The London Green Belt Council

Response to the Ministry of Housing, Communities and Local Government paper:

Changes to the current planning system

Consultation on changes to planning policy and regulations – August 2020

From

The London Green Belt Council

September 2020

1. **Introduction**

   1.1. The London Green Belt Council is a group of over 100 organisations dedicated to protecting and enhancing London's Green Belt

   1.2. London's Metropolitan Green Belt (LMGB) and other rural areas close to towns and cities has never been more important. The pandemic has demonstrated its importance for the physical and mental health of local residents and visitors. In a recent survey 68% of the people surveyed stated how important the countryside was and should be protected and enhanced.

   1.3. It provides:
   - An opportunity for quiet relaxation in an area of proximity which is a contrast to the urban area and especially an opportunity to recuperate during the coronavirus pandemic.
   - A calming and relaxing area for those suffering from mental stress and illness.
   - Protection from flooding to London and the surrounding area
   - An important agricultural asset, supplying local food with low carbon transport. This could become an important asset at the end of this year.
   - Footpaths and cycle tracks
   - Respite from the heat and pollution of the urban area
   - Carbon sequestration in the trees, plants and earth in the countryside
   - Biodiversity close to the urban area.

   1.4. All these benefits are supporting the need to preserve and protect London's Green Belt, but in order to ensure that there is long term security, there is an important need for a comprehensive long-term strategy. This strategy would need to include the whole of London's Green Belt including that in the Greater London Authority. It should also reflect the Government's 25-year Environment Plan.

2. The likely threat to London's Green Belt of the algorithm (Para 30)

   2.1. There is a stated aim, in this consultation paper, to build without affecting protected areas such as Green Belts (GB), AONBs, SSSIs, National Parks and Conservation areas and this is to be welcomed. However, we do not see how the numbers quoted in the algorithm will do other than put considerable pressure on many London Green Belt Local Planning Authorities.

   2.2. As an example, in Sevenoaks where the land area is 93% protected and where there is a need, under the algorithm calculation for an increase from 231 homes per year, using the current standard method using the 2014 ONS figures, to a requirement of 820 as calculated by the algorithm. Sevenoaks has already sacrificed large areas of Green Belt in order to meet its current commitment, so from where will the extra requirement be satisfied other than from London's GB?

   2.3. Unless there is an alteration to the algorithm very large areas of GB, some of the most attractive in the LMGB area, will be sacrificed, which would undermine statements made

by the Government endorsed by the Prime Minister.

2.4. If a factor in the calculation included the area of GB that was within the boundary of the LPA then with 93% of GB in Sevenoaks the resulting number of new homes would be very much smaller and it would take no account of brownfield land.

2.5. A further fault in the algorithm is that it does not appear to "level up" England. Results show increasingly high numbers in the south-east, east and south west of England and much lower growth in the midlands and the north of England. This does not support the Government's intention of "levelling up" and is a default in the algorithm by the weight of the affordability factor. By placing an increase in housing numbers on the south east, in particular, will considerably increase the threat to London's Green Belt.

2.6. We think, from our experience, that the way in which housing numbers are calculated should be transparent and understandable by the public. This present algorithm is neither and will only increase the distrust people have for planning and figures that are quoted.

3. Affordability

3.1. Like many LMGB LPAs Sevenoaks suffers from very high house prices which are caused by those working in London and earning high levels of income, living within its boundaries. There is, apparently, little research as to how many of the residents work locally but it could be safe to assume that their income would not compare with that of a City worker. The affordability factor is therefore not reliable in such a situation and provides an incorrect assumption. There are many other LMGB LPAs in those counties surrounding London in a similar position.

3.2. Developments, that have taken place, are taking place and are planned to take place in London's GB are high value, low density houses. From our recent research we have learned that there are more than 250,000 houses being placed in London's Green Belt and little or no evidence that any of them are affordable. Our research shows that, having obtained planning permission for a G B site, developers build normally, four or five bedroomed detached executive houses because, being built on GB land they produce much more profit for developers.

3.3. The most satisfactory way to achieve affordable housing in villages in the GB is through rural affordable housing in order to attract young people. Developers are not keen to become involved due to the limited profitability of such schemes. Allowing developers to build a "few mansions in the GB" in order to fund affordable homes is a retrograde step and should be unnecessary giving the right incentives to land owners. Our answer to Question 22 in the paper is that we support the present threshold but believe it should be part of a Neighbourhood Plan in order to include the wishes of those who live in the area.

3.4. We are concerned as to how the money raised in the Infrastructure Levy will be focussed to support affordable housing. At present there appears to be little transparency over how CIL and Section 106 money awarded to local authorities is spent. In order to ensure

affordable housing is supported we would urge the Government to ring fence the money for affordable housing.

4. Deliverability

4.1. The lack of delivery for developments which have planning permission is putting even greater pressure on London's Green Belt. According to the Local Government Association, there is planning permission for over one million homes which are yet to be built. This has risen from 500,000 in 2016. It is becoming a concern that this figure is rising fast and contributing to even greater pressure to sacrifice further loss of London's Green Belt.

4.2. Because developers are not building out, and land-banking has forced LPAs to find additional land suitable for housing. LPAs have limited powers to ensure that land with planning permission is developed in a timely way. Developers should understand that any delay in development will be penalised, so as to encourage speedy development.

4.3. The algorithm appears to take no account of this obvious land banking and could be said to be encouraging it. Due to what could be said to be deliberate delay in permissioned land It is causing more land to be sacrificed. Developers could feel it is their interest to deliberately delay in order to secure further prime greenfield land and then cherry pick the most profitable site. With this necessity of providing more land it would inevitably lead to further loss of GB.

5. Brownfield Land

5.1 We welcome the Government's ambition to build on brown field land in order to protect the countryside but are concerned that there is no strategy to examine the amount and availability of such land. There is also little incentive to encourage developers to take the opportunity of focussing on brownfield. From our research, in an investigation into the amount of brownfield land carried out in the London Borough of Enfield, it is apparent that there are considerably more sites available for development. It also appears that development on brownfield sites is more likely to be affordable and that infrastructure more likely to be already in place.

5.2. LPAs are expected to keep up to date brownfield registers but few appear to do so. There is also a lack of evidence that LPAs are carrying out any work to identify potential brownfield. Perhaps understandably that this is because it is not a Government requirement to do so. LPAs planning departments are already stretched and under resourced and a proper investigation into the availability of brownfield is not considered a priority.

5.3. From our experience, many LPAs have gone to considerable expense and spent large sums of money on Green Belt reviews. This is not a requirement under the NPPF and yet the majority of London Green Belt LPAs have completed such an exercise.

5.4. However, we know of no LPA that has spent money on a similar brownfield review. This is mainly due to inspectors insisting on Green Belt reviews, apparently contrary to Government policy.

5.5. Developers, especially the larger ones, are not keen to take on brownfield sites. They often have to be decontaminated and there is less profitability than building on green field sites. We welcome the investment that the Government intends to encourage brown field development, especially as it will protect countryside and is more likely to provide affordable homes. The incentive needs to be such that developers will react positively. If not completed already, research into possible solutions should be carried out into what will be needed to encourage the right solution. Tax breaks might assist.

5.6. We urge the Government to insist on a proper investigation and analysis of all brownfield sites within their boundaries together with realistic completion dates before allowing any further loss of Green Belt. No local plan should be considered sound unless and until such a comprehensive investigation has taken place.

6. Conclusion

6.1. Algorithm – We do not believe that this algorithm is correct, nor that it will have the confidence not only for those who are to use it but for the general public. It is not transparent and is unlikely to be understood.

6.2. Affordability – There is a desperate need for affordable housing, especially for young families and young people. The suggested solution in this paper is unlikely to alleviate the situation.

6.3. Deliverability – There is an urgent need to ensure that once planning permission is granted, development takes place as soon as possible. Unfortunately, there is nothing in this paper which will speed up delivery but on the contrary, there is a danger it will encourage further land-banking.

6.4. Brownfield land – There is both in declared Government policy and in this paper declaration that brownfield must play its part in future house building targets. However, there is no clear strategy as to how the amount of brownfield land there is and encouragement to build on it. A clear guidance needs to be given to LPAs to carry out a comprehensive brownfield review.