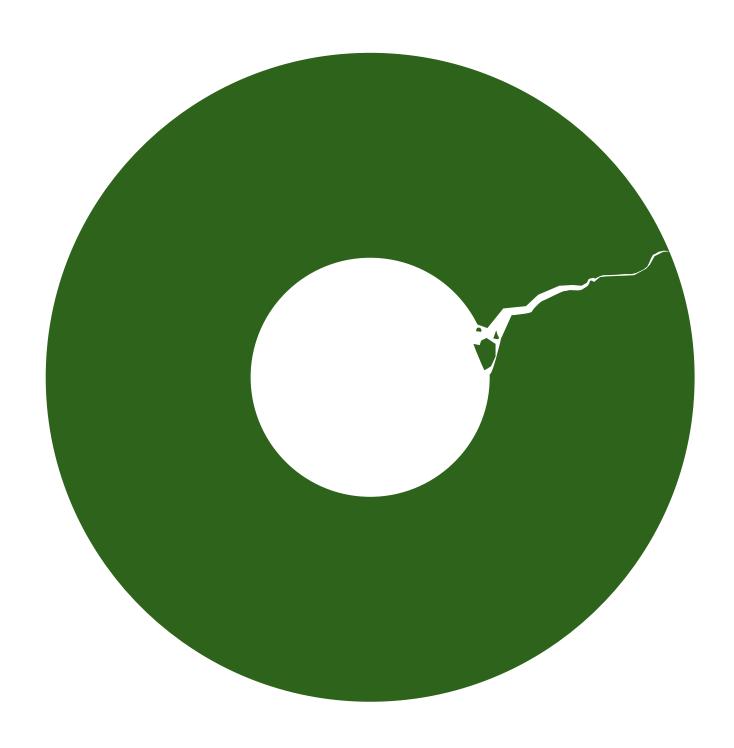
The future of the Green Belt

A Landscape Institute member consultation





"A growing band of economists and geographers have been arguing the Green Belt is no longer fit for purpose and that it should be opened up for housing development. The argument is based upon a chain of assertions and purports to be based upon sound economic arguments and empirical evidence – all of which are questionable, and some of which are wrong."

Professor Dieter Helm, Chair of the Natural Capital Committee "As proposed by the original visionaries of town planning—most notably Ebenezer Howard—Green Belts would be an extensive ring of parkland surrounding towns in which citizens could walk their dogs, stroll with their children and exchange civilised gossip in the shade of handsome trees. What they have turned into is a combination of sacred cow and juggernaut: unstoppable in the damage they do to the housing market and beyond criticism in the popular media."

Paul Cheshire, London School of Economics

"There's no need to build on the Green Belt... there's plenty of land that's not Green Belt that we can build on that is suitable for housing and we need to get on with it."

> Sajid Javid MP, Secretary of State for Business, Innovation and Skills

"It is untrue that the Green Belts are areas of outstanding amenity. They are rather sources of increasing misery, as an ever-larger population is crammed into an artificially limited space. This is a really big issue. That is, of course, why no politician dares touch it."

> Martin Wolf CBE, Financial Times

"When we lose open Green Belt land, we lose more than just a view, a space to run or play, an easy escape from the city or valuable farmland. We lose land that has its own identity and plays its own role in England's heritage.

Green Belt land is important for our wider environment, providing us with the trees and the undeveloped land which reduce the effect of the heat generated by big cities. Instead of reducing this green space, we should be using it to its best effect."

CPRE

"The Green Belt has been exalted as sacrosanct in a way in which almost no other policy area has been indulged, and any attempts to have a serious conversation about its development have been swiftly stifled ... any business or individual feeling constrained as a result of the current housing crisis has every right to feel short-changed by the political debate around the Green Belt, and by the ongoing inertia afflicting all parties, which is preventing decisive action being taken. It's time for a sensible conversation about the green belt."

Andrew Carter, Centre for Cities

Why do we need to talk about Green Belt?

"Together with our human capital, land is possibly the UK's greatest asset. It provides the basic services that we need to prosper and flourish, the environment in which we all work and live our lives, and it forms the historical and cultural bedrock of the country... However, our land is a finite resource, and it is set to come under increasing pressure as the century unfolds. Factors such as climate change, demographic shifts, and changing patterns of work and habitation will all create major challenges. Also, as these pressures intensify, so will the demands we make on our land. Deciding how to balance these competing pressures and demands is a major challenge for the coming century, and one that is all the more pressing due to the time that may be needed to roll out new land use policies¹."

Professor Sir John Beddington, former Chief Scientific Adviser to the UK Government

This extract from the forward of the Foresight report, Land Use Futures, highlights the need for a rational approach to land use in light of ever increasing pressures on a limited resource. Green Belt policy is not immune from scrutiny, particularly in the context of demand for land in London and the south east of England, and in the last few years the concept has been the subject of increasing attention. This is perhaps understandable given that 12.4 per cent of land in England carries the designation. The housing shortage in parts of the country is one of the key factors spurring debate about Green Belt, and whether it is time for a review of policy governing its use and designation. ²

Opinions range from criticism that Green Belt is in fact a "green noose" ³ preventing the development of much needed housing, to praise for the benefits it delivers for the wider environment and demands for Green Belt land to be "cherished and protected permanently" ⁴. Others criticise the ongoing reluctance of decision makers to at least consider a review of policy:

"Policymakers refuse to look at Green Belt policy because of the status it has in the national psyche. No other planning policy is so lauded whilst being so misunderstood...It would take a brave government to propose a radical change to Green Belt policy. But not to face the issue, whilst still lamenting the lack of housing supply, is untenable." 5

Largely absent from the debate is the voice of the landscape profession – a profession which understands the arguments for and against building in the Green Belt, which understands the natural and human processes affecting land and how to make best use of this limited resource. This consultation intends to address this by seeking the views of Landscape Institute members to ensure that as the debate around Green Belt develops, the landscape profession is heard. The focus of this discussion document is on the system in England and the debates that have been taking place within the context of English planning policy. While it is recognised that different policies are in place across the UK, feedback is encouraged from all members of the Landscape Institute wherever they are based and operate as this is a debate which is fundamentally focussed on whether or not Green Belt is an effective way of planning land use in any context.

History of the Green Belt

The primary aim of Green Belt policy is to prevent urban sprawl by ensuring that land between settlements remains permanently open. Legislation supporting this was introduced in the first half of the 20th century, although the concept is not new. In the 1600s the economist and philosopher Sir William Petty proposed the designation of a Green Belt two miles from the centre of London, and in 1829 John Claudius Loudon envisioned Green Belts as a tool to help shape the growth of cities. Subsequent proponents of the concept included, of course, Ebenezer Howard (1890), the Town and Country Planning Association (1919) and Raymond Unwin (1929).

It was not until the early part of the 20th century, with the growth of suburban populations, that the concept gained the support necessary to lead to the introduction of powers to curtail the sprawl of cities. The Green Belt (London and Home Counties) Act 1938 was designed to enable local authorities to buy land and retain it as open Green Belt. In the years following the Second World War there was a growing need to properly control the development of land; the response to which was the Town and Country Planning Act 1947. The Act enabled local authorities to designate land within their local development plans as Green Belt. This was designed to be a more viable alternative to the increasingly unsustainable option of purchasing land, as introduced by the Act of 1938. 1955 saw the publication of the historic Circular 42/55, in which the then Minister for Housing and Local Government, Duncan Sandys stated that:

"I am convinced that, for the wellbeing of our people and for the preservation of the countryside, we have a clear duty to do all we can to prevent the further unrestricted sprawl of the great cities."

 $^{1 \}qquad \text{For esight Land Use Futures Project (2010), Final Project Report. The Government Office for Science}. \\$

² https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2012-to-2013

³ http://www.adamsmith.org/research/reports/the-green-noose/

⁴ http://www.cpre.org.uk/what-we-do/housing-and-planning/green-belts/the-issues

⁵ http://www.peterbrett.com/a-country-hung-by-its-own-green-belt

Circular 42/55 encouraged local planning authorities across the country to consider designation of Green Belts in order to:

- Check the further growth of a large built-up area;
- Prevent neighbouring towns from merging into one another; or
- Preserve the special character of a town and prevent the loss of identity and sense of place of settlements.

In 1988, Planning Policy Guidance 2 was issued, which reaffirmed the Government's commitment to the Green Belt principle, and added a requirement to take account of sustainable development. This was replaced by PPG2 published in 1995 and subsequently amended in March 2001.

Green Belt policy today

Following the planning reforms undertaken by the Coalition Government, Green Belt policy is now enshrined in the National Planning Policy Framework (NPPF). In broad terms, the NPPF states that the protection of Green Belt should be considered a core land-use planning principle, underpinning both planmaking and decision-taking. Chapter 9 elaborates on this principle, explaining that:

"The Government attaches great importance to Green Belts. 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."

The NPPF then explains in greater detail the five interrelated purposes to be served by Green Belts. Paragraph 80 states that these are:

- To check 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.

Local planning authorities are encouraged to 'plan positively' to enhance the Green Belt. Paragraph 81 describes what this might entail, including improved access, greater biodiversity and enhanced visual amenity. The NPPF explains that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

The idea of 'exceptional circumstances' applies equally to the designation of new Green Belt, with the NPPF stating that these might include the planning of larger scale developments such as new settlements or major urban extensions.

Impact of Green Belt policy and current debates

Green Belt policy has been largely successful in terms of meeting its objective to contain the growth of those towns and cities where the designation exists. Today, there are 14 separate areas of Green Belt, covering 12.4 per cent of England. Official statistics on changes to the extent of Green Belt are available dating back to 1997, and these indicate a general increase in the area of Green Belt up until the latest statistical release (2013/14)6. Comparisons between 2012/13 and 2013/14 do however show a decrease of 540 hectares in Green Belt land, equating to 0.03 per cent of the total.

There are concerns that this relatively stable picture is under threat. CPRE analysis of draft and adopted local plans suggests that, as of March 2015, almost 220,000 houses are proposed for development on Green Belt land. In some instances local authorities have claimed that the need for economic growth constitutes an 'exceptional' case, justifying development on Green Belt. The report concludes that the amount of housing development planned for Green Belt land is at its highest since the introduction of the National Planning Policy Framework and that national planning and land use policy needs strengthening to prioritise development of suitable brownfield sites.

Urban sprawl and the loss of openness, the primary objectives of Green Belt policy, are not the only concerns raised by CPRE. The organisation highlights what it sees as the additional gains from the protection of land against development; the implication being that these are under threat:

"Green Belts provide countryside close to 30 million people and give a range of benefits, including 30,000 km of public rights of way, 250,000 hectares of best quality agricultural land, 89,000 hectares of Sites of Special Scientific Interest (SSSIs) and 220,000 hectares of broadleaf and mixed woodland. Many of these benefits have increased over time and the protection against development afforded by the Green Belt designation will have played a critical role in this."

The concerns of those in favour of Green Belt, such as the CPRE, have been heightened by arguments emerging in recent years that it is time for policy to be reviewed in light of perceived or real negative consequences, however unintentional. These include:

- a. Green Belt policy as a contributing factor towards the housing shortage;
- b. The impact of intensifying development in those towns and cities constrained by Green Belt; and
- c. The environmental quality of Green Belt land.

Department for Communities and Local Government (2014) Local Planning Authority Green Belt: England 2013/14

CPRE (2015) Green Belt under siege: The NPPF three years on.

a. Green Belt policy as a contributing factor towards the housing shortage

In particular, Green Belt policy has been singled out by many as a barrier preventing the development of housing. A report published by the Adam Smith Institute argues that by limiting the supply of land for development in areas where demand is greatest, Green Belt policy has led to inflated house prices and rents. The report suggests that the 2.5 million new homes needed in the next ten years could be built on just two per cent of England's Green Belt, and that only 3.7 per cent of the London Metropolitan Green Belt would need to be released to build one million new homes.

Paul Cheshire, Emeritus Professor of Economic Geography at the London School of Economics (LSE), believes that cities are being 'strangled' by Green Belt and that they are the driving force behind the current housing shortage. His proposal is:

"...selective building on the least attractive and lowest amenity parts of Green Belts. Not only are they close to cities where people want to live but only a tiny fraction of their vast extent would solve the crisis of housing, housing land and housing affordability for generations to come."9

A recent report from London First, co-authored by the Spatial Economics Research Centre (SERC) at the LSE and planning consultancy Quod, concluded that:

"London's boroughs should be encouraged to review their Green Belt and consider how the land within it can be most effectively used and what the options are for redesignating a small fraction for new homes." ¹⁰

However, a recent report ¹¹ from the CPRE concluded that a minimum of 976,000 new homes could be built on identified brownfield sites. The report was based on research undertaken by the University of the West of England, which analysed data submitted by local planning authorities since 2010 to the National Land Use Database of Previously Developed Land. The report concedes that some brownfield sites will not be appropriate for development for a variety of reasons including site conditions, biodiversity, cultural importance or poor location. However the researchers have factored these exceptions into their analysis.

b. The impact of intensifying development in those towns and cities constrained by Green Belt

Some have levelled criticism at Green Belt policy and its negative impacts on towns and cities. Tom Papworth, for example, believes that the densification required of towns and cities surrounded by Green Belt puts greater pressure on open spaces, valued more highly by local populations than 'distant Green Belts'¹².

Wildlife and Countryside Link (while not explicitly in the context of debates on Green Belt) have also highlighted the importance of some brownfield sites as havens for wildlife, stating that two of the UK's top sites for wildlife diversity are brownfield land and support some of the UK's most scarce and threatened species¹³. The group goes on to explain that in many towns and cities, brownfield sites may be the "sole semi-natural green-space available and the only option for the local community to connect with nature."

Fields in Trust is a charity whose aim is to safeguard recreational spaces, believing that local outdoor space close to people wherever they live is vital, but under threat from development. In its policy statement on brownfield sites and the Green Belt, the charity states that:

"...the importance of, and pressure on, land for sport and play in urban areas is such that they must be protected from development in the most robust manner."

c. The environmental quality of Green Belt land

The conclusion of the London First publication is supported by analysis undertaken to inform the report, which found that:

- 7.1 per cent of London's Green Belt is golf courses, representing almost two and a half thousand hectares;
- 59 per cent of Green Belt around London is agricultural land;
- 60 per cent of London's Green Belt is within 2km of existing rail or underground stations; and
- Publicly accessible land and land that has environmental designations accounts for just 22 per cent of Green Belt around London.

Arguments that favour some development on Green Belt are often augmented with additional points that question the environmental quality of the land. While acknowledging that the designation is designed to prevent urban sprawl, they seek to dispel what they see as common misconceptions, a response to some of the arguments of those in favour of Green Belt protection:

"...people believe that Green Belts are good for the environment. Quite the opposite is the case. Over a third of Green Belt land is devoted to intensive agriculture and is actively harmful to the environment: soaking fields in herbicides and pesticides creates not a rural idyll but a sterilised wasteland... domestic back

⁸ Papworth, T. (2015) The Green Noose: An analysis of Green Belts and proposals for reform. Adam Smith Institute. London.

http://blogs.lse.ac.uk/politicsandpolicy/greenbelt-myth-is-the-driving-force-behind-housing-crisis

¹⁰ London First, SERC, Quod (2015) The Green Belt: A place for Londoners?

 $^{11 \}quad \text{CPRE (2014)} \\ \text{From wasted space to living spaces: The availability of brownfield land for housing development in England.}$

² http://www.conservativehome.com/thinktankcentral/2015/01/tom-papworth-loosen-the-green-belt-and-solve-the-housing-crisis.html

 $^{13 \}quad http://www.wcl.org.uk/docs/Guidance \% 20 for \% 20 brown field \% 20 land \% 20 of \% 20 high \% 20 environmental \% 20 value. pdf with the first of the first o$

Fields in Trust (2015) Policy Statement: Brownfield Sites and the Green Belt.

gardens are far more biodiverse than farms. Meanwhile, displacing development to exurbs and dormitory towns beyond the Green Belts requires more land to be devoted to transport infrastructure and lengthens commutes, thus increasing pollution and greenhouse gas emissions." ¹⁵

Very few studies appear to have been undertaken which either corroborate or refute such assertions. In 2010 however the CPRE and Natural England issued a report¹⁶ which found that:

"Green Belt land is contributing to healthy ecosystems which underpin many natural processes supporting a range of services including pollination, soil fertility, flood defence, air filtration and carbon capture and storage. With the Green Belt designation it is likely that a proportion of this land would have been lost to urban development and associated infrastructure."

The report does acknowledge however that in light of new challenges in the 21st century, a green infrastructure approach to land use, which seeks to deliver multiple benefits from the same land resource, will be required of Green Belts:

"With new challenges presented by climate change, along with additional pressure for new housing in the future, the Green Belts and all urban fringe land surrounding towns and cities could take on an even more significant role in providing an environmental resource for England's population. A multifunctional approach to land use is essential to combine the range of activities—such as production of local food, educational visits, access for recreation and provision of sustainable energy."

The idea of demanding more from the Green Belt land has been resurrected by Professor Dieter Helm, Chair of the Natural Capital Committee. In a recent paper 17, Professor Helm seeks to discredit the arguments made for releasing Green Belt land for housing development, particularly where these have focussed on both the poor environmental quality of the land and the need to accommodate an increasing population. In doing so, he concludes that:

"There is a viable third alternative that at least deserves proper analysis...imagine a Green belt with lots of natural capital, a much more environmentally benign agriculture, much greater public access, woodlands located next to people so it could fulfil not only the original purpose of limiting the sprawl but also provide the lungs of the cities, the fresh air for children to play in, and the recreational benefits which are crucial to health and wellbeing. That is worth exploring before the irreversible destruction of this major asset located exactly where it is needed – next to people."

 $^{15 \}quad \text{http://www.conservativehome.com/thinktankcentral/2015/01/tom-papworth-loosen-the-green-belt-and-solve-the-housing-crisis.html}$

⁶ CPRE, Natural England (2010) Green Belts: A greener future

¹⁷ Professor Dieter Helm (2015) In defence of the Green Belt.

Conclusion

Circular 42/55 from Duncan Sandys MP was unambiguous in its support for the prevention of urban sprawl as a means of ensuring the wellbeing of the population and the preservation of the countryside. It was this circular that encouraged local planning authorities across the country to consider designation of Green Belts. Now sixty years on, in light of new challenges, circumstances and knowledge, is it time for a review of policy?

Statistics show that Green Belt policy has largely been successful in preventing the coalescence of settlements. But is this single-issue designation a luxury we can no longer afford? Increasingly well-evidenced demands for our land to perform a range of functions - housing, recreation, biodiversity, flood management, energy and food supply and climate change mitigation and adaptation to name but a few-could suggest it is no longer viable to set aside 12.4 per cent of England's land with the objective of preventing urban sprawl, regardless of the incidental benefits that Green Belt enables in certain locations. Green Belt policy came before a proper understanding of concepts such as green infrastructure, ecosystem services and natural capital. So is now the time to undertake a review? Or are concerns justified that a review of Green Belt policy could lead to uncontrolled development that undermines one of the country's longest-serving planning policies? After all, a CPRE survey¹⁸, published to celebrate the 60th anniversary of the 1955 circular found that 64 per cent of respondents agreed that Green Belts should be protected. Perhaps conscious of this public support, the Conservative government gave a clear commitment in its manifesto to retaining Green Belt policy as it stands, with David Cameron stating in the run-up to the General Election that:

"When it comes to our Green Belt, I have been clear...The line remains scored in the sand – that land is precious." 19

This strong support from politicians and the public for retaining the status quo begs a number of questions. The first relates to the creation of new Green Belt. Paragraph 82 of the NPPF is clear that new Green Belt should only be established in exceptional circumstances. Does this imply that Green Belt policy is not the best way of planning land use? Indeed, other towns and cities across the country have prevented urban sprawl despite not having Green Belt policies in place.

Secondly, if Green Belt is as valued as it appears, should it not be subject to improved planning and management? Should there be a requirement introduced that management plans are prepared for England's Green Belts, as is the case for its Areas of Outstanding Natural Beauty and National Parks?

Thirdly, the designation of Green Belt was left to individual strategic planning authorities. Some chose to make use of this power, others did not. This freedom has meant that there is no national discipline where the designation is used nor is there consistency in how it has been used. Do we need a better coordinated national policy, which could include the opportunity for newly created Green Belt? Furthermore, could a better coordinated policy be part of a wider review of land use leading to a nation-wide land use strategy?

These issues, and more, need to be considered by members of the Landscape Institute. While mindful that any public statements do not compromise the ability of our members to undertake their work, it is necessary to ensure that the voice of the landscape profession is heard as part of the debate currently taking place, one that will no doubt continue in years ahead.

¹⁸ http://www.cpre.org.uk/media-centre/latest-news-releases/item/4033-60th-anniversary-poll-shows-clear-support-for-green-belt

¹⁹ http://www.telegraph.co.uk/news/earth/hands-off-our-land/11444802/David-Cameron-l-am-a-countryman-and-l-will-protect-the-Green-Belt.html

Ouestions

Please respond to the following questions **online** by **Friday 29 January** by visiting: www.landscapeinstitute.org/policy/future-of-green-belt

1 Do you agree with the following statements?

"There's no need to build on the Green Belt... there's plenty of land that's not Green Belt that we can build on that is suitable for housing and we need to get on with it."

Sajid Javid MP, Secretary of State for Business, Innovation and Skills

"When we lose open Green Belt land, we lose more than just a view, a space to run or play, an easy escape from the city or valuable farmland. We lose land that has its own identity and plays its own role in England's heritage. Green Belt land is important for our wider environment, providing us with the trees and the undeveloped land which reduce the effect of the heat generated by big cities. Instead of reducing this green space, we should be using it to its best effect."

CPRE

"It is untrue that the Green Belts are areas of outstanding amenity. They are rather sources of increasing misery, as an ever-large population is crammed into an artificially limited space. This is a really big issue. That is, of course, why no politician dares touch it."

Martin Wolf CBE, Financial Times

- 2 Do you support the current national and local planning policies that seek to ensure that all Green Belt land remains open in perpetuity?
- 3 What is the unique contribution that the landscape profession can add to the Green Belt debate?
- 4 What aspects of the current debate are absent that the Landscape Institute ought to consider?
- 5 Do you agree that the Landscape Institute should promote a national debate around the social, environmental and economic costs and benefits of current Green Belt policy?
- 6 Do you agree that the Landscape Institute should, as part of the debate, promote examples of good practice in terms of the planning, design and management of land within Green Belt? For example, where green infrastructure with public access has been created, landscape character and quality and/or biodiversity have been improved, or well-designed built development has been assimilated?
- 7 Do you agree that the Landscape Institute should publish a definitive policy position statement on Green Belt policy? If yes, what proposals would you like to include?
- 8 Can you suggest three concepts/policies the Landscape Institute could promote on Green Belt?
- 9 What do you think Green Belt policy should seek to deliver and how could this be acheived?

- 10 Can you share good examples that either demonstrate how the landscape and environmental quality of protected Green Belt land can successfully be preserved, or illustrate how, in some circumstances, the release of Green Belt land and the introduction of sustainable forms of development can lead to landscape and environmental improvements?
- 11 The Landscape Institute welcomes ideas for original thinking on Green Belt policy from all members. Do you have any additional arguments, evidence of research, points of view that that you would like to be considered as part of the debate?
- 12 Have you been involved in campaigns or paid/unpaid work to support Green Belt protection, or to support built development in Green Belt, or both/neither?
- 13 What do you consider to be the biggest benefit of the Green Belt?
- 14 The Landscape Institute is planning an exhibition in conjunction with the Building Centre and therefore would like to gather ideas for original thinking on Green Belt that are presented visually. If you would like to send supporting documentation this would be welcome.
- 15 Please add any further comments.

For further information, please contact Stephen Russell, Head of Policy: Stephen.Russell@landscapeinstitute.org

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Landscape Institute 107 Gray's Inn Road London WC1X 8TZ

020 7685 2640

www.landscapeinstitute.org @talklandscape

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