EXECUTIVE SUMMARY

1. The aim of Green Belt policy – to prevent urban sprawl by keeping land permanently open – is more relevant today than when the original policy guidance was issued in 1955. This is especially true because periodic reviews of Green Belt boundaries, through the local plan process, provide no certainty on the future of the Green Belt. And national planning guidance in the National Planning Policy Framework (NPPF) requires the planning system to secure environmental, social and economic benefits, which Green Belt policy fails to achieve.

2. Open land is a finite and irreplaceable asset in the UK. The Landscape Institute urges people to move away from the idea that Green Belt is good simply because it is there. If redefined as natural capital, green infrastructure or strategic open space, the transformation and enrichment of Green Belt land could deliver far greater benefit than the current ‘spatial separation’ designation.

3. The original policy predates the current imperative in the National Planning Policy Framework (NPPF 2012) for sustainable development. Green Belt designation was neither adopted evenly across the country nor applied consistently. There is also a pressing need to secure multi-functional outcomes from land, especially from land close to urban areas, to meet the government’s policy on health and wellbeing.

4. Green Belt policy, in its current format, fails to reflect the advances that have been made since the 1950s in a range of planning services. For example, the advent of digital technology, such as geographical information systems and remote satellite sensing, has given us the ability to examine, understand, analyse and plan for development in a way that was not possible when the concept of ‘Green Belt’ was introduced.

5. The Landscape Institute is committed to placing landscape at the heart of the current debate, embedding landscape principles into planning practice, and promoting a wider understanding of the value, function and long-term management of Green Belt land across the UK.

6. Our intended approach will be to:
   - raise public awareness of Green Belt issues;
   - provide clarity and factual evidence to enable informed choices to be made;
   - contribute to or lead the debate on the future of Green Belt;
   - encourage more effective cross-professional, sector and agency working in Green Belt locations; and
   - collaborate with partners to secure a sustainable future for Green Belt land.

7. The Landscape Institute will call on the UK government to undertake a strategic review of Green Belt policies and guidance as part of the proposed (2018) revisions to the National Planning Policy Framework and National Planning Practice Guidance.

   It will also call on the Welsh Government to undertake a strategic review of Green Belt policies and guidance as part of the proposed revisions to Planning Policy for Wales. And it will call on the Scottish Parliament to undertake a strategic review of Green Belt policies and guidance as part of the passage of the Planning Bill and as part of the review of Scottish Planning Policy and National Planning Framework 4.
INTRODUCTION

The success of the UK planning system, in retaining the distinction between town and country, should be celebrated. Green Belt is acknowledged internationally as an excellent demonstration of best practice in land use planning. It has prevented many towns and cities from sprawling across open countryside, and has kept land on the edge of settlements permanently open and available for agriculture, forestry, recreational and educational purposes.

However, there are widespread inconsistencies amongst the public and policy-makers in their understanding of what Green Belt is, and what it is for. Green Belt has become a controversial topic, generating many apparent contradictions and disagreements on planning for housing development and perceived or real threats to the permanent ‘openness’ of the Green Belt.

The conflict between development and Green Belt openness has been a constant theme throughout the history of the policy. However, current housing need is such that the Green Belt is potentially more vulnerable to erosion and mis-management today than that at any other time. As much of Green Belt land is in private ownership, public authorities are unable to exercise any control over the way in which it is managed.

Green Belt policy pre-dates NPPF 2012 presumption in favour of sustainable development and was not revised or updated at the time the NPPF was adopted. Thus, as a single-issue designation, Green Belt does not sit well with current evidence-based policy-making and decision-making. The proposed revision to NPPF (2018) provides an opportunity for government to update NPPF and to align Green Belt policy with current planning guidance.

Critically, many emerging local plans are proposing the release of land from the Green Belt, but there is no best practice or nationally accepted procedure for undertaking Green Belt boundary reviews using a ‘standard’ methodology for consistency. In our view, any local Green Belt review should take account of the range of planning mechanisms that are available to protect and enhance the potential functionality of Green Belt land.

In spite of the legal ‘Duty to Cooperate’, Local Plans rarely take a regional/sub-regional overview when planning for sustainable patterns of development. As a result, most Green Belt reviews tend to focus on the performance of individual ‘parcels’ of land as Green Belt, rather than the principle of Green Belt as a strategic instrument for shaping the sustainable growth of settlements. Such studies therefore point towards piecemeal minor changes to Green Belt boundaries and consequently, locally designed methodologies are frequently subjected to lengthy interrogation at Local Plan examinations. This can lead to inconsistent decision-making and the fragmented, piecemeal development of some areas of Green Belt, whilst other areas remain sacrosanct.

The Landscape Institute and its members believe that Green Belt policy has been highly effective in meeting the original aim of maintaining the openness and permanence of Green Belt land. However, as with any national policy, there is room for improvement as circumstances change; we believe that now is the time for such a review.
PURPOSE AND SCOPE

It is important to shift the debate away from entrenched pro- and anti-development positions. Instead we propose to identify options for the future of Green Belt that have not yet emerged from the current polarised debates.

Landscape is dynamic, ever changing to meet the needs of society, and landscape practitioners are uniquely qualified to manage that change.

We believe that more public information is needed to address common misconceptions of Green Belt and promote a better understanding of the principles of sustainable living.

This briefing paper will:

• provide clarity around the purpose of Green Belt;
• deal with common misunderstandings;
• consider opportunities for new approaches to planning in Green Belt locations; and
• work with partner organisations to call for a strategic review of Green Belt policy and guidance.
GREEN BELT EXPLAINED

Why is Green Belt designated?

Green Belt is a national planning policy in the UK, initially adopted to control the rapid growth of post-war housing estates around existing towns. The London Metropolitan Green Belt was first proposed in 1933. Circular 42/55, released by the government in 1955, encouraged local authorities to establish their own Green Belts (see Appendix 1 for further detail).

The government’s current policy for Green Belt is expressed in Section 9 of the NPPF, the fundamental aim being ‘to prevent urban sprawl by keeping land permanently open’. The strength of Green Belt policy is the robust principle that certain forms of built development, however small in scale, are inappropriate and should not be approved except in ‘very special circumstances’.

Government guidance in the NPPF explains that the Green Belt serves five purposes:

- 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 land.

Green Belt is a spatial planning tool, not a designation that provides landscape protection. Current Green Belt policy does not require Green Belt to be of high landscape quality or even particularly attractive. Different legislation exists to protect landscapes of value and natural beauty such as National Parks, Areas of Outstanding Natural Beauty (AONBs), and local designations such as Special Landscape Areas (SLAs) or equivalent.

Within the Green Belt, the normal [planning] presumption in favour of sustainable development is reversed. The onus is on the developer to demonstrate why planning permission should be granted. It is this provision which makes Green Belt a highly restrictive policy.

In the past, the government’s Planning Policy Guidance for the use of land in Green Belts (PPG2) was well defined:

- to provide opportunities for access to open countryside for the urban population;
- to provide opportunities for outdoor sport and recreation near urban areas;
- to retain attractive landscapes, and enhance landscapes, near to where people live;
- to improve damaged and derelict land around towns;
- to secure nature conservation interest; and
- to retain land in agricultural, forestry and related uses.

(PPG2: Green Belts – 1995, amended March 2001)

In NPPF, Green Belt objectives are no longer so clearly defined. Instead of being required to ‘provide opportunities’, local authorities are now required to ‘look for opportunities’.
“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”
(NPPF paragraph 81, 2012)

In practice, land in the Green Belt functions in much the same way as open countryside around other towns and cities. In most locations, depending on land management, it may provide one or more key functions:

- farming for food and forestry (in some places, Community Forest trusts manage and maintain areas of Green Belt land);
- access to the countryside around towns (via the public rights of way network);
- opportunities for sport, recreation and outdoor activities for health and wellbeing;
- maintaining the openness (undeveloped nature) of land and preventing the merging of towns and villages;
- offering some degree of visual amenity (high quality in some locations, unattractive in others);
- providing opportunities to safeguard biodiversity and the biological health of soils;
- providing space for flood water;
- providing opportunities to improve air quality; and
- being generally valued by residents of the urban areas it surrounds, the town and village communities within it, and the wider rural communities that lie outside it, even if there is no public access onto the land.

Where is Green Belt land and what does it include?

Green Belt occurs in specifically designated areas around many, but not all, cities and towns in the UK. Most Green Belt land is in private ownership and is generally used for agriculture, recreation or forestry. There are 14 Green Belts designated in England, one in Wales, 13 in Scotland and 30 in Northern Ireland (see Appendix 2 for further detail).

Statistics are not available for all Green Belt land in the UK. However, in England, the extent of designated Green Belt at 31 March 2016 was estimated at 1,635,480 hectares. The total area has been decreasing in recent years with a net loss of approximately 2.5% in the decade between 2005 and 2015 and a further decrease of 1,020 hectares (less than 0.1%) between 31 March 2015 and 31 March 2016.

Many local authorities are in the process of carrying out Green Belt reviews as part of their Local Plan or local plan review preparation. These are likely to be concluded within the next few years, allowing the local authorities to set in place policies to release Green Belt land over the next 25-30 years, where ‘exceptional circumstances’ can be demonstrated. This suggests further reductions in the total area of Green Belt land are to be anticipated.

However, in the past five years, Scotland has introduced three new Green Belts around Perth, Dunfermline and St Andrews, demonstrating there is still a role for new Green Belts in current town planning policy.
What the Green Belt is not

A common public misconception is that all countryside is Green Belt. This is not the case. Most of the open fields around the edges of towns and villages are not designated as Green Belt.

Green Belt land is not always open and it is not always green. Most Green Belt comprises working landscapes that are neither pristine nor undisturbed ‘countryside’, for example plant nurseries, sports fields and storage yards. There is no legal definition of the term ‘openness’ with regard to the Green Belt and this characteristic continues to be debated at planning inquiries and via High Court challenges.

Green Belt is not always a continuous belt all around the edge of a town. It can vary in width from less than a hundred metres to many miles wide. Green Belt may take the form of isolated pockets of undeveloped land that are physically disconnected from other areas of Green Belt.

Where similar approaches such as Green Gaps, Green Wedges, or Green Fingers have been used, separate planning policies will apply.

Farming within the Green Belt continues to be a major land use, although farmland on the edge of towns tends to be used for grazing, including for horses, or left in a neglected or semi-derelict condition.

There are no increased rights of access for the public to enter privately owned land within the Green Belt. Green Belt land is not generally accessible by the public other than via the public rights of way network.

What Green Belt does not do

Green Belt policy does not require the designated areas to be of high landscape quality or even particularly attractive. Some areas designated as Green Belt are of distinctly poor environmental and visual quality.

Other than in Scotland, Green Belt policy does not require Green Belt land to provide any protection for wildlife. It no longer requires landscape, nature conservation, derelict land, recreation and access improvements as previously in PPG2 (see above).

Green Belt policy does not prohibit all forms of built development, the NPPF allows certain types to be permitted in Green Belt. These include buildings for agriculture and forestry, recreation and sports uses, redevelopment of previously developed sites, mineral extraction, engineering works, and transport infrastructure.

Green Belt policy fails to acknowledge pressing current issues such as flood risk, water quality, air pollution, social cohesion and health and wellbeing. The loss of both Structure Plans and Regional Spatial Planning in many areas which enabled cross-boundary planning policies has led to Green Belt reviews often failing to consider the wider needs of society, such as for climate change mitigation, biodiversity enhancement and the sustainable expansion of existing settlements.
JUSTIFICATION FOR STRATEGIC REVIEW OF GREEN BELT POLICY

Green Belt is highly valued by residents of the urban areas it surrounds, the rural communities within it and the wider rural communities that lie outside it. However, for privately owned Green Belt land, there are no delivery mechanisms or incentives for local authorities (or landowners) to ‘plan positively to enhance the beneficial use of the Green Belt’, as NPPF at paragraph 81 directs.

Green Belt land offers the potential to deliver all the benefits previously stated in PPG2, plus others such as:

- positive management and uses of land to benefit rural communities and farm economies and to support a strong relationship between people living in urban areas and the surrounding countryside;
- public access for health and wellbeing, social cohesion, sport and recreation;
- productive landscapes for local food production including allotment gardens and community orchards;
- opportunities to safeguard and enhance good quality wildlife habitats, create multi-purpose green infrastructure networks that safeguard clean water, clean air, fertile soils and biodiversity;
- opportunities to build resilience to climate change, including reduction in flood risk, sequestration of carbon, renewable energy including biomass, and multiple ecosystem services; and
- enhanced landscape character, scenic beauty and visual amenity within the settings of urban areas.

At present, many of these opportunities are being underutilized. A more efficient, more relevant, more productive Green Belt is urgently needed.

Embedding landscape principles into planning practice will rely on better understanding via professional training, cross-disciplinary expertise in joint working, agreement of best practice procedures including methodologies for assessment on the ground, collaborative development of policies and shared processes for delivery mechanisms and future management regimes.

Together the built and natural environment professions have all the technical skills needed to properly inform local planning policies and development decisions. However, these intertwined issues will not be resolved by a single strategic study or an experimental capital project in a single location. The identification of future potential for the development of Green Belt land will require the consistent assessment of spatial options against agreed social and environmental sustainability criteria, as identified above.

Aspects of green belt land under threat of development in Worsley Road, Salford City Council. © Nick Harrison
CONCLUSIONS

The Landscape Institute and its members acknowledge that Green Belt policy has been highly effective in meeting its original aims. However, as with any national policy, there is always room for improvement as circumstances change; we believe that now is the time for such a review.

We see many opportunities for debate on Green Belt issues addressing the following:

- a Natural Capital Accounting approach to the Green Belt;
- Green Belt Management Plans to balance the competing needs of landowners with those of people who live in or near, use, or visit the Green Belt;
- new public investment into Green Belt Stewardship Schemes as proposed by the Government’s 25 Year Environment Plan;
- joint committees to support Green Belt management initiatives;
- funding to support Green Belt initiatives; potential for Green Belt Development Levy as part of the ‘Net Gain’ policy outlined in the 25 Year Environment Plan;
- protection of Green Belt land in ways similar to the approach taken to the protection of National Parks and AONBs, as Green Belt provides accessible landscape close to urban areas;
- consideration of the ‘exceptional circumstances’ that are required to justify the designation of new Green Belt through collaborative planning policies (through combined authorities or joint planning bodies) and consideration of alternative planning policies that have successfully been applied in order to avoid the coalescence of settlements such as Green Wedges, Green Gaps, and Metropolitan Open Land designations.

The Landscape Institute proposes to initiate the following actions:

- raise public awareness of Green Belt definitions and overcome misunderstandings;
- call for a nationally accepted methodology for Green Belt boundary reviews;
- contribute to and, whenever possible, lead a debate about the future of Green Belt throughout 2018 and beyond, looking at alternative policy approaches, options for delivery and funding mechanisms for management and future governance of Green Belt land;
- encourage support for, and whenever possible, identify mechanisms to ensure more effective cross-professional, cross-sector and cross-agency working in Green Belt locations;
- promote the widespread adoption of a strategic approach to Green Belt planning in order to secure the original objective of preventing urban sprawl through keeping land permanently open, so that society can once more rely on the spatial designation; and
- in collaboration with partners, call on the UK government to undertake a strategic review of Green Belt policies and guidance as part of the proposed revisions to the National Planning Policy Framework and National Planning Practice Guidance (2018).

- call on the Welsh Government to undertake a strategic review of Green Belt policies and guidance as part of the proposed revisions to Planning Policy for Wales; and

- call on the Scottish Parliament to undertake a strategic review of Green Belt policies and guidance as part of the passage of the Planning Bill and as part of the review of Scottish Planning Policy and National Planning Framework 4.
APPENDIX 1: ORIGINS OF GREEN BELT:

Green Belt is a national planning policy in the UK, initially adopted to control the rapid growth of post-war housing estates around existing towns. The London Metropolitan Green Belt was first proposed in 1933 as a ‘green girdle’ and subsequently defined by the Greater London Plan of 1944, to curtail the unchecked growth of London’s urban area. The 1947 Town and Country Planning Act gave powers to local authorities to designate Green Belt, and it has become a successful policy that has changed very little. Circular 42/55, released by the government in 1955, encouraged local authorities to establish their own Green Belts. Some did so, many did not.

Many local authorities decided historically not to designate Green Belt. Sometimes Green Gap or Green Wedge policies were adopted instead, or the local plan may have relied on restrictive policies such as Strategic Gaps. Other local authorities adopted policies to protect areas of countryside, defined in their local plans, and applied restrictions on built development in those areas. This appears to have given rise to inconsistencies across the UK where some areas without Green Belt are seen to be of lesser value in the eyes of the public and politicians.

In England, paragraph 82 of the National Planning Policy Framework (NPPF) 2012 to be revised considers the ‘general extent of Green Belts across the country is already established’ and ‘new Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.’

This policy currently leaves little room for the general expansion of Green Belts throughout England, even where there are towns and cities which could potentially benefit from the designation. However, in the past five years, Scotland has introduced three new Green Belts around Perth, Dunfermline and St Andrews, demonstrating there is still a role for new Green Belts in current town planning policy.
APPENDIX 2:
GREEN BELT LOCATIONS AND POLICIES IN THE UK:

There are 14 Green Belts designated in England, one in Wales, 13 in Scotland and 30 in Northern Ireland.

England

Green Belt has been designated around a relatively small number of towns and cities in England, most of which are larger cities and metropolitan areas. Also included are some smaller towns and cities with historic centres such as Bath, Oxford and Cheltenham. The majority of towns and a number of larger cities such as Leicester, Peterborough, Exeter and Norwich have no Green Belt, despite some of these cities also having historic cores.

Development around villages, towns and cities has historically been controlled by way of settlement boundaries and restrictive policies in local plans that preclude development in open countryside. However, this changed with the publication of the NPPF in 2012 and the introduction of the ‘presumption in favour of sustainable development’ which does not accord with such restrictive policies.

Whilst many of these policies remain extant, they carry much less weight in the overall planning balance than before and do not prevent a piecemeal approach to settlement expansion.

Following the abolition of strategic planning authorities and regional planning bodies, via the Localism Act of 2011, the government passed the responsibility for managing Green Belt land down to local authorities and neighbourhood plan groups. NPPF para 83 acknowledges the permanence of Green Belt boundaries and the need for such boundaries to endure beyond the plan period. It states that ‘Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans’ (and that) ‘once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.’

Scotland

In Scotland, local planning authorities are governed by Scottish Planning Policies (SPP) and a [Scottish] National Planning Framework (NPF3).

The first Green Belt in Scotland was established around Edinburgh in 1957. The principle of designating a Green Belt in Scotland is set out in the Strategic Development Plan in the four city regions of Aberdeen, Dundee, Edinburgh and Glasgow under reforms introduced by the Planning etc. (Scotland) Act 2006, along with strategic polices governing its operation and a broad outline of its boundaries. The exact boundaries are defined in local development plans.

Out with the city regions, the local development plan establishes the need for a Green Belt, identifies specific boundaries and sets out the policy for future development within it including the identification of appropriate uses.

The purpose of a Green Belt, as outlined in the SPP (2014) is to:

- direct planned growth to the most appropriate locations and support regeneration;
- protect and enhance the quality, character, landscape setting and identity of towns and cities; and
- protect and give access to open space within and around towns and cities.

SPP also advocates the effective management of Green Belts as an important resource, providing a range of opportunities for outdoor recreation, outdoor education and tourism, protecting and enhancing biodiversity, the landscape and the historic environment.

The Scottish government do not have official statistics relating to Green Belt land in Scotland and thus it is not possible to report on exact percentage land cover in Scotland, or change over time since the original Edinburgh Green Belt designation in 1957. However, there are currently 13 Green Belts around the main towns and cities.

In recent years the Edinburgh Green Belt has seen considerable development pressure both through the formal development plan process and informally from housebuilders looking to respond to the housing supply shortfall. Significant Green Belt releases in West and South East Edinburgh, as well as Queensferry, Currie and Balerno form part of the Edinburgh Local Development Plan, adopted in November 2016.
Wales

Planning Policy Wales (Edition 5) 2012 (PPW) sets the context for managing urban form in Wales by means of Green Belts and Green Wedges. Green Wedges are similar to Green Belts in planning control terms, development only being permitted if it maintains the openness and character of the green wedge and does not contribute to the coalescence of settlements or adversely affect the setting of the urban area. The essential difference between these two designations is the issue of permanence. Land within a Green Belt should be protected for a longer period than the current development plan period, whereas Green Wedge policies should be reviewed as part of the development plan review process.3

Wales has one Green Belt between Newport and Cardiff which is identified in Newport City Council’s Local Development Plan (2015) on land immediately east of Cardiff’s boundary. The purpose of this designation is to prevent the coalescence of Cardiff and Newport and protect the openness of land between Cardiff’s boundary to the east and Newport.

Interestingly, the Cardiff Local Development Plan (2016) designated land to the north of Cardiff as Green Wedge rather than Green Belt after due consideration as part of the local development plan process.

Similarly, land around Swansea is protected by a series of Green Wedge designations under Policy EV23 in the Swansea Development Plan. In both cases it seems clear that the authorities do not wish to be tied to a longer term restrictive policy but do recognise the medium-term benefit of the Green Wedge over the current development plan period.

Northern Ireland

Green Belt Policy in Northern Ireland is currently set out in Regional Planning Policy GB/CPA 1 Designation of Green Belts and Countryside Policy Areas (CPAs). Whilst this document is technically still a live planning instrument, Planning Policy Statement 21 – ‘Sustainable Development in the Countryside’ and the supporting Supplementary Planning Guidance (SPG) ‘Building on Tradition’ 2010 take precedence.

Furthermore, the new Strategic Planning Policy Statement (SPPS 2015), which will supersede PPS21, makes no reference at all to Green Belt, stating the following in paragraph 6.71, in relation to preparation of Local Development Plans: ‘Development in the countryside must not mar the distinction between a settlement and the surrounding countryside, or result in urban sprawl.’

As in Wales, Northern Ireland has a more clearly defined two-tier system – although the CPAs are a broader designation, designed not only to restrict development in the countryside but also to protect visual amenity in areas of landscape quality and protect rural character.

Policy GB/CPA 21 defines the development that is appropriate to a Green Belt or CPA, but also makes it clear that to be acceptable, even those types of development must respect the open character and environmental qualities of these rural policy areas in terms of their visual amenity and local impact. Protection of these qualities is paramount and in certain special landscapes of national importance, within Green Belts or CPAs, no development at all will be permitted unless it is in the wider public good.

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APPENDIX 3: CURRENT STATUS AND STRENGTH OF THE GREEN BELT

The fundamental principle of Green Belt, to keep land free from buildings, is robustly defended by Planning Law, national planning guidance, precedents and case law. At the core of this designation is the ‘in perpetuity’ requirement, that Green Belt boundaries will be maintained permanently, certainly for much longer than the usual 10 or 15 year local plan period.

In the past, county, regional and sub-regional planning authorities adopted robust policies to safeguard Green Belt; local authorities relied on these strategic cross-boundary policies. Since Structure Plans and Regional Spatial Strategies have been abolished in some areas, these strategic safeguards have been dismantled and, because of the loss of these overarching policies, many local authorities now see the need to review the Green Belt as part of their Local Plan process.

Green Belt reviews currently underway in many areas will almost certainly bring about significant changes in the extent of existing Green Belt, without any changes to national policy. We anticipate this process will result in the release of extensive areas of land from the Green Belt designation in future years. The Landscape Institute is particularly concerned that, in the review process, these individual local authorities have no model methodology or protocols to follow, so the outcomes in terms of qualitative analysis tend to be inconsistent from one area to the next.

The Landscape Institute is aware that current government policy, underpinned by the principle of localism, delegates decision-making to local planning authorities that, individually, are unable to take a strategic overview of Green Belt land within their own and neighbouring districts. Despite the legal ‘duty to cooperate’, we consider that Local Plan teams, Neighbourhood Plan groups and local politicians are too constrained by administrative boundaries to take the decisions needed to protect and enhance this valuable resource, and to ensure that it functions effectively, in the public interest.