

**MEMBER BRIEFING**

**LONDON'S GREEN BELT AND  
METROPOLITAN OPEN LAND**

**TIME FOR  
RENEWAL**

# London’s Green Belt and Metropolitan Open Land – Time for Renewal

## CPRE London Member briefing

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### GLOSSARY

ALGG	All London Green Grid
CPRE	Campaign to Protect Rural England
MOL	Metropolitan Open Land
NPPF	National Planning Policy Framework
PPG	Policy Planning Guidance
SPG	Supplementary Planning Guidance

## SUMMARY

The aims of the Green Belt have changed over time. They have widened to include multiple benefits for the natural environment, for people, for defining urban boundaries and preventing urban sprawl. Current national policies, the National Planning Policy Framework (NPPF) and Localism Act, have given greater responsibility to individual London boroughs to define the role and protection of Green Belt and large areas of 'Metropolitan Open Land' (MOL) within their local plans and planning decisions. It is down to local councils to clarify what might be 'inappropriate development' in the Green Belt at the edges of London and to the open land within London. It is also up to them to clarify the 'very special circumstances' that might allow development on protected land. This local interpretation of policy is a real concern where London boroughs face ever-greater pressures to meet increasing housing and infrastructure targets.

In this paper CPRE London reviews current changes to London's Green Belt and Metropolitan Open Land (MOL). We argue that there are still considerable opportunities for designing compact liveable neighbourhoods within London whilst also promoting our precious green spaces and corridors. Our key recommendations are:

1. **Reduce policy uncertainty:** incorporate PPG2 wording into London Plan and development guidance and clarify Green Belt development exemptions
2. **Connect up London's landscapes and Green Belt:** Plan positively for green connectivity
3. **Track and fund connectivity:** Monitoring All London Green Grid SPG implementation and identify additional resources
4. **Incorporate 'liveability' objectives within development:** Supporting neighbourhood inclusion and wellbeing, increased local powers, finance and quality of affordable homes
5. **Improve local environmental participation:** Fulfilling the right to participate.

## Call to action!

CPRE London needs our members and Londoners to get involved in promoting the Green Belt and Metropolitan Open Land. Things you can do:

- **Track local developments:** monitor development proposals in and around London's Green Belt and Metropolitan Open Land and local plan changes in your local area, and keep us informed: [office@cprelondon.org.uk](mailto:office@cprelondon.org.uk) or Tel: 0207 253 0300
- **Seek local funding:** There are various grants available to enhance your local Green Belt and green spaces, as well as encourage greater local use and involvement (see CPRE London: '[Living London](#)' paper for ideas)
- **Get involved in local planning:** You can get involved in local neighbourhood plan and Local Plans, to encourage greater investment in local green spaces and connecting them up with MOL and Green Belt if they are present in your Borough.
- **Join CPRE London now!** If you aren't already a member, join us for a little as £3 a month and help fight for London's green spaces!

## **Briefing aim**

This document aims to provide CPRE London members and others with a background to London's Green Belt and Metropolitan Open Land (MOL). It is an update on current policy and legislation relating to the role and protection of Green Belt and MOL, considering the current status of this land and its future role. It discusses how the GLA, London boroughs, and CPRE London members can further support effective management and enhancement of London's strategic open spaces.

### **1. LONDON'S GREEN BELT – BACKGROUND AND HISTORY**

The Green Belt is a permanent area of open land that surrounds an urban area. Early aims for this land were to limit uncontrolled urban growth or 'urban sprawl' into rural areas. In London, the Green Belt dates back to pre-war initiatives that sought to retain a good quality rural landscape that was clearly separate from urban areas. Its purpose and protection has evolved (see the timeline below). According to the current National Policy Planning Framework (NPPF);

*“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 five purposes of the Green Belt are defined as to:

1. Check the unrestricted sprawl of large built-up areas;
2. Prevent neighbouring towns merging into one another;
3. Assist in safeguarding the countryside from encroachment;
4. Preserve the setting and special character of historic towns; and
5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

**Table 1. Key Green Belt and Metropolitan Open Land policies**

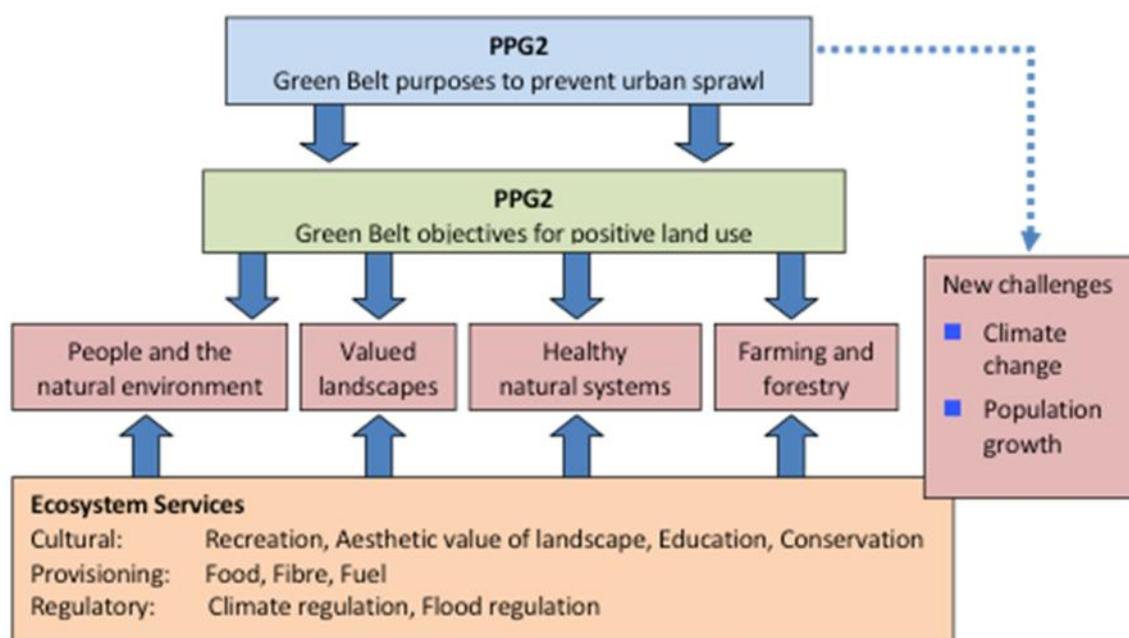
<b>Policy</b>	<b>Reference</b>
<b>National Planning Policy Framework</b>	Ch. 9 Para 81 – 92 Role of local authorities to plan 'positively to achieve benefits from Green Belt land, including access, sport, and enhancement of landscape (NPPF para 81) Demonstrating 'Exceptional Circumstances' for development (NPPF para 82) Exceptional circumstances test (NPPF para 83 – 86) Very special circumstances test (NPPF para 87 – 92)
<b>London Plan</b>	Policy 7.16 on Green Belt and Policy 7.17 on Metropolitan Open Land (Ch. 7, London Plan) All London Green Grid Supplementary Planning Guidance (SPG)

Sources: NPPF (2011), London Plan 2011, CPRE London 2013

Views on the purpose of the Green Belt are changing and often conflicting. Some argue that it is a 'blunt' tool that blocks vital access to land (Amati and Taylor, 2010). However, others point to increasing threats to local food security and the environmental impact of

transporting food over long distances, suggesting that local food production remains essential. The Green Belt around London and elsewhere is no longer simply about food production and constraining urban growth. Different types of open land provide multiple ‘eco-system services’ that are necessary to support our urban resilience and wellbeing, both now and in the long term. These “services” include urban cooling, improved air quality, carbon absorption (especially woodland areas), local food production, flood protection, tourism, health and recreational values (See Fig 1). It is this changing view - recognising the multiple purposes of Green Belt and its connections to other green spaces - that needs to be better reflected in policy, regulation and practice. This is particularly true of London where land is such a precious asset.

Fig.1 Green Belts and Ecosystem Services are mutually reinforcing



Source: Natural England and CPRE, 2010

## 2. CURRENT STATUS AND CHALLENGES

*“The need for green space protection to be a cornerstone of urban-region planning is as urgent as it was in the 1930’s.” (Amati & Taylor, 2010)*

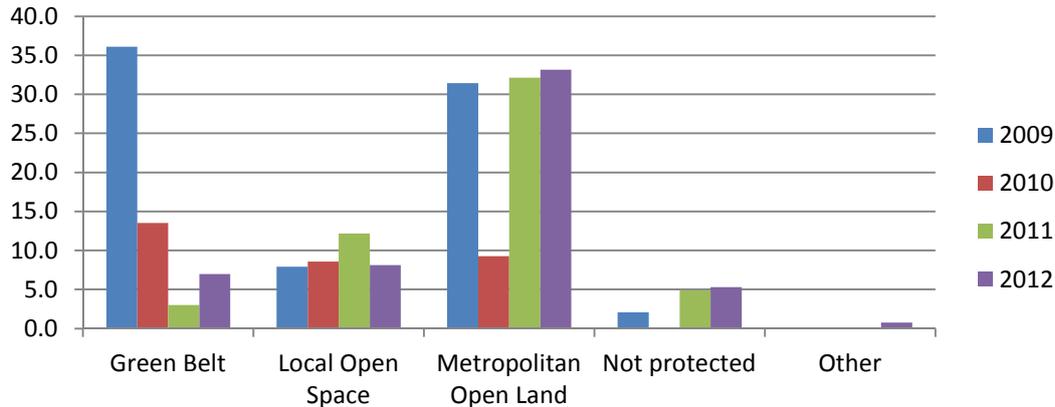
London’s Green Belt covers **35,170 hectares** of land, 2% of England’s total 1.6 million hectares of Green Belt (DLCG, 2014). The land is made up of arable and horticulture (38%), broadleaved, mixed and coniferous woodland (21%), ‘improved’ grassland (17%), semi-natural grass (14%), built up areas with woodland (8%), heath and bogs (1%), and standing water (1%), Over the last five years this area of land has slowly reduced. The total gross loss of London’s ‘Open Spaces’ in a four year period (2009 to 2012) is **215.5 hectares**. The most significant loss has been to Metropolitan Open Land (106 ha), followed by green belt (60ha) (see Chart 1). Between 2009 and 2012 the largest type of development on London’s open spaces has been housing (32%), followed by mixed-use sites, which include housing, and sports-related developments (see Chart 2).

## London's Green Belt time line



Adapted from: LB Redbridge (2010), Natural England and CPRE (2010)

**Chart 1. Open space loss (hectares) by land type (2009-2012)**



Source: London Development Database (2013)

CPRE London is receiving increasing numbers of reports from members of the public who are concerned about losses to the Green Belt and Metropolitan Open Land (MOL) within Greater London. Recent reports of sites with planning applications and sites at risk include:

- Wormwood Scrubs, LB Hammersmith & Fulham (Old Oak Common interchange, QPR stadium)
- Crystal Palace Park MOL, LB Bromley (private sector development)
- Land between Tile Kiln Lane and South Of Dartford Road, LB Bexley (cemetery expansion)
- William Gladstone Open Space MOL, LB Brent (New Gladstone School proposed)
- Cane Hill, Coulsdon, LB Croydon (housing development)
- Warren Farm, Windmill Lane, LB Ealing (QPR training ground)
- Whitechurch Playing Fields, LB Harrow (private sports development)
- Land adjacent to Wennington Farm, Upminster, LB Havering (gravel pit proposal)
- Rectory Farm, Heston (Minerals extraction and restored parkland); The Hartlands (gypsy and travellers extension), Cranford and Heston; also land around Heathrow (third runway proposals) LB Hounslow
- Five Green Belt sites under review in the Local Plan, LB Redbridge (housing development)
- Colne Valley Regional Park, LB Hillingdon & Buckinghamshire (Heathrow runway, HS2, Slough International Freight Exchange & Pinewood)

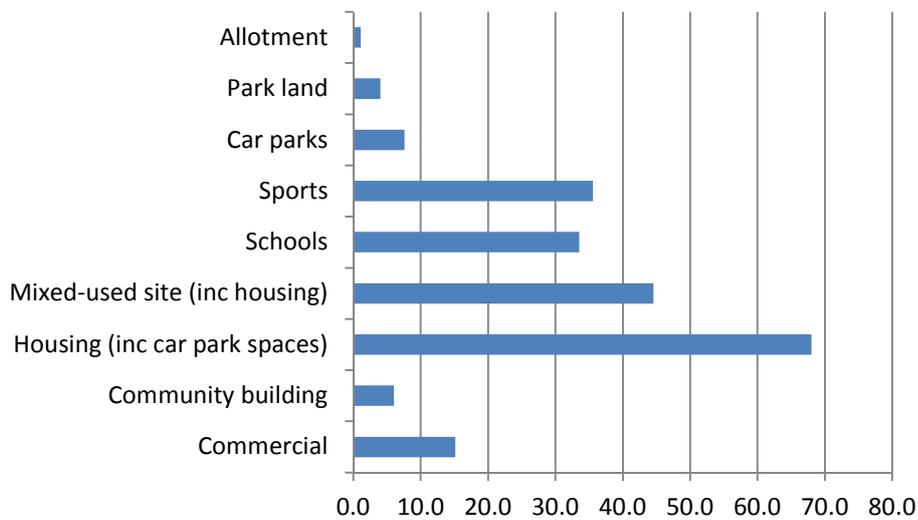
Beyond the M25 the Green Belt surrounding London in the South East is also threatened. This includes around 6,000 new homes which are proposed to be built on Green Belt land between Hitchin and Stevenage. A further 240 hectares of Green Belt could be lost if Gatwick gets approval for a second runway after 2019, as set out in the Aviation White Paper. HS2 will further impact Green Belt land around the Colne Valley

In terms of the scale of change, proposals for Heathrow look the most significant; *“One of the largest and most controversial infrastructure proposals in England, a third runway at Heathrow Airport, would have a significant effect on Green Belt land if permitted, both in*

terms of the location of the runway itself and in the sourcing of construction material from extraction sites in other Green Belt locations.” (Natural England & CPRE, 2010).

While a relatively small total area of London’s Green Belt land has been lost in the last decade, each site that is split up and reduced leads to a steady but incremental loss of land that cannot be replaced. The London Plan is clear that “*The Mayor strongly supports the current extent of the London’s Green Belt, its extension in appropriate circumstances and its protection from inappropriate development*” however CPRE London remains concerned that every new case where development is allowed sends a message to local authorities that they can use similar arguments of ‘very special circumstances’ in their own boroughs.”

**Chart 2. Total open space lost (hectares) by development type between 2009- 2012**



Source: London Development Database (2013)

### **2.1 Local Green Belt boundary reviews**

In 2011, in response to a formal request by Policy Exchange to build on the Green Belt a Government spokesman said:

*“We have no plans to change Green Belt protection. It plays a valuable role in stopping urban sprawl. But we recognise that our cities have a vital role in delivering the economic recovery our country needs and we are giving them more powers to act as real engines for growth...We will be inviting councils and communities to identify opportunities for locally planned large scale development, which will take advantage of streamlined planning processes, giving communities a stronger say and developers greater certainty.*”

All local authorities are reviewing their Local Plans and Core Strategies to take account of the changes outlined in the National Planning Policy Framework (NPPF), Localism Act and the London Plan. To date nine London Boroughs have reviewed the Green Belt and Metropolitan Open Land boundaries in their areas, sometimes as part of their Local Plan process. Positively, five of these councils have made only minor boundary changes to re-designate developed sites and two of them have also added new land (Lewisham and Sutton). The London Boroughs of Barking and Dagenham, Croydon and Hounslow all decided no boundary

changes were necessary, as Hounslow indicates: *“The 2012 Green Belt Review which found that no boundary changes were required as all boundaries are deemed to be both strong and permanent to endure the length of the plan”*. Barking and Dagenham stated *‘Given our priority to address our housing needs through the use of previously developed land we have therefore not carried out a survey of Green Belt / MOL boundaries.’*

### **Case study 1. Redbridge Green Belt boundary review**

London Borough of Redbridge has been undertaking a review process since 2010 and will be consulting on their proposals in 2014, as part of their Core Strategy Review. They have reviewed and selected five sites where they propose to remove the Green Belt designation in all or part of the site:

- Beal High School & Redbridge Recreational Grounds
- Repton Park Estate
- Oakfields Playing Fields & Redbridge Sports and Leisure Centre
- King Solomon & Ilford Jewish Primary School Playing Fields
- King George & Goodmayes Hospitals (Stage 5 GB Review)

Whilst some of the land in these sites may have already been developed and therefore may no longer fulfill its original Green Belt functions, the proposal to reclassify other land, such as playing fields, is concerning. Redbridge in the east has a number of areas where there is a green space deficit and a lack of alternative sports / recreation grounds. Whilst Redbridge has to meet new housing targets, it remains unclear as to what degree it has sought alternative ‘brownfield’ sites first. Furthermore its classification of some of the Green Belt land as ‘mown grassland and playing fields with diminished habitat value’ appears to detract from the NPPF policy on Green Belt enhancement. The NPPF states; *“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.”* (paragraph 81).

In comparison to Redbridge, the London Borough of Haringey talks explicitly about extending boundaries. Their Local Plan SP13 on ‘Open Space and Biodiversity’ states; *‘All new development shall: Protect and enhance, and when and where possible, extend the existing boundaries of the borough’s Green Belt, designated Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces from inappropriate development’*.

## **2.2 Green Belt incursions and very special circumstances**

The National Planning Policy Framework (NPPF) commitments to the Green Belt are more ambiguous than those in the Planning Guidelines that preceded it (CPRE 2012). 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’*. Furthermore the plan provides the same protection for Metropolitan Open Land in policy 7.17. So it is left to the discretion of each London Borough to decide what ‘circumstances’ are sufficiently ‘special’ to allow for development.

Paragraph 47 of the NPPF says that local councils must continue to maintain a rolling 5-year supply of housing land, calculated against their housing requirements. An additional buffer of 5% further homes (in some cases as much as 20%) is required to ensure sufficient choice

and competition (Savills 2012). Councils may decide that their Green Belt or MOL land can be used for housing as long as ‘Very Special Circumstances’ has been demonstrated. However with the loss of Planning Policy Guidance 2 (PPG2) we have also lost clarity about the definition of what is ‘inappropriate development’ and ‘very special circumstances’ that might override ‘inappropriate’ proposals.

PPG2 stated *“inappropriate development is by definition harmful to the Green Belt. It is for the applicant to show why permission should be granted. Very special circumstances will not exist ‘unless the harm... is clearly outweighed by other considerations’.* PPG2 also helped to clarify how **brownfield sites** within Green Belt should be treated and *“remain subject to development control policies for Green Belts”.*

With regard to **infilling** of sites PPG2 stated that a proposal should:

- a) have no greater impact on the purposes of including land in the Green Belt than the existing development;
- b) not exceed the height of the existing buildings; and
- c) not lead to a major increase in the developed proportion of the site.

As regards the **redevelopment** of a site PPG2 stated that sites should:

- a) have no greater impact than the existing development on the openness of the Green Belt and the purposes of including land in it, and where possible have less;
- b) contribute to the achievement of the [beneficial] use of land in Green Belts;
- c) not exceed the height of the existing buildings; and
- d) not occupy a larger area of the site than the existing buildings (unless this would achieve a reduction in height which would benefit visual amenity).

PPG2 advised taking account of: the character and dispersal of proposed redevelopment; as well as that the location of new buildings should be decided having regard to the openness of the Green Belt and the purposes of including land in it, the objectives for the use of land in Green Belts, the main features of the landscape, considering the site ‘as a whole’ and highlights issues like visual amenity, and traffic and travel implications.

### **Case 2. Ockendon Kennels (LB Havering) Very special circumstances**

A proposal to build 30 affordable homes on Green Belt land (Ockendon Kennels, Ockendon Road, Upminster, planning application no: P0742.13) was refused planning permission by Havering Council on the following grounds:

*“Owing to the heights of the proposed buildings, the intensity of the proposal’s layout, and the extent of development compared to the existing built development, it is considered that the proposal would have significant adverse impact on the openness of the Green Belt and be contrary to the purposes of including land within it. The proposal is considered inappropriate development and would also be harmful to the visual amenities of the Green Belt and the surrounding area. Very special circumstances have not been demonstrated in this case”*

Havering’s decision is in accordance with the NPPF which states that the erection of new buildings will constitute inappropriate development in the Green Belt, unless it is possible to demonstrate the development: *“would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing building.”* (NPPF Para 89). It also states; *“The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes”* (NPPF Para 109).

The NPPF has however retained a number of exemptions where development on the Green Belt may be deemed allowable (see Table 2).

**Table 2. Green Belt development exemptions (NPPF)**

<b>Green Belt development exemptions</b>	
<b>Buildings</b>	<ul style="list-style-type: none"> <li>➤ Buildings for agriculture and forestry;</li> <li>➤ Facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;</li> <li>➤ Extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;</li> <li>➤ Replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;</li> <li>➤ Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or</li> <li>➤ Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development..</li> </ul>
<b>Other developments (provided they preserve the openness of the Green Belt and don't conflict with the purposes of including land in Green Belt)</b>	<ul style="list-style-type: none"> <li>➤ Mineral extraction</li> <li>➤ Engineering operations</li> <li>➤ Local transport infrastructure which can demonstrate a requirement for a Green Belt location</li> <li>➤ Re-use of buildings provided that the buildings are of permanent and substantial construction</li> <li>➤ Development brought forward under a Community Right to Build Order.</li> <li>➤ Renewable energy projects</li> <li>➤ Community forests</li> </ul>

Source: NPPF Ch.9 Protecting the Green Belt

### **3. FUTURE OF LONDON'S GREEN BELT – CPRE LONDON RECOMMENDATIONS**

CPRE London believes that London's Green Belt and Metropolitan Open Land (MOL) are as important if not more important than they have ever been. Policy makers, planners, landowners and developers need to re-examine the core functions of the Green Belt, how it can be restored, enhanced and better connected to open spaces within London.

#### **3.1 Reduce policy uncertainty**

The interpretation of the National Planning Policy Framework (NPPF) and the definitions of 'inappropriate development' and 'very special circumstances', leave London's large green space protection at the discretion of individual authorities, when weighing up what benefits outweigh the original intended purposes of the land (including maintaining their openness, permanence and preventing urban sprawl, NPPF Para 87).

#### Recommendations

PPG2 wording: Guidance, as outlined in the former PPG2, should be reinstated within the London Plan and London Borough Local Plans to clarify the consideration of extensions,

infilling and redevelopment of brownfield or existing properties on Green Belt land and Metropolitan Open Land. The GLA should offer clear guidance, using PPG2 wording, on ‘inappropriate development’ and ‘very special circumstances’ in line with the London Plan policy.

*Clarify Green Belt development exemptions:* there is a lack of clarity regarding the interpretation of key words in the NPPF guidance, such as ‘disproportionate’, ‘materially larger’ and ‘limited’. These words need to be quantified by clear proportions e.g. a maximum increase of 5% of the current site, provided the proposal preserves the openness and functions of the Green Belt land.

### **3.2 Connecting up London’s landscapes and Green Belt**

At the heart of the vision for the All London Green Grid (ALGG) is the objective to link up green spaces for the benefit of wildlife and people, including connecting to the Green Belt. The Supplementary Planning Guidance (SPG) states:

*“To create a well-designed green infrastructure network of interlinked, multi-purpose open and green spaces with good connections to the places where people live and work, public transport, the Green Belt and the Blue Ribbon Network, especially the Thames. This will provide a richly varied landscape that will benefit both people and wildlife providing diverse uses to appeal to, and be accessible by, all.”*

A larger number of outer London boroughs refer to the Green Grid in their Open Space Strategies or Local Plans than inner boroughs. There needs to be a clearer link between London’s planning guidance and the ALGG SPG and improved monitoring of its progress. Whilst some regions - such as the original green grid area in East London along the Lee Valley and the Wandle Valley - are trying to enhance their connectivity and value, there remains a lack of central mechanism to monitor and encourage further progress.

*Recommendation: Plan positively for green connectivity*

In accordance with the NPPF, CPRE London calls on the London Mayor, London boroughs and neighbouring counties and districts to plan positively for London’s Green Belt and MOL within the revised London Plan, Local Plans, and Development guidance. They need to prioritise the effective management and connecting up of existing and new green spaces in a strategic way within and between boroughs, as outlined in the All London Green Grid SPG.

### **3.3 Track and fund connectivity**

Current London Plan guidance on green infrastructure, including the Green Belt, recognises that it has multiple values and functions. DEFRA recently released a report ([DEFRA 2013](#)) outlining how green infrastructure contributes directly to **local economic growth** in a number of ways, including attracting businesses, workforce, health and educational benefits, as well as numerous potential ecosystem services, such as flood protection, air quality, food production etc (see also CPRE London’s [Living London](#) paper).

Such ‘natural capital’ assets are still poorly assessed and not factored into local budgeting and monitoring processes, to ensure effective delivery of policies. Policies in themselves will

not deliver real results on the ground without adequate resources (human, technical and financial) attached to them. The action plan attached to the London Plan 2011 indicated that few additional resources would be made available to deliver the ALGG at a local level, such as the Big Green Fund. A special levy was created in the 1968 to fund Lee Valley Regional Park’s (East London Green Grid) creation and management. The precept is currently paid by council tax payers in London, Essex and Hertfordshire, although the sums raised from it have decreased in recent years in line with wider public sector spending cuts. Funds raised have made a valuable contribution to the development of the Olympic Park and sports facilities in in the Lee Valley. However councils such as Wandsworth and Croydon (for the Wandle Valley) have argued that the proceeds of the levy should be paid to the relevant authorities in each of twelve green grid areas of the ALGG and not just the Lee Valley (see **Table 3** below).

Recommendations:

- Regularly monitor All London Green Grid SPG progress: London Boroughs and the Mayor need to regularly monitor how new developments impact on and contribute to green infrastructure connectivity in each of the twelve green grid areas.
- Identification of additional resources: targeted resources are required to support connectivity within and between the green grid areas. This could include a revision of the 1968 act of parliament that established the Lee Valley levy to allow for funding of all twelve ALGG areas, as well as the identification of new financial mechanisms to fund connected green infrastructure (e.g, green municipal bonds).

**Table 3. London Green Grid regions and functions**

<b>12 Green Grid Areas</b>	<b>Green Grid Functions</b>
GGA1 Lee Valley and Finchley Ridge	Adapt to climate change and promote urban greening
GGA2 Epping Forest and Roding Valley	Increase access to open space
GGA3 Thames Chase, Beam and Ingrebourne	Conserve and enhance biodiversity and increase access to nature
GGA5 River Cray and Southern Marshes	Improve sustainable travel connections
GGA6 South East London Green Chain	Promote healthy living
GGA7 London’s Downlands	Conserve and enhance heritage features, geodiversity and landscape character
GGA8 Wandle Valley	Enhance distinctive destinations and boost the visitor economy
GGA9 Arcadian Thames	Promote sustainable design, management and maintenance
GGA10 River Colne and Crane	Enhance green space and green infrastructure sector skills
GGA11 Brent Valley and Barnet Plateau	Promote sustainable food production
GGA12 Central London	Improve air quality and soundscapes
	Improve the quality of and access to the urban fringe
	Conserve and enhance the Thames riverside spaces

Source: ALGG SPG (2012)

**3.4 Incorporate ‘liveability’ objectives within development**

London Boroughs are facing potentially conflicting requirements from NPPF and the London Plan to produce five-year rolling housing targets at the same time as being asked to plan positively for the beneficial use of Green Belt land, and invest in the enhancement of local natural environment and landscape. How these potentially competing objectives are managed is vital.

Economic assessments of housing ‘viability’ rarely factor-in the social and environment impacts of development at particular sites. This can result in a failure to fully assess the advantages of developing of brownfield sites as compared to green spaces and Green Belt. Housing development must not ignore the essential functions of Green Belt and green spaces. CPRE London does not believe that opening up the debate about London’s Green Belt boundaries will produce a change in the rate of house building or result in a better quality of life for Londoners or the surrounding regions. Planner Andrew Lainton’s review of Green Belt land examined how much land is actually viable to develop for housing, and found only a very small proportion would be suitable (approx. 1km<sup>2</sup> within the M25). We argue that London must continue to protect the core aims of the Green Belt – preventing urban sprawl and keeping a clear separation between rural and urban areas, as well as adjoining developments. These aims are even more relevant than in the past.

As the Mayor’s draft London Housing Strategy states, we need to avoid repeating the mistakes of the past by not simply playing a ‘numbers game’ of building more houses. Instead we need to focus on the process of identifying who the new homes are for, where they is best placed and how they will best contribute to ‘neighbourhood liveability’ over time. CPRE London welcomes the Mayor proposed policy of continuing to focus on developing brownfield sites first (Previously Developed Land) and intensifying the use of existing sites. We agree that there are still considerable opportunities to increase London’s density in the right places, involving local people in the process of intensification and re-design to ensure good quality liveable neighbourhoods.

Cutting across all these issues is the need to put people back at the centre of the housing strategy. Addressing housing needs requires targeted commitment to work with local people to better understand their needs and the best ways to deliver them, in active partnership with Londoners. CPRE London’s [Campaign for a Liveable London](#) is currently in the research phase of a two-year project looking for people-centered solutions to London’s housing crisis. Our emerging research has indicated three inter-related issues that need to be strengthened in the draft London Housing strategy:

Recommendations:

- *Neighbourhood inclusion and wellbeing* - stimulate community ownership in new developments and regeneration projects through investment in community facilitators, community-led governance and participatory budgeting arrangements.
- *Local powers* - increase borough financial autonomy and integrated planning, housing choice, unlocking previously developed land and stalled sites, repurposing suburbs, and introduce better transparency about available land.
- *Finance and quality of affordable homes* - stimulate alternative and longer-term investment models, and creating a ‘liveability league’ table of developers.

### **3.5 Improve local environmental participation**

In 1992 the UK signed up to the Rio Declaration on Environment and Development. The declaration clearly defines the concept of sustainable development and includes a number of principles, in particular Principle 10 – which states that environmental issues are best handled with participation of all concerned citizens, at the relevant level. In Europe, Principle

10 has become formally developed into the 'Aarhus Convention on Access to information, Public Participation in Decision Making, and Access to Justice in Environmental Matters'. The London Plan (para 1.1) refers the Aarhus Convention in its creation. This same Convention equally applies here, not only in the drafting of London wide and local plans, but also in the review of new developments and their impact on the environment.

The London Mayor and London councils need to facilitate and equip local actors with the resources and skills to effectively engage in creating new green spaces and enhancing existing ones. Holding early and on-going dialogue about plans and design with existing residents, neighbourhood groups and other local groups, can support greater community ownership, reduce conflict, build trust, and promote local distinctiveness and innovation. The Green Belt and open spaces can also be places that promote community, entrepreneurship and innovation, including 'local food' production. There needs to be greater flexibility to allow and encourage people to engage with the use of open and derelict spaces near where they live and across London.

*Recommendation: Fulfilling the 'right to participate'*

We need to better understand how people use and engage with green spaces and identify the most effective ways to encourage improved community engagement – including education opportunities, shared communication, in the design and management of sites. The GLA and London Boroughs need to identify effective tools and adopt a more consistent approach to public engagement in relation to the Green Belt and other green spaces across the city, in accordance with the Aarhus Convention.

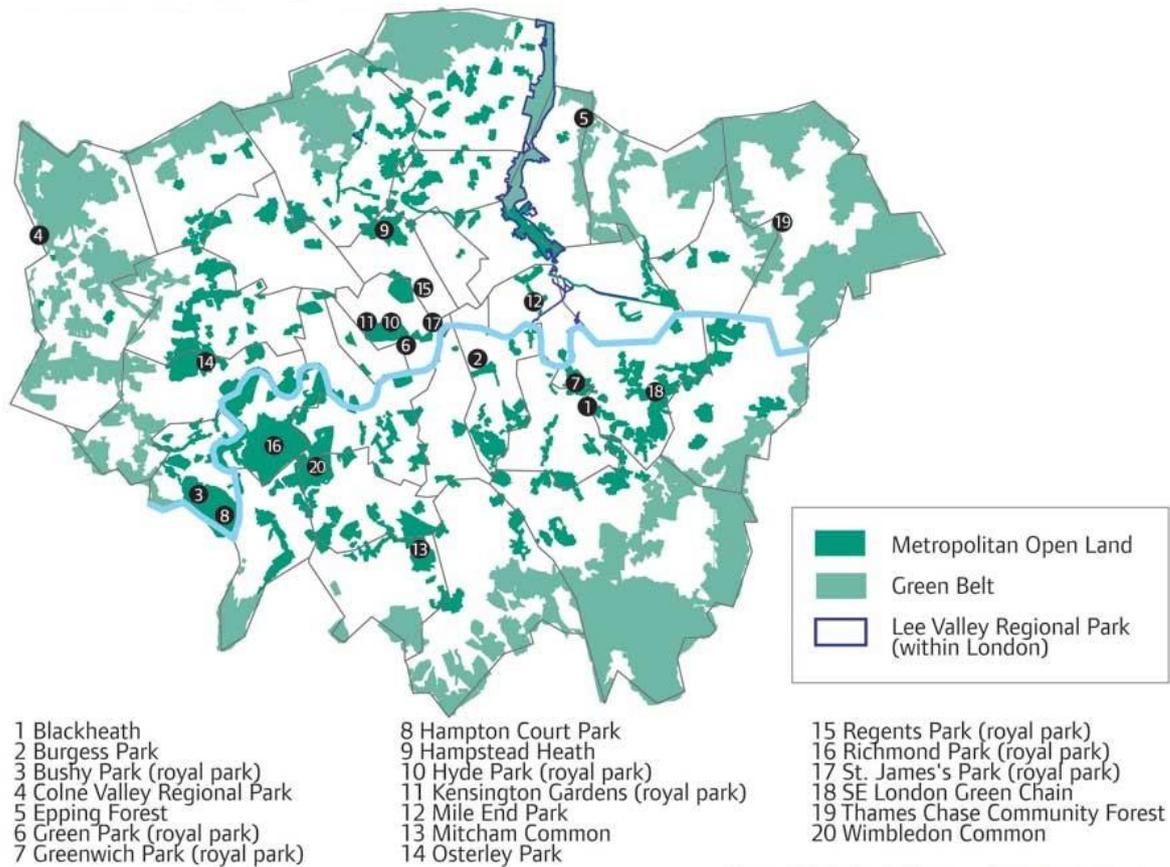
#### **4. CONCLUSION**

It is time to recognise the Green Belt's contribution to London's liveability and its connections with urban green infrastructure. We need to examine how to maximise the benefits of such land for people and the natural environment.

Pressures to develop on Green Belt are growing and as such CPRE members and the public will need to monitor and actively engage in Local Plan reviews and planning applications to ensure the Green Belt, Metropolitan Open Land, and other green spaces are protected.

*"For the first time, I really believe that the warning Philip Larkin gave us in his poem 'Going, going' will come true. The warning that a great wash of concrete and tyres will smother our green places, so 'that will be England gone' will come true, that is - unless we win the fight to oppose it. Chamberlain and Macmillan were right – we should never use the pretext of an emergency to suspend planning."*

Andrew Motion, CPRE President, CPRE AGM July 2013



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www.london.gov.uk/thelondonplan

## CALL TO ACTION!

CPRE London needs our members and Londoners to get involved in promoting your local Green Belt land and Metropolitan Open Land. Things you can do:

- ***Track local developments*** to keep track of development proposals in and around London's Green Belt and Metropolitan Open Land and local plan changes in their local areas, and keep us informed: [office@cprelondon.org.uk](mailto:office@cprelondon.org.uk) or Tel: 0207 253 0300
- ***Seek local funding***: There are various grants available to enhance your local Green Belt and connections of green spaces, as well as for encouraging local use and involvement (see CPRE London: 'Living London' paper for ideas)
- ***Get involved in local planning***: You can get involved in local neighbourhood plan and Local Plans, to encourage greater investment in local green spaces and connecting them up with MOL and Green Belt is they are present in your Borough.
- ***Join CPRE London now!*** If you aren't already a member, join us for a little as £3 a month and help fight for London's green spaces!

## FURTHER RESOURCES

**Greenspace information for Greater London** (GiGL) Online database <http://www.gigl.org.uk/online/>

**How to respond to Planning Applications** (CPRE, 2011) <http://www.cpre.org.uk/resources/housing-and-planning/planning/item/1903-how-to-respond-to-planning-applications>

**Planning Campaign Briefing 2 – Green Belts.** CPRE (2012), June 2012  
[www.cpre.org.uk/resources/housing-and-planning/planning/item/2958-planning-campaign-briefing-2-green-belts](http://www.cpre.org.uk/resources/housing-and-planning/planning/item/2958-planning-campaign-briefing-2-green-belts)

**Green Belts a greener future.** CPRE and Natural England (2010)  
[www.ruaf.org/ruaf\\_bieb/upload/3284.pdf](http://www.ruaf.org/ruaf_bieb/upload/3284.pdf)

**Living London – Green Infrastructure Explained** (CPRE London, 2013) member briefing.  
[www.cprelondon.org.uk/resources/item/2216-living-london-cpre-guide](http://www.cprelondon.org.uk/resources/item/2216-living-london-cpre-guide)

**London Green Belt Council:** [www.londongreenbeltcouncil.org.uk](http://www.londongreenbeltcouncil.org.uk)

**London Gardens:** Info on status and history of London's Parks and Garden  
[www.londongardensonline.org.uk](http://www.londongardensonline.org.uk)

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## ANNEX 1. LONDON BOROUGH GREEN BELT CHANGES

Council	Green Belt area, ha (2011 / 2012)	Average % homes with deficient access to nature (2012)	Green grid area	Green Belt boundary review	Green belt / MOL boundary changes and development threats
City of London	0	100	Central London	-	
Barking and Dagenham*	530	28	Epping Forest and Roding Valley	No	
Barnet*	2380	18	Brent Valley and Barnet Plateau	No	
Bexley*	1120	17	South East London Green Chain	No	<i>Development threats:</i> Land between Tile Kiln Lane and South Of Dartford Road (Cemetery expansion)
Brent	0	18	Brent Valley and Barnet Plateau	-	<i>Development threats:</i> William Gladstone Open Space MOL (New Gladstone School proposed)
Bromley*	7730	18	South East London Green chain	No	
Camden	0	29	Central London	-	
Croydon*	2310	30	Wandel Valley & London's Downlands	No	<i>Development threats:</i> Cane Hill, Coulsdon, (housing development)
Ealing*	330	25	River Colne & Crane, Brent Valley & Barnet Plateau	Yes – changed status of 20ha	<i>Green Belt Review:</i> Re-categorised 20ha of Green Belt land as Metropolitan Open Land <i>Development threats:</i> Warren Farm MOL, Windmill Lane (QPR training ground)
Enfield*	3060	46	Lee Valley	Yes, minor change	<i>Green Belt Review (2012):</i> circa two hectares lost
Greenwich	0	13	South East London Green Chain	-	
Hackney	0	26	Lee Valley	-	
Hammersmith and Fulham	0	36	Central London	Minor MOL changes	<i>MOL change -</i> Linford Christie Stadium (LCS) removed from MOL. Old Oak Community Centre included. Private residences at edge of Hurlingham Park removed. South Park depo and lodge removed. Rowberry Mead Park and Imperial Wharf Park added. <a href="#">2010 review</a> <i>Development threat -</i> Wormwood Scrubs (HS2, Cross Rail)
Haringey*	60	18	Lee Valley	No	
Harrow*	1090	39	River Colne and Crane	No?	<i>Development threats:</i> Whitchurch Playing Fields, LB Harrow (private sports development)

Council	Green Belt area, ha (2011 / 2012)	Average % homes with deficient access to nature (2012)	Green grid area	Green Belt boundary review	Green belt / MOL boundary changes and development threats
Havering*	6010	41	Thames Chase, Beam and Ingrebourne	Y	<i>Green Belt Revisions (2008)</i> . Sites have been removed from the Green Belt: Whitworth Centre; Part of Lot 7 Hornchurch Airfield; Tay Way. <i>Development threats</i> : Green Belt land adjacent to Wennington Farm, Upminster, LB Havering (Gravel ptt proposal)
Hillingdon*	4970	16	Colne Valley	Yes - Minor revision	<i>Green Belt revisions (2006)</i> . Sites removed from Green Belt designation: 470 Bath Road, Longford, 59 Reservoir Road, Ruislip, and Perry Oaks Sludge Works, Heathrow. Sites added to green Belt designation; Existing non Green Belt sites to be upgraded to Green Belt: Hillingdon House Farm, Land to west of Merle Avenue, Harefield, The Dairy Farm Harefield. <i>Development threats</i> : Colne Valley Regional Park, LB Hillingdon & Buckinghamshire (Heathrow runway, HS2, Slough Int Freight Exchange & Pinewood)
Hounslow*	1220	23	River Colne and Crane, Brent Valley	Yes – no major revision	<i>Green Belt Review: (2012)</i> , no major changes <i>Development threats</i> : Rectory Farm, Heston (Minerals extraction and restored parkland); The Hartlands (Gypsy and Travellers extension), Cranford and Heston; also land around Heathrow (Third runway proposals)
Islington	0	32	Central London	-	
Kensington and Chelsea	0	10	Central London	-	
Kingston upon Thames*	640	32	Arcadian Thames	-	<i>Development threat</i> : Thames Water Sewage Treatment Works - limited releases of MOL in the Hogsmill Area
Lambeth	0	37	South East London Green Chain	-	
Lewisham	0	14	South East London Green Chain	Yes – added land	<i>Added MOL</i> : Sydenham Wells Park, Horniman Gardens and Telegraph Hill Park added to in the South East London Green Chain
Merton	0	14	Wandle Valley, Arcadian Thames	-	

Council	Green Belt area, ha (2011 / 2012)	Average % homes with deficient access to nature (2012)	Green grid area	Green Belt boundary review	Green belt / MOL boundary changes and development threats
Newham*	80	39	Lee Valley and Epping Forest & Roding Valley	Yes - MOL	
Redbridge*	2060	18	Lee Valley and Epping Forest & Roding Valley	Yes – 5 poss sites	<i>Green Belt review (2013): Beal High School &amp; Redbridge Recreational Grounds; Repton Park Estate; Oakfields Playing Fields &amp; Redbridge Sports and Leisure Centre; King Solomon &amp; Ilford Jewish Primary School Playing Fields; King George &amp; Goodmayes Hospitals</i>
Richmond upon Thames*	140	11	Crane Valley, Arcadian Thames	No	
Southwark	0	30	South East London Green Chain	No	
Sutton*	616	30	London Downlands, Wandle Valley	Yes – minor MOL change	<i>Minor MOL change: Beddington, Hackbridge</i>
Tower Hamlets	0	35	Lee Valley	-	
Waltham Forest*	840	42	Lee Valley	No	
Wandsworth	0	9	The Arcadian Thames, Wandle Valley and Central London	-	<i>Development threat: Putney Hospital Site, MOL</i>
Westminster	0	27	Central London	-	

\*councils with Green Belt

Sources: Public and member reports, London Development Database (2012) and DCLG (2011)



Bedfont Lakes Country Park © R Callway

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CPRE London is a regional branch of the national charity Campaign to Protect Rural England. The London branch works to promote London's green spaces and liveability for Londoners.

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