It is first worth considering why these proposals for a massive increase in housing targets for our county have come about. The Westminster parties have effectively come to a consensus that mass housebuilding is necessary to expand the taxbase to help pay for ever expanding public spending. There appears no will to fundamentally reform that sector to put it in a financially sustainable position, not reliant on ever more vulnerable economic growth, increasing the population and stealthy tax rises.

Given the need to build, the question is how can this be done sustainably and deliver taxbase growth most effectively. The government’s proposals, to both the current and overall planning system, with respect to building targets, affordable housing and infrastructure provision, will not achieve those aims.

The proposed changes to the standard methodology represent a strategic missed opportunity to direct the economic activity related to housebuilding to those areas that most need it, i.e. those currently heavily dependent on public sector support which therefore have the greatest latent capacity for growth.

By targetting those areas with the greatest affordability ratios, e.g. Sussex, the government is attempting to force more development into areas that already face severe infrastructure challenges. The physical constraints of the SE region’s rail network limit its ability to expand capacity. The A27 in West Sussex is proving an intractable problem, with only very high environmental and financial cost solutions available to support existing targets, let alone those proposed.

A major infrastructure challenge, for the already water stressed SE region, is its water supply and sewage network. This will require a massive investment by the water companies, all in the face of lower abstraction capacity, climate change, social tariffs, Ofwat imposed price controls and perverse efficiency targets. Leakage reduction will only go so far. Sewage infrastructure is already proving to be inadequate. The cost of new capacity is not being covered by developer contributions and sewer surcharging is exacerbated by deteriorating road and land drainage infrastructure.

It does not appear that government has assessed either:

* The water companies financial capacity to meet existing challenges and higher development targets;
* The cost of transport infrastructure requirements, which will be far more expensive to provide in the se than elsewhere in the UK; nor
* The cumulative loss of high quality agricultural land or the coastal horticultural industry’s viability.

The government is relying on a new infrastructure levy to address infrastructure concerns, however it is proposing rates which appear not take into account local variations in requirements, costs or viability.

The proposed inclusion of affordable housing provision will force choices between that and infrastructure. This will be exacerbated by the loss of s106 agreements and hence the ability to compel developers to provide on site affordable housing and potentially add land costs. The proposal to raise site size thresholds poses a further challenge, which also incentivises developers to break up sites into smaller parcels.

I doubt the development industry has the capacity or the will to meet these higher targets. It will therefore be impossible to maintain extant local plans as local authorities cannot force delivery on the scale required. That leads to incremental and fragmentary development leading to infrastructure shortfalls as land is not made available to provide for cumulative impacts (e.g. primary school capacity where needed). Coherent transport and utility planning is also compromised. This will be exacerbated by the extension to permission in principle.

Given the demographic of those who buy dwellings in Sussex, and the challenges to affordable housing provision, there is no evidence that these higher targets will make any significant difference to affordability in our county.

These numbers will result in a continuous belt of uncoordinated development linking the Brighton and Solent City conurbations, destroying the individual identity of settlements and isolating the harbours from the National Park. This, along with Neighbourhood Plans being reduced to design guidance, will further demoralise residents and councillors and accelerate the undermining of local government.

No individual or cumulative impact assessments accompany these proposals - is this an area of legal challenge?

I hope that Government will think again on its proposals and pay more heed to elected local councillors than the unelected Development industry which appears to have more access to, and influence on, Westminster politicians.