

<b>ORGANISATION</b>	<b>LONDON FIRST</b>
<b>ID</b>	<b>1588</b>
<b>MATTER</b>	<b>M11 OVERALL SPATIAL DEVELOPMENT STRATEGY</b>

**M11. Is the strategic approach to accommodating development needs within London justified and consistent with national policy? In particular:**

**a) Is the focus on the Central Activities Zone, Town Centres, Opportunity Areas and through the intensification of existing built-up areas in inner and outer London whilst protecting the Green Belt and Metropolitan Open Land justified and would it be effective in meeting identified needs and achieving sustainable development?**

1. London First supports the infrastructure-led growth strategy that focuses intensification in accessible areas, including the CAZ, Town Centres and Opportunity Areas (OAs). OAs, in particular, have the potential to make a significant contribution towards meeting London's housing and employment targets. We welcome the identification of new OAs in the draft Plan which will contribute to London's capacity to deliver new homes and jobs. We also support the draft Plan's recognition of the important role of town centres as primary locations for commercial activity beyond the CAZ and the role that they can play in increasing housing delivery.
2. However, this is largely the strategic approach set out in the current Plan, which has a housing target of 42,000 net new homes per annum. The draft Plan introduces a 55% increase to deliver 65,000 net new homes per annum. The only step change in the draft Plan strategy compared to the current Plan, to increase housing land supply, is the contribution of small sites (38% of the total target) and the expectations around intensification of industrial land. We remain concerned about the draft Plan's reliance on these two sources of supply to increase delivery for the reasons set out in our written statement for M10. On small sites in particular, the draft Plan assumes that a rate of delivery and level of density can be achieved which far exceeds the rates or densities that have historically been delivered on small sites, and this is not justified by adequate evidence.
3. In conclusion, the focus on these locations is justified in principle. However, we remain deeply concerned that the factors described in our statement for M10, namely an over reliance on small sites, rigid protection of the Green Belt, intensification of industrial land and the design-led approach to density, will

contribute to the Plan's inability to deliver the level of development that London needs. This will undermine the delivery of the Good Growth objectives and mean that London cannot deliver the homes and jobs that it needs to house London's growing population, fill the housing backlog and ensure it remains economically competitive. In other words, the draft Plan will not achieve sustainable development.

**b) Alternatively, should some of London's development needs be met through reviewing Green Belt and Metropolitan Open Land in London?**

1. In accordance with national planning guidance, there may be some exceptional circumstances where a borough needs to review its Green Belt boundary to meet its objectively assessed housing need or to deliver a better overall spatial strategy for London.
2. In these circumstances, London First believes that the Plan should not rule out a review of London's Green Belt. Whilst it is acknowledged that the Mayor has made a political commitment to protect the Green Belt, the fact remains that the draft Plan (i.e. Policy G2) is inconsistent with national policy and therefore unsound.
3. The vast majority of the Metropolitan Green Belt (94%) is outside London, yet the fraction of Green Belt that is within London's boundary accounts for 22% of land in the capital. Green Belt is not designated to protect valuable landscapes: it exists only to contain sprawl. The high-quality areas of the Green Belt are separately protected by other designations – for example, as nature reserves or sports fields – and serve an important role in London's quality of life. Many other areas are of low quality.
4. Carefully planned Green Belt releases, consistent with national policy, can allow the urban boundary to change in a controlled way, without unsustainable sprawl. Since London's population began growing again in the 1990s, it has consistently proved impossible to meet the needs of that growth on brownfield land alone. In the face of this pressure from growth, a policy that resists all Green Belt alterations, even in exceptional circumstances, will have the unintended consequence of forcing development onto more important urban open spaces or employment land, undermining the quality of urban areas and the wider objectives of the London Plan as a whole, including any realistic prospect of meeting the Plan's housing targets.
5. The Mayor should therefore leave boroughs to review their Green Belt boundary if they need to, through their Local Plan process and in accordance with NPPF guidance. The boroughs should have autonomy to assess the land within their Green Belt that is close to existing or future transport nodes and that is of poor environmental or civic value to consider how it could better serve London's needs by supporting sustainable, high-quality, well-designed

residential development that incorporates high-quality, accessible green space. Boroughs would be subject to the statutory requirements to provide a robust evidence base and justify any changes to Green Belt policy through the local plan examination process.

6. Furthermore, boroughs should also be able to facilitate land swaps to ensure that land-use distribution is optimised in the most sustainable way and results in a better spatial strategy outcome. Policy G2, as currently worded in the draft Plan, would not even allow a land swap that resulted in no net loss of Green Belt.
7. In conclusion, London First submits that the Plan should not rule out a review of London's Green Belt, and Policy G2 in the draft Plan should be revised to be consistent with NPPF1 and NPPF2.