

**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 Review<sup>1</sup> (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

<sup>1</sup> 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 as emerging conclusions from recent appeals. It concludes with the implications for this study. The full appeal reviews can be found in Appendix Aa.
- 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 sets out the approach and outcomes of a review of the Stage GBR purpose (a) assessments. The full analysis can be found in Appendix A2.
- Section 6 considers the geographical extent of the previous GBRs and whether there is a case for carrying out further assessment for new areas.
- Section 7 provisionally identifies grey belt. A summary table for the Stage 2 parcels is provided in Appendix A3.
- Section 8 provides commentary on the previous washed over village assessment.
- Section 9 provides analysis to support any future fundamentally undermine test.
- Section 10 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 alterations 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 NPPF<sup>2</sup>.

### 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 date<sup>3</sup>.

### 2.3.3 Key steps to identify grey belt land

The key steps used to identify grey belt are<sup>4</sup>:

- 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 scope<sup>5</sup>

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)<sup>6</sup>. 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.

<sup>2</sup> Paragraph: 001 Reference ID: 64-001-20250225

<sup>3</sup> Paragraph: 002 Reference ID: 64-002-20250225

<sup>4</sup> Paragraph: 003 Reference ID: 64-003-20250225

<sup>5</sup> Paragraph: 004 Reference ID: 64-004-20250225

<sup>6</sup> 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 designations. 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 assessment<sup>7</sup>.

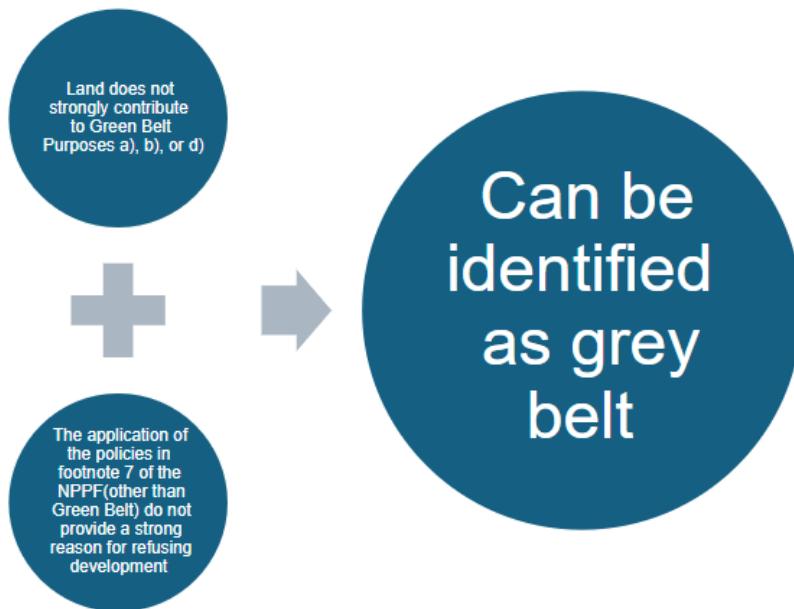
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<sup>7</sup> Paragraph: 006 Reference ID: 64-006-20250225

### 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.*”<sup>8</sup>

### 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 115<sup>9</sup>.

## 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.

<sup>8</sup> Paragraph: 008 Reference ID: 64-008-20250225

<sup>9</sup> 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.<sup>10</sup>
- 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)).<sup>11</sup>
- 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.<sup>12</sup>

Following a review of planning appeals that have been determined since the publication of the NPPF / PPG, featuring Green Belt as a main issue, including those concerning sites within Three Rivers itself, a number of key lessons have been identified:

- Where a proposed development is not inappropriate in the Green Belt, its harm to openness does not have to be given substantial weight.<sup>13</sup> The same ruling also confirmed that country parks preserve openness, providing there is not significant built development on them.
- 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 in line with NPPF paragraphs 110 and 115.
- Sustainable locations may also be defined by the status ascribed to the nearby settlement within the spatial strategy of the local authority.
- 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 regarding definitions.
- Purpose (a) only refers to the sprawl of large built-up areas (LBAs), and not towns. The definition of what constitutes an LBA is separate to the identification of towns considered for purpose (b). Providing a robust definition of an LBA and defining the extent of all LBAs relevant to the assessment is critical and should be based on empirical evidence.
- The fact that a development would create ribbon development is, additionally, not relevant to the assessment of purpose (a).
- A site plays a reduced role in restricting sprawl (purpose a) if a prominent physical feature such as a motorway is present that would act as a barrier to sprawl instead.
- Having a robust and clear definition of ‘towns’ for purpose (b) assessments is vital. This should align with how these places are defined within the development plan and its settlement hierarchy. In the absence of a settlement hierarchy, additional factors may be considered such as the scale of the settlement and the extent of its services and facilities.

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<sup>10</sup> 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

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

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

<sup>13</sup> See appeal APP/P1940/W/24/3346061 (12th May 2025)

- 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.
- 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.

## 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 Review<sup>14</sup> 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 was 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.

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<sup>14</sup> 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	<b>Sprawl</b> – spread out over a large area in an untidy or irregular way (Oxford Dictionary online). This includes <b>Ribbon development</b> 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.  <b>Large built-up areas</b> – 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.
To prevent neighbouring towns from merging	<b>Neighbouring towns</b> – 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.  <b>Merger/Coalescence</b> – the physical or visual linking of two settlements or areas of built form
To assist in safeguarding the countryside from encroachment	<b>Encroachment</b> – a gradual advance beyond usual or acceptable limits (Oxford Dictionary online). <b>The countryside</b> – open land with an absence of built development and urbanising influences, and characterised by rural land uses including agriculture and forestry.  <b>Openness</b> – absence of built development or other urbanising elements (i.e. not openness in a landscape character sense which concerns topography and woodland / hedgerow cover).
To preserve the setting and special character of historic towns	<b>Historic town</b> – 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.
To assist in urban regeneration by encouraging the recycling of derelict and other urban land.	Where development in the open countryside is likely to render previously developed land a particular vicinity less attractive to develop.

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

**Figure 3 Stage 1 GBR Assessment Criteria**

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

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 Herongate, 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 Assessment<sup>15</sup> 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 of the study due to 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 139 parcels for assessment within Three Rivers.

<sup>15</sup> 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 Chorleywood, 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 Study<sup>16</sup> 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.

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<sup>16</sup> 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.

NOTE: In line with convention at the time of the previous GBRs, the five purposes of the Green Belt as set out in the NPPF were referred to as purposes 1 to 5. For ease of understanding, and to align with current convention, the purposes will be referred to throughout this analysis as purposes (a) to (e).

### 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 the 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 NPPF Green Belt Purposes

It is also necessary to consider updated national guidance on the interpretation of the purposes, and their implementation, following the publication of updates to the 2025 PPG. The PPG provides further guidance on how purposes (a), (b) and (d) ought to be interpreted, with particular regard as to how to use them to identify grey belt. It lists illustrative features to be considered when making these judgments. Whilst these features are for the identification of grey belt, they should also be used more broadly to assess Green Belt performance as part of a GBR. The PPG does not include similar guidance for purposes (c) and (e).

#### Stage 1 GBR

Comparison between the PPG's illustrative features for the purposes and the approaches used to assess purposes within Three Rivers' Stage 1 GBR is set out in Table 1.

Overall, it is judged that despite being prepared prior to the publication of the PPG, the approach taken to assess purposes (a), (b) and (d) in the Stage 1 GBR is broadly in alignment with the latest guidance, with direct or inferred read across for all illustrative features.

**Table 1 Comparison of illustrative factors in the PPG and the approaches taken in Stage 1 Green Belt Assessment**

Purpose	PPG – Illustrative factors	Green Belt study approach
(a)	<ul style="list-style-type: none"> <li>Adjacency to large built-up area(s).</li> <li>Extent of existing development in assessment area and impact of other urbanising influences.</li> <li>Presence, or otherwise, of physical feature(s) in reasonable proximity that could restrict and contain development.</li> <li>Shape of development if released, with degree of enclosure and incongruous patterns of development considered.</li> </ul>	<p>The study applied the following criteria:</p> <ul style="list-style-type: none"> <li>Prevent the sprawl of a built-up area into open land where development would not otherwise be restricted by a permanent boundary.</li> <li>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?</li> </ul> <p>The study consistently considered the following as part of the assessment against all five NPPF purposes:</p> <ul style="list-style-type: none"> <li>Existing land uses;</li> <li>Proximity and relationship to the built-up area;</li> <li>Degree of enclosure/openness;</li> <li>Distance and visual connection to historic urban centres/key urban areas; and</li> <li>Relationship to the countryside.</li> </ul>
<b>Summary:</b> Based on the identified methodology (criteria and assessment considerations), it is judged that the illustrative factors the PPG now recommends for consideration for purpose (a), were broadly considered in the assessment process for the Stage 1 study. There is direct read across for each of the four features.		
(b)	<ul style="list-style-type: none"> <li>Location of assessment area in relation to defined towns.</li> <li>Extent of existing development in assessment area.</li> <li>Extent of the gap between towns formed by the assessment area.</li> <li>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.</li> </ul>	<p>The study applied the following criteria:</p> <ul style="list-style-type: none"> <li>Prevent development which would result in the merger or erosion of a gap (physically or visually) between settlements.</li> <li>What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?</li> </ul> <p>The study consistently considered the following as part of the assessment against all five NPPF purposes:</p> <ul style="list-style-type: none"> <li>Existing land uses;</li> <li>Proximity and relationship to the built-up area;</li> <li>Degree of enclosure/openness;</li> <li>Distance and visual connection to historic urban centres/key urban areas; and</li> <li>Relationship to the countryside.</li> </ul>
<b>Summary:</b> Based on the identified methodology (criteria and assessment considerations), it is judged that the illustrative factors the PPG now recommends for consideration for purpose (b), were broadly considered in the assessment process for the Stage 1 study. There is direct read across for each of the four features.		

Purpose	PPG – Illustrative factors	Green Belt study approach
(d)	<ul style="list-style-type: none"> <li>Extent of existing development in assessment area.</li> <li>Role that the assessment area plays in the setting of the historic town.</li> <li>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.</li> <li>Degree of separation of assessment area from the historic aspects of the town by existing development or topography.</li> </ul>	<p>The study applied the following criteria:</p> <ul style="list-style-type: none"> <li>Preserve the setting and character of historic town.</li> <li>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?</li> </ul> <p>The study consistently considered the following as part of the assessment against all five NPPF purposes:</p> <ul style="list-style-type: none"> <li>Existing land uses;</li> <li>Proximity and relationship to the built-up area;</li> <li>Degree of enclosure/openness;</li> <li>Distance and visual connection to historic urban centres/key urban areas; and</li> <li>Relationship to the countryside.</li> </ul> <p><b>Summary:</b> Based on the identified methodology (criteria and assessment considerations), it is judged that the illustrative factors the PPG now recommends for consideration for purpose (d), were broadly considered in the assessment process for the Stage 1 study. There is direct or an inferred read across for each of the four features.</p>

### Stage 2 GBR

Comparison between the PPG's illustrative features for the purposes and the approaches used to assess purposes within Three Rivers' Stage 2 GBR is set out in Table 2.

In the second column, the illustrative factors as set out in the PPG are noted. The third column summarises the approach used for the purpose assessments within the Stage 2 GBR. The final column contains a list of factors considered with the purpose assessments, identified from a review of a sample of the assessment proformas.

Overall, it is judged that despite being prepared prior to the publication of the PPG, the approach taken to assess purposes (a), (b) and (d) in the Stage 2 GBR is broadly in alignment with the latest guidance, with direct or inferred read across for all illustrative features.

**Table 2 Comparison of illustrative factors in the PPG and the approach taken in the Stage 2 Green Belt Assessment**

Purpose	PPG – Illustrative factors	Green Belt study approach	Pro forma sample review - factors considered in purpose assessments
(a)	<ul style="list-style-type: none"> <li>• Adjacency to large built-up area(s).</li> <li>• Extent of existing development in assessment area and impact of other urbanising influences.</li> <li>• Presence, or otherwise, of physical feature(s) in reasonable proximity that could restrict and contain development.</li> <li>• Shape of development if released, with degree of enclosure and incongruous patterns of development considered.</li> </ul>	<p>The methodology notes that the ‘role land plays in preventing sprawl is dependent on the extent of existing development that has occurred, the extent of urban containment and its relationship with existing large built-up area(s).’</p> <p>The methodology further states that ‘To contribute to Purpose (a), land must lie adjacent to, or in close proximity to, a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development, or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose and therefore development will have a less significant impact on this purpose. Vice versa ...’</p> <p>From the summary of approach to assessing contribution to purpose (a), it can be inferred that the assessment addressed the following:</p> <ul style="list-style-type: none"> <li>• Is the parcel adjacent to, or in close proximity to, a large built-up area?</li> <li>• Does the parcel retain a degree of openness?</li> <li>• Does the parcel contain urban development?</li> <li>• Is the parcel contained by any urban development?</li> <li>• What is the relationship between the wider countryside?</li> <li>• Is there any degree of separation from either the settlement or countryside?</li> <li>• Is the parcel distinct from the settlement/settlement edge?</li> </ul>	<ul style="list-style-type: none"> <li>• Adjacency with large built-up area</li> <li>• Level of openness</li> <li>• Nature of development within the assessment area</li> <li>• Urbanising influences within the parcel</li> <li>• Distinction from urban edge</li> <li>• Presence of physical features (e.g. motorway, A-road, woodland) which limit the role of the Green Belt / provide containment from open countryside</li> <li>• Containment of land by existing settlement edges</li> <li>• Connections to wider countryside</li> <li>• Separation from surrounding development</li> </ul>
		<p><b>Summary:</b> It is judged that the illustrative factors the PPG now recommends for consideration for purpose (a) were incorporated in the assessment process for this study. Although all the factors are not explicitly set out in the methodology, it is assumed that they were implicitly taken into account since a review of a sample of pro formas revealed references to all the factors.</p>	
(b)	<ul style="list-style-type: none"> <li>• Location of assessment area in relation to defined towns.</li> <li>• Extent of existing development in assessment area.</li> <li>• Extent of the gap between towns formed by the assessment area.</li> <li>• Degree to which the development of the assessment area would result in loss of</li> </ul>	<p>The methodology notes that ‘land that is juxtaposed between towns makes a contribution to this purpose, and the stronger the relationship between the towns – the more fragile the gap – the stronger the contribution of any intervening open land. Physical proximity is the initial consideration, but land that lacks a strong sense of openness, due to the extent of existing development that has occurred, makes a weaker contribution. This includes land that has a stronger relationship with an urban area than with countryside, due to extent of containment by development, dominance of development within an adjacent inset area, or containment by physical landscape elements. .... In addition, it is recognised that towns which are further apart may nonetheless have limited</p>	<ul style="list-style-type: none"> <li>• Relationship / adjacency to towns</li> <li>• Extent of existing development</li> <li>• Level of openness</li> <li>• Containment of land</li> <li>• Size of the gap</li> <li>• Size of the parcel in relation to the gap</li> </ul>

Purpose	PPG – Illustrative factors	Green Belt study approach	Pro forma sample review - factors considered in purpose assessments
	visual separation of towns, including whether there are any physical or natural features that might preserve visual separation.	<p>separation, particularly along connecting roads, due to the presence of smaller intervening inset area. .... Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation.'</p> <ul style="list-style-type: none"> <li>From the summary of approach to assessing contribution to purpose (b), it can be inferred that the assessment addressed the following:</li> <li>Location of assessment area in relation to defined towns.</li> <li>Physical or visual coalescence of towns</li> <li>Size of gap between towns</li> <li>Presence of physical elements to preserve separation</li> <li>Extent of existing development in assessment area.</li> </ul>	<ul style="list-style-type: none"> <li>Presence of separating features (e.g. river, topography, motorway)</li> <li>Distinction from urban edge</li> </ul>
	<p><b>Summary:</b> It is judged that the illustrative factors the PPG now recommends for consideration for purpose (b) were incorporated in the assessment process for this study. All the factors are explicitly set out in the methodology and referenced within the sample of pro formas reviewed.</p>		
(d)	<ul style="list-style-type: none"> <li>Extent of existing development in assessment area.</li> <li>Role that the assessment area plays in the setting of the historic town.</li> <li>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.</li> <li>Degree of separation of assessment area from the historic aspects of the town by existing development or topography.</li> </ul>	<p>The Stage 2 study did not identify any historic towns, therefore, did not carry out any assessment against purpose (d).</p> <p>All assessment areas were considered to make no contribution to the purpose.</p>	n/a
	<p><b>Summary:</b> The study applied a blanket 'no contribution' score across assessment areas, as no historic towns were identified. As such, it follows the latest guidance against this 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 3). Both studies stated that there were no historic towns in relation to purpose (d).

**Table 3 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 villages 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 4, 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 4 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 hierarchy<sup>17</sup> is as follows (Table 5). 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 5 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 Plan<sup>18</sup>.
- Hemel Hempstead is listed as a town in Dacorum's settlement hierarchy<sup>19</sup>.
- Bushey and Radlett are respectively identified as Tier II and Tier III key settlements in Hertsmere's settlement hierarchy<sup>20</sup>. This is assumed to be equivalent to towns as Tiers IV-V11 are specifically identified as key or other villages.
- St Albans is categorised as a city/ large town in St Albans' settlement hierarchy<sup>21</sup>.

<sup>17</sup> Three Rivers District Council (2011) Local Development Framework Core Strategy

<sup>18</sup> Watford Borough Council (2022) A Sustainable Town Watford Local Plan 2021-2038

<sup>19</sup> Dacorum Borough Council (2017) Settlement Hierarchy Study

<sup>20</sup> Hertsmere Borough Council (date unknown) Planning for Growth, Settlement hierarchy and Accessibility Mapping Analysis

<sup>21</sup> 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

- 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)<sup>22</sup>.
- Gerrards Cross is referred to as a town in the South Bucks District Local Plan (the former district area now superseded by Buckinghamshire Council)<sup>23</sup>.

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 broadly aligned with new national policy and guidance for Green Belt and therefore the studies can continue to be relied upon as part of the Local Plan evidence base. An appeal in Three Rivers in May 2025<sup>24</sup> however, raised a query as to whether one of the illustrative factors for purpose (a) set out in the Green Belt PPG had been fully considered across all the Stage 2 assessments. The factor concerned related to the ‘presence, or otherwise, of physical feature(s) in reasonable proximity that could restrict and contain development’. Therefore, for robustness a review of the purpose (a) assessments with reference to this factor is required for all Stage 2 parcels.

Beyond this Stage 2 purpose (a) review, 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

<sup>22</sup> Chiltern District Council (2011), Chiltern District Local Plan

<sup>23</sup> South Bucks District Council (2011), South Bucks District Local Plan

<sup>24</sup> [https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered\\_appeal\\_-\\_land\\_off\\_Bedmond\\_Road\\_Abbots\\_Langley.pdf](https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf)

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.

DRAFT

## 5. Review of Stage 2 GBR purpose (a) assessments

### 5.1 Scope of task

In response to a query raised through a Three Rivers appeal, as set out in section 4.7, a review of the Stage 2 GBR purpose (a) assessments was undertaken to check that they fully align with one of the illustrative factors in the Green Belt PPG, specifically the presence of physical feature(s) that could restrict and contain development.

The review focussed on the influence of physical features on purpose (a) performance only. Amendments to assessment text and scores were only made where the presence of physical features had not been fully addressed in the previous assessment, which was carried out prior to the introduction of these illustrative factors to the PPG.

### 5.2 Definition of physical features

Relevant physical features are identified as those situated on the parcel boundary or sufficiently near to the parcel boundary such that they can be deemed to represent a barrier to further sprawl beyond the parcel boundary. As such, consideration is given to whether there are prominent man-made or natural physical features that could restrict and contain development and therefore might restrict the scale of outward growth of the settlement and regularise potential development form. Physical features therefore considered for this review were:

- Motorways - All
- A-roads - dual carriageways
- Railway lines – railway lines with raised embankments, depots and any other substantial railway structure large enough to restrict the sprawl of development across it.
- Woodland - Ancient Woodland only
- Rivers / lakes – rivers and lakes large enough to restrict the sprawl of development across it.

### 5.3 Findings

The review identified that for 57 of the 139 parcels assessed in the Stage 2 GBR, there were physical features present that could restrict and contain development. Twelve parcels were judged to have taken these physical features into sufficient consideration; however, the assessments and scores were revised for 45 parcels. The review and updated scores can be found in Appendix A2.

## 6. Identification of new assessment areas

### 6.1 Scope of task

This section 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.

### 6.2 Evaluation of extent of previous assessments

TRDC used a thorough approach within its Stage 2 GBR, 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. Between the two studies, extensive coverage of the District's Green Belt was achieved in the assessments.

### 6.3 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.

### 6.4 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.

### 6.5 Summary

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

## 7. Provisional grey belt identification

### 7.1 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.

### 7.2 Grey belt scores and findings

The results of the Stage 2 GBA purposes assessment, as updated through the purpose (a) review (see section 5), 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 shown in Table 6. Thus, parcels identified within the Stage 2 GBA as not having a relatively significant or significant impact were identified as provisional grey belt.

**Table 6 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 7 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 7 Summary of grey belt land of green belt assessed in Three Rivers**

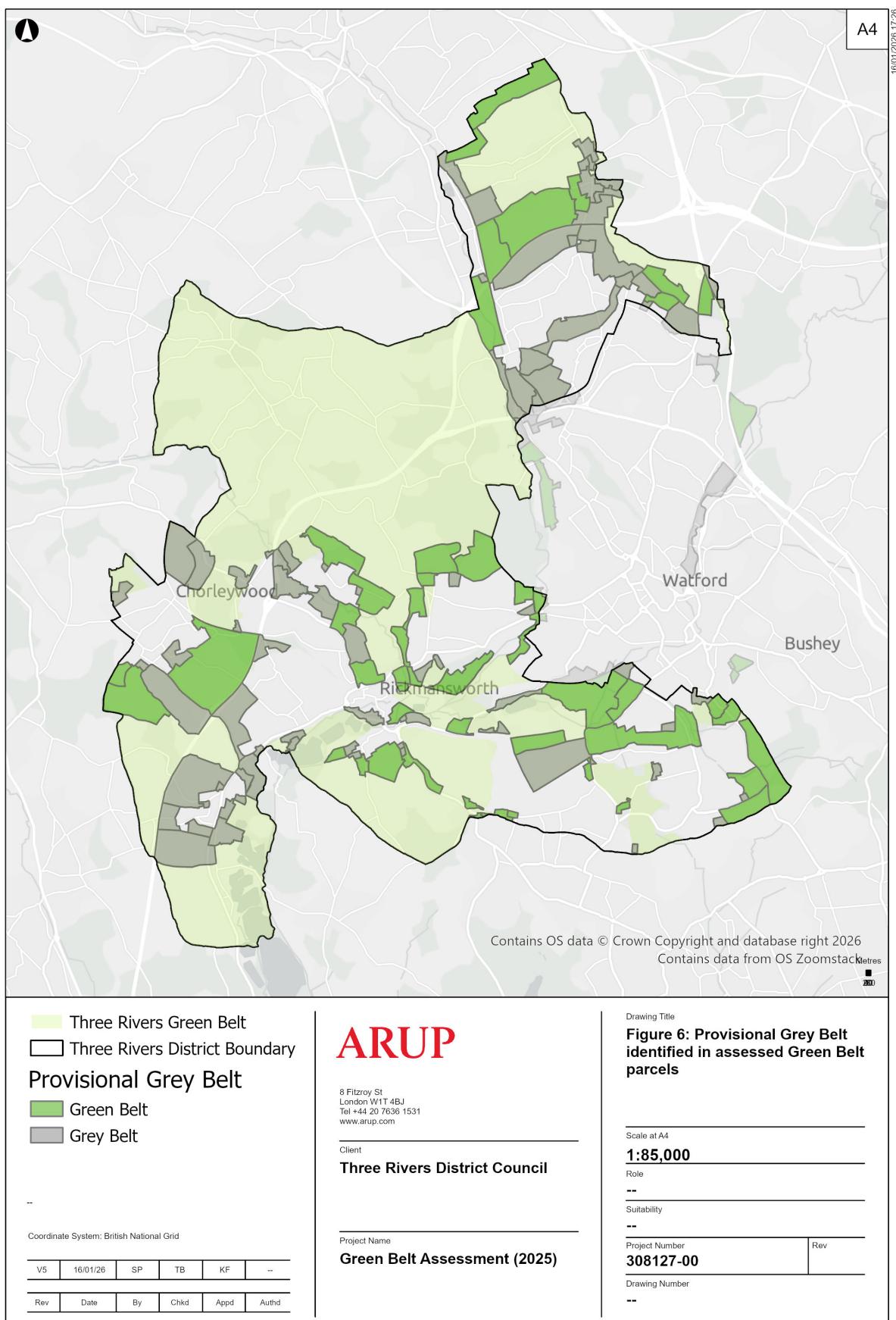
Status (Provisional)	Number of Stage 2 Green Belt parcels	% of Green Belt parcels	% of assessed Green Belt Area	Area of assessed Green Belt (Ha)
Grey belt	85	61%	48%	1,188
Non-grey belt	54	39%	53%	1,295
Total	139	100%	100%	2,483

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 Herongate, around Abbots Langley and Leavesden, on the northern edge of Chorleywood and Rickmansworth, and south of Maple Cross.

Just over 60% of the assessed parcels are provisionally deemed grey belt, equating to around 48% of the assessed Green Belt land.

Figure 6 Provisional grey belt identified in assessed Green Belt parcels



### 7.3 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:

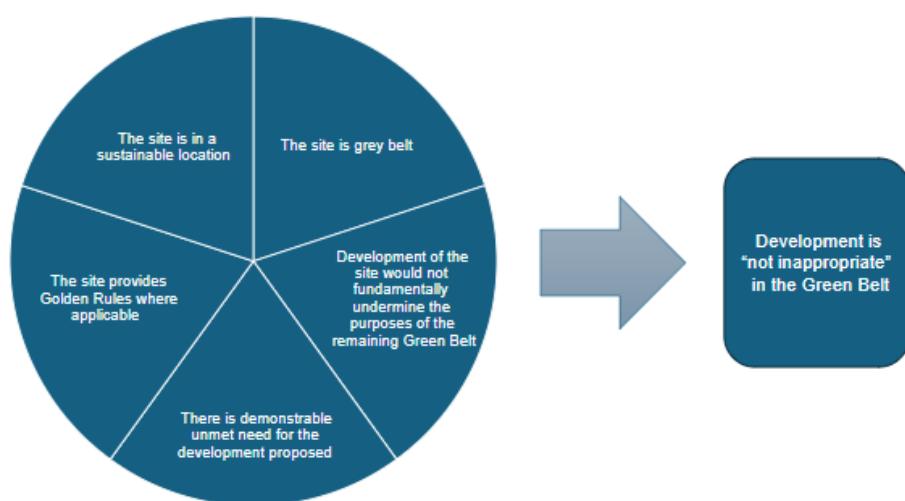
- Scheduled Monuments;
- Registered Parks and Gardens;
- Sites of Special Scientific Interest;
- Local Nature Reserves;
- Ancient Woodland;
- Common land; and
- Flood Zone 3b.

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

## 8. Washed over villages commentary

### 8.1 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.

### 8.2 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
<b>Heronsgate</b>	<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><b>DO NOT INSET</b></p>
<b>Sarratt</b>	<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><b>DO NOT INSET</b></p>
<b>Bedmond</b>	<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><b>POTENTIAL FOR INSETTING</b></p>

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

### 8.3 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.

### 8.4 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 insetting or remain washed over by the Green Belt.

#### 8.4.1 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 1993<sup>25</sup>, 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).

<sup>25</sup> 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,<sup>26</sup> 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.

#### 8.4.2 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 1969<sup>27</sup>, "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 Strategy<sup>28</sup>, 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

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<sup>26</sup> 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.

<sup>27</sup> 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>

<sup>28</sup> 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.

#### 8.4.3 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 8).

**Table 8 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.

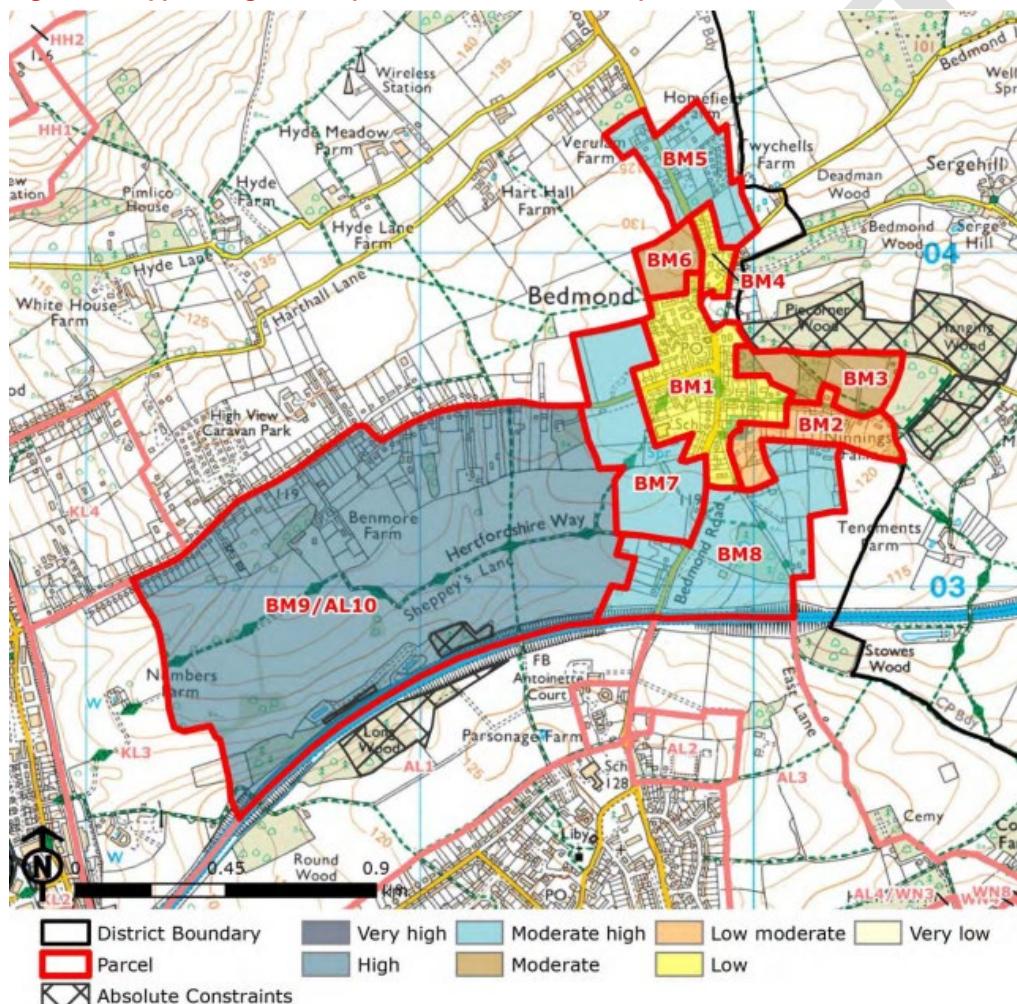
It should be noted that parcel BM1 covers the existing washed over village area, with the Stage 2 GBR suggesting this could constitute a new inset settlement. Parcel BM4 is also fully developed with there being a slight distinct from the core of the village due to tree cover but could also be part of 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 Strategy<sup>29</sup>, 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

<sup>29</sup> 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.

## 9. Fundamentally important areas

### 9.1 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.

### 9.2 Analysis

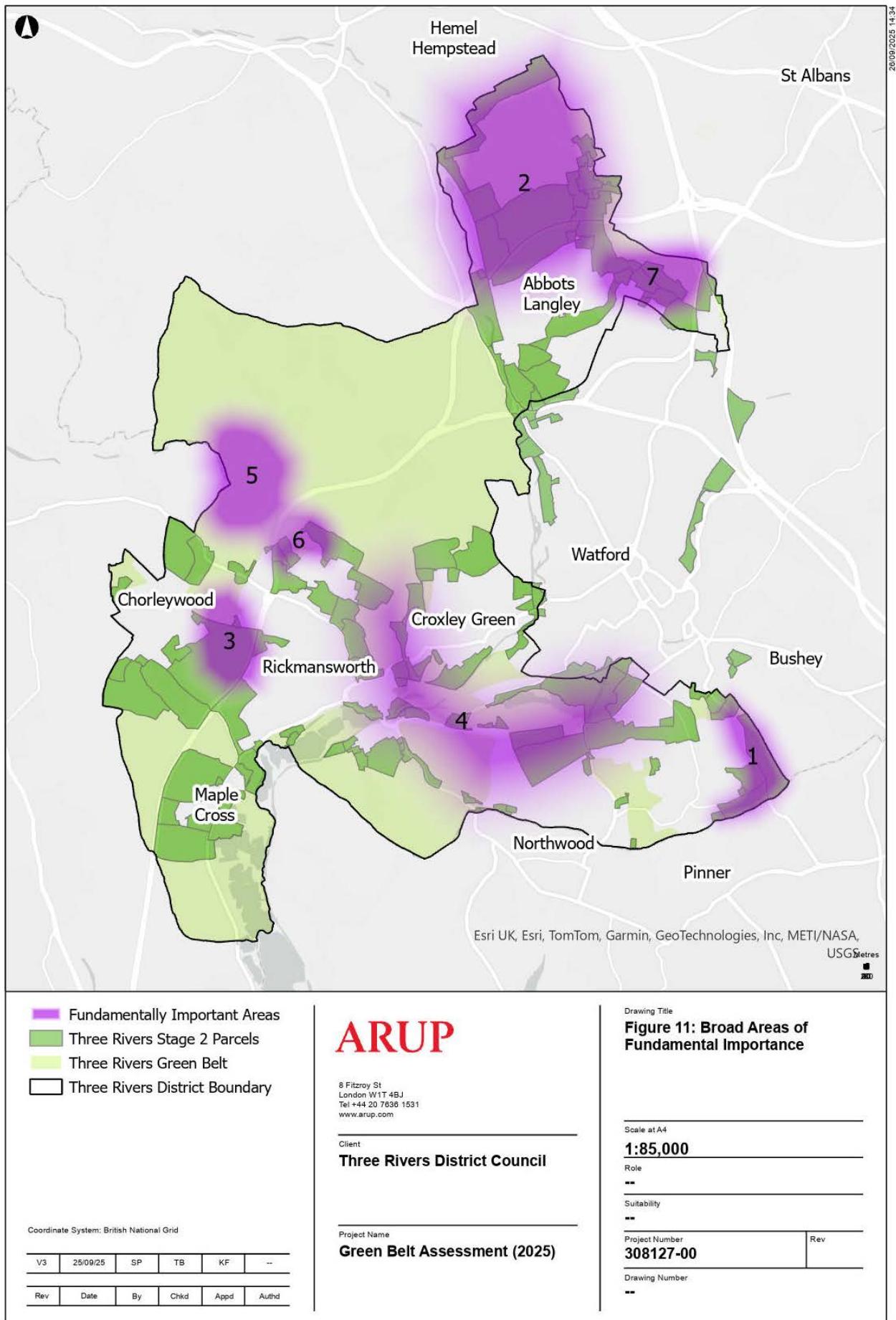
The analysis looks to identify broad areas of Green Belt within Three Rivers that are judged to be of fundamental importance to the District with regards to purposes (a) – (e).

- 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 9.

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.

Figure 11 Broad Areas of Fundamental Importance



**Table 9 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 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 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.

### 9.3 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 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.

DRAFT

# 10. Conclusions and recommendations

## 10.1 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 methodologies used in the previous GBR studies are broadly aligned with new policy and guidance as well as the latest case law. As such, assessment areas, largely, did not require re-assessment and collected data was deemed fit to be relied upon. However, for purpose (a) in response to a query raised through a Three Rivers appeal, as set out in section 4.7, a further review of the Stage 2 GBR purpose (a) assessments was undertaken to check that they fully align with one of the illustrative factors in the Green Belt PPG, specifically the presence of physical feature(s) that could restrict and contain development. As a result of this review a small

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.

## 10.2 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).

The results of the additional review in to the influence of physical features on purpose (a) scores (see above and section 4.7) are displayed in Appendix A.2. Changes to purpose (a) scores lead to 61% of parcels being deemed 'grey belt'.

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 Chorleywood 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.

### **10.3 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 Herongate and Sarratt should remain washed over within the Green Belt, and that Bedmond be considered for insetting within the Green Belt with a defined village envelope.

### **10.4 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)<sup>30</sup> 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 Rivers<sup>31</sup> and Cheshire West and Chester<sup>32</sup> 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

<sup>30</sup> [Turner v Secretary of State CLG and East Dorset Council \(2016\) EWHC 2728 \(Admin\)](#)

<sup>31</sup> [Planning Inspectorate \(2018\) Appeal Ref: APP / P1940/W/17/3183388 – Clovercourt Ltd v Three Rivers District Council](#)

<sup>32</sup> [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 State<sup>33</sup> 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 note<sup>34</sup> 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 3*<sup>35</sup> 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.’

<sup>33</sup> [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](#)

<sup>34</sup> [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](#)

<sup>35</sup> <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 (14<sup>th</sup> March 2025)<sup>36</sup> 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 (2<sup>nd</sup> April 2025)<sup>37</sup> 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 (12<sup>th</sup> May 2025),<sup>38</sup> 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 (26<sup>th</sup> February 2025)<sup>39</sup>, 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 (3<sup>rd</sup> February 2025)<sup>40</sup>. 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 (19<sup>th</sup> March 2025)<sup>41</sup> 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

<sup>36</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354630&CoID=0>

<sup>37</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3345744&CoID=0>

<sup>38</sup> [https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered\\_appeal\\_-\\_land\\_off\\_Bedmond\\_Road\\_Abbots\\_Langley.pdf](https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf)

<sup>39</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0>

<sup>40</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3342701&CoID=0>

<sup>41</sup> <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 (12<sup>th</sup> May 2025),<sup>42</sup> within Three Rivers District, builds on this principle. Baroness Taylor took into 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 (26<sup>th</sup> Feb 2025)<sup>43</sup> 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 (26<sup>th</sup> Mar 2025)<sup>44</sup> 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 (12<sup>th</sup> March 2025)<sup>45</sup>, 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 (13<sup>th</sup> February 2025)<sup>46</sup> 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

<sup>42</sup> [https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered\\_appeal\\_-\\_land\\_off\\_Bedmond\\_Road\\_Abbots\\_Langley.pdf](https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf)

<sup>43</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354290&CoID=0>

<sup>44</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3342877&CoID=0>

<sup>45</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3347530&CoID=0>

<sup>46</sup> <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 (31<sup>st</sup> March 2025)<sup>47</sup>, 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 (15<sup>th</sup> 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.

Finally, the data centre appeal at Abbots Langley, APP/P1940/W/24/3346061 (12<sup>th</sup> May 2025),<sup>48</sup> identified that its parcel was well contained by the M25 motorway to its north and the small areas of previously developed land on the appeal site and as such could not be deemed as contributing strongly to purpose (a). It therefore reaffirmed that physical features, in this case motorways, that could be deemed to be containing sprawl beyond the settlement in the event of development, must be considered in the assessment against purpose (a) in line with the illustrative factors set out in the PPG. This, therefore, would affect the eventual determination of whether parcels and sites can be deemed grey belt or not.

### **A.1.5 Scale, granularity and proportionality of assessment parcels**

In determining a series of six appeals – APP/H1515/W/24/3341474-79 (16<sup>th</sup> Jan 2025)<sup>49</sup> – 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 (13<sup>th</sup> Feb 2025)<sup>50</sup> – 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

<sup>47</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3354266&CoID=0>

<sup>48</sup> [https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered\\_appeal\\_-\\_land\\_off\\_Bedmond\\_Road\\_Abbots\\_Langley.pdf](https://assets.publishing.service.gov.uk/media/6821f977c66deec8488f7f42/Recovered_appeal_-_land_off_Bedmond_Road_Abbots_Langley.pdf)

<sup>49</sup> <https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=60702043>

<sup>50</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3347410&CoID=0>

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/24/3345435<sup>51</sup> (5<sup>th</sup> 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.

### **A.1.6 Footnote 7 land**

A further lesson to be drawn from the Wrotham appeal – APP/H2265/W/24/3347410 (13<sup>th</sup> Feb 2025)<sup>52</sup> – 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.

In appeal APP/C3430/W/25/3363067 (13th November 2025) the Inspector concluded that grey belt is an assessment of the land itself, rather than of the proposed development. The Inspector agreed with the Council's position that the presence of the Grade II listed Church of St John (which is outside but very close to the site's boundary) represents a strong restriction on development. This was considered in line with the NPPFs definition of grey belt, being “‘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, Annex 2: Glossary). Therefore, the proposed development would not be grey belt. However, noting that all parties agreed that the heritage harm would not be a strong reason for refusal in this instance.

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<sup>51</sup> <https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3345435>

<sup>52</sup> ibid.

## A.2 Stage 2 purpose (a) review

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
CG8	The parcel is adjacent to the edge of Croxley Green which is contiguous with the large built up area of Greater London. The boundary with the urban edge (along Little Green Lane) provides some distinction from urbanising uses, giving the parcel a significant role in preventing urban sprawl.	Significant impact	The parcel is adjacent to the edge of Croxley Green which is contiguous with the large built up area of Greater London. The boundary with the urban edge (along Little Green Lane) provides some distinction from urbanising uses, giving the parcel a role in preventing urban sprawl. However, the parcel is contained by Whippendell Woods to the north-west which would prevent further sprawl in this direction limiting the parcel's role in containing urban sprawl.	Relatively significant impact
CG9	The parcel lies adjacent to the edge of the large built up area of Greater London and is uncontained countryside. Little Green Lane creates some limited distinction from the inset edge, giving it a significant role in preventing sprawl.	Significant impact	The parcel lies adjacent to the edge of the large built up area of Greater London and is uncontained countryside. Whippendell Woods lies to the north-east, potentially preventing further sprawl. Little Green Lane creates some limited distinction from the inset edge, giving the parcel a relatively significant role in preventing sprawl.	Relatively significant impact
CG10	The parcel is adjacent to the edge of Croxley Green which is contiguous with the large built up area of Greater London. However it is contained on three sides by the inset settlement edge, which limits its role in preventing urban sprawl.	Relatively limited impact	N/A	N/A
AL1	The parcel lies adjacent to the urban edge of Abbots Langley which is contiguous with the large built up area of Greater London. It has strong openness and well-treed back gardens provide some distinction from the urban edge, giving it a relatively significant role in preventing urban sprawl. The presence of the motorway and woodland has a containing effect that limits this role to a degree.	Relatively significant impact	The parcel lies adjacent to the urban edge of Abbots Langley which is contiguous with the large built up area of Greater London. It has strong openness and well-treed back gardens providing some distinction from the urban edge, helping to prevent urban sprawl. The presence of the M25 motorway and, to a much lesser extent, ancient woodland has a significant containing effect that would prevent further sprawl were the parcel to be developed and therefore limits the role of the parcel in preventing urban sprawl.	Moderate impact
AL2	The parcel lies adjacent to the urban edge of Abbots Langley which forms part of the Greater London large built up area. Despite the low density development, its character is distinct from the urban area, with tree cover providing distinction along the urban edge. There is a limited degree of containment of the land by the surrounding settlement edges.	Moderate impact	N/A	N/A
AL3	The parcel is adjacent to the urban edge of Abbots Langley which is contiguous with the large built up area of Greater London. It is generally uncontained by urbanising uses but has limited distinction from the urban edge.	Relatively significant impact	The parcel is adjacent to the urban edge of Abbots Langley which is contiguous with the large built up area of Greater London. It has limited distinction from the urban edge. It is contained on its northern boundary by the M25 motorway, which would prevent further sprawl in this direction if the parcel was to be developed. However, open countryside on its eastern boundary would allow for significant further development, increasing the role played by the parcel.	Moderate impact
AL4	The parcel lies adjacent to the edge of Abbots Langley and Leavesden (contiguous with Watford) which form part of the	Moderate impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	large built up area. It is only partially developed with a healthcare complex, leaving significant areas of open land. It has a connection with the wider countryside to the east but a weak sense of distinction from the urban edge.			
AL5	The parcel lies adjacent to the urban edges of Abbots Langley and Leavesden (contiguous with Watford) which form part of the large built up area. The extent of urban containment to the north and south limits the extent to which development here would be considered sprawl.	Relatively limited impact	N/A	N/A
AL6	The parcel is adjacent to the urban edge of Abbots Langley which forms part of the large built up area of Greater London. There are some urbanising influences within the parcel due to the presence of the hotel complex and this has separation from the inset edges. The land is partially contained by urban development, however an area of woodland in the south east corner creates some distinction from the adjacent film studio development.	Moderate impact	The parcel is adjacent to the urban edge of Abbots Langley which forms part of the large built up area of Greater London. There are some urbanising influences within the parcel due to the presence of the hotel complex and this has separation from the inset edges. The land is partially contained by urban development, however an area of ancient woodland in the south east corner creates some distinction from the adjacent film studio development. Beyond the woodland is a railway line. Development has already spread beyond the line. The A41 is in close proximity, running parallel, to the railway line. This would likely serve as a barrier to further development sprawl beyond the railway line.	Relatively limited impact
AL7	The parcel is adjacent to the urban edge of Abbots Langley which forms part of the large built up area. The parcel is free of urbanising influences. Development to the north and south has some containing influence, but is offset by the association with the valley landform, which together with the railway and the A41 creates some separation.	Relatively significant impact	The parcel is adjacent to the urban edge of Abbots Langley which forms part of the large built up area. The parcel is free of urbanising influences. Development to the north and south has some containing influence, but is offset by the association with the valley landform, which together with the railway and the A41 creates some separation. The A41 represents an obstacle to further sprawl to the west and south, away from the settlement, reducing the role played by the parcel.	Limited to no impact
AL8	The parcel is in part adjacent to the urban edge of the Greater London large built up area, however its relationship with the inset areas is weak. The parcel contains considerable urbanising development, which limits its contribution to preventing sprawl.	Moderate impact	N/A	N/A
AL9	The parcel is adjacent to the urban edge of the Greater London large built up area and contains only minimal urbanising uses, giving it relatively strong openness. It is clearly separated from the inset edge to the east but is more weakly distinguished in the south from the edge of the settlement of Hunton Bridge. The A41 also creates a sense of containment from the open countryside to the west.	Relatively significant impact	The parcel is adjacent to the urban edge of the Greater London large built up area and contains only minimal urbanising uses, giving it relatively strong openness. It is clearly separated from the inset edge to the east but is more weakly distinguished in the south from the edge of the settlement of Hunton Bridge. The M25 near the parcel's north-west and south-west boundary, would limit further sprawl, reducing the parcel's role in preventing urban sprawl.	Relatively limited impact

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
AL10	Abbots Langley to the south and Kings Langley to the east have very little separation, and Abbots Langley likewise has very little separation from North Watford and in turn the wider large built-up area of Greater London. There is insufficient separation for development in the parcel not to be associated with the large built-up area, and strong separating features – the railway line and valley side to the west and the M25 to the south – increase the extent to which development here would constitute sprawl, but urbanising development along Tom's Lane has some containing influence.	Relatively significant impact	Abbots Langley to the south and Kings Langley to the east have very little separation, and Abbots Langley likewise has very little separation from North Watford and in turn the wider large built-up area of Greater London. There is insufficient separation for development in the parcel not to be associated with the large built-up area. Additionally, the railway line and valley side to the west and the M25 to the south limit the extent to which the parcel would contain urban sprawl. The M1 motorway further east, given its distance from the edge of the settlement, outward growth to this feature would result in significant and disproportionate sprawl of the large built-up area. Urbanising development along Tom's Lane also has some containing influence.	Relatively limited impact
BW1	Batchworth is close enough to more contiguous urban development to the north at Rickmansworth to be considered to constitute part of the large built-up area extending out from Greater London. Whilst the parcel is largely open in the west, it has a close association with the inset settlement edge, which contains the parcel to the south and west. The land is contained by the existing Hampton Hall Mooring with associated building and car park in the east, limiting the extent to which development would be considered sprawl of the large built up area.	Moderate impact	Batchworth is close enough to more contiguous urban development to the north at Rickmansworth to be considered to constitute part of the large built-up area extending out from Greater London. Whilst the parcel is largely open in the west, it has a close association with the inset settlement edge, which contains the parcel to the south and west. The land is contained by the existing Hampton Hall Mooring with associated building and car park in the east, limiting the extent to which development would be considered sprawl of the large built up area. Additionally, the River Chess and associated lakes further to the north limit any role the parcel would have in preventing sprawl.	Relatively limited impact
BW2	Batchworth is close enough to more contiguous urban development to the north to be considered to constitute part of the large built-up area extending out from Greater London. Whilst the parcel has some association with inset development, which contains the parcel to the south and southwest, and the parcel is contained by the existing Hampton Hall Mooring with associated building and car park to the northwest, the parcel is open and the A4145 and a woodland band provide distinction from inset development to the south.	Relatively significant impact	Batchworth is close enough to more contiguous urban development to the north to be considered to constitute part of the large built-up area extending out from Greater London. Whilst the parcel has some association with inset development, which contains the parcel to the south and southwest, and the parcel is contained by the existing Hampton Hall Mooring with associated building and car park to the northwest, the parcel is open and the A4145 and a woodland band provide distinction from inset development to the south. Additionally, the River Chess and associated lakes on its northern boundary limit the role the parcel would have in preventing sprawl.	Moderate impact
BW3	Batchworth is close enough to more contiguous urban development to the north to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is partially open and, due to the presence of the dwellings occupying the parcel, the parcel is strongly associated with the adjoining inset development to the north, limiting the extent to which development would be considered sprawl of the large built up area.	Relatively limited impact	N/A	N/A
BW4	Batchworth is close enough to more contiguous urban development to the north at Rickmansworth to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is partially open and the tree cover to	Relatively significant impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	the west of the A404, open field to the west of the A404 (north of Batchworth Park Golf Club) and the sloping nature of the parcel extending up rising land linearly from the edge of the inset settlement of Batchworth creates distinction from the settlement, which is located on lower ground. The linear parcel is largely uncontained and potentially denser development within it would be considered sprawl of the large built up area.			
<b>BW5</b>	Batchworth is close enough to more contiguous urban development to the north to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open and undeveloped, with a limited separation from the inset settlement edge of Batchworth. However, the loosely dispersed large dwellings to the north, south and east create a degree of containment, limiting the extent to which development would be considered sprawl of the large built up area.	Moderate impact	N/A	N/A
<b>BW6</b>	Batchworth is close enough to more contiguous urban development to the north to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open and any containment from washed-over development to the east and west is predominantly limited by the presence of woodland and tree lines. The sloping nature of the parcel extending up rising land from the edge of the inset settlement of Batchworth creates distinction from the settlement, which is located on lower ground. Development would therefore be considered sprawl of the large built up area.	Significant impact	N/A	N/A
<b>BW7</b>	Batchworth is close enough to more contiguous urban development to the north to be considered to constitute part of the large built-up area extending out from Greater London. Although washed-over development to the north of the parcel and in the south and east of the parcel has some minor containing influence, the parcel is predominantly open and a tree block creates some distinction from the inset settlement edge of Batchworth along Harefield Road. Therefore, development would be considered sprawl of the large built up area.	Relatively significant impact	N/A	N/A
<b>BW8</b>	Batchworth is close enough to more contiguous urban development to the north to be considered to constitute part of the large built-up area extending out from Greater London. As the parcel is partially contained by development within the inset settlement edge of Batchworth, it has a close association with the inset settlement. In addition the parcel contains existing	Limited to no impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	development. Therefore, the extent to which release of the parcel would be considered sprawl of the large built up area is limited.			
<b>BW9</b>	Batchworth is close enough to more contiguous urban development to the north at Rickmansworth to be considered to constitute part of the large built-up area extending out from Greater London. Although the parcel is open, it is contained on two sides by existing development and is closely associated with the inset settlement edge of Batchworth, limiting the extent to which development would be considered sprawl of the large built up area.	Moderate impact	N/A	N/A
<b>BW10</b>	Batchworth is close enough to more contiguous urban development to the north at Rickmansworth to be considered to constitute part of the large built-up area extending out from Greater London. The parcels are open and with the exception of land within BW9, the open grassland is largely uncontained. Development would therefore be considered sprawl of the large built up area.	Relatively significant impact	Batchworth is close enough to more contiguous urban development to the north at Rickmansworth to be considered to constitute part of the large built-up area extending out from Greater London. The parcels are open and with the exception of land within BW9, the open grassland is largely uncontained. Development would therefore be considered sprawl of the large built up area. However, the Bury Lake and Stocker's Lake near to northern and north-western boundary, limit the possibility of development sprawl to the north and east, limiting the role of the parcel, although no such barriers to development to the south exist.	Relatively significant impact
<b>BM1</b>	The parcel is already fully developed so the parcel plays no role in preventing urban sprawl.	Limited to no impact	N/A	N/A
<b>BM2</b>	The parcel lies adjacent to Bedmond which does not form part of the large built up area.	Limited to no impact	N/A	N/A
<b>BM3</b>	The parcel lies adjacent to Bedmond which does not form part of the large built up area	Limited to no impact	N/A	N/A
<b>BM4</b>	The parcel lies adjacent to Bedmond which does not form part of the large built up area	Limited to no impact	N/A	N/A
<b>BM5</b>	The parcel lies adjacent to Bedmond which does not form part of the large built up area	Limited to no impact	N/A	N/A
<b>BM6</b>	The parcel lies adjacent to Bedmond which does not form part of the large built up area.	Limited to no impact	N/A	N/A
<b>BM7</b>	The parcel has relatively strong openness due to minimal urbanising uses, despite relatively weak distinction from the urban edge. While Bedmond itself is not part of the large built up area, the land here plays an important role in separating the urbanising uses to the east from the linear sprawl along Tom's Lane to the	Relatively significant impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	west, which links Bedmond with the nearby settlement of Kings Langley.			
<b>BM8</b>	The parcel is adjacent to the settlement edge of Bedmond, has strong openness, and is somewhat distinguished from urbanising uses by tree cover. While Bedmond is not part of the large built up area, this release would reduce the gap between Bedmond and Abbots Langley to the south, which does form part of the large built up area, and therefore the parcel does make some contribution to preventing sprawl.	Moderate impact	The parcel is adjacent to the settlement edge of Bedmond, has strong openness, and is somewhat distinguished from urbanising uses by tree cover. While Bedmond is not part of the large built up area, this release would reduce the gap between Bedmond and Abbots Langley to the south, which does form part of the large built up area, and therefore the parcel does make some contribution to preventing sprawl. However, as the M25 motorway separates the parcel from Abbots Langley, immediately at its southern boundary, the parcel makes only a limited contribution to preventing sprawl.	Relatively limited impact
<b>BM9</b>	While Bedmond itself is not part of the large built up area, the land here plays an important role in separating the urbanising uses to the east from the linear sprawl along Tom's Lane to the north, which links Bedmond with the nearby settlement of Kings Langley to the east. Kings Langley and Abbots Langley to the south have very little separation, and Abbots Langley likewise has very little separation from North Watford and in turn the wider large built-up area of Greater London. There is insufficient separation for development in the parcel not to be associated with the large built-up area.	Relatively significant impact	Abbots Langley to the south and Kings Langley to the east have very little separation, and Abbots Langley likewise has very little separation from North Watford and in turn the wider large built-up area of Greater London. There is insufficient separation for development in the parcel not to be associated with the large built-up area. Additionally, the railway line and valley side to the west and the M25 to the south limit the extent to which the parcel would contain urban sprawl. The M1 motorway further east, given its distance from the edge of the settlement, outward growth to this feature would result in significant and disproportionate sprawl of the large built-up area. Urbanising development along Tom's Lane also has some containing influence.	Relatively significant impact
<b>CH1</b>	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. The washed-over development to the east has some limited containing influence, and there is no significant distinction between the urban area and the parcel, but this area is largely open land rising away from the settlement edge. Therefore development would be considered sprawl of the large built up area.	Moderate impact	N/A	N/A
<b>CH2</b>	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. Existing washed-over development within the parcel limits the extent to which its release would constitute increased sprawl of the large built up area, but the housing is low density with extensive tree cover and so retains a sense of distinction from most of the inset urban area.	Relatively limited impact	N/A	Relatively limited impact
<b>CH3</b>	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. The parcel	Significant impact	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. The parcel contains little urbanising development and,	Moderate impact

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	contains little urbanising development and, although it abuts inset development at Chorleywood and Rickmansworth and washed-over development at Herongate, it is a large enough area to lack any significant sense of containment. Tree cover limits intervisibility with built development. Release would therefore be considered significant sprawl of the large built up area.		although it abuts inset development at Chorleywood and Rickmansworth and washed-over development at Herongate, it is a large enough area to lack any significant sense of containment. Tree cover limits intervisibility with built development. Release would therefore be considered significant sprawl of the large built up area. However, the presence of the M25 motorway on its eastern boundary would prevent any further sprawl in this direction, limiting the role this parcel plays in preventing further development sprawl.	
<b>CH4</b>	Urbanising development in and around the sub-area, and tree cover to create distinction from the wider Green belt, limit the extent to which development would be considered sprawl of the large built-up area.	Limited to no impact	N/A	N/A
<b>CH5</b>	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London, but the close association between this parcel and the urban fringe limits the extent to which development would be considered sprawl of the large built up area.	Relatively limited impact	N/A	N/A
<b>CH6</b>	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. Landform and land cover distinction between the parcel and the inset area mean that intensified development resulting from Green Belt release would constitute sprawl, but existing development within the parcel limits the extent to which its contribution would be affected.	Moderate impact	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. Landform and land cover distinction between the parcel and the inset area mean that intensified development resulting from Green Belt release would constitute sprawl, but existing development within the parcel limits the extent to which its contribution would be affected. Additionally, development to the south of the parcel would be prevented by the presence of the M25 motorway on the parcel's southern boundary. However, there are no such barriers to sprawl on potential development to the east and west.	Moderate impact
<b>CH7</b>	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open and undeveloped, with no sense of containment from the wider Green Belt. Therefore release of the parcel would constitute significant urban sprawl.	Significant impact	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open and undeveloped. Therefore release of the parcel would constitute significant urban sprawl. However, ancient woodland on its western boundary would serve to restrict sprawl to the west of the parcel, limiting the role the parcel plays in preventing sprawl.	Relatively significant impact
<b>CH8</b>	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open and undeveloped, with no sense of containment from the wider Green Belt. Therefore release of the parcel would constitute significant urban sprawl.	Significant impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
CH9	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. This is open countryside, but the extent to which development here would be considered sprawl is limited by the absence of a strong settlement edge boundary and by the parcel's containment by ancient woodland to the north and east.	Moderate impact	Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. This is open countryside, but the extent to which development here would be considered sprawl is limited by the absence of a strong settlement edge boundary and by the parcel's containment by ancient woodland to the north and east which would serve to prevent further development to the north and east were the parcel to be developed.	Moderate impact
CG1	The parcel is adjacent to Croxley Green which is contiguous with the large built up area of Greater London. The parcel is contained by the settlement edge to the north and east, limiting the extent to which development would be considered as sprawl of the large built up area, but is more open toward the west and south.	Moderate impact	The parcel is adjacent to Croxley Green which is contiguous with the large built up area of Greater London. The parcel is contained by the settlement edge to the north, limiting the extent to which development would be considered as sprawl of the large built up area. Ancient woodland to the east, a railway line and river to the south would all serve to prevent the spread of development, limiting the role this parcel plays in preventing sprawl.	Relatively limited impact
CG2	The parcel is adjacent to Croxley Green which is contiguous with the large built up area of Greater London, and sloping ground of the Chess River Valley creates some distinction from the settlement edge of Croxley Green. A limited area of washed over development creates some degree of containment to the west.	Relatively significant impact	The parcel is adjacent to Croxley Green which is contiguous with the large built up area of Greater London, and sloping ground of the Chess River Valley creates some distinction from the settlement edge of Croxley Green. A limited area of washed over development creates some degree of containment to the west. An ancient woodland to the east, railway line on the southern boundary and a further river to the south as well as a river on the western boundary prevent development sprawl in these directions, reducing the role that this parcel plays in checking the unrestricted sprawl of the large built-up area.	Relatively limited impact
CG3	The parcel is adjacent to Croxley Green which is contiguous with the large built up area of Greater London. While the land itself is free of urbanising uses, its significant containment by woodland and the settlement edges that surround it create a strong association with the urban area. This association is strengthened by the lack of distinction from the urban edge on its boundaries.	Moderate impact	The parcel is adjacent to Croxley Green which is contiguous with the large built up area of Greater London. While the land itself is free of urbanising uses, its significant containment by woodland and the settlement edges that surround it create a strong association with the urban area. This association is strengthened by the lack of distinction from the urban edge on its boundaries. Additionally, ancient woodland on its boundary and a railway line near to its southern boundary would prevent development sprawl, limiting the role played by this parcel.	Limited to no impact
CG4	The parcel is adjacent to Croxley Green which is contiguous with the large built up area of Greater London. Woodland within the parcel creates a strong sense of distinction from the urban edge. Together with the presence of the canal, it serves as a strong barrier to sprawl into the open Green Belt land beyond the river to the south and east.	Significant impact	The parcel is adjacent to Croxley Green which is contiguous with the large built up area of Greater London. Together with the presence of the canal, it serves as a strong barrier to sprawl into the open Green Belt land beyond the river to the south and east. Woodland within the parcel creates a strong sense of distinction from the urban edge. The Canal However, the railway line on its southern boundary and railway line and ancient woodland on its north-western boundary would serve to restrict the sprawl of the built-up area were this parcel to be developed, limiting the role played by the parcel	Relatively limited impact
CG5	The parcel lies adjacent to the edge of Croxley Green which is contiguous with the large built up area of Greater London and the	Moderate impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	tree cover creates some distinction from the urbanising influences, however the strength of containment by the existing urban area limits its contribution to preventing sprawl.			
CG6	The parcel is adjacent to the edge of Croxley Green which is contiguous with the large built up area of Greater London. The trees within the parcel and the A412 create some distinction from the urban edge of Croxley Green, however the degree of urbanising influences (due to housing and office development within the parcel) compromise openness. In addition, urban containment to the north and the influence of the main road to the south limits the parcel's contribution to preventing urban sprawl.	Relatively limited impact	N/A	N/A
CG7	The parcel is adjacent to the edge of Croxley Green which is contiguous with the large built up area of Greater London. While the constrained land (at the golf course) to the north and the inset area to the south already limit the potential for sprawl here, the elevated landform and woodland block within the parcel create a sense of distinction from the inset settlement and contribute to preventing sprawl.	Relatively significant impact	N/A	N/A
CG11	The parcel lies adjacent to the edge of Croxley Green which is contiguous with the large built up area of Greater London and has strong openness. Its association with the inset settlement edge to the east is limited by The Green and by well-treed boundaries. Existing development within the parcel is very low density and is not urban in character.	Significant impact	N/A	N/A
CG12	The parcel lies adjacent to the urban edge of Croxley Green which is contiguous with the large built up area of Greater London. Despite backing onto residential gardens, the sloping land down to the River Chess (which forms part of the wider Green Belt valley) provides some distinction from the inset edge and therefore the land makes a significant contribution to preventing urban sprawl.	Significant impact	N/A	N/A
HH1	The parcel is subject to some containment from washed over development to the west at Nash Mills however, there is significant landform distinction from the inset settlement edge of Hemel Hempstead, which runs along the valley floor, to which the extent of tree cover adds further separation. Although Abbots Hill School (which lies between the parcel and the inset settlement edge) has development it lacks any relationship with the urban area and is not significantly urbanising in character. There is also	Relatively significant impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	a relatively strong belt of trees between the school and land in the parcel, therefore development in the parcel would constitute sprawl of the large built up area of Hemel Hempstead.			
<b>HH2</b>	The parcel is uncontained, open and undeveloped and has significant landform distinction from the inset settlement edge of Hemel Hempstead which runs along a valley floor. The extent of tree cover to the northwest adds further separation from the urban area.	Significant impact	N/A	N/A
<b>KL1</b>	The parcel comprises of relatively open land with minimal urbanising influences, but has only limited distinction (provided by tree cover) from the inset edge to the north. The inset edge of Abbots Langley to the east has some containing influence, limiting the land's role in preventing sprawl, however this is limited by tree cover along the railway line.	Relatively significant impact	The parcel comprises of relatively open land with minimal urbanising influences, but has only limited distinction (provided by tree cover) from the inset edge to the north. The inset edge of Abbots Langley to the east has some containing influence, limiting the land's role in preventing sprawl, however this is limited by tree cover along the railway line. The M25 near the parcel's north-west and south-west boundary, would limit further sprawl, reducing the parcel's role in preventing urban sprawl.	Relatively limited impact
<b>KL2</b>	The parcel is adjacent to the urban edge of the Greater London large built up area. Existing development within the parcel has some urbanising influence but is only partial and thus has only a minor impact on openness. However due to the land's containment by the M25 to the south, railway line to the east and development to the north, the land has a stronger relationship with the inset settlement edge than the wider countryside, limiting its role in preventing sprawl.	Relatively limited impact	The parcel is adjacent to the urban edge of the Greater London large built up area. Existing development within the parcel has some urbanising influence but is only partial and thus has only a minor impact on openness. However due to the land's containment by the M25 to the south, railway line to the east and development to the north, the land has a stronger relationship with the inset settlement edge than the wider countryside, limiting its role in preventing sprawl.	Relatively limited impact
<b>KL3</b>	The parcel lies adjacent to the urban edge of the Greater London built-up area and contains minimal urbanising uses, leaving large areas of open land. The railway line to on the western boundary provides a strong and relatively consistent distinction from the urban edge, and has only been partially breached by small scale office and industrial development. While both the urbanising linear sprawl to the north and the motorway to the south have some containing effects, the sloping valley side and strong valley floor creates separation from urbanising uses and helps retain visual association with the wider countryside.	Relatively significant impact	The parcel lies adjacent to the urban edge of the Greater London built-up area and contains minimal urbanising uses, leaving large areas of open land. The railway line to on the western boundary provides a strong and relatively consistent distinction from the urban edge, and has only been partially breached by small scale office and industrial development. While both the urbanising linear sprawl to the north and the motorway to the south have some containing effects, the sloping valley side and strong valley floor creates separation from urbanising uses and helps retain visual association with the wider countryside. The M25 motorway on its southern boundary restricts development in this direction, limiting the role of the parcel in preventing sprawl to the south only.	Relatively significant impact
<b>KL4</b>	The parcel lies adjacent to the urban edge of Kings Langley and the railway line provides strong distinction from the urban edge. However the existing extent of linear sprawl along Tom's Lane and Harthall Lane limits the parcel's role in preventing urban sprawl.	Moderate impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
<b>KL5</b>	The parcel lies adjacent to the urban edge of Kings Langley and the railway line provides strong distinction from urbanising uses to the west, however the extent of existing urbanising development within the parcel limits its role in preventing sprawl.	Moderate impact	N/A	N/A
<b>LW1</b>	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open but is partially contained by development to the north (Loudwater) and to the south east by the Royal Masonic School for Girls.	Relatively significant impact	N/A	N/A
<b>LW2</b>	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. Whilst the parcel is contained by development on three edges, the land is predominately open with the exception of a few residential properties. Extensive tree cover retains a reasonably strong sense of distinction from the inset area.	Moderate impact	N/A	N/A
<b>LW3</b>	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open, uncontained and largely undeveloped with limited distinction from the inset settlement edge of Loudwater. Therefore, development would be considered sprawl of the large built up area	Significant impact	N/A	N/A
<b>LW4</b>	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. Whilst the parcel is largely open, it has a close association with the inset settlement edge, which contains the parcel to the south and west, and the land is contained by the existing residential dwellings to the north and northeast, limiting the extent to which development would be considered sprawl of the large built up area.	Moderate impact	N/A	N/A
<b>LW5</b>	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open, largely undeveloped and has a strong sense of distinction from the urban edge by woodland within the south of the parcel. With the exception of Miclefield Hall to the north, the parcel is	Significant impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	predominantly uncontained. Therefore, development would be considered sprawl of the large built up area.			
LW6	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. Whilst the parcel is largely open and the tree-lined Sarratt Lane provides some sense of distinction from the urban edge, the parcel has a close association with the inset settlement edge, which contains the parcel to the south, east and west, limiting the extent to which development would be considered sprawl of the large built up area.	Moderate impact	N/A	N/A
LW7	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. Although the residential development within Loudwater to the southeast, and washed over residential dwellings to the west provide some containment of the parcel, the parcel is open, largely undeveloped and the woodland has a strong sense of distinction from the urban edge. Therefore, development would be considered sprawl of the large built up area.	Significant impact	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. Although the residential development within Loudwater to the southeast, and washed over residential dwellings to the west provide some containment of the parcel, the parcel is open, largely undeveloped and the woodland has a strong sense of distinction from the urban edge. Therefore, development would be considered sprawl of the large built up area. However, the motorway near its northern and western boundary and the ancient woodland on its eastern boundary would restrict further development sprawl in these directions, limiting the role this parcel plays in restricting sprawl.	Relatively limited impact
LW8	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. Although the parcel is largely open with a strong sense of distinction from the urban edge by woodland to the east, the M25 motorway to the west, aquatics centre to the south and residential properties within Loudwater to the southeast provide some containment of the parcel, limiting the extent to which development would be considered sprawl of the large built up area.	Moderate impact	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. Although the parcel is largely open with a strong sense of distinction from the urban edge by woodland to the east, the M25 motorway to the west, aquatics centre to the south and residential properties within Loudwater to the southeast provide some containment of the parcel, limiting the extent to which development would be considered sprawl of the large built up area. Additionally, were the parcel to be developed, the M25 motorway on its northern and southern boundaries and ancient woodland near its eastern boundary would serve to restrict further sprawl, limiting the role played by the parcel.	Relatively limited impact
LW9	Loudwater is close enough to more contiguous urban development to the south to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is predominantly open and undeveloped. However, the extent to which the parcel is contained by residential development and the motorway limits the extent to which release would constitute urban sprawl.	Relatively limited impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
MC1	Maple Cross is located close enough to more contiguous urban development to the north and east to be associated with the large built up area and the parcel is open and undeveloped with some distinction from the inset settlement edge.	Moderate impact	N/A	N/A
MC2	Maple Cross is located close enough to more contiguous urban development to the north and east to be associated with the large built up area and the parcel is open and undeveloped. However, there is some containment by existing development to the north and west, and little distinction between the settlement and the countryside which limits the extent to which development would be considered sprawl of the large built up area.	Relatively limited impact	N/A	N/A
MC3	Maple Cross is located close enough to more contiguous urban development to the east to be associated with the large built up area and the parcel is open and undeveloped however, there is some containment by existing development to the north and west and little distinction between the settlement and the countryside which limits the extent to which development would be considered sprawl of the large built up area.	Relatively limited impact	N/A	N/A
MC4	While the parcel is located further from the more contiguous development that forms part of the large built up area, it lies adjacent to Maple Cross and is open and undeveloped with clear distinction from the urban edge.	Moderate impact	N/A	N/A
MC5	Maple Cross is located close enough to more contiguous urban development to the east to be associated with the large built up area. The parcel is open and undeveloped and has some distinction from the urban edge. Therefore development would constitute urban sprawl.	Relatively significant impact	Maple Cross is located close enough to more contiguous urban development to the east to be associated with the large built up area. The parcel is open and undeveloped and has some distinction from the urban edge. Therefore development would constitute urban sprawl. However, as development to the east would be prevented by the presence of Springwell Lake and River Colne on its eastern boundaries, this limits the role the parcel plays in preventing sprawl in this direction.	Moderate impact
MC6	The parcel's containment by urban development and lack of distinction from the settlement edge limits the extent to which development would be considered sprawl of the large built up area.	Relatively limited impact	N/A	N/A
MC7	While the parcel is located further from the more contiguous development that forms part of the large built up area, it lies adjacent to Maple Cross which is associated with the large built up area and is open and undeveloped.	Moderate impact	While the parcel is located further from the more contiguous development that forms part of the large built up area, it lies adjacent to Maple Cross which is associated with the large built up area and is open and undeveloped. However, the M25 motorway on its western boundary limits the parcel's role in preventing sprawl in this direction only were the parcel to be developed.	Moderate impact

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
MC8	Urbanising development around the parcel which creates a strong sense of containment limits the extent to which development would be considered as sprawl of the large built up area.	Limited to no impact	N/A	N/A
MC9	While the parcel is located further from the more contiguous development that forms part of the large built up area, it lies adjacent to Maple Cross which is associated with the large built up area and is open and undeveloped. Weak settlement edge boundaries limit the extent to which development would be perceived as sprawl	Moderate impact	While the parcel is located further from the more contiguous development that forms part of the large built up area, it lies adjacent to Maple Cross which is associated with the large built up area and is open and undeveloped. Weak settlement edge boundaries limit the extent to which development would be perceived as sprawl. Additionally, the M25 motorway on its western boundary would restrict sprawl in this direction were the parcel to be developed, limiting the role the parcel plays in restricting sprawl from the large built-up area. However, there is a lack of containment by physical features to the south, and so the parcel remains important in restricting further sprawl in this direction.	Relatively limited impact
MC10	Maple Cross is located close enough to more contiguous urban development to the north and east to be associated with the large built up area. The parcel is open and undeveloped and has some distinction from the urban edge. Therefore development would constitute urban sprawl.	Relatively significant impact	Maple Cross is located close enough to more contiguous urban development to the north and east to be associated with the large built up area. The parcel is open and undeveloped and has some distinction from the urban edge. Therefore development would constitute urban sprawl. However, the M25 motorway on its western boundary, and to a lesser extent, Denham Way north of its northern boundary, would restrict sprawl in this direction were the parcel to be developed, limiting the role the parcel plays in restricting sprawl from the large built-up area.	Moderate impact
MC11	Maple Cross is located close enough to more contiguous urban development to the north and east to be associated with the large built up area and the majority of the parcel is open and undeveloped. However, there is some containment by existing development to the south and east, and little distinction between the settlement and the countryside to the south which limits the extent to which development would be considered sprawl of the large built up area.	Relatively limited impact	N/A	N/A
ND1	The parcel is adjacent to the edge of the Greater London large built up area and has strong openness, given that the wooded area has a strong relationship with surrounded protected woodland. However the weak boundary to the south, defined by residential gardens, somewhat limits the land's role in preventing sprawl.	Relatively significant impact	N/A	N/A
ND2	The parcel is adjacent to the Greater London large built up area and is open, and Oxhey Drive South creates some distinction from the inset settlement edge, but strong woodland containment to the north and east and washed-over but urbanising development to the south limit the extent to which development would be considered urban sprawl.	Moderate impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
ND3	The parcel lies adjacent to the urban edge of the Greater London large built up area, and has relatively strong openness. Tree cover to the south of Batchworth Lane provides further distinction from the inset edge and some relationship with adjacent woodland to the south and west.	Relatively significant impact	N/A	N/A
ND4	The land is adjacent to the edge of the Greater London large built up area and is largely free of urbanising uses. The distinction from the urban edge provided by tree cover also contributes to the distinction from urbanising uses, acting as a barrier to sprawl.	Significant impact	N/A	N/A
ND5	Development within the parcel partially limits openness, but the field to the south is undeveloped, and although there is an adjacent row of inset dwellings along the western side of Rickmansworth Road, and washed over but urbanising development to the south at Mount Vernon Hospital, the main road does form a western boundary to most of Northwood. Expansion of the settlement into this area would therefore constitute relatively significant sprawl.	Relatively significant impact	N/A	N/A
ND6	The parcel lies adjacent to the edge of the Greater London large built up area and, despite a degree of low density development, remains relatively open. It has only a short frontage to the urban edge, with tree cover to create distinction.	Relatively significant impact	N/A	N/A
ND7	The parcel is adjacent to the edge of the Greater London large built up area, and has strong openness. Moor Lane, the valley-side slope and tree cover create strong distinction from the inset development to the south, giving the land a significant role in preventing sprawl.	Significant impact	The parcel is adjacent to the edge of the Greater London large built up area, and has strong openness. Moor Lane, the valley-side slope and tree cover create strong distinction from the inset development to the south. However, the River Colne and Thurlows Lake and associated low-lying ground and ponds on the parcel's northern boundary would restrict further development in this direction were the parcel to be developed.	Relatively significant impact
ND8	The parcel is adjacent to the edge of the Greater London large built up area. Although it contains a dwelling, and lies adjacent to inset development, the woodland that occupies most of the parcel is strongly associated with contiguous woodland to the north, within the local nature reserve, giving the land a stronger association with the wider countryside than urbanising uses.		N/A	N/A
ND9	The parcel lies adjacent to the edge of the Greater London large built up area, but development within the parcel, the urbanising influence of houses to the south and containment by woodland and the railway, limit the role this land plays in preventing sprawl.	Moderate impact	The parcel lies adjacent to the edge of the Greater London large built up area, but development within the parcel, the urbanising influence of houses to the south and containment by woodland and the railway, limit the role this land plays in preventing sprawl. Additionally, the raised railway line on its eastern	Relatively limited impact

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
			boundary would serve to further restrict development were the parcel to be developed, limiting the role of the parcel in preventing sprawl.	
ND10	The parcel is adjacent to the edge of the Greater London large built up area, has limited urbanising influences and is in part strongly distinguished from urbanising uses by the railway line. However the boundary is more weakly distinguished to the south, and the containment by the settlement edge and washed over linear development along Sandy Lodge Road somewhat limit the its role in preventing sprawl.	Moderate impact	N/A	N/A
ND11	The parcel lies adjacent to the edge of the Greater London large built up area and, despite significant development in parts, retains some openness. The distinction from the inset edge at Moor Park provided by the railway line increases the extent to which development beyond it would constitute sprawl, however this is to a degree offset by the urbanising influence of Merchant Taylor's School to the north.	Moderate impact	N/A	N/A
ND12	The parcel lies adjacent to the edge of the Greater London large built up area and contains no urbanising influences. The woodland cover provides strong distinction from the settlement edge, and the presence of the A4125 to the east only contains the land from surrounding countryside to a limited degree.	Relatively significant impact	N/A	N/A
RW1	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. However there is some containment by existing development which limits the extent to which development would be considered sprawl of the large built up area.	Moderate impact	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. However there is some containment by existing development which limits the extent to which development would be considered sprawl of the large built up area. Additionally, the M25 motorway limits the role played by the parcel in limiting development sprawl to the east of the parcel, although there are no such physical features limiting further development sprawl to the west.	Relatively limited impact
RW2	The parcel is close enough to more contiguous urban development to the east to be associated with the large built-up area extending out from Greater London. Most of the parcel retains distinction from the inset settlement in terms of the character and density of development, but the extent of existing development nonetheless limits contribution to this purpose.	Moderate impact	N/A	N/A
RW3	The parcel is close enough to more contiguous urban development to the east to be associated with the large built-up area extending out from Greater London. It contains some urbanising	Moderate impact	The parcel is close enough to more contiguous urban development to the east to be associated with the large built-up area extending out from Greater London. It contains some urbanising development but the lane creates some distinction from the inset settlement. A raised railway line would prevent further sprawl to	Relatively limited impact

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	development but the lane creates some distinction from the inset settlement.		the south. Urbanising development has already taken place immediately after the railway line to the south, further limiting the role played by the parcel in limiting sprawl.	
<b>RW4</b>	Urbanising development around the parcel, and the motorway which creates distinction from the wider Green Belt limits the extent to which development would be considered sprawl of the large built up area.	Relatively limited impact	Urbanising development around the parcel, and the motorway which creates distinction from the wider Green Belt limits the extent to which development would be considered sprawl of the large built up area. The M25 motorway on its western boundary and a small ancient woodland beyond the motorway would serve to restrict development in this direction were the parcel to be developed, further limiting the role played by the parcel in preventing sprawl.	Limited to no impact
<b>RW5</b>	While the parcel is open and undeveloped, urbanising development around the parcel and the motorway and A road which create distinction from the wider Green Belt limit the extent to which development could be considered as sprawl of the large built up area.	Moderate impact	While the parcel is open and undeveloped, urbanising development around the parcel and the motorway and A road which create distinction from the wider Green Belt limit the extent to which development could be considered as sprawl of the large built up area. The M25 motorway on its north-western boundary would also serve to restrict any further development sprawl from beyond the built-up area and the parcel were the parcel to be developed, limiting the role of the parcel. However, the M25 motorway is further from the south-west boundary and would not prevent all further development sprawl in this direction.	Relatively limited impact
<b>RW6</b>	Urbanising development in and around the parcel limits the extent to which release of the parcel would constitute sprawl of the large urban area.	Limited to no impact	N/A	N/A
<b>RW7</b>	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London. The parcel is open and undeveloped and the A412 provides distinction from the settlement edge. Therefore development would be considered sprawl of the large built up area.	Relatively significant impact	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London. The parcel is open and undeveloped and the A412 provides distinction from the settlement edge. Therefore development would be considered sprawl of the large built up area. However, Springwell Lake and River Colne on the north-eastern and south-eastern boundary would serve to restrict development in this direction were the parcel to be developed and therefore limit the role played by the parcel in preventing sprawl. However, further development remains possible northwards until the M25 motorway.	Moderate impact
<b>RW8</b>	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London. The parcel is open and undeveloped and the River Colne, and flood plain to the west provides distinction from the settlement edge. Therefore, development would be considered sprawl of the large built up area.	Relatively significant impact	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London. The parcel is open and undeveloped and the River Colne, and flood plain to the west provides distinction from the settlement edge. Therefore, development would be considered sprawl of the large built up area. However, Springwell Lake and River Colne on the southern boundary would serve to restrict development in this direction were the parcel to be developed and therefore limit the role played by the parcel in preventing sprawl.	Relatively limited impact

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
<b>RW9</b>	Most of the parcel retains distinction from the inset settlement in terms of the character and density of development, but the extent of existing development nonetheless limits contribution to this purpose.	Relatively limited impact	Most of the parcel retains distinction from the inset settlement in terms of the character and density of development, but the extent of existing development nonetheless limits contribution to this purpose. Further, Stocker's Lake and River Colne near to the southern boundary would serve to restrict development in this direction were the parcel to be developed and therefore limit the role played by the parcel in preventing sprawl.	Relatively limited impact
<b>RW10</b>	The parcel is open and undeveloped however, urbanising development around the parcel limits the extent to which development would be considered sprawl of the large built up area.	Moderate impact	The parcel is open and undeveloped however, urbanising development around the parcel limits the extent to which development would be considered sprawl of the large built up area. Further, Batchworth Lake and River Colne near to the southern boundary would serve to restrict development in this direction were the parcel to be developed and therefore limit the role played by the parcel in preventing sprawl.	Relatively limited impact
<b>RW11</b>	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London. The parcel is open and uncontained and the watercourse provides distinction from the urban edge. Therefore release would constitute sprawl of the large built up area.	Significant impact	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London. The parcel is open and uncontained and the watercourse provides distinction from the urban edge. Therefore release would constitute sprawl of the large built up area. However, a series of lakes on its north-eastern border would prevent further development in this direction, were the parcel to be developed, limiting the role the parcel plays in restricting sprawl. However, some level of further development is possible beyond its south-eastern border.	Relatively significant impact
<b>RW12</b>	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London. The parcel is open and undeveloped and so development would constitute sprawl of the large built up area.	Relatively significant impact	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London. The parcel is open and undeveloped and so development would constitute sprawl of the large built up area. However, a raised railway line and depot on its northern boundary and a lake on its southern boundary would prevent further sprawl in these directions, were the parcel to be developed, limiting the role played by the parcel in restricting sprawl.	Relatively limited impact
<b>RW13</b>	The containment of the parcel by the urban areas of Rickmansworth and South Oxhey, which form part of the large built up area, and the washed over development and railway tracks which create distinction from the wider Green Belt limits the extent to which development would be considered sprawl of the large built up area.	Relatively significant impact	The containment of the parcel by the urban areas of Rickmansworth and South Oxhey, which form part of the large built up area, and the washed over development and railway tracks which create distinction from the wider Green Belt limits the extent to which development would be considered sprawl of the large built up area. However, a raised railway line and depot on its southern boundary would prevent further sprawl in this direction were the parcel to be developed, limiting the role played by the parcel in restricting sprawl. Further development would, though, be possible, northwards from the parcel, increasing the role played by the parcel.	Moderate impact
<b>RW14</b>	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London. The parcel	Relatively significant impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	is largely open and undeveloped and has some distinction from the urban edge and so development would constitute sprawl of the large built up area. This is limited slightly by its containment by the urban edges of Rickmansworth, some washed over development to the east and the school to the north.			
<b>RW15</b>	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. There is extensive development within the parcel but the school is reasonably low density with large areas of open space. There is a reasonably strong sense of distinction from the urban edge along the A404 and no urban containment to the north, east or south. The extent of existing development within the parcel however would limit the extent to which further development would be considered to constitute sprawl.	Moderate impact	N/A	N/A
<b>RW16</b>	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open but is partially contained by development to the north (Loudwater) and to the south east by the Royal Masonic School for Girls	Relatively significant impact	N/A	N/A
<b>RW17</b>	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. Whilst the parcel is contained by development on three edges, the land is predominately open with the exception of a few residential properties. Extensive tree cover retains a reasonably strong sense of distinction from the inset area.	Moderate impact	N/A	N/A
<b>RW18</b>	Rickmansworth is close enough to more contiguous urban development to the east to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is predominately open and undeveloped. However, the extent to which the parcel is contained by residential development and the motorway limits the extent to which release would constitute urban sprawl.	Relatively limited impact	N/A	N/A
<b>SO1</b>	The parcel is located between South Oxhey and Watford which form part of the large built up area. While it is partially contained by urban areas, it is open and undeveloped and there is some	Relatively significant impact	The parcel is located between South Oxhey and Watford which form part of the large built up area. While it is partially contained by urban areas, it is open and undeveloped and there is some distinction from the urban edge to the east and along sections to the south. However, ancient woodland on its eastern boundary	Relatively significant impact

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	distinction from the urban edge to the east and along sections to the south.		would prevent a small amount of further development sprawl, were the parcel to be developed. This is not significant enough to reduce the role played by the parcel in preventing development sprawl.	
<b>SO2</b>	South Oxhey forms part of the large built-up area, so its expansion would constitute urban sprawl. Woodland in this area plays an important containing role, so development into it would be perceived as significant sprawl, although proximity to Watford, also part of the large built-up area, places a limit on the extent to which sprawl could occur.	Relatively significant impact	South Oxhey forms part of the large built-up area, so its expansion would constitute urban sprawl. Proximity to Watford, also part of the large built-up area, places a limit on the extent to which sprawl could occur. Further, ancient woodland on its western boundary would prevent further restrict development sprawl in this direction, were the parcel to be developed, so limiting the role played by the parcel in preventing sprawl in this direction, though no such physical features provide such obstacles to the east.	Moderate impact
<b>SO3</b>	The parcel lies on the edge of South Oxhey, which is contiguous with Greater London and forms part of the large built up area. The A4008 and the landform provide strong distinction from the inset settlement edge and the parcel is open and uncontained therefore, development would constitute sprawl.	Significant impact	N/A	N/A
<b>SO4</b>	The parcel is located on the edge of South Oxhey, which is contiguous with Greater London and forms part of the large built up area. Tree belts provide strong distinction from the inset settlement edges, somewhat limiting containment and the parcel is mostly open, though it contains some urbanising development in the form of the garden centre.	Relatively significant impact	N/A	N/A
<b>SO5</b>	The parcel lies adjacent to the edge of the Greater London built up area however both its partial containment and the relatively weak distinction with the urban edge to the north limit its contribution to preventing urban sprawl.	Moderate impact	N/A	N/A
<b>SO6</b>	South Oxhey is close enough to more contiguous urban development to the north and west to be considered to constitute part of the large built-up area extending out from Greater London. The parcel is open and although the inset development of Hatch End south of the parcel provides some containment of the Green Belt land south of the parcel, the open fields are large enough to be considered as countryside and retain a countryside character. The tree fringed railway line and B4542 create strong distinction from the adjoining inset settlement edge of South Oxhey to the west and north. Therefore, development would be considered sprawl of the large built up area.	Significant impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
SO7	The parcel lies on the edge of the Greater London large built up area and has some degree of openness, but is significantly contained on all sides. Further, the formal recreational use of the playing fields leads to a stronger association with the urban edge, limiting somewhat the land's role in preventing sprawl.	Moderate impact	The parcel lies on the edge of the Greater London large built up area and has some degree of openness, but is significantly contained on all sides. Further, the formal recreational use of the playing fields leads to a stronger association with the urban edge, limiting somewhat the land's role in preventing sprawl. Additionally, a railway on its eastern border, with a subsequent fall in the landform, would prevent development sprawl in this direction were the parcel to be developed, further reducing the role of the parcel in preventing sprawl. There are no such physical features to the south of the parcel and thus the parcel plays a role in preventing further development in this direction.	Relatively limited impact
SO8	The parcel is adjacent to the edge of the Greater London built up area, but its openness is significantly compromised by existing development. Further, the relatively weak distinction from the urban edge and the significant containment - by protected woodland to the west and the settlement edge elsewhere - limit its relationship with the open countryside and therefore its role in preventing urban sprawl.	Limited to no impact	N/A	N/A
SO9	South Oxhey is close enough to more contiguous urban development to the north and west to be considered to constitute part of the large built-up area extending out from Greater London. However, it has a close association with the inset settlement because of its containment between the inset edge and the A4125 and its strong distinction from the surrounding woodland. Therefore the extent to which release of the parcel would be considered sprawl of the large built up area is very limited.	Limited to no impact	N/A	N/A
WE1	Watford forms part of the large built-up area, but the extent of containment of the parcel by the urban area means that any development would be considered infill rather than sprawl.	Limited to no impact	N/A	N/A
WE2	Watford forms part of the large built-up area and is contained along its north western edge by the M1. Any development extending the urban area across the motorway would therefore constitute significant sprawl of the large built-up area.	Significant impact	N/A	N/A
WE3	Watford forms part of the large built-up area and, despite its urbanising elements, and the parcel contains open land which has some separation from the urban edge, the alignment of which is consistent with the settlement edge to the north and the south. However the strong distinction from the wider Green Belt created by river, woodland and roads limits the extent to which further development would be considered to constitute sprawl.	Moderate impact	Watford forms part of the large built-up area. Despite its urbanising elements, the parcel contains open land which has some separation from the urban edge, the alignment of which is consistent with the settlement edge to the north and the south. However the strong distinction from the wider Green Belt created by river, ancient woodland and roads limits the extent to which further development would be considered to constitute sprawl. The A4008 and A41 would, additionally, restrict the spread of development northwards, eastwards and southwards, so reducing the role played by the parcel in restricting sprawl.	Relatively limited impact

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
WE4	Watford and, to the east, Bushey, form part of the large built-up area, but this parcel has a strong association with the former urban area, and containment from the latter and from the wider Green Belt by woodland along the river corridor. This limits the extent to which development would be considered to constitute urban sprawl.	Relatively limited impact	Watford and, to the east, Bushey, form part of the large built-up area, but this parcel has a strong association with the formerly mentioned urban area, and containment from the latter and from the wider Green Belt by woodland along the river corridor. This limits the extent to which development would be considered to constitute urban sprawl. Sprawl would also be further limited by the A4008 on the parcel's outer, eastern boundary.	Relatively limited impact
WE5	The parcel does not contain any urbanising development, but forms part of a narrow belt of open land between two settlements that both form part of the large built-up area. This limits the extent to which development would be considered sprawl.	Moderate impact	N/A	N/A
WE6	The parcel does not contain any urbanising development, but forms part of a narrow belt of open land between two settlements that both form part of the large built-up area. This limits the extent to which development would be considered sprawl.	Moderate impact	N/A	N/A
WE7	Watford and Carpenders Park both form part of the large built-up area. Expansion out from Watford would constitute sprawl, but there is sufficient containment by woodland to limit the impact on contribution to this purpose.	Moderate impact	Watford and Carpenders Park both form part of the large built-up area. Expansion out from Watford would constitute sprawl, but the parcel is strongly bounded by ancient woodland to the south which decreases its contribution to this purpose. Development sprawl is not restricted to the south-east, however.	Moderate impact
WE8	Watford Heath forms part of the large built-up area, but the parcel's uses give it a strong association with the settlement.	Relatively limited impact	Watford Heath forms part of the large built-up area, but the parcel's uses give it a strong association with the settlement. Additionally, the parcel is strongly bounded by ancient woodland to the south, restricting any further development sprawl, which further decreases its contribution to this purpose.	Limited to no impact
WE9	South Oxhey forms part of the large built-up area, so its expansion would constitute urban sprawl. Woodland in this area plays an important containing role, so development into it would be perceived as significant sprawl, although proximity to Watford, also part of the large built-up area, places a limit on the extent to which sprawl could occur.	Relatively significant impact	South Oxhey forms part of the large built-up area, so its expansion would constitute urban sprawl. Proximity to Watford, also part of the large built-up area, places a limit on the extent to which sprawl could occur. Further, ancient woodland on its western boundary would prevent further restrict development sprawl in this direction, were the parcel to be developed, so limiting the role played by the parcel in preventing sprawl in this direction, though no such physical features provide such obstacles to the east.	Moderate impact
WN10	The parcel is located on the edge of Watford and Bricket Wood which is close enough to the more contiguous development of Greater London to form part of the large built up area. The parcel is largely open and undeveloped. However, it has no significant separation from the urban edge of Bricket Wood and is partially contained by inset development to the north and south, by the motorway to the west and by washed over development in the form of an industrial park to the south east	Moderate impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
WN4	The parcel lies on the edge of Watford which forms part of the large built up area. It is predominantly open and undeveloped, though the presence of some washed over development and the lack of distinction with the inset edge limits the extent to which release would be considered as sprawl.	Moderate impact	N/A	N/A
WN5	While the parcel is located on the edge of the large built up area, its containment by the urban edges of Watford and woodland to the north increases its association with the urban area and limits the extent to which development would be considered sprawl	Relatively limited impact	N/A	N/A
WN6	The parcel is located on the edge of Watford which forms part of the large built up area as it is contiguous with Greater London. It is predominantly open and undeveloped and the woodland within it provides distinction from the inset settlement edge. The presence of the washed over development to the north and west slightly limits the extent to which release would be considered as sprawl.	Relatively significant impact	N/A	N/A
WN7	The parcel is located on the edge of Watford, which forms part of the large built up area. It retains some openness and distinction from the inset settlement edge to the east due to the A405 however, to the south and west there is little distinction from the settlement. The parcel contains built development and is largely contained by the inset area which limits the extent to which release would be considered as sprawl	Moderate impact	N/A	N/A
WN8	The parcel is located on the edge of Watford, which forms part of the large built up area. It is uncontained and High Elms Lane provides some distinction from the inset urban edge.	Relatively significant impact	N/A	N/A
WN9	The parcel is located on the edge of Watford which forms part of the large built up area. However, the lack of distinction from the urban edge, its containment by the A405 and the M1 and inset development from Bricket Wood to the north limits the extent to which development would be considered sprawl of the large built up area.	Relatively limited impact	N/A	N/A
WS1	The parcel is located on the edge of Watford, which forms part of the large built up area. It is open and undeveloped and Tolpits Lane and associated tree cover provide distinction from the urban edge. Containment of the parcel by the inset edge of Watford to the north and the River Colne and Hampermill Lake to the south	Relatively significant impact	The parcel is located on the edge of Watford, which forms part of the large built up area. It is open and undeveloped and Tolpits Lane and associated tree cover provide distinction from the urban edge. The parcel is partly enclosed by Watford to the north and washed over development to the south. The River Colne combined with Hampermill Lake form a prominent physical feature in	Moderate impact

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	slightly limit the extent to which development would be considered sprawl.		reasonable proximity to the southern boundary of the parcel which are likely to prevent further sprawl beyond the parcel.	
WS2	The parcel is located on the edge of Watford which forms part of the large built up area however, its strong association with the inset settlement edge limits the extent to which development would be considered sprawl. Any sense of separation created by the A4145 is diminished by the extent to which the urban area contains the parcel.	Relatively limited impact	N/A	N/A
WS3	The parcel has strong distinction from the inset edge of Watford and is open and undeveloped. Although largely contained in the wider context the open area is large enough for development in the parcel to constitute sprawl.	Relatively significant impact	N/A	N/A
WS4	The parcel is located on the edge of Watford which forms part of the large built up area however, it contains urbanising influences in the form of the substation and, while it has some distinction from the settlement, it is contained by the inset urban edges to the north and east which limits the extent to which development would be considered sprawl.	Relatively limited impact	N/A	N/A
WS5	The parcel is located on the edge of the Oxhey suburb of Watford, which forms part of the large built up area. Although it has relatively little separation from the inset urban edges and is partially contained, it is open and undeveloped with a strong visual relationship with the wider countryside.	Relatively significant impact	N/A	N/A
WS6	The parcel is located between South Oxhey and Watford which form part of the large built up area. While it is partially contained by urban areas, it is open and undeveloped and there is some distinction from the urban edge to the east and along sections to the south.	Relatively significant impact	The parcel is located between South Oxhey and Watford which form part of the large built up area. While it is partially contained by urban areas, it is open and undeveloped and there is some distinction from the urban edge to the east and along sections to the south. However, ancient woodland on its eastern boundary would prevent a small amount of further development sprawl, were the parcel to be developed. This is not significant enough to reduce the role played by the parcel in preventing development sprawl.	Relatively significant impact
WS7	The parcel is located on the edge of Watford, which is part of the large built up area. However, it is partially contained by inset development, has little distinction from the settlement edge to the north and, although it is partially open it contains some urbanising uses which limits the extent to which further development in the parcel would be considered sprawl of the large built up area.	Relatively limited impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
WW2	The parcel lies adjacent to west Watford which is contiguous with the large built up area of Greater London. Tree cover within the parcel creates distinction from the urban area however, the containment of the parcel by existing urban development and by the constrained land to the north (Cassiobury Park Nature Reserve) limits the scope for sprawl.	Relatively significant impact	N/A	N/A
WW3	Watford forms part of the contiguous urban development extending out from Greater London, and so forms part of the large built up area. Tree belts within the parcel create some distinction from the urban edge and the parcel is largely open and undeveloped. However the small areas of washed over development and its usage as play areas and sport fields creates some association with the settlement and limits the extent to which development would be considered sprawl.	Relatively significant impact	N/A	N/A
WW4	The parcel lies on the edge of Watford, which forms part of the large built up area as it is contiguous with Greater London. It is open and undeveloped and the tree belt and A411 provides distinction from the urban edge. Development would be considered sprawl of the large built up area.	Significant impact	N/A	N/A
WW5	The A411 and the tree belt, as well as the character and density of development creates some distinction from the inset settlement edge. However the parcel is partially developed and the River Gade and tree cover creates some containment which limits the extent to which development would be considered sprawl of the large built up area.	Moderate impact	N/A	N/A
WW6	The parcel is located on the edge of Watford and is open and undeveloped however, its limited size and containment by the A41, which strengthens the relationship of the parcel with the urban area, limits the extent to which development would constitute sprawl of the large built up area.	Moderate impact	The parcel is located on the edge of Watford and is open and undeveloped. However, its limited size and containment by the A41, which strengthens the relationship of the parcel with the urban area, limits the extent to which development would constitute sprawl of the large built up area. The A41 would also be considered a prominent physical feature in reasonable proximity to the northern and western boundary of the parcel which is likely to prevent further sprawl beyond the parcel.	Relatively limited impact
WW7	While the parcel is located on the edge of Watford, its containment by inset development limits the extent to which development would be considered sprawl.	Relatively limited impact	N/A	N/A
WW8	The parcel is located on the northern edge of Watford and while limited by the large studio building, it retains some openness. It	Moderate impact	N/A	N/A

Parcel	Stage 2 GBR Purpose (a) text	Stage 2 GBR purpose (a) score	Updated purpose (a) assessment	Updated purpose (a) score
	has a strong relationship with the Green Belt to the east and due to the A41 has clear distinction from the inset settlement edge.			
WW9	The parcel is located on the edge of Watford and retains some openness and distinction from the inset settlement edge to the south. Although the studio backlot structures are temporary, the usage of the area creates an association with the adjacent studio buildings within the inset settlement edge, from which there is no significant separation. This limits the extent to which development would be considered sprawl of the large built up area.	Moderate impact	The parcel is located on the edge of Watford and retains some openness and distinction from the inset settlement edge to the south. Although the studio backlot structures are temporary, the usage of the area creates an association with the adjacent studio buildings within the inset settlement edge, from which there is no significant separation. The presence of the A41 on its southern boundary and the railway line on its western boundary, and beyond this, the M25 motorway, would restrict any further development sprawl in these directions, limiting the role of the parcel in restricting further development sprawl.	Relatively limited impact

## A.3 Stage 2 GBR Parcels: Assessment Data Table

Note: Parcel ID and purpose (b), (c), (d) and (e) scores are taken from the Stage 2 GBR. The purpose (a) scores are based on the updated analysis of the Stage 2 GBR, as documented in Appendix A.2. Provisional grey belt status has been determined as part of this report.

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
AL1	Moderate 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	Moderate 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	Relatively limited impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
AL7	Limited to no 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 limited 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	Relatively limited 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	Relatively limited 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	Moderate 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

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
BW4	Relatively significant impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
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	<b>No</b>
BW7	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
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	Relatively limited 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	<b>No</b>
CG12	Significant impact	Relatively significant impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
CG2	Relatively limited impact	Relatively significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
CG3	Limited to no impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
CG4	Relatively limited impact	Relatively significant impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
CG5	Moderate impact	Relatively significant impact	Moderate impact	Limited to no impact	Limited to no impact	<b>No</b>
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	<b>No</b>
CG8	Relatively significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
CG9	Relatively significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
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	Moderate impact	Relatively significant impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
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	Relatively significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
CH8	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
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
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	Relatively limited impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
LW8	Relatively limited 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	Moderate 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	Relatively limited 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

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
ND11	Moderate impact	Relatively significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
ND12	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
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	<b>No</b>
ND4	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
ND5	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
ND6	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
ND7	Relatively significant impact	Moderate impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
ND8	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
ND9	Relatively limited impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW1	Relatively limited impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW10	Relatively limited impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW11	Relatively significant impact	Moderate impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
RW12	Relatively limited impact	Relatively significant impact	Moderate impact	Limited to no impact	Limited to no impact	<b>No</b>
RW13	Moderate impact	Significant impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
RW14	Relatively significant impact	Moderate impact	Moderate impact	Limited to no impact	Limited to no impact	<b>No</b>
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	Relatively limited impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW4	Limited to no impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
RW5	Relatively limited 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	Moderate impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
RW8	Relatively limited impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
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	<b>No</b>
SO4	Relatively significant impact	Relatively limited impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
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	Relatively limited 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	Relatively limited 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	Limited to no impact	Relatively limited impact	Relatively limited impact	Limited to no impact	Limited to no impact	Yes
WE9	Moderate 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
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	Moderate 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

Parcel ID	Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Provisional Grey Belt
WW2	Relatively significant impact	Moderate impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
WW3	Relatively significant impact	Limited to no impact	Relatively significant impact	Limited to no impact	Limited to no impact	<b>No</b>
WW4	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	<b>No</b>
WW5	Moderate impact	Limited to no impact	Moderate impact	Limited to no impact	Limited to no impact	Yes
WW6	Relatively limited 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	Relatively limited impact	Relatively limited impact	Moderate impact	Limited to no impact	Limited to no impact	Yes