

Environmental Audit Committee - Call for evidence – Friday 20th December 2024

<https://committees.parliament.uk/call-for-evidence/3474/>

This submission is made by the Colne Valley Regional Park (CVRP), first established by several local authorities in 1965. It is now run as a charitable trust with the objective of improving its 43 sq. miles of countryside on the western edge of London for the lasting benefit of people and nature.

1. Our response concerns the Government’s proposed reforms to national planning policy (revised NPPF) and the effect on environmental protections and current approaches to sustainable development. It addresses the planning framework in the recently revised NPPF and five of the questions (1, 3, 4, 6 and 8) posed in the Committee’s terms of reference. In summary these questions cover:
 - The protection and enhancement of the environment and the ‘presumption in favour of sustainable development’.
 - The promotion of sustainable social and environmental benefits e.g. active travel routes.
 - The protection of the natural environment and the implementation of local nature recovery strategies

Our central premise is that the countryside within the ‘inner’ Green Belt on the edge of large cities has a critical role to play in improving the health and well-being of the millions of people living in large urban centres. Lying west of London, the CVRP is on the edge of nine local authorities and we have experienced how the planning system has (or has not) worked in the last decade or so. This is not about whether there should be building in the Green Belt; it is about properly valuing what the countryside on the edge of cities can offer – so that if building does happen, it effectively connects that countryside with the urban areas it surrounds. The current NPPF approach to Green Belt fails to recognise this strategically important aspect.

2. We applaud recent initiatives to protect and improve Nature, particularly Biodiversity Net Gain (BNG) and Local Nature Recovery Strategies (LNRS) but see a major omission when it comes to policy and decisions affecting the Green Belt on the edge of cities. The key issue is that neither BNG nor LNRS address people’s access to the natural environment – something assuming greater importance next to large urban areas, with implications for well-being and the economy.
3. We note that the five Green Belt purposes are geared more to preventing things happening, rather than valuing the potential of countryside next to large urban areas to enable people’s contact with nature and countryside with all its potential well-being benefits:
 - For better mental health – research backs this up – with a couple of examples below¹
 - For better physical health – active travel – addressing the obesity crisis
 - For local food production – connecting people with where their food comes from

¹https://assets.publishing.service.gov.uk/media/5f202e0de90e071a5a924316/Improving_access_to Greenspace_2020_review.pdf
<https://www.ons.gov.uk/economy/environmentalaccounts/articles/amillionfewerpeoplearegaininghealthbenefitsfromnaturesince2020/2023-11-27>

4. In our September 2024 response to the Government's draft NPPF we called for changes which appear to have been ignored. The wording in the revisions published on 12th December 2024 are even less accommodating of nature and environmental considerations than the consultation draft. Significantly, two purposes of the Green Belt relating to 'safeguarding the countryside' and 'recycling of derelict land' have been bypassed when it comes to considering whether land can be regarded grey belt.
5. We provide our September 2024 draft NPPF response as a separate attachment. This includes a summary on the first page and useful information about the Colne Valley Regional Park.
6. For your information, we also made a submission to the recent House of Lords short inquiry into so-called 'Grey Belt'. This submission can be provided if required.
7. Our approach is a pro-countryside, not an anti-development, one. We genuinely believe there is now a real opportunity for a 'win-win' solution.
8. We urge the Committee to highlight the need for the following changes to national policy:
 - a) **Adjust the five Green Belt purposes to embrace the strategic green infrastructure (GI) role** that it can perform (using the definition of GI in NPPF page 73 – see Annex 3). This would be consistent with the ambition expressed by the Government, only this week, in its working paper on development and nature recovery (see extract in Annex 4).
 - b) **Make NPPF policy in para 151 (Annex 1) about positive planning for beneficial use of the Green Belt a requirement, rather than something optional.**
 - c) **Reinforce the need for workable mechanisms to achieve strategic planning across political boundaries and beyond individual development sites/areas.** Achieving connectivity for active travel and wildlife requires strategies across boundaries and sites. As an example, this week's White Paper on Devolution calls for 'Spatial Development Strategies' across mayoral and other areas, but with no apparent reference to cross-boundary co-ordination.
 - d) **Alter the way policy for 'Grey Belt' areas in the Green Belt works** to ensure:
 - Decisions consider **all purposes** of the Green Belt, not just three
 - Piecemeal land release in the Green Belt is avoided and opportunities for 'natural corridors' for active travel and wildlife are grasped.
 - e) **Widen the 'Golden Rules' for Green Belt development to embrace more than housing** (new NPPF para 156 onwards) – non-residential growth is a big issue affecting green belt land around cities with significant commercial gain the norm.
 - f) **Review the 'Golden Rules' to include wording** from the former NPPF (end of para 147 – highlighted in Annex 2) that required: "...*compensatory improvements to the environmental quality and accessibility of remaining Green Belt land...*" when land is released from the Green Belt. This wording to also apply to major developments in the Green Belt that come forward outside of Plans, under '**Very Special Circumstances**'.

Without these changes, the Colne Valley Regional Park believes there will be a fragmentation of the Green Belt and all levels of government will miss opportunities for to achieve public benefit through better connectivity between cities and the green belts that surround them.

9. With further planning reform and detail in 2025 (standard Development Management policies and a shorter, more strategic NPPF) the opportunity exists to remedy errors made in the recent NPPF, thereby achieving a better deal for the natural environment and people's access to it.
10. These changes are necessary if the planning system is to result in sustainable development that achieves the right balance between economic, social and environmental objectives.
11. If government is unable to incorporate our changes (a to f as outlined above) into national planning policy then it remains essential that they find the means to safeguard the CVRP's regional importance for people and national importance for wildlife. Otherwise, 60 years of vision and partnership working across the edge of five counties will be thrown away.

Revised NPPF (Dec 2024) Paragraph 151

151. Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 below should apply.

Former text in December 2023 Version of NPPF – Para 147 (our highlighting is to flag wording that has been omitted in the December 2024 Version of the NPPF)

147. 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, plans 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.

Green infrastructure: A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Extract from joint DHCLG & DEFRA “PLANNING REFORM WORKING PAPER - DEVELOPMENT AND NATURE RECOVERY” (15.12.24)

https://assets.publishing.service.gov.uk/media/675db3f7cfbf84c3b2bcf9f3/Planning_Reform_Working_Paper_-_Development_and_Nature_Recovery.pdf

10. In adopting this more strategic approach – one which delivers more effectively for nature while enabling development to proceed where it is needed – we want to:

- a. take a holistic view of nature recovery to secure better environmental outcomes;
- b. go beyond offsetting environmental impacts and instead use development to deliver positive outcomes for nature recovery;
- c. improve efficiency and reduce duplication to ensure every pound spent helps deliver our environmental goals;
- d. make it far easier for developers to discharge a range of environmental obligations, and provide the legal certainty necessary to underpin substantial capital investment;
- e. give delivery partners the tools they need to generate positive outcomes for nature, empowering them to make the right choices to deliver nature recovery;
- f. establish a robust and transparent framework to monitor delivery of environmental outcomes; and
- g. create a lasting legacy of environmental improvement that will promote better public health through increased access to high quality green spaces. ”