

MAYOR OF LONDON

**LONDON PLAN GREEN
BELT STRATEGIC
APPROACH**

London Plan evidence paper

July 2026

London Plan Green Belt strategic approach report

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Greater London Authority

July 2026

Published by:
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Executive Summary

- 1.1 This paper sets out the rationale, evidence and proposed approach underpinning the draft London Plan's response to Green Belt release and management. It explains how national policy changes, particularly those introduced through the 2024 National Planning Policy Framework (NPPF), have altered the strategic planning context and require London to consider whether exceptional circumstances exist to justify selective Green Belt release. It provides transparency on the evidence and approach used to develop the Plan's response to this issue through its spatial strategy, and should be read alongside the wider London Plan evidence base, including the Strategic Housing Land Availability Assessment (SHLAA), Green Belt Assessment, Industrial Evidence Paper, Economic Uses Supply and Demand Study, and other supporting studies.
- 1.2 Green Belt policy remains focused on preventing urban sprawl through the permanent protection of open land. However, recent changes to national policy have introduced a stronger expectation that, where development needs cannot be met within existing urban areas, authorities should explore Green Belt release as part of plan-making. At the same time, the NPPF introduces the concept of 'grey belt' land and a sequential approach that prioritises the release of lower-performing Green Belt land where sustainable locations can be identified. Importantly, national policy remains clear that sustainable patterns of development, particularly those supported by high-quality transport infrastructure and connectivity, should be the overriding consideration when identifying locations for growth.

The case for strategic 'Exceptional Circumstances' (Chapter 2)

- 1.3 The evidence demonstrates that London cannot accommodate all of its identified development needs within its existing urban area, despite extensive efforts to optimise brownfield land supply. The London Plan's SHLAA has thoroughly assessed and exhausted reasonable and feasible opportunities to increase housing capacity through careful consideration of the existing supply of large sites together with additional (and challenging) measures such as applying higher densities, increased assumptions from small sites, the release of some industrial land for housing and other policy measures.

Even after these interventions, London's brownfield capacity remains significantly below assessed housing need.

1.4 The evidence identifies three development types for which unmet need is strategically significant and requires a strategic response within the London Plan in terms of Green Belt management:

- Housing, where brownfield capacity falls substantially short of identified need.
- Industrial, storage and distribution uses, where demand for land significantly exceeds available supply despite extensive optimisation measures.
- Data centres, where rapid sector growth and supportive national policy are generating increasing pressure for new development capacity.

1.5 Alternative options were tested and exhausted before Green Belt release was considered. This included further optimisation of brownfield supply, assessment of Metropolitan Open Land (MOL) potential, and consideration of whether seeking to accommodate part of London's unmet need across neighbouring authorities was likely to be justifiable, feasible and effective. The evidence indicates that MOL offers only limited and fragmented opportunities. It also finds that neighbouring authorities generally face similar land constraints and would be unable to absorb London's shortfalls. Furthermore, dispersing growth outside London would be unlikely to represent a sustainable pattern of development and could place additional pressure on transport infrastructure.

1.6 The evidence also highlights the importance of addressing these unmet needs as far as possible, and the consequences of not doing so. In the case of housing, this includes worsening affordability pressures, overcrowding and homelessness. Across all sectors, more constrained land supply limits economic growth, reduces investment and restricts opportunities to deliver infrastructure, employment and public benefits.

1.7 Taken together, the evidence demonstrates that exceptional circumstances exist and provides a strong strategic justification for considering selective, targeted Green Belt release.

Sustainable development and the role of grey belt (Chapter 3)

1.8 The paper concludes that the identification of sustainable locations must be the primary factor in determining where Green Belt release should occur. While grey belt status is an

important material consideration, national policy, guidance and recent appeal decisions all make clear that it should not be used as a proxy for land suitability.

- 1.9 To support plan-making, the GLA commissioned the first consistent London-wide Green Belt Assessment. This study assessed more than 1,000 Green Belt parcels and provides a robust understanding of the distribution of potential grey belt land. The findings demonstrate that potential grey belt is unevenly distributed and often highly fragmented. Many areas identified as potential grey belt do not align with locations that have strong transport connectivity or the ability to support strategic-scale development.
- 1.10 The assessment also highlights the limitations of relying solely on Green Belt performance. The grey belt definition considers only a limited range of Green Belt purposes and does not account for other environmental, ecological, recreational, cultural or infrastructure considerations that may affect suitability. The evidence therefore supports an approach that balances Green Belt performance with wider sustainability objectives rather than prioritising grey belt release irrespective of location.

Identification of Sustainable Growth Locations (Chapter 4)

- 1.11 In response to these findings, the draft London Plan adopts a sustainable transport -led approach to identifying broad locations for growth (BLGs).

Residential

- 1.12 For housing, sustainable locations are defined primarily by access to high-quality public transport connections. Detailed analysis of all the stations within and adjacent to London's Green Belt identified land in walking distance of those with suitable connections to employment destinations capable of supporting medium-density, car-light development.
- 1.13 Following the exclusion of environmental and physical constraints, a strategic assessment of development capacity was undertaken. In the context of Good Growth objectives, evidence from comparable developments in London and elsewhere and other analysis (e.g. transport / land use), it is clear that compact, mid-rise neighbourhoods provide the most effective balance between housing delivery, viability, environmental performance and placemaking quality. These forms of development can support family housing, public transport use and landscape-led master planning while avoiding inefficient, car-

dependent suburban expansion. This accords with the concepts of compact, landscape-led urbanism deemed necessary to balance strategic releases with wider Good Growth objectives and strategic impacts.

- 1.14 The assessment was further refined into BLGs with a critical mass of capacity that would ensure managed Green Belt release was carefully targeted, and resulting populations would be of sufficient scale to support successful places.
- 1.15 The methodology also considered future transport investment. Potential new stations, station upgrades and express bus connections were assessed to understand how connectivity could improve over time and support future development beyond the initial Plan period.
- 1.16 This process resulted in the identification of ten residential-led BLGs, providing a strategic response to the significant shortfall in residential needs in the evidence base. While the additional capacity provided by these BLGs would not be sufficient to fully balance London's anticipated unmet housing needs, it was the maximum that was considered reasonable and plausible within the 10-year period. This accounted for compatibility with the Plan's Good Growth objectives, and careful management of strategic impacts and infrastructure capacity.
- 1.17 Given remaining need, a further eight to nine potential future candidate BLGs were also identified, together with additional land at four of the first phase BLGs where land may be safeguarded for future potential capacity, supporting delivery beyond the initial ten-year period. This is however contingent on the unlocking of this land through longer term transport investment.

Industrial Storage and Distribution

- 1.18 For industrial storage and distribution uses, sustainable locations were defined by proximity to suitable sections of the Strategic Road Network (SRN). The evidence demonstrates that these uses require direct access to strategic freight infrastructure and can experience significant operational constraints and create significant adverse environmental impacts if poorly located.
- 1.19 A proactive search was undertaken to identify suitable Green Belt land based on freight suitable road and junction access, environmental constraints, site characteristics and operational requirements. This supply was then refined into strategic clusters and

assessed against transport, environmental and market criteria. The process resulted in the identification of nine industrial BLGs distributed across London's outer Property Market Areas, providing a strategic response to the identified shortfall in industrial land supply. A further two potential future candidate BLGs were also identified should additional capacity be needed long term to service London's future needs, beyond the plan period.

Data Centres

- 1.20 A different approach is proposed for data centres. While evidence points to substantial future growth in the sector, development suitability is driven primarily by access to utilities infrastructure with sufficient capacity rather than transport connectivity. The draft London Plan therefore adopts a criteria-based policy response rather than identifying specific BLGs for data centre development. This also reflects that the precise quantum of unmet need has not been established.
- 1.21 The strategy prioritises utility capacity, opportunities for heat recovery, infrastructure coordination and the protection of land best suited for housing and industrial development. It also recognises opportunities for data centres within suitable Green Belt locations – particularly grey belt sites – where this supports wider strategic objectives.

Green Belt Performance with the identified Broad Locations for Growth

- 1.22 The BLGs identified through the assessment were selected primarily based on sustainability and connectivity rather than Green Belt performance. As a result, some locations contain land that performs relatively strongly against Green Belt purposes.
- 1.23 To understand these implications, additional evidence was commissioned to assess potential risks of fundamentally undermining Green Belt function. The findings show that the identified BLGs contain a mix of lower- and higher-performing Green Belt land. Approximately one quarter of the gross land supply identified within BLGs overlaps with potential grey belt, while only a small proportion was assessed as presenting a likely risk of fundamental impacts to the remaining Green Belt within a borough. No fundamental impacts were assessed to be likely at the London-wide level.
- 1.24 The evidence also shows that many potential impacts can be mitigated through detailed local planning, landscape-led master planning, boundary refinement and the retention of strategic green infrastructure. Significant gross-to-net discounts have already been

applied within the capacity modelling to allow flexibility for these future design responses and to ensure Green Belt enhancement forms part of the overall approach.

Policy integration (Chapter 5)

- 1.25 Based on the outputs of the strategic evidence and approach set out, the draft London Plan identifies broad locations for growth (BLGs) and apportions development need relating to future Green Belt release. However, the evidence concludes that additional policy measures are also required to ensure that release is directed only towards the most sustainable locations and that scarce, well-connected land is used efficiently. To achieve this, draft Policy PV7 (Sustainable Development and Enhancement of the Green Belt) establishes clear criteria linking future release to specific rail stations and Strategic Road Network junctions identified through the evidence base.
- 1.26 The policy also includes interim requirements relating to density, parking and green infrastructure. These are intended to ensure that development delivered ahead of detailed local planning frameworks supports compact, car-light and landscape-led forms of growth, while also securing new green infrastructure and wider Green Belt enhancement. Density and parking standards are linked to accessibility, helping to maximise the efficient use of land and support sustainable travel patterns.
- 1.27 The chapter also introduces specific criteria for high-quality express bus services, recognising that only a limited number of locations may be capable of supporting additional growth through enhanced public transport connectivity. Together, these measures provide the implementation framework required to deliver the London Plan's targeted, sustainable and infrastructure-led approach to selective Green Belt release.

Conclusion

- 1.28 The evidence demonstrates that London faces substantial unmet needs for housing, industrial land and data centre development that cannot be accommodated through brownfield land alone. Alternative options have been comprehensively assessed and exhausted, and reliance on neighbouring authorities would neither be realistic nor consistent with sustainable development objectives. Exceptional circumstances therefore

exist for the draft London Plan to establish a strategic framework for selective Green Belt release.

- 1.29 The paper concludes that Green Belt release should be focused on locations that support sustainable patterns of development, maximise the use of existing and planned infrastructure, and facilitate landscape-led growth. The BLGs identified through the assessment provide a strategically coherent and realistic basis for meeting part of London's unmet development needs while protecting the overall integrity and strategic function of the Green Belt. Detailed Green Belt reviews, site allocations and planning decisions will remain matters for Local Plans, but the evidence demonstrates that the proposed approach represents a sound, justified and sustainable long-term strategy for London.

1 Context and need

Purpose of this paper

- 1.1 The purpose of this paper is to outline the rationale, objectives, and approach of the draft London Plan in relation to the selective release of Green Belt land. It forms part of the London Plan evidence base, supporting transparency and informing public consultation and the subsequent Examination in Public. This paper should be read alongside the wider evidence base rather than in isolation. It summarises key findings from relevant sources (including the SHLAA, Economic Supply and Demand Study, and Green Belt Assessment reports) only insofar as they relate to decisions on Green Belt release. It does not attempt to present a comprehensive account of London's overall development needs.
- 1.2 The document sets out the working approach underpinning the consultation version of the draft London Plan (July 2026). It may be revised following public consultation to reflect any changes made prior to the formal Examination in Public (expected in 2027). Throughout this paper, rounding has been applied to figures associated with anticipated delivery and capacity rates.

National Green Belt policy

Origins and objectives of Green Belt policy

- 1.3 Since its inception in the 1930s, Green Belt policies have shaped how cities accommodate growth in England. There are now 15 designated Green Belts, covering around 13 per cent of England's land area¹. While the policy framework has evolved over time, its primary purpose remains urban containment at a strategic, city-wide scale.
- 1.4 The current aims, purposes and management of Green Belt land are set out in the National Planning Policy Framework (NPPF). Paragraph 142 states that "the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics are openness and permanence". This is elaborated in NPPF paragraph 143, which states that Green Belts serve five purposes, as set out below:
 - 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

¹ Claire Stafford, Royal Town Planning Institute, 2024 ([online](#))

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 1.5 A prevailing feature of Green Belt policy since its first introduction are the strong protections that a designation bestows upon the land. The NPPF (Dec 2024) maintains that, aside from specific forms of ‘appropriate’ development, Green Belt land should be protected from inappropriate development. Proposals should be refused unless ‘very special circumstances’ clearly outweigh the harm. Similarly, once established, Green Belt boundaries should only be altered in ‘exceptional circumstances’. Green Belt designation is intended solely to protect land that fulfils Green Belt aims and purposes at a strategic level. It is just one of several land-use designations that may apply to the same land, where it also holds ecological, environmental, historic, cultural or amenity value. As such, Green Belt land often overlaps with other designations, reflecting its multiple functions. In some cases, however, land is designated solely for its contribution to Green Belt purposes.
- 1.6 Decisions relating to Green Belt designations and boundary changes are within the context of the Green Belt aims, purposes and policy framework set out in the NPPF, and this paper focuses on those matters. However, such decisions should not be taken in isolation. A range of other planning considerations may be relevant where changes are being considered and formally proposed. For example, land that performs weakly against Green Belt purposes (including ‘grey belt’) may still be unsuitable for development due to other constraints, such as its role as public open space or its ecological value. Full consideration against all applicable policies and material considerations is always required where an application for development within the Green Belt is proposed.

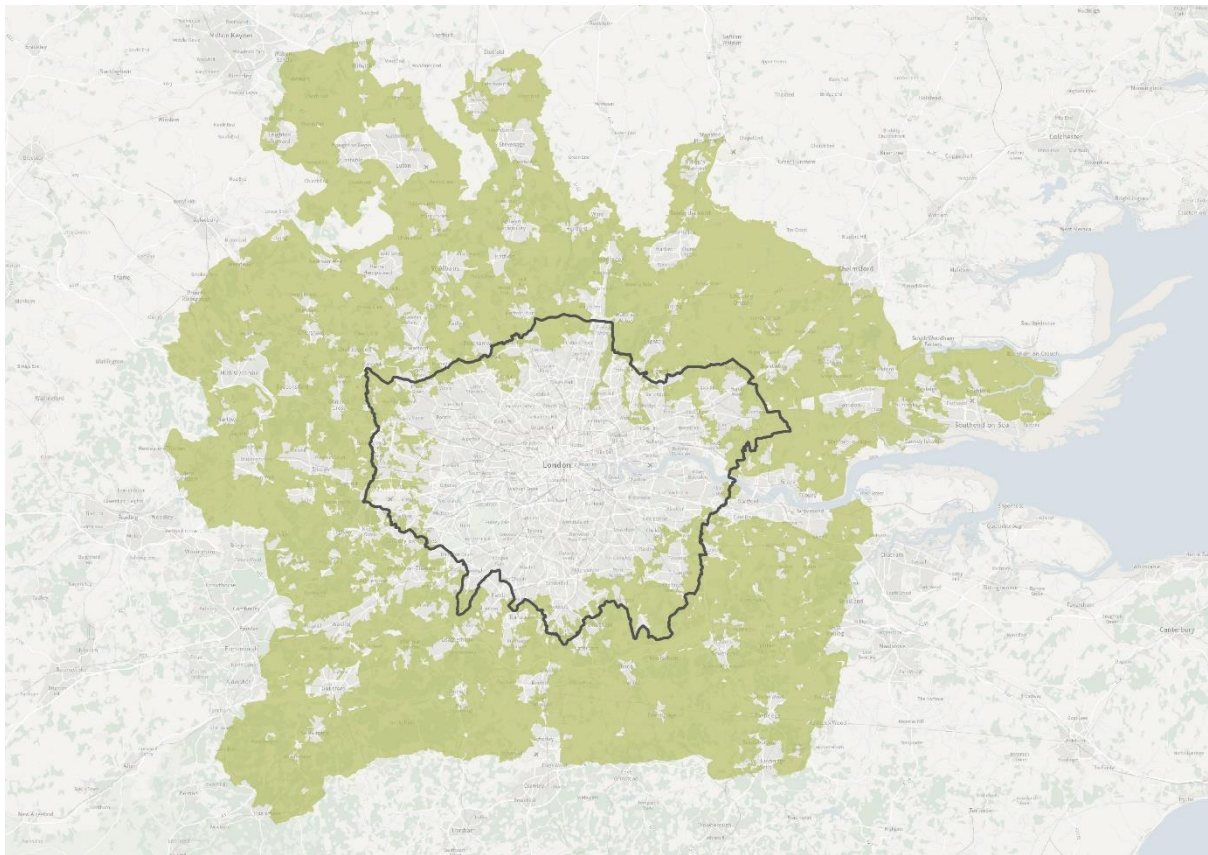
London’s metropolitan Green Belt & Green Belt within Greater London

- 1.7 London’s Green Belt is England’s largest, extending outwards from the edge of Greater London’s urban extent to cover a significant portion of east and southeast England. The totality of this area is referred to as the wider ‘London metropolitan Green Belt’. As set out in the Mayor’s London Green Belt assessment report, the metropolitan Green Belt covers over five hundred thousand hectares (ha), accounting for roughly a third of all Green Belt land in England, across 68 local authorities in Greater London, the East and Southeast of England. Within Greater London 18 boroughs contain Green Belt land,

covering over 34,750ha (roughly 7%) of the metropolitan Green Belt, but over 20% of the total area of Greater London.

- 1.8 The figure below illustrates the extent of London metropolitan Green Belt across the wider southeast of England, and the portion of which falls within the boundary of Greater London.

Figure: 1 - Extent of wider London metropolitan Green Belt



- 1.9 Clearly, the Mayor's powers and responsibilities only relate to land within Greater London, and the London Plan does not form part of the development plan outside of this boundary. As such, all discussion within this paper and the London Plan pertains to Green Belt land within Greater London only. However, opportunities for cross boundary collaboration or alignment are discussed in chapters 2 and 4.

Green Belt management responsibility and national policy framework

1.10 Local Planning Authorities (LPAs) designate Green Belt land through Local Plans and are responsible for reviewing boundaries to release or extend coverage. Such decisions must meet the tests set out in the NPPF and align with the Spatial Development Strategy (SDS) for the area — within Greater London, the London Plan. While an SDS does not amend Green Belt boundaries directly or allocate land for development, it establishes a long-term spatial strategy and pattern of development, and whether exceptional circumstances for Green Belt release exist at a strategic level. It may also indicate broad locations where Green Belt boundaries should be reviewed and amended by LPAs to accommodate the growth within its spatial strategy. The respective roles of the Mayor and boroughs are discussed further later in this chapter.

1.11 As noted above, the NPPF provides the framework for managing Green Belt land in England. The current version, published in December 2024, applies to the preparation of the London Plan. The government has consulted on a revised draft (December 2025), but it carries limited weight in plan-making and decision-making until released in final form.

1.12 The December 2024 NPPF includes several policy changes, some representing a significant shift from previous iterations. Of particular relevance to this paper are changes introduced to Green Belt policy, including:

- Adjustment to the ‘exceptional circumstances’ test.
- Introduction of grey belt definition and policies.
- Adjustments to the ‘very special circumstance’ test, and a widening of the definition of ‘appropriate development’.
- Introduction of ‘golden rules’ for Green Belt residential developments.
- Increased focus upon sustainable development, particularly in terms of transport and locations.

1.13 To support these changes, National Planning Practice Guidance (NPPG) relating to Green Belt assessments and grey belt was also published in February 2025. In addition, the December 2025 consultation draft NPPF included further changes to Green Belt policies which are also relevant, including:

- Green Belt train stations and ‘appropriate development’.
- Removal of foot note 7 in connection with grey belt.

- 1.14 The following sections provide a brief summary of the changes and implications of the most pertinent points listed above. The remaining chapters 2 – 6 then set out how the Mayor has responded to these changes in the context of London’s particular growth challenges and opportunities, via the draft London Plan.

NPPF – Exceptional circumstances

- 1.15 ‘Exceptional circumstances’ refers to a long-standing test within national policy which seeks to limit changes to established Green Belt boundaries through Local Plan reviews. This applies to both additional as well as releases of Green Belt designations. The requirements in terms of changes to existing Green Belt areas are set out below:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans” (p.145 NPPF).

- 1.16 In the context of an SDS, the London Plan’s role is to determine at a strategic level whether future boundary amendments are required by boroughs in their local plans (or other means of making non-strategic policy such as supplementary plans) over the plan period in order to help meet needs. The London Plan is expected to set out broad locations for growth and, where these are in the Green Belt, this indicates where boundary reviews and amendments will be necessary to conform with its spatial strategy. While this exceptional circumstance test itself remains broadly unchanged from previous iterations, the following paragraph introduces adjustments to how this should be applied:

“Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally

undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan” (p.146 NPPF) [emphasis added].

- 1.17 These changes to national policy have significant implications for London and the new London Plan. Although the following paragraph sets out a need for the strategic authority to demonstrate that “it has examined fully all other reasonable options for meeting its identified need for development” (p.147 NPPF), this introduces, for the first time, an explicit expectation that Green Belt release should be considered where development needs cannot be met within the existing urban area. The London Plan must therefore assess whether such circumstances arise across Greater London over the 20-year plan period (noting that housing targets only apply to the first 10 years), by establishing the capital’s development needs and a spatial distribution for growth to accommodate these needs. Chapter 2 provides further detail on this test.

NPPF – Grey belt

- 1.18 Another major change brought into force by the December 2024 NPPF was the introduction of the concept of grey belt. Grey belt is defined as follows:

“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. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development” (Glossary NPPF).

- 1.19 The three purposes referenced are: (A) checking unrestricted sprawl; (B) preventing neighbouring towns from merging; and (D) preserving the setting and special character of historic towns. Green Belt land that performs weakly against these purposes may fall within the policy definition of grey belt. Unlike Green Belt, grey belt is not a formal designation; it is derived from assessments of Green Belt performance, either through formal studies or supporting evidence for decision-making. While, as noted in paragraph 1.7, Green Belt status is distinct from other land-use designations, the exemptions set out

in NPPF footnote 7 may prevent land from being classified as grey belt². These are discussed further in later sections on the draft NPPF and Green Belt assessment.

- 1.20 The NPPF also introduced various new policy provisions which apply where the grey belt definition is met. In relation to plan-making, this includes the following:

“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, and then other Green Belt locations. However, 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 [relating to promoting sustainable transport]”. (p.148 NPPF).

- 1.21 This establishes a general presumption that, where Green Belt release is required (i.e. exceptional circumstances exist), lower-performing land (‘grey belt’) should be prioritised. **However, this is subject to the overarching requirement to promote sustainable patterns of development.** The balance between these considerations in the London context is explored further in Chapter 3.
- 1.22 New policies relevant to decision-making have also been introduced for grey belt land. These include an expansion to the definition of ‘appropriate development’ in the Green Belt to include schemes on grey belt land, subject to additional criteria (paragraph 155). Proposals meeting the criteria for ‘appropriate development’ are not subject to the ‘very special circumstances’ test set out in paragraph 153.

NPPF – Golden Rules

- 1.23 In the context of a framework which necessitates Green Belt release, the NPPF also introduced a set of new expectations from developments involving major housing on Green Belt land. These ‘golden rules’ necessitate that it should deliver:

² Note – the draft NPPF proposes the removal of footnote 7 and applicable tests from this section.

“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; and

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” (p.156 NPPF).

- 1.24 In relation to affordable housing, the following paragraph goes on to confirm that prior to the updating of Local Plans in response to the new framework, contributions should be set at 15 per cent above existing thresholds, up to a cap of 50 per cent. In London this would mean that all major residential schemes within the Green Belt are expected to deliver at least 50 per cent affordable housing to meet the requirements of 156(a). Further discussion in relation to the application, extent and sufficiency of these golden rules is set out in chapters 4 and 5.

Draft NPPF – consultation changes

- 1.25 The December 2025 consultation draft NPPF retains the major Green Belt policy changes outlined above. It also proposed further adjustments relevant to this paper, although these currently carry limited weight.
- 1.26 The draft introduces a new Annex E on Green Belt assessments and their role in plan-making. While much of this guidance previously appeared in the NPPG, its inclusion in the NPPF, if retained in the final version, strengthens its status. It places even greater emphasis on sustainable development patterns, particularly in relation to transport. It introduces an effective presumption in favour of development outside settlements where sites are within walking distance of train stations meeting minimum service thresholds (policy S5(h)). This is reflected in proposed Green Belt policies, which further expand the definition of ‘appropriate development’ to include housing or mixed-use schemes in such locations, subject to additional criteria (policy GB7(h)). A similar approach is also applied in the new policy on density (policy L3). The draft also proposes removing reference to ‘footnote 7’ designations from the grey belt definition. This would further separate the

identification and application of grey belt policy from other land-use designations. The implications for London are considered further in the section on Green Belt assessment.

- 1.27 The draft London Plan has been prepared against the current NPPF, while being cognisant of the draft NPPF. Subject to the final version, and any changes which may be included, this could require updates to the Plan post consultation. However, as discussed in Chapter 3, the Mayor's approach is considered broadly consistent with the direction of the changes proposed in the consultation version of the NPPF.

Role of the London Plan

Purpose and objectives of the SDS

- 1.28 As outlined above, the next London Plan, as the Spatial Development Strategy (SDS) for Greater London, has specific responsibilities for managing London's Green Belt as part of its growth strategy for the next 20 years. In setting the strategic pattern of growth, the Plan must assess whether exceptional circumstances exist to justify Green Belt release and, in that context, establish the principle of Green Belt release and a clear framework for how and where boundaries should be reviewed and amended locally. In doing so, the Plan is expected to consider the potential role of 'grey belt', although this is at the strategic scale (see Green Belt assessment section). The spatial strategy must be rooted in the Plan's Good Growth objectives and be consistent with the NPPF and the Mayor's legal duties, including those under the Greater London Authority Act 1999.
- 1.29 As an SDS, the London Plan cannot allocate land or amend Green Belt boundaries but is expected to set out a clear, long-term strategy for Green Belt management. By apportioning development need across boroughs and identifying other important opportunity (eg. environmental) it directs growth to the most sustainable locations and sets out the requisite long-term strategy for growth and change, including in the Green Belt. Once published, this strategy will carry substantial weight in development management and plan-making. Subsequent Local Plans and planning documents must be in general conformity with it.

1.30 Under planning law, planning decisions must be made in accordance with the development plan unless material considerations indicate otherwise³. Once adopted, the London Plan — including its policies, key diagrams and spatial strategy — will therefore be a significant material consideration in decisions affecting Green Belt land and development proposals will be expected to align with this strategy. The draft plan will gather increasing weight as it progresses through the examination process. However, proposals must still be assessed on their merits against the plan as a whole, and no single policy is fully determinative.

Towards a new London Plan consultation feedback and a vision for sustainable development in London's Green Belt

- 1.31 Between May and June 2025, the Mayor consulted on the document 'Towards a new London Plan', which set out ideas for growth in London to be considered for the next London Plan. It looked at how we could respond to some of the challenges the city faces if it is to grow and thrive.
- 1.32 In response to London's strategic objectives, emerging strategic issues, prior engagement insights as well as the aforementioned changes to national policy, this document set out various policy propositions including in relation to London's Green Belt. These conveyed the need to explore sustainable releases of Green Belt land to help alleviate the capital's severe development pressures (notably its housing crisis). And that if releases were shown to be necessary, these should be highly targeted and accord with strict conditions to ensure that they do not come at the expense of London's environmental objectives.
- 1.33 Naturally, responses varied on this topic with some vehemently opposed to any Green Belt release and others understanding the logic and being broadly sympathetic to the propositions. However, unpicking the concerns of those that were more opposed, and the kind of conditions people wished to see applied to release (as well as the Mayor's position reflected in the Towards propositions) revealed some commonalities. The opposition stemmed from concern about the perceived multi-functionality of Green Belt land for

³ Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

recreation, climate resilience, habitat and food growing, as well as fears about sprawl, carbon, air quality and infrastructure impacts.

- 1.34 These have very much informed the exploration of Green Belt from the start. From early on, as reflected in the Towards propositions, the vision that the workstream has reflected is that any release should be highly focused on well-connected places, minimised, and landscape led. As such, as well as addressing social and economic needs, it should deliver clear benefits for the environment and Londoners' experience of it (notably through improved access to Green Space) and be designed to minimise negative impacts. The vision was also that it should also be of sufficient scale to support new local infrastructure and services. This would necessarily involve higher densities than market norms, and also a focus on large-scale urban extensions.
- 1.35 Other comments regarding the scale and complexity of large-scale urban extensions and implications for delivery have also informed consideration of the definition of reasonably plausible plan-period capacity.

Green Belt assessment

London-wide Green Belt assessment

- 1.36 The NPPF requires planning authorities to assess Green Belt land to identify potential 'grey belt' and help inform boundary change decisions. In Greater London, 18 boroughs contain Green Belt, each with its own assessments of varying age and methodological approach. To support the next London Plan, a more consistent, London-wide understanding was needed.
- 1.37 Following changes in national policy, grant funding was provided by government in January 2025 for such assessments to be carried out. The GLA alongside its 12 commissioning boroughs appointed LUC to undertake an independent, London-wide study of Green Belt land. This assesses strategic performance and identifies areas with

potential to be classified as grey belt⁴ in line with prevailing policy⁵, guidance and case law. The study forms part of the London Plan evidence base and is available online. It has been an integral part of the methodology described in Chapter 3 onwards and will also support boroughs in future plan-making, albeit more detailed local studies are also likely to be necessary in the end.

Additional Green Belt evidence

1.38 In addition to the main Green Belt assessment the commission also included a number of future studies aimed at providing detailed evidence and further clarity in relation to a number of specific Green Belt related policy issues. These included:

- Green Belt fundamental impacts report
- Green Belt enhancement opportunities study
- Green Belt to MOL opportunities assessment

1.39 The implications of the findings from these studies and how they have informed the approach are set out in Chapters 4 and 5. Further description of this evidence is also provided in Annex C.

Summary and Implications

1.40 The context set out in this chapter comprises national policy and guidance, London Plan legislation and the relevant technical and engagement evidence base. This has formed the starting point for the workstream set out in this paper which is framed around the expectations of the national policy and legislative positioning of the London Plan, while being appropriately informed and shaped by the evidence to set out a robustly justified response.

⁴ The study does not definitively identify grey belt land; rather, it indicates where land may meet the definition at the strategic scale. Final determinations rest with boroughs through development management and Local Plan processes, in coordination with the Mayor for referable schemes.

⁵ Subsequent changes proposed within the draft NPPF are not considered to materially affect the findings of the assessment. For example, while 'footnote 7' designations were mapped, the study did not assess whether their presence would preclude grey belt classification.

2 Defining Strategic Exceptional Circumstances

- 2.1 The NPPF's brownfield-first approach requires London to meet as much of its development needs within the existing urban area as possible, prioritising previously developed land over greenfield sites. In the search for capacity to meet these needs it must demonstrate that all reasonable alternatives to Green Belt release have been fully explored and that any release is necessary to meet needs that otherwise would be unmet.
- 2.2 As set out in this chapter, the London Plan's Strategic Housing Land Availability Assessment (SHLAA), alongside other evidence and analysis of commercial and housing needs have identified three specific land use types where, if delivery was reliant on developable brownfield capacity alone, the scale of unmet need warrants a strategic response within the London Plan⁶. These are:
- **Residential (and associated mixed use)**
 - **Industrial (primarily storage and distribution)**
 - **Data centres.**
- 2.3 The London Plan does not attempt to proactively plan for all types of Green Belt release that may be proposed within the Plan period. Instead, the Plan has focused upon the types and scale (major) of development anticipated to generate the most significant effects that need to be managed through its policy framework – those set out above. With this in mind, the next section sets out the justification from a national policy perspective.

Strategic identification of unmet needs

- 2.4 Ensuring a sufficient supply of housing is a shared priority of government and the Mayor and a fundamental aim of the London Plan. This requires a sufficient amount and variety

⁶ Note that there is also likely to be a need for Green Belt burial provision to meet strategic needs. This is explained further in the London-wide Burial Audit (2026) and is not explored further here as the NPPF already notes that burial provision is 'not inappropriate' in the Green Belt (see para 154). As such Exceptional Circumstances do not need to be evidenced.

of land, in the right locations, to meet identified housing need, including an appropriate mix of types. There is also a need to consider whether wider development needs can be accommodated in full within the existing urban area to support growth in London's economy.

- 2.5 These needs arise from multiple factors, but for all land uses, consideration of the balance between the demand for land and the capacity or supply that can be reasonably assumed to be developable within the plan period is critical. Given delivery challenges, it is also important as part of this to consider the potential role of Green Belt land in helping overcome these. These considerations are summarised in the following sections.

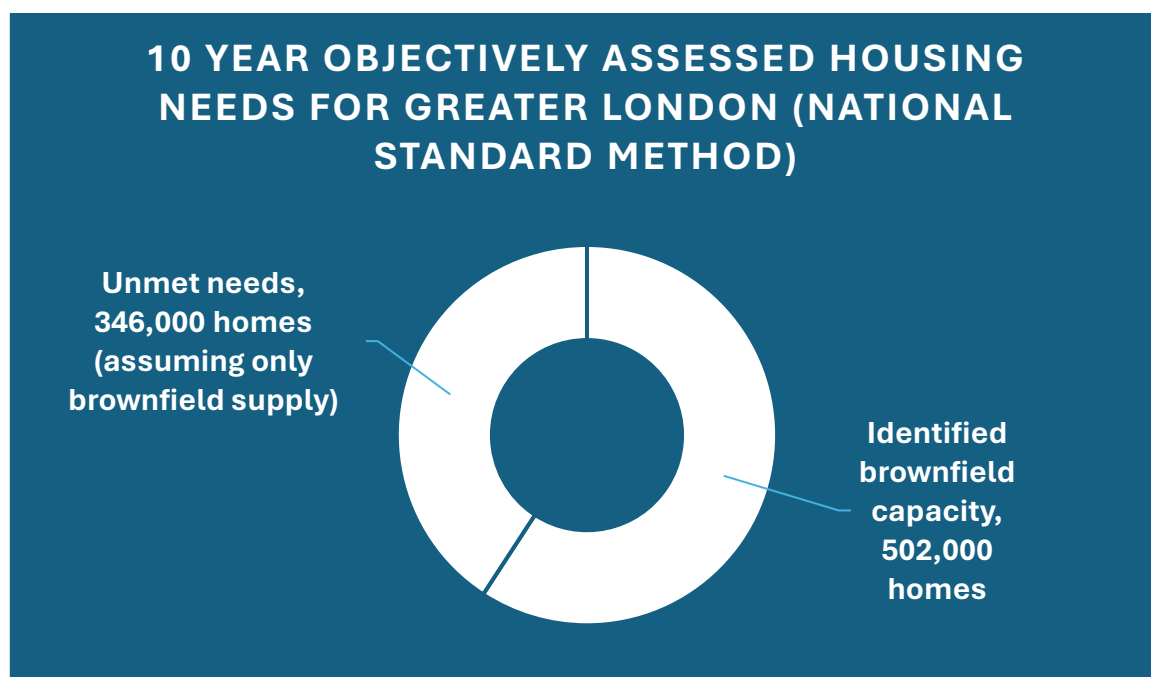
Residential

- 2.6 The December 2024 NPPF included a new methodology for calculating housing need known as the 'Standard Method'. The Standard Method is now mandatory for all LPAs to use as a starting point for plan-making.
- 2.7 The London Plan provides boroughs with a housing requirement figure which disaggregates London's overall housing need into bespoke targets that reflect that borough's identified capacity to deliver new homes. In line with NPPF changes and the government's new methodology, London's objectively assessed housing need is set at 84 800 per annum over 10 years, or 848,000 over the first 10 years of the Plan period. This represents a major increase from the previous target of 52,287 homes per year in the 2021 London Plan (or 522,870 across the Plan period) and requires an unprecedented step change in delivery. In the modern statistical era, London has never before recorded housing delivery at the rate now expected by these national needs figures.
- 2.8 To address this need, the draft Plan establishes minimum annual housing targets for each borough for the period until 2037. These are capacity-based and informed by extensive evidence as drawn together in the GLA's 2026 Strategic Housing Land Availability Assessment (SHLAA) available online. Housing delivery is influenced not only by land availability, infrastructure and environmental constraints, but also by viability, which is shaped by wider macroeconomic conditions. The SHLAA takes account of this by incorporating assumptions on the achievability of different development typologies over the target setting period.
- 2.9 Overall, the position established by the SHLAA and other supporting evidence is that London has capacity to deliver around 502,000 homes within its urban extent within the

first ten years of the Plan period. Even though it is below the need figure, it is highly ambitious, including a range of assumptions and stretching policy changes to drive an upturn from present delivery rates. As such it is considered to represent a maximum reasonable target for brownfield or underutilised land.

- 2.10 This is based on a comprehensive assessment of London's brownfield supply, firstly drawing on the 'Land4London' database of large sites. Robust, design-led capacity estimates have been developed with boroughs for all such sites and combined with modelling of build-out rates across the existing permissions pipeline to establish an overall baseline capacity.
- 2.11 In addition, new and innovative policy measures have been tested and applied to unlock additional brownfield residential capacity. Of greatest significance are the optimisation framework and Sustainable Access Measure (SAM), which revisit density assumptions across the city based on connectivity and context; the selective release of industrial land in well-connected locations; and new policies supporting small sites. Together, these measures are expected to generate significant additional capacity overall, though we have had to moderate capacity and phasing in the ten-year period to ensure deliverability and reasonableness, taking account of infrastructure, viability and wider strategic impacts. Detail of how each of these measures have been tested and optimised to increase the brownfield housing capacity to the maximum reasonable level is set out within the main SHLAA report.
- 2.12 Even with these additional measures, the maximum 10 year reasonably plausible brownfield capacity is assessed to be around 502,000. This falls approximately 346,000 short of the objectively assessed national need figures calculated using the government's Standard Method, leaving a considerable unmet gap to need for residential, as illustrated in the figure below.

Figure: 2 - Greater London's 10 year objectively assessed housing needs against identified capacity for housing



2.13 Consistent with the NPPF, the approach in calculating the target reflects capacity and London's distinct circumstances, with high housing need and constrained land supply, and the need to support sustainable development. It also draws on trends in delivery and consents and on strategic viability evidence. As targets are significantly impacted by current viability conditions, they represent a minimum baseline, with the Mayor clear that higher delivery is expected to be planned for as conditions improve. This means that the plan does identify longer term capacity to achieve which would reach a target of 850,000 homes, however this is not considered feasible within the first ten years. Although the overall brownfield target is well below the government's objectively assessed needs figure, it is the most ambitious figure that is robust, developable and therefore considered sound based on the available evidence.

2.14 Such a considerable unmet need clearly necessitates robust consideration of all other opportunities to increase this figure including, where necessary, Green Belt land. It should also be noted that delivering this significant brownfield capacity target is also largely reliant on relatively uniform types of development - typically of large, previously developed and highly constrained urban sites. As a result, the brownfield supply not only leaves a quantitative shortfall but also offers more limited diversity in supply, which may constrain delivery. In the context of a challenging viability environment, this lack of

diversity in supply would be a weakness in any London Plan strategy which assumed delivery reliant on developable brownfield capacity alone.

Employment

- 2.15 Unlike residential, the government does not produce objectively assessed needs figures for commercial forms of development. To accurately anticipate these needs and support the London Plan development, the GLA commissioned consultants Arup and Nexus Planning to produce an Economic Uses Demand and Supply study (2026). This provides an assessment of growth trends across employment sectors and the associated demand for land. These demands are assessed against anticipated land supply to identify potential surpluses and shortfalls.
- 2.16 The evidence indicates that the largest anticipated shortfall over the plan period relates to storage and distribution uses (Use Class B8). Demand is expected to grow significantly due to population growth and structural changes within the sector. Additional capacity is also required to support business expansion, relocation from lower-quality sites, and continued international competitiveness. This requires a strategic approach.
- 2.17 This demand forecast incorporates assumptions that increasing efficiency gains will be achieved through measures such as automation, layout optimisation, digital inventory management, higher floor heights and industrial intensification where appropriate. These measures reduce the amount of land required for storage and distribution uses over time and can be supported through the planning system. In line with NPPF requirements, the forecast therefore assumes that industrial land is used as efficiently as possible. Further detail of these assumptions is provided in the Industrial Evidence Paper and the Economic Uses Demand and Supply study.
- 2.18 With future demand established, evidence has also been prepared to assess the land supply available to meet it. This draws on historic trends in industrial land gains and losses and the portfolio of suitable sites identified through the London Industrial Land Supply Study. It also robustly interrogates assumptions regarding intensification, having further explored this through case study analysis and industry engagement. This evidence has also considered how demand will be further increased by the additional selective releases of industrial areas planned through the London Plan to deliver housing in the most well-

connected locations, and the implications for the balance of industrial land supply and demand across property market areas (PMAs).

- 2.19 Across London, the position set out in the Industrial Evidence Paper is that there is an identified shortfall of around 350 hectares of industrial land over the first 10 years of the plan. This is predominantly for storage and distribution uses, but also to replace some land identified for release that is still needed from a quantitative perspective. This shortfall increases to around 560 hectares by 2050.
- 2.20 These figures represent the additional land required to meet identified need after all reasonable measures to optimise industrial land within the existing urban area have been applied, and in light of the plan's approach to making best use of land which has prioritised residential in some areas. This shortfall indicates a strategically significant unmet need that cannot be addressed through brownfield land alone. As set out in the supporting evidence and Industrial Evidence Paper, the GLA has explored all reasonable options to increase capacity within the existing industrial land supply before reaching this conclusion.

Data centres

- 2.21 Data centres are another development type for which both GLA and national evidence indicate significant future growth, warranting a strategic response through the London Plan and its approach to Green Belt management. Since 2021, there has been a substantial increase in data centre planning activity and development. This trend is evident nationally, including a growing number of proposals on Green Belt land. For example, consent for what may become Europe's largest cloud and AI data centre was approved on Green Belt land in 2025 just outside of London's boundary in Hertsmere⁷.
- 2.22 As with other commercial uses, the government does not publish demand forecasts for data centres. To better understand future requirements, the GLA commissioned the Data Centre Future Growth Forecasts and Strategic Insights report (Buro Happold, 2025 [available online](#)), which forms part of the London Plan evidence base. The study indicates that London's data centre sector is undergoing a significant transformation and is likely to grow substantially by 2050, potentially increasing ten-fold. It highlights that data

⁷ Hertsmere Borough Council's: Data centre given outline permission (Jan 2026) [online](#)

centres often achieve higher land values than traditional industrial and warehouse uses, enabling them to compete successfully for scarce development sites. As a result, they are increasingly displacing other employment uses within strategic designated industrial sites. Given the increasingly limited and constrained supply of industrial land and the draft London Plan's priority to safeguard designated sites for industrial and logistics uses (or targeted release for housing), the study identifies growing interest in larger Green Belt sites for strategic data centre development.

2.23 This growth is also being driven, or at least supported, by changes in the national policy context. The 2024 NPPF strengthened recognition of the strategic importance of data centres in supporting the modern economy. Further national planning policy support for them is expected to be set out in a new National Policy Statement.

2.24 This surge in demand and sector growth, combined with a highly constrained supply of industrial land within London, is likely to increase pressure for data centre development on Green Belt land during the Plan period. Given the supportive national policy context and limited urban land supply, a strategic response through the London Plan is required to ensure any such development aligns with wider spatial and growth objectives, even where the exact anticipated deficit in land supply has not been quantified.

Alternatives supply sources considered.

2.25 In addition to the policy measures incorporated into the draft Plan, other options to increase brownfield supply were considered but ultimately discounted due to practical, environmental or policy constraints. As outlined above, the SHLAA incorporates extensive measures to maximise brownfield capacity, including the selective release of industrial land, higher density assumptions and greater delivery from small sites. These measures have been tested to balance increased housing supply against infrastructure, environmental and wider strategic considerations, ensuring that capacity assumptions are stretching but remain feasible.

2.26 In an effort to exhaust all reasonable alternatives to Green Belt release, London's Metropolitan Open Land (MOL) was also considered as a potential source of development capacity. Although predominantly greenfield in nature, MOL lies within the urban area and therefore warrants consideration. The Mayor's Towards a New London Plan

consultation noted the potential for release in limited circumstances, including some golf courses where development could support improved public access to open space. Accordingly, MOL was assessed for its potential suitability for strategic release using a consistent methodology.

2.27 MOL covers approximately 15,700 hectares within London's urban area and performs important functions as accessible open space, green infrastructure, and land for sport and recreation. This is particularly significant given the widespread deficiencies in access to public open space across parts of London identified through London Plan evidence⁸ and the Mayor's strategic objectives to increase access to nature for Londoners. With increasing density across London part of the draft London Plan spatial strategy, MOL and other green spaces within the urban area will also play an increasingly important role for Londoners' health and wellbeing in this context. Any release would therefore need to meet strict criteria to ensure land providing essential functions is retained. Development would also be expected to support sustainable patterns of growth, for residential, including through high-quality, medium-density schemes with low car dependency and good public transport connectivity.

2.28 The assessment of potentially suitable MOL capacity therefore excluded:

- Areas not within walking distance to a rail station (15mins - 1200m).
- Areas used as accessible green space (i.e. is freely publicly accessible).
- Areas covered by one the 'primary constraints' – land uses or formal designations considered to effectively rule out future development potential (discussed in detail in chapter 4).

2.29 Accounting for these exclusions, testing indicates that only a very small proportion of MOL (around 1-3 per cent) may be suitable for release, with 'constraints exclusions' in particular highlighting the multi-functional role of MOL. This equates to approximately 30-50 sites across London, typically small in scale (with an average size of around 4 hectares). While not insubstantial in scale cumulatively, it was decided that there was unlikely to be a London-wide justification for a systematic approach to release, with decisions regarding its acceptability likely to be highly context-specific. Moreover, unlike industrial land release, there is no strategically identified 'surplus' to help offset release

⁸ Public Open Space mechanisms review report, LUC 2026, [available online](#).

and re-provision with the same geographical functionality could not be assumed. While identified sites may come forward through Local Plans, with London Plan policy adjustments to allow for this where justified, overall MOL is not judged to be a reasonably plausible (or desirable) source of supply that can be depended on. Any supply from this source would be treated as a windfall.

- 2.30 No other strategically significant sources of land within London's urban area have been identified that could provide a reasonable alternative to meet the identified shortfall in development capacity.

Neighbouring authorities' ability to accommodate unmet needs.

- 2.31 Paragraph 147 of the NPPF requires authorities that cannot meet development needs through brownfield land and density optimisation alone to consider whether neighbouring authorities could accommodate some of that need. While this requirement is primarily directed at Local Planning Authorities, it is also relevant to assess whether London's unmet development needs could be accommodated elsewhere, thereby reducing the need for Green Belt release.
- 2.32 Greater London shares boundaries with 17 local authorities and nine upper-tier authorities. All adjoining authorities contain parts of the Metropolitan Green Belt and are subject to the same requirement to plan to meet their own development needs. The Planning and Infrastructure Act 2025 creates a duty to undertake strategic planning across the whole of England, under which all areas will ultimately be covered by a Spatial Development Strategy (SDS). Government proposals indicate that in the future Greater London may border SDS areas covering Hertfordshire, Greater Essex, Kent, Surrey, Windsor and Maidenhead/Slough and Buckinghamshire, though these SDS geographies are yet to be confirmed⁹. At present, the Greater London Authority remains the only strategic planning authority in the South and Southeast of England and the London Plan the only SDS. As a result, the draft London Plan has not been prepared alongside equivalent strategic plans in neighbouring areas, as will ultimately be the case. While there are some cross-boundary informal groupings of authorities, these are not formally

⁹ MHCLG consultation: Areas for producing spatial development strategies (Feb 2026) [online](#)

constituted in a way that enables effective engagement with the distribution of unmet needs (and engagement presently tends to be limited to information sharing).

- 2.33 Moreover, redistributing London's unmet development needs to neighbouring authorities is not considered a sustainable or reasonable solution. The needs identified through the evidence - particularly for housing and storage and distribution - arise from London's population, economy and property markets. This is required within its own property and housing market areas to service its own population and support growth. Development in neighbouring areas may help meet local needs but would not meaningfully address London's strategic requirements. For example, additional storage and distribution capacity beyond London would still result in needs closer to the market actually being served given the importance of reliable delivery access.
- 2.34 Redistribution would also risk creating less sustainable patterns of development. Additional housing growth in surrounding towns and cities would likely increase commuting distances and place further pressure on transport networks. Development outside London would generally be less well connected, be at lower densities, and result in longer journeys than development accommodated within Greater London. It would be more likely to be car-based, and both this and additional public transport journeys would potentially take up network capacity needed to accommodate growth within London (as well as having adverse environmental and other impacts). Unlike previous plans, the draft London Plan assumes only modest rail enhancements over the first 10 years of the Plan period, reflecting currently funded and committed infrastructure programmes. As a result, growth in the shorter to medium term has to be accommodated largely through existing infrastructure. Similarly, relocating storage and distribution uses beyond London's boundary would increase freight movements on the Strategic Road Network, with significant implications for congestion and air quality.
- 2.35 Even if these wider concerns were set aside, it is unlikely that neighbouring authorities have sufficient capacity (or appetite) to accommodate a significant share of London's unmet development needs, particularly for housing. The table below summarises the latest published housing land supply positions of authorities adjoining Greater London and the adoption dates of their Local Plans.

Table 1 - Example of adjoining LPA housing land supply positions

Authority	Type	Published housing land supply position (years) ¹⁰	Year position published	Year plan adopted
Brentwood	District	5.18	2021	2022
Broxbourne	District	5.79	2022	2020
Buckinghamshire	Unitary	0.75*; 0.91**	2024*/**	2011*/**
Dartford	District	5.6	2025	2011
Elmbridge	District	4.36	2022	2011
Epping Forest	District	4.2	2021	2023
Epsom & Ewell	District	1.49	2025	2007
Hertsmere	District	2.6	2023	2013
Reigate & Banstead	District	7.8	2023	2014
Sevenoaks	District	2.96	2025	2011
Slough	Unitary	2.5	2025	2008
Spelthorne	District	3.8	2023	2009
Tandridge	District	1.57	2022	2008
Three Rivers	District	1.9	2022	2011
Thurrock	Unitary	0.91	2023	2015
Watford	District	5.21	2020	2022
Welwyn Hatfield	District	2.46	2021	2023
Windsor and Maidenhead	District	4.69	2024	2022

*Chiltern; **South Bucks

2.36 The housing land supply position set out above indicates that most adjoining authorities have less than a five-year housing land supply based on meeting their own local needs. Only three authorities report a supply of five years or more, and for two of these the most recent assessment predates the 2024 NPPF, which reinstated mandatory housing targets and introduced a revised standard method for assessing need. As these changes have increased housing requirements in most areas, housing land supply pressures are likely to intensify. While new plans may identify new capacity, many will be as constrained by Green Belt considerations as London itself. It is therefore unrealistic to assume that

¹⁰ Source: Planning resource housing land supply table, available [online](#)

neighbouring authorities can absorb a significant proportion of London's unmet housing need, even if such an approach were considered sustainable.

- 2.37 This may be somewhat different for data centres, where accommodating some demand outside Greater London may represent a credible alternative. These uses are often concentrated in locations with access to strategic power and fibre-optic infrastructure, and areas such as Slough have already experienced substantial growth in the sector. Unlike housing or industrial uses, data centres can serve wider markets that may be less dependent on geographic proximity. This is something that ultimately needs to be addressed at a national scale through the National Policy Statement, given the considerable infrastructure and other impacts of data centres. However, while this is awaited, it is not considered reasonable to expect that all data centre demand that cannot be accommodated on brownfield land could be directed beyond London's boundary. Given the scale of projected growth and the supportive national policy context, pressure for data centre development within London's Green Belt is likely to continue. The London Plan therefore needs to set out a strategic approach in order to ensure that such proposals are considered within a coherent spatial framework and include necessary mitigation.
- 2.38 Overall, the position taken is that for these land uses, it is not reasonable or credible to expect wider SE authorities to make up London's unmet development needs, thereby leaving the case for GB release relevant and necessary.

Green Belt land supply opportunities

- 2.39 In addition to addressing identified capacity shortfalls, Green Belt land can, in some circumstances, present unique opportunities that are relevant when considering exceptional circumstances.
- 2.40 As will be discussed in chapter 3, parts of the Green Belt within Greater London are unique in their density of high-quality transport infrastructure. This means that certain areas are well-connected for differing development types, and in some cases are better connected than areas of brownfield land within London's outer suburbs. For instance, some areas sit immediately adjacent to well-connected train stations and local centres and may, therefore, in fact be better placed to support sustainable patterns of residential

developments than some periphery suburban brownfield locations with little or no public transport.

- 2.41 Some Green Belt sites are also strategically well located for storage and distribution development, particularly where they have good access to the Strategic Road Network (SRN). In certain cases, these locations may be more appropriate than constrained urban sites. Directing industrial development to such areas could reduce noise and air quality impacts on existing communities while supporting economic activity through enabling the development of modern, fit for purpose and efficient premises well located to meet transport needs.
- 2.42 The ability of these sites to support sustainable development is therefore an important consideration in assessing exceptional circumstances, particularly when combined with a targeted spatial approach to release.
- 2.43 Strategic scale Green Belt release can also support comprehensive master planned development and infrastructure delivery. As described in Chapter 4, the draft new London Plan identifies broad locations for growth capable of accommodating large-scale urban extensions and strategic industrial developments. The scale and critical mass of these locations enable plan-led approaches to infrastructure improvements, similar to those typically associated with London's largest brownfield sites. It creates opportunities for landscape-led design and to realise strategic objectives including improved access to nature and facilities that may benefit existing residents.
- 2.44 Selective Green Belt release can also contribute to the diversification of London's development land supply. Brownfield capacity remains highly constrained and faces viability and delivery challenges. Introducing a broader range of sites can help support delivery by diversifying development types, site scales, tenures and delivery models. These benefits are particularly relevant given the scale of unmet need, continued development pressures and challenging economic conditions.
- 2.45 Finally, in relation to data centres, consideration must also be given to their significant infrastructure and operational requirements and the implications these have on London's brownfield supply. Strategic Green Belt locations may help accommodate these demands while reducing pressure on protected industrial land and supporting growth beyond existing clusters. They also provide opportunities to enable the use of waste heat in planned residential developments. While the draft Plan includes policies to address

infrastructure requirements directly, the potential for Green Belt land (and particularly grey belt) to provide additional and more suitable locations for data centre development is also recognised.

Exceptional circumstances conclusion

- 2.46 In order to understand London's development needs for a wide range of development types, the GLA has prepared an extensive evidence base comprising various commissioned studies and reports in addition to its updated SHLAA and SHMA. Although this report does not attempt to repeat the vast depth and breadth of analysis and commentary presented across this evidence, the resulting strategic position in terms of three key land uses have been discussed, namely residential, storage and distribution and data centres.
- 2.47 The combined evidence base demonstrates that London faces substantial unmet development needs that cannot be accommodated through its brownfield land supply alone, even when significant steps to optimise supply and increase density have been taken. For housing, the Strategic Housing Land Availability Assessment (SHLAA) has comprehensively assessed and optimised all reasonable sources of brownfield capacity, including strategic sites, small sites, infill development and the selective release of industrial land together with higher density assumptions. Despite these measures, identified (developable) capacity remains significantly below assessed housing need, resulting in a substantial shortfall over the Plan period. The analysis also highlights the delivery risks particularly associated with large, complex urban sites in a challenging viability context.
- 2.48 A similar position is identified for industrial storage and distribution uses. Even after applying ambitious assumptions around industrial intensification, operational efficiencies and optimisation of existing sites, the evidence indicates a significant deficit in available land. Demand is expected to continue to grow as a result of population growth, economic change and the need to retain and expand industrial activity. This shortfall is exacerbated by plans to selectively release some industrial sites for housing in a bid to overall make best use of land. The evidence also identifies continued and substantial growth in demand for data centres, driven by technological change and a highly supportive national policy context.

- 2.49 Together, these findings point to strategically significant development needs that cannot be fully addressed within London's existing urban area. The GLA has tested a range of alternative approaches before considering Green Belt release. This includes extensive optimisation of brownfield capacity, assessment of Metropolitan Open Land, and consideration of whether unmet needs could be accommodated by neighbouring authorities. The evidence indicates that Metropolitan Open Land provides only limited and fragmented opportunities that are not strategically significant, while neighbouring authorities generally lack the capacity (or willingness) to absorb London's needs and, in many cases, face similar land supply challenges. In addition, redistribution of development to surrounding areas would be unlikely to represent a sustainable pattern of growth and could increase pressure on transport infrastructure.
- 2.50 Failing to address these shortfalls as far as is possible and reasonable, would exacerbate existing challenges, including housing affordability, overcrowding and rough sleeping, while constraining economic growth and investment. Accommodating additional development within London's Green Belt would help support job creation, increase tax revenues, support the delivery of infrastructure and services, and help meet the needs of a growing population and economy. While increasing land supply alone cannot resolve wider structural issues, the Mayor and boroughs have a clear responsibility to minimise these deficits wherever, and as far as, possible within the overall aims of good growth. Taken together, the scale of unmet need and the consequences of inaction provide a strong strategic justification for exploring the role of selective Green Belt release as part of a balanced and sustainable response.
- 2.51 The evidence also demonstrates that selective Green Belt release may offer some particularly important opportunities. Certain Green Belt locations benefit from excellent transport connectivity, high quality access to the strategic road network, and may provide the scale necessary to support comprehensive master planning and infrastructure delivery. Selective release could help not only to address identified shortfalls in housing, industrial land and data centre provision, but also support a more diverse supply and sustainable forms of development. Taken together, the evidence demonstrates that all reasonable alternatives have been explored and that a strong case exists for the London Plan to consider the role of selective Green Belt release as part of its long-term spatial strategy.
- 2.52 With this in mind it is considered that there is a strong case for strategic scale exceptional circumstances across Greater London that justifies future amendments to Green Belt

boundaries through local plans that would be necessary to bring forward relevant sites for development. The draft Plan proposes that some limited and targeted release of Green Belt land would represent a sustainable way to accommodate a portion of this unmet need (over both the initial ten-year period and beyond).

- 2.53 In addition to establishing the extent of unmet needs and the strategic case for exceptional circumstance, the London Plan also has a critical role in setting a strategy for the extent, distribution and form of growth within London's Green Belt to accommodate as much of this unmet need as is reasonable. This strategy must overall align with the Mayor's Good Growth objectives and must be carefully measured against strategic impacts to remain sound and deliverable: this is what defined by reasonableness. The remainder of this report therefore set outs the approach taken in relation to future Green Belt release as part of a sound spatial strategy and associated mitigation in the form of additional policy measures.

3 Defining Sustainable Locations

Grey belt

Weight in strategic plan-making

3.1 Paragraph 148 of the NPPF establishes a preference for the release of previously developed land and other forms of grey belt where Green Belt release is required. However, this is expressly qualified by the need to promote sustainable patterns of development, with particular regard to connectivity and opportunities to prioritise sustainable transport. As a result, the sequential approach does not require grey belt land to be released regardless of location; rather, sustainability considerations remain the primary factor in determining suitable locations for growth.

3.2 The formal consultation response issued by government upon publishing the current NPPF restated this position and clarified the need to balance matters of sustainable locations against grey belt status. It stated that:

“After careful consideration of the consultation responses, drafting changes have been made to the sequential test to make clear that, whilst priority should be given to Previously Developed Land and grey belt land, this is within the context of an overall sustainability judgement, including considerations of sustainable transport. This is to enable local planning authorities to continue to make sensible judgements (through the Plan-making process) about the most sustainable locations for development to meet needs. This means that more sustainable sites on higher performing Green Belt land (for example around train stations) can be brought forward without all Previously Developed Land and grey belt opportunities having to be exhausted first” (Q29, Feb 2025 – emphasis added¹¹).

3.3 So, while grey belt status is an important consideration under NPPF, it does not determine whether a site is suitable for development. Recent appeal decisions have confirmed that sustainability remains a decisive factor, even where land is identified as grey belt and there is a clear unmet development need¹². Such decisions demonstrate that

¹¹MHCLG, Government response to proposed reforms to the NPPF, [available online](#).

¹²e.g. MHCLG, Recovered appeal decision (Kings Farm, Orsett) April 2026, [available online](#).

grey belt status should not override wider policy objectives where a site is poorly connected or reliant on car-based travel.

- 3.4 The identification of grey belt must therefore be balanced against the need to direct development to sustainable locations. This can be regarded as an overriding concern, especially in the context of strategic plan-making where the cumulative and aggregate impacts of growth have to be considered and managed. It is therefore appropriate to prioritise well-connected locations that can support sustainable development, even where other areas perform less strongly against Green Belt purposes.

Grey belt evidence

- 3.5 While sustainability considerations are paramount, paragraph 148 of the NPPF requires strategic authorities to take account of the distribution of grey belt land when considering options for growth. This expectation is reinforced by national practice planning guidance (NPPG), which states *“Green Belt assessments should also inform the preparation of Spatial Development Strategies where these will be setting the strategic context for land release”* (para.002¹³). To provide a consistent evidence base for the London Plan, the GLA commissioned LUC to undertake the first ever London-wide Green Belt assessment. The study covers all Green Belt land in Greater London and was prepared in full accordance with the NPPF and NPPG. The report and its findings can be read alongside this evidence paper¹⁴.
- 3.6 The assessment identified and analysed more than 1,000 Green Belt parcels. Each parcel was assessed against four of the five Green Belt purposes and assigned a contribution rating ranging from strong to weak or no contribution against each. Purpose E (to assist in urban regeneration) was not assessed on a parcel-by-parcel basis, as it was considered inappropriate to distinguish variation between sites at a strategic scale. It is also not relevant in the identification of grey belt. Instead, all parcels were assigned a uniform ‘moderate’ contribution for this purpose. Parcel boundaries and assessment scores were developed with input from participating and commissioning Green Belt boroughs.
- 3.7 The resulting findings provide an indication of where land has the potential to meet the grey belt definition at a strategic scale. However, the study does not definitively identify grey belt land. Given its strategic nature and limitations (for instance the application of a

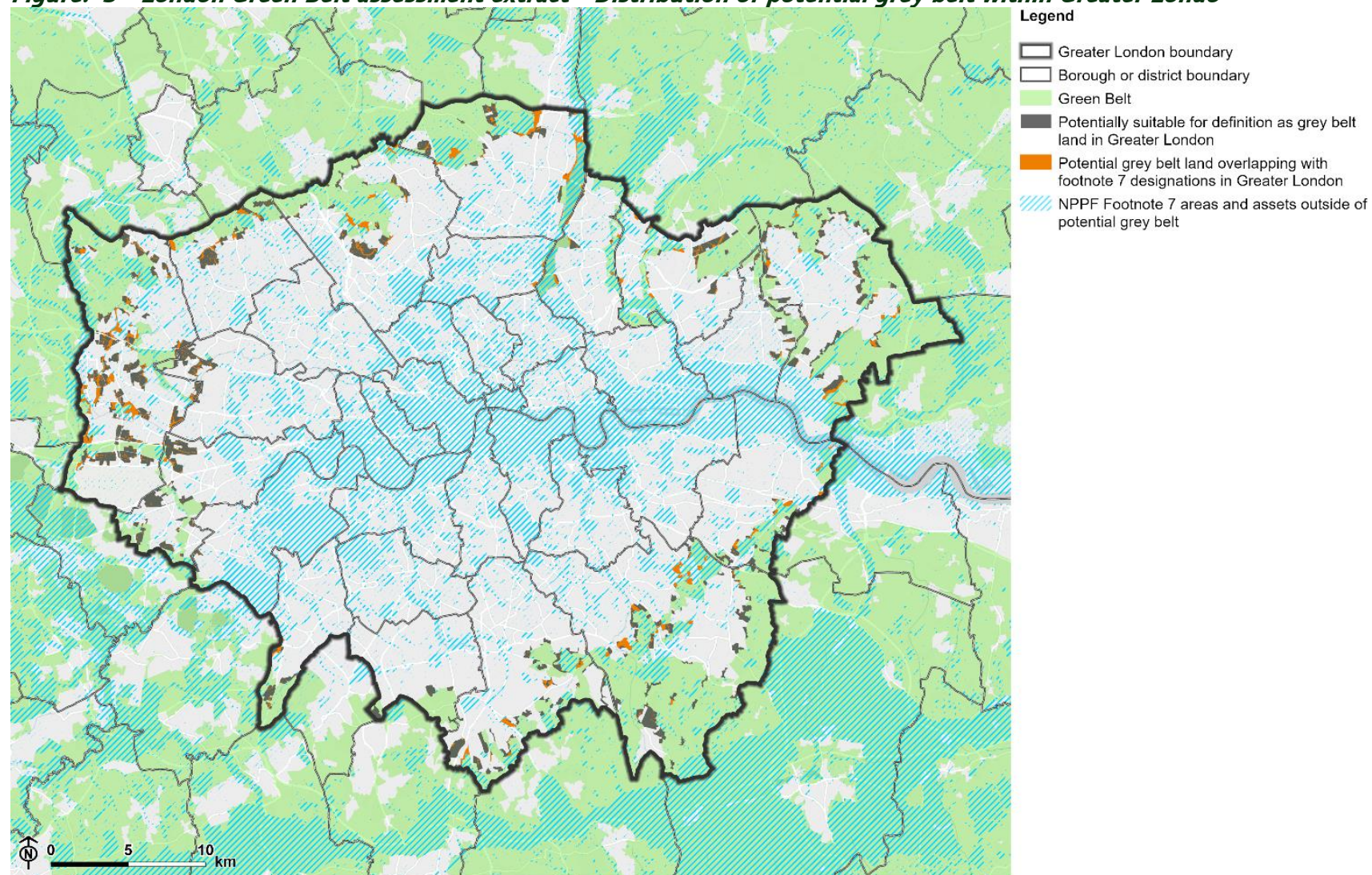
¹³ MHCLG, NPPG Green Belt, Feb 2025, [available online](#).

¹⁴ London Green Belt Assessment, LUC, May 2026, [available online](#).

minimum parcel size of five hectares), additional areas may be identified through more detailed local assessments. The study also maps the presence of 'footnote 7 designations' but does not attempt to assess whether they would preclude development or provide a strong reason for refusing development. Nevertheless, it provides a robust and consistent picture of the variations in performance of London's Green Belt and associated distribution of anticipated grey belt.

- 3.8 Overall, the assessment estimates that around 20 per cent of London's Green Belt (c.6,900 ha) could meet grey belt criteria. It identifies significant variations in Green Belt performance, both within boroughs and across regions, with potential grey belt concentrated in some boroughs. Together, Hillingdon, Bromley, and Havering account for 50 per cent of all identified grey belt land, while the 11 smallest contributors make up only 25 per cent. The figure below, taken from this study, shows the general distribution of potential grey belt land identified.

Figure: 3 - London Green Belt assessment extract - Distribution of potential grey belt within Greater Londo



Created by LUC - 13359_002_London_GB_Review_Main_Report/003_r4_London_Wide_Grey_Belt_AA_Final 26/03/2026
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- 3.9 The assessment identifies a highly uneven and fragmented distribution of potential grey belt land across London. Areas featuring more fragmented areas of Green Belt that are isolated from the wider countryside and therefore make a weaker contribution to preventing urban sprawl (purpose A) tend to have particularly higher concentrations of potential grey belt. This pattern is particularly evident in parts of west London. However, even in areas with a high proportion of grey belt, its distribution remains fragmented – often involving smaller infill sites (representing remaining green wedges and islands), rather than any consolidated strategic-scale clusters.
- 3.10 The study does not aim to assess suitability for release. Importantly, if its findings were used as the primary basis for identifying growth locations, the resultant development would be dispersed across numerous small and often disconnected sites across wide areas. Such a pattern would not provide the scale of development needed to provide a ‘critical mass’ to justify and focus strategic infrastructure investment (including meaningful public transport improvements and significant new green infrastructure), as well as viable shops and services. The distribution of potential grey belt also shows little correlation with transport connectivity or infrastructure, limiting opportunities for higher-density, sustainable residential development. As a result, such a spatial distribution of growth would take considerably more land to make the same strategic contribution to housing need than one that is focused on well-connected locations suitable for higher densities. In doing so, it would also be more likely to generate significant adverse impacts such as on congestion and air-quality, as well as through loss of greenspace and functions such as ground permeability (eroding flood risk mitigation). In the case of industrial uses, many potential grey belt parcels are located within established suburban areas and are poorly related to the Strategic Road Network, making them less suitable for industrial, storage and distribution activities.
- 3.11 The scope of the grey belt assessment is also inherently limited in terms of what is considered. The NPPF definition is based primarily on a site's contribution to Green Belt purposes and does not account for the full range of planning considerations relevant to development suitability. Green Belt land often performs other important functions and may also be valued for its environmental, ecological, historic, cultural or recreational significance. Many areas identified as potential grey belt support these functions and may therefore be unsuitable for development despite their lower performance against Green Belt purposes. For instance, in numerous locations the study found parcels that would

potentially meet grey belt criteria, despite performing important functions such as accessible green space.

- 3.12 Grey belt status must not therefore be regarded as a proxy for development suitability or sustainable location. While it remains a relevant material consideration, the evidence demonstrates that it provides only a very partial assessment of a site's planning merits, and reliance on grey belt distribution would clearly not provide sustainable patterns of development. Instead, a broader assessment is required, taking account of sustainable development objectives and hence connectivity, infrastructure capacity and environmental considerations. The remainder of this chapter will therefore explore how the London Plan has defined and broadly identified sustainable locations for the three key land uses with a strategic need for Green Belt development.

Rationale for strategic sustainable location criteria

- 3.13 Chapter 9 of the NPPF contains a high-level framework for the definition of a sustainable location based on promoting sustainable transport, for instance the availability of genuine transport choices. It emphasises the need for transport issues to be vision-led and integral to early plan-making choices, marking a shift away from just considering transport impacts and requirements once a scheme has been formulated. Instead, the NPPF now expects spatial strategies to actively manage patterns of growth to support sustainable transport objectives, which in turn support key outcomes. This includes the following explicit expectation:

“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. This can help to reduce congestion and emissions, and improve air quality and public health” (p.110)

- 3.14 The Draft revised NPPF expands on these objectives further and includes policies which expressly direct developments to areas well-connected by transport infrastructure. In particular, it proposes the introduction of a presumption in favour of residential developments in locations that are within walking distance to train stations, including within the Green Belt regardless of grey belt status.

- 3.15 Together, this provides a strong policy framework that actively prioritises the suitability and sustainability of locations for development and ensures that this may constitute an overriding consideration when formulating a spatial strategy. This is a key starting point. However, as national policy, the NPPF does not take account of the unique context and circumstances of Greater London and the ways in which these reasonably and necessarily affect judgements relating to sustainable locations for development and what constitutes an appropriate level of connectivity. In particular, the quality and availability of transport infrastructure within parts of the Green Belt; the existing stress on the current transport network, and its ability to accommodate future growth; and consequently, the likely disproportionate effects of additional car dependent development (e.g. on congestion, air quality and land-take)¹⁵.
- 3.16 These factors are considered to provide justification for a much more tailored and focused approach: a strategic response within the London Plan which builds upon the national framework. This also reflects that the NPPF definition and focus is on sustainable locations in the Green Belt for residential development, whereas the needs discussed in this paper are wider. The remainder of this chapter details the strategic (and ultimately directive) approach for the different uses for which exceptional circumstances have been established.

Sustainable locations criteria - Residential

Rationale for focus on rail network connectivity

- 3.17 Given the above considerations, in London, sustainable residential development in the Green Belt must be focused on locations with good access to high-quality public transport, enabling efficient use of land and car-light patterns of growth, and minimising green belt release and therefore loss of greenspace (with its multifunction including for climate resilience). London's Green Belt benefits from an unusually dense rail network but not all of it is well-connected to key destinations, particularly strategic employment locations, or with services of sufficient frequency and duration to encourage widespread usage instead of the car.

¹⁵ See the plan's transport evidence base online

3.18 With this in mind, the principle in the draft NPPF of focusing Green Belt releases for major housing development towards well-connected land close to rail stations is endorsed by the Mayor. However, as made clear in the Mayor's formal response to the consultation, it is considered that the connectivity thresholds for 'well-connected stations' proposed nationally are inappropriate for the London context and should be strengthened through the London Plan¹⁶.

Defining 'well connected' stations in the London context

3.19 In order to determine the appropriate definition of 'well-connected' stations for the London context, the GLA and TfL assessed every rail station within, or adjacent to London's Green Belt through a consistent methodology. This includes 130 individual stations serving all rail types, including national rail, London underground, London overground and tram services. Station connectivity scores were then calculated for each, based on a combination of both service frequency, together with data on access to jobs afforded by that station (assuming a maximum travel to work time of 50 mins). Every station was then provided a score of either high, medium, low or very low connectivity, as detailed in the matrix below.

Table 2 - Station scoring criteria

Access to jobs within 50 minutes by public transport	Less than 4 trains per hour	Trains every 15 minutes or less (4 to 6 trains per hour)	Trains every 10 minutes or less (6 to 8 trains per hour)	Trains every 7.5 minutes or less (8 or more trains per hour)
0 to 160,000	Very low	Very low	Low	Medium
160,000 to 260,000	Low	Low	Medium	Medium
260,000 to 875,000	Low	Medium	Medium	High
More than 875,000	Medium	Medium	High	High

¹⁶ GLA NPPF response March 2026, [available online](#).

- 3.20 The frequency at each station is derived from Railplan, a strategic public transport assignment model for trips to, from and through London. It models the likely route and service choices of public transport users to inform outcomes such as route choice, crowding, distance travelled, and time taken. This considered all lines and all directions and is divided by two. Thus, where a station is served by only one rail line, this represents the average one-way frequency, while stations served by multiple lines benefit in the score from this additional service. The central scenario for the analysis uses Railplan run IP26 (Interpeak 2026), although a sensitivity option exists to use AM26 (Morning peak 2026) as was used in the previous version of the analysis.
- 3.21 The access to jobs within 50 minutes at each station figure was derived from application of the Sustainable Access Measure tool, which measures access to jobs from the centroid of all Census Output Areas to all other Census Output Areas within Greater London. The maximum value within 50m of each station is taken in order to address boundary effects where a station may be just over the boundary in a large, rural OA with a low score, but immediately adjacent to a smaller, urban OA with a much higher score due to that OA's proximity to the station.
- 3.22 The resulting station scores provide a far more accurate and reasonable indication of its ability to accommodate sustainable patterns of growth than the frequency-based metric proposed in the draft NPPF. The resulting station scores are therefore preferred in the context of London's spatial strategy.

Determining well connected Green Belt land: station catchments

- 3.23 In order to understand the relative connectivity of surrounding areas and therefore the 'reach' of a sustainable location relating to a particular station a bespoke 'land connectivity' metric was developed to reflect the particular transport vision for Green Belt development. This was that it should be car light and walkable, given the connectivity offered by public transport and the expected uplift in facilities and services that new development would bring.
- 3.24 This combined the station ratings above with walking-distance catchments to assess the connectivity of surrounding land and define 'bands' with associated connectivity scores. Connectivity scores were assigned based on a combination of a station's connectivity level (derived from service frequency and access to jobs measures), and the proximity of

land to the station, using catchments broadly equivalent to a 15-minute walk. This catchment was then broken into bands equivalent to a 6-minute (or 480m – Zone A), 12-minute (or 800m – Zone B) and 15-minutes walking distances (or 1200m – Zone C). The resulting scoring matrix is set out in the table below¹⁷.

Table 3 - Land connectivity score matrix

Station score (based on frequency and access to jobs)	Distance to station: Zone A	Distance to station: Zone B	Distance to station: Zone C	Distance to station: Zone D
Very low	4	5	5	5
Low	3	4	5	5
Medium	2	3	4	5
High	1	2	3	5

3.25 This approach recognises that longer walking distances may still be appropriate where public transport connectivity is particularly strong. As result, an overall score of 2 may either be given to land immediately adjacent to a station with a medium level of connectivity (Zone A, <480m), or to land slightly further from a highly connected station (Zone B, <12mins/<800m). In effect, land close to moderately connected stations can therefore achieve similar connectivity scores to land located further from highly connected stations.

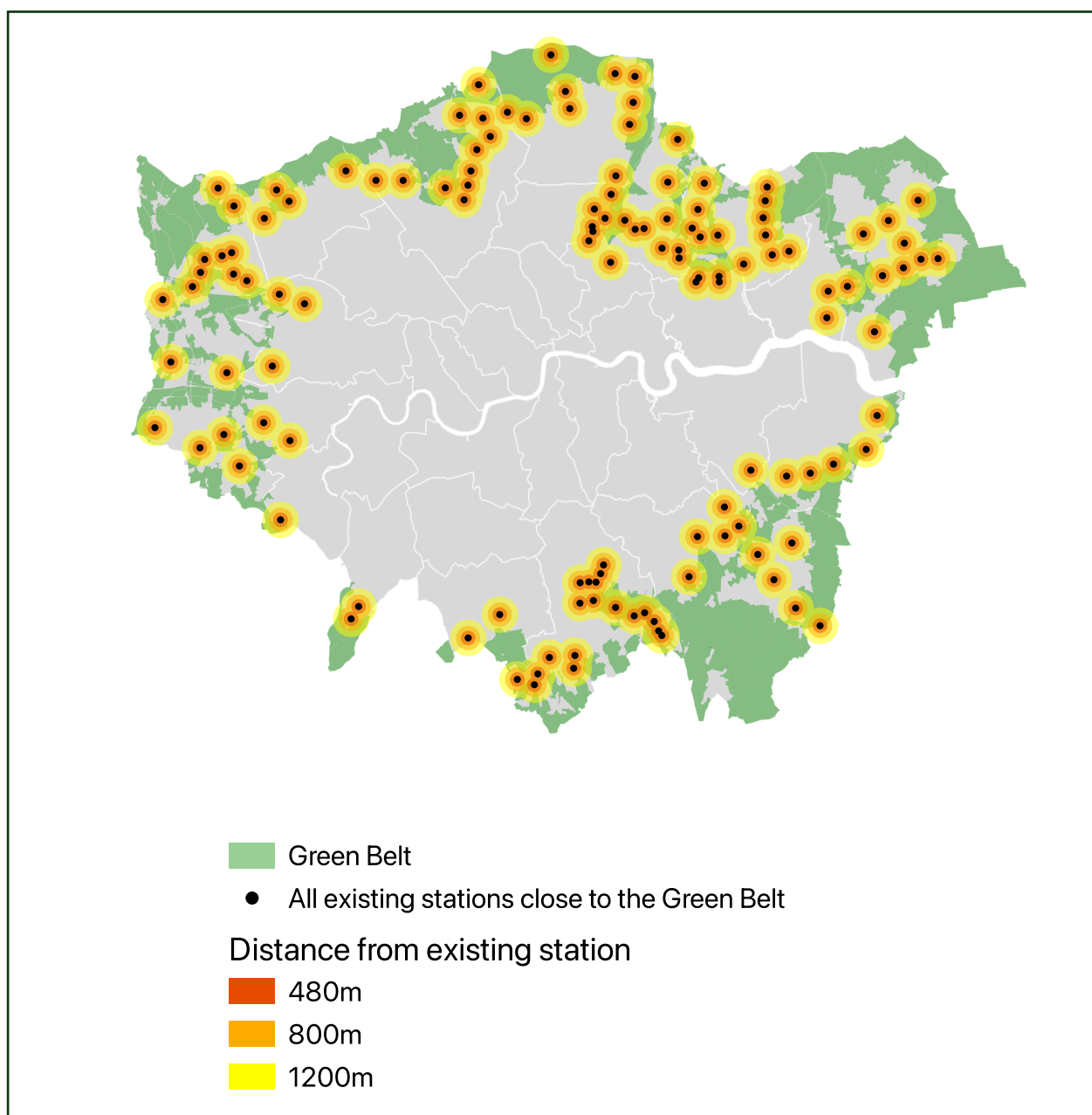
3.26 TfL's assessments concluded that only land with connectivity scores of 1-3 is capable of supporting medium-density, car-light residential development. Areas beyond a reasonable walking distance from stations, or those served by poorly connected stations, should therefore be excluded from consideration. Development in these areas could not

¹⁷ Buffering was used except where actual walk networks were present.

properly support day-to-day journeys by foot/rail and so would likely generate unsustainable patterns of development. Although this approach includes catchment areas that extend beyond the distances referenced in draft NPPF (800m), this is considered appropriate where stations provide very high levels of connectivity as is more common in the London context.

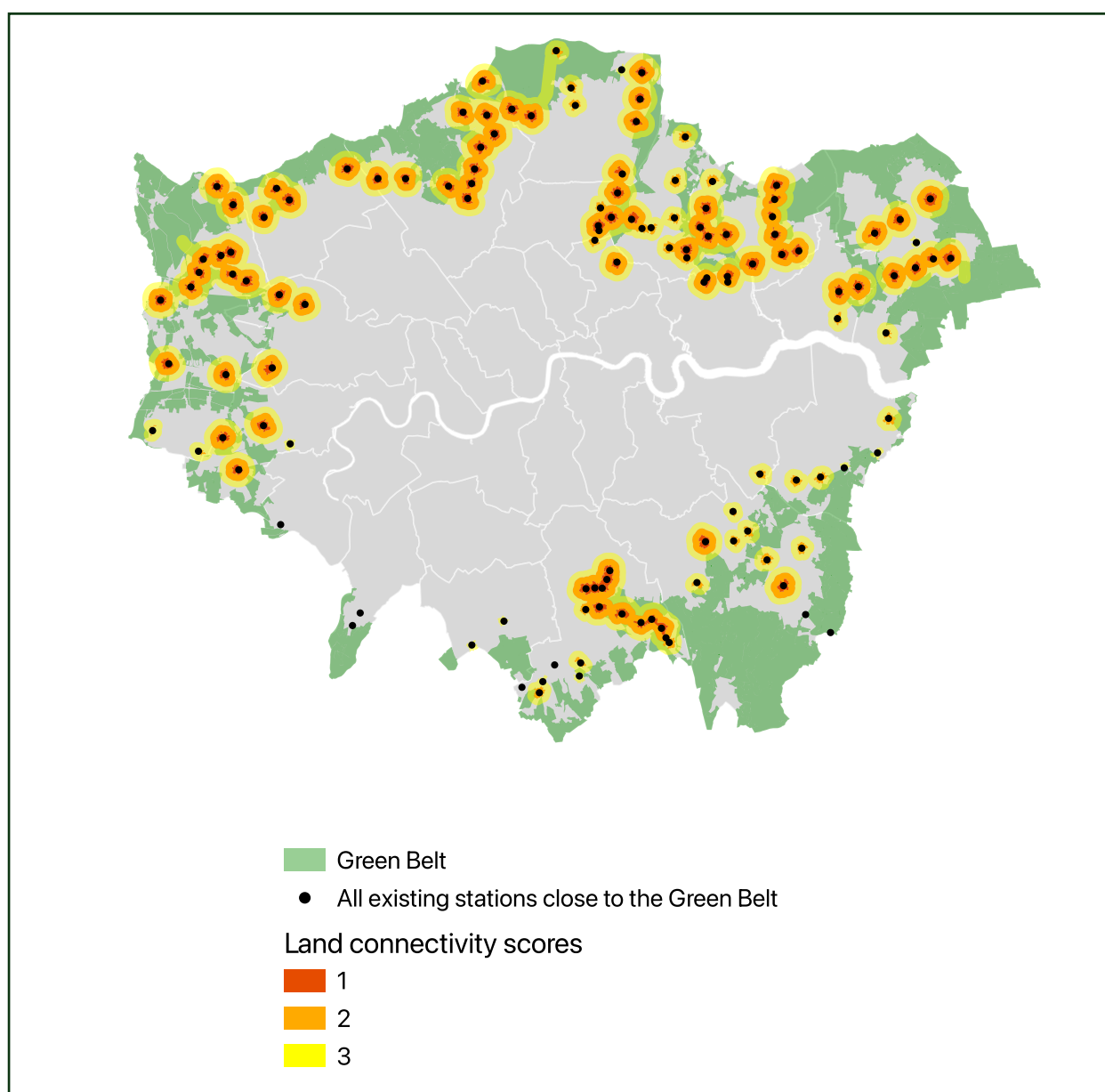
3.27 Figure 4 below illustrates the distribution of all stations assessed and the proportion of London's Green Belt falling within a catchment of 1200m from one of these existing rail stations.

Figure: 4 - All stations close to London's Green Belt land and distance buffers



- 3.28 Figure 5 below then shows how the application of the land connectivity analysis described in the sections above has greatly refined this search by illustrating the total distribution of land falling into scores 1-3. This provides an initial indication of the extent of Green Belt land that may be capable of supporting sustainable residential development.
- 3.29 This analysis formed the starting point for identifying broad locations for residential-led growth as part of an overarching spatial strategy. These new bands were then combined with the land connectivity scores calculated to provide a more precise estimation of the areas of well-connected land. The final modelling outputs from this stage is illustrated in the figure below. Areas shown in red, orange or yellow represent land with a land connectivity score of 1-3 based on the matrix above and represent the total land area that formed the basis of an 'area of search' to accommodate residential-led growth at critical mass scale.

Figure: 5 - Updated land connectivity analysis and areas of search



3.30 This analysis identified highly connected Green Belt land as a starting point, but it did not account for other characteristics that may affect a location's sustainability. These include:

- Presence of features which would physically preclude development on this land or make it unsuitable in principle due to particular social, economic environmental characteristics.
- Clustering of well-connected station areas, or scope for future rail improvements and hence potential for critical mass of growth to be achieved.

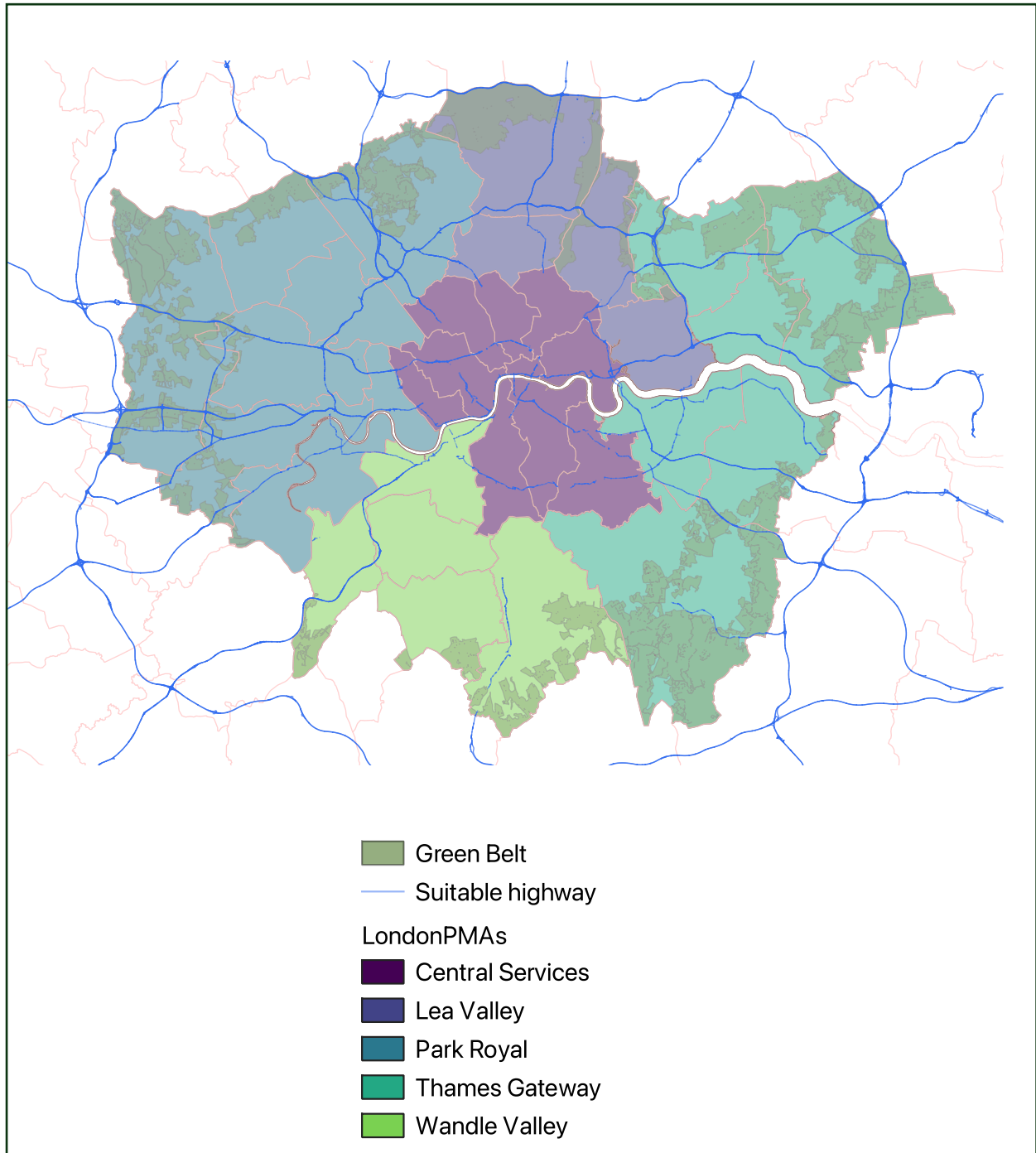
- 3.31 Even with these well-connected stations or stops identified, further analysis was therefore required to determine which of these stations or stops, and in what configuration would provide the optimal, most sustainable pattern of development. Only locations which were selected on the basis of this additional analysis were ultimately chosen to form part of the London Plan's spatial strategy and be considered to represent sustainable locations, on the basis of the optimal distribution of growth. The steps taken to determine this are set out in chapter 4.

Sustainable locations criteria -- Industrial, storage and distribution

- 3.32 As with residential development, transport connectivity is a key factor in determining suitable locations for industrial, storage and distribution uses. However, whereas housing is primarily reliant on public transport, these uses depend on efficient access to the roads which are highly suitable for freight given limited railhead locations and capacity and dispersed onward journeys. Without a spatial strategy response in the London Plan, poorly located development could result in major adverse strategic impacts of cumulative strategic significance, on both in terms of the capacity of the existing road network, road safety and the environment, together with environmental impacts such as (noise, air quality) and public safety.
- 3.33 Proximity of land to Motorways and the Transport for London Road Network (TLRN) therefore provides an effective starting point for identifying suitable locations for industrial storage and distribution growth. However, TfL analysis of the TLRN shows that some sections of the network are better placed than others to accommodate additional freight traffic. Analysis was therefore undertaken to identify sections of the TLRN, as well as other roads identified as having both the high suitability rating and high flow rates needed to accommodate additional HGV and LGV movements. Once these sections were established, further analysis was undertaken to map all junctions within these suitable sections of the road network. Junctions with suitable capacity were used to avoid assuming the need for new junctions which could considerably undermine viability, delay scheme delivery and cause major disruption. The resulting sections of the road network, SRN and existing junctions with these sections are illustrated in the figure below. The

land identified around these strategic junctions formed the basis of the initial 'areas of search' for sustainable locations for potential industrial growth.

Figure: 6 - Sections of the road network identified



3.34 Green Belt land with good access to these strategic junctions was then assessed to identify areas with potential to accommodate industrial development. A range of search distances was tested to understand how different catchments affected the quantity and distribution of land identified, as will be detailed in chapter 4. This analysis found that a

2.5 km buffer around suitable junctions provided the best balance between land availability and distribution of capacity across London's property market areas.

- 3.35 Green Belt land with good access to these strategic junctions was then assessed to identify areas with potential to accommodate industrial development. A range of search distances was tested to understand how different catchments affected the quantity and distribution of land identified, as will be detailed in chapter 4. This analysis found that a 2.5 km buffer around suitable junctions provided the best balance between land availability and distribution of capacity across London's property market areas.
- 3.36 However, transport connectivity alone does not determine suitability for development. As with residential growth, further assessment was required to consider wider planning, environmental and capacity considerations before identifying potential broad locations for growth and define sustainable locations more precisely. The approach taken to determine the potential suitability and capacity within this resulting area of search is also detailed in chapter 4.

Sustainable locations criteria - Data centre

- 3.37 Data centres are highly intensive uses in regard to utilities, in particular water and electricity, and are also subject to their own spatial constraints in terms of the availability of digital connectivity infrastructure (latency). In response, the draft London Plan includes policy criteria, informed by the GLA's evidence base and engagement with infrastructure providers, to guide the identification of suitable locations. These criteria require consideration of utility capacity, opportunities for clustering and the potential for heat recovery in the search for suitable sites. These should be identified by Local Plans following collaboration with the GLA, utility providers and neighbouring boroughs. Given these strategic policy measures, identification of suitable separate broad locations for growth within the London Plan is not considered necessary, as many may well relate to other residential or industrial BLGs or existing built-up areas, and the quantum of need that cannot be met on brownfield land is unclear.
- 3.38 Moreover, unlike housing and industrial uses, data centres are less dependent on transport connectivity once operational and serve markets that are not necessarily tied to a specific geographic area. In many respects they are more likely to have greater

locational choice, and dispersal per se is not problematic. As such previously developed and grey belt land may be more likely to be suitable for data centre use given it may be more likely to be close to places where waste heat can be used. Instead, it is more important to safeguard land in the most well-connected locations for housing and industrial uses (while allowing for data centres at their margins). This supports the NPPF's sequential approach while reducing competition with land required to meet London's most pressing development needs.

- 3.39 These principles are reflected in draft Policies GLE3 (Data Centres) and PV7 (Sustainable Development and Enhancement of the Green Belt). Taken together, they provide an appropriate framework for managing future data centre development in the Green Belt. Given the absence of a quantified development requirement and the effectiveness of a criteria-based approach, no further spatial response within the London Plan is considered necessary.

Sustainable locations conclusion

- 3.40 National policy requires Green Belt release to prioritise grey belt where exceptional circumstances exist. However, this sequential approach is explicitly dependent on the requirement to promote sustainable patterns of development. The NPPF, associated guidance and recent appeal decisions make clear that grey belt status alone does not determine suitability for development. Considerations such as transport connectivity and the ability to support sustainable growth remain critical and may outweigh the fact that land meets the grey belt definition.
- 3.41 To inform the London Plan, the GLA commissioned the first consistent London-wide Green Belt Assessment. The study provides a robust evidence base on the performance of Green Belt land and identifies areas that may meet the grey belt definition at a strategic scale. The findings demonstrate that potential grey belt is unevenly distributed and often fragmented into smaller, disconnected parcels. While this evidence is an important consideration, it does not assess development suitability and must be considered alongside a much wider range of planning, environmental and infrastructure factors.
- 3.42 Evidence indicates that a spatial strategy based primarily on the release of grey belt land would not support sustainable development outcomes. The distribution of potential grey

belt does not generally align with areas of high transport connectivity, strategic infrastructure, or locations capable of accommodating the critical mass of development needed to support infrastructure investment and comprehensive master planning. Nor does grey belt status account for the many environmental, recreational, ecological and cultural functions that Green Belt land may perform.

- 3.43 For residential development, the London Plan therefore prioritises Green Belt locations with high levels of public transport connectivity, around well-connected rail stations capable of supporting medium-density, car-light development. Detailed analysis by the GLA and TfL identified a limited proportion of London's Green Belt that meets these criteria, providing an 'area of search' and the basis for identifying broad locations for residential growth. This approach seeks to maximise housing delivery while minimising land take, car dependency and wider environmental impacts. The development of these areas of search into identified broad locations for growth is described in the next chapter.
- 3.44 For industrial storage and distribution uses, access to the Strategic Road Network is the primary consideration. Analysis undertaken by TfL identified sections of the network capable of accommodating additional freight movements and formed 'areas of search' for this land use and the basis for identifying suitable broad locations for growth for future storage and distribution uses. This approach enables industrial development to be directed towards locations that minimise impacts on existing communities while supporting London's strategic economic needs. The next steps in the identification of BLGs is also set out in the next chapter.
- 3.45 A different approach is adopted for data centres. While the sector is expected to grow significantly, development suitability is driven primarily by access to utilities and digital connectivity infrastructure rather than transport connectivity. The draft London Plan therefore relies on criteria-based policies rather than a spatial response, while supporting opportunities for waste heat recovery and directing development away from locations needed for housing and industrial growth and onto grey belt.
- 3.46 Across all land-uses, overall, the evidence demonstrates that a sustainable, infrastructure-led approach provides a more appropriate basis for Green Belt release than reliance on grey belt status alone, ensuring that any future releases align with the London Plan's wider spatial, environmental and economic objectives. Grey belt is nonetheless incorporated in this approach where sustainably located in relation to the use in question.

4 Translating definitions into a proactive search for suitable capacity

- 4.1 As established in the previous chapter, for both residential and industrial storage and distribution, there remains a need to further refine the well-connected ‘areas of search’ identified and assess their capacity to meet the housing and industrial needs identified. This must consider the optimised distribution, pattern and quantum of growth, and the degree to which unmet needs may be reasonably accommodated in the Green Belt. The resulting spatial pattern must reflect NPPF consideration and align with the London Plan’s core Good Growth objectives. This includes accounting for anticipated strategic impacts. This chapter details how these areas of search were refined to provide more detailed estimates of potential land supply quantum for residential and industrial, storage and distribution.

General approach

- 4.2 For both land uses, a broadly consistent methodology has been applied, with adjustments to reflect their specific requirements. This begins by identifying areas of search based on the well-connected Green Belt locations described in the previous chapter. Spatial constraints that would preclude development are then applied to establish a ‘gross’ supply of potentially suitable, well-connected land. Further allowances are made for infrastructure, environmental features and other constraints are then applied to derive a net supply of potentially suitable, well-connected land. For residential development, average density assumptions have then been applied to estimate housing capacity. For industrial, storage and distribution uses, the net land supply itself is retained as the primary measure to align with evidence on land requirements.
- 4.3 Once the maximum potential supply had been established, iterative testing was undertaken to assess whether land could be grouped into clusters of sufficient scale to justify identification as broad locations for growth (BLGs). This process also considered the strategic impacts of release in different locations to identify the most effective spatial distribution. The detailed methodology for each land use is set out later in this chapter.

General approach limitations

- 4.4 As previously noted, the London Plan does not allocate land or propose specific Green Belt boundary changes. The purpose of this analysis is to identify broad areas where future releases should be focused and to estimate the scale of development they may accommodate. This ensures that the Plan's spatial strategy is based on a robust, consistent and borough boundary-blind approach. The analysis relies primarily on using Geographic Information Systems (GIS) based modelling that works with land rather than sites. And, given its strategic nature, it has not involved the detailed and site-specific assessment that will be required at the local level to progress the associated green belt adjustments and site allocations. While the most up-to-date data available has been used, the findings remain dependent on geospatial information supplied by boroughs, statutory consultees and government departments and should be refined through future local studies.

Embedded general design approach.

- 4.5 The NPPF requires major residential development in the Green Belt to satisfy the 'Golden Rules'. In London, these include delivering 50 per cent affordable housing, providing improvements to local or strategic infrastructure, and creating or enhancing green space and public access to it. Alongside the requirement to achieve at least 10 per cent Biodiversity Net Gain, these establish a baseline set of expectations for future development and do not require further repetition within the London Plan.
- 4.6 Beyond these national requirements, the London Plan seeks to ensure that major residential development in the Green Belt follows compact, landscape-led design principles that integrate and enhance green infrastructure. These principles were a clear vision from the start of the work, rooted in the plan's Good Growth objectives, including the aim of minimising Green Belt release and ensuring liveable, vibrant places with viable local services. They reflect both the need to avoid low-density, car-dependent forms of development and the Mayor's wider environmental ambitions.
- 4.7 Some of these principles similarly apply to industrial, storage and distribution development. Although the Golden Rules do not apply, it is also assumed that such development should contribute to Green Belt enhancement and adopt a landscape-led approach that responds sensitively to the surrounding landscapes. This is particularly

important where development may affect features such as mature woodland or existing canopy cover. Given the larger grain and plot sizes of such development, sufficient land should also be retained and enhanced to mitigate environmental impacts and support biodiversity.

- 4.8 Planned releases can also support strategic Green Belt enhancement, as will be discussed later in this chapter. This includes improvements to land surrounding broad locations for growth and the opportunity to pool contributions towards larger-scale green infrastructure projects, such as regional parks, delivering benefits for both existing and future communities.
- 4.9 These principles have informed the overall approach to identifying development capacity. In the case of residential development, they will require a shift in typology towards a new model of higher-density, but landscape led and sustainable transport-oriented growth in Green Belt locations. This will entail significant place-making and market shaping. However, this approach is considered both reasonable and necessary to ensure that future development aligns with the London Plan's wider objectives.

Residential land search methodology

Primary constraints

- 4.10 The first stage of the proactive search applied a set of spatial constraints to the areas of search identified in Chapter 3. These constraints included statutory and non-statutory designations, physical barriers and other factors that would either preclude development or create a strong presumption against it directly or indirectly (e.g. due to the mitigation burden). For the purposes of this assessment, these are termed 'primary constraints'. The list is intentionally limited to constraints that would clearly prevent development in principle, irrespective of local circumstances.
- 4.11 The primary constraints include environmental designations such as Sites of Special Scientific Interest (SSSIs), certain heritage assets such as Registered Battlefields, and health related constraints such as areas affected by high levels of airport noise which are also likely to reflect operational constraints. They also include land that is physically unsuitable for development, such as water bodies and strategic highway infrastructure, as well as existing developed areas (including housing, commercial and infrastructure uses)

where land ownership, existing use values and resulting viability considerations would be likely to constrain redevelopment in what is already a challenging context.

4.12 To develop the final range of primary constraints, scenarios were tested iteratively to understand their effect on both the quantity and distribution of potentially suitable land. These can be grouped into three broad approaches, ranging from more protective to less protective. In each case, land affected by the selected constraints was excluded from the potential supply. The table below summarises the principal approaches tested.

Table 4 - Constraints scenarios options tested

Alternative approach	Constraints included
Maximum constraints (most protective)	• Airport Noise 69dB+ • Ancient Woodland • Areas of Outstanding Natural Beauty • Built-up land • Flood risk (low, medium and high risk) • Local Nature Reserves • National Highways Operational Land • National Nature Reserves • Public Open Space (designated and undesignated) • RAMSAR • Registered Battlefields • Registered Parks and Gardens • Sites of Importance for Nature (Borough Level 1) • Sites of Importance for Nature (Borough Level 2) • Sites of Importance for Nature (Metropolitan) • Sites of Special Scientific Interest • Special Areas of Conservation • Special Protection Areas • Suitable Alternative Natural Greenspace (SANG) sites. • TfL Highway Authority Land • Water features

Intermediate constraints	All maximum constraints with the following amendments: • Flood risk zones (medium and high risk only) • Registered Parks and Gardens, amended to remove golf courses from this constraint. • Sites of Importance for Nature Conservation (Borough Level 1), amended to remove golf courses from this constraint. • Remove Sites of Importance for Nature Conservation (Borough Level 2) as constraints.
Minimum constraints (least protective)	All maximum constraints with the following amendments: • Remove all grades of Sites of Importance for Nature Conservation as constraints. • Flood risk exclusion zones (high risk only) • Public open space (designated only)

4.13 The most restrictive option applied a broad range of environmental, heritage and policy constraints. While this provided the highest level of protection, it was discounted as unreasonable because it excluded significant areas of land where development may be acceptable in principle, subject to mitigation or site-specific assessment. Examples included areas of lower flood risk and sites subject to lower-tier ecological designations (SINC Borough Levels 1 and 2).

4.14 An intermediate approach was subsequently tested, applying a more limited set of constraints while retaining protections for the most sensitive and nationally significant assets. This approach removed lower flood risk areas from the constraint layer, reflecting that NPPF policy may allow development where flood risk can be appropriately managed. It also included two specific bespoke adjustments relating to golf courses. Under this approach, all Borough Grade 2 SINC or any Borough Grade 1 SINC which covered golf courses were not excluded. This reflected the potential for exceptional circumstances, biodiversity mitigation and landscape-led master planning to address impacts where development benefits justify release. In the case of golf courses, consideration was also given to their intensive management, primarily turfgrass composition, limited public accessibility and potential opportunities to achieve biodiversity enhancements and

Biodiversity Net Gain through redevelopment. A similar approach was also applied to the limited number of golf courses designated as Registered Parks and Gardens. These were not treated as an absolute constraint on the basis that carefully planned development could, in some cases, avoid harm to their significance and development may help with restoration. This does not imply that such sites are suitable for release, only that they should not be excluded automatically at a strategic level.

- 4.15 A less restrictive approach was also tested, based on the minimum reasonable set of primary constraints. This removed all SINCs from the constraint layer, together with areas of medium flood risk and open spaces which are not formally designated. While this generated a larger potential land supply, it was discounted because it substantially weakened environmental protections and increased the likelihood of significant adverse impacts. Although it identified additional development opportunities, the potential harms or mitigatory burdens (e.g. costs of biodiversity net gain) were considered to outweigh the benefits of the increased supply. It was not therefore considered a reasonable alternative.
- 4.16 The intermediate approach was taken forward in the methodology as striking an appropriate balance between protecting the most sensitive assets and identifying a realistic supply of potentially suitable land. It also produced a less fragmented pattern of land around well-connected locations, improving opportunities to form coherent clusters capable of supporting broad locations for growth.

Gross / net land supply

- 4.17 Once the gross supply of potentially suitable, well-connected land had been identified, a further discount was applied to estimate the net land supply available for residential development. This reflects the need to accommodate infrastructure, supporting uses, green infrastructure, biodiversity enhancements and site-specific constraints not captured within the primary constraints layer. It also allows for the retention of important landscape features and habitats and provides flexibility to support place-led master planning and integration with the surrounding environment.
- 4.18 Two gross-to-net scenarios were tested to establish a range of potential developable land for residential. These were also assessed alongside different density assumptions to understand how alternative forms of development could affect overall capacity and

support the landscape-led approach promoted through the NPPF Golden Rules as described later in this chapter.

- 4.19 The first scenario assumed that 70 per cent of the gross land supply would be available for residential development, with 30 per cent assumed to be reserved for infrastructure, supporting uses and environmental mitigation. The second assumed a 50:50 split, providing greater flexibility but lower efficiency. These allowances are additional to the integrated local scale incidental green infrastructure expected to be incorporated within residential neighbourhoods themselves, for instance to accommodate public realm, doorstep accessible green spaces, play space and active travel routes. Together, the scenarios establish upper and lower estimates of potential supply of developable land for residential uses, however ultimately the 70:30 split was selected as most in line with the Good Growth objective of making best use of land.
- 4.20 These assumptions are informed by case study analysis and testing. However, the appropriate gross-to-net ratio for individual locations will ultimately need to be determined and tailored through detailed design-led assessments and master planning at the local level.

Residential design parameters

- 4.21 Beyond the general design approach, it was important to consider other factors that needed to be built into the methodology in order to ensure that the assessment of capacity adequately reflected residential-specific components of the expected compact, landscape-led approach. In doing so, a working concept of compact, landscape-led urbanism was developed, building on the initial vision referenced in Chapter 1. This work sought to ensure that density assumptions were informed by appropriate considerations of urban form, dwelling mix and market delivery linked to wider plan objectives and deliverability considerations.
- 4.22 It is a well-established planning principle that major residential developments must provide a range of housing types and tenures to meet different needs and support choice and diverse, inclusive communities. A varied housing offer can also support faster build-out rates by attracting a wider range of developers and broadening market demand. Both are key considerations in accelerating market absorption and rate of delivery. Therefore, it

is critical that proposed densities optimise capacity whilst supporting this rich typological diversity to meet market need and policy objectives.

- 4.23 In terms of scale and massing, the parallel work on the Optimisation Framework (explained in the SHLAA) recognises that medium- to high-density mid-rise development represents a highly efficient, fully optimised and appropriate model for well-connected locations in London. This is an approach which is also indicated to have broader support amongst design commentators and the public¹⁸, and is also compatible with net zero objectives given there is less reliance on steel¹⁹. Such development can achieve high levels of housing delivery while maintaining good design quality, supporting a mix of housing typologies - such as mansion blocks, stacked townhouses, and perimeter blocks - and remaining attractive to a wide range of developers. In many cases, average net densities of around 100 dwellings per hectare can be achieved without relying on high-rise buildings.
- 4.24 This form of development can also offer viability advantages. Buildings above six storeys are subject to additional regulatory requirements, including the need for second staircase provision, which can significantly increase construction costs. The GLA's viability evidence notes that, as a result, there is a trend broadly observing a significant viability gap for buildings just over the threshold i.e. 7-10 storeys. This is where the reduced saleable floor area and increased build costs fail to be offset by the additional revenue, driving up building height until such an offset can be reached. Mid-rise schemes therefore often provide a more efficient balance between development capacity and financial viability.
- 4.25 Consideration must also be given to preserving the openness of the Green Belt, unless sites utilise only grey belt. To preserve this openness, development has conventionally significantly tapered down in scale, massing and density affecting land use optimisation. However, in well-connected locations, openness can instead be maintained through design-led approaches, including compact building footprints, careful siting and massing, varied building forms and the integration of landscape and green infrastructure.
- 4.26 A more compact urban form also supports the long-term adaptability of London's edge. The NPPF (2024) recognises the essential need for safeguarding land to meet longer-

¹⁸ For instance, see the London Assembly's report: *Between skyscrapers and semis: London's missing mid-rise housing*, March 2026, [available online](#).

¹⁹ For instance see *High Density, Low Rise, Zero Carbon* - London Festival of Architecture, 2021 [online](#)

term development needs that stretch beyond the plan period (Paragraph 149).

Safeguarding land itself is insufficient without futureproofing the edge condition which preserves the potential for integrated urban extensions that may need to be unlocked in future.

- 4.27 Overall, this combination of considerations makes mid-rise, mixed typology, tenure and dwelling size, mixed use development that integrates employment and infrastructure particularly well-suited to London's growth needs. Whilst historically the national policy towards Green Belt release has meant that this approach has not, generally, been applied to greenfield developments, in the context of making best use of London's well-connected locations and the scale of the growth challenges, they are logically and necessarily applicable.
- 4.28 An extension of this concept was thinking on critical mass that was established particularly with advice from TfL regarding transport service viability. This recognises that infrastructure investment, particularly in public transport, requires development/catchment population of sufficient scale to support business cases (and hence delivery) and long-term operational viability. It is also relevant from a place-perspective, recognising that a concentration of people within an area contributes to vitality and viability of shops, facilities and services that make a place liveable and successful.

Case-studies analysis and density benchmarking

- 4.29 Having established the design concept, a review of comparable development precedents was undertaken to inform appropriate density assumptions. The initial search focused on schemes within London, reflecting similar transport connectivity and market conditions. While most examples were brownfield developments, owing to the longstanding policy of resisting Green Belt release, they remain relevant to well-connected Green Belt locations on the edge of the urban area. To supplement these examples, the assessment also considered recent sustainable urban extensions in outside of London, which provide relevant greenfield precedents delivered through strategic Green Belt release. Annex C summarises the case studies reviewed and their key characteristics.
- 4.30 The case studies demonstrate a broadly consistent pattern of development. Most comprise low- to mid-rise neighbourhoods with a diverse mix of housing typologies and a substantial proportion of family-sized homes (3+ bedrooms). The principal area of

variation is density, which ranges from approximately 50 to 160 dwellings per hectare. Lower-density schemes typically feature more generous layouts, greater levels of private parking and a stronger reliance on detached or lower-rise housing forms. Higher-density schemes tend to adopt more compact layouts, mid-rise typologies, lower levels of car parking and more efficient parking arrangements, such as on-street provision or shared parking courts. These approaches allow land to be used more efficiently while maintaining a high-quality residential environment.

4.31 Four distinct bands of average net density emerge from the precedent analysis summarised in Annex B. Although the diversity of contexts, planning approaches and public transport provision means the relationship is not perfectly linear, a clear correlation is evident: as developments shift from low-density, car dependent suburban formats towards higher density, car lite urban formats, average densities consistently increase. This overarching trend, and bands of net density by dwellings per hectare (dph) is summarised below.

- **50 to 70 dph** – lowest density, mostly house typologies, typically non-London locations, mainly car-based, access to rapid bus stops or train stations.
- **80 to 90 dph** – moderate density, mix of house, maisonette and apartment typologies, mix of London and non-London locations, generally car-lite, access to rapid bus stops or train stations.
- **120 to 130 dph** – high density, mostly stacked maisonette and apartment typologies, mix of London and non-London locations, generally car-lite, access to rapid bus stops or train stations.
- **150 to 160 dph** – highest density, mostly apartment typologies, mostly London locations, car-lite or car-free, access to highly connected train stations.

4.32 Collectively, the case studies demonstrate that successful placemaking is achieved through a mix of development types rather than a single housing model. A varied urban structure supports housing choice, market absorption and community diversity while enabling higher overall densities. The evidence therefore suggests that optimising capacity is best achieved through a balanced combination of housing typologies, densities and urban forms, rather than reliance on any single development approach.

4.33 Having established density ranges from the review of case studies, the next stage was to test and identify an appropriate density bands for estimating capacity in the London context. At this strategic level, the assessment did not attempt to replicate the detailed

master planning that would be required for individual broad locations for growth. Instead, it applies a consistent methodology to provide a robust starting point for future local studies and to inform housing capacity assumptions.

- 4.34 As with the constraints assessment, a range of density scenarios was tested to understand their effects on spatial patterns of growth and overall capacity. Different density assumptions were applied across the three land connectivity bands identified in Chapter 3, reflecting the principle that better-connected locations should support higher densities. While a number of iterations were modelled, they can be grouped into three broad scenarios: prevailing typologies, precedent-based typologies and high-ambition typologies. The table below summarises the density assumptions for each scenario, with average net densities stated in dwellings per hectare (dph).

Table 5 - Typology scenarios density bands tested.

Land connectivity score band*	Prevailing typologies net densities (dph)	Precedent typologies net densities (dph)	High ambition typologies net densities (dph)
1	60	160	300
2	40	130	250
3	20	90	175

**As described in chapter 3.*

- 4.35 The prevailing typology scenario tested a pattern of development broadly aligned with existing suburban forms. Although the densities modelled exceed those typical of many outer London suburbs, they still primarily reflect schemes characterised by housing-led layouts and relatively high levels of car parking. While useful in establishing a lower capacity scenario, this approach was discounted as incompatible with plan objectives because it would make inefficient use of scarce, well-connected land and reinforce car-dependent patterns of development. The results demonstrate that, without clear expectations around density and land optimisation, Green Belt release would make a

more limited contribution towards addressing London's unmet housing needs or else need to be very extensive with other adverse impacts.

- 4.36 Similarly, the high-ambition scenario was useful in testing the upper limits of potential capacity but was ultimately considered inappropriate given wider plan objectives. Achieving these densities would generally require a much greater proportion of flatted, taller and mixed-use development, with a high volume of non-residential uses needed to sustain emerging communities at this scale. This level of density becomes less efficient in terms of overall residential capacity, instigating diminishing returns by resulting in fewer opportunities for family-sized housing and placing greater demands on supporting infrastructure. While it would maximise theoretical capacity, it would be less likely to deliver the balanced and sustainable communities sought by the London Plan.
- 4.37 As such, the precedent-based density scenario was identified as the preferred approach to be incorporated into the methodology. Drawing on the case studies summarised above, it supports compact, mid-rise development capable of delivering high densities while accommodating a broad mix of housing types, including family-sized homes, considered essential to creating sustainable, mixed and resilient communities. This scenario provides the most effective balance between optimising land use, supporting sustainable development, place-making and market delivery, and creating mixed, resilient communities. It also allows sufficient flexibility for a range of building typologies and local design responses. This density gradient was applied to the net land area but nuanced with some consideration of high-level emergent design concept-testing/capacity work in a number of areas.

Future rail enhancements and quality bus link extensions

- 4.38 A final consideration in identifying locations for residential-led growth was the potential for future transport investment to improve connectivity and unlock additional areas of Green Belt land. This is relevant to longer-term growth requirements and the need to plan strategically for development beyond the current target setting and Plan periods.
- 4.39 To be sound, the London Plan must be based on reasonably plausible assumptions regarding infrastructure provision. Consequently, development targets and spatial strategy for the first 10 years of the Plan are informed only by transport schemes that are either funded or at an advanced stage of planning. Major transport projects, particularly

rail infrastructure, require substantial investment and long lead-in times. It is therefore unlikely that schemes not already committed and being progressed could support delivery within the Plan's target-setting period (first 10 years).

- 4.40 TfL's current Business Plan, covering the period until 2030, includes a range of investment programmes, including rail and Underground upgrades such as the metroisation of Great Northern rail, DLR extension, cycle network expansion, and improvements to roads and bus services²⁰. Planned increases in rail service frequency and accessibility in this period have been reflected in the assessment of well-connected locations described in Chapter 3. This has also included additional transport schemes that can feasibly be delivered within the first ten year period.
- 4.41 However, in the context of Green Belt release the NPPF also requires authorities to consider longer-term development needs beyond the Plan period. Both the current NPPF and proposed amendments to it support the identification of safeguarded land where future development may be required. In this context, it is important to consider how potential future transport investment could expand the extent of well-connected land including, where necessary, Green Belt land and influence the identification of broad locations for growth.
- 4.42 To inform this assessment, TfL undertook a series of workshops and technical reviews of potential medium and long-term transport improvements that could enhance London's Green Belt connectivity. Medium term (conceptual) improvements were defined as those which could plausibly be delivered within 15 years and cost in the range of tens to hundreds of millions of pounds and could include concepts such as the addition of new infill stations on existing rail lines. Long term improvements were defined as much higher ambition concepts which would be highly challenging, likely taking more than 15 years to deliver and/or potentially costing more than a billion pounds. This included the extension of rail lines into new areas of the Green Belt or the creation of new rapid transit services.
- 4.43 The initial work undertaken by experts within TfL identified a broad range of (conceptual) projects falling into one of the two categories above. High level analysis of these transport improvement concepts was then undertaken to consider:

²⁰ TfL Business Plan & Budget, Jan 2026, [available online](#).

- **Feasibility** – high level feasibility assessments to rule out concepts that were unlikely to be technically feasible or could not be brought forward within the expected timelines due to their complexity.
- **Network capacity** – the ability of the network to accommodate related assumed increases in the number of trains / trams and any associated frequency uplifts.
- **Prioritisation** – consideration of the value for money of the more feasible concepts based on the number of additional homes that this might unlock and potential connectivity benefits for the wider community.

4.44 The assessment of future rail investment identified 8-9 locations²¹ where new stations or upgrades to existing stations were individually reasonably plausible within the latter part of the Plan period (within approximately 15-20 years) and achieve the connectivity standards defined in chapter 3. This analysis can only be seen as determining which schemes might individually be technically possible and would require further development to determine actual feasibility together with consideration of which schemes may be prioritised for investment.

4.45 Further locations were also identified where upgrades could potentially be delivered over the longer term, subject to substantial strategic investment. These involved much more major projects, including potential major network extensions into new areas of Green Belt. If realised, these improvements could either increase the longer-term capacity of the initially identified clusters or unlock new areas. These potential schemes, including future stations, have therefore been considered when identifying broad locations for growth, recognising that development delivered during the Plan period may help strengthen the case for future transport investment. Again, this high-level analysis was intended only to highlight concepts that might be technically possible longer term. Not all of these concepts could be feasibly developed concurrently given the very significant costs, together with the technical resource burden to fully test and design such interventions.

4.46 Consideration was also given to the potential role of bus services and significant bus priority measures in improving access to well-connected stations and unlocking additional development capacity. All bus services play an important role in supporting development. However, dedicated bus priority measures along key corridors, with focused

²¹ Beyond year 20 there may also be additional reasonably plausible land associated with Crossrail 2, should that scheme be progressed. This is accounted for with the same safeguarding expectations for land that could be reasonably plausibly associated with 10–20-year transport improvements but has no estimates of capacity associated with it at this stage.

improvements to frequency, reliability and journey times, designed to provide fast and reliable links to key rail hubs, may be capable of actually extending the catchment of well-connected locations. TfL therefore also assessed the plausibility of such services, focusing on opportunities to provide direct, high-quality connections without reliance on mixed traffic conditions that could undermine journey times and reliability.

- 4.47 This work informed the development of a set of criteria defining the level of service and infrastructure required for express bus links to support growth. These criteria have been incorporated into the draft London Plan. The assessment identified specific locations where such services may be feasible in the 10 year period and which could unlock additional housing capacity, and others where such bus services could enhance other concept improvements longer term. These opportunities have also been taken into account when identifying broad locations for growth.

Residential broad locations for growth and anticipated capacity

- 4.48 Taking account of all of the principles, benchmarks and criteria summarised above and in chapter 3, the total potential residential capacity within London's Green Belt has been estimated. The figures below provide an illustration of how this sieving process was used to generate the gross land supply, and how density assumptions have been applied based on the land connectivity scores.

Figure: 7 - Green Belt land covered by primary constraints and well-connected land

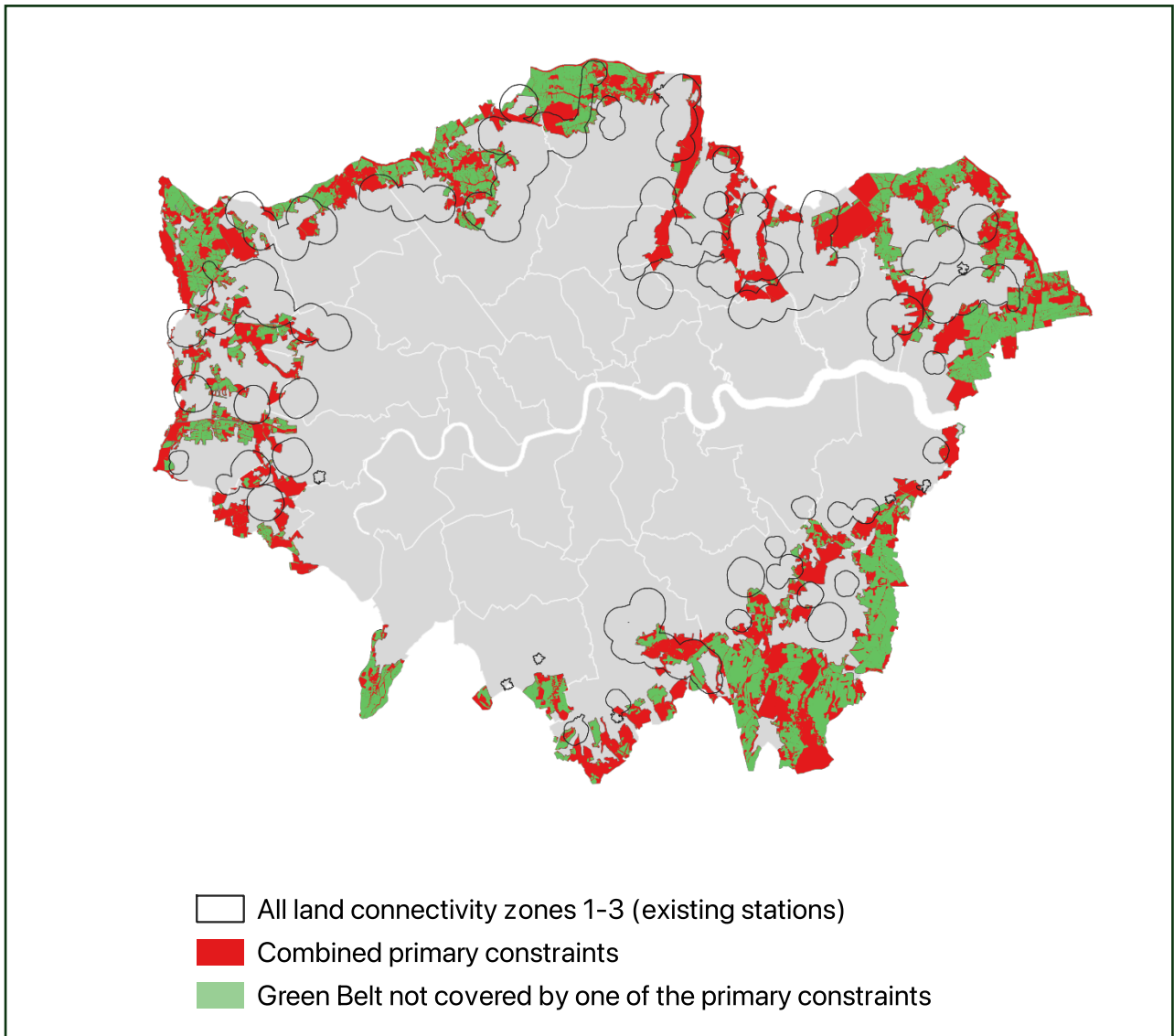
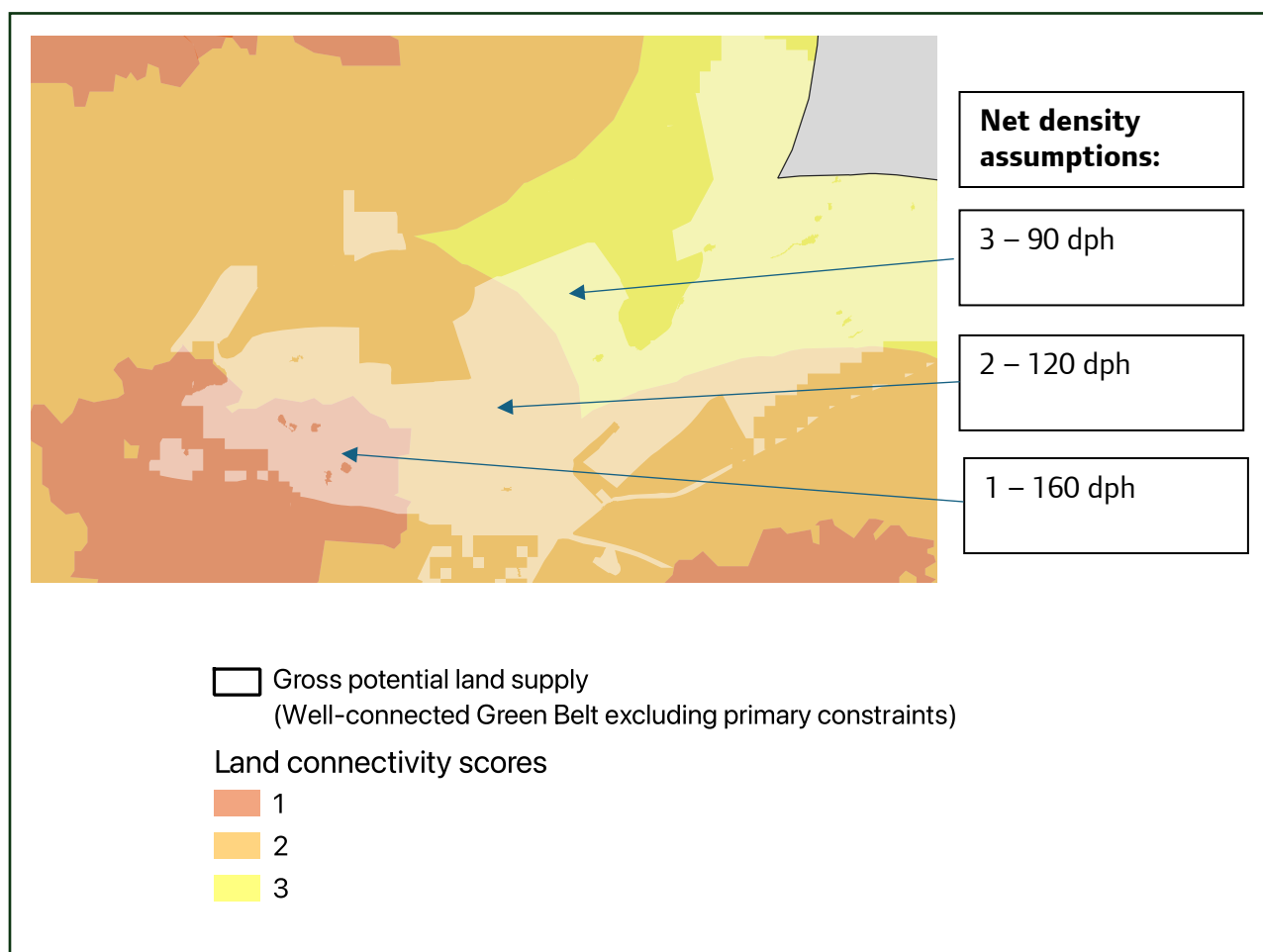


Figure: 8 - Illustrative example of application of net density assumptions according to land connectivity score



4.49 As shown in the figure above, this approach meant that density assumptions based on the precedent range could be applied accurately into distinct portions of the gross land supply that falls into differing land connectivity bands. Similarly, gross:net discounts were also applied individually to distinct portion of the gross supply falling into differing connectivity bands. This approach gives a more accurate indication of a reasonable hypothetical maximum capacity than using straight line buffers.

4.50 A summary of the resulting outputs from the London-wide search for total potential land supply and capacity is set out in the table below.

Table 6 - Initial land supply estimate outputs from London-wide proactive search for residential

	Area (hectares)	Percentage of total Green Belt
Total Green Belt land within Greater London	c. 34,750	100 per cent
Well-connected Green Belt (GB land with connectivity zones scores 1-3)	c. 6,200	18 per cent
Gross potential land supply for housing (well-connected GB land excluding primary constraints)	c.1,795	5 per cent

Table 7 - Maximum potential capacity (theoretical capacity) from all well-connected Green Belt land NOT ACCOUNTING FOR ACHIEVABILITY

Upper capacity estimate (based on higher gross:net assumptions)	148,011 units
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- 4.51 The figure above represents the total theoretical capacity were all areas of the gross land supply released, applying the same gross:net and density band assumptions. This is not, however, a realistic estimate of the developable capacity and further refinements were required.
- 4.52 This process was repeated to consider the potential capacity increases arising from medium- and longer-term transport investment. The potential uplifts were considerable, bringing in up additional land that could, in theory, provide capacity for up to approximately 175,000 homes longer term. It should be noted though that this is based on concepts only rather than worked up scheme detail, and while individually reasonably plausible it is unlikely that the total amount of capital investment necessary to unlock this total capacity concurrently would be feasible. Either way, these capacity figures are not relevant to the plan-setting period and are instead only an estimate of potential supply which could potentially be unlocked in the future.
- 4.53 The numbers in the tables above therefore represent the maximum ceiling of theoretical potential capacity for London's Green Belt based on existing, committed or reasonably plausible transport infrastructure that is likely to provide the desired level of connectivity

within the first 10 years of the Plan period. They include the calculation of capacity from all parcels of land which meet the initial suitability tests of the desk-based proactive search. Whilst this potential supply is already focused within a small proportion of the total area of London's Green Belt land, as will be described in the section on the formation of clusters, not all of this land and capacity can be justifiably part of the plan's spatial strategy.

- 4.54 This is primarily a result of the fact that much of this net supply is fragmented, with only small areas within a single station catchment area. Similar to the grey belt first approach rejected above, such a wide and fragmented distribution of growth would not provide a minimum critical mass of capacity in some locations necessary to support infrastructure enhancement. It would also spread planning and development (technical) capacity too thinly in respect of bringing forward the necessary infrastructure enhancements and mitigations, including utilities upgrades as well as transport.
- 4.55 Further consideration of how this net land supply could be refined into to form strategically significant broad locations for growth with a critical mass of growth potential is therefore needed.

Identification of station clusters and strategically significant broad locations for growth with critical mass

- 4.56 Taking the outputs from the London-wide modelling described above, areas of net land supply were grouped into logical station 'clusters' (or potential BLGs). Clusters that were fully contingent on medium or longer term transport investment and so are not of relevance for the first 10 year of the Plan, were removed from BLGs candidates (though their presence and potential for future capacity was a notable factor). Generally individual clusters would include the catchments of multiple stations, with some crossing borough boundaries, though in some cases a cluster may be formed from a single station. Across all clusters, the potential for bus corridors to improve land connectivity scores and unlock additional capacity was also considered.
- 4.57 Further analysis was then undertaken to understand the distribution of the identified land supply across theses cluster areas to determine the total potential capacity within each. The resulting range in capacity estimates is considerable: 30,000 homes within the

highest to less than 500 homes in the lowest (excluding the 4 clusters fully contingent on longer term investment).

4.58 Drawing on various sources of evidence and historic practice, a threshold for consideration of a residential-led BLG was then established based on a minimum threshold of a potential capacity of 3000 homes²². This considered previously established thresholds relating to Opportunity Areas in earlier London Plans; good practice advice on the minimum population needed to support key facilities²³; TfL advice about the scale of growth needed to justify infrastructure enhancements and service viability plus consideration of the number of clusters and associated infrastructure improvements that could reasonably be delivered concurrently.

4.59 Clusters with at least this capacity in the 10 year period were therefore defined as Broad Locations for Growth (BLGs). Others which had this capacity potentially longer term (primarily contingent on further transport investment) were defined as future candidate BLGs, with the 'candidate' denoting the further work needed on the transport investment concepts and other issues such as environmental mitigation strategies. Cluster areas with potential capacity less than 3000 were not taken forward into the plan. In total 10 BLGs are identified within London's Green Belt, with a further 8-9 potential future candidate BLGs identified. The next step was to consider an appropriate 10 year capacity for each.

Delivery rates and discounting

4.60 While all the BLGs identified within the London Plan had a minimum potential capacity of at least 3000 units, some had a much higher figure. However, as with the approach for

²² Note this is lower than the 10k number referenced in the Towards consultation which had been aligned with the Government's New Town definition. However, it was considered that this was more relevant for prioritising intervention at a national scale rather than denoting a strategically significant scale of change with critical mass in the London context, particularly given the stringent approach to connectivity and the reliance predominantly on existing transport infrastructure (rather than needing major new investment that would need to be justified). That said it is a minimum, and the cluster analysis showed that in many cases theoretical/longer term capacity was far greater.

²³ OAs have typically had 2500 or more homes capacity which alongside jobs denotes relative strategic significance; academics Barton, H et al (2021) in Shaping Neighbourhoods for Local Health and Global Sustainability advise a population of 7500 can support at least a local centre, primary school, pub, community centre, post office, and with proximity to existing residential areas are also likely to have access to health and secondary school facilities.

London's brownfield supply (as discussed in the SHLAA), it is not reasonable to assume that all of this capacity can be delivered within the first 10 years of the Plan period. This reflects a number of specific constraints that will realistically limit deliverability of particular sites and delivery of overall numbers in any one location.

- 4.61 To accommodate these factors a number of additional (phasing) discounts were applied to translate the potential capacity identified into a 10-year housing delivery target to be apportioned across the relevant boroughs, including:
- 4.62 Firstly, a three year lead-in time was established, such that BLGs are only assumed to deliver between years 4 – 10 of the plan period. This accounts for the need for there to be masterplan and plan-led responses developed locally to fully optimise each location, amend green belt boundaries, allocate sites and develop a supporting package of infrastructure expectations and commitments.
- 4.63 Secondly, the delivery rates thereafter have been capped at a maximum of 1000 units a year. This was justified as plausible as it sits between the high average annual rates of delivery in new towns such as Milton Keynes²⁴ and those observed in peak years in more recent new settlements with significant public sector interventions²⁵. Whilst this rate of delivery and market absorption remains highly ambitious, this assumption is considered reasonable in light of 50 per cent of units delivered being expected to be affordable. The GLA's draft London Plan Viability Study shows how in the Green Belt context, a high proportion of affordable may indeed stimulate delivery on the basis of the grant funding subsidy it attracts, combined with the diversification this provides. In addition, one BLG had been shortlisted for new town status, increasing the likelihood of public sector intervention. The Viability Study suggests various types of public sector support (in addition to affordable housing grant) may be needed to help address green belt viability challenges helping to accelerate delivery.
- 4.64 Finally, in addition to the above, predominantly where capacity was already 7000 or less, additional discounts (effectively rephasing beyond the 10 years) were applied to account for viability evidence regarding challenging sales values in particular locations, other known constraints on availability or achievability (such as High Speed 2 legal agreements)

²⁴ 900 on average over the past 10 years, see Milton Keynes Council annual housing monitoring data [available online](#).

²⁵ Around 600 a year - see work by Lichfields (2024) cited by the New Towns Taskforce [available online](#)

and where unknown, the likelihood that more detailed work would identify them. Viability discounts were a maximum of 20 per cent however to account for the likely impact of value-building through masterplan-led place-making and new build premiums, and the expected degree of (necessary high) levels of public sector intervention²⁶ and aforementioned affordable housing expectations. Generally, the position on availability is that while the work is entirely based on a proactive search, much of such land is expected to be under option. As such, the role of a strategic plan through highlighting the opportunity, should be to encourage owners to make it available.

- 4.65 Accounting for these assumptions, caps and discounts the overall adjusted expected developable capacity within the first 10 years of the plan is estimated at 56,100 homes. The distribution of this anticipated housing supply across the identified BLGs, together with a summary of the anticipated rail infrastructure improvement necessary to facility releases is set out within the table below.

Table 8 - Residential-led 10 year Green Belt BLGs

Broad location for growth	Adjusted BLG capacity estimate (units, within 10 years)	Assumed infrastructure improvements (beyond that accounted for in current TfL business plan)	Borough(s)
Crews Hill & Chase Park	7,000	Metroisation of Great Northern rail & bus corridor	Enfield / Barnet
Croydon-New Addington	5,600	N/A	Croydon
Dagenham	3,200	N/A	Barking & Dagenham / Havering
East of Ickenham	7,000	N/A	Hillingdon / Ealing

²⁶ See the draft London Plan Viability Study (2026)

Eastern Hainault Loop	5,400	N/A	Redbridge
Harold Park	4,000	N/A	Havering
Mill Hill & Barnet	7,000	Bus corridor	Barnet
Northwood	7,000	N/A	Hillingdon / Harrow
Upminster	6,000	Bus corridor	Havering
West Ruislip	3,900	Bus corridor	Hillingdon

4.66 Whilst this total of 56,100 is still short of the c.346,000 deficit identified in chapter 2; this is considered to represent the maximum reasonable extent (within the ten-year period) to which London's Green Belt can accommodate its unmet needs whilst still remaining developable and balanced against its wider strategic objectives. It is expected that a review of delivery against these estimates will be made, and targets updated at the point of review of the London Plan.

4.67 Further delivery from these BLGs is still expected to continue into the latter half of the plan period, until their capacity is realised in full. This may be supplemented by additional capacity in some cases if additional transport investment comes forward.

4.68 In addition, it is also expected that some of the potential future candidate BLGs may begin to deliver housing in the second half of the plan period should the necessary transport improvements be confirmed and get into delivery. It is difficult to assert that this is entirely plausible. However, if all BLGs including all (except Crossrail 2 dependent) future candidate BLGs were to deliver across this period at a maximum of 1200 units per annum, (allowing for gradual step up where appropriate) a total capacity of around 175,000 homes can be anticipated.

Industrial land search methodology

- 4.69 A similar proactive search was undertaken to identify suitable Green Belt land for industrial storage and distribution uses. This built upon the definition of sustainable locations established in Chapter 3, based on proximity to suitable junctions on freight suitable roads). The assessment followed the same broad methodology applied to residential development. This section therefore focuses on the additional considerations specific to industrial uses rather than repeating the full methodology.
- 4.70 As with residential development, land affected by the primary constraints described earlier in this chapter was excluded from the search area. However, unlike residential, additional exclusions were then applied to reflect the operational requirements of storage and distribution uses. These were based on site characteristics rather than formal land-use designations and were informed by available datasets and GIS analysis. The additional exclusions are summarised below:
- **Potential residentially suitable land:** To safeguard the limited supply of well-connected land for housing, all areas identified as having a residential suitability (according to the connectivity score) were excluded. This included both existing well-connected station catchments and areas that could become so.
 - **Topography – significant slope:** Large-scale storage and distribution uses are reliant on relatively flat sites. Whilst some minor regrading might be possible, areas with significant changes in level would be problematic and were therefore excluded, due to the likely viability, deliverability and environmental impacts of substantial earthworks. Due to London's topography, this was particularly relevant along parts of London's northern and southern Green Belt.
 - **Canopy cover:** Industrial development typically requires larger, courser grain and less flexible site layouts than residential development. Although existing vegetation may be retained around site edges and incorporated into landscaping schemes, extensive areas of established canopy cover can significantly constrain development layouts. Larger areas of canopy cover not already protected through primary constraints were therefore excluded.
 - **Minimum parcel size:** a minimum parcel size of 20 hectares was applied to exclude smaller, isolated areas incapable of accommodating a critical mass of strategically significant industrial, storage and distribution uses. This threshold was informed by the GLA's industrial evidence base and engagement with industry stakeholders.
- 4.71 Land calculated to fall within 2.5km of one of the identified junctions a suitable section of the network was therefore refined down to provide a gross supply of potentially

suitable land. As with residential development, a further discount was applied to derive a net developable land supply. This accounts for infrastructure provision, biodiversity mitigation, sustainable drainage, landscape enhancements, Green Belt improvements and other site-specific constraints not captured through the initial filtering process. A gross-to-net ratio of 50:50 was adopted, reflecting the need for a greater proportion of land to remain undeveloped in order to ensure that large-scale industrial development can be accommodated sustainably within a Green Belt context.

- 4.72 The resulting net land supply represents the maximum potential provision of suitable Green Belt land for industrial, storage and distribution use across London. However, the GIS-based assessment identifies a broad distribution of land parcels rather than a coherent spatial strategy.

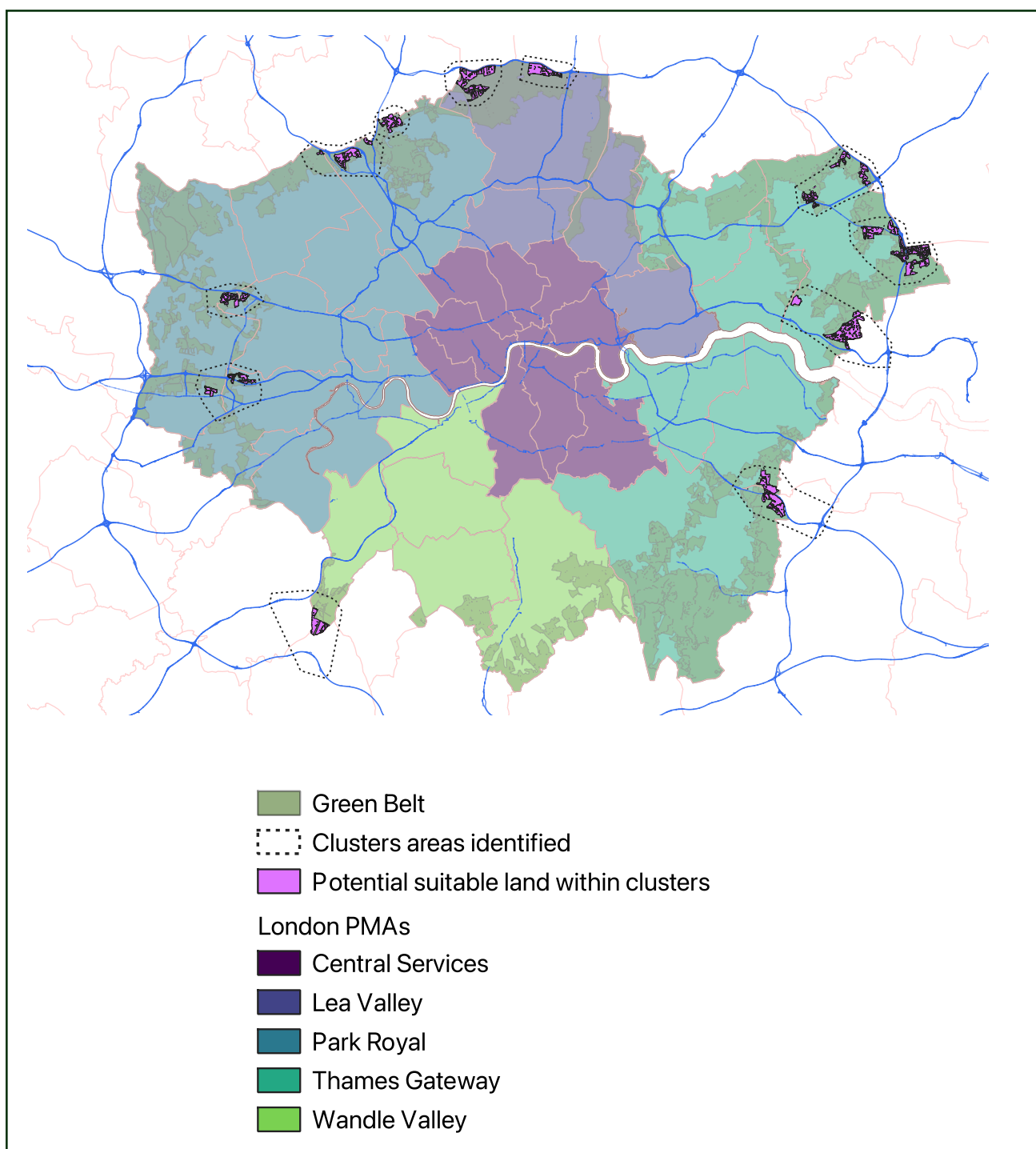
Refining suitable supply - identification of industrial broad location for growth potential

Identification of clusters of suitable land

- 4.73 The potential land supply identified through the methodology described above was therefore then consolidated into strategic-scale clusters capable of forming broad locations for growth (BLGs). This enabled the assessment to focus on larger, more coherent clusters while excluding areas only containing fragmented, isolated or non-contiguous parcels, for instance where a cluster had only a small number of parcels spread across a wide area.
- 4.74 In addition, as the initial GIS assessment identified sites based simply on distance from the suitable SRN junctions, some strategic parcels were not directly connected to such junctions. A further assessment was therefore undertaken to examine the practical accessibility of each parcel, considering route length, highway connections and the characteristics of potential access routes. Existing points of access were considered where possible, and where no suitable ingress/egress point existed, judgement applied about the likely most feasible location and routing to form a new access point. In turn, these where necessary were refined through the lens of reasonable plausibility - given the likely impact on deliverability due to time and cost.

- 4.75 Through this assessment, individual strategic parcels were excluded where access was considered unlikely to be reasonably plausible and/or unsuitable in principle for industrial, storage and distribution uses. For example, where access was reliant on narrow local roads, or where parcels were constrained by surrounding development, (e.g. including consideration of noise impacts) or fully surrounded by existing development or greenfield land unsuitable for development (i.e. covered by a primary constraint or exclusion). While further assessments would be required as part of Local Plan preparation, this was considered appropriate for a strategic assessment.
- 4.76 In total this process led to the identification of a total of 11 strategic clusters, or potential BLGs, for this land use. The figure below shows the general extent of the clusters identified as potential candidates for BLGs. The next stage was to better match that with need, spatially and quantitatively to identify those that should be included in the spatial strategy.

Figure: 9 - Distribution of industrial (S&D) GB clusters identified



Prioritisation of clusters and identification of industrial BLGs for the spatial strategy

- 4.77 The first stage in prioritising clusters for designation as broad locations for growth (BLGs) was to consider their distribution across London's Property Market Areas (PMAs). As discussed in Chapter 2, the selective release of well-connected industrial land for housing contributes to the identified shortfall in industrial, storage and distribution land and this is assessed by PMA. While Green Belt sites cannot directly replace sites released, it is strategically important to maintain industrial capacity within the same PMAs where possible (also accounting for limited capacity for growth in the Central Services Area). It is also important to ensure that new supply is accessible to the markets it is intended to serve. Accordingly, ensuring that each outer PMA contained at least one potential cluster was a key consideration.
- 4.78 The remaining clusters were then assessed using a weighted scoring framework to support prioritisation. Nine criteria were applied, grouped and weighted according to their relative significance in relation to sustainability and Plan Good Growth objectives. Scores were then combined to provide an overall ranking for each cluster.
- 4.79 The highest weighted criteria focused on strategic transport and environmental considerations. These were the quality of nearby the TLRN and other strategic road connections in linking the area to central London, the suitability of access routes serving each cluster, the likely effects on congestion, and proximity to Special Areas of Conservation (SACs) given the potential for indirect adverse impacts such as on-air quality. Higher scores were awarded to locations with direct and efficient access to the suitable road network, particularly where routes served key London markets. Congestion impacts were assessed using transport modelling that incorporated both planned residential growth and estimated freight movements associated with large-scale industrial development.
- 4.80 Medium-weighted criteria considered market and operational factors. These included the level of identified demand within the relevant PMA and the relationship of the cluster to existing Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS). These factors helped assess how effectively potential growth locations could support wider industrial land requirements and existing economic clusters.
- 4.81 Lowest weighted criteria comprised the proportion of potential grey belt land, agricultural land quality and the degree of site fragmentation. Higher scores were awarded to clusters

containing larger proportions of potential grey belt and lower-quality agricultural land, reflecting the benefits of avoiding the loss of the best and most versatile agricultural land. More cohesive and contiguous clusters also received higher scores, recognising their greater potential to support strategic-scale development.

- 4.82 Each cluster was assessed against these criteria and assigned a weighted score, producing an overall ranking. Scores ranged from 7.5 to 19, with a maximum score of 23 being possible. To ensure an appropriate geographic spread of supply, the highest-scoring cluster within each PMA was selected initially. The remaining clusters were then considered based on their relative performance, contribution to a balanced spatial strategy and the cumulative quantity of supply.
- 4.83 Following this assessment, two clusters were not selected as broad locations for growth. Both performed relatively poorly against the scoring framework and were located within PMAs that already contained alternative, higher-performing clusters. However, both locations continue to offer potential to accommodate sustainable development for this land use. As such both are identified as potential future candidate BLGs within the London Plan, so that this land can be safeguarded to ensure a steady future supply beyond the plan period if, as present forecasting suggests, additional land is required. The remaining nine clusters are proposed as industrial Broad Locations for Growth and form the basis of the draft London Plan's strategic response to the identified shortfall in industrial land supply.

Table 9 - Identified industrial Green Belt BLGs and potential supply.

Broad location for growth	Approximate maximum theoretical net supply (hectares)
M4 (Heathrow area)	46
M40 (Northolt area)	48
M1 (Borehamwood West area)	64
M25/A10 (Northern Lea Valley area)	59
A12 (Romford area)	75
A127 (Upminster area)	174
A13 (Rainham area)	146

M20 (Swanley area)	113
M25 south (South Chessington area)	50
London-wide total:	774

4.84 As seen in the table above, these nine BLGs together provide potential capacity for up to 774 hectares of additional industrial land. This figure should be considered a maximum potential from these locations and is likely to be further reduced because of local, detailed studies for each location. Unlike for housing, where the London Plan provide specific delivery targets upon which boroughs are measured against, the industrial apportionment proposed in the draft London Plan is by PMA and expressed as benchmarks , with an expectation that Industrial Collaboration Working Groups formed from the Plan-making authorities will help to facilitate and coordinate the meeting of needs on a PMA basis. This provides for a degree of flexibility that should support delivery.

4.85 Notwithstanding the above, it is noted that the maximum potential land supply figures estimated is greater than the total anticipated unmet need for industrial, storage and distribution. As described in chapter 2, the evidence anticipates London’s unmet development needs for these uses to be around 350 ha in the first 10 years, rising to 560 ha by 2050. In the context of the strategic plan, this is considered acceptable on the basis that the total theoretical supply will be refined through local assessments (including in relation the risk of fundamental impacts – see below) and as such these extents should be treated as areas of search. It also provides for flexibility that should enable some degree of market choice. At the 5 year point monitoring can inform review as necessary.

Green Belt impacts from identified supply.

4.86 Throughout this chapter, an objectives-rooted approach to spatially meeting strategic unmet development needs has been set out, defining and identifying sustainable locations for development and collating these into a spatial strategy. However, it is also important to consider the potential cumulative effect from such planned releases on London’s Green Belt, in order to address national policy expectations and as part of the process of considering whether benefits of development outweigh negative impacts. This

must be considered before the capacity and spatial strategy are concluded to be justified and can also help underpin policy requirements.

Overall levels of anticipated release

4.87 The table below summarises the extent of green belt area considered within the cumulative residential and industrial-led BLGs. Note that this relates to the gross potential land supply across all BLGs (i.e. well-connected areas excluding constraints), and so not all of this area would be considered developable land for either use. This is because some is netted off to meet other needs, and in the case of industrial, the extents are being used as areas of search rather than being assumed to be fully developed out. Moreover, not all associated development is likely to happen in the first ten years of the plan.

Table 10 - Total theoretical gross land supply within identified GB BLGs

	Gross land supply total within BLGs (Ha)	As per cent of all London’s Green Belt*
Residential	c. 1,795	5 per cent
Industrial	c. 1,550	4 per cent
Combined	c. 3,345	9.6 per cent

***Total Green Belt area** c.34,750 hectares

4.88 The figures above represent the total potential pool (or supply) of land that the London Plan considered would represent sustainable locations for the two priority land uses. Even considering the total potential gross land supply, together all of the identified BLGs would comprise less than 10 per cent of London’s Green Belt. This is minimised by it being focused (particularly in the case of the residential component) on well-connected land that can sustain higher densities: the equivalent proportion would be much greater

to achieve the same overall capacity target if a dispersed grey-belt first approach were taken or if it were scattered around numerous less well-connected stations. In line with the Good Growth objectives, this overall distribution of growth maintains the ability for the vast majority of London's Green Belt to be enhanced to improve its value as green infrastructure or to offer value to Londoners (for instance through increased accessible greenspace). Initial strategic evidence relating to such opportunities is discussed at the end of this chapter.

- 4.89 The figures above do not include the land which might also be released to provide data centres, as the London Plan does not identify a quantified unmet need or specify associated broad locations where this should be the primary use. As discussed in chapter 3, instead policy criteria are proposed to ensure that future data centres are locations in suitable locations, but this means green belt impacts cannot be assessed at this stage.

Grey belt vs higher performing GB land

- 4.90 The BLGs within the Green Belt identified by the London Plan have been selected on the basis of their suitability for the specific development type, principally based on transport connectivity, rather than their grey belt status. This means that some contain land which has been identified as performing strongly against the national Green Belt purposes. As described in chapter 3, this approach is considered essential if London is to accommodate an overall sustainable pattern of growth. However, as described in chapter 1, future local plan reviews will still be required to implement this strategy and release land from the Green Belt.
- 4.91 Under the current NPPF (2024), local plans remain subject to the expectations within paragraph 146, whereby judgements relating to exceptional circumstances should be informed by considerations of the potential for 'fundamental impacts' - where there is clear evidence that proposed alterations would *"fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan"*). In addition, at present the tests set out in paragraph 148 involving the sequential approach to grey belt must also be considered, even where an adopted SDS has established the strategic distribution of growth. At present the NPPF does not explicitly account for situations the relevant SDS has been prepared in line with the new requirements and has already established the presence of exceptional circumstances or

set out the spatial distribution of growth. Whilst the next London Plan will, regardless, present a major material consideration in any such future decisions, at present consideration of these tests are still required at the local level.

- 4.92 Whilst risks of fundamental impacts would not preclude an area being released through later plan-making based on a wider judgement of all material considerations, it does create risk to deliverability and affect the planning balance. With this in mind, evidence was prepared to understand the extent to which areas being considered for BLGs might present a risk of ‘fundamental impacts’ as part of the development of the London Plan. This was then compared with evidence on potential grey belt extent to determine the overall range of Green Belt performance identified of the land supply within the identified BLGs.
- 4.93 In order to undertake this assessment, the consultants responsible for the London-wide Green Belt Assessment were commissioned to extend their work to consider these issues. The assessment examined the initial ‘areas of search’ identified by the GLA and TfL for both residential and industrial development, comprising all well-connected Green Belt land remaining after the application of primary constraints (i.e. the total gross supply for both land uses, prior to the refinement to only include BLGs). These areas of search have been grouped into regional clusters for the purposes of this study. These clusters of ‘areas of search’ represented the full potential gross land supply considered during the early stages of the assessment, prior to later refinement into BLGs. Not all of the areas of search/clusters tested in this evidence were ultimately put forward as BLGs.
- 4.94 It should be noted that the Green Belt is a strategic planning tool, intended to operate at the metropolitan level and as such extends well beyond the Greater London boundary. Even at scale of the London Plan (i.e. within the London Plan area) it is extensive. Given this, the report states that *“it is reasonable to conclude that no combination of release proposals within a single London borough are capable of fundamentally undermining the purposes (taken together) of the remaining Green Belt across Greater London as a whole. No single London borough includes a significant enough development need or proportion of the whole Greater London’s Green Belt land for this to be a reasonable scenario”* (paragraph 2.8).
- 4.95 As such, the assessment necessarily focused on consideration of this issue at Local Plan area scale. It assessed the potential effects of releasing individual areas, as well as the

cumulative effects of releasing all areas of search within a wider region on the Green Belt function within each affected borough. Areas were categorised according to whether release was considered to pose no risk, some potential risk, or a likely risk of fundamentally undermining the purposes of the remaining Green Belt. The assessment did not seek to make definitive judgements on whether future allocations or releases would result in fundamental impacts. Such conclusions depend on detailed proposals and site boundaries that will only emerge through Local Plan preparation. Instead, the study provides an indication of potential risks and sensitivities that should inform future Green Belt reviews and development proposals.

- 4.96 The full assessment forms part of the London Plan evidence base and is published alongside this report²⁷. Overall, it found considerable variation in potential risks and Green Belt performance across London. No clusters within the areas of search were found to be wholly affected by likely fundamental impacts and several clusters contained no identified risks. While most clusters included some areas where potential risks were identified, these were often limited in extent and capable of being addressed through refinements to future release proposals.
- 4.97 To support the development of the London Plan, the GLA undertook further geospatial analysis comparing the identified BLGs against outputs from both the fundamental impacts assessment and the London-wide Green Belt Assessment. This enabled a high-level understanding of the extent of potential grey belt land and risk of fundamental impacts within each BLG area. The table below brings together findings from both studies in terms of the land within the identified BLGs – note that this considered the total potential gross land supply as with the table 10 above.

²⁷ Potential Fundamental Impacts on Green Belt Land Report, LUC June 2026, [available online](#).

Table 11 - Proportion of gross BLG land supply identified as potential grey belt vs areas at risk of fundamental impacts in strategic evidence.

BLG type	Area of grey belt within BLG supply (Ha)	Per cent grey belt within BLG supply	Area where fundamental impacts are likely (ha)	Per cent of BLG supply were FI likely	Area with some potential for fundamental impacts (ha)	Per cent of BLG supply with some potential for FIs
Residential	604	34%	64	4%	281	16%
Industrial	194	13%	94	6%	641	41%
Combined	797	24%	158	5%	922	28%

4.98 The results indicate that the proposed BLGs contain a mix of lower- and higher-performing Green Belt land. On average, around 24 per cent of the gross land supply within BLGs was identified as potential grey belt, compared with the approximately 20 per cent average across London as a whole. Around 5 per cent of the combined BLG supply was identified as being at likely risk of fundamental impacts, with a further 28 per cent identified as having some potential risk. Given that the search process prioritised sustainable locations rather than Green Belt performance, this represents a relatively balanced outcome.

4.99 However, residential BLGs are less likely overall to present a risk of fundamental impacts than industrial. While the performance of each individual BLG varies, this overall trend is reflective of the differences in the characteristics of the land representing sustainable locations for each. For residential the BLGs generally relate to land adjacent to existing rail-lines within or at the edge of London's urban extent. Here there is a higher propensity for a combination of factors which limit Green Belt performance, such as increased urbanising influences, physical barriers and a disconnection with the wider countryside. Conversely, many of the industrial sites, selected on the basis of their high-quality freight access, utilise more peripheral sites within the Green Belt further from the wider urban conurbation. For these sites there tends to be a higher propensity for a stronger connection with the wider countryside and role in preventing sprawl. Moreover, it should also be noted that given the industrial BLGs remain of the 'areas of search' type,

this gives plenty of scope for a fundamental impacts assessment to inform their refinement.

4.100 Indeed, the evidence also highlights opportunities to mitigate potential impacts through design-led approaches and careful boundary refinement. Measures such as retaining strategic green wedges, protecting key gaps between settlements and responding to local landscape character can help maintain Green Belt functions while accommodating development. These considerations will be central to future master planning and Green Belt reviews at the local level. The gross-to-net assumptions applied within the capacity modelling, which excludes between 30 per cent and 50 per cent of the identified land supply to accommodate supporting uses, infrastructure and natural features, provides additional flexibility to accommodate such mitigation measures.

4.101 In the case of industrial development, the overall land supply identified exceeds the minimum quantitative shortfall identified through the evidence base. Part of the rationale reflects a recognition that portions of the potential supply may ultimately need to remain undeveloped in order to protect Green Belt function and respond to local constraints.

4.102 Overall, the evidence indicates that release within the identified BLGs may give rise to Green Belt impacts in some locations. However, these impacts are not considered insurmountable and can be addressed through the detailed, design-led assessments required at the Local Plan stage. Where they remain, they are likely to be of limited significance relative to the overall benefits of development in respect of plan objectives. The findings therefore support the conclusion that the proposed BLGs ensure an appropriate balance between accommodating development needs and maintaining the strategic integrity of London's Green Belt.

Land supply summary and conclusions.

4.103 This chapter set out the methodology used to identify broad locations for growth (BLGs) within London's Green Belt and to estimate the development capacity that these locations could provide. The approach is founded on the principle that any Green Belt release should be focused on sustainable locations compatible with the plan's objectives. Separate assessments were undertaken for residential development and industrial storage and distribution uses, reflecting their differing locational requirements. In both cases, the

process began by identifying well-connected Green Belt land, applying a series of exclusions based on land-use designation and physical constraints, and then refining the resulting land supply through further consideration spatial distribution. The exercise is strategic in nature and is only intended to identify broad locations and to set priorities for future local review rather than allocate sites or determine the suitability of specific development proposals.

4.104 For residential development, the assessment focused on locations with strong public transport accessibility, particularly around existing and potential rail stations capable of supporting car-light patterns of growth. Following the application of constraints and gross-to-net discounts, density assumptions based on varying connectivity scores were applied to estimate potential development capacity. These assumptions were informed by evidence from comparable developments in London and elsewhere, including sustainable urban extensions delivered through Green Belt release. The analysis concluded that compact, mid-rise development offers the most appropriate balance between housing delivery, environmental performance, viability and placemaking. Lower-density suburban models would make inefficient use of scarce, well-connected land, while significantly higher-density approaches would place greater pressure on infrastructure and reduce opportunities to provide family housing. The resulting approach supports a form of compact peri-urban development, integrating homes, services, public transport and green infrastructure within well-connected locations.

4.105 This process resulted in the identification of 10 residential-led BLGs, providing a strategic response to the significant shortfall in residential needs in the evidence base. For residential, the additional capacity (just over 56 000 units) provided by these BLGs would not be sufficient to fully balance London's anticipated unmet needs. However, the capacity identified was considered to represent the maximum reasonably plausible extent to which unmet needs can be accommodated and delivered with the 10 year period, in light of the plan's Good Growth objectives, strategic impacts and infrastructure capacity. A further 8-9 potential future candidate BLGs were also identified where land may be safeguarded for future potential capacity, contingent on the unlocking of this land through longer term transport investment.

4.106 The assessment also considered the role of future transport investment in expanding the supply of well-connected Green Belt land. Analysis identified a range of potential future rail enhancements and quality bus corridors that could increase the extent of well-

connected land beyond the first ten years of the Plan period. While these schemes are not relied upon to support delivery within the target setting period, they are relevant when considering longer-term growth and the potential safeguarding of land to meet needs beyond the current plan period. A further 8-9 potential future candidate BLGs were also identified as well as additional land surrounding the initial (10 year) BLGs where land may be safeguarded for future potential capacity, contingent on the unlocking of this land through longer term transport investment.

4.107 A separate assessment was undertaken for industrial storage and distribution uses, with sustainable locations defined primarily by proximity to freight-suitable sections of the road network. Additional exclusions were applied to reflect the operational requirements of these uses, including topography, established canopy cover, minimum parcel size and the need to safeguard well-connected land for residential development. The resulting land supply was refined through access- testing and grouped into strategic-scale clusters. These clusters were then assessed against a range of weighted transport, environmental, operational and land-use criteria to determine their suitability for designation as BLGs. This process resulted in the identification of nine industrial BLGs distributed across London's outer Property Market Areas, providing a strategic response to the significant shortfall in industrial storage and distribution land identified in the evidence base.

4.108 Recognising that sustainable transport connectivity was the most robust primary consideration in identifying BLGs, further work was undertaken to understand the implications for Green Belt performance. Additional analysis considered the extent to which potential releases could result in fundamental impacts on the remaining Green Belt within individual boroughs, as required by national policy. The findings indicate that the identified BLGs contain a mix of lower- and higher-performing Green Belt land, including areas of potential grey belt. While some locations present potential risks to Green Belt purposes, no cluster was found to be wholly unsuitable and many risks could be reduced through boundary refinement, landscape-led master planning, retention of strategic green wedges and other mitigation measures. The capacity assumptions applied throughout the chapter already provide substantial flexibility to accommodate such local responses.

4.109 Overall, the chapter concludes that a proactive, sustainability-led approach to Green Belt release can identify a meaningful supply of land capable of addressing part of London's unmet housing and industrial needs. The proposed BLGs represent locations that are best

placed to support sustainable development and maximise the use of existing and planned infrastructure, as well as providing for scope to address other needs, including environmental enhancement. As such, they provide good opportunities to deliver the plan's Good Growth objectives, particularly in respect of Making Best Use of Land, but also in the thematic objectives relating to housing, economic and environmental needs. While detailed assessment and Green Belt review will remain necessary through future Local Plans, the evidence demonstrates that the broad locations identified provide a reasonable, developable and strategically coherent basis for the London Plan's approach to selective Green Belt release.

5 Green Belt policy: A new strategic approach

- 5.1 Throughout this report, it has been established that Green Belt release in London is justifiable but should be highly targeted towards the most sustainable locations and carefully shaped into sustainable forms of development that help achieve Good Growth objectives. The Plan expects boroughs to take this strategy forward through Local Plans, including the preparation of site allocations, infrastructure strategies and proposals for Green Belt enhancement. The anticipated development capacity arising from these releases has also been incorporated into borough housing targets and the industrial land benchmarks.
- 5.2 However, these measures alone do not provide a sufficient framework for implementation. For example, they do not identify which parts of each BLG represent the most sustainable locations, nor do they establish expectations for the form, density or quality of development. Without additional policy direction, there is a risk that scarce, well-connected land could be developed inefficiently, limiting housing delivery, undermining infrastructure investment and reducing overall sustainability benefits. Equally, development could be directed towards less well-connected areas that do not align with the spatial strategy set out in this report.
- 5.3 Moreover, it will also be important – as the Fundamental Impacts evidence indicates, that Green Belt enhancement measures are incorporated as part of more detailed plans and proposals, to help manage overall impacts on Green Belt integrity. And overall, it is also acknowledged that in some places a shift in the approach to balancing development with

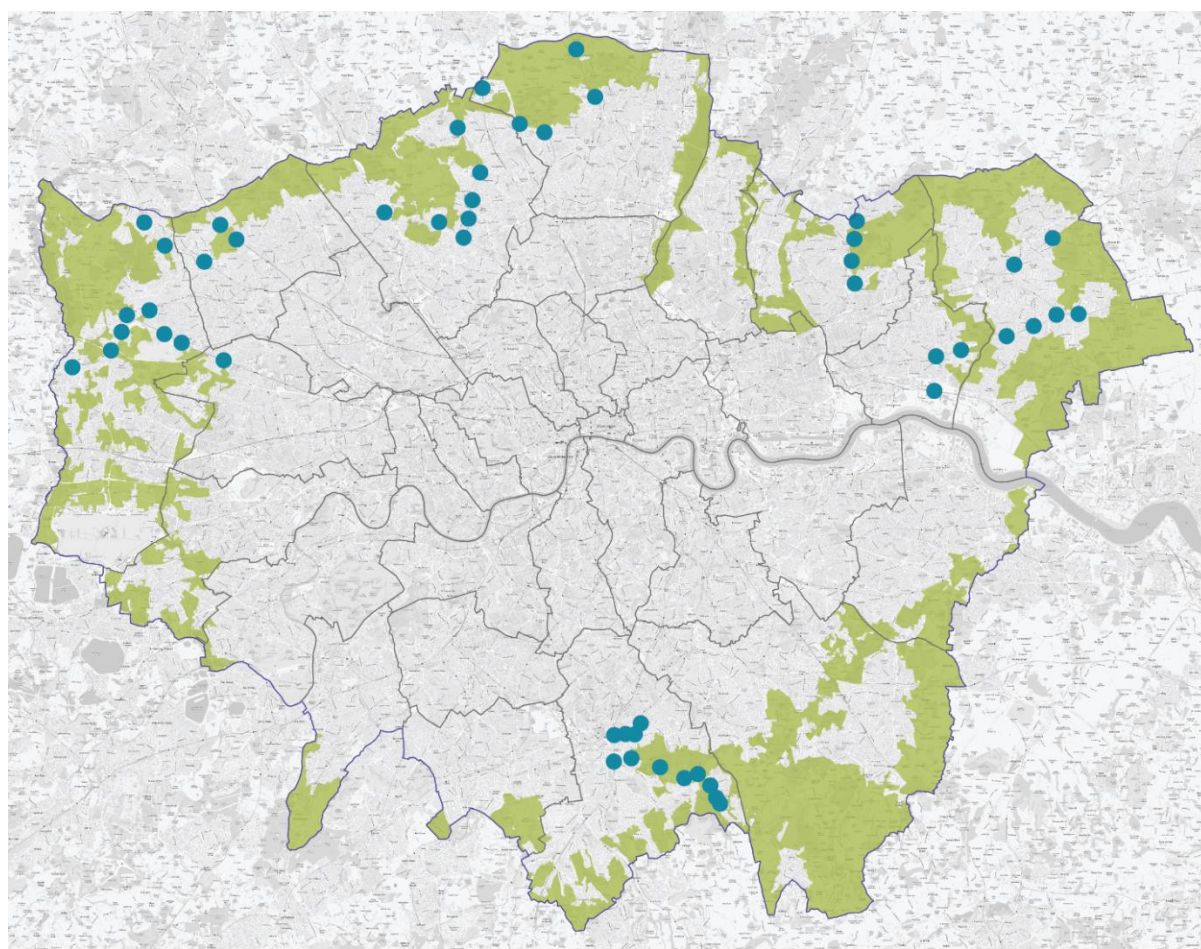
openness will be needed, deploying the complementary policy tool of Metropolitan Open Land designation.

- 5.4 The draft London Plan therefore incorporates additional policy measures to support implementation of the strategy. This chapter summarises these measures and explains their purpose.

Sustainable locations criteria

- 5.5 The Key Diagrams within the London Plan show – broadly – the most sustainable locations identified through this work; however, the London Plan cannot allocate sites or identify specific development parcels. Additional policy direction is therefore required to ensure that the highly targeted approach can be – and is – implemented effectively at the local level, both through Local Plans, and as necessary, development management.
- 5.6 As such, additional directive criteria on how the sustainable locations test should be applied have been incorporated in the draft London Plan. The policy, (PV7 – sustainable development and enhancement of the Green Belt) includes figures spatially illustrating the locations of the specific rail stations or highway junctions found to be the most well-connected and used to formulate the broad locations identified. These specific transport nodes and catchments (1.2km for residential, 2.5km for industrial) are then explicitly referred to in the policy as forming the basis for sustainable locations for residential or industrial led major growth.
- 5.7 The relevant figures from the draft policy are reproduced below.

Figure: 10 - Rail stations identified as suitable to accommodate major residential growth



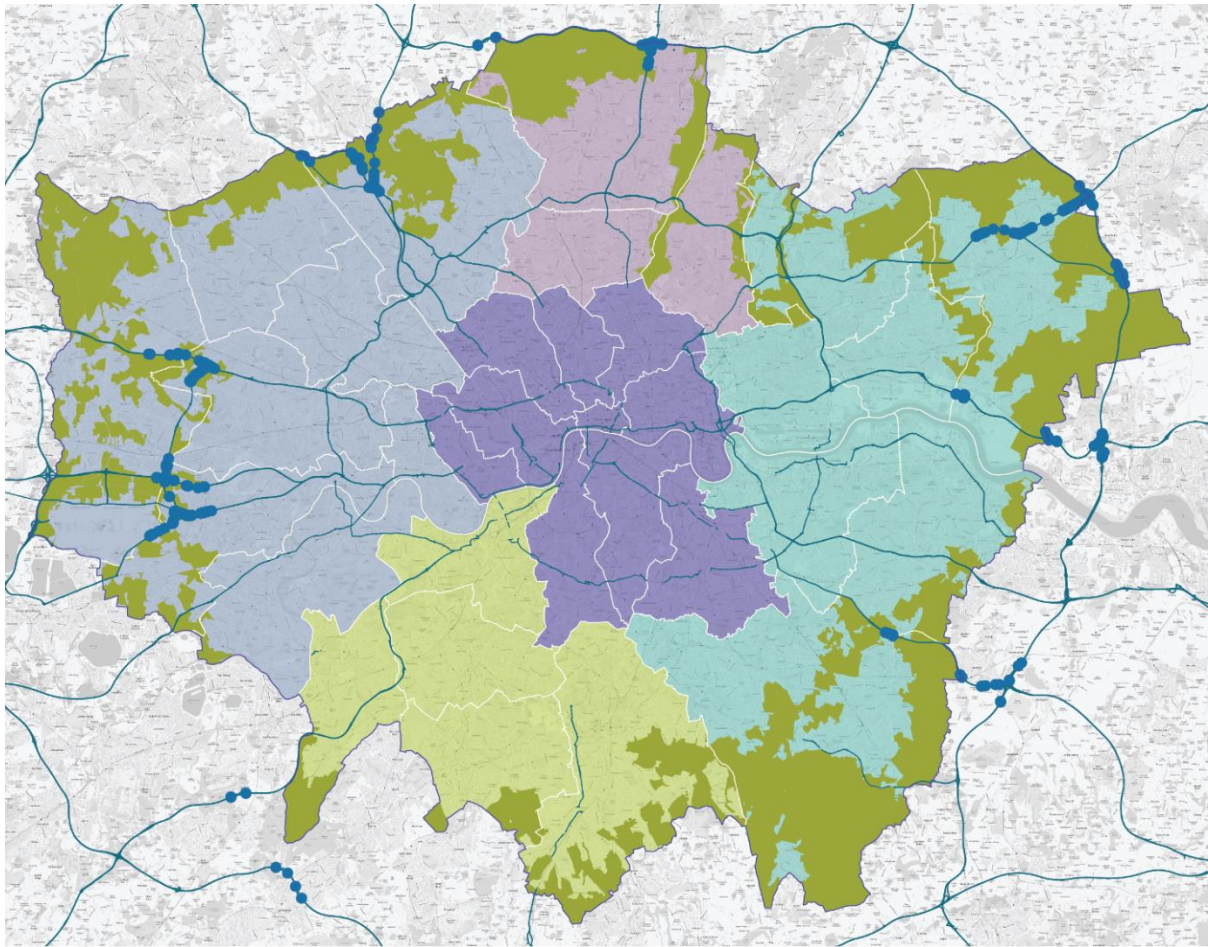
KEY

 Green Belt

 Well connected railway stations

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Figure: 11 - Junctions with a suitable section of the strategic road network shown to have adequate capacity and flow rates to accommodate major growth for industrial



KEY

- Green Belt
- Suitable Road Network junctions
- Suitable Strategic Road Network

London Property Market Areas

- Central Services
- Lea Valley
- Park Royal
- Thames Gateway
- Wandle Valley

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Residential design criteria

- 5.8 The policy also includes development management criteria which act as development parameters and are important particularly prior to Local Plans being updated with more spatially detailed policies. These provisions are intended to ensure that any early development proposals support the strategic objectives of the London Plan, deliver key benefits locally and do not compromise the long-term potential of identified BLGs.

Density

- 5.9 The draft policy incorporates net density expectations aligned with those in the capacity methodology. Table 6.2 of the policy establishes indicative density ranges linked to three connectivity bands based on proximity to identified stations. While this approach is simpler than the detailed accessibility methodology used within the evidence base, it provides a practical and consistent framework for implementation. Through plan-making, the policy implementation text is clear that boroughs can work alongside TfL to take a more granular and sophisticated approach.

Parking

- 5.10 Parking provision is closely linked to development density and the ability to support car-light patterns of growth. Policy PV7 therefore establishes maximum parking standards linked to the three connectivity bands, reflecting that higher levels of parking may be appropriate in the relatively less accessible locations within the identified catchments, with lower densities and a greater proportion of houses and maisonettes. These standards are aligned with Policy GHR11 (Cycle and Car Parking).

Accessible Green Space

- 5.11 Table 6.2 also includes accessible green space standards to be used in the absence of (more ambitious) locally established ones. A benchmark of three hectares per 1,000 residents is applied across all connectivity bands. This is derived from Natural England's Green Infrastructure Framework²⁸ and reflects the approach referenced within the NPPF's Golden Rules. Its inclusion in the London Plan is intended to establish a clear expectation for the level of green infrastructure that should accompany Green Belt release. Consistent with draft Policy GHR8 (Accessible Green Space), delivery may be achieved through a

²⁸ Natural England, 2026, [available online](#).

combination of on-site provision and contributions towards larger strategic green infrastructure projects.

Quality bus connections

- 5.12 The quality of bus services required to support Green Belt release also warrants specific policy attention. As described in Chapter 4, the GLA and TfL identified a limited number of locations where high-quality bus corridors could extend the catchment of highly accessible station areas within identified BLGs. However, this approach is only appropriate where very high standards and reliability of service can be achieved to ensure the service is effective in supporting car-light living.
- 5.13 Historically, the presence of a local bus service has often been used as evidence of a site's sustainability. Given the scale of growth now anticipated both within London and in parts of the Green Belt, a more rigorous approach is required. Policy PV7 therefore includes specific and measurable standards against which proposals can be assessed. These criteria are intended to ensure that only genuinely high-quality public transport connections are relied upon when supporting Green Belt release and associated development capacity.

Green Belt Enhancement

- 5.14 Consistent with the NPPF, the policy also sets out the expectation that strategic green belt / green space enhancements should be identified, prioritised and incorporated into Local Plan policy. This is a crucial element of the vision of Green Belt release in terms of being landscape-led and contributing to other environmental ambitions, as well as managing the risk of Fundamental Impacts. In doing so, the supporting text references the strategic evidence base which has been prepared alongside the plan to approach this issue strategically, highlighting appropriate cross-borough boundary opportunities. More detail about this work is set out in Annex C.

The role of Metropolitan Open Land designation

- 5.15 In London, there has long been a complementary policy tool for ensuring a balance between urbanisation and openness within the urban area itself, with pockets of relief being maintained through Metropolitan Open Land (MOL) designation. This recognises

that much of London is a long way from the open countryside of the Green Belt and as such, extensive or otherwise qualitatively distinct green spaces have an important role in the built-up area.

- 5.16 The new approach to development in the Green Belt will result in locally experienced changes to its extent and potentially performance. In parallel, the new national policy concept of grey belt has brought some lack of clarity in respect of the status of valued green spaces that have no other policy designation. With this in mind, some supplementary analysis was commissioned to provide a high-level picture of isolated or potentially isolated (due to release) Green Belt fragments that might be better suited to a MOL designation.
- 5.17 If undertaken in parallel with Green Belt reviews and enhancement strategies and the development of master planning parameters for Green Belt BLGs, new MOL designations may enable Green Belt release to be accompanied by a new spatial approach to maintaining openness and green space access in some edge-of-London locations. In short it would involve (in some places), moving from a restrictive outer 'belt' without inherent recreational or green infrastructure value to a more mosaic- or corridor-based approach that may benefit more people. The Green Belt policy should therefore be read alongside the MOL policy (PV6).
- 5.18 More detail about this work and how it can be used as a starting point for Local Plan analysis in line with the revised MOL policy is set out in Annex C.

Policy response summary

- 5.19 The draft London Plan not only identifies BLGs and apports development need but also introduces a supporting policy framework to ensure that any future Green Belt release is implemented in a consistent and sustainable manner. The chapter concludes that additional policy direction is required to prevent poorly located or under-optimised development, and to ensure that the limited supply of well-connected Green Belt land is used efficiently.
- 5.20 To achieve this, Policy PV7 (Sustainable Development and Enhancement of the Green Belt) establishes clear criteria for identifying sustainable locations for release, linked to

specific rail stations and Strategic Road Network junctions identified through the evidence base. It also defines indicative catchments around these transport nodes to provide certainty for Local Plan reviews and focus detailed assessment on the areas most capable of supporting sustainable growth. The policy is supported by interim development management requirements covering density, parking and green infrastructure. These measures are intended to ensure that both proposals that come forward prior to / in the absence of local policy detail, and ultimately Local Plans themselves support the London Plan's vision for compact, car-light and landscape-led development. The policy also establishes expectations for the delivery of accessible green space and wider Green Belt enhancement, including contributions towards strategic green infrastructure. Finally, it introduces specific quality criteria for express bus services in locations where enhanced public transport connectivity may justify additional development capacity. Together, these measures provide the policy framework necessary to deliver the targeted, sustainable and infrastructure-led approach to Green Belt release set out in this report, together with provision for safeguarding future land and capacity.

6 Summary and Conclusion

Report summary

- 6.1 This report has set out the case for, and proposed approach to, the selective release of Green Belt land through the new London Plan. It has considered the implications of recent changes to national planning policy, the evidence on London's future development needs, and the Plan's Good Growth objectives, and set out key principles and methodological response. This identifies broad locations, key parameters and a quantum of growth for the first 10 years of the plan that is compatible with definitions of sustainable development.
- 6.2 This report has set out the case for, and proposed approach to, the selective release of Green Belt land through the new London Plan. It has considered the implications of recent changes to national planning policy, the evidence on London's future development needs, and the Plan's Good Growth objectives, and set out key principles and methodological response. This identifies broad locations, key parameters and a quantum of growth for the first 10 years of the plan that is compatible with definitions of sustainable development.
- 6.3 The evidence consistently demonstrates that London faces significant unmet development needs that cannot be accommodated within its existing urban area through brownfield land alone. Extensive work has been undertaken across the plan-making process to increase development densities and make best use of land, including testing new and alternative sources of supply. Despite these efforts, substantial shortfalls remain in relation to housing and industrial, storage and distribution land, while continued growth in the data centre sector is expected to generate additional pressures on London's constrained land supply. The evidence also demonstrates that alternative approaches, including reliance on Metropolitan Open Land or redistribution of need to neighbouring authorities, would not provide a realistic, sustainable or strategically effective solution.
- 6.4 The report has also considered the implications of national policy relating to Green Belt release and grey belt. While the NPPF introduces an expectation that lower-performing Green Belt land should be prioritised where release is required, it is equally clear that sustainable patterns of development remain the overriding consideration. The London-wide Green Belt Assessment demonstrates that potential grey belt land is unevenly

distributed and often poorly aligned with the locations best suited to accommodate strategic growth. The evidence therefore supports an approach that prioritises wider factors, including transport connectivity, infrastructure capacity, environmental impacts and the ability to support comprehensive, plan-led development over Green Belt performance alone.

- 6.5 In response, the draft London Plan adopts a sustainability-led approach to identifying locations for growth. For residential development, this has focused on areas with strong public transport connectivity capable of supporting compact, medium-density, car-light neighbourhoods. For industrial development, it has focused on locations with appropriate access to the freight-suitable roads and junctions with suitable capacity to support the transport needs of modern storage and distribution uses. The resulting BLGs have been identified through a robust and clear process involving transport analysis, environmental constraints mapping, capacity testing and consideration of Green Belt performance. Together, they provide a spatial framework capable of addressing a meaningful proportion of London's unmet development needs while supporting wider Good Growth objectives.
- 6.6 The report also recognises that the identification of BLGs does not, in itself, determine how Green Belt boundaries should be adjusted. Detailed Green Belt reviews, site allocations, master planning exercises and planning assessments will continue to be required through Local Plans and subsequent decision-making processes. The evidence presented is strategic in nature and is intended to guide the overall distribution of growth rather than predetermine local processes, albeit it will be a consideration as part of those.

Report conclusions

- 6.7 Taken together, the strategic evidence base demonstrates that exceptional circumstances exist to justify a strategic response to Green Belt release through the new London Plan. Significant unmet needs for housing and industrial land remain after exhausting all reasonable opportunities to optimise brownfield capacity, and there is no realistic alternative source of land capable of meeting these needs within a sustainable spatial framework.

- 6.8 The evidence further demonstrates that a strategy focused solely on the release of potential grey belt land would not provide an effective or sustainable solution. Instead, the most appropriate approach is one that prioritises locations capable of supporting sustainable patterns of development, making best use of existing and planned infrastructure, and delivering development at a scale sufficient to support infrastructure investment, affordable housing and environmental enhancement.
- 6.9 The BLGs identified through this report provide a reasonable and developable basis for this strategy. They are capable of accommodating significant additional housing and industrial capacity, support the objectives of compact and transit-oriented growth, and offer opportunities for landscape-led master planning, environmental stewardship and Green Belt enhancement. While some locations include land that performs strongly against Green Belt purposes, the evidence indicates that impacts on Green Belt function can be managed and mitigated through detailed local planning, site design and boundary refinement.
- 6.10 Taken as a whole, the report concludes that selective Green Belt release forms a necessary and proportionate component of a sound long-term spatial strategy for London. It provides the opportunity to address pressing development needs and secure environmental enhancements while maintaining the overall strategic function and integrity of the Green Belt. Subject to detailed assessment and implementation through future Local Plans, the approach set out in the draft London Plan is considered justified, evidence-based, and consistent with both national policy and the Mayor's Good Growth objectives.
- 6.11 The analysis also makes clear that there is a limit to the quantum of growth in the Green Belt, particularly housing, that can be reasonably plausibly depended on to be delivered in the first 10 years of the plan. This means planned Green Belt growth cannot fully address the 'gap to need' (quantum of unmet need) in this timescale. However, the approach established as part of the spatial strategy enables appropriate safeguarding of land with potentially suitable future capacity. This is to ensure it can be optimised as transport investment propositions crystallise, meaning such land can conceivably form part of a strategy to meeting needs over the longer term. This long-term perspective and careful management of potential is arguably as important as the identification of more immediate growth capacity.

Appendix A – Abbreviations

The table below summarises the various abbreviations used throughout this report.

BLGs	Broad Locations for Growth
GB	Green Belt
GIS	Geographic Information Systems
HA	Hectares
LPAs	Local Planning Authorities (within Greater London usually the boroughs)
NPPG	National Planning Practice Guidance
NPPF	National Planning Policy Framework
SDS	Spatial Development Strategy

Appendix B – Residential case study extracts

The table below summarises the various abbreviations used throughout this report.

Name	Location	Net avg density	Building heights	% of 3b+ units	Residential typologies	Parking ratio	PTAL	Distance to nearest transport hub
Aura	Great Kneighton, Cambridge	44 dph	2 - 5	55%	Apartments, terraced houses, semi-detached houses, detached houses	1.5	N/A	Local buses: ~480m Bus rapid transit: ~800m Proposed National Rail: ~1.3km
Dujardin Mews	LB Enfield, London	48 dph	2-3	63%	Apartments, terraced houses, maisonettes	0.7	1b - 2	National Rail: ~270m
Abode	Great Kneighton, Cambridge	48 dph	2 - 5	50%	Apartments, terraced houses, detached houses	1.5	N/A	Local buses: ~320m Bus rapid transit: ~640m Proposed National Rail: ~1.3km
Ashmere (Phase 1)	Ebbsfleet Garden City	50 dph	2 - 5	34%	Apartments, flats-over-garages,	1.5	N/A	Bus rapid transit: ~800m

					detached houses			
Erith Quarry (Parcels 3B, 6, 9 and 15)	LB Bexley, London	60 dph	2 - 5	22%	Apartments, maisonettes, terraced houses, semi-detached homes, detached homes	1.24	1a - 1b	National Rail: ~1.4km
Rochester Riverside (Phases 2 and 3)	Rochester	61 dph	3 - 6	24%	Apartments, terraced houses, semi-detached houses, detached houses, mews	1.2	N/A	National Rail: ~480m
Evolution South	LB Barnet, London	62 dph	2 - 5	33%	Apartments, terraced houses, detached houses	1.1	1b - 2	Local buses: ~320m London Underground: ~1.4km
Brabazon (Phase 1)	Bristol	68 dph	2 - 6	41%	Apartments, terraced houses, mews	1.0	N/A	Proposed National Rail (August 2026 completion) : ~600m Euclidean distance
Marleigh Park (Phase 2)	Cambridge East, Cambridge	76 dph	3 - 4	15%	Apartments, terraced houses, semi-detached houses, detached homes	1.1	N/A	Park & Ride: ~640m
Knights Park	Eddington, Cambridge	92 dph	3 - 5	37%	Apartments, terraced houses, semi-	1.3	N/A	Local buses: ~800m

					detached houses, villas			Park & Ride: ~1.2km
Hook Park	LB Kingston upon Thames, London	95 dph	4 - 8	31%	Mansion blocks, terraced houses	0.4	0 - 1b	Proposed new shuttle bus to Chessington North (National Rail, approx. 2km)
Chobham Manor	LB Newham, London	105 dph	3 - 8	75%	Apartments, mansion blocks, terraced houses, maisonettes, mews	0.6	1a - 4	Local buses: ~640m London Underground/London Overground /National Rail: ~1.4km
Climate Innovation District	Leeds	132 dph	3	38%	Apartments, terraced houses	0.6	N/A	Local buses: ~320m
St Ann's	LB Haringey, London	135 dph	3 - 10	17%	Apartments, terraced houses, villas	0.2	N/A	Local buses: ~290m London Overground : ~970m
The Malings	Newcastle	138 dph	3 - 6	38%	Apartments, maisonettes, terraced houses	1.0	N/A	Local buses: ~800m
Barking Riverside (Plots 206B and 207A)	LB Barking and Dagenham, London	150 dph	3 - 7	28%	Apartments, mansion blocks, terraced	0.5	1a - 2	London Overground : ~970m

					houses, maisonettes			
Kidbrook e Park North	LB Greenwich, London	153 dph	4 - 10	26%	Apartments, maisonettes	Car-free	2 - 3	National Rail: ~550m
Harrow View East (Plot D7)	LB Harrow, London	158 dph	3 - 10	15%	Apartments, mansion blocks, terraced houses	0.4	2 - 3 (at time of submis sion)	London Undergroun d, London Overground , National Rail: ~800m
Plashet Road	LB Newham, London	160 dph	5	40%	Apartments	0.1	3	London Undergroun d: ~970m

The table below shows how precedents have been used to inform density banding assumptions

Case study name	Location	Net average density (dwellings per hectare)	Net density band (dwellings per hectare)
Aura	Great Kneighton, Cambridge	44 dph	50 – 70 dph
Dujardin Mews	LB Enfield, London	48 dph	50 – 70 dph
Abode	Great Kneighton, Cambridge	48 dph	50 – 70 dph
Ashmere (Phase 1)	Ebbsfleet Garden City	50 dph	50 – 70 dph
Erith Quarry (Parcels 3B, 6, 9 and 15)	LB Bexley, London	60 dph	50 – 70 dph

Rochester Riverside (Phases 2 and 3)	Rochester	61 dph	50 – 70 dph
Brabazon (Phase 1)	Bristol	68 dph	50 – 70 dph
Marleigh Park (Phase 2)	Cambridge East, Cambridge	76 dph	50 – 70 dph
Knights Park	Eddington, Cambridge	92 dph	80 – 90 dph
Hook Park	LB Kingston upon Thames, London	95 dph	80 – 90 dph
Chobham Manor	LB Newham, London	105 dph	80 – 90 dph
Brentford Lock West (Block G)	LB Brentford	127 dph	120 – 130 dph
Climate Innovation District	Leeds	132 dph	120 – 130 dph
St Ann's	LB Haringey, London	135 dph	120 – 130 dph
The Malings	Newcastle	138 dph	120 – 130 dph

Barking Riverside (Plots 206B and 207A)	LB Barking and Dagenham, London	150 dph	150 – 160 dph
Kidbrooke Park North	LB Greenwich, London	153 dph	150 – 160 dph
Harrow View East (Plot D7)	LB Harrow, London	158 dph	150 – 160 dph
Plashet Road	LB Newham, London	160 dph	150 – 160 dph

Appendix C – Green Belt enhancement and opportunities to designation Metropolitan Open Land

Green Belt enhancement

The main focus of this report has been related to meeting strategic development needs and the more direct impacts of this. However, it is also important to understand the opportunities for green belt enhancement that development can bring. Opportunities to improve the quality of and access to Green Belt land both within the BLGs as well as the remaining c.90 per cent of London's Green Belt may also be unlocked through such investment.

The NPPF requires authorities featuring Green Belt land to *“plan positively to enhance [the GB's] beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land”* (p.151). In the past the Mayor has not attempted to identify strategically significant enhancement opportunities within the London Plan given there were previously no BLGs planned in the Green Belt as part of the Plan's spatial strategy. Given that the new London Plan takes a new position and expects boroughs to review Green Belt boundaries to accommodate additional growth it was more appropriate to do so. As such, strategic analysis to identify the most significant opportunities for enhancement was undertaken with the intention that it would provide a helpful starting point for master planning the new BLGs and a tool to help co-ordinate delivery of strategic green infrastructure.

The evidence - produced as a supplementary workstream to the Green Belt Assessment - therefore identifies green infrastructure (GI) enhancement opportunities within Green Belt well related to the areas of search (equivalent to the total gross land supply) that were being considered to form Broad Locations for Growth (BLGs) at the point of commissioning. Although the report looks across London's Green Belt, opportunities which fall in close proximity to these areas of search were judged to be more likely to be able to benefit from enhancement relating to nearby release.

A green infrastructure focus acknowledges the multi-functional benefits of such enhancement which will contribute to several of the plan's Good Growth objectives. The approach collates

information from a wide range of existing sources into a single report, undertaking a high-level review of opportunities within sub-regional clusters. As this was only a desktop review, it does not attempt to be exhaustive nor directive, as further work will be needed to refine the ideas into deliverable propositions.

For every cluster area identified across London (15 in total), the report presents a concise summary of priority, strategic objectives and opportunities identified from within the wide body of evidence reviewed. These are presented in a consistent manner, allowing for opportunities to be identified across boundaries and across wider regions of the city. Mapping at both the regional scale as well as cluster scale is provided, which illustrates spatial opportunities such as opportunities to link up existing green spaces to form a wider network of connected green infrastructure.

The full report is available online and is published alongside this report²⁹.

Opportunities to designate Metropolitan Open Land (MOL)

With similar aims, an additional study was also undertaken specifically to review land within London's Green Belt to identify areas with potential to be designated as Metropolitan Open Land (MOL), based on the four criteria set out in Policy G3 of the London Plan (2021).

The London-wide Green Belt assessment found that around 20 per cent of Green Belt land could meet grey belt criteria. However, as noted earlier in this report, the narrow grey belt definition does not account for wider considerations, such as the open space/recreational function of some such land, even when it is only designated as Green Belt. Given the objective to limit Green Belt release to only the most suitable areas while protecting accessible green space, it was important to assess whether some Green Belt land could instead qualify as Metropolitan Open Land (MOL). This could then also help inform work to refine areas of Green Belt release and inform master planning work at the local level.

Only Green Belt land that is wholly or largely contained within the urban area can meet MOL criteria. The study therefore started by identifying areas partially or fully isolated from the wider

²⁹ London Green Belt Enhancement Opportunities report, LUC June 2026, [available online](#).

countryside, again using GLA 'areas of search' (broader than the final BLGs) and considering additional areas that could potentially become isolated through future releases.

Each current or potential isolated 'island' was then assessed against current MOL criteria, with results mapped and summarised by borough. While all boroughs contained some land with MOL potential—often overlapping with potential grey belt—the extent varied significantly. In boroughs with highly isolated Green Belt parcels almost the entirety of their Green Belt land has potential to meet the MOL criteria. Conversely in boroughs with Green Belt that is currently well connected to the wider countryside, opportunities for MOL designation are more likely to be limited to within the current or future urban edge. The evidence also shows that across many of the Green Belt BLGs identified by the London Plan, some areas may potentially meet the MOL criteria. This may present master planning opportunities for integrated accessible green space in some locations.

It should be noted that as this study applied the policy criteria of the current (2021) London Plan; future assessments may need to review these findings against the new policies within the new London Plan. The full report is available online and is published alongside this report³⁰.

³⁰ London Green Belt MOL Opportunities report, LUC June 2026, [available online](#).

London Plan Green Belt strategic approach report

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Greater London Authority

July 2026

Published by:
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London E16 1ZE

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