



The countryside charity
London

London's Green Belt: our climate safety belt

Our Green Belt protects us from floods and high temperatures and is a place for nature, leisure and local food production. It promotes regeneration of rundown areas and the development of a compact, low-carbon city.



If we build on our Green Belt, we create a sprawling, high-carbon city with increased carbon emissions, traffic congestion and air pollution and we reduce our ability to manage extreme weather events.

... is under renewed threat

March 2020

London's Green Belt is our climate safety belt and much more. It can protect us from floods and high temperatures, and be a place for nature, leisure and local food production. It promotes regeneration of rundown areas and the development of a low-carbon city, with affordable homes being built in attractive urban developments on widely available brownfield sites. Our Green Belt contains country parks, cycle ways, community forests and important habitats for wildlife.

But it is currently under threat like never before. In Outer London and the surrounding counties more than 500 sites will be lost unless we take action. This will add to carbon emissions, increase traffic congestion and air pollution and reduce our ability to manage increasing numbers of extreme weather events.

There is no need to build on London's Green Belt. New homes can be built on widely available brownfield sites and by redeveloping sites which currently make poor use of space. There is enough previously developed land in London and in England to build for at least 20 years and, if we take intensification seriously, for much longer.

Building on London's Green Belt cannot solve the housing crisis. The crisis is not about land availability. In London and the South East, it is in large part about affordability. But Green Belt housing is typically expensive and out of the reach of people on a low income.

What we want to hear from the London Mayoral and Assembly 2020 election candidates

- 1.** London Mayoral and Assembly candidates should commit to doing all they can to protect Green Belt and to resist attempts by London Boroughs to remove its protected status.
- 2.** They must also commit to doing much more to support boroughs to be proactive in bringing forward brownfield and under-used sites for re-development.
- 3.** The new Mayor should work with the counties surrounding London to stop the building of car-dependent housing and promote development based around public transport, walking and cycling.

London Boroughs must also play their part. They should avoid seeking to allocate Green Belt to accommodate development. Instead, councils should work with landowners and developers to bring forward previously developed sites for re-development.

London's Green Belt: our climate safety belt and much more

Our Green Belt is, in effect, our 'climate safety belt'. It ensures we build a low-carbon compact city instead of a polluting, high-carbon, sprawling one. At its simplest, compact cities are lower carbon because people travel less by car and goods don't have to be moved so far. But with more extreme weather events, our Green Belt is also now vital in managing rainfall and flooding and reducing high temperatures generated by the urban heat island effect.

Despite this vital role, pressure to build on Green Belt remains as this report shows, especially for new housing. This is even though evidence shows most homes built in the Green Belt are not affordable; that there is plenty of brownfield land available; and that if you build in Green Belt, you are consigned to building low-density, high-carbon, car-dependent housing which will undermine efforts to tackle climate change, reduce traffic congestion and improve air quality in the city.

The Green Belt promotes high density, urban living which has both social and environmental benefits and is attractive to many. Planning development around public transport, walking and cycling, and car-share schemes instead of private car ownership, is not only possible but desirable, particularly to older people, young people and people

on lower incomes who do not want to or cannot afford a private car. Roughly a third of households in Outer London, and two thirds in Inner London, already do not have access to a car. For those who need a car occasionally, car-share and hire are realistic and cheaper alternatives to car ownership. High density development does not have to mean high rise, but it should be accompanied by appropriate services and amenities.

Green Belts ensure we rebuild and invest in areas which need regeneration and don't leave brownfield spaces derelict and wasted. In fact, this is one of the official purposes of Green Belts.

Our Green Belt also supports local food growing and is often high-grade agricultural land. It also provides important habitats for wildlife and space for recreation and relaxation for Londoners. We need to improve the public benefits that our Green Belt provides, including by increasing public access to it and investing in schemes to improve its environmental quality such as large scale tree planting in suitable locations and supporting nature-friendly farming.

Green Belts ensure we rebuild and invest in areas which need regeneration

Threats to Green Belt in London are increasing

CPRE London has campaigned for many years to save London's Green Belt, working with local campaign groups as well as CPRE branches around London and the London Green Belt Council. It is vital to maintain efforts to retain our Green Belt because it continues to be lost incrementally.

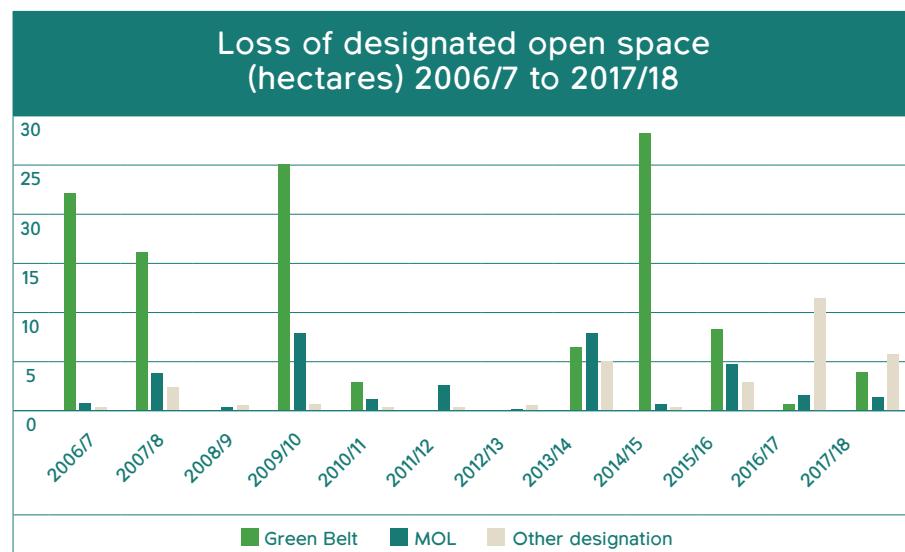


Figure 1. Loss of Green Belt, Metropolitan Open Land (MOL) and other Designated Open Space to development 2006/7 to 2017/18. Source: London Plan Annual Monitoring Reports

Of most concern in recent years has been threats arising during the preparation of Local Plans by London Boroughs. The Local Plan is a key planning document which the council draws up to guide its decisions on land use and development. It must reflect national policy and, in London, the Mayor's planning policies as set out in the London Plan which is currently being reviewed.

Usually prepared once every 10 to 15 years, London Boroughs are reviewing their Local Plans more frequently, largely to accommodate ever-growing targets for new housing.

Our research has shown that there are now 5 London Boroughs where there are major threats to Green Belt and 4 others where there is a significant risk that threats will arise in the near future. Between November 2019 and February 2020 we analysed Local Plan Review documents and made an assessment of the level of threat. On the opposite page we set out the level of threat arising from adopted and emerging Local Plans in each London Borough with Green Belt.

Our research has shown that there are now 5 London Boroughs where there are major threats to Green Belt

Current threat status - HIGH

Hounslow

Hounslow Council is No.1 in our threats list as they are seeking to allocate 125 hectares of Green Belt, an area the size of 200 football pitches, for development in the West of the Borough. By far and away the biggest current threat to Green Belt within the GLA boundary, Hounslow has shown little regard for Green Belt protection. Over 20 sites are under threat including a historic scheduled monument and many Sites of Importance for Nature Conservation.

Croydon

The council's pre-submission Local Plan consultation contains an option to build on Green Belt, one of three options given for where new housing could be located. But brownfield

land is clearly available and the council itself presents two other options to locate development on previously developed – brownfield – land. It is a major concern that this is presented as a 'choice' when national policy clear states that brownfield land should be developed first.

Enfield

The recent Local Plan Issues and Options consultation made clear that Enfield Council is considering allocating land at Crews Hill in Enfield's Green Belt for development. This is a serious concern for local campaigners who have pointed to huge amounts of brownfield land within the borough and the many areas in need of regeneration which would provide more sustainable locations for development.

Kingston upon Thames

40 protected sites, including 22 Green Belt sites, were listed in the Site Allocations as part of the borough's formal public consultation on the draft Plan. It is not yet clear whether the council supports any of these sites being allocated for development so Kingston currently remains in our high threat category.

Redbridge

The battle against development of two major sports sites in Redbridge was recently won by a sustained local campaign led by sports clubs at Oakfield Sports Ground. But the Planning Inspector allowed Redbridge to release some smaller sites during the Local Plan-making process and these are likely to be lost to development in due course.

Potential threat in near future

Bexley

The council states that increased housing targets may lead to consideration of sites being allocated in the Green Belt to meet housing need. When their Local Plan consultation is published during 2020, we will reassess the threat level

Bromley

The current development of the Housing Strategy by Bromley Council will include finding sites for higher housing targets than were used to develop the adopted Local Plan. There is significant concern locally that this might involve Green Belt, though nothing has been announced formally yet.

Waltham Forest

The council is updating its Green Belt review despite having completed one as recently as 2015. This is a significant concern as it is an indication that the council may be looking for Green Belt land to allocate for housing.

Richmond upon Thames

The decision announced in February 2020 to conduct a Green Belt review to "inform how we best accommodate growth and development needs of the borough and beyond" means Richmond Council is another one to watch.

Current threat status - LOW

Two Site Allocations in the recent **Barking and Dagenham** formal public consultation have Green Belt designation. These are relatively small and it is not clear yet whether they will be in the final Local Plan. **Havering** Council appears to have avoided allocating Green Belt for housing in the new Local Plan but a few small sites of previously developed land in the Green Belt might be redeveloped.

There is no known current threat to Green Belt in **Ealing** or **Harrow** though both have recently granted permission for development on protected Metropolitan Open Land – which has the same high level of protection as Green Belt – which is a concern in terms of their approach to protected land. There is no current threat to Green Belt in the **Hillingdon** Local Plan to our knowledge and no indication of

any significant threat in **Newham** or **Haringey**. No current threat has been identified in **Barnet** however the Local Plan review process has just begun and this will need to be monitored. In 2018 **Sutton** adopted its Local Plan with no major changes to Green Belt.

Heathrow and home counties – HIGH threat

Beyond the GLA border, in the home counties, CPRE branches and the London Green Belt Council have identified a staggering 500 sites in London's Green Belt threatened with development.¹ The vast majority of these developments will be car-dependent and dramatically

worsen traffic congestion and pollution at the exact time that London is working to radically reduce car trips in the city. New homes can and should be built on brownfield land within existing towns and cities, not in Green Belt.

Heathrow expansion plans are also a huge threat to London's Green Belt and a major environmental concern more generally.

¹www.londongreenbeltcouncil.org.uk

Plenty of brownfield land is available, so why is Green Belt under threat?

CPRE London has previously published reports to show there is plenty of space to build in London. The current Mayor's technical assessment is that London's development needs can be met without building on Green Belt. This is the basis of the new London Plan which currently awaits Government approval. We can use brownfield land and promote regeneration and 'intensification' – making better use of land which is currently used inefficiently.

But politicians are put under intense pressure by developers and landowners who stand to gain hugely if protected status is removed or if development is permitted on the land. Developers like to build in Green Belt locations because they make a good profit at the expense of our environment, without significantly adding to housing stock or providing much affordable housing. Speculators often buy Green Belt land in the hope that planning permission will mean it increases in value. Once they have bought it, it is in their interests to apply pressure for its release.

Reasons are constantly being put forward by developers, landowners and some local authorities to justify building on London's Green Belt. The argument is often made, for example, that 'we must build on Green Belt to solve the housing crisis' though this is far from the truth: homes built in the Green Belt are generally executive homes built at low density with the expectation that households will own at least one car and more likely two. They are generally not affordable.

Sometimes a local authority owns Green Belt land so it may have a financial interest in it being released. In the London Borough of Redbridge, for example, a long battle was fought to save Oakfield Sports Ground, a site owned by the borough who also attempted to remove its protected status during its recent Local Plan Review.

The planning system relies heavily on landowners and developers putting brownfield or previously developed sites forward for housing or mixed-used developments. Unless a council is proactive in working with local landowners and developers, it has little control over what is coming forward, so cannot necessarily guarantee the re-development of key sites which could help them meet their housing targets. Developers and landowners are not slow to put Green Belt sites forward for development, however, as they are profitable to develop.

It takes a proactive approach from a council to bring sites forward for development and they need capacity to manage that. For major developments, there is an element of negotiation with input from the council even in the early stages when a developer brings forward proposals. This requires appropriate resources and takes time neither of which may be available.

Doesn't the Government say it will protect Green Belt?

The Government says it wants to protect Green Belt but its planning and housing policies combine to undermine Green Belt protections. It also turns a blind eye when local authorities seek to release Green Belt. Worse, the Government's Planning Inspectors often refuse to give local authority planning documents the stamp of approval if they decide to protect Green Belt.

A good example is that, though the London Mayor wants to protect Green Belt, and has made a very strong case in the new London Plan to say that development needs can be met within previously developed urban areas, Planning Inspectors have said

Green Belt should be reviewed. The Government's response to this proposal will indicate how serious it will be about protecting London's Green Belt.

Proposals to review the Green Belt are deeply concerning not only because they directly undermine Green Belt policy, but also because they give rise to speculation and opportunism. Developers and speculators buy land in the hope they may obtain permission to build on it which will substantially increase its value. It is then in their interest to apply pressure to remove the protection.

What will loss of Green Belt mean for Londoners, particularly in Outer London?

Green Belt development is nearly always car-dependent and almost never genuinely affordable.

Fundamentally, the incremental destruction of Green Belt will mean we have a higher carbon city with more congestion and pollution. It won't mean we have significantly more housing nor will it make housing more affordable.

Londoners, particularly those in Outer London, need to appreciate the negative impact of Green Belt development including bringing many more car journeys to the area. They need to weigh this against the potential for improving lives by building attractive new 'car-free' neighbourhoods within the existing urban footprint of the borough, where people can live car-free and close to amenities. Those higher density developments can deliver affordable housing and homes near to amenities for older people or young

people, or those on low incomes who don't want to or can't use a car. Where necessary, exceptions can be made for people who use a car or van for work; and car-share schemes can be introduced as an alternative to private car ownership.

Outer London in particular is characterised by a great deal of low-density housing. Simply building more of this won't diversify the housing stock to meet varied needs, nor will it make best use of brownfield land.

We urge members of the public to contact their local councillors and respond to local consultations to express their concern about threats to Green Belt in their borough and promote more sustainable alternatives. CPRE London can offer help, contact office@cprelondon.org.uk

Cover photos: Country walk by Kat on Flickr, Wild rabbit by Martyn Fletcher on Flickr, Veg by Shaun Dunmall on Flickr, Traffic jam by Daniel R. Blume on Flickr

Written and researched by
Alice Roberts and Louis Smith-Lassey

March 2020

70 Cowcross Street London EC1M 6EJ
www.cprelondon.org.uk
office@cprelondon.org.uk
020 7253 0300

CPRE London is a registered charity.
Number 802622



The countryside charity
London