

The London Green Belt Council

President: Gareth Thomas MP



19 February 2018

Sadiq Khan
Mayor of London
GLA City Hall
London SE1 2AA

Dear Mr Khan,

London Green Belt Council Response to the Draft London Plan 2019-2041 Consultation

The London Green Belt Council (LGBC) welcomes the opportunity to comment on the draft London Plan 2018-2041, and specifically on the impact that the proposals will have on the London Metropolitan Green Belt.

The LGBC is an independent, non-party political coalition of 83 different community organisations, action groups and residents' associations from across the Metropolitan Green Belt area. These groups campaign locally to protect the London Green Belt and collectively they represent over 50,000 people. The LGBC meets four times a year and publishes regular updates on threats to the Green Belt. It also provides the secretariat for the All-Party Parliamentary Group for London's Green Belt.

The LGBC welcomes the broad thrust of the draft London Plan 2019-2041, particularly the strong commitment to protection of the Green Belt. We welcome the unequivocal statement that "The Plan aims to accommodate all of London's growth within its boundaries without intruding on its Green Belt or other protected open spaces", and the pledges to "protect London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces ... promote the creation of new green infrastructure and urban greening ... (and) work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt."

We are pleased that the Plan makes clear the actual goals of the Metropolitan Green Belt and acknowledges that: "Some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly [but] ... this is not an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and reducing the urban heat island effect. The mayor will work with boroughs and other partners to enhance access to the Green Belt

and to improve the quality of these areas.” This is a very important approach and one which the LGBC warmly welcomes. We are concerned that some land owners are deliberately allowing Green Belt land to become derelict in order to put pressure on local government to allow development.

We are also pleased to see the Plan’s commitment to create “places of higher density in appropriate locations to get more out of limited land, encouraging a mix of land uses, and co-locating different uses to provide communities with a wide range of services and amenities.” We also support the Plan’s stipulation that borough plans should protect allotments and encourage new space for community gardening within developments. The LGBC would like to see many more sites identified that could be used for food production, and promotion of innovative solutions for small-scale food growing.

We do, however, have some concerns, especially about the housing numbers set out in the Plan. We are concerned that the new annual housebuilding target of 65,000 new homes is 33% higher than the current target of 49,000 set out in the Further Alterations to the London Plan (FALP) in 2015. Whilst accepting that this is at the lower end of the range of housing targets considered we are unconvinced that even this target is achievable in view of the increasing gap between the number of planning permissions already granted and actual building starts.

There has been a massive increase in recent years in the amount of land on which developers have permission but the rate at which they have been building has not kept pace with the rate at which they have been acquiring sites. Nationally, the ‘landbank’ of the Top 10 Developers is estimated to be some three times larger than the annual build rate. So, is 65,000 homes a year achievable, and, if it is not, should not a more realistic figure be put forward?

Research by CPRE makes clear the scale of the problem. In 2016/17 there were 30,900 new builds in Greater London. An additional 1,800 homes were gained through conversions and 8,800 through changes of use (including 6,300 under permitted development rights). The total of just over 41,000 new dwellings is 8,000 short of the overall FALP target and therefore a long way short of the new London Plan target of 65,000 new homes a year, which will require housebuilding to be ramped up by 58%.

The draft Plan states that “affordable housing is central to allowing Londoners of all means and backgrounds to play their part in community life” and proposes a “strategic target of 50% of all new homes being genuinely affordable.” The LGBC applauds this goal but we are concerned that developers may use viability assessments to reduce the proportion of affordable housing provided once permission has been acquired. It is vitally important that the 50% target (with the lower threshold of 35% for smaller developments) is maintained consistently across London.

With these caveats, the London Green Belt Council is broadly supportive of the London Plan 2019-2041 and is pleased to see that so many of our long-advocated policies are reflected in proposals set out in the draft Plan.

The LGBC is working on a long-term strategic plan to protect the London Metropolitan Green Belt and to highlight and strengthen its importance as a resource for Londoners. We are looking at positive ways in which the Green Belt can provide fresh food for London, provide important climate change mitigation including flood prevention, provide better and greater recreation resource, and contribute to the improvement of health as described in the World Health Organisation report of 2017. We would appreciate an early meeting to discuss these initiatives in detail and to identify synergies in our respective long-term strategies.

Yours sincerely,

Richard Knox-Johnston
Chairman

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