

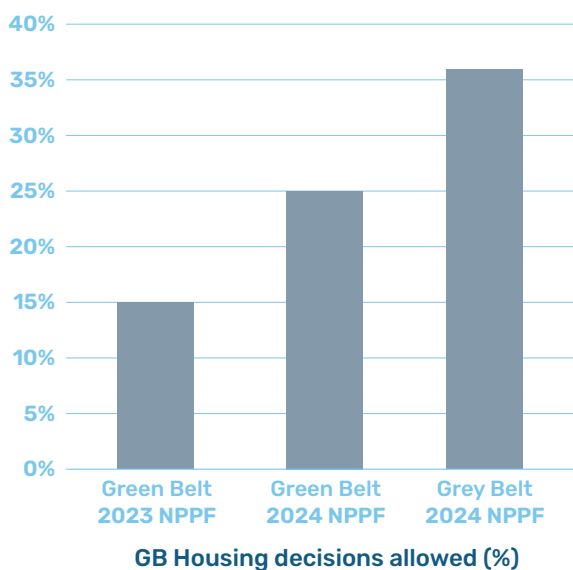
# Grey Belt Impact Assessment

## Introduction

This initial summary report considers the early impacts of grey belt policy on decision-taking and plan-making. As a result of the introduction of grey belt, there have been more allowed appeal decisions in the Green Belt and Green Belt Reviews are expected to identify many more “acceptable” sites for potential Green Belt release when preparing new Local Plans.

## Grey belt impact on Decision-Taking

The chart below compares level of allowed appeal decisions for housing sites in the Green Belt following the publication of the 2023 NPPF and the 2024 NPPF, including a separate bar for those on grey belt.



Since the publication of the revised National Planning Policy Framework on 12th December 2024 (to 3rd March 2025) there have been a total of 70 Green Belt appeals decisions and 49% of these have been allowed. The same rate of success applies to those 30 decisions which reference “grey belt”.

In terms of appeal decisions for housing in the Green Belt, the majority have been for non-major schemes (less than 10 dwellings) whereas some larger housing schemes have been consented at planning committees.

For comparison, following the 2023 NPPF, for the same time period (19th December 2023 to 10th March 2024) 31% of 84 Green Belt appeal decisions were allowed.

***“The introduction of the grey belt has increased the number of allowed planning appeals for development in the Green Belt”***

The grey belt appeal decisions show that the assessment of whether a site utilises grey belt land remains subjective. We expect this to remain the case, even following the Government’s update to National Planning Policy Guidance on 27th February 2025. It is positive that this guidance seeks to make the assessment process more objective, by introducing a more standardised method, however, in practice, each site will continue to be determined on a case-by-case basis. This inconsistency in decision-taking is demonstrated by the recent decision at Beaconsfield in Buckinghamshire Council (ref: APP/N0410/W/24/3347882). In conclusion, at this early stage of grey belt policy implementation, there are some risks attached to its interpretation and weight in the balance.

Note that for the purposes of our analysis housing schemes include private, affordable, self-build dwellings and exclude caravans, gypsy & traveller sites and replacement dwellings.

## Grey Belt impact on Plan-Making

The grey belt definition (Annex 2 of the NPPF) has altered the bar for what might be considered an “acceptable” site for release from the Green Belt from those that make a low or no contribution to those which do “not strongly” contribute to purposes A, B and D.

The table below shows the overall performance of Green Belt sites and parcels against the Green Belt purposes from three separate Council Green Belt Reviews done prior to the introduction of grey belt.

Overall Contribution	Council Green Belt Review			
	SADC <sup>1</sup>	SCC <sup>2</sup>	BCPCDC <sup>3</sup>	Average %
Strong	113	89	70	42%
Moderate	35	152	100	44%
Low or No	34	33	28	15%
<b>Total</b>	<b>182</b>	<b>274</b>	<b>198</b>	<b>n/a</b>

Our analysis shows that on average 15% of sites make a low or no contribution, and the remainder of sites are relatively evenly split between a strong and moderate contribution.

Under the new NPPF, grey belt sites are those that exhibit a moderate or low or no contribution. In practice, this means that the number of “acceptable” sites could jump from around 15% to closer 60% of sites assessed in a Green Belt Review.

“Acceptable” Sites	Council Green Belt Review			
	SADC <sup>1</sup>	SCC <sup>2</sup>	BCPCDC <sup>3</sup>	Average %
Pre Grey Belt	34	33	28	15%
Grey Belt	69	185	128	60%

***“More than half of sites assessed in Council Green Belt Reviews could utilise grey belt land, meaning that on average “acceptable” sites could treble”***

The overall performance scores above are based on an assessment of all five purposes (because the Council Green Belt Reviews were undertaken pre-grey belt). This includes purpose C which relates to safeguarding the countryside. Notably this purpose is generally the highest performer in Green Belt Reviews and it is discounted from the grey belt definition. This means that, in practice, the impact of grey belt could be even greater than suggested in our analysis.

Finally, in accordance with the updated NPPG, it is important to note that grey belt land will not automatically be allocated for development in new Local Plans.

Source Green Belt Reviews:

1. St Albans City & District – Green Belt Review, Stage 2 (2023) by ARUP.
2. Sheffield City Council – Green Belt Review Update (2024).
3. Bournemouth, Christchurch and Pool Council and Dorset Council – Strategic Green Belt Assessment, Stage 2 Harm Assessment, Final Report (2020) by LUC.

## Next Steps

In partnership with the LPDF, Marrons are now undertaking further research around key considerations such as reasons for refusal, performance against each purpose, achieving the golden rules and impact on “*very special circumstances*” to provide more insight into this significant new policy which is having a great impact on planning and delivery of new homes and other development and infrastructure. We also continue to track grey belt appeal decisions.

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