

Why building on London's Green Belt won't solve the housing crisis



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Alice Roberts June 2023

We support house building

- CPRE London supports house building.
- We need new homes.

But just building new homes will not solve the housing crisis...

- And building in the Green Belt is the worst possible option for London: it means losing our countryside and green spaces; creating a high-carbon, car-dependent, unhealthy city; it means inner-city regeneration opportunities are missed; and we fail to tackle the housing crisis.



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The “*To solve the housing crisis we need to build on Green Belt*” mantra has become pervasive

- In recent years developers have persuaded many people that simply building more homes is the only way to solve the housing crisis, saying also that there isn't enough space for these new homes within cities so the only answer is to build on Green Belt. But nothing could be further from the truth.
- This primarily concerns CPRE London because we want to preserve our countryside and more generally we want ‘sustainable patterns of development’ (more of which, later)
- But increasingly our primary concern is that no serious discussion is taking place on solving the housing crisis



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1. No need to build on Green Belt – enough land has been allocated for 20 years of housebuilding

Plenty of space has already been allocated for development – local authorities are also delivering sites – allocating them in their Local Plans – many more than can possibly ever be built out in the next twenty years.

And let us not forget that urban land is constantly recycled: brownfield is not finite.

Land supply is not the problem. CPRE research shows there's space for at least 1.2 million homes on previously developed land and this is just the tip of the iceberg.



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1. No need to build on Green Belt – planning permissions are being granted

Half a million homes already have planning permission but aren't being built. The LGA has said for years – councils are delivering the planning permissions we need.

So..

- The housing crisis is not a crisis of availability of suitable land.
- Nor is it a crisis of failure to permit development.



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3. Allocating land does not translate to more houses being built

Building on Green Belt won't lead to more housing – because simply allocating land does not translate into more houses being built (it just means developers have a choice of sites).

Housebuilding 'highs' were seen in the 1960 and 1970s with the programme of social house building.

Housebuilding is constrained by finance and available skills and workforce.

Most importantly, it is constrained by the market – what can be sold.

4. Building on Green Belt won't speed up house building

The speed at which the market delivers is related to what the market thinks it can sell in any one year – as well as constraints like lack of labour and materials and financing.



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5. Building on Green Belt won't deliver affordable housing

Green Belt developments are rarely affordable: they deliver expensive 'executive homes' in unsustainable locations, marketed for people on high incomes who are able to afford cars – usually more than one.



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6. Building on Green Belt won't bring house prices down

It's frequently argued that the only way to bring down house prices is to increase supply.. but – wherever you put new housing, on the Green Belt or not – this doesn't work – housing markets are more complex and often regulated for this reason.

'Supply and demand' economics are used – saying increasing supply is the answer to the housing crisis. But if demand stays the impact is negligible.

Housing is an essential. Private rents and house prices remain stubbornly high.



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7. Building on Green Belt *will* lead to urban sprawl

Urban sprawl is high-carbon development, car-dependent development – when what we really need is compact cities – where people can live near to amenities, where older people and people on low incomes are not isolated by lack of public transport, where teenagers and even younger children can get about independently, where we do not face air pollution, inactivity-related health problems, congestion, noise and road danger – these are all the consequences of urban sprawl.



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Train stations...

- Often said that “Building around train stations is ‘sustainable’”
- But RTPI research from 2015 showed in reality most journeys are not made on radial rail routes: the majority of trips e.g. to schools, shops, even to work, are not made on the one available rail route
- buildinggreenbelt-commutingpatterns2015.pdf (rtpi.org.uk)

By using travel-to-work data from the 2011 Census, the Royal Town Planning Institute (RTPI) has found that building one million homes around railway stations in the Metropolitan green belt could result in between 3.96 and 7.45 million additional car journeys per week on roads which are already struggling with congestion and delays. These findings also question the extent to which new residents would use trains to access jobs in central London.

- Also: CPRE London’s publication *Driving in Circles: traffic growth in London’s Green Belt*
- DrivinginCircles.pdf (cprelondon.org.uk)

8. Building on Green Belt will mean that urban regeneration opportunities are ignored

The fifth purpose of Green Belt policy is “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

Rather than develop on our greenfield land, regenerating previously developed land and buildings, often left neglected and decaying anyway, can instead breathe new life into our towns and cities, and provide places to call home near to where we live and work.



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9. Building on Green Belt will lead to loss of countryside

... which many of us value – and which is now increasingly needed to plant forests, to tackle climate change, to grow food locally to cities, to help manage rainfall, to moderate the urban heat island effect, to provide habitat to address species decline – and on and on.



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10.Green Belt can be restored, where necessary

... and even where Green Belt is unattractive 'scrub land' (an argument often used to say green belt should be developed), there is no reason it can't be restored and made more useful and attractive (and in fact NPPF says: "Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use")



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A red herring, a distraction

The reality is, talking about building on Green Belt as a means to solving the housing crisis – however we define that – is a red herring. It's a distraction.

Worse, it drives speculation and landbanking which forces prices up further.



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What should we be doing? (1)

We need to build in the right place – making better use of previously developed land within our towns and cities

Two examples in London where widescale release of Green Belt is currently proposed:

- (1) In Hounslow, the council proposes releasing land for logistics for Heathrow, when the airport is surrounded by huge areas of surface car park which could be used to accommodate these needs.
- (2) In Enfield, the council proposes releasing historic Enfield Chase for housing, when there is a vast retail park on the A10 with single-storey retail and surface car parks

What should we be doing? (2)

Why do we keep expecting housing supply to manage house prices down? Increasing supply has never brought prices down: housing markets are much more complex. For one thing, availability and cost of credit are much more important.

- Why are we not talking about how to ensure private rents are affordable; and social housing is actually available to people who need it?
- Should we in fact start talking about ending Right to Buy in England, like they did in Scotland (2016) and Wales (2019)?

What should we be doing? (3)

- Should we introduce rent caps – which the current London Mayor has been calling for for years?
- Should we stop fuelling house prices by subsidising house-buying with “help-to-buy” schemes?
- Should councils have more financial freedoms and powers to build new homes?
- Should we actually level up between the north and south of the country to take the heat out of house prices in the south?



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What should we be doing? (4)

- Should we take action to bring empty homes into use?
- Should we be discussing how to reform the current land value capture mechanisms (S106 and CIL) which are basically tinkering around the edges of what actually needs to be done to address the land value capture issue and stop the accruing of money at the land value level.

**Probably some of these might actually help.
But building on Green Belt will not.**



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Land-use planning and sustainable transport:

*“Sustainable patterns of
development”*



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London's Green Belt: our climate safety belt

Our Green Belt protects us from floods and high temperatures and is a place for nature, leisure and local food production. It promotes regeneration of rundown areas and the development of a compact, low-carbon city.



If we build on our Green Belt, we create a sprawling, high-carbon city with increased carbon emissions, traffic congestion and air pollution and we reduce our ability to manage extreme weather events.



... is under
renewed threat

“Sustainable patterns of development”: at the heart of urban land-use planning

Compact cities with Green Belt

High density

Fewer than 30 cars per 100 households

Low carbon

Public transport financially viable

Active (healthy) lifestyles

Urban Sprawl

Low density

More than 50 cars per 100 households

High carbon

Car dependent

Inactive (less healthy) lifestyles



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Planning for all – remembering we are not all car drivers

- People on low incomes
- Older people – cannot or do not wish to drive
- Young people / families – struggle to afford car ownership
- Teenagers – lose independence
- Car dependency has serious health impacts, not just pollution – but also inactive lifestyles, noise and road injuries and deaths

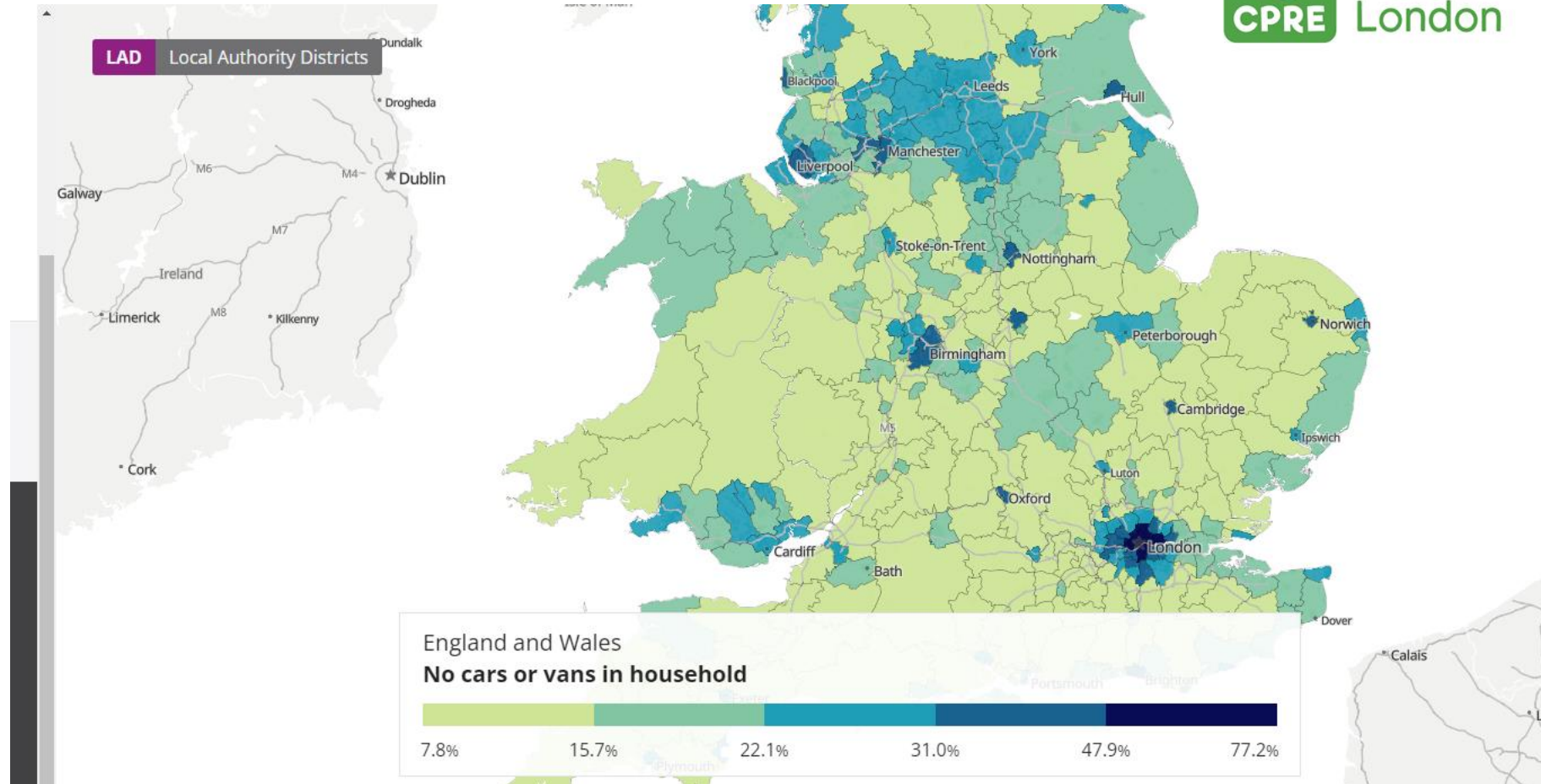


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Often surprising to see the % of households with no car



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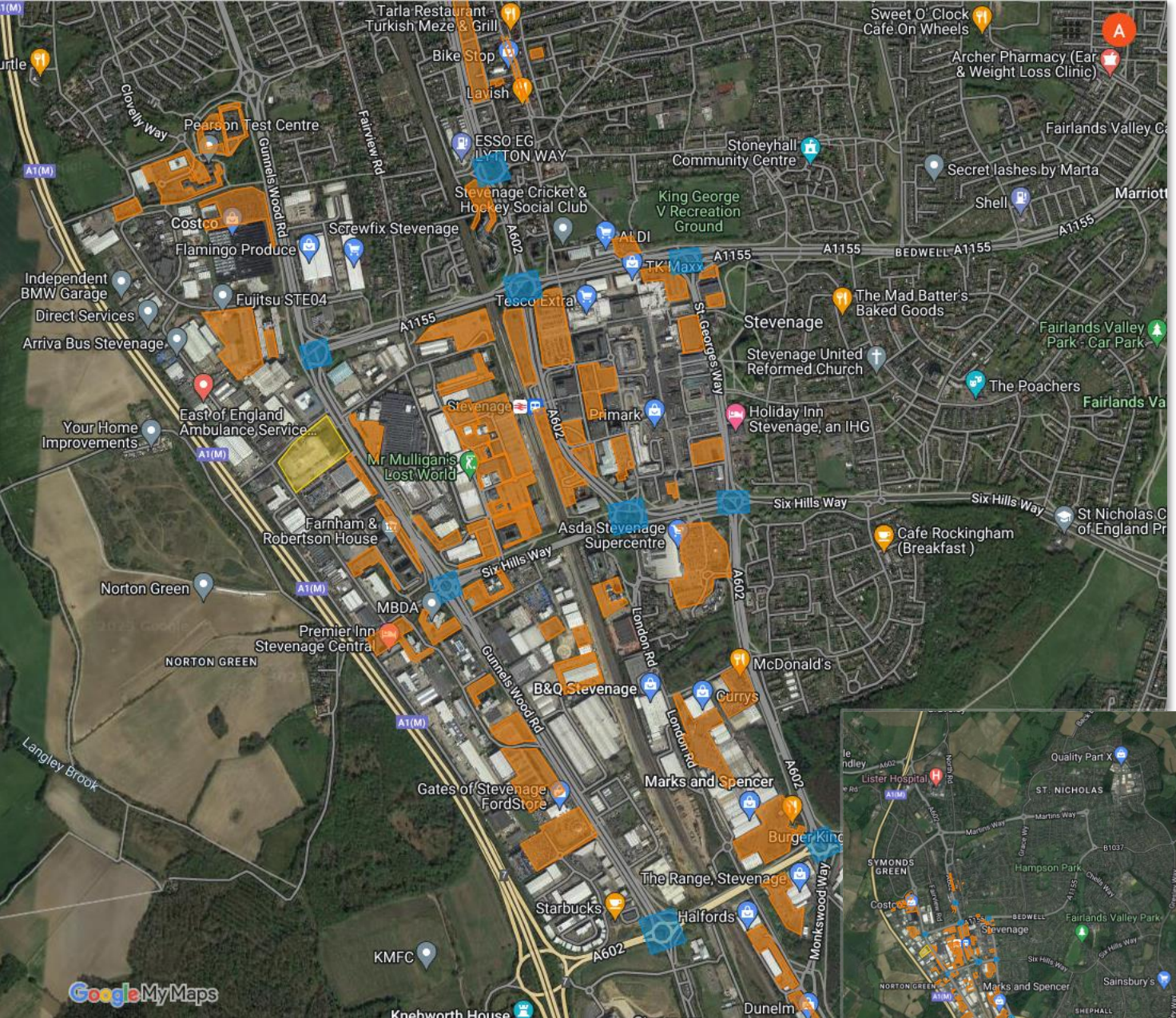


Appropriate Local Plan (planning) policies

- New housing must be **in the right place, within the existing urban footprint**
- New housing must be planned at **appropriate density** to support public transport – in other words at or above around 100 dwellings per hectare and certainly not below 60
- **Parking minimum standards must go:** Councils should be able to adopt ‘car free’ housing development policies (like London Plan)
- Councils need to proactively promote the **redevelopment of surface car parks** and ‘big box’ retail to make better use of space (which will also promote more sustainable travel)



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Stevenage's surface car parks (orange) and roundabouts (blue)

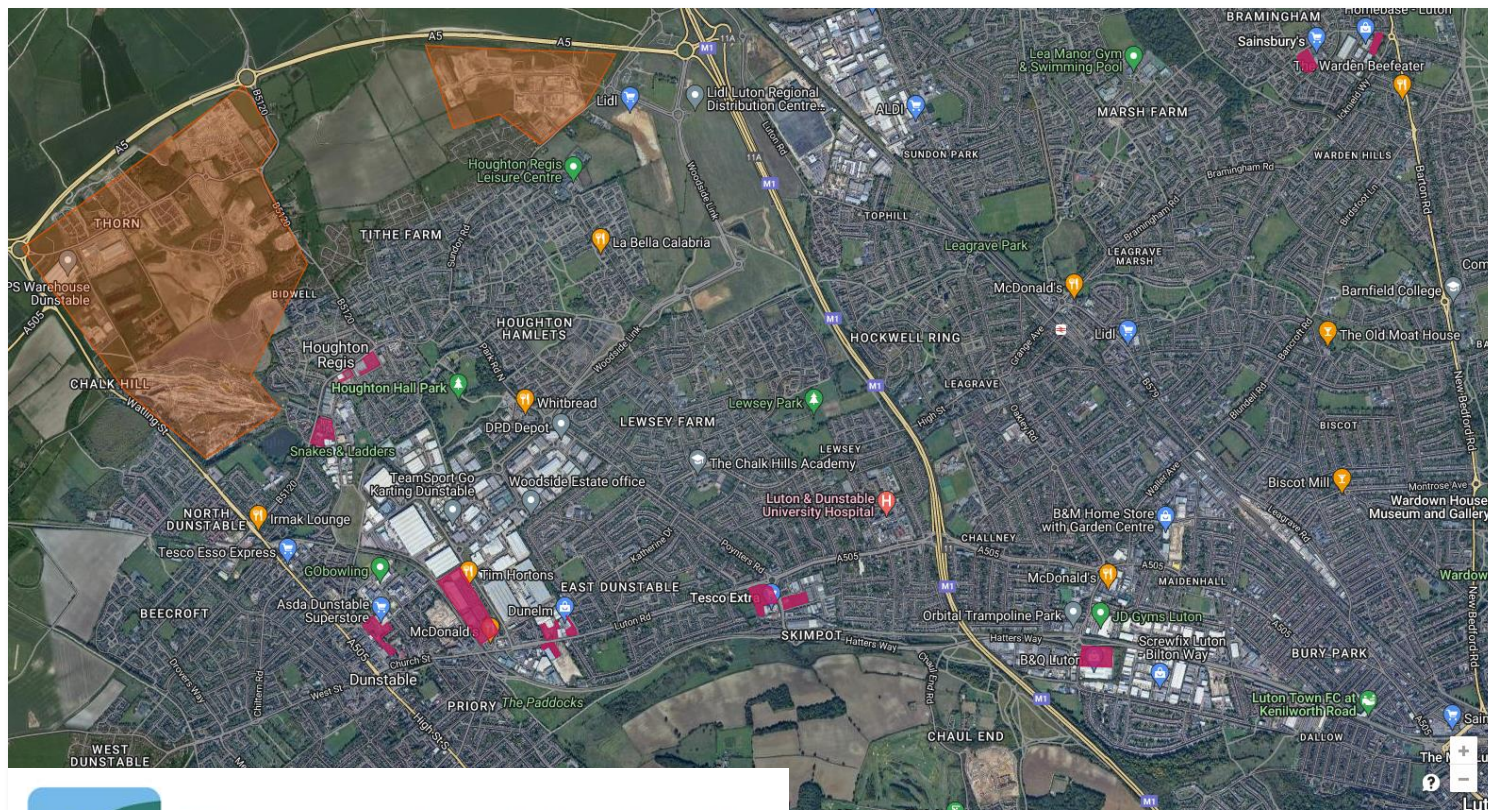
The town was built with cycle infrastructure and it takes 15 minutes to cycle from the centre to the outer edge. But active travel is discouraged by overprovision of parking. These spaces should accommodate car-free or car-lite housing or mixed-use development instead.



Image: Roads Were Not Built For Cars | Where driving is easy, Brits drive

Perpetuating 'unsustainable patterns of development'

Houghton Regis – the new 'urban fringe' development (shown in orange) is 30 to 40 dwellings per hectare, too low-density to sustain public transport. New roads are being built. At the same time there are several surface car parks (shown in pink) which are clearly 'underutilised land' and which, according to the National Planning Policy framework, should be developed before greenfield sites.



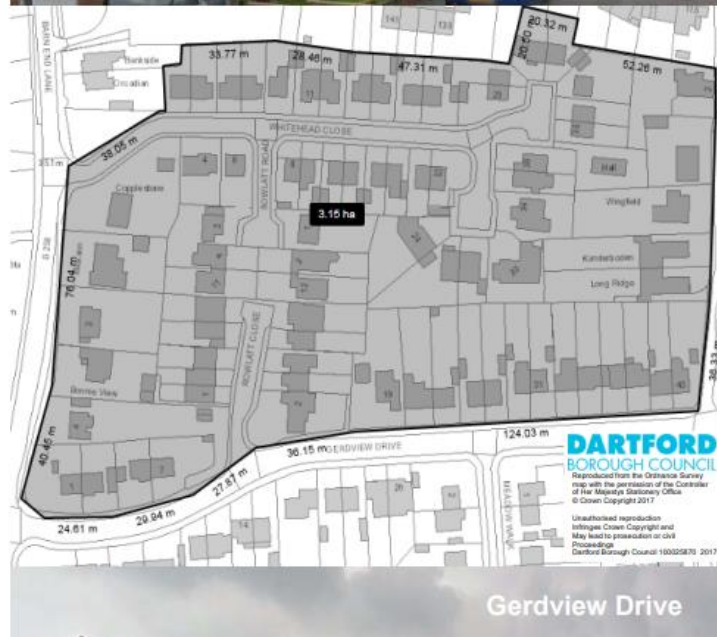
NPPF Paragraph 141

Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account ... whether the strategy: a) makes as much use as possible of suitable brownfield sites and *underutilised land* [our emphasis]

Density is key e.g. bus services become financially viable with densities over 60 dwellings per hectare (dph) though good use of space would mean higher densities, upwards of 100dph.

These two examples show two areas: **25 dwellings per hectare** and **69 dwellings per hectare**

The final existing area is in Wilmington ward, with the first housing site example to the south of the A2 on Whitehead Close, Barn End Lane, Gerdview Drive, Rowlatt Road, Rowlatt Close and Stock Lane. Average house price value on Whitehead Close is £366,000.



Fact File:

- Site area: 3.15ha
- Residual Site Area: 3.11ha
- Homes: 79
- Density: 25dph
- Main housing type: semi-detached and detached
- Community facility

This site area is primarily made up of 3/4 bed semi-detached and detached properties. Houses and gardens are larger in size than previous case studies and others in the rural area.

Examples from:

<https://windmz.dartford.gov.uk/media/20180606320100Housing%20Density%20Paper%202018.pdf>

Fact File:

- Site area: 3.269ha
- Employment/Community Space: 0.13ha
- Residual Site Area: 3.13ha
- Homes: 215
- Density: 69dph
- Main housing type: Terraced
- 16 Lock-up garages

This site is primarily made up of 2 and 3 bed terraced streets, with the average size of a 2 bed terrace on Church Road being 57m².

The site exceeds the CS guide of 35-55 dwellings/ha for other urban areas at 69dph.

Further terraces surround the area highlighted, along with Ebbsfleet Central site and station to the east, and a recreation ground and cemetery to the west.



What do different densities look like?

Note on accuracy: Densities can be misleading because it is not clear whether open spaces are included in the calculation. The density of a *site* is different to the density of an *area* as the latter calculation may include land given to roads, open or green spaces. The densities given here are a guide.

100 dwellings per hectare



[context] Image: <https://medium.com/land-buildings-identity-and-values/can-great-design-help-solve-the-housing-crisis-c70a078d409d>

Also have a look at CPRE London publications

- [10 reasons higher density living is good for communities - CPRE London](#)
- [DoubleTheDensityHalveTheLandNeeded 1. pdf \(cprelondon.org.uk\)](#)



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High density in history

Victorian era housing. Terraced houses have been a popular form of mid-density housing in the UK since the 17th century, and they were first designed for the wealthiest families, like the townhouses for the nobility surrounding Regent's Park. During the Victorian era (1837-1901), it became a popular means of accommodating the rise of working-class migration to urban areas driven by the Industrial Revolution.



Image: fet.uwe.ac.uk/conweb/house_ages/flypast/section1.htm



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A10 retail park, Enfield



‘Big box retail’ needs to be allocated for mixed use development. Sites like this one, the A10 retail park in Enfield (which is mainly surface car park), are hugely inefficient of space and encourage car use. Some sites are so big that whole new towns can be created on them. The image opposite shows proposals for a part of the site which is due to be developed for mixed use (residential and commercial).

Think Green Belt is not important?

Think again!

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