

## **Bexley Local Plan**

### **Matter 2 – Spatial Strategy**

#### **(Policy SP1)**

**2.1 Is the Spatial Strategy as set out in policy SP1 based on robust evidence, justified having regard to the amount and type of development proposed in the plan, and in general conformity with the London Plan and:**

**(a) does it give sufficient priority to, and adequate guidance for, development, throughout the plan period of the (i) Thamesmead and Abbey Wood Opportunity Area and the (ii) Bexley Riverside Opportunity Area?**

**(b) are the identified Sustainable Development Locations justified and effective?**

The approach is unjustified and ineffective. Local Plan policy SP1 establishes a policy regime for the release of land for residential development that is too restrictive. The Council's approach is not supported by the London Plan.

Policy SP1 parts 3 and 4 state the following:

#### **Bexley's sustainable development locations**

3. The parts of the borough best able to accommodate, at varying densities and amounts, the housing, industrial and commercial growth identified for Bexley, including most of its supporting infrastructure, services and facilities, are:

a) the locations within the blue boundaries on the key diagram (Figure 1), which illustrate:

- i. areas within 800 metres walking distance of, and including, Bexley's main town centres and 400 metres from local town centres;
- ii. areas in the borough within 800 metres of railway stations that have a corresponding town centre nearby and 400 metres where the station has no adjacent town centre; and,
- iii. areas with public transport access levels (PTALs) of 3-6;

b) designated industrial locations (specifically for industrial growth and intensification); and

c) within the remainder of the Thamesmead and Abbey Wood London Plan Opportunity Area not covered in parts 3a or b.

4. Development proposals outside of these areas will only be supported where they demonstrably contribute to sustainable development, respect local character and are supported by the required infrastructure.

In essence, the Bexley Local Plan is saying that only development within the Sustainable Development Locations will be supported. Outside of these areas, the principle of residential development – whether a site can be developed for housing - is far more uncertain.

This is unjustified in London where there is such a large and unmet housing need and where London Plan policy seeks to increase the supply of homes through small sites.

We are aware of the Council's document titled *Local Plan Spatial Strategy Technical Paper Applying a local approach to define Bexley's sustainable development locations*. This paper explains the Council's approach to identifying appropriate locations for residential development in the Borough. This report maintains that housing supply outside of defined walking areas to rail stations / town centres (to a maximum of 800m) is unsustainable and therefore there is a presumption against the release of residential sites outside of these zones.

We contend that this is a narrow reading of the London Plan and Part 4 creates too much uncertainty for small site delivery in a borough where small sites are supposed to account for 45% of all delivery in the first ten years. In addition, we are concerned that the Council has relatively few small site allocations.

London Plan Policy H2, part B states:

B. To ensure that ten-year housing targets are achieved, boroughs should:

- 1) prepare delivery-focused Development Plans which:
  - a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification
  - b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2
  - c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.

As can be read, B1 a) and b) would support the allocation of housing sites in areas of the borough outside of the Council's Sustainable Development Locations.

London Plan Policy H2, B2 goes onto state:

- 2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially (our emphasis) the following sources of capacity:
    - a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary;
    - b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets;
    - c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses;
    - d) the redevelopment of surplus utilities and public sector owned sites; and
    - e) small sites (see Policy H2 Small sites)
    - f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.
- 3

The London Plan, consequently, seeks to optimise the supply of homes on land falling within categories a) to f) but not exclusively. Other areas can be suitable. It is our view that the Sustainable Development locations are drawn too narrowly. This will militate against the delivery of housing in otherwise suitable locations. Investigation of the areas outside of the defined locations shows that many of the areas have local shops, post offices and small supermarkets. Consideration of the Submission Policies Map and Figure 1 – the Key Spatial Diagram for Bexley in the Local Plan, show no site allocations south of the A207 except for the allocations huddled around the town centres of Crayford and Bexleyheath.

There appear to be no site allocations made in the town centres of Sidcup and Bexley and around the train station at Albany Park. Sidcup has a train station that takes 30 minutes to Charing Cross, as well as stopping at major employment centres around London Bridge and Waterloo along the way.

The areas south and east of Danson Park and around Vallies Wood on the border with Greenwich have no allocations.

The area around Falconwood, which despite having a train station, is not located within a Sustainable Development location.

The large area south of the A206 - Bedonwell – is also off limits, even though there is a Sainsbury's at the junction of King Harold's Way, Brampton Road, and Oakhampton Crescent.

The area east of Barnehurst station is off limits although there is a bus route serving Parkside Ave and Northhall Road.

We mention these areas merely as examples to illustrate a point. Some of these areas may not be so well served as other locations by public transport but the 800m maxim is merely a guide, not a fixed rule. Having said that, all these excluded areas are served by buses, and for able-bodied people a walk or a cycle-ride of one kilometre or more is not an insuperable barrier.

As we argued in our original representation on the Local Plan, we acknowledge that Bexley has poorer levels of public transport services compared to other London boroughs – e.g., it has no Tube or Overground services, but the Local Plan Transport Assessment reveals that Bexley has a comprehensive bus network. This is illustrated in figure 3.7 on page 17 of the report:



Figure 3.7 Bus Route Network

The accompanying text to Figure 3.7 also states:

*Figure 3.7 shows the borough’s bus route network and the level of service (buses per hour) on parts of the network. Buses have a reasonably good penetration across the borough as a whole.*

The density of the bus network would enable residents in new homes outside of the Sustainable Development locations to access services (shops and surgeries) or train stations that can then carry them to employment / services locations towards central London.

Furthermore, the Council observes at paragraph 3.21 of its Local Plan Transport Assessment:

*Once the Elizabeth line services start at Abbey Wood (expected to be in 2022 at the time of writing), London Buses has plans to reorganise local routes to provide better access and increased capacity. A new route 301 between Bexleyheath and Woolwich via Abbey Wood was introduced in July 2019.*

Table 3.1 of the report shows that Bexley has a higher average public transport accessibility level (PTAL) than the London boroughs of Havering and Hillingdon, and the same level as Enfield. It should be noted that all three of these boroughs have higher housing targets set by the London Plan 2021 than Bexley, despite having lower or comparable PTAL levels:

Bexley	685dpa
Hillingdon	1083dpa
Havering	1285dpa
Enfield	1246dpa

Bexley borough is also well served by mainline rail services. This is illustrated by figure 3.10 of the Local Transport Assessment Report. For example, excluding the large area south from Bexleyheath and north from Sidcup – the area around Danson Park – from development appears unjustified when Sidcup high street has train stations at Albany Park and Sidcup as well as frequent bus services. This is eminently walkable / cyclable. So is the area south of Belvedere, which is accessible for the able-bodied able to walk or cycle to the train stations at Bexleyheath or Belvedere / Abbey Wood. The area north of Crayford and south of Erith is also easily accessible for those able to walk and cycle.

The lack of housing site designations around the train stations of Sidcup, Albany Park and Bexley is particularly questionable.

It is unjustified to exclude large parts of the borough from making a potential contribution to housing supply, including the large area to the south of the A207 that includes the town centres of Bexley and Sidcup that have train stations and are served by buses and where people can reach easily the train stations of Bexleyheath by foot or by bike.

The Council should work to identify more sites, especially small sites, in these excluded locations. This is doubly necessary if, as the Council argues in paragraph 1.18, that the Bexley Riverside Opportunity Area will not fulfil the potential expected of it by the London Plan, including 6,000 homes (Table 2.1 of the London Plan).

**(c) is it (and policies DP1(1), DP2(1) and SP2(3c and 4)) too restrictive of development outside the identified Sustainable Development Locations?**

DP1 (1) is too restrictive for the reasons we have given above.

DP2 (1) is too restrictive and will prevent small sites from coming forward in areas outside of the Sustainable Development Locations, even though the additional demand they will place on public infrastructure would be very limited. This restrictive approach is not supported by the London Plan. This would militate against the development of otherwise suitable brownfield sites for housing.

The scale of the unmet housing need in London (when judged against the London Plan) and the evidence in the SHMA of a housing need in the Bexley that is much greater than the target assigned to the Council by the London Plan justifies an alternative approach.

**(d) is it (and policy SP3) realistic in its requirement to intensify the use of industrial land?**

The Panel examining the London Plan expressed doubt about the ability to co-locate residential with industrial uses (paragraph 427 of the Panel Report). The Panel noted that the policy was unlikely to make a significant contribution to the London Plan housing targets. We agree. However, locating new housing closer to new employment locations would be beneficial, which is the aim of SP3, part 4, A. This states:

*a) reducing residents' need to travel long distances by supporting the creation of a diverse local economy that offers a wide range of well-connected local job opportunities, particularly in Bexley's designated industrial locations, town centres, neighbourhood parades and other places of employment including education and healthcare;*

We note the designation of Sidcup as a Creative Enterprise Zone in Policy SP3. Yet, despite this, this is an area with no specific residential allocations.

**James Stevens**  
**Director for Cities**