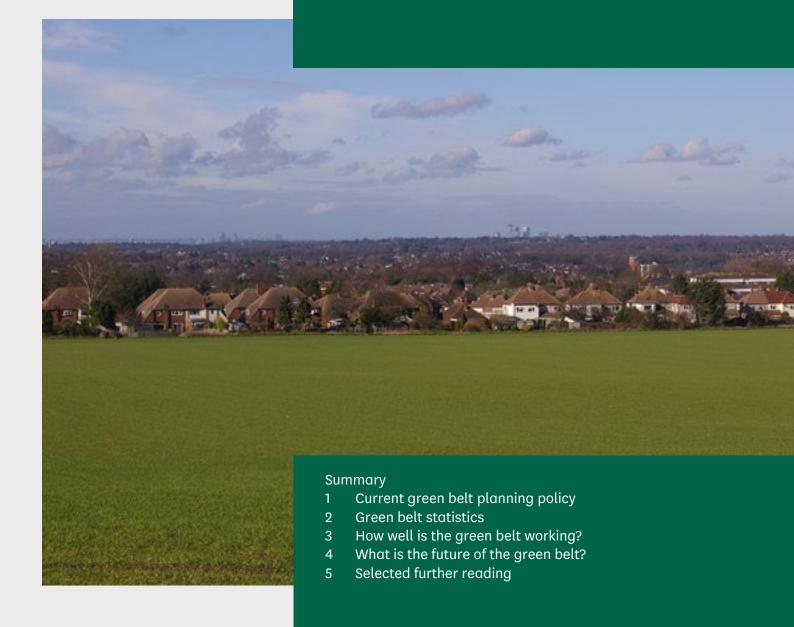


Research Briefing

15 December 2023

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Green Belt



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Summary

This briefing discusses green belt planning policy and some of the recent discussions around the green belt, including government proposals to strengthen green belt protections. It only covers England.

Green belt planning policy

The government states that the "fundamental aim" of the green belt "is to prevent urban sprawl by keeping land permanently open" around urban areas. It is for local planning authorities (LPAs) to define and maintain green belt land in their local areas. Government policy on the green belt is set out in chapter 13 of the National Planning Policy Framework (NPPF).

LPAs should set out green belt boundaries in their local plans. They can change the boundaries of green belt land in their area as part of the local plan review process. However, government guidance advises LPAs to only change green belt boundaries in "exceptional circumstances".

LPAs also decide planning applications on green belt land. Government guidance advises LPAs that, in general, development on the green belt is "inappropriate" and "harmful to the Green Belt". It provides that LPAs should allow development on the green belt only in "in very special circumstances".

Proposed changes to green belt planning policy

The government has proposed updating its guidance to make clear that LPAs are <u>not required to review and alter green belt boundaries</u> if building on green belt land would be the only way of meeting housing need. It consulted on the proposed changes between December 2022 and March 2023. At the time of writing, it has not yet responded to the consultation.

Green belt statistics

How large is the green belt?

England had around 16,384 km² (or 6,326 square miles) of green belt land at the end of March 2023, covering 12.6% of England's land area.

The green belt is clustered around 15 urban cores; the largest are London (5,085 km²), Merseyside and Greater Manchester (2,477 km²) and South and West Yorkshire (including Sheffield, Leeds and Bradford, 2,465 km²).

How much building has there been on the green belt?

An estimated 93.1% of the green belt was undeveloped land in 2022. This land was primarily used for agriculture (65.0% of all green belt land). 6.8% of green belt land was developed, with over half of this developed land accounted for by roads and other transport infrastructure. Residential buildings accounted for 0.3% of green belt land.

From 2019-20 to 2021-22, 71.5 km² of previously undeveloped green belt land changed to a developed use, of which 7.6 km² turned into residential use.

How well is the green belt working?

The Housing, Communities and Local Government Committee has noted that stakeholders are divided on whether the green belt should "never be built on" or constituted "an anti-growth mechanism" (PDF). Some commentators argue that green belt protections are too weak, and inappropriate development can encroach on the green belt. Others argue that the protections are too strong and that the green belt is a constraint on building enough homes.

For example, CPRE has argued that <u>building on the green belt could "not solve the crisis in affordable housing"</u>. In addition to preventing urban sprawl, CPRE and the London Green Belt Council have pointed to <u>other benefits of the green belt</u>, such as providing opportunities for public recreation.

On the other hand, think tanks such as the <u>Adam Smith Institute</u> and the <u>Institute of Economic Affairs</u> have argued that the release of (at least some) green belt land could help "solve the housing crisis". The <u>Centre for Cities</u> has suggested releasing green belt land within a short distance of train stations.

What's the future of the green belt?

Recent proposals to reform the planning system have once again brought the green belt to the fore. The government has proposed updating its guidance to clarify that LPAs are <u>not required to change green belt boundaries</u> to meet local housing need.

The proposed changes have been <u>welcomed by some</u>, <u>such as CPRE</u> and the London Green Belt Council. Others, such as the Home Builders Federation, have expressed concern, however, that <u>strengthening green belt protections</u> <u>would impact housing delivery</u> and the government's aim to build 300,000 new homes per year.

The Housing, Communities and Local Government Committee (now the Levelling Up, Housing and Communities Committee) has called for <u>a review to "examine the purpose of the Green Belt"</u>.

1 Current green belt planning policy

It is for local planning authorities (LPAs) to define and maintain green belt land in their local areas. The government expects LPAs to set out green belt boundaries in their local plans. LPAs can change the boundaries of green belt land in their area as part of the local plan review process.

1 What are local plans?

A local plan sets out an LPA's policies and priorities for development and land use in its local area. It identifies what development is needed, where it should go and what land is protected.

A local plan is drawn up by the LPA in line with the government's <u>National Planning Policy Framework</u> and in consultation with the community. Every local plan must also be examined by the Planning Inspectorate, an executive agency of the Department for Levelling Up, Housing and Communities.¹

1.1 Purpose of the green belt

The government's <u>National Planning Policy Framework (NPPF)</u> provides that "the fundamental aim" of the green belt "is to prevent urban sprawl by keeping land permanently open".² Specifically, it sets out that the green belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas.
- to prevent neighbouring towns merging into one another.
- to assist in safeguarding the countryside from encroachment.
- to preserve the setting and special character of historic towns.
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.³

Department for Levelling Up, Housing and Communities (DLUHC) and Ministry of Housing, Communities and Local Government (MHCLG), <u>Plan-making</u>, last updated October 2021

² DLUHC, <u>National Planning Policy Framework</u>, last updated September 2023, para 137

³ DLUHC, <u>National Planning Policy Framework</u>, last updated September 2023, para 138

1.2 Proposed development on green belt land

With certain exceptions, the NPPF states that development on the green belt should be regarded as "inappropriate" and "is, by definition, harmful to the Green Belt". The NPPF provides that LPAs should grant planning permission to development on the green belt only in "in very special circumstances". These "very special circumstances" exist only when the potential harm to the green belt is "clearly outweighed by other considerations".⁴

In reply to a parliamentary question in March 2022, the then Housing Minister, Stuart Andrew, sets out that these "very special circumstances" are not further defined in the NPPF to allow LPAs to "assess each case on its merits":

Very special circumstances are not defined in national planning policy as it is rightly for the individual local authority to assess each case on its merits, and give relevant circumstances their due weight. However, when considering any planning application affecting Green Belt land, the local authority should ensure that substantial weight is given to any harm to the Green Belt.⁵

A reply to a parliamentary question in September 2022, the Housing and Planning Minister, Lee Rowley, reaffirmed that LPAs should refuse development on the green belt except in "very special circumstances".

There is no ban on development on the green belt, however. In its response to its consultation on the revisions to the NPPE in July 2018, the government also said it had no plans for a national review of green belt policy or to completely ban development on the green belt.⁷

2 What role does the NPPF play?

The government's <u>National Planning Policy Framework</u> (NPPF) sets out the government's national planning policies. It provides a framework against which LPAs draw up their local plans and is also a 'material consideration' when LPAs determine planning applications for development.⁸

The NPPF was first published in 2012. Following a consultation, the updated NPPF 2019 was published in July 2018, and minor amendments were made in February 2019. Following another consultation, the NPPF was revised again in July 2021 and minor amendments were made in September 2023. The chapter on the green belt remained unchanged since 2019.

DLUHC, <u>National Planning Policy Framework</u>, last updated September 2023, paras 147-149

PQ 140431 [Batteries: Planning Permission] 15 March 2022

PQ 53431 [<u>Planning: Green Belt</u>] 21 September 2022

MHCLG, <u>Draft revised National Planning Policy Framework: Government response</u>, July 2018, Q31

⁸ DLUHC, <u>National Planning Policy Framework</u>, last updated September 2023

The NPPF sets out under which circumstances LPAs may consider granting planning permission to development on green belt. These include (but are not limited to):

- The provision of limited affordable housing for local community needs in line with policies set out in the local plan.
- Limited infilling, for example, in villages.
- The redevelopment of previously developed land if either of the following conditions are met:
 - The redevelopment will not have a greater impact on the openness of the green belt than the existing development.
 - Where the redevelopment would contribute to meeting an identified affordable housing need, it should not cause "substantial harm" to the openness of the green belt.⁹

In planning practice guidance on the green belt (July 2019), the government sets out which factors LPAs should consider when assessing the impact of development on the openness of the green belt. These include (but are not limited to) the visual impact of the development on the green belt, whether the land could be returned to its original or an improved state of openness and the degree of activity, such as traffic, the development will generate.¹⁰

3 How are planning applications decided? Who decides planning applications?

Planning applications for development are usually decided in line with the local plan for the area unless 'material considerations' indicate otherwise. There is no defined list of material considerations, but one important material consideration is the government's <u>National Planning Policy Framework</u>.

Most planning applications are decided by the LPA in the first instance. If an LPA refuses planning permission or does not decide an application within statutory time limits, an applicant has a right of appeal. On appeal, planning applications are usually decided by the Planning Inspectorate. In rare cases, the Secretary of State will intervene and decide a planning application.¹²

⁹ DLUHC, <u>National Planning Policy Framework</u>, last updated September 2023, para 149

DLUHC and MHCLG, <u>Green Belthttps://www.gov.uk/guidance/green-belt</u>, July 2019, para 1

Section 38 of the Planning and Compulsory Purchase Act 2004; Section 70 of the Town and Country.
Planning Act 1990

Sections 77 to 79 of the Town and Country Planning Act 1990

1.3 Changing green belt boundaries

The NPPF states that "the general extent of Green Belts across the country is already established". ¹³ However, LPAs can review and redefine the boundaries of green belt land in their area when they prepare a new local plan or update their existing local plan. LPAs may expand or remove land from the green belt to meet local planning needs they identify as part of this process. ¹⁴

The NPPF provides that "Green Belt boundaries should only be altered" in "exceptional circumstances". These will need to be "fully evidenced and justified" in local plans. The NPPF goes on to say that, prior to changing green belt boundaries, an LPA should "demonstrate that it has examined all other reasonable options for meeting its identified need for development". ¹⁵

Specifically, an LPA should examine whether policies in its local plan:

- make as much use as possible of brownfield sites and underutilised land.
- optimise the density of development and make effective use of land.
- are informed by discussions with neighbouring LPAs about whether they could accommodate some of the identified need for development.¹⁶

Where an LPA concludes that it is necessary to release green belt land for development, the NPPF provides that it should first release land which has been previously developed and/or is well-served by public transport.

The NPPF also advises LPAs to set out "ways which the impact of removing land from the Green Belt can be offset through compensatory improvements", for example, by improving the "accessibility of remaining Green Belt land". In planning practice guidance on the green belt (July 2019), the government sets out how LPAs can offset the release of green belt land and how they can secure compensatory improvements. 18

DLUHC, National Planning Policy Framework, last updated September 2023, para 139

DLUHC, National Planning Policy Framework, last updated September 2023, para 140

¹⁵ DLUHC, National Planning Policy Framework, last updated September 2023, paras 140-141

DLUHC, <u>National Planning Policy Framework</u>, last updated September 2023, para 141

DLUHC, <u>National Planning Policy Framework</u>, last updated September 2023, para 142

DLUHC and MHCLG, Green Belt, July 2019, paras 2-3

2 Green belt statistics

4 Summary

England has around 16,384 km² (or 6,326 square miles) of green belt land, clustered around 15 urban cores.

The green belt grew by 8.6 km² between March 2022 and March 2023 because of local planning authorities amending the extent of their land designated as green belt. In previous years, the extent of the green belt had reduced by an average of 24 km² per year because of this type of change in designation.

65% of green belt land is used for agriculture. 7% is developed.

An estimated 72 km² of previously undeveloped green belt land changed to developed use from 2019/20 to 2021/22, of which 7.6 km² was changed to residential buildings.

2.1 How big is the green belt?

The green belt in England was estimated to be 16,384 km² or 6,326 square miles at the end of March 2023. This is approximately three times the size of Norfolk, and equivalent to 12.6% of the land area of England.¹⁹

The extent of the green belt has changed over time. In 1979 the UK-wide green belt was 7,215 km². ²⁰ By 1997, the green belt in England had grown to cover 16,523 km². ²¹ In 2005, 473 km² of green belt land was re-designated to become the New Forest National Park. Since then, the size of the green belt has been relatively consistent. In March 2023, it was around 0.4% larger than it was in 2006. ²²

Changes in the estimated size of the green belt are mostly due to LPAs adopting new plans that alter the area of that authority's green belt. This typically results in relatively minor decreases in the size of the green belt.

DLUHC, <u>Local authority green belt: England 2022-23 – statistical release</u>, 12 October 2023

²⁰ HC Deb 28 July 1997 c47W

DLUHC, Local authority green belt: England 2022-23 – statistical release, Accompanying tables, 12 October 2023

DLUHC, Local authority green belt: England 2022-23 – statistical release, Accompanying tables, 12 October 2023

Between March 2013 and March 2021, the green belt had a net reduction in size of around 178 km² due to these changes, an average of 24 km² per year.²³

However, between March 2021 and March 2022 the green belt grew by around 242 km². 90% of this increase was due to the introduction of a new local plan in Northumberland, which defined detailed green belt boundaries for the first time where previously only a "general extent" had been identified.²⁴ Between March 2022 and March 2023 there was only a small change to the size of the green belt, growing by 8.6 km².

A further 26.4% of land in England is designated as either a National Park, an Area of Outstanding Natural Beauty, or a Site of Special Scientific Interest. This means that 37.4% of land in England (4,876 km²) is designated as either green belt land or one of these other designations. ²⁵

2.2 Where is the green belt?

The green belt is clustered around 15 urban cores. The table below shows the area of green belt associated with each urban core.

| Green Belt area by urban core, 2023 | | | | |
|-------------------------------------|------------|--|--|--|
| Urban core | Area (km²) | | | |
| London | 5,085 | | | |
| Merseyside & Greater Manchester | 2,477 | | | |
| South and West Yorkshire | 2,465 | | | |
| Birmingham | 2,266 | | | |
| Tyne & Wear | 986 | | | |
| Bath and Bristol | 716 | | | |
| Derby & Nottingham | 599 | | | |
| Stoke-on-Trent | 444 | | | |
| South West Hampshire | 351 | | | |
| Oxford | 345 | | | |
| York | 280 | | | |
| Cambridge | 261 | | | |
| Cheltenham & Gloucester | 62 | | | |
| Blackpool | 25 | | | |
| Carnforth, Lancaster & Morecambe | 15 | | | |
| Burton-upon-Trent and Swadlincote | 7 | | | |

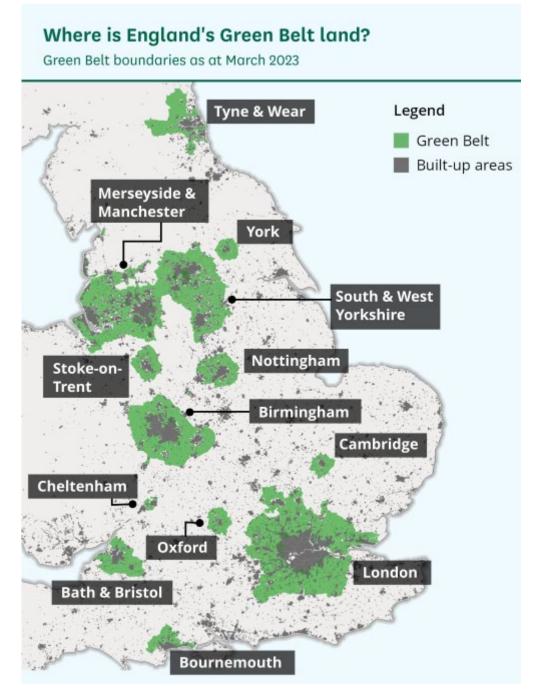
Source: DLUHC, Local authority green belt statistics for England: 2022-23, Table 4

²³ DLUHC, <u>Local authority green belt: England 2022-23 – statistical release</u>, Table 3, 12 October 2023

²⁴ DLUHC, <u>Local authority green belt: England 2021-22 – statistical release</u>, 12 October 2023

DLUHC, <u>Local authority green belt: England 2022-23 – statistical release</u>, Accompanying tables, 12 October 2023

The map below shows the location of green belt land, using boundaries accurate at the end of March 2023, published by DLUHC.



Source: DLUHC, English local authority Green Belt dataset, 2020/21 boundaries [Accessed 4 December 2023]

Contains OS data © Crown Copyright 2023

A number of detailed, interactive maps of green belt boundaries have been produced using DHLUC data, such as the government's <u>national map of planning data</u>.

5

6

Bromsgrove Brentwood

9 Windsor and Maidenhead

7 Guildford

10 St Albans

8 York

Full local authority and constituency data can be downloaded from the landing page for this briefing paper.

The table below shows the local authorities which have the highest proportion of green belt within their boundaries. Tandridge in Surrey has the highest proportion: 94% of its land is green belt. Epping Forest, Sevenoaks, and West Lancashire are all 90% green belt or more.

| Local authorities with the most Green Belt By percentage of total area, as at 31 March 2023 | | | | | | |
|---|-----------------|------------------|-----------------|--|--|--|
| | | Green Belt (km²) | % of total area | | | |
| 1 | Tandridge | 233.0 | 94% | | | |
| 2 | Sevenoaks | 343.9 | 93% | | | |
| 3 | Epping Forest | 308.3 | 91% | | | |
| 4 | West Lancashire | 310.1 | 90% | | | |

192.9

132.9

226.2

224.0

162.6

131.4

89%

87%

84%

82%

82%

82%

Source: DLUHC, Local authority green belt statistics for England: 2022-23, Accompanying tables

DLUHC has also produced estimates of the extent of the green belt in each parliamentary constituency in England. The table below shows the ten constituencies with the highest proportion of green belt.

Brentwood and Ongar, a constituency in Essex, has the highest proportion at 93%, followed by South Staffordshire, Sevenoaks and East Surrey (all 91%).

| Parliamentary constituencies with the most Green Belt By percentage of total area, as at 31 March 2023 | | | | | | | |
|--|---|-------|-----|--|--|--|--|
| | Green Belt (km²) <i>% of total area</i> | | | | | | |
| 1 | Brentwood and Ongar | 291.6 | 92% | | | | |
| 2 | South Staffordshire | 249.9 | 91% | | | | |
| 3 | Sevenoaks | 226.9 | 91% | | | | |
| 4 | East Surrey | 234.6 | 90% | | | | |
| 5 | Tonbridge and Malling | 270.5 | 90% | | | | |
| 6 | Bromsgrove | 192.9 | 89% | | | | |
| 7 | Chesham and Amersham | 173.8 | 89% | | | | |
| 8 | York Outer | 219.7 | 88% | | | | |
| 9 | West Lancashire | 231.1 | 88% | | | | |
| 10 | South Ribble | 169.6 | 86% | | | | |

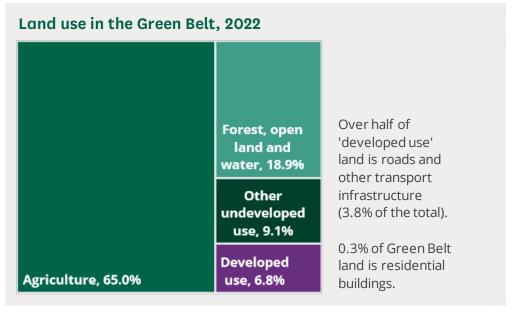
 $Source: DLUHC, \underline{Local\ authority\ green\ belt\ statistics\ for\ England: 2022-23}, Accompanying\ tables$

Full data can be downloaded from the landing page for this briefing paper, including data for the new constituency boundaries that will be used at the next general election.

2.3 Development in the green belt

DLUHC has published estimates of how land is used in the green belt. In 2022, 6.8% of Green Belt land was developed and 93.1% was non-developed uses.

- The most common non-developed use was agriculture, with agricultural land and buildings accounting for 65.0% of green belt land.
- Forest, open land and water accounted for 18.9%.
- Roads and other transport accounted for over half of all developed uses (3.7% of the green belt).
- Residential buildings accounted for 0.3% of green belt land.²⁶



Source: DLUHC, Land use in England, 2022, Table P401a

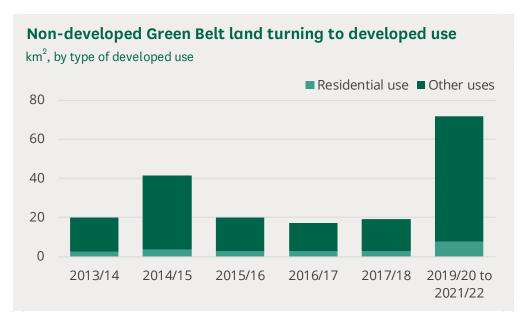
DLUHC has also published statistics on land use change in the green belt up to 2021/22. Data was not available for 2018/19, or available separately for the three years in the period from 2019/20 to 2021/22.

In total, 71.5 km² of previously undeveloped green belt land changed to a developed use category over the three-year period 2019/20 to 2021/22. This was more than triple the amount in any previous year since 2014/15, indicating that the yearly average over this period was higher. A further 24.3 km² of previously developed green belt land turned into another developed

²⁶ DLUHC, Land use in England, 2022, Table P401a, 27 October 2022

use category (for example, industrial sites becoming residential) between 2019/20 and 2021/22.

The chart below shows the trend in undeveloped green belt land changing to developed use in recent years.²⁷



Source: DLUHC, Land use change: hectarage 2019 to 2022, tables P380, P382, P383

10.6 km² of green belt land changed to residential use from 2019/20 to 2021/22. The majority (71%, or 7.6 km²) of this land was not previously developed.

²⁷ DLUHC, <u>Land use change: hectarage 2019 to 2022</u>, Tables P380, P382, P383, 24 August 2023

3 How well is the green belt working?

5 Summary

The question of whether the green belt is working well, which is often tied up with questions of how to meet the need for housing, can prove contentious. Some commentators have argued that the protections afforded by the green belt are too weak, and inappropriate development can encroach on the green belt. Others have argued that the protections are too strong and can get in the way of building sufficient housing and so limit growth.

3.1 Should the green belt be strengthened?

A <u>2010 report on the green belt</u> by Natural England and CPRE (formerly the Campaign to Protect Rural England) examined the history of the green belt, its protections and the state of the green belt. The report concluded that the green belt "continues to be highly effective in terms of its principal purposes of preventing urban sprawl". The report also highlighted other benefits of the green belt, including its ecosystem services and public access opportunities. The report called for "more ambition" to enhance green belt land.²⁸

In its <u>report on the state of the green belt</u> in August 2018, CPRE argued that building on the green belt could "not solve the crisis in affordable housing". CPRE argued that only 27% of the "homes approved on greenfield land" met the government's definition of "affordable" and that local authorities with green belt land had "enough brownfield land for over 720,000 homes".²⁹

CPRE published an updated <u>report on the state of the green belt</u> in February 2021. The report reiterated that developments on the green belt "are not providing the affordable homes we need to face the housing crisis". The report argued that the "current and future threat of housing development" on green belt land was "unprecedented".³⁰ In an article published in 2023, CPRE reiterated that the green belt should <u>not be viewed as "a limitation to building more homes</u>".³¹

²⁸ Natural England and CPRE, <u>Green Belts: A Greener Future</u>, 27 January 2010, page 90

²⁹ CPRE, <u>State of the Green Belt 2018</u>, August 2018, Executive Summary, page 2

CPRE, State of the Green Belt 2021, February 2021, Executive Summary, page 2

³¹ CPRE, What is the Green Belt, and why does it matter?, July 2021

What are the benefits of the green belt?

CPRE and other commentators have highlighted the benefits of the green belt. In addition to preventing urban sprawl, CPRE argued that green belt land was used for agriculture and thereby helped meet "local needs for food".³²

CPRE also highlighted that green belt land provided opportunities for "fresh air and exercise" which improved "health and wellbeing".³³ The London Green Belt Council, in its report <u>Safe under us? The continued shrinking of London's local countryside</u> (PDF, 2022), also highlighted that green belt land provided "crucially important [...] open spaces close to urban borders for public recreation", which were especially important during the Covid-19 pandemic.

In addition to providing opportunities for exercise and recreation, the London Green Belt Council argued that the green belt was important to "mitigating the effects of climate change" in "big crowded cities". ³⁴ Similarly, in a policy paper published in February 2020 (PDF), CPRE highlighted that the green belt played an important role in addressing climate and ecological emergencies. ³⁵

3.2 Is the green belt a constraint on housing?

Whether the same level of protection for the green belt remains appropriate or whether it places unnecessary limitations to the provision of new housing remains a topic of debate.

In its <u>2011 economic survey</u> (PDF), the Organisation for Economic Co-operation and Development (OECD) argued that the green belt was "a major obstacle to development around cities, where housing is often needed". It called on the government to "free up land for housing" and to replace the green belt with "land-use restrictions that better reflect environmental designations".³⁶

The Adam Smith Institute called for a "complete abolition" of the green belt in its <u>2015 report "The Green Noose"</u> to "could solve the housing crisis". As an alternative, it proposed "removing restrictions" on green belt land within a ten-minute walk of railway stations.³⁷ Similar proposals to develop land within a certain distance of railway stations were put forward by the Centre for Cities and the London Society.³⁸

³² CPRE, What is the Green Belt, and why does it matter?, July 2021

³³ CPRE, What is the Green Belt, and why does it matter?, July 2021

London Green Belt Council, <u>"Safe Under Us?" The continued shrinking of London's local countryside</u> (PDF), August 2022, Foreword, page 3

³⁵ CPRE, <u>Green Belt: CPRE's policy position</u>, February 2020, page 2

Organisation for Economic Co-operation and Development (OECD), <u>Economic Surveys: United Kingdom</u> (PDF), March 2011, para 19

Adam Smith Institute, <u>The Green Noose: An analysis of Green Belts and proposals for reform</u>, January 2015

³⁸ Centre for Cities, <u>Homes on the right track: Greening the Green Belt to solve the UK housing crisis</u>, September 2019; London Society, <u>London's Green Belt</u>, October 2014

A <u>2019 collection of essays</u> published by the thinktank the Institute of Economic Affairs argued that, although most green belt land should remain, any which did not achieve its purpose should be selectively reclassified:

Where green belt land achieves none of its official purposes, it can be selectively re-classified, with a presumed right to development. Most green belt land should remain, however. This proposal should apply in particular to derelict or already-developed sites. Green belt land near transport hubs should be a declassification priority, including Metropolitan Green Belt land within realistic walking distance of a railway station.³⁹

The property agents Savills has also suggested "loosening" restrictions on development on the green belt. In a <u>2020 article</u>, <u>Savills</u> proposed offsetting the loss of green belt land in one location by the designation of new green belt land elsewhere. ⁴⁰

How many homes could be built on green belt land?

In its <u>2015 report "The Green Noose"</u> the Adam Smith Institute argued that "removing restrictions" on green belt land within a ten-minute walk of railway stations to allow for the development of one million new homes.⁴¹

The Centre for Cities also argued that the release of green belt land within 800 metres of train stations which have a service of less than 45 minutes to major cities was one way of setting "the country on the right tracks for solving the housing crisis". In a 2019 report, the Centre for Cities argued that this would unlock "an estimated 47,000 hectares" of land and provide "enough land to increase the housing stock by 7 to 9 percent". 42

In a <u>2014 article on London's green belt</u>, the London Society said that "our towns and cities will each need, at some level to integrate with their green belts". ⁴³ With regards to London's green belt, it estimated that building one million new homes would cover less than 5 percent of the green belt:

Even if the current requirement for 1 million new homes over the next 15 years was built within it [London's Green Belt] ... it would require only 25,000 hectares, equivalent to 4.8% of the current area.⁴⁴

³⁹ Institute of Economic Affairs, <u>Raising the roof</u>, July 2019

Savills, Is Green Belt being used as effectively as it could be?, June 2022

⁴¹ Adam Smith Institute, <u>The Green Noose: An analysis of Green Belts and proposals for reform,</u> January 2015

⁴² Centre for Cities, Homes on the right track: Greening the Green Belt to solve the UK housing crisis, September 2019

London Society, <u>London's Green Belt</u>, October 2014

London Society, London's Green Belt, October 2014

4 What is the future of the green belt?

Since 2019, the government has put forward different proposals to reform the planning system in England and national planning policy. It has said reforms to the planning system are central to delivering a sufficient supply of homes and ensuring that "the right homes will be built in the right places".⁴⁵

Proposals to reform the planning system have once again brought the green belt to the fore. Some commentators have argued that the need for more housing will only be met if some development takes place on the green belt. Others have called for green belt protections to be strengthened.

6 Housing need and supply

In its <u>2019 election manifesto</u>, the Conservative Party committed to building 300,000 new homes per year by the mid-2020s and "at least a million more homes, of all tenures, over the next Parliament" (in other words, by January 2025 at the latest). ⁴⁶ The government has restated its commitment that target on a number of occasions since, most recently July 2023. ⁴⁷

The government has said that <u>new homes are needed to meet rising demand</u> for housing, which is in part the result of population growth. The government has also pointed to "a significant backlog [of people in need of homes] following years of not building enough homes". It has said that a failure to build enough homes had led to people living in "sub-standard or unsuitable homes". 48

234,400 new homes were supplied in 2022-23, a similar number to 2021-22. Housing delivery has been relatively stable in recent years, but delivery in 2022-23 was 79% higher than a low point of 130,600 in 2012-13.⁴⁹

For further information on housing need and supply, see the Library briefing <u>Tackling the under-supply of housing (England)</u> (May 2023).

DLUHC, <u>Levelling Up and Regeneration: Further information</u>, May 2022

⁴⁶ Conservative Party, <u>The Conservative and Unionist Party Manifesto</u> (PDF), 2019

⁴⁷ DLUHC, <u>PM to build 1 million new homes over this Parliament</u>, July 2023

Homes England, <u>Fact Sheet 1. The need for homes</u>, November 2023

⁴⁹ DLUHC, <u>Housing supply: net additional dwellings, England: 2022 to 2023</u>, 29 November 2023

4.1 Reforms: Levelling Up and Regeneration Act 2023 and proposed changes to the NPPF

The Levelling Up and Regeneration Act 2023, which received Royal Assent in October 2023, makes a number of changes to planning law. The Act followed the <u>'Planning for the Future' White Paper</u>, published in August 2020, in which the government had proposed "radical reform" to the planning system.⁵⁰

Separate to the changes it made to planning law through the 2023 Act, the government has also proposed changes to regulations, national policies and guidance. ⁵¹ It consulted on revisions to the NPPE between December 2022 and March 2023. At the time of writing (15 December 2023), the government has not yet responded to the consultation.

For further information about the 2023 Act and further reforms to the planning system, see the Library briefing <u>Planning reforms in England: Levelling Up and Regeneration Act 2023 and further changes</u> (December 2023).

Planning for the Future White Paper (2020)

In August 2020, the government published the <u>'Planning for the Future' White Paper</u>. In the White Paper, the government proposed "radical reform" to the planning system to make it "simpler, clearer, quicker to navigate". ⁵² Reforms the government proposed in the White Paper included:

- Placing land in three categories to streamline the planning process: growth areas "suitable for substantial development", renewable areas "suitable for some development" and protected areas. Green belt land would be classified as a protected area.
- Introducing "general development management policies nationally" and giving local plans "a more focused role" to reduce duplication.
- Establishing a nationally determined housing target that LPAs would be required to deliver. The target would account for land constraints, such as green belt land.⁵³

⁵⁰ DLUHC and MHCLG, <u>Planning for the future</u>, last updated January 2023; <u>Levelling-up and Regeneration Act 2023</u>

⁵¹ DLUHC, <u>Levelling Up and Regeneration</u>: Further information, May 2022

MHCLG, <u>Launch of Planning for the future consultation to reform the planning system</u>, Press release, 6 August 2020

MHCLG, <u>Launch of Planning for the future consultation to reform the planning system</u>, August 2020; DLUHC and MHCLG, <u>Planning for the future</u>, last updated January 2023

The White Paper stated that "the existing policy for protecting the Green Belt would remain".⁵⁴ The <u>press release accompanying the White Paper</u> confirmed that "decisions on the Green Belt will stay with local [planning] authorities".⁵⁵

The government <u>consulted on changes proposed in the White Paper</u> between August and October 2020. It did not respond to the consultation. Instead, it pointed to the Levelling Up and Regeneration Bill and accompanying reforms which, it said, were informed by responses to the consultation.⁵⁶ The Bill did not take forward reforms that would have placed land in three categories or establish a nationally determined housing target, however.

Levelling Up and Regeneration Act 2023

The Levelling Up and Regeneration Bill 2022-23 was published in May 2022 and received Royal Assent in October 2023. The Act incorporates some of the reforms proposed in the Planning for the Future White Paper. ⁵⁷

As proposed in the White Paper, however, the <u>Levelling Up and Regeneration Act 2023</u> introduced a new category of national planning policies: national development management policies (NDMPs). NDMPs will be drawn up by the Secretary of State for DLUHC. Once they have been designated, NDMPs will sit alongside local plans in decision-making. In case of a conflict between a local plan and an NDMP, the NDMP will take precedence over the local plan.⁵⁸

Anything that concerns the development or use of land in England could be the subject of an NDMP; the <u>Levelling Up and Regeneration Act 2023</u> does not place any restrictions on the scope and content of NDMPs. The government said that NDMPs will cover "general [planning] policies on issues that apply in most areas" in England, while local plans would be refocused to deal with "locally specific matters".⁵⁹

The government suggested that NDMPs would be derived from the policies currently set out in the NPPF, including that policies preventing inappropriate development on green belt land might become NDMPs. ⁶⁰ The government has also stated that NDMPs will ensure "important policy safeguards", such as policies to protecting the green belt, "will be upheld with statutory weight" even where local plans are out-of-date. ⁶¹

⁵⁴ As above, paragraph 2.26

MHCLG, <u>Launch of Planning for the future consultation to reform the planning system</u>, Press release, 6 August 2020

⁵⁶ DLUHC, <u>Levelling Up and Regeneration: Further information</u>, May 2022

DLUHC and MHCLG, <u>Planning for the future</u>, last updated January 2023; <u>Levelling-up and</u>
<u>Regeneration Act 2023</u>

Section 93 of the Levelling Up and Regeneration Act 2023

⁵⁹ Explanatory Notes to the Levelling Up and Regeneration Bill (HL Bill 84) 2022-23, para 57

⁶⁰ DLUHC, <u>Levelling Up and Regeneration: Further information</u>, May 2022

DLUHC, <u>Levelling-up and Regeneration Bill: Reforms to national planning policy</u>, December 2022, chapter 10, para 11

Proposed changes to the NPPF

Separate to the changes it made to planning law through the <u>Levelling Up</u> and <u>Regeneration Act 2023</u>, the government has also proposed changes to regulations, national policies and guidance. ⁶² It <u>consulted on revisions to the NPPE</u> between December 2022 and March 2023. ⁶³

In the consultation, the government proposed updating the NPPF to give LPAs greater flexibility to meet local housing need. It emphasised that the housing needs figure produced by the standard method (see box 7) was "an advisory starting-point to inform plan-making - a guide that is not mandatory".

One of the changes that the government proposed was amending the NPPF to state that LPAs are not required to review and alter green belt boundaries to meet local housing need in full. It proposed the change because requiring LPAs to review the green belt boundaries when preparing or updating their local plan had caused "confusion and often protracted debate". 64

The government has not yet responded to the consultation. It said that it would do so following the passage of the Levelling Up Bill, which occurred on 26 October 2023. In its response to the LUHC Committee's report published on 29 November 2023, the government said it would respond to the NPPF consultation "this autumn". 65

7 How is local housing need calculated in the planning system?

The NPPF provides a framework against which LPAs draw up their local plans. It expects LPAs to assess local housing need in their area using the 'standard method'. In their local plans, LPAs must then identify sites to deliver at least five years' worth of housing and set out policies to meet local housing need.

Whether LPAs have adequately assessed local housing need will be tested when their local plans are examined by the Planning Inspectorate, an executive agency of DLUHC. Every local plan is examined prior to adoption.

For further information about how local housing need is calculated in the planning system, see the Library briefing <u>Calculating housing need in the planning system (England)</u> (August 2021).

⁶² DLUHC, <u>Levelling Up and Regeneration</u>: Further information, May 2022

⁶³ HC Deb 6 December 2022 <u>WS415</u> [Update on the Levelling Up Bill]; DLUHC, <u>Levelling-up and</u>
<u>Regeneration Bill: reforms to national planning policy</u>, December 2022

⁶⁴ DLUHC, <u>Levelling-up and Regeneration Bill: reforms to national planning policy</u>, December 2022, chapter 7, paragraphs 4 and 9

⁶⁵ DLUHC, <u>Reforms to national planning policy report: Government response</u>, November 2023

4.2 Reaction to the proposed changes to the NPPF

The government said its reforms to the planning system would support planmaking, encouraging more LPAs to adopt local plans and keep them up-to-date. It said, in doing so, its reforms would "help deliver more homes". 66

Some commentators welcomed the government's proposed changes to the NPPF giving greater protection to the green belt. Others expressed concern that the proposed changes could affect housing delivery. They questioned whether the government's target of 300,000 new homes per year would be met if LPAs would be given greater flexibility to meet local housing need.

Support for strengthening green belt protections

CPRE and the London Green Belt Council (LGBC) expressed support for the proposed strengthening of green belt protections. ⁶⁷ CPRE argued that "the NPPF should not enable local authorities to release green belt land to meet local housing need". It called on the government to go further, however, to also strengthen green belt protections for other types of development. ⁶⁸

Concerns about the impact on housing delivery

In its <u>report on reforms to national planning policy</u> (July 2023), the Levelling Up, Housing and Communities (LUHC) Committee examined the changes to the NPPF the government proposed. The committee said it "heard evidence from many stakeholders" that the government's proposed changes to the NPPF "will render the national housing target impossible to achieve". ⁶⁹

For example, the HBF expressed concern that the proposed changes to the NPPF would affect the delivery of the 300,000 new homes per year target. It argued that meeting identified local housing need should "provide the exceptional circumstances required to release Green Belt". The law firm Freeths also criticised the proposed strengthening of green belt protections, arguing that the changes to the NPPF would offer a "political green light" to not meeting local housing need. The strength of the NPPF would offer a "political green light" to not meeting local housing need.

Research by planning consultancy Lichfields, commissioned by the HBF and the Land, Planning and Development Federation (LPDF), found that the revised NPPF could result in housing delivery falling by around 77,000 homes

DLUHC, <u>Levelling-up and Regeneration Bill: reforms to national planning policy</u>, December 2022, chapter 4, para 6

⁶⁷ CPRE, <u>National Planning Policy Framework consultation response</u>, March 2023; London Green Belt Council (LGBC), <u>LGBC response to NPPF consultation</u>, March 2023

⁶⁸ CPRE, National Planning Policy Framework consultation response, March 2023

⁶⁹ LUHC Committee, <u>Reforms to national planning policy</u> (PDF) HC 1122, Seventh report of session 2022-23, July 2023, Summary

Home Builders Federation (HBF), <u>Response to government's NPPF consultation</u>, March 2023

Freeths, <u>Planning Freethinking January 2023: NPPF Revisions Consultation</u>, January 2023

a year. Around 40% of the fall (30,400 homes) would be the result of LPAs no longer being required to review green belt boundaries to meet local housing need.⁷²

The Royal Town Planning Institute (RTPI) expressed concern the proposed changes would make the green belt "an unchangeable policy constraint on land use" which, it said, could affect the affordability of housing. The RTPI argued that the green belt should be reviewed regularly and at a strategic (city or regional) level to deliver homes and land for economic activity.⁷³

4.3 Calls for a national review of the green belt

In its <u>report on the future of the planning system in England</u> (June 2021), the Housing, Communities and Local Government (HCLG) Committee noted, however, that respondents were divided on whether the green belt should "never be built on" or constituted "an anti-growth mechanism". While some urged the government to protect, promote, and even extend the green belt, others expressed a wish to develop green belt land to build affordable housing and facilitate shorter commutes. ⁷⁴

The committee called for a review of the purpose of the green belt which, it said, should also examine "whether it continues to serve that purpose [...] and what additional protections might be appropriate". In its report on reforms to national planning policy (July 2023), its successor committee, the LUHC Committee, reiterated its call for a review of the purpose of the green belt. It said a review should also "assess the circumstances where brownfield sites within the Green Belt should be considered for development". The said a review of the green belt should be considered for development.

Differing views on a review of the green belt

Some, for example, the chief executive of the National Housing Federation (NHF), Kate Henderson, called for a review of the green belt on a "bigger strategic scale". The RTPI suggested establishing 'green growth boards' to support "broad growth strategies across whole city regions". The RTPI said

² Lichfields, Making a bad situation worse? The impact of the proposed NPPF changes on housing supply, February 2023

Royal Town Planning Institute (RTPI), NPPF consultation response, March 2023

HCLG Committee, The future of the planning system in England (PDF) HC 38, First report of the session 2021-22, June 2021, paras 205-208

HCLG Committee, <u>The future of the planning system in England</u> (PDF) HC 38, First report of the session 2021-22, June 2021, para 210

LUHC Committee, <u>Reforms to national planning policy</u> (PDF) HC 1122, Seventh report of session 2022-23, July 2023, paras 45-46

HCLG Committee, Oral evidence: The future of the planning system in England, HC 858, 9 November 2020, Q25

green growth boards could provide housing figures for their constituent LPAs and carry out strategic reviews of the green belt.⁷⁸

The property services group Leaders Romans said a review of the green belt was necessary because the green belt had, in part, driven the "north/south divide" and led to the inflation of house prices around cities like Cambridge, London, and Oxford. A review should form part of the "levelling up" agenda:

It is clear that the Government views Green Belt reform as separate from levelling up. This is ironic because Green Belt has, to some extent, driven the north-south divide, which itself brought about the need for levelling up agenda. The Green Belt constraints growth around cities such as Oxford, Cambridge and London, inflating house prices beyond the means of many, especially the young. Arguably, the presence of a green 'halo' around these and other locations (notable towns in the southeast ...), in which valuable urban brownfield sites have already been utilised, results in very limited opportunities for growth, and therefore a perception of exclusivity.⁷⁹

On the other hand, the Head of London Plan and Growth Strategies, Lisa Fairmaner, rejected a review of the green belt. She said there was no "reason to encroach on the green belt". She also pointed to the numerous benefits of the green belt for London, which included reducing "the urban-heat-island effect" and providing space for "recreation and food production.⁸⁰

Government response: No plans for a review

In its <u>response to the committee's 2021 report</u> (May 2022) <u>and to its 2023 report</u> (November 2023), the government said it had "no plans for a national review of the Green Belt". It stated that it was "committed to protecting and enhancing the green belt" and planning policy protections for the green belt "will remain firmly in place".⁸¹

HCLG Committee, Written evidence: the future of the planning system, HC 38 2021-22, FPS 113

Property Reporter, Fresh calls for a review as government announce latest Green Belt statistics, 20 September 2022 [accessed 7 February 2023]

HCLG Committee, Oral evidence: The future of the planning system in England, HC 858, 9 November 2020, Q156

DLUHC, Future of the planning system in England: Government response to the Select Committee report CP 673, May 2022, paras 59-60; Reforms to national planning policy report: Government response CP 989, November 2023

5 Selected further reading

- Centre for London, <u>Homes fit for Londoners</u>: <u>Solving London's housing</u> <u>crisis</u>, <u>December 2023</u>
- Policy Exchange, <u>The Property Owning Democracy</u>, December 2023
- CPRE, <u>State of the Green Belt 2023: A vision for the 21st century</u>, August 2023
- Green belts once served a vital purpose, but now they are squeezing the life out of cities, The Guardian, 21 May 2023
- Green Belt grows for the first time in nearly a decade, Housing Today, 16
 September 2022
- London: Is it time to build on the green belt to meet housing demand?,
 BBC News, 31 August 2021
- Government urged to identify the types of Green Belt land that could be built on, Property Reporter, 29 April 2021
- CPRE, Countryside next door: State of the Green Belt 2021, February 2021
- When is building on the green belt the most sustainable option?, PBC [planning, building information modelling and construction] Today, 14 September 2020
- The exceptional houses being built in idyllic countryside spots, thanks to the foresight of Paragraph 79, Country Life, 25 May 2020
- Centre for Cities, <u>More people are calling for Green Belt reform and the Government is listening</u>, March 2020
- Friends of the Earth, <u>Let's put the green into the green belt now there's</u> an idea, October 2019
- <u>Legal landscape: New green belt guidance short but sweet?</u>, The Planner, 19 August 2019
- Glenigan, <u>Reclassification and development of Greenbelt Land: prepared</u> for CPRE, July 2019
- Royal Institution of Chartered Surveyors, What if we readjusted the green belt?, 29 May 2019
- Landscape Institute, Landscape briefing: Green Belt policy, April 2018

- OECD, <u>Economic survey of the UK 2017</u> and OECD, <u>Economic surveys: UK October 2017</u>
- Local Government Association and Planning Advisory Service, <u>Planning</u>
 on the doorstep: the big issues Green Belt, February 2015

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