

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M65 GREEN BELT AND METROPOLITAN OPEN LAND

**M65. Would Policies G2 and G3 provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the policies and detailed criteria justified and necessary and would they provide an effective basis for development management? In particular:**

**a) Is Policy G2 on London's Green Belt consistent with national policy and, if not, is this justified?**

1. Policy G2B states explicitly that changes to Green Belt boundary will not be supported. This is not consistent with national policy. NPPF1 (2012) states, *"Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan"* (paragraph 83). Similarly, NPPF2 (2018) states, *"Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans"*.
2. In accordance with national planning guidance, and given the housing pressures London faces, there are likely to be exceptional circumstances where a borough should review its Green Belt boundary to meet its objectively assessed housing need or to deliver a better overall spatial strategy for London.
3. In these circumstances, London First believes that the Plan should not rule out a review of London's Green Belt. Whilst the Mayor has made a political commitment to protect the Green Belt, notwithstanding his political commitments to build more homes, the draft Plan's Policy G2 is inconsistent with national policy as it makes no reference to "exceptional circumstances" and, therefore, it is unsound.
4. Almost all of the Metropolitan Green Belt (94%) is outside London, yet the fraction of Green Belt 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 urban sprawl.
5. 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, which are not subject to such protections, are of poor quality; they are not enjoyed by the public, but have good public transport accessibility, and could provide much-needed new homes as well as amenity space for the benefit of the wider community. Indeed, 42% of non-environmentally protected Green Belt land is within 2km of a rail or tube station. Fourteen boroughs have more land designated as Green Belt than that which is built on for housing.

6. London First supports the continued protection of the Green Belt where it serves a public purpose; however, we believe that carefully planned Green Belt releases, through the plan process and in accordance 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 1980s, it has proved impossible to meet the housing needs of that growth on brownfield land alone. In the face of this increasing cumulative pressure from population growth, a policy that resists all Green Belt alterations, even in exceptional circumstances, will have the consequence of forcing development onto other sources of land supply, possibly including more important urban open spaces or employment land. This approach risks 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.
7. The Mayor should not seek to prevent boroughs from considering opportunities to release poor-quality Green Belt to deliver new homes; indeed, the Mayor should be encouraging the boroughs to review their Green Belt boundary where it will support the delivery of their housing targets and does not result in the loss of areas protected by landscape or civic designations, through their Local Plan process and in accordance with NPPF guidance.
8. The boroughs should have autonomy to assess the land within their Green Belt that is close to existing or future transport nodes and is of poor environmental and civic value to consider how it could better serve London's needs in supporting sustainable, high-quality, well-designed residential development that incorporates high-quality, publicly accessible green space. Boroughs would be subject to the statutory requirements to provide a robust evidence base and justify any changes to Green Belt boundary through the Local Plan examination process.
9. More specifically, 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. The current inflexible wording of Policy G2 in the draft Plan would not even permit a land swap that resulted in no net loss of Green Belt.
10. London First has expressed grave reservations about the deliverability of the overall Spatial Development Strategy and the ability of the draft Plan to meet its development targets (reference: London First statements submitted pursuant to M10–M12). This rigid approach to Green Belt is a key risk in that regard, along with the over-reliance on small sites to meet 38% of London's housing need, the realistic contribution that intensification of industrial land can

make, and the interpretation of the design-led approach to density by the boroughs that are resistant to growth.

11. When the Inspector reported on the Examination into the Further Alterations to the London Plan (FALP, adopted in 2016), he raised concerns about the ability of the FALP to meet its housing target (42,000 homes against an identified need of 49,000) and suggested an immediate review of the Plan. The Inspector questioned whether the review would need to go beyond the current approach set out in the FALP, and specifically queried whether further consideration was needed of the approach to the Green Belt and MOL. However, the draft Plan now under examination proposes to significantly increase London's housing target, but with reduced land supply and a more restrictive approach to Green Belt and MOL.
12. 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. To make G2 consistent with national policy we propose that it should be amended as follows:

**A** *The Green Belt should be protected from inappropriate development:*

- 1) *development proposals that would harm the Green Belt should be refused **other than in very special circumstances**.*
- 2) *the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported **where it does not conflict with the purposes of the Green Belt (or where there are very special circumstances for doing so)***

**B** *The extension of the Green Belt will be supported, **where appropriate, as part of an evidence-based review**. Its de-designation will not be supported, **other than in exceptional circumstances through the preparation or review of the Local Plan**.*

**b) Is the 'swapping' of Metropolitan Open Land (MOL) referred to in paragraph 8.3.2 and allowed for by Policy G3 AC justified? Do the other detailed criteria provide sufficient clarity about inappropriate development and how any boundary alterations should proceed? Should parts of the River Thames be designated as MOL?**

1. As stated in (7) above, in respect of question (a) in relation to the Green Belt, the boroughs should also be able to facilitate land swaps of MOL through the Local Plan process to ensure that land-use distribution is optimised in the most sustainable way.
2. It is submitted that Policy G3 on MOL should be amended as follows:

**A** *Metropolitan Open Land (MOL) should be protected from inappropriate development:*

1) *development proposals that would harm MOL should be refused, other than in exceptional circumstances or where such development provides the types of leisure, recreation, sport, arts or cultural facilities envisaged by policy G3.*

3. It is not necessary to designate parts of the River Thames as MOL. The existing Thames Policy Area designations already serve to protect the River Thames from inappropriate development.