Space to breathe

A State of the Green Belt report

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Executive Summary

Providing space to unwind, engage with nature - and also grow our food - the Green Belt is the countryside next door for 30 million people in some of our largest and most historic cities. The urgent need to help us address the climate emergency and give people more opportunity to engage with nature means that our Green Belts have never been more important.

Yet this space is under threat like never before: from the impacts of climate breakdown to development in the countryside. CPRE, the countryside charity has published regular reports detailing development proposals on the Green Belt since 2012. This report highlights the unprecedented proposals for building housing in the Green Belt, squandering this valuable asset at a time where it is needed for our own health and wellbeing, and to address the climate emergency, more than ever before.

This report shows that:

- **Where the Green Belt has been developed, it is providing executive housing, without the affordable homes that people need and is failing to make the best use of land.** For example, just 13% of homes built on greenfield land removed from Green Belt designation in local plans over the past decade are 'affordable', even according to the government's flawed definition. Meanwhile, housing development in the Green Belt is just 14 dwellings per hectare, far below that needed to support sustainable communities.

- **The threat to the Green Belt is unprecedented and is set to deliver yet more executive housing, not homes that people who need them can afford to live in.** More than 266,000 homes are proposed on greenfield land to be removed from Green Belt designation in advanced local plans. Altogether, 27% of the homes approved on greenfield land in the Green Belt in the past 10 years are considered 'affordable', far below the average local policy requirements.

In order to address both the housing crisis and the climate emergency, we recommend:

- **Brownfield first:** The government introduces a clear brownfield first policy and targets funding, to ensure suitable urban land that has already been built on is prioritised for redevelopment.

- **Enhancement of Green Belt:** Green Belt is valued as much by local authorities, government and developers as the countryside on our doorstep as it is by the public – and promoted and enhanced so that it can continue to provide benefits to communities and wildlife, and support efforts to address the climate emergency.

- **Stronger tests for development:** The government strengthens the tests, including the evidence required, to justify exceptional or very special circumstances to remove greenfield Green Belt land, or build within it, respectively. Additionally, any development in the Green Belt must be exceptional, showcasing best practice in:

  1. Using land efficiently by building to a higher density, encouraging sustainable transport such as walking, cycling and public transport.

2. Delivering more than the minimum policy requirements for affordable homes, particularly for social rent.
3. Delivering more than the minimum requirements for enhancing the environment, including through biodiversity net gain.
4. Protects and enhances access to the Green Belt for all by maintaining and improving footpaths near train stations.

- **Land reform:** The government commits to land reform so the number of affordable homes and environmental enhancements in all developments are maximised.

1. Introduction

The Green Belt is the countryside next door for more than 30 million people. It gives our cities and towns space to breathe, and enables wildlife and communities to thrive. Escaping from urban life into the tranquil countryside improves our health, boosts our mood, and gives us pause to reflect on the world around us. The recent report, Monitoring Engagement with the Natural Environment, showed how important the green space on our doorstep is.[1] Green Belts provide a space for nature with a significant proportion of our nature reserves, and contain more than double the national density of public rights of way.[2] Crucially, we are also facing a climate emergency. Revitalising and protecting our living green spaces has never been more important, and habitats in the countryside on our doorstep will play a vital role in sequestering carbon and mitigating the worst impacts of climate change. For example, the Green Belt can provide space to plant trees and hedgerows, reduce flooding and cool our towns and cities.

CPRE led the campaign for the creation of Green Belts. To date, they have been a great success by protecting the countryside near to many of our towns and cities and reducing the damage of urban sprawl on both people and the environment.

The importance of maintaining the Green Belt for current and future generations is clear and public support to do so remains high.[3] This is reflected by the 'exceptional circumstances' under which land can be removed from Green Belt designation in the National Planning Policy Framework (NPPF) and the need for 'very special circumstances' under which development can be allowed in Green Belt. However, these valued spaces are under huge pressure from development, and some commentators believe that loosening planning restrictions will enable us to build the homes we need. Development can push these vital lungs of our cities further away from communities, fragment spaces for wildlife and reduce the ability of Green Belts to support our efforts to address the climate emergency.

At the Conservative party conference, in September-October 2019, a number of Conservative MPs, including secretaries of state Theresa Villiers and Robert Jenrick, reiterated the government's commitment to protecting the Green Belt as a resource for our towns and cities.

This report investigates past and future proposals for development of greenfield Green Belt land. It shows that building on the Green Belt is not the answer to the housing crisis, and instead recommends investment in the Green Belt for the enjoyment of communities today and for generations to come. The methodology, including a description of the ways in which Green Belt can be built on, is in Annex 1.

2. Analysis of completed developments

Our research shows that, while small in number, developments on both greenfield land where Green Belt designation has been removed through local plans, and greenfield land in the Green Belt through planning applications, are not providing homes that people can afford. The developments are land hungry and overlook opportunities to redevelop land that has already been built on (often called brownfield, or previously developed, land).

2.1 Affordability

Green Belt developments are providing executive housing, and not homes that are affordable for people that need them.

Of homes completed on greenfield land that has been removed from Green Belt designation over the past 10 years, and built since 2015/16, just 13% are affordable (Table 1).

This inadequate proportion is repeated on development within the Green Belt as shown in Table 1.

Table 1. The number of homes completed both on greenfield land removed from Green Belt designation and land within it 2015/16-2018/19. Source: Glenigan data and additional CPRE analysis

	Number of housing units on completed sites	Number of affordable homes on completed sites	Proportion of affordable homes on completed sites
On greenfield land removed from Green Belt designation (2015/16-2018/19)	804	106	13%
On greenfield land within the Green Belt (2015/16-2018/19)*	4,389	706	16%

*Note that a further 7 projects for 1,000 homes were also completed but the number of affordable homes figures were not clear in the associated documentation accompanying the planning application.

2.2 Density

In addition to not providing homes that people can afford, development on the Green Belt is inefficient and land hungry. The average density of newly created residential addresses within the Green Belt is just 14 dwellings per hectare (dph), compared with an average of 31 dph outside the Green Belt.[5] Within the Green Belt, the density of developments on greenfield land is lower than on brownfield land.

Current low-density development in the Green Belt is failing to make the best use of land. Since 2013/14, of Green Belt land that has been changed to residential land uses, 66% was previously greenfield, most of it used for farming.[6] Last year was the second highest loss of greenfield land in the Green Belt on record.

Where there are exceptional or very special circumstances for releasing Green Belt land or building on it, as well as for house building more widely, development needs to occur at much higher densities than at present. This is needed not only to reduce pressure on the Green Belt and greenfield land, but to help support thriving communities, address the climate emergency by encouraging more sustainable lifestyles, and allow more people to access the countryside.[7] Research by CPRE London has found that lower density developments in the Green Belt could lead to upwards of five million car journeys.[8] This is unacceptable in the face of a climate emergency. In contrast, high density development can support the use of public transport and encourage more active modes of travel, thereby reducing reliance on private cars. Active travel and reduced car use can improve the health and wellbeing of local communities by reducing air pollution, encouraging more active lifestyles, and leaving more space for green infrastructure in lieu of car parking spaces.[9]

2.3 Brownfield

CPRE's State of Brownfield 2019 report showed that there is space for more than 1 million homes on suitable brownfield land available for development across England, and that it is a perpetually regenerating resource. Brownfield land is land that has already been developed. Work across the CPRE network, and by others, shows that this is just the tip of the iceberg. By redeveloping suitable sites and by making better use of land that has already been built on, we can build more homes in places people want to live.

Reusing suitable brownfield land can breathe new life into our towns and cities and support more sustainable lifestyles whilst protecting the Green Belt. It can also help us to address the climate emergency, for example by protecting soils and reusing materials.

Not all development in the Green Belt is necessarily harmful, including the regeneration of suitable, well-located brownfield sites. Therefore, these have been removed from the analysis.

3. Analysis of planned development

Our research shows that there is a huge pipeline of development proposed on the Green Belt: on land to be removed from Green Belt designation in local plans; subsequent planning applications on this land; and through planning applications on Green Belt land.

3.1 The removal of land from the Green Belt

When local plans are reviewed, Local Planning Authorities (LPAs) often remove land from Green Belt designation to provide space to meet housing targets. According to planning policy, this should only happen under 'exceptional circumstances'. Whilst our broad perception is that local authorities are following the correct procedure in how they assess the Green Belt and are contributing to a more transparent process, we are worried that the bar of 'exceptional circumstances' is set too low.

This year's research focused on plans that had reached a late stage in their development (pre-submission publication under Regulation 19 or later - for more details please see Annex 1).

Excluding plans that are at an earlier stage in the plan-making process from the figures in this report, means that many proposals to remove Green Belt designation - for example, those within the Greater Manchester Spatial Framework and around Birmingham - are not included.

We found that land for a minimum of 266,000 homes is planned on land that has been removed from Green Belt designation in adopted plans or will be removed in emerging plans in the near future across 81 LPAs (Table 2). The equivalent figure for last year, had we done the calculations in the same way, would have been approximately 220,000 homes, demonstrating that LPAs continue to plan to remove more land from the Green Belt each year.

Table 2. The number of homes proposed on land to be removed from Green Belt designation in local planning documents. Source: CPRE research August 2019

Status of local plan	Number of homes
Adopted plans	120,624
Emerging plans*	145,465
Total	**266,089**

*This includes plans that are pre-submission publication, have been submitted and have been found sound by the Planning Inspectorate

We expect the number to continue to rise for the foreseeable future as further plans that are at an earlier stage of the local plan allocate land in the Green Belt for development. Several local authorities (for example Bath and North East Somerset, Rotherham and Vale of White Horse) that have recently removed land from the Green Belt for housing are planning to remove more. The NPPF is clear that permanence is one of the essential characteristics of Green Belts. Redefining Green Belts in every local plan review is not consistent with the concepts of either permanence or exceptional circumstances.

As part of the process of reviewing Green Belt boundaries, LPAs are required to plan positively for the Green Belt, including the improvements that can be made to compensate for land that is to be developed. At present, LPAs do not seem to be doing this. This is a missed opportunity to enhance the Green Belt so it can provide more benefits for people and to help address the climate emergency.

Local plans also set affordable housing policies. The average policy for sites removed from Green Belt is 34%. Figures of proposals that have been completed or granted planning permission are much lower than this. In 2018, CPRE, alongside other organisations such as Shelter, successfully called for the closure of a loophole that enabled developers to reduce the number of affordable homes they provided.[10] However, in order to ensure that new developments, wherever they are, build homes that the people who most need them can afford, a wider system of land reform is required.[11]

3.2 Applications on land removed from Green Belt designation

Statistics from MHCLG show that the number of LPAs releasing land in their local plans has increased significantly since the introduction of the NPPF.[12]

There has been a marked increase in development activity on this land in the past four years. The majority (75%) of this activity is on greenfield land. Table 3 below shows that applications for more than 10,000 homes have been approved on greenfield land since 2010, with just 27% planned to be affordable. These homes only account for a small proportion of the overall number planned on land removed from Green Belt designation.

Case study: In 2018 Birmingham adopted its local plan. This included the removal of land from Green Belt designation in Sutton Coldfield for up 6,000 homes. Recent proposals suggest that the development will not only provide fewer homes (down to 5,000), but it has also been delayed. This has added to other pressure on the council who have had to grant planning permission on sites that are not allocated in the development plan.

Table 3. The number of homes on greenfield land that have been granted planning permission on land removed from Green Belt designation 2010/11-2017/18. Source: Glenigan data and additional CPRE analysis

	Number of units approved	Number of affordable housing units	Proportion of affordable housing
Total	10,148	2,743	27%

Affordability is regularly cited as a reason to increase the number of homes planned. However, these figures show that the proportion of affordable homes delivered is far below the average affordable housing policy of 34% (see Section 3.1). This is likely to exacerbate pressure on those wanting to find a home they can afford to live in, and on councils to allocate even more designated land for development.

3.3 Applications on land within the Green Belt

Approved applications on existing Green Belt land: Table 4 and Figure 1 illustrate the increasing number of homes that have been granted planning permission over the past decade. In 2018/19, of those applications where the number of affordable homes secured was clear, just 25% meet the government's definition of affordable. While this is higher than previous years, it is still significantly below the average percentage required in local plan policies (see Section 3.1).

Submitted applications on existing Green Belt land: Similarly, Table 4 and Figure 2 illustrate how planning applications on land currently designated as Green Belt continues apace. The number of residential applications on greenfield sites in the Green Belt is the highest it has ever been, at 155 applications in 2018/19. The 27,308 resulting housing units are the highest number in one year since 2009. This is more than the number of homes that have been granted planning permission in total over the past 10 years. The bar of 'very special circumstances' is clearly considered one that can be overcome by those submitting planning applications.

Table 4. Number of submitted and approved applications and resulting number of housing units since 2009/10 to 2018/19. Source: Glenigan data

	Number of housing units	Number of applications
Approved applications	24,081	215
Submitted applications	105,197	685

Figure 1. The number of applications (left) and the number of units (right) approved on greenfield land over the past 10 years. Source: Glenigan data
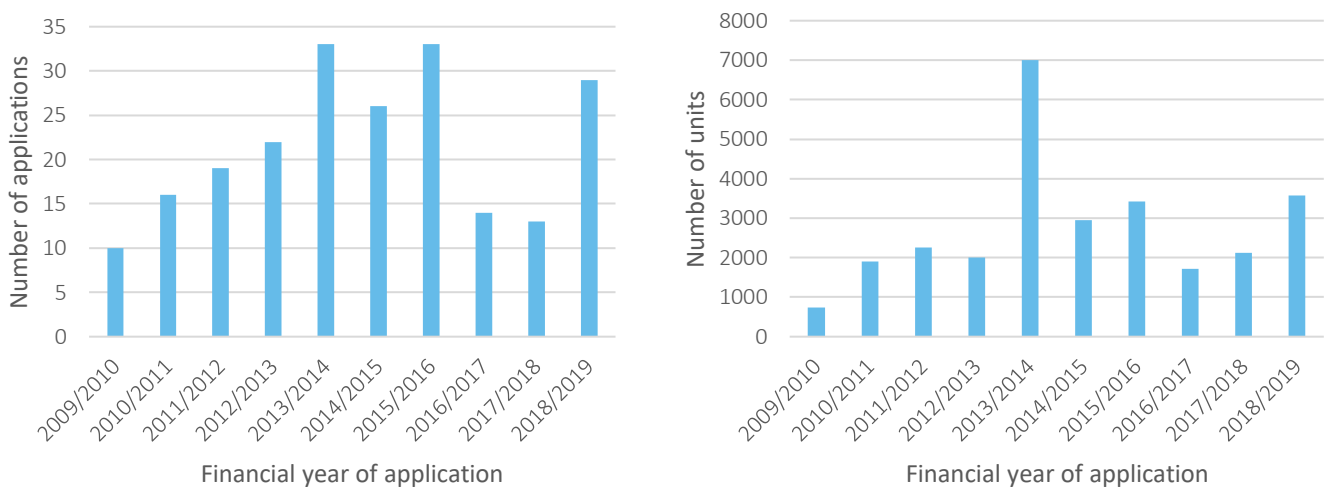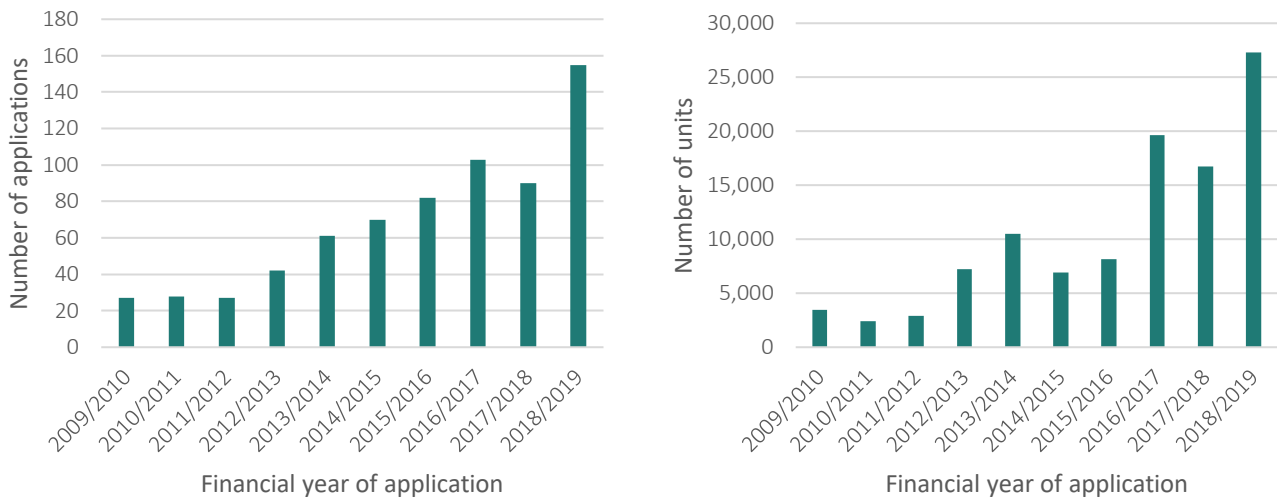
Figure 2. The number of applications (left) and the number of units (right) submitted on greenfield land over the past 10 years. Source: Glenigan data

4. Conclusion and recommendations: Do we invest in our Green Belt and brownfield land or do we continue to build homes that people cannot afford and is failing to make the best use of land?

All too often, our Green Belt is seen simply as land preventing developers from solving the housing crisis. However, as this report shows, we have been squandering our Green Belt by not building the affordable homes that meet housing need and by not making good use of the land when it is built on. At the same time, swathes of land that has already been built on lies wasted and under-used and the housing crisis continues.

It is also clear that we are reaching a tipping point. The increasing number of housing units proposed on Green Belt land has continued to rise since 2012 and the advent of the NPPF. Experience shows that the proposed units will not deliver the affordable homes promised and that these threats are continuing to rise.

On the other hand, Green Belts provide a huge opportunity to help us in our efforts to address the climate emergency and wildlife crisis, while supporting the improved health and wellbeing of communities in our towns and cities. We can restore and enhance the Green Belt to provide a space for nature and as a place to relax, play and grow our food.

In order to deliver a positive future for our Green Belt, and build the homes we need, we recommend:

- The government introduces a clear brownfield first policy and targets funding, that ensures suitable urban land that has already been built on is prioritised for redevelopment.
- Green Belt is valued as much by local authorities, government and developers as the countryside on our doorstep as it is by the public – and promoted and enhanced so that it can continue to provide and provide more benefits to communities and wildlife and support efforts to address the climate emergency.

- The tests are strengthened, including the evidence required, to justify exceptional or very special circumstances to remove or build on land in the Green Belt respectively.
- That, where evidenced and justified as above, new development in the Green Belt, or on land removed from it, is itself exceptional. Development must showcase best practice in:
  1. Using land efficiently by building at higher density, encouraging sustainable transport such as walking, cycling and public transport.
  2. Delivering more than the minimum policy requirements for affordable homes, particularly for social rent.
  3. Delivering more than the minimum requirements for enhancing the environment, including through biodiversity net gain.
  4. Protects and enhances access to the Green Belt for all by maintaining and improving footpaths near train stations.

The government commits to land reform so that affordable homes and environmental enhancements of all developments are maximised.

Annex 1: Method

This report investigates the two key ways in which Green Belt is developed:

1. 'Exceptional circumstances' are required to remove land from the Green Belt, usually with the intention of future development, through the local plan process.
2. 'Very special circumstances' are required to build on land currently designated as Green Belt determined through planning applications.

As with previous CPRE Green Belt reports, this report incorporates a range of data sources:

- **Planning application data**: a dataset and report detailing the planning applications was provided by Glenigan, a construction industry research consultancy. Further details of their approach is within their reports. Additional analysis of planning application documentation provided the affordable homes figures for each application.
- **Local plans**: The data includes proposals identified in plans that have reached a late stage in their development, from 'pre-submission' (regulation 19) publication to adopted plans. We did not include allocations for safeguarded land and previously developed land whenever possible. When we could not determine exact proposals to remove Green Belt designation local planning documents, we contacted Local Planning Authorities (LPAs) directly.
- **Government publications**: are used and referenced where relevant, in particular the Land Use Change Statistics.

Note that we would like to consider proposals to remove Green Belt designation in terms of the amount of land removed, but not all plans are clear on how much land is to be removed to accommodate residential development, tending instead to focus on the numbers of housing units that land is anticipated to deliver. This makes it hard to analyse density assumptions.

[1] Natural England 2019. People's engagement with nature. Accessed from https://defra.maps.arcgis.com/apps/Cascade/index.html?appid=d5fe6191e3fe400189a3756ab3a4057c on 7 October 2019

[2] CPRE 2016. Our Green Belt: worth investing in. Accessed from https://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4451-our-green-belt-worth-investing-in on 7 October 2019

[3] CPRE 2019. YouGov Survey showed 63% of people opposed changes that would make it easier to build on Green Belt. Unpublished.

[4] CPRE 2019. New 'affordable' housing definition could slash rural rent prices by up to half. Accessed from https://www.cpre.org.uk/media-centre/latest-news-releases/item/5157-new-affordable-housing-definition-slash-rural-rent-prices-up-to-half on 7 October 2019

[5] MHCLG, 2019. Table P330 - Live tables on Land Use Change Statistics: 2017-2018 residential address change. Accessed from https://www.gov.uk/government/statistical-data-sets/live-tables-on-land-use-change-statistics on 7 October 2019

[6] MHCLG, 2019. Table P382 - Live tables on Land Use Change Statistics: 2017-2018 land use change tables. Accessed from https://www.gov.uk/government/statistical-data-sets/live-tables-on-land-use-change-statistics on 7 October 2019

[7] Transport for New Homes 2019. Project summary and recommendations. Accessed from http://www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf on 7 October 2019

[8] CPRE London 2018. Driving in Circles: traffic in London's Green Belt. Accessed from http://www.cprelondon.org.uk/resources/item/2379-drivingincircles on 7 October 2019

[9] Transport for New Homes 2019. Project summary and recommendations. Accessed from http://www.transportfornewhomes.org.uk/wp-content/uploads/2018/07/transport-for-new-homes-summary-web.pdf on 7 October 2019

[10] For example see: CPRE and Shelter 2018. Viable villages: closing the planning loophole that undercuts affordable housing in the countryside. Accessed from https://www.cpre.org.uk/resources/housing-and-planning/item/4781-viable-villages-closing-the-planning-loophole-that-undercuts-affordable-housing-in-the-countryside on 7 October 2019

[11] CPRE 2019. The market is broken: high cost of land denying people homes https://www.cpre.org.uk/media-centre/latest-news-releases/item/5144-the-market-is-broken-high-cost-of-land-denying-people-homes on 7 October 2019

[12] MHCLG 2018. Green Belt statistics https://www.gov.uk/government/collections/green-belt-statistics on 7 October 2019

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CPRE is the countryside charity that campaigns to promote, enhance and protect the countryside for everyone's benefit, wherever they live.

With a local CPRE in every county, we work with communities, businesses and government to find positive and lasting ways to help the countryside thrive – today and for generations to come.