

A 21st Century Metropolitan Green Belt



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We are grateful to our steering group who contributed generously of their time and expertise throughout. We have included their affiliation below but they all contributed in a personal capacity. The content of the report does not necessarily reflect either their individual views or those of their organisation.

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Three abbreviations are used throughout the report:
MGB - Metropolitan Green Belt
NPPF - National Planning Policy Framework
WSE - Wider South East
Each is explained on first use.

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Executive Summary

Origins and aims of the Metropolitan Green Belt

The Metropolitan Green Belt (henceforth MGB) has been proposed since the late nineteenth century but was first realised in the 1930s, and expanded under Abercrombie's 1944 Greater London Plan. After decades of growth the MGB measures 5,160 square kilometres and covers parts of 68 local districts and London boroughs. Local planning authorities do have the power to modify the MGB through ad hoc reviews, although only in 'exceptional circumstances'. These can include a shortage of housing land (though this alone doesn't guarantee that change will be permitted).

An early reason for proposing a MGB was to give access to the countryside but later it was to physically constrain the growth of London. The *current* aims of the policy are set out in the National Planning Policy Framework (NPPF), which says that "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open". To do this it seeks to check unrestricted sprawl of large built-up areas, keep neighbouring towns from merging, safeguard the countryside from encroachment, preserve the setting and special character of historic towns and promote urban regeneration by encouraging the recycling of derelict and other urban land.

Despite the name, Green Belt is not an environmental designation — in fact Duncan Sandys, the minister responsible for its expansion in the 1950s, said Green Belt land did not have to be green or even particularly attractive, as its purpose was to stop urban development. However, government guidance suggests that after establishing a Green Belt, the local authority might want to improve public access, provide recreation opportunities or improve the appearance or quality of the land — but actual use or enjoyment of the Green Belt is clearly seen as an incidental benefit of the policy.

In the post-war period there was a two-pronged approach to directing development in South East England: the MGB constrained the supply of land, and at the same time New Towns were created to house people dispersed from larger cities including London. This link between state planned constraint and development (and the cross regional approach), although never perfectly realised, has long since been broken.

Effects on London and the South East

The need to greatly increase the supply of housing is not limited to London: other parts of the Wider South East face serious difficulties providing enough housing for their own populations, never mind in-movers from other areas. If the capital cannot meet its own housing demand then Londoners will move out, adding to housing pressures across the region. But the fact that decision-making is divided among so many authorities, with no regional co-ordination, has created a 'beggar-my-neighbour' situation: few of the

surrounding authorities are planning to build enough housing even to meet their own needs, and London's underproduction is well known. Each local planning authority expects (or hopes) that its neighbours will take up the slack. The 'duty to cooperate' will not produce a strategic response to the region's housing needs.

The housing supply crisis is complex and has no single cause, but one important prerequisite for solving it is to find enough land for building. Since 1995, policy is for the majority of building to take place on brownfield land, and indeed this is an important and necessary option. But in practice brownfield cannot supply enough land to meet projected housing needs. In London almost all of it already has existing uses; much is contaminated and/or has access problems; and often brownfield sites are too small to interest volume housebuilders but too complicated for small firms to take on. Densification of existing built-up areas can also contribute to accelerating supply — but again will not be enough on its own.

The MGB contributes to the housing crisis by 'locking up' potentially developable land. But importantly it also changes the pattern of residential land use in the region by forcing development to take place outside the MGB, leading to longer commutes.

Politics

The MGB commands strong support from local people, politicians and central government. No radical review or reform is currently being contemplated; government guidance makes clear that the current size of the MGB is more or less set. Opponents argue there is confusion over what the MGB is. They argue that it mainly consists of intensive agriculture and golf courses, meaning that much of it offers little in the way of amenity to the general public. Supporters argue this is to miss the point: if the main purpose of the MGB is to act as a barrier then land use or quality is a secondary consideration. But the NPPF justifies MGB on the promise of future improvements to quality and access.

Defenders of the MGB sometimes express a fear that any de-designation would open the floodgates to new development. In fact, though, there has been continual incremental change, and the absence of an overall plan for change has led to piecemeal development in the MGB.

Options

The reality is that the MGB is changing now and will continue to change. Should this piecemeal, uncoordinated change continue, or is there a better way? In principle the options range from increasing the number of approvals within the MGB without formal policy change, to removal of Green Belt protection completely, leaving only other forms of environmental designation. We suggest using six criteria to judge change:

1. Will it help deliver more affordable housing?
2. Can it limit environmental losses, including loss of openness?

3. Will it limit increases in private car use?
4. Will it reassure people that the remaining Green Belt is safe?
5. Will existing residents benefit, including from improvements to the remaining Green Belt?
6. Will it support better planning for growth in the Wider SouthEast?

There are three approaches that score highly against our criteria.

The first is to allow development within walking distance of existing public transport nodes in the MGB (so-called 'ped-sheds'), on land that has no other environmental designation. These locations are relatively sustainable in travel terms, and generally already support some development. Estimates suggest that this would free up land for up to a million homes. However this approach would not reshape patterns of development in any fundamental way—and in practical terms many of the rail lines are already severely congested.

The second promising possibility is to concentrate development in a few bigger garden cities or (more likely) urban extensions. Such settlements could be built at higher densities, minimising land take, and provide new services for existing residents. However if this were carried forward through specific initiatives (rather than national policy) the effect on land supply and housing development would likely be small in overall terms.

The third approach would be to allow more development along the coordination corridors already described in the London Plan. This approach would allow for maximising the 'green' value of the wedges that would separate these corridors and settlements within them. The corridors, structured around the main transport routes in and out of London, would not be continuously developed but rather would see a chain of centres along public transport links. These could provide additional housing, of course, but also space for the commercial and industrial uses that are increasingly being squeezed out of London itself. Importantly, the corridor approach signals the intent to make more land available without seeking wholesale de-designation of the MGB.

Putting ideas into Practice

Turning the ideas into practice will require attention to two elements, conditions and collaboration.

Any new model for the MGB must meet several conditions. Whether a corridor or an alternative model, it must provide a way to capture the land-value uplift from areas where development will be permitted; it must integrate housing (much of it affordable), employment and public transport; it must optimise densities. Crucially, it must enhance the elements of the MGB that remain.

Given long-developed interests in maintaining the MGB and political sensitivity, co-operative coalitions of the willing should be actively developed to **secure a consensus within the corridors about how MGB release should be managed for mutual benefit.** For active and realistic collaboration it is particularly important that London not only

continues to pursue internal policies of intensification but also plays a leadership role by reviewing the current appropriateness of its own part of the MGB.

As far as MGB land within Greater London is concerned, national policy's core concern with maintaining a physical separation between London and other urban areas scarcely applies. In these terms there is a logical case to **let London selectively develop on Green Belt within its own borders**, subject to meeting the conditions set out above. Although London has a 'regional' structure in the shape of the Mayor & Greater London Authority, the NPPF leaves MGB review to the boroughs. There is potential to **give the Mayor a strategic role** including through developing a London-wide review of the MGB. As in the case of the 'corridor', a legal change would be required, in this case to allow the Mayor to oversee a strategic review.

A Pioneer Corridor

Seeking change to the Green Belt in all the coordination corridors at the same time would likely meet great resistance. And in any case, it would be very useful to test the idea first. Therefore, we propose the identification of a 'pioneer corridor'. This would send a strong message about change, while give the opportunity to accumulate experience about how positive change can be secured. Collaborative structures are at an advanced stage in the coordination corridor running out through Cambridge. This includes the presence of the 'London, Stansted, Cambridge Consortium'. Therefore, we suggest this as a pioneer corridor.

The 'pioneer corridor' approach focuses on local action for several reasons: to get things moving; to build necessary bases for collaboration and consensus; and to learn about which strategies and which kinds of regulatory change are necessary or ineffective. However, because Green Belt policy is highly centralised, the 'pioneer corridor' would need to provoke modifications to (or exemption from) NPPF procedures to deliver on the ground. Therefore, the logic of the corridor approach is that it should lead to some significant revisions of national policy - either by giving local authorities greater flexibility to de-designate Metropolitan Green Belt comparable with that they previously enjoyed in getting areas added, or through a more surgical excision of particular strategic sites from the scope of the MGB.

1. Introduction



The Metropolitan Green Belt (MGB) refers to the Green Belt in London and neighbouring areas in the Wider South East (WSE)¹. It is an effective but blunt policy instrument, which has ensured both a high degree of enforcement and a range of unintended consequences of real significance. It has also generated very polarised discussion about its future. For decades, critics have seen it both as pushing up accommodation costs, thus restricting housing access for WSE residents, and as extending commuting distances, since those in search of cheaper space leap-frog the MGB and commute back across it². Some, then, have called for its abolition, to allow greater freedom for market forces to determine where (and how much) new housing should be constructed. Conversely defenders of the Green Belt see any change in its coverage as threatening its demise, leading to a widespread renewal of urban sprawl, with a degradation of the environment impacting on residents' quality of life. Such a broad-brush and polarised 'debate' is particularly unhelpful at the present time, when the WSE as a whole clearly faces a crisis of housing supply with realistic estimates of provision now falling far behind need. This project aims to look more constructively for ways in which the MGB could acceptably be re-shaped to enable a more elastic supply over the long run, without impinging on its more positive functions.

The MGB was introduced with good intent, as part of an integrated planning strategy, at a time (in the 1940s) when only minimal growth was expected to materialise in the region. In very different times now – when the regional economy generates great growth pressures, and other planning instruments have been greatly weakened – it clearly imposes very considerable social costs³. The cost of restricted land supply is to be seen not just in the present crisis of housing numbers and affordability, but also in longer term issues of internal space standards and the design quality of dwellings. Our call for a serious review of the MGB is not intended to open the way for an unfettered market free to concrete over green fields at will. Rather it is an effort to get the MGB put on a sustainable basis as part of a planning framework offering adequate and realistic long-term options for the housing of present and future residents, while securing the environmental quality of, and access to the MGB⁴.

We recognise that resolving the regional housing crisis and securing longer term balance in its housing markets will require commitment to a multi-pronged approach,

1 Originally christened the Greater South East (GSE) by Peter Hall, but with WSE currently being used to refer to areas within the former government office regions of the East, South East and London; the broader GSE definitions also include Dorset, Northamptonshire and Wiltshire.

2 Notably Peter Hall et al in their 1973 study of The Containment of Urban England, Allen and Unwin.

3 Protesting at some of the Urban Task Force recommendations in their 2005 second report, Peter Hall noted that a range of policies constraining land supply were, '...causing an unprecedented increase in apartment construction, unsuitable for families with children and undesired by potential residents. [And that further restrictions]...however well-intentioned, would – if implemented – deepen the well-documented housing crisis that faces us and our government.' P19. [online] http://www.integreatplus.com/sites/default/files/towards_a_strong_urban_renaissance.pdf

4 Edwards, M. (2000). Sacred cow or sacrificial lamb? Will London's green belt have to go? City, 4(1), 105–112; Cheshire, P. (2013) 'Greenbelt myth is the driving force behind housing crisis', The Conversation, September 9th;. Cheshire, P. et al (2014) 'Planning reforms that might work and ones that won't', ch. 6 Urban Economics and Urban Policy: Challenging Conventional Policy Wisdom, Edward Elgar.

maintained over an extended period. This will include continuing efforts to intensify urban land usage (notably in London, but in other urban centres as well), through brownfield regeneration, estate renewal and selective suburban densification. But, as we see it, these will never suffice, nor will they be really effective on their own terms so long as land supply in the remainder of the region remains as tightly constrained as it has become. Hence, we argue that a city-regional approach including substantial reform of the MGB for contemporary circumstances also needs to be developed and pursued. We acknowledge that this will not be an easy or quick task, given the strength of attachments to the inherited version of the MGB. But that is a reason now for shifting attention from broad-brush questions about whether this Green Belt is crucial or seriously injurious for living standards and quality of life, to examining ways in which a modernisation of the MGB could and should appropriately and acceptably be achieved.

Green Belts are implemented through local plans but their purpose is set in national planning policy. Despite a wider initiative to liberalise and localise land use controls through the 2010 National Planning Policy Framework (NPPF)⁵, the Green Belt remains a national policy commitment for the Government who have stated firmly that no radical review or reform will be contemplated. Local communities often have strong stakes in Green Belts as a reliable defence against development pressure.

In practice, the MGB is subject to piecemeal, small-scale; change through ad hoc reviews and exceptional permissions granted for development, sometimes through the courts – and there are indications that pressure for both of these has been growing in the last few years. There are other signs that the scope for more managed change may be growing, with:

- a wave of calls for reform by think-tanks and professionals
- evidence that public attitudes to local house-building have become much more supportive
- evidence that attachment to the notion of the Green Belt has more to do with a general desire for greenness than for using belts to stop urban expansion⁶.

Even if central and local government become more receptive to the idea of planned change in the MGB, securing and coordinating this would be complicated by the surrounding politics. This is partly a matter of administrative fragmentation. Seven counties and Greater London are partly covered by the MGB. This includes 68 separate local planning authorities, with no mechanism for strategic co-ordination, except by the Mayor inside Greater London.

However it is also a matter of perceived conflicts of interest between London and other parts of the metropolitan region/WSE. The original purpose of the MGB, as enacted, was to physically constrain the growth of London, and for much of the subsequent period there was also a formal divide between London and the neighbouring regions. There has been no such separation, however, in terms of housing markets, and the reality has been one of continuous net outflows of

⁵ *"The National Planning Policy Framework sets out the government's planning policies for England and how these are expected to be applied"*.

<https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁶ These are discussed in 3.4 below.

households across the London border⁷. This background makes it very easy now to see any calls for change in relation to the MGB as involving an attempt to grab more land to house 'Londoners', since, while 22% of London is Green Belt, 93% of the MGB sits outside the GLA area (figure 1).

The crisis of housing supply extends far beyond London and represents a shared problem for communities across much (or all) of the WSE. But for there to be a shared will about the role of tackling this (including the reforming of MGB), there needs to be a sense of fair contributions and shared rewards all round. This must start with the sensitive issue of equity between London and the rest of the WSE^{8,9} as well as between Green Belt and non-Green Belt communities. Therefore, looking at ways of achieving political consensus is an essential part of the issue of MGB reform that this project seeks to address.

While the housing crisis is not just a London problem there is a particular London dimension to it. London's share of construction in the WSE has greatly increased since 2000 and is now actually proportionate to its share of the population. In addition, it has packed many more people inside its borders – adding to the numbers of dwellings it is expected to supply in future. As was made clear in the 2014 Inspector's report on the Further Alterations to the London Plan, however, active intensification policies have not brought either achieved or likely building rates anywhere near this target. That is also true across much of the WSE, however. What is special about the London situation – apart from its peculiar attraction to international migrants – is that it is the dominant centre sitting in the middle of this region, the whole of which has a residential land supply problem under current policies.

The issue is critical now, both in relation to likely growth pressures in London and across the WSE and because of the point which the continued ratcheting up of housing costs has now reached, with severe implications for the living space and quality of life that younger generations can expect and, if they are unwilling to accept these, for continued employment growth in this core region. While a halt to this growth might be appealing for some, it has costs for the economy, and means that we are excluding people from opportunities this region could offer them.

Given all of the above, our aim is to promote constructive debate on two sets of issues:

1 the appropriate purpose and future form of the MGB inside and outside Greater London in the context of contemporary housing provision, changing socio-economic patterns and sustainability goals; and

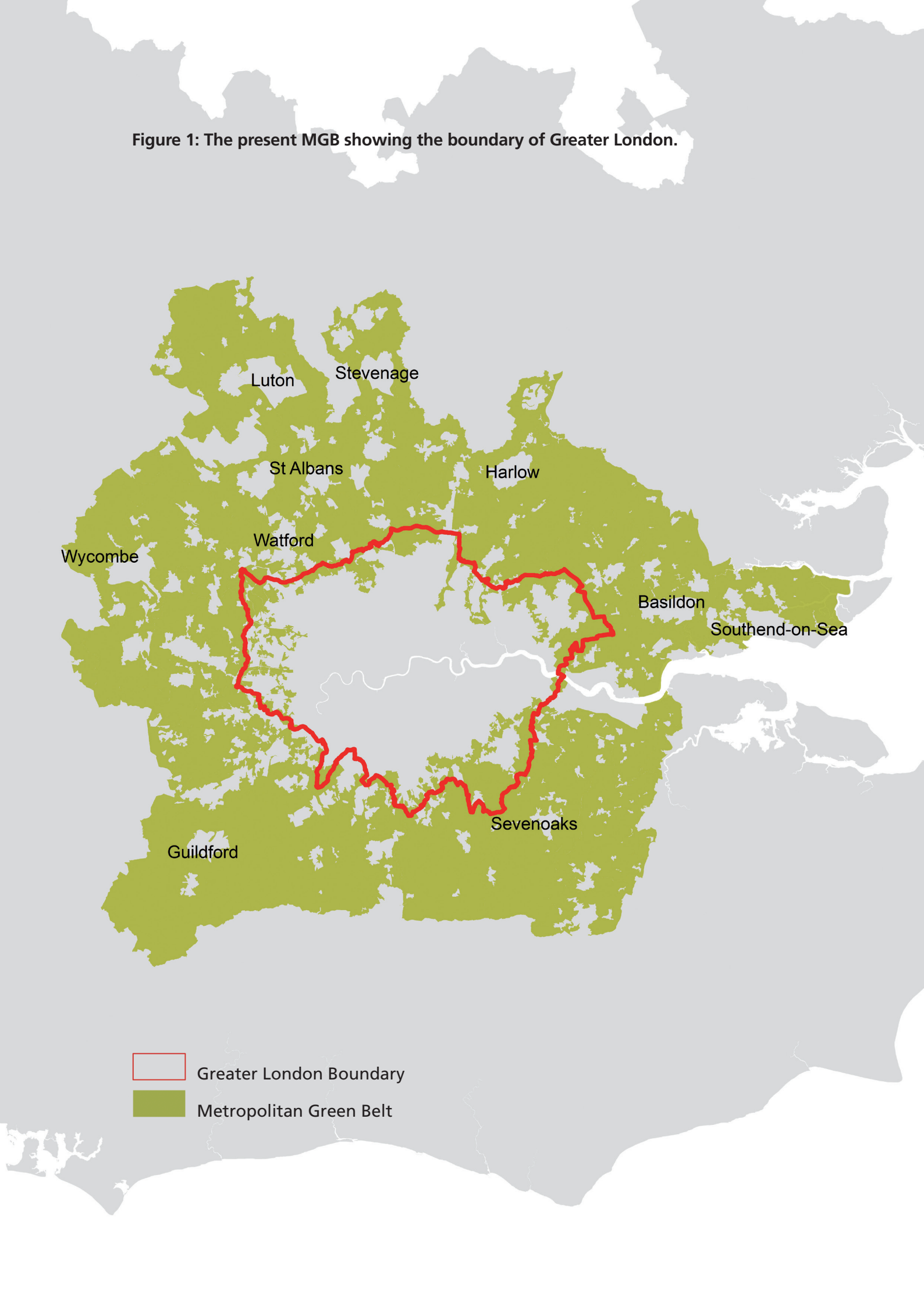
2 how, in an era of localism, some desirable version of this can be achieved on the basis of willing, collaborative action involving partners across the WSE (and central government) so as to meet the collective needs and aspirations of the region's present and future residents.

7 As now is also the case across the outer boundary of the WSE to its neighbours, in the Midlands, South West and even Wales.

8 London's refusal to build on green belt land causes concern among neighbours. 2014. http://nlpplanning.com/blog/londons_refusal/

9 And, specifically, addressing the sense expressed at the first meeting of the Regional Summit last year, that London must make an early commitment to reviewing its own part of the MGB.

Figure 1: The present MGB showing the boundary of Greater London.



In this context, the purpose of this project was to identify ways of modernising the MGB that would:

- enable a higher level of housing supply to be achieved
- on a compact basis in sites with good public transport access to employment centres
- without impinging on areas of particular environmental quality
- to secure the protection of the rest of the MGB.

Implicit in our aims is a firm belief in the need for change. This comes both from the lessons of established analyses of the MGB's long-run impacts on the WSE's housing and labour markets, and our reading of the current housing crisis. In addition to this we have been influenced by a series of recent reports - many produced by participants in the project¹⁰. We have sought first to test and refine our understanding of the issues through a series of workshops and numerous one-to-one meetings, and then to reflect that in this report, together with proposals for ways of starting to address these issues.

Given the range of material already available elsewhere, we draw attention to four elements particular to this report:

- while the basis for the project is a judgement that change is required we have sought to moderate an often-polarised debate, in the interest of finding ways forward, rather than arriving at a judgement about the rights and wrongs of the MGB;
- in doing so we have emphasised the regional nature of the issue. While the MGB covers many areas, at the edge of London and beyond, the housing supply crisis impacts upon residents (and thereby businesses too) in all parts of the WSE;
- given the diversity of interests involved, we have also tried to directly address the politics of the issue, and explore ways in which necessary consensus for change may be more readily arrived at;
- finally, we have sought to set out a way forward, with choices among alternative kinds of reform on offer, and consideration of how a process of change could best be initiated.

In section two, 'The context', we provide a brief overview of the development of Green Belt policy. We show that both its purpose and form have changed over time. This opens up the possibility of rethinking its purpose and form in the future perhaps by returning to some old ideas. The MGB has been incredibly durable over time. But, looking at changes in housing demand across the WSE, we argue that a point has been reached where some adaptation is required. This is because of changes both in other planning policies and in the economy since the MGB was established, and also because of a need to have multiple lines of action to deal with the severity of the housing crisis.

In section three, 'The Purpose and Value of the Metropolitan Green Belt', we emphasise the need to be clear about contemporary policy is and is not trying to do, in order to understand how best to modify it. Some clarity about what this is vital in order to move

¹⁰ See for example footnotes 12, 18, and 31.

beyond polarised for-or-against debate and to identify which elements of the MGB should be kept/reinforced and which changed, in order to meet all the relevant goals.

This is a first step in confronting (what we recognise to be) the very limited political appetite for change, at either a national or local level. In the face of a centralised policy and entrenched local interests we believe that the case for change will best be made by working up examples of MGB reform to show what it could deliver. In section four, 'options', we make a start by running through the logical possibilities, running from the present options for incremental change, through proposals for more strategic approaches - focused on transport nodes, new settlements or broader wedge/corridor concepts – and then on to some more comprehensive de-designation.

This leads us in section five 'Translating Reform Ideas into Practice' to seek a course of action reflecting both the possibilities and shortcomings of such options, and the institutional preconditions for adopting and pursuing them. This addresses the relation between action in London and outside, as well as the strength of attachments to the present MGB. It also addresses fears of a slippery slope effect, with any change being perceived as opening the way to a wholesale undermining of MGB and the loss of its really valued aspects. In the final section, 'Summary and Conclusions', we review our main points, specifically: the *necessary* conditions to make specific schemes acceptable; mechanisms for *collaboration* and *leadership* within the region, and the merits of a *pioneer approach*, building from a pilot initiative in one coordination corridor.

2. The context



- Both the reasons for having a Metropolitan Green Belt and its size have varied substantially over time. It is not a single idea with only one possible form.
- Other options have long been canvassed, such as green wedges and corridors. The appropriate choice of options depends on both purpose and context.
- Despite the enormous incremental growth of the MGB over decades, without any strategic review, the government believes its present size to be the appropriate one.

2.1 The Growth of the Metropolitan Green Belt

The idea of a Green Belt for London has a long history, during which the reasons for having it and its scale have changed substantially. Here we focus on the ‘modern’ MGB¹¹ with its roots in the second half of the nineteenth century when London was the biggest city in the world by population¹². In the late 1800s a Green Belt was envisaged as a series of open spaces in and around the city, giving residents better access to open space. An actual ‘belt’ was only one of a number of options proposed. Alternatives included green wedges or corridors of green space running into and out of the city giving access to green space. In a fanciful manner, the present day Green Belt is sometimes referred to as the ‘green lungs’ of the city¹³ – in which case one might imagine them better placed within the body, as internal wedges. Elsewhere, a combination of green wedge and Green Belt has been tried (and sometimes achieved), as exemplified today in Harlow where a series of wedges are integrated within the town, leading out to the MGB. In practice, these appear more as a green-web or network rather than green wedges. The MGB as a whole, however, serves more purely as a belt (or corset as some have suggested), despite continuing suggestions (e.g. from Peter Hall) to re-shape it in wedge form.

The use of the Green Belt to limit physical growth was a response to the expansion of London enabled by developments in transport technology. Buses, trams, ‘suburban’ trains and the Underground all contributed and, with the rise of the car, ribbon development along major roads further fuelled calls to contain London¹⁴ and to maintain views of countryside. This development, along transport corridors, might have been managed by green wedges inbetween or alongside transport corridors. However, this was not to become the dominant policy (maybe partly because it would not maintain country views for motorists coming out from urban areas?). The intention of using a Green Belt to restrict the growth of London was first raised in 1924 in a London County Council Town Planning Committee when a half-mile wide belt was proposed¹⁵. The purpose of ‘stopping further

¹¹ Earlier attempts to limit the size of London go back as far as Elizabeth 1.

¹² Manns, J. (2014). *Green Sprawl: Our Current Affection for a Preservation Myth?* London Society report.

¹³ Including in 2014 by the then Secretary of State for Communities and Local Government Eric Pickles when justifying a ‘strengthening’ of Green Belt protection.

¹⁴ Leading to the ‘Restriction of Ribbon Development Act’ of 1935.

¹⁵ Thomas, D. (1963). *London’s Green Belt: The Evolution of an Idea*. *The Geographical Journal*, 129(1), 14-24.

urban development' was reiterated in the 1950s when Green Belt policy was rolled out nationally. The aim of containment is reflected in the present five functions of the Green Belt set out by the Government in the NPPF:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The NPPF additionally notes; "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently¹⁶ open"¹⁷. In addition to the five functions it therefore introduces a test of 'openness' as a consideration in applications for development on any Green Belt land. The Green Belt is, therefore, primarily an aesthetic policy that seeks to preserve a clear distinction between 'town and country' by tightly delineating towns and cities. Duncan Sandys, the minister who encouraged Green Belt expansion in the 1950s, stated that as the purpose was to contain urban development, Green Belt land did not have to be green or particularly attractive¹⁸, it simply needed not to be built on.

Despite the 'green' in the title, Green Belt it is not an environmental designation. Environmental designations include Sites of Special Scientific Interest (SSSI), Areas of Outstanding (AONB) and National Parks. These protections can and do overlap with Green Belt producing a double designation. However, government guidance supports the idea that once a Green Belt has been established to restrict urban growth, then, an authority might look to how that land is used, "...such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land¹⁹". This is sometimes expressed in evocative terms, the ministerial forward to the NPPF of 2012 suggests that "land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul"²⁰. However, this is only a potential and incidental benefit and not the main purpose of the policy. It does not have a direct social or environmental benefit in the sense of necessarily producing high quality countryside or offering access to open space. We calculate that only 30% of the MGB has public access (Figure 2). In London this is slightly higher at 32.5% (Figure 3)²¹. Much of this land would have access without being in the MGB as it includes parks and public rights of way.

¹⁶ *Sprawl is an emotive and subjective term that is not defined in the NPPF.*

¹⁷ NPPF para 79 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60771/2116950.pdf

¹⁸ London First., Quod., & SERC. (2015). *The Green Belt: A Place for Londoners?* <http://londonfirst.co.uk/wp-content/uploads/2015/02/Green-Belt-Report-February-2015.pdf>

¹⁹ NPPF para 81.

²⁰ NPPF Ministerial Forward.

²¹ There is some difficulty in producing an accurate figure. The maps below combine parks and gardens, common land, Country Parks, and land designated as publicly accessible under the CROW Act.

Figure 2: Land with public access in London's MGB.

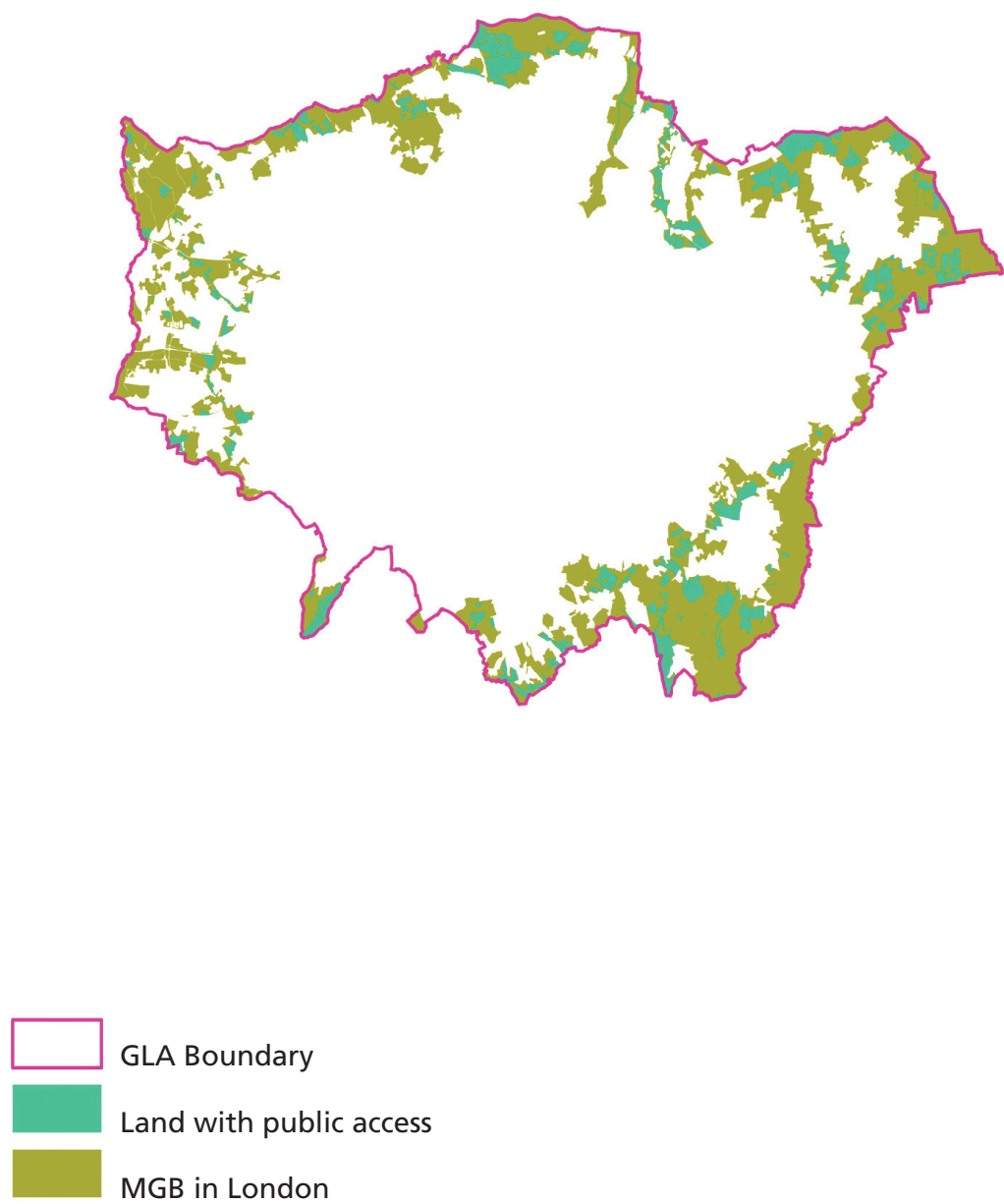
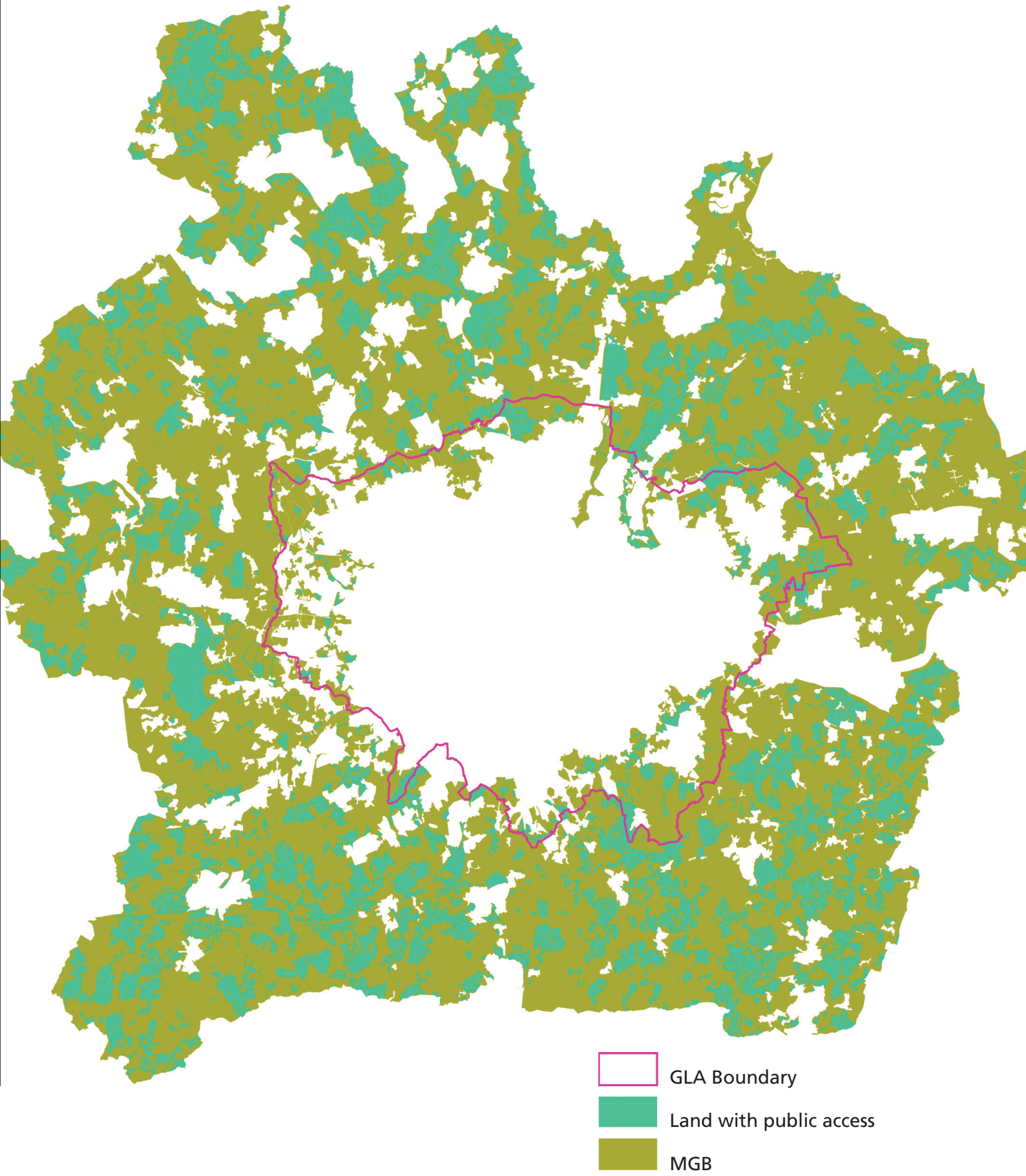
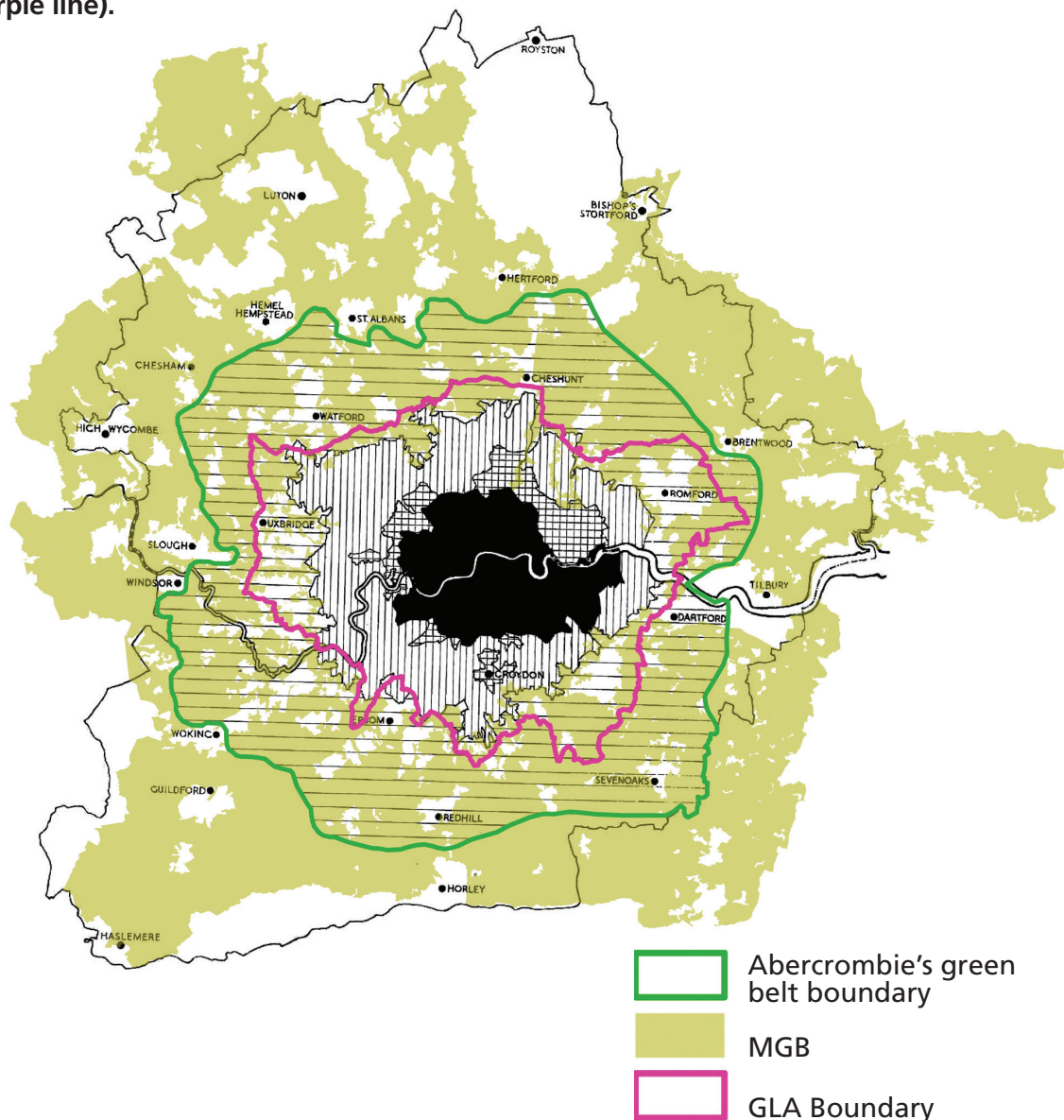


Figure 3: Land with public access in the whole MGB.



The proposed size of the London Green Belt expanded over time, significantly through Abercrombie's 1944 Greater London Plan. This described a greatly extended MGB compared to earlier proposals. As it came to be implemented the MGB continued to grow in size and it now covers a far greater area than even Abercrombie's expanded proposals (Figure 4). Even after the election of Thatcher, nationally, the Green Belt doubled its size²². The MGB now covers 516,000 hectares (5,160sq.km), making it three times bigger than Greater London. It is larger than several countries – a bit bigger than Trinidad and Tobago and about twice the size of Luxembourg.

Figure 4: current MGB (green) overlaid on Abercrombie's 'expanded' Green Belt (purple line).



22 House of Commons Briefing Paper Number 00934, 30 June 2015. "In 1979 the total size of the UK green belt was 721,500 hectares [...] in 1997 the figure for green belt in England was 1,649,640 hectares." P15. However, this is in part due to the official confirmation of some existing Green Belt.

Government guidance states clearly that the current extent of the country's Green Belts is more-or-less set and that any Green Belt should only be increased or reduced in exceptional circumstances, which *can but do not necessarily* include a shortage of land for housing²³ within a plan area²⁴. However, a very recent ruling by the Secretary of State has suggests that Green Belt might have to be taken into consideration more readily if land supply is insufficient²⁵.

There was a postscript to this history of Green Belt expansion and stabilisation during the 1990s, when the notion of the Green Belt as a means of urban containment was echoed by that of 'greenfield' quotas for residential development as a means of promoting urban compaction (in the interest of environmental sustainability). These quotas took a more statistical form than the Green Belt, setting a maximum proportion of residential development in any (plan) area that could be occur on greenfield (as opposed to brownfield) sites. As with Green Belts, 'greenfields' were not defined in terms of land cover or environmental quality, but strictly in terms of whether a site had previously been 'developed' - a concept which for some years after the PPG3 of 2000 (which was the apogee of the policy²⁶), notably included residential gardens. Where this constraint really bit (and housing output was most affected) was in somewhat rural areas beyond the Green Belt. Its effect for the WSE as a whole was thus to compound the restriction on housing supply elasticity initially represented by the Green Belt. The formal policy was relaxed by the 2010 NPPF, though with what actual effect cannot yet be judged.

2.2 Housing in the Wider South East

- The strategic and regional planning link between constraining land (Green Belt) and identifying new sites (New Towns) has long been broken.
- Like the Metropolitan Green Belt, the housing crisis is a Wider South East issue, and not just a London one.

Circumstances have changed dramatically during the life of the MGB. After the Second World War the MGB was designed as an element in a coherent system of state planning. While its constraints fixed a physical limit to London, industrial location controls were supposed to check growth in the wider region, and pressure on London housing was to be relieved through planned dispersal of population and jobs to New Towns beyond the Green Belt. In practice, however, the Green Belt was the only element to be fully realised. Employment growth was increasingly focused on service activities, outside the scope of any effective location policy, leading to substantial uncontrolled growth in the WSE population.

²³ See for example *Hunston Properties Ltd [2013] EWCA Civ 1610*; *[2014] JPL 599, Kay and Ryder LJJ, Sir David Keane*.

²⁴ *Planning Advisory Service/ No5 Chambers. (2014). Plan-Making Case Law Update, Main Issue 4: Green Belt.*
<http://www.pas.gov.uk/documents/332612/6363137/Main+Issue+4+-+Green+Belt+-+PAS+Guidance+-+Case+Law+Update+-+2014.pdf/56737f0c-b16e-4887-aabdd60a42b38f1b>

²⁵ *Appeal decision, 2016, DCS ref 200-004-875. Inspector; K Ellison. Authority; Gloucestershire.*

²⁶ *Under the influence of Lord Rogers' Urban Task Force.*

The New Towns programme never achieved anything like its intended scale. Pressure on space in London was relieved by considerable outward shifts of population and jobs throughout the post-war decades, but even in the heyday of New Town development the vast bulk of these occurred on an uncoordinated basis, within the private housing and land markets, and were subject only to local development control²⁷. Almost all vestiges of the other elements of the intended integrated system of state-planned constraint, development and cross regional balancing have long since gone. Only the MGB has survived, operating at full strength, across a much larger proportion of the WSE, and with the newer greenfield development constraints affecting much of the area beyond that.

In the process, the spatial structures of the economy, the housing/labour markets and travel patterns have become very much more complex, partly as a result of the MGB²⁸. The settlement pattern and that of activity location has become very much more polycentric, generating demands for orbital and eccentric travel which is poorly served by a London-centric public transport network. No strategic plan (even when they existed beyond London) has been able to deal effectively with the challenges this presents.

The region as a whole is both economically dynamic and attractive to international migrants. According to one recent report, the city-region's population of 20 million could increase by 4 million over the next 20 years²⁹. Even within London itself, where the population shrank by almost a quarter during the first 50 years of Green Belt, it has since grown strongly since the late 1980s³⁰ and is projected to reach 10 million by 2036, putting London in the 'mega-city' category³¹. The city alone needs between 49,000 (2015-2036) and 62,000 (2015-2026) more homes every year (the difference between the two numbers depends on the amount of time allowed to clear the current backlog of housing need³²). Nevertheless, the pressing need for more housing affects much of the WSE, independent of London's need.

The interrelated nature of the housing shortage is captured in the following quote: "Outside London, the housing shortfall across the South East, South West and East of England will add up to 91,323 over the next five years [from 2014]. This is before we take into account the added demand that is likely to spill out of the capital over the coming years"³³. Residents and politicians in the authorities surrounding London may want it

27 Buck, N., Gordon, I. and Young,, K. (1986) 'Decentralization in the metropolitan region', ch. 3 in *The London Employment Problem*, Oxford Univ. Press.

28 Gordon, I. (2004). *A disjointed dynamo: The WSE and inter-regional relationships*. *New Economy*, 11 (1), 40-44.

29 AECOM delineate a London City Region by drawing a 90km radius around London giving approximately one-hour travel times by train to the best connection locations at its edge. AECOM. (2015). *Big Bold Global Connected London 2065*. http://www.aecom.com/wp-content/uploads/2015/10/AECOM_Cities_London_2065_Manifesto.pdf

30 GLA Intelligence. (2015). *Population Growth in London, 1939-2015* <https://files.datapress.com/london/dataset/population-change-1939-2015/historical%20population%201939-2015.pdf>

31 GL Hearn. (2015). *Mega Planning: Beyond 2050 – MegaPlan for a MegaCity*. Report. <http://www.thinkcapitareaalestate.uk/media/1250578/megacity-a4.pdf>

32 GLA. (2015). *Further Alterations to the London Plan*, Chapter 3.

33 Savills / Susan Emmett. (2014). *Housing's undersupply is set to continue*. http://www.savills.co.uk/research_articles/141560/176293-0

to manage its own housing need while they manage their own (or free ride on others), but this is unsustainable. People do not stop at political borders when meeting housing needs and finding work. When people can't afford housing in London they move further afield. They will sometimes do so by outbidding existing 'local' residents, making housing unaffordable for the young people of families already living in the 'counties'. Regardless of where the demand is coming from, nearly all the authorities around London are planning to undersupply housing³⁴. In London, sufficient permissions have been granted to meet its housing targets but many permissions do not result in new housing – a reality that is not easily changed³⁵. The housing crisis is not a series of separate crises - a 'London's crisis' and an 'Essex crisis' and a 'Buckinghamshire crisis'. Neither is it likely to be resolved through a series of separate solutions³⁶.

2.3 Adding Metropolitan Green Belt reform to the options

- The housing crisis is complex, with multiple causes and appropriate lines of response.
- All the available lines of remedial action have their limitations if pursued in isolation. Therefore, we need to pursue a multi-pronged approach.
- Re-forming the Metropolitan Green Belt is not an alternative to other necessary lines of action, but enabling a more elastic land supply in the WSE is critical to making other policies effective.

The reasons for the current housing crisis are multiple and complex³⁷, but one important element is the inelastic supply of land for building across the WSE as a whole. The role of the MGB as a constraint on land supply has been recognised at least since the 1970s, in particular by Peter Hall³⁸ and the role of the MGB in this has been the subject of repeated research since then³⁹. This argument does not need repetition here. However, it is also true (and important to say) that this land constraint is not the only cause of the crisis, nor is the MGB the only source of constraint in this region. Neither should building in the MGB be seen as the only (or main) element in a solution to this crisis. So what is the argument for treating Green Belt reform as crucial to achieving a sustainable solution to the WSE's chronic housing supply problem?

34 Emmett, S., (Savills) (2014). 'Housing's undersupply is set to continue'. http://www.savills.co.uk/research_articles/141560/176293-0

35 LSE London Housing in London: Addressing the Supply Crisis. http://www.lse.ac.uk/geographyAndEnvironment/research/london/events/HEIF/HEIF5_14-15/hief5_housing.aspx

36 Holmans, A., (2013). 'New estimates of housing demand and need in England, 2011 to 2031' http://www.tcpa.org.uk/data/files/HousingDemandNeed_TCPA2013.pdf

37 LSE London. (2015). *Housing in London: Addressing the Supply Crisis*. <http://www.lse.ac.uk/geographyAndEnvironment/research/london/docs/LSE-Report-Final-Version-Web-Authored.pdf>

38 Hall, P. (1973). *The Containment of Urban England*. London: PEP.

39 Herington, J. (1990). *Beyond Green Belts: Managing Urban Growth in the 21st Century*. London: Regional Studies Association and Jessica Kingsley Publishers.

A common argument is that the MGB can and should be left out of the portfolio of responses to the housing crisis, because there are enough alternative sources of developable land, and ways of using land more intensively. The work of the Urban Task Force around the turn of the millennia was particularly influential in promoting this view, although it built on previous policy shifts. In 1995, John Gummer as Conservative Secretary of State for the Environment set out in a Green Paper a target for 50% of all new homes to be built on re-used/ brownfield sites⁴⁰. The Urban Task Force report of 1999 reported that 70% of housing was being delivered on brownfield land and called for this to be increased to 75% by 2010. Following the 'compact city' spirit, in 2004, the first London Plan under the new mayoralty sought to make London selfsufficient in meeting projected housing needs. Despite the priority given to ways of securing this goal, repeated in each subsequent round of the Plan, it has never come close to achieving it, or indeed to significantly boosting the rate of construction within London, though it has built up a substantial pipeline of prospective residential sites.

As already noted, the difference between brownfield and greenfield land is not one between old factory sites and open country, but rather depends just on whether land has previously been developed for some purpose (including housing). Almost all London development has long taken place on brownfield sites in these terms, since what else is available tends to be strongly protected, in one way or another. Those who seek to keep the MGB out of the options, commonly argue there is enough brownfield land to meet projected housing need, at least in the short term⁴¹. There has been a strong policy consensus for the past twenty years in favour of developing on urban 'brownfield' sites, rather than on green fields at the city's edge⁴², with a great deal of effort being applied, even before greenfield quotas were brought in. But two things have stood in the way of bringing as much of this into residential development as is required.

One is the sheer complexity and cost of the conversion process, whether this involves shifting existing occupiers, or addressing contamination and access issues, or other mismatches with development capacity⁴³. In the London context, or that of other urban areas within the WSE – unlike that of depressed industrial cities elsewhere – both the economic and political pressures of an overstretched housing market should mean that these are not being taken lightly, especially since the sharp cutback in greenfield development from 2000: and certainly not because anyone believes there is going to be soft or easy Green Belt land available as a substitute in any near future.

Rather, across the region, but especially within London, local policy makers and the market have jointly responded by radically increasing the density of new residential developments – which is the other (sensibly) recommended alternative to grasping for greenfield sites.

40 Department of the Environment, *Our Future Homes*, 1995.

41 Sinnett, D., Carmichael, L., Williams, K. and Miner, P. (2014). *From wasted space to living spaces: The availability of brownfield land for housing development in England*. Technical Report. Campaign to Protect Rural England. <http://eprints.uwe.ac.uk/24995>

42 CPRE. (2009). *Brownfield Market Signals*. http://www.rudi.net/files/paper/optional_file/1brownfield-market-signals.pdf

43 Sinnett, D., Carmichael, L., Williams, K. and Miner, P. (2014) *From wasted space to living spaces: The availability of brownfield land for housing development in England*. Technical Report. Campaign to Protect Rural England. <http://eprints.uwe.ac.uk/24995>

The fact that, even in the case of London, this has not actually produced more housing (before or after the financial crisis) reflects the second and main thing which stands in the way of mobilising brownfield sites to resolve the immediate housing problem. In the context of a region where strong economic growth is expected over the long term, but the land supply is inelastic – and much more so since tight greenfield quotas were introduced – it is not economically rational to bring all available sites into development at the same speed⁴⁴. This will be especially true if acceptance of higher densities allows output to be sustained with smaller commitments of land, and where there is an assurance that sites will retain their attractiveness, and where the costs of remediation/access etc. become more acceptable over the long run. In the long term, obstacles to bringing most potential brownfield sites (in this region) into housing use or intensified housing use may be manageable. In the shorter/medium term, even with further intensified efforts, sufficient residential development is extremely unlikely to be achieved on brownfield sites in this region. This is largely *because of*, rather than *despite*, policy constraints in the use of other sites, within the MGB or beyond it. From this perspective then, an important argument for some kind of change in the Green Belt is actually to encourage the active development of other kinds of site, and discourage speculative land-hoarding.

This argument may apply with less force to some other evidently worthwhile lines of action, where existing efforts could be intensified, though with an expectation of increasing difficulty as they are scaled up. Thus, while there are important contributions to be made through, for example, densification, including in the suburbs, these are not enough⁴⁵. These are not simply alternative options, but complementary elements in the battery of actions that will be needed to close the housing supply gap across the WSE⁴⁶. It is not, however, simply a matter of adding up the contributions that can be expected from each of these over a period of five or ten years of crisis activity. For them all to be forthcoming on the appropriate scale, in a context which is not simply subject to state direction, there will have to be a reasonable expectation for the longer run that the region will have a sufficiently elastic supply of housing land to make delays in development economically unattractive. From that perspective, it makes no sense to rule out re-thinking the MGB's role, as a significant component in any sustainable solution.

44 Gordon, I., Mace, A. and Whitehead, C. (forthcoming) *Defining and implementing density standards in the Plan*, London Planning Density Report 1, GLA.

45 Quod/Shelter. 2016. *When Brownfield isn't Enough; Strategic Options for London's Growth*. http://england.shelter.org.uk/_data/assets/pdf_file/0003/1239330/2016_02_29_When_Brownfield_isnt_enough.pdf

46 As the (last) Mayor's Outer London Commission argued in its final report: *Outer London Commission (March 2016) Seventh Report: Accommodating London's Growth*, London: GLA. https://www.london.gov.uk/sites/default/files/olc_accommodating_growth_main_report_fixed.pdf

3. The Purpose and Value of the Metropolitan Green Belt



- The purposes of the MGB are confused and this inhibits open discussion of the problems and possibilities.
- It is necessary to look together at the primary reason for the MGB and secondary ambitions.
- The Green Belt has become a ‘first among equals’ planning policy, and this can lead to poor planning.

The MGB presents a contrast between its practical character as an unusually blunt planning policy, attracting polarised but mostly very positive judgements about its value, and a substantial lack of clarity, within the general public at least, about what particular purposes it is meant to serve, and its effectiveness in securing these. Ambiguities about its goals are probably helpful in buttressing its durability and reducing uncertainties about its enforcement. But in a context where the status quo has become evidently dysfunctional in terms of housing affordability across the WSE, they reduce debate to generalised pro/anti MGB positions, and close down discussion of alternatives, including reforms that might deliver both on the really valued aspects of Green Belts and on significantly better housing prospects for residents in the region. The recent 2016 mayoral race in London typifies the tendency to polarisation, where candidates were unanimous in declaring their straightforward support for the London Green Belt (at least), with no debate countenanced as to any kind of change in this situation. However, while the short-term demands of campaigning favour a clear and unambiguous position on the MGB, the longterm nature of the housing crisis requires a more discriminating approach. At the very least it should be evident that an institution designed 70-80 years ago, and which has been in pretty much its current form for some 60 years is unlikely to be ideal for present circumstances. Maybe it should be bigger, or with more resources devoted to securing the greenness and/or accessibility of larger tracts if it has a different kind of status. A reasoned debate, and careful examination of such possibilities, is surely overdue – as with any other collective institution of its vintage, however generally valued – even without the dire situation which has built up in relation to housing supply.

Much attention was paid throughout the workshops to the need for greater clarity as to what the MGB is and does and what we want it to be and to do. We noted in 2.1 that the aim of the MGB, to restrict city growth, is often confused with the means – maintaining expanses of open land. There is a pressing need to look at both to achieve greater clarity of purpose. We must focus on the confusion between the primary purpose of the MGB, to limit city growth, and the incidental outcome of the policy as it has been applied – lots of open land. If, collectively, we simply wanted to tightly define a city or to stop settlements merging, then a policy of strategic gaps would be just as useful. The alternative name is significant as it emphasises that to achieve the purpose, the amount of land could be quite narrow – certainly nothing like the scale of the present MGB.

In addressing these issues, we need also to attend to what the public (and communities in the region) understand to be the key purposes and values of the MGB, which may well be substantially different from those prioritised in government statements, such as the NPPF, and what those would imply about desirable as well as undesirable directions for change.

3.1 Openness

A strategic gap helps distinguish between the aim of tightly defined cities and openness. Openness is not essential to the purposes of defining and separating settlements. However, the separate purpose of openness is raised in the NPPF. The Government is specific in stating that a 'fundamental aim' of Green Belt is that it keeps land 'permanently open'⁴⁷. The idea of permanence was more flexibly defined in earlier guidance: "When local planning authorities prepare new or revised structure and local plans, any proposals affecting Green Belts should be related to a time-scale which is longer than that normally adopted for other aspects of the plan"⁴⁸. Openness is an aesthetic consideration; some people simply prefer open countryside to buildings. It is also a matter of degree, how much openness do we retain? This leads to two options, one that achieves the aesthetic preference for the countryside and one that doesn't. First, and at the extreme would be 'Green Belt Britain'. We could freeze the present town and country allocation in the UK. This would clearly have huge costs in terms of housing our population but would satisfy the most extreme town and country aesthetic. Or, second, we could compromise some openness by building on some greenfield sites, which is the current policy position. We do not currently seek to prevent all loss of 'openness', rather, we seek to prevent loss of openness in some places – most particularly within Green Belt. Openness achieved in this way generates strong vested interests as the MGB acts as a guarantor of 'permanent' openness in some locations, which is built into the value of a property.

3.2 Urban regeneration

Limiting building on greenfield sites to locations away from cities could also be justified by the fifth purpose in the NPPF; 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.' This is a significant addition that first appeared in 1984. If we want to promote urban regeneration by preventing the use of greenfield land, then the use of a wide MGB is one way of achieving this. It was noted throughout the project, however, that there is scant evidence that this aim is achieved by the MGB. It had, after all been in existence in pretty much its present form for several decades before a growing need for regeneration made this an additional purpose. Because the actual policy has not changed since then, it is very hard to know what impact it actually has in this regard. However, it has been noted that after a tight greenfield quota was imposed (affecting areas beyond Green Belts), an increase in housing on brownfield land was achieved solely by much denser development, not by the regeneration of more urban land. Indeed the reuse of vacant/industrial sites actually fell off substantially, though more residential land was recycled. In London, where there is scarcely any greenfield development, the flow of land into actual residential development was

47 NPPF para 79

48 DCLG. (1995). *Planning Policy Guidance 2 1995 amended 2001*: 2.12

substantially reduced⁴⁹. Across the WSE as a whole the clear effect has been of a marked reduction in house-building. Even if in the Green Belt case a more complete bar on development did actually assist regeneration of urban brownfield areas, this would have been at the cost of the overall availability and affordability of housing.

3.3 Access and environmental quality

As objectives, openness and promoting regeneration both imply a wide MGB rather than a focused strategic gap. Openness and encouraging regeneration can both be achieved regardless of the quality of the land in the MGB. A ring of scrubland, intensive agriculture or golf courses could all separate off town and country and offer openness. There need be no access to the MGB at all for it to carry out its containment purpose. But government policy seeks a supplementary justification for all Green Belt that focuses on its environmental quality and public access.

Those seeking to challenge the existing policy frequently focus on the quality/ access issue. Typically, that the Green Belt is the site of intensive agriculture providing little in the way of biodiversity or is occupied by golf courses (7.1% of the MGB within London⁵⁰). The problem with this focus is that advocates can shift between justifications:

- by ignoring quality and stressing the primary purpose to serve as a barrier, access and land quality is incidental, or,
- by focusing on openness – this in an ‘unarguable’ preference and does not require access or land quality.
- Alternatively, and significantly, by reframing the quality argument, emphasising that development in the Green Belt permanently removes the possibility of improvement, e.g. turning from intensive to sustainable food production.

There is the danger of advocates having it all ways by arguing that the quality of land doesn’t matter because containment is the purpose, but at the same time justifying the cost of containment on a future promise of access and environmental quality. In this way the ‘cost’ of any development of the MGB is artificially inflated. Not only does it involve the loss of openness now, but also the promise of environmental improvement and accessibility in the future. Therefore, we believe it is important to keep the link between the primary and incidental purposes of the Green Belt when discussing its costs and benefits.

49 Gordon, I., Mace, A. and Whitehead, C. (forthcoming) *Defining and implementing density standards in the Plan*, London Planning Density Report 1, GLA.

50 London First., Quod., & SERC. (2015). *The Green Belt: A Place for Londoners?*
<http://londonfirst.co.uk/wp-content/uploads/2015/02/Green-Belt-Report-February-2015.pdf>

3.4 Compactness of Urban Form

The urban containment agenda of which the MGB was originally an intrinsic part was succeeded in the 1990s by a compact city (or possibly city-region) agenda, much in the same spirit of resisting 'sprawl', but including a more explicitly environmental purpose of avoiding excessive use of the private car for personal travel. Green Belt is often seen as a means to that end also, though the 1973 Containment of Urban England study found otherwise. In fact now, as then, the MGB serves more to spread development out than to keep it in.. While it has been successful at stopping the physical growth of towns and cities into the immediately surrounding countryside, development has taken place beyond the MGB. Leapfrogging of the Green Belt (like overspill from a levee) leads, at least initially, to longer commutes by movers⁵¹, although in the long-run most of those who move out find jobs closer to their new homes⁵².

Longer commuter journeys are not desirable in environmental or personal terms, but even when these are replaced, the fact that the Green Belt pushes residents further out from the city (increasingly far now, as other planning constraints bite in areas beyond the MGB) means that it takes place at lower densities, with more spread out settlement patterns and the generation of more car travel, than if it had been permitted at locations within the MGB.

3.5 Public Evaluations of Green Belt

Widespread public support for the Green Belts, including the MGB, as an idea and an institution, together with fear that any change would mean 'developers concreting over the home counties', has been very evident – and an important factor in closing down any serious political debate about change. Quite what underlies this – in terms of which of the purposes are most highly valued and understood as being effectively secured – is much less clear, however. So, also is what are actually recognised as being the opportunity costs of the present Green Belt, and where these may differ from the research evidence. These are clearly crucial, however, both because what is highly valued should have the most bearing on the direction of future policy, and because positive change will require a substantial consensus to be built and mobilised among WSE residents and their representatives.

Evidence about this has been limited until quite recently, but some is now available both about which purposes are more clearly valued, and about how conditional support may

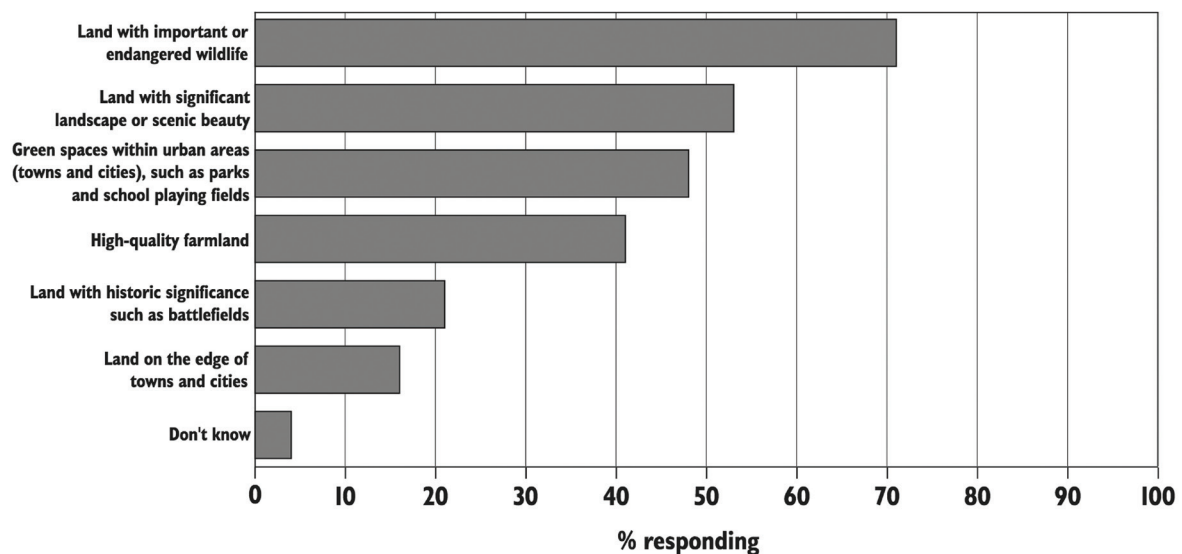
51 As the Campaign to Protect Rural England, a generally strong advocate for Green Belt has accepted: Where employment is not available near to where people live, they state that: "... commuting from beyond the Green Belt can be sustainable if there are fast public transport links available." CPRE. (2015). Green Belt Myths. <http://www.cpre.org.uk/what-we-do/housing-and-planning/green-belts/in-depth/item/3027-green-belt-myths#myth7>

52 Papworth, T. (2015). The Green Noose - an analysis of Green Belts and proposals for reform. London: Adam Smith Institute.

be. On valuing purposes, a key source is a MORI poll asking a general question about the importance of protecting different types of land (without specific and potentially leading reference to Green Belt), which shows strong support, of 48-70%, for various 'green features', commonly associated with the MGB - but very much less for protection of land at the edge of towns, i.e. for 'belts', at just 15% (Figure 5).

Figure 5: Public Opinion Poll Evidence 'what types of land is it most important to protect from development? (Note: interviewees could select up to three categories and so figures do not add up to 100 per cent)

Source: Barker Review, chart 2.3/ Ipsos MORI⁵³



On the second question, there is some evidence that the public recognises the link between protecting open land and impact on the supply of affordable housing and is prepared to trade-off some protection of land around cities for more housing. A Natural England survey in 2009 asked about the need to develop undeveloped land. In response to the statement, 'Protecting the countryside around England's large towns and cities prevents affordable housing from being built', 35% agreed, 24% were neutral and 41% disagreed. In response to the statement, 'While most of the countryside around England's towns and cities should be protected, some could be used for new housing and other development' 47% agreed, 23% were neutral and only 30% disagreed⁵⁴.

⁵³ From Barker, K. (2004) *Review of Housing Supply: Delivering Stability: Securing our Future Housing Needs. Final Report & Recommendations*. London: TSO/H M Treasury, p. 60.

⁵⁴ Natural England survey, July and August 2009, 1754 interviews. Table 4. <http://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/1954-a-natural-englandsurvey-into-public-attitudes-towards-the-green-belt>

There is evidence from more recent British Social Attitudes Surveys that views about these priorities have been changing quite sharply. The question here was about whether people supported or opposed more houses in their local area. In 2010, 28% of those in the WSE as a whole supported more local housing, while 49% opposed it; by 2014, however, the balance was reversed with 55% supporting and 24% opposing. The shift was a bit higher among Outer London residents, but even among those in parts of the WSE outside London it was very strong, with 48% coming to support more local housing by 2014, against 24% opposing it.

Though an indicator of one kind of professional opinion, rather than that of the public, we also noted that in a New London Architecture 'charette' in February 2016 – a grouping more naturally associated with 'compact city' policies – 74% of participants voted for the Mayor to undertake a strategic review of the London Green Belt, against 10% with a more radical and 17% a more conservative view as to what should be done.

3.6 First among equals as a planning policy ?

Throughout the workshops participants noted that, while the MGB is only one planning policy among many, it has a very special status. This emerges from the relatively unambiguous terms of the policy, leading to it being upheld in the courts over many years. British planning rests on the weighing of different evidence and arguments and Green Belt is given great weight. The status of this policy as 'first among equals' was seen as leading to bad planning by many participants in the project. It is often possible to replace an existing building in the MGB but it does not follow that this is the best part of the MGB in which to locate the new development. We were introduced to one example where a school was being developed on site in the MGB and where the existence of an earlier building had facilitated the decision.

However, the site had poor public transport links and is likely to generate a lot of car journeys. In the same authority we also saw sites where there was demand for warehousing near to a motorway junction. Given the presence of the motorway, the site had little public benefit in terms of openness and would not threaten the other purposes of the MGB. A much-cited example of inefficient planning created by the MGB is the inability to develop housing near to railway stations where these are in the MGB. We look at this in more detail in the next section.

4. Options



- There are a variety of ways in which the general bar on residential development anywhere within the established MGB might be modified in the interests of releasing the inflationary pressure on house prices within the WSE – some more opportunistic while others are more planned.
- A starting point for work on re-shaping the MGB for the 21st century is to identify the range of alternatives available and compare how they relate to a set of desirable criteria.

Over the last couple of years growing discussion about the MGB, and its relation to a more acute housing supply problem across the WSE, has involved a range of different ideas about how changing it could at least mitigate this problem. These ideas involve a number of different *kinds* of action that vary: first in spatial form, in the balance between strategic ambition and more pragmatic opportunism; second, in the likely time profile of action; and third, in their potential scale. Such distinct option types are very likely to have different sorts of impact, overall, on the MGB, including on those features we most value. These are separable from the impacts of any particular scheme or plan. In our judgement, therefore, it is important now to start looking across the board at how different types of approach ‘score’ in terms of their profiles of likely strengths and weaknesses across a set of evaluative criteria. What we have learned about these from the project is summarised here in relation to six main types of action (in one case, arguably, inaction) that have been suggested:

1. No formal policy or coverage change, but an increasing trend to approval of housing development within the MGB (*applications & appeals*)
2. Piecemeal, incremental change through local reviews of coverage, formalised through development plans (*local review*)
3. A general policy change removing protection from MGB areas in close proximity to significant public transport nodes (*opening up ped-sheds*)
4. A policy shift favouring certain kinds of significant and sustainably planned developments, such as garden cities, in appropriate locations within the MGB (*model settlements*)
5. A strategic re-shaping of the MGB, removing some selected areas from coverage, while maintaining current controls over the rest and enhancing its green-ness (*growth/green wedges or corridors*);
6. Wholesale removal of protection from those areas within the MGB not covered by other forms of environmental designation, or conservation policies in the local development plan (*de-regulation*).

Discussion of these different routes through which change in the Green Belt may be brought about ought to be carried out on a comparative basis, in relation to a set of clear criteria. Six such broad criteria have emerged during the course of this project that we think deserve explicit attention, covering for each approach:

- I. Its potential contribution (direct and indirect) to relieving housing supply and affordability problems across the WSE;

- II. The likelihood, in the process, of avoiding substantial negative effects (in the short and long term) on the natural environment, in aesthetic, ecological and recreational terms
- III. Predictable environmental impacts from the travel patterns of residents in the specific type of MGB development, relative to other approaches, and to probable alternative locations for residential expansion in the absence of changes to the MGB
- IV. Indirect impacts on the (actual or perceived) likelihood of encouraging further erosion of Green Belt protection, in areas and cases beyond those explicitly covered by a policy and regulatory change
- V. The likelihood of de-restriction in being accompanied by substantial compensating advantages for nearby residents, encouraging a more supportive attitude to the change
- VI. Its potential to contribute to more coherent/sustainable long term patterns of development across the WSE.

4.1 No Policy Change alongside Applications & Appeals

This is arguably the status quo, since while Green Belt as a planning policy carries great weight and has been strongly enforced, change nevertheless occurs, including (a possibly increasing amount of) new development. Recent research by CPRE local groups claims that nationally over a quarter million homes are being planned within Green Belt (within adopted or draft plans). Over 40% of these were said to be in the MGB, where there had been a tripling of proposed 'Green Belt' homes since August 2013, rising to some 117,000⁵⁵. Though we cannot verify these figures, conversion of such planned numbers into approved developments could be expected to depend on Green Belt reviews, rather than simply ad hoc permissions. Across the country as a whole, the number of residential units on Green Belt sites receiving full approval had shown a rapid proportionate increase (quintupling over five years), but was still just 12 thousand in 2014/5. The upward trend was sharper outside the WSE regions, in which the evidence of an upward drift is unclear (in data up to 2013/4)⁵⁶.

Within London, the new Mayor has announced a tougher, zero-tolerance approach to approval of Green Belt development applications, although it is still reasonable to expect that, in the absence of any formal MGB reform, sheer pressure of demand will lead to some more accommodation of exceptional schemes. Despite the CPRE claims, it seems unlikely that this would be on a scale that would make any significant impact on overall

55 Siddique, H. (2016). *New homes eroding green belt 'at fastest rate for 20 years'*. *The Guardian*. <http://www.theguardian.com/society/2016/apr/25/number-of-green-belt-homesplanned-up-200000-in-four-years>.

56 *Figures From Glenigan (2015) Green Belt Under Development : a special report with updating of the national for a 2016 BBC programme, cited in Louise Smith (2016) Green Belt: Briefing Paper 00934, House of Commons Library.*

housing supply. Additionally, though the general environmental quality/impact of the schemes cannot be judged, in several terms this de facto channel seems one of the least advantageous. Specifically, by occurring in the face of a policy which both nominally and historically has been very strict, an increase in this type of development is liable to be most subversive of valued notions about the durability of MGB protection. Since acceptable 'exceptional' dwellings are likely to be those presented as 'low impact', typically implying very low densities, their positive impact on both housing supply⁵⁷ and sustainable travel patterns, per hectare of Green Belt sacrificed, is also likely to be much more limited than with policy-induced development. Compensating advantages for other local residents are also unlikely to be significant, unless forced in particular cases as a condition for gaining permission and, by definition this form of incremental change can make no strategic contribution to the pattern of development.

4.2 Coverage Review and Incremental Change

Despite strong ministerial claims about permanence, governments themselves have proposed ad hoc changes from time to time in how policy is applied within the Green Belts. Two examples from the past year are consultations on easing approval for replacement buildings which are larger than their predecessors, and on permitting starter homes on brownfield sites within the Green Belt⁵⁸. In the latter case, the logic was that previous use represented a sufficient case for exception - even though, potentially, the land could have been restored. The argument was also specific to a particular government initiative, which would yield rather dense development, but behind it was recognition of the salience of the scale of need for additional and affordable housing.

This balancing of the need for more homes against retaining all existing Green Belt is more generally reflected in the possibility given to local authorities to review existing Green Belt when planning for housing land. They assess future housing demand (through a Strategic Housing Market Assessment) and the land available (through a Strategic Housing Land Availability Assessment). Where there is not enough land available to meet anticipated demand, Green Belt land can be considered and local authorities can carry out a Green Belt Review. There is no standard methodology for doing this but each has to apply the five criteria set out in the NPPF. Ultimately, whether circumstances are sufficiently exceptional to permit change in coverage of the Green Belt can be tested through the courts.

Current change is largely uncoordinated as it arises from individual local authority reviews with no standard methodology, appeal hearings in the courts that weigh individual circumstances, and the government making multiple individual changes

57 DCLG English GB statistics for 2000-11 indicate that 5.4% of the land passing to residential use was in GB areas, but only 2.4% of new dwellings (i.e. about 3,500 p.a.). Publication of this series was interrupted thereafter. But a new data series for 2013-5 (on a quite different basis) indicates a similar density differential, with Green Belt sites accounting for 8% of land transferred to residential use and 3% of new addresses.

58 DCLG. (2015). Consultation on proposed changes to national planning policy. Report. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/488276/151207_Consultation_document.pdf

to planning policy. The resulting piecemeal development in the MGB was a concern raised throughout the project and reflected in a recent GLA planning committee meeting⁵⁹. This form of development can only feed into the public concern leading people to ask 'where it will end' as they cannot see what is planned for the future. A basic choice is between piecemeal or strategically planned development in the MGB, though a recommendation in the last Outer London Commission report⁶⁰ that the Mayor should lead a 'strategic review' for the London Green Belt, and possibly contribute to another co-ordinated review in the rest of the MGB, seems to represent a kind of halfway house.

Even with such leadership, most of the weaknesses of the 'applications and appeals' model still seem to apply, albeit in weaker form – this would depend on how any strategic/mayoral intervention were managed. It could lead to the MGB in London making a greater contribution to relieving the dearth of housing supply, but this potential could be restricted by review procedures which are not supposed to be addressing a structural land supply problem (i.e. the NPPF indicates that the Government expects no substantial change in the Green Belt), and by the need to manage the politics of relations between the GLA and boroughs.

4.3 'Ped-shed' opportunities

Among systematic kinds of planning approach that have been proposed to identify appropriate areas for release from Green Belt controls, one general type works straightforwardly from public transport accessibility criteria. Specifically, it is proposed that areas within walking distance of a station ('ped-sheds') could suitably be freed from Green Belt constraints. In different versions of this idea the arguments in support of it include a positive effect on travel sustainability, the already compromised rurality of such sites, and the likelihood that they could be developed on a more intensive (i.e. land-saving) basis than elsewhere. As with other modifications of Green Belt coverage, specifically environmental designations would still apply, as would the protection of normal development control procedures. Such an approach might depend upon the planning authority proposing a change of status, backed by an enabling provision, or there could simply be a general adjustment to the effective coverage of the MGB, maybe via amendment to the NPPF.

The NPPF indicates that under certain conditions a series of uses are 'not inappropriate' in the Green Belt (section 90) and elsewhere allows the possibility of land uses where 'very special circumstances' can be shown (section 91). There is at least the possibility of allowing for exceptional circumstances in ped-sheds.

Several reports have now made such proposals, with varying coverage, and indicated how much land and development potential could be released from the many cases identified, where there is substantial undeveloped land within such ped-sheds. One example, from AECOM, covering a large part of the WSE, mapped a lot of such sites, including quite a large number inside the MGB (Figure 6). Within London and immediately adjoining areas,

59 GLA Planning Committee. (2016). Transcript of Item 5 Strategic Policy Issues and Arrangements: London and the Wider South East. 10 March.

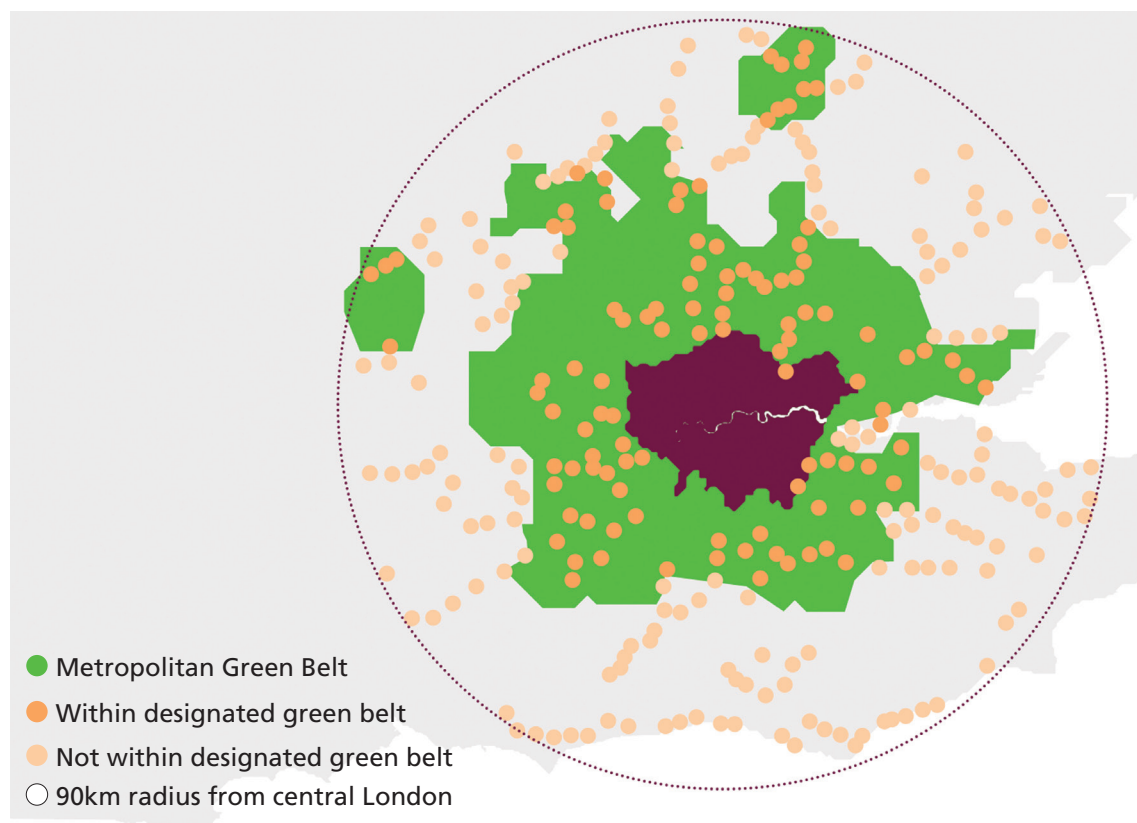
60 Repeat of reference to OLC 7th Report.

Barney Stringer has applied a more detailed approach, explicitly excluding land where other forms of protection would still bar development (Figure 7). Using an 800 metre radius for the ped-shed, and realistically assuming that 60% of the otherwise unconstrained area might be developable, he estimates that approaching some 20k ha of land would be available, on which Paul Cheshire estimates that a million or so houses could be built⁶¹ (or twice as many if the radius were extended to 2km). More recently, Tom Papworth has identified MGB sites with development potential where proximity to an Underground station might also justify development⁶².

In practice, as has been pointed out, there are a range of other reasons why development might not be feasible or acceptable within some of these notional 'sites', but the potential still seems very large.

Figure 6: Undeveloped station catchments outside Greater London in the 'Wider South East'.

Source: AECOM 2016:21



61 Barney's blog (2014). *Is the Green Belt sustainable?*
<https://barneystringer.wordpress.com/2014/06/17/is-the-green-belt-sustainable/>

62 Papworth, T. (2016). 'A garden of one's own. Suggestions for development in the metropolitan Green Belt.' Briefing Paper
<http://static1.squarespace.com/static/56edde762cd9413e151ac92/56fa8e425bd3306c4a738644/56fa8faa5bd3306c4a73c9ed/1459261354271/A-Garden-of-Ones-Own.pdf?format=original>

Figure 7: MGB within 800 metres of an existing Tube, tram or train station excluding other designations eg Areas of Outstanding Natural Beauty, SSSI, ancient woodland.

Source: <https://barneystringer.wordpress.com/2014/06/17/is-the-green-belt-sustainable/>



Of the 'planned' approaches toward development of some parts of the MGB, this is the least strategic, with both more and fewer positive implications following from this. It is the most straightforward, requiring a single policy decision to set it in motion, with implementation following incrementally, basically through interaction between developers/market judgements and normal local planning controls. Its long run significance for increasing the elasticity of land supply would rapidly become evident, with less uncertainty than if this hinged on particular development schemes, infrastructure schemes and continuity in national policy. In its simplest form, there is also a credible spatial fairness to this, not discriminating between areas except in relation to existence of rail connections. On several criteria, this model seems to score rather better than the two previous options.

However, relative to more strategic schemes, there are also apparently significant limitations. Not all of the rail connections are equally good in terms of their ability to divert travel demands from new residents on to non-car modes. To help achieve this, there would need to be a sufficient quantum and density of development to support local services. Then, where there is no significant enhancement of the existing rail service, the scope for offering important side-benefits to existing residents, or countryside users seem modest. In more ambitious versions, development in ped-sheds could be linked to prospective services and stations (as possible deals), rather than simply capitalising on

existing ones. In this respect, lessons might still be learned from Crossrail One (The Elizabeth Line) for Crossrail Two. However, as we discovered through the project, linking new transport infrastructure to new housing is not always simple. In the case of Crossrail Two relieving network congestion in south-west London is a sufficient condition without providing substantial additional housing and it outweighs the benefits of achieving greater housing stock by amending the route or location of stations.

For better and for worse (on different criteria), the ped-shed kind of approach to selectively releasing MGB land would leave the overall form and extent of the Green Belt unchanged, simply modestly enlarging the urban punctuations within it. The stakes are relatively modest, and this kind of initiative (on its own) would do something toward any strategic re-shaping of patterns of development toward a more polycentric but coherent 21st century, post-Abercrombie pattern of development for the WSE.

4.4 Urban extension and new garden settlements

Other approaches involving active planned development within the MGB are intentionally rather more strategic, and bolder^{63 64}. One version adapts and reapplies a valued planning model from past proposals and actions in this region, with creation of some more substantial planned communities. These are analogous in form at least (spatially and maybe institutionally) to new/ expanded towns, but within rather than beyond the MGB, and hence with less emphasis on self-containment. In particular we also looked at proposals for Garden Cities of the kind long advocated by the Town & Country Planning Association, which continues to produce advice on principles and practice for this kind of balanced settlement development⁶⁵.

A detailed proposal has been worked up by URBED, whose winning competition entry for 'Uxchester', though not actually for a WSE location, included details of financing as well as of internal structure. They deemed the possibility of entirely new stand-alone garden cities as financially prohibitive in infrastructural terms, focusing instead on applying garden city principles to urban extensions which could exploit existing (and likely additional) communications links and higher level services. Whether in the form of actual extensions or of distinct but proximate settlements, this is an approach which holds promise within the MGB. In the garden city tradition, it is linked with an ambitious model for managing land, development and financing. This would be enabled by larger scale development in situations where public or public/private organisations can take the initiative in acquisition and controlling land and in development management.

These are not necessary features of a new settlement approach to the spatial planning of some concentrated development within the MGB, but they do have powerful

63 AECOM. (2015). *Big Bold Global Connected London 2065*.

http://www.aecom.com/wp-content/uploads/2015/10/AECOM_Cities_London_2065_Manifesto.pdf

64 GL Hearn. (2015) *Mega Planning: Beyond 2050 – MegaPlan for a MegaCity*. Report.

65 TCPA (2014) *The TCPA Garden City Principles*

http://www.tcpa.org.uk/data/files/TCPA_Garden_City_Principles_Note_20140411.pdf

potential in relation to securing external benefits (and minimising negative impacts) for existing communities, and contemporary re-workings of the Garden City institutional model, such as those by URBED, which can offer useful lessons. Additionally this kind of approach is better⁶⁶ suited to achieving higher density developments (minimising land take) and also probably, if suitably located, to achieving switches to sustainable transport modes – as well as for incorporation in a re-shaping of the region's spatial development.

A significant limitation of this approach, pursued as an idea on its own, is its dependence upon specific initiatives, and the indeterminacy of how much it would contribute to supporting additional housing development across the region, directly or indirectly. Indeed, there is unlikely to be any significant indirect effect, in terms of signalling to the market that additional land supply will be forthcoming in response to future demand growth – as is required in order to discourage hoarding of brownfield or other land. In that specific respect it has less salience than the ped-shed approach and, if pursued on a one-off basis, as is likely unless a national policy initiative were to come along, the potential of new planned settlements to contribute to positive restructuring of the WSE settlement and communications pattern is pretty uncertain.

4.5 Green Wedges and Coordination Corridors

The third of the planned approaches on offer involves some variation of the green wedge idea, which has been canvassed on various occasions since some kind of planned 'green' area outside the city was seriously considered during the last century. Given the existence of the MGB, it would involve some kind of surgery (or maybe topiary) on the form of the belt, excising some areas from it, probably in the form of a limited number of corridors, while securing the boundaries of the 'wedges' in between – and enhancing their effectiveness in service of truly 'green' objectives (aesthetic, ecological and recreational), not simply boundary marking. As we understand the idea, this should be designed as another very long term ('once and for all' or 'once in several generations') restructuring', withdrawing a relatively small fraction of the very large MGB area and seeking to maximise the 'green' value of the rest, and thus of the present green belt as a whole.

Current / recent proposals for this type of restructuring are characterised as coordination corridors, following the lines of those identified in the Key Diagram of successive Mayoral Plans, and the last – the Mayor's (non-statutory) long term infrastructure plan. These are articulated around the main transport routes in and out of London, which also relate to substantial economically important (and mostly dynamic) centres further out in the WSE, along all points of the compass. Although, these corridors are conceived of partly as making a significant contribution to additional housing development, as, for example, in the recent OLC report on strategic growth options, and naturally pass through significant parts of the MGB, the intention is not simply to secure Green Belt land for housing.

66 URBED (2014). *Uxchester Garden City*.

<http://urbed.coop/sites/default/files/URBED%20Wolfson%20Entry%20low%20res.pdf>

Even in our context, where we are starting off from the issue of how the MGB can be re-formed, it should be emphasised that the purpose of pursuing a corridors/wedges approach is not to get continuous chains of 'ribbon development' in the former. Rather the corridor option involves the possibility of planning a series of larger development centres (or clusters of smaller ones) along public transport links within the corridor. Nor is it intended that corridors should be London-centred, though rapid access into and out of the centre would be a major factor, for a variety of purposes. Developing centres around railway stations, for example, does not assume that the bulk of residents would actually commute into London, since there would be growing opportunities inside the corridor as well as in other dynamic centres using other cross-cutting transport links that do not feed into London.

Not all development need be housing. New housing would generate demand for some 'immediate' commercial uses such as shops and services for new residents, and the corridors could and should become more competitive and attractive locations for capital-region commercial functions, including some currently located more centrally. London is already seeing a significant transfer of commercial space into housing use, with some concern over longterm economic implications. In relation to the corridors in particular, the Outer London Commission in its strategic options report suggested there may be a case for trading off a greater level of housing within London for more commercial uses outside⁶⁷.

To deliver on the ground, corridors would need to provoke modifications to (or exemption from) NPPF procedures, as Green Belt policy is highly centralised. In any form, the logic of this corridor approach is that it should lead to some significant revisions of national policy. This could simply be by allowing local authorities within a designated corridor the same flexibility to de-designate parts of the MGB as they have previously enjoyed in getting areas added. There would be a need for real collaboration among authorities within a corridor, and more certainty would be offered, by more surgical removal of areas from the scope of the MGB, relying for protection of sensitive sites on the conventional range of environmental designations (AONB, SSSI etc.) and appropriate local planning.

Like the new settlements approach the corridors/wedges option is not a simple off the peg solution, with predictable developmental prospects following a single policy change, as the ped-sheds one might be. This reflects both the fact that it is multi-purpose, and that implementation depends heavily on a co-operation among local authorities, interacting with other agencies, including regional transport providers. If successfully carried through, it could and should offer a substantially increased elasticity of land supply over the long turn (which we have argued to be crucial), without the prospect of a 'slippery slope' of incremental development eating into parts of, what would become, the green wedges still covering the bulk of the metropolitan region. Unlike the other options so far considered, it also has a clearly strategic dimension to it, in relation to development of the future spatial structure of a polycentric WSE. In addition, it *can* naturally have built into it, a set of deals, in relation to balance of development types, infrastructure packages, re-greening of the wedges etc., thus substantially enhancing prospects of acceptability across the region. Its main limitation, reflecting its strengths,

67 Outer London Commission. (2016). *Seventh Report: accommodating London's growth*. https://www.london.gov.uk/sites/default/files/olc_accommodating_growth_main_report_fixed.pdf

is that it is developmental in character, and has to be made to work in practice, through inter-local and inter-agency and inter-level collaboration.

4.6 De-designation

Finally, there is the (conceptually) simplest, Big Bang option. Some opponents would prefer to see the complete removal of Green Belt policy precisely because it would send the strongest possible signal of an intention to ease the constraint on land supply and therefore suppress housing price inflation. This market led approach allows for the retention of other existing designations such as SSSI and AONB and even for the limited allocation of new protections were Green Belt policy to be ended. The driving logic is that in the absence of the Green Belt, price signals would establish where within the former MGB area development is most required⁶⁸. As de-designation would potentially make available a very large quantity of land, this would impact the overall price of land, feeding strong deflation into development costs across the WSE and making housing cheaper (or at least no more expensive in real terms).

As suggested previously in relation to more restricted changes, it is the potential availability of a large new supply of land that would deflate land prices, and incentivise earlier development of urban brownfield land. In other words it is not a proposal to build all over the Green Belt, though it would make all de-designated sites potentially available for development (unless otherwise protected). In fact, developers already hold options on Green Belt land as well as holding land banks of non-Green Belt land. Although dedesignation would be a market-led solution, and would undoubtedly lead to significantly more 'concrete' within the current Green Belt, only a small fraction would be 'concreted over' and it would not be a present to developers, some of whom would be very unhappy with it, since it could dramatically reduce the value of existing land holdings and options.

In terms of our criteria, though this radical solution provides the best assurance of meeting housing supply concerns, it clearly falls down on all those relating to quid pro quos to make (what has been) an unpopular idea more popular. Arguably, it would lead to a substantial reshaping of the region's spatial development pattern that would better reflect development potential and individual preferences, though with less potential for community engagement and environmental protection than the wedges/corridors approach.

Our reality judgement is that, given the public fear of change, the unwavering support of successive governments for the MGB, and the vested interests that would potentially lose out, complete de-designation is not on the cards, and pursuing it simply seems an unnecessary battle. This 'practicality' is recognised by some market-led advocates of deregulation⁶⁹. If so, there remains a task of signalling to the market in some other

68 Papworth, T. (2015). *The Green Noose - an analysis of Green Belts and proposals for reform*. London: Adam Smith Institute.

69 Papworth T. (2016). *A Garden of One's Own; Suggestions for Development in the Metropolitan Green Belt (briefing paper)*. Adam Smith Institute: London.
<http://www.adamsmith.org/wp-content/uploads/2016/01/A-Garden-of-Ones-Own.pdf>

way a governmental intent to take a substantially different approach to land supply/constraint, as a necessary step towards enabling access to affordable housing of decent quality, particularly within this important region.

4.7 Comparing the Options

This project has provided a first overview of the set of options for securing substantial release of land for potential housing development within the WSE. Further serious consideration of what could and should be done with the MGB in order to get house-building moving in this region ought to take this approach further, looking (as we have started to) both at the substantive and the political potential of options. From a first pass, we see the greatest potential as lying with the more strategic options, of new settlements and particularly some version of the coordination corridors approach. However, the issue is too important, and sensitivities have been so strong, that a singular (all eggs in one basket) approach is probably too risky. We note that the Outer London Commission advocated both strategic reviews and coordination corridors⁷⁰ (though it did not relate the latter explicitly to the MGB). We can see clear merits in that, but also maybe in combining a modest version of the ped-sheds approach (as a signal of serious intent) with a more strategic option. Turning a choice of approach into effective action, however, is a big step, involving the initiation of a process of change, with various uncertainties, and finding ways of sustaining effort over the long term.

⁷⁰ Sometimes referred to also Growth Corridors.

5. Translating Reform Ideas into Practice



5.1 Overcoming Obstacles to Change

We return now to the question motivating this project. This is *neither* simply:

- does the Green Belt need reforming (on which our position remains simply positive) *nor*
- which reform scheme would we recommend (since we see several combinations as having merits), but rather
- what kinds of strategy for what kinds of change have a good chance of engendering worthwhile reforms, for the medium and long term?

As we noted earlier, there are a series of obstacles to effecting any such reform, including the fragmentation of governance in the Wider South East, specific stakes which some constituencies hold that might be threatened by change from the status quo, a broader concern that any change may lead to the whole (valued) edifice being brought down - *and* suspicions that 'London' interests are seeking to gain (or avoid pain) at the expense of the rest of the region. More generally, there is the (apparently) simple fact that the status quo is known/safe while moving away from this necessarily involves uncertainties. Against this last point it is entirely reasonable to answer that the housing market/economic consequences of doing nothing are either certainly very bad or lead to very much greater uncertainties for the future of the region and its residents⁷¹.

To make progress, we believe it is necessary now to start a process of building a consensus within the region for some versions of reform, both institutionally and through looking concretely at some of the detail of available options that could offer more direct incentives for positive engagement from communities more directly affected. In our judgement it is unrealistic to expect this all to happen very rapidly, but changes need to be geared to long term sustainability, not just addressing a short term crisis – and this should be planned as a learning experience, not a single leap in the dark.

These considerations influence our view that some version of the wedges/ corridors approach should play a key part in a reform package, and specifically one focused on the (currently five) 'regional coordination corridors' running out from London. Beyond this (provisional) proposal, we now try to put some flesh on the bones of a feasible implementation strategy, drawing from discussions during the course of this project to focus on three issues/approaches, which we discuss in turn:

⁷¹ *Physically little would be likely to change in that case. Notwithstanding continuing protection, incremental development within the MGB might well increase, but without radically changing its character. There would be scope for land of poor quality to be improved over time, and similarly with access conditions, though past experience suggests that a mere prospect of such improvements is not likely to yield much change in the foreseeable future. The uncertainties about the ramifications of freezing the status of the MGB are: where dwelling construction would be displaced to; what other development constraints would need to be eased in the process; the economic and quality of life implications if house-building in the WSE remained far below projections of need, and; the environmental implications of a more dispersed settlement pattern across southern England.*

- *necessary* conditions to make specific schemes acceptable
- mechanisms for *collaboration and leadership* within the region
- the merits of a *pioneer approach*, building from a pilot initiative in one coordination corridor.

To emphasise, the aim of presenting these in a suggestive form is not to put up a ‘scheme’ - to be taken up, campaigned for or rejected - rather, it is to provide a stimulus (and some material) for discussion, among both those who could be key actors and the wider regional population, about how the MGB could positively be reformed on a sustainable basis.

5.2 Necessary Conditions for Acceptability

Any planned change in the Green Belt reasonably requires satisfaction of a number of key conditions to reflect the consequences and opportunities of a significant change in policy, which we take to include:

- i. Some mechanism to apply enhancement of land values to support of development and compensating benefits in affected communities
- ii. inclusion of affordable housing (as well as contributing to the wider affordability of accommodation)
- iii. a contribution to enhancement of undeveloped parts of the MGB;
- iv. optimisation of densities
- v. integration of housing and employment development with public transport provision

Implementing a scheme for MGB reform will require careful attention by groups engaged in the process to the conditions under which planned and strategic changes are made. Each of the items listed above were discussed during workshops on this project, but necessarily in a selective/illustrative manner. So here we simply signal and outline significant points, with some examples, including the important point that all of these are linked, and with a need to balance them for each to be delivered appropriately.

During the project we returned on several occasions to the matter of **a mechanism to address enhanced land values**. As we stated at the outset, any development in the MGB should be socially beneficial, helping to deliver much needed housing, making it more affordable and improving internal space standards. Any policy change must not be an exercise in making it easier to develop sites for developers and providing windfall profits for landowners, as this would be a poor exchange for building in the MGB. Capturing value is a longstanding issue in the UK planning system and it is not within the scope of this project to offer a definitive solution. However, working out mechanisms that provide public benefit without discouraging landowners and developers, and which don’t drive down the quality of housing should be a pre-requisite for MGB release. With one of the

strategic options, these might draw on the original Garden Cities model and its adaptation by URBED⁷² (referred to in section 4) with public/private management of land acquisition possibly through an 'MGB Corporation', or a variant of the Community Infrastructure Levy. We are aware of a lot of relevant work on these issues, which are clearly very important in this context, but have not investigated them in depth.

One reason for seeking to capture some of the value of development is to fund **provision of affordable housing**. While the long-term purpose signalling the availability of more land for housing would be to suppress house price inflation, in the short to mid-term formal mechanisms for achieving affordable housing would be necessary. We note that whatever methods are arrived at for developing on former MGB land, the present piecemeal system of developing in the MGB is, largely, a missed opportunity.

Also linked to the first condition is a requirement to **enhance the MGB**. As well as a planned approach bringing more surety to where development will take place, it can also provide a more systematic approach to improving parts of the vast bulk of the MGB that would remain. Shifting policy towards the 'green' dimension of the MGB, on which public concern is clearly focused, should involve both a substantively greater emphasis on its multi-functionality - in relation, for example, to providing rainwater runoff, providing public access and enhancing biodiversity⁷³ - and monitoring by local authorities of baseline levels/changes in: access, quality and uses. At the same time, poor maintenance of land cannot become a justification for its removal from the MGB as this gives the wrong signal to land owners. Getting more out of the openness of land will therefore be more a matter of carrots than sticks, and will require funding.

One option for doing this relates to the uplifts in land values. One possibility, raised in our workshops, would be a 'green belt levy' that would ring-fence some of the money raised through capturing uplift in land-values for improvements. Another example would be the use of legal agreements where landowners would contract to improve remaining MGB land and/or offer access as part of a permission to develop other parts. These are just two possibilities, again, not recommendations, and other options should be developed and tested. However, we stress the danger of 'spending' the uplift in land values many times over.

Optimising densities. In addition to refining the 'where' question, working through the detail of 'what' development might take place on former MGB land is also an important task. Here the question of density is important because:

- first, it is linked to claims for how much housing could potentially be delivered, and
- second, it contributes to discussion of what any development would look like if delivered. We are cautious of simplistic claims for density, as, in practice its application and effects are complicated. Nevertheless, it provides a starting point.

Clearly, producing development at substantially higher densities could produce more housing but this can increase the cost of housing and might lead to an overly urban form in, essentially, suburban locations. One of the claims for developing some of the MGB is

⁷² URBED (2014). *Uxchester Garden City*.

<http://urbed.coop/sites/default/files/URBED%20Wolfson%20Entry%20low%20res.pdf>

⁷³ *Green Belts: a Greener Future*. Undated.

that it could provide family housing with gardens that is increasingly unaffordable in cities. This could contribute to forming socially mixed and stable communities. Getting the density 'right' includes, but is not limited to, providing a family home environment while supporting public transport – around 25dph for a bus service and 60dph for a tram. Moreover, only about 25% of journeys are likely to be commutes along rail routes. Households make many other journeys, to shop, to schools, health centres and so on. Density could contribute to producing services within reach of households by walking, cycling and public transport, potentially discouraging car use. Examples of development at various densities were given in earlier government advice⁷⁴ and other examples abound on the Web. The examples given in Figure 8 show a uniform density and building type but, of course, a site might contain a variety of building types and densities. We could easily anticipate a more dense development near to stations, reducing away from the 'centre'. Through our workshops densities of 100dph were raised.

Figure 8: Examples of density.
Poundbury Dorchester, 34dph
Jesmond, Newcastle, 43dph
Friars Quay, Norwich, 54dph

Source: DCLG (2001 *Better places to live by design*).



⁷⁴ DCLG. (2001). *Better places to live by design: companion guide to planning policy guidance 3*. <https://www.gov.uk/government/publications/better-places-to-live-by-design-companionguide-to-planning-policy-guidance-3>

An important design matter partly related to optimising density is the need to **integrate housing and employment development with public transport**. All new development brings with it a real concern for increased levels of road traffic. Of course, in many instances development in parts of the MGB will simply see increases there rather than in an alternative location not in the MGB, rather than an absolute increase in traffic. The problem is, therefore, a general one linked to our dependence on road transport. As with any new development it will be important to seek to reduce the need to travel by car and density can contribute to facilitating the integration of housing and employment development with public transport.

5.3 Securing Collaboration and Leadership for a Reform Project

Two themes which we have emphasised in this report are:

- the need for a WSE-wide perspective on housing and land-supply, in order particularly to understand that the tightness of development constraints outside London is a serious obstacle to getting enough of London's potential brownfield sites developed, despite strong efforts by the GLA to achieve this – as well as to resolve similarly acute supply issues in other parts of this super-region
- the need to frame proposals for reforming the MGB in ways that can command sufficiently widespread support among a still sceptical population within this region, in order to convince a very reluctant central government to enable such reforms to proceed, and in order to build the collaborative capacity across a fragmented and historically polarised region to implement new lines of development.

Despite growing professional and evidential support, pursuing the line that MGB reform is a WSE-wide necessity, suspicions will doubtless remain that this is a way of 'letting London off the hook' in relation to its responsibilities. But if collaborative action is required in order to get things moving, London, with the only significant regional level actor, in the Mayor, has to be able to play some kind of leadership role.

In the remainder of this section, therefore, we discuss issues: first, what should be done within London itself (where the new Mayor has yet to be convinced); and then, the forms of wider collaboration required to implement some of the more strategic forms of reform - notably the coordination corridor option.

London Although only 7% of the total MGB is within Greater London, this constitutes 22% of the land area of Greater London. For active and realistic collaboration between London and the WSE, therefore, it is particularly important that London not only continues to pursue internal policies of intensification, but also plays a leadership role by: reviewing the current appropriateness of its own part of the MGB; actively contributing to the processes of MGB review by other authorities in the wider region, and; relating that to joint infrastructure planning in the coordination corridors and elsewhere.

As far as MGB land within Greater London is concerned, national policy's core concern with maintaining a physical separation between London and other urban areas scarcely applies. In these terms there is a logical case to let London expand within its own borders, subject to meeting other salient concerns, and pursuing a more purposive and selective 'greening' strategy. For example, a planned approach to MGB review within London could produce development that defines green corridors including by the use of mechanisms such as Metropolitan Open Land. This could support the call for a national park for London, through a London green network or web, as seen in Harlow. In this way we could return to the earliest purpose of the Green Belt, to offer access to green and open space for people who live in London. This could support other policies including: suburban densification in existing built up areas; more efficient planning for brownfield development in London's MGB, and; the intensification of land use close to existing public transport infrastructure. However, London should be review its part of the MGB with the criteria and with an open-mindedness to match those to be applied in the rest of the WSE.

Since London has a 'regional' structure in the shape of the Mayor/Greater London Authority, it does uniquely have a formal mechanism to coordinate change. As elsewhere, however, the NPPF leaves Green Belt review to the local planning authorities (i.e. boroughs). Eighteen London boroughs contain MGB and each individually decides on and then administers Green Belt reviews. Given that London has a regional structure, this affords the opportunity for a more coordinated approach, as there is the potential to give the Mayor a strategic role, including the development of a London-wide review of the MGB. As in the case of the 'ped-shed' and 'corridor' options, a legal change might be required, in this case to allow the Mayor to oversee a strategic review of London's part of the MGB. The Outer London Commission report, however, took the view that it would in any case be permissible for the next London Plan to:

'provide strategic methodology/principles to coordinate such local reviews on a consistent basis. This could take into account 'London specific' factors such as Coordination corridors, the Plan's emphasis on land use/transport integration and its distinct approaches to housing density and environmental quality'⁷⁵

By being seen to take a bold step within its borders the London administration can reasonably urge that districts beyond its borders do the same. As well as this, it can offer methodological support for co-ordinated reviews elsewhere in the WSE. At the outset we noted that the MGB generates polarised debate, and mayoral hustings were clearly not the occasion to open up discussion of the Green Belt. Now, however, the need both to deliver on housing promises, and to offer a more convincing explanation in the next version of the London Plan of how targets will be met, should necessitate a more nuanced approach. In London, therefore, the first task is to persuade the Mayor of the need to embrace a coordinating role in Green Belt review. As Green Belt review is an existing practice available to the Boroughs, it is not a departure from commitments made in the recent electoral campaign simply to take on the strategic oversight of these reviews, including developing a standard methodology.

Collaboration across the WSE: The disincentives to cooperation on new housing are made worse by the absence of regional planning structures. The Government is adamant in its

⁷⁵ Outer London Commission. (2016). *Seventh Report: accommodating London's growth*. https://www.london.gov.uk/sites/default/files/olc_accommodating_growth_main_report_fixed.pdf page 13.

opposition to regional planning, relying instead on establishing a ‘duty to cooperate’ between local authorities and on the promotion of neighbourhood planning. We are not dismissive of neighbourhood planning as it might usefully produce local engagement and some additional local housing, but neither it nor the duty to cooperate is engineered to produce a strategic response to the housing needs of the WSE. The need for a more strategic, dare we say regional, approach is exemplified by new transport infrastructure.

Within the last couple of years there have been encouraging moves involving leaders from across the WSE and the London Mayor to develop a framework for more active collaboration across the region, as a response to the gap between a purely localist structure and pressing wider issues in relation to both housing and infrastructure⁷⁶. Developing coalitions of the willing in response to recognisably shared interests among particular groupings of authorities, is a very important step in this direction, with one notable case being the ‘London, Stansted, Cambridge Consortium’ representing a proactive corridor-based coalition developing particular cooperation across multiple areas and agencies, particularly in relation to economic development.

5.4 A Pioneering Approach

Building support for some kind of MGB reform is a long-term task, as it would have to sustain itself through to collaborative forms of implementation. This is especially the case for the wedges/corridors option, which in our view offers the prospect of being a more productive reform option. Regardless of the eventual chosen approach, we would argue that the next stages in developing a reform initiative should include not only an evaluation of the best available approach to achieving this, but also an implementation framework incorporating a pioneer initiative in a part of the MGB (across the London border). This should be in a location with strong potential both developmentally and organisationally. The aim would be to: get things moving; to build necessary bases for collaboration and consensus; and to learn about which strategies and which kinds of regulatory change are necessary or ineffective.

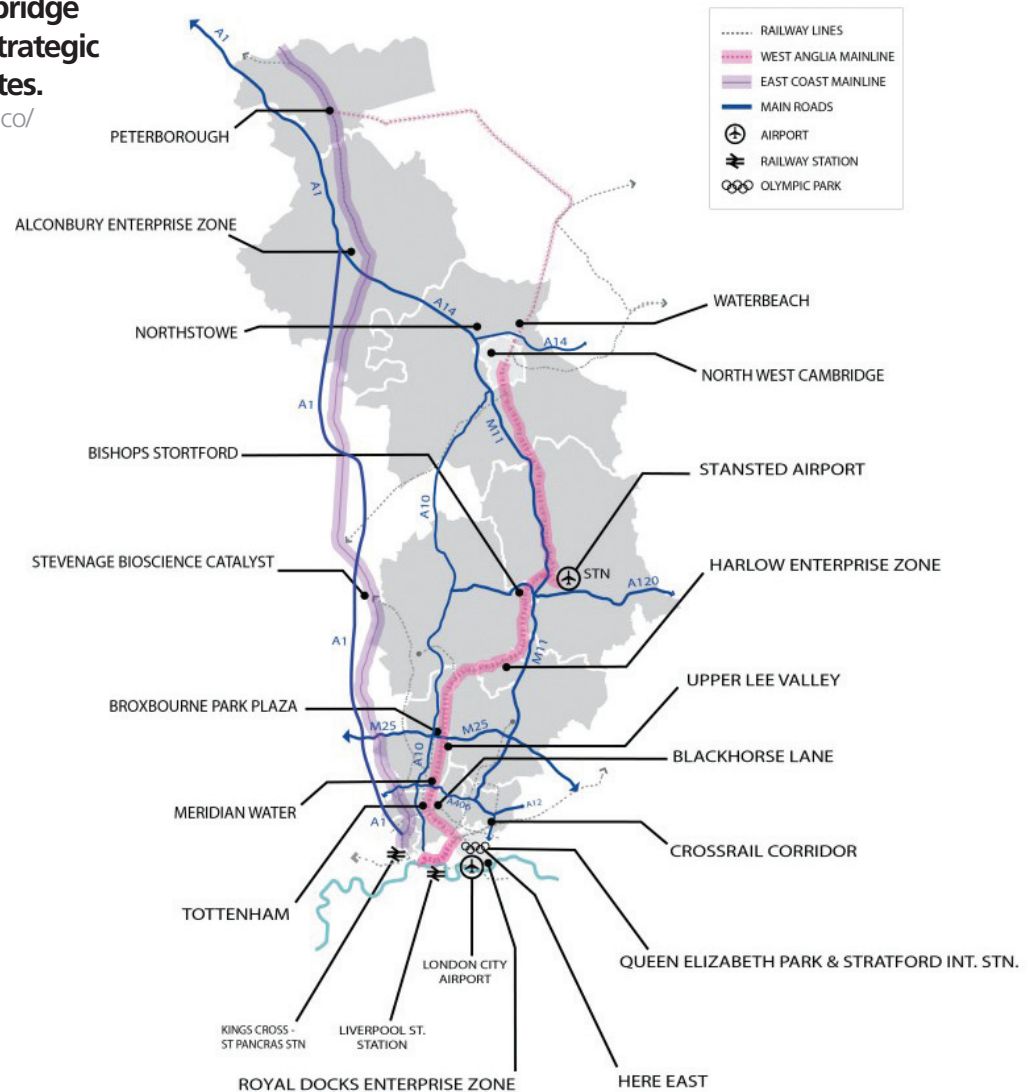
Given our view that the wedges/ corridor approach holds special potential for MGB reform, in both the long and short term, we suggest that an effective way to kick-start change would be to introduce an initiative in one of the city-region’s dynamic coordination corridors that should act as a stimulus to develop a new approach to Green Belt policy. A ‘pioneer corridor’ would both send a strong message, and give the opportunity to accumulate experience about how positive change can be secured, in a context where the issues are demonstrably much broader than any ‘raiding of the Green Belt’ for housing land. Given long-developed interests in maintaining the MGB and political sensitivity, co-operative coalitions of the willing should be actively developed to secure a consensus within the corridor about how MGB release should be managed for mutual benefit. As we have already noted, the London, Stansted, Cambridge Consortium offers a good example of a corridor-based coalition that

76 These are positively discussed with proposals for how they can be built on further by the Outer London Commission, in its Fifth Report of 2016, which complements its proposals in relation to strategic options in the Seventh Report.

provides potential cooperation across numerous jurisdictions. It has started to develop details of a coordination corridor drawing on the existing West Anglia and East Coast Mainline (Figure 9)⁷⁷. The Consortium offers an example of a partnership through which a vision for the future of the MGB could be articulated. Our suggestion, therefore, is that a defined area around this corridor might provide the most suitable locale in which to pursue such a pioneering approach.

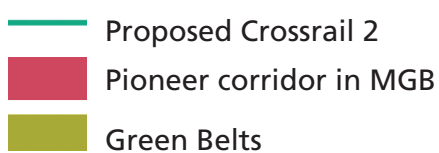
Figure 9: The London, Stansted, Cambridge Consortium's Strategic Opportunity Sites.

Source : <http://lsc.co/>



Failing this, we would suggest another of one of the corridors identified in the London/Infrastructure Plans. However, in any event we strongly recommend that those taking on board the role of promoting a reform case should be looking to do so on a stepwise basis, starting from a pioneering set of areas, rather than the whole of the MGB, though working towards that coverage.

⁷⁷ London Stansted Cambridge Corridor. <http://lsc.co/>

[illegible]

6. Summary and Conclusions



There is a strong case to bring some relaxation of land-use constraints into the range of policy options (alongside intensification), in order to address the WSE's chronic shortfall in housing provision. We recognise, however, that it will take time to secure agreement on the role that MGB reform should play in this. Modernising the MGB, established 60-80 years ago, to meet the circumstances of a new century and a very much more dynamic regional economy requires forms of change that the current NPPF cannot secure in its present form. Specifically, it gives responsibility for reviews to local planning authorities but it effectively rules out major or strategic change, and indicates that national government itself will not pursue such change. This is a recipe not simply for fossilisation, but for waves of piecemeal incremental revision to the Green Belt. In an era of purely local planning this chips away at bits of Green Belts, while inhibiting strategically coherent settlement and environmental planning – adding to public insecurity about 'where it will all end' that has blocked reasoned discussion.

The two starting points for this project were,

1. acceptance of the argument (now widely shared across the professional/ practitioner community) that the MGB needed to be substantially reformed, and
2. a conviction that progress beyond a fruitlessly polarised debate about principles (and fears) required attention to both:
 - alternatives to what the MGB could do and, therefore, how it should be shaped, and
 - the preconditions for securing acceptance and support for some such action, across the WSE and then from central government.

On reform, the project has reinforced our view that this is needed. It has helped by clarifying two distinct ways in which MGB reform could and should contribute to resolving the region's major problem of inadequate residential supply. The more obvious first way is that reform can help address the short to medium term issue of inadequate construction (the housing crisis), by adding the potential of extra housing land from MGB sites to that which can be expected from brownfield sites and urban intensification. The less obvious, second way, involves dealing with the long-term effects of land constraint, including its impacts on behaviour. This includes the reasonable and widely shared assumption that planning constraints will always mean that the supply of residential land in this (otherwise dynamic) region is inelastic. As we noted before, this leads to a long-term (chronic) reluctance to use the pipeline of possible development sites 'too rapidly'. A combination of the MGB with greenfield development quotas thus means that the potential of urban brownfield sites will not be realized until expectations of tight control elsewhere are changed.

The project has also clarified our understanding of the second point, in several ways. One involves 'slippery slope' fears about where any softening of MGB controls might lead – since its 'green' aspect is still highly valued, though that is less evident for the 'belt' aspect, which is central to the expressed policy. Another involves the obstacles to recognising a shared super-regional housing supply problem rather than one simply focused on London. Given the Wider South East's extended, diverse and administratively fragmented territory, the challenge is collaboratively to develop proposals to address the super-regional housing supply problem - with suitable central government backing.

The purpose of the project was thus: - to identify ways of modernising the MGB in ways that: enable a higher level of housing supply to be achieved on a compact basis in sites with good public transport access to employment centres, without impinging on areas of particular environmental quality; and secure the protection of the rest of the MGB. Via a process of consultation and group working with a range of interested experts, practitioners and policy-makers from across the region – and a lot of reading – we have drawn out common themes, evidence and lines of argument into a report which sketches:

- Six available lines of action for achieving change within the MGB, and a set of criteria against which they might be rated (Section 4)
- An approach, with a set of conditions, to initiating and pursuing a process of policy development and action with prospects of achieving support within the region (Section 5).

More specifically, we reject both extremes of the action range (relying on ‘applications and appeals’ or pursuing a simple de-designation) and the adequacy of just promoting ‘local reviews’ even on a concerted basis, without addition of one of the more strategic approaches. Among the latter (versions of which have been promoted at various points in the MGB’s history), we see particular potential in a version of the green wedges/coordination corridors model – specifically in relation to the set of coordination corridors recognised in Mayoral ‘Plans’ for London and long-term infrastructure plans.

In relation to an action-promoting strategy, we emphasise three points in particular:

- the need to specify a set of conditions under which planned development would occur, including ‘deals’ in relation to substantial (compensatory) enhancement of access/greening in unaffected areas of the MGB, resources for infrastructure etc.
- the critical importance of building up mechanisms and support for collaboration across districts, boroughs and counties within the WSE with a relevant range of partners. These should/could be built on established and emergent capacities in the coordination corridors
- as a first, necessarily experimental, step toward a long term development, to seek to establish a ‘pioneer corridor’ (or equivalent if a settlement based approach were favoured), with a model set of powers facilitating development within designated Green Belt areas associated with this corridor – the most obvious present ‘candidate’ being the London-Stansted-Cambridge corridor with its established consortium and economic growth plans.

The Metropolitan Green Belt has been a pioneering example of strategic planning practice, firmly and effectively pursued over seven decades, with clear effects. Some of these are recognised as quite perverse, for example, in relation to housing supply and encouraging unsustainable forms of travel. These have greatly increased significance in changed times when growth pressures are very much greater than originally envisaged.

The MGB is a highly valued feature of the region, though the most valued (green) features are not dependent on the breadth and continuity of its ‘belt’. Any substantial

changes in its form and position should be designed both to secure and enhance the most positive features, and to mitigate fears of a slippery slope toward continuing erosion that undermined these.

In our judgement, significant change - and reforming the MGB - is necessary. However, this needs to be approached through a calm, reasonable discussion of alternative approaches and how some combination of these could actually and acceptably be implemented for the long term, in ways that unfreeze housing supply in the region, enhance environmental sustainability and contribute to a coherent long term form of spatial development across this vital region.

The report offers some ideas to assist in this process, and commends these to those who could actively shape the necessary processes of change.

Note on the project



The project took place between October 2015 and June 2016. The purpose was to bring together existing work on the MGB and to disseminate this through this report and a short film. The team met with a series of individuals throughout and organised a series of events to bring together experts.

Launch – 3 December 2015

Workshop 1 – Purpose and means of the MGB – 21 January 2016

Workshop 2 – Methods of review and their outcomes – 28 January 2016

Workshop 3 – Garden cities and urban extensions – 11 February 2015

Workshop 4 – Infrastructure and land value – 10 March 2016

Workshop 5 – Landscape planning – 14 April 2016

Workshop 6 – Recommendations – 5 May 2016

Final event – 26 May 2016

The following individuals attended events. We are grateful for their input. The content of this report does not necessarily reflect either their individual views or those of their organisation.

Gerry Ansell, Enfield - Kate Bailey, Landscape Institute - Catherine Bailey, Maldon District Council - Stephen Barrett, Rogers Stirk Harbour + Partners - Andy Barron, ARUP - Chris Bearton, TfL - Richard Blyth, RTPI - Duncan Bowie, University of Westminster - Roland Brass, GL Hearn - Adrian Brown, Berkeley Group - Nicola Carnevali, Rogers Stirk Harbour + Partners - Gary Charlton, Natural England - Paul Cheshire, LSE - Edward Clarke, Centre for Cities - Douglas Cooper, Broxbourne - Mike Davies Rogers, Stirk Harbour + Partners - Merrick Denton, Thompson Landscape Institute - Gareth Fairweather, TfL - Nicholas Falk, URBED - Melissa Fernandez, LSE London - Mathew Frith, London Wildlife Trust - Nick Gallent, UCL - Mark Gibbins, Indigo Landscape Architects - James Harris, RTPI - Dieter Helm, University of Oxford - Kate Henderson, TCPA - Simon Hicks, AECOM - Nancy Holman, LSE London - Jane Houghton, Natural England - Jonathan Kenny, CEG - Mike Kiely, POS - Max Laverack, ARUP - John Lett, GLA - Paul Lincoln, Landscape Institute - Katy Lock, TCPA - Paul MacBride, Harlow - Duncan Mackay, Natural England - Jonathan Manns, Colliers International - Piers Mason, Tandridge - Rachel McElhone, TfL - John McGill, LSCC - Fiona McKenzie, The Environmental Dimension Partnership - Paul Miner, CPRE - Ulises Moreno-Tabarez, LSE London - Alessandra Mossa, LSE - Tony Mulhall, RICS - Stewart Murray, GLA - Tom Papworth, Adam Smith Institute - Katherine Pelton, Enfield - Jorn Peters, GLA - Stewart Pomeroy, Groundwork - Daniel Raven-Ellison, London National Park City - Catriona Riddell, Catriona Riddell Associates - Philipp Rode, LSE Cities - Rachael Rooney, GLA - Vanessa Ross, Arc Landscape Design and Planning - David Rudlin, URBED - Stephen Russell, Landscape Institute - Peter Schofield, DCLG - Martin Scholar, Barratt London - Jonathan Seager, London First - Sam Sims, Centre For London - Ben Smith, AECOM - Chris Smith, Hounslow - Henry Smith, TCPA - Shaun Spiers, CPRE - Barney Stringer, QUOD - Corinne Swain, ARUP - Martin Tedder, TfL - Patrick Thomas, Linden Homes - Michael Thornton, Hounslow - Julia Thrift, TCPA - Lisa Toyne, Barton Willmore - Tony Travers, LSE - Eleanor Trenfield, Barton Willmore - Chris Tunnell, ARUP - Tom Venables, AECOM - Peter Village, CEG - David Watts, Harlow - Christine Whitehead, LSE London - Peter Wright, TfL - Yimin Zhao, LSE

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