

Green Belt Topic Paper (August 2025)

1 Introduction

- 1.1 Three Rivers District Council is preparing a new Local Plan, which will guide development up to 2041. To explain and support many of the themes in the emerging Local Plan, the Council will produce several topic papers, which present background information and evidence to set the scene for discussion and engagement.
- 1.2 The topic papers are intended to be 'living' documents, which will be updated throughout the plan-making process in order to reflect updated evidence, changes to the policy context, and the outcomes of the various stages of consultation and engagement. The topic papers do not contain any policies, proposals, or site allocations.
- 1.3 This Green Belt Topic Paper aims to gather and summarise local Green Belt evidence and serve as a starting point for a review of the evolution of previous policies and growth strategies in relation to the Green Belt, tied to the progression of national policy and growth requirements within the context of the district. It also looks at the latest national policy and how we might interpret that going forward, as well as summarising the circumstances and interpretation of growth requirements in neighbouring boroughs and districts, and Neighbourhood Plans covering the district.

2 Policy Context

National Planning Policy Framework

- 2.1 The National Planning Policy Framework (NPPF) published in December 2024 sets out the Government's planning policies for England and how these should be applied. It provides a framework within which Local plans must be produced.
- 2.1 Paragraphs 145-149 of the NPPF relate to altering Green Belt boundaries. Paragraph 145 states 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..."*.
- 2.2 Following on from this, paragraph 146 states:

"Exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan".
- 2.3 These exceptional circumstances are only engaged if the plan can demonstrate it has fully considered all other reasonable options for development, as set out in paragraph 147. For this, the plan needs to show that it:
 - a) makes as much use as possible of suitable brownfield sites and underutilised land;
 - b) optimises the density of development in line with the policies in chapter 11 of this Framework, 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

c) 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.

2.4 Additionally, paragraph 148 states:

“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework....”.

2.5 Grey belt is a new concept introduced through the update to the NPPF in December 2024. It refers to Green Belt that is either previously developed land or land that does not strongly contribute to Green Belt purposes (a) to check the unrestricted sprawl of large built-up areas, (b) to prevent neighbouring towns merging into one another, or (d) to preserve the setting and special character of historic towns. This leaves two of the five Green Belt purposes not being considered when grey belt is being identified; purposes (c) to assist in safeguarding the countryside from encroachment and (e) to assist in urban regeneration.

2.6 Paragraph 149 sets out the considerations a local authority must have when defining those Green Belt boundaries in terms of sustainability, necessity, and permanence, both in terms of using recognisable features, but making enough land available so not to require further alteration at the end of the plan period.

2.7 In relation to affordable housing within the Green Belt, paragraph 67 of the NPPF states:

“As part of the ‘Golden Rules’ for Green Belt development set out in paragraphs 156-157 of this framework, a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, either on land which is proposed to be released from the Green Belt or which may be permitted on land within the Green Belt. This requirement should:

a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and

b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability)”.

2.8 As alluded to in the policy above, the ‘golden rules’ are a new requirement designed to offset the impact of lowering the bar for Green Belt release. Paragraphs 156 and 157 set this out in further detail and scope. In terms of affordable housing, the policy sets an interim measure that allows for a 15% uplift on current local affordable housing policies, with a 50% cap, until local policy is updated in paragraph 157 and other requirements set out in paragraph 156 are the requirements to provide necessary improvements to local or national infrastructure and *‘the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces’.*

Planning Practice Guidance (PPG)

Grey Belt Land

- 2.9 The latest update to the PPG provides further specific advice on the size of parcels and their subdivision and how assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes.
- 2.10 Paragraph 005 sets out guidance on how to assess purposes A, B and D, which forms the basis of the judgement of whether land constitutes grey belt. These purposes are Purpose A - to check the unrestricted sprawl of large built-up areas, Purpose B - to prevent neighbouring towns merging into one another and Purpose D - to preserve the setting and special character of historic towns. Examples of illustrative features that make a 'strong', 'moderate' or 'weak' contributions to the purposes are provided. The guidance also sets out that villages are not included in the assessment of purposes A and B.
- 2.11 The NPPF requirement to release Green Belt in full to meet an area's development needs unless the release of Green Belt would fundamentally undermine the purposes of the Green Belt when taken as a whole, across the plan area, means it is now more difficult to protect Green Belt from development. Paragraph 008 considers this, setting out that *'in reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way'*.

Identifying sustainable locations

- 2.12 Paragraph 011 sets out the consideration of sustainable locations when reviewing Green Belt boundaries and that 'the need to promote sustainable patterns of development should determine whether a site's location would be appropriate for the kind of development proposed.' Similarly, grey belt land should not be treated any differently when it comes to appropriate locations. If grey belt land is in a location that is not, or cannot be made sustainable, then it would be inappropriate for that type of development.

Potential impact of development on the openness of the Green Belt

- 2.13 Finally, paragraphs 013 and 014 deal with the openness of the Green Belt and how it should be considered. This is a judgement based on circumstances and subsequently there are guiding principles that need to be taken account of. These include:
- 'openness' is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume
 - the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness
 - the degree of activity likely to be generated, such as traffic generation'
- 2.14 Paragraph 014 sets out how openness can be considered when it is not inappropriate development in the Green Belt, in the case of previously developed land or grey belt. The tests of impacts to openness or the purposes are considered to have been addressed and therefore 'very special circumstances' are not required to be met.

3 Local Context

South-West Hertfordshire Joint Strategic Plan

- 3.1 The South-West Hertfordshire Joint Strategic Plan (JSP) will cover the area covered by the South-West Hertfordshire partner authorities. These are Dacorum Borough Council, Hertsmere Borough Council, St Albans City and District Council, Watford Borough Council and Three Rivers District Council.
- 3.2 As set out on its website, the South-West Hertfordshire Joint Strategic Plan 'will provide a long-term blueprint for the south-west Hertfordshire area to 2050. It will consider and address issues that cross council boundaries and will set out a strategic vision for the area. It will also help guide future Local Plans and strategies by setting out high level policies on topics such as climate change, net zero carbon, infrastructure provision, environmental protection, employment and housing. Once approved, the Joint Strategic Plan will provide a coordinated overarching framework that will guide local decision making on planning matters'.
- 3.3 In the summer of 2022, a formal public consultation (Regulation 18) was carried out. In August 2023, a "shared vision" and set of principles used to inform progress of the JSP was published. The next stages of the JSP involve consultation on options for the scale and pattern of growth.
- 3.4 The JSP will be producing a strategic Green Belt review for the whole of the South-West Hertfordshire area. This will effectively be a Stage 1 style review for the sub-region.

Three Rivers' Current Development Plan

- 3.5 Three Rivers District Council adopted the "Core Strategy" on 17th October 2011 and this document forms part of the Local Development Framework. As the Council's Core Strategy was adopted in 2011 it is considered out-of-date (over 5 years from adoption).
- 3.6 The Core Strategy set a target of 180 dwellings per annum between the plan period of 2001-2026. Between 2001-2018, the average number of new dwellings delivered each year was 207 (resulting in an over delivery of 460 dwellings), which exceeded the 180 target set out in the Core Strategy. At the time, the plan stated that approximately 25% of the housing was to be in the Green Belt.
- 3.7 However, by the time the Regulation 18 Part 1 and 2 Regulation consultations were published in 2021, Three Rivers' target was 630 dwellings per year, or 12,624 for the plan period, a three-and-a-half-fold increase on the 2011 targets. Subsequently, not only had the target increased dramatically, but available land outside of the Green Belt had reduced due to development exceeding the old local plan targets for a number of years.
- 3.8 Therefore, since then, and since numerous exercises to try and find more urban sites, fewer than 1,000 homes can be built on previously developed land outside of the Green Belt. The issue is only getting more acute with the new methodology set out by the government, who's formula increases the numbers of homes in unaffordable areas. The target has risen to 832 dwellings per annum or 13,312 dwellings across the plan period, under the new standard method.

Three Rivers' Emerging Local Plan

- 3.9 The Council have undertaken the following consultations with regards to its emerging Local Plan and where relevant, the Green Belt approach has been summarised:

Local Plan 'Issues & Options and Call for Sites Consultation Document', July 2017

- 3.10 The growth approach taken in this consultation was based on the Strategic Housing Market Assessment (SHMA) undertaken in 2016. The findings of this report concluded that 514 dwellings per annum would be required, a significant increase on the 180 per annum local plan figure. In this context, officers chose to consult on several options, a low growth option, 20% below the OAN figure (411 dwellings) a moderate growth option in line with the OAN figure and high growth, which was 20% above (617 dwellings). Of the respondents, 18% supported the low growth, 41% the moderate growth and 41% high growth, with a low response rate. In the context of Green Belt release, it was acknowledged that some Green Belt release would be necessary for all options given the increased level of need when compared to the previous plan, but the Green Belt wasn't discussed further in this consultation.

Local Plan 'Potential Sites Consultation', October 2018

- 3.11 This consultation set out potential site options, including those within the Green Belt.

3.12 Local Plan 'Preferred Policy Options' (Part 1) and 'Sites for Potential Allocation (Part 2)' Regulation 18 Consultation, June 2021

- 3.13 The approach to this consultation was against the backdrop of the introduction of the standard method in 2018 and a Local Housing Needs Assessment (SHMA update). The standard method increased need to 615 dwellings per annum, which was effectively the same as the high growth option indicated in the previous consultation. The LHNA applied the standard method within their study and the figure further increased to 630 dwellings for the consultation.

Local Plan 'Additional Sites for Potential Allocation' (Part 3) Regulation 18 Consultation, January 2023

- 3.14 The 2021 consultation did not identify enough sites to meet the housing need, (1318 dwellings short) so further consultation on additional sites was undertaken.

Local Plan 'Three Rivers' Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land' (Part 4) Regulation 18 Consultation, October 2023

- 3.15 The main reason for this consultation and lower growth approach, was in response to the Secretary of State's letter the previous year, that stated Green Belt removal was not a requirement to meet housing need. Although this was not explicitly set out in national policy, there were alterations to the 2023 NPPF that the calculation for setting out housing need under the standard method was now an 'advisory starting point' and paragraph 145 stated that local authorities may choose (but are not required to) review and alter Green Belt boundaries in the event that they cannot meet their housing need.
- 3.16 This was taken as justification to aim for a lower level of growth and would be primarily based on the level of harm of removing areas of Green Belt for development. Given

that less than 10% of the need could be achieved without Green Belt development, it was acknowledged that some Green Belt release would still be necessary.

- 3.17 The decision was to use the Stage 2 Green Belt Review as a basis for this and only remove areas of Green Belt with a harm rating of 'moderate' or below. This resulted in an objectively assessed need of 4852 homes, of which 2385 were to be built in the Green Belt. The standard method figure was 11,466 for 18 years period to 2041.

Local Plan 'Newly Submitted Sites and New Policies' (Part 5) Regulation 18 Consultation, July 2025

- 3.18 The current Regulation 18 consultation is seeking views on newly submitted sites as a result of a call for sites exercise undertaken earlier this year. The majority of the sites are within the Green Belt. The consultation is not relating to a specific growth strategy, rather seeking further information on the sites. The council has significant concerns about the majority of the sites and these are unlikely to come forward in the Local Plan.

Current Position

- 3.19 Following the publication of the updated NPPF in December 2024, it was agreed at Full Council that the low growth approach should be aborted as it would likely be found unsound by an inspector at examination. Members then agreed to pause the Local Plan process while further evidence work was undertaken. A new Local Development Scheme (LDS) was published in December 2024, which details that the Regulation 19 consultation is scheduled for February/March 2026 and submission to the Planning Inspectorate in April/May 2026.
- 3.20 As indicated previously, we are now required to provide for 832 dwellings per annum over a 16-year period, resulting in 13,312 dwellings. This is 1846 more than the previous standard method figure.

New Green Belt Policy

- 3.21 In terms of consultation on the Green Belt approach, the June 2021 Part 1 Regulation 18 consultation proposed a new Green Belt policy option. This was updated in the summer of 2024 and was taken to the October 2024 Local Plan Sub Committee. However, in December 2024 the NPPF (and subsequently the PPG) was updated with wide-ranging changes to Green Belt policy from both a plan-making and decision-making perspective.
- 3.22 Subsequently, we are revising our Green Belt policy again to take account of the changes to the NPPF, particularly regarding grey belt, updated exceptions to inappropriate development within the Green Belt and the Golden Rules for Green Belt sites.

Neighbourhood Plans

- 3.23 There are currently three adopted Neighbourhood Plans within the District (Croxley Green, Chorleywood and Batchworth). Two other Parish Councils (Sarratt and Abbots Langley) are also currently producing Neighbourhood Plans. In their current iterations, neither the adopted nor any of the emerging Neighbourhood Plans include specific site allocations for housing development. Whilst the three adopted Neighbourhood Plans contain policies aiming to protect the Green Belt and, in some cases, improve it, Neighbourhood Plans cannot amend nationally produced policy directly and make decisions on altering Green Belt boundaries. Neighbourhood

Plans' main tool for protecting green space is the designation of Local Green Spaces, which gives green spaces of community importance similar protection as the Green Belt, when meeting specific criteria.

Neighbouring Local Authority Local Plans

- 3.24 The other south-west Hertfordshire authorities and other adjoining authorities (outside of south-west Hertfordshire) are at different stages of the Local Plan process. A summary of these different stages can be seen below:

Watford Borough Council:

- 3.25 The Watford Local Plan was adopted on 17th October 2022. The Plan sets out that "at least 13,328 net additional homes, equivalent to at least 784 new homes per year, will be delivered in Watford between 2021 and 2038". This met Watford's standard method requirement in full at the time. Watford is around 19% Green Belt and the vast majority of that is set to be preserved, by concentrating development into high density regeneration of their urban land, with the 'Core Strategic Development Area' taking 80% of their allocation. Only around 2Ha of land appears to be allocated within the Green Belt.

St Albans City and District Council:

- 3.26 The St. Albans City & District Local Plan was submitted to the Secretary of State for Independent Examination on 29 November 2024. The submitted Local Plan states that "*following the Government's required 'Standard Method' for calculating local housing need, the Council will identify and allocate land for the delivery of at least 14,603 net additional new houses, or 885 per annum in the period 1 October 2024-31 March 2041*".

As the local authority submitted their plan within the transition period for meeting the new standard method target, the local authority is able to demonstrate that they are meeting the old standard method figure, but are committing to an early review of the plan. St Albans is 81% Green Belt, and although it does have some brownfield land, it will not be able to get close to delivering its target in these previously developed areas. The 'garden communities' that form urban extensions to Hemel Hempstead within St Albans District, will be taking approximately 30% of development, or 5,000 homes across three sites, with north St Albans taking more than 1,000 and north-east Harpenden and West Redbourn being other significant Green Belt sites of over 500 homes.

Dacorum Borough Council:

- 3.27 Dacorum Borough Council submitted their Local Plan to the Secretary of State for public examination in March 2025. The pre-submission version of the Plan sets out that "*Strategic Policy H1 (Delivering the Housing Strategy) sets a strategy that meets the standard method figure of 1,016 dwellings per annum in full through a mixture of site allocations, commitments and a windfall allowance*". However, like St Albans, they submitted their plan under the transitional arrangements period and will need to commit to an early review of the plan.
- 3.28 Although Dacorum has more brownfield land in Hemel Hempstead than most neighbouring authorities, it is still unable to meet its requirement without releasing Green Belt. The largest of the allocations is north of Hemel Hempstead, where 5000 homes will eventually be provided beyond the plan period (1500 within the current

period, not accounting for the early review) and 250ha of Green Belt land to be released. Other significant releases include East of Tring, with 83ha released from the Green Belt for 1400 homes, 36ha at Shendish Manor, Hemel for 500 homes and 30ha released at Polehanger Lane for around 750 dwellings with similar plans at Land South of Berkhamsted.

Hertsmere Borough Council:

- 3.29 The most recent Regulation 18 Consultation took place between May and June 2024. This Regulation 18 Consultation set out a target of delivering 9,396 dwellings, meeting just over 75% of the standard method figure which was in force at the time of publication of the consultation.
- 3.30 This strategy does not propose allocation of sites in areas of Green Belt that meet the purposes strongly, leading to a reduction in Green Belt being removed of around 300ha, equating to the 75% of the target figure (standard method) being proposed. It should be noted, however, that although the onus at this point was still strongly on meeting the need, this was before guidance was strengthened in terms of meeting the assessed need in December 2024.
- 3.31 The proposed release of Green Belt is predominantly through the new settlement in the countryside (Bowmans Cross) eventually providing 5000 new homes, with 2400 homes in the plan period. The only other 500 dwelling plus allocation is likely to be at Potters Bar Golf Course.

London Borough of Harrow:

- 3.32 The London Borough of Harrow submitted their Local Plan for examination at the end of February this year. The Plan “proposes to adopt a housing requirement/target of 16,040 homes between 2021-41 (being the annualised London Plan target of 802 homes per year over the 20-year plan period), in compliance with the London Plan”. As such, the Harrow Local Plan is planning to meet the relevant London Plan target at the time when it is submitted for examination. However, there is a risk that if the plan is not adopted by March 2026, that the housing target could rise to 2137 homes per annum.
- 3.33 Just over 20% of Harrow’s area is Green Belt. Aside from the redevelopment of the Royal Orthopaedic Hospital, providing a new rationalised modern hospital and approximately 500 homes, it is possible for them to meet their targets within the built up/previously developed area. This land would now meet the definition of previously developed land and grey belt under the new guidance, but the plan nonetheless argues that it sits under very special circumstances as enabling development for a new hospital. Clearly, if the target was to increase significantly, the release of Green Belt land would seem inevitable.

London Borough of Hillingdon:

- 3.34 The call for views consultation (Regulation 18) finished on Monday 24 June 2024. The Local Development Scheme (July 2024) sets out that the Regulation 19 Consultation will take place from March 2025 to April 2025, but there appears to be no further updates or consultation at this stage.
- 3.35 Prior to the most recent review, the Local Plan Part 2 in 2020, Hillingdon did not consider that major adjustments to the Green Belt boundary would be necessary for the plan period to accommodate required growth, although minor adjustments to the

Green Belt boundary were required. However, this was based on just 426 homes per year being needed. The London Plan in 2021 allocated 1083 homes per year for Hillingdon and although it is not currently clear what their detailed strategy for meeting this need is, it would be expected that this would require larger incursions into the Green Belt.

Buckinghamshire Council:

- 3.36 According to their website, Buckinghamshire Council are at an early stage of their plan-making process. Buckinghamshire Council have undertaken an early engagement questionnaire, vision and objectives consultation and a call for sites. The previous LDS set out that publication and submission will take place between January 2026 and August 2026. However, this has recently been updated, and they are currently in the plan preparation stage, with a Regulation 18 consultation indicated for September or October of this year.
- 3.37 In the context of the above authorities, it is important to note paragraph 62 of the NPPF which sets out that “in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”. Duty to Co-operate meetings to discuss housing matters have been and will continue to be undertaken between Three Rivers and neighbouring areas.

4 Current and Future Evidence Base

4.1 Stage 1 Green Belt Review

- 4.1.0 A Stage 1 Green Belt Review (August 2017) was undertaken jointly with Watford which strategically reviewed Green Belt purposes, looking at 83 strategic parcels. It also considered the character and role of villages within the Green Belt to assess the suitability of continued and potential in-setting of villages within the Green Belt, as required by the NPPF.
- 4.1.1 The main areas of Green Belt within Three Rivers District was identified as ‘more remote’ open countryside to the west and north west of Rickmansworth and the M25, and the open countryside between Watford and Rickmansworth.
- 4.1.2 The purpose of the review was to determine the contribution that each parcel of land made to the Green Belt as a whole, initially categorised by ‘Significant contribution’, ‘Contribution’ and ‘Limited contribution’ against the five purposes set out in the NPPF.
- 4.1.3 Parcels were defined utilising Ordnance Survey maps following natural and man-made boundaries in the landscape, from streams and hedgerows to tracks and motorways. Parcels were generally more naturally finer grain towards settlement edges, due to a higher proliferation of boundary edges.
- 4.1.4 Assessments included such elements as land use, degree of enclosure or openness and relationship with the countryside, when considering the purposes of the Green Belt. There was no scoring or weighting associated with the assessment, so the work rested solely on the professional judgement of the consultant. Subsequently, a significant contribution in one category could lead to an overall significant contribution if that was its primary purpose, even if other categories only resulted in a limited score, however, ‘contribution’ scores across the board may only lead to an overall categorisation of that, as it would be its highest score.

- 4.1.5 There was also an assessment into whether existing villages should remain 'washed over' in the Green Belt, by virtue of their continued contribution to the Green Belt purposes, particularly in respect of maintaining openness. This was done by looking at such aspects as current density and layout and general character, including setting, topography and location. This was carried out on the villages of Heronsgate, Bedmond and Sarratt.
- 4.1.6 In terms of the results, the Green Belt was found to be fulfilling its intended strategic purpose, that is maintaining a sense of openness through its permanence and application of development restraint. There were only 4 parcels that had a limited contribution to the overall purpose but many more had more than one significant contribution, which according to the report, creates a complex picture on the context of growth and removal of Green Belt land at a strategic level.
- 4.1.7 Looking at the inset villages of Sarratt, Bedmond and Heronsgate, the report suggested that Sarratt and Heronsgate remained washed over, whereas Bedmond could be inset, to allow for some local development needs. Although Bedmond was described as a relatively small village, it is more densely developed, particularly towards the centre, limiting its relationship with the wider Green Belt. Heronsgate on the other hand, was 'notably' low density' blending into the countryside, particularly on its southern edge, and Sarratt was found to be of generally open character, with a large conservation area, including the village green, contributing to this.
- 4.2 Stage 2 Green Belt Review
- 4.2.0 A Stage 2 Green Belt assessment (October 2019) considered the effect of releasing Green Belt land for development purposes. A total of 152 parcels of land were assessed in this exercise, an indication of the finer grain approach for the stage 2 assessments. The assessment looked at the impact on three purposes as well as the relationship between settlement and countryside. Purpose 1 was the parcels relationship with the large built-up areas; Purpose 2 was the relationship with neighbouring towns, and 3 the relationship with the countryside. The ratings given were significant/relatively significant/moderate/relatively limited and limited or no impact.
- 4.2.1 Further steps were then taken in the Stage 2 assessment as it looked at the relative impact of releasing the parcels of Green Belt land for development on the integrity of the remaining Green Belt. This was done by looking at the current and future strength of the boundaries within the parcels and adjacent areas of Green Belt to see if the overall strength of the Green Belt would be weakened, and to what extent, although there were some cases where a hypothetical change in the boundary could result in a stronger boundary edge. These were categorised into four categories: significant/moderate/minor and no or negligible.
- 4.2.2 The third and final step was undertaken by combining steps one and two (the impact of release in terms of the purposes and impact of release on the wider Green Belt) and this is the 'harm' judgement. This was split into seven categories on a sliding scale; very high, high, moderate-high, moderate, low moderate, low and very low. This was an exercise in professional judgement in each case and the consultant considered how much weight should be attributed to each contributing element.
- 4.3 In terms of overall harm, there were no parcels found to have very low levels of harm associated with them, and only 8 parcels (or 2%) being of low harm. The largest area of Green Belt by category was moderate high, which made up 31.8% of the total area, with high not being far behind, making up 27% of the total Green Belt area. The report

does conclude in stating that while it would be tempting to dismiss all sites that are high or very high harm for example, there are other factors that come into play, such as the overall sustainability of the settlement that it is on the edge of, so decisions based solely on Green Belt strength would not be recommended.

- 4.4 The report also goes on to make a number of other recommendations in terms of how the local authority might mitigate Green Belt harm and minimise the releases required as well as recommending beneficial uses of green belt and how it can be improved, including the mechanisms for funding this, for example via S106 agreements.

4.5 **Stage 3 Green Belt Review**

- 4.6 Finally, in 2020, there was a further assessment of the Green Belt in order to analyse variations in harm to the green belt purposes that could result from the creation of new inset settlements, distinct from the current inset areas, such as entirely new settlements.

- 4.7 The report sets out initially to identify areas that could accommodate a new settlement, meeting housing and density requirements and assess variations in the harm to Green Belt purposes if this land was released for development. The findings are then presented, organised by search area.

- 4.8 In order to find sufficient sized sites, a number of parameters needed to be identified. This included minimum dwelling numbers and density, including space for infrastructure and open space. In order to be relatively self-sustaining, a figure of a minimum of 3,000 dwellings was chosen at 40 dph, with a 70% gross to net ratio decided on for open space and infrastructure requirements. Although the precise minimum size site using this calculation was 107ha, 100ha was used as a minimum search size.

- 4.9 Seven potential new areas were identified for a settlement across the district. These broad areas made up the majority of open land that did not have an absolute constraint or was not within 250m of an existing settlement. The largest of these areas was to the northwest of the borough, split into three smaller parcels by the M25.

- 4.10 The assessment considered within each parcel the area of at least 100ha that would make the least contribution to green belt purposes. The assessment then considered as components of the overall harm the highest contribution for each Green Belt purpose within the area and rating for the level of impact on the contribution of adjacent Green Belt land that would result from release of the land in question. The Green Belt harm was rated in the same way as in the Stage 2 assessment.

- 4.11 In summary of the findings, 100ha releases of land in any search area were found to cause high or very high harm in all cases. Areas 1, 2 and 6 found south of Chorleywood, south of Rickmansworth and east of Abbots Langley respectively, release would cause very high harm and areas 3, north of Croxley Green and south of M25, 5, north of Abbots Langley, 7 between Abbots Langley and Leavesden and the M25 and 4 (which had 2 locations assessed within it on the northern edge of the district, including Bucks Hill and an area right across the parcel including Sarratt) would cause high harm.

Overall Conclusion of previous Assessments

- 4.12 Therefore, these studies showed overwhelmingly, the Green Belt in Three Rivers still performed the role it was intended to. It also showed that almost half of the Green

Belt would be considered to cause moderate-high or high harm if removed for development. There were similar results when searching for a new area for a standalone settlement, with all areas showing high or very high harm impact of a minimum of 100ha removed. The caveat to this is that the reports stated that harm should not be looked at in isolation and that such factors as sustainable locations should be considered when selecting sites in the Green Belt, even in the higher harm areas.

4.13 New Green Belt Assessment

- 4.13.0 Given that our housing (and other) needs cannot be met in full on land outside of the Green Belt, we are in the process of undertaking a further Green Belt Review to identify grey belt, and to assess whether altering Green Belt boundaries would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.
- 4.13.1 If it is considered that Green Belt land should be released, this would be undertaken using a sequential approach. The NPPF sets out that plans should give first consideration to previously developed land, then consider grey belt land which is not already previously developed and then consider other Green Belt locations. If need can still not be met on previously developed land and grey belt locations, other more sustainable sites in the Green Belt may have to be considered. To aid with this, the new Green Belt study will be mapping out the grey belt locations at the settlement edges across the district.
- 4.13.2 It should be noted that only sites in sustainable locations that are assessed as being suitable for development in the Strategic Housing and Employment Land Availability Assessment would be considered for potential allocation. Not all grey belt sites are appropriate for development. Therefore, much grey belt land will potentially be rejected as being either unsustainable or unsuitable.
- 4.13.3 As the concept of grey belt and the requirement to consider whether development in the plan would fundamentally undermine the function of the grey belt as a whole are new additions to national policy and guidance, the new Green Belt review must grapple with new this new policy and guidance, and consider definitions for terms therein, without any precedent.
- 4.13.4 A particularly challenging consideration has been around the definitions of towns and villages as well as the definition of large built-up areas. Specifically, when identifying grey belt, relating to Green Belt purpose (a) the guidance states that villages should not be considered large built-up areas. It also sets out that Green Belt purpose (b) only relates to the merging of towns not villages. These definitions have been fiercely debated in the planning community, and there are already examples of appeals where the planning inspector has had to judge whether a settlement is a town or a village in order to decide whether a site is grey belt or not. In terms of Green Belt protection, it is preferable to be identified as a town, although residents of settlements that are on the cusp of the large village/small town often prefer to refer to the settlement as a village.
- 4.13.5 Our current settlement hierarchy defines the district's settlements as the Principal Town, key centres, secondary centres, and villages, For the purposes of the Green Belt review we will be treating the Principal Town and key centres as towns.

- 4.13.6 Although villages are not considered in the assessment of Green Belt purposes (a) and (b), this does not mean that they cannot be protected by other policies that do not relate to Green Belt. Especially those relating to character such as paragraph 135 in the NPPF.
- 4.13.7 The report is currently being finalised by the consultants and the findings of the study will be added to the topic paper once it is ready to publish.

5 Conclusion

- 5.1 Through the introduction of grey belt, the government has significantly updated national Green Belt policy. The intention is to make it easier to release the poorest performing parts of the Green Belt for development.
- 5.2 The expectation is that local planning authorities will meet their development needs in full unless this would lead to the function of the Green Belt being undermined as a whole. As such, the government has set out in national policy that meeting housing need constitutes exceptional circumstances for Green Belt release. It is therefore clear that we are expected to release Green Belt land in order to meet the district's development needs.
- 5.3 Ultimately, changes to national policy have clarified the government position but little has changed materially. The overall thrust of the NPPF has always been to enable sustainable development and for local planning authorities to plan for the needs in their area with Green Belt release being required in exceptional circumstances.
- 5.4 The ongoing Green Belt Review will map out grey belt land and provide the strategic insight needed to assess whether the proposed development would undermine the function of the Green Belt as a whole.

The vast majority of development in the Local Plan will need to be in the Green Belt, and as such the Green Belt reviews undertaken by the council form a crucial part of the evidence base. It is difficult to see how meeting the standard method figure in full would not result in unacceptable harm to the Green Belt. It is therefore through this Green Belt evidence work that the council will be able to inform its decisions on where best to focus future growth. Once the review is completed, this topic paper will be updated with its findings.