



The Office of Louie French,
Member of Parliament for Old Bexley and Sidcup.
House of Commons,
London,
SW1A 0AA.

Planning Policy Consultation Team
Planning Directorate – Planning Policy Division
Ministry of Housing, Communities and Local Government
Floor 3, Fry Building
2 Marsham Street
London
SW1P 4DF

By email: PlanningPolicyConsultation@communities.gov.uk

24th September 2024

Dear Sir/ Madam,

I am writing to outline my concerns and objections to the Government's proposed changes to the National Planning Policy Framework (NPPF).

As a nation, we need to build more homes for current and future generations. However, this can only be achieved by respecting the local character, needs, wishes and, of course, our nature as a green and pleasant land.

In London, the answer must be gentle densification in the best-connected areas and beautifully built buildings to protect the capital's green spaces, preventing unsustainable urban sprawl and creating communities where people wish to live. However, this is not the approach the Labour Government is proposing, which is evidently putting partisan politics above sustainable policies.

Proposed housing target for Bexley

The Government proposes to increase Bexley's housing target from 1,295 to 1,801. This is a considerable rise compared to the old formula. It is also substantially higher than the 2021 London Plan's 685 homes target for the borough.

Bexley is only one of eight boroughs whose target will increase under the new formula. This is despite the Government proposing to lower London's overall housing target from 98,822 to 80,693.

The Government's rationale for cutting the capital's target by a fifth is that the old target is "nearly three times the current level of delivery". The proposals add: "While we must significantly ramp up the numbers in the capital, setting a target that is removed from reality just shifts numbers away from areas where they can be delivered".

Given the changes to Bexley's target, this justification is clearly flawed. Approximately 640 homes were built in the borough between 2020/21 and 2022/23, meaning the proposals require current levels of delivery to triple. Why is the Government asking Bexley to do something it thinks is "removed from reality" for London to achieve?

Your flawed targets also completely ignore the fact that Bexley suffers from some of the poorest infrastructure in London to support such a dramatic increase in housing numbers. For example, we do not have a tube station or an A&E.

Constituency Office:

19 Station Road, Sidcup, Kent, DA15 7EB.
Tel: 020 7219 5446 Email: louie.french.mp@parliament.uk
Website: www.louiefrench.org.uk



At the same time, you are cutting targets in Labour-run parts of central London, which have better infrastructure to support new homes and higher housing waiting lists. How do you explain such a flawed approach to development?

Impact on the Green Belt

One possible reason for this two-tier approach to housebuilding is the Labour Government wants to allow significant development on the Green Belt surrounding Bexley, which would be firmly against local wishes. We might be a London borough, but beautiful Bexley and our unique character have more in common with Kent.

Under the proposed changes, the Government will instruct councils who cannot meet their housing targets to release Green Belt land for development. This would be enforced if local authorities cannot demonstrate a 5-year land supply or deliver less than 75% against the Housing Delivery Test. My constituents will suspect that tripling Bexley's housing targets against current delivery is a deliberate attempt to trigger a Green Belt review against local wishes.

I also strongly doubt that the proposed 'golden rules' around the development of the Green Belt will work. The requirement that 50% of homes built be affordable while ensuring developments deliver matching infrastructure is unachievable in many areas. This affordability target in the London Plan is rarely met because it often makes many developments unviable. Therefore, it is unrealistic to expect sufficient investment to deliver the necessary infrastructure to support such an increase in housing targets, including GP surgeries, roads, public transport, and schools.

There is a false assumption that the Green Belt within London would be well-connected or have the necessary infrastructure or public services nearby. This is not the case in the parts of my constituency with the most Green Belt. In Coldblow and North Cray, new residents often cannot register with GPs locally. They also have little or no access to public transport.

Bexley Village and parts of Sidcup are already heavily congested and were never designed to sit on an important north-south route in the borough. Our roads are also constantly being dug up because the Victorian-era infrastructure used by the likes of Thames Water regularly breaks under the pressures of an increased population. Substantial development to meet Bexley's proposed target in these communities with already insufficient infrastructure would be undeliverable, problematic, and unsustainable.

The third golden rule, ensuring access to nature and green spaces while pressuring local authorities to release Green Belt land, would have unintended consequences in Bexley. While the Government views much of this land as of poor quality, on the contrary, much of it locally is also designated Sites of Importance for Nature Conservation. This is especially true of Footh Cray Meadows and the land surrounding Sidcup Place. The proposals will inevitably impact nature locally, especially near Bexley Village, while removing protections that ensure already developed towns like Sidcup and Welling have access to green spaces.

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Building the family homes Bexley needs

Bexley's recent Strategic Market Assessment shows that the borough needs more family homes, especially those with three bedrooms or more. The threat posed by the Government's unrealistic housing target is that to achieve the number of homes demanded, Bexley will have to build tall and small, which is out of line with the housing mix we know our borough needs. This type of development substantially differs from the type and mix of homes much of Bexley currently has. This situation worsens when the Government proposes to remove rules that ensure the local character is considered when judging planning authorities' ability to meet housing needs.

By focusing on target numbers rather than the size and type of homes an area requires, this Labour Government is repeating the same mistakes that the Labour Mayor of London has made since taking office. London needs family-sized homes, not rabbit hutches in which families cannot live. The failure to deliver family-sized homes is why so many central London boroughs cannot house families in their communities and why families are increasingly dumped in unfamiliar areas with little support, crowding out local families in the likes of Bexley and increasing the costs to local authorities.

The problem with Grey Belt

While the Government clearly thinks identifying and releasing so-called 'Grey Belt' land will solve the land supply problem, there is not as much as they think. Work by the Centre for Policy Studies and Create Streets shows that only a minuscule amount of Green Belt land in Bexley could be described as 'Grey Belt'. This is similar across the country, with only 4% of Green Belt land already built on. This again shows the false assumption the Government is working under in devising its planning proposals.

However, this newly poorly defined designation poses a significant risk to the Green Belt. It is likely to result in litigation from landowners seeking to remove protections from their land to enable inappropriate and unsustainable development. This will be costly to local authorities and override local communities' wishes. There is already a significant problem of rogue developers ignoring the planning system, racing to build on green land before the councils and the courts can act. While Bexley Council takes a zero-tolerance approach, it is expensive and time-consuming for local authorities. There is a real danger these rogue developers are encouraged to wreck Green Belt land, fight a protracted legal battle and then hope to secure 'Grey Belt' status.

It will also encourage developers to take this approach rather than build and regenerate more challenging sites, which are better connected in the likes of zone 2 & 3 London.

Conclusion

The two-tier approach of setting Bexley a housing target that the Government thinks London cannot achieve shows the major flaw in your approach.

These proposals are unrealistic and will not deliver the homes Bexley needs without significantly damaging local green spaces and nature. The golden rules are not fit to deliver the necessary infrastructure, nor will they be sufficient to gain local consent.

The 'Grey Belt' is poorly defined and insufficient to meet the land demanded by the target. The clear intention is to force a green belt review in Bexley against local wishes and burden communities that already lack sufficient infrastructure.

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I believe this approach is flawed for the reasons given and will inevitably run aground with local opposition. The Government's clear intention of removing local controls is no answer to this. I strongly urge the Government to reconsider and change direction to achieve sustainable development that supports both current and future generations.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Louie French'.

Louie French,
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