

Initial impressions of the Government White Paper on housing – from Billericay Action Group

The country has a severe national housing problem, especially around affordability and the government has released a White Paper to consult on policy to address these problems.

The 2015 Conservative Party manifesto made clear that solutions to this problem would not be at the cost to the Green Belt which they claimed is “Safe with us”. Despite that hundreds of thousands of homes are planned on Green Belt, areas where the developers can make the greatest profits. This despite London’s Green Belt being a poor choice for housing growth due to the high cost of homes there and infrastructure constraints imposed by the very high rates of commuting to the capital.

Javid: "Green Belt is Sacrosanct"



This short blog looks at the implications of the White Paper for the Green Belt. There are many grey areas that need clarifying; and where this is the case it is worth considering the recommendations of the seemingly anti-GB ‘Local Plan Expert Group’ which inspired this White Paper.

Current Situation – Is the Green Belt dead in all but name?

If a developer wishes to build on Green Belt, local authorities like Basildon are expected to refuse that application, and Basildon are pretty good at this. This arrangement offers very good protection to our countryside.

It’s the long-term housing targets that poses the threat to the countryside. Authorities like Maldon that lie beyond the Green Belt can say where development does and does not take place, just so long as they have a Local Plan in Place which designates enough housing land to meet its Objectively Assessed Needs.

If authorities like Basildon and Brentwood fortunate enough to lie within the Green Belt cannot set Housing Targets lower than Objectively Assessed Needs then they have little or no advantage over authorities like Maldon and therefore the Conservative government’s relatively new planning context, the National Planning Policy Framework (NPPF) has killed the Green Belt in all but name.

The Leader of Brentwood Council, Louise McKinley, recently made a statement saying that OAN must be met even if that means removing land from Green Belt, and we have heard similar mistaken statements from senior Basildon politicians.

The NPPF and associated Guidance are very clear that this is not the case; however if McKinlay and others believe this is the case, or can get away with claiming they believe this, then the Green Belt is dead in all but name and the Government are in breach of their manifesto promises.

Clarification is needed; this White Paper may provide it, the veracity of the Governments manifesto promises hangs on it.

Objectively Assessed ‘Needs’

The term ‘Needs’ is a misnomer, Council’s are obliged to set Objectively Assessed Needs which are higher than local needs.

At present there is no formula, no set or recommended approach to producing an assessment of needs. There are two basic guidelines to follow – that past migration rates must be taken into account and that consideration should

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be given to whether there is a sufficient workforce for the possible scale of the future local economy – this last guideline is intended to be an environmental benefit, intended to prevent unsustainable commuting patterns from workers driving long distances to their jobs.

The consultants hired by the SE Essex authorities to develop their objectively assessed needs interpret this second point to mean they should accelerate migration to provide workers to fill jobs that may arrive in future, with the local unemployed and others largely disregarded in their calculation.

Part of the recommendation of the White Paper is that a standard approach is developed; this seems sensible and desirable, **depending on the approach taken**.

The White Paper says this debate will follow, and the 'Local Plan Expert Group' report makes the welcome recommendation that the absurd approach taken by Basildon and others is made inadmissible. Unfortunately they propose replacing it with an approach partly based on arbitrary bandings based on local house prices, an approach that would see our area have an even larger OAN without, judging by the latest research in the Redfern Report having the desired effect on local house prices.

The White Paper boasts how the Conservative approach protects Green Belt far better than Labour's old regional strategies; however it should be noted that Labour's central targets for SE Essex were much more sustainable, being 40% lower than the current Objectively Assessed Needs and not much higher than Local Needs.

Indeed the current and proposed approach to Objectively Assessed Needs means that, if met, they channel growth **towards** the Green Belt regions rather than away from them.

For Green Belt authorities, the question is less what the Objectively Assessed Needs are, but whether they must be met.

Duty to Co-operate: Seeking to transfer unmet 'Need' to Neighbours

At present the rules are clear that if an Authority's neighbours refuse to accept the excess Needs then the Authority can still go ahead with a Housing Target lower than OAN in order to preserve some or all of its Green Belt.

Very few Green Belt authorities will be able to transfer some their 'Need' to neighbours as these neighbours will have the same Green Belt constraints, and if they're just beyond the Green Belt the neighbours are likely to have the same commuter constraints associated with being close to London. Therefore, this ability to set a sub-OAN Housing Target where neighbours haven't taken the excess, is essential.

The problem is that there have been few Local Authorities who have chosen to protect their Green Belt in this way and none have had a Long-term plan approved on this basis (though a handful have done this on condition of an early review of their Plan).

Castle Point were found to have not tried hard enough to co-operate with their neighbours on housing and other matters – we hope they carry out the appropriate box-ticking and return with a similar plan that protects its Green Belt.

Initial reading of the White Paper has identified two statements regarding the way Duty to Co-operate will work in future:

1. Neighbouring Authorities will be required to prepare a "Statement of Common Ground".
Of itself, this **could** be a good thing clarifying what Local Authorities are required to present to the Planning Inspector.

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We would welcome this if the Statement were able to include statements of what the LAs agreed on, where they agreed to disagree and joint articulation of common challenges – such as commuter infrastructure - this could be very valuable.

The White Paper is unclear on this, the Local Plan Expert group however recommended that if there wasn't agreement on transferring need then a sub-OAN housing target should become invalid. **This recommendation is an existential threat to Green Belt protection.**

2. The White Paper suggests that developing on Green Belt should only be developed as a last resort when other aspects of meeting Housing Needs have been considered.
This is again unclear, but suggests that not meeting housing needs is not an option – **again, this is an existential threat to Green Belt protection.**

Conclusion

The Conservative party manifesto promise hangs on how this White Paper is implemented. The devil is in the detail and the detail isn't there yet; therefore it's the responsibility of local Conservative MPs, John Baron, Steven Metcalfe and Mark Francois, to do all they can to ensure that updates to the NPPF and associated guidance make unequivocally clear that Local Authorities can cite Green Belt, transport or other relevant constraints to meeting Objectively Assessed Needs, even if neighbouring authorities are not willing or able to assist.

If protection is diluted, then Local Authorities in Green Belt will indisputably have little or no advantage over those beyond it – The Green Belt will be confirmed as dead in all but name.

Over to you John!



It's time for our local Conservative MPs to stand up and be counted.