



Ministry of Housing,  
Communities &  
Local Government

**Rt Hon Angela Rayner MP**  
*Deputy Prime Minister and Secretary  
of State for Housing, Communities &  
Local Government*

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London SW1P 4DF

Rt Hon Kemi Badenoch MP  
Shadow Secretary of State for Housing,  
Communities & Local Government  
House of Commons  
London  
SW1A 0AA

31 August 2024

Dear Kemi,

On Tuesday 30 July, I set out to the House of Commons the Government's plan to build the homes this country so desperately needs. As I said in my statement, our plan is ambitious, and this Labour Government is not afraid to take the tough choices needed to deliver for our country. It is imperative to get the houses people so desperately need built, after fourteen years of chaos and delay.

In your response to my statement – in which I noted you chose not to acknowledge the shameful inheritance left by the previous government, with housebuilding declining to such a level that we will see fewer than 200,000 homes built this year – you asked several occasionally contradictory questions, and requested that I provide you with a written response. I hope you will find the following answers helpful.

*Timeline for the consultation*

You queried whether the consultation was too slow, but also whether it was long enough. I appreciated that these two questions, which could be seen as inconsistent, actually recognised there is always a balance to be struck – especially where the inherited situation demands urgent action.

That is why, reflecting the commitment in our manifesto to “immediately update” the National Planning Policy Framework (NPPF), we moved as quickly as possible to develop and publish a draft for consultation – not just within our first 100 days but within our first month in office. The consultation is running for eight weeks and will close on 24 September, which I am confident will provide organisations across the public, private and third sectors sufficient time to consider and respond to our proposals; indeed at the time of writing, we have received 363 unique responses.

### *Providing certainty through the planning system*

I was also glad that you raised the importance of creating certainty in the planning system, in recognition I assume of the extreme uncertainty that was caused by the repeated chopping and changing of recent years. I trust that you will therefore welcome the fact we are moving to reform the system right at the start of this Parliament – updating the NPPF and prioritising the Planning and Infrastructure Bill in the first session – in order that it can provide the stable basis needed to underpin investment and development over the years ahead.

You also rightly asked how we intend to avoid unnecessary disruption to development and local plan making where it is in flight, again I assume informed by your experience in government of causing delays by taking a full year to consult on and confirm changes to planning policy. I can reassure you that we intend to respond to the current consultation within weeks and before the end of the year at the latest. We have also been pragmatic in our proposals, setting out transitional arrangements that balance the importance of adopting local plans with the need to unlock sufficient land for the houses we need. This approach is set out in Chapter 12 of the consultation, and detailed in the letter that I sent to every local authority Leader and Chief Executive on 30 July, a copy of which is available on GOV.UK.

### *Housing targets*

With respect to our proposed changes to housing targets, you were concerned that we were making them mandatory, yet at the same felt that London's should be higher. I am clear that housing targets are only meaningful if they are more than an advisory starting point, which is why the standard method will now be used as the basis for determining local authorities' housing requirements in all circumstances.

They also need to be credible – and as I said to the House, the current standard method meant London had a nominal target of almost 100,000 homes a year, based on an arbitrary uplift, which was absolute nonsense. This is a view shared by the development and wider housing sector. The new method produces a figure for London of nearly 81,000. This is more than double recent delivery, which was 35,305 in 2022/23, and which is expected to fall further this year. It is also more than half again above the figure set out in the current London Plan. It equates to more than 2% of stock per year, which is well over twice the average delivery rate we have seen across England over the last decade at 0.89%. It is the biggest proposed percentage increase against existing delivery of any region in the country by a significant margin.

More important than setting a deeply ambitious but credible target is of course meeting it. Too often the steps the last government took on this were performative rather than practical. This Government is committed to working in partnership with the Mayor of London and the GLA to drive up delivery – including by optimising density and through Green Belt review as the new London Plan comes together. This commitment to partnership is reflected in the new flexibilities we have agreed with the GLA for the Affordable Homes Programme to unlock delivery in London, with changes to deadlines for homes completing and tenure mix to enable some intermediate rent homes.

You also asked about the wider distribution of targets across the country, and whether it was right to be asking more of suburban and rural areas as well as urban ones – to which my answer is an unequivocal yes. We have a housing crisis, and while I appreciate that the last government's response was to bow to pressure from its backbenchers to scrap mandatory housing targets, this Labour Government refuses to sit by and let this crisis worsen. With housebuilding levels plummeting following the actions of the last government in December 2023, we are prepared to take the tough decisions needed to get homes built. This couldn't be more crucial: home ownership is out of reach for the average earner in all but two local authorities across England. Every area has to play its part in addressing soaring house prices and skyrocketing rents.

That is why the new method sees growth across the whole of the country. Our broader city regions see average growth of 30%. It addresses a consistent criticism of the old method, namely that it dragged down ambition in large areas of the North and Midlands where targets fell radically short of existing delivery and existing Local Plans. County Durham, Darlington, Hartlepool, Middlesbrough, Northumberland, Stockton-on-Tees, Sunderland, and Redcar and Cleveland build hundreds more homes each year than the target currently set for them – and in some inexplicable cases, the old target was not even three figures. The new method also drives a substantial increase in key southern cities central to driving growth: for example, Oxford's figure requires an increase versus current delivery of 141 per cent, and Cambridge's 70 per cent. And these targets do not represent the limit of our ambition: our New Towns Taskforce, under the leadership of Sir Michael Lyons, will be identifying possible locations for a string of major new settlements, with many delivered as urban extensions that will further unlock the economic potential of existing towns and cities.

You also requested clarification that there will be consequences for failing to deliver enough housing. I agree with you that there do need to be such consequences, and so I hope you will welcome the fact that we are proposing to reinstate the requirement to maintain a five-year housing land supply that the previous government removed last December. This requirement will sit alongside the Housing Delivery Test, which measures authorities' delivery record over the previous three years. Where authorities do not meet these tests, they will be subject to the presumption in favour of sustainable development as set out in the NPPF, and as per our consultation to applications outside of the Local Plan for development on brownfield and grey belt land in the Green Belt.

This Government recognises that more needs to be done to accelerate the delivery of large-scale housing developments that are not progressing as quickly as they could be. That is why, just last week, I announced the New Homes Accelerator, an expert team who will identify blockages, fix problems and support local authorities and developers to accelerate delivery and get shovels in the ground. As part of this initiative, I also launched a call for sites inviting developers, local authorities and landowners to come forward and flag large-scale housing developments that are delayed or stuck. This will help the Government better understand the scale of the problem across the country and determine the necessary support to overcome barriers to development and accelerate delivery.

Finally on this topic, you queried the fact that we are proposing to require authorities to cooperate where necessary to meet housing need, as a step towards a universal system of strategic planning across England. I would hope that this is another area where, having had time to review

the consultation, you will now agree that our proposals do the right thing in looking to support and facilitate cooperation – because as we said in our manifesto, housing need in England cannot be met without planning for growth on a larger than local scale.

### *Grey belt*

In relation to grey belt, you asked for further clarification as to what the limited contribution to the five Green Belt purposes means in planning terms. Recognising you would not have had time to study the consultation in detail before responding to my statement on 30 July, I expect that you will now have read both the proposed definition and the further proposed guidance. This makes clear that land which makes a limited contribution to the Green Belt purposes (which are set out in the NPPF) will not strongly perform against any Green Belt purpose *and* will have at least one of the following features:

- land containing substantial built development or which is fully enclosed by built form;
- land which makes no or very little contribution to preventing neighbouring towns from merging into one another;
- land which is dominated by urban land uses, including physical development; and
- land which contributes little to preserving the setting and special character of historic towns.

This definition excludes land of environmental value or assets of particular importance, as set out in footnote 7 of the NPPF, and assessments will be driven by locally led reviews. Critically, grey belt can only be built on where our golden rules will be met – delivering affordable housing, enhancing local nature and public access to green space, and providing the necessary local infrastructure, like schools and GP surgeries. This Labour Government is committed to ensuring that not only homes are built, but the right homes in the right places, with the amenities that local people need. For too long this has not been the case, and that must change.

### *Well-designed buildings and places*

Another issue on which I am sure your question was based on a limited review of our proposals related to references to beauty. I am clear that new homes should be high-quality, well-designed and sustainable. As the proposed NPPF continues to make clear, and as the consultation emphasises, beauty is an important objective of well-designed places. I will repeat what I said in the House: whether it is social, affordable or any other housing, it should be beautiful and should have character and style, and we are determined to make that happen.

The Government is not proposing to remove all references to 'beauty' from the NPPF. The changes we are making simply relate to additional references inserted by the previous government in December 2023, which architectural and planning professionals were concerned added additional subjectivity that risked inconsistency in decision-making.

The Royal Institute of British Architects has previously said the use of descriptive words such as "character" and "beauty" could be "problematic" if used in the wrong way in planning policy, because they were subjective issues open to interpretation and could mean that "necessary and otherwise high-quality development" is turned down.

The proposed reversals address that problem, while still ensuring that beauty is an important and explicit objective of well-designed places. There is already a clear framework through policy and guidance on how to achieve well-designed places as set out in the National Design Guide and National Model Design Code, enabling this to be decided by local planning authorities, working together with developers and the community.

### *Nationally Significant Infrastructure Projects*

In relation to Nationally Significant Infrastructure Projects (NSIP), you queried whether we had “dressed up” the difficult decisions we had to take on the proposed works to the A303 and A27 by pursuing early action on energy infrastructure. I fear this question reflects a defaulting to game playing when this Government is determined to be straight with the British people. As the Chancellor made clear in presenting the results of the Treasury’s public spending audit, if we cannot afford it, we cannot do it. The A303 and A27 are projects the previous government refused to publicly cancel despite knowing full well that they were unaffordable.

At the same time as taking these difficult decisions head on, we have moved quickly to make it easier to build the infrastructure we need. That is why on this Government’s fourth day in office we ended the ban on onshore wind, with that position formally reflected in the update to the NPPF. It is why we are proposing to: boost the weight that planning policy gives to the benefits associated with renewables; bring larger scale onshore wind projects back into the NSIP regime; change the threshold for solar development to reflect developments in solar technology; and bring more water infrastructure into the NSIP process. And it is why we will use the Planning and Infrastructure Bill to simplify the consenting process for major infrastructure projects and enable relevant, new and improved National Policy Statements to come forward, establishing a review process that provides the opportunity for them to be updated every five years, giving increased certainty to developers and communities.

### *Right to Buy*

With respect to affordable housing, you asked whether young people will still be able to exercise the Right to Buy. As I know from personal experience, the Right to Buy is a route for tenants who are otherwise priced out of the housing market to be able to own their own home. It will remain so under this Government. But it is also important that social housing is replaced, or that route will simply be closed for other families. Discounts have increased significantly, and we were clear in our manifesto that we would review the increases introduced in 2012. This review is underway. We will set out the findings and bring forward secondary legislation in the autumn. We will also launch a public consultation in the autumn on reforming Right to Buy more widely, including looking at eligibility criteria and protections for newly-built social housing.

### *Delivery by the market*

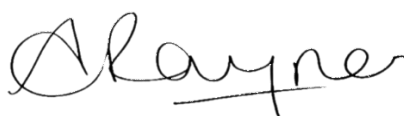
Finally, you implied that the changes we have proposed could prove challenging for developers to deliver, and asked about the overall economic health of the housing market. I hope you were reassured by the many positive responses from developers and investors to our proposals, including the statement issued by the Home Builders Federation, which made clear “industry stands ready to make changes to rapidly increase the pace at which homes are built”. As I made

clear to the House on 30 July, while our initial reforms are ambitious, I do of course recognise that the housing crisis cannot be fixed overnight – which is why the Government will publish a long-term housing strategy alongside the Spending Review.

I hope you will find this extra information helpful. I know that the depth of the housing crisis in which we find ourselves as a nation means you will – like me and every member of Parliament – feel not just a professional responsibility but a moral obligation to see more homes built. And I look forward to continuing our discussions on these topics, as it is only through scrutiny and challenge that we can deliver the best result for the public we both serve.

I will place a copy of this letter in the House of Commons Library.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A Rayner', written in a cursive style.

**Rt Hon Angela Rayner MP**

Deputy Prime Minister and Secretary of State for Housing, Communities & Local Government