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LAND NORTH OF LITTLE GREEN LANE, CROXLEY GREEN

Comments on TRDC Stage 4 Green Belt Review (September 2025)

1. The Stage 4 Green Belt Review (GBR4) was produced by Arap. Part of the purpose of the study was to review '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' (section 1.2 of the GBR4). It also notes that the study incorporated additional elements, including 'Grey belt identification following the key steps set out in the Green Belt Planning Practice Guidance'.
2. I do not agree with their methodology, and in particular in relation to purpose a, and I set out why I don't agree below.

Methodology in GBR4

3. GBR4 considered the previous Green Belt Assessments, including the Stage 2 2019 LUC study ('GBA2'), noting that *'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'* (section 3.3.1 of GBR4).
4. The criteria for assessing purpose a within GBA2 is noted as:

'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...'

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.'*

5. In section 4.3.1, it notes *'Given the new need for grey belt to be identified and its definition within the NPPF, GBRs must include performance scores for Green Belt purposes (a), (b) and (d). The GBR*

studies have considered these three purposes. Although the Stage 2 GBR does not explicitly include purpose (d) within the individual parcel assessment proformas, the methodology explores this purpose concluding it does not apply within district. It can thus be assumed that all land makes no contribution to this purpose.'

6. It continues in section 4.3.2:

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

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

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

7. Table 1, Comparison of PPG's illustrative features to approach taken in the Stage 2 GBA 2019 study, is partially reproduced below:

Purpose	PPG – Strong contribution	Stage 2 – Significant or relatively significant impact
(a)	Assessment areas that contribute strongly are likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended "finger" of development into the Green Belt)	Development would constitute significant sprawl as the land is close to the large built-up area, contains no or very limited urban development, is not itself contained by any urban development, and has strong distinction from the inset settlement edge. / Development would constitute relatively significant sprawl as the land is close to the large built-up area and contains very limited urban development and has a strong sense of openness. It relates more strongly to the wider countryside.

8. I do NOT agree that the approaches are aligned. There is no mention of 'physical features' which would contain development within the Stage 2 methodology. The two approaches are, on the whole, very different.
9. GBR4 continues in section 4.5, stating that *'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.’ I do not agree that the Stage 2 assessment correlates with the updated PPG, and I do not agree that GBA2 can be used to identify grey belt.

10. In section 6, the GBR4 sets out how it has used GBA2 to come to a grey belt conclusion. It states in section 6.2 that *‘The results of the Stage 2 GBA purposes assessment were filtered to isolate parcels which do not contribute strongly to any one of purposes (a), (b), or (d). The score values from the Stage 2 GBA were matched to the PPG’s weak, moderate and strong contribution scale, as show in Table 5. Thus, parcels identified within the Stage 2 GBA as not having a relatively significant or significant impact were identified as provisional grey belt.’*
11. Table 5 is reproduced below:

Table 5 Purpose scores

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

12. Therefore, GBA4 finds that the Site at Croxley Green is NOT grey belt, based on its assessment within GBA2, as shown on the extract below:

CG8	Significant impact	Limited to no impact	Significant impact	Limited to no impact	Limited to no impact	No
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Conclusion

13. The methodology used in assessing the harm to the Green Belt in GBS2, does not align with the updated PPG in relation to purpose a, for several reasons, not least as it makes no mention of physical features which could contain development.
14. Therefore, the findings of GBA2 cannot be directly translated to an assessment of contribution in relation to the grey belt.

Appendix A1

Green Belt Assessment Addendum March 2025



Green Belt Assessment Addendum

Land North of Little Green Lane, Croxley Green –

March 2025

a. Introduction

1. Since the planning application for Land North of Little Green Lane, Croxley Green, was submitted, additions to the Green Belt Planning Practice Guidance ('PPG') were published. The PPG provides guidance on how to assess the contribution of land to the purposes of the Green Belt, where relevant to identifying grey belt land. This note sets out an updated assessment of the Green Belt contribution and resultant harm of the development, following an updated methodology to reflect the PPG changes.

b. Assessment of the Site against purposes of Green Belt

2. We have reassessed the contribution of the Site to the purposes of the Green Belt (i.e. its performance), as well as the resultant harm to these purposes which would occur as a result of the proposed development on the Site, following the updates to the PPG. The methodology for this assessment is contained in **Appendix A1**.

A) To check the unrestricted sprawl of large built-up areas

3. Paragraph 005 of the PPG notes that large built-up areas are considered to comprise towns or cities. Croxley Green is not considered to be a town, however, it could be seen to be a suburb of Rickmansworth (which is a town) and is therefore considered to form part of a large built-up area.
4. The Site is free from built development, and is located adjacent to a large built-up area. As set out within the submitted Landscape and Visual Impact Assessment and Green Belt Assessment (dated December 2024), the Green Belt at the Site plays some role in preventing sprawl. However, clearly identifiable physical features which would restrict further development occur to the west, north and east of the Site, in the form of lanes and woodland blocks. The Site is assessed as making a moderate contribution to purpose a of the Green Belt.
5. Development as proposed at the Site would come forward through a masterplan, and include a holistic design for the Site, including buildings and open spaces, and it would not constitute sprawl. The development would also be very well contained by the existing adjoining woodland, limiting any effects on the wider Green Belt beyond the Site, as also noted in the Council's Stage 2 assessment. The development would also form a clear extension to the existing settlement to the south. Development at the Site in line with the proposed masterplan, will result in limited harm to this purpose of the Green Belt.

B) To prevent neighbouring towns from merging into one another

6. This purpose specifically refers to towns, not villages, as highlighted in paragraph 005 of the PPG.
7. The only town within the near vicinity of the Site is Watford. The nearest suburb of Watford lies around 1km east of the Site, however, Cassiobury Park, including the large wooded hill within it, comprises the space between the Site and Watford. The existing settlement at Croxley Green south of the Site beyond Baldwin Lane, and the settlement at Watford, are separated by a small area of open land along Grand Union Canal and the River Gade, and the proposed development at the Site will therefore not decrease the existing gap between the settlements. The visual separation between towns will be maintained if the Site were to be developed. The Site therefore makes a moderate contribution to this purpose.
8. Development at the Site will remain clearly separated from Watford, and no visual merging will occur, nor any physical merging. Development at the Site will result in limited harm to this purpose by bringing parts of towns closer to each other.

C) To assist in safeguarding the countryside from encroachment

9. The existing settlement edge is well defined along Little Green Lane to the south of the Site, and the Site is clearly countryside. However, the Site benefits from very clearly defined boundaries which form a firm limit to further encroachment into the countryside. The Green Belt at the Site is therefore considered to make a moderate contribution to this purpose, and does therefore not strongly perform against this purpose.
10. The proposed development will be very well contained from the wider Green Belt, as also noted within the Council's Stage 2 assessment, and new, readily identifiable boundaries between the settlement and the wider Green Belt are available. Development would extend into the countryside, but it would be well related to the existing settlement, and will form a logical extension to Croxley Green. The harm to this purpose of the Green Belt as a result of the proposed development is considered to be moderate.

D) To preserve the setting and special character of historic towns

11. The Site does not lie within or adjacent to a historic town and therefore development at the Site will not affect this Green Belt purpose, and the Site makes no contribution to this purpose.

E) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

12. The Council are unable to meet their growth needs solely on brownfield or derelict sites, and land within the Green Belt is required for development in order for the Council to accommodate its local housing need. Development at the Site will therefore result in a limited level of harm on this purpose.

Conclusion in relation to Purposes

13. The table below sets out the assessment of the contribution of the Green Belt at the Site in relation to its purposes, alongside the assessed harm to the Green Belt purposes as a result of the proposed development. We would highlight that the Green Belt at the Site does not strongly perform against any of the Green Belt purposes.

Contribution to Green Belt Purpose		Harm to Green Belt Purpose	
Purpose a	Moderate	Purpose a	Limited
Purpose b	Moderate	Purpose b	Limited
Purpose c	Moderate	Purpose c	Moderate
Purpose d	None	Purpose d	None
Purpose e	-	Purpose e	Limited

14. The Site does not strongly contribute to the purposes of the Green Belt, due to its physically and visually well contained nature. Its position on the edge of Croxley Green, alongside the woodland adjoining the Site, provides a natural boundary between the built settlement and the wider, open Green Belt and other towns, and therefore development of the Site would not materially affect the purposes of the wider Green Belt beyond.

c. Grey Belt

15. The Glossary of the NPPF defines grey belt as follows:
16. **‘Grey belt:** For the purposes of plan-making and decision-making, ‘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.’
17. Footnote 7 sites include:
- Habitats sites: Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites; potential Special Protection Areas; possible Special Areas of Conservation; listed or proposed Ramsar sites; sites identified, or required, as compensatory measures for adverse effects on habitats sites.
 - Sites of Special Scientific Interest.
 - Local Green Space.
 - National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast.

- Irreplaceable habitats: ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh, lowland fen.
- Designated heritage assets, Listed Buildings, Conservation Areas.
- Areas at risk of flooding or coastal change.

18. Footnote 7 sites include irreplaceable habitats, which include Ancient Woodland. The Ancient Woodland within the Site is proposed to be retained and enhanced, and the remainder of the Site is not covered by any footnote 7 constraints. Given the constraint-led approach to masterplanning, it is considered that footnote 7 applies little relevance to the Site, given the area will not be developed. The occurrence of Ancient Woodland on the Site would not provide a strong reason for refusing development, especially considering the design solutions proposed within the Application.

19. As set out above, the Site makes a moderate contribution to purposes a and b, and no contribution to purpose d of the Green Belt. As such, it does not strongly contribute towards purposes a, b or d. The Site therefore comprises grey belt land.

Appropriate Development

20. NPPF Paragraph 155 notes that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where, amongst others, the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

21. Because of the small size of the Site in relation to the Green Belt in the plan area, and the fact that it is very well contained adjacent to the existing settlement, development at the Site would not fundamentally undermine the purposes of the remaining Green Belt across the plan area. Development of the Green Belt land at the Site would not affect the ability of all the remaining Green Belt across the area of the plan to serve all five of the Green Belt purposes in a meaningful way.

22. The Planning Statement considers the remainder of the parts of paragraph 155, as well as paragraphs 156 to 159, to consider whether development at the Site is not inappropriate.

Appendix A1 – Green Belt Impact Assessment Methodology

M1. GREEN BELT IMPACT ASSESSMENT METHODOLOGY

Policy Context

National Planning Policy Framework (December 2024, corrected Feb 2025)

- M1.1 Section 13 of the NPPF concerns the protection of Green Belt land. Paragraph 142 highlights that the Government attaches great importance to Green Belts, adding that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- M1.2 Paragraph 143 defines the five purposes of the Green Belt, which are:
*'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.'*
- M1.3 Paragraph 145 states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. It notes that strategic policies should have regard for the intended permanence in the long term of Green Belt boundaries.
- M1.4 Paragraph 146 goes on to state that exceptional circumstances in this context include, but are not limited to, instances where an authority cannot meet its identified need for homes, commercial or other development through other means. If that is the case, authorities should review Green Belt boundaries in accordance with the policies in the NPPF and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.
- M1.5 Paragraph 148 sets out that *'Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework.'*
- M1.6 Paragraph 151 continues, stating that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is

released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 apply.

M1.7 Paragraph 153 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 154 highlights that there are certain forms of development that are not inappropriate in the Green Belt. These include:

- *'buildings for agriculture and forestry;*
- *the provision of appropriate facilities (in connection with the existing use of land or a change of use, including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- *the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling in villages;*
- *limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- *limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*
- *Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
 - i. mineral extraction;*
 - ii. engineering operations;*
 - iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;*

- v. *material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
- vi. *development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.'*

M1.8 Paragraph 155 notes that in addition to the above, the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- *'The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- *There is a demonstrable unmet need for the type of development proposed;*
- *The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- *Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157 below'.*

M1.9 Paragraph 156 goes on to state that where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:

- *'affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;*
- *necessary improvements to local or national infrastructure; and*
- *the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.'*

M1.10 Paragraph 158 states that development which complies with the Golden Rules should be given significant weight in favour of the grant of permission.

M1.11 Paragraph 159 notes that the improvements to green spaces required as part of the Golden Rules should *"contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards*

relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes.”

National Planning Practice Guidance

- M1.12 Additions to the Green Belt Planning Practice Guidance (‘PPG’) were published in February 2025. The PPG provides guidance on how to assess the contribution of Green Belt land to the purposes of the Green Belt, where relevant to identifying grey belt land.
- M1.13 Paragraph 005 provides guidance on how the contribution of land should be assessed against the purposes relevant to identifying grey belt land, purposes a, b and d. These are considered further in Section M1.27. In relation to purpose a, it notes that villages should not be considered large built-up areas. It also notes that purposes b and d relate to towns, not villages.
- M1.14 Paragraph 008 highlights that Green Belt assessments should also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole i.e. how the release or development of the 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.
- M1.15 The PPG also provides guidance on the identification of sustainable locations, as well as the application of the Golden Rules.
- M1.16 Paragraph 013 notes that judging the openness of Green Belt land depends upon the circumstances of the case. The guidance notes that there are a number of factors to consider, and sets out three examples which include, but are not limited to:
- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
 - the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
 - the degree of activity likely to be generated, such as traffic generation.
- M1.17 Paragraph 014 goes on to reiterate Footnote 55 to the NPPF, that if development is considered to be not inappropriate development on previously developed land or grey belt, then it is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.

Grey Belt

- M1.18 The NPPF glossary notes that *‘For the purposes of plan-making and decision-making, ‘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.’*
- M1.19 Our methodology for assessing the contribution of the land to the purposes of the Green Belt is set out later on. Land which makes a ‘strong’ contribution to a purpose is considered to ‘strongly contribute’ against that purpose. Land which makes a ‘moderate’, ‘weak’, or ‘no’ contribution to the purpose is not considered to ‘strongly contribute’ against that purpose.

Footnote 7 sites

- M1.20 Footnote 7 sites include:
- Habitats sites: Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites; potential Special Protection Areas; possible Special Areas of Conservation; listed or proposed Ramsar sites; sites identified, or required, as compensatory measures for adverse effects on habitats sites.
 - Sites of Special Scientific Interest.
 - Local Green Space.
 - National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast.
 - Irreplaceable habitats: ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh, lowland fen.
 - Designated heritage assets, Listed Buildings, Conservation Areas.
 - Areas at risk of flooding or coastal change.
- M1.21 This appraisal offers a high-level consideration of whether footnote 7 assets or areas may provide a strong reason for refusing or restricting development.

Inappropriate Development within the Green Belt

- M1.22 Paragraph 153 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 154 states that development is inappropriate in the Green Belt. Before setting out a series of circumstances where development would not be inappropriate, with some provisos. Paragraph 155 sets out further circumstances where development would not be inappropriate, with some provisos.

M1.23 The PPG provides additional guidance on the application of Paragraph 155, including the Golden Rules requirements set out in Paragraphs 156 and 157. In relation to point c of Paragraph 155, paragraph 011 of the PPG notes that sustainable locations include those that can be made sustainable. In relation to point c of Paragraph 156, paragraph 012 of the PPG notes that the following contributions to accessible green space should be considered:

- *'New residents and the wider public should be able to access good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.'*
- *Accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions.*
- *Where possible access to green spaces should include safe active travel routes and should be served by public transport, which also means providing the necessary infrastructure (such as footpaths and bridleways).*
- *Proposals should consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.*
- *Where appropriate, authorities should consider the use of conditions or planning obligations. The Community Infrastructure Levy can also be used to fund improvements to existing greenspaces or the provision of new ones. Local authorities should consider arrangements for the long-term maintenance of green spaces.'*

M1.24 This Green Belt Assessment therefore considers whether development is inappropriate, or whether it falls within one of the exceptions.

Openness of the Green Belt

M1.25 Paragraph 153 refers to 'any other harm resulting from the proposal', and it is considered that the effect on the openness of the Green Belt is one such factor which falls within the 'any other harm' category. Therefore, the effect of the development on the openness of the Green Belt is considered where development is inappropriate, in order to consider the weight to be given to 'any other harm'.

M1.26 Some of the exceptions to inappropriate development set out within paragraphs 154 or 155, includes a proviso relating to the effect of development on the openness of the Green Belt. Therefore, the effect on the openness of the Green Belt is also considered within the Green Belt Assessment, in

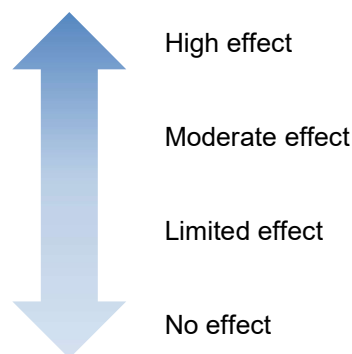
the instance where development is considered to fall within one of the potential exceptions to inappropriate development.

M1.27 There is no defined national or policy method to assess 'openness' beyond the guidance within the PPG, however, it is often assessed by considering the physical/spatial impact of development, such as the mass, the height, floor area etc.

M1.28 Visual openness is also a factor which is taken into consideration, including the visibility of the development (i.e. the Green Belt will visually appear less or more open (undeveloped) as a result of development). Visual openness can also be affected by development blocking a view towards the open land within the Green Belt.

M1.29 Openness is, however, an open concept, and other elements such as the spread of development within the site, the duration of the development, and the degree of activity and movement also play a role. The various elements which affect the openness will therefore be informed by this Methodology, however, it will also be informed by the specific characteristics of a site and its surroundings.

M1.30 The effect on openness is judged on a four-point word scale as set out below:



Purposes of the Green Belt

M1.31 The NPPF does not attach a hierarchy to the Green Belt purposes and it is assumed that each purpose is of equal importance. The National Planning Policy Guidance provides direction on how to assess the contribution of Green Belt land in relation to purposes a, b and d.

M1.32 The most relevant non-policy guidance in relation to Green Belt Assessment is published by the Planning Advisory Service ('PAS'), Planning on the Doorstep: the Big Issues – Green Belt (February 2015). This methodology has therefore also been informed by the PAS guidance, as well as through considering other evidence base reports which have been examined in public as part of Local Plan Examinations, and found acceptable.

- M1.33 There are two components to consider in relation to Green Belts: the value (contribution) of the land to the Green Belt in relation to the five purposes; and the potential harm to the purposes of the Green Belt of development of that land. In considering both the value and potential harm, we have taken other paragraphs within the NPPF into account, which, while not strictly policy, aid in expanding the concept of the value of the Green Belt. This includes paragraph 148 which refers to previously developed land and land that is well-served by public transport. Paragraph 149 refers to the requirement to not include land within the Green Belt which is not necessary to be kept open permanently, and sets out that Green Belt boundaries should be clearly defined, using physical features that are readily recognisable and likely to be permanent. Paragraph 151 includes commentary about positive enhancements to the beneficial use of Green Belts, such as providing access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.
- M1.34 Harm to the purposes of the Green Belt as a result of inappropriate development should be considered within the 'any other harms' category as set out within NPPF paragraph 153. It must also be considered when assessing whether development complies with the exceptions listed in paragraph 154(b and h) and 155(a).
- M1.35 The PAS advice note states that some of the five Green Belt purposes will be more relevant, or important, than others. Below, we consider the five purposes in more detail.

Purpose a: to check the unrestricted sprawl of large built-up areas

- M1.36 The purpose refers to 'large built up areas'. Paragraph 005 of the PPG notes that villages should not be considered large built-up areas, and this purpose does therefore not relate to villages, hamlets, or washed-over settlements (noting, however, that sprawl anywhere is an undesirable characteristic). Large built-up areas are therefore considered to comprise towns or cities.
- M1.37 The PAS advice notes that the terminology of 'sprawl' comes from the 1930s when Green Belt was conceived, and it poses the question of whether development that is planned positively through a Local Plan, and well designed with good masterplanning, constitutes sprawl. The early Green Belt helped prevent ribbon development which was prevalent at the time (i.e. single plot depth development to one of either side of existing or new roads, often extending out of the settlement into the countryside). Therefore, ribbon development is one way in which sprawl can be defined. Sporadic or dispersed development on the edge of a settlement could also be seen as sprawl, as can development which extends beyond a clear settlement boundary following a physical element, such as a river or main road. 'Untidy' or scattered development, incongruous patterns of development, and areas of unplanned expansions over a period of time, could also be considered as sprawl. This is reflected in paragraph 005 of the PPG which notes land as having a strong contribution to purpose a as resulting in an *'incongruous pattern of development (such as an extended "finger" of development into the Green Belt)'*.

- M1.38 However, sprawl can similarly be contained, or the appearance of sprawl can be mitigated by, amongst others, maintaining a clear separation between the settlement and the countryside beyond. In this regard, the NPPF notes in paragraph 149(f), that Local Plans should define Green Belt boundaries '*clearly, using physical features that are readily recognisable and likely to be permanent.*' This is reinforced within the PPG which notes land as having a strong contribution to purpose a as lacking '*physical feature(s) in reasonable proximity that could restrict and contain development*'. Potential Green Belt boundaries are considered in Section M1.60.
- M1.39 Criteria to consider in relation to the contribution of the land to purpose a:
- The land's relationship to a large built-up area, including its degree of containment by existing development and presence of other urbanising influences;
 - Degree of openness, and how much built development already occurs;
 - The current character of the settlement or Green Belt edge, and whether it follows a clearly identifiable and defensible boundary; and
 - The occurrence of other potential defensible boundaries, and whether they are clearly identifiable, permanent, regular, amongst others.
- M1.40 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with Table 1.1. This aligns with the illustrative features identified within paragraph 005 of the PPG. The harm to the purpose as a result of development of the land is judged in accordance with Table 1.2.

Table 1.1 Contribution to Purpose a	
Strong	Land which makes a strong contribution to purpose a is likely to be free of existing development and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following: • Be adjacent or near to a large built up area; and • If developed, result in an incongruous pattern of development (such as an extended “finger” of development). Land which makes a strong contribution is likely to have existing very strong boundaries and/or no physical features to form a new settlement edge. It is likely to be clearly outside of the existing settlement, have little to no containment and/or be a very open landscape. It is also likely that there is no or limited sprawl evident nearby.
Moderate	Land which makes a moderate contribution to purpose a is likely to be adjacent or near to a large built-up area, but include one or more of the features that weaken the land’s contribution to purpose a, such as (but not limited to): • Having physical feature(s) in reasonable proximity that could restrict and contain development; • Be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development; • Contain existing development; and/or • Being subject to other urbanising influences. Land which makes a moderate contribution is likely to have existing clearly identifiable boundaries, however, other potential boundaries also exist. It is likely to be mostly open with some containment and/or have some urbanising influences. Some sprawl may be evident near the settlement, but is not connected to it.
Weak or None	Land which makes a weak or no contribution to purpose a is likely to: • Not be adjacent to or near to a large built-up area; or • Be adjacent to or near to a large built-up area, but is containing or largely enclosed by significant existing development. Land which makes a weak contribution towards purpose a is likely to be adjacent to or in proximity to a large built-up area. It is likely to have a weak existing boundary and strong potential new boundaries. It is likely to be well contained and have existing urbanising influences. Some sprawl is likely to occur in proximity. Land which makes no contribution towards purpose a is likely to not be adjacent to or in proximity to a large built-up area. If it is adjacent to a large built-up area, it is likely that it is very well contained and that there is no clear distinction between development within the Green Belt and that outside of it. There are likely to be no clearly identifiable existing boundaries, but strong potential boundaries. It is likely that sprawl adjoins the settlement.

Table 1.2 Harm to Purpose a	
High	Development which would cause high harm to purpose a is likely to be perceived as sprawl without clear boundaries, and would not be well related to the settlement. It is likely to include ribbon and scattered development, or be particularly incongruous with the existing settlement form. It is likely that no edge to the settlement would be identifiable.
Moderate	Development which would cause moderate harm to purpose a is likely to constitute sprawl, but the extent would be minor, and some containment would occur. Development might be well related to existing sprawl, and therefore have a limited additional impact. Development might be well related to the settlement and well-planned, but there may be no clearly identifiable boundaries.
Limited or None	Development which would cause limited harm to purpose a is likely to be planned and would form an extension to the existing large built-up area. It is likely that a clearly identifiable new settlement boundary would be present. Development would be regular in form and at least partially enclosed. Development which would cause no harm to purpose a is likely to not adjoin a large built-up area. Development which does adjoin a large built-up area would be well contained on all sides or could consolidate existing sprawl. It is likely to create an identifiable settlement edge.

Purpose b: To prevent neighbouring towns from merging into one another

- M1.41 This purpose specifically refers to towns, not villages, as highlighted in paragraph 005 of the PPG.
- M1.42 The nature and size of the perception of separation are important considerations in determining the role that a land parcel plays in maintaining separation between towns. The PAS guidance states that when assessing this purpose, *‘a ‘scale rule’ approach should be avoided. The identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land between must be taken into account.’*
- M1.43 In cases where coalescence has already occurred elsewhere between the towns, it is necessary to consider the importance or value of maintaining the remaining separation. If the towns are already indistinguishable from each other, then there is little value in maintaining a ‘token’ area of separation, if it would either not be meaningful or functional, or if it is considered that there is no need to retain separation for the sake of it.
- M1.44 Criteria to consider in relation to the contribution of the land to purpose b:
- The perceptual distance between towns;
 - Intervisibility, or visual separation;
 - The role of landform or landcover in ensuring separation;
 - The individual characters of the towns;
 - Identifiable settlement boundaries or separating features, such as motorways for example; and
 - The effect of development on the perception of transition between towns, i.e. would you clearly leave one town and enter the next if the land were to be developed.

M1.45 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with Table 2.1. This aligns with the illustrative features identified within paragraph 005 of the PPG. The harm to the purpose as a result of development of the land is judged in accordance with Table 2.2.

Table 2.1 Contribution to Purpose b	
Strong	Land which makes a strong contribution to purpose b is likely to be free of existing development and include all of the following features: • Form a substantial part of a gap between towns; and • The development of which would result in the loss of visual separation of towns. Land which makes a strong contribution to purpose b is likely to be perceived as occupying the whole or vast majority of the physical gap between towns which are currently separate. The land is likely to form the last area of separation between towns which have already merged elsewhere, and where the land perceptually functions as a separating feature, where judged necessary. Development of the land is likely to have the consequence of perceptually merging the towns or substantially reducing their separation to the point that the separate identities of the towns are no longer recognisable.
Moderate	Land which makes a moderate contribution to purpose b is likely to be located in a gap between towns, but include one or more features that weaken the land's contribution to purpose b, such as (but not limited to): • Forming a small part of the gap between towns; and/or • Being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural elements or topography that preserve visual separation. Land which makes a moderate contribution to purpose b is likely to form part of a wider perceived gap between towns. It is likely that some boundaries or features occur which would ensure separation. Towns are likely to have clear boundaries at the moment, but potentially new clear boundaries also exist. There is likely to be limited coalescence that has already taken place, and the land prevents the perception of further coalescence. Development on the land would likely reduce the perceived separation of towns, but the separate identities of the towns would remain recognisable.
Weak or None	Land which makes a weak or no contribution to purpose b is likely to: • Not form part of a gap between towns; or • Does form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation. Land which makes a weak contribution to purpose b is likely to form part of a substantial gap between towns which are clearly separate. It is likely that there are several clearly separating features occurring between the towns. In some cases, much coalescence has already occurred, and additional low levels of coalescence would not change the overall separate identities of the towns. It is likely that development on the land would not materially affect the perceived separate identities of the towns. Land which makes no contribution to purpose b is likely to not be located between two towns. Where the land is located between two towns, it is likely that the distance between the towns is significant, and the two towns remain clearly identifiable. Alternatively, the land occupies a gap which is judged to provide no meaningful or functional separation between towns which have already merged.

Table 2.2 Harm to Purpose b	
High	Development which would cause high harm to purpose b would likely cause towns which are currently separate, to coalesce, either physically or visually. Development would likely occupy the final identifiable area of physical or visual separation between towns which have already coalesced.
Moderate	Development which would cause moderate harm to purpose b would likely bring towns closer to each other, but clear boundaries or clearly identifiable intervening undeveloped land will ensure their perceived separation and separate identities are maintained. Development will likely increase coalescence where it already occurs and substantially reduce the clear perception of separation.
Limited or None	Development which would cause limited harm to purpose b would likely bring towns closer to each other, but clear boundaries and clearly identifiable, large areas of intervening undeveloped land will ensure their separation and separate identities are maintained. Development would likely lead to coalescence where towns are already not separately identifiable. Development which would cause no harm to purpose b is likely not be located within a gap between towns, or would not lead to any perception of coalescence.

Purpose c: To assist in safeguarding the countryside from encroachment

- M1.46 The PAS advice notes that, presumably, all Green Belt assists in safeguarding the countryside from encroachment, making the purpose difficult to use to distinguish the contribution of different areas. The PAS also notes that the most useful approach is to look at the difference between urban fringe – land under the influence of the urban area; and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved.
- M1.47 Countryside is not defined within the NPPF, and in planning policy terms it most often refers to land outside of the settlement boundary. If the fundamental aim of Green Belts is to prevent urban sprawl and keep land permanently open, then it follows that countryside is undeveloped, and open.
- M1.48 This purpose therefore relates to the character and function of the landscape, to an extent, and the extent to which it displays a 'countryside' character. For the purposes of this assessment, land that is clearly countryside is considered to be rural, with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields. On the other side of the land use and openness scale are urban areas, and clearly identifiable settlements. However, the use and character of land often falls between these two sides, and is often described as having a semi-rural/urban, urban fringe, or settlement edge character.
- M1.49 The second main consideration relates to the extent of encroachment, and whether any containment exists which would limit the actual or perceptible encroachment. Encroachment into a landscape with no clearly defined boundary features to curtail further development or encroachment, will have a larger impact on this purpose than encroachment into a landscape which is separated from the wider

adjoining countryside by clearly identifiable features. A planned urban extension on the periphery of a settlement is likely to encroach on the wider countryside, and consideration of this purpose should assess the ability of the land parcel to accommodate change and its impact on the wider countryside.

M1.50 Criteria to consider in relation to the contribution of the land to purpose c:

- Land use on site;
- Character of site;
- Effect on character of site from adjoining land uses;
- Connection to adjoining settlement, and connection to adjoining countryside; and
- Occurrence of clear boundaries between the settlement and the countryside.

M1.51 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with table 3.1. The harm to the purpose as a result of development of the land is judged in accordance with table 3.2.

Table 3.1 Contribution to Purpose c	
Strong	Land which makes a strong contribution to purpose c is likely to be clearly rural and undeveloped. The existing settlement edge is likely to be very strong and no other equally strong potential boundary exists in the area.
Moderate	Land which makes a moderate contribution to purpose c is likely to be predominantly rural and undeveloped with some urbanising influences. The existing settlement edge is clearly identifiable, but other potential clearly identifiable boundaries occur in the area.
Weak or None	Land which makes a weak contribution to purpose c is likely to be mostly developed and/or is not characteristic of rural countryside due to urbanising influences. The settlement edge is either well defined or not well defined, however, clearly identifiable potential boundaries occur within the area. Land which makes no contribution to purpose c is likely to be clearly developed. Strong boundaries exist which would form a new settlement edge and potential Green Belt boundary.

Table 3.2 Harm to Purpose c	
High	Development which would cause high harm to purpose c would likely occur on open, undeveloped land. Development would likely not be clearly adjoined to the settlement, and would not be clearly separated from the countryside. There would be no clear boundary between the settlement and the countryside, and the wider Green Belt would be vulnerable to further development. The development would likely affect the rural character of the wider Green Belt.
Moderate	Development which would cause moderate harm to purpose c would likely occur on mostly undeveloped land, but would be adjoined to the existing settlement. Some extension of the settlement into the countryside would occur, but it is likely that clearly identifiable boundaries will create a firm boundary between the settlement and the wider countryside. There will be no significant effect on the wider Green Belt, which will remain countryside.
Limited or None	Development which would cause limited harm to purpose c would likely occur on land which contains much existing development, and which cannot be described as rural. Development will form an extension to the settlement and will be well contained from the wider Green Belt by clearly identifiable boundaries. Development which would cause no harm to purpose c would likely be located on land which is mostly developed and which does not reflect rural or countryside characteristics. Development will clearly form part of a settlement, and will not extend the settlement into the adjoining open countryside.

Purpose d: To Preserve the Setting and Special Character of Historic Towns

- M1.52 The PAS advice notes that this purpose is generally accepted as relating to very few settlements in practice. This is reinforced through paragraph 005 of the PPG which notes that where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose. In most towns there already are more recent developments between the historic core, and the countryside between the edge of the town.
- M1.53 We also note that the purpose refers to historic towns, so this excludes modern towns, and also smaller settlements such as villages, as highlighted in paragraph 005 of the PPG. That does not mean that the character or openness of land around a historic village should not be preserved, but simply that it is not the purpose of the Green Belt to do that.
- M1.54 Criteria to consider in relation to the contribution of the land to purpose d:
- Is the settlement a historic town;
 - Does the land contribute to the setting or character of the historic town;
 - Is there modern development between the land and the historic town (i.e. usually the historic core), which affects the role of the land within the Green Belt;
 - Conservation Area Appraisals and guidance;
 - Visual relationship between historic core and wider countryside; and
 - Views to landmark buildings in historic core.

M1.55 The contribution and value of the land to the purpose of the Green Belt is judged in accordance with Table 4.1. This aligns with the illustrative features identified within paragraph 005 of the PPG. The harm to the purpose as a result of development of the land is judged in accordance with Table 4.2.

Table 4.1 Contribution to Purpose d	
Strong	Land which makes a strong contribution to purpose d is likely to be free of existing development and to include all of the following features: • Form part of the setting of a historic town; and • Make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town. Land which makes a strong contribution to purpose d is likely to comprise the whole, or a principal part of, the visual or physical setting of a historic town. The land is likely to be located adjacent to the historical parts of the town.
Moderate	Land which makes a moderate contribution to purpose d is likely to form part of the setting and/or contribution to the special character of a historic town but include one or more features that weaken its contribution to this purpose, such as (but not limited to): • Being separated to some extent from historic aspects of the town by existing development or topography; • Containing existing development; and/or • Not having an important visual, physical, or experiential relationship to historic aspects of the town. Land which makes a moderate contribution to purpose b is likely to form part of the setting of a historic town. It is likely that there is very limited intervening modern development, and that there is a direct relationship between the land and the historic elements of the town.
Weak or None	Land which makes a weak or no contribution to purpose d is likely to: • Not form part of the setting of a historic town; or • Have no visual, physical, or experiential connection to the historic aspects of the town. Land which makes a weak contribution to purpose d will adjoin a historic town. There may be views of historical elements from the land, which may contribute to the wider setting. However, it is likely that there is no direct association between the historical town and the land. Land which makes no contribution to purpose d may or may not adjoin a historic town. Where it does adjoin a historic town, the historic core is likely to be separated from the land by much intervening modern development. There is likely to be no visual connection of importance (i.e. beyond incidental) between the land and the historic core of the town.

Table 4.2 Harm to Purpose d	
High	Development which would cause high harm to purpose d would likely sever the connection between a historic town and its setting, or would significantly affect the special character of the historic town due to the loss of the open land.
Moderate	Development which would cause moderate harm to purpose d would likely intrude on the connection between the historic town and its setting, but the setting and special character would be maintained.
Limited or None	Development which would cause limited harm to purpose d would likely result in a very minor incursion into the setting of a historic town. Development would likely result in a minor alteration to an element which contributes to the special character of the historic town. Development which would cause no harm to purpose would either not be near a historic town, or there would be no or very limited intervisibility between the development and the historic town. The development would maintain all elements which contribute to the setting or special character of the historic town.

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

- M1.56 The PAS advice sets out that when a Council decides to release Green Belt land, it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land for development. If Green Belt achieves this purpose, then all Green Belt does so to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.
- M1.57 Previously developed land within the Green Belt, especially where the openness is affected, is, however, considered to perform less of a Green Belt function than greenfield sites.
- M1.58 Criteria to consider in assessing harm caused by development within the Green Belt in relation to purpose e:
- Is the land already developed;
 - Does the development affect its openness; and
 - Can the land be considered derelict.
- M1.59 The harm to the purpose as a result of development of the land is judged in accordance with Table 5.1.

Table 5.1 Harm to Purpose e	
High	Development which would cause high harm to purpose e is likely to be on undeveloped, open land. Evidence shows that there is sufficient derelict land or land within the settlement to accommodate the Council's required growth.
Moderate	Development which would cause moderate harm to purpose e is likely to be on partially developed land, but may extend beyond the existing built area. Evidence shows that there is sufficient derelict land or land within the settlement to accommodate the Council's required growth.
Limited or None	Development which would cause limited harm to purpose e is likely to be in an area where evidence shows that there is insufficient derelict land or land within the settlement to accommodate the Council's required growth. Development is on open and undeveloped land. Development which would cause no harm to purpose e is likely to be in an area where evidence shows that there is insufficient derelict land or land within the settlement to accommodate the Council's required growth. Development is on land which is already developed and not open, or on derelict land within the Green Belt.

Conclusion

M1.60 The PAS notes that the types of areas of land that might seem to make a relatively limited contribution to the overall Green Belt, or which might be considered for development through a review of the Green Belt according to the five Green Belt purposes, would be where:

- it would effectively be 'infill', with the land partially enclosed by development;
- the development would be well contained by the landscape, e.g. with rising land;
- there would be little harm to the qualities that contributed to the distinct identity of separate settlements in reality; and
- a strong boundary could be created with a clear distinction between 'town' and 'country'.

M1.61 Paragraph 001 of the PPG notes that, as set out in national policy, the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process. In doing so, it is expected that authorities will identify grey belt land to inform the review and prioritisation of land for development. The identification of grey belt land should also be considered against paragraph 155 of the NPPF, which sets out the conditions in which development would not be inappropriate development on grey belt land.

Green Belt Boundaries

M1.62 The consideration of the effectiveness of the existing Green Belt boundaries is also taken into consideration in the assessment of the land. The NPPF states that boundaries should be defined *'clearly, using physical features that are readily recognisable and likely to be permanent'*.

- M1.63 Where Green Belt boundaries follow the rear of existing housing on the edge of a settlement, these can lack visual containment and result in a poor relationship between the edge of the settlement and the adjoining land parcel. Where the boundary along rear gardens on a settlement edge is more irregular or complicated, or where it crosses rear gardens, it is likely the case that the Green Belt boundary is not well defined along clearly identifiable features. In such cases, consideration should be given to whether an improved boundary could be provided through planned expansion.
- M1.64 Clearly identifiable physical, recognisable, and likely permanent features include:
- Major transport infrastructure, including roads and railways;
 - Landscape features including woodland blocks or belts, and watercourses;
 - Topography, such as ridgelines; and
 - Public rights of way.
- M1.65 Hedgerows, dependent on their character, would usually form a less clearly identifiable boundary, and private roads would form a less permanent feature for a boundary, however, these elements could also be used to align Green Belt boundaries.
- M1.66 When considering the performance of land against the Green Belt purposes, the presence of alternative, durable boundaries can help reduce the perception of sprawl, countryside encroachment and loss of separation. In addition, release of land will typically form part of a planned extension, and consideration should be given to whether new appropriate Green Belt boundaries can be created.