

**BLAKE STEPHENSON MP**  
Member of Parliament for Mid Bedfordshire



HOUSE OF COMMONS  
LONDON SW1A 0AA

**The Rt. Hon. Angela Rayner MP**

Deputy Prime Minister & Secretary of State for Housing, Communities & Local Government  
Ministry for Housing, Communities & Local Government  
2 Marsham Street  
London  
SW1P 4DF

Dear Angela,

**Consultation on the Proposed Reforms to the National Planning Policy Framework**

Good planning has the power to shape communities for the better – and transform the lives of our constituents, whether they are looking for their first home, somewhere to grow a family, or somewhere to settle down in retirement.

There are lots of things to be proud of as the Member of Parliament for Mid Bedfordshire. Whether that's our historic towns and villages, our beautiful natural environment – stretching from the Chilterns to the Marston Vale Forest, or the fantastic people who live and work here.

Mid Bedfordshire has led the way on house building over recent years. The new settlement of Wixams – first settled in 2009 – is a growing and flourishing town. Many of our towns and villages have grown. The Stewartby Brickworks could – subject to Government support - soon be home to a huge investment from Universal Studios. And the clay pits that once fed it have been turned over to nature through the Marston Vale Community Forest.

***Housing targets***

We have made difficult choices over the years to meet our housing targets, and, in both Bedford Borough and Central Bedfordshire, we are currently delivering more houses than our new housing targets. But I am deeply concerned that the planned reforms to the National Planning Policy Framework could leave our area having to take **more than our fair share** on housing because we have made those difficult choices.

That's because Luton Borough Council have consistently under-delivered on housing and a strengthened requirement to mandatory housing targets with greater emphasis on "sharing need with neighbouring authorities" could result in Central Bedfordshire being forced to **pay the price** of Luton's failure to deliver gentle densification within the Borough's limits rather than sprawling laterally up to its administrative boundary and into the countryside. I believe that the Government needs to make it clearer that the ability to share need with neighbouring local authority areas should be an absolute last resort – and that significant, Government-backed work to unlock all available brownfield land and opportunities to build up rather than out should take place *before* any consideration is given to building those dwellings elsewhere.

In a similar vein, I am **concerned by the Government's decision to reduce London's housing target** – from 100,000 to 80,000. I understand that the Government wishes to deliver on its manifesto commitment to deliver 300,000 houses every year and it may have some concerns about the ability of London's Mayor Khan to provide the leadership needed to deliver sufficient houses, but

our focus should be on increasing density in urban areas where there is existing infrastructure and jobs, and where people want to live, like London, Birmingham and Manchester, not building sprawling suburbs from and dormitories for London on our beautiful countryside.

I know that the Government shares my view that this is how we should plan for development, because I support their proposal to strengthen "expectations that plans should promote **an uplift in density in urban areas**". I would urge you to apply that same expectation in London and seek to deliver the full 100,000 houses per year the original formula would have required.

### ***Five-Year Land Supply***

The Government's proposals on the five-year land supply mean, in effect, that Councils that are unable to demonstrate a five-year supply of housing lose their protections from speculative development. The Government also proposes to remove consideration of previous over-supply from five-year land supply rules.

Whilst I understand the Government's view that these rules will increase the supply of housing, I have concerns that it might achieve the opposite. I think these rules could have five main impacts:

- 1) They will disincentivise Councils who want to work at pace to deliver housing projects in the early stages of their Local Plan.** Delivering enough housing for the whole 15-year Local Plan period within the first five years of a Local Plan is something that should be encouraged, but under these plans doing so would see Councils failing to meet their housing supply targets after the last bricks were laid and forced to take speculative development.
- 2) They will disincentivise ambitious Councils planning for the long-term.** Councils who wish to deliver new towns and ambitious strategic development sites might find themselves facing a choice between planning for the longer-term and planning for the next five years. Disincentivising good, long-term development means we do not get the large new developments and infrastructure that we need.
- 3) They will reduce the value of plan-making.** These changes will offer Councils two basic options: invest resources in the constant production and re-production of Local Plans; or accept that you will have fewer protections and allow developer-led development in your area. Our communities need plan-led development, but I am concerned that the incentive structure that these changes will create will result in more Councils taking the latter approach.
- 4) They will undermine public goodwill towards the delivery of housing.** Local communities are broadly understanding of the need to build more homes – and support good, well-planned development. But if the reward for working with local politicians to deliver large scale housing developments in their area quickly is to see the protections for the field next door greatly reduced, they will quickly come to believe that the best way to keep a five-year land supply is to delay the delivery of Local Plan sites. That will slow down the entire process.
- 5) They will promote bad development.** Whether that is the greater speculative development that will inevitably result from these proposals or the changes to Council incentive structures around easy-to-deliver developments, these changes will result in bad developments. Bad development means the public become less supportive of development – and that slows down the delivery of housing supply.

I would like to propose an alternative approach. I believe that we should move away from the concept of a five-year land supply, and the presumption in favour of sustainable development in the green belt should only apply in one of the following circumstances:

- 1) A Council does not have an up-to-date Local Plan, in which case unplanned development may be necessary to deliver their housing needs.
- 2) A Council does have an up-to-date Local Plan, but more than 25% of its allocated sites are now unlikely to come forward within the Local Plan period. If the Council cannot demonstrate in the latter case how it intends to replace these with planned sites – perhaps in a new Local Plan – then unplanned development up to the amount missing may be appropriate.

### ***Infrastructure***

We all know that the main objection many of our residents have to development is historic broken promises on the delivery of new infrastructure. Whether it is undelivered road projects, non-existent GP surgeries, crowded schools, or something else, too many of our communities have suffered from bad development.

I believe that the golden rules on infrastructure set out in the consultation are sensible, but I would like to see them reinforced by a requirement that necessary infrastructure is delivered early on in development – preferably before the first houses can be occupied.

I would like to see the Government commit to reforms to the way infrastructure is funded in new developments. Specifically, I believe that the Government should provide local authorities with up-front capital funding to deliver necessary infrastructure like GP surgeries, schools, and hospitals. This funding could then be claimed back by the Government through developer contributions once housing has been delivered.

### ***The Grey Belt***

The Government has identified a category of the Green Belt called “Grey Belt” which it believes should be targeted for development. This category is broadly categorised as Previously Developed Land in the Green Belt or similar land which is of low quality. I do not agree with the Government’s approach here and do not believe that these sites represent obvious locations for strategic development.

I will give an example. A disused former petrol station surrounded by rolling fields on a quiet road. Under the Government’s proposals, this would be an ideal location for housing, but it has limited access to infrastructure and is not obviously a sustainable location. And the potential expansion of the definition of Previously Developed Land to include hardstanding and glasshouses would open up many thousands of similar small sites, surrounded by and part of the countryside, but completely inappropriate for housing developments.

These sites, where they are identified, should instead be allocated to be restored to nature. This also supports the ambition the Government has set out to “bring about positive improvements for the quality and enjoyment of the environment”.

Furthermore, the proposed Grey Belt definition creates a loophole that developers can and are likely to exploit to secure development. For example, a developer could purchase a farm which is inappropriate for large-scale development, find a form of development – perhaps a farm shop and car park – secure planning permission, and then use that “previously developed land” to secure “Grey Belt” status in a future Local Plan.

If the Government intends to pursue its Grey Belt policy, safeguards should be put in place to ensure that land:

- 1) Was “previously developed” for a considerable period of time – 15 years might be sensible – before it can be classified as “Grey Belt”, and

- 2) Is within or immediately adjacent to a significant urban area (I would suggest a population-based criteria for significant urban area, perhaps 5,000+).

### ***Nature Recovery***

As set out in the previous section, I believe that the "Grey Belt" should primarily be set aside for nature recovery. But I also believe that we need to go further to ensure that we leave our natural environment in a better state than we found it. In Mid Bedfordshire, we have some fantastic projects, like the Bedford-Milton Keynes Waterway Park and the Marston Vale Community Forest, where we see nature restored and made accessible for people to enjoy.

In this consultation, the Government has asked for views on the role that Local Nature Recovery Strategies can play in identifying areas of Green Belt which can be enhanced. I believe that these strategies should be integrated with Local Plans and that Plans, in addition to identifying sites for development and infrastructure, should also be required to identify areas of Green Belt which are allocated for nature recovery.

These areas should meet one of three criteria:

- 1) Previously Developed Land in the Green Belt which has fallen into disuse, or
- 2) Have the potential to play a significant role in promoting the relevant characteristics of a local National Landscape Area or National Character Area, or
- 3) Have a significant Green Belt purpose which makes them unsuitable for future development, including sites on the edges of existing settlements – defining those external boundaries for the longer-term.

### ***Beautiful Development***

I want to end by addressing the decision to remove the requirement that development be beautiful. I understand why this decision has been made – beautiful developments cost more and take longer, so they are less attractive to big developers. But they are significantly more attractive to the people who live there – and the people who live nearby. If the Government wants to win the support of people in Mid Bedfordshire to their plans to build hundreds of thousands of new homes, the Government might do well to remember that the best way to speed up development is to do it in a way that local people can support.

I trust that this consultation response was helpful, and I look forward to studying your plans closely as they evolve.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Blake', with a horizontal line underneath.

**Blake Stephenson MP**  
Member of Parliament for Mid Bedfordshire