

Very special circumstances and the Green Belt

A policy paper from Saltford Environment Group
(27 January 2016)

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“The economy is a wholly owned subsidiary of the environment”

Gaylord Nelson, American politician (1916 - 2005)

1. Introduction

01 This policy paper has been produced by Saltford Environment Group to state its position and to help inform discussion and negotiations for the production of the West of England Joint Spatial Plan. It makes the case that a short-term and narrow approach to land management, and in particular developments on finite Green Belt and agricultural land, is detrimental to the UK and not just the West of England. The economic, social and environmental benefits of protecting such land far outweigh any short-term economic benefits from destroying it for housing and related development. Planning policy and the democratic mandates of our political leaders also rule against new developments on the Green Belt; a much valued designation the protection of which is increasingly vital as this paper demonstrates.

“Don't blight the land that feeds you”

02 Wherever we live, whether it is in rural areas or in towns and cities like Bristol and Bath, a healthy countryside is vital not just for our quality of life, but for the medium to long term health and welfare of the UK and the ongoing ability of the UK to feed itself from a mix of home produced food and imported food against a background of two important factors facing us all in the 21st Century, a growing population and climate change.

03 Continued population growth in the UK and a housing shortage, particularly of affordable housing, is increasing the pressure on local authorities from developers to build new housing on Green Belt and agricultural land in the UK. Furthermore such developments invariably incur lower development costs but higher market values and thus represent a much more profitable and attractive option for developers - but not for local communities or those seeking an affordable home.

04 The need to maintain healthy eco-systems in the UK puts a higher economic value on Green Belt and agricultural land. Much more so than using that land for housing and related development; it is very difficult to identify any special circumstances that outweigh the need to protect Green Belt and agricultural land.

2. Population growth, food security and protecting our 'natural capital'

“Our global food system... does not meet the basic needs of the world's rising population... demand is growing at the same time as availability of key resources, including water and productive land, decreases”

Forum for the Future

05 There has been no real attempt by successive governments to calculate and address the current and future carrying capacity of the UK that could be realistically sustained and use such information to inform and guide land use planning. Likewise the impact of population growth within the UK's resident population and/or from net

inward migration on the UK's carrying capacity continues to be overlooked as has any real attempt to work towards achieving balanced migration* for the UK.

*Note: A policy of balanced migration (inward equals outward over 2, 3 or 4-year time periods) could permit a fair share of inward migration on humanitarian grounds and to allow the filling of specific skills shortages.

06 Against this vacuum of knowledge and lack of seriously considered medium to long term policy making, it would be irresponsible for local or national Government decision makers to permit the loss of our most valuable finite asset, land, that could be put to food production uses or has an ecological role in providing eco-system support and habitat (e.g. habitat for pollinating insects) necessary to support food production. Such land also has an increasingly important role in flood mitigation and protection.

07 At 246 people/km² the UK is the third most densely populated country in the EU, behind Netherlands and Belgium (2006 data from Eurostat). The UK is currently about 60% self-sufficient in food and each year imports approximately 40% of the food we require to feed our resident population (2014 data, source: Defra, 2015).

08 According to the UN (2012) climate change will depress agricultural yields by 15 to 50% in most countries by 2050 whilst agricultural land lost to land degradation is estimated at 12M hectares p.a. (23 hectares/minute, 1 hectare = 2.47 acres); enough to produce up to 20M tonnes of grain. Furthermore, the overall trend of steadily declining agricultural yields will be subject to widely fluctuating yields in the UK and worldwide due to the growing incidence of extreme weather events, such as storms, floods and heatwaves. For example, total UK cereal production had significant dips in 2001, 2007, 2012 and 2013 linked to adverse weather conditions in those years (source: Defra, 2015).

09 Food security is an economic, social and environmental issue. It is about consumers having access at all times to sufficient, safe and nutritious food for an active and healthy life at affordable prices. To achieve this, our food supply must be reliable and resilient to shocks and crises. Food must also be produced in a way that is environmentally sustainable or we will be storing up problems for the medium to long term.

10 Protecting food security has to run in parallel with other priorities such as tackling climate change (2015 was the warmest year on record since record keeping began in 1880, *NASA 2016*) and securing a healthy natural environment. These collectively are likely to be the most pressing economic and social factors affecting the UK in the 21st Century. The question is not IF food security will become a serious issue but WHEN.

11 There are three pertinent questions that remain unanswered but they affect decisions concerning the potential loss of Green Belt and agricultural land to non-food development:-

1. Food security is a global issue. For how long can we rely on other countries to meet our growing food requirements as they too face their own challenges of population growth and climate change impacts?
2. Like most nations the UK will always need to trade foodstuffs. Do we have a duty to ourselves and the international community to protect and enhance (organic) food production within our own shores?
3. What is the UK's carrying capacity now and what will it be in future decades?

3. Where do we put new housing?

12 The scope for more infill housing within Salford's housing boundary is limited. In recent years planning permission has been obtained for approximately 2 to 3 new homes/year on infill sites within the housing development boundary together with many home extensions thus providing additional accommodation space.

13 Salford Parish Council submitted comments in January 2016 in response to the *West of England Joint Spatial Plan 'Issues and Options'* consultation. The Parish Council's submission answered the question "Where do we put new housing?":

“New housing needs to be located close to jobs”

13.1 Salford Parish Council is concerned that the continuous addition of new housing developments to existing settlements in towns and rural areas to meet the projected housing needs of Bristol and Bath will create many more problems than are solved for the region and its communities.

13.2 The resulting negative impacts include: more overloading of transport systems; reduced air quality arising from higher traffic volumes and congestion; local services put under increasing strain, loss of recreational green spaces; loss of Green Belt so that natural habitats including wildlife corridors are depleted; local tourism/leisure businesses put at risk; and agricultural land permanently lost for food production purposes. Those impacts underline why that approach is not sustainable development.

13.3 Salford has the status of an Air Quality Management Area on part of the main A4 road through the village due to the traffic volumes it currently experiences leading to periodic levels of dangerously high NO_x levels being reached; adding new housing developments and thus road transport in the area would exacerbate this existing problem. Furthermore the Issues and Options paper at paragraph 2.18 makes the transport case for not adding further housing developments to towns and rural areas (i.e. including Salford) by stating that *“there is an imbalance of jobs over resident workers in central Bristol and Bath and an imbalance of workers over jobs in Weston-Super-Mare, the towns and rural areas with resultant unsustainable commuting patterns”*. In other words, **new housing needs to be located close to jobs.**

13.4 To prevent the piecemeal destruction of the West of England’s open spaces and Green Belt over and above existing Core Strategies, we request that:

1. the first priority should be to create affordable attractive housing on suitable brown field sites close to employment - with developers and architects competing to produce the best designs;
2. the design and location of further new housing developments in the Joint Spatial Plan should avoid overloading towns and rural areas (by implementing 1); and
3. Green Belt land in the West of England should be protected from development and recognised as a high value irreplaceable asset thus reflecting the Government’s policy on protecting the Green Belt against urban sprawl (see section on Green Belt planning policy below).

13.5 If the need (not demand) for new housing continues to outstrip the supply from brown field sites in the longer term, a region-wide consultation could be held on whether a new “Garden City” would be appropriate and where it might be located. A new “Garden City” should be genuine sustainable development, i.e. a self-contained community surrounded by Green Belt, containing proportionate areas of housing, industry and commerce, green spaces and agriculture, yet with good public transport routes and access to Bristol or Bath.

4. Green Belt planning policy

14 The National Planning Policy Framework (NPPF, 2012) states (para. 79) that: “the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

15 The NPPF states (para. 80) that the Green Belt serves 5 purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns;
- and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

16 The emphasis in this paper on securing land from development to protect the nation's food security gives the word "**permanence**" in the NPPF added importance and even more reason for decision makers not to undermine that permanence.

17 "Very special circumstances" are the only circumstances where NPPF permits development on the Green Belt. Defining "very special circumstances" however can be a bone of contention in planning disputes affecting the Green Belt.

18 Helpfully, Planning Ministers have also through public statements (published on gov.uk) made it clear that local authorities should not permit development on Green Belt land, even if that means they would not be able to meet housing needs in their area. Here are three:

**(1) Extract from (DCLG) Press Release "Councils must protect our precious green belt land"
4.10.2014:-**

"...Once [housing] need has been assessed, the local planning authority should prepare a strategic housing land availability assessment to establish realistic assumptions about the availability, suitability and the likely economic viability... and in so doing take account of any constraints such as green belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need."

[Note: in other words the Green Belt is a constraint that may be a permissible reason used by the authority for not meeting its need for housing.]

**(2) Extract from (DCLG) Press Release "New rules further strengthen green belt protections"
16.10.2014:-**

Communities Secretary Eric Pickles said:

I am crystal clear that the green belt must be protected from development, so it can continue to offer a strong defence against urban sprawl.

**(3) Extract from Press Release "Thousands more homes to be developed in planning shake up"
(new measures that will make it easier to turn underused office buildings into new homes) 13.10.2015:-**

"We're determined that, both in Whitehall and in town halls, everything is done to get the homes we need built."

"Today's measures will mean we can tap into the potential of underused buildings to offer new homes for first-time buyers and families long into the future, breathing new life into neighbourhoods and at the same time protecting our precious green belt."

19 NPPF also states (para 73) that "Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities." It is well documented that parks and other green spaces are essential for the quality of life and good mental health of city dwellers (e.g. Exeter University Medical School research study findings, 2014).

20 Likewise the rural setting and relatively easy access to open countryside for Bristol and Bath (including through walking, cycling and use of public transport) with their combined populations exceeding 500,000 are strong reasons for not turning the West of England into one large urban conurbation by the piecemeal development and loss of the region's countryside. Such development will reduce the attractiveness of the region as a place to live, work and spend leisure time whilst undermining local tourism businesses.

21 Salford Parish Council's comments (January 2016) in response to the *West of England Joint Spatial Plan 'Issues and Options'* consultation also referred to Salford's Placemaking Plan and the planning decision by the Secretary of State in 2014 concerning a planning application on Salford's Green Belt. The Secretary of State determined that the proposed development of up to 99 dwellings was inappropriate causing harm to the Green Belt's openness and purpose of preventing encroachment into the countryside. The Parish Council comments were:-

21.1 Looking at Salford specifically, the Salford Placemaking Plan was produced (and is published on the Parish Council website) following community consultation in 2013.

21.2 The purpose of this plan is to complement the strategic planning framework provided in Bath & North East Somerset Council's Core Strategy. It provides an updated and refreshed planning policy framework for managing development in the Parish of Salford. It also describes why Salford's Green Belt is unsuitable for housing development. The following is a short extract from the Green Belt character assessment (Chapter 6):

21.3 The Cotswold AONB ridge and the distinctive local landmark of Kelston Round Hill (also known as Kelston Tump) together with Salford's Green Belt and the river Avon provides a rural setting for the village. Despite Salford's proximity to the cities of Bath and Bristol and the neighbouring town of Keynsham, this landscape gives Salford its own distinctive character complementing and preserving both the setting of Salford's Conservation Area with its historical buildings and the newer housing developments within the village.

21.4 The openness of Salford's Green Belt also provides a sense of permanence to the countryside surrounding the village, provides separation whilst keeping in check urban sprawl from Keynsham, Bristol and Bath, and helps to safeguard the adjacent countryside including the Cotswold AONB from encroachment.

21.5 It is also a very important green infrastructure asset for Salford and the wider community of Bath & North East Somerset. It provides ecosystems that support agriculture and wildlife together with an element of flood protection for the village from the river Avon and from surface water flooding arising from extreme rainfall events.

22 Salford's Placemaking Plan in Chapter 6 (paragraph 6.7.3) highlights the reasons why developers lobby for housing development, that cannot realistically be described as affordable, in Salford's Green Belt whilst explaining why, in the opinion of the Secretary of State for Communities and Local Government, such development is inappropriate:-

22.1 The relatively high property prices in Salford put a high commercial value on any land that becomes available for development and thus Salford's Green Belt is a target for property developers. An example of this was the Salford Green Belt Appeal Inquiry in August 2013 following the non-determination of a planning application by developers to build a housing estate of up to 99 dwellings on the fields within the Green Belt south of Manor Road...

*22.2 ...Following his decision in September 2013 to make the determination himself, the Secretary of State for Communities and Local Government dismissed the appeal and refused planning permission on 4 March 2014. In concluding that the appeal proposals were inappropriate development in the Green Belt causing harm to the Green Belt's openness and purpose of preventing encroachment into the countryside, the Secretary of State said **"the proposed development would result in an unacceptable reduction of the Green Belt in that area."** He was also **"mindful that the site lies within a substantial sub-area of Green Belt identified as strongly serving the purpose of safeguarding the countryside from encroachment, and attributes considerable weight to this issue in the planning balance."***

5. Democracy and political considerations in B&NES and Saltford

23 There is no political mandate or permission from the residents of B&NES or Saltford to allow any loss of the Green Belt to development. The ruling Conservative administration at B&NES Council was elected in May 2015 on a manifesto to defend the Green Belt from development. The elected MP, Jacob Rees-Mogg MP (Cons), was also elected in May 2015 on a pro-Green Belt agenda whilst stating that he would be “*strongly opposing Labour’s ideas to allow a city like Bristol to expand into Somerset*”.

24 The B&NES Core Strategy adopted in 2014 by the previous Lib Dem administration at B&NES does regrettably include some loss of Green Belt in B&NES (not in Saltford) and that was intended to run until 2029 with 5-yearly reviews whilst recognising that the first review would be brought forward to fit with the timing for the creation of a West of England Joint Spatial Plan. However no political mandate or permission exists from the residents of B&NES to permit the surrender of any Green Belt over and above that lost in the 2014 Core Strategy.

25 As the protection of our Green Belt is such a fundamental issue for the well-being of today’s and future generations, no loss of Green Belt to developers could be considered democratically permissible in the B&NES area without a specific political mandate.

6. Sustainable development

26 Sustainable development is about taking a long-term view so that we do not compromise “*the ability of future generations to meet their own needs*”. Decisions concerning new housing developments, particularly those on the Green Belt and on agricultural land, therefore need to take a longer term view and not be taken in haste.

27 Sustainable development is central to the NPPF. It follows that if development is not sustainable, taking a wider and more holistic view than just the economic and housing needs of a sub-region like the West of England, then it is unsustainable. As this paper demonstrates, in the years and decades ahead climate change, population growth (including migration) and the UK’s carrying capacity and its ability to feed itself will increasingly become major defining issues facing the UK. Green Belt and agricultural land therefore has a much higher economic, social and environmental value than as a location for housing and related development.

28 A more imaginative approach is needed for meeting future housing needs than taking the short-term option of using our valuable Green Belt and agricultural land. Building better on brown field sites, incentives for converting existing large homes into multiple units, creating sustainable new settlements, or a mix of all these options, might not provide rapid financial returns for developers but has to be more sustainable than destroying our most valuable finite asset.

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