

Policy Statement

Author(s): Mathew Frith
Date: July 2007, 2012, rev May 2019
Owner: Conservation
Review Date: January 2021

Dean Bradley House
52 Horseferry Road
London
SW1P 2AF
Tel: 020 7261 0447
Fax: 020 7633 0811
enquiries@wildlondon.org.uk
www.wildlondon.org.uk



LONDON'S GREEN BELT

London's Green Belt is integral to the vision of London as a sustainable, green city based on the concept of a strategic network of green spaces. It provides both a buffer and a link between suburban London and the wider countryside, helping to prevent further urban sprawl. It, along with Metropolitan Open Land, also serves to support ecological networks and significant green corridors for wildlife, offering people the chance to enjoy the countryside on London's doorstep. Nevertheless, the quality of land within the Green Belt is variable, and demands for development continue to place pressure upon it.

Whilst for many the Green Belt is perceived to be a success of the planning system, to others it places undue pressures on meeting housing need within London. Consequently there is much confusion as to its purpose and there are regular calls for changes to Green Belt policy and protection to make it fit for purpose in the 21st century. The National Planning Policy Framework and London Plan retain a strong emphasis on protecting the green belt but it is arguably weaker in some aspects than previous planning policy. Nevertheless, a natural capital approach offers new approaches to its design, use and management.

I. Policy

- London Wildlife Trust supports the principles, purposes and objectives of the Green Belt and values the benefits it brings to Londoners through its contribution to the conservation of London's biodiversity, geomorphology, landscape heritage, environmental quality and climate change resilience.
- We value and will vigorously defend the role of London's Green Belt in sustaining biodiversity and providing access to nature, through the provision of land designated for nature conservation, nature reserves, and other uses but managed with wildlife in mind.
- We will oppose inappropriate use, development, damage or loss of Green Belt and where there will be adverse impact on biodiversity or access to nature, or uses that are inconsistent with Green Belt land designation.
- We will encourage local authorities to use their existing powers and to be proactive in protecting and conserving biodiversity and the ecological resilience of London's Green Belt.
- The Trust will implement best practice in the conservation of biodiversity and provision of access to nature through the management of its landholdings in the Green Belt.
- We will seek to identify opportunities (including the promotion of grants and other incentives) to encourage other land managers to incorporate enhancements and to adopt best practice for biodiversity conservation and access to nature within the management of their Green Belt land.
- We will support local, regional or UK government policies and legislation where these serve to protect and manage the Green Belt and the strategic role it plays in conserving London's natural heritage.
- We will oppose legislation and local, regional and national government policies where these will serve to weaken the support provided to biodiversity conservation or access to nature in the Green Belt.
- We will work with the Mayor, local authorities, and other stakeholders to identify opportunities to enhance and promote the sustainable use, design and management of the Green Belt, and strengthen its strategic role in protecting biodiversity and ecosystem services.

Protecting **London's wildlife** for the future

The London Wildlife Trust is a company limited by guarantee registered in England and Wales no. 1600379 and registered charity no. 283895.

- We support strategic open space initiatives such as the Wildlife Trusts' Living Landscapes vision, the All London Green Grid, regional parks, and potential Nature Recovery Networks, that may further conserve London's biodiversity, and strengthen the Green Belt network.
- We will contribute towards any strategic review of the Green Belt's future, in order to protect and secure benefits for wildlife and Londoners' access to nature.

The Trust will review this policy and amend it following any changes to legislation or planning guidance, as appropriate.

2. Context

Purpose and definition

First established in 1947, the Green Belt's key character is its 'open-ness'; any new development within it should not compromise this 'open character'. As such it aims to protect land from urban sprawl and keep conurbations and settlements distinct from each other. National planning policy sets out five purposes of Green belt, which are to:

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

See Addendum 1 for further details.

In recent years the definition within the public sphere appears increasingly confused, through the terminology of brownfield and greenfield sites, the latter often used interchangeably with Green Belt. The Green Belt contains both previously developed land ('brownfield'), undeveloped ('greenfield') land and some buildings (e.g. agricultural barns) that 'serve' the function of the Green Belt. A greenfield site is not necessarily designated as Green Belt, and brownfields within Green Belt are afforded the same protection under Green Belt policy as greenfield sites within Green Belt, despite the current emphasis to develop on brownfield sites.

Coverage and land use

Covering 513,860 hectares (2017, down from 528,080 ha in 2011), the Metropolitan Green Belt encircles and extends well beyond London with a mixture of farmland, woodland, country parks, golf-courses, cemeteries, nature reserves, reservoirs, and landfill sites. 22% of Greater London is designated as Green Belt with more than half found in just three boroughs; Bromley, Havering and Hillingdon at 7,730, 6,010 and 4,970 hectares respectively – see Addendum 2. More than half of the total area of Bromley and Havering is designated Green Belt.

Although most of London's Green Belt has never been built on (and is, by definition, greenfield) some brownfield land is found within it; this is primarily landfill and land used for mineral extraction, but also includes water treatment works, airfields and farmyards. As future land use intensifies and residential densities increase, the contribution of the Green Belt (and other green spaces) to biodiversity, amenity, quality of life, and the open character of London - on which London's sustained development depends - will become ever more important.

Protection

Only limited forms of development are permitted within Green Belt. Planning policy guidance for Green Belts is set out in the National Planning Policy Framework (NPPF, 2019) – see Addendum 3. The presumption in favour of sustainable development does not override policies protecting the Green Belt although there is a slight softening of the position on designating new Green Belts, particularly around new settlements if one is proposed. The NPPF also urges local planning authorities to plan positively for the Green Belt, to enhance it for, amongst other functions, '*landscapes, visual amenity and biodiversity.*'

The current London Plan (2016) states *'The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances.'* (Policy 7.16). The key will be how local authorities apply the policies, and what measures they take to either amend, expand or reduce Green Belt areas within their area. The New London Plan (currently in development¹) commits to a slightly stronger protective stance, under *Policy G2 London's Green Belt* (see Addendum 4). In addition, London Plan and local plan policy identifies Metropolitan Open Land ('inner London's Green Belt') as having an equal role and equal weight in planning decisions.

A network of wildlife sites is fundamental to the conservation of London's biodiversity. The Green Belt covers 35,109 ha in London (2018), and includes 95% of London's statutorily designated sites (e.g. SSSIs, LNRs), of which 13,604 ha is designated as Sites of Importance for Nature Conservation (SINC, c39%, 2017). A SINC may also be designated in full or part as a statutory site such as a SSSI, SPA, etc. Examples of important London wildlife sites within the Green Belt include Hainault Forest, Crayford Marshes, Sixty Acre Wood, Frays Farm Meadows, and Totteridge Fields. Green Belt status provides these sites with an added – arguably greater - level of protection from development.

The Green Belt also offers opportunities for landscape scale conservation, by providing buffer zones around and links between individual sites set within a wider green matrix. Additionally, these can provide the foci of strategic regional initiatives such as *'Darwin at Downe'* (Bromley), All London Green Grid (ALGG) Area Frameworks (e.g. London's Downlands, Epping Forest & Roding Valley), and the Colne Valley Park (Hillingdon and neighbouring counties) which all have great significance for biodiversity conservation in the Green Belt. The ALLG is currently being reviewed, but is likely to reference the role of the Green Belt in meeting its objectives.

Nevertheless, not all land within London's Green Belt is of high quality – for wildlife, landscape, or amenity. There are opportunities to enhance these elements of the Green Belt, or to re-designate parts that no longer meet its objectives - so long as there is no net loss of biodiversity.

There is a presumption that Green Belt is not subject to change. However, local planning authorities, as part of their development plan (Local Plan) process, can review whether existing Green Belt still meets designation criteria. Such protection has been withdrawn from some areas following neglect of and targeting by fly-tippers, or as a result of deliberate action by landowners who hope to be able to develop areas within the Green Belt (in conflict with the chief purpose for which it was designated).

The future

Recent changes to planning policy and legislation, together with comprehensive housing and planning reviews by Government, have highlighted some of the strengths and weaknesses of the Green Belt some 70 years since its inception. They also give some indication of Government philosophy in respect of its future; whatever this may be, the concept of the Green Belt has become strongly rooted in the public's heart and any major threats to it will undoubtedly be vigorously fought over. This was highlighted in the consultation responses to the revised NPPF and draft New London Plan in 2017-18.

However, the greatest dangers remain being the incremental losses and damage here and there. Since 2017 newly adopted Local Plans in two London boroughs (Croydon, Sutton) have resulted in a net loss of 110 hectares of Green Belt. Campaigners continue to remain vigilant on the abrasion of the quantity of Green Belt, and have advocated for more stringent application of policy. Recent studies suggest over 400 sites are now identified for housing in London's Green Belt.

The Metropolitan Green Belt – and Metropolitan Open Land - will become more important as London's climate is affected by the consequences of global warming; mitigating temperature extremes, helping to reduce flood risk and renew groundwater, and limiting the local extinction of isolated populations of wild

¹ The New London Plan is due to be adopted later in 2019.

plants and animals. The extension and strengthening of the network inwards towards London's centre will be essential to meet this challenge; the development of 'green infrastructure' can be underpinned in the suburbs by a strongly protected and well-managed Green Belt.

Nevertheless, London Wildlife Trust considers that a comprehensive review of the Green Belt in London is required if its problems and threats are to be addressed. With the challenges and opportunities posed by climate change, sustainable urban regeneration and concerns over people's quality of life, there is, more than ever, a need to return to the original principles, purposes and objectives for which the Green Belt was created, and reconfigure them for the 21st century.

3. Related Policies

National:

National Planning Policy Framework (2019)

www.gov.uk/government/publications/national-planning-policy-framework--2

London:

The London Plan (2016): Policy 7.16 – Green Belt

www.london.gov.uk/priorities/planning/londonplan

New London Plan showing minor suggested changes (2018): Policy G2: Green Belt

www.london.gov.uk/sites/default/files/draft_london_plan_-_showing_minor_suggested_changes_july_2018.pdf

London Wildlife Trust:

Brownfield Land (2009, 2012 revision)

4. References

CPRE (2018). *The State of the Green Belt*, CPRE.

CPRE London and Greenspace information for Greater London (2018). *London's Protected Land: the extent, location and character of designated Green Belt and Metropolitan Open Land in Greater London*, CPRE, London.

Green Arc Steering Group (2004). *Improving the countryside around London: The Green Arc Approach*. Land Use Consultants. www.greenarc.org/luc-report.html

Groundwork and Countryside Agency (2005), *The countryside in and around towns*, Groundwork.

Landscape Institute (2018). *Green Belt Policy*, Landscape Briefing, Landscape Institute.

London Green Belt Council (2017). *The accelerating loss of London's Green Belt – who is to blame?*, LGBC

Mace, A., Blanc, F., Gordon, I., & Scanlon, K. (2016). *A 21st Century Metropolitan Green Belt*, London School of Economics.

www.lse.ac.uk/geography-and-environment/research/green-belt/documents/Final-report-green-belt-1.pdf

Machin, N. (ed), (2004). *Planning for the wild; how to use the planning system to protect London's biodiversity*, London Wildlife Trust.

McNab, D. (2018). Time for a London biodiversity booster belt?, *Town & Country Planning*, May/June 2018, Town & Country Planning Association.

Mayor of London (2016). *The London Plan; The Spatial Development Strategy for London, Consolidated with Alterations since 2011*, Greater London Authority.

www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-2016-pdf

Ministry for Housing, Communities & Local Government (2018). *Local Planning Authority Green Belt: England 2017/18*, MHCLG.

Natural England, (2007). *Green Infrastructure and the Urban Fringe: Learning lessons from the Countryside In and Around Towns programme*, Natural England.

Natural England & CPRE (2010). *Green Belts; a Greener Future*, Natural England.
<http://publications.naturalengland.org.uk/publication/38005>

ODPM (2005), *The Town and Country Planning (Green Belt) Direction 2005*. ODPM Circular 11/2005.
assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7674/circularconsultationdirect.pdf

Papworth, T. (2015). *The Green Noose; An analysis of Green Belts and proposals for reform*, Adam Smith Institute.
www.adamsmith.org/research/the-green-noose

Town & Country Planning Association (2002), *TCPA Policy Statement - Green Belts*, TCPA.
www.tcpa.org.uk/policy_files/g-beltsPS.pdf

5. Links

CPRE Greenbelt Information: www.cpre.org.uk/campaigns/planning/green-belts

London Greenbelt Council: www.londongreenbeltcouncil.org.uk/

Town and Country Planning Association: tcpa.org.uk

6. FAQ

What is London's Green Belt for?

- London's Green Belt (the Metropolitan Green Belt) prevents uncontrolled suburban sprawl to safeguard the countryside;
- Whilst originally also to provide land for public amenity and conservation of landscape and natural heritage, London's Green Belt has become an important resource for biodiversity, publicly accessible countryside, as well as a place for recreational activities (e.g. golf, equestrian sports), and specialist agriculture (e.g. pick-your-own).

What are the threats to Green Belt land and its biodiversity?

- Inappropriate management that can lead to damage to biodiversity and amenity, and in extreme cases, blight;
- Development proposals in accordance with Green Belt policy but where these can conflict with other objectives, for example conservation of biodiversity and natural heritage (e.g. intensively managed cemetery, equestrian and sports facilities, mineral extraction, forestry, landfill);
- Hope value – land held on by owners (land-banking) in the hope that they may eventually develop it; this is often under-managed, closed to access, and can be deliberately blighted;
- Pressure from developers, leading to land taken out of the Green Belt in planning reviews.

Does the Trust oppose all development within the Green Belt?

- The Trust does not support any inappropriate development within London's Green Belt; if any demonstrate significant adverse impacts on biodiversity and natural environment, the Trust shall oppose them as resources permit;
- We may oppose developments in accordance with Green Belt policy if they are shown to have significant adverse impacts upon biodiversity and the natural environment. Each case will be addressed on an individual basis.

There are development proposals for Green Belt land in my borough – what can I do about these?

- Contact your local planning department, the Green Belt Council, London Wildlife Trust, and Planning Aid for London. We may be able to provide support if the proposals have significant impacts upon biodiversity.

Some brownfield sites are more important for wildlife than land in the Green Belt. What is the Trust's position?

- The Trust endeavours to oppose any development on any site of high biodiversity value no matter where it is located, its history, or designation, wherever that value will be damaged or destroyed. Each site will be addressed on an individual basis, although its strategic role will always be a consideration.
- See the London Wildlife Trust's Brownfield land policy.

Addendum I: Green Belt history

The idea of a green belt for London was first proposed in the 17th Century by Sir William Petty. His proposal for a Green Belt two miles from the centre of London was succeeded in 1910 by Dame Henrietta Barnett's suggested belt five miles out of London (such had been the subsequent growth of London). Neither proposal gained the necessary support but the first official scheme "to provide a reserve supply of public open spaces and of recreational areas and to establish a green belt or girdle of open space" in 1935 by the Greater London Regional Planning Committee led to the Green Belt Act of 1938, which envisaged a 'green ribbon' around the Capital.

Sir Patrick Abercrombie's Greater London Plan of 1944 enlarged on this with the concept of four concentric green belt rings, with the green ribbon forming the Green Belt Ring around the Inner Urban and Suburban Rings, and reaching out to an Outer Country Ring. London's Green Belt was established by the Town and Country Planning Act of 1947 - and made more secure by the 1968 Amendment.

In 1955 a national Green Belt policy was established with the Ministry of Housing and Local Government urging all local authorities to protect any land acquired around their towns "by the formal designation of clearly defined Green Belts". Green Belt Circular 42/55 set out the aims of the new policy as "checking the unrestricted sprawl of the built-up areas, and of safeguarding the surrounding countryside against further encroachment", rather than to provide land for the nutritional and recreational needs of cities.

At over 520,000 ha the Metropolitan Green Belt is the most extensive and the oldest of the 14 individual Green Belt areas which cover some 13% of the country.

Under the National Planning Policy Framework (2019), Green Belt exists for five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from 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.

Earlier national policy under PPG2 (1995, amended 2001) also specifically identified these to additionally serve six objectives:

- to provide opportunities for access to the open countryside for the urban population;
- to provide opportunities for outdoor sport and outdoor recreation near urban areas;
- 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 in agricultural, forestry and related uses

These are no longer implicitly referenced in current national planning policy.

Although central government has consistently given support to the Green Belt concept, Government actions in relation to development within the Green Belt has all too frequently been contrary to its designation and Government proposals for greatly increased numbers of new dwellings in the South East and East of England in particular has increased pressures on Green Belt land, including in London.

The Barker Report

The 2006 Barker Report on planning called for Green Belt boundaries to be reviewed across England. It noted that "The success of green belts and other policies has been notable, and has produced a number of important benefits, including maintaining valued open space for recreation and preserving the intrinsic character of the English countryside." and stated that over the last two decades it has been instrumental in driving environmental regeneration. One of the key findings of the report is that steps should be taken to improve the quality of Green Belt land, and to ensure that valued green space in urban areas is protected and enhanced.

However, with the statement that steps be taken to ensure that: "new development beyond towns and cities occurs in the most sustainable way, by encouraging planning bodies to review their green belt boundaries and take a more positive approach to applications that will enhance the quality of their green belts" Barker proposes that parts of existing Green Belt areas be sacrificed in order to bring improvements to others.

In a survey for the report, members of the public were asked to comment on which classes of land, ranging from those valuable for nature, landscape, high value farmland, or land at the edge of cities and towns should be protected. Unsurprisingly, only 14% thought it was important to protect the latter. The report contrasts these findings with the 2005 MORI poll on behalf of the then Council for the Protection of Rural England - in which 60% were in favour of Green Belt - suggesting that the difference reflects the a widespread misconception that Green Belt is a conservation designation.

However, a truer picture of the public's views might well have been gained by asking what value respondents placed on the five purposes and the six objectives for which Green Belt was established. The fact that 73% of respondents indicated that land designated as Areas of Outstanding Natural Beauty, National Parks or Sites of Special Scientific Interest are most worthy of protection, indicates the high value placed on wildlife. Considerable areas have been lost over the last half century despite this 'protection', and SSSIs within the Green Belt, despite being closer to a far greater number of people, have probably been better protected than those in more rural areas. The report goes on to comment on the on pressures for new housing and office space, problems with commuters 'jumping the green belt' and the alternatives offered by open space initiatives such as Green Wedges developed in other countries.

More recently there have been growing calls for a rethink of Green Belt policy, for example to allow for development within it in proximity to transport nodes, such as those studies published by the Adam Smith Institute (2015) and the London School of Economics (2016). These have been met with counter proposals by the most ardent of the protectors of the Green Belt, the Campaign to Protect Rural England (CPRE).

Addendum 2: London local authority Green Belt coverage, 2017

Borough	2011 (ha)*	2017 (ha)*
Barking & Dagenham	530	530
Barnet	2380	2380
Bexley	1120	1120
Bromley	7730	7730
Croydon	2310	2310
Ealing	330	310
Enfield	3090	3060
Haringey	60	60
Harrow	1090	1,090
Havering	6010	6010
Hillingdon	4970	4,970
Hounslow	1220	1,230
Kingston Upon Thames	640	640
Newham	80	80
Redbridge	2060	2060
Richmond Upon Thames	140	140
Sutton	620	620
Waltham Forest	840	840

* Figures supplied by MHDCLG

Addendum 3: National Green Belt policy

National Planning Policy Framework (2019) – para numbers as original

13. Protecting Green Belt land

133. 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.
134. Green Belt serves five 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;
 - 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.
135. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Any proposals for new Green Belts should be set out in strategic policies, which should:
- a) demonstrate why normal planning and development management policies would not be adequate;
 - b) set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
 - c) show what the consequences of the proposal would be for sustainable development;
 - d) demonstrate the necessity for the Green Belt and its consistency with strategic policies for adjoining areas; and
 - e) show how the Green Belt would meet the other objectives of the Framework.
136. Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.
137. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:
- a) makes as much use as possible of suitable brownfield sites and underutilised land;
 - b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
 - c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.
138. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable patterns 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.
139. When defining Green Belt boundaries, plans should:
- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
 - b) not include land which it is unnecessary to keep permanently open;

- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
 - e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
 - f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- I40. If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.
- I41. 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.
- I42. The National Forest and Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife. The National Forest Strategy and an approved Community Forest Plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within the National Forest and Community Forests in the Green Belt should be subject to the normal policies for controlling development in Green Belts.

Proposals affecting the Green Belt

- I43. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- I44. 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.
- I45. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:
- a) buildings for agriculture and forestry;
 - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
 - c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
 - e) limited infilling in villages;
 - f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
 - g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.
- I46. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:
- a) mineral extraction;
 - b) engineering operations;
 - c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;
 - d) the re-use of buildings provided that the buildings are of permanent and substantial construction;

- e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and
- f) development brought forward under a Community Right to Build Order or Neighbourhood Development Order.

147. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

Addendum 4: London Plan Green Belt policy

New London Plan showing minor suggested changes (2018): *Policy G2: Green Belt* – para numbers as original

A The Green Belt should be protected from inappropriate development:

- 1) development proposals that would harm the Green Belt should be refused*
- 2) the enhancement of the Green Belt to provide appropriate multi-functional uses for Londoners should be supported.*

B The extension of the Green Belt will be supported, where appropriate. Its de-designation will not be supported.

8.2.1 The Mayor strongly supports the continued protection of London's Green Belt. The NPPF provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries. London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for recreation. It also provides the vital function of containing the further expansion of built development. This has helped to drive the re-use and intensification of London's previously developed brownfield land to ensure London makes efficient use of its land and infrastructure, and that inner urban areas benefit from regeneration and investment.

8.2.2 Openness and permanence are essential characteristics of the Green Belt, but despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and climate resilience. The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt.