



Fixing our broken housing market

Response to the White Paper Consultation

From

The London Green Belt Council

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Response from the London Green Belt Council

Question 1 - Do you agree with the proposals to:

Question 1 (a) - Make clear in the National Planning Policy Framework that the key strategic policies that each local planning authority should maintain are those set out currently at paragraph 156 of the Framework, with an additional requirement to plan for the allocations needed to deliver the area's housing requirement?

The London Green Belt Council has major concerns about Green Belt boundaries. The permanence of the London Green Belt is essential for any forward strategic planning. The regular review of local plans will put continuous pressure on Green Belt boundaries with the likely effect of the Green Belt being eaten further eroded.

Local authorities will be tempted or even forced to take further Green Belt land instead of providing protection as required under the NPPF.

In order to create a more attractive and well-used Green Belt, there needs to be a long term strategic plan which should only be reviewed every 20 years to allow forward looking strategies to be created and carried out.

Question 1 (b) - Use regulations to allow Spatial Development Strategies to allocate strategic sites, where these strategies require unanimous agreement of the members of the combined authority?

If these special strategies include Green Belt then they should be considered in a way where the presumption is that the protection of Green Belt so that it can only be used after special consideration ensuring all other options have been considered.

There is considerable scepticism as to how housing targets are being calculated. Some are exaggerated and ill-founded.

This puts considerable pressure on local authorities with a lack of a five-year housing supply, to make further encroachment into the countryside and especially into Green Belt.

These housing figures are further manipulated by large developers and land-bankers who deliberately hold back land, some of which has planning permission, in order to put further pressure on planning authorities.

There is a very real danger that a "sufficiently ambitious" plan may lead to the setting of unrealistic housing targets that cannot be met.

Question 1 (c) Revise the National Planning Policy Framework to tighten the definition of what evidence is required to support a 'sound' plan?

A sound plan should be one that preserves designated landscapes, such as Green Belt, for future generations.

Question 2 - What changes do you think would support more proportionate consultation and examination procedures for different types of plan and to ensure that different levels of plans work together?

No comment

Question 3 - Do you agree with the proposals to:

Question 3 (a) - amend national policy so that local planning authorities are expected to have clear policies for addressing the housing requirements of groups with particular needs, such as older and disabled people?

Yes

Question 3 (b) - from early 2018, use a standardised approach to assessing housing requirements as the baseline for five-year housing supply calculations and monitoring housing delivery, in the absence of an up-to-date plan?

A standardised approach to housing figures would be a helpful step as the present system is misunderstood. It is also important for government to be seen to be acting with accuracy and consistency.

Any such figures should realistically take into account the ability to build the required houses based on building rates achieved by the private sector.

Unrealistic housing targets put considerable pressure on Green Belt land.

Question 4 - Do you agree with the proposals to amend the presumption in favour of sustainable development so that:

Sustainable development appears to have several different interpretations both by LPAs and Inspectors.

As we understand it, the three areas which contribute to sustainable development are economic, social and environmental and that they carry equal weight in any planning decision. From experience, some LPAs and Inspectors put far too much weight on the economic aspects of a planning application/appeal than on the other two. The environment usually comes a poor third to the other two.

As a result, planning decisions are being made which are not environmentally favourable or a danger to health.

Some of the planning permissions given for Green Belt land not sustainable as they are in isolated areas with little infrastructure. County Councils are then required to provide roads and schools with very little in the way of funding.

Brownfield land is normally in or near a built-up area so requiring little further expense in order to make it sustainable.

Question 4 (a) - authorities are expected to have a clear strategy for maximising the use of suitable land in their areas?

Authorities are expected to have a clear strategy for maximising the use of suitable land in their areas.

The definition of “suitable land” is important for this consideration. There are many LPAs in the area around London having Green Belt in their boundaries and already they are interpreting the NPPF in different ways.

There are important environmental reasons why the Green Belt should not be considered “suitable” under any circumstances including those reducing the risk of flooding and improving air quality. It is for these reasons the London Green Belt should be excluded from the definition of “suitable land”.

Question 4 (b) - it makes clear that identified development needs should be accommodated unless there are strong reasons for not doing so set out in the NPPF?

Experience has shown that where LPAs have large areas of Green Belt in their district boundaries, they are being forced to use this Green Belt land for housing need and the “protections” of the NPPF are being ignored.

Unless there is some guidance and acknowledgement for LPAs with Green Belt taking account of the housing that they would then be able to provide in the remainder of their district, this could be a licence for much more building in the Green Belt.

The LGBC would not agree with this question as anything that weakens the preservation of the green belt would be unacceptable.

Question 4 (c) - the list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the National Planning Policy Framework (so these are no longer presented as examples), with the addition of Ancient Woodland and aged or veteran trees?

The list of policies which the Government regards as providing reasons to restrict development is limited to those set out currently in footnote 9 of the NPPF where they are listed as examples), with the addition of Ancient Woodland and aged or veteran trees?

We welcome these changes to footnote 9 but would suggest that they should no longer be a footnote but have more prominence in the NPPF. This would ensure that LPAs give them proper consideration.

We also believe that some of the policies in the NPPF which refer to the list in footnote 9 need to be strengthened as a result of this change.

Question 4 (d) - its considerations are re-ordered and numbered, the opening text is simplified and specific references to local plans are removed?

We believe that any simplification of the NPPF is to be welcomed.

Question 5 – Do you agree that regulations should be amended so that all local planning authorities are able to dispose of land with benefit of planning consent which they have granted to themselves.

Key to this suggestion is the use of the land. There is a case in the London Green Belt at present where the council owns a playing field. In these circumstances we would be concerned that it was able to give itself planning permission and build on the land.

We suggest that where land owned by LPAs is designated, such as Green Belt, this suggestion does not apply.

Question 6 - How could land pooling make a more effective contribution to assembling land, and what additional powers or capacity would allow local authorities to play a more active role in land assembly (such as where 'ransom strips' delay or prevent development)?

No comment

Question 7 - Do you agree that national policy should be amended to encourage local planning authorities to consider the social and economic benefits of estate regeneration when preparing their plans and in decisions on applications, and use their planning powers to help deliver estate regeneration to a high standard.

One of the most important requirements of the Green Belt is to prevent urban sprawl and to encourage regeneration in the cities and towns, so we would strongly support this suggestion.

The locations in London with the highest densities of homes per hectare are most attractive to home owners and renters, the Georgian and Edwardian squares in Kensington and Chelsea. They are an example of the type of high standard building which give an example for regeneration. They support the community concept and are a social benefit.

Many areas in London are in need of regeneration. With high standards of development, excellent accommodation could be provided to those who cannot afford to buy or rent at present. In addition, they could create communities in inner city areas.

In providing this accommodation the pressure on green belt land is likely to reduce.

Question 8 – Do you agree with the proposals to amend the NPPF to:

Question 8 (a) – highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing?

LGBC support the concept of neighbourhood planning.

Question 8 (b) – encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the authority's housing needs?

We would support initiatives that would assist in helping villages thrive. However this needs careful interpretation of what this means. Development needs to be of a high standard.

The definition of a thriving village needs to be clear and not include such increased development that will double the size of the village.

Question 8 (c) – give stronger support for rural exception sites – to make clear that these should be considered positively where they can contribute to meeting identified local housing needs, even if this relies on an element of general market housing to ensure that homes are genuinely affordable for local people.

We would support the principle of exception sites but not if they have to be funded by market housing. So far these sites have been achieved in many areas without the need for market housing by specialist housing associations.

Any developer is likely to exaggerate the amount of market housing required and the type of housing which in the Green Belt is likely to be 5/6 bedroomed houses.

Government needs to consider the situation of “right to buy” of rural affordable houses as they will be needed by young people, who cannot afford to buy in the village without

whom most villages would have little or no social mix. These homes should be kept for young people in perpetuity.

Question 8 (d) - make clear that on top of the allowance made for windfall sites, at least 10% of sites allocated for residential development in local plans should be sites of half a hectare or less?

No comment

Question 8 (e) expect local planning authorities to work with developers to encourage the sub-division of large sites? and

No comment

Question 8 (f) encourage greater use of Local Development Orders and area-wide design codes so that small sites may be brought forward for development more quickly?

No comment

Question 9 - How could streamlined planning procedures support innovation and high-quality development in new garden towns and villages?

No comment

Question 10 – Do you agree with the proposals to amend the NPPF to make clear that:

Question 10 (a) – authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements?

The LGBC does not accept, in principle, that any further green belt land should be released for development. A principle characteristic of Green Belt is its permanence. If land is still serving the purposes of Green Belt then there cannot be any need to change the boundaries.

There have been and are planned major incursions into the London Green Belt. These have mainly been justified by LPAs on the basis that they would be unable to provide their OAN. The reason given by LPAs for Green Belt incursion is that a lack of a five-year housing supply is “exceptional circumstances”. Some Inspectors at EIPs have not only accepted this argument but have actively encouraged councils to use the argument. These grounds have also been accepted at planning inquiries.

We welcome the strengthening of the requirements around these alternatives but have concerns as to how the proposals will be interpreted and whether they are strong enough. They are worded in a way that could easily justify the use of Green Belt.

For example:

“The potential offered by land which is currently underused”

- how will the decision be made as to whether a parcel of land is underused or not?

“Optimising the proposed density of development” -

- how will the density be calculated and what levels will be set by Government?
Developers are prone to build houses with the best profit and this would count against “high density” solutions.

“Exploring whether other authorities can help to meet some of the identified development requirement”.

- this is already supposed to be taking place but when the adjoining authority also has a large percentage of green belt land, they are in a similar position and agreement very unlikely.

The test gives no guidance on preventing large scale or cumulative Green Belt erosion through the amount or extent of any incursions.

In order to protect the Green Belt, we would want to see any encroachment called in by the Minister and a set of clear guidelines created to stop ad hoc decisions taken by LPAs

Ideally, we want the London Green Belt treated like a national park with its own planning authority in order to ensure consistency and strictly regulate any incursion into its boundaries.

Where an LPA is unable to meet its housing targets in full, due to the fact that most of the land within its boundaries is Green Belt, is not mentioned in this section of the White Paper. Surely any LPA in this position should be able to apply for dispensation in order to protect its Green Belt and to fulfil one of its essential purposes – to separate communities. We remain concerned that unless the new methodology for assessing housing need takes into account constraints on meeting targets, the “exceptional circumstances” test will lead to more removal of the Green Belt

We also have considerable concerns over the 5-year cycle of local plans. We want to see the Green Belt have a vision and a strategy for its future and this would be nearly impossible if its boundaries were to be changed every five years.

There is a need for a long term strategy for the London Green Belt for it to provide further enhancements to the quality of life to those who wish to take advantage of its assets. There needs to be a specific assessment of the Green Belt in terms of stopping sprawl, preventing coalescence and countryside encroachment, and safeguarding the setting of historic towns.

Question 10 (b) – where land is removed from the Green Belt, local policies should require compensatory improvements to the environmental quality or accessibility of the remaining Green Belt land?

LGBC is opposed to this suggestion as it would be seen as an opportunity for LPAs to justify changing the boundaries of their Green Belt for the flimsiest of reasons. We already have experience of a LA which suggested a strip of land in between two motorways as replacement for a key section of Green Belt Land.

This question would ignore the original purpose of creating Green Belt near centres of population. It would lead to justification that as long as another piece of land, of whatever quality, were to be exchanged then the loss of an important environmental asset would be lost.

Would any of the environmental assets be considered in such a suggestion? How would land important to the retention of water to prevent flooding in central London be protected? Would biodiversity be a consideration? Would important food production be considered?

Removal of land from the Green Belt equates to a destruction of the Green Belt and will no longer be able to prevent urban sprawl.

Question 10 (c) - appropriate facilities for existing cemeteries should not be regarded as “inappropriate development” in the Green Belt?

No

We would wish to support the situation as it now stands under the NPPF which states that it would be acceptable providing the development does not result in a loss of openness or conflict with Green Belt purposes.

Question 10 (d) – development brought forward under a Neighbourhood Development Order should not be regarded as inappropriate in the Green Belt, provided it preserves openness and does not conflict with the purposes of the Green Belt?

No

We are not sure what this question adds to the discussion on the Green Belt. There are already appropriate policies setting out the situation. It is difficult to envisage the proposed land uses suggested, other than recreational uses such as playing fields or allotments.

Question 10 (e) – where a local or strategic plan has demonstrated the need for Green Belt boundaries to be amended, the detailed boundary may be determined in a neighbourhood plan (or plans) for the area in question?

The first question would be why the LPA has made the decision and what advantage is likely to be gained? The second would be how much land would be needed? The third

would be on geography and the fourth how the Green Belt can still maintain its purpose?

This suggestion could lead to unnecessary pressure on Neighbourhood planners from land owners and developers who may be prepared to use their financial advantage to intimidate the people concerned.

Far from encouraging local residents to become involved in local neighbourhood planning, the threat of legal action by an unscrupulous landowner or developer could be a serious deterrent.

Question 10 (f) - when carrying out review, LPAs should look first at using ant Green Belt land which has been previously developed and/or which surrounds transport hubs?

No

Brownfield land could be made available but only if it uses the same criteria about fulfilling the basic functions of Green Belt which includes openness. Otherwise aerodromes, golf courses and large gardens could be developed and if so would result in a pockmarked countryside with significant losses of the Green Belt.

Paragraph 79 of the NPPF states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” This proposal implies higher densities on previously developed land so openness may not be an option.

‘Hubs’ will need to be defined. There are many rural stations in the Green Belt, some in AONB, where high density development would be harmful. Although the hub may be suitable for the member of the family who works in London, the remaining members of the family group, because of the remoteness of some “hubs” in the Green Belt will be dependent on their car to get to school, the doctor and the shops. This is not sustainable and will do little to improve air quality.

If the terms “previously developed land” and “land near to commuter hubs” are not carefully defined then land-bankers and large developers will continuously submit applications in the Green Belt on the basis that they abide by the criteria, even though the site is 2 miles from the rail station or on a redundant solar panel site.

Question 11 – Are there particular options for accommodating development that national policy should expect authorities to have explored fully before Green Belt boundaries are amended, in addition to the ones set out above

Working with adjacent LPAs has not worked in the London Green Belt area. Most of the LPAs share similar pressures and many are unable to meet their own housing targets. The problem with individual LPAs carrying out their own Green Belt Review is that they are rarely co-ordinated with other Districts or the London Green Belt in general. There is

no overall strategy for the London Green Belt. The GLA has a co-ordinating role for its area and the London Green Belt needs a similar organisation.

Also each LPA has a wish to provide all the infrastructure and services from its own land bank and this could provide unnecessary duplication of, say schools, in close proximity to the neighbouring authority.

There needs to be an overall authority for the London Green Belt who could provide co-ordination and would have to be consulted and give approval for any development in the Green Belt.

Other options that should be considered are the effect on the environment, particularly as a resource to reduce flooding risk in London, the use of BMV land for horticulture to supply London with food and the effect the development will have on air quality and recreational activities.

Question 12 – Do you agree with the proposals to amend the NPPF to:

Question 12 (a) – indicate that local planning authorities should provide neighbourhood planning groups with a housing requirement figure, where this is sought?

We are concerned that this action would place a considerable burden on Neighbourhood groups who would then have to review their plans every 5 years. These groups are made up of volunteers who may not have the time or resource to carry out the work expected of them. This would be seen as an opportunity by landowners and developers to take advantage.

Question 12 (b) – make clear that local and neighbourhood plans (at the most appropriate level) and more detailed development documents (such as action area plans) are expected to set out clear design expectation; and that visual tools such as design codes can help provide a clear basis for making decisions on developmental proposals?

Yes

Having these aids will encourage interest, participation and acceptance of a suggested development.

Question 12 (c) – emphasise the importance of early preapplication discussion between applicants, authorities and the local community about design and the types of homes to be provided?

Yes

It must be appreciated that this will take time as those consulted should not be placed under pressure to make a quick decision.

Question 12 (d) – makes clear that design should not be used as a valid reason to object to development where it accords with clear design expectations set out in the statutory plans? And

Yes – assuming that there are not serious concerns about the design which come to light after the statutory plans have been approved.

Question 12 (e) – recognise the value of using a widely accepted design standard, such as Building for Life, in shaping and assessing basic design principles – and make clear that this should be reflected in plans and given weight in the planning process?

Yes

Question 13 – Do you agree with the proposals to amend national policy to make clear that plans and individual development proposals should:

Question 13 (a) – make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs?

We agree that, especially in London, high quality, high density housing is required in order to provide accommodation especially for those unable to afford either purchasing or renting a home at present.

There are already excellent examples of high-density accommodation in London which are attractive to those who live in them and contribute to an attractive scene.

Question 13 (b) – address the particular scope for higher density housing in urban locations that are well served by public transport, that provide opportunities to replace low-density uses in areas of high housing demand, or which offer scope to extend buildings upwards in urban areas?

Yes – we would be strongly in favour of this proposal

Question 13 (c) – ensure that in doing so the density and form of development reflect the character, accessibility and infrastructure capacity of an area, and the nature of the local housing need.

Yes

Question 13 (d) take a flexible approach to adopting and applying policy and guidance that could inhibit these objectives in particular circumstances, such as open space provision in area with good access to facilities nearby?

Yes – with some caution that flexibility could be seen by developers as a reason to build lower density homes of dubious quality.

Question 14 – In what types of location would indicative minimum density standards be helpful, and what should those standards be?

One of the purposes of the London Green Belt is to encourage regeneration in the centre of London. The area particularly important is in the three central boroughs of Lambeth, Tower Hamlets and Southwark.

This area is in urgent need of regeneration which could provide essential, central, high density housing especially for first-time buyers and those seeking affordable rented homes.

Question 15 – What are your views on the potential for delivering additional homes through more intensive use of existing public sector sites, or in urban locations more generally, and how this can be best supported through planning (using tools such as policy, local development orders and permitted development rights)?

See above on views on central London. There are considerable opportunities for high density, good quality development on brownfield sites in London and these should be used prior to any consideration of Green Belt incursions.

Question 16 – Do you agree that

Question 16 (a) – where local planning authorities wish to agree their housing land supply for a one-year period, national policy should require those authorities to maintain a 10% buffer on their 5 year housing land supply?;

No comment

Question 16 (b) - the Planning Inspectorate should consider and agree an authority's assessment of its housing supply for the purpose of this policy?

There has been some inconsistency in the way in which Inspectors have arrived at their decision on housing numbers. We would be concerned if this method of decision making were adopted without some clear guidelines.

Question 16 (c) - if so, should the Inspectorate's consideration focus on whether the approach pursued by the authority in establishing the land supply position is robust, or should the Inspectorate make an assessment of the supply figure?

We are unable to comment on this at present as there is no guidance yet available on how these figures will be calculated in future.

Question 17 - In taking forward the protection for neighbourhood plans as set out in the Written Ministerial Statement of 12 December 2016 into the revised NPPF, do you agree that it should include the following amendments:

Question 17 (a) a requirement for the neighbourhood plan to meet its share of local housing need?;

Not if the neighbourhood is within the Green Belt

Question 17 (b) - that it is subject to the local planning authority being able to demonstrate through the housing delivery test that, from 2020, delivery has been over 65% (25% in 2018; 45% in 2019) for the wider authority area?

No comment

Question 17 (c) - should it remain a requirement to have site allocations in the plan or should the protection apply as long as housing supply policies will meet their share of local housing need?

No comment

Question 18 - What are your views on the merits of introducing a fee for making a planning appeal? We would welcome views on:

- a) how the fee could be designed in such a way that it did not discourage developers, particularly smaller and medium sized firms, from bringing forward legitimate appeals;**
- b) the level of the fee and whether it could be refunded in certain circumstances, such as when an appeal is successful; and**
- c) whether there could be lower fees for less complex cases.**

We believe that there should be a disincentive for developers and land-bankers to continuously instigate planning applications on land which is designated, such as Green Belt.

We believe that a legal disincentive would be more successful as a payment would not be a problem to developers and land-bankers

Question 19 - Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?

No comment

Question 20 - Do you agree with the proposals to amend national policy so that:

- (a) - the status of endorsed recommendations of the National Infrastructure Commission is made clear?; and**
- (b) - authorities are expected to identify the additional development opportunities which strategic infrastructure improvements offer for making additional land available for housing?**

LGBC believes that there should be much greater consultation on any infrastructure which is likely to be built in the Green Belt. There should also be clear guidelines as to the protection given to designated areas so as to cause least harm.

Question 21 - Do you agree that:

(a) the planning application form should be amended to include a request for the estimated start date and build out rate for proposals for housing?

(b) that developers should be required to provide local authorities with basic information (in terms of actual and projected build out) on progress in delivering the permitted number of homes, after planning permission has been granted?

(c) the basic information (above) should be published as part of Authority Monitoring Reports?

(d) that large housebuilders should be required to provide aggregate information on build out rates?

LGBC would support any action which would force developers and land-bankers to build quickly and efficiently on land for which they have permission as this lack of completions is putting great pressure on designated areas such as Green Belt.

By delaying any development, the developer/land-banker is creating further pressure on LAs who do not have a 5-year supply of housing and using this to open up more greenfield sites.

We believe that the only way to solve this blockage is by having financial penalties common to the building profession for not completing on time, or the payment of council tax on all the unfinished homes by a given date.

Question 22 - Do you agree that the realistic prospect that housing will be built on a site should be taken into account in the determination of planning applications for housing on sites where there is evidence of non-implementation of earlier permissions for housing development?

Yes

Question 23 - We would welcome views on whether an applicant's track record of delivering previous, similar housing schemes should be taken into account by local authorities when determining planning applications for housing development.

It should be taken into account and if a poor record of completion is found then permission should be refused.

At the moment there is little land available to small builders as most suitable land is likely to be in an option agreement with a large developer/land-banker. These options should be transparent and should be studied to assess the harm they are doing to the housing market

Question 24

If this proposal were taken forward, do you agree that the track record of an applicant should only be taken into account when considering proposals for large scale sites, so as not to deter new entrants to the market?

No. We believe this would be open to abuse by large developers/land bankers

Question 25 - What are your views on whether local authorities should be encouraged to shorten the timescales for developers to implement a permission for housing development from three years to two years, except where a shorter timescale could hinder the viability or deliverability of a scheme? We would particularly welcome views on what such a change would mean for SME developers.

We support the proposal in principle.

For the SME, the evidence is that they build quickly as they do not have the resource to delay. Therefore, any such initiative ought to be welcomed by the SME builder.

Question 26 - Do you agree with the proposals to amend legislation to simplify and speed up the process of serving a completion notice by removing the requirement for the Secretary of State to confirm a completion notice before it can take effect?

Yes

Question 27 - What are your views on whether we should allow local authorities to serve a completion notice on a site before the commencement deadline has elapsed, but only where works have begun? What impact do you think this will have on lenders' willingness to lend to developers?

We support in principle but there needs to be a speedy resolution which should include a quicker CPO. Lenders already finance developers who take on large infrastructure projects with a clearly defined completion date, such as the Olympics, so they are aware of the risks and rewards.

Question 28 - Do you agree that for the purposes of introducing a housing delivery test, national guidance should make clear that:

- a) The baseline for assessing housing delivery should be a local planning authority's annual housing requirement where this is set out in an up-to-date plan?**
- b) The baseline where no local plan is in place should be the published household projections until 2018/19, with the new standard methodology for assessing housing requirements providing the baseline thereafter?**
- c) Net annual housing additions should be used to measure housing delivery?**
- d) Delivery will be assessed over a rolling three year period, starting with 2014/15 – 2016/17?**

We would need to see the way in which housing figures are to be calculated in future before commenting on this question.

Question 29 - Do you agree that the consequences for under-delivery should be:

- a) From November 2017, an expectation that local planning authorities prepare an action plan where delivery falls below 95% of the authority's annual housing requirement?;**
- b) From November 2017, a 20% buffer on top of the requirement to maintain a five year housing land supply where delivery falls below 85%?;**
- c) From November 2018, application of the presumption in favour of sustainable development where delivery falls below 25%?;**
- d) From November 2019, application of the presumption in favour of sustainable development where delivery falls below 45%?; and**
- e) From November 2020, application of the presumption in favour of sustainable development where delivery falls below 65%?**

We do not have any comment on this question other than to ensure that such actions will not increase any greater threat to the Green Belt.

Question 30 - What support would be most helpful to local planning authorities in increasing housing delivery in their areas?

No comment

Question 31 - Do you agree with our proposals to:

- a) amend national policy to revise the definition of affordable housing as set out in Box 4?;**
- b) introduce an income cap for starter homes?;**
- c) incorporate a definition of affordable private rent housing?;**
- d) allow for a transitional period that aligns with other proposals in the White Paper (April 2018)?**

The definition of affordable housing is unclear and is interpreted by developers in a way which suits their objective. There is a clear need for more affordable housing and a new definition would be helpful as a guide to LPAs and the Inspectorate

Question 32 - Do you agree that:

- a) national planning policy should expect local planning authorities to seek a minimum of 10% of all homes on individual sites for affordable home ownership products?**
- b) that this policy should only apply to developments of over 10 units or 0.5ha?**

Yes

Question 33 - Should any particular types of residential development be excluded from this policy

No comment

Question 34 - Do you agree with the proposals to amend national policy to make clear that the reference to the three dimensions of sustainable development, together with the core planning principles and policies at paragraphs 18-219 of the National Planning Policy Framework, together constitute the Government's view of what sustainable development means for the planning system in England?

The definition of sustainable development is not clear and causes speculation at planning meetings and at inquiries. A clearer definition is required.

Question 35 - Do you agree with the proposals to amend national policy to:
a) Amend the list of climate change factors to be considered during plan-making, to include reference to rising temperatures?

b) Make clear that local planning policies should support measures for the future resilience of communities and infrastructure to climate change?

Yes LGBC agrees with this proposal especially as this ought to highlight the importance of the London Green Belt to reducing flood risk in the capital.

Question 36 - Do you agree with these proposals to clarify flood risk policy in the National Planning Policy Framework?

Yes, especially with regard the risk to London and the important role the Green Belt has in reducing this risk.

Question 37 - Do you agree with the proposal to amend national policy to emphasise that planning policies and decisions should take account of existing businesses when locating new development nearby and, where necessary, to mitigate the impact of noise and other potential nuisances arising from existing development?

Yes

Question 38 - Do you agree that in incorporating the Written Ministerial Statement on wind energy development into paragraph 98 of the National Planning Policy Framework, no transition period should be included?

Yes

Question 39 - Should the thresholds set out in Part 6, Class A of the Town and Country (General Permitted Development) Order 2015 (as amended) be amended, and if so:

- **What would be appropriate thresholds including size and height;**
- **What prior approvals or further conditions would be required; and,**
- **Are there other changes in relation to the thresholds that should be considered?**

No, we believe that permitted rights are weakening the Green Belt policy and any increase would cause further damage. All applications for development in the Green Belt should be considered as a full planning application

Question 40 - Do you consider that this proposal would be effective in creating more homes for rural workers, and if so:

- **How should the right be framed to best ensure homes are available to meet local need; and,**
- **Should the new right have similar conditions to the existing Class Q right?**

No comment