Written evidence submitted by Professor Vincent Goodstadt [FPS 058]

Response to the Committee’s Question on Green Belt Policy

Summary

A. There is a need for untangling the confused and misused approaches to the designation and protection of the Green Belt. The review of the policy for Green Belts is now an imperative. In the national housing debate is now the over-riding political football which consistently reverts to a debate about releasing land from the Green Belt.

B. This note therefore explores the problems with the Green Belt policy, the myths around its impacts and the potential ways forward for the Institute. It is a personal viewpoint and based on experience across the country, and in particular:
   a. where Green Belts have been successful and the factors that have been enabled this;
   b. the factors that have undermined the delivery of its objectives; and
   c. the myths around the Green Belt that polarise debate and frustrate effective dialogue between vested and competing interests.

C. The analysis in this note is based upon three core propositions:
   - In essence the Green Belt is a strategic planning tool to manage the growth of major towns and cities. It is therefore only as good and effective as the core development strategy within which it sits; most of the criticism that it has received arise from where there is a lack of effective strategic planning;
   - As a corollary its specific functions (e.g. preventing urban coalescence, protecting the setting, supporting brownfield development) are applied as merely local planning goals. Green Belt policy has therefore been increasingly hijacked and turned into a local planning policy to protect local amenity; and
   - Green Belt areas not only need strict control but also pro-active management if they are to deliver their stated roles, since landscapes, ecosystems, recreational uses etc. need to be managed and enhanced if they are to be sustained and effective. This is increasingly difficult with the constrained resources and loss of expertise.

Context

1. The following submission to the Committee addresses the specific question on Green Belt policy. It is based upon my extensive experience as a chief planning officer in designating and planning land releases from the Green Belt, and in advising local councils across the UK on urban regeneration or urban growth issues, including Glasgow, Cambridge, Oxford, Sheffield, Belfast, West Yorkshire, the West Midlands and Bristol city region. I also draw upon my experience, amongst other things, as a past President of the RTPI, and internationally as an Honorary President of the European Council of Spatial Planners.

2. The key to any debate about the Green Belt is the need to recognise that Green Belts are not a ‘local’ plan policy: they are a key tool within a wider programme of coordinated action on planning housing and transport investment over fairly large areas around cities and conurbations. However, because of the lack of strategic planning in England, urban expansion is in the main managed through confrontational negotiations. This fails to deliver longer term more sustainable settlement strategies, for example, new towns or corridors of growth. A new strategy for managed urban growth is required which will include a fundamental reappraisal of Green Belt Policy. Green Belts it was not really placed within the context of managed urban growth. We need to develop sustainability tests as the means to determine changes to Green Belts.

3. Historically Green Belts serve a wide range of strategic spatial purposes depending
on local circumstances e.g. managing overspill policy, prevention of coalescence, support urban regeneration or protect the urban setting. This is reflected in the variety of forms of Green Belt s that exist e.g. a cordon sanitaire, or a housing market area or a protective corridor. The debate about Green Belts needs to reflect this diversity and not slip into formulaic dialectics.

4. The reality is that management of urban growth is becoming more important. Without a Green Belt designation however, there is a real challenge in ensuring consistency of policy across local planning authority areas which are interdependent in terms of their housing and labour markets and journey to work catchments. This has not been such an issue historically where there have been formal and effective strategic planning mechanisms (e.g. structure plans) or where national government has been prepared to use its call-in powers. The default position however in many situations is to rely on the appeal process.

5. It is also accepted that in addition to reinforcing whatever is the prevailing regional development strategy, there are a series of more specific objectives that the Green Belt serves or has served in protecting local amenity and managing the wider countryside (see Box). These policy objectives however could all be met through specific policies without a Green Belt. If there were no Green Belts development in the countryside would still be strictly controlled, as it is around those towns and cities which have no Green Belt (e.g. Leicester) or where Green Belt designation has been removed (e.g. Tayside).

**Effective Green Belts**

6. There are three inherent paradoxes to Green Belt policy which, if they are not addressed, constrain its effectiveness
   a. It is an overly simple policy being applied to a complex web of problems;
   b. It is expressed as a 'Permanent' policy solution being applied in dynamic and uncertain situations; and
   c. It represents a negative covenant when equal priority lies with positive action for which there are divided responsibilities

7. The Green Belt therefore is a multi-layered policy seeking to support a wide range of objectives (see box above) which are not necessarily mutually reinforcing and are often in conflict e.g. local amenity and the need for more housing land.

8. Similarly, there is an illusion of permanency which is often associated with a search to establish boundaries based on fixed "Natural" features, or features such as road lines or field boundaries which have no intrinsic reason to be the 'limit' of development. In addition, it needs to be recognised that whatever planning horizon is seen as appropriate with the passage of time the basis upon which the Green Belt was defined will have become dated. Review is inevitable if the Green Belt is to be kept up to date. In contrast, the experiences of trying to guestimate land requirements beyond current planning horizons have proved flawed, both in the anticipation of the numbers and locations that are required.

10 There has been a similar mismatch between the aspirations for the management of the Green Belt and the resources required to deliver the scale of action required to
The Groundwork Trust, urban forestry and other projects the Dartington Trust inspired Countryside-around-Towns studies and the urban fringe projects have had much success. However, the potential for linking policies and programmes has been limited, with a few notable exceptions. As a result, the scale of action required to upgrade or manage the environment the Green Belt has always been underestimated. For example, an FICGB report on a lowland strategy for England & Wales estimated that the scale investment in urban fringe and community woodlands was only 25% of what was required to deliver the quality of landscape sought in policy for these Green Belt areas. More recently resources are known to have been reduced further but this has not been quantified.

9. Despite these endemic challenges there have been examples over the years of effective Green Belts despite changing strategic directions for example:
   - the 1950s & 60s it supported the new town development programme; or
   - the 1970s & 80s which allowed the necessary retrenchment on urban renewal with the ‘collapse’ of the expansion programmes and dramatically changed demographic context; or
   - 1990s & 2000s where they were reviewed for example to reinforce growth strategies (e.g. Cambridge) or as part of renewed regional planning processes (e.g. the West Midlands RSS or the city regions in Scotland)

10. One example over this whole period has been in Glasgow and the Clyde Valley metropolitan region under differing planning regimes. Firstly, this was in the context of the Abercrombie Plan and three new towns, replaced by an urban regeneration strategy which saw brownfield housing output sustained at c.70% whilst private house building rates rose by more than doubled and the rate of urban expansion fall by 80%. This has been followed by a period of managed urban expansion. Significant Green Belt land releases have made about every ten years, as required to maintain an effective land supply. This has been consistently supported by a Green Belt management strategy for a functional economic region in various incarnations since the 1970s, currently the GCV Green Network.

11. Amongst the common conditions for successful Green Belts are where Green Belts are:
   - Related to a functional urban region in terms of labour and housing markets and (therefore journey to work areas);
   - Complementary and integral to a wider up to date settlement strategy, in terms extent and time horizons;
   - A clear strategic purpose (e.g. urban expansion or retrenchment);
   - Complementary objectives (e.g. urban character & setting) analysed and mapped;
   - Reviewed as part of a roll forward of the wider Settlement Strategy;
   - Supported through programmes of environmental action, and development is not seen as a ‘solution’ for degraded Green Belt land.

**Threats to Green Belt Policy**

12. Despite the status given across the UK & Ireland to the Green Belt in national policy the principle of Green Belts is undermined by the culture that surrounds it and the lack of rigour in the debate. This has been characterised in the NIMBY culture that prevails not just in the behaviour of individuals and local communities but also by planning authorities that creates what can be described as ‘institutionalised NIMBYism’. However, it also needs to be recognised the equally pervasive position that is often adopted by those with a development interest. This is characterised by asserting a belief and commitment to the Green Belt but arguing that it should not or does not apply to their land holdings. This has been termed a ‘CONU culture – Control Others Not Us’. Both cultures, NIMBY & CONU, are based on treating the Green Belt as a local control mechanism, ignoring its primary strategic function.
13. These attitudes are fuelled by the gaps that exist between the rhetoric and reality in terms of the sectoral interests engage which results in a dumbing down of public debate into a set of fixed positions and shibboleths. This has resulted in a series of myths about the Green Belt which divert and confuse discussion including those related to the following:

- Sustainable patterns of development
- Who benefits from its designation?
- The impact on houses prices
- The environmental value of the Green Belt
- The extent of the Green Belt;

14. **Sustainability of Locations:** Where Green Belts boundaries are fixed, development pressures to accommodate the growth of towns and cities has to be met by leapfrogging the Green Belt. This has given rise to concerns that this results in longer and therefore less sustainable commuting patterns. This is true where it diverts development from urban renewal (i.e. brownfield locations) but not so when talking about peripheral urban locations which are not well served in terms of transport and services. As a corollary it can also result in what is often described as ‘urban cramming’.

15. **Impact on House Prices:** There is a common assertion that Green Belts increase house prices. However, it needs to be recognised that house prices have risen across the country even where there is no Green Belt. There is a vested interest in inflation in house prices (i.e. essentially land values) – the existing land owners, book value of options, banks etc. House prices are determined by wider issues related to the general state of the housing market, ease of borrowing and balance of supply of supply and demand. Land supply is therefore only part of the problem and not necessarily the main one. Green Belt policies therefore are often a symptom rather than a cause of the housing problem – i.e. the lack of willingness to make sufficient land available.

16. **The Environmental Quality of the Green Belt:** It is argued that poorer quality land could and should be released from the Green Belt. It is asserted that there is a lot of unused or degraded land within the Green Belt which can be released for development without undermining it. Besides often being exaggerated and geared to vested interest, it not only diverts the debate but also does not stand up to critical examination. Degraded landscapes are often associated with such activities as mineral working and the provision of utilities that are an essential Green Belt use. On the other hand, the isolated and sporadic pattern of underused and unused land in the Green Belt however is inappropriate basis for planning future settlements.

17. More insidiously however, the very hope of development creates a climate of disinvestment in peri-urban land management. It needs to be recognised fact that the degraded landscapes that exist are often associated with hope values reinforced by speculation in land ownership, disinvestment in land management (e.g. arterial drainage systems and woodland management). To move the Green Belt boundary outwards would merely result in a new line for speculation. The reality is that a strong Green Belt provides the confidence needed to invest in land management and not allow speculation and creation of hope values, where disinvestment creates an expectation and sense of the inevitability future development. This was even highlighted in to the NPPF:

"Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul."
18. **Who benefits?** It is accepted that the immediate residents are the beneficiaries of Green Belt policy. However, there is a wider community of interest that benefits from ensuring that the planned areas of development are well served by transport and services. Green Belts focus development pressures on preferred areas of urban renewal and managed urban expansion and divert development pressures away from less appropriate development locations. Therefore, for example the protection of the Green Belt in Kent and Essex has been of direct benefit to those living in and promoting the Thames Gateway and east end of London.

19. **The Extent of the Green Belt:** There is a false concept that there is a fixed amount of Green Belt that is being sought – release some and designate an equivalent amount to compensate. This is like saying that if we demolish a listed building but add another building to the list elsewhere then our overall heritage has been sustained. The key point is that there is nothing intrinsically wrong with releasing Green Belt where it is required to provide development opportunities of the right scale in the right places (i.e. those places which meet the range of criteria for the most sustainable living). To release Green Belt in places which are less desirable and, in scale, greater than required merely diverts and displaces development away from better locations. Therefore, it carries high opportunity costs for society.

**Policy Implications**

20. The problems with Green Belt policy discussed in this note are essentially a strong case for better strategic planning arrangements, associated with joined up government, linked programmes to deliver infrastructure, the timely delivery of social and community services and better quality designed new communities.

21. However necessary these measures are not sufficient on their own. The way we plan for Green Belts needs to be changed

- The Green Belt is the one remaining and enduring strategic policy that has been bequeathed from former regional plans / guidance and county structure plans. It is not a local designation. There is need for a mechanism to allow a strategic re-assessment of Green Belts and not be left to incremental review by the separate constituent councils;

- Green Belt policy should be subject to the same tests of soundness as any other local plan policy in a plan-led system. At present the Green Belt is treated as a separate policy from the development plan. It is taken as a ‘given’ in plan making. The designated boundaries are however often very dated, which for any other policy would reduce the weight that should be given to the policy in decision-making.

- New approaches need to be brought forward to clarify policy for developments in the countryside related to brownfield land and isolated and sporadic developments to discourage ad hoc speculation in land that is most acute in peri-urban Green Belt land and capture the related uplift in value created by the betterment associated with a planning consent.

22. There is also a need to tackle the need for better management of the countryside; this is linked to the need to require a systematic assessment and review of how the stated objectives of the Green Belt should be interpreted and safeguarded. Such an assessment would help guide future reviews and release of Green Belt land by not treating all Green Belt land as equally valued. Some of the most effective Green Belt management policies and programmes have been where they have been linked of the work of economic development bodies and government bodies (e.g. in forestry and agriculture).
23. The issues associated with the Green Belt policy listed above need to address the following questions:

☐ Do we need to reassessment the purposes of the green belt, to refocus on its strategic functions?
☐ How should / can a joint strategic review of each Green Belt be undertaken?
☐ To what extent the status to be attached to the Green Belt (in terms of being up-to-date) be conditional to the extent to which it has been reviewed as part of the local plan?
☐ What status should be attached to a Green Belt status If it has not been reviewed, say, over last 10 years;
☐ Which Green Belt related policies need to be given greater clarity e.g. in terms of the presumption in favour of brownfield land does not extend to Green Belt areas, or the clarification of policy on isolated and sporadic development and the interpretation of specific locational needs?
☐ What constitutes a sound review of Green Belt boundaries including how to build in flexibility and phase the release of land? and do we need national guidelines on this?
☐ Who is best placed to draw up related practice notes on how to undertake the technical assessment of Green Belt objectives?
☐ Should there be a review the use of call in powers and powers of direction where councils do not fulfil their obligations to keep the Green Belt under review?
☐ Should national policy and related advice be strengthened to explicitly require clear policies and programmes of action for Green Belt management to be prepared? If not, how can such action be better promoted?
☐ What inter-departmental action would deliver the required cooperation, to ensure greater synergy and complementarity between government departmental policies and programmes?
☐ What further research is need to inform the debate?

24. Therefore, over and above the need for more effective strategic planning which applies to many of the 'problems' with the planning system, the issues associated with the Green Belt policy would be help by taking the following action:

☐ An independent or joint strategic review of each Green Belt, recognising that it is not just a local plan issue;
☐ Linking the status that needs to be attached to the Green Belt to the extent to which it is up-to-date and has been reviewed as part of the local plan;
☐ Remove status of the Green Belt in terms of the provisions of S38 if it has not been reviewed over last 10 years
☐ Clarify Green Belt specific policies e.g. in terms of the presumption in favour of brownfield land does not extend to Green Belt areas, or the clarification of policy on isolated and sporadic development and the interpretation of specific locational needs;
☐ Set out guidance on what constitutes a sound review of Green Belt boundaries including how to build in flexibility and phase the release of land
☐ Draw up related practice notes on how to undertake the technical assessment of Green Belt objectives
☐ Review the call-in powers and powers of direction where councils do not fulfil
☐ Require clear policies and programmes of action for Green Belt management as part of every local plan
☐ Draw up inter-departmental action plans for ensuring synergy and complementarity between governmental policies and programmes

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