

Theydon Bois Action Group

PROTECTING THE VILLAGE OF THEYDON BOIS

Dr J Warren
Chairman
Theydon Bois Action Group
[Address redacted]

21 September 2017

Office of Rt Hon Sajid Javid MP
Secretary of State for Communities and Local Government
House of Commons
London
SW1A 0AA

And by email to: sajid.javid@communities.gsi.gov.uk

Dear Mr Javid

Building on the Green Belt is not the answer to fixing the 'broken housing market'

I write as Chair of Theydon Bois Action Group (TBAG), a group formed in 2005 at the suggestion of our Parish Council because of concern about damage to the local environment from unauthorised landfilling. Since then, our supporter numbers have grown and we now work to protect the Green Belt surrounding our Epping Forest village from issues that affect our village and threaten the Green Belt.

The Planning Inspectorate is an Executive Agency of Government. We call on you now to issue a new Policy Instruction to the Planning Inspectorate confirming the Planning Practice Guidance published by the Coalition Government on 6 October 2014 which states that *"Unmet housing need ...is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt"*. Specifically, we seek the new Policy Instruction to clearly confirm that unmet housing need does not represent the very special or exceptional circumstances necessary to allow inappropriate development in the Green Belt or for the alteration of Green Belt boundaries; nor does the absence of a five year supply of housing sites represent those very special or exceptional circumstances. We would refer you to Paragraph 157 of the National Planning Policy Framework (NPPF), bullet point 7, which states: *"Crucially Local Plans should: ... identify land where development would be inappropriate, for instance because of its environmental or historic significance ..."*. Clearly, the Green Belt has an environmental significance and this should mitigate against Paragraph 159 of the NPPF which states that population projections should take account of migration and demographic change.

In Epping Forest District the projected population growth to 2033 is not simply from natural change within the District but rather from internal migration, largely from Greater London, from people who want to live here but do not need to live here. Epping Forest District comprises over 94% Green Belt land and this is a natural environmental constraint as described in Para 157 of the NPPF. The Green Belt is the single characteristic that defines this district's identity. We do not consider that Local Authorities with a large proportion of Green Belt land should feel obliged to alter their Green Belt boundaries to accommodate increased levels of migration from the growing population in London, particularly when there are available brownfield sites in London and the Government has stated that brownfield sites should be developed first.

May we respectfully remind you that on 18 July 2016, as Government's newly appointed Secretary of State for Communities and Local Government, you said: "**The Green Belt is absolutely sacrosanct.** We have made that clear: it was in the Conservative party manifesto and **that will not change.** The Green Belt remains special. Unless there are very exceptional circumstances, we should not be carrying out any development on it." That manifesto may have been superseded, but still the current Conservative Manifesto states also: "We will build better houses. ... that ... means maintaining the existing strong protections on designated land like **the Green Belt**, National Parks and Areas of Outstanding Natural Beauty..." (emboldening added).

The public must have confidence that this Conservative Coalition Government will **in practical terms** protect Green Belt as it has been claiming it would. The Planning Inspectorate, in examining Local Plans submitted by Local Authorities, is currently approving some Plans which seek to move established Green Belt boundaries in order to enable the building of, inter alia, new homes to meet unmet housing demand. While it is recognised that new housing is needed in England, building on Green Belts is directly contrary to the Coalition Government's stated Policy Guidance and specific Green Belt Policies and further, it is often contrary to the wishes of the established communities in or adjacent to those Green Belt areas.

It is common knowledge that there is a large percentage of brownfield land within London that has yet to be developed (as cited in the Stirling Ackroyd Report of 2014 stating that "London could see up to 570,000 new houses over the next 10 years"). It is also clear that developers find green field sites more lucrative than brownfield sites and are active in lobbying Government both directly and indirectly through patronage of major research institutions who seem to influence Government policy (The Sunday Times, 5th February 2017 - 'Lobbyists behind attack on green belt'). Coupled to this there is also a body of opinion that property development companies also make financial contributions to the Conservative Party. It seems clear that developers are very much in the driving seat with respect to what gets built and where. Affordable homes are not preferred by developers who, within our district, are often offering S106 financing to the Local Authority so as to avoid building the required number of affordable homes within their executive development schemes. Developers also control the rate of development and seem to drip feed properties onto the market to keep house prices buoyant. Ebbsfleet in Kent is a prime example of where approved development has proceeded at a snail's pace. This matter of land banking needs to be urgently addressed by Government. In London we have new luxury apartments effectively being built for overseas investors, rather than Londoners. These properties are often marketed in places like Hong Kong before they are advertised in the UK.

The Coalition Government claimed in 2011 that they were protecting Green Belts by revoking the Regional Plans, but now Government is imposing **unattainable** housing targets on Local Authorities who are constrained by established Green Belt land. If these housing targets are not met, despite the constraints, the Local Authority will be financially 'punished' along with the threat that the Government will step in to enforce a local plan on the district. Local Authorities are being bullied by this Coalition Government into moving Green Belt boundaries, not only in contradiction of Government's own stated policy, but contrary to paragraph 80 of the NPPF which sets out the five purposes of Green Belt, of which I trust you are well aware and do not need me to re-state here.

Government has remained consistent across several years and various Ministers, with its stated support for protecting the Green Belt and green spaces. It is noticeable that under the last Coalition Government, Conservative Ministers were more vociferous about protecting our Green Belt than they were when in sole control of our country and we understand you omitted mention of the Green Belt from your prepared speech to the House on 14 September 2017 (Debate on Local Housing Need). Nonetheless, the current Coalition Government's Manifesto and relevant planning policy remain unchanged and clear in their terms.

TBAG has collected 21 Ministerial Statements and a Statement by the Mayor of London which variously supports the principle that the Government will protect the Green Belt and that the need for housing does not outweigh the exceptional circumstances required to build inappropriately in the Green Belt. We would ask for this Coalition Government to make good on its promises. See the Ministerial statements and quotes from other relevant publications (with links) at: <http://www.theydonbois-actiongroup.co.uk/2016/11/06/ministerial-statements-and-a-statement-by-the-mayor-of-london/>. This evidence is irrefutable and Government must be seen to be speaking the truth by acting on its words. Can you offer any justification for deviating from these statements?

There is a general view from Green Belt constituencies across the country that Government is effectively saying that it is not them, but rather the Local Authorities that have decided to alter Green Belt boundaries for development. In other words, passing the buck of responsibility for the desecration of our Green Belt to the Local Authorities. The Metropolitan Green Belt was established **to prevent urban sprawl from London** but building within the Green Belt for people who don't need to live here will effectively result in urban sprawl by proxy. Furthermore, these growth figures will be taken into account when preparing Local Plans in 20 years time, resulting in even more development of the Green Belt. Epping Forest District Council (EFDC) is currently proposing to alter some Green Belt boundaries in its Draft Local Plan, in order to accommodate the levels of housing which it considers must be met, under pressure of ensuring that the Plan will be found sound at Examination in Public. EFDC has already stated that further changes to Green Belt boundaries are likely for future Plan periods – a promise of ongoing loss of Green Belt land without limits for future generations.

Do you appreciate that a lot of Conservative voters live in Green Belts up and down the country and few are content with the prospect of developers arriving to rip up the countryside where they have chosen to live/settle and invest?

I would greatly appreciate your full and frank response and I look forward to hearing from you on the points that I've raised.

Yours sincerely

Dr John Warren
Chairman
Theydon Bois Action Group
Protecting the Village of Theydon Bois
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