



2024 GOVERNMENT CONSULTATION ON REVISED NPPF RESPONSE FROM COLNE VALLEY REGIONAL PARK (CVRP)

This paper sets out our overall response to the July 2024 NPPF consultation. We separately respond to specific questions asked in the consultation. These are included in an Annex.

SUMMARY OF the Colne Valley Regional Park's (CVRP's) position

- We welcome a fresh look at Green Belt policy in the NPPF and **support** much of the revised draft of the NPPF:
 - **Strategic planning** to inform decision making on Green Belt release and other significant, cross-border, planning matters
 - **Making the Green Belt work for the 21st Century** - whilst keeping its strategic role intact and with improvements to accessible green space
 - **Prioritising the release of brownfield land**
 - Using a **Plan-led system** to review Green Belts so that essential development needed by the community can be provided, with homes and infrastructure in the right (sustainable) places
- We invite the government to consider the CVRP as a case study
- We make some key suggestions for improvements to the consultation Draft
 - a) **Making the GB work for the C21st** requires more **explicit recognition** in the final NPPF **of the vital multifunctional role GB can play** as 'accessible' green infrastructure the GB can have on the edge of large urban areas.
 - b) **References to 'Grey Belt' and its definition need tightening up** to avoid unintended consequences
 - c) **Stronger guidance needed to combat incremental 'urban sprawl'** through ad hoc applications
 - d) **Stronger guidance to promote Councils' discharge of their 'positive' Green Belt role**
 - e) **Tightening up 'Exceptional Circumstances' to promote GB multi-functionality**
 - f) **'Compensatory Improvements' to apply equally to all proposed major developments – whether in plan review or in 'ad hoc' applications**

Overview of response from the Colne Valley Regional Park (CVRP)

1. Annex 1 provides basic information about, and background to, the Colne Valley Regional Park.

Why we welcome a fresh look at Green Belt policy in the NPPF

2. At the outset, we must stress we are **not an anti-development organisation, but a pro-countryside one.**

We see this is a massive opportunity for the new government to improve the planning of our Green Belts. The CVRP has much experience of development in the Green Belt on the edge of London and believes that the Green Belt's environment (and access to it) should be enhanced at every stage, when large scale building is contemplated. If the government is to embrace some building in the Green Belt, national policy can ensure it is routinely accompanied by gradual improvement of the Green Belt as a 'green' resource for society, thus realising its considerable benefit for the millions of people in our cities and urban areas.

3. We recognise the government's desire to promote productivity and growth across the country and the genuine and urgent need for affordable homes and other types of development. However, the current planning system lacks any kind of national, bigger than local, plan that balances and co-ordinates those competing needs and creates strategic spatial plans for how and where they can best be met.
4. Carefully co-ordinated management and creation of green spaces in areas like the Colne Valley Regional Park is key. Planning the future of this 'green infrastructure' requires joined-up thinking about parks, open spaces, playing fields, woodlands, trees in streets, allotments, private gardens, green roofs and walls and sustainable soil and drainage systems.
5. We commend the recent IPPR 'Delivering Natural Renewal' report: <https://www.ippr.org/media-office/think-tank-publishes-blueprint-for-restoring-uk-nature>
6. Approved developments must deliver local benefit, through better layout and design with improved environmental mitigation to directly address the impact on people's access to the countryside and Nature. Biodiversity net gain and Local Nature Recovery Strategies, whilst important, are not enough as they do not focus enough on matters such as active travel, public access and landscape quality. National planning policy can create real 'win-wins'.
7. **We support** much of the revised draft of the NPPF:
 - **Strategic planning** to inform decision making on Green Belt release and other significant, cross-border, planning matters
 - **Making the Green Belt work for the 21st Century** - whilst keeping its strategic role intact and with improvements to accessible green space
 - **Prioritising the release of brownfield land**
 - Using a **Plan-led system** to review Green Belts so that essential development needed by the community can be provided, with homes and infrastructure in the right (sustainable) places

The CVRP as a case study

8. Our experience in the last decade is that **Green Belt policy does not work.** We say this having faced:
 - Multiple major infrastructure projects and major developments each brought forward independently, not considering a cross-LA-boundary strategy for the wider area
 - A series of major developments (each more than 20 acres) in the Green Belt west of London (Uxbridge area), all justified under 'VSC'¹ and outside of any Development Plan. These schemes around Iver are illustrated in maps and diagrams in Annex 2.

¹ Very Special Circumstances - a clause in the National Planning Policy Framework
2024 GOVERNMENT CONSULTATION ON REVISED NPPF - CVRP RESPONSE

- What we observe is that **each scheme under VSC**:
 - **Escapes delivering “compensatory improvements** to the environmental quality and accessibility of remaining Green Belt land” that would be required if they were released as part of a Plan
 - Creates a **fragmented pattern of development** (in our case mostly commercial or infrastructure projects, not housing) that prevent steps we believe are needed to create strategic improvements to the environmental quality and accessibility (by active travel from urban areas) of our Green Belt
 - The **unintended consequences and cumulative impact** of these incremental (but very large) developments forcing the removal of the areas in question from the Green Belt in the Local Plans that follow on. Urban sprawl becomes a *fait accompli*.
- Two of Europe’s largest infrastructure projects – HS2 under construction and the proposed Heathrow expansion – have already had/ would have a colossal and detrimental impact on the CVRP.
- Our experience has led to our CVRP 2024 campaign which makes the case for areas like the Colne Valley to be properly planned, protected and enhanced to provide accessible high-quality countryside for the benefit of people and wildlife.
- Whilst the CVRP has many special natural resources (e.g. 13 SSSI’s) and millions of people on its doorstep, an often-overlooked strategic value is that it offers access to countryside green space. This can be part of a virtuous ‘growth’ circle: better access to green space = improved wellbeing = increased productivity = growth. In addition to this, places like the CVRP can also play a vital role in enhancing biodiversity, local food production and climate change mitigation.
- The briefing note summarising our campaign is included as Annex 3. It will be noted that point 3 (of 5) in our Action Plan is Planning Reform – which is why we are so interested in this consultation. Actions 1 and 2 are what we do on a day-to-day basis and 4 and 5 are geared to achieving what millions of people need from the CVRP.
- Articles relating to our experience of Green Belt policy can be read [here](#).

We welcome this fresh look at planning and **encourage Ministers/ civil servants to use the CVRP as a case study before finalising the NPPF**. Many valuable lessons can be learned from our experience in the last decade:

- The need for a fresh interpretation of what the Green Belt on the edge of cities can offer as a complement to meeting housing needs and urban growth and infrastructure
- The need for a strategic approach to places like the CVRP where it is the sum of the parts that need careful planning, not simply the parts themselves via NPPF footnote 7
- The importance of strengthening planning and the resources available, to ensure a planned, not simply market-led, development regime
- The care needed with the ‘Grey Belt’ concept
- The importance of effective cross-local authority area working across the Green Belt

9. Our comments on the draft NPPF focus on the Green/ Grey Belt and strategic planning.

Key suggestions for improvements to the Draft to close some significant loopholes:

10. **Making the GB work for the C21st requires more explicit recognition in the final NPPF of the vital multifunctional role GB can play** as ‘accessible’ green infrastructure on the edge of large urban areas.

- This points to the need for **either a sixth GB purpose** (in addition to the five retained from the old NPPF) **or much more explicit highlighting of the green infrastructure/ accessible countryside role** the GB can have on the edge of cities.
- This explicit referencing will help support a better quality of life within those urban areas the Green Belt surrounds and should be seen as an essential complement to the growth.
- The NPPF should specifically clarify the positive ‘well-being’ role the Green Belt should play (especially when close to urban areas) to promote wider social and environmental objectives. **It is about seeing the potential of the Green Belt for public benefit, not only what exists now.**
- The new NPPF should demand that major development in the GB takes account of important design considerations (including via design codes and design guides) to lead to the better functioning and positive improvement of the wider Green Belt.
- If approved, major development in the Green Belt it should deliver a win-win, not only on affordable housing but also with improved access (by active travel) and management of the countryside to better serve urban communities nearby.
- Strategic connectivity is crucial and the new NPPF must avoid piecemeal development that fails to enhance the wider area.
- A sixth purpose would be consistent with the five ‘benefit principles’ behind Natural England’s GI Framework. This would bring GB policy up to date with the challenges facing today’s society and environment.

11. References to ‘Grey Belt’ and its definition need tightening up to avoid unintended consequences

- We do not consider that there are widespread, identifiable, ‘grey belt zones’. A better term should be found. We recognise ‘grey’ pockets of land that may be suitable for development but, from our extensive experience, we see unintended consequences ahead:
- Landowners and developers will see an opportunity to degrade their land and make it ‘grey’ to enhance their chances of development. We have seen this repeatedly in recent years, often with breaches of planning control going unchallenged because councils have insufficient enforcement resources available. We describe this as ‘planning by dereliction’.
- The GB was introduced as a strategic policy; it should not be fragmented by taking ‘grey’ bits out without there being a proper review of the potential that land may have to provide connectivity corridors for people (active travel amongst nature) and/or for biodiversity.
- Use of the term ‘grey belt’ is confusing – implying land may be designated in this way. If land has a legitimate history of being ‘grey’ then that should be a factor (along with many others) informing decisions on how development needs should be met during Plan-making. Also, assessments of the extent to which land meets Green Belt purposes requires a strategic review and should be a matter for plan-making.
- Our experience across the Colne Valley – a large area of GB – reveals significant parts are not now ‘grey’ but are nevertheless seen by the development industry as ripe for building.
- There needs to be careful, precise, definition of what ‘grey belt’ is. That clarification will prevent speculators taking advantage of the situation and guide local planning authorities on how to prioritise it when preparing Plans. For example, it is essential that policy requires **prior checks to determine that ‘grey’ land has lawfully gained the status of being ‘previously developed land’.** **There are some unscrupulous people out there!**

12. Stronger guidance needed to combat incremental ‘urban sprawl’ through ad hoc applications

- Under the existing NPPF we have seen many decisions about the future of the GB made via large *ad hoc* applications, under ‘Very Special Circumstances’ (VSC). Assessment of these invariably focus on the site’s performance against the five GB purposes, and this is simply too narrow. The new NPPF must broaden the approach.
- NPPF wording must be tightened to avert the unplanned cumulative impact of ‘VSC’ development on the Green Belt, undermining the positive multi-functional role that it could play in relation to the urban area it relates to.
- The introduction of strategic planning can greatly assist in this endeavour.

13. Stronger guidance to promote Councils’ discharge of their ‘positive’ Green Belt role

- The call for local planning authorities to plan positively to enhance Green Belt’s beneficial use, set out in proposed Para 147, should be promoted more. This could be via supporting guidance drawing on best practice and emphasising the coordination of this aspect of planning with Local Nature Recovery Strategies.
- Whilst this paragraph has been a feature of the NPPF for some time now, it is significant that it is virtually impossible to find examples of LPAs planning to enhance a GB’s beneficial use.
- In our experience this aspect of proactive planning is especially important if communities are to see the greatest benefit from the ‘inner’ GB on the edge of a city, often with multiple LPAs. An improvement vision for this ‘first taste of countryside’ for city dwellers and workers has value for the long term.

14. Tightening up ‘Exceptional Circumstances’ to promote the multi-functionality of the GB

- The NPPF and related Planning Practice Guidance around ‘exceptional circumstances’ should require consideration of the promotion of the improvement of the GB’s multi-functionality.
- This can build on our suggestions set out in this response.

15. ‘Compensatory Improvements’ to apply equally to all proposed major developments – whether in plan review or in ‘ad hoc’ applications

- Large *ad-hoc* developments can go through under VSC. It is wrong for such proposals to by-pass consideration of compensatory improvements. NPPF policy needs to be refined to address this.
- When big developments go through under ‘VSC’, this invariably leads to the land being excluded from the Green Belt in the subsequent Local Plan. The damage has been done, and wider ‘compensatory improvements’ fail to materialise.

Note: We separately answer those consultation questions most relevant to our area of interest linking, as appropriate, to our key suggestions above.

ANNEX 1 (Basic information about the Colne Valley Regional Park)

About the Colne Valley Regional Park

The Colne Valley Regional Park (CVRP) is the first substantial taste of countryside to the west of London. The Park, founded in 1965, stretches from Rickmansworth in the north to Staines and the Thames in the south, and from Uxbridge and Heathrow in the east, to Slough and Chalfont St Peter in the west.

The CVRP occupies a strategically important part of London's Green Belt and we have significant experience of how Green Belt policy has worked (or not) over recent decades.



As the first Green Belt area west of London the CVRP offers those living in urban areas access to the natural environment, with all its attendant benefits for health and well-being. Its multi-functional roles support:

- green and blue corridors rich in biodiversity and ecological connectivity
- opportunities for nature recovery and re-wilding
- local food production
- combatting climate change
- active lifestyles, physical and mental well-being
- recreational pursuits
- flood management

We believe the CVRP is unique in having an organisation established specifically to protect and improve this area of 'inner' Green Belt on the edge of the capital, working in collaboration with local authorities and other partners. Funding is, however, minimal.

The Colne Valley Park Trust oversees the park and is a registered charity. Day-to-day operations are managed and implemented through a contract with Groundwork South, a not-for-profit company operating in the environmental sector.

Everything we do in the park is guided by its six objectives. These are consistent with national planning policy for the Green Belt:

1. **Landscape:** To maintain and enhance the landscape, historic environment and waterscape of the park in terms of their scenic and conservation value, and their overall amenity.
2. **Countryside:** To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
3. **Biodiversity:** To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features. We are the home of many areas of nature importance.
4. **Recreation:** To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
5. **Rural Economy:** To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
6. **Community Participation:** To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.

ANNEX 2 (Potential text changes to NPPF paragraphs that flow from our key suggestions)

Note: The paragraph numbers and 'base' text we use below are as proposed in the July 2024 consultation. The strikethrough and coloured text highlight change we consider could go some way to address failings with implementation of extant NPPF Green Belt policy and which appear to continue in the consultation draft. We recognise that there are other paragraphs needing refinement and welcome further dialogue.

140. Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment **and, where it lies close to large urban areas, enabling it to perform a strategic green infrastructure role;**
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

144. 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 is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider ~~grey belt~~ land in sustainable locations which is not already previously-developed **and which makes a limited contribution to Green Belt purposes**, and only then consider other sustainable Green Belt locations. 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. **When proposals for major development in the Green Belt come forward through development management, not on previously developed land and in advance of plan preparation or review, the same consideration to offsetting impact through compensatory improvements should be made, commensurate with the scale of development proposed and its context within the Green Belt.**

150. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. **The assessment of harm should take account of the potential of Green Belt land to perform a strategic green infrastructure role. This includes when proposals for major development come forward in the Green Belt through development management, not on previously developed land and in advance of plan preparation or review. In those cases, consideration shall be given to offsetting impact through compensatory improvements, as would apply in plan making.**

155. Where major development takes place on land which has been released from the Green Belt through plan preparation or review, or on sites in the Green Belt permitted through development management, the following contributions should be made:

- a. In the case of schemes involving the provision of housing, at least 50% affordable housing [with an appropriate proportion being Social Rent], subject to viability;

- b. Necessary improvements to local or national infrastructure; and
- c. The provision of new, or improvements to ~~existing~~ green spaces **and green infrastructure** that are **or could be made** accessible to the public. Where residential development is involved, the objective should be for new residents to be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

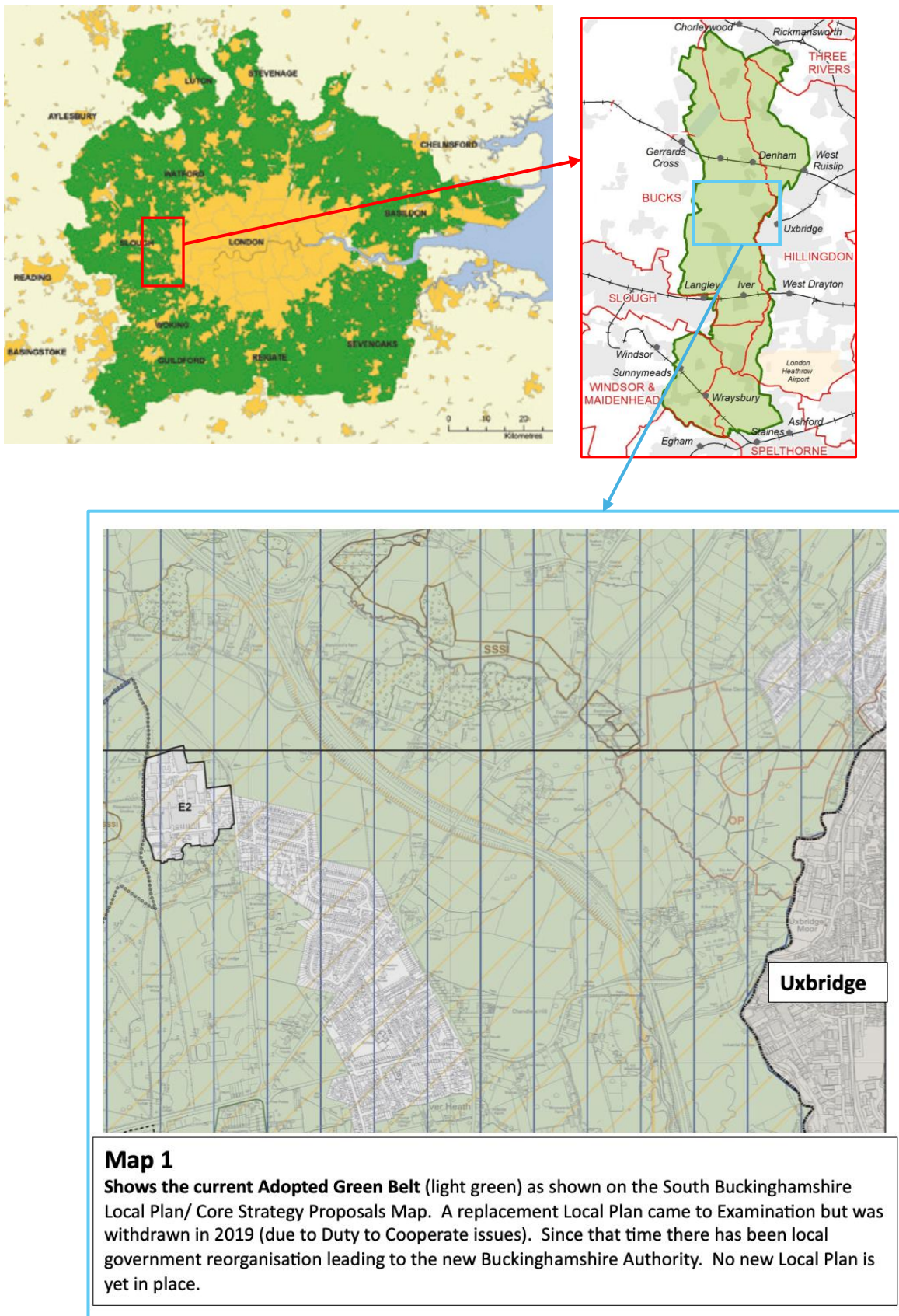
Definitions included in Annex 2: Glossary

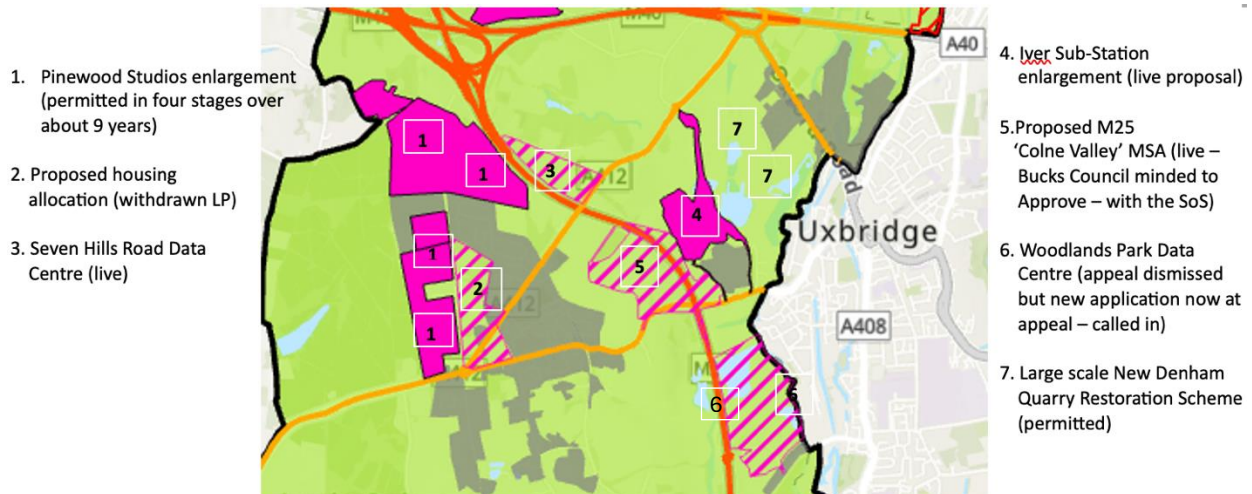
Grey belt: For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the green belt comprising Previously Developed Land **(that is lawful in planning terms)**. ~~and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).~~

Note about this change: As stated earlier (on page 4) we have deep concern about use of the term ‘grey belt’. But, for the purposes of making suggestions, we take it as a starting point. We delete the latter part of this definition in the glossary because we firmly consider that assessing whether land makes a limited contribution to Green Belt purposes should be an exercise central to the plan-making process. It is also critically important that such assessments address the potential of Green Belt land, where it lies close to large urban areas, to perform a strategic green infrastructure role. The countryside on the doorstep of those urban areas should be strategically planned so it can enhance the health and well-being of residents and generally address the environmental challenges faced by those urban centres.

ANNEX 3 (CVRP Case Study showing cumulative development proposals west of Uxbridge)

The red box on the Metropolitan (London) Green Belt shows the approximate location of the CVRP and the narrowness of GB here between large urban areas (notably Hillingdon and Slough)





Map 2

Illustrates the site areas of major (but piecemeal) development brought forward over the last 10 years.

Map 2 highlights major development sites in this zone that have come forward, a number of which have already been permitted under 'Very Special Circumstances' and others, some of which are live applications:

- No. 1 is the extensive Pinewood Studios site that (as can be seen from Map 1) began as a relatively small area ('E2') excluded from the Green Belt.
- No. 4 relates to a major sub-station development by the National Grid which 'PINS' has recently indicated can proceed in terms of compulsory purchase, but which is now going through the local authority planning process.
- No. 5 is the site for an MSA which has been referred to the Secretary of State under the 1938 Green Belt Act and as a departure from the development plan.
- No. 6 is the 'Woodlands' site for a data centre – whilst one appeal was dismissed in 2023 we understand that a 2024 application/ appeal has been 'called in'.

We understand that each proposal has a case for it, but our overriding concern is that these each (except site 2) has come forward separately, outside of any strategic plan or review of the Green Belt. This highlights what appears to be a major loophole in the consultation draft of the NPPF policy: Allowing very large schemes such as these to be considered and approved (under very special circumstances) the Furthermore, without assessing wider opportunities for connectivity and what the cumulative impact on the Green Belt would be. And all in the absence of any compensatory improvement proposals to the remaining Green Belt.

We make some suggestions for closing some of these loopholes in our Annex 2, but ask that, as much as possible, the revised NPPF ensures that any change to the Green Belt is plan-led rather than ad-hoc.

ANNEX 4 (CVRP 2024 Campaign Briefing Note – 2 pages)



Your Countryside in Crisis – A Call for Action

- A five-point Action Plan for better protection of the 'inner Green Belt' - the urban-rural fringe
- Using the Colne Valley Regional Park (on the doorstep of west London) as a case study - so its countryside can fulfil its potential for future generations - for people & wildlife
- This is a pro-countryside campaign, not an anti-development one.

Our Mission is: Persuade decision-makers to act now to protect the special landscape of the Colne Valley Regional Park, specifically safeguarding it for future generations and enabling it to realise its full potential for the benefit of people and wildlife.

Note: Actions in Green are for the Colne Valley Regional Park & Local Authorities. Actions in salmon are for government, with relevance for all areas of the England, especially 3. Planning Reform.

The Action Plan	What does this mean?
1. Influence Local Planning	- Ensure policies for Colne Valley Regional Park and rivers are included in local plans – to help Local Authorities plan positively in line with NPPF para 150.
2. Restore the Landscape	- Tie together Local Nature Recovery Strategies (LNRS) to focus on landscape/catchments across county boundaries (as this is how nature operates). - Prepare, and implement, a Local <u>Landscape</u> Recovery Strategy that complements LNRS's and focusses on landscape restoration. - Use this to inform local plans, strategies, design codes, GI plans, development briefs etc. It will also guide project development, fundraising and inform the design of planning applications and their mitigation.
3. Reform National Planning	<ul style="list-style-type: none"> • Add a sixth Green Belt 'purpose', to recognise the intrinsic value of countryside – as supporting green infrastructure for the quality of life of the cities/ towns that the Green Belts surround. • Require any major development in the Green Belt to be Plan Led, not via Very Special Circumstances (when it can avoid strategic mitigation & compensatory improvements). • Introduce strategic planning at a landscape-scale, beyond Local Authority boundaries, to provide a planning framework for where and how significant development need should be met, and strategic green corridors provided. • Ensure that all development in Green Belts close to urban areas leads to better connectivity with generous green corridors - for wildlife and people.
4. Establish Status	- Government to engage with the Colne Valley Regional Park as a case study to understand why a new form of designation is needed, then to implement. - The critical multifunctional countryside role for the 'inner' Green Belt immediately adjacent to cities is often overlooked by government, local authorities and developers when considering development proposals. - Add a new third type of Protected Landscape: 1) National Park, 2) National Landscape 3) <u>Regional Landscape</u> .
5. Protect Nature	- Evidence-led landscape scale designation that recognises the landscape context of the important Colne Valley wetland resource on the edge of 5 counties as nationally important for wildlife - similar to the Somerset 'Super Nature Reserve'.

Colne Valley Regional Park Trust – January 2024. Comments welcome to - enquiry@colnevalleypark.org.uk

Your Countryside in Crisis – A Call for Action



Where is the Colne Valley Regional Park?



Why is the Colne Valley a good case study?

Location: A large area of 'inner' Green Belt (GB) crossing many Local Authority boundaries.

Organisational Structure: Run by a registered charity, with a small core budget but leveraging major funding for countryside improvements.

Intense Pressure: Despite being GB we are seeing multiple major development proposals come forward with no overall planning and coordination.

Vision: As well as a [2019 GI Strategy](#) the Park has 6 core [objectives](#), aligning with Government policy.

Potential: Based around the River Colne, fed by the Chilterns' chalk streams, with fantastic wildlife, countryside, and country parks for people to enjoy. Assets that need connecting with other 'hidden' natural assets for it to realise its potential.

Why is existing Green Belt Policy not enough and what is the urgency?

Population in London and other centres is growing rapidly, but the intrinsic value and potential of the adjacent countryside is not central to Green Belt policy.

Our countryside can have multi-functional benefits – for physical and mental health, to address the biodiversity crisis, to combat climate change, for local food production etc.

And yet, over the last 5 years we have seen an onslaught of 'ad-hoc' large-scale developments across the Colne Valley, either under 'Very Special Circumstances' or in growth plans without strategic coordination.

Opportunities to connect city and countryside are being side-stepped and we are sleepwalking towards being left with a few isolated country parks and nature reserves. Any surviving landscape outside of managed sites will be of poor quality.

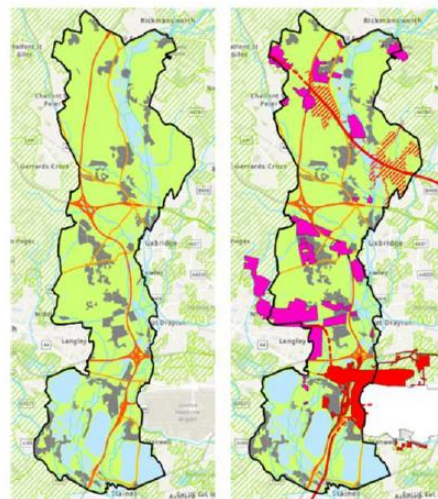
If we don't act on the five-point plan, then it is inevitable that the uncoordinated 'development frenzy' will continue. Connectivity opportunities for people and wildlife on the edge of London will be lost forever.

Useful Links

www.colnevalleypark.org.uk/project/campaign/

www.colnevalleypark.org.uk/why-we-need-to-protect-the-colne-valley-regional-park/

Proposals Mapping 2018 to mid 2023 (see separate map for more information on proposals).



2018 Base Map

Mid 2023 Proposals Map

ANNEX 5 - CVRP responses to particular consultation questions

Note: The questions we respond to and those most relevant to the Colne Valley Regional Park’s six objectives (set out on page 6 in our Annex 1). The responses link to the addressing the development issues we have faced across the CVRP and the suggestions we make for resolving them, as set out in this response.

Q	Question	Response
Maintaining effective co-operation and the move to strategic planning		
12	Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?	<p>Yes, and this needs to clarify how the challenge of cross boundary working and strategic planning matters across the Metropolitan Green Belt i.e. embracing both London and surrounding counties/ authorities.</p> <p>This does not just apply to provision of housing, but all forms of development and infrastructure, not forgetting that countryside green infrastructure should be seen as supportive infrastructure to the city – with consideration of blue infrastructure, connectivity of footpaths, wildlife corridors etc..</p> <p>Our experience in the Colne Valley, right on the western edge of London, is that proper, strategic, planning of the area does not take place because the resources and mechanisms for effective cross-boundary cooperation are not in place.</p> <p>Clarity is needed around what “where a strategic relationship exists” means in proposed new NPPF para 27. There is a strong strategic relationship between London and its surrounding Green Belt but no mechanism to facilitate the wider vision for the area.</p>
Chapter 5 – Brownfield, grey belt and the Green Belt		
21	Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?	<p>Whilst we support prioritising genuinely previously developed land for development protections are needed to ensure that such land is lawful in planning terms. By way of example, we are aware of unlawful airport parking sites where hard standings have been created and extensive development in ancient woodland, both without proper planning permission. The NPPF must avoid unintended consequences by encouraging what we call ‘planning by dereliction’.</p>
23	Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?	<p>We disagree.</p> <p>We do not believe that ‘grey belts’ exist, as a discrete zone, but we do recognise ‘grey’ parts, namely legitimately previously developed land.</p> <p>Identifying land that may make a limited contribution to Green Belt purposes should be a matter for plan making, not in planning applications under Very Special Circumstances.</p> <p>The definition is presently too open ended and should be tightened.</p>

		<p>See our comments on page 4 (Para 11) of our response and our suggestion on page 8 about the Grey Belt definition.</p> <p>We suggest that a better term/ word 'belt' be found.</p>
24	Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?	<p>Yes, wording is needed to prevent deliberate dereliction of land over a period, that may otherwise enhance development potential. This is a real risk.</p> <p>On page 8 of our response we suggest insertion of text in the definition saying "that is lawful in planning terms", but supporting guidance to elaborate on this is also needed to avoid this eventuality.</p>
25	Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?	<p>Yes, additional guidance is needed, most suitably in PPG, with hooks in the NPPF itself.</p> <p>But, critically, the Green Belt purposes themselves also need to be adjusted to reflect the potential positive 'green infrastructure' role, embracing connectivity for people/ communities and wildlife/nature.</p> <p>With the focus on intensifying development in large towns and cities, society's needs have changed and this adjustment of Green Belt purposes should be seen as part of making the Green Belt work for the 21st Century.</p> <p>We make suggestions on page 4 (our para 10) and in our Annex 2 (to adjust the wording of the five purposes in proposed NPPF para 140).</p>
26	Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?	<p>We do not consider that the wording is presently adequate.</p> <p>As well as adjusting the wording of the five purposes (see our suggestion in Annex 2 at page 7 of this response supporting guidance should be developed.</p> <p>This should address the potential contribution that Green Belt (and any 'grey' parts) could make to enhanced quality of life for urban areas e.g. through better urban - countryside connectivity and the land acting as countryside buffers relative to nearby SSSIs, country parks etc..</p>
27	Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?	<p>LNRs are critical but wording needs refining to address access to nature by people in addition to ecological considerations, not as an accident.</p> <p>In this way enhanced 'green infrastructure' in Green Belts can perform a true multi-functional role.</p>
28	Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?	<p>Refinements to wording are needed.</p> <p>How 'grey belt' is defined and applied needs to be revised to avoid confusion with the role of plan making.</p> <p>As outlined above (Q 23) there are drawbacks in relation to 'Very Special Circumstances' planning applications that need to be addressed.</p> <p>See our suggestions on pages 4, 5 and in Annex 2 of this response.</p>
29	Do you agree with our proposal to make clear that the release of land should not fundamentally undermine	<p>YES</p> <p>There is a qualification to this though. All Green Belts have a strategic role that crosses local authority</p>

	the function of the Green Belt across the area of the plan as a whole?	boundaries. To use the metropolitan green belt as an example a multitude of Plans will come forward. A strategic view will be critical to reinforce the function of the Green Belt (including any changes to it) to provide the context for those individual plans.
30	Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?	We do not agree. Major developments that come forward outside of the plan-making process, under 'VSC' (Very Special Circumstances) must be made to work harder to realise community benefit (community in the broadest sense). See our suggestions on pages 4, 5 and in Annex 2 of this response, for example to ensure that compensatory improvements to the 'remaining Green Belt' are always brought forward, as would apply if the same land came forward through a development plan. The guidance also needs to be drafted more tightly, and clarity included (possibly in PPG) to ensure Green Belt assessments and allocation of 'grey belt' status follows a proper process – and the provision only applies to housing.
31	Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?	Invariably proposals for major commercial and infrastructure development seek to address need/ demand across an area wider than a single local authority. Locations for such development should be plan-led and flow from the emerging proposals for strategic/ cross-border planning and cooperation. This should lead to appropriate supporting infrastructure and development being in the right places, not where developers can buy plots of green belt land cheaply. The ability of local areas to support a number of such projects in a small area will have an impact on local communities which should be significant consideration.
36	Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?	YES, but consider that the approach needs to be better clarified and broadened: The policy provision should not be just about the development in question providing access to quality green space but also using a development site to facilitate the creation of strategic green infrastructure, improving active travel connectivity from nearby urban areas to green space (within the Green Belt) beyond the site in question.
Chapter 7 – Building infrastructure to grow the economy		
64	Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?	We do not express views on the use of the NSIP regime, as such. Our concern is that when sites within the Green Belt are identified, major development is not brought forward on sites in isolation and needs to be plan-led. Consideration is needed (e.g. through strategic plans) of how the wider Green Belt in an area should best function, with enhancement of strategic green infrastructure and the connectivity that flows from that.