

Matter 3 – The Green Belt

Issue 2 – Green Belt Review

- 26 The approach in the Plan has been informed by the Stage 2 Green Belt Review 2023 (GB 02.02). That followed an earlier Green Belt Review Sites and Boundaries Study in 2013 and 2014 (GB 04.03 and GB 04.04). In response to the Inspectors' Initial Questions, the Council provided a consolidated list of all Green Belt changes proposed in the submitted Plan.

Q1 How does the methodology in the 2023 Stage 2 Green Belt Review differ from the earlier studies in 2013 and 2014 referenced above?

- 1.1 A comparison of the methodologies of the 2013 Green Belt Review Purposes Assessment (GB 03.01), the 2014 Green Belt Review Sites and Boundaries Study (GB 04.02) and the Stage 2 Green Belt Review (2023) (GB 02.02) is set out in the table below¹.
- 1.2 Overall, the Stage 2 Green Belt Review (2023) (GB 02.02) was much more 'granular' and considered all scales of sites from 5 homes to 2,500 and looked at more sites as a result (182 compared to 8). This addresses the Inspector's concerns at the examination of the previous draft Local Plan in 2019 (Inspectors Letter 2020 SADC Response (2024) (LPCD 07.01).

Methodology element	2013 Green Belt Review Purposes Assessment (GB 03.01)	2014 Green Belt Review Sites and Boundaries Study (GB 04.02)	Stage 2 Green Belt Review (2023) (GB 02.02)
Geography	<ul style="list-style-type: none">• St Albans City and District;• Borough of Dacorum;• Borough of Welwyn Hatfield	St Albans City and District only	St Albans City and District only
Site identification	66 strategic parcels across the three districts. Parcel boundaries aligned to natural or physical features where	Considered 8 strategic parcels of land that contribute least towards Green Belt purposes as assessed in the	182 sub-areas identified using the following process: 1. Defined an area of search through

¹ The 2013 Green Belt Review Sites and Boundary Study December 2013 (GB 04.03) was superseded by the 2014 study (GB 04.02). Document GB 04.04 contains only maps associated with the document GB 04.02. This answer considers the methodologies of the 2013 Green Belt Review Purposes Assessment (GB 03.01), and the 2014 Green Belt Review Sites and Boundaries Study (GB 04.02).

Methodology element	2013 Green Belt Review Purposes Assessment (GB 03.01)	2014 Green Belt Review Sites and Boundaries Study (GB 04.02)	Stage 2 Green Belt Review (2023) (GB 02.02)
	possible e.g. water courses, prominent hedgerows, roads, railway lines.	2013 Green Belt Review Purposes Assessment (GB 03.01)	<p>the application of settlement buffers².</p> <p>2. All 8 strategic sub-areas considered in the 2014 Green Belt Review Sites and Boundaries Study (GB 04.02) were included, including those beyond the settlement buffers.</p> <p>3. Those small-scale sub-areas, that contribute least towards Green Belt purposes as assessed in the 2013 Green Belt Review Purposes Assessment (GB 03.01), and that fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site entirely or partially within the settlement buffer were included.</p> <p>4. All sites promoted in the 'call for sites' over the period 2016 to 2021, which are</p>

² 400m buffers were applied around St Albans, Harpenden, Hemel Hempstead, Watford, Radlett and Hatfield. 250m buffers were applied around Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street/Frogmore, Redbourn, Wheathampstead, Shenley, Blackmore End, and Abbots Langley (Source: Table 4.1).

Methodology element	2013 Green Belt Review Purposes Assessment (GB 03.01)	2014 Green Belt Review Sites and Boundaries Study (GB 04.02)	Stage 2 Green Belt Review (2023) (GB 02.02)
			<p>located in the Green Belt were considered with those sites that fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site entirely or partially within the settlement buffer included.</p> <p>5. Site areas refined to remove land subject to major policy constraints.</p> <p>Site boundaries were defined using permanent and readily recognisable boundary features (both man-made and natural)³ to define boundaries.</p>
Constraints considered	No constraints considered	Constraints considered as part of overall assessment and not used to remove sites.	<p>Sites with the following major constraints were not considered:</p> <ul style="list-style-type: none"> Flood zone 3b (functional floodplain)

³ Motorways; A and B Roads; Railway lines; Canals; Rivers and waterbodies; Natural 'buffer' features such as ridgelines; Unclassified public and private roads; Smaller water features, including streams and other watercourses; Prominent physical/topographical features, e.g. embankments; Existing development with strongly established, regular or consistent boundaries; Well-established woodland edges, tree belts and hedgerows (Source: Table 4.2)

Methodology element	2013 Green Belt Review Purposes Assessment (GB 03.01)	2014 Green Belt Review Sites and Boundaries Study (GB 04.02)	Stage 2 Green Belt Review (2023) (GB 02.02)
			<ul style="list-style-type: none"> • Sites of Special Scientific Interest (SSSI) • Scheduled Monuments • Registered Parks and Gardens • Ancient Woodland
Assessment criteria	<p>Strategic parcels considered against the following criteria:</p> <ol style="list-style-type: none"> 1. Does it check the unrestricted sprawl of large built-up areas⁴? 2. Does it prevent neighbouring towns⁵ from merging? 3. Does it assist in safeguarding the countryside from encroachment? 4. Does it preserve the setting and 	<p>Sites were considered as follows:</p> <ul style="list-style-type: none"> • Task 1a: Review of Contribution towards Green Belt Purposes and review of relevant Planning History • Task 1b: Assessment of Constraints; Integration and Landscape Appraisal and Sensitivity • Task 2a: Boundary Review and contribution to 	<p>Sites against the following criteria:</p> <ol style="list-style-type: none"> 1. Does it check the unrestricted sprawl of large built-up areas⁷? 2. Does it prevent neighbouring towns⁸ from merging? 3. Does it assist in safeguarding the countryside from encroachment? 4. Does it preserve the setting and special character of historic towns?

⁴ Defined for purposes of study as London, Luton & Dunstable, and Stevenage on the grounds that the Green Belt area in the study is comprised of an amalgamation of London's Metropolitan Green Belt, a Green Belt created around Luton & Dunstable, and a Green Belt created around Stevenage (Source: Table 5.1).

⁵ The towns considered were Hemel Hempstead, St Albans, Harpenden, Welwyn Garden City, Berkhamstead, Tring, and Hatfield (Source: Table 5.1).

⁷ Defined for purposes of study as St Albans, Harpenden, Luton and Dunstable, Hemel Hempstead, Watford, Hatfield, and Welwyn Garden City (Source: Table 4.4).

⁸ The towns considered were St Albans, Harpenden, Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street / Frogmore, Redbourn, Wheathampstead, Luton and Dunstable, Slip End, Hemel Hempstead, Kings Langley, Markyate, Abbots Langley, Watford, Radlett, Hatfield, Welwyn Garden City, and Welham Green (Source: Table 4.7).

Methodology element	2013 Green Belt Review Purposes Assessment (GB 03.01)	2014 Green Belt Review Sites and Boundaries Study (GB 04.02)	Stage 2 Green Belt Review (2023) (GB 02.02)
	<p>special character of historic towns?</p> <p>5. Does it broadly maintain the existing settlement pattern⁶?</p>	<p>Green Belt purposes</p> <ul style="list-style-type: none"> • Task 2b: Assessment of Developable Areas • Task 2c: Indicative Development Capacity • Task 3: Evaluation of site suitability for potential Green Belt release and future development 	

⁶ Settlements considered included all towns under assessment criteria 2, plus the settlements of Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street / Frogmore, Redbourn, Wheathampstead, Annables Kinsbourne Green, Colney Heath, Folly Fields, Gustard Wood, Lea Valley Estate, Radlett Road, Frogmore, Sandridge, Sleafshyde, Smallford, Markyate, Welham Green, Welwyn, Ayot Green, Ayot St Lawrence, Ayot St Peter, and Bullens Green.

Q2 How were the areas selected for assessment in the Stage 2 Green Belt Review and what are they based on? How do the areas differ from previous assessments of the Green Belt?

How were the areas selected for assessment in the Stage 2 Green Belt Review and what are they based on?

- 2.1 Sections 4.2 and 4.3 of the Stage 2 Green Belt Review (2023) (GB 02.02) set out the area identification process in full.
- 2.2 In summary, 182 areas were selected for assessment in the Stage 2 Green Belt Review as follows:
 1. An area of search was defined through the application of settlement buffers⁹.
 2. All 8 strategic sub-areas considered in the 2014 Green Belt Review Sites and Boundaries Study (GB 04.02) were included, including those beyond the settlement buffers.
 3. Those small-scale sub-areas, that contribute least towards Green Belt purposes as assessed in the 2013 Green Belt Review Purposes Assessment (GB 03.01), and that fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site entirely or partially within the settlement buffer were included.
 4. All sites promoted in the 'call for sites' over the period 2016 to 2021, which are located in the Green Belt were considered with those sites that fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site entirely or partially within the settlement buffer included.
 5. Site areas refined to remove land subject to major policy constraints¹⁰.

How do the areas differ from previous assessments of the Green Belt?

- 2.3 The 2013 Green Belt Review Purposes Assessment (GB 03.01) assessed 66 strategic parcels across three districts.
- 2.4 2014 Green Belt Review Sites and Boundaries Study (GB 04.02) assessed 8 strategic parcels of land that contribute least towards Green Belt purposes as assessed in the 2013 Green Belt Review Purposes Assessment (GB 03.01). As above, the 2023 study considered 182 sub-areas of differing scales (from 5 homes upwards).

⁹ 400m buffers were applied around St Albans, Harpenden, Hemel Hempstead, Watford, Radlett and Hatfield. 250m buffers were applied around Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street/ Frogmore, Redbourn, Wheathampstead, Shenley, Blackmore End, and Abbots Langley (Source: Table 4.1).

¹⁰ Flood zone 3b (functional floodplain), Sites of Special Scientific Interest (SSSI), Scheduled Monuments, Registered Parks and Gardens, and Ancient Woodland

Q3 Is the methodology by which sites have been assessed in the Stage 2 Green Belt Review sufficiently robust and transparent to support the proposed boundary revisions? If not, what approach should have been used and why?

- 3.1 Yes, the methodology by which sites have been assessed in the Stage 2 Green Belt Review is sufficiently robust and transparent to support the proposed boundary changes.
- 3.2 Section 4.5 of the Stage 2 Green Belt Review (2023) (GB 02.02) sets out the assessment of the sites and clearly sets out how scores are arrived at for each assessment criteria. It considers the contribution of each site towards the NPPF defined purposes of Green Belt (excluding that to assist in urban regeneration, by encouraging the recycling of derelict and other urban land; which all Green Belt in the district does irrespective of its location and contribution to the wider Green Belt).

Table 4.3 Criterion Scores

Overall strength of Green Belt sub-area against criterion	Score	Equivalent Wording
	0	Does not meet criterion
	1	Meets criterion weakly or very weakly
	2	Meets criterion relatively weakly
	3	Meets criterion
	4	Meets criterion relatively strongly
	5	Meets criterion strongly or very strongly

Figure 4.8 Illustration of Connected, Contiguous and Enclosed

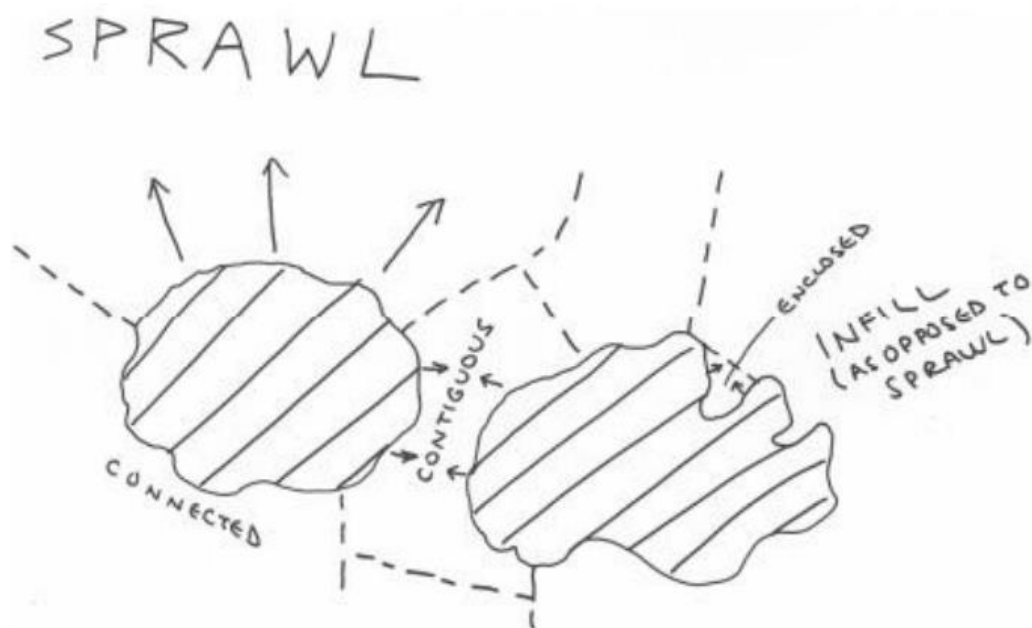


Table 4.5 Examples of Irregular and Regular Boundary Features

Boundary Classification	Boundary Type	Example Features
Regular	Infrastructure	Motorways A and B roads Railway lines Canals
	Landform	Rivers and waterbodies Natural 'buffer' features such as ridgelines Prominent physical/ topographical features (e.g. reservoir embankment) Mature and unbroken woodland edges, tree belts and hedgerows Existing development with strong established and regular or consistent boundaries
Irregular	Infrastructure	Unclassified public roads Private or un-made road Bridleway or footpath
	Landform	Smaller water features, including streams, canals and other watercourses Field boundary Fragmented or inconsistent tree line or hedgerow

Table 4.6 Purpose 1 Assessment Criteria

Criteria	Score	Description
(a) Land parcel is located at the edge of a discrete built-up area.	YES	The sub-area is located at the edge of a large built-up area with physical or perceptual connections.
	NO	The sub-area is not at the edge of a large built-up area, in physical or perceptual terms.
(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary.	5+	Sub-area is contiguous with two or more large built-up areas and the inner boundaries with large built-up areas lacks definition and / or permanence OR Sub-area is connected to a large built-up area. There are no outer boundary features to prevent disproportionate / irregular sprawl and the edge of the large built-up area(s) lacks definition and / or permanence.
	5	Sub-area is contiguous with two or more large built-up areas and the edges of the large built-up area are strongly defined and permanent boundaries. OR Sub-area is connected to a large built-up area. There are outer boundary features to prevent disproportionate / irregular sprawl, however the edge of the large built-up area is a strongly defined and permanent boundary.
	3+	Sub-area is connected to a large built-up. There are outer boundary features present to restrict the scale of growth and regularise development form, however the edge of the large built-up area lacks definition and / or permanence.
	3	Sub-area is connected to a large built-up area. There are outer boundary features present which may restrict the scale of growth and regularise development form and the edge of the large built-up area is a strongly defined and permanent boundary
	1+	Sub-area is enclosed by a large built-up area, however the edge of the large built-up area lacks definition and / or permanence.
	1	Sub-area is 'enclosed' by a large built-up area and the edge of the large built-up area is a strongly defined and permanent boundary.
	0	Sub-area is not at the edge of a large built-up area and does not meet purpose 1.

Table 4.8 Purpose 2 Assessment Criterion

Criteria	Score	Description
Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up area.	5	5: Sub-area forms an 'essential gap', where development would significantly visually or physically reduce the perceived or actual distance between settlements.
	3	3: Sub-area forms a gap, or part of a gap, where there may be scope for some development, but where the overall openness and the scale of the gap is important to restricting merging.
	1	1: Sub-area forms a 'less essential' gap, or the less essential part of a gap, which is of sufficient scale and character that development is unlikely to cause merging between settlements.
	0	0: Sub-area does not protect a gap between neighbouring settlements.

Table 4.9 Purpose 3 Assessment Criterion

Criterion	Score	Description
Protects the openness of the countryside and is least covered by development.	5	Sub-area contains less than 3% built form and possesses a strong unspoilt rural character
	4	Sub-area contains less than 5% built form and/or possesses a strong unspoilt rural character.
	3	Sub-area contains less than 10% built form and/or possesses a largely rural character.
	2	Sub-area contains less than 15% built form and/or possesses a semi-urban character.
	1	Sub-area contains more than 15% built form and / or possesses an urban character.
	0	Sub-area contains more than 20% built form and possesses an urban character.

Table 4.10 Purpose 4 Assessment Criterion

Criterion	Score	Description
Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	5	Sub-area plays an important role in maintaining the immediate context of the historic place by providing [unspoilt] vistas of surrounding countryside from within the place or unbroken vistas into the place from afar and protects open land which has a strong connection with the historic place.
	3	Sub-area plays a role in maintaining the context of a historic place by providing vistas of surrounding countryside from within the place or unbroken vistas into the place from afar or protects open land which has a strong immediate connection with the historic place.
	1	Sub-area has a weak relationship with a historic place. There is little sense that the Green Belt contributes to immediate context of a historic place.
	0	Sub-area does not abut an identified historic place or provide views to a historic place and does not meet this purpose.

3.3 The Stage 2 Review further considers each sites contribution to the strategic land parcel (from the 2013 Green Belt Review Purposes Assessment (GB 03.01) in which the site is located, and the impact of removing it from Green Belt. In section 4.5.2 it says:

A qualitative assessment was undertaken to identify the roles of the sub-areas as part of the Stage 1 GBR parcel within which it is located and the wider Green Belt. Where relevant, the cumulative loss of adjacent sub-areas was also considered. For sub-areas located on or over the district boundaries, consideration was given to available results from neighbouring authority Green Belt assessments.

The qualitative assessments considered the following:

- What is the role of the sub-area in the context of the GBA Strategic Land Parcel within which the sub-area is located? How does the performance of these areas compare? How important is the sub-area to the performance of the Strategic Land Parcel?*
- Would the potential release of a sub-area impact on the assessment of adjacent sub-areas? For example, would the scores of the adjoining sub-area(s), be likely to change as a result of the sub-division and if so to what extent?*
- Would the potential release of a sub-area harm the long-term protection or integrity of the surrounding Green Belt?*

For each sub-area, an overall conclusion was made on the level of contribution to the wider strategic Green Belt – important, partly important or less important. This was judged qualitatively, based on a composite judgement of the factors described above.

- 3.4 Section 5 of the same document then sets out specifically how each site has been scored (assessed) for each assessment criterion.

Q4 How did the evidence in the Stage 2 Green Belt Review inform decisions about which sites to allocate?

- 4.1 The Stage 2 Green Belt Review concluded that 60 of the 182 sites were recommended for further consideration as to whether they should be removed from Green Belt and allocated in the draft Local Plan.
- 4.2 Of the 60 sites 'recommended for further consideration', all were included in the draft Plan unless there were specific reasons not to. In total, 40 were included as allocations in the draft Local Plan and proposed to be removed from the Green Belt.
- 4.3 The remaining 20 sites were not included as allocations in the draft Local Plan for the reasons set out below:

Site	Reason for not including as an allocation in the draft Local Plan	Relevant document in examination library
SA-9/RA-5	It is not considered that a suitable access and transport solution has a reasonable prospect of being provided within the Plan period;	Green Belt Buffer Sites Not Recommended to Progress GBS Recommended (2024) (LPSS 02.12)
SA-12/RA-8	The site has characteristics that met the criteria for an extension to the Chilterns National Landscape into St Albans City & District where technical work is being undertaken by Natural England	Green Belt Buffer Sites Not Recommended to Progress CNL Proformas (2024) (LPSS 02.13)
SA-38/RA-24	The site has characteristics that met the criteria for an extension to the Chilterns National Landscape into St Albans City & District where technical work is being undertaken by Natural England	Green Belt Buffer Sites Not Recommended to Progress CNL Proformas (2024) (LPSS 02.13)
SA-39/RA-23	The site has characteristics that met the criteria for an extension to the Chilterns National Landscape into St Albans City & District where technical work is being undertaken by Natural England	Green Belt Buffer Sites Not Recommended to Progress CNL Proformas (2024) (LPSS 02.13)
SA-41/RA-25	The site has characteristics that met the criteria for an extension to the Chilterns National Landscape into St Albans City & District where technical work is being undertaken by Natural England	Green Belt Buffer Sites Not Recommended to Progress CNL Proformas (2024) (LPSS 02.13)
SA-44/RA-26	The site has characteristics that met the criteria for an extension to the Chilterns National Landscape into St Albans City & District where	Green Belt Buffer Sites Not Recommended to Progress CNL Proformas (2024) (LPSS 02.13)

Site	Reason for not including as an allocation in the draft Local Plan	Relevant document in examination library
	technical work is being undertaken by Natural England	
SA-58/RA-33	The site is too small to accommodate 5 or more home once the site restrictions were taken into consideration	Green Belt Buffer Sites Not Recommended to Progress GBS Recommended (2024) (LPSS 02.12)
SA-74/RA-35	The requirement to retain the existing use (recreational open space)	-
SA-10/RA-6	The site is too small to accommodate 5 or more home once the site restrictions were taken into consideration	Green Belt Buffer Sites Not Recommended to Progress GBS Recommended (2024) (LPSS 02.12)
SA-31/RA-19	The site is too small to accommodate 5 or more home once the site restrictions were taken into consideration	Green Belt Buffer Sites Not Recommended to Progress GBS Recommended (2024) (LPSS 02.12)
SA-2/RA-2	The requirement to retain the existing use (recreational open space)	Green Belt Buffer Sites Not Recommended to Progress GBS Recommended (2024) (LPSS 02.12)
SA-11/RA-7	The site has characteristics that met the criteria for an extension to the Chilterns National Landscape into St Albans City & District where technical work is being undertaken by Natural England	Green Belt Buffer Sites Not Recommended to Progress CNL Proformas (2024) (LPSS 02.13)
SA-34/RC-5	The requirement to retain the existing use (sewage treatment works)	-
SA-48/RC-7	The requirement to retain the existing use (recreational open space)	-
SA-49/RA-28	The site is too small to accommodate 5 or more home once the site restrictions were taken into consideration	Green Belt Buffer Sites Not Recommended to Progress GBS Recommended (2024) (LPSS 02.12)
SA-57/RA-32	The site is too small to accommodate 5 or more home once the site restrictions were taken into consideration	Green Belt Buffer Sites Not Recommended to Progress GBS Recommended (2024) (LPSS 02.12)

Site	Reason for not including as an allocation in the draft Local Plan	Relevant document in examination library
SA-61/RA-34	The requirement to retain the existing use (secondary school)	-
SA-104/RA-40	The requirement to retain the existing use (recreational open space)	-
SA-113/RA-44	The site is too small to accommodate 5 or more home once the site restrictions were taken into consideration	Green Belt Buffer Sites Not Recommended to Progress GBS Recommended (2024) (LPSS 02.12)
SA-111/RA-43	The site has been already developed to the extent that 5 or more homes could not be accommodated	-

- 4.4 The capacity of the 40 sites included as allocations in the draft Local Plan and proposed to be removed from the Green Belt, when combined with the capacity of sites in urban areas, would not have fully met the Standard Method calculation for housing need for St Albans City and District. Therefore, further releases of Green Belt were considered. Details of this process are considered further in The Local Plan Site Selection – Proforma Methodology Paper (September 2024) (LPSS 02.02), and in the Council’s response to Matter 2, Issue 5, Questions 6 to 8.

Q5 Where the evidence recommended that areas were not taken forward for further consideration, how did the Council consider this in the plan-making process?

- 5.1 The methodology for the assessment proformas is set out in Local Plan Site Selection Proforma Methodology Paper (2024) (LPSS 02.02).
- 5.2 Where the Stage 2 Green Belt Review (2023) (GB 02.02) did not recommend a site for further consideration, and the site lay outside of a relevant buffer¹¹, then the site was not considered further in the plan-making process. This is because such sites were not considered to be suitable due to their less sustainable location and because development on such sites would create holes in the Green Belt, leading to fragmentation.
- 5.3 Where the Stage 2 Green Belt Review (2023) (GB 02.02) did not recommend a site for further consideration, but the site lay within or partly within a relevant buffer¹², then a full assessment of the site was undertaken. The outcomes of the full assessments can be found in Green Belt Buffer Sites Not Recommended to Progress Part 1 Proformas (2024) (LPSS 02.10), Green Belt Buffer Sites Not Recommended to Progress Part 1 Proformas Addendum (2024) (LPSS 02.09), and Green Belt Buffer Sites Not Recommended to Progress Part 2 Proformas (2024) (LPSS 02.11).

¹¹ 400m buffers were applied around St Albans, Harpenden, Hemel Hempstead, Watford, Radlett and Hatfield. 250m buffers were applied around Bricket Wood, Chiswell Green, How Wood, London Colney, Park Street/ Frogmore, Redbourn, Wheathampstead, Shenley, Blackmore End, and Abbots Langley.

¹² Ibid

Q6 How was the potential for mitigation considered in the Stage 2 Green Belt Review? Was this considered on a consistent basis for all sites?

6.1 Assuming the question is referring to boundary mitigation then the Stage 2 Green Belt Annex Proforma Report (2023) (GB 02.03) considered the need for any boundary mitigation associated with each of the 182 parcels identified in the Stage 2 Green Belt Review (2023) (GB 02.02).

6.2 Section 5.8 of the Stage 2 Green Belt Review (2023) (GB 02.02) describes how mitigation was considered. It says:

The consideration of sub-area boundary strength identified where removal of a sub-area from the Green Belt could result in boundaries that were stronger, weaker, or comparable to existing. Where boundary weaknesses were identified, mitigation might be required, for example through strengthening existing partial boundary features or creation of a new boundary feature. The boundary consideration for each sub-area can be found in the assessment pro-formas in the Annex Report.

6.3 This was considered on a consistent basis for all sites. Each proforma included a section as below:

Considerations of Boundaries	
Commentary on boundary features and impact on green belt boundary strength.	STEP 6: Assessment of sub-area boundaries in relation to NPPF definition (paragraph 143f) and identification of potential mitigation that might be required if sub-area was released.
Categorisation & Recommendation	
Sub-area category & recommendation	STEP 7: Categorisation and recommendation of sub-area for either retention or further consideration drawing together the purpose

Consideration of Boundaries	
Commentary on boundary features and impact on Green Belt boundary strength.	The inner boundary and outer boundary to the west of the sub-area are readily recognisable and likely to be permanent. The outer boundaries to the north, north-east and south are predominantly recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundary to the west would meet the NPPF definition; however, the remaining new inner Green Belt boundaries would not meet the NPPF definition. The new boundary would require strengthening.
Categorisation & Recommendation	

Q7 Does the evidence consider 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, as required by paragraph 147 of the Framework?

7.1 Yes, Section 7 of the Stage 2 Green Belt Review (2023) (GB 02.02) explores ways in which compensatory improvements to the environmental quality and accessibility of remaining Green Belt land can be achieved. It does this through case studies of other local planning authorities that have planned for the release of land from Green Belt through their own local plans.

7.2 Section 7.6 of the Stage 2 GBR states that:

... Paragraph 142 of the NPPF sets out that where Green Belt land is released for development, the Local Plan should set out ways in which the impacts of this can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. Where possible, such improvements should focus on opportunities to improve poorly performing Green Belt, either through strategic initiatives or local enhancements. Planning Practice Guidance sets out that compensatory improvements should focus on supporting evidence on landscape, biodiversity or recreational needs.

The Council could consider embedding the need for compensatory improvements into a Local Plan policy, for instance in line with policies to support the principles of improving Green Infrastructure Networks. In order to ensure that compensatory improvements are delivered, PPG sets out that early engagement with landowners and interest groups is necessary.

Overall, compensatory improvements must be considered for any release of Green Belt land; improvements may be delivered in different forms as deemed appropriate by the Council with regards to the status of the remaining Green Belt land and in relation to strategic or local green infrastructure needs

7.3 The Stage 2 Green Belt Review (2023) (GB 02.02) does not make recommendations on specific compensatory improvements related to sites that the study recommends for further consideration, however the draft Local Plan contains a policy, Policy LG6 - Green Belt Compensatory Improvements. This sets out:

Green Belt Compensatory Improvements

3.58 Where it is concluded that loss of Green Belt land for development is necessary, national policy sets out that compensatory improvements to the environmental quality and accessibility of remaining Green Belt land are expected.

LG6 – Green Belt Compensatory Improvements The allocations in Part B that are facilitated by Green Belt boundaries changed by this Plan are required, to a degree proportionate to the development, to:

a) Submit a Green Belt compensation strategy that sets out compensatory measures that align with national planning guidance, relating to:

- i. New or enhanced green infrastructure;*
- ii. Woodland planting;*
- iii. Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- iv. Improvements to biodiversity, habitat connectivity and natural capital;*
- v. New or enhanced walking cycling or equestrian routes; or*
- vi. Improved access to new, enhanced or existing recreational and playing field provision.*

b) Retain existing hedgerows and trees and other areas of biodiversity value such as ponds;

c) Enhance existing green and blue infrastructure links within their sites, and connect any fragmented links, to provide biodiversity (also known as wildlife corridors). Development must also take account of green and blue infrastructure links beyond their sites and try to integrate their designs with them and not create severance through poor design;

d) Maintain any Rights of Way across / through the site, ensuring provision of a route that is safe and overlooked, is sufficient in width to easily allow the passing of two people, and is carefully designed to become a positive landscape feature. Should a diversion to any Rights of Way be unavoidable, replacement routes must be provided to the satisfaction of the Council and the relevant highway authority;

e) Ensure access to adjacent Rights of Way are facilitated in a safe and direct manner and maintain linkages that provide for appropriate utility and recreational use, and ensure that improvements are enabled so as to mitigate for the increased user impact of the development on the fabric of the network, including through good design;

f) Provide woodland buffer planting when adjacent to established urban areas overlooking what was once open countryside. NB: Where a development is required to submit both a Green Belt compensation strategy and provide Suitable Alternative Natural Greenspace (SANG), the Green Belt compensation strategy can incorporate features that are proposed within the SANG, in accordance with this policy.

7.4 Specific compensatory measures are listed for some proposed allocations¹³ in Part B of the draft Local Plan.

¹³ The proposed allocations with specific compensatory measures are H1, H2, H3, H4, B1, B2, B3, B4, B5, L1, M3, M4, M6, M7, M8, M9, M13, M15, and M16

- 27 Paragraph 149 of the Framework states that if it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.

Q8 How has the Council considered ‘washed over’ settlements within the Green Belt? Are any changes proposed and/or necessary based on the evidence presented?

- 8.1 Sections 4.7 to 4.11 and Section 6 of the Stage 2 Green Belt Review (2023) (GB 02.02), together with the Green Belt Review Washed Over Villages Report (2023) (GB 02.04) considered ‘washed over’ settlements in the Green Belt. The methodology is set out in Sections 4.7 to 4.11 of the Stage 2 Review and the recommendations in Section 6 of the same document. The table below summarises the methodology:

Step	Details
1. Washed Over Village Identification	<p><i>This step considered which settlements should be included in the assessment. In the comparative examples, local authorities typically rely on the settlement hierarchy, where one exists, to identify which settlements constitute a village. The starting point was [...] the Local Plan settlement hierarchy [...], which identifies Green Belt settlements as the smaller villages located within the Green Belt.</i></p> <p><i>In addition, [...] development at the former Napsbury Hospital site was considered as a potential washed over village</i></p> <p>(Source: Section 4.7 of the Stage 2 Green Belt Review (2023) (GB 02.02))</p>
2. Defining Village Boundaries	<p><i>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.</i></p> <p><i>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.</i></p>

Step	Details
	(Source: Section 4.8 of the Stage 2 Green Belt Review (2023) (GB 02.02))
3. Site Visits	<p><i>All villages were visited by qualified landscape architects to understand their immediate context, character and boundary features, and to refine the initial analysis. Photographs of all villages were taken (where access and views permitted) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider Green Belt and adjacent settlement(s).</i></p> <p>(Source: Section 4.9 of the Stage 2 Green Belt Review (2023) (GB 02.02))</p>
4. Washed Over Village Assessment	<p><i>The assessment process involved a mixture of evidence from desk-based research as well 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.</i></p> <p><i>The assessment is intended to determine if the village still meets the NPPF policy (paragraph 144) for continued inclusion within the Green Belt.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p>(Source: Section 4.10 of the Stage 2 Green Belt Review (2023) (GB 02.02))</p>
5. Categorisation and Recommendations	<p><i>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.</i></p>

Step

Details

Thus, if a village does not have an open character, consequently it cannot make an important contribution.

Table 4.16 Washed Over Village Categorisation / Recommendations

Open Character Assessment	Openness Assessment	Recommendation
Village has an open character	The open character makes an important contribution to openness	Village should remain washed over
Village has an open character	The open character does not make an important contribution to openness	Village should be inset
Village does not have an open character	Assessment not undertaken	Village should be inset

(Source: Section 4.11 of the Stage 2 Green Belt Review (2023) (GB 02.02))

- 8.2 The Stage 2 GBR (GB 02.02) recommended that all the settlements that are currently ‘washed over’ settlements in the 1994 Local Plan, remain as ‘washed over’ settlements in the draft Local Plan to 2041 and the findings and summary set out in section 6.1 of the Review are provided below. The Council has taken these recommendations forward.

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, Sleapshyde 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.

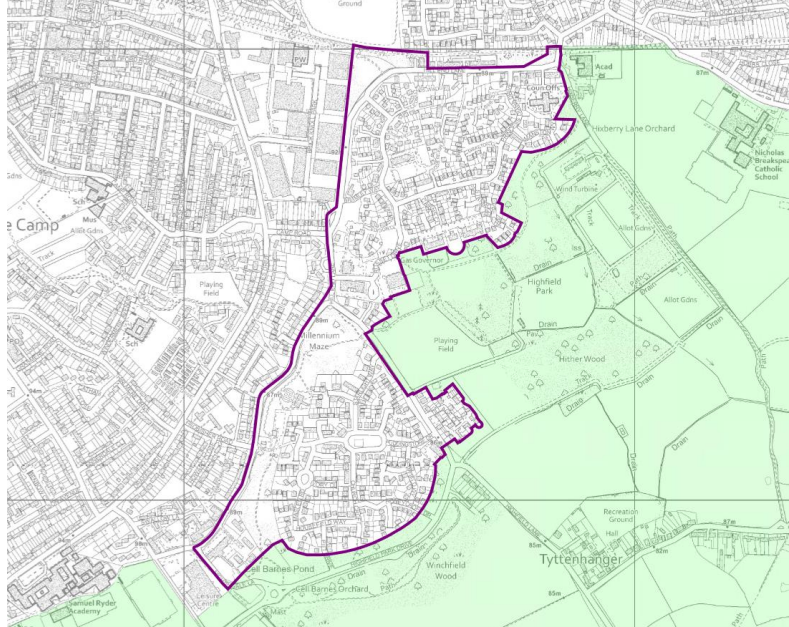
The findings of the Washed Over Villages Study, concluded that; each of the settlements had an open character and all of the settlements’ open character was determined to make an important contribution to the openness of the Green Belt with the exception of Radlett Road and Frogmore which was deemed 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.


Q9 Aside from sites proposed for development, are any other alterations proposed and/or considered necessary to the existing Green Belt boundary?

- 9.1 Yes, there are four proposed alterations to the Green Belt boundary that do not form part of sites proposed for development in the draft Local Plan.
- 1 – Highfield and Cell Barnes, St Albans
 - 2 – Orchard Drive, How Wood
 - 3 – Barnes Wallis Way, Bricket Wood
 - 4 – Waddington Lane, Wheathampstead
- 9.2 The first, third and fourth alterations are considered necessary in order to accurately reflect the nature of completed development now on the ground. These are areas where there has been significant built form completed since the Green Belt boundary was last altered through the adoption of the District Local Plan Review 1994. These areas of proposed release are suburban in character and physically adjoin areas currently excluded from the Green Belt, such that they now form part of the urban areas of (1) St Albans (3) Bricket Wood and (4) Wheathampstead respectively.
- 9.3 The second, Orchard Drive, How Wood has planning permission for residential development of 30 homes and the development has commenced. There is also a Parish Council owned children's play facility. This area has had significant built form started and/or completed since the Green Belt boundary was last altered through the adoption of the District Local Plan Review 1994. This area of proposed release is suburban in character and physically adjoins an area currently excluded from the Green Belt, such that it now forms part of the urban area of How Wood.

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Changes since District Local Plan Review 1994

Number	Address	Reduction in Green Belt (approx. in hectares)	Description to justify exceptional circumstances	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
1	Highfield and Cell Barnes, St Albans	51.75	Alteration includes developments that took place post adoption of the District Local Plan Review 1994, which now form part of the built-up urban area.	

Number	Address	Reduction in Green Belt (approx. in hectares)	Description to justify exceptional circumstances	Snapshot showing extent of Green Belt boundary alteration.
2	Orchard Drive, How Wood	2.39	The area has planning permission for residential development of 30 homes and development has commenced. There is also a Parish Council owned children's play facility. This area has had significant built form started and/or completed since the Green Belt boundary was last altered through the adoption of the District Local Plan Review 1994. This area of proposed release is suburban in character and physically adjoins an area currently excluded from the Green Belt, such that it now forms part of the urban area of How Wood.	<p>Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.</p> 

Number	Address	Reduction in Green Belt (approx. in hectares)	Description to justify exceptional circumstances	<p>Snapshot showing extent of Green Belt boundary alteration.</p> <p>Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.</p>
3	Barnes Wallis Way, Bricket Wood	2.76	Alteration includes developments that took place post adoption of the District Local Plan Review 1994, which now form part of the built-up urban area.	

Number	Address	Reduction in Green Belt (approx. in hectares)	Description to justify exceptional circumstances	Snapshot showing extent of Green Belt boundary alteration. Purple boundary denotes the proposed change, with shaded area in Green showing the proposed new Green Belt boundary, contained within the District.
4	Waddington Lane, Wheathampstead	0.47	Alteration includes developments that took place post adoption of the District Local Plan Review 1994, which now form part of the built-up urban area.	