

A 21st CENTURY GREEN BELT AND COUNTRYSIDE NEXT DOOR

CPRE POLICY POSITION STATEMENT

What do we mean by ‘Green Belt’, ‘the countryside next door’, and the ‘countryside around towns’?

Around 22%, or just under 3 million hectares, of England’s land area consists of countryside within 5km of large towns and cities with populations greater than 100,000¹. This countryside is often the most valuable to people as ‘the countryside next door’. But it is also on the frontline of pressures for development. As the countryside charity, we want to set out ways in which the pressures can be managed, while protecting and enhancing the countryside around towns for future generations.

Of this 3 million hectares, approximately half is designated as Green Belt. There are 14 Green Belts that together cover 13% of England, or just over 1.6 million hectares. The fundamental aim of Green Belt policy is, as set out in the [National Planning Policy Framework](#) issued by Government, to prevent urban sprawl by keeping land permanently open. Linked to this, the local extent of the designation should not be reviewed every time a local plan is reviewed. There are stricter controls over new development, particularly housing, within Green Belts than within most of the countryside.

Green Belt policy was established nationally in a Ministerial circular in August 1955. Evaluations by the Government (in 1993) and the University of Sheffield (in 2009) have found it to have consistently been effective in protecting a largely open landscape free of development around our largest, and some of our most historic, towns and cities.

There are a number of large towns and cities that do not have Green Belts protecting the surrounding countryside, the largest is Leicester (population 300,000). The former Countryside Agency’s ‘Countryside In and Around Towns’ project in the 2000s sought to promote and improve the quality of land within 5km of all settlements with populations greater than 100,000 people. In 2010 CPRE and Natural England produced a comparative analysis of Green Belts and this other land, which covers a further surface area of 1.325 million hectares outside the Green Belts. Green Belts and this further area of land can be considered overall as the ‘countryside around towns’ or ‘the countryside next door’ because:

- 60% of England’s population lives in the urban areas with Green Belts around them, and still more live close to the further non-Green Belt area.
- There are areas of brownfield or previously developed land, but at least 90% of this land overall is classed as previously undeveloped.
- A clear majority - 68% - of this land is farmland.

There are some large towns – for example, Brighton, Plymouth and Teesside – where large tracts of the surrounding countryside is designated Area of Outstanding Natural Beauty or National Park, but not designated as Green Belt. The non-Green Belt areas have overall more nationally designated landscapes and (partly as a result of this) a relatively higher concentration of environmentally sensitive farming schemes.

¹ The figures also include some Green Belt coverage (i) around some slightly smaller, often historic, towns, for example Bath or Burton-upon-Trent; and (ii) otherwise more than 5km from the larger towns and cities, reflecting their larger footprint. The Metropolitan Green Belt, the largest Green Belt, extends in places for 55km beyond the built up area of Greater London but there are a number of additional large and medium sized towns between the conurbation and edge of the Green Belt in any direction.

There are different, and in important respects tighter, controls in Areas of Outstanding Natural Beauty (which overlap to some degree with Green Belts in areas such as the Chilterns and Surrey Hills) and National Parks (where there is very little overlap). For example, automatic rights ('permitted development rights') to change the use of land and buildings in certain cases without applying for full planning permission apply in Green Belts but often not in nationally protected landscapes. Also, the requirement to give great weight to conserving and enhancing landscape and scenic beauty does not appear in Green Belt policy, where the requirement is only to maintain openness.

Compared in other respects to the countryside around other large towns that do not have Green Belts around them:

- the rate of development in Green Belts is between 33 and 50% lower.
- Green Belts have more public rights of way, country parks, and open access land.
- Green Belts have more woodland (including much more Woodland Trust land accessible to the public), and Local Nature Reserves.

Findings from the 'Countryside Quality Counts' surveys by Natural England in 2009 found that the quality (including the historic character) of the landscape was being maintained on more than twice as much Green Belt land (39%) as where it was neglected (18%). However, very little Green Belt land was 'enhancing' its landscape character. Figures are not available for non-Green Belt countryside around towns, but given the higher development rates, problems of divergence or neglect are likely to be higher in those areas.

Current challenges

In common with all questions relating to land use, we will need to combine calls for environmental protection and improvement with an understanding of potential social impacts and the economic context. In recent years economic growth – particularly the type and location of new housing being built - has increasingly failed people and communities as well as the environment. It will be critical that access to, and benefit from, the environment is made fairer and more sustainable in the light of the challenges that we face.

The climate and ecological emergencies put increased pressure on how we use land and addressing them is the overarching priority. They will make the countryside around towns more valuable than ever. International comparisons suggest that Green Belt policy is vital to prevent urban sprawl and the loss of wildlife habitat and productive farmland, some of the most pressing land use challenges facing the world today. Proposals for major development on current Green Belt land are often problematic from a sustainable transport point of view with development sites often being poorly served by public transport. It is also often the case that proposals to release Green Belt land for major development are intended to help fund major roadbuilding proposals, and these proposed roads are also intended to run on Green Belt land, setting up a vicious spiral of harmful, polluting new development.

Intensive farming practices in recent years have also put major pressure on natural systems and have contributed to pollution and significant losses in both habitats and species abundance. Increased centralisation of ownership in the farming industry also raises questions about whether agricultural land will be managed more sensitively in future than it has been in recent years. Land around large towns and cities is particularly vulnerable to degradation, uncontrolled development and pressures for carbon-intensive forms of transport and other infrastructure. The Natural Capital Committee has called for increased wetland and woodland cover in the countryside around towns, in order to play a still more significant role as a carbon sink and as a refuge from increased temperatures.

The countryside around towns has a particular role to play in encouraging **healthy lifestyles and wellbeing**. Green Belts provide a breath of fresh air for at least 30 million people who live in urban areas surrounded by the Green Belts. The particularly strong planning controls provided by Green Belt policy provide a clear visual distinction between town and country on the edge of England's largest and most historic cities, and contribute to a good quality of life within them. Just being able to see an open green landscape is in itself a health benefit².

There are also valuable assets for both formal and informal recreation, and 2016 CPRE research showed that Green Belts have particularly high concentrations of public footpaths and country parks, compared to the countryside as a whole. However, some areas of the countryside around towns have been damaged by major infrastructure development, particularly of major roads. These roads can form a major physical and/or psychological barrier for urban residents who want to access the countryside, and this needs to be addressed. There is a need to understand which areas of the countryside around towns offer a combination of good access with tranquillity (a relative absence of noise and visual pollution), and which areas need improvement in this regard.

There are increasing concerns about **regional imbalances** in England's development, highlighted for example by the UK2070 Commission. Here, too, the countryside around towns can play a vital role as an asset to spur regeneration in the north while acting as a buffer against unsustainable further development in the south. The Metropolitan Green Belt in particular plays a critical planning function of restraining London from growing at the expense of other regions of the country. There is more designated Green Belt land in the northern half (including the Midlands conurbations) of England overall, compared to the south.

The nation faces a crisis of a shortage of **affordable housing**. There are particularly acute issues in some – though by no means all – of the large towns and rural communities surrounded by Green Belts. A number of commentators and free-market think-tanks have called for a relaxation or abolition of Green Belt controls, on the grounds that releasing more land will enable more housing in general to be built where it is most needed, thereby reducing prices. CPRE believes that these arguments are fundamentally misguided. In 2017-18 at least 87% of all the new housing being built in former Green Belt land released from development, and 79% of the housing being allowed in current Green Belt areas prior to any release of the land, was not 'affordable' even by the current flawed Government definition. Significant amounts of social housing, both within and close to Green Belts, have been lost since the 1980s through the Right to Buy without being adequately replaced. More housing that people can afford is urgently needed, both in urban and rural areas. Affordable housing provided through 'rural exceptions' schemes can be beneficial, and CPRE supports these in principle. However, a significant weakening of Green Belt policy in isolation will merely serve to continue current trends.

Our approach

CPRE is the leading organisation that stands up for the Green Belts, and we want to do more to defend and improve the other areas of countryside around towns. We seek to take a holistic approach that encompasses both how land is being used now, largely guided by farming and forestry policies; with how it should be used in future. We want to see better integration of farming and forestry policies with the land use planning system. We have provided extensive evidence of the value of the countryside around towns as it is, and how it could be. We want more people, particularly from a wider variety of backgrounds, to enjoy the benefits of having open countryside close to them. We have a unique capacity to both challenge the critics with robust arguments and harness public support to persuade politicians to maintain or strengthen planning policy. We do this work at both the national and local level.

² UK National Ecosystem Assessment, The UK National Ecosystem Assessment: Synthesis of the Key Findings. UNEP-WCMC, June 2011, pages 18, 23 and 25.

Alongside this, we also intend to draw more attention to the other countryside around large towns that does not benefit from either Green Belt or another national protected landscape designation. This countryside is no less valuable than these areas in terms of the benefits it provides to local people and wildlife, and will also have its own unique character and heritage. We have closely monitored development levels and loss of Green Belt land in the past twenty years. In future we will, subject to available resources, look to more closely track development in the wider, non-Green Belt countryside around other towns in the same way. Our local groups will seek ways to promote and enhance the countryside around towns in a way that best relates to the needs and experiences of local people.

CPRE always takes great care to ensure that any reference we make in the media or in published work to the 'Green Belt' refers only to the planning policy designation and land covered by it. Sometimes the media can mistakenly report any area of countryside or open space that surrounds a town, or is protected from development, as 'Green Belt'.

The concept of Green Belt has strong support amongst the general public, even if they may not always understand the full details of the planning policy. In an opinion poll carried out for CPRE by Ipsos MORI in 2015, a majority (66%) of respondents had some knowledge of Green Belts, and 64% of all respondents went on to agree that existing Green Belt land should be retained and not built on.

What's happening now?

Overall we are strong supporters of the current policies on Green Belt as they are set out in the National Planning Policy Framework (NPPF); we believe there are potential loopholes or weaknesses in the policy which need tightening. Planning reforms have led to weak implementation by local authorities and government, and an increasing use of short term, quick fix responses to housing pressures, rather than making best use of brownfield or previously developed sites in urban areas.

We have been increasingly concerned by research that is indicating an increase in the number of proposals to build on the Green Belt. Most proposals are being approved by local authorities and/or planning inspectors, and these in turn are setting a precedent for further releases elsewhere. We monitor development rates in the Green Belt through our series of State of the Green Belt reports³.

The wider countryside around towns is more likely to have been built on if it doesn't have a Green Belt designation (see above). Although the countryside around towns still feels rural overall (see 'What do we mean?' section above), there is an increasing risk of neglect due to both a lack of long-term investment in good land management, and the increasing likelihood that land could be more profitably built on.

In 2009 voluntary agreements between Government and landowners to improve the environmental quality of land (known as 'agri-environment' schemes) covered a relatively small area (56%, including 53% of the Green Belts) of utilisable agricultural land in the countryside around towns, compared to 67% in the countryside as a whole. The coverage is likely to have reduced in the ensuing decade due to decreasing scheme take-up. Moreover, the long-term funding of these schemes and the wider Rural Development Programme for England (RDPE) is uncertain due to Brexit. There is little or no integration between agri-environment schemes and the alterations of Green Belt land coverage increasingly taking place in the local planning process. Either public-funded improvements could be lost if the land is then developed; or future compensatory improvements for Green Belt loss serve to double count improvements that the public have already paid for.

³ Available at www.cpre.org.uk.

Country Parks and programmes such as the Community Forests have seen significant cuts in public funding. NGOs such as the National Trust, RSPB and the Woodland Trust are increasingly important to the future management of the countryside around towns. Public bodies with a strong remit and a stable income stream could also play a critical role; CPRE believes that much can be learnt in this regard from the example of the Lee Valley Regional Park, which successfully manages a large area of the Metropolitan Green Belt adjoining London.

What should happen

We want to improve the countryside around towns. We want to see more investment into environmentally beneficial land management in the countryside around towns, so it realises its potential as a permanent countryside resource, to the benefit of the nation as a whole. In particular:

- New models for large-scale landscape enhancement should be introduced in countryside around towns that does not already benefit from being part of national or regional park or Area of Outstanding Natural Beauty. The approaches taken by AONB Conservation Boards and regional parks such as the Lee Valley can be more widely applied in the countryside around towns. National Park City initiatives could also effectively play this role: we strongly support the 2019 recommendation of the Government's Landscapes Review that the National Park City idea should specifically embrace Green Belts and other countryside around towns.
- The Government's new Environmental Land Management System, and/or a reformed Rural Development Programme, should include an element of targeting towards schemes that maintain and improve the environmental quality of the countryside around towns. We want to see a future management approach that integrates climate change mitigation, ecological recovery and stewardship of heritage assets. We agree with the Government's Natural Capital Committee that the creation of more new woodland and wetland should be a particular priority for the countryside around towns.
- Access to the countryside around towns should be protected and improved by (i) greater encouragement for individuals through educational or health visits; (ii) developing further physical measures such as the greater use of quiet lanes schemes on rural roads, and of 'green bridges' to overcome motorway barriers for people and wildlife; and (iii) avoiding the building of major new roads in order to avoid the creation of new barriers and sources of pollution.
- Rural economic development programmes should encourage sustainable, small scale agriculture in the countryside around towns, and in particular the increased production of food for local markets. There is also scope to increase the use of social prescribing, for example in the 'Landscape on Prescription' project being piloted in the countryside around Bath.

CPRE believes that promises of improved land management should not in themselves be a reason for weakening controls over development in the Green Belts. This is so that landowners are not given an active incentive to run down their land in the hope of being able to develop it in the future.

We want Green Belt policy to have more teeth. Current Green Belt policy in the NPPF can work well, when it is properly applied and enforced. The NPPF states that Green Belt boundaries can only be altered in 'exceptional circumstances'. CPRE believes that this policy should be further strengthened so that:

- Assisting in the mitigation of, and adaptation to, climate change is a specific purpose of Green Belt policy. Green Belts already provide space for physical protection measures and for the provision of tools of mitigation such as wetlands and woodlands. The NPPF should also make clear that this purpose applies to other countryside around towns that does not have the Green Belt designation.
- Local authorities in areas constrained by Green Belt should not set planning targets for levels of growth beyond that which can be accommodated without harm to the Green Belt.

- Local reviews of Green Belt should only take place if:
 - they are part of a broader, Green Belt-wide development plan or policy;
 - they are primarily based on the five purposes of Green Belt as well as any additional local criteria where relevant and agreed locally, and seek to minimise harm to the Green Belt;
 - the Green Belt boundaries did not significantly change in the previous Local Plan period.
- Suitable brownfield sites in urban and suburban areas are comprehensively identified and prioritised for development, before undeveloped Green Belt land. ‘Prioritisation’ should involve both any public funding necessary to make development viable, as well as the use of planning powers to build out sites in preferred sequences or ‘phases’. If scope exists to regenerate and invest in a deprived area beyond the Green Belt with good public transport links, this will often be preferable to releasing Green Belt land for an urban extension.
- The extent of changes to boundaries in Local Plans must both be shown to be in ‘exceptional circumstances’, and should be kept to a minimum. If the proposed development does not take place within the plan period, then any still open land should default to Green Belt designation and any exceptional circumstances for its re-release be reconsidered.
- Where urban extensions into the Green Belt are decided through the local planning process to be the most sustainable option, CPRE would want them to meet the Smart Growth criteria set out in our Housing Policy Guidance note. In particular any new urban extensions should have medium or high densities, and be well linked to public transport and other social infrastructure so that car use can be minimised. There should also be a significant contribution to meeting social housing need in the local area. It is not enough for major new housing developments merely to be close to a railway station.
- The designation of new Green Belt merely as a direct replacement or ‘swap’ for land removed elsewhere in the Green Belt, should be avoided. Land currently in the Green Belt will normally meet the purposes of Green Belt to a much greater extent than land further from a major urban area being added to the Green Belt. The extent of coverage of Green Belt designation should not be a consideration; rather the purposes for which Green Belt is designated.

There should continue to be a general presumption against development on Green Belt land. Any applicants for planning permission should expect to demonstrate, as per the current NPPF, that there are ‘very special circumstances’ outweighing harm to the Green Belt or any other harm. Within this, however, we believe that such very special circumstances could include rural diversification opportunities that will help provide lasting public benefits across more than one of the following; leisure and recreation, local food production, biodiversity, education, health and wellbeing.

There is currently enough brownfield land suitable for redevelopment for over 1 million new homes across England, at conservative estimates of density, and more new brownfield sites are coming forward all the time. CPRE recognises that there are brownfield sites within the countryside around towns that could be suitable for redevelopment. In such cases development should normally only take place on land with an existing built footprint on it, and not intrude on to valuable open land.

Addressing the affordability crisis will involve a combination of the following measures:

- Giving local authorities more power to invest in and insist on increasing the supply of homes people can afford on planned development sites, many of which are likely to be on suitable urban brownfield land. It is also usually preferable for the affordable housing needs arising within urban areas to be met on more central brownfield locations within the urban areas, because there is access to a wider range of facilities and the need to travel can be minimised. People living in more urban fringe or rural locations are likely to rely more on the use of the private car.

- Making access to the existing stock more equitable, through measures such as acquiring empty homes and preventing the loss of existing social housing stock in rural areas, including the countryside around towns.
- Increasing use of small-scale rural exception site schemes in, and for, rural communities within the countryside around towns. These schemes by definition come outside the normal local planning process but are usually community-led, and most or all of the new houses need to be genuinely affordable. Research in the early 1990s found that this mechanism was relatively little used in Green Belt areas, and this is likely still to be the case as the use of rural exceptions policies has declined across the country in recent years.

A strong case exists for designating whole new Green Belts around and/or between large towns where further growth is planned but where there is a strong risk of urban sprawl and/or excessive encroachment into the countryside. Green Belts should be designated, and development within them controlled, primarily in relation to meeting the planning policy purposes. However, it is also likely to strengthen the case for new Green Belts if they can be used to protect either a concentration of well-managed and valuable areas of land (such as nature reserves), or can help secure natural and active travel connections to important areas of landscape.

New areas of Green Belt should take a form that is appropriate to the local area and be considered in relation to existing or proposed national landscape designations. This may mean that new Green Belts take the form of wedges or fingers rather than an all-encompassing belt. But it may sometimes be beneficial for Green Belts and national landscape designations to overlap, for example if particularly tight controls are needed on small-scale householder development in order to maintain a sense of openness in the landscape. New Green Belts should be agreed by all the local authorities within whose area the Green Belt would be designated. CPRE local groups are making the case for new Green Belts around Norwich and Southampton.

There may also be a strong case to further extend or create new national landscape designations to cover areas of countryside around large towns. This will depend on overall landscape quality and the local context, and also on whether new financial resources can be found to sustain a programme of conservation and enhancement in these areas.

CPRE
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