

## **Response to House of Lords Built Environment Committee Inquiry into the Grey Belt in England from The Highbury Group on Housing Delivery.**

There are positive benefits in developing on land on the edge of existing areas relative to intensification of existing high density urban areas or development of major new settlements in relatively isolated locations:

- a) Land can be acquired for development relatively cheaply, especially when it can be acquired at close to Existing Use Value, which will generally be much lower than land in existing urban locations.
- b) Sites which are at the edge of existing urban areas will generally have good public transport capacity and connectivity to existing employment opportunities and social infrastructure and if not, such capacity could normally be provided at a relatively low costs, in contrast with the cost of providing public transport capacity and social infrastructure to new settlements in relatively isolated locations.
- c) Residential development in such locations would beat lower or medium densities and therefore allow for a range of dwelling types, including houses and lower-rise flats. It should also be possible, given land and infrastructure costs will be relatively low, to provide homes in a range of tenures, including significant proportions of social rented and other sub-marketed housing which will contribute to meeting a much wider range of housing needs, relative to inner urban developments which are generally very high density, high-rise flatted accommodation comprising small units and/or luxury penthouse suites.

We therefore support the assessment of development potential of sites on the edge of urban areas, including sites which may be technically within a designated green belt, but which are not making an effective contribution to Green Belt objectives, but which may be suitable for residential development.

Assessment of site potential must be a two stage process. The first phase is an assessment of whether or not a site should be excluded from development on the grounds that it is integral to the delivery of Green Belt objectives. In our view the term 'grey belt' is unhelpful. Local planning authorities should be required to assess sites within the Green Belt. Sites which meet the categories for protection from development as set out in the NPPF and listed in the Inquiry's call for evidence as a) to g) should continue to be protected. We would argue that sites which are in effective agricultural use should also be protected as should land which provides leisure facilities which are publicly accessible and open space which is also open to the general public. It follows that previously developed land within the Green Belt should normally be considered as appropriate for development. The reference in the draft NPPF to sites which make a 'limited' contribution to the Green Belt however needs a tighter definition, to remove so far as is possible, subjectivity in any assessment. We would suggest that a site should not be protected from development solely on the grounds that it creates a physical separation between existing urban settlements, or because it currently acts as a limit on an existing urban settlement.

The second stage of any process should be the same as applies to the assessment of any site for development. This is not just whether the site is suitable for residential development in terms of its location and neighbouring land uses, but whether a specific site is appropriate for the specific form of residential development proposed. This will include built form and density and type of housing (for example whether primarily family sized homes, smaller homes, student housing or housing for elderly persons or other special needs) within the context of the neighbourhood, transport and social infrastructure applicable. The availability of utilities in terms of power, water and sewerage, or the cost of providing new utilities facilities, will also be critical.

In our view it is best if such assessments are undertaken on a consistent basis and therefore it is important that MHCLG issue detailed guidance on both stages of the assessment process. Such assessments should be carried out as part of each LA's strategic housing land availability assessment (SHLAA) process, and there is a logic in potential sites within the Green Belt which meet the above criteria being incorporated in this process rather than as a separate exercise, which would in some cases be politically contentious. Such an integrated approach also allows a planning authority to undertake a comparative assessment of the costs and benefits of alternative development options. It should be carried out by all planning authorities, preferably on a collaborative basis with neighbouring authorities, and not just in those authorities which have identified a brownfield capacity deficit relative to their assessment of housing requirements. This is because residential capacity should be shared by local planning authorities within a sub-regional housing market area.

Local Plan policies on housing type, density and affordable housing should be applied equally to all sites, irrespective of whether they are defined as 'brownfield', greenfield or 'grey belt'. Similarly, policies on development viability, including application of guidance on land value, should be applied equally. As stated above, the application of such policies should in most cases, allow for a relatively high proportion of affordable homes, relative to sites in inner urban areas, possibly above the norm normally applying within a specific local authority area. The development of any site on the urban periphery should be led by the local planning authority and not by a speculative investor or developer.

Note: The Highbury Group on Housing Delivery comprises an independent group of specialists from the public, private and independent sectors with a membership drawn from housing, planning and related professions; it offers advice and makes representations to Government and other agencies on a variety of subjects, with the aim of maintaining and increasing the output of housing, including high quality affordable housing. The views and recommendations of the Highbury Group as set out in this and other papers are ones reached collectively through debate and reflect the balance of member views. They do not necessarily represent those of all individual members or of their employer organisations. The group's core membership and previous statements and research presentations are on the group's website:

Contact: Duncan Bowie  
Chair, Highbury Group on Housing Delivery

[duncanbowie@yahoo.co.uk](mailto:duncanbowie@yahoo.co.uk)

<https://e-voice.org.uk/highburygroup>