

‘Safe Under Us’?

The shrinking of London’s local countryside



“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.” – National Planning Policy Framework (first published March 2012, updated 2016 and 2018)

“We should not be imposing targets on councils that they are simply finding impossible to meet without building on the Green Belt, so we have to be much more sensitive in what we are doing.”
– Boris Johnson MP (25 June 2019)

FOREWORD

This has been the year of COVID-19. It is a year when almost everyone has grown to appreciate the value of the countryside, especially our Green Belt, for an opportunity to get out into the open and to enjoy the freedom and the scenery.

The importance of the London Metropolitan Green Belt (LMGB) has also been recognised as an important element in the climate change emergency. The significance to Londoners of the LMGB's countryside and open spaces cannot be overestimated. The Green Belt's capital value to London requires a long-term strategy for investment and enhancement to enable it to continue playing its vital role in carbon sequestration, flood prevention, clean air and absorption of heat generated in the urban areas.

In a recent survey of people living in the South East of England, almost 70% acknowledged the importance of getting out into the countryside and thought that green spaces should be protected and even enhanced. But at the same time the planning system has ensured that Green Belt land is increasingly sacrificed to development, mostly unsustainable, low-density housing, four or five bedroomed homes, with little or no affordable housing.

Much of London's Green Belt has already been lost at the margins of the urban areas, countryside which is readily accessible to those living in an urban community. This has resulted in longer travelling in order to be able to take advantage of this important resource. This is particularly detrimental to those who are suffering from mental illness and especially young families condemned to take ever longer trips to be able to enjoy the countryside.

This year the London Green Belt Council (LGBC) has noted even more interference from planning inspectors at examinations of Local Plans, forcing local authorities to allocate more Green Belt land for development. This in spite of the availability of brownfield (previously developed) sites, which inspectors appear to ignore. This could be considered abuse of their power and the LGBC believes that the Government should take action to ensure that London's Green Belt is properly protected.

This paper also highlights the lack of an overall strategy for London's Green Belt. There are some 66 different Local Planning Authorities (LPAs) in the LMGB and each has responsibility for their part of the Green Belt. There is little consistency or cooperation between LPAs as to how to protect and enhance the Green Belt. There should be an overall strategic authority for London's Green Belt in order to ensure that there is a long-term strategy for this important resource, vital both to London and the surrounding counties.

Richard Knox-Johnston

Chair

The London Green Belt Council

EXECUTIVE SUMMARY

- Currently there are plans to build 233,276 new houses on land within the LMGB.
- The number of houses planned has increased considerably.
- The number of LMGB sites earmarked for housing in Local Plans has risen by 211% since 2016.
- The number of houses planned for these sites has increased by 89%.
- The three counties with the greatest threats to their Green Belt land are Essex, Hertfordshire and Surrey.
- A contributing factor is that these counties are further ahead with their local plans and it is noted that the further they are in the process the greater the loss of Green Belt.
- Inspectors at Local Plan reviews are insisting on Green Belt Reviews and Green Belt loss in spite of Government policy.
- Politicians are keen to profess their keenness for the protection of London's Green Belt but have allowed Local Plan Inspectors to override their wishes.
- The value of the LMGB has increased considerably over the last year due to its importance for improving both mental and physical health especially during the Covid-19 pandemic.
- The importance of the LMGB has been recognised as a key positive contribution to the climate emergency by providing:
 - important carbon sequestration
 - flood protection
 - an important water resource for Londoners
 - assistance in absorbing heat from the city during high temperatures
 - recreation
 - local food with negligible carbon footprint
- The threats to London's Green Belt are numerous and widespread with 78% of the 66 Local Planning Authorities (LPAs) currently considering or proposing development on LMGB land.
- There is no overall land strategy for the LMGB, the 66 Local Plans are being examined and proceeding individually with a lack of consistency and coordination.

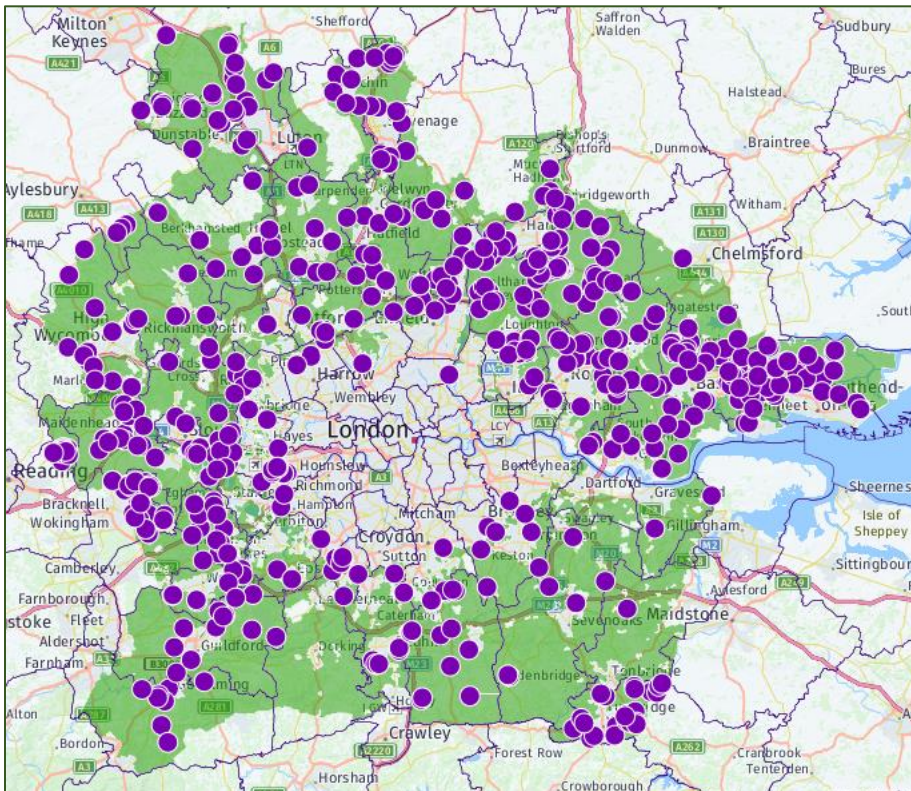
- There is currently no overall mechanism by which the cumulative impact of the threats is being considered resulting in the loss of land for food production, recreation, and important mental health benefits.
- There is no overall strategic body tasked with the responsibility for important land use planning, despite the Green Belt being an important cornerstone of the planning system.
- National planning policy appears to be ineffective in implementing controls on development in the Green Belt. The concept of “Exceptional Circumstances” is being interpreted by planning officers and inspectors in a somewhat cavalier fashion, resulting in further unnecessary loss of important Green Belt.
- In spite of Government ministers’ statements to the contrary, failing to meet housing targets is being used more frequently to justify loss of Green Belt land to development.
- Updates to the National Planning Policy Framework (NPPF) have failed to give the Green Belt the protection it needs if it not to be continuously eroded. A clearer definition of “Exceptional Circumstances” is urgently required.
- Development in the LMGB is not, contrary to assertions from those who would use Green Belt land for housing, providing affordable homes. There is little evidence that any affordable development in the LMGB is taking place.
- Development in the LMGB is mainly 4-5 bedroomed, premium-price, low-density housing, and is not providing homes for young people.
- Many of the sites proposed will not be on public transport routes and will therefore be unsustainable.
- Published data on brownfield (previously developed) land shows that there are sufficient brownfield sites within those district council areas with LMGB to deliver nearly 250,000 homes in the LMGB, enough to replace all the houses planned for Green Belt land.
- In each five-year planning cycle, the threat to London’s Green Belt will continue to increase unless Government policy acknowledges and addresses the problem.

Development Threats to the London Metropolitan Green Belt, 2016-2020

2016



2020



THE THREATS TO LONDON'S GREEN BELT

This is the fourth report from the London Green Belt Council (LGBC) which provides evidence that, despite Government ministers' assurances that the Green Belt is safe in their hands, in fact, more of it is being taken for housing development. This report shows that between 2016 and 2020 the amount of new housing proposed on land currently within the LMGB has risen every year. The LGBC has predicted this increase each year and we predict that there will be a further increase in 2020-21.

The housebuilding industry and various ideologically-motivated free-market think-tanks spuriously claim that allowing more building in the Green Belt will improve the affordability of new housing, especially for the younger generation. But, as this report shows, the reality is different. Far from delivering housing that meets local needs, there is little evidence of any affordable housing being built in the LMGB may be less than 10%. There is evidence from English Green Belts that nine out of ten new homes developed on Green Belt land are premium-priced market housing.

In our 2017 report the London Green Belt Council asked who was to blame for the continuing and growing loss of LMGB countryside. From further research it transpires that local councils continually complain that they are given no option but to include Green Belt sites in their plans due to high housebuilding targets and pressure from the Planning Inspectorate. This is in spite of there being considerable urban brownfield land available which should mean there is no requirement to take greenfield sites for housing, in the LMGB.

Whether or not a Local Plan is found 'sound' by Planning Inspectors appears to be something of a post code lottery. Some Inspectors are at pains to protect the LMGB while others not only pressure local authorities to include Green Belt in their plans for housing development but on occasions force neighbouring authorities to accept extra housing figures, so-called "unmet need", while aware that this can only be achieved by losing further Green Belt. This was the case in 2018-19 in the adjacent Surrey boroughs of Waverley and Guildford which were required by the inspector to meet "unmet need" from the neighbouring borough of Woking.

Despite policy promoting brownfield development in the National Planning Policy Framework, in reality Green Belt land is often sacrificed for housing in preference to brownfield land. There is reference in the NPPF to "Exceptional Circumstances" and some local authorities' planning officers are claiming that a lack of a five-year housing supply itself constitutes "Exceptional Circumstances". This is not exceptional for local authorities in the LMGB – it is the norm.

There appears to be no lessening of pressure on the LMGB for housing, in spite of its importance for farming, recreation, climate change mitigation, flood prevention, and a major role in health and wellbeing especially for those suffering from mental health symptoms, as described in the Government's report 'A Green Future'.

The London Green Belt Council calls on national and local government to protect the London Metropolitan Green Belt, a positive and important resource for those living in or around London, not only now but in the future.

KEY FINDINGS

This report is the fourth update to research originally undertaken by the London Green Belt Council in June 2016 (and published in September that year) entitled **‘Safe Under Us’? – An investigation into widespread threats from housebuilding in the London Metropolitan Green Belt (LMGB)**. It is issued alongside an updated Map of Threats to the LMGB, originally published in 2016, which identifies the locations of the major sites under threat, a brief background paper ‘Why is London’s Green Belt so important?’ (Appendix A) and an accompanying study, ‘A Positive Vision for London’s Green Belt’ (Appendix B).

The first update was published in September 2017. This showed that the pressure on the LMGB had grown at a rapid rate and that the threat had significantly increased since the original 2016 survey. This increase had been predicted in the 2016 report, despite HM Government statements that this prediction was ‘misleading’. The second update published in January 2019 showed that the increase continued.

The pressure on the LMGB has continued to grow each year, significantly increasing the threat identified in the original 2016 survey.

- The number of Green Belt sites we identified as being under threat from development has more than trebled in the last 4 years, from 203 in 2016 to 632 in 2020.
- The number of dwellings proposed on LMGB land increased from 123k in 2016 to 233k in 2020 (an 89% increase).
- The majority of threats were identified in Local Plans drawn up by borough and district councils, showing that there are clear plans to release these sites for housing.
- As in each of the previous years, the counties with the greatest number of Green Belt threats are Essex (72,133 dwellings), Hertfordshire (71,156 dwellings proposed for the Green Belt), and Surrey (33,144) – but with Essex having narrowly overtaken Hertfordshire to reach the ‘number one’ spot for the first time.
- The three LPAs with the greatest number of threats are Thurrock (26,185 dwellings), Central Beds (17,917 dwellings) and North Herts (c. 14,000).
- The evidence suggests that the number of threats will increase further as more Local Plans are progressed, for example in a number of Kent and Surrey districts and the London Boroughs where progress with Local Plans is generally still at an earlier stage.

The findings of this report reinforce the conclusions in our previous publications showing how theoretically protected LMGB land is coming under threat as a result of Government housing and planning policies. These policies undermine Green Belt protections, allowing the Government to shift responsibility onto LAs, giving financial incentives to those who meet inflated targets and penalties to those who do not. The latest research underlines how:

- The Local Plan process continues to undermine Green Belt protection. Overall, the threats contained within Local Plans have become more numerous and widespread as plans progress.
- The combined pressures of the Duty to Co-operate (an obligation to consult with a neighbouring authority), inflated housing targets and the listing of three actions that are required to be undertaken before it can be concluded that 'Exceptional Circumstances' exist (first set out in the 2018 revision to the NPPF) are weakening the strength of Green Belt protection leading to the likelihood of increased release of Green Belt Land for development and with no guarantee that housing will be genuinely affordable.

This report provides further evidence that action is needed to reverse the increasing erosion of the LMGB. It demonstrates that LMGB land released for housing does nothing to address the affordability crisis in the South East of England and sacrifices valued open space that provides a range of natural capital benefits vital to the health and wellbeing of its residents.

The recommendations in our previous reports on the erosion of the LMGB continue to be apposite and are increasingly relevant in view of the evidence in each of the four reports in this series:

1. A Strategic London Green Belt Authority should be established to take an overall view of the integrity of the LMGB, to protect the LMGB and to promote and facilitate its positive use and restoration. The Authority should also monitor the condition of the Green Belt and take action where the quality of the land has deteriorated.
2. National and local Government should follow through on the exceptional circumstances test in the revised National Planning Policy Framework, so that changes to Green Belt boundaries are truly exceptional. LPAs should clearly demonstrate that they are making the best use of suitable brownfield sites and under-utilised land first in line with this policy.
3. The Government should clarify in planning practice guidance that Green Belt boundaries should not be reviewed every time council plans are supposed to be reviewed, ensuring that the boundaries endure for at least the timeframe of a local plan
4. More widely, a brownfield first approach should be established in national planning policy that supports the rebalancing of the economy, assists in urban regeneration and ensures suitable brownfield sites and under-utilised land is used first.
5. The Government should develop clear guidance to enable LPAs to revisit and where necessary recalibrate housing targets to ensure they are supportable, realistic, and take account of the Green Belt. The Duty to Cooperate and statements of common ground should recognise that in some areas, housing need may not be met where Green Belt is shared across several LPAs.
6. The Government should acknowledge that major developments in the Green Belt are not providing and will not be able to provide genuinely affordable housing.
7. Government at both national and local level should take steps to promote an attractive Green Belt with better access to it for greater public benefit.

THREATS SUMMARY TABLE

Threats to the London Metropolitan Green Belt October 2020: Summary Table

County	District/Borough	Number of dwellings proposed on Green Belt land	Number of sites proposed on Green Belt land
Bedfordshire*	Central Beds	17,917	26
	Luton	0	0
Berkshire*	Bracknell Forest	4,685	27
	Windsor and Maidenhead	5,958	26
	Slough	159	22
	Wokingham	0	13
Buckinghamshire	Aylesbury Vale	800	1
	Chilterns/South Bucks	5,200	13
	Wycombe	1,100	8
Essex	Basildon	8,612	
	Brentwood	5,572	17
	Castle Point	4,675	14
	Chelmsford	0	0
	Epping	6,826	84
	Harlow	0	0
	Rochford	10,263	23
	Southend	10,000	1
	Thurrock	26,185	14
	Uttlesford	0	0
Hertfordshire	Broxbourne	733	4
	Dacorum	13,752	8
	East Herts	11,450	11
	Hertsmere	4,500	8

	North Herts	14,000	6
	St Albans	12,345	11
	Stevenage	1,350	2
	Three Rivers	4,800	Not known
	Watford	0	0
	Welwyn Hatfield	8,226	12
Kent*	Dartford	0	0
	Gravesham	Not known	Not known
	Maidstone	0	0
	Medway	225	1
	Sevenoaks	4,740	6
	Tonbridge and Malling	3,500	1
	Tunbridge Wells	7,514	23
London*	Barking & Dagenham	Not known	2
	Barnet	Not known	Not known
	Bexley	0	0
	Bromley	Not known	8
	Croydon	740	7
	Ealing	0	0
	Enfield	Not known	5
	Haringey	405	1
	Harrow	127	2
	Havering	Not known	13
	Hillingdon	670	9
	Hounslow	20	11
	Kingston upon Thames	0	0
	Newham	0	0
	Redbridge	3,074	4
	Richmond	0	1
	Sutton	9	2

	Waltham Forest	0	0
Surrey	Elmbridge	4,760	31
	Epsom and Ewell**	2,046	10
	Guildford	7,235	14
	Mole Valley	3,523	49
	Reigate and Banstead	1,010	9
	Runnymede	4,061	16
	Spelthorne	1,700	19
	Surrey Heath	1,500	1
	Tandridge	5,025	11
	Waverley	1,021	18
	Woking	1,263	7
All Local Planning Authorities		233,276	632

*No significant change in the numbers during 2020

**An estimate based on the possible housing capacity of Green Belt areas identified as 'poorly performing'

RESEARCH

CPRE branches covering Local Planning Authorities (LPAs) with land in the LMGB were contacted during summer 2020. Branches were asked to provide data for the relevant LPAs in their area on sites within the LMGB that are proposed for development within adopted or emerging Local Plans and sites which are the subject of planning applications.

The CPRE branches involved were Bedfordshire, Berkshire, Buckinghamshire, Essex, Hertfordshire, Kent, London and Surrey. The branches were asked to supply data (where known) on the proposed use of each of the sites (residential, employment, other), the number of dwellings proposed for each site, the hectarage of the site, latitude and longitude coordinates and the stage of Local Plan development.

The main data sources used were the emerging Local Plans at any stage of development:

- Regulation 18 consultation (Issues and Options stage)
- Call for Sites
- Preferred Options consultation
- Regulation 19 consultation (Pre-submission stage)
- Submission draft
- Main Modifications
- Adopted Local Plan

A site within the LMGB that is proposed in any of the above stages of Plan development is, by definition, being considered for development and in which case constitutes a threat to the LMGB. Sites considered for development in draft Local Plans will not necessarily be allocated in adopted Local Plans. In particular, at the Regulation 18 (Issues and Options) stage of Local Plan preparation, it is likely that more sites are proposed than will be eventually allocated.

In addition to sites proposed or allocated in Local Plans, a small number of planning applications were also included where these were known about in the local CPRE branch. However, the majority of sites are those proposed or allocated in Local Plans.

Data collection was complete by 31 October 2020.

Mapping

The data provided by CPRE branches was used to produce an interactive map showing the location of the threat and any information provided on the nature of that threat, in particular the number of dwellings proposed for development (if residential), the size of the site and the most recent stage of Local Plan progress. Geographical Information System (GIS) software was used to produce the map.

Analysis

The data on sites and number of dwellings proposed for development within the LMGB was aggregated by LPA and by county. These were compared with the same data for each year from 2016 and used to assess emerging trends.

It should be noted that data was not always available within Local Plans on the number of residential units proposed for a site in every instance, and therefore the number of dwellings proposed in the LMGB are underestimates.

In addition to the data collected by CPRE branches, we have made use of several other data sources to supplement our data to provide additional analysis and enhance the interpretation of the data. These additional sources were:

- Live tables on land use change statistics, Ministry of Housing, Communities and Local Government, May 2019¹;
- House price to workplace-based earnings ratio, Office for National Statistics, March 2019²;
- Data compiled by CPRE on available brownfield land by LPA for the latest annual report on 'The State of Brownfield' published October 2020³;
- Subnational Population Projections for England: 2016-based, ONS, May 2018⁴.

¹ <https://www.gov.uk/Government/statistical-data-sets/live-tables-on-land-use-change-statistics>

² <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

³ <https://www.cpre.org.uk/resources/housing-and-planning/planning/item/5086-state-of-brownfield-2019?highlight=WyJzdGF0ZSIlnN0YXRlJ3MiLCJvZiIsIldvZiIsIm9mJyIsImJyb3duZmllbGQiLCInYnJvd25maWVsZCciLCInYnJvd25maWVsZCIlnN0YXRlIG9mliwic3RhdGUgb2YgYnJvd2>

⁴ <https://www.ons.gov.uk/releases/subnationalpopulationprojectionsforengland2016basedprojections>

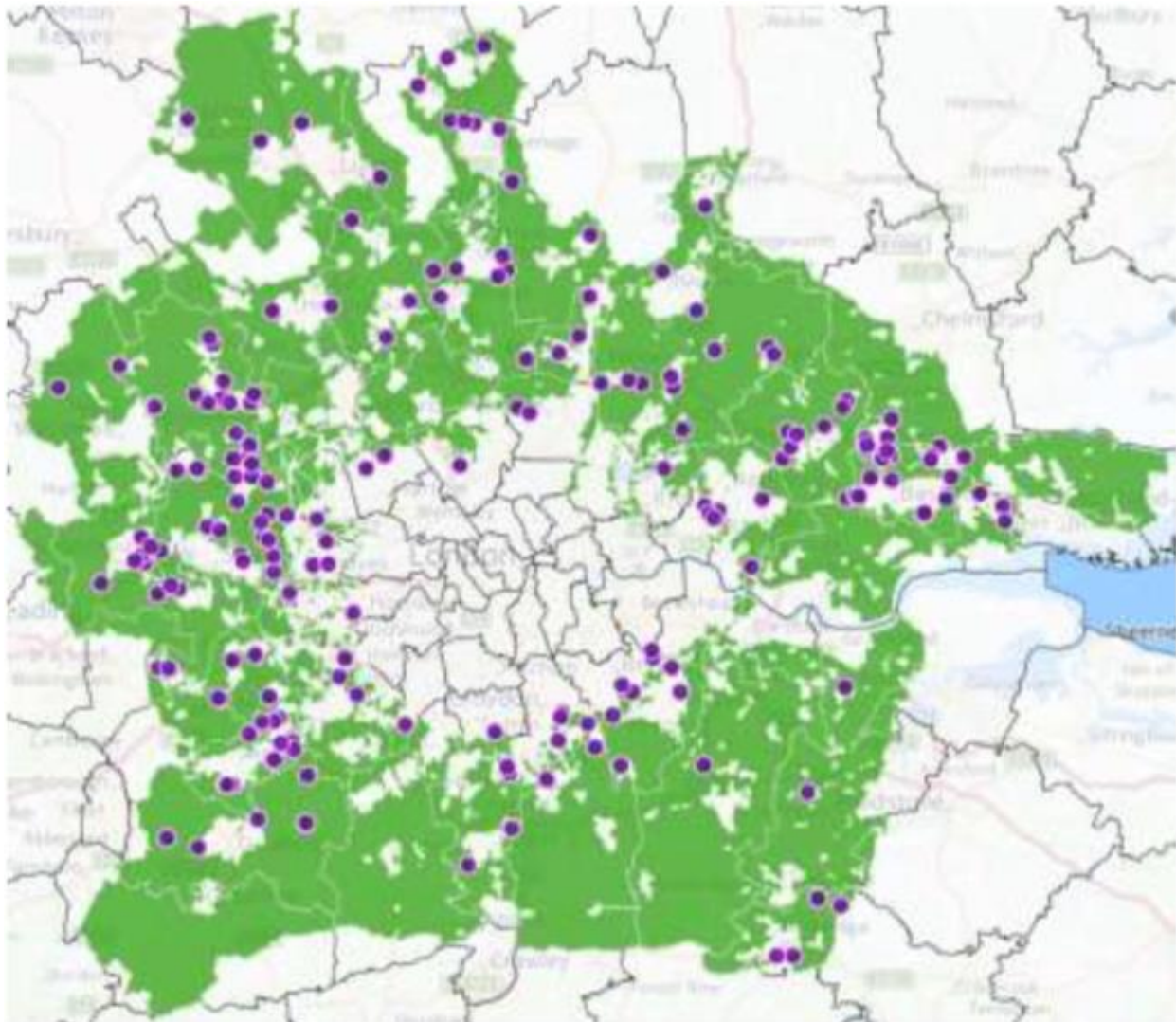
RESULTS

Updated Map of Sites Under Threat

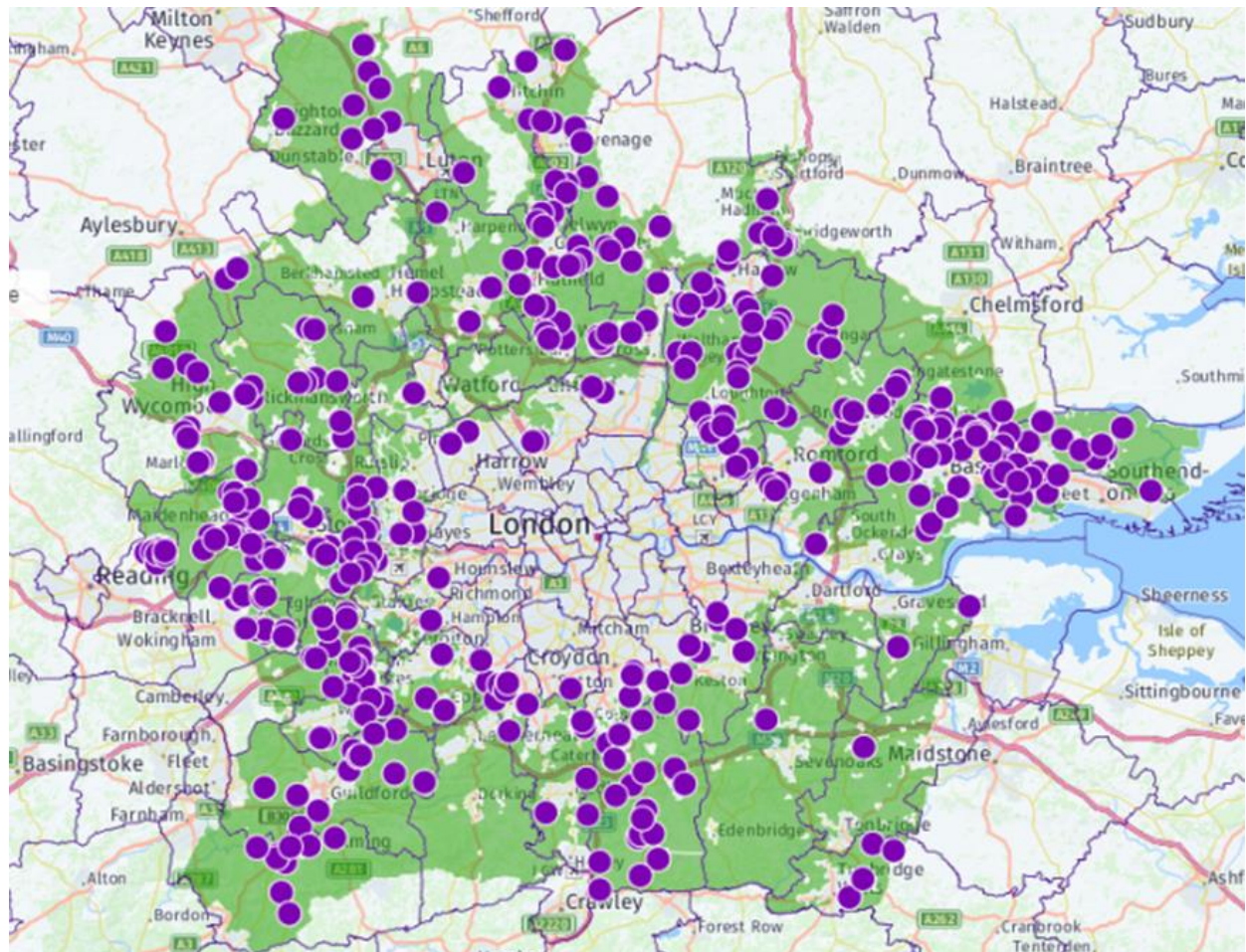
This report is published alongside an updated map of threats which can be viewed at <http://www.londongreenbeltcouncil.org.uk/>. Each dot on the map gives the location and leads to more details on the proposals for the site.

The following maps show the increasing number of sites threatened with development in the London Metropolitan Green Belt over the years 2016 to 2020.

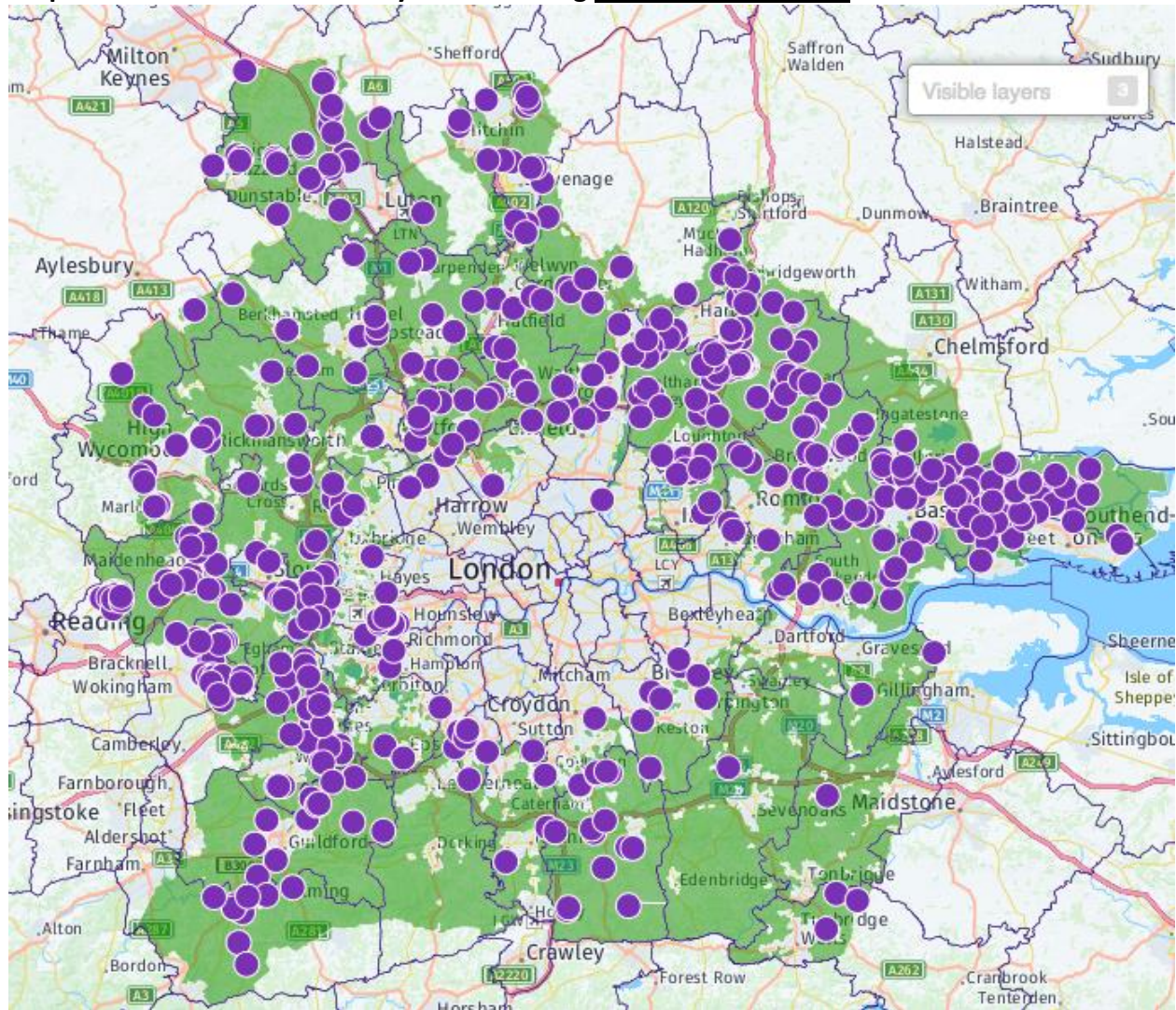
Map of threats to the LMGB July 2016 showing 203 threatened sites



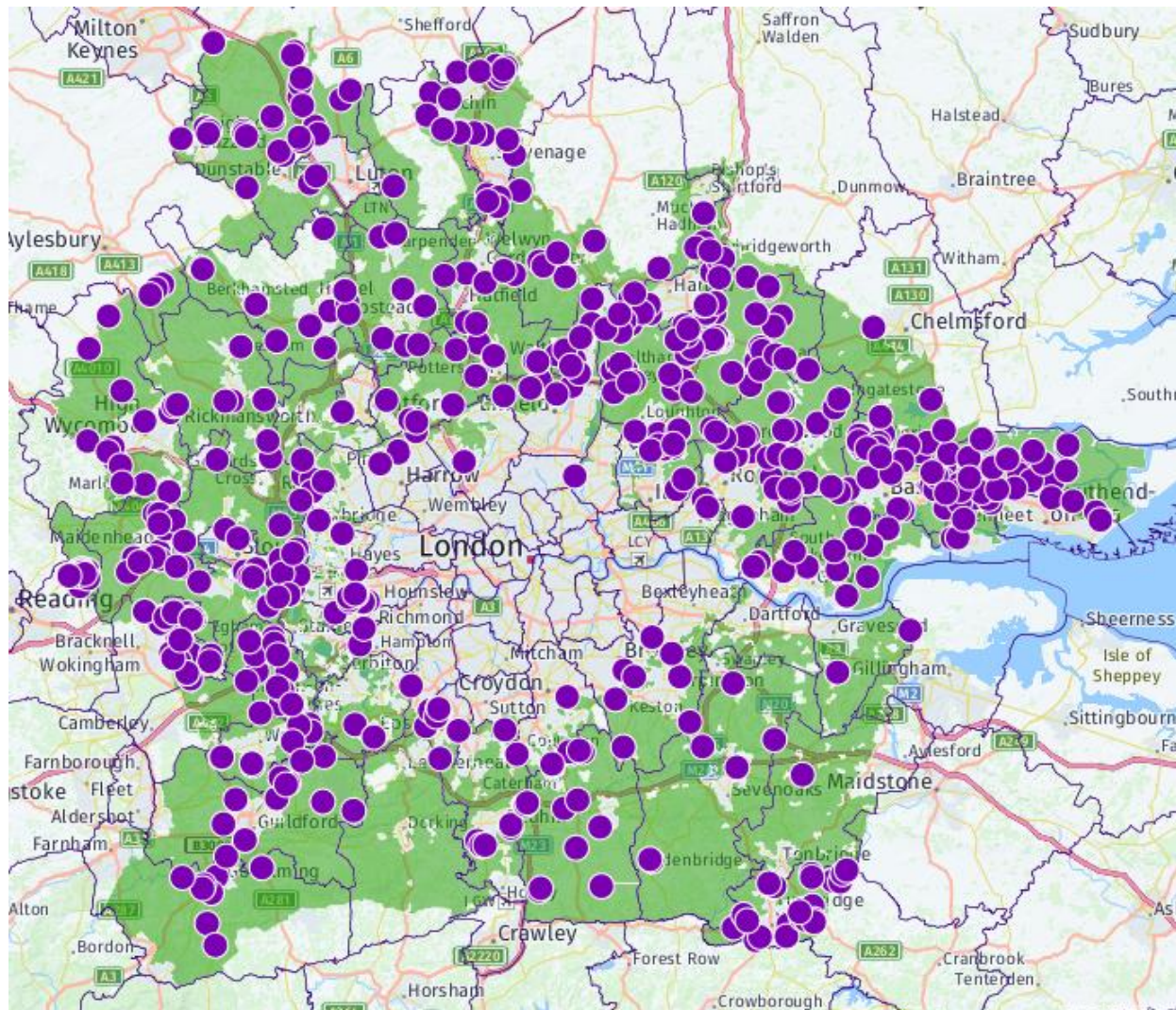
Map of threats to the LMGB July 2017 showing 443 threatened sites



Map of threats to the LMGB July 2018 showing 519 threatened sites



Map of threats to the LMGB October 2020 showing 632 threatened sites



The map shows that proposals to develop on LMGB land are widespread and extensive. 52 out of the 66 local authorities with London Green Belt in their boundaries plan to build on the Green Belt. No strategic overview or assessment is being taken of the cumulative impact of all these threats.

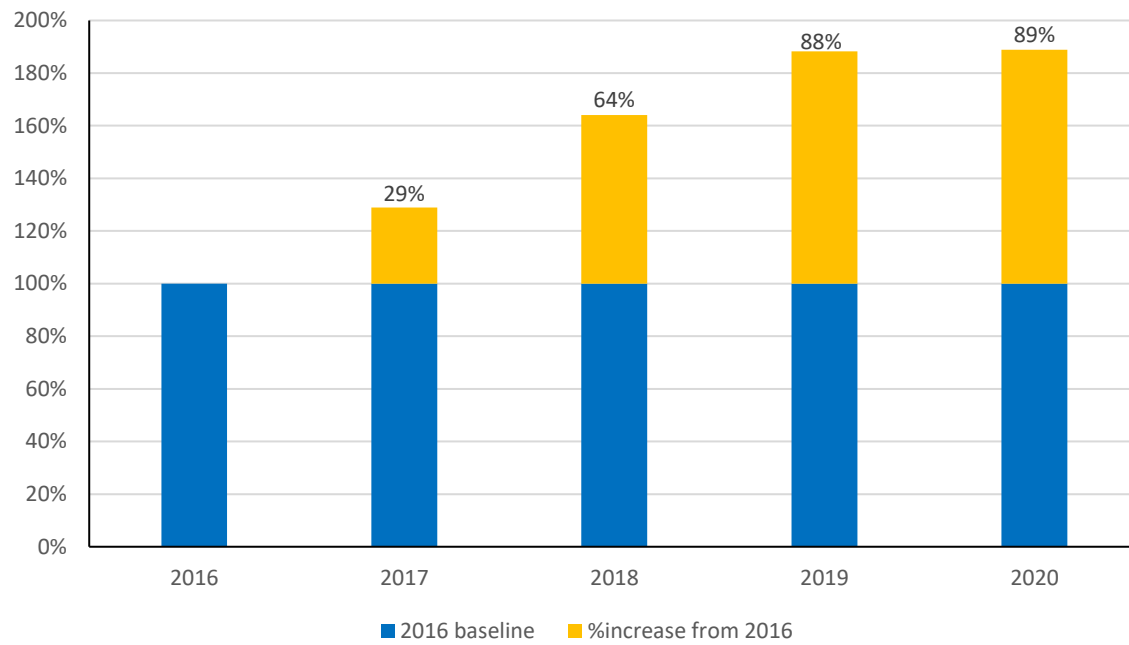
INCREASES IN THREATS – KEY FACTS

The number of dwellings under threat has almost doubled since our first survey four years ago and the number of sites has more than trebled (from 203 to 632). The table below presents the figures obtained from the research in each of the four years in which data has been gathered.

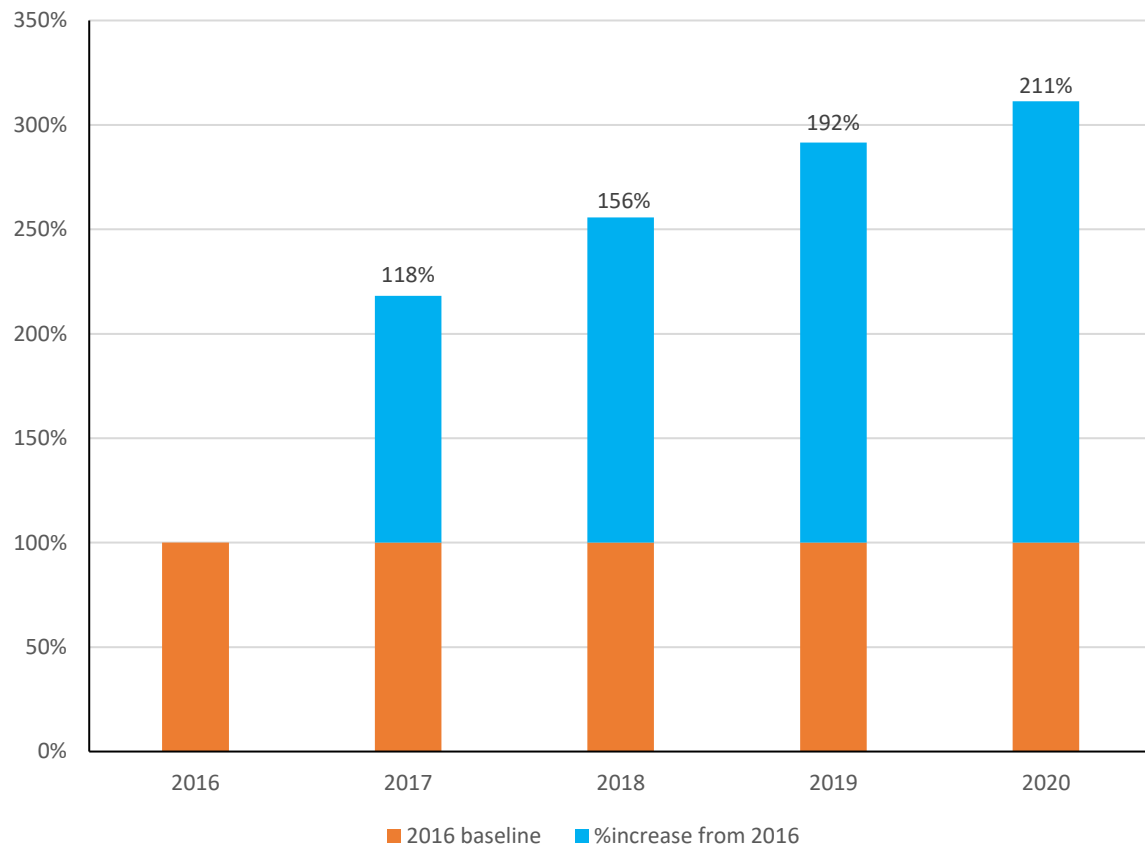
Number of dwellings and sites proposed for development in the LMGB, 2016 to 2020

	Number of dwellings	Increase from 2016 baseline	Number of sites	Increase from 2016 baseline
July 2016	123,528	N/A	203	N/A
July 2017	159,304	35,776 (29%)	443	240 (118%)
July 2018	202,715	79,187 (64%)	519	316 (156%)
July 2019	232,503	108,975 (88%)	592	389 (192%)
October 2020	233,276	109,748 (89%)	632	429 (211%)

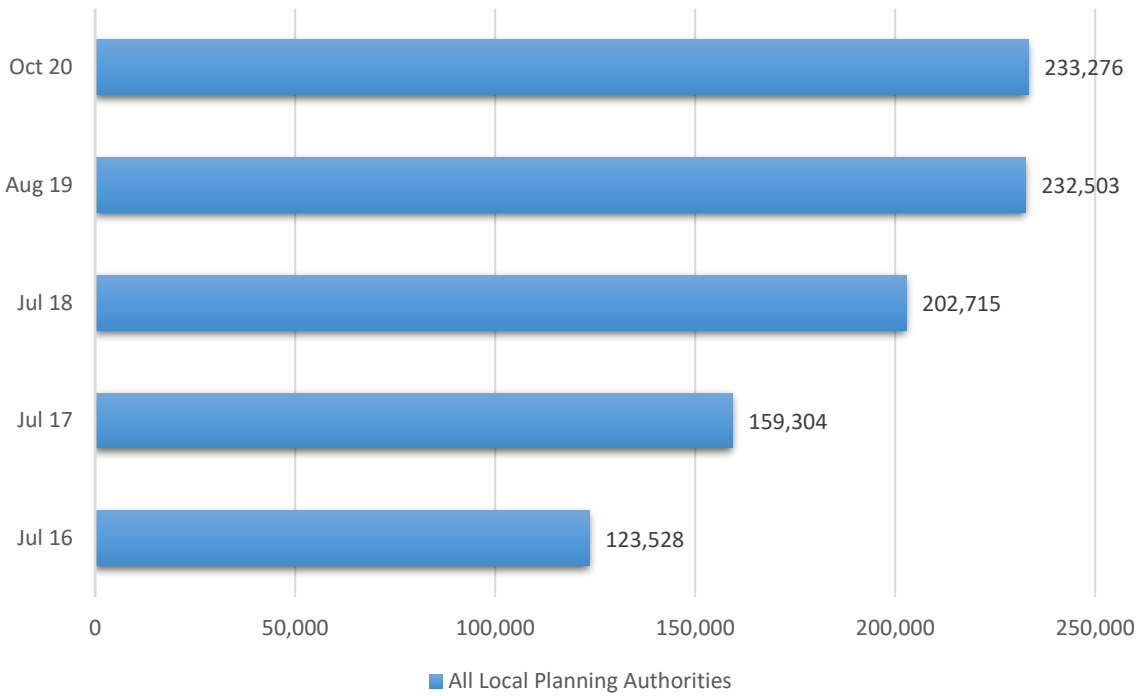
%age Increase of Dwellings Threats to LMGB 2016 - 2020



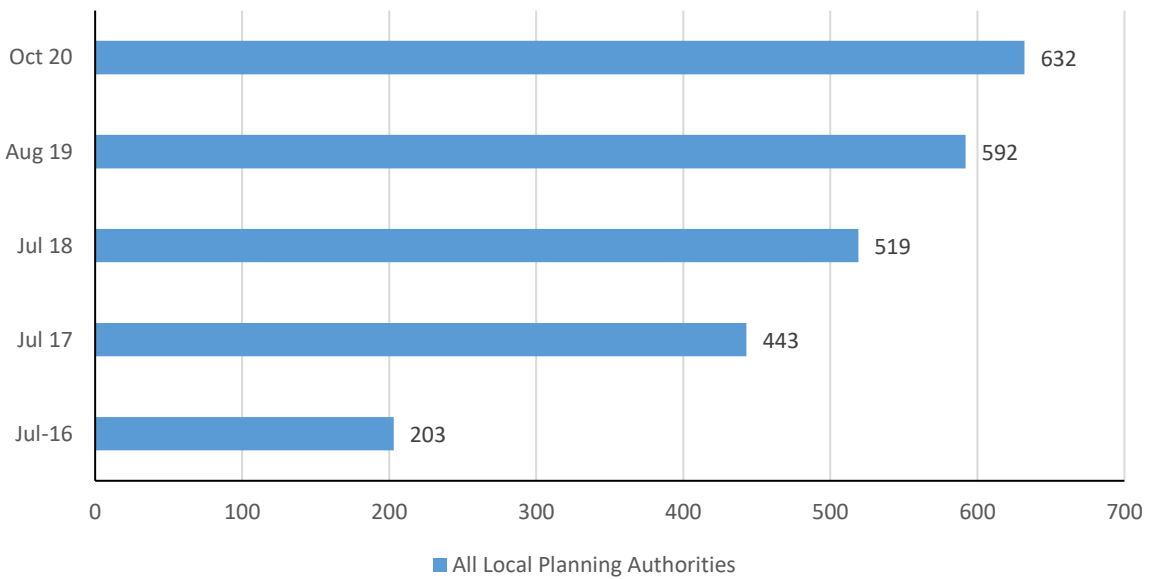
%age Increase of Sites Threats to LMGB 2016 - 2020



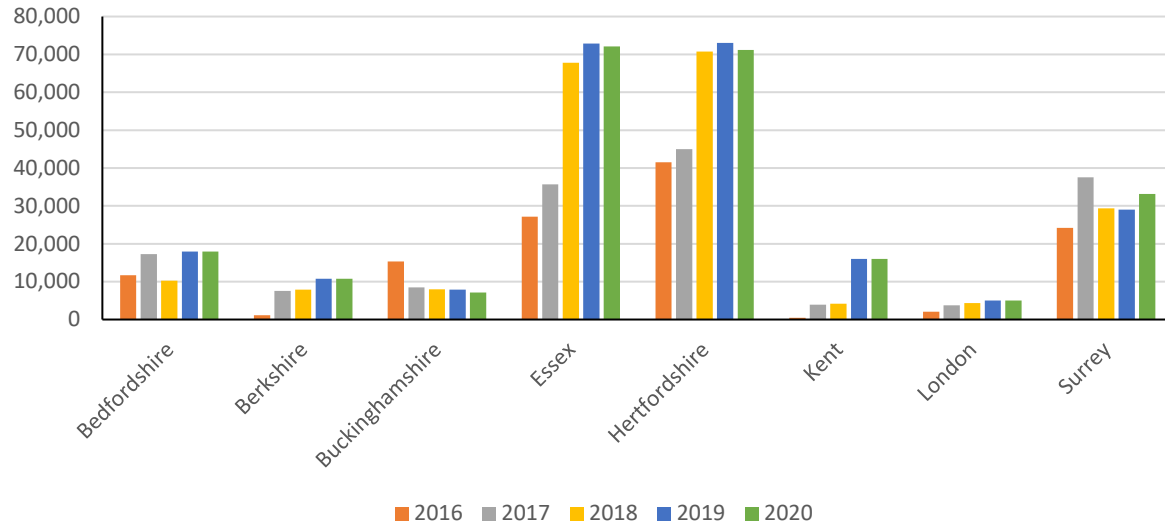
Total Number of Dwellings Threats to LMGB 2016 - 2020



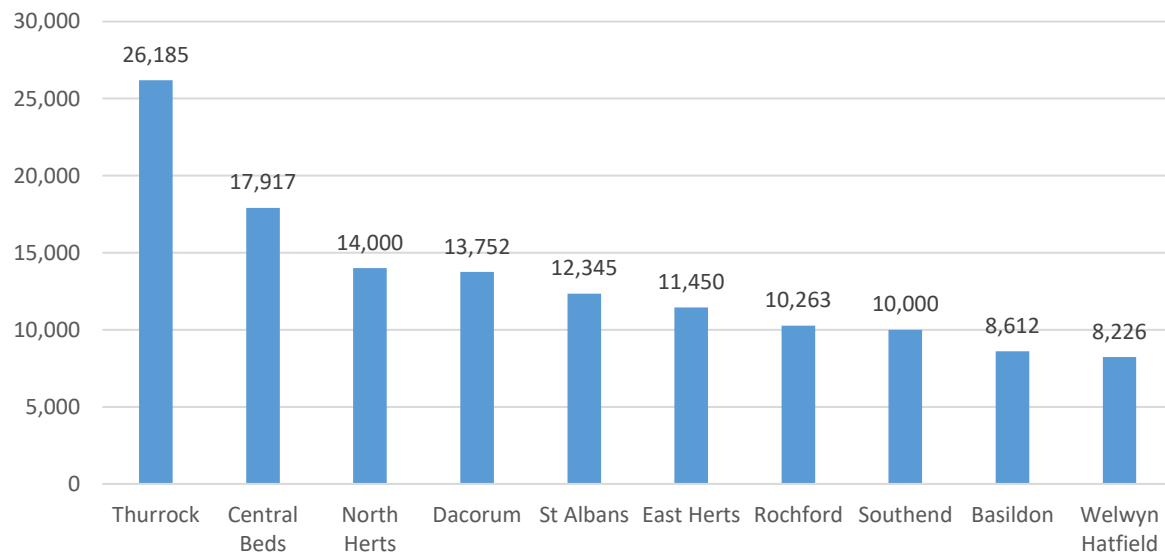
Total Number of Sites Threats to LMGB 2016 - 2020



Number of Dwellings Threats to LMGB by County 2016 - 2020



LPAs in the LMGB with largest number of threats 2020



The majority of the threats were identified in borough and district Local Plans showing that there are firm plans to release these sites for housing.

Threats by county

As in the three preceding years of our 'Safe Under Us?' reports, the three counties with the largest number of development threats in 2020 are Hertfordshire, Essex and Surrey, although the order has changed, with Essex overtaking Hertfordshire for the first time as the county facing the greatest loss of Green Belt countryside.

The jump in numbers in Essex are due mainly to significant increases in numbers of Green Belt dwellings being proposed in Southend, Rochford and Thurrock. In Hertfordshire, this is due to significant increases in Dacorum and St Albans.

The reason for the increase in Kent is that several LPAs in Kent were at an early stage of Plan preparation in 2018, but these are now progressing, with significant numbers of dwellings now being proposed on Green Belt land in Sevenoaks and Tunbridge Wells.

The slower increase in the number of threats in Surrey is due to a decrease in housing proposals in the Green Belt from 2017 to 2020 for 7 of the 11 local authorities, most notably in Woking (from 4954 to 1263) and Tandridge (from 8793 to 5025).

POLICY IMPLICATIONS

Green Belt development can no longer be considered exceptional

Of the 66 LPAs with LMGB land, only 12 are proposing **not** to allocate any land for development in their Green Belt (Chelmsford, Uttlesford, Luton, Harlow, Watford, Dartford, Maidstone, Bexley, Ealing, Kingston, Newham and Waltham Forest). These local authorities represent only 18% of all LPAs with LMGB land.

The figures for planned Green Belt loss throughout the whole LMGB region are a clear indication that the Government's policy aim to protect Green Belt land and *prevent urban sprawl by keeping land permanently open* is not working. The Green Belt is being eroded by land being taken through the Local Plan process in order to meet the so-called 'Objectively Assessed' need for new housing.

The new National Planning Policy Framework⁵ states that, before concluding Exceptional Circumstances exist to justify changes to Green Belt boundaries, the LPA must be able to show that it has examined fully all other reasonable options for meeting its identified need for development. These include making the best use of brownfield sites and under-utilised land, optimising the density of development, and engaging in discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.

Exceptional Circumstances will surely be said to exist in almost every LPA within the LMGB, given the Government's ambitious national housing target of 300,000 new homes per annum. It is a widespread challenge to find enough land to accommodate unrealistic housing targets. The 'Duty to Co-operate' with neighbouring authorities, all of whom are struggling with the same problem, is a poor substitute for strategic planning, as the pressure to release Green Belt land for development mounts.

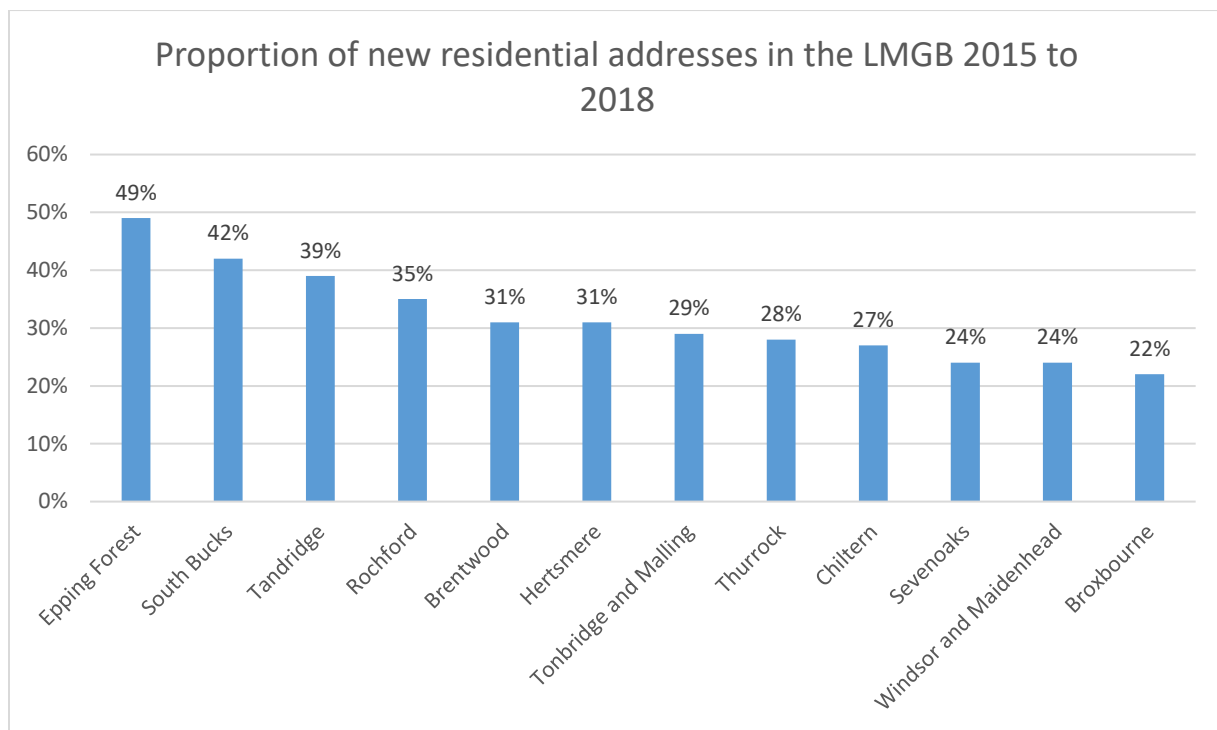
Green Belt development has not solved the housing affordability problem in the South East of England

Statistics released by the Government⁶ provide national data on the density of housing developments on Green Belt land and on other land. These statistics show that residential developments on Green Belt land are typically built at wastefully low housing densities. Nationally, the average density of developments built *outside* the Green Belt is 31 dwellings per hectare, while developments on Green Belt land have had an average density less than half of that, at only 14 dwellings per hectare. This is a clear demonstration that **Green Belt residential developments typically do not seek to provide high-density housing and do not represent an efficient use of land.**

Whilst well-located and small-scale rural exception sites in the Green Belt can provide homes that are affordable to local people, Government data gives clear evidence that large scale building on Green Belt land is not providing affordable housing. The next figure shows LPAs with LMGB land that have a high percentage of new housing built on the LMGB. These LPAs have permitted between 22% - 49% of new housing to be built on the Green Belt between 2015 and 2018.

⁵ National Planning Policy Framework, Ministry of Housing, Communities and Local Government, February 2019

⁶ Live tables on land use change statistics, Ministry of Housing, Communities and Local Government, May 2019

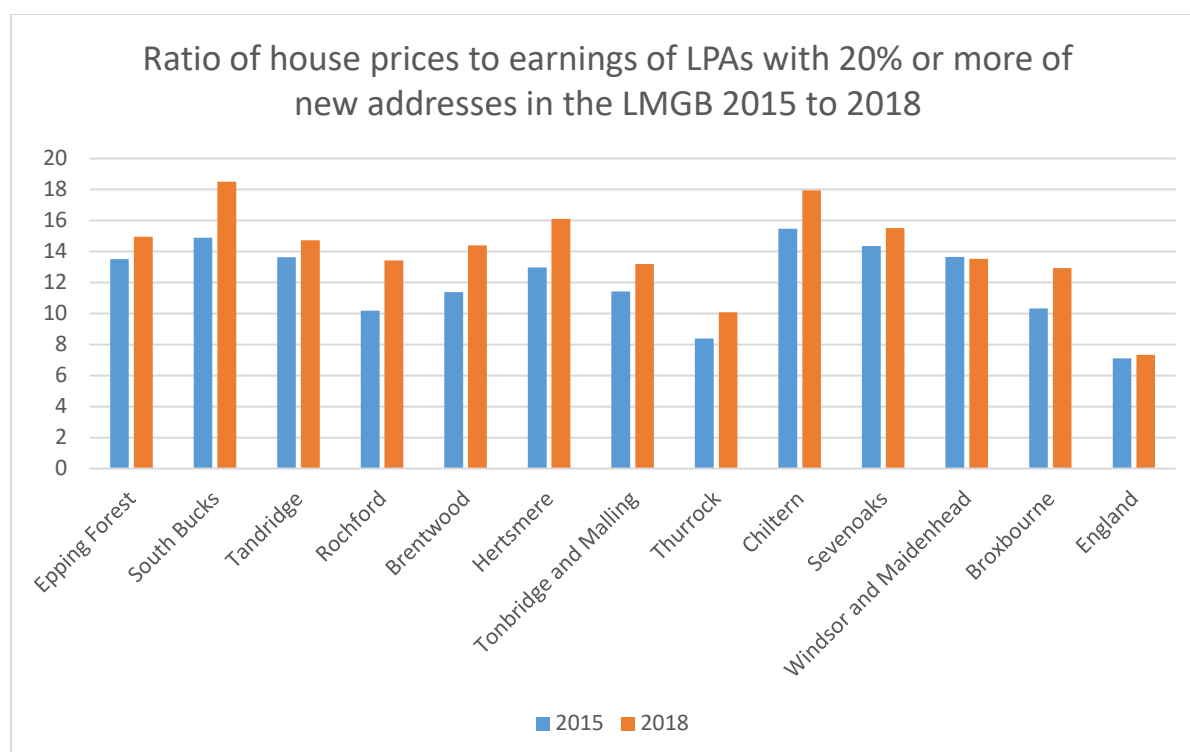


Source: Live tables on residential address change statistics, MHCLG, May 2019

The Office for National Statistics produces data on the affordability of housing⁷. The graph below shows the change in affordability⁸ from 2015 to 2018 for the 12 LPAs that permitted a high proportion of new housing on Green Belt land over the same period, and includes data for England as a whole for comparison. The higher the ratio of house prices to earnings, the less affordable the housing is. Clearly, in all of these LPAs sacrificing significant amounts of their Green Belt land for housing, the affordability battle is being lost spectacularly. In most cases, house prices have increased over the period and all are higher than the national average.

⁷ House price to workplace-based earnings ratio, Office for National Statistics, March 2019

⁸ The data uses the ratio of lower quartile house price to lower quartile gross annual (where available) workplace-based earnings.



Brownfield land is available

Research by CPRE for the report 'State of Brownfield 2020',⁹ published in October 2020, has revealed that there is a substantial amount of brownfield land available that could be used to accommodate housing development. Altogether, there are sufficient brownfield sites in England on which to build 1.3 million new homes, according to the CPRE research. This data was taken from published brownfield land registers that LPAs are required to compile, and probably therefore underestimates the actual scale of brownfield regeneration opportunities in this country.

In the 12 LPAs that have permitted 20% or more of new housing to be built on LMGB land between 2015 and 2018, there is a total of 740 hectares of brownfield land available. Using LPA estimates of the minimum number of dwellings that each site on the register could accommodate, this brownfield land could provide a minimum of 21,365 homes.

In all 66 LPAs with LMGB land, there is a total of 4,563 hectares of brownfield land available, which could accommodate a minimum of 246,644 new homes. Compare this with the 233,276 dwellings being proposed on LMGB land and it is clear that the inflexibility in the distribution of housing growth targets is driving development onto Green Belt land unnecessarily.

⁹ <https://www.cpre.org.uk/resources/state-of-brownfield-2020/>

The 2018 National Planning Policy Framework contained no provision for situations such as the current Covid-19 pandemic and resultant economic downturn. Such unforeseen situations will always affect the marketability of new houses and therefore reduce the rate at which developers would build. Coupled with the reported shortage of skilled construction workers,¹⁰ LPAs would be unable to achieve their housing targets and would be forced to provide more greenfield and Green Belt land for development.

FUTURE PROSPECTS

Population projections will drive more and more housing growth

According to data from the Office for National Statistics, the population of London is forecast to grow by 8.8% over the 10-year period to 2026 and the South East of England is forecast to grow by 6.4%. This is an additional 774,00 people in London and an addition 574,000 in the South East. On this basis, there is every reason to suppose that erosion of the LMGB will continue in the next decade unless the broken policy on Green Belt is fixed. In the next section we present our recommendations for how this can be achieved.

Ten-year population projections for London and the South East

	London	South East
Mid-2016 population	8,770,000	9,030,000
Mid-2026 population	9,543,000	9,605,000
Change over 10 years	774,000	574,000
Percentage increase	8.8%	6.4%

Source: Subnational Population Projections for England: 2016-based, ONS, May 2018

¹⁰ https://www.designingbuildings.co.uk/wiki/Tackling_the_construction_skills_shortage

RECOMMENDATIONS

The evidence set out in this report reinforces the recommendations in our 2017 update report and leads us to add to some further recommendations:

National Government should:

- **Create a strategic body with responsibility for assessing the integrity of the LMGB**, to protect, to promote and to facilitate its positive use and restoration. The Authority should also monitor the condition of the Green Belt and take enforcement action where its quality has deteriorated.
- **Ensure that the Exceptional Circumstances test in the revised NPPF is fully and rigorously implemented.**
- Clarify in planning practice guidance that **Green Belt boundaries should not be altered or revised each time a council's Local Plan is reviewed**, thus ensuring that the boundaries are secure for, as a minimum, the timeframe of the Local Plan.
- **Implement a clear brownfield first policy** to ensure suitable brownfield sites and under-utilised land is used before any Green Belt is sacrificed.
- Take a strategic approach that **redirects development away from protected areas, such as the LMGB, to those areas with more brownfield opportunities**, thereby assisting the rebalancing of the economy and assisting in urban regeneration.
- Develop clear guidance to enable LPAs to revisit and where necessary **recalibrate housing targets to ensure they are supportable, realistic, and take account of the LMGB**. This should acknowledge that in some areas, housing need may not be met where Green Belt is shared across more than one LPA.
- Create a long-term plan to promote forward looking strategies to **provide a more attractive and well-used LMGB which delivers greater public benefit.**
- Acknowledge that **building on the Green Belt is not the answer to the affordable housing crisis.**

Local Government should:

- **Clearly illustrate that best use is made of suitable brownfield sites** and under-utilised land *before considering use of Green Belt* as set out in Green Belt policy in the revised NPPF.
- **Proactively identify suitable brownfield sites** and other opportunities to redevelop and intensify previously-developed land.
- Consider ways to **enhance the quality of, and access to, the Green Belt.**

Note: Key Stages of Local Plan Development

These are set out in the Town and Country Planning (Local Planning-England) Regulations 2012

- Preparation (Regulation 18): Main consultation opportunity on the draft Local Plan, following which further amendments and adjustments may be made to take account of feedback received. It is important to publish key evidence studies and undertake constructive engagement during this stage and prior to this consultation in order to comply with the Duty to Co-operate.
- Publication (Regulation 19): Final opportunity for comment on the Local Plan prior to submission of the Local Plan for examination. No further changes may be made to this document after this stage. It is not a full public consultation and will not be accompanied by the full range of publicity and participation opportunities undertaken as part of the Regulation 18 consultation, but the 'general' and 'specific' consultation bodies must be notified of the availability of the documents. The Council must collect all responses and compile a Statement of Representations to submit to the Planning Inspectorate.
- Submission (Regulation 22): Dispatch of the required documents to the Planning Inspectorate for Examination. The Government has indicated that it wants all Local Planning Authorities to submit their Local Plans by 'early 2017'.
- Consideration of representations by the appointed person (Regulation 23) Before examining the Local Plan the Inspector must consider the comments ('representations') made on the plan by interested parties.
- Examination in Public (Regulation 24): Planning Inspector will consider the documents submitted and issue a report which states whether he or she considers the Local Plan to be 'sound'. The inspector can recommend 'main modifications' to the submitted plan.
- Receipt of the Inspector's Report (Regulation 25): If the Inspector recommends that the plan is 'sound', then the Council may proceed to adopt the plan as policy. Exceptionally, if the plan is not found sound, then the Council may withdraw it under Regulation 27.
- Adoption (Regulation 26): following receipt of the Inspector's final report, the Council may adopt the Local Plan as a material consideration in the consideration of planning applications under Section 23 of the Planning and Compulsory Purchase Act 2004.

'Safe Under Us'? The shrinking of London's local countryside

Editor: Andy Smith. Research, writing and analysis by Andy Smith, Hilary Livesey, Samantha Anastasi, Sarah Newman and Stuart Millson. Additional research undertaken by the Bedfordshire, Berkshire, Buckinghamshire, Hertfordshire, Kent, London and Surrey branches of CPRE the countryside charity.

APPENDIX A

Why is London's Green Belt so important?

From the Kentish North Downs – Keston Common to Downe (the rural home of Charles Darwin – and *still* rural, thanks to the Green Belt), to Westerham, West Malling and Sevenoaks – then along to the A25 and out to Surrey's Horsleys and Clandons, the countryside prevails. North-west of London, in what the conservationist-poet Sir John Betjeman enshrined as 'Metroland', parts of Middlesex, Hertfordshire and Buckinghamshire still preserve the atmosphere of a leafy outer-suburbia blending into rural England, with the tube line ending at Amersham – unable to stretch any further, defeated by fields and grass.

As the poet memorably remarked, to filmed scenes of a Tudor-style house with rose-garden-bordered swimming pool: "Oh happy life in Chorleywood"! Essex, too, so often thought of as an over-spilling extension of the city, confounds perceptions. Beyond the shadow of the towers of the Queen Elizabeth bridge on the Dartford crossing, the Green Belt slips into view: Epping Forest, for example, still suggesting a medieval England – the A12 and A13 from London reaching out to Ingatestone, Blackmore and Beggar Hill, and a host of Saxon-founded villages and hamlets.

The productive farmland which runs surprisingly close to the orbital motorway encircling the capital provides not just good views and a sense of relief from the pressures of the urban way of life that grips the further you go into the centre of the circle: it also provides a vast, ready-made wildlife retreat. At Forty Acres, near West Malling in Kent – just *outside* the current Green Belt boundary but which local communities seek to bring within the protective fold – hundreds of wintering redwings and fieldfares flock to the quiet fields.

For the people who live close by, and who can observe the bird migrations from the vantage point of lanes and any number of long-established pathways across the countryside, it is a living landscape that surrounds London and its environs. It is a place where the refreshment of living nature can be savoured: a place for rambling and riding, where the dog can be taken for a run, where you can jog, cycle, picnic with the family, and (if you are close to the hundreds of stables that exist across the Green Belt) ride a horse on quiet tracks.

In our age of anxiety, insecurity, fear of Covid-19, nervousness about lockdowns, so many of us are realising the importance of the Green Belt land we have for so long taken for granted. Here, we can walk and breathe, and unwind, escape from our masked existence in queues and among people avoiding each other on city streets, and find a release.

medical studies have confirmed just how much the nation (individuals, the NHS, Government) spends on treatments and medication for stress and depression, caused by our relentless, push-and-shove society – and yet, by the simple act of walking or running, or sitting and thinking – or general recreation each day in green spaces; by exposure to a green landscape and the soothing sights of Nature, individual wellbeing is put on an entirely different footing. And those same studies show that tens of millions of pounds – untold days of work, lost to industry through long-

term sickness, absenteeism and ill health – could be retrieved if only people lived a more natural, more straightforward life in a less congested setting.

Even urban-dwellers, perhaps unable, due to economic pressures or work commitments to venture very far from their homes can find enormous solace and personal wellbeing in what might be characterised as the ‘inner’ Green Belt closer to the city centre – the cleared canal paths and restored waterways of the capital, the pathways that lead out from the arterial road and bus routes, and on to marshland and disused former industrial sites, a home for wildlife and a surprising array of wild flowers. Kingfishers in Walthamstow; parks with a semblance of woodland; allotments and urban growing-spaces – urban farms, urban conservation areas: this is the value of conserved, preserved, undeveloped land to our complete wellbeing.

It may come as a surprise, that nearly a *quarter* of all Green Belt land is designated as an Area of Outstanding Natural Beauty (AONB) – with the further astonishing reckoning by statisticians that over 30,000 hectares contain Sites of Special Scientific Interest (SSSIs). Yet, detailed plans exist for a development assault upon our green spaces. In all, a staggering 233,276 new homes are *currently* planned for London’s Green Belt – a negation, not just of the much-vaunted idea of Localism but of the very essence of the Green Belt concept to which ministers claim they are so committed.

Communities across London and the Home Counties, consulted by their local councils as part of the Local Plan process, have overwhelmingly opposed the loss of Green Belt land for housing – but the tidal wave of opposition seems to have barely registered with council leaders or Government planning inspectors who have contented themselves that ‘Exceptional Circumstances’ exist for removing large swathes of countryside from the Green Belt, and that the local housebuilding targets set as a consequence of the UK Government’s desire for ‘housing-led’ economic growth justify any invasion of Green Belt countryside.

With its 6,214 miles of pathways, and its abundant, commercially-important farmland (so necessary now for food security), the LMGB is one of our most important natural resources. Not a building site, not an open book for developers, not a relic of a redundant 1950s past – instead, the Green Belt is a *gold standard* for life – a better, healthier life – for Nature and for a resurgence of all the ideals and values we have rediscovered in the age of coronavirus and climate change.

APPENDIX B

A Positive Vision for the London Metropolitan Green Belt *(First published in October 2019 by the All-Party Parliamentary Group for London's Green Belt, the London Green Belt Council and CPRE The Countryside Charity)*

Executive summary

Green Belts were first established over 60 years ago for the wellbeing of people and protection of the countryside. The essential characteristics of Green Belts are their openness and their permanence.

However, there are widespread inconsistencies amongst the public and policy-makers in their understanding of what Green Belt is, what it is for and what it can be. The conflict between development and Green Belt openness has been a constant theme throughout the history of the policy. However, current housing need is such that the Green Belt is potentially more vulnerable to erosion and mismanagement today than that at any other time.

Research has shown that there are plans for in excess of 200,000 houses in the London Metropolitan Green Belt (LMGB). However, there is little evidence that any of these houses will be for young people and young families as affordable homes are unlikely to be built. The evidence is that low density four and five bedroomed houses are the choice of developers.

The LMGB is by far the largest of all England's Green Belts and provides a wide range of benefits to all sections of society, not least for the benefit of London and Londoners:

- The LMGB has a positive and key role in preventing climate breakdown, for example through carbon sequestration in mature woodland and soils, restoration of ecosystems on agricultural and other land and reduction of food miles. It also helps us adapt to a changing climate by cooling our towns and cities and absorbing rainwater to reducing the impact of flooding.
- Although land is not designated Green Belt because of its landscape quality, the LMGB nevertheless contains landscapes which are highly valued. Nearly a quarter of the LMGB is designated as being of outstanding natural beauty. The closeness of these beautiful landscapes contrasts sharply with some other world cities which have no such resource on their doorstep.
- The LMGB is in rude health in landscape quality, natural capital, public recreational and access value. There are misconceptions about the quality of the LMGB but its purpose is to be open and proper investment in its landscape could improve its scenic value.
- The importance of trees has been highlighted by the climate change debate. The LMGB has a positive role to play in providing the land required as set out in the Government's 25-year Environmental Plan. There is already increased tree planting in the LMGB which is contributing to the landscape and providing a potential economic benefit as well as carbon sequestration.
- By preserving open spaces, the LMGB provides a much-needed habitat for species other than ourselves and is a refuge from the pressures of human development. Over 26,000 hectares of land within the LMGB are designated as SSSIs, nearly 2000 hectares are within National Nature Reserves and over 5000 hectares are designated as

Local Nature Reserves. By providing improved ecology and better networks will assist in providing a broader variety of species.

- The LMGB contains important recreational land, a resource available to all within the metropolitan area and beyond. It has over 10,000km of Public Rights of Way for enjoyment by walkers, cyclists and horse riders. Woodland cover stands at nearly a fifth of the LMGB area and although not all woodland is publicly accessible, it nevertheless represents an important resource for recreation and relaxation.
- Although there is considerable access and use of the LMGB it is not clear that it is inclusive of those who are disadvantaged or from an ethnic background. There needs to be action taken to ensure that everyone knows of the benefits of the countryside and how to access them, including advice on transport. There also is a need to encourage landowners to open private land for access supported by investment from Government.
- Being able to spend time being active or relaxing in a natural setting has been shown by numerous studies to be beneficial to health and wellbeing, helping to reduce stress and anxiety and contribute to physical fitness. There is also evidence that giving children access to the countryside can result in the build-up of the immune system to allergies.
- The evidence suggests that living in an urban area can lead to ill health from pollution, heat exhaustion and increasingly stress and mental illness. The cost to the NHS is considerable and appears to be increasing, whereas access to the Green Belt can be more beneficial and less costly, saving the NHS a not insignificant sum. The large and growing population of London has a pressing need for green spaces in which to relax, play and recuperate.
- The LMGB already provides high quality, traceable and fresh food grown locally to London. There is opportunity for more food production in the Green Belt, and we know that increasing numbers of consumers want to buy locally produced food.
- Many farmers are being constrained in forward planning because the threat of development. The uncertain situation caused by Local Planning Authorities producing local plans that take Green Belt farming land, causes uncertainty.
- Farms in the LMGB often have diversified into having a farm shop or contributing to increasingly popular farmers' markets. This encourages visits to the LMGB. Additionally, they provide opportunities for families to visit working farms which contributes to the education of children about farming and how food is produced.
- This report is recommending that an Advisory Council be set up to complete a review of the LMGB and create a 25-year strategy for its future following the objectives of the Government's 25-year Environment Plan.
- The Advisory Council would also develop a clear and positive vision for the future of the LMGB. Funding would be needed on the same model as a National or Regional Park, a Community Forest or a Local Nature Partnership to improve those areas needing landscape improvement, improved biodiversity and carbon sequestration. This would enable the LMGB to be a tourist attraction bringing in more investment.
- There would also need to be investment in farming in order to ensure that there was increased food production of fresh produce close to London, so saving carbon miles. Funding would also be required in order to incentivise

landowners to encourage access to Green Belt land with important education and play opportunities, especially for those from ethnic and deprived backgrounds.

1. Introduction

- 1.1. London's Green Belt is, and has been, a major asset and has greater significance and importance than it has ever had. The need for green space close to urban settlements has much increased as a result of climate change and the importance, being realised, of health and wellbeing.
- 1.2. The London Metropolitan Green Belt (LMGB) was first proposed in 1935 and was established 20 years later. In 1955, Housing Minister Duncan Sandys issued a Circular which urged all urban councils to engage in the designation of Green Belts "for the wellbeing of our people and for the preservation of the countryside". At 514,395 hectares, the LMGB is the largest of England's 14 Green Belts and has 32.2% of the total area of all Green Belt land in England.
- 1.3. The vast majority (92%) of the LMGB is undeveloped land, although only 58% of the land is registered as being in agricultural use while 16% is woodland¹¹. Of the remainder, much is used for 'semi-urban' uses relying on open land for recreation, such as golf courses, horse training and paddocks and also extensive attractive gardens.
- 1.4. The National Planning Policy Framework (NPPF) defines the fundamental aim of Green Belt policy as being to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence. The main reasons for the creation of the London Metropolitan Green Belt, to prevent the outward sprawl of London and encroachment into the countryside, are more important today than ever¹² because of increasing development pressures.
- 1.5. Green Belts are acknowledged internationally as an excellent demonstration of best practice in land use planning. They have prevented many towns and cities from sprawling across open countryside and has kept land on the edge of settlements permanently open and available for agriculture, forestry, recreation and educational purposes. However, there are widespread inconsistencies amongst the public and policy-makers in their understanding of what Green Belt is, what it is for and what it can be.
- 1.6. The Green Belt has become a controversial topic, generating contradictions and disagreements on planning for housing development and perceived or real threats to its permanent 'openness'. The conflict between development and Green Belt openness has been a constant theme throughout the history of the policy. However, current housing need is such that the London Green Belt is more vulnerable to threat today than that at any other time.¹³ Green Belt is often wrongly cited as the cause of the housing crisis and its removal as being a silver bullet to solve it.
- 1.7. National planning policy¹⁴ defines five purposes of the Green Belt:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

¹¹ Green Belts: A Greener Future, CPRE and Natural England, 2010

¹² Merrick Denton-Thompson, APPG oral evidence session, 4 June 2019

¹³ Green Belt Policy: Landscape Briefing, Landscape Institute, April 2018

¹⁴ National Planning Policy Framework: para 134, Ministry of Housing, Communities and Local Government, June 2019

- 1.8. The LMGB performs all of these important purposes through the provision of **natural capital**. Natural capital describes the economic benefits to people provided by the services the environment provides for free. It is the aim of the Government's 25 Year Environmental Plan¹⁵ to set gold standards in the use of natural capital in decision-making. The natural capital within Green Belt land performs a range of important environmental functions which are of material benefit to people and settlements. These include functions such as:
- water absorption, helping to alleviate flooding and reduce stormwater runoff;
 - cooling, helping urban areas to adapt to the effects of temperature rise caused by climate change;
 - improvement of air quality, absorbing pollutants and providing respite from poor and deteriorating air quality in London and larger towns;
 - high quality landscapes close to the capital;
 - green spaces for access and recreation and a home for other species;
 - land to grow food and other crops.
- 1.9. Each of these aspects of the value of the LMGB are explored in more detail in this paper. There is a pressing need to secure multi-functional outcomes from land, especially from land close to urban areas, to meet the Government's policy on health and wellbeing. We need a wider understanding of the value, function and long-term management of Green Belt land across the UK.¹⁶

2. Pressures on London's Green Belt

- 2.1. The LMGB is under greater pressure than any of England's Green Belts. These threats include proposals for new development, both in terms of infrastructure, such as airports and transmission lines and, in particular, new housing.¹⁷
- 2.2. The Government attaches great importance to Green Belts. National planning policy states that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. A local planning authority (LPA) should regard the construction of new buildings as inappropriate in the Green Belt, with some specific exceptions. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations.
- 2.3. A major piece of research and mapping by the London Green Belt Council (LGBC), published in 2016 in the report *Safe Under Us?*, provided overwhelming evidence that the LMGB was under greater threat than ever before. The research drew on local evidence provided by members of the LGBC as well as CPRE branches in Bedfordshire, Berkshire, Buckinghamshire, Essex, Hertfordshire, Kent, Surrey and London.
- 2.4. Since this first report, annual updates have been commissioned by the LGBC. The latest report¹⁸ shows that development pressure on the LMGB has grown at a rapid rate, with a significant increase in the pressures for development within the LMGB in just two years.
- 2.5. Key findings were as follows:
- The number of LMGB sites identified as being under threat from development more than doubled between July 2016 and July 2019, from 203 to 519. The total number of houses proposed on these LMGB sites increased from 123,500 to 202,700. This trend is continuing.

¹⁵ A Green Future: Our 25 Year Plan to Improve the Environment, HM Government, January 2018

¹⁶ Green Belt Policy: Landscape Briefing, Landscape Institute, April 2018

¹⁷ 'Green Belts in England – Key Facts', from the report *Green Belts: a greener future*, a joint publication of Natural England and the Campaign to Protect Rural England, published 2010

¹⁸ *Further Serious Loss of London's Green Belt*, London Green Belt Council, January 2019

- As in 2016, the counties with the greatest number of threats were Hertfordshire (70,787 houses), Surrey (29,381) and Essex (67,826). The three LPAs with the greatest number of threats were Thurrock (29,635), Dacorum (14,360) and East Hertfordshire (13,450).
 - The majority of the threats were identified in borough and district Local Plans, showing that there were firm plans to release these sites for housing.
 - The evidence suggests that the numbers will increase further as more Local Plans are progressed, in particular where housing targets have been increased in Strategic Housing Market Assessments (SHMAs) but not yet accounted for in Local Plans. Examples of this are Tunbridge Wells and Sevenoaks in Kent, Mole Valley and Epsom & Ewell in Surrey, and several LPAs in South East Essex.
- 2.6. The findings of this latest report reinforce the conclusions in *Safe Under Us?* about how theoretically protected LMGB is coming under threat from the Local Plan process, but specifically as a result of pressure from Central Government housing and planning policies. These undermine Green Belt protections, ensuring that responsibility lies with local authorities while at the same time giving added financial incentives to those councils that allow development in the LMGB and sanctions on those that do not.
- 2.7. These threats, through the Local Plan process, have become more numerous and widespread as these plans progress. The combined pressures of the 'Duty to Co-operate' and inflated housing targets continue to prevent local authorities from citing the Green Belt as a constraint as set out in NPPF.
- 2.8. Elected members report¹⁹ that there is concern locally about de-designation of the Green Belt and use of the NPPF to secure development on Green Belt land. There is also concern that this development will not provide affordable homes for local people^{20,21}. There is little evidence that any development in the LMGB is affordable housing. This is supported by CPRE research on housing affordability and density, which provided evidence that homes built in the Green Belt are not helping to solve the housing crisis²².
- 2.9. The evidence shows that the LMGB is being seriously eroded throughout most of its extent, but there is no body which takes a strategic view of the losses that are being sustained, with each one being considered only on a case-by-case basis.

3. Climate change

- 3.1. As one of the top five historical emitters of greenhouse gases, the UK has a huge responsibility in stemming the tide of the climate crisis²³. However, the latest research from the InterGovernmental Panel shows that even at 1.5C there is a high or very high risk of serious impacts occurring or climate-related hazards and limited ability to adapt. Public concern about the environment has reached a record high and Britons are now more worried about climate crisis than the economy²⁴.
- 3.2. In its most recent report²⁵, the InterGovernmental Panel on Climate Change notes that land is a key source and a sink of greenhouse gases. Sustainable land management can contribute to reducing the negative impacts of multiple stressors, including climate change, on ecosystems and societies.

¹⁹ Steve O'Connell, APPG oral evidence session, 1 May 2019

²⁰ *ibid*

²¹ Richard Knox-Johnston, APPG oral evidence session, 1 May 2019

²² The State of the Green Belt, CPRE, August 2018 <https://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4931-state-of-the-green-belt-2018>

²³ Mark Robinson, APPG oral evidence session, 1 May 2019

²⁴ *Public concern over environment reaches record high in UK*, The Guardian, 5 June 2019

²⁵ Climate Change and Land, IPCC, August 2019

- 3.3. The independent Committee on Climate Change has stated²⁶ that the UK's 2050 target of net-zero emissions of greenhouse gases requires a major transition in land use and farming practices. The Committee notes²⁷ the importance of land as a critical asset, providing clean water, food, timber and the natural regulation of hazards such as flooding.
- 3.4. Land also is an essential resource to mitigate climate change, naturally sequestering and storing carbon. Land needs to be managed more effectively otherwise its essential functions will not be maintained for future generations. In England the land area is too small to accommodate all the needs placed on it, especially loss of land to demands of development, to sea level rise, to increasing need for flood plains and at the same time, water retention, including increasing demand for reservoirs.
- 3.5. Land should be managed in a way that enables it to provide resilience to changing temperatures and weather patterns. There needs to be urgent action to stop soil erosion from increasingly major rainstorms.
- 3.6. There is a strong international element to protecting Green Belt because of its role in preventing climate breakdown, for example through carbon sequestration in mature woodland and soils, restoration of ecosystems on agricultural and other land and reduction of food miles.
- The Green Belt is a huge bank of carbon sequestration. The world's largest urban Green Belt in Ontario stores the CO₂ equivalent of 33 million cars, or the entire emissions of the state's transport, building, industrial and electricity sector combined.
 - The types of vegetation that are best at sequestering carbon, such as mature woodland and grassland, but also previously developed and agricultural land, are found in the Green Belt.
 - There is three times more carbon in the soil than in the atmosphere, and there is a need to stop concreting it over with new and unsustainable developments.
 - Likewise, there is an increasing focus on afforestation and restoration that the LMGB could play a major role in afforestation.
 - The Committee on Climate Change has concluded that fundamental reform is required to ensure land becomes a more effective carbon store.²⁸
- 3.7. The Green Belt also has an important role in climate change adaptation, reducing the heat island effect (particularly for the outer London suburbs) and, if the land is well-managed with plenty of vegetation cover, slowing the rate of rainwater percolation to the water table²⁹.
- 3.8. The LMGB can provide land for the planting of trees and the creation of forests in appropriate areas. Trees absorb carbon dioxide very effectively, reduce run-off and soil erosion and provide cooling for towns and cities where urban populations will be increasingly affected by high temperatures. As the Climate Change Committee have pointed out, there is an urgent need for greater tree planting and Government have responded by providing finance for tree planting.
- 3.9. There is no overall planning strategy for England, and this is a serious omission. A start could be made by a strategy for the LMGB. At present the governance of London's Green Belt is fragmented with each local planning authority having its own separate planning policy. A comprehensive policy is needed for the whole of the LMGB.
- 3.10. There is no doubt that the LMGB has a positive role in the absorption and sequestration of carbon. Both the continued loss of Green Belt land to development and insufficient attention to positive management of the

²⁶ Net Zero: the UK's Contribution to Stopping Global Warming, Committee on Climate Change, May 2019

²⁷ Land Use: Reducing Emissions and Preparing for Climate Change, Committee on Climate Change, November 2018

²⁸ Mark Robinson, APPG oral evidence session, 1 May 2019

²⁹ *ibid*

Green Belt that remains, erodes the benefits provided to communities in London and surrounding towns for climate change mitigation and adaptation. It increases the likelihood of serious impacts that will be difficult to adapt to.

4. Landscape and biodiversity

- 4.1. Positive evidence shows that the LMGB is in rude health. There are some localised problems but overall the LMGB scores highly on indicators of landscape quality, natural capital, public recreational and access value.
- 4.2. Critics of Green Belt together with LPAs where they have completed Green Belt reviews, make much of the land which is “not of the right quality”. There are also land speculators who deliberately allow Green Belt to become derelict so creating their case for development.
- 4.3. The positive response to these critics is: The purpose of the Green Belt is that it should be open no matter what state it is in. There should be stronger action taken by local planning authorities to enforce restoration to quality landscape. With proper levels of investment, the Green Belt landscape could be enhanced and improved to make it more attractive to those who wish to enjoy it.
- 4.4. Most (55%) of the LMGB has maintained its traditional rural character. This is a remarkable achievement for a landscape under pressure from high housing growth, the UK’s strongest regional economy³⁰, extensive transport infrastructure such as the four international airports and the M25 and proximity to millions of people. The by-product of preventing urban sprawl is that we have saved valuable areas of green space on London’s doorstep.
- 4.5. A quarter (24%) of the land is designated as an Area of Outstanding Natural Beauty. A positive example of the specific landscape value of the Green Belt is the countryside surrounding Charles Darwin’s home at Downe near Orpington. Londoners can enjoy his ‘landscape laboratory’, unchanged since he studied those landscapes 150 years ago, just minutes from the southern edge of London. This land is currently on the UK Tentative World Heritage List³¹ with the potential to go to full World Heritage Site status in the future.
- 4.6. Keeping land free from inappropriate development can also help to protect its biodiversity and the LMGB contains a rich diversity of biodiversity habitats. 13% of LMGB land is priority habitat identified by England’s Biodiversity Action Plan and 12 of the 20 national priority habitat types are present within the LMGB area. 5% of the LMGB is designated as being of special scientific interest (26,267 hectares are nationally important Sites of Special Scientific Interest), which is 2% of national SSSI total. There are over 7,000 hectares of nature reserves and 44% of all London Wildlife Trust sites are within the LMGB. Sites of local importance are extensive, covering 39% of the London Green Belt³².
- 4.7. Improved ecology and better networks can enhance habitats and sustain a broader variety of species. It also provides benefits in terms of water and flood management, climate change mitigation and health and wellbeing. There are several examples of where landscape-scale projects have been implemented within and around the capital.
- 4.8. The Government’s 25 Year Environment Plan commits to developing a Nature Recovery Network to complement and connect existing sites and notes the additional benefits of public enjoyment, pollination, carbon capture, water quality improvements and flood management. The Green Belt is the ideal place to achieve this.³³

³⁰ <https://www.ons.gov.uk/economy/grossvalueaddedgva/bulletins/regionalgrossvalueaddedbalanceduk/1998to2016#london-dominates-top-five-nuts3-regions>

³¹ <https://whc.unesco.org/en/tentativelists/5672/>

³² Mathew Frith, APPG oral evidence session, 1 May 2019

³³ *ibid*

- 4.9. The Government's 25 Year Environmental Plan³⁴ also promotes using our land more sustainably and creating new habitats for wildlife, to arrest the decline in native species and improve our biodiversity. It promotes action to protect endangered species and seeks opportunities to strengthen and enhance the protection of our countryside, rivers, coastline and wildlife habitats. It commits to creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network.
- 4.10. The LMGB plays a positive and important role in the amount of broad and mixed leaf woodland cover it provides – 18% of the entire area. By comparison, such woodland covers only 8% of England, falling far short of the 17% advocated by the Committee on Climate Change³⁵. The LMGB is likely to have seen a high proportion of recent new planting compared to other parts of the country, thanks to the achievements of the Community Forests at Thames Chase and Watling Chase which cover about 20,000 hectares. The recent major land acquisitions near St Albans by the Woodland Trust suggest that woodland cover in the LMGB will continue to expand in future.
- 4.11. The LMGB can play a positive role in contributing some of the objectives in the Government's 25 Year Environmental Plan. The Plan seeks to expand woodland cover and make sure that existing woodlands are better managed to maximise the range of benefits they provide. It aims to increase the supply of home-grown timber and increase woodland cover in England in line with its aspiration of 12% cover by 2060.
- 4.12. The third Natural Capital Report notes that there is strong evidence on the economic benefits of increased woodland cover, especially close to the towns and cities where it will have greatest recreational value. The Committee concludes that investment in an expansion of England's woodlands could generate very substantial benefits, particularly in terms of recreation opportunities and carbon capture and storage. Gains for wildlife and improvements in water quality would also be delivered.³⁶

5. Access and recreation

- 5.1. The LMGB plays an important and positive role in that public access to much of the LMGB is excellent, with nearly 50% more rights of way per hectare of land than the national average. Access has been made considerably easier through the continued achievements of the Regional Parks in the Colne and Lea Valleys, the creation of the National Cycle Network, long distance walking routes such as the London Loop and North Downs Way, and the local walking networks set up by some of the boroughs.
- 5.2. Survey work³⁷ commissioned for CPRE in 2016 showed that there are reasonably healthy rates of public visits to the Green Belt, with 27% of London residents having visited in the previous 12 months, compared to 26% in the East of England and 34% in the South East.
- 5.3. Within this overall picture, there are some areas that have more environmental assets than others. Perhaps unsurprisingly, the best concentrations of nature conservation and public access opportunities tend to be in areas also designated as AONB, in particular in the areas around Amersham and Wendover, to the north of Luton and in much of the Surrey Hills. There appears to be particular scope for improvement, however, in areas closer to Greater London such as around Staines and Weybridge, to the east of Orpington and Uxminster, and north of Barnet. These are important areas as they are the ones easiest to travel to for those living in central London.

³⁴ A Green Future: Our 25 Year Plan to Improve the Environment, HM Government, January 2018

³⁵ Richard Barnes, APPG oral evidence session, 4 June 2019

³⁶ The State of Natural Capital: Protecting and Improving Natural Capital for Prosperity and Wellbeing, Natural Capital Committee, January 2015

³⁷ TNS Omnibus Survey, fieldwork carried out between 24 and 29 September 2016, 883 adults aged over 16

- 5.4. There is a need to promote a positive policy to open up private land in collaboration with landowners, alongside investment from Government³⁸. However, it is not enough just to protect spaces we need to permit and engage. People are less confident of using country footpaths than they are of going to Hyde Park, because they are not sure they are allowed to. There is a need to strengthen the message “You are allowed to go. Please do.”³⁹
- 5.5. There is also the challenge of encouraging inclusive access to the Green Belt. The LMGB has a positive and constructive role to play in ensuring that all, whether from disadvantaged backgrounds or those of ethnic origin are welcome and encouraged to take advantage of the benefits of the countryside. An umbrella organisation for the LMGB could have a role of advertising the benefits of the LMGB and give advice on transport and access.
- 5.6. There is often criticism of golf courses and pony paddocks in the LMGB. They do, however, demonstrate the real value of a belt of open land to city residents for recreation and sport. They also can add and enhance the value of landscape so close to the city. Of interest is that although the number of golf courses in the Green Belt relative to the urban population surrounding it, is (at 0.07) well below the national average (0.13) for number of courses per 1,000 urban residents. The Green Belt also contains a wide variety of other sports pitches, which overall comprise 18% of all the pitches available to residents of urban areas within the Green Belt, and one pitch on average per 4,000 residents.
- 5.7. Access to the LMGB is very important for the positive uplift which it can provide. There needs to be an overall positive strategy and policy in order to ensure that people have access together with a responsible attitude to the “country code.”

6. Health and wellbeing

- 6.1. Increasing evidence is confirming that the importance of our relationship with nature has an impact on people’s health especially their mental health. There is an important beneficial health and well-being effect of nature and biodiversity encapsulated in the countryside. 80% of people in the UK live in urban areas (DEFRA 2004), so a need for green nature is considerable and growing.
- 6.2. For those living in urban areas such as London, there is a growing need for access to green nature as there is evidence that “less green nature means reduced mental well-being, or at least less opportunity to recover from stress” (Pretty et al, 2005a: p2)
- 6.3. The more the London Green Belt boundaries are moved away from the centre of London, the greater the challenge and expense to obtain that access. However, this important evidence appears to have little influence on planners and little effect, so far, on Government public health policies.
- 6.4. Research has shown that:
- When examining the effects of nature and health, natural spaces provide services beneficial for mental and physical health to people from all sections of society and of all ages. This is true for urban and rural green space, space with high and low biodiversity, small and large spaces, gardens and farms. There are no counterfactuals.
 - Neuroscience shows that people benefit from situations of attentiveness or immersion, such as are found in landscape and nature, friends and other people, or craft. This closes down mental chatter. Evolution has not provided us with an off-switch, so we have learned to seek out calming situations such as sunsets, landscape and fires.⁴⁰

³⁸ Merrick Denton-Thompson, APPG oral evidence session, 4 June 2019

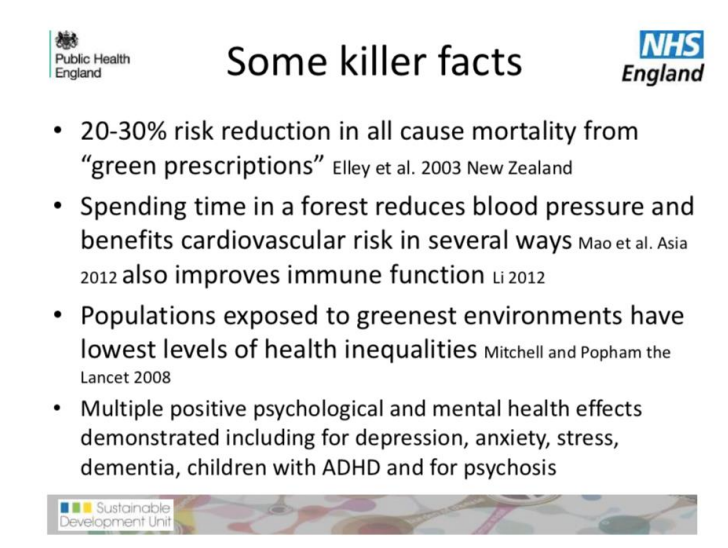
³⁹ Professor Jules Pretty, APPG oral evidence session, 11th September 2018

⁴⁰ Professor Jules Pretty, APPG oral evidence session, 11th September 2018

- Kaplan and Kaplan⁴¹ have shown that engaging with nature replenishes our mental fatigue, helps us recover from stress and restores concentration levels. Through their research they encountered a broad range of individuals for whom green spaces were a salient and even life-saving concern. They observed that it is rare to find an opportunity for such diverse and substantial benefits available at so modest a cost.
- The World Health Organisation (WHO) states that “green spaces are important to mental health”. It found that having access to green spaces can reduce health inequalities, improve well-being, and aid in treatment of mental illness. Some analysis suggests that physical activity, in a natural environment, can help remedy mild depression and reduce physiological stress indicators.⁴²
- In 2014, 19.7% of people in the UK aged 16 and older showed symptoms of anxiety or depression. A report⁴³ by the Mental Health Foundation highlights that, every week, a sixth of adults experience symptoms of a common mental health problem, such as anxiety or depression, and one in five has considered taking their own life at some point. In 2014, suicide was the leading cause of death for men under 50 years of age in England and Wales, and for women aged 20–34. The demographic with the highest suicide rate (of 23.9 per 100,000 population) was men aged 45–59. The report notes that in 2013, the Chief Medical Officer estimated that the wider costs of mental health problems to the UK economy are £70–100 billion per year – 4.5% of gross domestic product (GDP).

6.5. The NHS acknowledges the importance of nature and open spaces on health and well-being, as set out in the following chart.

Figure 2: Key facts on the natural environment and health⁴⁴



6.6. In 2017, The Guardian newspaper reported⁴⁵ that the NHS had prescribed a record number of antidepressants the previous year, fuelling an upward trend that has seen the number of pills given to patients more than double over the last decade. Annual data from NHS Digital showed that prescriptions for 64.7m items of

⁴¹ The Experience of Nature: A Psychological Perspective, Rachel Kaplan and Stephen Kaplan, University of Michigan, 1989

⁴² <http://www.who.int/sustainable-development/cities/health-risks/urban-green-space/en/>

⁴³ Fundamental Facts About Mental Health, Mental Health Foundation, 2016

⁴⁴ “How the Landscape Can Improve Health and Wellbeing” (Landscapes for Life Conference), Dr Caroline Jessel, June 2016

⁴⁵ “NHS prescribed record number of antidepressants last year”, The Guardian, 29 June 2017

antidepressants – an all-time high – were dispensed in England in 2016. The Evening Standard reported⁴⁶ that the number of antidepressant items prescribed in London and the Thames Valley area increased by more than 18 per cent in the three years to March 2017, with some 7.8 million items prescribed in 2016/ 17.

- 6.7. The UK National Ecosystem Assessment⁴⁷ concluded that the importance of green spaces for society's health and general wellbeing is not fully appreciated. It supported other research and found that access to green space is essential for good mental and physical health, childhood development and social cohesion.
- 6.8. The research shows that immunoregulatory response to stress develops in early life and is shaped largely by our microbial environment. Professor Lowry, of the University of Colorado Boulder, said that "It has already been very well documented that exposure to pets and rural environments during development is beneficial in terms of reducing risk of asthma and allergies later in life".
- 6.9. There has been some more recent research into immunology and the importance of a rural environment, surrounded by animals. (University of Colorado at Boulder – April 2018) The research shows that if a child is brought up in the countryside and in the proximity of animals, they are likely to have a more stress-resilient immune system that could lead to a lower risk of mental illness.
- 6.10. This research shows the important and significant role of providing access to nature for individuals, especially children, to the countryside and the positive importance that London's Green Belt can and should play.
- 6.11. As the following table produced by Maller et al points out "public health strategies are yet to maximise the untapped resource nature provides, including the benefits of nature contact as an upstream health promotion for populations".

⁴⁶ "Why are prescriptions of antidepressants at an all-time high?", Evening Standard, 30 August 2017

⁴⁷ UK National Ecosystem Assessment: Synthesis of the Key Findings, Defra et al, June 2011 <http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx>

Table 1: What the research demonstrates with certainty (Maller *et al*, 2006)

[Key: A=anecdotal; T=theoretical; E= empirical]

Assertion	Evidence			Key references
	A	T	E	
There are some known beneficial physiological effects that occur when humans encounter, observe or otherwise positively interact with animals, plants, landscapes or wilderness	✓	✓	✓	Friedmann <i>et al</i> , 1983a; Friedmann <i>et al</i> , 1983b; Parsons, 1991; Ulrich <i>et al</i> , 1991; Rohde & Kendle, 1994; Beck & Katcher, 1996; Frumkin, 2001
Natural environments foster recovery from mental fatigue and are restorative	✓	✓	✓	Furnass, 1979; Kaplan & Kaplan, 1989; Kaplan & Kaplan, 1990; Hartig <i>et al</i> , 1991; Kaplan, 1995
There are established methods of nature-based therapy (including wilderness, horticultural and animal-assisted therapy, among others) that have success healing patients who previously have not responded to treatment	✓	✓	✓	Levinson, 1969; Katcher & Beck, 1983; Beck <i>et al</i> , 1986; Lewis, 1996; Crisp & O'Donnell, 1998; Russell <i>et al</i> , 1999; Fawcett & Gullone, 2001; Pryor, 2003
When given a choice people prefer natural environments (particularly those with water features, large old trees, intact vegetation or minimal human influence) to urban ones, regardless of nationality or culture		✓	✓	Parsons, 1991; Newell, 1997; Herzog <i>et al</i> , 2000
The majority of places that people consider favourite or restorative are natural places, and being in these places is recuperative	✓	✓	✓	Kaplan & Kaplan, 1989; Rohde & Kendle, 1994; Korpela & Hartig, 1996; Herzog <i>et al</i> , 1997; Newell, 1997; Herzog <i>et al</i> , 2000
People have a more positive outlook on life and higher life satisfaction when in proximity to nature (particularly in urban areas)	✓	✓	✓	Kaplan & Kaplan, 1989; Kaplan, 1992; Lewis, 1996; Leather <i>et al</i> , 1998; Kuo, 2001; Kuo & Sullivan, 2001
Exposure to natural environments enhances the ability to cope with and recover from stress, cope with subsequent stress and recover from illness and injury	✓	✓	✓	Ulrich, 1984; Parsons, 1991; Ulrich <i>et al</i> , 1991
Observing nature can restore concentration and improve productivity	✓	✓	✓	Tennessen & Cimprich, 1995; Leather <i>et al</i> , 1998; Taylor <i>et al</i> , 2001
Having nature in close proximity, or just knowing it exists, is important to people, regardless of whether they are regular 'users' of it	✓	✓	✓	Kaplan & Kaplan 1989; Cordell <i>et al</i> , 1998

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6.12. From these reports and research, it is clear that the LMGB has a very important role to play by giving good access to the countryside so enabling considerable savings in NHS spending. Defra has estimated⁴⁸ that universal access to quality green spaces could save the NHS around £2.1bn every year. These savings need to be set against other economic gains which are quoted by those who wish to develop the countryside.

6.13. The potential of green areas is not currently being fully realised. The London Environmental Strategy⁴⁹ recognises that access to good quality green space can have a big impact on people's health and quality of life. However, it found that widespread areas across London are classed as deficient in access to public open space.

6.14. The Government's 25 Year Environmental Plan notes that:

- We are fortunate to have accessible natural spaces in every county, mostly free to enter, and a network of public rights of way. However, in the most deprived areas of England, people tend to have the poorest health and significantly less green space than wealthier areas. This is particularly important in London where those who need access to the countryside have furthest to travel.

⁴⁸ Defra's Climate Change Plan, Defra, March 2010

⁴⁹ London Environment Strategy, Mayor of London, May 2018

- It is their intention that this should change, so that everyone has the chance to benefit from getting close to nature and appreciating all it has to offer. Government's aim is for more people, from all backgrounds, to engage with and spend time in green and blue spaces in their everyday lives.
- Spending time in the natural environment – as a resident or a visitor – improves our mental health and feelings of wellbeing. It can reduce stress, fatigue, anxiety and depression. It can help boost immune systems, encourage physical activity and may reduce the risk of chronic diseases such as asthma. It also has the ability to combat loneliness and bind communities together. As a largely urban society, the need for access to green spaces is considerable.
- Support should be given to programmes that encourage physical activity, including in outdoor settings. The Government has made a commitment to scope out how it could connect people more systematically with green space to improve mental health, using the natural environment as a resource for preventative and therapeutic purposes. This will be in line with the Prevention Concordat for Better Mental Health and support the Government's new commitments on children's mental health.
- It wants to encourage mental health service providers to explore the potential offered by environmental therapies and to do more to spread the word about the benefits of nature. The Government commits to promoting collaboration between the health and environment sectors, at national and local level.
- A wide range of activity is under way to help people experience the benefits of access to green space. A number of outdoor sports and leisure organisations, greenspace managers, environmental bodies and schools encourage people to participate in activities in the countryside. It highlights the forest school approach which encourages children to explore nature and have a relationship with the outdoors. The new science and geography curriculums and qualifications encourage pupils to undertake fieldwork as part of their study. Farms in both rural and urban locations host groups of school children and share their knowledge about the environment and where food comes from.
- The Government wants to make it easier for schools and Pupil Referral Units to take pupils on trips to the countryside on a regular basis where they can combine learning with feeling healthier and happier.⁵⁰ This might involve class visits to a farm, a local nature reserve, woodland or National Park.
- It welcomes actions by some health professionals who have adopted a practice known as 'green prescribing', a type of social prescribing where nature-based interventions are used to treat people with health conditions. Examples of interventions include gardening, conservation, care farms and green gyms.

6.15. Playing and learning outside is a fundamental part of childhood, and helps children grow up healthy and appreciating the value of nature. Not all children, especially those living in London, have the luxury of a family garden. It is important that we find alternative ways to give them better access to the countryside, especially that supplied by the Green Belt.

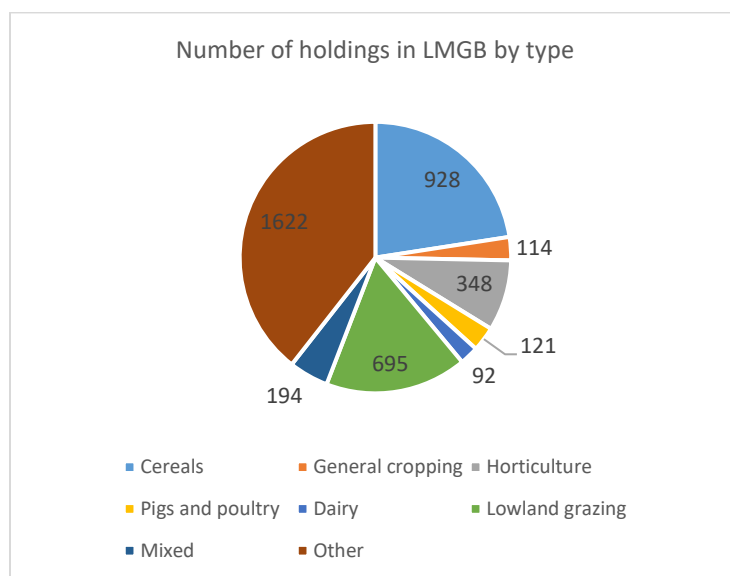
6.16. The protection and preservation of the LMGB can be a positive and vitally important step in helping the Government to achieve its aims and objectives in the 25 Year Environment Plan. The LMGB is a significant natural resource on the doorstep of Greater London and the several large towns that surround it and can play an extremely important role in providing access to natural spaces for all people, young and old, including those who are disadvantaged. Erosion of the LMGB will make it increasingly difficult for the Government to meet its ambitions in the southeast of England.

7. Food and farming

⁵⁰ A Green Future: Our 25 Year Plan to Improve the Environment, HM Government, January 2018

- 7.1. Agriculture makes a major contribution to a productive and well-managed Green Belt and there is a diversity of types and sizes of holding within the LMGB. Although there are a significant number of sizeable holdings (nearly a fifth of holdings are over 100 hectares), almost half of all holdings are small in size (46% are less than 20 hectares).⁵¹

Figure 1: Agricultural holdings in LMGB⁵²



- 7.2. Ensuring that agricultural land around London is and remains profitable and productive is vital to meet London's growing food needs and to retain the character of a significant proportion of the Green Belt. It is estimated that the population of London will increase by 13.7% over the next 20 years alongside an increase of 8.1% for South East England: an additional 1.5 million people by 2024 and 3 million by 2045. An additional nine million meals per day will need to be provided by farmers to meet this demand.
- 7.3. Although the UK is largely self-sufficient in fresh milk, bread and eggs, we have large trade deficits for fruit and vegetables (£10.3 billion imports compared with £1.1 billion exports) and meat (£6.2 billion imports compared with £1.6 billion exports). With total UK food and drink exports valued at £20.1 billion and imports at £42.6 billion, the UK had an overall trade deficit of £22.5 billion in the sector. Helping Britain to become more self-sufficient in food can only be achieved with high quality farmland and sustainable land management policies.
- 7.4. However, many farmers are under pressure from development, either directly from developers or as a result of neighbouring development encroaching on their farm businesses. High land values and proximity to metropolitan areas can restrict how farms can restructure, invest or diversify. This can lead to even greater development pressures where farms cease to be viable and the landowner then seeks to capitalise on their assets. Productive, profitable farming is one of the best ways to secure against inappropriate development. Sustainable farming is typically maintained by subsidy and on-farm diversification, but within the Green Belt there is likely to be an additional need for diversification proposals to be sensitive to protecting the sense of openness.
- 7.5. They also have the challenge of obtaining planning permission for any development on their land. Each local

⁵¹ Green Belts: A Greener Future, CPRE and Natural England, 2010

⁵² ibid

planning authority appears to have their own policies with regard to farming and this leads to frustration and misunderstanding. An overall authority for the whole of London's Green Belt would help alleviate the situation.

- 7.6. The farm shop has, in many cases, become a destination for people to visit farms to buy high quality products and enjoy a day out in the countryside, to learn about farming and wildlife as well as just to relax. However, they can only ever play a small part in the selling of produce and most people will continue to rely principally on supermarkets and to a lesser extent on other urban shops to buy their food.
- 7.7. Farmers markets are another opportunity for people to buy good quality, fresh, locally produced food with low food miles but, like farm shops, they are small volume outlets, often catering for niche products and they cannot provide a significant market for farm produce. Nevertheless, the increasing popularity of farm shops and farmers markets demonstrates the growing public interest in buying locally-produced, fresh food and shows an awareness of the impact of food miles on our environment. Farms within the LMGB have the ability to provide such appealing products to our largest city, home to over eight million people. It was reported to us that there is a significant unmet demand from London restaurants for high quality locally grown produce.⁵³
- 7.8. Community farms have a useful role to play within the Green Belt, precisely because of their proximity to large peri-urban populations. A 2012 report for the Making Local Food Work consortium found a number of good practice examples in Green Belts across England, including two in the Metropolitan Green Belt.⁵⁴ These farms are all about engaging their local community in the farm and its produce, either through growing the produce and managing the farm, purchasing vegetable boxes, educating about sustainable food supply or sometimes through share ownership. They are also providers of jobs, apprenticeships and skills development. Workers at Sutton Community Farm told us⁵⁵ that it is largely their proximity to London and access to its population that enables them to provide these benefits.
- 7.9. Farm diversification projects can add to a positive Green Belt experience, for example Open Farm Sunday has been a great success in helping visitors to understand farming and promoting the value of farming in the Green Belt. Increasing numbers of farmers understand the importance of educating the public about the role and contribution of farming to our food production and to maintaining the countryside. Many farmers welcome people onto their farms for education and recreation where this is compatible with good land and livestock management.
- 7.10. Agreements between farmers and Natural England to conserve and manage farmland for public access and wildlife cover 51% of all LMGB land in agricultural use. Farms within LMGB are criss-crossed by many kilometres of public rights of way, although these are not always in the best locations to be compatible with farming activities. There are opportunities to enhance public access on farmland, for example by diverting public rights of way while maintaining levels of access in order to promote greater safety and a better recreational experience.
- 7.11. Agri-environment schemes in the UK have funded environmental improvements on agricultural land for many years.⁵⁶ The proposed Environmental Land Management System is a new opportunity to pay land managers public money to deliver public goods.⁵⁷ These could include benefits of environmental protection, public access, cultural and natural heritage, climate change mitigation and adaptation, health and welfare of livestock, plant health and improved productivity.⁵⁸

⁵³ Alice Brown, Sutton Community Farm, pers comm 4 February 2019

⁵⁴ MLFW March 2012, op cit.

⁵⁵ ibid

⁵⁶ Paul Miner, APPG oral evidence session, 4 June 2019

⁵⁷ Richard Hebditch, APPG oral evidence session, 4 June 2019

⁵⁸ https://publications.parliament.uk/pa/bills/cbill/2017-2019/0292/cbill_2017-20190292_en_2.htm#pt1-l1g1

8. A clear vision for the future of the LMGB

- 8.1. The Government's 25 Year Environmental Plan commits to enhancement of the Green Belt to make this land 'breathing space' for our urban populations to enjoy and our diverse wildlife to flourish, while delivering the homes this country needs. The fundamental objective of the LMGB is more important now than ever and should be protected in perpetuity.
- 8.2. Our vision is that London's Green Belt is enhanced and protected so that those living in and around London can enjoy recreational spaces; wildlife and tranquility; clean air and water; and relief from heat. It is a space, not seen as wasted land waiting for development, but used to meet some of the biggest challenges facing society, from climate change mitigation and adaptation, to improving the health and wellbeing of communities.
- 8.3. In supporting many of the aims and objectives of the Government's 25 Year Environment Plan, we recommend a number of actions:
 - Reconfirm the boundaries of the LMGB in perpetuity, similar to the confirmation of SSSIs as a result of the 1981 Wildlife and Countryside Act;
 - Instigate a full strategic review by Government of land use within the LMGB, ensuring delivery of:
 - Transforming the state of Natural Capital, securing clean air, clean water, restored soils and ecosystems;
 - Creation of new access plans for health and wellbeing;
 - Plans to transform the state of childhood by increasing inclusive access to the LMGB, for learning, play and social development.
 - Provide structural support for farming in the urban fringe to restore soils and produce food sustainably for local consumption;
 - Reconnection of people with food growing, orchards, coppice and high forest woodland;
 - Built in resilience to protect urban areas and improve the micro-climate;
 - Create a long term (25 year), statutory Strategic Plan for the LMGB, similar to Management Plans for AONBs, that takes a Natural Capital approach to valuing the benefits of the LMGB. This Strategic Plan could guide and apply the proposed new Environmental Land Management System within the LMGB, for example:
 - Developing a local nature recovery network covering the LMGB in collaboration with stakeholders and communities, which could be used to guide investment in enhancement projects and promote areas for recreation, and be adhered to by planning authorities in decision-making;
 - Encouraging investment in tree planting, regeneration and the extension of forests and copses especially in low-quality agricultural land, to improve the landscape and assist in flood prevention and CO₂ absorption;
 - Encouraging landowners to enhance inclusive public accessibility to parts of the LMGB;
 - Investigating ways to promote public recreation within the LMGB;
 - Prioritising reversal of biodiversity loss and enhancement of ecological networks;
 - Promoting outlets for local farm produce to increase its availability to London and the South East.
 - Complement and supporting the existing AONB Management Plans and the Regional Park Plans in the Lee and Colne Valleys and avoid duplicating or cutting across them.
 - Establish an Advisory Council to manage the production of the Strategic Plan using the National Character Map as a framework, harnessing the power of Citizen Science for delivery and public investment from the Environment Agency, Natural England, Forestry Commission, Historic England, Rural Payments

Agency and local Government. The Council should include representation from these and other relevant Government agencies, AONBs and regional parks, as well as key NGOs with an interest in the management of the LMGB

8.4. The 2016 CPRE report, *Our Green Belt: Worth Investing In*, made the following recommendations to improve nature conservation and recreation that could be applied directly to the LMGB:

- Use regional park funding models more widely. The lack of sustainable funding is a major barrier to implementing change. We investigated a variety of funding models including a Regional Park, a Community Forest, a Local Nature Partnership and two Nature Improvement Areas. Of these, the Lee Valley Regional Park Authority to date has the most sustainable funding model. This model, or elements of it, would become a model for London's Green Belt.
- Market the Green Belt as a visitor destination in its own right. This is already being done by the Friends of the Ontario Greenbelt around Toronto, Canada. In England, initiatives like the Oxford Green Belt Way led by CPRE Oxfordshire have helped to provide a sense of identity and make the Green Belt feel more accessible. The Lee Valley Regional Park promotes local walks and places of interest within the Green Belt areas that it covers.

8.5. We also recommend some actions in relation to farming in the LMGB:

- Farmland and sustainable farming activities should continue to be supported in Green Belt, with national and local planning policy that promotes sustainable land management. British produce is high quality, traceable and produced to world leading environmental and animal welfare standards. Farming in the LMGB is well-placed to serve local markets. As Britain seeks to become more self-sufficient in food, decision makers should strategically assess the impact of other development on farmland and the future growth of any adjacent farm businesses.
- Planning policy for farms in the LMGB should seek to promote diversification opportunities that will help provide public benefits; including for leisure and recreation, local food production, opportunities to increase biodiversity and local wildlife.