

# The Strongest Protection? One year on

## Threats to Green Belt and Metropolitan Open Land in Greater London

### May, 2017

#### INTRODUCTION

This report outlines current threats from proposed development to designated Green Belt and Metropolitan Open Land in Greater London. Such designations are intended to provide the land they cover with the strongest protection from development available under planning legislation.

In 2015 CPRE London published an online map of threats to 'protected' green spaces in Greater London. This was followed up in March 2016 with the publication of a report [\*The Strongest Protection?: Green Belt and Metropolitan Open Land in Greater London, the real story\*](#) with data showing an increase in planning applications to build on London's 'protected' green spaces - designated Green Belt and Metropolitan Open Land (MOL) - giving details of 51 threatened sites.

Following the publication of our 2016 report, the current Mayor Sadiq Khan made a strong commitment in his manifesto to London's protected land, both Green Belt *and* MOL. This was important to help ensure land is saved from development because such political signals are vital: when developers and landowners believe there might be a weakening of policy, this can give rise to speculative and opportunistic applications to build on protected land.

This report updates *The Strongest Protection?* taking account of the latest information from official sources. The previous report provides more detail on the meaning, history, extent and purposes of protected land in London. It also explains the role of the London Borough Councils, the London Mayor and national Government in relation to protected land and makes a series of recommendations which remain salient.

#### WHAT HAS CHANGED OVER THE PAST YEAR?

- We have now identified 56 protected sites (30 Green Belt and 26 MOL) in Greater London on our map as being under threat from development. Last year we reported 51 Green Belt or MOL sites under threat: 8 have been removed and 13 added. The map also includes seven other important sites under threat.
- The significant increase in planning permissions resulting in loss of protected land seen in 2013/14 has continued into 2014/15. There was also a sharp increase in referrals to the Mayor of planning applications involving Green Belt or MOL (known as 'Stage 1 referrals') between 2014/15 and 2015/16. Applications continue to translate into loss of protected land

with one major development accounting for the majority of the loss in 2014/15. Statistics for 2015/16 are due in June 2017.

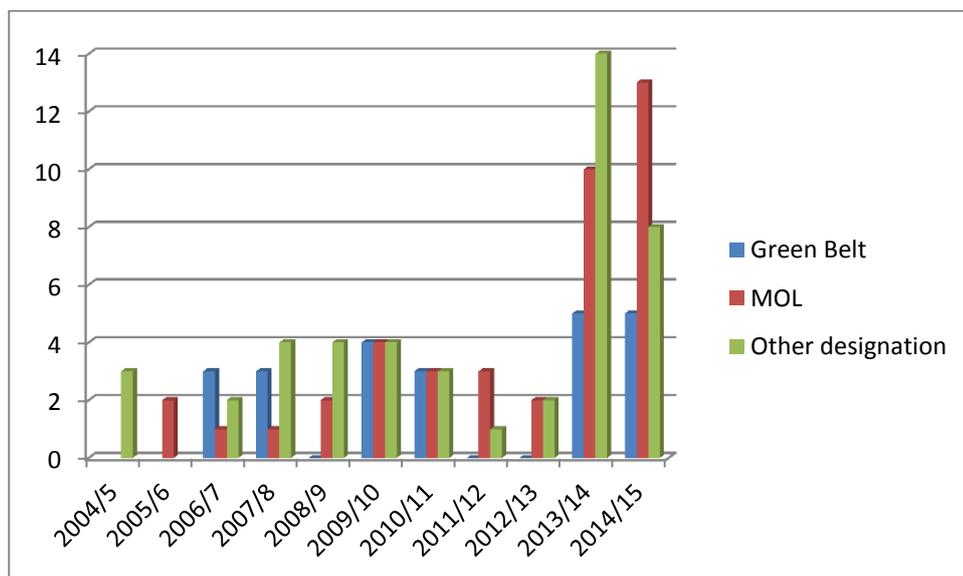
- Planning applications have in the past been the main way that threats to protected land arise. However, the loss of protected land through the Borough Local Plan preparation process is becoming a major concern. Redbridge, for example, is pushing towards release of 5 major Green Belt sites, citing the need to accommodate housing targets, and Croydon is following a similar path. Bromley has also used the local plan process to allocate protected sites for new and expanded schools.
- 29 of the sites under threat are open land used for a variety of informal recreational activities, 16 are sports grounds or playing fields, 7 are parks, 3 are woodlands and 3 are allotments. This is a similar picture to last year with the majority of threatened sites being open land or playing fields. It is a great concern that the number of parks under threat has increased.
- Proposed new schools and school expansions are behind 27 of the threats and residential development behind 14. Again this is similar to last year and in part reflects the acquisition of protected land by the Government’s Education Funding Agency for the development of free schools. The largest sites are usually threatened by proposals for residential development.

## THE GROWING THREAT TO GREEN BELT AND METROPOLITAN OPEN LAND IN GREATER LONDON

*We are now seeing an increase in permissions alongside an increase in ‘Stage 1’ referrals to the Mayor.*

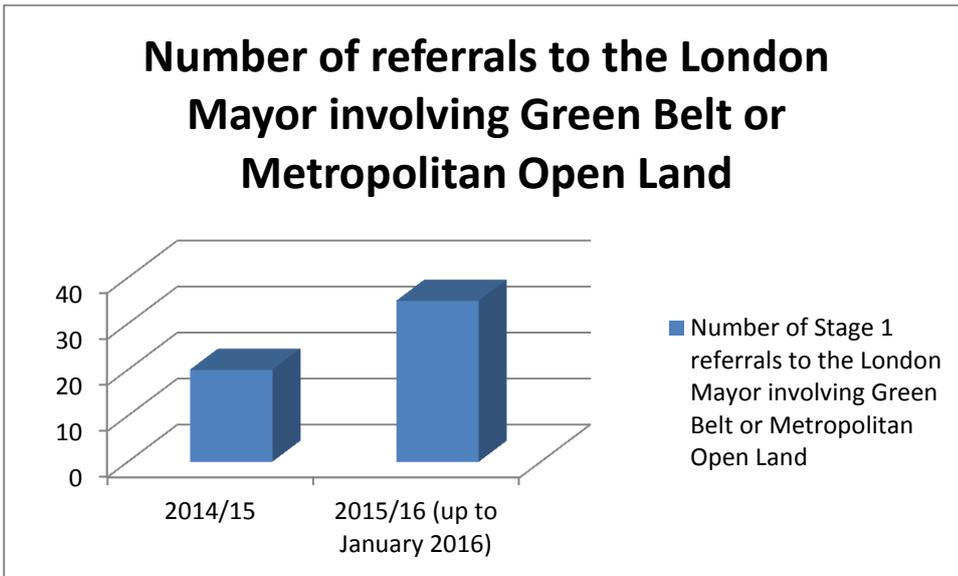
The sharp increase in planning permissions resulting in loss of protected land seen in 2013/14 has continued into 2014/15.

Figure 1: Number of permissions resulting in loss of space 2004/5 to 2014/15 (Source: GLA Annual Monitoring Reports. Figures for 2015/16 are due to be published in June)



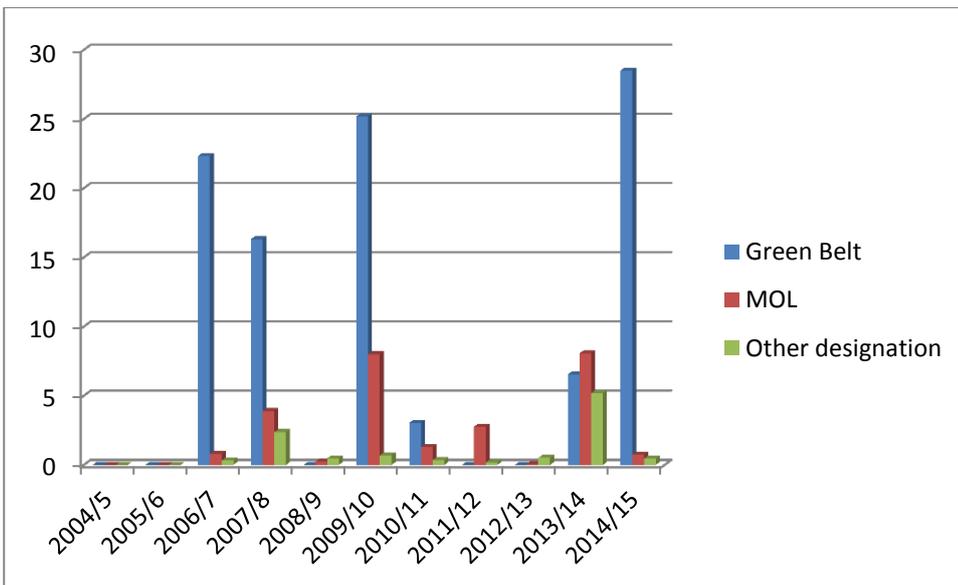
**Referrals to the Mayor involving protected land increased dramatically between 2014/15 and 2015/16**

Figure 2: When a London Borough receives a planning application involving Green Belt or Metropolitan Open Land it must refer it to the Mayor - known as ‘Stage 1 referrals’. This graph shows the number of referrals received by the Mayor in the past two years (though the 2015/16 figure only includes referrals up to January 2016 so is likely to be an underestimate). Source: response to Mayoral Question asked by Baroness Jones, 22/02/16.



*The impact of these trends is not yet clear but the continuing incremental loss of London’s protected spaces is demonstrable.*

Figure 3: Loss of protected space (hectares) 2004/5 to 2014/15 (Source: GLA Annual Monitoring Reports. Figures for 2015/16 are due to be published in June)



## LOCAL PLAN PREPARATION: A NEW THREAT TO PROTECTED LAND?

London Boroughs can seek to remove Green Belt and MOL protection as part of their Local Plan preparation process. In line with national Green Belt policy, they must demonstrate ‘exceptional circumstances’ and should also have conducted a Green Belt review to judge whether there are areas of Green Belt land which might no longer be fulfilling their function i.e. to hold back urban sprawl, stop towns from merging, protect the setting of historic towns and encourage city and town regeneration. There is growing evidence that Borough Councils are proposing the release of Green Belt sites in this way:

- Most concerning currently is Redbridge’s Draft Local Plan which identifies 5 large Green Belt sites which the Council proposes to allocate mainly for housing. They argue they cannot find the sites to meet their housing targets without doing this. The Plan is at Examination in Public stage and the Inspector will be considering responses from residents and campaigners during June 2017. CPRE London believes that the London Borough of Redbridge has sought to allocate well over double the amount of land than will actually be needed for housing according to any realistic scenario. Sadly this is not unique to Redbridge: it is a common picture across the country as revealed recently by CPRE national office in their report [Set up to fail](#).
- Croydon’s Draft Local Plan identifies a number of large Green Belt sites, again for housing. Bromley’s Draft Local Plan also allocates many small Green Belt and MOL sites, mainly to provide for new and expanding schools. CPRE London argues that Bromley has largely failed to look for alternatives and that the need for school places cannot be regarded as an ‘exceptional circumstance’ - applying as it does across most of London.
- No less than 49 protected sites are identified for potential development in Havering’s Draft Local Plan - though these are a result of a ‘call for sites’ and have not been identified as needed for development by the Borough Council. It remains to be seen whether the Council accepts these but for now it is encouraging that they have said they can meet their housing targets without building on Green Belt.

**Note on the Mayor’s powers** The Mayor can say whether he is content or not with a Borough’s decision regarding a planning application involving Green Belt or MOL. However, he must refer to his own planning policy set out in the London Plan and his decision can be appealed. London Plan policy must also be taken into consideration when the Boroughs prepare their Local Plans and so must reflect the Mayor’s commitment to protected land. If a borough like Redbridge decides to include the allocation of protected sites in its draft Plan, the Mayor must give an opinion on whether it meets London Plan policy or not. If he says it does not meet the policy, then it will be for the Planning Inspector to decide whether any proposed Green Belt or MOL release has been adequately justified.

## PLAYING FIELDS, PARKS, ALLOTMENTS: AN ANALYSIS OF WHAT IS UNDER THREAT

The number of protected sites in London known to be under threat featured on our [www.cprelondon.org.uk](http://www.cprelondon.org.uk) map is 56

- Green Belt sites 30
- Metropolitan Open Land sites 26

We have also featured seven sites on the map which do not have the ‘strongest protection’ of Green Belt or MOL but are important sites nonetheless. These include, for example, Shoreditch Park in Hackney, Walden Woods in Bromley, the large site of the Lidl development in Kingston and the Northfield allotments in Ealing, which are thought to be the oldest allotments in London dating from 1832.

### What are these sites currently being used for?

- |  |    |
|--|----|
| • Open land used for a variety of informal recreational activities | 29 |
| • Sports grounds / playing fields                                  | 16 |
| • Parks  | 7  |
| • Woodland   | 3  |
| • Allotments   | 3  |
| • Other*   | 5  |

\*Golf course, sewage works, historic building grounds, recreation ground, hospital grounds

### Playing fields

Sadly, is it nothing new to see playing fields at risk. The London Playing Fields Foundation (<http://lpff.org.uk/About/Fields-at-Risk>) reports that 20,000 playing fields have been lost since 1990 and that there has been a 40% drop in the number of cricket wickets in London in the past 20 years. Efforts to tackle obesity will be further frustrated as a result of the continued threat to increasingly scarce playing fields.

### Parks under threat from development

It is a particular concern to see a rise in the number of parks under threat rise from the two we identified last year. Current threats include proposals affecting:

- Victoria Tower Gardens in Westminster where a holocaust memorial and learning centre have been proposed
- Shoreditch Park in Hackney, where the Council proposes erecting a leisure centre on the ball courts, displacing the Britannia Leisure centre to make way for residential and school development
- A site in the Lea Valley Regional Park, which was leased to Thames Water as a depot with the intention of it being returned to the park, but has now been acquired for a ‘free school’
- Historic Grovelands Park in Enfield, where proposals for a school are still under consideration

### Type of development proposed for the threatened sites

- ***The Government’s Education Funding Agency (EFA) has been acquiring protected sites in London on which to build ‘free schools’***, bypassing the local planning and consultation processes and often ignoring the location in terms of need for school places as expressed by the local authority (meaning proposed ‘free schools’ are often in the wrong place). 27 of the threats relate to proposed school developments, the majority relating to new schools but also a number of school expansions. It is not always possible to ascertain whether the EFA is involved in school developments on protected land in London but we believe they are involved in at least 9 of the threats we have identified. More generally our concern is that

the need for school places is a general pressure across London and cannot be regarded as the 'exceptional circumstances' required by national Green Belt policy to justify building on protected land.

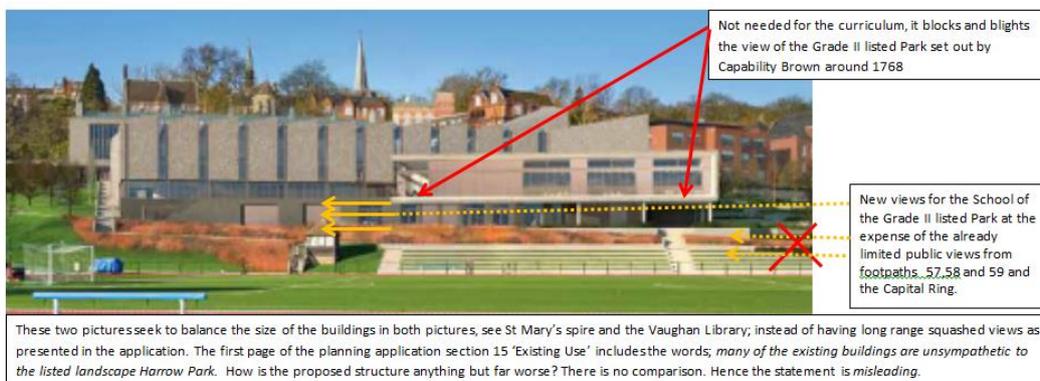
- Unrealistic housing targets are forcing the unnecessary release of Green Belt land.** 12 of the threats relate to proposed residential development with another 2 threats arising from combined residential/school proposals. Many of the larger sites coming under threat have been identified by the local authority as sites which are necessary to accommodate housing targets. CPRE has consistently demonstrated that councils are being required to allocate double, or more, the number of sites actually likely to be needed. For example, assuming the 2015/16 build rate (580 units per year) is maintained in the London Borough of Redbridge, the council is proposing to allocate enough land for a 32 year supply of sites (for a total of 18,936 new dwellings) in their Local Plan to 2030 i.e. for 13 years. Put another way, to achieve the expectation that 18,936 will be delivered in the plan period, the 580 build rate would need to increase by 2½ times. Even if build rates were consistently to reach 1,200 per year in Redbridge, the plan would provide for a supply of sites for housing for 16 years i.e. well beyond the plan period.

## SOME SITES CURRENTLY UNDER THREAT IN GREATER LONDON

This section provides further details of some examples of the sites we have identified as under threat from development as reported by the local campaigners working to save them.

### HARROW SCHOOL

Paul Catherall is campaigning on behalf of Harrow Hill Trust to save a Capability Brown Landscape on Metropolitan Open Land. He said: "Harrow School are proposing to build a much larger replacement sports facility and conference centre in beautiful Metropolitan Open Land. We want a brownfield option adopted instead. The Planning Inspectorate agreed that the existing views were 'exceptional' and 'spectacular' and these will be lost for us and for future generations. The construction will blight the Eastern slope of the hill which is the setting for several historic buildings on the ridge and which is adjacent to Harrow Park, a grade II listed park set out originally by 'Capability' Brown around 1768. Please support our petition which can be accessed via [www.harrowhilltrust.org.uk](http://www.harrowhilltrust.org.uk)."



## ST MARY'S UNIVERSITY, STRAWBERRY HILL

**Michael Allsop** represents the Strawberry Hill Residents Association (SHRA) who are campaigning against St Mary's University's plans for development of student accommodation blocks on MOL which will see the loss of playing fields and the athletics track which was recently renamed in honour of Sir Mo Farah who trained there. "The site is part of the original estate of famous 18th century man of letters Horace Walpole, adjacent to his grade 1 listed Strawberry Hill House and gardens, and an important link in a largely unbroken wildlife chain running from Wimbledon Common, over the Thames and up to Hounslow Heath." They argue that student accommodation has recently been constructed and is available nearby in areas with many more facilities available to students.

[www.shra.org.uk](http://www.shra.org.uk)



The Sir Mo Farah running track which would be lost along with green space if the plans go ahead.

## BOWRINGS SPORTS FIELD AND FLOOD PLAIN, GREENWICH

**Marcia Laming** has lived next to the Bowring sites for 14 years. "I am very lucky as one of a small group of Londoners who look out onto a field. It plays an active part in the community as a sports and leisure area and is a vital part of the local flood management plan. In December 2015 we all received a note through the door informing us that the sports field in front of our houses had been 'acquired' by the International Academy of Greenwich (IAG) and that they were intending to build a 'small' school on the field. It didn't make sense as the land is classed as Metropolitan Open Land and we all believed that this meant that building on it would only be allowed in exceptional need. The land is also an active flood plain, with a flood defence wall running through it, and is surrounded by residential housing with very limited access. After contacting AIG and asking for further information it became apparent they were looking to build a substantial school, 4 stories high, to house 875 students. This was a terrible shock to the local resident who felt that at no point had they even been consulted on the proposal which would obviously have a massive impact on their lives."

[www.facebook.com/SaveBowringSportsGround](https://www.facebook.com/SaveBowringSportsGround)



**VIEW OF BUILDING / OBSTRUCTION FROM 8 HAMLEA CLOSE**



## LEYTON MARSH, WALTHAM FOREST

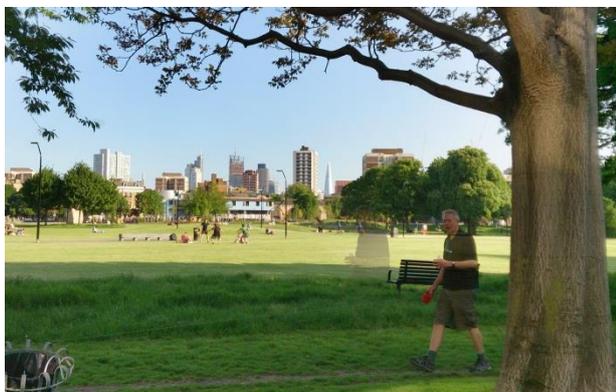
**Abigail Woodman** is a member of Save Lea Marshes. “We are a group of individuals who campaign to ensure that the marshes of the Lower Lea Valley - Tottenham Marsh, Walthamstow Marsh, Leyton Marsh and Hackney Marshes - remain open and green. We are currently fighting the Lea Valley Regional Park Authority’s plan to sell off parts of Leyton Marsh for housing. The LVRPA wants to sell off this Metropolitan Open Land, close to a nature reserve, to fund a new ice rink which they intend to build on more Metropolitan Open Land. The Lea Valley Park Authority was established, by Act of Parliament, to protect the land within the Park boundaries as a green lung for London. However, it seems far more interested in building large-capacity sporting venues. If the plans are approved, then the spectre of our marshes disappearing under high-rise tower blocks comes one step closer; something none of us involved in Save Lea Marshes want to see happen. We want to make sure the marshes are there for future generations to enjoy.”

[www.saveleamarshes.org.uk](http://www.saveleamarshes.org.uk)



## SHOREDITCH PARK, HACKNEY

While not Green Belt or Metropolitan Open Land, Shoreditch Park is nonetheless an important green open space in central London. CPRE London is objecting to the council’s proposals to build on the ball courts which would take a significant chunk from what is the only wide open space or park to be found across a large area of central London. Ball courts are an integral and well-used element of London parks and in all likelihood the council will need to find space elsewhere in the park’s green fields for ball courts.



The proposed development: the ball courts, which would be built over can be seen bottom right.

## NORTHFIELD ALLOTMENTS, EALING

The Pathways Housing Association is proposing to build on 10% of the Northfield Allotment site in West Ealing, given by the Bishop of London to the people of Ealing in 1832 and believed to be the oldest allotments in London. 60% of the original allotments site was lost to development in the 1970s following compulsory purchase. The site has recently been acknowledged by Ealing Council as an Asset of Community Value. [www.ealingdean.co.uk](http://www.ealingdean.co.uk)



## GLEBE LAND, ENFIELD

**Keith Bilton** is a Committee Member of Enfield RoadWatch and is campaigning to save the Glebe Land in Enfield from development. “I felt I needed to preserve this land for future generations.” Enfield RoadWatch was formed initially to prevent the inappropriate building of 300 homes and a secondary school on precious Green Belt land in Enfield.



“We are not opposed to building schools or housing but believe all avenues should be explored before destroying the Green Belt is considered. In conjunction with CPRE, we have assisted similar groups and brought the attack on Green Belt to the forefront of local news. We will continue to campaign to raise awareness of the benefits of Green Belt, not just that in Enfield.” [www.enfieldroadwatch.co.uk](http://www.enfieldroadwatch.co.uk)



## OAKFIELD SPORTS GROUND, REDBRIDGE

**Chris Nutt** is the Secretary of the Save Oakfield Society and has worked for two years to save the site which hosts seven of the best cricket pitches in London, used by people from all corners of London and beyond. “The campaign has attracted thousands of supporters and the interest of the press and TV.” Chris set up the Society two years ago to save Oakfield which is a high quality sports ground of 62 acres in the Green Belt of Hainault Fields in East London enjoyed by thousands of people every week. Chris said: “It is protected by a restrictive crown covenant and registered as an asset of community value, yet Redbridge Council has listed it as a development opportunity site. We have a strong case and are now awaiting the call of the Planning Inspector.”



[www.facebook.com/SaveOakfieldSociety](https://www.facebook.com/SaveOakfieldSociety)



## WARREN FARM, EALING

**Carolyn Brown** is campaigning with 1,700 residents and supporters in Hanwell and Ealing to save Warren Farm School Sports Centre in West London. “It is completely wrong that Ealing Council should be able to give away, and allow a company to destroy for profit, a public asset in this way.” Ealing Council plans to lease these 61 acres of publicly-owned land to the commercial organisation QPR Football Club, for 200 years at no rent and for a time-limited, unspecified, investment in community sport. It is protected Metropolitan Open Land, part of Brent River Park, designated Community Open Space and a Site of Importance for Nature



Conservation supporting a diverse grassland ecosystem. Carolyn has fought against huge odds, is still fighting and currently raising funds to appeal a court decision.

[www.crowdjustice.org/case/appeal-to-save-warren-farm](http://www.crowdjustice.org/case/appeal-to-save-warren-farm)



## WHAT NEEDS TO HAPPEN NOW?

The Strongest Protection? (March 2016) made a number of recommendations which remain salient. Since then, there has been an increase in threats arising through the Local Plan process resulting from the pressure to allocate sites for unrealistically high housing targets. Challenging these figures requires political action.

- The current Mayor's strong commitment to protecting Green Belt and Metropolitan Open Land is a welcome first step. Evidence shows that when developers and landowners receive the wrong signals from political leaders - and are led to believe protections might be loosened - speculation and opportunism arises, increasing pressure on protected land. ***The London Mayor, and his successors, must continue to send a clear message that they will not allow unnecessary and inappropriate development of London's vital Green Belt and green spaces.*** These messages must be backed up by action: the Mayor should make more use of his powers to refuse applications for unnecessary and inappropriate development.
- The Government's national planning and housing policies are pushing Borough Councils to say they have no choice but to allocate protected land for housing when preparing their local plans. Councils are forced to identify many more sites than are needed which simply gives developers a wider range of sites to choose from. This does not increase the rate of housebuilding but means that brownfield sites are left idle while greenfield sites are developed. This is the worst of all worlds. ***The supply of sites must be based on realistic targets and councils should not be required, as is currently the case, to allocate sites for double the number of homes that are likely to be built.***
- Borough Councils need to prioritise the reuse of wasted space in their areas for new housing and associated green infrastructure. This should be based on a thorough survey of existing and new brownfield sites suitable for new development, including all the potential sources such as opportunities for increasing the capacity of low density development. ***There should be a clear requirement that all suitable brownfield sites are built out before any green space is considered for development.***
- CPRE London advocates the ***creation of a Strategic Green Belt Authority to coordinate planning and investment.*** The aims should be to halt the piecemeal erosion of London's Green Belt, promote the sustainable use of land within it, and increase the benefits it brings for the wellbeing of Londoners
- This should go alongside ***increased investment in urban regeneration*** and stronger planning powers to ensure we can take full advantage of the huge opportunities in London to regenerate run-down neighbourhoods and brownfield sites, delivering the housing and infrastructure we need while improving our green spaces.
- Protected sites are still being acquired for schools. The recommendation in our original reports stands, namely that ***the Government's Education Funding Agency should cease acquiring protected sites in London for schools and effectively bypassing the local planning process.*** Additionally, the Secretary of State should clarify that the need for school places cannot justify building on protected land, either via a Local Plan site allocation or a planning application.