

Briefing Paper 3: Development in the Green Belt and the Grey Belt

- Land suitable for housing development should be identified
- Alternative development options should be assessed systematically
- Release of 'grey belt' sites needs to be carefully managed

Introduction

The Government is proposing that policy on the Green Belt be modified to allow development on 'Grey Belt' sites. There remains some uncertainty about which sites would qualify as 'grey'.

Realistic and desirable policy objectives:

1. To utilize all sites which are appropriate for residential development to respond to undersupply and unmet housing need.
2. Strategic plans to consider the positive and negative impacts of alternative development options before identifying and allocating appropriate sites for development and granting planning consent.
3. That development of any site be led by the local planning authority and should be consistent with planning policy objectives, rather than sites being released for speculative development.
4. That developments provide a range of tenures and house types, with social rented housing given priority where there is unmet need. Sites should not be released solely for 'executive-type homes'.

Delivery in the current context

Green Belt policy has operated as a constraint on the development of new housing and has contributed to undersupply and the current housing crisis. It has led to the concentration of new residential development in existing urban centres. While this has had some positive outcomes, in some contexts this has led to a concentration of development in certain built forms, such as high rise housing, primarily flats rather than houses, with an increase in the proportion of smaller homes and fewer new homes suitable for family occupation. This has the consequence that many new developments do not provide the full range of house types required to meet the range of housing needs.

With the focus of successive governments being on unit numbers, local planning authorities have concentrated on the number of new homes built in their areas, rather than on for whom the homes are being built and who can afford to live in them. If we are to build a wider range of housing types, which

will involve building some homes at lower densities, this means more land is needed, which may not be available within the existing urban footprint.

Looking to the future

Review of Green Belts has to be an integral part of strategic and local plan making. It should not be separated from the whole range of considerations key to making planning policy. Decision making for new housing must be integrated in the full set of spatial goals, including establishing goals for all land uses. Therefore key decisions are needed at strategic and very often regional levels, in the same way that decisions on any new towns or settlements need this wider regional context.

Any assessment of whether individual sites within the Green Belt may be appropriate for residential development should be undertaken within a framework, which also considers the potential of brownfield sites and other undeveloped sites not designated as Green Belt, including Metropolitan Open Land.

In each case, sites should be assessed against a range of economic, environmental and sustainability criteria. It is difficult to understand the logic of applying one set of criteria to Green/Grey Belt sites and a different set of criteria to other sites. Access to affordable public transport, employment opportunities, utilities infrastructure (water, power and sewerage), social infrastructure and open space and leisure facilities apply equally. Environmental factors include the role of sites in contributing to climate change mitigation and nature recovery.

Government guidance needs to be much clearer about how to assess whether or not specific Green Belt sites make a significant contribution to specific Green Belt objectives.

- Any assessment which is subjective rather than objective will just lead to legal disputes.
- Access to open space and leisure facilities and to 'nature' does not require a policy, which in effect places a girdle around an urban area.
- Access to open space, leisure facilities and to 'nature' can be provided within an urban context, through the provision and protection of parks and Metropolitan Open Land and its equivalent. Public access to such facilities is much more important than the mere existence of such facilities, and it should be acknowledged that much Green Belt is actually not accessible to the public. Policy needs to focus much more on access to such facilities. An approach to planning which seeks to bring facilities closer to the existing urban population, rather than limiting them to rural areas with limited population is surely preferable.
- The potential for land to be used for climate change adaptation and nature recovery (which is unrelated to public access value) should also be considered objectively and scientifically, and in the context of delivering Biodiversity Net Gain and flood prevention measures.

There are other critical questions in relation to the most effective use of land

Focusing residential development on existing built-up urban areas can drive out other essential land uses including employment sites, open space, social and leisure facilities.

A focus on higher density and high-rise development also increases land values, construction costs and housing prices and rents and consequently has a negative impact on affordability and on the wider urban economy, generating a less mixed income urban community.

Restriction of development on the urban periphery forces households who cannot afford to live in the urban area to much more peripheral locations, which then involve significant transport costs and time in commuting back to employment opportunities in the urban areas or relocating their workplace to the peripheral location. While there can be a positive outcome in geographical dispersal of employment location, this can also lead to a shortage of labour in key services in the main urban location.

Planning policy which constrains residential and economic growth can have negative impacts on the Government's key objective of supporting economic growth. A more balanced approach requires more active consideration of the potentially positive outcomes from supporting more development on the urban periphery, although this needs to be a carefully managed process.

Lessons from past experience

As Green Belt policy has been in effect for several decades, and there has been no serious consideration of alternative approaches by successive governments, it is difficult to draw lessons from past experience in the UK. There are alternative approaches to the relationship between Town and Country other than the Green Belt such as in the Copenhagen 1947 Finger Plan¹.

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¹ https://observatorio2030.com/sites/default/files/2019-11/BP_98_1947_DK_26_The%20Finger%20Plan.pdf