

# Draft Buckinghamshire Green Belt Assessment

## Executive summary

February 2026

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This is a Green Belt Assessment (GBA) undertaken in line with the Green Belt Planning Practice Guidance ([PPG](#)) and is focused on identifying grey belt.

The background is explained in **Section 1**, but a key point to note is NPPF paragraph 148, which states: *“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.”*

The first task was to divide the Buckinghamshire Green Belt into Assessment Areas (AAs), and this is discussed in **Section 2**. The PPG encourages *small* AAs with a view to robust assessment, i.e. avoiding large AAs being assessed as ‘not grey belt’ despite containing some grey belt, and vice versa. In particular, the PPG explains a need to assess small AAs around settlements and close to transport hubs.

The starting point was the 171 AAs defined for the purposes of the previous Buckinghamshire GBA in 2016. These AAs remain robust, such that the task was to subdivide them, and the outcome is 808 AAs for assessment through this GBA.

Having defined AAs, attention turns to the assessment, and the first consideration is assessment against the Green Belt purposes defined at NPPF para 143. However, the PPG is clear that only three of the five purposes apply as part of work to identify grey belt, namely Purposes A, B and D. Specifically:

- Purpose A – Check the unrestricted sprawl of large built-up areas
- Purpose B – Prevent neighbouring towns merging into one another
- Purpose D – Preserve the setting and special character of historic towns

Also, it is only ‘strong’ contribution to one of the purposes that precludes grey belt, and the scope to conclude strong performance is quite narrow on the basis of the criteria set out in the PPG. Key points to note include:

- Purpose A – only land around a ‘large built-up area’ makes a contribution.
- Purpose B – only land that is between two ‘towns’ in close proximity (N.B. one or both might also be a large built up area) has potential to make any contribution.
- Purpose D – whilst all towns will have a degree of historic interest, there is a high bar to defining ‘historic towns’ for the purposes of GBA.

In **Section 3** we define 26 towns and identify that 16 of these are additionally a large built-up area and 10 are historic towns. It can be noted that there is a need to account for several settlements outside but close to Buckinghamshire.

**Section 4** presents the assessment of AAs in terms of the three relevant Green Belt purposes, drawing on the criteria in the PPG. In conclusion, of the 808 AAs:

- Purpose A – 149 make a strong contribution (8% of the study area)
- Purpose B – 55 make a strong contribution (9% of the study area)
- Purpose D – 17 make a strong contribution (1% of the study area)

Overall, 205 out of 808 AAs make a strong contribution to one or more purposes such that they are not grey belt, which equates to 17% of the study area.

It can also be noted that a further 313 AAs, whilst not making a strong contribution to any of the purposes, do make a moderate contribution to one or more of the purposes (58% of the study area).

N.B. the 'study area' comprises the Buckinghamshire Green Belt plus several modest areas outside of Buckinghamshire where AAs naturally cross over the administrative boundary. 96% of the study area is within Buckinghamshire.

Having assessed the contribution of AAs to the three relevant Green Belt Purposes, **Section 5** deals with the next step in the process, which the PPG explains as:

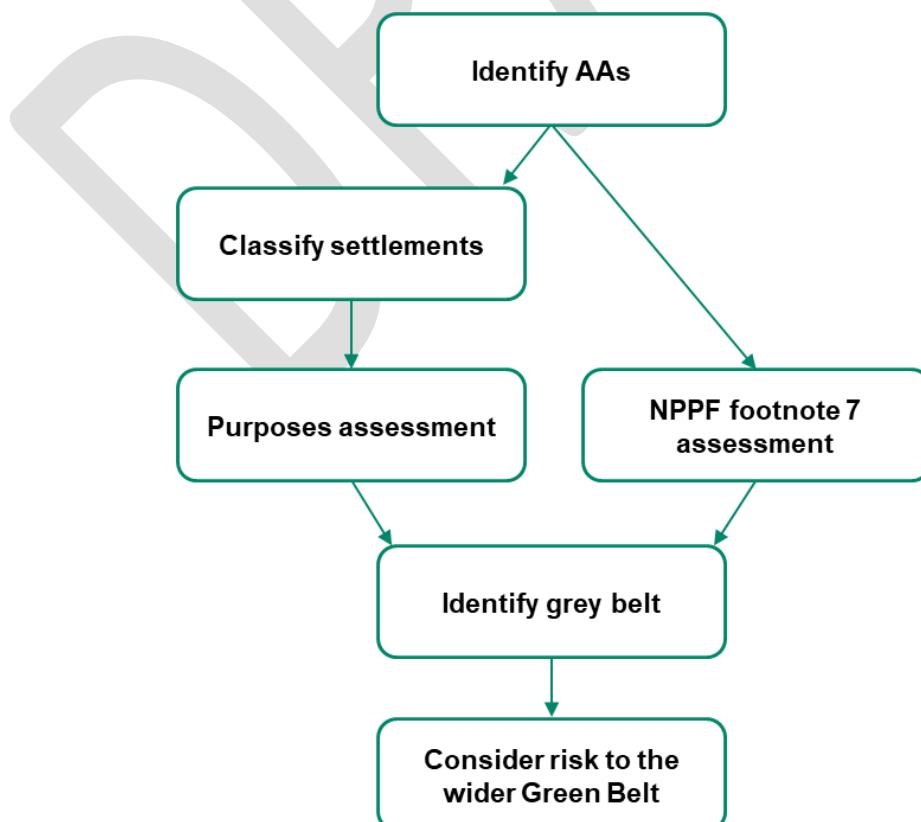
*"consider whether applying the policies relating to the areas or assets of particular importance in footnote 7 to the NPPF... would potentially provide a strong reason for refusing or restricting development of the [AA]."*

We refer to this as the 'NPPF footnote 7 assessment' stage.

As part of this, a key point to note is that the Chilterns National Landscape, which covers around 66% of the study area, is a footnote 7 designation, plus there is a need to factor in the sensitivity of its setting. Wider footnote 7 designations then cover biodiversity, flood risk, the historic environment, irreplaceable habitat and Local Green Space. These wider designations cover a small proportion of the study area, but the area of constraint can often extend beyond the designation itself.

As an initial methodological point, it is important to be clear that the purposes assessment (Section 4) and the footnote 7 assessment (Section 5) are parallel rather than sequential stages. This is explained in Figure ES.1.

**Figure ES.1: Summary of the method and report structure**



Further points on the NPPF footnote 7 assessment methodology are as follows:

- For each category of footnote 7 designation, the aim is to categorise AAs as either: A) constrained; B) provisionally constrained;<sup>1</sup> or C) unconstrained.
- A staged approach to assessment is taken whereby the footnote 7 designation categories are considered in turn and a conclusion that an AA is 'constrained' at one stage means that the AA need not proceed to subsequent stages.
- NPPF footnote 7 assessment is complex and what can be achieved within the scope of this GBA is limited, hence it is important to be clear that there will be a need for follow-on work, including accounting for specific site options and scheme proposals.<sup>2</sup> In turn, it is often appropriate to conclude 'provisionally constrained' within the scope of this GBA, i.e. ahead of further work. In other words, a cautious approach is taken to concluding that any AA is 'constrained' or 'unconstrained'.

The assessment finds that:

- 501 AAs are 'constrained' (83% of the study area) and so not grey belt.
- 265 AAs are 'provisionally constrained' (15% of the study) such that they are not grey belt but can still be provisional grey belt subject to the purposes assessment.
- 42 AAs are 'unconstrained' (2% of the study area) such that they can be grey belt subject to the purposes assessment.

The primary factor is the National Landscape (NL), with 66% of the study area 'constrained' on this basis. Outside of the NL 48% of the area is constrained and, in this regard, it is important to note that within the south of Buckinghamshire (the main area outside of the NL) there is: a very high density of ancient woodland; a high density of biodiversity sites including Burnham Beeches SAC; major flood risk zones; and a high density of heritage assets including 14 Registered Parks and Gardens.

**Section 6** of the main report brings together the purposes assessment (Section 4) and the footnote 7 assessment (Section 5) to reach overall conclusions as follows:

- 567 AAs are **not grey belt** due to contributing strongly to one or more of the relevant Green Belt purposes and/or being NPPF footnote 7 'constrained'. This equates to 86.4% of the study area.
- 208 AAs are **provisional grey belt** due to not contributing strongly to any of the Green Belt purposes but being NPPF footnote 7 'provisionally constrained'. This equates to 11.9% of the study area.
- 33 AAs are **grey belt** due to not contributing strongly to any of the purposes and being NPPF footnote 7 'unconstrained'. This equates to 1.8% of the study area.

As such, 13.7% of the study area is identified as grey belt or provisional grey belt.

Findings of the assessment are summarised below in Figure ES.2 and Table ES.1.

<sup>1</sup> The PPG explains that where footnote 7 constraints apply "*it may only be possible to provisionally identify such land as grey belt in advance of more detailed specific proposals.*" This suggests a need to consider categorising AAs as "provisionally unconstrained, but we feel that "provisionally constrained" represents clearer terminology.

<sup>2</sup> In practice sites will often come forward for consideration that comprise only part of an AA.

There are three final points to note:

- Outside of the NL 40.6% of the area is grey belt or provisional grey belt (5.3% grey belt and 35.3% provisional grey belt).
- If footnote 7 constraint were to be disapplied entirely then 83% of the study area would be grey belt (with no provisional grey belt).
- As a caveat, it is important to reiterate that this is a strategic study in the sense that: A) its focus is on AAs not site options or scheme proposals; and B) the NPPF footnote 7 assessment is unavoidably somewhat limited in its scope.

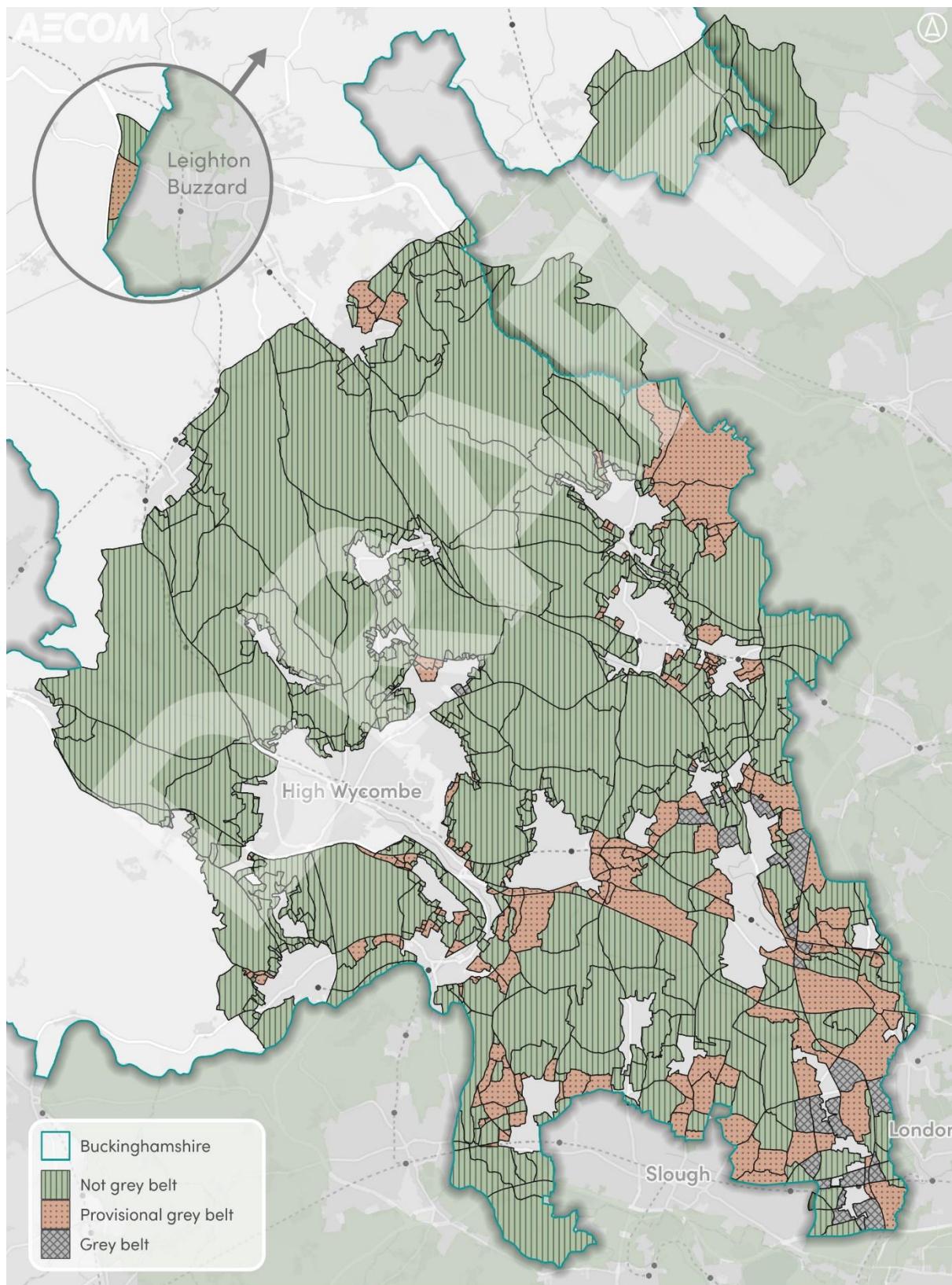
Finally, **Section 7** within the report deals with the final step in the GBA process prescribed by the PPG: *“identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan”*.

Specifically, Section 7 considers sub-areas within the Buckinghamshire Green Belt where the GBA identifies significant AAs as either grey belt or provisional grey belt and, for each sub-area, considers whether the effect of releasing AAs in combination could be to ‘fundamentally undermine’ the remaining Green Belt.

This is an initial discussion of potential issues / risks ahead of further work to explore realistic growth options and scenarios through the local plan-making process.

Attention is focused primarily on land outside of the NL, given that growth in the NL will typically be of a limited scale that generates commensurately limited ‘fundamentally undermining’ concerns. However, a number of sensitive settlement gaps within the NL are highlighted, including along the Metropolitan Line corridor.

Outside of the NL, there are clear strategic considerations around both: A) A40 / M40 / Chiltern Line corridor (also the Wye Valley); and B) the A4 / M4 / Elizabeth Line / Great Western Mainline / River Thames corridor. In both areas strategic growth options must be carefully considered aimed at avoiding fundamentally undermining this sector of the London Green Belt, and also with a view to realising growth opportunities including in terms of green / blue infrastructure.

**Figure ES.2: Grey belt and provisional grey belt identified through this GBA**

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**Table ES.1: Summary of the process for assessing all 808 AAs**

| Assessment   | Notes                        | Number of AAs |
|--|------------------------------|---------------|
| <b>Green Belt Purpose A</b>                            |                              | <b>808</b>    |
| Strong   | Not grey belt                | 149           |
| Moderate   | Can be grey belt             | 214           |
| Weak or none   | Can be grey belt             | 445           |
| <b>Green Belt Purpose B</b>                            |                              | <b>808</b>    |
| Strong   | Not grey belt                | 55            |
| Moderate   | Can be grey belt             | 178           |
| Weak or none   | Can be grey belt             | 575           |
| <b>Green Belt Purpose D</b>                            |                              | <b>808</b>    |
| Strong   | Not grey belt                | 17            |
| Moderate   | Can be grey belt             | 27            |
| Weak or none   | Can be grey belt             | 764           |
| <b>Footnote 7 stage 1:<br/>National Landscape (NL)</b> |                              | <b>808</b>    |
| Constrained  | Not grey belt                | 379           |
| Provisionally constrained                              | Can be provisional grey belt | 9             |
| Unconstrained  | Can be grey belt             | 420           |
| <b>Footnote 7 stage 2:<br/>Local Green Space (LGS)</b> |                              | <b>429</b>    |
| Constrained  | Not grey belt                | 3             |
| Provisionally constrained                              | Can be provisional grey belt | 1             |
| Unconstrained  | Can be grey belt             | 425           |
| <b>Footnote 7 stage 3:<br/>Flood risk</b>              |                              | <b>426</b>    |
| Constrained  | Not grey belt                | 27            |
| Provisionally constrained                              | Can be provisional grey belt | 12            |
| Unconstrained  | Can be grey belt             | 387           |

| Assessment  | Notes   | Number of AAs |
|---|---|---------------|
| <b>Footnote 7 stage 4:<br/>Biodiversity</b>                       |   | <b>399</b>    |
| Constrained   | Not grey belt   | 30            |
| Provisionally constrained   | Can be provisional grey belt  | 253           |
| Unconstrained   | Can be grey belt  | 116           |
| <b>Footnote 7 stage 5:<br/>Irreplaceable habitat</b>              |   | <b>369</b>    |
| Constrained   | Not grey belt   | 31            |
| Provisionally constrained   | Can be provisional grey belt  | 66            |
| Unconstrained   | Can be grey belt  | 272           |
| <b>Footnote 7 stage 6:<br/>Historic environment</b>               |   | <b>338</b>    |
| Constrained   | Not grey belt   | 31            |
| Provisionally constrained   | Can be provisional grey belt  | 109           |
| Unconstrained   | Can be grey belt  | 198           |
| <b>Footnote 7 stage 7:<br/>NL setting</b>                         |   | <b>307</b>    |
| Constrained   | Not grey belt   | N/a           |
| Provisionally constrained   | Can be provisional grey belt  | 89            |
| Unconstrained   | Can be grey belt  | 218           |
| <b>Overall conclusion<br/>(combining the two<br/>assessments)</b> |   | <b>808</b>    |
| Not grey belt   | Makes a strong contribution to one or more of the Green Belt purposes and/or 'constrained' in terms of NPPF footnote 7. | 567           |
| Provisional grey belt   | Does not make a strong contribution to any of the Green Belt purposes but 'provisionally constrained'.                  | 208           |
| Grey belt   | Does not make a strong contribution to any of the Green Belt purposes and 'unconstrained'.                              | 33            |

