

THE “STRONGEST PROTECTION”?

Green Belt and
Metropolitan Open Land
in Greater London:
the real story

March 2016



SUMMARY

Green Belt and Metropolitan Open Land in Greater London enjoy the highest level of protection from development. These protections, put in place many years ago, have ensured that London has not sprawled into the countryside, that derelict areas have been used for development instead of green field sites, and that Londoners have access to green spaces within and close to London.

National and London planning documents state that ‘**the strongest protection**’ should be given to Green Belt and Metropolitan Open Land and that ‘great importance’ is attached to land protections. Politicians of all parties pledge continued support for land protections.

But CPRE London is currently aware of 51 protected sites across London under threat from development. These include parks, recreation grounds and sports fields. And recently there has been a sharp increase in planning permissions on Green Belt and Metropolitan Open Land.

There are four main reasons for this.

- ▶ The 2012 reform of the planning system introduced conflicting objectives such that protections are weakened in the face of apparently more pressing concerns. Related to this, local constraints are not recognised when housing targets are set.
- ▶ The Government’s Education Funding Agency is involved with seeking out and acquiring protected sites to locate new schools.
- ▶ These two combine to send the wrong messages to landowners and developers leading to speculative planning applications and land sales.
- ▶ Land is left to become derelict and this often leads to its being regarded as having little value.

CPRE London believes urgent action is now needed to halt the loss of London’s protected green spaces

- ▶ Politicians should halt the loss of London’s precious Green Belt and Metropolitan Open Land, calling an immediate stop to the current sacrifice of parks, playing fields and recreation grounds for development
- ▶ Clear signals are needed from the Mayor and the Government to halt speculative planning applications on, and sales of, protected land
- ▶ The government’s Education Funding Agency must cease seeking out and acquiring protected sites in London for free schools
- ▶ There is no need to build on London’s precious Green Belt and Metropolitan Open Land. Alternatives exist. Use these instead.
- ▶ Local constraints should be recognised when housing targets are set
- ▶ We want to see provisions requiring councils to plan to enhance protected green spaces given more weighting by councils and more support from the Mayor, to ensure sites are well used and do not become derelict

CONTENTS

1	Introduction to protected green space in London	4
2	The purposes of Green Belt and Metropolitan Open Land	6
3	London Boroughs, the London Mayor and national government: their role in protecting land	8
4	The benefits of Green Belt and Metropolitan Open Land	10
5	Conflicting interests and the future of land protection	11
6	Recent increase in threats to Green Belt and Metropolitan Open Land in Greater London	12
7	Parks, recreation grounds, sports grounds: an analysis of what is under threat	14
8	Sites currently under threat in Greater London	15
9	Reasons why threats to protected land are on the increase	21
10	Halting threats to London’s protected green spaces	24
	Afterword: London, its Green Belt, and beyond	25

1. INTRODUCTION TO PROTECTED GREEN SPACE IN LONDON

Protected green space and what it means

There are many green spaces in Greater London which are protected from development, meaning they are protected from being built on. It can also mean that any development next to the land is constrained to ensure the land still feels open.

These green spaces are protected by legal designations which have different names: in Greater London the majority are designated as *Green Belt* or *Metropolitan Open Land*. These are both afforded the highest level of protection from development – meaning that they should never be built on except in exceptional circumstances. Other designations with a lower level of protection also exist, for example *Urban Open Space*.

This focus of this report is Green Belt and Metropolitan Open Land.

The extent of Green Belt within the Greater London area

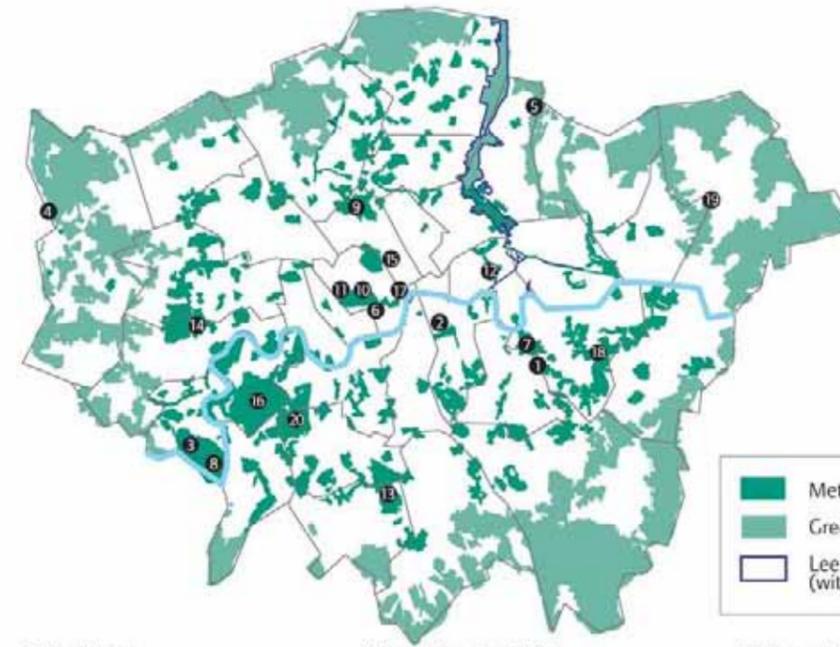
London's Green Belt is one of 14 Green Belts in England¹ covering a total of 1,638,610 hectares or 13% of England's land area. It is also known as the *Metropolitan Green Belt* and is a permanent area of

open land that surrounds the city. Most of it is outside Greater London, falling in the surrounding counties, but much falls within Greater London. The whole of London's Green Belt measures 514,060 hectares of which 35,190 hectares², or around 7%, is in Greater London. It is this 7% which is the subject of this report.



MAP 1

This map shows London's Green Belt most of which is outside of Greater London. Only 7% falls within the Greater London boundary



- 1 Blackheath
- 2 Burgess Park
- 3 Bushy Park (royal park)
- 4 Colne Valley Regional Park
- 5 Epping Forest
- 6 Green Park (royal park)
- 7 Greenwich Park (royal park)
- 8 Hampton Court Park
- 9 Hampstead Heath
- 10 Hyde Park (royal park)
- 11 Kensington Gardens (royal park)
- 12 Mile End Park
- 13 Mitcham Common
- 14 Osterley Park
- 15 Regents Park (royal park)
- 16 Richmond Park (royal park)
- 17 St. James's Park (royal park)
- 18 SE London Green Chain
- 19 Thames Chase Community Forest
- 20 Wimbledon Common

©Crown copyright. All rights reserved. Greater London Authority 100032379 (2008) www.london.gov.uk/thelondonplan

MAP 2

This map shows some of the larger Metropolitan Open Land sites within Greater London, also identifying the many parks and commons which are part of it

The extent of Metropolitan Open Land within the Greater London area

Metropolitan Open Land is afforded the same level of protection as Green Belt. It differs from Green Belt in that all of it is within Greater London. There is a wide range of sites within London's boroughs designated as Metropolitan Open Land. No data exists for the

total amount of Metropolitan Open Land but the Greenspace Information for Greater London (GiGL) hopes to be able to create such a dataset over the coming year. Many of London's parks, playing fields, recreation grounds and open fields are Metropolitan Open Land but there are also many small pieces of Metropolitan Open Land all over Greater London.

LONDON'S GREEN BELT TIMELINE

1890	1919	1926	1929	1935	1938	1943	1947	1955	1962	1988&1998	2009	2011	2012	2014
Ebenezer Howard's vision of Garden Cities outlines a principle of "always preserving a belt of country around our cities"	Town and Country Planning Association calls for towns to be surrounded by a rural belt	Formation of CPRE, one of whose earliest campaigns was against urban sprawl	Raymond Unwin, chief planner for Greater London Regional Planning Committee, proposes a 'green girdle' around London to compensate for a deficiency of green spaces in the capital	London County Council announces a 'Green Belt loans scheme' allowing local authorities to locally define the function of the land. 11,400 ha of land was purchased by local authorities	The Green Belt (London & home counties) Act gives permanent protection to London's Green Belt land	Patrick Abercrombie's <i>County of London Plan</i> defines the Green Belt around London	The Town and Country Planning Act enables local authorities to designate and protect areas such as the Green Belt through local development plans, without needing to purchase the land	Duncan Sandys, Housing minister, encourages local authorities to define Green Belt. Circular 42/55 outlines three functions: to check urban growth; prevent neighbouring settlements from merging; to preserve the special character of a town	'The Green Belts' government publication gives a presumption against Green Belt development, although development that doesn't interfere with the 'open character' of the land may be permissible. Circular 14/84 gives advice for detailing boundaries in local plans	Policy Planning Guidance (PPG) 2 Green Belts states; 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness'. Circular 43/55 defines five green belt functions	The Town and Country Planning (Consultation) Direction requires planning applications to be referred to the Secretary of State where a local authority proposes inappropriate development on Green Belt, if the development consists of buildings 1000 m ² or more or would significantly impact openness	The National Planning Policy Framework (NPPF) retains the five functions of the Green Belt from Circular 43/55	The London Plan establishes Policy 7.16 on Green Belt. Policy 7.17 on Metropolitan Open Land assigns the same degree of protection as Green Belt	Planning Policy Advice released in October: "Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt"

Adapted from: LB Redbridge (2010), 'Natural England and CPRE (2010) and additional information from GLA (2015)

2. THE PURPOSES OF GREEN BELTS AND METROPOLITAN OPEN LAND

The purposes of Green Belt

A Green Belt is a permanent area of open land that surrounds an urban area. The main aim of this land is to limit uncontrolled urban growth or urban sprawl into rural areas. In London, the Green Belt dates back to pre-war initiatives which sought to retain a good quality rural landscape that was clearly separate from urban areas. Paragraphs 79 to 92 of the National Planning Policy Framework³ set out these purposes and how councils must take them into account when developing their Local Plans.

THE FIVE PURPOSES OF A GREEN BELT ARE TO:

- ▶ check the unrestricted sprawl of large built-up areas;
- ▶ prevent neighbouring towns merging into one another;
- ▶ assist in safeguarding the countryside from encroachment;
- ▶ preserve the setting and special character of historic towns; and
- ▶ assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Additionally, the London Plan policy 7.16 states: *“The strongest protection should be given to London’s Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances.”*⁴

The purposes of Metropolitan Open Land

Metropolitan Open Land is a term or designation used only within London, the purpose of which is to protect land which is of strategic importance to London as a whole. The London Plan states that *“the policy guidance of paragraphs 79-92 of the National Planning Policy Framework on Green Belts applies equally to Metropolitan Open Land.”*

THE FEATURES OF METROPOLITAN OPEN LAND ARE THAT:

- A** it contributes to the physical structure of London by being clearly distinguishable from the built up area
- B** it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- C** it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
- D** it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.⁵

The London Plan states that Metropolitan Open Land has an important role to play as part of London’s multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility.

It also states that the open spaces and links within a Green Chain should be designated as Metropolitan Open Land due to their London-wide importance.

Protected land often has an additional purpose as a Metropolitan Park, Country Park, playing field or recreation ground, and/or as part of a Green Chain

- ▶ **Playing fields** are often historically linked to big companies, for example Ford’s Sports Ground in East London. Many are busy, thriving sports grounds, some are in informal use and some are disused. Find out more at lpff.org.uk.
- ▶ **Recreation grounds** are usually public land used for recreation, sports or games.
- ▶ **Metropolitan Parks** are large areas of open space that provide a range of benefits (recreational, ecological, landscape, cultural or green infrastructure) and offer a combination of facilities and features at the sub-regional level, are readily accessible by public transport and are managed to meet best practice quality standards e.g. Finsbury Park in North London is one of many.

▶ **Country Parks** are areas which were designated mainly in the 1970s for people to visit and enjoy recreation in a countryside environment e.g. Hainault Forest Country Park in Redbridge or Bedfont Lakes Country Park in Middlesex. They provide an informal, natural, rural atmosphere for visitors who do not necessarily want to go out into the wider countryside and are usually close to or on the edge of built-up areas.⁶

▶ **Green Chains** are areas of linked but separate open spaces and the footpaths between them e.g. South East London’s Green Chain which meanders from Nunhead to Thamesmead (see www.greenchain.com). They are accessible to the public and provide way-marked paths and other pedestrian and cycle routes. They are also beneficial to plant and wildlife.



Growers from the Bromley Common Allotment Association show off their pumpkins. The allotments are now under threat from development.

3. LONDON BOROUGHS, THE LONDON MAYOR AND NATIONAL GOVERNMENT: THEIR ROLE IN PROTECTING LAND

There are two ways in which the local, regional (London) and national authorities are involved with protecting land. First they set out the policy in the relevant documents. Second they have a role in judging whether planning applications breach the policy or not. The documents where policy is set out are:

- ▶ At national level, the National Planning Policy Framework
- ▶ At London level, The London Plan
- ▶ At borough level, in each individual borough's Local Plan

Green Belt and Metropolitan Open Land in the National Planning Policy Framework and the London Plan (NPPF)

The NPPF and the London Plan set out the detail of the policy, including its purposes. The NPPF states: *“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt*

policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

The Mayor echoes this statement on Green Belt in the London Plan and also sets out a statement of support for Metropolitan Open Land: *“The Mayor strongly supports the current extent of Metropolitan Open Land (MOL), its extension in appropriate circumstances and its protection from development having an adverse impact on the openness of MOL....”*

How London boroughs reflect national policy in their Local Plan

London boroughs are required to develop Local Plans which reflect national and London policy and which clearly define the boundaries of protected sites. They must also state their own policy towards protection which usually echoes words used within the National Planning Policy Framework and the London Plan to provide full protection to these open spaces. A developer seeking planning permission must take account of the Local Plan policies and site designations.

The boroughs' and Mayor's role in assessing planning applications which involve protected land

The Mayor is consulted on all planning applications that are of potential strategic importance to London and this includes applications for development on Green Belt or Metropolitan Open Land.

A planning application is first submitted to the relevant local planning authorities within London. If it involves a site of potential strategic importance, the authority must refer it to the Mayor. The Mayor has six weeks to provide comments on the application, assessing whether it complies with the London Plan policies. This is a consultation response known as stage one.

The application is then considered by the local planning authority at its planning committee, where it decides whether to grant or refuse permission and then refers the application to the Mayor for his final decision, known as a Stage 2 referral. The Mayor has 14 days to make a decision to allow the local planning authority decision to stand, to direct refusal, or to take over the application, thus becoming the local planning authority.⁷

Appeals process

If a local authority refuses to grant planning permission for a development, the person who submitted the application (the developer) can appeal to a Planning Inspector. The Inspector will then look again at the case, and can either agree with or overturn the local council's decision.

Appeals are heard by inspectors from the *Planning Inspectorate*, an executive agency sponsored by the Department for Communities and Local Government.

Nearly all appeals are decided by the Planning Inspectors or by appointed persons; in each case they are solely responsible for their decision. A very small percentage is decided by the Secretary of State: these tend to be very large or contentious schemes.

Only developers can appeal a decision. There is no third party right of appeal against planning decisions. Communities can, however, request that the Secretary of State 'calls in' a planning application for a public inquiry when a major case that may have more than local significance is involved. This must be done before a formal decision notice of planning permission is issued.



The Friends of Hayes End Hillingdon protesting against the sale of local green space Hayes Park which is Green Belt land, amidst fears that planning permission will be sought for its development for housing

4. THE BENEFITS OF GREEN BELT AND METROPOLITAN OPEN LAND

The benefits of protected land clearly relate to the purposes of the protection (avoiding sprawl into the countryside etc: see Chapter 2). However there are also additional benefits. In recent years, for example, the benefits are understood to extend beyond simply saving the countryside: avoiding

sprawl also helps to tackle air pollution through reducing car journeys and it reduces travel costs. Also, it is now more widely recognised that retaining green open spaces for perpetuity contributes to mitigating the impact of climate change, for instance by contributing to flood protection.

THE KEY BENEFITS OF LAND PROTECTIONS ARE:

► Checking unrestricted sprawl and assisting in safeguarding the countryside from encroachment

The Green Belt designation was established in 1955 primarily to stop urban sprawl and protect the setting of historic towns and cities. International comparisons suggest that without the strong protection the countryside around towns and cities, and in many cases their historic settings, would long since have been lost.⁸

► Avoiding the costs of sprawl

Sprawl has multiple economic costs, including increased travel costs; decreased economic vitality of urban centres; increased tax burdens due to more expensive road and utility construction and maintenance; increased car use leading to higher air pollution and increased health care costs for diseases like asthma, and loss of productive farmland and natural lands that support tourism.

► Recreation, sport, health

The protections have ensured Londoners enjoy open land and countryside in and near the city. Many areas of Green Belt and Metropolitan Open Land are country parks, Metropolitan Parks, playing fields or recreation grounds and support sport and recreation, tourism and health – including reducing stress by providing peaceful, breathing spaces.

► Eco-system benefits

Different types of open land provide multiple eco-system benefits which include urban cooling, improved air quality, flood protection and carbon absorption (especially woodland areas), as well as local food production.

► Future proofing

As London grows into a higher density city, so more people come to rely on protected green spaces for the many benefits they provide. Land protection policy recognises that these protected lands may be, and in fact stipulates that they should be, enhanced to provide more benefits in future.

5. CONFLICTING INTERESTS AND THE FUTURE OF LAND PROTECTION

Public support for land protection policy

In August 2015, on the 60th anniversary of Green Belts becoming government policy, a poll commissioned by the Campaign to Protect Rural England National Office found that nearly two-thirds of people surveyed believed that Green Belt land should not be built on.⁹

The Ipsos MORI poll showed that 64% of people agreed the Green Belt should be protected, while just 17% disagreed. Such strong support for Green Belt is demonstrated across a range of different groups, including people with children aged 5 and under, those renting from a local authority, and those on low incomes, and 62% of people who live in towns and cities.

Public support is reflected in policy, as set out elsewhere in this report, as well as via political pledges from the all the main political parties.

Developers are more likely to argue against land protections.

Building on green field land is usually cheaper than building on brownfield. Contaminated land in particular is expensive to restore before it is safe to build on. Green land can also provide a site which is attractive to home buyers so increasing the sale value of newly built homes. Also, 20% VAT applies on upgrading or altering buildings for residential use but new buildings are exempt on green field sites.

In recent years and months a number of arguments have begun to emerge, that the benefits of land protections are not as important as the need to provide land for development, notably in two Adam Smith

Institute publications *The Green Noose*¹⁰ and more recently in *A Garden of One's Own*¹¹ which claims: *"Green Belts are unsustainable. Urban containment policies push up rents and house prices and generally increase the cost of living, force households into ever smaller homes and more cramped transport, and are harmful to the environment. This hugely depresses people's quality of life."*

But, as CPRE pointed out in 2015, the arguments within these reports are based on a highly selective reading of the relevant evidence, and give little consideration to the wide range of benefits provided by Green Belt policy. The argument urgently needs to be challenged and CPRE has issued *Green Belt myths: CPRE's guide to what you need to know*¹² to do just that.

Where would London be if land protections were not in place?

One way of looking into the future is to look back. Where would London be now if land protections had not been in place? As Andrew Motion, former president of CPRE, said: *"Since about 1940, the population of Los Angeles has grown at about the same rate as the population of London. Los Angeles is now so enormous that if you somehow managed to pick it up and plonk it down on England, it would extend from Brighton on the south coast to Cambridge in the north-east. That's what happens if you don't have a green belt."*

In CPRE London's view, it is at times when cities grow that land protection policies are most critical. At these times ideally they should be strengthened rather than weakened or abandoned.



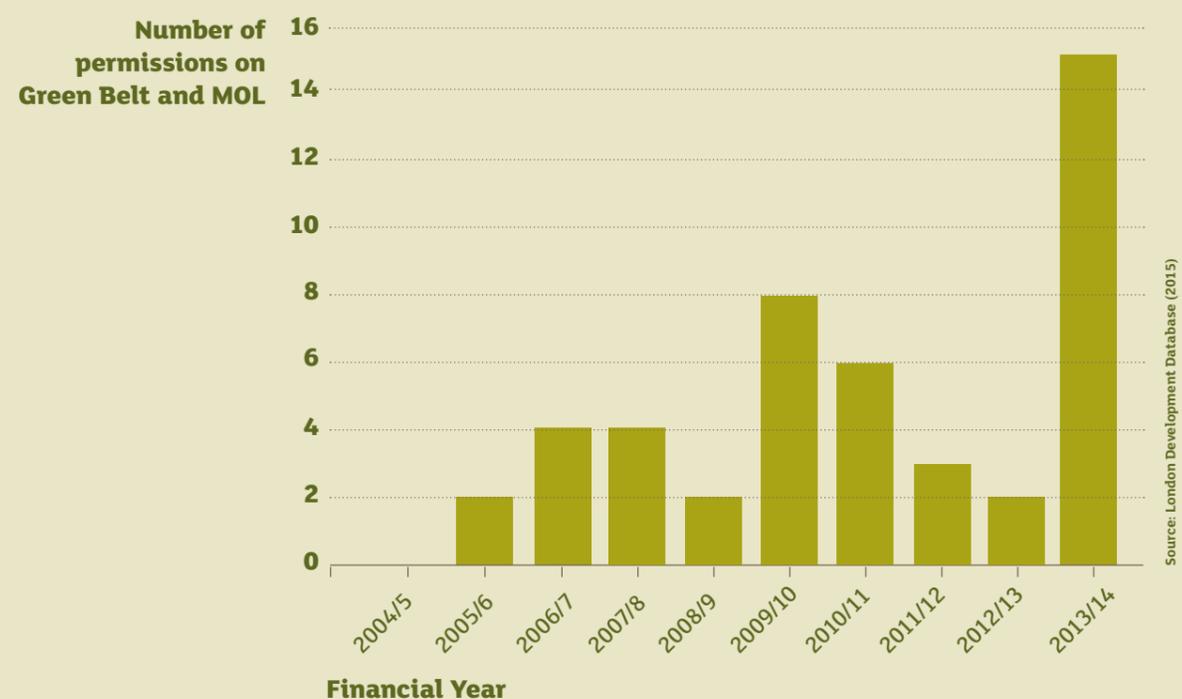
Protestors at Brent Lea Recreation Ground in Hounslow are concerned about proposals to build a school on the site.

6. RECENT INCREASE IN THREATS TO GREEN BELT AND METROPOLITAN OPEN LAND IN GREATER LONDON

In 2013/14 Greater London saw a sharp increase in the number of permissions given for development on Green Belt and Metropolitan Open Land as Graph 1 below shows

GRAPH 1:

NUMBER OF PLANNING PERMISSIONS ON GREEN BELT AND METROPOLITAN OPEN LAND



The Mayor's Key Performance Indicator 3 is 'minimise loss of open space' and according to the Annual Monitoring Report this was not achieved in 2013/14.

The London Plan Annual Monitoring Report 11, 2013-14,¹³ table 2.5 "shows the overall loss of protected open space approved during 2013/14, was just under 20 hectares. This is a very large increase on the previous financial year where the figure was less than 0.6 ha."

The commentary in the report states: "The number of approvals on protected open space has also risen sharply from four to 29." Our graph above only shows 15 approvals on protected open space. The Mayor includes any category of designated open space, including Urban Open Space, which accounted for 14 further approvals in 2013/14.

The rise in approved and completed planning applications continues to result in loss of Green Belt and Metropolitan Open Land

Graph 2 shows the amount of open space lost in hectares by designation from 2004/05 to 2013/14 in Greater London. Loss of Green Belt and Metropolitan

Open Land amounted to over 100 hectares in this time period. The rise in permissions in 2013/14 may not yet have translated into reported loss, hence the figure for loss in 2013/14 does not appear high.

GRAPH 2:

GREEN BELT AND METROPOLITAN OPEN LAND LOST (HECTARES 2004/5 TO 2013/14)



The current picture: CPRE London is currently aware of threats to 51 Green Belt and Metropolitan Open Land sites in Greater London.

There may be other sites which we are not currently aware of. The picture is continually changing and details can be seen on our online Protect London map at www.cprelondon.org.uk/resources/item/2288-protect-london-map.

7. PARKS, RECREATION GROUNDS, SPORTS GROUNDS: AN ANALYSIS OF WHAT IS UNDER THREAT

The definition used for 'threatened' is intentionally broad and includes sites where there is significant evidence that development may occur at the site. This is necessarily a subjective judgment however the intention is to include only sites where there is a serious concern that protected land will be lost as a result of development on the site. Occasionally a site is included if proposed surrounding development would significantly impact on the openness of the site.

An analysis of the threats to protected land in Greater London

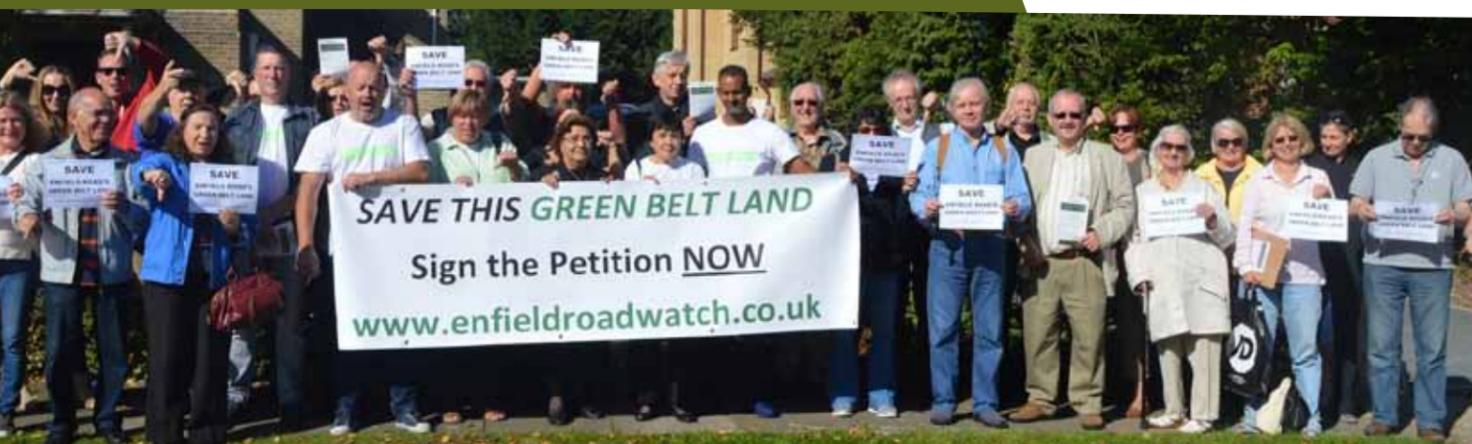
51 sites are currently under threat (that we are aware of). Of these 31 are Green Belt and 20 are Metropolitan Open Land.

The overwhelming majority of the threats relate to housing or schools. 11 sites are threatened with housing developments (5 of which are housing developments combined with education or other development). 31 sites are threatened with education developments, mainly new schools or expanded schools (of which 7 are education developments combined with housing or other development).

THE 51 SITES REPRESENT A RANGE OF DIFFERENT TYPES OF LAND USE. OF THE 51:

- 17 sites are playing fields
- 13 sites are open land or fields used for a variety of recreational activities
- 3 are allotments/community food growing sites
- 2 are in historic parks, one is in the Lea Valley Regional Park (currently a utility depot)
- 2 are utilities sites (sewage / water works)
- 4 sites contain existing buildings within a Green Belt or Metropolitan Open Land setting
- 1 site is a recreation ground
- 1 site is a sports stadium within a Green Belt or Metropolitan Open Land setting
- the remainder are less well defined sites.

Enfield Road Watch campaigners who are fighting to save the Glebe Land in Enfield



8. SITES CURRENTLY UNDER THREAT IN GREATER LONDON

This section sets out some examples of the 51 protected Green Belt or Metropolitan Open Land sites in Greater London under threat at the time of writing. These are the ones which we are aware of. There may be others. More details on the sites and the threats to them can be found on our map at www.cprelondon.org.uk



Trent Park in Enfield. Berkeley Homes has recently acquired a site in the park including an historic building as well as Green Belt land surrounding it.

PLAYING FIELDS



EALING:

Warren Farm (Metropolitan Open Land)

Warren Farm Sport Centre is used for recreation and sport by local residents as well as football and cricket clubs. The planning application to provide training facilities and pitches for Queen's Park Rangers Football Club has come under intense criticism from local residents who say it will remove a large area from community use and the sizeable structures proposed will impact on the openness of the space. Ealing Council approved the application in Summer 2015 and the Mayor of London has also given the go ahead for the decision (October 2015).

Pictured: The Warren Farm grounds, the majority of which will no longer be for community use



HOUNSLOW:

White Lodge Sports Ground, Osterley (Metropolitan Open Land)

This site is currently a disused sports ground. A planning application was approved in late 2015 to develop the Nishkam School West London (a new free school) with associated facilities. The Mayor has also given the go ahead. The site is not designated for education use and is not shortlisted in the Local Plan site allocations. The lawful use of the site is for sports and recreation and the development will lead to loss of Metropolitan Open Land.

Pictured: The White Lodge Sports Ground in Hounslow which has been acquired with support from the Government's Education Funding Agency. Planning permission has been given for a school to be built on the site



REDBRIDGE: Oakfield Playing Fields (Green Belt)

This is arguably the most alarming case of Green Belt under threat we have identified to date. The site contains top quality cricket and football pitches which are in high demand and it is a strategically important sports site for East London being located near public transport which makes it valuable for Londoners travelling from parts of inner East London. Redbridge Council has said that it cannot meet its targets for new homes without building on green space and has identified the well-used Oakfield Playing Fields as its preferred site to locate 1,000 new homes. The proposal would result in the loss of 75% of this area of Green Belt and an irreplaceable sporting facility.

Pictured: Oakfields Playing Fields, currently the council's preferred site to build 1,000 new homes, has some of the best cricket and football pitches in East London

PARKS



WALTHAM FOREST: Thames Water Depot site in Lee Valley Regional Park (Metropolitan Open Land)

The Lion Academy Trust acquired this site in January 2016 for a new secondary school with support from the Government's Education Funding Agency¹⁴ despite no planning permission having been sought or granted, despite the site not being in the Local Plan and despite it being part of the Lee Valley Regional Park. Though it is currently a depot and not green space (it is currently paved over), the Park Authority has set out options for bringing the site into 'park compatible use' in the Lee Valley Park Development Framework. Among the options it has identified are a 'biodiversity and/or heritage based visitor attraction' and 'new recreational or sporting facilities'.

Pictured: The Lee Valley Waterworks Nature Reserve. This is next door to the Thames Water Depot site which has been acquired with support from the Government's Education Funding Agency and is the proposed site for a new school even though the site is also part of the Lee Valley Park



ENFIELD: Trent Park (Green Belt)

Berkeley Homes has recently acquired a site in the park including an historic building as well as Green Belt land surrounding it. The 50 acre site at the heart of Trent Park – the former Middlesex University campus and World War II Prisoner of War camp – was sold to Berkeley Homes in 2015. The Friends of Trent Country Park say that the developers, through their representative at Curtin & Co (a public relations firm), told them that the site no longer has educational use and that they will be allowed to build houses in the Green Belt. See more at www.savetrentpark.org.uk.

Pictured: Trent Park in Enfield. Berkeley Homes has recently acquired a site in the park including an historic building as well as Green Belt land surrounding it



ENFIELD: Grovelands Historic Park (Metropolitan Open Land)

Enfield Borough Council is consulting on ideas for building a new school on part of the historic parkland of the former Grovelands House. The council applied to Historic England in October 2015 asking whether or not a new school would be acceptable in principle at this site.

Pictured: Grovelands Park. Enfield Council is consider whether to build a school in part of the park

OPEN LAND



ENFIELD: Land south of Enfield Road, locally known as the Glebe Land (Green Belt)

Fairview New Homes' application to build a secondary free school and up to 300 dwellings on this area of Green Belt land was turned down by the Mayor in February 2016, though local campaigners are concerned that the land remains under threat. The Local Plan is up for review in 2016 and campaigners fear that Green Belt boundaries will be changed as part of that review, including for this site, which they have pointed out is highly valued by local people.

Pictured: Horses on the Glebe Land in Enfield, Green Belt land currently under threat from development



CROYDON: Shirley Oaks (Metropolitan Open Land)

Croydon's Local Plan review proposes the de-designation of this area of Metropolitan Open Land and allocation of much of the area for housing development. This would result in the loss of well-loved open space and increase future threat to an allotment site and Green Chain. In January 2016, 450 people attended the Town Hall to protest against the proposals.

Pictured: Shirley Oaks in Croydon, now under threat from development



RICHMOND: Whitton (Metropolitan Open Land)

The Government's Education Funding Agency has worked with a school provider to identify this area of Metropolitan Open Land as the permanent site of Turing House School. Planning permission will need to be gained for this to go ahead. Local campaigners say their "main concern for the Whitton site is that it is Metropolitan Open Land and should not be built on. There is also a proposal to use Springfield Road as the route to the site entrance. This could only be achieved if a road was built through Heathfield Recreation Ground, itself Open Green Space used every day for children to play, dog walking and numerous football clubs. This is a totally unacceptable idea, to destroy two large sections of land for a school that has an admissions policy of just 20% for Whitton children."¹⁵

Pictured: Heathfield Recreation Ground which is also threatened as part of plans to build a new school on the Hospital Bridge Road site – Metropolitan Open Land in Whitton

POSSIBLE NATURE RESERVES OF THE FUTURE



NEWHAM: Beckton Sewage Treatment **WORKS** (Metropolitan Open Land)

The council's proposal to remove this site's status as Metropolitan Open Land is likely to lead to future development on this site which is also, in part, designated as a Site of Nature Conservation Importance. CPRE London believes that the council should, instead, plan for the enhancement of the space (as the London Plan requires) as it continues to fulfil the objectives of its designation. There are examples of former water works which are now nature reserves in London including the Lee Valley Park Waterworks Nature Reserve, former filter beds.

Pictured: Beckton Sewage Treatment Works. Newham Council want to remove the Metropolitan Open Land designation despite the potential to create a space for recreation or wildlife in the future.



KINGSTON UPON THAMES: Hogsmill Valley (Metropolitan Open Land)

There are a variety of early stage plans for this unique site. Proposals include possible development of student accommodation and a primary school. The Council's masterplan of the area illustrates a potential loss of 7.15 hectares of Metropolitan Open Land and, more importantly, loss of a green space with incredible potential as a future green asset for London.

Pictured: The Hogsmill River in Kingston, part of the Kingston Opportunity Area where proposals signal potential loss of over 7 hectares of Metropolitan Open Land



ALLOTMENTS



BROMLEY: Turpington Lane Allotments, Bromley Common (Green Belt)

As part of Bromley's local plan review these allotments are under threat. The council is proposing to remove their Green Belt protection and allocate the site for a new school. Bromley has identified 17 protected green sites in the borough which it proposes to allocate for development, largely for schools.

Pictured: Bromley allotments – now under threat from development



BARKING & DAGENHAM: Woodlands and Central Park Nursery, including Growing Communities Dagenham Farm (Green Belt)

In Barking and Dagenham's draft local plan, currently under consultation, the council is proposing to remove the designation of Green Belt from this area of land because the council argues that the boundary is 'indefensible'. While this is a valid justification for removing Green Belt status, this will leave the land unprotected from development. CPRE London has therefore argued that the site's designation should not be removed but should change from Green Belt to Metropolitan Open Land.

Pictured: Growing Communities' Dagenham Farm. Barking and Dagenham Council are proposing to remove the Green Belt designation. CPRE London believes it should be replaced with Metropolitan Open Land designation

HOUNSLOW: Brent Lea Recreation Ground (Metropolitan Open Land)

A local campaign has saved Brent Lea Rec from development, at least for the time being, as the council has found a new temporary site for Floreat's new Brentford Primary School. However, local campaigners strongly suspect that they are still going to put in a planning application for the permanent school to be built on the recreation ground. This is despite campaigners' view that there is a plausible alternative site located close by.

Pictured: Brent Lea Recreation Ground in Hounslow: proposals to build a new school on the site have not entirely gone away, according to local campaigners



If you are aware of any sites at risk not already listed on the map at cprelondon.org.uk, please contact CPRE London at office@cprelondon.org.uk.

9. REASONS WHY THREATS TO PROTECTED LAND ARE ON THE INCREASE

The national government and Mayor of London say they attach 'great importance' to Green Belt and Metropolitan Open Land and their stated policies severely limit what can be built on protected land

Stated policies (detailed elsewhere in this report) are backed up by pledges from politicians of all parties. David Cameron pledged before the May 2015 General Election to protect the Green Belt. "Put simply: the Green Belt is protected with us."

So why is London's protected land now coming under increasing threat?

A WEAKENED PLANNING SYSTEM

In every local authority area, the Local Plan sets out what is needed locally and the policies which must be adhered to by developers, including those which protect London's green spaces. In the last four years since 2012, however, the government has made a series of changes which have introduced conflicting objectives into this system. The effect of this has been to introduce inconsistency in decision making and to undermine some policies which are not regarded as important as other policies.

The impact of these changes have been analysed by CPRE in two key papers since the introduction of the National Planning Policy Framework in 2012. CPRE wrote originally about the impact of changes to the planning system in its 2013 publication *Countryside Promises, Planning Realities*¹⁶ which details how the changes are undermining the planning system.¹⁷ More recently the report *Community Control or Countryside Chaos* of March 2014 provides firm evidence from across England that the Government's planning reforms are not achieving their stated aims. "Far from community control of local development, we are seeing councils under pressure to disregard local democracy to meet top-down targets" Shaun Spiers, Chief Executive of CPRE said.

In essence, the liberalisation of the planning system is intended to 'cut red tape' but the evidence suggests it is creating ambiguities and confusion so that planning decisions are increasingly inconsistent at all levels – something CPRE London alluded to in our recent publication *The Arcadian Thames: Planning Policy Ignored?*¹⁸

Linked to this, high housing targets, which are given to local authorities with little or no reference to local constraints, including whether they will push development onto protected green space, undermine councils' Local Plans and force inappropriate development on communities. This issue is detailed in CPRE's report *Set up to Fail* (2015).¹⁹

GOVERNMENT ACQUIRING PROTECTED SITES FOR SCHOOLS

The Government's Education Funding Agency is involved with acquiring protected sites to locate new schools which are not identified in the Local Plan

This is highly prejudicial to the planning system as it effectively applies pressure to planning authorities to consent to the development. The cases involving the government's Education Funding Agency which CPRE London is currently aware of are (it is not clear if there are others as the information is not publicly available):

- ▶ the White Lodge Sports Ground site in Hounslow (Metropolitan Open Land)
- ▶ Beckenham Academy in Bromley (Urban Open Space)
- ▶ the site for Turing House School on Hospital Bridge Road in Whitton (Metropolitan Open Land)
- ▶ the Waltham Forest site on the Lea Bridge Road (Metropolitan Open Land)
- ▶ the Glebe Land in Enfield (Green Belt).
- ▶ the Bowring Sports Field, Lee Green, London Borough of Greenwich (Metropolitan Open Land)

A separate CPRE London report *A done deal: how new schools are being built on Green Belt and Metropolitan Open Land in Greater London*²⁰ published in December 2015 highlights cases in Greater London where schools have been built or are being planned on Green Belt and Metropolitan Open Land contrary to government policy and clear government guidelines.

THE WRONG SIGNALS

The examples above are sending the message that protected land can now be developed, resulting in speculative applications and inappropriate treatment of protected land in borough Local Plans

When land protections are not adhered to, landowners see that previously valueless land might now be sold with planning permission at a higher price; developers see prime plots of land; and even public authorities – cash-strapped local councils, the Mayor’s office and our national government – see opportunities for market-price land sales.

In many of the cases cited in this report, developers appear to be responding to signals suggesting they can now build on protected land. For example, in Enfield and Waltham Forest recent press announcements stated that schools will be opening on protected plots, though no planning permission has been sought; and in Hayes Park in Hillingdon a privately owned piece of protected land has been put up for sale £5 million despite it having been turned down for planning permission several times in the past.

DERELICT AND UNDER-USED SITES

Local authorities are required to plan to enhance Green Belt and Metropolitan Open Land. This is much more important than it might first appear: when sites become derelict, they come under threat

The London Playing Fields Association’s Chief Executive has put this succinctly in relation to playing fields, though the same applies to green spaces more generally, even parks. *“I think a lot of fields are lost because of neglect, and what happens is they fall into what we call, ‘A cycle of playing field decay’. As they become neglected so they’re underused, and because they’re underused*

there’s no investment, neither for maintenance or improvements, and the underinvestment leads to undervalue, and eventually that undervalue leads them to be under threat, and they’re gone.”²¹

In a number of the cases cited in this report, for example the Brent Lea Recreation Ground and the White Lodge Sports Ground, it has been argued by the developer that the site is not well used and that this is one justification for building on it. This is despite the fact that a low level of use cannot, according to London and national policy, be used as a justification for building on protected land. In fact, policy states that enhancements should be made to encourage use.

There is vast potential for neglected green or open spaces, even where it does not immediately appear so.

The story of the Lee Valley Regional Park is a good example (see box). In other cases, old water works have been turned into nature reserves, for instance the Barnes Wetland Centre and the Lee Valley Waterworks Nature Reserve.

Much of the Lee Valley Park was created from industrial wasteland. The Lee Valley was once home to a diverse range of industries, gravel pits, waterworks sites, distilleries and munitions factories. Over the years much of the land across the valley became neglected and derelict. Rescuing the Lee Valley from its years of neglect and regenerating it as a ‘great playground for Londoners’ was questionable before the Second World War. It was suggested in Sir Patrick Abercrombie’s Greater London Plan in 1944 that ‘the Valley gives the opportunity for a great piece of regenerative planning.....every piece of land welded into a great regional reservation’.

What might seem to be an unattractive site now can be a park of the future: planning policies require local authorities to plan positively to enhance Green Belt and Metropolitan Open Land

The National Planning Policy Framework states: *“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*

Additionally, the London Plan states: *“The policy guidance of paragraphs 79-92 of the NPPF on Green Belts applies equally to Metropolitan Open Land (MOL). MOL has an important role to play as part of London’s multifunctional green infrastructure and the Mayor is keen to see improvements in its overall quality and accessibility.”*



In January 2016 residents protested about proposals to build on Shirley Oaks, much loved Metropolitan Open Land in Croydon

10. HALTING THREATS TO LONDON'S PROTECTED GREEN SPACES

The real story is that it is frequently now being left to local resident groups to campaign to save Green Belt and Metropolitan Open Land in Greater London.

CPRE London believes urgent action is now needed to halt the loss of London's protected green spaces.

Politicians should halt the loss of London's precious Green Belt and Metropolitan Open Land and call an immediate stop to the current sacrifice of playing fields, parks and recreation grounds for development

▶ We want politicians at all levels to go beyond simply saying that they support the continued protection of the Green Belt and Metropolitan Open Land and halt the permitting or promotion of development on these protected green spaces.

▶ The Mayor should overturn inappropriate permissions granted by councils and inappropriate identification of sites in borough Local Plans.

Clear signals are needed from the Mayor and the government to halt speculative planning applications on, and sales of, protected land

▶ The Mayor and government must recognise that developers and landowners need a clear signal in relation to protected land, should take a strong line and should send a clear message that no applications on Metropolitan Open Land or Green Belt will be permitted except in genuinely exceptional circumstances.

The government's Education Funding Agency must cease seeking out and acquiring protected sites in London for free schools

▶ The Mayor and the Secretary of State should clarify that a need (or demand) for school places cannot justify building on either Green Belt or Metropolitan Open Land in London, either via a Local Plan site allocation or a planning application.

▶ The Mayor should engage with the government's Education Funding Agency to request that it ceases to seek out and acquire protected sites in London for schools.

There is no need to build on London's precious Green Belt and Metropolitan Open Land. Alternatives exist. Use these instead

▶ Instead of sanctioning build on protected land, the Mayor and boroughs should support high quality, high density development that meets local needs; use brownfield land first, not greenfield; regenerate run down areas; and provide funding for restoration of contaminated land.

Local constraints should be recognised when housing targets are set

▶ Terminology and guidance in the National Planning Policy Guidance needs to be reviewed, clarified and expanded to allow for more responsive assessments.

▶ Local Plans should be allowed to weigh up all evidence for housing need, demand and constraints on an equal basis and come to a housing target which is flexible and subject to regular review.

We want to see provisions requiring councils to plan to enhance protected green spaces given more weighting by councils and more support from the Mayor, to ensure sites are well used and do not become derelict

▶ We want the new Mayor of London to support boroughs and commit to creating between 5 and 10 new parks and commons for London, taking protected but unattractive, under-used or derelict land and giving it a clear, new identity, securing its future. These could be re-wilding projects; 'destination parks' with a café, children's play and other features; or a strategic sports ground for example.

▶ To improve investment in, and so reduce threats to, London's green spaces, we want the new London Mayor to create 'Pfl': Parks for London. Like TfL, Transport for London, this would make an ambitious vision come to life – in this case, an interconnected network of parks, green spaces and playing fields across London, achieved through coordinating and promoting public, private and voluntary sector action.

AFTERWORD

London, its Green Belt, and beyond

CPRE London is working with other CPRE branches around London and the London Green Belt Council to highlight the wider threats to London's Green Belt.

In a forthcoming report, we will be looking at the extent of the current threats to the whole of London's Green Belt, as well as looking more closely at the interrelationship between city and countryside.

1. Avon (Bristol and Bath), Burton on Trent and Swandicote, Cambridge, Gloucester & Cheltenham, Greater London, Tyne and Wear, Durham and Hexham, Merseyside and Greater Manchester, Nottingham and Derby, Oxford, South and West Yorkshire, Dorset, Bournemouth and Poole, Stoke-on-Trent, West Midlands, York
2. London Development Database, 2015 and DLG, 2014
3. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60777/2116950.pdf
4. <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-7/policy-716-green-belt>
5. <https://www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-7/policy-717-metropolitan>
6. https://en.wikipedia.org/wiki/Country_park
7. <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/what-powers-does-mayor-have-planning#sthash.cqoJ96wC.dpuf>
8. <http://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/1955-green-belts-a-greener-future-summary>. This report summarises research on the benefits of land protection policy.
9. <http://www.cpre.org.uk/media-centre/latest-news-releases/item/4033-60th-anniversary-poll-shows-clear-support-for-green-belt>
10. <http://www.adamsmith.org/research/reports/the-green-noose/>
11. <http://www.adamsmith.org/research/reports/a-garden-of-ones-own/>
12. <http://www.cpre.org.uk/what-we-do/housing-and-planning/green-belts/in-depth/item/3027-green-belt-myths>
13. <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/monitoring-london-plan>
14. http://www.thisislocallondon.co.uk/news/14205538.Site_secured_for_new_secondary_school_which_will_offer_1_400_new_pupil_places/?ref=mr&lp=6
15. <https://www.change.org/p/teddington-s-turing-house-secondary-school-may-be-built-in-whitton>
16. <http://www.cpre.org.uk/resources/housing-and-planning/planning/item/3260-countryside-promises-planning-realities>
17. <http://www.cpre.org.uk/media-centre/news-release-archive/item/3264-nppf-verdict-less-local-control-more-greenfield-development>
18. <http://www.cprelondon.org.uk/resources/item/2297-the-arcadian-thames-planning-policy-ignored>
19. <http://www.cpre.org.uk/magazine/features/item/4167-set-up-to-fail>
20. <http://www.cprelondon.org.uk/resources/item/2300-a-done-deal-how-new-schools-are-being-built-on-green-belt-and-metropolitan-open-land-in-greater-london>
21. <http://www.pressat.co.uk/media/uploads/9e277e43b36314ac22c2156d37d786e0.pdf>



March 2016

70 Cowcross Street London EC1M 6EJ
www.cprelondon.org.uk
Tel: 020 7253 0300

CPRE London is a registered charity. Number 802622