A COUNCILLOR'S BRIEFING

HOW TO STOP THE GOVERNMENT HARMING NATURE

(BUT STILL SOLVE THE HOUSING CRISIS)

COMMUNITY PLANNING ALLIANCE
www.communityplanningalliance.org

HOW TO PROTECT GREEN SPACES FROM OVERDEVELOPMENT

This briefing sets out the case against uncontrolled greenfield development and summarises the tools available to councillors to protect green spaces, prioritise brownfield land, and ensure any new development genuinely serves communities.

This matters to voters. In April over 220 community groups participated in our national Day of Action for nature, parks and greenspaces, demonstrating the importance of protecting our environment to voters.

We have written this for councillors, to enable you to push-back against inappropriate development. You will not be alone! We set out in this paper how Enfield, Cotswolds, Royal Borough of Kensington and Maidenhead are just some councils putting up a fight.

We owe it to future generations to leave their countryside and nature intact, and to take food security seriously. The build, baby, build agenda is not only irresponsible – it does not solve the housing crisis. With three million homes available on brownfield, in empty homes and in unbuilt planning permissions, there is simply no excuse to build on our precious green spaces.

In the spirit of the Community Planning Alliance, we'd like to crowdsource information for this document. Please email us on **communityplanningalliance@mail.com** if there's anything you think we should include in future editions.

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DEVELOPMENT THREATENS GREEN SPACES AND DOES NOT SOLVE THE HOUSING CRISIS

The Government's housebuilding programme, which has a target of 1.5 million new homes, and proposals for new towns of over 10,000 homes each, will result in:

• Wholesale loss of productive agricultural land, irreplaceable habitats and green spaces valued by communities: 150,000 hectares of farmland will be under concrete by 2050 under DEFRA's estimate.

• Car-dependent, low-density sprawl that fails to support public transport or active travel.

• Development that outstrips infrastructure — schools, roads, water, sewage and healthcare — causing lasting damage to existing communities.

• Affordable housing targets undermined by viability arguments, and social housing undelivered.

• A democratic deficit as powers are removed from communities and targets forced on them.

The Community Planning Alliance's **Homes for Everyone**[1] campaign makes a compelling and evidence-based case that there is no need to build on greenfield land to meet housing need. The 1.5 million homes target can be met more than twice over by prioritising brownfield land, empty homes, disused commercial buildings and unbuilt planning permissions, while also protecting the countryside and green spaces.

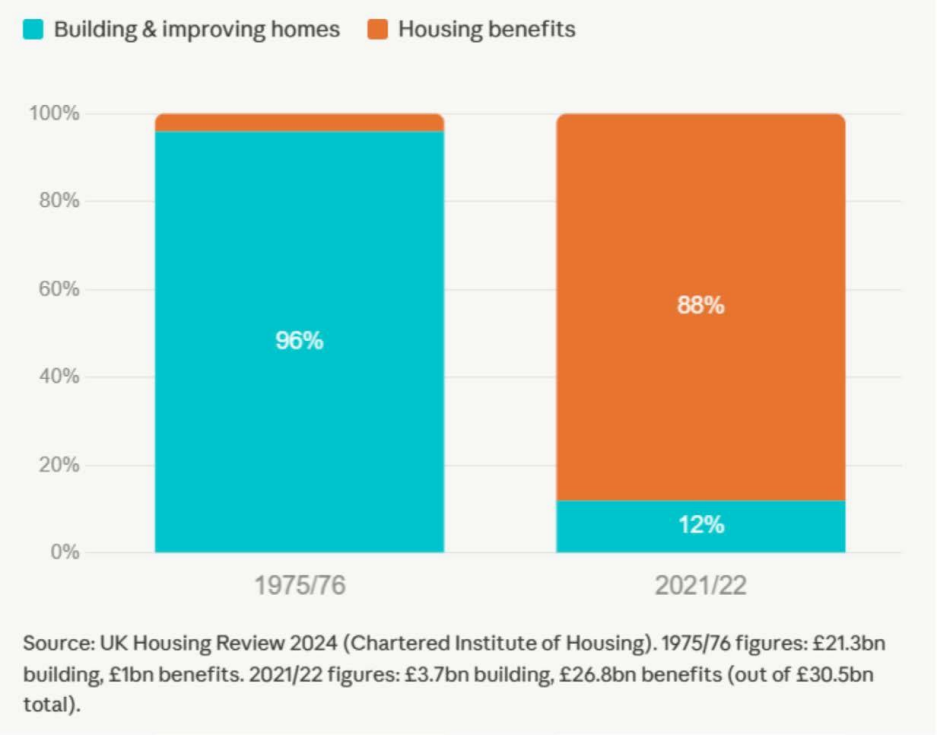
Targets don't solve the housing crisis

The housing crisis is not solved by the Government asking developers to build more housing, or by relying on the private sector to deliver 'affordable' housing. The high targets being imposed on your council by the Government are meaningless. They will not force housebuilders to build, and they will not make housing affordable. Developers only build what they can sell, and at a margin which they are happy with.

Likewise, new towns are not a magic bullet. They require significant state funding to succeed, and that is not forthcoming. We include a 'New Towns Checklist' in Appendix A so that if a new town is proposed in your ward or division, you can hold the promoter to account.

[1] https://HomesForEveryone.org/

Government funded social housing is needed to reduce housing waiting lists and to allow people to escape from temporary accommodation. Did you know that as a nation, we spend only a tiny proportion of the housing budget on building or improving homes? 88% is spent on housing benefits – lost to the system forever (with proceeds flowing instead to the private sector). In 1975, 96% of the budget was spent on building new homes.



Source: UK Housing Review 2024 (Chartered Institute of Housing). 1975/76 figures: £21.3bn building, £1bn benefits. 2021/22 figures: £3.7bn building, £26.8bn benefits (out of £30.5bn total).

Building social housing brings wide-ranging economic and social benefits: £51bn according to Shelter. (We also need to stop the loss of social housing through Right to Buy).

Appendix B contains links that help you to understand your area better.

HOMES FOR EVERYONE:
THE GREENFIELD LAST APPROACH

Homes for Everyone sets out a comprehensive package of measures that councils can adopt to maximise housing delivery on previously developed land before any greenfield sites are considered. Councillors should press for the adoption of a 'Homes for Everyone Motion' at Full Council Meeting as outlined below. Also see Six Sequential Steps in the appendix.

2.1 Brownfield First

- Demand that the **Brownfield Land Register** [2] is kept regularly updated. Keep a separate list of sites which are suitable for development but do not meet the tight requirements of **The Town and Country Planning Act (2017).** [3]
- Scrutinise the register closely during every Local Plan review, and ask residents and businesses to suggest suitable urban and rural brownfield sites.
- Lobby Government to reverse the 'grey belt' rules: grey belt land is practically never brownfield and the designation is being used to justify greenfield release.
- Lobby government to remove VAT on brownfield developments.

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[2] https://www.gov.uk/guidance/brownfield-land-registers

[3] https://www.legislation.gov.uk/uksi/2017/403/regulation/4/made

2.2 Empty Homes Strategy

- Establish a formal Empty Homes Strategy with measurable targets for bringing properties back into use.
- Include an empty home refurbishment target within the Local Plan.
- Lobby for central government funding for empty home acquisition and renovation, and for the removal of VAT on refurbishment works.

2.3 Disused Commercial Strategy

- Commission a full audit of vacant or underused commercial and public buildings within the local authority area.
- Identify and publicise conversion opportunities.
- Integrate a Commercial & Public Land Register and Action Plan into the Local Plan.

2.4 Gentle Density Presumption

- Adopt a 'density-first' approach in Local Plan policy, reducing urban sprawl and land take while supporting services and public transport viability.

2.5 Tackle Banked Permissions

- Put pressure on the Government to recognise that five-year housing land supply targets are not solely within the gift of local authorities, particularly when developers land-bank, and request that regulations are changed to include permissions that are not built out in the land supply calculations.
- Take legal advice – can you use planning obligations to require commencement of development within one year of planning approval? A condition must be: Relevant to Planning, Necessary, Enforceable, Precise, Reasonable in all other respects.
  We don't know the answer to this question but surely if your council is under pressure to approve planning permissions or allocate unsuitable sites on the basis of a perceived overwhelming need for homes, then it is necessary to require early build out of those permissions already granted? Note that normally a planning permission expires after three years.

2.8 Genuine Affordability

- Lobby Government for adequate funding for social housing.
- Set your own social housing target, independent of national guidance, based on local need.
- Publish the number of people on the housing waiting list prominently and regularly —

this reframes the debate from developer-led 'market housing' to genuine housing need. Lobby for the definition of 'affordable' to be based on a percentage of local income, not market values.

- Check that your local housing register does not contain duplicates on neighbouring local authority lists.

A TOOLKIT TO HELP YOU PREVENT INAPPROPRIATE DEVELOPMENT

Councillors and communities are not powerless. There is a substantial toolkit of planning, procedural and legal mechanisms that can be deployed to slow, add conditions to, or prevent inappropriate greenfield development. Here are some options:

3.1. Do your Local Plan *right*, not fast

The Government is setting housing targets that, in some cases, are impossible to meet without destroying countryside, green spaces and Green Belt. These targets do not reflect need. They are worked backwards to meet a manifesto pledge of 1.5m homes which was not based on evidence (we've asked, via an FOI). In addition, the formula used inflates the targets far beyond the 300,000 homes per annum headline figure, to around 370,000 homes.
The government tells you that meeting these targets is mandatory and that a local plan by certain deadlines is a requirement. But surely it is your duty to push back on unsustainable housing targets? And surely it is better to adopt a local plan slowly that does the right thing, rather than rush one through simply to meet top-down and meaningless targets that do not solve the housing crisis?

- Delay each stage of the Local Plan if brownfield registers are not up to date, an empty homes policy is not in place or if infrastructure plans are not deliverable. Delay adoption if proposed allocations include unjustified greenfield sites.

- Ensure the plan includes strong sequential tests, a brownfield-first policy, infrastructure-first requirements, and a density presumption (minimum 75 dph).

The government cannot possibly take every council into special measures, so work with neighbouring councils to push back on unreasonable timescales. Ask yourself if special measures are any worse than the current situation. It simply means that decisions are taken by the Planning Inspectorate. Is this such a threat? Many decisions are going to appeal anyway.

3.2 Grampian Conditions

A Grampian condition (named after Grampian Regional Council v City of Aberdeen District Council [1984] AC 807) is a planning condition that prevents development commencing, or
a specific stage of development being reached, until a specified external event has occurred. It is a well-established and frequently used tool.

Grampian conditions can be used to require that infrastructure - roads, schools, GP surgeries, water supply, sewage treatment capacity - is in place before any homes are occupied or a specified number of dwellings is reached.

A Grampian condition can be attached to any planning permission and is legally enforceable. Breach of condition can result in enforcement action, including stop notices.

- Importantly, a Grampian condition can in practice act as a long-term brake on development if the infrastructure trigger cannot be met — effectively preventing build-out without the council needing to refuse permission outright (which may be challenged at appeal).

- Officers should be directed to apply Grampian conditions proactively and to draft them tightly, ensuring they are specific, enforceable and linked to measurable triggers.

3.4 Community Infrastructure Levy (CIL)

If you see an infrastructure deficit in your district, borough, county or city, ask whether your Council uses the **Community Infrastructure Levy** [4] as a tool to raise funds. Unlike Section 106, it's non-negotiable for developers. It's used to fund a fixed list of projects that do not have to be related to a particular development.

3.5 Neighbourhood Plans

Support Neighbourhood Plans and reflect their policies in Local Plans and in planning decisions. An adopted Neighbourhood Plan carries significant weight in planning decisions and can provide additional protection beyond the Local Plan.

- Neighbourhood Plans can designate Local Green Space — giving specific sites protection equivalent to Green Belt.

- They can set local design standards, density requirements and infrastructure-first policies that are legally material considerations in planning decisions.

- A Neighbourhood Plan that identifies brownfield sites for development, and explicitly excludes greenfield sites, provides a strong basis for refusing greenfield applications.

[4] https://www.gov.uk/guidance/community-infrastructure-levy

3.6. Judicial Review

Judicial Review (JR) is the legal mechanism by which decisions made by public bodies can be challenged in the courts on the grounds of illegality, irrationality or procedural unfairness.

JR is available where a decision has been made unlawfully: for example, if proper consultation has not taken place, if relevant considerations have not been taken into account, or if the decision-maker has acted outside their legal powers.

Your council can mount a challenge or you could give background support and advice to a resident who decides to take a JR. [5]

Case study 1: Tendring District Council v Planning Inspectorate

Tendring District Council launched a High Court judicial review[6] against a decision made by an independent planning inspector

- **The Dispute:** The council had originally blocked a developer's proposal to build a 175-home scheme on the greenfield outskirts of Clacton. The developer appealed, and a government planning inspector overturned the council's refusal, granting permission.

- **The Council's Challenge:** Tendring District Council took the rare step of filing a judicial review against the Inspectorate, claiming the inspector's legal reasoning was fundamentally flawed.

- **The Outcome:** Government chose not to contest the council's legal arguments. The High Court subsequently quashed the inspector's permission, forcing the entire appeal to be reheard by a completely different inspector.

Case study 2: Lincolnshire & Kesteven councils v Secretary of State

Judicial review into huge solar farm on the cards[7] *27 April 2026*

"A judicial review could be sought into the government's decision to approve proposals for the UK's largest solar farm.

The legal action is being considered by Lincolnshire County Council and North Kesteven District Council after the Department for Energy Security and Net Zero approved Springwell Solar Farm on 8 April, with ministers saying it would help "bring down bills for good".

Developer EDF said it would cover an area the size of 1,700 football pitches – 1,280 hectares – and incorporate a battery storage facility, providing power for 180,000 homes.

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[5] https://www.sussexexpress.co.uk/news/politics/council/high-court-quashes-decision-to-allow-solar-farm-to-be-built-in-west-sussex-village-8545820

[6] https://localgovernmentlawyer.co.uk/housing-law/397-housing-news/36741-district-wins-first-ever-judicial-re-view-challenge-to-decision-of-planning-inspector

[7] https://www.bbc.co.uk/news/articles/c9d4d279w33o

The county council said both authorities objected during the planning process because the proposals "did not properly assess" the impacts on rural communities, the landscape and agricultural land.

"Having carefully reviewed the examining authority's report and secretary of state's decision letter, the councils are concerned that the proper process was not followed and are now seeking to challenge the decision legally," a spokesperson said."

3.7. Greenfield Last Motion (HomesForEveryone.org)

Planning decisions do not take place in a political vacuum and councils can, and should, work together to challenge inappropriate development and to influence the government. This is as much the case for Parish Councils.

Consider putting political pressure by:

- Passing a Greenfield Last Motion at Full Council Meeting — this creates a formal policy position that officers and Members must take into account in all planning decisions and Local Plan work.
- Write jointly with neighbouring councils to the Secretary of State — cross-boundary opposition carries significant political weight.

Case Study 1: Norwich to Tilbury pylons development consent order

Several councils in East Anglia, including three county councils (Essex, Suffolk and Norfolk) have worked closely together, holding regular meetings, to oppose the 180km Norwich to Tilbury pylons project and to lobby for better alternatives (HVDC undergrounding or offshore coordination). They have also coordinated their work during the examination of the Development Consent Order, and have appointed four barristers from the same chambers. [8]

Case Study 2: The Wethersfield Airbase Scrutiny Committee

This provides a good example of organised local scrutiny. Fourteen Parish Councils in the Wethersfield area of north Essex formed a body to interrogate a major government proposal (two prisons on an airbase). Local elected members have been able to hold decision-makers to account over an extended period in a way that isolated individual objections could not.

3.8. CROW Act s.85 – Duty to Further National Landscape (AONB) Purposes

If your council is in a National Landscape, be aware that Section 85 of the Countryside and Rights of Way Act 2000 imposes a statutory duty on all relevant public authorities — including Ministers of the Crown, local councils, statutory undertakers and anyone holding public office - when exercising functions that relate to, or affect, land in a National Landscape (formerly AONB).

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[8] https://cornerstonebarristers.com/examination-opens-into-national-grids-norwich-to-tilbury-dco-project/

As amended by the Levelling-up and Regeneration Act 2023, the duty for English authorities goes further than mere 'having regard': they must now actively seek to further the purpose of conserving and enhancing the natural beauty of the National Landscape. This is a stronger, more proactive obligation than the previous wording, and councillors should invoke it
explicitly whenever a development proposal, infrastructure scheme or planning policy affects land within or adjacent to a National Landscape. The duty applies not only to the planning authority itself but to any statutory body involved in the decision. If an authority fails to demonstrate that it has actively sought to further this purpose — not just noted it — that failure is capable of rendering a decision unlawful and susceptible to judicial review.

Case Study: The National Landscape car park expansion challenge, R (The Dedham Vale Society) v SoS HCLG[9]

This was the first known outcome of the new statutory regime. Richard Buxton Solicitors said, *"Our client, the Dedham Vale Society, alongside interveners the Campaign for National Parks, have won a judicial review challenge against the Secretary of State for Housing, Communities and Local Government over the decision by an inspector to negatively screen a car park expansion at Manningtree Station under the EIA Regulations without applying the revised duty under section 85, Countryside and Rights of Way Act 2000. Following the filing of skeleton arguments the SoS, and the train company interested party, consented to judgment accepting that the failure to apply the duty in making the screening decision constituted an error of law and the outcome might have been different had it been applied. The Government agreed to pay our client's costs."*

3.9. Maldon Appeal – Landscape Harm Outweighs Housing Targets

It is possible for landscape arguments to trump the dreaded housing land supply arguments! The March 2025 appeal decision[10] at Southminster in the Maldon District is a powerful illustration that even a severe housing land supply shortfall does not guarantee planning permission for edge-of-settlement development in sensitive landscapes.

The Council had only 2.7 years of housing land supply against the required five years, and several of the original reasons for refusal had fallen away. The Inspector nonetheless dismissed the appeal, concluding that the proposed development of 220 dwellings on
agricultural land north of the village would cause "very substantial harm" to the character and appearance of the area, seriously eroding the rural setting.

The Inspector found that the adverse impacts would "significantly and demonstrably outweigh the benefits," including the housing and affordable housing gains, when assessed against the Framework as a whole. Critically, landscape harm was assessed independently of the heritage and habitat issues, and it was landscape alone that proved determinative.

Councillors should therefore note that a tilted planning balance in favour of development does not always override the NPPF's own requirement to recognise the intrinsic character and beauty of the countryside.

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[9] https://www.richardbuxton.co.uk/case/national-landscape-car-park-expansion-challenge/
[10] APP/X1545/W/24/3351697

3.10. Grey Belt: Green Belt Designation Still Carries Weight

Do not be tricked by descriptions of 'grey belt' (introduced in the National Planning Policy Framework in December 2024) as disused petrol stations and derelict car parks. Nothing could be further from the truth.

We demonstrated this in our **'Greying the Green Belt'** report [11], and in our more recent Grey Belt Tracker which shows that 14,700 acres of Green Belt farmland and countryside - equivalent to over 11,000 football pitches - is currently at risk of development. You can see our own Grey Belt Tracker map here: **Grey Belt Tracker Map**

(If you want to submit Green Belt at risk that is not shown on the map already, click **here**).

Case studies: Grey Belt appeals dismissed

"Government refuses 750-home grey belt scheme" (17 April 2026)
The government has refused the appeal of a 750-home development on grey belt land citing concerns about "substantial significant harms to the green belt". An outline planning application for a housing estate on Thurrock Airfield was rejected by the Thurrock Council last year due to its impact on the Green Belt. This was following a two-week public enquiry the council held in July last year regarding the site in Orsett that would include up to 750 homes along with shops and a medical centre." [12]

Also[13]:

- APP/B1930/W/24/3338501 - dismissed. (115 homes at Lye Lane, St Albans) the Inspector found that substantial harm to purpose (c) would fundamentally undermine the purposes of the Green Belt, and that the site therefore did not qualify as grey belt.

- APP/Z2315/W/25/3363564 - dismissed. (Battery storage facility, Padiham), the Inspector used 155(a) as a gateway test, whereby failing this test means the development remains inappropriate and no further consideration of the question is necessary.

3.11. The Public Sector Equality Duty

The landmark Court of Appeal judgment, Bracking v Secretary of State for Work and Pensions [2013] EWCA Civ 1345, is essential reading for anyone scrutinising decisions that may affect people with protected characteristics under the Equality Act 2010.

The case confirmed that section 149 of the 2010 Act imposes a heavy, substantive duty — not a box-ticking exercise — on public authorities to have "due regard" to equality objectives when making decisions.

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[11] https://communityplanningalliance.org/wp-content/uploads/2026/01/251024_CPA-Report-GREYING-THE-GREENBELT_Oct25.pdf
[12] https://www.lgcplus.com/services/housing/government-refuses-750-home-grey-belt-scheme-17-04-2026/
[13] https://www.cpre.org.uk/wp-content/uploads/2025/12/CPRE-Grey-Belt-Planning-Appeals-Analysis.pdf

The court identified a number of key principles: the duty must be discharged by the decision-maker personally (not delegated to officials), it must be addressed before and during the decision-making process rather than as a retrospective exercise, it must be exercised "in substance, with rigour, and with an open mind," and there must be a conscious, structured focus on the specific statutory criteria rather than a vague general awareness of equality issues.

For planning purposes, this means that when a development is likely to have disproportionate adverse effects on groups sharing a protected characteristic — whether because of impacts on accessible housing, loss of community facilities, severance of active travel routes, or effects on health — the planning authority is legally required to address those impacts rigorously. A failure to do so is a ground for judicial review.

3.12. Brownfield First: Wolverhampton and the Local Plan Route

Wolverhampton City Council provides a useful model: its Local Plan and brownfield land register work together to direct housing growth to urban sites, supporting regeneration while shielding the rural fringe. Councils that can demonstrate a credible, deliverable brownfield pipeline are in a much stronger position when appealing against greenfield proposals, because they can show that the housing need can be met without harm to the countryside.

Councillors should press their planning officers to keep the brownfield register up to date, to include all genuinely available and deliverable sites, and to ensure Local Plan policies explicitly sequence brownfield delivery ahead of greenfield release. A robust register also makes it harder for developers to argue that there is no alternative to a particular greenfield site — a point that is directly relevant to the EIA alternatives assessment discussed below.

3.13. The Mitigation Hierarchy — Avoid First

The mitigation hierarchy is a sequential framework used in environmental assessment and ecological appraisal, and its importance lies in the fact that its stages must genuinely be worked through in order — they are not a menu of equivalent options. The stages are: Avoid, Minimise, Restore, and Offset (or Compensate).

Critically, mitigation by offset or compensation is only appropriate as a last resort, once it has been demonstrated that impacts cannot be avoided or minimised through an alternative site, layout, or design. In practice, applicants frequently proceed directly to compensation measures — biodiversity net gain calculations, habitat creation, financial contributions — without first demonstrating that the impacts could not have been avoided altogether.

Councillors should challenge this approach whenever it arises. If a developer is proposing to compensate for the destruction of a hedgerow, the loss of a species-rich grassland, or harm to a watercourse, the first question to ask is: could the development have been sited or designed so that the impact did not arise at all? If the answer is yes, then compensation is not the appropriate response.

3.14. Alternatives in the Environmental Impact Assessment

The EIA Regulations 2017 require applicants to include in their Environmental Statement a description of the reasonable alternatives they have studied and the main reasons for the choice made, having regard to the effects on the environment. This is not a cosmetic requirement: a genuine consideration of alternatives — including alternative sites, alternative layouts, alternative access arrangements, and the "do nothing" scenario — is a legal obligation. In practice, alternative chapters are often superficial, dismissing options with minimal analysis.

Councillors should examine the alternatives assessment carefully and ask whether it genuinely explains why less harmful options were ruled out, or whether it has been constructed after the fact to justify a predetermined choice. Where a development could have been directed to a brownfield site, or where a less sensitive part of a site could have accommodated the proposed uses, the failure to give that option proper consideration is a deficiency in the EIA that can form the basis of a robust objection.

3.15. Cumulative Impact of Overdevelopment

The cumulative impact of multiple related or contemporaneous developments is frequently underestimated and inadequately assessed. The cumulative effects arising from a project's interaction with other existing, approved, and reasonably foreseeable projects should be assessed.

Functional interdependence is a key concept here: where separate projects cannot operate independently of one another — for example, where an offshore wind farm, a grid connection cable, a converter station and an interconnector are all part of the same energy pathway — they may in law constitute a single project requiring holistic assessment. Councillors should require that all related and foreseeable projects within the same corridor or zone of influence are included in the cumulative assessment, and should challenge any Environmental Statement that omits contiguous schemes from its assessment on the basis that they are not yet consented.

3.16. The Gunning Principles – ensure consultations are fair

The Gunning Principles, originating in R v Brent LBC ex parte Gunning (1985) and confirmed by the Court of Appeal in R v North and East Devon Health Authority ex parte Coughlan [2001], set out the four conditions that must be met for a public consultation to be lawful.

First, the consultation must take place when proposals are still at a formative stage — not after the decision has effectively been made.

Second, those being consulted must be given sufficient information and reasons to allow them to give an intelligent and meaningful response.

Third, adequate time must be allowed for that response.

Fourth, the product of the consultation must be conscientiously taken into account by the decision-maker.

These are not aspirational standards: breach of any one of them can render the resulting decision unlawful. For councillors, this means scrutinising not just whether a consultation was held, but whether it was genuinely open, whether the documents provided were adequate to enable an informed response, whether the timetable was reasonable, and — crucially — whether the responses were seriously engaged with or simply noted and set aside. A consultation that is launched with a predetermined outcome, or whose responses are summarised in a misleading way, will not satisfy the Gunning test.

3.17 Make Sure Development Proposed or Approved by Your Council Is Sustainable

The word 'sustainable' is bandied about and often meaningless. We have therefore come up with a definition of sustainable development[14] which incorporates rigorous, detailed sustainability tests for local plans and planning decisions, covering carbon emissions, biodiversity, natural capital, flood risk and social equity. Residents are paying the price for poor planning decisions which allow unsustainable development. See our report, "Who's Paying for Unsustainable Development And how are we monitoring those costs?",[15] and our Motion for Sustainable Development that you can put to full Council: **CPA Blog: Call to Action – Unsustainable Development Must Be Acknowledged! And Who Pays? - Community Planning Alliance**[16]

3.18 Overly Dominant Development (e.g Warehouses/Mega Sheds)

Many of you will be aware of proposals to build huge warehouses (over 20m high) which operate 24 x 7 that will cause significant financial, mental and physical health problems for your constituents. We produced this report (**Besieged by B8s**) which sets out how communities are impacted and potential actions that can be taken to address the issues we have raised.

We would urge you to consider the impacts on your communities when such developments are proposed (these can include data centres and other structures as well as mega-warehouses). Councillors should also put pressure on the government to redress the imbalances in the planning system. As an example, if developments such as these are refused, developers have 6 months within which to appeal. If the application is approved, your communities cannot appeal at all, AND they only have 6 weeks to request a judicial review of the scheme.

Councillors should also encourage the government to strengthen planning rules to ensure that developments such as these do not result in additional costs for the public purse due to the significant impact of these schemes on communities.

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14 https://communityplanningalliance.org/wp-content/uploads/2026/01/260113_CPA-Definition-SUSTAINA-BLE-DEVELOPMENT_Jan26.pdf
15 https://communityplanningalliance.org/wp-content/uploads/2026/03/260319_CPA-Re-port-WHO-PAYS-FOR-UNSUSTAINABLE-DEVELOPMENT_Mar26.pdf
16 https://communityplanningalliance.org/blog/call-to-action-unsustainable-development-must-be-acknowl-edged/

YOU ARE NOT ALONE

Many councils are feeling the pressure on their green spaces in the face of imposed housing targets.

Case Study 1: Enfield Council

Enfield has withdrawn from the Government's New Town process, saying, "We have been elected on a clear mandate to protect Enfield's Green Belt, and today we are honouring that commitment by formally withdrawing from the New Town process."

The council's new Leader has written to the Housing Minister, Matthew Pennycook, and confirmed that the Council "will no longer support proposals linked to the programme, including development at Crews Hill, Vicarage Farm and across parts of the borough's Green Belt.

The decision follows May's local elections, which resulted in a change of administration with 31 Conservative councillors, 27 Labour, and five Green members elected.

The new Conservative leadership campaigned on a clear commitment opposing the New Town proposals.

While withdrawing from the New Town programme, the Council has reaffirmed its commitment to addressing the borough's housing shortage and supporting economic growth."

The council will focus instead on brownfield sites and town centre regeneration.

https://www.enfield.gov.uk/news-and-events/2026/enfield-withdraws-from-new-town-process-following-change-in-leadership[17]

Case Study 2: The Cotswolds

The Times has reported that the Liberal Democrat leader of Cotswold district council has written to Matthew Pennycook saying that the targets for 18,650 new homes over the next 18 years are "detached from reality", with the district to receive a more than 100 per cent increase to its annual housing target.

"Evemy said the burden of meeting these "eyewatering housing numbers" fell almost entirely on a small number of historic towns and villages, which "could be overwhelmed by unprecedented levels of new development".

Evemy said residents wanted "affordable homes that meet local needs, not an arbitrary housing number imposed by an algorithm that is designed to be one-size-fits-all, but which completely ignores the unique character and constraints of different areas across the country".

Evemy told The Times, "We aren't alone in having requests for a rethink on housing requirement rejected. Every other council we've engaged on this issue is reporting the same outcome."

Cotswold villages could be lost in Labour housebuilding 'frenzy'[18]

Case Study 3: Royal Borough of Maidenhead & Windsor.

The Maidenhead Advertiser reported that "The council is taking steps to draw up a brand-new Borough Local Plan to fight back against the 'impossible' Government housing target imposed."

It added, Evidence will be collected to try and show that building 1,400 homes is 'more than extremely challenging' – rather it is 'impossible'."

Borough Local Plan process to start again as housing targets pose 'greatest threat' to borough - Maidenhead Advertiser[19]

[17] https://www.enfield.gov.uk/news-and-events/2026/enfield-withdraws-from-new-town-process-follow-ing-change-in-leadership

[18] https://www.thetimes.com/uk/politics/article/domesday-villages-housebuilding-cotswolds-gloucestershire-6zfd2hn6f

[19] https://www.maidenhead-advertiser.co.uk/news/council-and-politics/706449/borough-local-plan-process-to-start-again-as-housing-targets-pose-greatest-threat-to-borough.html

CONCLUSION

There is no planning, economic or social reason why the housing crisis must be solved on greenfield land. Brownfield first, empty homes, gentle density and infrastructure-led development can meet housing needs without destroying the countryside.

Councillors have a substantial toolkit — from Local Plan policy to Grampian conditions, S106 agreements, Neighbourhood Plans, judicial review and democratic action — to put a brake on inappropriate development.

Voters want their politiicans to do more to protect the environment and we owe it to future generations to get this right. Our green spaces are not finite. Our nature is already under pressure. And the solutions are there.

For further information and resources, including our YouTube channel with webinars, visit www.communityplanningalliance.org or https://homesforeveryone.org/ Contact: Rosie Pearson, Co-Founder, communityplanningalliance@mail.com

Appendix A. New Towns Checklist

#	Question	Response
1	Has the taskforce verified deliverability of promoter promises?	□ YES □ NO
2	Does the viability support 40% affordable housing?	□ YES □ NO
3	Does the 'affordable' include 50% social rent?	□ YES □ NO
4	Is it 'transit-oriented development' — public transport and active travel led — and does the viability support a regular, frequent public transport service?	□ YES □ NO
5	Does the proposal have local support?	□ YES □ NO
6	Is the proposal for high density development (e.g. terraces and courtyards) rather than single-dwelling, low density, car-dependent sprawl?	□ YES □ NO
7	Does the proposal allow for at least 40% green space?	□ YES □ NO
8	Does the site have access to a jobs market by foot, bike or public transport, and/or is there a credible job creation proposal?	□ YES □ NO
9	Will infrastructure and services be delivered before homes?	□ YES □ NO
10	Is there evidence of sufficient water for the proposal?	□ YES □ NO
11	What plans are in place to treat the new town's sewage?	□ YES □ NO
12	Does the proposal avoid best farmland, irreplaceable habitats and red list species?	□ YES □ NO
13	Have viability appraisals been published? (New towns invariably fail on viability.)	□ YES □ NO
14	Does the proposal count towards the local housing target?	□ YES □ NO
15	Is the site brownfield, for regeneration?	□ YES □ NO

Appendix B. Understand Your Area

This map allows you to understand the environmental constraints and brownfield opportunities in your area:

Map of planning data for England | Planning Data
https://www.planning.data.gov.uk/map/?q=cm77+8bg&type=postcode&dataset=agricultural-land-classification&dataset=brownfield-land&dataset=brownfield-site#51.867675499577985,0.5804472062134209,12z

Empty Homes has excellent data:
Empty Homes Data — Action on Empty Homes
https://www.actiononemptyhomes.org/facts-and-figures

Blue & green infrastructure map:
Green Infrastructure Map https://designatedsites.naturalengland.org.uk/GreenInfrastructure/map.aspx

DEFRA Magic Map – environmental designations:
MAGIC
https://magic.defra.gov.uk/home.htm

Natural England Land Classification Maps:
Natural England Access to Evidence - Regional Agricultural Land Classification Maps
https://publications.naturalengland.org.uk/category/5954148537204736

Open Infrastructure Map: https://openinframap.org/#2/26/12

Historic Map - side-by-side old with modern day:
Side by side georeferenced maps viewer - Map images - National Library of Scotland
https://maps.nls.uk/geo/explore/side-by-side/#zoom=5.0&lat=56.00000&lon=-4.00000&layers=6&right=ESRIWorld

Housing demand map: https://warwick.ac.uk/fac/soc/economics/news/2025/11/the_housing_crisis_wont_be_solved_until_planners_put_homes_where_people_actually_want_to_live/