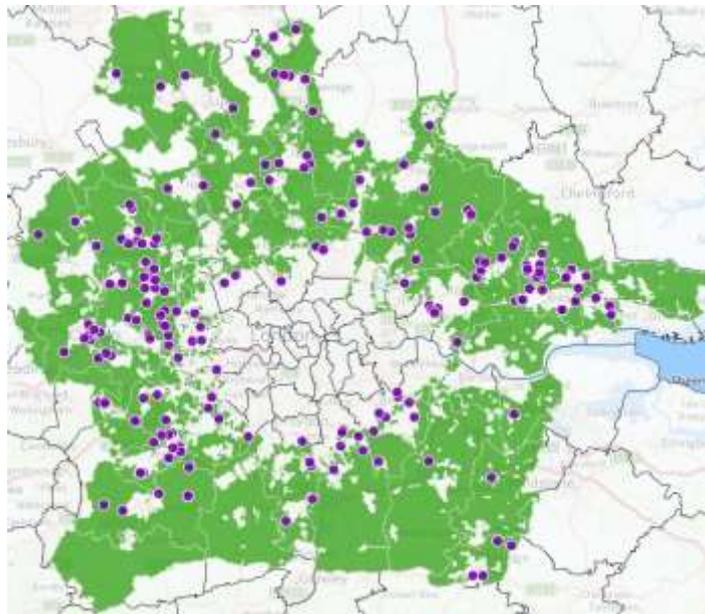


The accelerating loss of London's Green Belt - who is to blame?

'Safe under us?' one year on: a review of current threats
September 2017

Threats to the London Metropolitan Green Belt - September 2016



Threats to the London Metropolitan Green Belt - September 2017



Foreword

In our report last year, we pointed out the concerns over the major threats to London's Metropolitan Green Belt.

Unfortunately, many of the predictions we made in that document and which the Department of Communities and Local Government told us were '*speculative and misleading*' have come true.

In this document we show how, as a Local Plan continues through its various stages, more and more Green Belt is being threatened and in many cases taken.

The question is, who is responsible for this attack on our Green Belt?

Is it Government assuming exaggerated housing expectations based on very optimistic growth expectations?

Is it Local Planning Authorities who should be blamed, overstating their growth prospects and being too influenced by financial incentives and/or severe sanctions to build more houses than they can realistically justify?

Is it the Planning Inspectorate who appears to be forcing Local Authorities to consider more and more Green Belt land? Who controls the Inspectorate and what instructions, if any, are they receiving?

Whatever the cause, more Green Belt is being taken and the reasons for so doing are in conflict with Government policy and the National Planning Policy framework which sets out the very limited grounds for allowing development on Green Belt.

Whoever is responsible, the situation is worsening and more of the Green Belt asset is being lost. In our report we conclude that even more Green Belt will be taken during the next twelve months.

The time has come to look for even greater protection for the Green Belt if, once again, our predictions prove to be accurate.

Richard Knox-Johnston

Chair

The London Green Belt Council

Summary and key findings

1. Data analysis and findings

- 2.1 Updated map of sites under threat
- 2.2 Increases in threats - key facts
- 2.3 The link between Local Plan progress and threats to the Green Belt
- 2.4 Case studies: LPAs which have made significant Local Plan progress since 2016
- 2.5 Threats to the Green Belt within Greater London

2. Emerging threats

- 3.1 Increased threats in Local Plans withdrawn due to failure under the 'Duty to co-operate'
- 3.2 Emerging Local Plans and large infrastructure projects
- 3.3 The quality and significance of Green Belt land under threat

3. Why is London's Green Belt under threat?

- 4.1 Local campaigners' commentary on the impact of inflated housing targets and the duty to co-operate
- 4.2 The Housing White Paper

Appendix 1 Threats to the London Green Belt July 2017: Summary table

Appendix 2 The key stages of Local Plan development

Appendix 3 Green Belt LPAs with the greatest Local Plan progress since 2016

Appendix 4 The correlation between Local Plan progress and threats in LPA where there has been little Local Plan progress

1. Summary and key findings

This report updates the research undertaken for our September 2016 report [‘Safe Under Us? - An investigation into widespread threats from housebuilding in the London Metropolitan Green Belt.’](#) It is issued alongside an updated [Map of threats to London’s Green Belt](#) originally published in May 2016, which identifies the locations, and gives details, of sites under threat.

The original 2016 report demonstrated that the London Metropolitan Green Belt (LMGB) was under greater threat than ever before. Research for both the original map and report together with the updates, drew on local evidence provided by members of the London Green Belt Council (LGBC) and CPRE branches in Bedfordshire, Berkshire, Buckinghamshire, Essex, Hertfordshire, Kent, London and Surrey.

One year after *‘Safe under us?’*, our research shows that the pressure on the LMGB has grown at a rapid rate and that, consequently the threat significantly increased since the original 2016 survey.

- The number of Green Belt sites we identified as being under threat from development more than doubled between July 2016 and July 2017, from 203 to 443 (the number of houses proposed on the London Green Belt increased from 123,528 to 163,474)
- The majority of the threats were identified in borough Local Plans showing that there are firm plans to release these sites for housing
- As in 2016, the counties with the greatest number of threats are Hertfordshire (44,974 houses), Surrey (41,760) and Essex (35,674). The 3 Local Planning Authorities (LPAs) with the greatest number of threats are Central Bedfordshire (17,100), East Hertfordshire (16,950) and Basildon (13,035)
- In the 8 LPAs with the largest increases in threats, all had undergone rapid Local Plan progress
- The evidence suggests that the threat numbers will increase further as more Local Plans are progressed, for example where housing targets have been increased in Strategic Housing Market Assessments (SHMAs) but not yet accounted for in Local Plans. Examples of this are Tunbridge Wells and Sevenoaks and LPAs in South East Essex.

The findings of this report reinforce the conclusions in *‘Safe under us?’ (2016)* about how theoretically protected LMGB is coming under threat as a result of Government housing and planning policies. These policies undermine Green Belt protections so allowing the Government to shift responsibility onto local authorities while at the same time giving added financial incentives to those or sanctions to those who do not. (see *‘Safe Under Us?’*).

2017 research particularly underlines how:

- **The Local Plan process is further undermining Green Belt protection.** The threats are contained within Local Plans and have become more numerous and widespread as these plans progress.
- **The combined pressure of ‘Duty to co-operate’ and inflated housing targets** continues to prevent Local Planning Authorities (LPAs) from citing the Green Belt as a constraint, as set out in the national Planning Policy Framework (NPPF), and drives LPAs to release

Green Belt for development with little or no impact on the supply of urgently needed genuinely affordable housing.

Urgent action by Central and Local government and the Planning Inspectorate is needed to preserve the Green Belt's vital role in encouraging urban regeneration and preventing urban sprawl. This is reiterated in recent national CPRE report [*'Green Belt under siege: 2017'*](#) which makes it clear that focusing development on Green Belt land does not create the genuinely affordable homes needed by key workers, young people and families which are urgently needed.

The recommendations from *'Safe Under us?'* are even more pertinent now if irreparable damage to the integrity of London's Green Belt is to be avoided. In addition to last year's proposals we now recommend that:

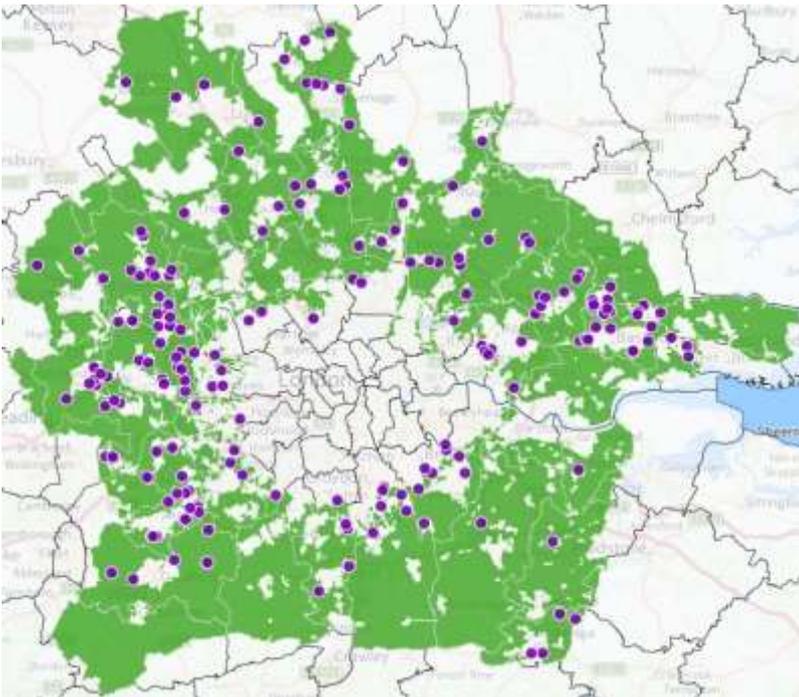
- 1. A Strategic London Green Belt Authority should be established to protect the London Green Belt, and facilitate positive use and restoration of the Green Belt.** Enforcement action should also be introduced to reinstate Green Belt where it has been deliberately allowed to become derelict by those intending to obtain planning permission.
- 2. The methodology for measuring objectively assessed housing need (OAN) should be reformed** to enable LPAs to revisit and where necessary recalibrate housing targets to ensure they are supportable and realistic.
- 3. The 'Duty to co-operate' should be adapted** to make allowances for the many LPAs who share Green Belt with their neighbours in order for local authorities to be able to cite the Green Belt as a constraint.
- 4. To acknowledge that because of its inherent value, Green Belt land will not be able to provide genuinely affordable housing.**

2. Data analysis

In July 2017, 85% of the 66 LPAs in the LMGB were surveyed, compared to 66% in 2016. Detailed data of these LPAs is provided in Appendix 1.

2.1 Updated map of sites under threat

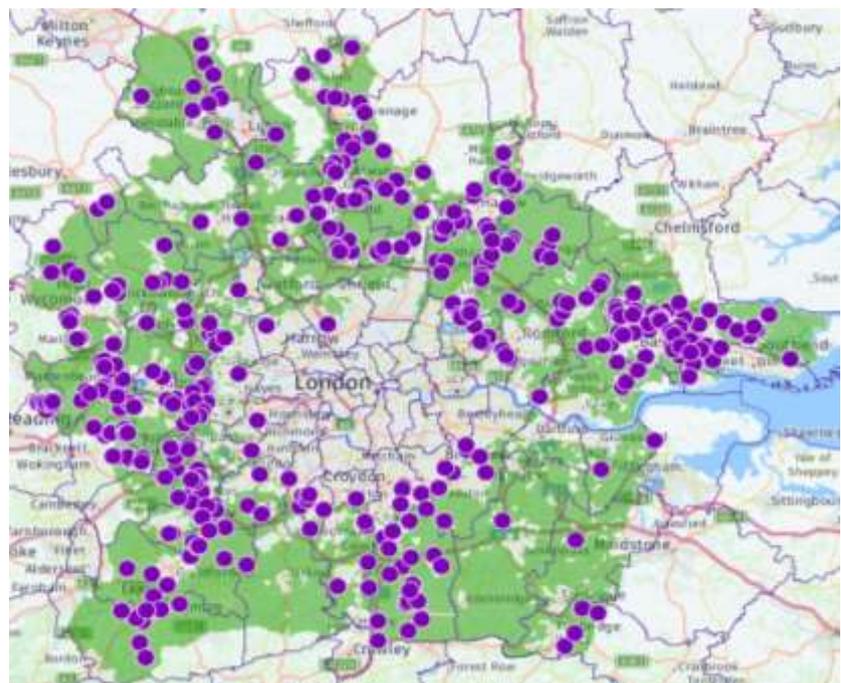
This report is published alongside an updated map of threats which can be viewed at www.londongreenbeltcouncil.org.uk. Each dot on the map gives the location and leads to more detail of the proposals for the site.



Map 1. Threats to London's Green Belt July 2016 showing around 200 threatened sites

Map 2. Threats to London's Green Belt July 2017 showing over 443 threatened sites

(Note that the larger size of dots in this map, compared to the one above, is not intended to emphasise the increased scale of threats: it is simply a result of taking a screen shot from a different digital source).



2.2 Increases in threats - key facts

The number of sites under threat has doubled since our 2016 survey

Figures 1 and 2 below highlight how the increase in the numbers of Green Belt sites threatened with development has more than doubled from 203 to 443 since our 2016 survey.

Figure 1. Increase in the number of LMGB sites under threat from development since the 2016 survey

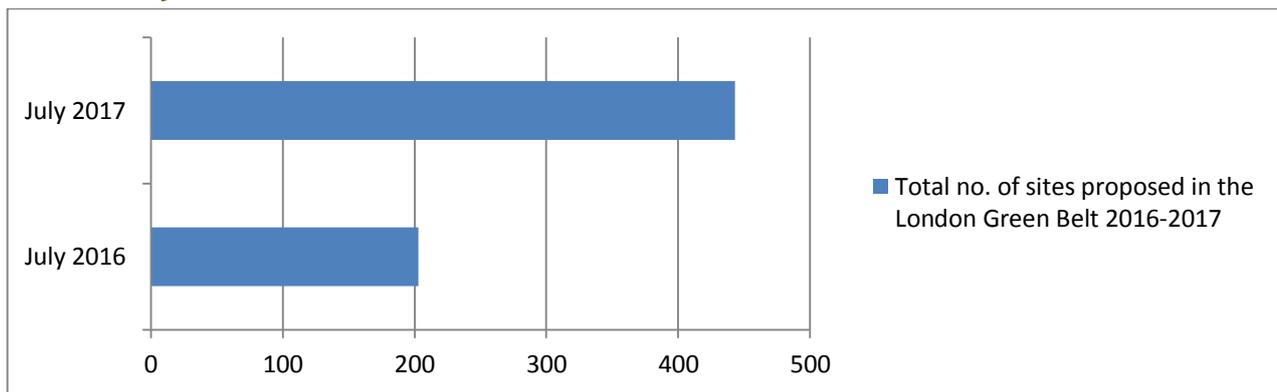
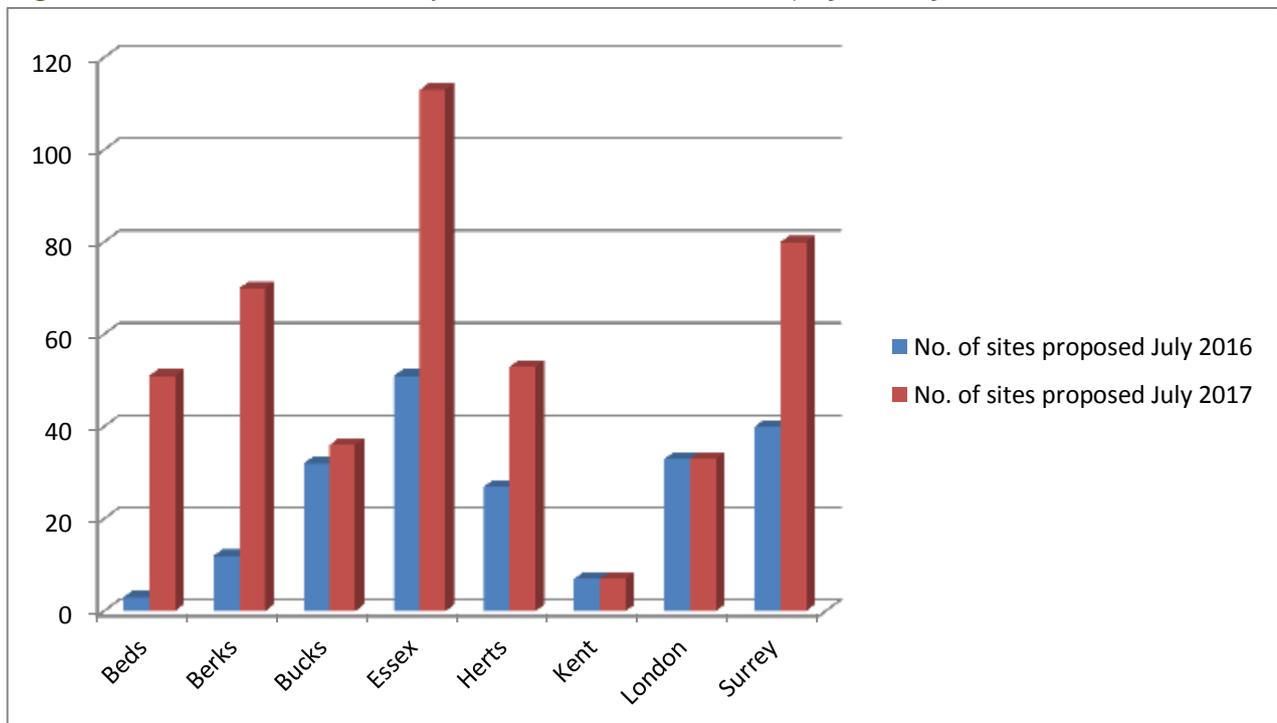


Figure 2. Increase in number of LMGB sites under threat, by county



Number of houses proposed in the LMGB has increased by 33% since the 2016 survey

The number of houses proposed to be built on Green Belt sites has increased by one third (39,946) between the end of July 2016 and the end of July 2017, from 123,528 houses proposed in 2016 to 163,474 in 2017. These figures are broken down by county in Figure 4:

Figure 3. Increase in the total number of houses proposed on the London Green Belt

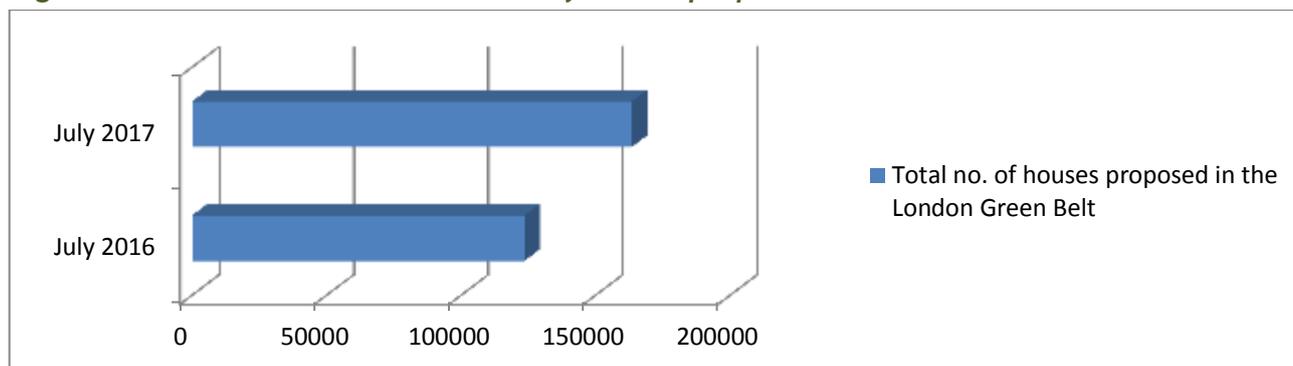
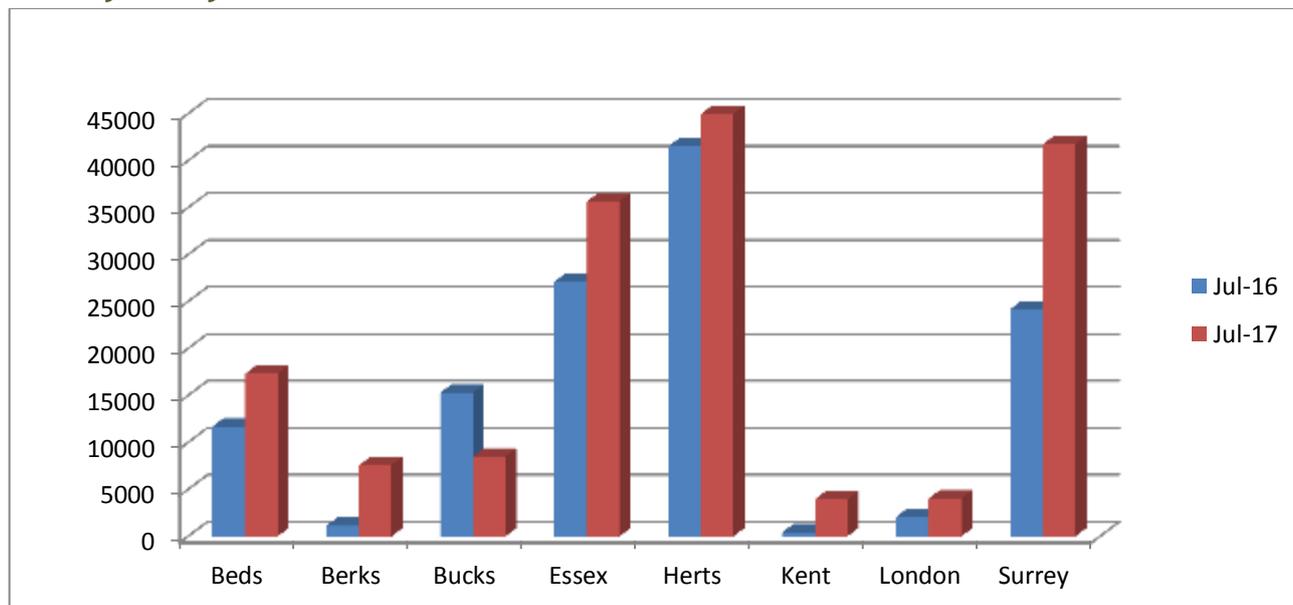


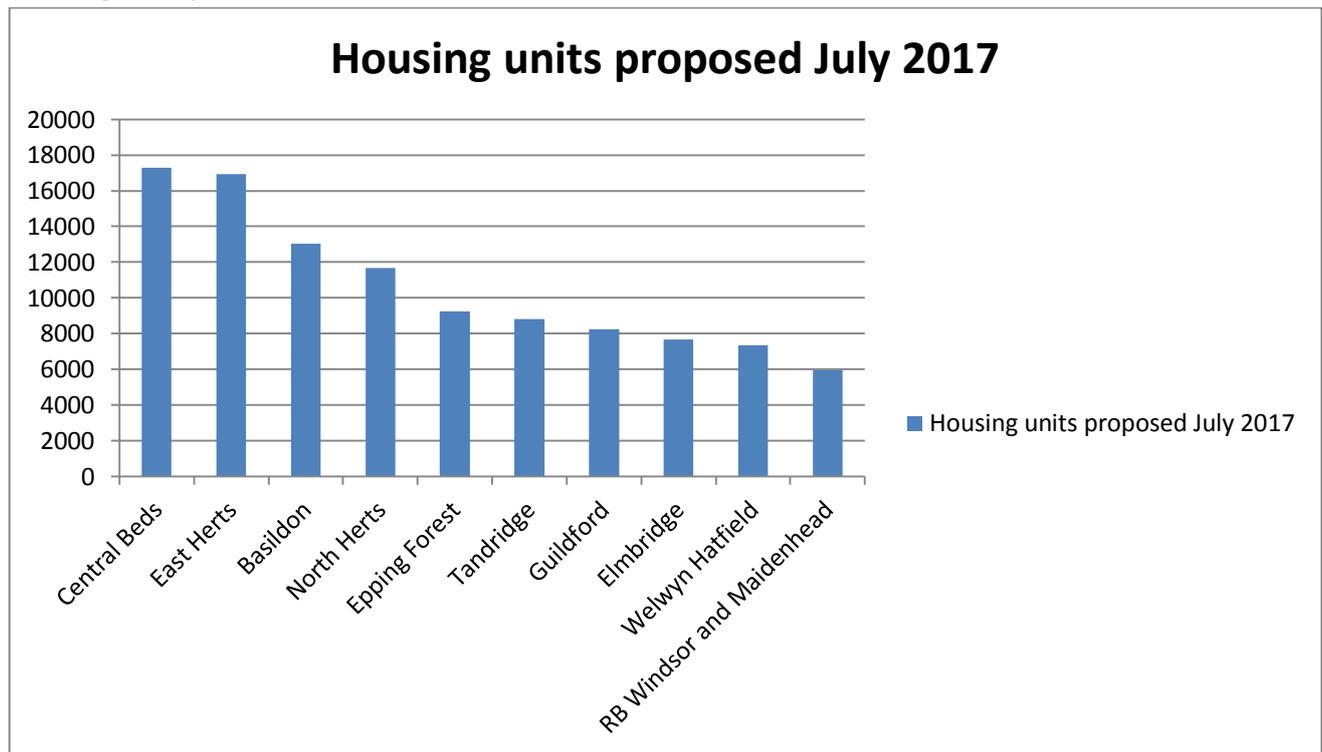
Figure 4. Increase in the total number of houses proposed in the London Green Belt 2016-2017 by county



The increase in threats is much larger in some LPAs than others

The percentage increase in the numbers of sites and housing units threatening the LMGB in some LPAs is unquestionably large. Six LPAs have experienced increases of between 145% and 1597%: Runnymede, Woking, Royal Borough of Windsor and Maidenhead, Elmbridge and Castle Point. Just 10 of the 56 LPAs surveyed share nearly two thirds (64%) of the housing units being proposed on sites in the LMGB. These are shown below.

Figure 5. The ten LPAs with most threats from housing to the Green Belt (by number of housing units)



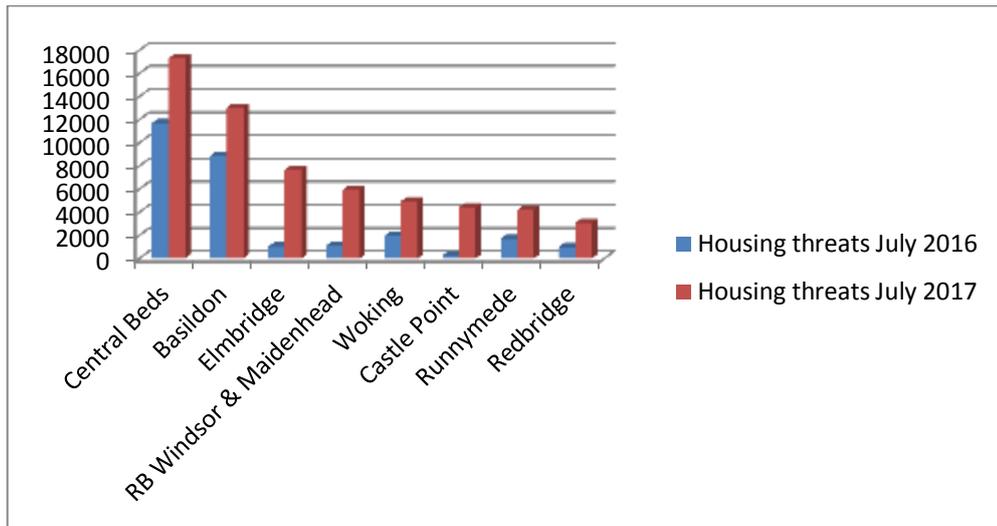
2.3 The link between Local Plan progress and threats to the Green Belt

The more advanced Local Plans are, the greater the threat to the Green Belt

As part of this year’s research we analysed the link between Local Plan progress and the number of Green Belt threats. This sheds some light on why the Green Belt appears to be under greater pressure in some LPAs than others. A list of the key stages of Local Plan development is shown in **Appendix 2**.

The data shows a clear correlation between Local Plan progress and increase in threats to the Green Belt. Many LPAs are further on in their Local Plan preparation this year and, as a result, more threats have come to light. In the eight LPAs with the biggest increases in threats to the Green Belt, ALL had undergone rapid Local Plan progress. Redbridge was the furthest advanced of London Boroughs surveyed. Also, the closer LPAs get to submitting their Local Plans for inspection, the greater the increase in the scale of housing threat to Green Belt and the number of sites involved.

Figure 6. The eight LPAs with the biggest increase in numbers of houses proposed on the Green Belt



This picture is reinforced when we look at the 11 Green Belt LPAs with the most significant Local Plan making progress since 2016. Seven out of the eight LPAs shown in Figure 6 above are among the LPAs which had made the most significant progress in the production of a Local Plan between July 2016 and July 2017. A list of these LPAs and their Local Plan progress can be found in **Appendix 3**.

Figures 7 and 8 below illustrate this. The earlier report, ‘*Safe Under Us?*’ discussed how, pressure to meet housing targets was pushing LPAs to allocate Green Belt land for development in order to ensure their Local Plans were found to be sound by the Planning Inspectorate following the Plan’s Examination in Public. The search for development land continues throughout the Local Plan making process and often leads to an increase in the number of houses proposed on Green Belt sites between successive versions of the Local Plan. This is illustrated by looking at some of the LPAs with the largest increase in the scale of development threat.

Figure 7. Increase since 2016 in number of houses proposed in the 11 London Green Belt LPAs with most significant Local Plan making progress

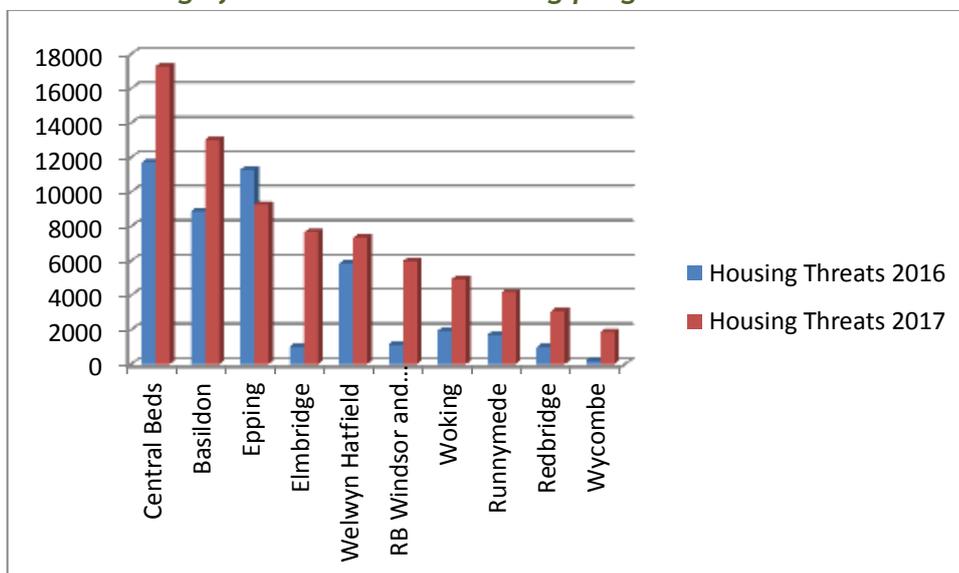
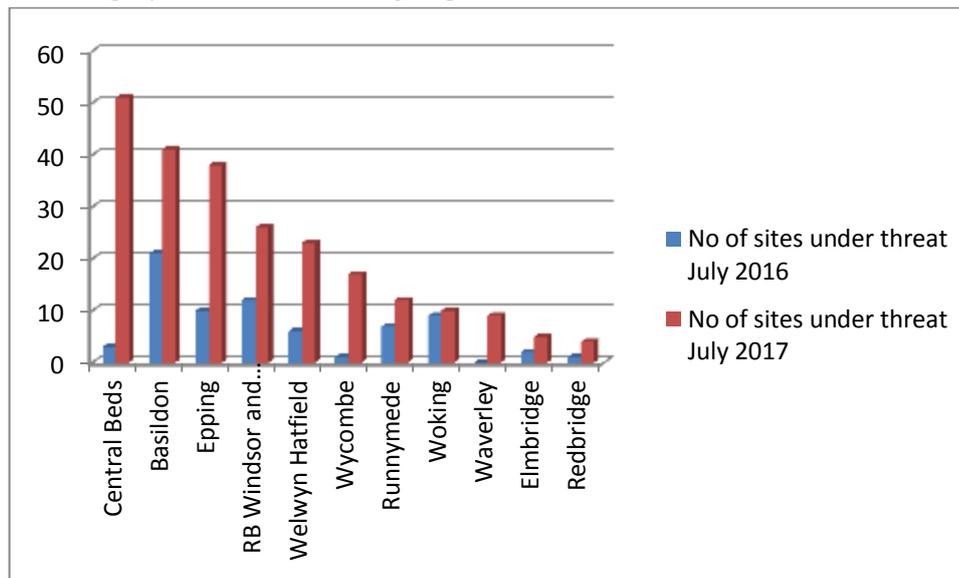


Figure 8. Increase since 2016 in sites under threat in the 11 London Green Belt LPAs with most significant Local Plan progress



In Surrey, where many LPAs have made significant progress with their Local Plans since data was collected last year (four of which appear in Figure 7 and 8), there is a 73% increase in the number of houses proposed on Green Belt land. This pressure on LPAs to find Green Belt land for housing in the Local Plan process is further illustrated through the case studies below.

2.4 Case studies: LPAs which have made significant Local Plan progress since 2016

CASE STUDY 1

Central Bedfordshire Council - the pressure caused when a Local Plan is withdrawn

Central Bedfordshire Council's Local Plan was withdrawn in February 2015 [after criticism from the Planning Inspector for failing under the Duty to Co-operate](#) to sufficiently meet Luton's, its urban neighbour, 17,800 objectively assessed housing need (OAN). The Central Bedfordshire Draft Local Plan, produced for consultation at the beginning of July 2017, has plans for 9600 houses on Green Belt land and it is noticeable that its housing target is higher than its OAN (108%) while Luton's target is just 38% of its OAN. The Local Plan also contains proposals for a large 20ha strategic employment area next to junction 11a of the M1 which itself was a large infrastructure project on Green Belt Land granted under 'very special circumstances'. This is an example of the danger of a ripple effect of Green Belt land release adding further pressure for development. The threats in the Central Bedfordshire are not 'limited' to large developments, there are at least 51 sites which have been shortlisted as strategic residential or employment sites as part of the Local Plan preparation.

CASE STUDY 2

Basildon Borough and Epping Forest District Councils - the search for more sites between Regulation 18 Public Consultation (Regulation 18) and Local Plan publication (Regulation 19)

As it prepares for publishing the version of the Local Plan which will be submitted to the Planning Inspectorate (Regulation 19), Basildon Borough has carried out a [New and Alternative Sites consultation](#), adding a further potential 4,200 houses on 18 newly identified Green Belt sites. This

follows the [Thames Gateway SHMA](#) which increased the 20 year housing targets for Basildon from about 15,000 to 20,000.

Although it appears there has been a slight reduction in the number of houses proposed on Epping Forest District Council's (EFDC) Green Belt, the number of such sites allocated for development has actually risen between July 2016 and July 2017. This has increased even more since our data collection exercise with the publication of [Epping Forest District Council Local Plan - Sites for consideration following Regulation 18 consultation](#). A further 110 sites have been put forward as potential sites for development, the majority of which are on Green Belt land, following an 11% increase in its OAN from a [recent Housing Market Area update](#). The pressure on EFDC is further heightened by the precedent set by Planning Inspectors in rejecting Local Plans for their failure under the Duty to Co-operate. Consequently, [EFDC's Local Plan](#) includes a commitment to providing 3,900 homes to meet Harlow's unmet housing need (while East Hertfordshire District Council intends to cater for 3,050 of this unmet need).

CASE STUDY 3

Royal Borough of Windsor and Maidenhead - a fivefold increase in the number of houses proposed in the published Local Plan (Regulation 19)

The Royal Borough of Windsor and Maidenhead's published Plan contains proposals for 5,958 houses on Green Belt land compared to the 1,138 discussed by the Local Plan Preparation Working Group and included in our data last year. This reflects the decision to increase the housing target from 65% to 100% of the OAN.

CASE STUDY 4

Woking Borough Council - more threats following Local Plan Adoption

Nine Green Belt sites were included in Woking's Local Plan which was one of the first Local Plans to be adopted after the introduction of the NPPF in 2012 (*'Safe Under Us'* provides more detail about the NPPF). Some of the sites are for development in the Plan period up to 2027 while others are 'safeguarded' sites for use after the Plan ends, to establish a "permanent Green Belt boundary" as required by the NPPF.

The Council consulted on a new site for up to 3,000 dwellings in 2017, ostensibly as an alternative to the nine sites previously proposed in the Local Plan. However, CPRE Surrey Planning Advisers are concerned that the original sites remain at risk due to the Council attempting to continue with a Site Allocations Plan that only has a housing target of 292 per annum taken from the 2012 Core Strategy. This is just half of the Borough's current objectively assessed housing need (OAN).

2.5 Threats to the Green Belt within Greater London where Local Plan progress has generally been slower

London Boroughs are generally making slower Local Plan progress as they await the publication of the new London Plan. However, our data collection identified 3749 houses to be built on Green Belt land in Greater London and 33 sites at risk from development. Many of these threats were identified in CPRE London's recent report, *'The Strongest Protection? One year on'*. In addition to threats from housing, the report claims that the Government's Education Funding Agency (EFA)

has been acquiring protected sites in London on which to build 'free schools', bypassing the local planning and consultation processes.

Threats to London's Green Belt include proposals in the following London Boroughs:

- **Redbridge**-Local Plan proposes 4 large Green Belt sites for 3074 housing units (awaiting report of the Examination in Public);
- **Croydon** - Local Plan proposes seven of the large Green Belt sites for schools and housing (awaiting report of the Examination in Public);
- **Bromley** - Submission Local Plan proposes 8 small Green Belt sites for release, mainly to provide for new and expanding schools. CPRE London argues that Bromley has largely failed to look for alternatives and that the need for school places cannot be regarded as an 'exceptional circumstance' - applying as it does across most of London;
- **Hillingdon** - 8 sites marked as land potentially required during the construction of HS2.

3. Emerging threats

Threats are likely to rise again: the estimated threats will increase to 300,000 new houses in the coming year

This year's data shows that the "Safe Under Us" report was correct in 2016 to predict that there would be a further increase in threats. While DCLG spokespeople referred to our report as containing 'speculative and misleading' data, it was clear that, if anything, the data under-reported the scale of Green Belt threats because due to the fact that many plans had not yet progressed and could therefore be included.

The data also indicates that it is very likely that threats will increase in future. It is estimated that, without action being taken both at central and local government level, threats will increase to over 300,000 houses by July 2018.

The following sections give details of the threats predicted to emerge as a result of withdrawn plans, more progress with Local Plans and major infrastructure projects.

3.1 Increased threats in Local Plans withdrawn due to failure under the 'Duty to co-operate'

The implications for the Green Belt of Local Plans being withdrawn because of a failure under 'Duty to co-operate' has already been highlighted by the focus on Central Bedfordshire's Local Plan. Two London Green Belt LPAs were forced to withdraw their Local Plans since the publication of 'Safe under us' - Castle Point and St Albans.

Castle Point

Castle Point's Councillors refused to endorse its planning officers' proposals for over 4000 houses on its Green Belt in its 2016 Draft Local Plan, reducing the figure to 261. The plan was subsequently withdrawn following the [Inspectors letter after the Duty to Co-operate Hearing](#), where the Planning Inspector stated: "*The Council fell well short of making every effort to secure the necessary cooperation on the strategic cross-boundary matter of housing before submitting the New Local Plan for examination. The engagement undertaken as part of its preparation was fundamentally flawed.*"

It is now considered likely that the Green Belt is at risk from the 4428 houses originally proposed on 11 sites in Castle Point's Local Plan

St Albans City & District Council

St Albans City and District Council has recently failed in [its attempt to overrule the Planning Inspector's rejection of its Local Plan](#), which proposed 4000 homes on its Green Belt, due to its failure under Duty to Co-operate.

3.2 Emerging Local Plans and large infrastructure projects

Kent

There is a deceptively small number of reported threats from LPAs in Kent. This may well reflect slow progress with Local Plans rather than authorities working harder to defend protected land. LPAs in Kent such as Sevenoaks and Tunbridge Wells, which are constrained by both Green Belt and Areas of Outstanding Natural Beauty (AONB), are still in the early stages of Local Plan preparation. We know, however, that the Green Belt in these areas is under great pressure, as indicated by the objectively assessed housing need figures below.

| Local Planning Authority | Objectively Assessed Housing Need | Constraint |
|--------------------------|-----------------------------------|-----------------------------|
| Sevenoaks | 12,600 | 93 % Green Belt; |
| Tunbridge Wells | 13,900 | 22% Green Belt and 70% AONB |

Both these LPAs have put forward their ‘Issues and Options’ documents to residents for consultation since our data collection exercise. These documents make it clear that Green Belt land will have to be allocated for development although it is not yet known to what scale.

CASE STUDY 5

Tunbridge Wells - hidden threats in plans at an early stage?

CPRE Kent has provided the following information about the large-scale emerging threats to its Green Belt.

The Green Belt is now greatly under threat in Tunbridge Wells Borough (TWBC). The Borough Council has commissioned a study of the Green Belt in order to assess to what extent the sites meet the purposes of the Green Belt, but this has not yet been published.

TWBC’s recently closed consultation on Issues and Options for its new Local Plan included 5 five options for fulfilling the OAN. Four of the options would certainly affect the Green Belt. The fifth option - a new “garden village” settlement may or may not be situated in the Green Belt, but could only be undertaken in combination with one of the other options because of the length of time it would take to implement it. Moreover, in the first Call for Sites for the new Local Plan more than 60 sites, together amounting to more than 586 hectares, were put forward which according to the SHLAA are designated as Green Belt.

As this Call for Sites did not produce enough sites to meet the OAN, there was a second Call for Sites, which has now closed, and a map showing the additional sites put forward has been published. However, there is no information yet on the area of those sites. It is clear from the map that the additional sites put forward include a very substantial acreage within the Green Belt.

South East Essex

LPAs in South East Essex which are still at a very early stage of producing their plans, are under enormous pressure with at least another 20,000 homes ‘needed’ according to Thames Gateway

SHMA. As local campaigner and London Green Belt Council member, Dr Phil Gibbs, points out: *“Thurrock have mentioned figures of 30,000 homes for their emerging Local Plan, but there is nothing formal yet and it is hard to say how many will have to go on Green Belt land. The fate of the inevitable unmet need from Southend is also not known. These questions are being discussed by the councils involved.”*

Epping Forest District Council

Case Study 2 details how over 100 new sites are currently being assessed by Epping Forest District Council for inclusion in their Local Plan

South Buckinghamshire and Chiltern District Councils

South Buckinghamshire and Chiltern District Councils are the only LPAs where there has been a significant decrease in threats from housing (they are preparing a joint Local Plan). This might be explained by the fact that data came from a very early evidence base - the [Buckinghamshire Green Belt Study and Strategic Housing Market Assessment in early 2016](#). There has since been agreement to share housing provision with neighbouring Councils, Aylesbury Vale and Wycombe, where there are now 2688 houses proposed in the Green Belt (compared to 212 in 2016). Moreover, the two LPAs are under pressure from their urban neighbour, Slough, to provide for its ‘unmet need’.

Early in 2017, a South Buckinghamshire District Council statement was issued objecting to Slough’s proposals to develop thousands of homes on Green Belt land within South Buckinghamshire District, including a northern expansion of Slough with many of the sites identified in *“Safe under Us?”*.

Large infrastructure projects: Cross Rail 2 and the Lower Thames Crossing

Cross Rail 2 - The analysis has not included the 20,000 houses which are part of the business case for Cross Rail 2 and identified in *‘Green Belt under siege: 2017’*.

Lower Thames Crossing - It is likely that further threats from both infrastructure and housing developments will emerge in Essex and Kent now that the route of the Lower Thames Crossing has been published.

3.3 The quality and significance of Green Belt land coming under threat is also a major issue

The significance of a threat cannot always be captured in numbers. Even on the rare occasion when LPAs appear to have reduced the number of sites to be released from the Green Belt in their Local Plan, the sites which remain at risk can be of huge strategic value and their loss has the potential to undermine the integrity of the entire London Green Belt. This is exemplified by the case study below.

CASE STUDY 6

Blackwell Farm, Guildford Borough Council - unexceptional circumstances used to justify Green Belt release

Guildford Borough Council recently consulted on a revised version of its [Submission Local Plan](#), following advice from the Planning Inspector having received an unprecedented 32,000 comments during its original consultation in July 2016. It stated that it had reduced the threat to the Green Belt by reducing the number of developments, however campaigners such as Save Hogs Back and the Guildford Green Belt Group point to the quality and significance of the Green Belt land put forward for development and how losing such sites sets an alarming precedent for building on high quality land which performs a significant Green Belt purpose.

The inclusion of the University of Surrey owned site, Blackwell Farm, in the Local Plan with proposals for 1800 dwellings and a 10/11ha extension to the Surrey Research Park highlights how unexceptional circumstances are being used to justify development of strategically important Green Belt land. The land at Blackwell Farm contains high quality agricultural land and has been independently assessed as meeting AONB criteria. There are many challenges to the University's [assertion in the previous Local Plan Consultation](#) that the site "*distinguishes itself through powerful exceptional circumstance*". Campaigners, including CPRE Surrey, have shown that:

- Blackwell Farm prevents urban sprawl to the West of Guildford and protects the countryside (including AONB) from incursion;
- Development on the site effectively removes Guildford's "green lung" on the slopes of the Hogs Back. The open farmland to the west of Guildford allows clean air to be blown into the town. If this area is urbanised, CO2 emissions and other pollutants will replace this clean air;
- More effective use of the current Surrey Research Park would remove the need for new land. The existing Research Park is low density with just 65,000m² of office space over 27 ha. This land could be used far more effectively, for example by providing office space and other mixed-use development on surface car parks
- There is far greater potential than indicated in the Local Plan to meet Guildford's need for affordable housing on brownfield sites. Guildford town has developed very little over the last 20 years and has not undergone the type of normal urban expansion, redevelopment of previously developed sites and increase in residential densities such as nearby towns like Woking.

4. Why is London's Green Belt under threat?

'Safe under us?' looked at the factors which were creating the pressure for LPAs to release Green Belt land for development, namely:

- Unrealistically high aspirational economic growth targets which lead to inflated housing targets
- Methodology for calculating housing need
- Land banking by developers
- Pressure on LPAs to produce a Local Plan which avoids sanctions from Central Government
- Green Belt reviews being used as a tool to search for development land, rather than genuinely assessing how well it fulfils its Green Belt function
- 'Duty to co-operate' rules meaning LPAs not being able to cite Green Belt as a constraint to meeting housing need

4.1 Local campaigners' commentary on the impact of inflated housing targets and the 'Duty to Co-operate'

The concerns that the impact of inflated housing targets and the 'Duty to Co-operate' are borne out by the rapid increase in the number of threats to the LMGB over the past year.

This report shows how Planning Inspectors are still rejecting Local Plans which cite Green Belt as a constraint either under the NPPF or under the duty to co-operate. They are also failing Local Plans which include housing targets below objectively assessed housing needs. This places LPAs who share Green Belt constraints with adjoining authorities in an impossible situation, as well as pressurising them to meet the housing need of their urban neighbours.

Alasdair Daw, Billericay Action Group (Basildon Borough Council).

Recently the consultants used to produce the OAN have decided that the economic outlook for the area is even more rosy than it was last year and that as a consequence still more outside workers must be brought into the area. Our OAN has grown from 15,000 to 20,000. The greatest driver is to support potential jobs growth through accelerated migration into the area and figures almost entirely disregard groups such as the local unemployed, part-time workers and out-commuters who would rather work closer to home.

Planning Officers are indicating we must meet OAN and are giving a very strong steer in that direction. They also advised Borough councillors against the commissioning of research into how the borough might use Green Belt as the basis for a sub-OAN housing Target on the grounds that the Plan would not then be "Positively Prepared".

Kevin Fitzgerald, CPRE Hertfordshire Honorary Director

CPRE Hertfordshire believes that East Hertfordshire District Council's calculation of its contribution to the Housing needs of a wide area of west Essex and eastern Hertfordshire is misguided, and threatens the unnecessary permanent loss of Green Belt in the District. The Council's calculation is compounded by its decision to set a Housing Target in its District (Local)

Plan that meets this Objectively Assessed (housing) Need (OAN) in full, despite the conflict with national Planning Policy that this causes. We are contesting this at the District Plan Examination Hearings that start on 3 October.

Adding salt to the wound is the Council's proposal for 10,000 houses in an expansion of Harlow northward across the Stort Valley into the Green Belt in the parishes of Eastwick, High Wych, Hunsdon, and Gilston, of which 7,000 would be built after the District Plan end date.

John Warren, Theydon Bois Action Group Chair (Epping Forest District Council)

There is pressure to increase the OAN from 11,400 to around 13,278. It has been claimed that more recent Sub-national Household Projections should be taken into account, along with the 2015 mid year estimates or else the draft Local Plan will be found unsound. EFDC are now assessing some 160 new or amended sites, many of which are in the Green Belt and which have been put forward since the earlier Call for Sites cut off for the Draft Local Plan. However, there is no further public consultation period on these sites prior to EFDC's Pre-submission Regulation 19 Plan.

The above figures, which are all about inward migration, largely from London, are in contrast with EFDC statement that this is 'Your Local Plan' and will provide houses for your children and grandchildren.

4.2 The [Housing White Paper](#)

The White Paper issued in February reiterated the Government's commitment to the Green Belt and the need for LPAs to explore brownfield and densification options for new housing before turning to Green Belt. Many organisations, however, including the London Green Belt Council and CPRE both nationally and locally, although welcoming the words of support for the Green Belt, do not believe that the White Paper goes far enough to stem the increasing tide of threats to protected land. The [LGBC's response to the White Paper consultation](#) stressed that:

- While we welcome the strengthening of the requirements to fully explore alternatives to developing on Green Belt land, they are worded in a way that could be used to justify the use of such land.
- Unless Green Belt is accepted as a constraint in meeting housing need, the Green Belt will continue to be under threat.
- There are considerable concerns about the impact that the five-year cycle of Local Plans will have on the Green Belt's permanency.
- There needs to be a long term strategic plan to allow forward looking strategies to be developed and carried out in order to create a more attractive and well-used Green Belt which delivers greater public benefit. We advocate an overall authority for the London Green Belt which could provide co-ordination and would have to be consulted and give approval for any development in the Green Belt.

APPENDICES

Appendix 1 Threats to the London Green Belt July 2017: Summary table

| County | District/Borough | Number of houses proposed on Green Belt land | Number of sites proposed on Green Belt land |
|------------------------|---|--|---|
| Bedfordshire | Central Beds | 17300 | 51 |
| | <i>Luton</i> | <i>Not surveyed</i> | <i>Not surveyed</i> |
| Berkshire | Bracknell Forest | 1452 | 9 |
| | Royal Borough of Windsor and Maidenhead | 5958 | 26 |
| | Slough | 159 | 22 |
| | Wokingham | 0 | 13 |
| Buckinghamshire | Aylesbury Vale | 819 | 3 |
| | Chilterns/South Bucks | 5810 | 16 |
| | Wycombe | 1869 | 17 |
| Essex | Basildon | 13035 | 41 |
| | Brentwood | 5170 | 9 |
| | Castle Point | 4428 | 11 |
| | Chelmsford | 575 | 0 |
| | Epping | 9255 | 38 |
| | <i>Harlow</i> | <i>Not surveyed</i> | <i>Not surveyed</i> |
| | Rochford | 1910 | 8 |
| | <i>Southend</i> | <i>Not surveyed</i> | <i>Not surveyed</i> |
| | Thurrock | 1285 | 5 |
| | Uttlesford | 16 | 1 |
| | Hertfordshire | Broxbourne | 2738 |
| Dacorum | | 900 | 1 |
| East Herts | | 16950 | 11 |
| Hertsmere | | | 1 |
| North Herts | | 11680 | 8 |
| St Albans | | 4000 | 4 |
| Stevenage | | 1350 | 2 |
| Welwyn Hatfield | | 7356 | 23 |
| <i>Three Rivers</i> | | <i>Not surveyed</i> | <i>Not surveyed</i> |
| <i>Watford</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |

| County | District/Borough | Number of houses proposed on Green Belt land | Number of sites proposed on Green Belt land | |
|---------------------------------|-----------------------------|--|---|---|
| Kent | Gravesham | None recorded | 1 | |
| | Sevenoaks | 450 | 1 | |
| | Tonbridge and Maling | 3500 | 2 | |
| | Tunbridge Wells | None recorded | 3 | |
| | <i>Dartford</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | <i>Maidstone</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | <i>Medway</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| London | Barking and Dagenham | 0 | 2 | |
| | Barnet | 0 | 1 | |
| | Bromley | 0 | 8 | |
| | Croydon | 675 | 7 | |
| | Enfield | 0 | 0 | |
| | Havering | 0 | 1 | |
| | Hillingdon | 0 | 8 | |
| | Hounslow | 0 | 1 | |
| | Redbridge | 3074 | 4 | |
| | Sutton | None recorded | 1 | |
| | <i>Bexley</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | <i>Ealing</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | <i>Haringey</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | <i>Harrow</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | <i>Kingston upon Thames</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | <i>Newham</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | <i>Richmond</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | <i>Waltham Forest</i> | <i>Not surveyed</i> | <i>Not surveyed</i> | |
| | Surrey | Elmbridge | 7654 | 5 |
| | | Epsom and Ewell | 1000 | 9 |
| Guildford | | 8226 | 11 | |
| Mole Valley | | None recorded | None recorded | |
| Reigate and Banstead | | 1220 | 2 | |
| Runnymede | | 4170 | 12 | |
| Spelthorne | | 3000 | 1 | |
| Surrey Heath | | 1500 | 1 | |
| Tandridge | | 8793 | 20 | |
| Waverley | | 1243 | 9 | |
| Woking | 4954 | 10 | | |
| ALL PLANNING AUTHORITIES | | 163,474 | 443 | |

Appendix 2 The key stages of Local Plan development

The key stages of Local Plan production are set out in the Town and Country Planning (Local Planning-England) Regulations 2012

- **Preparation ([Regulation 18](#))**: Main consultation opportunity on the draft Local Plan, following which further amendments and adjustments may be made to take account of feedback received. It is important to publish key evidence studies and undertake constructive engagement during this stage and prior to this consultation in order to comply with the Duty to Co-operate.
- **Publication ([Regulation 19](#))**: Final opportunity for comment on the Local Plan prior to submission of the Local Plan for examination. No further changes may be made to this document after this stage. It is not a full public consultation and will not be accompanied by the full range of publicity and participation opportunities undertaken as part of the Regulation 18 consultation, but the ‘general’ and ‘specific’ consultation bodies must be notified of the availability of the documents. The Council must collect all responses and compile a Statement of Representations to submit to the Planning Inspectorate.
- **Submission ([Regulation 22](#))**: Dispatch of the required documents to the Planning Inspectorate for Examination. The Government has indicated that it wants all Local Planning Authorities to submit their Local Plans by ‘early 2017’.
- **Consideration of representations by the appointed person ([Regulation 23](#))** Before examining the Local Plan the Inspector must consider the comments (‘representations’) made on the plan by interested parties.
- **Examination in Public ([Regulation 24](#))**: Planning Inspector will consider the documents submitted and issue a report which states whether he or she considers the Local Plan to be ‘sound’. The inspector can recommend ‘main modifications’ to the submitted plan.
- **Receipt of the Inspector’s Report ([Regulation 25](#))**: If the Inspector recommends that the plan is ‘sound’, then the Council may proceed to adopt the plan as policy. Exceptionally, if the plan is not found sound, then the Council may withdraw it under Regulation 27.
- **Adoption ([Regulation 26](#))**: following receipt of the Inspector’s final report, the Council may adopt the Local Plan as a material consideration in the consideration of planning applications under Section 23 of the Planning and Compulsory Purchase Act 2004.

Appendix 3 Green Belt LPAs with the greatest Local Plan progress since 2016

Green Belt LPAs with the greatest Local Plan progress since 2016

| District | Local Plan Status July 2016 | Local Plan Status July 2017 |
|---|-----------------------------|---|
| Woking | Adopted | Under revision |
| Waverley | Emerging | Examination in Public (Reg 24) |
| Redbridge | Draft | Examination in Public (Reg 24) |
| Welwyn Hatfield | Draft | Plan Submitted (Reg 22) |
| Royal Borough of Windsor and Maidenhead | Emerging | Pre-submission: (Reg 19 Consultation) |
| Basildon | Draft | Draft: New and Alternative Sites (NAS) Consultation |
| Central Beds | Withdrawn 2015 | Draft (Reg 18 Consultation) |
| Runnymede | Emerging | Draft (Reg 18 Consultation) |
| Wycombe | Emerging | Draft (Reg 18 Consultation) |
| Epping | Emerging | Draft (Reg 18 Consultation) |
| Elmbridge | Emerging | Draft (Reg 18 Consultation) |

Appendix 4 The correlation between local plan progress and threats in LPAs where there has been little Local Plan progress

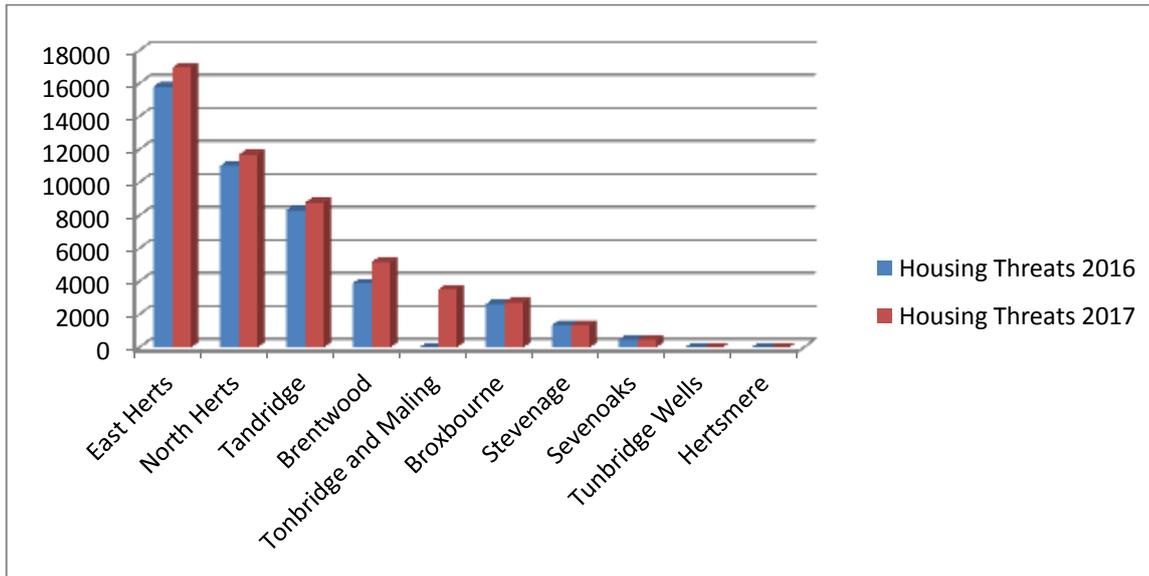
We also looked at the correlation between local plan progress and threats in LPAs where there has been little Local Plan progress.

The ten London Green Belt Home County LPAs with least Local Plan progress since 2016

| District/Borough | Local Plan Status 2016 | Local Plan Status 2017 |
|-----------------------|--------------------------------------|--------------------------------------|
| East Herts | Pre-Submission Publication (Reg 19) | Submitted (Reg 22) |
| Hertsmere | Pre-Submission Publication (Reg 19) | Submitted (Reg 22) |
| North Herts | Pre-Submission Publication (Reg 19) | Submitted (Reg 22) |
| Stevenage | Pre-Submission Publication (Reg 19) | Submitted (Reg 22) |
| Brentwood | Draft Local Plan Consultation Reg 18 | Draft Local Plan Consultation Reg 18 |
| Broxbourne | Draft Local Plan Consultation Reg 18 | Draft Local Plan Consultation Reg 18 |
| Tandridge | Emerging | Draft Local Plan Consultation Reg 18 |
| Sevenoaks | Emerging | Emerging |
| Tonbridge and Malling | Emerging | Emerging |
| Tunbridge Wells | Emerging | Emerging |

NB: London Boroughs were not included in this table due to the generally slower Local Plan progress across the city as they await the publication of the new London Plan.

Local Plan Activity - graph showing the difference between threats (no. of houses proposed) on Green Belt sites in the 10 Home County London Green Belt LPAs with the least Local Plan progress since July 2016 *



Explanatory notes:

*The figures for Brentwood and Tonbridge and Malling include a large number of houses proposed in Garden Villages/Cities outside the Local Plan process:

- **Brentwood** The number of houses proposed in the Local Plan at Dunton was 2500. Dunton has now been put forward outside the Local Plan process as a potential Garden Village, increasing the number of proposed homes to 3500;
- **Tonbridge and Malling** A large site at Borough Green has been put forward, following a speculative proposal based on the footprint of the previously proposed (and rejected) Borough Green International Freight Depot. Nearly all of the site is Metropolitan Green Belt and around 20% also designated as an Area of Outstanding Natural Beauty (AONB).

Acknowledgements:

Author and lead researcher: Catherine Maguire - London Green Belt Council

Additional research undertaken by:

- **Members of the London Green Belt Council**
- **CPRE Branches: Bedfordshire; Berkshire; Buckinghamshire; Essex; Hertfordshire; Kent; London and Surrey**
- **CPRE London Volunteers: Nina Shishkin-Smith and Gilka Rocha**
- **London Green Belt Council Volunteer: Dr Philip Gibbs**