HARRIETT BALDWIN MP



The Rt Hon Michael Gove MP
Secretary of State
Department for Levelling Up, Housing and Communities
2 Marsham Street
London
SW1P 4DF

February 28, 2023

Dear Michael

I am writing this in response to your call for views on the new National Planning Policy Framework and submit these views on behalf of the people and businesses of West Worcestershire, with whom I have consulted on this matter, and following conversations with a number of district council officers and councillors. As you will know, I supported amendments to the Levelling Up and Regeneration Bill submitted by my colleagues Theresa Villiers MP and Bob Seeley MP and have seen their further proposed correspondence with you on this matter, which I endorse.

I would like to set out my own principal concerns for your consideration – planning policy is one of the most common issues in my postbag and although I do not make comment on individual planning applications, I do pass comment on, and closely follow, local planning strategy.

Five Year Land Supply

Malvern Hills District Council, Wychavon District Council and Worcester City Council have, over the last ten years, collaborated on a South Worcestershire Development Plan which was first adopted in 2016 and is currently undergoing a planned refresh. I have written to your Department previously on the challenges Malvern has faced maintaining a five-year land supply and the anomalies caused by Planning Inspectors who refused to look at the South Worcestershire five year land supply and instead chose to enforce a smaller geographical area for its calculation. This has led to a number of large-scale, unwanted planning developments being passed under the 'presumption of sustainable development'. All three councils have worked hard to maintain a five-year supply and Wychavon has delivered many new homes over the last eight years, but this policy has led to significant problems locally.

I therefore fully support the abolition of the five-year land supply requirement.

Housing Targets

Prior to my first election in 2010 and subsequently, I have strongly opposed the imposition of top-down housing targets. In Malvern Hills, in particular, we face the challenges of a large

Area of Outstanding Natural Beauty – precluding housing development, and large areas of flood plain where new housing is impractical and ill-advised. Therefore, there is only a finite area available for housing development and this has already borne the brunt of significant new homes over the last decade. I would also point out that Wychavon District Council, which led a significant new house building programme and benefited from the successful New Homes Bonus scheme, now faces significant challenges to find more sites for development as a direct result of its historical success in delivering more homes. I urge the new policy to give appropriate credit for a council's recent house-building and to take into account historical delivery when planning future housing numbers.

I also have supported my colleagues' endeavours to express support for the Green Belt and the protection of green spaces as buffers between villages, towns and cities.

While I recognise the need for new homes and to deliver on our national targets, I feel that south Worcestershire has already been asked to enable significant new housing. I recognise that under the latest proposals, top-down targets are advisory, but any future development, and the size of that development, should be with the explicit consent of local people and their elected representatives.

I have fully supported the South Worcestershire Development Plan, despite its lengthy gestation, and I support those communities who have democratically approved their own Neighbourhood Plan to indicate a clear view on acceptable housing growth in their area. I therefore resist top-down imposed targets and encourage locally-informed growth which has the consent of local people.

In addition to the above comments, I have specific responses to some of the questions raised in your consultation document. I am on record supporting the additional building of extra care housing (question 23) and West Worcestershire's growing elderly population needs homes to move into that allow their independence whilst freeing up family home stock.

I have also supported initiatives which encourage small sites (question 24) and the need to encourage small-scale housing developers. I have encouraged Malvern Hills District Council to review their village categorisation to allow for single dwelling and small site development to enrich smaller villages and allow them to grow organically.

Along with many colleagues, I have expressed concern about the very large development companies and their unwillingness to adhere to their commitments to their customers and the community. I welcome the principle of taking an applicant's past behaviour into consideration when deciding on specific applications (question 30).

As an MP with an extensive rural economy and many diverse food producers, I support the protection of agricultural land to ensure food security and to protect a valuable economic asset (question 38). I have also made the suggestion that farmers should be allowed to build a single new home on their land – which according to 2021 statistics, would create 216,000 new homes as well as creating wealth and new jobs.

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Many communities in West Worcestershire have produced their own Neighbourhood Plan and I have supported efforts where they have achieved a clear and unambiguous view of what development they support. This work has been time-consuming and expensive and I would resist any efforts to undermine this work and to require them to update their plans (question 47). I am also eager for future policy to ensure that Neighbourhood Plans have appropriate weight when applications are considered by a Planning Inspector.

Finally, I have supported efforts to use brownfield sites (question 55) as a priority to support sustainable development across urban and rural communities. This has been particularly successful in the delivery of social housing in my constituency, and I welcome the re-use of already developed sites.

Yours ever

Harriett Baldwin MP

Member of Parliament for West Worcestershire