

4. POLICY CONTEXT

INTRODUCTION

- 4.1. This section sets out the policy context for land in the Study Area. It starts with a discussion of Green Belt policy, and goes on to look at policy for the countryside, biodiversity and nature conservation, and finally the open space policy context.

GREEN BELTS

- 4.2. Green Belt is the most well known and widely supported planning policy in the UK. It is also recognised internationally as a successful means of containing the spread of cities and towns. Covering around 5,000 km², London's Green Belt represents about one third of Green Belt land in England – an area equivalent to that of Hertfordshire and Essex combined, or one quarter of Wales.
- 4.3. Current policy on Green Belts is set out in PPG2 *Green Belts*, which outlines the principal purposes of Green Belts as follows:
- To check the unrestricted sprawl of large built-up areas
 - To prevent neighbouring towns from merging into one another
 - To assist in safeguarding the countryside from encroachment
 - To preserve the setting and special character of historic towns
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.4. The Mayor's London Plan endorses these purposes for the London Green Belt.
- 4.5. However, the draft Regional Planning Guidance for the East of England indicates that the key dilemma for the strategy is the protection of Green Belt areas versus the need to allow sustainable development in key London fringe towns and to redress unsustainable commuting patterns by creating a closer relationship between homes and jobs. The strategy proposes selective Green Belt reviews around key towns, primarily those with regeneration needs and/or offering the greatest potential for sustainable development, based on public transport and management of travel demand.
- 4.6. In addition to the formal purposes of Green Belts, PPG 2 indicates that land designated as Green Belt also has a role to play in meeting a number of positive objectives, although its ability to perform them is not itself material to the inclusion of land in the Green Belt.
- 4.7. These positive objectives are:
- Providing opportunities for access to the open countryside for the urban population

- Providing opportunities for outdoor sport and outdoor recreation near urban areas
- Retaining attractive landscapes, and enhancing landscapes, near to where people live
- Improving damaged and derelict land around towns
- Securing nature conservation interest
- Retaining land in agricultural, forestry and related use.

Origins of Green Belts

- 4.8. The principle of maintaining a ring of open country around London can be traced back to the 16th century. The prevention of the spread of the plague was a key reason, and it was also valued as a source of food for the metropolis.
- 4.9. Ebenezer Howard, the pioneer of British planning envisaged a *'rural belt around a town as providing an attractive setting in which a town could develop and which would maintain, close at hand, the fresh delights of the countryside – field, hedgerow and woodland'*¹⁹.
- 4.10. The Greater London Regional Planning Committee adopted a policy to establish the London Green Belt, the first in the country, in 1935. In the absence of planning controls, it was necessary to purchase land to ensure its protection²⁰.
- 4.11. The 1943 County of London Plan, produced by Forshaw and Abercrombie, established two main objectives for the Green Belt: restriction of urban growth; and provision of recreation as a primary use of the land. Beyond the Green Belt, they proposed an 'Outer Country Ring'. This distinction between the Green Belt and the countryside beyond implied a more managed approach to the Green Belt for the benefit of Londoners.
- 4.12. The first official guidance on the establishment of Green Belts (Circular 42/55 *Green Belts*), however, failed to recognise the amenity and public health functions of Green Belts and the opportunities they could provide for informal recreation.
- 4.13. In the London context, this was addressed in part by the 1976 Greater London Development Plan, which stated that in addition to defining the built up area, the Green Belt provides *'an area where recreational activities can take place. At the same time it plays an important role in the retention of attractive landscapes on London's fringes'*.
- 4.14. Guidance on Green Belts published by the Department of the Environment in 1988 added *'safeguarding the surrounding countryside from further encroachment to'* Green Belt purposes. This was the first reference to a rural objective for Green Belts, the previous objectives being oriented towards the urban area. Subsequently PPG 2 referred to Green Belts amongst policies with *'conservation and enhancement as their common flavour'*. As noted above, PPG 2 also emphasises the positive environmental role that Green Belts can play, as well as serving their main purposes.

¹⁹ *Tomorrow: a Peaceful Path to Real Reform* Ebenezer Howard, 1898

²⁰ The London and Home Counties (Green Belt) Act, 1938, provided the legal mechanism for land purchase

Green Belts and Sustainable Development

- 4.15. Most commentators agree that the Green Belt has been successful in achieving its main purpose: to control the spread of London and avoid coalescence with neighbouring towns. There is some concern in some quarters, however, about the principle of Green Belts in the context of sustainable development. Such concerns relate to the implications of continued restriction on development in Green Belts, in terms of amongst other things, increased land costs, diversion of development into deeper countryside, increases in travel and CO² emissions, and an inability to allow growth where needed²¹.
- 4.16. Although a longstanding supporter of Green Belts, the Royal Town Planning Institute (RTPI) has highlighted three reasons to justify reviewing current Green Belt policy²²:
- Green Belt Policy has failed to keep up to speed with the changing planning policy agenda in recent years;
 - The public perception of Green Belts, and their role and purpose, increasingly is removed from the realities; and
 - There are often conflicting aims in the application of green belt policy.
- 4.17. In seeking to modernise Green Belt policy the RTPI advocates the need for a universal strategic role for Green Belts, which forms an integral part of the (regional) settlement strategy with the over riding principle being an effective spatial planning tool. Emphasis should be placed on policy being stated in terms of key principles to be satisfied, moving towards a plan-led approach to development control in Green Belts.
- 4.18. The Town and Country Planning Association (TCPA), also a supporter of Green Belts, shares many of the RTPI's views with regard to the modernising of Green Belts²³.
- 4.19. A recent pamphlet produced by the think-tank Politeia suggests that it would be better to build the houses that are needed in London and the South-East where people want them, rather than in growth areas up to 70 miles from London. It asks *'is it really sensible that every field close to London, even if it is bordered by Tube tracks or motorways, should be sacrosanct, when further out farmland is being covered with housing for commuters, many of whom will travel back into the city?'*
- 4.20. The Campaign to Protect Rural England (CPRE), on the other hand, argues that we need more and stronger Green Belts. It suggests that, with the twin commitments of protecting the countryside and promoting an urban renaissance now shared across the political spectrum Green Belts should be coming of age, not defending their corner²⁴.

²¹ *The Effectiveness of Green Belts*, Department of the Environment, 1993

²² *Modernising Green Belts-a discussion paper* Royal Town Planning Institute, 2002

²³ *Green Belts – TCPA Position Statement* Town and Country Planning Association, 2002

²⁴ *Green Belts ... still working ... still under threat*, CPRE, 2001

- 4.21. The Government has yet to respond formally to the pressures to change Green Belt policy. It is anticipated, however, that PPG 2 will be revised as a PPS as part of the overall review of PPGs.

COUNTRYSIDE AROUND TOWNS

- 4.22. Planning Policy Guidance 7 *The Countryside – Environmental Quality and Economic and Social Development* indicates that the urban fringe requires a 'positive approach to planning and management, aimed at securing environmental improvement and beneficial use of land, reducing conflicts between neighbouring land uses, improving public access, and catering for appropriate leisure and recreation facilities so as to reduce pressure on the wider countryside and reduce the need to travel' (para 3.24).
- 4.23. Similar guidance is provided in draft PPS7 Sustainable Development in Rural Areas, which will replace PPG7. It also adds that planning authorities should support country parks and community forests and facilitate the provision of sport and recreation facilities.
- 4.24. The current draft of RPG 14 indicates that Planning authorities and other agencies in their plans, policies and programmes should seek to, amongst other things:
- Conserve and enhance the natural, historic and built environment by positive management and protect it from development likely to cause harm
 - Adopt an approach that integrates protection and enhancement of nationally and internationally designated areas while meeting the social and economic needs of local communities
 - Protect, for their own sake, all important aspects of the countryside, including individual features, special sites and the wider landscape
 - Conserve and enhance, whenever possible, regional and local distinctiveness and variety, based on a thorough assessment of local character, scrutinised in depth through the development plan system
 - Promote a sustainable approach to the use of the region's natural resources
 - Secure effective protection of the environment by considering the nature and location of proposed development as part of a broadly based concern for and awareness of biodiversity and other environmental issues, including light and noise pollution
 - Restore damaged and lost environmental features whenever possible; and adopt a common approach to environmental issues which cross local planning authority boundaries.
- 4.25. Specifically with respect to the urban fringe, draft RPG 14 indicates that local authorities, developers and other agencies should work together to secure the enhancement, effective management and appropriate use of land in the urban fringe through formulating and implementing strategies for urban fringe areas, where appropriate, at sub-regional scale.

BIODIVERSITY

- 4.26. PPG 9 (Nature Conservation) sets out the Government’s objectives for nature conservation in relation to land use planning including the need to ‘ensure policies contribute to the conservation of the abundance and diversity of British wildlife and it’s habitats’. Paragraph 19 stipulates that nature conservation objectives should be taken into account “in urban areas where there is wildlife of local importance”. This stipulation is likely to apply especially to the urban fringe.
- 4.27. Policy ENV3 of the draft RPG indicates the region’s biodiversity, earth heritage and natural resources will be protected and enriched through conservation, restoration and reestablishment of key resources by, amongst other things:
- Promoting the restoration and re-establishment of habitats and species populations in accordance with the national and East of England Regional Biodiversity Targets
 - Identifying and safeguarding areas for habitat restoration and reestablishment, in particular for large-scale (greater than 200 ha) habitat restoration which bring associated social and economic benefits
 - Ensuring the appropriate management and further expansion of wildlife corridors that are important for the migration and dispersal of wildlife
 - Establishing networks of semi-natural green spaces in built up areas as part of the process of developing more sustainable, safer, secure and attractive urban and built forms; and
 - Ensuring that all new development minimises any damage to the biodiversity and earth heritage resource and, where possible, enhances it.
- 4.28. The London Plan emphasises the importance of conservation and the enhancement of the natural environment within the capital, particularly in relation to biodiversity and contains several policies in relation to biodiversity, habitat and species. The Plan states that Green Belt land should provide Londoners with a variety of benefits including protection and promotion of biodiversity (para 3.247). The Plan notes that ‘the Mayor expects the biodiversity and natural heritage of London to be conserved and enhanced for the benefit of this and future generations’ (para 3.258). The Plan recognises the potential for biodiversity and wildlife areas to provide access to natural green spaces, and notes that wherever appropriate new development should include new or enhanced habitats and promote biodiversity (para 3.260).
- 4.29. The Plan highlights the importance of linkages in the greenspace network in facilitating the movement of plant and animal species within the urban area. Policy 3D.7 says the Mayor will work with Boroughs and other partners to promote London’s network of open space and to protect their many benefits including those associated with biodiversity. London’s waterways also act as an important conduit for plants and animals and Policy 4C.3 stipulates the Mayor will, and borough should, protect and enhance the biodiversity of the Blue Ribbon Network in a number of ways, including resisting development that results in a net loss of biodiversity.

4.30. The Plan also cross-references to the Mayor’s Biodiversity Strategy, a key aspect of which is to ensure that all Londoners have ready access to wildlife and natural green spaces.

OPEN SPACE

4.31. The current draft of RPG 14 indicates that Local Development Documents should:

- Provide connected and substantial networks of accessible multi-functional green space, in urban, urban fringe and adjacent countryside areas to service the new communities in the sub-region by 2021
- Have a multiple hierarchy of provision of green infrastructure, in terms of location, function, size and levels of use, at every spatial scale and all geographic areas of the region
- Provide and safeguard green infrastructure based on the analysis of existing natural, historic, cultural and landscape assets, provided by characterisation assessments, and the identification of new assets required to deliver green infrastructure
- Identify Biodiversity Conservation Areas and Biodiversity Enhancement Areas to deliver large-scale habitat enhancement for the benefit of wildlife and people.

4.32. Sustainable development is a key strand running through the London Plan. The Plan notes that open spaces should be ‘*protected and enhanced so that growth can benefit the city’s breathing spaces*’ (p. 5 para 21). The Plan sets out how the Mayor will work with boroughs and other partners to protect and promote London’s network of open space. Policy 3D.10 sets out that UDP policies should identify broad areas of public open space deficiency and priorities for addressing them. The Plan also places emphasis on individual local authorities to develop open space strategies. The strategic efforts by the GLA (which this study will feed into) and efforts at local authority level will lead to a clear definition of where there is a deficit of open space across the capital, requirements for improvements and where opportunities lie to provide new sites.

4.33. The importance given to conservation and enhancement of the natural environment, particularly in relation to biodiversity, is also evident throughout the plan. The Plan contains several policies in relation to biodiversity, habitat and species. The Plan notes that ‘the Mayor expects the biodiversity and natural heritage of London to be conserved and enhanced for the benefit of this and future generations’. The Plan recognises the potential for biodiversity and wildlife areas to provide access to natural green spaces, and notes that wherever appropriate new development should include new or enhanced habitats and promote biodiversity.

4.34. The London Plan cross refers to the Mayor’s Biodiversity Strategy, a key aspect of which is to ensure that all Londoners have ready access to wildlife and natural green spaces.