STRATEGIC BRIEFING

Land buying in the new planning era.

Grey belt, brownfield-first, mandatory targets and the new NPPF. What has actually changed and how to make decisions inside it.

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Inside this briefing.

The land market at mid-2026 is a market of two speeds. Strategic land is competitively bid; SME land buying is cautious; brownfield carries viability pressure that policy reform is only slowly relieving. This briefing sets out what the revised NPPF actually changes on the ground, how grey belt is operating in practice, what brownfield-first means combined with other reforms, and how to structure land buying decisions in a market that has genuinely moved.

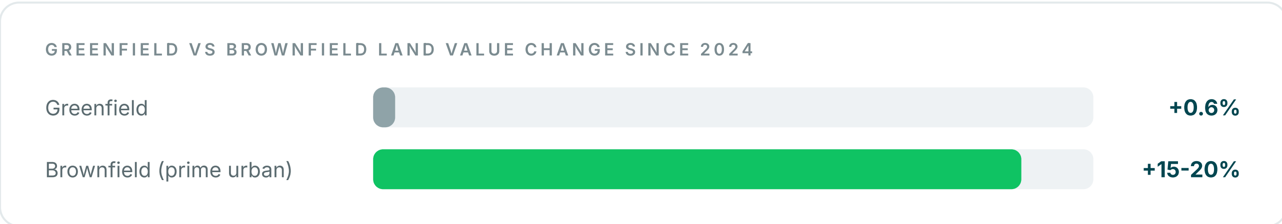
Who this is for

Housebuilder land directors, strategic land teams, finance directors, boards, development directors, principal contractors evaluating land partnerships, housing associations acquiring land, and investors underwriting land purchases.

The mid-2026 land market at a glance.

The land market has stabilised after two years of volatility. Greenfield values in the year to mid-2026 rose around 0.6%, effectively flat. Brownfield values have risen 15 to 20% since 2024 in prime urban locations, driven by policy support and institutional interest. Strategic land is the most active segment, with competitive bidding on prime sites.

Beneath the stability the market is polarised. Larger developers pursue grey belt holdings while policy is still crystallising; smaller developers stay with consented or near-consented land. LandLister's late-2025 survey found 43% of builders expected starts to decline in Q4 2025 and 45% anticipated land values falling further. GCHU modelling found that hitting 1.5m homes needs brownfield completions exceeding 156,000 a year from 2027, matching the 2008 peak.



+0.6%
greenfield land value change, year to mid-2026

15-20%
brownfield land value rise since 2024, prime urban

156,000
annual brownfield completions needed from 2027 (2008 peak)

Polarised, not depressed

Strategic land is competitive. SME land buying is cautious. Brownfield is rising in value but delivery capacity is not yet where the target requires. Knowing which side of the polarisation you sit on is the first step.

The revised NPPF: what it changed.

The revised NPPF, published December 2024 and updated since, restructured the planning environment in ways that directly affect land buying.

Mandatory targets return	Every authority must maintain an up-to-date local plan aligned to a mandatory target using the updated Standard Method, with intervention for those without one. Authorities behind target are under measurable pressure to grant permissions.
Five-year land supply	Reintroduced. Authorities that cannot demonstrate a defensible five-year supply face the presumption in favour of sustainable development on individual applications.
Grey belt introduced	A new category within Green Belt no longer of historical, agricultural or ecological significance. Release is subject to "golden rules" including affordable housing quotas.
Brownfield-first presumption	Permission should be granted for brownfield residential development unless substantial harm is demonstrated, a meaningful strengthening with real local authority discretion.
Standard method uplift	Target numbers rose substantially in many areas, unevenly, some by 40% or more, others more modestly.

Authority-level analysis, not national assumptions

Authorities are under pressure to grant permissions, but the practical effect depends on which authority, which target position, which land type and which infrastructure conditions apply.

Grey belt in practice.

Grey belt is the most novel of the reforms and the one where practical experience is still developing.

What qualifies	Green Belt land not making a significant contribution to Green Belt purposes: disused industrial sites, former petrol stations, neglected car parks, low-value agricultural land.
The golden rules	50% affordable housing, appropriate infrastructure and accessible green space. A site attractive on grey belt grounds can become marginal once these are priced in.
How it is playing out	Larger developers pursue grey belt aggressively near settlements with supportive authorities; others push back on ambiguous sites. Precedent is still being set through appeals.
What to check	Does the site clearly qualify or is it borderline? Can the golden rules be met at viability? What is the authority's stated position? What infrastructure contribution applies?

A genuine opening, not a general one

Sites that clearly qualify with achievable golden rules are the opportunity. Sites that require the definition to stretch or the rules to bend are not. Discipline in telling them apart is the essential skill.

Brownfield-first and its practical limits.

The strongest brownfield policy signal in over a decade, but bounded by real delivery constraints.

What it means in practice	The burden of proof flips: authorities should approve unless substantial harm is demonstrated, rather than developers arguing the case for development.
What "brownfield" captures	Land with existing structures, hardstanding or historical development use. Not undeveloped urban land, gardens or agricultural land, even if adjacent to development.
Practical constraints	Remediation from £10,000 to over £100,000 per acre, demolition, under-provisioned infrastructure. The BSL 50% discount and proposed BNG exemption materially improve the picture.
The delivery capacity question	156,000 annual brownfield completions are needed from 2027, matching the 2008 peak. Policy sets the direction; capacity determines whether it produces homes.

The strongest brownfield case in a decade

Brownfield-first, combined with the BSL discount and potential BNG exemption, produces the strongest case in over a decade. The challenge is capacity, not policy. Land buyers who can genuinely deliver will be advantaged.

Mandatory targets and the local plan wave.

The reintroduction of mandatory targets is producing a wave of local plan updates through 2026 and 2027.

The update cycle	Every authority is working toward an up-to-date local plan. The first conclude 2026 to 2027; the full cycle runs into 2028 for the slowest authorities.
Existing land holdings	Land held under current plans may be reallocated, or see density, affordable quota or infrastructure conditions change. Map your portfolio against the update cycle.
New land	Land in areas whose plans are still being prepared may become available on more favourable terms once mandatory targets are set. Timing acquisition against the cycle is a specific decision.
Where the biggest changes sit	Only 3.4% of the English population lives somewhere on track to meet its housing requirement, rising to 12% optimistically. The other 88 to 96% is where the opportunities of the next parliament sit.

The single biggest determinant of opportunity

Land buyers who track the local plan wave authority by authority will identify sites and windows that portfolio-level strategy misses.

Combined effects: what this means for land buying.

The reforms interact. The combined effect on a specific site differs from the sum of the individual signals.

The strongest opportunities

Brownfield sites in target-lagging authorities, where brownfield-first applies, the local plan is updating, the BSL discount applies, and a BNG exemption (if enacted) would help. Sites qualifying across all carry favourable planning and materially improved viability.

The traps

Grey belt sites struggling to meet golden rules. Greenfield in over-target authorities that remain politically resistant. Brownfield with material remediation issues that outweighs the policy tailwinds.

Disciplines that now matter more

Authority-level analysis, not the national picture. Integrated viability modelling that builds NPPF position, BSL, BNG, affordable requirement and infrastructure in from the start. Timing awareness around BSL (1 Oct 2026), BNG changes (6 Aug and 2 Nov 2026) and local plan dates.

A redistribution, not a general improvement

Brownfield gains relative to greenfield. Target-lagging authorities gain relative to target-meeting ones. Sites meeting all the criteria gain relative to sites where criteria conflict. Portfolio-level assumptions no longer hold.

A framework for the new environment.

Six analytical steps, applied in sequence, before the residual land value number means anything.

1	**Authority analysis:** target, delivery position, local plan status, five-year land supply.
2	**Site classification:** brownfield, grey belt, allocated greenfield, unallocated greenfield, or windfall.
3	**Policy layer:** which presumptions and golden rules apply, and which are supportive vs constraining.
4	**Cost layer:** BSL, BNG, affordable quota and infrastructure contribution, using site-specific rates.
5	**Timing layer:** submission timing against commencements, plan updates and authority windows of receptivity.
6	**Residual land value:** only reliable after Steps 1 to 5 are complete.

An update to the discipline, not new work

Teams that update the framework will operate at a competitive advantage. Teams that continue with pre-reform heuristics will make expensive mistakes that only become visible later.

Sources and closing note.

PRIMARY SOURCES

Planning and Infrastructure Bill 2025. NPPF, revised December 2024 and subsequent updates. MHCLG Standard Method for housing need. MHCLG local plan status and delivery data. Homes England SAHP prospectus and delivery data.

SECTOR ANALYSIS

Global Centre on Healthcare and Urbanisation, November 2025. LSH, "Time to Build", November 2025. LandLister UK Land Market Overview 2026. BuyLand.co.uk brownfield vs greenfield guide. Britain Remade planning analysis. Urbanist Architecture on brownfield planning.

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