

Research Briefing

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By Felicia Rankl,  
Cassie Barton

# Green Belt



## Summary

- 1 Current Green Belt planning policy
- 2 How well is the Green Belt working?
- 3 Green Belt statistics
- 4 What's the future of the Green Belt? Recent discussions
- 5 Earlier proposals for change and previous planning policy
- 6 Selected further reading

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# Contents

<b>Summary</b>	<b>4</b>
<b>1 Current Green Belt planning policy</b>	<b>7</b>
1.1 Purpose of Green Belt	7
1.2 Development on Green Belt land	7
1.3 Altering Green Belt boundaries	9
<b>2 How well is the Green Belt working?</b>	<b>11</b>
2.1 Should the Green Belt be strengthened?	11
2.2 Is the Green Belt hampering growth?	12
<b>3 Green Belt statistics</b>	<b>15</b>
3.1 How big is the Green Belt?	15
3.2 Where is the Green Belt?	16
3.3 Development in the Green Belt	19
<b>4 What's the future of the Green Belt? Recent discussions</b>	<b>21</b>
4.1 Planning for the Future White Paper (2020)	22
4.2 Levelling Up White Paper (2022)	25
4.3 Levelling Up and Regeneration Bill (2022-23)	26
<b>5 Earlier proposals for change and previous planning policy</b>	<b>31</b>
5.1 DCLG consultation, December 2015	31
5.2 Housing White Paper, February 2017	31
5.3 Previous Green Belt planning policy	32
<b>6 Selected further reading</b>	<b>35</b>

# Summary

This briefing examines Green Belt planning policy and some of the recent discussions around the Green Belt. It applies only to England.

## Current Green Belt planning policy

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping some land permanently open around urban areas. It is for local authorities to define and maintain Green Belt land in their local areas. The Government expects local planning authorities (LPAs) with Green Belts to establish Green Belt boundaries in their Local Plans, which can be altered as part of the plan review process.

Government policy on protection for the Green Belt is set out in [chapter 13 of the National Planning Policy Framework \(NPPF\)](#) (PDF), which opens by stating that the Government attaches great importance to Green Belts. On protecting the Green Belt, the NPPF urges Local Planning Authorities (LPAs) to maximise the use of suitable brownfield sites before considering changes to Green Belt boundaries. The NPPF demands that there should be “exceptional circumstances” before Green Belt boundaries can be changed and says that inappropriate development is harmful to the Green Belt and should be approved only in “very special circumstances”.

[Planning Practice Guidance on the Green Belt](#) addresses questions about the factors that can be taken into account when considering development’s potential impact on the openness of the Green Belt. It also addresses how plans might set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements and how the local authorities can ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt will be secured.

## How well is the Green Belt working?

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 argue that the protections afforded by the Green Belt are too weak, and inappropriate development can encroach on the Green Belt, while others argue that the protections are too strong, and get in the way of building sufficient housing and so limit economic growth.

A [2010 report](#) by Natural England and CPRE (formerly the Campaign to Protect Rural England) concluded that Green Belt policy continued to be “highly effective” but called for “more ambition” to protect Green Belt land. In addition to preventing urban sprawl, CPRE pointed to [other benefits of the Green Belt](#), including providing opportunities for fresh air and exercise for

people living in nearby cities. CPRE has [taken the stance](#) that building on the Green Belt could “not solve the crisis in affordable housing”.

Think tanks such as the [Adam Smith Institute](#) and the [Institute of Economic Affairs](#) have argued that the release of (at least some) Green Belt land could help “solve the housing crisis”. The [Organisation for Economic Co-operation and Development](#) (OECD) has also criticised the Green Belt system for being an obstacle to house building.

The [Centre for Cities](#) has suggested releasing Green Belt land within a short distance of train stations that serve major cities for development. The property agents [Savills](#) have suggested that losses in Green Belt land in one area could be offset by the designation of land as Green Belt elsewhere.

## How large is the Green Belt?

England had around 16,382 km<sup>2</sup> (or 6,324 square miles) of Green Belt land at the end of March 2022, covering 12.6% of England’s land area.

The Green Belt is clustered around 15 urban cores, the largest of which are London (5,062 km<sup>2</sup>), Merseyside and Greater Manchester (2,489 km<sup>2</sup>), and South and West Yorkshire (including Sheffield, Leeds and Bradford, 2,270 km<sup>2</sup>).

## How much building has there been in the Green Belt?

An estimated 93.2% of the Green Belt was undeveloped land in 2018, and this land was primarily used for agriculture (65.6% of all Green Belt land). 6.7% 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.

In 2017/18, 8.9 km<sup>2</sup> of previously undeveloped Green Belt land changed to a developed use, of which 2.9 km<sup>2</sup> turned into residential use.

## What’s the future of the Green Belt?

Recent proposals to change the planning system have once again brought the Green Belt to the fore, with some commentators arguing that the need for housing will only be met if development takes place on the Green Belt.

An [inquiry by the Housing, Communities and Local Government Committee](#) called for a review to “examine the purpose of the Green Belt”. The Committee noted that stakeholders were divided on whether Green Belt land should “never be built on” or constituted “an anti-growth mechanism”.

The [Levelling Up and Regeneration Bill](#), which followed the [Planning for the Future White Paper](#) (and the [Levelling Up White Paper](#)) would introduce significant changes to the planning system. The Government said it would

make [further changes to national planning policy](#), including the NPPF, alongside the Bill.

The Government has proposed amending the NPPF to make clear that local planning authorities “are [not required to review and alter Green Belt boundaries](#) if this would be the only way of meeting [housing] need in full”. It has also suggested that National Development Management Policies, which the Bill would introduce, might include protections for Green Belt land.

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# 1 Current Green Belt planning policy

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To find out which land in an area is designated as Green Belt, contact the relevant LPA.

It is for Local Planning Authorities (LPAs) to define and maintain Green Belt land in their local areas. Local Plans set out the plan for the future development of a local area, drawn up by the LPA in consultation with the community. The Government expects LPAs with Green Belts to establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Green Belt boundaries can be altered as part of the Local Plan review process.

## 1.1 Purpose of Green Belt

According to the [National Planning Policy Framework \(NPPF\)](#) (PDF), “the fundamental aim” of the Green Belt “is to prevent urban sprawl by keeping land permanently open”.<sup>1</sup> Specifically, 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, and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.<sup>2</sup>

## 1.2 Development on Green Belt land

### National Planning Policy Framework (NPPF)

The NPPF was first published in 2012. Following a consultation, the updated NPPF 2019 was published in July 2018, with some further, minor amendment in February 2019. Following another consultation, the NPPF was revised again in July 2021. The chapter on the Green Belt has remained unchanged since 2019.

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<sup>1</sup> Ministry of Housing, Communities and Local Government (MHCLG, now the Department for Levelling Up, Housing and Communities, DLUHC), [National Planning Policy Framework](#) (PDF), July 2021, paragraph 137

<sup>2</sup> MHCLG, [National Planning Policy Framework](#) (PDF), July 2021, paragraph 138

The NPPF sets out the Government's planning policy. It provides a framework against which LPAs draw up Local Plans and determine planning applications.

The NPPF 2019 – including its provisions on the Green Belt – is discussed in the Commons Library briefing [What next for planning in England? The National Planning Policy Framework](#).<sup>3</sup>

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 examples of exceptions, such as limited affordable housing for local community needs under policies set out in the Local Plan.<sup>4</sup>

The NPPF provides that development on the Green Belt should only be approved in “in very special circumstances”.<sup>5</sup> These “very special circumstances” exist only when the potential harm to the Green Belt is “clearly outweighed by other considerations”.<sup>6</sup>

A [PQ reply in March 2022](#) sets out why “very special circumstances” are not further defined in the NPPF and how LPAs should interpret them:

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.<sup>7</sup>

In its [response to the consultation on the NPPF 2019](#) (PDF), the Government said it had no plans to review national Green Belt policy or to completely ban development within the Green Belt. However, it stated that the NPPF made clear that “other options should be considered fully before it is concluded that Green Belt releases are appropriate”.<sup>8</sup>

A [PQ reply in September 2022](#) confirmed that protections afforded to the Green Belt remain in place and that planning permission should not be granted to developments except in “very special circumstances”.

This Government has a manifesto commitment to protect and enhance the Green Belt. ... Within Green Belt, most types of new building are questioned and should be refused planning permission unless there are very special circumstances, as determined by the local authority. These strong protections for Green Belt land are to remain firmly in place.<sup>9</sup>

<sup>3</sup> Commons Library briefing, [What's next for planning in England? The National Planning Policy Framework](#) CBP 8260, 10 June 2019

<sup>4</sup> MHCLG, [National Planning Policy Framework](#) (PDF), July 2021, paragraph 149f

<sup>5</sup> As above, paragraph 137

<sup>6</sup> As above, paragraph 147-149

<sup>7</sup> [PQ 140431, 15 March 2022](#)

<sup>8</sup> MHCLG, [Government response to the draft revised National Planning Policy Framework consultation](#) (PDF), July 2018, Government response to Question 30

<sup>9</sup> [PQ 53431, 21 September 2022](#)



## Planning Practice Guidance 2019

The Ministry for Housing, Communities and Local Government (MHCLG, now the Department for Levelling Up, Housing and Communities, DLUHC) published Planning Practice Guidance (PPG) [on the Green Belt](#) in July 2019. It addresses which factors can be taken into account when considering the potential impact of development on Green Belt. These include (but are not limited to) the visual impact of a development, whether the land could be returned to its original state, and the degree of activity a development will generate.<sup>10</sup>

The PPG [on the Green Belt](#) also addresses how LPAs can ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt will be secured and how Local Plans might set out policies to offset the impact of removing land from the Green Belt.<sup>11</sup>

### 1.3

## Altering Green Belt boundaries

The NPPF states that “the general extent of Green Belts across the country is already established”.<sup>12</sup> Although Green Belt land should have a degree of permanence, LPAs may conduct a review of Green Belt land and consider redefining boundaries to expand or remove land from the Green Belt to meet local planning needs.<sup>13</sup>

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.<sup>14</sup> The NPPF goes on to say that, prior to changing Green Belt boundaries, the LPA should “demonstrate that it has examined all other reasonable options for meeting its identified need for development”.<sup>15</sup> Specifically, it should examine whether its strategic policies:

- make as much use as possible of brownfield sites and underutilised land;
- optimise the density of development and make effective use of land; and
- have been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.<sup>16</sup>

Where an LPA concludes that releasing Green Belt land for development is necessary, the NPPF provides that land which has been previously developed

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<sup>10</sup> DLUHC and MHCLG, [Planning Practice Guidance: Green Belt](#), 22 July 2019, paragraph 001

<sup>11</sup> As above, paragraph 002/003

<sup>12</sup> MHCLG, [National Planning Policy Framework](#) (PDF), July 2021, paragraph 139

<sup>13</sup> As above, paragraph 140

<sup>14</sup> As above, paragraph 140

<sup>15</sup> As above, paragraph 141

<sup>16</sup> As above, paragraph 141

and/or is well-served by public transport should be released first.<sup>17</sup> It also requires LPAs to set out ways in their Local Plans in which the impact of removing land from the Green Belt can be offset, for example by improving the accessibility of remaining Green Belt land.<sup>18</sup>

The Government reaffirmed its stance on altering Green Belt boundaries in a [PQ reply in October 2021](#). It said that “most types of new development” were considered “inappropriate for the Green Belt” and should be refused planning permission unless justified by “very special circumstances”.<sup>19</sup>

The Government has also made clear in a [PQ reply in September 2022](#) that LPAs must have explored “every other reasonable option” prior to altering Green Belt boundaries in their Local Plan:

Our National Planning Policy Framework makes clear that a local authority should not propose to alter a Green Belt boundary unless there are exceptional circumstances and it can show at examination of the Local Plan that it has explored every other reasonable option: including using brownfield land or optimising the density of development.<sup>20</sup>

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<sup>17</sup> MHCLG, [National Planning Policy Framework](#) (PDF), July 2021, paragraph 142

<sup>18</sup> As above, paragraph 142

<sup>19</sup> [PQ 57018, 15 October 2021](#)

<sup>20</sup> [PQ 53431, 21 September 2022](#)

## 2

# How well is the Green Belt working?

### In a nutshell

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 argue that the protections afforded by the Green Belt are too weak, and inappropriate development can encroach on the Green Belt, while others argue that the protections are too strong, and can get in the way of building sufficient housing and so limit growth.

## 2.1

### Should the Green Belt be strengthened?

A [2010 report on the Green Belt](#) by Natural England and CPRE (formerly the Campaign to Protect Rural England) examined the history of the Green Belt, its legislative and policy protections and their success at protecting the Green Belt, and the state of the Green Belt.

The report concluded that Green Belt policy continued to be “highly effective in terms of its principle purposes”. In addition to preventing urban sprawl, it pointed to other benefits of the Green Belt, such as ecosystem services and public access opportunities. The report called for “more ambition” to enhance Green Belt land.<sup>21</sup>

In a [report on the state of the Green Belt](#) published in August 2018, CPRE concluded that building on the Green Belt could “not solve the crisis in affordable housing”. Amongst the report’s key findings were 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”.<sup>22</sup>

The CPRE published an updated [report on the state of the Green Belt](#) (PDF) in February 2021. This 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

<sup>21</sup> Natural England and CPRE, [Green Belts: A Greener Future](#), 27 January 2010, page 90

<sup>22</sup> CPRE, [The State of the Green Belt](#) (PDF), August 2018, Executive Summary, page 2

faced by Green Belt land” was “unprecedented”. It called on the Government to make sure that “previously developed land” is “prioritised”.<sup>23</sup>

CPRE also argued in a [2021 article](#) that “instead of viewing the Green Belts as a limitation to building more homes, we need to focus on restoring and enhancing the Green Belt”.<sup>24</sup> The article pointed to the numerous benefits of the Green Belt.

In addition to preventing urban sprawl, CPRE highlighted that the Green Belt provided land for “agricultural use” which helped meet “local needs for food” and provided opportunities for “fresh air and exercise” which improved “health and wellbeing”.<sup>25</sup>

The London Green Belt Council, in its 2022 report [Safe under us? The continued shrinking of London’s local countryside](#) (PDF), concluded that especially during the Covid-19 pandemic, Green Belts provided “crucially important ... open spaces close to urban borders for public recreation”. In addition to providing opportunities for exercise, it highlighted that Green Belts played a role in “mitigating the effects of climate change” in “big crowded cities”.<sup>26</sup>

In a [policy paper published in February 2020](#) (PDF), CPRE also highlighted that the Green Belt played an important role in addressing climate and ecological emergencies.<sup>27</sup> A [2021 article](#) reiterated this argument:

[T]hese girdles of green around our built-up areas are rich in nature, too. Over a third of the country’s community forests (forests connected to and nearby urban communities) are in the Green Belt, as well as tens of Local Nature Reserves.

These corridors of nature and green space work brilliantly for wildlife, allowing creatures to move between habitats safely and flourish in a mix of landscapes.<sup>28</sup>

## 2.2

## Is the Green Belt hampering growth?

Whether this level of protection for the Green Belt remains necessary or appropriate – or whether, conversely, it places unwarranted obstacles in the way of providing new housing – remains controversial.

The Adam Smith Institute called for a “complete abolition of the Green Belt” in a [2015 report titled “The Green Noose”](#), arguing that this “could solve the

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<sup>23</sup> CPRE, [The State of the Green Belt](#) (PDF), February 2021, Executive Summary, page 2

<sup>24</sup> Philippa Oppenheimer, [What is the Green Belt, and why does it matter?](#), CPRE, 29 July 2021

<sup>25</sup> As above

<sup>26</sup> London Green Belt Council, [“Safe Under Us?” The continued shrinking of London’s local countryside](#) (PDF), August 2022, Foreword, page 3

<sup>27</sup> CPRE, [A 21<sup>st</sup> Century Green Belt and Countryside Next Door](#) (PDF), February 2020, page 2

<sup>28</sup> Philippa Oppenheimer, [What is the Green Belt, and why does it matter?](#), CPRE, 29 July 2021

housing crisis”. As an alternative in the short term, it proposed “removing restrictions” on Green Belt land within a ten-minute walk of railway stations to allow for the development of one million additional homes.<sup>29</sup>

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”. Its [2019 report](#) (PDF) put forward the argument 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”.<sup>30</sup>

In a [2014 article on London’s Green Belt](#), the London Society said that “our towns and cities will each need, at some level to integrate with their green belts”.<sup>31</sup> 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.<sup>32</sup>

The Royal Town Planning Institute (RTPI) also said that “green belt boundaries may well need to change”, albeit subject to safeguards, in a 2016 policy paper dealing with the question of [where new homes should be built](#).<sup>33</sup>

A “strategic review of Green Belt across England” and a “loosening of NPPF restriction on development of Green Belt” was also suggested by the property agents Savills. In a [2020 article](#), Savills proposed offsetting the loss of Green Belt in one location by the designation of Green Belt elsewhere, outlining the potential benefits of this approach:

Designating land on the edge of the Green Belt in exchange for developing land near transport hubs within the Green Belt would not just help deliver socially and environmentally sustainable development but would also help fulfil the goals of the Green Belt in protecting areas of countryside.

... [D]evelopment provides an opportunity to improve the quality of remaining Green Belt land. Particular focus can be placed on improving environmental value, and improving public access to open space.<sup>34</sup>

A [2019 collection of essays](#) published by the think tank 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:

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<sup>29</sup> Tom Papworth, [The Green Noose: An analysis of Green Belts and proposals for reform](#), Adam Smith Institute, 14 January 2015

<sup>30</sup> Paul Cheshire and Boyana Buyuklieva, [Homes on the right track: Greening the Green Belt to solve the UK housing crisis](#), Centre for Cities, 22 September 2019

<sup>31</sup> London Society, [London’s Green Belt](#), 19 October 2014

<sup>32</sup> As above

<sup>33</sup> RTPI, [Where should we build new homes?](#), 11 March 2016

<sup>34</sup> Hamish Simmie, [Is Green Belt being used as effectively as it could be?](#), Savills, 3 June 2022

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.<sup>35</sup>

The Organisation for Economic Co-operation and Development (OECD), too, has criticised policies that restrict housing development, including the Green Belt. The [OECD's 2011 economic survey](#) (PDF) advocated a review of Green Belt designation:

[T]here is scope to make more land available for building houses. In particular, Green Belts constitute a major obstacle to development around cities, where housing is often needed. Replacing Green Belts by land-use restrictions that better reflect environmental designations would free up land for housing, while preserving the environment.<sup>36</sup>

See section 6 of this briefing paper: selected further reading, for other articles touching on some of these issues.

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<sup>35</sup> Jacob Rees-Mogg and Radomir Tylecote, [Raising the roof](#), Institute of Economic Affairs, 22 July 2019

<sup>36</sup> OECD, [Economic Surveys: United Kingdom](#) (PDF), March 2011, paragraph 19

## 3 Green Belt statistics

### In brief

England has around 16,382 km<sup>2</sup> (or 6,324 square miles) of Green Belt land, clustered around 15 urban cores.

The Green Belt grew by 242 km<sup>2</sup> between March 2021 and March 2022 because of local 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 km<sup>2</sup> per year because of this type of change in designation.

66% of Green Belt land is used for agriculture. 7% is developed.

An estimated 8.9 km<sup>2</sup> of previously-undeveloped Green Belt land changed to developed use in 2017/18, of which 2.9 km<sup>2</sup> was changed to residential buildings.

### 3.1 How big is the Green Belt?

The Green Belt in England was estimated to be 16,382 km<sup>2</sup> or 6,324 square miles at the end of March 2022. This is approximately three times the size of Norfolk, and equivalent to 12.6% of the land area of England.<sup>37</sup>

The extent of the Green Belt has changed over time. In 1979 the UK-wide Green Belt was 7,215 km<sup>2</sup>.<sup>38</sup> By 1997, the Green Belt in England had grown to cover 16,523 km<sup>2</sup>.<sup>39</sup> In 2005, 473 km<sup>2</sup> 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 2022, it was around 0.4% larger than it was in 2006.<sup>40</sup>

Changes in the estimated size of the Green Belt are mostly due to local authorities 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. Between March 2013 and March 2021, the Green Belt had a net reduction

<sup>37</sup> DLUHC, [Local authority green belt: England 2021-22 – statistical release](#), 16 September 2022

<sup>38</sup> HC Deb 28 July 1997 c47W

<sup>39</sup> DLUHC, [Local authority green belt: England 2021-22 – statistical release](#), Accompanying tables, 16 September 2022

<sup>40</sup> As above

in size of around 178 km<sup>2</sup> due to these changes, an average of 24 km<sup>2</sup> per year.<sup>41</sup>

However, between March 2021 and March 2022 the Green Belt grew by around 242 km<sup>2</sup> because of changes in local authority designation policies. 90% of this increase was due to the adoption of a new Local Plan in Northumberland. Northumberland's new Local Plan defines Green Belt boundaries around Morpeth where previously a "general extent" had been identified, but detailed boundaries had not been established or included in data returns.<sup>42</sup>

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 km<sup>2</sup>) is designated as either Green Belt land or one of these other designations.<sup>43</sup>

## 3.2

### 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, 2022	
Urban core	Area (km <sup>2</sup> )
London	5,062
Merseyside & Greater Manchester	2,489
South and West Yorkshire	2,472
Birmingham	2,270
Tyne & Wear	986
Bath and Bristol	717
Derby & Nottingham	600
Stoke-on-Trent	444
South West Hampshire	347
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: 2021-22](#), Table 4

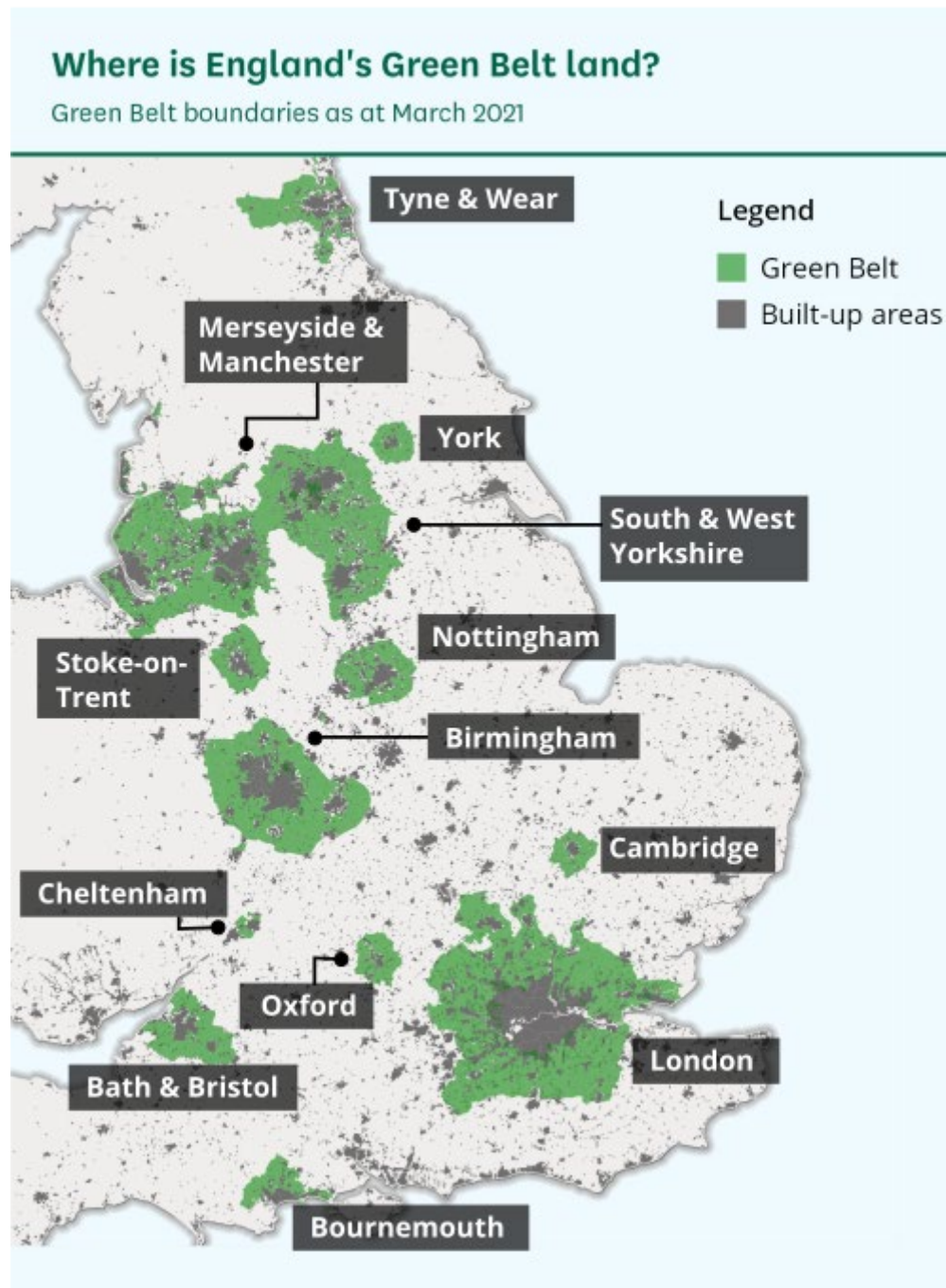
<sup>41</sup> DLUHC, [Local authority green belt: England 2021-22 – statistical release](#), Table 3, 16 September 2022

<sup>42</sup> As above. See Annex A of the release for a more detailed explanation of the impact of the Northumberland Local Plan.

<sup>43</sup> As above, Accompanying tables



The map below shows the location of Green Belt land, using boundaries accurate at the end of March 2021, published by DLUHC. These boundaries were the most recent available at the time of publication.



Source: DLUHC, English local authority Green Belt dataset, 2020/21 boundaries [Accessed 4 October 2022]

Contains OS data © Crown Copyright 2022

A number of detailed, interactive maps of Green Belt boundaries have been produced using DLUHC data, such as the Government's [National map of planning data](#).

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 2022

	Green Belt (km <sup>2</sup> )	% of total area
<b>1</b> Tandridge	233.1	94%
<b>2</b> Epping Forest	316.8	93%
<b>3</b> Sevenoaks	344.0	93%
<b>4</b> West Lancashire	310.3	90%
<b>5</b> Bromsgrove	193.1	89%
<b>6</b> Brentwood	133.0	87%
<b>7</b> Guildford	226.4	84%
<b>8</b> York	224.1	82%
<b>9</b> Windsor and Maidenhead	162.7	82%
<b>10</b> St Albans	131.5	82%

Source: DLUHC, [Local authority green belt statistics for England: 2021-22](#), 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. Full data can be downloaded from [the landing page for this briefing paper](#).

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 2022

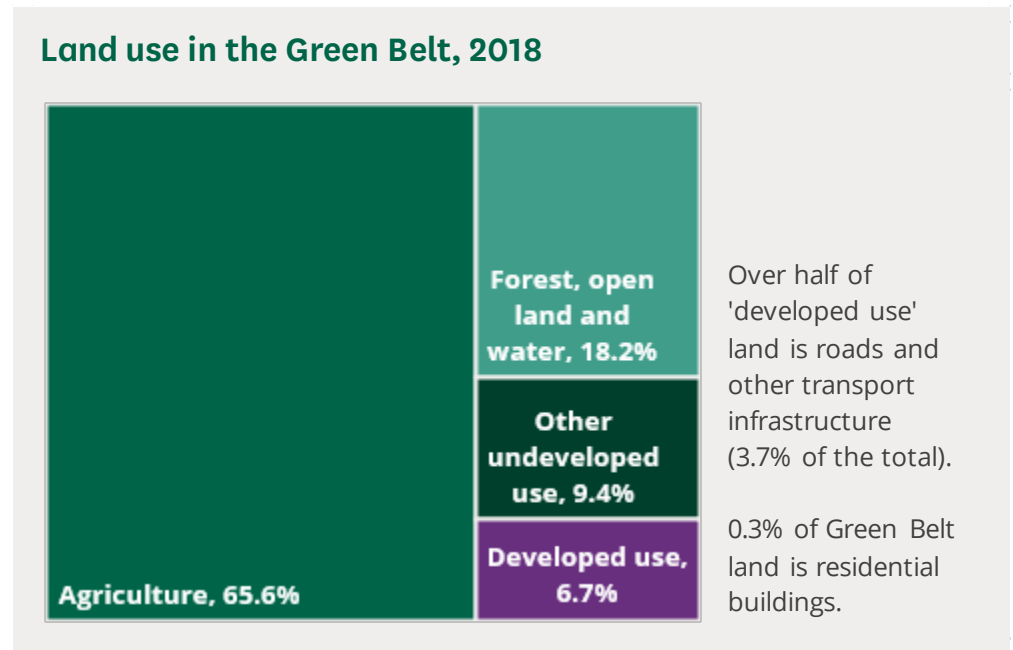
	Green Belt (km <sup>2</sup> )	% of total area
<b>1</b> Brentwood and Ongar	293.8	93%
<b>2</b> South Staffordshire	250.1	91%
<b>3</b> Sevenoaks	227.0	91%
<b>4</b> East Surrey	234.7	91%
<b>5</b> Tonbridge and Malling	270.5	90%
<b>6</b> Bromsgrove	193.1	89%
<b>7</b> Chesham and Amersham	173.9	89%
<b>8</b> York Outer	219.8	89%
<b>9</b> West Lancashire	231.3	88%
<b>10</b> South Ribble	169.7	86%

Source: DLUHC, [Local authority green belt statistics for England: 2021-22](#), Accompanying tables

## 3.3

## Development in the Green Belt

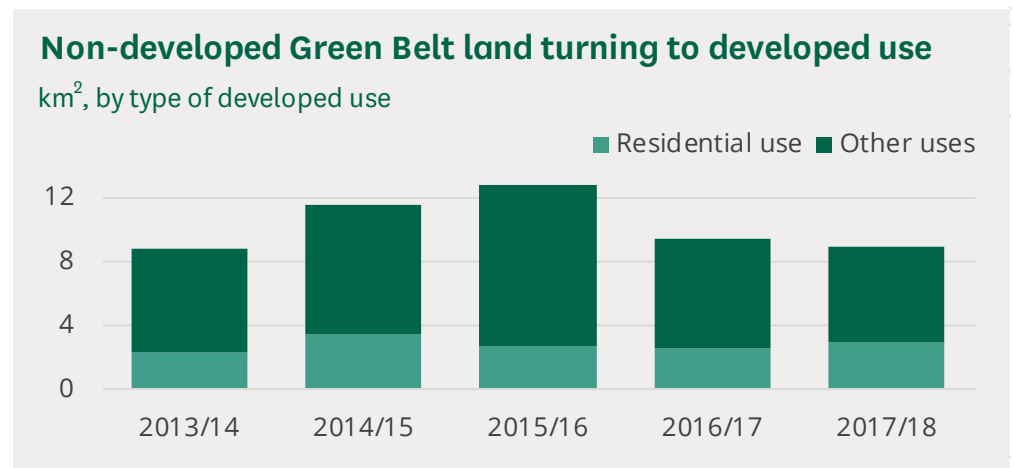
DLUHC has published estimates of how land is used in the Green Belt. In 2018, 6.7% of Green Belt land was developed and 93.2% was non-developed uses. The most common non-developed use was agriculture, with agricultural land and buildings accounting for 65.6% of Green Belt land. Forest, open land and water accounted for 18.2%. 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.<sup>44</sup>



Source: DLUHC, [Live tables on land use](#), Land use in England 2018

DLUHC has also published statistics on land use change in the Green Belt up to 2017/18. In total, 8.9 km<sup>2</sup> of previously undeveloped Green Belt land changed to a developed use category in 2017/18. A further 19.2 km<sup>2</sup> of previously-developed Green Belt land turned into another developed use category (e.g. industrial sites becoming residential).

<sup>44</sup> DLUHC, [Live tables on land use](#), Land use in England 2018, Table P401a, 16 July 2020



Source: DLUHC, [Live tables on land use change](#), 2017/18 land use change based tables

4.1 km<sup>2</sup> of Green Belt land changed to residential use in 2017/18. The majority (69%, or 2.9 km<sup>2</sup>) of this land was not previously developed. The chart above shows the trend in undeveloped Green Belt land changing to developed use in recent years.<sup>45</sup>

<sup>45</sup> MHCLG, [Live tables on land use change](#), 2017/18 land use change based tables P380, P382, P383

## 4

## What's the future of the Green Belt? Recent discussions

### Housing need and supply

The Conservative party's 2019 election manifesto included a commitment to build 300,000 homes per year by the mid-2020s.<sup>46</sup> In December 2022, the Government reaffirmed its commitment to building 300,000 homes a year.<sup>47</sup>

It is difficult to put a precise number on the amount of new housing needed in England. New household formation creates need for housing, but some commentators have also focused on a backlog of existing need amongst people who are living in unsuitable housing.

Research commissioned by the National Housing Federation (NHF) and Crisis identified a need for 340,000 new homes each year over a 15-year period, including a need for 145,000 affordable homes.<sup>48</sup>

New supply of housing has not yet reached 300,000 per year. 216,000 new homes were supplied in 2020/21 – lower than the 243,000 new homes supplied in 2019/20, in part because of disruption caused by the Covid-19 pandemic. However, delivery in 2019/20 was 95% higher than a low point of 125,000 in 2012/13.<sup>49</sup>

The Library briefing [Tackling the under-supply of housing \(England\)](#) has a more detailed summary of housing need and supply in its first two chapters.<sup>50</sup>

Recent proposals to change the planning system have once again brought the Green Belt to the fore. Put simply, some commentators have argued that the need for more housing will only be met if some development takes place on the Green Belt. This was following the publication of the Government's [Planning for the Future White Paper](#) (PDF) in August 2020.

The [Levelling Up and Regeneration Bill 2022-23](#) would introduce significant changes to the planning system. Alongside the Bill, the Government said it

<sup>46</sup> [The Conservative and Unionist Party Manifesto 2019](#)

<sup>47</sup> HC Deb 13 December 2022, [c954-955](#)

<sup>48</sup> Bramley, G. for Crisis, [Housing supply requirements across Great Britain: for low-income households and homeless people](#) (PDF), December 2018, page 10

<sup>49</sup> MHCLG, [Live tables on housing supply: net additional dwellings](#), Table 120

<sup>50</sup> Commons Library briefing, [Tackling the under-supply of housing in England](#) CBP 7671, February 2022

would make further changes to national planning policy. One of the changes proposed is amending the NPPF to make clear that LPAs are not required to review and alter Green Belt boundaries to meet local housing need in full.<sup>51</sup>

The Commons Library briefing [Planning for the Future: planning policy changes in 2020 and future reforms](#) provides further information on the proposals in the Planning for the Future White Paper and some of the response to them. It also examines the Levelling Up White Paper.

A Commons Library briefing provides further information on the [clauses in the Bill](#). A Lords Library briefing provides information on the [clauses that were added to the Bill](#) during its passage through the Commons.

## 4.1 Planning for the Future White Paper (2020)

The [Planning for the Future White Paper](#) (PDF) was published in August 2020, with an [accompanying press release](#).<sup>52</sup> A [consultation](#) on the changes proposed in the White Paper opened on 6 August and closed on 29 October 2020.<sup>53</sup>

The White Paper proposed streamlining the planning process by placing land in three categories: growth areas “suitable for substantial development”, renewable areas “suitable for some development” and protected areas. It also suggested introducing “general development management policies” for national policies and giving Local Plans “a more focused role”.<sup>54</sup>

The Government said the proposed reforms would “transform” the planning system to make it simpler and improve its transparency.<sup>55</sup>

The Conservative party’s 2019 election manifesto included a commitment to deliver 300,000 homes per year by the mid-2020s.<sup>56</sup> In an evidence session with the Housing, Communities and Local Government (HCLG) Select Committee in 2018, the Government had argued that supplying 300,000 homes per year would reduce affordability pressures.<sup>57</sup> The White Paper reiterated the target of “delivering 300,000 homes annually, and one million homes” by the end of the current parliamentary term.<sup>58</sup>

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<sup>51</sup> DLUHC, [Levelling-up and Regeneration Bill: reforms to national planning policy](#), December 2022

<sup>52</sup> MHCLG, [White paper: Planning for the Future](#) (PDF), August 2020; MHCLG, [Launch of Planning for the future consultation to reform the planning system](#), Press release, 6 August 2020

<sup>53</sup> DLUHC and MHCLG, [Closed consultation: Planning for the future](#), last updated February 2021

<sup>54</sup> MHCLG, [White paper: Planning for the Future](#) (PDF), August 2020, paragraph 1.16

<sup>55</sup> MHCLG, [Launch of Planning for the future consultation to reform the planning system](#), Press release, 6 August 2020

<sup>56</sup> [The Conservative and Unionist Party Manifesto 2019](#)

<sup>57</sup> HCLG Committee, [Oral Evidence: Housing Prices](#) (PDF), HC 830, 12 March 2018, Q3

<sup>58</sup> MHCLG, [White paper: Planning for the Future](#) (PDF), August 2020, paragraph 1.20

Within the three planning categories outlined in the White Paper, the Green Belt would have been placed in the “protected” category.<sup>59</sup>

The White Paper also state that the “new nationally-determined, binding housing requirement” which LPAs would have to deliver through their Local Plans, “would factor in land constraints, including the Green Belt”.<sup>60</sup> In discussing the method for calculating housing need and allocating land to meet that requirement, the White Paper again stated that “the existing policy for protecting the Green Belt would remain”.<sup>61</sup>

The [press release accompanying the White Paper](#) confirmed that the “Green Belt will continue to be protected for future generations”, with reforms concentrating on more building on brownfield land. It also confirmed that “decisions on the Green Belt will stay with local authorities”.<sup>62</sup>

## Select Committee inquiry into the White Paper

The Housing, Communities and Local Government (HCLG) Select Committee held an inquiry into the [future of the planning system in England](#) which examined the proposals set out in the Planning for the Future White Paper.

In its [subsequent report](#), the Select Committee called for a review to “examine the purpose of the Green Belt, including whether it continues to serve that purpose ... and what additional protections might be appropriate”. The report said the creation of new Local Plans provided an opportunity to review the Green Belt locally and said the Government should identify in which areas such reviews were particularly urgent.<sup>63</sup>

The Select Committee also called on the Government to “publish the evidential base for its 300,000 housing units a year target” and called for “greater clarity on how the Government will deliver its ambition”.<sup>64</sup>

In an [evidence session with the HCLG Select Committee](#), the then Housing Minister, Christopher Pincher, highlighted the Government’s “manifesto commitment to maintain the green belt” and reiterated that “existing green belt policy will remain”. He pointed to brownfield regeneration as a way to “achieve our building ambitions without encroaching on important green spaces that we know communities ... feel very strongly about”.<sup>65</sup>

In its [response to the inquiry](#), published in May 2022, the Government again reiterated that it had “no plans for a national review of the Green Belt” and

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<sup>59</sup> MHCLG, [White paper: Planning for the Future](#) (PDF), August 2020, paragraph 2.8

<sup>60</sup> As above, paragraph 1.20

<sup>61</sup> As above, paragraph 2.26

<sup>62</sup> MHCLG, [Launch of Planning for the future consultation to reform the planning system](#), Press release, 6 August 2020

<sup>63</sup> Housing, Communities, and Local Government (HCLG) Committee, [The future of the planning system in England](#), HC 38 2021-22, June 2021, paragraph 210

<sup>64</sup> As above, paragraph 116

<sup>65</sup> HCLG Committee, [Oral evidence: The future of the planning system in England](#), HC 858, 7 December 2020, Q156



remained “committed to protecting and enhancing the Green Belt”. It also pointed to its commitment in the Levelling Up White Paper to make “further improvements” to the Green Belt.<sup>66</sup>

The Government also reiterated its ambition to building 300,000 homes per year on average in its response. It said that there seemed to be “consensus” that achieving this target would “deliver price and demand stability”.<sup>67</sup>

## Reaction to Planning for the Future’s proposals

The HCLG Select Committee reported that responses to its call for evidence criticised the “perceived neglect of the Green Belt” in the White Paper.<sup>68</sup> It noted, however, that respondents were divided on whether Green Belt land should “never be built on”<sup>69</sup> or constituted “an anti-growth mechanism”.<sup>70</sup>

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.<sup>71</sup>

CPRE called for “stronger planning policies to support enhancement of the Green Belt”.<sup>72</sup> It expressed concern that a zonal planning system could pose risks to the permanence of Green Belt boundaries:

[S]ince the Local Plan is to be renewed every five years to allow for updates to the housing requirement, this may result in quite frequent changes to the boundary between a Growth zone and a Protected zone (possibly more quickly than the time it takes to resolve previous conflicts), so there is a risk that Green Belt boundaries will lose the permanence that is essential to their function.<sup>73</sup>

In an [evidence session with the HCLG Select Committee](#), Lisa Fairmaner, the Head of London Plan and Growth Strategies, 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”.<sup>74</sup>

However, Brian Berry, the Chief Executive of Masters Builders, said the Green Belt was “not all lush, green land”. Rather, “it is some scrubland which could actually be quite helpful in terms of development”.<sup>75</sup> Kate Henderson, Chief

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<sup>66</sup> DLUHC, [Government response to the Levelling Up, Housing and Communities Select Committee report on The Future of the Planning System in England](#), CP 673, May 2022, paragraph 59/60

<sup>67</sup> As above, paragraph 35

<sup>68</sup> Housing, Communities, and Local Government (HCLG) Committee, [The future of the planning system in England](#), HC 38 2021-22, June 2021, paragraph 204

<sup>69</sup> As above, paragraph 205

<sup>70</sup> As above, paragraph 207

<sup>71</sup> As above, paragraph 208

<sup>72</sup> HCLG Committee, [Written evidence: the future of the planning system](#), HC 38 2021-22, FPS 165

<sup>73</sup> CPRE, [Consultation response to Planning for the Future White Paper](#) (PDF), 27 October 2020, page 13

<sup>74</sup> HCLG Committee, [Oral evidence: The future of the planning system in England](#), HC 858, 9 November 2020, Q156

<sup>75</sup> As above, Q27



Executive of the National Housing Federation, called for a review of the Green Belt on a “bigger strategic scale”. She said just releasing land in “exceptional circumstances” meant reviewing Green Belt land was “very difficult”.<sup>76</sup>

The Royal Town and Planning Institute (RTPI) argued that “at least as much effort and resources should go into the creation of new communities as in defending the green belt”. Instead of “blanket green belts”, the RTPI suggested establishing Green Growth Boards to support “broad growth strategies across whole city regions”.<sup>77</sup> These could provide housing figures for their constituent LPAs and carry out strategic reviews of the Green Belt.<sup>78</sup>

The Centre for Cities also argued that “the green belt must be reformed” to ease housing pressures and allow for growth:

The green belt must be reformed. It is essentially untouched from its designation in the 1990s, despite major changes in the national and local economies since then and the emergence of a crippling housing shortage. Ending the housing crisis requires more homes in and around the most expensive cities and large towns. Like any other belt, it must be loosened when growth occurs, or it becomes painful and restrictive.<sup>79</sup>

Referring to previous [proposals](#), the Centre for Cities suggested releasing Green Belt land within 800 metres of stations that are within 45 minutes of London, Greater Manchester, Bristol, Birmingham, and Newcastle. It said this could deliver “between 1.6 million to 2.1 million homes”.<sup>80</sup>

## 4.2

## Levelling Up White Paper (2022)

The [Levelling Up White Paper](#) was published in February 2022.<sup>81</sup> It set out the Government’s proposals for its “levelling up” policy, which is intended to reduce geographic economic, social and health inequalities.

Among other things, the White Paper said the Government would reform the planning system “ensure that planning becomes a tool for levelling up across England”.<sup>82</sup> It said the Government’s “levelling up” proposals would “reduce pressure on housing and on greenfield and Green Belt sites in overheated areas of London and the South East”.<sup>83</sup>

The White Paper set out an intention to make “improvements to the planning system” to deliver “more housing in England, including more genuinely

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<sup>76</sup> HCLG Committee, [Oral evidence: The future of the planning system in England](#), HC 858, 9 November 2020, Q25

<sup>77</sup> HCLG Committee, [Written evidence: the future of the planning system](#), HC 38 2021-22, FPS 113

<sup>78</sup> As above

<sup>79</sup> HCLG Committee, [Written evidence: the future of the planning system](#), HC 38 2021-22, FPS 144

<sup>80</sup> As above

<sup>81</sup> DLUHC, [Policy Paper: Levelling Up the United Kingdom](#), February 2022

<sup>82</sup> DLUHC, [Policy Paper: Levelling Up](#) (PDF), February 2022, page 227

<sup>83</sup> DLUHC, [Policy Paper: Levelling Up](#) (PDF), February 2022, page 225

affordable social housing”.<sup>84</sup> It reiterated the Government’s target to build 300,000 new homes per year by the mid-2020s. The White Paper argued investment in brownfield and infrastructure projects as well as the Affordable Homes Programme would help deliver that goal.<sup>85</sup>

Under the heading of “restoring a sense of community, local pride and belonging”, the White Paper set out proposals aimed at “enhancing and maintaining” the Green Belt. These included furthering the “greening” of the Green Belt, improving public access to the Green Belt while delivering nature recovery, and securing further environmental improvements.<sup>86</sup>

In its [response to the Select Committee’s inquiry](#) into the 2020 Planning for the Future White Paper in May 2022, the Government confirmed that it would not initiate a national review of the Green Belt, but remained committed to protecting and enhancing it. It pointed to the Levelling Up White Paper which made a commitment to further “greening” the Green Belt.<sup>87</sup>

## 4.3 Levelling Up and Regeneration Bill (2022-23)

The [Levelling-up and Regeneration Bill 2022-23](#) completed its stages in the House of Commons and is now at Committee Stage in the House of Lords. The Bill and its Explanatory Notes can be found on the [Parliamentary website](#).<sup>88</sup>

The Bill followed the [Planning for the Future White Paper](#) (August 2020) and the [Levelling Up White Paper](#) (February 2022). It supports the Government’s “levelling up” agenda, intended to reduce geographical, economic, social and health inequalities in England.<sup>89</sup> It would also introduce reforms to the planning system to deliver “the right homes in the right places”.<sup>90</sup>

Among other things, the Bill would introduce National Development Management Policies (NDMPs). These would sit alongside local plans in decision-making on planning applications. Any conflict between a local plan and an NDMP would have to be resolved in favour of the NDMP.<sup>91</sup>

NDMPs would set out “general policies on issues that apply in most areas”, while local plans would be refocused to deal with “locally specific matters”.<sup>92</sup>

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<sup>84</sup> DLUHC, [Policy Paper: Levelling Up](#) (PDF), February 2022, page 223; As above, Executive Summary

<sup>85</sup> As above, page 223/224

<sup>86</sup> As above, page 211

<sup>87</sup> DLUHC, [Government response to the Levelling Up, Housing and Communities Select Committee report on The Future of the Planning System in England](#), CP 673, May 2022, paragraph 59/60

<sup>88</sup> [Levelling Up and Regeneration Bill, Bill 006 of 2022-23](#) (PDF) [as introduced]; DLUHC, [Levelling Up and Regeneration Bill: Explanatory Notes](#) (PDF)

<sup>89</sup> DLUHC, [Policy paper: Levelling Up and Regeneration: Further information](#), May 2022

<sup>90</sup> DLUHC, [Policy paper: Levelling Up and Regeneration: Further information](#), May 2022

<sup>91</sup> Clauses 86-87 of the [Levelling Up and Regeneration Bill 2022-23](#) [as brought from the Commons]

<sup>92</sup> DLUHC, [Levelling Up and Regeneration Bill: Explanatory Notes](#) (PDF), paragraph 51

As a result, the Government has argued, NDMPs would help LPAs “produce swifter, slimmer plans by removing the need to set out generic issues of national importance”. It has also argued that local plans would become “easier for communities and other users to digest”.<sup>93</sup>

The Government has said NDMPs would be derived from policies currently set out in the NPPF.<sup>94</sup> On several occasions, it mentioned protecting the Green Belt as one of the issues that NDMPs might cover.<sup>95</sup> In its [consultation on reforms to national planning policy](#) it explained why issues such as preventing inappropriate development on the Green Belt should be covered by NDMPs:

It is our intention that National Development Management Policies would cover planning considerations that apply regularly in decision-making across England or significant parts of it, such as general policies [...] preventing inappropriate development in the Green Belt and areas of high flood risk.

The existing National Planning Policy Framework already contains development management policies of this type that can be significant ‘material considerations’ when assessing planning applications. Currently, these important national policies do not have any statutory status.<sup>96</sup>

[...]

They [NDMPs] will provide greater assurance that important policy safeguards which apply nationally, or to significant parts of England (such as protections for areas at risk of flooding, policy on climate change, and policies to protect the Green Belt) will be upheld with statutory weight and applied quickly across the country, including when any changes are made.<sup>97</sup>

Although the Bill does not include provisions on housing targets, housing targets were repeatedly raised during the debate on the Bill. For example, Theresa Villiers (Con) tabled an amendment (later withdrawn) which would have required any housing targets to be “advisory not mandatory”.<sup>98</sup>

Responding to these concerns, the Government announced in December 2022 that, although housing targets would “remain an important part of the planning system”, it would introduce “new flexibilities”. In a written statement, Michael Gove, the Secretary of State for Levelling Up, Housing and Communities (DLUHC), stated that local housing needs figures “should ... be an advisory starting point, a guide that is not mandatory”.<sup>99</sup>

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<sup>93</sup> DLUHC, [Levelling-up and Regeneration Bill: reforms to national planning policy](#), December 2022, chapter 10, paragraph 11

<sup>94</sup> DLUHC, [Policy paper: Levelling Up and Regeneration: Further information](#), May 2022, Our programme for making better places

<sup>95</sup> [HC Deb 8 June 2022, c911-912](#); PBC Deb, Fourteenth sitting, 14 July 2022, [c454](#)

<sup>96</sup> DLUHC, [Levelling-up and Regeneration Bill: reforms to national planning policy](#), December 2022, chapter 10, paragraphs 3-4

<sup>97</sup> As above, paragraph 11

<sup>98</sup> [Levelling Up and Regeneration Bill: Amendment Paper](#) (PDF), 2 December 2022

<sup>99</sup> DLUHC, [Communities put at heart of planning system as government strengthens Levelling Up and Regeneration Bill](#), 5 December 2022; HC Deb 6 December 2022 [WS415](#) [Update on the Levelling Up Bill]

During report stage of the Bill, the 300,000 figure set out as a target in the Conservative 2019 manifesto was again raised. Lucy Frazer, the then Minister of State for DLUHC, said the Government was “committed to building 300,000 homes” a year, noting “we do need those homes across the country and we need to ensure that young people can get on to the housing ladder”.<sup>100</sup>

## Proposed changes to planning policy and the NPPF

Alongside the changes proposed in the Bill, the Government announced in May 2022 that it would make further changes to planning policy.<sup>101</sup> These changes were later set out in December 2022 by Michael Gove [in a written statement](#). The Government also published a [consultation on the revised NPPF](#) on 22 December 2022 (the consultation will close on 2 March 2023).<sup>102</sup>

In a [policy paper released alongside the Bill](#) in May 2022, the Government had noted that “existing Green Belt protections will remain”.<sup>103</sup> In its [consultation on reforms to national planning policy](#), the Government announced it would amend the NPPF to clarify that LPAs are not required to review and alter Green Belt boundaries to meeting local housing need in full.

[T]here can be confusion about how and when it is acceptable to bring forward a plan that does not meet housing needs in full due to recognised constraints such as Green Belt. As a result, some local authorities are not progressing plans, or are struggling to make their case at examination.

[...]

[T]hrough a change to the Framework’s chapter on protecting Green Belt land, we propose to make clear that local planning authorities are not required to review and alter Green Belt boundaries if this would be the only way of meeting need in full (although authorities would still have the ability to review and alter Green Belt boundaries if they wish, if they can demonstrate that exceptional circumstances exist). This change would remove any ambiguity about whether authorities are expected to review the Green Belt, which is something which has caused confusion and often protracted debate during the preparation of some plans.<sup>104</sup>

## Select Committee response to the Bill

In [letter to the Secretary of State](#) in August 2022, the Chair of the LUHC Select Committee expressed concern that NDMPs would “impose a radical

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<sup>100</sup> HC Deb 13 December 2022, [c954-955](#)

<sup>101</sup> DLUHC, [New Bill to level up the nation](#), Press release, 11 May 2022; DLUHC, [Policy paper: Levelling Up and Regeneration: Further information](#), May 2022

<sup>102</sup> HC Deb 6 December 2022 [WS415](#) [Update on the Levelling Up Bill]; DLUHC, [Levelling-up and Regeneration Bill: reforms to national planning policy](#), December 2022

<sup>103</sup> DLUHC, [Policy paper: Levelling Up and Regeneration: Further information](#), May 2022, Creating beautiful places and improving environmental outcomes

<sup>104</sup> DLUHC, [Levelling-up and Regeneration Bill: reforms to national planning policy](#), December 2022, chapter 7, paragraphs 4 and 9

centralising change upon the current system”. The letter asked for further clarification about areas NMDPs would cover and what they would look like.<sup>105</sup>

In February 2023, the LUHC Committee announced a second inquiry into the proposed reforms to planning policy. Among other things, the inquiry will consider the changes to the NPPF and the approach to developing NMDPs.<sup>106</sup>

## Reaction to proposals in the Bill and to the NPPF

The Royal Town Planning Institute (RTPI) said some councils would support amending the NPPF to clarify that Green Belt boundaries would not need to be reviewed to meet local housing need, viewing the change “as a welcome protection against encroaching on the natural landscape”. Others, however, may see it “as a convenient excuse to not prioritise housing delivery”.<sup>107</sup>

The Local Government Association (LGA) welcomed the proposed changes to national planning policy, noting that “councils and communities are best placed to decide how to build the right homes in the right places in their local areas, with the right infrastructure”.<sup>108</sup>

CPRE welcomed that “mandatory top-down housing targets” were not included in the Bill.<sup>109</sup> Reacting to the consultation on the NPPF, CPRE supported references to make greater use of previously developed ‘brownfield’ land but called on the Government to go further.<sup>110</sup>

In an [evidence session with the LUHC Select Committee](#) in June 2022, Christopher Young KC said there were tensions between the need “to meet the development needs of an area” and requirements to protect certain areas, such as the Green Belt.<sup>111</sup> He argued that not releasing Green Belt land constituted a barrier to development. In London, he said, “rolling out the greenbelt, even a few hundred yards, would deliver millions of new homes”.<sup>112</sup>

The property services group Leaders Romans [called for “a review of the Green Belt”](#).<sup>113</sup> The group argued that the Green Belt had, in part, driven the “north/south divide”, inflating house prices around cities like Cambridge, London, and Oxford. It should thus 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

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<sup>105</sup> Levelling Up, Housing and Communities (LUHC) Committee, [Levelling Up Bill lacks clarity and funding commitments needed to transform local communities](#), 24 August 2022, paragraph 15

<sup>106</sup> LUHC Committee, [Planning policy inquiry launched by Levelling Up Committee](#), 3 February 2023

<sup>107</sup> RTPI, [NPPF: Tackling the housing crisis](#), 26 January 2023 [accessed 7 February 2023]

<sup>108</sup> Laura Edgar, [Government seeks to address slow build-out and strengthen green belt protections](#), *The Planner*, 7 December 2022 [accessed 7 February 2023]

<sup>109</sup> Vicky Marr, [Levelling Up and Regeneration Bill - an update July 2022](#), CPRE, 14 July 2022

<sup>110</sup> CPRE, [Planning reforms consultation: CPRE 'deeply concerned'](#), 23 December 2022

<sup>111</sup> HCLG Committee, Oral evidence: Levelling Up and Regeneration Bill, HC 309, 20 June 2022, Q147

<sup>112</sup> As above, Q125

<sup>113</sup> Property Reporter, [Fresh calls for a review as government announce latest Green Belt statistics](#), 20 September 2022 [accessed 7 February 2023]

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.<sup>114</sup>

The group concluded that “levelling up” would remain “a distant dream” without reforms to the Green Belt. The planning consultancy Boyer also called for Green Belt reform “to deliver homes, including affordable homes, up and down the country, and in doing so, to genuinely level up the UK”.<sup>115</sup>

The law firm Freeths criticised the strengthening of Green Belt protection. It argued that the change would offer a “political green light” to not meet local housing need:

The strengthening of Green Belt policy will be a local political green light to plan for below required needs and the requirement for the cities/urban areas uplift to be contained within these areas has already been demonstrated to be undeliverable in several instances. The proposed changes will only exacerbate existing uncertainty and delays in plan-making.

There has been a failure to provide any assessment, alongside the consultation, which grapples with the chilling conflict between these proposed changes and the, much needed, commitment to delivering 300,000 homes a year by the mid-2020s.<sup>116</sup>

The British Property Federation, an organisation representing companies involved in property ownership, also expressed concern that the proposed changes to the NPPF would mean the “effective removal of targets”, including the 300,000 homes a year target.<sup>117</sup> As a result, it argued, “some areas of the country [will be] unable to meet their population growth”.<sup>118</sup>

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<sup>114</sup> Property Reporter, [Fresh calls for a review as government announce latest Green Belt statistics](#), 20 September 2022 [accessed 7 February 2023]

<sup>115</sup> As above

<sup>116</sup> Freeths, [Planning Freethinking January 2023: NPPF Revisions Consultation](#), 5 January 2023

<sup>117</sup> Royal Institute of British Architects (RIBA) Journal, [Levelling Up Bill: what could the implications be for architects?](#), 26 January 2023

<sup>118</sup> Michael Donnelly, [Planning and development sectors give their reaction to NPPF consultation](#), Planning Resource Magazine [subscription required], 4 January 2023 [accessed 7 February 2023]

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## 5 Earlier proposals for change and previous planning policy

The consultations and proposals discussed here informed and were taken forward in the revision to the NPPF in 2018/9.

### 5.1 DCLG consultation, December 2015

In December 2015, DCLG (now DLUHC) [consulted on a proposal](#) to amend Green Belt policy to allow starter homes to be built in the Green Belt on sites identified in a neighbourhood plan and on some brownfield sites in the Green Belt.

The consultation also proposed to change policy to support the regeneration of previously developed brownfield sites in the Green Belt by allowing them to be developed in the same way as other brownfield land, provided this contributed to the delivery of starter homes, and subject to local consultation.<sup>119</sup>

The consultation estimated that, based on data from the 2010 National Land Use Database, across England there were 500 to 600 hectares of brownfield land in the Green Belt viable for starter homes development and not on open land.

### 5.2 Housing White Paper, February 2017

In a statement in September 2017 on local housing need, the then Housing Secretary, [Sajid Javid, reiterated the Government's stance](#) on the Green Belt.<sup>120</sup> The [Housing White Paper](#), published in February 2017, contained some proposals relating to planning.<sup>121</sup> As the Commons Library briefing on the [planning reforms within the White Paper](#) explains, the White Paper said that the Government's commitment to the Green Belt remained unchanged.<sup>122</sup>

The White Paper also emphasised that authorities should amend Green Belt boundaries only when they could demonstrate that they had examined fully

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<sup>119</sup> DCLG, [Consultation on proposed changes to national planning policy](#), December 2015

<sup>120</sup> [HC Deb 14 September 2017 c1023](#)

<sup>121</sup> DCLG, [Fixing our broken housing market](#), Cm 9352, February 2017

<sup>122</sup> CBP 7896, 8 February 2017



all other reasonable options for meeting their identified development requirements. On planning for the right homes in the right places, the White Paper said that the existing strong protections for the Green Belt would remain.<sup>123</sup>

The Housing White Paper referred to the Government’s manifesto commitment to protect and enhance the natural environment and mentioned the “high bar” protecting the Green Belt.<sup>124</sup> Thus, national policy would (the White Paper said) be amended, to specify when authorities may amend Green Belt boundaries and to require that, when land is removed from the Green Belt, the impact is offset by compensatory improvements.<sup>125</sup>

The circumstances in which, under the terms of the Housing White Paper, changes to Green Belt boundaries to enable development in the Green Belt might be considered were set out in a [PQ reply in October 2017](#).<sup>126</sup> Similarly, in a statement in September 2017 on local housing need, [Sajid Javid reiterated the Government’s stance](#) on the Green Belt.<sup>127</sup>

## 5.3

## Previous Green Belt planning policy

### NPPF 2012

In March 2012, the Government of the time replaced a large amount of the planning guidance with the [NPPF 2012](#). The NPPF set out the Government’s planning policies for England and how it expected them to be applied.

### Planning Practice Guidance 2014

In March 2014, the Government at the time published new Planning Practice Guidance (PPG) to accompany the NPPF and provide greater detail on the policies in it. The PPG stated that unmet housing need in an area was unlikely to meet the “very special circumstances” test to justify development on the Green Belt.<sup>128</sup>

The PPG was updated in October 2014. It reaffirmed the LPAs’ ability to “safeguard their local area against urban sprawl and protect the green lungs around towns and cities”. It also reaffirmed that housing need (including for Traveller sites) did not justify the harm done to the Green Belt by inappropriate development.<sup>129</sup>

<sup>123</sup> DCLG, [Fixing our broken housing market](#), Cm 9352, February 2017, pages 18-22

<sup>124</sup> As above, page 28

<sup>125</sup> DCLG, [Fixing our broken housing market](#), Cm 9352, February 2017, page 28

<sup>126</sup> [PQ 107174, 16 October 2017](#)

<sup>127</sup> [HC Deb 14 September 2017 c1023](#)

<sup>128</sup> DCLG, Planning Practice Guidance, Housing and economic land availability assessment, Methodology – Stage 5: Final evidence base, 6 March 2014 (no longer available online)

<sup>129</sup> DCLG press release, [Councils must protect our precious green belt land](#), 4 October 2014



In December 2014, Brandon Lewis [wrote to the Chief Executive of the Planning Inspectorate](#) about Strategic Housing Market Assessments (SHMAs). This letter set out the relationship between housing figures produced as part of a SHMA and those in a Local Plan and how to consider constraints such as Green Belt land.<sup>130</sup>

There was some disagreement, however, in the planning press about this letter's compatibility with the NPPF.<sup>131</sup> Some commentators suggested that it would allow some LPAs to resist meeting requirements for housing in their area, whereas others suggested that LPAs would still have to demonstrate how they fully met objectively assessed housing need. Ultimately, any disagreement about the letter's compatibility with the NPPF and Green Belt boundaries would be a legal question for the courts to determine.

## NPPF 2019

In March 2018, the then Ministry of Housing, Communities and Local Government (MHCLG) launched a [consultation on updating the NPPF](#). The [draft text for consultation](#) set out how MHCLG proposed to amend and update the NPPF; one of the consultation's headings was "protecting Green Belt land". Among other things, the proposals sought to encourage greater use of brownfield land in the Green Belt.<sup>132</sup> The [Government response to the consultation](#) was published alongside the updated NPPF in July 2018.<sup>133</sup>

The [consultation proposals document](#) set out how the Government's earlier proposals for the Green Belt would be broadened and taken forward, referring to the "high bar" to the release of Green Belt land.<sup>134</sup>

The [Government response to the consultation](#) highlighted that there had been mixed responses to making greater use of brownfield land in the Green Belt. The Government said it would amend the NPPF to incorporate the suggested changes, but it would not review national Green Belt policy or ban all development on the Green Belt.

The NPPF 2019 thus reiterated Government policy and encouraged the use of brownfield land in almost the same terms as the draft revised NPPF. On protecting the Green Belt, it urged LPAs to maximise the use of suitable brownfield sites before considering changes to Green Belt boundaries.<sup>135</sup> The NPPF demanded that there should be "exceptional circumstances" before Green Belt boundaries can be changed<sup>136</sup> and said that inappropriate

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<sup>130</sup> Letter from Brandon Lewis to the Chief Executive at the Planning Inspectorate about [Strategic Housing Market Assessments](#), 19 December 2014

<sup>131</sup> John Geoghegan, [Lewis letter 'may slow plans'](#), Planning Resource [subscription required], 9 January 2015

<sup>132</sup> MHCLG, [National Planning Policy Framework: Draft text for consultation](#), March 2018

<sup>133</sup> MHCLG, [Government response to the draft revised National Planning Policy Framework consultation](#), July 2018

<sup>134</sup> MHCLG, [National Planning Policy Framework: Consultation proposals](#), March 2018, page 20

<sup>135</sup> MHCLG, [National Planning Policy Framework](#), CP 48, February 2019, pages 40-1

<sup>136</sup> MHCLG, [National Planning Policy Framework](#), CP 48, February 2019, paragraph 137

development is harmful to the Green Belt and should be approved only in “very special circumstances”.<sup>137</sup>

NPPF 2019 – including its provisions on the Green Belt – is discussed at more length in the Commons Library briefing [What next for planning in England? The National Planning Policy Framework](#).<sup>138</sup>

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<sup>137</sup> MHCLG, [National Planning Policy Framework](#), CP 48, February 2019, paragraph 143

<sup>138</sup> Commons Library briefing, [What’s next for planning in England? The National Planning Policy Framework](#) CBP 08260, June 2019

## 6 Selected further reading

- [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, [More people are calling for Green Belt reform – and the Government is listening](#), March 2020
- Friends of the Earth, [Let's put the green into the green belt - now there's an idea](#), 8 October 2019
- [Legal landscape: New green belt guidance – short but sweet?](#), The Planner, 19 August 2019
- Glenigan, [Reclassification and development of Greenbelt Land: prepared for CPRE](#), July 2019
- [What's being built on the green belt near you? Chunks of the countryside may be disappearing but it's not always houses and flats to blame, new figures suggest](#), This is Money, 5 July 2019
- Royal Institution of Chartered Surveyors, [What if we readjusted the green belt?](#), 29 May 2019
- [CPRE warning as 460,000 homes to be built on green belt land](#), Planning Resource 6 August 2018
- Landscape Institute, [Landscape briefing: Green Belt policy](#), April 2018
- OECD, [Economic survey of the UK 2017](#) and OECD, [Economic surveys: UK October 2017](#)

- [Housebuilding 'corridors' proposed on London greenbelt - Test new approach for development around cities to address shortages, academics urge](#), Financial Times (subscription), 1 August 2016<sup>139</sup>
- [New homes eroding green belt 'at fastest rate for 20 years': Campaign to Protect Rural England accuses councils of altering boundaries and the government of facilitating the process](#), The Guardian, 25 April 2016
- Local Government Association and Planning Advisory Service, [Planning on the doorstep: the big issues – Green Belt](#), February 2015

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<sup>139</sup> Members and their staff may obtain copies of articles from publications requiring a subscription from the Commons Library on x3666.

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