

# Grey Belt

## A Game Changer for Planning and Housing

*Evidence and lessons from the first year to date of policy implementation*

September 2025





# Executive Summary

This report has been prepared by Marrons on behalf of the Land, Planning and Development Federation ('LPDF') to provide a summary of the impact of grey belt planning policy. In doing so, it also provides useful pointers to anyone working on grey belt projects to help them navigate the grey belt assessment.

Grey belt was formally introduced in the revised National Planning Policy Framework ('NPPF') on Thursday 12 December 2024 and it has been nothing short of a game changer.

Following an introduction (in Section 1), this report provides a statistical analysis of all grey belt planning appeals (in Section 2) and discusses major residential grey belt planning appeals (in Section 3). Section 4 provides concluding comments, predictions and observations for the future.

Looking at planning appeals concerning grey belt, the impact is clear.

2025 is the first year in which the percentage of allowed planning appeals is greater than dismissed planning appeals (for inquiries and hearings only).

Overall, 57% (74 of 129) of grey belt planning appeals have been allowed. For residential schemes only, this figure is 55% (34 of 62) and for major residential schemes this figure is 80% (16 of 20).

The introduction of grey belt has been a game changer and has created a new window of opportunity for development. This is illustrated by the data published by the LPDF, which shows a more than 160% increase in the number of planning applications that members (of the LPDF) submitted between January and June 2025 compared to the number submitted between July and December 2024. This increase is reflected in our workload and in conversations with clients.

In conclusion, the main impact of grey belt policy is twofold.

Firstly, it is helping to simplify and speed up the planning system whilst creating more certainty for all parties. These are long-standing, and cross party objectives for the planning system. It is important to caveat that its impact relates to one source of land supply only (the Green Belt) and that other sources, as widely publicised, have experienced difficulties in recent times.

Secondly, it is contributing towards addressing the national housing crisis by increasing supply (particularly in the most constrained areas) and helping to address affordability issues, whilst seeking to achieve sustainable development priorities relating to the environment, society and economy via the Golden Rules requirements.

For the future, the success of grey belt policy must be built upon to further improve the planning system and help deliver the type of development that the country needs.

Finally, any refinements to improve the approach to assessing grey belt land could be made via the National Planning Practice Guidance (NPPG).

***In 2025, more Green Belt appeals (that go to hearings or inquiries) have been allowed than dismissed - a clear sign of change.***

## 01 Introduction

This report has been prepared by Marrons on behalf of the Land, Planning and Development Federation ('LPDF') to provide a summary of the impact of grey belt policy. In doing so, it also provides useful pointers to anyone working on grey belt projects to help them navigate the grey belt assessment.

It focuses on grey belt planning appeals only, to explain the impact of grey belt policy. In summary, the introduction of grey belt policy has been a game changer and has created a window of opportunity for new development in the Green Belt.

Our analysis and observations on grey belt are informed by our experience working on a range of planning applications and land promotions in the Green Belt on grey belt land across the country, in particular our undertaking of grey belt site-specific assessments in accordance with the NPPF.

Our research has been undertaken as a desk-based study and considers planning appeals following the publication of the revised National Planning Policy Framework ('NPPF'). The appeals set out in this report are published from Thursday 12 December 2024 to 31 August 2025 and relate to grey belt only.

Following an introduction (in Section 1), this report provides a statistical analysis of all grey belt planning appeals (in Section 2) and discusses major residential grey belt planning appeals (in Section 3). Section 4 provides concluding comments, predictions and observations for the future.

***Grey belt is proving to be a game changer in how Green Belt land is planned and delivered.***





# 02 Impact of Grey Belt Policy

This section provides a statistical analysis of all grey belt planning appeals.

It highlights the positive impact that grey belt policy has had on decision-making as allowed planning appeals concerning Green Belt development are at a historic high.

The introduction of grey belt policy has had an immediate impact, with 129 grey belt planning appeals having been issued since the publication of the revised NPPF.

## Grey belt is a game changer

### Total grey belt planning appeals

Overall, there have been 129 planning appeals (post-NPPF 2024) which reference grey belt, with 57% of these being allowed.

### Residential grey belt planning appeals

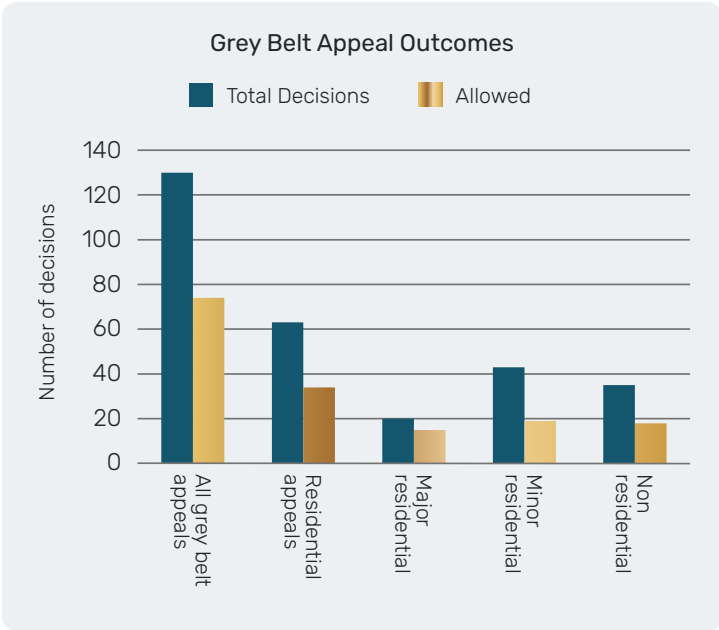
55% of all residential grey belt planning appeals have been allowed. Within this total there have been 20 major residential grey belt planning appeals (for 10+ dwellings) and 80% of these have been allowed.

Of the remaining 43 minor residential grey belt planning appeals, 45% have been allowed.

Note that the residential decisions considered exclude caravan sites and traveller sites.

The average size of a residential grey belt planning appeal is approximately 30 dwellings, and most common size is one dwelling. This illustrates that most of the housing proposals at appeal to date are relatively small.

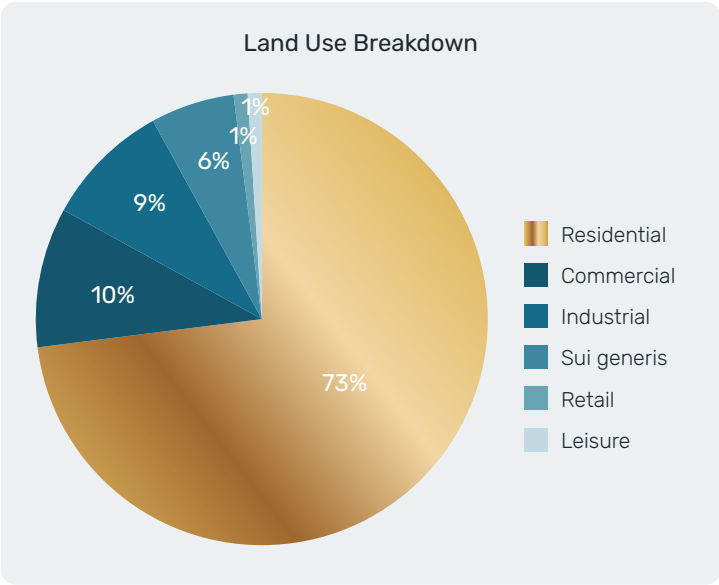
For major residential grey belt appeals, the average size is more than 100 dwellings and total is 1,620 dwellings.



### Land use breakdown

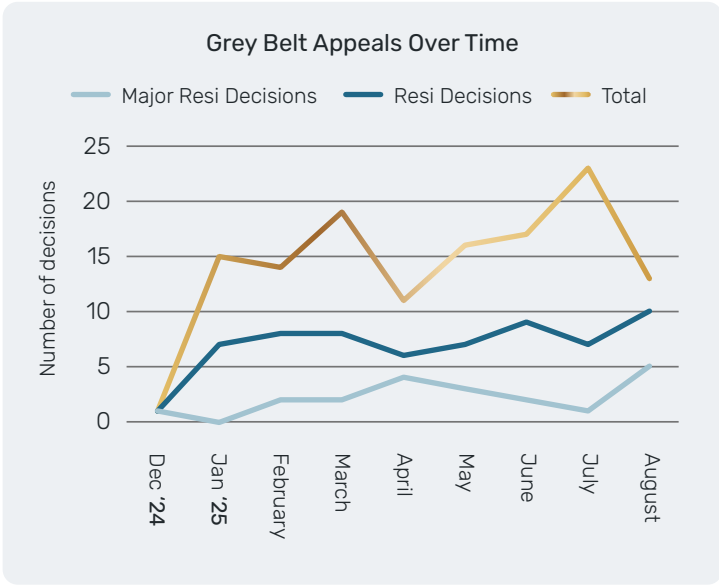
Residential schemes represent 73% of all grey belt appeals. The remaining appeals are mainly for Commercial (10%), Industrial (9%), Sui generis (6%), Retail (1%) and Leisure (1%).

53% of non-residential grey belt planning appeals have been allowed.



### Number of grey belt planning appeals over time

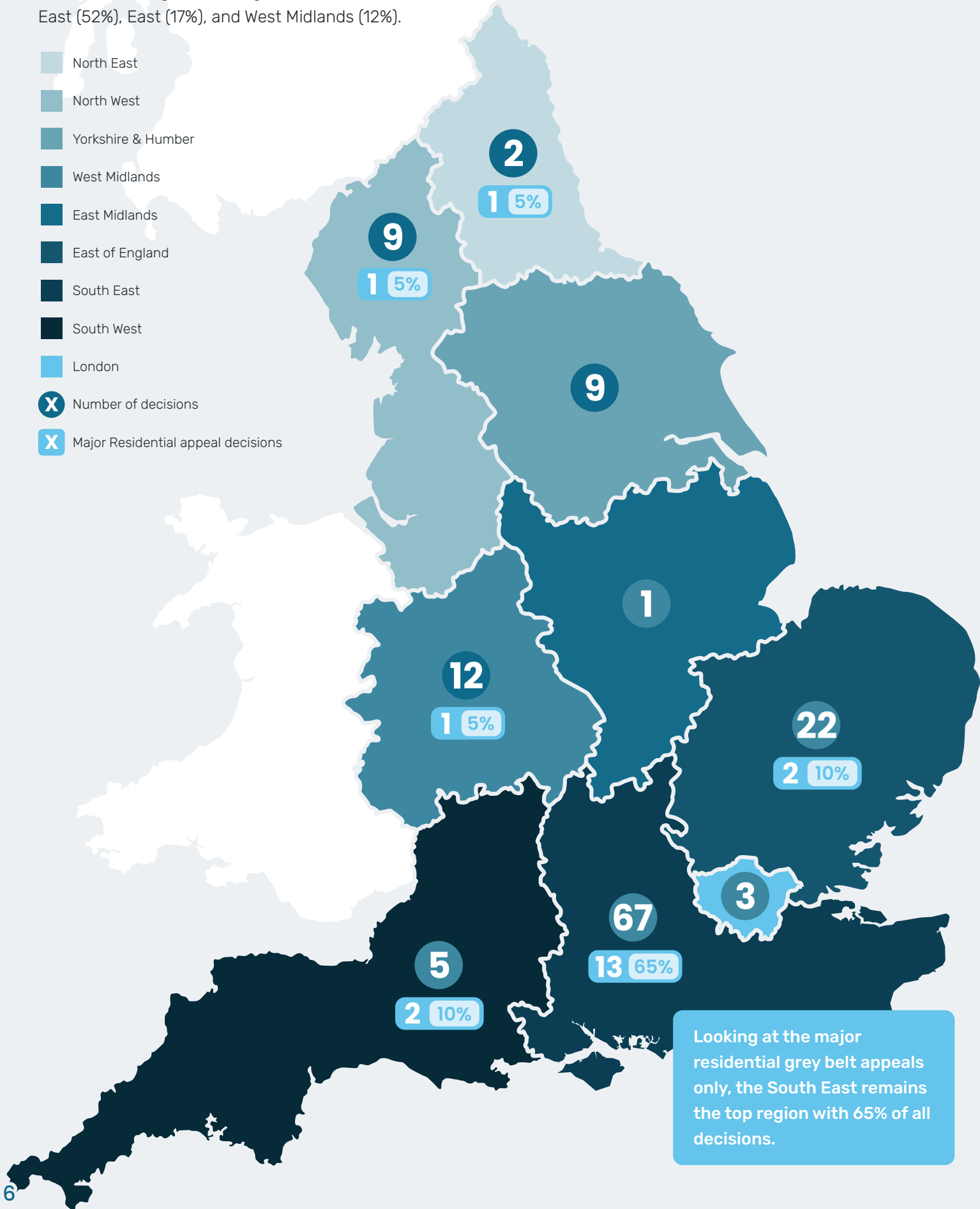
The number of grey belt decisions has increased over time. July was a bumper month overall and the greatest number of major residential grey belt appeals have been issued in August.



Location of grey belt planning appeals

The top three regions for all grey belt appeals are the South East (52%), East (17%), and West Midlands (12%).

- North East
- North West
- Yorkshire & Humber
- West Midlands
- East Midlands
- East of England
- South East
- South West
- London
- X Number of decisions
- X Major Residential appeal decisions



Looking at the major residential grey belt appeals only, the South East remains the top region with 65% of all decisions.

Decision type for grey belt planning appeals

Most grey belt planning appeals have been decided by written representations. However, the majority of the major residential grey belt appeals have been decided at hearing or inquiry.

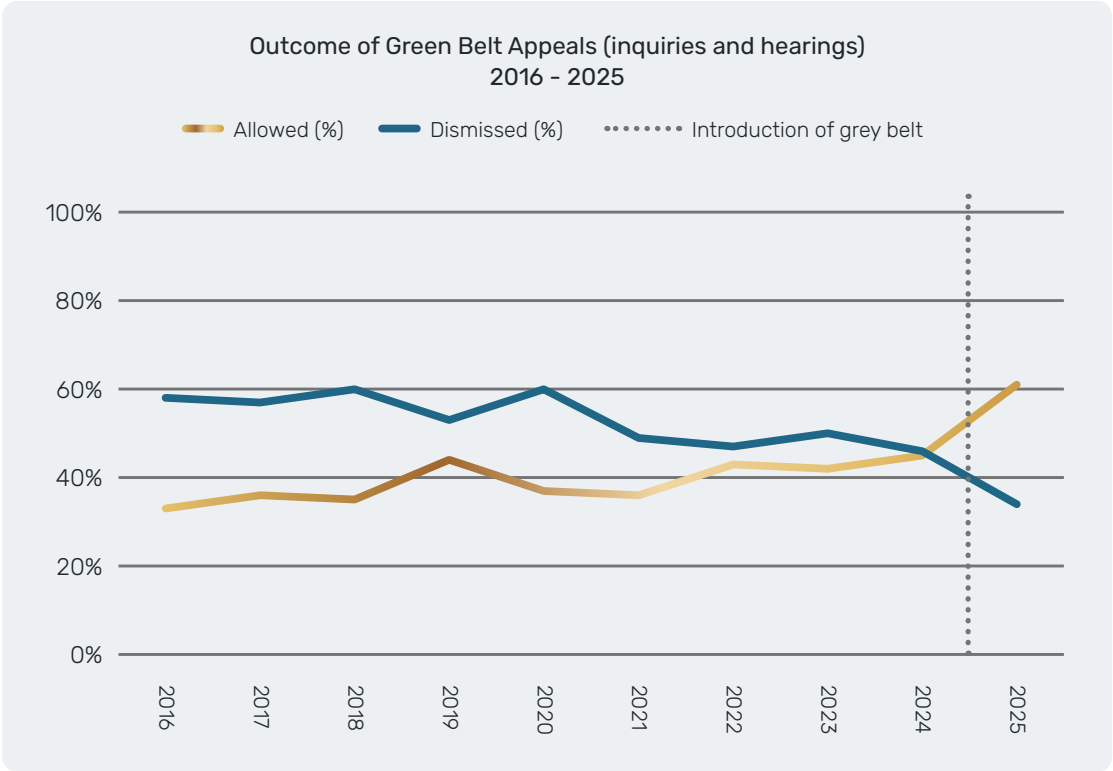
Looking back at Green Belt development

Previously, in general, development in the Green Belt would only be permitted if very special circumstances were demonstrated. This remains a high bar and reasons commonly had to be unique so they were not easily replicable for other proposals. As a result, the number of schemes permitted in the Green Belt was relatively low.

This is demonstrated by a review of COMPASS looking at the last 10 years. For example in 2024, over 1,000 appeals referred to “Green Belt” and of this total 25% were allowed and 73% dismissed. The remainder were part allowed or part dismissed. In terms of decision type, almost 85% were decided by written representations. This covers all land uses.

Therefore in an attempt to identify major schemes, we have looked at appeals that went to hearing or inquiry over the last 10 years. Significantly, 2025 is the first year that Green Belt planning appeals (for hearings and inquiries only) has seen more schemes allowed than dismissed (as a percentage). This coincides with the introduction of grey belt policy.

The average success rate over the past 10 years (excluding 2025) is 39% for Green Belt appeals that have gone to hearing or inquiry. It is currently at 61% for 2025, which represents a clear increase and notable change.



# 03 Major Residential Grey Belt Planning Appeals

This section discusses key considerations that we have identified in major residential grey belt planning appeals.

In total, there have been 20 major residential grey belt planning appeals decided (between Thursday 12 December 2024 and Sunday 31 August 2025). Only four of these have been dismissed, which means that 80% have been allowed. This figure is significant and demonstrates the impact of grey belt policy.

## List of major residential grey belt planning appeals

### Allowed - 16

- 21 February – Land at former Court Lane Nurseries, Court Lane, Hadlow (Tonbridge and Malling Borough Council) for 57 dwellings.
- 12 March – Land at Grove End, Bagshot (Surrey Heath) for 135 dwellings.
- 14 March – Land west of Sea View Drive, Hest Bank, Lancaster (Lancaster City Council) for 27 bungalows.
- 2 April – Land to the east of Platinum Way and opposite Grange Road, St Marys Platt, Sevenoaks (Tonbridge and Malling Borough Council) for 24 dwellings.
- 11 April – Land south of Kenley Aerodrome, Victor Beamish Avenue, Caterham, Surrey (Tandridge District Council) for 80 dwellings.
- 15 April – Land adjoining 451-469 Daws Heath Road, Hadleigh, Essex (Castle Point Borough Council) for 173 dwellings.
- 24 April – Former Weylands Treatment Works, Lyon Road, Walton-on-Thames, Surrey (Elmbridge Borough Council) for 40 dwellings.
- 9 May – Perrysfield Farm, Gibbs Brook Lane, Broadham Green, Oxted, Surrey (Tandridge District Council) for 29 dwellings.
- 9 May – Land at Bayswater Farm, Bayswater Farm Road, Oxford (South Oxfordshire District Council) for 76 dwellings.
- 17 June – Land west of Chapel Road, Smallfield, Surrey (Tandridge District Council) for 270 dwellings.
- 4 July – Land south of Hencliffe Way and west of Castle Farm Road, Hanham (South Gloucestershire) for 140 dwellings.
- 5 August – Land west of Leighton Buzzard Road, Hemel Hempstead (Dacorum Borough Council) for 390 dwellings.
- 6 August – Land east of Chase Mews and west of 310 The Chase, Benfleet (Castle Point Borough Council) for 47 dwellings.
- 13 August – Former Whitburn Lodge Public House, Mill Lane, Whitburn (South Tyneside Council) for 32 dwellings.
- 15 August – Land at south side of Houndsfield Lane, Hollywood (South Gloucestershire) for 50 dwellings.
- 29 August – Land south of Badgeworth Lane, Shurdington (Tewkesbury Borough Council) for 50 dwellings.



### Dismissed - 4

- 26 February – Broom Lodge, Stanwell Road, Horton (Royal Borough of Windsor and Maidenhead) for 10 dwellings.
- 16 April – Ashstead Park Garden Centre, Pleasure Pit Road, Ashted, Surrey (Mole Valley District Council) for 23 dwellings.
- 3 June – Bricket Wood Sports and Country Club, Paintball Site & Bricket Lodge, Lye Lane, St Albans (St Albans City and District Council) for 115 dwellings.

In addition, land south of Leighton Road, Stanbridge, Bedfordshire (Central Bedfordshire Council), for 43 dwellings, plus a care home, was dismissed on 24 December 2024. Although the decision is post-NPPF 2024, the hearing took place on 22 October 2024 (before grey belt policy was introduced). However, the Inspector considered the NPPF 2024 and invited responses on it from the main parties.

Finally, it is important to note land at Broad Lane, Holtspur, Beaconsfield (Buckinghamshire Council), for 120 new homes was dismissed on 24 February 2025. This decision was subsequently quashed by the High Court in May 2025.

*A clear majority of major residential schemes in the grey belt are succeeding at appeal, signalling a real shift in planning outcomes.*



## Grey belt the game changer, if you didn't hear it the first time...

The level of allowed appeals is significant and clearly demonstrates the impact that grey belt policy is having on the planning system.

A success rate of 80% for Green Belt planning appeals (inquiries and hearings only) cannot be over-stated. As previously mentioned, looking at Green Belt appeals (inquiries and hearings only), the success rate in 2025 is more than 60% compared with the 10-year average of around 40%. This shift is significant.

Marrons will continue to monitor grey belt planning applications and will set out an enhanced like-for-like comparison in January 2026 (following 12 months of grey belt policy).

Key lessons learned from the 20 major residential grey belt planning appeals are set out in Section 3. These focus on the six grey belt tests including the grey belt assessment, site sustainability, demonstrated need and the Golden Rules.

The four dismissed appeals are also covered in more detail as it is necessary to understand why these proposals failed the grey belt tests. Admittedly, the sample size (of four) is small but we can only work with what is in front of us.

Looking at the major residential grey belt planning appeals allowed, in total they yield around 1,600 new homes. We expect this number to increase (especially based on the higher success rate evidenced) and in combination with any forthcoming appeals we would also anticipate more local decisions at planning committees. Therefore, the overall number and proportion of planning applications in the Green Belt granted planning permission is increasing as a result of grey belt policy.

The success rate of 80% (at planning appeal) is compelling evidence to present to local planning authorities, including planning officers and members, to demonstrate how grey belt policy is being positively interpreted by the planning inspectorate.

In this respect, it is positive we are seeing more and more local decisions with planning committees consenting grey belt schemes in Basildon Borough Council, Buckinghamshire Council, Solihull Borough Council, and St Albans City and District Council. Some of these consents are based on a grey belt case and some are based on very special circumstances, and many of these local planning authorities have historically sought to resist development in the Green Belt. The tide may be turning with potentially increased willingness to permit appropriate and sustainable development.

It is positive that planning officers and members – like all other parties involved in the planning system – are advancing their understanding of grey belt and are implementing the policy as the Government intended to boost the supply of new homes to help address the national housing crisis.

As demonstrated with major residential grey belt planning appeals – as with any planning appeal – there is no one size fits all approach as each proposal is assessed on a case-by-case basis. As a result, most of the decisions appear to be relatively consistent. However, there are some anomalies, as illustrated by the High Court quashing the dismissed appeal at Broad Lane.

The greater consistency in decision-making aligns with the more objective approach towards Green Belt assessment as a result of the revised NPPF and NPPG on Green Belts. This has had a direct impact on the planning system by making it simpler, faster and more certain, all of which are long-standing objectives.

We support the introduction of grey belt policy as it provides a clear window of opportunity to landowners and developers to bring forward development in the Green Belt in the shorter term – e.g. via a planning application – rather than pursuing a longer-term land promotion approach to seek to secure a site allocation in a new Local Plan.

## Approach to grey belt assessment

### NPPG guidance

The approach to grey belt assessment in appeal decisions generally follows the steps set out in the NPPG on Green Belt in Figures 1 and 2, which are set out below.

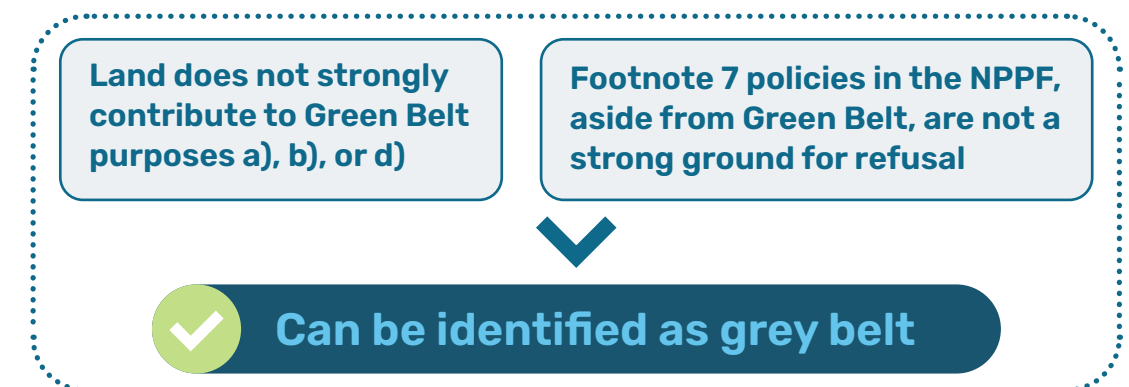


Figure 1. When can land be identified as grey belt  
Paragraph: 007  
Reference ID: 64-007-20250225

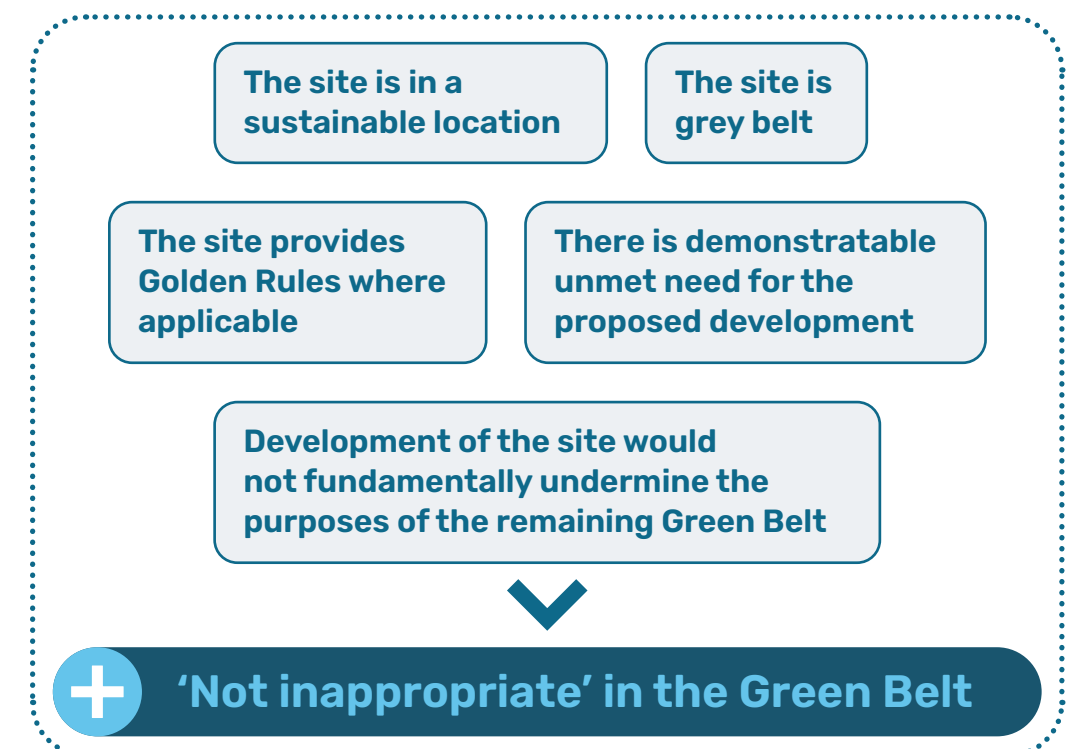


Figure 2. When is development in the Green Belt not inappropriate under paragraph 155 of the NPPF?  
Paragraph: 010  
Reference ID: 64-010-20250225



## Grey belt tests

In summary, there are six grey belt tests.

The first two tests determine whether a site utilises grey belt and tests 3-5 assess whether the proposals would not be regarded as inappropriate development in the Green Belt.

The final test considers the Golden Rules requirements. This is significant because assuming all tests are passed, in accordance with paragraph 158 of the NPPF, “a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”.

This reference reinforces how grey belt policy provides a clear window of opportunity to navigate proposals through the planning system to achieve consent.

### Grey Belt Tests

#### Test 1: Designations

Do any designations exclude the Site from being grey belt because they would form a strong reason to refuse a planning application (in accordance with Footnote 7 of the NPPF)? If no such designations exist the Site can be grey belt assuming Test 2 is passed.

#### Test 2: Purposes Assessment

Does the Site not strongly contribute towards purposes A, B or D (in accordance with NPPF Annex 2 and Paragraph 155a)? If yes, the Site can be grey belt.

**If tests 1-2 are passed a site is grey belt.**

### NPPG Figure 1 (can site be grey belt)

#### Test 3: Impact on remaining Green Belt

Would development at the Site fundamentally undermine the purposes of the remaining Green Belt across the area of the plan (in accordance with Paragraph 155a of the NPPF)?

#### Test 4: Need

Is there demonstrable need for the proposed development (in accordance with Paragraph 155b of the NPPF)? Demonstrable need exists if the council cannot demonstrate a five year housing land supply or its Housing Delivery Test result is below 75%.

#### Test 5: Sustainability

Is the Site in a sustainable location for development and do the proposals promote sustainable transport (in accordance with Paragraphs 110, 115 and 155c of the NPPF)?

**If tests 3-5 are passed the site would not be regarded as inappropriate development in the Green Belt.**

#### Test 6: Golden Rules Requirements

Can the proposals achieve Golden Rules requirements relating to provision of affordable housing, infrastructure and open space provision (in accordance with Paragraph 156 of the NPPF)?

**If yes, significant weight in favour of granting permission.**

### NPPG Figure 2 (is development in the Green Belt not inappropriate)

The Green Belt is generally the first of the main issues discussed in the grey belt appeals. This matter generally relates to the effect of the proposed development on the Green Belt and whether the proposal would be inappropriate development in the Green Belt having regard to the NPPF.

## Very special circumstances

Of the 16 allowed appeals, only two (Perrysfield Farm and Whitburn Lodge) failed to pass the grey belt tests and subsequently demonstrated very special circumstances to achieve permission. The remaining 14 passed the grey belt tests and very special circumstances (and openness) were not considered.

Grey belt has not completely displaced very special circumstances, and it is not expected to. Very special circumstances currently remain necessary to consider, especially when passing the grey belt tests might be marginal or not possible, as a very special circumstances case can be presented as a fallback position.

In our experience, during the pre-application stage, local planning authorities are not always willing to commit to a site being grey belt and not being regarded as inappropriate development in the Green Belt. A common reason for this is that the council is usually working on a new Green Belt Study that has yet to be published and it feels it premature to provide a view. As part of these discussions, planning officers commonly suggest that very special circumstances should be set out as a fallback position. In practice, the very special circumstances case generally remains a combination of the benefits of development and in this respect, it is noticeable how much more weight is now attached to address housing needs than ever before.

Similarly, the test of impact on openness of the Green Belt is not generally undertaken as part of the grey belt planning appeals, particularly where the Inspector is of the view that a site utilises grey belt.

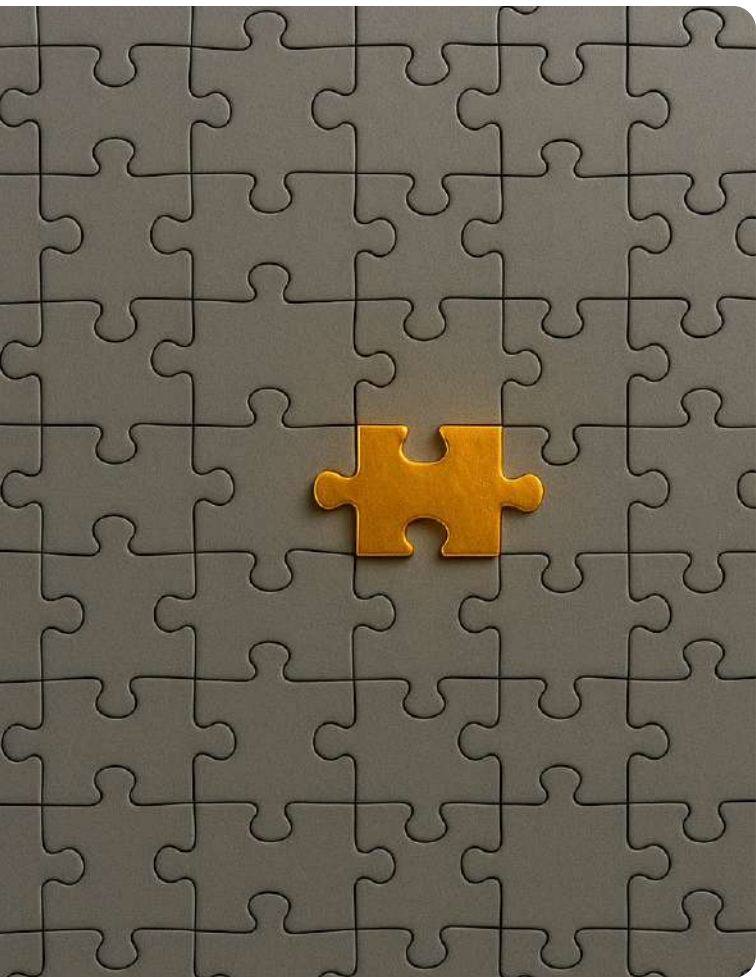
Very special circumstances are discussed more in relation to affordable housing provision under the Golden Rules requirements in section 3.



## Summary of dismissed grey belt appeals

Only four major residential grey belt planning appeals have been refused to date (up to Sunday 31 August 2025). These dismissals provide useful lessons to help appellants and applicants in respect of grey belt assessment.

Two of the four dismissed appeals are agreed by the main parties to be previously developed land ('PDL'). As a starting point, one would expect this to be positive. However, this was not the case as they both fail to meet paragraph 154 g) exception for complete or partial redevelopment of PDL. Therefore, the grey belt assessment is key. All of the appeals utilise grey belt but failed the appropriateness test and failed to achieve Golden Rules requirements, with viability cases for two being dismissed.



### Ashtead Park Garden Centre (Mole Valley District Council)

The main parties agree that the site is PDL – lawful use is a garden centre.

#### Complete or partial redevelopment of PDL

The Inspector concluded that the exception test relating to paragraph 154 g) of the NPPF is “not applicable” (paragraph 9) because the site contains “open areas of grass, a large proportion of which is currently covered by plastic sheeting” and “no evidence was presented that these areas have ever hosted any permanent structure or fixed surface infrastructure” (paragraph 8).

#### Grey belt assessment

The site is grey belt as it does not strongly contribute towards Purposes A, B or D. Notably, Ashtead is defined in the Local Plan as a “suburban village” however the Inspector considers that the settlement “now bears little resemblance to a village... ..both due to its size and the significant range of shops, services and facilities that it hosts. For the purposes of my assessment... ..Ashtead is in practice a small town” (paragraph 11).

#### Appropriateness assessment

For Test 3, Purpose C is considered (paragraph 16). For Test 5, the location is considered sustainable because the development would “be sustainably located insofar as it abuts the defined settlement, there would be some direct access to public transport, and the centre of Ashtead could be cycled” (paragraph 17). For Test 4, demonstrable need does not exist and therefore “failure to comply with just one of the criteria within paragraph 155 is sufficient to indicate that the development would be inappropriate in the Green Belt” (paragraph 19).

#### Golden Rules

Proposals failed the Golden Rules relating to provision of affordable housing because the scheme proposed only four affordable dwellings (out of 23). For the remaining rules, conditions were proposed to deliver the requirements.

### Bricket Wood Sports and Country Club (St Albans City and District Council)

Again, as a starting point all parties agreed that the entirety of the site is PDL.

#### Complete or partial redevelopment of PDL

In respect of paragraph 154 g), it was concluded that development would have a significant adverse impact in terms of spatial and visual openness with the proposals increasing floor area by around 860% and increasing footprint by 304% (paragraph 23) and although the site is well-screened being “largely visually enclosed this is not the same as it not being visible at all” (paragraph 29).

#### Grey belt assessment

The site is considered to be grey belt as it does not strongly contribute towards Purposes A, B or D.

#### Appropriateness assessment

It is considered that “the proposal would represent a clear and significant encroachment into the countryside in conflict with Purpose C” (paragraph 33). As a result, it failed Test 3.

The location of development is not sustainable (paragraph 49). One of the main issues (also connected to highway safety) related to delivery of a proposed footpath and lack of dedicated cycleway to serve the site. Distances set out in “Planning for Walking” guidance by the Chartered Institution of Highways and Transportation is referenced as best practice and the distances (relevant to the site) are considered to exceed this guidance.

#### Golden Rules

It also failed the Golden Rules requirements relating to provision of affordable housing and infrastructure. This is because an affordable housing figure was not agreed (paragraph 43) and there was considered to be “unacceptable harm to highway safety” (paragraph 44).

### Land South of Leighton Road (Central Bedfordshire Council)

This dismissed appeal was issued post revised NPPF however the hearing was held on 22 October 2024. The Inspector invited comments from the main parties to take account of the revised framework (paragraph 5).

As part of the Green Belt balance, the Inspector concluded that the site would meet the definition of grey belt (paragraph 47) however this does not affect the “conclusions on its inappropriateness, and its harms to openness and one of the purposes of the Green Belt, so has little bearing”.

This is partly due to Purpose C whereby it is stated that “the development would result in encroachment of the countryside, which is one of the purposes of the Green Belt, and there would be significant harm to the openness of the Green Belt, which is one of its fundamental aims” (paragraph 12).

Looking at the grey belt assessment in more detail, in relation to Purpose B, the Inspector agrees with the appellant that the wording of the NPPF in referring to towns (not settlements) and concerns “merging, not getting closer” (paragraph 8). Furthermore (in agreement with the Green Belt Study) “development of this tranche would result in a significant narrowing of the gap between neighbouring towns, but that a considerable distance would remain” thus there would be no conflict. We consider this to be an important distinction to make.

Finally, the main parties agree that the development would not meet the Golden Rules (paragraph 6).

### Broom Lodge (Royal Borough of Windsor and Maidenhead)

The site is located within the setting of one Grade I-listed building and two Grade II-listed buildings and, as a result, it failed the Footnote 7 test.

The status of the site is discussed and it is concluded that it “does not meet the definition of grey belt” (paragraph 35). This is based on earlier findings in the decision relating to flood risk and heritage, of which the latter “do provide such a strong reason” for refusing or restricting development.



# Lessons learned from dismissed major residential grey belt planning appeals

For just four decisions, there is a lot of takeaways:

- **PDL on site doesn't guarantee planning permission and engaging paragraph 154 g) of the NPPF. Evidence could be required to demonstrate PDL.**
- **Footnote 7 should be considered from the outset as not being able to overcome any designations can wipe out the grey belt case.**
- **A site can be grey belt yet fail the appropriateness tests and / or Golden Rules requirements. All of the dismissed appeals bar one (Broom Lodge) were considered to utilise grey belt. This suggests that the appropriateness tests and / or Golden Rules requirements might be a higher bar to pass than those relating to grey belt status.**
- **Failure to pass one of the three appropriateness tests and / or one of the three Golden Rules requirements can lead to a dismissal.**
- **Reliance on Local Plan interpretations can be challenged during decision-making e.g. in the case of Ashted being defined as a village by the council but called a town by the Inspector. Prepare a bulletproof case so that the decision-maker is in no doubt of settlement classification.**
- **Proposals at villages can still be turned down. All four dismissed appeals are at villages.**
- **Purpose C (relating to safeguarding the countryside) can be drawn into Test 3 which relates to the impact on the remaining Green Belt.**
- **Walking and cycling are fundamental to demonstrating a site represents a sustainable location (relating to Test 5).**
- **50% affordable housing provision on grey belt is becoming a non-negotiable and viability cases are not supported.**
- **Golden Rules requirements relating to necessary improvements to local infrastructure and provision of / improvements to accessible open space can be secured via condition or S106.**

*Our observations from the 16 allowed major residential grey belt appeals are considered next.*

## Observations from allowed major residential grey belt appeals

This section provides our observations and recommendations in relation to grey belt assessment based on a review of the 16 allowed major residential grey belt appeals.

In general, a consistent approach has been applied to each decision by the Inspector when undertaking the grey belt assessment, which is helpful. This approach can assist the preparation of grey belt assessments to support proposals.

It goes without saying that agreeing as much as possible (for example in a Statement of Common Ground or at the pre-application stage) with the decision-maker can greatly assist the site-specific grey belt assessment to support an appeal or application.

## Assessing and determining grey belt status

Tests 1 and 2 determine the grey belt status of a site. Each is discussed below.

### Test 1: Footnote 7

Test 1 is relatively objective and notably Footnote 7 is not engaged in any of the allowed appeals. This suggests that proposals are steering clear from designations that might form a strong reason for refusal. This is undoubtedly the starting point for any planning appraisal when assessing development potential of a site. Half of the appeals explicitly reference "Footnote 7".

The allowed appeals consider designations both within the site and those of relevance beyond the site. For example, for the Court Lane appeal, a nearby conservation area and listed buildings are considered in reference to Footnote 7 but they are assessed against paragraph 212, which deals with impact on the historic environment.

### Lessons Learned

**Consider all relevant designations both on and off site from the outset and any supporting assessments should be evidenced to help provide a clear response to Test 1.**



**Test 2: Not strongly contribute to Green Belt purposes A, B and D**

Test 2 receives the most attention in grey belt appeals and it is the most debated test across the industry. It is the most emotive test because it concerns the assessment of land against the Green Belt purposes. As previously mentioned, this assessment has become more objective. However, a degree of subjectivity remains.

*Test 2 is the most contested part of grey belt appeals, balancing objective guidance with planning judgement.*

**Purposes assessment and level of contribution**

The introduction of grey belt policy, in particular the NPPG on Green Belt, has made the purposes assessment much more objective, which is helpful. In practice, it is more nuanced, as demonstrated in the grey belt appeals.

This is clear to see in the appeal at Hencliffe Way where the Inspector considered at length the interpretation of the NPPG purposes assessment criteria stating that any purposes assessment “should not be a mechanical exercise” and it “may not always be clear cut” (paragraphs 15 to 24).

Furthermore, in the Sea View Drive appeal, the purposes assessment is referred to as a “matter of planning judgement” (paragraph 20).

In terms of level of contribution towards each purpose, the key test relates to whether the contribution is strong (in accordance with the grey belt definition in Annex 2 of the revised NPPF). The allowed appeals show that in some cases an Inspector might just find that the contribution is not strong without defining that exact level of contribution (e.g. weak or none, moderate or strong).

**Lessons Learned**

**The NPPG on Green Belt is essential to the purposes assessment and determining whether a site utilises grey belt. It should be considered in detail to set out an evidenced and credible grey belt case to leave the decision-maker in no doubt of grey belt status of the site.**

**Previous Green Belt studies**

A number of the allowed appeals refer to previous Green Belt Studies (undertaken by or on behalf of the council) and in some cases these studies date back a number of years. The weight attached to the previous Green Belt Studies varies as in some of the allowed appeals they have been utilised to inform findings of the purposes assessment (Test 2) and understanding of the impact on the remaining Green Belt (Test 3).

The mix of observations and levels of recognition on previous Green Belt Studies demonstrates the case-by-case nature of the grey belt assessment.

In the Hencliffe Way appeal, the Inspector acknowledges that previous Green Belt studies pre-dated the concept of grey belt. However, the revised NPPF did not change the Green Belt purposes so “conclusions remain valid” (paragraph 20).

Similarly, in the Sea View Drive appeal, the Inspector considers that the age of the Green Belt Review (from 2016) is “not to be a matter of any significant relevance” (paragraph 19).

In practice, Green Belt Studies assess strategic parcels, which are commonly much larger than development sites subject to planning applications. The matter of relevance is considered in two appeals as follows.

In the Leighton Buzzard appeal, the Inspector took the view that the findings of the Green Belt Study “cannot be transposed across the appeal site” (paragraph 146). This was, however, for a very specific reason relating to the site itself not impacting the Chilterns National Landscape. Furthermore, the Inspector gave “very limited weight to the council’s reliance on the appeal site not featuring in the preferred sites allocations being advanced through the plan making process”.

In addition, albeit a minor development appeal, the Inspector for Land south of Horseman Side (Brentwood Borough Council) explained that conclusions from Green Belt Studies that consider large parcels are not necessarily relevant for decision-making. It is stated that “looking at parcels is helpful in a strategic sense to inform plan making and future development growth. However, for decision making, it seems more relevant to look at a site-specific level for determining grey belt land, otherwise the scale could be too large and skewed by land some distance from the actual site” (paragraph 21).

Finally, in relation to emerging Green Belt Studies, albeit another minor scheme, an appeal in the London Borough of Bromley noted that “the council is in the process of assessing all Green Belt land in its area against the criteria for grey belt and wishes to wait for that work to conclude. Nevertheless, the assessment is not expected to be published until mid-2026, there are no interim findings before me and there is little else to substantiate the council’s contention that the appeal site performs well against the Green Belt purposes. I therefore give this consideration little weight” (paragraph 18). This shows that waiting on a further Green Belt Study is not an excuse not to determine the grey belt status of a site now.

**Lessons Learned**

**In spite of their relevance, it is necessary to fully understand the council’s opinion of a site’s contribution towards the Green Belt purposes as set out in previous Green Belt Studies. Following this a view on the relevance of the findings should be considered. In some cases, the previous Green Belt Study could support a grey belt case.**



### Settlement classification – what is a village?

Ten of the 16 allowed appeals relate to development at villages. Understanding settlement status is significant because villages cannot make a strong contribution to Purposes A, B or D according to the NPPG on Green Belts.

Each appeal establishes whether the settlement in question is a village or not. This is vital to the grey belt assessment as villages cannot be large built-up areas, merge or be historic towns.

A common approach is to utilise the Local Plan or evidence base first. This is demonstrated in the Smallfield appeal where the Inspector reviewed the settlement hierarchy to establish settlement classification and concluded that Smallfield is a village as it is a “Larger Rural Settlement” and referred to as a “village” (paragraph 20). This approach is generally difficult to challenge.

However, defining settlement classification is not always clear cut.

*Ten of the 16 allowed appeals were at villages - showing how settlement classification shapes grey belt decisions.*

In the Grove End appeal, the Local Plan referred to Bagshot as a large village and Windlesham as a smaller village. However, the Green Belt Review (2022) identified settlements (with 3,000+ population and 500+ dwellings) as towns, which makes Bagshot and Windlesham towns. The Inspector concluded that the Green Belt Study “is not capable of attracting the same weight as the development plan” (paragraph 14) and therefore considered the settlement to be villages of varying scales.

In the Daws Heath Road appeal, the Inspector discussed whether the settlement is a village or not in paragraphs 14 to 21. There are conflicting views in the council’s evidence base and in conclusion, it is observed “what is clear, is that there is not universal accord within the supporting evidence with regard to the matter of whether Daws Heath should be considered a town or village” (paragraph 20).

#### Lessons Learned

**The classification of the settlement is critical to the purposes assessment and the starting point should be the council’s published material including Local Plan and evidence base.**

Although development in the Green Belt at villages clearly carries less planning risk, it is important to recognise that 10 of the 16 allowed appeals relate to villages (and all four of the dismissed appeals were at villages). In our view, this shows that, taken as a whole, Green Belt development at a town or village is somewhat negligible.

*Moving on, we look at the Green Belt purposes one at a time.*

### Purpose A – “to check the unrestricted sprawl of large built-up area”

Purpose A is generally discussed at most length in grey belt appeals, which appears to be a direct result of the definition set out in the NPPG of large built-up areas (not being villages).

The critical test, which could lead to potential failure, relates to whether the proposals would lead to an “incongruous pattern of development e.g. extended ‘finger’ of development” as defined in the NPPG.

In the appeal at the Former Weylands Treatment Works, it is said that “if developed, the site would be a logical extension of the built area that would not result in an incongruous pattern of development” (paragraph 18).

In the Hencliffe Way appeal, it is notable that “the large built-up area in question is Bristol urban area, the eastern fringe of which includes Hanham” (paragraph 14). This is clearly not a village.

Various appeals highlight the impact that strong boundary features can have on making the case for weaker contribution towards Purpose A. We suggest this is arguably more important than whether a settlement is a village or not.

In the Court Lane appeal the Inspectors comment that even if Hadlow was a large built-up area the role of the site “is weakened as it is contained on three sites by development” (paragraph 18).

In the Kenley appeal, the site is on the edge of a built-up area. “However, it is largely enclosed by residential development and is restricted to the north by Kenley Airfield, all of which strongly limit the sprawl into the Green Belt”. Also, it is “subject to urbanising influences through the containment of a school at its centre and the main road to the airfield (Victor Beamish Avenue), in addition to being, at least in large part, previously developed land (PDL). The site’s contribution to this purpose is therefore weak, the sprawl is not unrestricted, and the development would not harm this purpose” (paragraph 16).

In the Chase Mews appeal, “the site is thus largely enclosed by significant existing development” and it is therefore found to make “only a weak contribution” (paragraph 31).

Also, the proposed development can be relevant to the assessment as in the Leighton Buzzard Road appeal, “the submitted plans demonstrate that the site can be developed in a manner that would be consistent with the prevailing settlement pattern of the area” (paragraph 147). This relates to containment in terms of the relationship between the proposals and the settlement.

#### Lessons Learned

**Consider the site and surrounding features in detail from the outset, as well as the proposed development, to prepare an evidenced response to Purpose A. The relationship between the site and settlement is important and in combination with levels of containment and defensible boundaries, potentially aided by proposals. Whether the settlement is a large built-up area or not becomes less relevant, because a good site is a good site.**

**Purpose B – “to prevent neighbouring towns merging into one another”**

Purpose B is often debated by parties in appeals, but in practice evidencing a strong contribution is a high bar. There are similarities to the assessment of Purpose A as containment and strong boundaries can help demonstrate contribution is weaker.

In the Court Lane appeal, containment is key as there is existing “built form” to the north and east (paragraph 20). Notably the Inspector does not go into detail on what the “built form” exactly is as part of the assessment.

The allowed appeals highlight that there are two dimensions to merging relating to the physical and visual. Both are generally considered.

In the Grove End appeal, it is noted that “the development of the appeal site would not result in Bagshot or Windlesham merging or appearing materially closer to one another” (paragraph 14). Also, in the Former Weylands Treatment Works appeal, it is noted that the gap between settlements is not free from development (paragraph 19) and this counts in favour of the site.

Some appeals also consider the size of the gap between settlements. In the Houndsfield Lane appeal, the council considered part of the parcel where the site sits to make strong contribution to separation of settlements (paragraph 6). The Inspector goes on to explain that the site itself comprises a “relatively small portion” of a “large gap” (paragraph 7) and that there would be “no visual loss of separation”. Taking account of the Green Belt Study, it is concluded that “whilst I am mindful that the parcel, as a whole, may make a strong contribution to Purpose B, the same cannot be said for the appeal site on its own given its location and modest scale”. Therefore, scale of the site and the gap has a role to play in the assessment.

In the Chase Mews appeal, the assessment of merging is unique as “the merging of Hadleigh and Thundersley has already occurred to a significant degree” (Officers Report). The Inspector observes that development is visible on all sides of the site in an “almost continuous stretch of development linking the settlements” (paragraph 32).

Back to considering the impact of settlement classification. This is important for assessing merging, as in the Sea View Drive appeal, the site is considered to be self-contained, and “has a strong connection to the settlement of Hest Bank and does not play a significant role in preventing the visual or physical merging settlements, whether that is between towns or villages” (paragraph 18). The Inspector makes the observation that the conclusion would be the same regardless of whether the settlements in question are towns or villages, and this demonstrates the takeaway that in practice settlement classification does not carry as much weight as one might expect.

**Lessons Learned**

Similarly to Purpose A, consider the site context from the outset, as it is off site features that will impact both visual and physical dimensions of merging. It is useful to consider the assessment even if villages are involved as the decision-maker could look at the site from this angle so preparing a robust response to potential challenge is important.

**Purpose D – “to preserve the setting and special character of historic towns”**

Purpose D generally receives the least amount of airtime in the appeals and main parties are often in agreement as, in accordance with the NPPG, it relates to historic towns only.

This approach is demonstrated in the Leighton Buzzard Road appeal, where the Inspector comments that “Piccotts End is a historic village, not a town or part of one. As such, Purpose D is not relevant to my determination” (paragraph 150).

Also given any potential heritage and historic environmental considerations it can be covered in reference to paragraph 212 of the NPPF.

Some of the appeals consider conservation areas and listed buildings, and in the Kenley Aerodrome appeal, the Inspector notes that as the site is enclosed by development, the impact on the conservation area in which it lies is weaker (paragraph 16).

**Lessons Learned**

Although the assessment is relevant to historic towns only, it is important to consider any heritage assets in reasonable proximity to the site.

**The other purposes**

Although not part of the grey belt assessment, some of the appeals consider Purpose C (“to assist in safeguarding the countryside from encroachment”) and Purpose E “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”.

In total, four of the 16 allowed appeals considered Purpose C and set out a level of contribution. In addition, three of the four dismissed major residential grey belt appeals considered Purpose C.

**Lessons Learned**

It is useful to understand the council’s view on Purpose C and Purpose E based on previous Green Belt Studies, and it is important to be prepared to set out an appropriate response to the decision-maker if required – especially as Purpose C can impact Test 3 relating to impact on the remaining Green Belt.





# Concluding Thoughts on the Purposes

It is undeniably positive that the purposes assessment has become more objective with the NPPG providing clear guidance. In practice, and as expected to a certain extent given the nature of the purposes, the assessment still requires a degree of judgement as noted in some of the appeals.

In updating the NPPF, the Government elected not to amend the wording of the Green Belt purposes and has instead provided guidance on its interpretation in the NPPG.

Overall, assuming a site represents a logical location for development, the bar is relatively high for it to make a strong contribution. A strong contribution towards any one of the Purposes (A, B or D) results in failure of Test 2.

The purposes assessment also demonstrates the role that council documents (e.g. Local Plan, evidence base and previous Green Belt Studies) can have on Test 2 and, as an appellant or applicant, this material should be utilised where possible to support the grey belt credentials of a site.

In spite of the assessment becoming more objective, a subjective and potentially rogue element remains in relation to the application of Purpose C. Notably, the NPPG does not provide assessment criteria for Purpose C so it is down to the decision-maker to firstly determine whether to consider the purpose, and secondly decide how to assess it. Given the nature of most Green Belt sites, in that they are generally part of the countryside, there is a greater chance that a site would make a stronger contribution to Purpose C.

As a recommendation to Government relating to the grey belt assessment, we suggest it would be helpful if the NPPG was updated to explain if and when Purpose C should be considered and, if so, how it should be assessed.

*The grey belt purposes assessment is now clearer and more consistent, with national guidance setting a stronger framework for decision-making. This has raised confidence in the process and helps applicants build more robust cases.*

*Yet challenges remain: even a single strong contribution to one Green Belt purpose can block a site, and the lack of clear criteria for Purpose C leaves room for subjectivity. Clearer guidance here would bring much-needed consistency.*





## Assessing appropriateness of development in the Green Belt

Tests 3 to 5 determine whether a site is not inappropriate development in the Green Belt. Each test is discussed below.

### Test 3: Whether development would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan

The suggested approach to undertaking Test 3 is set out in the NPPG. To make the judgement, it refers to “all five Green Belt purposes” and ensuring that they can continue to function in a “meaningful way”.

In most cases, the allowed appeals consider Test 3 in a concise manner. For example, in the Grove End appeal it constitutes only three lines. It states that “given the scale, location and extent of the site area, and its containment by the A322, Grove End and London Road, the development would not fundamentally undermine the purposes of the remaining Green Belt across the plan area” (paragraph 16).

As demonstrated in the appeals, key factors influencing the assessment relate to site characteristics including scale and location as well as consideration of performance in previous Green Belt Studies as in the Hencliffe Way appeal.

As previously mentioned, Purpose C can emerge as a consideration as part of Test 3, and this is demonstrated in the Bricket Wood appeal, which failed this test.

#### Lessons Learned

As with the purposes assessment, it is crucial to understand the council’s view on the site and how it performs (albeit as part of a wider parcel) against the five purposes. Deploying some explanation of how the site sits within the much larger context of the Green Belt as a whole can also assist the response.



### Test 4: Demonstrable need

This is the most objective grey belt test as the answer is simply yes or no because the test is against the council’s housing position (five-year housing land supply or housing delivery test result).

The nuances emerge if the appellant or applicant seeks to challenge the housing position and/or say if they consider the housing position to change over time – for example from submission date to determination date, which happened in the Hencliffe Way appeal.

In addition to housing, any additional land uses must be justified with a needs case as demonstrated in the Court Lane appeal for a new nursery and Former Weylands Treatment Works for a range of uses including recycling centre.

#### Lessons Learned

Understand the housing supply position over the course of the application lifecycle, covering pre-application, submission, determination and potentially appeal stages as a change to the housing supply position can impact the outcome of the appropriateness assessment.

### Test 5: Sustainable location

Demonstrating a sustainable location goes a long way in supporting the grey belt case (and overall case for development). This test is relatively straightforward and relies on accessibility to local services and facilities, and as such can be supported by the Local Plan and evidence base. This is highlighted as a number of appeals reference the council’s settlement hierarchy and any associated or supporting material in relation to the description of the settlement in question.

A sustainable location is further evidenced if there are “genuine choices of transport beyond private motor vehicles” (paragraph 10) as described in the Houndsfield Lane appeal. Walking and cycling routes are key to sustainability, and notably this was one of the tests that the Bricket Wood appeal fell short on.

In addition, some appeals recognise that the sustainability of a location could improve with the proposed development and that improvements can be secured via condition or S106.

#### Lessons Learned

As with the other tests, understanding the council’s view and vision for the settlement in question is key and makes the case for sustainability of the location as objective and evidenced based as possible. If a site is struggling, it is helpful to consider what the proposed development could do to enhance sustainability credentials.



## Meeting the Golden Rules requirements

This section considers the Golden Rules requirements set out in paragraph 156 of the NPPF.

The Golden Rules carry great weight because assuming all the requirements are passed, in accordance with paragraph 158 of the NPPF “a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”. This is a straightforward and powerful message from the Government to decision-makers.

Therefore, achieving the Golden Rules requirements has the effect of reducing planning risk and increasing certainty and chances of success for proposals.

Overall, the Golden Rules reflect the Government’s political calculation: development in the Green Belt will be permitted, but in return, greater affordable housing and community benefits are expected.

The provision of infrastructure and open space are similar so they are discussed first, before affordable housing is considered.

### **Provision of infrastructure**

“Necessary improvements to local or national infrastructure” are required for major development in the Green Belt in accordance with national policy.

The level of infrastructure improvements is directly related to the scale of the proposals and is considered in this context. In some cases, improvements relate to the provision of facilities, open space or upgrades to enhance accessibility. Several appeals refer to securing these via S106 and/or conditions.

### **Provision of accessible open space**

“...the provision of new, or improvements to existing green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through on-site provision or through access to off-site spaces” are required for major development in the Green Belt in accordance with national policy.

Most sites provide new accessible open space and these can be accessed by new and existing residents, and – similarly to infrastructure improvements – these can be secured via S106 and/or conditions.

The Former Weylands Treatment Works appeal even goes on to explain that open space would “also support nature recovery and urban greening” (paragraph 24).

### **Provision of affordable housing**

In accordance with national policy, 50% affordable housing provision for major development in the Green Belt is set “by default”. Alternatively, it can be set at 15 percentage points above the local policy requirement (and capped at 50%).

The appeal decisions show that the national policy requirement must be achieved otherwise proposals fail the Golden Rules test.

The appeals demonstrate some examples where the 15% uplift on local policy has been secured and, in some cases, the appellant has increased affordable housing provision to 50% during the appeal process (e.g at Court Land and Kenley Aerodrome).

### **Viability Considerations (and very special circumstances)**

Two of the four dismissed appeals demonstrate that viability cases to support a lower level of affordable housing are not supported.

Following the publication of the revised NPPF, many landowners and developers assumed that the Golden Rules requirement for higher levels of affordable housing was subject to viability as signalled in the previous consultation draft NPPF.

However, the NPPG guidance is clear as “where development takes place on land situated in, or released from, the Green Belt and is subject to the ‘Golden Rules’ set out in paragraph 156 of the NPPF, site specific viability assessment should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing.”

As policy stands, running a viability case is not a way to avoid meeting the Golden Rules. Into the future, this might need to be revisited by the Government as the issue is not just one of viability, but also of deliverability, particularly regarding the capacity of the affordable housing sector.

This presents a conundrum. A site can be grey belt, but if it cannot deliver the required level of affordable housing, it fails to meet the Golden Rules, and therefore reverts to the need to demonstrate very special circumstances under paragraph 153 of the NPPF.

Some applicants are opting for the very special circumstances route, despite their site being grey belt, to avoid the higher affordable housing levels required under the Golden Rules. This can be a higher risk strategy at appeal as non-compliance with national policy may weigh heavily against the scheme.

However, securing decisions under a very special circumstances route at the local level remains possible if supported by the local planning authority. This was the case for an outline planning application in the grey belt on Land south of Knowle (Arden Triangle) for up to 450 homes and land for a new primary school in Solihull Borough Council. The application proposed 40% affordable housing (in line with the adopted Local Plan) rather than the 50% required under the Golden Rules. Despite significant weight given to the conflict with national policy, the scheme’s wider benefits led the committee to resolve to grant permission under the very special circumstances route.

***Meeting the Golden Rules cuts planning risk and gives proposals significant weight in favour of approval.***





# 04 Conclusion and Final Thoughts

This section sets out our concluding comments based on the review of grey belt appeals to date by considering the impact of grey belt.

In conclusion, the introduction of grey belt policy has been a game changer and has had a positive impact.

## Impact of grey belt

### Impact on the planning system

The introduction of grey belt policy has helped to simplify and speed up the planning system whilst creating more certainty for all parties, all of which are long-standing, and cross party objectives for the planning system.

It is important to caveat that its impact relates to one source of land supply only (the Green Belt) and that other sources, as widely publicised, have experienced difficulties in recent times.

### Impact on sustainable development

Grey belt arguably supports each of these dimensions of sustainable growth. As a starting point, it has successfully varied and increased sources of housing land supply, whilst through the Golden Rules (which are relevant to all development in the Green Belt) boosted delivery of affordable homes and enhanced local infrastructure, including the creation of new accessible open space.

### Impact on national housing crisis

There is a national housing crisis, layered within which there is an affordability crisis relating to housing, alongside sustainable development priorities relating to the environment, society and economy. Grey belt has undoubtedly increased the supply of homes with at least 1,600 homes allowed at appeal, which would almost certainly not have come forward pre-grey belt policy.

Moving on, we would expect that more and larger grey belt sites will come forward. Strategic sites (in the Green Belt) most commonly come forward via Local Plans and it is important that plan-makers have certainty over the future of grey belt policy to prepare and adopt new Local Plans.

### Impact on decision-making

There is no denying that the introduction of grey belt policy is leading to more planning permissions for development in the Green Belt, including more housing. Looking at major residential grey belt planning appeals, the success rate is 80%, and for the first time in 10 years, 2025 has seen more allowed appeals (for inquiries and hearings) than dismissals.

Grey belt is leading to more planning application submissions (especially in 2025) as a result of the immediate window of opportunity that grey belt policy has created for planning applications. This is expected to last for at least the next 2-3 years.

The impact of this on resources within the planning system will be tested over the next 6-12 months and beyond. Local planning authorities, planning inspectorates and statutory consultees will be under increased pressure so how the Government navigates this period is crucial to the continued success of grey belt policy.

Decision-making at the local level will be key to whether more schemes end up at appeal. To date, it is positive that decision-makers (including planning officers, members and planning inspectorates) appear to be implementing grey belt policy as the Government intended to help boost the supply of new homes.

### Impact on plan-making

The impact on plan-making is less obvious because Local Plans take several years to prepare. In February 2025, the Government awarded funding to local planning authorities to prepare new Green Belt Studies that identify grey belt land to ultimately support future site allocations.

An unintended consequence might be linked to an increased level of planning permissions in the Green Belt (as a result of the immediate grey belt planning applications), which means that certain settlements, particularly some villages, are not able to accommodate any more development. In this sense, in some locations, plan-making could be driven by such consents.

In practice, we do not consider this to be a negative as it would mean that local planning authorities, already with stretched resources, could be able to focus on strategic matters and strategic sites, with future Local Plans able to focus on visionary allocations as a result of National Development Management Policies reducing local paperwork. Plan-makers must focus on delivering the right development in the right location.

Most Green Belt greenfield land on the edge of settlements can now potentially be defined as grey belt. For grey belt to deliver more new homes, the number of schemes must be increased and Local Plans are the leading mechanism in the planning system to achieve this ambition.

### Impact on viability

Following the publication of the revised NPPF, many landowners and developers assumed that the Golden Rules requirement for higher levels of affordable housing was subject to viability as signalled in the previous consultation draft NPPF.

However, the NPPG guidance is clear as “where development takes place on land situated in, or released from, the Green Belt and is subject to the ‘Golden Rules’ set out in paragraph 156 of the NPPF, site specific viability assessment should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing”.

As demonstrated in some of the appeals, viability cases have been dismissed. There appears to be a clear message that meeting the Golden Rules is non-negotiable.

Into the future, especially in respect of the delivery of affordable housing and the level of new homes coming to the market as a result of grey belt consents, this viability matter might need to be revisited by the Government.

***Grey belt has simplified planning and created greater certainty, with 2025 marking the first year in a decade where more Green Belt appeals were allowed than dismissed.***



## Recommendations for the future...

Looking ahead, it's important for political parties to recognise the significant beneficial and positive impact that grey belt policy has had on the planning system in such a short space of time. Simplifying the planning system and making it faster and more certain have long been cross party objectives. It is vital for the planning system to build upon this success by introducing further positive policy interventions to support the delivery of sustainable development.



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# Grey Belt

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