

BROWN FOR BLUE

Land to house London's emergency workers

METHODOLOGY

This report draws on a range of data sources, including but not limited to:

- **Freedom of Information requests** made to all London boroughs with Metropolitan Green Belt within their area. Boroughs with a Local Plan or Core Strategy predating the National Planning Policy Framework (NPPF, adopted March 2012), or which had recently submitted a new Local Plan to the Planning Inspectorate were asked about their emerging Local Plan. Other boroughs (i.e. those that adopted their Local Plan or Core Strategy after the NPPF had been adopted and that had not submitted a new plan yet) were asked about their current Local Plan.
- **Freedom of Information requests** made to the Metropolitan Police Force, London Fire Brigade and London Ambulance Service.
- **An LCCI commissioned mapping exercise** undertaken by FIND* of all 'brown space' within Greater London's Metropolitan Green Belt.¹
- **LCCI commissioned polling** undertaken by ComRes of 569 London business leaders between 8 August and 5 September 2017.
- **Interviews with a range of stakeholders**, including representatives of 'blue light' emergency services workers, academics, planning professionals working for outer London boroughs, London Councillors (particularly those with planning responsibilities) and LCCI member businesses.

Related publications

Since LCCI's May 2014 *Getting our house in Order* report,² on the undersupply of housing in London LCCI has published several related reports that this report builds on.



May 2015:

Unlocking London's housing potential: Making the most of London's public sector land

assessed ways to find land to increase the number of houses delivered in London



June 2016:

Living on the edge: Housing London's blue light emergency services

examined housing affordability for London's emergency workers, and the impact on London's resilience

Project partner

LCCI commissioned mapping company FIND to identify 'brown space' in London's Green Belt.



FIND is the UK's most advanced online mapping tool for businesses. We can provide Ordnance Survey maps, utility reports, 3D models, bespoke data analysis and consultancy services. Discover more at www.findmaps.co.uk or email consultancy@findmaps.co.uk.

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¹ With Greater London defined as the capital's 33 local authority areas, and the Metropolitan Green Belt defined as the statutory Green Belt around London.

² LCCI (2014) *Getting our House in Order: The impact of housing undersupply on London businesses*.



In our 2014 Housing report³ London Chamber of Commerce and Industry (LCCI) noted there was a need to consider how the undersupply of housing could affect future London resilience. Two years later our research found that the majority (54%) of London's 'blue light' emergency services workers – police officers, firefighters, ambulance paramedics – live outside London.⁴

At that time, we called on the Mayor of London to consider how this finding could impact on London's ability to deal with a major incident. We also suggested that the Mayor should consult on an alteration to the London Plan to formally identify the need for specialist emergency services worker housing as an important planning issue for London.

Both these LCCI points were adopted as recommendations in the final report of the independent review, undertaken by Lord Toby Harris, of London's preparedness to respond to a major terrorist incident.

It is important to emphasise that LCCI raises the point about resilience with matters of an extended duration in mind. Power network failures, industrial action, health pandemics or adverse weather each have the potential to quickly disrupt business and curtail economic activity – as well as place significant pressure on blue light services which largely perform their duties on a shift-based employment pattern. Such scenarios could prove particularly challenging if rail lines were disrupted, roads heavily congested, and mobility became severely impeded.

We know from engagement with their representatives that the cost of housing in London has been a central factor as to why most of our dedicated emergency services operatives live outside the capital. That is concerning, especially as we learn that, within a decade, London will achieve 'megacity' status with over ten million residents.⁵ Preparations to meet the challenges of that future metropolis must of course include broad resilience considerations. There is a prime opportunity to do just that in the review of the draft new London Plan that has just commenced and which will continue throughout 2018.

For this report LCCI placed a primary focus on brownspace* in the 22 per cent of London - across 19 boroughs - that lies in the Metropolitan Green Belt. All of us will have seen strips of land that has been neglected, derelict or unused for a long time. We were interested in mapping that and commissioned FIND to identify such land. That process along with Freedom of Information requests produced some interesting findings: that the 22 per cent of Greater London that is designated Metropolitan Green Belt contains 329 hectares of brownspace, which equates to 500 football pitches and that there are 63 golf courses within the London Green Belt of which 20 are located on land owned by a London local authority. Most crucially the brownspace identified has the potential for up to 20,000 newbuilds that could provide homes for the men and women in our police, fire and paramedic services.

Of course, any discussion making mention of 'building' and 'Green Belt' is contentious. However, this new report from LCCI suggests a limited intervention, with suitable safeguards, to make best use of poor quality and undesirable land to help house London's emergency workers.

The draft new London Plan review offers a platform for a serious conversation on the use of the capital's finite space. That conversation should be shaped by evidence-based, not political, points.

Colin Stanbridge, Chief Executive, LCCI

Definition*

LCCI adopted the term 'brownspace' to define land in the Metropolitan Green Belt, within London, that is disused or has a poor quality land use. For the London context, this has been conceptualised as:

- vacant, unused or derelict sites
- land with a poor quality use, including scrap and car breakers' yards, quarries, gravel and sand pits, storage yards (including builders yards, car parking and other run-down sites with sheds or workshops), nearly full landfill sites and lorry and transport yards.

For a full conceptualisation of this definition please see pages 6 and 7.

³ LCCI (2014) *Getting our House in Order*.

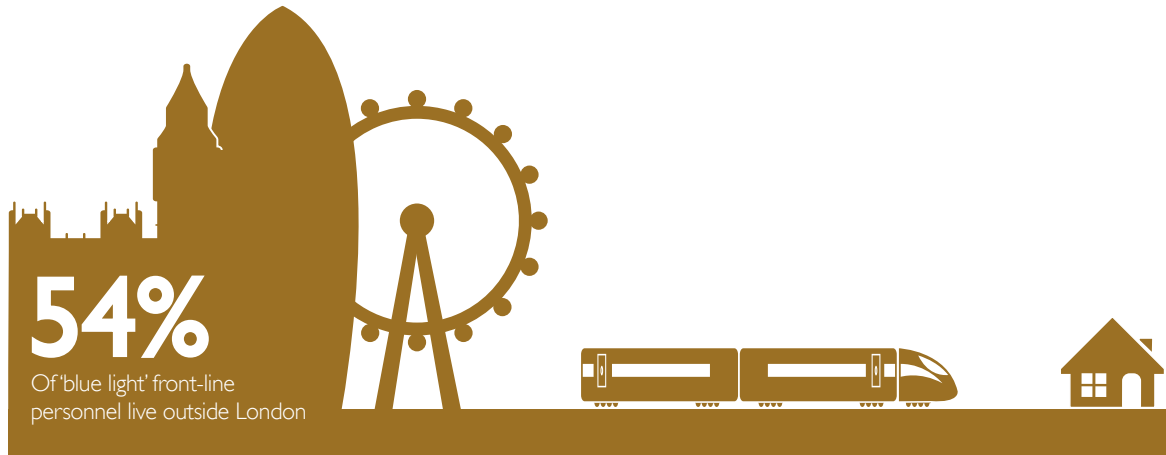
⁴ LCCI (2016) *Living on the Edge: Housing London's Blue Light emergency services*.

⁵ ONS (2016) *Subnational population projections for England: 2014-based projections*.

HOUSING LONDON'S EMERGENCY SERVICES

LCCI's June 2016 report *Living on the Edge: Housing London's blue light emergency services* found that high costs of living meant that more than half of London's front-line 'blue light' emergency services personnel were living outside London, which raised concerns about the capital's preparedness to respond to major incidents.⁶

Freedom of Information (FOI) requests made to the three main blue light emergency services by LCCI in the Autumn of 2017 found that the percentage of front-line personnel living outside London remains at 54 per cent.⁷



More than half of London's police officers, firefighters and ambulance paramedics live outside Greater London.

(Based on Freedom of Information requests made to each of the three emergency services, October-November 2017)

Discussions with representatives of London's blue light personnel revealed that challenges arising from the housing issue such as lengthy commutes and high stress levels remain. These, coupled with consequent impacts on recruitment and retention into the emergency services, give rise to concerns about the potential impact of the housing crisis upon the resilience of London and its economy.

"For us it is a major issue that so many firefighters in the London Fire Brigade can't afford to live in the Greater London area. Housing in London is so expensive that firefighters often can't live anywhere near their place of work. This can cause all sorts of practical difficulties because it may take at least a couple of hours for people to reach their place of work. There might then be that slight added risk that they won't be as fresh as they would like to be when they arrive for work, or their concentration is impaired. It also means they are spending less time with their families and their children and their stress levels increase when they are at work."

(Paul Embery, Executive Council Member, Fire Brigades Union (London))

"That so many London ambulance staff are being priced out of the capital is of great disappointment and impacts on the staff health and wellbeing, and the quality of service which we seek to provide for the people of London. Having to commute for several hours a day is bound to have an impact on the quality of overall performance. Fatigue and loss of concentration will at times present a challenge. It would be great to know that if the LAS required extra staff at short notice this could be achieved by staff who live in London, but many members live outside because of the cost of housing in the capital."

(Tony Scantlebury, Branch Political Officer, GMB London Ambulance Service)

The Harris Review

In May 2016, the new Mayor of London Sadiq Khan appointed Lord Toby Harris of Haringey to undertake an independent review of London's preparedness to respond to a major terrorist accident. LCCI was consulted by Lord Harris during that review, which reported in October 2016.

Two recommendations from LCCI's *Living on the Edge* report were incorporated in the final report of the Harris review:

- For the Mayor to ask the chair of the London Resilience Forum to consider how London's preparedness to deal with a major incident may be impacted by a majority of the three main 'blue light' emergency services workers living outside London.
- For the Mayor to consult the London boroughs and the Corporation of London on an alteration to the London Plan to formally identify the need for specialist emergency services worker housing as an important planning issue for London.⁸

⁶ LCCI (2016) *Living on the Edge*.

⁷ 56% for police officers, 55% for firefighters and 28% for ambulance paramedics.

⁸ Mayor of London (2016) *An independent review of London's preparedness to respond to a major terrorist incident*, by Lord Toby Harris.

On 25 October 2017, the Mayor published a response to the Lord Harris review that included comment on the adopted LCCI recommendations.⁹ With reference to the review of the London Plan, the progress report said:

"As the draft Plan is being developed, the importance of ensuring sufficient housing at the right price to support the city's resilience will be recognised. The draft Plan will acknowledge that the shortage of affordable housing in the capital is hindering the recruitment and retention of public service workers, including those crucial to the operation of the emergency services [...]."

The Mayor's response concluded that the issue of preparedness to deal with a major incident had been 'resolved'. We understand that was partly arrived at through a questionnaire being sent to members of the standing London Resilience Forum.

While it is welcome that the draft new London Plan, published for consultation as this report goes to print, will note that the shortage of affordable housing in the capital is hindering the recruitment and retention of public service workers - including those crucial to the operation of the emergency services - it is hoped that actual proposals to address this can soon be brought forward by City Hall.

Housing for resilience

LCCI recognises that the emergency services have regularly reviewed and exercised plans to keep London safe and secure in the event of an incident. With the scale of the capital's housing crisis, the capital's pending 'megacity' population of 10 million and feedback we have received from representatives of London's blue light personnel about housing, it is the potential challenges and pressures likely generated from extended resilience scenarios that need to be examined.

A full review - with direct engagement with representatives of London's blue light workers - on London's ability to deal with major event scenarios of a *prolonged duration* if over half of front-line blue light staff have to commute into the city, would be beneficial.

There are documented accounts of pressures on the number of front-line staff being available – such as the London riots in 2011.¹⁰ A full review could be helpful in identifying practical steps to improve recruitment and retention.

"Do they really think a police officer with a starting salary of £21,000 could live in London? I think it is clear recruitment for officers living in London has dropped because officers just can't afford to live there. In terms of flats and housing owned by the police if there is anything left it's minimal or next to nothing. They are moving to Northamptonshire or further away because the properties are a lot cheaper. It is all very well until something happens, and you have to mobilise the force and you find out that half of them don't live within a distance to get to work within a couple of hours."

(Ken Marsh, Chair, Metropolitan Police Federation)

Once the required assessments have been conducted, a better analysis can also be made about the need requirement of emergency services housing in the capital. Although a question of how many homes and where can be informed by a full analysis,¹¹ LCCI believes there is a strong case to provide affordable blue light accommodation within London's boundaries.

Recommendation: The London Assembly should consider a one-off evidence session with representatives of the capital's front-line police, fire and paramedic emergency services personnel, on the potential impacts that a majority of front-line emergency services personnel living outside London might have on preparedness to deal with a major incident of prolonged duration.

Definition

The three blue light emergency services that this report focuses on are those that would respond to a 'major incident' as defined by the London Emergency Services Liaison Panel (LESLP).¹²

The Metropolitan Police Service, London Fire Brigade and London Ambulance Service are designated as 'Category One' Responders under the 2004 Civil Contingencies Act and their front-line staff will be first at the scene during major incidents to provide an operational response. As such, they perform a vital (essential) role in controlling an incident and their collective actions will be fundamental to ensuring business continuity.¹³

⁹ Mayor of London (2017) *Harris Review into London's Preparedness to Respond to A Major Terrorist Incident: Progress report – one year on*.

¹⁰ Although the London Fire Brigade claimed it had enough resources to cope during the London Riots in August 2011, when firefighters battled on average **one blaze every nine minutes for five consecutive days**, a Fire Brigades Union report found that "standard operating procedures were routinely ignored, with fewer than the stipulated number of firefighters and engines being sent to incidents."

¹¹ However, as a very rough indication, if a needs aspiration was for 60 per cent of blue light workers to live inside the capital, housing for 5,400 workers (and in many cases their families) would have to be found. If for example a figure of 70 per cent was required, housing for 9,000 workers must be considered.

¹² London Emergency Services Liaison Panel (2015) *Major Incident Procedure Manual*, version 9.4, p.8.

¹³ GLA (2013) *London Resilience Strategy*, Appendix 1

BROWNSPACE FOR BLUE LIGHTS

During the review of the draft new London Plan, LCCI proposes that consideration is given to using a small portion of 'brownspace' in the 22 per cent of Greater London that is Metropolitan Green Belt for the specific need of affordable housing to rent, for London's blue light emergency services.

There is support for this amongst the capital's business community. Interviews with LCCI members and LCCI commissioned polling by ComRes of more than 500 London business decision makers (representative of London businesses by business size and broad industry sector) found 69 per cent support emergency services housing being built on poor quality land within the capital's Metropolitan Green Belt.



Seven in ten London businesses support building on poor quality land in the London Green Belt specifically for workers like police officers, firefighters and ambulance paramedics.

(ComRes survey for LCCI of 569 London businesses, August-September 2017)

LCCI has coined the term 'brownspace' to define land that is disused or has a poor quality land use.

For the London context, this has been conceptualised as currently vacant, unused or derelict land, and land with a poor quality use, such as car breakers' yards, quarries, gravel pits, and (nearly) full landfill sites. By definition, brownspace also includes regular brownfield land that is vacant, derelict or disused.

This land is currently not contributing much, if at all, to London's needs, whether these are recreational, or related to housing or jobs growth.

Moreover, as will be discussed later in this report, this **brownspace accounts for less than one per cent of the capital's Metropolitan Green Belt**, compared to seven per cent that is covered by golf courses.

Brownspace in London's Green Belt should be *considered* as a location for blue light housing, taking into account factors such as existing infrastructure and access, potential contamination of the sites, location in relation to floodplains and the cost and potential of developing the land; factors that must be taken into account for all housebuilding in London.

The Mayor as 'owner-landlord' of housing for the emergency services

In *Living on the Edge: Housing London's Blue Light emergency services*, LCCI recommended that the Mayor of London should consider assuming an Owner – Landlord position for housing stock for London 'blue light' emergency services workers.¹⁴

LCCI suggests that by specifying a 'blue light housing' need in the draft new London Plan, the Mayor could take an active role in developing the stock needed to house London's emergency service workers.

Conditions could be put on these developments to ensure blue light housing is provided that is genuinely affordable to rent for some front-line staff. LCCI suggest homes are designated as rental in order to ensure they stay in use for their intended purpose.

Notably, given the ongoing considerations about future funding of London, a portfolio of rental homes under GLA control would provide a revenue stream for City Hall.

Recommendation: The Mayor of London should consider assuming an Owner – Landlord position for housing stock for London 'blue light' emergency services workers.

¹⁴LCCI (2016) *Living on the Edge*.

Recommendation: A dedicated unit should be established within the Mayor's Homes for Londoners to act as an intermediary to secure, commission or build homes specifically to rent to emergency services workers.

Mapping brownspace

To make a basic assessment of the potential of London's brownspace, LCCI commissioned mapping consultancy FIND to identify all brownspace in London's Metropolitan Green Belt.

Previously developed land that had already *officially* been identified as **vacant or derelict brownfield** in the Government and Mayor's published databases¹⁵ was analysed as a separate category of brownspace. Whilst part of the Metropolitan Green Belt, construction of starter homes will, under certain circumstances be permitted on existing brownfield sites.¹⁶

FIND identified **other, additional, vacant, unused or derelict sites** as being part of London's brownspace, if they had a clear previous land use other than parkland, farmland and pastures. This includes land that was initially developed for minerals extraction or waste disposal by landfill purposes, as well as previously developed sites and sites with fixed surface structures that are currently vacant, unused or derelict. Some of these sites might, in due course, be included in the updated 'official' brownfield land registers the boroughs are expected to publish by the end of 2017, if considered to fall under the requirements set by government.

The mapping exercise looked beyond those sites, and identified another category of land that LCCI believes constitutes brownspace: **sites with a poor quality land use**. This category includes scrap and car breakers' yards, quarries, gravel and sand pits, large garages and car yards, aggregate recycling sites, storage yards (including builders' yards, car parking and other run-down sites with sheds or workshops), nearly full landfill sites and lorry and transport yards. While these sites have (some) economic function, they are clearly not green field, and any alternative development, including housing, remains severely constrained.

Finally, golf courses were identified as a separate category. Whereas golf courses of course have a place in London, it might be that there is a separate debate to be had, in the context of the draft new London Plan review, on the existence of multiple golf courses (in the Green Belt) alongside a pressing need for housing in some of the outer London boroughs.

Sites located in areas with an environmental designation¹⁷ were taken out of the analysis. These sites are not only environmentally attractive, but also represent the land most important to preserve around London.

Although a detailed analysis of each of the identified brownspace sites is required – to assess for example infrastructure access, contamination, floodplain boundaries – the results are striking (see the map on page 8 and 9).

Findings

In total, 72 brownspace sites were identified, covering 329 hectares – less than one per cent of London's Metropolitan Green Belt – or around 500 football pitches. Most sites had a relatively small size (less than four hectares), but larger sites added up to a total of 255 hectares.

Table 1: Brownspace sites and golf courses identified in the Metropolitan Green Belt in Greater London (excluding sites with environmental designations)

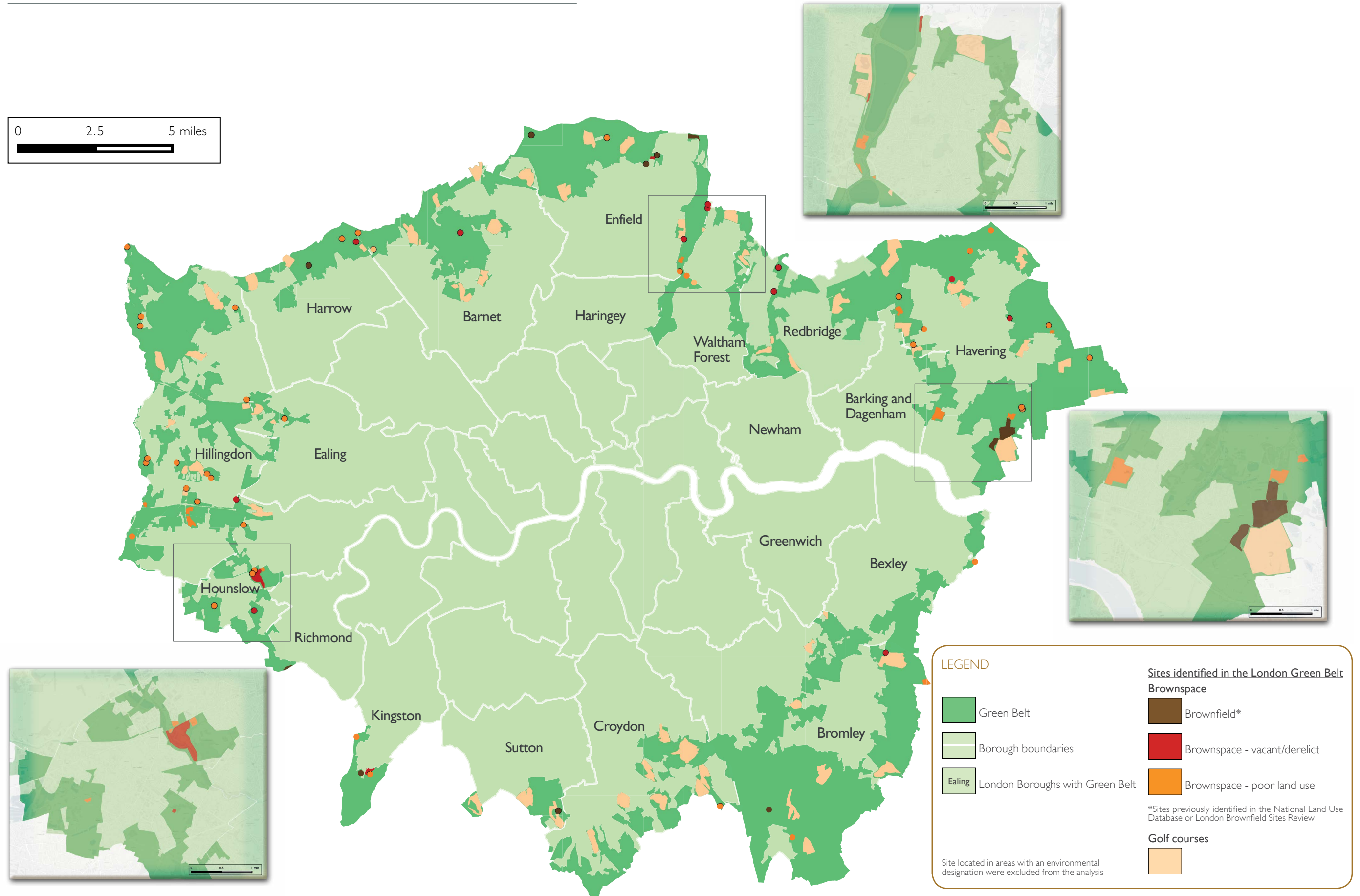
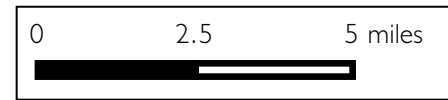
Land type	Small sites (<4 Hectares)		Large sites (>4 hectares)		All sites	
	Total	Hectares	Total	Hectares	Total	Hectares
Brownfield ¹⁸	8	7	4	94	12	101
Brownspace – vacant/disused	13	16	2	48	15	64
Brownspace – poor land use	38	51	7	113	45	164
<i>Total brownspace</i>	<i>59</i>	<i>74</i>	<i>13</i>	<i>255</i>	<i>72</i>	<i>329</i>
Golf courses	3	6	60	2,595	63	2,601

¹⁵ Land identified by the National Land Use Database of Previously Developed Land and the London Brownfield Sites Review.

¹⁶ HM Treasury (2015) *Spending review and autumn statement 2015*, p. 41.

¹⁷ Ancient Woodlands, Areas of Outstanding Natural Beauty, Country Parks, Nature Reserves, National Parks, Parks and Gardens (Historic England), Special Areas of Conservation, Special Protection Areas and Sites of Special Scientific Interest.

¹⁸ Sites previously identified as vacant or derelict brownfield in the National Land Use Database Previously Developed Land and London Brownfield Sites Review.



LEGEND

- Green Belt
- Borough boundaries
- Ealing London Boroughs with Green Belt
- Brownfield*
- Brownspace - vacant/derelict
- Brownspace - poor land use
- Golf courses

Sites identified in the London Green Belt Brownspace

*Sites previously identified in the National Land Use Database or London Brownfield Sites Review

Site located in areas with an environmental designation were excluded from the analysis

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12 vacant or unused sites had previously been identified as brownfield in the National Land Use Database or the London Brownfield Sites Review amounting to 101 hectares. This mostly included small plots, but also a number of larger sites, such as a large piece of vacant land in the north of Enfield (12 hectares), and three former quarry/landfill sites in Havering (13, 17 and 52 hectares respectively).

In addition, 15 other vacant, unused or derelict sites were found, with a total size of 64 hectares. While most of the sites were small, many were located next to existing residential areas, including a larger area in Enfield (four hectares), and an unused site in Havering (two hectares). In addition, two former golf courses, currently laying idle, were included in this category, bordering existing neighbourhoods in Kingston (11 hectares) and Hounslow (37 hectares).

Poor land use was identified in 45 sites, covering a total of 164 hectares. Again, many sites, especially the larger ones, were near to existing neighbourhoods. This included quarries/landfills in Harlington (32 hectares), Rainham (13 hectares) and Chadwell Heath (13 hectares), as well as a range of smaller sites such as car breakers yards, storage areas, car boot sale sites and light industrial yards/workshops dotted around the city.

In comparison, the area covered by the 63 golf courses in London's Green Belt (again, excluding land with environmental designations) was far greater: 2,601 hectares across 13 boroughs - or around 3,500 football pitches. That is seven per cent of the total amount of the capital's Green Belt. Six boroughs had more than five golf courses located in their Metropolitan Green Belt land. A significant portion of the golf courses (20) were located on publicly owned (council) land, encompassing a total of 925 hectares.

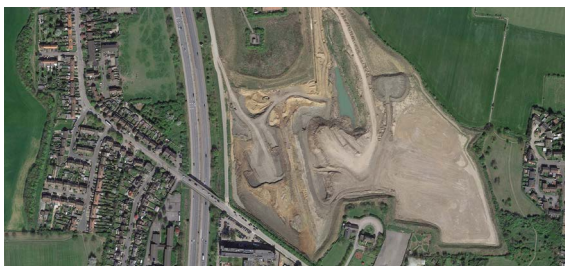
Practical considerations

Only a fraction of the identified sites would be sufficient to accommodate hundreds, even thousands, of dedicated homes for front line blue light workers. This was assessed using the 2016 London Plan sustainable residential quality density matrix which provides guidance on assessing development capacity according to the character of an area and the public transport accessibility rating. This assessment suggested **more than 20,000 homes could be accommodated in a sustainable way on the identified brownspace**,¹⁹ if all sites were used.

Construction would only be suitable and desirable on a portion of the identified brownspace sites. However, with the need requirement for emergency services housing being relatively small (realistically several thousand units, as per the calculations on page 5) – this could well be achieved in sites that are currently not delivering any substantial value to London or its people.

Recommendation: *The Mayor of London should seek to utilise 'brownspace' within the Metropolitan Green Belt in London to support housing for London's emergency services workers – so they can actually live within the capital they serve.*

Satellite images of identified brownspace sites²⁰



¹⁹ Based on the matrix on page 101 of the 2016 London Plan. To be prudent a low public transport accessibility level for suburban sites was assumed, even though that may not apply to all sites. As, in 2016, 56% of permissions were above the recommended London Plan densities (according to the 2016 London Plan Annual Monitoring Report), the higher category of densities was selected to assess the sites' capacity. This resulted in an estimated capacity of 62.5 units per hectare (halfway between the minimum of 50 and maximum of 75 units per hectare for that category).

²⁰ Google, Map data ©2017 Google.

LONDON LAND CONSTRAINTS

Why do we need to look at brownspace at all? In short, it is because we cannot leave a single stone unturned given the scale of the housing challenge.

For decades, housebuilding in London has been unable to keep up with demand,²¹ resulting in the housing challenge faced today. **Just 29,000 homes were built last year, while the need requirement was twice that amount.**²²

There is not one particular issue that is responsible for this 'crisis', as is highlighted in the Government's recent *Housing White Paper*²³ and the Mayor's draft *London Housing Strategy*.²⁴ Indeed, there is a growing consensus that the market as a whole may be 'broken'.²⁵

One thing, however, is clear: limited land supply is a key part of the equation. LCCI's May 2014 report *Getting our House in Order* concluded that liberating more land for development is vital to allowing more homes to be built.²⁶ This remains the case.

The Mayor agrees that more land needs to be put forward for housing, and announced that he will work to increase land supply by supporting more intensive use of London's available land, and by proactively intervening in the land market.²⁷

This will be vital as London must build 66,000 new homes every year²⁸ to meet its growing need and put right years of underinvestment – and that may even be a conservative estimate. With the Government's proposed new methodology, the housing need figure would go up to 72,000 per annum.²⁹

"London's chronic housing shortage is giving rise to a host of challenges for businesses, including the recruitment and retention of staff, and impacts on the productivity of employees. Following years of undersupply of new homes, there is no doubt more houses need to be built across the capital to ensure the city's continued success. And although there are many reforms needed to achieve that, it is clear that allocating more land for development will have to play a key role."

(Mark Collins – Chairman UK Residential, CBRE and Chairman, LCCI Property & Construction Committee)

Finding land for development

Intensification and building on brownfield land* is the preferred option for new developments in the capital.

Definition*

Brownfield land is defined by the National Planning Policy Framework (NPPF) as land that has previously been developed. The NPPF encourages re-use of brownfield land, provided it is not of high environmental value, through limited infilling or partial or complete redevelopment.³⁰

In many reports and government publications the term is used exclusively to describe previously developed land **that may be available for development** – because the land or buildings are now vacant or derelict, have been allocated for development in a Local Plan or have planning permission.³¹

LCCI research in 2014 found that a lack of data on brownfield land was one barrier among many to delivering the housing that London required, which led the Chamber to call for a register of all the capital's brownfield land to be maintained by the Mayor.³²

An illustration of why this was needed was revealed by LCCI FOI requests that resulted in only a few boroughs being able to report they held data on the amount of brownfield they owned.³³

In February 2015, the then Chancellor George Osborne and Mayor Boris Johnson announced the establishment of a London Land Commission to identify public sector land for development,³⁴ with the capital's first register of previously developed land published in January 2016³⁵ - to a somewhat mixed reception.

By the end of 2017, all local authorities in the country will be expected to have set up *brownfield registers* to provide house builders with up-to-date and publicly available information on all brownfield sites available for housing, including some that will be granted 'permission in principle' to be developed.³⁶

²¹ New London Architecture (2015) *New Ideas for Housing London*, background information essay.

²² Mayor of London (2017) *New figures reveal London needs to double rate of homebuilding*, press release 27 October 2017.

²³ DCLG (2017) *Housing White Paper Fixing our broken housing market*.

²⁴ Mayor of London (2017) *London Housing Strategy: Draft for public consultation*.

²⁵ As per the title of the Government's *Housing White Paper*.

²⁶ LCCI (2014) *Ibid*.

²⁷ Mayor of London (2017) *London Housing Strategy*.

²⁸ Mayor of London (2017) *New figures reveal London needs to double rate of homebuilding*.

²⁹ DCLG (2017) *Planning for the right homes in the right places: consultation proposals*.

³⁰ DCLG (2012) *National Planning Policy Framework*, p. 21.

³¹ See for example the Government's *National Land Use Database of Previously Developed Land*.

³² LCCI (2014) *Getting our House in Order*.

³³ LCCI (2015) *Unlocking London's Housing Potential*.

³⁴ HMRC (2015) *Long term economic plan for London announced by Chancellor and Mayor of London*, News story 20 February 2015.

³⁵ Mayor of London (2016) *City Hall produces first register of public land in London*, press release 26 January 2016.

³⁶ DCLG (2016) *First areas to push for faster brownfield land development*, press release 10 March 2016.

The limits of brownfield

While it is becoming easier to identify brownfield sites where development is allowed, a fundamental issue remains: it is doubtful whether the city's needs can be met by solely building on brownfield land.

A recent report by Shelter and QUOD found that two thirds of London's brownfield land is already used for housing, and much of the rest of it is used for vital infrastructure such as hospitals, schools, and transport links, or is already earmarked for development.³⁷ Similarly, an LSE paper reported that in London almost all identified brownfield 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.³⁸

In addition, a recent report by the Adam Smith Institute found that there is only enough brownfield land to accommodate a third of the homes needed in London and the surrounding counties,³⁹ and research by Nathaniel Lichfield and Partners concluded that brownfield sites could accommodate less than half of the homes required up to 2030.⁴⁰

Looking beyond London, Centre for Cities has found that even if every brownfield site in Britain's ten least affordable cities is developed, which is highly unlikely, there is capacity for just 425,000 extra homes – but this falls a third short of the minimum 685,000 homes these cities need over the next ten years.⁴¹

Housing capacity and targets in London

The GLA 2013 Strategic Housing Land Availability Assessment (SHLAA) came up with an estimated capacity figure of just 42,000 new homes per annum on existing sites⁴² – which is well short of the identified need – and even that was not achieved during the past few years.

The 2017 SHLAA has resulted in much higher targets, but LCCI interviews with Councillors and planners in outer London boroughs – where a 97 per cent rise in estimated capacity has been applied – suggest that the assumed capacity is just not there, at least not under the current arrangements.

Councils have been given targets that have not been achieved in many decades, including rises of 165 per cent in Hounslow, 178 per cent in Hillingdon, 179 per cent in Bexley and 223 per cent in Merton.⁴³ And all this is in comparison to the previous targets, not even what was actually achieved – which was generally far less.

For many councils, there appear to be too many constraining factors to deliver their housing targets, including a lack of builders, skills deficiencies in the construction workforce, as well as pressures caused by the Metropolitan Green Belt.

“The Draft London Plan targets are not targets, they are totally unrealistic. They are based on an unproven theory of intensification rather than past trends. There is no evidence to show that the suburbs will intensify at the rate the Mayor thinks. There is neither the developer profit motive nor the development capacity. No thought appears to have been given to the transport infrastructure, local jobs, schools, health services and parkland required to cater for the sudden uplift in new residents.”

(Duncan Clarke, Principal Policy Planner, London Borough of Sutton)

“We need to more than double the current number of net completions in London per annum. But this isn't simply about saying we shall build more houses and setting challenging targets. For a start, these targets need to be deliverable and be based on a realistic assessment of what planning policies can achieve. However innovative any new policies might be, they are unlikely to deliver the step change needed in delivery. The key challenge is about dealing with the barriers to delivery and being realistic about what can be achieved, and plan accordingly.”

(Steve Barton, Strategic Planning Manager, London Borough of Ealing)

“The proposed intensification of suburban areas represents a narrow focus on delivering numbers and loses sight of the fact that we are actually talking about places for people to live. We cannot simply concrete over every spare patch of land to get out of this crisis. There has to be a fundamental shift in the way we look at housing and development. And that is so much more than space standards and densities. It is about place-shaping and communities, green infrastructure and accessibility. Tiny, cramped housing with no green space will only deliver an unhealthy and unhappy population.”

(Cllr Jayne McCoy, Chair of the Housing, Economy and Business Committee, London Borough of Sutton)

Despite ongoing efforts to secure land for housing, there is much evidence to suggest the city will struggle to respond to its growing housing requirements, which will also impact upon the capital's emergency services personnel and resilience. Meanwhile, derelict and poorly used brownspace sites have been identified around the capital that are currently not contributing much, if at all, to London's needs. LCCI believes now is the time to respond to the need for housing for London's blue light personnel, by considering those sites for the construction of new emergency services homes to rent.

³⁷ Shelter and QUOD (2016) *When Brownfield Isn't Enough: Strategic options for London's growth*.

³⁸ LSE (2016) *A 21st Century Metropolitan Green Belt*.

³⁹ Adam Smith Institute (2016) *A garden of one's own: suggestions for development in the metropolitan Green Belt*.

⁴⁰ Nathaniel Lichfield & Partners (2014) *Brownfield Land Solution?*

⁴¹ Centre for Cities (2014) *Delivering Change: Building homes where we need them*.

⁴² Mayor of London (2013) *Strategic Housing Land Availability Assessment*; noting that boroughs should also demonstrate how they seek to exceed their allocated target.

⁴³ Mayor of London (2017) *New figures reveal London needs to double rate of homebuilding*, press release 27 October 2017.

While the Metropolitan Green Belt limits the supply of land available to respond to London's housing needs, Green Belt designation is prohibiting the use of vacant and poorly used brown space sites in the capital for the proposed housing for the emergency services.

The Metropolitan Green Belt was first realised in the 1930s and aims to physically constrain the city's growth. There are 35,180 hectares of designated Green Belt within Greater London (across 19 boroughs), which equates to 22.1 per cent of the capital's land.⁴⁴

The purpose of the Green Belt as set out in the NPPF is 'to prevent urban sprawl by keeping land permanently open'.⁴⁵ Despite its name, Green Belt is not an environmental designation. Although the Government suggests local authorities may want to improve access to their Green Belt, provide recreation opportunities, and improve the appearance of the land, actual use or enjoyment of the Green Belt is principally a side-effect.⁴⁶

Previous mapping exercises have found that just 22 per cent of London's Green Belt is made up of environmentally protected land, parks, and public access land. In contrast, 59 per cent is used for agriculture.⁴⁷

Freedom of information requests

In light of the Green Belt's purpose to constrain development, LCCI issued FOI requests to all London boroughs with Green Belt within their area, to assess whether Green Belt policy had impacted upon their ability to respond effectively to their development needs, in relation to their existing or emerging Local Plans.⁴⁸

This is relevant because a shortage of required housing land can in theory be put forward as one of the 'exceptional circumstances' to modify the Green Belt through the Local Plan process.⁴⁹

The FOI responses confirmed several outer London boroughs had identified Green Belt as a key factor in why they took forward a lower housing target than their objectively assessed housing need. These were mainly boroughs where more than a fifth of the land had been designated Green Belt. Even though several other boroughs only had limited amounts of Green Belt, it was still raised as a relevant constraint to supply.⁵⁰ It should be noted, however, that boroughs' local housing needs may also be accommodated in surrounding local authorities. However, given that the inner London boroughs are constrained by other factors and the local authorities surrounding Greater London have their own Green Belt constraints, meeting needs in surrounding areas is still a major issue.

Green Belt reviews

Where there is not enough land available to meet anticipated demand, Green Belt can be considered, and London boroughs can carry out a Green Belt review. However, in practice, this does not always take place.

FOI responses from London boroughs with Green Belt indicate that several boroughs with an unmet housing need did not review their Green Belt area as part of their Local Plan process. In contrast, a number of boroughs that could meet their housing need (based on intensification, use of brownfield land etc.) did conduct a Green Belt review, and others were planning to conduct a review in the near future.⁵¹

Not all boroughs were keen to review their Green Belt. One did not anticipate 'a Green Belt Review will be prepared unless directed otherwise by the Mayor', and several others only had a very small portion of Green Belt.

It should be noted that Mayoral opposition on the grounds of non-conformity with the London Plan (which currently does not support developments that encroach on the Green Belt) has previously been considered a valid reason by Planning Inspectors not to conduct a review aimed at identifying Green Belt land for housing, and has at times caused London boroughs to refrain from reviewing their Green Belt altogether.⁵²

There is no standard methodology for conducting the reviews, although each has to test for the five purposes of Green Belt set out in the NPPF.⁵³

⁴⁴ DCLG (2017) *Local authority green belt statistics for England: 2016 to 2017*.

⁴⁵ DCLG (2012) *National Planning Policy Framework*, paragraph 79.

⁴⁶ LSE (2016) *A 21st Century Green Belt*.

⁴⁷ London First, Quod and SERC (2015) *The Green Belt: A place for Londoners?*

⁴⁸ 19 FOIs were issued. One borough did not respond to the request. Five others were not able to provide the requested information – either because they had not (yet) assessed the Objectively Assessed Need (OAN) as part of their emerging/existing local plan, and/or because they had not (yet) determined their housing target.

⁴⁹ Although in London, Local Plans have to be in general conformity with the London Plan, and the London Plan only supports growth if it does not encroach on the Green Belt.

⁵⁰ While several Green Belt boroughs (5) had an analysed housing capacity that exceeded their local need as a principle (i.e. they could build more homes than the borough's estimated need at the time), these were mostly boroughs where less than three per cent of the land was covered by the Green Belt designation. In contrast, there were more boroughs (8) where the housing need was higher than the capacity – often far higher – indicating they were struggling to find the land they needed. Four of those eight boroughs reported specifically that the Green Belt had been a key factor in taking forward a lower target, i.e. saying they are unable to build the homes needed – all boroughs where more than 20 per cent of the land was Green Belt. The other four all had less than 20 per cent of their land designated Green Belt, including one where less than three per cent of the land had the designation.

⁵¹ Eight boroughs had conducted a green belt review, and two others reported a review will be conducted soon. This included most of the boroughs that reported a higher needs figure than their local capacity (6/8). Seven boroughs reported they had not done a green belt review, and for two boroughs the required information was not provided – both of them boroughs with more than 20 per cent Green Belt. Most other boroughs with more than 20 per cent Green Belt reported a Green Belt review was planned or had already been conducted (7/8). Boroughs with a lower percentage of Green Belt less often reported a planned or conducted Green Belt review (3/9).

⁵² See for example the *Report on the examination into the Croydon Local Plan – Strategic Policies*, 17 December 2012.

⁵³ LSE (2016) *A 21st Century Metropolitan Green Belt*. The five purposes of Green Belt are: to check unrestricted sprawl, prevent neighbouring towns from merging, assist in safeguarding the countryside from encroachment, preserve the setting of historic towns and assist in urban regeneration, by encouraging recycling of urban land.

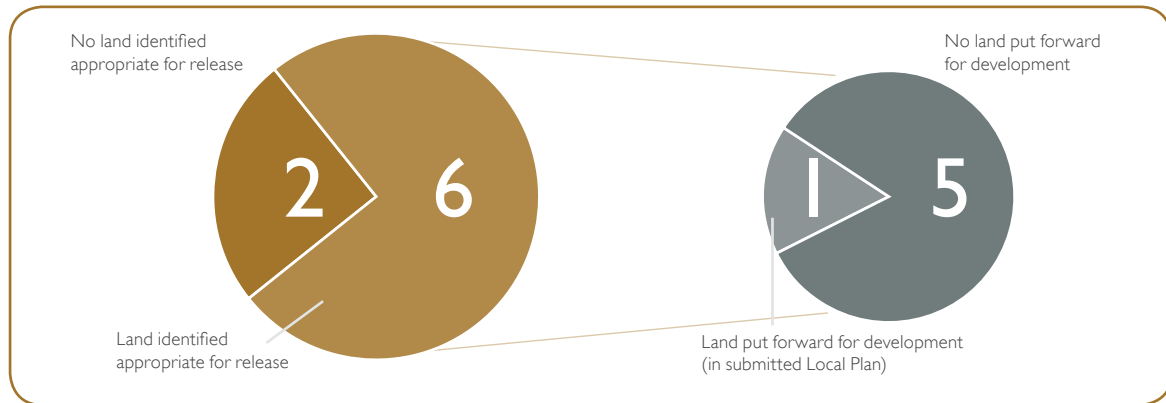
Most of the boroughs that had already conducted a review as part of their Local Plan process had identified sites that no longer complied with any of the purposes of Green Belt, including five with an unmet housing need.

Only one of those proposed to de-designate its unsuitable Green Belt and put it forward for housing (in the submitted Local Plan). However, that Local Plan has yet to be adopted, and de-designation of the site in question may well be opposed (if found to be contrary to the NPPF or London Plan). In contrast, other boroughs did identify potential housing sites that were appropriate for release, but decided not to include them in their (submitted) Local Plan.

“Because of the pressure for the boroughs to provide housing sites and industrial sites, we thought there was an opportunity to carry out a Green Belt review. So, we have gone through the statutory process and have identified parts of our Green Belt that could be de-designated as either Metropolitan Open Land or not Green Belt at all. We think that people should have access to, and use the land, whether that is Green Belt or Metropolitan Open Land, and we have lots of land that isn't accessible at all, and people don't use it. People have this romantic view of the Green Belt but that is often not the reality, and we're in desperate need of housing and industrial units. I think we have to take a mature approach to the Green Belt, and if you go through the statutory process and it doesn't meet the criteria for Green Belt or Metropolitan Open Land, it should be considered for release for housing or commercial use.”

(Cllr Steve Curran, Leader of the Council and Cabinet Member for Corporate Strategy, Planning & Regeneration, London Borough of Hounslow)

Graph 1: FOI responses on the outcomes of Green Belt reviews by London boroughs



Going forward, rather than predetermining that all growth that encroaches on the Green Belt is problematic and undesirable as a matter of principle, the new London Plan could include a specific provision that, in line with the NPPF, in exceptional circumstances boroughs can review their Green Belt boundaries. This may especially be desirable in boroughs where the Objectively Assessed Need for housing exceeds the locally assessed capacity.

A related issue with existing Green Belt reviews is that they are conducted solely at the borough level. The Outer London Commission has expressed concerns that undertaking such reviews may not take full account of strategic considerations, and consequently not fully optimise development outputs. It would therefore be desirable for reviews of the London Green Belt to have a more strategic dimension and coordination, and be a matter for joint work by the Mayor and the relevant boroughs.⁵⁴

Yet, under the present arrangements, Green Belt reviews are limited in scope, and even poor-quality sites in London's Metropolitan Green Belt are not being considered. To enable the use of brownpace sites for London's emergency service housing a new approach will be required.

REVIEWING BROWNSPACE IN THE GREEN BELT FOR BLUE LIGHT HOUSING

Allowing brownpace in the Green Belt to be used for housing for the capital's emergency services is a worthwhile consideration. However, a number of steps are required.

To start with, LCCI recommends that the London Land Commission, whose ongoing purpose is unclear since it published its brownfield register, should build on FIND's mapping exercise by formally identifying all brownpace in the capital's Green Belt.

Recommendation: *The London Land Commission should be tasked with formally identifying all brownpace in Greater London's Metropolitan Green Belt.*

⁵⁴ Outer London Commission (2016) *Seventh Report: Accommodating London's growth*.

In addition, a way needs to be found to enable the identified brownspace in the Green Belt to be utilised for blue light housing. There might, in effect, be two routes to achieve this.

- The brownspace identified by the London Land Commission might be treated as 'official' brownfield and blue light housing be subject to a similar provision to that which will allow starter homes to be built on Green Belt sites.
- Alongside or alternatively, boroughs could consider, proactively, whether identified brownspace plots should be de-designated, as part of a Green Belt boundary review.

To enable this national planning policy may need to be challenged. For example, Green Belt reviews are currently only required to review whether sites still perform any of the five purposes of the Green Belt.

This is problematic. As London is expected to grow and achieve megacity status in 2027 with more than 10 million inhabitants,⁵⁵ the focus should be on how we can use the city's land most effectively, including land within the Green Belt. It is clear that the need for high quality housing, transport, services and business space is rising and will continue to do so.

Yet, as highlighted by our identification of brownspace plots, some of the land classified as Green Belt remains of poor quality and little environmental value, and it has been estimated only 32.5 per cent has public access.⁵⁶ These considerations must, we believe, be assessed as part of any Green Belt review.

Implementing safeguards

LCCI appreciates that building on the Green Belt, including brownspace, is a contentious topic for many Londoners. To address these concerns, there must be clear guiding principles to determine what a Green Belt review should entail, what it is meant for, and what the 'exceptional circumstances' are that would allow Green Belt boundaries to be modified.

There are tried and tested strategies for creating confidence around such sensitive matters. One example is the 1979 binding agreement between West Sussex County Council and the British Airports Authority that prevented the construction of a new runway at Gatwick before 2019 – and thus provided certainty to the residents, and created a situation of trust – but which also established a safeguarded area that restricted development south of the airport leaving an option for future expansion post-2019.⁵⁷

In addition, to ensure that land owners are not incentivised to degrade their land to create new brownspace land, and consequently open it up for development, mechanisms would need to be put in place to avoid such a risk. This might include any reclassification period or process being subject to time restraints or a sunset clause. Moreover, under our own assessment, less than one per cent of Green Belt was identified as 'brownspace'.

LCCI proposes a limited intervention, underpinned by suitable safeguards, and would not anticipate a wholesale reclassification of swaths of 'virgin green field'.

CONCLUSION

As this report goes to print the draft new London Plan has been published for consultation until March 2018 followed by Examination in Public in Autumn 2018. That provides a lengthy period for representations to be made on, and reflection given, to a broad range of matters that may impact on more or less every aspect of living and working in the capital. This is all the more important as London surges toward becoming a megacity of 10 million residents. The current mayoralty should then take decisions to prepare London to house and service the population of 2020 and beyond.

This report has brought a focus upon the situation where the majority of our blue light emergency services workers are now living outside the capital they serve with dedication and professionalism. Whilst the services have robust plans in place to ensure sufficient personnel are available to tackle any incident or emergency, the most reliable way to have sufficient levels of operational staff swiftly deployed and sustained, in the event of a prolonged incident, is to ensure they live in reasonable proximity to their work area.

As the near two-year process of developing and then adopting a new London Plan gets underway, this report proposes that the Mayor and his team focus on two principal considerations:

1. That the new London Plan should identify a 'need' for housing provision for front-line staff in the police, fire and ambulance paramedic services – in a similar way that previous reviews of the London Plan concluded there was a need for housing provision for older people and students.
2. That the volume and location of brownspace land within those London Boroughs that have Metropolitan Green Belt within their confines, be collated by the GLA and the feasibility of its utilisation to build homes for rent by frontline staff in the police, fire and ambulance paramedic services be examined.

This would be a significant undertaking but one that would adequately prepare and enhance the resilience of our capital city as its population increases. At the same time, as the Mayor looks to identify potential future revenue streams, the benefits of the GLA perhaps eventually owning and managing a portfolio of emergency worker homes should be reflected upon – especially as such housing stock would create a valuable asset for City Hall.

⁵⁵ ONS (2016) *Subnational population projections for England*.

⁵⁶ LSE (2016) *A 21st Century Metropolitan Green Belt*.

⁵⁷ Gatwick Airport (2014) *A Second Runway for Gatwick: Our April 2014 Runway Options Consultation*.

