

Three Rivers District Council

Stage 4 Green Belt Review

Final Report

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1. Introduction

1.1 Study Context

Three Rivers District Council (TRDC) began reviewing its Local Plan in 2017. The new Local Plan will provide a policy framework for planning and development across the district establishing an up-to-date development strategy and strategic policies, new land allocations and updated development management policies. The new Local Plan will replace the Core Strategy (2011), Development Management Policies Local Development Document (2013) and Site Allocations Local Development Document (2014).

The Council is preparing an evidence base to inform the review of its Local Plan. The previously completed Green Belt Review¹ (GBR) studies in the district are:

- Green Belt Review – Strategic Analysis for TRDC and Watford Borough Council (2017), referenced as the Stage 1 GBR in this report.
- Stage 2 Green Belt Assessment for TRDC and Watford Borough Council (2019), referenced as the Stage 2 GBR in this report.
- Stage 3 New Settlement Analysis for TRDC (2020), referenced as the Stage 3 GBR in this report.

Since the completion of previous GBRs covering Three Rivers, there have been multiple changes to national Green Belt planning policy and guidance, including the introduction of grey belt.

The changes to national policy and guidance reflect the priority of the new Government to boost housing delivery and achieve its ambition to deliver 1.5 million homes within this parliament. There has been a significant increase in the council's local housing need over the Local Plan period to 2041 following the introduction of the new standard methodology in December 2024 and an update in March 2025. Three Rivers' current housing need, using the standard methodology, is 832 homes per year. However, the Council is tightly constrained by Green Belt and has limited urban capacity. In planning positively for growth, TRDC needs to consider what role Green Belt land will play in any future spatial strategy.

Linked to this, the revised National Planning Policy Framework (NPPF) now explicitly requires local planning authorities to review Green Belt boundaries to accommodate housing need (alongside other development needs) where such needs cannot be met through other sources of land supply. Where Green Belt land is required to meet development needs, national policy now clarifies that plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations, ensuring that such areas for development comprise sustainable locations.

In December 2024, alongside the revised NPPF, the Government also confirmed amended transitional arrangements for councils seeking to produce local plans under the current plan-making system. Authorities now have till December 2026 to submit their plans for Independent Examination. The latest Local Development Scheme for Three Rivers states the Council intends to submit its local plan for Independent Examination by September/October 2026. Given the tight timescales the council is working towards and that changes in national planning policy require the Council to re-consider spatial options to accommodate the increased development needs in full, there is a pressing need to review and update, where necessary, the existing Green Belt evidence to inform this process. This study will help provide the evidence to enable the Council to make robust decisions.

1.2 Study Purposes

Arup has been appointed by TRDC to update its Green Belt evidence in light of the updated national policy and guidance. A primary component of this review is the assessment of the previous GBRs against the new policy and guidance to assess whether they are aligned and can continue to be relied upon going forward, or whether parcels require re-assessment. As part of the review, consideration is also given to best practice as

¹ It should be noted, that a GBR can also be referred to as a Green Belt Assessment (GBA) with these terms often being used interchangeable. For this study, the term GBR will be used, but it should be noted that the previous Stage 2 Study used GBA.

documented in recent appeal decisions. The study also considers the spatial extent of the previous GBRS and whether the approach taken is proportionate.

In addition to the above, the study also incorporates the following elements:

- **Grey belt identification** following the key steps set out in the Green Belt Planning Practice Guidance (PPG).
- **Review of the previous washed over villages assessment** to consider whether any changes to the recommendations are necessary in light of new policy and guidance.
- **Analysis to support any future assessment by the Council of whether release of Green Belt would fundamentally undermine** the function of the remaining Green Belt, as required by the latest policy and guidance.

1.3 Report Structure

The report, known as the Stage 4 GBR, is structured as follows:

- Section 2 sets out a review of the recent changes to national planning policy and guidance, as well emerging conclusions from recent appeals. It concludes with the implications for this study. The full appeal reviews can be found in Appendix A.
- Section 3 provides the local Green Belt context and a summary of the approaches and key findings from the preceding GBRs.
- Section 4 provides a review of the previous GBRs to establish whether they are still fit for purpose against the updated national policy and guidance, and in light of emerging experience elsewhere.
- Section 5 considers the geographical extent of the previous GBRs and whether there is a case for carrying out further assessment for new areas.
- Section 6 provisionally identifies grey belt.
- Section 7 provides commentary on the previous washed over village assessment.
- Section 8 provides analysis to support any future fundamentally undermine test.
- Section 9 presents the conclusions and recommendations from this Stage 4 GBR.

2. Policy, guidance and recent appeals

2.1 Policy and guidance context

The purpose of a GBR is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the NPPF. Local planning authorities may then take the findings of the assessment into account alongside other evidence in making decisions about their Local Plan Strategy, site allocations / broad locations and ultimately possible alterations to Green Belt boundaries.

The previous GBRs set out the relevant national policy and guidance framework for undertaking such reviews, as well as good practice identified elsewhere. The Stage 1, 2 and 3 GBRs were respectively undertaken under the auspices of the 2012, 2018 and 2019 versions of the NPPF.

Since the previous GBRs were undertaken, the NPPF has been updated multiple times with the latest update being published in December 2024. To provide a robust and consistent approach to Green Belt review following the changes in policy, MHCLG also published updated Green Belt PPG in February 2025.

The section below therefore highlights the changes to national Green Belt policy and guidance since the preceding studies were carried out; and presents analysis of how Inspectors have been interpreting the new policy and guidance in recent planning applications. Before considering the implications for this study.

2.2 Updated National Planning Policy Framework (2024)

Although there have been some key changes in relation to Green Belt policy since the NPPF was first published in 2012, the majority of the policies in relation to Green Belt and plan-making have been retained and remain unchanged. These include:

- The fundamental aim of Green Belt policy to “*prevent urban sprawl by keeping land permanently open*” (NPPF 2024, para 142).
- The five main purposes of Green Belt (NPPF 2024, para 143):
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- The intended permanence of the Green Belt (NPPF 2024, paras 144, 145).
- Alterations to Green Belt only to be undertaken in exceptional circumstances (NPPF 2024, para 145)
- The need to take into account sustainable patterns of development (NPPF 2024, para 148)
- Boundary definition requirements (NPPF 2024, para 149)
- Considerations as to whether villages should be included or excluded from the Green Belt (NPPF 2024, para 150).
- Need for positive planning in the use of Green Belt land (NPPF 2024, para 151).

That being said, the most recently updated Green Belt policy includes a number of significant changes for plan-making relating to exceptional circumstances, grey belt and sequential release of Green Belt land.

2.2.1 Exceptional circumstances

The 2024 NPPF now requires authorities that cannot meet their identified need for homes, commercial or other development through other means to review their Green Belt boundaries: “*If that is the case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and*

propose alternations to meet these needs in full.” The review of Green Belt boundaries for this reason now constitutes grounds for Exceptional Circumstances to release Green Belt land (NPPF 2024, paragraph 146).

The new requirement to consider Green Belt land to meet housing and other requirements is mitigated at a high-level by an additional test introduced in paragraph 146, and which the Council will have to demonstrate in its Exceptional Circumstances case. The test stipulates that Green Belt boundaries should not be altered where that would “*fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan*” (NPPF 2024, paragraph 146).

2.2.2 Grey belt

The NPPF 2024 introduced a sub-category of Green Belt land called grey belt. Grey belt is 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” (NPPF 2024, glossary).

Footnote 7 identifies constraints that may preclude land from being considered as grey belt. The PPG provides further guidance on how footnote 7 should be applied when identifying land as grey belt, including that authorities should consider where areas of grey belt would be covered by or affect designations in footnote 7.

2.2.3 Sequential release of Green Belt land

NPPF 2024 paragraph 148 introduces a sequential approach to the release of Green Belt land: “*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.*” When applying this approach and the release of Green Belt is proposed, consideration still needs to be given to promoting sustainable patterns of development, in particular whether “*the site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework*” (NPPF 2024, paragraph 148). Paragraphs 110 and 115 focus on sustainable development locations and sustainable transport solutions.

2.3 Updated Planning Practice Guidance (2025)

In February 2025, the government updated the Green Belt PPG to take into account the changes made to the NPPF in December 2024. The PPG now provides guidance for plan-making on:

- how to assess Green Belt to identify grey belt within it, in particular how to assess land against the NPPF Green Belt purposes (a), (b) and (d);
- how to consider the impact of development, or of release of land on the remaining Green Belt in the plan area;
- when a proposal on grey belt land may not constitute inappropriate development in the Green Belt; and
- how to identify sustainable locations when considering release of Green Belt land.

The PPG also provides guidance on how to consider proposals on potential grey belt land for the purpose of decision-making. This summary focuses on the plan-making guidance.

2.3.1 Grey belt

The guidance makes it clear that the identification of grey belt land does not necessarily mean that the land should be allocated for development or released from the Green Belt. The contribution of the land to the Green Belt purposes needs to be considered alongside wider NPPF policies in making any decisions about Green Belt land.

GBR, and the identification of grey belt, should be part of the plan-making process, with the expectation that the identification of grey belt land will allow for the prioritisation of land detailed in paragraphs 147 and 148 of the NPPF².

2.3.2 Assessing Green Belt to identify grey belt land

Local authorities should produce a GBR in order to identify grey belt land. When updating or preparing plans, authorities will need to consider whether any existing Green Belt assessment remains up to date³.

2.3.3 Key steps to identify grey belt land

The key steps used to identify grey belt are⁴:

- Identify the location and appropriate scale of area to be assessed.
- Evaluate contribution to purposes (a), (b) and (d).
- Consider if any of footnote 7 restrictions apply.
- Identify grey belt.
- Consider whether the release of Green Belt will fundamentally undermine the five Green Belt purposes taken together across the plan area.

2.3.4 GBR spatial scope⁵

The PPG stipulates that the Green Belt should be divided into assessment areas for the purpose of identifying grey belt. The number and size of assessment areas should respond to local circumstances. The whole Green Belt should be considered in the first instance.

Assessment areas should be sufficiently granular to enable assessment of the variable contribution of the Green Belt to the purposes. A small number of large assessment areas will not be appropriate in most circumstances and to better identify grey belt, assessment areas should be further sub-divided. Finer grained assessment may be appropriate in specific locations, such as around existing settlements or public transport hubs or corridors.

2.3.5 Purpose assessment

The PPG provides explicit guidance on how to conduct a GBR to identify grey belt in relation to purposes (a), (b) and (d)⁶. It is silent on purposes c and e as they are not included within the grey belt definition.

Large built-up areas, towns and villages

The definition of towns, and large built-up areas for the purpose of assessing purposes (a), (b) and (d) has been clarified. Villages should not be included for the purpose of assessing these purposes.

² Paragraph: 001 Reference ID: 64-001-20250225

³ Paragraph: 002 Reference ID: 64-002-20250225

⁴ Paragraph: 003 Reference ID: 64-003-20250225

⁵ Paragraph: 004 Reference ID: 64-004-20250225

⁶ Paragraph: 005 Reference ID: 64-005-20250225

To check the unrestricted sprawl of large built-up areas (purpose a)

The PPG sets out illustrative factors that should be considered when assessing performance against purpose a:

- Adjacency to large built-up area(s).
- Extent of existing development in assessment area and impact of other urbanising influences.
- Presence, or otherwise, of physical feature(s) in reasonable proximity that could restrict and contain development.
- Shape of development if released, with degree of enclosure and incongruous patterns of development considered.

To prevent neighbouring towns merging into one another (purpose b)

The PPG sets out illustrative factors that should be considered when assessing performance against purpose b:

- Location of assessment area in relation to defined towns.
- Extent of existing development in assessment area.
- Scale to which the assessment area forms part of the gap between towns.
- Degree to which the development of the assessment area would result in loss of visual separation of towns, including whether there are any physical or natural features that might preserve visual separation.

To preserve the setting and special character of historic towns (purpose d)

The PPG notes that if there are no historic towns, a detailed assessment may not be necessary. It sets out illustrative factors that should be considered when assessing performance against purpose d:

- Extent of existing development in assessment area.
- Role that the assessment area plays in the setting of the historic town.
- Contribution that the assessment area makes to the special character of the historic town. This should consider physical, visual and experiential links between the assessment area and the historic aspects of the town.
- Degree of separation of assessment area from the historic aspects of the town by existing development or topography.

2.3.6 Application of footnote 7

The grey belt definition excludes land where the constraints identified in NPPF footnote 7 would provide a strong reason for refusing or restricting development. Designations listed as effective constraints in footnote 7 include: habitat sites, Sites of Special Scientific Interest (SSSI); Local Green Space, National Landscapes, National Parks or Heritage Coasts; irreplaceable habitats; designated heritage assets; and areas that are at risk of flooding or coastal change.

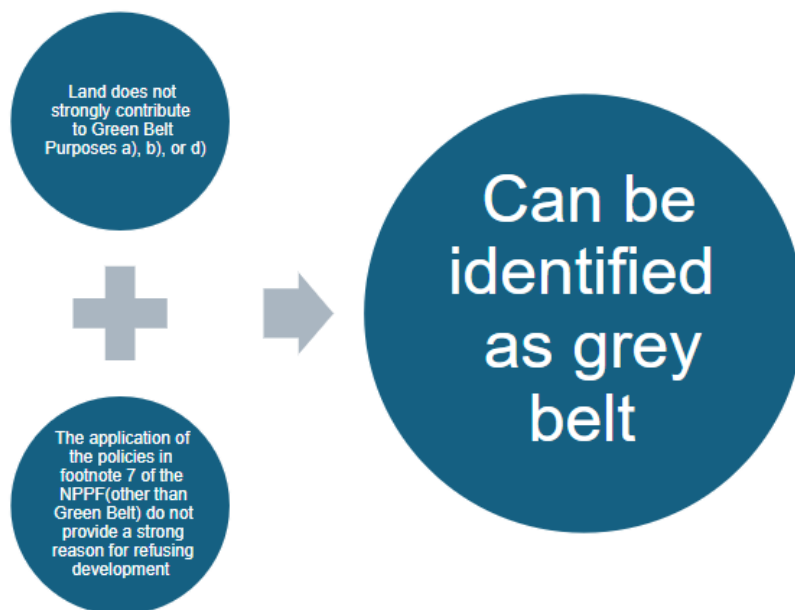
The PPG makes it clear that authorities need to consider not only areas where grey belt would be covered by these designations but also whether it would affect these definitions. Where these constraints are present within a local authority area, it is likely to only be possible to provisionally identify such land as grey belt in advance of more detailed specified proposals and impact assessment⁷.

⁷ Paragraph: 006 Reference ID: 64-006-20250225

2.3.7 Assessing whether land is grey belt

Green Belt land judged not to strongly contribute to any one of the purposes (a), (b) and (d) can be provisionally identified as grey belt, subject to the footnote 7 exclusions (Figure 1).

Figure 1 When can land be identified as grey belt?



Source: MHCLG (2025) <https://www.gov.uk/guidance/green-belt>, Paragraph: 007 Reference ID: 64-007-20250225

2.3.8 Assessing the impact of Green Belt release on the remaining Green Belt in the plan area

The PPG provides guidance of the application of the new NPPF test which of: “*whether the release of Green Belt land would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.*” (NPPF 2024, paragraph 146). The PPG explains 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.*”⁸

2.3.9 Identifying sustainable locations

The PPG highlights that when reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a location is appropriate for development. Where grey belt land is not in a location that is or can be made sustainable, then development of that land is inappropriate. The PPG elaborates that the definition of sustainable locations should be determined for the local context, taking into account opportunities to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115⁹.

2.4 Review of recent appeal decisions

As the NPPF (2024) and Green Belt PPG (2025) have only relatively recently been published, they have yet to be tested at any Local Plan examinations. Therefore, it is helpful to look at recent planning appeals to see how they are being interpreted with respect to decision making to identify any relevant lessons learnt that can be applied to plan-making.

Before looking at recent appeals, it is helpful to reflect on more historic appeals, which have established some key points in relation to openness that are still considered relevant for GBA.

⁸ Paragraph: 008 Reference ID: 64-008-20250225

⁹ Paragraph: 011 Reference ID: 64-011-20250225

- Openness is generally considered to be ‘land free from built development’, which should be assessed on an individual area basis as well as in terms of the cumulative impact on adjacent areas.¹⁰
- Openness should be considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’ (for example, visual linkages between settlements in relation to purpose b, or functional character and linkages to the wider Green Belt in relation to purpose (c)).¹¹
- While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, is not a mandatory determinative factor of openness.¹²

Following a review of around 50 planning appeals that have been determined since the publication of the NPPF / PPG and which featured Green Belt as a main issue, a number of key lessons have been identified:

- A site may be grey belt but if it is not in a sustainable location, its development would be inappropriate in the Green Belt.
- ‘Sustainable location’ can be defined in relation to distance from facilities and services, and access to public transport options rather than reliance on private vehicles.
- The definition of ‘large built-up-areas’ and ‘towns’ within purposes assessments is significant and should align with how these places are defined within the development plan. There must be no ambiguity as to whether places are villages or towns. The definition of settlements in a settlement hierarchy has significant weight when determining what constitutes a town for Green Belt purposes. However, the primary factors influencing whether a settlement is a village or a town (and those that should be considered in the settlement hierarchy) are the extent of its services and facilities and the scale of the settlement.
- The footnote 7 designation does not automatically mean that a site fails the grey belt test; there needs to be a strong reason for refusal
- Looking at parcels within a GBR is helpful at a strategic level for plan-making. However, when considering the identification of grey belt in decision making, 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.
- Purpose (a) is concerned with sprawl in relation to large built-up-areas only. The fact that a development would create ribbon development is not relevant to the assessment of purpose (a).
- The proportional loss of Green Belt should be considered in relation to the totality of the Green Belt within a local authority. If the proportional loss is deemed small, it would not fundamentally undermine the Green Belt purposes, taken together.
- A parcel (or site) needs to have a wider strategic role within the functioning of the Green Belt; otherwise it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the development plan area. .

Appendix 1 sets out in greater detail the most significant and salient decisions from the reviewed appeals.

¹⁰ The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

¹¹ See: Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin).

¹² Further information available here: <https://www.supremecourt.uk/cases/uksc-2018-0077.html>

2.5 Implications for this study

- **National policy consistency:** Much of national Green Belt policy remains unchanged, therefore broad approaches within the GBR studies are likely to remain valid. Green Belt policy has remained consistent in relation to fundamental aim, purposes, permanence, requirement to demonstrate exceptional circumstances before making changes, sustainable patterns of development, washed over village definition and positive planning within the Green Belt. Rather, the focus of the review of existing Green Belt evidence should be on the detailed points of difference in national policy in relation to grey belt, exceptional circumstances and sequential release of Green Belt land, insofar as they are relevant to the scope of a GBR.
- **Geographic scope:** As well as review of the performance of the whole of the Green Belt within the Three Rivers District; there needs to be subsequent assessment at a sufficiently granular scale to enable the assessment of variable contribution to the Green Belt purposes, to inform the identification of grey belt. This should be considered within the review of the existing studies.
- **Purposes:** Given the need to identify whether Green Belt release will fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan as part of the development of the exceptional circumstances case, it is necessary for the assessment of performance to cover all of the purposes (a-e). This should be considered within the review of the existing studies.
- **Interpretation of purposes (a), (b) and (d):** The existing studies need to be reviewed to establish whether appropriate criteria have been adopted for purposes (a), (b) and (d), reflecting the illustrative factors identified in the PPG.
- **Definition of large built-up-areas and towns:** The existing studies need to be reviewed to check whether the definitions of large built-up areas, neighbouring towns and historic towns used for the assessment of purposes (a), (b) and (d) respectively, are aligned with the new guidance, and in particular are not villages. There should be no ambiguity in the definition, and it should align with the definitions adopted within the development plan. The adopted definitions should align with the settlement hierarchy for the District.
- **Grey belt identification:** Grey belt needs to be provisionally identified within the GBR as part of plan-making following the process set out in the PPG. However, not all grey belt will necessarily be allocated for development or released from the Green Belt. It will be for the Council to decide the extent to which this takes place in considering the balance of planning factors as part of the wider plan-making process.
- **Provisional grey belt identification:** When identifying grey belt, the area of search should be focused on sustainable locations in line with NPPF para 155c. Within sustainable locations, the identification of grey belt will be based on the performance scores for NPPF purposes (a), (b) and (d). A GBR can only provisionally identify grey belt due to the need for further assessment at a later stage of the plan-making process to identify any effects on footnote 7 designations. This will confirm grey belt status or otherwise.
- **Sequential release of Green Belt:** Following the provisional identification of grey belt, if a Previously Developed Land (PDL) dataset is available, or this status is established through site selection assessments, it is possible to categorise grey belt into PDL and non-PDL grey belt (which will assist in the application of NPPF paragraph 148, if necessary). However, if a pre-existing data set is not available, then this needs to be considered as part of the Council's wider work on site selection.
- **Exceptional circumstances:** A review of Green Belt boundaries is a mandatory component of plan-making preparation if development need cannot be met on non-Green Belt land. Further meeting development need has been identified as explicit grounds for Exceptional Circumstance to release Green Belt land. A new 'fundamentally undermine' test has been introduced, which will need to be set out as part of any Exceptional Circumstance case. Although the development of such a case lies outside the scope of this study, the outputs of this study should be used to inform it. When considering the 'fundamentally undermine' test, considering the proportional loss of total Green Belt within the District and whether the Green Belt land has a wider strategic role within the functioning of the Green Belt. can also be helpful. Green Belt does not necessarily need to perform strongly against *all* purposes to be considered fundamentally important to the Green Belt.

3. Local Green Belt context

This section provides the local Green Belt context. It also sets out the preceding Green Belt work including a summary of the approach to the Stage 1 GBR, Stage 2 GBA and Stage 3 New Settlement Analysis.

3.1 Three Rivers Green Belt

The Three Rivers Green Belt is part of the Metropolitan Green Belt with the Green Belt covering almost 80% of the District. The areas not covered by Green Belt designation are predominantly the built-up urban settlements (e.g. towns or large villages) but there are also smaller washed over villages.

The character of the Green Belt varies across the district and reflects an area of transition from a more fragmented pattern on urban fringe land around the London Boroughs to wider open countryside.

3.2 Stage 1 GBR (2017)

3.2.1 Study purpose

A Stage 1 Green Belt Review¹³ was prepared on behalf of TRDC and Watford Borough Council (WBC and published in August 2017. The main purposes of the study were:

- A strategic review of the Green Belt and the extent to which the Green Belt meets and contributes to the five purposes set out in the NPPF.
- Explore the character and role of villages washed over by the Green Belt and whether any warranted being removed from the Green Belt, i.e. in-setting.

3.2.2 Approach

The study assessed the entire extent of the Green Belt within TRDC and WBC boundaries.

The Green Belt was divided into 83 parcels ('strategic land parcels') which were defined using well-defined physical features, principally using the road network. The strategic land parcels were then assessed against criteria for each of the five Green Belt purposes as set out in the 2012 NPPF. The study also considered a local Green Belt purpose 'preserving the setting and character of villages and other settlements', however this did not feed into the overall contribution assessment, which as restricted to the five national Green Belt purposes.

The parcels were rated as making a Limited Contribution, Contribution or Significant Contribution to each of the purposes before this being combined in an overall assessment reflecting professional judgement (with there being no weighting applied). Within the assessments five key elements were considered:

- Existing land use;
- Proximity and relation 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.

In addition to assessing the performance of the Green Belt as a whole, the review also considered the case for in-setting settlements within the Green Belt in the Three Rivers District.

¹³ Amec Foster Wheeler (2017) Green Belt Review Strategic Analysis

3.2.3 Green Belt purposes definitions and assessment criteria

The study set out definitions for key terms within the five Green Belt purposes (Figure 2) and established criteria that were used to assess the contribution that parcels made to the Green Belt purposes (Figure 3).

Figure 2 Stage 1 GBR Definitions of Key Terms

Green Belt Purpose	Definition of Terms applied in the Review
To check the unrestricted sprawl of large built-up areas	<p>Sprawl – spread out over a large area in an untidy or irregular way (Oxford Dictionary online). This includes Ribbon development which is development along a main road, especially one leading out of a town or village (Oxford Dictionary Online). This includes historical patterns of, or current pressures for, the spread of all forms of development along movement corridors, particularly major roads.</p> <p>Large built-up areas – in the context of this study these are Rickmansworth, Chorleywood, Northwood (part), Croxley Green and Watford within the study authorities, but also Hemel Hempstead, Bushey and Northwood/Pinner.</p>
To prevent neighbouring towns from merging	<p>Neighbouring towns – this relates to the strategic relationship between 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.</p> <p>Merger/Coalescence – the physical or visual linking of two settlements or areas of built form</p>
To assist in safeguarding the countryside from encroachment	<p>Encroachment– a gradual advance beyond usual or acceptable limits (Oxford Dictionary online).</p> <p>The countryside – open land with an absence of built development and urbanising influences, and characterised by rural land uses including agriculture and forestry.</p> <p>Openness – absence of built development or other urbanising elements (i.e. not openness in a landscape character sense which concerns topography and woodland / hedgerow cover).</p>
To preserve the setting and special character of historic towns	<p>Historic town – interpreted to be a settlement or place with historic features identified in local policy or through Conservation Area designation. Note, there are no historic towns within, or adjacent to, the study area. This purpose is therefore applied in a local context using Conservation Area designation as the reference point.</p>
To assist in urban regeneration by encouraging the recycling of derelict and other urban land.	<p>Where development in the open countryside is likely to render previously developed land a particular vicinity less attractive to develop.</p>

Source: Amec Wheeler Foster (2017) Green Belt Review – Strategic Analysis

Figure 3 Stage 1 GBR Assessment Criteria

Topic	Criteria
NPPF Purposes of the Green Belt	
To check the unrestricted sprawl of large built up areas	<p>Prevent the sprawl of a built-up area into open land where development would not otherwise be restricted by a permanent boundary.</p> <p>What is the role of the parcel in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</p>
To prevent neighbouring towns from merging into one another	<p>Prevent development which would result in the merger or erosion of a gap (physically or visually) between settlements.</p> <p>What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?</p>
To assist in safeguarding the countryside from encroachment	<p>Protect the openness of the countryside and its perceived rurality.</p> <p>What is the role of the parcel in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</p>
To preserve the setting and special character of historic towns	<p>Preserve the setting and character of historic town.</p> <p>What is the role of the parcel in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</p>
To assist in urban regeneration by encouraging the recycling of derelict and other urban land	<p>Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically?</p>
Overall Assessment of Contribution to Green Belt Purposes	<p>In light of the assessment of individual purposes, what is the overall contribution of the parcel to the Green Belt, both individually and in a wider context?</p>
Local Role of the Green Belt	
Preserving the setting and character of villages and other settlements	<p>What is the relationship between a village or hamlet and the surrounding Green Belt?</p>
Opportunities to Promote Positive Use of the Green Belt	
Current public access and opportunities to provide access/recreation	<p>What is the degree of existing public access and/or provision of recreational facilities?</p>
Enhancing landscapes and visual amenity	<p>Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?</p>
Enhancing biodiversity	<p>Are there any national or local biodiversity designations within the parcel?</p>
Improving derelict and damaged land	<p>Is there any derelict land in the parcel?</p>

Source: Amec Wheeler Foster (2017) Green Belt Review – Strategic Analysis

3.2.4 Washed over village assessment – approach

The case for in-setting of settlements within the TRDC Green Belt was considered, with the villages of Heronsgate, Sarratt and Bedmond being assessed. The settlements were reviewed in the context of NPPF 2012 paragraphs 84, 86 and 89(5) relating to sustainable patterns of development, washed over villages and limited infilling respectively (now NPPF 2024 paragraphs 148, 150 and 154 (e)).

The settlements were reviewed against the following criteria (Figure 4).

Figure 4 Stage 1 GBA washed over village assessment criteria

▶ General character – location and overall setting, topography, settlement form, building type/age, overall sensitivity, sense of identity/unity/cohesion, key focal points, Conservation Area(s).
▶ Density and layout of buildings – degree of spaciousness/enclosure, opportunities for infill.
▶ Presence and character of open space – location and relationship with settlement.
▶ Interface with the surrounding landscape – settlement depth, rear garden character, glimpsed/panoramic views to the wider landscape, connectivity with landscape context.

Source: Amec Wheeler Foster (2017) Green Belt Review – Strategic Analysis

3.3 Stage 2 GBA (2019)

3.3.1 Study purpose

A Stage 2 Green Belt Assessment¹⁴ was prepared on behalf of TRDC and WBC and was published in October 2019. The main purpose of the study was to consider the extent to which the release of different areas of land would reduce 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. The study did not assess the cumulative impact of the release of multiple parcels on the Green Belt as a whole, as this was outside the scope the study due the various permutations that could be considered.

3.3.2 Approach

The study assessed all of the land adjacent to the urban edges of inset settlements within and bordering Three Rivers and Watford and the village of Bedmond.

To determine the extent of the assessment area and subdivision of parcels, analysis was undertaken by extending outwards from inset edges to capture the variations in contribution to the Green Belt purpose. When a boundary feature was reached beyond which release of land was considered to increase in harm level, a new parcel was established. At the point it was judged release of land would result in high or very high harm, no further parcel subdivision was undertaken. The study utilised the parcels identified in the Stage 1 study, with these being divided as necessary into Stage 2 parcels that reflected assessed variations in harm to the Green Belt purposes.

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.

The identified parcels for consideration in Stage 2 were overlaid with a set of major policy constraints (i.e. Scheduled Monuments; Registered Parks and Gardens; Sites of Special Scientific Interest; Local Nature Reserves; Ancient Woodland; Common land; and Flood Zone 3b.). Land subject to these constraints was excluded from assessment, resulting in 144 parcels for assessment within Three Rivers.

¹⁴ LUC (2019) Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough Final Report

Once the assessment parcels were established, the study assessment followed 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.

The local Green Belt purpose ‘preserving the setting and character of villages and other settlements’ previously used in the Stage 1 GBR was not brought for this assessment, on the basis that no weight can be attributed to this purpose.

The overall assessment of harm to the Green Belt was rated using a seven-point scale ranging from very high to very low harm.

3.3.3 Green Belt purpose definitions and assessment criteria

In assessing all of the Green Belt purposes consideration was given to ‘openness’ of the land given its role as an essential characteristic of Green Belt. This was considered from spatial and visual perspectives. The other essential characteristic of Green Belt ‘permanence’ was also considered in relation to benefits of retaining or establishing clearly defined, readily recognisable and likely to be permanent boundaries.

Purpose (a) To check the unrestricted sprawl of large built-up areas

The Stage 2 GBR explored different definitions of sprawl, and set out that irrespective of the definition, the intent is that planned development cannot contravene this purpose. Further that given that the form of future development is unknown, the key issue in terms of the role that the land will play in contributing to this purpose is its relationship with the large built-up area.

In terms of defining the large built-up areas, the Stage 2 GBR remained consistent with the Stage 1 GBR – identifying Rickmansworth, Chorleywood, Northwood, Croxley Green, Watford, Hemel Hempstead and Bushey. However, it also expanded the list of areas considered, noting ‘*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.*’

The assessment explored:

- Extent and nature of existing development, with built structures having an impact on openness or an urbanising influence. This excluded development classed as appropriate or not inappropriate development in the Green Belt;
- Extent of urban containment; and
- Relationship with existing large built-up areas, to contribute the land must lie adjacent to or in close proximity to a large built-up area and retain a degree of openness.

Purpose (b) To prevent neighbouring towns from merging

The Stage 2 GBR explored the concept of towns, acknowledging that what constitutes a town is widely interpreted in GBRs. It further noted that regardless of whether a town is large enough to be considered a town, smaller settlements that lie between larger ones can have an impact on the separation between larger towns.

In considering the assessment of ‘merging’, the study acknowledged that the role that land plays in preventing merging is more than the product of the size of the gap between them, and that assessment needs to consider both the physical and visual roles that land plays preventing the merging of settlements.

In the Stage 1 GBR, the neighbouring towns identified were Rickmansworth, Watford, Hemel Hempstead, St Albans, Northwood, Pinner, Bushey and Radlett. The Stage 2 GBR, at paragraph 3.57, suggests that although not listed within the defined purpose (b) towns in the Stage 1 GBR, it appeared that gaps associated with the smaller settlements of Chorley wood, Maple Cross and Abbots Langley were also taken in consideration in the assessments themselves.

The Stage 2 GBR considered all of the above-named areas and further expanded the list to include Amersham and Chalfont St Peter/ Gerrards Cross.

The assessment explored:

- Relationship with towns, in terms of physical proximity;
- Degree of openness and extent of existing development;
- Relationship with urban area versus the countryside, including the extent of containment of development, dominance of development with an adjacent area or containment by physical landscape elements; and
- Presence of built and natural landscape elements that can increase or decrease perceived separation.

Purpose (c) To assist in safeguarding the countryside from encroachment

The Stage 2 GBR assessment for this purpose, took into account:

- Impact of existing washed over development;
- Impact of inset development;
- Potential for boundaries to limit harm to the wider countryside;
- Nature of any development and whether it could be considered ‘appropriate development’ and the extent to which the different land uses are considered urbanising;
- Extent to which land displays characteristics of countryside, i.e. an absence of built or urbanising influences, physical relationship with adjacent settlement and wider countryside, and its containment;
- Presence of physical landscape elements that influence the relationship between settlement and adjacent countryside.

Purpose (d) To preserve the setting and special character of historic towns

The Stage 1 GBR, noted that there were no historic towns within or adjacent to the study area but considered this purpose in relation to designated Conservation Areas to reflect the local context. The Stage 2 study took a slightly different approach suggesting, at paragraph 3.87, that the local context applied in Stage 1 i.e. assessing in relation to Conservation Areas, was more appropriately considered as part of landscape or cultural heritage sensitivity assessments. On this basis and given that no historic towns were identified of relevance to this purpose, no assessment of this purpose was undertaken.

Purpose (e) To assist in the urban regeneration by encouraging the recycling of derelict and other urban land

The Stage 2 GBR set out its methodology that it is the extent to which brownfield land is used to meet development needs that is of primary relevance when judging the extent to which Green Belt land serves this purpose. It went on further to state that although in theory the extent to which Green Belt land, if released, would be capable of redirecting development away from brownfield sites would vary spatially, there was no evidence of this locally. It therefore concluded within the methodology that the contribution across the whole district was limited, and no further detailed assessment was undertaken in relation to purpose (e).

3.4 Stage 3 New Settlement Analysis (2020)

3.4.1 Purpose

A Stage 3 New Settlement Analysis Study¹⁵ was prepared on behalf of TRDC and published in January 2020. The main purpose of the study was to identify the variations in harm to the Green Belt purposes that would result from the creation of a new inset settlement, distinct from any existing inset areas.

¹⁵ LUC (2020) Three Rivers District Council Green Belt Study, Stage 3: New Settlement Analysis

3.4.2 Approach and key findings

The Stage 3 study follows a similar approach to the Stage 2 study, by considering potential harm to the Green Belt purposes, considering the contribution made to the Green Belt purposes for the land that would be released and the impact this would have on the contribution made by adjacent Green Belt land.

This assessment only considered land for a new settlement contained entirely within the Three Rivers District. The Council specified that a new settlement would need to accommodate a minimum of 3,000 dwellings with associated community and education facilities, at a minimum development density of 40 dwellings per hectare. This was approximated to the need for at least 100 hectares as an indicative minimum size.

The study assessment followed two steps:

- Step 1 – identification of search areas
- Step 2 – assessment of harm to Green Belt purposes

To identify search areas, the following considerations were applied:

- At least 100 hectares of developable area
- At least 250m minimum distance between existing inset areas
- Any substantial areas of existing development, for example. villages or hamlets, were not taken into account when considering the extent of area available for development, however smaller clusters of houses or individual dwellings were not deducted from the areas analysed.
- Any area which had designations that would be considered an ‘absolute’ constraint to development were excluded from area calculations.
- New settlement should not be subdivided by either a motorway or the forthcoming HS2 rail line, as this would result in the creation of two separate smaller communities.

Seven search areas were identified (Step 1). These were assessed on their contribution to the Green Belt purposes and their impact on the contribution of adjacent Green Belt land, following a similar assessment process as per the Stage 2 GBR (Step 2).

The study concluded that the release of 100 hectares of land in any of the search areas would result in at least high harm to the Green Belt purposes.

A high-level summary for each of the seven search areas is provided below.

- Release of any 100 hectares in search areas 1 (land south of Chorleywood), 2 (land south of Batchworth and west of Northwood), and 6 (land to north east of Abbots Langley and Watford) would result in very high harm.
- For search areas 3 (land to the north of Croxley Green and south of the M25), 5 (land between Kings Langley and Bedmond) and 7 (land to west of Abbots Langley and Watford) areas of high harm of varying sizes was identified for each.
- For search area 4 (land around Sarratt) two distinct areas of high harm were identified, of 160 and 320 hectares. The smaller of the two areas would have less impact on the perceived separation of towns.

4. Review of previous studies

This section sets out our review of the previous GBRs to establish whether they are still fit for purpose against the updated national Green Belt policy and guidance.

4.1 National policy consistency

Much of national Green Belt policy remains unchanged and therefore broad approaches within the previous GBRs for TRDC are considered to still be valid. Green Belt policy has remained consistent in relation to the fundamental aim (openness), purposes and permanence which were key principles underpinning the previous assessments.

4.2 Geographic scope

The PPG stipulates that the whole Green Belt should be considered in the first instance. The Stage 1 GBR provides an overview of the performance of the Green Belt for the whole district.

The PPG goes on to say that assessments should be sufficiently granular to enable assessment of the variable contribution of the Green Belt to the purposes. Therefore, a small number of large assessment areas would not be appropriate. Authorities should consider where it may be appropriate to vary the size of assessment areas based on local circumstances. The approach taken in the Stage 2 and Stage 3 GBR is consistent with this guidance, having assessed parcels at a sufficient level of granularity, with significant sub-division of parcels used in Stage 1.

The geographic scope of the studies is considered to still be robust and aligned with new national policy and guidance.

4.3 Green Belt purposes

4.3.1 NPPF Green Belt purposes

The five main purposes of Green Belt have been retained and continue to form the basis of Green Belt assessments (NPPF 2024, para 143). The GBR studies have used these purposes as the basis of their assessment, as is considered appropriate.

Given the new need for grey belt to be identified and its definition within the NPPF, GBRs must include performance scores for Green Belt purposes (a), (b) and (d). The GBR studies have considered these three purposes. Although the Stage 2 GBR does not explicitly include purpose (d) within the individual parcel assessment proformas, the methodology explores this purpose concluding it does not apply within district. It can thus be assumed that all land makes no contribution to this purpose.

Given the new need to identify whether Green Belt release will fundamentally undermine the purposes (taken together) of the remaining Green Belt when considered across the area of the plan as part of the development of the exceptional circumstances case, it is necessary for the assessment of performance within GBRs to cover all of the purposes (a-e)

The Stage 1 GBR carried out assessments against all five purposes of the NPPF, so the scope of the purpose assessment is appropriate for use in future analysis in relation to the fundamentally undermine test. The Stage 2 GBR carried out assessments against three of the five purposes (a), (b) and (c); however, as set out above, it also considered purposes (d) and (e) within the methodology and respectively concluded no contribution and limited contribution across all parcels for these purposes.

Again, the scope of analysis undertaken for the purposes is considered to be robust and aligned the new national policy and guidance.

4.3.2 Interpretation of purposes (a), (b) and (d)

The latest PPG now states that when making judgements as to whether land is grey belt (see 4.5, below) their contribution to purposes (a), (b) and (d) needs to be considered. It has therefore provided new guidance for

those making judgments against these three purposes. It lists illustrative features to be considered when making these judgments.

When identifying grey belt within Three Rivers, it is the Stage 2 GBR that is of relevance. In comparing the illustrative features for assessment set out in the PPG (see Section 2.35) to the approach taken in the Stage 2 GBR (see Section 3.3.3), it is judged that they are aligned. Thus, on this aspect, the Stage 2 GBR would be an appropriate basis for the identification of grey belt land.

To illustrate the degree of alignment between the guidance and the study, Table 1, makes a comparison between those illustrative features provided in the PPG for land making a ‘strong contribution’ against (a), (b) and (d) and the approach and features used in the Stage 2 GBA 2019 study to judge a ‘significant’ or ‘relatively significant’ impact against those same purposes. The table illustrates that the approaches are, ultimately, aligned.

Table 1 Comparison of PPG’s illustrative features to approach taken in the Stage 2 GBA 2019 study

Purpose	PPG – Strong contribution	Stage 2 – Significant or relatively significant impact
(a)	<p>Assessment areas that contribute strongly are likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development.</p> <p>They are also likely to include all of the following features:</p> <ul style="list-style-type: none"> - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt) 	<p>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.</p> <p>/</p> <p>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.</p>
(b)	<p>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns 	<p>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.</p> <p>/</p> <p>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.</p>
(d)	<p>Assessment areas that contribute strongly are likely to be free of existing development and to include all of the following features:</p> <ul style="list-style-type: none"> - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town 	<p>The Stage 2 study did not identify any historic towns which could be considered relevant in the assessment of this Green Belt purpose.</p>

4.4 Definition of large built-up areas and towns

The NPPF 2024 still does not define large built-up areas or towns, however the latest PPG clarified that the NPPF’s purposes (a), (b) and (d) do not relate to villages. In order to assess NPPF purpose performance, these places must be defined within GBRs. As set out in Section 2.4, the definition of large built-up areas and towns has been subject to significant scrutiny in recent appeals following the publication of the new PPG. It is therefore important that confidence can be placed on the definitions adopted in the studies, if Green Belt evidence is to be judged robust.

The Stage 1 and Stage 2 GBRs adopted similar but not completely identical approaches to the definitions of large built-up areas and towns within the assessments of purposes (a) and (b) (Table 2). Both studies stated that there were no historic towns in relation to purpose (d).

Table 2 Defined large built-up areas and towns in Stage 1 and Stage 2 GBR

Note: Italicised settlements appeared only in the Stage 2 GBR

District	Purpose (a)- large built-up areas	Purpose (b) – towns
Three Rivers	Rickmansworth Chorleywood Croxley Green <i>Loudwater</i> <i>South Oxhey</i>	Rickmansworth Chorleywood Croxley Green Abbots Langley Maple Cross
Watford	Watford	Watford
Dacorum	Hemel Hempstead	Hemel Hempstead
Hertsmere	Bushey	Bushey Radlett
St Albans		St Albans
Buckinghamshire		<i>Amersham</i> <i>Chalfont St Peter/ Gerrards Cross</i>
London Borough of Hillingdon	Northwood (part)	Northwood
London Borough of Harrow		Pinner

The ONS provides a series of statistics for built-up areas and provides a useful classification of settlements based on population sizes (Figure 5). The advantage of using this data source is that it allows consistent comparison / categorisation of places across England. However, it should be noted that the classification is not completely clear cut in terms of using this as a definitive source to define large built-up urban areas and towns with GBRs, as for example, larger village and small towns are grouped together and some of the geographical units used within the statistics do not align with how places are viewed within settlement hierarchies or with respect to administrative boundaries. For example, ONS statistics group Kings Langley and Abbots Langley together, which are identified as separate places in the settlement hierarchy. Nevertheless, the ONS statistics provide a useful starting point for defining large built-up areas and towns, which can be further refined with reference to published settlement hierarchies for districts and boroughs.

Figure 5 ONS built-up area size classification

Population range (Usual resident population)	BUA size classification	Approximate settlement type
0-4,999	minor	hamlet or village
5,000-19,999	small	larger village / small town
20,000-74,999	medium	medium towns
75,000-199,999	large	large towns / smaller cities
200,000+	major	cities

Source: [Towns and cities, characteristics of built-up areas, England and Wales - Office for National Statistics](#), accessed 09/05/2024

As can be seen in Table 3, around half of the settlements assessed within the GBRs fall within medium towns / built-up areas category, or larger. Ambiguity still lies with regards to Chorleywood, Abbots Langley, Radlett, Amersham and Chalfont St Peter / Gerrards Cross as to whether they are larger villages or small towns.

Table 3 Classification of GBR settlements by ONS built-up area size statistics

BUA Size Classification	Settlement Type	Settlements
Major	Cities	London (including Northwood and Pinner)
Large	Large towns / smaller cities	Watford (including South Oxhey) Hemel Hempstead St Albans
Medium	Medium towns	Rickmansworth (including Croxley Green) Bushey
Small	Larger village / small town	Chorleywood (including Loudwater) Kings Langley and Abbots Langley Radlett Amersham Chalfont St Peter / Gerrards Cross
Minor	Hamlet / village	n/a

Source: [Towns and cities, characteristics of built-up areas, England and Wales - Office for National Statistics](#), accessed 09/05/2024

Note: Maple Cross does not appear as an identified location within these statistics

Turning to adopted Local Plans and settlement hierarchies for emerging Local Plans to consider this issue further. The adopted Three Rivers settlement hierarchy¹⁶ is as follows (Table 4). All of the settlements identified as large built-up areas or towns with the GBRs are either a principal town, key centre or secondary centre. Crucially none of the settlements are identified as villages within the settlement hierarchy, which is the key exclusion as set out in the PPG.

Table 4 Three Rivers Settlement Hierarchy

Settlement Type	Settlements
Principal Town	Rickmansworth
Key Centres	South Oxhey, Croxley Green, Abbots Langley, Chorleywood, Leavesden and Garston, Mill End
Secondary Centres	Kings Langley, Carpenders Park, Eastbury, Oxhey Hall, Maple Cross, Moor Park
Villages	Bedmond, Sarratt

Now considering each of the settlements within the neighbouring authorities:

- Northwood (Hillingdon) and Pinner (Harrow) both lie within the London built-up area.
- Watford is classed as a town within Watford's adopted Local Plan¹⁷.
- Hemel Hempstead is listed as a town in Dacorum's settlement hierarchy¹⁸.
- Bushey and Radlett are respectively identified as Tier II and Tier III key settlements in Hertsmere's settlement hierarchy¹⁹. This is assumed to be equivalent to towns as Tiers IV-VII are specifically identified as key or other villages.
- St Albans is categorised as a city/ large town in St Albans' settlement hierarchy²⁰.
- Amersham is referred to as a town and Chalfont St Peter is referred to as a village in the Chiltern District Local Plan (the former district area now superseded by Buckinghamshire Council)²¹.

¹⁶ Three Rivers District Council (2011) Local Development Framework Core Strategy

¹⁷ Watford Borough Council (2022) A Sustainable Town Watford Local Plan 2021-2038

¹⁸ Dacorum Borough Council (2017) Settlement Hierarchy Study

¹⁹ Hertsmere Borough Council (date unknown) Planning for Growth, Settlement hierarchy and Accessibility Mapping Analysis

²⁰ St Albans City and District Council (2023) Settlement Hierarchy Study Part 1 Baseline; St Albans City and District Council (2023) Settlement Hierarchy Study Part 2

²¹ Chiltern District Council (2011), Chiltern District Local Plan

- Gerrards Cross is referred to as a town in the South Bucks District Local Plan (the former district area now superseded by Buckinghamshire Council)²².

The majority of the GBR assessed settlements are classed as a town in their respective local authorities. Only Chalfont St Peter is identified as a village, and the Three Rivers settlement hierarchy did not classify Loudwater as a location due to its poor sustainability assessment.

Summary

As presented above, the majority of settlements assessed in the GBR have been confirmed as towns within the ONS statistics and / or adopted Local Plans or Settlement Hierarchies. Where smaller scale settlements have been considered in the GBRs, this has been in the context that settlements are close enough together to be contiguous with larger settlements and considered as one functional urban area, i.e. Chorleywood with Loudwater, Watford with South Oxhey, and Gerrards Cross with Chalfont St. Peter, rather than considered as standalone settlements. In this context, it is therefore judged that the previous studies align with the updated guidance in the PPG and do not consider villages per se for any of the purpose assessments.

4.5 Grey belt identification

Grey belt is a newly introduced element of Green Belt reviews. It has not been considered in any previous reviews and therefore needs to be identified through this review.

The latest Green Belt PPG has provided guidance on making judgements on the three purposes that define grey belt identification – purposes (a), (b) and (d). As stated above in section 4.4, the new guidance on how to make judgements against these purposes aligns well with the approach taken in the Stage 2 GBA study against those purposes. Outcomes of assessments conducted in the Stage 2 GBA can, therefore, be used in this study when conducting grey belt identification.

4.6 Fundamentally undermine assessment

The latest revision to the NPPF requires that authorities altering their Green Belt boundaries, where exceptional circumstances exist to do so, must be able to show that doing so would not ‘fundamentally undermine’ the purposes taken together of remaining Green Belt land, looking across the whole extent of their Green Belt allocation. As the fundamentally undermine test has only recently been introduced it was not considered in any of the previous GBRs. As set out in section 2.5, this will need to be explored as part of any Exceptional Circumstances case.

4.7 Implications for this study

The review for the Stage 1, 2 and 3 GBRs has demonstrated that the approaches taken in these studies are aligned with new national policy and guidance for Green Belt and can continue to be relied upon.

The focus for this study, and wider work being undertaken by the Council, should therefore be on delivering newly introduced elements of Green Belt Review that did not form part of the original studies, i.e. the identification of grey belt and consideration of whether the release of Green Belt would fundamentally undermine the Green Belt purposes taken together. Additionally, this new study should consider whether any new areas of Green Belt need to be subject to assessment as a result of the changes in policy or guidance or as a result of new potential growth locations being identified through new Call for Sites. This final aspect is explored in the following section.

²² South Bucks District Council (2011), South Bucks District Local Plan

5. Identification of new assessment areas

5.1 Scope of task

Following the review of the previous GBRs, Section 5 identifies whether there is a need for any further areas to be assessed in this study. This considers the geographical extent of the previous Stage 2 and 3 GBRs, land within the Green Belt under consideration as part of the Council's site selection work as well as updates to guidance about land that could be considered for release for sustainable development.

5.2 Evaluation of extent of previous assessments

The full extent of Stage 2 parcels assessed in TRDC's Stage 2 GBR are shown below in Figure 6. When considering the level of coverage of the Green Belt achieved, TRDC used a thorough approach, applying a wide ring around all major settlements to identify parcels. This was complemented by the Stage 3 GBR which considered potential locations for a new settlement (Figure 7). Between the two studies, extensive coverage of the District's Green Belt was achieved in the assessments.

5.3 Evaluation of sites

TRDC provided a GIS data layer of potential sites being considered as part of its site selection work. Arup then compared this set of sites against the Stage 2 GBR parcels to cross check whether any additional parcels need to be assessed to ensure that Green Belt can be appropriately taken into consideration during site selection. Due to the extensive nature of the previous Stage 2 and 3 assessments, no additional requirement to assess further parcels was identified.

5.4 Evaluation of railway stations and motorway junctions

Recent updates to national policy and guidance on Green Belt (see Section 2 for further information) urge greater consideration as to whether proposed sites in the Green Belt are in sustainable locations for development. As such, many local planning authorities are assessing whether undeveloped land around their railway stations within the Green Belt might be considered as grey belt or recommended for release from the Green Belt for other reasons.

Consideration was given to all railway stations (mainline stations and London Underground stations) within the district. Three were identified as having significant areas of undeveloped land adjacent to or in the immediate vicinity of the station and within the Green Belt – Moor Park (a private estate), Chorleywood (mostly common land) and Kings Langley stations. However, the Stage 2 GBA had assessed parcels covering the land surrounding all three of these stations. No further assessment was therefore necessary.

Other local planning authorities are responding to the guidance updates by assessing land near motorway junctions as options for employment sites. However, it was determined that this was not necessary in Three Rivers as the local authority has very little employment need to fulfil.

5.5 Summary

In conclusion, the above evaluations demonstrate that no additional areas within Three Rivers require Green Belt assessment.

6. Provisional grey belt identification

6.1 Scope of task

For the purposes of plan-making, the grey belt is identified as any land that is not judged to strongly contribute to any one of purposes (a), (b), or (d) and that is not restricted by the application of policies in NPPF footnote 7. As set out in section 2.3, within a GBA it is only possible to provisionally identify grey belt based on the purpose scores, while final confirmation of grey belt status will be achieved through wider plan-making or through development management processes when NPPF footnote 7 can be taken fully into account. This section provides an overview of the provisional grey belt identification exercise undertaken for TRDC.

6.2 Grey belt scores and findings

The results of the Stage 2 GBA purposes assessment were filtered to isolate parcels which do not contribute strongly to any one of purposes (a), (b), or (d). The score values from the Stage 2 GBA were matched to the PPG's *weak*, *moderate* and *strong* contribution scale, as show in Table 5. Thus, parcels identified within the Stage 2 GBA as not having a relatively significant or significant impact were identified as provisional grey belt.

Table 5 Purpose scores

Stage 2 GBA score	Grey belt translation
Limited to No Impact	Weakly Contributes
Relatively Limited Impact	Weakly Contributes
Moderate Impact	Moderately Contributes
Relatively Significant Impact	Strongly Contributes
Significant Impact	Strongly Contributes

Provisional grey belt has been identified within the Green Belt parcels assessed in Stage 2. The results are summarised in Table 6 and illustrated spatially in Figure 6. Please see Appendix 2 for a detailed table of all parcels, providing purpose scores and overall grey belt status.

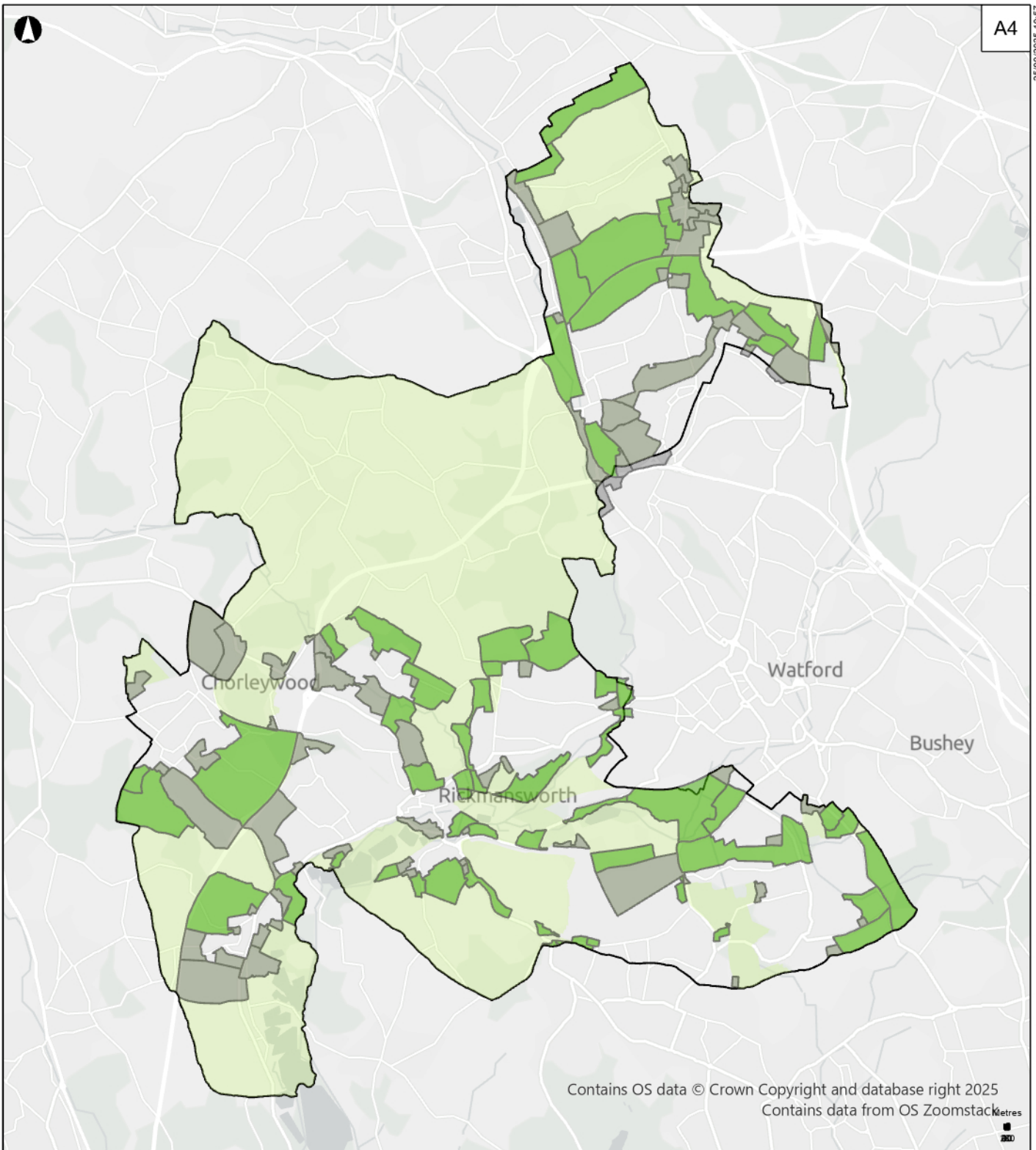
Table 6 Summary of grey belt land of green belt assessed in Three Rivers

Status (Provisional)	Number of Stage 2 Green Belt parcels	% of Green Belt parcels	% of assessed Green Belt Area	Area of assessed Green Belt (Ha)
Grey belt	76	55%	38%	932
Non-grey belt	63	45%	63%	1,441
Total	139	100%	100%	2,373

Note: Figures may not sum due to rounding

Provisional grey belt parcels are scattered throughout the district with no clear concentration (Figure 12). There are provisional grey belt parcels in the washed over villages of Bedmond and Heronsgate, between Abbots Langley and Leavesden, on the northern edge of Chorleywood and Rickmansworth, and south of Maple Cross.

Just over half of the assessed parcels are provisionally deemed grey belt, equating to around 40% of the assessed Green Belt land.



- Three Rivers Green Belt
 Three Rivers District Boundary
Provisional Grey Belt
 Green Belt
 Grey Belt

Coordinate System: British National Grid

V3	25/09/25	SP	TB	KF	--
Rev	Date	By	Chkd	Appd	Authd

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Project Name

Green Belt Assessment (2025)

Drawing Title

**Figure 6: Provisional Grey Belt
identified in assessed Green Belt
parcels (those outside of district
removed)**

Scale at A4

1:85,000

Role

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Suitability

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Project Number

308127-00

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Drawing Number

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6.3 Next steps

As previously mentioned, purpose scores only form part of the determination of grey belt status. Thus, the Council should review whether the application of policies relating to NPPF footnote 7 would provide a strong reason for refusing or restricting development, once more detail is known for parcels or sites either through plan-making or the development management process. In reaching this judgement, the PPG states that authorities should consider both where areas of grey belt would be covered by or affect designations in NPPF footnote 7.

Since the Stage 2 GBA involved a filtering process to remove assessment areas which were entirely or largely covered by major policy constraints (which were considered to effectively rule out development of the land) some of the footnote 7 constraints have already been partially taken into consideration. The following constraints were considered:

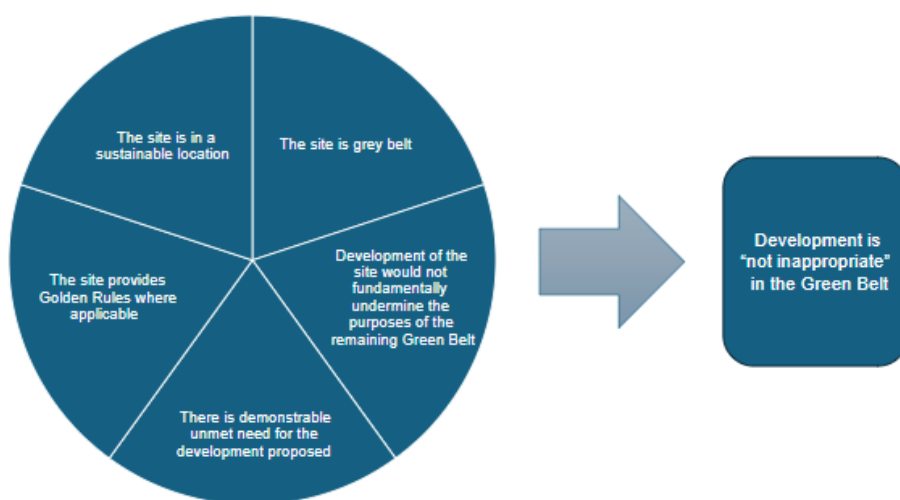
- Scheduled Monuments;
- Registered Parks and Gardens;
- Sites of Special Scientific Interest;
- Local Nature Reserves;
- Ancient Woodland;
- Common land; and
- Flood Zone 3b.

The analysis contained within the GBA forms only part of the footnote 7 judgement. Therefore, the Council should review whether the application of the full range of designations relating to footnote 7 would provide a strong reason for refusing or restricting development.

Once this final exercise has been completed, the Council will be able to confirm grey belt status of parcels, or sites within parcels. Confirmation of grey belt status will not necessarily equate to land being allocated for development or released from the Green Belt. As part of the plan-making process the Council will need to consider the balance of wider planning factors, including whether the release of Green Belt sites (including but not limited to grey belt land) would contribute to a sustainable pattern of development and apply the ‘fundamentally undermine test’ for any proposed Green Belt release, in line with national policy and guidance.

It should be noted that for the purposes of decision-making, if a site is judged to be grey belt and its release would pass the fundamentally undermine test, then it will still be necessary to consider whether development would not be inappropriate in the Green Belt, in line with the NPPF (paragraph 155), as illustrated in Figure 2 of the NPPF (Figure 7).

Figure 7 When is development in the Green Belt not inappropriate under paragraph 155 of the NPPF?



Source: MHCLG (2025) Green Belt - GOV.UK, Paragraph: 010 Reference ID: 64-010-20250225

7. Washed over villages commentary

7.1 Scope of task

This section provides an updated commentary on the washed over villages that were previously assessed through the Stage 1 GBR, alongside considering whether the national policy changes effect the previous recommendations.

7.2 Outcome of Stage 1 assessment

Outside of the urban areas in Three Rivers District, there are a number of smaller villages, hamlets and isolated dwellings washed over by the Green Belt. The case for in-setting of settlements within the Green Belt was considered as part of the Stage 1 GBR, with the villages of Heronsgate, Sarratt and Bedmond being assessed. Sarratt and Bedmond are identified as villages in the Three Rivers settlement hierarchy (see Table 4), with Heronsgate being considered as an extension to Chorleywood (identified as a key centre).

The Stage 1 GBR reviewed the settlements in the context of NPPF 2012 paragraphs 84, 86 and 89(5) relating to sustainable patterns of development, washed over villages and limited infilling respectively (now NPPF 2024 paragraphs 148, 150 and 154 (e)). It concluded that Heronsgate and Sarratt should remain washed over. This was considered appropriate as it reflected the general low-density character of these villages as well as their strong relationship and contribution to the Green Belt. Whereas the report concluded that there was a case to consider insetting Bedmond and establishing a village envelope, if additional development needed be identified around the village. This was due to the compact form and densities within Bedmond and its variable relationship with the Green Belt. Figure 8 shows the character, analysis and recommendations for each village taken from the Stage 1 GBR.

Figure 8 Outcome of Stage 1 GBR washed over villages assessment

Settlement	Character and Relationship with the Green Belt	Analysis and Recommendation
Heronsgate	<p>A collection of dwellings set within large plots as an extension to Chorleywood to the north west. The settlement has historical significance as the first Charter Settlement in Great Britain. As such it has Conservation Area status to protect the character of the settlement, which includes the relationship between the dwellings and their landscape setting. Generally, there is a strong unity of character and high sensitivity to change.</p> <p>The connection between the settlement and the Green Belt which largely surrounds is variable, being strongest to the south west where the soft edges of the housing plots effectively merge into the wider open countryside, and more detached to the north east across Long Lane. The M25 severs the connection to the south east.</p>	<p>The settlement has a unique character (recognised by its Conservation Area status) and a generally strong relationship with the Green Belt within which it sits. The very low density character of the development means that whilst it represents built development, the openness of the Green Belt is largely maintained, with the settlement making a contribution to Green Belt character in this locality. Definition of a settlement boundary could prompt more dense development and hence erosion of the relationship between the settlement and its Green Belt setting and its broader landscape setting (the Chilterns AONB lying to the south west).</p> <p>DO NOT INSET</p>
Sarratt	<p>A street village built around an extended green which is the focus for a Conservation Area which protects its attractive spacious character and individual dwellings arranged around The Green.</p> <p>There are several modern extensions to the village, two of which are linear in character (extending south westwards) and one is more nucleated (to the north west). Together, these comprise a relatively large settlement, although there is a sense of spaciousness and hence connection with, and contribution to, the wider Green Belt.</p>	<p>The unique character of Sarratt along the village axis of The Green which has an open character and a high degree of permeability connecting to the wider Green Belt, means that insetting is inappropriate. Notwithstanding some somewhat incongruous additions to the built extent of the village any further increase in density would erode the sense of connection with, and contribution to, the wider Green Belt and its landscape setting (the Chilterns AONB lying to the south west).</p> <p>DO NOT INSET</p>
Bedmond	<p>A clustered village of highly varying character, centred on the junction of Toms Lane and High Street. Modern extensions have expanded the village to create a relatively dense form with often limited connection with the wider Green Belt in which it sits. Whilst the village is small, the sense of visual or physical connection with the Green Belt is only strongly apparent at its edges, some of which are affected by localised sprawl of permanent and semi-permanent development.</p>	<p>The relatively dense character of the village and its evolution through clusters of growth means that the relationship with and contribution to the surrounding Green Belt is relatively weak. Whilst the locality generally (sitting between Watford and Hemel Hempstead) is vulnerable to change through sporadic encroachment and localised sprawl along minor roads, the definition of a village envelope could help to better define the role and longer term character of the village.</p> <p>POTENTIAL FOR INSETTING</p>

Source: Amec Wheeler Foster (2017) Green Belt Review – Strategic Analysis

7.3 Implications of policy and guidance

As set out in the NPPF, villages which make an important contribution to the openness of the Green Belt should remain washed over and retain their Green Belt designation, with paragraph 150 (NPPF 2024) setting out the following specific policy in relation to villages in the Green Belt: *“If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”*

However, alongside the consideration of the village’s contribution to the openness of the Green Belt, it is necessary to consider whether Green Belt designation is constraining the ability for these villages to develop to support their communities. Therefore, it is important to consider that *“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”* and that *“Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt”* (NPPF 2024, para 148).

It is worth noting, that even if the villages remain washed over by the Green Belt, national policy supports *“limited infillings in villages”* (NPPF 2024, para 154 (e)).

This policy approach towards washed over and inset villages in the Green Belt has stayed consistent since the 2012 NPPF, therefore the assessment conducted in the Stage 1 GBR is still considered to align with national policy.

7.4 Village commentary

This section reviews the villages of Heronsgate, Sarratt and Bedmond giving consideration to the village’s character, Green Belt assessment including provisional grey belt identification and the sustainability of the villages before providing an updated recommendation as to whether they should be considered for inseting or remain washed over by the Green Belt.

7.4.1 Heronsgate

Location: Heronsgate is located to the southwest of Three Rivers District. It lies to the southeast of Chorleywood and is considered an extension to this settlement. Heronsgate is fully washed over by the Green Belt.

Village character: The village is a collection of dwellings that are set within large plots, with the overall density of development being less than two dwellings per hectare. This low density per hectare allows the settlement to predominately maintain the openness of the Green Belt. The character of the settlement is recognised in its Conservation Area, which was designated in 1993²³, the “Heronsgate Conservation Area”. A review of published online data sources, including the AMR housing completions and Housing Land Supply statements, revealed no significant development within the village since the Stage 1 GBR analysis was undertaken and therefore it has been assumed there is correspondingly no substantive change to the village character.

Green Belt Assessment: In the Stage 1 GBR, Heronsgate was covered by parcel SW7. In this assessment, the parcel SW7 was assessed as making a ‘contribution’ to each of the purposes (a)-(d) and given an overall assessment of ‘contribution’.

In the Stage 2 GBR, Heronsgate was covered by CH6 and given a harm rating of ‘Moderate-High’.

In this study, the Stage 2 GBR parcel CH6, has been provisionally identified as grey belt (See Section 6 and Appendix A.2).

²³ BEAMS Ltd (2012) Heronsgate Conservation Area Appraisal, available here: <https://cdn.threerivers.gov.uk/files/2023/02/7f16a640-b1d3-11ed-a36d-4ffc695009c9-final-heronsgate-ca-appraisal-2012-final.pdf>

Settlement Hierarchy: The Council's Settlement Appraisal,²⁴ identified Heronsgate as having 'poor' sustainability. The Settlement Appraisal concluded that settlements with a poor sustainability score have limited potential for growth, with only minor development through small sites and infill potentially being appropriate. The Council are updating their settlement hierarchy as part of the emerging Local Plan and should the appraisal reach a different conclusion about the growth potential of the village, it may be necessary to review the washed over village recommendation.

Recommendation

The Stage 1 GBR recommended that Heronsgate should remain washed over. Since that assessment, there have been no significant changes to the overall character of the village and the Stage 2 GBR identified Heronsgate as an area where development in the Green Belt would lead to moderate-high harm.

Although the Stage 2 parcel that contains Heronsgate has provisionally been identified as grey belt; its final status will need to be confirmed through the Council's site selection work. As highlighted in section 6.3 grey belt status does not necessarily equate to allocation or release of Green Belt land and wider planning factors will need to be considered, including the sustainability of the location.

The latest available settlement hierarchy appraisal concluded that Heronsgate had a poor sustainability score and limited potential for growth. Subject to the Council's emerging updated appraisal, it is therefore reasonable to assume that the village's future character is unlikely to be changed by significant development in the future and will likely continue to make the same contribution to the Green Belt's openness. Therefore, it is still recommended that the settlement remains washed over and is not inset within the Green Belt.

7.4.2 Sarratt

Location: Sarratt is located to the northwest of Three Rivers District, and it is fully washed over by the Green Belt.

Village character: Development of village has taken place along The Green, which has an associated Conservation Area, designated in 1969²⁵, "The Green, Sarratt". Sarratt Green had changed very little in its plan since the medieval period and had not been extensively developed. The Conservation Area is very tightly drawn around the Green and its associated development with a linear nature. The Green's character is very open, which allows the village to maintain a sense of openness of and connection to the Green Belt. A review of published online data sources, including the AMR housing completions and Housing Land Supply statements, revealed no significant development within the village since the Stage 1 GBR analysis was undertaken and therefore it has been assumed there is correspondingly no substantive change to the village character.

Green Belt Assessment: In the Stage 1 GBR, Sarratt was covered by parcel NW4. In this assessment, the parcel NW4 was assessed as making a 'strong contribution' to purposes (a) and (c), a 'low contribution' to purpose (b) and a 'contribution' to purpose (d) and given an overall assessment of 'strong contribution'.

There were no relevant parcels in the Stage 2 GBR, and therefore there are no parcels which could be classed as grey belt adjacent to the settlement.

Settlement Hierarchy: The Council's Settlement Appraisal, identified Sarratt as having 'fair' sustainability, meaning the village could potentially accommodate additional development that might benefit the settlement's role and maintain or enhance the viability of services. On this basis, the adopted Core Strategy²⁶, identified Sarratt as suitable for some limited development within the village, with Policy PSP4 "Development in Villages (Bedmond, Sarratt)" providing the policy framework for development. The Council are updating their settlement hierarchy as part of the emerging Local Plan and should the appraisal

²⁴ Three Rivers District Council (2010) Settlement Appraisal. Through discussion with the Council, it was highlighted that work is ongoing to update the settlement hierarchy. At the time of publication, the 2010 Settlement Appraisal is the latest available published evidence base document.

²⁵ BEAMS Ltd (1994) The Green, Sarratt Conservation Area Appraisal and Townscape Assessment, available here: <https://cdn.threerivers.gov.uk/files/2023/02/9f851060-b1dd-11ed-a36d-4ffc695009c9-the-green-sarratt-conservation-area-appraisal-1994.pdf>

²⁶ Three Rivers District Council (2011) Local Development Framework Core Strategy

reach a different conclusion about the growth potential of the village, it may be necessary to review the washed over village recommendation.

Recommendation

The Stage 1 GBR recommended that Sarratt should remain washed over. Since that assessment, there have been no significant changes to the character and openness of the settlement and contribution to the Green Belt, in particular the high degree of permeability of The Green that runs through the centre of Sarratt. The latest available settlement hierarchy appraisal concluded that Sarratt had a fair sustainability score and may be able to accommodate additional development. It was thus identified for limited development within the adopted Core Strategy.

It is recommended that the settlement remains washed over and is not inset within the Green Belt. However, this should be subject to review depending on the outcome of the Council's emerging updated settlement appraisal, and whether the Council's site selection work identifies potential site(s) that may likely change the character and openness of Sarratt.

7.4.3 Bedmond

Location: Bedmond is located to the north of Three Rivers District, in the area of Green Belt between Abbots Langley and Hemel Hempstead, and it is fully washed over by the Green Belt.

Village character: Bedmond's character varies throughout and is primarily composed of a mix of terraced, semi-detached and detached residential properties centred on the junction of Toms Land and High Street. The dense character of the village results in there being limited connection to the wider Green Belt, with this only being apparent towards the edge of the settlement. There are no Conservation Areas associated with Bedmond. A review of published online data sources, including the AMR housing completions and Housing Land Supply statements, revealed no significant development within the village since the Stage 1 GBR analysis was undertaken and therefore it has been assumed there is correspondingly no substantive change to the village character.

Green Belt Assessment: In the Stage 1 GBR, Sarratt was covered by the parcels N7, N8, N10 and N11, all of which were assessed to make a strong contribution overall to the Green Belt (Table 7).

Table 7 Stage 1 GBR parcel assessments

Parcel	Purpose (a)	Purpose (b)	Purpose (c)	Purpose (d)	Overall assessment
N7	Contribution	Strong Contribution	Strong contribution	Low contribution	Strong contribution
N8	Contribution	Strong contribution	Contribution	Low contribution	Strong contribution
N10	Low contribution	Strong contribution	Strong contribution	Low contribution	Strong contribution
N11	Low contribution	Strong contribution	Strong contribution	Low contribution	Strong contribution

In the Stage 2 GBR, there were a number of parcels defined at and around Bedmond. Figure 9 provides an overview of the harm rating each of these parcels was given with Figure 10 showing these mapped.

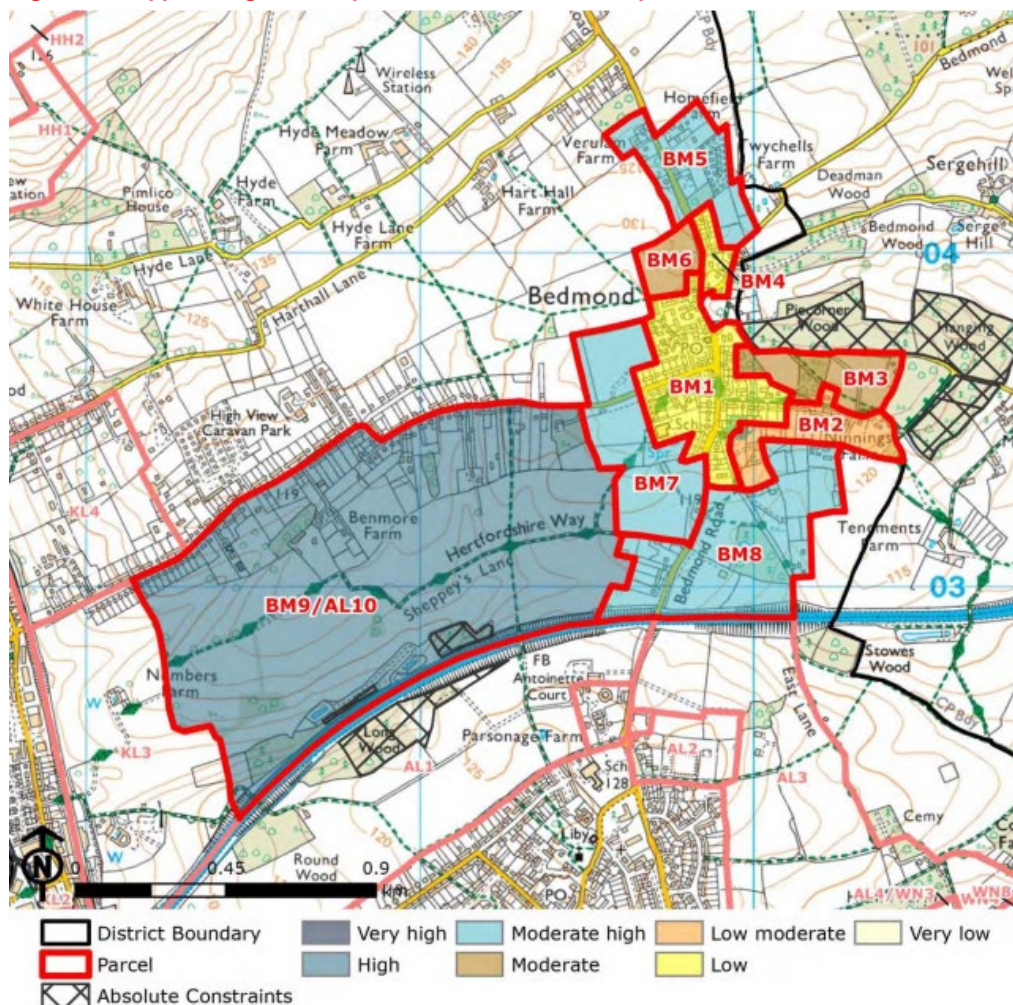
It should be noted that parcel BM1 covers the existing washed over village area, with the Stage 2 GBR suggesting this could constitute a new inset settlement. Parcel BM4 is also fully developed with there being a slight distinct from the core of the village due to tree cover but could also be part of the inset settlement.

Figure 9 Outcome of Stage 2 GBR parcel assessment for the parcels at/around Bedmond

Settlement	Parcel	Harm Rating
Bedmond	BM1	Low
	BM2	Low-Moderate
	BM3	Moderate
	BM4	Low
	BM5	Moderate-High
	BM6	Moderate
	BM7	Moderate-High
	BM8	Moderate-High
	BM9	High

Source: LUC (2019) Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough

Figure 10 Mapped Stage 2 GBR parcel assessment for the parcels at/around Bedmond



Source: LUC (2019) Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough

In this study, seven of the nine Stage 2 GBR parcels have been provisionally identified as grey belt (see Section 6 and Appendix A.2). Only BM7 and BM9 did not receive this provisional status.

Settlement Hierarchy: The Council’s Settlement Appraisal identified Bedmond as having ‘fair’ sustainability, meaning the village could potentially accommodate additional development that might benefit the settlement’s role and maintain or enhance the viability of services. On this basis, the adopted Core Strategy²⁷, identified Bedmond as being suitable for some limited development with the village, with Policy PSP4 “Development in Villages (Bedmond, Sarratt)” providing the policy framework for development. The Council are updating their settlement hierarchy as part of the emerging Local Plan and should the appraisal

²⁷ Three Rivers District Council (2011) Local Development Framework Core Strategy

reach a different conclusion about the growth potential of the village, it may be necessary to review the washed over village recommendation.

Recommendation

At Stage 1 GBR, it was recommended that Bedmond had potential for insetting due to its dense character and lack of connection with the surrounding Green Belt. The character of Bedmond and its connection to the Green Belt has not changed in the period since the Stage 1 GBR was conducted. The Stage 2 GBR identified if the parcels BM1 and BM4 (that cover most of the existing built form of the settlement) were removed/inset, this would result in 'low' harm to Green Belt purposes. However, development in the parcels that surround Bedmond (BM3 and BM5-BM8) would lead to 'moderate' to 'moderate-high' harm to the Green Belt

The majority of the Green Belt in and around Bedmond has provisionally been identified as grey belt. Final status will need to be confirmed through the Council's site selection work. As highlighted in section 6.3 grey belt status does not necessarily equate to allocation or release of Green Belt land and wider planning factors will need to be considered, including the sustainability of the location.

The latest available settlement hierarchy appraisal concluded that Bedmond had a fair sustainability score and may be able to accommodate additional development. It was thus identified for limited development within the adopted Core Strategy. Subject to the Council's emerging updated settlement appraisal, it is assumed that the village's future character is unlikely to be changed by significant development in the future and will likely continue to make the same contribution to the Green Belt's openness. It is also assumed that it is likely to continue to be a location where only limited development is appropriate.

It is recommended that in line with the Stage 1 GBR, that Bedmond is inset as it does not make an important contribution to the openness of the Green Belt. A defined village envelope should be established, that considers the harm assessment from the Stage 2 GBR, the outcomes of the Council's emerging updated settlement appraisal, and whether the Council's site selection work identifies potential site(s) in or around Bedmond.

8. Fundamentally important areas

8.1 Scope of task

This section identifies broad areas of ‘fundamental importance’ within the Green Belt in Three Rivers. This analysis is intended to provide evidence for the Council to underpin any future ‘fundamentally undermine’ test that will need to be set out as part of an exceptional circumstances case when reviewing Green Belt boundaries.

Broad areas of ‘fundamental importance’ are those which perform a strategically important role against the Green Belt purposes across the plan area and are therefore considered the most sensitive to change. Green Belt does not necessarily need to perform strongly against *all* purposes to be considered fundamentally important to the Green Belt.

The identification of these areas was based on the evidence generated in the Stage 1 GBR in particular the published mapping and pro forma narratives. It should be noted that the broad areas identified do not necessarily align with the parcel boundaries within the Stage 1 GBR.

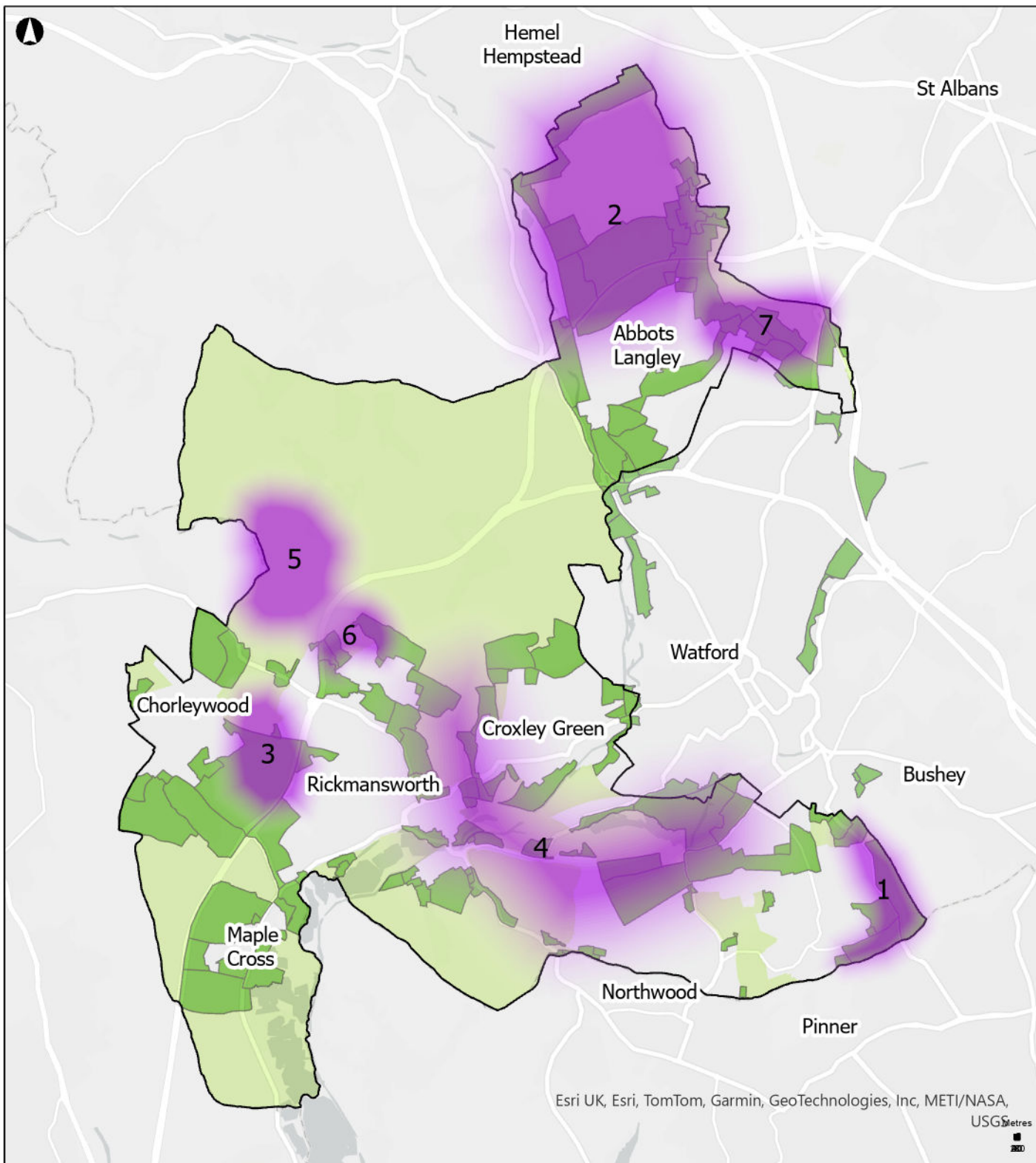
8.2 Analysis

The analysis looks to identify broad areas of Green Belt within Three Rivers that are judged to be of fundamental importance to the District with regards to purposes (a) – (e).

- Purposes (a), (b) and (c): Several factors were taken into consideration to identify broad areas that appeared to be of fundamental importance to each of these purposes across the Three Rivers Green Belt. In identifying broad areas, the study team considered location including geographical concentrations of strongly performing parcels, development pressures in their vicinity, the absence of physical features in preventing sprawl and development and the presence of particularly acute gaps between nearby towns.
- Purpose (d): Although assessment against purpose (d) was undertaken as part of the 2017 Stage 1 GBR, it was acknowledged that there are no historic towns within the district and the analysis was based on Conservation Areas only. While in the Stage 2 GBR, it was noted that the local context applied in Stage 1, i.e. assessing purpose (d) in relation to Conservation Areas was more appropriately considered as part of a landscape or cultural heritage sensitivity assessment. Subsequently and given that no historic towns were identified of relevance to this purpose, no assessment of this purpose was undertaken for the Stage 2 GBR. On this basis, it has been judged that there are no areas within the local Green Belt that can reasonably be argued to be ‘fundamentally important’, to preserving the setting and character of historic towns.
- Purpose (e): Similarly, the performance of the Green Belt against purpose (e) was assessed for the Green Belt as a whole in the Stage 1 GBR. All the Green Belt has been deemed to equally make a ‘limited contribution’ to purpose (e) and there can be no differentiation between areas in considering fundamental importance. Therefore, no areas are of fundamental importance in respect of purpose (e).

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 taken together across the plan area (Figure 11). These areas and the rationale for their identification are identified in Table 8.

It is worth noting that the village of Bedmond, recommended in Section 7 for insetting within the Green Belt, sits within one of these areas of fundamental importance between Hemel Hempstead and Watford. This will need to be taken into consideration in any final decision regarding the insetting of Bedmond.



- Fundamentally Important Areas
- Three Rivers Stage 2 Parcels
- Three Rivers Green Belt
- Three Rivers District Boundary

Coordinate System: British National Grid

V3	25/09/25	SP	TB	KF	--
Rev	Date	By	Chkd	Appd	Authd

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Project Name

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Drawing Title

Figure 11: Broad Areas of Fundamental Importance

Scale at A4

1:85,000

Role

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Project Number

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Drawing Number

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Table 8 Broad areas of fundamental importance

Area of the Green Belt	Area ID	Purpose contribution	Explanation
Area to the south-east of Watford and east of South Oxhey	1	Contribution to purpose (a), checking the unrestricted sprawl of Watford and South Oxhey and purpose (b), preventing the neighbouring towns of Watford, Bushey and the built-up area of London from merging.	This area of Green Belt may be deemed of fundamental importance to the wider Green Belt as it checks the unrestricted spread of both the south-eastern edge of Watford at Watford Heath and at South Oxhey, containing the potential for sprawl across the A4008 into open land. It also checks the spread of South Oxhey southwards and so preventing a merger with the large built-up area extending out from Greater London at Pinner (Hatch End). The area therefore plays an important role in maintaining the wider gap between Watford, South Oxhey, Carpenders Park and Harrow and London.
Area between Hemel Hempstead and Abbots Langley.	2	Contribution to Purpose (a), checking the unrestricted sprawl of Hemel Hempstead, Contribution to purpose (b), preventing the neighbouring towns of Hemel Hempstead, Abbots Langley, St Albans and Watford from merging and contribution to purpose (c), maintaining openness and preventing encroachment on the countryside.	This area of Green Belt may be deemed of fundamental importance to the wider Green Belt for preventing the sprawl of Hemel Hempstead where a lack of physical boundaries and a significant degree of progressive intrusion into this area by development, places significant pressure on its boundary. It is also important for preventing the physical and perceptual merger of Watford, Hemel Hempstead, St Albans and Abbots Langley. This area of Green Belt may also be deemed of fundamental importance to the wider Green Belt as it constitutes open countryside between Watford and Hemel Hempstead protecting open countryside from further incremental change across land which has been subject to a significant degree of progressive intrusion.
Area between Rickmansworth and Chorleywood	3	Contribution to purpose (b), preventing the neighbouring towns of Rickmansworth and Chorleywood from merging.	This area of Green Belt may be deemed of fundamental importance to the wider Green Belt as it prevents the physical and perceptual merging of these towns. The gap between Rickmansworth and Chorleywood is relatively small compared to gaps between other towns in the context of the Three Rivers Green Belt.
Area between Rickmansworth, Croxley Green, Northwood and Watford	4	Contribution to purpose (b), preventing the neighbouring towns of Rickmansworth, Watford and Northwood from merging.	This area of Green Belt may be deemed of fundamental importance to the wider Green Belt as it prevents the physical and perceptual merging of these towns. The area is characterised by a complex pattern of development and often very narrow areas of Green Belt land, comprising small gaps between settlements. It is thus playing a significant role in preventing multiple settlements from merging.
Area to the west of the district, north of Chorleywood	5	Contribution to purpose (c), maintaining openness and preventing encroachment on the countryside.	This area of Green Belt may be deemed of fundamental importance to the wider Green Belt as it helps to maintain the openness of this relatively remote countryside to the north-west of the M25 in which there is evidence of incremental change, particularly in the vicinity of Sarratt.
Area to the north of Rickmansworth	6	Contribution to purpose (c), maintaining openness and preventing encroachment on the countryside.	This area of Green Belt may be deemed of fundamental importance to the wider Green Belt as it helps to maintain the openness of land between Chorleywood and the M25 as well as the separation of Chorleywood and Rickmansworth.
Area to east of Abbots Langley and north of Watford	7	Contribution to purpose (c), maintaining openness and preventing encroachment on the countryside.	This area of Green Belt may be deemed of fundamental importance to the wider Green Belt as it helps to prevent sprawl and encroachment into open countryside to the north and between Watford and Bricket Wood.

8.3 Next steps on Fundamentally Undermine

The broad areas identified above should be considered carefully by the Council when reviewing their proposed combination of sites for release and establishing whether they would fundamentally undermine the remaining Green Belt. Identification of an area of fundamental importance may not, however, mean that

these areas cannot accommodate some development, and it will be for the LPA to undertake a balanced judgement based on the scale and location of the proposed land for release.

For purposes (a)-(c), while it is possible to identify areas of fundamental importance for their contribution to these purposes, it should be clarified that it is currently unknown exactly where the pressures from development on the Green Belt will occur. Once the Council has formulated a spatial strategy, as part of the ‘fundamentally undermine test’, it should cross reference the areas of likely development pressure within the Green Belt, against those areas identified in this assessment as of fundamental importance against the purposes to consider whether the planned growth strategy would impact adversely on the performance of these areas of importance.

As ascertained from a review of recent planning appeals (see Section 2 and Appendix A.1), the proportional loss of Green Belt should also be considered in relation to the totality of the Green Belt within a local authority. The smaller the proportional loss, the less likely that loss would fundamentally undermine the purposes (taken together) of the remaining Green Belt. Equally consideration should be given as to whether any land proposed release plays a wider strategic role within the functioning of the Green Belt.

9. Conclusions and recommendations

9.1 Green Belt Review

TRDC began reviewing its Local Plan in 2017. As part of its preparation of an evidence base to inform this review, it completed three GBR studies. Since the completion of these studies, there have been multiple changes to national Green Belt planning policy and guidance, including the introduction of grey belt. Arup was appointed by TRDC to review and update its Green Belt evidence in light of updated national policy and guidance.

It was found through the course of this study that the previous GBR studies are still aligned with new policy and guidance as well as the latest case law. As such, assessment areas did not require re-assessment and collected data was deemed fit to be relied upon, going forward.

The study also considered the spatial extent of the previous GBRs and whether there was a need for any further areas to be assessed in this study. This considered the geographical extent of the previous Stage 2 and 3 GBRs, land under consideration as part of the Council's site selection process as well as land in potentially sustainable locations. The study concluded that the approaches previously taken were proportionate and no new parcels needed to be assessed.

9.2 Grey belt

The study went on to consider TRDC's Green Belt evidence with regards to the new policy requirement to identify grey belt as outlined in national policy and guidance. Following the key steps set out in the Green Belt PPG and based on the assessment scores of the Stage 2 parcels for NPPF purpose (a), (b) and (d), it was identified that 55% of the parcels assessed in the Stage 2 GBR are provisionally 'grey belt' (equating to around 40% of the Green Belt area assessed at Stage 2).

Identified provisional grey belt parcels are scattered throughout the district with no clear concentration. There are provisional grey belt parcels in the washed over villages of Bedmond and Heronsgate, between Abbots Langley and Leavesden, on the northern edge of Chorley and Rickmansworth, and to the south of Maple Cross. The Council will need to confirm grey belt status through wider plan-making or development management processes by considering the second half of the grey belt definition relating to the application of NPPF Footnote 7.

In terms of development management, if a site is judged to be grey belt and its release would pass the fundamentally undermine test, then it will still be necessary to consider whether development would not be inappropriate in the Green Belt, in line with the NPPF (paragraph 155), as illustrated in Figure 2 of the NPPF (Figure 7).

As highlighted in the Green Belt PPG, not all grey belt will necessarily be allocated for development or released from the Green Belt. It is for the Council to decide the extent to which this takes place in considering the balance of planning factors as part of the wider plan-making or development management processes.

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 in plan-making, 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. In practice, 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 GBR.

9.3 Washed over villages

A review of the previous washed over villages assessment (part of the Stage 1 GBR) was conducted to consider whether any changes were necessary in light of the new policy and guidance. It was concluded that

the approach taken in the assessment still aligned with current policy and guidance and could still be relied upon.

Consideration was also given as to whether there were any changes in circumstances, including the identification of grey belt that would require amended to the conclusions reached in the Stage 1 GBR. After reviewing the physical and policy contexts for the villages, it is recommended that, in line with the Stage 1 GBR, that Heronsgate and Sarratt should remain washed over within the Green Belt, and that Bedmond be considered for inseting within the Green Belt with a defined village envelope.

9.4 Fundamentally important areas

The study provided analysis to support any future efforts by the Council to conduct ‘fundamentally undermine’ tests when reviewing their Green Belt boundaries. It presented an assessment that looked across the Three Rivers Green Belt to identify strategic-scale areas that were of ‘fundamental importance’ against each purpose of the Green Belt, taken together.

Seven areas were identified that should be considered by the District Council when reviewing their proposed combination of sites for release and establishing whether they would fundamentally undermine the remaining Green Belt. Identification of an area of fundamental importance may not, however, mean that these areas cannot accommodate some development, and it will be for the District Council to undertake a balanced judgement based on the scale and location of the proposed land for release.

Appendices

A.1 Review of recent appeals

It is useful and necessary to examine case law as it provides guidance on the interpretation of key terms/concepts within the NPPF, hence increasing the robustness of the study as a whole. It is important to consider the impact of these judgements on Green Belt Assessment methodologies and approaches since Inspectors may consider this at Independent Examination as was the case in North Hertfordshire, where the council was asked to review Green Belt outcomes with respect to recent judgements.

A.1.1 Spatial and Visual Openness

Paragraph 142 of the NPPF states that one of the fundamental characteristics of the Green Belt is its openness. The PPG states that openness consists of both visual and spatial aspects, and that the degree of activity on a site can also impact overall openness. There have been various appeals that have highlighted the important considerations surrounding the interpretation of ‘openness of the Green Belt’ and are therefore relevant to the assessment of the land against Green Belt purposes.

The Turner judgement (2016)²⁸ highlighted important considerations on openness. It states that the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Greenness is also a visual quality, and the preservation of the visual openness should also be considered.

‘There is an important visual dimension to checking “the unrestricted sprawl of large built-up areas” and the merging of neighbouring towns, as indeed the name “Green Belt” itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. 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 “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.’

Appeal cases in Three Rivers²⁹ and Cheshire West and Chester³⁰ further highlight the need to carefully consider ‘openness’. In the former case, the Inspector concluded the proposal for three dwellings should be allowed as it constituted limited infill development in a village and formed appropriate Green Belt development, therefore the impact of the proposal on openness did not need to be assessed. However, that being said, the Inspector concluded that, regardless, any possible impact on openness would be offset by the removal of an existing structure with a similar footprint to the proposed development.

‘I therefore conclude that the proposal would constitute limited infill within a village and would therefore not be inappropriate development within the Green Belt. Accordingly, there is no need to examine if very special circumstances exist to outweigh any harm arising from inappropriateness. ...

In view of my finding that the proposal is not inappropriate development, the impact on openness does not fall to be formally considered, but the impact of proposal on the openness of the Green Belt would be offset to a large degree by the removal of the barn that has a similar footprint to the proposed houses.’

A case in Cheshire West and Chester concerned plans for a new home to be developed on previously developed land designated as Green Belt. The site concerned was a builder’s yard on the edge of a washed over village. The Inspector concluded that it could not be considered infill development, given that it was

²⁸ Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin)

²⁹ Planning Inspectorate (2018) Appeal Ref: APP / P1940/W/17/3183388 – Clovercourt Ltd v Three Rivers District Council

³⁰ The Planning Inspectorate (2018) Appeal Ref: APP/ A0665/ W/ 17/ 3190601 – Clegg v Cheshire

widely spaced from neighbouring houses and had frontages onto different roads. Further the development would urbanise the site and its surroundings, thereby diminishing the openness of Green Belt. The appeal was accordingly dismissed as follows.

‘Indeed, in line with the 2016 *Turner v Secretary of State and East Dorset Council* judgement the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Such an approach would be far too simplistic and ignore the wider aspects of openness which goes beyond the physical effect of buildings or structures. Factors relevant include how built-up the Green Belt is now and how built-up would it be after development has taken place. Consequently, although it may be accepted that the proposal to redevelop a brownfield site may result in a reduced volume and footprint compared to the buildings and structures currently in place, there are wider factors that must be taken into account in defining the effect of the proposal on openness.

In assessing the matter of openness there are a number of ways of determining whether there would be encroachment into the Green Belt. The effect of development as encroachment on the countryside may be in the form of loss of openness or intrusion. The Framework identifies that openness is an essential characteristic of the Green Belt.’

The Secretary of State³¹ approved plans to build a replacement secondary school and new homes on land designated as Green Belt east of Guildford, after ruling that ‘very special circumstances’ had been demonstrated. He agreed with the Inspector that the scheme represented a significant development in the Green Belt which would, inevitably and significantly reduce its openness and would erode the open context of the village. Noting the substantial harm to the Green Belt, however, he ruled that the provision of new housing and a new school carried greater weight.

The Inspector’s note³² for this appeal highlighted some key considerations in relation to Green Belt, which are relevant to this assessment:

- The two essential attributes of the Green Belt are its permanence and openness, in line with NPPF (paragraph 142);
- The key element to assess is the effect that a development has on the openness of the Green Belt;
- The ‘concept of ‘openness’ is generally considered to be land being free from built development.’; and
- Although openness should be assessed on an individual site/area basis, the cumulative impact on the Green Belt of development on adjacent sites/areas should be considered.

The Supreme Court in *R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council* [2020] UKSC 3³³ has provided important clarity as to the interpretation of the openness of the Green Belt and the relationship between ‘openness’ and ‘visual impact’ within the planning judgement of the decision maker. The judgment highlighted the important distinction in planning decisions between planning judgement and legal interpretation of planning policy. While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, will not be a strict nor mandatory determinative factor.

On the interpretation of ‘openness’ and the issue of ‘visual impact’ it was noted that:

‘The concept of “openness” in para 90 of the NPPF [now para 142] seems to me a good example of such a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: “to prevent urban sprawl by keeping land permanently open ...”. Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As PPG2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development.’

³¹ Ministry of Housing, Communities and Local Government, Secretary of State (2018) Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd and The Howard Partnership Trust

³² The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

³³ <https://www.supremecourt.uk/cases/uksc-2018-0077.html>

Importantly, the Supreme Court reinforced the importance of planning judgement within the role of the decision maker by stating:

‘[Openness] is a matter not of legal principle but of planning judgement for the planning authority or the inspector.

In appeal decision APP/M3645/W/24/3354630 (14th March 2025)³⁴ the appellant’s site was in use as a storage yard for construction materials, equipment and machinery and the inspector adjudged that the intensity of activity and use meant that the site’s existing state made a limited contribution to Green Belt openness. In addition, the inspector noted that hedgerows around the site formed a defensible boundary which screened views of the storage yard, resulting in negligible impacts on visual openness.

In contrast, appeal APP/C4615/W/24/3345744 (2nd April 2025)³⁵ was dismissed by the inspector as it was adjudged that existing mature planting around the site perimeter was insufficient to screen the proposed development from adjacent rights of way, and that the proposed battery storage system would therefore be visually intrusive in its rural location.

A further lesson from the judgement of Baroness Taylor in appeal APP/P1940/W/24/3346061 (12th May 2025),³⁶ within Three Rivers District, is the confirmation that substantial weight does not have to be given to any harm to the Green Belt deriving from harm to its openness where a proposed development is not inappropriate in the Green Belt (in this case a large data centre deemed to be on grey belt). The ruling also confirms that country parks (one element of the development proposal) preserve openness providing there is not significant built development on them.

A.1.2 Definition of Sustainable Locations

Paragraph 155 of the NPPF sets out four criteria that, if all met, would make any development appropriate in the Green Belt. Criterion (c) of paragraph 155 is that the development would be in a sustainable location, with reference to paragraphs 110 and 115. These paragraphs have a focus on access to sustainable transport and active travel modes; paragraph 110 states that “development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes”. Paragraph 115 requires that in assessing development sites it should be ensured that sustainable transport modes are prioritised, and that safe and suitable access to the site is available for all users.

In C Hall’s judgement in appeal APP/T2215/W/24/3354290 (26th February 2025)³⁷, the inspector determined that one of the core principles of the Framework is to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling”, and that the nine dwellings proposed on the appellant’s site at Newington Farm would be highly reliant on private cars due to limited access to local services and facilities by other transport modes. The inspector therefore dismissed the appeal, judging that the site was not in a sustainable location and did not satisfy the criteria in paragraph 155(c).

This point of view was also advanced by A Knight in their judgement in appeal APP/B1930/W/24/3342701 (3rd February 2025)³⁸. In this case the site was determined to be in a sustainable location, satisfying paragraph 155 criterion (c), due to suitable access to public transport as the site had good pedestrian connections to local bus networks.

The judgement of A Wright in appeal APP/B1930/W/24/3349988 (19th March 2025)³⁹ builds on this principle. The appellant’s site was within 650m of the nearest bus stop, and the inspector determined that local facilities and services could be accessed within acceptable, comfortable or realistic walking distances as

³⁴ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354630&CoID=0>

³⁵ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3345744&CoID=0>

³⁶ https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf

³⁷ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0>

³⁸ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3342701&CoID=0>

³⁹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3349988&CoID=0>

outlined in the Manual for Streets and other guidance. However, the inspector judged that the rural, unlit nature of the route and distances to bus stops and services did not satisfactorily meet the criteria of being accessible to all, or at all times (as outlined in NPPF paragraph 115), therefore making the site not sustainable under paragraph 155 criterion (c).

The judgement of Baroness Taylor in appeal APP/P1940/W/24/3346061 (12th May 2025),⁴⁰ within Three Rivers District, builds on this principle. Baroness Taylor took in to account the definition of the nearby settlement, Abbots Langley, in the Core Strategy Spatial Strategy, as one of six key centres in the District. The fact that the Spatial Strategy describes these centres as the most sustainable locations in the District constituted a reason to describe the site as sustainable. Additionally, Baroness Taylor noted that the Council had already considered and stated the site as appropriate for housing and that were housing to be delivered here it would be seen as sustainably located on the edge of a growth settlement, further influencing the judgement that the proposed development was in a sustainable location.

A.1.3 Grey Belt in unsustainable locations

In the Newington Farm decision APP/T2215/W/24/3354290 (26th Feb 2025)⁴¹ noted above, the appeal was dismissed due to the site being in an unsustainable location. This decision was made despite the site being identified as grey belt land. The inspector adjudged that the site did not contribute to purpose (a), (b) or (d), and additionally that as it was contained within the boundary of an existing farm which included existing buildings and hardstanding, it made a limited contribution to openness. As such it did not fundamentally undermine the performance of the wider Green Belt. Being in an unsustainable location due to distance from local services and public transport options however made development inappropriate.

Similarly, Inspector D Lewis judged in appeal decision APP/Z0116/W/24/3342877 (26th Mar 2025)⁴² that a site proposed for development was not in a sustainable location and moreover its location could not be made sustainable. Although the site was agreed by all parties to be grey belt land, not performing strongly against any of the purposes (a), (b), or (d), the unsustainability of the location was determined to render the proposal inappropriate development within the Green Belt, and the appeal was dismissed.

A.1.4 Definition of Towns and Sprawl

NPPF paragraphs 143(b) and (d) state that the purposes of the Green Belt are to prevent neighbouring towns merging into one another, and to preserve the setting of historic towns. There is no definition given in the NPPF as to what constitutes a ‘town’, but some recent appeal decisions provide some guidance.

In appeal APP/D3640/W/24/3347530 (12th March 2025)⁴³, an inspector ruled that the settlements of Bagshot and Windlesham did not constitute towns, being instead “villages of varying scales”, and that the appellant’s site which fell in between the two settlements therefore did not play a role with respect to paragraph 143(b). Both Bagshot and Windlesham had been defined as towns in the LPA’s GBA, but the inspector ruled that this carried less weight than the council’s Core Strategy, in which the settlement hierarchy defined Bagshot as a large village and Windlesham as a smaller village. The inspector also opined that even if both settlements were considered towns, that the parcel of land in their view would not materially erode the gap between them if released for development. Given that the site did not play a role with regards to paragraph 143(b), the inspector determined that it constituted grey belt land.

The judgement in appeal APP/H2265/W/24/3347410 (13th February 2025)⁴⁴ also provides guidance on the interpretation of Green Belt purposes with regard to preventing urban sprawl and the merging of neighbouring towns. The appellant’s site was argued by the council to play a role in preventing urban sprawl

⁴⁰ https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf

⁴¹ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0>

⁴² <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3342877&CoID=0>

⁴³ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3347530&CoID=0>

⁴⁴ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0>

as the proposals would contribute to ribbon development along the A20, however the inspector judged that paragraph 143(a) refers only to the unrestricted sprawl of large built-up areas. The nearest settlement (Wrotham) was judged to be a village and therefore not of relevance to this purpose, so the inspector determined that although the site would contribute to ribbon development, this did not amount to the unrestricted sprawl of a large built-up area. The same appeal judgement also stated that London is the most relevant large built-up area in this case with respect to paragraph 143(a), and that the site in question therefore did not perform strongly against this purpose.

In appeal APP/G5180/W/24/3354266 (31st March 2025)⁴⁵, the inspector judged that the neighbouring settlements of Chislehurst, Bickley and Petts Wood had the character of local centres rather than distinct towns as they have significantly merged. As such the appellant's site had an essentially suburban setting, and could not be considered to play a role with regards to preventing neighbouring towns from merging. Given this context, the inspector additionally judged that the site could not play a role in preserving the setting or special of historic towns and the site did not fulfil the purposes set out in paragraphs 143(b) or (d).

In appeal APP/M1520/W/24/3351658 (15th April 2025) the Inspector acknowledged that the settlement of Daws Heath in Essex had been classed as a town in the latest GBA and a village in other development plan documents. The Inspector deemed Daws Heath to be a village for the purposes of judging an appeal site close to the settlement on the basis stated that as services and facilities are limited and Daws Heath is not of a large scale, it must be considered a village. The Inspector reiterated that the appeal site could not, therefore, contribute to purposes (a) or (b) given this relates to large built-up areas and towns rather than villages.

A.1.5 Scale, granularity and proportionality of assessment parcels

In determining a series of six appeals – APP/H1515/W/24/3341474-79 (16th Jan 2025)⁴⁶ – Inspector T Gilbert-Wooldridge noted that all parties to the appeals agreed that the six parcels of land in question would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area. The reasoning behind this was that the parcels were small in size compared to the 'considerable extent' of the Green Belt across the borough (Brentwood). The inspector adjudged that the sites' scale caused them to make no more than a limited contribution to checking the unrestricted sprawl of large built-up areas.

Additionally, the inspector stated the following: "Looking at parcels is helpful in a strategic sense to inform plan-making and future development growth. However, for decision making, it seems more relevant to look at a site-specific level for determining grey belt land, otherwise the scale could be too large and skewed by land some distance from the actual site". This aligns with the text of the Green Belt PPG, which indicates that, when identifying grey belt land, using a small number of large parcels will generally not be an appropriate approach and assessment areas should be sufficiently granular to enable their varied contributions to the Green Belt purposes to be functionally determined.

In the Wrotham appeal covered above – APP/H2265/W/24/3347410 (13th Feb 2025)⁴⁷ – the inspector noted that the proposal would represent an irreversible encroachment of built form into open and undeveloped countryside. However, it was adjudged that the site's area would be small in relation to the totality of the Green Belt within the borough, and that it would therefore not fundamentally undermine the purposes of the Green Belt across the local authority area. As in the Brentwood example, the local authority in this instance (Tonbridge & Malling) was covered by over 70% Green Belt by total area, resulting in the impact of the release of a small land parcel being judged to be proportionally much less significant.

A similar conclusion was reached in the Dacorum appeal – App/A1910/W/24/3345435⁴⁸ (5th Aug 2025) where the Inspector concluded that the appeal site did not have a wider strategic role in the functioning of the borough's Green Belt as a whole. Therefore, the proposal would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the Borough's development plan area.

⁴⁵ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354266&CoID=0>

⁴⁶ <https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=60702043>

⁴⁷ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0>

⁴⁸ <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3345435>

A.1.6 Footnote 7 land

A further lesson to be drawn from the Wrotham appeal – APP/H2265/W/24/3347410 (13th Feb 2025)⁴⁹ – is that the presence of a footnote 7 designation on a site does not automatically mean a proposal will be refused. The site in question was within the Kent Downs National Landscape, but the inspector adjudged that the proposal would only have a “limited and localised” impact on the protected landscape, therefore not providing the ‘strong reason’ for refusal required by paragraph 006 of the Green Belt PPG.

⁴⁹ ibid.

A.2 TRDC Stage 2 Parcels: Assessment Data Table

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
AL1	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
AL2	Moderate impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
AL3	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
AL4	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
AL5	Relatively limited impact	Relatively limited impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
AL6	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
AL7	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
AL8	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
AL9	Relatively significant impact	Relatively significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
BM1	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Yes
BM2	Limited to no impact	Limited to no impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
BM3	Limited to no impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
BM4	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Yes
BM5	Limited to no impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
BM6	Limited to no impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
BM7	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
BM8	Moderate impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
BM9	Relatively significant impact	Moderate impact	Significant impact	Limited to no impact	Limited to no impact	No
BW1	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
BW10	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
BW2	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
BW3	Relatively limited impact	Limited to no impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
BW4	Relatively significant impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
BW5	Moderate impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
BW6	Significant impact	Moderate impact	Significant impact	Limited to no impact	Limited to no impact	No
BW7	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	No

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
BW8	Limited to no impact	Limited to no impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
BW9	Moderate impact	Limited to no impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
CG1	Moderate impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
CG10	Relatively limited impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
CG11	Significant impact	Relatively limited impact	Significant impact	Limited to no impact	Limited to no impact	No
CG12	Significant impact	Relatively significant impact	Significant impact	Limited to no impact	Limited to no impact	No
CG2	Relatively significant impact	Relatively significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
CG3	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
CG4	Significant impact	Relatively significant impact	Significant impact	Limited to no impact	Limited to no impact	No
CG5	Moderate impact	Relatively significant impact	Moderate impact	Limited to no impact	Limited to no impact	No
CG6	Relatively limited impact	Moderate impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
CG7	Relatively significant impact	Relatively significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
CG8	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
CG9	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
CH1	Moderate impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
CH2	Relatively limited impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
CH3	Significant impact	Relatively significant impact	Significant impact	Limited to no impact	Limited to no impact	No
CH4	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Yes
CH5	Relatively limited impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
CH6	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
CH7	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
CH8	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
CH9	Moderate impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
HH1	Relatively significant impact	Relatively significant impact	Significant impact	Limited to no impact	Limited to no impact	No
HH2	Significant impact	Moderate impact	Significant impact	Limited to no impact	Limited to no impact	No
KL2	Relatively limited impact	Relatively limited impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
KL3	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
KL4	Moderate impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
KL5	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
LW1	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
LW2	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
LW3	Significant impact	Moderate impact	Significant impact	Limited to no impact	Limited to no impact	No
LW4	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
LW5	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
LW6	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
LW7	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
LW8	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
LW9	Relatively limited impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
MC1	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
MC10	Relatively significant impact	Relatively limited impact	Significant impact	Limited to no impact	Limited to no impact	No
MC11	Relatively limited impact	Relatively limited impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
MC2	Relatively limited impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
MC3	Relatively limited impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
MC4	Moderate impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
MC6	Relatively limited impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
MC7	Moderate impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
MC8	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Yes
MC9	Moderate impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
ND1	Relatively significant impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
ND10	Moderate impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes
ND11	Moderate impact	Relatively significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
ND12	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
ND2	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
ND3	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
ND4	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
ND5	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
ND6	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
ND7	Significant impact	Moderate impact	Significant impact	Limited to no impact	Limited to no impact	No
ND8	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
ND9	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
RW1	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW10	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW11	Significant impact	Moderate impact	Significant impact	Limited to no impact	Limited to no impact	No
RW12	Relatively significant impact	Relatively significant impact	Moderate impact	Limited to no impact	Limited to no impact	No
RW13	Relatively significant impact	Significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
RW14	Relatively significant impact	Moderate impact	Moderate impact	Limited to no impact	Limited to no impact	No
RW15	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW2	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW3	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW4	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW5	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW6	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Yes
RW7	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
RW8	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
RW9	Relatively limited impact	Limited to no impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
SO3	Significant impact	Moderate impact	Significant impact	Limited to no impact	Limited to no impact	No
SO4	Relatively significant impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
SO5	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
SO6	Significant impact	Significant impact	Significant impact	Limited to no impact	Limited to no impact	No
SO7	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
SO8	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Limited to no impact	Yes
SO9	Limited to no impact	Relatively limited impact	Limited to no impact	Limited to no impact	Limited to no impact	Yes
WE1	Limited to no impact	Limited to no impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
WE2	Significant impact	Relatively limited impact	Significant impact	Limited to no impact	Limited to no impact	No
WE3	Moderate impact	Relatively limited impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
WE4	Relatively limited impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
WE5	Moderate impact	Significant impact	Moderate impact	Limited to no impact	Limited to no impact	No
WE6	Moderate impact	Relatively significant impact	Moderate impact	Limited to no impact	Limited to no impact	No
WE7	Moderate impact	Relatively significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
WE8	Relatively limited impact	Relatively limited impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
WE9	Relatively significant impact	Significant impact	Significant impact	Limited to no impact	Limited to no impact	No
WN10	Moderate impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	Yes

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
WN4	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
WN5	Relatively limited impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
WN6	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
WN7	Moderate impact	Moderate impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
WN8	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
WN9	Relatively limited impact	Relatively significant impact	Relatively limited impact	Limited to no impact	Limited to no impact	No
WS1	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
WS2	Relatively limited impact	Limited to no impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
WS3	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
WS4	Relatively limited impact	Relatively limited impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
WS5	Relatively significant impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
WS6	Relatively significant impact	Significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
WS7	Relatively limited impact	Moderate impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
WW2	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
WW3	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	No
WW4	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
WW5	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
WW6	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
WW7	Relatively limited impact	Limited to no impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
WW8	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
WW9	Moderate impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes