



Examination in Public of the draft London Plan: Written submission by CPRE London (1142) to the EIP Panel, January 2019

GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT - GREEN BELT AND METROPOLITAN OPEN LAND (POLICIES G2 AND G3)

Matter 65: Would Policies G2 and G3 provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the policies and detailed criteria justified and necessary and would they provide an effective basis for development management?

1. CPRE London strongly supports Policy G2 concerning the protection and enhancement of London's Green Belt. As stated in our submission on Matters 11 concerning the overall spatial development strategy and Matter 19 concerning housing supply, we believe strict Green Belt controls are essential to the delivery of the core objectives of the draft London Plan. Clarity and simplicity are key strengths of national Green Belt policy as set out in the National Planning Policy Framework (NPPF) and we are pleased that the draft Plan retains and reinforces this clarity.

2. With one exception, we are also broadly in support of Policy G3 in the draft Plan concerning Metropolitan Open Land (MOL) which has an equivalent status in planning policy to Green Belt. MOL performs a vital role in many parts of inner London, and more widely, in safeguarding precious green space for the benefit of local communities. It is vital that the protection it affords from inappropriate development is upheld in the London Plan. We are concerned, however, that the provisions in the draft Plan to allow for alterations to the boundary of MOL and the possibility of 'land swaps' risk seriously undermining the fundamental purpose of this designation which is to protect and enhance the open environment.

In particular: a) Is Policy G2 on London's Green Belt consistent with national policy and, if not, is this justified?

3. We believe Policy G2 is consistent with national policy as set out in the NPPF which emphasises the permanence and openness of Green Belts. The proposed Policy G2B (as amended) that 'de-designation' of Green Belt will not be supported is consistent with national policy given the evidence put forward by the GLA, including through the Strategic Housing Land Availability Assessment (SHLAA), that the development or 'de-designation' of Green Belt is not necessary to deliver the housing requirements set out in the draft Plan. This should mean that housing requirements are unlikely to meet the 'exceptional circumstances' test that might justify Green Belt release.

4. Given the release of Green Belt land is currently being considered by a number of outer London Boroughs, if this Policy G2 is to be effective it is necessary for it to robustly

enforced. To achieve this we believe the following sentence should be added at the end of Policy G2 B: 'We will enforce a presumption against the loss of Green Belt.' This will require an increase in the capacity of the GLA to object strongly to any emerging proposals for Green Belt release contained in Local Plans and to challenge its justification. Unless Green Belt loss is strongly resisted, it will seriously undermine the Mayor's ability to realise his ambitions for protecting and extending green space, as well as the core strategy of the draft London Plan which is to focus new development on previously developed land.

5. We believe the Mayor should also do more to oppose damaging Local Plan and development proposals affecting the Metropolitan Green Belt outside of London. There is growing pressure for housing development in many surrounding local authoritiesⁱ which risks damaging the integrity and value of the Green Belt.

b) Is the 'swapping' of Metropolitan Open Land (MOL) referred to in paragraph 8.3.2 and allowed for by Policy G3 AC justified? Do the other detailed criteria provide sufficient clarity about inappropriate development and how any boundary alterations should proceed? Should parts of the River Thames be designated as MOL?

6. While we welcome recognition that MOL should be protected from inappropriate development, this policy is seriously undermined by Policy G3 C which refers to the possibility of alterations to MOL boundaries, and the provision to allow 'land swaps' in paragraph 8.3.2 of the draft Plan. We are aware that these provisions have been amended in the suggested minor alterations which allay our concerns to some extent, but not fully.

7. The protection and extension of MOL should be supported unequivocally in the London Plan to help realise the Mayor's ambition to increase green space. 'Land swaps' undermine this because:

- The unique location and qualities of MOL are irreplaceable.
- They undermine the 'essential characteristic' of permanence, as set out in paragraphs 79-92 of the National Planning Policy Framework (NPPF), which as stated in paragraph 8.3.2 of the draft Plan, applies to MOL as well as Green Belt.
- The principle of land swaps creates a loophole that will be exploited by developers and others in ways that reduce the contribution of MOL to quality of life in London.

8. The open nature and environmental qualities of MOL are constantly being eroded by damaging proposals for inappropriate development. Strong policies are required to halt such speculation and opportunism, rather than policies which suggest that it is acceptable to build on this land even if new MOL is created an unspecified distance away. Despite the welcome improvements contained in the minor suggested alterations we still believe that Policy G3C should be deleted along with the sentence in paragraph 8.3.2 referring to 'land swaps'. Policy G3B should also be amended to read: 'The extension of MOL designations should be supported and undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.'

CPRE London, January 2019

ⁱ <http://londongreenbeltcouncil.org.uk/wp-content/uploads/2019/01/Further-serious-loss-of-LGB.pdf>