



Campaign to Protect
Rural England
Standing up for your countryside

The State of the Green Belt



July 2018

1. Introduction

The Green Belt covers 13% of England and for more than 30 million people is their countryside next door,ⁱ providing a valuable escape from city life, mental health benefits and opportunities for outdoor recreation opportunities. Despite attacks from some politicians, think tanks and developers, the public consistently rally to defend the Green Belt.ⁱⁱ Yet this valuable asset is increasingly under threat from development.

Green Belt is a planning designation designed to:

1. reduce urban sprawl
2. prevent neighbouring towns from merging
3. protect the character of historic settlements
4. encourage urban regeneration
5. assist with safeguarding our countryside

In doing this, the Green Belt has numerous benefits, from allowing us to grow food near where we live, to encouraging investment in our towns and cities and therefore keeping cost of infrastructure down. Green Belts also contain a significant proportion of our nature reserves with more than double the national density of public rights of way, thus protecting our valuable environment and enabling access to countryside nearby.ⁱⁱⁱ

The value of the Green Belt in preventing urban sprawl is easy to see when looking at cities without them. For example, Los Angeles stretches for 50 miles in one direction, contributing to the burden of over \$1trillion that urban sprawl imposes on USA society.^{iv} And, after Sydney abolished its Green Belt in 1963, the city had severe issues with urban sprawl diminishing the farmland available to feed the city, and still faces challenges in balancing urban growth with environmental considerations.^v

Green Belt, greenfield and brownfield definitions

Green Belt is a planning designation. It is land around some of our largest and most historic, towns and cities, covering all land uses.

Brownfield, or previously developed land, is, generally land that has been built on before. A full definition can be found in the National Planning Policy Framework.¹ Brownfield land can also be found within the Green Belt.

Greenfield land has never been built on before. Not all greenfield land is designated as Green Belt.

Building in the Green Belt

Development in land designated as Green Belt is normally considered inappropriate and is only allowed in 'very special circumstances', according to the National Planning Policy Framework (NPPF). Redevelopment of suitable brownfield land and buildings in the Green Belt can be acceptable where the proposed development keeps within the footprint of previous development.



Local authorities can also release land from the Green Belt for development, but only through a review as part of a local plan, where there are 'exceptional circumstances'.

The Campaign to Protect Rural England fears that the bar for both 'very special circumstances' and 'exceptional circumstances' is set too low. Successive governments have emphasised their commitment to protecting the Green Belt. But despite such rhetoric, land loss from the Green Belt has accelerated under both routes since the NPPF was introduced.

At the launch of the draft revised NPPF, in March 2018, Prime Minister Theresa May declared that 'the answer to our housing crisis does not lie in tearing up the Green Belt'. Over the past six years, CPRE's research supports May's claim that 'too many local authorities and developers have been taking a lax view of what exceptional means, [...] allocating Green Belt sites for development as an easy option rather than a last resort'.^{vi}

With a commitment to strengthening protection of the Green Belt central to the recent revisions of the NPPF,^{vii} it is a good time to take stock of the state of our Green Belt.

Green Belt threat breakdown

This year's report will set out three different ways that Green Belt land can be lost to housing:



1. What has been happening

Using the Government's Land Use Change Statistics to show how much Green Belt land has been lost to residential development.



2. What is about to happen

Using data on planning applications granted on land that is currently Green Belt, gathered by independent consultants, Glenigan.



3. What could happen in the future

Looking at emerging and adopted local plans and the land they are currently proposing to release from the Green Belt for housing

2. Executive summary

Our key findings show that the government has broken its promise to secure the Green Belt. The NPPF has failed to protect greenfield land here from inappropriate development. Furthermore, building on the Green Belt will not solve the crisis in affordable housing, despite some commentators' arguments that simply building more makes housing affordable.

Developments in the Green Belt are an inefficient use of our finite land resources and delivering large scale developments in the Green Belt is costly and more difficult.

The government must prioritise redevelopment of suitable brownfield land instead, which can provide space for more than a million homes across England and is almost always a more sustainable alternative than eroding the Green Belt.

The loss of valued Green Belt land looks set to continue as councils come under increasing pressure to build new homes at any cost.

2.1. Key findings:

1. The government's own data shows that there has been a 62% increase in the loss of greenfield Green Belt land since 2013, with 315 hectares lost in 2016/17 alone.
2. The number of housing units completed on greenfield development in the Green Belt has risen from zero in 2009/10 to 3,387 in 2017/18.
3. Landowners and developers have submitted the second highest number of speculative planning applications on greenfield land in the Green Belt since 2009. Over 24,000 housing units have been approved on greenfield sites within the Green Belt in that time.
4. Huge amounts of greenfield land designated as Green Belt has been released or included in councils' local plans since 2013, representing enough land for almost 460,000 housing units.
5. Of the homes approved on greenfield land, only 27% meet the government's definition of 'affordable'. This is below the average target of 31% across local planning documents for development on such sites.
6. Building in the Green Belt is relatively inefficient with just 21 dwellings built per hectare compared with 32 dwellings per hectare outside of the Green Belt.
7. Local authorities with Green Belt land have enough brownfield land for over 720,000 homes so there is no reason for them not to be prioritising brownfield development.
8. An increase in housing targets is projected for one-third of local authorities with Green Belt land.

Key Recommendations:

- National and local planning policies and decisions should recognise the Green Belt's wide variety of benefits, but focus on ensuring that they continue to fulfil their purpose by:
 - Following through on commitments to strengthen the exceptional circumstances test by prioritising brownfield sites within the revised NPPF
 - Committing to establishing long-term Green Belt boundaries, to be reviewed no more than every 15 years
 - Carrying out any Green Belt review at a strategic level so that opportunities to manage and enhance the Green Belt for public benefit are identified, and any areas released are those least damaging to the five purposes of the Green Belt
 - Preventing speculative development in the Green Belt
- National government should:
 - Develop clear guidance for local authorities on housing requirements to protect designated land
 - Support the creation of new Green Belts where local authorities have established a clear need for them
 - Ensure departments work together to direct economic and housing growth towards areas with capacity for redevelopment on brownfield sites



3. Methodology

How CPRE identified threats to the Green Belt:

- Evaluate existing alterations in the Green Belt through the Land Use Change Statistics
- Review planning applications to provide an assessment of the development about to happen on Green Belt land
- Find land released from Green belt designation in local plans to prepare for future developments

The main sources used to collect data on Green Belt threats are below.

<p>Land Use Change Statistics (LUCS) Source: Ministry of Housing, Communities and Local Government (MHCLG) Years: 2013/14-2016/17 (published May 2018) Land use: greenfield and brownfield Key information: land take; proportion of new development in the Green Belt; density</p>	<p>Planning applications Source: Glenigan research Years covered: 2009/10-2017/18 Land-uses covered: greenfield and brownfield Key information: approved Green Belt applications, affordable housing figures All applications of more than 10 homes.</p>
<p>Local plans Source: CPRE Network Years: current plans at 1 July 2018 Land use: greenfield only where possible Key information: loss of Green Belt through reviews; affordable housing; density</p>	<p>Brownfield registers Source: State of Brownfield 2018 (from Local authority data)</p> <p>Housing need figures Source: MHCLG</p>



South and West Yorkshire Green Belt

Photo credit: Liz Reynolds

4. Results

4.1. What has been happening?

Recent government land use statistics show that housing development in the Green Belt has increased for another consecutive year (Figure 1), despite the government’s commitment to protecting the Green Belt.

Since the NPPF was introduced, with the ‘purpose of helping achieve sustainable development’, at least 1,007ha of greenfield Green Belt land has been developed for housing. On average, annual loss of this land to housing has tripled since 2012. So it is highly likely that the NPPF has increased greenfield development in the Green Belt, rather than contributing to sustainable development and encouraging reuse of suitable brownfield land.

Nearly 400-football fields worth of greenfield Green Belt land has been lost to housing in the past year alone.

London Metropolitan Green Belt



Photo credit: Sarah West

The transformation of greenfield land in the Green Belt into residential development shows no signs of slowing. In the past year alone, 315ha of greenfield Green Belt land, the equivalent of nearly 400 football pitches, was lost to residential development, an increase of 17% since 2016 and 62% since 2013 (Figure 1).

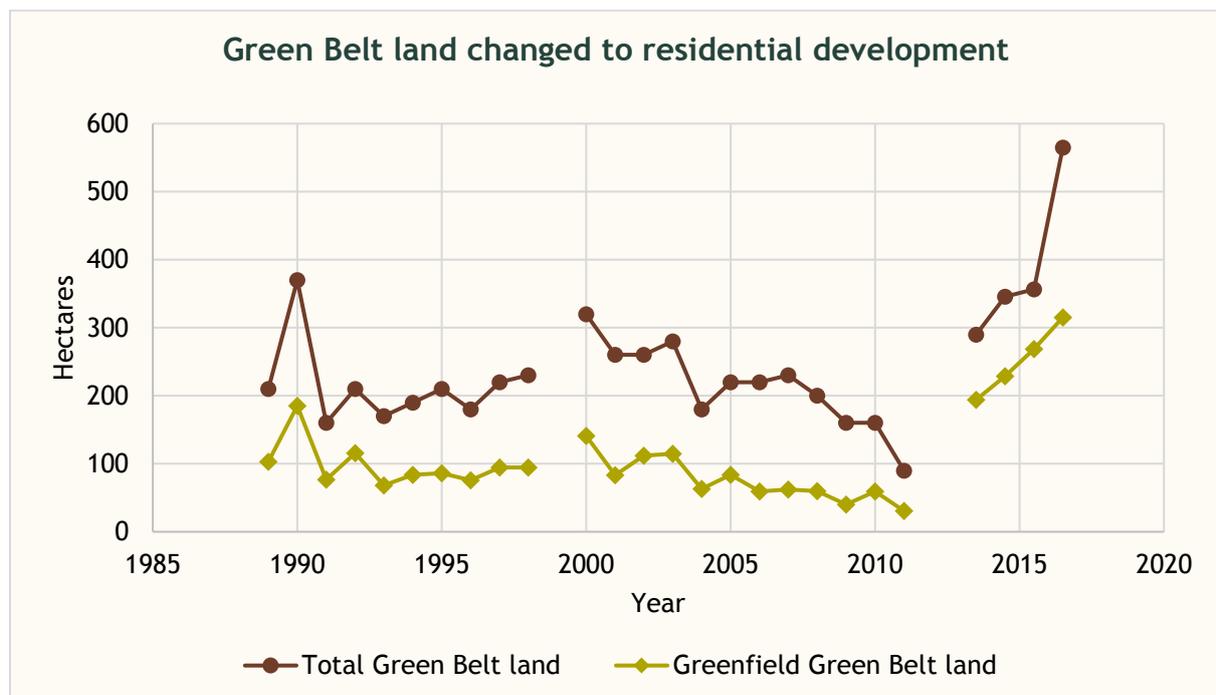


Figure 1: Total land area of Green Belt turned over to residential development per year. The years 1999 and 2012 had no data and new methodology was implemented from 2013^{viii}

According to this data, Green Belt loss is happening across the country. Of all the local planning authorities with Green Belt land, 96% have lost some to housing in the past four years. The seven authorities without residential Green Belt development all had less than 2.5% Green Belt within their boundaries.

The planning application data from Glenigan provides an insight into the number of housing units completed in the Green Belt since 2009/10. This is particularly important given that the government argues that LUCS before and after 2013 are not comparable. However, Glenigan broadly corroborates the significant increase in greenfield Green Belt development shown in the LUCS data (Figure 1), suggesting that using LUCS is valid. Development within the Green Belt has been growing. Just 70 units were built in 2009/10 compared to 8,143 units in 2017/18. Redevelopment of brownfield sites in the Green Belt has been largely responsible for that growth. However, a significant upturn in 2017/18 saw more than 3,300 housing units completed on greenfield sites in the Green Belt, compared to none in 2009/10 (Figure 2).

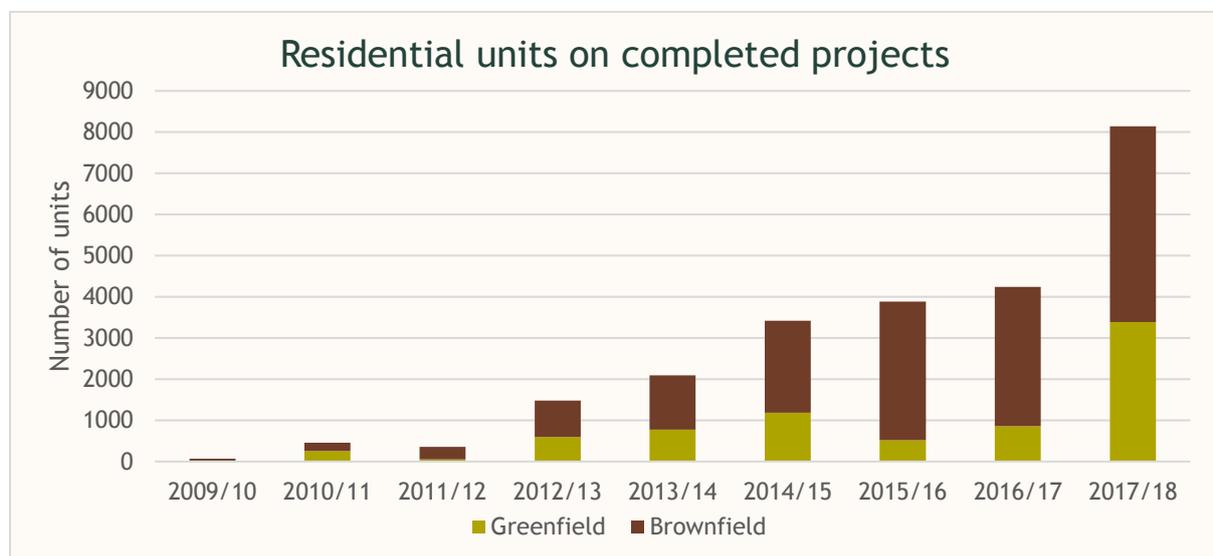


Figure 2: number of residential units on completed development projects^{ix}

CPRE supports redeveloping suitable, well-located brownfield sites in the Green Belt that do not have high environmental or heritage value. The NPPF makes an allowance for redevelopment where the impact would not be greater than the existing site. It is unclear whether all of the development existing or planned for brownfield sites in the Green Belt necessarily follows these principles; CPRE is considering further research in this area.

4.2. What is about to happen?

An analysis of planning applications within the Green Belt shows that there has been no abatement. Across all land types, 2017/18 was the highest year on record for both the number of applications and the units they represent, with 351 applications representing 38,304 housing units submitted in 2017/18. (Total figures are in the table in the annex.)

For greenfield applications, 2017/18 was the second highest year on record with 90 applications covering 16,728 units (Figure 3). The rapid increase in greenfield applications since the NPPF came into force in 2012 is clear. Across the nine years of the analysis, greenfield applications represent 27% (536) of the total number of applications submitted, with 40% (81,749) of the units applied for on greenfield sites (see Annex). This suggests that applications on greenfield sites are for much larger developments than brownfield sites.

There has been a **rapid increase** in planning **applications on greenfield** land in the Green Belt since the NPPF.

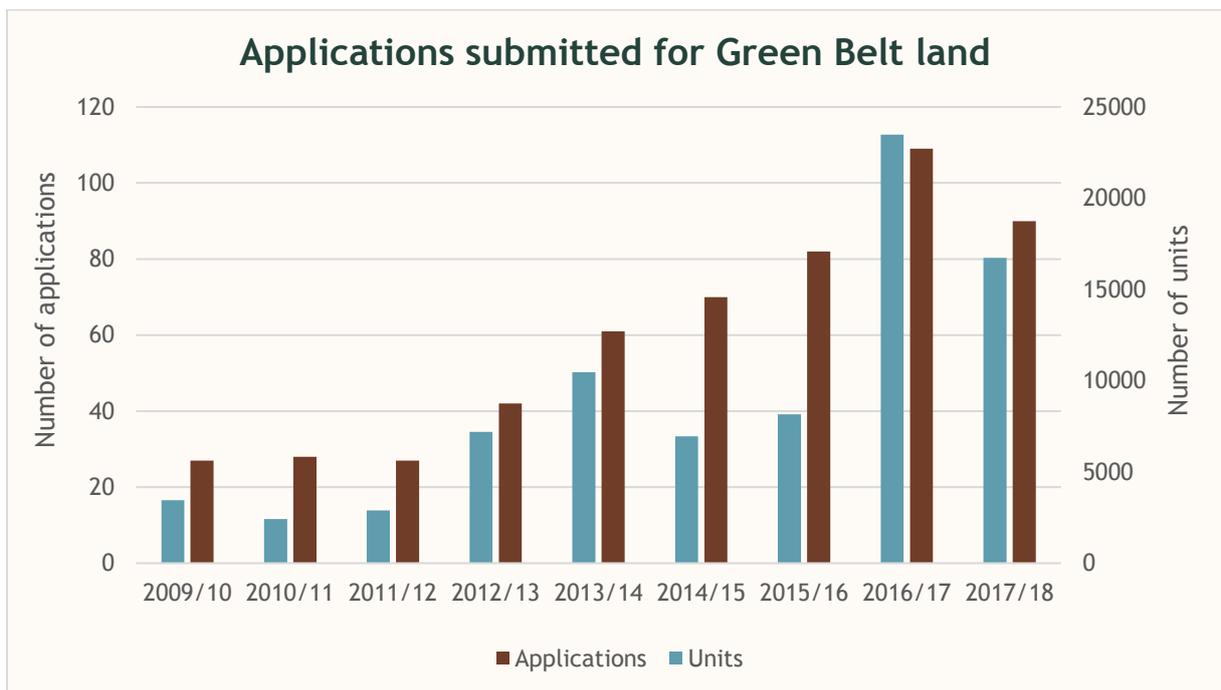


Figure 3: The number of submitted applications and the housing units those applications represent for greenfield developments in the Green Belt 2009/10 to 2017/18^x

The recent increase in the number of applications means that a significant proportion (31%) of them have still to be decided, particularly those received in the past two years. More than 24,000 units (66% of all units approved) have been approved on greenfield sites in the Green Belt across 186 (53%

of all applications nationally) applications since 2009/10. This compares to 80% of all major residential applications approved nationally.

4.3. What could happen

Building and planning applications on the Green Belt are only a fraction of this story. When local plans are reviewed, Green Belt land can lose its status. Therefore, the Green Belt is not only threatened directly by planning applications, but by local authorities choosing to release Green Belt land for housing.

Currently, local authorities plan to release Green Belt land with capacity for 459,570 units. This represents an increase of 8%, or approximately 35,000 units, in a single year (Table 1 and Table 2). This figure is more than three times the figures proposed in draft regional plans in 2009, before they were abolished, partly because, in 2010, the Coalition government considered that too much land would be lost from the Green Belt.



Photo credit: Chris Howe

Table 1: number of houses being planned for land released from the Green Belt in local plans

Date	Approximate number of houses proposed for land released from the Green Belt
2009 (draft regional plans)	147,000
August 2012	81,000
August 2013	150,000
March 2015	219,000
March 2016	275,000
May 2017	425,000
June 2018	459,000

Table 2: regional breakdown of the number of houses planned for land released from the Green Belt in local plans

Region	June 2018	May 2017	Percentage change from last year to this year
East of England	99,009	65,277	+52%
East Midlands	19,105	18,475	+3%
London and South East	72,711	71,062	+2%
North East	13,825	12,650	+9%
North West	97,198	97,528	-0.01%
South West	32,810	32,030	+2%
West Midlands	75,997	72,650	+5%
Yorkshire and the Humber	48,915	55,000	-11%

London Metropolitan Green Belt



5. Further analysis

5.1. Housing targets putting pressure on the Green Belt

The proportion of Green Belt land lost to housing is likely to continue to increase, judging by the new methodology for calculating housing need that was published last year, ahead of the draft NPPF, and which is expected to be implemented this autumn. While the government has stated this is the ‘first step’ in calculating local authority housing requirements, there is a lack of guidance on how the following stages can take account of other considerations, such as Green Belt.^{xi} Consequently, boundaries will continue to be amended to accommodate these new figures.



Over half of local planning authorities with Green Belts will have to deliver more housing using the new calculation. Increases in housing will have a disproportionate impact on local authorities within the London Metropolitan Green Belt, with a projected average increase of 22% in housing need. This compares to an average increase of 8.5% nationally (of 237/326 local planning authorities which have published the data). This is because the new method of calculation combines household projections with an indicator on the affordability of housing. This entrenches the current unequal distribution of growth across the country.^{xii} The worst hit authority will be Epping Forest, given that it has 93.5% of its area in the Green Belt and an expected increase of 80% in housing need (Table 3).



Photo credit: Sarah Greenwood



Photo credit: Harriet Williams



Table 3: Local planning authorities with more than 50% of authority land in the Green Belt and over 25% increase in housing need based on the new calculation method

Local Planning Authority	Green Belt	% of local authority land area in the Green Belt	% increase in housing need with the new calculation
Brentwood	London (Metropolitan)	89.5	25
Chorley	North West	72	52
Dartford	London (Metropolitan)	56.5	33
Elmbridge	London (Metropolitan)	58	29
Epping Forest	London (Metropolitan)	93.5	80
Gravesham	London (Metropolitan)	77.5	40
Havering	London (Metropolitan)	53.5	33
St Albans	London (Metropolitan)	81.5	43
Tandridge	London (Metropolitan)	94	37

Additionally, the government is introducing a housing delivery test, which would allow more planning applications through^{xiii} and could increase targets by 20% if housing is not built within set timeframes.^{xiv} This would probably drive local authorities to release more land for housing, and where targets are not met - and thus local plans declared 'out-of-date' - speculative applications would go up.

5.2. The type of housing being built: affordable housing in the Green Belt

Less than 22% of housing units with planning permission meet the government's definition of affordable, with 27% on greenfield land and 19% on brownfield. The total proportion of affordable housing units in the Green Belt has not changed since 2009/10. This compares to an average of 31% in affordable housing targets set out in local plans (from 87 authorities with the data), so current Green Belt development is falling short of planned minimum levels by nearly a third.

Lower provision of affordable housing is usually justified by claims that land is more expensive or other development costs are higher than had been estimated when policy requirements were set. But greenfield land is the cheapest form of land, requiring the least cost to make it 'shovel ready', and so should make the provision of affordable housing more 'viable' - or so developers usually argue when opting not to build on brownfield sites. The value of greenfield land in the Green Belt should also, in theory, be kept in check as a result of strict planning policies enforcing the permanence of the Green Belt - and thus reducing the likelihood of development being granted planning permission. So landowners and developers should be offering still higher proportions of affordable housing in order to demonstrate the 'very special' or 'exceptional' circumstances needed to justify the development or release of Green Belt land. Yet our figures show that fewer affordable houses are being provided.

Our previous research with Shelter has shown how viability assessments are used to negotiate lower affordable housing contributions. This evidence demonstrates that this practice has occurred even in the Green Belt.^{xv}

For completed housing projects in the Green Belt, 25% meet the definition of affordable. On greenfield developments in the Green Belt, 30% of housing units are affordable. The proportion of affordable units on greenfield sites in the Green Belt has decreased from 100% in 2010/11 (no homes were completed in the Green Belt in 2009/10) to 28% in 2017/18.

Definition of affordable

This report recorded the number of homes defined as affordable under national planning policy at the time. The National Planning Policy Framework defines affordable housing as social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.

5.3. Density and the Green Belt

Not only do Green Belt developments remove our valuable countryside, but do so at wastefully low housing densities. This year the average density of Green Belt development was 21 dwellings per hectare (dph), compared to 32dph elsewhere. This

21 dph : 32 dph

The density (dwellings per hectare) of residential development in the Green belt, compared to outside the Green Belt last year.

has increased from an average of 16dph in the Green Belt in the three years previously, according to the latest LUCS. This is still shockingly low, especially since the minimum density was previously set at 30dph. Furthermore, average density targets in local plans for building in the Green Belt were 31dph (from 27 local authorities investigated that had a density policy in their local plan). Therefore, Green Belt developments are not reaching even the minimum density standards set out in local plans.

By their nature, Green Belt developments are generally outside the built-up area of towns and cities resulting in a lack of infrastructure and services that would enable higher density development. This suggests that Labour MP Siobhain McDonagh's campaign for a million homes to be built on 20,000ha of London's Green Belt land near train stations on the outskirts of London, at an average of 50dph, is unrealistic. Furthermore, the additional infrastructure would often be funded through planning (or 'section 106') agreements, thereby reducing the scope to deliver affordable housing through such agreements.

5.4. Brownfield alternatives



Widnes, Cheshire

4.6 years

The average supply of suitable brownfield land in local planning authorities with Green Belt land.

There is enough suitable brownfield land to provide a minimum of 720,000 homes (more than 23,500ha) in local planning authorities with Green Belt land (from the 181 local authorities that published brownfield land registers out of the 185 local authorities that have Green Belt land). More than 440,500 of these homes could be built within the next five years (from 163 local authorities with

the data). On average, local planning authorities with Green Belt land have 4.6 years of housing supply in suitable brownfield land.

Case study

Hillingdon, London, has Green Belt but has enough suitable brownfield land outside the Green Belt to build 4,200 homes within the next five years, which, given housing need in the area, is actually enough to supply housing for seven years. Despite this, development continues to go ahead within the Green Belt. Over a quarter of new housing units built between 2013 and 2017 in Hillingdon were in the Green Belt.

Other developments in the Green Belt

Residential developments in the Green Belt only tell part of the story. In fact, in terms of development, housing is just the tip of the iceberg.

The LUCS show that in the past four years, more than 11,000ha of Green Belt land have been lost to commercial and industrial development and over 7,000ha of this was on greenfield land. In the past nine years, Glenigan recorded over 2,300 commercial and industrial applications to build on the Green Belt, including 477 on greenfield sites. Since 2009, 80% of greenfield applications that have been decided on have been approved, amounting to 328 applications. And the numbers have gone up over time, although not as sharply as residential applications.



6. Conclusion and recommendations

Green Belts remain under major threat and the pressure looks set to increase. National planning policy is increasingly ineffective, meaning that land is lost to residential developments that rarely meet local housing needs. Building here is also wastefully inefficient, with extraordinarily low densities of development in these sites, when brownfield land has huge potential to deliver at least 720,000 new homes in Green Belt local authorities alone.



There are now campaigns for designating new Green Belts around Norwich and Southampton to support a more strategic approach to accommodating growth while protecting the character of villages, towns and cities and the countryside around them.

The NPPF was reviewed this spring. The final revisions have yet to be published, but we hope that redefining ‘exceptional circumstances’ for Green Belt boundaries in local plans will strengthen Green Belt protection and ensure that its release is in genuinely extraordinary circumstances. Nonetheless, unless other aspects of the NPPF allow planning interventions at the national and strategic levels to redirect housing and economic growth away from protected areas to those with more brownfield opportunities, then councils will continue to be forced to sacrifice their communities’ local countryside.

Despite the number of benefits Green Belt land supplies, there are increasing calls to build on it, from releasing ‘scruffy’ bits of Green Belt to abolishing it completely. However, these calls overlook the importance of the permanence of the Green Belt in discouraging speculative applications for bad development and encouraging urban regeneration. They also see Green Belt as merely land waiting to be built on, ignoring the wider benefits - such as providing valuable farmland, offering recreation opportunities and increasing mental wellbeing,

Instead, we look to the national government to take a lead in ensuring that national planning policy is upheld, by providing clear leadership and guidance, to ensure that our Green Belt can continue to provide the countryside next door for urban communities.

We recommend that:

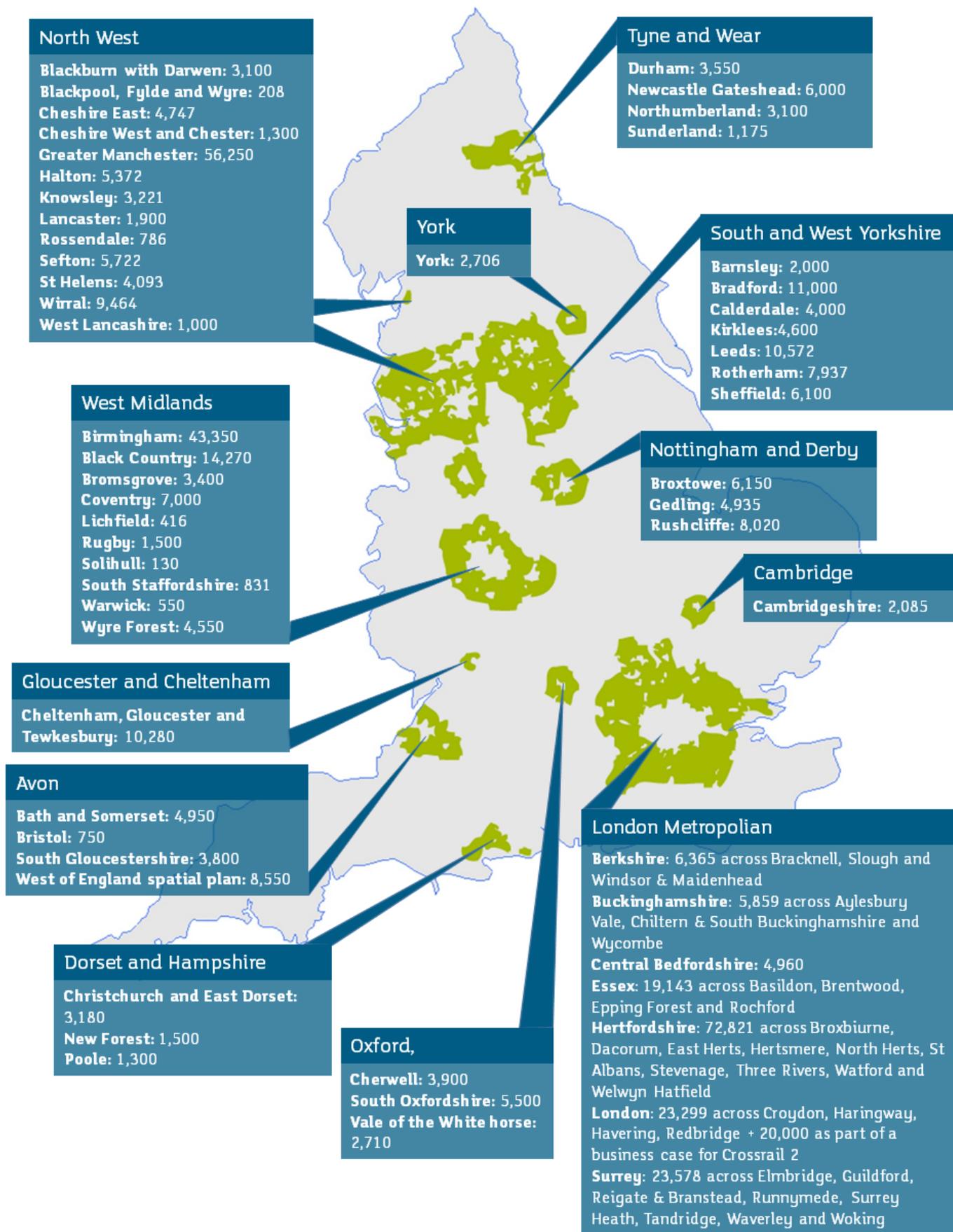
- National and local planning policies and decisions should recognise the Green Belt's wide variety of benefits, but focus on ensuring that they continue to fulfil their purpose by:
 - Following through on commitments to strengthen the exceptional circumstances test by prioritising brownfield sites within the revised NPPF
 - Committing to establishing long-term Green Belt boundaries, to be reviewed no more than every 15 years
 - Carrying out any Green Belt review at a strategic level so that opportunities to manage and enhance the Green Belt for public benefit are identified, and any areas released are those least damaging to the five purposes of the Green Belt
 - Preventing speculative development in the Green Belt
- National government should:
 - Develop clear guidance for local authorities on housing requirements to protect designated land
 - Support the creation of new Green Belts where local authorities have established a clear need for them
 - Ensure departments work together to direct economic and housing growth towards areas with capacity for redevelopment on brownfield sites



7. Annex

Annex table 1: Glenigan figures. Total figures from 2009/10 to 2017/18

	Application number	Number of units
Total number of applications	1961	206,852
Total number of applications decided upon	1358	102,111
Total number of applications approved	873	64,960
Total number of projects completed	490	24,154
Total number of greenfield applications	536	81,749
Total number of greenfield applications decided	350	36,518
Total number of greenfield applications approved	186	24,081
Number of greenfield applications completed	107	7,627
Proportion of applications on greenfield	27%	40%
Proportion of approvals on greenfield	21%	37%
Proportion of completions on greenfield	26%	32%
Proportion of greenfield applications approved	53%	66%
Proportion of brownfield applications approved	61%	68%
Proportion of greenfield approvals completed	58%	32%
Proportion of brownfield approvals completed	57%	43%



Annex figure 1: Break down of the approximate number of houses for land proposed to be released from the Green Belt in local plans for each Green Belt with identified threats

-
- ⁱ MHCLG (2017) Green Belt Statistics <https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2016-to-2017>
- ⁱⁱ 64% of people agree that the Green Belt should be protected, whilst only 17% disagree. CPRE (2015). <https://www.cpre.org.uk/media-centre/latest-news-releases/item/4033-60th-anniversary-poll-shows-clear-support-for-green-belt>
- ⁱⁱⁱ CPRE (2016) *Nature Conservation and Recreation Opportunities in the Green Belt*. <https://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4452-nature-conservation-and-recreational-opportunities-in-the-green-belt>
- ^{iv} Litman, T. (2015) Analysis of Public Policies That Unintentionally Encourage and Subsidize Urban Sprawl. Victoria Transport Policy Institute. *New Climate Economy*.
- ^v The University of Melbourne (2015) *Melbourne at 7 million: losing farmland due to urban sprawl*. <https://research.unimelb.edu.au/foodprint-melbourne/publications/melbourne-at-7-million-losing-farmland-due-to-urban-sprawl>
- ^{vi} PM Theresa May (March 2018) *PM speech on making housing fairer: 5 March*. <https://www.gov.uk/government/speeches/pm-speech-on-making-housing-fairer-5-march>
- ^{vii} Brokenshire, J. (2018) *Housing Policy: Written statement - HCWS925*. <https://www.parliament.uk/business/publications/written-questions-answers-statements/written-statement/Commons/2018-07-24/HCWS925/>
- ^{viii} MHCLG (2018) Land use change statistics 2016 to 2017. <https://www.gov.uk/government/statistics/land-use-change-statistics-2016-to-2017>
- ^{ix} Glenigan (2018) *The use of greenfield and brownfield land in Greenbelt housing and commercial projects*.
- ^x Glenigan (2018) *The use of greenfield and brownfield land in Greenbelt housing and commercial projects*.
- ^{xi} DCLG (2017) *Planning for the right homes in the right places: consultation proposals*. Para 9. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/652888/Planning_for_Homes_Consultation_Document.pdf
- ^{xii} For more information, please see CPRE's consultation response to the Government's National Planning Policy Framework consultation: <https://www.cpre.org.uk/resources/housing-and-planning/planning/item/4846-cpre-response-to-the-national-planning-policy-framework-consultation>
- ^{xiii} Via the introduction of the 'presumption in favour of sustainable development'. Page 6 of the National Planning Policy Framework draft text: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf
- ^{xiv} MHCLG (2018) *National Planning Policy Framework: Draft text for consultation*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf
- ^{xv} Grayston, R and Pullinger, R. (2018) *Viable villages: closing the planning loophole that undercuts affordable housing in the countryside*. <https://www.cpre.org.uk/resources/housing-and-planning/item/4781-viable-villages-closing-the-planning-loophole-that-undercuts-affordable-housing-in-the-countryside>