

Matter 3 – The Green Belt

Issue 1 – Green Belt Review

7. Following the Stage 1 hearings, the Council published and consulted on new evidence relating to the alteration of Green Belt boundaries. In particular, this considered how previously developed land was considered in the site selection process.

Q1 With reference to paragraph 146a of the Framework, has the Council adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land?

- 1.1 Yes, with reference to paragraph 146a of the Framework, it is considered that the Council has adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land, when applying its Site Selection Methodology (SSM).

- 1.2 NPPF paragraph 146a relates to exceptional circumstances to justify changes to Green Belt boundaries, and reads as follows:

146. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

a) makes as much use as possible of suitable brownfield sites and underutilised land;

...

- 1.3 The Council's Approach to Green Belt PDL is set out in the 'Local Plan Evidence – Site Selection Methodology, Outcomes and Site Allocations' Paper (LPSS.01.01) as follows:

3.3. The Local Plan seeks to make the most effective and efficient use of land in the District and has undertaken an extensive and rigorous search for Previously Developed Land (PDL) (also known as 'Brownfield land' in national policy) within existing built-up areas. The approach has been underlain by the concept of 'leaving no stone unturned' in the search for appropriate sites on brownfield land. This extensive search has also included potential PDL opportunities in the Green Belt. However, an insufficient supply of Previously Developed Land led to the requirement to identify sites on Green Belt Land.

- 1.4 The Council's Stage 1 MIQ response under 'Matter 2 - Issue 5 Site Selection Methodology' summarises the overall site selection process, including in relation to Green Belt PDL sites as follows:

6.5 The Site Selection process overall effectively took, in simple terms:

- all potentially sustainable development proposals that were available in the urban area
- then all potential sustainable development proposals on Green Belt Previously Development Land
- then all potential sustainable development proposals recommended for further consideration in the Green Belt Review (unless a specific reason ruled them out)
- then, in order to achieve enough development capacity to meet the Standard Method for housing need figure in full, sites considered in the Green Belt Review (which were inherently in more sustainable locations than those not included in the Green Belt Review and would not cause 'holes' in the Green Belt) which offered significant Economic, Environmental and Social benefits.

1.5 As the Green Belt Previously Developed Land (PDL) – Additional Clarification Paper (SADC – ED78) sets out:

3.1 Part B of the draft Local Plan includes 3no. 'Green Belt - Previously Developed Land' site allocations, contributing a total of 137 homes. The primary reason that these sites were allocated was that they were on those Green Belt HELAA sites which contained built development that was considered likely to meet the NPPF Annex 2 definition of 'Previously Developed Land'¹ ; sufficient to yield 5 or more homes (net) if applying the NPPF 2023 paragraph 154 g) PDL exception to inappropriate development in the Green Belt:

154. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

...

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

- not have a greater impact on the openness of the Green Belt than the existing development; or
- not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.

3.2 Secondly, there were no significant impediments to developing the site in terms of constraints or sustainability identified.

3.3 In the context of sites put forward through the HELAA process, consideration of the NPPF paragraph 154 g) PDL exception to inappropriate development in the Green Belt represented a reasonable approach, in the Council's view. This approach reflects the high priority given to utilising PDL when considering releasing Green Belt land for development and takes account of the quantum of development that would be likely to be approved in a planning application on the basis of meeting the NPPF PDL exception.

3.4 The 3 HELAA sites which were considered suitable (see above) and which were considered likely to yield 5 or more homes (net) if applying the above NPPF PDL exception are set out in Part B of the Plan...

- 1.6 The approach that Green Belt PDL allocation sites should *'not have a greater impact on the openness of the Green Belt than the existing development'* mirrors the NPPF exception and is considered an appropriate strategy for sites which contain PDL, in the context of the Council's overall Site Selection Methodology. It is acknowledged that not all land which may fall within the definition of 'Previously developed land' would be taken equally into account by this approach, for example surface level hardstanding or land which may be argued to be within the curtilage of a building. However, this approach mirrors the above NPPF test used with regards to the suitability of development on PDL in the Green Belt when considering planning applications. The Council's use of this same test to consider which PDL is suitable for development in a site allocation is an appropriate strategy and is considered to be consistent with national policy.
- 1.7 The approach of mirroring the approach taken in the first 'limb' of the NPPF para 154 g) test as to where development at PDL may be considered suitable (*"...not have a greater impact on the openness of the Green Belt than the existing development"*) but not the second 'limb' (*"not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."*) is due to the second limb being more dependent on the specifics of a particular development proposal.
- 1.8 Based on the available evidence it was possible to form a judgment as to whether a site allocation is likely to *'have a greater impact on the openness of the Green Belt than the existing development'* (first 'limb'); but it was not possible to form a judgment as to whether it would *'cause substantial harm to the openness of the Green Belt... and contribute to meeting an identified affordable housing need within the area of the local planning authority'* (second 'limb'), due to this being dependent on the specifics of a particular development proposal.
- 1.9 Taking the same approach as that taken in paragraph 154 g) first 'limb' is therefore considered to represent an appropriate strategy in the context of the Council's Site Selection Methodology, taking into account the reasonable alternatives, based on proportionate evidence.
- 1.10 It can be noted that if any particular planning application proposal meets either limb of NPPF paragraph 154 g) (or another exception to inappropriate development), that this is likely to weigh significantly in favour of the assessment of a planning application; but that is separate to the Council's strategy for site selection.
- 1.11 The approach that only sites that would deliver 5+ would be subject of an allocation is consistent across the Council's SSM, and is common practice for Local Plan allocations, which as the NPPF sets out need to have a proportionate evidence

base. It is of course open to applicants to bring forward planning applications for smaller scale development, or on the basis of the second 'limb' to paragraph 154 g) as set out above.

- 1.12 Therefore, taking the above into account, with reference to paragraph 146a of the Framework, it is considered that the Council has adequately demonstrated that the strategy makes as much use as possible of suitable brownfield sites and underutilised land, when applying its Site Selection Methodology.

Q2 Does the additional evidence adequately demonstrate that the Plan is consistent with paragraph 147 of the Framework, which states that plans should give first consideration to land which has been previously-developed and/or is well-served by public transport?

- 2.1 Yes, it is considered that the additional evidence, in the context of the totality of the evidence, does adequately demonstrate that the Plan is consistent with paragraph 147 of the Framework, which states that plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.

- 2.2 Paragraph 147 of the Framework reads as follows, referred-to sentence underlined:

147. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.

- 2.3 In relation to giving 'first consideration' to land which has been previously-developed, the Council's Stage 1 MIQ response under 'Matter 2 - Issue 5 Site Selection Methodology' summarises the overall site selection process, including in relation to Green Belt PDL sites, as follows:

6.6 *The Site Selection process overall effectively took, in simple terms:*

- all potentially sustainable development proposals that were available in the urban area*
- then all potential sustainable development proposals on Green Belt Previously Development Land*
- then all potential sustainable development proposals recommended for further consideration in the Green Belt Review (unless a specific reason ruled them out)*

- *then, in order to achieve enough development capacity to meet the Standard Method for housing need figure in full, sites considered in the Green Belt Review (which were inherently in more sustainable locations than those not included in the Green Belt Review and would not cause 'holes' in the Green Belt) which offered significant Economic, Environmental and Social benefits.*

- 2.4 This process as summarised above identifies that *'all potential sustainable development proposals on Green Belt Previously Development Land'* would be those sites outside the urban area which would be considered first, which is consistent with paragraph 147.
- 2.5 Where NPPF paragraph 147 states that *'...plans should give first consideration to land which has been previously-developed and/or is well-served by public transport'*, the *'well-served by public transport'* element is not directly addressed in the Council's recent additional evidence, but is covered in the next part of the Site Selection process listed above, ie:
- *then all potential sustainable development proposals recommended for further consideration in the Green Belt Review (unless a specific reason ruled them out)*
- 2.6 The Stage 2 Green Belt Review 2023 (Stage 2 GBR) (GB 02.02) applied settlement buffers around each settlement inset from the green belt for its 'area of search', in order to encourage a sustainable pattern of development. The larger settlement buffers around the higher-tier settlements resulted in part from the fact that they offer greater accessibility by public transport. The degree to which a site is well-served by public transport is a part of the justification for taking such a 'settlement buffers' approach to identifying potential sites for 'sustainable development'. This is reflected in the Stage 2 GBR summary of the NPPF policy context for 'Sustainable Development' at A.1.1.4 as below:

The NPPF aims to promote patterns of development which make the fullest possible use of public transport, walking and cycling and which minimise the need to travel. The NPPF paragraph 142 states that:

"Paragraph 142. When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport."

N.B. the NPPF 2021 paragraph 142 quoted above is the equivalent of NPPF 2023 paragraph 147.

2.7 As set out in Section 4.2.1 of the Stage 2 GBR:

4.2.1 Area of Search - Settlement Buffers

The Stage 1 GBR assessed the entirety of the Green Belt in St Albans against the NPPF purposes. In contrast, the GBR Stage 2 feeds directly into SACDC's site selection process. It was therefore appropriate to undertake a more spatially focussed piece of work. The initial area of search was defined by applying a buffer around each settlement inset from the green belt, which would assist in encouraging sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt (see Appendix A3.2 for examples of experience elsewhere under this approach). This approach ensured a proportionate and focussed study.

Sites that were not adjacent to existing urban areas (or the buffers) were thus excluded for the assessment on the basis that their release would (a) not contribute to a sustainable pattern of development; and (b) undermine the integrity of the Green Belt by creating hole(s) within its fabric...

2.8 The approach of using settlement buffers is justified further in the Stage 1 Matter 2 Issue 5 response as follows:

2.3 *The technique of using buffers is part of a justified and effective approach to site selection in that it would:*

assist in encouraging sustainable pattern of development accessible to existing settlements and maintain the integrity of the Green Belt. ... This approach ensured a proportionate and focussed study.

2.4 *This is explained further, setting out the exact reasons justifying the reasons for excluding sites beyond the buffers:*

Sites that were not adjacent to existing urban areas (or the buffers) were thus excluded for the assessment on the basis that their release would (a) not contribute to a sustainable pattern of development; and (b) undermine the integrity of the Green Belt by creating hole(s) within its fabric.

2.5 *The approach of using buffers in carrying out a Green Belt Review has been used for other local authorities, as stated in the Stage 2 GBR Section 1.3 Study Context: The methodology has also been informed by experience elsewhere including authorities where Local Plans (and underpinning evidence) have been found sound, such as Runnymede where the Green Belt evidence was commended by the Inspector*

2.6 *The Stage 2 GBR Appendix A3 sets out some of the experience of other Green Belt Reviews, including the use of buffers, for other local authorities such as Runnymede Borough Council and Spelthorne Borough Council, where the*

approach has been accepted (and indeed commended) as part of the evidence for now adopted Plans.

Proformas were then used to analyse each site against a “sustainable development potential”, taking into account the Green Belt Study and major policy and environmental constraints. Accessibility was determined by measuring distances to key infrastructure and services.

2.9 The Site Selection Proformas provide an assessment of distances to key infrastructure and services such as public transport, schools, employment, local facilities and GP surgeries. The analysis was undertaken to understand and assess a site's strengths, weaknesses and attributes that needed to be addressed through criteria set out in Local Plan policies and allocations. It should be noted that this was not undertaken as a scoring exercise. This is set out in the Site Selection Proforma Methodology (LPSS 02.02).

2.10 LPSS 02.02 Table 2 – ‘Site assessment – Major Policy and Environmental Constraints’ sets out that the following matters were assessed in the site assessment proformas in relation to the ‘Major Policy and Environmental Constraint’ of ‘Accessibility’, with 3 assessment criteria under the Category ‘Accessibility by Public Transport’:

ACCESSIBILITY					
Category	Criteria	Land Use	WEAK	MEDIUM	STRONG
Accessibility by Public Transport	Distance to nearest bus stop (with at least peak hourly day service)	Housing and Employment	Site is more than a 1,000m from a bus stop	Site is between 401m and 1,000m from a bus stop	Site is within 400m from a bus stop
	Distance to the nearest mainline rail station (The Midland Main Line or West Coast Main Line)	Housing and employment	Site is more than 4000m from the nearest mainline rail station	Site is between 1001m and 4000m from the nearest mainline rail station	Site is within 1000m from the nearest mainline rail station
	Distance to the Abbey Line (branch line)	Housing and Employment	Site is more than 4000m from the nearest branch line station	Site is between 1001m and 4000m from the nearest branch line station	Site is within 1000m from the nearest branch line station

2.11 The Councils' answer to Stage 1 Matter 2 Issue 5 'Site Selection Methodology' Q3 sets out:

3.2 *Transport Impact Assessments (TIA) (INF 09.01) were used to assess all sites considered for allocation. The TIAs were prepared collaboratively with Hertfordshire County Council. The TIAs approach to accessing services and facilities using active and sustainable modes of transport was not only distance based, but carefully considered factors such as the walking times and conditions for pedestrians, cycling and public transport. The response to Initial Questions, Question 9 - The Green Belt and Exceptional Circumstances – Evidence Paper (SADC/ED32), stated in paragraph 9.20:*

For Green Belt sites the Proforma assessment included distances to the nearest public transport, i.e. bus stop and railway station. In their role as the

Local Highways Authority, Hertfordshire County Council (HCC) requested that a Transport Impact Assessment be prepared for each proposed site allocation (INF 09.01 - Transport Impact Assessment (TIA) Intro (2024) and INF 09.02 to INF 09.09). The TIA informed the Proforma assessments and the draft Local Plan by considering the impacts of development of sites in transport terms, and what mitigation (if any) is required. This considered whether sustainable transport modes can be taken up, given the type of development and its location; whether safe and suitable access to the site can be achieved for all users; and whether any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. The Cross Lane, Harpenden site M1a from the Local Plan Regulation 18 draft was not progressed due to it not being demonstrated that safe and suitable access for all transport modes had a reasonable prospect of being provided within the Plan period. The TIAs for all other Green Belt sites showed that they related sufficiently well to public transport and that safe and suitable access for all transport modes had a reasonable prospect of being provided within the Plan period, to be allocated in the draft Regulation 19 Plan.

2.12 Examples of how public transport has been taken into account in the site-specific TIAs (available at INF 09.02 – 09.09) include the following (public transport-related points highlighted):

- Site B4 – East St Albans (within INF 09.06):

1. Distance to Key Services & Facilities (Approximate)

- 1.1 km to a primary school (St John Fisher Catholic Primary School)
- 1.7 km to a secondary school (Sandringham School)
- 480 m to a bus stop (peak hourly day service) (Ardens Way, Stop ID: hrtatmwt)
- 3.3 km to St Albans City mainline railway station
- 1.1 km to The Quadrant, Marshalswick district centre

- Site M7 – Townsend Lane, Harpenden (within INF 09.03):

1. Distance to Key Services & Facilities (Approximate)

- 860 m to a primary school (Roundwood Primary School)
- 825 m to a secondary school (Roundwood Park School)
- 1.1 km to a bus stop (peak hourly day service) (Clarence Road; Stop ID: hrtdamjp) or 725m to nearest bus stop (less frequent) (Roundwood Park School; Stop ID: hrtatdwm)
- 1.9 km to Harpenden mainline railway station
- 1.2 km to a local centre/town centre (Harpenden Town Centre) or 1.1 km to the nearest convenience store (M&S Simply Food, 14 Luton Road)

- 2.13 Having assessed the relevant distances as above, typical further public transport-related assessment in the TIAs is to set out within sections 2 '*Key Site Transport and Access Related Requirements*' and 6 '*Other Transport and Access Contributions (Indicative)*' the relevant Part B requirements, and to include a recommendation for: "*Public transport contributions as required by HCC.*"
- 2.14 Taking the above into account, it is considered that the additional evidence, in the context of the totality of the evidence, does adequately demonstrate that the Plan is consistent with paragraph 147 of the Framework, which states that plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.

Q3 Does the evidence demonstrate that, at a strategic level, exceptional circumstances exist to alter Green Belt boundaries?

- 3.1 Yes, it is considered that the evidence does demonstrate that, at a strategic level, exceptional circumstances exist to alter Green Belt boundaries.
- 3.2 As set out in the Draft Local Plan (LPCD 02.01) at paragraph 3.19.

National policy sets out that before concluding that 'exceptional circumstances' exist to justify changes to Green Belt boundaries, the Council should demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This means that the Council's strategy must (and the Council has):

- a) Make as much use as possible of suitable PDL sites and underutilised land;*
- b) Optimise the density of development in line with national policy, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.*

- 3.3 In answer to Stage 1 MIQs and as addressed in the Green Belt and Exceptional Circumstances – Evidence Paper (GB 01.01), St Albans City and District Council considers that the general case has been made for exceptional circumstances
- 3.4 The Green Belt and Exceptional Circumstances - Evidence Paper (GB 01.01) states in paragraphs 7.1 and 7.2 that:

7.1 The proper interpretation of the relevant national policy and the legal context in which it sits is familiar to the Council, including: the Compton (2019); Calverton (2015); Gallagher Estates (2014); and St Albans (2013 and 2014) cases

7.2 The local context in which conclusions have been reached regarding the 'Exceptional Circumstances' necessary to require release of Green Belt land involves a variety of factors, including:

- The acuteness/intensity of the housing need.
- The inherent constraints on supply/availability of non-Green Belt land.
- The difficulties of delivering sustainable development without impinging on the Green Belt.
- The nature and extent of the harm to the Green Belt that would arise if the boundaries were to be altered as proposed.
- The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.

3.5 The evidence paper goes on to say in paragraph 7.3 that:

The Council has concluded that 'Exceptional Circumstances' do exist and it is necessary to amend Green Belt boundaries as set out in the draft Local Plan and its Policies Map. This includes amendments to facilitate both primarily residential and 2 primarily employment land. Further there are existing areas of significant built development created since the last Local Plan was adopted in 1994, identified in the Green Belt Review stage 2, where the Council has concluded that the necessary 'Exceptional Circumstances' exist to amend the green belt boundaries

3.6 The application of some Green Belt policies (such as Policy LG8) rely on the Council's proposed boundaries to Green Belt settlements as shown on the policies map.

Q4 What is the justification for defining boundaries for those settlements that remain washed over by the Green Belt? Are the boundaries justified and effective?

What is the justification for defining boundaries for those settlements that remain washed over by the Green Belt?

4.1 The justification is set out in the Green Belt Review Report (2023) (GB 02.02), section 2.2:

There is no Government defined methodology for carrying out a review of washed over villages in the Green Belt or detailed criteria for determining which villages should be inset.

- *The fundamental policy principles of Green Belt should form the basis of assessing washed over villages ...*

There is no definition of what constitutes a village in the NPPF. However, a review of Case Law has assisted in defining a "village" as a group of houses and associated

building, smaller than a town, situated in a rural area. A common-sense approach should be used when identifying the extent of a village. It should be physically and perceptually defined¹⁷.

- Openness in washed over villages should be considered not only in terms of a 'volumetric approach' (i.e. physical coverage of built form) but also in terms of 'visual elements' (for example, visual linkages between settlements or functional character and linkages to the wider Green Belt)¹⁸.*
- Washed over village studies elsewhere have focussed assessments on the degree of openness within each village and its contribution to the openness of the wider Green Belt. There is a commonality that openness is assessed by an analysis of character and urban form, developed land, visual intervisibility, and continuity with surrounding open land.*

- 4.2 Whilst GBR concluded that the relevant settlements should remain washed over by the Green Belt, SADC considered further whether or not the boundaries from the 1994 Local Plan should be retained or altered.

Are the boundaries justified and effective?

- 4.3 Yes, the boundaries are considered to be justified and effective.

- 4.4 The GBR Section 4.8 describes defining village boundaries:

The stage was guided by national policy, case law, and experiences in other authorities to define the most appropriate and robust study area. The local context was also taken into account, specifically the SACDC Settlement Hierarchy and where applicable, Conservation Area extents.

The Council's GIS shapefiles (for the settlements and Conservation Areas) were initially used to determine the spatial extent of the washed over villages. These existing boundaries were then reviewed against other mapping resources (Google Earth, Bing Maps, aerial imagery and street view photography), to ensure they logically follow the built curtilage of the village.

- 4.5 Section 4.10 sets out the washed over village assessment:

The assessment process involved a mixture of evidence from desk-based research as well as primary evidence obtained through site visits. Relevant background documents were reviewed to set the scene for the assessments and a series of spatially reference GIS base layers were interrogated for the assessment.

- 4.6 The section goes on to describe the open character assessment:

If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt.

For this, the land area has been assessed on whether (a) the village has an open character and (b) whether the open character of the village makes an important contribution to the openness of the Green Belt. Only villages judged to have an open character were taken forward to assess the contribution to openness

- 4.7 The section goes on to describe the Contribution to Openness of the Green Belt Assessment:

openness has both a spatial and visual dimension. Spatial openness relates to the density and configuration of built form and visual openness relates to the perception of openness, for example, the impact that topography, long views and vegetation have on the openness of Green Belt. This component of the assessment is therefore focused on the relationship between the village and the wider Green Belt, including views into and out of the village and the visual permeability of the settlement boundaries.

- 4.8 Section 4.11 of the GBR describes the categorisation and recommendations:

Following the assessment of the villages against the NPPF, each village was categorised as shown in Table 4.16. In determining whether a village should be included (washed over) or excluded (inset) from the Green Belt, both assessment components were taken into account. However, the open character assessment was used as an initial filter. If it was concluded that the village did not have an open character, it was concluded that the village did meet the NPPF requirements, since it specifically refers to the contribution that the open character makes to openness. Thus, if a village does not have an open character, consequently it cannot make an important contribution.

- 4.9 The GBR section 6.2 washed over villages key findings sets out that:

The following settlements were assessed as having both an open character and having an important impact on the openness of the Green Belt and therefore should be retained as washed over: Colney Heath, Folly Fields, Gustard Wood, Lea Valley Estate, Sandridge, Sleafshyde and Smallford. While the settlement at Napsbury was found to have an open character and contribute to the openness of the Green Belt and therefore recommended for further consideration as a washed over village.

and

The findings of the Washed Over Villages Study, concluded that; each of the settlements had an open character and all of the settlements' open character was determined to make an important contribution to the openness of the Green Belt with the exception of Radlett Road and Frogmore which was deemed not to contribute to the openness of the Green Belt. Therefore, the settlement was considered in relation to the wider Stage 2 Green Belt Review as whether it should be inset from the Green Belt. It was concluded that the Radlett Road and Frogmore should also be retained

in the Green Belt. The study also recommended that Napsbury is considered further as a washed over village.

- 4.10 It is also considered important to bear in mind that, as set out in Reg 19 Local Plan Part A (2024) (LPCD 02.01) the policies LG7 – Affordable housing in the Green Belt (rural exception sites) and LG8 – Small Scale Development in Green Belt Settlements allow for the ongoing evolution of GB villages:

LG7 – Affordable housing in the Green Belt (rural exception sites)

Proposals for affordable-only housing in the Green Belt for local needs must demonstrate that:

e) There is a close relationship between the proposed site and existing built up areas, either in settlements excluded from the Green Belt or included in Green Belt Settlement boundaries.

and

LG8 – Small Scale Development in Green Belt Settlements

Proposals for small scale development or redevelopment for a residential use, related community facilities and services, or small businesses, within Green Belt Settlement boundaries, must demonstrate that: ...