



# All-Party Parliamentary Group for London's Green Belt

## A Positive Vision for London's Green Belt



The  
countryside  
charity



London  
**Green Belt Council**  
Protecting London's green belt

The London Green Belt Council (LGBC) and CPRE, the countryside charity, would like to thank the following for their contributions to the research and drafting of this paper

- Hilary Livesey
- Paul Miner
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The All Party Parliamentary Group for LMGB exists to advocate Green Belt-friendly planning policies and contribute to the debate on how best to achieve sustainable development that protects LMGB for the benefit of future generations. The Group is chaired by Crispin Blunt MP and its co-chair is Lord Rogers of Riverside.

More details of the group can be found at <https://publications.parliament.uk/pa/cm/cmallparty/180131/londons-green-belt.htm>

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## A Positive Vision for London's Green Belt

*London's Green Belt provides an important long-term benefit for  
all those living in, around and visiting London;  
its landscape beauty and the haven it provides for an improved and thriving wildlife;  
its significant contribution to the mitigation of the climate emergency and enhancing people's health and  
wellbeing;  
the facilities it offers for outdoor recreation, and its resource for food and farming close to London;  
all this in addition to its traditional role of containing urban sprawl and encouraging regeneration.*

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## Foreword

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*“We have.. highlighted the positive impact that Green Belt has on climate change, landscape and biodiversity, access and recreation, health and wellbeing, food and agriculture. We have chosen to focus on the positive benefits of London's Green Belt as we hope that the argument for its protection will then speak for itself.”*

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The APPG for London's Green Belt was set up in response to rapidly increasing pressure for development on Green Belt Land that has escalated over the last few years and is now reaching a crisis point.

As a society, we have to decide whether or not we value Green Belt sufficiently to prevent its erosion and subsequent disappearance in the coming decades. To give some context to the scale of the threat, in 1940, the greater urban areas of London and Los Angeles were similar. Since then, without any Green Belt protection, Los Angeles has sprawled to the extent that it now cover an area that would stretch from Cambridge to Brighton if it was overlaid on the UK.

Over the past eighty years, the London Metropolitan Green Belt has therefore served its purpose in prevent urban sprawl, and maintaining a green lung around our capital city. This paper outlines the many positive reasons why the Green Belt is so important, and why it should be protected and its natural assets maximised. It is not purely a pleasant backdrop to our capital, but a living, breathing environment that serves a wide range of vital functions, including absorbing CO<sub>2</sub>, improving public physical and mental health, protecting the capital's food security, promoting active recreation, and contributing to UK biodiversity, forestation and soil quality. We have therefore highlighted the positive impact that Green Belt has on climate change, landscape and biodiversity, access and recreation, health and wellbeing, food and agriculture.

We have chosen to focus on the positive benefits of London's Green Belt as we hope that the argument for its protection will then speak for itself.

The main threat to the Green Belt is from building development. Whilst there is a recognised housing shortage in the UK, inflexible new-homes targets for local authorities are encouraging them to take Green Belt land, which developers prefer, rather than brownfield. There is more than enough brownfield land in our urban areas to fulfil our housing needs. Unfortunately, developers make a greater profit from building large homes on Green Belt land than they do providing affordable housing on brown-field urban sites.

We would therefore argue that the National Policy Planning Framework needs to be reviewed and amended to ensure that the gradual erosion of the Green Belt does not reach epidemic and terminal proportions so that this vital asset is much better protected from inappropriate development. Once Green Belt has been developed, it is impossible to get it back again.

The Paper makes a number of proposals as to how we can start to work together to maximise the benefits of this valuable resource and how we can build resilience and structure to ensure its long-term survival for the benefit of our society and the environment.

Finally, we would like to express our sincere thanks to all the organisations and individuals that have contributed evidence and materials to enable this paper to come together, and also special thanks to CPRE and LGBC who have helped the APPG drive this agenda forward so effectively.

*Signature*

Crispin Blunt MP  
Co-Chair, All-Party Parliamentary Group for London's Green Belt

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## Preface

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*“London’s Green Belt is already seen as a model for cities around the world, but it could be so much more with a comprehensive strategy to make it an even more valuable asset, providing important benefits for those living in and around its boundaries.”*

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Since its inception, London’s Green Belt, or the London Metropolitan Green Belt (LMGB), has prevented urban sprawl. It has been very successful in this role, without which, following the example of Los Angeles, London could have stretched from Brighton to Cambridge, giving people who live and work in or around London little opportunity to access the benefits of the countryside.

The significant changes that are needed to address the climate emergency, the increasing disconnect of young people from nature and the considerable amount of evidence in support of green space and its beneficial effects on health and wellbeing supports the fact that London’s Green Belt is more important now than it has ever been.

London’s Green Belt also has the ability to sequester carbon, reduce the threat of flooding and provide clean air and fresh water. In addition, there is the increasing role of mitigating urban heating as well as providing space for those living in urban communities to relax, play and explore.

This report has been compiled to promote the need for the positive contribution that the London’s Green Belt is making and will increasingly make for everyone in and around it. In order to ensure these benefits, there is an urgent need for a long-term strategy that recognises, enhances and promotes London’s Green Belt.

The strategy should also deal with improving access to the London’s Green Belt, improving and preserving its landscape, supporting the recovery of nature and setting consistent planning parameters.

There is a need for a consultative body to create this positive strategy and provide overall supervision and advice on the preservation and improvement of this vital asset.

London’s Green Belt is already seen as a model for cities around the world, but it could be so much more with a comprehensive strategy to make it an even more valuable asset, providing important benefits for those living in and around its boundaries.

Richard Knox-Johnston  
**Chair, The London Green Belt Council**

Su Sayer OBE  
**Chair, CPRE The countryside charity**

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## Executive Summary

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*“There are indeed many good things in life which may be unequally apportioned and no such serious loss arise; but the need of quiet, the need of air, and I believe the sight of sky and of things growing, seem human needs, common to all men.”*

*Octavia Hill (1838 – 1912)*

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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.

The conflict between development and Green Belt openness has been a constant theme throughout the history of the policy and has grown significantly in recent years. However, the need for Green Belts has never been greater in light of addressing the climate emergency and the growing disconnect of people and nature.

Research has shown that there are plans for in excess of 200,000 houses in the London Metropolitan Green Belt (LMGB<sup>1</sup>). However, there is little evidence that any of these homes will be for key workers, 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 the largest of all England's Green Belts and provides a wide range of positive benefits to all sections of society, not least for the benefit of London and Londoners:

- **Climate mitigation and adaptation:** The LMGB has a positive and key role on supporting efforts to address the climate emergency. For example, providing open land for carbon sequestration through tree planting, the restoration of wildlife and reduction of food miles. It also helps us adapt to a changing climate by cooling our towns and cities as well as absorbing rainwater so reducing the impact of flooding. Green Belt planning policy also generally plays a key role in preventing urban sprawl and low density, car-dependent development, and so helps to reduce carbon emissions in that regard.
- **Landscape and biodiversity:** The LMGB contains landscapes that are highly valued, both in terms of their scenic beauty and for providing space for nature. For example, nearly a quarter of the LMGB is designated as being of outstanding natural beauty (AONB), there are 26,267 ha of Sites of Special Scientific Interest and there are over 5,000 hectares designated as Local Nature Reserves. These important spaces, near to where people live, boost the health and wellbeing of communities.
- **Trees:** 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 Plan for the Environment. There is already increased tree planting in the LMGB, which is contributing to the landscape, providing a potential economic benefit as well as sequestering carbon.
- **Access and recreation:** 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 the enjoyment of 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.
- **Health and wellbeing:** The countryside on our doorstep enables us to spend time being active or relaxing in a natural setting. This reduces stress and contributes to mental and physical health. The cost of poor mental and physical health is considerable, both economically and on the wellbeing of people.

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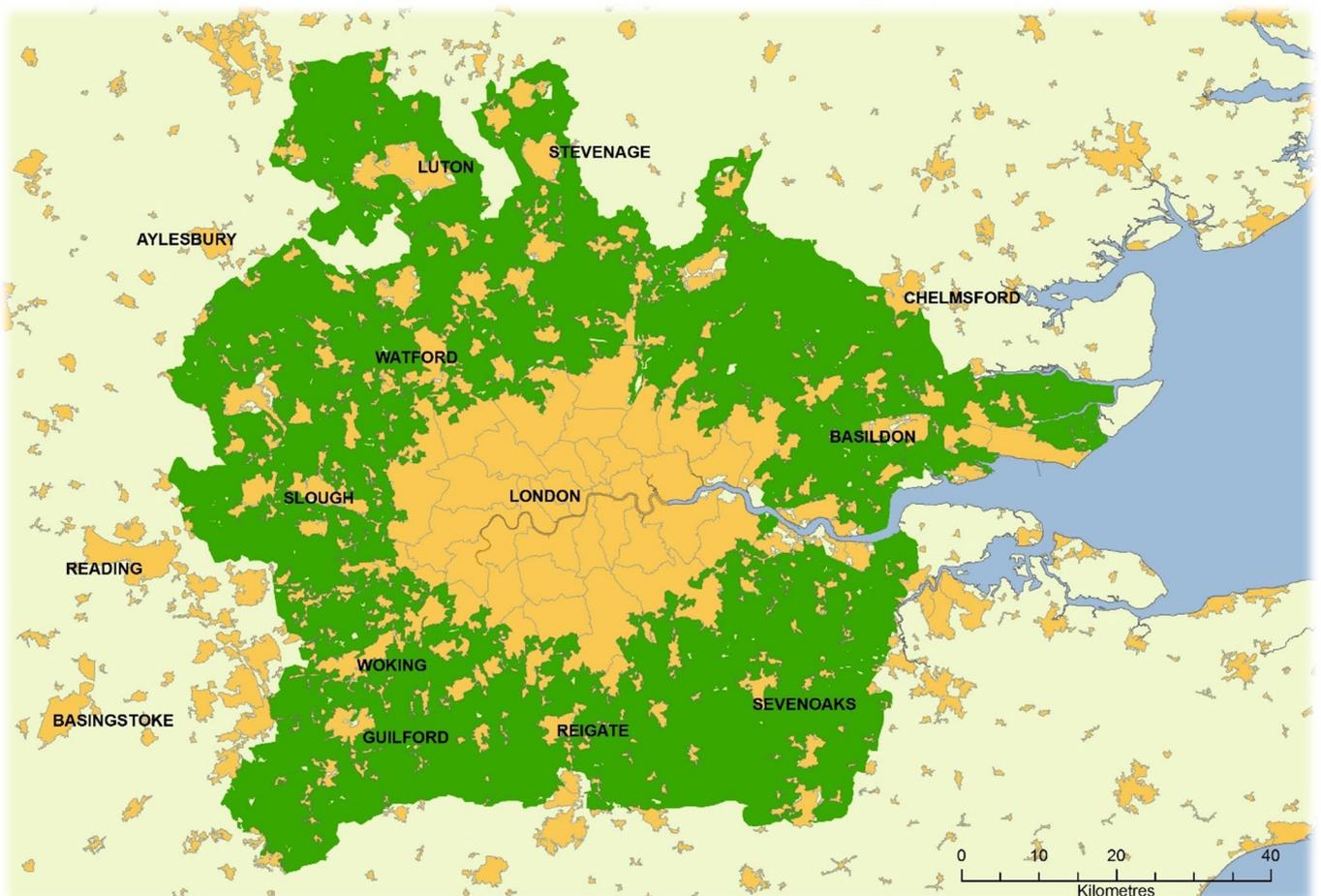
<sup>1</sup> The initials LMGB are used to refer to the London Metropolitan Green Belt herewith and in the main body of this report.

- **Local food:** Food produced locally to London in the LMGB provides high quality, traceable and freshly grown produce for Londoners. Visits to local working farms increases our connection with the natural world around us and has a valuable role to play in education and wellbeing.

The LMGB already provides Londoners with so much, but it could provide so much more. To further the promotion, enhancement and protection of the LMGB we recommend:

- That an **Advisory Council** be set up to conduct a comprehensive review of the LMGB and create a 25 year strategy for its future, following the objectives as set out in the Government's 25 Year Environment Plan.
- That new **funding** be provided on the same basis as that for National or Regional Parks, to improve the landscape, biodiversity, water retention, and the carbon sequestration abilities of the LMGB. This would need to be integrated with the proposed Environmental Land Management Schemes for farmers, to ensure it delivers multiple benefits for local communities.
- That action be taken to ensure that everyone in and around London, and further afield, feels able to **access the benefits of the countryside** close at hand.

## The London Metropolitan Green Belt



The London Metropolitan Green Belt is an area of land around London designated in statutory local plans. It consists of land in local authorities in the counties of Bedfordshire, Berkshire, Buckinghamshire, Essex, Hertfordshire, Kent and Surrey, as well as the outer London Boroughs within the Greater London Authority.

## Introduction

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- LMGB first proposed 1935
  - Largest of England's 14 Green Belts and 514,395 hectares
  - LMGB makes up 32.2% of all English Green Belts
  - 92% of LMGB is undeveloped
  - 58% of LMGB is registered as agricultural
  - 16% of LMGB is woodland
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- 1.1 The London Metropolitan Green Belt (LMGB) is and has been a major asset to those who live in and around London. It is needed more than ever to support efforts to address the climate crisis, enhance health and wellbeing and address the disconnect of urban communities from nature.
- 1.2 The LMGB was first proposed in 1935 and was established 20 years later. In 1955, Housing Minister Duncan Sandys issued a Circular that urged all local planning authorities 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 contains 32.2% of the total area of all Green Belt land in England.
- 1.3 The majority (92%) of the LMGB is undeveloped land, although only 58% of the land is registered as being in agricultural use and 16% is woodland.<sup>2</sup> Of the remainder, much is used for 'semi-urban' uses relying on open land for recreation, such as golf courses, horse training and paddocks.
- 1.4 Green Belt is acknowledged internationally as an excellent demonstration of best practice in land use planning. It has 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 among the public and policymakers in their understanding of what Green Belt is, what it is for and what it can be.
- 1.5 The conflict between development and retention of the LMGB as a belt of open land has been a constant theme throughout the history of the policy. However, Green Belt has become an increasingly divisive topic. Current planning policy is such that the LMGB is more vulnerable to erosion today than at any other time.<sup>3</sup> Green Belt is often cited as the cause of the housing crisis, and its removal as being the silver bullet to solve it.
- 1.6 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 LMGB, to prevent the outward sprawl of London and encroachment into the countryside, are more important today than ever<sup>4</sup> because of the increasing need to find sustainable locations for new homes. There is, in addition, an increasing demand for school and recreational development, which often results in large building and industrial fencing reducing the openness of the Green Belt.
- 1.7 Research by CPRE the countryside charity has shown that Green Belts across England are experiencing an unprecedented level of threat from development. However, housing development that has occurred on Green Belt is unaffordable to those that need it: just 1 in 4 homes with planning permission, both overall

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<sup>2</sup> *Green Belts: A Greener Future*, CPRE and Natural England, 2010

<sup>3</sup> Green Belt Policy: Landscape Briefing, Landscape Institute, April 2018

<sup>4</sup> Merrick Denton-Thompson, APPG oral evidence session, 4 June 2019

and within the LMGB, meet the government's definition of affordability.<sup>5</sup> At 80% of market rents, the cost of an 'affordable' home is still out of reach for low-income families, particularly in and around London. At the same time, there is space for well over 280,000 homes on previously developed land within Greater London alone.<sup>6</sup> This is just the tip of the iceberg, and these sites such be developed first. For further discussion see Annex A.

1.8 National planning policy defines five purposes of the Green Belt:<sup>7</sup>

- a) To check the unrestricted sprawl of 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
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

1.9 The LMGB performs all of these important purposes. In addition, it provides **natural capital**. Natural capital describes the economic benefits to people of the services the environment provides at no cost. It is the aim of the Government's 25 Year Environment Plan to set gold standards in the use of natural capital in decision-making.<sup>8</sup> The natural capital within the Green Belt performs a range of important environmental functions that 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 the climate emergency
- Improving air quality, by 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
- Priority habitats for wildlife
- Land to grow food and other crops

1.10 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 Belts across England.<sup>9</sup>

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<sup>5</sup> See supporting regional tables in *Space to Breathe: A State of the Green Belt Report*, CPRE, October 2019

<sup>6</sup> *State of Brownfield 2019*, CPRE, March 2019

<sup>7</sup> National Planning Policy Framework, para 134, Ministry of Housing, Communities and Local Government, June 2019

<sup>8</sup> *A Green Future: Our 25 Year Plan to Improve the Environment*, HM Government, January 2018

<sup>9</sup> Green Belt Policy: Landscape Briefing, Landscape Institute, April 2018

## Climate Emergency

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- UK responsibility as a top five historical emitter of greenhouse gas
  - Ontario Greenbelt stores CO2 equivalent of 33 million cars
  - IPCC and CCC reports highlight need for better land management
  - Managing land for carbon provides multiple benefits
  - Three times more carbon stored in soil than in the air
- 

- 2.1 As one of the top five historical emitters of greenhouse gases, the UK has a huge responsibility in stemming the tide of the climate emergency.<sup>10</sup> However, the latest research from the Intergovernmental Panel on Climate Change shows that even at 1.5C there is a high or very high risk of serious impacts, climate-related hazards and limited ability to adapt. Public concern has risen to record levels.<sup>11</sup>
- 2.2 The LMGB already plays a major positive role in mitigating some of the effects of the climate emergency and this role will become more important as the impacts increase. In particular, it encourages the more efficient use of land for development. The LMGB, in common with England's other Green Belts, helps to prevent urban sprawl and focus development in more sustainable locations, in particular suitable brownfield sites within urban areas.
- 2.3 In its most recent report, the Intergovernmental Panel on Climate Change notes that land is a key sink for greenhouse gases.<sup>12</sup> Sustainable land management can contribute to reducing the negative impacts of multiple stressors, including climate change, on ecosystems and societies.
- 2.4 The independent Committee on Climate Change has stated that the UK's 2050 target of net-zero emissions of greenhouse gases requires a major transition in land use and farming practices.<sup>13</sup> The Committee has further noted the importance of land as a critical asset, providing clean water, food, timber and the natural regulation of hazards such as flooding.<sup>14</sup>
- 2.5 Land is also an essential resource to mitigate the climate emergency, sequestering and storing carbon through natural processes. Land needs to be managed more effectively to ensure its essential functions are maintained for future generations. England's land area is restricted, and under significant pressure to accommodate all the demands placed on it, especially loss of land to development, to sea level rise, to an increasing need for flood plains and concurrent demands for more water retention such as through increasing demand for reservoirs.
- 2.6 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 that occurs following increasingly severe rainstorms.
- 2.7 There is a strong international need to protect Green Belt and land that can deliver the resources needed to play a significant role in preventing climate breakdown, for example through carbon sequestration in mature woodland and soils, restoration of ecosystems on agricultural and other land, reduction of food miles, and preventing sprawl on undeveloped land.

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<sup>10</sup> Mark Robinson, APPG oral evidence session, May 2019

<sup>11</sup> 'Public concern over environment reaches record high in UK', Guardian, 5 June 2019

<sup>12</sup> *Climate Change and Land*, IPCC, August 2019

<sup>13</sup> *Net Zero: the UK's Contribution to Stopping Global Warming*, Committee on Climate Change, May 2019

<sup>14</sup> *Land Use: Reducing Emissions and Preparing for Climate Change*, Committee on Climate Change, November 2018

- The LMGB is a huge bank of carbon sequestration. The world's largest single designated area of Green Belt in Ontario stores the CO<sub>2</sub> equivalent of the annual emissions of 33 million cars, or the entire emissions of the state's transport, building, industrial and electricity sector combined.<sup>15</sup>
- It contains some of the types of vegetation that are best at sequestering carbon, such as mature woodland and grassland. There is considerable space to plant more woodland for further sequestration, simultaneously reducing run-off and soil erosion and providing cooling for towns and cities.
- There is three times more carbon in the soil than in the atmosphere and there is a need to protect it from new and unsustainable developments. Capping soil with an impermeable surface, 'soil sealing', prevents its natural functioning. Sealing reduces multiple functions of non-developed land and soil mainly to one: as an inert platform for built development.<sup>16</sup>
- The Committee on Climate Change has concluded that fundamental reform is required to ensure land becomes a more effective carbon store.<sup>17</sup>

2.8 The LMGB also has an important role in climate 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 table.<sup>18</sup>

2.9 There is no overall planning strategy for England; this is a serious omission. A start could be made by a strategy for the LMGB, drawing on plans for Local Nature Recovery Strategies. At present, the governance of LMGB is fragmented with each local planning authority having its own separate planning policy. A comprehensive policy is needed to promote a positive approach to the protection and enhancement of the whole of the LMGB.

2.10 There is no doubt that the LMGB had a positive role in the absorption and sequestration of carbon. However, the continued loss of Green Belt land to development and insufficient attention being given to positive management of the Green Belt erodes the benefits provided to communities in London and surrounding towns for mitigating and adapting to the climate emergency. It increases the likelihood of serious impacts, to which it will be difficult to adapt. It is vital to recognise the role that all land must play in tackling the climate emergency.



<sup>15</sup> *Carbon in the Bank: Ontario's Greenbelt and its Role in Mitigating Climate Change*, David Suzuki Foundation, 2012

<sup>16</sup> *Back to the Land: Rethinking our Approach to Soil*, CPRE, 2018

<sup>17</sup> Mark Robinson, APPG oral evidence session, May 2019

<sup>18</sup> *Ibid.*

## Landscape and Biodiversity

- 55% of LMGB has maintained its traditional rural character
- 24% of LMGB is designated Area of Outstanding Natural Beauty
- Charles Darwin's historic outdoor laboratory is in the LMGB
- 13% of the LMGB is priority habitat, 5% Sites of Special Scientific Interest
- LMGB contains 26,267 ha of Sites of Special Scientific Interest
- 44% of London Wildlife Trust sites are within the LMGB
- 18% of the LMGB is broad and mixed-leaf woodland, considerably more than the national average
- The Natural Capital Committee suggests substantial economic benefits from increasing woodland cover in England

- 3.1 The LMGB is in rude health. Overall, the LMGB scores highly on indicators of landscape quality, natural capital, public recreational and access values (Annex B).
- 3.2 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 from the UK's strongest regional economy, extensive transport infrastructure (including four international airports and the M25) and its proximity to millions of people.<sup>19</sup> The establishment of the LMGB has ensured that valuable areas of green space on London's doorstep have been saved for current and future generations.
- 3.3 A quarter (24%) of the LMGB is designated as Areas of Outstanding Natural Beauty (AONBs). Landscapes of particular value exist in the LMGB outside the AONBs, for example in the countryside surrounding Charles Darwin's home at Downe near Orpington. Londoners can enjoy his 'landscape laboratory' essentially unchanged in character since he studied those landscapes 150 years ago, now just minutes from the southern edge of London. This land is currently on the UK Tentative World Heritage List, and could receive full World Heritage Site status in the future.<sup>20</sup>
- 3.4 Keeping land free from inappropriate development can also help to protect its biodiversity; the LMGB contains a rich diversity of biodiversity habitats. 13% of LMGB land is priority habitat (Annex B) 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 SSSIs, which is 2% of the national total (26,267 hectares are nationally important SSSIs). There are 5,400 ha of local nature reserves, and 44% of London Wildlife Trust sites are within the LMGB. Sites of Importance for Nature Conservation (a local designation) are extensive, covering 39% of the Green Belt within Greater London.<sup>21</sup>
- 3.5 Improved ecology and better connected networks for nature 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 enhancement projects have been implemented within and around the capital.
- 3.6 The Government's 25 Year Environment Plan, and recently published Environment Bill, commits to developing a Nature Recovery Network to complement and connect existing sites, highlighting the

<sup>19</sup> <https://www.ons.gov.uk/economy/grossvalueaddedgva/bulletins/regionalgrossvalueaddedbalanceduk/1998to2016#london-dominates-top-five-nuts3-regions>

<sup>20</sup> <https://whc.unesco.org/en/tentativelists/5672/>

<sup>21</sup> Mathew Frith, APPG oral evidence session, May 2019, <https://www.wildlondon.org.uk/sites/default/files/2019-07/LWT%20Policy%20-%20London%27s%20Green%20Belt%20-%202007%2C%202019%20revision.pdf>

additional benefits of public enjoyment, pollination, carbon capture, water quality improvements and natural flood management. If there is a positive strategy to manage the whole land area, the LMGB is an ideal place to deliver this.<sup>22</sup>

- 3.7 The 25 Year Plan also promotes using our land more sustainably to and creating new habitats for wildlife, to arrest the continuing decline in native species and improve biodiversity.<sup>23</sup> 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, and the LMGB has a role to play in this ambition.
- 3.8 The Plan also 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 an aspiration for 12% cover by 2060.
- 3.9 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 on 8% of England, falling far short of the 17% target advocated by the Committee on Climate Change.<sup>24</sup> The LMGB is likely to have seen a higher proportion of recent new planting compared to other parts of the country, thanks to the achievements of Community Forests at Thames Chase and Watling Chase, which cover about 20,000 hectares. Recent major land acquisitions near St Albans by the Woodland Trust suggest that woodland cover in the LMGB will continue to expand in the future
- 3.10 The third Natural Capital Report notes that there is strong evidence on the economic benefits of increased woodland cover, especially close to towns and cities where it will have greatest recreational value. The Natural Capital Committee concludes that investment in an expansion of England's woodlands could create 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.<sup>25</sup>
- 3.11 Critics of the LMGB, together with some local planning authorities (LPAs) where they have completed Green Belt reviews, make much of examples of land that they claim to be of poor quality. There are also speculators who may deliberately allow Green Belt to become derelict in order to reinforce their case for development.
- 3.12 Green Belts are not designated for their landscape quality. However, the presumption against development within them helps to hold land values down. Therefore, where there is need of enhancement, there is more scope for investment to provide beautiful wildlife rich countryside close to where people live. For example, Walthamstow Wetlands started from a water works. Today it is a nationally recognised wildlife site with footpaths and events that attract local people, providing benefits on the doorstep of thousands of Londoners.

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<sup>22</sup> *A Green Future: Our 25 Year Plan to Improve the Environment*, HM Government, January 2018

<sup>23</sup> State of Nature Report, 2019

<sup>24</sup> Richard Barnes, APPG oral evidence session, June 2019

<sup>25</sup> *The State of Natural Capital: Protecting and improving Natural Capital for Prosperity and Wellbeing*, Natural Capital Committee, January 2015

## Access and Recreation

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- 50% more rights of way per hectare of land in the LMGB than the national average
  - In 2016, 27% of London residents had visited the LMGB in the previous 12 months
  - There are opportunities to improve public access to the LMGB close to where people live, or within easy access by public transport
  - There should be a strong message that the Green Belt is open and accessible to all, both in London and the wider South East
- 

- 4.1 The LMGB plays an important and positive role in providing public access to the countryside. Access to LMGB land is excellent, with nearly 50% more public rights of way per hectare of land than the national average. (Annex D shows public rights of way, National Trails and the National Cycle Network in the LMGB. Annex E shows the distribution of publicly accessible land). Access has been made considerably easier through the continued achievements of the Regional Parks in the Colne and Lee 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 boroughs. Some of these, such as the Bromley Countryside Walks network and the Thames Downs Link from Kingston to Westhumble in Surrey, provide a direct signed route from the urban area to the Green Belt.
- 4.2 Survey work commissioned for CPRE in 2016 showed that there are healthy rates to the Green Belt, with 27% of London residents having visited in the previous 12 months.<sup>26</sup> However, this number could be higher, and compares to 26% in the East of England region, and 34% in the South East region.
- 4.3 Perhaps unsurprisingly, the best concentrations of 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 Upminster, and north of Barnet. These are important areas to improve access options as they are some of the easiest to travel to for those living in central London.
- 4.4 There is a need to promote a positive policy to open up private land in collaboration with landowners together with financial incentives from Government, such as through the new Environmental Land Management Schemes.<sup>27</sup> However, it is not enough just to protect spaces, there is also a need to permit and engage. People are less confident of using country footpaths than they are of going to Hyde Park if they are not sure what they are 'allowed' to do. There is a need to strengthen the message, "You are allowed to go. Please do."<sup>28</sup>
- 4.5 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 or BAME backgrounds are welcome and encouraged to take advantage of the benefits of the countryside. Ensuring the LMGB is accessible through public transport is of particular importance for the many households in London that do not own a car. An umbrella organisation for the LMGB could have a role for advertising the benefits of the LMGB as well as publicising and providing advice on transport and access.

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<sup>26</sup> TNS Omnibus Survey, fieldwork carried out between 24 and 29 September 2016, 883 adults aged over 16

<sup>27</sup> Merrick Denton-Thompson, APPG oral evidence session, June 2019

<sup>28</sup> Prof Jules Pretty, APPG oral evidence session, September 2018

- 4.6 There is often criticism of the proliferation of golf courses and pony paddocks in the LMGB. However, they do demonstrate the real value of a belt of open land to city residents for recreation and sport. There is also some scope to retain these uses and enhance the value of landscape so close to the city. Of interest is that the number of golf courses in the LMGB relative to the size of urban population surrounding it, is (at 0.07 well below the national average (0.13) for number of courses per 1,000 urban residents.<sup>29</sup> 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 LMGB, with one pitch on average per 4,000 residents.
- 4.7 Access to the LMGB is very important for the positive uplift for to health and wellbeing it can provide. There needs to be an overall strategy to ensure that it is open and inclusive for people from all backgrounds, giving encouragement to use and access the Green Belt, combined with a responsible attitude to the Countryside Code.



<sup>29</sup> *Green Belts: A Greener Future*, CPRE and Natural England, 2010

## Health and Wellbeing

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- 80% of people in the UK live in urban areas
  - Green spaces are important to mental health, yet widespread areas across London are classed as deficient in access to public open space
  - In 2014, 19.7% of people the UK aged 16 and older showed symptoms of anxiety or depression with 64.7 million items of antidepressants dispensed in England in 2016
  - The wider costs of mental health problems in the UK are £70-100 billion per year, 4.5% of GDP
  - Open spaces in and around cities have a key role to play in social prescribing and other measures related to public health
- 

- 5.1 Increasing evidence is confirming the importance of a relationship with nature on people's health, especially their mental health. The countryside encapsulates important benefits for health and wellbeing provided by nature and biodiversity. 80% of people in the UK live in urban areas – the need for green nature close to where people live is considerable, and growing.
- 5.2 For the increasing number of people 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 wellbeing, or at least less opportunity to recover from stress”.<sup>30</sup>
- 5.3 The LMGB provides a large expanse of predominantly open, green countryside on the edge of London and the surrounding towns and cities, with 92% classed as undeveloped and a majority (just over 50%) in agricultural use. An agricultural landscape has health and wellbeing benefits purely by virtue of people being able to see it.<sup>31</sup> Moreover, the nearer people are to green space, the greater the benefits – the countryside on our doorstep is the most valuable for local people. The more LMGB boundaries are moved away from the current urban area of London, the greater the challenge and expense to obtain access to it. However, this important evidence appears to have little influence on planners and little effect, so far, on government public health bodies.
- 5.4 Research has shown that:
- When examining the effects of nature and health, natural spaces provide services beneficial for mental and physical health to people of all ages and sections of society. This is true for urban and rural green space, spaces with high and low biodiversity, small and large spaces, gardens and farms. There are no counterfactuals.
  - Neurosciences shows that people benefit from situations of attentiveness or immersion, such as are found in landscape and nature, time spent with friends and other people, or crafts. 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 or fires.<sup>32</sup>
  - Kaplan and Kaplan have shown that engaging with nature replenishes our mental fatigue, helps us recover from stress and restores concentration levels.<sup>33</sup> Through their research they encountered a

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<sup>30</sup> Pretty et al., *The mental and physical health outcomes of green exercise*, 2005.

<sup>31</sup> *UK National Ecosystem Assessment: Synthesis of Key Findings*, UNEP-WCMC, June 2011

<sup>32</sup> Prof Jules Pretty, APPG oral evidence session, September 2018

<sup>33</sup> *The Experience of Nature: A Psychological Perspective*, Rachel Kaplan and Stephen Kaplan, 1989

broad range of individuals for whom green spaces were a salient, 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 wellbeing 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.<sup>34</sup>
- The nation is suffering from a health crisis. A report 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.<sup>35</sup> 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).
- In 2016, the NHS had reportedly prescribed a record number of antidepressants, fuelling an upward trend that has seen the number of pills given to patients more than double over the last decade.<sup>36</sup> Annual data from NHS Digital showed an all-time record (64.7 million items) of antidepressants were dispensed in England in 2016. Also, the number of antidepressants prescribed in London and the Thames Valley area reportedly increased by more than 18% in the three years to March 2017.<sup>37</sup>
- The LMGB has a very important and positive role to play by giving good access to the countryside and nature, likely enabling considerable savings in NHS spending through initiatives such as social prescribing. Defra has estimated 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 that are quoted by those who wish to develop the countryside.

5.5 Research into this important area shows the positive and significant role of providing access to nature and the countryside for individuals, especially children. This supports the important role that the LMGB plays in providing countryside close to the city. The NHS acknowledges the importance of nature and open spaces for health and wellbeing, as set out in figure 1.

5.6 The UK National Ecosystem Assessment concluded that the importance of green spaces for society's health and general wellbeing is not fully appreciated.<sup>38</sup> It supported other research that found access to green space is essential for good mental and physical health, childhood development and social cohesion.

5.7 Further research carried out in the USA shows that an immunoregulatory response to stress develops early in life and is shaped largely by our microbial environment. Professor Lowry, University of Colorado Boulder,

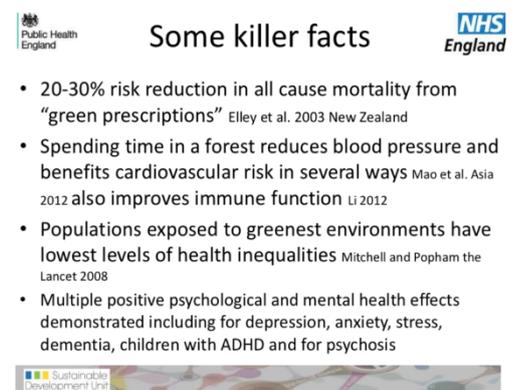


Figure 1: Key facts on the natural environment

<sup>34</sup> <http://www.who.int/sustainable-development/cities/health-risks/urban-green-space/en/>

<sup>35</sup> 'Fundamental Facts About Mental Health', Mental Health Foundation, 2016

<sup>36</sup> 'NHS prescribed record number of antidepressants last year', Guardian, June 2017

<sup>37</sup> 'Why are prescriptions of antidepressants at an all time high?', Evening Standard, August 2017

<sup>38</sup> *The UK National Ecosystem Assessment: Synthesis of Key Findings*, UNEP-WCMC, June 2011

said: "It has already been very well documented that exposure to pets and rural environments during development is beneficial in terms of reducing risks of asthma and allergies later in life."<sup>39</sup>

- 5.8 Research into immunology and the importance of a rural environment 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.<sup>40</sup>
- 5.9 The potential of green areas close to the capital in addressing some of these issues is not currently being fully realised. The London Environment Strategy recognises that access to good quality green space can have a big impact on people's health and quality of life.<sup>41</sup> However, it found that widespread areas across London are classed as deficient in access to public open space.
- 5.10 Drawing on the Government's 25 Year Environment Plan, we note 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 often those who need improved access to the countryside most, have furthest to travel.
  - It is the Government's 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. The recently published Environment Bill also includes a power that Ministers 'may' set out steps to 'improve people's enjoyment of the natural environment' in Environmental Improvement Plans.
  - 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.
  - Government 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, seen in 2019's Year of Green Action. The Government is committed to promoting collaboration between the health and environment sectors at national and local levels.
  - 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, green space managers, environmental bodies and schools encourage people to participate in activities in the countryside.

<sup>39</sup> <https://www.sciencedaily.com/releases/2018/04/180430160419.htm>

<sup>40</sup> Ibid.

<sup>41</sup> *London Environment Strategy*, Mayor of London, May 2018

- The 25 Year Environment Plan 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. There are farms in both urban and rural locations that host groups of schoolchildren 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. This might involve class visits to a farm, a local nature reserve, woodland or National Park. The Landscapes Review led by Julian Glover recommended all schoolchildren should have the opportunity to spend a 'night under the stars' in a designated landscape.<sup>42</sup>
- The 25 Year Environment Plan also welcomes actions by some health professionals who have adopted a practice known as 'green prescribing', a type of social prescribing (also mentioned in the Mayor of London's Environment Strategy) where nature-based interventions are used to treat people with health conditions. Examples of such interventions include gardening, conservation, care farms and green gyms.

- 5.11 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 better access to the countryside, especially that supplied by the LMGB.
- 5.12 Outdoor learning can add value across the National Curriculum, especially for children with sensory or kinaesthetic learning styles or those with behavioural or learning difficulties. A growing number of children's nurseries and schools are offering horticultural or animal husbandry options through initiatives such as Forest Schools or Countryside Classroom.
- 5.13 The protection and enhancement of the LMGB can be a positive and vitally important step in helping the Government to achieve the aims and objectives of the 25 Year Environment Plan. The LMGB is a significant natural resource on the doorstep to Greater London and the several large towns that surround it, and can play an extremely important and positive 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 to do this in the East and South East of England.



<sup>42</sup> Landscapes Review Final Report, Defra, September 2019

## Food and Farming

- 20% of farm holdings in the LMGB are over 100 hectares; 45% are less than 20 hectares
- The UK has large trade deficits for fruit and vegetables, meat and food and drink exports more widely
- An additional nine million meals will be needed per day in London and the South East by 2045
- Agreements between farmers and Natural England to conserve and manage farmland for public access and wildlife covered 51% of all LMGB land in agricultural use in 2009, but this coverage is likely to have declined since 2009

6.1 Agriculture is the single most important land use within the Green Belt, and there is a diversity of types and sizes of land holdings in the LMGB. Although there are a significant number of sizeable holdings (nearly a fifth are larger than 100 hectares), almost half of all holdings are smaller in size (46% are less than 20 hectares).<sup>43</sup>

6.2 Well-managed agricultural land in and around London can play a critical role in meeting London's growing food needs and in retaining the character of a significant proportion of the LMGB. This is mentioned in the Mayor of London's Food Strategy. 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 to meet this demand.

6.3 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 has an overall trade deficit of £22.5 billion in the sector. If the UK wants to become more self-sufficient in food, this will only happen with both high quality farmland and sustainable land management policies. Intensification of production must not come at the expense of the natural environment.

6.4 However, many farmers are under pressure from development, either directly from local developers or as a result of neighbouring development encroaching on their farm businesses or as local authorities sell of farms. 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-

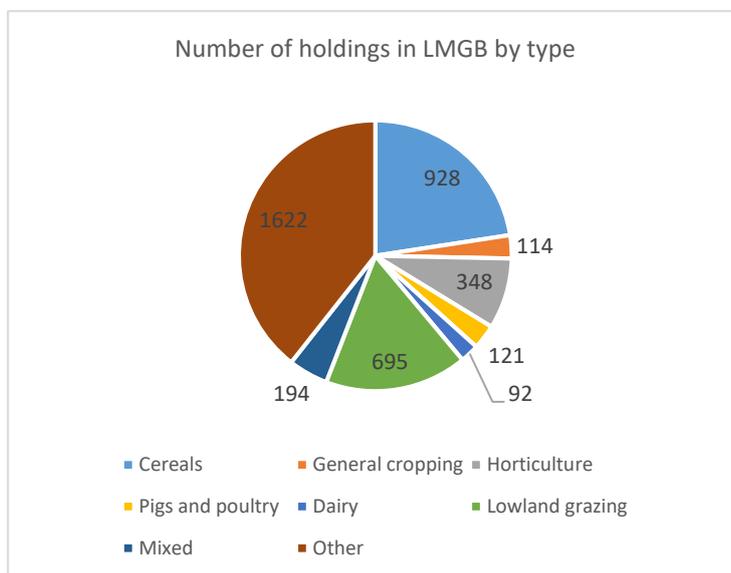


Figure 2: Agricultural holdings in LMGB

<sup>43</sup> Green Belts: A Greener Future, CPRE and Natural England, 2010

farm diversification, but within the LMGB there is likely to be an additional need for diversification proposals to be sensitive to protecting the sense of openness.

- 6.5 Farmers also have the challenge of obtaining planning permission for any development on their land. Local planning policies with regard to farming can vary and this leads to frustration and misunderstanding. An overall policy for the whole of the LMGB would help clarify the situation.
- 6.6 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 sale of produce, primarily for those from more affluent areas who can easily travel to the farms, and most people will continue to rely principally on supermarkets and to a lesser extent on other urban shops to buy their food.
- 6.7 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 or high value products and they are unable to provide a significant retail opportunity for farm produce. Nevertheless, the increasing popularity of farm shops, vegetable boxes and farmers markets demonstrated 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. We were told that there is a significant unmet demand from London restaurants for high quality locally grown produce.<sup>44</sup>
- 6.8 Community farms have a useful role to play within the LMGB, precisely because of their proximity to large peri-urban populations. A 2012 report for the Making Local Food Work consortium found several good practice examples in Green Belts across England, including two in the LMGB.<sup>45</sup> These farms are concerned with engaging their local community in the farm and its produce, including through growing the produce and managing the farm, purchasing vegetable boxes, educating visitors 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 us that it is largely their proximity to London and access to its population that enables them to provide these benefits.
- 6.9 There is evidence of considerable amounts of beekeeping within the LMGB. The ecological and social value of this activity is potentially significant. The importance of beekeeping not only for pollination but as a source of food and medicinal products is increasingly recognised as of great importance to biodiversity.
- 6.10 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 to promote the positive value of farming in the Green Belt. Increasing numbers of farmers understand and engage with 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.
- 6.11 In 2009, agreements between farmers and Natural England to conserve and managed farmland for public access and wildlife (so-called 'agri-environment schemes') covered 51% of all LMGB land in agricultural use. Since 2009, however, landowner participation in the schemes has fallen and this is likely to have led to a reduction in the area of LMGB land covered<sup>46</sup>. Farms within the LMGB are criss-crossed by many miles 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

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<sup>44</sup> Alice Brown, Sutton Community Farm, pers. Comm., February 2019

<sup>45</sup> Food from the Urban Fringe, MLFW, 2012

<sup>46</sup> Pers comm between Natural England and CPRE staff, 2019.

rights of way while maintaining and improving levels of access in order to promote greater safety and a better recreational and educational experience.

- 6.12 The proposed Environmental Land Management Schemes are a new opportunity to pay land managers public money to deliver public goods<sup>47</sup> and to arrest the recent decline in levels of participation by farmers and landowners. These 'public goods' should include the benefits of environmental protection, public access, cultural and natural heritage, climate change mitigation and adaptation, health and welfare of livestock and plant health.



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<sup>47</sup> Richard Hebditch, APPG oral evidence session, June 2019

## A Positive Vision for the Future of London's Green Belt

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7.1 The Government's 25 Year Environment Plan commits to enhancement of the Green Belt to make this important area a 'breathing space' for urban populations to enjoy and for our diverse wildlife to flourish. The fundamental aim of the LMGB is more important now than ever and we want the land within it to be enhanced, promoted and positively protected in perpetuity.

7.2 Our vision is that:

*London's Green Belt provides an important long-term benefit for  
all those living in, around and visiting London;  
its landscape beauty and the haven it provides for an improved and thriving wildlife;  
its significant contribution to the mitigation of the climate emergency and enhancing people's health and  
wellbeing;  
the facilities it offers for outdoor recreation, and its resource for food and farming close to London;  
all this in addition to its traditional role of containing urban sprawl and encouraging regeneration.*

## Recommendations

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8.1 In supporting the delivery of our vision, we recommend the following 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 deliver of:
  - A major increase in 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 public access to the LMGB, for learning, play and social development
  - Provide structural support for sustainable land management in the urban fringe to restore soils and produce nutritious food 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, and act as a test-bed for developing Local Nature Recovery Strategies as proposed in the Environment Bill:
  - 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 local 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, assist in flood prevention and CO2 absorption, and provide opportunities for nature-based therapy
  - Encouraging landowners to enhance 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, the East and the South East
  - Complement and support 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.

8.2 We support the following recommendations of the 2016 CPRE report, *Our Green Belt: Worth Investing In*:

- 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 the LMGB.
- Market the Green Belt as a visitor destination in its own right; the Friends of the Ontario Greenbelt based in Toronto, Canada is already doing this. 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.

8.3 In addition, we also recommend some actions in relation to farming in the LMGB:

- Farmland and sustainable farming activities should continue to be supported, with national and local planning policy that promotes sustainable land management. British produce is high quality, tradeable and produced to world-leading environmental and animal welfare standards. Farming in the LMGB is well placed to serve local markets. As the Government reviews policy in a Food Strategy, 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 promote diversification opportunities and changes to land management practices that will help provide public benefits; including for climate change mitigation and adaptation, leisure and recreation, local food production, opportunities to increase biodiversity, provide education and improve health and wellbeing.

## Annexes

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With grateful thanks to ADAS for annexes B – E.

- A – Pressures on the London Metropolitan Green Belt
- B – Density of Natural Capital and Recreation Opportunities
- C – Distribution of Priority Habitats
- D – Density of Public Rights of Way
- E – Distribution of Publicly Accessible Land

## Annex A – Pressures on the London Metropolitan Green Belt

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- LMGB sites under threat from development have increased from 203 to 519 in the three years to 2018
- Houses proposed have increased from 123,000 to 202,700 in the last three years

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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.<sup>48</sup>

The Government attaches great importance to Green Belts. The National Planning Policy Framework (NPPF) 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, including housing, as inappropriate in the Green Belt, with some specific exceptions such as small affordable housing schemes to meet local needs. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. The NPPF test of 'very special circumstances' will not allow inappropriate development unless the potential harm to the Green Belt is clearly outweighed by other considerations.

A major piece of research and mapping by the London Green Belt Council (LGBC), published in 2016 in the report *Safe Under Us?*, provided strong 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 county groups in Bedfordshire, Berkshire, Buckinghamshire, Essex, Hertfordshire, Kent, Surrey and London; all of which have LMGB within their boundaries.

Since this first report, annual updates have been commissioned by the LGBC. The latest report<sup>49</sup> 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 three years.

Key findings were as follows:

- The number of LMGB sites identified as being under threat from development more than doubled between July 2015 and July 2018, 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.

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<sup>48</sup> 'Green Belts in England – Key Facts', from the report *Green Belts: a greener future*, Natural England and CPRE, published 2010

<sup>49</sup> *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 draft or adopted 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 local authorities in South East Essex.

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, placing the onus of responsibility on local planning authorities while at the same time giving added financial incentives to those same authorities that allow development in the LMGB and sanctions on those that do not.

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 Green Belt as a constraint to development, as set out in the NPPF.

Elected members report<sup>50</sup> 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<sup>51,52</sup>. Only a quarter of the recent housing development within the LMGB has been affordable housing. CPRE research on housing affordability and density provides evidence that homes built in the Green Belt are not helping to solve the housing crisis<sup>53</sup>.

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.

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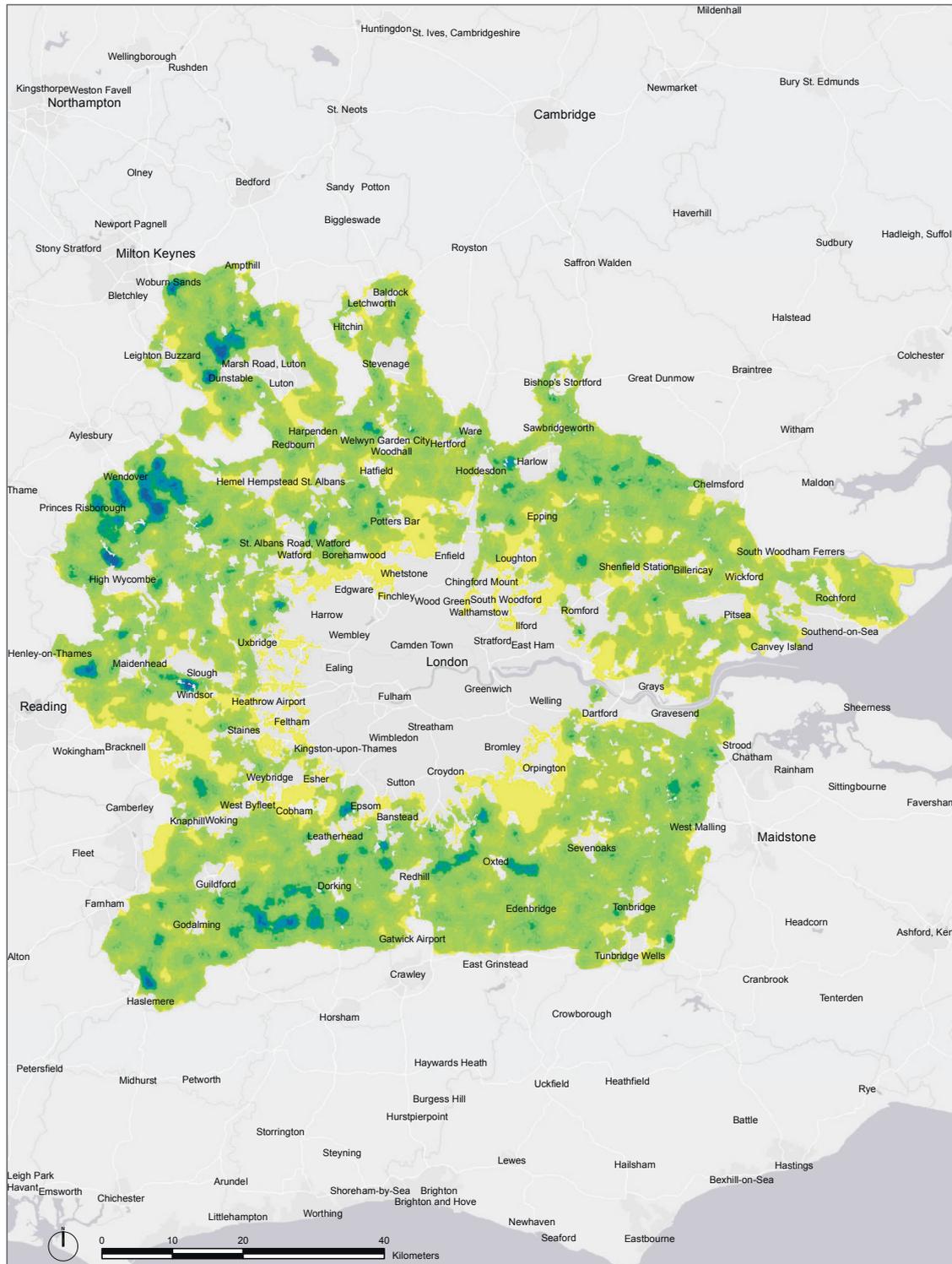
<sup>50</sup> Steve O'Connell, APPG oral evidence session, 1 May 2019

<sup>51</sup> *ibid*

<sup>52</sup> Richard Knox-Johnston, APPG oral evidence session, 1 May 2019

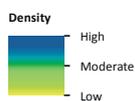
<sup>53</sup> The State of the Green Belt, CPRE, August 2018 <https://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4931-state-of-the-green-belt-2018>

# Annex B – London Metropolitan Green Belt Density of Natural Capital and Recreation Opportunities



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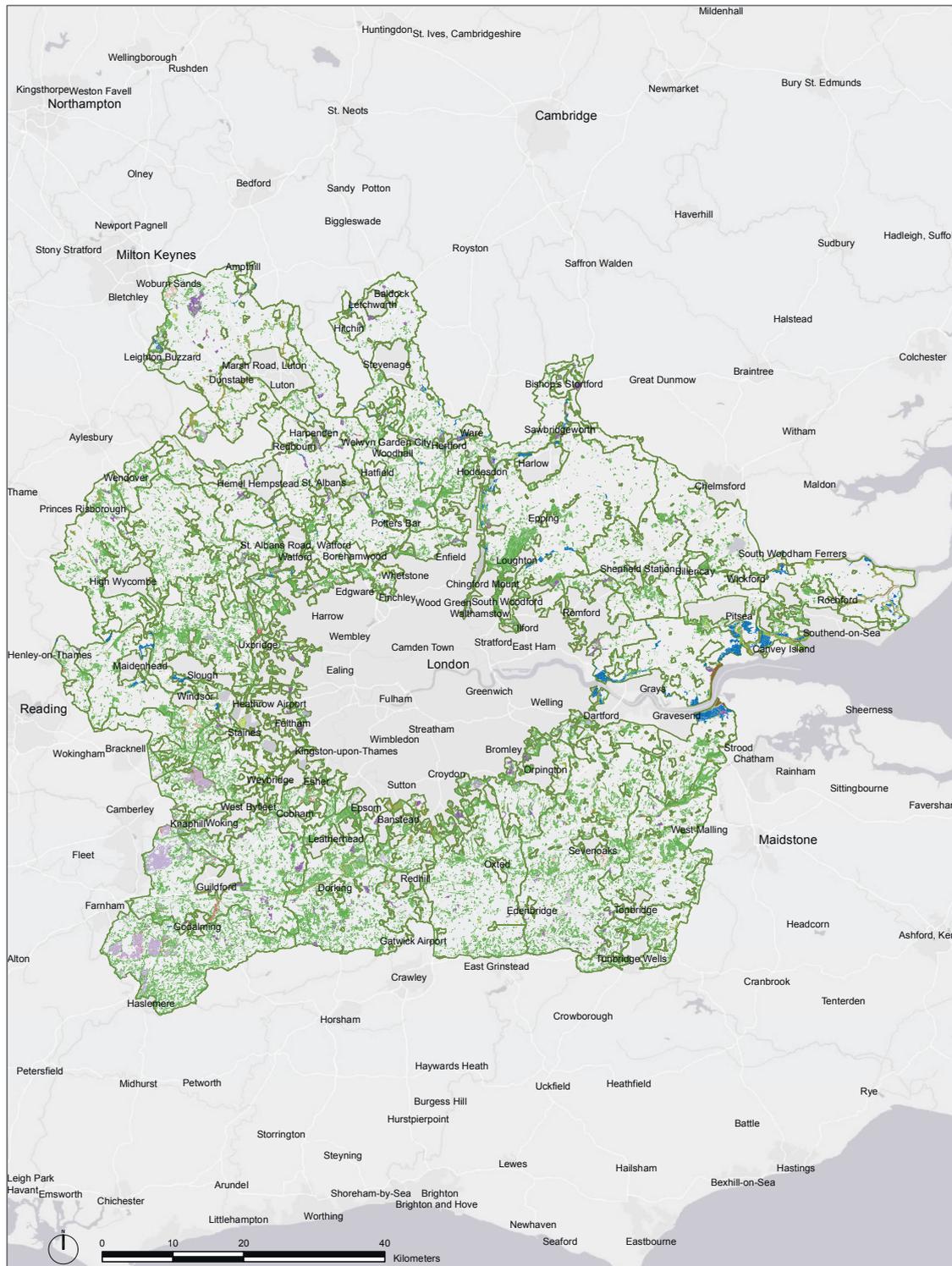
**Key**



ProW data not available

Datasets used: Natural capital: Priority Habitat Inventory (December 2015), Recreation: PROW datasets from Local Authorities/County Councils, National and Regional Cycle Routes from Sustrans (May 2016), publicly accessible land from data.gov.uk (download March 2016), National Trust and Woodland Trust.

# Annex C – London Metropolitan Green Belt Distribution of Priority Habitats



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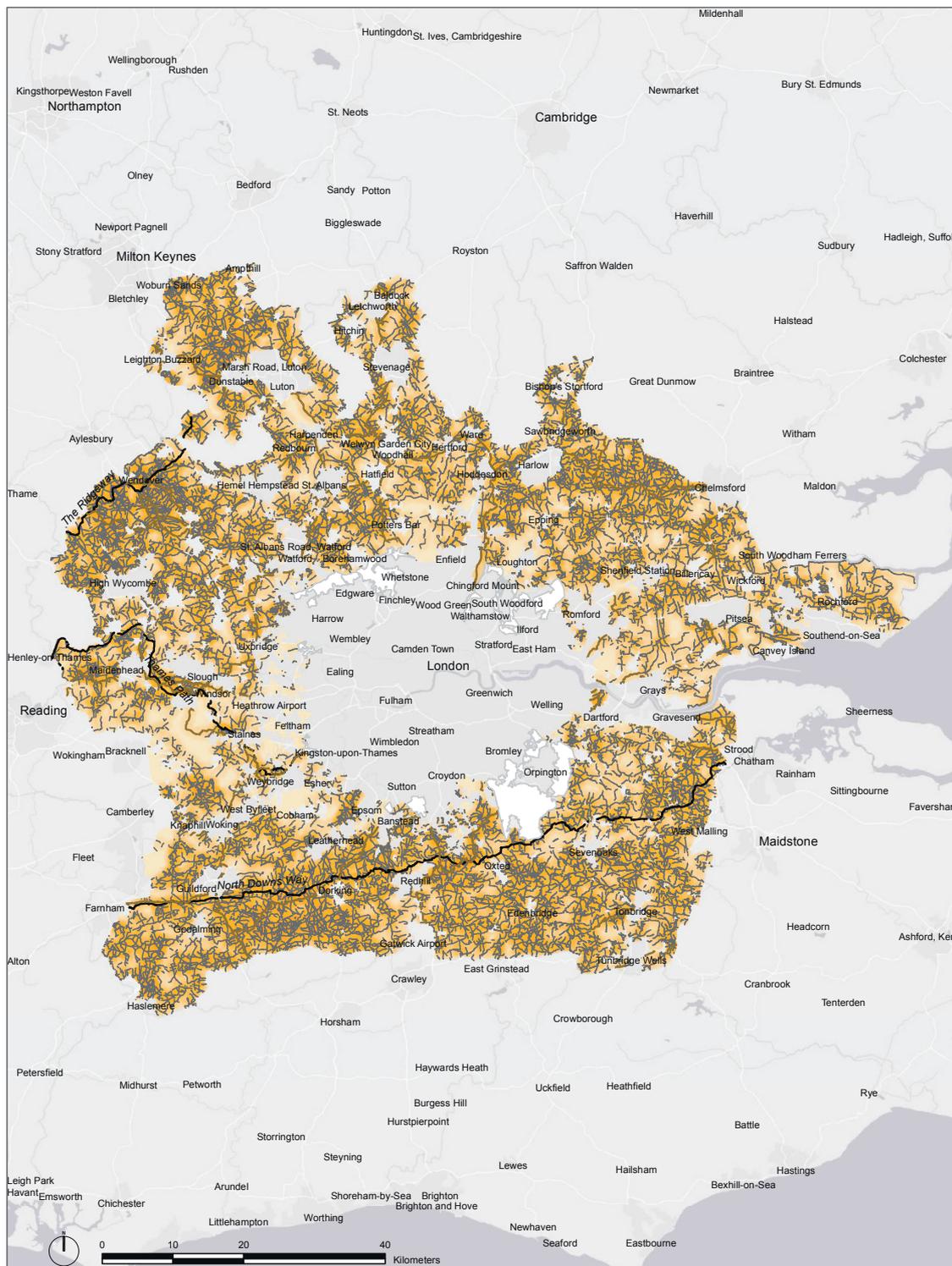
Datasets used: Priority Habitat Inventory  
(December 2015) from data.gov.uk

**Key**

London Metropolitan Green Belt	Lowland calcareous grassland	No main habitat but additional habitats
<b>Priority Habitats Inventory (PHI)</b>	Lowland dry acid grassland	Purple moor grass and rush pastures
Coastal and floodplain grazing marsh	Lowland fens	Reedbeds
Coastal saltmarsh	Lowland heathland	Saline lagoons
Deciduous woodland	Lowland meadows	Traditional orchard
Good quality semi-improved grassland	Mudflats	



# Annex D – London Metropolitan Green Belt Density of Public Rights of Way, National Trails and National Cycle Network



**Key**

- National Cycle Network
- National Trail
- ProW

**Density**

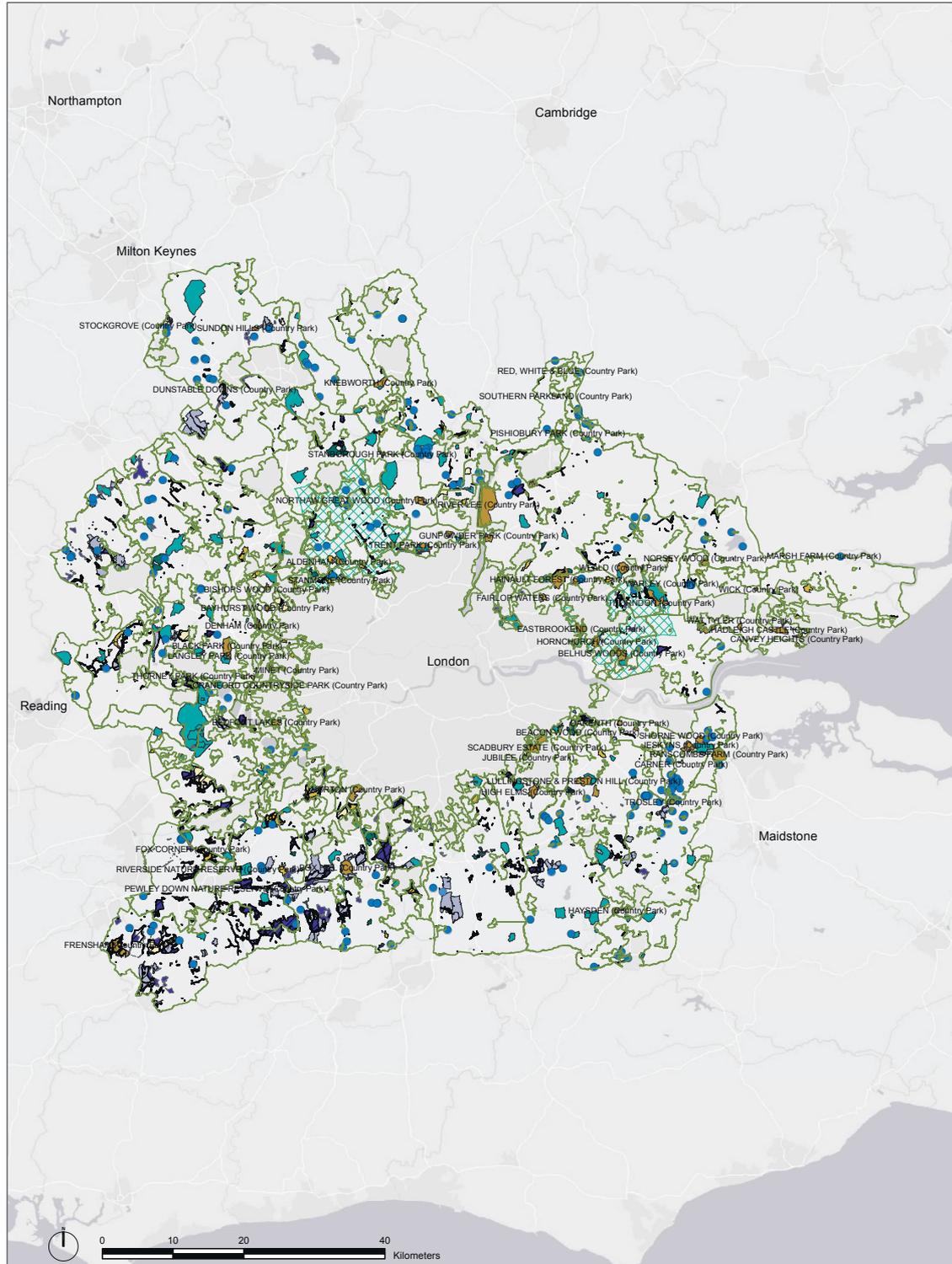
- High
- Moderate
- Low

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Datasets used: PROW datasets from Local Authorities/County Councils, National Cycle Network dataset from Sustrans (May 2016).  
Densities were classified using natural breaks (jenks). Cell size: 10m x 10m.  
Circle neighbourhood: 1000m radius. The length of the Public Rights of Way (ProW),  
National Cycle Routes (NCR), National Cycle Network Links (NRNL) and Regional Cycle Routes (RCR)  
was not taken into consideration to generate the densities.



# Annex E – London Metropolitan Green Belt Distribution of Publicly Accessible Land



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Key

- |                                |                            |                  |
|--------------------------------|----------------------------|------------------|
| London Metropolitan Green Belt | Local Nature Reserve       | Community Forest |
| Millennium Green               | National Nature Reserve    |                  |
| Village Green                  | Open Access Land           |                  |
| Doorstep Green                 | Registered Park and Garden |                  |
| Common Land                    | Woodland Trust Land        |                  |
| Country Park                   |                            |                  |

Datasets used: Publicly accessible land datasets from data.gov.uk (download March 2016), National Trust and Woodland Trust.

