

# Grey belt assessment for land promotion

## Part A – Is land grey belt?

**Q1. Is land within the Green Belt?**<sup>1</sup>  
(either Previously Developed Land or not)<sup>2</sup>

If **no** – cannot be grey belt

If **yes**

**Q2. Does the site “strongly contribute”**<sup>3</sup> **to Green Belt purposes:**  
a) “to check the unrestricted sprawl of large built-up areas”;  
b) “to prevent neighbouring towns merging into one another”; or,  
d) “to preserve the setting and special character of historic towns” (NPPF 143)?

If **yes** in relation to a); b) OR d) – cannot be grey belt

If **no**

**Q3. Does the land contain areas or assets of importance set out in NPPF footnote 7 (excluding Green Belt) which “would provide a strong reason for restricting [or refusing] development”?**

If **yes** – cannot be grey belt<sup>4</sup>

### If no – land meets definition of grey belt

This means that provided the “golden rules” are met (See Part C below):

- Development plans<sup>5</sup> should “give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations” (NPPF 148).
- For decision-taking certain developments could be regarded as “not inappropriate” within Green Belt (NPPF 155) (See Part B below) and any impacts on openness will not contribute to Green Belt harm (NPPF 153 and Footnote 55) – See Part B below.

## Part B – Should development be regarded as “not inappropriate”? (NPPF 155 and 156)

### Q4. Would the proposed development on grey belt land comply with ALL of the following:

- a) Development “would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan” (NPPF 155a);

The guidance states that “in reaching this judgement authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way”.

- b) “There is a demonstrable unmet need for the type of development proposed”<sup>6</sup>;
- c) Development “would be in a sustainable location with particular reference to NPPF paragraphs 110 (genuine choice of transport modes) and 115” (prioritising sustainable transport; safe access; good design; and transport impacts mitigated); and
- d) For proposals for 10 or more homes, the proposals comply with the “golden rules” (NPPF paragraph 156)  
– See Part C below

**If yes, requirement to give “substantial weight” to harm to the Green Belt including to its openness is set aside (NPPF 153 and Footnote 55)**

If it fails one or more of the above, a proposal is inappropriate in the Green Belt and permission should only be granted where very special circumstances have been demonstrated (NPPF 153).

## Part C: The “golden rules”

### Q5. If the proposal is for 10 homes or more does it meet the “golden rules”?

For proposals of 10 or more homes on grey belt, the “golden rules” will apply (NPPF 156)<sup>7</sup>. PPG guidance on viability [\[here\]](#) currently provides that “*site specific viability assessment should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing*”<sup>8</sup>.

To comply with the Golden Rules proposals should provide:

- a) Higher levels of affordable housing (reflecting NPPF paragraphs 67-68 and 157)<sup>9</sup>;
- b) “*Necessary improvements to local or national infrastructure*”; and
- c) “*New, or improvements to existing, green spaces that are accessible to the public*”.

**If yes to a), b) and c) – the development “should be given significant weight in favour of the grant of permission” (NPPF 158) and potentially benefits from the “tilted balance” (NPPF 11d ii)**

If no, it would be necessary to demonstrate that very special circumstances exist to justify a permission.

### Endnotes

- 1 Only land within the Green Belt can be grey belt
- 2 Same tests apply irrespective of whether PDL or not – but see also NPPF 154g
- 3 Analysis/evidence needed to demonstrate land does not make strong contribution to any of purpose a, b or d. New PPG (published February 2025) provides guidance on how a ‘strong contribution’ can be defined
- 4 NPPF glossary defines grey belt as land that ‘does not strongly contribute to any of purposes (a), (b), or (d)’ of Green Belt purposes set out in NPPF 143
- 5 Where exceptional circumstances have been demonstrated (NPPF 145 and 146), and the site is consistent with sustainable patterns of development
- 6 For housing NPPF defines this as the lack of a 5YHLS or where the Housing Delivery Tests result was below 75% of the housing requirement. No similar definition is provided for other forms of development
- 7 Unless the land was allocated in a plan that was adopted or benefits from a planning permission that was granted before 12 December 2024
- 8 Government has indicated it intends to review guidance on viability including to consider the application of the Golden Rules to “*large sites and Previously Developed Land*”
- 9 Either: a) the proportion required by a development plan that was adopted in line with NPPF 67&68; b) 15% above prevailing policy requirements (where they were adopted before 12 December 2024) capped at 50% (but see NPPF Footnote 60); or, c) where there is no prevailing policy requirement, 50%