

Written Submission from LSE London (London School of Economics, ID 845) on Matter M65 for consideration in the EiP of the New London Plan, 2019

1. Introduction

Our response to M65, and argument with the New London Plan (NLP) policy G2, follows on from broader points raised in relation to the Plan's general spatial strategy (our submission in M11) with its avoidance of any use of sites within the existing London Green Belt (LGB) to help meet housing delivery targets. As we noted, the NLP position on green belt essentially rests on:

‘a matter of preference, and a judgement about the balance of opinion among Londoners’.

In essence the position of the NLP reflects value judgements that give particular weight to the maintenance of the existing green belt (and potential expansion of it) *relative to other priorities* – notably those of addressing unmet housing need, but also protection of open space used by local communities elsewhere in London.

Here, on the Matter explicitly concerned with policies toward Green Belt, rather than ones that simply excluded real consideration of its potential role in strategic options, we focus on the implications of prioritising Green Belt preservation in this way, and the prices of doing so (in other than housing terms), which the NLP ignores, in relation to the particular kinds of value provided by green belt, both in general and by those with particular stakes in it. A basic argument is that unquestioning maintenance of the Green Belt status quo is not without costs for other Londoners and for other places within London – and we note that in the *corrected* IIA report knowledge about the social/environmental impacts of change in that status quo are recognised to be ‘inconclusive’, though the GLA preference remained simply one of avoiding it¹

2. Policy G2 and the Argument about London's Green Belt

In the rhetoric of the NLP, as well as in much external debate, real issues about Green Belt policy are obscured by their condensation into very broad-brush terms. Thus, Policy G2 (b) states that “The extension of the Green Belt will be supported, where appropriate. Its de-designation will not”. This sets up a crude blanket defence of green belt as a whole, counter posed with a view there is simply no need to draw upon it as a resource for housing, since a combination of brownfield re-use and intensification can accommodate the housing London needs. The practical adequacy of the latter strategies has been challenged in our earlier submissions on M10/M11, M19 and M39. The additional points to be made here are that this is not a black and white choice between two alternatives, but a matter of balance - where issues of preservation/access to open space and environmental sustainability are not simply associated with one side, *and* where there are important (but entirely neglected) aspects of social equity, in terms of which groups win/lose in these terms when Green Belt preservation is given the absolute priority accorded by policy G2.

As the NLP observes, without pursuing its implications, ‘London's Green Belt makes up 22 per cent of London's land area’ (8.2.1). In these simple quantitative terms, the issues are not simply

¹ Rather than potentially having ‘negative environmental effects, since it risks impacting habitats within the green belt and puts natural capital at risk’ as the original IIA report stated, with implied additional health benefits from G2 since protection would ‘provide space for activities such as physical exercise, mindfulness and community events-

ones of de-designating this area either in whole or large part - nor of using it as a direct substitute for available brownfield land within London. Rather, they are of whether:

- all of this very extensive area should be automatically excluded from development because it helps drive efficient re-use of previously developed land (8.2.1); or
- some use of London Green Belt land should be considered as part of wider attempts to secure a sufficient supply of land for housing development over the long run; and whether
- retention of GB status for all of it is actually the best way, in London circumstances, of achieving other intended 'good growth' outcomes of health, environmental sustainability and strong/inclusive communities.

The NLP (and its IIA supporting report) notably fail to address such questions, or offer clarity on the benefits associated with preservation of (various parts of it) and how these weigh against the opportunity costs elsewhere in the city, and for Londoners generally, of prioritising any/all Green Belt land. Ideas about what the main benefits might be have change over time. When the LCC first discussed it, the purpose was to give Londoners access to open space. This remains a public expectation, even though urban containment has become the official priority, preventing development but not assuring access (now available on around one sixth of the LGB)². In recent decades these kinds of benefit have been complemented by notions that building on LGB land is unnecessary so long as development 'capacity' is available on brownfield sites – and that protecting the former will speed up development of the latter.

In our earlier submissions (on M11, M19 and M39) we have shown both these notions as resting on false premises. These, and the whole question of how Green Belts (inside and outside London) impacts on housing supply will not be repeated here. Instead we will focus on relevance of the social and environmental aspects, particularly how they vary between areas, types of green site – and in their impact on different groups of more/less privileged Londoners.

3. The Opportunity and Equalities costs of Maintaining the London Green Belt Unchanged

Leaving the current area of green belt within London untouched and relying exclusively on brownfield land and intensification to meet housing need has consequences, not only (negatively) for the chances of succeeding in that aim, but also (with mixed effects) for quality of life, access to space and local environmental sustainability. These will vary across both areas and communities in London, with more positive effects close to the protected areas than for places/groups where pressure is transferred to.

Crucially, in relation to goals of delivering good growth for all Londoners this uneven geography also implies socially uneven effects, because of the correlation between:

- the uneven spatial distribution across London of green belt on the one hand (within certain parts of outer London), and of valued open space in intensification zones on the other; and

² Estimates range between 13% and 22% [<https://barneystinger.wordpress.com/2015/02/25/the-green-belt-a-place-for-londoners/>]

- the residential distribution of the city's generally more/less socially advantaged groups – including legally protected groups who are particularly likely to live in areas where intensification squeezes access to open space.

There are opportunity costs to protecting green belt which have implications for equality as well as for the overall greenness of London and Londoners' lives, and can involve legally significant discrimination too. This inequality is further exaggerated by conservation areas that also limit where intensification can happen and have a broad geography associated with more privileged local populations. And by the fact that access to green belt is easiest for people with larger properties who often also enjoy better opportunities to access parks with a lot of open space. These implications should at least be addressed openly within the NLP – and in impact assessments of it – together with ways of mitigating it.

4. Relating Green Belt to Other Types of Open Space in London

If, as social attitudes surveys suggest, public support for Green Belt is much more related to a 'green' concerns than to its 'belt' role a more functional and differentiated approach to green (and other) open spaces in London and their uses (by people and nature) would be much more appropriate than the NLP's practice of lumping them together at the level of argument (e.g. 2.02) – in defence of LGB which happens to be much the largest of them. Others serving particular functions more effectively deserve a priority that they don't get within a policy that (unrealistically) purports to provide full protection for all.

The early purpose of providing access to green open space for those living at higher density is better served by MOL which in general sits within Inner London. Given this and that there is much less MOL it would make sense to give particular strength/weight to policies protecting it. In practice the reverse seems to be the case with substantially greater losses reported from MOL than Green Belt, and very much more from local open space³. In practice there are trade-offs between them which need facing up to explicitly, in the policy statements and supporting text, including addressing likely losses of types of 'local' open space.

An important example is allotments, which have provided land to Londoners without gardens to grow food. Shortage of land for housing has placed these under pressure, recognised in a 2006 GLA report on London's disappearing allotments, though promised monitoring seems not to have been continued beyond 2007, and London's longest-surviving allotment space still faced threats of development for housing in 2017. The NLP favours growing more food in London, recommending protection for allotments as well as use of between-spaces. But where green belt is effectively defended, experience suggests this is at the cost of MOL, allotments and other open spaces – a plus greater intensification. This will have particular spatial characteristics and, again, we need better information regarding the groups to which the benefits accrue and on which the costs fall.

Considered in a more sophisticated way, green belt could be appraised for its contribution in supporting other open spaces; for example, by highlighting where opening access to green belt could contribute to the creation of a green corridor when combined with, say, MOL. A more careful appraisal of green belt on a case by case basis could in a similar way help contribute to understanding possible contributions to initiatives such as *London National Park City* while identifying other sites that make little contribution and where housing and other development might be appropriate alongside the robust protection of green belt that is making the most positive contribution and imposing the least cost.

³ The latest London Plan Annual Monitoring Report shows that in 2016/7 5% of lost protected open space came from green belt, 12% from Metropolitan Open Land and 83% (1666 ha.) from other 'local' open spaces.

5. Conclusion

The original draft of NLP offered potential protection against urban heat islands (UHIs) as part of the case for a blanket defence of the LGB, even though this was completely unsupported by the GLA's own guidance for decision-makers on how UHI effects could be reduced (e.g. by avoiding areas of over-concentrated development). The minor revisions dropped that claim in favour of a much fuzzier (but still unsupported) claim about 'climate resilience'. But we see this episode as yet another example of a familiar 'shifting of goal posts' in defences of the LGB, by both obfuscating and changing the justifications for it.

In place of such generalised claims-making - and the conflation of green belt/spaces - what we need (now especially) is openness and clarity about:

- what the green belt is; what it effectively does/doesn't do in different situations;
- what 'London' and Londoners want of protected green spaces in the city; and then,
- how far and in what form the LGB is the best means to achieve these goals

The NLP falls short particularly in failing to clearly explain: the opportunity costs as well as the benefits of a blanket preservation of the inherited LGB; and the uneven distribution of these benefits across communities, which clearly do not experience the same balance of gains and sacrifices.

In its present form policy G2 is unacceptable because of the arbitrarily political way in which (as argued in M1 and M11) spatial development strategies involving LGB reform were excluded from consideration as a contributor to reducing the housing delivery gap. If that were put to the side, the purely social/environmental issues addressed in this submission need to be dealt with in a much more differentiated and explicit way. This would include acknowledging that as amounts of MOL, green belt and local open space are lost each year some weighing should take place of when and where this loss is to take place. We note that green belt review sits with the boroughs. However, as argued in our response to M11, this does not, and should not, curtail a leadership role for the mayor in coordinating boroughs' reviews of green belt and of green infrastructure more widely.