

***HOUSING, GREEN BELT, BROWNFIELD, GREY FIELD:  
A DISCUSSION ON GOVERNMENT POLICY***

***Notes of a meeting held on 6<sup>th</sup> November by Friends of Farthing Downs & Happy Valley***

The Chair, Graham Lomas, welcomed our speakers for this evening: Richard Biggs Leader of Reigate and Banstead Council and Parliamentary Secretary for East Surrey MP Claire Coutino, Shadow Secretary of State for Energy Security and Net Zero; Richard Knox-Johnson, Chair of the London Green Belt Council; and Tom Oliver, Conservation Officer for the City of London's Coulsdon Commons.

By introduction, Graham reminded us that last year the Friends had invited a specialist in Biodiversity Net Gain, Mike Waite of Surrey Wildlife Trust. For this year's AGM our speakers will address the issues affecting the Green Belt, the introduction of the Grey Belt designation and use of Brownfield sites to help us understand the current legislation; major changes proposed by the Government, and the future of the Green Belt due to pressure for housing. The Chair outlined the format for the evening, Richard Biggs and Richard Knox-Johnson will each give a presentation, there will then be an opportunity for questions from those present. Tom Oliver will give a presentation on the history of the City's Open Spaces, including the Coulsdon Commons, to conclude the first half of the evening. The formal AGM will follow the refreshment break.

The Chair introduced Richard Biggs to begin the discussion. Richard will update us on the current position regarding the study by Natural England over the last three to four years on the proposed extension of the Surrey Hills Area of Outstanding Natural Beauty (AONB), which includes areas within the borough, and outline their current thinking regarding the new targets for housing set by the Government.

Richard began by confirming the Council's passionate commitment to open spaces but the pressure to provide homes within this commitment is difficult to balance. The Reigate and Banstead Corporate Plan is currently under Review, its overarching aim to 'enable those that can and support those that can't.' Richard explained that the Council is a plan led Authority – not to have a Local Plan leaves an area open to unregulated development. Tandridge, for example, without a Local Plan, is under pressure from development – areas of Green Belt are surrounded on three sides by development.

Moving on to the Government's proposal for designation of areas within the Green Belt as Grey Belt, Richard believed the description to be too loose – a national policy on developable land is what is needed. He foresaw difficulties as any proposal for development on Grey Belt will need to include fifty-percent affordable homes. Richard gave the example of the recent application for the £1M upgrade of Redhill Station and redevelopment of the car park to provide two hundred and fifty flats. The application was refused as there was no provision for affordable homes. Had these been included, the project would have become financially unviable.

New Government policy has inflated the number of homes required to be built by local Councils annually. This now means that the number of homes required to be built each year in the Banstead and Reigate area has almost doubled from 644 to 1,264. However, in 2012, Reigate and Banstead Council (along with others) had not found it necessary or a legal requirement to regularly update their Corporate Plan and the requirement for housing in their local plan will remain at 460 per annum until 2027. Sites submitted for development are

examined for restrictions, however, Horley has much rural land where 2,700 homes have been built. Current Government proposals will require 20% more development land within the borough most of which is Green Belt.

Richard is not sure how the targets will be met – build high is one answer. The tower blocks planned for Redhill Station reach eighteen stories – but the question is whose need would be met – couples and singles who work in London? The other questions are: how are affordable houses to be provided for families and what is affordable – 80% of market value and 40% of take-home pay? While the Government has reduced numbers for inner London boroughs e.g. Croydon's target for new homes is down significantly, the Government target for new homes in Reigate and Banstead is rising and the Council could lose control of decision making if it is reluctant to meet the targets.

Richard outlined other issues facing Reigate and Banstead. The new NPPF and the Gatwick North Terminal Extension is keeping their policy team very busy, while decisions from Natural England on proposals for the extension of the Surrey Hills AONB (to be re-named National Landscape) are being delayed due to consideration being given to the extension of the AONB into Hampshire. Recent visits to Parish Councils highlighted the concerns of local areas not in the Green Belt – developers prefer Green Belt for its cheaper building costs – Brownfield sites require much more work by developers as sites often need to be decontaminated. What are the solutions: a more comprehensive approach in which the county would be allocated housing targets by constituency; more consultation; Neighbourhood Plans – not just about stopping building but more about where development can take place or not and how can the right environment be created. The need is for homes for local key workers and homeless families, 445 families in borough are now in temporary accommodation, which is not a good situation for them. A balanced way through the problems needs to be found by interested parties who all need to work together to make decisions on where development can take place.

Finally, new legislation on Biodiversity Net Gain, which requires developers to enhance and improve the natural environment is set at the level of 20% by Surrey County Council and this level may be increased. Surrey Wildlife Trust Officers are advising developers on this requirement, a service for which they charge. The health and wellbeing of residents is most important to Reigate and Banstead Council who are willing to work with partners to maintain open spaces.

#### Q&A session:

**Q:** Charles King, Chair East Coulsdon Residents Association (ECRA) and East Surrey Transport Committee (ESTC): Charles referred to the opposition to the Redhill Upgrade by the ESTC which had been on the grounds of the loss of parking facilities which, they believe, would have had a worsening effect on the Station. Regarding large developments, Charles referred to the lack of provision of additional infrastructure, schools, and doctors' surgeries. He gave Coulsdon as an example where additional pressure on local schools meant that children who could not get a place in a Coulsdon school had to travel out of the area.

**A:** Richard Biggs referred to the development at Horley where additional doctors and a school were included in the plans which needed a partnership between the developers, the NHS, and the Local Planning Authority. The developers should have built shops, the NHS refused to provide a doctor's surgery. The key is partnerships – at Pease Pottage, developers first built the

shop and village green which they maintained for 18 months before they sold the houses. A hospice was also built as part of the development. This example proves it can be done. Redhill Station scheme – Gateway to Redhill – which was turned down by the Council's planning committee is an opportunity lost; the development of Guildford Station is an example of the possibilities. The appeal by the developer is still outstanding. Richard referred to the Council's Corporate Plan and that the Council are careful not to lose appeals, but he acknowledged that developments do put pressure on existing residents.

Q: Maureen Levy, Secretary ECRA: Government should make it a rule that for developments over a certain size infrastructure should be built first. Croydon has become more developed in recent years with 5000 new homes built in Coulsdon in the last seven years. These points need to be addressed.

A: Richard referred to the time spent on a place as a concept. With 150,000 residents Reigate and Banstead is small as compared to Croydon. The Borough has a balanced budget with a surplus of £30M per annum. Any money available is invested in the Borough. Currently plans have been submitted to turn an office block into affordable homes, and 50 new Council houses have been built.

Q: Friends Chair, Graham Lomas: How are builders found to facilitate needed developments - Government requires 1.5M houses to be built over the next 5 years. Councils do not build homes and builders will not build if they cannot sell.

A: Richard referred to the issue of land banking which requires land to be built on within 3 years of purchase.

The Chair introduced the second speaker for the evening, Richard Knox-Johnson, Chair of the London Green Belt Council (LGBC) for the last five years.

Richard began with a brief resumé of the achievements of the LGBC which was formed in 1955. The LGBC now has a growing membership which stands at 110 organisations situated within the London Metropolitan Green Belt. LGBC publications include: 'Safe under Us' (2016) and 'The accelerating loss of London's Green Belt – who is to blame' (2017). A detailed map of the London Green Belt was produced by the Friends Chair in 2014 for the LGBC but which needs updating as the constituency boundaries were changed in July this year. The 'All Party Parliamentary Group' and publication of 'A positive Vision for London's Green Belt' were achieved in 2019. The LGBC has a website and organises seminars, the most recent being on the National Planning Policy Framework which was attended by 150 people.

Richard outlined the method of calculating housing need – rather like the Duckworth Lewis cricket score calculator – no one challenges, no one understands. The estimated need for new housing in 2014 is now outdated and a proposed new method has a two-step approach for projecting the need: take 8% of area's current housing stock; apply an uplift of 15% for every unit rated above 4. (see \* below). Richard referred to housing need in Reigate and Banstead – if more houses are built the prices will come down, the current cost of housing, beyond the reach of many, is the reason for the housing shortfall but the current target of 371,500 new homes per annum may not be possible.

Reigate and Banstead's housing target is currently estimated at 644 per annum, this will rise, under the new method to 1,264 = 50% increase. If currently 734 houses are being built per

annum – new method = 42% increase – currently the Reigate and Banstead Local Plan requires 460 per annum – new method 64% increase. However, this is not binding if: ‘There are areas or assets of particular importance that restrict development or if the adverse impacts of meeting need would significantly and demonstrably outweigh the benefits.’ An AONB designation is no guarantee of protection.

Richard showed two maps of the Green Belt, the first, with purple circles, marked areas of new development; the second, with many more purple circles, showed areas for new proposed developments. (see maps below). Richard explained the reasons for the vulnerability of the London Green Belt (LGB): 15 London Boroughs with Green Belt land, 47 Local Planning Authorities and 62 planning districts results in piecemeal planning and development; no overall strategy or vision; LGB is unique in its extent which makes it vulnerable. Richard spoke about action which could be taken to protect the LGB: formation of a London Metropolitan Green Belt Authority; spatial planning (rational organisation of land use, balance between development and environmental protection and social objectives); geographic strategy (strategic geographic change with human needs and development); more consistency between Local Authorities – boroughs with adjoining borders can result in large areas of Green Belt disappearing; a national body for referral of Green Belt development applications.

There are definite benefits gained from Green Belt land – both economic and environmental. Economically Richard understood that the prevention of flooding alone saves trillions, environment benefits from carbon sequestration. Only one Local Plan mentions these issues, generally no attention is given to them. Food production, Richard highlighted the fact that people in London can buy directly from farmers resulting in a £2M per annum turnover. On the issue of health and wellbeing – Professor Jules Pretty, (Environment and Society, Essex University) suggests that 50% of the population suffer from stress. Green Belt land provides opportunities for beneficial recreation and family time. The Green Belt also helps to protect and preserve nature and our heritage and provides opportunities for regeneration of the landscape as well as preventing urban sprawl.

The NPPF24 consultation did not address many issues relating to the protection of the Green Belt. There were no plans to protect high-quality landscape, designated areas or safeguards for the countryside, no plans for a strategic approach to the whole of the Green Belt or checks on urban sprawl – preservation of gaps between towns and London urban centres, no promotion of urban regeneration and use of brownfield sites and no mention of food security.

Finally, Richard addressed the issue of the new designation of ‘Grey Belt’ which will become Government policy. It is without succinct definition but could refer to garages or car parks within the Green Belt but could also result in the loss of thousands of hectares of Green Belt. Other problems include the cumulative effects on openness and attractiveness of open spaces and loss of nature and biodiversity if Grey Belt sites are developed. With the lack of clarity, planning applications will suffer from lack of understanding by the inspectorate. Legal challenges, and difficulty in definitions by consultants and the legal profession will result in delays both to Local Plans and planning applications. Richard posed the question as to whether housing on Grey Belt will be sustainable due to the remoteness of sites, lack of infrastructure, need for car transport and lack of community cohesion. Richard believes that Brownfield sites should be the first consideration. Their location, close to town centres with transport and infrastructure in place, appeals to younger people and affordable housing works for these sites. Local Authorities are required to have a brownfield site register, but currently these are not being compiled. For example, the Council for the Protection of Rural England (CPRE) has

found that in the London Borough of Enfield there are enough brownfield sites to build 37,000 new homes, whereas currently Enfield Council is planning to give approval to planning applications for building on Green Belt land. The CPRE research reveals that there are enough brownfield sites for 1M homes in London.

The issue of the use of Brownfield sites lies with the developers who argue that the cost of brownfield development is too expensive, and they need funding from Government to clear contaminated sites. However, Brownfield developments have economic advantages as they can save infrastructure costs, regenerate urban areas (example Kings Cross), provide affordable housing and create communities. Currently there are 1M homes with planning permission which are not being built. Richard referred to the proposal in East Hertfordshire Council to build 10,000 homes in the Gilston area (now refused). The housing target for East Hertfordshire was set at 17,000 between 2011 and 2033.

Richard hoped that people will get involved with the threat to the future of the Green Belt, he believes that time is on our side – if we hold it up long enough it will disappear! Proposals to make Greater London the first National Park City based on Norfolk Broads example has not been progressed – London is the largest forest City (at least 20% tree cover).

#### Q&A Session:

Q: Don Davis, FoFD&HV: Is the LGBC a voluntary organisation? What are the criteria for development in the Green Belt?

A: Richard confirmed that local Councillors make the decisions on development in the Green Belt. Richard gave the example of plans to build Tudeley Garden Village on Green Belt land. Tunbridge Wells Council eventually dropped the proposals due to action by local residents who opposed the plan for 2,100 homes. Residents had met with the housing minister to put across their concerns.

Q: Maureen Levy, ECRA: Once permission has been given to a planning application, residents need to raise £30,000 to take the plans to Judicial Review. Once permission has been granted it is too late to oppose a development.

A: Richard advised getting legal advice from a solicitor who will write a letter giving a legal response to the application. This would cost £500. Money can be raised on the basis of the letter.

Q: Friends Chair, Graham Lomas: Regarding speculative land banks and focusing on the Surrey Hills AONB, there is much Brownfield and Grey Belt available within the Surrey Hills equivalent to 30,000 hectares of land immediately available to develop.

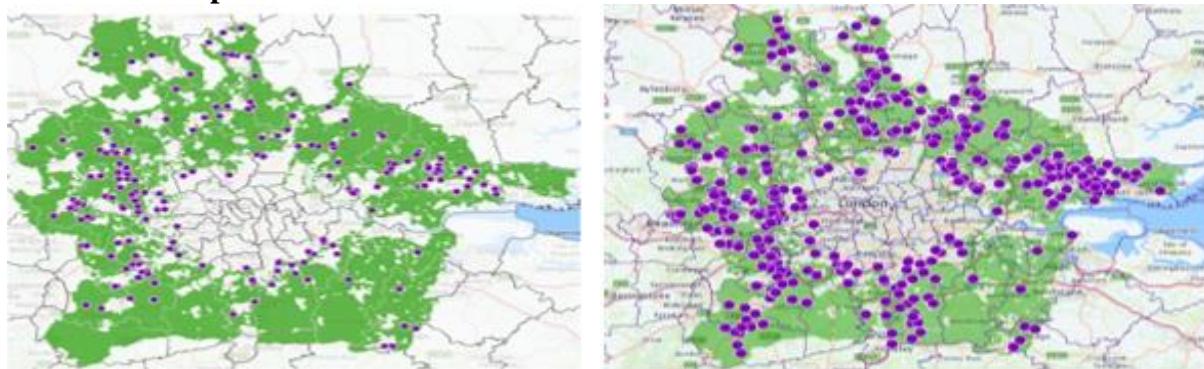
A: Landtech is a company which fast tracks finding sites for developers looking for speculative acquisitions. Referring to the Grey Belt designation, there is no proper definition and food production is not in the developer's interest.

The Chair thanked the two Richards for coming this evening, for their detailed and interesting presentations and explanations of the dangers and pitfalls facing the future of the London Green Belt which is clearly appreciated and valued by those present.

\*Method proposed for calculation of housing need:

1. Baseline figure of the number of new homes needed in an area: Calculate projected household growth for the next 10 years using the government's 2014 household projections for England.
2. Affordability adjustment: Adjust the baseline figure upwards in areas where house prices are more than four times higher than earnings.
3. Cap: Cap the increase at 40% of the baseline or at 40% above the figure set out in the LPA's local plan if the local plan was adopted or reviewed in the last five years.
4. Urban uplift: For the LPAs, whose areas contain the largest proportion of the population of one of England's 20 largest cities or urban centres, increase the figure by 35% after applying the cap.

### Green Belt Maps



The Chair introduced our last speaker for the evening, Thomas Oliver, Conservation Officer for the City of London's Coulsdon Commons who will give a presentation on the history of the City's open spaces.

Tom began by listing the land acquired by the City an acquisition dating back to Victorian times. This included the Coulsdon Commons: Farthing Downs, Kenley Common, Coulsdon Common, and Riddlesdown. The City also acquired a large area of Epping Forest in Essex and Burnham Beeches in Buckinghamshire. The City's Head Office is in the Guildhall.

In the 1850s and 60s the Coulsdon and Kenley Commons and Riddlesdown were a Manorial landscape, a wasteland used by local people to graze their animals. The land was collectively owned by the Byron family. The building of railways pushed London further out, so land was needed for development. Wasteland (common land) was put under pressure from threat of enclosure and loss of 'rights of common' enjoyed by local people (known as commoners). Tom showed the image of a painting by local artist Ethal Hall – a rural scene which looks from Farthing Downs across to the Quarry and Memorial Ground (Marlpit Lane).

Reaction and complaints from local people about the Byron's proposals to enclose the common land was challenged in the High Court and the family were forced to sell the land. The City of London was then approached by residents who realised that the City had the money to buy the land from the Byrons. This ownership of land specially for public use came eighty years before both the creation of local parks and the National Trust by Octavia Hill. The Coulsdon

Commons were acquired under the Corporation of London (Open Spaces) Act 1878 which enables the City to manage the Commons in perpetuity – meaning no building.

Tom showed us a photograph of Rangers from West Wickham in former times wearing a three-piece suit, bowler hats and carrying a cane – very different from the informal dress of today's Rangers. The Coulsdon Commons is cared for by ten full-time Rangers assisted by volunteers. Maintained since 1883 the Coulsdon Commons has two Sites of Special Scientific Interest (SSSI) and is habitat to eleven species of chalk grassland flowers.

Epping Forest, the largest urban forest and open space in London, rich in ancient trees, biodiversity, and home to ground nesting skylarks, is also close to urban areas. Tom gave a brief history of how the Forest was saved from development. In 1871, 30,000 East Londoners protested about fences being erected in the Forest – Tom showed an image of protesting Commoners smashing and burning the fences. The protest attracted the attention of the Royal Family who stepped in and stopped any further development. In 1872 by act of Parliament the City gained the right to buy what remained of the Forest – 10% had been lost to development. The City has since managed Epping Forest in a similar way to the Coulsdon Commons but with very many more Rangers.

|More recent acquisitions include New Hill – building along Chaldon Way was stopped in 1940 but plans for New Hill existed and Tom showed us plans with Road layouts and electricity stations. During WWII, New Hill was used for agriculture and then was left fallow until it was bought by the City with help of donations from local residents. In 2005 the City bought Woodplace Farm Fields, again with donations from local residents. Tom believed that often saving open spaces requires co-operation between Local Authorities and residents as the above examples demonstrate.

The Chair thanked Tom for coming this evening and for his interesting and comprehensive history of the City of London's Open Spaces.