

Future Talent Group: Topical Viewpoint

HBF's Planning Director, Sam Stafford, helps set the scene on building on the green belt and the proposal to set up grey belt sites.

Housing on the 'grey belt'. A new land category

Overview

Over recent years, there has been a lot of discussion on how to build more homes while balancing the needs of the economy, environment and social wellbeing. In relation to this is developing on the green belt, areas of land where development is highly restricted. One side of the debate argues that we should review the rules surrounding the green belt, while the other side is committed to preserving the status quo.

What is the green belt and NPPF?

The green belt is an area of land protected from most forms of development. It aims to prevent urban sprawl by keeping developments to urban areas and the countryside protected. Local Planning Authorities (LPA) are responsible for designating land as green belt areas as well as producing planning policies protecting and enhancing the green belt. Most green belts were designated by planners decades ago to ensure major towns and cities did not 'spread'. The land between the two pencil lines the planners drew was not allocated on the basis of its 'beauty' but as a buffer zone within which development should be constrained. As such, and in contrast to the general perception of green belt, much of it is not 'beautiful' - and conversely much of our areas of beauty are not protected by green belt rules.

[The National Planning Policy Framework \(NPPF\)](#) sets out how land in green belt areas should be used and how planning policies for England should be applied in these areas.

The most recent version of the NPPF states that if LPAs wish to change green belt boundaries to allow for more housing, they must first use up all the available brownfield sites (previously developed land) within urban areas or form an agreement with a neighbouring area. Only if these steps have been completed and a solution cannot be reached then will the LPA be able to consider changing green belt boundaries.

The housing supply challenge

We currently face an acute housing crisis and have been consistently under delivering on housing for decades. One of the main constraints on housing supply is the fact that the planning system is not producing enough developable land in the right places to meet the levels of demand.

Local Authorities in green belt areas have traditionally struggled to meet their housing needs because they are green belt constrained.

If a new Government is to meet housing ambitions, it needs to somehow ensure enough land is coming out of the planning system to facilitate its housing numbers.

Whilst everyone accepts we need to be protecting our beautiful green spaces, Labour has recognised that if it is to deliver on its housing commitments and deliver the homes we need, some non-beautiful areas within the green belt could be part of the solution.

Labour's proposal of introducing grey belt areas

The [Labour Party has suggested a new idea to solve the issue of developing on the green belt](#) by introducing a new category of land to encourage more house building, boost public services, affordable homes and improve green spaces.

The grey belt would be a new category of land within the green belt that is of lower quality but could benefit the local community and be used for development. The idea would be to prioritise developing low-quality and unattractive parts of the green belt, such as disused petrol stations or car parks, over environmentally valuable and nature-rich areas. Currently, the planning system doesn't make a clear distinction between different kinds of land beyond already used brownfield sites. However, the new grey belt land category would be a separate category with a wider definition.

The grey belt land category

The grey belt will include more than just previously developed land (PDL) because there isn't enough to meet housing needs. According to Knight Frank, there are 11,000 PDL sites in the green belt but they can only accommodate a maximum of 200,000 homes¹. Instead of expanding the definition of PDL to include agricultural and forestry buildings, the grey belt would create a new category including land that is neglected or of poor quality, on the outskirts of towns.

The challenge will be to define this new category clearly for planning purposes and how it differs from PDL. The definition of grey belt land may include:

- Land that is or has been occupied by a permanent structure that is not captured by the current definition of PDL (e.g. agricultural and forestry buildings);
- Land on the edge of urban areas that is or has been used for recreation (e.g. unused golf courses), but excluding playing fields;
- Land that has been significantly impacted by the urbanisation of development, transport infrastructure or non-agricultural human activity (e.g. pony paddocks or areas near roads or railways).

Defining the grey belt category should also aim to prevent landowners from letting their land become ugly only for it to be classified as grey belt, as was a previous concern to Labour's proposal.

¹ <https://www.knightfrank.com/research/article/2024-01-26-how-can-britains-grey-belt-boost-housing-numbers>

Next Steps

If Labour's idea becomes policy, it could require local authorities to review green belt boundaries when making new local plans to meet housing needs. Then a green belt assessment would need to be completed, which could help to identify the most appropriate sites for a development, whether that be PDL, grey belt or other types of land. The next NPPF could also offer the same support of developing grey belt sites, as the existing one does for PDL.

There are still practical issues to address such as the biodiversity value of grey belt sites and how affordable housing targets will be addressed. However, the most important element of Labour's proposal was the recognition that some green belt areas must be released for housing supply to move forward.

The debate over how to build more homes and protect the green belt is ongoing. Labour's proposal to introduce grey belt sites could help find a middle ground and allow for much-needed housing developments while still protecting valuable green spaces.