



All-Party Parliamentary Group on the Green Belt Call for evidence.

Response by the London Green Belt Council

1. What has been the effect of the abolition of Regional Spatial Strategies and the introduction of the National Planning Policy Framework (NPPF) in the context of the preservation of greenbelt land?

Relatively little. The Government made a lot of it; it was going to remove the top down housing numbers and this would take the pressure off the Green Belt. However, instead we have requirement for a five years supply of housing sites having a similar effect. The requirement for such a supply does not take account of whether the local planning authority's area can reasonably accommodate the number of houses.

Epping Forest, for example, is planning to take land out of the Green Belt to meet perceived housing targets even though the local population growth within the District is relatively small at about 200 people p.a. The clear driver is outward migration from London with 75% of Epping Forest District's inward migration coming from neighbouring Redbridge and a good few more from neighbouring Waltham Forest. But this is a case of "Wants" not "Needs" -- people want to move out because it is a nice green area which has commuter links to London. But there are brownfield sites in Greater London, together with around 78000 empty houses and around 170000 approved planning permissions granted where development has not yet started. It is these "Wants" to live in the Green Belt which will take land out of the Green Belt for housing and destroy the very purpose for which it was created. And 20 years on when another Local Plan has to be put in place all this "growth" will be like compound interest and be justification for the need for more land being taken from the Green Belt for housing.

There needs to be a national strategy for where increases in population should be accommodated. It may not be possible to have a policy for planning to provide housing and jobs just where people want to be; it may be necessary to incentivise a degree of redistribution.

The duty to cooperate which was seen as substituting for regional plans is vague. It is too often resulting in plans being found unsound. Properly used, the duty to cooperate could be a route by which the housing need of a planning

authority with little or no non-Green Belt land to use could be met by a neighbouring authority which had more scope.

2. Which local councils are taking their obligations on greenbelt preservation seriously and which local councils are placing greenbelt land under threat?

We would not want to suggest that any Councils are not taking Green Belt preservation seriously. There are, however, many that are finding no alternative to releasing Green Belt land for development because of population growth (as in the Epping Forest example mentioned above). A recent National Trust survey showed that 51% of Councils with Green Belt envisage a loss in the near future.

Central Bedfordshire is proposing to take more land out of the Green Belt than appears really necessary. Partly, this is as a result of pressure from the adjoining Luton. Some other councils, while generally supportive of the Green Belt are favouring the development of some Green Belt land adjoining previously developed sites in the Green Belt. Examples are Runnymede with the former DERA site and Croydon with Cane Hill hospital.

3. What new policy ideas should be considered to increase greenbelt protection?

The statements of Green Belt policy in the NPPF probably do not need to be modified much.

The most serious threats to the Green Belt arise when Local Plans are being reviewed. The Green Belt section of the NPPF stresses at the outset that the aim of Green Belts is to keep land permanently open and that one of their essential characteristics is permanence. Nevertheless, the NPPF does acknowledge that exceptional circumstances may require a Local Plan review to alter Green Belt boundaries. Policy changes should be directed to trying to ensure that such exceptional circumstances do not arise.

Threats to the Green Belt also arise in the course of development control, when 'very special circumstances' arise which cause a departure from the normal Green Belt policy rules.

Any policy changes should be directed to ensuring that very special circumstances cannot be said to have arisen. The statement in the House by Brandon Lewis MP last July to the effect that unmet housing demand will not

usually constitute very special circumstances is helpful and further clarifications of policy along the same lines would be welcome.

There is a risk that once an inappropriate development has been allowed in Green Belt because of very special circumstances the site will be regarded as brownfield site . Then, if the original special reasons cease to exist, redevelopment may be allowed which is inappropriate in the Green Belt and not justified by special circumstances. Any grant of planning permission for an inappropriate development in the Green Belt should include an informative condition to the effect that the land remains Green Belt and any redevelopment must be appropriate for the Green Belt.

Previously developed sites are often more expensive to redevelop compared with developing open land. Redevelopment of brownfield land should be incentivised – for example by imposing a reduced community infrastructure levy.

The General Permitted Development Order should be revised to ensure that it does not permit any development which would not have been allowed if a planning application had been required. The current proposals for greater flexibility in change of use of agricultural buildings must not make matters worse. If necessary, stricter limits on permitted development in the Green Belt than elsewhere may be needed.

4. Should brownfield land in greenbelt areas have the same protection as Greenfield land in greenbelt areas?

As a broad generalisation, the NPPF provides that brownfield sites in the Green Belt may be redeveloped provided the result does not adversely impact the openness of the Green Belt more than what was there before. While that is an appropriate policy, it is important to distinguish what is genuinely brownfield and what is not.

When the Green Belt was designated there was already some existing development in the area covered. This is genuine brownfield and it is reasonable that the owners can update, modify, and even rebuild provided they do not in the process detract further from the openness of the Green Belt.

There is other development in the Green Belt which should not be regarded as brownfield. First, there are buildings which been allowed because, although they represented inappropriate development in the Green Belt, there were very special circumstances. If the building is no longer needed and the special circumstances no longer pertain, it should not be regarded as a brownfield site

which may be redeveloped. Any redevelopment should be consistent with Green Belt policy. If other redevelopment is allowed, it will result in a steady erosion of the Green Belt.

Second, there is development which was appropriate, but only because it would be temporary. A prime example of this is mineral working. This is regarded as appropriate in the Green Belt, because minerals can only be worked where they are found and because the operation is essentially time limited. It may be tens of years, but eventually the minerals will be worked out and so permissions for mineral working contain conditions for the restoration of the site at the end of its working life. Such sites should not be regarded as free for any sort of development. They should be restored in accordance with the conditions in the permission or, subject to a further planning application, used for some other Green Belt-appropriate use.

5. How can we increase local community engagement in protecting the greenbelt?

Generally speaking local residents, and others from further afield, are very ready to be involved in protecting the Green Belt. The CPRE / Natural England report 'Green Belts: a greener future' in 2010 showed how much the Green Belt is valued by members of the public. The danger is that they will lose heart if they feel that their views are not listened to. Neighbourhood Plans were intended to give people a chance to mould development in their area and give them a sense of ownership. In practice, the requirement that they accord with the Local Plan puts them in a straitjacket when it comes to defending the Green Belt.

It would help if local and national government placed more value on the Green Belt in their pronouncements and if local planning authorities engaged more with parish councils in planning matters.

6. How can it be made clearer to the media the important distinction between 'greenfield' land and 'greenbelt' land- with the importance of greenbelt being highlighted as separate from greenfield.

There is overwhelming public support and, indeed, affection for the Green Belt, it unfortunately means that the media, who always want to sensationalise a story, will use the term 'Green Belt', especially in headlines, when it is inaccurate. The only answer seems to be to stress the difference between greenfield and Green Belt whenever the opportunity arises. It is a good idea to

use capital letters for Green Belt to indicate that it is a reference to an officially designated area and lower case when writing about green fields in general.

Another similar problem with media coverage is a failure to recognise that landscape quality is not a requirement for a Green Belt designation. The media need to be reminded at every opportunity that the purpose of the Green Belt is to prevent urban sprawl and stop settlements coalescing; it does not matter how pretty it is.

7. How do we balance the need to sustain the greenbelt with the need for sustainable communities?

The basis of the NPPF is a presumption in favour of sustainable development and footnote 9 to paragraph 14 makes clear that for development to be considered sustainable, it must be consistent with Green Belt policy. There should not, therefore, be any conflict between sustaining the Green Belt and sustainable development.

One of the arguments sometimes raised against the Green Belts is that, by pushing development beyond the Green Belt, it increases the person-miles travelled in commuting. This need not be so if developments beyond the Green Belt are properly balanced with homes and jobs. Moreover, in London at least, most of the longer distance commuting is by efficient electric trains, whereas, if the Metropolis were allowed to expand into the existing Green Belt, residents would have to travel further to find their relaxation in open country – and these are the sort of journeys which are most likely to be made by car.

8. Should certain areas of greenbelt land be given higher protection than other areas?

There should not be a difference between the way different part of the Green Belt are treated in the development control process. All of the Green Belt should have the same level of protection, but some areas under particular pressure may need more attention.

It may be different when a planning authority is reviewing a Local Plan. If, because of exceptional circumstances, the planning authority has to release some Green Belt for development, then it has to have some way of deciding where that should be. The planning authority should consider how important different parts of the Green Belt are in achieving the aims of the Green Belt as set out in the NPPF.

9. What should the greenbelt look like for the twenty first century?

We are not sure what this means. If it means the look of the landscape, then that is an irrelevant question. It is openness which matters for GB – that is freedom from development. On the other hand if the question means what should it look like on the map, ie what size and shape should it be, then it should not look any different from what it does today. The NPPF makes clear that one of the most important characteristics of the Green Belt should be its permanence. Tinkering with the Green Belt boundaries unnecessarily creates the impression in the minds of developers that anything might be up for grabs. As far as the London is concerned, we agree with the NPPF statements that ‘The general extent of Green Belts across the country is already established.’ and ‘Once established, Green Belt boundaries should only be altered in exceptional circumstances

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