



London
Green Belt
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The Right Honourable Boris Johnson MP
The Prime Minister
10 Downing Street
Westminster,
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20th June 2021

Dear Prime Minister,

The London Green Belt Council represents over 100 organisations within the boundary of London's Metropolitan Green Belt.

We are very concerned at a recent planning appeal decision at Roundhouse Farm, Land off Bullens Green Lane, Colney Heath – Appeal A: APP/B1930/W/20/3265925 and Appeal B: APP/C1950/W/20/3265926.

In (para 78) of the attached appeal decision, the Inspector agrees that the proposals would cause harm to the Green Belt and attract substantial weight. However the Inspector goes on to state that both of the Local Authorities (Welwyn and Hatfield and St Albans) who jointly have responsibility for the site, have acute housing delivery shortages and acute affordable housing need.

In a letter to The Rt Hon Theresa May dated 26th October 2016, the Secretary of State says – “It has never been the case that an area of Green Belt can never be altered, but any such changes are locally-led and can be made only in exceptional circumstances by means of the Local Plan Process, following public consultation and independent examination by a planning inspector to ensure the Plan is sound.”

There is an assumption in this statement that changes to the Green Belt will be locally led and this is not the case in this appeal decision. Local people and the Councillors they elect in two authorities were against these applications. From this it could be taken that local views and concerns account for little in such planning decisions, contrary to the statement of the Secretary of State.

In a letter to Members of Parliament for English Constituencies dated the 7th June 2016, Brandon Lewis, the then Housing and Planning Minister stated “The framework makes it clear that inappropriate development may be allowed only where very special circumstances exist and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.”

In paragraph 47 of the appeal decision the Inspector refers to a Written Ministerial Statement of December 2015 which pre-dated the statement referred to above. The inspector appears to infer that because the statement was not subsequently included in the NPPF it carries only little weight. This is disturbing as it would appear that any statement made by either a Secretary of State or Government Minister will carry little weight. Does this infer that any statement given by a Government Minister on any topic is to be given "little weight".

In paragraph 13 of the appeal decision, the Inspector states that "My judgement leads me to conclude that the site strongly resonates with this urban edge definition provided by the 2005 Landscape Strategy." It therefore appears that any part of London's Green Belt which adjoins an urban area would fit into this category. This would mean that, as a result of this appeal any land which forms the border between the Green Belt and the urban area would come in the same category. It could then be inferred that once this site was complete then the adjoining area of Green Belt would be under threat.

In this planning appeal decision, much has been made of the lack of affordable housing. Since 2016 there have either been built or planned nearly 250,000 houses in London's Green belt. There is very little evidence that these will be affordable. Because they are Green Belt greenfield sites in alternative locations, developers are building 4/5 bedrooomed houses with large gardens, therefore at very low density in order to increase profitability.

Where applications for housing have included reasonable numbers of affordable homes, there is evidence that because of the "planning viability assessment" this percentage has been reduced. Local Authorities do not appear to have any powers to enforce the number of affordable homes and yet, the Inspector, in this case, appears to be penalising both authorities.

The London Green Belt Council is very supportive of affordable homes where they can be really affordable, in brownfield land in urban areas where, mostly, the infrastructure is already present. It is Government policy to build on brownfield and yet there is no obligation for Local Authorities to carry out a proper analysis or maintain realistic and up to date brownfield registers. These brownfield sites can provide properly affordable homes within reach of the Green Belt which could provide recreation and relief as it has done during the pandemic.

It has already been inferred by Queen's Counsel that this appeal decision is likely to lead to the watering down of Green Belt protection. The London Green Belt Council requests that this appeal decision is reviewed and reversed in order to protect London's Green Belt for its important role in the climate emergency for future generations.

Yours sincerely

Richard Knox-Johnston

Richard Knox-Johnston

Chair

The London Green Belt Council

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