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19 August 2024

Rt Hon Angela Rayner MP
Deputy Prime Minister and
Secretary of State for Housing, Communities & Local Government
2 Marsham Street
London SW1P 4DF

Dear Angela Rayner MP By e-mail : angela.rayner.mp@parliament.uk

Re Playing your part in building the homes we need

As the Leader of the Conservative Group of Dudley Council, I write to you following your recent correspondence on 30 July to the Leaders of all local authorities which sets out the Government's proposals to deliver 370,000 new homes each year and the related reforms to the planning system.

Dudley Council will be responding to the consultation on the proposed changes to the National Planning Policy Framework (NPPF). However, having reviewed some of the proposed changes to the NPPF I have serious concerns which I feel compelled to flag up with you at this stage in advance of our formal consultation response.

At Dudley we have made significant headway in progressing our Local Plan towards the Regulation 19 stage and it is our intention to submit this Plan for examination in the new year. This Plan has been prepared following substantial engagement with our local communities and goes a significant way toward meeting our housing need, ensuring that we have a readily available 5-year housing supply, as well as utilising all of our brownfield land supply and delivering the wider regeneration aims of the borough.

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The proposals to change the Standard Method, as set out in the NPPF consultation document, will significantly increase the annual housing requirement for Dudley beyond a target that has ever been achieved in the borough. Even allowing for some of our highest net completion rates previously achieved (up to 760 dwellings) we feel that any annual housing target above our existing target, let alone the proposed annual housing figure of 1,594 homes, would be too ambitious, unachievable and to the serious detriment of the environmental quality of our borough. It is our view that even if we allocated all green belt land, greenfield and brownfield sites it would not be possible to deliver these proposed housing targets whilst also delivering the necessary infrastructure, supporting services for such a level of growth and ensuring that we protect the historical and natural environment of the borough which is valued by so many of its residents. There is simply not the land supply available to do this.

Alongside this, the transitionary arrangements which have been proposed will cause substantial delays to those plans, including the Dudley Local Plan, that have made significant progress in reaching the Regulation 19 stage, if there is a requirement for them to be reviewed again in light of the proposed changes. This will run the risk of long delays to many plans which are already at an advanced stage, and which include important policies on economic development, climate change, biodiversity, renewable energy and transport. On this basis, it is vital that we progress with the final stages of our current Regulation 19 Plan to ensure that we have an adopted Plan in place as soon as possible.

Whilst I understand and support the need to deliver more homes across the country, I ask that the Government fully consider the responses submitted to the NPPF consultation from local authorities, including Dudley's, who will be a key part in assisting with the Government's ambitions.

Yours sincerely

Cllr Patrick Harley
Leader of Dudley Council