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Climate Risk, the Green Belt and the Draft London Plan

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Introduction

Action for Enfield's Future (AfEF) seeks to weave together our separate responses to the following policies to create a coherent, evidence-based narrative :

MBUL1: Spatial Strategy
HN1: Increasing London's housing stock
HN9: Accessible housing
GHR4: Heat risk
GHR5: Flood risk and drainage
GHR6: Trees, biodiversity and geodiversity
PV7: Sustainable development and enhancement of the Green Belt

In summary, we applaud the four Good Growth objectives and the aim to leave no-one behind. We question whether the **two** key objectives to "*fix the housing crisis in London*" and "*to deliver sustainable economic growth*" will actually "*benefit Londoners across our city*" if, **and when**, the supplementary "*ambitious climate commitments*" **are not realised**. Because the evidence of 2026 is that "*London is cooking*"[1]

[1] Heat Ready London

Within 20 years, London's population is projected to increase by 1 million people, up 9%[2]. To meet the housing need, 89,300[3] new homes are planned, per annum, until 2036, an increase of 23% over the current figure of 3.8m[4](3,790,210) . On that basis, somewhere between 10% and perhaps as many as 15% of Londoners (accounting for backlog, housing formation and other needs[5]) will live in climate resilient, new homes, but the vast majority of Londoners **will not** (without costly retrofitting). Currently 12% of London's population[6] are over 65 years old, projecting to 16.7% by 2046[7] or 1,662,000 million older people.

AfEF can only speculate on the **number** of older people who will occupy new, climate adapted, accessible and adaptable new homes whether in 2036 or 2046. But we suggest that this will be nowhere near enough to prevent climate-related excess mortality among this vulnerable population, or the associated costs. We therefore counsel that a new Policy HN11 explicitly considers the costs and benefits, alongside the risks, of proactively providing suitable later-life homes, rightsizing[8], within new developments.

Our concern is for vulnerable Londoners. We question a plan that proposes indeterminate development (in terms of site and area) on London's climate-protective green infrastructure without a clear assessment of the risks and unintended health and economic consequences[9] for Londoners particularly vulnerable to heat stress. Overall, by 2046 the number of people aged 65 and above is projected to increase by 50%, while those aged 75+ will increase by 77%; and those aged 80+ will more than double. "*This demographic shift has significant implications for the type, tenure, and accessibility of housing required"*.[10]

As a voluntary organisation we do not have the capacity or knowledge to assess the extent of the proposed green belt development across London, but we know that in Enfield reassurances about green belt release being highly focused on well-connected, sustainable places, minimised and landscape-led do not follow the evidence. Without the necessary evidence, we think that plans to build as many as 56,000 homes on London's critical green infrastructure are misguided and need re-evaluation.

If London is a single market, surely the adjacent Local Planning Authorities and the wider UK are markets also? UK-wide policy changes, such as devolution and the 'new age of industrialisation', might be expected to redistribute population within 20 years, helping to address London's housing needs.

We are, however, deeply concerned about the critical backlog of unmet need now. Homelessness and over-crowding, particularly where children are concerned, must be addressed with urgency. Addressing underoccupancy and "rightsizing" could help.

We suggest that a focus on the housing needs of Londoners in later life, and an objective assessment of the climate mitigating effects of London's green belt, with relevant policy responses, would bring wider housing, economic and welfare benefits for <u>all.</u>

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[2] **SHMA paras 91 and 118**
[3] **SHMA para 199**
[4] London's Housing Stock - Research Unit - November 2024 (1).pdf
[5] **SHMA paras 7,8,9,10.**
[6] **SHMA paras 206, 91, 118**
[7] **SHMA paras 118 and 206**
[8] Rightsizing_MSA_Final2.pdf
[9] A Well-Adapted UK - Climate Change Committee **Built Environments and Communities**
[10] **SHMA para 206**

1 Recent evidence changes perspectives

"*Our lives, our landscapes and our homes are under increasing pressure from the changing climate. But we are not powerless. In an increasingly unstable world, being well adapted to climate change is fundamental to securing our food, energy and economic security*".

Baroness Brown, Chair of the Adaptation Committee in British way of life under threat from heat, flooding, and drought May 2026

1.1The National Planning Policy Framework (NPPF) and the draft London Plan (dLP) guide future development. The NPPF "*sets out the government's policies for plan making and for making decisions on development proposals in England*" and development plans are a "*priority for providing housing and other development in a sustainable manner*"... (NPPF Introduction para 1).

1.2 Plans are intended to be sustainable and sufficiently resilient to future conditions.

1.3 AfEF considers that recent research reveals rapidly evolving evidence about climate and environmental risks to London and the UK because of extreme overheating[11].

1.4 There has been a significant expansion of this evidence during 2026, including:

- National Emergency Briefing Nov 2025 (NEB)
- Mayor's Heat Ready London June 2026
- A well-adapted UK The Fourth Independent Assessment of UK Climate Risk (CCRA4-IA) May 2026
- The government's report Global biodiversity loss, ecosystem collapse and national security report Feb 2026
- ...reported to the UN Security Council by the Foreign Secretary on Sept 23rd 2026
- A heat circuit breaker for the UK National Heat Risk Commission Sept 2026

2 London is increasingly exposed to climate risk

2.2 London is particularly exposed to increasing heat[11], drought, flooding[12] and related environmental risks, as recognised in dLP Chapter 1, section 1.19 Managing Adverse Risks, quoting the Climate Change Committee report that highlighted London as amongst the highest risk areas in the UK for heat deaths.

2.3 The BBC has published a helpful interactive chart[13] that lays this out by post code.

2.4 Yet the dLP does not appear to have assessed the implications of these risks sufficiently in the London context, particularly when considering the potential scale of Green Belt development and the absence of plans that show its limits.

2.5 In Enfield at least, this area is not simply empty Green Belt. It is valuable green infrastructure. It contains important habitats, Sites of Importance for Nature Conservation (SINCs), woodland, hedgerows, grassland and watercourses and vast stretches of viable farmland[14]. The damage caused to this critical green infrastructure has **not** been factored into plans for:

- Crews Hill & Chase Park New Town (CH&CP NT) proposals for 21,000 homes could remove up to **884 ha** (New Towns Taskforce, p.37), and potentially **2,000 ha** (SEA Table G2), of green

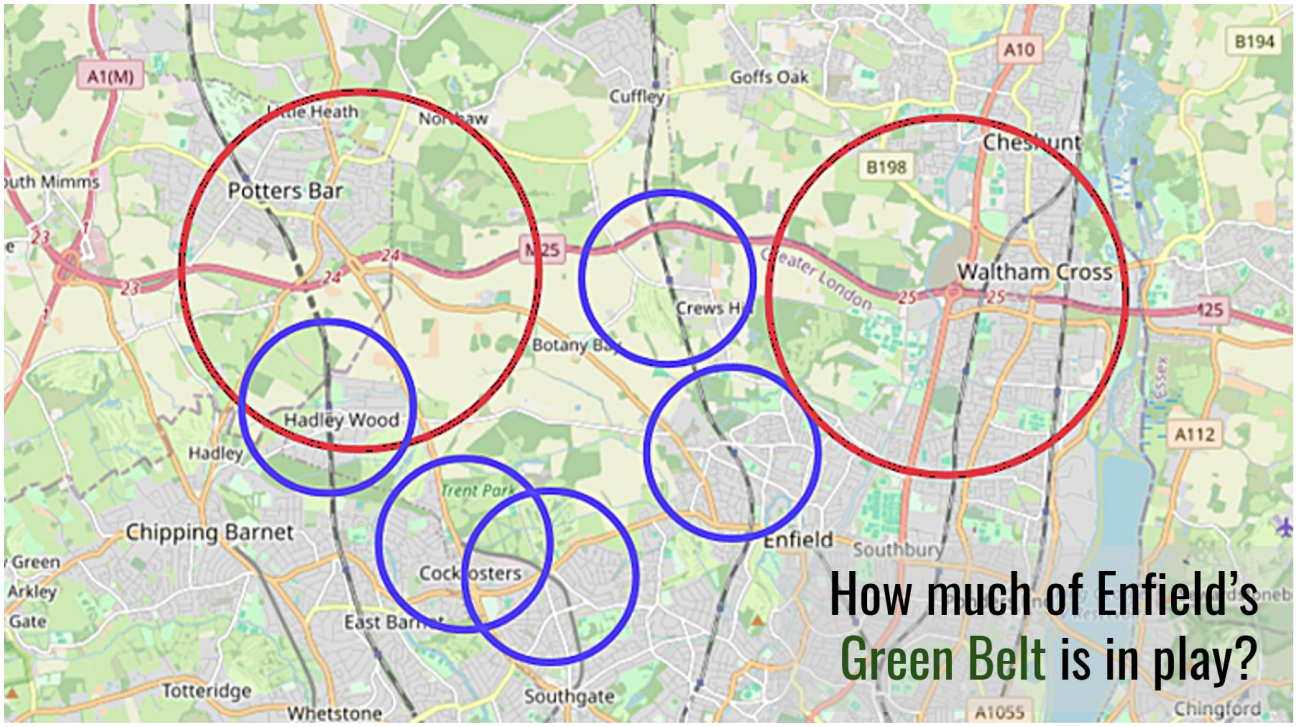
[11] **GHR4 Heat risk**
[12] **GHR5 Flood risk and drainage**
[13] **UK summer 2026: BBC postcode lookup shows how hot and dry it was - BBC News**
[14] **GHR6 Trees, biodiversity, and geodiversity**

infrastructure. Crews Hill and Chase Park (CH&CP NT) is identified as a 10yr and 20yr BLG Green Belt Residential-led mixed use area (area 61 dLP Figs 2.1 and 2.2). The dLP assumes 7,000 homes can be delivered in CH&CP by 2036/37, around twice the number in Enfield's own Local Plan trajectory for the same period.

- A **BLG Green Belt industrial area** in the adjacent M25/A10 Northern Lea Valley (area 73), and a **BLG Green Belt future candidate industrial area** (area 82) at M25 North Potters Bar.
- Allocations for Data Centres [15] in the same area that are already going ahead.

2.6 Taken together, these proposals raise the possibility that much of Enfield's Green Belt could, during the life of the dLP, either be developed or become fragmented and surrounded by development[16]**.**

Figure 1: Green Belt areas covered by the dLP housing (blue) and industrial location test (red)[17]



2.7 It matters in London because the dLP itself says that it aims to: "*strike a careful balance"* and tackle *"the most pressing social and environmental challenges in our city (such as affordable housing, accessibility and heat risk)"* while avoiding *"unacceptable cumulative adverse impacts"* while "*focusing on sustainable locations"* (para 1.11) Following revisions to the NPPF and new housing targets for London, the Mayor of London commissioned a review[18] of Green Belt land which falls within Greater London to "*be used as part of the evidence base to inform the next London Plan"*, suggesting that "*The Green Belt assessment would contribute towards the Strategic Housing Land Availability Assessment (SHLAA), a necessary component of the London Plan evidence base, helping to demonstrate how London's housing needs will be met"*[19]

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[15] **GLE3: Data centres**

[16] If Sadiq Khan's new London Plan is adopted, it would mark the beginning of the end of Enfield's Green Belt. – Better Homes Enfield

[17] ***Parts of the circles (especially the red circles) extend beyond Enfield and Greater London into neighbouring Hertfordshire. The Mayor has no power to allocate or release Green Belt land outside Greater London, so the dLP location tests only apply to the London side of the boundary.***

[18] The London Green Belt Review Feb 2026 **Overview p2 and Chap 2.3 p15**

[19] The London Green Belt Review Feb 2026 **Chap 2.3 p15**

2.8 It is not clear to us how this evidence was used. It seems not to be referenced in the SHLAA.

2.9 The introduction to the London Plan Green Belt Strategic Approach refers to the opposition to Green Belt Development arising from concerns about its **perceived** climate resilience, habitat and food growing functions (para 1.33). No objective evidence is presented to challenge these proven environmental benefits characterised as "perceptions" . The response, instead, is to say that "*any release should be highly focused on well-connected places, minimised, and landscape led*" (para 1.34). This is **not** the case as far as Enfield is concerned.

2.10 Taking Enfield as an example, we consider that the "careful balance", as referred to, cannot be verified without a London-specific assessment of the climate risks to all Londoners associated with the scale of Green Belt development proposed, transparency about the site, area, scale and objectively assessed impact.

3 The five missing risk assessments for London and vulnerable Londoners

3.1 **The impact of drought and water stress**[20]**:** The Climate Change Committee (CCC) finds drought and water as major climate risks. Recent Environment Agency evidence also shows the increasing significance of drought risk.

3.2 **Land, farming and food security**[21] The CCC shows land, farming and food security as significant climate risks. Green Belt land performs functions beyond its formal planning purposes, including food production, natural processes and climate adaptation.

3.3 **Health**[22] The CCC stresses the need to account for the vulnerability of people and communities to climate change. This is particularly important in London, where heat risk is increasing and the number of Londoners above 65 is projected to increase by 50% as the current peak of 20 – 40-year-olds age. (SHMA)

3.4 **Climate-related subsidence**[23] Increasing drought and heat[21] can contribute to shrinkage of London Clay and therefore to subsidence. The British Geological Survey has highlighted the implications of climate-related subsidence for millions of UK homes, **particularly in North London,** as does the CCC [24]

3.5 **Biodiversity and nature**[25] Both the NEB and the CCC emphasise the importance of nature-based responses to climate change. Green infrastructure has a direct role in climate adaptation as well as biodiversity protection. We support the intention behind GHR6 and GHR7 but note that Enfield's green space is natural, centuries old and already fully accessible[26]. Per GHR8, it needs protecting from development.

4 The imbalance between dLP objectives and priorities

4.1 The dLP Foreword states:

> *"The aim is to make the best possible use of City Hall's planning powers to achieve **two** key objectives: to **fix the housing crisis in London** and to **deliver sustainable economic growth** that*

[20] **GHR5 Flood risk and Drainage (should include drought, water stress ?)**
[21] **MBUL1 Spatial Strategy**
[22] **GHR4 Heat Risk (should include drought and water stress, subsidence risks?)**
[23] **Latest research emphasises climate-related subsidence risk to millions of British homes - British Geological Survey**
[24] **A Well-Adapted UK - Climate Change Committee**
[25] **GHR6 Trees, Biodiversity and Geodiversity**
[26] **Footpath Map – The Enfield Society**

benefits Londoners across our city. Crucially, we will do so ***while continuing to meet our ambitious climate commitments and improving our environment and green spaces***."

4.2 We welcome both objectives and the climate commitment. Our concern is the **relative weight given to them in practice**. The emphasis on housing and economic growth risks allowing short- and medium-term development objectives to take precedence over the environmental systems on which London's long-term resilience depends, creating a hierarchy within the GG Objectives.

4.3 This concern is reinforced by the timing and content of revisions to the NPPF Planning Practice Guidance. While guidance relevant to housing growth, effective use of land and Green Belt policy has been updated, important climate-related guidance, and guidance about older and disabled people's housing needs is substantially older.

Planning practice guidance 23 Sept 2026

- 6 March 2014 Open space, sports and recreation facilities, public rights of way and local green space
- 6 March 2014 Travel Plans, Transport Assessments and Statements
- 6 March 2014 Tree Preservation Orders and trees in conservation areas
- 13 March 2015 Transport evidence bases in plan making and decision taking
- 19 May 2016 Rural housing
- 28 July 2017Brownfield land registers
- 15 March 2019 Climate change
- 26 June 2019 Housing for older and disabled people
- 22 July 2019 Land stability
- 1 November 2019 Air quality
- 13 May 2020 Environmental Impact Assessment
- 31 December 2020 Strategic environmental assessment and sustainability appraisal
- 7 August 2022 Healthy and safe communities
- 14 August 2023 Renewable and low carbon energy
- 27 February 2025 Green Belt
- 27 February 2025 Effective use of land
- 9 June 2025 Natural environment
- 17 September 2025 Flood risk and coastal change
- 31 July 2026 Biodiversity net gain

4.4 This creates a potential imbalance between **rapidly changing climate evidence and a planning framework that has not been updated at the same pace.**

4.5 In particular, the dLP does not appear to be informed by the risks identified[27] in A Well-Adapted UK, including:

- **Drought and water stress**, including recent Environment Agency[28] evidence for London.
- **Land, farming[29] and food security[30]**, including the CCC's well-adapted land and food-security frameworks[31] and the Batters Review[32]
- **Health and vulnerability[33]**, including the CCC principle of accounting for vulnerabilities of people, places and nature[34]
- **Climate-related subsidence**, including the latest British Geological Survey[35] research on shrinkage of London Clay.

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[27] A Well-Adapted UK - Climate Change Committee **Chap 8 Priority risks under 2°C of global warming by 2050**
[28] 5. Environment - drought risks, impacts and actions: Drought prospects for spring 2026 - GOV.UK **and** london-drought-report-02-september-2026-3.pdf
[29] **MBUL1 Spatial Strategy**
[30] A Well-Adapted UK - Climate Change Committee **Chap 13 Land and Chap 15 Food security**
[31] Well-adapted land system - Climate Change Committee **and** Well-adapted food security system - Climate Change Committee
[32] Farming Profitability Review 2025: an independent review - GOV.UK
[33] A Well-Adapted UK - Climate Change Committee **Chapter 4 Health**
[34] A Well-Adapted UK - Climate Change Committee **, Annex 3: Impacts of adaptation on groups with protected characteristics and** Ten principles for effective adaptation **Principle 5 Account for vulnerabilities of people, places, and nature**
[35] Latest research emphasises climate-related subsidence risk to millions of British homes - British Geological Survey

5 London's Green Belt should be assessed for its climate mitigation functions

5.1 The legal purposes of the Green Belt have never been a comprehensive statement of the environmental functions performed by Green Belt land. The fact that environmental protection is not one of the statutory purposes does not mean that Green Belt land has no environmental value or 'natural' capital[36]. "*'Natural' capital is made up of the elements of nature that benefit people directly or indirectly. These assets include ecosystems, species, fresh water, land, minerals, the air and oceans, as well as natural processes and functions. Benefits can include goods (such as timber and food) and services (such as clean air and water)"*. The assessment assesses the economic value of good health (mental and physical), air temperature, carbon and air quality[37]**.** The explicit focus on parks overlooks the vast area of Enfield's accessible green belt that makes further economic contributions from the horticulture and agricultural benefits of its semi-rural environment. We ask whether the dLP is "Place making or Place Breaking" [38]and whether the dLP is, in this context, consistent with Chapter 4 of the NPPF, *Achieving sustainable development*, which encourages development that will "*support the rural economy and rural communities"*, while "*limiting development away from settlements to help safeguard the intrinsic character and beauty of the countryside"*

5.2 The climate emergency makes these functions increasingly important.

5.3 Both the NEB and CCC advocate nature-based approaches to the climate emergency, as did many respondents to the initial dLP consultation. "Nature" is the interconnected land, air and water systems that sustain life on earth and cannot be replicated within built environments. Incorporating nature recovery piecemeal into urban fabric, improving biodiversity net gain are vital considerations in urban development, but need intervention, are limited, cannot self-sustain and are not "natural". The NEB suggests that nature should be considered as **critical infrastructure,** as has recently been decided for data centres.

5.4 The question therefore needs to be asked explicitly:

What climate-resilience functions does London's Green Belt currently perform, where is the evidence and what would be lost if significant areas were developed?

These functions should include:

- protecting nature and biodiversity in one of the world's most nature-depleted countries.
- mitigating London's urban heat island effect and associated heat mortality.
- reducing flashflood risk.
- helping to manage drought and water stress.
- reducing the consequences, and costs, of shrinkage of London Clay.
- storing and sequestering carbon; and
- supporting food production[39] and wider ecosystem resilience.

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[36] **Natural capital account for London | London City Hall 2017 and London Assembly Research Unit London's Green Belt Feb 2026 and**
[37] **11015viv_nca_by_borough.pdf**
[38] **Placemaking or Place-Breaking? – Action for Enfield's Future**
[39] **MBUL1 Spatial Strategy**

6 Later life accommodation[40]: accessibility, climate resilience, underoccupancy, and "**rightsizing**"[41].

6.1 "*By enhancing the quality and quantity of older peoples housing (OPH) / later life housing (LLH) and offering more choice, not only can we improve the lives of senior citizens, but we can also save money for the NHS by avoiding unnecessary hospital admission from slips, trips and falls. **Rightsizing** to more age-appropriate housing can also release family homes to help ease the wider housing crisis. It's also important to think carefully about how we can support those who want to remain in their own homes to do so safely".*

Our Future Homes: Housing that promotes wellbeing and community for an ageing population - GOV.UK

6.2 The 2021 London Plan states *"Boroughs should also ensure a range of new homes are provided that meet the needs of those who wish to downsize, and that tenants in affordable homes are supported to downsize where they wish to do so"* (Para 4.9.1) *"Well-designed one- and two- bedroom units in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development"*(Para 4.10.3). *"Some older Londoners may wish to downsize, move closer to family or friends or be closer to services and facilities, but they may not want to move into specialist older persons housing. Boroughs and applicants should recognise the important role that new, non-specialist residential developments play in providing suitable and attractive accommodation options for older Londoners, particularly developments in or close to town centres, near to relevant facilities and in areas well-served by public transport."* (4.13.2)

6.3 The dLP seems to have no equivalent.

6.4 The NPPF Practical Planning Guidance (2019), Housing for older and disabled people, explains why it is important to plan for the housing needs of older people. It is important to quote this in full as it seems to us that the dLP has not done this, but neither is it clear that the revised NPPF expects it :

"The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking".

"The health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support. For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people".

[40] **HN1 Increase London's Housing Stock**
[41] **HN9 Accessible housing**

6.5 The ageing population creates a clear and growing need for accessible, adaptable and appropriately located, climate resilient housing. The Strategic Housing Market Assessment (SHMA) projects that the population of Londoners aged 65+ will grow by 50% by 2046. It estimates that 61% will be owner-occupiers, while 33% may require social housing. It also predicts substantially increased demand for accessible and adaptable homes. All LLH should be climate resilient, but this can only be guaranteed in new housing[42]

6.6 As pointed out by Lichfields[43], in its response to the NPPF consultation, it is vital that this practical guidance is revised to help boost the supply of older person's housing to provide clear guidance on how housing for older people should be considered when assessing housing need, making clear where it forms part of, and where needs are in addition to, the standard method[44].

6.7 There is an important relationship between the housing needs of older people and the availability of family-sized homes. Many older owner-occupiers under-occupy their homes: the proportion of homeowner households under-occupying rose from 33% in the mid-1990s to 43% in 2022. This is particularly pronounced among older households, although the evidence also shows that staying in a familiar family home is often a deliberate choice — "age in place".[45]

6.8 This suggests that providing attractive, accessible and affordable, climate resilient alternatives would support older people who wish to move to do so, potentially releasing larger homes for families. However simply assuming older people will "rightsize" would be wrong.

6.9 This does not mean that the answer is simply to build more specialist or retirement housing, or that more Green Belt development is needed. However, it is important to note that most older properties will be less climate resilient, bringing associated health risks and costs for the older occupants and society in general.

6.10 Demand for specialist and supported housing is also expected to grow.

7 Build the right homes, of the right sort, in the right places, rather than simply more homes

7.1 The London Plan requires 90% of new homes to meet M4(2) accessible and adaptable standards and 10% to meet M4(3) wheelchair-user standards. We applaud this significant uplift of NPPF requirements.

7.2 At the heart of our concerns is the reality that, as later life approaches, many Londoners find themselves in non-adapted, non-accessible, nor climate resilient, homes. It's too easy to assume that the policies governing new development will also apply to older construction – but they do not.

7.3 The opportunity to make new housing accessible and adaptable, with 100% climate resilience from the outset is preferable to relying on expensive retrofitting later, particularly considering the health implications for older people as climate change increases the need for homes that can cope with both heat and cold and the consequences.

7.4 New neighbourhoods **must** include housing (including affordable[46]) suitable for older people on appropriate, identified sites, including specialist accommodation where there is an evidenced need, in quantities sufficient for their new occupants to release family homes for those that need them.

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[42] **Healthy+Ageing+in+a+Changing+Climate.pdf**

[43] **Ageing Gracefully: The NPPF Consultation and Older Person's Housing**

[44] **The SHMA goes beyond the standard method using Demographic Modelling-Based Method and the microsimulation method. This is beyond our expertise we simply wonder why there is so little to show for it in the needs assessment for later life living.**

[45] **SHMA para 208**

[46] **Most older people in London are owner-occupiers, but a substantial minority live in social housing SHMA para 207**

New neighbourhoods should provide homes for key workers, families, younger households and people at different stages of life. The objective should be **mixed, inclusive communities, we are not advocating segregated retirement developments.**

8 "Rightsizing" should be incentivised, not assumed or overlooked

8.1 There is an important opportunity to provide attractive smaller homes for older households who would genuinely prefer to move, while respecting the wishes of those who want to remain where they are.

8.2 The SHMA itself recognises that wheelchair users will overwhelmingly need one- or two-bedroom homes and estimates that meeting newly arising wheelchair need could free up around 1,200 family-sized homes each year, assuming redistribution of existing larger homes.

8.3 The wider evidence therefore points towards a more refined approach:

identify the need → provide suitable accessible, climate resilient homes → create genuine opportunities to move → allow larger homes to be released

8.4 This is different from assuming that an ageing population automatically creates a requirement for large numbers of new retirement homes.

9 Location matters

9.1 Where additional housing for older people is provided, location is critical. The emerging policy framework emphasises sustainable locations, access to frequently used services and sustainable transport, together with proper accessibility standards.

9.2 This strengthens the case for prioritising sites where older residents can reach shops, health services, community facilities, public transport and green space without depending on a car.

9.3 It also suggests that, where appropriate, smaller-scale opportunities near well-connected stations could provide climate resilient, accessible and adaptable homes without requiring large new settlements on environmentally sensitive land.

10 The key question for Green Belt release

10.1 The NPPF requires authorities to identify the size, type and tenure of housing needed by different groups. The appropriate sequence from the perspective of meeting housing needs in later life is therefore:

1. **Establish the evidenced need**
2. **Determine what proportion requires specialist accommodation and what can be met through accessible, climate resilient mainstream housing.**
3. **Identify suitable and sustainable locations.**
4. **Consider brownfield, and other previously developed opportunities first e.g. in Enfield, the immediate areas around Crews Hill Station and village (which is demonstrably "grey belt" even though it lies within the Green Belt)**
5. **Assess the potential release of family homes**
6. **Only then consider whether any additional Green Belt release is necessary.**

10.2 This is particularly important because London's housing requirement is already substantial: the SHMA estimates approximately 89,300 new homes a year for 2026–2036. London needs more

homes, but what homes are needed, where they should go and how they can meet the needs of different groups needs further evidence before large swathes of green belt are sacrificed.

11 Why this matters for the soundness of the dLP

11.1 In our view, these evidence gaps raise fundamental questions about whether the dLP is justified and positively prepared.

11.2 We find that the dLP is not justified: the evidence in favour of green belt development cannot be assessed as proportionate, or not, when weighed against the risks of its development to health, food security, drought, subsidence, biodiversity because the latter risks have not been assessed in London's context, or alternatives explored.

11.3 Neither is it positively prepared: because the impact of development on the environmentally protective green belt and, in consequence, on the needs of vulnerable Londoners, living in non-climate resilient (or affordable) homes, in the face of extreme heat has not been addressed. Neither can it be, because the extent of the proposed green belt development is unknown and, such is the enabling nature of the NPPF and dLP, could be almost unlimited.

11.4 The case for green belt development cannot properly be weighed against its environmental and climate risks if those risks have not been assessed in London's specific circumstances.

11.5 The question is not whether green belt development can ever be justified. It is whether the scale and location of such development can be justified by evidence that properly accounts for the risks it creates or for the protection taken away.

11.6 Without understanding the cumulative consequences, it is impossible to demonstrate that the plan is genuinely sustainable over the long term.

11.7 Our conclusion is that the LP is not sound.

12 AfEF recommendations

12.1 The Government and Mayor should commission an independent, London-specific evidence base on the climate-resilience functions of London's Green Belt before the scale and location of Green Belt release is determined.

12.1 The New Towns Strategic Environmental Assessment summarised the impact of CH&CP NT against its strategic environmental objectives. It's a summary but invites further enquiry given the extent of -- across priority risk areas.

Broad Location / Timescale	SEA Objectives										
	1: Air Quality	2: Biodiversity, Flora and Fauna	3: Climate Change	4: Flood Risk	5: Health and Wellbeing	6: Historic Environment	7: Landscape and Townscape	8: Land Use, Geology and Soils	9: Materials and Waste	10: Population	11: Water
Crews Hill and Chase Park											
Short Term	--	--	-	-	--	--	-	-/+	--	-/+	-
Medium Term	--	--	-	-	--/++	--	--	--/+	--	-/++	--
Long Term	+	--/+	-	-	++	--	--/+	--	-	-/++	--

12.2 The Government and mayor should assess the cumulative climate risks of the proposed housing and infrastructure development on economics, health and mortality

12.3 The evidence should underpin an assessment of the **10-year risks** associated with building the 56,100 homes identified in the Strategic Housing Land Availability Assessment (SHLAA) on London's Green Belt, alongside the additional 88,884 (less 56,100 over 10 years) London wide homes per year identified in paragraph 1.19 of the dLP. And, additionally, an assessment of the **20-year implications** of further development that could become possible through later London Plans and the revised NPPF and the continued application of the concept of grey belt.

12.4 The risk assessments should include the 10- and 20-year health and economic consequences of increasing heat (and cold) exposure, particularly for London's ageing population. The SHMA projects that by 2046:

- the population aged 65+ will increase by 50%.
- those aged 75+ will increase by 77%; and
- those aged 80+ will more than double.

12.5 The SHMA also notes that: “Age is strongly correlated with disability” and that 47% of people aged 65 and over report having a disability, rising to 55% among those aged 80 and over.

12.6 This has major implications for the design and location of housing. Climate resilience and accessibility must be considered together.

13 Conclusions

13.1 The evidence available in 2026 has materially strengthened the case for treating climate adaptation, biodiversity, food security, water, extreme heat and nature as core planning considerations, not least for the health, and associated economic consequences, of an ageing population

13.2 The dLP cannot show that its proposed approach to Green Belt development is sustainable without assessing what London's Green Belt currently does for climate resilience, and what protections would be lost through its development**.**

13.3 Neither can it show the impact of “rightsizing” (or its absence) on housing availability or the health and well-being of most of an ageing population who remain in non-climate adapted homes.

13.4 Before further Green Belt development is enabled, London needs evidence capable of responding to these crucial concerns.

13.5 Only then can the London Plan properly reconcile its four Good Growth objectives and show that housing and economic growth are being delivered within the environmental limits on which London's long-term resilience depends

14 AfEF suggested modifications to the draft London Plan

AfEF recommends that The London Plan should

- Use this evidence to consider recognising the Green Belt not simply as land potentially available for development, but also as a **critical part of London's climate and ecological infrastructure**.

- Include Policy HN11 about housing needs for an ageing population, vulnerable (to heat and cold), but not necessarily needing accessible housing (HN9), with guidance on rightsizing opportunities to release affordable and owner-occupied family homes to those who need them.
- Protect the productive function of green land. The policy should make clear how existing farming and horticultural land and other strategically important food-producing green infrastructure will be identified and protected following the removal of the current London Plan's dedicated Policy G8 Food Growing.