



**BRENTWOOD  
BOROUGH COUNCIL**

# **Green Belt Study Part I: London Metropolitan Green Belt Overview**

## **Reg 19 Pre-Submission**

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# 1 INTRODUCTION

## 1.1 THE BRIEF

1.1.1 Brentwood Borough Council (**'the Council'**) has commissioned Crestwood Environmental Ltd. in September 2017 to provide a summary document to describe the context of the London Metropolitan Green Belt, outlining its history and potential future, specifically in relation to Brentwood Borough. The document is not intended to be an assessment of policy position, but rather to provide contextual information for reference in relation to the emerging Brentwood Local Plan. This summary document forms Part 1 of a suite of Green Belt Assessment documents.

## 1.2 CRESTWOOD ENVIRONMENTAL

1.2.1 Crestwood Environmental Ltd. is an independent environmental consultancy and a Registered Practice of the Landscape Institute, employing experienced landscape architects, and planning and environmental professionals with extensive experience in land-use planning and impact assessments.

## 1.3 SCOPE

1.3.1 Local Planning Authorities have a duty to produce development plans guiding the strategic development and landuse planning within a borough, district, county or unitary authority area. Brentwood Borough Council is the Local Planning Authority responsible for guiding development in Brentwood borough. The Council is in the process of developing a new Local Plan. The Borough is wholly located within the London Metropolitan Green Belt.

1.3.2 National policy requires that each local authority should plan to meet its Objectively Assessed Housing Need, but also requires that Local authorities comply with land use policies relating to Green Belt.

1.3.3 Given that 89% of Brentwood Borough is designated as Green Belt, it is important that the development of the emerging Local Plan is placed in the context of the Green Belt protections afforded.

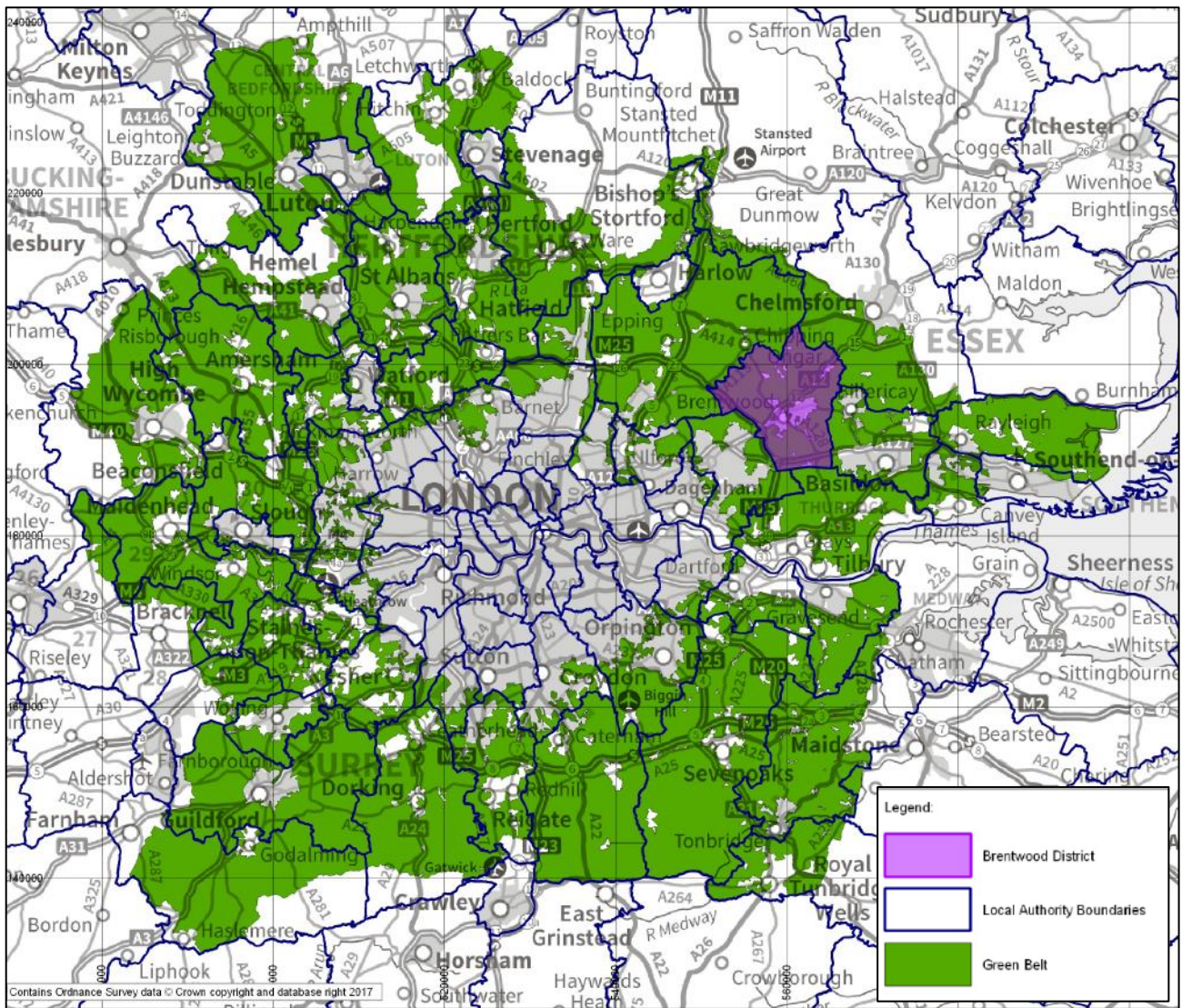
1.3.4 This document sets out:

- The current context of Green Belt land in England and the London Metropolitan Green Belt;
- A brief history of the Green Belt and London Metropolitan Green Belt;
- An overview of past and current national Green Belt policy;
- An overview of current Government housing policy and relationship to Green Belt policy; and
- A brief overview of future Green Belt policy considerations.

## 2 LONDON'S GREEN BELT AND BRENTWOOD: CONTEXT

2.1.1 Green Belt land covers almost 13% of England's landscape, with the London Metropolitan Green Belt comprising 3.7% of land in England or 484,173 hectares of land<sup>1</sup>. The London Metropolitan Green Belt is the largest of 14 Green Belt areas within England and covers most of Hertfordshire and Surrey and extends beyond Southend. It overlaps many local authority areas, including Brentwood Borough (see Plate 1).

**Plate 1** The context of the London Green Belt area



2.1.2 All Local Planning Authorities must account for Green Belt policy and requirements in the development of their Development Plans.

2.1.3 As shown at Plate 1, Brentwood Borough is entirely located within the London Metropolitan Green Belt, northeast of Greater London. Brentwood is c. 15,312ha in area, of which c. 13,700 ha of land is currently designated as Green Belt (over 89% of the borough). Brentwood currently makes up approximately 2.83% of the overall London Metropolitan Green Belt.

<sup>1</sup> Green Belts: A Greener future. A joint report by CPRE and Natural England, 2010.

- 2.1.4 For the most part, Brentwood Borough has been located within the Metropolitan Green Belt since the outer boundary was first defined in the County of Essex Development Plan, approved in 1957. The Green Belt was extended to cover the northern part of the Borough in the subsequent Review, approved in 1976.
- 2.1.5 The inner Green Belt boundary around the town of Brentwood was first defined on the Town Map of the 1957 County Development Plan. The 1976 Approved Review of the County Development Plan (ARDP) significantly amended that boundary and also defined boundaries around the other main settlements.
- 2.1.6 The previously adopted 1995 Brentwood Local Plan defined first time boundaries around the smaller built up areas of Blackmore, Hook End, Stondon Massey and Mountnessing. At the same time, the ARDP boundary was reviewed in detail to ensure consistency and logic, and minor amendments were made to reflect planning consents and to comply with specific criteria.
- 2.1.7 No changes to the Green Belt boundary were proposed or adopted in the extant Brentwood Replacement Local Plan (adopted August 2005).
- 2.1.8 Whilst 89% of Brentwood Borough is Green Belt, it is also noteworthy that:
- *10% of the borough is built on (developed) – compared to a UK average of 6%;*
  - *8% of the borough is Green urban (this includes formal parks, sports pitches, golf courses, etc.) – compared to a national average of 3%;*
  - *76% of the borough is farmland – compared to a UK average of 57%; and*
  - *6% of the borough is ‘natural’ (e.g. woodland/nature conservation) – compared to a UK average of 35%.*

(Source: <http://www.bbc.co.uk/news/uk-41901294?platform=hootsuite> accessed 08/11/17)

- 2.1.9 This provides the context in which Brentwood is developing the new Brentwood Local Plan 2013 – 2033. With around 10% of the existing borough already previously developed and 89% of the borough comprising Green Belt, there is a finite amount of land available in which to deliver the required housing and employment growth over the new local plan period. This is a fundamental consideration for the ensuring the new local plan is sustainable over the plan period.

## **3 LONDON’S GREEN BELT: A BRIEF HISTORY**

### **3.1 ORIGINS**

- 3.1.1 The term ‘Green Belt’ has its roots in continental Europe, where ‘buffer zones’ were created to separate new development from historic towns during the 19<sup>th</sup> Century, such as in Vienna.
- 3.1.2 Proposals for a London Green Belt were pursued from 1890; however support for the notion only grew with the advent of strategic planning. The London Society published the “Development Plan of Greater London” in 1919. The London Society and Campaign for the Protection of Rural England (CPRE) lobbied to designate a circa 2 mile wide belt of land around London, largely free from development.

3.1.3 London's Green Belt took many years to implement and was first formally proposed by the Greater London Regional Planning Committee in 1935 *"to provide a reserve supply of public open spaces and of recreational areas and to establish a green belt or girdle of open space"*. Various proposals also emerged throughout the late 1930's and early 1940's, including the Greater London Plan of 1944.

3.1.4 The original proposals were that the Green Belt should form a relatively narrow area of land or a series of green spaces around London.

*"Implementation [of the Green Belt] started in 1938 with the passing of the Green Belt (London and Home Counties) Act. This enabled the LCC [London County Council] to start buying land for the proposed encircling park. It was not intended to be a continuous circular area but rather a series of green spaces around London, publically owned and accessible to Londoners. Some 8,000 hectares had been bought by 1939 with another 12,150 immediately after the Second World War. This land was safeguarded absolutely from development" (source: The Green Belt: A Place for Londoners, 2015, London First)*

## **3.2 TOWN & COUNTRY PLANNING ACT 1947**

3.2.1 The Town and Country Planning Act 1947 was a defining act in the planning and control of development. It allowed for two main changes to previous laws that still define planning today:

- The Act requires planning permission for development of land, rather than land ownership alone conferring development rights; and
- It reformed the number of planning authorities, imposing a duty to prepare strategic development plans for each planning authority area.

3.2.2 The Act also allowed provision for the designation of Green Belt land and also coincided with the New Towns Act 1946, which sought to promote new settlements away from the southeast of England.

3.2.3 Whilst the 1947 Act allowed planning authorities to designate areas as Green Belt, the first Green Belts were not formally implemented until 1955, by the Conservative Minister for Housing, Duncan Sandys. At this time the purpose of the Green Belt fundamentally changed:

*"This was not as a relatively narrow band of park land around London to provide public open space and recreation, as per the original vision, but rather as a barrier to London's expansion. The Minister 'indicated that even if...neither green nor particularly attractive scenically, the major function of the Greenbelt was...to stop further urban development' (source: The Green Belt: A Place for Londoners, 2015, London First)*

## **3.3 1955 ONWARDS**

3.3.1 Given the implementation of Green Belt policy from 1955 onwards, the purpose of Green Belt had been redefined to that of controlling urban growth, rather than focusing on recreational function. In 1955, this was reinforced via guidance contained in Circular 42/55.

3.3.2 With reference to Section 3.5 below, 'Planning Policy Guidance 2: Green Belt' stated that *"the*

*codification of Green Belt policy and its extension to areas other than London came in 1955 with an historic circular inviting local planning authorities to consider the establishment of Green Belts”.*

3.3.3 As areas of Green Belt became increasingly designated by local authorities, throughout the 1950's and 1960's, the London Metropolitan Green Belt progressively expanded outwards (increasing in area), enveloping many large built up areas outside of London. Rather than being a belt of land around London, by the end of the 1970's the London Metropolitan Green Belt had expanded such that it extended to three times the area of Greater London. As the area of designated Green Belt increased, it overlapped several boroughs including Brentwood, in its entirety.

3.3.4 This expansion was in recognition that the Green Belt was not just about preventing the outwards expansion of London, but also recognising the proximity of other towns in relation to the Greater London area and the need to prevent them from merging with Greater London.

### **3.4 MODERN DAY CONTEXT**

3.4.1 In January 2010, CPRE and Natural England commissioned a joint report entitled 'Green Belts: A Greener Future'. This included key facts and information about The London (Metropolitan) Green Belt:

- *It is the largest of England's 14 Green Belts, covering 30% of the total area of all Green Belt land in England.*
- *92% of the Metropolitan Green Belt land is undeveloped land, but only 58% of the land is registered as being in agricultural use (compared with 71% of all land in England). There is a high prevalence of 'semi-urban' uses relying on open land, such as catteries, golf courses and pony paddocks.*
- *The Metropolitan Green Belt has a significant proportion (5,380 ha) of farmland covered by Higher Level Stewardship schemes, but a low overall proportion (51% of all land in agricultural use) of involvement in Natural England funding supporting environmentally sensitive farming ('agri-environment schemes'; the national proportion is 67%; Green Belt land overall 53%).*
- *It contains particularly important resources of both public rights of way (9,899 kilometres, or 20 metres per hectare) and woodland (18% of the overall land area). Landscape quality is being maintained in 55% of the area.*
- *This Green Belt is the most under pressure of any from proposals for new development, both in terms of infrastructure such as airports and transmission lines, and new housing.*

3.4.2 This information sets the modern day context for the London Green Belt. It is evident that the London Metropolitan Green Belt is not untouched countryside. It comprises a landscape under pressure. Whilst 92% of the Green Belt land is 'undeveloped' from an urban perspective, only 58% of land is in agricultural use. There is much pressure on the Green Belt particularly from semi-urban land uses and recreational facilities (e.g. Golf Courses). This in part reflects the relationship between urban areas within and near to Green Belt and the wider countryside and the accessibility of Green Belt land to local people.



- 3.4.3 The 2010 document asks what people would like to see more of in the Green Belt and it is reported that the public in London generally responded with more nature reserves, woodland walks and new parks. This again indicates emerging public aspirations for the Green Belt, rather than it being merely a spatial planning tool.
- 3.4.4 Currently between 13% and 22% of London’s Green Belt provides space for amenity, recreation and access.
- 3.4.5 Therefore, it is considered that the London Metropolitan Green Belt has a number of multifunctional facets including;
- Preventing the urban sprawl of London;
  - Preventing the urban sprawl of neighbouring towns which would harm openness of intervening land and encourage settlement coalescence; and
  - Increasing recreational pressures as the population in and around London continues to grow, where there is increasing accessibility to the countryside and aspiration for recreational and green space access not necessarily afforded in ‘urban’ areas.
- 3.4.6 This is further complicated by competing land use demands in terms of agriculture, nature conservation and recreational demands.
- 3.4.7 However, as policy tool, it is generally accepted that Green Belt has achieved its aim of preventing urban sprawl and preventing settlement coalescence, preserving open areas of land between settlements: *“The Green Belt has served its post-war purpose well of preventing urban sprawl and the coalescence of towns and cities” (Merrick Denton-Thompson president of the Landscape Institute, October 2016).*

## **3.5 RECENT AND CURRENT PLANNING POLICY OVERVIEW**

### **PLANNING POLICY GUIDANCE 2: GREEN BELTS**

- 3.5.1 From around 1988 to 2012, planning policy in relation to Green Belt was guided by PPG2, which stated:

*Planning Policy Guidance 2 (‘PPG2’) outlines the history and extent of Green Belts and explains their purposes. It describes how Green Belts are designated and their land safeguarded. Green Belt land-use objectives are outlined and the presumption against inappropriate development is set out.*

- 3.5.2 PPG2 defined the aim and purposes of the Green Belt land in planning policy terms:

*“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness. Green Belts can shape patterns of urban development at sub-regional and regional scale, and help to ensure that development occurs in locations allocated in development plans. They help to protect the countryside, be it in agricultural, forestry or other use. They can assist in moving towards more sustainable patterns of urban development (see paragraph 2.10).*

*There are five purposes of including land in Green Belts:*

1. *to check the unrestricted sprawl of large built-up areas;*
2. *to prevent neighbouring towns from merging into one another;*
3. *to assist in safeguarding the countryside from encroachment;*
4. *to preserve the setting and special character of historic towns; and*
5. *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

3.5.3 Additionally, PPG2 further defined the ‘use’ of land in Green Belts:

*“Once Green Belts have been defined, the use of land in them has a positive role to play in fulfilling the following objectives:*

- *to provide opportunities for access to the open countryside for the urban population;*
- *to provide opportunities for outdoor sport and outdoor 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.*

*The extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt, or in its continued protection. For example, although Green Belts often contain areas of attractive landscape, the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection. The purposes of including land in Green Belts are of paramount importance to their continued protection, and should take precedence over the land use objectives.”*

3.5.4 PPG2 also made clear that Green Belt boundaries were permanent and could only be ‘*altered in exceptional circumstances*’. There was a presumption against inappropriate development (anything considered harmful to the purposes of the Green Belt), with a number of exceptions which need not necessarily be inappropriate in the Green Belt, e.g. minerals development.

3.5.5 As such, PPG2 set out much of the modern day public understanding of the purposes and aims of the Green Belt.

### **NATIONAL PLANNING POLICY FRAMEWORK (2012)**

3.5.6 PPG2 was officially revoked in 2012 when the National Planning Policy Framework (‘NPPF’) was adopted. The NPPF incorporated much of the guidance from PPG2, but arguably provided greater focus on the purposes of the Green Belt without emphasising land use objectives.

3.5.7 Section 9 of the NPPF set out national planning policy on ‘Protecting Green Belt land’:

*“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.*

*Green Belt serves five purposes:*

- 1. to check the unrestricted sprawl of large built-up areas;*
- 2. to prevent neighbouring towns merging into one another;*
- 3. to assist in safeguarding the countryside from encroachment;*
- 4. to preserve the setting and special character of historic towns; and*
- 5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

*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.”*

- 3.5.8 The NPPF made clear that the extent of Green Belt in England is largely established and new Green Belt should only be created in exceptional circumstances. The key principle that local authorities are required to adhere to is:

*“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”*

- 3.5.9 The NPPF also reiterated what types of development are also not inappropriate in the Green Belt.

- 3.5.10 Green Belt policy should also be read in the context that the NPPF recognised that it is important to provide *“the supply of housing required to meet the needs of present and future generations”*. New housing development and urban growth is not considered appropriate development in the Green Belt. This is a fundamental planning consideration that requires strategic planning decisions by local authorities to balance the level of housing provision required and protecting the Green Belt.

### **REVISED NATIONAL PLANNING POLICY FRAMEWORK (2018)**

- 3.5.11 In July 2018, a revised NPPF was published by the Ministry of Housing, Communities and Local Government, implementing the reforms previously announced through the Governments’ Housing White Paper and subsequent consultations on boosting housing supply (refer to Section 4.1 for further details). The revised NPPF forms current national planning policy in England and supersedes the previous 2012 NPPF.

- 3.5.12 Through the revised NPPF, Green Belt policy was updated and formed Section 13 of the document. The five purposes of the Green Belt have remained unchanged and Paragraph 133 reiterates *“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”*.

3.5.13 Importantly, national Green Belt policy has been updated to reflect wider updates to the NPPF relating to the Housing White Paper 2017 and this is reflected in Paragraphs 135 to 139 of the NPPF, as set out below. These paragraphs also cover national planning policy in respect of defining Green Belt boundaries and it is noted that changes to Green Belt can only be made by a strategic 'policy-making' authority, through the preparation of 'local' plans, in 'exceptional circumstances' that have been fully justified in line with wider policy.

*"135. The general extent of Green Belts across the country is already established. 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. Any proposals for new Green Belts should be set out in strategic policies, which should:*

- a) demonstrate why normal planning and development management policies would not be adequate;*
- b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- c) show what the consequences of the proposal would be for sustainable development;*
- d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and*
- e) show how the Green Belt would meet the other objectives of the Framework.*

*136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans. [underline our emphasis]*

*137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy: [underline our emphasis]*

- a) makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

*138. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable*

*patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. [underline our emphasis]*

139. When defining Green Belt boundaries, plans should:

- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
- b) not include land which it is unnecessary to keep permanently open;
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent".

### **3.6 BRENTWOOD REPLACEMENT LOCAL PLAN – SAVED POLICIES (AUGUST 2008)**

3.6.1 Current extant local planning policy in Brentwood is defined by the saved policies of the Brentwood Replacement Local Plan. There are a number of policies relating to Green Belt, but the overarching policy position in the extant local plan is defined by Policy GB1 New Development:

*"Within the Green Belt, as defined on the proposals map, planning permission will not be given, except in very special circumstances, for changes of use of land or the construction of new buildings or extension of existing buildings, for purposes other than those appropriate to a green belt, or for the re-use of existing buildings that do not comply with the criteria set out in policies GB15 and GB16.*

*All proposals will additionally, where they apply, be judged against the other policies in this plan".*

3.6.2 Policy GB2 (Development Criteria) requires that:

*"When considering proposals for development in the Green Belt, the local planning authority will need to be satisfied that they do not conflict with the purposes of including land in the green belt and do not harm the openness of the green belt".*

## 4 LONDON GREEN BELT AND THE FUTURE

### 4.1 HOUSING WHITE PAPER 2017

4.1.1 Government published the Housing White Paper in February 2017 – ‘Fixing our broken housing market’.

4.1.2 Two key parts of the White Paper are ‘Planning for the right homes in the right places’ and ‘Building Homes Faster’. The Government makes a number of proposals which, in summary, are considered to focus on:

- Ensuring every local authority has an up to date local plan;
- Ensuring the housing requirements of all local authority areas are fully accounted for and can be delivered;
- Ensuring land can be released for housing development;
- Ensuring both developers and local authorities can be held to account to ensure housing numbers are delivered; and
- Improving the affordability and diversity of the housing market

4.1.3 The Government proposes to *“maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements”*.

4.1.4 It is clear that Greater London and neighbouring authorities are subject to greater demand for housing with associated pressures on the availability of developable land.

4.1.5 The purpose of the London Metropolitan Green Belt has been to restrict the expansion of outward growth of Greater London and neighbouring towns (within the Green Belt), whilst encouraging regeneration of previously developed areas. Depending on the availability of Brownfield land for redevelopment, it is recognised that the purposes of the Green Belt can also conflict with local planning requirements relating to the supply of housing and other development growth. Planning authorities must seek to address such conflicts through the development of their local plans and strategic / spatial planning decisions.

#### **Planning for the right homes in the right places: consultation proposals**

4.1.6 Further to the White Paper, Government undertook a consultation between 14<sup>th</sup> September 2017 and 9<sup>th</sup> November 2017 on *‘further measures set out in the housing white paper to boost housing supply in England’*. The consultation set out new proposals in relation to calculating housing need.

4.1.7 In relation to Green Belt the consultation makes a number of statements:

*“The housing White Paper ...reiterated strong protections for the Green Belt and other environmental designations, and set out proposals to make sure that we build high quality homes in which people want to live...”*

*“The National Planning Policy Framework is clear that, to enable effective planning of new homes, local planning authorities should start the plan-making process with a clear understanding of the number of new homes that they need in their area. While this is an essential first step, it is not the only stage in the process. Local planning authorities then need to determine whether there are any environmental designations or other physical or policy constraints which prevent them from meeting this housing need. These include, but are not limited to, Ancient Woodland, **the Green Belt**, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest...” [underline our emphasis]*

*“This new method for assessing local housing need will affect individual authorities differently. Alongside this consultation document, we are publishing the housing need for each local planning authority using our method, on the basis of current data (average household growth for 2016 to 2026 and house price to earnings ratios for 2016). It also sets out, indicatively, the extent to which land in each local authority area is covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. This is for illustrative purposes only - the data informing this new method is based on the most up-to-date information available at the time of publishing this consultation document, and will change between now and when local authorities produce plans.” [underline our emphasis]*

*“Local planning authorities without an up-to-date local plan or spatial development strategy would not be able to factor land constraints into the baseline for establishing their five year land supply. However, when determining individual planning applications, the decision-maker will still need to take account of all policies in the National Planning Policy Framework, including those which restrict development (such as Green Belt and Ancient Woodland).”*

- 4.1.8 Notwithstanding housing need, Local Planning Authorities must also strategically plan for employment use, infrastructure, health and education provision and gypsy and traveller requirements.
- 4.1.9 As such, in relation to the London Metropolitan Green Belt, local authorities must plan positively to meet their Objectively Assessed Housing Need (and other development requirements), whilst recognising that the Green Belt is a constraint and restricts development. When preparing new Development Plans, Local Planning Authorities must comply with national policy and guidance in relation to Green Belt whilst balancing housing need requirements and other development requirements.
- 4.1.10 Therefore, it is considered that Purpose 5 of the Green Belt (see 3.5.7) remains a critical spatial planning consideration at the outset of the Local Plan-making process, in that Local Plans should encourage urban regeneration and the recycling of derelict and other urban land by ensuring all housing is directed to non-Green Belt land in the first instance.

## **4.2 COMMENTARY ON POTENTIAL FUTURE OF THE GREEN BELT**

4.2.1 The Greater London Authority has published a series of population and household projections for the coming years. Key findings include:

- *Based on the short-term migration scenario the total population of Greater London is projected to rise by 2.35 million between 2014 and 2041 to reach 10.89 million. In*

*comparison the long-term migration scenario projects a rise of 1.96 million to reach 10.50 million by 2041.*

- *London's population is projected to reach 10 million in 2029 under the short-term scenario and 2033 under the long-term scenario.*
- *All boroughs are projected to see a rise in their population between 2014 and 2041 under both sets of projections. Under the short-term migration scenario, this proportional rise is projected to be greatest in Barking and Dagenham (a rise of 40.1 per cent) and lowest in Kensington & Chelsea (11.5 per cent). For the long-term scenario, Redbridge (31.8 per cent) and Islington (15.1 per cent) are projected to see the highest and lowest levels of growth respectively. City of London is excluded from these figures.*

*(Source: <https://www.london.gov.uk/what-we-do/research-and-analysis/people-and-communities/population-projections> accessed 08/11/17)*

4.2.2 There is ongoing debate as to how the projected population increases can be accommodated in and around London in terms of housing and wider development requirements (including infrastructure). Part of this debate relates to protection of the London Metropolitan Green Belt, its future and how far it currently constrains development required to serve the projected population increases in London (and neighbouring authority areas).

4.2.3 In 2014 the London Society, who in 1919 promoted the concept of the Green Belt, published "*Green Sprawl – our current affection for a preservation myth*" in which it was argued that new development will require land currently within the London Metropolitan Green Belt. In 2016, they published "*Re/Shaping London: Unlocking Sustainable Growth in West London and Beyond*" which the London Society states:

*"...sets out a radical agenda for change across England. It includes proposals for a new 'Green Web' to be introduced to replace the 'Green Belt'. Exploring the scope for change in the west of the capital, suggesting that a West London 'Green Web' could alone accommodate 100,000 new homes (equivalent to four new towns!) and includes demands for a new Garden City at Northolt Airport, new suburban railway and suburban densification".*

4.2.4 The report author states that "*Designation of a Green Web in London would involve the transformation and modernisation of land currently defined as Green Belt to secure a multi-function Green Infrastructure landscape*".

4.2.5 In January 2016, The Adam Smith Institute released papers stating:

- *London and surrounding counties need at least one million new homes in the next ten years to meet housing demand, and to stop rents and house prices from soaring higher.*
- *Many of these new homes will have to come on greenfield or Green Belt sites because not enough suitable brownfield land exists; we estimate that this will require roughly 20,000 hectares of green belt space.*
- *Almost the full amount of space (20,000ha) can be found within a 10 minute walk – 800m – of existing commuter train stations.*
- *This paper explores some of the best areas to build on low quality Green Belt around*



*London. Locations include: East of Theydon Bois station, around Redbridge, Pinner Park Farm in Harrow, and some of the hundreds of Green Belt golf courses.*

*(Source: <https://www.adamsmith.org/news/press-release-new-paper-reveals-where-londons-green-belt-must-be-built-on-to-curtailed-housing-crisis> accessed 08/11/17)*

- 4.2.6 The Landscape Institute (a royal chartered professional body) has agreed that Green Belt should be a key policy priority in the future. It commissioned the ‘Future of the Green Belt’ member consultation in 2015. This raised a number of policy considerations in terms of how Green Belt policy develops in the 21<sup>st</sup> Century, noting the competing pressures for housing growth and that it was likely that Green Belt release would be required to meet housing demands.
- 4.2.7 Work by the Landscape Institute is ongoing but, in brief, they wish to collaborate across the built environment professions to ensure Green Belt is fit for the 21st Century and plan for a *“positive and strengthened Green Belt that can deliver a multi-functional landscape”* (Merrick Denton-Thompson president of the Landscape Institute, October 2016). Key questions the Landscape Institute raise are in relation to opportunities for the Green Belt including building on existing protections, promoting sustainable development, green infrastructure led approaches and the need for Green Belt management plans.
- 4.2.8 In 2015, London First, published *“The Green Belt: A Place for Londoners”*. In this, it was concluded that:
- “London must continue to protect its valuable green spaces and beautiful open countryside but this is wholly compatible with seeing how the Green Belt can play a small part in helping to accommodate the new homes that London needs.*
- 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 re-designating a small fraction for new homes”.*
- 4.2.9 Whilst there are a number of ‘progressive’ discussions in relation to how the Green Belt is considered moving forward, in the context of development pressures, it should be noted that extant national planning policy states *“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”*.
- 4.2.10 Government still seeks to ensure strong protections for the Green Belt and the policy designation is highlighted as a key consideration and constraint to development.
- 4.2.11 A Private Members Bill is expected to have its second reading in Parliament on 1<sup>st</sup> December 2017. The Green Belt (Protection) Bill 2017-19 seeks to establish a *“national register of green belt land in England; to restrict the ability of local authorities to de-designate green belt land; to make provision about future development of de-designated green belt land; and for connected purposes”*.
- 4.2.12 In July 2017, CPRE published *“Green Belt Under Siege”*. In the report, CPRE research indicates that:
- *housing development proposed for the Green Belt in local plans has shot up by another 150,000 to 425,000 houses since our previous report (March 2016) the number of planning applications being approved year on year on greenfield sites in the Green Belt has nearly*

*doubled since the NPPF came into force in 2012*

- *Green Belt boundaries are now being changed to accommodate housing at the fastest rate for at least two decades*
- *at least 800 hectares of greenfield land in the Green Belt have been developed for a range of commercial or industrial projects, such as offices or retail parks, since 2009*
- *nearly three-quarters of the housing proposed on land to be released from the Green Belt will be unaffordable for most people living in the local area: planning consultants Glenigan found only 16% of homes built in Green Belt since 2009 were affordable*
- *with the New Homes Bonus, the Government is providing financial incentives that significantly increase Green Belt release and development, contrary to its own commitments.*

4.2.13 CPRE recommends that Government should:

- *make it clearer that unnecessary or major losses of Green Belt should be avoided;*
- *make sure that Green Belt boundaries are reviewed no more than every 15 years –the recommended life of a typical local plan;*
- *reaffirm that high levels of housing demand or housing targets do not in themselves amount to the “exceptional circumstances” required to justify changing Green Belt boundaries;*
- *abandon current methods of calculating housing need that serve to unrealistically inflate housebuilding requirements, such as adjustments to account for so-called “market signals”;*
- *where there is a particularly acute need for affordable housing in Green Belt areas to meet local needs, give more support to small scale, locally led “rural exception site” schemes that are well designed to minimise Green Belt harm; and*
- *remove New Homes Bonus funding from development in the Green Belt, and nationally protected landscapes, that either does not meet local needs (as clearly distinct from market demand) or does not involve the regeneration of suitable brownfield land.*

4.2.14 The London Green Belt Council is calling for a halt to the wide-scale release of London’s Green Belt and halt the number of ‘Green Belt Reviews’. They consider housing target assessments are flawed and state that *“there are 218,000 planning permissions yet to be built and swathes of brownfield land which could accommodate at least 300,000 homes in London alone lying idle”* (Source: <https://londongreenbeltcouncil.org.uk/our-message/> accessed 10/11/17).

4.2.15 Such competing pressures are also in the context that whatever the relationship between housing and the Green Belt, there are also pressures, from an increasing population, on access to green space and countryside recreation. Historically, the aspirations for and public perception of the Green Belt has become increasingly linked to recreation and rural pursuits, in part due to the policy position advocated in PPG2, in terms of objectives for Green Belt improvements.

## 5 SUMMARY AND CONCLUSION

- 5.1.1 This report does not advocate any policy position in relation to the Green Belt. The purpose of the report is to outline the context of the history and implementation of Green Belt policy, and the context of the London Metropolitan Green Belt within which Brentwood Borough is wholly located.
- 5.1.2 The role and implementation of the Green Belt has evolved over many years, both in terms of its development planning function but also public perception and expectations. The London Metropolitan Green Belt has grown significantly since 1955 and is a policy consideration for numerous Local Planning Authorities.
- 5.1.3 It is clear that there are competing pressures between the protection of the Green Belt and ensuring the supply of housing (and other development requirements), particularly in relation to high growth areas around London.
- 5.1.4 This is the context against which the new Brentwood Local Plan is being developed. The local plan requires a balanced approach which accounts for Objectively Assessed Housing Need, whilst protecting the function and purposes of the Green Belt. It should be recognised that the London Metropolitan Green Belt currently has a number of multifunctional facets including (but not limited to):
- Preventing the urban sprawl of London;
  - Preventing the urban sprawl of neighbouring towns which would harm openness of intervening land and encourage settlement coalescence; and
  - Increasing recreational pressures as the population in an around London continues to grow, where there is increasing accessibility to the countryside and aspiration for recreational and green space access not necessarily afforded in 'urban' areas.
- 5.1.5 The new Brentwood Local Plan must accord with the requirement of the NPPF (2018) and the Housing White Paper 2017 reaffirms that Government proposes to:
- "maintain existing strong protections for the Green Belt, and clarify that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements".*
- 5.1.6 Therefore, it is considered that Purpose 5 of the Green Belt (see 3.5.7) remains a critical spatial planning consideration at the outset of the Local Plan-making process, in that Local Plans should encourage urban regeneration and the recycling of derelict and other urban land by ensuring all development is directed to non-Green Belt land in the first instance.
- 5.1.7 However, options for development must also take account of various sustainability criteria, strategic priorities and infrastructure requirements, noting that around 10% of Brentwood Borough is previously developed and 89% of the borough is Green Belt. In order to strategically plan for development over the period 2013-2033, the emerging local plan needs to consider both the capacity of the existing settled areas to accommodate new development (including regeneration potential), as well as the wider capacity of Brentwood Borough as a whole.