

Waverley Borough Council – Written evidence (TGB0082)

Waverley Borough is situated in SW Surrey at the outer edge of the London Metropolitan Green Belt. The Green Belt covers 60% of the Borough and has played an important role in safeguarding the countryside from encroachment, preserving the setting of the historic towns and villages and encouraging the development of brownfield sites.

The Council recognises the need to review the Green Belt when considering how to meet development needs in its new Local Plan (under preparation for the period to 2043). However, the proposed Standard Method for assessing local housing need would create a major problem, giving an unrealistic and unattainable figure that risks undermining the long-standing approach to the protecting the Green Belt. We have explained this in answering your specific questions relating to Grey Belt land. We would respectfully suggest that the Government's proposal for a revised Standard Method warrants an inquiry in its own right, as it will have major consequences for the operation of the planning system in many rural authorities.

The Council's response to the questions in the Committee's call for evidence are set out below.

1) What is your assessment of the Government's definition of "Grey Belt"?

a) What is your understanding of what makes a "limited contribution" to achieving the purposes of the Green Belt?

The definition of Grey Belt needs to be clearer for the purposes of plan-making and decision-taking. It is not clear what constitutes a "limited contribution to the five Green Belt purposes". The Council undertook a review of its Green Belt to ascertain if it could meet local development needs for Local Plan Part 1 (adopted 2018). This concluded that some Green Belt parcels contribute strongly to some of the purposes of the Green Belt but were weaker on others. Clear guidelines will be required to enable the Council to weigh up the overall contribution of a site to Green Belt purposes, helping to speed up decisions and reduce appeals and legal challenges.

2) Do you think the Government's Grey Belt proposals will contribute to delivering new homes across the country and, if so, how quickly?

a) How many new homes could be built on Grey Belt land?

There will no doubt be scope to identify Grey Belt land at the edge of major urban areas where this is not subject to significant environmental constraints. However, the potential to deliver new homes on Grey Belt land will be limited in Waverley because most Green Belt is also covered by national designations that are, quite rightly, excluded from the proposed definition of Grey Belt. More than 88% of Waverley's Green Belt is covered by areas and the assets of particular importance listed in NPPF footnote 7

and this could increase to over 93% under Natural England's current proposal to extend the Surrey Hills National Landscape. The Council will review the remaining 7-12% of the Green Belt in preparing the Local Plan, but it is likely that most of this land will make more than a limited contribution to the five Green Belt purposes identified in para 143 (proposed 140) of the NPPF.

b) Will the creation of a new Grey Belt category be a better way to deliver new homes in the Green Belt than the existing processes for redesignating Green Belt land?

The concept of Grey Belt serves to highlight that not all designated Green Belt is of the same quality or makes the same contribution to the purposes set out in the NPPF. However, it has limited relevance to Waverley given the extent of other designations. The Council considers that the existing mechanism of reviewing Green Belt through the Local Plan, coupled with the ability to consider "very special circumstances" in relation to planning applications, are better than introducing a new Grey Belt designation which, unless clarified, will encourage speculative planning applications and appeals that will divert scarce resources from the preferred plan-led approach.

3) Do the current proposals for identifying Grey Belt land provide local planning authorities with sufficient scope to meet their housing targets and the needs of local communities?

No. Aside from the lack of Grey Belt land in Waverley, there is a fundamental problem with the proposed Standard Method as the basis for establishing local housing need.

The affordability uplift in the proposed Standard Method increases the assessed need in Waverley by 203% on top of the baseline 0.8% of existing stock. This results in an unrealistic assessment of a need for 1,374 dwellings pa, which would require over 27,000 homes to be built in the next 20 years (3.4 times more than in the last 20 years).

Sustainably located sites do not exist for this scale of development in a largely rural borough that is heavily constrained by national and international designations. Moreover, demographic and economic analysis prepared for the Council (Iceni, September 2024) concludes that there is no evidence of a need for anything like this level of delivery. Net migration would need to be at unprecedented levels, increasing the population by around 50% over the next 20 years. The labour force would grow by around 35,000 people, while the most credible economic baseline forecast (Experian) is for only 6,500 new jobs, suggesting an unsustainable growth in out-commuting.

Part of the problem is that the Standard Method does not reflect the market reality in a commuter area such as Waverley. The median income of our residents is 40% higher than income associated with jobs within the Borough (used in the Standard Method) due to the ease of commuting to better paid jobs. If residence-based incomes were used instead of

workplace-based incomes, the affordability uplift for Waverley arising from the new Standard Method would be 125% rather than 203%. The House of Commons Levelling Up, Housing and Communities Select Committee¹ has recognised this issue and recommended that *"for specific local authorities the Government should consider using residence-based earnings to ensure the housing targets accurately reflect local circumstances"*.

Another, more fundamental flaw is that the Standard Method gives an assessment of local housing need without any spatial refinement to reflect factors such as economic growth and regeneration needs, infrastructure capacity, nationally recognised environmental designations, or opportunities such as the potential locations of New Towns. We are aware that the Council can seek to justify a different housing number in the Local Plan based on local constraints on land and delivery. However, this will take time, as the Council will need to demonstrate that it has made every effort to allocate land in line with the need assessed by the standard method, before it can justify a more realistic housing requirement. Far from giving certainty, the proposed Standard Method housing number will guarantee that the Council is unable to demonstrate a 5-year housing land supply, encouraging speculative applications and appeals, and ensuring that the Local Plan process will be a lengthy battle to justify a more appropriate housing requirement.

a) Are there any strategic considerations concerning the designation and development of Grey Belt land that may require an unusual degree of collaboration between neighbouring local authorities and, if so, what are they and how is that collaboration to be achieved?

The Council welcomes the fact that review and alteration of Green Belt boundaries should only be done through plans. In our view this necessitates a consistent and robust strategic approach, carried out in collaboration with other local authorities across an appropriate geography. We consider that the most sustainable places to release Green Belt are likely to be at the inner edge adjacent to major built up areas and not in the rural extremities like Waverley. In advance of formal strategic planning arrangements, Councils will require clear guidance on the methodology to be used and the approach to satisfying the duty to cooperate.

4) Do you think the proposed sequential test for allocating land in the Green Belt for development will provide sufficient protection for "high quality" Green Belt land whilst still ensuring sufficient land is released for new housing? [1]

a) The current NPPF designates specific categories of land as "areas of particular importance" which cannot be developed and would be excluded from being considered Grey Belt land. Should the Government review which areas receive this designation?

¹ <https://committees.parliament.uk/publications/6180/documents/80920/default/>

No. We support the exclusion of the areas and assets of particular importance listed in NPPF footnote 7 from the definition of Green Belt land (we would support its expansion to include land identified as SANG that is required to mitigate impacts in perpetuity).

However, this in itself does not give sufficient protection to “high quality” Green Belt land. The consequence of the proposed Standard Method identifying an unrealistic housing need is that most Green Belt authorities are unlikely to be able to demonstrate a 5-year supply of deliverable housing land. The “exceptional circumstances” referred to in proposed NPPF para 142 will be the norm rather than an exception, and Councils will need to review and alter the Green Belt to meet the assessed development need in full, “unless the review provides clear evidence that such alterations would fundamentally undermine the function of the Green Belt across the area of the plan as a whole”. By virtue of proposed NPPF para 152, it will also mean that housing, commercial and other development in the Green Belt should not be regarded as inappropriate where it utilises grey belt land in sustainable locations, provides certain contributions (the ‘golden rules’), and would not fundamentally undermine the function of the Green Belt across the area of the plan as a whole.

It is essential for plan-makers to have clearer guidance on how to assess whether plan alterations would “fundamentally undermine the function of the Green Belt across the area of the plan as a whole”. Without this, and a more realistic assessment of local housing need, the sequential approach will fail to protect higher quality Green Belt land. The Council would need to rely on environmental designations rather than Green Belt policy to maintain protection for these areas.

5) What infrastructure and local amenities are necessary to ensure that a Grey Belt housing development is a good place to live?

a) Should the identification of Grey Belt land be influenced by the proximity of public transport amenities or other services, or is this better handled through individual planning applications?

The identification of Grey Belt land should be related to the contribution of land to the purposes of the Green Belt (as proposed). Consideration of whether identified Grey Belt land is in a sustainable location is a separate matter, which should be influenced by the proximity of public transport, and other amenities and services. National guidance should be provided to ensure a consistent approach, for example utilising the 20 minute neighbourhood concept.

b) How can identified Grey Belt sites be connected with social infrastructure such as schools and health facilities?

If Grey Belt sites are sustainably located, they should already be well located in relation to existing social infrastructure and services. Developments should provide convenient and safe routes to these facilities by foot or bicycle. They should provide on-site infrastructure (dependent on scale) and contribute to necessary improvements to wider infrastructure. Consideration needs to be given to how these will be funded given that Community Infrastructure Levy (CIL) contributions will be lower on

developments on land released from the Green Belt due to the higher affordable housing requirements (at least 50%) which will qualify for CIL relief.

6) The Government has pointed to disused petrol stations and car parks as instances of Grey Belt land. Are any additional special measures needed to support the potential decontamination of Grey Belt land, beyond those that are currently available?

Disused petrol stations and car parks are a mischaracterisation of what the majority of "Grey Belt" land will be, which is countryside that makes a limited contribution to the purposes of the Green Belt. In any event, these examples of previously developed land are scarce in a rural area such as Waverley and, where they become available in sustainable locations, will generally be considered favourably for redevelopment under existing policies. Special measures may be needed to support decontamination if sites could make a significant contribution to meeting local housing need. However, this should not be at the expense of public funding available to remediate previously developed land within existing settlements, or sites allocated in existing Local Plans.

7) The government has proposed a 50 per cent affordable housing target on Grey Belt sites. Is the current approach to viability assessments and s106 agreements able to deliver this?

The Council supports this golden rule as the delivery of affordable homes is a key priority for the Borough. The Government should benchmark land values as a low multiplier of existing use value to ensure that a large proportion of land value uplift arising from a site being released from the Green Belt is captured to support the delivery of infrastructure, affordable housing, and other community benefits.

It is important that the 50% rule does not apply to rural exception schemes which should maintain 100% affordable housing to reflect the exceptional circumstances in releasing the land for residential development.

8) In order to facilitate Grey Belt development, what flexibility in the process could be introduced without compromising the Government's overall housebuilding objectives?

No comment

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