



From the Construction Industry Council, The Building Centre, 26 Store St,  
Bloomsbury, London WC1E 7BT

14/October 2024

**Construction Industry Council Submission to The House of Lords Built Environment Committee inquiry into the proposed grey belt**

The Construction Industry Council welcomes the opportunity to provide evidence to the Lords Built Environment Committee inquiry into the proposed grey belt.

**The Construction Council (CIC)**

The Construction Industry Council (CIC) is the representative forum for professional bodies, research organisations and specialist business associations in the construction industry. Our members collectively support and represent circa 500,000 individual professionals and 25,000 firms of construction consultants. An appendix to this letter provides more information about us.

Our members play a vital role in regenerating towns and cities, delivering vital new skills and working in partnership with local authorities, businesses and housing providers to build and refurbish new homes, schools, offices, hospitals and factories. In the past seven years we have been involved with a number of programmes to improve the quality of new homes and raise standards widely.

Our perspective in responding to this inquiry comes from a view of what works best to provide much-needed housing that is well designed, well-constructed and safe, while building strong communities through excellence in place making.

Any change to the planning system is of critical importance to CIC and we are keen to input into this important consultation in the hope of providing constructive and informed comments, drawn from the wide expertise of our membership.

We are not submitting a line by line response to the different questions posed by the Committee, but are raising our general concerns about the proposals to develop on so-called grey belt.

Some of our members will be submitting their own more detailed responses separately.

### **General comments**

Many of our members have taken the view that a review of green belt policy is long overdue in the context of needing to ramp up housebuilding, and that some of this land should no longer be viewed as sacrosanct. CIC believes that we need to increase the number of new homes built to a high quality, including much needed affordable housing, and we welcome the new Government's ambition to do that and to act with urgency.

To that end we are supportive of many of the proposed amends to the National Planning Policy Framework and other measures that could bring about a boost to housebuilding, including the setting up of a New Towns Task Force to identify locations for New Towns, for example.

However, the piecemeal approach being proposed by Government, coupled with such an ill-defined concept as 'grey belt', is not the best way to approach the issue of development on green belt land.

We appreciate that the idea of 'grey belt' suggests a middle ground between preserving large swathes of green belt and building more homes, especially in areas where land might be underused or not environmentally significant, or developed previously.

However, unless this land is carefully defined and considered in the context of what the green belt has been created to preserve, it could result in communities being sited in inappropriate places, and lacking the necessary infrastructure to make them sustainable – in other words, poorly planned urban sprawl.

### **Comments in detail**

### *The need for a strategic approach to green belt land released for development*

We agree with the proposals in the National Planning Policy Framework (NPPF) consultation that local planning authorities should be required to review their green belt land when they cannot meet their housing need.

We acknowledge that the NPPF proposals stipulate that local planning authorities should take a sequential approach to the release of this previously developed or 'grey belt' land, so that it would not be at the expense of under-utilising brownfield land.

We suggest that a release of green belt/ grey belt land is undertaken in a more strategic way, with discussions across local planning authority boundaries. This exercise could be carried out by mayors in their new strategic planning role.

The starting point should be revisiting the purpose of green belts. This is currently defined in law as serving five purposes, primarily for the containment of settlements:

- (a) to check the unrestricted sprawl of large built-up areas;*
- (b) to prevent neighbouring towns merging into one another;*
- (c) to assist in safeguarding the countryside from encroachment;*
- (d) to preserve the setting and special character of historic towns; and*
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Our view is that any green belt changes must take place in the context of managing settlement strategies and not on a case-by-case release. Land should only be released for development if it does not contribute to green belt purposes.

We urge government to set housing targets at a more strategic (i.e. combined authority or county) level, according to local constraints and opportunities, with green belt reviews being run alongside this.

We also think that this would avoid the situation where developers obtain greenbelt land in the hope that if they neglect it, it would become 'grey belt' in time and would then be released for development.

### *Choosing sustainable locations*

The new NPPF should do more to ensure that those sites that are deemed 'grey belt' and can be released without undermining the purpose of the green belt should be sited in sustainable locations. That means having access to all the necessary infrastructure.

### *Affordable housing*

The Government proposes to introduce a series of 'golden rules' to 'ensure that major development on land released from the green belt benefits both communities and nature'. This includes a rule that housing schemes on land released from the green belt should provide 'at least 50% affordable housing, with an appropriate proportion being social rent, subject to viability'.

We agree that in principle this is a good ambition. But across large swathes of green belt land, a 50% target will not be viable, and will open up the process to costly and time consuming viability negotiations. The state of the land, and the price that developers or councils will have to pay for it, means that schemes will not be viable unless greater levels of grant for affordable/ social housing are offered, or there is greater flexibility in the requisite percentage of low cost housing. Developers may also need to invest heavily on infrastructure.

We would suggest continuing to set affordable housing requirements via local plans but with this buttressed by strong national policy backing for maximising delivery, and/or potentially for a national percentage uplift in the number of affordable homes required, couple with raised grant levels.

In terms of land valuation, one of our members suggests an approach to determining the benchmark land value based on the local conditions in which grey belt/green belt is located through the plan making stage. Our member believes this could help to ensure the correct balance is struck between returns to landowners and the delivery of public benefits so that land comes forward without having to resort to CPO measures.

We would be happy to expand on any of the above points.

Contact details:

On behalf of Professor Tony Crook, Chair of the CIC Housing and Planning Panel

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## **Annex A**

### **About the Construction Industry Council**

The Construction Industry Council (CIC) is the representative forum for the professional bodies, research organisations and specialist business associations in the construction industry.

Established in 1988 with five founder members, CIC now occupies a key role within the UK construction industry providing a single voice for professionals in all sectors of the built environment through its collective membership of circa 500,000 individual professionals and 25,000 firms of construction consultants.

The breadth and depth of its membership means that CIC is the only single body able to speak with authority on the diverse issues connected with construction without being constrained by the self-interest of any particular sector of the industry.

Organisations and Professional Bodies in membership of CIC are shown below.

### **Members of the Construction Industry Council**

<u>ACAI</u>	Association of Consultant Approved Inspectors
<u>ACE</u>	Association for Consultancy and Engineering
<u>APM</u>	Association for Project Management
<u>APS</u>	Association for Project Safety
<u>ASFP</u>	Association for Specialist Fire Protection
<u>BAFE</u>	British Approvals for Fire Equipment
<u>BCS</u>	Chartered Institute for IT
<u>BIID</u>	British Institute of Interior Design
<u>BRE</u>	Building Research Establishment
<u>BSRIA</u>	Building Services Research and Information Association
<u>CABE</u>	Chartered Association of Building Engineers
<u>CIAT</u>	Chartered Institute of Architectural Technologists

<u>CIBSE</u>	Chartered Institution of Building Services Engineers
<u>CIOB</u>	Chartered Institute of Building
<u>CIHT</u>	Chartered Institution of Highways & Transportation
<u>CIPHE</u>	Chartered Institute of Plumbing and Heating Engineering
<u>CIPS</u>	Chartered Institute of Procurement & Supply
<u>CIRIA</u>	Construction Industry Research and Information Association
<u>GF</u>	Ground Forum
<u>ICES</u>	Chartered Institution of Civil Engineering Surveyors
<u>ICWCI</u>	Institute of Clerks of Works and Construction Inspectorate
<u>IET-BES</u>	Institution of Engineering and Technology - Built Environment
Sector	
<u>IFE</u>	Institution of Fire Engineers
<u>IIRSM</u>	International Institute of Risk and Safety Management
<u>ISSE</u>	Institute of Specialist Surveyors and Engineers
<u>IStructE</u>	Institution of Structural Engineers
<u>IWFM</u>	Institute of Workplace and Facilities Management
<u>LABC</u>	Local Authorities Building Control
<u>LI</u>	Landscape Institute
<u>NHBC</u>	National House-Building Council
<u>RIBA</u>	Royal Institute of British Architects
<u>RICS</u>	Royal Institution of Chartered Surveyors
<u>RTPI</u>	Royal Town Planning Institute