MIMS DAVIES MP



HOUSE OF COMMONS LONDON SW1A 0AA

The Rt Hon Angela Raynor MP Secretary of State Ministry of Housing, Communities & Local Government 2 Marsham Street London, SW1P 4DF

By email

26th September 2024 Our ref: MD38043

Dear Secretary of State

I am writing as the concerned constituency MP on behalf of the communities in East Grinstead, Uckfield, and the villages about this Government's approach to housebuilding and to share my response for your consideration to the recent proposed reforms to the NPPF and other changes to the planning system Consultation.

People in my area are essentially positively pre-disposed to the opportunity to see their communities continue to grow and want and need the infrastructure to match this, as we are a predominantly rural constituency. This is matched with a thriving farming economy, numerous small villages and hamlets, along with two medium sized towns. We are fortunate that a majority of our land consists of Areas of Outstanding Natural Beauty, forests and the South Downs National Park. While we are blessed with some of the most quintessentially British landscapes, this also means we have been given the added responsibility of conserving and protecting this irreplaceable environment with its extensive biodiversity.

Numerous concerned constituents, pressure groups and local parishes have already been in touch; they are aghast at where we are at in terms of the Government's proposal. They are determined to share their resounding fears of the impact of these potential reforms. Alongside this Councillors have also been highlighting their own deep concerns about the pressure on our stretched infrastructure, whether it be our services, road networks, water supplies, NHS, dental and GP services, or on our local schools.

For context much of the area is truly constrained in terms of planning. We have the South Downs National Park to the south, and the impacts of constrained coastal communities and its overspill, with the High Weald AONB to the north, and Ashdown Forest to the east. Yet Conservative led councils in Sussex, particularly in Mid Sussex, have stepped up to the plate providing an up-to-date workable District plan, this has not been matched in Lewes and Wealden Districts under other leadership and there is real worry this lack of leadership by others will impact the whole.

As you will be aware, Sussex is in a 'Serious Stress Water Area' and in fact, we have had major outages on numerous occasions in recent years across the whole region which makes up a large proportion of this constituency. This was critically due to the availability and design of the water system in our area, which was not fit for purpose for these growing property numbers. It is further intensified by the heavy demand from homes plus urban and rural businesses, especially during the height of summer. I fear we will see more regular mass outages if the proposed developments and housing numbers are imposed on the area. We urgently need at least one additional reservoir. How is this to be achieved?

No-one is against more housing where it is suitably built, accessible and needed, as long as it is in the right place with the right associated roads and wider infrastructure. However, the addition of thousands of new houses in large, unsustainable rural locations would deliver drastic and irreversible changes to our special rural areas. It would dramatically change numerous landscapes and communities in our constituency both reducing green spaces and green gaps we have sought consistently to protect, as well as increasing pollution and traffic congestion on many small roads and lanes.

It is generally felt development should be more modest in size with a move away from the large executive style buildings that developers seem to favour. Building more houses that sell for a minimum price of £700,000 only increases further upward pressure on house prices and would do nothing to deliver the houses our local communities actually need and are far outside of the reach of the majority of those who live locally. The type of housing that our parishes and councils would encourage is social/council housing, bungalows/apartments, and small 1/2/3-bedroom houses that are genuinely affordable. Suitable rural exception sites and self-build sites should be much easier for parishes to deliver.

However, it is vital we hold social housing providers to account along with other housing developers in meeting the highest standards of environmental regulations and not allowing retrofitting after the fact. We insist on this with the car industry for example and the housing industry must absolutely play its part in working towards our Net Zero ambitions. However, solar farms, pylons and battery storage sites need better regulation, safety audits and mapping as critical infrastructure linked in with the HSE so that small rural communities blighted by this imposition feel supported by Government, the planning system and that it will meet fire regulations. I urge your department to work across Government to listen to worries about loss of agricultural land coupled with significant safety concerns associated with this type of land use.

We must support local areas with their local plans, encouraging those parishes who are doing their bit without support from the district with a clear need to hold those councils who have not created housing plans to account. In addition, the duty to cooperate in this area is being unfairly used to penalise local areas by the need to accommodate overflows from Brighton. It is our urban hubs where properties are most urgently needed – where young people are desperate to live, where the jobs are, and the obvious places to boost economic growth. Too many brownfield sites, car parks or empty buildings are not utilised in urban spaces at the expense of our green fields and green belts. Rent to buy schemes such as 'Rent Plus' should be extended to help deliver affordable rent and open up additional routes to home ownership. We have one very successful site in Felbridge I would encourage Ministers and officials to see.

It is imperative that development should be permitted only if the developers undertake to enhance the existing infrastructure (roads, schools, sewage disposal, water supply, surgeries and so on). If it is unenhanced, then the existing infrastructure will struggle to cope with the expected increased demands. It is vital that this is taken on board by developers and planners.

Housing number targets need to be determined by objectively assessed estimates of likely future population growth, where there is employment or where there is likely to be future employment prospects, and not on the criterion the government is proposing. The gap between property prices and average incomes in the area disproportionately hits villages in Sussex and will not help the government boost growth which is a stated aim of these reforms. I sincerely believe as a former local Councillor, a centralised top-down approach is detrimental and won't deliver the numbers this Government is trying to say will be delivered. It makes planning more adversarial. This is unhelpful and delivers nothing positive.

Again, we do not oppose the building of beautiful, better quality and more homes, but they must be sincerely the right kind of dwellings in the right area with the appropriate infrastructure and crucially matched with employment prospects to ensure we are developing thriving and sustainable communities, rather than simply dropping dormitory towns into rural locations. The relentless focus on residential housing targets overshadows the pressing need for commercial and office space to support the creation and expansion of businesses and jobs in our towns and villages. We also need to encourage the diversification of businesses in the countryside to support our farming and food industry as well as plan for cattle markets, abattoirs, and butcheries to sustain our local produce and food security ambitions. In order to support local jobs, communities and economic growth, our local high streets need better and more thoughtful planning to stop shopfronts becoming easy residential conversions.

Social housing providers as charities should be compelled to act against ASB and stronger protections for un-neighbourly and criminal behaviour be delivered, as per the Conservative 2024 Party Manifesto. Social housing tenants should have suitable permitted development rights and a right to buy where multi-generation living is encouraged and is possible. Moving with the system should be easier and those who can afford to move to a mortgage and home ownership facilitated and encouraged away from this housing to help others get the stability and future opportunities they need too. Where you live and what type of housing should not preclude people from moving forward making space and opportunities for others.

Our national planning system should also protect important natural landscapes and heritage assets. Local planning authorities' planning policies should be allowed to conserve and enhance the natural, built, and historic environment, including landscapes. Planning policies must recognise the intrinsic character and beauty of the countryside, and foster better environmental outcomes, with a requirement to prepare Environmental Outcomes Reports to assess the potential environmental effects of relevant plans and major projects.

This will put protecting our environment and pursuing environmental improvements at the foreground of assessments. Greater weight should be given to local plans and national policy which will give more assurance that areas of environmental importance, including national parks and Areas of Outstanding Natural Beauty, will be respected in decisions on planning applications and appeals.

The UK's target of reaching net zero by 2050 recognises that wind and solar energy are key building blocks. However, there are genuine concerns about the impact some large-scale solar farms, in particular, can have on the rural environment. It is important that the best and most versatile agricultural land is protected. I believe local planning authorities should focus on using previously developed land and non-agricultural land for large-scale solar farm development, so long as the land is not of high environmental value.

Food security is an essential part of our national security. While solar and farming can be complementary, we must ensure the availability of land for food production is adequately weighted in the planning process. I will be carefully following the consultation outcome to see if the wording on food production is removed.

I urgently ask that you meet with Sussex MPs and Council Leaders to discuss this matter further and help us to find alternative solutions. This is in light of the constraints on our delivery of the proposed legislation and the widespread acknowledgement that we, as a country, need to protect our ecosystems and biodiversity, focusing on the regeneration of brownfield sites, boosting our rural economy and local towns, while protecting the precious landscapes and farming land within our rural communities. All of the above comments are also in the context of the live current Gatwick additional runway planning application. The opportunity to grow the airport is welcome by many constituents who work there and enjoy flying from this airport. However, the impact of noise, flight paths changing, loss of dark skies and road and rail impact as well as housing numbers is immeasurable. The vast impact will add to the pressure on housing, roads, and school places to name a few.

We can't keep seeing these matters in silos as that's now how constituents and communities feel. To have a fair NPPF that works, I urge the department to listen roundly to representations from MPs who are determined to see growth for this country but leaves us fit for the future while protecting our heritage, landscapes and unique community character alongside the future homes and workplaces we need.

Thank you for your consideration of this approach.

Mims Davies MP

Grateful Names