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## The House of Lords Built Environment Committee call for evidence on Grey Belt

Input from The Housing Forum

### **Response submitted by:**

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### **About The Housing Forum**

The Housing Forum is the UK's cross-sector, industry-wide organisation that represents the entire housing supply chain. Our growing membership drawn from over 150 organisations across the public and private sectors and includes local authorities, housing associations, housebuilders, architects and manufacturers. All share our determination to drive quality in the design, construction and decarbonisation of UK homes. They have a commitment to partnership working and share in our vision of 'A Quality Home for All'.

In order to achieve this, we have advocate for policy change needed for everyone to live in a good quality, sustainable and affordable home. Our key [Housing Solutions](#) set out how we think this can be achieved.

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**1) What is your assessment of the Government’s definition of “Grey Belt”?**

We welcome the use of the term ‘Grey Belt’ for opening up discussions around where is best to build, including potentially within the green belt. However, the term itself is not well defined and has caused a degree of confusion. “Grey Belt” sites may not be a “belt” – as in a continuous strip of land (depending how it is defined).

**a) What is your understanding of what makes a “limited contribution” to achieving the purposes of the Green Belt?**

We are concerned that the term ‘limited contribution’ has not yet been clearly defined. Further guidance is required in order for councils to assess which sites are making a ‘limited contribution’ to green belt purposes as this will otherwise be a subjective judgement.

Guidance should be contained in both the NPPF, to ensure that it has sufficient weight, and the Planning Practice Guidance, so that it can be explained in sufficient depth with additional guidance included.

It is important that this is provided quickly, as they will otherwise delay local plan-making in authorities which cannot meet their housing targets without releasing green belt land and are not currently clear on whether they are required to do so.

The Government has set out proposed features as criteria for Grey Belt<sup>1</sup> which we are broadly in agreement with. We would add to this list land that is within 1km of a train station as a reason for inclusion, which would help meet the Government’s ambitions for sustainable development.

Many green belts cut across multiple local authority areas. This is an area where a national review of the value of green belt land would be much more efficient and consistent than requiring local authorities each to assess their own land.

**2) Do you think the Government’s Grey Belt proposals will contribute to delivering new homes across the country and, if so, how quickly?**

**a) How many new homes could be built on Grey Belt land?**

**b) Will the creation of a new Grey Belt category be a better way to deliver new homes in the Green Belt than the existing processes for redesignating Green Belt land?**

There is significant potential for the large numbers of new homes to be built on green belt land. The Government’s [Land Use Statistics](#) show that 12.6% of the land area in England is green belt, as compared with only 6.2% being for residential use (including gardens), which provide 25 million homes. Releasing

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<sup>1</sup> These are: a) Not strongly perform against any Green Belt purpose; and

b) Have at least one of the following features:

i. Land containing substantial built development or which is fully enclosed by built form  
ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another  
iii. Land which is dominated by urban land uses, including physical developments  
iv. Land which contributes little to preserving the setting and special character of historic towns

10% of green belt land would therefore be enough land for around 5 million new homes, at current densities, which is enough for the entire of the country's requirement for land for new housing for the next 20 years. And clearly it is not necessary for all the new homes to be built on green belt land.

The potential of 'Grey Belt' sites within this, however, is much harder to measure because it depends how Grey Belt is defined. If Grey Belt is defined narrowly as brownfield sites of little value to nature, recreation or other uses, then the potential is very limited.

In terms of the process of designating Grey Belt land for housing, one option would be for the Government to leave this to local authorities, but to continue to expect councils to consider green belt land if they are otherwise unable to meet their housing targets in full. Another option would be a more top-down approach with clearer guidelines as to which green belt land should remain protected and which should be considered for housing.

**3) Do the current proposals for identifying Grey Belt land provide local planning authorities with sufficient scope to meet their housing targets and the needs of local communities?**

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Grey Belt is not well defined, which means that local authorities may face legal challenges if they attempt to allocate it to meet their five-year land allocations, or alternatively will face speculative applications on green belt land if they do not.

**a) Are there any strategic considerations concerning the designation and development of Grey Belt land that may require an unusual degree of collaboration between neighbouring local authorities and, if so, what are they and how is that collaboration to be achieved?**

See answer to Q2. A strategic approach would be valuable across areas where green belts cut across local authority boundaries, and around London in particular.

**4) Do you think the proposed sequential test for allocating land in the Green Belt for development will provide sufficient protection for "high quality" Green Belt land whilst still ensuring sufficient land is released for new housing? [\[1\]](#)**

We are broadly supportive of the sequential test. However, we think that the previous usage of the land is not always the defining factor in determining the right places to build. The sustainability of the location and benefits of building in that location should be weighed against the loss of ecological or recreational value or other green belt purposes. Some brownfield sites (such as derelict quarries) can provide valuable ecological habitats and may therefore be a less suitable location than land that is currently farmed. The focus on brownfield first is not an absolute.

**a) The current NPPF designates specific categories of land as "areas of particular importance" which cannot be developed and would be excluded from being considered Grey Belt land. Should the Government review which areas receive this designation?**

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The current land use protections protect land across large areas of the country which do not have a green belt. We cannot see any strong rationale for why it would be necessary to have separate or different protections for land that was formally green belt land.

**5) What infrastructure and local amenities are necessary to ensure that a Grey Belt housing development is a good place to live?**

The same infrastructure and local amenities necessary to ensure a Grey Belt site is a good place to live are the same as those needed to ensure any new development is a good place to live. The wider-scale issues should be considered at Local Plan stage, and the site-specific delivery of infrastructure should be considered via the planning determination process.

**a) Should the identification of Grey Belt land be influenced by the proximity of public transport amenities or other services, or is this better handled through individual planning applications?**

Yes, the identification of green belt land to release for housing should be influenced by the proximity of transport amenities and accessibility to existing large-scale infrastructure and services beyond those which would normally be provided as part of a new housing development. This will make new housing more sustainable than if it is built simply on the land that is previously developed, or of least other use, which could be poorly located.

**b) How can identified Grey Belt sites be connected with social infrastructure such as schools and health facilities?**

Green belt sites are – by definition – on the edges of existing settlements so should be well-placed to be connected to existing infrastructure via roads, bus routes, railways and active travel options. Railways would not normally be built as part of a new development, so it makes sense to allocate land that already has a station nearby. Bus routes, roads, walking and cycling routes should be considered via the normal planning process.

**6) The Government has pointed to disused petrol stations and car parks as instances of Grey Belt land. Are any additional special measures needed to support the potential decontamination of Grey Belt land, beyond those that are currently available?**

There is nothing special about brownfield sites within green belts. There is therefore no reason why mechanisms that cover the decontamination on brownfield sites within urban areas and on greenfield sites that are not in a green belt would not be sufficient.

**7) The government has proposed a 50 per cent affordable housing target on Grey Belt sites. Is the current approach to viability assessments and s106 agreements able to deliver this?**

This should be viable in much of the country where the housing market is strong, and these are the very areas where the need for housing is highest and building on green belt sites most likely to be necessary. There is more potential for a high proportion of affordable housing on green belt sites than on many other locations because a) They are often greenfield sites with lower costs to build on than

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challenging brownfield infill sites and b) the land would in most cases not have yet been sold for inflated prices in the anticipation of receiving planning consent.

The 50% target for affordable housing may not be viable in some areas with weaker housing markets. Our recent research on the [Cost of Building a House](#) suggests that in around one in five authorities the cost of building a house may exceed what that house would sell for, meaning there is very little potential to cross-subsidise affordable housing.

**8) In order to facilitate Grey Belt development, what flexibility in the process could be introduced without compromising the Government's overall housebuilding objectives?**

As outlined above, one option would be for the Government to leave this to local authorities, but to continue to expect councils to consider green belt land if they are otherwise unable to meet their housing targets in full. Another option would be a more top-down approach with clearer guidelines as to which green belt land should remain protected and which should be considered for housing. This would be particularly valuable across areas where green belts cut across local authority boundaries, and around London in particular.

We would support the approach of allowing release of green belt land via decision-making as a short-term measure for LPAs that cannot otherwise demonstrate a five-year land supply. In the longer-term decisions should be made on a wider spatial scale, because green belts fulfil their purpose across a wider scale and benefits to nature or recreation, as well as the requirement for housing also operate at wider scales. Poorly performing green belt parcels suitable for development are often small pockets of lands in separated locations. Allowing piecemeal development to occur without strategic coordination will be less sustainable than a larger scale planned approach.

It is important to provide guidance on 'limited contribution' as quickly as possible.

## Conclusion

The Housing Forum welcomes the Government's ambitions to increase housebuilding rates, and to maximise the supply of much-needed affordable housing on green belt sites. We welcome the House of Lords Built Environment Committee taking an interest in this issue too and would be very happy to meet with you or to convene a meeting of our members from across the housing sector and supply chain to discuss the issues.

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