



GREEN BELT UNDER SIEGE: 2017

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Introduction

Green Belts provide the countryside next door for 30 million people and are a major feature of our planning system. They prevent urban sprawl by keeping land open and free of development around our largest, as well as some of our most historic, towns and cities. By doing so, they encourage urban regeneration. Yet more and more houses are being built on Green Belt when plenty of brownfield land is available, close to jobs and services. And, crucially, the houses being built on Green Belt aren't affordable for those who need homes.

After becoming Prime Minister, Theresa May told Parliament: "The Government is very clear that the Green Belt must be protected."¹ The then Housing and Planning Minister, Gavin Barwell, similarly emphasised that "there is still plenty of other land to build on without having to concrete over swathes of our precious Green Belt".² This was a relief to those who responded to CPRE's [poll](#) on the 60th anniversary of the Green Belt in 2015, which found a clear majority of the public (64%) agreeing the Green Belt should be protected.³

Policies relating to Green Belt are contained in the National Planning Policy Framework (NPPF). CPRE has carried out regular evaluations of how Green Belt policy is being implemented since the advent of the NPPF in 2012.⁴ Our analysis has shown that despite years of Government rhetoric that it would protect the Green Belt better than the previous Labour Government, the amount of housing proposed for land to be released from the Green Belt in local plans in 2016 was already more than twice that in proposals in Labour's unpopular regional plans in 2009. We now have a new Government with an opportunity to make sure the rhetoric on protecting Green Belt becomes reality.

At a time when society is engaged in a much needed debate about the type, design and quality of housing required to meet communities' needs, our findings on what type of housing is currently being planned and delivered in Green Belt are particularly pertinent. Deciding where the most appropriate land for housing development is, and how to balance building the homes we need with protection of our precious countryside, has never been more urgent.

Executive summary

Our latest research focuses on three themes:

- the amount of Green Belt land being lost to housing - demonstrated by both local plans and planning permissions granted outside local plans;
- the type of housing built in Green Belt; and
- the impact of the New Homes Bonus on Green Belt.

Our research shows that:

¹ [Prime Ministers Questions](#) 22 February 2017

² [Gavin Barwell at the CPRE Annual Lecture 2017](#)

³ CPRE, [60th anniversary poll shows clear support for Green Belt](#), 2 August 2015

⁴ For the most recent example see CPRE, [Green Belt Under Siege: 2016](#), March 2016

- housing development proposed for the Green Belt in local plans has shot up by another 150,000 to 425,000 houses since our previous report (March 2016)
- the number of planning applications being approved year on year on greenfield sites in the Green Belt has nearly doubled since the NPPF came into force in 2012
- Green Belt boundaries are now being changed to accommodate housing at the fastest rate for at least two decades
- at least 800 hectares of greenfield land in the Green Belt have been developed for a range of commercial or industrial projects, such as offices or retail parks, since 2009
- nearly three-quarters of the housing proposed on land to be released from the Green Belt will be unaffordable for most people living in the local area: planning consultants Glenigan found only 16% of homes built in Green Belt since 2009 were affordable
- with the New Homes Bonus, the Government is providing financial incentives that significantly increase Green Belt release and development, contrary to its own commitments

Overall, the trend we see for low density development in Green Belt is a shocking waste of land, not only in itself but because real social need will continue to go unmet, thereby increasing the pressure for further releases of Green Belt land later down the line to meet genuine need - as opposed to market demand.

We are calling on the next Government to:

- make it clearer that unnecessary or major losses of Green Belt should be avoided
- make sure Green Belt boundaries are reviewed no more than every 15 years - the recommended life of a typical local plan
- reaffirm that high levels of housing demand or housing targets do not in themselves amount to the “exceptional circumstances” required to justify changing Green Belt boundaries
- abandon current methods of calculating housing need that serve to unrealistically inflate housebuilding requirements, such as adjustments to account for so-called “market signals”
- where there is a particularly acute need for affordable housing in Green Belt areas to meet local needs, give more support to small scale, locally led “rural exception site” schemes that are well designed to minimise Green Belt harm
- remove New Homes Bonus funding from development in the Green Belt, and nationally protected landscapes, that either does not meet local needs (as clearly distinct from market demand) or does not involve the regeneration of suitable brownfield land

CPRE research

Local plans

As in previous years, CPRE asked its county branches across England to tell us about any proposals in adopted or advanced local plans to release land from the Green Belt for housing development and other purposes.

The threats we outline below arise from the amount of development being proposed on Green Belt land through local plans that we know about (Table 1). The true figures could be much higher.

We found that, despite Government commitments to enforce their own policies on Green Belt protection, the number of houses now planned for the Green Belt stands at over 425,000, an increase of 50% on 2016. It is also nearly triple the number of homes proposed on Green Belt under Labour’s unpopular regional plans, one of the key reasons why they were abolished.

Green Belt boundaries are now being changed to accommodate housing at the fastest rate for at least two decades.

Table 1: Development proposed in local plans

| Date | Houses proposed for land released from the Green Belt | New homes proposed per month | Commercial land |
|-----------------------------|---|------------------------------|-----------------|
| 2009 (draft regional plans) | 147,000 | | n/a |
| August 2012 | 81,000 | | 1,000 ha |
| August 2013 | 150,000 | 5,750 | 2,100 ha |
| March 2015 | 219,000 | 3,830 | 2,000 ha |
| March 2016 | 275,000 | 4,670 | 2,190 ha |
| May 2017 | 425,000 | 10,710 | 2,400 ha |

Over a third (34%) of current proposals are in adopted plans that have been endorsed by Government. Planning inspectors have signed off major releases of Green Belt for development around cities - even though there is ample brownfield land available within nearby urban areas - including Birmingham, Bradford, Cheshire East and Sefton in the past 12 months, following earlier releases approved in Cheshire West and Chester, Knowsley, Leeds, and Newcastle/Gateshead. Of the remainder, a further 15% have been submitted for examination, 45% are in draft form, and 5% arise from the National Infrastructure Commission’s proposals for 20,000 homes on the edge of London, associated with Crossrail 2.

In 2015/2016, Green Belt boundaries were amended formally in eight local plans to accommodate development that led to a decrease of over 1,000 ha.⁵ While this is a reduction from 11 local planning authorities the previous year, it still represents 80% of the total number of adopted local plans in areas of Green Belt (i.e. 10), suggesting that Green Belt alterations are becoming routine rather than being the “exceptional” circumstances of Government policy. There are also many more proposals in the pipeline.

Speculative planning applications on land in the Green Belt

So far, this briefing has considered proposals to remove land from the Green Belt in order to develop it for housing. But there is a further important element. On land where Green Belt policy continues to apply, development of housing on open greenfield land is normally inappropriate, unless “very special circumstances” can be proven. As mentioned above, development of suitable brownfield (previously developed) land and buildings can be appropriate, especially if new buildings keep within the footprint of the previous buildings on the site.

CPRE commissioned planning consultants Glenigan to provide a detailed analysis of planning applications for developments of more than 10 houses submitted on designated Green Belt land since 2009, differentiating between land that is brownfield or greenfield. Glenigan also looked at the building of primarily affordable schemes for the social sector, as well as proportions of affordable housing delivered within private developments. This allows for a

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551240/Green_Belt_Statistics_England_2015-16.pdf

judgement to be made of the impact of the NPPF on control of development in the Green Belt. The Glenigan data shows that:

- the number of major planning applications being approved year on year on greenfield sites in the Green Belt has nearly doubled since the NPPF came into force in 2012, from 15 per year to 27
- the number of houses being approved year on year on greenfield sites in the Green Belt has more than doubled since 2012, from just over 1,600 per year to more than 3,600
- at least 800 hectares of greenfield land in the Green Belt has been developed since 2009 for a range of commercial or industrial projects such as offices or retail parks; this is equivalent to building on an area two-thirds the size of Heathrow airport

Additionally, Government Land Use Change statistics show that in the period 2013 to 2016, 5,427 ha of undeveloped Green Belt land changed to a developed use. In 2015/16 11% of all land changing to developed uses was in the Green Belt:⁶ this figure has only been reported as higher in seven of the past 27 years.

These figures will be largely, if not entirely, additional to the housing being proposed on land to be released from the Green Belt in local plans. Again, the picture is one of the Government and local authorities being content to allow increasing levels of development on open, greenfield land in the Green Belt.

The findings of the Glenigan data on affordable housing follow in the next section.

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/595749/Land_use_change_statistics_England_2015-16_-_2_March_2017_version.pdf

Housing that fails to meet communities' needs

CPRE is also deeply concerned about the type of housing being typically proposed on Green Belt land, as well as the amount. Developers and some think tanks have argued for a massive opening up of the Green Belt for housebuilding, partly on the grounds that providing more land with planning permission for housing will lead to those houses becoming more affordable. But current practice suggests this scenario is far removed from reality.

CPRE has analysed current or emerging local planning policies on affordable housing in areas where major Green Belt release is proposed. We found that just 28%, 118,900, of the houses would be affordable.⁷ This ranges from 42% in London and the South East to just 17% in the West Midlands. (See Table 2 on next page.) Most local plans now state that new housing can meet the requirement to be “affordable” if it meets the current Government definition, which means that the element of affordable housing that is housing for rent can be rented at rates of up to 80% of open market rents. With one or two exceptions in areas such as Bath and North East Somerset and Woking, the planning policy requirement for affordable housing is usually the same on sites to be released from the Green Belt as it is elsewhere. Such costs may not necessarily be affordable to people living locally. The 28% figure also assumes that local plan policies on building that proportion of affordable homes are actually adhered to.

However, even these percentages are a best case scenario. In many, if not all, cases the local plan targets are unlikely to be met in full, because the NPPF allows for policy requirements to be negotiated down, and the development then to proceed, if a developer can prove that providing the target percentage of affordable housing will make a development “unviable”, that is, threaten their expected profit projections on the build.

CPRE’s finding on current plans is reinforced by Glenigan data on the planning permissions that have actually been granted over the past few years: it reflects an overall pattern of increasing development of unaffordable housing in the Green Belt. Their data shows that only 16% of the new housing actually granted permission in the Green Belt since 2009 comes into the category of either “affordable” or social housing - significantly lower than local plan policies anticipated. Within this, it is also notable that the proportion of affordable housing on brownfield sites in the Green Belt (21%) is significantly higher than for greenfield sites (only 12%). It should also be noted that Glenigan classes student housing as social housing and therefore this is included within the “social housing” total. The 16% proportion on Green Belt sites is comparable to the affordable proportion of all new houses started.⁸ Both CPRE’s work on local plans and Glenigan’s data demonstrate that developers are building no more affordable homes on Green Belt sites than on any other site.

Furthermore, many local plans state clearly that the priority is not to provide affordable housing, but large houses to service demand at the top end of the market. Nowhere is this more brazenly stated than in the draft Greater Manchester Spatial Framework (GMSF), which has proposed over 56,000 houses - possibly the largest amount of housebuilding in the Green Belt ever seen in a recent plan. The proposed releases around Oldham, Rochdale and Tameside in particular include calls for “large residential properties”, “a significant proportion of higher value executive homes”, and “low density housing targeting the top end of the market”. In these and many other cases there is little or no commitment to providing any affordable housing. Partly in response to this issue, the newly-elected Mayor of Greater Manchester, Andy Burnham, has already announced a review of the GMSF.

⁷ The Government definition of affordable housing is set out in the National Planning Policy Framework (NPPF) and includes social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. “Affordable rented” can include housing rented at up to 80% of the market rate. Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above.

⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/593883/House_Building_Release_December_Qtr_2016.pdf, p.6.

Such low density development is a shocking waste of land, not only in itself but because real social need will continue to go unmet, thereby increasing the pressure for further releases of Green Belt land later down the line to meet genuine need - as opposed to market demand.

Table 2: Affordability of homes proposed for Green Belt

| Region | Number of new homes proposed on the Green Belt March 2016 | Number of new homes proposed on the Green Belt May 2017 | Number of Affordable homes May 2017 | % affordable homes May 2017 |
|---------------------------------|--|--|--|------------------------------------|
| East of England | 73,520 | 65,277 | 24,084 | 37 |
| East Midlands | 18,475 | 18,475 | 5,543 | 30 |
| London and South East | 41,860 | 71,062 | 29,690 | 42 |
| North East | 11,550 | 12,650 | 2,075 | 16 |
| North West | 19,024 | 97,528 | 22,928 | 24 |
| South West | 17,195 | 32,030 | 11,025 | 34 |
| West Midlands | 44,170 | 72,650 | 12,243 | 17 |
| Yorkshire and the Humber | 46,900 | 55,000 | 11,290 | 21 |
| Total | 272,694 | 424,672 | 118,878 | 28 |

If “exceptional” or “very special” circumstances are to mean anything, then development in the Green Belt should only take place where it has an unusually strong justification that outweighs the damage or loss of undeveloped Green Belt land, particularly in terms of directly meeting the specific housing or other needs of the local community whose Green Belt is being lost. This should involve a full search for more suitable options such as urban brownfield sites, and also evidence of a particularly acute need for affordable housing which cannot be met elsewhere.

Encouraging councils to build the wrong housing in the wrong places

We also looked at the way the Government encourages new housing development financially and how that impacts on Green Belt. We estimate that the Government will subsidise the proposed development in the Green Belt at around £2.44billion,⁹ through the New Homes Bonus scheme, assuming the scheme will remain in place over the lifespan of the local and strategic plans (around 15 years). (See box below.)

What is the New Homes Bonus?

The New Homes Bonus was introduced in 2011 by the Coalition Government, following political pledges for communities to gain more benefit from new development. The scheme aims to reward local authorities for the amount of new housing built in their area, although it has come against a backdrop of more far-reaching cuts in overall central Government grants to local authorities, which mean that permitting new housing development is one of few ways in which councils can fund essential local services.

Since its introduction £3.4 billion of funding has been allocated under the scheme, with a further £1.46 billion set to be spent in 2016/17. The scheme was reformed in 2016, mainly to prevent costs from spiralling when housebuilding levels were expected to increase.

Payments, typically £1,530 per house to match the level of council tax raised, are made when new houses are built and are then repeated for a period of four years. An additional £350 is awarded for each new affordable home. Payments are made mostly to district or unitary councils; proportions also go to county councils in areas with two tiers of local government.

The New Homes Bonus provides additional incentives for local authorities to deliver affordable houses. Any house meeting the Government's current definition (see above) is thereby eligible. But as pointed out above, most of the new housing proposed in the Green Belt will not be affordable. The Government is therefore spending at least £2 billion undermining its own commitment to protect the Green Belt, and on housing that would probably have been built anyway. If the New Homes Bonus can in future be more targeted towards brownfield development within urban areas within or beyond the Green Belt, such housing can instead be built in more sustainable and less damaging locations.

Table 3: New Homes Bonus distribution for 2015/16

| Region | New Homes Bonus received by local planning authorities in 2015/16 |
|---------------------------------|--|
| East of England | £391m |
| East Midlands | £84m |
| London and South East | £410m |
| North East | £77m |
| North West | £529m |
| South West | £163m |
| West Midlands | £445m |
| Yorkshire and the Humber | £337m |
| Total | £2,436m |

⁹ The figure of £2.44billion is a very conservative estimate. It assumes that overall levels of housebuilding where local authorities are proposing to release land from the Green Belt will continue at current rates and will not increase. The figure could be higher still if, for example, there is a continued increase in the amount of development allowed on land remaining in the Green Belt, building on the trends observed by Glenigan.

Conclusions

The Housing White Paper, on which consultation had just closed at the time of writing, suggests that Ministers realise that indiscriminate release of Green Belt is a growing problem. The White Paper proposes to provide, for the first time, a definition of the “exceptional circumstances” test, which sets out whether Green Belt boundaries should be altered in development plans. It also suggests a number of changes to Green Belt policy, in particular that boundaries should only be altered where all other options for accommodating development requirements, in particular suitable brownfield land, have been exhausted.

In our response to the White Paper, CPRE agreed with the Government’s aims of bringing more transparency and clarity to the process of reviewing Green Belt boundaries. But we believe that the White Paper proposals will do little in themselves to reduce pressure on the Green Belt, and are likely, in fact, to represent a weakening of policy. We have particular concerns about the lack of clarity in the White Paper that Green Belt boundaries should be regarded as permanent and play a strategic, city-regional role, rather than be nibbled at by individual district councils or neighbourhood plans. We have also reiterated that Green Belt boundaries should be altered no more frequently than the 15-year life of a typical local plan.

Other organisations share our concerns to greater or lesser degrees. These include Wildlife and Countryside Link (in a response supported by the National Trust, RSPB and The Wildlife Trust as well as CPRE), the Royal Town Planning Institute, and the House of Commons Communities and Local Government Select Committee.

Notwithstanding our concerns about Green Belt development, CPRE shares the widely-held view that more new housing needs to be built across England. Indeed, some building can already take place on Green Belt land under current policies, without harming the purposes of Green Belts.

Around 7% of the Green Belt is classed as brownfield and in some cases, such as the former Cane Hill Hospital in Croydon, south London, this land is suitably placed for development. In addition, well designed small scale development has taken place on “rural exception sites” in the Green Belt specifically to provide affordable housing for local needs, for example in villages like Hinton Charterhouse in North East Somerset. There is a vast amount of brownfield suitable for redevelopment in our towns and cities and this needs to be prioritised as the best place to meet our housing needs. CPRE research has demonstrated that at least 1.1 million homes can be built on suitable brownfield sites across England.¹⁰

Pulling the work of CPRE and Glenigan’s analysis together we find a startling picture of accelerating Green Belt loss, with Green Belt boundaries now being changed to accommodate housing at the fastest rate for at least two decades. This is against a background of repeated Government commitment to protect the Green Belt. In local plans, development proposed for land that is currently Green Belt has shot up by at least another 150,000 to more than 425,000 houses, while the number of planning applications being approved year on year on greenfield sites in the Green Belt has nearly doubled since the NPPF came into force in 2012.

On top of that, at least 800 hectares of greenfield land in the Green Belt has been developed since 2009 for a range of commercial or industrial uses, such as retail parks.

Depressingly, at a time when more than 1.8 million households in England are waiting for a “social” home,¹¹ a clear majority of the housing proposed on land to be released from the Green Belt will be unaffordable for most people living in the local area.

¹⁰ CPRE Housing capacity on suitable brownfield land. November 2016:
<http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4416-housing-capacity-on-suitable-brownfield-land>

¹¹ Shelter 2017 from <http://data.gov.uk/dataset/england-hssa-housing-strategy-statistical-appendix>

And in a final irony, with the New Homes Bonus the Government appears content to financially incentivise significant increases in Green Belt release and development that undermine its own policy to protect it. The result is unnecessary loss of countryside and development that fails to give people the homes they need.

This report is aimed primarily at central Government and local authorities. However, in a number of areas of the country, newly elected metro mayors are likely to have increasing influence on how Green Belt policy is implemented on the ground. Of the six that were elected in May 2017, three (or half the total number) pledged to uphold Green Belt protection and/or reduce pressure for development on it. These three were in Greater Manchester (Labour's Andy Burnham), the West Midlands (The Conservatives' Andy Street) and West of England (The Conservatives' Tim Bowles), respectively. We look forward to working with them, as with the new Government, to turn rhetoric into reality.

Recommendations

To demonstrate its commitment to protecting the Green Belt, CPRE believes that the new Government should:

- make it clearer that unnecessary or major losses of Green Belt should be avoided
- make sure that Green Belt boundaries are reviewed no more than every 15 years - the recommended life of a typical local plan
- reaffirm that high levels of housing demand or housing targets do not in themselves amount to the "exceptional circumstances" required to justify changing Green Belt boundaries
- abandon current methods of calculating housing need that serve to unrealistically inflate housebuilding requirements, such as adjustments to account for so-called "market signals"
- where there is a particularly acute need for affordable housing in Green Belt areas to meet local needs, give more support to small scale, locally led "rural exception site" schemes that are well designed to minimise Green Belt harm
- remove New Homes Bonus funding from development in the Green Belt, and nationally protected landscapes, that either does not meet local needs (as clearly distinct from market demand) or does not involve the regeneration of suitable brownfield land

CPRE, July 2017

Green Belts Under Threat May 2017

Number of dwellings proposed

