



The Reigate Society

17th May 2021

Richard Knox-Johnston
London Green Belt Council



The London Green Belt Council

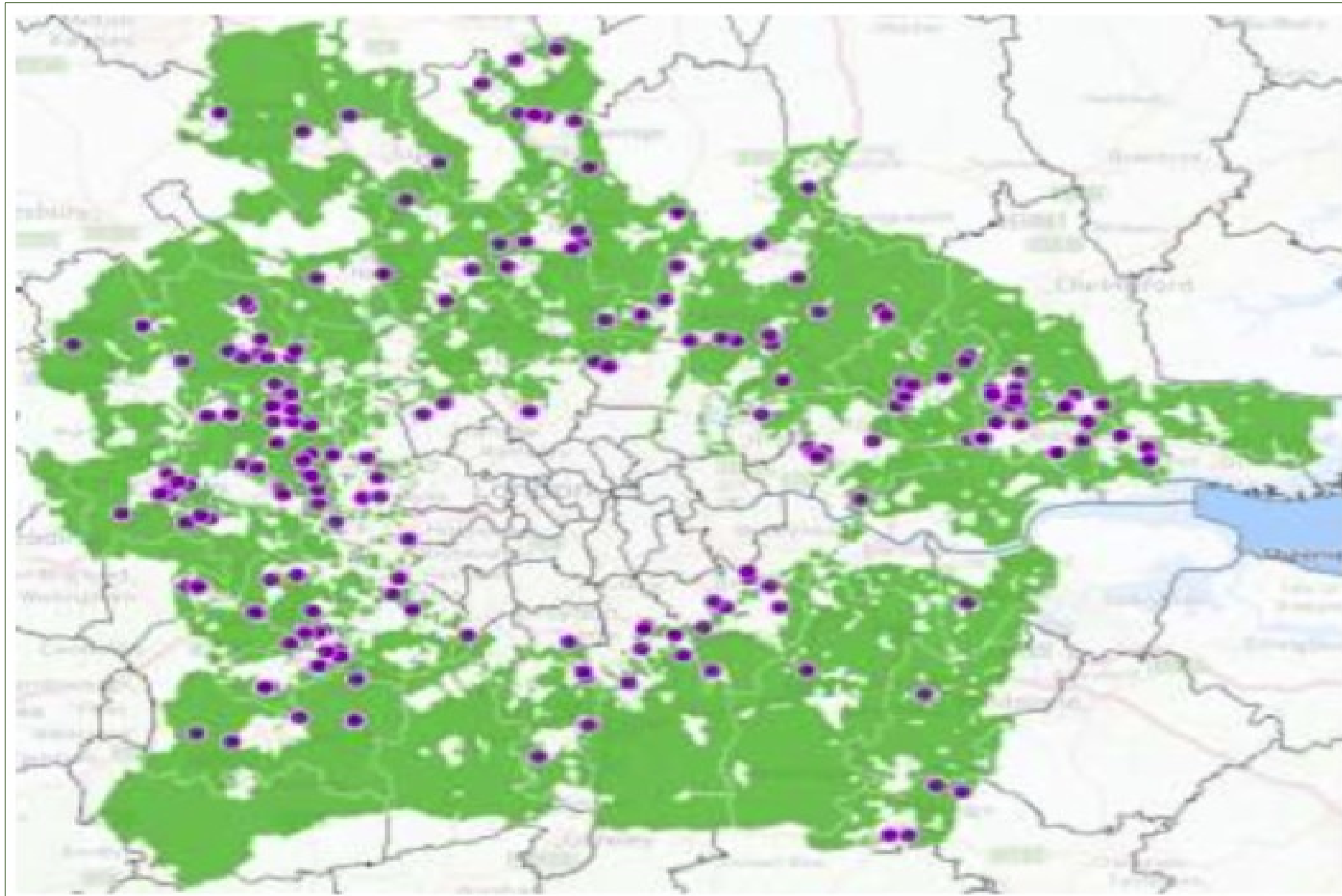
Agenda

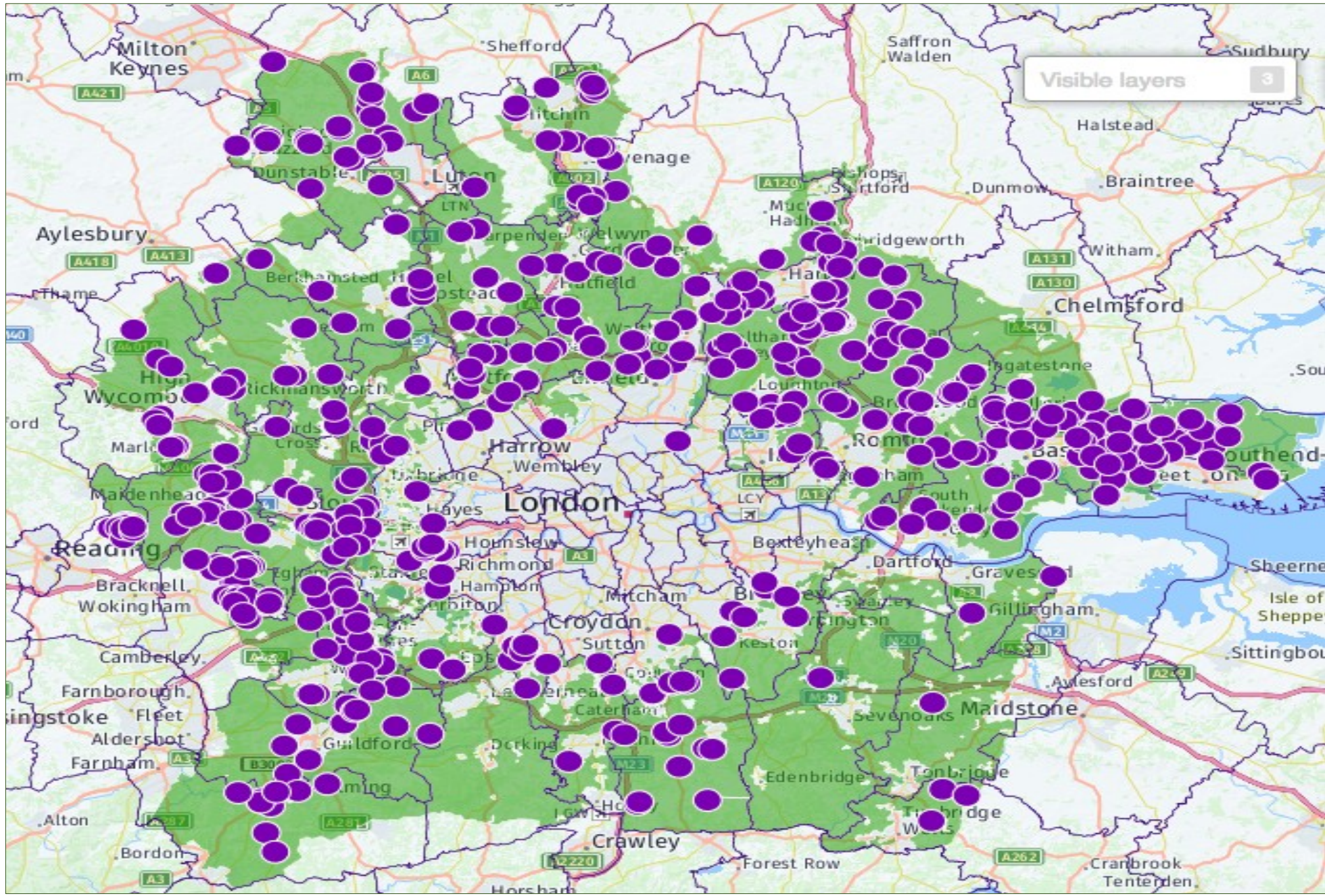


- 1. What is happening to London's Green Belt?**
- 2. How is planning policy being applied?**
- 3. How are LAs and Residents responding?**
- 4. What can LAs do to protect the GB?**
- 5. A positive future for London's GB**



What is happening to London's Green Belt?





'Safe Under Us'? The shrinking of London's local countryside



What is happening to the GB round London



- Currently there are plans to build **233,276** new houses on the land in the LMGB
- The number of LMGB sites earmarked for housing in Local Plans has risen by **211%** since 2016
- The three counties with the greatest threats to their GBs are **Essex, Hertfordshire** and **Surrey**.
- These counties are further ahead with their local plans - the **further** they are in the process the **greater the loss of GB**
- Inspectors at Local Plan reviews are insisting on **GB Reviews** and **GB** loss in spite of Government policy.
- Councillors are keen to profess their keenness for the protection of London's Green Belt but have allowed Planning Officers and Local Plan Inspectors to override their wishes.

What is happening to the GB round London



- The **threats** to London's GB are widespread with **78%** of the **66** Local Planning Authorities (LPAs) currently considering or proposing **development** on LMGB land.
- There is no overall land strategy for the LMGB, the 66 Local Plans are being examined individually with a lack of consistency and coordination.
- There is currently no overall mechanism by which the **cumulative impact** of the threats is being considered resulting in the **loss of land for food production, recreation,** and important **mental health benefits.**
- There is no **overall strategic body** tasked with the responsibility for important **land use planning,** despite the GB being an important cornerstone of the planning system.

What is happening to the GB round London



- National planning policy appears to be **ineffective in implementing controls on development in the GB**. "Exceptional circumstances" is being interpreted by planning officers and inspectors in a somewhat cavalier fashion, resulting in further unnecessary loss of important GB.
- In spite of government ministers' statements to the contrary, **failing to meet housing targets** is being used more frequently to further loss of the LMGB.
- Updates to the National Planning Policy Framework (NPPF) have failed to give GB the protection it needs, if it is not to be continuously eroded. A clearer definition of "**exceptional circumstances**" is urgently required.

What is happening to the GB round London



- Development in the LMGB is **not providing affordable homes**. There is little or no evidence that any affordable development in the LMGB is taking place.
- Development in the LMGB is mainly 4 or 5 bedroomed **low-density** housing and is **not providing homes for young people**.
- Many of the sites proposed will not be on **public transport** routes and will therefore be unsustainable.
- Published data on **brownfield** land shows that there are **sufficient brownfield sites** within those district council areas within LMGB to deliver nearly 250,000 homes - enough to replace all the houses planned for GB land.
- In each five-year planning cycle, the threat to London's Green Belt will continue to increase.



**How is planning policy
being applied?**

How is planning policy being applied?



- **GB reviews**
- **Brownfield**
- **Affordable**
- **Densities**
- **Sustainable**



GB Review

- **Are they obligatory?**
- **“Contributes to all five of the purposes of the Green Belt”**
- **Green Belt Review can conclude that no Green Belt land should be identified for removal.**
- **Only by submitting a LP that suggests GB loss to development may an Inspector consider it**



Rt Hon Sajid Javid MP – 27.04.2018

“Planning Inspectors cannot enforce Green Belt releases onto authorities.

Inspectors can only recommend changes to plans that have been submitted for examination where the plan would otherwise be found unsound, and if requested to do so by the authority.

Ultimately the decision whether to adopt a local plan also rests with the local planning authority itself.”

GB Review



Para 137

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development”



Brandon Lewis – Housing Min 07.06.16

“We have repeatedly made clear that demand for housing alone will not change Green Belt Boundaries”



Jake Berry – Minister DHCLG – 03.04.19

“The NPPF is clear that only in exceptional circumstances may a Green Belt boundary be altered, through the Local Plan process.

Last year we strengthened Green Belt policy in the revised NPPF”.

Affordable



- **Development in the LMGB is not providing affordable homes. There is little or no evidence that any affordable development in the LMGB is taking place.**
- **Development in the LMGB is mainly 4 or 5 bedroomed low-density housing and is not providing homes for young people.**

Sustainable



- **Many of the sites proposed will not be on public transport routes and will therefore be unsustainable.**
- **Car dependent**
- **Close to rail stations!**

Brownfield



- **Why no brownfield review?**
- **Are Brownfield Registers comprehensive?**
- **Are brownfield registers up to date?**
- **Higher densities**
- **Empty homes**

Space to Build, Enfield

- Concerns about proposed development at Crews Hill in Enfield's Green Belt
- Concern that key opportunities were being ignored
- Research undertaken winter 2018/19



Enfield RoadWatch



Concerns & objectives



The countryside charity
London

- Concern opportunities being missed
- Concern over cars – congestion / pollution / carbon
- Concern they were just getting it wrong: Enfield could be better

- Objective – demonstrate room for 36,000 homes/present viable alternative
- Objective – show why the alternative is better for Enfield ('positive density' vs urban sprawl)
- Objective – build a case for when facing the inspector

Higher densities

- **Tower blocks**
- **Cities which are high density**
- **100 homes per hectare**





(context)







How are LAs and Residents responding?

LAs and Residents

- **Sevenoaks**
- **Tonbridge & Malling**
- **Dacorum**
- **Three Rivers**
- **Guildford**
- **Waverley**
- **Tunbridge Wells**
- **Uttlesford**
- **Tandridge**
- **Bracknell Forest**



Surrey County Council elections 20



Conservative	47 (-14)
LibDems	14 (5)
Residents/Independents	16 (7)
Green	2 (1)
Labour	2 (1)

Surrey County Council elections 20



Conservative losses:

- Waverley – lost 3 to LibDems and 1 to Residents
- Guildford – lost 2 to LibDems and 2 to Residents
- Tandridge - lost 1 to Residents

Common denominators:

- Local plan progress
- Loss of Green Belt



What can LAs do to protect the GB?



What can LAs do to protect the GB?

- Question the housing figures for their district
- Use the 2018 ONS figures for realism
- Take into account the 1m emigrations since BREXIT
- Resist a GB review
- Carry out a comprehensive brownfield review
- Look at higher densities
- Wait and see what happens to the Planning Act
- Encourage local community involvement
- Listen to consultation response
- Act as a group

A Positive Vision for London's Green Belt





What can LAs do to protect the GB?

- Covid
- Climate change
- Flooding
- Clean water
- Landscape
- Biodiversity
- Tree planting
- Access
- Recreation
- Health & wellbeing
- Economic benefit

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Recommendations

- **Create a strategic body**
- **Develop a 25 year strategic plan**
- **Protect GB boundaries**
- **Brownfield first**
- **Define exceptional circumstances**
- **Conserve and enhance Green Belt**
- **Encourage access**