

GREEN BELT: UNDER RENEWED THREAT?

**A CPRE Briefing Paper
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What is the problem?

Green Belt land covers 12.4% of England. In Green Belt areas there is strong protection against most forms of development. The designation was established in the 1950s and covers areas of mostly open land and countryside around the largest or most historic towns and cities. International comparisons suggest that without strong protection, these areas would have long since been lost to urban sprawl. In both the 2010 Coalition Agreement and the National Planning Policy Framework (NPPF), published in March 2012, the Government stated clearly that it attaches great importance to the Green Belt and that it will seek to maintain existing levels of protection. Yet, evidence gathered by CPRE shows that Green Belts are under threat across England.

Government commitments

The promise by the Secretary of State for Communities and Local Government, Eric Pickles MP, to abolish the Regional Spatial Strategies (RSSs) that, in his words, ‘worst of all threatened the destruction of the Green Belt’¹ has gone some way to being fulfilled. RSS policies which have led to proposals to develop Green Belt land in south Bristol and Hertfordshire have not been taken forward in more recent local plans.

Since coming into office Eric Pickles has used his powers to ‘call in’ and turn down major housing proposals in Gloucestershire (Innsworth, 1750 dwellings) and North Somerset (Failand, 500 dwellings) as well as proposals for a railfreight terminal near St Albans. In addition, Planning Inspectors have intervened against plans to develop 55 hectares of Green Belt land in Rochdale and 135 dwellings near Cheltenham. It is therefore to be hoped that some of the Green Belt areas threatened by RSSs are now safer than they were. But in many other areas, planners and developers continue to press for development in the Green Belt. They are often basing their plans on housing growth predictions taken from the old RSSs. They are also referring to the economic priorities set out in the new National Planning Policy Framework (NPPF) published in March this year.

The actual abolition of RSSs is taking much longer than originally expected, creating uncertainty for planning authorities about whether they still have to meet RSS housing targets. There are also onerous requirements in the NPPF on deliverable housing land supply and short term development viability. This means that Planning Inspectors are often requiring more evidence on housing requirements in local plans and pressing for higher housing land provision even where there is plenty of land available to meet the need for new housing.

¹ Department for Communities and Local Government press release, ‘Eric Pickles puts stop to flawed Regional Strategies today’, 6 July 2010.

The scale of threat

As a result, new threats have emerged in a number of locations across England. Possibly the most significant of these are in the areas of Birmingham and Manchester where Local Enterprise Partnerships are seeking to promote either major development in the Green Belt or a relaxation of policy in order to accommodate new development in the future.

Following the publication of the final NPPF, the Government appears to be taking a much less active role than before in ensuring that brownfield sites are developed before Green Belt or other greenfield land. Currently, planning applications which could have a big impact on the Green Belt are referred to Ministers (under Government Circular 02/2009), and have in many cases in the past been taken to a public inquiry. But a number of significant harmful developments in the Green Belt have recently been approved. They include:

- hotel development in connection with the expansion of Chester Zoo,
- a new leisure resort in Leatherhead, Surrey,
- two housing developments totalling 665 dwellings in Thurrock,
- warehouses near Wakefield connected to a proposed community stadium², and
- an out of town shopping centre in York.

Three of these cases (Chester, Leatherhead and York) were granted without a public inquiry.

Moreover, CPRE fears that the Government's 'red tape challenge' review of planning circulars (including Circular 02/2009) and other guidance, expected in September, could lead to Ministers ceasing to scrutinise major Green Belt planning applications altogether. Meanwhile, Planning Inspectors in four locations (Bath and North East Somerset; Halton borough around Widnes; Wigan; and Woking) are recommending the review or revision of Green Belt boundaries in areas with plenty of brownfield land available for development.

Reforms in the NPPF designed to encourage 'local transport infrastructure' in the Green Belt also appear to be having a significant effect. A number of new roads and/or park and ride schemes have recently been approved (in Lancashire and Nottinghamshire) or proposed, adding to concerns that the Government's early resolve in protecting the Green Belt may give way.

The overall picture

In total, at least 81,275 dwellings, plus seven new roads, and over 1,000 hectares of business parks and warehouses are set to be built in the Green Belt- equivalent a new town greater than the size of Slough. This figure is not a comprehensive list of all the Green Belt alterations that are currently proposed: for example, it does not include the proposals in RSSs which the Government has promised to abolish. All this is taking place while enough brownfield land remains available, according to the Government's own National Land Use Database, to accommodate over 1.5 million new dwellings³ and still more for commercial and industrial development.

² In the Wakefield case the Secretary of State has issued a 'minded to approve' decision subject to the successful conclusion of a planning agreement regarding the community stadium. For more details see the table below.

³ For more details see CPRE, *Building on a Small Island*, 2011.

Green Belt threats by region

East Midlands: Nottinghamshire

A453 widening granted planning permission. On 30 March 2012 Eric Pickles and Justine Greening (the latter is Secretary of State for Transport) allowed the widening of the A453 along a 9km stretch through the Green Belt south of Nottingham to the M1 motorway. According to the Environmental Statement produced by the Highways Agency that is developing the road, the new road will cut through the largely open landscape of the Nottinghamshire Wolds, leading to the loss of 59 ha of farmland, and increased levels of noise pollution. Despite this, the Secretaries of State ruled that the road would have no impact on the openness of the Green Belt.

Broxtowe: consultation on 3,000 new dwellings. The draft 'Aligned Core Strategy' for the district, between Nottingham and Derby, published in June 2012, proposes releasing land from the Green Belt at a number of locations, including at Brinsley and Stapleford.

Broxtowe: consultation on open cast coal mining. UK Coal has submitted an application for an opencast mine in Green Belt land between Ilkeston, Trowell, Cossall and Awsworth. Nottinghamshire County Council's consultation on the 130 ha mine finished at the end of June 2012. The proposed mine has been described in local press reports as a 'rape' of the countryside, treasured by many as DH Lawrence land, after the author's local connections. UK Coal plans to extract 1.275m tonnes of coal over five years and employ 60 workers (Ilkeston Advertiser, 11 July 2012).

East of England: Cambridge

Cambridge: consultation on up to 12,350 new dwellings. The City Council is currently consulting on options for its Local Plan Review, which include large scale releases of Green Belt within the City's area. In addition to this there are likely to be significant releases of Green Belt land to accommodate an as yet unspecified number of further dwellings in neighbouring South Cambridgeshire.

London (Metropolitan) Green Belt

<p>Bedfordshire: further consultation on 2,500 new dwellings at Leighton Buzzard and a 52 hectare freight interchange. A consultation concluded in August on the Central Bedfordshire Core Strategy, with a final draft to be published for examination by the end of 2012. The Core Strategy proposes an urban extension of 2,500 dwellings on Green Belt land at Leighton Buzzard, which CPRE Bedfordshire will be particularly harmful to the character of the town and the surrounding countryside. In addition, a 52 ha freight terminal is proposed at Sundon, north of Luton. CPRE Bedfordshire and others are concerned that, despite being marketed as a 'railfreight interchange', the development will in fact be more of a road logistics depot.</p>

<p>Hertfordshire: Ministerial decision awaited on St Albans interchange. Plans for the strategic railfreight interchange on land at Radlett have been rejected by both the planning authority and the Secretary of State (in July 2010) on Green Belt grounds. CPRE Hertfordshire and others are concerned that, despite being marketed as a 'railfreight interchange', the development will in fact be more of a road logistics depot drawing lorries to and from the nearby M1 motorway. The developer Helioslough has submitted a fresh application. Eric Pickles has not yet reached a decision on this proposal.</p>
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<p>Surrey: (i) planning permission granted for a hotel and golf course at Cherkley Court near Leatherhead. This scheme is a departure from plan policies, and would seriously affect the landscape quality of the Green Belt and the Surrey Hills Area of Outstanding Natural Beauty. The application was narrowly passed by Mole Valley District Council against officers' advice. Eric Pickles has decided not to call the application in for his decision.</p>
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<p>(ii) Local Plan inspectors call for Green Belt alterations. Inspectors examining draft local plans have called for Reigate and Banstead Borough Council and Woking Borough Council to bring forward reviews of the Green Belt in order to accommodate, respectively, up to 2,180 and 550 new dwellings (August 2012).</p>

<p>Thames Gateway - Thurrock: 665 dwellings granted planning permission. In a Parliamentary answer dated 25 June 2012, Ministers stated that they had 'ended the top down central management of the Thames Gateway' area to the east of London. Since 2010, however, Ministers have given permission for dwellings at two separate sites in the Green Belt in the former Gateway area, at East Tilbury and Stanford le Hope.</p>

<p>The route of the proposed High Speed 2 (HS2) rail link from London to Birmingham and the North of England is likely to pass through Green Belt land around the Colne Valley Regional Park to the west of Ruislip. Later phases of HS2 will also involve new development in the Green Belt to link the line to Heathrow Airport (see also under 'West Midlands' below).</p>
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North East
Durham: further consultation on plans to build 3,550 new dwellings and 27 hectares of business park-related development. In summer 2011 Durham County Council consulted on initial plans and it is expected that development proposals on Green Belt land around Durham City will continue to feature in the Council's 'preferred options' consultation, due in autumn 2012.
Newcastle-Gateshead: consultation on plans for 3,000 houses and a link road. The draft Joint Core Strategy (1Plan) contains proposals for building on Green Belt land and is currently under consultation. The earlier consultation, in November 2011, proposed significant Green Belt loss with some 6,500 houses (out of a total of 36,000 houses to 2030) proposed to be built on the Green Belt over 15 years. This led to massive local objections - including many associated with the threat to a popular nature reserve in Gosforth.

North West
Chester and Halton: consultation on the development of 5,870 new dwellings. In September 2012 Cheshire West and Chester Council is expected to begin consultation on Green Belt alterations to accommodate 2,000 new dwellings, following an initial assessment in 2011. The Council has not shown that it has properly assessed the amount of brownfield land available elsewhere in its area, which also includes Ellesmere Port, Winsford and Northwich. The Council and its predecessor authorities have looked to promote a number of large park and ride and other developments in the Green Belt in recent years. Neighbouring Halton Council is also set to consult on reviewing the Green Belt around Widnes and Hale. According to local press reports, this is in order to accommodate up to 3,870 new dwellings, with many of the brownfield sites available for development being passed over due to concerns about the sites being unviable due to contamination. The review follows a 'main modification' made by the planning inspector who examined the draft Halton Core Strategy in late 2011.
Fylde: New road at Queensway, Lytham St Annes granted planning permission by the Secretary of State. The road, granted permission in June 2012, will link to 1,150 new dwellings to be built on greenfield land outside the Green Belt. A key factor in persuading the Secretary of State was the pledge that the developer would also fund another road through the Green Belt (the M55 Link) at a later date. An earlier decision to dismiss the appeal, in June 2010, was quashed by the High Court in December of that year.
Heysham: New link road under consideration. In November 2011 Lancashire County Council applied to the Secretary of State for permission to build a 4.8 km dual carriageway and 600 space park and ride site, most of which will involve building in the North Lancashire Green Belt. The project is under examination by the Planning Inspectorate until October 2012, and will be decided by the Secretary of State in 2013.
Manchester: Airport enterprise zone designated and business calls for wholesale relaxation of policy. In March 2011, Manchester Airport was confirmed as the location of one of the UK Government's Enterprise Zones. In such zones local authorities can allow new business and industrial development by order without the need for the developer to apply for planning permission. The initial areas covered by the zone included areas removed from the Green Belt for that purpose through the Local Plan process, and there are concerns that further development at and around the airport will spill out into remaining Green Belt land. Following

the designation of the zone, the Manchester Economic Advisory Panel has issued a report calling for a wholesale relaxation of Green Belt policy in the region.

Sefton and West Lancashire: consultation expected on Green Belt releases to accommodate housing and employment development. Both councils consulted in 2011 on releasing significant amounts of Green Belt land for an unspecified amount of development. It is now understood that Sefton's preferred options, due for consultation in autumn, are likely to include releasing Green Belt land to accommodate between 3,960 and 6,600 houses, plus 25ha of employment land. West Lancashire will propose to release 135 hectares of Green Belt land to accommodate 750 houses, 10 ha employment land, 10 ha for university expansion, and further 'safeguarded land' for development use after the plan period, or in case other housing sites are not delivered.

St Helens: proposal for 762 ha freight terminal. The draft Core Strategy proposes development on Green Belt land at Parkside.

Wigan: consultation on development of at least 2,500 new dwellings. Consultation will take place until 11 September 2012 on releasing a number of sites from the Green Belt around Leigh. In July 2012 the inspector examining Wigan Council's draft Core Strategy called for further land to be identified to meet the NPPF requirement for 20% additional land to meeting housing supply requirements.

South and West Yorkshire

Barnsley: consultation on proposals for 1,200 dwellings and 500 hectares of warehousing. Barnsley Metropolitan Borough Council proposes 1,200 new large 'executive' dwellings, and at least some of these will be delivered through the use of Green Belt. The recently adopted Core Strategy, by contrast, only allowed Green Belt land to be released for employment allocations. In addition Barnsley have significantly increased the amount of Green Belt land for employment. 360 hectares up to 500 hectares, spread across a number of sites, in particular Goldthorpe in the Dearne Valley. The proposals (the Sites and Places development plan document) are under consultation until 28 September 2012.

Bradford: plans for 1,800 dwellings on Green Belt land near Holme Wood approved by the council. This is in the form of a new self-styled 'neighbourhood development plan' agreed in January 2012.

Doncaster: new road approved by the council. The scheme, titled the Finningley and Rossington Regeneration Route Scheme (FARRRS), was approved in June 2012. It covers 89 ha of countryside, most of it in the Green Belt. It is intended to help bring about further new housing and business park development in the area surrounding the road.

Kirklees: plans for 1,500 dwellings on Green Belt land around Dewsbury to be examined by the Planning Inspectorate. In March 2012 Kirklees Council approved a new Local Plan for examination. The examination will begin in September.

Leeds: consultation completed on proposals for 19,400 new dwellings. Leeds Council consulted on a new Core Strategy from February to April 2012. This proposes that should go on greenfield extensions to the urban area; most if not all of the land affected will be in the Green Belt. The final document is expected to be adopted as policy in 2013.

Wakefield: plans for a stadium and warehousing given provisional approval. In June 2012 the Secretary of State stated that he was 'minded to approve' an application for a community stadium and warehousing on 86 ha of Green Belt land separating Wakefield from Leeds. Despite the Secretary of State making approval conditional on a planning agreement regarding the delivery of the stadium, there are widespread concerns locally that the warehousing (which would involve 50 ha of Green Belt land) will be developed without the stadium.

South West
Avonmouth - Bridgwater: consultation on new pylons. In 2010 National Grid announced plans for a new line of 50m high pylons running through 44km of the North Somerset countryside, and since that time the company has carried out a series of public consultations on the detailed route of the line. A final decision on the route is expected at the end of the year, with a full application for development consent to be submitted in 2013. Whichever route is chosen from the options canvassed thus far would have a direct impact on Green Belt land south of Portishead and north of Nailsea.
Bath: Park and ride expansion, and a planning inspector pressures the local authority to reinstate plans for up to 4,500 new dwellings. An urban extension on Green Belt land was originally proposed in the South West RSS. A note from the Planning Inspectorate, dated 21 June 2012, questions whether the proposed figure of 11,000 new dwellings is sufficient and states: 'it is possible that some development in the Green Belt may need to be contemplated'. If the regional strategy target of 15,500 is restored, this would imply up to 4,500 new dwellings in the Green Belt. 1,120 new spaces for park and ride schemes will be constructed on Green Belt land at Lansdown, Newbridge and Odd Down, as part of the Bath Transportation Package approved by the Government in July 2012.
Bristol (north) and South Gloucestershire: plans for 3,000 dwellings have been examined by the Planning Inspectorate. The South Gloucestershire Core Strategy, which was examined during June and July 2012, proposes to remove two areas from the Green Belt immediately north of Bristol to create two urban extensions near Cribbs Causeway (1,000 dwellings) and Harry Stoke (2,000 dwellings). Nearby, a development of 1,500 park and ride spaces is proposed close to the M32 motorway on high quality agricultural land. An initial consultation on elements of the scheme closed in July.
South West Bristol: Planning application for a new link road to be submitted in the autumn. The new road would cut a swathe through Green Belt land to the south of Bristol at Ashton Vale, close to where controversial plans for an urban extension in the South West RSS have been scrapped. The road could be a Trojan Horse for a future revival of the RSS urban extension plans. The planning application is expected later in 2012.
Christchurch and East Dorset: plans for 3,000 dwellings to be examined by the Planning Inspectorate. The Pre Submission Local Plan Core Strategy, which underwent public consultation from April to June 2012, proposes over 3,000 homes in the Green Belt. Justification is based on work conducted for the update of the former RSS. The drive for Green Belt development seems to be based on fears about future land supply and the short term viability of regeneration schemes.

West Midlands

Birmingham: proposals for 3,000 dwellings near Bromsgrove and major development around Birmingham Airport. CPRE understands that plans for a 'Birmingham Enterprise Belt' are being promoted by the Greater Birmingham Local Enterprise Partnership (LEP), under its 'City Deal', and could lead to significant releases of Green Belt land to accommodate new development around the city. This would include (i) a major new High Speed Rail interchange station near Birmingham airport, (ii) the expansion of Birmingham airport and flying activity from it and (iii) new warehouse development and (iv) major new housing development, including 3,000 new dwellings to the south of the city overlapping into Bromsgrove District. Public consultation on detailed proposals is expected in the coming months. CPRE is particularly concerned that the new Birmingham Council administration has said it is more sympathetic to Green Belt release even though plenty of brownfield land remains available within the city for new housing and industry. The route of the proposed High Speed 2 (HS2) rail link from London to Birmingham and the North of England passes through a swathe of Green Belt land in the West Midlands.

Coventry: planning application expected for business parks and warehousing near Coventry airport. The City Council continues to resist Green Belt housing development but Coventry Council and the Coventry and Warwickshire LEP is supporting the so-called 'Coventry Gateway Project' which would include large amounts of new Industrial Development north and south of Coventry Airport in Green Belt including a significant amount of warehousing. An environmental assessment scoping study has been undertaken and a planning application is expected later this year.

Warwick: proposals for 2,000 new dwellings. The Local Plan 'Preferred Options' (May 2012) proposed 2,000 dwellings in total on current Green Belt land, comprising sites in Blackdown and Milverton, as well as in or around a number of villages, such as Hampton Magna and Lapworth. The consultation closed at the beginning of August but there will be a further round of consultation on a final version of the Local Plan, expected at the end of 2012.

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CPRE, August 2012