

Further Serious Loss of London's Green Belt

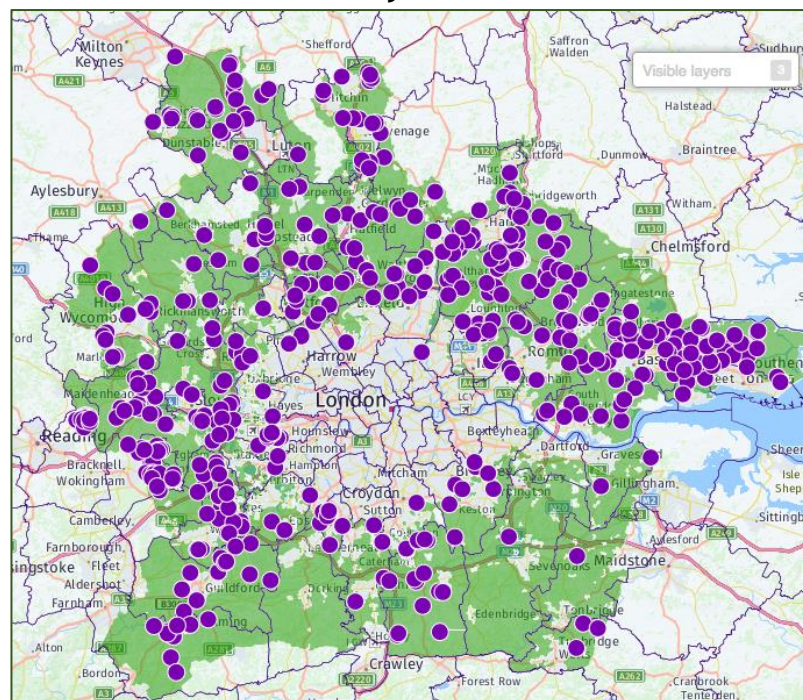
'Safe Under Us?' - Two Years On January 2019

Threats to the London Metropolitan Green Belt:

July 2016



July 2018



Foreword

This is the third report from the London Green Belt Council which provides evidence that, once again, more London Green Belt is being sacrificed for development. Our report shows that in the year to July 2018 the increase of the number of dwellings sites proposed is 43,411 (27%) over the previous year. In 2017, the London Green Belt Council predicted the increase and we predict that there will be a further increase in 2019, despite reassurance from government that the Green Belt is to be protected.

Government at all levels, supported by the building industry, claims that development in the Green Belt will provide more affordable housing, especially for young people as first-time buyers but as this report shows this is far from the truth. It is likely that as far as development in the London Green Belt is concerned the percentage of genuinely affordable housing is less than 10% and some of the developments are not sustainable.

In the 2017 the London Green Belt Council asked who was to blame for the continuing and growing loss of London Green Belt. From further research it transpires that Local Planning Authorities complain that they are given no option but to include Green Belt in their plans due to pressure of central government wielded by the Inspectorate. This, in spite of there being considerable brownfield land available.

The findings of soundness of Local Plans by inspectors appears to be somewhat of a post-code lottery. Some inspectors are at pains to protect London Green Belt while others not only pressure Local Authorities to include Green Belt but on occasions force neighbouring authorities to accept extra housing figures, aware that this can only be achieved by losing further Green Belt.

Despite some further clarity on the protection of Green Belt included in the latest National Planning Policy Framework (NPPF) - July 2018 which is welcomed, there is still reference to “special circumstances” and some Local Authorities are claiming that a lack of a five-year supply of housing is “special circumstances”.

There appears to be no lessening of pressure on the London Green Belt for housing and this in spite of its importance for farming, recreation, climate change, flooding and a major role in health and welfare especially for those suffering from mental health symptoms, as described in the government’s report - “A Green Future”

The London Green Belt Council calls on government at all levels to protect the London Green Belt, a positive and important resource for those living in or around London not only now but in the future.

Richard Knox-Johnston

Chair

The London Green Belt Council

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1. Summary and Key Findings

This report is the second update to research undertaken in September 2016 entitled ‘**Safe Under Us?** - An investigation into widespread threats from housebuilding in the London Metropolitan Green Belt’. It is issued alongside an updated Map of Threats to London’s Green Belt, originally published in 2016, which identifies the locations and gives details of the sites under threat.

The first update to ‘Safe Under Us?’ was published in September 2017. This showed that the pressure on the London Metropolitan Green Belt (LMGB) had grown at a rapid rate and that the threat had significantly increased since the original 2016 survey. This increase had been predicted in the 2016 report, despite HM Government statements that this prediction was “misleading”.

This second update shows that the pressure on the LMGB has grown at an even greater rate than in the September 2017 report, significantly increasing the threat identified in the original 2016 survey.

- The number of Green Belt sites we identified as being under threat from development increased again, from 203 in July 2016 to 403 in July 2017 and to 519 in July 2018.
- The number of dwellings proposed on LMGB land increased from 123,500 in July 2016 to 159,300 in July 2017 and increased to 202,700 in July 2018.
- The majority of threats were identified in Borough and District Local Plans, showing that there are clear plans to release these sites for housing.
- As in 2016 and 2017, the counties with the greatest number of threats are Hertfordshire (70,787 houses), Essex (67,826) and Surrey (29,381).
- The three Local Planning Authorities (LPAs) with the greatest number of threats are Thurrock (29,635), Dacorum (14,360) and East Hertfordshire (13,450).
- The evidence suggests that the number of threats will increase further as more Local Plans are progressed, for example in Kent where progress with Local Plans is generally at a very early stage.

The findings of this report reinforce the conclusions in ‘Safe Under Us?’ about how theoretically protected LMGB land is coming under threat as a result of Government housing and planning policies. These policies undermine Green Belt protections, allowing the Government to shift responsibility onto local authorities, giving financial incentives to those who meet inflated targets and penalties to those who do not.

The 2018 research underlines how:

- The Local Plan process continues to undermine Green Belt protection. Overall the threats contained within Local Plans have become more numerous and widespread as plans progress.
- The combined pressures of the Duty to Co-operate (an obligation to consult with a neighbouring authority), inflated housing targets and the definition of ‘exceptional circumstances’ in the revised National Planning Policy Framework (NPPF) of July 2018 prevent LPAs from citing the Green Belt as a constraint on housing growth and drive

them to release Green Belt land for development with insignificant impact on meeting the need for genuinely affordable housing.

This report provides further evidence that action is needed to reverse the increasing erosion of the LMGB. It demonstrates that LMGB land released for housing does nothing to address the affordability crisis in the south east of England and sacrifices valued open space that provides a range of natural capital benefits vital to the health and wellbeing of its residents.

The recommendations in our previous reports on the erosion of the LMGB continue to be apposite and are increasingly relevant in view of the evidence in this current report:

1. A Strategic London Green Belt Authority should be established to take an overall view of the integrity of the LMGB, to protect the LMGB and to promote and facilitate its positive use and restoration. The Authority should also monitor the condition of the Green belt and take action where the quality of the land has deteriorated.
2. National and local government should follow through on the exceptional circumstances test in the revised National Planning Policy Framework, so that changes to Green Belt boundaries are truly exceptional. LPAs should clearly demonstrate that they are making the best use of suitable brownfield sites and under-utilised land first in line with this policy.
3. The Government should clarify in planning practice guidance that Green Belt boundaries should not be reviewed every time council plans are supposed to be reviewed, ensuring that the boundaries endure for at least the timeframe of a local plan
4. More widely, a brownfield first approach should be established in national planning policy that supports the rebalancing of the economy, assists in urban regeneration and ensures suitable brownfield sites and under-utilised land is used first.
5. The Government should develop clear guidance to enable LPAs to revisit and where necessary recalibrate housing targets to ensure they are supportable, realistic, and take account of the Green Belt. The duty to cooperate and statement of common ground should recognise that in some areas, housing need may not be met where Green Belt is shared across several LPAs.

To acknowledge that major developments in the Green Belt are not providing and will not be able to provide genuinely affordable housing.

2. Methodology

The methodology used for the research is exactly the same as in 2016 and 2017, thus providing a comparable time series.

2.1 The Research

CPRE branches covering LPAs with land in the LMGB were contacted in early July 2018. Branches were asked to provide data for the relevant LPAs in their area on sites within the LMGB that are proposed for development within adopted or emerging Local Plans and sites which are the subject of planning applications.

The CPRE branches involved were Bedfordshire, Berkshire, Buckinghamshire, Essex, Hertfordshire, Kent, London and Surrey. The branches were asked to supply data (where known) on the proposed use of each of the sites (residential, employment, other), the number of dwellings proposed for each site, the hectareage of the site, latitude and longitude coordinates and the stage of Local Plan development.

The main data sources used were the emerging Local Plans at any stage of development:

- Regulation 18 consultation (Issues and Options stage)
- Call for Sites
- Preferred Options consultation
- Regulation 19 consultation (Pre-submission stage)
- Submission draft
- Main Modifications
- Adopted Local Plan

A site within the LMGB that is proposed in any of the above stages of Plan development is, by definition, being considered for development and in which case constitutes a threat to the LMGB. Sites considered for development in draft Local Plans will not necessarily be allocated in adopted Local Plans. In particular, at the Regulation 18 (Issues and Options) stage of Local Plan preparation, it is likely that more sites are proposed than will be eventually allocated.

In addition to sites proposed or allocated in Local Plans, a small number of planning applications were also included where these were known about in the local CPRE branch. However, the majority of sites are those proposed or allocated in Local Plans.

Data collection was complete by 31 July 2018.

In 2018, all 66 of the LPAs with land in the LMGB were surveyed, compared with 85% in 2017 and 65% in 2016. This increase in survey coverage was responsible for only a minor increase in the overall figures for the number of threats to the LMGB when compared to the increase from the total number of threats identified in all Local Plans. The research identified 5357 dwellings threatened on LMGB land in LPAs not previously surveyed, while the total number of threats across all LPAs increased by 43,411 dwellings.

2.2 Mapping

The data provided by CPRE branches was used to produce an interactive map showing the location of the threat and any information provided on the nature of that threat. In particular the number of dwellings proposed for development (if residential), the size of the site and the most recent stage of Local Plan progress. Geographical Information System (GIS) software was used to produce the map.

2.3 Analysis

The data on sites and number of dwellings proposed for development within the LMGB was aggregated by LPA and by county. These were compared with the same data for 2016 and 2017 and used to assess emerging trends.

It should be noted that data was not always available within Local Plans on the number of residential units proposed for a site in every instance, and therefore the number of dwellings proposed in the LMGB are underestimates.

In addition to the data collected by CPRE branches, we have made use of several other data sources to supplement our data to provide additional analysis and enhance the interpretation of the data. These additional sources were:

- 55 out of the 66 of local authorities with London Green Belt in their boundaries plan to build on the Green Belt
- Live tables on land use change statistics, Ministry of Housing, Communities and Local Government, May 2018¹;
- Local Authority green belt statistics for England: 2017 to 2018, Ministry of Housing Communities and Local Government, October 2018²;
- House price to workplace-based earnings ratio, Office for National Statistics, April 2018³;
- Data compiled by CPRE National Office on available brownfield land by LPA for the latest annual report on 'The State of the Green Belt' published August 2018⁴;
- Subnational Population Projections for England: 2016-based, ONS, May 2018⁵.

¹ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-land-use-change-statistics>

² <https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2017-to-2018>

³

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

⁴ <https://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4931-state-of-the-green-belt-2018>

⁵ <https://www.ons.gov.uk/releases/subnationalpopulationprojectionsforengland2016basedprojections>

3. Results

3.1 Updated Map of Sites Under Threat

This report is published alongside an updated map of threats which can be viewed at <http://www.londongreenbeltcouncil.org.uk/>. Each dot on the map gives the location and leads to more details on the proposals for the site.

Figures 3 (a) to 3 (c) show the increasing number of sites threatened with development in the London Metropolitan Green belt over the years 2016, 2017 and 2018.

Figure 3 (a) Map of threats to the LMGB July 2016 showing 203 threatened sites

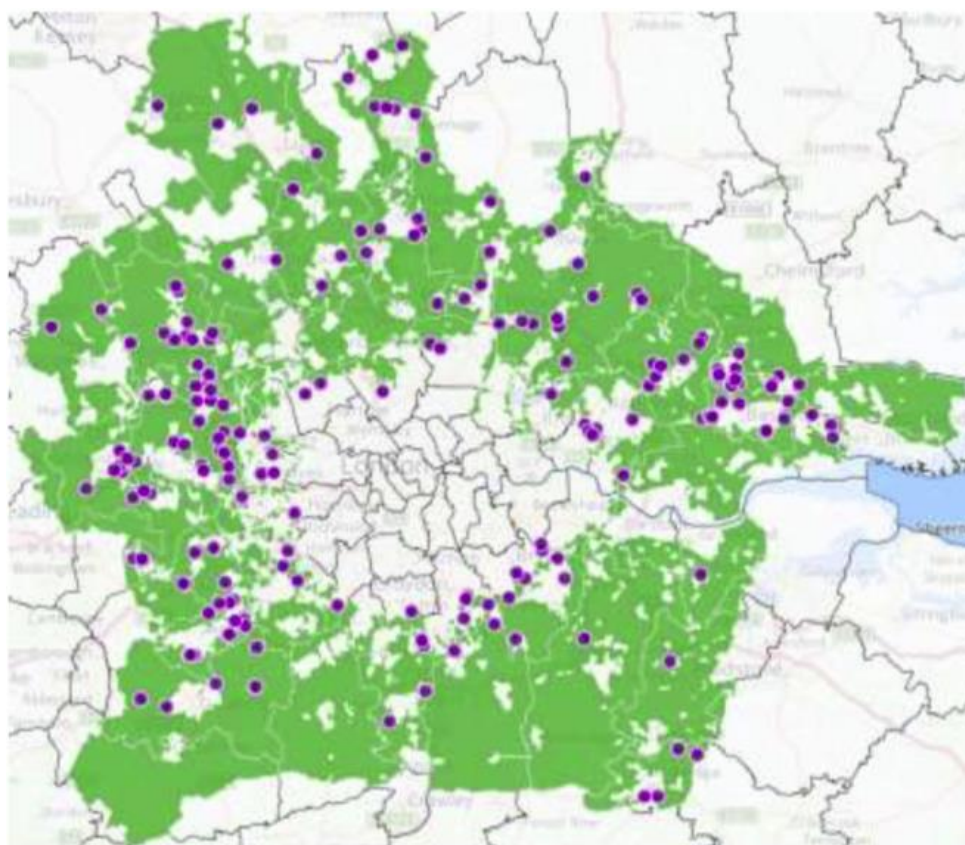


Figure 3 (b) Map of threats to the LMGB July 2017 showing 443 threatened sites

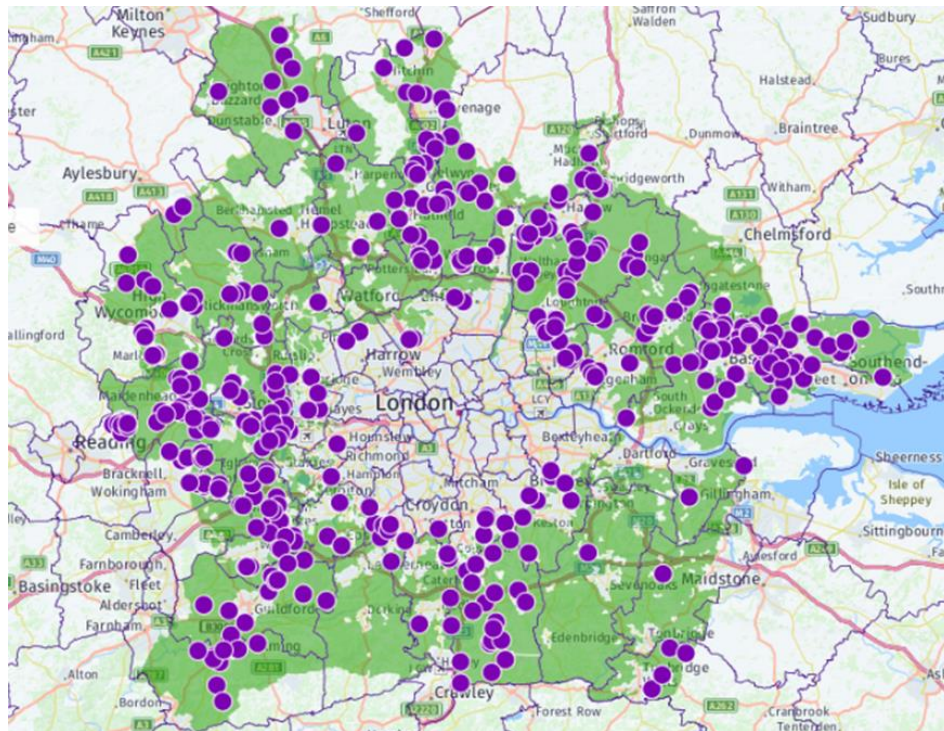
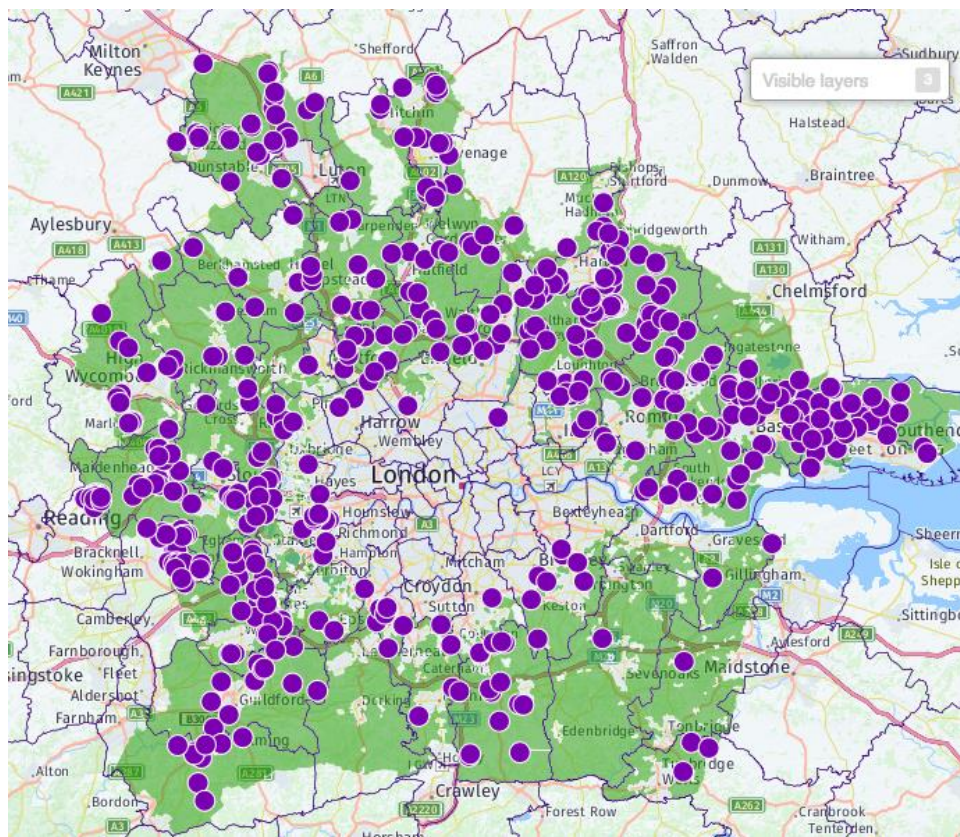


Figure 3 (c) Map of threats to the LMGB July 2018 showing 519 threatened sites



The map shows that proposals to develop on LMGB land are widespread and extensive. No strategic overview or assessment is being taken of the cumulative impact of all these threats.

3.2 Increases in Threats - Key Facts

The number of dwellings under threat has increased by two-thirds since our first survey and the number of sites has more than doubled.

The total number of dwellings proposed on LMGB land has increased again from 2017 to 2018, to 202,715. This is a bigger annual increase than between 2016 and 2017, demonstrating that the threats to the LMGB are accelerating. The number of sites identified for development also increased. Table 3 (d) presents the figures obtained from the research in each of the three years in which data has been gathered. The results are shown graphically in figures 3 (e) and 3 (f).

Table 3 (d) Number of dwellings and sites proposed for development in the LMGB, 2016 to 2018

	Number of dwellings	Increase from previous year	Number of sites	Increase from previous year
July 2016	123,528	Not known	203	Not known
July 2017	159,304	35,776 (29%)	443	240 (118%)
July 2018	202,715	43,411 (27%)	519	76 (17%)

Figure 3 (e) Total number of dwellings proposed in the LMGB, 2016-2018

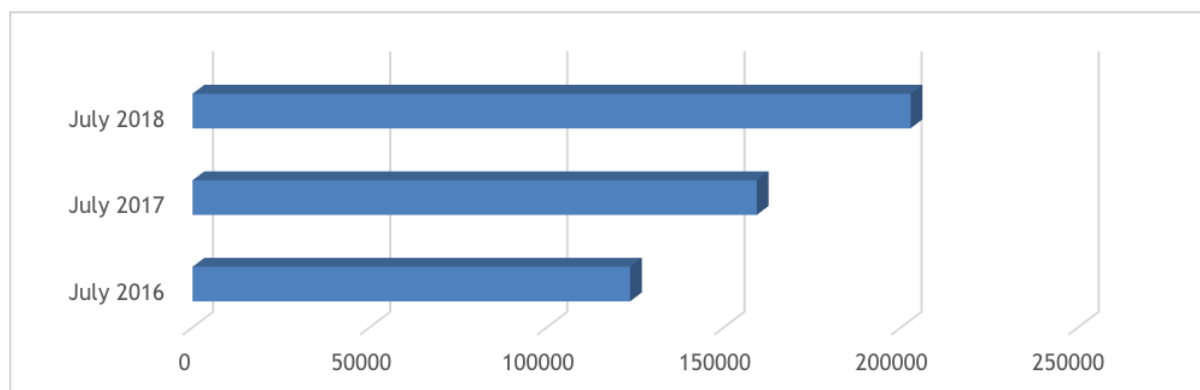
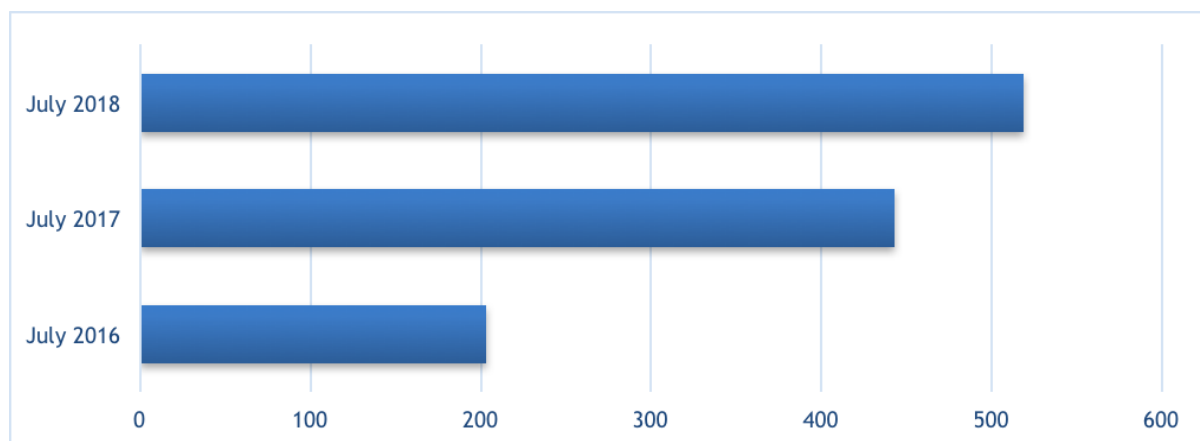


Figure 3 (f) Total number of sites proposed for development in the LMGB, 2016-2018

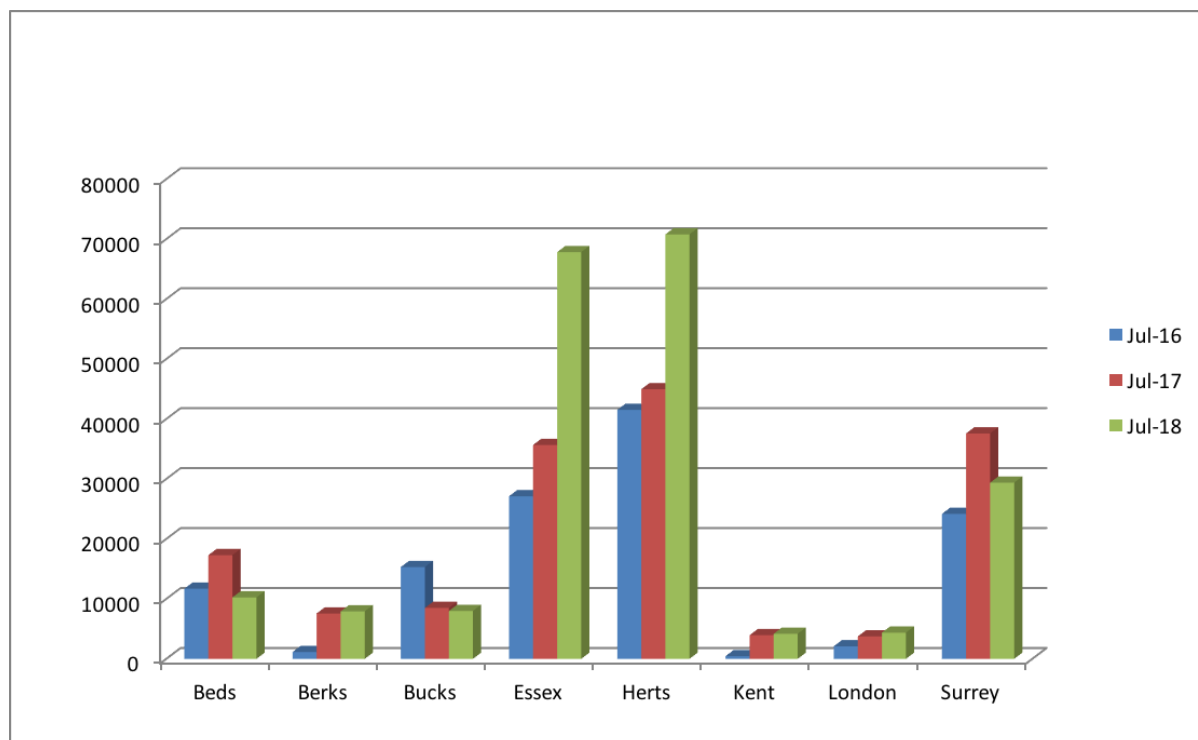


The majority of the threats were identified in borough and district Local Plans showing that there are firm plans to release these sites for housing.

3.3 Threats by County

As in 2016 and 2017, the counties with the greatest number of threats are Hertfordshire (70,787 houses), Essex (67,826) and Surrey (29,381), shown in figure 3 (g)

Figure 3 (g) Number of threats from housing proposals in the LMGB by county, 2016-2018



The likely reason for the low number in Kent is that most LPAs in Kent are at an early stage of Plan preparation. Most are at Regulation 18 consultation stage (Issues and Options) or earlier, the exception being Maidstone where the Local Plan was adopted in October 2017. It is expected that the number of threats in Kent will rise as Local Plans are progressed.

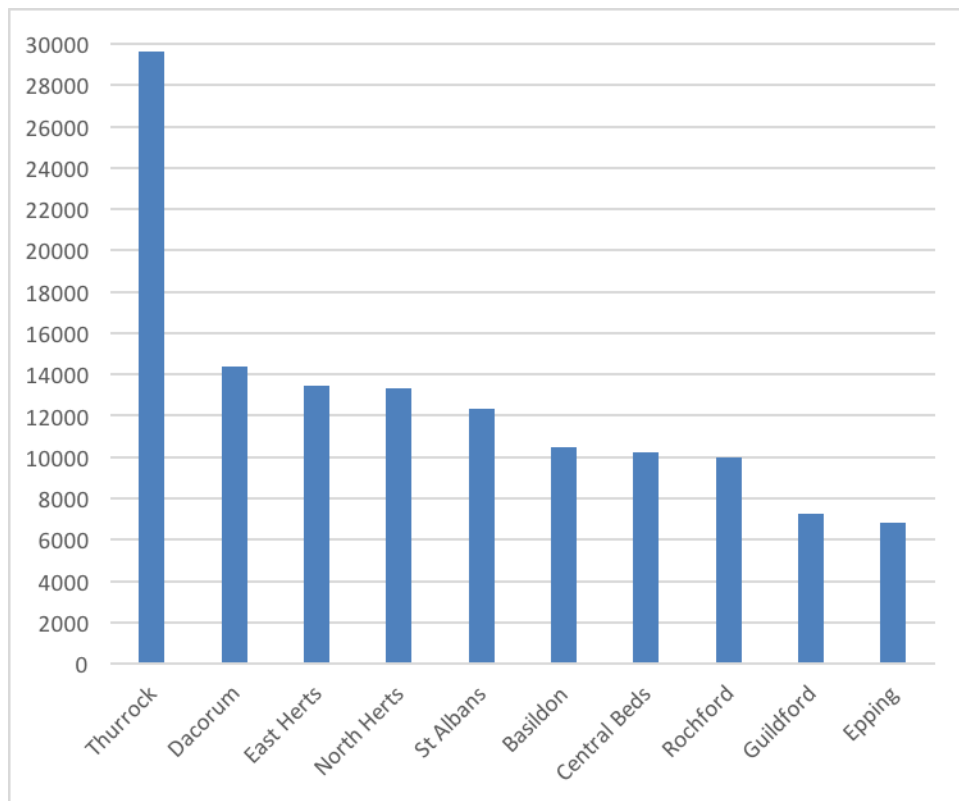
The fall in the number of threats in Surrey is due to a decrease in housing proposals in the Green Belt from 2017 to 2018 for 6 of the 11 local authorities, most notably in Spelthorne (from 3000 to nil) and Tandridge (from 8793 to 5093). The same reason explains the drop in Bedfordshire, where Central Bedfordshire reduced the number of housing proposals in the LMGB from 17,300 in 2017 to 10,251 in 2018.

3.4 Threats by Local Planning Authority

The threats are much larger in some LPAs than others

The threats to the LMGB are widespread, but in some areas there is a particular concentration of threats. Figure 3 (h) shows the 10 LPA's with the largest number of threats from proposed dwellings.

Figure 3 (h) LPA's in the LMGB with the largest number of threats, 2018



It is notable that these mostly (with the exception of Guildford) fall into two geographical groupings, one to the north of London (Dacorum, East Herts, North Herts, St Albans, Central Beds and Epping) and one to the East (Thurrock, Basildon and Rochford). Clearly the LMGB is under considerable pressure in these two areas. As each Local Plan is inspected singly, albeit within a context of the Duty to Cooperate, there is no strategic overview being taken of the cumulative impacts of the erosion of the LMGB when multiple LPA's in a geographical area take Green Belt land to accommodate the perceived housing need.

The three LPA's with the greatest number of threats are Thurrock (29,635 dwellings), Dacorum (14,360 dwellings) and East Hertfordshire (13,450 dwellings). Thurrock has a notably larger number of threats than any other LPA. Thurrock Council undertook a Regulation 18 consultation in July-September 2017 and is due undertake a second consultation in late 2018 on options for growth. This included two options that would result in development in the green belt. It is possible that neither option is chosen as the preferred option for Thurrock, but it is certainly possible that one of them is.

The overall percentage increase in the numbers of sites and housing units threatening the LMGB since our research began is certainly large, but nine of the 66 LPA's have experienced particularly large increases in the number of threats to their Green Belt (Windsor and Maidenhead, Wycombe, Castle Point, Rochford, Dacorum, St Albans, Elmbridge, Runnymede and Woking). The largest increases have been in Dacorum and

Castle Point, who have seen 1496% and 1597% increases in threats from the proposed number of dwellings respectively.

3.5 Policy Implications

Green Belt development can no longer be considered exceptional

Of the 66 LPAs with LMGB land, only 11 are proposing not to allocate any land for development in their Green Belt (Luton, Harlow, Southend, Watford, Maidstone, Bexley, Ealing, Kingston, Newham, Waltham Forest and Spelthorne). These local authorities represent only 17% of all LPAs with LMGB land.

This is a clear indication that the Government's Green Belt policy to protect Green Belt land and *prevent urban sprawl by keeping land permanently open* is not working. The Green Belt is being eroded by land being taken, through the local plan process, in order to meet so-called objectively assessed need for housing.

The new National Planning Policy Framework⁶ states that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the LPA must be able to show that it has examined fully all other reasonable options for meeting its identified need for development. These include making the best use of brownfield sites and under-utilised land, optimising the density of development and discussing meeting some of their neighbouring authorities' unmet need.

Exceptional circumstances will surely be said to exist in almost every LPA within the LMGB, given the Government's ambitious housing targets of 300,000 per annum. It is a widespread challenge to find enough land to accommodate unrealistic housing targets. The Duty to Co-operate with neighbouring authorities, all of whom are struggling with the same problem, is a poor substitute for strategic planning as the pressure to release Green Belt land for development mounts.

Green Belt development has not solved the housing affordability problem in the South East of England

Statistics released by the Government⁷ provide national data on the density of housing developments on Green Belt land and on other land. These statistics show that residential developments on Green Belt land are typically built at wastefully low housing densities. Nationally, the average density of developments built outside the Green Belt is 32 dwellings per hectare, while developments on Green Belt land have an average density of 21 dwellings per hectare. This is a clear demonstration that Green Belt residential developments typically do not seek to provide high density housing and do not represent an efficient use of land.

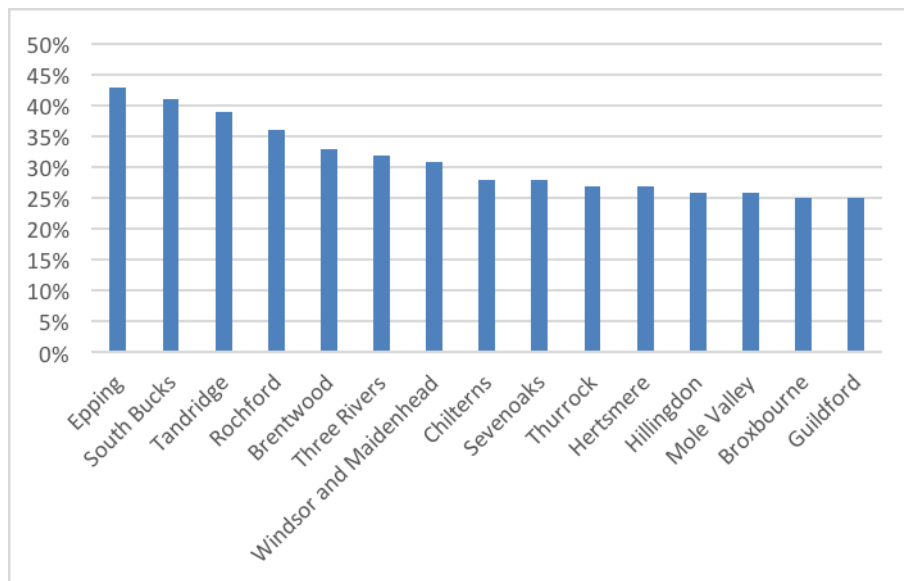
Whilst well-located and small scale rural exception sites in the Green Belt can provide homes that are affordable to local people, Government data gives clear evidence that large scale building on Green Belt land is not providing affordable housing. Figure 3.8 shows LPAs with LMGB land that have a high percentage of new housing built on the LMGB.

⁶ National Planning Policy Framework, Ministry of Housing, Communities and Local Government, July 2018

⁷ Live tables on land use change statistics, Ministry of Housing, Communities and Local Government, May 2018

These LPAs have permitted 25% or more of new housing to be built on the Green Belt between 2013 and 2017. This is nearly a quarter (23%) of all LPAs with LMGB land.

Figure 3 (i) Proportion of new residential addresses in the LMGB from 2013 to 2017



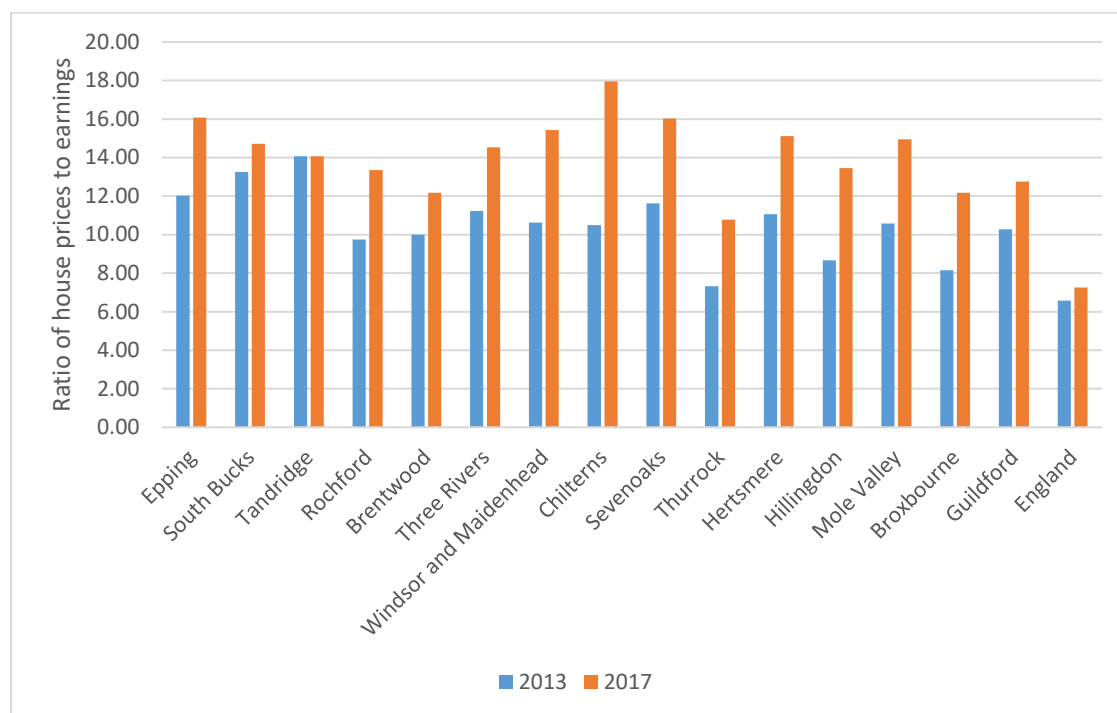
Source: Live tables on land use change statistics, MHCLG, May 2018

The Office for National Statistics produces data on the affordability of housing⁸. Figure 3 (j) shows the change in affordability⁹ from 2013 to 2017 for the 15 LPAs that permitted a high proportion of new housing on Green Belt land over the same period [figure 3 (i)] and includes data for England as a whole for comparison. The higher the ratio of house prices to earnings, the less affordable the housing is. Clearly, in almost all of these LPAs sacrificing significant amounts of their Green Belt land for housing, the affordability battle is being lost spectacularly. Only in Tandridge has the ratio been held at the 2013 level in 2017, and even this is not an improvement.

⁸ House price to workplace-based earnings ratio, Office for National Statistics, April 2018

⁹ The data uses the ratio of lower quartile house price to lower quartile gross annual (where available) workplace-based earnings.

Figure 3 (j) Change in ratio of house prices to earnings of LPAs with 25% or more of new addresses in the LMGB, 2013 to 2017



Brownfield land is available

Statistics produced by CPRE for their report ‘The State of the Green Belt’, published in August 2018 have revealed that there is a substantial amount of brownfield land available that could be used to accommodate housing development. This data was taken from published brownfield land registers that LPAs are required to compile.

In the 15 LPAs that have permitted 25% or more of new housing to be built on LMGB land between 2013 and 2017 [see figures 3 (i) and 3 (j)], there is a total of 1135 hectares of brownfield land available. Using LPA estimates of the minimum number of dwellings that each site on the register could accommodate, this brownfield land could provide a minimum of 37,073 homes.

In all 66 LPAs with LMGB land, there is a total of 4934 hectares of brownfield land available, which could accommodate a minimum of 260,383 new homes. Compare this with the 202,715 dwellings being proposed on LMGB land in table 3.1 and it is clear that the inflexibility in the distribution of housing growth targets is driving development onto Green Belt land unnecessarily.

The 2018 National Planning Policy Framework contains no provision for situations such as a recession or an increase in interest rates. Both of these situations could affect the marketability of new houses and therefore reduce the rate at which developers would build. Coupled with the reported shortage of skilled construction workers¹⁰, LPAs would be unable to achieve their housing targets and would be forced to provide more greenfield and Green Belt land for development.

¹⁰ https://www.designingbuildings.co.uk/wiki/Tackling_the_construction_skills_shortage

3.6 Future Prospects

Population projections will drive more and more housing growth

According to data from the Office for National Statistics, the population of London is forecast to grow by 8.8% over the 10 year period to 2026 and the South East of England is forecast to grow by 6.4%. This is an additional 774,00 people in London and an addition 574,000 in the South East. On this basis, there is every reason to suppose that erosion of the LMGB will continue in the next decade unless the broken policy on Green Belt is fixed. In the next section we present our recommendations for how this can be achieved.

Table 3 (k) Ten-year population projections for London and the South East

	London	South East
Mid-2016 population	8,770,000	9,030,000
Mid-2026 population	9,543,000	9,605,000
Change over 10 years	774,000	574,000
Percentage increase	8.8%	6.4%

Source: Subnational Population Projections for England: 2016-based, ONS, May 2018

4. Conclusions and Recommendations

4.1 Conclusions

The LMGB is under threat from development and this threat has increased over the three years of our research. In 2018 the threat has accelerated, with a significant increase in the number of dwellings being considered or proposed on LMGB land.

The threats to the LMGB are widespread and numerous, with the majority of LPAs with Green Belt land currently considering or proposing development within the LMGB. Some parts of the LMGB, notably Hertfordshire, Essex and Surrey are under significant threat. There are two geographic clusters of LPAs proposing the largest amount of housing development on LMGB land, to the north of London and to the east. Local Plans are examined singly, albeit in consideration of the Duty to Cooperate. There is currently no mechanism by which the implications of the cumulative impact of the threats is considered, and there is no strategic body tasked with this responsibility.

National planning policy is increasingly ineffective in implementing controls on development within the Green Belt. Policy states that Green Belt boundaries should only be altered in exceptional circumstances, but with 83% of LPAs with land in the LMGB considering releasing Green Belt land for development, such circumstances are no longer exceptional but the norm. The need to meet high housing targets continues to override the policy of protection of the Green Belt, a policy which explicitly seeks to prevent housing growth from encroaching on valued open space. The new National Planning Policy Framework fails to address the problem and the result will be further encroachment on Green Belt land.

National statistics on average housing densities in Green Belt sites show that these developments tend to be low density, demonstrating that they do not represent an efficient use of land. Other Government statistics show clearly that permitting housing developments on land within the LMGB does nothing to address the affordability crisis in the South East of England.

Published data on brownfield land shows that there is sufficient brownfield land available in LPAs with LMGB land to deliver the levels of housing currently proposed on Green Belt land.

With population numbers in London and the South East of England projected to continue to grow in the foreseeable future, pressure on the LMGB will also grow unless Government policy properly addresses the problem. In each 5-year planning cycle, LPAs will face a continued struggle to defend their Green Belt land that people value so much.

4.2 Recommendations

The evidence set out in this report reinforces the recommendations in our 2017 update report and leads us to add to some further recommendations:

National Government should:

- Create a strategic body with responsibility for assessing the integrity of the LMGB, to protect, to promote and to facilitate its positive use and restoration. The Authority should also monitor the condition of the Green belt and take enforcement action where its quality has deteriorated.
- Ensure that exceptional circumstances test in the revised NPPF is fully implemented.

- Clarify, in planning practice guidance, in order to ensure that Green Belt boundaries should not be altered or revised each time council local plans are reviewed, thus ensuring that the boundaries are secure for, as a minimum, the timeframe of a local plan.
- Implement a clear brownfield first policy to ensure suitable brownfield sites and under-utilised land is used before any Green Belt is sacrificed.
- Take a strategic approach to redirecting development from protected areas, such as the LMGB, to those areas with more brownfield opportunities, thereby assisting the rebalancing of the economy and assisting in urban regeneration.
- Develop clear guidance to enable LPAs to revisit, and where necessary recalibrate, housing targets to ensure they are supportable, realistic, and take account of the LMGB. This should acknowledge that in some areas, housing need may not be met where Green Belt is shared across more than one LPA.
- Acknowledge that building on the Green Belt is not the answer to the affordable housing crisis.
- Create a long-term plan to promote forward looking strategies to develop a more attractive and well-used LMGB which delivers greater public benefit.

Local Government should:

- Clearly illustrate that they are making the best use of suitable brownfield sites and under-utilised land before considering use of Green Belt as set out in the revised Green Belt policy in the revised NPPF.
- Proactively identify suitable brownfield sites and other opportunities to redevelop and intensify previously developed land.
- Consider ways to enhance the quality of and access to the Green Belt.

APPENDICES

Appendix 1 Threats to the London Metropolitan Green Belt July 2018:
Summary Table

County	District/Borough	Number of dwellings proposed on Green Belt land	Number of sites proposed on Green Belt land
Bedfordshire	Central Beds	10251	23
	Luton	0	0
Berkshire	Bracknell Forest	1813	18
	Windsor and Maidenhead	5958	26
	Slough	159	22
	Wokingham	0	13
Buckinghamshire	Aylesbury Vale	1819	2
	Chilterns/South Bucks	4310	15
	Wycombe	1861	14
Essex	Basildon	10492	24
	Brentwood	5894	20
	Castle Point	4428	11
	Chelmsford	575	1
	Epping	6826	84
	Harlow	0	0
	Rochford	9960	24
	Southend	0	0
	Thurrock	29635	11
	Uttlesford	16	1
Hertfordshire	Broxbourne	2826	4
	Dacorum	14360	6
	East Herts	13450	12
	Hertsmere	3300	11
	North Herts	13330	12
	St Albans	12345	9
	Stevenage	1350	2
	Three Rivers	4600	Not known
	Watford	0	0
Welwyn Hatfield	5226	12	
Kent	Dartford	Not known	
	Gravesham	Not known	
	Maidstone	0	0
	Medway	225	1
	Sevenoaks	450	1
	Tonbridge and Malling	3500	2

County	District/Borough	Number of dwellings proposed on Green Belt land	Number of sites proposed on Green Belt land
	Tunbridge Wells	0	3
London	Barking and Dagenham	Not known	2
	Barnet	0	1
	Bexley	0	0
	Bromley	Not known	9
	Croydon	740	7
	Ealing	0	0
	Enfield	Not known	5
	Haringey	405	1
	Harrow	127	2
	Havering	Not known	2
	Hillingdon	0	8
	Hounslow	20	11
	Kingston upon Thames	0	0
	Newham	0	0
	Redbridge	3074	4
	Richmond	0	1
	Sutton	9	2
	Waltham Forest	0	0
Surrey	Elmbridge	2460	3
	Epsom and Ewell	2000	9
	Guildford	7276	15
	Mole Valley	Not known	Not known
	Reigate and Banstead	855	9
	Runnymede	4103	11
	Spelthorne	0	0
	Surrey Heath	1500	1
	Tandridge	5093	13
	Waverley	1140	9
	Woking	4954	10
All Local Planning Authorities		202,715	519

Appendix 2 The Key Stages of Local Plan Development

The key stages of Local Plan production are set out in the Town and Country Planning (Local Planning-England) Regulations 2012

- Preparation (Regulation 18): Main consultation opportunity on the draft Local Plan, following which further amendments and adjustments may be made to take account of feedback received. It is important to publish key evidence studies and undertake constructive engagement during this stage and prior to this consultation in order to comply with the Duty to Co-operate.
- Publication (Regulation 19): Final opportunity for comment on the Local Plan prior to submission of the Local Plan for examination. No further changes may be made to this document after this stage. It is not a full public consultation and will not be accompanied by the full range of publicity and participation opportunities undertaken as part of the Regulation 18 consultation, but the 'general' and 'specific' consultation bodies must be notified of the availability of the documents. The Council must collect all responses and compile a Statement of Representations to submit to the Planning Inspectorate.
- Submission (Regulation 22): Dispatch of the required documents to the Planning Inspectorate for Examination. The Government has indicated that it wants all Local Planning Authorities to submit their Local Plans by 'early 2017'.
- Consideration of representations by the appointed person (Regulation 23) Before examining the Local Plan the Inspector must consider the comments ('representations') made on the plan by interested parties.
- Examination in Public (Regulation 24): Planning Inspector will consider the documents submitted and issue a report which states whether he or she considers the Local Plan to be 'sound'. The inspector can recommend 'main modifications' to the submitted plan.
- Receipt of the Inspector's Report (Regulation 25): If the Inspector recommends that the plan is 'sound', then the Council may proceed to adopt the plan as policy. Exceptionally, if the plan is not found sound, then the Council may withdraw it under Regulation 27.
- Adoption (Regulation 26): following receipt of the Inspector's final report, the Council may adopt the Local Plan as a material consideration in the consideration of planning applications under Section 23 of the Planning and Compulsory Purchase Act 2004.

Appendix 3 Acknowledgements

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