



London
Campaign to Protect Rural England

SPACE TO BUILD: why we don't need to build on our green spaces to solve the housing crisis



A report by CPRE London, June 2017

SPACE TO BUILD: *nine reasons* we don't need to build on our green spaces to solve the housing crisis

It is commonly argued that “to solve the housing crisis we must build on the Green Belt and other green spaces” but evidence shows there are alternative sites available in London for a million new homes, and more.

"Action is now needed to make more use of London's wasted spaces and suitable brownfield land.."

Intensification, reclamation and regeneration of appropriate spaces that are currently wasted provide enormous potential for new housing.

These wasted spaces are enough for the next 40 years if we continue to build at the current rate of 25,000 new homes per year. Delivering the new homes London needs has been hampered by slow build rates and lack of funding for affordable homes. The lack of suitable brownfield land is not, as often suggested, a major problem for the following nine reasons:

- 1. Sites for 560,000 homes have already been identified by planners**
- 2. Airspace – above existing buildings – could provide at least 500,000 homes**
- 3. Small sites can deliver more than 100,000 homes**
- 4. Estate regeneration could deliver up to 360,000 homes**
- 5. Car parks can provide space for 75,000 homes**
- 6. Disused garages can provide space for 16,000 homes**
- 7. Reclaiming roads and roundabouts could provide space for 10,000 homes**
- 8. Increasing housing densities in Outer London could deliver 20,000 homes each year**
- 9. Bringing empty homes back into use can deliver 5,000 homes**

And on top of all this, the supply of brownfield sites is not limited: as the use of urban land and buildings changes, more of it comes on stream every year.

Action is now needed

Government, local authorities, developers, housebuilders and community groups need to take action now to realise the potential of London's wasted spaces and brownfield land. This will make the city a more attractive and vibrant place and take pressure off the Green Belt and other vital green spaces.

What is stopping us?

Developers often argue that such sites are not yet 'deliverable' but many are available now.

With targeted funding, for example to overcome technical challenges of small sites, many more wasted or suitable brownfield sites could deliver new housing in the near future.

The financial rewards for gaining planning permission for greenfield development are considerable.

Housing developed on or next to protected Green Belt, Open Land or parks is particularly valuable because of its location: it is in the interest of developers and landowners to see such sites released for development because they can generate higher profits. This gives them an incentive to argue for relaxation of Green Belt and green spaces protection.

National Government policy compels local councils to allocate sites for new housing to meet targets regardless of how unrealistic they are.

So although the recent build rate in London is 25,000 homes per year, councils are required to find sites for 50,000 homes per year - double the number of sites that are likely to be realistically needed. As a result, many councils say they have no option but to allocate protected land in line with national policy, even though this does little to increase build rates and simply gives developers a wider choice of sites.

"... although the recent build rate in London is 25,000 homes per year, councils are required to find sites for 50,000 homes per year, double the number of sites that are likely to be realistically needed..."

What needs to happen?

The current Mayor's strong commitment to protecting Green Belt and Metropolitan Open Land is a welcome first step. Evidence shows that when developers and landowners receive the wrong signals from political leaders – and think protections might be loosened – speculation and opportunism rise, increasing pressure on protected land. ***The London Mayor, and his successors, must continue to send a clear message that they will not allow unnecessary and inappropriate development of London's vital Green Belt and green spaces.*** These messages must be backed up by action: the Mayor should make more use of his powers to refuse applications for unnecessary and inappropriate development.

The Government's national planning and housing policies are pushing councils to say they have no choice but to allocate protected land for housing when preparing their local plans. Councils are forced to identify many more sites than are needed and this simply gives developers a wider range of sites to choose from: build rates do not

change, and brownfield sites are left idle while greenfield sites are developed. This is the worst of all worlds. ***The supply of building sites must be based on realistic targets and councils should not be required to allocate sites for double the number of homes likely to be built.***

Local councils need to prioritise the reuse of wasted space in their areas for new housing and associated green infrastructure. This should be based on a thorough survey of existing and new brownfield sites suitable for new development, including all the potential sources outlined in this leaflet. ***And there should be a clear requirement that all suitable brownfield sites are built out before any protected green site is considered for development.***

Finally, to tackle London's housing crisis effectively we need much more affordable housing, not simply more housing. Just adding to the stock of market housing will not bring house prices or rents down to any significant degree. There is a clear need to refocus housing policy on delivering genuinely affordable homes for rent as well as shared ownership.

It is not inevitable that we have to build on Green Belt or other protected land. Let's build the new homes we need while leaving our valuable green spaces for future generations.

We can use the many opportunities identified in this pamphlet to ensure we build more houses, particularly affordable homes. Or we can – unnecessarily – lose our precious, protected land once and for all.

CPRE London campaigns to save Green Belt, Metropolitan Open Land and other green spaces within Greater London, and to make our capital city a better place to live for everyone. We are a membership body – please join today by contacting us at:

CPRE London, 70 Cowcross Street London EC1M 6EJ
www.cprelondon.org.uk office@cprelondon.org.uk
 Tel: 020 7253 0300
 CPRE London is a registered charity. Number 802622



*Written and researched by
 Alice Roberts and Amy Simon,*

1. Sites for 560,000 homes have already been identified



According to the Greater London Authority (GLA) 260,000 new dwellings already have planning permission[1]. It has also been estimated that 300,000 new dwellings can be built in the Mayor's Opportunity and Intensification Areas and Housing Zones[2]. On top of this, London's network of more than 1,200 town centres has considerable potential for new homes, particularly for smaller households and older people[3].

It is notable, for example, that Transport for London owns around 5,700 acres of property in London largely situated at or nearby transport nodes which make them hugely attractive from a developer's point of view and particularly suitable for high density housing[4].

IMAGE Old Oak Common, one of 38 Opportunity Areas in Greater London, 'could be a new urban quarter accommodating a minimum of 24,000 new homes' according to planning guidance

2. Airspace - above existing buildings - could provide at least 500,000 homes ...

High density is not a new concept: Victorian and Georgian mid-rise mansion blocks are a common sight in London



London's airspace - the space above existing buildings - is far less densely developed than that of New York [5] , Paris, Madrid or Berlin; half of all London homes are in one or two-storey buildings.[6] Developers are increasingly building into London's airspace, even re-developing relatively new buildings. Many reports talk about the potential of airspace and, while estimates for the numbers of new homes which can be delivered vary, it doesn't need to be high rise development.[7]

... through mid-rise, higher density schemes

While it is increasingly common to see high rise blocks of 10 to 30 stories in major developments in London, housing densities can be increased with mid-rise blocks of 5-10 stories. Compared with high rise buildings, which are often controversial due to their impact on protected views and neighbours' light, mid-rise blocks designed to complement local surroundings and built to high quality, such as at East Village in Stratford on the newly regenerated Olympic Park, can be more acceptable to local residents.

Such higher density housing development makes efficient use of space, infrastructure and existing transport links, while allowing for communal open space for recreation and wildlife.



IMAGE High density development at East Village in Stratford, part of the regeneration of the ex-industrial 2012 Olympics site

... building above commercial space



Redevelopment of commercial space to incorporate more floors above allows for retention of business use while increasing residential space. The redevelopment of the Topps Tiles site (pictured) on Stamford Hill and the builders yard on Crossway, both in Hackney, are recent examples.

BEFORE AND AFTER Topps Tiles on Stamford Hill, where the recent rebuild has created housing in airspace while retaining commercial space below

... and redeveloping supermarkets



A Morrisons store in Camden which is in line for redevelopment and the redevelopment of a 1980s Sainsbury's store in Nine Elms

Supermarkets in London are often single storey with a large car park attached. In recent years Sainsbury's has built flats above and around several of its stores. In collaboration with Barratt Homes and L&Q, the Sainsbury's Nine Elms store has been redeveloped to deliver 737 new homes.[8] Other supermarket chains have similar plans, with Tesco in talks to sell housing developers the "air rights" above 28 of its stores.[9] Morrisons has teamed up with Barratt Homes to plan the redevelopment of its Camden store, to deliver at least 700 new homes as well as shops, offices and public squares.[10]

3. Small sites can deliver more than 100,000 homes

The current London Plan indicates that 106,476 homes can be delivered through small sites (sites of less than 0.25ha).[11] Could this number be much increased in the new London Plan? A leading Councillor in one Inner London borough believes it would have been helpful to have included many more small sites in their Local Plan, in particular very small sites, because of their significant cumulative potential. Also, their experience showed it was possible to deliver higher densities than expected on many small sites increasing their contribution to meeting housing needs.[12]



BEFORE AND AFTER This site of just over 0.25 hectares has accommodated a relatively large development which does not overwhelm surrounding buildings

... small sites continued



In outer London, Croydon Council has identified small sites for up to 1,000 homes by 2019 on public land alone. In collaboration with independent development company Brick By Brick Ltd., the Council reviewed all of its public land and identified a series of small, underused sites suitable for housing development.[13] Such sites range from empty garages and car parks to disused washing line yards and spare land in between houses, including a neglected community centre in need of

regeneration. The centre is being redeveloped with new homes built in the airspace above.[14] Such small scale housing sites can provide scope for innovative, smaller developers and housebuilders to provide high quality, distinctive new homes.

IMAGE: Some of the sites identified as part of Croydon Council's Brick by Brick project

4. Estate regeneration could deliver up to 360,000 homes



IMAGE www.london.gov.uk/what-we-do/housing-and-land/improving-quality/good-practice-guide-estate-regeneration

A report by Savills in 2016 '*Completing London's Streets*' estimated that London's Local Authority Housing Estates might have the 'potential to provide somewhere between 190,000 – 500,000 homes ... This represents an increase over the number of

The London Mayor wants London's housing estates to be regenerated with resident engagement.

existing homes of between 54,000 and 360,000.' The report argued that many large council estates built in the 1960/70s are laid out in ways that do not maximise land use, so that converting empty street level spaces into flats, shops and community hubs can increase their density 'by at least 50 per cent in this way while retaining the existing homes and community.'[15] The Centre for London, in its 2016 publication '*The Real Storey*' [16] has also estimated that 'densification could add between 4,000 and 8,000 homes to London each year.'

5. Car parks can create space for 75,000 homes

Recent research by the real estate company JLL found that 75,000 new homes could be developed on thousands of car parks across London boroughs.[17] Their report, 'Driving Innovation', states 'there is a growing body of evidence that city centre car parks can be used as housing development sites.'[18] In 80% of the cases identified, it would be possible to build new homes upwards while retaining surface car parking space. Architect Bill Dunster has devised a 'ZEDpod concept': low cost, high quality, space-saving pre-fabricated flats built on supports above surface car parks.[19] 'We could easily build 1,000 of these [homes] in every London borough just on Council-owned car



parks,' he says. 'And that is before we look at supermarkets, schools [and] hospitals, all of which tend to have large surface car parks.'

IMAGE A car park in Croydon which could become a site for much needed new housing

6. Disused garages can create space for 16,000 homes



According to new research from Property Partner, 41% of lock-up garages owned by 24 London councils are empty or in disrepair.[20] The data, obtained through Freedom of Information requests, reveals that London councils own over 22,000 empty garages – equivalent to at least 16,000 new homes. Southwark Council was found to own 1,891 empty garages. If converted into even single-storey flats, these sites could provide at least 1,989

homes. Similarly, Greenwich has enough unused garages for 1,396 flats, Hackney enough for 1,165 and Newham enough for 791.[21] Ealing, Havering, Brent and Enfield are also responsible for thousands of empty garages each.

IMAGE Disused garages are sadly a familiar sight in London. Image: Sludge G on Flickr

7. Reclaiming roads can create space for 16,000 homes



Many of London's town centres continue to be characterised by unnecessarily dominant road systems which could be reclaimed to make space for commerce and housing while establishing attractive town

Hackney Council is consulting on reclaiming land from the Lea Bridge Road roundabout for mixed-use development

centres. If each London Council reclaimed enough road space for a modest 300 new homes this would equate to 10,000 new homes across London.

Hackney Council's Local Plan consultation in 2016 included a proposal to redevelop the Lea Bridge Roundabout[22] making way for a new town centre around Clapton station and new homes in the surrounding area. New road layouts conceived as far back as the 1930s sought very large land-takes envisaging cities with major road networks. Much of this did not materialise but unfortunately some schemes, like the Clapton roundabout, did.[23]

8. Increasing housing densities in outer London could deliver 20,000 homes per year

House-building in outer London is slower than in Inner London. Nearly 70% of all the capital's new dwellings are being built in London Transport Zones 1, 2 & 3. London First reported that most new homes are being built in Zone 2. In 2015 and 2016, there was even more built in Zone 1 than in Zone 6.[26]

In *Superbia: a study of urban intensification in Outer London*,[27] Ben Derbyshire argues "doubling the density of just 10% of the outer London Boroughs creates the capacity for 20,000 new homes per annum. Clearly, increasing housing densities in this way requires a strategic and planned approach with a focus on making better use of existing developed land integrated with the



provision of new and revitalised green spaces.

Building more in outer London could also help deliver more affordable homes. The Smith Institute's recent report '*Pricing Londoners In not Out*' showed that "averages make the whole of the capital appear totally unaffordable and mask the growing differences in affordability within London with a home in the most expensive borough 9 times that of the most affordable outer London borough." [28]

IMAGE: Superbia: find out more about Ben Derbyshire's study of urban intensification in Outer London at www.hta.co.uk/news/posts/supurbia

9. Bringing empty homes back into use can deliver 5,000 homes

Latest figures from Government suggest that there were almost 20,000 long term vacant homes in Greater London in 2016. While it may not be possible to bring all of these back into use,

Let's protect our green spaces and improve the environment by making use of London's wasted brownfield spaces for all our housing needs

concerted action could help reduce this wasted residential capacity. Croydon Council's Empty Homes project succeeded in bringing 137 empty homes back into use last year. From flats bought and later abandoned by developers to unclaimed properties left behind in wills, the Council was able to reclaim and regenerate these unused sites. If every one of London's councils did that, that would provide nearly 5,000 extra homes.

And finally, the supply of brownfield sites is not limited: more comes on stream every year

As CPRE has shown in *'Removing Obstacles to Brownfield Development'*, brownfield land is "a renewable and constantly changing resource". The supply of brownfield land is not limited: more comes on stream each year as the use of urban land and buildings change. In this way it can be seen as a renewable resource. Newly identified brownfield land will create space for more housing in London in years to come. For example, Ealing Council has recently proposed that RAF Northolt, which is not protected land, is redeveloped as a garden suburb with potential for 20,000 homes. According to the Mayor of London's website, London currently has enough major brownfield sites, or 'Opportunity Areas', for at least 302,300 new homes. We can be sure that this is just a snapshot in time and that new brownfield land will emerge to replace that which is redeveloped.



RAF Northolt: Ealing Council is proposing the redevelopment of the site for up to 40,000 new homes. Image getwestlondon.co.uk

NOTES

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