

**House of Lords Built Environment Committee short inquiry into the Grey Belt in England
Submission by Colne Valley Regional Park (CVRP)**

	Submission from the Colne Valley Regional Park (CVRP)
Introduction to me and the organisation	<p>My name is Jerry Unsworth. I am a Chartered Town Planner (MRTPI) and work on a part-time basis for the Colne Valley Regional Park. The organisation is a registered charity. I am making this submission on its behalf.</p> <p>The CVRP was created by a consortium of local authorities in 1965 to co-ordinate and promote the improvement of the Park in line with objectives that remain aligned with national planning policy.</p> <p>Annex 1 to this submission provides background on the CVRP. The Park covers over 110,000 hectares between Rickmansworth in the north to Staines/the Thames in the south. It adjoins the western side of the capital and crosses the boundaries of nine local authorities. The Regional Park features a network of 200km of rivers, more than 70 lakes and associated wetland habitats and paths on the valley floor at the edge of London, Herts, Bucks, Berks and Surrey.</p> <p>Over the last 10 years I have been supporting the CVRP on mitigation for major infrastructure projects (namely HS2 and proposed Heathrow third runway expansion) and various other strategic development issues. This includes liaising with the various local planning authorities. Until 2014, I was Head of Planning and Sustainability at Wycombe District Council, an authority with a large tract of Metropolitan Green Belt. My experience, particularly over the last decade since the demise of regional planning, has highlighted the areas where Green Belt policy needs urgent improvement.</p>
Reason for submitting evidence	<p>We welcome this review of Green Belt policy and our submission draws on the CVRP's extensive experience of the significant – and rapidly increasing – development pressures on the edge of our capital.</p> <p>We see loopholes in the consultation draft NPPF that frustrate the implementation of strategic improvements to this large area of Metropolitan Green Belt for the benefit of millions of people. The experience we have and the risks we identify with 'grey belt' are, we believe, relevant to all Green Belt areas lying next to cities and urban areas.</p> <p>We draw on our response to the recent government NPPF consultation and our Annexes 1-3 to this submission also formed part of that response. We believe the CVRP could be used as a uniquely valuable case study.</p>
Summary of our submission and the context of our approach	<p>The CVRP takes a pro-countryside, not an anti-development, approach to planning across our area.</p> <p>Our suggestions in this submission (and in our response to the government's recent consultation) reflect a view that the Green Belt on the edge of large cities should have a key 'positive' role towards improving the quality of life for urban dwellers and our environment around cities – enabling ready access to the countryside, local food production, addressing the challenges of climate change, and enhancing biodiversity. This points to great care being needed in establishing and defining the 'grey belt' initiative.</p> <p>References to 'Grey Belt' and its definition need tightening up to avoid unintended consequences.</p>

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	<p>We question use of the term ‘grey belt’ to embrace both ‘previously developed land’ and other land in the Green Belt that may be regarded as making a limited contribution to Green Belt purposes. The latter stage should be a matter for plan-making and, if the government wishes to encourage Green Belt reviews to facilitate appropriate development, it should find another means for doing that.</p> <p>The type of land deemed to be making a ‘limited contribution’ to Green Belt purposes also begs the question whether the wording of the Green Belt purposes need review. We suggest a small wording change to bring in a strategic green infrastructure role for the Green Belt where it lies close to large urban areas. This is explained below in point 4 of our submission (in response to the Inquiry’s Q1), with the possible wording change in ANNEX 2.</p> <p>We recognise some Green Belt land has a lawful history of being ‘previously developed’, but rigorous checks are essential if abuse of the system is to be avoided.</p>
<p>1. What is your assessment of the Government’s definition of “Grey Belt”?</p> <p>a. What is your understanding of what makes a “limited contribution” to achieving the purposes of the Green Belt?</p>	<p>Our experience, based on our involvement in development issues across the CVRP, particularly over the last decade, indicates there is the kernel of a sound planning approach with ‘Grey Belt’, but some key issues must be addressed if it is to be effective:</p> <ol style="list-style-type: none"> 1. The ‘grey belt’ definition is too loose and needs tightening up to avoid unintended consequences. 2. In our view, the phrase ‘Grey Belt’ is inaccurate and misleading. Whilst there are ‘grey’ pockets of land which may be suitable for development or landscape restoration, these are not, in our experience, so widespread as to represent a ‘belt’. 3. Defining ‘Grey Belt’ should be limited to identifying existing ‘previously developed land’ and a different term found for the exercise of allocating land for development in the Green Belt that may make a limited contribution to GB purposes. This latter exercise should be a function of plan-making. The approach currently being proposed is confused and, therefore, weak. 4. Some land on the edge of Green Belts, close to the cities they surround, may be ‘grey’ but such land can often represent an opportunity to reconnect the city to the countryside beyond. Realisation of this opportunity, for public benefit for millions of people, is a key reason why we call for an adjustment to the five Green Belt purposes to ensure a more rounded approach to whether a piece of land makes a ‘limited’ contribution. <p>The new government has said¹ “we must review the post-war Green Belt policy to make sure it better meets the needs of present and future generations”. But the wording of the five purposes is then left untouched. This is an important issue when considering the issue of what (grey belt) land may make a ‘limited contribution’ to achieving the purposes of the Green Belt.</p>

¹ In para. 2, Section 5 (Brownfield, grey belt and the Green Belt) on page 24 of the Government’s paper dated 2nd August 2024 accompanying the consultation on the proposed changes to the NPPF

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	<p>We believe it is time for a small, but critical, adjustment to be made to the five Green Belt purposes - to recognise the important green infrastructure role that the Green Belt can play giving people living in large urban areas ready access to the closest areas of nature and countryside to those cities and towns. The suggestion we made, for a wording change to the five purposes, is included in our ANNEX 2 below.</p> <p>This wording change, giving Green Belts a more positive (well-being etc.) purpose is, we believe, essential if ‘grey belt’ and other assessments of possible development on Green Belt land are to recognise Green Belt’s ‘green infrastructure’ role, both existing and potential, where it lies close to urban areas. As highlighted in the government’s own definition (in the NPPF’s glossary of terms) ‘green infrastructure’ brings with it the potential to deliver a wide range of environmental, economic, health and wellbeing benefits - for nature, climate, local and wider communities and prosperity.</p> <p>If the government is to move forward with the grey belt idea, in whatever form, it is essential that assessments of the land in question reflect a ‘rounded’ approach to planning our Green Belts. This is not an anti-development stance but meant to be a ‘win-win’ one.</p> <p>5. We can see that some landowners and developers will, by stealth, deliberately make their land ‘grey’ and there will be more speculative planning applications where applicants come up with their own interpretation of ‘grey belt’. We can provide numerous examples of unconsented development – ranging from car parks around Heathrow to major development in irreplaceable ancient woodland.</p> <p>Local authorities are already overstretched trying to keep up with contraventions of planning control. We believe there will be yet more, ‘planning by dereliction’. To prevent this, it is essential that policy requires prior checks to determine whether ‘grey’ land has <i>lawfully</i> gained the status of being ‘previously developed land’.</p>
<p>2. Do you think the Government’s Grey Belt proposals will contribute to delivering new homes across the country and, if so, how quickly?</p>	<p><i>We do not wish to comment on this question</i></p>
<p>3. Do the current proposals for identifying Grey Belt land provide local planning authorities with sufficient scope to meet their housing targets and the needs of local communities?</p>	<p><i>We do not wish to comment on this question</i></p>
<p>4. Do you think the proposed sequential test for allocating land in the Green Belt for development will provide sufficient protection for “high quality” Green Belt land whilst still ensuring sufficient</p>	<p>Assessments of the suitability of Green Belt for development should involve more than an assessment of whether the land in question is ‘high quality’ now (in Green Belt terms). It should also be about what potential role the land could play, for instance providing a key link in active travel and biodiversity corridors which would benefit people and nature. This is particularly relevant at the immediate edge of large urban areas.</p> <p>As well as NPPF policy wording reflecting this aspect, assessing quality and potential requires a strategic review and should be a matter for plan-making,</p>

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<p>land is released for new housing? a. The current NPPF designates specific categories of land as “areas of particular importance” which cannot be developed and would be excluded from being considered Grey Belt land. Should the Government review which areas receive this designation?</p>	<p>not <i>ad hoc</i> applications outside of a Plan. More clarity is required around the role of strategic planning and how that will be rolled out.</p> <p>On the question of excluding “<i>areas of particular importance</i>”, we presume this is referring to those areas defined in footnote 7 to the NPPF and we agree those areas should be excluded from consideration for development and becoming part of a grey belt.</p> <p>The government does need to review how “<i>areas of particular importance</i>” are defined, and provide for this to be determined via the local plan-making process. The Green Belt was introduced as a strategic policy, and we believe a more strategic approach needs to be taken to determine the suitability of land for development. This is another example of the concept of ‘grey belt’ being taken too far.</p> <p>If the principle of development is deemed to be acceptable (after due assessment) there will be many variants on <u>how</u> development should happen, including delivering connectivity with the wider area, and realising other aspects of a strategic vision.</p>
<p>5. What infrastructure and local amenities are necessary to ensure that a Grey Belt housing development is a good place to live? a. Should the identification of Grey Belt land be influenced by the proximity of public transport amenities or other services, or is this better handled through individual planning applications? b. How can identified Grey Belt sites be connected with social infrastructure such as schools and health facilities?</p>	<p>It should be made clear in the NPPF that the definition of infrastructure in relation to development on ‘grey belt’ land embraces the provision and improvement of green and blue infrastructure, as well as ‘hard’ infrastructure.</p> <p>Parts a. and b. of this question go to the heart of what is wrong with the proposed approach to defining ‘grey belt’.</p> <p>The decision on whether land is suitable to allocate for development (potentially justified by the level of need and not undermining the Green Belt purposes) should be a matter for plan-making, not reached through individual planning applications.</p> <p>Matters such as identifying the proximity of public transport and the potential for other supporting infrastructure and amenities should form part of the plan-making process. In that way, any growth would be co-ordinated and planned positively with enhanced, supporting, green and blue infrastructure.</p> <p>Specifically with regard to question 5a) proximity of public transport: public transport flows in two directions – transport hubs, particularly railway stations, have great potential for city dwellers to reach the countryside. Therefore, if development is to be planned around public transport, it should incorporate attractive and wide green corridors to allow city dwellers to reach the path network and access countryside attractions directly from the railway station.</p>
<p>6. The Government has pointed to disused petrol stations and car parks as instances of Grey Belt land. Are any additional special measures needed to support the potential decontamination of Grey Belt land, beyond those that are currently available?</p>	<p><i>We do not wish to comment on this question</i></p>
<p>7. The government has proposed a 50 per cent affordable housing target on</p>	<p><i>We do not wish to comment on this question</i></p>

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<i>Grey Belt sites. Is the current approach to viability assessments and s106 agreements able to deliver this?</i>	
<i>8. In order to facilitate Grey Belt development, what flexibility in the process could be introduced without compromising the Government's overall housebuilding objectives?</i>	<i>We do not wish to comment on this question</i>

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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.



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ANNEX 2 (Potential text changes to NPPF paragraphs that flow from the key suggestions in our Sept. 2024 response to government)

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.**

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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.

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ANNEX 3 (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 Landscape 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) Regional Landscape.
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'.

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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.

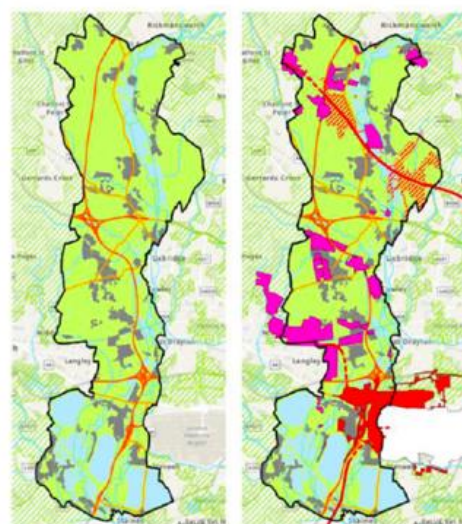
If we don't act on the five-point plan, then it is inevitable that the uncoordinated 'development frenzy' will continue. Connectivity opportunities for people and wildlife on the edge of London will be lost forever.

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