

# AGENDA

## Meeting Planning Committee

**Date** Wednesday 18 March 2015

**Time** 2.00 pm

**Place** Committee Room 5, City Hall, The Queen's Walk, London, SE1 2AA

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### Members of the Committee

Nicky Gavron AM (Chair)

Steve O'Connell AM (Deputy Chair)

Tom Copley AM

Kit Malthouse AM

Navin Shah AM

A meeting of the Committee has been called by the Chair of the Committee to deal with the business listed below.

Mark Roberts, Executive Director of Secretariat  
Tuesday 10 March 2015

### Further Information

If you have questions, would like further information about the meeting or require special facilities please contact: John Johnson Committee Officer; Telephone: 020 7983 4926; E-mail: [john.johnson@london.gov.uk](mailto:john.johnson@london.gov.uk); Minicom: 020 7983 4926

For media enquiries please contact External Relations Officer; Telephone: 020 7983 4283. If you have any questions about individual items please contact the author whose details are at the end of the report.

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**Agenda  
Planning Committee  
Wednesday 18 March 2015**

**1 Apologies for Absence and Chair's Announcements**

To receive any apologies for absence and any announcements from the Chair.

**2 Declarations of Interests** (Pages 1 - 4)

Report of the Executive Director of Secretariat.

Contact: John Johnson; email: [john.johnson@london.gov.uk](mailto:john.johnson@london.gov.uk); telephone: 020 7983 4926

**The Committee is recommended to:**

- (a) Note the list of offices held by Assembly Members, as set out in the table at Agenda item 2, as disclosable pecuniary interests;**
- (b) Note the declaration by any Member(s) of any disclosable pecuniary interests in specific items listed on the agenda and the necessary action taken by the Member(s) regarding withdrawal following such declaration(s); and**
- (c) Note the declaration by any Member(s) of any other interests deemed to be relevant (including any interests arising from gifts and hospitality received which are not at the time of the meeting reflected on the Authority's register of gifts and hospitality, and noting also the advice from the GLA's Monitoring Officer set out at Agenda Item 2) and any necessary action taken by the Member(s) following such declaration(s).**

**3 Minutes** (Pages 5 - 52)

**The Committee is recommended to confirm the minutes of the meeting of the Planning Committee held on 22 January 2015 to be signed by the Chair as a correct record.**

The appendix to the minutes set out on pages 9 to 52 is attached for Members and officers only but is available from the following area of the GLA's website:

<http://www.london.gov.uk/mayor-assembly/london-assembly/planning>

## **4 Summary List of Actions** (Pages 53 - 126)

Report of the Executive Director of Secretariat

Contact: John Johnson; [john.johnson@london.gov.uk](mailto:john.johnson@london.gov.uk); 020 7983 4926

**The Committee is recommended to note the outstanding and completed actions arising from previous meetings of the Committee, as listed in the report.**

The appendices to the above item – pages 55 to 126 - are attached for Members and officers only but are available from the following area of the GLA's website:

<http://www.london.gov.uk/mayor-assembly/london-assembly/planning>

## **5 Design Approaches to New Housing Development** (Pages 127 - 130)

Report of the Executive Director of Secretariat

Contact: Paul Watling; [paul.watling@london.gov.uk](mailto:paul.watling@london.gov.uk); 0207 983 4393.

**The Committee is recommended to:**

- (a) Note this report as background to the discussion with invited experts on different design approaches to new housing development in London;**
- (b) Delegate authority to the Chair, in consultation with the Deputy Chair, to agree a future site visit to new developments in London that demonstrate different approaches to delivering high quality and sustainable housing for a range of individuals and families; and**
- (c) Use the discussion on this item to contribute to a response to the revised Housing Supplementary Planning Guidance that is expected to be published for consultation in May 2015.**

## **6 Letter to the Mayor - Tall Buildings and London's skyline** (Pages 131 - 138)

Report of the Executive Director of Secretariat

Contact: Paul Watling; [paul.watling@london.gov.uk](mailto:paul.watling@london.gov.uk); 0207 983 4393.

**The Committee is recommended to note the letter to the Mayor from the Chair of the Committee, as attached at Appendix 1 to the report.**

## **7 Responses to Planning Committee report 'Localism in London: What's the Story?' (Pages 139 - 148)**

Report of the Executive Director of Secretariat

Contact: Paul Watling; [paul.watling@london.gov.uk](mailto:paul.watling@london.gov.uk); 0207 983 4393.

**The Committee is recommended to:**

- (a) Note the responses to the final report on the review of progress in London since the introduction of the Localism Act in 2011; and**
- (b) Build in further follow up and monitoring of the issues raised in Appendix 1 to this report in the development of its future work programme.**

## **8 Planning Committee Work Programme (Pages 149 - 154)**

Report of the Executive Director of Secretariat

Contact: Paul Watling; [paul.watling@london.gov.uk](mailto:paul.watling@london.gov.uk); 0207 983 4393.

**The Committee is recommended to:**

- (a) Note this report that sets out work completed in the Assembly Year 2014/15 (paragraph 3.2 refers);**
- (b) Note the topics being considered in the ongoing work towards drafting a full work programme for 2015/16 (paragraphs 4.4 – 4.10);**
- (c) Delegate authority to the Chair, in consultation with the Deputy Chair, to agree a work programme for approval at the next Committee meeting on 16 June 2015; and**
- (d) Delegate authority to the Chair, in consultation with the Deputy Chair, to agree the main item for the next Committee meeting on 16 June 2015.**

## **9 Date of Next Meeting**

The next meeting of the Committee is scheduled for 16 June 2015 at 10am in Committee Room 5, City Hall (subject to confirmation at the Annual Assembly meeting on 13 May 2015).

## **10 Any Other Business the Chair Considers Urgent**

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# Subject: Declarations of Interests

**Report to: Planning Committee**

**Report of: Executive Director of Secretariat**

**Date: 18 March 2015**

**This report will be considered in public**

## 1. Summary

- 1.1 This report sets out details of offices held by Assembly Members for noting as disclosable pecuniary interests and requires additional relevant declarations relating to disclosable pecuniary interests, and gifts and hospitality to be made.

## 2. Recommendations

- 2.1 **That the list of offices held by Assembly Members, as set out in the table below, be noted as disclosable pecuniary interests<sup>1</sup>;**
- 2.2 **That the declaration by any Member(s) of any disclosable pecuniary interests in specific items listed on the agenda and the necessary action taken by the Member(s) regarding withdrawal following such declaration(s) be noted; and**
- 2.3 **That the declaration by any Member(s) of any other interests deemed to be relevant (including any interests arising from gifts and hospitality received which are not at the time of the meeting reflected on the Authority's register of gifts and hospitality, and noting also the advice from the GLA's Monitoring Officer set out at below) and any necessary action taken by the Member(s) following such declaration(s) be noted.**

## 3. Issues for Consideration

- 3.1 Relevant offices held by Assembly Members are listed in the table overleaf:

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<sup>1</sup> The Monitoring Officer advises that: Paragraph 10 of the Code of Conduct will only preclude a Member from participating in any matter to be considered or being considered at, for example, a meeting of the Assembly, where the Member has a direct Disclosable Pecuniary Interest in that particular matter. The effect of this is that the 'matter to be considered, or being considered' must be about the Member's interest. So, by way of example, if an Assembly Member is also a councillor of London Borough X, that Assembly Member will be precluded from participating in an Assembly meeting where the Assembly is to consider a matter about the Member's role / employment as a councillor of London Borough X; the Member will not be precluded from participating in a meeting where the Assembly is to consider a matter about an activity or decision of London Borough X.

<b>Member</b>	<b>Interest</b>
Tony Arbour AM	Member, LFEPA; Member, LB Richmond
Jennette Arnold OBE AM	Committee of the Regions
Gareth Bacon AM	Member, LFEPA; Member, LB Bexley
John Biggs AM	
Andrew Boff AM	Congress of Local and Regional Authorities (Council of Europe)
Victoria Borwick AM	Member, Royal Borough of Kensington & Chelsea; Deputy Mayor
James Cleverly AM	Chairman of LFEPA; Chairman of the London Local Resilience Forum; substitute member, Local Government Association Fire Services Management Committee
Tom Copley AM	
Andrew Dismore AM	Member, LFEPA
Len Duvall AM	
Roger Evans AM	Committee of the Regions; Trust for London (Trustee)
Nicky Gavron AM	
Darren Johnson AM	Member, LFEPA
Jenny Jones AM	Member, House of Lords
Stephen Knight AM	Member, LFEPA; Member, LB Richmond
Kit Malthouse AM	Deputy Mayor for Business and Enterprise; Deputy Chair, London Enterprise Panel; Chair, Hydrogen London; Chairman, London & Partners; Board Member, TheCityUK
Joanne McCartney AM	
Steve O'Connell AM	Member, LB Croydon; MOPAC Non-Executive Adviser for Neighbourhoods
Caroline Pidgeon MBE AM	
Murad Qureshi AM	Congress of Local and Regional Authorities (Council of Europe)
Dr Onkar Sahota AM	
Navin Shah AM	
Valerie Shawcross CBE AM	Member, LFEPA
Richard Tracey AM	Chairman of the London Waste and Recycling Board; Mayor's Ambassador for River Transport
Fiona Twycross AM	Member, LFEPA

[Note: LB - London Borough; LFEPA - London Fire and Emergency Planning Authority; MOPAC – Mayor's Office for Policing and Crime]

3.2 Paragraph 10 of the GLA's Code of Conduct, which reflects the relevant provisions of the Localism Act 2011, provides that:

- where an Assembly Member has a Disclosable Pecuniary Interest in any matter to be considered or being considered or at
  - (i) a meeting of the Assembly and any of its committees or sub-committees; or
  - (ii) any formal meeting held by the Mayor in connection with the exercise of the Authority's functions
- they must disclose that interest to the meeting (or, if it is a sensitive interest, disclose the fact that they have a sensitive interest to the meeting); and



- must not (i) participate, or participate any further, in any discussion of the matter at the meeting; or (ii) participate in any vote, or further vote, taken on the matter at the meeting

#### UNLESS

- they have obtained a dispensation from the GLA's Monitoring Officer (in accordance with section 2 of the Procedure for registration and declarations of interests, gifts and hospitality – Appendix 5 to the Code).

- 3.3 Failure to comply with the above requirements, without reasonable excuse, is a criminal offence; as is knowingly or recklessly providing information about your interests that is false or misleading.
- 3.4 In addition, the Monitoring Officer has advised Assembly Members to continue to apply the test that was previously applied to help determine whether a pecuniary / prejudicial interest was arising - namely, that Members rely on a reasonable estimation of whether a member of the public, with knowledge of the relevant facts, could, with justification, regard the matter as so significant that it would be likely to prejudice the Member's judgement of the public interest.
- 3.5 Members should then exercise their judgement as to whether or not, in view of their interests and the interests of others close to them, they should participate in any given discussions and/or decisions business of within and by the GLA. It remains the responsibility of individual Members to make further declarations about their actual or apparent interests at formal meetings noting also that a Member's failure to disclose relevant interest(s) has become a potential criminal offence.
- 3.6 Members are also required, where considering a matter which relates to or is likely to affect a person from whom they have received a gift or hospitality with an estimated value of at least £25 within the previous three years or from the date of election to the London Assembly, whichever is the later, to disclose the existence and nature of that interest at any meeting of the Authority which they attend at which that business is considered.
- 3.7 The obligation to declare any gift or hospitality at a meeting is discharged, subject to the proviso set out below, by registering gifts and hospitality received on the Authority's on-line database. The on-line database may be viewed here:  
<http://www.london.gov.uk/mayor-assembly/gifts-and-hospitality>.
- 3.8 If any gift or hospitality received by a Member is not set out on the on-line database at the time of the meeting, and under consideration is a matter which relates to or is likely to affect a person from whom a Member has received a gift or hospitality with an estimated value of at least £25, Members are asked to disclose these at the meeting, either at the declarations of interest agenda item or when the interest becomes apparent.
- 3.9 It is for Members to decide, in light of the particular circumstances, whether their receipt of a gift or hospitality, could, on a reasonable estimation of a member of the public with knowledge of the relevant facts, with justification, be regarded as so significant that it would be likely to prejudice the Member's judgement of the public interest. Where receipt of a gift or hospitality could be so regarded, the Member must exercise their judgement as to whether or not, they should participate in any given discussions and/or decisions business of within and by the GLA.

## **4. Legal Implications**

- 4.1 The legal implications are as set out in the body of this report.

## 5. Financial Implications

5.1 There are no financial implications arising directly from this report.

<b>Local Government (Access to Information) Act 1985</b>
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List of Background Papers: None
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Contact Officer: John Johnson, Committee Officer
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Telephone: 020 7983 4926
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E-mail: John.Johnson@london.gov.uk
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# MINUTES

**Meeting: Planning Committee**  
**Date: Thursday 22 January 2015**  
**Time: 10.00 am**  
**Place: Committee Room 5, City Hall, The Queen's Walk, London, SE1 2AA**

Copies of the minutes may be found at:

[www.london.gov.uk/mayor-assembly/london-assembly/planning](http://www.london.gov.uk/mayor-assembly/london-assembly/planning)

**Present:**

Nicky Gavron AM (Chair)  
Steve O'Connell AM (Deputy Chair)  
Andrew Boff AM  
Tom Copley AM  
Navin Shah AM

## **1 Apologies for Absence and Chair's Announcements (Item 1)**

- 1.1 An apology for absence was received from Kit Malthouse AM, for whom Andrew Boff AM substituted.

## **2 Declarations of Interests (Item 2)**

- 2.1 The Committee received the report of the Executive Director of Secretariat.

2.2 **Resolved:**

**That the list of offices held by Assembly Members, as set out on the table at Item 2 on the agenda, be noted as disclosable pecuniary interests.**

### **3 Minutes (Item 3)**

#### **3.1 Resolved:**

**That the minutes of the meetings of the Planning Committee held on 18 November 2014 be signed by the Chair as a correct record.**

### **4 Summary List of Actions (Item 4)**

4.1 The Committee received the report of the Executive Director of Secretariat.

#### **4.2 Resolved:**

**That the outstanding action arising from a previous meeting of the Committee, as listed in the report, be noted.**

### **5 Localism in London (Item 5)**

5.1 The Committee received the report of the Executive Director of Secretariat.

#### **5.2 Resolved:**

**That the Committee's report *Localism in London: What's the Story?*, as set out at Appendix 1 to the report, be agreed.**

### **6 Options for Accommodating London's Growth (Item 6)**

6.1 The Committee received the report of the Executive Director of Secretariat as background to putting questions to the following guests:

- Jonathan Manns, Director of Planning, Colliers International;
- Catriona Riddell, Director, Catriona Riddell Associates;
- Dr Marcel Steward, Environmental Risk and Insurance Consultant;
- Noel Farrer, President, Landscape Institute;
- Philipp Rode, Executive Director, LSE Cities;
- Paul Miner, Senior Planning Officer, Campaign to Protect Rural England (CPRE);

- Alison Young, Chief Planning and Regeneration Officer, London Borough of Redbridge; and
- John Pearce, Head of Planning Policy and Environment, London Borough of Redbridge.

6.2 A transcript of the discussion is attached at **Appendix 1**.

6.3 During the discussion, guests (as specified below) agreed to supply the Committee with information on –

- The Hackney development with 50% social housing – with a view to a possible site visit by Members (Philipp Rode);
- The ‘hardcore’ brownfield sites in London (Paul Miner); and
- The percentage and area of green belt and brownfield land contained within Redbridge’s 40 regeneration sites, and details of what is being proposed in terms of housing numbers and typology (Alison Young/John Pearce).

6.4 **Resolved:**

**That the report and discussion with guests on the options for accommodating London’s growth, and the commitments outlined in paragraph 6.3 above, be noted.**

## **7 Planning Committee Work Programme 2014/15 (Item 7)**

7.1 The Committee received the report of the Executive Director of Secretariat.

7.2 **Resolved:**

**(a) That the Committee’s work programme for the remainder of 2014/15, as set out in the report, be noted;**

**(b) That the Chair and Deputy Chair agree outside of the meeting the details of the main agenda item for the meeting on 18 March 2015.**

## **8 Date of Next Meeting (Item 8)**

8.1 The next meeting is scheduled for 18 March 2015 at 2pm in Committee Room 5, City Hall.

**9 Any Other Business the Chair Considers Urgent (Item 9)**

9.1 There was no other business.

**10 Close of meeting**

10.1 The meeting ended at 12.40pm.

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Chair

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Date

**Contact Officer:** John Johnson Committee Officer; Telephone: 020 7983 4926; E-mail:  
john.johnson@london.gov.uk; Minicom: 020 7983 4926

## Planning Committee – 22 January 2015

### Transcript of Item 6 – Options for Accommodating London’s Growth

**Nicky Gavron AM (Chair):** We are organising this into a number of sections. The first section is a very brief one that I will open with, which is looking at the extent of both brownfield and underdeveloped land. Then we are going to move on to a quite substantial section on the barriers to developing brownfield land and what the Mayor could do about it. Then we will be looking at suburban intensification and some of the opportunities or barriers, again, around that and at growth in the rest of the southeast and the possibilities there for accommodating some of London’s growth. Finally, we will be looking at the Green Belt and making it fit for the 21<sup>st</sup> century and at what the different proposals are.

If I can kick off, probably starting first with the Campaign to Protect Rural England (CPRE) and Paul, just looking at what you think. There are different estimates for how much brownfield land there is. Certainly we have been here 15 years as the Greater London Authority (GLA) and the 1997 Government really came in with a prioritisation of brownfield, which has now been relaxed. We have a situation where we have been prioritising brownfield and have been extremely successful at so doing, but do you think there are limits to that and how much brownfield do we have left?

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** Brownfield land is a renewable resource and in London, as in the rest of the country, its supply is far from drying up. In 2011, we commissioned Green Balance to do a report called *Building in a Small Island*, which was an analysis of Government figures provided in the Land Use Change Statistics and in the National Land Use Database between 2001 and 2009. What that found is that between those eight years, only 35% of the brownfield plots that have become available for housing development in London in the National Land Use Database were redeveloped. About 166,000 houses were built in London over that period; yet over this time brownfield sites capable of accommodating 469,000 homes became available.

More recently, with the report we published last year called *From Wasted Spaces to Spaces for Living*, with the University of the West of England (UWE) in Bristol, we also found that returns to the National Land Use Database which come from local planning authorities – so, in London, the boroughs – appear to be significantly underestimating the brownfield potential in London. The National Land Use Database returns, for example, found that there was enough brownfield land for about 146,000 houses currently, but the draft Further Alterations to the London Plan (Further Alterations) have identified a series of brownfield opportunity areas across London. The Further Alterations say that there is enough brownfield land in these areas for 300,000 new homes, plus 568,000 jobs, which is twice the capacity of brownfield that the boroughs had said was available to the National Land Use Database. Therefore, we would say that the supply of brownfield land in London is far from drying up.

There is another point to bear in mind as well that was discussed in the Further Alterations, which is what London’s overall housing need is and what amount of housing is likely to be built. Some population projections have suggested that London needs 62,000 houses a year. The GLA, I believe, is currently planning on the basis of about 49,000 a year. People may wish to correct me on that.

**Steve O’Connell AM (Deputy Chair):** It is 42,000.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** Sorry, 42,000, but I know they are under different scenarios. However, what is important to remember is that in recent years only about 22,000 houses have been built in London per year on average. There is a question now about what is going to be realistically built and also whether what is going to be built is going to meet the need for affordable housing as opposed to just meeting a demand for housing in London. It is critically important in the London context and to be able to differentiate between demand and need, which the National Planning Policy Framework (NPPF) does not do adequately. Therefore, we have to consider how much we are actually going to realistically build in London in the coming years. Probably the GLA's approach at the moment is a realistic assessment of what is actually going to be built. However, if we are going to build more, we also need to consider what canvas we are looking at as well. What wider canvas we are looking at is not the greatest (Inaudible) as other regions and we will probably come on to that discussion later. In conclusion, we would say that there is still plenty of brownfield land available for development.

**Nicky Gavron AM (Chair):** Thank you for that, Paul. What you are talking about is nine years' supply and, if we look further out, we need about 1.5 million by 2050. I just want to set that. I am going to come back to you and explore some more options. When you talk about brownfield, we know that a lot of the brownfield sites that are identified are those where there is infrastructure or the potential - or planned potential - for infrastructure. However, we also know that there are sites which could be unlocked - and I am just wondering whether they are in your calculations or not - if there were the infrastructure.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** The work that we did with UWE, again, which was based on the National Land Use Database, was always going to be a very conservative estimate of the amount of brownfield land that is available for development because it looked at only four of the five categories that were in the National Land Use Database and in which local authorities were making returns. These were sites primarily with planning permission or some kind of planning status. What the report did not look at was brownfield sites that a local authority felt had some scope for redevelopment in future but which was currently already in use or already had some kind of ownership of it. If you factor that in, it is likely to add a significant amount to the total. There is a problem with, again, current planning approaches across the country at the moment in that they are looking only at sites that developers say are available, which is the Strategic Housing Land Availability Assessment approach.

**Nicky Gavron AM (Chair):** Let us just be clear. Your total is based on the National Land Use Database, which you believe to be very conservative and is what has been given to you by the developers themselves?

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** By local planning authorities, yes.

**Nicky Gavron AM (Chair):** That is usually quite a risk-averse group. Jonathan, you have done work, too, on how much brownfield there is. Could you tell us about that?

**Jonathan Manns (Director of Planning, Colliers International):** I have not myself assessed the brownfield capacity of London at all, but I am quite keen that there is a discussion about it, which is fantastic because it is happening right now. Therefore, the only comments that I would have relate to the fact that we need to think about London's growth in a strategic manner. In terms of the viability of redeveloping brownfield sites, they become commercially attractive only at the point where the residential values outstrip the existing use value of the site. That in itself has implications to the extent that whilst a lot of the



brownfield capacity surveys that have been undertaken certainly identify various sites that could be redeveloped for housing, we invariably also need distribution centres to meet demand. We need employment bases and areas as well. There is an inherent conflict that is only going to intensify over the coming years when residential values do start outstripping commercial ones and people start eroding our employment stock to the same extent. Therefore, unless we are actually looking at the provision of housing, the brownfield capacity and the release of land elsewhere in a more joined-up manner, then I suspect that actually there are two competing issues at the heart of all the research that is being done at the moment.

**Nicky Gavron AM (Chair):** Can I come back to you, Paul? Do the statistics you have come up with include the land needed for infrastructure to service the homes?

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** They do not include brownfield sites that local authorities believe are suitable for employment uses or offices or other types of development. They do not include infrastructure requirements in themselves. We have done some work in the past on this, *Compact Sustainable Communities*. That work references some work in the past which suggested that you need about 13 hectares of infrastructure for every 5,000 homes you build, I think. We can come back to the Assembly on this because there is some further work that has been done on this that we can supply information separately to you about. Therefore, on the one hand, it does not include infrastructure, but what it also deliberately excludes in brownfield. We do not include in the figures I gave you earlier brownfield sites which local authorities have identified as being suitable for employment, retail or non-housing uses. There is quite a bit more of this brownfield land available. Only 50% or so of all brownfield sites are identified as suitable for housing.

**Nicky Gavron AM (Chair):** Yes. Alison?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** I just wanted to add something to the points that Jonathan [Manns] was making. From a practical perspective, obviously, as a local planning authority dealing with applications on a daily basis, we have had quite a few large industrial sites vacated as people outside or around the M25. What we find is that because of the abnormalities of developing those sites - the remediation costs, the costs of removing infrastructure and existing buildings - frequently the developer will come back and the applicant will say to us, "In that case, we have a very borderline viability case and so we wish to compromise on your standards for, say, affordability or on contributing to local infrastructure like education requirements". Therefore, you may be getting development and theoretically on paper it looks like there is land supply, which there is, but is it the right kind of development to go forward? Is it actually going to contribute to the growth of sustainable communities? Equally, often because they are constrained sites with dealing with infrastructure in and around them, you are often compromising on design quality as well. I am not suggesting that we do not use brownfield sites; we absolutely have to. However, they are brownfield and have been sitting there on the Land Registry for decades for very good reasons.

**Nicky Gavron AM (Chair):** Interesting. Would anyone be able to come back on that?

**Noel Farrer (President, Landscape Institute):** I would, if that is OK. The first thing from a design point of view is you can turn any site, however bad it is, into something that is beautiful. We need to be aware of that. You can make a silk purse out of a sow's ear. It has been done; the Olympic Park is a very good example and there are many others. That is the first point.

The second point just in answer to that question is that viability is an issue around time and urgency and it is around a whole set of pragmatic issues, it seems to me. When you have these large urban brownfield sites, it seems very clear that we cannot shirk our responsibilities of not looking to turn those sites around about their viability. I accept that there may be costs in relation to the fact that we are not going to be able to see the benefits that we would normally expect out of those sites through section 106, the Community Infrastructure Levy (CIL) and other contributions that we can make. But surely, in the larger picture from a London point of view, we have to look at ways of creating an environment where those sites can come forward rather than the far worse scenario of building on greenfield and green belt sites in the short-term. I have just mindfully done quite a bit of master planning work down at Thamesmead for the Peabody Trust and I have had a look at that. Thamesmead is in the urban environment. There is no question that you can put many thousands of homes on Thamesmead, but it is very difficult to do because of just the types of issues that you are absolutely talking about.

The other point that I was reminded of when John [Pearce] was speaking earlier which is important is that there is a geographical issue. I quite understand that some London boroughs will find this very difficult, whereas other London boroughs will have significantly greater potential. That necessary variation of need, which will come from the GLA and which is recognised in its targets, needs to be recognised as well so that the demands are appropriate.

**Nicky Gavron AM (Chair):** I will maybe ask Jonathan first. Have you also looked at emerging sites? It was said by Paul [Miner] that sites are emerging. There are new sites. If Tesco vacates their sites, we know they are windfall sites, or with a hospital. We may not like the closure of hospitals and rationalisation, but it is leading to more sites becoming available. Have you factored that in?

**Jonathan Manns (Director of Planning, Colliers International):** Paul [Miner] is absolutely right. It is a renewable resource. Everything that is built already could be redeveloped for something else. That said, looking at actually how we do that is a slightly different issue. Where development happens in London and what infrastructure is required to support that are all considerations that have to be factored in.

To come back on the previous point around brownfield and how it comes forward, at the moment I am advising on a site that sits just outside the GLA's administrative area. It is one of three remaining brownfield sites in this local authority. It is very keen, understandably, to see it come forward because the rest of the borough is constrained by a tight green belt. Unfortunately, the remediation costs there are some £2 million. This is precisely the point Alison [Young] was making. There is a real issue about how that is delivered. You could deliver it and you could compromise on the plan objectives, but at the same time someone else could come in with a housing need argument and build on the greenfield adjacent to it in a far more cost-effective and deliverable way. The way that the planning system is structured at the moment is such that actually, unless we are compromising on certain elements to ensure the delivery of some sites, we are actually almost facilitating, supporting and encouragement in less sustainable locations. That would be my thoughts on that.

**Nicky Gavron AM (Chair):** I wanted to also bring out underdeveloped land, but we can bring that out under another question. It might be a good moment now, Tom, to bring you in and to start talking about the barriers to brownfield because there have been mentions of remediation and the costs and so on and it is a good prelude for the kinds of things that initially Marcel [Steward] might focus on. Tom?

**Tom Copley AM:** Yes. As Nicky says, I would like to explore what the barriers are and, more crucially, how we can overcome those barriers. Marcel, I know you have done a lot of work on this and so perhaps you would like to kick off on this section.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** OK. Thank you very much. Part of the problem when we are dealing with contaminated land is that there is this empirical belief that there is a single solution. The whole issue of contaminated land is that it is multiple in terms of its solutions and also in terms of the vested interests of the various parties within it.

Because of that, we have this very siloed approach in terms of, "I am the local authority. This is my position. Do I enable this? Do I take responsibility for giving planning permission to go ahead with this? Do I have the resources to handle that?" If I am looking at the owner of the land or the entity that is actually selling the land, there is a situation whereby under the current legislation the attachment of liability is extremely unclear. There is provision under the legislation, the Environmental Protection Act (EPA) 1990, with regard to the attachment of liability to land. First of all, there is the polluter-pays principle but, as we know, we were the heartland under the Industrial Revolution and so in many instances the polluters are no longer existent and therefore it attaches to the deed of title to the land or the right to charge rent on the land. If I am selling the land --

**Tom Copley AM:** The person who owns the land is responsible essentially for cleaning up or may be?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** He may be, if he is, yes. We still have adherence to the principle of caveat emptor in this country or 'buyer beware'. Under the legislation, there is the opportunity to transfer liability of the land with information, which goes against the adherence to the principle of caveat emptor. There is no definition as to what information constitutes full disclosure or transfer of information.

**Tom Copley AM:** If you are buying a piece of land, you can go to the landowner and say, "Tell me exactly how it is contaminated and what the costs associated might be", and the owner is under no obligation to tell you?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** He can say, "I do not know". He can say, "You have access to the records. You make your own investigations and find out".

There is also provision under the legislation to transfer the liability by discounting the market costs of the land via the cost of the remediation. There are two problems with that. One is that in terms of trying to quantify remediation of a site, it is extraordinarily difficult. It has been quoted that trying to provide a cost for a land remediation even on a fairly well-documented site is a bit like writing an open cheque. That is the case. I have investigated sites where under exceptional circumstances we had, for instance, sampling points at 25-metre centres and still there was information that came out during the actual remediation which blew the figures to hell.

The second issue that is related there is in regard to the fact that liability can be transferred, as I say, if the cost of the land is discounted. There are no standard valuations for the valuation of contaminated assets. There is no process for the standard valuation of a contaminated or compromised asset. There is no, to the best of my knowledge, Royal Institute of Chartered Surveyors (RICS) standard and in fact most valuation reports will

contain a caveat at the end that says, "This asset has been valued at open-market rates as it stands", or words to that effect, taking no account of the fact that the land is contaminated.

**Tom Copley AM:** The open market itself might surely take account of the fact that it is contaminated. Surely a piece of contaminated land would be lower in value than an equivalent piece of uncontaminated land?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** If we do not think about the contamination question at all and we would really quite like just to build, would we actually do that calculation?

If you look at very large contaminated sites, you will also have to address the situation that many of them were carried out by special-purpose vehicles (SPVs) and consortia of entities, many of which are debt-funded back to the parent. Therefore, in a situation where the contamination remediation exceeds, there is always the possibility to fold the SPV and to actually walk away and leave the site as it is. Again, it is this attachment of liability.

If that worked and if we had a standard means of valuation and we could show how we could discount the value on a standard basis against the cost of the asset, then that builds in some of the issues with regard to the extra cost of the development of contaminated land.

**Tom Copley AM:** I guess the question is, firstly, whether you would advocate that there was a legal requirement of full disclosure and, secondly, how you address that question of coming to this valuation.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Where we are at here is that there has to be a concerted effort, first, in the enforcement of the legislation that does exist and that has to happen at both local and national level. Currently, I would have said it is probably being fairly passive in terms of its implementation. There has to be a clear declaration of where responsibility lies. At the moment, it could lie either with the local authority or it could lie, in the case of special sites, with the Environment Agency.

**Tom Copley AM:** Does that require a change in the law or a clarification?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** It requires a clarification. However, also, it needs a more holistic approach. I said in the beginning that we are suffering from a lack of information and the fact that we have a siloed approach. The local says, "This is my area", the developer says, "This is what I am trying to achieve", the owner of the land says, "I am trying to achieve this", and we have this conflict of interests.

Because of the lack of ability to standardise valuations, it is difficult to show that the valuation discount is such that the liability has been transferred. That then replicates down the chain when we are looking at the viability of contaminated land. Before I go there, let me take you to another place. If I have discounted the land --

**Tom Copley AM:** As the owner of that land?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** -- as the owner of the land and we have sorted, somehow, the disclosure of information situation and I have sold it to you, you are maybe less financially robust or your calculations were wrong. Maybe it is a situation whereby you are a debt-funded SPV and you subsequently go out of business because this site has caused you problems. Even though I have taken

the hit in terms of the devaluation, it will still come back on me and that is a risk in perpetuity. Therefore, that is a disincentive in terms of --

**Tom Copley AM:** All right. Hang on. If you have sold it, surely, why does the risk not then lie with the owner who has gone bust?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** The original polluter --

**Tom Copley AM:** Under the legislation that you talked about earlier, the original polluter is still --

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** They are the primary party, but in most instances with contaminated land they are no longer extant. They are no longer around. It could be Victorian --

**Steve O'Connell AM (Deputy Chair):** The person who bought it off them in the first place and then sold it to you has the responsibility?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** That person could have, if they are existing. The problem we are dealing with, especially with many of our inner-city areas of brownfield land, is that we are dealing with Victorian - or older - pollution and contamination.

**Tom Copley AM:** If there was an old electricity company that no longer exists and the land has then been maybe sold twice to someone and to you and so you own it, you are legally responsible, are you?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Even if I was not the polluter.

**Tom Copley AM:** Even if you were not the polluter. Then, if you sell it to me at a discount, factoring that in, and I go bust, it comes back on you?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** The responsibility is back on me.

**Tom Copley AM:** It comes back on you?

**Andrew Boff AM:** I did not know that.

**Tom Copley AM:** I had no idea. It sounds quite remarkable.

**Nicky Gavron AM (Chair):** Marcel, you have worked quite hard on solutions to all of this, have you not? It would be good to hear something of what you --

**Tom Copley AM:** Yes. It would be good to hear what the answers to the problem are. I am just quite shocked that that is the case.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** That is the disincentive in terms of, "I own a piece of land and I may sell it, even though it is no longer useful to me".

**Nicky Gavron AM (Chair):** We have to be clear. Part of what we are trying to probe is why a lot of people do not want to go near brownfield. They are risk-averse and so on. Brownfield is harder to develop, etc. That is the perception. What is the answer?

**Tom Copley AM:** What is the answer to this problem?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Can I just take it one step further? If you have a brownfield site and you have developed it for housing to meet some of the housing need for London, how you sell that land does have an impact in terms of where the liability attaches going forward. If I am looking at this from the perspective of wanting to buy a house and I am a mortgage provider looking at providing a mortgage on that house, how do I value that asset? Which portion of that liability would attach to that house-owner? Therefore, how do I value that for the purpose of lending a mortgage?

**Tom Copley AM:** Once it has been decontaminated, presumably, or developed --

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** No. We have abandoned the concept in this country, as have most places, of remediation for multipurpose end use. We have remediation for various end uses subject to sensitivity of which the most sensitive is housing and gardens.

**Andrew Boff AM:** It is like the Olympic site. It was remediated only to the point of one metre below the surface and then there is a membrane. Under that, we still have contaminated land.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Exactly.

**Tom Copley AM:** OK. Then the problem when you have, say, individual freeholders perhaps is how you then --

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** (Inaudible) situation and then what is the viability of that (Overspeaking)

**Tom Copley AM:** How was that done on the Olympic Park, say?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** On the Olympic Park, I do not know. I was not involved in that. However, it is a legacy issue that will go forward. On remediation, you have brought up a very good point, which is that most people think that once it has been cleaned it is clean. It is not. If I am a developer and I have worked out the site, I have worked out how I am going to remediate it and I go to you as the planning entity in the authority and say, "That is what I am going to do. If I do that, is that OK?", the planning authority may say, "I do not see any reason why we should object", if I go to the Environment Agency and say, "That is what I am going to do. Is that sufficient to allow it to go ahead?". They will say, "We do not see any reason to object". However, under the EPA 1990, at any point in the future when further information is known and as our knowledge advances, there is the built-in ability to come back and say, "Do you know that remediation? You know the stuff we left there because we did not think it mattered? We now know it is harmful. Go back and do it again". That is why this is a risk in perpetuity.

**Tom Copley AM:** Mortgage providers do not know. Has there ever been any kind of legal challenge on this? In practice, how does it work or how can it work?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** In practice, there have been legal challenges and those are reasonably well documented, but nothing like as many as you would expect. There are certain cases you can look at and I am very happy to make those available from the public domain.

**Tom Copley AM:** OK. What are the answers, then? It is a difficult question.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Essentially, there are several aspects. Again, I said there is no silver bullet --

**Tom Copley AM:** Yes. What are the answers, plural?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** One aspect is that there is always the capacity to transfer risk in response by paying a cost such as insurance. Environmental insurance is a little complicated. It is a specialist market and it is, again, highly confused. If you look at a general policy like a fire protection policy, if you look at a public liability policy or if you look at a property policy, you will see in there that there is a clause that says that the insurer usually will insure for sudden and accidental pollution. Most people including statutory authorities take the position that if this person is not the polluter, in which case there is a clear attachment of liability, then in fact it would be sudden and accidental and that therefore, if they cannot bear it in the case of remediation, then the policy would pick it up. That is wrong. Environmental insurance started in [the United States of] America under a different legislative codicil and a different regime under the Superfund or Comprehensive Environmental Response, Compensation and Liability Act 1980 (CERCLA) legislation. In fact, what happened when CERCLA was brought in was that an awful lot of insurers were burned because, under the general policies that existed in America at that time, pollution was not excluded. When the pollution cases were brought under joint and several liability in America on places like Love Canal and Times Square, the Government did not want to pick up the tab and it ruled that because it was not excluded it must be included. The position taken by the insurers, who were providers of insurance in this country and worldwide as well, was, "If we exclude all pollution, it is probably not going to be very commercial, and so we will create this identification of sudden and accident and unforeseen".

It would appear to be very apparent what that would be. From an insured's perspective, if I have an underground tank and it leaks, "I did not want my diesel to leak into the groundwater, there must have been a point in time when it did and, therefore, I must be insured". From the insurer's perspective, "It is a mild steel tank, it is underground, the water table is at one metre across, it was filled, it was going to leak and so, no, it is not insured". What happened there was that there grew up a specialist environmental insurance market, which is what I was a part of and which insures just pollution risk. It just insures pollution and so it does not differentiate between gradual and incremental and sudden and accidental. That would appear to be a very good solution to have. By the way, I am not part of this market anymore and so I do not have a bias.

**Nicky Gavron AM (Chair):** Do we now have that market of specialist insurance?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** You still have it, but it is very underutilised --

**Nicky Gavron AM (Chair):** Clearly.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** -- and there is not an incentive for insurers to develop that. Insurance markets are reactive. They will respond to a market need and a market

demand. The whole essence of insurance is sharing the risks of the few amongst the many. Therefore, until a market actually gets to a certain point in volume, they cannot actually go through that point in terms of bringing the premiums down to affordable levels or, indeed, adopting a much broader-scope model that allows that insurance to be put in place in a much more process-driven model. Environmental insurance is very technically underwritten, which means that it has a high cost.

**Nicky Gavron AM (Chair):** We have to get to the nub of this now. It is there?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** It is there and it can be used to take away some of that uncertainty.

**Nicky Gavron AM (Chair):** OK. Are there other answers?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** The other aspect is with regard to the things we are going to come on to in terms of the density of land usage, particularly with regard to brownfield where you are probably not going to be able to go down the route, for all sorts of reasons, of cleaning back to absolutely clean. There are very good arguments as to where land is remediated with an engineering solution - such as leaving some of it in place like at the Olympic site and putting an engineered layer over the top - where you might want to look at that in terms of putting perhaps high-density apartments or high-density without gardens such and then for those to be leased so that there is control over the land from the surface down.

**Tom Copley AM:** Yes, and presumably in that instance the freeholder would be the one who took out the insurance?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** It could be, but the thing about insurance as well in this market, quite unusually, is that I can pay one premium as either the seller of the land or the developer, I can put in place up to a ten-year policy and I can have negotiated into the placement that that policy can be transferred in the future to a future owner of the land. That then attaches to the land in perpetuity for that ten-year period and therefore that takes it away as to whether it is the developer, which is the financially robust entity, and what happens if it disappears. It takes it away in terms of the mortgager looking at the mortgage on the individual dwelling and as to whether that dwelling owner could do anything about it if that liability appeared. It is a very underutilised resource and if we started to bring together an integrated whole with regard to planning, liability attachment, the management of the actual remediation and the valuation standards of those assets, then we could start to come to a solution.

**Tom Copley AM:** Interesting. We have talked about this for quite a while now and I am keen to bring in other guests. Does anyone want to come in on this particular issue? No? Shall I open it up? Yes.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** One small point of information I would like to make on the wider issue of contamination is that towards the end of 2014 there was a study done by Durham University on the benefits to society of remediating contaminated land, particularly for people who live near a contaminated site. That is something that the Committee may wish to look up.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** It is unthinkable that we would not develop brownfield land first whenever that is possible.



**Tom Copley AM:** Obviously, we have had now this funding for housing zones, which is a recognition that some part of the public sector needs to put something in in order to get development going. I can see Jonathan nodding. Is this a good model?

**Andrew Boff AM:** Actually, it was just that passing comment that you made there. Do you mind?

**Tom Copley AM:** No, go for it, Andrew.

**Andrew Boff AM:** You said that it is unthinkable that we would not develop a brownfield site before --

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Yes, as a priority and where it makes sense to do so, rather than greenfield land. I do not think it is the --

**Andrew Boff AM:** You have just outlined all the reasons why you really would not want to touch brownfield sites.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** No, I outlined the reasons why development of brownfield sites has not gone ahead.

**Andrew Boff AM:** After what I have heard from you, if I own two sites, one green belt and one brownfield, I would go for the green belt, would I not?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Thank you. That has proven it. That is exactly why there has not been the take-up of brownfield land, but that does not mean to say it is an unresolvable situation.

**Male Speaker:** Absolutely.

**Nicky Gavron AM (Chair):** Marcel is showing us how people are very risk-averse about this.

**Tom Copley AM:** No, it is fine, but it is the difference between the ideal world situation and the real world situation, I suppose, perhaps. I do not know.

**Andrew Boff AM:** I just do not see how you can marry that. Why would you not go for the greenfield?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** That is the position that everybody has taken.

**Tom Copley AM:** Then you would never develop brownfield and you would end up with all these undeveloped contaminated sites, which is a waste of land.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Exactly, and do you really think that a greenfield site that is next to a brownfield site is going to achieve its maximum asset value for anyone? You cannot just leave these as islands.

**Tom Copley AM:** I am keen to bring in Jonathan on the issue of housing zones - and anyone else who wants to come in on this - and the idea of the public sector coming in and kick-starting development and how that can work.

**Jonathan Manns (Director of Planning, Colliers International):** There is a gap and we have to try to address the gap in the funding that exists. In terms of the costs associated with the mediation, Marcel [Steward] is probably better placed but, from my clients' perspectives, it is not only the financial cost of cleaning the site but also the cost of the delay in delivering it and the perceived risk of the site as an asset.

If you can meet some of that very relaxed planning legislation - and housing zones are a good example - with the provision of infrastructure, then it is obviously a fantastic thing. Without that, to an extent, you are waiting for the market to spread in your direction to the point where the value change is such that you can make it viable.

**Tom Copley AM:** Extending the Overground to Barking Riverside, for example?

**Jonathan Manns (Director of Planning, Colliers International):** Yes. If you put the infrastructure there, you are already going part of the way to unlocking the value of the site that makes it feasible to develop. Otherwise, it is --

**Tom Copley AM:** We have kind of moved into the last question, which is about the role of the Mayor and what the Mayor can do. There is the obvious one about infrastructure and putting money in to deal with contamination. Is there anything else that anyone would like to add on the role of the Mayor?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Just on Jonathan's point, I am sorry, Jonathan, but if the asset is valued to take account of the remediation of contamination, even if that asset is zero, maybe that is the true valuation. If the liability situation is such that it was clear that having taken zero valuation of that asset my liability is transferred, there would still be a mechanism behind this --

**Jonathan Manns (Director of Planning, Colliers International):** Yes.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** In terms of what we are trying to achieve and with regard to what the Mayor can do, it is to bring together all of these entities and to work out a cohesive plan because these things are resolvable. It just needs the local authority planner to talk to the Environment Agency and to be aware of where the finances do lie and do not lie and where the liability attaches. That can be worked out and it has been successfully worked out on a number of sites.

**Nicky Gavron AM (Chair):** You are going to give us case studies, are you?

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** I can.

**Tom Copley AM:** That would be very, very helpful.

**Nicky Gavron AM (Chair):** That would be very good. All right.

**Tom Copley AM:** Catriona wanted to add something.

**Nicky Gavron AM (Chair):** Yes. Did Alison [Young], too?

**Catriona Riddell (Director, Catriona Riddell Associates):** It is just a very small point and Alison probably will know more from a London borough perspective. However, you have to look at this within how local authorities deliver through the local plan system. We are supposed to have a plan-led system and, in theory, we have a plan-led system. Yes, local authorities tend to be risk-averse. However, they also have to have a plan that is viable. Whole-plan viability is absolutely key. It is a really big test for local authorities when they go through examination. They have to have a flexible supply of land and they have to demonstrate to inspectors that they are not putting all their eggs in one basket, that they have enough to deliver a five-year land supply and that they have this trajectory. They cannot focus on just one massive brownfield site. They have to have that flexible supply to show that they can deliver other sites. They have to have that flexibility to say, "If this site further down the road because it is contaminated does not come forward, we have a whole load of other options to deliver the housing and other land that we need". We have the NPPF, which is almost saying, "Brownfields first", but is not providing local authorities with a planning system that helps to deliver that. That applies to London as the rest of the country.

**Steve O'Connell AM (Deputy Chair):** That is fine in principle, but for local authorities with the increased targets they have, it is a luxury they do not have anyway. It is a nice principle, but they are struggling to meet it even with what they have.

**Catriona Riddell (Director, Catriona Riddell Associates):** Absolutely. That is the point I am making. They have to look at the plan-led system that they are required to deliver through and to have a plan in place that delivers the housing that they need in a viable way. I am saying things like, "Brownfield first", and what they are trying to do often runs against that. Therefore, it is local authorities. Yes, they tend to be risk-averse for obvious reasons, but there is a whole load of other reasons why they are actually using greenfield sites instead of brownfield sites or not trying their hardest to deliver the brownfield sites that are the most difficult and will take the longest time to deliver at the end of the day.

**Tom Copley AM:** Alison?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** I was just going to say that that is absolutely right, but also obviously local authorities work in a context of being facilitators. I understand the 'risk-averse' comment, but recently local authorities have been much more focused on delivery. Therefore, they work hand-in-glove between a local plan that sets the parameters for accommodating growth and population growth generally, but also being able to partner and use their own assets creatively to make things happen at a micro-level, almost.

One of the things I was going to say is that you only have to drive around the North Circular or the South Circular to view what is technically the Green Belt. It is indistinguishable, often, from brownfield sites. I can name countless sites that you just would not believe were in the Green Belt. That is --

**Tom Copley AM:** That is coming into a question that we are going to have later and so it is probably best if you think that up on the last question.

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Fine.

**Tom Copley AM:** Does anyone else have anything they want to say on this very quickly? We have been on this for a while.

**Noel Farrer (President, Landscape Institute):** I would just like to say that what Dr Steward is trying to do, it seems to me, is to show that what seems to be grey and very complex legal area actually can be interrogated. There are answers. By understanding the answers and having clarity, it reduces risk. The notion here is that whatever the complexity in terms of the message - and I found that very intriguing - the reality is that by getting to the bottom of that, the Mayor's role is about providing advice and informing local authorities about just exactly how they can be better informed about understanding what these problems are and passing that on. That must help the release, the confidence and therefore the increased desirability of those sites for development.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Thank you, Noel. That was exactly that the comment I was going to make. Surely there is a role for the London Mayor here to provide a central resource for that expertise and knowledge and to take it away from the already pressed resources of the local authorities.

**Tom Copley AM:** Thank you all very much. I found that very interesting.

**Nicky Gavron AM (Chair):** It was very helpful. One of the things to hang on to is that the environmental insurance market could be a larger and more proactive market.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Very much so.

**Nicky Gavron AM (Chair):** Yes. We need to talk to the Mayor about that and the City.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** That could be a win for London as well because these are very rare resources and most of the world is actually written out of London.

**Nicky Gavron AM (Chair):** Yes. There was another point that may have not quite been highlighted. What happens to the communities around contaminated sites and what risks are there to them that can be dealt with by dealing with the contaminated sites? It does say in our briefing - and I am going to ask Paul this - that London compared with the rest of the country does not have very many, fortunately, what are called 'hard-core' brownfield sites. I suppose 'hard-core' means very contaminated?

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** The definition that we used, which is generally accepted, is that hard-core sites have been on the National Land Use Database for an extended period of time, five years or more. It is in the report. We can come back to the Committee on that. They are long-term sites that have not been redeveloped. As the Chair was pointing out, it is probably less of a problem in London than elsewhere because the picture here is more encouraging than in many other parts of the country because we have the GLA and we had the London Development Agency (LDA) before that, which have been able to get to grips with these sites. In some of the northern regions, they have not had this wider co-ordination and pooling of expertise that has enabled these sites to be dealt with.

**Nicky Gavron AM (Chair):** That was helpful. Also, what you are pointing out is that hard-core does not necessarily mean contaminated at all. It could just be that there has not been any infrastructure or they have been land-banked or God knows what.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** Exactly.

**Nicky Gavron AM (Chair):** It could be anything. On the LDA point, it is worth telling everyone - although I cannot list the sites and I should be able to - that when it was first set up in 2000, the LDA initially set out to buy land that was contaminated and remediated. It came under quite a lot of flak as a policy because people said, "Why do you not take the easier brownfield sites? Why take the most difficult?" However, a lot of the land has already been remediated that we are now building on or are going to build on.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** A lot of that remediation is out of date.

**Nicky Gavron AM (Chair):** They are out of date? OK.

**Dr Marcel Steward (Environmental Risk and Insurance Consultant):** Nicky, there is another point there in terms of the issue of the capacity of brownfield land. There are none so blind as those who will not see. There is a belief throughout, I would say, both local authorities and people who want to develop land that, "It is in the middle of a city. It is not contaminated. Why do we even want to open that can of worms?" However, in actual fact it may well have been contaminated from past uses going back beyond Victorian times and that contamination is still present. It may have, indeed, been landfill by waste from industrial purposes, which is quite a common practice. There has to be a much more open assessment of what is contaminated or brownfield land, whichever way you choose to combine that.

**Nicky Gavron AM (Chair):** OK. Thank you for that. It may be true of aspects of the Green Belt, too, I suppose.

**Noel Farrer (President, Landscape Institute):** Can I just say one thing? I was in the House of Commons yesterday talking to the Housing Minister as part of the new design panel. This came up talking about Ebbsfleet. One of the issues around Ebbsfleet is of course that it is a hugely contaminated site and there is no question that some of the largest entities - and I will keep names out of it - and the owners of those sites have gone in there with an aspiration and having planning to build - one of them has over 6,500 homes - on that site. Yet they are stymied. They have reached a point where they realise that the value of the land they have is actually zero and that they have expended an enormous amount of money on it. They realise that they are simply not going to get a return and so it has ground entirely to a halt. One of the solutions was that the site should be bought by the Homes and Communities Agency (HCA) for £1 and then the HCA would perhaps be in a position to realise the value of that site over 15 or 20 years, working very carefully on that site.

Therefore, there needs to be a mechanic in some way of being able to get some of that value back to the seller to help them go to their board and to help them go to their shareholders and say, "We are prepared to do this". Until that point comes, the thing is stuck solid. There are huge issues around these types of sites, exactly around what Dr Steward is talking about, which are about unlocking those sites. There is no question about that. Ebbsfleet is being stymied by that.

**Nicky Gavron AM (Chair):** Thank you. We could go on in this area and it might come up later, but we should move on to our third area of questioning, which is around suburban intensification.

**Navin Shah AM:** In the context of outer London covering some 80% of the land area and indeed accommodating 61% of London's housing stock, there is a broad question I would like to put the panel. Maybe, Alison, you might want to start with the responses. What is, in that context, the potential for suburban intensification? We will come to some of the detailed aspects and the nitty-gritty of it.

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Perhaps I can introduce John to answer some of that. However, one broad issue just to head it up is obviously the local political views on what a typical suburban landscape is and how one introduces dense development - maybe flatted development - within that and how it is going to be viewed generally by people who have issues with character areas, traditional streetscapes, etc. That is one issue that we deal with on a daily basis. John, did you want to say something about that?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** Yes. Across Redbridge, there is a variety of character. Ilford South, for example, is a very dense urban area in the west of the borough. Wanstead and Woodford are fairly suburban, quite leafy and very highly cherished.

As part of the local planning process quite recently, just before Christmas we put out a consultation to see whether there were alternatives to the preferred option that we were pursuing, which included the Green Belt release, which we will come to later. We did a consultation cross-borough and we have received 2,500 objections from people objecting a north-south corridor essentially trying to intensify the western side of the borough. It was focused around Central line stations particularly and was a corridor where the densities would be increased considerably in order to get the kinds of numbers we were looking for. It attracted such a violent public reaction because these areas are very highly valued in terms of character and the conservation areas. Density is fairly moderate.

There was a point that we put to the Further Alterations to the London Plan inspector that there is an issue in filling the gap that the Mayor faces - the 42,000 to 49,000 gap - because he has advocated that one of the solutions would be intensification. We have pretty much exhausted that avenue. We have identified 200 brownfield sites. We cannot get the numbers. The consequence of intensification in a leafy outer London suburb is very severe. The inspector actually picked that up and said that that option was going to be very difficult. Therefore, this is something we have to reconsider again shortly, but it would be very, very difficult to pursue that.

There are other problems linked with it, particularly trying to assemble land and build up areas to create reasonable development sites on a holistic basis. We have had examples where we have not had policies that could defend the removal of, say, Victorian housing in a Victorian street piecemeal and gradually getting erosion of character with flats replacing Victorian villas, say. These are things which are just not received very well either politically or by local residents.

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Just as an adjunct to that, obviously that type of infill development happens and we consent it. However, in terms of growing sustainable communities it is really difficult because you are intensifying but the ensuing infrastructure that you need around it is quite fixed. Your schools are there. There are not an awful lot of places you can go to. Can you expand on existing school sites? We have literally hundreds of school extensions planned because we have massive population growth anyway and our schools are very good and very popular and they are an attractor in themselves. People come into Redbridge because they want to access the educational opportunities. It is a beast that is almost out of control.

Those types of intensification areas where they are multiple but on a smallish scale do impact very, very severely on social infrastructure. It is difficult to actually lever in the amount of resource that you need to support that population, as anyone who has ever tried to get a doctor's appointment in London will probably verify. You cannot even get someone to answer the phone, let alone see someone. It is that kind of practical problem. That experience is fuelling getting 2,000 objections. People are really worried about whether they are going to have a life at all. With what they have to deal with at the moment, they perceive that we are loading more and more in on them in suburbia.

**Navin Shah AM:** Is the perception from the community's viewpoint also linked with high-density intensification meaning tall buildings and therefore an adverse impact on character, congestion and all of that? Does that play a major part as well, losing the suburban character and so on?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Yes, it does. Our tall buildings are largely restricted to particular town centre areas such as Ilford. We are pursuing a housing zone within Ilford and that has a good opportunity to have a different type of offer for people: high-density living, very high public transport accessibility level (PTAL) ratings, very sustainable. That will work.

The difficulty we have is with places, as John [Pearce] said, along the Central line - Woodford, South Woodford, Wanstead - where you have turn-of-the-century housing typologies and open space and then you get flatted development within that. People are quite hostile to that. They are not particularly tall buildings and they are medium-rise, but they are quite different to the normal pattern of the streetscape. Obviously, we have a very articulate bunch of residents.

**Navin Shah AM:** Yes. Broadly speaking, is there a political will to intensify and achieve this sort of growth in terms of housing as well as economic, etc, regeneration that is required?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Definitely, that is why we are pursuing the housing zone in Ilford. The reality is that it will probably be a mixture of different solutions. We are looking at de-designation of some significant Green Belt sites that are - the point is - not fulfilling the proper purpose of the Green Belt. We are not advocating necessarily going into the Green Belt proper, as I would call it, but there are lots of sites where their role is compromised because of development around them or they are contaminated and they are bits and pieces that have been left over. Therefore, looking forward, we would definitely welcome a London-wide review of the Green Belt. John can tell you a little bit more about what we have done to review our Green Belt issues.

**Navin Shah AM:** Is there strong opposition from the local community to developing on Green Belt sites? Is that also a major factor?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** There is opposition, but we have offered a variety of options. Intensification along the Central line was one of them and de-designation of some major Green Belt sites was another. People can see the pros and cons of both of those. Although there is opposition from people who live very near to the proposed de-designation sites, broadly, borough-wide, I would say people think that that is a better and more sustainable solution because you can grow a community over time and provide the social infrastructure. We are talking about places that are near to Tube stations and so there are Green Belt sites that --

**Nicky Gavron AM (Chair):** Can you say which Tube stations?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Fairlop, which is highly underused, actually.

**Nicky Gavron AM (Chair):** I think so.

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Yes, given you have not heard of it! It is a good one if you are ever playing Mornington Crescent.

Yes, they are sustainable. In a way, you could say they are perfect in that they are near good transport infrastructure but no longer fulfil the requirements of the Green Belt. This has been a microcosm, if you like, of the London-wide debate. Do you hang things in small intensive developments off a Tube line or do you try to develop something that is maybe more planned and is able to introduce open space, sporting facilities, schools and housing together as one integrated development? We have the opportunity to do that.

**Steve O'Connell AM (Deputy Chair):** Navin [Shah AM], can I just come in? Alison, your borough is an example because now you are talking about practicalities. The Green Belt, as I say from a political point of view, is inviolable. From a political point of view, I am here locally and also here to protect the Green Belt and at any given time I am part of the problem because as a local councillor at any given time I am going to be objecting to something in my ward. I am a typical example of the political guys that you are up against. You can take the view that the Green Belt is not to be touched and you can have an issue with suburbs where there is strong local opposition. I have seen suburbs that have been outside London, actually - places like Caterham in Surrey - that have been changed completely by a rather weak council. The whole character of that area has been changed and there has been no suitable infrastructure investment. You talked about schools, hospitals and doctors, big urban sprawl, over-intensification and no doctor. It causes a problem.

If you take the view that you are not going to build on the Green Belt and you are not going to build on back gardens in the suburbs, then you turn to your town centres. That is what Croydon has done, largely. Croydon is going to build with the Mayor's consent - and it is a housing growth zone - higher density in the centre of town and to build up. It has that luxury. If you do not have that luxury, you have a problem. You have to squeeze. That is the issue that you have. I would be interested in some colleagues' thoughts about that. If you have a housing target and you are looking at the suburbs and looking at the Green Belt and then looking at brownfield that may have an issue, it is a hard choice. Where are those boroughs going to go? Catriona [Riddell], do you have any thoughts on that?

**Nicky Gavron AM (Chair):** Also, we might park --

**Steve O'Connell AM (Deputy Chair):** We have gone to the local example, but you can see the real issues that somewhere like Redbridge and many other boroughs have.

**Andrew Boff AM:** There is no reason why we cannot adjust the order.

**Nicky Gavron AM (Chair):** Yes. It is good if we open this up, but Alison [Young] said something about those bits of the Green Belt that are not fit to be Green Belt. I would like us to look at that under the Green Belt section at the end.



**Steve O’Connell AM (Deputy Chair):** Good. That is fine, yes. I just wanted to make the point. We have a really good practical example. I am sure Redbridge do not wake up in the morning and say they want to be in the Green Belt and the council of Redbridge probably woke up one morning and said, “We do not want to be in the Green Belt”, but they feel it has been squeezed. Your options are squeezed such that you are having to consider Green Belt build, which is politically high-risk.

**Navin Shah AM:** Yes, Steve and Chair. Before we open this up to the rest of the expert panel members, I just want to ask you a couple of questions related to your experience and your work. You are not part of any new designated intensification or opportunity area, are you?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Ilford is, yes.

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** Ilford Town Centre.

**Navin Shah AM:** OK, yes. How are you dealing with the whole typology in terms of the various range of housing accommodation, particularly family dwellings? Obviously, people have views about that as well and I guess what we as politicians or the local authority might want to pursue.

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Yes. We are keen to explore different typologies. In previous areas that I have worked in, we have looked at having a different type of model for flatted development that maybe has different configurations of rooms that forms a bit more privacy for people if they want to study or whatever and large, flat footprints. We have explored those. However, the thing there is that you have more flexibility to do that when you are working in partnership and, again, it is probably more the regeneration arm or utilising our own assets. We are fortunate in that we as a Council have more than 40 major sites in our ownership and we are seeking to develop those in partnership and to make sure that we obviously deliver against our housing targets but also regenerate the borough and get sustainable income for the Council. It is in those areas where we have more flexibility and we can push the boundaries a bit more in terms of roof gardens and suchlike. We could get maybe a more family-friendly dwelling profile, if you like, in taller buildings, for instance.

**Nicky Gavron AM (Chair):** I want to bring in Philipp Rode on the housing typology and on suburban intensification but, Alison, you have just said and we have just heard how pressured you are and you are now telling us you have 40 regeneration sites. Are these on the Green Belt or separate from it?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** They include the sites we are proposing.

**Nicky Gavron AM (Chair):** They are designated?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** They are included in those 40 sites, but we have already taken those into account in terms of what we can achieve through our housing target. They are taken already, if you like, in terms of account.

**Nicky Gavron AM (Chair):** How many hectares do you have in regeneration sites?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** That is a very good question. I am not sure. I cannot remember the number.

**Nicky Gavron AM (Chair):** All right. Just quickly, what proportion is Green Belt and what proportion is not?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** There are three major Green Belt sites, are there not?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** Yes. For the Green Belt, the proposal for release is 187 hectares. That is not necessarily all to be developed. Some of it is already developed. I cannot tell you what the total brownfield area is in addition to that.

**Navin Shah AM:** Chair, it will be useful if we can have those figures both in terms of land area, allocation, both Green Belt and brownfield, as well as what is being proposed in terms of number of units and typology as well. If we can have that, we can follow up and so it will be very helpful.

**Nicky Gavron AM (Chair):** It would be good to know your heights. Can you just say? You say some are quite tall. How tall?

**Navin Shah AM:** How tall, yes?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** I previously worked in Lambeth and that was tall. The units we are considering in the town centre are 13 or 14 storeys. They are not major towers, but they are tall by Redbridge standards, believe me.

**Nicky Gavron AM (Chair):** That is pretty tall by any standard. On your regeneration sites, how tall are they there?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** They are influenced by where they are. Some of them are going to be low-rise or medium-rise because of the surrounding townscape.

**Nicky Gavron AM (Chair):** What is medium-rise for you?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** Ten storeys.

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Yes, ten storeys.

**Nicky Gavron AM (Chair):** Ten? OK. Navin, could we bring in Philipp Rode?

**Navin Shah AM:** Yes, sure. Just one very, very last question. Do you have within your design guidance any particular height indication or any restriction on heights, given what you have just mentioned?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** It is guidance that we have in the area action plan for Ilford --

**Navin Shah AM:** It does actually specify the acceptable heights?

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Yes.

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** It is thirty-storey plus at Ilford Town Centre.

**Navin Shah AM:** Thank you. Philipp, sorry, would you like to come in?

**Philipp Rode (Executive Director, LSE Cities):** Thank you very much. My comments are going to be somewhat from the perspective of an observer. I am going to also provide a few international comparisons. I have not worked in detail under the British planning system.

For me, a lot of the discussion I witness about housing location is often code for 'housing typology' and it is important to appreciate that a bit more. What I mean by this is that we make certain assumptions of what is possible when we are talking about brownfield, greenfield and intensification and we make assumptions about the need for that type of housing and to what extent it is desirable or not. Overall, while that code exists, I am always left with the impression that the actual qualitative dimension of this big housing demand, which we are able to very much quantify with an absolute number, is not very well understood. One point was already made about the level of affordability that is actually needed. What is often not understood is therefore the typological consequence of affordability - square metres, how you produce it, more cost-efficient or less cost-efficient - something that is often entirely disregarded. Of course, specifically for London, demographic change, the aging society, the needs of modern families - and I stress 'modern' - I rarely see. There is international migration and cultural size change. There have been dramatic changes over the last 20 or 30 years in the composition of households.

Then there is always this question about the real preference of the current Londoners and the future Londoners. On the one hand, we hear that everyone wants a house plus a garden. There is a big question mark. I know these surveys and how they work. They work in isolation. They do not ask about the trade-offs. We have just recently finished some work on a comparative study across the metropolitan region where almost half of people want to live within the city. However that is defined for them. However, this is something where they accept the certain trade-offs you have. Let me use the example of family housing, where I think the point I am going to make is maybe most clear. Families need houses. That is the very basic assumption in this country. It is very much rooted, maybe, in its particular histories, but it does miss out a few important points. Let us just think about the wider housing qualities families need.

There is generous internal living space. That comes back to the affordability. How can you actually produce square metres at cost efficiency, thinking not only about the cost to the individual but the cost to the community? Then there are quality schools, kindergartens and related amenities, easy access to healthcare, childcare, retail, leisure and nature, and safe streets. Then there is something which is never discussed: short commuting for parents. They want to spend time with their children. How about a dual-income household where both work? They want to have other families close by, access to parks, good air quality and access to nature. Then there comes the private garden. I would argue it is only the last that shifts the debate in favour of the house with a garden. Everything else is either debateable or actually swings the pendulum very much towards far more compact urban characteristics. Other countries have been amazingly successful with different types of urban family housing. Take the Berlin blocks, if you know Berlin. Their high-density, inner-

city neighbourhoods exceed the maximum density we have here in London in terms of housing. That is where the families live with generous public space and low-volume traffic because people do not need to use their cars. The streets are actually safer than many suburban streets. They have semi-public internal courtyards where parents can overlook what their children are doing, not by themselves locked in a private garden with a private swing, no, but with 20 other kids. It is very enjoyable.

It is also possible in new build. Copenhagen's Ørestad combines the logic of high-density living at the edge of the city. It combines urban living with access to nature. Yes, that is the trade-off that we may have if we are building in the inner city for families. Where do we see these hard edges in London where we have really high density, compact development and the cows behind it? It is an incredibly attractive offer for families. Have a look at the Ørestad development.

In the long run, Greater London and the southeast may actually have a different type of challenge, which is the housing stock that is no longer fit for the market and the demand. It is the housing stock that is related to the house typology. In Greater London, 50% is houses. In the southeast, 70% is houses. These are ratios far greater than many European countries as a total have for these house typologies. There is more I want to share maybe at a later stage, but let us just remind ourselves. What is the problem with the house typology? Either we are not going to go beyond a floor area ratio of one and so have a severe limitation on density, or we accept overcrowding, which we do not want. We are just not able to introduce mixed-use at the building level. Yes, we can have high streets, but not mixed-use at the building level. Both are very serious limitations to what certainly internationally modern families are increasingly demanding.

**Andrew Boff AM:** Can I just ask a question on that? What is your evidence for modern families demanding that?

**Philipp Rode (Executive Director, LSE Cities):** We have one example in the Continental European context where Germany has --

**Andrew Boff AM:** What about United Kingdom (UK) families demanding that? This is about what people want, not what planners hypothecate. Surely this is about what people aspire to and want, not what people plan for.

**Philipp Rode (Executive Director, LSE Cities):** OK. Let me make my point again. It is a trade-off of multiple dimensions. If you only ask the question whether you want to live in a house with a garden, yes, ideally, in the centre of London --

**Andrew Boff AM:** As many do.

**Philipp Rode (Executive Director, LSE Cities):** As many do, yes.

**Andrew Boff AM:** Many, many do live in central London in a house with a garden.

**Philipp Rode (Executive Director, LSE Cities):** Yes, but there is a trade-off. That is what I am trying to tell you. At the same time, we do appreciate going to Tesco at 11.00pm with a five-minute walk. In a way, it is the 'five-minute walk' question. How many families do appreciate a five-minute reaching all the things they need? We all live in the topology I outlined, a house-based typology. It is impossible to cater for that need.

**Navin Shah AM:** Do you not also agree --

**Andrew Boff AM:** It is not impossible; it happens.

**Philipp Rode (Executive Director, LSE Cities):** No, the five-minute walking distance, if you build suburban - we have done endless studies on London - but if you --

**Nicky Gavron AM (Chair):** That is suburbs.

**Andrew Boff AM:** On suburbs? Sorry, suburbs.

**Philipp Rode (Executive Director, LSE Cities):** -- live in a house with a garden and you scale that --

**Andrew Boff AM:** Sorry, I thought you were talking about inner London.

**Navin Shah AM:** Do you agree that there is enough historical as well as contemporary evidence that you can have a high-density development without going high and still achieve what local communities aspire for, which is a low-rise unit with a garden of your own, and still have high densities? I would quite like to know what density levels are in those cities that you mention, for example, Berlin and Copenhagen.

**Philipp Rode (Executive Director, LSE Cities):** They have 300 or 400 dwellings per hectare.

**Navin Shah AM:** Yes, but it is a question of how do we actually fulfil the growth requirement without diminishing entirely the values that communities hold, which are very vital. You do not want to destroy --

**Philipp Rode (Executive Director, LSE Cities):** Can I respond to that question? It is very important to clarify this is not an advocacy for high rise. We are talking about medium rise, high density, five-storey, but what I am talking about --

**Nicky Gavron AM (Chair):** It is five-storey? What you are talking about?

**Philipp Rode (Executive Director, LSE Cities):** For example, the Berlin block is five-storey. What I am talking about is apartments, generous, big apartments, high ceilings, high quality with a rooftop, with large balconies. Yes, the one compromise you have to make in these typologies is your personal and private garden. My argument is and the future will show that maybe the growth of the kind of modern families London is growing at the moment may no longer have exactly the same sort of trade-off attitudes for desiring this garden so much that they are not willing to look into other high-quality housing typologies where you get the benefits of the commuting, the benefit of accessibility, the benefit of proximity to other families and a more semi-public environment for your children to be brought up.

**Nicky Gavron AM (Chair):** Are we designing them?

**Philipp Rode (Executive Director, LSE Cities):** We have a few examples. They are probably not yet again, in an international comparison, up to the standard of what we are seeing in the Netherlands, Scandinavia and other parts of Continental Europe, but if you go to new family developments in Hackney along the canal, you can see the perimeter block developments there. Some of them have been granted awards for that design approach. Take the development just on Queensbridge Road and the canal. There is one famous --

**Andrew Boff AM:** Yes, the one that is completely socially exclusive and has no social housing.

**Philipp Rode (Executive Director, LSE Cities):** No, it has 50% social housing units.

**Andrew Boff AM:** Which one?

**Philipp Rode (Executive Director, LSE Cities):** I can give you the name.

**Andrew Boff AM:** Yes, I would like to see that.

**Philipp Rode (Executive Director, LSE Cities):** There are a few more. There is the whole redevelopment of the former estate housing in Haggerston, the perimeter block, with more than 50% social housing. This also relates back to the costing point I made. I just cannot believe that affordability is higher per square metre interior space in these low-density formations.

What I wanted to say is that the Olympic Village, which came up before, is probably a very high-density, high-end interpretation of it. Its design quality unfortunately is probably not up to that standard, but the logic of creating big public space threshold densities is certainly there and it will be interesting to watch how attractive it is going to become.

**Andrew Boff AM:** I get what you are saying. I am trying to think which development you are thinking about because there have been a few down Queensbridge Road, but the one you are talking about, also as a part of that development, the reason it is so good is that it actually does include some low-rise family houses with gardens --

**Philipp Rode (Executive Director, LSE Cities):** There are different examples and some of them do it.

**Andrew Boff AM:** Yes, there are a number of developments down that road.

**Philipp Rode (Executive Director, LSE Cities):** Of course typological mix has an advantage to a degree, but this insistence and also this idea that we lack in London housing typology with a garden to me, quite frankly, is absurd. If I am flying into London and I look outside at what is already there in the city, it feels like there is more than enough of this stuff. Maybe we are not using it for the right people, that might well be, and this could be something which I have not seen studies on and a more detailed understanding is lacking. However, it puzzles me that we are still saying we do not have enough of this garden house arrangement. That is just my --

**Tom Copley AM:** One of the problems is that you have these houses with gardens and a lot of the time there will be an elderly couple there living in a four-bedroom house - and actually this is a different issue - but what we need is more properties for those people to move into to free up the stock and make it more efficient.

**Andrew Boff AM:** Not making it compulsory.

**Tom Copley AM:** Not compulsory.

**Andrew Boff AM:** No.

**Tom Copley AM:** No, more optional --

**Nicky Gavron AM (Chair):** Can I just put into the pot that one of the - it is in the Mayor's Infrastructure Plan, which goes to 2050 - ideas put forward and it came out of a report from, no, I do not think a representative on this Committee actually, though there are reports from representatives of organisations on this Committee. It was a report saying that 10% - this is not rubbing out suburbs in any way - of suburban homes which are semidetached, looking at parts of roads, I guess, in some areas, but if they were just doubled in density - and these are places, semidetached with big gardens - then you would create nearly 500,000 homes.

**Jonathan Manns (Director of Planning, Colliers International):** Not to cut in, that was the *Superbia* study, which the GLA and HTA designed together. It is a great idea, but invariably the collection of land ownerships would be one issue there and then perceptions and people throwing in their own little properties. If you can deliver it, it is great.

**Nicky Gavron AM (Chair):** Sure. I just want to throw it out to our international expert and ask what you would do because of course there is massive controversy if you try to do that.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** Thanks very much. The Committee has made a number of very good points and I just want to start off with a few points of information to them. In terms of good practice, I am sure Members of the Committee will also be aware of the Beddington Zero Energy Development (BedZED) in Beddington, for example --

**Steve O'Connell AM (Deputy Chair):** My constituency.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** -- and also Coin Street near Waterloo as well, which I believe have a good mix of social housing and corporate housing as well as housing for the market. We would commend those as examples of how you can do high-density work.

**Steve O'Connell AM (Deputy Chair):** Can I just say, they have gardens. Those properties have gardens, on the roof, but they have gardens.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** Yes, it can be done.

**Nicky Gavron AM (Chair):** Can we ask Philipp though how he would deal with that 10% of the densification? You just heard from Jonathan [Manns].

**Philipp Rode (Executive Director, LSE Cities):** OK. Again, as the outside observer, I completely recognise all the difficulties you must be facing. It comes close potentially to political suicide, proposing that under the current arrangements. Since we are talking about a very long-term perspective here and where we are heading in the long run, the first thing that I guess needs to really change is a narrative and an understanding: are we having housing stock in London which is not fit for purpose and fit for the future? If one establishes a political narrative around this and then one is serious about providing the incentives that is needed for people to accept change in their communities, we might have a different conversation.

I am always struck with regards to the change that seems to be possible in some inner London boroughs, Hackney being a good example, where the opposition to densification exists but is somehow mitigated and maybe there is an attitude which also respects the advantages of the additional neighbour next door, the buses running more frequently, there is another health centre and schools massively upgraded. There need to be these trade-offs. As long as it is only seen as a loss, it is never going to work.

The question is at what point in suburbia will there be a moment where urbanity is again more appreciated? Maybe it is to do with ageing populations where, yes, you are being more reliant on what you can reach just simply by walking, having access to friends and families, having access to those who care for you and having simple care at home. Maybe that is going to change the dynamics.

**Alison Young (Chief Planning and Regeneration Officer, London Borough of Redbridge):** Just to note, it is fascinating, what you are saying, having worked in another London borough where we were pursuing a growth agenda but frankly the decision-makers were of a generation where they could not conceive of people wanting to live in that way. They could not believe that we want to provide zero car parking and they were wedded to their car and so the two worlds were colliding and this is really generational change. We have obviously the land use and the patterns that we have in London which no one can dig up and remove; eventually over time, they will be renewed, but particularly if you are looking at a standard planning committee, those decision-makers are going to be looking at some of these proposals and thinking, "I do not recognise this lifestyle. I do not recognise these cultural values. Why you want to be boxed in? Why would you not want your car in your carport?"

We have to go so far in describing different ways of living and getting better examples coming forward, because some of the examples are valid, but they are either experimental or award-winning, which usually in this country means, "Oh, my God". I am not wishing to be facetious, but there is usually a liability attached to some of that. They need to be mainstreamed much more and recognisable to what are normal, if you like, cultural values.

**Steve O'Connell AM (Deputy Chair):** Aspiration, what people aspire to. Just quickly on affordable housing, nothing irritates me more than the assumption that affordable housing people do not have cars and would quite happily be boxed up with no car and no garden. That is the socialist in me coming out. It irritates me immensely that there is, "We will put that high, that high, with no garden and it will not have a car and that is fine". That is a wrong point of principle. OK, if it is right next to East Croydon Station, then that might be kind of fine because you have perfect transport and things.

**Nicky Gavron AM (Chair):** I feel, panel, a site visit coming on. What we should do is we should go and look perhaps at this block that Philipp [Rode] is talking about in Hackney and maybe we can look at --

**Andrew Boff AM:** I want to know which one it is.

**Nicky Gavron AM (Chair):** -- what regeneration means in Hackney because we are going to be looking at estate regeneration from the planning point of view later in the year and the Housing Committee has looked at from their point of view. I would like us to look at from the design point of view.

**Andrew Boff AM:** Chair, we have not talked about this. We have just talked about parking in suburbia and the intensification. I moved on to Barking Riverside and what is the big issue? They did not put in enough parking places. That is the most modern of the regeneration areas and we get it wrong.



**Noel Farrer (President, Landscape Institute):** This is not new. London has been absolutely the vanguard of a transformation if you go back 30 years of reinventing inner-city living. Gone are the days where quite so many people are steaming in from Surrey to come into the city. Clerkenwell, all of these places in the middle of London, is now a perfectly good example of highly-desirable properties at the right levels of density desirable to families and to anyone who wants to live there. The whole notion that this urban identity --

**Steve O'Connell AM (Deputy Chair):** No one can afford to live there. That is the problem.

**Noel Farrer (President, Landscape Institute):** No, I accept that, but it shows that the typology is not wrong and that those places can work for the people, who are also people having real choices. They are choosing to live there more and more.

The other thing I want to say is the other example that is not new. There are people who are very, very happy to live in high density in Peabody Flats in the middle of London built in 1880. As affordable housing, I have worked on many on those estates and have known that there are four generations of families who have lived in those apartments without a private garden, working around a courtyard space and have been perfectly happy. They are completely compelling ways of living and I would recommend you go and visit those.

**Tom Copley AM:** London County Council blocks, the old 1920s, 1930s, yes, are lovely.

**Noel Farrer (President, Landscape Institute):** There is no question for me that this is the direction. We will probably be touching on this later, but we will look at the green spaces that we have which are perhaps being talked about as redundant or low-value green belt or green belt, particularly in low-density areas, look to seem to be doing nothing.

I was asked to provide a feasibility study which got the Mayor's grant some years ago looking at Burgess Park, which was dead and dangerous metropolitan open land that seemed pretty redundant until not very long ago. What has happened is as the densification of that area has increased and all of those properties over the last few years, the reality is the turning around of that space and that space starting to function effectively, ie starting to recognise that these redundant spaces have a critical role in our future city.

They are not necessary working in lower-density areas now and the odd person might walk their dog across them and everyone is wondering why they are just sitting there empty, but the reality is that is not how they should be. In the future, those are the places that will be where people play, people meet, people socialise and provide the amenity that is going to be necessary. If you take and start building on those, the opportunity for you to then be able to think about intensification on the other sites is lost because you will not be able to service them, because you have built on the thing that gives you the potential for the future for densifying the housing areas.

**Nicky Gavron AM (Chair):** You are overlapping with the last question on the Green Belt --

**Noel Farrer (President, Landscape Institute):** I am overlapping with the last piece.

**Nicky Gavron AM (Chair):** -- but that is well said. Thank you. Now we are getting on to the Green Belt but just before that, Andrew had a short bit of questioning on the rest of the southeast. We are coming back to this later and so we cannot do a lot on it.

**Andrew Boff AM:** We always seem to talk in London about the boundary of the GLA. I am just wondering what the experts here think about the role must be played by the rest of the southeast in meeting housing need that is not just London's housing need but is their housing need as well. What do you think should be the way in which we address that? Who was nodding? Catriona?

**Catriona Riddell (Director, Catriona Riddell Associates):** I will kick off. I think it was Marcel [Steward] who said there is not one answer to London's needs in terms of brownfield and greenfield. It has to be different packages and that applies to where you do it as well, as you say, and a lot of the evidence very strongly supported the very real relationship with - and I do not know what you call it - the London city region, the Greater South East, London and the 'rose', as we used to call it in the London and South East Regional Planning Conference (SERPLAN) days. I am not sure what the terminology is now but basically --

**Nicky Gavron AM (Chair):** London's Functional Urban Region or the Greater South East.

**Andrew Boff AM:** A good name is Thames City.

**Steve O'Connell AM (Deputy Chair):** Thames City, yes.

**Catriona Riddell (Director, Catriona Riddell Associates):** Thames City. Whatever way you look at it, the Home Counties particularly, but beyond that, have a very integral relationship with London. As well as exploring all the brownfield options and all the greenfield options and green belt options in the suburbs, it is inevitable that you have to look outside. We have seen over the last few decades that every 20 years or so there needs to be a step change and there needs to be something fairly fundamental.

Just before the regional system was abolished, we had reached that point where we knew that this was coming in terms of London's population, as well as the southeast just growing generally, and that there needed to be a step change and that the incremental approach was not going to work. There has never been a plan that proposes new towns, garden cities, whatever way you want to call it, without national intervention. I just want to put that aside because 'right to grow', proposed by the Labour Party, garden cities, the three garden cities which have already been in the pipeline for years that this Government are very keen on are tiny and they were already there as part of the previous system. We have never had a system where it has delivered that fundamental step change without national government intervention in the southeast generally and so I put that to one side.

There are different options and that is where the Mayor has proposed a summit in March, which is the beginning of a discussion with all the authorities outside the southeast. Everybody will be expected to do their bit, but it does need to move on to look at some real step change and differential spatial options around. That could be anything. It could be around Crossrail 1 and Crossrail 2, in particular Crossrail 2, I suspect, going down to Surrey and Hertfordshire and beyond. It could be a series of new towns or it could be every single part of the southeast has to do 20% more. However, there is a discussion that has to be had. That also leads into issues around governance and how the rest of the southeast relates to London and how they work together to actually consider these options, bearing in mind what I said about how it needs some national accountability here as well.

I know you cannot have a discussion about how much the southeast does without having a discussion around what the Green Belt means in the rest of the southeast. I consistently say to the local authorities around the

southeast that I work with, "This is the Metropolitan Green Belt. You should not be a position where you are looking at incremental releases of the Metropolitan Green Belt. It is a green belt there functionally to support the growth of London in a sustainable way and the rest of the southeast in a sustainable way". That has not happened and it is still the most successful planning policy we have had in this country, frankly.

Again, what Alison [Young] was saying about the political support for the Green Belt, and you may be aware of this, is just a really good measure of how important that is. In Guildford, not a million miles away from here and probably one of the areas that has the potential to really support London's growth in a sustainable way - it is a good business centre, it has a good university, very good links into London and it already has a very strong relationship with London - you have a situation there now where you have a new political party called the Guildford Green Belt Group which has been launched. It is now challenging every single seat in the local council, it is now challenging the MP in terms of this coming election and it is now challenging Mole Valley, its neighbour, right next to London, in terms of their seat.

This has arisen because Guildford took a brave decision to move forward with a local plan. They do not have a local plan - theirs is 2003 - and so they took a brave decision to start looking at big brownfield sites and some green belt. The reaction there was from a very articulate, very wealthy population, and when people say to me they do not really understand the difference between green belt and greenfield, yes, they do. They know exactly the difference. They are very well-informed around this and they know how to play the game. They first of all then challenged Guildford to change the whole system that they operate back from a cabinet system to a committee system because they did not like the fact that the cabinet was proposing this route. They now, as I said, are standing against the current councillors. This is just a tiny example of how this may filter out in terms of the debate around London's growth and the role of green belt.

There was a study a couple of weeks ago by Paul Cheshire [Professor, London School of Economics] and others around the Green Belt and one option is just to scrap it. On a very practical level they need to understand how much this valued by residents in the southeast and in London and in the suburbs. Somebody said it is political suicide. It absolutely is. If a council gets elected to stand against any development of any sort but particularly green belt, they will fight tooth and nail, and the more we have of those councillors, the harder it will be to have that dialogue with London around how the southeast supports this very serious growth. I explain it to --

**Tom Copley AM:** I bet they all live in massive houses with gardens and those are those who cannot get the (Overspeaking)

**Catriona Riddell (Director, Catriona Riddell Associates):** Actually, no, that is absolutely not true.

**Tom Copley AM:** Sorry, it just sort of sounds a bit not in my back yard (NIMBY) ish.

**Catriona Riddell (Director, Catriona Riddell Associates):** You describe it as NIMBY-ish, but I worked for Surrey County Council on the structure plan for 16 years and we did extensive consultation. Yes, there were communities within the towns that said, "We would rather you went for greenfield sites on the edge of town so that we can get more infrastructure and more affordable housing, but do not touch the Green Belt", because the Green Belt is as valuable to whether you live in a affordable house or a mansion in Surrey. It is so precious, and just the name 'Green Belt' raises all sorts of alarm bells and so you have to deal with before you decide how much the southeast is going to engage in this conversation.

**Andrew Boff AM:** Can I just say I am pleased you say that the Green Belt is the most successful planning policy that there is, and I cannot believe what Tom [Copley] said. For me, it is the people who campaign for high rise are the ones who live in a nice Georgian terrace, curiously enough, and it is not people who live in high rise who campaign for high rise.

**Philipp Rode (Executive Director, LSE Cities):** I live in high rise.

**Andrew Boff AM:** You do? You are the first one. It is a very small club. I am assuming you do not have a country house.

**Philipp Rode (Executive Director, LSE Cities):** I campaigned for it as well.

**Andrew Boff AM:** I assume you do not have a country house at the weekend. Can we just --

**Nicky Gavron AM (Chair):** You can slide into the Green Belt discussion.

**Andrew Boff AM:** Before we go on to the Green Belt, really what we were talking about was the southeast and the southeast itself has its own housing problems. Take out London. There are still housing problems there and intense housing problems. Surely those authorities that are bordering London have their own policies in order to develop housing. How would they be assisted by coming in with London for a broader view of the challenge in the southeast?

**Catriona Riddell (Director, Catriona Riddell Associates):** Can I just comment on that again? What we have asked local authorities around the southeast is a significant cultural shift. Under the previous system five years ago, the areas around London, largely because of the Green Belt but because we had growth areas in Milton Keynes and Ashford, were never expected to meet their own needs and have never been expected to meet their own needs. It was done very much on a London basis and it has been done on a capacity basis. Local authorities in Hampshire, Surrey, Buckinghamshire and Kent have done their assessments of housing needs on how much they can deliver without breaching major constraints like the Green Belt and other national designations.

What we have asked them to do in the last five years is have a totally different approach to development, where you have to start with what your needs are and you work backwards. That is where the contention has come, because that is why local authorities surrounding London or neighbouring London have then suddenly thought, "We are going to have to release quite big chunks of green belt to address this". Brandon Lewis [Minister for Housing and Planning] then comes in and responds to United Kingdom Independence Party (UKIP) saying, "No, actually, that is not what we meant. Protect your green belt, keep your green belt. It will go somewhere else".

It is always the housing is going to go somewhere else. It has not been dealt with. It is just getting further and further and it is sitting up there, this excess need in the southeast that you quite rightly say has to be delivered. Partly that is to deal with the migration of London that has already been calculated into their figures. It is not just what London cannot meet now. Local authorities around the southeast have always had to take into account a certain amount of migration from London. That is just sitting there and nobody is dealing with that, because they do not have to. We have had a huge expectation around cultural shift and how we plan the rest of the southeast that has not actually happened.

We have this huge housing need that all these local authorities have assessed, as they objectively assess housing needs, which they are either not moving with local plans to do it, and that is another really big issue because now you have got a situation - again, it comes to green belt - where you have local authorities who are sitting on the Green Belt. Mole Valley, for example, have withdrawn their local plan and said, "We are not going to do anything", and others have said, "You are going to end up planning by appeal", and they said, "No, we are not because every time we go to appeal, our sites are in the Green Belt and they lose". The housing just does not happen. They are not planning proactively, they do not have local plans in place and there is absolutely no political incentive for them to do that.

**Nicky Gavron AM (Chair):** I was on the SERPLAN. I was a London rep on SERPLAN in the 1990s. I must say it was really hard to get towns in the rest of the southeast to really look at the kind of things we have been talking about today: intensification, infill sites, brownfield sites, estate regeneration. That was just not on at the time.

**Catriona Riddell (Director, Catriona Riddell Associates):** At the structure plan level and SERPLAN days, at least we did quite extensive brownfield sites in Surrey, which then forced the districts' hands in effect to do that. You are right that there were not the same incentives around brownfield development as there are now, but there was quite a lot of work done through SERPLAN, through the counties and their structure plans to do that.

**Nicky Gavron AM (Chair):** Yes, I am not saying SERPLAN was ineffective because it is a great deal better than what we have now, but I am just saying that there was quite a lot of resistance. This was before we had the notion of brownfield first.

**Catriona Riddell (Director, Catriona Riddell Associates):** Also, there was not the same pressure on brownfield sites as well in the rest of the southeast because you had a Regional Planning Guidance (RPG) 9 growth strategy, which was around, "You do not have to build everywhere. We will focus a lot of growth in Ashford, in Milton Keynes and in other parts", and so the incentives in terms of everybody meeting their own needs and the pressure on brownfield sites was not in the same in these days as it is now.

**Nicky Gavron AM (Chair):** As a Committee, we are going to look again in much more detail at London's relationship with the rest of the southeast and look at this issue and drill down on it because it is really important and it is well overdue and so we should be doing that. Thank you very much for that contribution and of course come in on the Green Belt, too.

**Steve O'Connell AM (Deputy Chair):** We have obviously covered some of the points and we have already explored the fact that building on the Green Belt can be politically toxic. It will partly depend on the makeup of the council and its vulnerabilities whether it actually even considers it and that is a point to be made. I will declare my interest as a councillor and someone who is dead against building on the Green Belt, not just for people in big houses, but I have people in flats nearby who enjoy getting out, getting in their car and going to the North Downs and Surrey Hills nearby green belt and enjoy their Sundays. This is about a facility or an amenity for people generally, which is the point we need to make. If you start building on those, those good people will not have that amenity.

The issue is the one that you said, there is demand on housing in Redbridge and other boroughs and if you say you are not, for example, going to be building on green belt, then Redbridge are being more fluid on that, and you have an issue around gardens and you have an issue about brownfield that it is expensive to build on,

where are you going to put that housing? That is the problem that you are talking about and so they will just cut that out entirely and put it out in the ether, which you talked about, and just hope it will go away, which of course it will not.

Going back to the Green Belt, you have to revisit the Green Belt in itself and so I will ask in an academic way because I am on record as being against building on green belt. Does the green belt policy need reviewing by this Mayor or the following Mayor or by Government? Is a review due of the Green Belt? Noel [Farrer] is nodding in a quiet way and Paul [Miner] no doubt will weigh in for the rural communities. Jonathan?

**Jonathan Manns (Director of Planning, Colliers International):** That slightly misses the more fundamental question as to where and how we deliver growth, which overlaps with the point about housing need in the southeast, because the Green Belt I suppose became most popular as part of a strategy to depopulate London and to deliver new towns outside of it. I suspect that actually we cannot look at the Green Belt in isolation, and in that context, I would quite like to quickly just run through the history of the Green Belt because it is a concept which has become something to everyone.

It has actually been around for the best part of 150 years as an idea and from 1860 to the early 1920s really it was seen as a barrier of a quarter of a mile to two miles wide at the edge of London of an essentially boulevard-like connection of streets and parks to provide a finite limit to the edge of the city. It was driven forward in the 1920s by the Ministry of Health, which then had somewhat responsibility for town planning, and in the context of agricultural collapse, where people were leaving their land to just to go waste, we were not meeting our food-growing potential and requirements, and it bubbled under the surface with relatively little support at a political level through the 1920s and early 1930s.

The idea of a green belt was, however, supported by town planners, including Raymond Unwin and Barry Parker [British architects], who delivered the new towns at Letchworth, for example, and similarly Patrick Abercrombie [British town planner], who founded the Campaign to Protect Rural England. They reached a broad sense of agreement that a green belt somewhere probably between four and six miles wide should be established around London, beyond which new development would occur. That was then incorporated into the Greater London Plan, which was the first strategic plan for London in 1944, and Patrick Abercrombie at that point again went for the slightly more ambitious target of six miles from London.

The statutory ability at that point was essentially you had to purchase the land yourself following the Green Belt Act of 1938, and after the first Planning Act in 1947, you had the opportunity to designate it. The Housing Minister at that point was immensely concerned that the idea would not catch on with the general public and was quite desperately - from what I have read at least - trying to encourage people to designate their own green belt of, to his mind, some seven to ten miles deep. We are now in a position where the idea has been so incredibly popular that London's Green Belt in places extends about 35 miles out and covers an area of over 500,000 hectares.

The Green Belt, although we are talking about it in a sense where we are looking at individual sites as they may or may not cling on to the edge of London, some more sustainable or brownfields, it is actually kind of missing the bigger picture, which I believe has to come down to the question of what do we need a green belt for today, what should it look like, and if we were going to start again, would we design and designate the Green Belt as it currently exists? Everyone has their own idea of what is and is not green belt land, what its purpose is and is not.

**Andrew Boff AM:** That is going to be one of my questions to you: what will the Green Belt look like in the 21st century? What would a 21st century green belt look like --

**Jonathan Manns (Director of Planning, Colliers International):** Paul [Miner] might disagree with me, but I do not think we have a cohesive answer at this point because the defining characteristic of London's Green Belt today is simply that it has no defining characteristic. It is an area full of infrastructure, some Victorian, some more modern. There are informal uses; there is commercial agriculture; there are obviously towns and settlements that have been enveloped, including some of the new towns which we built beyond the Green Belt in the 1950s and 1960s. There is a whole menagerie of different uses, including leisure and recreation and amenity that obviously most commonly starts --

**Andrew Boff AM:** I will leap in. It is a conceptual thing to people?

**Jonathan Manns (Director of Planning, Colliers International):** It is, yes.

**Andrew Boff AM:** There will be a planning application somewhere and it will be nearby or on a bit of green and people kind of say, "Is it green belt?" That is the first question, and it normally is not. People do not have an understanding of the history of what the Green Belt was designed for.

**Jonathan Manns (Director of Planning, Colliers International):** Exactly, yes.

**Andrew Boff AM:** It has become almost something to say, "It is green. We do not want you building on it and so it is likely to be green belt".

**Jonathan Manns (Director of Planning, Colliers International):** That is what makes it such an emotive topic. To an extent that is why people perceive a sense that it is being eroded and nibbled away and there is a genuine sense of loss. The fact that we are not planning for the Green Belt, to my mind, and indeed, planning for the growth of London in the context of the southeast at a more strategic level, is part of the reason for that.

The paper that I prepared for the London Society earlier this year or the back end of last year, which set out some of the history, was intended to kick off a discussion about what London's future Green Belt and indeed the growth of London should look like. At our first event, we had people speaking for and against and dealing with some of the more typical polarised opinions that people have to express. Through the discussion, a number of comments were made from people who had come along, some of whom sit on the Green Belt Council and suchlike and have fought against the loss of green belt in their local authority areas. The comment that kept coming back was, "I would not have a problem with this if someone could tell me exactly how the city is going to grow, because if someone could say, 'This is where we are going to put another 1 million new homes in Milton Keynes, we are going to have garden cities, we are going to densify here, but in order to do this we need to lose some green belt land' then I would not have a problem with it at all. The simple fact is that it is un-coordinated and unplanned, and as a consequence, I am going to push back".

As a planning consultant, that is exactly what people say to me when we go to engage with them for some of our applications, they are saying, "You know what? It is not your scheme per se; it is what is happening in general and the way that growth and development is being delivered". That is the sort of narrative, and Philipp was talking about new narratives of typology. We need to talk about a new narrative of growth and the Green Belt and it needs to be much more joined-up and frank.

**Andrew Boff AM:** Paul [Miner] will have a view on that, no doubt, because that is one version of the truth.

**Jonathan Manns (Director of Planning, Colliers International):** Yes, of course.

**Andrew Boff AM:** I am not sure what that means. Does that mean redefining it? I am not quite sure what you mean.

**Steve O'Connell AM (Deputy Chair):** Yes, what is your subtext there --

**Tom Copley AM:** With these sort of things, you seem to be dancing around the core issue. Do you we redefine it or do we not?

**Andrew Boff AM:** The bit that you have said that sounds implausible to me is that, "It is not this application that we are concerned about; it is all the others". That is completely the reverse of what I hear when people appeal against planning, which is, "It is not about the general principle; it is the fact that you are building in my backyard".

**Tom Copley AM:** Yes, exactly, "We do not want it here".

**Andrew Boff AM:** You have just said the opposite is true.

**Jonathan Manns (Director of Planning, Colliers International):** Obviously people are going to say different things in different situations but to come back to what, Tom, you were saying --

**Tom Copley AM:** I have never heard of someone object to a planning objection over there; it is always a planning objection over here.

**Jonathan Manns (Director of Planning, Colliers International):** We are having those discussions in different contexts, though, because those responses were coming out of, "Actually, when dealing with this in a non-partisan, broad, non-specific term about how London should grow, then I am happy to talk about general principles and maybe we should let some greenfield go away. Maybe it is outdated and maybe we do need to revisit".

**Andrew Boff AM:** The Green Belt, not greenfield.

**Jonathan Manns (Director of Planning, Colliers International):** Sorry, Green Belt. I am confusing it myself. Maybe we do need to have a discussion. When you say, "It is on your back garden and where you walk the dogs and where you have watched your kids play for the last 20 years and where it is going to impact on the value of your house", then it becomes a totally different kettle of fish.

**Tom Copley AM:** I hate a cosy consensus and it is good to have the two sides of the argument.

**Nicky Gavron AM (Chair):** Could we hear from Philipp? You wanted to come in before.

**Philipp Rode (Executive Director, LSE Cities):** Just a very quick one. Jonathan, I was trying to interpret what you are saying and I was wondering if it is along the lines of, as long as there is not some serious regional



planning effort, venturing into the space of the unknown without a green belt is a very uncomfortable feeling. Like many other metropolitan regions, there needs to be a more concerted effort of metropolitan scale planning, where people have simple diagrams that explain 2020, 2030 and 2050 and in the absence of that kind of conversation, it is --

**Jonathan Manns (Director of Planning, Colliers International):** You have hit the nail on the head. That is, to my eyes, absolutely right. The Green Belt has been an immensely successful policy.

**Nicky Gavron AM (Chair):** Why, Jonathan?

**Jonathan Manns (Director of Planning, Colliers International):** It has been successful in terms of its purpose because it is designed to prevent development, essentially, and --

**Nicky Gavron AM (Chair):** Stop urban sprawl.

**Jonathan Manns (Director of Planning, Colliers International):** Yes, but it stops it by preventing new development happening. As a consequence, it is very cosy because until we have discussions about exactly where that growth is going, it restricts the ability for people to randomly sprawl in an uncontrolled, undirected way.

**Andrew Boff AM:** What you seem to be saying is what we do need is a review of it as part of a wider debate about --

**Jonathan Manns (Director of Planning, Colliers International):** As part of a Greater London Plan or --

**Andrew Boff AM:** You are saying we do need a review?

**Jonathan Manns (Director of Planning, Colliers International):** Yes, absolutely.

**Steve O'Connell AM (Deputy Chair):** Paul, I know you are going to comment on it, but any leader of any council who declares on his manifesto he will review the Green Belt will not become leader of the council.

**Jonathan Manns (Director of Planning, Colliers International):** I do not deny that.

**Steve O'Connell AM (Deputy Chair):** We are talking heads around here, but let us get practical --

**Jonathan Manns (Director of Planning, Colliers International):** Yes, you are right.

**Steve O'Connell AM (Deputy Chair):** -- which was Catriona's [Riddell] point. Paul, what about your organisation's view on it? There is quite a strong case further up the end of this table about how perhaps we should be reviewing the Green Belt and potentially building on some Green Belt as long as it is not at the bottom of my garden. Paul, tell me what your thoughts are.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** First, in terms of the green belt policy, there are a lot of misconceptions about what it does and one of them in particular is that constrains all development, which it does not. There are a wide number of categories of development that are allowed in

the Green Belt, particularly in relation to infrastructure. The best illustration of that is that the M25 motorway runs entirely through the Green Belt pretty much and that is not seen inappropriate in green belt policy terms.

We have seen a number of recent studies that have called for a wholesale review of the Green Belt or major changes to the Green Belt to accommodate development. There are two points, the latter of which follows from the former. The first is that they significantly underestimate the value of the Green Belt to society, and following on from that, they overestimate - quite considerably, in our view - the benefits of de-designating Green Belt land. In terms of the significant underestimate, what is not understood is that the Green Belt around London is more accessible to the public than the countryside as a whole. It has a higher density of public footpaths than the countryside overall. It also has a lot of nature reserves which have been allowed to emerge because there has been that certainty that they are not going to be developed in the long run. Also, the Metropolitan Green Belt is relatively high in terms of England's proportion of tree cover; about 18% of the Green Belt is woodland, which is again much higher than the overall picture for England. Also, an interesting point in relation to the Metropolitan Green Belt is that it has 10% of the nation's listed parks and gardens, even though the Metropolitan Green Belt itself only covers about 3.5% of England's land area.

The Adam Smith Institute, with Catriona [Riddell] mentioned earlier, published a report which used the figure which suggested that the value of the Green Belt to society was about £889 per hectare per year and was therefore 54 times less valuable than an open park. What they did not mention was that the study they quoted on the value of the Green Belt was actually a study of a single field in Chester in 1992. Also, the Centre for Cities did a recent report which looked again at the environmental constraints of the Green Belt, but there is nowhere in the Centre for Cities report which shows an appreciation of the fact that large areas of the Metropolitan Green Belt are country or regional parks. One element of Jonathan's [Manns] report which I would commend is the fact that he has made very clearly the point that you have about the Lee Valley Regional Park in the Green Belt and the very significant assets which have been allowed to grow over time because they have benefited from green belt policy.

Similarly, on de-designation, because these various voices like the Adam Smith Institute have underestimated the environmental value of the Green Belt, again they overestimate what is going to be gained from de-designating it in terms of new housing. We hear them screaming these figures that you can get 1 million new homes on the Metropolitan Green Belt if you relax controls on it around train stations, but that would assume they were going to build to a density of at least 40 or 50 dwellings per hectare, which is the average kind of Victorian street or something like that, a quite high-density suburb. It has to be questioned: is that really going to be realistic in Green Belt areas? Some of the Green Belt areas which have stations - for example, we say Iver, Brentwood, Shenfield, Brentwood, also Amersham and Chesham on the Metropolitan line - are already big places in their own right. They are already taken up for housing growth in their own right, and if you are saying that you are going to build a million homes in the Green Belt, you are talking about actually doubling or tripling the size of some of these places.

**Steve O'Connell AM (Deputy Chair):** What is your view on green belt swaps? I have never really completely understood that.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** It is a suggestion that if you do designate the Green Belt to accommodate housing development, you would then --

**Steve O'Connell AM (Deputy Chair):** Re-designate somewhere else.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** Yes. You would add new green belt elsewhere to replace it, and in our view that would completely defeat the purpose of designation. If you were to designate new green belt, it would have to be much further from the urban area of London. That would actually be self-defeating, in our view, and it is not necessarily guaranteed to be allowed in planning policy because, as Catriona [Riddell] may remember, in some of the regional plans they did actually try green belt swaps.

**Steve O'Connell AM (Deputy Chair):** Has that been tried? Is there a history of it?

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** It has been. Somewhere in the southwest, for example, they tried designating green belt land further out on the edges of the Bristol and Bath Green Belt to replace land that was going to be accommodating further extensions to Bristol, but planning inspectors actually prevented them from doing that on grounds that the new green belt was not justified in green belt policy.

**Steve O'Connell AM (Deputy Chair):** It does seem bonkers. Does anyone disagree with the fact that green belt swaps are bonkers? Jonathan?

**Jonathan Manns (Director of Planning, Colliers International):** It does seem contradictory.

**Steve O'Connell AM (Deputy Chair):** We need just to go back to Redbridge because at the beginning of the discussion you said, reluctantly or not reluctantly, your leadership there has to consider green belt. With the pressures that you have - you have this squeeze to build; you have your targets, they have to go somewhere and you are thinking about the Green Belt - tell me about that process and challenges, some of the things we have today and how are you going to address those?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** If I could just turn the clock back a bit to the adopted plan, which was 2008, it went to examination and we were unable at that time to demonstrate that we could deliver a ten-year supply in accordance with the Mayor's target.

**Steve O'Connell AM (Deputy Chair):** On existing brownfield site?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** On any site at that time within constraints of national and local policy being advanced at that time. We undertook to do a review to try to make up the gap that we had then, but it still went through. We started that review. In the meantime we got the population figures out of the census, which showed that Redbridge had grown by about 40,000, population, during that ten-year period, and the projections were that it would grow by another 70,000 over the forthcoming planned period.

We did the Strategic Housing Land Availability Assessment (SHLAA), the Strategic Housing Market Assessment (SHMA), all those things, and there was still a gap. We could only demonstrate at best a need of about 2,000 homes a year. We could not demonstrate that we could achieve half that. Parallel to that as part of the input into the local plan, we decided to do a Green Belt review because the Green Belt at Redbridge had not really been altered since it was first designed in 1957 through the initial development plan for Essex. It had hardly changed, not a square inch has been lost since then, and in any case the boundary of the Green Belt was quite irrational. It was simply froze life as it existed in 1957.

**Steve O'Connell AM (Deputy Chair):** They often are, are they not, historic and irrational boundaries?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** I suspect if we had the words 'sustainable development' in those days, we might have ended up with a different boundary, but that is at the side.

We embarked on the Green Belt review. The purpose of the review was not to identify land for housing as such. It was to review whether all the parcels of the borough continued to meet one of the Green Belt purposes, taking each site in the Green Belt, dissecting it parcel by parcel, and seeing whether it met one of the five purposes: whether it contributed to avoid urban sprawl, whether it helped to separate communities, whether it protected historic towns and so on. The result of that review was that a number of sites did not continue to meet the Green Belt purpose, and I gave you a figure earlier. It was about 187 hectares that were identified as potentially not continuing to meet the Green Belt purpose. The question was not: should it be developed? It was just whether it met the Green Belt purposes. The next question: if it was not Green Belt, how would you use it? That was a different question.

Parallel to this, we were attempting to find sites. We decided to try to focus development around certain criteria. It had to be near public transport. It had to be near a town centre to assist the vitality of the town centre and to be served by it. There had to be sites which were significant sites that could be developed comprehensively, rather than piecemeal in infill sites all over the borough, that could offer an opportunity for holistic, comprehensive development of a range of uses, different house types and so on. The members were quite taken with the idea of a contemporary garden suburb type of approach.

In the preferred option to the local plan which went forward for consultation, we identified five investment areas, three of which include substantial areas of Green Belt. Within that, we identified sites for infrastructure, schools and housing, and in total we put forward about 2,000 homes within those five investment areas within the Green Belt.

**Steve O'Connell AM (Deputy Chair):** When are you talking about again? When was this published?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** It was published in 2013. It went through a public consultation exercise. Initially it was fairly quiet. The objections started to come forward, not necessarily on the grounds of Green Belt loss, but on the grounds that some of the uses within that area were existing playing fields. The concept here was to try to develop areas of playing fields, but before they were developed we would find sites, very often within a stone's throw but within the Green Belt proposed to be --

**Steve O'Connell AM (Deputy Chair):** You are introducing another toxic issue, are you not?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** It is toxic. It is all toxic, but it is an attempt to --

**Nicky Gavron AM (Chair):** It is contaminated. We just talked about it.

**Steve O'Connell AM (Deputy Chair):** Toxic playing fields under there.

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** It is all an attempt to try to get a balanced approach to growth. We try to throw all the balls up in the air.

**Steve O'Connell AM (Deputy Chair):** It is a difficult position.

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** As a result of this, it was before the last election and so the cabinet member at the time decided to put a brake on the process and announced that we would look at all other options to growth to try to make up for the loss of the key growth area in the Green Belt. We did a consultation exercise, which I described earlier. One of them was a north-south access through the existing built-up area, increasing densities, intensifying uses and densities in those areas. We proposed to release the Green Belt proper, as I can put it, the Green Belt that still served a Green Belt purpose, and we proposed the option that was being considered, and we suggested the intensification of some other key development sites. We put them forward. The first one, the existing preferred option, received objections only from either the users of the sports ground that was concerned, sports organisations and the people immediately around.

**Tom Copley AM:** Were you going to replace the sports facilities that were lost?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** That would be embraced in the local planning policy that before the development could take place there would have to be a replacement. The biggest opposition was to the intensification of the existing built-up suburban area. Massive objection, for the reasons I explained earlier, big objections to the loss of Green Belt proper, very, very strong attachment to the Green Belt in our borough, and not much objection to the intensification of the other strategic development sites. We are left now to progress this forward, going back to our cabinet in April, with the advice of a panel, the --

**Steve O'Connell AM (Deputy Chair):** That is, lead with the shortfall. Logically, the narrative you have just gone through, there have been certain options that you are not going to do, and limited options that you are going to do. Ultimately, Redbridge is still going to have a challenge and a struggle around the targets.

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** Yes. We still have a target. We have a gap.

**Steve O'Connell AM (Deputy Chair):** Yes, as does the Mayor.

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** There is a gap. We believe, if every London borough did what we have done, we would probably help the Mayor close the gap that he has faced. We advanced that at the alterations inquiry. Yes. There would still be a gap, but if we take out these Green Belt sites there would be an even bigger gap. I forget the result of the examination, but I suspect the chance it would be found unsound would be increased.

**Steve O'Connell AM (Deputy Chair):** What are certain sites of greenfield that have gone through the process and you are likely to take forward to development?

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** This is the next stage. I had better not pre-empt what happens, but most --

**Steve O’Connell AM (Deputy Chair):** No, they are still in play.

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** Yes. At the moment we have a preferred option. We have gone out on other options, gotten bigger opposition, and it is quite good involvement. A lot of interest in the issues, which has been very positive, and we are now having to report those back to members to say, “This was your preferred option. We put out some alternative options, as you asked us to do. This is the response. How do you want to progress the local plan?”

**Steve O’Connell AM (Deputy Chair):** I should know this, Chair, and John Lett (GLA Planning Officer) is somewhere in the audience. If they go through the process and then release a level of greenfield site and go for consent, does that have to go come up to this building even though the number units are less than typical?

**Nicky Gavron AM (Chair):** Yes, because it would be a departure from the plan.

**Steve O’Connell AM (Deputy Chair):** From the London Plan, and then that adds a whole new political context to it, does it not?

**Nicky Gavron AM (Chair):** It is all very interesting. Can I just say? If we want to end at 12.30 pm, I am very keen that Noel [Farrer] comes in because we are hearing about the tradition or the original purposes of the Green Belt and there are other purposes that are 21st century purposes. We are looking at building, but there are others as well. Do not let me interrupt you.

**Tom Copley AM:** Sorry. I just wanted to say that it sounded rather like - and you said this garden city idea - the early conception of the Green Belt that Jonathan was talking about of the streets with gardens.

**Paul Miner (Senior Planning Officer, Campaign to Protect Rural England):** Ebenezer Howard [British initiator of the garden city movement], correct me if I am wrong, originally developed his concepts on the basis of urban villages, the first one being in Ilford, and so we have a tradition. 1840.

**Noel Farrer (President, Landscape Institute):** Maybe I start with Ebenezer Howard? The garden city movement is an interesting one. Is it not interesting that here we are today - I have been very interested to hear what Philipp [Rode] has had to say - grappling with the idea of housing growth, and the garden city is a political expression that we are using a lot, and it is an idea that is well over 100 years old? It is almost irrelevant conceptually to meeting the needs of a modern city. It just happens to sound good. We have not been able to think utopically in this country since the complete failure of Modernism in the 1940s, 1950s and 1960s, which we have then had to dismantle in the 1970s, and which we have subsequently dismantled. Thinking big, which is what this meeting is all about and which the Mayor needs to be thinking about, is absolutely valid, and it is interesting. Because we have not thought big in the context of modern living and modern lives for so long, we are grappling right the way back to Ebenezer Howard.

If you were to interrogate the garden city even slightly, the amounts of equations that he came together with and the amounts of food that he was going to grow in his time, on average everyone eats between four and six times more food than was in his calculation. It is nonsense to look at that model. We have to look at what the needs - a good question for Jonathan [Manns] - of the modern Green Belt are going to be today.

Someone touched on forestry. The Green Belt has much higher forestry, but there is a European Union (EU) target that our country consistently fails to hit, which is about the fact that we are supposed to be getting

above 25% afforestation across the whole of Europe. Sweden does it; Finland does it. Some countries do it. Even Germany manages to get there. We are way down. We are way down. We only have about 16% forested in this country. We actually have a commitment to Europe that we are supposed to be upping that. The green belt form is one of the only areas of the country that actually meets that afforestation requirement.

It touches on the fact that the Green Belt has some much larger strategic things that are forgotten about. Local government are not thinking about that EU afforestation target they need to be thinking about in terms of Green Belt. It all has to contribute. There is a bigger picture that needs to percolate down that is important first.

Then if you start thinking about it, the Green Belt is part of - and I like the idea that is part of it - Metropolitan London. Of course it is. It has a major contribution to the city. One of the reasons why London's growth has occurred, the idea that the Green Belt should stifle that growth, is that it has had the opposite effect because it increases the desirability of the whole piece. The Green Belt is a fundamental chunk of the reason why we love London. What needs to happen is that once we have people living in town, in these desirable places, in hubs - and I am very mindful of Philipp's [Rode] conversations - we have to say, "OK. What is the role of the Green Belt in that conversation?" It is huge. If you add 3 million more people to London, the Green Belt has a bigger job to do. What we have to do is flex the muscle to make sure that the Green Belt is doing that job, and that job is twofold. There is a human side and there is a natural, environmental side. I am quite interested in the human side. It is about leisure. It is about amenity. It is about access. There are a lot of people that live in green belts, in big, fat houses, have private properties and do not allow anyone in, and it is actually quite exclusive. I know that there is also a lot of access. It is a little bit like a national park sort of thinking. It does not have the focus of thinking. It is vulnerable to all of the different local authorities that work around it.

Maybe one - thinking about the Mayor - is about saying: how do we ensure that we have integrated cycle routes that we can show very positively for the people that are living in London, in a very short journey, you can be at this point here, and then you are at the beginning of a healthy living agenda and all the different types and aspects of leisure and recreation that you could possibly want, from the elderly to the young, to children, to play? You should be getting off a train in the Green Belt, and what should open up in front of you? I want to see someone renting bikes. I want to see someone with a fantastic woodland play area, so you can go off into the distance and you can do that. I want to see things that are going to mean that the Green Belt is absolutely contributing to the quality of lives, of the future of the people of London. It is not about taking chunks out of it and dealing with your housing needs bit, because you need the Green Belt in your city to do its job.

On the natural systems side, we know, in relation to climate change and climate resilience, the Green Belt has to perform a job. If you understand the issues, which you all will, around East London Green Grid, Lea Valley National Park, that finger of the national park leads out to the Green Belt. The connectivities of nature coming into London: air, oxygen, quality of air. All absolutely essential. Biodiversity in relation to species, habitats and ecology, as well as the animals, the fauna, that are supported by it. Absolutely fundamental for the enjoyment of the countryside.

The biggest thing: inner city housing, for me, the change, when we do the landscape improvement works in housing estates in inner city areas. One of the biggest changes for me is when I turn around to a resident, which we did the other day, an old boy, and he turned and said, "It used to be horrible here when there were just cars in all of that courtyard. Now you have completely greened up that courtyard, I see seasonable change." This morning I woke up and I listened to the birdsong. Life is all about that. The human, intrinsic

relationship between people and nature is absolutely fundamental. The Green Belt is a critical part of that, and getting people there to do it is fundamental.

Back to the climate side. We need to be thinking about natural aquifers, the lakes and flood resilience for London. How are we going to manage with our water? How are we going to ensure that we have ground absorption in those areas to make sure that it does not actually come into London as well, so that maybe things are going out to those sorts of areas? The landscape is now a very technical thing in relation to green infrastructure (GI) and all of the things it needs to provide, but those technical things will always double up as being opportunities. If we create reservoirs for water, if we create natural aquifers, then guess what? We can still use them and they are leisure opportunities as well. They are not inappropriate.

I do think it is right that we do need to relook at the Green Belt so that the question, "What does it do? What do we need it for?", is answered, but let us be answering that. I agree; therefore, we are not in the business of setting it in aspic. The Green Belt is not something that is just a red line on a plan and you do nothing. The idea that there are chunks of Green Belt that you are looking at where nothing happens anymore and it is just sat there, that makes it vulnerable. That is actually an abuse of how we should be thinking about how we use our Green Belt effectively. By using our Green Belt - and, frankly, from my point of view I have to say greenfield as well - sites effectively for what they need to do, then you are in a position to be able to evolve a city that is a modern city, a sustainable city in the future, with many, many more people in it.

I can go into detail - there are all sorts of issues on biodiversity - but the point is well made. I am happy to take questions.

**Nicky Gavron AM (Chair):** On the woodland point there is this report, Natural Capital, which is saying that London is as dry as Istanbul - it is not saying this, but just as an aside - and apparently we need this afforestation, the amount of woodland that we need in the country, and we are well short. The Green Belt, as we heard earlier from CPRE, 18% of it is woodland, and there is an argument, and it is not just for this country, that cities which are developing very rapidly and concreting over, of course, so much of their surfaces need to be ringed with woodland in order to give them an aquifer and to give them water.

**Noel Farrer (President, Landscape Institute):** That is exactly right. The loss of trees, particularly in large areas of trees like the Green Belt, is absolutely reducing cities' resilience and reducing resilience to climate change and flooding and, therefore, absorption of water, and it is significantly reducing the aquifer that we need for water supply.

That also applies, for me, in terms of bringing far more trees into the city as well. There is no question that high density does not mean not green. People have talked about roof gardens. People have talked about green walls, green roofs and green streets. You can do all of these things creatively through design and create, in significantly more dense areas, a lot greener areas as well. Increased densification does not necessarily mean that it becomes sterile in terms of its green environment.

**Nicky Gavron AM (Chair):** Are there reactions to that? We have a few moments and then we must wrap up.

**Andrew Boff AM:** I fully hear what you say about modern living but, as far as I know, people getting a pram up the stairs has been with us for centuries.

**Noel Farrer (President, Landscape Institute):** You get a lift.



**Andrew Boff AM:** They work so well, do they not?

**Noel Farrer (President, Landscape Institute):** They should. I do think the debate is on the quality, is it not? The quality means that the lift works, I hope.

**Andrew Boff AM:** Yes. Long-term maintenance costs.

**Nicky Gavron AM (Chair):** If there are no closing points from the panel.

**John Pearce (Head of Planning Policy and Environment, London Borough of Redbridge):** I could just make a short point just to clarify. When we were looking at whether the sites within the Green Belt in Redbridge met the Green Belt purpose, it was not in terms of use. Because the land was vacant, we were not suggesting that did not serve a purpose. It was being assessed against the criteria for the Green Belt, ie was it built upon? One of the sites used to be a mental asylum within hundreds of acres of open land. It is now a general hospital. Is very heavily built up. Hospitals used to be an acceptable Green Belt use. They are not now. It is only in terms of whether these areas were built upon and whether they contributed in terms of the purposes of containing the spread of London.

**Nicky Gavron AM (Chair):** I understand.

**Andrew Boff AM:** Surely everyone here understands that what the public sees - we just represent the public; that is all we are - is every time you give a little on the Green Belt, a mile is taken. An absolute mile. The arguments for clarifying bits of Green Belt in Redbridge are the same arguments of saying, "Hyde Park is really big and could do with being a bit smaller and having a housing estate on it".

**Tom Copley AM:** That is ridiculous. That is ridiculous.

**Andrew Boff AM:** Those bits of the Green Belt in outer London are as important to those residents as Hyde Park is to the residents in inner London.

**Tom Copley AM:** Not every single bit of Green Belt is equally important as every other piece of Green Belt. Surely it is not possible for that to be the case, Andrew. You are being elitist.

**Andrew Boff AM:** What I am saying is that residents see those arguments as used for opening the door --

**Tom Copley AM:** A piece of scrubland in Barnet is not as important as Hyde Park. That is just ridiculous.

**Steve O'Connell AM (Deputy Chair):** You are being elitist, Mr Copley. You are being elitist.

**Andrew Boff AM:** I am sorry. You are being elitist.

**Jonathan Manns (Director of Planning, Colliers International):** This is why you need to take a comprehensive view -

**Andrew Boff AM:** A piece of scrubland in Barnet, which people use to walk their dogs on, is less important than Hyde Park?

**Tom Copley AM:** It is not necessarily the case that every single piece of Green Belt is of exactly the same importance as every other. It is a ludicrous thing to say.

**Andrew Boff AM:** Hyde Park is really big.

**Tom Copley AM:** It is like saying that every piece of land is as important as every other or every piece of housing is as important as every other. It is absolute rubbish.

**Andrew Boff AM:** Hyde Park is very big. You would not miss it. We could get a lot of housing land by filling the canals.

**Nicky Gavron AM (Chair):** It is time to bring the meeting to a close. Can I thank all the guests for their attendance. The discussion has been very useful, and we need to review and take on board all the issues that have been raised today, which we will do.

**Subject: Summary List of Actions****Report to: Planning Committee****Report of: Executive Director of Secretariat****Date: 18 March 2015****This report will be considered in public****1. Summary**

1.1 This report sets out for noting actions arising from previous meetings of the Committee.

**2. Recommendation**2.1 **That the Committee notes the outstanding actions arising from previous meetings of the Committee, as listed below.****Meeting of 22 January 2014**

<b>Minute item</b>	<b>Subject and action required</b>	<b>Status</b>	<b>Action by</b>	<b>Deadline, if applicable</b>
6.	<p><b>Options for Accommodating London's Growth</b> - During discussion, guests (as specified) agreed to supply information on –</p> <ul style="list-style-type: none"> <li>The 'hardcore' brownfield sites in London (Paul Miner, Campaign to Protect Rural England CPRE); and</li> <li>The percentage/area of green belt and brownfield land contained within Redbridge's 40 regeneration sites, and details of what is being proposed in terms of housing numbers and typology (John Pearce, LB Redbridge).</li> </ul>	<p>Report received (<b>See Appendix 1</b>).</p> <p>Briefing received (<b>See Appendix 2</b>).</p>	<p>CPRE</p> <p>LB Redbridge</p>	n/a

## Meeting of 18 November 2014

Minute item	Subject and action required	Status	Action by	Deadline, if applicable
6.	<p><b>The Mayor's Strategic Planning Decisions</b></p> <p>GLA planning officers agreed to supply the Committee with some statistics around the number of London planning applications which are, and which are not, determined within the boroughs' 16 week target.</p>	Awaiting response.	GLA planning officers	n/a

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### List of appendices to this report:

Appendix 1 – CPRE report

Appendix 2 – Briefing from London Borough of Redbridge

### Local Government (Access to Information) Act 1985

List of Background Papers:

All agenda papers and minutes for meetings of the Planning Committee.

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# **From Wasted Space to Living Spaces: Appendices**

## **The Availability of Brownfield Land for Housing Development in England**

### **University of the West of England, for the Campaign to Protect Rural England**

Dr Danielle Sinnett; Dr Laurence Carmichael; Professor Katie Williams;  
Paul Miner

November, 2014

## Appendix A Local planning authorities who responded to the request for NLUD data.

	Response	NLUD
<b>North West</b>		
Allerdale	N	
Barrow-in-Furness	Y	N
Blackburn with Darwen	Y	N
Blackpool	Y	N
Bolton	Y	2012
Burnley	N	
Bury	Y	2011, 2012
Carlisle	Y	N
Cheshire East	N	
Cheshire West and Chester	Y	2011, 2012, 2013
Chorley	Y	2011
Copeland	N	
Eden	Y	2013
Fylde	Y	2011, 2012, 2013
Halton	Y	2011
Hyndburn	N	
Knowsley	Y	2011, 2012
Lancaster	Y	2011, 2012
Liverpool	Y	2011, 2012, 2013
Manchester	N	
Oldham	Y	2011, 2012
Pendle	Y	2011, 2012, 2013
Preston	Y	N
Ribble Valley	Y	N
Rochdale	Y	N
Rossendale	Y	2011, 2012
Salford	Y	N
Sefton	Y	N
South Lakeland	Y	2011, 2012
South Ribble	Y	N
St. Helens	Y	2011, 2012
Stockport	N	
Tameside	Y	N
Trafford	Y	2011, 2012
Warrington	Y	2011, 2012
West Lancashire	Y	2011, 2012, 2013
Wigan	Y	N

**Appendix A continued**

	Response	NLUD
Wirral	Y	2011, 2012, 2013
Wyre	Y	2011, 2012, 2013
<b>North East</b>		
Darlington	N	
County Durham	N	
Gateshead	Y	N
Hartlepool	Y	N
Middlesbrough	N	
Newcastle upon Tyne	Y	N
North Tyneside	Y	N
Northumberland	N	
Redcar and Cleveland	Y	2011, 2012
South Tyneside	Y	2012
Stockton-on-Tees	N	
Sunderland	Y	2011, 2012
<b>Yorkshire and The Humber</b>		
Barnsley	N	
Bradford	Y	N
Calderdale	Y	2012
Craven	Y	2011
Doncaster	N	
East Riding of Yorkshire	Y	N
Hambleton	Y	2011, 2012
Harrogate	Y	N
Kingston Upon Hull	Y	N
Kirklees	Y	N
Leeds	N	
North East Lincolnshire	Y	2011, 2012, 2013
North Lincolnshire	Y	2012
Richmondshire	Y	N
Rotherham	Y	2012
Ryedale	Y	2012
Scarborough	Y	2012
Selby	Y	N
Sheffield	Y	2011, 2012
Wakefield	Y	2011, 2012, 2013
York	Y	2011
<b>West Midlands</b>		
Birmingham	N	

**Appendix A continued**

	Response	NLUD
Bromsgrove	Y	N
Cannock Chase	Y	2011
Coventry	Y	N
Dudley	Y	2012
East Staffordshire	Y	2011, 2012
Herefordshire	Y	N
Lichfield	Y	2011, 2012
Malvern Hills	Y	2011, 2012
Newcastle-under-Lyme	Y	N
North Warwickshire	Y	N
Nuneaton and Bedworth	Y	2011, 2013
Redditch	Y	2011, 2012
Rugby	N	
Sandwell	Y	2012
Shropshire	Y	2012
Solihull	Y	2011
South Staffordshire	Y	N
Stafford	Y	2012, 2013
Staffordshire Moorlands	N	
Stoke-on-Trent	N	
Stratford-on-Avon	Y	N
Tamworth	N	
Telford and Wrekin	Y	N
Walsall	Y	2011, 2012, 2013
Warwick	Y	N
Wolverhampton	N	
Worcester	Y	N
Wychavon	Y	2011, 2012
Wyre Forest	Y	2011, 2012
<b>East Midlands</b>		
Amber Valley	Y	2011, 2014
Ashfield	Y	N
Bassetlaw	Y	2011
Blaby	Y	N
Bolsover	Y	2011, 2012
Boston	Y	2011, 2012, 2013
Broxtowe	Y	N
Charnwood	Y	2012, 2013
Chesterfield	Y	2011, 2012



**Appendix A continued**

	Response	NLUD
Corby	Y	2011, 2012
Daventry	N	
Derby	N	
Derbyshire Dales	N	
East Lindsey	Y	N (2014)
East Northamptonshire	Y	2012
Erewash	Y	N
Gedling	Y	2011, 2012
Harborough	Y	N
High Peak	N	
Hinckley and Bosworth	Y	2011
Kettering	Y	N
Leicester	Y	N
Lincoln	Y	2011
Mansfield	Y	N
Melton	Y	2011, 2012
Newark and Sherwood	Y	N
North East Derbyshire	Y	2011, 2012
North Kesteven	Y	2012
North West Leicestershire	Y	N
Northampton	Y	N
Nottingham	Y	N
Oadby and Wigston	Y	2011, 2012
Rushcliffe	Y	N
Rutland	N	
South Derbyshire	Y	2011, 2012
South Holland	Y	2012
South Kesteven	Y	N
South Northamptonshire	Y	N
Wellingborough	Y	N
West Lindsey	N	
<b>East of England</b>		
Babergh	N	
Basildon	Y	N
Bedford	Y	2011, 2012, 2013
Braintree	Y	N
Breckland	Y	2012
Brentwood	Y	2011, 2012
Broadland	Y	2011, 2012, 2013

**Appendix A continued**

	Response	NLUD
Broxbourne	Y	2011, 2012
Cambridge	Y	N
Castle Point	Y	N
Central Bedfordshire	Y	2011
Chelmsford	Y	N
Colchester	Y	N
Dacorum	Y	N
East Cambridgeshire	Y	2011, 2012
East Hertfordshire	Y	N
Epping Forest	Y	N
Fenland	Y	N
Forest Heath	Y	N
Great Yarmouth	Y	2011, 2012
Harlow	Y	2011, 2012
Hertsmere	N	
Huntingdonshire	Y	2011, 2012, 2013
Ipswich	Y	2011, 2012
King's Lynn and West Norfolk	Y	2011
Luton	N	
Maldon	Y	N
Mid Suffolk	Y	N
North Hertfordshire	Y	2011
North Norfolk	Y	2011, 2012
Norwich	Y	N
Peterborough	Y	N
Rochford	Y	N
South Cambridgeshire	Y	2011, 2012
South Norfolk	Y	N
Southend-on-Sea	Y	2011, 2012, 2013
St Albans	Y	2012
St Edmundsbury	N	
Stevenage	Y	2011
Suffolk Coastal	Y	N
Tendring	Y	N
Three Rivers	Y	2011, 2012
Thurrock	Y	2012
Uttlesford	Y	2011, 2012
Watford	Y	2011, 2012
Waveney	Y	2011, 2012

**Appendix A continued**

	Response	NLUD
Welwyn Hatfield	Y	N
<b>South West</b>		
Bath and North East Somerset	Y	N
Bournemouth	Y	N
Bristol	Y	2011, 2012, 2013
Cheltenham	N	
Christchurch	Y (East Dorset)	N
Cornwall	Y	N
Cotswold	Y	2011
East Devon	Y	N
East Dorset	N	
Exeter	Y	N
Forest of Dean	Y	2011, 2012, 2013
Gloucester	Y	2012
Mendip	Y	2012
Mid Devon	Y	2011, 2012, 2013
North Devon	Y	N
North Dorset	N	
North Somerset	Y	2011, 2012
Plymouth	Y	2011
Poole	Y	2011, 2012
Purbeck	Y	2011, 2012
Sedgemoor	Y	N
South Gloucestershire	Y	2011, 2012
South Hams	Y	N
South Somerset	Y	N
Stroud	Y	N
Swindon	Y	2011
Taunton Deane	N	
Teignbridge	Y	N
Tewkesbury	Y	N
Torbay	N	2011, 2012
Torridge	Y	2011, 2012, 2013
West Devon	Y	2011, 2012
West Dorset	Y (Weymouth)	
West Somerset	N	
Weymouth and Portland	Y	N
Wiltshire	Y	2012

**Appendix A continued**

	Response	NLUD
<b>South East</b>		
Adur	N	
Arun	Y	N
Ashford	Y	2011, 2012
Aylesbury Vale	Y	2011, 2012
Basingstoke and Deane	Y	N
Bracknell Forest	Y	N
Brighton and Hove	Y	2011, 2012
Canterbury	Y	N
Cherwell	Y	2011
Chichester	Y	N
Chiltern	N	
Crawley	Y	2011, 2012
Dartford	Y	2011, 2012
Dover	N	
East Hampshire	Y	N
Eastbourne	Y	2011, 2012, 2013, 2014
Eastleigh	Y	N
Elmbridge	Y	2011
Epsom and Ewell	Y	2011
Fareham	Y	2011, 2012, 2013
Gosport	Y	2011, 2012
Gravesham	Y	2011
Guildford	Y	N
Hart	Y	N
Hastings	N	
Havant	Y	N
Horsham	Y	2012
Isle of Wight	N	
Lewes	Y	N
Maidstone	Y	N
Medway	Y	2011, 2012, 2013
Mid Sussex	Y	N
Milton Keynes	N	
Mole Valley	Y	2011
New Forest	Y	N
Oxford	Y	N
Portsmouth	Y	2011, 2012
Reading	N	

**Appendix A continued**

	Response	NLUD
Reigate and Banstead	Y	2011, 2012
Rother	N	
Runnymede	Y	2011
Rushmoor	Y	N
Sevenoaks	Y	2011, 2012
Shepway	N	
Slough	Y	N
South Buckinghamshire	Y	2012
South Oxfordshire	Y	N
Southampton	Y	2011
Spelthorne	Y	N
Surrey Heath	N	
Swale	Y	2012
Tandridge	N	
Test Valley	Y	2012, 2013
Thanet	Y	N
Tonbridge and Malling	Y	2011, 2012
Tunbridge Wells	Y	2011, 2012
Vale of White Horse	N	
Waverley	N	
Wealden	Y	2012
West Berkshire	Y	N
West Oxfordshire	Y	2011, 2012
Winchester	Y	N
Windsor and Maidenhead	Y	N
Woking	Y	N
Wokingham	Y	2012
Wycombe	Y	N
Worthing	N (with Adur)	
<b>London</b>		
Barking and Dagenham	Y	N
Barnet	Y	2011, 2012
Bexley	Y	N
Brent	Y	N
Bromley	Y	N
Camden	N	
City of London	Y	N
Croydon	Y	N
Ealing	Y	N

**Appendix A continued**

	Response	NLUD
Enfield	Y	N
Greenwich	N	
Hackney	Y	N
Hammersmith and Fulham	Y	2011, 2012
Haringey	N	
Harrow	Y	2011, 2012, 2013
Havering	N	
Hillingdon	N	
Hounslow	N	
Islington	Y	N
Kensington and Chelsea	Y	N
Kingston upon Thames	Y	N
Lambeth	Y	2012
Lewisham	N	
Merton	Y	N
Newham	Y	N
Redbridge	Y	N
Richmond upon Thames	N	
Southwark	Y	N
Sutton	N	N
Tower Hamlets	Y	N
Waltham Forest	Y	2011, 2012, 2013
Wandsworth	Y	2011, 2012
Westminster	Y	2012

## Appendix B. Delegate list for the Expert Symposium

Delegate	Organisation
Abdul Choudhury	RICS
Adrian Brown	The Berkeley Group
Alan Scott	DCLG
Alex McGill	CPRE
Andrew Needham	CPRE Cheshire
Atam Verdi	Aspinall Verdi
Cecilia Wong	University of Manchester
Euan Hall	Land Trust
Ghislaine Trehearne	BPF
Joe Kilroy	RTPI
Richard Pestell	Peter Brett Associates
Samantha Davenport	Natural England
Shaun Spiers	CPRE
Stephen Biddulph	DCLG
Stephen Walker	
Tristan Dewhurst	GVA
Also in attendance:	
Danielle Sinnett	UWE
Katie Williams	UWE
Laurence Carmichael	UWE
Luke Burroughs	CPRE
Matt Thomson	CPRE
Neil Sinden	CPRE
Paul Miner	CPRE

## **Appendix C. Case study methodology.**

### **1.1 Criteria for case study selection**

We have reviewed the brownfield strategies of seven local authorities. The case studies were chosen using a range of criteria in order to ensure their representativeness:

- Results of stage 1 analysis, i.e. case studies were chosen amongst local authorities who responded to our survey of local authorities.
- We also looked at the local demand for housing identified from broad economic forecasts for England.
- Finally, we were interested in a broad representation of regional cases as well as a mix of urban and rural authorities.

The following local authorities were chosen as case studies:

- London Borough of Barnet
- Bristol City Council
- Cheshire West and Chester
- Crawley Borough Council
- Durham County Council
- South Cambridgeshire District Council
- Worcester City Council

### **1.2 Methodology**

The desk review identified the national policy framework in which local authorities operate and examined how this framework was implemented. We examined how brownfields are promoted within the local planning system and through the evidence base. (Key planning and other relevant documents for each LA were examined, are listed below). We reviewed mechanisms for community engagement and partnerships.

- Local plan
- Core strategy
- Planning policies DPD
- Site allocation DPD
- City centre DPD
- Statement of community involvement
- Supplementary planning documents
- Authority/Annual Monitoring Report
- Strategic Housing Land Availability Assessment
- Employment and Economic Land Assessment
- Sustainability appraisal
- Other technical studies
- Calls for sites information



- Neighbourhood plans
- Brownfield Land Action Plans

The documents are all available from the following websites:

<http://barnet.gov.uk>

<http://www.bristol.gov.uk>

<http://www.cheshirewestandchester.gov.uk>

<http://www.crawley.gov.uk>

<http://www.durham.gov.uk>

<https://www.scambs.gov.uk>

<http://www.swdevelopmentplan.org>

<http://www.winsford.gov.uk>

The desk research was supplemented by eight telephone interviews with planners within strategic city planning or spatial planning teams, and one former councillor. It was not possible to obtain interviews with Durham County Council within the time frame of the research in view of their tight schedule in preparation for the Examination In Public of their local plan.

### **1.3 Interview questions**

#### **1. What is the nature of your involvement with brownfield development?**

Can you summarise the context of brownfield land development in your area, for example, do you have a lot of sites, is their development a priority?

#### **2. Working in the current national policy and regulatory framework:**

What would you say are the impacts of the recent changes in national policy and regulatory frameworks on your approach to brownfield redevelopment?

Has the NPPF/National Planning Guidance made it easier for you to develop brownfields?

Are there any policy barriers or incentives to delivery and what are they?

#### **3. Implementation mechanisms: your local brownfield strategy:**

Do you have a specific brownfield development strategy, if so, where does it sit within your local planning policy?

Do you have a specific document for it or is it incorporated in your local plan, supplementary planning guidance, other policy strategies or plans?

What is your local authority's vision/priorities for brownfield policy and delivery of housing in local plan (or other overarching policies)?

Have you set a brownfield target?

Have you got a brownfield first strategy?

What is your position on windfall sites? Have you got a policy to bring sites forward?

Do you think the recent government announcement on the use of LDOs on most brownfield sites for housing projects will be useful for you and contribute to meeting housing objectives for local area?

**4. Implementation mechanisms to develop brownfields: engaging with stakeholders**

Have you got specific mechanisms to facilitate brownfields coming forward, and what are they?

Do you use partnership working to implement your brownfield policy, to maintain transparency and deliver sustainable development? What form does this take? What steps have you taken to form partnerships with developers, landlords, communities?

Is the involvement of local communities part of your brownfield policy? Do you facilitate communities to engage with the various stages of brownfield policy: identification, options, design, delivery? How?

In your experience are communities and residents interested in bringing brownfields forwards and participating in the process?

What is the role of other actors and how do you facilitate their role: regulators (EA...) (private sector, developers, LEPs)

### Appendix D. Response rates from local planning authorities to supply NLUD data for 2011, 2012 and 2013.

Region	Number (response rate)	Number of local planning authorities providing NLUD data (response rate)		
		2011	2012	2013
North West	32 (82%)	18 (46%)	17 (44%)	9 (23%)
North East	7 (58%)	2 (17%)	3 (25%)	0
Yorkshire and The Humber	18 (86%)	6 (29%)	9 (43%)	2 (10%)
West Midlands	24 (80%)	10 (33%)	11 (37%)	3 (10%)
East Midlands	34 (85%)	13 (33%)	13 (33%)	2 (5%)
East of England	43 (91%)	20 (43%)	19 (40%)	4 (9%)
South West	30 (83%)	13 (36%)	11 (31%)	4 (11%)
South East	53 (79%)	22 (33%)	21 (31%)	4 (6%)
London	24 (73%)	5 (15%)	7 (21%)	2 (6%)
England	265 (82%)	109 (34%)	111 (34%)	30 (9%)

## **Appendix E. Explanation on the use of completeness assessment figures.**

Government summaries have adjusted the data in the NLUD for 'completeness'. Each local planning authority provides an assessment of the 'completeness' of their data by land type (e.g. they judge that the NLUD contains 80% of land type A, 65% of land type B and so on). However, not all local planning authorities provided their completeness assessments and a back calculation based on the published (adjusted) data and the raw 2010 data found that there were many inconsistencies in these figures (partly also due to the rounding of area to the nearest 10 ha). This was particularly problematic in local planning authorities with very small areas of PDL where a zero area was reported, but the raw data suggested that there was a small area (generally less than 10 ha) in that local planning authority. In some cases the back calculation suggested that local planning authorities had overestimated their brownfield land.

In addition, the completeness assessments are provided by land type only so it is not possible to robustly take these into account when estimating the amount of land suitable for housing or the planning status, as it cannot be assumed that the completeness applies equally. For example, if land type A has a completeness of 80%, it cannot be assumed that land type A that is suitable for housing and land type A that is not suitable for housing both have a completeness of 80%; one maybe greater than the other. In fact, it is likely that there will be considerable bias as local planning authorities are presumably more likely to be aware of sites with planning permission, for example, than those with none, so an overall completeness of 80% may be closer to 100% in sites that are allocated in Local Plans or have planning permission and much lower than 80% in sites with none. The use of completeness assessments, as well as the inclusion of land type E, has resulted in significant criticism of NLUD.

## Appendix F. Area (ha) of PDL by land type from the National Land Use Database in 2010, 2011 and 2012.

Region	A: Previously developed land now vacant	B: Vacant buildings	C: Derelict land and buildings	D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission	Total A-D	
2010	North West	3,005	703	4,081	1,958	9,747
	North East	1,563	234	886	1,084	3,767
	Yorkshire and The Humber	2,242	624	1,398	1,076	5,340
	West Midlands	1,385	428	1,318	999	4,130
	East Midlands	1,276	294	1,437	1,400	4,406
	East of England	1,661	340	1,228	1,957	5,186
	South West	879	218	1,497	1,345	3,938
	South East	1,257	482	970	5,003	7,712
	London	640	333	273	2,077	3,322
England	13,908 ha	3,656 ha	13,088 ha	16,899 ha	47,548 ha	
2011	North West	2,785	605	3,266	2,442	9,098
	North East	1,503	233	885	1,116	3,736
	Yorkshire and The Humber	2,201	615	1,396	1,072	5,285
	West Midlands	1,239	442	1,287	1,001	3,969
	East Midlands	1,169	286	1,396	1,468	4,319
	East of England	1,455	370	1,165	2,123	5,113
	South West	715	226	1,439	1,524	3,904
	South East	1,308	433	1,017	4,790	7,548
	London	638	324	269	2,119	3,350
England	13,013 ha	3,534 ha	12,120 ha	17,655 ha	46,322 ha	
2012	North West	2,726	592	3,901	1,822	9,042
	North East	1,508	223	869	1,100	3,700
	Yorkshire and The Humber	1,910	630	1,358	1,253	5,149
	West Midlands	1,268	445	1,290	942	3,946
	East Midlands	1,192	280	1,368	1,246	4,085
	East of England	1,778	326	1,134	1,950	5,187
	South West	694	227	1,442	1,553	3,916
	South East	1,244	427	995	4,101	6,768
	London	670	317	255	2,088	3,330
England	12,990 ha	3,467 ha	12,612 ha	16,055 ha	45,123 ha	

### Appendix G. Area (ha) of PDL by land type for each local authority from the National Land Use Database in 2012.

Local authority	A: Previously developed land now vacant	B: Vacant buildings	C: Derelict land and buildings	D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission	Total A-D
<b>North West</b>	<b>2,726</b>	<b>592</b>	<b>3,901</b>	<b>1,822</b>	<b>9,042</b>
Allerdale	76	4	419	12	511
Barrow-in-Furness	48	3	39	19	108
Blackburn with Darwen	37	28	55	16	135
Blackpool	19	0	0	43	62
Bolton	19	12	48	98	178
Burnley	30	21	42	74	168
Bury	113	24	97	61	295
Carlisle	49	29	71	214	364
Cheshire East	24	43	40	101	208
Cheshire West and Chester	193	77	1,271	124	1,665
Chorley	17	4	128	8	158
Copeland	44	20	120	9	193
Eden	0	2	1	2	6
Fylde	11	2	3	59	74
Halton	0	11	0	0	11
Hyndburn	0	0	47	6	52
Knowsley	112	1	55	45	213
Lancaster	6	18	24	20	68
Liverpool	212	22	237	41	512
Manchester	153	72	77	168	470
Oldham	59	7	13	183	262
Pendle	11	1	29	6	46
Preston	71	6	25	14	117
Ribble Valley	5	1	0	1	7
Rochdale	50	36	3	87	176
Rossendale	33	1	44	0	77
Salford	239	15	146	81	481
Sefton	72	3	0	109	184
South Lakeland	3	2	1	3	8
South Ribble	75	16	0	17	109
St. Helens	68	2	135	8	212

**Appendix G continued**

Local authority	A	B	C	D	Total A-D
Stockport	32	11	53	21	118
Tameside	31	28	105	37	201
Trafford	68	1	13	49	131
Warrington	302	18	44	13	377
West Lancashire	34	6	51	15	105
Wigan	236	5	377	39	658
Wirral	78	12	84	17	191
Wyre	95	28	3	4	131
<b>North East</b>	<b>1,508</b>	<b>223</b>	<b>869</b>	<b>1,100</b>	<b>3,700</b>
County Durham	285	68	86	293	732
Darlington	115	9	6	47	177
Gateshead	138	41	92	41	312
Hartlepool	110	22	27	8	167
Middlesbrough	61	0	4	108	173
Newcastle upon Tyne	224	24	0	66	314
North Tyneside	7	0	51	5	63
Northumberland	91	11	201	119	422
Redcar and Cleveland	329	5	37	119	491
South Tyneside	39	2	15	5	61
Stockton-on-Tees	56	11	325	0	393
Sunderland	51	29	25	290	395
<b>Yorkshire and The Humber</b>	<b>1,910</b>	<b>630</b>	<b>1,358</b>	<b>1,253</b>	<b>5,149</b>
Barnsley	94	69	6	0	169
Bradford	82	3	17	34	135
Calderdale	44	1	17	6	67
Craven	0	1	2	4	7
Doncaster	149	0	46	11	206
East Riding of Yorkshire	102	14	417	145	678
Hambleton	0	3	0	9	12
Harrogate	13	1	4	6	23
Kingston Upon Hull	103	5	71	11	189
Kirklees	79	20	101	94	294
Leeds	241	251	340	150	983
North East Lincolnshire	21	6	41	4	72
North Lincolnshire	108	56	94	216	474
Richmondshire	64	2	0	1	67
Rotherham	58	15	21	140	235
Ryedale	0	0	0	0	0
Scarborough	28	1	1	5	35
Selby	240	127	4	316	687
Sheffield	388	30	55	21	495
Wakefield	70	2	79	59	211
York	24	23	41	22	110

**Appendix G continued**

Local authority	A	B	C	D	Total A-D
<b>West Midlands</b>	<b>1,268</b>	<b>445</b>	<b>1,290</b>	<b>942</b>	<b>3,946</b>
Birmingham	217	57	65	227	566
Bromsgrove	38	3	11	9	60
Cannock Chase	12	0	81	29	122
Coventry	40	44	21	80	185
Dudley	115	9	27	29	180
East Staffordshire	15	8	6	15	44
Herefordshire	3	16	0	8	27
Lichfield	16	8	7	4	35
Malvern Hills	0	1	2	11	13
Newcastle-under-Lyme	50	6	24	15	95
North Warwickshire	32	13	61	8	114
Nuneaton and Bedworth	9	9	60	15	93
Redditch	0	0	8	0	8
Rugby	109	0	0	35	144
Sandwell	68	2	69	98	236
Shropshire	7	6	39	34	86
Solihull	2	3	0	13	18
South Staffordshire	9	2	52	21	84
Stafford	39	82	93	7	221
Staffordshire Moorlands	49	16	23	33	121
Stoke-on-Trent	161	20	160	22	363
Stratford-on-Avon	22	19	17	132	190
Tamworth	3	6	1	3	13
Telford and Wrekin	16	28	295	0	340
Walsall	45	10	56	26	138
Warwick	5	0	5	2	13
Wolverhampton	149	47	66	1	263
Worcester	21	3	1	23	48
Wychavon	6	0	2	9	18
Wyre Forest	9	27	41	33	110
<b>East Midlands</b>	<b>1,192</b>	<b>280</b>	<b>1,368</b>	<b>1,246</b>	<b>4,085</b>
Amber Valley	26	25	46	7	103
Ashfield	1	5	6	3	14
Bassetlaw	34	2	11	41	88
Blaby	8	1	4	25	38
Bolsover	105	14	50	22	191
Boston	6	4	1	10	20
Broxtowe	85	2	56	23	165
Charnwood	14	6	33	5	58
Chesterfield	128	6	63	3	200
Corby	90	4	60	0	155
Daventry	0	1	0	2	3



**Appendix G continued**

Local authority	A	B	C	D	Total A-D
Derby	56	41	0	70	167
Derbyshire Dales	4	19	328	18	369
East Lindsey	14	6	2	1	23
East Northamptonshire	21	9	6	98	135
Erewash	6	1	13	9	28
Gedling	39	1	0	10	50
Harborough	5	0	4	15	23
High Peak	6	1	41	20	69
Hinckley and Bosworth	6	7	119	36	168
Kettering	5	7	0	5	17
Leicester	47	15	4	30	96
Lincoln	11	7	44	3	65
Mansfield	19	5	5	30	58
Melton	14	0	30	8	52
Newark and Sherwood	1	0	51	32	83
North East Derbyshire	20	8	61	11	100
North Kesteven	3	0	42	5	50
North West Leicestershire	4	2	6	5	18
Northampton	29	5	39	56	129
Nottingham	72	11	3	316	403
Oadby and Wigston	0	1	0	4	6
Rushcliffe	3	4	40	95	142
Rutland	2	0	1	17	20
South Derbyshire	212	17	109	45	383
South Holland	26	6	4	11	46
South Kesteven	34	3	9	58	104
South Northamptonshire	6	0	0	42	48
Wellingborough	15	17	2	34	67
West Lindsey	17	17	72	24	130
<b>East of England</b>	<b>1,778</b>	<b>326</b>	<b>1,133</b>	<b>1,950</b>	<b>5,187</b>
Babergh	3	28	10	6	47
Basildon	5	1	0	47	54
Bedford	32	6	93	14	145
Braintree	6	1	11	29	46
Breckland	16	1	9	14	39
Brentwood	1	1	0	14	15
Broadland	52	0	0	16	68
Broxbourne	0	1	0	8	9
Cambridge	1	0	8	23	33
Castle Point	18	0	0	135	153
Central Bedfordshire	98	20	8	204	330
Chelmsford	0	0	4	31	35

**Appendix G continued**

Local authority	A	B	C	D	Total A-D
Colchester	71	11	1	81	164
Dacorum	0	0	0	28	28
East Cambridgeshire	3	1	1	3	8
East Hertfordshire	6	26	11	13	56
Epping Forest	0	0	0	174	174
Fenland	40	3	19	15	77
Forest Heath	5	3	20	22	50
Great Yarmouth	16	1	1	1	20
Harlow	3	14	3	11	30
Hertsmere	2	6	0	38	45
Huntingdonshire	425	26	24	1	476
Ipswich	54	5	4	39	101
Kings Lynn and West Norfolk	74	6	12	24	116
Luton	18	14	8	15	54
Maldon	0	0	0	0	0
Mid Suffolk	6	8	13	5	32
North Hertfordshire	2	0	3	7	11
North Norfolk	110	52	3	47	212
Norwich	22	5	13	50	91
Peterborough	4	1	712	87	804
Rochford	1	12	4	7	25
South Cambridgeshire	248	0	0	166	413
South Norfolk	6	12	7	21	46
Southend-on-Sea	6	5	2	12	26
St. Albans	0	0	0	179	179
St. Edmundsbury	6	1	1	67	74
Stevenage	7	0	0	29	36
Suffolk Coastal	11	10	0	34	55
Tendring	2	0	1	13	16
Three Rivers	17	8	0	2	27
Thurrock	277	1	122	109	509
Uttlesford	1	5	4	2	12
Watford	1	0	0	28	30
Waveney	85	29	1	37	151
Welwyn Hatfield	16	2	0	45	64
<b>South West</b>	<b>694</b>	<b>227</b>	<b>1,442</b>	<b>1,553</b>	<b>3,916</b>
Bath and North East Somerset	39	3	29	39	110
Bournemouth	1	3	0	17	20
Bristol	102	16	35	64	217
Cheltenham	1	0	3	4	9
Christchurch	3	1	0	91	95
Cornwall	87	20	671	116	894
Cotswold	1	0	30	13	45

**Appendix G continued**

Local authority	A	B	C	D	Total A-D
East Devon	0	0	50	0	50
East Dorset	1	0	0	40	40
Exeter	17	10	31	32	89
Forest of Dean	5	8	7	19	40
Gloucester	4	0	16	38	57
Mendip	10	5	11	18	43
Mid Devon	1	16	1	12	30
North Devon	4	1	14	39	59
North Dorset	1	0	1	7	10
North Somerset	7	0	266	58	331
Plymouth	21	18	18	158	215
Poole	15	0	14	95	123
Purbeck	5	0	2	1	8
Sedgemoor	245	0	15	8	269
South Gloucestershire	6	13	0	246	264
South Hams	0	6	0	12	18
South Somerset	7	4	10	52	73
Stroud	7	4	2	39	52
Swindon	17	18	3	25	63
Taunton Deane	10	0	6	26	43
Teignbridge	8	18	12	9	47
Tewkesbury	0	1	3	1	4
Torbay	2	1	46	24	72
Torridge	5	1	80	11	98
West Devon	2	3	1	1	7
West Dorset	3	6	0	19	28
West Somerset	2	0	1	5	9
Weymouth and Portland	9	0	0	160	169
Wiltshire	45	52	65	54	216
<b>South East</b>	<b>1,244</b>	<b>427</b>	<b>995</b>	<b>4,101</b>	<b>6,767</b>
Adur	0	1	2	4	8
Arun	16	11	0	2	29
Ashford	20	9	8	8	46
Aylesbury Vale	23	8	12	197	239
Basingstoke and Deane	5	6	0	10	22
Bracknell Forest	10	0	0	107	117
Brighton and Hove	4	3	3	48	58
Canterbury	2	9	0	60	72
Cherwell	73	7	0	585	665
Chichester	10	0	23	48	81
Chiltern	0	3	0	42	45
Crawley	0	0	0	0	0
Dartford	379	41	256	171	846

**Appendix G continued**

Local authority	A	B	C	D	Total A-D
Dover	55	37	76	117	286
East Hampshire	11	5	14	8	37
Eastbourne	12	2	4	4	22
Eastleigh	2	12	0	0	13
Elmbridge	0	0	0	5	5
Epsom and Ewell	0	0	0	5	5
Fareham	75	1	0	4	79
Gosport	41	0	3	31	75
Gravesham	49	1	21	84	155
Guildford	0	1	0	130	131
Hart	23	0	0	7	30
Hastings	4	0	7	3	15
Havant	0	2	0	37	40
Horsham	0	0	71	27	98
Isle of Wight	5	3	0	15	23
Lewes	15	5	4	20	44
Maidstone	52	3	0	34	89
Medway Towns	12	7	113	582	713
Mid Sussex	1	6	5	23	34
Milton Keynes	64	4	2	41	110
Mole Valley	0	0	0	2	2
New Forest	11	3	0	27	40
Oxford	7	6	5	136	155
Portsmouth	32	8	0	90	130
Reading	1	10	0	175	185
Reigate and Banstead	9	6	1	10	27
Rother	5	2	8	2	17
Runnymede	0	1	0	17	18
Rushmoor	8	1	0	59	68
Sevenoaks	3	0	0	23	26
Shepway	39	88	9	27	163
Slough	17	1	0	58	76
South Buckinghamshire	0	0	0	34	34
South Oxfordshire	12	1	0	7	20
Southampton	10	4	0	154	169
Spelthorne	0	3	0	19	22
Surrey Heath	0	0	0	4	4
Swale	23	11	20	126	180
Tandridge	0	3	4	6	13
Test Valley	8	4	4	5	21
Thanet	4	4	31	76	116
Tonbridge and Malling	7	32	105	192	336

## Appendix 1

### Appendix G continued

Local authority	A	B	C	D	Total A-D
Tunbridge Wells	0	0	0	48	48
Vale of White Horse	16	0	21	64	102
Waverley	4	0	107	18	129
Wealden	11	5	9	23	47
West Berkshire	45	9	1	124	179
West Oxfordshire	1	4	0	0	5
Winchester	6	3	8	14	31
Windsor and Maidenhead	1	3	4	17	24
Woking	0	19	20	8	46
Wokingham	0	0	1	25	26
Worthing	2	1	6	20	28
Wycombe	2	12	2	31	47
<b>London</b>	<b>670</b>	<b>317</b>	<b>255</b>	<b>2,088</b>	<b>3,330</b>
Barking and Dagenham	135	15	7	56	213
Barnet	3	9	16	192	220
Bexley	8	8	20	7	44
Brent	2	17	27	100	147
Bromley	23	0	1	68	92
Camden	0	8	2	28	38
City of London	0	0	0	5	5
Croydon	9	23	14	59	105
Ealing	5	1	1	133	139
Enfield	1	26	13	30	69
Greenwich	87	8	8	21	123
Hackney	0	3	2	5	9
Hammersmith and Fulham	4	2	0	59	64
Haringey	49	6	0	59	113
Harrow	2	0	0	93	94
Havering	26	12	0	210	248
Hillingdon	12	26	3	4	46
Hounslow	0	4	2	56	62
Islington	0	5	0	19	24
Kensington and Chelsea	0	10	1	7	18
Kingston upon Thames	0	1	7	44	52
Lambeth	1	7	1	65	73
Lewisham	34	1	0	62	97
Merton	0	15	0	12	28
Newham	218	26	86	164	496
Redbridge	0	6	0	74	80
Richmond upon Thames	2	18	0	34	54
Southwark	11	1	3	87	102
Sutton	1	3	2	32	37
Tower Hamlets	25	21	20	142	209

**Appendix G continued**

Local authority	A	B	C	D	Total A-D
Waltham Forest	4	1	1	17	23
Wandsworth	3	35	16	69	123
Westminster	5	0	0	77	83

**Appendix H. Number of PDL sites in different size categories by land type from the National Land Use Database in 2010, 2011 and 2012.**

	Size category	A: Previously developed land now vacant	B: Vacant buildings	C: Derelict land and buildings	D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission	Total A-D
2010	0 - 1 ha	4,878	2,809	1,771	7,563	17,021
	1 - 5 ha	1,482	575	937	1,806	4,800
	5 - 20 ha	392	114	335	444	1,285
	20+ ha	97	18	104	121	340
2011	0 - 1 ha	4,429	2,589	1,688	6,956	15,662
	1 - 5 ha	1,446	540	923	1,767	4,676
	5 - 20 ha	374	114	320	444	1,252
	20+ ha	88	16	101	121	326
2012	0 - 1 ha	4,438	2,487	1,682	6,558	15,165
	1 - 5 ha	1,454	526	925	1,679	4,584
	5 - 20 ha	381	114	309	429	1,233
	20+ ha	84	15	103	115	317

**Appendix I. Area of PDL representing the churn in sites across 82 local planning authorities in England between 2010, 2011 and 2012.**

Region	Change in area (ha) between 2010 and 2011			Change in area (ha) between 2011 and 2012		
	Removed	Added	Difference	Removed	Added	Difference
North West	927	718	-12	14	4	-11
North East	85	74	-209	202	185	-17
Yorkshire and The Humber	30	106	16	1065	197	-868
West Midlands	236	99	79	133	135	2
East Midlands	36	116	12	103	188	85
East of England	274	307	-137	144	133	-11
South West	71	83	32	143	97	-47
South East	983	1000	80	104	55	-49
London	10	89	76	41	507	466
England	2,653 ha	2,591 ha	-61 ha	1,949 ha	1,501 ha	-448 ha



## Appendix J. Area of PDL (ha) by planning status from the National Land Use Database in 2010, 2011 and 2012.

Region	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total	
2010	North West	2,951	4,040	1,193	1,278	286	9,747
	North East	715	2,018	363	646	26	3,767
	Yorkshire and The Humber	1,714	1,848	930	784	64	5,340
	West Midlands	1,097	1,286	860	789	78	4,110
	East Midlands	1,462	1,781	575	567	22	4,406
	East of England	755	1,629	1,785	887	131	5,186
	South West	1,342	1,441	458	629	69	3,938
	South East	631	3,796	1,598	1,432	256	7,712
	London	357	2,027	407	496	34	3,322
	England	11,024 ha	19,866 ha	8,169 ha	7,508 ha	966 ha	47,528 ha
2011	North West	2,861	3,867	792	1,325	254	9,098
	North East	679	1,997	384	651	25	3,736
	Yorkshire and The Humber	1,686	1,844	921	771	61	5,282
	West Midlands	1,064	1,266	808	735	75	3,949
	East Midlands	1,234	1,803	570	653	59	4,319
	East of England	763	1,669	1,719	809	153	5,113
	South West	1,295	1,446	454	613	95	3,904
	South East	823	2,809	1,531	1,114	243	6,520
	London	356	2,047	412	502	34	3,350
	England	10,761 ha	18,748 ha	7,591 ha	7,173 ha	999 ha	45,271 ha
2012	North West	2,867	3,840	769	1,312	252	9,041
	North East	627	2,050	384	616	24	3,700
	Yorkshire and The Humber	1,423	2,057	784	822	61	5,146
	West Midlands	1,098	1,255	780	725	68	3,926
	East Midlands	1,334	1,580	541	614	16	4,085
	East of England	727	1,609	1,310	1,395	145	5,187
	South West	1,296	1,467	377	676	101	3,916
	South East	1,445	2,295	1,600	1,208	220	6,768
	London	347	1,968	435	501	43	3,294
	England	11,164 ha	18,121 ha	6,980 ha	7,869 ha	930 ha	45,063 ha

### Appendix K. Area and number of 'hardcore' brownfield sites by land type from the NLUD in 2012.

Region	A: Previously developed land now vacant	B: Vacant buildings	C: Derelict land and buildings	D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission	Total
North West	1,093 (430)	88 (74)	2,461 (407)	527 (116)	4,169 (1027)
North East	636 (233)	28 (48)	472 (64)	287 (47)	1,423 (392)
Yorkshire and The Humber	1,101 (385)	353 (210)	1,066 (199)	547 (185)	3,067 (979)
South West	578 (133)	57 (62)	974 (149)	443 (218)	2,051 (562)
East Midlands	352 (141)	64 (72)	940 (188)	309 (138)	1,664 (539)
East of England	178 (74)	50 (31)	826 (50)	358 (235)	1,412 (390)
West Midlands	428 (303)	78 (82)	712 (230)	216 (103)	1,435 (718)
South East	475 (93)	70 (44)	624 (65)	1,343 (299)	2,513 (501)
London	3 (1)	0	0	6 (5)	9 (6)
England	4,843 ha (1,793)	788 ha (623)	8,076 ha (1,352)	4,035 ha (1,346)	17,743 ha (5,114)

### Appendix L. Area and number of 'hardcore' brownfield sites by planning status in 2012 from the NLUD.

Region	None	With draft allocation or allocated in the Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
North West	1,446 (437)	2,051 (447)	394 (41)	240 (90)	37 (12)	4,169 (1027)
North East	244 (153)	1,014 (187)	80 (11)	77 (38)	8 (3)	1,423 (392)
Yorkshire and The Humber	1,226 (384)	1,176 (297)	435 (102)	218 (179)	13 (17)	3,067 (979)
West Midlands	560 (330)	478 (218)	191 (70)	139 (89)	67 (11)	1,435 (718)
East Midlands	707 (182)	654 (233)	128 (55)	175 (66)	1 (3)	1,664 (539)
East of England	51 (53)	320 (196)	900 (46)	135 (93)	6 (2)	1,412 (390)
South West	1,077 (203)	773 (237)	84 (26)	102 (88)	15 (8)	2,051 (562)
South East	207 (61)	1,090 (292)	1,008 (40)	149 (100)	59 (8)	2,513 (501)
London	0	8 (5)	0	<0.5 (1)	0	9 (6)
England	5,518 ha (1,803)	7,563 ha (2,112)	3,221 ha (391)	1,235 ha (744)	206 ha (64)	17,743 ha (5,114)

### Appendix M. Area (ha) of PDL suitable for housing from the National Land Use Database in 2010, 2011 and 2012.

	Region	Suitable	Not suitable	Don't know	Total
2010	North West	3,470	5,660	618	9,747
	North East	1,845	1,692	230	3,767
	Yorkshire and The Humber	1,794	2,691	855	5,340
	West Midlands	1,894	1,796	440	4,130
	East Midlands	1,713	2,239	454	4,406
	East of England	3,384	1,521	282	5,186
	South West	1,740	1,996	203	3,938
	South East	4,330	2,760	623	7,712
	London	2,613	579	130	3,322
	England	22,783 ha	20,934 ha	3,835 ha	47,548 ha
2011	North West	3,545	5,056	496	9,098
	North East	1,827	1,676	233	3,736
	Yorkshire and The Humber	1,784	2,648	853	5,285
	West Midlands	1,885	1,643	441	3,969
	East Midlands	1,605	2,300	413	4,319
	East of England	3,303	1,051	759	5,113
	South West	1,722	1,983	199	3,904
	South East	3,816	3,125	607	7,548
	London	2,665	588	96	3,350
	England	22,152 ha	20,070 ha	4,097 ha	46,322 ha
2012	North West	3,502	5,030	510	9,042
	North East	1,831	1,668	201	3,700
	Yorkshire and The Humber	1,850	2,525	774	5,149
	West Midlands	1,907	1,591	448	3,946
	East Midlands	1,599	2,085	400	4,085
	East of England	3,748	1,111	329	5,187
	South West	1,800	1,932	185	3,916
	South East	3,800	2,519	449	6,767
	London	2,645	582	102	3,330
	England	22,682 ha	19,043 ha	3,399 ha	45,123 ha

## Appendix N. Area (ha) of PDL suitable for housing for each local authority from the National Land Use Database in 2012.

Local authority	Suitable	Not suitable	Don't know	Total
<b>North West</b>	<b>3,502</b>	<b>5,030</b>	<b>510</b>	<b>9,042</b>
Allerdale	24	484	3	511
Barrow-in-Furness	48	55	6	108
Blackburn with Darwen	92	40	3	135
Blackpool	22	40	0	62
Bolton	72	61	45	178
Burnley	114	52	1	168
Bury	82	210	3	295
Carlisle	26	335	3	364
Cheshire East	155	53	0	208
Cheshire West and Chester	206	1,425	33	1,665
Chorley	56	100	2	158
Copeland	36	140	17	193
Eden	5	1	0	6
Fylde	61	7	7	74
Halton	4	7	0	11
Hyndburn	49	3	1	52
Knowsley	71	69	74	213
Lancaster	40	27	0	68
Liverpool	334	170	9	512
Manchester	371	97	2	470
Oldham	122	124	16	262
Pendle	40	3	3	46
Preston	63	41	12	117
Ribble Valley	6	0	2	7
Rochdale	146	7	23	176
Rossendale	59	15	3	77
Salford	251	198	31	481
Sefton	75	109	0	184
South Lakeland	6	3	0	8
South Ribble	71	38	0	109
St. Helens	71	141	0	212
Stockport	35	83	0	118
Tameside	74	83	44	201
Trafford	33	43	54	131
Warrington	284	90	3	377
West Lancashire	27	69	9	105
Wigan	191	467	0	658

## Appendix 1

### Appendix N continued

Local authority	Suitable	Not suitable	Don't know	Total
Wirral	19	137	35	191
Wyre	61	4	66	131
<b>North East</b>	<b>1,831</b>	<b>1,668</b>	<b>201</b>	<b>3,700</b>
County Durham	533	179	20	732
Darlington	80	67	30	177
Gateshead	126	135	50	312
Hartlepool	74	85	8	167
Middlesbrough	120	39	14	173
Newcastle upon Tyne	277	31	6	314
North Tyneside	23	21	18	63
Northumberland	205	184	33	422
Redcar and Cleveland	37	450	3	491
South Tyneside	29	32	0	61
Stockton-on-Tees	58	331	4	393
Sunderland	268	113	14	395
<b>Yorkshire and The Humber</b>	<b>1,850</b>	<b>2,525</b>	<b>774</b>	<b>5,149</b>
Barnsley	4	165	0	169
Bradford	84	51	0	135
Calderdale	53	14	0	67
Craven	6	0	0	7
Doncaster	105	68	33	206
East Riding of Yorkshire	45	633	0	678
Hambleton	6	0	6	12
Harrogate	14	10	0	23
Kingston Upon Hull	44	143	2	189
Kirklees	153	124	17	294
Leeds	401	541	41	983
North East Lincolnshire	28	44	0	72
North Lincolnshire	227	221	27	474
Richmondshire	24	7	36	67
Rotherham	144	71	20	235
Ryedale	0	0	0	0
Scarborough	18	3	13	35
Selby	31	208	449	687
Sheffield	254	115	127	495
Wakefield	123	87	0	211
York	86	21	4	110
<b>West Midlands</b>	<b>1,906</b>	<b>1,591</b>	<b>448</b>	<b>3,946</b>
Birmingham	183	358	26	566

## Appendix 1

### Appendix N continued

Local authority	Suitable	Not suitable	Don't know	Total
Bromsgrove	45	13	2	60
Cannock Chase	28	88	7	122
Coventry	161	24	0	185
Dudley	117	63	0	180
East Staffordshire	32	7	4	44
Herefordshire	24	3	0	27
Lichfield	19	5	11	35
Malvern Hills	10	3	1	13
Newcastle-under-Lyme	25	63	7	95
North Warwickshire	16	77	21	114
Nuneaton and Bedworth	79	6	8	93
Redditch	1	6	1	8
Rugby	35	52	57	144
Sandwell	105	103	28	236
Shropshire	53	23	10	86
Solihull	17	1	0	18
South Staffordshire	27	57	0	84
Stafford	15	206	0	221
Staffordshire Moorlands	64	40	16	121
Stoke-on-Trent	50	144	168	363
Stratford-on-Avon	124	65	0	190
Tamworth	6	0	6	13
Telford and Wrekin	282	0	58	340
Walsall	76	60	1	138
Warwick	3	10	0	13
Wolverhampton	181	82	0	263
Worcester	13	20	15	48
Wychavon	15	2	1	18
Wyre Forest	101	9	0	110
<b>East Midlands</b>	<b>1,599</b>	<b>2,085</b>	<b>400</b>	<b>4,085</b>
Amber Valley	24	70	9	103
Ashfield	3	6	6	14
Bassetlaw	38	45	5	88
Blaby	22	16	0	38
Bolsover	22	169	0	191
Boston	13	7	0	20
Broxtowe	96	70	0	165
Charnwood	24	35	0	58
Chesterfield	62	137	1	200

**Appendix N continued**

Local authority	Suitable	Not suitable	Don't know	Total
Corby	12	109	34	155
Daventry	2	2	0	3
Derby	65	80	23	167
Derbyshire Dales	21	339	9	369
East Lindsey	15	6	2	23
East Northamptonshire	71	63	1	135
Erewash	13	8	7	28
Gedling	50	0	0	50
Harborough	23	0	0	23
High Peak	47	10	12	69
Hinckley and Bosworth	50	118	0	168
Kettering	12	2	2	17
Leicester	34	43	19	96
Lincoln	20	43	3	65
Mansfield	35	19	4	58
Melton	9	43	0	52
Newark and Sherwood	39	35	10	83
North East Derbyshire	67	33	0	100
North Kesteven	36	11	3	50
North West Leicestershire	16	2	0	18
Northampton	101	6	23	129
Nottingham	241	61	100	403
Oadby and Wigston	0	4	2	6
Rushcliffe	73	11	59	142
Rutland	11	2	6	20
South Derbyshire	49	317	17	383
South Holland	23	22	0	46
South Kesteven	71	24	10	104
South Northamptonshire	9	34	5	48
Wellingborough	36	31	0	67
West Lindsey	48	52	31	130
<b>East of England</b>	<b>3,748</b>	<b>1,111</b>	<b>328</b>	<b>5,187</b>
Babergh	33	14	0	47
Basildon	48	6	0	54
Bedford	118	20	7	145
Braintree	34	5	7	46
Breckland	20	11	8	39
Brentwood	10	3	2	15
Broadland	45	23	0	68



## Appendix 1

### Appendix N continued

Local authority	Suitable	Not suitable	Don't know	Total
Broxbourne	8	2	0	9
Cambridge	21	11	1	33
Castle Point	136	18	0	153
Central Bedfordshire	218	107	4	330
Chelmsford	35	0	1	35
Colchester	163	1	0	164
Dacorum	28	0	0	28
East Cambridgeshire	6	0	3	8
East Hertfordshire	30	1	24	56
Epping Forest	91	83	0	174
Fenland	23	45	9	77
Forest Heath	34	1	14	50
Great Yarmouth	16	1	3	20
Harlow	11	1	18	30
Hertsmere	43	0	2	45
Huntingdonshire	463	13	0	476
Ipswich	66	33	1	101
Kings Lynn and West Norfolk	89	0	27	116
Luton	37	9	7	54
Maldon	0	0	0	0
Mid Suffolk	28	3	1	32
North Hertfordshire	10	0	1	11
North Norfolk	21	47	144	212
Norwich	68	23	1	91
Peterborough	770	31	4	804
Rochford	9	16	0	25
South Cambridgeshire	413	0	0	413
South Norfolk	43	2	1	46
Southend-on-Sea	17	9	0	26
St. Albans	179	0	0	179
St. Edmundsbury	21	50	3	74
Stevenage	16	19	1	36
Suffolk Coastal	42	13	1	55
Tendring	16	0	0	16
Three Rivers	24	0	3	27
Thurrock	107	402	0	509
Uttlesford	11	0	1	12
Watford	30	0	0	30
Waveney	56	81	14	151

## Appendix 1

### Appendix N continued

Local authority	Suitable	Not suitable	Don't know	Total
Welwyn Hatfield	41	7	16	64
<b>South West</b>	<b>1,800</b>	<b>1,932</b>	<b>185</b>	<b>3,916</b>
Bath and North East Somerset	107	4	0	110
Bournemouth	15	3	3	20
Bristol	67	124	26	217
Cheltenham	8	1	0	9
Christchurch	4	90	0	95
Cornwall	200	655	38	894
Cotswold	12	32	1	45
East Devon	1	49	0	50
East Dorset	38	2	0	40
Exeter	84	2	3	89
Forest of Dean	16	24	0	40
Gloucester	40	18	0	57
Mendip	28	10	5	43
Mid Devon	24	0	5	30
North Devon	46	12	0	59
North Dorset	5	4	0	10
North Somerset	292	7	31	331
Plymouth	126	63	26	215
Poole	86	26	12	123
Purbeck	3	5	0	8
Sedgemoor	16	252	1	269
South Gloucestershire	174	90	0	264
South Hams	12	7	0	18
South Somerset	47	25	1	73
Stroud	15	36	1	52
Swindon	35	12	15	63
Taunton Deane	31	9	3	43
Teignbridge	24	23	0	47
Tewkesbury	2	1	1	4
Torbay	47	25	0	72
Torrige	25	67	6	98
West Devon	2	2	3	7
West Dorset	20	5	3	28
West Somerset	7	1	0	9
Weymouth and Portland	25	144	0	169
Wiltshire	115	101	0	216

## Appendix 1

### Appendix N continued

Local authority	Suitable	Not suitable	Don't know	Total
<b>South East</b>	<b>3,800</b>	<b>2,519</b>	<b>449</b>	<b>6,767</b>
Adur	1	6	0	8
Arun	29	0	0	29
Ashford	20	12	15	46
Aylesbury Vale	22	214	4	239
Basingstoke and Deane	20	1	1	22
Bracknell Forest	90	9	18	117
Brighton and Hove	51	3	4	58
Canterbury	61	8	3	72
Cherwell	538	111	15	665
Chichester	53	28	0	81
Chiltern	43	1	1	45
Crawley	0	0	0	0
Dartford	669	167	10	846
Dover	103	183	0	286
East Hampshire	15	21	1	37
Eastbourne	7	4	11	22
Eastleigh	13	0	0	13
Elmbridge	5	0	0	5
Epsom and Ewell	5	0	0	5
Fareham	10	70	0	79
Gosport	34	9	32	75
Gravesham	145	11	0	155
Guildford	71	0	60	131
Hart	24	6	1	30
Hastings	15	0	0	15
Havant	33	7	0	40
Horsham	69	28	1	98
Isle of Wight	16	7	0	23
Lewes	40	3	0	44
Maidstone	62	20	6	89
Medway Towns	127	586	0	713
Mid Sussex	30	4	0	34
Milton Keynes	73	37	0	110
Mole Valley	2	0	0	2
New Forest	13	27	0	40
Oxford	58	45	52	155
Portsmouth	62	26	41	130
Reading	171	7	7	185

## Appendix 1

Reigate and Banstead	18	9	0	27
Rother	6	11	0	17
Runnymede	18	0	0	18
Rushmoor	16	52	0	68
Sevenoaks	11	15	0	26
Shepway	153	8	2	163
Slough	65	10	1	76
South Buckinghamshire	34	0	0	34
South Oxfordshire	20	0	0	20
Southampton	102	58	8	169
Spelthorne	22	1	0	22
Surrey Heath	4	0	0	4
Swale	50	104	27	180
Tandridge	13	0	0	13
Test Valley	8	12	1	21
Thanet	24	90	2	116
Tonbridge and Malling	184	135	17	336
Tunbridge Wells	2	0	47	48
Vale of White Horse	18	84	0	102
Waverley	28	96	6	129
Wealden	22	24	1	47
West Berkshire	65	82	32	179
West Oxfordshire	1	4	0	5
Winchester	18	4	9	31
Windsor and Maidenhead	24	1	0	24
Woking	25	20	1	46
Wokingham	18	0	9	26
Worthing	23	6	0	28
Wycombe	13	32	2	47
<b>London</b>	<b>2,645</b>	<b>582</b>	<b>102</b>	<b>3,330</b>
Barking and Dagenham	213	0	0	213
Barnet	210	6	4	220
Bexley	37	6	0	44
Brent	85	57	5	147
Bromley	54	35	2	92
Camden	32	2	3	38
City of London	0	4	0	5
Croydon	49	56	1	105
Ealing	82	53	4	139
Enfield	31	15	23	69
Greenwich	106	17	0	123

## Appendix 1

### Appendix N continued

Local authority	Suitable	Not suitable	Don't know	Total
Hackney	7	1	1	9
Hammersmith and Fulham	64	0	0	64
Haringey	112	1	0	113
Harrow	82	6	7	94
Havering	150	81	17	248
Hillingdon	27	18	0	46
Hounslow	42	19	1	62
Islington	13	4	7	24
Kensington and Chelsea	17	0	0	18
Kingston upon Thames	25	27	0	52
Lambeth	66	7	0	73
Lewisham	97	0	0	97
Merton	27	1	0	28
Newham	430	60	6	496
Redbridge	58	21	1	80
Richmond upon Thames	46	8	0	54
Southwark	71	29	2	102
Sutton	30	5	1	37
Tower Hamlets	172	30	7	209
Waltham Forest	18	5	1	23
Wandsworth	117	6	0	123
Westminster	76	0	7	83

**Appendix O. Area (ha) of PDL suitable for housing by land type from the National Land Use Database in 2010, 2011 and 2012.**

Region	A: Previously developed land now vacant	B: Vacant buildings	C: Derelict land and buildings	D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission	Total A-D	
2010	North West	1,239	449	832	949	3,470
	North East	729	129	208	779	1,845
	Yorkshire and The Humber	876	165	316	438	1,794
	West Midlands	584	187	535	587	1,894
	East Midlands	552	133	312	716	1,713
	East of England	600	221	1,050	1,512	3,384
	South West	339	135	486	780	1,740
	South East	763	334	577	2,656	4,330
	London	559	274	218	1,562	2,613
England	6,241 ha	2,027 ha	4,534 ha	9,979 ha	22,783 ha	
2011	North West	1,390	387	789	980	3,545
	North East	693	128	202	805	1,827
	Yorkshire and The Humber	865	166	314	439	1,784
	West Midlands	502	196	582	605	1,885
	East Midlands	464	124	291	726	1,605
	East of England	331	211	1,004	1,758	3,303
	South West	209	150	494	869	1,722
	South East	773	333	511	2,199	3,816
	London	557	265	214	1,630	2,665
England	5,784 ha	1,960 ha	4,401 ha	10,011 ha	22,152 ha	
2012	North West	1,379	360	796	966	3,502
	North East	700	124	198	809	1,831
	Yorkshire and The Humber	767	175	305	602	1,850
	West Midlands	528	226	589	564	1,907
	East Midlands	453	122	290	734	1,599
	East of England	1,033	181	959	1,575	3,748
	South West	179	153	502	966	1,800
	South East	752	322	606	2,120	3,800
	London	587	258	200	1,601	2,645
England	6,378 ha	1,921 ha	4,445 ha	9,937 ha	22,682 ha	

**Appendix P. Area (ha) of PDL suitable for housing by planning status from the National Land Use Database in 2010, 2011 and 2012.**

Region	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total	
2010	North West	787	1,027	713	683	260	3,470
	North East	311	657	352	505	20	1,845
	Yorkshire and The Humber	445	479	487	361	22	1,794
	West Midlands	449	561	474	382	27	1,894
	East Midlands	372	706	320	294	22	1,713
	East of England	160	1,300	1,202	598	124	3,384
	South West	219	853	222	381	65	1,740
	South East	190	1,774	1,269	872	225	4,330
	London	300	1,561	317	403	33	2,613
England	3,233 ha	8,918 ha	5,356 ha	4,479 ha	798 ha	22,783 ha	
2011	North West	890	1,001	609	813	232	3,545
	North East	278	665	384	481	20	1,827
	Yorkshire and The Humber	441	484	483	353	19	1,780
	West Midlands	455	613	438	353	25	1,885
	East Midlands	270	659	316	302	59	1,605
	East of England	182	1,280	1,193	505	143	3,303
	South West	201	870	222	367	63	1,722
	South East	378	1,235	1,216	720	243	3,793
	London	299	1,573	354	408	33	2,665
England	3,394 ha	8,380 ha	5,215 ha	4,302 ha	837 ha	22,125 ha	
2012	North West	890	993	592	796	231	3,502
	North East	275	677	384	476	20	1,831
	Yorkshire and The Humber	368	650	347	463	19	1,847
	West Midlands	476	627	434	352	18	1,907
	East Midlands	327	655	315	287	16	1,599
	East of England	136	1,214	1,169	1,087	142	3,748
	South West	192	979	177	369	84	1,800
	South East	437	1,171	1,278	698	216	3,800
	London	291	1,493	381	410	36	2,610
England	3,392 ha	8,459 ha	5,077 ha	4,938 ha	782 ha	22,644 ha	

## Appendix Q. Area (ha) of PDL suitable for housing by planning status for each local authority from the National Land Use Database in 2012.

Local authority	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
<b>North West</b>	<b>890</b>	<b>993</b>	<b>592</b>	<b>796</b>	<b>231</b>	<b>3,502</b>
Allerdale	10	8	3	2	0	24
Barrow-in-Furness	1	43	1	3	0	48
Blackburn with Darwen	62	12	5	13	0	92
Blackpool	4	14	3	1	0	22
Bolton	6	31	3	31	0	72
Burnley	23	11	64	17	0	114
Bury	6	20	47	8	0	82
Carlisle	5	7	3	7	4	26
Cheshire East	16	68	37	11	23	155
Cheshire West and Chester	16	60	25	35	70	206
Chorley	1	0	36	19	0	56
Copeland	9	14	7	7	0	36
Eden	2	1	0	2	0	5
Fylde	27	1	18	9	5	61
Halton	1	0	0	2	0	4
Hyndburn	4	39	5	1	0	49
Knowsley	31	28	4	8	0	71
Lancaster	0	28	0	1	11	40
Liverpool	190	13	61	65	5	334
Manchester	22	118	56	99	76	371
Oldham	25	60	19	13	6	122
Pendle	24	7	3	6	0	40
Preston	10	0	32	10	11	63
Ribble Valley	0	0	0	5	1	6
Rochdale	24	47	44	31	0	146
Rossendale	50	0	5	4	0	59
Salford	110	55	31	55	0	251
Sefton	2	50	12	12	0	75
South Lakeland	3	0	0	3	0	6
South Ribble	13	57	0	0	0	71
St. Helens	42	14	3	11	0	71
Stockport	3	11	0	11	10	35
Tameside	9	19	10	26	10	74
Trafford	0	16	10	7	0	33
Warrington	29	0	28	227	0	284
West Lancashire	11	6	0	10	0	27
Wigan	96	72	5	19	0	191
Wirral	0	17	0	1	0	19
Wyre	2	45	9	4	0	61
<b>North East</b>	<b>275</b>	<b>677</b>	<b>383</b>	<b>476</b>	<b>19</b>	<b>1,831</b>
County Durham	82	120	52	280	0	533
Darlington	2	32	20	16	11	80
Gateshead	47	71	4	4	0	126
Hartlepool	8	27	27	13	0	74



## Appendix 1

### Appendix Q continued

Local authority	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
Middlesbrough	1	70	32	17	0	120
Newcastle upon Tyne	68	121	57	25	5	277
North Tyneside	3	1	6	14	0	23
Northumberland	8	125	36	36	0	205
Redcar and Cleveland	19	12	3	4	0	37
South Tyneside	0	28	0	1	0	29
Stockton-on-Tees	1	24	18	14	0	58
Sunderland	35	48	130	51	3	268
<b>Yorkshire and The Humber</b>	<b>368</b>	<b>650</b>	<b>347</b>	<b>463</b>	<b>19</b>	<b>1,850</b>
Barnsley	0	3	0	1	0	4
Bradford	22	0	26	36	0	84
Calderdale	20	17	8	9	0	53
Craven	1	0	1	4	0	6
Doncaster	18	8	46	33	0	105
East Riding of Yorkshire	3	14	10	17	0	45
Hambleton	0	6	0	0	0	6
Harrogate	13	0	0	1	0	14
Kingston Upon Hull	9	18	4	13	1	44
Kirklees	27	35	46	44	0	153
Leeds	106	141	58	85	10	401
North East Lincolnshire	6	12	0	9	0	28
North Lincolnshire	25	171	5	25	0	227
Richmondshire	4	0	19	1	0	24
Rotherham	15	13	0	116	0	144
Ryedale	0	0	0	0	0	0
Scarborough	2	13	0	4	0	18
Selby	1	0	14	8	8	31
Sheffield	67	127	17	43	0	254
Wakefield	4	29	82	9	0	123
York	23	44	10	5	0	86
<b>West Midlands</b>	<b>476</b>	<b>627</b>	<b>434</b>	<b>352</b>	<b>18</b>	<b>1,906</b>
Birmingham	4	51	61	62	5	183
Bromsgrove	23	17	0	0	4	45
Cannock Chase	11	14	1	2	0	28
Coventry	1	30	60	69	0	161
Dudley	47	49	7	14	0	117
East Staffordshire	6	14	9	1	1	32
Herefordshire	5	17	0	3	0	24
Lichfield	15	3	0	1	0	19
Malvern Hills	1	2	6	1	0	10
Newcastle-under-Lyme	13	0	8	4	0	25
North Warwickshire	4	7	3	2	0	16
Nuneaton and Bedworth	60	2	4	13	0	79
Redditch	0	0	1	0	0	1
Rugby	0	34	0	0	0	35
Sandwell	4	68	16	17	0	105
Shropshire	8	16	14	15	0	53
Solihull	4	3	1	9	0	17
South Staffordshire	5	0	0	22	0	27

## Appendix 1

### Appendix Q continued

Local authority	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
Stafford	3	0	5	7	0	15
Staffordshire Moorlands	19	29	7	8	1	64
Stoke-on-Trent	0	0	37	14	0	50
Stratford-on-Avon	3	36	74	7	4	124
Tamworth	0	2	3	1	0	6
Telford and Wrekin	171	12	62	35	1	282
Walsall	28	32	1	15	0	76
Warwick	0	2	0	1	0	3
Wolverhampton	37	83	43	19	0	181
Worcester	0	3	7	3	0	13
Wychavon	1	8	1	4	1	15
Wyre Forest	2	91	5	2	0	101
<b>East Midlands</b>	<b>327</b>	<b>655</b>	<b>315</b>	<b>287</b>	<b>16</b>	<b>1,599</b>
Amber Valley	1	11	2	9	0	24
Ashfield	1	0	2	0	0	3
Bassetlaw	33	2	0	3	0	38
Blaby	0	15	1	6	0	22
Bolsover	7	1	3	11	0	22
Boston	2	2	3	6	0	13
Broxtowe	28	52	6	9	0	96
Charnwood	12	6	1	5	0	24
Chesterfield	22	32	3	5	0	62
Corby	1	4	0	2	5	12
Daventry	1	0	0	1	0	2
Derby	2	57	1	4	0	65
Derbyshire Dales	16	0	0	5	0	21
East Lindsey	7	1	1	6	0	15
East Northamptonshire	9	4	45	13	0	71
Erewash	12	0	0	1	0	13
Gedling	39	0	2	8	0	50
Harborough	6	0	5	12	0	23
High Peak	3	42	0	2	0	47
Hinckley and Bosworth	17	3	11	18	0	50
Kettering	4	1	2	4	1	12
Leicester	5	11	2	14	1	34
Lincoln	18	0	0	1	0	20
Mansfield	3	7	7	18	0	35
Melton	3	0	0	6	0	9
Newark and Sherwood	0	2	21	16	0	39
North East Derbyshire	3	53	1	9	0	67
North Kesteven	19	0	14	3	0	36
North West Leicestershire	10	1	4	1	0	16
Northampton	2	43	31	26	0	101
Nottingham	1	211	21	7	0	241
Oadby and Wigston	0	0	0	0	0	0
Rushcliffe	4	0	54	14	0	73
Rutland	2	0	4	3	2	11
South Derbyshire	0	0	42	6	0	49
South Holland	15	3	2	3	0	23

## Appendix 1

### Appendix Q continued

Local authority	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
South Kesteven	6	40	9	16	0	71
South Northamptonshire	0	0	4	1	4	9
Wellingborough	2	31	0	1	2	36
West Lindsey	8	21	10	9	0	48
<b>East of England</b>	<b>136</b>	<b>1,213</b>	<b>1,169</b>	<b>1,087</b>	<b>142</b>	<b>3,748</b>
Babergh	1	2	30	0	0	33
Basildon	1	38	1	6	0	48
Bedford	5	17	90	3	5	118
Braintree	1	15	6	12	0	34
Breckland	3	1	4	13	0	20
Brentwood	0	1	3	6	0	10
Broadland	0	11	1	34	0	45
Broxbourne	0	5	0	2	0	8
Cambridge	0	5	5	9	2	21
Castle Point	0	133	0	2	0	136
Central Bedfordshire	5	40	47	32	93	218
Chelmsford	0	31	3	0	0	35
Colchester	0	5	102	56	0	163
Dacorum	0	10	1	4	13	28
East Cambridgeshire	2	3	0	0	0	6
East Hertfordshire	11	10	0	7	2	30
Epping Forest	0	1	7	83	0	91
Fenland	1	2	12	8	0	23
Forest Heath	3	15	5	10	0	34
Great Yarmouth	11	2	3	0	0	16
Harlow	1	9	0	1	0	11
Hertsmere	0	36	6	1	0	43
Huntingdonshire	23	22	1	416	0	463
Ipswich	2	50	1	12	1	66
Kings Lynn and West Norfolk	6	13	43	27	0	89
Luton	13	17	3	4	0	37
Maldon	0	0	0	0	0	0
Mid Suffolk	12	13	3	1	0	28
North Hertfordshire	0	4	3	3	0	10
North Norfolk	0	14	2	5	0	21
Norwich	0	34	18	10	5	68
Peterborough	1	50	716	4	0	770
Rochford	1	3	1	4	0	9
South Cambridgeshire	0	389	14	2	9	413
South Norfolk	3	1	11	28	0	43
Southend-on-Sea	2	7	1	7	0	17
St. Albans	0	0	0	179	0	179
St. Edmundsbury	2	16	0	3	0	21
Stevenage	0	3	0	6	7	16
Suffolk Coastal	0	1	5	35	1	42
Tendring	0	12	3	1	0	16
Three Rivers	4	20	0	1	0	24
Thurrock	7	49	14	37	0	107
Uttlesford	7	1	1	1	1	11

## Appendix 1

### Appendix Q continued

Local authority	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
Watford	2	21	4	4	0	30
Waveney	2	51	0	3	0	56
Welwyn Hatfield	2	29	1	6	4	41
<b>South West</b>	<b>192</b>	<b>979</b>	<b>177</b>	<b>369</b>	<b>84</b>	<b>1,800</b>
Bath and North East Somerset	7	53	20	8	19	107
Bournemouth	1	3	4	7	0	15
Bristol	29	7	7	12	12	67
Cheltenham	0	7	0	0	0	8
Christchurch	0	3	1	0	0	4
Cornwall	30	74	18	78	0	200
Cotswold	0	7	4	1	0	12
East Devon	1	0	0	0	0	1
East Dorset	0	0	3	34	0	38
Exeter	26	17	1	34	5	84
Forest of Dean	1	6	1	9	0	16
Gloucester	0	25	0	3	11	40
Mendip	8	3	8	10	0	28
Mid Devon	0	18	2	5	0	24
North Devon	1	42	0	2	1	46
North Dorset	0	1	0	5	0	5
North Somerset	8	245	38	2	0	292
Plymouth	2	91	5	27	0	126
Poole	14	51	1	19	0	86
Purbeck	0	2	0	1	0	3
Sedgemoor	4	12	0	0	0	16
South Gloucestershire	8	151	13	2	0	174
South Hams	4	1	0	0	6	12
South Somerset	1	6	6	34	0	47
Stroud	5	6	2	2	0	15
Swindon	3	17	1	15	0	35
Taunton Deane	1	21	6	3	0	31
Teignbridge	14	5	0	0	4	24
Tewkesbury	0	1	0	2	0	2
Torbay	0	7	28	12	0	47
Torridge	1	6	0	8	10	25
West Devon	1	1	0	0	0	2
West Dorset	0	15	1	4	0	20
West Somerset	2	0	2	3	0	7
Weymouth and Portland	5	4	5	10	0	25
Wiltshire	12	70	3	16	15	115
<b>South East</b>	<b>437</b>	<b>1,171</b>	<b>1,278</b>	<b>698</b>	<b>216</b>	<b>3,800</b>
Adur	0	0	0	1	0	1
Arun	26	2	0	1	0	29
Ashford	0	6	10	0	4	20
Aylesbury Vale	6	4	3	6	2	22
Basingstoke and Deane	6	11	0	2	0	20
Bracknell Forest	0	6	44	41	0	90
Brighton and Hove	1	44	0	5	0	51
Canterbury	0	55	1	5	0	61

## Appendix 1

### Appendix Q continued

Local authority	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
Cherwell	7	19	507	6	0	538
Chichester	0	2	2	47	1	53
Chiltern	1	1	9	32	0	43
Crawley	0	0	0	0	0	0
Dartford	170	35	396	2	67	669
Dover	4	57	7	35	0	103
East Hampshire	1	9	4	0	0	15
Eastbourne	4	0	0	2	0	7
Eastleigh	0	10	3	0	0	13
Elmbridge	0	5	0	0	0	5
Epsom and Ewell	0	1	0	4	0	5
Fareham	3	2	2	3	0	10
Gosport	5	24	1	4	0	34
Gravesham	16	122	1	6	0	145
Guildford	0	10	4	56	0	71
Hart	0	23	0	0	0	24
Hastings	1	4	5	2	2	15
Havant	1	19	3	1	9	33
Horsham	0	53	0	16	0	69
Isle of Wight	2	4	5	5	0	16
Lewes	2	13	3	22	0	40
Maidstone	33	5	6	18	0	62
Medway Towns	34	2	83	8	0	127
Mid Sussex	1	13	3	13	0	30
Milton Keynes	4	49	9	9	3	73
Mole Valley	0	0	0	2	0	2
New Forest	0	4	3	6	0	13
Oxford	0	48	1	8	0	58
Portsmouth	1	36	15	10	0	62
Reading	0	91	6	42	33	171
Reigate and Banstead	6	2	1	8	0	18
Rother	0	6	0	0	0	6
Runnymede	18	0	0	0	0	18
Rushmoor	2	1	0	14	0	16
Sevenoaks	0	4	1	5	0	11
Shepway	10	64	4	7	68	153
Slough	10	38	12	3	2	65
South Buckinghamshire	0	0	5	30	0	34
South Oxfordshire	0	13	0	5	2	20
Southampton	0	89	0	12	1	102
Spelthorne	1	15	3	1	2	22
Surrey Heath	0	2	0	1	0	4
Swale	11	25	8	5	0	50
Tandridge	1	4	3	5	0	13
Test Valley	2	0	1	5	0	8
Thanet	2	11	7	4	0	24
Tonbridge and Malling	32	38	57	45	12	184
Tunbridge Wells	0	2	0	0	0	2
Vale of White Horse	0	15	0	3	0	18

## Appendix 1

### Appendix Q continued

Local authority	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
Waverley	1	19	0	8	0	28
Wealden	6	7	1	8	0	22
West Berkshire	0	2	11	51	1	65
West Oxfordshire	0	1	0	0	0	1
Winchester	1	3	3	11	0	18
Windsor and Maidenhead	2	2	1	18	0	24
Woking	0	0	1	24	0	25
Wokingham	0	16	1	1	0	18
Worthing	2	0	15	3	2	23
Wycombe	0	5	3	1	4	13
<b>London</b>	<b>291</b>	<b>1,492</b>	<b>381</b>	<b>410</b>	<b>36</b>	<b>2,645</b>
Barking and Dagenham	82	20	53	51	6	213
Barnet	4	108	57	40	1	210
Bexley	0	26	7	5	0	37
Brent	0	82	0	1	1	85
Bromley	1	24	11	19	0	54
Camden	0	21	0	11	0	32
City of London	0	0	0	0	0	0
Croydon	0	13	8	25	3	49
Ealing	0	82	0	0	0	82
Enfield	23	1	3	4	0	31
Greenwich	1	16	48	41	0	106
Hackney	2	0	0	5	0	7
Hammersmith and Fulham	1	0	0	28	0	64
Haringey	0	101	0	11	0	112
Harrow	0	45	34	3	0	82
Havering	12	102	5	18	11	150
Hillingdon	1	20	7	0	0	27
Hounslow	2	37	0	3	0	42
Islington	0	2	0	11	0	13
Kensington and Chelsea	1	10	2	4	1	17
Kingston upon Thames	0	17	3	5	0	25
Lambeth	3	51	0	12	0	66
Lewisham	0	84	7	5	0	97
Merton	0	20	0	7	0	27
Newham	148	191	88	3	0	430
Redbridge	4	22	4	29	0	58
Richmond upon Thames	0	25	0	21	0	46
Southwark	0	57	3	10	0	71
Sutton	1	24	1	5	0	30
Tower Hamlets	2	148	5	14	3	172
Waltham Forest	2	10	0	0	5	18
Wandsworth	0	64	35	13	5	117
Westminster	0	69	0	7	0	76

**Appendix R. Area (ha) and number of hardcore sites in 2012 suitable for housing by planning status from the NLUD.**

Region	None	With draft allocation or allocated in the Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
North West	200 (239)	336 (203)	121 (29)	58 (50)	34 (10)	750 (531)
North East	66 (83)	217 (80)	78 (8)	64 (27)	4 (1)	428 (199)
Yorkshire and The Humber	217 (166)	258 (139)	71 (55)	123 (108)	10 (12)	680 (480)
West Midlands	274 (190)	172 (103)	118 (32)	31 (42)	18 (10)	613 (377)
East Midlands	73 (65)	271 (95)	30 (38)	46 (43)	1 (3)	419 (244)
East of England	23 (31)	215 (143)	858 (39)	84 (74)	6 (2)	1,187 (289)
South West	73 (79)	476 (172)	69 (22)	36 (73)	15 (8)	670 (354)
South East	15 (17)	500 (170)	876 (26)	77 (72)	59 (8)	1,526 (293)
London	0	8 (4)	0	0 (1)	0	8 (5)
England	941 ha (870)	2,454 ha (1,109)	2,219 ha (249)	520 ha (490)	147 ha (54)	6,280 ha (2,772)

**Appendix S. Area (ha) of PDL suitable for housing representing the churn in sites across 82 local planning authorities in England between 2010, 2011 and 2012.**

Region	Change in area (ha) between 2010 and 2011			Change in area (ha) between 2011 and 2012		
	Removed	Added	Difference	Removed	Added	Difference
North West	75	60	-15	12	4	-8
North East	355	316	-39	78	39	-39
Yorkshire and The Humber	221	142	-79	117	53	-64
West Midlands	9	82	73	127	120	-7
East Midlands	30	47	18	32	167	135
East of England	121	55	-66	101	97	-5
South West	202	224	22	81	48	-33
South East	20	30	10	39	17	-22
London	20	23	3	19	203	184
England	1,052 ha	979 ha	-73 ha	606 ha	746 ha	140 ha



Appendix 1

**Appendix T. Area (ha) of PDL by proposed use for each local authority from the National Land Use Database in 2012.**

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
North West	2,223	2,771	77	1,180	1,113	116	784	779	9,042
Allerdale	20	57	1	10	3	0	3	418	511
Barrow-in-Furness	19	35	0	21	26	2	0	4	108
Blackburn with Darwen	0	40	1	82	5	1	0	6	135
Blackpool	2	18	0	6	11	19	0	6	62
Bolton	42	73	5	27	16	0	0	15	178
Burnley	14	46	4	41	46	2	9	6	168
Bury	111	39	1	28	48	9	0	60	295
Carlisle	69	267	3	20	3	0	0	2	364
Cheshire East	41	27	2	73	61	0	0	4	208
Cheshire West and Chester	599	845	11	67	116	1	0	25	1,665
Chorley	45	9	0	16	40	0	47	3	158
Copeland	92	68	1	27	0	2	0	1	193
Eden	2	0	0	4	0	0	0	0	6
Fylde	36	4	0	32	1	1	0	1	74
Halton	7	0	1	2	0	0	0	0	11
Hyndburn	5	28	3	15	0	0	0	2	52
Knowsley	70	71	0	60	0	0	8	4	213
Lancaster	8	20	0	24	13	0	0	2	68
Liverpool	229	110	7	44	95	2	12	14	512
Manchester	22	73	5	98	211	26	2	35	470
Oldham	32	53	5	40	61	1	65	5	262
Pendle	19	5	0	19	1	0	0	2	46
Preston	30	7	3	41	6	0	21	8	117

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Ribble Valley	1	0	1	5	0	0	0	0	7
Rochdale	28	29	0	68	51	0	1	0	176
Rossendale	46	13	0	8	0	0	11	0	77
Salford	166	148	4	60	72	1	27	3	481
Sefton	2	61	3	45	28	5	0	40	184
South Lakeland	2	2	0	3	1	0	0	0	8
South Ribble	17	19	0	0	54	12	3	3	109
St. Helens	136	30	3	19	5	10	8	0	212
Stockport	3	34	1	18	14	4	37	8	118
Tameside	69	11	7	28	26	10	30	19	201
Trafford	2	73	1	30	2	2	0	22	131
Warrington	80	250	1	38	8	0	0	0	377
West Lancashire	29	24	1	10	8	0	20	13	105
Wigan	99	19	1	19	41	0	471	8	658
Wirral	24	94	0	12	6	7	10	38	191
Wyre	2	70	0	24	33	0	0	3	131
<b>North East</b>	<b>522</b>	<b>1,398</b>	<b>29</b>	<b>609</b>	<b>849</b>	<b>33</b>	<b>155</b>	<b>105</b>	<b>3,700</b>
County Durham	140	156	10	142	274	3	5	1	732
Darlington	2	111	0	22	25	1	3	12	177
Gateshead	107	76	9	60	45	1	3	11	312
Hartlepool	37	38	0	40	31	9	0	11	167
Middlesbrough	4	18	7	24	108	11	0	0	173
Newcastle upon Tyne	48	83	0	69	99	5	0	10	314
North Tyneside	20	18	0	20	0	0	1	4	63
Northumberland	18	191	3	68	93	0	12	37	422
Redcar and Cleveland	15	447	0	18	10	0	0	1	491
South Tyneside	0	20	0	5	19	0	16	0	61

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Stockton-on-Tees	90	122	0	38	20	0	115	8	393
Sunderland	39	116	0	103	125	1	0	10	395
<b>Yorkshire and The Humber</b>	<b>1,407</b>	<b>1,594</b>	<b>28</b>	<b>677</b>	<b>388</b>	<b>149</b>	<b>50</b>	<b>852</b>	<b>5,149</b>
Barnsley	0	163	0	4	0	0	0	2	169
Bradford	0	51	0	84	0	0	0	0	135
Calderdale	10	11	1	19	19	4	2	1	67
Craven	0	1	0	3	3	0	0	0	7
Doncaster	33	68	0	48	0	57	1	1	206
East Riding of Yorkshire	192	186	1	27	12	3	13	244	678
Hambleton	0	2	0	0	6	1	0	0	12
Harrogate	13	3	0	1	0	0	0	7	23
Kingston Upon Hull	71	49	1	22	10	0	0	35	189
Kirklees	30	51	0	118	1	3	25	66	294
Leeds	285	434	12	70	89	13	9	71	983
North East Lincolnshire	9	7	0	22	1	32	0	0	72
North Lincolnshire	43	341	2	43	15	1	0	29	474
Richmondshire	38	9	0	1	19	1	0	0	67
Rotherham	17	61	2	12	117	26	0	1	235
Ryedale	0	0	0	0	0	0	0	0	0
Scarborough	3	2	3	7	0	2	0	18	35
Selby	259	28	0	28	1	6	0	365	687
Sheffield	363	33	5	75	16	1	0	2	495
Wakefield	8	83	0	75	34	0	0	10	211
York	35	11	1	19	44	0	0	0	110
<b>West Midlands</b>	<b>980</b>	<b>921</b>	<b>92</b>	<b>849</b>	<b>585</b>	<b>296</b>	<b>98</b>	<b>123</b>	<b>3,946</b>
Birmingham	49	155	52	133	45	38	50	44	566
Bromsgrove	27	10	0	21	1	0	0	1	60

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Cannock Chase	79	9	4	24	1	6	0	0	122
Coventry	3	22	0	105	54	0	0	1	185
Dudley	0	34	14	108	10	0	5	9	180
East Staffordshire	11	6	0	11	12	0	0	4	44
Herefordshire	5	4	1	12	5	0	0	1	27
Lichfield	7	5	0	15	7	0	0	0	35
Malvern Hills	2	3	0	9	0	0	0	0	13
Newcastle-under-Lyme	25	55	0	12	0	0	0	3	95
North Warwickshire	41	61	0	11	1	0	0	0	114
Nuneaton and Bedworth	73	8	0	11	0	0	0	0	93
Redditch	4	2	0	1	0	0	0	0	8
Rugby	0	108	1	0	35	0	0	0	144
Sandwell	6	71	0	115	18	16	0	10	236
Shropshire	24	15	1	25	13	8	0	1	86
Solihull	4	0	0	12	1	1	0	0	18
South Staffordshire	19	42	0	21	1	0	0	1	84
Stafford	78	131	0	7	5	0	0	0	221
Staffordshire Moorlands	27	12	2	14	34	2	0	31	121
Stoke-on-Trent	161	9	14	50	0	121	0	8	363
Stratford-on-Avon	12	27	0	12	102	36	0	1	190
Tamworth	1	6	0	6	0	0	0	0	13
Telford and Wrekin	227	0	0	28	47	0	36	2	340
Walsall	41	2	0	21	2	68	4	0	138
Warwick	0	10	0	0	3	0	0	0	13
Wolverhampton	52	63	3	37	100	0	3	5	263
Worcester	0	33	0	13	0	0	0	2	48
Wychavon	1	8	1	4	3	0	0	0	18

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Wyre Forest	2	10	0	13	86	0	0	0	110
<b>East Midlands</b>	<b>1,171</b>	<b>1,000</b>	<b>35</b>	<b>619</b>	<b>667</b>	<b>143</b>	<b>111</b>	<b>339</b>	<b>4,085</b>
Amber Valley	36	23	0	15	9	20	0	0	103
Ashfield	5	4	3	2	0	0	0	0	14
Bassetlaw	21	41	0	26	0	0	0	0	88
Blaby	0	30	0	7	0	0	0	0	38
Bolsover	61	63	2	16	0	0	2	48	191
Boston	4	5	1	7	1	0	0	1	20
Broxtowe	68	29	0	52	6	0	6	3	165
Charnwood	15	1	0	7	5	0	18	12	58
Chesterfield	55	69	0	13	24	9	8	21	200
Corby	61	79	0	9	3	0	0	2	155
Daventry	1	2	0	1	0	0	0	0	3
Derby	24	82	3	20	39	0	0	0	167
Derbyshire Dales	308	27	1	1	25	0	4	3	369
East Lindsey	13	1	0	7	1	0	0	1	23
East Northamptonshire	10	33	0	21	43	2	0	26	135
Erewash	19	9	0	0	0	0	0	0	28
Gedling	0	0	0	49	0	0	0	0	50
Harborough	6	0	0	16	0	0	0	0	23
High Peak	0	36	0	22	9	1	0	0	69
Hinckley and Bosworth	26	0	0	29	3	14	48	49	168
Kettering	6	1	0	8	0	0	0	1	17
Leicester	11	37	0	10	16	4	0	18	96
Lincoln	36	3	0	0	0	0	24	1	65
Mansfield	8	23	0	24	2	0	0	1	58
Melton	6	40	0	6	0	0	0	0	52

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Newark and Sherwood	4	40	1	38	0	0	0	0	83
North East Derbyshire	9	27	0	7	57	0	0	0	100
North Kesteven	15	0	4	12	17	0	0	1	50
North West Leicestershire	10	1	1	5	1	0	0	0	18
Northampton	25	33	2	36	30	0	0	2	129
Nottingham	12	33	9	26	214	89	0	20	403
Oadby and Wigston	1	5	0	0	0	0	0	0	6
Rushcliffe	38	36	0	18	50	0	0	0	142
Rutland	1	2	0	10	0	0	0	6	20
South Derbyshire	188	56	1	7	40	0	0	91	383
South Holland	7	6	3	15	0	0	0	14	46
South Kesteven	15	26	0	33	31	0	0	0	104
South Northamptonshire	0	38	1	6	3	0	0	0	48
Wellingborough	4	27	1	7	24	1	0	2	67
West Lindsey	41	33	0	28	11	2	0	15	130
<b>East of England</b>	<b>370</b>	<b>789</b>	<b>38</b>	<b>1,256</b>	<b>2,325</b>	<b>167</b>	<b>9</b>	<b>233</b>	<b>5,187</b>
Babergh	2	4	4	32	0	0	0	5	47
Basildon	0	5	1	6	40	1	0	0	54
Bedford	0	17	0	20	98	0	0	10	145
Braintree	5	9	0	29	4	0	0	0	46
Breckland	2	4	0	16	6	0	0	9	39
Brentwood	0	4	0	9	1	1	0	0	15
Broadland	0	9	0	41	4	0	0	14	68
Broxbourne	0	0	1	7	1	1	0	0	9
Cambridge	8	3	0	16	1	0	0	4	33
Castle Point	0	19	0	106	29	0	0	0	153
Central Bedfordshire	14	43	3	84	126	59	1	0	330

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Chelmsford	0	2	1	21	12	0	0	0	35
Colchester	0	0	1	68	32	63	0	0	164
Dacorum	0	2	0	12	14	0	0	0	28
East Cambridgeshire	2	3	0	4	0	0	0	0	8
East Hertfordshire	14	1	0	18	12	11	0	0	56
Epping Forest	0	19	3	89	2	1	0	60	174
Fenland	12	37	1	22	1	4	0	1	77
Forest Heath	14	0	1	31	3	0	0	0	50
Great Yarmouth	1	1	0	4	12	0	0	2	20
Harlow	18	0	0	2	8	0	0	2	30
Hertsmere	0	3	0	36	6	0	0	0	45
Huntingdonshire	4	7	0	15	444	2	0	3	476
Ipswich	5	31	0	20	42	2	0	0	101
Kings Lynn and West Norfolk	29	5	0	35	44	1	0	2	116
Luton	19	17	0	12	1	2	2	1	54
Maldon	0	0	0	0	0	0	0	0	0
Mid Suffolk	13	1	1	2	14	0	0	0	32
North Hertfordshire	5	0	0	5	1	0	0	0	11
North Norfolk	100	45	0	13	9	8	0	37	212
Norwich	1	14	2	20	45	9	0	0	91
Peterborough	1	28	9	13	753	0	0	0	804
Rochford	11	6	0	7	1	0	0	1	25
South Cambridgeshire	0	0	0	10	403	0	0	0	413
South Norfolk	4	0	0	32	8	2	0	0	46
Southend-on-Sea	0	9	0	8	8	0	0	0	26
St. Albans	0	0	0	179	0	0	0	0	179
St. Edmundsbury	1	42	0	17	4	1	0	9	74

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Stevenage	0	18	4	11	0	0	0	2	36
Suffolk Coastal	1	8	6	39	2	0	0	0	55
Tendring	0	1	0	8	8	0	0	0	16
Three Rivers	6	1	0	5	14	0	0	1	27
Thurrock	12	322	0	101	5	0	5	64	509
Uttlesford	7	1	0	2	1	0	0	1	12
Watford	0	0	0	8	19	0	0	3	30
Waveney	56	26	1	6	60	0	1	1	151
Welwyn Hatfield	2	23	0	13	26	0	0	0	64
<b>South West</b>	<b>1,219</b>	<b>637</b>	<b>25</b>	<b>609</b>	<b>914</b>	<b>267</b>	<b>22</b>	<b>216</b>	<b>3,916</b>
Bath and North East Somerset	1	2	0	7	100	1	0	0	110
Bournemouth	2	0	2	9	5	2	0	1	20
Bristol	33	72	6	12	47	5	0	42	217
Cheltenham	0	1	0	1	6	0	0	0	9
Christchurch	2	88	0	1	3	1	0	0	95
Cornwall	661	68	1	122	33	2	0	6	894
Cotswold	21	8	1	4	10	0	0	0	45
East Devon	0	49	0	0	1	0	0	0	50
East Dorset	0	0	0	38	0	0	0	2	40
Exeter	30	2	0	51	6	0	0	0	89
Forest of Dean	8	16	0	13	2	0	0	0	40
Gloucester	0	18	0	8	31	0	0	1	57
Mendip	5	11	3	13	9	2	0	1	43
Mid Devon	0	5	1	24	0	0	0	0	30
North Devon	2	0	0	12	33	12	0	0	59
North Dorset	1	3	1	4	0	0	0	1	10
North Somerset	9	85	0	8	199	0	0	30	331



## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Plymouth	27	11	0	25	103	0	0	47	215
Poole	15	24	0	17	24	0	0	44	123
Purbeck	5	0	0	1	2	0	0	0	8
Sedgemoor	253	2	0	12	0	0	1	0	269
South Gloucestershire	2	36	4	15	157	30	0	19	264
South Hams	6	5	1	1	6	0	0	0	18
South Somerset	3	22	0	38	7	0	0	2	73
Stroud	6	38	0	5	2	0	0	0	52
Swindon	25	0	3	23	7	0	0	4	63
Taunton Deane	4	5	1	8	23	2	0	1	43
Teignbridge	15	9	0	5	5	0	2	11	47
Tewkesbury	2	0	0	1	0	0	0	1	4
Torbay	0	7	0	42	5	0	18	0	72
Torridge	4	4	0	22	1	66	0	2	98
West Devon	2	2	1	2	0	0	0	0	7
West Dorset	0	4	0	8	12	3	0	1	28
West Somerset	3	2	0	5	0	0	0	0	9
Weymouth and Portland	5	1	0	10	10	142	0	1	169
Wiltshire	66	39	0	41	62	0	0	0	216
<b>South East</b>	<b>474</b>	<b>1,891</b>	<b>68</b>	<b>1,329</b>	<b>2,229</b>	<b>151</b>	<b>36</b>	<b>587</b>	<b>6,767</b>
Adur	0	0	0	1	1	0	2	4	8
Arun	26	0	0	3	0	0	0	0	29
Ashford	9	1	0	2	29	4	0	2	46
Aylesbury Vale	6	209	2	13	6	3	0	0	239
Basingstoke and Deane	4	0	0	4	11	1	0	1	22
Bracknell Forest	3	14	6	44	46	0	0	4	117
Brighton and Hove	6	5	0	7	36	0	0	4	58

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Canterbury	0	3	0	17	45	0	1	6	72
Cherwell	77	19	0	5	527	34	0	2	665
Chichester	8	18	1	42	0	8	0	5	81
Chiltern	2	0	0	42	0	0	0	0	45
Crawley	0	0	0	0	0	0	0	0	0
Dartford	24	128	0	118	538	0	0	38	846
Dover	0	151	0	55	47	0	27	5	286
East Hampshire	20	2	1	13	0	0	0	1	37
Eastbourne	0	14	0	6	0	3	0	0	22
Eastleigh	0	0	0	13	0	0	0	0	13
Elmbridge	0	0	0	5	0	0	0	0	5
Epsom and Ewell	0	0	0	3	2	0	0	0	5
Fareham	2	70	0	8	0	0	0	0	79
Gosport	8	2	0	4	55	0	3	3	75
Gravesham	0	27	9	45	32	41	0	0	155
Guildford	0	24	0	57	14	0	0	36	131
Hart	0	7	0	23	0	0	0	0	30
Hastings	0	0	0	10	5	0	0	0	15
Havant	1	7	2	13	17	0	0	1	40
Horsham	4	26	0	13	56	0	0	0	98
Isle of Wight	0	9	0	11	3	0	0	0	23
Lewes	0	2	0	22	18	1	0	1	44
Maidstone	33	24	0	25	4	0	0	2	89
Medway Towns	2	552	12	10	115	12	0	10	713
Mid Sussex	1	4	0	24	6	0	0	0	34
Milton Keynes	4	12	0	55	13	26	0	0	110
Mole Valley	0	0	0	2	0	0	0	0	2

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
New Forest	0	27	0	7	6	0	0	0	40
Oxford	0	15	0	10	48	7	0	75	155
Portsmouth	7	46	1	14	48	1	2	11	130
Reading	0	0	1	61	113	3	0	9	185
Reigate and Banstead	9	5	0	8	1	2	0	2	27
Rother	0	10	0	6	0	0	1	0	17
Runnymede	0	0	0	18	0	0	0	0	18
Rushmoor	2	52	0	4	10	0	0	0	68
Sevenoaks	0	14	0	11	1	0	0	0	26
Shepway	5	16	0	45	80	0	0	17	163
Slough	11	3	0	22	32	0	0	8	76
South Buckinghamshire	0	0	0	34	0	0	0	0	34
South Oxfordshire	0	0	0	6	14	0	0	0	20
Southampton	0	67	0	39	61	0	0	2	169
Spelthorne	0	1	0	18	2	1	0	0	22
Surrey Heath	0	0	0	4	0	0	0	0	4
Swale	33	18	10	32	9	1	0	78	180
Tandridge	1	0	0	12	1	0	0	0	13
Test Valley	10	6	0	0	5	0	0	0	21
Thanet	0	9	0	13	4	0	0	90	116
Tonbridge and Malling	0	49	0	65	111	0	0	110	336
Tunbridge Wells	0	11	4	14	0	0	0	18	48
Vale of White Horse	13	70	0	18	0	0	0	1	102
Waverley	94	8	0	6	19	2	0	0	129
Wealden	9	19	0	17	1	0	0	1	47
West Berkshire	10	64	17	35	13	0	0	40	179
West Oxfordshire	4	0	0	1	0	0	0	0	5

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Winchester	9	4	0	8	9	0	0	0	31
Windsor and Maidenhead	0	0	0	20	3	0	0	0	24
Woking	5	14	0	24	1	2	0	0	46
Wokingham	0	8	0	15	3	0	0	0	26
Worthing	1	5	0	14	8	0	0	0	28
Wycombe	11	22	0	12	0	0	0	2	47
<b>London</b>	<b>215</b>	<b>298</b>	<b>47</b>	<b>442</b>	<b>1,880</b>	<b>85</b>	<b>11</b>	<b>350</b>	<b>3,330</b>
Barking and Dagenham	44	0	0	17	152	0	0	1	213
Barnet	2	3	0	53	159	2	0	0	220
Bexley	1	0	8	4	26	6	0	0	44
Brent	7	17	2	4	77	22	1	17	147
Bromley	30	2	0	24	31	1	0	3	92
Camden	1	0	0	7	25	5	0	0	38
City of London	0	2	0	0	0	2	0	0	5
Croydon	1	20	5	29	27	18	2	4	105
Ealing	11	36	0	18	69	3	1	1	139
Enfield	9	6	0	11	19	0	0	23	69
Greenwich	1	9	1	4	101	0	0	8	123
Hackney	2	3	0	3	2	0	0	0	9
Hammersmith and Fulham	0	0	0	13	51	0	0	0	64
Haringey	0	7	0	5	99	0	0	2	113
Harrow	0	2	0	2	79	1	0	11	94
Havering	12	5	7	30	95	0	0	98	248
Hillingdon	11	11	0	0	23	0	0	1	46
Hounslow	16	22	1	1	18	0	0	4	62
Islington	0	1	9	1	6	6	0	1	24
Kensington and Chelsea	0	0	0	1	16	0	0	0	18

## Appendix 1

### Appendix T continued

Local authority	None	Employment	Retail	Housing	Mixed with housing	Mixed without housing	Open Space	Other	Total
Kingston upon Thames	0	15	1	6	16	0	5	9	52
Lambeth	1	5	0	8	53	2	0	3	73
Lewisham	0	0	0	4	93	0	0	0	97
Merton	0	0	1	10	16	0	0	0	28
Newham	57	58	0	117	192	11	0	60	496
Redbridge	5	0	0	14	40	3	0	18	80
Richmond upon Thames	0	0	0	11	26	0	0	18	54
Southwark	0	13	0	18	50	0	0	21	102
Sutton	1	7	0	4	2	0	0	22	37
Tower Hamlets	3	50	10	13	127	4	0	3	209
Waltham Forest	0	3	0	3	14	1	0	2	23
Wandsworth	0	1	0	6	109	0	0	7	123
Westminster	0	0	1	1	68	0	0	13	83
<b>England</b>	<b>8,581</b>	<b>11,300</b>	<b>439</b>	<b>7,571</b>	<b>10,951</b>	<b>1,408</b>	<b>1,274</b>	<b>3,584</b>	<b>45,122</b>

## Appendix U. Housing capacity on PDL by land type from the National Land Use Database in 2010, 2011 and 2012.

Region	A: Previously developed land now vacant	B: Vacant buildings	C: Derelict land and buildings	D: Previously developed land or buildings currently in use and allocated in local plan or with planning permission	Total A-D	
2010	North West	58,401	23,029	40,532	45,495	167,457
	North East	23,090	4,826	7,343	18,525	53,784
	Yorkshire and The Humber	34,048	8,682	14,206	18,719	75,655
	West Midlands	24,958	6,830	12,212	21,769	65,769
	East Midlands	19,954	6,827	6,138	22,420	55,339
	East of England	17,366	7,180	19,785	59,733	104,063
	South West	13,263	5,933	14,915	27,430	61,541
	South East	21,876	15,339	15,431	76,718	129,364
	London	88,957	24,272	36,343	143,184	292,756
England	301,913	102,918	166,905	433,993	1,005,728	
2011	North West	58,128	19,017	37,038	43,838	158,021
	North East	22,869	4,615	7,897	18,719	54,100
	Yorkshire and The Humber	33,662	8,661	14,050	18,802	75,175
	West Midlands	22,299	6,939	13,352	24,505	67,095
	East Midlands	18,350	6,498	6,206	22,942	53,996
	East of England	12,764	7,068	17,570	60,737	98,138
	South West	9,380	5,995	15,408	30,291	61,074
	South East	20,697	14,648	14,559	65,169	115,073
	London	88,649	22,973	35,866	143,625	291,114
England	286,798	96,414	161,946	428,628	973,786	
2012	North West	57,528	18,509	37,192	43,725	156,954
	North East	23,488	4,405	7,535	19,121	54,549
	Yorkshire and The Humber	34,775	8,856	14,033	20,835	78,499
	West Midlands	22,427	7,135	13,843	20,145	63,550
	East Midlands	17,930	6,400	6,133	22,916	53,379
	East of England	23,159	6,141	16,294	51,970	97,563
	South West	8,923	6,198	14,785	34,708	64,614
	South East	20,151	13,840	14,399	62,703	111,093
	London	92,005	21,834	32,688	149,262	295,790
England	300,386	93,318	156,902	425,385	975,991	

## Appendix V. Housing capacity on PDL by planning status from the National Land Use Database in 2010, 2011 and 2012.

Region	None	Allocated or with draft allocation in Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total	
2010	North West	37,859	38,899	32,369	46,112	12,218	167,457
	North East	10,874	16,975	12,611	12,770	554	53,784
	Yorkshire and The Humber	17,647	19,863	15,983	19,624	2,539	75,655
	West Midlands	11,300	17,496	15,312	20,522	1,139	65,769
	East Midlands	11,902	18,803	10,242	13,162	1,230	55,339
	East of England	4,924	51,085	21,321	21,503	5,230	104,063
	South West	7,690	29,103	6,955	15,097	2,696	61,541
	South East	6,733	64,209	25,125	26,528	6,769	129,364
	London	56,237	132,006	39,401	61,474	3,637	292,756
	England	165,166	388,439	179,319	236,792	36,012	1,005,728
2011	North West	39,278	37,785	28,430	41,851	10,677	158,021
	North East	9,820	18,674	12,799	12,124	683	54,100
	Yorkshire and The Humber	17,318	19,993	15,884	19,442	1,982	75,175
	West Midlands	11,425	21,021	14,414	19,241	994	67,095
	East Midlands	10,107	17,827	10,161	13,811	2,090	53,996
	East of England	5,220	49,473	21,283	20,017	2,146	98,138
	South West	7,342	29,769	6,867	14,319	2,777	61,074
	South East	8,804	52,327	22,353	22,800	7,004	115,073
	London	56,180	130,566	39,486	61,244	3,637	291,114
	England	165,494	377,435	171,677	224,849	31,990	973,786
2012	North West	39,695	37,685	27,772	41,249	10,533	156,954
	North East	9,457	19,441	13,044	11,924	683	54,549
	Yorkshire and The Humber	14,526	22,716	15,237	23,482	1,982	78,499
	West Midlands	11,813	17,528	13,983	19,473	753	63,550
	East Midlands	11,066	17,755	9,990	13,495	1,073	53,379
	East of England	4,547	46,523	20,809	23,926	1,759	97,563
	South West	6,663	33,416	6,595	14,267	3,673	64,614
	South East	10,360	49,891	22,794	21,817	6,231	111,093
	London	54,914	122,946	40,331	65,986	4,713	295,790
	England	163,041	367,901	170,555	235,619	31,400	975,991

## Appendix W. Housing capacity on hardcore sites in 2012 from the NLUD in 2012.

Region	None	With draft allocation or allocated in the Local Plan	Outline Planning Permission	Detailed Planning Permission	Planning Permission subject to further legal agreement	Total
North West	8,517	12,915	4,321	4,922	1,064	31,739
North East	2,425	4,721	2,213	654	4	10,017
Yorkshire and The Humber	8,344	12,920	3,753	7,171	1,533	33,720
West Midlands	5,062	5,917	3,110	1,314	637	16,040
East Midlands	2,387	6,560	939	1,322	74	11,282
East of England	469	10,760	12,087	3,257	260	26,833
South West	2,013	16,199	3,317	1,354	416	23,299
South East	542	19,574	12,702	4,067	1,197	38,082
London		909		46		955
England	29,759	90,475	42,442	24,108	5,185	191,968



## APPENDIX 2

### Previously Developed / Brownfield Land Briefing Note

27 February 2015

1. The National Planning Policy Framework (NPPF) seeks to 'encourage the effective use of land by reuse land that has been previously developed (brownfield land), provided that it is not of high environmental value' (paragraph 17).
2. Under the NPPF, previously developed land is 'land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure'. It however does not include: agricultural or forestry buildings; land developed for minerals/ extraction/ waste disposal, private residential gardens; parks; recreation grounds; allotments; or previously developed land where permanent or fixed structures have blended into the landscape in the process of time.
3. The Council's Development Opportunity Sites List includes a total of 183 sites. The list is inclusive of sites that were listed in the Redbridge Local Plan Preferred Options Report, with additional sites identified via the 2013 Strategic Housing Land Availability Assessment (SHLAA) undertaken on a pan-London basis by the Greater London Authority (GLA), as well as through the Local Plan process itself. The list also includes a number of sites proposed for non-residential uses (either new uses or improvements to existing non-residential uses).
4. The table below provides a breakdown of the 183 sites currently on the Development Opportunity Sites List, having regard to the number and percentage of proposed sites that are previously developed and not previously developed, as well as residential and non-residential sites. For residential sites, an estimated number of dwellings are identified:

Category	Number of Sites (number)	Percentage of Sites (%)	Estimated number of dwellings (number)
Previously Developed Land (All) <sup>1</sup>	163	89	9,848
Sites that are not on Previously Developed Land (All)	20	11	1,672
<b>Total Sites (All uses)</b>	<b>183</b>	<b>100</b>	<b>11,520</b>
Previously Developed Land (Other uses other than housing)	17	11	0
Previously Developed Land (Housing sites including mixed uses)	145	89	9,848
<b>Total sites that are Previously Developed Land</b>	<b>163</b>	<b>100</b>	<b>9,848</b>
The uses other than housing	7	35	0
Housing sites including mixed uses	13	65	1,672
<b>Total Sites Not Previously Developed</b>	<b>20</b>	<b>100</b>	<b>1,672</b>

<sup>1</sup> Car parks have been taken as Previously Developed Land.

Source: London Borough of Redbridge Development Opportunity Sites, Preferred Options Report, January 2013. Amended version, August 2014

5. From the table above, it is evident that:
  - a. Within the total 183 sites (including residential and non-residential), 163 sites or 89% are previously developed land.
  - b. Within the 163 sites that are previously developed land, 145 of these (89%) are for housing / mixed use, with the remaining 17 (11%) for non-residential development.
  - c. Within the 20 sites that are not previously developed land, 13 sites (65%) are for housing / mixed use and 7 sites (35%) are for non-residential.
  - d. The 183 sites are estimated to yield 11,520 dwellings, with 9,848 dwellings (85% of total dwellings) on previously developed land and 1,672 dwellings (15%) on non-previously developed land.
6. The table below provides a summary of the housing sites:

Housing Sites	Number of sites (number)	Percentage (%)	Number of units	Percentage of total units (%)
Total Housing sites	158	86 (of total sites)	11,520	100
Previously Developed Land	145	92 (of housing sites)	9,848	85
Not Previously Developed Land	13	8 (of housing sites)	1,672	15

Source: London Borough of Redbridge Development Opportunity Sites, Preferred Options Report, January 2013. Amended version, August 2014.

7. There are certain sites that are not taken into account in the above statistics that are counted in the Council's London Plan housing target as identified by the SHLAA process. These are sites that have been classified as low probability sites and have a constrained capacity sites with reduced likelihood of coming forward. Collectively these total 1,115 dwellings. Similarly sites that are classified as small sites (or windfall sites) are also not taken into account in the above data, however, would amount to 270 units per year over the 15 year period (totalling 4,050 dwellings); it is envisaged that very few windfall sites would be not previously developed land.
8. Redbridge has one of the most extensive Local Development Frameworks / Local Plans in the country. This includes two site allocations documents and three area action plans (which also allocate sites). In preparing these sites and the draft Redbridge Local Plan 2015-2030, considerable work has been undertaken in identifying housing sites, with the focus being on previously developed land. As a result of this work, Redbridge has almost twice as many formally allocated housing sites than the next highest in London. Whilst additional previously developed sites would always considered for allocation in the emerging Local Plan, it is unlikely that many more that haven't already been identified will come forward.
9. It is relevant to note that the proposed London Plan target for Redbridge (1,123 dwellings per year) is still well short of the overall housing need in the borough, which is estimated to be in excess of 2,000 dwellings per year. Across London, housing supply is 42,000 per year (identified through the GLA SHLAA 2013), whereas housing need is 49,000 per year. This means that there is a shortfall of housing within London, so there is limited scope for Redbridge to meet any shortfall within London. It also demonstrates that the Council's shortfall (circa 45% of total need) is far greater than the pan-London shortfall (circa 15%). Furthermore, boroughs immediately outside of London are heavily constrained by green belt (for example, Epping Forrest District is 94% Green Belt). Consequently, meeting Redbridge's housing need in boroughs outside of London is not a straightforward answer.



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# Subject: Design Approaches to New Housing Development

**Report to: Planning Committee**

**Report of: Executive Director of Secretariat**

**Date: 18 March 2015**

**This report will be considered in public**

## 1. Summary

- 1.1 This report sets out the background for a discussion with invited experts on the issue of the role of different housing typologies in increasing housing density. The discussion will focus on how to help accommodate a range of individuals and families, without sacrificing residential quality or sustainability.

## 2. Recommendation

- 2.1 **That the Committee note this report as background to the discussion with invited experts on different design approaches to new housing development in London.**
- 2.2 **That the Committee delegate authority to the Chair, in consultation with the Deputy Chair, to agree a future site visit to new developments in London that demonstrate different approaches to delivering high quality and sustainable housing for a range of individuals and families.**
- 2.3 **That the Committee use the discussion on this item to contribute to a response to the revised Housing Supplementary Planning Guidance that is expected to be published for consultation in May 2015.**

## 3. Background

- 3.1 The London Plan has been revised in response to the capital's unprecedented levels of growth. Housing targets have been increased by 31 per cent – to 42,000 per annum. Affordable housing targets have been raised to 17,000 and policy gives priority to family homes.
- 3.2 The Mayor recognises the need to build homes at higher densities and a number of policies in the Plan have been amended to encourage development of homes at higher densities. However he also recognises that “the last decade has been characterised by high-rise, high-density housing providing predominantly one- and two- bedroom flats often marketed towards young professionals.”

- 3.3 In March 2014 the Planning Committee reviewed how the density of housing development is being managed in response to the rapid growth of London’s population and the need for new homes in the capital.
- 3.4 Part of that discussion touched on the fact that different forms of development can have similar densities and London has historically developed at a wide range of densities, with many of its most successful residential neighbourhoods being built at relatively high density more than a century ago. High density does not have to mean high rise flats.

## **4. Issues for Consideration**

- 4.1 Members have previously discussed the challenges of providing family homes at higher densities that include the necessary level of interior, exterior and amenity space. Alternative solutions have been put forward (and are being built) that attempt to provide family homes without exclusive use of a garden.

### **Planning policy and guidance**

- 4.2 There is a range of planning policy and guidance in place that influences the type of housing that is being built to meet London’s housing need.
- 4.3 The London Plan has been amended in a number of ways that will impact on the delivery of housing. Specifically, policy has been amended to encourage higher densities:
- Policy 2.15 encourages local authorities to proactively manage the changing roles of town centres... promoting diversification, particularly through high density, residential led, mixed use re-development.
  - Policy 2.13 expects Opportunity Areas to meet and where appropriate, exceed, the minimum guidelines for housing capacity
  - Policy 3.7 applies to large residential sites capable of accommodating more than 500 dwellings that should be progressed to encourage higher densities.
- 4.4 The London Housing Design Guide (2010)<sup>1</sup> is specific that:
- “To make dwellings built for smaller households suitable for a wider range of people, including families with children, we need to explore different models of housing. These will include maisonettes, a type that can deliver successful family housing at moderate densities. Where family flats are included in higher density development, developers must ensure that these provide at least some of the amenity afforded by houses, including private outdoor space.”
- 4.5 The Guide was published in Interim form in August 2010 and was superseded by the publication of the Housing Supplementary Planning Guidance (SPG) in November 2012. The Housing SPG sets out guidance on how to achieve housing densities in excess of those contained in the London Plan’s housing density matrix. The current Housing SPG is proposed for amendment and public consultation in May 2015.

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<sup>1</sup> <https://www.london.gov.uk/sites/default/files/Interim%20London%20Housing%20Design%20Guide.pdf>

## **The costs of long term management and maintenance of higher density housing**

- 4.6 For housing built to higher densities, a range of additional services and amenities are required to maintain residential quality. For example, London Plan policy and Housing Supplementary Planning Guidance specify a range of communally provided and used services and standards. These include:
- The number of lifts required to access different heights and secure access or concierge systems
  - Play space standards based on estimated child occupancy
  - Open space standards that cover provision such as outdoor sport and play facilities, local parks and other public spaces
- 4.7 Where there is shared or communal provision the cost of maintenance and management of these will be subject to service charges. As well as day-to-day service, freeholders charge for cyclical maintenance works such as redecoration of the exterior and communal parts as well as 'one-off' major works covering repairs of the exterior and the communal areas, the replacement of roofs, new windows and doors, replacement of lifts, and new door entry systems.
- 4.8 A previous Assembly investigation<sup>2</sup> identified the average service charge bill to be around £1,800 – £2,000 per annum in London, although they can reach up to £5,000. Where major works are involved, particularly for tall buildings, service charges may reach tens of thousands of pounds for each unit. Leaseholders of private accommodation are required to pay these up-front while social tenants contribute through weekly rents.
- 4.9 If policy is pointing toward higher density, mixed tenure housing development, then the implications of long-term management and maintenance costs must be a consideration in terms of the affordability of this type of housing.

### **Issues for discussion**

- 4.10 Mayoral and Assembly priorities are to increase the delivery of both affordable and family housing. It is suggested that the focus of this meeting should be on how to increase density to help accommodate London's population through different typologies which are also suitable for a range of individuals and families, without sacrificing residential quality or sustainability.
- 4.11 In light of the forthcoming Housing SPG consultation Members may wish to focus the meeting's discussion on the following questions:
- For different development sites, what typologies of housing are suitable to meet the needs of a range of individuals and families?
  - Can this type of housing be delivered at higher densities than previously thought while retaining residential quality?
  - What can London learn from successful international examples?
  - How can management and maintenance costs be reduced so as to retain affordability?
  - What is working well in London, and what not so well?
- 4.12 It is further suggested that the discussion might focus on the suitability of different housing design approaches for the likely locations of new housing development in London, for example:

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<sup>2</sup> Highly charged: Residential leasehold service charges in London, March 2012  
<http://www.london.gov.uk/sites/default/files/Highly%20charged%20report%20March%202012.pdf>

- Opportunity Areas
- Estate renewal
- Small, infill and difficult sites
- Suburban intensification

#### **Invited guests**

4.13 The following guests have confirmed their attendance at this meeting:

- David Birkbeck, Chief Executive, Design for Homes
- Martin Green, Head of Specialist Housing Services, London Borough of Southwark
- Esther Kurland, Director, Urban Design London
- Philipp Rode, Executive Director and Senior Research Fellow, LSE Cities

#### **Potential site visit**

4.14 Members are recommended to agree to attend a future visit of a number of new developments in London that demonstrate different approaches to delivering high quality and sustainable housing for a range of individuals and families.

## **5. Legal Implications**

5.1 The Committee has the power to do what is recommended in this report.

## **6. Financial Implications**

6.1 There are no direct financial implications to the GLA arising from this report.

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#### **List of appendices to this report:**

None

<b>Local Government (Access to Information) Act 1985</b>	
List of Background Papers:	
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# Subject: Letter to the Mayor – Tall Buildings and London’s skyline

**Report to: Planning Committee**

**Report of: Executive Director of Secretariat**

**Date: 18 March 2015**

**This report will be considered in public**

## 1. Summary

- 1.1 This report asks the Committee to formally note a letter from the Chair of the Planning Committee to the Mayor on the subject of tall buildings and London’s skyline.

## 2. Recommendation

- 2.1 **That the Committee notes the letter to the Mayor from the Chair of the Planning Committee, as attached at Appendix 1.**

## 3. Background

- 3.1 The number of planning applications for tall buildings in London is accelerating. A recent survey by New London Architecture suggests that 236 buildings of more than 20 storeys could be on the way in London, 80 per cent of which are intended to be residential. Almost a fifth are already under construction and around another half have planning approval.
- 3.2 The Planning Committee met on 10 June 2014 with a number of experts to discuss why London is seeing an unprecedented increase in the number of tall buildings, what purpose these new developments serve and what advantages and disadvantages they present for London and Londoners.
- 3.3 On 5 November 2014 the Assembly unanimously passed a motion that set out its concerns on the issue. The motion called on the Mayor to:
1. Establish a ‘skyline commission’ to advise on the design impact of tall buildings.
  2. Adopt more detailed and rigorous master planning in relation to tall buildings, especially within Opportunity Areas.
  3. Draw up a London Plan policy that formalises the ‘clusters’ policy for tall buildings.
  4. Undertake a review of existing protected views, with the intention of adding new viewing corridors.
  5. Support the development of a fully interactive 3D computer model of London’s emerging skyline.

6. Adopt a requirement for all developers with proposals for tall buildings to consider other building configurations.

#### **4. Issues for Consideration**

- 4.1 On 9 March, the Chair of the Committee - in consultation with the Deputy Chair - sent a letter to the Mayor to follow up some of the issues in relation to London's skyline (see **Appendix 1**).

#### **5. Legal Implications**

- 5.1 The Committee has the power to do what is recommended in this report.

#### **6. Financial Implications**

- 6.1 There are no direct financial implications to the GLA arising from this report.

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#### **List of appendices to this report:**

Appendix 1 – Letter to the Mayor: Tall buildings and London's skyline

<b>Local Government (Access to Information) Act 1985</b>
List of Background Papers: None
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# Appendix 1 – Letter to the Mayor: Tall buildings and London’s skyline

## London Assembly Planning Committee

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Web: [www.london.gov.uk](http://www.london.gov.uk)  
**Date:** 9 March 2015

Boris Johnson  
Mayor of London  
City Hall  
The Queen’s Walk  
London  
SE1 2AA

Dear Mayor Johnson,

### **Tall buildings and London’s skyline**

I am writing to you as Chair of the Planning Committee to follow up some of the issues that have been developing over the last few months in relation to London’s skyline and the impact of the growing number of tall buildings we have seen springing up.

Research last year by New London Architecture identified 236 buildings of 20 storeys or more in the development process<sup>1</sup>. CBRE has identified 31 that will be under construction this year<sup>2</sup>. The cumulative impact of these developments on London’s heritage, character, and architectural distinctiveness is not being thoroughly considered. 80 per cent of these buildings contain residential, and the majority are solely residential.

When you announced your revised housing strategy, in 2013, you went on record as saying that “we’ve got to build 42,000 new houses every year, but it won’t mean towers are ‘popping up all over London’”. However, an increasing number of proposals for tall buildings are being submitted to you for approval. It is estimated that around 600 strategic applications for tall buildings have been referred to you since 2008.

Tall buildings can make a positive contribution to city life and the skyline, but only if they’re in the right places, meet the right needs, and interact well with the character and identity of the immediate and surrounding area.

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<sup>1</sup> New London Architecture. “London’s Growing Up!” April 2014:  
[http://www.newlondonarchitecture.org/dls/TB\\_B1.pdf](http://www.newlondonarchitecture.org/dls/TB_B1.pdf).

<sup>2</sup> “Boom in housebuilding as London reaches for the sky.” The Times. 30 December 2014:  
<http://www.thetimes.co.uk/tto/business/industries/construction-property/article4309335.ece>.

At the Committee's meeting on 10 June last year the Deputy Mayor for Planning and invited experts discussed the issue of tall buildings and London's skyline. The Committee looked at why the number of proposed tall buildings is on the rise, whether residential developments will really meet London's housing need and if planning policies are up to the task and being adequately applied in the face of so many tall building applications.

Members of the Committee were firstly interested to understand the reasons for this sudden explosion in tall residential buildings. Our initial assumption was that the increase in these buildings may be a response to the pressures on local authorities, and for you, to deliver more housing at a time of very high land prices.

However the Architects Journal /Observer campaign, maintains that: "most of the proposed towers are not vital to London's prosperity and financial wellbeing. The majority are residential, but they are neither essential to meeting housing needs, nor the best way to achieve greater densities".

Peter Rees, planning Professor at UCL, and former City Corporation Chief Planning Officer, who attended our June meeting, told us that these towers are not a necessary response to London's housing need, higher densities can be achieved by alternative means and they are more likely to "appeal to the actual people who need homes in the homes market in London, rather than the international investment market." From his own experience, he told us these residential towers represent a "huge degree of underuse and emptiness."

We then discussed how far these towers are contributing to meeting London's affordable housing need. We were reminded of the Royal Town Planning Institute's evidence to the House of Commons as far back as 2002 that suggested that "achieving high residential densities in tall building in the 1960s was not a solution for social housing or for housing families. More recently, there have been indications that it may work better for young professionals, or single people. Where incomes are higher, management and maintenance costs can be more readily taken on board, and sense of ownership fostered."

The suggestion that this kind of building is necessarily far from affordable, and in any case does little to contribute to London's overall housing need, was highlighted to us by Rowan Moore, the architecture critic of The Observer. He quoted the example of Ludgate House, a new 47 storey tower, the top 27 storeys of which actually delivers 65 only flats. This undermines the argument that tall buildings are necessary to achieve the levels of high density required to meet London's housing need. He also told us "If you are talking about housing that Londoners need, a studio flat in 1 Blackfriars starts at £1,080,000." He concluded that these towers "are not really serious contributions to London's housing need."

Even where properties are conceivably affordable to buy, the running and maintenance costs result in very high service charges.

The Committee also explored the impact on heritage. London is a constantly evolving city and already 11 tall buildings are listed; however, tall buildings have a significant negative effect on London's other heritage assets. Nigel Barker, Planning and Conservation Director at English Heritage, told the Committee that the existing historic environment "is not being

recognised and is not being clearly weighed in the balance in the way that the national planning framework requires to be done.”<sup>3</sup> London’s heritage, including its iconic historic buildings, famous vistas, and distinctive neighbourhoods, is a unique selling point which brings numerous benefits for tourism and inward investment, yet is being undermined by the redrawing of its skyline.

Experts suggested that tall buildings do not achieve levels of environmental sustainability that should be expected. Jane Wernick, director of Jane Wernick Associates, told the Committee “from the point of view of embodied energy and carbon footprint, the taller the building the higher the amount of embodied energy required per useable square metre.”<sup>4</sup> This is largely due to the materials because low-carbon alternatives such as timber are often not viable in tall buildings. The Committee also heard that “tall buildings suffer more highly from heat losses for the same amount of insulation as lower buildings because of the higher wind speeds” and are not conducive to renewable energy.”<sup>5</sup>

In conclusion, the Committee heard that London runs the risk that the cumulative impact of these developments is going to have an irreversible negative impact on the city. We need new policies, and to better implement existing policies.

Sunand Prasad, a founding Commissioner of the Government’s Commission for Architecture and the Built Environment and RIBA President from 2007 to 2009, suggested to the Committee that where tall residential schemes are proposed to achieve new homes at higher densities on appropriate sites, then it should be a requirement of the London Plan that alternative methods of achieving the same goals and densities should be demonstrated, shown and considered, as a prior condition before a final scheme is put forward for approval. This forms the basis for what we consider to be the most crucial recommendation (see below, Recommendation 6).

It is well known that tall buildings are not the only approach to achieving higher densities. For example, the Kings Cross development achieves high levels of densities through good urban design and only one building exceeding 16 storeys. I would refer to you the discussion that took place at the Planning Committee on 11 March 2014.

Create Streets have argued that it is not necessary to build tower blocks to achieve high housing density, and that well-designed street-based developments can achieve higher densities than towers would produce. Their proposed alternative scheme for the Mount Pleasant site “increases the Royal Mail’s proposed housing density by around 7 per cent (from 681 units to an estimated 730) and does so in a way that would generate better links to surrounding streets, homes & shops and more value.” It also features pedestrian routes that are “75 per cent more accessible” and “puts green spaces at the heart of the community”.

As you are aware, the Assembly has supported the call made last year by the AJ and Observer’s Skyline campaign to improve the quality of the capital’s tall buildings. On 5 November 2014 the Assembly unanimously passed a motion that set out our concerns on the issue. The motion called on you to:

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<sup>3</sup> [Transcript](#), p. 35.

<sup>4</sup> [Transcript](#), p. 42.

<sup>5</sup> [Transcript](#), p. 42-43.

**1. Establish a 'skyline commission' to advise on the design impact of tall buildings.**

A Skyline Commission could look at the totality of tall building development in London and assess the impact that it is having on the shape of the city. An independent commission made up of experts from a range of disciplines could provide advice throughout the process, from the selection of architects through to detailed construction.

**2. Adopt more detailed and rigorous master planning in relation to tall buildings, especially within Opportunity Areas.**

The London Plan emphasises that: "The Mayor expects [opportunity areas] to make particularly significant contributions towards meeting London's housing needs." Future proposals are therefore likely to also be located in areas which have so far largely been devoid of tall buildings, like many of the 38 opportunity areas designated in the London Plan. Many of the planned new towers are in the regeneration zones and opportunity areas of east and south London - Tower Hamlets, Lambeth, Greenwich, Newham and Southwark will between them have 140 of the 236 towers identified by New London Architecture. The Mayor must therefore adopt a more rigorous master planning process, including much more extensive public consultation, in London's Opportunity Areas to ensure future development results in a network of sustainable settlements that do not pose a threat to London's heritage, character and architectural distinctiveness.

**3. Draw up a London Plan policy that formalises the 'clusters' policy for tall buildings.**

At the Committee's meeting in June there was much debate about how the principle of 'clusters' of tall buildings are managed in London. However, without specific and formal guidance about what this means in the London Plan it appears that 'clusters' of buildings are being allowed to develop in an unplanned way - Vauxhall being a prime example of how applications are allowed even where they do not comply with the original planning frameworks. Clusters, as well as individual tall buildings, should also be considered from a range of levels and from different viewpoints both locally and across London.

**4. Undertake a review of existing protected views, with the intention of adding new viewing corridors.**

The London View Management Framework explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views. I would refer you to the London skyline debate in April 2014 when short comings of the Framework were discussed. It appears to some to only protect strategic views of St Paul's and the Palace of Westminster, and only applies to certain zones. We would encourage the Mayor to review this guidance in the light of the towers being proposed.

**5. Support the development of a fully interactive 3D computer model of London's emerging skyline.**

This model would show the precise location of each of the planned towers to enable professionals, politicians and the public to see what is proposed in their local areas and, crucially, to get a sense of the cumulative effect of these towers on the city. I am encouraged by the support you appear to have given this suggestion in the Deputy Mayor's comments on the skyline campaigns recommendations that were reported in October.

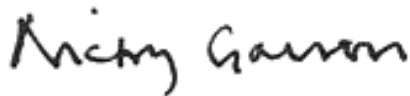
**6. Adopt a requirement for all developers with proposals for tall buildings to consider other building configurations.**

Alternatives to building upwards need to be presented before a final design approach is given permission. This is happening at Mount Pleasant now, where Create Streets and the local community have come up with an alternative vision that, while not containing high rise elements, manages to increase the Royal Mail's proposed housing density by around seven per cent and does so in a way that would fit in more appropriately with London's traditional form.

With the continuing pressure for tall buildings, London cannot afford to wait for the new London Plan in 2018/2019. We need new and improved policies now, and for those policies which exist to be interpreted in light of this evidence.

I look forward to receiving your views on the points contained in this letter.

Yours sincerely,



Nicky Gavron AM  
**Chair of the London Assembly Planning Committee**

Cc: Sir Edward Lister, Deputy Mayor for Planning

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# **Subject: Responses to Planning Committee report *Localism in London: What's the Story?***

**Report to: Planning Committee**

**Report of: Executive Director of Secretariat**

**Date: 18 March 2015**

**This report will be considered in public**

## **1. Summary**

- 1.1. This report summarises the responses to the Committee's final report on the Localism Act 2011 in London: "*Localism in London: What's the Story?*"

## **2. Recommendations**

- 2.1. **That the Committee notes the responses to the final report on the review of progress in London since the introduction of the Localism Act in 2011.**
- 2.2. **That the Committee builds in further follow up and monitoring of the issues raised in Appendix 1 to this report in the development of its future work programme.**

## **3. Background**

- 3.1. The Committee's report '*Localism in London: What's the Story?*' reviewed the implementation in London of a number of measures contained in the Localism Act in 2011. The report was formally agreed by this Committee on 22 January 2015. The full report can be found on the Committee's web page here: <http://www.london.gov.uk/mayor-assembly/london-assembly/publications/localism-in-london-whats-the-story>
- 3.2. Key findings of the report were:
- That the legislation was designed primarily for smaller, more homogenous areas than can be found in London;
  - That London's complex network of mixed communities with diverse interests seems to make even defining neighbourhood areas a difficult and time consuming process; and
  - That the use of new rights for individuals and communities to take over community assets in the Localism Act appears to be more widespread across London.

- 3.3. The report sought views in response to the following questions:
- Are the requirements for designating neighbourhoods, in terms of boundaries, membership and competing interests, simply unworkable in London?
  - How can we overcome the barriers to getting a forum recognised?
  - Do affluent communities with access to professional expertise to drive the formation of neighbourhood forums have an advantage over those with less capacity or history of community organisation?
  - To what extent are financial considerations and the budget pressures on local authorities slowing down the progress of neighbourhood planning in London?
  - Would greater promotion for neighbourhood planning in London's opportunity areas both further the aims of localism and regeneration and boost a sense of legitimacy and support in these areas?
  - Why are there so few listed assets in some boroughs?
  - Are boroughs interpreting the legislation consistently?
  - Given London's city wide communities, is the legislation supportive of recognising assets on the basis of communities of interest rather than communities of locality?

## 4. Issues for Consideration

### Feedback

- 4.1. Written responses to the report and updates on the progress of measures contained in the Localism Act have been received from six individuals and organisations:
- AECOM;
  - Department of Communities and Local Government;
  - Ham and Petersham Neighbourhood Forum (Andrew Rogers);
  - Seona Lightfoot;
  - The Africa Centre; and
  - The Pinner Association (Dr Ruth Boff).
- 4.2. **Appendix 1** contains a summary of those responses as well as respondent's questions and recommendations for the Committee. The Appendix also includes an update on progress from the Department of Communities and Local Government

## 5. Legal Implications

- 5.1. The Committee has the power to do what is recommended in this report.

## 6. Financial Implications

- 6.1. There are no financial implications to the GLA arising from this report.

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**List of appendices to this report:** Appendix 1- Summary of Responses to Localism Report

**Local Government (Access to Information) Act 1985**

List of Background Papers:

Planning Committee report, *Localism in London: What's the Story?* (November 2014)

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## Appendix 1

### Summary of Responses to Localism Report, November 2014

#### Why is interest so limited?

- Are the requirements for designating neighbourhoods, in terms of boundaries, membership and competing interests, simply unworkable in London?
- **AECOM** suggest that the extensive powers granted to communities have failed to bring together different interest groups and have not resolved boundary tensions. It points to a lack of guidance on the recognition of sub-neighbourhoods and the poor understanding of the role, power and long term influence of spatial plans as applied to small areas.
- **AECOM** argues that the report does not recognise the potential spinoffs from this planning opportunity, including housing, asset, environmental, sustainable communities, public safety at street level, transport and mobility, economic and place-making initiatives. It suggests that more scoping, development and educational work at the inception stage is therefore needed to promote the benefits of a plan and see it through to completion.
- **AECOM** believes that there should be a more strategic approach for London, using the GLA to promote neighbourhood plans and identify 'functional neighbourhoods' among community networks and councils. It also stresses that cross borough co-operation needs to be facilitated, with forums straddling boroughs having found the designation and liaison burden particularly high.
- **Pinner Association** argues that there is a significant difference between estate agents' and people's definition of an area and government designation of an area. It suggests that Neighbourhood Development Plans (NDPs) have been undermined by 'inflammatory statements' from the Housing Minister in 2011, as well as having no powers to say that an area is saturated. Furthermore, it argues, an NDP is limited in the same way as the London Plan and borough plans as they are trumped by government 'permitted development' rights.
- **Ham and Petersham Neighbourhood Forum** argues that while NDPs may extend the statutory regime in London, the city is not a 'blank slate', posing a challenge to the introduction of Plans. It may be possible to overcome this with guidance from a higher level planning authority issuing policy and guidance for NDPs in London. There could also be scope for more London plan guidance and a 'London wide framework for neighbourhood planning'. It also argues that there needs to be a carefully tailored approach for each location, noting the importance of local green infrastructure and effective citizen engagement. It argues that legitimacy for NDPs can be given through political, managerial and professional, community, business and trade union leadership.
- How can we overcome the barriers to getting a forum recognised?
- **AECOM** believes that better leadership from councillors would help get a forum recognized although they tend to have reservations about neighbourhood planning posing a threat to representative democracy, particularly as traditional planning has been something done to communities, rather than led by them. AECOM suggests that this creates a culture that is weary, negative, reactive and threatening. AECOM also indicates that bringing together 21 individual is much more difficult in London as they may represent or come from a wide variety of differing interest groups.

- **AECOM** recommends Civic Engagement structures such as those in Lambeth and Lewisham, with these providing for the growth of Neighbourhood Forum Steering groups. It also suggests that a 'scoping' stage is needed to identify interest, boundaries and the name of neighbourhood groups. It points to the example of former NDCs in London which had powerful community boards and significant investment in terms of leadership and member training, officer support and financial resources.
- **Ham and Petersham Neighbourhood Forum** supports the government's suggestion that deadlines for neighbourhood area designation would encourage boroughs. It also argues that a change to a more welcoming attitude in boroughs towards planning decentralisation, combined with knowledge sharing and highlighting of Community Infrastructure Levy (CIL) objectives. It suggests a role for the GLA and the London Plan in facilitating this and raising awareness.

## Why is interest so concentrated?

- Do affluent communities with access to professional expertise to drive the formation of neighbourhood forums have an advantage over those with less capacity or history of community organisation?
- **AECOM** suggests time as the most important asset with groups putting up to 5,000 voluntary hours into their plan, with this being incompatible with the long working hours of Londoners. It also suggests that concentration is influenced by successful neighbourhood plan areas challenging and motivating the neighbourhood next door.
- **Seona Lightfoot's** assessment is similar, as she suggests that the people involved require intensive analysis and impartiality, while being mindful of options and consequences down the line, making it difficult for Londoners with limited time and a lower sense of community to set up NDPs when compared to those in rural areas. She also argues that in rural areas Plans are often damaged by personal agendas, manipulation and self-interest, suggesting that community organisation may not necessarily lead to success.
- However, **Pinner Association** suggests that affluence does have an influence, as affluent people have a vested interested interest in maintaining their privileged environment. In spite of this, it argues that in areas that already have a relatively active civic or amenity society or residents' association, people may believe that these organisations already monitor planning in their area and hence do not feel the need to spend time and money on setting up a neighbourhood forum.
- **Ham and Petersham Neighbourhood Forum** also agrees that levels of affluence drive formation, suggesting that only 10 per cent of neighbourhood plan applications were being made in 20 per cent most deprived English areas.
- **The Africa Centre** has raised concerns that Westminster Council is avoiding engaging with the Black Diasporan Community that they represent.

## Why is progress so slow?

- To what extent are financial considerations and the budget pressures on local authorities slowing down the progress of neighbourhood planning in London?
- Progress is slow, according to **AECOM**, because planning officers are generally very unclear about the DCLG resources they can tap for exercising their duty to support, and although some boroughs such as Westminster may have a full-time officer working on NDPs, the NDP lead will typically only be spending a third to a half of their time supporting groups.
- **Pinner Association** believes that the need for the London Borough of Harrow to make significant cuts will mean that neighbourhood planning funding will be lost.
- **Ham and Petersham Neighbourhood Forum** agrees that budget constraints prevent the preparation of borough wide frameworks and policies for neighbourhood planning. It also suggests there is

complacency in relying on 'planning obligations' such as Affordable Housing targets over the Community Infrastructure Levy.

## Is enough support being given?

- Would greater promotion for neighbourhood planning in London's opportunity areas both further the aims of localism and regeneration and boost a sense of legitimacy and support in these areas?
- **AECOM** considers there to be a strong need for further promotion, coupled with on the ground development work and dependable technical support vital. It suggests that in order to encourage embryonic groups into the support system, a more dedicated post for this kind of activity within the GLA should be created. It points to White City where getting community buy-in and integrating new areas into the neighbourhood can ensure social sustainability as well as spreading the White City Opportunity Area benefits.
- **Pinner Association** again argues that any development will be of limited value so long as government is able to impose 'permitted development' rights.

## Are boroughs interpreting the legislation consistently in London?

- Why are there so few listed assets in some boroughs?
- **Ham and Petersham Neighbourhood Forum** reports that the forum attempted to register the local Barclays bank as an Asset of Community Value (ACV). However, it reports that this was rejected by the London Borough of Richmond upon Thames on the grounds of commerciality. It was advised to make fresh application as it could not appeal short of a judicial review. It says that commerciality is not a valid reason for rejection under the Localism Act, citing the example of the listing of public houses. It is also the forum's view that the Council's reason for refusal is a material consideration in the assessment of any planning application, such as the application for a Sainsbury's Local on the site.
- **Ham and Petersham Neighbourhood Forum** suggests that there may be need for legal clarification, for example on exemption from ACV status in planning decisions.
- Are boroughs interpreting the legislation consistently?
- **AECOM** disagrees with the example of Hammersmith and Fulham designating the boundary first of a NDP and then consulting separately on the qualifying body, instead proposing the integration of the two stages, with development work to resolve tensions between groups.

## Can assets of London-wide importance be covered by the guidance?

- Given London's city wide communities, is the legislation supportive of recognising assets on the basis of communities of interest rather than communities of locality?
- **AECOM** agrees with the notion that assets could be based on communities of locality.
- **Ham and Petersham Neighbourhood Forum** points out that ACV is a designation and not a policy as such. It recommends that positive planning for assets of London wide importance may be required to be explored, to complement this approach for cumulative benefits to be realised.

## Questions raised by responders

### Ham and Petersham Neighbourhood Forum -

1. Knowledge sharing on the processes and priorities for Community Infrastructure Levy (CIL) and highlighting CIL objectives, via neighbourhood planning may be a challenge for boroughs. How could the GLA assist the boroughs on this point?
2. How could the London Plan raise awareness of the resource benefits for neighbourhoods under the new system?
3. How could the London Plan and GLA enable greater neighbourhood planning in non-affluent areas, with an apparent lack of professionals? Are these areas possibly the most dependent on public resources, in terms of planning for community infrastructures, health and wellbeing, that could benefit from neighbourhood planning?
4. Are indices of environmental wellbeing (a 'happiness index'), relevant to assessing the prevalence of neighbourhood planning, as an alternative and or together with the Index of Multiple Deprivation (IMD)?
5. Would the London Assembly be in position to determine: How many London boroughs, made applications to the Department of Communities and Local Government (DCLG) for 'forerunner' status?
6. Out of any applications made to the Department for Communities and Local Government (DCLG) for 'forerunner' status, what proportion of these were successful or not in gaining said status?
7. How many neighbourhood groups in boroughs have made application for government support, for example under the Building Communities Consortium, the government 'Supporting Communities in Neighbourhood Planning' or any other grants and support programmes?
8. Out of those neighbourhood groups in boroughs applying for support in question 3, what proportion of these were successful or not, in gaining support?
9. Could the GLA Supplementary Planning Guidance (SPG) 'Character and Context' of June 2014 provide a model for preparing evidence bases to ensure that 'communities of locality' can be supported in the city neighbourhoods using the ACV designation?

### AECOM-

1. Do NP groups have a role in delivering growth as well as planning for quality lifetime neighbourhoods?
  - **AECOM's** experience from around the country, however is that groups do come to terms with their housing allocations, some exceed it and the main reason for this is that they get to grips with the extent of local housing need which in urban areas has become a regular part of a neighbourhood plan process .
  - In other words NP may be a very useful and under-used mechanism for getting buy-in for significant housing growth and the change this implies.

## Recommendations from responders

### Ham and Petersham Neighbourhood Forum -

1. The issue of housing, despite CIL currently not supporting Affordable Housing, may remain acute in NDPs and as such guidance on economic viability assessment from the GLA for boroughs may be welcome.

### AECOM-

1. **AECOM** suggests that the GLA, being more detached from local politics, could play a useful catalytic role in identifying functional neighbourhoods in London. It estimates there are between 600 to 700



neighbourhoods in London with most boroughs having 15-20 functional neighbourhoods with distinct names and boundaries.

2. That the GLA integrates NDPs into its Housing Zone approaches and the 100,000 units it estimates will be delivered on small sites of less than 0.25 hectares. This not insubstantial number of small sites and other windfall sites are the ones that Neighbourhood Plans could most help in bringing forward.
3. That the GLA appoints a dedicated NDP Officer to progress the above and to provide support to fledgling forums and LPA Planning Officers struggling to deliver their Duty to Support

### **Update on progress in London, March 2015 - Department of Communities and Local Government**

As of March 2015, in London:

- 85+ areas interested in Neighbourhood Planning
- 49 areas designated as Neighbourhood Forums
- 2 Neighbourhood Plans had passed Examination in Public
- 1 Neighbourhood Plan had passed referendum and is in force

DCLG has now introduced regulations to speed up the process of Local Planning Authorities recognising Neighbourhood Forums. From receipt of application the authority must decide within:

- 20 weeks where the area falls within the areas of two or more local planning authorities
- 13 weeks in all other cases

The time period runs from the date immediately following that on which the application is first publicised by the local planning authority.

An additional £12 million (nationally) of funding has been announced for 2015/16

- £5k for each area designation
- £5k for each forum designation
- £5k for each plan submitted to local authority
- £20k for each successful examination
- Plus £10k for successful business examination

Average cost of Examination in Public is £7,500

Average cost of referendum is under £5,000

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# Subject: Planning Committee Work Programme

**Report to: Planning Committee**

**Report of: Executive Director of Secretariat**

**Date: 18 March 2015**

**This report will be considered in public**

## 1. Summary

- 1.1 This report sets out Committee work undertaken in 2014/15, previously agreed priorities, and a list of topics that may form the basis of developing a work programme for the coming Assembly Year.

## 2. Recommendations

- 2.1 **That the Committee notes this report that sets out work completed in the Assembly Year 2014/15 (paragraph 3.2).**
- 2.2 **That the Committee notes the topics being considered in the ongoing work towards drafting a full workprogramme for 2015/16 (paragraphs 4.4 – 4.10).**
- 2.3 **That the Committee delegates authority to the Chair in consultation with the Deputy Chair to agree a work programme for approval at the next Committee meeting on 16 June 2015.**
- 2.4 **That the Committee delegates authority to the Chair in consultation with the Deputy Chair to agree the main item for the next Committee meeting on 16 June 2015.**

## 3. Background

- 3.1 The Committee receives a report monitoring the progress of its work programme at each meeting.
- 3.2 Much of the work in 2014/15 focussed on the various implications arising from London's unprecedented recent growth. A number of meetings reviewed subjects that ultimately contributed to the revision of the London Plan (including the Examination in Public) and the development of the Mayor's Infrastructure Plan.
- 3.3 The Planning Committee undertook the following work in 2014/15:
- **Protection of London's Green and Open Spaces:** The Committee meeting on 28 January gave Members the opportunity to assess whether the protections to green and open space need to be altered or strengthened in the London Plan.
  - **Consultation on Draft Further Alterations to the London Plan (FALP):** The Committee met on 25 February to discuss a number of key policy proposals contained in the Draft FALP.

The resulting information was used in the Committee's response to the consultation (published on 10 April 2014).

- **London's Mixed and Balanced Communities:** On 25 February, the Members discussed the policy objective of promoting communities balanced by tenure and household income as set out in the London Plan and agreed to commence further work to assess the extent to which this is being achieved. Members delegated authority to the Chair, in consultation with the Deputy Chair, to agree the next steps of the project that will be carried forward into the Committee's work programme.
- **Density of New Housing Development in London:** The Committee met with experts from the fields of architecture, planning, urban design, academia and the GLA on 11 March 2014 to discuss the definition of density, the state London's housing density, challenges to delivering supporting infrastructure, the impact of the density matrix on land values, alternative configurations to accommodating higher density and whether the London Plan should be revised to include policies that influence density.
- **Long Term Infrastructure Investment Plan for London:** In June 2014, the Planning Committee wrote to the Mayor containing a number of recommendations on what his draft infrastructure plan should contain. The letter also included a memorandum that provided additional context and detail, based on a number of meetings undertaken by the Committee since November 2013. The Committee met experts to discuss the Mayor's consultation on the London Infrastructure Plan 2050 on 14 October 2014, and responded formally to the proposals in November 2014.
- **Examination in Public of Draft Further Alterations to the London Plan (FALP):** The Committee undertook to examine the Draft FALP in public in meetings on 1 July and 14 October 2014, wrote a set of submissions to the Examination in Public during the August recess, and participated in a number of sessions of the EiP in September.
- **Tall buildings and London's skyline:** On 10 June 2014, the Committee met to discuss with experts the reasons behind a growing number of proposals for tall buildings and ways in which the planning system can manage this apparent trend.
- **Old Oak Common and Park Royal Mayoral Development Corporation:** The Committee responded to the Mayor's public consultation on the Old Oak Common and Park Royal MDC based on a discussion with experts on 1 July 2014. On 17 December 2014, the Assembly met to consider the Mayor's proposals to designate a Mayoral development area at Old Oak and Park Royal, and did not vote to reject these proposals.
- **Permitted Development Rights:** The Committee responded to Government's Consultation on Technical Consultation on Planning on 14 October 2014.
- **The Mayor's Strategic Planning Decisions:** The Committee heard from, and put questions to, a number of invited experts on the exercise of the Mayor's strategic planning decisions powers on 18 November 2014.
- **Localism in London - What's the Story?** Produced on 20 November 2014, the Planning Committee's report 'Localism in London – What's the Story' reviewed the evidence, three years on from the introduction of the Localism Act 2011. It found that there has been slow progress in the uptake of devolving powers to local communities as the legislation was designed primarily for smaller, more homogenous areas than can be found in London. A report following up the responses to the report can be found elsewhere on this agenda.

- **Long term options for accommodating London's growth:** On 22 January 2015 the Committee reviewed the implications for growth on brownfield sites, suburban intensification and greenfield, as well as the issues surrounding the co-ordination of planned growth outside London.

## 4. Issues for Consideration

### Work plan priorities

- 4.1 In the last Assembly year the Committee used three central aspects of strategic planning policy for managing and prioritising its work programme. The three main areas of policy were:
- Undertaking the work for the revision of the London Plan, the Mayor's 2020 Vision and the Infrastructure Plan.
  - Policy documents/guidance supplementary to the London Plan - these documents (SPGs) are aligned to key issues, including open space, accessible London, affordable London, localism, and liveable world city.
  - Opportunity area frameworks –The Mayor's London Plan identifies 33 Opportunity Areas and ten Intensification Areas, 12 of these have published frameworks and the Committee resolved to review further frameworks as they are published for consultation.

### Potential work for 2015/16

#### London Plan related work

- 4.2 With the publication of the Further Alterations to the London Plan it is unlikely that there will be a requirement to review the Plan in 2015. The focus in 2015/16 will most likely be reviewing Supplementary Planning Guidance (SPG) and Opportunity Area Planning Framework Guidance. The following consultations are expected:

#### Supplementary Planning Guidance

- Central Activities Zone Supplementary Planning Guidance (SPG) – July 2015
- Mayor's Housing Supplementary Planning Guidance (SPG) – May 2015

#### Opportunity Area Planning Framework consultations

- Public Consultation on the London Riverside Opportunity Area Planning Framework – 9 February 2015 (closes 24 March 2015)

### Long list of potential topics for 2015/16

- 4.3 As part of maintaining a rolling 12 month workprogramme, a number of potential topics have been identified by Members for future review. These are listed below.
- 4.4 **GLA land and property assets:** The GLA owns a portfolio of 181 land and property assets across London, covering more than 650 hectares. Most of these assets are either currently being disposed of, or are marked as for future sale. However, in February TfL will launch a process to bring forward up to 50 sites with around 10 million square foot of development potential. Members may wish to review how these, and other, sites are meeting the Mayor's policy objectives set out in the London Plan – for example to increase the supply of affordable housing in London, provide sites for new

employment and secure the delivery of community infrastructure etc. The work would build on and complement work planned by the Budget and Performance Committee by looking at wider implications of the disposal strategy for the London Plan.

- 4.5 **Viability of development and the impact on housing targets:** The National Planning Policy Framework recognises that the viability of schemes can be important where planning obligations or other costs are being introduced. In these cases planning decisions must be underpinned by an understanding of viability, ensuring realistic decisions are made to support development and promote economic growth. Where the viability of a development is in question, the guidance is that local planning authorities should look to be flexible in applying policy requirements wherever possible. Members may wish to undertake a short review on how the viability of schemes are being calculated, the variables taken into consideration and the impact on the delivery of housing against the Mayor's London Plan targets.
- 4.6 **London's mixed and balanced communities:** Mayoral planning policy supports communities mixed and balanced by tenure and household income that should be promoted across London which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. The Committee has previously looked at changes in the makeup of London's communities between 2001 and 2011 using census data. Members may wish to undertake a piece of work that maps the extent to which this policy is being delivered in the period since 2011.
- 4.7 **Tall buildings and London's skyline:** London's skyline has changed rapidly over the past decade significantly influencing the character of the city, dividing many over the character, geography and necessity of these buildings. The Committee met in June 2014 to discuss the 236 buildings of more than 20 storeys under construction in London according to New London Architecture (NLA)<sup>1</sup>. Members may wish to undertake a piece of work that builds on last June's work, bringing together disparate opinions on proposed tall buildings and clarifying the Committee's position on planning for future developments.
- 4.8 **Estate Regeneration:** On 12 February the Housing Committee published a report on regenerating housing estates that gives recommendations to the Mayor and Government on best practice for both new-build and renovation schemes for estates. Members could investigate the planning policy implications of these proposals and may wish to hear from key stakeholders on how they will consider the recommendations in light of planned regeneration and new developments in London.
- 4.9 **Social infrastructure provision:** While 'hard' infrastructure such as pipes, sewers and substations is pivotal for supporting the growing population of London, so too is social infrastructure. Social infrastructure is the network of schools, hospitals, parks, religious buildings, community centres, sports clubs, leisure centres and other spaces vital for people's health and welfare in London. The Mayor published a 'Draft Social Infrastructure Supplementary Planning Guidance' in May 2014 which was open to comments until 5 October 2014. Members may wish to hear more about the Guidance in its draft form or wait until the final publication of the Guidance. Members may alternatively wish to engage with a specific element of the Guidance, which covers general planning, health and social care, education, sports and faith requirements.

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<sup>1</sup> London's Growing Up!, NLA Insight Study, 2014, page 63 [http://www.newlondonarchitecture.org/dls/TB\\_B1.pdf](http://www.newlondonarchitecture.org/dls/TB_B1.pdf)

- 4.10 **London’s relationship with the rest of the south east:** London’s predicted growth will add a further 2 million people to the city within the next 20 years. It is becoming increasingly apparent that options to spread this growth beyond London’s boundaries may be necessary for sustainable growth and to relieve pressure on supporting infrastructure. This has been recognised by the Mayor and will form part of the next review of the London Plan. The Mayor has proposed holding a summit with Home Counties council leaders in March, to discuss cooperation on managing the capital's housing growth. The Assembly’s Conservative Group recently published a report that suggested creating new garden suburbs outside London in partnership with county councils to accommodate this growth.<sup>2</sup> Members may wish to review the various options for managing and co-ordinating London’s growth outside the city’s boundaries.

### **Draft Committee timetable of meetings**

- 4.11 The draft timetable of meetings for 2015/16 has been published. This gives the Committee dates for six formal meetings:

16 June 2015	16 July 2015	17 September 2015
17 November 2015	26 January 2016	10 March 2016

- 4.12 A previous BMAC decision established that, if during the year a committee modified its approved work programme and/or number of meetings in response to topical events, and an ad hoc extra meeting was called for, that would be permitted if the Members of the committee concerned agreed; if two or more Members of that committee did not agree to a proposal for an extra meeting, the matter would be referred to the GLA Oversight Committee for determination.<sup>3</sup>
- 4.13 Members are recommended to note the ongoing work towards drafting a full workprogramme for 2015/16 using those topics set out in paragraphs 4.4 – 4.10 above as a basis for discussion.
- 4.14 Members are recommended to delegate authority to the Chair in consultation with the Deputy Chair to agree a work programme for approval at the next Committee meeting on 16 June 2015.
- 4.15 Members are recommended to delegate authority to the Chair in consultation with the Deputy Chair to agree the main item for the next Committee meeting on 16 June 2015.

## **5. Legal Implications**

- 5.1 The Committee has the power to do what is recommended in this report.

## **6. Financial Implications**

- 6.1 There are no direct financial implications to the GLA arising from this report.

<sup>2</sup> Southern Powerhouse, January 2015 <http://glaconservatives.co.uk/wp-content/uploads/2015/01/southern-powerhouse.pdf>

<sup>3</sup> <http://www.london.gov.uk/moderngov/documents/s36184/Committee%20Timetable%202014-15.pdf>

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**List of appendices to this report:** none

**Local Government (Access to Information) Act 1985**

List of Background Papers:

None

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