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Planning Icons: Myth and Practice

Draft Paper

by

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GREEN BELT AND RURAL ECONOMY

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**Planning Icons: Myth and Practice
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1.0 INTRODUCTION

- 1.1 The Green Belt is one of the longest and well established planning icons having been official government policy for four decades and having a pedigree stretching back over the last hundred years and before. Unlike some other planning icons the length and relative clarity of Green Belt policy makes an assessment of its myths and its application in practice rather more straightforward than some other planning icons even first thing on a Sunday morning!
- 1.2 First of all, therefore, I would like to spend a little time on the evolution of Green Belt policy from its earliest origins to the seminal circulars of the 1950s; the "wobble" of the early 1980s; and present policy in the form of PPG2 'Green Belts' together with its draft revision. Allied to this is the application of Green Belt policy through county development plans and town maps, and structure and local plans.
- 1.3 Secondly, I would like to assess the intentions of Green Belt policy and how far these intentions have been met in practice. This will take us into related areas of the extent of departures from Green Belt policy and how they are justified both as part of the plan making process and as part of the development control process through appeals and inquiries.
- 1.4 Thirdly, the paper looks at the costs and benefits of Green Belt policy particularly in an era which is placing increasing weight on sustainable patterns of development. For instance, it seems to me that Green Belt policy born as a response to notions of city containment and relief of congestion which may be seen as early forerunners to more recent notions of sustainability, may in fact be viewed as leading to patterns of development and resultant long journeys to work which are inherently unsustainable.

This is one particular cost which has been imposed as a result of Green Belt policy. However, there are others and the effect on the rural economy and the provision of affordable housing are two particular aspects of Green Belt policies which I intend to specifically examine.

2.0 THE EVOLUTION OF GREEN BELT POLICY

- 2.1 Whilst the idea of a Green Belt around London goes back to Tudor times the true inventor of the Green Belt in modern planning theory was, of course, Ebenezer Howard. However, his concept was somewhat different to that which we all now apply. Howard's 'The Three Magnets' are famous as an exposition of the basic dilemma of town and country planning: how to maximise accessibility to opportunities (represented by "the town" with its high wages, foul air and chasing out of nature) as well as maximising environmental quality (represented by "the country" with its rural decline and beauty of nature). Howard's solution¹ was, of course, a new settlement in the form of a garden city which would seek to maximise both accessibility to opportunities and environmental quality simultaneously. At first sight, this seemed impracticable but Howard argued that if a corporation (note the emphasis on private sector initiative) takes land of low accessibility (i.e. where lack of competition makes the land cheap to buy) and then confers accessibility upon it by building a new garden city, the values thus created can be ploughed back into the town to maximise environmental quality. At the point where this process might lead to the development of the old vicious circle that affects existing towns, the corporation creates further accessibility somewhere else in the form of another garden city in order to avoid it.
- 2.2 This is a very important point indeed; it is contained in the final chapter of Howard's book, which has been too little read or understood by later commentators. As Professor Peter Hall says in his book "The Containment of Urban England":

¹ Ebenezer Howard, "Tomorrow: A Peaceful Path to Real Reform" first published in 1898 and subsequently in 1901 under the better known title "Garden Cities of Tomorrow".

"Most people have understood that Howard preached the virtues of containment of cities in order to avoid the problems of congestion. This is true; but it is only a part of what Howard advocated. Central to his hypothesis in the concept, contained in his final chapter, of the social city; a city which multiplies indefinitely, in a cell-like way, in order to distribute accessibility evenly and so prevent the imposition of the costs of accessibility."

The social city of Howard's diagrams ranged in size from 30,000 to 60,000 people separated from its neighbour by a Green Belt of open countryside of perhaps only 2 miles width, the Green Belt simultaneously restricting the growth of any one urban unit at the same time as providing the countryside with a ready urban market close at hand. Consequently as Professor Peter Hall observes, Howard's Green Belt was very different from the concept as it is now popularly used.

2.3 Howard was writing at the turn of the century when the growth of Victorian England still had momentum. The subsequent development of pre World War II planning ideas in the 1930s came at a time of economic stagnation and strategic concern over the vulnerability of large cities. As a result Howard's ideas suffered a subtle yet profound transmogrification. Instead of being essentially a recipe for flexible planning, as their originator intended, they were turned progressively into a fixed blueprint for the future as evidenced by Patrick Abercrombie's standard text book of the inter war years entitled "Town and Country Planning" published in 1933 and the promotion of the London Green Belt Act of 1938.

2.4 The idea of the containment of cities and the decentralization of population and employment was given added impetus by the Barlow Reports on the Geographical Distribution of the Industrial Population published in 1940 and, of course, the publication of Abercrombie's Greater London Plan in 1944. Abercrombie's Green Belt was different from anything previously proposed: it was neither a narrow green girdle nor continuous open countryside but a wide Green Belt or cordon sanitaire of about 10 miles width separating the threatened countryside and the threatening town. In this way Abercrombie gained the support of the socialist orientated Town and

Country Planning Association and the Conservative minded Council for the Preservation of Rural England. As the American commentator Donald Foley has said²:

"While the Green Belt concept had the support of those seeking outdoor recreational opportunities for London residents.....the scales may well have been tipped by the sympathetic advocacy of a conservative class which has traditionally respected a country gentleman, landed-estate pattern of living combined with an elite responsibility for guardianship of the English countryside."

2.5 Abercrombies' Green Belt was implemented in a slightly modified form by the new planning authorities around London after 1947 but no progress was made on Green Belts around other large urban areas until the publication of the famous Ministry of Housing and Local Government Circular 42/55 which recommended planning authorities to consider establishing a Green Belt:

- "(a) to check the further growth of a large built up area;**
- (b) to prevent neighbouring towns from merging into one another; or**
- (c) to preserve the special character of a town."**

This advice was followed by a further Circular 50/57 on Green Belt boundaries and in 1962 the Ministry published an explanatory booklet on the Green Belt.

2.6 During the late 1950s and early 1960s the local planning authorities brought forward their proposals for Green Belts through the medium of the first County Development Plans and associated or freestanding Town Maps. At the same time and into the 1970s the idea of regional planning and regional plans gained acceptance especially

² D. Foley, "Idea and Influence: The Town and Country Planning Association" published in the Journal of the American Institute of Planners in 1962.

to deal with the distribution of the growing post war population boom and consequently the Green Belts put forward in the old style development plans were often approved on a partial or conditional basis (or sometimes completely rejected). Thus the Green Belt put forward for Oxford was approved in respect of its inner area which would check the growth of the historic city whilst the outer area was given only interim approval pending the preparation of the new style structure and local plans which would deal with the distribution of population and employment in the context of emerging regional plans. In South Hampshire this process led to the rejection of the proposed Green Belt around Southampton and Portsmouth since this area had been identified for major growth in the South East Study. Through the subsequent preparation of structure and local plans and the confirmation or otherwise of interim Green Belt the area of approved Green Belt in England rose from 1.7 million acres in 1979 to 4.5 million acres in 1986. This statistic was given by Nicholas Ridley in a Parliamentary Answer of 2nd April, 1987, which was no doubt aimed at bolstering his green credentials as he came under shot and shell (unfairly in my view) for his right wing pro development views as the construction industry boomed and the growth of official NIMBY groups like Sane Planning in the South East (SPISE) mushroomed.

- 2.7 Nicholas Ridley no doubt also had another purpose in mind. In 1984 his predecessor but one, Patrick Jenkins, had issued draft Circular X/84 which gave a hint to a more flexible approach to the Green Belt. There was an outcry over that summer which became something of a "cause Celebre". I well remember buying a very expensive copy of the Sunday Times in France and reading an article that clearly implied that the government were considering the wholesale abandonment of the Green Belt. Naturally, practical politics reasserted themselves and the final version of the Circular published as Circular 14/84 emphasised the lack of change in policy by actually annexing Circulars 42/55 and 50/57 to the new Circular and introduced the phrase that Green Belts were permanent and should be changed only in "exceptional circumstances". Circular 14/84 was, of course, eventually incorporated in Planning Policy Guidance Note 2 and it is to this Note, and its proposed recent draft revision, that I now turn to assess the intentions of Green Belt policy as presently conceived.

3.0 GREEN BELTS: CURRENT PURPOSES

3.1 By the time we come to PPG2 issued in 1988 we have come full circle in 90 years from Howard's flexible concept through to Abercrombies' Greater London and City of Birmingham Plans; the application and development of Green Belt policies through the old style and new style development plans; a brief attempt to introduce some flexibility along with the reforming and deregulatory zeal of the early/mid 1980s; to the enshrining of the concept of permanence in Circular 14/84 in response to conservationist pressure and the addition of two further functions as the Green Belt became a full fledged instrument of regional and local policy. These two new functions were "to safeguard the surrounding countryside from further encroachment" and "to assist in urban regeneration".

3.2 How far have these purposes been fulfilled in practice? What is myth and what is reality? Fortunately we have the benefit of the results of the recent research undertaken by Oxford Brookes University on behalf of the Department of the Environment on The Effectiveness of Green Belts to help us find some answers.

To check the Unrestricted Sprawl of Large Built Up Areas and To Prevent Neighbouring Towns from Merging into One Another

3.3 The Oxford Brookes research found no dissenters to the view that Green Belts are successfully being used to check unrestricted sprawl and prevent towns from merging. Alterations to boundaries in development plans had affected less than 0.3% of Green Belts in the area studied since 1985. Most planning approvals are for small scale changes which do not significantly affect the open rural appearance of Green Belts. Furthermore, the appeal system strongly upholds Green Belt policy although the chances of success vary with the type of development. For instance there is a 45% chance of success on appeal if the proposal involves the creation of B1 offices jobs;

35% if the proposal involves an industrial/warehousing proposal, house extension or recreation use; whilst large scale residential development only has a 5% chance of success. Clearly the invocation of "special circumstances" is easiest where there is a (national?) argument regarding employment need, a factor which is likely to become more important with the apparent flexibility being introduced in the February 1994 revised draft of PPG2 in respect of employment sites. Consequently, whilst the rate of growth of large built up areas has been significantly checked in that it has been slowed to a very slow pace, it has not been stopped altogether as witnessed for instance in West London where the Green Belt is particularly fragmented and where British Airways achieved their Prospect Park office headquarters scheme on open land as did the London Diocesan Fund with their residential appeal at Feltham. Other examples include the release of land through UDPs for both housing and employment purposes e.g. in Leeds.

- 3.4 As regards the separation of settlements, my experience has been that this function is assiduously protected in inverse proportion to the size of the gap between the settlements. The emotional and visual satisfaction of leaving one place and crossing open land before entering another place underlies a number of general anti-coalescence planning policies and this is heightened in a Green Belt context. Thus, the relatively narrow gap between Cheltenham and Gloucester has been successfully defended by the local authorities on appeal even when opposing roadside services which are clearly related to the needs of the A40 which runs through the gap; or residential and retail developments encompassed by the new Distributor Road on the south west side of Cheltenham.

To Safeguard the Surrounding Countryside from Further Encroachment

- 3.5 The Oxford Brookes research found that this new purpose included in 1988 had not added any new dimension to the already very firm restraint on development offered by Green Belts. In its present form this purpose does not provide a clear criterion for decision makers and current practice suggests that this function is merely seen as complementing normal countryside protection policies.

3.6 However, the draft revision to PPG2 does introduce, for the first time, a set of positive objectives for land use once areas are included in the Green Belt starting from references to access and sport and recreation in the existing PPG2. These positive objectives are defined as follows:

- "- to provide opportunities for access to the open countryside for the urban population;**
- to promote the use of land near urban areas for outdoor sport and recreation;**
- to retain attractive landscapes, and enhance landscapes, near to where people live;**
- to improve damaged and derelict land around towns;**
- to secure nature conservation interest; and,**
- to retain land for agricultural, forestry and related purposes."**

3.7 With a few notable exceptions such as in the Colne Valley Regional park, the positive objectives for the Green Belt have not been much in evidence. We are all familiar with the approach to the capital where the Green Belt is characterised by power lines (also applicable, quite famously, to Oxford); abandoned or operational gravel workings; landfill sites; marginal agriculture or "horsiculture", and small clusters of housing or marginal employment uses such as haulage contractors, firewood and Christmas tree sellers surrounded by poor environments often seriously affected by roads or airports including Heathrow.

3.8 It appears that the government is gradually changing its view as to the importance of environmental improvement to the Green Belt since at one breath in the existing and revised draft PPG2 they say that development should not be allowed merely because the land has become derelict (and consequently resisting invitations to dereliction) whilst at the same time exhorting in the draft revisions to PPG2 the need to improve damaged and derelict land and to have regard to the contribution which future

redevelopment might make to remedying urban fringe problems and producing attractive well landscaped urban edges. In my view a clear message is now coming forward from Stockley Park, the British Airways Prospect Park decision, Bluewater Park at Dartford, Bedfont Lakes near Heathrow and the RMC headquarters' decision that the remedying of dereliction/serious pollution and/or the visual enhancement of the Green Belt in a positive way will all contribute to "special circumstances" especially where employment growth is involved.

- 3.9 On the other hand, the positive use of the Green Belt for outdoor sport and recreation has been one of the positive objectives for the Green Belt ever since its creation; and building for sport and recreation have been acceptable within Green Belts. However, to be acceptable these buildings have to be small and unobtrusive and ancillary to an outdoor recreational use. It is clear from PPG17 Sport and Recreation that all seater major football league stadia are not acceptable in the Green Belt and appeal/called-in inquiry decisions have demonstrated that even non major league stadia for Southend United F.C. or, more recently, lowly Solihull F.C. are unacceptable in the Green Belt. Having had the unusual experience of being actively supported by local residents in the promotion of major residential development on historic inner area football sites such as Stamford Bridge and Craven Cottage; the contribution these sites can make to meeting metropolitan housing targets; and the obvious advantages of a well designed and safe out-of-town location well related to public transport routes and the motorway system on the Italian model will, I believe, make central government embrace large scale recreational facilities in the Green Belt in a positive way in the same way that enabling development for positive environmental improvement is being embraced.

To Preserve the Special Character of Historic Towns

3.10 In the late 1950s York, Chester, Oxford and Cambridge, a group of compact small cities with special character subject to high development pressures, instigated Green Belt policies. Following the House of Commons Environment Select Committee inquiry in 1984, PPG2 added "historic" to the purpose thus making clear that new proposals around smaller settlements generally were not welcomed and frustrating attempts such as that by Avon County Council and Bristol City Council in 1987 to include the M32 Motorway Corridor in the Avon Green Belt on the grounds of "special character". Norfolk County Council failed in its attempt to establish a Green Belt around Norwich using the special character argument but in the last 15 years Green Belt coverage has been extended to areas such as Harrogate and Lancaster.

3.11 An analysis of Green Belt policies relating to historic towns suggests that it has a number of facets:

- . to protect the *green and open fabric* of such cities, keeping open extensive belts of land which form important parts of the setting of town centres, neighbourhoods or groups of buildings;
- . to protect *gateways*, by keeping open approaches to a city, and providing a clear *definition* of town and country;
- . to protect the wider *setting* of a city, a reference to *setting* being introduced for the first time in the revised draft PPG2. This may comprise, as in the case of Oxford, keeping open areas of higher ground and floodplains which provide a green background to the City and help give it a distinctive character;
- . to seek control over the size of a city, with a view to influencing the *level of activity* which requires to be accommodated in its historic core, thus protecting the character.

3.12 The strength of the historic towns' Green Belt policy has, of course, been very recently tested in respect of Chester through the Cheshire Replacement Structure Plan where the County and District Councils' proposed major Green Belt releases which were recommended to be reduced by the Examination-in-Public Panel and expunged by the Secretary of State. The Chester proposals were as follows:

	<u>Structure Plan</u>	<u>E.I.P. Panel</u>	<u>Secretary of State approved</u>
New Employment Land	210 ha	150 ha	100 ha
Dwellings	7,800	7,100	6,100
Land from Green Belt	320 ha	100 ha	None

In rejecting the proposals around Chester the Secretary of State took the view that, with present information, it was doubtful whether releasing more land could be accomplished without damaging the historic centre, or harming the character of Chester as a whole. The Secretary of State identified the following roles for the Chester Green Belt:

- ". **The Green Belt of North Cheshire and the Wirral has played an important role in supporting urban regeneration in Greater Manchester and Merseyside.**
- . **Chester's Green Belt has an important role in maintaining the separation of settlements.....especially between Chester and Ellesmere Port.**
- . **.....and or preventing the spread of development into open countryside.**

The Chester Green Belt has an additional function of safeguarding the historic city, both its setting as a whole and its special character, particularly that of its central core."

3.13 The basic problem is that many of the links in the arguments being made were not conclusively supported by evidence. It proved difficult to make irrefutable links between the scale and rate of peripheral development proposed, and its impact on the historic core of the City. How far the concept of 'environmental capacity', introduced by the Council for the Protection of Rural England and English Heritage, could be translated into an operable decision-making structure, was also unclear. The likely impact of traffic management measures proposed by the local authorities was not sufficient to convince those vetting the Plan that the precautionary principle should not prevail. Further work on what constitutes the special character of the City, and its ability to absorb growth, was recommended by the Panel.

3.14 The role of the Green Belt in protecting the character and identity of historic towns, by maintaining important green wedges and open land providing clear definition between town and country, has a well-established pedigree. Green Belt boundaries around historic cities are particularly tight and future development requirements have been assessed conservatively. It is less clear how far peripheral restraint is necessarily linked to the more effective conservation of their historic core areas. In the case of Oxford, for example, despite more than firm Green Belt restraints there has been considerable growth in retail and office floorspace over the past fifteen years. The level of vehicle penetration to the historic core has however remained similar for twenty years despite more than a 30 percent increase in car ownership nationally. This has been achieved by a traffic restraint policy and the introduction of a Park and Ride system. Peripheral restraint has acted as a backcloth to these more interventionist transport measures.

To Assist in Urban Regeneration

3.15 The fifth and final function of Green Belts - to assist in urban regeneration - was only added in 1988. It may be thought that it is too early therefore to assess the

effectiveness of this function or, alternatively, and one suspects that this is certainly in the public's mind, that this function merely reinforces the general no growth stance of Green Belts; the policy of urban containment and attempts to redirect growth back into the inner areas of cities. However, although no studies have been carried out to test the hypothesis that firm containment has specific effects in assisting regeneration, the Oxford Brookes research reveals a general acceptance that denying a range of peripheral site development options will not secure the regeneration of underused urban sites and that specific policies to encourage the re-use of urban land are of more importance. The denial of development opportunities at the urban fringe is more likely to lead to the development of sites with similar attributes in other parts of the outer city. This may involve leap-frogging beyond the Green Belt or development by intensification of uses in towns inset within the Green Belt.

- 3.16 As a result, many Metropolitan Green Belt authorities have actually released peripheral Green Belt sites for employment uses as a way of regenerating their economies and areas in the widest sense. In the West Midlands the Premium Industrial Sites policy led, first of all, to the release from the Green Belt of Arlington's Birmingham Business Park after a called-in inquiry in 1985 and, more recently, the release from the Green Belt of the Blythe Valley Business Park which was proposed in the Solihull Unitary Development Plan and tested against competitor proposals at a called-in inquiry. In South and West Yorkshire the Regional Guidance suggests that the preparation of Unitary Development Plans provides the opportunity, exceptionally, to review existing boundaries where economic regeneration may be constrained by the lack of suitable sites. As a result both Barnsley and Wakefield Districts have suggested the allocation of large sites adjacent to motorways for prime industrial use and land for a new freight terminal was released in Wakefield in 1992. In Leeds, major releases of approved and interim Green Belt land at Parlington and Austhorpe are proposed for business parks whilst the Newcastle on Tyne UDP proposes major releases to the north of the city to cater for economic development up to 2006. Outside England, Strathclyde Regional Council proposed the release of some twenty Green Belt releases for housing in 1990 as the easier brownfield sites had been developed and these were accepted by the Scottish Office in its approval of the Structure Plan in 1992.

4.0 THE BENEFITS AND COSTS OF GREEN BELT POLICY

- 4.1 As we have seen, the Green Belt is probably the clearest, simplest and most consistently applied planning policy (relatively speaking!) and in this respect is one of the most durable and best established planning icons. The Department of the Environment pays particular attention to Green Belt policies in its scrutiny of development plans to ensure consistency of approach and local authorities are not allowed to make their own variations outside national guidelines. A particular recent example was the attempt by Cheltenham Borough Council to include Park and Ride sites as an acceptable Green Belt use in their District Plan. This was resisted by the Department but guidance is now given on Park and Ride sites in the draft revision to PPG2.
- 4.2 Analysis of the purposes of the Green Belt shows that they are being successfully achieved. The growth of large urban areas has been radically slowed although not stopped altogether: gaps between settlements have been protected especially through the appeal process although careful working through the development plan system may still unlock sites; the surrounding countryside has consequently been protected from encroachment and there are indications that the positive enhancement of the countryside may, in certain circumstances, allow associated development proposals to proceed: development which may affect the special character of historic towns has been resisted as the Chester case demonstrates but this may be to the long term detriment of the health of such cities; and the assistance to regeneration has been interpreted and applied flexibly to the extent that this purpose has underpinned the release of peripheral urban sites for employment.
- 4.3 The relative clarity and consistency of Green Belt policy is one of its strengths and why it continues to be protected and applied. The concept is valued by the public since they see it as highly restrictive giving protection to private amenity and property values often in highly favourable locations close to job and facilities in a nearby town or metropolitan area which would otherwise be engulfed in a sea of concrete. Developers understand that a Green Belt site is inherently difficult whilst planning officers and politicians like the clarity and strength of the policy. Indeed, when asked

why the County Council wished to reinstate the old South Hampshire Green Belt proposal instead of ordinary countryside policies at the Hampshire County Structure Plan Review Examination-in-Public in November 1991, the Assistant County Planning Officer replied that "it would give the clearest message to developers to go away".

4.4 The public/political agenda is probably impossible to change as Patrick Jenkins found out in 1984 when he intimated a slackening of the rigidity of Green Belt policy. This, and other moves, undoubtedly encouraged Consortium Developments Ltd. to promote their first new settlement site at Tillingham Hall in the Green Belt in Essex on the basis of arguments which in essence reflected the flexible concept of Ebenezer Howard nearly a hundred years before but which have subsequently become lost by the more rigid application of Green Belt policy. However, by the time the inevitable eight week inquiry occurred, the straws in the wind had definitely been blown away by the combined effect of the local councils and their electorate, the C.P.R.E., the London Green Belt Society and others and the permanence of the Green Belt had been reasserted by Circular 14/84 which emphasised continuity with past policy.

4.5 Although the benefits are clear, the costs of Green Belt policy are equally tangible. First and foremost, the containment of urban areas by Green Belts of up to 12/15 miles in width in the case of Greater London and the consequent separation of home and workplace are, it seems to me, radically at odds with evolving concepts of sustainability and the minimisation of the need to travel. The Oxford Brookes research concludes:

"If Green Belt boundaries are too tight, in the absence of urban infill new development will be pushed beyond them. If Green Belts are too wide the distance between activities will be unnecessarily increased. The result will be wasteful extra journeys, often by private car. Given these problems, well-contained urban peripheral developments and, occasionally, free-standing settlements along public transport corridors within and beyond city fringes, may be the preferred 'models'. If principles of sustainability are to be given greater importance in the future then the re-drawing of the inner boundaries of some Green Belts may be necessary. These principles will need to extend to the definition of white land."

Certainly, the effect of Green Belts is to impose longer journeys to work and journeys for other purposes even when allied with a policy of decentralisation of jobs and homes whether in Oxfordshire through the mechanism of the County Towns policy diverting development to Witney, Banbury, Bicester and Didcot or through the more formal mechanism of the London overspill policy of the 1950s and 1960s.

- 4.6 The current response of local authorities is different. In Leeds, for instance, a release of 250 acres from the (largely) interim Green Belt at Austhorpe in East Leeds for 100 acres of housing; 100 acres of employment; 50 acres of open space; on a railway line with a proposed new station; and well related to existing and new investment in trunk roads seems a very sustainable way to treat the Green Belt. Solihull MBC has taken a different approach and prefers to avoid adding to the peripheral growth of the conurbation by the creation of a new freestanding settlement at Dickens Heath in the interim Green Belt but well related to road and rail connections to the nearby conurbation where there are most jobs and facilities. This approach is also being taken around York where there are a number of new settlement proposals seeking to meet the city's housing and employment needs.
- 4.7 In my view if the Green Belt concept is to respond flexibly to the new concerns of Planning Policy Guidance Note as discussed by Professor Hills, more attention will need to be paid to ensure that desirable land use options are not closed off by notions of "permanence" and by premature confirmation of interim Green Belt areas which are likely to be reviewed or rolled back. The draft revision to PPG2 indicates in paragraph 2.12 that the safeguarding of land for longer needs should take account of a twenty year time horizon which is effectively the life span of only two development plan reviews. The need for flexibility against a public desire for permanence and inflexibility in the application of Green Belt policy is well demonstrated by Gloucestershire County Council's current consideration of long term development options up to 2011 which canvass the possibility of a major new settlement in the Green Belt between Cheltenham and Gloucester in order to maximise sustainability criteria.

- 4.8 The corollary of long journeys to work is, of course, that people have had to look beyond the Green Belt to meet their housing needs both because of the physical restrictions on supply and the resultant high cost of housing in Green Belt areas, a proposition only recently reconfirmed by Gerald Eve's research for the Department of the Environment which included, inter alia, case studies in Green Belt areas like Woking. Whilst it is accepted that households trade off accessibility with housing costs, the market is clearly distorted by an area of highly constrained supply immediately adjacent to our major urban areas.
- 4.9 The general shortage of housing in Green Belt areas and high general house prices exacerbate the need for affordable housing which RICS research has estimated to be in excess of 100,000 units per annum throughout the country. However, in those areas such as the Green Belt where the need for affordable housing is arguably the greatest, the planning system fails to help. PPG3 'Housing' makes it clear that the provision of affordable housing does not alter the general presumption against inappropriate development in the Green Belt and that affordable housing policies should generally be targeted at the "generality of rural areas" rather than Green Belt. Even the "exceptions policy" is not generally encouraged within Green Belts and even then only within settlements and against the background of the objectives of Green Belt policy and the evidence of local need. The alternative source of affordable housing to the "exceptions policy" is of course, the negotiation of a quota from the private development of usually very large sites. However, large site allocations in Green Belt towns are rare events indeed after 40 years of infilling and rounding-off.
- 4.10 Meeting economic needs in Green Belt areas suffers from the same discrimination as housing needs. In the 1960s and 1970s most development plans had "local needs" policies which restricted employment growth often to artificial floorspace ceilings especially if a local need could not be demonstrated. Most freestanding towns in the Metropolitan Green Belt had such policies and the battles over, for instance, the Windsor and Maidenhead Office Policy kept us all busy especially as it was continually being rewritten as the quota became exhausted or another appeal confirmed or undermined the policy on a seemingly capricious basis. Luckily these

sort of policies are now less common and there is more flexibility and less artificially derived criteria to be met. The taking of open Green Belt land, however, remains extremely difficult even if special circumstances point to national need and economic and environmental gains.

- 4.11 Finally, the diversification of the rural economy in the Green Belt has been particularly disadvantaged by Green Belt policies since the present PPG2, as interpreted by the Courts, contained more stringent tests requiring buildings to be redundant before alternative uses are acceptable compared with the normal countryside criteria as set out in PPG7 although this difference is being rectified in the draft revision to PPG2. The revision to PPG2 also provides a more flexible approach to the development and redevelopment of employment sites in the Green Belt.

5.0 CONCLUSIONS

- 5.1 In my opinion the Green Belt is probably the best established and most successfully implemented icon of British town planning. It has a long history of development both in theory and practice. It has clear public benefits which are well respected and continue to be embraced as a way of giving structure to the growth of our urban areas. It has, however, major costs in terms of the meeting of housing and employment needs since 14% of the potentially most dynamic parts of the country are being constrained from making their proper contribution. Furthermore, the inevitable separation of activities that occurs imposes clear costs which will be confirmed by any commuter into either Oxford or London.
- 5.2 Nevertheless, Green Belt policy is unlikely to be abandoned because of its private benefits and its clarity as an instrument of policy. The impact of sustainability may, however, lead to some fundamental reappraisal of the form of the Green Belt. For instance, "finger growth" along public and private transport routes as advocated by the former South East Economic Planning Council may be seen as a more sustainable form of development than "decanting" people and jobs beyond the Green Belt. The concept was born out of notions of containment; it may be notions of sustainability that lead to its decline.