



Campaign to Protect
Rural England

GREEN BELTS – ROBUSTLY PROTECTED OR UNDER THREAT?

A CPRE briefing

May 2008

Summary

The Government has repeatedly stated its commitment to protecting the Green Belt. John Prescott pledged to Parliament on 5 February 2003 that he would maintain or grow the Green Belt in every region. On 11 July 2007, Gordon Brown, on becoming Prime Minister, announced that the Government would ‘continue to protect robustly the land designated as Green Belt’.¹ There have also been supportive statements in the Government’s Planning White Paper (May 2007). But how is the Government’s commitment to Green Belt being delivered across the country? This briefing paints a worrying picture.

Green Belt gain

A large area (47,300 hectares) of Green Belt in the South East has been re-designated as the New Forest National Park, which CPRE has strongly welcomed. The Communities and Local Government’s (CLG) most recent Green Belt statistical release, issued in January 2008, shows that since 2004 the total Green Belt area has grown in the North East, North West, South West and in Yorkshire and the Humber. Significant new areas of Green Belt have been created in Durham and to the west of Newcastle since 1997 – in part a result of CPRE’s efforts. Otherwise, most of the increase appears to be due to more reliable mapping by local authorities of Green Belt land where the boundaries were already well-established, such as in Bath and North East Somerset. The statistics also show, however, that since 2004 the total Green Belt area has shrunk in East Anglia, and in the East and West Midlands.

Green Belt pain

Yet, there is also a more worrying trend of significant losses of Green Belt land to development. Between 1997 and 2003 an average of 1,100 hectares – nearly four square miles – was lost each year. From 1997-2005, 45,240 new dwellings were permitted on Green Belt land. The Government approved development involving the loss of 1,300 hectares between 1997 and 2001. Since the creation of CLG in May 2006, the Secretary of State has decided 48 planning applications involving development in the Green Belt. From these, 16 significant developments, involving the loss of at least 450 hectares of Green Belt, have been allowed.

This loss of Green Belt land raises serious questions about the Government’s commitment to Green Belt policy in practice, despite overall gains in areas of Green Belt in some regions. The strength of Green Belt policy can only be measured by the extent to which it is protected where it is under the most pressure – on the urban edge. The evidence presented here suggests that by this measure Green Belt policy is being seriously weakened.

CPRE is concerned that emerging regional plans will lead to further significant losses of Green Belt land in the years to come. These will particularly affect those parts of the Green Belt nearest to our major towns and cities that we need the most. This briefing paper sets out current examples of particularly significant development threats to Green Belts across England.

¹ House of Commons Hansard 11 July 2007, column 1450.

EAST OF ENGLAND

Hertfordshire and Essex - Metropolitan Green Belt

>Changes proposed through the Regional Spatial Strategy

The Secretary of State's proposed changes to the East of England Plan, which was under consultation until March 2007, calls for revisions to Green Belt boundaries to accommodate housing in East Hertfordshire to the north of Harlow; Dacorum / St. Albans Districts; Welwyn Hatfield District; and Stevenage.

- **East Hertfordshire District.** North of Harlow: 10,000 new dwellings by 2021 (and possibly a further 10,000 in the longer term).
- **Dacorum District.** Expansion around Hemel Hempstead, possibly extending eastwards into St Albans District nearly up to the M1. Includes 3,200 dwellings in Green Belt by 2021 and a possible further 2,500 in Green Belt by 2031.²
- **Welwyn Hatfield District.** An additional 3,900 dwellings to be provided in Green Belt by 2021, probably mainly to the west of Welwyn Garden City / Hatfield, extending into St Albans District (details to be worked out in Local Development Documents).³
- **Stevenage and North Hertfordshire Districts.** The draft East of England Plan calls for urban extensions to provide 16,000 dwellings by 2021 to the west and north of Stevenage. 5,700 of these dwellings can be provided by completions, commitments and further development within Stevenage's boundary, leaving 10,300 to be provided on Green Belt land, mainly in North Hertfordshire District – known as the SNAP⁴ area. 5,000 of the 10,300 will be in the West of Stevenage area which already has 'minded to approve' permission from the Secretary of State for 3,600 dwellings. Stevenage Borough Council assumes a further 7,000 dwellings will be required in the SNAP area by 2031 to fulfil the regional requirement for 'continued growth of the Stevenage built up area'.

There will also be a 'local review' of Green Belt at Broxbourne (Hertfordshire), and the option of a strategic review at Chelmsford (Essex), if this is found locally to be the most sustainable option.

In Hertfordshire, a number of local authorities are including Green Belt land as part of their 'areas of search' within the Local Development Framework process. For example, St Albans District Council included eight significant housing site options within its consultation document in August 2007.

Green Belt boundaries are also being reviewed in one of the Government's key 'growth areas' in and around the Upper Lee Valley, Bishop's Stortford, Thurrock, and South Essex (in the Thames Gateway growth area).

² Provisional East of England Plan requires housing growth of 12,000 in Dacorum, mainly around Hemel Hempstead, by 2021 and a further assumed 6,000 by 2031. Of this total of 18,000, 5,700 would be in Green Belt.

³ Draft East of England Plan requirement of 5,800 dwellings by 2021 for Welwyn Hatfield increased to 10,000 by East of England Plan Proposed Changes. Of this additional 4,200 the Council estimates 3,900 would have to be in Green Belt.

⁴ SNAP = Stevenage and North Herts Action Plan.

Cambridge

The Cambridge Green Belt Review Report was published in 2005, and a Preferred Options Paper is due to be published by the City Council in spring 2008. The Planning Inspectorate has called on South Cambridgeshire District Council to raise its housebuilding targets by 1,600 dwellings. This may lead to further encroachment on Green Belt land.

>Individual developments

The Secretary of State granted permission for Southend United Football Club's new stadium in March 2008. While the stadium itself will not be in the Green Belt, the adjoining training pitches will be.

At the former Radlett Aerodrome site in St Albans District, a planning application was submitted in July 2006 by Helioslough Ltd for a Strategic Rail Freight Interchange comprising 330,000 sq metres of distribution buildings with associated road, rail and other infrastructure and parking for 1,665 cars and 617 lorries. Total area 172 hectares. The application was refused by the local planning authority on 19 February 2007 but the applicant has appealed against this decision. A public inquiry has been held. The inspector's report is, according to local press reports in March 2008, not likely to be submitted to the Secretary of State until the autumn.

South Bedfordshire Green Belt (including North Hertfordshire)

>Changes proposed through the Regional Spatial Strategy and Local Development Frameworks

Green Belt boundaries are also being reviewed in another of the Government's key 'growth areas' in and around Luton, Dunstable, Houghton Regis, Leighton Buzzard and Linslade (in the Milton Keynes and South Midlands growth area).

As a consequence, South Bedfordshire and Luton are required to take 27,300 new dwellings until 2021, and then a further 15,700 to 2031, under the Milton Keynes and South Midlands Sub-Regional Strategy. Around 75% of these dwellings (a figure of 32,250) would need to be built on Green Belt land.

A review of Green Belt boundaries at Leighton Buzzard is prescribed but yet to take place. The district council has received a scoping report for a proposed development with plans for 4,000 houses. The site to the east of Leighton Buzzard would cover approximately 600 acres of Green Belt and submission of plans is expected shortly.

The Milton Keynes South Midlands Sub-Regional Strategy (March 2005) identified an area in North Hertfordshire around the villages of Cockernhoe and Mangrove Green as a reserve housing site to meet Luton's needs. This area is all Green Belt. The subsequent Luton and South Bedfordshire Core Strategy Issues and Options document (September 2007) included this area (300 hectares) as one of the options for development. Bloor Homes has produced proposals for 3-4,000 houses in this area, and is pressing for this to be confirmed in the forthcoming Core Strategy Preferred Options.

The South East Plan Panel Report also argued strongly against CPRE's calls for the designation of a Green Belt around Milton Keynes, a city which is due to expand significantly as a result of the Sub-Regional Strategy.

>*Individual developments*

Finally, a controversial application by Center Parcs to develop a new leisure village on 148 hectares of Green Belt in Bedfordshire was approved by the Secretary of State in summer 2007.

THE GOVERNMENT SAYS THAT GREEN BELT IS PERMANENT – BUT IS IT?

The boundaries of the Metropolitan Green Belt are being reviewed, or being weakened, in 18 separate locations.

(Robin Thompson Associates and Urban Studio, Approaches to Growth: Study of Sub-regions, Growth Proposals and Co-ordination in and around London, Final Report March 2008. Accessed from www.london.gov.uk on 18 April 2008.)

LONDON AND THE SOUTH EAST

Surrey - Metropolitan Green Belt

>*Changes proposed through the Regional Spatial Strategy and Local Development Frameworks*

The Panel Report of the Examination in Public of the draft South East Plan was published in August 2007. It has recommended 'selective reviews' of Green Belt boundaries in order to accommodate new housing development above that set out in the draft plan. The review will take place in three areas: Guildford, Reigate / Redhill, and Woking.

WHO MAKES GOVERNMENT GREEN BELT POLICY?

'Green Belts...have been treated as inviolate. This cannot be consistent with Government policy'.

South East Plan Examination in Public Panel Report, paragraph 5.60.

Localised reviews of the Green Belt are also to take place in six Surrey districts (Elmbridge, Epsom and Ewell, Mole Valley, Runnymede, Spelthorne and Tandridge), and in parts of Kent (Sevenoaks and Tunbridge Wells), Berkshire (Windsor and Maidenhead) and Buckinghamshire (Wycombe). The Windsor and Maidenhead review is likely to take place shortly, after the Planning Inspectorate ruled the Borough's strategy for housing development to be unsound in late 2007, requiring the Borough to identify additional land.

Greater London - Metropolitan Green Belt

>*Individual developments*

There have been two significant cases where the Secretary of State at CLG has recently permitted development that has caused significant harm to the Metropolitan Green Belt: a housing development on 10 hectares at Bromley Common, Bromley in November 2007; and the rail freight depot at Howbury Park, Bexley in December 2007, involving a loss of 155 hectares.

In Enfield, planning permission has been granted to Tottenham Hotspur Football Club to build a new training facility on the Green Belt, at a loss of 11 hectares of agricultural land, despite stiff opposition (November 2007).

Oxford Green Belt

The Panel Report into the draft South East Plan recommends a 'selective' review of the Oxford Green Belt in order to accommodate an urban extension of 4,000 homes on Green Belt land to the south of the city.

To the east of Oxford, an extension of the Thornhill Park and Ride in the Green Belt aims to create a Transport Hub. Informal consultation with stakeholders ended on 20 March. The planning application is expected in 2009.

Western Otmoor, a 15,000 home eco-town has been short-listed by the Secretary of State. Near Weston-on-the-Green, approximately 25% of the 800 hectare site lies within the Green Belt.

Oxford City Council has recently issued proposals to erect up to 20 wind turbines on four sites at Cuttleslowe, Hinksey, Horspath, and Sandford which will industrialise the Green Belt, harming its openness along with the famous views of the City.

EAST MIDLANDS

Nottingham and Derby Green Belt

The draft East Midlands Regional Spatial Strategy (RSS) proposes a major urban extension at Clifton, to the south of Nottingham. The draft RSS calls for Rushcliffe Borough Council to provide 8,900 dwellings in those parts of Borough either within (such as Clifton itself or West Bridgford) or adjoining the built up area of Nottingham, during the 20 year period of the plan.

WILL IT BE A GREEN BELT ANYMORE?

The Panel Report into the draft East Midlands RSS, issued in November 2007, proposes that land on all sides of Nottingham except the west should be removed from the Green Belt to accommodate urban extensions.

There is also the possibility of incursions into the Green Belt for new housing in the following districts in the later years of the plan: Amber Valley, Ashfield, Broxtowe, Erewash, Gedling and South Derbyshire.

Development plans for the Nottingham urban extension produced by Wilson Bowden propose 5,000 homes, 50 hectares of commercial space, a £90 million road widening scheme and a 50,000 capacity stadium for Nottingham Forest Football Club, along with an additional railway station and an extension to the light rail transit network (*Planning*, 29 June 2007).

Proposals have also been submitted for a 6,000 home eco-town covering 600 hectares of Green Belt agricultural land in Rushcliffe, on a site to the south west of Nottingham. The Government chose not to shortlist this proposal in April 2008, but the Borough Council has undertaken to search for a suitable site elsewhere within its boundaries, much (though not all) of which is in the Green Belt.

NORTH WEST

>Changes proposed through the Regional Spatial Strategy

The Government has generally shown a strong commitment to upholding the integrity of the Green Belt in the North West. Kate Barker's final *Report on Land Use Planning* in 2006, in an otherwise sceptical commentary on the value of Green Belts, highlighted the important role that the Green Belt plays in ensuring urban regeneration in this region. CPRE is highly concerned that the recent decision on the Heysham-M6 Link Road and proposals for boundary changes in the RSS to accommodate airport expansion (detailed below) could reflect a weakening of this support.

The Secretary of State's proposed changes to the Regional Spatial Strategy (RSS) were issued in March 2008, and makes it clear that there is no need for substantial strategic change to the Green Belt in Cheshire, Greater Manchester, Lancashire or Merseyside before 2011, or in Warrington before 2021. It also makes clear, following strong representations from CPRE at the Examination in Public, that there is a presumption against any change after that date.

The Secretary of State accepted the Panel's recommendation, in line with CPRE's arguments, that a new business park in the Green Belt outside Chester would be inappropriate. However, she does highlight that boundaries may have to change through the Local Development Framework process to accommodate airport expansions in Manchester and Liverpool.

A boundary change is also recommended to accommodate an inter-modal freight terminal in the Green Belt near Newton-le-Willows. The current planning application (submitted in July 2006, with additional information submitted in February 2008) is for a 270 hectares site, entirely within the Green Belt.

>Individual planning proposals

The Secretary of State has recently granted planning permission for a four-lane highway through tranquil countryside in the Lancaster and Fylde Coast Green Belt near Lancaster, which CPRE fought at a public inquiry in summer 2007. A legal challenge has been issued.

Another park and ride site may lead to loss of Green Belt outside Chester. The city council is proposing that a 1,200-car parking space development goes ahead, having already approved four earlier ones on Green Belt. CPRE Cheshire is campaigning for an existing park and ride at Chester Zoo to be used as an alternative to Green Belt intrusion at a new site.

SOUTH WEST

>Changes proposed through the Regional Spatial Strategy

The Draft Regional Spatial Strategy (RSS) for the South West was submitted to Government in April 2006. The Secretary of State is expected to publish proposed changes for consultation in the summer, following the Panel Report in January 2008.

Both the draft RSS and the Panel Report propose amending the general extent of all three Green Belts in the South West to allow a number of urban extensions to accommodate housing development. The draft RSS also proposed a number of extensions to the Green Belt to compensate for the land lost to urban extensions, but the Panel report rejected this proposal due to lack of justification. This was despite it being clear that the Report's recommendations and the draft RSS will lead to significant losses of Green Belt land.

South East Dorset Green Belt (Bournemouth / Poole)

Up to 8,550 dwellings could be built in the South East Dorset Green Belt.

The draft RSS proposes urban extensions on Green Belt land with 2,400 dwellings spread over sites at Corfe Mullen, Wimborne and Ferndown. 600 dwellings are also proposed on Green Belt land in Christchurch. Green Belt land may also be lost to employment uses at Bournemouth Airport and in Ferndown (the latter involving 20 hectares).

In addition to supporting the draft RSS proposals, the Panel Report also recommends an additional 1,500 urban extension at North Bournemouth, and an urban extension to Poole of 2,750 dwellings in Purbeck District. A further 1,000 dwellings are also recommended to be built on Green Belt land in semi-rural East Dorset.

Gloucester/Cheltenham

Changes proposed by the draft RSS to the boundaries of the Cheltenham and Gloucester Green Belt to accommodate urban extensions of 4,000 dwellings to the north west of Cheltenham; and 2,000 dwellings to the north of Gloucester were endorsed by the Panel, but, with the Panel proposing higher housing numbers, the extent of Green Belt loss is likely to be higher. CPRE believes that Green Belt incursions should only proceed once all brownfield development opportunities have been exhausted. Some development in the Green Belt is likely to take place in the medium to longer term in the locations proposed, and CPRE would prefer this to development leading to the coalescence of Cheltenham and Gloucester, or impinging on the Cotswolds Area of Outstanding Natural Beauty around Cheltenham. The draft RSS also included proposals for Green Belt extensions. These were rejected by the Panel as not being justified.

Avon Green Belt (surrounding Bristol and Bath)

In January 2008 the Panel rejected the extensions to the Green Belt proposed in the draft RSS due to a lack of justification, despite it being clear that the Report's recommendations and the draft RSS will lead to significant losses of Green Belt land. Six major changes to the boundaries of the Avon Green Belt had been proposed to accommodate the Bristol city-region's 'Growth Point' status.

EXCEPTIONAL CIRCUMSTANCES THAT HAPPEN EVERY DAY...

The South West Examination in Public Panel viewed the demand for housing as 'exceptional circumstances' warranting significant changes to Green Belt boundaries in Bath, Bristol, Cheltenham and Gloucester, and Bournemouth / Poole.

As part of the North Somerset Replacement Plan, the Panel upheld the exclusion of land to allow future development of the Royal Portbury Dock, with an extension north of the dock. The current operational boundary at Bristol International Airport covers 176 hectares of Green Belt plus a further 10 hectares immediately to the south of the airport.

The boundary changes will involve land being removed from the Green Belt for the expansion of both Bristol Airport to the north and Royal Portbury Dock to the south, as well as five urban extensions. Three are proposed around Bristol, to the south west (dwellings, 9,000 in Green Belt (1,500 of these in the Bristol boundary) covering 262 hectares), south east (6,000 dwellings, 150 hectares), and north (8,000 dwellings, 200 hectares); one at Keynsham, between Bristol and Bath (3,000 dwellings, 75 hectares); and one to the south west of Bath (1500 dwellings, 37 hectares).

The coverage figures assume an average density of 40 dwellings per hectare in each urban extension, but the actual amount of land involved is likely to be much higher due to the need for additional community facilities and road access. The impact will be still more far reaching, as the figure does not include the land taken for the airport or port extensions, or the

cumulative impact on the untouched Green Belt land of the noise, air and light pollution generated by all these developments.

The Panel Report suggested that the Bath urban extension could potentially go on Green Belt land to the south of the city that is also in the Cotswolds Area of Outstanding Natural Beauty.

The Secretary of State granted outline permission for 1,200 dwellings in Harry Stoke, near Filton in South Gloucestershire, overruling her inspector who recommended refusal, in December 2007. The road serving the new housing will be in the Green Belt, while the Secretary of State acknowledged that the housing will have a visual impact on the neighbouring Green Belt land.

Plans to extend Bath University were approved in the Bath and North East Somerset Local Plan. The Green Belt boundary will be redrawn to exclude two areas of land of nearly 12 hectares, with the University having already nibbled at a further 10 hectares in recent years for its sports training village. The University wants to build housing for up to 2,000 students as well as offices, teaching rooms and research facilities which will be subject to approval of a Campus Masterplan assessing the development capacity of the whole site and Green Belt land.

WEST MIDLANDS

West Midlands Green Belt

>Changes proposed through the Regional Spatial Strategy and Local Development Frameworks

The Preferred Option for Phase 2 of the West Midlands Regional Spatial Strategy (RSS) assumes 365,600 new dwellings will be built by 2026, 80,000 more than CPRE believes is sustainable. However, the Government is currently assessing how that could be raised still further to a range of between 408,000-460,000.

The RSS does not contain an estimate of how many dwellings would need to be built in the Green Belt, but we estimate that somewhere in the region of 1,000 hectares of Green Belt could be lost. If the higher Government figures are adopted this could be much worse. The figure for housing development would not include additional land for supporting uses such as roads, shops and schools.

The most significant Green Belt effects are likely to be in Coventry, Rugby, Nuneaton and Bedworth and Lichfield. Birmingham could also lose significant amounts of Green Belt, although the City Council claim that they can accommodate their proposed development without encroaching on the Green Belt based on a recent land availability survey whose results we have not seen.

The Preferred Option also includes plans for 150 hectares of large scale Logistics Sites. The locational requirements would mean these could well be in Green Belt, along the M6 Toll corridor and in South Staffordshire. More business parks could also come forward.

Another potential threat is identifying park and ride sites on the edge of the conurbation. Plans for a Western Orbital Road which would cut through large amounts of Green Belt to the west of the conurbation have been shelved but are still being promoted by Black Country interests. An M6 Toll – M54 Link Road and a Longbridge Link Road would both cut through Green Belt.

Phase 3 Revision of the RSS begins this year and Green Belt policy will be considered as part of this review, however the focus is on the quality of Green Belt rather than whether it should

be extended and we are concerned that this could lead to two classes of Green Belt with some more vulnerable as a result.

Coventry City Council announced in October 2007 that Green Belt land to the north west of the City is being considered as one option for new housing development in order to meet new Government targets for housing. The Council's preferred options for sites will be published in December.

West Midlands and Stoke-on-Trent Green Belts

>Individual planning proposals

We have been pleased with the Government's decisions on a number of major planning proposals which would have significantly damaged the Stoke-on-Trent and West Midlands Green Belts including decisions at Cheslyn Hay, Staffordshire (September 2006), Trentham, Stoke-on-Trent (February 2007), and the Weeford Island service station proposal near Lichfield (February 2007). However, none of these are of the scale of the potential losses threatened by the draft RSS.

The current application for a runway extension to Birmingham Airport would also affect up to 20 hectares of Green Belt in the sensitive Meriden Gap. However the previously threatened second runway, which would have taken large swathes of Green Belt land south of the airport, is now unlikely to be built (if at all) before 2030.

In June 2007 the University of Warwick, whose main campus is to the south of Coventry, announced plans for major expansion into surrounding Green Belt land already owned by the University. This would expand the size of the campus by 17 hectares or 40%.

YORKSHIRE

South and West Yorkshire Green Belt

>Changes proposed through the Regional Spatial Strategy and Local Development Frameworks

Consultation on proposed changes to the Yorkshire and Humber Draft Regional Spatial Strategy (RSS), incorporating the Panel Report, closed in December 2007. The Final RSS is expected in May 2008. The proposed changes support localised reviews of Green Belt boundaries through Local Development Frameworks. However, it poses a new threat to the Green Belt by stating that a strategic review may be required in order to deliver longer term housing growth in West Yorkshire. An annual average of over 10,000 new homes is forecast for West Yorkshire between 2008 and 2026. Significant growth and housebuilding is proposed in the Leeds City Region. The Plan suggests there may be a need to reconsider the extent of the Green Belt in order to meet development needs.

Calderdale Metropolitan Borough Council announced that it will carry out a review of its Green Belt in its November 2007 Local Development Scheme. Barnsley Metropolitan Borough Council has also published a Local Development Framework background paper, dated October 2005, on its website setting out justification for a review within its boundaries.

In Rotherham, the Borough Council lifted a moratorium on new housebuilding in the Green Belt at the end of February 2008, as has Doncaster Borough Council subsequently, with both claiming that there was no longer sufficient brownfield land available to meet Government housebuilding targets. Sheffield, however, has proposed no change to its Green Belt boundary in the draft Core Strategy (submitted for examination in September 2007).

In April 2008 the Secretary of State shortlisted a proposal for an eco-town of 15,000 dwellings, to be located at the former colliery town of Rossington. CPRE understands that 80% of the Rossington site (the remaining 20% of the site is covered by the former colliery) is in the Green Belt.

York Green Belt

>Individual developments

In May 2007 the Secretary of State granted permission for two housing developments in the Green Belt, totalling 1,150 dwellings, with 700 at Germany Beck and 450 on a site near Osbaldwick. The former will take up 34 hectares of Green Belt.

117 hectares of Green Belt around York will be lost as a result of York University gaining approval for its plans in May 2007. It will now be able to extend its campus into the Green Belt, build roads, provide parking spaces for 1,500 cars and creating a large business park.

CPRE

May 2008