

# GREYING THE GREENBELT

THE UNNECESSARY MAKING OF A GREY,  
UNPLEASANT LAND



Our Green Belts are at risk as never before.

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## Introduction

'Grey belt' was supposed to be 'ugly' land, remember? So, rather unusually, we begin the report with a quiz question...: Which one of the two pictures below is 'grey belt'?



**Answer:** Both of them could be

Can you spot a disused petrol station or derelict car park in the second picture?

More and more examples are emerging every day of countryside and farmland within England's green belts that developers are describing as 'grey belt' so that they can more easily gain planning permission.

When Sir Keir Starmer promised to prioritise "ugly, disused grey belt land" for housing, his images were clear: abandoned petrol stations, derelict car parks, forgotten scraps of urban wasteland. "It's brownfield first," said Starmer, disingenuously. "We're not going to build all over the countryside." But behind the soundbites lies a very different reality—one that this report lays bare.

The so-called 'grey belt' is not a ring of concrete and tarmac. It is not what Starmer said it would be. Instead, it is a policy sleight of hand that rebrands swathes of countryside, farmland, and village-edge green fields as fair game for development. Thousands of acres of land once better protected by Green Belt status are now vulnerable—not because they're derelict, but because they now tick the new bureaucratic boxes that spell their death sentence.

This is not targeted regeneration. It is open season. Planning inspectors are overturning local decisions and developers are being handed a blank cheque to build on land that, until recently, would have been deemed inappropriate. The promise of "consultation with local people" rings hollow when those same communities are being sidelined.

This report exposes the truth behind the grey belt spin. It shows how a policy dressed up in the language of sustainability is, in practice, fuelling car-dependent sprawl, undermining local democracy, and threatening the very landscapes that define our green and pleasant land.

Even as we write this, more and more examples of beautiful countryside and productive farmland that are being threatened with development under the new grey belt rules, are flooding the internet. The case studies that we set out here are only the tip of the iceberg. We barely scratch the surface. According to research, there are around 30,000 sites that could meet grey belt criteria, so the risk to our green spaces is huge<sup>1</sup>.

Let's be clear: this is not about petrol stations and car parks. It's about the future of our countryside.

The Government must stop this charade and, in the forthcoming consultation on the National Planning Policy Framework must do two things:

1. Reverse the grey belt rules with immediate effect to save our Green Belts.
2. Adopt a sequential test policy that mandates our greenfield last 'Homes for Everyone' approach

You can make your own voice heard by clicking here to email your MP today. [Homes for Everyone](#)

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<sup>1</sup> [Grey belt could deliver 3.4 million new homes, research shows - Property Industry Eye](#)

The 'grey belt' concept introduced by the government in 2024 was, purportedly, to target 'poor quality' and 'ugly'<sup>2</sup> land in the Green Belt for housing, to meet the 1.5m homes target.

**"We'll prioritise ugly, disused 'grey belt' land"**<sup>3</sup> Sir Keir Starmer

**'It's brownfield first. We're not going to build all over the countryside. That's nonsense. Of course nobody wants to do that.'**<sup>4</sup> Sir Keir Starmer

**"Sensible use" of the Green Belt; "in some places", "in consultation with local people".**<sup>5</sup> Sir Keir Starmer

**Disused petrol stations; abandoned car parks; low value scrubland.** Sir Keir Starmer

In a Labour Party video,<sup>6</sup> 'grey belt' is portrayed as brownfield, disused, poor quality, car parks, or wasteland.



Beauty is in the eye of the beholder – a site that meets the 'grey belt' criteria.

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<sup>2</sup> Labour sets out rules to boost homes with 'grey belt' development – Mortgage Finance Gazette

<sup>3</sup> Labour unveils plans for new housing on 'grey belt' - BBC News

<sup>4</sup> [https://x.com/Keir\\_Starmer/status/1781427210521391478](https://x.com/Keir_Starmer/status/1781427210521391478)

<sup>5</sup> Keir Starmer reiterates 'grey belt' approach to new homes - BBC News

<sup>6</sup> What is grey belt land and why does Keir Starmer want to build on it? □□

## Defining grey belt – it's not what they said it would be

This next section is a little technical but necessary, as 'grey belt' policy needs explaining. Skip past it if you just want to see examples of 'grey belt' that is not remotely grey.

### What is Green Belt?

Green Belt was established to limit the sprawl of large built-up areas and to stop towns merging.

To understand 'grey belt' land, firstly we need to know how Green Belt is defined in the National Planning Policy Framework (NPPF)<sup>7</sup>:

*"143. Green Belt 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; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

### How is 'grey belt' defined?

Next, we look at 'grey belt'

*"Grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143."*

Therefore, 'grey belt' can, in fact, be greenfield land, farmland, countryside in the Green Belt that does not:

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

Further support in the NPPF for sites that are not previously developed is in paragraph 148:

*"148. Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider 'grey belt' which is not previously developed [our emphasis], and **then other Green Belt locations.**"*

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<sup>7</sup> National Planning Policy Framework

## Open season for fields around Green Belt villages

What this means in practice is that green fields around a village in the Green Belt are firmly in the sights of developers. Village-edge countryside is also at risk of allocation in local plans under reviews of Green Belt required under government rules.

In a desperate bid to protect their Green Belt, some councils are rebranding villages as towns, or grouping villages together to form a large built-up area <sup>8</sup>.

Solihull Council has proposed reclassifying four villages as towns – Knowle, Dorridge, Bentley Heath and Balsall Common. Oxford City Council has proposed merging surrounding villages into a larger “Greater Oxford” unit to centralise planning decisions and protect Green Belt land. This approach is not a magic bullet, as developers are likely to challenge the definitions.

## Grey belt sites are often “inappropriate development”

Far from being development on old petrol stations and disused car parks, ‘grey belt’ sites are often greenfield land. Under the old rules, a great many of the sites would have been refused planning permission and certainly not included in a local plan.

With an arbitrary flick of a policy switch, the government has decided that building on green fields in the Green Belt is no longer inappropriate.

This can be seen in the wording of appeal decisions by planning inspectors, such as,

*“39. Prior to the publication of the 2024 Framework, it was common ground that the proposal would represent inappropriate development. However, paragraph 155 introduces the concept of grey belt land where development in the Green Belt may not be considered inappropriate.”<sup>9</sup>*

In another appeal<sup>10</sup>, the site had initially been deemed to be inappropriate development in the Green Belt and refused permission by the council. The site was described by the inspector, at appeal by the developer, as follows,

*“9. Fields would be largely covered by structures. In my judgement this is manifest encroachment into the countryside. The scale of the development would mean that the encroachment would be significant.”*

Yet both appeals were allowed due to ‘grey belt’ rules, and contrary to Starmer’s assertion that ‘grey belt’ sites would be in consultation with local people.

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<sup>8</sup> [Why councils are reclassifying villages as towns | Homebuilding](#)

<sup>9</sup> Appeal Decision APP/H2265/W/24/3347410. For a detailed look at some of the early grey belt appeals, see [Grey belt decision tracker: the growing appeal of grey belt | Marrons](#)

<sup>10</sup> APP/T3725/W/24/3347315

## But ‘grey belt’ is ‘sustainable’, right?

The NPPF states, in paragraph 155, that the development of homes in the Green Belt should not be regarded as inappropriate where:

- a) the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b) there is a demonstrable unmet need for the type of development proposed;*
- c) the development would be in a sustainable location; and*
- d) the development meets the ‘Golden Rules’.*

This is what the NPPF says about sustainability with relation to Green Belts:

- *“...when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework.” (148)*
- *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” (110)*
- *“a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location.” (115)*

However, the definition of what ‘sustainable’ means in the Green Belt is very loose. Here’s just one interpretation, from an officer’s report relating to a planning application in Sevenoaks<sup>11</sup>:

*“...supported by the Government’s Planning Practice Guidance which states that whether locations are sustainable should be determined in light of local context and site or development-specific considerations. In this regard, the site is considered to be in a relatively sustainable location. The site occupiers would be reliant on private vehicles to access services and facilities. However, those services and facilities may not, on a day-to-day basis, involve long journeys. Hartley, New Ash Green and South Darenth are all in fairly close proximity (approximately 10 minutes’ drive) where a number of services are available.”*

In this one case, car-dependency is considered sustainable. In others, for large developments, travel plans are required and Section 106 money can be sought for public and active transport.

However, the fact remains that there is no strict definition of sustainability, which at a very high level, can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs

In addition, there is no strategic planning for transport to support ‘grey belt’ developments. It’s pepper-potting (not familiar with that phrase), and will result in more ‘cow pat developments.’<sup>12</sup> This approach cannot be described as sustainable and is the opposite of what the government claims it seeks, which is to, “... replace the previous haphazard approach to Green Belt designation and release with a more strategic, targeted approach.”<sup>13</sup>

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<sup>11</sup> 24/02474/FUL

<sup>12</sup> [New “cowpat” housing developments are adding to traffic congestion and locking communities into car-dependency - Transport for New Homes](#)

<sup>13</sup> [Change the ‘grey belt’ definition in the National Planning Policy Framework - Petitions](#)

## Are the ‘Golden Rules’ worth the paper they’re written on?

Lastly, developments in the Green Belt must make the following contributions (‘Golden Rules’):

*“a. affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*

*b. necessary improvements to local or national infrastructure;*

*c. 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 onsite provision or through access to offsite spaces.”*

But what is to stop the developer obtaining planning permission on the basis of a ‘Golden Rules compliant’ application and then following the time-honoured approach of renegotiating the affordable housing quota or infrastructure contributions at a later date?

Who defines ‘necessary’ improvements to infrastructure?

And what a bitter pill for local people to swallow – they lose their local green space to development but new residents are provided with green space within the development. To add insult to injury, there is a possibility that Biodiversity Net Gain will be provided offsite too. For example, the Bristol Tree Forum found an average offsite distance of 80.1 km for Biodiversity Net Gain (BNG) habitat loss compensation, with some sites being over 100 km away <sup>14</sup>.

## The greying of our green and pleasant land

All in all, the many, well-known, benefits of Green Belts<sup>15</sup>, including human well-being, natural capital, food production, carbon sequestration, flood prevention – and preventing urban sprawl, of course – have been swept away in a decision to reclassify land to meet poorly thought out housing targets.<sup>16</sup> The result will be unchecked, car-dependent, urban sprawl into our much-loved countryside while doing very little to ease the housing crisis or the issue of ‘affordability’.

We set out below just some examples since the rules were changed of how countryside in the Green Belt is being lost to housing development.

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<sup>14</sup> [Biodiversity Metric – Bristol Tree Forum](#)

<sup>15</sup> [All you need to know about the Green Belt - CPRE](#)

<sup>16</sup> [More homes than households - who are we building for? | LinkedIn](#)

## Case studies - The greying of the Green Belt

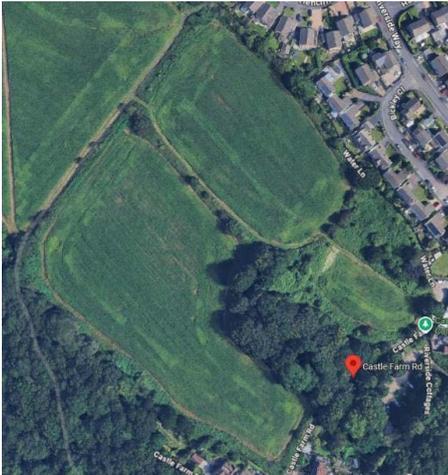
In the following pages, we set out a series of case studies. These are merely the tip of the iceberg. They demonstrate that 'grey belt' involves the best of England's green and pleasant land, turning it grey and unpleasant.

To give two examples of the local scale of the problem, in Hertfordshire alone, developers are arguing that more than 835 hectares of countryside is 'grey belt', according to CPRE Hertfordshire. That's just one county.

And Hertsmere Borough Council has seen a 63% increase in the total number of major Green Belt applications in 2025 for the same period in 2024. Of sixteen major Green Belt applications received by Hertsmere between December 2024 and September 2025, eleven cite grey belt justification.

**We have created a Grey Belt Tracker that allows you to submit information about a grey belt development proposal on Green Belt near you. The more we know about the picture nationally, the better. Click [here](#) to submit information.**

## 1. South Hanham, Gloucestershire



Images: Google

<p><b>What does it involve?</b></p>	<p>140 homes on greenfield land in the Green Belt. Previously rejected as ‘inappropriate development’.</p>
<p><b>What did the inspector say?</b></p>	<p>“26. Clearly, the development of the appeal site would run counter to the aim of safeguarding the countryside from encroachment. Currently the site comprises undeveloped agricultural land and has a rural character, and its development would undermine that aim.” But would not “undermine any strategic role” of the Green Belt.</p>
<p><b>Appeal decision</b></p>	<p>3357956<sup>17</sup></p>
<p><b>In the news</b></p>	<p>Concrete jungle fears:<sup>18</sup> “The local wildlife - including badgers, deer, foxes, buzzards, and bats would lose their hunting and foraging grounds and the green infrastructure corridor would become very narrow between the fields and the River Avon below. “The river, which is very popular with wild swimmers, kayakers and paddleboarders would become more polluted as increased run-off from the estate would travel downhill through the old quarries and mine workings picking up contaminants on the way... There will be no winners from this development.”</p>

<sup>17</sup> Reference: APP/P0119/W/24/3357956

<sup>18</sup> <https://www.bristolpost.co.uk/news/bristol-news/concrete-jungle-fears-over-bid-10019735>

## 2. Smallfield, Surrey



<b>What does it involve?</b>	270 homes next to a village in the Green Belt
<b>What did the inspector say?</b>	“major adverse effect on the landscape character of the site itself”
<b>Appeal decision</b>	3355743 Appeal Decision.pdf <sup>19</sup>
<b>In the news</b>	270 home plans approved in Surrey after inspector concludes a nearby 'town' is actually a village - Surrey Live <sup>20</sup>

<sup>19</sup> Reference: APP/M3645/W/24/3355743

<sup>20</sup> 270 home plans approved in Surrey after inspector concludes a nearby 'town' is actually a village - Surrey Live

### 3. Daws Heath, Essex



Image: Google

<b>What does it involve?</b>	173 homes (50% 'affordable') adjacent to the village of Daws Heath
<b>What did the inspector say?</b>	In a previous appeal, "In assessing a site on the edge of Thundersley in the gap between that settlement and Daws Heath, the Inspector in that appeal identified that there would be significant harm to the Green Belt purpose of preventing neighbouring towns merging into one another arising from an outline scheme for up to 58 dwellings. The Inspector in that appeal did however state that Daws Heath is a village rather than a town.
<b>Appeal decision</b>	APP/M1520/W/24/3351658 <sup>21</sup>

<sup>21</sup> Reference: [APP/M1520/W/24/3351658](#)

## 4. Surrey Heath



Image: Google

<b>What does it involve?</b>	135 homes, including a minimum 50% affordable homes
<b>What did the inspector say?</b>	“The site extends to around 4.5 hectares and is formed of a single agricultural field adjoining Grove End”
<b>Appeal decision</b>	Reference: APP/D3640/W/24/3347530 <sup>22</sup>
<b>In the news</b>	'Starmer doesn't give a s*** about us!' Locals furious over plans for 135 newbuild homes on Green Belt land after it was 'reclassified' by Labour   Daily Mail Online <sup>23</sup>

<sup>22</sup> Reference: APP/D3640/W/24/3347530

<sup>23</sup> 'Starmer doesnt give a s\*\*\* about us!' Locals furious over plans for 135 newbuild homes on Green Belt land after it was 'reclassified' by Labour | Daily Mail Online

## 5. Great Barr, Walsall



*Image: Google*

<b>What does it involve?</b>	Battery storage Land off Chapel Lane
<b>What did the inspector say?</b>	<p>“The site is not previously developed land”</p> <p>“The site and other substantial tracts of land in the wider area are used for the grazing of horses.”</p>
<b>Appeal decision</b>	Reference: APP/V4630/W/24/3347424 <sup>24</sup>
<b>In the news</b>	Great Barr battery storage site plans outrage campaigners - BBC News <sup>25</sup>

<sup>24</sup> Reference: APP/V4630/W/24/3347424

<sup>25</sup> Great Barr battery storage site plans outrage campaigners - BBC News

## 6. Wrotham, Kent



Image: Google

<p><b>What does it involve?</b></p>	<p>Truck stop Construction of a secure 24-hour truck stop facility for up to 200 HGVs incorporating fuel station; amenity building of up to 1100 sqm; creation of a new access to A20 via roundabout.</p>
<p><b>What did the inspector say?</b></p>	<p>“There are views from the roadside over the gently undulating countryside to the south and west of the site”</p> <p>““39. Prior to the publication of the 2024 Framework, it was common ground that the proposal would represent inappropriate development.”</p> <p>But “the site does not contribute strongly to purpose (a) because the nearest settlement is a village”</p>
<p><b>Appeal decision</b></p>	<p>Reference: APP/H2265/W/24/3347410<sup>26</sup></p>
<p><b>In the news</b></p>	<p>Controversial 24-hour M26 Kent lorry park approved at appeal by Government inspector - Kent Live<sup>27</sup></p>

<sup>26</sup> Reference: APP/H2265/W/24/3347410

<sup>27</sup> Controversial 24-hour M26 Kent lorry park approved at appeal by Government inspector - Kent Live

## 7. Kenilworth, Warwick & Solihull



*Images: Google*

<p><b>What does it involve?</b></p>	<p>Solar &amp; battery Ground mounted Solar Photovoltaics (PV) with co-located Battery Energy Storage System (BESS) 47ha + 3.4ha Land to the south of Birmingham Road, Kenilworth. Warwick District Council and Solihull Metropolitan Borough</p>
<p><b>What did the inspector say?</b></p>	<p>Initially refused as inappropriate development in the Green Belt “9. Fields would be largely covered by structures. In my judgement this is manifest encroachment into the countryside. The scale of the development would mean that the encroachment would be significant “</p>
<p><b>Appeal decision</b></p>	<p>Reference: APP/T3725/W/24/3347315<sup>28</sup></p>
<p><b>In the news</b></p>	<p>Plans to install solar farm in Kenilworth approved - BBC News<sup>29</sup></p>

<sup>28</sup> Reference: APP/T3725/W/24/3347315

<sup>29</sup> Plans to install solar farm in Kenilworth approved - BBC News

## 8. Grey Belt Allocations in a Local Plan: Sevenoaks

Sevenoaks District Council has published its latest Regulation 18 Local Plan, the third iteration following earlier withdrawals. The District is one of the most constrained in England, with 93% of its land designated as Green Belt and 60% falling within a National Landscape (formerly AONB). The updated plan introduces significant proposed housing allocations on so-called “grey belt” sites—greenfield land within the Green Belt that is now considered to make only a limited contribution to Green Belt purposes.

The Council’s evidence base includes a revised Green Belt assessment which applies the Government’s updated definition of “grey belt.” This identifies land that does not strongly contribute to three of the five Green Belt purposes: preventing urban sprawl, stopping neighbouring towns from merging, and preserving the setting of historic towns.

Given Sevenoaks’ dispersed settlement pattern of villages and hamlets, much of its Green Belt is now classified as grey belt, since few areas directly abut large urban settlements. Only eight assessment parcels remain outside the grey belt category, located primarily at the edge of Greater London and between Swanley and Hextable.

Under the new framework, grey belt land may only be considered for allocation if it is in a “sustainable location,” with reference to public transport accessibility as outlined in paragraph 148 of the NPPF. The Council has updated its settlement hierarchy to assess facilities and transport provision across towns and villages. Growth will be directed first to Sevenoaks town, followed by Swanley, Edenbridge and Westerham. Service settlements and other villages with train stations outside the National Landscape are expected to absorb more modest levels of development.

The impact of this policy shift is evident in the latest site allocations. Analysis indicates that 52 greenfield Green Belt sites are now proposed, compared to just 11 in the previous draft—an increase of 41 sites. Collectively, these could deliver at least 5,137 new homes, though some sites do not yet have specified capacities. This marks a major expansion of potential development into previously protected land.

The reclassification of land as grey belt is already influencing planning decisions. A notable case is application 24/02474/FUL at Canada Farm Road, approved in March 2025. The officer’s report concluded that the site did not contribute strongly to Green Belt purposes (a), (b) or (d), and therefore qualified as grey belt under the revised NPPF. Despite reliance on private cars and limited local services, the site was deemed to be in a “relatively sustainable location.” This interpretation raises concerns that large parts of Sevenoaks District could be considered sustainable under the new policy, potentially opening extensive rural areas to development.

Alongside these housing pressures, Sevenoaks has also seen approvals for large-scale renewable energy projects, including the Chimmens solar farm on 245 acres, of which 92% is best and most versatile farmland. Together with several other proposed solar schemes, these decisions illustrate the mounting development pressures on constrained landscapes.

The forthcoming Regulation 18 consultation will therefore be critical. It will test both the robustness of the Council’s grey belt evidence and the extent to which “sustainable location” criteria provide meaningful protection in a district where almost all land now falls within the redefined grey belt category.

## 9. Developers attempting to add Green Belt sites to local plan, Norton Canes, South Staffordshire



They have a grey future (photo credit Daniel Scragg)

Norton Canes, in South Staffordshire, is described as a mining village because of its heritage. Over recent years its population has grown due to extensive new builds, which have caused the erosion of remaining green belt.

Through the recent planning process, the local council identified enough brownfield sites to accommodate new housing targets. The most recent local plan also advised that two Green Belt sites (good quality arable land) must retain this status, and using this should be considered as a very last resort. There were three reasons for this decisions:

- firstly, environmental conservation,
- secondly to combat severe future infrastructure pressure,
- thirdly to prevent the merging of 3 distinct local areas, including Norton Canes village.

However, the council is now under pressure to release more green belt.

Bloor Homes is challenging the council's five-year supply situation in order to argue for the allocation of greenfield sites. Bloor is attacking the local plan, saying allocated brownfield sites are not suitable, and is demanding that even more Green Belt (farmland) should be released instead. Developers have also submitted speculative applications on Green Belt.

Locals argue that the proposed Green Belt sites are not sustainable or suitable because:

- Schools and doctors are full. The village schools are already short of 60 places, and children are having to get buses and taxis to neighbouring towns and villages. That is without adding these extra potential 450 houses. The new, proposed, school, is not within walking distance.
- It will merge towns and villages.
- Arable Green Belt land will be taken out of farming.

The developments will be car-dependent as schools and workplaces are not within walking or cycling distance.

## We don't need to destroy the Green Belt

It's sheer lunacy to build over the Green Belt when we do not need to.

We can provide 3.7million homes by repurposing empty homes, commercial buildings and public buildings, by insisting on brownfield first, and by making housebuilders build out their existing planning permissions.

The government should reverse the 'grey belt' rules. Instead of encouraging building on green spaces, including the Green Belt, the government should follow the '[Homes for Everyone](#)' approach, that thousands of people have sent to their MPs.

Proposals to build on Green Belt countryside are negligent to nature and future generations. Any so-called 'grey belt' should be regreened, not built upon. We need more green spaces, not less.

### How to meet housing need without targeting green spaces



**That's over three million homes without concreting any more countryside**

Add your voice to the call to:

3. Reverse the grey belt rules with immediate effect to save our Green Belt land.
4. Adopt a sequential test policy that mandates our greenfield last 'Homes for Everyone' approach

Click here to email your MP today: [Homes for Everyone](#)