

GREEN BELT UNDER SIEGE: 2016

Summary

A year ago CPRE published *Green Belt under siege*.¹ This analysis showed that despite five years of Government rhetoric that it would protect the Green Belt better than the previous Labour Government, local plan proposals in 2015 to release Green Belt land for housing already exceeded proposals in Labour's unpopular 2009 regional plans.

The rhetoric keeps coming. In the past 12 months, the Conservative manifesto for the 2015 election committed the incoming Government to protecting the Green Belt,² and Prime Minister David Cameron told CPRE: 'Green belt land is extremely precious. Protecting the lungs around our cities is paramount for me'.³ Indeed, CPRE's [poll](#) on the 60th anniversary of the Green Belt found a large majority of the public shared his feelings, with 64% agreeing the Green Belt should be protected.⁴

The reality has been very different. Only last month the Secretary of State for Communities and Local Government Greg Clark decided that 1,500 new homes should be built on Green Belt between Gloucester and Cheltenham in one of the biggest developments on Green Belt for a decade.

And now CPRE's latest research reveals figures that show that housing development proposed for the Green Belt has shot up by another 50,000 to more than a quarter of a million houses, making a mockery of Government commitments to protect it.

At the same time the Government is proposing changes to the National Planning Policy Framework (NPPF) that are likely to open the door to further Green Belt release, while the Government-appointed 'Local Plans Expert Group' has encouraged Green Belt reviews.⁵

CPRE's research

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. The true figures could be much higher. They also don't include planning applications being granted by councils or by the Planning Inspectorate on Green Belt land contrary to national and local planning policy.

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 275,000, an increase of 25% on the previous year, and almost double the number of homes proposed on Green Belt under Labour's unpopular regional plans - one of the key reasons why Greg Clark's predecessor Eric Pickles abolished them.

The Prime Minister claimed in 2015 that development on Green Belt was at its lowest rate for 25 years.⁶ CPRE's analysis shows this claim has been very short-lived. Despite cross-

¹ CPRE, [Green Belt under siege](#), March 2015

² [Conservative Party manifesto](#), 2015, p. 52

³ CPRE, [Election special: Andrew Motion quizzes the leaders](#), April 2015

⁴ CPRE, [60th anniversary poll shows clear support for Green Belt](#), 2 August 2015

⁵ Local Plans Expert Group, [Report to the Communities Secretary and Minister of Housing and Planning](#), March 2015

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

| Date | Housing proposals ⁷ | Commercial land |
|-----------------------------|--------------------------------|-----------------|
| 2009 (draft regional plans) | 147,000 | n/a |
| August 2012 | 81,000 | 1,000 ha |
| August 2013 | 150,000 | 2,100 ha |
| March 2015 | 219,000 | 2,000 ha |
| March 2016 | 275,000 | 2,190 ha |

Flawed proposals

Green Belt boundaries are now being changed to accommodate housing at the fastest rate for at least two decades. In the year to March 2015, according to the most recent Government statistical bulletin, 11 local planning authorities signed off boundary changes to accommodate development. Much more is in the pipeline. In all but one region of England the figures show that an increasing number of houses are planned in the Green Belt (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 more than tripled since August 2013.

Planning inspectors have signed off major releases of Green Belt for development around cities even though there is ample brownfield land available within urban areas. These include Cheshire West & Chester and Knowsley, following earlier releases approved in Leeds and Newcastle/Gateshead.

The Government's own statistics show that in 2014/15, 346 ha (or 7% of all land changing to residential use) of Green Belt land changed to residential use. This is the highest annual figure since 1990. (The percentage has only been higher in one year, at 8% in 2013/14.)⁸ Given that only 13% of the country is covered by Green Belt, the fact that 7% of land changing to residential use happens in Green Belts suggests that the 'exceptional' and 'very special' circumstances tests are not in practice the high bar suggested by the Government's stated commitment.

Research by consultancy Glenigan in June 2015 for BBC Radio 4's *File on 4* also found a sharp increase in the number of houses securing full planning approval in the Green Belt. In 2009/10, 2,258 homes were approved. By 2014/2015, it had risen to 11,977.⁹ This is a five-fold increase in five years.

Under pressure to set and then meet high and often undeliverable housing targets, councils are using the "exceptional circumstances" caveat in the NPPF to de-designate Green Belt land for housing development. While the Government has issued guidance, based on an earlier Ministerial statement by Brandon Lewis, stating that housing targets in themselves should not justify giving planning permission on Green Belt land, the guidance is much more equivocal in relation to identifying land for housing requirements in local plans.¹⁰ This loophole needs to be closed.

The Government is currently considering responses to its December 2015 consultation on changing the NPPF. Among the numerous proposals in the consultation are suggestions to promote "starter homes" on small sites in the Green Belt, and to make it far easier for intrusive development to take place on brownfield sites within the Green Belt. While CPRE generally supports the redevelopment of brownfield sites, the current policy enables councils to manage the impact of brownfield redevelopment on the openness of the Green

⁶ The Daily Telegraph, [David Cameron: I am a countryman and I will protect the Green Belt](#), 2 March 2015

⁷ After 2012, most of these are in draft or approved local plans, but the 2016 total also includes a further proposal (for 20,000 houses on the edge of London) endorsed by the Government's National Infrastructure Commission.

⁸ DCLG, [Land Use Change Statistics in England: 2013/14](#), August 2015.

⁹ BBC News online, [Building on greenbelt land has soared over five years](#), June 2015.

¹⁰ [Housing and economic land availability assessment](#), Planning Practice Guidance, paragraphs 034, 044 and 055.

Belt, something that is particularly important when many such sites in the Green Belt comprise attractive or modest buildings set in open grounds.

Conclusions

- Houses planned on Green Belt land are at the highest point since the advent of the Government's flagship planning policy - at 275,000
- Green Belt policy is gradually being weakened, and new proposals would mean that it is weakened further
- The Government must strengthen national planning and land use policy in line with its commitments

Recommendations

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

- abandon proposals to relax Green Belt policy and make it clearer that unnecessary or major losses of Green Belt should be avoided
- 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
- reduce pressure on the Green Belt by empowering councils (local planning authorities) to prioritise the use of brownfield sites

CPRE, April 2016

GREEN BELTS UNDER THREAT APRIL 2016

Black text: Buildings proposed on Green Belt same as March 2015

Orange text: Buildings proposed on Green Belt, which are an increase on March 2015

Red text: New areas under threat, which had no proposals to build on Green Belt in March 2015

North West & Stoke on Trent Green Belts:

1. Blackburn with Darwen: 810 dwellings
2. **Bolton: 80 ha warehousing**
3. **Cheshire: 6,280 new dwellings and 61 ha other development**
4. **Lancaster: 810 dwellings**
5. Knowsley: 3,250 dwellings and 42 ha warehousing
6. Manchester / Tameside: Airport City (430 ha) and Green Belt review
7. Sefton: 5,700 dwellings plus 46 hectares warehousing
8. St Helens: 155 ha freight terminal
9. West Lancashire: **1,600 dwellings** plus 20 hectares total warehousing and university expansion
10. **Rossendale: 574 dwellings**

North East:

1. Newcastle: 6,000 dwellings
2. Northumberland: 2,000 dwellings
3. South Tyneside and Sunderland: 20 ha warehousing
4. **Durham: 3550 dwellings**

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: 400 ha of warehousing**
7. **Kirklees: 4,600 dwellings**
8. **Doncaster: 1,500 dwellings**

Nottinghamshire:

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

Cambridgeshire:

1. **2,385 dwellings** and 8.0 ha of offices and warehousing

West Midlands:

1. Birmingham Airport: expansion and new interchange station
2. Birmingham: 35,000 dwellings around the city and **80 ha of other development**
3. Warwick: 550 dwellings
4. **Rugby: 1,500 dwellings and 28 ha of warehousing**
5. **Coventry: 6,600 dwellings**
6. **Solihull: 520 dwellings**

Metropolitan Green Belt:

1. Bedfordshire: 13,000 dwellings; 121 hectares freight terminal and warehousing
2. Berkshire: 1,200 dwellings in Windsor and Maidenhead
3. Buckinghamshire: Expansion of Pinewood Studios 44.5 ha; HS2 route; review in South Bucks;
4. Essex: 9,100 dwellings & 11 ha other development in Basildon; 2,900 dwellings in Brentwood; 2,200 in Castle Point; 1,250 in Epping Forest district; 2,785 in Rochford
5. **Hertfordshire: 42,123 dwellings across Dacorum, Stevenage, North Herts, East Herts, St Albans, Broxbourne and Welwyn Hatfield districts; 146 ha rail freight terminal**
6. **Kent: 450 dwellings near Sevenoaks**
7. **Redbridge: 2,000 dwellings**
8. **Surrey: 20,200 dwellings across Guildford, Reigate and Banstead, Runnymede, Tandridge and Woking; hotel and golf course; 158.7 ha other development**
9. **Thurrock: Preferred route of East Thames Crossing**
10. **20,000 dwellings as part of business case for Crossrail 2**

South West:

1. Avonmouth - Bridgwater: New pylons
2. Bath and North East Somerset: 950 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

