![CPRE logo] **CPRE** The countryside charity
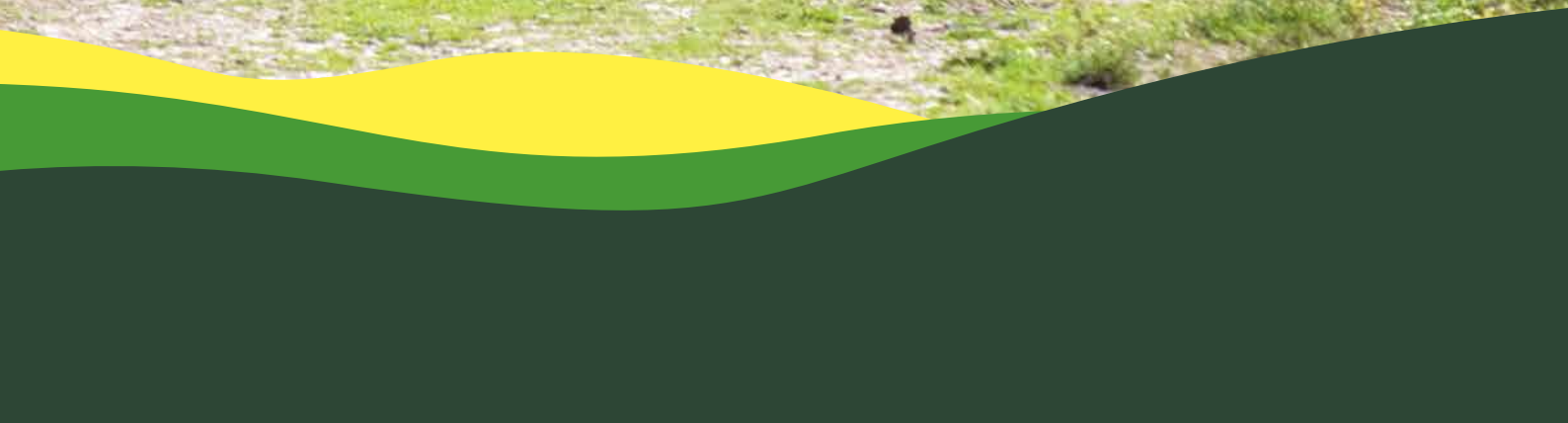
State of the Green Belt 2023

A vision for the 21st century

August 2023

Contents

Executive summary

The primary purpose of Green Belt policy in England, as set out in the National Planning Policy Framework (NPPF), is to prevent urban sprawl by permanently maintaining open land around the largest and the most historic towns and cities. The policy also encourages housing to be directed towards urban and brownfield sites near to where we work and the amenities we need. This report from CPRE, the countryside charity, highlights the level of changes to Green Belts that have taken place since 2009, and which are expected in the coming years.

The land protected by Green Belt policy covers 12.6% (or 1.6 million hectares) of England's land area and is the countryside next door for approximately 30 million people living in our largest towns and cities. With a high concentration of public rights of way, this land is particularly valuable for those living in the surrounding areas. Just over a quarter of Green Belt land is already covered by public funding encouraging more beneficial land use. In 2015 the Natural Capital Committee recommended creating over 350,000 ha of new woodland and wetland on Green Belt and other land around towns and cities. CPRE wants to see an increased targeting of land management funding to Green Belt land to help deliver the NCC recommendation. We also believe that it is critical that the commitment to the permanence of Green Belts is maintained in planning policy, with alterations only taking place in exceptional circumstances.

Green Belt policy continues to be effective in preventing urban sprawl, but according to national statistics, the rate of development in Green Belt land is significantly higher than in protected landscapes of National Parks and Areas of Outstanding Natural Beauty. We estimate that the rates of development of both current and former (as of 2009) undeveloped greenfield Green Belt land are between 6,000 and 10,000 houses per year. In addition, at least 37,000 houses (or just under 3,000 per year) have been developed on brownfield or previously developed sites within the Green Belt since 2009.

Further change is proposed to current Green Belt boundaries, mainly in order to accommodate housing development. There are currently 84,500 houses proposed on land to be removed from the Green Belt in adopted local plans and 123,400 proposed in advanced emerging local plans, amounting to just under 208,000 houses in total. The total figure is lower than the number of homes proposed for land released from the Green Belt in our State of Green Belt 2021 report (257,944), but since 2021 further proposals for Green Belt release to allow the building of an additional 25,000 houses have come forward in new, advanced local plans. Alongside this, substantial amounts of land that had been in the Green Belt in

2009 has been de-designated and brought forward for development. Most if not all of this development is not captured in national statistics that record rates of development in the Green Belt.

Furthermore, developments in the Green Belt are land-hungry and are not providing the affordable homes we need to face the housing crisis. The majority of developments are on land which was previously greenfield. Our analysis of thirteen recently approved and developed Green Belt projects shows that only 5% of the housing built was social housing, and consistently less affordable housing overall was provided than was called for by local planning policy. In other areas, conversely, local planning policy is also not providing support for sensitively designed rural exception schemes consisting primarily of affordable homes in Green Belt areas, despite this being supported by the National Planning Policy Framework (NPPF). In light of the proposed NPPF changes, it is possible that the amount of proposed Green Belt releases will reduce, but we expect the overall rates of development to remain the same or increase; the government continues to allow planning appeals based upon its current method for calculating housing need and supply.

CPRE recommends that the government should:

- Include commitments within its proposed Land Use Framework to use planning, farming and forestry policies and programmes in an integrated way to protect and enhance the countryside (including but not limited to designated Green Belt land) close to where people live, particularly in and around our largest towns and cities.

- Aim for at least half of all designated Green Belt land to be covered by agreements under its new Environmental Land Management schemes (ELM); with as much coverage of ELM-related agreements in the individual Green Belts in the midlands and north of England as there is in the Green Belts in southern England.

- Require developers to use suitable urban brownfield sites before greenfield land in Green Belt land and allow local authorities to set policies prioritising urban regeneration and the development of brownfield land. Speculative proposals for unsuitable greenfield housing developments not allocated in plans, should generally not be permitted.

- Publish supporting planning practice guidance, underpinned by publicly available and regularly updated data on building rates for large development sites. These can help prevent unnecessary development of Green Belt sites, and also allow the public to see whether the claims made by developers to support Green Belt release have been justified in practice.

- Implement the recommendations of Sir Oliver Letwin's Independent Review of Build Out Rates (2018), specifically giving powers to local planning authorities to shape large new housing developments, and insisting on higher levels of new social houses than are currently being provided.

Introduction

The countryside near to where people live has never had a greater test of its importance to people's health and wellbeing than during the coronavirus pandemic. Since the first lockdown over three years ago in 2020, there has been a surge in appreciation for the countryside, and the positive role that accessing green and natural spaces can have on our physical, mental and social wellbeing. The pandemic also highlighted the inequalities of access to good quality green spaces, with those living in deprived areas, minority ethnic groups and people living with disabilities for example less likely to have such access.

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Green Belt is the countryside next door for approximately 30+ million people living in our large towns and cities. One of the primary roles of the Green Belt is to maintain the openness of the countryside, and it encourages housing to be located near places where we work and the amenities we need. However, the potential of this land is much greater than this. Green Belt provides a vital space for nature and recreation and includes a significant number of our nature reserves, as well as double the national density of public rights of way. (The average public rights of way density is 20 metres per hectare (m/ha) in Green Belt areas, which is significantly higher than for England as a whole (8 m/ha)).[1] Through the protection and enhancement of Green Belt, we can increase the natural and recreational value of this land, as well as providing a natural solution to the climate emergency through its ability to sequester carbon.

Crucially, the defining feature of countryside which is designated as 'Green Belt', is its permanence; the assurance that it will remain for generations to come to reap the benefits. The NPPF formalises this commitment by stating that development in the Green Belt or the alteration of Green Belt boundaries should only occur under 'very special' or 'exceptional' circumstances respectively and should be managed through the Local Plan process.

CPRE, led the campaign for the creation of the Green Belts, a term first coined by English reformer, Octavia Hill, in 1875. To date, they have been a great success in terms of protecting the countryside near to many of our towns and cities and reducing the damage of urban sprawl to both people and the environment. However, Green Belts continue to be threatened by development, decreasing the ability of this land to provide for nature, assist in combatting the impacts of climate change, and enable access to green spaces.

As set out in section 13 of the National Planning Policy Framework (NPPF), the fundamental aim of Green Belt planning policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt areas are their openness and their permanence.

We believe that many more affordable homes need to be built, especially in rural areas. Not all Green Belt areas are necessarily rural, but nonetheless there are rural communities in need that are surrounded by Green Belt. The determination of a local authority's housing supply requirement should, essentially, determined on the basis of locally assessed need. CPRE believes that the best available data should be used for land use planning decisions and currently this means the Census 2021 data, collated two years ago, verified and published. The Office of Statistical Regulation has stated that older 2014 data ought not to be relied upon for land use planning decisions in the future, although government planning practice guidance perversely continues to encourage use of the older data.

This report by CPRE investigates past and future proposals for development on Green Belt including greenfield land. It shows that large-scale house building in the Green Belt is not the answer to the housing crisis, and instead recommends investment to protect, preserve and enhance it for the enjoyment of communities today and tomorrow.

[1] 3 CPRE (2016), Our Green Belt: worth investing in: www.cpre.org.uk/resources/our-green-belt-worth-investing-in/.

Benefits of the Green Belt

Green Belts provide a wide range of public benefits

As we saw in during the lockdowns of the coronavirus pandemic, people increasingly valued the importance of green spaces for their mental, social and physical wellbeing and England's Green Belt plays a very important part in this. As we have stated earlier, the Green Belt is the countryside next door for 30+ million people therefore it must be noted how important having access to Green Belt land is. The People and Nature Survey by Natural England noted how since the COVID-19 pandemic, 38% of people felt that nature was more important to them than ever and 41% of people felt that visiting local green and natural spaces was even more important to their wellbeing. Better management of the Green Belt will provide opportunities for a particularly large section of the population to interact with green space, nature and cultural heritage.

Food and Farming

65.6% of Green Belt land is registered as agricultural land. Green Belt agricultural land has the potential to provide local farm produce to the many urban areas within the Green Belt, improving food security, reduction of food miles and self-sufficiency. Just over a quarter (28%, or 310,000 ha) of all the utilisable farmland in the Green Belts is covered by agri-environment schemes that aim to improve the value of farmland for nature and for public access. CPRE is calling for this coverage to be effectively doubled so that over half of all Green Belt farmland is covered by such schemes.

Climate Change

CPRE supports the Natural Capital Committee's 2015 recommendation to create 350,000 hectares overall of new woodland and wetland close to urban areas. Green Belt land will be the obvious place for most of this new habitat, and our local group in London is leading calls for a new M25 of trees to provide a ring around the city. Especially in cases where new woodland and wetland is created, Green Belt land can provide critical absorption and interception abilities when dealing with heavy rainfall and resultant flooding. Green Belt land encompasses the sixteen largest urban cores of England. The Green Belts are already a massive part of our green infrastructure network. They bridge the gap between the natural environment and the built environment in urban areas and help to lessen and otherwise mitigate the urban heat island effect. Undeveloped Green Belt land includes both significant areas of deciduous woodland (140,000 ha or 19% of the national total) and flood plain (around 130,000 ha), as well as further scope for carbon sequestration and reduction through the planting and retention of mature woodland, standing grassland and peatland.

Map 1.
A map showing the fourteen Green Belts that surround the 16 urban cores across the country. Data source: Esri UK.
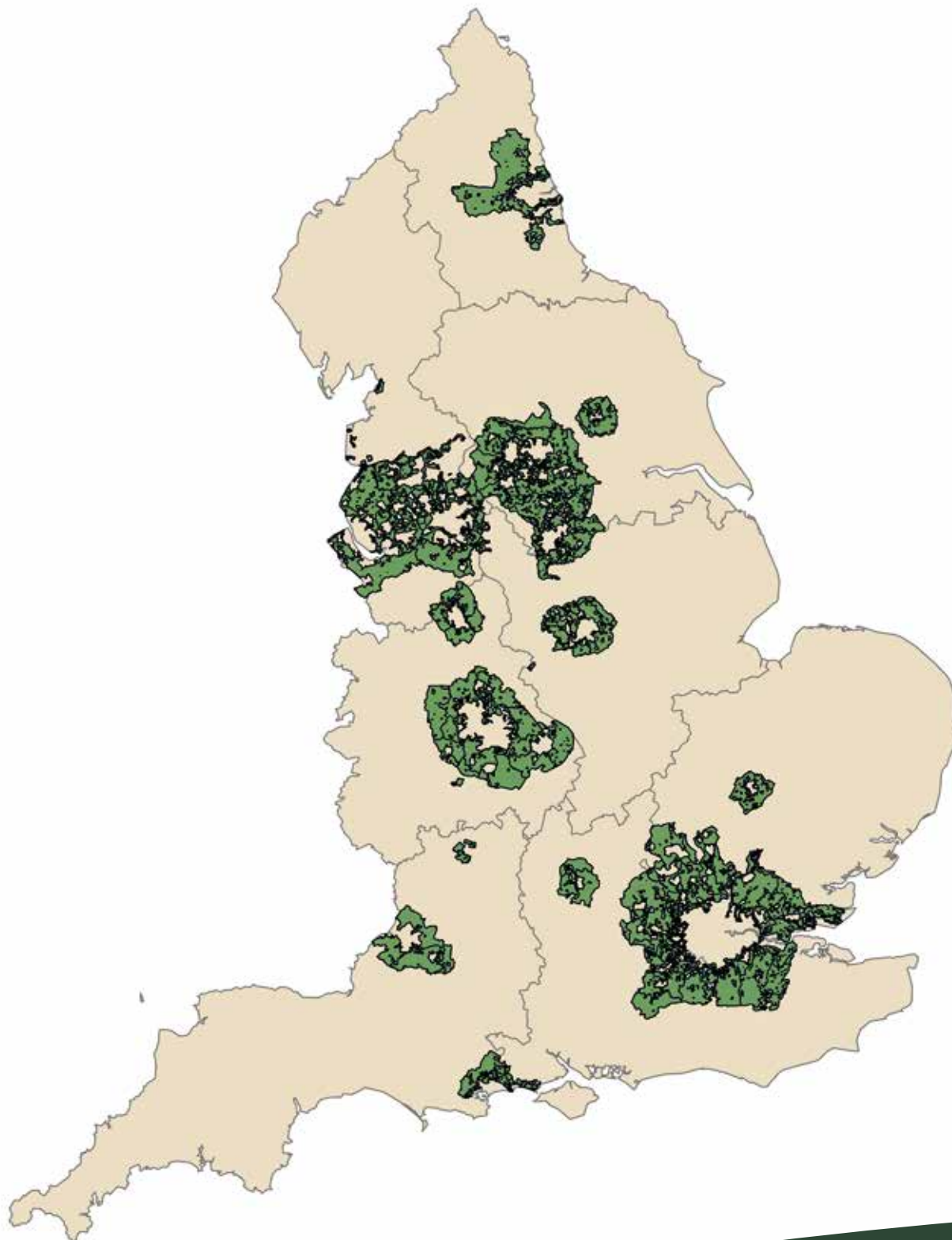
Analysis

2.1 Applications on land within the Green Belt

Applications on land within the Green

Since 2009, on average approximately 220 planning applications have been submitted every year for large housing developments within the Green Belt. Since 2013/14, with one exception in 2020/21 at the height of the coronavirus pandemic, the number of applications has been above this average. (Charts 1 and 2.)

> CPRE commissioned research by Glenigan, a construction industry research consultancy, outlined in the following tables and charts.

Chart 1.
Number of residential planning applications for projects on Green Belt by type of site. Data source: Glenigan.
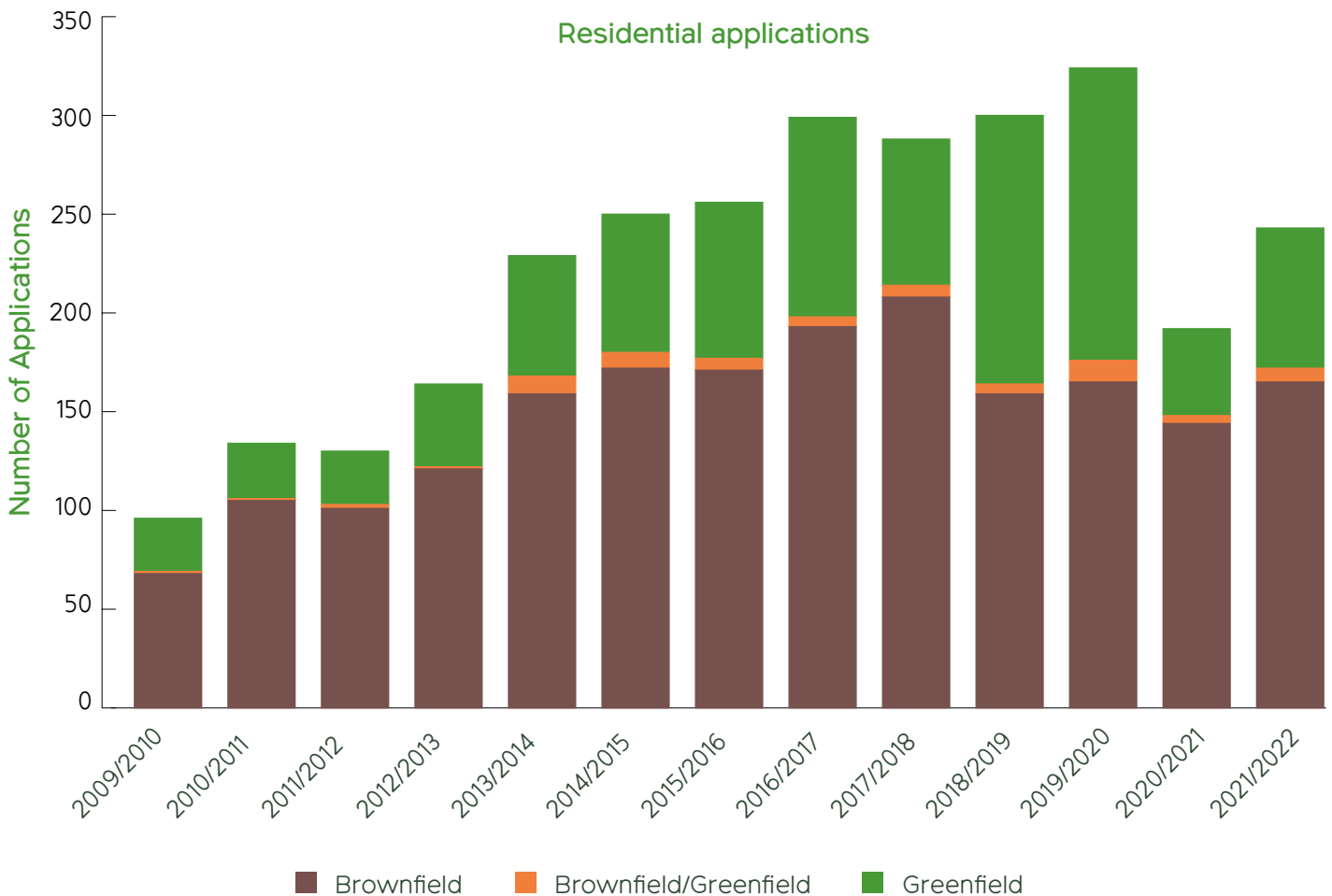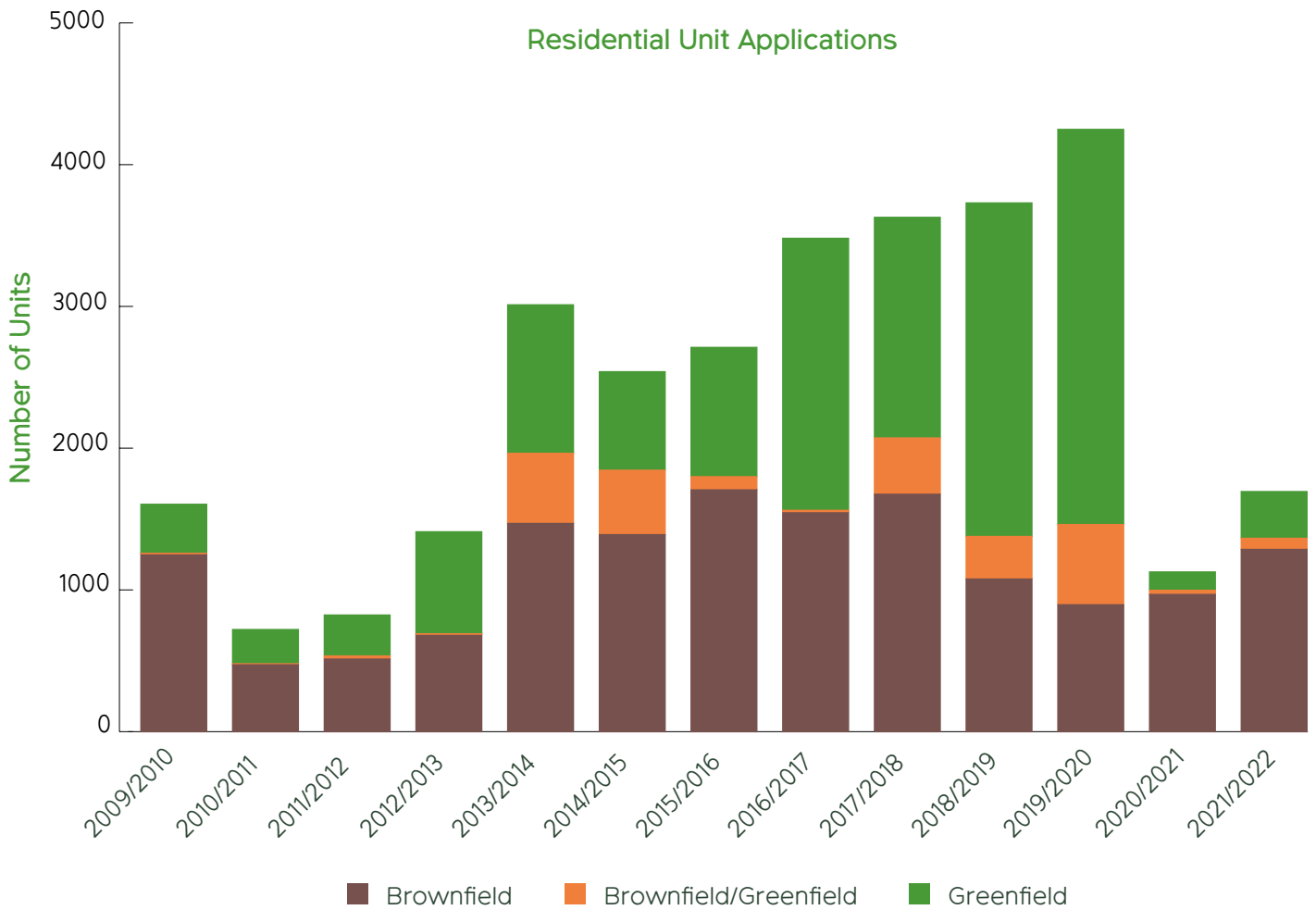

Residential applications

Number of Applications

| Brownfield | Brownfield/Greenfield | Greenfield |

Residential Unit Applications

Legend: Brownfield · Brownfield/Greenfield · Greenfield

As seen in Table 1, the number of homes approved between 2009/10–2021/22 was:

- 67,800 on greenfield land in the Green Belt
- 69,100 on brownfield land in the Green Belt
- and 3,000 on mixed sites of both brownfield/greenfield

Table 2 shows that approximately 33,000 houses have been completed on greenfield Green Belt sites, and 37,000 on brownfield Green Belt sites, over the same period.

In nine out of the past fourteen years, more houses have been completed on brownfield sites within the Green Belt than on greenfield sites. But in the most recent two years, the proportion on greenfield sites has been considerably higher than on brownfield.

To some extent the increases in greenfield housing development have been offset by a reduction in the levels of commercial and industrial development. (Tables 3 and 4.) Throughout the study period, commercial and industrial projects on brownfield and greenfield land in Green Belt have been consistent in approvals and completions. However, there has been a downturn in planning applications since the 2017/18 year caused by economic uncertainty and then the COVID-19 pandemic. Interestingly, alongside the pandemic and since the 2020/21 recovery of planning applications post-pandemic, completions on greenfield land have started to rise, whereas completions on brownfield sites have begun to fall, a distinct change when compared to figures from previous years.

Brownfield or previously developed land is defined within the NPPF as land that generally is or was occupied by a permanent structure, or already built on. Greenfield land, conversely, is land without any buildings or structures on it, usually farmland or woodland.

Table 1. Number of homes approved on greenfield, greenfield/brownfield and brownfield land within the Green Belt planning applications on Green Belt by type of site. Data source: Glenigan.

Year	Brownfield		Brownfield/Greenfield		Greenfield		Total Number
	Number	Proportion	Number	Proportion	Number	Proportion	
2009/10	2,676	78%	0	0%	733	22%	3,409
2010/11	3,258	63%	0	0%	1,899	37%	5,157
2011/12	4,343	64%	221	3%	2,261	33%	6,825
2012/13	5,204	72%	9	0%	2,001	28%	7,214
2013/14	8,348	54%	0	0%	6,995	46%	15,343
2014/15	5,801	65%	127	1%	2,944	33%	8,872
2015/16	11,044	61%	795	4%	6,336	35%	18,175
2016/17	4,178	34%	30	0%	7,946	65%	12,154
2017/18	6,699	39%	662	4%	9,727	57%	17,088
2018/19	4,824	38%	0	0%	7,887	62%	12,711
2019/20	1,284	23%	165	3%	4,100	74%	5,549
2020/21	7,358	45%	713	4%	8,203	50%	16,274
2021/22	4,109	35%	366	3%	6,796	60%	11,271
Total:	**69,126**	**49%**	**3,088**	**2%**	**67,828**	**48%**	**140,042**

Table 2. Number of homes completed on greenfield, greenfield/brownfield and brownfield land within the Green Belt planning applications on Green Belt by type of site. Data source: Glenigan

Year	Brownfield		Brownfield/Greenfield		Greenfield		Total Number
	Number	Proportion	Number	Proportion	Number	Proportion	
2009/10	70	100%	-	0%	-	0%	70
2010/11	203	45%	-	0%	253	55%	457
2011/12	302	85%	-	0%	53	15%	355
2012/13	886	60%	-	0%	597	40%	1,483
2013/14	1,323	63%	-	0%	774	37%	2,097
2014/15	2,238	61%	230	6%	1,183	32%	3,421
2015/16	4,041	51%	40	1%	3,874	49%	7,955
2016/17	4,208	46%	71	1%	4,821	53%	9,100
2017/18	4,807	62%	28	0%	2,964	38%	7,799
2018/19	6,973	62%	294	3%	4,032	36%	11,299
2019/20	8,161	55%	-	0%	6,644	45%	14,805
2020/21	1,763	32%	151	3%	3,624	65%	5,538
2021/22	2,063	32%	0	0%	4,352	68%	6,415
Total:	**37,038**	**52%**	**814**	**1%**	**33,171**	**47%**	**70,794**

Table 3. The number of commercial and industrial planning approvals by site. Data source: Glenigan

Year	Brownfield		Brownfield/Greenfield		Greenfield		Total Number
	Number	Proportion	Number	Proportion	Number	Proportion	
2009/10	118	80%	3	2%	26	18%	147
2010/11	138	79%	1	1%	35	20%	174
2011/12	162	85%	-	0%	29	15%	191
2012/13	170	79%	2	1%	44	20%	216
2013/14	165	82%	3	1%	33	16%	201
2014/15	161	77%	3	1%	44	21%	208
2015/16	187	81%	5	2%	40	17%	232
2016/17	208	78%	-	0%	60	22%	268
2017/18	187	82%	1	0%	41	18%	229
2018/19	141	74%	2	1%	47	25%	190
2019/20	88	81%	2	2%	18	17%	108
2020/21	74	65%	2	2%	38	33%	114
2021/22	67	73%	2	2%	23	25%	92
Total:	1,886	79%	26	1%	478	20%	2,370

Table 4. The number of commercial and industrial projects completed by site. Data source: Glenigan

Year	Brownfield		Brownfield/Greenfield		Greenfield		Total Number
	Number	Proportion	Number	Proportion	Number	Proportion	
2009/10	5	100%	-	-	-	-	5
2010/11	37	80%	1	2%	9	20%	46
2011/12	75	84%	1	1%	14	16%	89
2012/13	105	86%	-	-	17	14%	122
2013/14	112	80%	1	1%	28	20%	140
2014/15	103	84%	-	-	20	16%	123
2015/16	124	77%	2	1%	36	22%	162
2016/17	148	77%	2	1%	42	22%	192
2017/18	112	75%	2	1%	36	24%	150
2018/19	113	78%	1	1%	31	21%	145
2019/20	64	78%	-	-	18	22%	82
2020/21	36	59%	1	2%	24	39%	61
2021/22	29	66%	2	5%	13	30%	44
Total:	1,063	78%	13	1%	288	21%	1,361

As seen in tables 5 and 6, rates of development in the Green Belt are still relatively low in proportion to the land area it covers (12.5% of England), but conversely, they appear to be significantly higher than for protected landscapes such as AONB and National Park (24% of England but the overall development rate is quantitatively the same or lower). Also, as will be shown in section 2.2 below, government statistics do not show the rate of development of land that, prior to 2009 and the renewed spate of boundary changes, had been in the Green Belt.

| | Percentage | | |
Year	On previously developed land	On non-previously developed land	Proportion of all new residential addresses created
2017-18	50	50	3
2018-19	53	47	3
2019-20	43	57	3
2020-21	47	53	2
2021-22	51	49	2

Table 5.
The proportion of residential addresses created within land designated as Green Belt by previous land use.

Data source: Department for Levelling Up and Regeneration' to Department for Levelling Up, Housing and Communities (DLUHC)

| | Percentage | | |
| | Proportion of new residential addresses created on land designated as a National Park, an Area of Outstanding Beauty, a Site of Special Scientific Interest, or as Green Belt | | |
Year	On previously developed land	On non-previously developed land	Proportion of all new residential addresses created
2017-18	50	50	5
2018-19	52	48	4
2019-20	47	53	4
2020-21	51	49	4
2021-22	51	49	4

Table 6.
The proportion of new residential addresses created on land designated as a National Park, an Area of Outstanding Beauty, a Site of Special Scientific Interest, or as Green Belt

Data source: DLUHC

Case study:

Wirral Metropolitan Borough Council

Appellant: Leverhulme Estates
Number of homes: 788 dwellings (Phase One of 7,500 ambition)
Affordable Housing: 30% (proposed)

CPRE Cheshire, with the Wirral Society and some thirty local groups, which form an umbrella group 'Wirral Green Space Alliance' opposed the development of houses on farmland in the Green Belt.

WGSA considers the harms to Green Belt openness, landscape and visual amenity, ecology, and best and most versatile land clearly outweigh the benefits. One claimed benefit is affordable housing at 30%, but this is not guaranteed as the current rules allow developer viability to vary agreements.

The decision is considered premature in the context of the local plan, which is at examination. The submission local plan is focused on regenerating the former industrial and port areas, and it purposely proposes no Green Belt land release for housing. The evidence base demonstrated there is a sufficient amount of previously developed land to accommodate development requirements over the plan period. The National Planning Policy Framework's fifth purpose of Green Belt is to support urban regeneration and the Merseyside Green Belt was specifically tightly drawn to promote regeneration.

What is more, a development partnership has been established for the Regeneration of Birkenhead, with the Government, Liverpool City Region Combined Authority, Homes England, large strategic land holders/developers and local stakeholders from affordable housing providers, transport, health and education authorities working with the Council. The regeneration of the deprived areas is happening now, and there are plans to deliver affordable housing in locations people can afford them. There is genuine concern that more greenfield land being allowed for a significant amount of housing would jeopardize the regeneration ambitions. The examination is to resume in October following the inspector's decision scheduled for 2023.

2.2 Analysis of planned development

Removal of land from the Green Belt

Local plans are created by local authorities with a typical life span of fifteen years, with opportunity for community input to set the vision for development in their local area. Councils are required to review local plans every five years and, within them, are required to show that they have enough land to meet their housing targets for the next five years. In order to meet these targets, local authorities often remove land from the Green Belt designation. According to planning policy, this should only happen under 'exceptional circumstances', such as for a major urban extension or new settlements. However, from the results of this and previous reports, it appears that local authorities frequently release significant amounts of Green Belt for residential developments, raising the question of whether Green Belts are protected enough in planning policy.

For this analysis, we examined local plans that had reached a late stage of the plan-making process (pre-submission publication under Regulation 19 or later). We excluded proposals to release Green Belt land in local plans that had not reached that stage. We found that a minimum of 84,000 homes are planned on land that has been removed from the Green Belt in adopted plans. In 'emerging' or yet to be adopted local plans, an additional 123,400 homes are proposed on land to be removed from the Green Belt, giving a total of just under 208,000 homes. This figure is lower than the 257, 944 homes proposed on land to be removed from Green Belt in our State of the Green Belt report 2021. But with the number of additional houses proposed in emerging plans higher than that of the 2021 report (25,000) still means that further areas of Green Belt are set to be developed in future.

In addition, 2021/22 saw an increase of local authorities (14) changing their Green Belt boundaries, which is the second highest number of local authorities since between 2013/14-2021/22. The Planning Inspectorate reported that only 15 plans were adopted in 2022 and 16 in 2021, likely due to the effects of uncertainties around national planning policy changes. With a proposed new NPPF going through consultation earlier in 2023, some local authorities have paused their local plan making processes.

In addition, an increasingly large number of sites released from the Green Belt are now being built out. In 2021 Glenigan estimated that around 17,000 houses (at an annual average of 3,500) had been built on these sites. This time we have used Sir Oliver Letwin's Independent Review of Build Out (2018) to assist in understanding the proportion homes to be built out in Green Belt land that has been released from local plans that have been adopted since the introduction of the NPPF in 2012. The Review found that the median build out period for large sites was 15.5 years with the median percentage for site build out each year was 6.5%. Based on this we estimate (Table 9) that 31,200 houses (or 3,100 per annum over a 10-year period from the first adopted plan) had been built on released sites up to 2021.

The percentage proportions in the bottom row of Table 9 can be compared with the proportions reported in government statistics and reproduced in Table 5 above. The figures overall suggest that Green Belt policy continues to be highly effective. The detailed comparison suggests, however, that in terms of land that had been designated Green Belt in 2009, the rate of change due to development may now be almost twice as high as the government figures suggest.

Table 7.
The estimated number of homes proposed on land to be removed from Green Belt designation in local planning documents.

Data source: CPRE analysis of local plans May 2023. Note that figures are rounded down to the nearest hundred and the figures for 2019, 2021 and 2023 discount the numbers of houses already built on greenfield sites removed from the Green Belt in current local plans. The overall levels proposed in plans for these years are shown in brackets.

Status of local plan	Number of housing units – 2023 report	2021 report	2019 report	2017 report
Adopted plans, estimated yet to be built out	84,300	143,000	119,000	140,000
Emerging plans	123,400	97,900	145,400	64,000
Total	207,700 (303,500)	240,900 (257,900)	265,200 (266,000)	204,000

Table 8.
The number of local authorities changing Green Belt boundaries from 2013–2022.

Data source: Department for Levelling Up and Communities Local Authority Green Belt Statistics. 2021/22.

	2013/14	2014/13	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
Number of local authorities	3	11	8	8	10	13	15	11	14

Table 9.
Estimated proportions of housebuilding taking place on land that was designated Green Belt in 2009.

	2021	2019	2017	2015	2011
Number of housing units completed in England (DLUHC housing statistics live table 244)	174,940	177,880	162,480	142,740	114,020
Estimated lower range level of annual rate of housebuilding completions on greenfield land within the designated Green Belt (Glenigan figures unless stated)	6,700	4,100	9,700	6,300	600 (source: DLUHC Land Use Change Statistics)
Estimated upper range level of annual rate of housebuilding completions on greenfield land that was in the Green Belt in 2009 (annual completions in Green Belt added to estimated completions on land removed from the Green Belt)	9,800	7,600	10,100	6,300	600
Total estimated proportion (%) of all building that has taken place within 2009 Green Belt land	5.6	4.3	6.2	4.4	0.5

Gilston 'garden villages', Hertfordshire, East Herts Council

Applicant: Places for People (acting for Taylor Wimpey et al)
Number of units: 10,000 houses, extensive associated infrastructure, services and facilities
Affordable housing: 23% (reduced from original 40%)

The largest release of Green Belt in a Local Plan in England took place in October 2018 with the adoption of the East Herts Local Plan and the allocation of open countryside for 10,000 houses (covering approximately 1,000 hectares) for seven 'garden villages' north of Harlow, Essex. Negotiations have taken place since adoption of the Local Plan with agents acting for several developers and East Herts Council. This resulted in resolutions to grant outline permission for all 10,000 units subject to Section 106 obligations and conditions in February and March 2023.

However, the aspirations for the appropriate and sustainable development initially promoted are not being met by the developers' proposals to date. Little attention has been paid to the award-winning Hunsdon Eastwick and Gilston Neighbourhood Plan and local opposition to the proposals continues to grow. The developers' proposals include significant road and bridge building over the River Stort and the 'garden village' principles originally proposed are not being followed. Already, the originally proposed 40% affordable housing has been reduced to 23% by the developer due to viability concerns which are being challenged.

CPRE Herts campaigned from the beginning against the Local Plan Green Belt releases, together with local groups and individuals, but now accepts that the principle of development has been established by the Local Plan. The challenge for CPRE and local groups and individuals concerned is to achieve development which reduces significantly the impact on the countryside and the surrounding rural communities. Local groups and individuals have petitioned the Secretary of State to call-in the planning applications for his consideration due to the magnitude of the development and the inappropriate nature of the present proposals. Alternative less damaging proposals are being formulated, and notwithstanding the Secretary of State's decision, CPRE Herts continues to support more appropriate plans and designs.

2.3 Affordable Housing

Whilst there are thousands of new homes currently being built every year within the Green Belt, and hundreds of thousands more planned on current Green Belt land, many of them are simply unaffordable to local people. On sites where Glenigan recorded affordable provision, analysis suggests that just over a quarter of the housing on all approved sites fall within the government definition of 'affordable'. (Table 11.) But further investigation of site development gives a different picture.

	Number of homes on sites with approval that contain affordable housing	Number of homes on completed sites that contain affordable housing	Proportion (%)
On greenfield land within the Green Belt (2014/15-22/23)	14,150	3,982	28.1%
On brownfield land in the Green Belt (2014/15-22/23)	6,181	1,757	28.4%

Table 10. Proportion of affordable homes on planning applications within the Green Belt including greenfield / brownfield.

Data source: Glenigan/CPRE Analysis.

Research undertaken by CPRE, using the Compass appeals database and data provided by Glenigan, reviewed the affordable housing offer for 13 major planning applications (100+ homes) that had been allowed on appeal within the Green Belt across England. The 13 sites sit across a range of different local authorities and provided, on average (as a median), 279 homes, although 3 sites included over 1,000 homes. 4 of the sites have been fully built out, with 3 under construction, and the remaining 6 still to start on site.

In total, there were 7,112 new homes approved across all 13 sites of which, 2,097 homes were classed as 'affordable' (29%), a proportion close to that found in the wider Glenigan sample. The table overleaf provides a summary of the total number of homes and a breakdown of the types and number of affordable homes provided as a percentage of the total.

NB: We have included extra-care accommodation as a separate line within the table. This is because extra-care accommodation is generally unaffordable and not classed as an affordable housing product. However, some of the applications provided an element of extra-care accommodation within their affordable housing offer as an additional benefit but did not specify what proportion of the affordable provision would be provided as extra-care accommodation. Where this is the case the extra-care units have been included within the general affordable figures.

Table 11.
Breakdown of the total number and type of affordable homes provided across 13 major planning applications within the Green Belt.

Number of Homes		As a % of Total No. of Homes	As a % of Total No. of Affordable Homes (including extra-care accommodation)	As a % of Total No. of Affordable Homes (Excluding extra-care)
Total Number of Homes Approved:	7,112	100	N/A	N/A
Total Number of 'affordable homes' Approved (excluding extra-care accommodation):	2,097	29%	92%	N/A
Total Number of 'affordable homes' Approved (including extra-care accommodation):	2,272	31%	N/A	N/A
Total Number of Intermediate Homes Approved:	417	5.86%	18%	19.88%
Total Number of Social Rented Homes Approved (NB: Social rent was specifically referenced in the legal agreement/decision notice):	362	5.00%	16%	17.26%
Total Number of Affordable Rented Homes Approved:	537	7.55%	24%	25.60%
Total Number of General Affordable* Homes Approved:	743	10.44%	32.70%	35.43%
Total Number of 'First Homes' Approved:	38	0.53%	1.67%	1.81%
Total Number of Extra-care Accommodation** Approved:	175	2.40%	7.70%	8.34%

* Homes have been classed as general affordable where a specific tenure was not specified in the planning documentation publicly available.

** Where extra-care is specified as a separate 'tenure'. Other developments included extra-care housing within their social rent and intermediate provision.

There is no national policy requirement for affordable housing provision. However, the National Planning Policy Framework (NPPF) advises that planning policies and decisions should expect at least 10% of the total number of new homes delivered as part of a major development to be available for affordable home ownership (paragraph 65). Whilst the NPPF does not form part of the statutory development plan, it is a material consideration in the decision-making process and therefore, we have assumed the minimum policy requirement for affordable housing delivery across England should be 10%.

CPRE assessed the relevant local adopted planning policy for each of the 13 applications to understand whether there were local requirements for affordable housing provision over and above 10% and if the applications complied with this. Across the 13 local planning authorities, 11 had a planning policy requirement for 'affordable housing provision' within new residential developments, although one authority had a Local Plan that was afforded little weight at appeal due to the age of the policies and another only required 'an element of affordable housing on schemes of 15+ homes'. Therefore, these two authorities have been discounted on the basis that they do not have an adopted policy requirement. Taking an average of the affordable housing requirement within each authority's Local Plan, the overall policy requirement is for 34.5% (rounded up to 35%) of all new housing proposed to be 'affordable'. Several Local Plan policies also included requirements for 100% of all housing to be affordable on rural exception sites and/or greenfield land. Based on this the total affordable provision (29%) across all 13 sites to be released from the Green Belt is not in fact policy compliant.

Further, just over a third of the sites reviewed (4 schemes out of 11) did not meet adopted Local Plan policy (where Local Plans were in place) relating to affordable housing provision despite substantial weight being given to the delivery of housing, in particular affordable housing, in the planning approval/Inspectors Report. The primary reason given for this non-compliance was that the provision of any additional affordable housing would make the project unviable.

As noted above, there were two local planning authorities that did not contain a policy requiring affordable housing. There was an additional local planning authority that did have a policy in place, however the Local Plan was deemed to be out of date and was thus provided little weight by the Inspector at appeal. This meant that the local planning authorities had no ability to require applicants to deliver a minimum quantum of affordable housing on sites in their area.

On the sites that did provide an element of affordable housing only 5% of the overall housing provision (equivalent to 17% of the affordable element, excluding extra-care accommodation) was delivered as social rent. 25.6% of the total affordable housing provision was delivered as 'affordable rent', equating to 7.5% of the overall housing provision. In total, 12.5% of the overall housing provision (or 40% of the 'affordable' homes proposed) were delivered as affordable or social rent.

Additionally, the definition of affordable rent is inconsistent. In some legal agreements it is defined as being 'no more than 80% of local open market rents' and in others 'no more than 60% for a 1 bed or 55% for homes larger than 1 bedroom'. In many cases it is left to the prospective Registered Provider to define. This means that the actual affordability of these units can vary considerably, depending on local market conditions and the developer's agreement with the LPA and/or the Registered Provider of the units.

The largest proportion of affordable homes delivered were classed as 'general affordable' – 35.43% of the overall housing provision. Homes were classified as 'general affordable' where no information was given pertaining to the level of affordability of the proposed homes. Therefore, it could be argued that these homes are not actually affordable in some cases as there are no requirements for rents/house prices to be maintained at a certain level. This also poses questions relating to the transparency of the decision-making process, whereby planning committees and planning inspectors are approving applications based on the perceived public benefit of affordable housing delivery. However, as CPRE has discovered, the level and type of affordability of the proposed housing varies dramatically and in many cases is not genuinely affordable to people living in the local area.

The two case studies below are taken from the wider sample of 13 planning applications summarised above and provide further detail on the type of affordable homes offered, the level of planning policy compliance and reasons given for the planning approval.

Case study:

Hulton Park, Bolton Metropltan Borough Council

Applicant: Peel (L&P) Investments (North) Limited
No. of Homes Proposed: 1,036 dwellings
No. of Affordable Homes Proposed: 103 dwellings equating to 10%
Planning Policy Requirement: 35%

An application for outline permission for 1,036 new homes, alongside a new village centre, holiday accommodation, retail, leisure, and other recreational uses was submitted to Bolton Council in September 2021 (application reference: 12218/21) and subsequently refused by the planning committee on 28th February 2022. The decision notice stated 3 reasons for refusal: the adverse impact of the development on air quality and pollution, damage to the water courses including increased water pollution and inappropriate development in the Green Belt. The applicant's appeal was allowed, and planning permission granted, by a planning inspector in October 2022 (appeal reference: APP/N4205/W/22/3299644). The provision of housing, alongside ecological benefits and highways improvements was given considerable weight, and,

on balance, these perceived benefits outweighed identified harm to the Green Belt. The application only proposed to deliver 10% of the total number of homes as affordable. This was significantly below the requirements set out in the adopted Core Strategy (Policy SC1), which set an expectation for 35% of all new housing to be affordable, broken down into 75% for social rent and 25% for intermediate housing. However, the provision was considered acceptable by the planning officer due to the financial viability report submitted by the applicant demonstrating that the scheme could not 'viably deliver affordable housing'. Within the 10% affordable provision, the application proposed a tenure split of 65% social rented (67 homes) and 35% shared ownership (36 homes), which was also below the local planning policy requirement.

Case study:

Houghton Regis, Central Bedfordshire Council

Applicant: Bidwell West Consortium
No of Homes Proposed: 1,850
No of Affordable Homes Proposed: 185 homes equating to 10%
Planning Policy Requirement: 30%

A hybrid application for up to 1,850 homes, alongside a primary school and mixed-use employment land (retail, office, leisure uses) was submitted to Central Bedfordshire District Council in 2015. The site is located within the Central Bedfordshire Green Belt. However, the emerging Development Plan Document at the time of the application submission proposed a Green Belt boundary review. The joint-core strategy for Luton and Central Bedfordshire also identified land around Luton/Dunstable/Houghton Regis was identified as an area where development could take place. However, the strategy was withdrawn from the examination process and therefore held little weight in the decision-making process. Nevertheless, the application was approved in November 2015 and the site is now partially built-out.

Rural Exception Sites in the Green Belt

Rural exception sites are encouraged by the National Planning Policy Framework (NPPF) with the ambition of accelerating the provision of affordable housing in rural areas where housing tends to be very unaffordable. Rural exception site policies allow developments for affordable housing to come forward where they would not normally be granted permission due to other planning policies and constraints including the Green Belt, hence they are 'exception' sites.

Rural exception sites should meet local need, which is usually identified through a local housing needs survey. They can deliver any type of affordable housing, however the tenure and quantum of housing should be in line with the findings of the housing needs survey in order for the development to be justified. For example, in villages where there are very few 'starter homes' for young people a Rural Exception Site may be brought forward including First Homes to respond to the problem. Sites can also include an element of market housing if there is a demonstrable need. This has been utilised in areas where there is a proliferation of people under-occupying large, 'family' homes, but unable to downsize due to a lack of housing choice in the local area. Market housing for elderly people has also been provided on Rural Exception Sites alongside social/affordable rented properties.

When utilised and properly applied Rural Exception Site policy can deliver affordable homes for local people in appropriate places. However, the adoption and application of policies identifying where exception sites may be appropriate and the type of housing that should be provided has been fairly inconsistent in Green Belt areas. A review of the 13 Local Plans relevant to the 13 major applications assessed in the preceding section shows a mixed picture with only 5 of the 13 Local Planning Authorities having a relevant policy. This suggests that the rural exception site policy could be more widely taken up than it is currently by rural communities within Green Belt areas.

This case study has been provided by the Essex Rural Housing Enabler

Further information can be found at:
https://englishrural.org.uk/royal-opening-of-affordable-rural-homes-in-roxwell-essex/

One example of this is the Green Lane Rural Exception Site located in the village of Roxwell in Essex and delivered by English Rural. The scheme provided five new affordable houses for local people in perpetuity. In order to pay for the affordable homes the scheme also included two chalet bungalows sold at a discount of 25% of open market value to local people. The discounted rate also will remain in perpetuity if and when the properties are re-sold.

Roxwell village is home to around 1,000 people, however like many villages across England house prices have been rising at an exponential rate whilst wages have stagnated. This has meant that local people have been priced out of the area. To better understand the problem and local housing need the Essex Rural Housing Enabler (RHE) undertook housing needs surveys in 2012 and 2018, which indicated a need for around 20 households. RHE worked with the Parish Council to identify possible sites in the village for a small rural exceptions site. The preferred site at Green Lane was acquired and a planning application submitted in June 2018. Planning approval was granted in March 2019 and the construction of the homes by an Essex based contractor began later that same month. The homes were completed in February 2020 and will remain a vital asset to the local community in perpetuity through a planning (Section 106) agreement tied to the approval that also includes local connection eligibility criteria for each of the homes.

Conclusions and Recommendations

It is regularly argued that Green Belt restricts the building of the homes we need. But as we have shown in this report, developments in the Green Belt continue to be land-hungry, and for the most part lack the affordable housing that people actually need. At the same time, we are faced with a way of calculating housing need which will only increase the pressure faced by local authorities to build on Green Belt land rather than understanding how local needs for housing differ across the country. It is clear that we are faced with the prospect of our Green Belts continuing to be released for unsuitable housing, while swathes of land that has already been built on lies under-used and the housing crisis continues.

Rates of rezoning of, along with development on, Green Belt land remain relatively low, but they have increased substantially and consistently since the adoption of the NPPF in 2012, despite the government's commitment to the protection of Green Belt in 2010 as well as further restatements of that commitment since then. We can manage, restore and enhance our Green Belts to provide more space for nature and as a place to relax, play and grow our food. In order to deliver a positive future, we need to manage, restore and enhance our Green Belts to build the homes we need, provide more space for nature, and find places to relax, play and grow food.

CPRE recommends that the government should:

- Include commitments within its proposed Land Use Framework to use planning, farming and forestry policies and programmes in an integrated way to protect and enhance the countryside (including but not limited to designated Green Belt land) close to where people live, particularly in and around our largest towns and cities.

- Aim for at least half of all designated Green Belt land to be covered by agreements under its new Environmental Land Management schemes (ELM); with as much coverage of ELM-related agreements in the individual Green Belts in the midlands and north of England as there is in the Green Belts in southern England.

- Require developers to use suitable urban brownfield sites before greenfield land in Green Belt land and allow local authorities to set policies prioritising urban regeneration and the development of brownfield land.

- Encourage the development of small rural exception sites consisting entirely or primarily of affordable housing on the edge of villages within the Green Belt where these have local support and harm to the Green Belt is avoided or minimised. Otherwise, speculative proposals for unsuitable greenfield housing developments not allocated in plans, should generally not be permitted.

- Publish supporting planning practice guidance, underpinned by publicly available and regularly updated data on building rates for large development sites. These can help prevent unnecessary development of Green Belt sites, and also allow the public to see whether the claims made by developers to support Green Belt release have been justified in practice.

- Implement the recommendations of Sir Oliver Letwin's Independent Review of Build Out Rates (2018), specifically giving powers to local planning authorities to shape large new housing developments, and insisting on higher levels of new social houses than are currently being provided.

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Method

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 are 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 and Local Authority Green Belt Statistics.

CPRE The countryside charity