

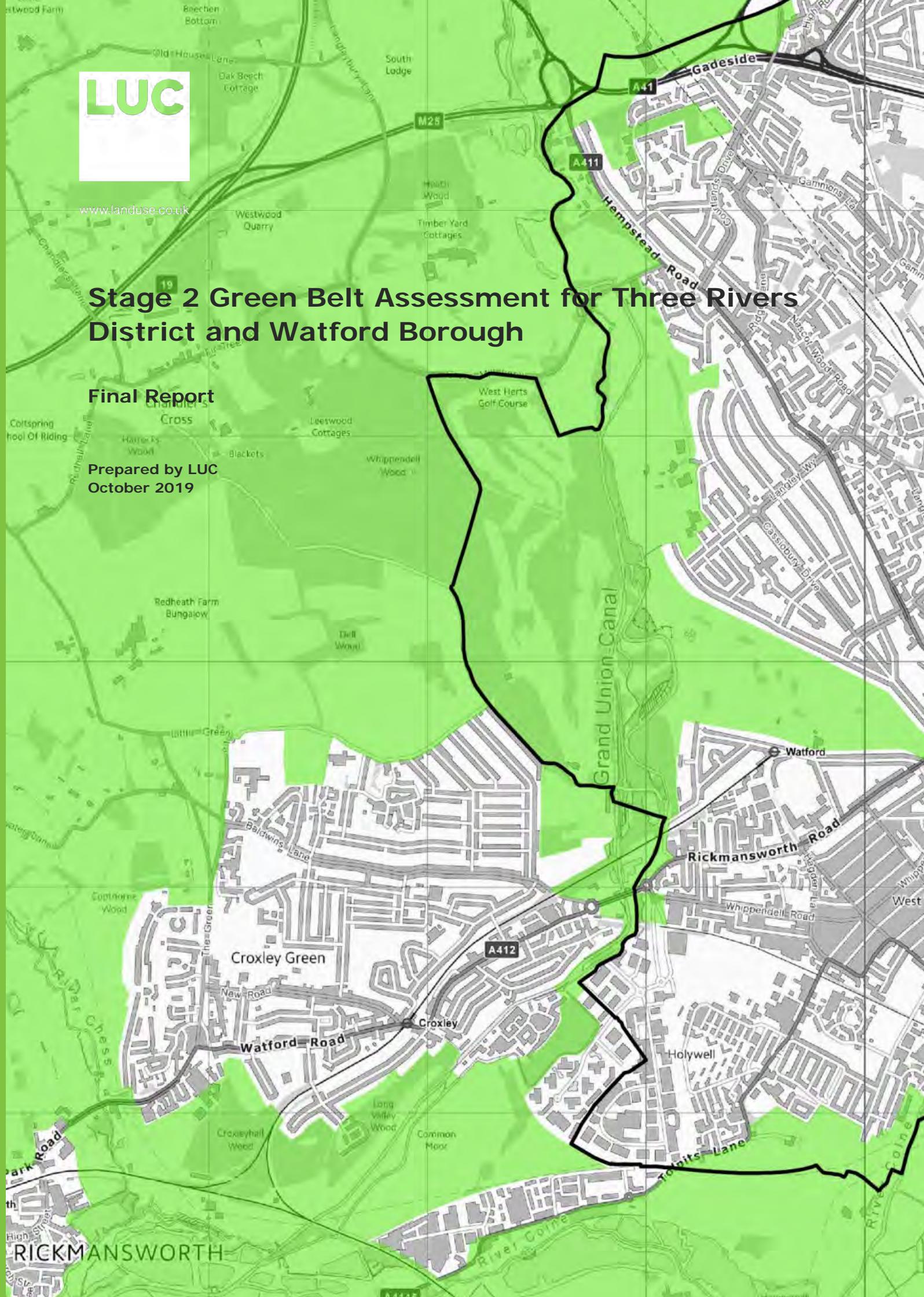


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Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough

Final Report

Prepared by LUC
October 2019



RICKMANSWORTH

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Executive Summary

Introduction

- i. LUC was commissioned by Three Rivers District Council and Watford Borough Council to undertake an assessment of the Green Belt. The study will form an important piece of evidence for the emerging Three Rivers and Watford Local Plans. This report sets out the findings of the Stage 2 Green Belt assessment, which considers the relative value of land in terms of harm to the Green Belt purposes, as defined in the National Planning Policy Framework (NPPF), that would result from the release of designated land.

Study Scope

- ii. A Stage 1 Green Belt Study was undertaken in 2017 by Amec Foster Wheeler. This assessed the whole of the Green Belt in Three Rivers and Watford in terms of its contribution to the five purposes of the Green Belt, as set out in the NPPF. The Stage 1 study recognised that further, more specific analysis of Green Belt would be required due to the pressure for development to meet housing needs in Three Rivers and Watford.
- iii. The Stage 2 Green Belt study considered the extent to which the release of different areas of land affects the contribution to the Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the adjacent Green Belt. This process involved an assessment of the *harm* to Green Belt purposes of releasing land for development to facilitate the expansion of inset settlements (whether within, or close to the District and Borough) or of the village of Bedmond (which was identified in the Stage 1 Study as having potential to be inset into the Green Belt).
- iv. The extent of the assessment area was determined incrementally through the analysis process, starting with all Green Belt land within Three Rivers and Watford adjacent to inset settlements or to Bedmond, extending out to boundary features beyond which release of land was considered to result in an increase in harm level. Where this increased harm level was rated less than *high*, land extending out to the next significant boundary feature was assessed as a separate land parcel.
- v. The Stage 2 assessment followed the following three key steps:
 - Step 1: Considered the impact on the contribution to the NPPF purposes.
 - Step 2: Assessed the potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
 - Step 3: Assessed the overall Green Belt harm and any variations of harm within the 'assessment zone'.

Further details on the methodology used to assess the potential harm to the Green Belt purposes of releasing Green Belt land can be found in **Chapter 3**.

Findings

- vi. A total of 152 parcels were identified as part of the Stage 2 study, reflecting harm to Green belt purposes rated on a 7-point scale of *very high*, *high*, *moderate-high*, *moderate*, *low-moderate*, *low* and *very low*. Where there are notable variations in harm within a parcel, but no clear boundary to mark a distinction, commentary is provided regarding the potential to limit harm through a more limited release of land. For parcels beyond which harm was assessed as *high* or

very high, text to support this analysis is provided under the heading 'harm beyond outer boundary'.

- vii. Consideration of the *harm* to Green Belt that could result from the release of land for development is an essential part of establishing the exceptional circumstances for making alterations to Green Belt boundaries. However, there are other important factors that need to be considered, most notably sustainability and deliverability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in *high* or *very high* harm to the Green Belt. In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation.
- viii. In light of this, this assessment of harm to Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies the relative variations in the harm to the designation. **Table ES 1** sets out, for each harm rating level, the size of Green Belt land within the parcelled assessment area, and the percentage of the total parcelled area that this represents. The harm rating for release of any Green Belt land outside of this assessment area in association with expansion of inset settlements (including Bedmond if it were to be inset) would be at least *high*. No parcels were assessed to have the potential to cause *very low* harm to the Green Belt if released.

Table ES 1: Total area of land assessed at each harm rating

Harm Rating *	Total Area of Land (excluding absolute constraints)	
	Area (ha)	Percentage of Parcelled Green Belt
Very High	231.7	9.3
High	679.4	27.4
Moderate-High	790.7	31.8
Moderate	487.7	19.6
Low-Moderate	244.2	9.8
Low	49.5	2.0

*Note that where an area is assessed in the context of release from more than one settlement, and the resultant harm ratings are different, it is the lowest of the ratings that is reported in this table.

- ix. The findings of the assessment of harm are summarised in **Chapter 4** and detailed findings of the assessment of harm are included in **Appendix 1**.

1 Introduction

- 1.1 LUC was commissioned by Three Rivers District Council and Watford Borough Council to undertake an assessment of the Green Belt. This report sets out the findings of the Stage 2 Green Belt assessment which identifies the harm to the Green Belt that would result from the release of land adjacent to the existing urban areas within the two authorities. The study will form an important piece of evidence for the emerging Three Rivers and Watford Local Plans.

Study aims and objectives

- 1.2 The overall aim of the study was to undertake an independent, robust and transparent assessment of the Green Belt within Three Rivers and Watford (illustrated on **Figure 1.1**). A Stage 1 Green Belt Study was undertaken in 2017 by Amec Foster Wheeler. This assessed the whole of the Green Belt in Three Rivers and Watford in terms of its contribution to the five purposes of the Green Belt, as set out in the National Planning Policy Framework (NPPF), namely:
- to check the unrestricted sprawl of large built up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.3 The Stage 1 study recognised that further, more specific analysis of Green Belt would be required due to the pressure for development to meet housing needs in Three Rivers and Watford:
- “... conclusions drawn as part of the evaluation of the strategic contribution of the Green Belt will to some extent inevitably be different to conclusions reached on their localised purposes (for example in relation to specific settlements). Where necessary as part of more refined work, sub-parcels (for example down to the field scale) can be identified in order to help explore locally-specific issues and/or impacts.”*
- 1.4 The Stage 2 Study involved a more focussed assessment of the potential harm to the Green Belt purposes of releasing Green Belt land within Three Rivers and Watford to facilitate the expansion of inset settlements (whether within, or close to the District and Borough) or of the village of Bedmond (which was identified in the Stage 1 Study as having potential to be inset into the Green Belt). This more targetted approach is informed by the requirements of the NPPF and consideration of Local Plan Examination Inspectors’ reports and case law. Stage 1 has ensured that the Study is suitably comprehensive, i.e. that all Green Belt is considered, but Stage 2 provides more specific information on Green Belt harm, to be weighed up by the Councils alongside sustainability and deliverability considerations in order to make decisions regarding the potential release of Green Belt land.
- 1.5 The assessment of harm considers the extent to which the release of different areas of land reduces the contribution to the Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the strength of the adjacent Green Belt. Ratings and supporting analysis are provided in relation to each assessed Green Belt purpose, and considered in combination to arrive at a single overall harm rating.
- 1.6 The extent of the assessment area was determined incrementally through the analysis process, starting with all Green Belt land within Three Rivers and Watford adjacent to inset settlements or to Bedmond, extending out to boundary features beyond which release of land was considered to result in an increase in harm level. Where this increased harm level was rated less than *high*, land extending out to the next significant boundary feature was assessed as a separate land parcel,

but where a boundary was judged to mark a change to *high* or *very high* harm this rating would apply to all land beyond that boundary, so no further parcel subdivision was required.

- 1.7 In identifying areas which would, if released, result in greater harm to Green Belt purposes, the assessment can, alongside wider analysis relating to other environmental/sustainability considerations (e.g. landscape sensitivity, traffic impact, provision of services), help to inform decisions regarding the relative merits of different locations for potential allocation of land to meet housing need, and any mitigation which might need to accompany it. This analysis of harm and mitigation is consistent with the latest case law on the matter, notably *Calverton Parish Council v Greater Nottingham Councils & others* (2015)¹, which found that planning judgements setting out the 'exceptional circumstances' for the amendment of Green Belt boundaries require consideration of the 'nature and extent' of harm to the Green Belt and 'the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent'.

Duty to Cooperate engagement

- 1.8 The Green Belt is a strategic matter in terms of the requirements of Duty to Cooperate. Paragraph 156 of the NPPF sets out the strategic issues where cooperation might be appropriate, and includes a number of cross boundary issues that are closely linked to the Green Belt. A method statement setting out the proposed assessment approach for the Three Rivers and Watford Stage 2 Green Belt Study was circulated to the Councils' key stakeholders with whom the Councils' have a duty to cooperate². This included the following:
- Hertsmere Borough Council;
 - Dacorum Borough Council;
 - St Albans City and District;
 - Welwyn Hatfield Borough Council;
 - London Borough of Harrow;
 - London Borough of Hillingdon;
 - Chiltern District Council;
 - Hertfordshire County Council;
 - South Buckinghamshire District Council; and
 - Buckinghamshire County Council.
- 1.9 Stakeholders were invited to comment on the draft methodology. A response was received from Hertsmere Borough Council which has been taken into account in the preparation of this report.

Report authors

- 1.10 The report has been prepared by LUC, which has advised developers and local authorities across the country on Green Belt issues, as well as undertaking numerous independent Green Belt studies at a range of scales. We have completed Green Belt Assessments or Reviews on behalf of over 40 Local Authorities throughout England.

Report structure

- 1.11 The remainder of this report is structured as follows:

¹ <http://www.bailii.org/ew/cases/EWHC/Admin/2015/1078.html>

² Section 110 of the Localism Act (2011).

Chapter 2: sets out the background to the Stage 2 study and the policy context.

Chapter 3: outlines the assessment methodology.

Chapter 4: summarises the findings of the Stage 2 Green Belt assessment.

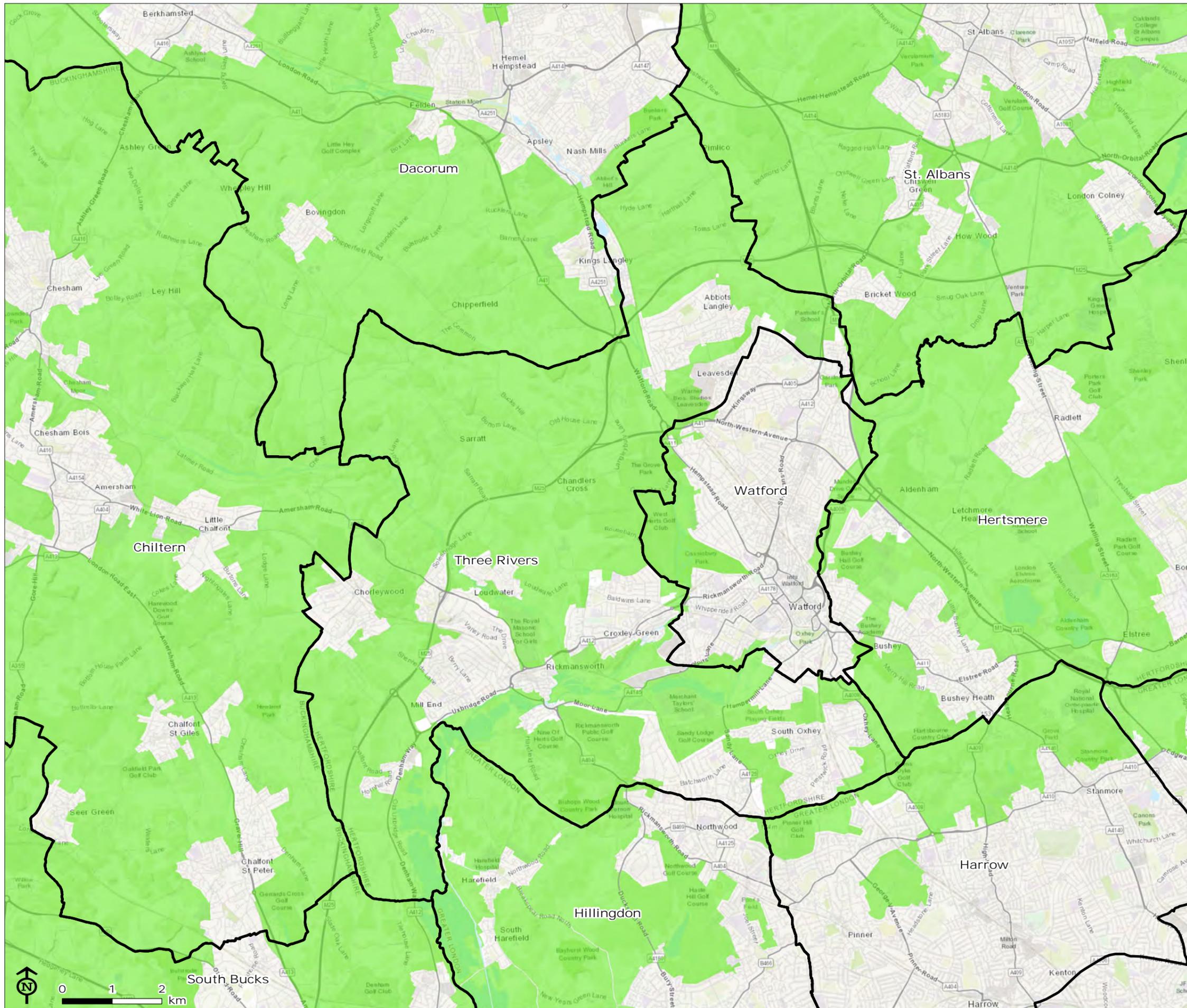
Chapter 5: sets out potential design principles for minimising harm to the Green Belt and other considerations relating to enhancing remaining Green Belt land.

1.12 **Appendix 1** – sets out the detailed findings of the Stage 2 Green Belt assessment

Three Rivers and Watford Green Belt Review Stage 2

Figure 1.1
Green Belt Context

-  District Boundary
-  Green Belt



Map Scale @A3: 1:75,000



2 Policy Context

Introduction

- 2.1 This chapter summarises the origins of the local Green Belt and sets out National Green Belt policy, relevant guidance and case law and the local planning policy context.

Origins of the Metropolitan and Hertfordshire Green Belt

- 2.2 During the Second World War, the newly formed Ministry of Town and Country Planning commissioned Professor Patrick Abercrombie to prepare an advisory plan for the future growth of Greater London. The Ministry gave its formal approval of Abercrombie's Green Belt proposals and the 1947 Town and Country Planning Act allowed local authorities to include Green Belt proposals in their development plans, resulting in the designation of the Metropolitan Green Belt.
- 2.3 Hertfordshire County Council initially designated the south of the county as Green Belt as part of the Hertfordshire County Development Plan approved in 1958. The Hertfordshire County Structure Plan in 1979 approved in principle the designation of a Green Belt as part of the Metropolitan Green Belt about 12 – 15 miles deep with limited extensions along the main radial transport corridors³. Approximately 55% of Hertfordshire is designated Green Belt (90,000ha)⁴.

Three Rivers District and Watford Borough Green Belt

- 2.4 The Green Belt within Three Rivers District and Watford Borough covers almost all of the land which is not part of an urban settlement (e.g. a town or large village). There are a number of smaller settlements which are included in the Green Belt (for example Sarrat, Bedmond, Heronsgate, West Hyde, Chandlers Cross and Belsize), along with isolated dwellings and buildings and land which is not open countryside but is undeveloped.
- 2.5 The District of Three Rivers and Borough of Watford lie on the edge of Greater London and their character, in particular Three Rivers, reflects the transition from more urban to more rural. The Green Belt itself moves from being more fragmented, lying between suburbs of outer London, to being more contiguous in nature as it covers areas of wider countryside.
- 2.6 Being on the edge of London, the Green Belt in Three Rivers and Watford varies in character and uses. Much of the land would be regarded as open countryside and is used for farming - arable and pasture. This is particularly apparent to the north and west as land becomes less built up and more open the further away from it London it becomes. Typical urban fringe uses – parks, golf courses and other recreational land, can be found on the outskirts of built up areas, in particular Watford. There are also woodland areas present, some reasonably extensive and dense, for example Lees Wood on the eastern edge of Three Rivers, and other smaller but still dense areas which are common to the north west. There are various areas of importance for biodiversity scattered around the District and Borough, including Local Nature Reserves (Chorleywood House Estate, Chorleywood Common, Rickmansworth Aquadrome, Stockers Lake, Croxley Common Moor, The Withey Beds, Batchworth Heath, Lairage Land, Oxhey Woods, Prestwick Road Meadows, Cassiobury Park, and Garston Park) and SSSIs (Sarratt Bottom, Whippendell Wood and Croxley Common Moor). The total area covered by Local Nature Reserves is 398.2 ha, and by SSSIs is 112.09 ha. Together these designations cover 6.6% of the Green Belt in Three Rivers and Watford.

³ Three Rivers and Watford Green Belt Review – Strategic Analysis FINAL, Amec Foster Wheeler

⁴ Three Rivers and Watford Green Belt Review – Strategic Analysis FINAL, Amec Foster Wheeler

National Green Belt Policy

- 2.7 The Metropolitan Green Belt as a standalone concept was first suggested by Raymond Unwin in 1933 as a 'green girdle'. In 1935 the London County Council put forward a scheme *'to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable'*. This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act, under which 14,400 hectares of land around London were purchased by the London County Council and adjacent counties, either individually or jointly.
- 2.8 In 1955 the Government established (through Circular 42/55) the three main functions of the Green Belt as:
- Checking growth of large built-up areas;
 - Preventing neighbouring settlements from merging; and
 - Preserving the special character of towns.
- 2.9 Emphasis upon the strict control of development and the presumption against building in the Green Belt except in special circumstances was set out through further Government Green Belt guidance in 1962. The essential characteristic of Green Belts as permanent with boundaries only to be altered in exceptional circumstances was established through Circular 14/84.
- 2.10 In January 1988 PPG2 Green Belts (Planning Policy Guidance Note 2), subsequently replaced in 1995 and further amended in 2001, explicitly extended the original purposes of the Green Belt to add:
- to safeguard the surrounding countryside from further encroachment; and
 - to assist in urban regeneration (subsequently replaced in 1995 and further amended in 2001).
- 2.11 PPG2 was replaced through the publication of the National Planning Policy Framework (NPPF) in March 2012⁵, revised and re-published in July 2018⁶ and in February 2019⁷, and this document currently provides national Green Belt policy. The current position of the Government in relation to the Green Belt, provided through the NPPF and PPG is set out below.

National Planning Policy Framework

- 2.12 Government policy on the Green Belt is set out in chapter 13 of the adopted National Planning Policy Framework (NPPF)⁸. Paragraph 133 of the NPPF states that *"the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence"*.
- 2.13 This is elaborated in NPPF Paragraph 134, which states that Green Belts should serve five purposes, as set out below.

The purposes of Green Belt

1. To check the unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns merging into one another.

⁵ Department of Communities and Local Government (2012) National Planning Policy Framework Available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

⁶ Department of Communities and Local Government (2018) National Planning Policy Framework Available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

⁷ Department of Communities and Local Government (2019) National Planning Policy Framework. Available at: www.gov.uk/government/publications/national-planning-policy-framework--2.

⁸ Department of Communities and Local Government, 2018, National Planning Policy Framework [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733637/National_Planning_Policy_Framework_web_accessible_version.pdf

3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 2.14 The NPPF emphasises in Paragraph 135 and 136 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for the Green Belt and settlement policy. It goes on to state that *“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.”*
- 2.15 Paragraph 137 of the NPPF requires that the “strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development” before concluding that the exceptional circumstances exist (Paragraph 137), specifically whether the strategy:
- *“makes as much use as possible of suitable brownfield sites and underutilised land;*
 - *optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and*
 - *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”*
- 2.16 Paragraph 138 of the NPPF indicates that “when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and / or is well served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”⁹
- 2.17 Paragraph 139 of the NPPF suggests that Local Planning Authorities may wish to identify areas of ‘safeguarded land’ between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period.
- 2.18 Current guidance therefore makes it clear that the Green Belt is a strategic planning tool designed primarily to prevent the spread of development and the coalescence of urban areas. To this end, land should be designated because of its position, rather than its landscape quality or recreational use. However, the NPPF states *“local planning authorities should plan positively to enhance the beneficial use of the Green Belt, 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”* (Paragraph 141).
- 2.19 It is important to note, however, that these positive roles should be sought for the Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by being kept permanently open. Openness is not synonymous with landscape character or quality.

⁹ This NPPF requirement will be met as part of the wider Local Plan preparation process, although the findings of this review will form part of this.

- 2.20 Paragraph 143 and 144 state that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances... ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.”
- 2.21 Paragraphs 145 sets out the types of development that are appropriate in the Green Belt:
- *“buildings for agriculture and forestry;*
 - *appropriate facilities for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
 - *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
 - *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
 - *limited infilling in villages;*
 - *limited affordable housing for local community needs under policies set out in the development plan; and*
 - *limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
 - *Not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*
 - *Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*
- 2.22 Paragraph 146 sets out other forms of development that are not inappropriate provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in the Green Belt. These are:
- *“mineral extraction;*
 - *engineering operations;*
 - *local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - *the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - *material changes in the use of land (such as changes of use for outdoor sport or recreation or for cemeteries or burial grounds); and*
 - *development brought forward under a Community Right to Build Order.”*
- 2.23 Neither the NPPF or the National Planning Practice Guidance (NPPG) provide any specific advice regarding a methodology for undertaking Green Belt reviews, and no reference is made to different scales of review. This lack of specific advice on the methodology of a Green Belt review has led to varying interpretations and approaches.

Planning Practice Guidance

- 2.24 The NPPF's Green Belt policies are supplemented by additional planning practice guidance. The guidance sets out some of the factors that can be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations born out through specific case law judgements. The guidance states openness is capable of having

both spatial and visual aspects¹⁰. Other circumstances which have the potential to affect judgements on the impact of development on openness include the duration of development and its remediability to the equivalent, or an improved state of, openness, and the degree of activity likely to be generated by development, such as traffic.

- 2.25 The guidance also elaborates on Paragraph 138 of the NPPF which requires local planning authorities to set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, including:
- *'new or enhanced green infrastructure;*
 - *woodland planting;*
 - *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
 - *improvements to biodiversity, habitat connectivity and natural capital;*
 - *new or enhanced walking and cycle routes; and*
 - *improved access to new, enhanced or existing recreational and playing field provision.'*
- 2.26 Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.

Other Relevant Guidance and Case Law

Planning Advisory Service Guidance

- 2.27 Neither the National Planning Policy framework (NPPF) nor National Planning Practice Guidance (NPPG) provides guidance on how to undertake Green Belt reviews. However, the Planning Advisory Service (PAS) have published a useful advice note that discusses some of the key issues associated with assessing the Green Belt.
- 2.28 The PAS Guidance¹¹ considers the way in which the five purposes of the Green Belt should be addressed, as follows:
- **Purpose 1:** To check the unrestricted sprawl of large built up areas – this should consider the meaning of the term 'sprawl' and how this has changed from the 1930s when the Green Belt was conceived.
 - **Purpose 2:** To prevent neighbouring towns from merging into one another – assessment of this purpose will be different in each case and a 'scale rule' approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead the character of the place and the land between settlements must be acknowledged. Landscape Character Assessment is therefore a useful analytical tool to use in undertaking this purpose.
 - **Purpose 3:** To assist in safeguarding the countryside from encroachment – the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.

¹⁰ Two important Planning Appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect. Further details are set out in Chapter 2 and in the case law section below.

¹¹ Planning on the Doorstep: The Big Issues – Green Belt, Planning Advisor Service (2015)

- **Purpose 4:** Preserving the setting and special character of historic towns – this applies to very few places within the country and very few settlements in practice. In most towns, there is already more recent development between the historic core and the countryside.
 - **Purpose 5:** To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.
- 2.29 It also states that the assessment of the performance of the Green Belt should be restricted to the Green Belt purposes and not consider other planning considerations, such as landscape, which should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.
- 2.30 The guidance goes on to list the types of areas of land that might make a relatively limited contribution to the Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes:
- land partially enclosed by development, i.e. where new development would effectively be ‘infill’ development;
 - land where development would be well contained by the landscape;
 - land where harm to the qualities that contributed to the distinct identity of separate settlements would be limited; and,
 - a strong boundary could be created with a clear distinction between ‘town’ and ‘country’.
- 2.31 The Planning Advisory Service has since updated their ‘Plan Making Question and Answer’ advice with regard to the assessment of the Green Belt within Local Plans¹². The service advises that Green Belt Reviews should be considered in the context of its strategic role. This indicates that Green Belts should not necessarily be just reviewed for each authority, and could include a joint methodology.

Planning Inspectorate Local Plan Examination Reports

- 2.32 Since the adoption of the National Planning Policy Framework in March 2012, there have been several important Planning Inspectorate Local Plan Examination Reports which have informed Green Belt planning and by association Metropolitan Open Land (MOL) planning¹³. These include:
- The Inspector’s preliminary conclusions (S Emerson) to Bath and North East Somerset Council (June 2012) highlighted the importance of having an *“up-to-date and comprehensive review of the Green Belt in the district is necessary to see whether all the land so designated fulfils the Green Belt purposes”*.
 - The Inspector’s report (A Thickett) to Leeds City Council (September 2014) emphasised that Green Belt studies should be *“fair, comprehensive and consistent with the Core Strategy’s aim of directing development to the most sustainable locations”*, i.e. Green Belt reviews should be ‘comprehensive’ rather than ‘selective’.
 - The Inspector’s interim views (S J Pratt) to Cheshire East Council (October 2014) and further interim views (December 2015) highlighted several flaws in the approach to the Council’s Green Belt assessment:
 - Contribution to the Green Belt purpose were not the only factors used to inform the assessment, land ownership, availability and deliverability were also considered, weighting overall Green Belt judgements against the purposes of the designation.
 - The Green Belt was divided-up in to assessment parcels inconsistently: large areas were assessed in the same way as small sites and some areas of the Green Belt were not assessed.
 - Green Belt purposes 4 and 5 were not assessed.

¹² <http://www.pas.gov.uk/pm-q-a-a-green-belt#Q:> When should you carry out a Green Belt review?

¹³ Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

- The Council's two stage Green Belt assessment update involving an initial assessment of large general areas followed by smaller parcels for the five Green Belt purposes, was subsequently approved by the Inspector. However, the Inspector emphasised the need for consistency and transparency: *"This is a complex process, which needs to be undertaken in a consistent and transparent manner using available and proportionate evidence, involving professional judgements; it was not simply a desk-based study, but one which involved many site visits by CEC's officers or consultants to confirm the assessments and judgements."*
- With regard to the assessment of Purpose 4 the Inspector commented that *"the assessment utilises a variety of historical evidence, which enables a full assessment of the smaller settlements; this could be criticised as being too detailed for a Green Belt assessment which focuses on the larger historic towns, but is not necessarily inappropriate or irrelevant"*.
- With regard to the assessment of Purpose 5 which focussed on the area of brownfield land within the settlement nearest to the Green Belt land under assessment, the Inspector found the approach to be *"consistent, transparent and proportionate."*
- The Inspector's interim findings (H Stephens) to Durham City Council (November 2014) clarified that assessments against the Green Belt purposes should form the basis of any justification for releasing land from the Green Belt, and in reviewing land against the purposes Green Belt studies should consider the reasons for a Green Belt's designation.
- The Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015) emphasised that Green Belt studies should make clear *"how the assessment of 'importance to Green Belt' has been derived"* from assessments against the individual purposes of the Green Belt and highlighted the importance of revisions to Green Belt boundaries to *"take account of the need to promote sustainable patterns of development, as required by Paragraph 85 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process."*
- The Inspector's Letter (M Middleton) to Welwyn Hatfield Borough Council (December 2017) highlighted that the Council has supplied insufficient justification to not allocate sufficient housing development proposals in the Local Plan. The Council's primary source of justification was the Council's Green Belt review. The Inspector found the Phase 1 of the review was too strategic to draw out finer grained variations in Green Belt performance and Phase 2 of the review, although more detailed, failed to assess all potential development sites and did not examine all potentially suitable areas and did not assess the extent to which the Green Belt would be harmed by the loss of a parcel in part, in its entirety or in combination with other parcels. The Inspector noted the Green Belt review had incorrectly incorporated an examination of landscape character into the consideration of openness, and that openness *"should only be concerned about the absence of built development and other dominant urban influences"*. In addition, the Inspector noted that if the quantum of development required can't be met adjacent to urban areas, the Council should assess other locations that are large enough to accommodate a new settlement.
- The Inspector's report (D Smith) to the London Borough of Redbridge (January 2018) supported the Council's decision not to assess the Borough's Green Belt against Purpose 4 on the grounds that there are no historic towns in the Borough. The Inspector also noted that contribution to Purpose 5 had not been assessed because all brownfield sites with reasonable prospects of development had been identified. The Inspector concluded that this reasoning was *"flawed as a matter of principle because the aims of the Green Belt are long-term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites"*.

Planning Appeal Decisions

2.33 Since the adoption of the National Planning Policy Framework in March 2012, there have been several important Planning Appeal decisions that have informed general interpretation of national Green Belt policy and by association MOL policy¹⁴. These include:

- *Heath & Hampstead Society v Camden LBC & Vlachos (2008)* concerned a proposal to demolish an existing residential building on Metropolitan Open Land and replace it with a new, larger building which represented a spatial intrusion upon the openness of the MOL but which did not intrude visually on that openness. The Inspector concluded that *“while it may not be possible to demonstrate harm by reason of visual intrusion as a result of an individual – possibly very modest – proposal, the cumulative effect of a number of such proposals, each very modest in itself, could be very damaging to the essential quality of openness of the Green Belt and Metropolitan Open Land”*. Although the case related to previous policy in relation to the Green Belt as set out in Planning Policy Guidance 2 (PPG 2), this portion of the judgement was cited in *Turner v Secretary of State for Communities and Local Government & East Dorset District Council* (see below) as relevant guidance in relation to the concept of openness of the Green Belt in the NPPF.
- *Calverton Parish Council v Greater Nottingham Councils & others (2015)* indicates that planning judgments setting out the ‘exceptional circumstances’ for the amendment of Green Belt boundaries require consideration of the ‘nature and extent of harm’ to the Green Belt and ‘the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent’:
“the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters: (i) the acuteness/intensity of the objectively assessed need (matters of degree may be important); (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development; (iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt; (iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and (v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.”
- *Timmins and Lymn Family Funeral Service v Gedling Borough Council and Westerleigh Group Limited (2015)* clarifies that any material change of use of land in the Green Belt generally (and the use of land as a cemetery in particular) should be regarded as inappropriate unless listed in Paragraphs 89 and 90 of the NPPF.
- *Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)* was an appeal heard in the High Court relating to a previous appeal judgement in which a refusal for planning permission in the Green Belt by East Dorset District Council was upheld. The High Court appeal was dismissed, but the judgement concluded that:
 - *“openness is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs...and factors relevant to the visual impact on the aspect of openness which the Green Belt presents”*
 - *“The question of visual impact is implicitly part of the concept of ‘openness of the Green Belt’ as a matter of the natural meaning of the language used in para. 89 of the NPPF... There is an important visual dimension to checking ‘the unrestricted sprawl of large built-up areas’ and the merging of neighbouring towns...openness of aspect is a characteristic quality of the countryside, and ‘safeguarding the countryside from encroachment’ includes preservation of that quality of openness. The preservation of*

¹⁴ Case notes referring to the NPPF that pre-date July 2018 make reference to the original March 2012 NPPF document.

'the setting ... of historic towns' obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields."

- *"The openness of the Green Belt has a spatial aspect as well as a visual aspect, and the absence of visual intrusion does not in itself mean that there is no impact on the openness of the Green Belt as a result of the location of a new or materially larger building there."*
- Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016) found that glasshouse development in the Green Belt is appropriate since it is a 'building for agriculture' under the first bullet of Paragraph 89 of the NPPF and therefore not capable of generating harm to the Green Belt designation.
- Samuel Smith Old Brewery (Tadcaster) and Oxton Farm v North Yorkshire County Council and Darrington Quarries Ltd (2018) involved a challenge to a planning permission for a 6 hectare quarry extension in the Green Belt. Although Paragraph 90 of the NPPF states that mineral extraction is not inappropriate development in the Green Belt, the Council failed to take into account visual impacts when considering whether the proposal would *"preserve the openness of the Green Belt"* as required in Paragraph 90 of the NPPF. Lord Justice Lindblom found that the council had limited its consideration of the effects of the proposed development on the openness of the Green Belt to spatial impact and nothing more, despite the fact that, on the council's own assessment of the likely effects of the development on the landscape, visual impact on openness was *"quite obviously"* relevant to its effect on the openness of the Green Belt. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be *"urban sprawl"* and cannot have an *"urbanising influence"*.

Local Planning Policy

Three Rivers District Local Plan

- 2.34 The Three Rivers District Development Plan is formed of a number of documents which include:
- Development Management Policies Local Development Document (2013);
 - Site Allocations Local Development Document (2014);
 - Core Strategy (2011); and
 - Supplementary Planning Documents.
- 2.35 The Development Management Policies Document adopted in 2013, states, in policy DM2 that *"the construction of new buildings in the Green Belt is inappropriate with certain exceptions"*. These exceptions include: extensions (other than those disproportionate in size); replacement dwellings (as long as they meet a number of criteria in the policy); ancillary buildings (that meet the criteria set out in the policy); and re-use and conversion (that meet the criteria in the policy). Approval for new buildings (other than those specified in national policy and guidance) will not be given except in very special circumstances.
- 2.36 The Core Strategy, adopted in 2011 sets out how the District will plan for and deal with future development in Three Rivers for 15 years. Policy CP11 relates to the Green Belt and states:
- "The Council will:
- a) Maintain the general extent of the Metropolitan Green Belt in the District.
 - b) Where appropriate, make minor revisions through the Site Allocations Development Plan Document to the detailed Green Belt boundaries around the main urban area, to accommodate development needs, as detailed in the Spatial Strategy and Place Shaping Policies.
 - c) Retain 'Major Developed Site in the Green Belt' status for Maple Lodge Sewage Treatment Works.

- d) Review 'Major Developed Site in the Green Belt' status in relation to Leavesden Aerodrome, having regard to the important contribution the site is expected to make to meeting the needs for housing and employment.
- e) Encourage appropriate positive use of the Green Belt and measures to improved environmental quality.

There will be a general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within it."

2.37 The Council are currently preparing their new Local Plan which will provide the planning policies and proposals for future sustainable growth in the District up until 2036. Publication of the draft plan is anticipated for Autumn 2019, with adoption scheduled for late 2020. This Green Belt Study forms part of the evidence base for the Local Plan.

Watford Borough Local Plan

2.38 The current Watford Borough Local Plan consists of a number of documents that together guide the strategic approach to growth in the Borough and how planning decisions will be made. These document include:

- The Core Strategy 2006 – 2031;
- Watford District Plan 2000 saved policies; and
- Supplementary Planning Documents.

2.39 The Watford Core Strategy was adopted in 2013 and sets out the approach to growth in the Borough up to 2031. Policy GI 2 in relation to the Green Belt states:

"The Council will:

1. *Maintain the general extent of the metropolitan Green Belt in the borough.*
2. *Encourage appropriate positive use of the Green Belt and measures to improve the environmental quality.*
3. *Make minor revisions to correct existing anomalies and create defensible Green Belt boundaries on the site allocations document and accompanying proposals map.*

There will be a general presumption against inappropriate development in the Green Belt. Exceptions to this are defined in Paragraphs 89-91 of the NPPF."

2.40 It is noted that the saved policies of the Watford District Plan do not include those regarding the Green Belt.

2.41 Watford Borough Council are currently preparing their new Local Plan and are aiming to publish their Preferred Options in late 2019 and the draft Local Plan in Spring 2020. This Green Belt Study forms part of the evidence base for the Local Plan.

Neighbouring Green Belt Studies

2.42 A number of Green Belt studies have been completed in neighbouring local authority areas and summary of these is provided in **Table 2.1** below:

Table 2.1: Summary of Green Belt Studies in Neighbouring Authorities.

Authority	Summary of Green Belt Studies
Joint Green Belt Studies	
Green Belt Review: Purposes Assessment (2013), for Dacorum Borough Council, St Albans City and	A Green Belt Review: Purposes Assessment (Part 1) was undertaken by SKM for multiple authorities including: Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council in 2013. The purpose of the assessment was to provide advice on the role that each sub-area plays in fulfilling the fundamental aim of the Green Belt and the five purposes set out in the NPPF. The assessment comprised of five tasks: 1)

Authority	Summary of Green Belt Studies
District Council, and Welwyn Hatfield Council	a review of national and local policy 2) the identification of parcels 3) a desktop review and on-site inspection of Green Belt against NPPF purposes 4) a review of potential compensatory Green Belt, and 5) a review of the next steps. Task 3 regarded 'historic towns' as settlements or places with historic features identified in local policy or through conservation area or other historic designation(s). In addition, the review considered whether any further 'major developed sites' should be identified in Dacorum Borough only. Overall, the findings demonstrated that most Green Belt land within the study area exhibits high levels of openness and a clear distinction is evident between built-up land and the adjacent surrounding countryside.
Buckinghamshire Green Belt Assessment (2016) for: Aylesbury Vale District; Chiltern District, South Bucks District and Wycombe District.	A Stage 1 Green Belt Assessment was undertaken for the Buckinghamshire Authorities to form part of a shared evidence base for the respective local plan in each of the four local Buckinghamshire Districts and the Buckinghamshire Replacement Minerals and Waste Local Plan. The purpose of the Green Belt report was to assess the strategic land parcels, 'General Areas', against the purposes of the Green Belt as defined in the NPPF. Within this assessment, Purpose 4 towns were compiled using the Buckinghamshire Authorities' Historic Towns Project and were supplemented as and when required by Conservation Area Assessments and Townscape Character Studies. Purpose 5 was omitted from the assessment on the grounds that there were no planned regeneration schemes being inhibited by Green Belt designations within the County. The assessment considered 157 Green Belt General Areas and 14 non-Green Belt General Areas. Of these, a small number were found to perform weakly as Green Belt and were therefore recommended for a more detailed assessment by the Buckinghamshire Authorities.
Individual Authority Green Belt Studies	
Green Belt Assessment, Stage 1 (2017) for Hertsmere Borough Council	<p>The Stage 1 Green Belt Assessment was undertaken as part of the evidence base to inform the early Local Plan review. The assessment assesses the Hertsmere Green Belt against the five NPPF Green Belt purposes. The main aims of the Study were to: 1) analyse the existing Green Belt in the Study area and identify individual strategic areas for further analysis, b) review the role of each of the strategic areas against the aims and objectives of the NPPF and any local purposes that might be identified, c) score the strategic areas based on their contribution to these purposes, d) provide advice on existing and future policies applying to Green Belt in the study area, e) identify smaller land parcels within the strategic areas for potential Stage 2 assessment. With regard to NPPF Purpose 5, on the grounds that a distinction between the contribution that individual parcels would make to this purpose, and there being no planned regeneration schemes that were being inhibited by Green Belt designations this purpose was excluded from the assessment. The geographical areas of Bushey High Street Conservation Area and Radlett (South) Conservation Area were the only areas identified as being of relevance in relation to Purpose 4 of the assessment.</p> <p>Overall, the assessment found that the majority of the Green Belt in Hertsmere is performing an important role in terms of the NPPF purposes; however a small number of areas were identified for further consideration.</p>
Green Belt Assessment (Stage 2) (2019) for Hertsmere Borough Council	The Stage 2 Assessment was designed to advance the Stage 1 Green Belt Assessment and will form part of the evidence base to support the review of the current Hertsmere Local Plan (2012-2027). The focus of the Stage 2 Assessment was to assess the parts of the Green Belt, which might contribute to 'five potential development approaches' identified in the Local Plan Issues and Options public consultation document if exceptional circumstances can be demonstrated. These identified approaches were: a) redevelopment of urban brownfield sites, b) growth through new garden suburbs, c) supporting larger rural communities and growth of key villages, d) meeting the needs of other villages, and e) creating a new garden village. The areas for Green Belt Assessment were defined using the Council's emerging Housing and Economic Land Availability Assessment (HELAA) together with further areas around potential growth settlements to supplement those

Authority	Summary of Green Belt Studies
	<p>recorded in the HELAA.</p> <p>Overall, 72 sub-areas and 9 sub-areas within two promoted Garden Villages were identified for assessment. The study found that almost 38% of the sub-areas assessed continue to perform against one or more of the NPPF purposes strongly and nearly 49% of sub areas are considered to make an important contribution to the wider strategic Green Belt. 26 sub areas were considered to make a less important contribution to the wider Strategic Green Belt.</p>
<p>Green Belt Review Sites & Boundaries Study, for St Albans City and District (2014)</p>	<p>The Stage 2 Assessment provides a more detailed analysis of each of the eight strategic sub-areas in the study area defined in the Part 1 Study (2013), by: a) identifying potential sites within the strategic sub-areas for potential release for future development, b) estimating the potential development capacity of each site; and c) ranking the sites in terms of their suitability for Green Belt release. The methodological approach was sub-divided into a number of tasks which include: a review of contribution towards Green Belt Purposes and review of relevant planning history; assessment of environmental and historic constraints, integration and landscape appraisal/sensitivity; a boundary review and contribution to Green Belt purposes; assessment of developable areas; indicative development capacity and the evaluation of site suitability for potential Green Belt release and future development.</p> <p>The study identified 9 sites which were considered to be most suitable for potential Green Belt release and future development.</p>
<p>Stage 2 Green Belt Review (2014) and Addendum (2016) for Welwyn Hatfield Borough Council</p>	<p>The Stage 2 assessment followed on from the joint local authority 'Purposes Assessment' undertaken in 2013 (see above). The Study assessed 67 Green Belt sites identified by the Borough's 2016 Strategic Housing Land Availability Assessment (SHLAA), the GTLAA call for sites, and areas of Green Belt recommended for further assessment during the Stage 1 study. The Study explains the extent to which each site contributes to NPPF Purposes 1, 2, 3 and 4 and a local purpose: to maintain the existing settlement pattern.</p> <p>In accordance with Part 1 of the assessment, the Purpose 2 towns relate to 1st tier settlements towns, as defined in Welwyn Hatfield's settlement hierarchy. Purpose 4 'historic towns' are defined as 'settlements or places with historic features identified in local policy or through conservation area or other local designation(s)'. The assessment therefore considers conservation areas, historic parks and gardens and Scheduled Ancient Monuments under Purpose 4. Purpose 5 was omitted from the Study on the grounds that there were was a limited supply of available or unallocated brownfield sites in the districts, therefore the Green Belt as a whole had fulfilled this purpose.</p> <p>The findings of the Part 2 Review found that the Green Belt continues to play an important role against the four national purposes and local purpose. The 2016 Addendum assessed an additional 10 sites identified through the 2016 Housing and Employment Land Availability Assessment.</p>
<p>Welwyn Hatfield Green Belt Study Stage 3 (2018)</p>	<p>LUC was appointed to undertake the Stage 3 assessment in response to concerns about the previous Stage 2 Study raised by the Inspector during the Borough's Local Plan Examination. The aims of the assessment were to: a) undertake a rigorous assessment of the Green Belt to establish which areas are 'most essential' to retain; and which areas, if developed, could have less harm on the Green Belt, b) to review existing 'washed over' settlements and consider the extent to which they contribute to the openness of the Green Belt, and c), to assess the contribution to the Green Belt purposes of all land within the Borough. The methodology considered all areas to make an even level of contribution to Purpose 5. The study did not consider Conservation Areas, Historic Parks and Gardens and Scheduled Ancient Monuments from the Purpose 4 assessment, by instead stating that only the historic town of Welwyn Garden City is relevant to Purpose 4. The study also made it clear that the Local Purpose does not contribute to the assessment of Green Belt harm.</p> <p>The study concluded that there were no areas of Green Belt that made a significant</p>

Authority	Summary of Green Belt Studies
	contribution to purposes 1 and 4 and purpose 5 was not assessed. Three key areas made a significant contribution to purpose 2, between Welwyn Garden City and St Albans and Hatfield and St Albans. Virtually all of the wider Green Belt was assessed as making a strong contribution to purpose 3.
Stage 2 Green Belt Review and Landscape Appraisal (2016) for Dacorum Borough Council	<p>The Stage 2 assessment provided a comprehensive Green Belt review and landscape appraisal of the Green Belt within Dacorum Borough Council. This review built on the findings of the Stage 1 Purposes Assessment. Following on from discussions with Dacorum Council, the review considered the Large Villages of Bovington, Kings Langley and Markyate within the Purpose 2 assessment. Furthermore, Stage 2 omitted Purposes 4 and 5 from the review on the grounds that there are no instances where historic towns/cores abut the Green Belt and that the amount of land within urban areas that could be developed is factored in before Green Belt land is identified.</p> <p>All of the sub areas examined were judged to meet one or more of the NPPF purposes, through the degree to which different parts of the Green Belt contribute to the individual purposes varies significantly.</p>
Stage 2 Green Belt Assessment: Strategic Role of the Metropolitan Green Belt in Chiltern & South Bucks (2018)	<p>The Stage 2 Green Belt Assessment forms part of the evidence base for the joint Local Plan. The Stage 2 report considered the Part 1 findings in greater detail to determine the appropriateness of any adjustments to Green Belt boundaries, whilst also considering other areas emerging through the local plan process. The objectives of the assessments were to: a) assess the Strategic Zones using a methodology consistent with the Stage 1 Assessment; b) consider how these SZs form part of a wider network; c) consider each SZ's sensitivity to change and d) consider what strategic role the Green Belt in the study area should have over the period to 2036, within the context of the NPPF. The Assessment found that it would be possible to identify a potential revised boundary that would meet NPPF requirements for 79 of the 200 overall areas. Of these 79 areas, 39 were judged to be performing no Green Belt purpose or performed weakly against one or more Green Belt purpose. The remaining 40 areas scored more strongly against one or more Green Belt purpose. Overall, it is not considered that exceptional circumstances apply to 12 of the areas included within the study.</p>
Green Belt & Major Developed Sites in the Green Belt Assessment (2006), London Borough of Hillingdon	<p>This Study was carried out prior to the 2012 NPPF, and did not review all designated Green Belt land. The assessment: a) reviewed sites examined in the previous UDP review; b) reviewed sites identified in the 2005 Metropolitan Open Land and Green Chains Assessment 2005; and c) reviewed sites identified by officers that could not benefit from Green Belt designation, as well as sites within the Green Belt that do not meet the purposes of the Green Belt.</p> <p>Two sites were recommended to be upgraded to Major Developed Site in the Green Belt, all other sites were recommended to remain in the Green Belt.</p>
Harrow London Borough Council	<p>The London Borough of Harrow does not have any existing Green Belt studies. However, a Green Belt Management Strategy was prepared for the period 2006 – 2011 which provided a framework to guide the Borough's future decisions on the protection and management of the Green Belt.</p>

2.43 Consideration of the approaches taken within these studies was taken into account in developing the methodology for this Stage 2 study.

South West Herts Joint Strategic Plan

2.44 Three Rivers District Council, Dacorum Borough Council, Hertsmere Borough Council, Watford Borough Council and St Albans City & District Council, have begun work on a Joint Strategic Plan for the South West Hertfordshire Area. The plan will set the strategic framework and shared priorities of the councils, within which individual Local Plans can be prepared. The Joint Spatial Plan is in the early stages of preparation and details regarding the scope of the plan have yet to

be published, so it has no bearing on this Green Belt study. Green Belt will however be a consideration in the development of the Joint Strategic Plan.

3 Methodology

Introduction

- 3.1 This chapter sets out the methodology for the Stage 2 Green Belt assessment, which identifies the harm to the Green Belt that would result from the release of land adjacent to the existing urban areas within the two authorities. The following section firstly summarises the Stage 1 assessment scope and approach and then outlines the methodology for the Stage 2 assessment, which draws on the main findings of the Stage 1 Green Belt Study.

Stage 1: Scope and approach

- 3.2 The Approach and Methodology section of the Stage 1 Study, undertaken by Amec Foster Wheeler set out its scope as follows:

“This report is a strategic review of the extent to which the Green Belt within Three Rivers District and Watford Borough meets the purposes set by the NPPF, complemented by an exploration of the character and role of villages within the Green Belt, drawing conclusions on the suitability for the continued and potential in-setting of villages within the Green Belt, as required by Paragraph 86 of the NPPF.”

- 3.3 It went on to clarify that it was not a consideration of specific development proposals, and that whilst it made reference to potential for positive use of Green Belt land, it was only an initial assessment in this respect, and that further technical evidence may need to be gathered.

Contribution assessment

- 3.4 Using a subdivision of the District into a series of land parcels (based on distinct physical features, principally major roads) to organise the assessment, the Stage 1 Study drew out strategic variations in the contribution of Green Belt land to the Green Belt purposes as defined in the NPPF.
- 3.5 Each parcel was rated as making a *limited contribution*, a *contribution* or a *significant contribution* to each Green Belt purpose, and these findings were combined into an overall contribution rating which reflected professional judgement rather than the application of any specific formula or weighting. Five elements were identified as assessment considerations:
- Existing land use;
 - proximity and relationship to the built-up area;
 - degree of enclosure/openness;
 - distance and visual connection to historic urban centres/key urban areas; and
 - relationship to the countryside.
- 3.6 The Stage 1 Study also assessed the ‘local role’ of the Green Belt in *“preserving the setting and character of villages and other settlements”* by considering the relationship between smaller settlements and surrounding Green Belt, but this did not feed into the overall ratings for contribution, which was limited to consideration of the five ‘national’ Green Belt purposes.

Review of villages

- 3.7 The Stage 1 study carried out a review of washed-over Green Belt villages to establish whether, with reference to Paragraph 140 of the NPPF, any were sufficiently developed to potentially warrant exclusion from the Green Belt – i.e. insetting.

- 3.8 Three settlements were considered large enough for inclusion in the assessment – Heronsgate, Sarratt and Bedmond – with smaller hamlets and isolated development excluded. Heronsgate and Sarratt were judged to have sufficient openness to make a positive contribution to Green Belt purposes, but in the case of Bedmond it was concluded that:

“... the compact form, density and variable relationship with the Green Belt of Bedmond prompts a case for exploring a village envelope and inseting, should a case for additional development in and around the village be identified.”

Stage 2: Scope and overall approach

- 3.9 The Stage 2 study involved an assessment of the potential harm to the Green Belt associated with the release of specific areas of land. The harm assessment considers the extent to which the release of different areas of land would reduce contribution to Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the strength of the adjacent Green Belt. Ratings and supporting analysis are provided in relation to each assessed Green Belt purpose, and considered in combination to arrive at a single overall harm rating.
- 3.10 The impact on Green Belt purposes of the release of land is not inherently related to the size of the area released, in that the contribution of land depends on its relationship with settlements (large built-up areas, neighbouring or historic towns) and countryside. However the release of a larger area clearly has more potential to weaken the Green Belt by extending into areas that have a greater distinction from urban edges, by diminishing settlement separation and by diminishing the extent to which remaining open land relates to the wider countryside. The analysis of harm as a progression of land release out from an inset settlement edge allows variations in this impact to be judged; something which cannot so readily be achieved when considering the overall contribution made by a predefined parcel of land.
- 3.11 There is an assumption in the assessment of harm that release of land would constitute loss of openness. It is recognised that specific development proposals may include the retention of undeveloped areas, and/or the implementation of landscaping measures – e.g. to create a stronger boundary – that could potentially reduce harm to Green Belt purposes. The study cannot take into account specific development proposals, which may be at varying degrees of development and certainty, but any factors which could potentially reduce harm in relation to an identified parcel were noted.
- 3.12 The desk-based assessment was supported by site visits to all the areas being assessed. This was important to ensure that the assessment was robust.

Local Purpose

- 3.13 The Stage 1 Study also assessed the ‘local role’ of the Green Belt in *“preserving the setting and character of villages and other settlements”*. In discussion with the Councils it was agreed that there was no requirement to assess this local role in further detail at Stage 2 as no weight can be attributed to this and it may cause confusion. The Inspector in the Welwyn Hatfield Local Plan Examination noted that ‘maintaining the settlement pattern is a local consideration’ and not one of the five Green Belt purposes.

Beneficial Use

- 3.14 The Stage 1 Study also briefly addressed opportunities for promoting positive use of the Green Belt. Again after discussions with the Councils it was decided that this is better addressed through separate studies and plans, such as Green Infrastructure and Open Space Studies and therefore this was not assessed as part of this Stage 2 Study.

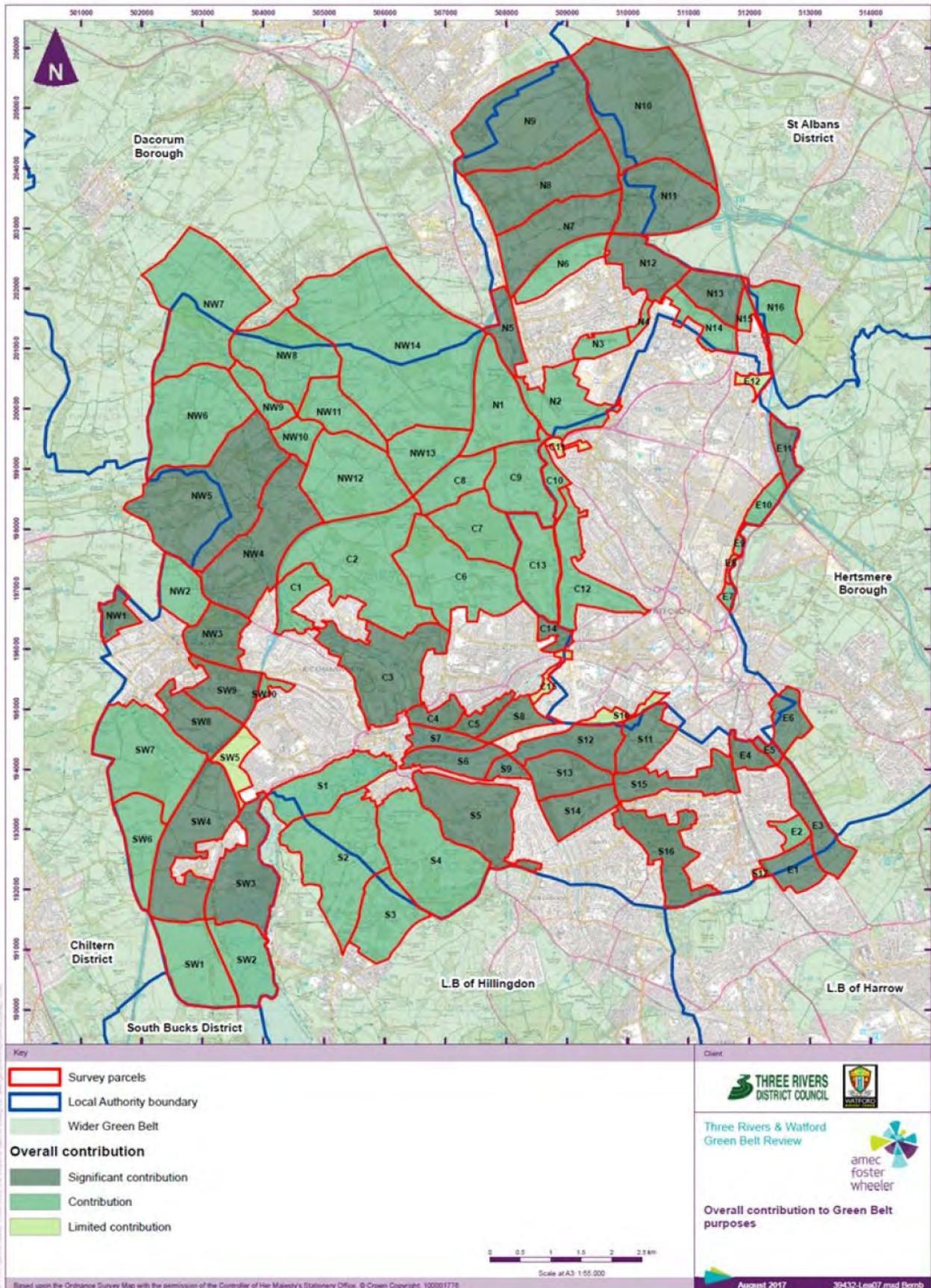
Stage 2: Extent and subdivision of assessment area

General extent

- 3.15 Having discounted, with the potential exception of Bedmond, the creation of any distinct new inset development areas, the Councils identified the need to assess all of the land adjacent to the urban edges of inset settlements within and bordering Three Rivers and Watford in order to assess the impact that settlement expansion could have on the purposes of the Green Belt. The inset settlements include:
- Watford (including Watford North, Watford South, Watford East and Watford West);
 - Rickmansworth (including Mill End);
 - Loudwater;
 - Abbots Langley;
 - Chorleywood;
 - Maple Cross;
 - Croxley Green;
 - Kings Langley;
 - South Oxhey / Carpenders Park;
 - Northwood (including Eastbury and Moor Park);
 - Batchworth; and
 - Hemel Hempstead.
- 3.16 As outlined in Chapter 2, a South West Hertfordshire Joint Strategic Plan is also being prepared and this will explore the potential for any new settlement locations. No assessment has therefore been undertaken in this study of land not adjacent to the urban areas.
- 3.17 The intention of the Stage 2 study was to extend the analysis outwards from inset edges as far as was necessary to capture the variations in contribution to the Green Belt purposes. The extent of the assessment area was therefore determined incrementally through the analysis process, starting with all Green Belt land within Three Rivers and Watford adjacent to inset settlements or to Bedmond, extending out to boundary features beyond which release of land was considered to result in an increase in harm level. Where this increased harm level was rated less than *high*, land extending out to the next significant boundary feature was assessed as a separate land parcel, but where a boundary was judged to mark a change to *high* or *very high* harm this rating would apply to all land beyond that boundary, so no further parcel subdivision was required.
- 3.18 Reference was also made to the location and extent of promoted development sites in the vicinity of each settlement. The Stage 2 study is not specifically an assessment of proposed developments, but it is recognised that where sites are present that, if released, would constitute expansion of an urban area, it made sense to incorporate the whole site within the study area.
- 3.19 **Figure 3.1** is taken from the Stage 1 report prepared by Amec Foster Wheeler and shows the results of the Stage 1 strategic review of the Green Belt purposes. This is a map of the overall contribution to the five Green Belt purposes. As can be seen six areas were considered to have a limited contribution to all of the Green Belt purposes. These are all located on the edge of inset settlements (Watford, South Oxhey, Mill End and Croxley Green) and have been included in the Stage 2 assessment of harm.
- 3.20 Land in neighbouring districts and boroughs was considered in the assessment where it was necessary to determine, as part of the harm assessment process, the potential impact that could result from release of adjacent land within Three Rivers or Watford. In two instances, immediately south of Hemel Hempstead and at the south western corner of Bricket Wood, it was necessary to consider harm resulting from release of Green Belt land in a neighbouring authority area (Dacorum and St Albans Respectively) in order to assess harm for parcels of land in Three Rivers, as these areas would need to be released in order for land in Three Rivers to be developed as part of an expansion of Hemel Hempstead or Bricket Wood. Land in Dacorum and St Albans

was not assessed as separate parcels but is referenced in the analysis for the relevant parcels defined within Three Rivers: HH1, HH2 and WN10.

Figure 3.1: Map from Stage 1 report showing overall contribution to Green Belt purposes



- 3.21 The limited gaps between inset areas means that, other than where inset urban areas span the local authority boundaries, the assessment areas around each settlement merge. Structuring the analysis around expansion of urban edges facilitated consideration of such gaps between settlements in terms of expansion of either settlement, to identify whether differences in the relationship between settlement and countryside mean that the harm associated with expansion of one might be different to that associated with expansion of the other.

Subdivision

- 3.22 Within the assessment area around each settlement, land was in the first instance subdivided into parcels by boundaries used to define the Stage 1 parcels. In some cases this resulted in whole Stage 1 parcels being assessed within parcels at Stage 2, but in other cases only partial Stage 1 parcels were included.
- 3.23 The analysis of land within each Stage 1 parcel identified any variations in three factors that are considered to contribute to the strength of Green Belt land:
- its *openness* - i.e. absence of urbanising development;
 - the extent to which it is *contained* by urbanising influences - e.g. other development;
 - the degree of *distinction* between the Green Belt and the inset urban edge – i.e. considering the extent of any physical distinction, whether associated with the boundary between the two or the landform and/or land use within the open area.
- 3.24 Within the Stage 1 parcels or part-parcels, land was divided as necessary into Stage 2 parcels to reflect assessed variations in harm to Green Belt purposes.

Exclusions

- 3.25 All of the parcels identified for consideration at Stage 2 were overlaid with a set of 'absolute' environmental constraints – i.e. areas within which the Council would not permit development. These include the following:
- Scheduled Monuments;
 - Registered Parks and Gardens;
 - Sites of Special Scientific Interest;
 - Local Nature Reserves;
 - Ancient Woodland;
 - Common land; and
 - Flood Zone 3b.
- 3.26 It was agreed after discussions with the Councils, that Local Wildlife Sites should not be treated as an absolute constraint.
- 3.27 The Stage 2 harm assessment did not rate these areas on the basis that, whether or not defined as Green Belt, they would not be developed. Excluding such designations from detailed assessment at Stage 2 is consistent with recent Inspectors' comments. For example the Inspector in the Welwyn Hatfield Local Plan Examination advocated the exclusion of selected designations from detailed assessment. This approach has also been endorsed by the Planning Officers Society.
- 3.28 It is important to note that although these constrained areas were not assessed for harm, any function they may perform as areas of open land and/or as boundary features – which may well have a bearing on the assessment of harm that would be caused from the release of adjacent unconstrained Green Belt land – were taken into consideration.

Stage 2: Assessment Process

- 3.29 The Stage 2 assessment followed the following three key steps:

- Step 1: Considered the impact on the contribution to the NPPF purposes.
- Step 2: Assessed the potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
- Step 3: Assessed the overall Green Belt harm and any variations of harm within the 'assessment zone'.

3.30 These are explained in more detail below:

Stage 2 Step 1: Impact of release on contribution to each NPPF Green Belt purpose

- 3.31 The strength of the Green Belt land that would be lost if released needs to be considered alongside the relationships between settlement and countryside relevant to each purpose, to determine the extent of impact – i.e. the relationship the parcel in question has with large built-up areas (Purpose 1), neighbouring towns (Purpose 2) and countryside (Purpose 3).
- 3.32 Within each identified parcel at Stage 2, a rating was given for impact on contribution to each of these three purposes, on a five-point scale of *significant* / *relatively-significant* / *moderate* / *relatively limited* / *limited* or *no impact*.
- 3.33 A summary of how the Stage 2 Study considered the issue of openness and permanence and the impact on the contribution to each of the NPPF purposes is set out below.

Openness and permanence

- 3.34 As noted in **Chapter 2**, the NPPF identifies openness as an 'essential characteristic' of the Green Belt, rather than a function or purpose. Openness is therefore seen as a key element in the assessment of all Green Belt purposes. Land that lacks openness will play less of a role in preventing sprawl, separating towns, preventing countryside encroachment, providing a setting to a historic town or assisting in urban regeneration.
- 3.35 Two important Planning Appeal judgements (Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)) define openness as having both a spatial aspect and a visual aspect.
- 3.36 **Spatial openness** as a characteristic can be considered in terms of the scale and density of built development. The location, extent and form of new development in the Green Belt can, in isolation or in combination, compromise/harm the openness of the Green Belt¹⁵. Similarly, the location, extent and form of existing development affects the degree to which Green Belt land can be considered to be open rather than an extension of a built-up area in its own right. However, not all built development is considered to affect openness. The NPPF lists in Paragraph 145a number of types of buildings that are 'not inappropriate' within the Green Belt. As a matter of law, development such as agriculture and forestry which is appropriate in the Green Belt and is not required to 'preserve the openness' of the Green Belt cannot be considered to impinge on its openness¹⁶.
- 3.37 **Visual openness** is important in so far as it relates to the purposes of the Green Belt. In certain places there is an important visual dimension to checking 'the unrestricted sprawl of large built-up areas' (Purpose 1), and preventing 'neighbouring towns merging into one another' (Purpose 2); openness of aspect is a characteristic quality of the countryside, therefore 'safeguarding the countryside from encroachment' (Purpose 3) includes preservation of openness; and preservation of 'the setting...of historic towns' (Purpose 4) includes visual setting¹⁷. For example, a range of natural and man-made features – topography, vegetation, buildings and linear features such as roads and railways – can contribute to or compromise the visual openness of the Green Belt. A

¹⁵ This point is made in the judgement in Heath & Hampstead Society v London Borough of Camden (2008), see Appendix 1.

¹⁶ Lee Valley Regional Park Authority v Epping Forest DC and Valley Grown Nurseries Ltd (2016), see Appendix 1.

¹⁷ This point is made in the judgement in Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016).

key distinction however is that while vegetation or landform can provide visual enclosure to development that lessens its visual impact, this does not diminish the *spatial openness* of the Green Belt.

- 3.38 As noted by the Inspector to the Welwyn Hatfield Borough Council Local Plan Examination (2017) (see **Chapter 2**) openness is not concerned about the character of the landscape, but instead relates to the '**absence of built development and other dominant urban influences**'.
- 3.39 With regard to the other 'essential characteristic' of permanence, Green Belt is a permanent planning designation. Therefore, it is recognised that there are benefits in retaining or establishing Green Belt boundaries which are clearly defined, readily recognisable and likely to be permanent.

Purpose 1: To check the unrestricted sprawl of large built-up areas

- 3.40 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the Study requires the definition of variations in the extent to which land performs this purpose. This requires an area-based assessment against this strategic purpose.
- 3.41 The PAS guidance states in relation to Purpose 1:
- "The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"
- 3.42 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:
- "As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development."
- 3.43 Whilst definitions of sprawl vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the contribution land makes to preventing sprawl in a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role a land area plays will be dependent on its relationship with a large built-up area.
- 3.44 The definition of 'large built-up area' clearly will also have a bearing on contribution of land to Purpose 1. There is no standard definition for this, and no definition provided in the NPPF. Green Belt studies in different locations have ranged from considering the large built-up area as just the principal settlement around which the Green Belt was defined (i.e. London in the case of the Metropolitan Green Belt) to considering all inset settlement to be large built-up areas.

Overview of Stage 1 Approach

- 3.45 The Stage 1 study listed Rickmansworth, Chorleywood, Northwood, Croxley Green and Watford within (or part within) the study authorities, and Hemel Hempstead and Bushey beyond it, as large built-up areas relevant to the assessment.
- 3.46 The principal function of the Metropolitan Green Belt is to check the sprawl of the large built up area of Greater London and those settlements listed above, whilst they all retain separate settlement identities and some degree of physical separation by open land, are all also almost contiguous in terms of linkage along principal routes.
- 3.47 The Green Belt in Three Rivers and Watford appears to be effectively managing the pressures for outer London suburbs and towns to expand north and west towards open countryside, which is illustrated by the compact urban form and the transition into open land. As identified in the Stage 1 report the Green Belt land around the northern and western edges of Watford, Croxley Green, Rickmansworth and Chorleywood all make at least a *contribution* to Purpose 1.

Stage 2 Approach

- 3.48 The Stage 2 study remained consistent with the Stage 1 study in terms of its identification of settlements considered to form part of the 'large built up area' - i.e. Rickmansworth, Chorleywood, Northwood, Croxley Green, Watford, Hemel Hempstead and Bushey. There are however some settlements such as Loudwater, South Oxhey etc. that are close enough to more contiguous urban development within the settlements outlined above to constitute part of the large built-up area extending out from Greater London.
- 3.49 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred, the extent of urban containment and its relationship with existing large built-up area(s). Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development or not inappropriate development in the Green Belt (as defined in paras 143-147 of the NPPF¹⁸).
- 3.50 To contribute to Purpose 1, land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development, or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose and therefore development will have a less significant impact on this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it makes a stronger contribution and hence development will have a more significant impact on Purpose 1. Development on land which is more clearly associated with a settlement that is not a large built-up area will not have an impact on the contribution to Purpose 1.
- 3.51 A summary of the approach that was used to assess the potential impact on the contribution to Purpose 1 is set out below:

Purpose 1: Check the unrestricted sprawl of large built-up areas	
Significant impact on contribution	Development would constitute significant sprawl as the land is close to the large built-up area, contains no or very limited urban development, is not itself contained by any urban development, and has strong distinction from the inset settlement edge.
Relatively significant impact on contribution	Development would constitute relatively significant sprawl as the land is close to the large built-up area and contains very limited urban development and has a strong sense of openness. It relates more strongly to the wider countryside.
Moderate impact on contribution	Development would constitute moderate sprawl as the land is close to the large built-up area, contains limited urban sprawl and has a relatively strong sense of openness. It may relate to both the settlement and the wider countryside or have a degree of separation from both.
Relatively limited impact on contribution	Development would have relatively limited impact on the contribution to Purpose 1 as the land is close to the large built-up area and already contains urban sprawl compromising the sense of openness, or it relates more strongly to the urban area than to the wider countryside.

¹⁸ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be "urban sprawl" and cannot have an "urbanising influence".

Limited or No impact on contribution	<p>Development would have limited or no impact on the contribution to Purpose 1 as:</p> <ul style="list-style-type: none"> • the land is close to the large built-up area but is already fully urbanised; • or the land is not close enough for there to be any potential for urban sprawl from the large built up area to occur within the parcel.
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Purpose 2: To prevent neighbouring towns from merging into one another

- 3.52 The concept of what constitutes a ‘town’ has been widely interpreted in different Green Belt studies, ranging from settlements classified as towns in Local Plan settlement hierarchies to all urban areas inset from the Green Belt regardless of size.
- 3.53 Regardless of whether a particular settlement is large enough to realistically be considered a town, it can be acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between larger ‘towns’.
- 3.54 The concept of ‘merging’ is clearer, but assessing the extent which land between towns contributes to preventing this is less so, but it is generally acknowledged that the role land plays in preventing the merging of towns is more than a product of the size of the gap between them. Assessments therefore usually consider both the physical and visual role that Green Belt land plays in preventing the merging of settlements.
- 3.55 This accords with PAS guidance which is commonly referenced in Green Belt studies and states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. The PAS guidance also refers to settlement character and the character of land in between as being relevant considerations when looking at retaining separate identities.

Overview of Stage 1 Approach

- 3.56 The Stage 1 study identified the following as ‘neighbouring towns’:
- Watford and Hemel Hempstead;
 - Watford and St Albans;
 - Watford and Rickmansworth;
 - Rickmansworth and Northwood;
 - Watford and Northwood;
 - Watford and Pinner;
 - Watford and Bushey; and
 - Watford and Radlett.
- 3.57 The majority of land forming gaps between these settlements was found to make a *significant contribution* to Purpose 2, reflecting the limited separation between urban areas on this Metropolitan fringe. The assessment findings also suggest that Chorleywood has been treated as a town, although it was not listed as such in the Stage 1 report, and that narrow gaps associated with smaller settlements, such as Maple Cross and Abbots Langley, were been considered to make a *contribution* to Purpose 2.

Stage 2 Approach

- 3.58 Land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land. Physical proximity is the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, makes a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. However, where settlements are very close, a judgement is also made as to whether their proximity is such that the remaining open land does not play a critical role in maintaining a distinction between the two towns, i.e. the characteristics of the open land relate more to the urban areas themselves than to the open land in between. Where this is the case, the contribution to Purpose 2 may be reduced.
- 3.59 The Stage 2 study remained consistent with the Stage 1 study in terms of its identification of settlements considered relevant to the assessment of gaps between neighbouring towns. The following settlements were therefore considered as ‘neighbouring towns’:
- Watford and Hemel Hempstead;
 - Watford and St Albans;
 - Watford and Rickmansworth;
 - Rickmansworth and Northwood;
 - Watford and Northwood;
 - Watford and Pinner;
 - Watford and Bushey; and
 - Watford and Radlett.
- 3.60 In addition it is recognised that towns which are further apart may nonetheless have limited separation, particularly along connecting roads, due to the presence of smaller intervening inset areas. Thus the Purpose 2 assessment considered the role of Croxley Green and Abbots Langley in limiting separation between Watford and Rickmansworth and Hemel respectively, the role of land around Chorleywood in the gap between Rickmansworth and Amersham (a gap also narrowed by the inset settlement at Little Chalfont) and the role of land around Maple Cross in the gap between Rickmansworth and Chalfont St Peter / Gerrards Cross.
- 3.61 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation.
- 3.62 A summary of the approach that was used to assess the potential impact on the contribution to Purpose 2 is set out below:

Purpose 2: Prevent neighbouring towns from merging	
Significant impact on contribution	Development would have a significant impact on the contribution to Purpose 2 as it would result in physical or visual coalescence of towns, or would leave a negligible physical gap with no physical elements to preserve separation.
Relatively significant impact on contribution	Development would have a relatively significant impact on the contribution to Purpose 2 as it would result in a significant narrowing of the visual or physical gap between towns with no physical elements to preserve separation.

Moderate impact on contribution	<p>Development would have a moderate impact on the contribution to Purpose 2 as:</p> <ul style="list-style-type: none"> • it would result in significant narrowing of the physical gap, but physical feature(s) would preserve a sense of separation; or • it would result in a moderate narrowing of the physical gap, but with no physical feature(s) to preserve separation.
Relatively limited impact on contribution	<p>Development would have a relatively limited impact on the contribution to Purpose 2 as:</p> <ul style="list-style-type: none"> • it would result in a very limited narrowing of the visual or physical gap with no physical feature(s) to preserve separation; or • it would result in a moderate narrowing of the physical gap, but with physical feature(s) to preserve separation.
Limited or No impact on contribution	<p>Development would have limited or no impact on the contribution to Purpose 2 as:</p> <ul style="list-style-type: none"> • the land is not located within a gap between towns; or • the land plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or • the land plays no significant role due to the extent of development; or • the land forms a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.63 The third Green Belt purpose focuses on the role of the Green Belt in safeguarding the countryside from encroachment.
- 3.64 PAS guidance presumes that all Green Belt does this to some degree, but suggests that:
- “The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.”
- 3.65 Determining the extent to which Green Belt land is influenced by the urban area requires some consideration of the use of land and the extent of its containment by development, but caution is needed when considering what land uses diminish Green Belt openness and diminish the extent to which land can be considered to constitute ‘countryside’.
- 3.66 Paragraph 145 and 146 of the NPPF and associated case law provides guidance on what land uses and features are considered to be ‘appropriate’ development in the Green Belt (see **Chapter 2**). Appropriate development within the Green Belt cannot, according to case law¹⁹, be considered to have an urbanising influence and therefore harm Green Belt purposes.
- 3.67 It is also important not to stray from assessment of the Green Belt purposes into assessment of landscape character, sensitivity or value; whilst Green Belt land may be valuable in these respects it is not a requirement or purpose of the designation to provide such qualities.

¹⁹ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404.

Overview Stage 1 Approach

- 3.68 This purpose was assessed at Stage 1 in terms of the role of the parcel in maintaining a sense of openness. The majority of the Green Belt land within Three Rivers and Watford was considered to make a *contribution* to this purpose as it is open and undeveloped.
- 3.69 The Stage 1 Study identified areas which make a *significant contribution* where there was evidence of actual or potential pressure for change. These areas are located between Watford and Hemel Hempstead, between Croxley Green and Rickmansworth, between Rickmansworth and Chorleywood, between Rickmansworth and Northwood, and in the vicinity of Sarratt.

Stage 2 Approach

- 3.70 In keeping with the Stage 1 Study, the Stage 2 harm assessment took into account the impact of existing washed-over development, containing inset development and the potential for boundaries to limit harm to the wider countryside.
- 3.71 However, the Stage 2 study gave consideration to the nature of 'appropriate development' and the extent to which different land uses can be considered urbanising. Development deemed to be 'appropriate' within the Green Belt (as defined in the closed lists within Paragraphs 145 and 146 of the NPPF) cannot be considered to constitute an urban land use, or an urban influence in the countryside. However, what is deemed to be appropriate development in the NPPF has to be carefully considered as developments such as the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments are only considered appropriate as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 3.72 Caution has therefore been exercised in the application of what is defined as an appropriate use. It is not possible within a Strategic Green Belt study to review each form of development within the Green Belt and ascertain whether it was permitted as appropriate development or not, unless it is clear cut for example buildings for agriculture and forestry are deemed to be appropriate development regardless of whether they preserve the openness or conflict with the GB purposes. For other land uses such as outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments, a considered view has been taken on the extent to which the proposed land use has affected the GB purposes, for example by affecting openness, or encroaching on the perception of countryside ie the sense of distinction between the urban area and countryside.
- 3.73 The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising use; the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. its distinction from the urban area or the wider countryside); and its containment.
- 3.74 Physical landscape elements (or a lack of them), may strengthen or weaken the relationship between settlement and adjacent countryside, but there needs to be significant urban influence from adjacent land, and a degree of physical landscape containment to limit contribution to this purpose. Intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence. The urban area would need to be a dominating influence either through:
- i) the scale of development; or
 - ii) the degree of containment of the open land by development.
- 3.75 In addition, the presence of landscape elements (e.g. landform or woodland) that strongly contain an area, and consequently separate it from the wider countryside, may give land a strong relationship with a visible urban area even if buildings are not particularly dominant.
- 3.76 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape/visual character. For example, land that displays a strong landscape character in terms of a sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape/visual point of view. However the same land in Green Belt terms may well make as equal contribution to Purpose 3 as land at the urban edge which retains its openness and a relationship with the wider countryside.

3.77 A summary of the approach that was used to assess the potential impact on the contribution to Purpose 3 is set out below:

Purpose 3: Assist in safeguarding the countryside from encroachment	
Significant impact on contribution	Development would have a significant impact on the contribution to Purpose 3 as the land contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), is not itself contained by any urban development and has strong distinction from the inset settlement edge.
Relatively significant impact on contribution	Development would have a relatively significant impact on the contribution to Purpose 3 as the land contains the characteristics of open countryside. It relates more strongly to the wider countryside than the settlement and has very limited urbanising development.
Moderate impact on contribution	Development would have a moderate impact on the contribution to Purpose 3 as: <ul style="list-style-type: none"> the land contains the characteristics of open countryside and has limited urbanising development. The parcel relates to both the settlement and the wider countryside or has a degree of separation from both; or the land relates more strongly to the wider countryside than to the settlement, but openness is compromised by urbanising development within it.
Relatively limited impact on contribution	Development would have a relatively limited impact on the contribution to Purpose 3 as the land has very limited characteristics of open countryside and has urbanising development that compromises openness. The parcel relates more strongly to the settlement than to the wider countryside.
Limited or No impact on contribution	Development would have limited or no impact on the contribution to Purpose 3 as: <ul style="list-style-type: none"> the land contains urbanising development of a scale, density or form that significantly compromises openness; or the land is too influenced and contained by urban development to retain any relationship with the wider countryside.

Purpose 4: To preserve the setting and special character of historic towns

3.78 The fourth Green Belt purpose focuses on the role of the Green Belt in preserving the setting and special character of historic towns. The purpose makes specific reference to ‘historic towns’ not individual historical assets or smaller settlements such as villages and hamlets, but Green Belt studies have offered a range of interpretations, with a common approach being to consider the relationship with designated Conservation Areas regardless of their location.

3.79 An extract from Hansard in 1988 clarifies which historic settlements in England were considered ‘historic towns’ in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge²⁰. Durham has since been added to this list.

3.80 This is supported by the PAS guidance which states: that *“This purpose is generally accepted as relating to very few settlements in practice.”*

²⁰ Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) Response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3

Overview of Stage 1 Approach

- 3.81 The Stage 1 study stated that *“there are no historic towns within, or adjacent to, the study area”*, but went on to apply analysis in what was termed a ‘local context’ by considering the relationship between Green Belt land and designated Conservation Areas.
- 3.82 By this measure three areas were judged to make a *significant contribution* to Purpose 4: the adjacent golf courses at Moor Park and Rickmansworth, land at Leavesden Country Park, Chorleywood Common and woodland to the south of Watford Heath. Many other parcels of land located adjacent or close to Conservation Areas were considered to make a *contribution* to their settings.

Stage 2 Approach

- 3.83 Clearly there are historic aspects to towns and smaller settlements within the study area, but the important aspect in terms of contribution to this purpose is that there needs to be a significant relationship between Green Belt land and historic aspects of a settlement’s setting, such that some degree of special character results.
- 3.84 Rickmansworth has a historic core with a range of building styles and materials, nationally listed buildings and three Conservation Areas. However, while the historic core remains, this is now surrounded by the railway to the north, ‘A’ roads and suburban housing which limit the historic core’s relationship with the wider Green Belt. Other than the role the Rivers Chess and Colne, and the Grand Union Canal played in regards to the industry of the town, and currently play in the physical constraint of southern expansion, the conservation area appraisals do not mention any important views, or linkages with the surrounding countryside.
- 3.85 Watford contains a number of heritage assets and ten Conservation Areas which reflect the historic development of the town, but suburban housing and industrial uses surround the historic core and limit the town’s relationship with the surrounding Green Belt. The Civic Core Conservation Area lies near Cassiobury Park, which lies within the Green Belt and retains some historic elements, but the relationship between the town centre with the park is now limited by the A412 Rickmansworth Road and newer suburban housing, known as ‘Metroland’ housing which followed the Metropolitan line out from London and led to areas of large houses with large gardens.
- 3.86 Much of the setting for the Grove Mill Lane Conservation Area is provided by the sweeping landscape of the historic Grove Estate²¹ – now a hotel and golf course, within the Green Belt. However, this small Conservation Area lies on the outskirts of the town and it is considered that its relationship with the neighbouring Green Belt does not convey ‘special character’ to Watford as a historic town.
- 3.87 Although the Stage 2 assessment provides a more granular assessment than the Stage 1 study, its focus is still with potential harm to the ‘national’ Green Belt purposes. What is termed the ‘local context’ is considered to be more appropriately the concern of landscape or cultural heritage sensitivity assessments, and Conservation Area designations themselves can identify significant relationships with open land that would inform such sensitivity assessments, or indeed can be defined to encompass open land and thereby aid its protection. Therefore the Stage 2 study did not identify any historic towns which can be considered relevant in to the assessment of this Green Belt purpose.

Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 3.88 Most Green Belt studies do not assess individual Green Belt land parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that one parcel of Green Belt land makes a higher contribution to encouraging re-use of urban land than another. The PAS guidance states:

“...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt

²¹ https://www.watford.gov.uk/downloads/file/1324/grove_mill_conservation_area_character_appraisal_january_2017

achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose."

- 3.89 In other words, it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative contribution of discrete parcels of Green Belt land to Purpose 5.
- 3.90 However, the examination reports of some planning Inspectors, e.g. Cheshire East Council's Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting. It is also important to consider local circumstances in relation to brownfield land, before concluding whether all land should be rated equally against Purpose 5.
- 3.91 Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Assent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development. In addition, the National Planning Policy Framework requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development – a Housing and Economic Land Availability Assessment (HELAA). Together, these evidence bases provide an accurate and up-to-date area of available brownfield land within individual authority areas.

Overview of Stage 1 Approach

- 3.92 The Stage 1 study posed the following question for each assessment area:
- "Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically?"*
- 3.93 It concluded:
- "The potential contribution to urban regeneration of the Green Belt is difficult to determine with any certainty. The general buoyancy of the land market means that there are no extensive areas of brownfield land awaiting regeneration onto which Green Belt designation could focus development activity, meaning that there can only be an assumed locally-focused contribution, and the contribution by parcel is limited (and generalised) across the two authorities."*
- 3.94 For all parcels it therefore gave a *limited contribution* rating; however the study conclusions did suggest potential at the local scale for land to play a role in encouraging regeneration of specific parts of the larger built-up areas.

Stage 2 Approach

- 3.95 The Borough of Watford's latest brownfield register (December 2018)²² contains a record of only 2.15 ha of brownfield land which is suitable and available for housing development within the urbanised area of the Borough and the Council has recorded an average of 94% of development occurring on brownfield land in the last ten years. The District of Three Rivers' latest brownfield register (December 2018)²³ contains a record of 53.4 ha of brownfield land which is suitable and available for housing development within the urbanised areas of the District (although it is noted that the above does not include brownfield land which may be suitable for employment and other uses).
- 3.96 The adopted Three Rivers Core Strategy²⁴ states that there will not be sufficient housing capacity within existing urban areas towards the middle and end of the Plan period, but that there is the potential to meet housing targets from sites both within urban areas and on the edge of urban areas. 75% of the total housing development was envisaged to be in the existing urban area while 25% would need to fall within the Green Belt. It is noted that during the Core Strategy period (2001 – 2026) the housing target was 180 dwellings per year. Once the new Local Plan is adopted this will rise to 620 dwellings per year.

²² https://www.watford.gov.uk/downloads/file/1950/watford_brownfield_land_register

²³ <https://www.threerivers.gov.uk/egcl-page/brownfield-land-register>

²⁴ <https://www.threerivers.gov.uk/egcl-page/core-strategy>

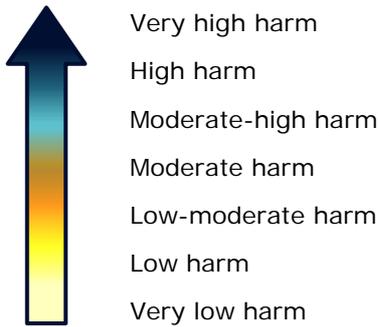
- 3.97 The Watford Core Strategy (2006 - 2031) identified enough capacity to meet their housing targets throughout the plan period. Policy HS1 steers this towards previously developed land. The updated housing targets for Watford require delivery of approximately 790 dwellings per annum compared to 260 identified in the Core Strategy.
- 3.98 When assessing contribution to the first four Green Belt purposes, it is the characteristics of an area of land and its relationship with settlement and countryside that affect its role. For Purpose 5 however, it is the extent to which brownfield land is used to meet development need that is of primary relevance when judging the extent to which the Green Belt contributes. The extent of development on brownfield land in Watford over the last decade suggests that the Green Belt has played a role in encouraging urban regeneration, but looking forward the very low figure for remaining brownfield land suitable for housing (2.15ha) indicates that there is little scope for future development to be accommodated on these sites.. Although there is more brownfield land in Three Rivers, the housing need figures indicate that significantly more land will be needed if the latest housing targets are to be met. Councils are required by NPPF Paragraph 137 to utilise brownfield sites before concluding that exceptional circumstances exist to justify releasing Green Belt land, but the fact that available brownfield land will not be capable of meeting housing need suggests that in the future Green Belt land will not make a significant contribution to Purpose 5.
- 3.99 The extent to which Green Belt land would, if released, be capable of redirecting development away from brownfield sites, will in theory vary spatially, but there is no evidence that development pressures operate at a sufficiently localised level for variations in contribution to be identified within Watford and Three Rivers. Therefore the contribution of all Green Belt within Watford and Three Rivers is considered to be *limited*, and the Stage 2 study does not undertake any further assessment in relation to Purpose 5.

Stage 2 Step 2: Impact on integrity of adjacent Green Belt and boundaries

- 3.100 Once an assessment was undertaken of the potential impact to the contribution to the NPPF purposes, the nature of any boundary features was considered. This determined the extent to which adjacent land would incur loss of integrity through increased *containment* and/or loss of *distinction* between development and open land.
- 3.101 If the new Green Belt boundary results in a less distinct boundary between settlement and countryside, the Green Belt release under assessment is likely to weaken the wider Green Belt. However, even if a strong alternative boundary can be defined, there is potential for the remaining Green Belt to be weaker, due to increased containment. However in some locations it may be possible for a clearer Green Belt boundary to be defined – e.g. through use of a feature that marks a stronger, or more widely consistent, distinction between an urban area and countryside.
- 3.102 A rating was given for impact on integrity of adjacent Green Belt, using a four-point scale of: *significant / moderate / minor / no or negligible*. A significant impact would occur where the release of land would significantly increase the containment of adjacent land that plays a stronger role in relation to the Green Belt purposes and release would result in a significantly weaker distinction between the inset settlement and the Green Belt ie change from a strong Green Belt boundary to a weaker, or more convoluted boundary. A negligible or no impact would occur where release would not lead to the containment of any adjacent land, or would contain Green Belt land that plays a weaker role in relation to the Green Belt purposes and release would result in no significant change in strength of distinction between the inset settlement and the Green Belt, or may even result in a clearer or more consistent Green Belt boundary.
- 3.103 The extent of this impact is limited by the strength of adjacent Green Belt – e.g. the increased containment of land that is already largely contained by development will constitute less of an impact than the containment of land that has a stronger relationship with the wider countryside.

Stage 2 Step 3: Assessing overall harm

3.104 Green Belt harm is rated using a seven-point scale ranging from *very high* to *very low* harm²⁵:



3.105 The harm judgement combines steps 1 and 2, considering on the one hand the impact of release in terms of loss of that land's contribution to Green Belt purposes and on the other the impact of release on the remaining Green Belt, to arrive at an overall judgement. **Figure 3.2** provides an indication as to how the loss of contribution to the Green Belt purposes (x axis) and the strength of the boundary and impact on adjacent Green Belt (y axis) influence the overall harm of Green Belt release. However **professional judgement** is required in each individual case to consider how much weight to attach to each contributing element.

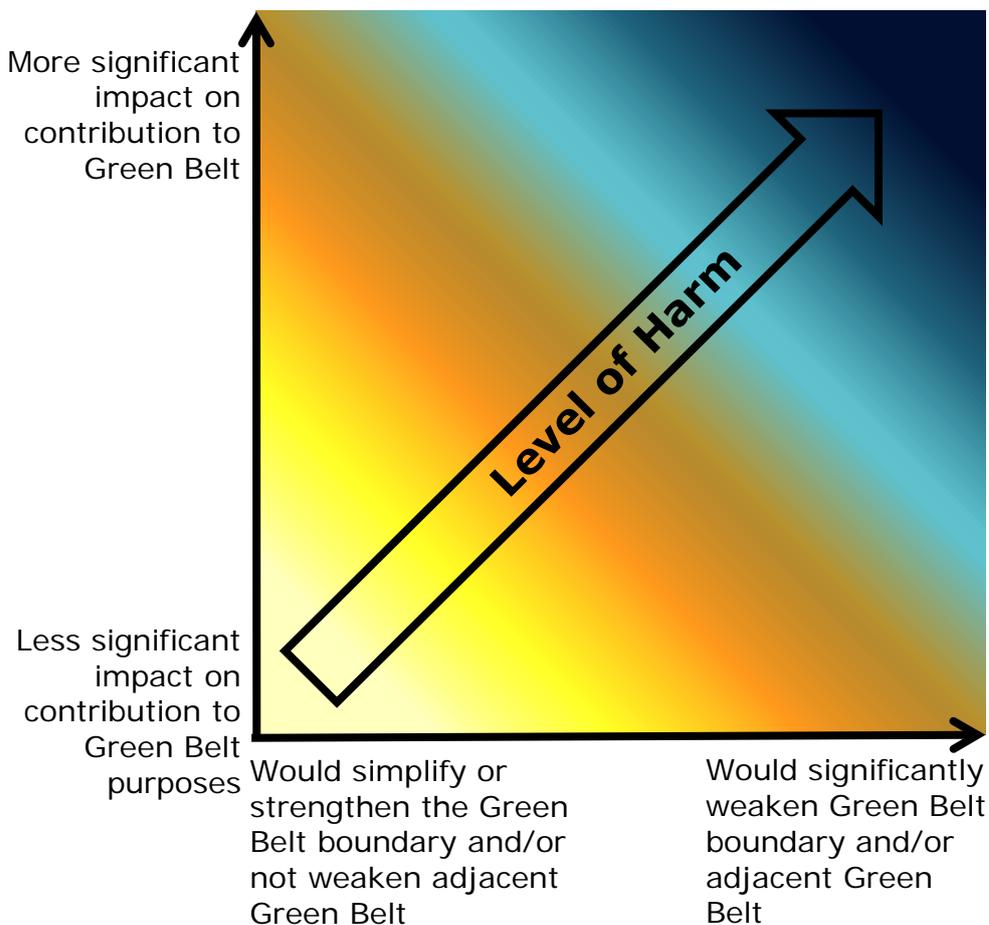
3.106 For example:

- Where release of land has a significant impact on contribution to multiple Green Belt purposes, or a very significant impact on a single purpose, and where its release would weaken the adjacent Green Belt (for example by leaving a narrow gap between towns), harm is likely to be **very high**.
- Where release of land has a significant impact on contribution to one of the Green Belt purposes, and where its release would partially weaken adjacent Green Belt (for example by increasing its containment by urban areas), harm is likely to be **high**.
- Where release of land has a moderately significant impact on the contribution to one of the Green Belt purposes and a less significant impact on others, but where its release would significantly weaken the adjacent Green Belt (for example by isolating an area of Green Belt that makes a stronger contribution), harm is likely to be **moderate-high**.
- Where release of land has a moderately significant impact on the contribution to two of the Green Belt purposes and a less significant impact on the contribution to the others, but where its release would partially weaken the adjacent Green Belt (for example by increasing containment of adjacent open land, or by creating a less consistent boundary line), harm is likely to be **moderate**.
- Where release of land has a relatively significant impact on the contribution to one of the Green Belt purposes, but where its release would create a simplified, more consistent boundary and would not weaken the adjacent Green Belt, harm is likely to be **low-moderate**.
- Where release of land has a relatively limited impact on the contribution to one of the Green Belt purposes and limited impact on the contribution to the others, and its release would not weaken the Green Belt boundary or the integrity of adjacent Green Belt land, harm is likely to be **low**.
- Where release of land has limited or no impact on the contribution to all Green Belt purposes, and its release would not weaken the integrity of adjacent Green Belt land, or would create a more consistent boundary better reflecting the distinction between urban settlement and countryside, harm is likely to be **very low** (*No parcels were assessed to have the potential to cause very low harm to the Green Belt if released*).

²⁵ No parcels were assessed to have the potential to cause very low harm to the Green Belt if released.

- 3.107 Clear and detailed justification is provided for all ratings (see **Appendix 1**) given in relation to how the overall judgement of Green Belt harm has been reached.
- 3.108 In some instances potential to release a smaller part of a parcel with less harm than release of the parcel as a whole was identified, but clear boundary features to define such an area were lacking. Any such cases are noted within the analysis.
- 3.109 If Green Belt harm from release of a parcel adjacent to the existing settlement edge was assessed at less than *high*, consideration was given as to harm associated with the release of land further from the settlement edge. If an area in which harm would still be less than *high* was identified, this was defined as a separate parcel; however if the settlement-edge parcel's outer boundary was found to mark a transition to *high* or *very high* harm the analysis to support this judgement is presented under the heading 'harm beyond outer boundary' rather than through definition of a new parcel.

Figure 3.2 Guidelines for rating harm on the basis of contribution to Green Belt purposes and impact of release on adjacent Green Belt



Stage 2 Assessment Outputs

- 3.110 The assessments are grouped by settlement (subdivided in the case of Watford) (see **Appendix 1**). Each grouping has:
- An OS map showing the location of the settlement within the area;
 - An OS map showing the Stage 2 assessment zone parcels around the settlement and any areas of absolute constraint. Each parcel is coded with reference to the settlement – e.g. CH1, CH2, etc for land around Chorleywood;

- An OS map showing the Stage 2 assessment zone parcels around the settlement, with colour-shaded variations showing the harm rating between parcels, and any areas of absolute constraint; and
- A table listing the parcels around the settlement and the assessed potential harm to Green Belt purposes from release of each parcel.

3.111 For each parcel associated with the settlement there is:

- An aerial view showing the parcel boundary;
- An OS map showing the parcel boundary and any development constraints;
- Photo(s) of the parcel;
- Description of the parcel, including its boundaries and relationship with inset settlements and the wider Green Belt;
- Rating and supporting text assessing impact of release on contribution to the Green Belt Purposes 1-5 within the parcel;
- An analysis of the potential impact of release on the strength of adjacent Green Belt land and Green Belt boundaries;
- Rating and supporting text assessing the overall harm to the Green Belt purposes of release of the parcel, considering loss of contribution of the area released and impact on the strength of adjacent Green Belt land;
- Comment on potential for a more limited release of land within the parcel to limit harm to the Green Belt purposes; and
- Commentary justifying why harm resulting from release of land beyond the outer boundary of the parcel would be at least high (only provided for parcels forming the outside of the assessed area where the harm rating for the parcel is less than high).

4 Summary of Findings

Introduction

- 4.1 This chapter sets out the findings of the assessment of Green Belt harm.
- 4.2 As outlined in **Chapter 3**, the assessment of harm included the following steps:
- Step 1: Considered the impact on the contribution to the NPPF purposes.
 - Step 2: Assessed the potential impact of release on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries.
 - Step 3: Assessed the overall Green Belt harm and any variations of harm within the 'assessment zone'.

Summary of Findings

- 4.3 The findings of the assessment of harm are summarised by settlement and parcel in **Table 4.1**. In addition, **Figure 4.1a-d** show the parcels and absolute constraints to development and **Figure 4.2a-d** show the potential degree of harm that would result if the parcels were released.
- 4.4 Detailed findings of the assessment of harm are included in **Appendix 1**, organised by settlement. In some cases a parcel may lie adjacent to two settlements. In this case an assessment of the same parcel has been included under both settlements eg LW2 and RW17 but the assessments assume development out from the respective settlement being considered.

Table 4.1: Green Belt assessment of harm ratings

Settlement	Parcel	Harm Rating
Abbots Langley	AL1	Moderate-High
	AL2	Moderate
	AL3	Moderate-High
	AL4	Moderate
	AL5	Low-Moderate
	AL6	Moderate
	AL7	Moderate-High
	AL8	Moderate-High
	AL9	High
	AL10	Very high
Batchworth	BW1	Moderate
	BW2	Moderate-High
	BW3	Low-Moderate
	BW4	Moderate-High
	BW5	Moderate-High
	BW6	High
	BW7	Moderate-High
	BW8	Low-Moderate
	BW9	Moderate

Settlement	Parcel	Harm Rating
	BW10	Moderate-High
Bedmond	BM1	Low
	BM2	Low-Moderate
	BM3	Moderate
	BM4	Low
	BM5	Moderate-High
	BM6	Moderate
	BM7	Moderate-High
	BM8	Moderate-High
	BM9	High
Chorleywood	CH1	Moderate-High
	CH2	Moderate
	CH3	Moderate-High
	CH4	Low
	CH5	Low-Moderate
	CH6	Moderate-High
	CH7	High
	CH8	Very High
	CH9	Moderate
Croxley Green	CG1	Moderate
	CG2	High
	CG3	Low-Moderate
	CG4	High
	CG5	Moderate
	CG6	Moderate
	CG7	High
	CG8	Moderate-High
	CG9	High
	CG10	Moderate
	CG11	High
	CG12	High
Hemel Hempstead	HH1	Very High
	HH2	Very High
Kings Langley	KL1	High
	KL2	Moderate-High
	KL3	High
	KL4	Moderate-High
	KL5	Moderate
Loudwater	LW1	Moderate-High
	LW2	Moderate
	LW3	High
	LW4	Moderate
	LW5	High
	LW6	Low-Moderate

Settlement	Parcel	Harm Rating
	LW7	High
	LW8	Moderate
	LW9	Low-Moderate
Maple Cross	MC1	Moderate
	MC2	Low-Moderate
	MC3	Low-Moderate
	MC4	Moderate
	MC5	Moderate-High
	MC6	Low-Moderate
	MC7	Moderate-High
	MC8	Low
	MC9	Moderate
	MC10	High
	MC11	Low-Moderate
Northwood	ND1	Moderate
	ND2	Moderate
	ND3	Moderate
	ND4	Moderate-High
	ND5	Moderate
	ND6	Moderate-High
	ND7	High
	ND8	Moderate
	ND9	Low-Moderate
	ND10	Moderate
	ND11	Moderate-High
	ND12	Moderate-High
Rickmansworth	RW1	Moderate
	RW2	Low-Moderate
	RW3	Low-Moderate
	RW4	Low-Moderate
	RW5	Moderate
	RW6	Low
	RW7	Moderate-High
	RW8	Moderate
	RW9	Low-Moderate
	RW10	Low-Moderate
	RW11	High
	RW12	Moderate
	RW13	High
	RW14	Moderate
	RW15	Moderate
	RW16	Moderate-High
	RW17	Moderate
	RW18	Low-Moderate

Settlement	Parcel	Harm Rating
South Oxhey	SO1	High
	SO2	High
	SO3	Very High
	SO4	Moderate
	SO5	Low-Moderate
	SO6	Very High
	SO7	Low-Moderate
	SO8	Low
	SO9	Low-Moderate
Watford East	WE1	Low
	WE2	Very High
	WE3	Low-Moderate
	WE4	Low-Moderate
	WE5	High
	WE6	Moderate-High
	WE7	Moderate-High
	WE8	Low-Moderate
	WE9	High
Watford North	WN1	Moderate
	WN2	Low-Moderate
	WN3	Moderate
	WN4	Moderate
	WN5	Low-Moderate
	WN6	Moderate-High
	WN7	Low-Moderate
	WN8	Moderate-High
	WN9	Moderate
	WN10	Moderate
Watford South	WS1	Moderate-High
	WS2	Low-Moderate
	WS3	High
	WS4	Low-Moderate
	WS5	Moderate-High
	WS6	High
	WS7	Moderate
Watford West	WW1	Moderate
	WW2	Moderate-High
	WW3	Moderate
	WW4	Moderate-High
	WW5	Moderate
	WW6	Low-Moderate
	WW7	Low
	WW8	Moderate-High
	WW9	Moderate

Settlement	Parcel	Harm Rating
	WW10	Moderate-High
	WW11	Moderate-High

- 4.5 **Table 4.2** summarises the area of land within assessed parcels that falls within each category of harm (excluding any identified absolute constraints). . The harm rating for release of any Green Belt land outside of this assessment area in association with expansion of inset settlements (or Bedmond) would be at least ‘high’.

Table 4.2: Total area of land assessed at each harm rating

Harm Rating*	Total Area of Land (excluding constraints)	
	Area (ha)	Percentage of Parcelled Green Belt
Very High	231.7	9.3
High	679.4	27.4
Moderate-High	790.7	31.8
Moderate	487.7	19.6
Low-Moderate	244.2	9.8
Low	49.5	2.0

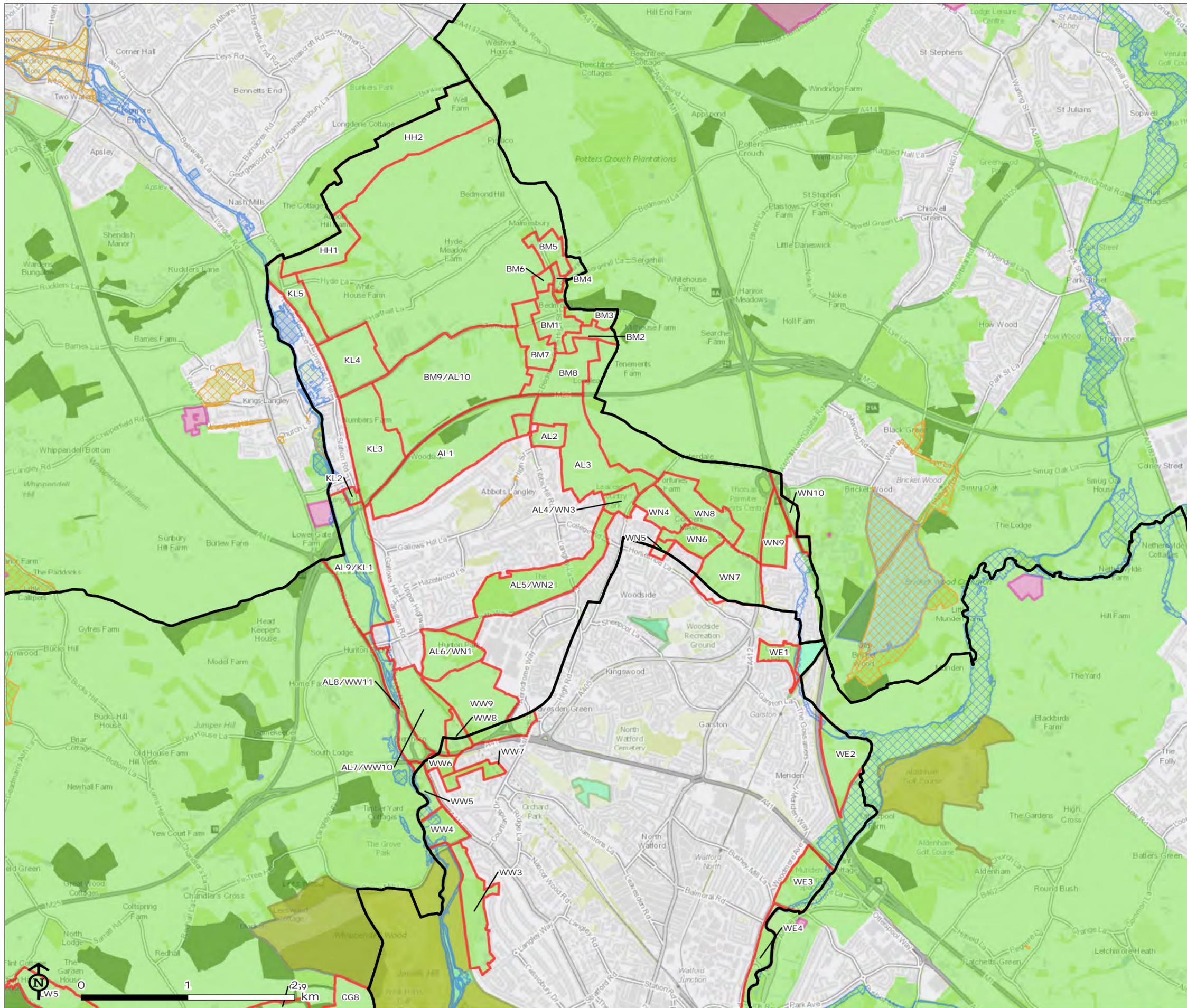
*Note that where an area is assessed in the context of release from more than one settlement, and the resultant harm ratings are different, it is the lowest of the ratings that is reported in this table.

Role of Green Belt Harm Assessment

- 4.6 As outlined above, consideration of the *harm* to the Green Belt that could result from the release of land for development is an essential part of establishing the exceptional circumstances for making alterations to Green Belt boundaries. However, there are other important factors that need to be considered, most notably sustainability and deliverability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in *high* or *very high* harm to the Green Belt.
- 4.7 In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation. In light of this, this assessment of harm to the Green Belt purposes does not draw conclusions as to where land should be released to accommodate development, but identifies the relative variations in the harm to the designation.
- 4.8 The Study does not assess the cumulative impact of the release of multiple parcels on the Green Belt as a whole. That lies outside the scope of this Study as there are numerous permutations of the parcels that could be considered for release.

Three Rivers District Green Belt Review Stage 2

Figure 4.1a
Assessment parcels and absolute constraints (N)



- Parcel Boundary
- Green Belt
- District Boundary
- Flood Zone 3b
- Local Nature Reserve
- Registered Parks and Gardens
- Scheduled Monument
- Ancient Woodland
- National Nature Reserve
- SSSI
- Common Land

Map Scale @A3: 1:35,000

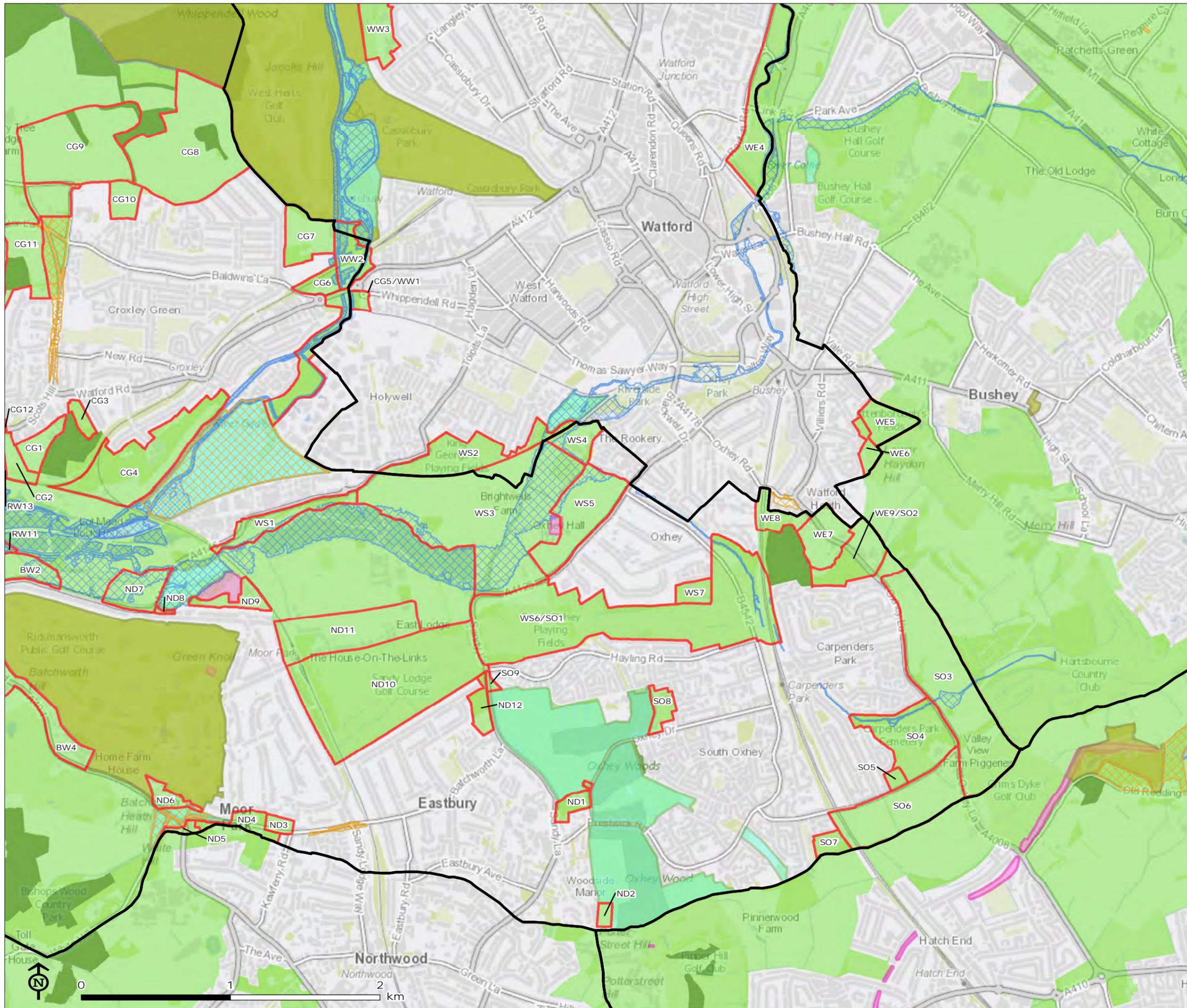


Three Rivers District
Green Belt Review Stage 2

Figure 4.1b

Assessment parcels and absolute constraints (SE)

- Parcel Boundary
- Green Belt
- District Boundary
- Flood Zone 3b
- Local Nature Reserve
- Registered Parks and Gardens
- Scheduled Monument
- Ancient Woodland
- National Nature Reserve
- SSSI
- Common Land



Map Scale @A3: 1:25,000

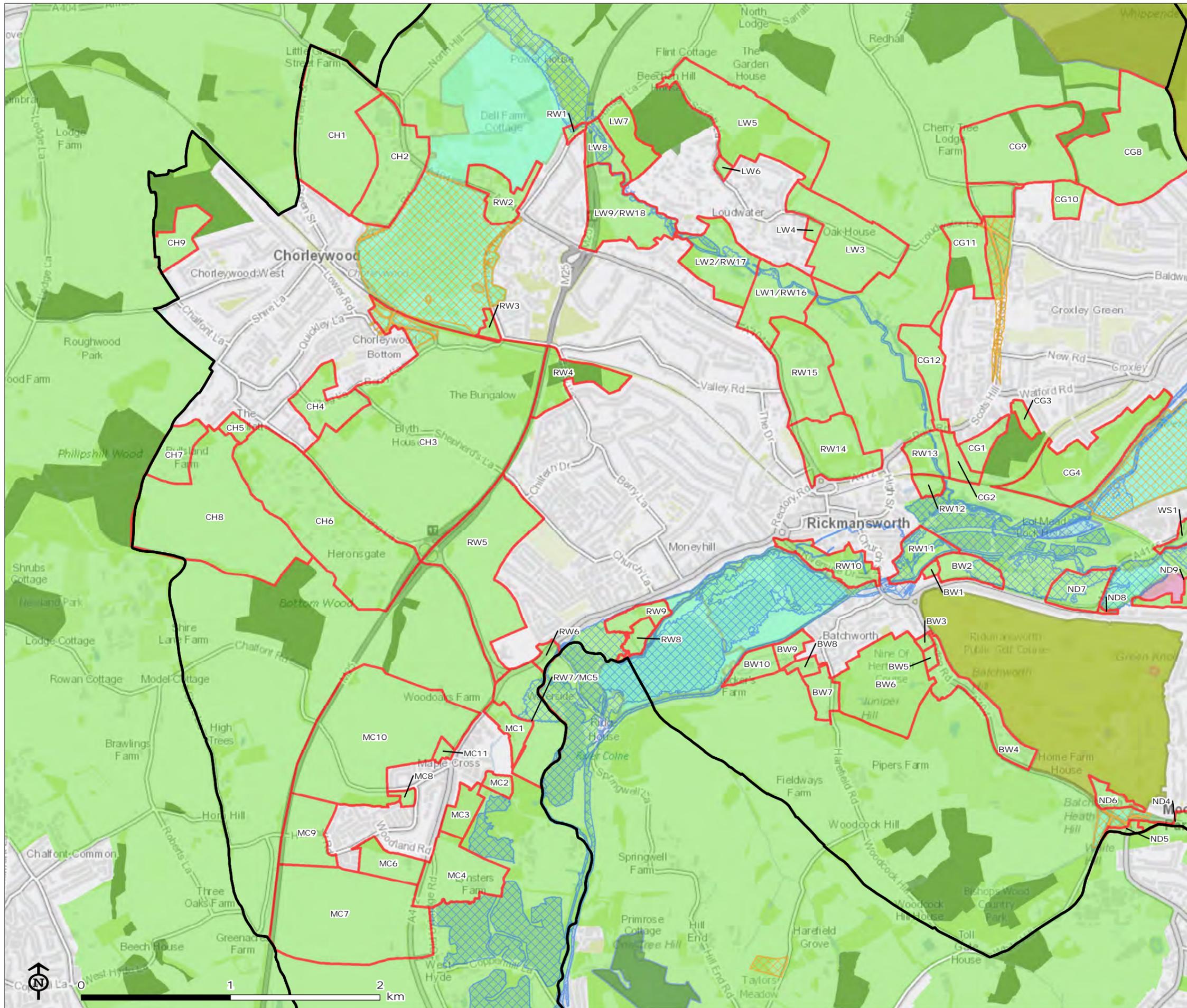


Three Rivers District
Green Belt Review Stage 2

Figure 4.1c

Assessment parcels and absolute constraints (SW)

- Parcel Boundary
- Green Belt
- District Boundary
- Flood Zone 3b
- Local Nature Reserve
- Registered Parks and Gardens
- Scheduled Monument
- Ancient Woodland
- National Nature Reserve
- SSSI
- Common Land

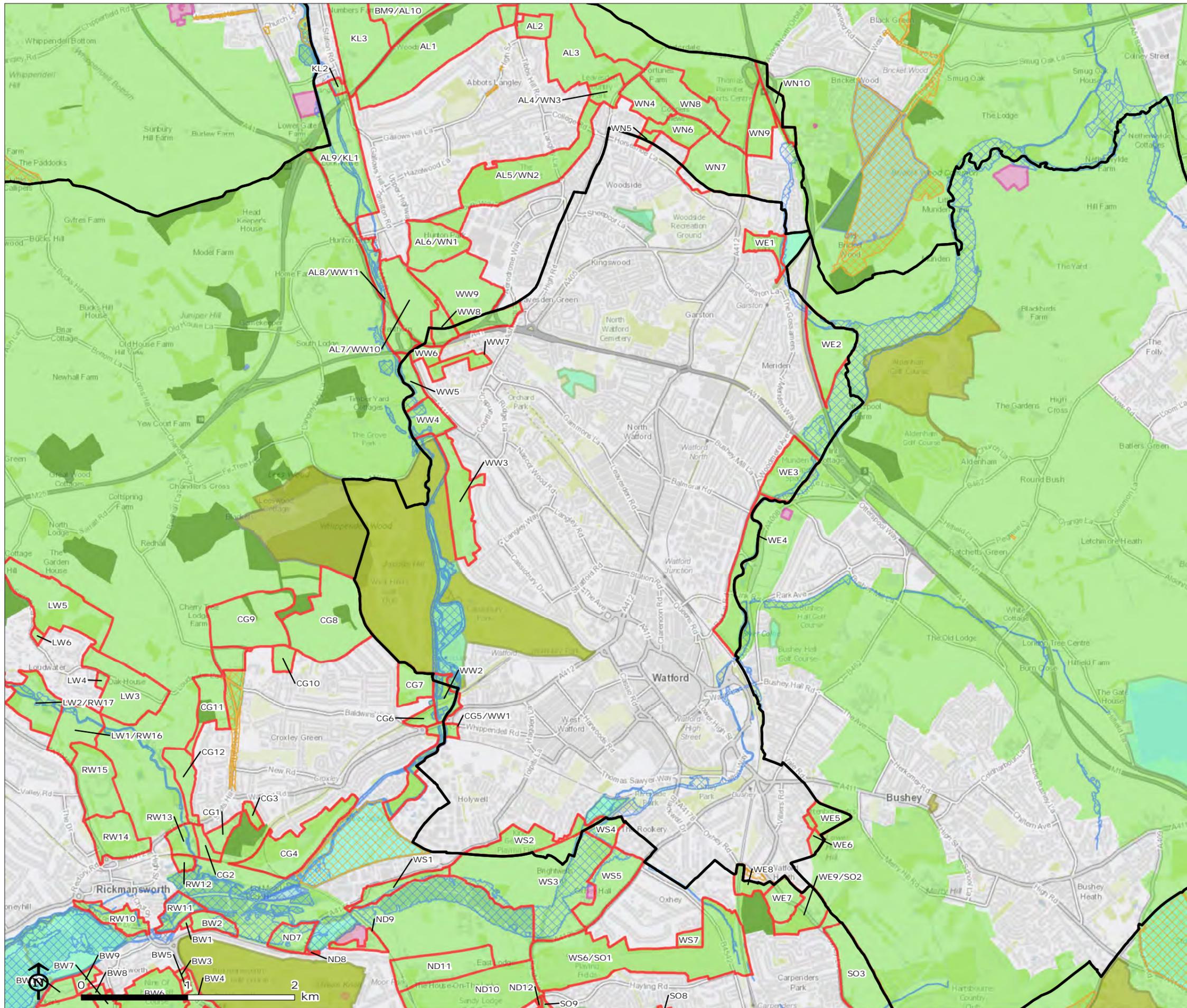


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Three Rivers District
Green Belt Review Stage 2

Figure 4.1d
Assessment parcels and absolute constraints (Watford)



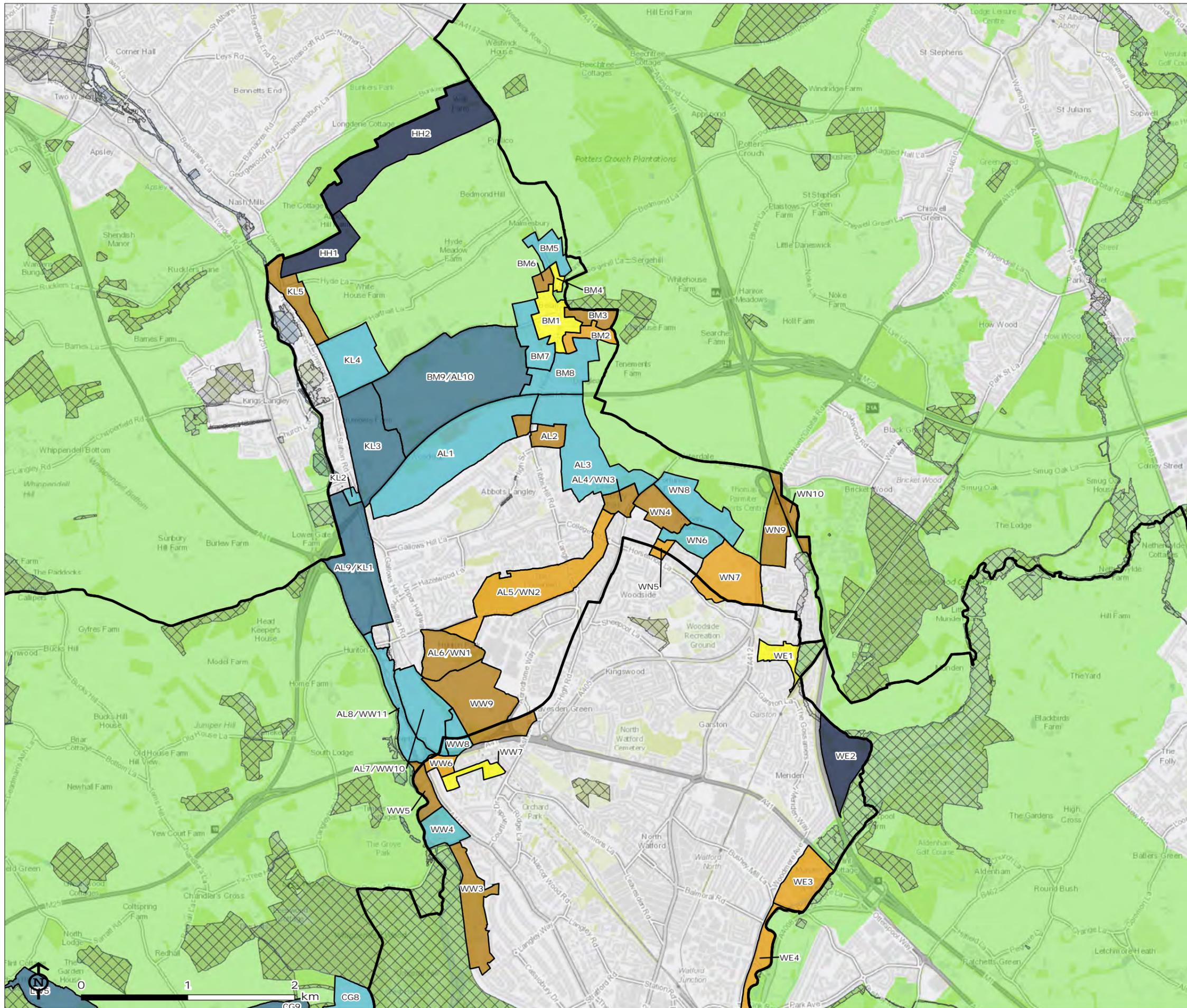
- Parcel Boundary
- Green Belt
- District Boundary
- Flood Zone 3b
- Local Nature Reserve
- Registered Parks and Gardens
- Scheduled Monument
- Ancient Woodland
- National Nature Reserve
- SSSI
- Common Land

Map Scale @A3: 1:35,000



Three Rivers and Watford Green Belt Review Stage 2

Figure 4.2a
Green Belt Harm Overview (N)



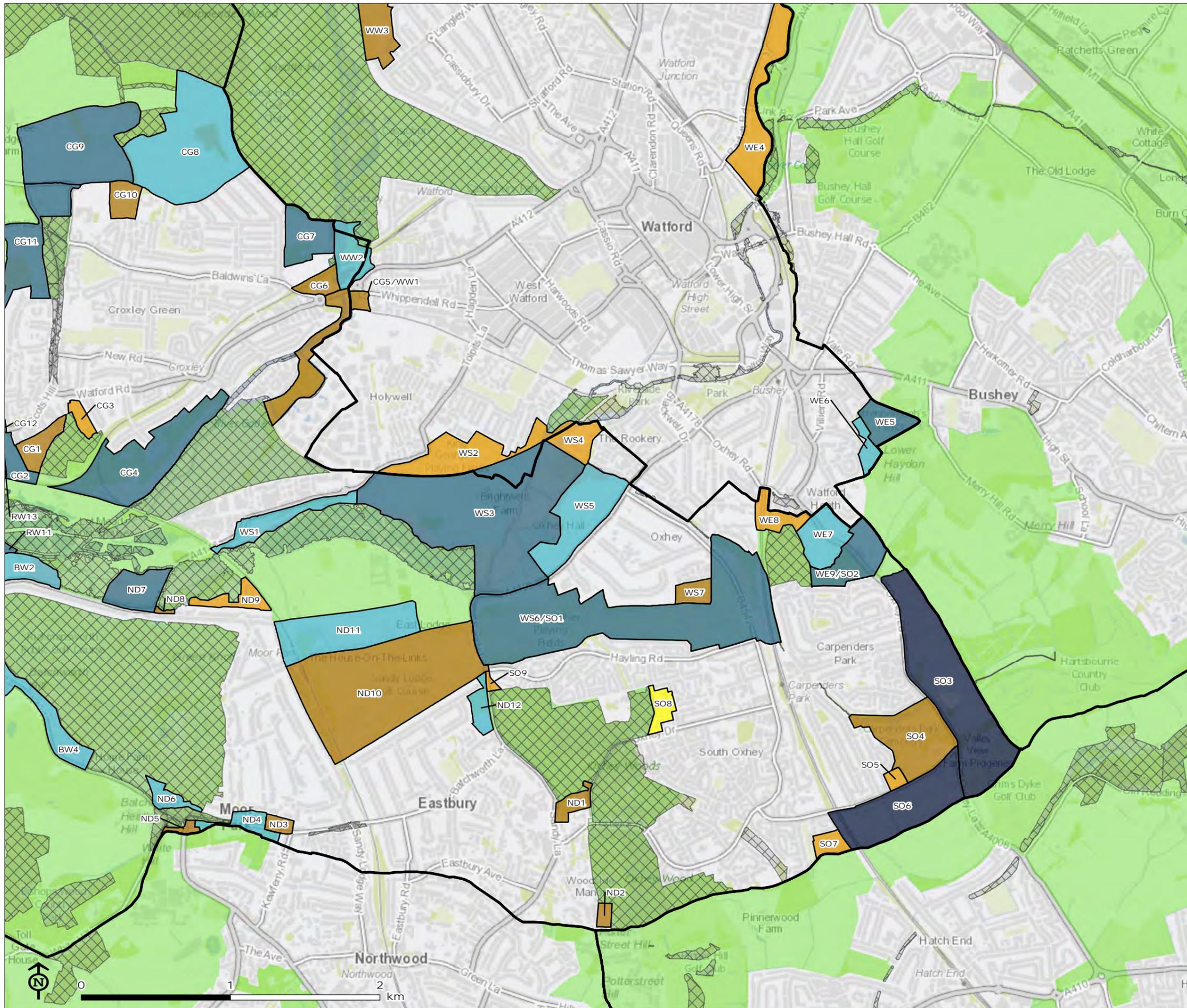
- District Boundary
- Green Belt
- Absolute Constraints
- Parcel Harm
 - Very High
 - High
 - Moderate High
 - Moderate
 - Low Moderate
 - Low

Map Scale @A3: 1:35,000



Three Rivers and Watford Green Belt Review Stage 2

Figure 4.2b
Green Belt Harm Overview (SE)



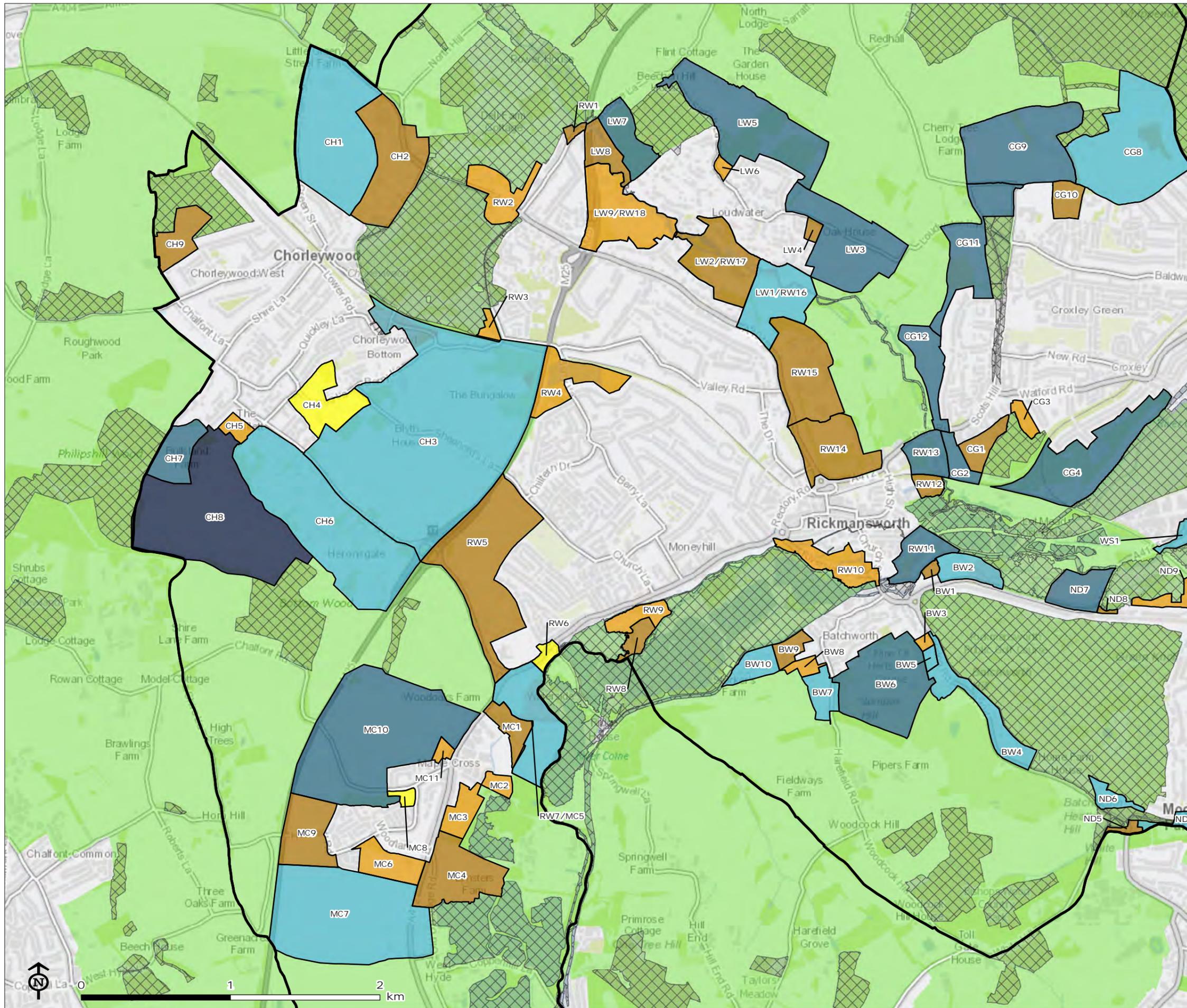
- District Boundary
- Green Belt
- Absolute Constraints
- Parcel Harm
- Very High
- High
- Moderate High
- Moderate
- Low Moderate
- Low

Map Scale @A3: 1:25,000



Three Rivers and Watford Green Belt Review Stage 2

Figure 4.2c
Green Belt Harm Overview (SW)



- District Boundary
- Green Belt
- Absolute Constraints
- Parcel Harm
 - Very High
 - High
 - Moderate High
 - Moderate
 - Low Moderate
 - Low

Map Scale @A3: 1:25,000

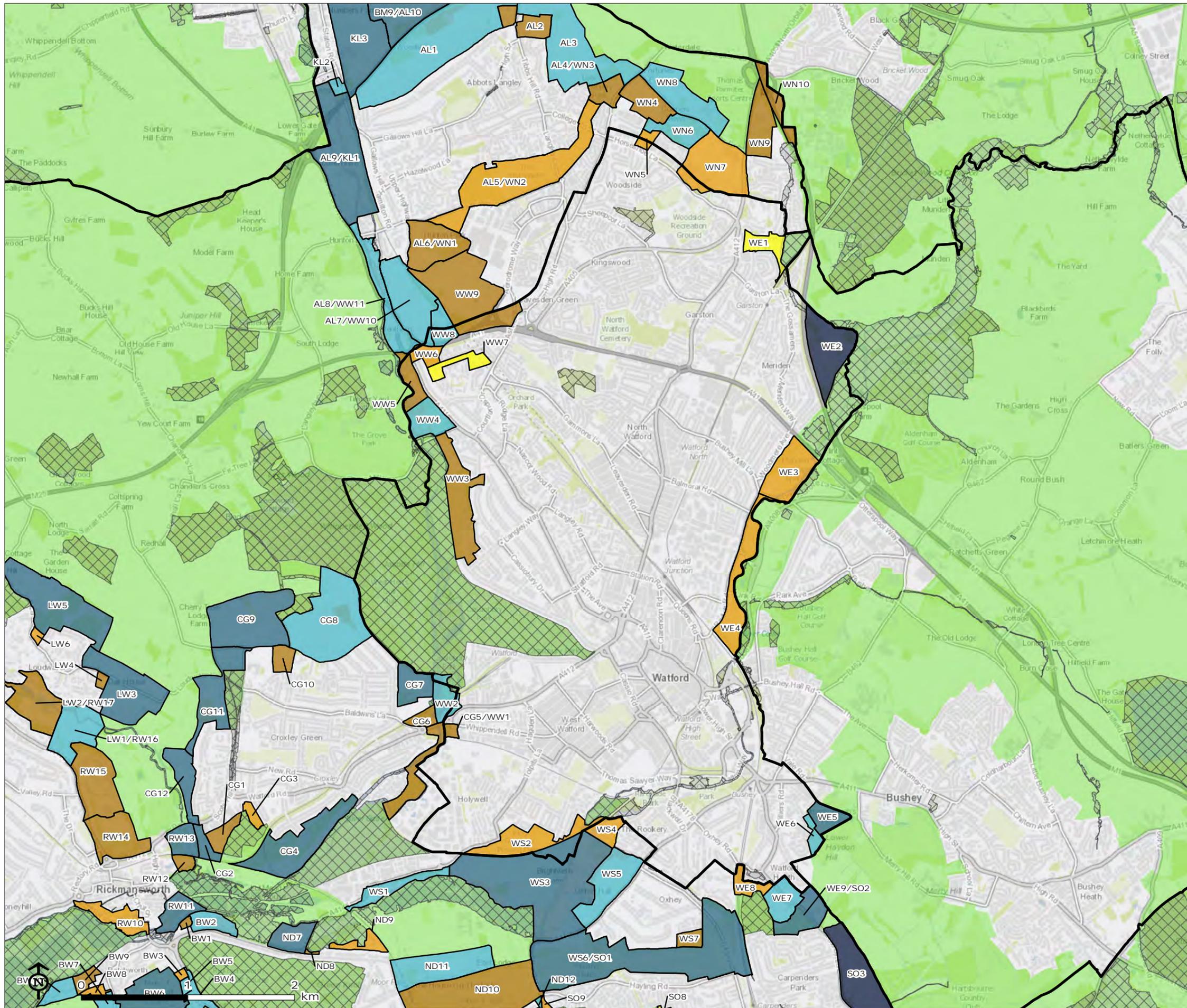


Three Rivers and Watford Green Belt Review Stage 2

Figure 4.2d

Green Belt Harm Overview (Watford)

-  District Boundary
-  Green Belt
-  Absolute Constraints
- Parcel Harm**
-  Very High
-  High
-  Moderate High
-  Moderate
-  Low Moderate
-  Low



Map Scale @A3: 1:35,000



5 Making Changes to the Green Belt

Introduction

- 5.1 The following chapter sets out the key steps that the Councils should consider if there is an identified need to release land from the Green Belt. The chapter also sets out potential mitigation measures that could be applied to reduce the potential harm to the Green Belt, if land is released. This is followed by a discussion of the potential opportunities for enhancing the beneficial use of the Green Belt (in line with Paragraph 141 of the NPPF). However, it should be noted that this Chapter does not contain an exhaustive list of potential mitigation measures or enhancement opportunities. It is therefore recommended that mitigation and enhancement are carefully considered when more detailed information about proposed developments is available.

Making Changes to the Green Belt

- 5.2 The NPPF requires changes to the Green Belt to be made through the Development Plan process. If such changes are made, the process should include demonstration of exceptional circumstances, including consideration of the need to promote sustainable patterns of development, i.e. planning for economic growth, housing need, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience.
- 5.3 A common interpretation of the policy position is that, where necessitated by development requirements, plans should identify the most sustainable locations for growth. This policy position should be maintained unless outweighed by adverse effects on the overall integrity of the Green Belt according to an assessment of the whole of the Green Belt based around the five purposes²⁶. In other words, the relatively poor performance of the land against Green Belt purposes is not, of itself, an exceptional circumstance that would justify release of the land from the Green Belt. Conversely, higher performing Green Belt may be appropriate for release where exceptional circumstances are demonstrated.
- 5.4 Before concluding that 'exceptional circumstances' exist to justify changes to the Green Belt, Paragraph 137 of the NPPF states that local authorities should demonstrate that all other 'reasonable options' for meeting its identified need for development have been considered. In particular local authorities need to consider whether their strategy:
- 1) makes effective use of suitable brownfield sites and underutilised land;
 - 2) optimises the density of development in town and city centres and other locations well served by public transport; and
 - 3) explores whether other authorities can help to meet some of the identified development requirement.
- 5.5 Should the Councils decide to release land from the Green Belt, careful consideration also needs to be given to the form of the amended Green Belt boundaries. As set out in Para 139 of the NPPF:
- "When defining Green Belt boundaries, plans should:*
- *ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
 - *not include land which it is unnecessary to keep permanently open;*

²⁶ Planning Advisor Service (2015) Planning on the Doorstep: The Big Issues – Green Belt. Available at: www.local.gov.uk/pas/pas-support/councillor-development/planning-doorstep-big-issues.

- *where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- *be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”*

Mitigation to Reduce Harm to Green Belt

The concept of mitigation

- 5.6 One of the factors weighed up in the judgement of harm resulting from the release of a Green Belt area, is the impact that the loss of openness would have on other Green Belt land. This is assessed by considering how neighbouring land would rate in terms of its contribution to Green Belt purposes were the area in question to be urbanised i.e. would its contribution be weakened? In many cases this is a key factor in the judgement: a site might in itself be small but its development could represent a more significant change than its physical area might suggest if, for example, it resulted in the breaching of a strong boundary feature, or an increase in the built containment of adjacent land.
- 5.7 There is the potential to reduce harm to the remaining Green Belt by implementing measures which will affect the relationship between the remaining Green Belt land and urban areas. Measures which increase the contribution that land is judged to make to Green Belt purposes, offsetting to some degree the predicted reduction in contribution, could strengthen the case for release of a particular area. However, any release of Green Belt land will still require ‘exceptional circumstances’ to be demonstrated.
- 5.8 Mitigation could apply either to land being released or land being retained as Green Belt. There is an overlap between the latter and the concept of beneficial use of Green Belt land as set out in the NPPF, in that mitigation can also present an opportunity to enhance beneficial use.

Mitigation themes

- 5.9 The extent to which harm can be mitigated will vary from site to site, but potential measures can be considered under different themes. The Green Belt purposes are considered to relate to the relationship between the land area in question, developed land, and the countryside. This relationship is influenced by: the location of the area; the extent of openness within it; and the role of landscape/physical elements, including boundary features (in either separating the area from, or connecting it to) built-up areas and the wider countryside.
- 5.10 **Table 5.1** below lists some mitigation measures that could be considered as part of the planning and development process. Which mitigation measures are the most appropriate will vary, depending on local circumstances.

Table 5.1: Potential measures to mitigate harm to Green Belt

Mitigation measure	Benefits	Considerations
Use landscaping to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance.	Maintaining sense of separation between urban and open land.	A boundary that is relatively homogeneous over a relatively long distance, such as a main road, is likely to be stronger than one which has more variation. Landscaping works can help to minimise the impact of ‘breaches’

Mitigation measure	Benefits	Considerations
		in such boundaries.
Strengthen boundary at weak points – e.g. where ‘breached’ by roads	Reducing opportunities for sprawl.	The use of buildings and landscaping can create strong ‘gateways’ to strengthen settlement-edge function.
Define Green Belt edge using a strong, natural element which forms a visual barrier – e.g. a woodland belt.	Reducing perception of urbanisation, and may also screen residents from intrusive landscape elements within the Green Belt (e.g. major roads).	Boundaries that create visual and movement barriers can potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents.
Create a transition from urban to rural, using built density, height, materials and landscaping to create a more permeable edge.	Reducing perception of urbanisation.	This may however have implications in terms of reducing housing yield.
Consider ownership and management of landscape elements which contribute to Green Belt purposes.	Ensuring permanence of Green Belt.	Trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (e.g. within back gardens).
Enhance visual openness within the Green Belt.	Increasing perception of countryside.	Although openness in a Green Belt sense does not correspond directly to visual openness, a stronger visual relationship between countryside areas, whether directly adjacent or separated by other landscape elements, can increase the extent to which an area is perceived as relating to the wider countryside.
Enhance access within the Green Belt.	Increasing perception of countryside.	Uses of the countryside that permit an appreciation of it as a connected area with valued characteristics can counter urbanising influences – e.g. enhancement of connectivity of rights of way to avoiding truncation by major roads, or provision of access along the Green Belt boundary to strengthen its role.

Mitigation measure	Benefits	Considerations
Improve management practices to enhance countryside character.	Increasing strength of countryside character.	Landscape character assessment can help to identify valued characteristics that should be retained and where possible strengthened, and intrusive elements that should be diminished and where possible removed.
Design and locate buildings, landscaping and green spaces to minimise intrusion on settlement settings.	Maintaining perceived settlement separation by minimising the extent to which new development intrudes on the settings of other settlements.	Analysis of settlement settings, including consideration of viewpoints and visual receptors, can identify key locations where maintenance of openness and retention of landscape features would have the most benefit.
Maintain/create separation between existing washed-over settlement and new inset settlement.	Minimising urbanising influences that could weaken the justification for retaining the washed-over settlement's status.	Ensure that the gap is sufficiently wide to maintain a sense of separation.
Design road infrastructure to limit perception of increased urbanisation associated with new development.	Reducing perception of urbanisation.	Increased levels of 'activity' can increase the perception of urbanisation.
Use sustainable drainage features to define/enhance separation between settlement and countryside.	Strengthening separation between urban and open land.	Need to determine if local topography and ground conditions are suitable.

Beneficial Use of Green Belt

- 5.11 The purposes of the Green Belt do not make any reference to the quality or use of land falling within the designation, but Paragraph 141 of the NPPF, states that:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, 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.”

- 5.12 Furthermore, Paragraph 138 of the NPPF states that where it has been concluded that it is necessary to release Green Belt land for development, plans should *“set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”*. This could be achieved through legal agreements in conjunction with the release of land and planning consent for development, or through strategic enhancement initiatives e.g. creation of community woodland.
- 5.13 The NPPF suggests different types of beneficial use. They relate principally to the environmental quality of the land, but can also, through strengthening boundary/buffer roles and affecting landscape and visual character, affect the contribution of land to Green Belt purposes.

- 5.14 The updated Planning Policy Guidance (PPG) also endorses the preparation of supporting landscape, biodiversity or recreation evidence to identify appropriate compensatory improvements, including:
- 'new or enhanced green infrastructure;
 - woodland planting;
 - landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
 - improvements to biodiversity, habitat connectivity and natural capital;
 - new or enhanced walking and cycle routes; and
 - improved access to new, enhanced or existing recreational and playing field provision.'

Potential opportunities to enhance use

- 5.15 Some of the mitigation measures listed in the previous section which relate to Green Belt land can also be considered beneficial uses, but there is broader scope for introducing or enhancing uses of Green Belt land that (by adding to its value) will strengthen the case for that land's future protection, regardless of whether it is classified as Green Belt. Some examples are provided in **Table 5.2** below.
- 5.16 Beneficial uses could be achieved through planning conditions, section 106 obligations and/or the Community Infrastructure Levy. The PPG stresses the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance.

Table 5.2: Potential beneficial uses of Green Belt

Beneficial use	Considerations
Improving access	Enhancing the coverage and condition of the rights of way network and increasing open space provision.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
Landscape and visual enhancement	Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
Increasing biodiversity	Most Green Belt land has potential for increased biodiversity value – e.g. the management of hedgerows and agricultural field margins, and provision of habitat connectivity, planting of woodland. There may also be opportunities to link enhancements with requirements to deliver 'biodiversity net gain' associated with development proposals.
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

- 5.17 It is noted however, that Local Authorities may still be able to protect features such as open spaces, leisure facilities, burial grounds and nature conservation sites through other policy approaches/designations.

Conclusion

- 5.18 This Stage 2 Study has assessed the *harm* to Green Belt purposes of releasing land for development at the settlement-edges to facilitate the expansion of inset settlements. The findings of this study will form an important piece of evidence for the emerging Three Rivers and Watford Local Plans.
- 5.19 However, as outline above there are other important factors that need to be considered when establishing exceptional circumstances for making alterations to Green Belt boundaries, most notably sustainability and viability issues. Whilst the ideal would be to minimise harm to the Green Belt, it may be that the most sustainable locations for development will result in *high* or *very high* harm to the Green Belt.
- 5.20 In each location where alterations to Green Belt boundaries are being considered, planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt designation. In addition, consideration will also need to be given to potential measures to mitigate harm to the Green Belt, as well as potential opportunities to enhance the beneficial use of the Green Belt. It is noted that many potential enhancement opportunities may relate to land which is in private ownership and therefore careful consideration will need to be given to how and if these opportunities can be delivered.
- 5.21 Should the Councils decide to release land from the Green Belt, it is suggested that outline policy guidance or masterplans could be prepared as part of, or following on from the Local Plan process. Masterplans could draw on the findings of the Green Belt Study and any detailed site-based Green Belt assessment work to indicate precise development areas, new permanent Green Belt boundaries (existing or new features) and appropriate considerations for the layout and design of new developments and opportunities to enhance beneficial use. Such an approach, together with specific policies for the development of the land, would help to minimise harm to the remaining Green Belt.