

# Planning for a better future

Our planning manifesto for the government



## Manifesto Background Paper 3

### We need to talk about the Green Belt

The Green Belt has passed its 80th birthday. It is increasingly becoming the Marmite of planning policy: defended and decried in equal measure. The planners who have created and defended the Green Belt over the years take a step back from this highly-charged debate to look at the policy afresh.

## Planning Officers Society

POS is the single credible voice for public sector planners, pursuing good quality and effective planning practice. The Society's aim is to ensure that planning makes a major contribution to achieving sustainable development in ways that are fair and equitable, and achieve the social, economic and environmental aspirations of all sectors of the community. It is within this context that we have set out this advice to Government so we can plan together for a better future.

## POS Manifesto

This started in early 2014 when we looked ahead to the national parliamentary elections in May 2015. The main parties were drafting their manifestos, so we thought about what we could do to help them. This resulted in *Planning for a better future: Our planning manifesto for the next government*. The time since then has seen an unprecedented amount of change to the planning system, so our initial planning manifesto for the next government has morphed into an on-going planning manifesto for government.

These are think pieces that tackle a topical area within planning practice and sets out our recommendations for improvement. They comprise a growing series of Manifesto Background Papers that look in detail at specific issues. Those that are still current are summarised in our main Planning Manifesto paper that sets out the current ask from POS to the government.

The views expressed in these documents reflect the initial view of POS. It is a consensus position. It should not be taken as a final position; rather an informed starting point to debate the issues. It is expected that the recommendations will evolve as the debate progresses.

Where we can, we will work across the sector to craft proposals that have widespread support from the people who operate the planning system at the coalface: land owners, developers, agents, legal, local authorities and politicians. We will be both radical and practical as we look for solutions to tangible problems that will make a real difference to crucial areas. Our objective is to improve the planning system to enable it to deliver its key aim of sustainable development.

Other titles in the series can be viewed from our website.

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## Summary

The Green Belt has passed its 80th birthday. It is increasingly becoming the Marmite of planning policy: defended and decried in equal measure. The planners who have created and defended the Green Belt over the years take a step back from this highly-charged debate to look at the policy afresh. Our key insights are:

- The GB is not an environmental policy
- When introducing the GB with the 1947 Planning Act, the Minister at the time said, “even if ... neither green nor particularly attractive scenically, the major function of the Green Belt was ... to stop further urban development”
- The GB is a spatially constraining strategic policy whose main role is to stop cities from sprawling physically
- Paragraph 83 of the NPPF requires that, once established, GB boundaries should only be altered in exceptional circumstances and then only as part of a review of a local plan as it is a strategic decision on where development should be located
- It seems axiomatic that it is only if the conditions that resulted in the creation of the GB in the first place have changed, that it may need to be rethought
- Those conditions would be that it is now necessary for the urban area to physically grow to accommodate a growth in its population, because all efforts to accommodate that growth within its boundaries have been exhausted
- There are two types of GB review: testing whether the current GB boundaries are correct and reviewing the GB to release sites to meet housing needs
- The application of the five purposes that the GB serves (para 80 of the NPPF) is the way to carry out the former, but plays no useful role in the latter
- The paper sets out a methodology that allows a GB review that is designed to release sites for housing to be carried out.

# 1 Introduction

- 1.1 The Green Belt (GB) is increasingly becoming the Marmite of planning policy: defended and decried in equal measure. However, what is often forgotten is that when it was introduced it was at a time when the population of London was 8.6 million (which it is again now) and there was a need to deal with poor quality slum housing within the metropolitan area and the sprawl of ribbon development in the countryside. The response had several strands, of which the GB was just one. The 1944 Abercrombie Plan also had complementary proposals for a series of New Towns beyond the metropolitan boundary and urban renewal within it.
- 1.2 With London's population back to its record level and a general consensus that we have a housing crisis of significant proportions, the time is right to revisit this policy area in the light of current circumstances. For those who wish to promote development in the GB, there will be calls for it to be rolled back or suggestions that "some bits aren't green so could be built on without causing harm". The other side of this divide leaps to the defence of the GB stressing that it cannot be built on under any circumstances, the consequence of which is that any growth that cannot be accommodated within London should "leap frog" the GB and be built on green fields further out. Of course, there are those who claim that London's growth can be contained within its own boundaries.
- 1.3 This paper tries to take a step back from this highly charged debate to look at the GB afresh. We do not advocate for or against reviewing GBs, just that any debate around the issue should be conducted from a full understanding of this planning policy area and, if a GB review is to be undertaken, it should be done in a way that results in sustainable development patterns. The paper concentrates on the GB around London because it was the first, and the current pressure is particularly acute, but the principles apply to all GBs.

## 2 The origins of GB policy

- 2.1 The recently refreshed and re-launched London Society has produced the first of a new suite of papers called "Green Sprawl: Our current affection for a preservation myth?"<sup>1</sup>. This provides an excellent historical account of the establishment of the GB around London.
- 2.2 The GB was essentially introduced in two main phases: the 1930s inter-war genesis and the post war establishment of the GB as we know it today. It is important to reflect upon the difference between these two phases, because the GB as a piece of public policy substantially changed between these periods.

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<sup>1</sup> [www.londonsociety.org.uk/wp-content/uploads/2014/12/Green-Sprawl-Our-Current-Affection-for-a-Preservation-Myth.pdf](http://www.londonsociety.org.uk/wp-content/uploads/2014/12/Green-Sprawl-Our-Current-Affection-for-a-Preservation-Myth.pdf)

- 2.3 Following much debate during the early decades of the 20thC, in 1935 the London County Council (LCC) started to implement London's GB "to provide a reserve supply of public open spaces and of recreational areas and to establish a GB or girdle of open space" around the capital. The passing of the 1938 Green Belt (London and Home Counties) Act empowered the LCC to start buying land for the proposed encircling park. It was not intended to be continuous, but a series of publically owned green spaces around London for the benefit of Londoners. By 1939 Some 8,000 hectares had been bought, with over 12,000 hectares immediately after the WWII. This land was safeguarded from development, primarily because it was in public ownership.
- 2.4 Following the end of WWII, the 1947 Town and Country Planning Act made provision for GBs. When the GB was finally implemented around London in the mid-1950s it was no longer as a relatively narrow band of publically-owned parks around London, as per the original vision, but rather as a barrier to London's expansion. The Minister at the time indicated that "even if ... neither green nor particularly attractive scenically, the major function of the Greenbelt was ... to stop further urban development".
- 2.5 So the GB, as finally implemented, became an Urban Containment Zone rather than a belt of green, largely publically-owned, recreation land. It was now a much wider zone of any type of land that was to be kept permanently open to prevent London from spilling out into the Home Counties. Over the 1950s and 1960s London's GB expanded so that it now extends to a belt up to 15 miles wide.

### 3 How does GB policy work?

- 3.1 The GB is a spatially constraining strategic policy whose role is to stop London from sprawling physically. That reason still appears in paragraph 79 of the NPPF which says, "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence".
- 3.2 What the GB is not, is an environmental policy targeted at protecting high quality landscapes. Certainly, the GB includes land that is of high quality, and such land would have its own policy protection designations, as well as being GB. But constraining the growth of a metropolitan conurbation by preventing its sprawl, is effectively identifying an "Urban Containment Zone" around that conurbation, so that any development within that zone that would result in the city spreading can be stopped to keep it permanently open. To do this all such land, green or brown, high and low quality, must be identified including existing settlements, because to do otherwise allows the very sprawl that the policy is trying to prevent.
- 3.3 It is vital that this fundamental position is not lost. It doesn't matter what condition land within the GB is in, that does not undermine its fundamental role to prevent urban sprawl by being kept permanently open. Land within the GB is not protected for its landscape qualities and the GB should not be treated as such. Openness is not the same as landscape character.
- 3.4 Paragraph 80 of the NPPF sets out the five purposes that the GB serves:
- 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; and
  - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.5 Within the context of the overall aim of preventing urban conurbations from sprawling, these purposes are all logical consequential purposes from a policy that keeps a zone around a conurbation permanently open. They are not the essential justifying aim of the policy but the outcome based purposes that should flow from the successful application of that policy.
- 3.6 Paragraph 81 of the NPPF encourages local planning authorities to plan positively to enhance the beneficial use of the GB once it has been defined. This is of course a sensible follow-on response to a situation where a large zone of land around a conurbation is being kept permanently open.
- 3.7 To summarise, GB policy was introduced because successive governments decided 80 or so years ago that the nation did not want the urban sprawl that was a feature of inter-war development to continue and the character of our countryside to be lost. It was around 60 to 70 years ago that the response was formalised and the GB became fully formed. The aim of preventing urban sprawl will be achieved by keeping this area of land permanently open and free of most development. LPAs are encouraged to make the most of this protected land, insofar as they are able, for the benefit of the wider community.

## 4 What circumstances would justify a GB review

- 4.1 Paragraph 83 of the NPPF requires that, once established, Green Belt boundaries should only be altered in exceptional circumstances and then only as part of a review of a local plan as it is a strategic decision on where development should be located. It is essential that a clear signal on this is sent to the market for an urban containment policy approach to be successful. It should not matter whether a site is greenfield or brownfield, in good or poor condition. Neither should be a justification to allow new unacceptable development in the GB. This has been a central feature of the policy and must remain so.
- 4.2 So, what circumstances would justify rethinking the boundaries and extent of the GB? It seems axiomatic that it is only if the conditions that resulted in the creation of the GB in the first place have changed, that it may need to be rethought? Those conditions would be that it is now necessary for the urban area to physically grow to accommodate a growth in its population, because all efforts to accommodate that growth within its boundaries have been exhausted.
- 4.3 This is no easy decision. It should only arise after all reasonable and acceptable efforts have been taken to maximise the amount of development within the urban area. Optimising densities and ensuring that all land is appropriately used must be the first response to growth. This would include a review of employment land and other areas or uses that are protected by planning policies, commensurate with ensuring a proper balance between residential, employment and other uses. Similarly, it should also only arise after other options, such as the growth being accommodated in other areas in ways that do not result in unsustainable patterns of growth, have been fully explored.

- 4.4 If the point is reached where the capacity of the urban area has been maximised and there are no other deliverable options, then a political decision must be taken: is it right to continue to seek to accommodate the growth that is taking place? The impact of not accommodating growth will need to be fully understood and carefully considered.
- 4.5 If the answer is yes, then those exceptional circumstances envisaged in the NPPF will exist and a LPA should carry out a review of its GB as part of the development plan process.

## 5 How should you do a GB review

- 5.1 If a decision is taken to accommodate the growth of a conurbation by expanding its boundaries, then POS considers that this should be done in a way that delivers the aims of the NPPF particularly with regard to sustainable development and the provision of supportive infrastructure.
- 5.2 We do not suggest allowing untidy, but isolated sites to be released if they result in development that does not meet the aims of sustainable development as envisaged in the NPPF. Similarly, an approach to a GB review that just focuses on land that does not deliver the five GB purposes (NPPF para 80) is also not considered to be the right approach. The release of GB land is a strategic decision that has been taken because an urban area needs to expand or any entirely new location is identified, based on an assessment of sustainable locations for new development. In those locations, the case for new development will normally outweigh the purposes of the GB in those locations. Revised GB boundaries may need to be considered in relation to the new development locations so that the resulting new GB can function successfully.
- 5.3 For these reasons, POS considers that the methodology that we set out below is the right approach to a GB review.
- 5.4 It is important to identify areas that can be developed in a sustainable way. This will essentially be identifying transport nodes along high capacity public transport corridors that have the capacity, or the potential to economically create the capacity, to take additional journeys into the centre of the conurbation or other areas of significant economic activity. The growth of communities around these train, tube and tram stations will be a key feature of a GB review release strategy.
- 5.5 In reviewing the GB, it is important to understand the intrinsic quality of the land in terms of SSSI, SNCI, Heritage, alongside high quality landscape (AONB, SLA etc) and other features. The need is to understand the relative qualities of land so that informed decisions can be made about the acceptability of release. It is important to accept that the character of some landscapes will change in this process, so understanding the relative merits of landscape quality will be vital
- 5.6 A GB review would also involve a review of all such similarly protected land to test what is the most appropriate land to release. In London, this would include Local Green Space, Metropolitan Open Land and GB. For the first two, it would be an exercise in ensuring that areas remain well served by public open space, but looking carefully at areas where there may be an overprovision. Given a need to grow the conurbation, it is necessary to consider the use of all land within the conurbation to ensure that the most effective and efficient use of land is achieved.

- 5.7 Once all these factors are captured, spatial areas will emerge with the greatest potential for development in the most sustainable way. A new GB area will also emerge out of this process, which in some circumstances will need to be expanded to address the released development sites within it.
- 5.8 Consideration should be given to whether the NPPF and/or NPPG need to be amended to make it clear that this is the right approach to a GB review.

## 6 How should a GB review be implemented?

- 6.1 This would depend on the scale. A need to accommodate 2,000 homes will clearly be a very different project to 20,000 homes for an individual local planning authority. A large release will inevitably involve a greater mix of uses.
- 6.2 Given the need to ensure that development is sustainable and well served by infrastructure, POS considers that the use of the New Towns approach to compulsorily acquiring land so that the value uplift can be captured and used to fund infrastructure provision to be necessary, particularly where the need is for a large extension.
- 6.3 TCPA recently published a paper called “New Towns Act 2015?” which clearly sets out what is needed to enable this to happen. POS strongly supports this methodology, as it offers a tangibly different approach to major new residential development that enables us to tackle most community’s main and understandable concern against new development: that it will put pressure on already stretched services.
- 6.4 The winners of the £250,000 Wolfson Economics Prize, David Rudlin and Nicholas Falk of Urbed, followed a very similar approach. They advocated that Britain’s housing crisis could be largely solved by doubling the size of 40 towns and cities using garden city extensions. There is no reason why this approach could not be used to extend London, the largest city conurbation, as well as towns and smaller cities, like Oxford.
- 6.5 A combination of a sustainable approach to site selection and land value capture to fund infrastructure is a qualitatively different approach that will have much to commend to local communities who are likely to find these changes difficult to accept.

## 7 Conclusions

- 7.1 It is important that as planners we use our skills to bring the right perspective to addressing the nation’s housing crisis. The solution will be complex, long-term and across a myriad of fronts. It is inevitable that the question of whether there is a need to review GBs will be part of this. In making that decision it is important to consider the GB properly and to cut through the passion that often surrounds it. We advocate approaches to GB reviews and the release of GB land that result in development that has high levels of sustainability and can be properly served by the necessary infrastructure, particularly public transport. We do not underestimate the difficulties of a GB review, but if it is necessary to carry one out we need to ensure it is done well.