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

24 September 2024

Dear Sir or Madam,

**We are writing as Members of Parliament representing constituencies in the London Borough of Bromley to express our concerns about the proposed changes to the National Policy Planning Framework and their impact on local decision-making in the Bromley and Biggin Hill and Orpington constituencies.**

It is unquestionable that, as a nation and a city, we need to build more homes. There has been a chronic undersupply of housing for years with very high levels of immigration. The result is unaffordable house prices and rising rents. This is an untenable situation for young people, dashing hopes of homeownership, denying space for families to grow, and suppressing economic growth.

Homeownership may be above the English average - and far above the London level - but the housing shortage is evident in the London Borough of Bromley. The average home costs £520,000, far exceeding local wages, and rents over £1,550, which consumes most people's pay.

There is a need for more homes locally to house a new generation. The question is how we deliver that housing, ensuring we build communities people wish to live in whilst protecting the unique character and green spaces that make Bromley a desirable place to live.

**We do not believe that the proposals outlined by the Labour government get this right.**

The Government say that asking London to deliver nearly three times as many homes as current delivery is "removed from reality". This is the stated reason for reducing London's overall housing target from nearly 100,000 to just over 80,000.

Yet, the Government's proposals nearly quadruple Bromley's housing target from 774 in the 2021 London Plan to 2,805. This is unachievable without urban sprawl and is - by the same logic the Government uses to lower London's target - "removed from reality".

The consequence of the Government's housing target and the planning changes is that Bromley Council will be forced to release Green Belt land against the wishes of local people. Over ten years, the housing target will be the equivalent of building over three new Bromley towns covering an area the size of 1,170 football pitches.

There simply isn't enough Brownfield or 'Grey Belt' land available to do this without building on the Green Belt.

**The Government must be honest with people: their planning changes will result in a**

## **substantial loss of the Green Belt in Bromley and Biggin Hill and Orpington.**

Under the proposed changes, local communities will lose decision-making powers over Green Belt protections. The Government will force local planning authorities to review the Green Belt if they miss their targets. Given the enormous increase in Bromley's housing target this will immediately impact us.

Instead of protecting the Green Belt while delivering new homes like the previous planning rules, the Government's proposals will open the door to paving over swathes of the Green Belt. It proposes five tests to test the quality of the Green Belt; this system will effectively open the door to the development of far more than the low-quality 'Grey Belt' the Government claims.

It is a myth that Green Belt land in London is well-connected, near local amenities, and has sufficient infrastructure. The vast majority of Green Belt land in the constituencies we are proud to represent is only reachable by small country lanes. For example, much of the land surrounding Biggin Hill is served by a single artery road that connects the village to the rest of the borough. The village has few reliable public transport connections and is an example of a place where development in line with Sadiq Khan's London Plan is wildly impractical, yet the Government would have Bromley approve swathes of housebuilding near it.

This is the problem with the Government's golden rules for the development of Green Belt, which require (i) 50% of homes built to be affordable, (ii) necessary infrastructure, including schools, GP surgeries, and public transport, to be delivered, (iii) access to nature to be protected fall apart. In the case of the example given above, it is difficult to see how any site could be viable with half of all homes affordable and the necessary contribution to nearby infrastructure. In parts of the Green Belt closer to amenities like Bromley Common, you are eroding access to nature for a major market town.

We want to see more homes built to house a new generation. But this is a recipe for unsustainable, unpopular and undeliverable urban sprawl. Removing consideration for local character when determining housing needs and abandoning the previous government's plans to build beautiful will further undermine public support for these changes. And instead of encouraging developers to bring forward plans to densify our communities gently, they will be a race to sprawl.

For these reasons, we fully support Bromley Council's submission to the consultation.

Yours faithfully,

Peter Fortune MP  
Bromley and Biggin Hill

Gareth Bacon MP  
Orpington

