

## Green belts

- *Is the existing policy approach to green belts fit for purpose? What aspects need to change?*

The policy approach should be strengthened and clarified - this will involve more detail being added not less.

The intrinsic value of having open, green spaces around conurbations should be better recognised - including ecosystems services, food production, biodiversity, health and well being and recreation, active travel and climate change mitigation and adaptation. Most areas of green belt provide some of these benefits already but there is no doubt that these benefits could be **enhanced** if policy required it. Climate Change and Covid-19 make this approach even more necessary.

Land banking of green belt where there is a strong presumption against development should be ended.

- *What should the role of green belts be in terms of ensuring that spatial strategies can help climate change mitigation – e.g. water management and storage/floodplain capacity/carbon sequestration?*

Green belts have potential to help mitigate climate change and should also be part of a very much needed National Nature Network to help counter the equally concerning biodiversity crisis. Sites for nature need to be connected, not just 'islands'.

- *How prescriptive should NPF4 be in identifying the issues for planning authorities to consider when designating green belts in local development plans and determining planning applications?*

Many instances of development on supposedly protected green belt land have gained permission on Appeal, against the LDP policy and Local Authority's decision, not because it was a superb design in the perfect location but purely because the local authority is felt to have not met its housing target, the local plan is therefore considered out of date and a clause in SPP says in such situations the balance of the planning application decision is tilted in favour of 'sustainable development'. There seems to be no real test in this situation of sustainability or public interest, just decisions favouring commercial development. This is a ludicrous situation that needs to be rectified. It makes a mockery of having a plan-led planning system and leads to it being worthwhile for some property lobbyists to put huge effort and resources in trying to discredit or change LA housing targets at every turn, rather than developers focusing effort on the best placemaking possible. NPF4 needs to sort this out one way or another - either by better defining the 'sustainable development' clause, by removing the link between housing supply and plans being deemed 'out of date' (especially over 10-year spans) or by making it crucial for development to **only** be permitted on allocated land ie a properly plan-led system.

- *Should NPF4 / regional spatial strategies have a role in identifying green belts? Or should this be left to local development plans?*

NPF4 could identify or require green belts around every city or town over a certain size in order to encourage the redevelopment of vacant and derelict 'brownfield' sites rather than green field sites. Given the Climate and Biodiversity crises and now the COVID-19 pandemic we need to value our green spaces near centres of populations far more than we do, and to recognise that it's a finite resource with the potential for multiple benefits - some of which are of extra value compared to other areas of countryside, because of proximity to people.

### Vacant and Derelict Land

*What more can NPF4 do to support and encourage appropriate opportunities for the redevelopment of vacant and derelict land?*

Make it policy that there should be a Brownfield first policy for development. SLC research has shown what a blight on communities VDL is, so as part of a move to a 'wellbeing economy' we should prioritise this. As well as all the environmental, biodiversity and climate reasons for converting existing buildings and retaining as much Greenfield land as we can.

*Can more be done to ensure that the re-use or re-development of brownfield land is considered before new development takes place on greenfield sites? Yes, and not just considered, done - see Edinburgh's proposals for using brownfield land in their Choices for 2030 consultation.*

*Are there circumstances where it would be appropriate for developers to be asked to provide evidence that development on brownfield land is not viable? Yes, are there any circumstances where it isn't appropriate?*

### Housing

*Is the existing policy fit for purpose?*

No. We don't seem to be building the type of housing we should be prioritising ie social and affordable housing that is net-zero compatible.

*What evidence is there to show that changes are required?*

Need, fuel-poverty, etc

*Should tenure be made a more explicit part of housing land allocations? Not sure, but you need to increase design quality and increase density on big developments (see RIBA Stirling prize winner 2019)\_*

*What factors should be taken into account in setting the contribution to affordable housing as a percentage of total homes being delivered? What is needed! Maybe just give permission for the type of homes most needed - not the ones that generate most profit for private companies. Why not tweak the system to get building contractors to bid for what the local authority or government actually wants built, in the most sustainable locations?*