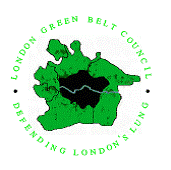
**The London Green Belt Council**

Response

to the

Ministry of Housing, Communities and Local Government’s

White Paper: Planning for the Future

From

The London Green Belt Council

October 2020

1. **Introduction**
   1. The London Metropolitan Green Belt (LMGB) is acknowledged and respected  
       as a model for cities through the world. The London Green Belt Council   
       (LGBC) recently hosted a visit from Seoul, in South Korea, who wanted to find  
       out why London Green Belt was started and what advantages it brought as   
       an environmental, health and welfare and economic asset to London and the   
       country.
   2. The important value of the LMGB has recently been especially acknowledged  
       and supported throughout the Covid - 19 pandemic, as a place of calm  
       and recuperations especially for those confined to living in London. In a  
       recent survey, 68% of respondents in the south east of England   
       acknowledged the importance of the opportunity to enjoy open countryside  
       supporting both its retention and improvement.
2. **The benefits of London’s Green Belt**
   1. The LMGB is the largest of all England’s Green Belts and provides a wide  
       range of positive benefits to all sections of society, not least for the benefit of  
       London and Londoners:

• Climate mitigation and adaptation:   
The LMGB has a positive and key role on supporting efforts to address the climate emergency. For example, providing open land for carbon sequestration through tree planting, the restoration of wildlife and reduction of food miles. It also helps us adapt to a changing climate by cooling our towns and cities as well as absorbing rainwater so reducing the impact of flooding. Green Belt planning policy also generally plays a key role in preventing urban sprawl and low density, car-dependent development, and so helps to reduce carbon emissions in that regard.

• Landscape and biodiversity:   
The LMGB contains landscapes that are highly valued, both in terms of their scenic beauty and for providing space for nature. For example, nearly a quarter of the LMGB is designated as being of outstanding natural beauty (AONB), and there are over 5,000 hectares designated as Local Nature Reserves. These important spaces, near to where people live, boost the health and wellbeing of communities.

• Trees:   
The importance of trees has been highlighted by the climate change debate. The LMGB has a positive role to play in providing the land required as set out in the Government’s 25 Year Plan for the Environment. There is already increased tree planting in the LMGB, which is contributing to the landscape, providing a potential economic benefit as well as sequestering carbon.

• Access and recreation:   
The LMGB contains important recreational land, a resource available to all within the metropolitan area and beyond. It has over 10,000km of public rights of way for the enjoyment of walkers, cyclists and horse riders. Woodland cover stands at nearly a fifth of the LMGB area and, although not all woodland is publicly accessible, it nevertheless represents an important resource for recreation and relaxation.

• Health and wellbeing:   
The countryside on our doorstep enables us to spend time being active or relaxing in a natural setting. This provides good air quality, reduces stress and contributes to mental and physical health. The cost of poor mental and physical health is considerable, both economically and on the wellbeing of people, the loss of productivity and cost of treatment for especially mental illness.

• Local food:   
Food produced locally to London in the LMGB provides high quality, traceable and freshly grown produce for Londoners. Visits to local working farms increases our connection with the natural world around us and has a valuable role to play in education and wellbeing.

1. **Current policy**
   1. Since the first LGBC report “Safe Under Us” in 2016 the data collected has  
       shown that there has either been built, received planning permission or   
       included in local plans enough LMGB land for over 260,000 houses. Of these   
       there is little or no evidence that any of them are or will be “affordable”.   
       They appear to be low density four or five bedroomed houses which are   
       often not sustainable due to being reliant on car travel.
   2. This important and large loss of LMGB has been in spite of Government   
       commitments to protecting Green Belt such as “Safe under Us” and Green  
       Belt being “Sacrosanct”.
   3. Why, in spite of Government pronouncements has this happened?

* There is considerable pressure on Local Planning Authorities (LPA) to provide considerable housing numbers. These have to be proved, normally, within the LPA boundary. This stricture takes no account of designated land such as SSSI, AONB and Green Belt. An example of this is Sevenoaks with 93% Green Belt being forced to build on designated land. There is “Duty to Cooperate” but in Sevenoaks case, they are surrounded by LPAs with large areas of Green Belt who do not have any further designated land. There is a major fault line in Government policy which sacrifices LMGB land.
* LPAs being forced by Inspectors to carry out Green Belt reviews. There appears nothing in the NPPF which forces LPAs to carry out a Green Belt Review as part of the Local Plan process yet many have been forced by the Inspector, appointed by the Secretary of State at the plan review at the examination stage. This in spite of a comment in a letter from the then Secretary of State on the 27th April 2018 that “Planning Inspectors cannot force Green Belt releases onto authorities.” It would appear that many of the appointed inspectors have disregarded this instruction.
* Where Green Belt reviews have been carried out by local authorities, they have not adhered to para 134 of the NPPF. The reviews have catalogued, in most cases, high and low performing Green Belt. It is difficult to see how this qualitative comparison came about. Green Belt, as defined in para 134 has five attributes and they are not comparative.
* Inspectors’ performance at planning inquiries have been somewhat less than consistent. Some have given the lack of an LPA having a five-year supply of housing as a reason for sacrificing Green Belt, once again against the public pronouncement of a Government Minister. (Letter from Brandon Lewis – then Minister for Housing and Planning dated 07/06/2016 – “We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.”)
* There has been little or no encouragement to use brownfield land and as a result Green Belt land has been sacrificed. The reasons are twofold. The first is that developers make much more profit on greenfield sites and do not have the cost of clearing and decontaminating brownfield. Second, there is no encouragement from central government to properly identify and register brownfield sites. This was exemplified recently in a London Borough where residents carried out their own investigation and came up with more than ten times the figure of homes in the brownfield register.
* That brownfield registers are not only out of date but inaccurate. Central Government should enforce a proper analysis and insist that the register is continuously updated.
* With the duty to cooperate under the NPPF, no credit has been given to LPAs whose neighbours also have a large percentage of their land designated such as Green Belt. This ensures that neighbouring LPAs will not want to or be able to accept extra housing numbers.
* This leads on to another concern with the current situation, the fact that each LPA is required to absorb housing within its boundaries regardless of the designation of the land. An example of this is that many LPAs have little other than BMV land and are therefore required to sacrifice that land when a neighbour may have of less quality.

1. **The proposed changes in Planning for the Future**
   1. **Areas that are protected**
      1. Green Belt would come under the third proposal “Areas that are protected”.   
          The White Paper does not appear to give any additional protection than   
          those enjoyed under the present system. There may be greater detail to   
          follow but it would appear that Greenbelt would be under the same threat as  
          at present.
      2. Duty to cooperate is proposed to be deleted and this could remove some of   
          the pressure which, currently, forces further Green Belt release.
      3. It is also suggested that the five-year housing land supply will not be  
          continued and this might give further relief.
      4. The paper also refers to the algorithm for housing numbers and suggests that   
          the methodology could take into account restrains such as Green Belt land.   
          This suggestion is welcomed provided that it is strongly supported and will  
          not be undermined by the Inspectorate. It would need to have a clear  
          statement in the NPPF and further support in Planning Practice Guidance to   
          ensure that it was not misinterpreted.
      5. There would need to be clear understanding of how the methodology would  
          be calculated. For example – would Sevenoaks, with 93% Green Belt in its   
          district boundary, be enabled to reduce its standard housing figure by 93%.  
          Whatever the calculation it would need to be simple and also to be   
          understood by those living within the boundary of the LPA.
   2. **Map based Local Plans (Proposal 7)**
      1. The LGBC would welcome a move to more map-based planning. To be able to  
          see the boundaries of designated areas is always more effective and   
          understandable. There would be added advantages in that plan makers   
          would be able to appreciate the beneficial effects of Green Belt including   
          footpaths and other recreational facilities.
   3. **Neighbourhood Plans (Proposal 9)**

4.3.1. Experience has shown that Neighbourhood Plans have been an excellent  
 example of local involvement in the planning system. Many plans have  
 involved people who do not have experience or knowledge in planning to  
 take an invaluable interest in their local community and its future. They are a  
 valuable asset and should be strongly supported.

4.3.2. However, there appears to be less power in the hands of a neighbourhood by  
 the overriding and overwhelming attitude of some LPAs. This has meant that  
 after considerable work many of these Neighbourhood Plans were forced to  
 be changed. This has caused some disenchantment in the system leading to  
 disillusionment and a lack of enthusiasm to continue with the process.

4.3.3. In order to encourage residents to take an interest in local planning,  
 Neighbourhood need to be retained and strengthened. Powers need to be  
 given to neighbourhoods to be able to negotiate developments within their  
 boundaries together with control of type and design of any housing.

**5. Suggested changes to planning in order to protect and preserve London’s Green   
 Belt.**

**5.1. Create an overall strategy for London’s Green belt**

5.1.1. The LMGB is the largest Green Belt in England and is made up of 66 LPAs. It  
 includes parts of some London Boroughs the GLA and seven counties: Kent,   
 Surrey, Berkshire, Buckinghamshire, Bedfordshire, Hertfordshire and Essex.

5.1.2. Yet the LMGB has no overall authority, there is little consistency in planning  
 and there is no overall strategy for the its long-term future. It has, as stated in section 2, above, an important role to play in the future of this country in that it provides an important and economically valuable resource for the  
 Nation’s capital.

5.1.3. An example of an authority and a long-term strategy is the Ontario Green  
 Belt where its importance and its economic value has been recognised.

**5.2. A clear and unchallengeable definition of a “Protected Area”.**5.2.1. In order to ensure certainty, there need to be a clear and unquestionable  
 definition of a protected area. There is also a need for a clear definition of   
 “special circumstances”.

5.2.2. It is appreciated that there will be a need for some development in Green Belt but currently there is little consistency in some of the decisions made by LPAs and Inspectors. Due to this uncertainty there is continuing challenging of Green Belt boundaries. There is also considerable cost in the timeline of such applications, LPA time and commitment, and in many cases legal action such as planning inquiries and judicial reviews.

**5.3. A Brownfield first policy** 5.3.1. In a letter from the Rt Hon Christopher Pincher (5th October 2020), he states   
 that “Together these show more than 28,000 hectares of brownfield suitable  
 for one million new homes.” CPRE’sresearch has shown that over 500,000   
 brownfield plots have planning permission. This resource would provide all   
 the new homes   
 Government has promised the next four years to 2024.  
   
5.3.2. Brownfield land often has further advantages. It is near the important  
 infrastructure necessary to make it sustainable at little extra cost. Also, there  
 is evidence that more affordable homes are being built on brownfield sites,  
 especially catering for the first-time buyer. Unfortunately, the sites are not   
 being built out.

5.3.3. There needs to be a financial incentive for house builders to build out in a  
 timely way. This could involve, after a reasonable period, paying the council  
 tax on the homes for which they have permission and are yet to be   
 completed. Or, sometimes because of the cost of decontamination, allowing   
 them reduced or no VAT on brownfield development.

5.3.4. There could also be a brownfield first policy, not allowing greenfield building  
 until brownfield id exhausted. This could be linked with VAT on greenfield   
 sites.

5.3.5. A policy which encourages and enforces brownfield recycling would give  
 considerable protection to Green Belt and at the same time, provide more  
 affordable homes.

**5.4. Enforcement powers**

5.4.1. Too often there have been cases of developers buying land in the LMGB   
 and deliberately allowing it to deteriorate or use it for storage or waste in   
 order to attempt to persuade local people and the LPA to allow permission   
 for housing.   
  
5.4.2. Stronger powers of enforcement are needed to ensure LPAs can not only   
 enforce restoration together with financial penalties to ensure that there  
 is no cost to the LPA. Ideally the penalty should reward the LPA.

**5.5. Ownership and option agreement of Green Belt**

5.5.1. Currently not all land is registered at the Land Registry. Also, options  
 taken out by land traders and developers is also not recorded. This is an   
 important lack of information for local people and LPAs. This lack of   
 transparency is not acceptable and all such transactions should be   
 disclosed in future.

**6. Summary**

6.1 The LMGB is the largest Green Belt in England and is an important resource  
 both to England in general and London in particular

6.2 Its importance to the nation is its:

Important assistance in the climate emergency and carbon sequestration  
Beautiful landscape and support for important biodiversity  
Access for recreation  
Land for fresh food production

Importance for health and wellbeing.

6.3. Currently the Green Belt does not have the protection it needs.

6.4. What the LMGB needs is:

An overall strategy for the whole of the LMGB

An authority to ensure consistency in planning and to ensure future  
 funding

A clear and unchallengeable definition of a “Protected Area”

A brownfield first policy  
Stronger enforcement powers

Transparent ownership and options on LMGB land.