



HOUSE OF COMMONS

LONDON SW1A 0AA

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Rt Hon Angela Rayner MP
Secretary of State for Housing, Communities and Local Government
MHCLG
2 Marsham Street
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23 September 2024

Dear Angela

I am writing to you regarding the proposed reforms to the National Planning Policy Framework (NPPF) and I will also be formally submitting this as a response to the government's consultation.

Before turning to my substantive critique of the changes proposed, I will begin by stating firmly on the record that I support the government's recognition that as a country we need to build more houses. Governments of all stripes over the past 25 years have failed to grasp the nettle in this regard. A combination of NIMBYism and a planning framework heavily privileging developers over the aspirations of new homeowners has consistently stymied progress. The result of this is that we have not built enough homes, demand has outstripped supply, and house prices have skyrocketed relative to household income. This is not sustainable.

However, successful identification of the problem, does not lead automatically to an appropriate solution. Unfortunately, I fear the reforms to the NPPF proposed by the government leave many of the underlying issues unresolved; the upshot being that the government's aspirations – sincerely held as they may be – will likely remain unfulfilled. I will now turn to some specific points regarding the flaws in the NPPF reform.

My overriding concern is that local communities retain control of the process and that development which takes place is always plan-led. Regardless of the appropriateness or otherwise of nationally mandated housebuilding targets, it should be the responsibility of local communities and their elected representatives to deliver housebuilding according to the local plan. For example, regarding questions 6 and 7 of the consultation, I fear that amending the presumption in favour of sustainable development and reinstating the 5-year land supply – reversing the changes made by the previous government – will undermine the ability of local authorities to pursue plan-led development. Instead, the proposed reforms will leave developers in the box seat.



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The reforms proposed will result in a planning framework that remains vulnerable to developers effectively 'gaming' the system. Sites acquired and offered for the local plan can be held back from housebuilding if developers deem the proposed locations to have 'complications' or not being able to bring forward housing to originally envisaged timescales. This leaves local authorities susceptible to falling behind on their five-year land supply calculation, which in turn will open the door to developers building houses according to their own best interests at a time, pace, and location of their choosing, rather than the local plan, which places democratically elected local representatives at the centre of decision making. Paradoxically, a reform to boost housebuilding will empower developers to do the exact opposite.

Turning now to the specific issue of numerical housebuilding targets, I have grave concerns in response to question 3 of the consultation. The reforms seek to reverse the urban uplift which was introduced by the previous government in December 2023. As a result of the fact that many of our major urban centres were not building enough new homes, the previous government increased the housebuilding requirement for the top 20 largest urban areas by 35%. Reversing this policy will mean that many areas of the country where housing demand is highest will see a reduction in the calculation of new houses required. Perversely, this will occur in locations where critical infrastructure such as the transport network, retail facilities, education and healthcare providers are well established, and where density of new homes on brownfield sites can be achieved more straightforwardly compared to building on greenfield sites where infrastructure across the board will need to be built from scratch to accommodate a larger local population.

Removing the urban uplift will mean that some parts of the country see a huge reduction in the number of new homes required. For example, 24 of London's 33 boroughs will be set a lower housing target than under the current method. The target in Tower Hamlets will be 58% lower than it is under the current method. Other urban areas of the country where we should be particularly focussed on building new homes will see a reduction in their target. Coventry's target drops by 50% while Birmingham City Council also sees a 31% reduction in its target. Meanwhile, rural counties such as Wiltshire are being set a huge increase. The current method requires 1,917 new homes to be built per annum across the county, but the NPPF reforms will increase that to 3,476 – an enormous increase of 81%.

My constituents are not NIMBYs. I am contacted regularly by Salisbury residents who are struggling to get onto the housing ladder and there is widespread recognition that we need to build more homes. However, in doing so, we must be cognisant of the need to protect our countryside and accept that housing targets must be more heavily concentrated in areas of the country where demand is highest and infrastructure is already partially in place to cope with higher population numbers.

RT HON JOHN GLEN MP



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My final significant concern with the proposed NPPF reforms concerns Question 59 and the proposal to remove references to 'beauty' and 'beautiful' in relation to well-designed development in paragraph 138 of the NPPF. Over the past few decades, new housing development has invariably meant bland, 'cookie-cutter' housing estates of relatively limited aesthetic quality, which have been added to green fields on the edge of existing settlements. In addition to the lack of attention to architectural appeal, new homes have too often been blighted by poor build quality, with homes constructed quickly to maximise profit for housebuilders, and often been accompanied by insufficient supporting public infrastructure which has blighted the lives of new inhabitants. The push to remove references to 'beauty' from the NPPF should therefore be resisted.

In conclusion, we all recognise that we need to increase the housing supply in the United Kingdom. However, this needs to be plan-led development, under the control of local authorities not developers, and with an ambition to build new housing and communities with strong aesthetic appeal which will stand the test of time and we can all be proud of. I fear that the reform proposals to the NPPF offered by the government will not achieve any of these goals.

Yours sincerely

A handwritten signature in black ink that reads "John Glen".

Rt Hon John Glen MP
Member of Parliament for Salisbury
Shadow Paymaster General