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# **The Otford Society**

**24<sup>th</sup> April 2026**

# **Green Belt grey belt and the Future of London's Green Belt**

**Richard Knox-Johnston**

# Agenda



- **The London Green Belt Council**
- **Government changes to planning law**
- **NPPF 2024**
- **Consultation 2025**
- **Grey belt**
- **The future of London's Green Belt**



# **The London Green Belt Council**



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# **Government changes in planning 2024-2026**

# Changes in Planning



- **New NPPF 2024**
- **Planning and Infrastructure Bill**
- **New Towns Taskforce**
- **New Towns selection**
- **Devolution and LGR**
- **Land use consultation**
- **New local plan making system**
- **NPPF consultation 2025**
- **Strategic Planning**



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# **NPPF December 2024**

# Grey belt NPPF Dec 2024



**“grey belt” is defined as**

- **Land in the Green Belt comprising Previously Developed Land and any other parcels and/or areas of GB land that makes a limited contribution to the five GB purposes ( para 143)**
- **GB with high sustainable development potential**

# **NPPF Dec 2024**



## **Para 146**

**“Exceptional circumstances include, but are not limited to, instances where an authority cannot meet its identified need for housing through other means. In these circumstances authorities should review GB boundaries and propose alterations to meet these needs in full.”**

# **NPPF Dec 2024**



## **Para 143**

### **GB serves five purposes**

- 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**
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

# **NPPF Dec 2024**



## **Para 148**

**“Where it is necessary to release GB land for development, plans should give priority to previously developed land , then consider grey belt which is not previously developed and then GB locations.”**



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# **NPPF Consultation**

## **December 2025**

# **NPPF Consultation**



**Headlines – government introduced:**

- **“grey belt” definition**
- **Review of Green Belt – development needs not met**
- **Changed replaced “previous haphazard” approach to GB designation and release with:**
  - **“a modern, strategic, targeted approach”**
  - **“support wider ambitions to unlock (GB) land for development & drive higher densities around train stations” – land released in GB to support this policy**
- **Stations – well connected**



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# **Plan-making policies**

# **NPPF Consultation (LPs)**



## **GB1: Establishing New Green Belts**

**“This reflects the principle that GBs should only be designated in exceptional circumstances and should not inhibit sustainable development.”**

# **NPPF Consultation (LPs)**



## **GB2: Assessing Existing Green Belt Land**

- **Sets out how GBs should be reviewed and assessed.**
- **Should assess GB and identify areas for future consideration**
- **Assessments should form a routine part of plan-making**
- **include identification of grey belt**

# **NPPF Consultation (LPs)**



## **GB3: Altering Existing Green Belt Boundaries**

- **Exceptional circumstances are fully evidenced and justified:**
  - **as much brownfield as possible**
  - **optimising density**
  - **assessing sites outside the GB**
- **Land around stations**

# **NPPF Consultation (LPs)**



## **GB4: Defining Green Belt Boundaries**

- **LPs only to include land necessary to keep as open GB**
- **Include villages – only if necessary to restrict development (Use Conservation areas to protect!)**
- **Broadly consistent with the spatial strategy for:**
  - **accommodating growth**
  - **meeting development needs both in GB and adjoining areas**
  - **any alterations must promote sustainable patterns of development**

# **NPPF Consultation (LPs)**



## **GB5: Beneficial uses of GB Land**

**Benefits for communities and nature**

**More positive expectations on development plans**

- **Public access**
- **Nature recovery**
- **Forests**
- **Loss of GB – compensatory improvements to remainder including:**
  - **Nature Recovery Strategies**
  - **Forests**
  - **protected landscapes**



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# **National decision- making policies**

# **NPPF Consultation (LPs)**



## **GB6: Control of development in the GB**

- **Inappropriate unless in GB7**
- **Inappropriate:**
  - **harmful to GB**
  - **very special circumstances (VSC)**
  - **substantial weight given to harm of GB**
  - **include harm to openness**
- **VSC may include energy projects**

# **NPPF Consultation (LPs)**



**GB7: Development which is not inappropriate in the GB**  
**Not inappropriate = not regarded as harmful**

- **Development for agriculture, horticulture and forestry**
- **Re-use “permanent and substantial” building**
- **Limited infilling in villages**
- **Limited affordable housing for community needs**
- **Brownfield – not cause impact on openness**
- **Near a well-connected rail station – density requirements**

# **NPPF Consultation (LPs)**



**GB7: Development which is not inappropriate in the GB**

**Not inappropriate = not regarded as harmful**

- **Certain other forms of development**
  - **mineral extraction**
  - **engineering operations**
  - **transport, electricity and water infrastructure**
  - **community right to build**
  - **outdoor sport, cemeteries and burial grounds**
  - **also, buildings for above**

# **NPPF Consultation (LPs)**



## **GB8: The Golden Rules**

**Land in GB in preparation or review or planning application – should include:**

- **Affordable housing**
- **Improvements to infrastructure**
- **Green space**
- **Positive contribution to landscape**
- **Support nature recovery**
- **Meet national standards**
- **Viability!\*?**

**grey belt**

# **NPPF Consultation Dec 2025**



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## **GB2: Assessing existing GB land**

**The preparation of a SDSs should be informed by an assessment of the strategic role of GB land within the strategy area. Take account of:**

- 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**
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

# **GB becomes grey belt**



**Only if it fails to:**

- a) To check the unrestricted sprawl of large built-up areas**
- b) To prevent neighbouring towns merging into one another**
- d) To preserve the setting and special character of historic towns**

**Does not include:**

- c) To assist in safeguarding the countryside from encroachment**
- a) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**



# **GB becomes grey belt**



**Land north of Mansion House Farm, Bedmond, Abbots Langley  
LPA – Three Rivers**

- Appeal recovered by the SoS for MHCLG and determined in May 2025**
- Granted planning permission, citing grey belt as rationale**
- Agricultural land with two footpaths**
- Construction of data centre of up to 84,000 square metres across two buildings**



# **GB becomes grey belt**



**Land east of South Mimms Services, St Albans Road, South Mimms**

- **Described as one of the largest data centres in Europe has been given the go-ahead.**
- **Hertsmere Borough Council's planning committee has approved outline plans (citing grey belt reasons) for the development near the M25 South Mimms service station in Hertfordshire, that will cover 87,000 sq m.**



# **GB becomes grey belt**



**Application for 400 houses – land west of Leighton Buzzard Road, Hemel Hempstead:**

**Refused by Dacorum Council**

- Undeveloped, open countryside**
- Near a nature and wildlife site**
- Crossed by several significant and well-used footpaths**
- Site included a nationally recognised Roman Villa**
- On the west side of River Gade – chalk stream – subject to flooding**
- In the setting of the historic village of Piccotts End**
- Situated in GB**

# **GB becomes grey belt**



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**Appeal**

**Applicant argued grey belt**

**Inspector agreed, in spite of all the mitigating factors**

**Appeal allowed**



# **Sir James Cleverly**



*"The next Conservative government will scrap the so-called 'grey belt', to protect our greenbelt, build on brownfield land first and in our cities where the need is greater."*

# Gareth Bacon



***“The GB is under attack from this government. Why will the Minister not just admit that the term “grey belt” is in fact a dishonest concoction designed to mislead the general public”***

# **Matthew Pennycook - Minister**



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*“It is anything but a dishonest concoction. As I have said, grey belt land is determined by LPAs where it does not meet the purposes of the GB, as set out”*

*“The government is committed to preserving GBs and the NPPF still contains strong protections for the GB, making it clear that inappropriate development should not be approved unless justified by very special circumstances”*

# **Three Rivers Local Planning Authority**

# **Brownfield**

# **CPRE Report 2025**



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## **CPRE State of Brownfield Report 2025**

**Based on information held in brownfield registers**

**Enough brownfield for 1.4m homes**

**30,000 hectares of readily available land**

**Brownfield has increased by 54% in the six years to 2024**

**Enfield**

**Brownfield first policy**

**Deliverability – GLA has 250,000 homes on brownfield with planning permission**

**Homes for young working people and families**

# **The future of the London Metropolitan Green Belt**

# London's Green Belt



- **Openness**
- **Urban sprawl**
- **Health & welfare**
- **Important economic value:**
  - **providing food, water, heat absorption, timber & minerals**
  - **carbon sequestration**
  - **recreational and aesthetic benefits**
  - **soil & nutrients to support food production**
  - **biodiversity & nature regeneration**
- **Accessibility - 6,150 miles of footpaths**
- **Important habitats**

# London's Green Belt



- Suffered from piecemeal planning and development
- Become a political football
- No long-term vision
- Needs an overall strategic plan
  - only strategic authority is the GLA
  - LGR affect
- Treated like a national park
- LGB authority with overall supervision of the GB

# **Recent Planning Appeal Decision**

**March 2026**

# **Planning appeal decision**



**Hemel Hempstead**

**Appeal against the decision of Dacorum Council**

**30 dwellings – 70 bed care home**

# Reasons for appeal dismissal



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- Council's housing figure 1.03 – being addressed in the LP
- Regarded as “moderate” in GB Review
- Green Belt site which stopped urban sprawl
  - Not judged grey belt
- Effect on the openness – “substantial harm to GB”
- Council had surplus spaces for elderly people
- Economic benefits mainly short term and modest in future
- Additional demands on health service provision
- Design

# **What can we all do?**



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**Delay**  
**Delay**  
**Delay**

# Questions?