

## **GREEN BELT UNDER SIEGE: the NPPF three years on A CPRE analysis**

**27 March 2015**

Green Belt is one of our most valued planning tools, and yet it is under a level of threat unprecedented in recent times. Over 200,000 houses are proposed to be built on Green Belt land. Recent reports by think tanks and developers have called for releases to accommodate many more. Ministers have taken action to address some of the most unnecessary proposals, but further changes in policy are needed by the next Government to direct development to suitable brownfield sites and avoid unnecessary releases of Green Belt land.

### **Introduction**

Green Belts cover 12.4% of England, mostly open land and countryside around the largest or most historic towns and cities. The designation was established in 1955 primarily to stop urban sprawl and protect the setting of historic towns and cities. International comparisons suggest that without the strong protection the designation offers against most forms of development, the countryside around these towns and cities would long since have been lost<sup>1</sup>.

The National Planning Policy Framework (NPPF, March 2012) and the 2010 Coalition Agreement stated clearly that the Government attached great importance to the Green Belt and that it will seek to maintain existing levels of protection.

The Prime Minister recently asserted that the preservation of Green Belt is ‘paramount’, and that development on Green Belt was at its lowest rate for 25 years<sup>2</sup>. CPRE’s analysis shows this claim to be misleading. The Lyons Review of Housing<sup>3</sup>, commissioned by the Labour Party and published in 2014, highlighted that Green Belt policy had been highly effective in preventing urban sprawl, but called for local authorities to use the existing flexibility in the policy to review local boundaries. Communities Secretary, Eric Pickles, has made similar calls but has also issued a number of statements<sup>4</sup>, calling on local authorities to protect Green Belt land and prioritise brownfield development. This has recently been backed up by action to halt proposals in Coventry and County Durham that CPRE has highlighted as particularly damaging and unnecessary<sup>5</sup>.

### **Current reality**

CPRE local groups have analysed draft and adopted Local Plans covering areas of Green Belt in England. We have compared the results with previous CPRE analyses in August 2013 and in August 2012. Despite cross-party political support for the

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<sup>1</sup> See CPRE, *Green Belts: a greener future*, February 2010.

<sup>2</sup> Speech in Essex, reported at [www.telegraph.co.uk](http://www.telegraph.co.uk) on 2 March 2015.

<sup>3</sup> Available from <http://www.yourbritain.org.uk/>.

<sup>4</sup> Most recently in October 2014: see <https://www.gov.uk/government/news/councils-must-protect-our-precious-green-belt-land>.

<sup>5</sup> Called in planning decision on Coventry Gateway dated 12 February 2015; Inspector’s interim views on the submitted County Durham Plan, dated 18 February 2015.

Green Belt, our analysis has found growing pressure across the country to use it for housing:

**March 2015 - 219,535 houses proposed plus 1,205 ha industrial development.**  
**August 2013 - 158,424 houses proposed plus 1,448 ha industrial development.**  
**August 2012 - 81,275 houses proposed plus 1,000 ha industrial development.**

The figures show that three city or county regions - London, Oxfordshire and Nottinghamshire - as well as the wider South West region are facing an increasingly large number of houses on Green Belt land (see map with numbers on page 4). There is particularly serious pressure in the Metropolitan Green Belt around London: houses planned in this area have nearly tripled since August 2013. At least three local authorities - Bradford, Durham and Northumberland - have claimed that economic growth justifies an 'exceptional' change to the Green Belt, exploiting a loophole in Government policy. Planning inspectors have signed off major releases of Green Belt for development around cities such as Leeds and Newcastle/Gateshead where there is ample brownfield land available within the urban areas.

### **Flawed proposals for deregulation**

We have also examined several recent reports, from bodies such as the Adam Smith Institute, Centre for Cities and London First, that call for large scale development in the Green Belt. These are based on two propositions which CPRE believes are fundamentally flawed:

*Proposition 1: Green Belt isn't green and is of little environmental value.*

The main value of Green Belt policy is not related to the environmental quality of the land: it is designed to stop urban sprawl. Commentators also fail to understand the importance of land protected as Green Belt. For example, the analysis of the value of Green Belts by the Adam Smith Institute largely relies on a single study carried out in Chester in 1992, suggesting that Green Belt land provided environmental benefits to society worth £889 per hectare per year. This is a massive underestimate for the true value of the Green Belt overall.

Green Belts provide countryside close to 30 million people and give a range of benefits, including 30,000 km of public rights of way, 250,000 hectares of best quality agricultural land, 89,000 ha of Sites of Special Scientific Interest (SSSIs) and 220,000 ha of broadleaf and mixed woodland. Many of these benefits have increased over time and the protection against development afforded by the Green Belt designation will have played a critical role in this. To give one particularly outstanding example, Windsor Great Park (which lies in the Metropolitan Green Belt) has been valued by the Government's Natural Capital Committee as having environmental benefits worth at least £49 million, or £7,600 per hectare per year.

CPRE believes that land management in the Green Belt can be improved for people and wildlife. We support the Natural Capital Committee's call for the creation of 100,000 hectares of new wetland and 250,000 hectares of new woodland - the latter specifically in areas close to large towns and cities<sup>6</sup>. Land currently designated as Green Belt is the obvious place for much of this. But this will only be possible if current planning policy is strengthened, or landowners will seek a much

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<sup>6</sup> Natural Capital Committee, *The State of Natural Capital: Protecting and Improving Natural Capital for Prosperity and Wellbeing, Third report to the Economic Affairs Committee*, January 2015.

higher price in the hope that they can later sell their land for housing development.

*Proposition 2: London and the South East are the only areas where people want to live or jobs can be created, so if we don't allow development in the Green Belt, people will leapfrog it and commute from elsewhere.*

This is demonstrably wrong. London isn't the only place where jobs can be and are being created. The Centre for Cities found that Milton Keynes increased employment rates by 18% between 2004 and 2013,<sup>7</sup> creating new jobs faster than any other town in the country. Other high performers included Hastings and Portsmouth - both places with plenty of brownfield land available for regeneration. The digital sector is seen as a key area in which England's economy is expected to expand in the coming years, and it is often suggested that most of this growth is focused on London. But a February 2015 report by Tech City found evidence of new digital economy clusters across the country, in places like Hull, Liverpool and the North East, and 74% of digital companies based outside London<sup>8</sup>.

We should prioritise building on brownfield sites, which will provide at least 1 million new homes in the short term and at least half as much again in the longer term<sup>9</sup>. In a decade or so we may need to create new or expanded communities about 40-50 miles from London, using brownfield land where suitable, and where plans for both rail connection and new employment are already advanced and locally supported. CPRE already supports development in places like Ashford (Kent), Bicester, and the former Alconbury airfield near Cambridge.

We conclude:

- **Houses planned on Green Belt land are at the highest point since the advent of the Government's flagship planning policy**
- **Recent calls for Green Belt deregulation rest on flawed propositions**
- **National planning and land use policy needs strengthening**

## **Recommendations**

CPRE calls on all the major political parties to take action to protect and improve the Green Belt, and not just profess support while allowing it to be steadily eroded by piecemeal development. We need to build many more homes in England but in a way that sustains our Green Belts for future generations. CPRE is calling for the NPPF to be urgently reviewed by the next Government, and strengthened so that:

- Suitable brownfield sites are prioritised for development before greenfield;
- The amount of land supplied for new housing is based on realistic assessments of what the public, private and social sectors are likely to deliver; and
- Green Belt boundaries should only be changed in genuinely 'exceptional circumstances', and the need for economic growth should not in itself be considered an 'exceptional circumstance'.

The next Government should also initiate a national land use strategy that includes the better protection and management of the Green Belt in future, increasing woodland and wetland cover as called for by the Natural Capital Committee.

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<sup>7</sup> Centre for Cities, *Cities Outlook 2015*, January 2015.

<sup>8</sup> Tech City, *Tech Nation - Powering the Digital Economy*, February 2015.

<sup>9</sup> CPRE, *From Wasted Space to Living Spaces*, November 2014.

# GREEN BELTS UNDER THREAT MARCH 2015

## North West & Stoke on Trent Green Belts:

1. **Blackburn with Darwen:** 810 dwellings
2. **Chester:** 1,300 new dwellings
3. **Heysham:** Link road to M6
4. **Knowsley:** 3,250 dwellings and 42 ha warehousing
5. **Manchester / Tameside:** Airport City and Green Belt review
6. **Sefton:** 5,700 dwellings plus 46 hectares warehousing
7. **St Helens:** 155 ha freight terminal
8. **West Lancashire:** 750 dwellings plus 20 hectares total warehousing and university expansion

## North East:

1. **Newcastle:** 6,000 dwellings
2. **Northumberland:** 2,000 dwellings
3. **South Tyneside and Sunderland:** 20 ha warehousing

## Yorkshire:

1. **Barnsley:** 1,600 dwellings and 45 ha warehousing
2. **Bradford:** 11,000 dwellings
3. **Calderdale:** 6,800 dwellings and 38 hectares of warehousing
4. **Leeds:** 19,400 dwellings
5. **Rotherham:** 2,000 dwellings plus 11 hectares warehousing
6. **Wakefield:** 50 ha of warehousing

## Nottinghamshire:

1. **Broxtowe:** 6,150 dwellings, open cast coal mine and HS2 station
2. **Rushcliffe:** 7,650 dwellings

## Cambridgeshire:

1. 1,885 dwellings and 14.4 ha of offices and warehousing

## West Midlands:

1. **Birmingham Airport:** expansion and new interchange station
2. **Birmingham:** 35,000 dwellings around the city
3. **Warwick:** 550 dwellings

## South West:

1. **Avonmouth - Bridgwater:** New pylons
2. **Bath:** 950 new dwellings
3. **Bristol (north) and South Gloucestershire:** two urban extensions to Bristol of 1,000 and 2,000 dwellings; 15 ha for relief road
4. **Bristol (south):** proposed 5km link road
5. **Christchurch and East Dorset:** 3,370 dwellings and 43 ha warehousing
6. **Gloucestershire:** 8,925 dwellings and 49.9 ha warehousing

## Oxfordshire:

1. 3,510 dwellings and 3.8 ha warehousing

## Metropolitan Green Belt:

1. **Bedfordshire:** 13,000 dwellings; 121 hectares freight terminal and warehousing
2. **Berkshire:** 4,000 dwellings in Windsor and Maidenhead
3. **Buckinghamshire:** Expansion of Pinewood Studios; HS2 route
4. **Essex:** 9,100 dwellings in Basildon; 2,900 in Brentwood; 2,000 in Castle Point; 1,250 in Epping Forest district; 2,785 in Rochford
5. **Hertfordshire:** 34,000 dwellings across Dacorum, North Herts, St Albans and Welwyn Hatfield districts; 146 ha railfreight terminal
6. **Kent:** 450 dwellings near Sevenoaks
7. **Redbridge:** 2,000 dwellings
8. **Surrey:** 15,000 dwellings across Guildford, Reigate and Banstead, Runnymede and Woking; hotel and golf course

