

ORGANISATION: LONDON CHAMBER OF COMMERCE AND INDUSTRY (LCCI)

ID: 2995

MATTER 65 (M65): GREEN BELT AND METROPOLITAN OPEN LAND

Green Belt and Metropolitan Open Land

M65. Would Policies G2 and G3 provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the policies and detailed criteria justified and necessary and would they provide an effective basis for development management? In particular:

a) Is Policy G2 on London's Green Belt consistent with national policy and, if not, is this justified?

Introduction

In our 2014 Housing report¹ LCCI noted there was a need to consider how the undersupply of housing could affect future London resilience. Two years later our research found that the majority (54%) of London's 'blue light' emergency services workers – police officers, firefighters, ambulance paramedics – live outside London².

At that time, we called on the Mayor of London to consider how this finding could impact on London's ability to deal with a major incident. This also raised questions around the capital's resiliency, and its ability to deal with matters of extended duration including, power network failures, industrial action, health pandemics and adverse weather conditions.

Consequently, LCCI then embarked on identifying land which could be effectively utilised to house London's emergency services workers, especially given the finite amount of space in the capital – leading to the publication of Brown for Blue³. This report focused primarily on brownspace⁴ in the 22% of London – across 19 boroughs – that lies within the Metropolitan Green Belt.

Contained within this 22% of land is up to 329 hectares of brownspace, that most crucially LCCI identified the potential for up to 20,000 newbuilds that could be used to home the men and women in our police, fire and paramedic services. As part of this report, LCCI commissioned research that found 69% of businesses support emergency services housing

¹ Getting our house in order: The impact of housing undersupply on London businesses – May 2014

² Living on the edge: Housing London's Blue Light emergency services – June 2016

³ Brown for Blue: Land to house London's emergency services workers – December 2017

⁴ LCCI adopted the term 'brownspace' to define land in the Metropolitan Green Belt, within London, that is disused or has poor quality land use. For the London context, this has been conceptualised as:

- Vacant, unused or derelict sites
- Land with poor quality use, including scrap and car breakers' yards, quarries, gravel and sand pits, storage yards (including builders' yards, car parking and other run-down sites with sheds or workshops), nearly full landfill sites and lorry and transport yards.

on poor quality Green Belt⁵.

The draft new London Plan provides the ideal platform for a serious conversation on the use of the capital's finite space. This, LCCI advocates, should include a review of London's Green Belt. Policy G2 of the Mayor's London Plan should be amended to ensure consistency with national policy as presented in the National Planning Policy Framework (2012).

We also suggested that the London Plan should identify the need for specialist emergency services worker housing as an important planning issue for London.

Our response to London Plan in March 2018 responded to a number of key areas contained within the Mayor's draft new London Plan, however, Matter 65 is a key priority for London's resilience which LCCI argues must be addressed.

Consistency with national policy

The Government's NPPF (2012) states that the Green Belt's purpose is "to assist in urban regeneration, by encouraging the recycling of derelict and other urban land" (Paragraph 80).

NPPF (2012) also states that "Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the London Plan' (Paragraph 83)". Policy G2 of the Mayor's draft new London Plan is therefore inconsistent with national policy, thus unsound, we would argue.

Additionally, LCCI would argue that policy G2 of the draft London Plan fails the test of soundness, as it does not conform to paragraph 80 of the NPPF (2012), specifically encouraging the recycling of derelict land.

The Mayor's draft new London Plan in ruling out development on London's Green Belt, without first providing a mechanism for either local reviews or wider strategic review is in our view unjustified.

Exhausting all options to meet current and future demand for housing

As part of the evidence base for the London Plan, the Strategic Housing Land Availability Assessment has shown that London has the capacity to deliver up to 64,935 homes per year⁶. However, the Mayor of London has identified the need for 66,000 completions per year to meet demand. Given the shortfall of 1,065 homes per year, it is essential that all possible options are exhausted in order to meet demand.

Given this shortfall, coupled with the fact that some outer London boroughs have seen a doubling of target rates for housing delivery per year, despite not having met previous targets, it remains an unrealistic goal without a fundamental step change in policy making otherwise the Plan will fail to deliver sustainable development which is the 'golden thread' of the NPPF (2012).

⁵ ComRes survey for LCCI of 569 London businesses (August-September 2017)

⁶ The London Strategic Housing Land Availability Assessment 2017, pp. 1

Furthermore, it is clear from paragraph 2.3.1 of the draft London Plan (minor suggested changes version⁷) that London cannot accommodate all of its anticipated growth without intruding on the Green Belt. NPPF (2012), also follows the logic that firstly, housing need should be met within existing boundaries, if not, then wider collaboration with surrounding areas should be explored.

From discussions at the Matter 11 session held on 22 January 2019, it is clear that as the forecast unmet housing demand is projected to be in the range of 1,000 and 10,000 homes over the plan period. Surrounding areas are not capable of delivering on London's making good London's failure to meet its own housing need. It was said that market housing targets are being met but that the GLA have fallen short of meeting affordable housing targets. It is essential that affordable housing targets are met in order to deliver the homes required for capital's emergency services workers.

Putting the burden on surrounding local planning authorities would result in an entirely different London Plan being proposed and could no longer be considered a 'London' Plan. Therefore, if housing demand still cannot be met, then London's Green Belt should be utilised in exceptional circumstances, consistent with national policy.

A more effective, strategic option

It is not news that the draft housing targets are ambitious in order to combat the current housing crisis. This crisis can be overcome much more easily in the short, medium and long term if a more strategic and effective option had been reviewed earlier on in the process of preparing this London Plan.

Utilising both mapping specialists and Freedom of Information requests, LCCI found that across the 19 boroughs that include land within London's Metropolitan Green Belt, there are 329 hectares of brown space is contained (please see **annex 1** below for 'Brown space in the Green Belt' map). This land could be used to accommodate up to 20,000 homes.

Consequently, LCCI would advocate each of the 19 London Boroughs commit to review their respective Green Belts, through their respective Local Plans in accordance with the newly revised NPPF. There are already examples of outer London Boroughs that are considering Green Belt or Metropolitan Open Land release⁸.

Methodology

All 19 LPAs should assess London Plan housing need and target against capacity. Firstly, they should be required to produce a Capacity Study. Where they fail to demonstrate capacity to meet target, a Green Belt Review must be undertaken to demonstrate very special circumstances. This should be on a borough-by-borough basis with boroughs jointly agreeing on how to consistently conduct Green Belt reviews.

⁷ This Plan aims to accommodate ~~all~~ **the vast majority** of **London's growth** within its boundaries without intruding on its Green Belt or other protected open spaces. As with any successful urban area this does not mean that in- and out-migration will cease, but that as far as possible sufficient provision will be made to **accommodate the projected growth within London**

⁸ Hounslow 165%, Hillingdon 178%, Bexley 179% and Merton 22% <https://www.london.gov.uk/press-releases/mayoral/sadiq-calls-for-drastic-government-action>

We note that if the draft London Plan is adopted, it will be subject to immediate review. This will mean reconfigured housing targets which will delay the process of fixing the housing crisis in the short-term. Therefore, LCCI propose that the 19 LPAs are required to undertake the above assessments within 12 months of the adoption of the London Plan to ensure that its impending review does not slow down the overarching objective to provide more homes that Londoners need.

Key workers and affordable housing in London

LCCI research found that 54% of London's 'blue light' emergency services workers live outside the capital. This not only raises questions over the capital's resilience, but also places additional strain on an already overcrowded and congested transport network as a result of having to commute in and out of London.

Furthermore, in discussions with representatives of London's emergency services workers, it is also the shortage of affordable homes that is impacting on both recruitment and retention of public service workers, raising additional concerns about the potential impact of the housing crisis upon the resiliency of London and its economy.

LCCI suggests that by specifying a 'blue light housing' need in the draft new London Plan, the Mayor could take an active role in developing the stock needed to house London's emergency service workers.

Conditions could be put on these developments to ensure blue light housing is provided that is genuinely affordable to rent for some front-line staff. LCCI suggest homes are designated as rental in order to ensure they stay in use for their intended purpose.

Notably, given the ongoing considerations about future funding of London, a portfolio of rental homes under GLA control would provide a revenue stream for City Hall.

Conclusion

LCCI recognises that any discussion of making mention of 'building' and 'Green Belt' is contentious. However, LCCI suggest a limited intervention, with suitable safeguards, to make best use of poor quality and undesirable land to help house London's emergency workers while bolstering the capital's resiliency, should matter of extended during arise.

Therefore, LCCI through its formal response to the London Plan in March 2018 and now after been called to appear before the Examination in Public, specifically on Matter 65, argue that the draft London Plan should include a review of London's Green Belt. This would be specifically for specialist emergency services worker housing, in order to address resiliency concerns in London.

BROWNSPACE IN THE GREEN BELT

The term 'brownspace' was coined by London Chamber of Commerce and Industry (LCCI) to define land that is currently disused or has a poor quality land use, focusing particularly on land within Greater London's Metropolitan Green Belt.

LCCI has called on the Mayor and boroughs to audit and map this land, to assess if it could be developed to better serve the capital's needs.

In 2017, LCCI commissioned mapping specialists FIND to identify all brownspace in the Greater London Metropolitan Green Belt. Three types of brownspace were identified: vacant or derelict brownfield land previously identified in the Government and Mayor's databases; other vacant, unused or derelict brownspace sites; and brownspace sites with a poor quality land use including scrap and car breakers' yards, quarries, gravel and sand pits and nearly full landfill sites.

For more information please visit londonchamber.co.uk/BrownforBlue

