LONDON's 'PROTECTED' LAND: the extent, location and character of designated Green Belt and Metropolitan Open Land in Greater London
CPRE London, August, 2018
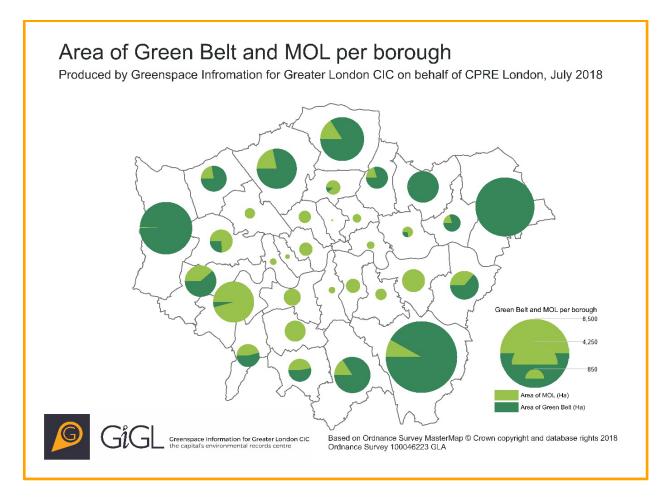
Summary

1.   Designated Green Belt and Metropolitan Open Land provides a vital green resource for London. This land has the highest level of protection in planning policy - hence our use of the term 'protected land' - and yet, as previous research by the London Branch of the Campaign to Protect Rural England (CPRE London) has shown, it is increasingly under pressure for built development.

2.   In order to understand better its location, extent and character, CPRE London has worked with Greenspace Information for Greater London CIC (GiGL) – the capital's local environmental records centre – to gather comprehensive data on Metropolitan Open Land and Green Belt designations across all of London's local planning authorities, the borough councils. This report summarises the findings of this project which builds upon GiGL's existing datasets and CPRE London's knowledge of current threats.

3.   The resulting comprehensive datasets should be a trusted tool that will assist a range of organisations, particularly local authorities, in making effective policy choices based on sound evidence. It should assist the development of policies that contribute significantly to quality of life of Londoners and empower local communities to feel a stronger sense of ownership of the green open spaces and the natural world that surrounds them.

4.   The primary outputs of the project have been the compilation of accurate, up-to-date datasets (as of February 2018) for designated Metropolitan Open Land and Green Belt for each London borough covering the whole of the Greater London area. These will be curated in future as spatial datasets by GiGL. The following data visualisation captures the headline findings of the survey. Overall, GiGL established that within Greater London, 35,109 hectares of land, just over 22%, is designated as Green Belt and 15,681 hectares, almost 10%, is designated as Metropolitan Open Land. Almost half of the area of Green Belt and Metropolitan Open Land is recognised as important for nature conservation and over 97% of London's ancient woodland is covered by these designations. Detailed data covering the extent, location and character of this land by borough are contained in the data visualisations and tables in this report.

Area of Green Belt and MOL per borough
Produced by Greenspace Infromation for Greater London CIC on behalf of CPRE London, July 2018

Green Belt and MOL per borough
8,500
4,250
850

Area of MOL (Ha)
Area of Green Belt (Ha)

GiGL
Greenspace Information for Greater London CIC
the capital's environmental records centre

Based on Ordnance Survey MasterMap © Crown copyright and database rights 2018
Ordnance Survey 100046223 GLA

5.   CPRE London intends to promote the use of this dataset as the basis for an annual report to monitor changes to the extent and character of Green Belt and Metropolitan Open Land within the Greater London area. The report also includes recommendations by CPRE London aimed at encouraging more effective protection of Green Belt and Metropolitan Open Land from development, through improvements to national and local planning policies and practice, including in the new London Plan.

Background

6.   London's Green Belt and Metropolitan Open Land designations have been among the most successful aspects of the post-war planning framework. With their core purpose of preventing urban sprawl, these protections have for many years been an effective constraint on uncontrolled urban development. These designations also play a critical role in encouraging regeneration and the better use of existing developed land. At the same time they have provided opportunities for Londoners to access green spaces and enjoy the benefits they offer in terms of health and wellbeing.

7.   Much of the open space that Londoners currently enjoy owes its existence to the activities of the London County Council (LCC) established in 1888, and its predecessor, the Metropolitan Board of Works, which saved thousands of acres of parks, squares and common land as public open space. The Greater London Regional Planning Committee first considered the need for a 'green girdle' around London to restrict urban sprawl and safeguard land for recreation in 1927. In 1931 the Municipal Reform Scheme proposed

a Green Belt ring of open space which led to the LCC contributing to the purchase and preservation of open space by local authorities around the capital. The Green Belt (London and Home Counties) Act 1938 strengthened the powers of local authorities and parish councils to acquire land and impose restrictive covenants on users.

8.   The concept of Metropolitan Open Land (MOL) is more recent than that of Green Belt but it has a similar status in planning terms. In 1969 the draft Greater London Development Plan (GDLP) was published by the Greater London Council (GLC) which succeeded the LCC in 1963. MOL was introduced in the GLDP, which was finally approved in 1976, as a protective designation for strategically important open land within the urban area which helped shape development and distinctive communities and provided recreational opportunities. It was recommended that parks, woodlands, golf courses, nursery gardens, cemeteries and other open land which might otherwise be at risk of development should receive this designation. In 1989 the Government accepted that the same presumption against development in the Green Belt should apply to MOL as well.

9.   Together, Green Belt and MOL are key elements of a regional 'park system' of open spaces described in the 1943 County of London Plan. The Plan identified a need for open spaces to be coordinated and stated that 'the Green Belt and surrounding countryside need bringing more into the centre through green wedges formed by the existing undeveloped and public land, the parkways along ring roads giving access from one wedge to the other'. It also recognised the importance of providing smaller open spaces 'at the other end of the scale' where 'the space around and between buildings needs planning in relation to the larger open spaces in the area, so that there is interpenetration of greenery from the parks into the residential areas, and it becomes possible for the town dweller to get from doorstep to open country through an easy flow of open space from garden to park, park to parkway, from parkway to green wedge and from green wedge to Green Belt.' This vision is even more important for the quality of life of all those who live in and visit London today than it was over 75 years ago.

Green Belt

10.   London's Green Belt (or the Metropolitan Green Belt) is intended to be a permanent area of open land that surrounds the city. It is one of 14 Green Belts across England that in 2017 covered a total of 1,634,700 hectares or 13% of England's total land area (source: MHCLG, Green Belt Statistics for England, March 2017). While most of London's Green Belt lies beyond the borders of Greater London in surrounding counties, 7% of the total (514,030 hectares) (source: MHCLG, 2017) is located within Greater London accounting for 22% of London's land area. The Metropolitan Green Belt predates the creation of Green Belt in other parts of England which were promoted in a Government Circular issued in 1955.

11.   The five purposes of the Green Belt set out in national planning policy are:

- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into one another

- to assist in safeguarding the countryside from encroachment
- to preserve the setting and special character of historic towns
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

12.   The Mayor of London has generally taken a strict approach to protecting the Green Belt within London which we welcome. We expect this to continue. The new draft London Plan published for consultation in December 2017 states that the Mayor 'strongly supports the continued protection of London's Green Belt' and, going further, contains a policy which indicates that the 'de-designation' of Green Belt will not be supported. The Mayor has the power to direct refusal of development proposals on Green Belt or MOL.

Metropolitan Open Land

13.   Metropolitan Open Land (MOL) is a designation unique to Greater London. Its purpose is to protect strategically important open spaces of London-wide significance within the built environment. These are spaces that contribute to the capital's green character, provide recreation facilities for Londoners and often preserve landscapes of historic or biodiversity value. In practice, MOL has been afforded a level of protection equivalent to Green Belt land since it became a category of protected land in its own right through the GLDP.

14.   The new draft London Plan indicates that MOL should meet at least one of the following criteria:

- it contributes to the physical structure of London by being clearly distinguishable from the built up area
- It includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- It contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
- It forms part of a strategic corridor, node or link in the network of green infrastructure and meets one of the above criteria.

15.   The draft Plan contains policies to protect MOL from 'inappropriate development' but there is a risk these will be undermined by the proposal to allow the principle of 'land swaps' to be applied to MOL. This would effectively mean that built development could be permitted on protected MOL provided exceptional circumstances are demonstrated and new land is provided which meets 'at least one' of the MOL criteria outlined above. We are pleased that recent suggested changes to the draft Plan by the Mayor seek to address this issue (Mayor of London, August 2018).

Growing pressures

16.   There is growing pressure on local authorities to find land for development primarily to meet the need for new housing. According to current projections, an

average of 210,000 new households will form in England in each year between 2014 and 2039 (MHCLG, 2016, Housing Statistical Release). In 2016/17, the total housing stock in England increased by around 217,000 residential dwellings: 15% higher than the previous year's increase, but still short of the estimated 240-250,000 new homes needed to keep pace with household formation. This is a problem felt most acutely in London where the crisis of affordable housing supply is particularly severe.

17.   The impact of this pressure for new housing is apparent from official land use change statistics. Data published by the Ministry for Housing, Communities & Local Government (MHCLG) in September 2017 show that the total extent of designated Green Belt in England as a whole has shrunk by around 4,800 hectares between 2010/11 and 2016/17. In 2016/17 alone, eight local authorities across England (none of them in London) adopted new local development plans that released formerly protected open space for development, resulting in an overall decrease of 790 hectares in the area of Green Belt in England between 31 March 2016 and 31 March 2017.

18.   Research published by CPRE London in 2016 revealed a significant increase in the number of planning permissions for development on Green Belt and MOL within London between 2004 and 2014. This resulted in the loss of over 100ha of protected land during that period. There are worrying signs that this trend is continuing with evidence in a recent report by the London Green Belt Council that the development threats to the Metropolitan Green Belt, including in local authorities outside Greater London, more than doubled between July 2016 and July 2017. Data collected by the Greater London Authority (GLA) also reveal a continued loss of open space with almost 30 hectares of predominantly Green Belt and MOL lost to development in just one year 2014/15, and a further 14 hectares in 2015/16 (source: GLA, London Plan Annual Monitoring Report, 2015/16). More recently, a national report on the State of the Green Belt by CPRE reveals that there has been a 62% increase in the loss of Green Belt land across the country since 2013 (CPRE, August 2018).

19.   In a wide-ranging Housing White Paper, *Fixing our broken housing market*, published in February 2017, the Government put forward a set of proposals to allow new homes to be built at a quicker pace than at present. This included a new standard methodology for calculating 'objectively assessed need' and giving councils and developers tools to develop permissioned land more swiftly. While the White Paper did not explicitly signal a weakening of Green Belt protection as had been feared, it does contain a number of proposals that could in practice undermine the protection Green Belt is afforded in national planning policy.

20.   The effect of a new 'exceptional circumstances' test, introduced in the revised National Planning Policy Framework (NPPF) published by the Government in July 2018, also remains to be seen. This test is intended to allow Green Belt boundaries to be altered only where local authorities have demonstrated they have considered brownfield sites, increased densities and other options with neighbouring authorities for meeting their identified development requirements. While greater clarity is broadly welcome, the robustness of these safeguards depends on effective implementation by local authorities.

21.   Concerns over the future protection of Green Belt and MOL within London have arisen recently as a result of policies proposed in the new draft London Plan and the Government's initial response to the draft Plan. As mentioned above, the application of the principle of 'land swaps' to MOL land as outlined in paragraph 8.3.2 of the draft Plan could lead to the overall loss of such land unless it is accepted that 'land swaps' should only be possible in wholly exceptional circumstances and where resulting MOL land is of the same or greater quantity and quality. Moreover, there are fears that a letter in July from the Communities Secretary, Rt Hon James Brokenshire MP, to the Mayor of London about the draft Plan which argues for an increase in housing provision could add further pressure to build on the Green Belt (MHCLG, July 2018).

The need for better data

22.   Against this backdrop of growing pressures and new uncertainties arising from recent changes to national planning policy, it is more important than ever to have easy access to up-to-date and accurate Green Belt and MOL data. Despite their strategic significance, reliable datasets capturing the full extent of Green Belt and MOL across Greater London have not always been widely accessible. Moreover, the data that exist have not always accurately reflected realities on the ground. The lack of comprehensive and reliable city-wide data is a clear obstacle to policy-makers and community organisations in addressing the problems posed by unsustainable urban development and seeking to identify protected open areas most at risk. We need to equip policy-makers and others operating on a London-wide scale with a trusted set of data that can help inform approaches to this issue and target action where required.

23.   With more regular reporting, and management by GiGL, it is hoped that local authorities will be able to provide datasets which better track any material changes to the boundaries of Green Belt and MOL. One of the primary outputs of this project is the establishment of a full baseline dataset across all of London's planning authorities against which any future changes to Green Belt and MOL can be more closely monitored.

24.   Having comprehensive data on the full extent of Green Belt and MOL land across London's boroughs will be an important tool in holding national Government and local authorities to account in honouring their public commitments to protect some of our most precious open spaces.

Methodology

25.   CPRE London has worked closely with experts from GiGL in compiling the data for this report. GiGL is the capital's environmental records centre which collates, manages and maintains detailed datasets on the city's wildlife, habitats and open spaces, and access to these datasets is provided via a suite of services tailored to the end users' requirements. Local environmental records centres, such as GiGL, working in partnership with the local authorities, are the ideal organisations to manage regional datasets such as those of designated MOL and Green Belt land.

26.   GiGL already held MOL and Green Belt data for most of Greater London. The GiGL partnership MOL and Green Belt data are available in accordance with their

access to data policy, as GIS data in standard British National Grid format. Unfortunately, due to a lack of previous engagement by some local authorities, the dataset was not fully comprehensive, with data on MOL lacking for some London Boroughs. Comprehensive Green Belt data were available, as a combination of data GiGL had received from the boroughs themselves and data freely available from the MHCLG. CPRE London assisted GiGL in its annual call for new data, in order to secure the information underpinning this report. The Greater London Authority (GLA), which has also gathered data on these two designations, provided additional support.

27.   The project commenced with a thorough analysis by GiGL and CPRE London of the existing available data; comparing GiGL's data with the GLA's and with published designated land maps from the local authorities. There was considerable variation between the data from these three sources in some localities.

28.   The availability and clarity of designated sites data varies widely between boroughs. All boroughs have a policies map, or similar, published on their website, but these differed in their intelligibility and usability. Whilst some are instantly intuitive, others were found to be inscrutable or broken. A common issue was when several policies applied to the same sites and boroughs had shown them all on the same low-resolution document, so that it was difficult to visually unpick the extent of each designation. For a small number of boroughs known to have Green Belt and/or MOL, it was not possible to determine its location from their published maps. One borough (Lambeth) had published a GIS dataset of their MOL as open data on their website, but this was a notable exception.

29.   These findings underscored the need for a single, up-to-date and accurate regional dataset to show the boundaries of sites that have been formally designated as MOL and Green Belt. Consequently, each planning authority in Greater London was contacted in November 2017 with a tailored email. This included the 32 London Boroughs and the London Legacy Development Corporation (LLDC) but not the City of London because they were known to have no designated MOL or Green Belt. If the data GiGL currently held were found to match the most recent policy maps and the GLA's data, local authorities were asked to confirm whether the data were still current. If the analyses had revealed differences between the datasets, authorities were asked if they could confirm which dataset was correct and why, and asked to provide new data where applicable. New data were also requested for areas of London where GiGL did not hold any GIS data from the boroughs, ie. where GiGL held only MHCLG data for Green Belt and/or no data for MOL.

30.   Responses were eventually received from all planning authorities. GiGL data were confirmed to be correct by eight local authorities, and the other 25 (24 boroughs and the LLDC) provided new data. The new GIS data proved the same as those which GiGL held already for a total of nine boroughs; for 15 boroughs and the LLDC the new GIS data provided new or updated information for some or all of the sites. The data were processed by GiGL and collated into the standardised regional dataset.

31.   GiGL manages data on the behalf of its partnership of over 50 organisations. It also works with local voluntary groups, researchers and members of the public, and
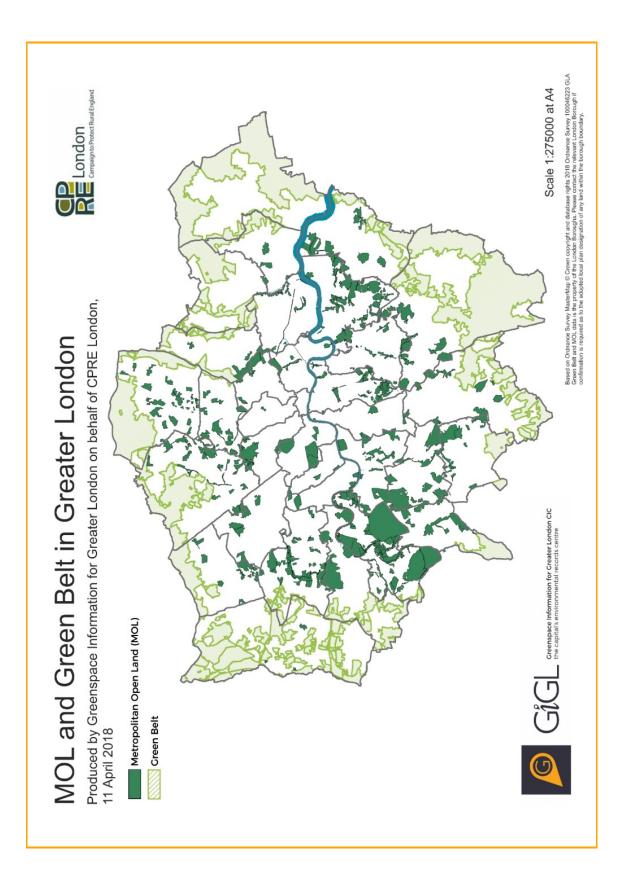
informs the planning process through the provision of written reports containing interpreted data and information to environmental consultancies. The up-to-date and complete MOL and Green Belt datasets gained as a result of this research are a useful addition to their important resources. Unfortunately, data from one borough could not be added to the database for future reference, as it was provided only for use in this report. The data will need to be updated on an ongoing basis – in some cases very soon, as around 14 boroughs are in the process of reviewing their Local Plans, and at least three look likely to propose changes to the area designated as Green Belt or MOL as part of this process. Any expected updates were noted in the GiGL database so that they can be followed up at the appropriate time, and the datasets will be added to their annual data verification schedule.

32.   In order to obtain a sense of the character of designated Green Belt and MOL, GiGL analysed the data against other datasets of open space and site designations, in particular land use and Sites of Importance for Nature Conservation (SINCs) datasets managed by GiGL, and designated sites and Ancient Woodland datasets published by Natural England, to provide the results below.

Main findings

33.   The following map, table and data visualisation present the main findings from GiGL's data analysis. Overall, within Greater London they found that:

- 35,109 hectares of land, just over 22%, is designated as Green Belt.

- 15,681 hectares, almost 10%, is designated as Metropolitan Open Land.

- More than 90% of the Green Belt within London is contained in just 10 of the 20 Outer London boroughs.

- More than half of the Green Belt within London is found in just three Outer London boroughs - Bromley, Havering and Hillingdon.

- More than half of the total area of Bromley and Havering is designated Green Belt.

- Just over a quarter (27%) of MOL is contained within the 12 Inner London boroughs, which unsurprisingly have no Green Belt (with the minor exception of Greenwich which has 1 hectare of Green Belt).

- Unlike other Outer London boroughs, Richmond has more MOL than Green Belt land.

- More than half of the total area of Richmond is designated Green Belt or MOL.

- Havering is the only London borough that has no designated MOL (excluding the City of London which has few large areas of green open space).

MOL and Green Belt in Greater London

Produced by Greenspace Information for Greater London on behalf of CPRE London,
11 April 2018

CPRE London
Campaign to Protect Rural England

Metropolitan Open Land (MOL)

Green Belt

GiGL
Greenspace Information for Greater London CIC
the capital's environmental records centre

Scale 1:275000 at A4

	Metropolitan Open Land		Green Belt		Total % of borough designated as MOL or Green Belt
	Area (ha)	% of total area of borough	Area (ha)	% of total area of borough	
Inner London Boroughs / Councils					
Camden	378	17.4	0	0.0	17.4
City of London	0	0.0	0	0.0	0.0
City of Westminster	449	20.4	0	0.0	20.4
Greenwich	1177	23.3	1	0.0	23.3
Hackney	222	11.6	0	0.0	11.6
Hammersmith & Fulham	145	8.5	0	0.0	8.5
Islington	13	0.9	0	0.0	0.9
Kensington & Chelsea	78	6.3	0	0.0	6.3
Lambeth	120	4.4	0	0.0	4.4
Lewisham	347	9.8	0	0.0	9.8
Southwark	490	16.4	0	0.0	16.4
Tower Hamlets	163	7.6	0	0.0	7.6
Wandsworth	704	20.0	0	0.0	20.0
Outer London Boroughs / Councils					
Barking & Dagenham	137	3.6	531	14.1	17.7
Barnet	663	7.6	2385	27.5	35.1
Bexley	638	9.9	1117	17.4	27.3
Brent	301	7.0	0	0.0	7.0
Bromley	682	4.5	7724	51.4	56.0
Croydon	413	4.8	2195	25.4	30.2
Ealing	868	15.6	309	5.6	21.2
Enfield	581	7.1	3068	37.3	44.4
Haringey	453	15.3	61	2.1	17.4
Harrow	312	6.2	1088	21.6	27.8
Havering	0	0.0	6071	53.0	53.0
Hillingdon	37	0.3	4968	42.9	43.3
Hounslow	777	13.7	1225	21.6	35.4
Kingston upon Thames	545	14.6	639	17.2	31.8
Merton	963	25.6	0	0.0	25.6
Newham	212	5.5	79	2.1	7.5
Redbridge	9	0.2	2063	36.6	36.7
Richmond upon Thames	3052	52.0	135	2.3	54.2
Sutton	537	12.2	605	13.8	26.0
Waltham Forest	214	5.5	846	21.8	27.3
Total for Greater London	**15681**	**9.8**	**35109**	**22.0**	**31.9**

Source: Greenspace Information for Greater London CIC (www.gigl.org.uk), August 2018

34.   These figures are also represented in the following data visualisation which shows the distribution of Green Belt and MOL across London. This reveals how the combined area of Green Belt and MOL decreases significantly as you get closer to central London with Islington containing by far the smallest combined area. This indicates how precious protected land is in many Inner London boroughs, especially Islington, Kensington and Chelsea, Lambeth, and Tower Hamlets, as well as in Brent and Newham in Outer London.   This visualisation also shows how the majority of Green Belt land within Greater London is concentrated in Outer London boroughs to the west, north and east of central London, with relatively small areas in the south west, although in Richmond this is redressed by its relatively large area of MOL.

Area of Green Belt and MOL per borough
Produced by Greenspace Infromation for Greater London CIC on behalf of CPRE London, July 2018

Green Belt and MOL per borough
8,500
4,250
850
Area of MOL (Ha)
Area of Green Belt (Ha)

Greenspace Information for Greater London CIC
the capital's environmental records centre

Based on Ordnance Survey MasterMap © Crown copyright and database rights 2018
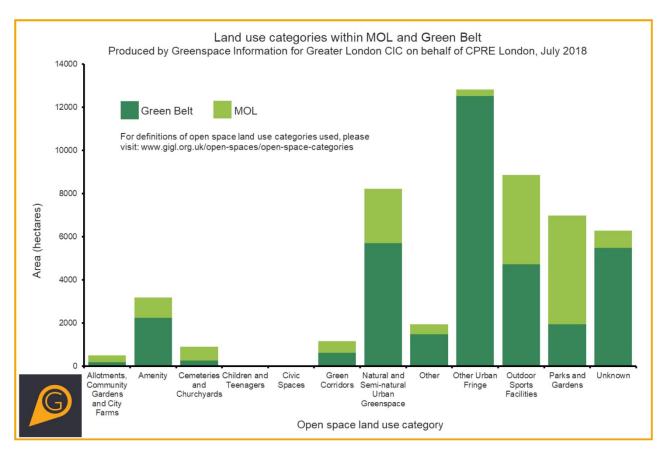Ordnance Survey 100046223 GLA

Land use

35.   As part of the data analysis, GiGL identified the different land uses within Green Belt and MOL by borough council according to the open space categories used previously by Government (in Planning Policy Guidance note17, Planning for Open Space, Sport and Recreation).   The results are presented in the following table and bar chart.

% of total area of MOL and Green Belt that is covered by the following open space land use categories*:

*For definitions of the open space land use categories used, please visit: www.gigl.org.uk/open-spaces/open-space-categories

	Allotments, Community Gardens and City Farms	Amenity	Cemeteries and Churchyards	Children and Teenagers	Civic Spaces	Green Corridors	Natural and Semi-natural Urban Greenspace	Other	Other Urban Fringe	Outdoor Sports Facilities	Parks and Gardens	Unknown
Inner London Boroughs / Councils												
Camden	0.4	3.1	3.9	0.0	0.0	0.1	0.0	0.7	0.0	72.2	16.3	3.3
City of London	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
City of Westminster	0.0	2.7	0.0	0.0	0.5	0.9	0.0	3.5	0.0	0.0	83.8	8.5
Greenwich	1.1	12.1	4.3	0.0	0.0	0.6	23.7	4.3	2.3	27.9	19.3	4.5
Hackney	0.4	10.2	0.0	0.1	0.0	7.2	0.1	0.0	0.0	18.2	60.3	3.4
Hammersmith & Fulham	4.0	0.0	14.3	0.0	0.0	1.5	0.0	0.0	0.0	0.0	77.9	2.3
Islington	0.0	7.1	0.0	0.0	0.0	17.6	0.0	0.0	0.0	70.4	0.0	4.9
Kensington & Chelsea	0.0	0.0	44.1	0.0	0.0	1.1	0.0	0.0	0.0	3.4	47.4	3.9
Lambeth	0.3	1.8	0.0	0.0	0.3	0.0	48.9	0.0	0.0	1.0	46.4	1.3
Lewisham	3.4	2.2	9.1	1.0	0.0	1.5	23.4	1.3	0.1	10.1	43.8	4.0
Southwark	2.1	8.1	9.5	0.1	0.0	1.2	19.5	0.8	0.0	33.2	13.6	11.8
Tower Hamlets	3.0	0.3	6.7	0.0	0.0	0.5	2.3	0.0	0.0	1.6	82.4	3.2
Wandsworth	0.2	0.9	9.9	0.0	0.0	1.7	52.0	0.0	0.0	15.1	16.9	3.2
Outer London Boroughs / Councils												
Barking & Dagenham	0.7	2.7	1.3	0.0	0.0	1.1	27.4	10.9	10.0	8.9	30.2	6.7
Barnet	2.0	8.5	4.2	0.0	0.0	1.8	9.6	0.5	16.5	27.3	5.1	24.5
Bexley	1.1	6.5	0.2	0.0	0.0	1.9	22.8	7.3	20.7	7.5	14.8	17.2
Brent	1.9	11.4	1.3	0.0	0.0	0.7	45.0	0.9	0.0	17.7	19.0	2.2
Bromley	0.3	5.0	0.3	0.0	0.0	0.9	14.7	3.6	53.9	11.7	2.3	7.2
Croydon	0.8	6.9	0.8	0.2	0.0	1.6	37.9	2.6	4.9	28.9	3.5	12.0
Ealing	1.4	2.5	2.4	0.0	0.0	4.5	24.1	1.1	2.7	46.9	8.9	5.5
Enfield	1.6	14.7	1.5	0.0	0.0	4.1	4.6	1.3	37.7	14.3	13.7	6.5
Haringey	4.2	1.3	4.1	0.0	0.0	6.5	15.4	1.8	0.2	28.9	34.0	3.6
Harrow	0.7	14.6	0.6	0.0	0.0	1.4	27.6	0.2	20.3	17.6	3.1	13.9
Havering	0.3	2.6	0.7	0.1	0.0	2.0	10.3	5.1	49.6	11.0	6.7	11.7
Hillingdon	0.4	3.4	0.6	0.0	0.0	1.0	15.7	6.0	22.3	9.0	6.7	34.9
Hounslow	2.5	10.1	1.0	0.0	0.1	3.0	13.8	7.4	4.2	15.0	28.0	14.9
Kingston upon Thames	2.2	1.2	1.5	0.0	0.0	2.5	9.3	10.7	28.3	25.9	2.4	16.0
Merton	1.9	1.0	4.1	0.0	0.0	3.2	38.7	0.8	0.7	33.4	12.9	3.3
Newham	0.6	6.2	24.0	0.0	0.0	9.2	0.1	7.1	0.2	5.0	34.6	13.0
Redbridge	1.1	3.8	1.0	0.0	0.0	1.1	10.3	1.1	28.1	25.9	17.3	10.4
Richmond upon Thames	1.0	4.7	1.4	0.0	0.0	7.5	8.6	1.8	2.6	17.2	50.6	4.4
Sutton	0.9	5.2	1.7	0.0	0.0	0.9	6.7	16.8	22.2	24.5	13.7	7.5
Waltham Forest	0.8	23.6	0.2	0.0	0.0	4.3	41.3	1.6	2.0	16.5	4.5	5.3
Total for Greater London	**1.0**	**6.2**	**1.8**	**0.0**	**0.0**	**2.3**	**16.2**	**3.8**	**25.2**	**17.4**	**13.7**	**12.3**

Source: Greenspace Information for Greater London CIC (www.gigl.org.uk), August 2018

Land use categories within MOL and Green Belt
Produced by Greenspace Information for Greater London CIC on behalf of CPRE London, July 2018

For definitions of open space land use categories used, please visit: www.gigl.org.uk/open-spaces/open-space-categories

36.   These figures show that outdoor sports facilities account for just over a quarter of MOL and 13% of Green Belt land in Greater London. A further third of MOL consists of parks and gardens which provide informal recreational opportunities. The 'other urban fringe' category, which includes agriculture, horticulture and equestrian land uses, accounts for just over a third of the Green Belt. In addition, 'natural and semi-natural urban greenspace', which includes commons, country parks, woodland and nature reserves, comprise around 16% of MOL and 16% of Green Belt. This shows how such protected land offers a wide range of different environmental and social benefits. While this is useful information, the relatively large area of Green Belt and MOL categorised as being of 'unknown' land use under this methodology – more than a tenth of the total combined area - suggests that the above figures need to be treated with caution. This gap in the available data should be addressed to obtain a more comprehensive and accurate picture of land use categories within Green Belt and MOL.

Nature conservation

37.   More detailed analysis by GiGL of the data that have been collected through this project has revealed that almost half of the Green Belt and MOL in Greater London is of local, national, or international importance for nature conservation. Using existing open data published by Natural England on the location of land which has a statutory designation as: a Local Nature Reserve (LNR), Site of Special Scientific Interest (SSSI), or National Nature Reserve (NNR) – under national legislation – or a Special Protection Area (SPA), Special Area for Conservation (SAC) or Ramsar site under international legislation – GiGL has shown the extent to which these overlap with Green Belt and MOL designation. GiGL data analysis has also

revealed the extent to which 'Sites of Importance for Nature Conservation' (SINCs) - a non-statutory designation for sites in Greater London identified as important to wildlife conservation by borough councils in consultation with a panel of local experts - are covered by Green Belt and MOL. The headline figures are shown in the following table.

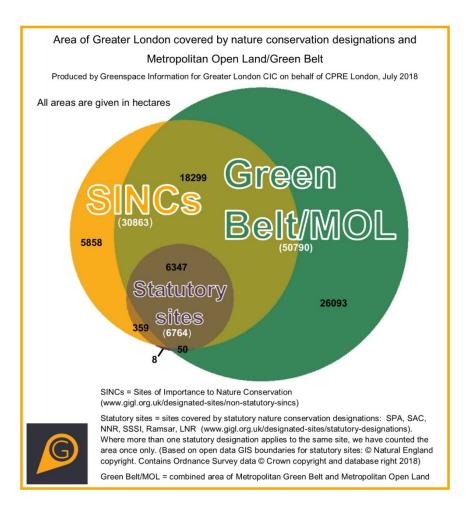|	Statutory sites (SSSI, SPA, SAC, NNR, Ramsar, LNR)** *Where more than one statutory designation applies to the same site, we have only counted the area once.*			Non-statutory sites only *Sites which are designated as SINCs* but do NOT also have statutory designations*		Total % area of MOL and Green Belt covered by nature conservation designations (Sum of statutory and non-statutory sites)
	Total area of statutory sites in borough (hectares)	% area of statutory sites that is within MOL and Green Belt	% area of MOL and Green Belt designated as statutory sites	Area of SINCs *not* covered by statutory designations (hectares)	% area of MOL and Green Belt designated as non-statutory SINCs only	
Inner London Boroughs / Councils						
Camden	18	91	4	396	88	93
City of London	0	N/A	N/A	33	N/A	N/A
City of Westminster	2	0	0	520	89	89
Greenwich	144	100	12	987	49	61
Hackney	26	52	6	198	46	52
Hammersmith & Fulham	13	95	9	248	55	64
Islington	6	40	17	86	82	99
Kensington & Chelsea	0	N/A	0	151	87	87
Lambeth	14	100	11	265	81	92
Lewisham	100	95	27	420	53	81
Southwark	58	99	12	433	55	66
Tower Hamlets	26	92	15	406	77	92
Wandsworth	107	100	15	714	74	89
Outer London Boroughs / Councils						
Barking & Dagenham	178	96	26	393	21	46
Barnet	154	94	5	1012	31	35
Bexley	132	100	8	1544	54	62
Brent	158	100	52	293	20	73
Bromley	541	95	6	2167	24	30
Croydon	355	97	13	1245	41	55
Ealing	54	92	4	1021	61	66
Enfield	379	100	10	987	25	36
Haringey	110	98	21	451	66	87
Harrow	143	100	10	661	42	52
Havering	650	62	7	1534	18	25
Hillingdon	615	99	12	1529	27	39
Hounslow	183	99	9	1187	50	59
Kingston upon Thames	46	97	4	361	27	30
Merton	322	98	33	515	46	78
Newham	0	N/A	0	722	71	71
Redbridge	96	99	5	1486	65	69
Richmond upon Thames	1572	100	49	1201	36	85
Sutton	37	76	2	634	49	52
Waltham Forest	527	100	49	354	28	77
Total for Greater London	**6764**	**95**	**13**	**24157**	**36**	**49**

* SINC = Site of Importance to Nature Conservation. For more information, please see www.gigl.org.uk/designated-sites/non-statutory-sincs

** SSSI = Site of Special Scientific Interest; SPA = Special Protection Area; SAC = Special Area for Conservation, NNR = National Nature Reserve, LNR = Local Nature Reserve; Ramsar = Ramsar Convention on Wetlands of International Importance. For more information, please see www.gigl.org.uk/designated-sites/statutory-designations

GIS boundaries for statutory sites were obtained from open data published by Natural England under an Open Government Licence (© Natural England copyright. Contains Ordnance Survey data © Crown copyright and database right 2018). LNR boundaries are indicative rather than authoritative.

Source: Greenspace Information for Greater London CIC (www.gigl.org.uk), August 2018

38.   This table shows that the great majority (95%) of the area of statutory nature conservation sites is designated as Green Belt and MOL. It also shows that all boroughs except Newham, Kensington and Chelsea, and the City of London have some area of statutory site within their boundaries.

39.   Many of these nature conservation designations overlap with each other – i.e. more than one designation can apply to the same site - as well as with Green Belt and MOL designations. The extent to which statutory and non-statutory nature conservation designations overlap with MOL and Green Belt is shown in the diagram below, which summarises the data in the above table.

Area of Greater London covered by nature conservation designations and Metropolitan Open Land/Green Belt

Produced by Greenspace Information for Greater London CIC on behalf of CPRE London, July 2018

All areas are given in hectares

SINCs = Sites of Importance to Nature Conservation (www.gigl.org.uk/designated-sites/non-statutory-sincs)

Statutory sites = sites covered by statutory nature conservation designations: SPA, SAC, NNR, SSSI, Ramsar, LNR (www.gigl.org.uk/designated-sites/statutory-designations). Where more than one statutory designation applies to the same site, we have counted the area once only. (Based on open data GIS boundaries for statutory sites: © Natural England copyright. Contains Ordnance Survey data © Crown copyright and database right 2018)

Green Belt/MOL = combined area of Metropolitan Green Belt and Metropolitan Open Land

40.   This shows that, overall, Green Belt or MOL within London covers 95% of land designated as a statutory site of importance for nature conservation under national or European legislation. It also shows that 59% of land designated as a Site of Importance for Nature Conservation (SINCs) and which is not within a statutory site is within either Green Belt or MOL. This is particularly significant as such SINCs are otherwise only subject to non-statutory protection which many consider to be insufficiently robust.   Moreover, with the growing emphasis on the importance of connectivity between wildlife sites (Lawton, 2010), it is vital that the conservation value of the wider Green Belt and MOL beyond these designated nature conservation sites is properly recognised in policy and decision-making.

Ancient woodland

41.   Ancient woodland is land which has been continuously wooded since 1600 or before and is one of our most precious and irreplaceable wildlife and cultural habitats. The last 100 years has seen a rapid decline in the area of ancient woodland due to clearance for farming, planting with conifers, or built development. The protection afforded ancient woodland through the planning system has recently been strengthened in the revised National Planning Policy Framework (NPPF) which states that only 'wholly exceptional' development should be allowed to affect such sites.

42.   Given development pressures in London and concerns about inadequate protection, GiGL analysed available data to reveal the extent of ancient woodland in each borough and the extent to which this is covered by Green Belt and MOL designation. The results are set out in the following table.

	Ancient Woodland			
	Total area of Ancient Woodland in borough (hectares)	Total area of Ancient Woodland in MOL (hectares)	Total area of Ancient Woodland in Green Belt (hectares)	% of total area of Ancient Woodland that is within MOL or Green Belt
Inner London Boroughs / Councils				
Camden	24.1	24.1	n/a	100.0
City of London	0.0	n/a	n/a	n/a
City of Westminster	0.0	0.0	n/a	n/a
Greenwich	113.9	113.8	0.0	99.8
Hackney	0.0	0.0	n/a	n/a
Hammersmith & Fulham	0.0	0.0	n/a	n/a
Islington	0.0	0.0	n/a	n/a
Kensington & Chelsea	0.0	0.0	n/a	n/a
Lambeth	0.0	0.0	n/a	n/a
Lewisham	10.9	10.9	n/a	99.9
Southwark	20.7	20.5	n/a	99.1
Tower Hamlets	0.0	0.0	n/a	n/a
Wandsworth	0.0	0.0	n/a	n/a
Outer London Boroughs / Councils				
Barking & Dagenham	0.0	0.0	0.0	n/a
Barnet	71.6	10.9	50.7	86.1
Bexley	178.6	71.9	89.6	90.5
Brent	0.0	0.0	n/a	n/a
Bromley	843.0	50.6	770.1	97.4
Croydon	318.7	36.1	267.3	95.2
Ealing	11.4	11.4	0.0	99.8
Enfield	122.8	0.0	122.8	100.0
Haringey	58.7	58.4	0.0	99.5
Harrow	45.9	0.0	45.9	99.9
Havering	82.2	n/a	80.1	97.4
Hillingdon	321.3	0.0	321.0	99.9
Hounslow	0.0	0.0	0.0	n/a
Kingston upon Thames	31.6	7.1	23.6	97.0
Merton	0.0	0.0	n/a	n/a
Newham	0.0	0.0	0.0	n/a
Redbridge	69.5	0.0	69.0	99.3
Richmond upon Thames	0.0	0.0	0.0	n/a
Sutton	0.0	0.0	0.0	n/a
Waltham Forest	179.6	17.4	159.8	98.7
Total for Greater London	**2504.4**	**432.9**	**1999.8**	97.1

Source: Greenspace Information for Greater London CIC (www.gigl.org.uk), August 2018

43.   The table shows that over 97% of ancient woodland within London is covered by Green Belt or MOL designation. Almost 80% of this is to be found within just six Outer London boroughs – Bexley, Bromley, Croydon, Enfield, Hillingdon, and Waltham Forest – although a significant proportion is to be found in four Inner London boroughs – Camden, Greenwich, Lewisham and Southwark – within areas designated as MOL. These figures show the importance of Green Belt and MOL designation for the protection of ancient woodland.

Conclusions and Recommendations

44.   This report presents for the first time comprehensive and reliable figures for the location, extent and character of Green Belt and MOL across the whole of Greater London. This information was up-to-date as of February 2018.   In showing the distribution of Green Belt and MOL between London boroughs, it shows that just a few Outer London boroughs are responsible for a significant proportion of Green Belt land, and that the areas of MOL in many Inner London Boroughs are relatively small. It also shows how important Green Belt and MOL land is for nature conservation and the protection of ancient woodland.

45.   The primary purpose of this research has been to establish a robust baseline to enable the monitoring of changes to these areas on an annual basis. We encourage the GLA and London Boroughs to contribute to this annual monitoring process by helping to ensure that the GiGL datasets are kept up-to-date and any anomalies are addressed. By entrusting the collation of such regional data to GiGL, a level of consistency, accuracy and impartiality is ensured that will not only offer a clearer picture of the trends affecting Green Belt and MOL, but will also create the necessary conditions to promote a more coordinated approach across boroughs to defending and improving protected open spaces.

46.   In addition, CPRE London makes the following wider recommendations to strengthen policies to protect and enhance Green Belt and MOL within London:

- the Government should allow local authorities to develop Local Plans that take a more realistic view in setting housing targets, taking full account of environmental constraints and adopting local targets for housing which meet the needs of communities without the loss of Green Belt and MOL.

- the Mayor of London should take the opportunity afforded by the preparation of the new London Plan to:

   - adopt a more proactive approach to prevent the loss of Green Belt land as a result of Local Plan reviews.

   - ensure stronger protection of Metropolitan Open Land, prevent its loss, and to emphasise that development, including through 'land swaps', will not be permitted except in wholly exceptional circumstances and where resulting MOL land is of the same or greater quantity and quality. The Mayor of London should also undertake to intervene to prevent the loss of MOL threatened by inappropriate development.

- recognise the value of Green Belt and MOL designation in safeguarding ancient woodland and other valuable nature conservation sites.

- there should be greater cooperation between the Mayor and London boroughs to safeguard Green Belt and MOL when Local Plans are reviewed and updated. This should include working together to obtain a more accurate picture of the land use within Green Belt and MOL, and targeting measures to enhance it.

- Wildlife and woodland organisations should recognise the importance of Green Belt and MOL designations in protecting and enhancing sites of importance for nature conservation, including ancient woodland, and in connecting these sites as a wildlife network.

47.   In the longer run, and in line with the established CPRE position, the Government should legislate for 'third party right of appeal' against planning decisions where proposed development would result in the loss of Green Belt or MOL, so that local communities – as well as developers – have the right to hold decision makers fully to account for decisions that affect them.

CPRE London, August 2018

Key references and further reading

Campaign to Protect Rural England, 2018, The State of the Green Belt, CPRE

CPRE London, 2016, The Strongest Protection? Green Belt and MOL in Greater London the real story, CPRE London

Department for the Environment, 1989, Regional Planning Guidance note 3, HMSO

G.E Cherry, 1975, Environmental Planning 1939-1969 – volume II National Parks and Recreation in the Countryside, HMSO

Greater London Authority, 2017, London Plan Annual Monitoring Report, GLA

Greater London Council, 1976, Greater London Development Plan, GLC

London Green Belt Council, 2017, The accelerating loss of London's Green Belt – who is to blame?, LGBC

London Planning Advisory Committee (1992) Open Space Planning in London, Llewelyn-Davies Planning and Environmental Trust Associates

London Wildlife Trust, 2015, Spaces Wild: championing the values of London's wildlife sites, LWT

Lawton, Sir John, 2010, Making Space for Nature: A review of England's Wildlife Sites and Ecological Network, DEFRA

Mayor of London, 2002, Connecting with London's Nature: the Mayor's Biodiversity Strategy, GLA

Mayor of London, 2017, The London Plan: the Spatial Development Strategy for Greater London – draft for public consultation, GLA

Mayor of London, 2018, London Environment Strategy, GLA

Mayor of London, August 2018, Minor suggested changes to the draft London Plan, GLA

Ministry of Housing, Communities and Local Government, 2018, National Planning Policy Framework, OGL

Ministry of Housing, Communities and Local Government, July 2018, Letter from the Communities Secretary to the Mayor of London, MHCLG