

M65. Would Policies G2 and G3 provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the policies and detailed criteria justified and necessary and would they provide an effective basis for development management?

- 65.1 Yes, the Policies and accompanying detailed criteria provide an effective strategic framework for local plans and neighbourhood plans to follow, as well as providing a clear policy basis for development management decisions. Policies G2 and G3, alongside other policies in Chapter 8 of the draft Plan, will be key to protecting and enhancing London's open spaces, thereby supporting the delivery of GG2.
- 65.2 The Green Belt and Metropolitan Open Land (MOL) perform several beneficial strategic functions for London, including combating the urban heat island effect, growing food, providing habitats for biodiversity and providing space for sport and recreation, as well as limiting the further expansion of built development. It is necessary for the London Plan to include policies to protect and enhance these important functions and to ensure development is directed to sustainable locations, making the best use of previously-developed land. Green Belt and MOL designations often span borough boundaries, and as such it is important that the London Plan provides a clear policy framework to ensure a consistent strategic approach to Green Belt and MOL across London.
- 65.3 Policy G2 A sets out how the Mayor intends to protect London's Green Belt from inappropriate development and support appropriate multi-functional uses through the development management process, ensuring that the openness and permanence of the Green Belt is preserved. G2, Part B, also provides clear direction in relation to green belt boundaries for development plans.
- 65.4 Policy G3 sets out how MOL should be designated and protected and includes criteria outlining the characteristics and functions of land that should be designated as MOL through development plans. In addition, G3 A provides clear direction in relation to development proposals.

In particular:

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

- 65.5 Yes, as set out in paragraphs 18 to 23 of the Mayor's answer to Preliminary questions 5 & 6¹, Policy G2 is consistent with national policy.
- 65.6 Policy G2 provides a clear approach to the protection and enhancement of London's Green Belt, reflecting the NPPF regarding protecting the Green Belt from proposals that would cause harm, and enhancing it through provision of appropriate uses.
- 65.7 The 2012 NPPF refers to Green Belt boundaries being altered only in exceptional circumstances and highlights the need to take account of sustainable patterns of development, including considering the consequences for sustainability of channelling development towards urban areas (paragraph 84). This is consistent with the spatial

¹ NLP/EX/03: Mayor of London, The Mayor's responses to the Panel's Preliminary Questions, September 2018

strategy set out in the draft Plan, which is focused on sustainable intensification of urban areas.

- 65.8 The NPPF is clear that local plans should give strong protection to the Green Belt, outlining that Green Belt protection is a reason to restrict development even in the context of meeting objectively-assessed needs.² Policy G2B is clear that de-designation is not supported. The policy wording has a different emphasis to the NPPF, with the NPPF requiring the demonstration of exceptional circumstances to justify boundary changes. The emphasis in the draft London Plan is considered justified as Green Belt release is not considered necessary, with the vast majority of London's development needs being able to be met within London, without developing on the Green Belt. The NPPF is referenced in the supported text (paragraph 8.2.1) regarding the processes and considerations for defining Green Belt boundaries.
- 65.9 A letter received in 2015 from Brandon Lewis, the then Housing and Planning Minister, in response to the Inspectors' report to the 2015 Further Alterations of the London Plan provides further insight into the intention behind of the Government's approach.³ Mr Lewis clearly highlighted that in considering options to accommodate growth, the Green Belt should be given the highest protection in the planning system. This is consistent with the approach now being taken in draft Plan Policy G2B.
- 65.10 The 2018 NPPF states that before justifying changes to Green Belt boundaries, strategic policy making authorities should be able to demonstrate that they have fully examined all other reasonable alternatives for meeting identified need – this includes making best use of brownfield sites and underutilised land and optimising densities and should be informed by discussions with neighbouring authorities.⁴ This is consistent with the approach taken in the draft Plan, which prioritises brownfield development and seeks to optimise densities and make the most efficient use of land.
- b) Is the 'swapping' of Metropolitan Open Land (MOL) referred to in paragraph 8.3.2 and allowed for by Policy G3 AC justified? Do the other detailed criteria provide sufficient clarity about inappropriate development and how any boundary alterations should proceed? Should parts of the River Thames be designated as MOL?**
- 65.11 Given the importance of MOL to Londoners, the Mayor considers that MOL should have the highest levels of protection, in line with that of Green Belt land. The 2012 NPPF provides details on what is inappropriate development⁵ and as such it is not considered necessary to repeat this in the London Plan. However, to provide further clarity and to ensure that the same policy considerations are applied to MOL, an amendment is proposed to 8.3.2 as outlined in Appendix 1 of this statement. This includes a Further Suggested Change to remove reference to land swaps from paragraph 8.3.2 of the supporting text.
- 65.12 Proposed Minor Suggested Changes, in particular those to Policy G3 AC, clarify how any changes to MOL boundaries should be assessed. The additional text ensures that any change to boundaries does not result in a loss of overall area or quality of MOL,

² NLP/GD/03: DCLG, NPPF March 2012, Paragraph 14; MHCLG: NPPF 2018, paragraph 11.

³ NLP/MS/02: DCLG, Further Alterations to the London Plan letter from Minister of State for Housing and Planning, January 2015

⁴ MHCLG, NPPF 2018, paragraph 137

⁵ NLP/GD/03: DCLG, NPPF 2012, Paragraphs 87 to 91

making reference to the list of criteria for designation of MOL. This provides an effective framework for boroughs to approach the designation and protection of MOL. Any proposed revision of MOL boundaries will need to be justified and assessed as part of the borough local plan process.

Designating parts of the Thames as MOL

- 65.13 It is generally not considered appropriate to designate parts of the River Thames as MOL, as different policies and considerations should apply to reflect the different forms, characteristics and functions of these spaces. It is recognised that some existing MOL designations have been applied by boroughs to parts of the River Thames in west London. However further MOL designations for the River Thames are not considered appropriate; as this would not fully reflect its multifunctional nature and the aims of policies SI15 and SI16 which seek to promote the waterways for transport and a range of other uses.
- 65.14 The River Thames is protected by Policies SI14 and SI17 and G6 of the draft Plan. Boroughs are encouraged to designate Thames Policy Areas that recognise the distinctiveness of different stretches of the river and to participate in updates to Thames Strategies to identify and promote areas of special character of the Thames to support local plan policies.
- 65.15 The Mayor does not seek to direct de-designation of those areas of the Thames with existing MOL designations and Minor Suggested Changes have been proposed to paragraph 9.14.8 to clarify this.

Appendix 1: M65 Further suggested changes

The Mayor is suggesting the following further changes to Policy G3 supporting text:
 The Mayor is suggesting the following further changes to the supporting text of Policy SI2:

- **Blue** – new text
- ~~Blue~~ – new deleted text

Change ref no	Policy/para /table/map	Further suggested change
M65.1	paragraph 8.3.2:	<p>“The principles of national Green Belt policy also apply to MOL. Metropolitan Open Land is afforded the same status and protection as Green Belt land. Any proposed changes to MOL boundaries which result in loss must be accompanied by thorough evidence which demonstrates that there are exceptional circumstances, as set out in the NPPF. The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy.”</p>