



The countryside charity
London

Working for a greener city

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Sadiq Khan
Mayor of London
City Hall
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13 November, 2019

Dear Mayor,

DRAFT LONDON PLAN: INSPECTORS REPORT

I am writing to express our deep concern about elements of the Inspectors Report into your draft London Plan and to urge you to stand firm with respect to your proposed policies to protect London's Green Belt and Metropolitan Open Land (MOL). ***Specifically, we urge you to reject the Panel Recommendations 30, 31, 35, 36, 37, 38 and 46 for the reasons set out below.***

As you may be aware, CPRE London has expressed strong support for your opposition to building on designated Green Belt and MOL. This land, which should be effectively protected through the National Planning Policy Framework (NPPF), faces constant pressure from developers and others seeking short term financial gain from new development when alternative, more environmentally sustainable options are available. We have shown through our research [Space to Build](#) that there is plenty of previously developed land across London which can be used to provide new housing while at the same time improving the environment. And we have gathered evidence that demonstrates that building on the Green Belt causes a significant increase in traffic and does not deliver affordable housing.

The need for a more effective Green Belt policy

We believe the planning system, including strategic plans such as the London Plan, has a vital role to play in safeguarding the long-term public interest in the use of land. Nowhere is this more critical than in protecting precious green space from encroachment. Sadly, as evidence gathered by CPRE across the country demonstrates (most recently in CPRE's report [Space to Breathe](#)) and as our experience of recent and current Local Plan reviews in London confirms, national Green Belt policy has proved unable to resist a significant loss of Green Belt to new development over recent years. This development has also often resulted in car-dependent development which is fuelling unsustainable traffic growth. This is why CPRE London welcomed the more strict approach to protecting the Green Belt set out in Policy G2 of the draft London Plan, and particularly your commitment that 'de-designation' of Green Belt 'will not be supported'.

We therefore strongly object to the Panel Recommendation (PR) 36 which calls for modifications to Policy G2 which in our view would fundamentally undermine your attempt to secure the more effective protection of Green Belt than is being achieved through national policy.



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Moreover, in view of the draft Plan's pioneering approach to making more efficient use of previously developed land, we also firmly object to Panel Recommendations (PRs) 30 and 31 to allow industrial development in the Green Belt. In our view, locating new industrial development in the Green Belt, as proposed by the Inspectors, would undermine your efforts to make better use of existing industrial land through intensification of current, low density developments. In any case, we are not aware of any solid evidence to suggest that a lack of industrial land capacity would demonstrate the 'exceptional circumstances' which might justify allowing de-designation of Green Belt land for this purpose.

No need for a Green Belt review

In view of the Inspectors proposals to reduce housing targets, the draft Plan's strong emphasis on the reuse of previously developed land, and our own evidence that there are large areas of underused developed land suitable for new housing, ***CPRE London is also opposed to the Panel Recommendation (PR) 35 that there should be a 'comprehensive review of the Green Belt in London as part of the next review of the London Plan.'*** Making such a commitment in the new London Plan is not justified and would be a serious mistake. It would tie the hands of a future Mayor, send the wrong signals to developers, and undermine policies aimed at making better use of existing developed land which are fundamental to the land use strategy on which your Plan is based.

A review of London's Green Belt is neither necessary nor desirable. Since the concept of a 'green girdle' around the capital was first considered by the Greater London Regional Planning Committee over 90 years ago, it is clear that the Metropolitan Green Belt has played a vital role in restricting urban sprawl, minimising traffic growth and safeguarding countryside close to where people live. In the face of unprecedented climate and nature emergencies, the role of Green Belt in managing urban growth will only become more important. And with the large areas of underused and previously developed land to be found in London, there is no justification for releasing land in the Green Belt for new housing. Research by CPRE shows that at least 9 out of 10 homes built on former Green Belt land were not 'affordable' even according to the current flawed Government definition.

While we are strongly opposed to the suggestion, if there is to be a review of London's Green Belt, the only logical approach would be to examine the Metropolitan Green Belt as a whole, including all the home counties which it covers, not just the 7% which lies within London's boundary. Moreover, such a review should be carried out on the basis of how to maximise the public benefit that the Green Belt provides, including by providing relatively easy access to the countryside and fresh air for millions of Londoners, rather than simply to find land for new development.

The importance of Metropolitan Open Land

We are also deeply disturbed at the dismissive approach taken by the Inspectors to your proposed policies to protect Metropolitan Open Land (MOL). This land has a critical role to play in providing access to green spaces for people across every inner London Borough. Despite being equivalent to Green Belt in planning terms, the evidence shows that MOL is under even greater pressure for development. This often reduces the contribution it can make to London's network of green spaces and the benefits it can provide local communities as a place for recreation and relaxation. That is why we strongly supported your Policy G3



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which not only seeks to ensure that the overall extent of MOL is not reduced but which also aims to improve its value for Londoners. ***We therefore strongly oppose Panel Recommendations (PRs) 37 and 38 and urge you to retain effective policies to protect, extend and improve MOL for the benefit, in particular, of communities in inner London who lack access to high quality green space.***

We are also opposed, in part, to Panel Recommendation (PR) 46 which suggests that MOL could be developed to accommodate development to 'maximise the multifunctional benefits of waterways'. While we welcome the proposed deletion of paragraph 9.14.8 of the draft Plan which states that 'the River Thames should not be designated as MOL', we believe it would fundamentally weaken MOL protections to specify in the Plan types of development that might be considered to justify 'exceptional circumstances'.

Summary

Overall, we believe your draft Plan contains a sensible set of policies to improve the efficiency of land use within the capital. Many of these were supported by CPRE London and other public interest groups at the examination earlier this year. We particularly support measures to tackle car-dependent development, promote healthy streets, and make much better use of land currently occupied by sprawling, low density development, including for much needed new housing. The Plan's proposed policies to protect and improve green infrastructure, including designated Green Belt, London's unique Metropolitan Open Land (MOL), and its urban parks and other green spaces, will be critical in building a more climate resilient and liveable city for future generations.

We need to safeguard and increase the health and environmental benefits of the Green Belt and MOL which provides access to the countryside and green spaces on the doorsteps of millions of city-dwellers. This is in line with [The Positive Vision for the Future of London's Green Belt](#) which has recently been published by the All Party Parliamentary Group. Any proposals which undermine the effectiveness of Green Belt and MOL policies in delivering these objectives and securing more sustainable patterns of development should be fiercely resisted. ***We therefore urge you to reject the Panel Recommendations as outlined above.***

If it is helpful, we would be pleased to discuss in more detail the evidence we have gathered which supports our position and the policies in your draft Plan. In view of the public interest in this issue, we will be making this letter available on our website.

Yours sincerely,

Neil Sinden
Director, CPRE London