

By online portal

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Dear Committee Members

Response to The House of Lords Built Environment Committee inquiry into the Grey Belt.

Cambridge Past, Present & Future is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxton Watermill.

1. What is your assessment of the Government's definition of "Grey Belt"?

Identifying Grey Belt is a place-based approach looking at specific land uses and not their relationships to other land uses. We are concerned that this will lead to conflict with the purposes of Green Belt which has been identified on a system-based approach looking at relationships between land uses.

We consider that the definition is too vague and likely lead to hours of arguments and a large number of planning appeals as to what is and isn't Grey Belt. This will slow down the planning process and divert scarce resources away from planning and into the pockets of the legal profession.

We are concerned about interpretation. How far would the five green belt purposes be adhered to in determining, for instance, an acceptable degree of separation? Site promoters, local authority and local residents may all have a different opinion as to how much a single field or 'green wedge' (as is often found between cities and surrounding villages) contributes to the purposes of the Green Belt.

Agricultural buildings are currently excluded from the definition of previously developed land. However, changes to permitted development rights and prior approvals have made changes of use of agricultural buildings easier. This therefore brings isolated farm buildings into the definition of Grey Belt making it harder for councils to resist development in unsustainable locations.

The definition should strengthen the requirement that Grey Belt land should only be released if in a sustainable location close to a range of services and does not lead to scattered rural development.

We are significantly concerned that introducing a Grey Belt policy will result in gaming of the system or unintended consequences. This is illustrated by two examples from Cambridge:

I) Farming landowners will build agricultural buildings and then change their use via prior approval, after which they then become eligible for Grey Belt. We have seen the new prior approval system being gamed in this way to get planning permission in the Cambridge greenbelt.

II) Some transport infrastructure is permitted in the greenbelt where it does not harm the openness. An example of this are Park & Ride car parks (Cambridge has 3 of these in the greenbelt). In future these could be considered for Grey Belt development. This was not what was intended when these were granted permission – and had it been they would likely have been refused permission.

One of the unintended consequences is that there may be greater opposition to developments which could in future be deemed Grey Belt and lead to future housing development.

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

It is unclear as to whether ‘limited contribution’ has to relate to all five purposes or whether it could just relate to one purpose. The five purposes have different importance in different locations. This can be seen in Green Belt Assessments where land parcels are scored against the five purposes.

If there was a nationally agreed methodology for Green Belt Assessments, where the degree to which each parcel contributes to each Green Belt purpose (ranging from Significant to Limited/None) which are then combined to an overall Harm Rating (ranging from Very High to Low) then this could be the basis for identifying sites with limited contribution.

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

Based on our experience in Cambridge, no. We have pro-growth local planning authorities who have set ambitious housing targets well above any standards. They have also granted planning permissions for a significant amount of housing, including three new settlements and two large urban extensions are also in progress. If greenbelt around Cambridge was released due to being Grey Belt it would just ‘steal’ the housing from developments that are already being planned. There would be no net increase in housing but lots more half-built housing developments, which is not in the best interests of Cambridge or the residents living on building sites that are being built out too slowly.

Additionally, it will take time for local authorities to assess their greenbelt and identify sites with limited contribution. Our view is that this should be done as part of a local plan, which enables a wide range of input and discussion, including from local communities.

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

This depends on the definition. There have already been reports produced with widely varying figures for exactly that reason. Our view would be that the number that could be built on the type of land used as examples by the government (and which local communities would find acceptable) is relatively small.

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?

No.

Decisions on the best locations for new homes are complex and take into consideration a wide range of factors including access to sustainable transport, access to services, access to employment, natural constraints such as landscape, ecology, heritage and flooding. And so on. Greenbelt is just one factor.

For the purposes of the best location for a development in the greenbelt it may be that other locations are preferable to a ‘Grey Belt’ location. The government’s proposals risk driving development to Grey Belt sites which may not be as suitable as other green belt locations. Imagine the scenario where there are two site proposers in the greenbelt, one is in Grey Belt and one isn’t – and only one site is needed. The government’s

proposals would make it hard to choose the one that is in the greenbelt over the one in the Grey Belt, even if that's not the best outcome for other reasons.

A Plan Led approach allows for the allocation of the most sustainable sites to be identified. It will take into account access to services, facilities and infrastructure, and protection of the environment and landscape.

We would encourage you to take a look at Cambridge as an example, which nearly always releases land from the greenbelt at each local plan, but does so as part of a well-considered development strategy. If the 'Grey Belt' policy is introduced, it is possible that planning the best locations for housing in Cambridge will be made more difficult.

Not all Grey Belt land will be acceptable in principle. Some sites can be of great ecological importance or may offer a rare chance to create new greenspace where there is a deficiency of greenspace. Some sites may be badly contaminated, remote and expensive to service.

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?

We think this is unlikely. The proportion of sustainably located Grey Belt land is likely to be small and Local Authorities will have to look to land beyond the Green Belt to meet their housing needs.

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?

A Greenbelt which is located across more than one local authority needs to be assessed with the same methodology by each local authority.

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?

We do not consider that the sequential test adequately protects high quality Green Belt land. Land identified in Green Belt Assessments where the harm of development would be very high should be protected.

Furthermore, Local Nature Recovery Strategies are an important means to identify those areas of the Green Belt to be protected from development.

If Grey Belt policy is introduced, to counterbalance the loss of greenbelt we would like to see protections for high quality greenbelt strengthened. This could be enormously helpful in locations such as Cambridge where every local plan sees a battle by communities (and often the LPA) to defend the best bits from those promoting development on it. The 'hope value' significantly increases land values and dis-incentivises landowners from doing the things that the community would like to see in the greenbelt (e.g. more nature and public access).

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?

This designation should be reviewed to include Local Wildlife Sites, parks, nature reserves, nature recovery areas, and locally listed heritage assets.

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

A good place to live is where daily needs can be reached in the neighbourhood (ideally on foot or cycle) – jobs, school, shops, services, greenspace, etc.

Our concern is that small developments are usually unable to provide these amenities or infrastructure, and it is likely that many Grey Belt sites will be small.

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?

It is good planning practice for development sites to be in a sustainable location which can access services and facilities by public transport or active travel. A Plan-Led approach will direct development to the most sustainable sites.

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

Through a Plan-Led approach which has delivering sustainable development at its core.

We are very concerned that further damage could be inflicted on the greenbelt by the need to build transport infrastructure across the greenbelt to connect Grey Belt developments to services, employment, etc. Especially because transport infrastructure can be permitted in the greenbelt if there is not an alternative. Cambridge can be used as an example of this, the construction of new development has resulted in the need for damaging transport infrastructure across high quality greenbelt.

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?

No response

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?

No response

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

The Government's housebuilding objective must not only be about numbers but about building the right houses in the right location. Grey Belt land should only be released if in a sustainable location with access to employment and a range of services and does not lead to scattered rural development.

Other comments

Biodiversity Gain Golden Thread. There is a 10% margin of error on habitat creation. 10% Biodiversity Net Gain (BNG) was introduced in order to avoid overall loss of BNG. Therefore, to achieve genuine and meaningful BNG you need to be targeting 20%+. We are arguing for 20% in the next Cambridge local plan and our councils want to get that as well. Our view is that BNG in the greenbelt should be 20% as a minimum in order to achieve meaningful change/public benefit.

Low benefit farmland. Much arable farmland in the greenbelt (and countryside generally) is currently of low ecological value and has no public access (and may not be that attractive either). That is very often a product of the current farming regime, influenced by farm subsidies and the market. It wasn't that way in the past and it need not be that way in the future. A point in time should not be used as a justification for a permanent change of land use.

I trust that you will take our comments into consideration.

Yours sincerely

Sarah Nicholas

Principal Planning Officer