

# GREATER LONDON AUTHORITY

## REQUEST FOR MAYORAL DECISION – MD3340

### London Green Belt review funding

#### Executive summary:

The government has set out its ambition to significantly increase the supply of housing. This includes a requirement for London to plan for 880,000 homes, equivalent to 10 years' housing need. This is a significant increase beyond the previous target; and is broadly equivalent to the number of homes delivered between 1991 and 2023.

In support of this ambition, the December 2024 version of the National Planning Policy Framework (NPPF) introduced various new requirements for local planning authorities. The changes to national policy require any shortfall in both housing and other development needs to be met through Green Belt release; and requires that the Green Belt be reviewed and alterations proposed. In December 2024, a national grant fund was established to address the additional resourcing requirements on planning authorities resulting from the NPPF changes.

This decision seeks approval to receive grant funding from the Ministry of Housing, Communities and Local Government (MHCLG); and subsequent expenditure to support the preparation of a London-wide Green Belt review. This expenditure will cover agency staffing costs and the provision of specialist consultancy support to undertake the work. This work will underpin policy development for the next London Plan. The grant-fund award decision was due to be announced by MHCLG in mid-February 2025, but at the time of writing has not yet been published. The final amount awarded will depend on the number of successful, eligible local authorities. However, if the maximum grant was awarded to the 12 boroughs who are a party to the London-wide strategic, joint Green Belt review, this could be up to £840,000.

#### Decision:

That the Mayor approves the receipt of grant funding of up to £840,000 from the Ministry of Housing, Communities and Local Government; and subsequent expenditure of funds, contained within the grant sum received and any existing budget provision, to cover:

- agency staffing costs (up to £75,000)
- procurement of specialist consultancy support (up to £681,000)
- a contingency (up to £84,000) to deliver a London-wide Green Belt review, to be completed in 2025-26.

This will deliver individual reviews on behalf of each of the 12 boroughs included in the GLA's joint strategic review process, together with an overarching strategic London-wide assessment to inform the preparation of the next London Plan.

#### Mayor of London

I confirm that I do not have any disclosable pecuniary interests in the proposed decision and take the decision in compliance with the Code of Conduct for elected Members of the Authority.

The above request has my approval.

Signature:



Date:

26/2/25

## **PART I – NON-CONFIDENTIAL FACTS AND ADVICE TO THE MAYOR**

### **Decision required – supporting report.**

#### **1. Introduction and background**

- 1.1. The government has set out its ambition to significantly increase the supply of housing. This includes a requirement for London to plan for 880,000 homes, equivalent to 10 years' housing need. This is a significant increase beyond the previous target; and is broadly equivalent to the number of homes delivered between 1991 and 2023.
- 1.2. Meanwhile, the December 2024 version of the National Planning Policy Framework (NPPF) introduced various new requirements for local planning authorities (LPAs). One such requirement, relating to Green Belt land, stipulates that where the need for housing and other development cannot be met through other means, the Green Belt should be reviewed; and alterations to it proposed to meet these needs in full.
- 1.3. The Mayor is clear that the next London Plan must continue to optimise delivery of housing on brownfield sites first. However, in the context of the scale of the housing target and the government changes to NPPF, the GLA is proposing to undertake a London-wide Green Belt review as part of the work of developing the next London Plan to ensure a full understanding of both London's Green Belt and newly distinguished Grey Belt land.<sup>1</sup> It is considered that this represents the most appropriate way to respond to the new national obligations.
- 1.4. However, if the necessary evidence from such a review is to inform the next London Plan, it must be expedited to meet the programme timeline of the next London Plan preparation, where a draft London Plan is due to be published for consultation by 1 March 2026.
- 1.5. A strategic approach to the Green Belt review is proposed for several reasons:
  - London's housing need is apportioned as housing targets across all of London's planning authorities by the Mayor in his London Plan. As such, all areas of Green Belt need to be reviewed in a consistent manner, in light of these new requirements.
  - A London-wide Green Belt review would allow the preparation of evidence-gathering, to underpin the Strategic Housing Land Availability Assessment; and to help demonstrate how London's housing needs will be met.
  - Building on existing knowledge and evidence, it would allow for a consistent approach, based on robust methodology that would allow for timely preparation to inform the next London Plan.
  - Such an approach would optimise opportunities for cross-boundary working; and provide savings through working at scale.
  - It would also reduce the administrative burden on individual boroughs by removing the requirement for individual commissions; and provide the greater oversight and convening powers of the GLA.
- 1.6. In recognition of the additional resourcing implications associated with the new requirements on planning authorities, a national grant fund to support the production of Green Belt reviews was announced in December 2024 by the Ministry of Housing, Communities and Local Government (MHCLG). The deadline for Expressions of Interest (EOIs) was 17 January 2025. The total funding will

---

<sup>1</sup> The NPPF defines a new category of "Grey Belt" – this is land in the Green Belt that comprises previously developed land and/or any other land that, in either case, does not strongly contribute to certain purposes as set out in the NPPF. The NPPF further sets out (at paragraph 148) that, where it is necessary to release Green Belt land for development, plans should prioritise previously developed land; then consider Grey Belt land that is not previously developed; and then other Green Belt locations.

be evenly split by MHCLG across all eligible LPAs who have applied across England, up to £70,000 per LPA.

- 1.7. In launching the EOI process, MHCLG noted specifically that reviews would benefit from being conducted jointly across authorities; and that for London, the Mayor should consider leading this process. In the case of a joint submission, the lead authority would receive and be responsible for the funds as well as monitoring. The amount awarded will therefore depend on the number of LPAs that are a party to any joint submission. This was due to be confirmed by MHCLG on 10 February 2025 but at the time of writing no formal announcement had yet been made.
- 1.8. In London, 18 boroughs have designated Green Belt land. After writing to each of these boroughs, 14 boroughs agreed to work alongside the GLA as part of its joint submission. Four declining to be a party to the process (Bromley, Croydon, Ealing and Hillingdon). After receiving in-principle agreement from the GLA's Deputy Mayor for Planning and Regeneration, and the Chief Finance officer, GLA officers submitted an EOI for funding to MHCLG to conduct a London-wide Green Belt review.
- 1.9. Individual EOIs were also submitted by Enfield, Bromley, Bexley, Havering, Hillingdon and Kingston-upon-Thames boroughs. In instances where an individual EOI was submitted, the GLA has confirmed to MHCLG that the boroughs should take precedence on funding for that area. This would allow them to commission and produce their own evidence for their areas. These can proceed in parallel with and inform the London-wide study.
- 1.10. In the boroughs that submitted individual EOIs (listed at paragraph 1.9, above), there will be early and ongoing engagement (where the borough is willing) to try to align the approaches; and ensure that any local evidence can be used as far as possible to inform the strategic review. It should be noted that the GLA study will also need to consider these areas when making the London-wide assessment.
- 1.11. Notwithstanding this, the GLA will need to include, in its strategic review, all London boroughs with Green Belt land. This will ensure comprehensive coverage and a consistent approach; and enables the GLA to determine and apportion relevant housing targets in the next London Plan. Funding was therefore sought to support a strategic, London-wide review on behalf of the GLA and the 12 boroughs where no individual EOI was submitted. These boroughs were:
  - Barking & Dagenham
  - Barnet
  - Croydon (noting they did not support the bid)
  - Ealing
  - Haringey
  - Harrow
  - Hounslow
  - Newham
  - Redbridge
  - Richmond-upon-Thames
  - Sutton
  - Waltham Forest.
- 1.12. If the maximum amount is issued, the GLA's submission could result in an award of up to £840,000.

- 1.13. This decision seeks approval to proceed with this project and to receive and use any grant funding awarded by central government to do so.

## **2. Objectives and expected outcomes**

- 2.1. This decision seeks approval for the receipt of grant funding, and subsequent expenditure, of up to £840,000 from MHCLG, for agency staffing costs and the provision of specialist consultancy support to deliver a London-wide Green Belt review, to be completed in 2025-26. The London-wide Green Belt review would represent a critical evidence base to support the development of the next London Plan; and ensure that the Mayor is able to meet his statutory duties for the preparation of a spatial development plan as set out in the Greater London Authority Act 1999 (GLA Act).
- 2.2. The primary objective is for the necessary evidence to underpin the next London Plan, which will be produced in a timely and coordinated manner. This will be fundamental in understanding the potential capacity for housing supply across London. The preparation of this evidence must not impede the publication of a draft new London Plan to meet national requirements, and so must be expedited.
- 2.3. The funding would seek to cover costs associated with:
- specific Green Belt reviews covering the areas party to the joint submission, providing individual reports tailored to each borough to inform local plan making in that location
  - a strategic, London-wide Green Belt report bringing together the findings of each individual report, together with evidence from the 'Green Belt authorities' (all 18 boroughs with Green Belt land)
  - a governance framework to manage delivery and the interaction with elected officials and officers for all relevant boroughs
  - agency resource to cover project implementation and monitoring period or backfill, anticipated to include one temporary post of up to 12 months (this will also be approved in parallel through Establishment Control processes).
- 2.4. The resulting evidence base will incorporate and build upon studies previously undertaken; or, where timeframes align, newly commissioned individual reports by the boroughs to provide up-to-date evidence for all 18 boroughs. The findings from these local assessments will be brought together to inform a single, strategic study to provide a more holistic and integrated approach to assessing the whole of London's Green Belt.
- 2.5. To achieve these outcomes within the necessary timeframes, external specialist support will be procured, in accordance with the Contracts and Funding Code, to manage and deliver the project; and provide support in stakeholder engagement and communications.

## **3. Equality comments**

- 3.1. Under section 149 of the Equality Act 2010 (the Equality Act), as a public authority the Mayor/GLA must have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and to advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not. Protected characteristics under the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage or civil partnership status (the duty in respect of this last characteristic is to eliminate unlawful discrimination only).

- 3.2. Consideration has been given to how the proposed Green Belt review evidence-gathering relates to this duty, and the potential impacts of this decision. London's existing Green Belt land provides a multitude of different functions for its population, including farming areas together with space for recreation and nature. At the same time, London faces a housing crisis. The review process will seek to gather evidence to underpin the next London Plan; and identify opportunities for the delivery of new housing.
- 3.3. This evidence gathering is expected to have an overall positive impact on those with protected characteristics, given that the production and publication of a sound Strategic Spatial Development Plan for London will help to enact numerous policy levers (such as affordable housing and inclusive design requirements) that will shape future development in London. However, as part of any such review, close attention must be given to the role and function of any areas highlighted for potential reclassification; and the resulting impacts of this change upon those with protected characteristics. This will remain a key factor when determining the suitability of land for potential release by boroughs in their local plan-making processes and associated consultation activities.
- 3.4. The Mayor's Equality, Diversity and Inclusion (EDI) strategy sets out how the Mayor will help address the inequalities, barriers and discrimination experienced by groups protected by the Equality Act 2010. The above work programme aligns with the Mayor's EDI strategy objectives (2022). In particular:
- Objective 1 commits to increasing the provision of genuinely affordable homes for the benefit of those groups and communities that are most likely to live in overcrowded, poor-quality or unaffordable housing
  - Objective 2 commits to increase the number of homes that meet Londoners' diverse housing needs including, year-on-year, the pace of provision of affordable specialist and supported housing.
- 3.5. Notwithstanding these considerations, the draft London Plan will be subject to an Integrated Impact Assessment (IIA) (which will include an Equalities Impact Assessment). The procurement for this project will also be subject to GLA procurement frameworks that have been revised to support EDI objectives; and will be designed to capture any EDI implications of the issues under consideration.

## **4. Other considerations**

### Risks

#### *Timescale*

- 4.1. A key risk associated with this project is the associated time constraint and whether this allows sufficient time to successfully collect the robust evidence required for such a large geographic area.
- 4.2. The draft next London Plan must be published by March 2026. Evidence gathering to inform the drafting of the next Plan needs to be concluded well before this point, ideally by the end of August 2025. With funds expected to be issued by MHCLG to eligible LPAs on 19 February and the procedural requirements associated with a procurement of this size, this only allows four to five months for project delivery.
- 4.3. To mitigate this risk, external consultation support will be sought to ensure that sufficient capacity is provided. In addition, a portion of the funds will be used to create temporary staff posts within the GLA's London Plan team to help with programme management and implementation. Early engagement with TfL Procurement will allow some early steps to be taken in advance of the receipt of funds.

### *Environmental impact*

- 4.4. Potential changes to London's Green Belt must be considered carefully against the Mayoral commitments and obligations relating to the environment and nature conservation. Without strategic oversight, the implementation of the new NPPF requirements has the potential to allow for Green Belt reclassification or release in an ad hoc and unmanaged way. This could result in unsustainable forms of development.
- 4.5. As set out in the Mayor's response to the [draft NPPF in September 2024](#), GLA officers will seek to mitigate this risk by taking a strategic approach to the review of London's Green Belt, as set out in this Decision.
- 4.6. Findings from the review will need to be considered fully as part of the London Plan Integrated Impacts Assessment and Habitats Regulation Assessments. Furthermore, any formal alterations to Green Belt boundaries will need to be progressed through local plan-making processes, which will be subject to similar further assessments.

### *Key stakeholder objections*

- 4.7. Despite the Green Belt requirements being set at a national level, there are risks related to the interests of in scope boroughs. These will be mitigated by following:
  - Agreeing that individual borough Expression of Interest (EOI) submissions will take precedence in terms of funding allocation; and that boroughs can bring forward their own evidence for local plan making. Boroughs that have opted for the individual EOI approach have also been invited to be involved in the strategic process, where they are willing.
  - Regular discussions with individual boroughs during the evidence gathering process to ensure they are kept well informed of emerging results throughout the process.
  - The GLA will set up a steering group which will include representatives from each of the boroughs who are a party to the joint Green Belt submission.
- 4.8. Notwithstanding these mitigations, as is common with many issues associated with the preparation of a long-term strategic land use strategy, there will inevitably remain tensions and different views about the evidence. It would ultimately be through the process of the Examination in Public of the London Plan that any points of disagreement would be debated in a public forum, and determined by the Secretary of State and their appointed inspector.

### *Procurement*

- 4.9. The risks associated with the procurement and management of external projects include the following:
  - The capacity of the TfL Procurement team to support a procurement exercise of this size, given the high number of ongoing projects to inform the London Plan; and disruption and delays to the TfL Procurement team's usual processes and standards, arising from the new requirements of the Procurement Act 2023. This has been addressed through early conversations with Procurement teams, and by having one point of contact for managing projects.
  - No suppliers bidding: this has been minimised through allowing reasonable time for bidders to put together bids, and inviting suppliers to form consortiums to ensure that sufficient capacity is available.
  - Projects outputs are not in line with expectations: this will be addressed through detailed specifications, with clear outputs and robust project-management processes.
  - Slippage once consultants are in place: this will be addressed through clear project management procedures, including clear milestones and regular reporting.

## *Financial*

- 4.10. Given that the final amount awarded by MHCLG has not yet been revealed, there remains a risk that the amount awarded may not fully cover the costs of a project of this scale. In this event, there is sufficient money in the London Plan budget to cover additional work for the London Plan evidence base, if required, which could be used to cover the difference.
- 4.11. MHCLG has been clear that it intends for the funding of awards to fully remove additional financial burdens on LPAs arising from this work. Therefore the expectation is for the full funding award (£840,000) for the 12 boroughs that did not submit an individual EOI. The main area of potential funding deficiency would be in relation to the other six boroughs (see paragraph 1.9, above). Given the imperative to complete this evidence in time to inform the next London Plan, the use of GLA London Plan budget, if needed, would be warranted and the shortfall should not be too significant.

## Links with Mayoral strategies and priorities

- 4.12. There are several Mayoral strategies with shared priorities and objectives that will align with the overarching strategy and spatial elements in the next London Plan. The next London Plan will seek to reflect the priorities of the Mayor's London Growth Plan (due for publication in February 2025) and other strategic objectives. As a key evidence base project for the next London Plan, the strategic Green Belt review will be developed with input from other GLA teams, including transport, infrastructure, housing and land, and environment, to ensure that Mayoral priorities are reflected.

## Impact assessments and consultations

- 4.13. In preparing or altering the London Plan, the Mayor has legal duties to consider the following:
- economic development and wealth creation (GLA Act)
  - social development (GLA Act)
  - protection and improvement of the environment (Levelling Up and Regeneration Act 2023)
  - habitats (Conservation of Habitats and Species Regulations 2017)
  - the Environmental Assessment of Plans and Programmes Regulations 2004 (GLA Act)
  - health inequality and promoting Londoners' health (GLA Act)
  - community safety (Crime and Disorder Act 1998, Police and Justice Act 2006)
  - equality of opportunity, elimination of discrimination and the promotion of good community relations (GLA Act, Equality Act 2010).
- 4.14. The London Plan Team will prepare an integrated approach to demonstrate how these duties have been considered in the form of an IIA and a Habitats Regulation Assessment. Due to changes to legislation and government, there is currently some uncertainty as to what specifically will be required in an IIA. This will be prepared alongside the development of the next London Plan; and will include consideration of the outcomes of the evidence from this project. The London Plan team will work with boroughs to share findings of evidence base projects, where possible, in advance of publication.
- 4.15. There are no actual or perceived conflicts of interest with any person involved in drafting or clearance of this Decision Form.

## 5. Financial comments

- 5.1. Approval is requested for expenditure of up to £840,000 for staffing costs and specialist consultancy services. The expenditure to deliver this project will occur in 2025-26. The maximum expected profile of the spend is set out in the table below. A contingency of 10 per cent of the overall maximum spend has been provided across all projects to cover unforeseen additional costs and/or to allow headroom for any small extensions of contract that may be required. All relevant budget adjustments will be made.

| Project element                                                                                                                          | Outcomes                                                                                                                                                                     | Budget spend (2025-26) |
|------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| Agency resource to cover temporary GLA position                                                                                          | Temporary resourcing of a planner role for up to 12 months (anticipated 1x G9 principal planner) to support with project governance, implementation, backfill and monitoring | £75,000                |
| Procurement of external consultant support to aid in the delivery of Green Belt reviews, stakeholder engagement and programme management | Strategic London-wide review (informed by outcome of local reviews)                                                                                                          | £681,000               |
|                                                                                                                                          | Individual borough Green Belt reviews (x12)                                                                                                                                  |                        |
| <b>Sub total</b>                                                                                                                         |                                                                                                                                                                              | <b>£756,000</b>        |
| Contingency @ 10 per cent                                                                                                                |                                                                                                                                                                              | £84,000                |
| <b>Total</b>                                                                                                                             |                                                                                                                                                                              | <b>£840,000</b>        |

- 5.2. Depending on the fund award, it is anticipated that this expenditure should be fully funded by the grant funding provided by MHCLG (expected to be issued in February/March 2025). Should the amount awarded be insufficient to fully cover the anticipated costs, the difference in funding would be drawn from the existing London Plan budget. If this is also insufficient, the plan will be contained within the available funding. The grant funding awarded would be received and managed under the London Plan budget for 2025-26.
- 5.3. Although much of the funding for this project is to come from MHCLG, the GLA intends to contribute funding up to £120,000, in an instance where the MHCLG funding award is insufficient to cover the full costs of the project. This amount is included in the London Plan 2025-26 budget. However, these budgets are not yet formally approved and are therefore subject to change.

## 6. Legal comments

- 6.1. Section 334 of the GLA Act requires the Mayor to prepare and publish a Spatial Development Strategy (known as the London Plan) and section 339 of the Act requires the Mayor to keep the London Plan under review, especially matters that may be expected to affect the development of Greater London or the planning of its development.
- 6.2. The decision requested of the Mayor to collate the evidence base to support the London Plan also concerns the exercise of the GLA's general statutory powers under section 30 of the GLA Act to do such things considered to further, or that are facilitative of, or conducive or incidental to, the promotion of economic development and wealth creation, social development, or the improvement of the environment in Greater London.
- 6.3. In formulating the proposals in respect of which a decision is sought officers must comply with the Authority's related statutory duties to:

- pay due regard to the principle that there should be equality of opportunity for all people
- consider how the proposals will promote the improvement of health of persons, health inequalities between persons and to contribute towards the achievement of sustainable development in the UK
- consult with appropriate bodies.

- 6.4. The GLA also has a subsidiary power, pursuant to section 34 of the Act, to do anything that is calculated to facilitate, or is conducive or incidental to, the exercise of any of the statutory functions of the Authority. In this case this piece of work to collate the evidence base to support the London Plan is incidental to its section 30 powers defined above, as well as its powers under section 334 and 339 of the Act.
- 6.5. In taking the decision requested, the Mayor must have due regard to the Public Sector Equality Duty; namely the need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010. Throughout the process outlined above in particular section 3, due regard will need to be had to the equality impact considerations and mitigations.
- 6.6. The services required will be procured in consultation with TfL Procurement, who will determine the detail of the procurement strategy to be adopted in accordance with the Authority's Contracts and Funding Code. Officers must liaise with TfL Procurement in this regard and to ensure all necessary contract documentation is put in place and executed before commencement of services.

## 7. Planned delivery approach and next steps

- 7.1. The work will be delivered according to the following timetable, though this may be subject to change depending on the timing of the announcement of grant funding award:

| Activity                                                                                  | Timeline                                               |
|-------------------------------------------------------------------------------------------|--------------------------------------------------------|
| Funding award announcement                                                                | To be confirmed – expected before end of February 2025 |
| Receipt of funding                                                                        |                                                        |
| Procurement of contracts                                                                  | End of February – end of March 2025                    |
| Agency resource appointment                                                               | End of February – end of March 2025                    |
| Announcement                                                                              | End of April 2025                                      |
| Delivery start date for project                                                           | End of March – early April 2025                        |
| Delivery end date for project                                                             | September 2025                                         |
| Implementation of project findings through London Plan development and project monitoring | September 2025 – February 2026                         |
| Closure of all projects                                                                   | February 2026                                          |

## Appendices and supporting papers:

None.

## Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

## Part 1 – Deferral

### Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason: To delay until procurement(s) have been completed to ensure that competitive bids are received and to ensure that the announcement does not coincide with planned consultation activities to support the development of the next London Plan.

Until what date: 28 April 2025

## Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

### Is there a part 2 form? NO

## ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

### Drafting officer:

John Diver has drafted this report in accordance with GLA procedures and confirms the following:

✓

### Sponsoring Director:

Philip Graham has reviewed the request and is satisfied it is correct and consistent with the Mayor's plans and priorities.

✓

### Mayoral Adviser:

Jules Pipe has been consulted about the proposal and agrees the recommendations.

✓

### Advice:

The Finance and Legal teams have commented on this proposal.

✓

### Mayoral Delivery Board

This decision was agreed by the Mayoral Delivery Board on 17 February 2025.

✓

## CHIEF FINANCE OFFICER:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

### Signature:

*Fay Hammad*

### Date:

25/02/2025

## CHIEF OF STAFF:

I am satisfied that this is an appropriate request to be submitted to the Mayor.

### Signature:

*D. Bellamy*

### Date:

18/02/2025