

Yes to building compact communities: No to destruction of the Green Belt

London needs to be careful that in the rush to build homes we don't lose those precious bits of land that make this city so liveable.

CPRE London's response to London Councils' housing paper

London Councils has proposed [ten ideas](#) to tackle London's housing challenge. CPRE London welcomes many of these proposals. Actions like these will help to address problems of under supply of good quality and affordable housing. We also agree with London Councils that there is no single solution to address the challenge. A stronger, clearer vision and people-centred ethos is required however in order to ensure a successful and systematic approach to house building in the capital.

'Thinking big' may bring quick answers but where large projects rush and fail to properly involve local people they will fall short and fail to deliver long-term wellbeing benefits. CPRE London would encourage London Councils to look at some of the pioneering examples of what's being achieved and planned from the bottom-up in terms of housing and place-making. We should all look at how these have emerged and ask how similar, locally-run, developments can be further enabled across the capital.

Specific comments

1. Protecting the Green Belt and green spaces

We must recall the reason why the Green Belt and other green spaces such as 'metropolitan open spaces' are important and have been given legislative protection. The NPPF recognises the need for 'permanence' in the Green Belt because it is of **real value** and it is **finite**. Once green belt land is developed on it will not be recovered, we'll not get it back.

Between 2009 and 2012 building on open spaces in London has continued steadily. We've lost **216 hectares** of open space land to development, particularly from housing and mixed-use sites. The majority of the land that has been lost has been in Metropolitan Open Spaces and the Green Belt (['London's green spaces need us!'](#) CPRE London 2013). This is in spite of the London Plan's Policy 7.17 on Metropolitan Open Land which states: "*The strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances giving the same level of protection as in the Green Belt*".

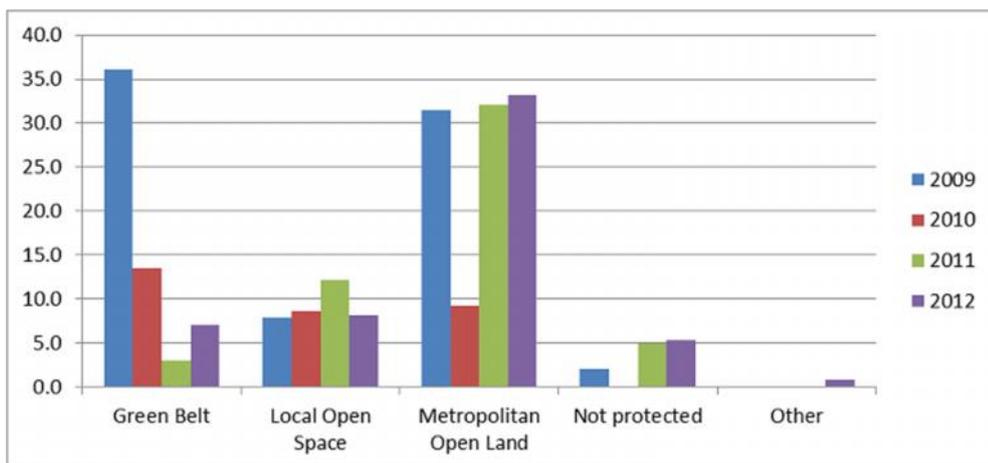
Once we relax restrictions on building on Green Belt and open land, developers will use precedents to demand more "special circumstances". Granting planning permission for development on green spaces should only be very rare, to meet unusual public interest, and only when all other routes have been exhausted. CPRE London suggests that the London Council's proposal for housing developments around "11 [unspecified] tube stations" in the Green Belt, needs to be removed or at a minimum be very carefully reviewed on a case by case basis. We would like to know which eleven sites London Councils is referring to? Do they plan to involve local residents who live in and around those sites before making a decision? *See also our comments below regarding 'Valuing the Green Belt'.*

2. Construction

We are broadly in agreement with regards to various suggestions for freeing up the *construction process*, including increasing contract times for builders and speeding up the planning system through adopting a full cost recovery of planning fees and establishing statutory timeframes for stakeholders to respond to

consultations – so long as these consultations are clearly communicated to the public and early on in the design process.

Total open space lost to development in London, 2009-12 (hectares)



Source: London Development Database

3. Finance

London Council's *financial* recommendations include freeing up housing association equity, currently defined as debt, and cutting the cap on London Council borrowing from Housing Revenue, which we also support. Furthermore, we recommend the use of **financial incentives**, such as S106 and Community Infrastructure Levy (CIL), to prioritise the redevelopment of brownfield sites and new measures, such as Tax Increment Financing, to cover the upfront costs of regenerating brownfield sites.

4. Housing market

A number of the *housing market* suggestions CPRE London also agrees with. For example, improving the market for smaller builders, including the need to bring greater flexibility for small builders to enter the market is vital. This might have the additional benefit of helping to increase opportunities for **neighbourhood-led** initiatives, including community land trusts and self-build. We also need to identify ways to address the over-priced private rental sector, as well as the impacts of overseas investors to the over inflated ownership and rental markets.

5. Accessing land

We welcome the need to address land banking and bringing public land back on stream. In addition to the proposal of a Land Value Tax London should also look into the supporting greater use of **Compulsory Purchase Orders**, as recommended by groups like RTPi, to reclaim land that have been given planning permission but no development is taking place. We recognise that many London Boroughs are trying to ensure much of the current housing developments on previously developed land i.e. brownfield sites and we argue that this must continue and be maintained.

Valuing the Green Belt

Housing in and of itself does not produce good quality of life – we need to ensure that it is good quality housing that is well integrated with existing neighbourhoods, and offers a good balance of infrastructure and critically access to green spaces. Green spaces – if properly managed and invested in provide considerable social, environmental and economic values which are not fully reflected in the housing and land markets (Living London, CPRE London 2013).

DEFRA released a report ([DEFRA 2013](#)) indicating the Green Belt and green infrastructure contributes directly **local economic growth**, in particular:

- Attracting business: Attracting both businesses and customers to an area due to improved views and air and water quality
- Attracting workforce: Attracting creative and innovative individuals who find high environmental quality and a sustainable urban environment appealing;
- Cutting flood risk: Reducing flooding risk for both businesses and residents;
- Reduced energy cost: Reducing fluctuating energy cost risk for businesses and investors;
- Health benefits: Reduced health treatment costs and improved work productivity due to associated physical and mental health benefits;
- Education: Improved education outcomes and interest in STEM subjects for students able to access learning in outdoor environments, leading to a higher skilled labour force;
- Ecosystem services: Making cities less costly to run through building up ecosystem assets, lowering costs due to reduced risks and improved air and water quality, and reducing urban heat island effects, and thereby allowing investment in other areas to stimulate economies and attracting further investment.

Their report does not mention the wildlife habitat and food production benefits such land can provide.

Promoting liveability

CPRE London is not opposed to development. We would like to see the right kinds of development, in the right places and in the right way – involving local actors. We recognise the urgent need for housing of low and middle-income groups but also we need to learn from the past and current examples where suburban sprawl has led to urban decline and unsustainable outcomes. The ghetto conditions in some of the Paris Bandlieue and the decline of cities like Detroit, USA, highlights the dangers of indiscriminate outward expansion. Cities that steadily sprawl outwards can die at their centres. A compact community model for housing developments relies on what CPRE calls the '[proximity principle](#)'. When we put people at the centre of urban developments, and focus on an urban village or high street hub, with good access to amenities (schools, health care, parks etc) we find greater efficiencies of provision, sense of community and wellbeing.

Our [Campaign for a Liveable London](#) is examining compact developments from across London: from Master plan developer-led projects; local government-led infill; through to community led initiatives. We will be unpacking what makes them work and what challenges they face, as well as how community groups can be put at the centre of the process. We will share good practice lessons with London Councils and the Greater London Authority as soon as our findings are available in early 2014 and look forward to future discussions with you on addressing this challenging agenda.

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