The London Plan Examination in Public 2018-2019

Organisation: Levitt Bernstein
Date: 25 January 2019
Matter: M65

Green Belt and Metropolitan Open Land

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? In particular:

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

We are concerned with the lack of detail in the London Plan regarding Green Belt (GB) policy. The London plan defers to the NPPF with regard to the specific conditions under which development may occur within the GB and under which conditions GB boundaries may be redefined, however, whilst the NPPF states that GB boundaries may be amended under exceptional circumstances, the London Plan lacks any detail on this issue.

As an example, we believe exceptional circumstances could include the chronic shortage of housing within London and its wider region, coupled with those opportunities to support important growth corridors, opportunity areas and clusters through the targeted release of GB land for housing.

We are also concerned that paragraph 8.2.1 justifies the prevention of development within the GB on the basis that it ‘helps to drive the re-use and intensification of London’s previously developed brownfield land...’ Development on brownfield land can make a significant impact but cannot solve the housing shortage, especially as a longer term plan. Further, ‘brownfield’ as a term tells you nothing about the appropriateness of a site for residential development other than that it is land that has previously been developed. Large amounts of GB land are located closer to transport hubs, local centres and employment sites thereby potentially making this a more sustainable option in many instances. Our recent research work with the London School of Economics (LSE) was brought together into a report – ‘The London Cambridge Corridor’ – making more of Green Belt. The findings of the report clearly highlight the opportunities around existing brownfield and greenfield sites along already emerging corridors such as the London Stansted Cambridge Corridor (LSCC). The report also probes further into the need to bring back regional planning as a core focus for joint up thinking, which will benefit various local areas within the Wider South East.

Instead, we would advocate a suite of measures to address the problem that includes targeted housing development in strategic locations within the GB that support regional and national aspirations (e.g. growth along the London to Cambridge corridor) as well as brownfield development and the intensification of existing residential neighbourhoods within London. The London Plan therefore is far too London centric and doesn’t fully acknowledge the joint opportunities there might be if we were to consider a spatial plan that sets London within its wider region.

Additionally, we are concerned that the restrictive and inflexible wording of London Plan policy G2 conflicts with other aspirations detailed within the NPPF regarding the economy and those developments of regional and national significance. Paragraph 80 states:

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

The London to Cambridge corridor is one of the world’s most important clusters of knowledge and innovation and is a major driver within the UK’s economy. The release of GB land for housing could support the growth of
this regionally, nationally and internationally significant corridor however we feel this is inhibited by the wording of London Plan policy G2.

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?

We agree in principle with the idea that London Boroughs should be able to swap Metropolitan Open Land (MOL), in particular as there is such variability in the quality of land classified as MOL. However, we feel there needs to be greater detail regarding the conditions under which such a swap may occur. Most importantly, how would any local authority assess the value of existing MOL - based on its quality, location etc and therefore the appropriateness of existing MOL for swapping. There is also little detail regarding the conditions that would justify a land swap.