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# Land to the north of Little Green Lane, Croxley Green

Green Belt Proof of Evidence  
by Silke Gruner BHons (Landscape Architecture) CMLI

Appeals reference: 6004972  
LPA reference: 24/2073/OUT

On behalf of Richborough

July 2026

OF

ON BEHALF  
RICHBOROUGH

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Land to the north of Little Green Lane,  
Croxley Green  
GREEN BELT PROOF OF EVIDENCE

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## APPENDIX

A1. Green Belt Impact Assessment Methodology

|                  |                                                                                      |
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| Document title:  | Land to the north of Little Green Lane, Croxley Green<br>Landscape Proof of Evidence |
| Document Number: | I000010_DL 104                                                                       |
| Date:            | July 2026                                                                            |
| Author:          | SG                                                                                   |

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## 1. EXECUTIVE SUMMARY AND CONCLUSION

- 1.1 This Proof of Evidence has been prepared by Silke Gruner ((BHons) Landscape Architecture, CMLI), Director (Landscape) of Icen Projects, instructed by Richborough in relation to their appeal against the refusal by Three Rivers District Council of an outline application at land to the north of Little Green Lane, Croxley Green. The Appeal Site lies within the Green Belt.
- 1.2 Three Reasons for Refusal were given in the Decision Notice (dated 30 January 2026). My Proof of Evidence is concerned with the Green Belt matters in Reason for Refusal 1. Since the Appeal was made, the Council have withdrawn Reason for Refusal 1 relating to the Green Belt, and also Reason for Refusal 2 relating to the Ancient Woodland. However, to ensure the Inspector has the information they require to make a decision, I have set out within my Proof of Evidence why the Appeal Site is considered to be grey belt. The evidence of Mr Austin-Fell deals with planning policy, and sets out why development at the Appeal Site would not amount to inappropriate development in the Green Belt, and also considers the overall planning balance.
- 1.3 I have considered the Green Belt evidence base produced on behalf of the Council. The Stage 1 Green Belt assessment considers a strategic parcel area, of which the Appeal Site only forms a small part, and its conclusions are therefore of limited relevance to the Appeal Site itself.
- 1.4 The Stage 2 Green Belt assessment considered Parcel CG8, which, for the most part, reflects the boundary of the Appeal Site. However, the study predates the updated 2024 NPPF and 2025 PPG, and it was not produced in order to consider the contribution of land to the purposes of the Green Belt, nor to identify grey belt. Indeed, that study assessed the harm to the purposes of the Green Belt if the land were released and developed. The study assessed the overall Green Belt harm and any variations of harm within Parcel CG8 that could follow the release of land, finding this to be 'Moderate-High' on the grounds that:
- 'Release of the parcel would have a significant impact on preventing urban sprawl and encroachment on the countryside. However, its release would only have a negligible impact on the adjacent Green Belt due to its containment by Cassiobury Registered Park and Garden and ancient woodland. It is therefore concluded that the harm to the Green Belt of releasing this land would be moderate-high'* (my underlining).
- 1.5 Finally, in an assessment of 'Harm beyond outer boundary', the study concluded that:
- 'Whippendell Wood forms a significant area of constraint preventing development to the east and north. To the west, ancient woodland borders most of the parcel, creating a strong boundary beyond which any development would constitute high harm.'*

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- 1.6 I have considered the Stage 4 Green Belt assessment, and I find that the methodology utilised within the assessment, as well as the reassessment of Parcel CG8 which contains the Appeal Site, to be unsound and flawed, and the findings of that study can therefore not be relied upon.
- 1.7 I have assessed the Appeal Site's contribution to purposes (a), (b) and (d) of the Green Belt, in order to ascertain if the Appeal Site constitutes grey belt. The Appeal Site is assessed as making a **moderate contribution** to purpose (a), as it benefits from physical features in the near vicinity which could restrict and contain development, and as development on it would not result in an incongruous pattern of development. The Appeal Site makes a **moderate contribution** to purpose (b) as it lies between towns, but there would be no loss of visual separation if the Appeal Site were to be developed. The Appeal Site makes **no contribution** to purpose (d) as there are no historic towns where the Green Belt plays a role in their specific character within the Three Rivers District.
- 1.8 The Appeal Scheme has been considered against footnote 7 assets and areas, and it is concluded that the application of the policies relating to the footnote 7 areas or assets would not provide a strong reason for refusal of the development at the Appeal Site.
- 1.9 The Appeal Site therefore constitutes grey belt.
- 1.10 Section 6 sets out that the development of the grey belt at the Appeal Site will comply with part (a) of paragraph 155 of the NPPF, and it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. This is due to the small scale of the Appeal Site in relation to the wider Green Belt in the plan area, its location at the edge of the Green Belt in the plan area and adjoining the existing settlement, and the fact that the Appeal Site is very well contained by physical features from the wider Green Belt.
- 1.11 The evidence of Mr Austin-Fell considers the remaining parts of paragraph 155, and concludes that the proposed development at the Appeal Site is not inappropriate development.

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## **2. QUALIFICATIONS AND EXPERIENCE**

- 2.1 This Proof of Evidence has been prepared by Silke Gruner ((BHons) Landscape Architecture, CMLI), Director (Landscape) of Icen Projects. I have an honours degree in Landscape Architecture, and a Graduate Diploma in Urban Design and Place Shaping. I have been a Chartered Member of the Landscape Institute since 2007.
- 2.2 I am employed at Icen Projects who provide specialist advice in the fields of archaeology; built heritage and townscape; design; economics; engagement; Icen futures; impact management; and planning and transport. They work from regional offices within the UK and have a national project and client base. I have over 20 years of experience in undertaking landscape and visual assessments, and in masterplanning and urban design.
- 2.3 I have given Green Belt, landscape, and urban design advice on numerous schemes, and I have given landscape evidence at Section 78 Inquiries as well as at Local Plan Examinations.
- 2.4 The evidence I have prepared and provide for this appeal is true and has been prepared in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

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### 3. BACKGROUND

- 3.1 This Proof of Evidence has been instructed by Richborough (the 'Appellant') in relation to their appeal against the refusal by Three Rivers District Council (the 'Council') of an outline application at land to the north of Little Green Lane, Croxley Green ('the 'Appeal Site') for:

*Development of up to 600 residential dwellings (Use Class C3(a)), construction of a 5-bedroom property for children's social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two form entry primary school). A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and cafe provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (Layout, scale, appearance and landscape as reserved matters).*

- 3.2 Three Reasons for Refusal were given in the Decision Notice (dated 30 January 2026). My Proof of Evidence is concerned with the Green Belt matters in Reason for Refusal 1. The Reason for Refusal alleges:

*'The proposed development constitutes inappropriate development within the Green Belt which is by definition harmful to the Green Belt. In addition the development would also result in actual harm to the openness of the Green Belt and would conflict with purposes (a) and (c) of including land within the Green Belt. No Very Special Circumstances exist to outweigh the harm that would be caused by the proposed development by virtue of its inappropriateness and other harm it would cause. The proposed development would therefore be contrary to Policy CP11 of the Core Strategy (adopted October 2011), Policy DM2 of the Development Management Policies LDD (adopted July 2013) and Section 13 of the NPPF (2024).'*

- 3.3 In April 2026, the Council notified the parties that they would no longer be pursuing Reason for Refusal 2 pertaining to Ancient Woodland. In June 2026, the Council notified the Appellant and the Planning Inspectorate that it wished to formally withdraw Reason for Refusal 1, which related to Green Belt. A Statement of Common Ground has since been agreed between the Appellant and the Council, agreeing that the Appeal Site does not make a strong contribution to purpose (b) and purpose (d) of the Green Belt (**CD8.1**, paragraphs 6.10-6.11). Considering the agreements in relation to purpose (a) (paragraphs 6.12-6.20), it has to be concluded that the Appeal Site does not make a strong contribution to purpose (a), and is therefore capable of being grey belt.

- 3.4 However, to ensure the Inspector has the information they require to make a decision, I have set out within my Proof of Evidence why the Appeal Site is considered to be grey belt.

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- 3.5 The evidence of Mr Austin-Fell deals with planning policy, and sets out why development at the Appeal Site would not amount to inappropriate development in the Green Belt, and also considers the overall planning balance.

### **Methodology**

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- 3.6 I undertook the Landscape and Visual Impact Assessment and Green Belt Assessment ('LVIA'; **CD1.24**) which was submitted alongside the Application, and which included a Green Belt Assessment. The report was finalised before the publication of the 2024 NPPF updates and also the 2025 PPG updates.
- 3.7 I also wrote a Green Belt Assessment Addendum in March 2025 (**CD1.25**) to reassess the Appeal Site in line with the updated 2024 NPPF and 2025 PPG, and to consider if the Appeal Site constituted grey belt. The methodology for that assessment was based on the PPG. I concluded that the Appeal Site was grey belt.
- 3.8 To set out further detail in relation to the Appeal Site's contribution to purpose (a), I produced a further note which was submitted to the Council before the determination of the Application (**CD2.5**).
- 3.9 The methodology for our assessment of the Appeal Site's contribution to the Green Belt purposes is contained in **Appendix A1**.

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## 4. CONSIDERATION OF EVIDENCE BASE

### Three Rivers District Council & Watford Borough Council, Green Belt Review: Strategic Analysis (2017; CD7.21)

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- 4.1 Amec Foster Wheeler undertook a Stage 1 Green Belt Study ('GBA1') for Three Rivers District Council and Watford Borough Council in 2017 of 81 strategic parcels across the District and the Borough. In paragraph 1.1, the study sets out that *'The overall objective is to test the Green Belt against the five purposes set for it in the National Planning Policy Framework (NPPF) (para 80) and to determine the extent to which it is contributing to those purposes which are...'* In paragraph 2.2.10, the study notes that *'Each parcel was assessed for its contribution against the five Green Belt purposes as set out in national policy...'*
- 4.2 I would note that this study pre-dates the updated 2024 NPPF and 2025 PPG, and the findings can therefore not necessarily be applied directly to the consideration of grey belt.
- 4.3 The Appeal Site is located within Parcel C6 which extends to Sarratt Lane to the west, Redhall Lane and Rousebarn Lane to the north, Rousebarn Lane to the east, and a southern boundary provided by the built edge of Croxley Green. The Site forms the easternmost portion of Parcel C6, as shown on the plan below at Figure 4.1.

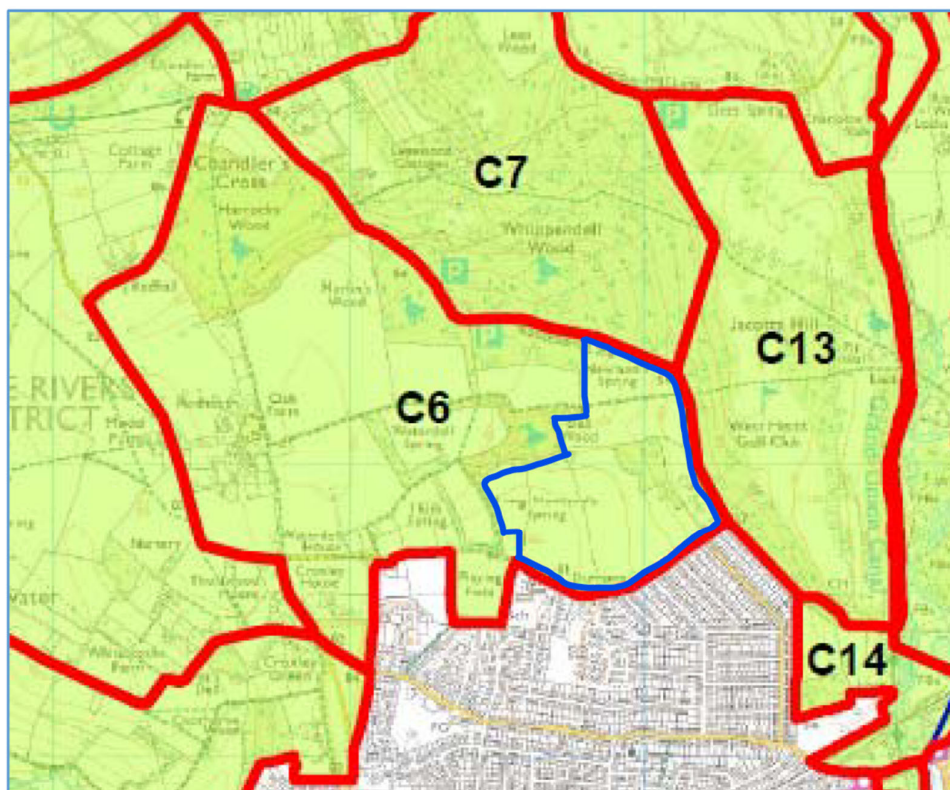


Figure 4.1: Extract from GBA1 showing location of Appeal Site in blue, in relation to Parcel C6.

4.4 Parcel C6 is described as:

*'School and playing fields to the east, pasture to the west with some isolated dwellings, mixed and medium scale arable, pasture and dense woodland to the north (Harrock's Wood), with a large school to the west and some isolated dwellings on the periphery. The land has a relatively remote rural character (notwithstanding proximity to Croxley Green to the southeast) and there are some extensive views across flat arable fields, although these are interrupted by blocks of woodland. Despite the proximity to the build edge of Croxley Green, generally the land has a relatively remote rural character.'*

4.5 The study assesses the role of Parcel C6 against the five purposes of the Green Belt as established in the NPPF. For each of the five purposes, the study scored the relative contribution of the parcel to the established purposes of the Green Belt along a three-point scale: *Significant Contribution*, *Contribution*, and *Limited Contribution*. A summary of these findings is shown in Table 4.1 below.

**Table 4.1 Summary of the contribution Parcel C6 makes to the NPPF purposes of Green Belt**

| Topic                                                       | Criteria                                                                                                                                                                                                                                                                                                              | Assessment                                                                                                                   |
|-------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| To check the unrestricted sprawl of large built up areas    | Prevent the sprawl of a built-up area into open land where development would not otherwise be restricted by a permanent boundary. 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? | CONTRIBUTION<br><br>Contains the northern edge of Rickmansworth.                                                             |
| To prevent neighbouring towns from merging into one another | Prevent development which would result in the merger or erosion of a gap (physically or visually) between settlements. What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?                                                     | LIMITED CONTRIBUTION<br><br>No role in this location.                                                                        |
| To assist in safeguarding the countryside from encroachment | Protect the openness of the countryside and its perceived rurality. What is the role of the parcel in maintaining a sense of openness, particularly in                                                                                                                                                                | CONTRIBUTION<br><br>Generally, helps to maintain the openness of the countryside in this location. Development is limited to |

|                                                                                               |                                                                                                                                                                                                                                   |                                                                                                                                                |
|-----------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                               | light of proximity to a settlement edge?                                                                                                                                                                                          | isolated farmsteads and some residential properties.                                                                                           |
| To preserve the setting and special character of historic towns                               | Preserve the setting and character of historic town. 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? | LIMITED CONTRIBUTION<br><br>No role in this location.                                                                                          |
| 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?                                                                                                      | LIMITED CONTRIBUTION<br><br>No role in this location.                                                                                          |
| 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?                                                                    | CONTRIBUTION<br><br>Part of open countryside between Croxley Green and the M25, containing sprawl and helping to prevent broader encroachment. |

4.6 The study also assesses Parcel C6 against an identified 'local role' of the Green Belt, and also the opportunities to promote positive use of the Green Belt. These are not relevant to my evidence, and I do not consider them further here.

4.7 In assessing the overall importance of Parcel C6, the report finds that the parcel 'Contributed' towards the purposes of the Green Belt established in the NPPF (on the three-point scale mentioned earlier).

4.8 This study recognised that further, more specific analysis of Green Belt would be required due to the pressure for development to meet housing needs in Three Rivers and Watford.

#### **Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough (2019; CD7.22)**

4.9 LUC was commissioned by Three Rivers District Council and Watford Borough Council to undertake a Stage 2 study of the Green Belt ('GBA2'). This study has formed part of the evidence base for the emerging Three Rivers and Watford Local Plans. I would again highlight that this study pre-dates the 2024 NPPF and 2025 PPG, and its findings cannot be directly applied to the consideration of grey belt, as I consider in more detail later on.

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- 4.10 The Stage 2 study involved an assessment of the potential harm to the Green Belt associated with the release of specific areas of land. The harm assessment considers the extent to which the release of different areas of land would reduce contribution to Green Belt purposes, through both the loss of openness of the released land and the resulting impact that this could have on the strength of the adjacent Green Belt. In paragraph 3.29 (**CD7.22**), the study notes that the Stage 2 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'.'*
- 4.11 The study notes in paragraph 3.105 that *'The harm judgement combines steps 1 and 2, considering on the one hand the impact of release in terms of loss of that land's contribution to Green Belt purposes and on the other the impact of release on the remaining Green Belt, to arrive at an overall judgement (my underlining).'*
- 4.12 I would highlight that this study is different in scope to the Stage 1 study, and that this Stage 2 study was not considering the 'contribution' of a parcel in relation to the NPPF purposes, but rather the resultant harm of development and release from the Green Belt.
- 4.13 A total of 152 parcels were identified within the Stage 2 study, with Parcel CG8 comprising broadly the same area as the Appeal Site (including HCC owned segment of land).
- 4.14 The impact of release of Parcel CG8 on the contribution to the purposes of the Green Belt was assessed within this study, with a focus on purposes (a)-(c), with purpose (d)<sup>1</sup> and purpose (e)<sup>2</sup> omitted from this study. A summary of these findings is shown in Table 4.2 below.

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<sup>1</sup> GBA2 paragraph 3.87 concludes that *'the Stage 2 study did not identify any historic towns which can be considered relevant in to the assessment of this Green Belt purpose.'*

<sup>2</sup> GBA2 paragraph 3.99 concludes: *'The extent to which Green Belt land would, if released, be capable of redirecting development away from brownfield sites, will in theory vary spatially, but there is no evidence that development pressures operate at a sufficiently localised level for variations in contribution to be identified within Watford and Three Rivers. Therefore the contribution of all Green Belt within Watford and Three Rivers is considered to be limited, and the Stage 2 study does not undertake any further assessment in relation to Purpose 5.'*

**Table 4.2 Summary of the impact of release on contribution of Parcel CG8 on the purposes**

| Purpose                                                     | Context                                                                                                                                                                                                                                                                                            | Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To check the unrestricted sprawl of large built up areas    | 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 on contribution (defined as: <i>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.</i> )                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| To prevent neighbouring towns from merging into one another | The parcel does not lie in the gap between neighbouring towns                                                                                                                                                                                                                                      | Limited or no contribution (defined as: <i>Development would have limited or no impact on the contribution to Purpose 2 as:</i><br><ul style="list-style-type: none"> <li>• <i>the land is not located within a gap between towns; or</i></li> <li>• <i>the land plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns;</i></li> </ul> <i>or</i><br><ul style="list-style-type: none"> <li>• <i>the land plays no significant role due to the extent of development;</i></li> </ul> <i>or</i><br><ul style="list-style-type: none"> <li>• <i>the land forms a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).</i>)</li></ul> |
| To assist in safeguarding the countryside from encroachment | The parcel has no urbanising influences and is uncontained countryside, giving it strong sense of openness. Little Green Lane creates some distinction from the inset edge but only to a minor extent                                                                                              | Significant impact on contribution (defined as: <i>Development would have a significant impact on the contribution to Purpose 3 as the land contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), is not itself contained by any urban development and has strong distinction from the inset settlement edge.</i> )                                                                                                                                                                                                                                                                                                                                                                                                                                                |

4.15 The study then assessed the potential impact of release of Parcel CG8 on the integrity of the remaining Green Belt, including consideration of the strength of residual Green Belt boundaries. In assessing the impact on adjacent Green Belt this study found:

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*'Releasing this land would have negligible impact on adjacent Green Belt land because the surrounding registered parkland and ancient woodland constraints mean there would be no significant increase in the containment of adjacent Green Belt land, nor any weakening of the boundary of the urban edge'* (my underlining).

- 4.16 The overall harm to Green Belt purposes as a result of release of the land was rated on a 7-point scale of *very high, high, moderate-high, moderate, low-moderate, low* and *very low*. The study assessed the overall Green Belt harm and any variations of harm within Parcel CG8 that could follow the release of land, finding this to be 'Moderate-High' on the grounds that:

*'Release of the parcel would have a significant impact on preventing urban sprawl and encroachment on the countryside. However, its release would only have a negligible impact on the adjacent Green Belt due to its containment by Cassiobury Registered Park and Garden and ancient woodland. It is therefore concluded that the harm to the Green Belt of releasing this land would be moderate-high'* (my underlining).

- 4.17 The study evaluated that *'there are no notable variations in harm within the parcel'* when assessing the 'Potential to Limit Harm'.

- 4.18 Finally, in an assessment of 'Harm beyond outer boundary', the study concluded that:

*'Whippendell Wood forms a significant area of constraint preventing development to the east and north. To the west, ancient woodland borders most of the parcel, creating a strong boundary beyond which any development would constitute high harm.'*

#### **Stage 4 Green Belt Review (September 2025, and February 2026; CD7.23)**

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##### **Unsound methodology**

- 4.19 I do not consider that the methodology for identifying grey belt land within the Stage 4 Green Belt Review, and in particular the contribution of land to purposes (a), is robust or sound.
- 4.20 Two Stage 4 Green Belt Reviews ('GBA4') were produced: one in September 2025, and a further in February 2026. Although the studies state that they include *'Grey belt identification following the key steps set out in the Green Belt Planning Practice Guidance'*, the assessment does not appear to undertake a substantive reconsideration of the land against the updated NPPF and PPG grey belt guidance. Rather, it appears principally to transpose the findings of the GBA2 into newly labelled categories.
- 4.21 Instead of undertaking a new grey belt assessment, the study, in the first instance, considered the GBA1 and GBA2 studies against the new policy and guidance within the updated NPPF and 2025

PPG to assess whether they are aligned and can continue to be relied upon going forward, or whether parcels require re-assessment. The study concluded that the approaches taken in GBA1 and GBA2 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 (section 4.7; **CD7.23**).

- 4.22 The study includes table 2 in section 4.3.2 (**CD7.23**), part of which is extracted and included at Figure 4.2 below.

| 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> |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

Figure 4.2: Extract from table 2 in GBA4.

- 4.23 The GBA4 concludes in section 4.3.1 in relation to GBA1 that: ‘*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.*’ Further on in this section, it concludes in relation to GBA2: ‘*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.*’
- 4.24 The PPG sets out clear guidance on considering the contribution of land to purposes (a), (b), and (d) of the Green Belt, and the methodology used in the GBA1 and GBA2 do not reflect this. I do not agree with the GBA4’s use of ‘illustrative factors’ in considering whether the methodologies of the GBA1 and GBA2 align with the updated PPG. The wording within the PPG is precise in using terms such as ‘all of’ the criteria, or ‘one or more’ of the criteria, and therefore, even if the GBA4 study concluded that the general factors were taken into consideration within the previous studies, the interrelationships between the factors and the land were not considered. If the PPG meant to only give a list of illustrative features, it would have done so.

- 4.25 Clearly, it would not have been possible to foresee the wording of the PPG at the time of writing the GBA1 or GBA2. Indeed, those studies were not undertaken in order to identify grey belt land, and it should therefore be expected that their methodologies would not be reflective of the PPG. The GBA4 does not take into account the relationship between the various illustrative factors and the land: a key part of the guidance within the PPG.
- 4.26 Indeed, the purpose of the assessments within GBA2 was to consider *'the extent to which the release of different areas of land affects the 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 adjacent Green Belt. This process involved an assessment of the harm to Green Belt purposes of releasing land for development to facilitate the expansion of inset settlements...'* (my underlining). It considers 'harm' and not 'contribution', as required within the PPG when considering grey belt. The GBA2 was written with a very different assessment outcome in mind. The conclusion in the GBA4 that, due to commonality in themes, the results can be directly read across to the identification of grey belt, is clearly wrong, and the findings of the GBA4 in relation to grey belt, are therefore not sound.
- 4.27 Table 4.3 reproduces table 6 from the GBA4, to show how the scores values from the GBA2 were matched to the PPG's *weak*, *moderate* and *strong* contribution. For ease, we have also included the definitions of the levels as set out within the GBA2 (in relation to purpose (a) only).

**Table 4.3 Table showing the GBA2 score translated to grey belt scale, as per GBA4**

| Stage 2 GBA score                                                                                                                                                                                                                                                                                                                  | Grey belt translation         |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| <b>Limited to No Impact:</b> <i>'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'</i>                                  | <b>Weakly contributes</b>     |
| <b>Relatively Limited Impact:</b> <i>'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'</i>                                            | <b>Weakly contributes</b>     |
| <b>Moderate Impact:</b> <i>'Development would constitute moderate sprawl as the land is close to the large built-up area, contains limited urban sprawl and has a relatively strong sense of openness. It may relate to both the settlement and the wider countryside or have a degree of separation from both'</i>                | <b>Moderately contributes</b> |
| <b>Relatively Significant Impact:</b> <i>'Development would have relatively limited impact on the contribution to Purpose 1 as the land is close to the large built-up area and already contains urban sprawl compromising the sense of openness, or it relates more strongly to the urban area than to the wider countryside'</i> | <b>Strongly contributes</b>   |

|                                                                                                                                                                                                                                                                                                                                                                                                                              |                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| <p><b>Significant Impact:</b> <i>'Development would have limited or no impact on the contribution to Purpose 1 as:</i></p> <ul style="list-style-type: none"> <li><i>• the land is close to the large built-up area but is already fully urbanised;</i></li> <li><i>• or the land is not close enough for there to be any potential for urban sprawl from the large built up area to occur within the parcel'</i></li> </ul> | <p><b>Strongly contributes</b></p> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|

4.28 There is no explanation in relation to the decisions taken in translating the impact/harm rating to the contribution rating. It clearly does not reflect the PPG guidance.

4.29 The September 2025 GBA4 was updated in February 2026, stating in section 4.7 (February 2026 GBA4; **CD7.23**): *'An appeal in Three Rivers in May 2025 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.'* This forms a change from the September 2025 GBA4, where it was concluded that the findings of the GBA2 could be read across directly to the identification of grey belt, although the February 2026 study still includes that conclusion.

#### **Parcel CG8 reassessment**

4.30 The February 2026 GBA4 appears to seek to address one of the methodological weaknesses by introducing an updated review of the Stage 2 GBR purpose (a) assessment, in Section 5. Within appendix 2 of the GBA4, there is an updated assessment of the parcels against purpose (a). It stated the scope of the updated assessment within section 5.1, as follows: *'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.'*

4.31 Section 5.2 of that study defines 'physical features'. Importantly, it identified 'Woodland – Ancient Woodland only' as a physical feature that can be deemed to represent a barrier to further sprawl beyond the parcel boundary. It notes that the scores in relation to purpose (a) were revised for 37 parcels. The parcel which contains the Appeal Site, parcel CH8, is one of these. I would note that there is no methodology for this re-assessment of parcel (a), beyond considering if there are physical features present.

- 4.32 Appendix A2 of the GBA4 reassess the study parcels against purpose (a), but only in relation to 'physical features'. The assessment for Parcel CG8 which broadly reflects the Appeal Site, is reproduced in table 4.4 below.

**Table 4.4 Table showing the reassessment of Parcel CG8, as per GBA4**

| Stage 2 GBA Purpose (a) text                                                                                                                                                                                                                                                                        | Stage 2 GBA purpose (a) score | Updated purpose (a) assessment                                                                                                                                                                                                                                                                                                                                                                                   | Updated purpose (a) score            |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| 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 sprawl. However, the parcel is contained by Whippendell Woods to the north-west limiting the parcel's role in containing urban sprawl. | <b>Relatively significant impact</b> |

- 4.33 The reassessment amounts to one further sentence, within the Ancient Woodland at Whippendell Woods noted in this one sentence as a containing feature which would limit the parcel's role in containing urban sprawl.
- 4.34 It is not credible that the GBA4 reassessment only reduces the score to 'relatively significant impact', and that the study considers the parcel therefore contributes 'strongly' to purpose (a), when the assessment clearly notes the Ancient Woodland as a containing and limiting, or restricting, feature, and particularly as Ancient Woodland is noted within the limited methodology in section 5.2 as being a physical feature that can be deemed to represent a barrier to further sprawl beyond the parcel boundary. Furthermore, GBA2 clearly states that *'Whippendell Wood forms a significant area of constraint preventing development to the east and north. To the west, ancient woodland borders most of the parcel, creating a strong boundary beyond which any development would constitute high harm.'*
- 4.35 In conclusion, both the methodology and the assessment of Parcel CG8 do not reflect the PPG, and cannot be relied upon to identify if the Appeal Site is grey belt or not.

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## 5. GREY BELT ASSESSMENT

5.1 The Glossary of the NPPF defines grey belt as follows:

*'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.'*

5.2 It has been agreed within the Statement of Common Ground (**CD8.1**) that the Appeal Site does not strongly contribute to purposes (b) or (d) of the Green Belt (paragraphs 6.10 – 6.11). Considering the agreements in relation to purpose (a) (paragraphs 6.12-6.20), it has to be concluded that the Appeal Site does not make a strong contribution to purpose (a), and is therefore capable of being grey belt.

### **Contribution - Purpose (a)**

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5.3 The PPG notes in relation to Green Belt (Paragraph: 005 Reference ID: 64-005-20250225), that *'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).'*

5.4 In other words, the PPG sets out that to make a strong contribution towards purpose (a), the land will likely demonstrate all three of the following:

- Lack physical feature(s) in reasonable proximity that could restrict and contain development;
- 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 into the Green Belt).

5.5 The PPG also sets out that where land adjoins a large built-up area, the contribution of the land to purpose (a) is likely to be weakened if one or more of the following features is present:

- 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; or

- 
- being subject to other urbanising influences.

### Physical features

- 5.6 Neither the NPPF nor PPG define 'physical feature(s)', 'reasonable proximity', or 'restrict and contain'. We would highlight that the definition and criteria of these requirements have not been clarified in case law, and Inspectors' Appeal Decisions do not take a consistent approach to this matter: they remain a judgement for the decision maker.
- 5.7 I agree with the GBA4 study which notes that Ancient Woodland is a physical feature which could restrict and contain development (however, I consider that most woodlands would fulfil this purpose).
- 5.8 I consider that the identified physical features, below, could restrict and contain development beyond the Appeal Site:
- To the east of the proposed development area within the Appeal Site: The unnamed Ancient Woodland south east of Dell Wood;
  - To the east of the Site: Rousebarn Lane, the dense woodland east of it, the rising ground east of the lane, and the occurrence of Cassiobury Park (which is a Registered Park and Garden);
  - To the north of the Site: Rousebarn Lane, Whippendell Wood (Ancient Woodland, SSSI, part of Registered Park and Garden);
  - To the north west of the Site: Hedgerows on the north eastern Appeal Site boundary, Merlin's Wood (Ancient Woodland) a short distance beyond within the near vicinity, Dell Wood (Ancient Woodland);
  - To the west of the Site: Woodland belt at Long Newland's Spring (Ancient Woodland).
- 5.9 Clearly, the Ancient Woodland around the Appeal Site is not going to be removed to accommodate further development. Therefore, this must form a physical feature which could restrict and contain development. Similarly, it would be highly unlikely that the woodland east of the Appeal Site within Cassiobury Park would be removed, or that Cassiobury Park west of the Appeal Site would be developed.
- 5.10 I acknowledge that there is a small part of the Appeal Site to the west which is bound by a hedgeline only. However, this forms a small connecting part within an otherwise very strongly defined physical boundary adjoining the Appeal Site. Considering the requirement to obtain planning permission for development, it would follow that even a line on a plan has the ability to restrict development. The

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Inspector in the Appeal Decision relating to Land West of Longwood Lane, Walsall<sup>3</sup> (**CD5.10**), noted in relation to that site, that the '*northern and southern boundaries are clearly defined by trees and hedgerows apart from the north-east corner where the land is more open around the paddock and access point... Conversely, it is conceivable that development could extend to the north of the site into the field parcels between the canal and Longwood Lane as trees and hedgerows in themselves are not a barrier to sprawl. This could continue unrestricted for several hundred metres to the A454 roundabout. However, additional development to the north is only hypothetical at this stage and would need to be assessed on its own merits, including an assessment under NPPF paragraph 155 to determine whether the land could be classified as grey belt*' (my underlining).

- 5.11 The Appeal Site does therefore not strongly contribute to this purposes, as it does not 'lack' physical features which could contain development. The other parts of the illustrative features set out within the PPG, are therefore not of relevance, as the Appeal Site's characteristic means it already falls below the threshold to be considered to 'strongly' contribute.

#### **Adjacent or near to large built-up area**

- 5.12 Paragraph 005 of the PPG notes that large built-up areas are considered to comprise towns or cities. As the Appeal Site benefits from physical features which could contain and restrict development, the status of Croxley Green as a large built-up area is not of particular relevance and I do not consider it further, as the Appeal Site does not strongly contribute to purpose (a) in any event. 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, taking a precautionary approach, it is considered to form part of a large built-up area for the purposes of this assessment.

#### **Pattern of development**

- 5.13 The development would form a logical extension, continuing the current north eastern extent of Croxley Green northwards, towards very clearly defined, and permanent, new settlement edges. The development would not, for example, form an extended 'finger' of development into the Green Belt.
- 5.14 To illustrate the fact that the proposed development will not appear as an extended 'finger' of development, nor incongruous in relation to the existing development pattern, we have produced a Figure Ground Plan, included in Figure 5.1, which shows the proposed development alongside the existing settlement pattern. Figure 5.2 shows the containment offered by the Ancient Woodland.

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<sup>3</sup> Appeal Ref: APP/V4630/W/25/3369937



Figure 5.1: Figure Ground plan showing the illustrative layout and the existing settlement as per the OS plan.



Figure 5.2: Figure Ground plan showing the illustrative layout and the existing settlement as per the OS plan, alongside the Ancient Woodland around the Appeal Site.

- 5.15 Recent appeal decisions have confirmed that development can extend beyond the existing settlement edge, and still be considered to conform with the settlement pattern, provided the site does not lack physical features which could contain development. In the Appeal Decision for Land south of Henclyffe Way and west of Castle Farm Road, Hanham<sup>4</sup> (**CD5.11**), the Inspector noted in paragraph 17: *'In this case, although the appeal site is free of existing development, it does possess physical features that could restrict and contain development – in particular ancient woodland to the west and south, and Castle Farm Road to the east. To the north east is the adjacent built-up area of Hanham, which forms part of the east fringe of the urban area of Bristol. The proposal would not result in an extended 'finger' of development, nor would it result in an incongruous, or obtrusive*

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<sup>4</sup> APP/P0119/W/24/3357956

pattern of development. Rather, it would simply shift the edge of residential development further to the southwest.' Figure 5.3 shows that site in relation to the existing settlement.

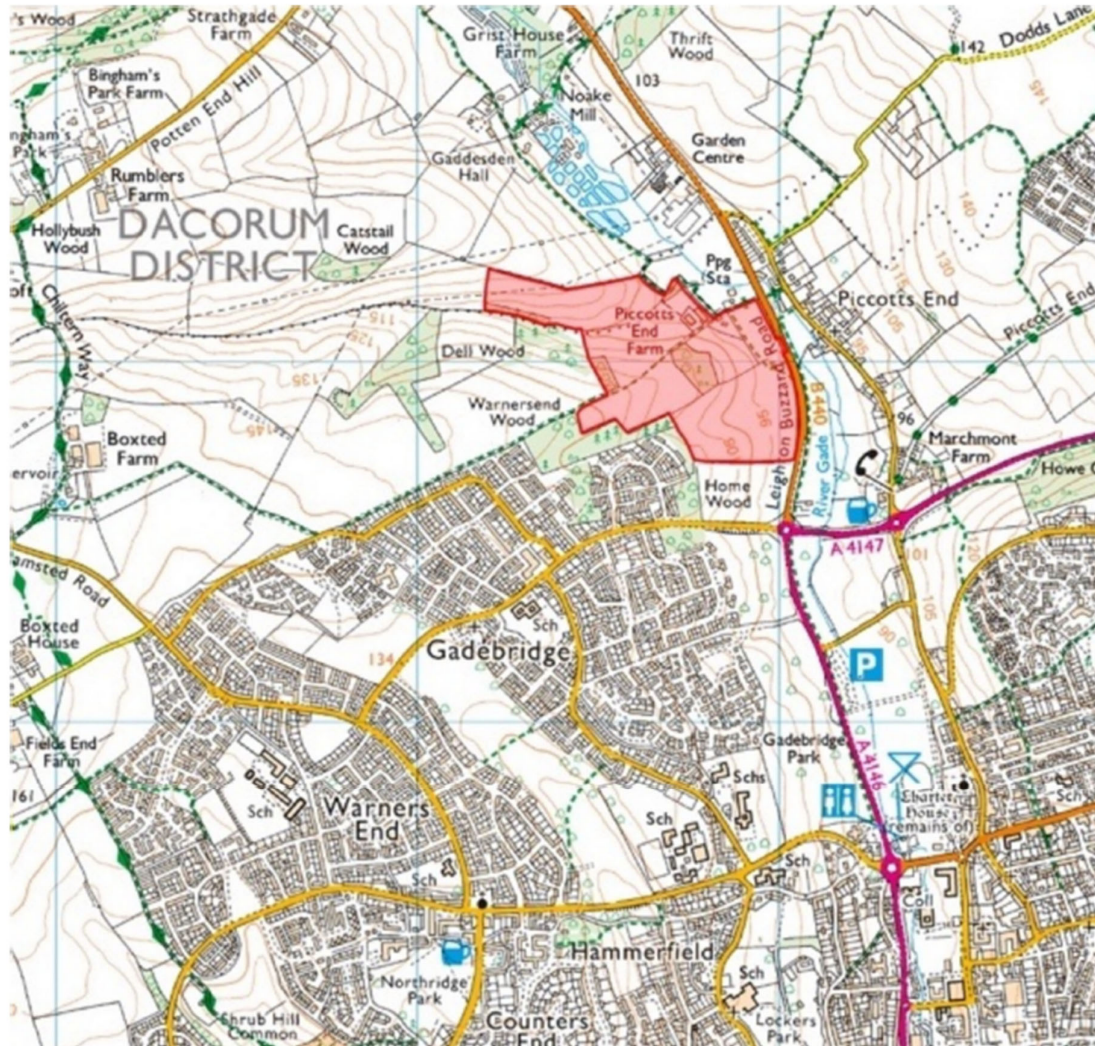


Figure 5.3: Location of Hanham site shown in red.

### Conclusion

- 5.16 The Appeal Site is assessed as making a **moderate contribution** to purpose (a), as it benefits from physical features in the near vicinity which could restrict and contain development, and as development on it would not result in an incongruous pattern of development.

### Contribution - Purpose (b)

- 5.17 This purpose specifically refers to towns, not villages, as highlighted in paragraph 005 of the PPG. The only town within the near vicinity of the Appeal Site is Watford. The nearest suburb of Watford lies around 1km east of the Appeal Site, however, Cassiobury Park, including the large wooded hill within it, comprises the space between the Appeal Site and Watford. The existing settlement at

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Croxley Green south of the Appeal Site beyond Baldwin Lane, and the settlement at Watford, are separated by a small area of open land along the Grand Union Canal and the River Gade, and the proposed development at the Appeal Site will therefore not decrease the existing gap between the settlements. The visual separation between towns will be maintained if the Appeal Site were to be developed. The Appeal Site therefore, makes a **moderate contribution** to this purpose.

#### **Contribution - Purpose (d)**

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- 5.18 The GBA2 notes in paragraph 3.83 (**CD7.22**): *‘Clearly there are historic aspects to towns and smaller settlements within the study area, but the important aspect in terms of contribution to this purpose is that there needs to be a significant relationship between Green Belt land and historic aspects of a settlement’s setting, such that some degree of special character results.’*
- 5.19 It concludes that the Stage 2 study did not identify any historic towns which can be considered relevant to the assessment of this Green Belt purpose.
- 5.20 Croxley Green is therefore not considered a historic town, but the Conservation Area to the west and south west of the Appeal Site protects the historic ‘green’ and its surroundings. The Appeal Site is physically and visually clearly separated from the Conservation Area.
- 5.21 The Appeal Site therefore makes **no contribution** to this purpose.

#### **Contribution – Conclusion**

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- 5.22 For the reasons set out above, the Appeal Site does not strongly contribute to purposes (a), (b), or (d) of the Green Belt, and could therefore be classified as grey belt, subject to footnote 7 considerations.

#### **Footnote 7**

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- 5.23 Footnote 7 features and areas relevant to the Appeal Site are:
- SSSI at Whippendell Wood;
  - Ancient Woodland at Whippendell Wood, Newland’s Spring, Dell Wood, Long Newland Spring, and unnamed woodland south west of Dell Wood;
  - Designated heritage assets at Cassiobury Park and Durrants House.
- 5.24 Whilst the Application was refused by the Planning Committee Members, the Planning Case Officer recommended that the Application be approved. The Planning Case Officer did not consider that the application of the policies relating to the footnote 7 areas or assets resulted in a strong reason to refuse planning permission.

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- 5.25 The Planning Committee, however, refused the Application, with Reason for Refusal 2 relating to impacts on the Ancient Woodland. During the Appeal process, the Council noted in their Statement of Case (**CD8.4**, paragraph 1.5) that they would no longer be pursuing Reason for Refusal 2 pertaining to Ancient Woodland. The effects on the Ancient Woodland resulting from the proposed development are therefore not considered to be a strong reason to refuse planning permission.
- 5.26 Therefore, the application of the policies relating to the footnote 7 areas or assets would not provide a strong reason for refusal of the development at the Appeal Site, and the Appeal Site therefore constitutes grey belt.

### **Conclusion**

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- 5.27 The Appeal Site does not contribute strongly to purposes (a), (b), or (d) of the Green Belt, and the application of the policies relating to the footnote 7 areas or assets would not provide a strong reason for refusal of the development at the Appeal Site.
- 5.28 The Appeal Site, therefore constitutes grey belt.

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## 6. NPPF PARAGRAPH 155 (a)

6.1 NPPF paragraph 155 states:

*'The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:*

*(a) 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;...'*

6.2 I have set out in Section 5 that the Appeal Site is grey belt.

6.3 The Appeal Site forms a small part of the overall Green Belt within the District (or plan area). It is located within the far south of the Green Belt, as shown on the plan in Figure 6.1. The Green Belt extends northwards from Little Green Lane. The Appeal Site is also adjacent to the Green Belt within Watford Borough, which extends to the Borough boundary along the eastern boundary of the Appeal Site. Considering the small scale of the development in relation to the wider Green Belt, I consider that the development of this parcel of grey belt on the edge of the plan area, and adjoining an existing settlement, would not fundamentally undermine the purposes of the remaining Green Belt across the area of the plan.

6.4 Development of the Appeal Site would not impact the ability of the adjoining Green Belt to the east or north to serve the Green Belt purposes. These areas comprise dense woodland, and their function in terms of all the Green Belt purposes would not change, in that they would continue to check unrestricted sprawl, prevent neighbouring towns from merging, safeguard the countryside from encroachment, and assist in urban regeneration. As set out within GBA2, no Green Belt land in the District contributes to purpose (d).

6.5 The land west of the Appeal Site will continue to be able to serve purposes (a), (b) and (e) to the same extent as they do now, and again, they make no contribution in relation to purpose (d). The land makes a similar contribution (i.e. moderate, as set out within the submitted Green Belt Assessment Addendum, **CD1.25**) to purpose (c) as the Appeal Site, being similarly located north of Croxley Heath, with similar levels of urbanising features. In any event, the proposed development at the Appeal Site would be clearly separate from the adjoining land to the west, which would clearly remain countryside. The development will not affect the ability of the land west of the Appeal Site to continue serving purpose (c).



Figure 6.1: Plan showing Green Belt within Three Rivers District (white boundary), with the Appeal Site identified in red.

- 6.6 Furthermore, as concluded in GBA2 (**CD7.22**) in relation to Parcel CG8 which includes the Appeal Site: *'Releasing this land would have negligible impact on adjacent Green Belt land because the surrounding registered parkland and ancient woodland constraints mean there would be no significant increase in the containment of adjacent Green Belt land, nor any weakening of the boundary of the urban edge'*.
- 6.7 In conclusion, the development of the grey belt at the Appeal Site will comply with part (a) of paragraph 155 of the NPPF, and it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.
- 6.8 The evidence of Mr Austin-Fell considers the remaining parts of paragraph 155, and concludes that the proposed development at the Appeal Site is not inappropriate development.

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## **A1. GREEN BELT IMPACT ASSESSMENT METHODOLOGY**

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## M1. GREEN BELT IMPACT ASSESSMENT METHODOLOGY

### Policy Context

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#### 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

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- 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

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- 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**

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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

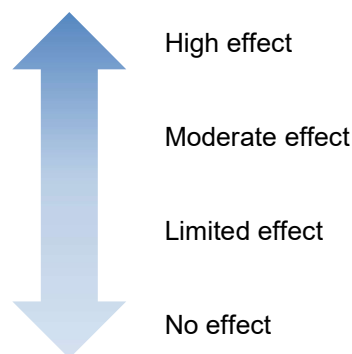
the instance where development is considered to fall within one of the potential exceptions to inappropriate development.

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**

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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.

| <b>Table 1.1 Contribution to Purpose a</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Strong</b>                              | <p>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:</p> <ul style="list-style-type: none"> <li>• Be adjacent or near to a large built up area; and</li> <li>• If developed, result in an incongruous pattern of development (such as an extended “finger” of development).</li> </ul> <p>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.</p>                                                                                                                                                                                                                                                                                                               |
| <b>Moderate</b>                            | <p>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):</p> <ul style="list-style-type: none"> <li>• Having physical feature(s) in reasonable proximity that could restrict and contain development;</li> <li>• Be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development;</li> <li>• Contain existing development; and/or</li> <li>• Being subject to other urbanising influences.</li> </ul> <p>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.</p>                                                                                                                                                                          |
| <b>Weak or None</b>                        | <p>Land which makes a weak or no contribution to purpose a is likely to:</p> <ul style="list-style-type: none"> <li>• Not be adjacent to or near to a large built-up area; or</li> <li>• Be adjacent to or near to a large built-up area, but is containing or largely enclosed by significant existing development.</li> </ul> <p>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.</p> <p>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.</p> |

| Table 1.2 Harm to Purpose a |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>High</b>                 | 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.                                                                                                                                                                                                                                               |
| <b>Moderate</b>             | 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.                                                                                                                                                                                                                       |
| <b>Limited or None</b>      | <p>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.</p> <p>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.</p> |

**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.

| <b>Table 2.1 Contribution to Purpose b</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Strong</b>                              | <p>Land which makes a strong contribution to purpose b is likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> <li>• Form a substantial part of a gap between towns; and</li> <li>• The development of which would result in the loss of visual separation of towns.</li> </ul> <p>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.</p>                                                                                                                                                                                                                                                                                         |
| <b>Moderate</b>                            | <p>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):</p> <ul style="list-style-type: none"> <li>• Forming a small part of the gap between towns; and/or</li> <li>• 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.</li> </ul> <p>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.</p>                                                        |
| <b>Weak or None</b>                        | <p>Land which makes a weak or no contribution to purpose b is likely to:</p> <ul style="list-style-type: none"> <li>• Not form part of a gap between towns; or</li> <li>• Does form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation.</li> </ul> <p>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.</p> <p>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.</p> |

| <b>Table 2.2 Harm to Purpose b</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>High</b>                        | 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.                                                                                                                                                                                                                                            |
| <b>Moderate</b>                    | 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.                                                                                                                                          |
| <b>Limited or None</b>             | 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.<br><br>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.

| <b>Table 3.1 Contribution to Purpose c</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Strong</b>                              | 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.                                                                                                                                                                                                                                                                         |
| <b>Moderate</b>                            | 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.                                                                                                                                                                                                                                |
| <b>Weak or None</b>                        | 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.<br><br>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 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>High</b>                 | 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.                                                                                                                                                                  |
| <b>Moderate</b>             | 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.                                                                                                                                                                        |
| <b>Limited or None</b>      | 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.<br><br>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.

| <b>Table 4.1 Contribution to Purpose d</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Strong</b>                              | <p>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:</p> <ul style="list-style-type: none"> <li>• Form part of the setting of a historic town; and</li> <li>• 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.</li> </ul> <p>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.</p>                                                                                                                                                                                                |
| <b>Moderate</b>                            | <p>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):</p> <ul style="list-style-type: none"> <li>• Being separated to some extent from historic aspects of the town by existing development or topography;</li> <li>• Containing existing development; and/or</li> <li>• Not having an important visual, physical, or experiential relationship to historic aspects of the town.</li> </ul> <p>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.</p>                                                  |
| <b>Weak or None</b>                        | <p>Land which makes a weak or no contribution to purpose d is likely to:</p> <ul style="list-style-type: none"> <li>• Not form part of the setting of a historic town; or</li> <li>• Have no visual, physical, or experiential connection to the historic aspects of the town.</li> </ul> <p>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.</p> <p>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.</p> |

| Table 4.2 Harm to Purpose d |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>High</b>                 | 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.                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Moderate</b>             | 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.                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Limited or None</b>      | <p>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.</p> <p>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.</p> |

**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.

| <b>Table 5.1 Harm to Purpose e</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>High</b>                        | 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.                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Moderate</b>                    | 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.                                                                                                                                                                                                                                                                                                                                     |
| <b>Limited or None</b>             | <p>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.</p> <p>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.</p> |

## 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.