

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

October 13th 2020

Dear Mr Jenrick,

I am writing to you on behalf of Hallow Parish Council, Worcestershire to convey the concerns of the Parish Council about the Changes to the Current Planning System; and the Housing White Paper.

1. National Housing Targets and the proposed Housing Algorithm

The methodology for calculating housing requirement will disadvantage those rural parishes that have already taken considerable housing, and result in the over-build of category 1 villages beyond what is sustainable. Hallow Parish has already seen 131 houses built with more assigned, from a starting position of 532 households based on the 2011 census. The projected uplift up to 2041 under the revised South Worcestershire Development Plan will be difficult to absorb, with consequent pressures on local infrastructure. The proposed methodology will have considerable negative impact here and on many rural parishes in other parts of England. Using growth rather than need creates a bias in the housing system, and in effect punishes those villages who have met recent need (and in some cases like Hallow, have gone beyond local need). This, combined with high average house prices, a bias towards large executive homes and lack of genuinely affordable homes locally distorts provision away from parish-based need. Much local development has been commuter and car-travel inducing, with some journeys to work over 40 miles round trip (based on parish survey, 2018).

2. Market failure to meet local need

Neither the White Paper or the change in methodology will deliver what is required at truly local level. Difficulties will remain where large national developers “land bank” against future house pricing uplift, and where the gap between local earnings, particularly in the public sector, and local house prices remains overly large. We have young adults working in Hallow who cannot afford to live here, or those born and raised here have to move out. Growing families do not find “affordable housing” affordable. The specific issues of rural parishes are not addressed in either government document.

3. Permission in principle

We think it is imperative for local democracy that local people are engaged and involved, usually via Parish and District Councils. Whilst we would welcome speeding up the planning process, there is a role for community

consultation and engagement. In our parish experience this can result in better design, and a slightly more responsive approach by developers to reasonable community concerns. It is often larger, major developments that raise the most legitimate concerns. Preventing community engagement and consultation runs the risk of higher levels of 'Nimbyism', and runs the risk of undermining the credibility of the planning system and eroding public confidence in it. As a Parish Council we are front and centre in hearing community views and we already know that public confidence in the planning system locally is low, with a common perception that their views and concerns are ignored, and that 'the system' is loaded towards the developer. When this is coupled with housing provision that is perceived by local people as 'out of kilter' with local need then very negative perceptions of planning ensue.

In addition, the White Paper emphasises a plan-led approach, but still allows for speculative applications. We are aware that residents resent this, and that this erodes trust and confidence in the plan-led approach. If LPAs pursue local plans at some time and cost, and consult robustly, then allocated sites and targets should be adhered to, and applications outwith the local plan should be disallowed. There is nothing worse than contributing to consultations and to a local plan than to have this discounted via speculative applications. These fuel anxiety, erode certainty, and distance communities from planners.

4. Neighbourhood Development Plans and Neighbourhood Development Orders

We think these should be strengthened not weakened. Generally, NDPs and NDOs have a good track record in addressing parish level need, in supplying sites, tenure and size mix to meet their parish need. They also have an increasingly good track record in the production of genuinely village level design codes that can ensure better fit of new development to existing character of the locale. If anything, more resources and support should be provided at parish level to complete NDPs.

5. Green infrastructure, green spaces and carbon zero

We think the proposals should go further in promoting and protecting green infrastructure and green spaces. Again, we think these are best identified at local and parish level working together. The proposals lack clarity in terms of defining and characterizing sustainable development, and a strong commitment to zero carbon going forward.

Yours sincerely,

Clerk Hallow Parish Council
Copy Harriet Baldwin, MP, Worcester West Constituency
Copy Christopher Pincher, MP, Housing Minister

