

Three Rivers District Council

Sub-Committee Report

8 October 2025

LOCAL PLAN SUB COMMITTEE – 8 October 2025

PART I

Green Belt Review 2025 (DoF)

1 Summary

- 1.1 This report provides an overview of the 2025 Green Belt Review (Appendix 1) prepared to assist with the formulation of the Local Plan.
- 1.2 The officer recommendation is for Members of the Local Plan Sub-Committee to agree to publish the Green Belt Review on the Council's evidence base web page.

2 Background

- 2.1 Over three quarters (76%) of the District is designated as Green Belt. The remainder of the District is made up by the existing urban area consisting of small and medium sized settlements, with relatively little development potential within the urban area.

3 Summary of previous Green Belt Reviews

Stage 1 Green Belt Study

- 3.1 A Stage 1 Green Belt study (August 2017) was undertaken jointly with Watford which strategically reviewed the 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.
- 3.2 The Stage 1 study found the District's Green Belt 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.

Stage 2 Green Belt Study

- 3.3 The Stage 2 Green Belt study (October 2019) considered the effect of releasing Green Belt land for development purposes. A total of 152 parcels of land were assessed.
- 3.4 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 considered 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 were provided in relation to each assessed Green Belt purpose, and considered in combination to arrive at a single overall harm rating. The harm rating was expressed via a

sliding scale comprising of the following categories; very high, high, moderate-high, moderate, low moderate, low and very low.

- 3.5 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 making up 27% of the total Green Belt area. The report concludes that there are other factors that should be considered (not just overall Green Belt harm), such as overall sustainability (as some higher harm Green Belt may be located in sustainable locations) and consideration of potential measures to mitigate harm to the Green Belt, as well as potential opportunities to enhance the beneficial use of the Green Belt.

Stage 3 Green Belt Study

- 3.6 The Stage 3 Green Belt study analysed variations in harm to Green Belt purposes that could result from the creation of a new inset settlement, distinct from any existing inset areas.
- 3.7 In order to be relatively self-sustaining, a figure of a minimum of 3,000 dwellings was chosen for a new settlement, with a 100ha minimum search size. Across the district, seven areas were identified for a potential new settlement. However, the 100ha releases of land in all the search areas were found to cause high or very high harm in all cases and therefore the creation of a new settlement was not considered to be an appropriate growth strategy.

4 Green Belt Review 2025

- 4.1 Following agreement at Full Council in January that the council would produce further Green belt evidence, the council received government funding to produce an updated Green Belt Review as evidence supporting the preparation of the emerging Local Plan. This is a technical evidence base document produced by independent consultants. The Green Belt Review is assessed against the latest National Planning Policy Framework (NPPF, 2024) and latest Planning Practice Guidance (PPG). It should be noted that the primary purpose of this evidence is to support local plan preparation, however, it may also be used to assist in decision making.
- 4.2 The NPPF sets out that alterations to Green Belt boundaries should only be made in exceptional circumstances through the plan making process. It goes on to state that where authorities cannot meet their identified need for homes, commercial or other development through other means, then this constitutes the exceptional circumstances for Green Belt release, and that release should meet those needs in full. The NPPF, does include a caveat, adding: *“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.”*
- 4.3 Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries the council is required to demonstrate that it has fully considered all reasonable options for meeting its development needs. We have done this by making as much use of suitable brownfield sites and underutilised land as possible, but only a small proportion of our need can be met on such land. We have also increased densities on sites.
- 4.4 The NPPF also sets out that where it is necessary to release Green Belt land to meet development needs there is a sequential approach: *“plans should give*

priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.” In reality to meet the district’s development needs we will need to consider all Green Belt locations as previously developed land and grey belt locations won’t be able to provide the number of new homes required to meet the standard method target in full.

- 4.5 The key introduction of new policy in the 2024 NPPF is this concept of grey belt, defined as:

“land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.”

- 4.6 It should be noted that a potential site being identified as falling within an area of grey belt does not preclude that it is suitable for development and automatically mean it should come forward as a potential site allocation. It is only relevant when considering the site in terms of Green Belt and the site would need to be suitable in other planning terms. The NPPF also clearly caveats that the site needs to be in a sustainable location.
- 4.7 The 2025 Green Belt Review considered the council’s previous three stages of Green Belt Reviews summarised earlier in this report. It found that the previous reviews were still broadly in line with national policy. The fundamental aim (openness), purposes and permanence of Green Belt remain the same, and these were key principles underpinning the previous assessments.
- 4.8 The 2025 study concluded that the geographic scope of the Stage 2 and Stage 3 reviews was still considered robust and aligned with new national policy and guidance in that it sufficiently granular to enable assessment of the variable contribution of the Green Belt to the purposes as set out in the PPG.
- 4.9 Following the updated PPG clarifying the NPPF’s purposes (a), (b) and (d) do not relate to villages, the definition of towns in the district plays more of a prominent role. That said, the wording of the NPPF Green Belt purposes always related to towns and large built-up areas and the Stage 2 review therefore clearly defined the towns and large built-up areas in the district.
- 4.10 One of the primary purposes of the 2025 Green Belt Review is mapping out provisional grey belt. The word provisional has been used to emphasise that there still other factors to be considered prior to deciding whether land fully constitutes grey belt.
- 4.11 The map at Figure 6 in the Green Belt Review (2025) identifies provisional grey belt across the parcels that have been assessed at the settlement edge. Sites that fall outside the assessed areas would need to be considered on a case by case basis, though many of these sites would fall in unsustainable locations, and as such would not be brought forward even if considered provisionally grey belt.
- 4.12 The parcel level identification of grey belt is helpful at a strategic level for plan-making. However, when considering the identification of grey belt in decision making or for specific sites for allocation, it is more relevant to assess at a site-specific level to ensure the assessment outcomes reflect the site itself and is not skewed by the characteristics of land potentially some distance from the actual site. This means that development management and policy officers may need to make their own judgements where applications or potential sites only partially

overlap with assessed parcels or only make up a smaller proportion of parcels. It should be noted that at a further level of granularity, assessments of sites' contribution to the Green Belt may yield differing results to those achieved by the relevant parcels in the Green Belt Review.

- 4.13 A review of the previous washed over villages assessment undertaken as part of the Stage 1 Green Belt Review was conducted to consider whether any changes were necessary in light of the new policy and guidance. It was concluded that the approach taken is the assessment still aligned with current policy and guidance and could still be relied upon.
- 4.14 Consideration was also given as to whether there were any changes in circumstances, including the identification of grey belt that would require amendments to the conclusions reached in Stage 1 Green belt Review. After reviewing the physical and policy contexts for the villages, it is recommended that, in line with the Stage 1 Green belt Review, that Heronsgate and Sarratt should remain washed over within the Green belt, and that Bedmond be considered for insetting within the Green Belt with a defined village envelope. The review also found that Bedmond fell into an area of 'fundamental importance' and that this should be taken into consideration on any decisions regarding insetting Bedmond. As such, officers are not recommending to remove Bedmond from the Green Belt.
- 4.15 When considering whether the releasing Green Belt would fundamentally undermine the purposes of the remaining Green Belt across the plan area, the review identifies areas of the district where the Green Belt was performing a role of 'fundamental importance'. These are areas that perform a strategically important role against the Green Belt purposes across the plan area. Green Belt does not necessarily need to perform strongly against all purposes to be considered fundamentally important to the Green Belt.
- 4.16 Seven broad areas of fundamental importance have been identified where future growth should be considered carefully, to ensure that it does not fundamentally undermine the purposes of the Green Belt across the plan area.
- 4.17 Identification of an area of fundamental importance may not, however, mean that these areas cannot accommodate some development, and it is for the council to make a balanced judgement based on the scale and location of the proposed land for release.

5 Policy/Budget Reference and Implications

- 5.1 The recommendations in this report are within the council's agreed policy and budgets.

6 Financial, Legal, Staffing, Equal Opportunities, Environmental, Community Safety, Public Health, Customer Services Centre, Communications & Website, Risk Management and Health & Safety Implications

- 6.1 None specific.

7 Recommendation

- 7.1 That the Local Plan Sub-Committee agree to publish the Green Belt Review on the council's evidence base page on the website.

8 Background Papers

National Planning Policy Framework (2024)

Planning Practice Guidance (2024)

Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011)

9 **Appendices**

Appendix 1 – Green Belt Review (2025)

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