

HARRIETT BALDWIN MP



HOUSE OF COMMONS  
LONDON SW1A 0AA

The Rt Hon Robert Jenrick MP  
Secretary of State  
Ministry for Communities, Housing and Local Government  
Fry Building  
2 Marsham Street  
London SW1P 4DF

September 15, 2020

Dear Robert

I am writing to you in response to your consultation on the Planning for the Future white paper in my capacity as Member of Parliament for West Worcestershire, reflecting the views of my constituents, local stakeholders and the business community. I have also discussed this matter with the leaders of Malvern Hills and Wychavon District Councils, and also the director of planning for these two councils.

I have studied the white paper in detail and make the formal responses to your questions attached. In addition, I would like to re-iterate the following points:

### **National Housing Targets**

While I agree with national aspirations to deliver more housing, there has been significant local concern about the number of houses which are being required in rural West Worcestershire as part of this strategy. I am briefed that south Worcestershire has delivered an average of 1,923 new homes each year over the last four years. This is impressive progress but both Malvern Hills District and Wychavon Councils have suggested to me that proposed future targets are undeliverable. As someone who campaigned strongly against the imposition of 'top-down' housing numbers and the Regional Spatial Strategy, I cannot support any policy change which re-adopts this approach and such an approach is widely rejected across my constituency.

## **Flood plain developments**

My rural constituency has three major rivers – the Avon, Severn and Teme – and from time to time suffers significant flooding – to the extent that six major flood defence schemes have been constructed to protect homes and businesses and two more are being progressed by the Environment Agency. I am eager to make sure that any future planning policy continues to prevent the construction of homes in flood plains and new development is sensitive to its impact on drainage.

## **Neighbourhood Plans**

As a matter of policy, I have always taken the view that planning decisions need to be taken at a local level and I never comment on individual planning matters – that's the role of local councillors who are closer to their communities and are best placed to lead that decision-making process. I have also been a strong champion of the Neighbourhood Plan and have held workshops for parish councils in my community to help them understand the importance of delivering their own blueprint for future growth. I therefore warmly welcome the fact that you plan to maintain the importance of ultra-local plans – I believe local people and local communities know best where allowable development should take place. I would be keen to ensure that this commitment is clarified and communicated to those communities who have a current plan, or who are in the process of developing one. I also suggest that better use could be made of technology to make this process simpler and more dynamic – ensuring such plans can become living documents.

## **Village Categorisations**

I have consistently held the view of the last over the last ten years as Member of Parliament for West Worcestershire that small-scale, locally approved developments are key to delivering organic growth and allowing our rural villages to thrive. With this in mind, I have criticised the principal of village categorisation, which prevents many smaller villages from expanding and forces major housing developments into the larger villages. I welcome any change which will help our smaller villages to grow organically – as they have for generations – and planning changes should focus on sympathetic, locally supported development. If each village were allowed to build five or ten houses each year, on sites agreed by the community, our local housing supply would be more than adequate. In parallel, we must have a policy which protects our green spaces, prevents urban sprawl. Similarly, I am keen to see a relaxation of the categorisation for commercial use to help our communities to adapt to changing needs.

## **Smaller housing developers**

I have had a significant number of constituents raise their concerns about the activities of the larger house builders and in particular their lack of delivery for appropriate drainage of sites, fit-for-purpose connecting roads and pavements and other infrastructure commitments. In my experience smaller developers build better, more sympathetic homes which are more in tune with this white paper and I would be keen to see policy reflect a higher level of support for smaller companies delivering in both small and large-scale developments.

## **Green spaces**

Although it is not my policy to comment on individual planning applications, many of the representations made to me have involved concerns about development which impinges on our green spaces and urban sprawl, particularly the growth to the west of Worcester. I have also been concerned at the increase in applications to build on our prime agricultural land and would be keen to see measures confirmed in the new policy which clearly underwrite these protections. I have also supported the work of the Malvern Hills Trust and the Cotswold AONB, which work to protect our important green spaces.

## **Green agenda**

I have welcomed the Government's 25 year plan for the Environment and the net zero carbon emissions commitment and have championed local efforts to build more energy efficient houses and support initiatives that improve the energy efficiency of the current housing stock. The rural nature of West Worcestershire means that cycling is an attractive alternative to private car use or public transport and I have urged the local planning authorities to develop longer term strategies to support cycling and walking. I am keen to see this planning process review take full cognisance of the importance of the green agenda as well as ensuring that we make the best use of our green spaces for our and future generations.

Although I welcome the direction of travel set out in your white paper and welcome the principal of liberalising the planning process. I also welcome the principal of aspiring for better design, but I would be keen to make the point that beauty is in the eye of the beholder and I would be unwilling to support centrally-imposed design or style constrictions. Finally, I am keen to underline that I have, and always will be, opposed to 'Stalinist' top-down housing targets and by following this approach, I would not be able to support your proposals.

Yours sincerely

**Harriett Baldwin MP**

Member of Parliament for West Worcestershire

## Question Responses

1. Strict
2. Yes, if near my own home.
3. By post
4. Building extra care housing for older people, freeing up family homes.  
Protection of green spaces and prime agricultural land.  
Ensuring climate and flood resilience for the whole area.
5. No. Not 100% although I do support a liberalising reform. I agree that the 1947 Town and Country planning act is too statist and blocks housing delivery. I also think it is very rigid and is then made even more rigid as it reaches local levels. I support a presumption in favour of development by a landowner, provided it does not create harm for others or the environment. I support the principles outlined in the National Planning Policy Framework and the Neighbourhood Planning Process. I also support designating brownfield sites for Growth. In addition, I am not clear about whether this is just a change to housing planning. What will happen to things like new abattoirs, chicken farms, pig farms, incinerators etc.? I do not think these should just be waived through in growth or renewal areas.
6. Probably.
7. (a) The problem with this is that it ignores local flood risk evaluation, so I would need to know how that would be controlled. I have also experienced “sustainable development” as a reason for planning authorities turning down eco-homes in smaller villages they have chosen to designate as not sustainable. So it’s too vague a test. (b) I don’t have an answer.
8. (a) No. I disagree with top down Stalinist housing allocations and prefer an ad hoc approach based on market forces. After all, this was the way that all the beautiful settlements we love today arose before the 1947 Town and Country Planning Act was introduced. (b) I agree that areas around existing settlements should be the preferred locations for new development. I support this being applied proportionately to even small settlements, so that even a small settlement of 100 homes can expand by, say, 1% a year.
9. (a) For brownfield sites, yes. Good to try to speed up the process. I’d like to see a relaxation of the categorisation of commercial use and housing use, as the shift to online shopping will mean that more town centres need to shift to housing. I’d also like to see a relaxation of the rules in conservation areas to allow retrofitting of energy efficiency and green home adaptations like double glazing and solar panels. (b) If Renewal is tightly drawn to include areas that are already built up, then yes. I’d like to avoid a lot of “garden-grabbing” though. I think we should also accept more, slightly higher buildings – the permitted development right of an extra two stories, provided it does not affect neighbour’s light, is sensible. (c). Yes, with the appropriate infrastructure.
10. Yes.

11. Yes.
12. I would prefer to see Local Plans as living documents so that it is less bureaucratic and onerous for new sites to be added as they emerge. I support the Neighbourhood Planning approach where the plan goes to a local referendum and then has statutory force. So I do welcome the proposals to make the process less rigid and time-bound.
13. (a and b). Yes. Very much so. Perhaps the department could develop an App?
14. There have been some very serious problems with the quality of build by major housebuilders. So I support measures which allow large developments to be built in smaller sections by smaller builders, provided basic quality can be enforced.
15. We've had really bad examples and really good examples. Smaller infill sites and conversions have tended to be better designed than the large, cookie-cutter site developments.
16. Ensuring that there is no development on flood plains and new development is sensitive to its impact on drainage.
17. I always appreciate development that is in tune with the vernacular architecture of the area but I would hate to see good examples of daring, modern, new architecture being prevented by a design guide.
18. Sounds a bit bureaucratic. Beauty is in the eye of the beholder, not a chief officer for design who may well have prejudices of their own.
19. Should be easy to do.
20. No. Beauty is in the eye of the beholder. One person's pastiche is another person's ugly modern replica. Let's leave the state out of deciding what is beautiful.
21. Transport. Active travel. Green space and trees. Drainage.
22. (a) It depends where the threshold is set. I am concerned that a threshold will mean that lots of smaller developments will be built without adequate drainage or transport investment. (b). It should be linked to the value of the development and the money should flow to the local area. But it could be a nationally agreed percentage to avoid protracted arguments about payment. (c) I am in favour of lower taxes on housing development to keep homes affordable. (d). Yes.
23. Yes, if not already captured by capital gains tax.
24. (a). I fear high affordable housing allocations just lead to less affordable housing for everyone else. A simple, non-negotiable way of ensuring money reaches the public purse to be invested in state-subsidised housing would be an improvement. (b) Either. (c) Yes. (d) Yes, planning permission.
25. Not sure. (a) N/A
26. It's important that there is more adapted housing, that it is easier to make adaptations and that extra care housing and more bungalows and flats be available for older people to purchase.