

Improvements to the NPPF to protect the Green Belt and particularly the Green Belt in the Colne Valley on the edge of London



A Paper produced by the Colne Valley Regional Park - November 2021

Overview of the Issue

- Our evidence comes from the Colne Valley Regional Park (CVRP), straddling nine Local Authority areas. This is a critical and significant part of the London Green Belt, but our experience and suggestions are also relevant to other areas of Green Belt (GB).
- The scale of development demand in and around London is overheating the South East, and our evidence is that the Green Belt on the edge of the capital needs to function much better as a resource for countryside access and environmental improvement.
- Whilst the CVRP works tirelessly (as do others) to improve the quality and functioning of the Green Belt, this is continually frustrated by relentless development proposals and widespread planning enforcement problems arising from inappropriate urban activities.
- There is extensive developer land-banking and insufficient incentive to do the right thing: to keep land green, in good condition and available to fulfill its environmental potential.
- The current system leads to individual large-scale developments being treated as ‘one-off’ schemes (through ad hoc planning applications) and development plan allocations being considered within the narrow context of individual Local Authority areas. The cumulative effect of this has become a significant problem and its impact on the Green Belt across the CVRP now needs to be recognised, and urgently assessed at a strategic level.
- Government policy to prioritise development on brownfield sites and protect the Green Belt is not working. It appears that development interests now see the CVRP as ‘available’ land.

National policy (NPPF) for the Green Belt needs strengthening to send a clearer message to the development industry and Councils about the permanence of the Green Belt. And that strengthened policy will need to be underpinned with tighter management, control and incentives if it is to be in any way effective.

Evidence and lessons from the Colne Valley Regional Park Case Study

- Included at Annex 1 and 2 to this paper are some plans and images:
 - a) To illustrate the extent of the Colne Valley Regional Park (CVRP) and the organisation that was created in 1965 (without government or other funding stream) to protect and improve a large part of the London Green Belt.
 - b) To convey the huge development pressures it continues to face – pressures that incrementally and cumulatively erode the permanence and successful functioning of the Green Belt.
- We see that the ‘inner’ part of the London GB is the most threatened and fragmented – but it is also the most valuable from a policy perspective, with the greatest role to play in terms of providing wider biodiversity, benefitting the environment locally and generally, ameliorating the effects of climate change, and boosting the health and wellbeing of the public.
- The issues affecting the Colne Valley are explored in more depth in a September 2021 document *The Colne Valley Regional Park - Fighting for its life*, which can be found here: <https://www.colnevalleypark.org.uk/the-colne-valley-regional-park-is-fighting-for-its-life/>

Aspects of NPPF policy to address and change with some suggestions

Aspect ¹ of NPPF GB policy to address	Some specific suggestions for NPPF
<p>A Sixth purpose for the Green Belt Whilst the five ‘purposes’ (138) remain relevant it is time to add a sixth – relating to the GB providing a natural environment resource for countryside recreation, enhanced biodiversity, local food production and to combat climate change – all accessible to large urban areas. This underpinned what the Green Belt was originally conceived for and is now more important than ever.</p>	<p>Craft a new purpose drawing on our wording in the left hand column. Add a supporting guidance document – a 66-page National Design Guide has been published – if protecting and improving the GB is a government priority, why is there no equivalent guidance document? This suggestion relates to all points made below and should be supported by training for officers and councillors.</p>
<p>Permanence – a Disconnect between the NPPF’s (137) stated “fundamental aim of Green Belt Policy ...to prevent urban sprawl by keeping land permanently open...” and practice on the edge of urban areas. See case Study in the Annex.</p>	<p>Add interpretive text to emphasise that incremental loss of significant areas of GB land to development is not acceptable. Discourage frequent reviews of GB boundaries. Encourage strategic GB planning across Councils.</p>
<p>The Positive role of the GB (145) and action by local planning authorities needs more prominence, with stronger advice and guidance on how Local Authorities (across all functions) should deliver this, including decisions on planning applications. The NPPF should flag that the GB is a finite green resource with a critical role to promote physical and mental health/well-being</p>	<p>This is linked to the introduction of a ‘Sixth Purpose’. The NPPF should introduce clear and strong links between the improvement of the ‘inner’ GB as accessible countryside and Local Nature Recovery Strategies. There should be text around this positive role applying across LA functions, so it is reflected in a corporate effort.</p>
<p>The ‘Very Special Circumstances’ (‘VSC’) (147 onwards) are open to wide interpretation and often repeated use in support of development proposed in planning applications. It should be made clear that the ‘need’ for development and inability of an applicant to identify suitable land ‘locally’ to meet that need is a circumstance that should only be addressed in Development Plan preparation.</p>	<p>Make clear that arguments based on unmet development needs are not “very special” and such circumstances/arguments must be considered through cross-border planning, with reference to Local Plans and government strategies. Find other ways (than the threat and reality of losing appeals) to encourage LPAs to have an up-to-date Local Plan in place.</p>
<p>Exceptional Circumstances (‘EC’) (140/ 141) – like ‘VSC’ this is open to wide interpretation and LPAs feel under pressure to meet development ‘needs’ in their areas – and that this can represent ‘EC’, even if the land in question functions well as GB.</p>	<p>Add NPPF wording to clarify that LPAs are not required to meet all development needs (if the consequence is losing functional GB) and can give priority to protection and improvement of their GB.</p>
<p>Compensatory Improvements (142) – this is a very important point about improving the remaining GB when development does occur, but the provision as worded can be interpreted as relating only to Plan preparation. It needs to apply more widely.</p>	<p>See suggested wording in Annex 3 to strengthen and broaden the application of this provision. Guidance is also needed on good practice examples as it is too often given insufficient or no attention by developers and LAs.</p>
<p>Cross Border and Strategic Planning (141c) – Whilst this is called for in the NPPF, existing mechanisms, particularly the “Duty to Co-operate’ fail to achieve good strategic planning at a cross-border, regional and national level.</p>	<p>An approach is needed by government and groupings of LAs to direct development demand and need to areas outside the South-East as part of the levelling-up agenda and to spread the benefits of economic growth.</p>

¹ The relevant paragraph in the July 2021 NPPF is *in italics in brackets*)

Fit with other government policy priorities

We commend this approach and revisions to the NPPF to better protect and improve the Green Belt. We see that they are consistent with other government initiatives, including:

- People's Health and Wellbeing
 - Facilitating the Mental Health benefits from interaction with the natural environment and countryside
 - Addressing obesity and promoting better physical health from outdoor active lifestyles
- The recent initiative *A Green Future: Our 25 Year Plan to Improve the Environment*
- Levelling Up – spreading the benefits of economic growth
- The reassessment of how housing needs/ targets should be determined
- Local Nature Recovery Strategies
- Biodiversity Net Gain
- Sustainable transport – enabling the countryside on the doorstep of large urban areas to be easily accessible by foot, cycling and public transport
and, not least,
- Addressing Climate Change

Conclusion and Next Steps

The Rt Hon Christopher Pincher MP, Minister of State at the Department for Levelling Up, Housing and Communities, had acknowledged the value of considering the Colne Valley Regional Park as a case study related to the review of national planning policy after the Planning White Paper. He had agreed to visit the Park in the early summer of 2021 to discuss the issues and see the area for himself.

Unfortunately the Minister postponed this visit and a new date needs to be arranged.

The CVRP occupies a strategic position on the edge of London and the Park is charged with maintaining and enhancing its area. We believe important lessons can be learnt from the good work the Park does, the huge challenges it faces, and how this relates to the implementation of NPPF Green Belt policy. It merits particular consideration.

The CVRP therefore:

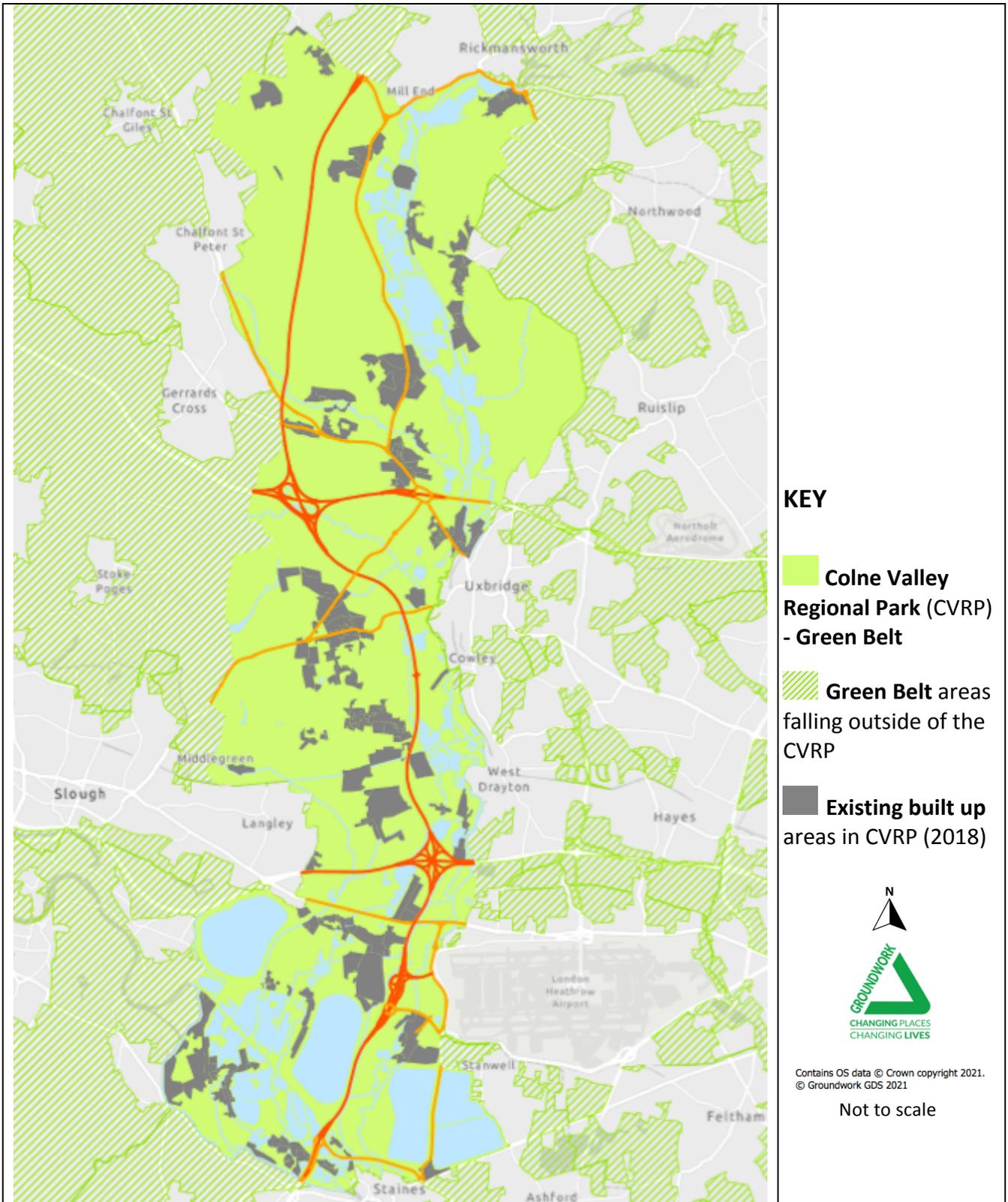
- Requests an urgent discussion with Government around the issues raised in this note
- Welcomes involvement in, and collaboration with, other organisations concerned with the same issues e.g. the RTPI and the CPRE
- Asks for consideration by the Government of the suggestions in this note before changes are proposed to the NPPF (which we understand may be imminent) so that policy and practice for the Green Belt is improved and strengthened.

We look forward to hearing from you in due course.

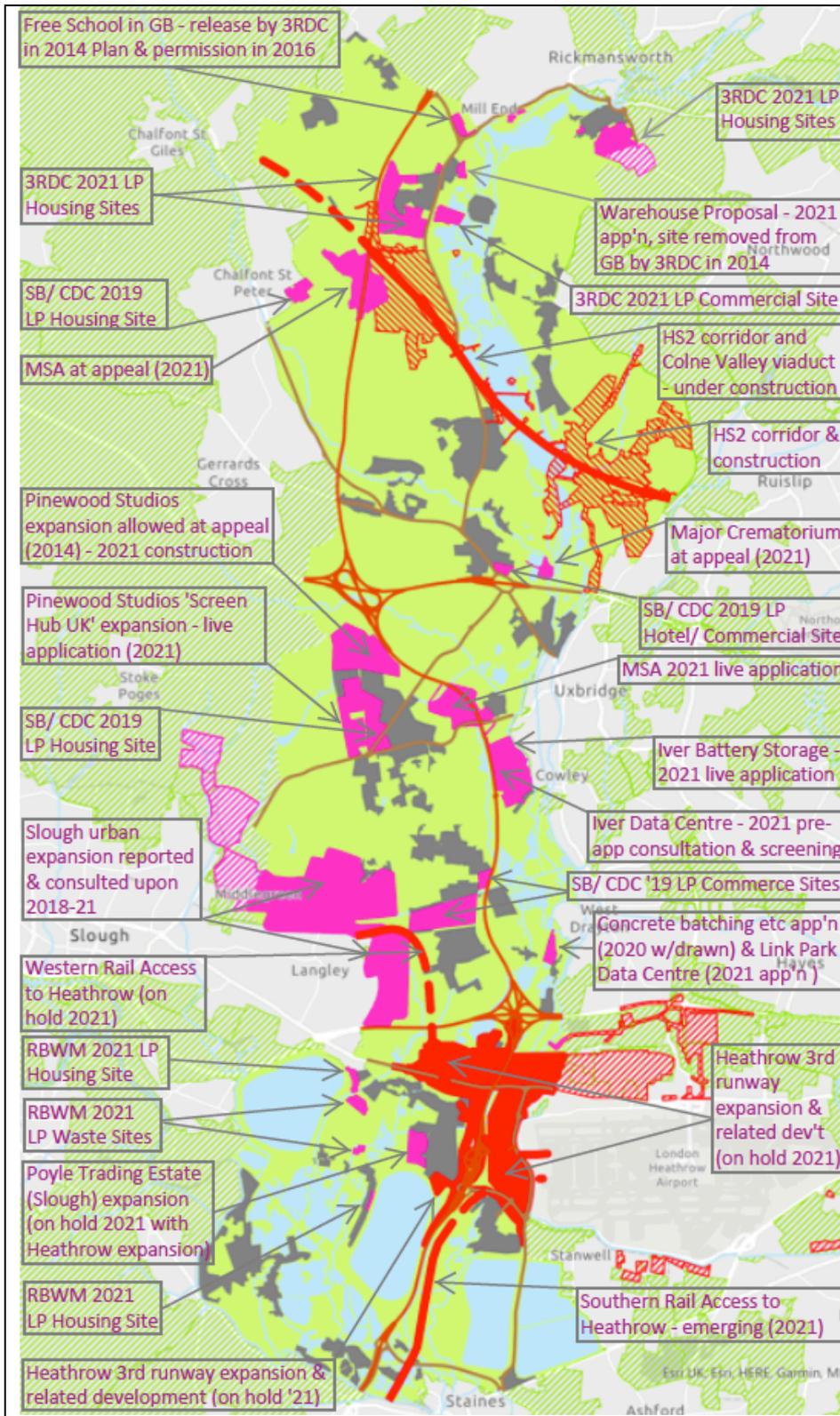
The Colne Valley Regional Park

Please contact SPomeroy@groundwork.org.uk with any queries.

MAP 1 Colne Valley Regional Park – the ‘existing’ situation (as in 2018)



MAP 2 – Colne Valley Regional Park – Is this the Future?



KEY

Note: This mapping only captures major developments

Major Development proposed within the Green Belt in the CVRP

Parts of those major developments continuing outside CVRP

Major Infrastructure proposals (HS2, Heathrow Expansion & rail schemes)

Parts of those major proposals outside CVRP

HS2 construction sites ('temporary' up to 15 years)

Abbreviations

CVRP – Colne Valley Regional Park
 SB/ CDC – Former South Bucks & Chiltern District Councils
 3RDC – Three Rivers District Council
 RBWM – Royal Borough of Windsor & Maidenhead
 MSA – Motorway Service Area
 LP – Local Plan



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Not to scale

Colne Valley Regional Park



43 square miles
 >3M people within 10 miles
 70 lakes + 200km rivers/canals
 100's of green spaces, 5 country parks, 20 Nature Reserves, 13 SSSI's
 270km of public rights of way

CVRP - key to fulfilling the positive aspects of Green Belt policy

Key to physical and mental health, biodiversity & farming

Most pressured part of the (inner) Green Belt



CVRP Founded 1965



CVRP's 6 Objectives summarised

- maintain and enhance
- safeguard from **inappropriate development**
- conserve and **enhance biodiversity**
- countryside **recreation accessible to all**
- vibrant and **sustainable rural economy**
- **community participation, promoting health and well-being benefits from access to high quality green space**

Critical part of the 'inner' Metropolitan Green Belt

Across many LAs

Suggested revised text (added text in red) for Para 142 in NPPF

142. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making 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 (whether by boundary review or land allocation) or when major development within the Green Belt is to be allowed under very special circumstances, plans and decisions 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, commensurate with the scale of development proposed and its context within the Green Belt.