



## HOUSE OF COMMONS

LONDON SW1A 0AA

The Rt Hon Angela Rayner  
Secretary of State for Levelling Up, Housing and Communities  
Ministry of Housing, Communities and Local Government  
Fry Building  
2 Marsham Street  
London  
SW1P 4DF

23 September 2024

### **NPPF consultation response**

Dear Angela,

I am writing to you in response to the consultation on proposed changes to the planning system and the National Planning Policy Framework as the Member of Parliament for Bromsgrove, reflecting the views of my constituents.

Worcestershire is defined by its greenspace and rurality, providing a sharp contrast to the West Midlands County next door. Bromsgrove District is predominantly rural district, with 89% of the land covering 20,000 hectares is designated as Green Belt<sup>[1]</sup> and it is this rurality that creates a separate local identity from Birmingham and the Black Country.

I am deeply concerned that some key proposals in this consultation will provide serious harm to constituencies such as mine, while failing to provide the reform necessary to solve affordability challenges within the housing market.

### **National Housing Targets and protection of green spaces**

While I agree with national aspirations to deliver more housing, house building must be with the consent of local people and be approved by democratically elected local councillors, who provided they follow national guidelines, are free to take development decisions for their local area in the interest of their residents.

These changes create aggressive mandatory housing targets. This is wholly incompatible with the principles of allowing local decision makers to make the best decisions for their area, and instead they will be forced to answer to Whitehall.

The proposed change to the New Standard Method increases the housing allocation for Bromsgrove District's requirement to 704 dwellings per annum from 386 per annum. As Bromsgrove constituency is 89% Greenbelt, this development will come almost exclusively at the expense of our Green Belt, something valued by residents across the district.

## **The New Standard Method**

An increase to our mandatory housing allocation would be understandable if the formula reflected the local housing market in Bromsgrove, however it is completely flawed.

My constituents want affordable homes, especially for first time buyers and those looking to downsize to bungalows, however the New Standard Methods affordability fails to accurately measure local housing demand, creating an incorrect housing need figure.

The Affordability ratio shows the relationship between local house prices and jobs available in that locality. However, this does not accurately reflect the reality of districts such as Bromsgrove, where many people commute into major cities where there are higher paying jobs, which puts upward pressure on Bromsgrove house prices and makes the local income figure artificially low, both of which incorrectly drive up our housing allocation.

Bromsgrove District Council and I are completely opposed to increasing the flawed affordability multiplier from 0.25% to 0.6%. Our assessment shows that this will directly result in thousands more homes being built in high quality green belt in our District, when there is not a sufficient local need for this to happen. The effect of this change will in fact be to accelerate development in the very places that the Green Belt was established to protect.

There should be a way for local authorities to demonstrate that the affordability criteria do not adequately indicate housing demand within the local authority and thus be able to produce an alternative figure for which their housing numbers are based. Especially as these targets are mandatory.

## **The Greenbelt and Grey Belt**

The proposals regarding the 'grey' belt will incentivise the downgrading of Greenbelt sites, while creating sporadic and unplanned development. This is a huge concern for areas such as Bromsgrove that are defined by their rurality, when contrasted against neighbouring urban areas. My constituents consider all our Greenbelt to be high performing and fundamental to the rural character of Bromsgrove district and wider Worcestershire, regardless of its technical classification.

My first concern is that the policy creates perverse incentives. The policy will create an incentive for landowners and site promoters from purposefully allowing high performing Green Belt land to degrade, for instance via a lack of maintenance or investment on the quality of the land. Similarly, this policy would create an incentive for unauthorised development, where the landowners' intention was to create previously developed land to thus enable development at a future time.

I also share Bromsgrove District Council's concern that a new focus from the development sector on acquiring planning consent for residential development on 'grey belt' land could lead to a more piecemeal distribution and scale of development across a local authority area, which would hinder the ability to deliver comprehensive, larger scale infrastructure provision to support new development, while degrading the whole of the Green Belt area, instead of allowing planned development on the edges if the land supply is required.

Current policy already allows for low performing greenbelt to be released in exceptional circumstances meeting the aims of this policy. If Green Belt land is deemed to be suitable for development after consideration of a wide range of potential constraints to development, including by virtue of it making a limited contribution to the five Green Belt purposes, then current policy allows for the demonstration of exceptional circumstances in order to alter Green Belt boundaries and release the land from the Green Belt. The new policy instead seems designed to permanently weaken all of the Green Belt.

The Council's submission also correctly notes that the policy is also unclear. When the definition says 'make a limited contribution to the five Green Belt purposes' is this a test against all five, or the majority, or is one purpose more important and thus carries more weight?

### **Cross Authority Cooperation**

Strategic Planning must not simply move housing allocations from cities such as Birmingham and the Black Country into surrounding counties such as Worcestershire.

Bromsgrove District Council and I are also concerned the governance of the local housing area is dominated by large urban authorities, with a combined authority and an elected Mayor. As it stands BDC and its residents have no say in the decisions taken by the WMCA and the Mayor.

Infrastructure

In Bromsgrove we have significant pressure on our all our public infrastructure, with heavily congested roads, pressure on GPs and other medical services. We also have issues with a lack of water and sewage capacity and enhanced flood risk due to poor drainage.

Enhanced infrastructure must come before new development; not afterwards and therefore I am broadly supportive of the changes that introduces significant weight for "new, expanded or upgraded public service infrastructure" in principle.

### **Small developers and Land banking**

Many constituents have expressed concerns about the activities of larger house builders, particularly their failure to provide adequate site drainage, suitable connecting roads and pavements, and other infrastructure commitments. In my experience, smaller developers build better, more sympathetic homes which are more in tune with the wishes of the community.

Largescale housing developers are buying land without the intention of building it out quickly. Analysis by The Big Issue shows the eight leading housebuilders has found that the land they hold has soared to 918,823 plots, an increase of 49% on 2018.[2] On average, the eight largest have enough land to last for more than 11 years, based on the rate they built homes in their last full trading year.[3] By failing to quickly build out these plots, developers are artificially constraining housing delivery. These plots should be built out before any further Green Belt development is approved.

## **Villages**

Rural villages, both large and small comprise a key part of the identity of Bromsgrove district. The NPPF must allow these villages to thrive. This must include, encouraging sustainable development and the 'in-filling of the villages,' design codes that maintain the villages' identity and local input into planning decisions. Protecting villages from being absorbed into larger settlements must remain a key greenbelt priority.

## **Design**

I do not agree with the proposals to retain references to well-designed buildings and places but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework. Removing the specific references to beauty, it will deprioritise this aim and consequently lead to worse development.

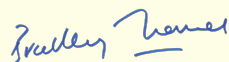
When I was leader of Wychavon council, we worked with Create Streets to produce our local design code. This created four different versions to reflect different characters of areas of Wychavon. This code supported the "the creation of high quality, beautiful and sustainable buildings and places" requirement of the previous NPPF.[4]

By creating a detailed and area specific local design code this encouraged led to better development that was supported by a wider proportion of the public. By ensuring that beauty is at the forefront of any future Framework, we can not only deliver housing, which is aesthetically pleasing, but which will be more welcome in communities which for too long have felt that the planning system bulldozes over local distinctiveness with little regard for local character or heritage.

Nationally we must shift our mindset away from one where beautiful design is seen as a cost, and instead to one where beautiful design is an investment which delivers tangible and intangible returns in the form of happier communities, with better health and wellbeing outcomes, and places which are ultimately fertile destinations for private sector investment because of the vitality of the thriving community within.

Planning policy and protections for our Green Belt is one of the largest issues for my constituents in Bromsgrove, especially with our natural environment being under such development pressure. I strongly oppose these changes, especially the imposition and doubling of mandatory top-down housing targets and the weakening of Green Belt protections. I would be keen to meet with you to discuss these changes and the effect they will have on my constituents.

Yours sincerely,



**Bradley Thomas**

*Member of Parliament for Bromsgrove*

House of Commons, London, SW1A 0AA

[1] Bromsgrove.Gov.UK (2024). Bromsgrove District Council Plan 2024 - 2027. [Online]. Bromsgrove District Council. Available at [https://modern.gov/web/public.bromsgrove.gov.uk/documents/s59391/BDC\\_CouncilPlanJune24\\_WEB%20Final.pdf](https://modern.gov/web/public.bromsgrove.gov.uk/documents/s59391/BDC_CouncilPlanJune24_WEB%20Final.pdf). [Accessed 23 September 2024].

[2] Howell, S. (2023). Labour must urgently tackle land banking to have any hope of solving UK's housing. The Big Issue. [Online]. 18 December 2023. Available at <https://www.bigissue.com/news/housing/land-banking-uk-housing-crisis-labour/> [Accessed 23 September 2024].

[3] Ibid

[4] Wychavon District Council and Create Streets. (November 2022). Wychavon Design Code. Wychavon.Gov.UK. [Online]. Available at <https://web.archive.org/web/20240415124727/https://wychavon.gov.uk/about-wychavon-district-council/consultations/design-> [Accessed 23rd September 2024].