ARUP

St Albans City & District Council

St Albans Stage 2 Green Belt Review

Final Report

Final Report | June 2023

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 280045

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1. Introduction

1.1 Study Purpose

Arup was appointed by St Albans City & District Council (SACDC) to prepare a Stage 2 Green Belt Review (GBR). It is intended to provide a robust local review of the District's Green Belt and countryside, including the washed over villages, to help inform work carried out as part of the emerging Local Plan.

St Albans is subject to pressures, including the Government policy requirements to plan positively for growth. The authority is tightly constrained by the Metropolitan Green Belt and has limited urban capacity. The council is planning for growth up to 2040, but also needs to take account of potential development needs beyond the plan period. As part of this process, the council needs to consider what role, if any, Green Belt land will play in any future spatial strategy. This study will help provide the evidence to enable the council to make robust decisions.

The review incorporates three key elements:

- A summary and review of the previous Green Belt work undertaken in St Albans.
- Identification and assessment of sub-areas (including previously developed land) within the Green Belt to assess the extent to which they meet Green Belt purposes.
- Assessment of washed over villages to ascertain whether these villages should remain washed over by the Green Belt or be inset from the Green Belt.

If Green Belt land is proposed for release as part of the Local Plan spatial strategy compensatory improvements to environmental quality and accessibility of remaining Green Belt land will be required. This study also provides advice on how such compensatory improvements can be delivered.

1.2 Role of Green Belt Review

The purpose of a GBR is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the National Planning Policy Framework (NPPF, 2021). The Local Planning Authority then take the findings of the review into account alongside other evidence in making decisions about the Local Plan strategy, site allocations / broad locations and ultimately possible alterations to Green Belt boundaries.

A GBR forms an important part of the evidence base. It helps a council determine the manner and degree to which change in the Green Belt could be considered without damaging the purposes for including land in the Green Belt and the degree to which harm to the Green Belt would result if development were to take place.

Typically, a GBR is undertaken in two stages. The first stage examines the performance of a district's Green Belt in its entirety. While the second stage is more granular and examines the performance of discrete and small Green Belt parcels, primarily adjacent to existing urban areas or in locations where new settlements are being proposed as part of emerging growth options.

A GBR is not a policy or decision-making document that proposes any release of Green Belt land, this is for a council to determine. It falls to a council to assess the sustainability and delivery of areas of land assessed and recommended through a GBR, as appropriate, as part of the wider plan-making process.

Green Belt is not the only consideration when assessing the suitability and deliverability of sites identified for allocation within an area. A council is not precluded from allocating Green Belt sites for development if other factors in favour of the site outweigh this consideration. Such factors might include:

- Unique / significant housing or employment need and a lack of supply of more preferential sites (i.e. those that the NPPF directs towards before considering Green Belt).
- Adverse implications for the sustainable development strategy within the district.
- Inherent sustainability of directing growth in a particular direction.
- Tightly drawn Green Belt boundaries and constraints on alternative sites.
- The opportunity to deliver social infrastructure, which would bring about long-term benefits for local residents.
- Boosting housing delivery in areas with past issues of deliverability to increase the supply of affordable housing.

A GBR does not set out exceptional circumstance arguments, which will need to be demonstrated if a Council proposes release of land from the Green Belt. Although the outcomes from a GBR will form part of any exceptional circumstances case presented to support Green Belt alterations.

1.3 Study Context

SADC previously submitted a replacement Local Plan in March 2019, although this was subsequently withdrawn in November 2020. The Council submitted a Green Belt Review Purpose Assessment[1] (Stage 1) and Green Belt Review Sites and Boundaries Study[2] (Stage 2) as part of the evidence base for the Local Plan. However, the Green Belt evidence, in particular the Stage 2 GBR was questioned by the Inspectors. SACDC therefore subsequently decided to prepare a new Stage 2 GBR, (i.e. this study) to address the concerns raised.

As explored later in Section 3, the SKM Stage 1 GBR is considered a robust evidence base, which assesses the performance of the entirety of the St Albans Green Belt against the NPPF Green Belt purposes. Therefore, the findings from the Stage 1 GBR on the weakest performing Green Belt have been drawn forward into the identification of sub-areas for this Stage 2 study.

However, to address previous criticisms at the SKM Stage 2 GBR, this Stage 2 GBR study takes a more granular and comprehensive approach to identifying sub-areas for assessment (as set out in Section 4.2). It not only sub-divides the Stage 1 recommended areas where appropriate but also identifies additional sub-areas for assessment. The additional sub-areas are based on promoted sites within defined buffers around existing settlements in St Albans and neighbouring authorities. The additional sub-areas lie within both strongly and weakly performing strategic parcels (as defined in the Stage 1 GBR).

In this Stage 2 GBR study, all proposed sub-areas were filtered to remove land subject to major policy constraints and sub-area boundaries were defined in relation to NPPF requirements. Such an approach is consistent with that in neighbouring authorities including Dacorum (which shares the same Stage 1 Green Belt Review evidence base) and Hertsmere. The methodology has also been informed by experience elsewhere including authorities where Local Plans (and underpinning

[1] SKM (2013) Green Belt Review Purposes Assessment for Dacorum, St Albans and Welwyn Hatfield, Final Report

[2] SKM (2014) Green Belt Review Sites and Boundaries Study, Prepared for St Albans City and District Only

evidence) have been found sound, such as Runnymede where the Green Belt evidence was commended by the Inspector (see Section 2 and Appendix A2.2 and A3).

1.4 Structure

The paper is structured as follows:

- Section 2 sets out the implications for this assessment from a review of planning policy, guidance, legal precedents and experience elsewhere for Green Belt reviews. The full reviews can be found in Appendix A.
- Section 3 provides the local Green Belt context. It also sets out the preceding Green Belt work including summary outcomes of the SKM Stage 1 GBR and implications for this Stage 2 GBR.
- Section 4 presents the methodology for the Stage 2 GBR for both the sub-areas and washed over villages. The methodology was subject to review by Duty to Cooperate partners. Comments and responses can be found in Appendix B.
- Sections 5 and 6 present the key findings for the Green Belt and Washed Over Village assessments respectively.
- Section 7 considers compensatory improvements in the event that any Green Belt is lost in St Albans as a result of the Local Plan process.
- Section 8 sets out the conclusions from this study

The accompanying Annex Reports contain the assessment pro formas for each of the Green Belt sub-areas and washed over villages assessed.

2. Policy, Guidance and Experience Elsewhere Context

The purpose of a Green Belt Review is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the NPPF. Local planning authorities may then take the findings of the review into account alongside other evidence in making decisions about their Local Plan Strategy, site allocations / broad locations and ultimately possible alterations to Green Belt boundaries.

The Stage 1 GBR set out the relevant national and local policy framework for undertaking such an assessment, as well as relevant guidance and good practice identified elsewhere. As far as this is still relevant given the publication of the revised NPPF, it has continued to shape the methodology for the GBR Stage 2. This section therefore identifies additional findings from a review of policy, guidance, legal precedents and experience elsewhere since the Stage 1 GBR was undertaken (Appendix A), in particular the implications for undertaking this assessment:

2.1 Implications for Stage 2 Purpose Assessment

- There is no Government defined methodology for carrying out a Stage 2 assessment and local authorities have therefore taken a variety of approaches to-date.
- Authorities typically take a staged approach to Green Belt assessment, which has been commended at examination[3]. Stage 1 GBR focus on the entirety of the Green Belt within an authority, dividing the Green Belt into strategic parcels for assessment. Some authorities assess the strategic as well as local roles of the Green Belt in a Stage 1 GBR. While a Stage 2 GBR is more spatially focussed, typically assessing weakly performing Green Belt identified in Stage 1 and call for sites / buffers around existing urban areas.
- Green Belt should be assessed against the purposes set out in NPPF and, if any purpose is to be excluded, there must be a robust rationale. Any methodology must clearly set out how the purposes have been interpreted and should respect the local context, for example in relation to the definition of key terms[4].
- Authorities have used only those purposes deemed relevant to the local context and key terms in relation to interpreting national purposes have been defined. Qualitative approaches are primarily used in assessments.
- Purpose 4 is only assessed in some authorities where it is deemed relevant due to the local historic context. While purpose 5 is typically excluded as a non-differentiating factor in Green Belt assessments.
- Green Belt assessment should take account of good practice advice and comparator studies[5].
- Changes to Green Belt are not generally supported by the NPPF, as the general extent has already been established and given Green Belt's intended permanence. Any proposed changes will need to be supported by a robust exceptional circumstances case, which is fully justified and evidenced. The GBR will only provide the starting point and it will be necessary for the

[3] Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

[4] David Smith, Inspector, (24 January 2018), *Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030*

[5] Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

Council to develop the exceptional circumstances case, both at strategic and site level, as part of the wider Local Plan process[6].

- Openness and permanence are key considerations in terms of Green Belt; and are therefore integral to the assessment of Green Belt across all purposes[7].
- Various planning appeals have highlighted important considerations around the interpretation and importance of 'openness of the Green Belt' and therefore how this is applied in a Green Belt assessment[8].
- Openness is generally considered to be 'land free from built development', which should be assessed on an individual area basis as well as in terms of the cumulative impact on adjacent areas[9].
- Openness should be considered not only in terms of a 'volumetric approach' (i.e. physical coverage of built form) but also in terms of 'visual elements' (for example, visual linkages between settlements in relation to purpose 2, or functional character and linkages to the wider Green Belt in relation to purpose 3)[10].
- While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, is not a mandatory determinative factor[11].
- A thorough approach must be taken to the identification of sub-areas for assessments, particularly where there is a risk that objectively assessed housing need would not be met without amending Green Belt boundaries[12].
- Detailed Green Belt assessment does not need to be carried out for land covered by major policy constraints, for example flood zone 3b or sites of international or national nature conservation importance, which would preclude development in any case[13].
- When assessing whether an area can be removed from the Green Belt, consideration should be given to the presence or otherwise of readily recognisable and likely to be permanent boundary features[14].
- Evidence from Green Belt assessments should be reviewed in conjunction with broader evidence of the suitability and deliverability to justify exceptional circumstances for amendments to the boundaries. Proposed amendments to the Green Belt should be intrinsically linked to a district's overall spatial strategy and there has to be a degree of certainty over the

[6] NPPF (2021) paragraphs 143-144

[7] NPPF (2021)) paragraph 137; and Mel Middleton, Inspector (December 2017) *Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan.*

[8] Planning Inspectorate (2018) Appeal Ref: APP / P1940/W/17/3183388 – Clovercourt Ltd v Three Rivers District Council; The Planning Inspectorate (2018) Appeal Ref: APP/ A0665/ W/ 17/ 3190601 – Clegg v Cheshire; Ministry of Housing, Communities and Local Government, Secretary of State (2018) Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd and The Howard Partnership Trust; Planning Practice Guidance (2021)

[9] The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

[10] See: Turner v Secretary of State CLG and East Dorset Council (2016) *EWHC 2728 (Admin)*

[11] Further information available here: https://www.supremecourt.uk/cases/uksc-2018-0077.html

[12] See: Mel Middleton, Inspector (December 2017) *Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan*

[13] Ibid.

[14] NPPF (2021) paragraph 143

deliverability of sites to justify the exceptional circumstances required to remove them from the Green Belt[15].

- Enhancement to Green Belt and compensatory improvements to quality and accessibility to remaining Green Belt to offset any loss of Green Belt is encouraged[16].

2.2 Implications for Washed Over Village Assessment

- 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, including:
  - Green Belt should prevent urban sprawl by keeping land permanently open.
  - Land should not be included within the Green Belt boundaries, which is unnecessary to keep permanently open.
  - 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.
  - Limited infill development is acceptable in some circumstances which would help to meet some local need on a small scale but would not adversely affect the village's character.
  - Green Belt boundaries should be clearly defined using physical features that are readily recognisable and likely to be permanent.
- 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 defined[17].
- 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 it assessed by an analysis of character and urban form, developed land, visual intervisibility, and continuity with surrounding open land.

[15] NPPF (2021) paragraph 140-142; and examination notes / reports, including Jonathan Bore, Inspector (23 March 2018) *Examination of the Guildford Borough Local Plan: Strategy and Sites, Inspector's Questions and Comments (No.1)*; Malcolm Rivett, Inspector (25 May 2016) *Vale of White Horse Local Plan 20131: Part 1 Examination – Inspector's Interim Findings*; and Roger Clews (11 March 2016) *Report on the Examination of the Birmingham Development Plan*

[16] NPPF (2021) paragraph 146, PPG (2021)

[17] This point is made in Paragraph 11 of the judgement by Centaur Homes against the decision of Cheltenham Borough Council (July 2019). Further information available here: Reference: APP/B1605/W/19/3225401

[18] Turner v Secretary of State CLG and East Dorset Council (2016) *EWHC 2728 (Admin)*

3. Local Green Belt Context

3.1 St Albans Green Belt

St Albans is tightly constrained by the Metropolitan Green Belt (Figure 3.1). Over 81% of the district comprises land in the Green Belt (equating 13,141 hectares). The original 1985 District Local Plan placed all the District within the Metropolitan Green Belt except for the main built-up areas, i.e. the towns and large villages (Table 3.1). The remaining small villages within the district are all washed over by the Green Belt. There are no non-urban areas within the district without a Green Belt designation[19]. Green Belt boundaries in the district have not altered since the adoption of the District Local Plan Review in 1994.

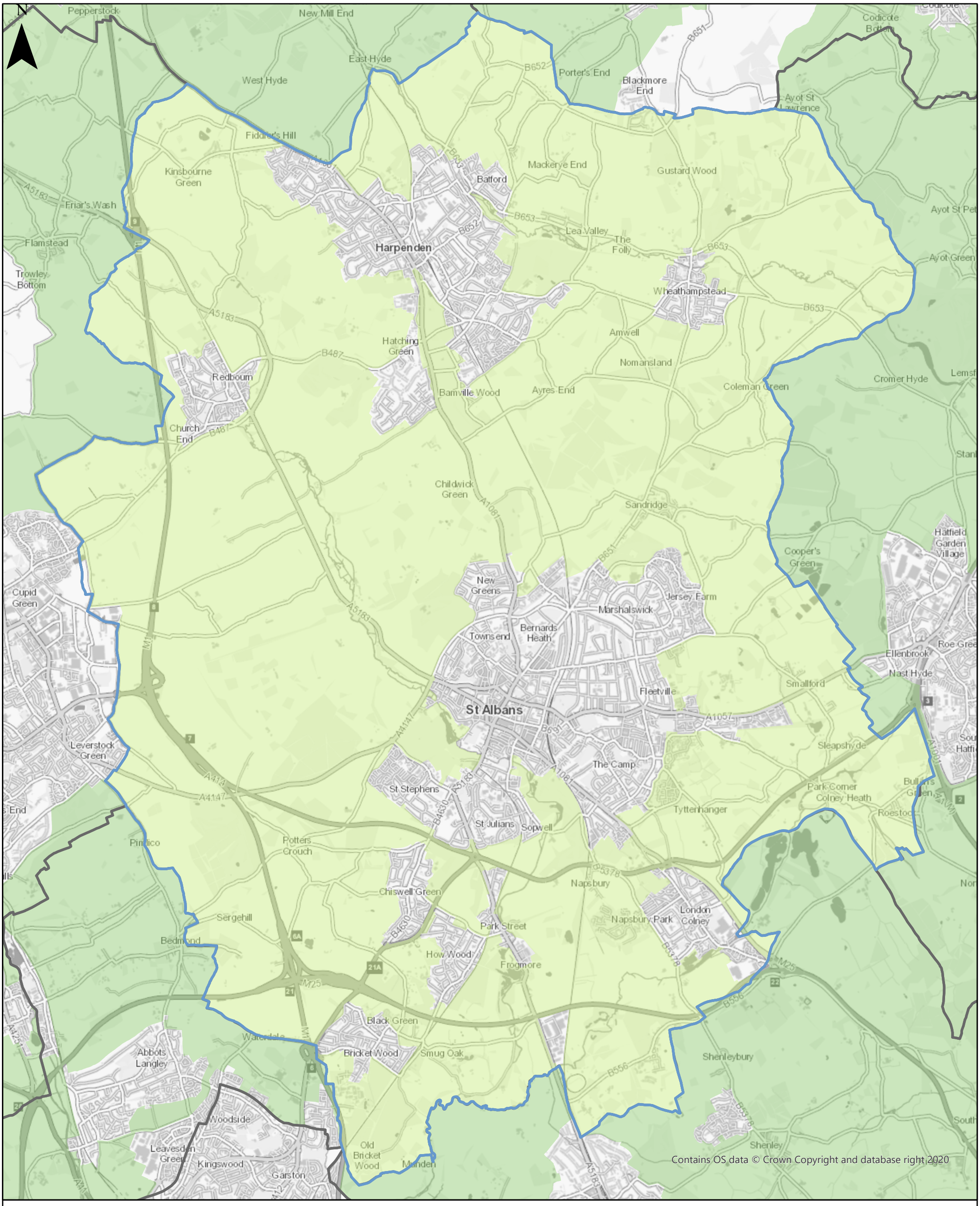
Table 3.1 St Albans Settlements

Type	Settlement
Town	St. Albans Harpenden
Large Village	Bricket Wood Chiswell Green How Wood London Colney Park Street/ Frogmore Redbourn Wheathampstead
Small Village	Annables and Kinsbourne Green Colney Heath Folly Fields Gustard Wood Lea Valley Estate Radlett Road and Frogmore Sandridge Sleapshyde Smallford

Source: City and District of St Albans (1994) District Local Plan Review

[19] Note: At the time of drafting the report, there was one relatively small area adjacent to Hemel Hempstead, which lies outside of the Green Belt. This area, known as Spencers Park Phase 2, had outline permission primarily for residential development.

A3



Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

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Issue	Date	By	Chkd	Appd
P3	05/11/2021	AD	KF	CT

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Figure 3.1 St Albans Green Belt

Scale at A3
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280045-00	**Issued**

Drawing No	Issue
001	**P3**

MXD Location

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3.2 SKM Stage 1 Green Belt Review[20]

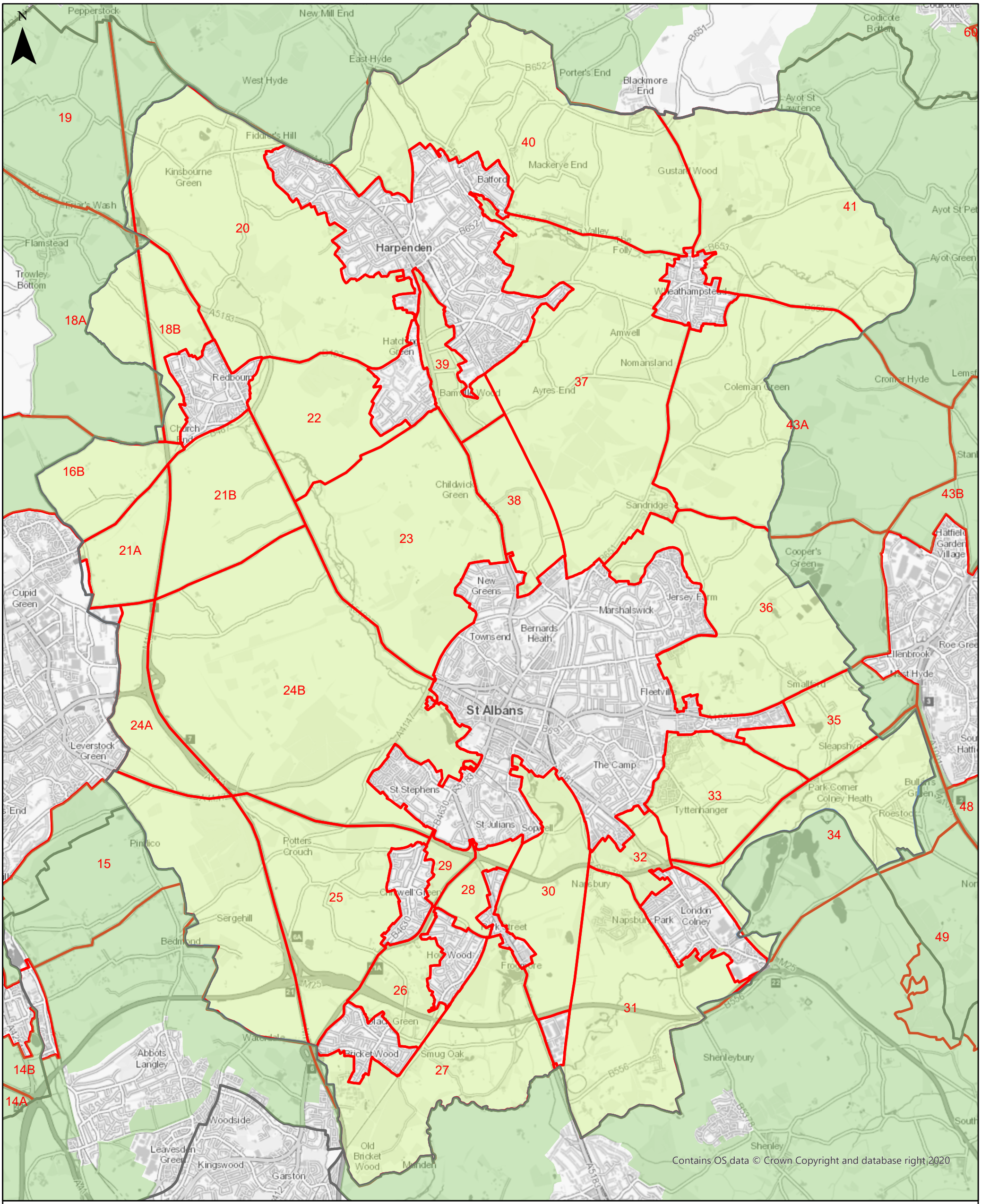
3.2.1 Purpose

SKM undertook a Stage 1 Green Belt Review Purpose Assessment on behalf of Dacorum Borough Council, St Albans City and Welwyn Hatfield Borough Council, which was published in November 2013. With regard to St Albans Council, the Review was commissioned to 'inform the emerging Local Plan and to meet NPPF requirements in the context of recent Inspector's decisions at Local Plan examinations.' The objectives of the Stage 1 Green Belt Review Purpose Assessment were to:

- Examine best practice in Green Belt reviews.
- Review the existing Green Belt in the study area, including the aim and purposes, and define strategic land parcels for analysis. Twenty-one strategic land parcels were identified in St Albans (Figure 3.2).
- Take full account of the wider Metropolitan Green Belt.
- Review the role of each of the strategic parcels in the context of the NPPF and consider the extent to which each contributes to the fundamental aim of retaining openness and the purposes of including land in the Green Belt.
- The study also considered how parcels contributed to the local purpose of maintaining the existing settlement pattern and provided an assessment of non-Green Belt land.
- Rank and score the strategic parcels by how well they contribute to the fundamental aim and purposes of the Green Belt.
- Consider whether, in the context of the NPPF, other areas of countryside on the study area should be proposed as Green Belt.
- Provide advice on the efficacy and consistency of existing local policies applying to the Green Belt in the study area.

[20] SKM (2013) Green Belt Review Purposes Assessment for Dacorum, St Albans and Welwyn Hatfield, Final Report

A3



Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt
- Stage 1 GBR Strategic Land Parcels

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Figure 3.2 SKM Stage 1 GBR Strategic Land Parcels

Scale at A3
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280045-00	**Issued**

Drawing No	Issue
001	**P3**

MXD Location

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3.2.2 Approach

The study was split into five distinct tasks, forming the overall assessment, as set out below:

- Task 1: Review of national and local policy (including definition of the role and purpose of the Green Belt), which informed the purpose assessment criteria to be employed.
- Task 2: Identification of strategic land parcels to be assessed against the purpose criteria.
- Tasks 3 and 4: Assessment of the level of contribution each strategic parcel makes, or could make, towards each of the purpose criteria.
- Task 5: Conclusion on the findings of the previous tasks and recommendations for next steps.

In addition to reviewing national and local policy (Task 1), the study also identified best practice from a review of previous Green Belt studies by other local authorities. This is considered best practice itself as recorded at the recent Runnymede Examination (see section 2.1 and Appendix A2.2.5).

The whole of St Albans Green Belt was assessed in the study. This is consistent with experience elsewhere (as highlighted in section 2.1 and Appendix A 3 - Table A3.1), which highlights the importance of taking a staged approach to Green Belt assessment with the first stage reviewing the entirety of the Green Belt sub-divided into strategic land parcels.

The study identified 21 strategic parcels within St Albans. The parcel boundaries generally followed well-defined physical features in line with NPPF policy (see Appendix A1.1.2). Based on experience elsewhere, the parcels were of an appropriate scale for the strategic level assessment (see Appendix A3).

The strategic land parcels were assessed against criteria based on purposes 1-4 as set out in the 2012 NPPF. Undertaking a Stage 1 Green Belt assessment based on purposes 1-4 of the NPPF only and excluding purpose 5 is a common approach undertaken by other Local Authorities (as highlighted in section 2.1 and Appendices A2 and A3).

The fifth purpose of the NPPF was not included in the Stage 1 review as it was considered that the extent to which the Green Belt can assist in urban regeneration could not be differentiated between the parcels. It was considered that the study area, and therefore Green Belt as a whole within this area, successfully and uniformly fulfilled this purpose. This argument aligns with the PAS guidance note[21] and has been similarly deployed in Green Belt reviews in other authorities and found sound at Examination (see section 2.1 and Appendix A2.2 and A3). As documented during the Redbridge Examination (see Appendix A2.2.3), if a purpose is to be excluded from an assessment the rationale must be clearly stated, which is the case for purpose 5 in the SKM Stage 1 GBR.

In addition to the NPPF purposes, the strategic land parcels were also assessed against a local specific purpose relating to maintaining existing settlement patterns. This additional purpose assessment criteria was considered appropriate and proportionate in the Stage 1 study, as the Green Belt plays an important role of separation within the context of the complex and dispersed settlement patterns across the study area. Again, this approach reflects experience elsewhere and accords with recent advice at Examination that assessment criteria should be relevant to the local context (see section 2.1 and Appendix A2.2).

It should be noted that the Stage 1 study was undertaken in the context of the 2012 NPPF. However, although there have been revisions to NPPF policy since this date, the majority of the policies relating to Green Belt remain unchanged in the 2021 NPPF, including its overarching aim and the five purposes. As the primary aim of the Stage 1 GBR was to test the performance of the Green Belt

[21] PAS (2015) Planning the Doorstep: The Big Issues – Green Belt

against the NPPF purposes, it is therefore considered to still be robust and aligned with national policy.

3.2.3 Key Findings

Most land within the study area exhibits high levels of openness, in terms of visual openness and an absence of built form, which is an essential characteristic of Green Belt.

In considering the strategic parcels that make up the Metropolitan Green Belt within the study area, it was found that all strategic land parcels, at least in part, clearly perform a key role and need to be given maximum protection into the future. Given this, however, there were a number of sub-areas within some of the strategic land parcels which were assessed as making the 'least contribution' to Green Belt purposes, and the degree to which the Green Belt contributes to the purposes varies across the study area.

A summary of the findings of the Stage 1 review against purposes one to four is provided.

Purpose 1 Assessment / Results

Purpose 1 To check the unrestricted sprawl of large built-up areas

The Stage 1 assessment of the strategic land parcels in meeting the purpose 1 looked at the contribution each parcel made towards checking sprawl of large built-up areas. These large built-up areas were identified in this study as London, Luton and Dunstable, and Stevenage. The majority of the strategic land parcels in St Albans had a limited contribution towards meeting this purpose, except for strategic land parcels 20, 40 and 41 which contributed significantly for the first two and partially for the last one. These strategic land parcels worked in unison with other Green Belt land, in the councils of Luton and Central Bedfordshire, to prevent the sprawl of Luton and Dunstable.

Purpose 2 Assessment / Results

Purpose 2 To prevent neighbouring towns from merging

The Stage 1 assessment considered to what degree strategic land parcels met this purpose by assessing them against 1st tier settlements within and outside of the study area. It found that a number of strategic land parcels constituted 'strategic gaps' between 1st tier settlements within St Albans, in particular preventing the merge of St Albans with Hemel Hempstead, Harpenden or Hatfield, and with neighbouring authorities, in particular preventing the merge of St Albans with Watford, Radlett, Borehamwood and the merge of Harpenden with Luton and Dunstable. All but two strategic land parcels were contributing at least partially to preventing towns from merging in St Albans.

Purpose 3 Assessment / Results

Purpose 3 To assist in safeguarding the countryside from encroachment

The assessment found that strong countryside characteristics were found throughout St Albans, and that the majority of strategic land parcels contributed to this purpose. Only three parcels, 26, 32 and 35 had a limited contribution towards safeguarding the countryside. A further seven strategic land parcels had a partial contribution while 15 strategic land parcels made a significant contribution towards the safeguarding of the countryside from encroachment. The southern strategic land parcels have the highest proportion of built development and can exhibit some urban fringe characteristics or ribbon development, which lowers their contribution towards purpose 3.

Purpose 4 Assessment / Results

Purpose 4 To preserve the setting and special character of historic towns

It was considered that many strategic land parcels made a significant or partial contribution to preserving the setting and character of historic towns, notably strategic land parcels to the south, west and north of St Albans, which preserve the views to the Cathedral and Abbey Church of St Albans. Overall, only ten strategic land parcels (15, 16B, 21A, 21B, 24A, 26, 29, 33, 36, 43A) within St Albans District have a limited contribution to meeting purpose 4; some of these parcels were partially located in neighbouring District Council areas. Twelve of the remaining strategic land parcels had a significant contribution.

3.2.4 Conclusions

The study concluded by stating that the Green Belt within the study area generally contributed to the four purposes. There were indications, however, that some boundary adjustments could be made without compromising the achievement of the overall purposes of the Green Belt. Indeed, potential adjustments could work to clarify and strengthen the Green Belt boundary in terms of its significance as a key policy tool.

In outlining where potential adjustments could be made, a number of strategic sub areas within St Albans were found to contribute least to the four Green Belt purposes and were identified for further assessment (Figure 3.3). These are:

GB21A and GB24A (SA-S1&S2) – Land enclosed by east Hemel Hempstead and M1

The parcels significantly contribute towards only 1 of the 5 purposes. They have a role in preventing towns from merging. However, there are strong urban influences in these parcels and openness is interrupted by the M1. A reduction in the size of the strategic parcel would not significantly compromise the primary function of the Green Belt.

GB36 (SA-S3) Area enclosed by residential development at east St Albans along Sandpit Lane

The site is enclosed by urban edges on three sides and although it significantly contributes to 3 of the 5 Green Belt purposes, its reduction in size would have a limited impact on the overall role of the Green Belt.

GB38 (SA-S4) Enclosed land at north St Albans along Sandbridgebury Lane

This parcel makes significant contribution towards 2 of the 5 purposes. This parcel has strong countryside characteristics, however, this sub-area also display urban fringe characteristics on two edges and given the scale of the 2.5km gap between St Albans and Harpenden, a reduction in size would not significantly compromise the physical separation of settlements.

GB40 (SA-S5) Enclosed land at north Harpenden in the vicinity of Luton Road, Counters End Land and Ambrose Lane

This strategic parcel makes significant contribution towards 4 of the 5 Green Belt purposes. However, the identified sub-area penetrated in urban area and display urban influence. Due to recent development and assessed in isolation, it makes a limited or no contribution towards the Green Belt.

GB40 (SA-S6) Enclosed land at northeast Harpenden along Lower Luton Road and extending to the vicinity of Whitings Close

This small sub-area follows an angular urban edge and displays urban characteristics. The existing filed patterns and boundary planting create a great sense of local landscape enclosure which contributes to screen the site from wider countryside and surroundings. Assessed in isolation, this parcel makes a limited or no contribution towards the Green Belt.

GB31 (SA-S7) Land south and south west of London Colney

This parcel only contributes significantly to 1 of the 4 purposes. The configuration of the site close to an urban edge and its proximity to the M25 reduce the countryside characteristics. Given the nature and scale of the local gap, which contains the M25, a limited reduction in the size of the parcel would not significantly compromise the physical separation of any settlements or the primary role of the Green Belt.

GB25 (SA-S8) enclosed land at Chiswell Land at Chiswell Green

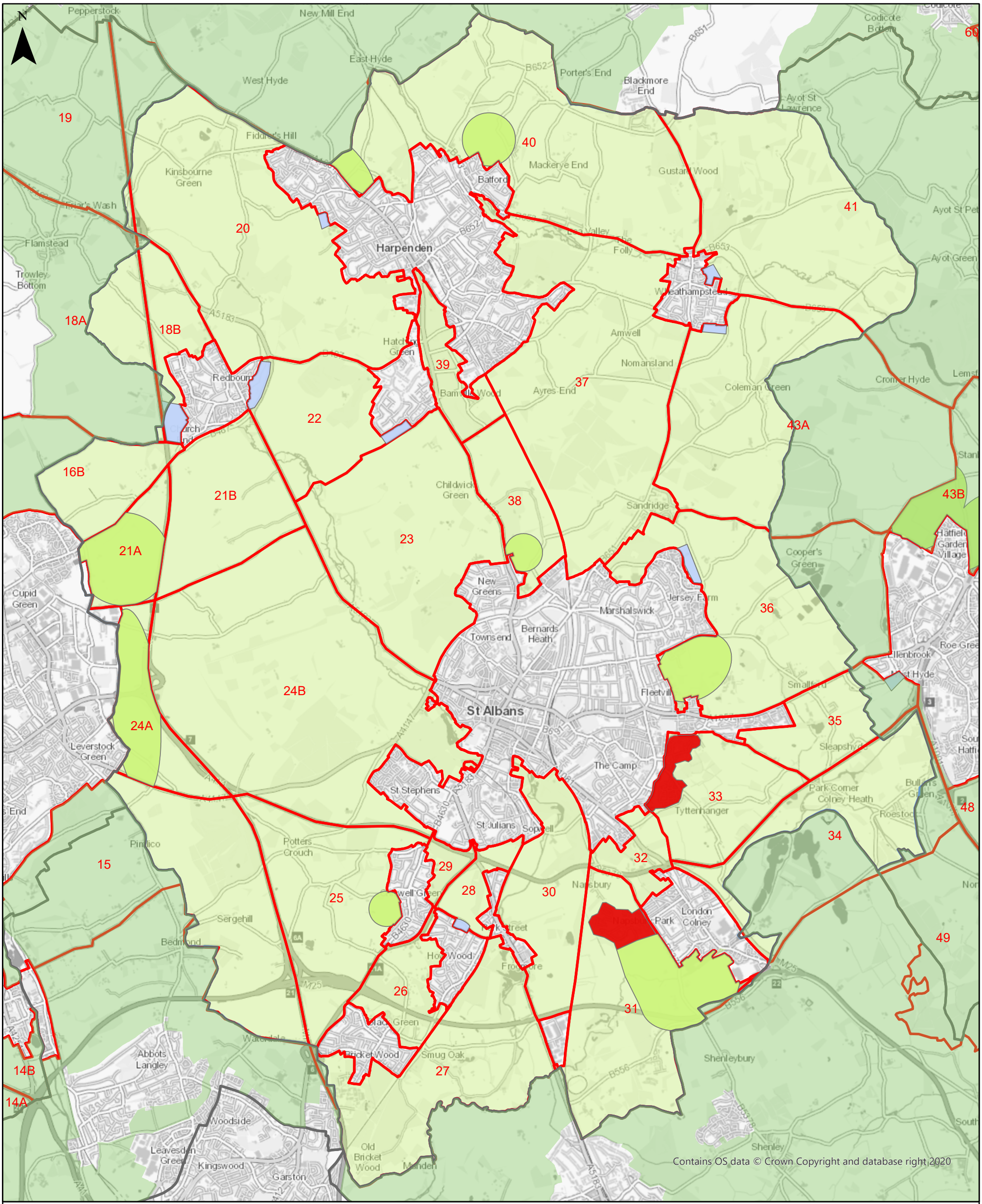
The parcel significantly contributes to 2 of the 5 Green Belt purposes. The parcel display significant urban characteristics due to the proximity of the settlement edge and Butterfly World along Miriam Road to the west. Localised planting along field boundaries and urban settlement create landscape enclosure on the site. This parcel presents the potential to integrate development into the landscape with lower impact on views from the wiser countryside and surroundings. Assessed in isolation, the parcel makes a limited or no contribution towards all Green Belt purposes.

Small Scale Sub-areas

Additionally, there were a number of small-scale sub areas that were found to contribute least to the Green Belt purposes. These areas are non-strategic in nature and therefore assumed that it will not significantly adversely impact upon the strategic function of the Green Belt. The Study recommends that these small-scale sub-areas be assessed in greater detail. In St Albans, these areas are:

- GB36 (SA-SS1) Land at northeast edge of St Albans, bound by House Lane to the and settlement edge to the south and west.
- GB18B (SA-SS2) Land at southwest edge of Redbourn, enclosed by the M1 to the west in the vicinity of Gaddesden Lane.
- GB22 (SA-SS3) Land at southeast edge of Redbourn, enclosed by A5186.
- GB20 (SA-SS4) Land at west of Harpenden, south of Falconers Field and north of Roundwood Park School
- GB22 (SA-SS5) Land south of Harpenden, enclosed by Beesonend Lane to the south and settlement edge to the north and east.
- GB28 (SA-SS6) Land north of How Wood, enclosed by Tippendell Lane to the north and settlement edge to the south, east and west
- GB43A (SA-SS7) Land south of Wheathampstead, to the south of Hill Dyke Road and enclosed by Dyke Lane to the east and settlement edge to the west.
- GB41 (SA-SS8) Land east of Wheathampstead, to the east of Brocket View.

A3



Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt
- Stage 1 GBR Strategic Land Parcels

SKM Stage 1 GBR Weakly Performing Areas

- Boundary Adjustment
- Small Scale Sub-area
- Strategic Sub-area

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Figure 3.3 SKM Stage 1 GBR Weakly Performing Sub-areas

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Boundary Adjustments

Furthermore, three locations were identified as being recommended for boundary adjustments as a result of development within the Green Belt, two of which are located in St Albans:

- GB33 (SA-BA1) Development at Highfield Park along southeast edge of St Albans
- GB31 (SA-BA2) Development at Napsbury Park to the west of London Colney

These changes were proposed in light of the substantial development which has affected Green Belt land in these locations. Development had caused the Green Belt boundary to be compromised and the study suggested redrawing the boundary alongside the new built edges. The study also suggested that further boundary adjustments may be identified by planning authorities in further detailed work. It will be for SACDC to decide whether to take these boundary changes forward as part of the final Local Plan spatial strategy.

3.3 SKM Stage 2 Study

3.3.1 Purpose

SKM undertook a Stage 2 Green Belt Review Sites and Boundaries Study[22] on behalf of St Albans City and District Council, which was published in February 2014. The main purposes of the study were to:

- Identify potential sites (with boundary lines) within the strategic sub-areas (identified in the Part 1 study) for potential release from the Green Belt for future development;
- Estimate the potential development capacity of each site; and,
- Rank the sites in terms of their suitability for potential Green Belt release.

3.3.2 Approach

The study considered the eight strategic parcels identified in the Stage 1 Assessment as requiring further investigation and undertook a more detailed assessment. No further assessment was undertaken on the seven small scale sub-areas identified in the Stage 1 assessment.

The study assessment was broken into three stages:

- Stage 1 Sub-area assessment: covering contribution to Green Belt purposes and planning history, as well as integration and landscape appraisal.
- Stage 2 Site assessment: focused on boundary review and contribution to Green Belt purposes, as well as consideration of developable area and development capacity.
- Stage 3 Site classification: evaluation of site suitability for potential Green Belt release and future development.

This approach differs from Stage 2 assessments undertaken elsewhere (see section 2.1 and Appendix A3). Key differences are:

- Narrow geographical focus – the majority of authorities take a more granular approach at Stage 2 examining Green Belt in buffers around settlements (and proposed new settlement locations where appropriate) and / or promoted sites within the Green Belt.

[22] SKM (2014) St Albans Green Belt Review: Sites & Boundaries Study

- Inclusion of a landscape appraisal embedded within the assessment, rather than a standalone assessment, and consideration of development capacity. Stage 2 assessments generally focus on the contribution of sites to the Green Belt and the robustness of Green Belt boundaries; they do not consider the potential of sites if released from the Green Belt as part of the assessment.

3.4 Inspectors Post Hearing Comments

The SKM Stage 1 and Stage 2 GBRs were submitted as part of the evidence base for the Examination of the replacement Local Plan in 2019. Following the Stage 1 hearings and the subsequent post hearing letters[23] from the Inspectors, the replacement Local Plan was withdrawn.

The post hearing letters raised concerns that there was inadequate evidence to support the exceptional circumstances case to alter Green Belt boundaries. The concerns related to the Green Belt evidence itself, site selection work and duty to cooperate. The specific concerns in relation to the Green Belt reviews was as follows:

- SKM Stage 2 GBR only examined the eight strategic sub-areas and made no further assessment of the small-scale sub-areas identified in the SKM Stage 1 GBR.
- Small scale sites (less than 500 dwellings or 14 ha) were excluded from the SKM Stage 2 GBR. Although the Stage 2 study acknowledges there may be other small-scale boundary changes that would not compromise the integrity of the Green Belt, no further work was undertaken on these opportunities.

3.5 Implications for Stage 2 GBR

The SKM Stage 1 GBR provides an analysis of the entirety of the St Albans Green Belt, which is judged to be in alignment with national policy and experience / best practice elsewhere. As a jointly commissioned study, it continues to be used by Dacorum and Welwyn Hatfield as part of their Local Plan evidence base. Its ongoing use in St Albans therefore provides continuity of approach on this strategic cross-boundary issue. The recommendations of the SKM Stage 1 GBR on the weakly performing areas therefore provide a good starting point for this Stage 2 review.

However, as detailed above, significant concerns regarding the scope of the SKM Stage 2 GBR were raised by the Inspectors following initial hearing sessions on Green Belt matters. As such, the SKM Stage 2 GBR is entirely replaced by this newly commissioned Stage 2 GBR. As well as addressing the Inspectors' concerns re the spatial scope of the study, it also affords the opportunity to adopt an approach to the assessment for the Stage 2 GBR that is more aligned with neighbouring authorities and wider experience elsewhere.

This Stage 2 GBR takes a more comprehensive and granular approach to identifying potential sub-areas to assess within the Green Belt. Not only does it re-consider the weakly performing strategic sub-areas and small-scale sub areas identified in the SKM Stage 1 GBR but also opportunities for potential release in the wider Green Belt. The exact process, including refinements to adjust for areas subject to major policy constraints and the application of a settlement buffer and to accord with NPPF policy on Green Belt boundaries, is detailed in section 4.2.

The SKM Stage 1 GBR recommended two boundary revisions following the substantive development of these locations. These locations are not examined further in this study, since they have already been recommended for release.

[23] Louise Crosby and Elaine Worthington (2020) Examination of the St Albans City and District Local Plan – ED40 Inspectors Post Hearing Letter 14.4.20; Louise Crosby and Elaine Worthington (2020) St Albans City and District Local Plan Examination – ED42 Inspectors Response to SADC Letter ED41A

4. Methodology

4.1 Overview

This section sets out the methodology for undertaking the Stage 2 GBR. The methodology has been developed to support and progress further the conclusions of the Stage 1 Green Belt Review Purpose Assessment, as well as to address the Inspector's concerns re the previous SKM Stage 2 GBR.

There is no agreed approach to undertaking a Green Belt review, therefore the methodology employed draws on the implications identified from the context review of policy, guidance and experience elsewhere (see Section 2 and Appendix A). It reflects best practice identified from other authorities, including those who's Local Plans have been through the Examination process and been found sound. The approach is also aligned with approaches taken in neighbouring authorities to ensure consistency with this cross-boundary strategic issue.

As part of the development of the methodology, the Council consulted with its duty to cooperate partners. Minor amendments were made to the methodology to ensure greater alignment with the methodologies employed by the surrounding authorities, as documented in Appendix B.

A stepped approach was undertaken for this study as summarised in Figure 4.1. Each stage of the methodology is discussed in full below.

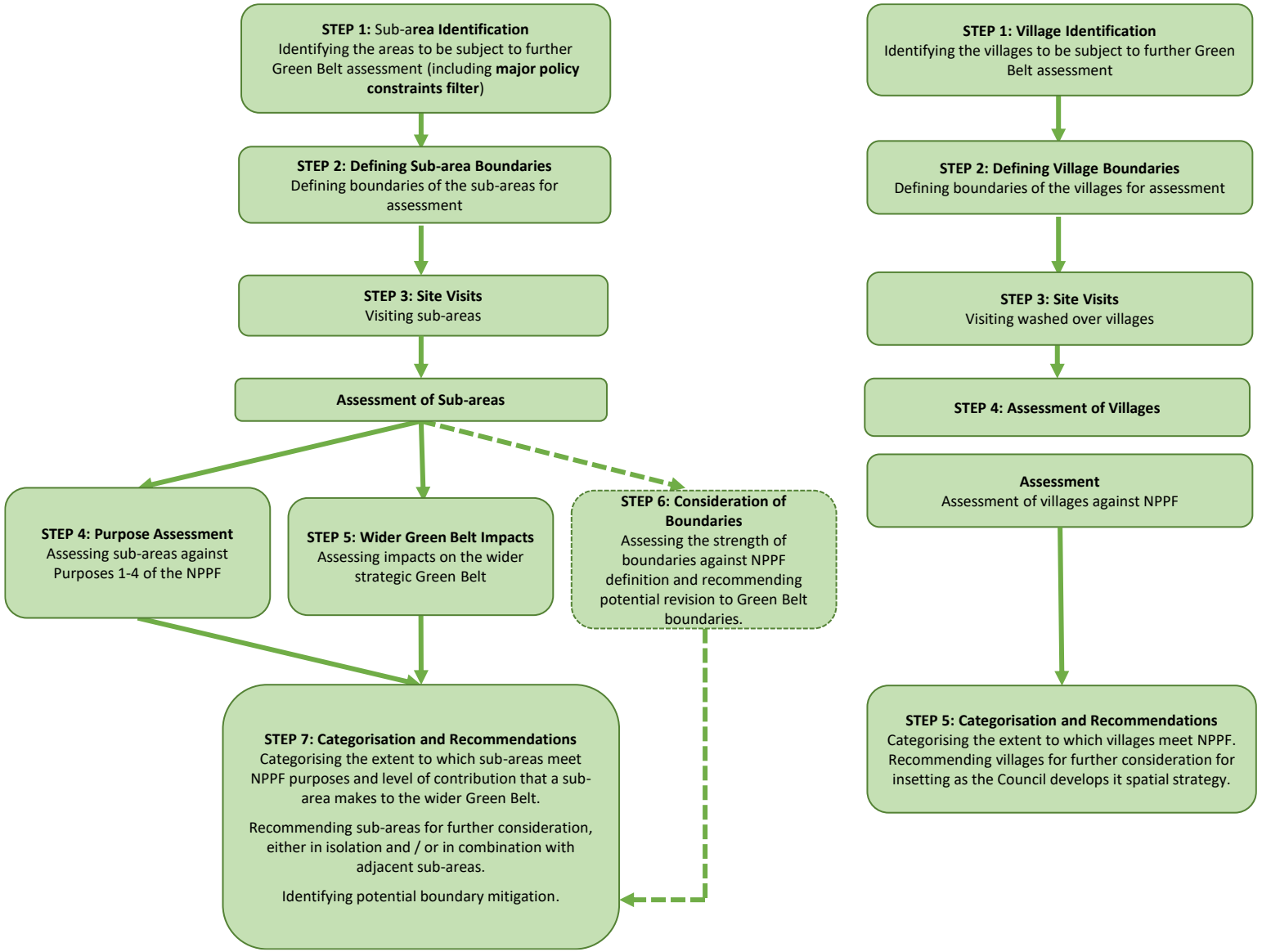
The Stage 2 GBR is more spatially focussed than the Stage 1 Green Belt Review Purpose Assessment, and therefore only smaller defined 'sub-areas' have been assessed (rather than the entirety of the Green Belt) as well as the washed over villages. The boundaries of the sub-areas and villages were defined in line with NPPF Green Belt boundary definition.

The assessment process itself drew on both primary evidence from site visits to all the sub-areas and washed over villages were visited (Step 3), as well desktop research. The assessment strands were brought together in the final Categorisation and Recommendations step to present whether a sub-area, or part thereof, or a washed over village should be potentially considered further.

The sub-areas were assessed against the NPPF (paragraph 138) purposes, and the role of the sub-area as part of the wider strategic Green Belt. The boundaries of each sub-area were reviewed, and a recommendation made regarding overall performance.

The contribution of washed over villages to the Green Belt was also considered against the NPPF (paragraph 144). The assessment explored whether the washed over villages are open in character and whether they contribute to the openness of the Green Belt. On this basis, a recommendation was made as to whether they should remain washed over in the Green Belt.

Figure 4.1 Methodology Diagram



4.2 Step 1: Sub-area Identification

The intention of this step was to identify sub-areas, which might potentially be released from or added to the Green Belt. There were three clear tasks:

- Define an area of search through the application of settlement buffers.
- Identify potential areas or sites within the buffers.
- Refine sites and area to remove land subject to major policy constraints.

Following the identification of sub-areas, the final task was to define defensible boundaries for them, as detailed in section 4.3.

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.

The identification of a buffer should not be taken as an indication that this land is necessarily the most sustainable, suitable or deliverable option for any future development. Areas of land which are assessed to perform less strongly against the Green Belt purposes will need to be balanced against wider local plan work to determine the preferred spatial growth option.

There is no specific guidance regarding the appropriate buffers to adopt, therefore regard was given to approaches in neighbouring authorities and authorities with similar characteristics and adjusting the approach to account for the local context. Given that there is no formal guidance or methodology, an element of professional judgement was therefore used to develop an approach appropriate to the district context.

In determining an appropriate buffer for the study, the Council and consultant team considered it appropriate to have regard to the following:

- Approaches taken in other local authorities with similar characteristics to St Albans (including Runnymede, Elmbridge, Spelthorne, Dacorum and Hertsmere – see Appendix A3.2).
- Overall size of the district, density of development and rural/urban character.
- The settlement hierarchy and local circumstances including settlement pattern and spacing.
- Extent of the green belt and landscape topography.
- Requirement for a robust and thorough assessment.

St Albans is a moderately sized authority located a few miles north of London. It is tightly constrained by the Metropolitan Green Belt, with no non-urban areas within the district without a Green Belt designation. The main settlements are the historic Cathedral City of St Albans and the

largely residential town of Harpenden, separated by a large swath of green belt. Located close to the main settlements, there are a number of smaller towns and villages with relatively small gaps between them, set in a predominantly agricultural landscape. Given the differing characters and scales of the settlements, two buffer scales were used to reflect the variations in the settlement hierarchy and to ensure that any future development would remain proportionate to the size of the existing built-up area.

As such, it was agreed that the character of the urban settlements and the approach for a finer grain assessment leant itself to a 400m buffer for the main settlements while a 250m buffer was considered reasonable buffer for lower order settlements (Table 4.1, Figure 4.2). These buffers indicate the likely maximum extent of sustainable development and vary accordingly to the position of the built-up area in the settlement hierarchy.

Buffers were also applied to the immediately adjacent settlements in neighbouring authorities, where the buffer would lead to some partial interception with SACDC green belt. As per St Albans, the buffer was applied to inset settlements only; the exception being Blackmore End in North Herts, which currently lies outside the Green Belt although immediately adjacent to both the North Herts and St Albans Green Belts[24]. The 400m buffer was applied to the highest order settlements and 250m buffer to lower order settlements in accordance with the settlement hierarchies[25] for the respective local authorities. The settlement buffers are shown in Table 4.1 and Figure 4.2.

Table 4.1 Settlement Buffers

Local Authority	400m buffer	250m buffer
St Albans	St Albans Harpenden	Bricket Wood Chiswell Green How Wood London Colney Park Street/ Frogmore Redbourn Wheathampstead
Dacorum	Hemel Hempstead	n/a
Hertsmere	Radlett	Shenley
North Hertfordshire	n/a	Blackmore End
Three Rivers	n/a	Abbotts Langley
Watford	Watford	n/a
Welwyn Hatfield	Hatfield	n/a

4.2.2 Potential Areas and Sites

To ensure that the assessment reflects the local context, the areas of assessment within the buffers were refined by taking into account:

- SKM Stage 1 GBR weakly performing land against NPPF purposes.
- Promoted sites identified through the Council's site selection work.
- Non-Green Belt land.

[24] The submission version of the North Hertfordshire Local Plan proposes extensions to the Green Belt that would lead to the enclosure of Blackmore End, which would attain inset settlement status.

[25] Dacorum Borough Council (2017) Settlement Hierarchy Study Main Report; Hertsmere Borough Council (2020) Planning for Growth, Settlement Hierarchy and Accessibility Mapping Analysis; North Hertfordshire District Council (2016) Local Plan 2011-2031, Proposed Submission; Three Rivers District Council (2011) Core Strategy; Welwyn Hatfield (20160 Draft Local Plan Proposed Submission

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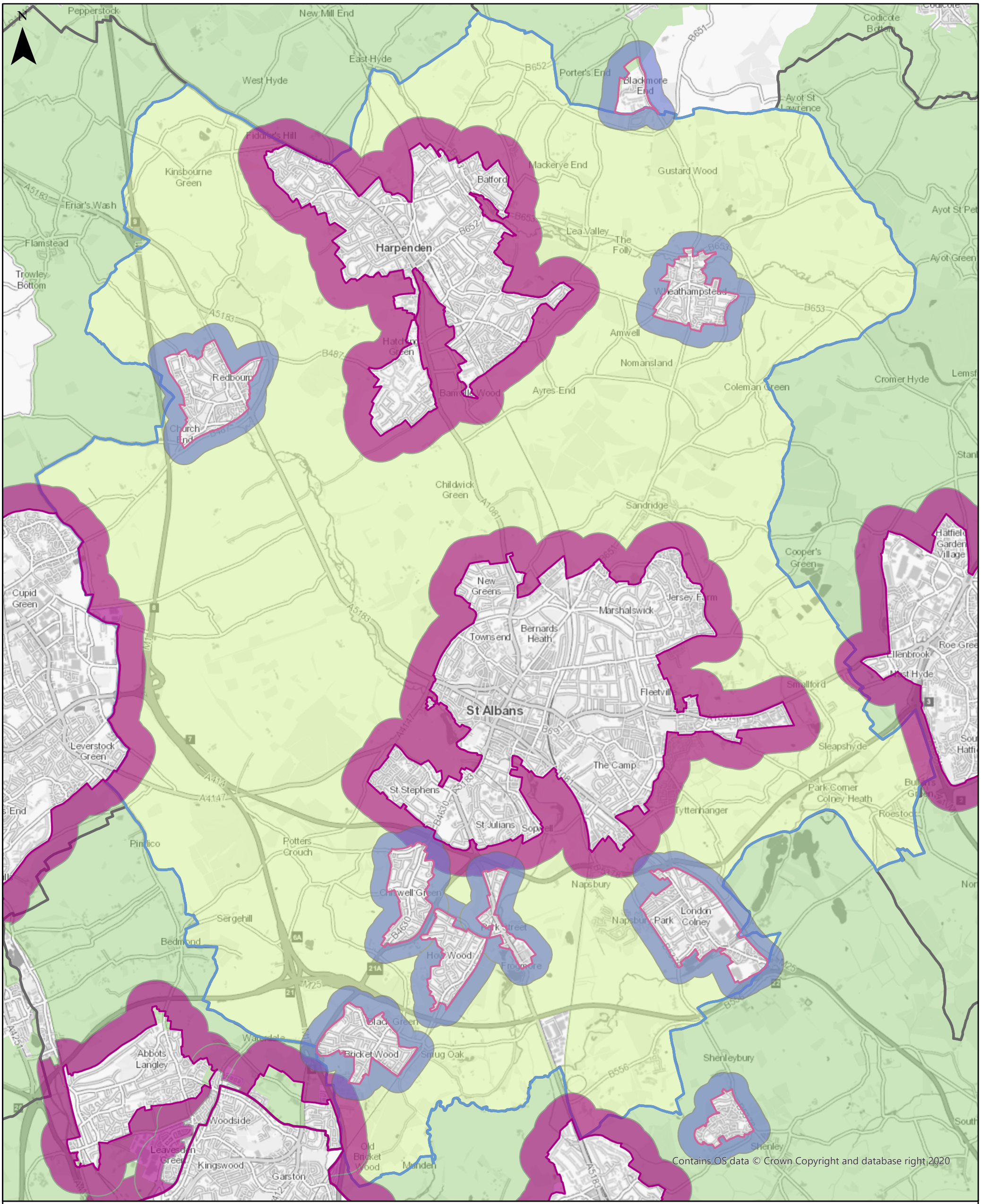

Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt
- Towns
- Specified Settlements
- 400m buffer
- 250m buffer

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Figure 4.2 Settlement Buffers

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Stage 1 GBR Weakly Performing Green Belt

The full list of eight strategic and eight small-scale sub-areas, (Figure 3.3), that contribute least towards Green Belt purposes as assessed in the SKM Stage 1 GBR were considered for this exercise. However, only those sub-areas that fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site entirely or partially within the settlement buffer (see application of settlement buffers), were taken forward.

Promoted Sites

In addition to the weakly performing sub-areas, all sites promoted in the 'call for sites' over the period 2016 and 2021, which are located in the Green Belt were considered. This is in support of the NPPF paragraph 68(a) requirement that planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period, and paragraph 68(b) specific, developable sites or broad locations for growth, for years 6-10, and where possible, for years 11-15 of the plan. The NPPF glossary defined 'deliverable; as sites for housing that are available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.

All sites promoted within (or partially within) the Green Belt were considered in this exercise. However, only those promoted sites that fell entirely or partially within the settlement buffer, or immediately adjacent to another area / site entirely or partially within the settlement buffer (see application of settlement buffers), were taken forward.

Non-Green Belt

Green Belt boundary revisions can take the form of an expansion as well as a contraction. For that reason, consideration of land that is not allocated as Green Belt for inclusion in the Green Belt is required. Based on previous experience of conducting Green Belt Reviews, the starting point for identifying non-Green Belt land was open land outside of the defined settlement limits set out in local development plans but not included in the Green Belt.

In the case of St Albans there are no non-urban areas within the district without a Green Belt designation, except one relatively small area adjacent to Hemel Hempstead which has outline planning permission primarily for residential development. Therefore, consideration was given as to whether there is open land within urban areas immediately adjacent to the Green Belt. Only a small number of locations were identified. However, these were already protected by other designations (e.g. Local Green Space) and therefore it was considered unnecessary to include them within this study, particularly in the light of NPPF paragraph 139, which emphasises that the extent of Green Belts across the country has already been established.

Application of the Settlement Buffers

The application of buffers meant that those areas and sites falling entirely or partially within the defined buffers were subject to further assessment. Where weakly performing sub-areas and promoted sites were located partially within a settlement buffer, the entirety of these areas and sites was taken forward for further consideration, i.e. essentially extending the buffer.

Areas or sites located outside of the settlement buffer fell into two categories:

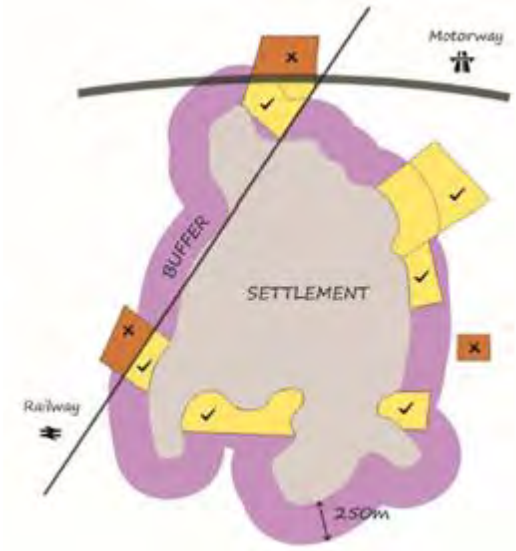
- Outside the buffer and no immediate adjacency to an area / site within the buffer. These areas or sites were discounted from further consideration.

- Outside the buffer but adjoining areas or sites located within the buffer. These areas and sites were included for further assessment. In this instance, this was limited to one site extension outside of the buffer.

In all instances, the exception to the inclusion of the entirety of a weakly performing area or a promoted site, was the presence of a motorway, A-road or railway line that forms a natural stop to the settlement. The final extent of the assessment sub-areas based on the included areas and sites was defined in relation to major policy constraints (see Section 4.2.3) and defensible boundary features (see Section 4.3).

Figure 4.3 illustrates how the process of applying settlement buffers was undertaken. The '✗' indicates where weakly performing areas / promoted sites were not assessed, with '✓' indicating weakly performing areas / promoted sites included within the assessment. Figure 4.4 shows weakly performing areas, promoted sites and settlements buffers.

Figure 4.3 Application of a Settlement Buffer



4.2.3 Major Policy Constraints

A filtering process to remove weakly performing areas or promoted sites, which were entirely or largely constrained by major policy constraints was also undertaken. These policy constraints effectively rule out development of the land. The following 'major' policy constraints' were used:

- Flood zone 3b (functional floodplain)
- Sites of Special Scientific Interest (SSSI) [26]
- Scheduled Monuments
- Registered Parks and Gardens
- Ancient Woodland.

Figure 4.5 illustrates the policy constraints considered in the assessment.

[26] Other sites of international and national nature conservation importance (i.e. Special Protected Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites) do not apply in St Albans

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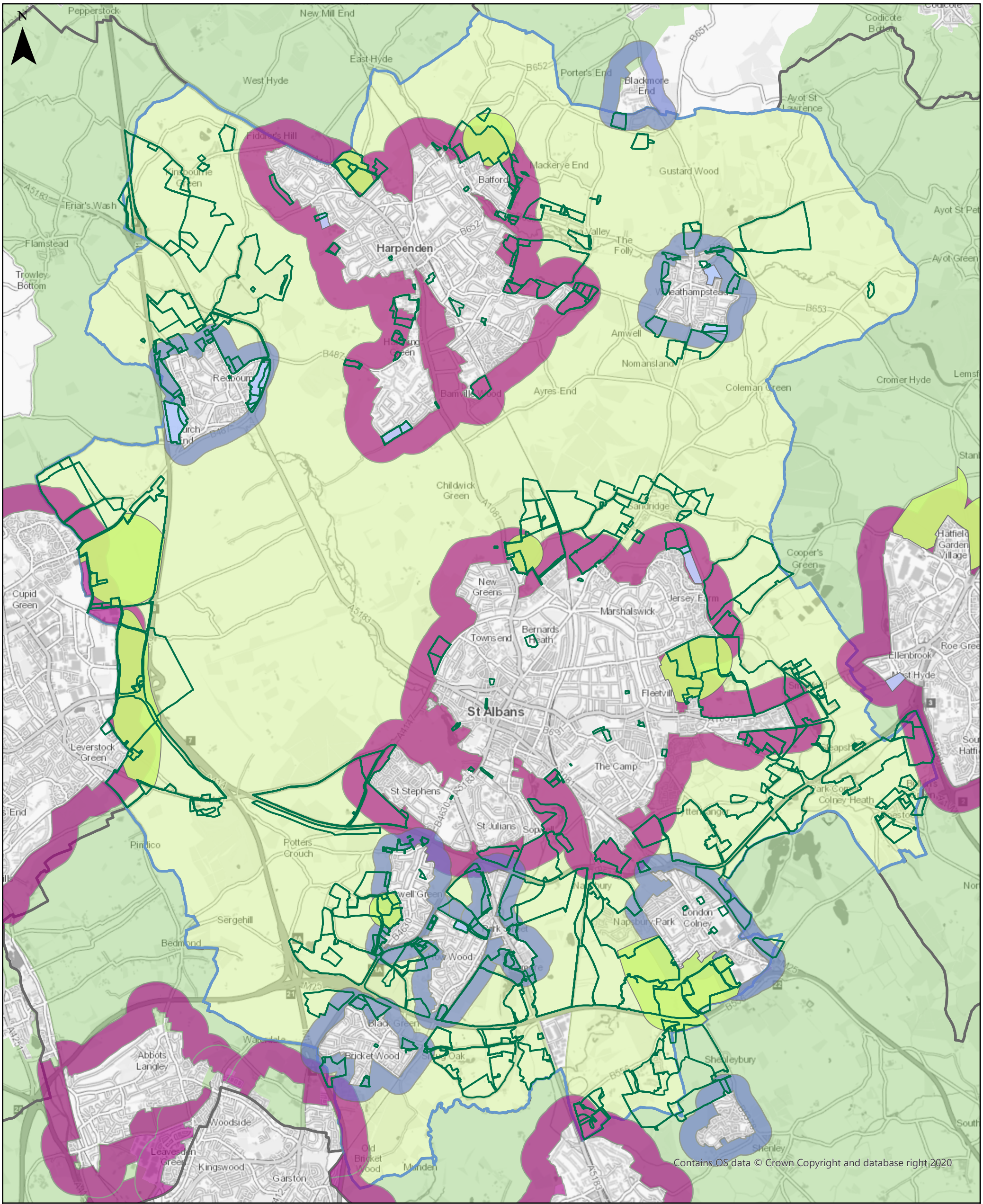

Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt
- Promoted Sites
- 250m buffer
- 400m buffer

SKM Stage 1 GBR Weakly Performing Areas

- Small Scale Sub-area
- Strategic Sub-area

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Figure 4.4 SKM Stage 1 GBR Weakly Performing Sub-areas, Buffers and Promoted Sites

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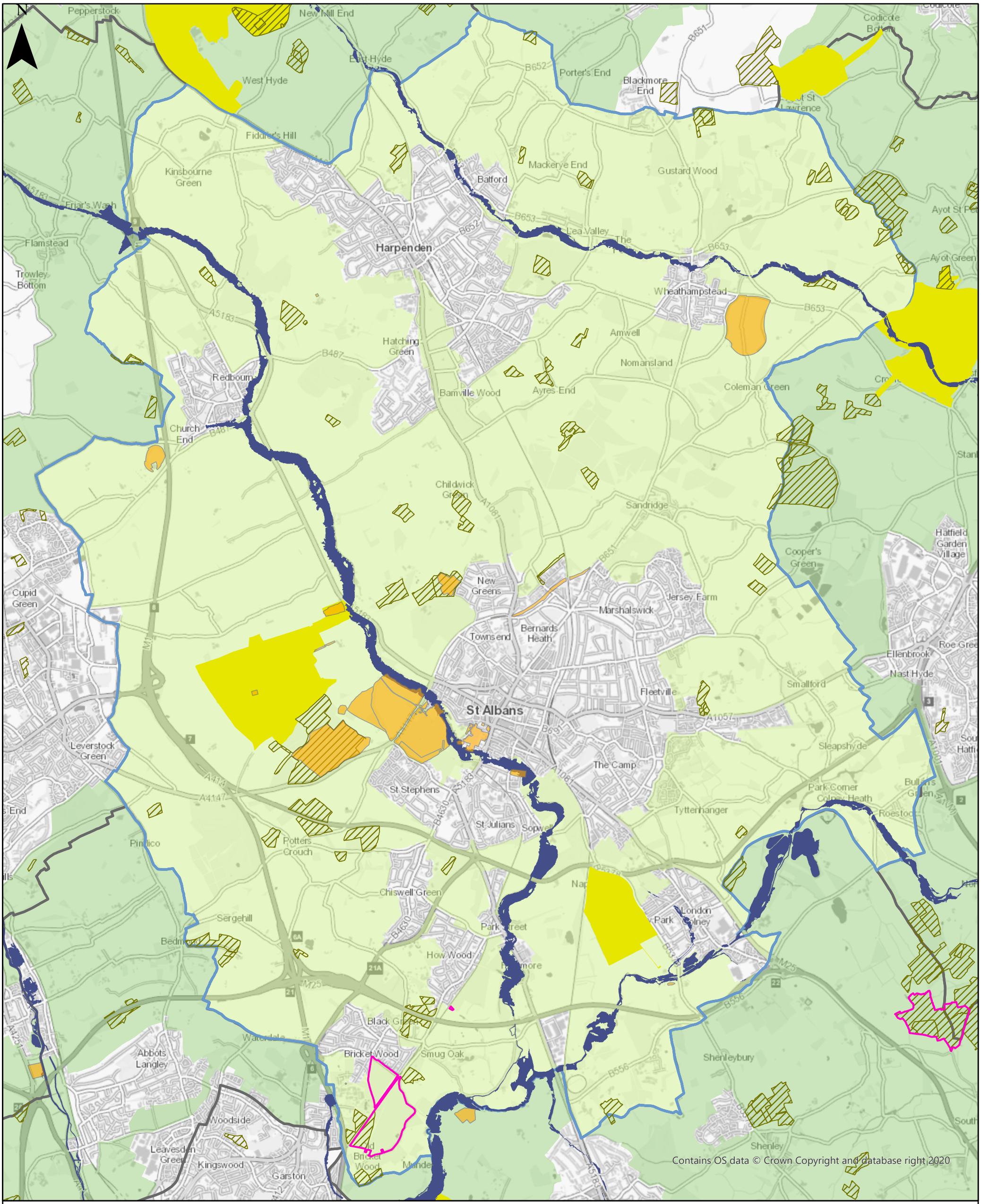

Legend

- Sites of Special Scientific Interest (England) © Natural England
- Scheduled Monuments
- Ancient Woodland England © Natural England
- Flood Zone 3b
- Historic Parks and Gardens © English Heritage
- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

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Figure 4.5 Major Policy Constraints

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4.3 Step 2: Defining Sub-area Boundaries

Given the requirement through paragraph 143 of the NPPF for Green Belt boundaries to be defined 'clearly, using physical features that are readily recognisable and likely to be permanent', it therefore follows that sub-areas should be defined, to reflect these principles from the outset.

The Stage 2 sub-areas boundaries were defined in line with the general principles used to identify the Strategic Land Parcels in the Stage 1 GBR. However, as Stage 2 sub-areas are smaller than Stage 1 Parcels, a wider range of boundary features had to be used to delineate the sub-areas. In locations where readily recognisable and permanent boundary features were absent, sub-area boundaries had to be drawn along features which were readily recognisable, but not necessarily permanent. In some locations readily recognisable and permanent boundary features were present but a policy constraint such as a flood zone was closer to the settlement edge and was therefore adopted as the boundary, as development could not take place in the area between the policy constraint and prominent boundary feature.

Permanent and readily recognisable boundary features (both man-made and natural) are listed in the first column of Table 4.2. The additional readily recognisable boundary features which are not necessarily permanent are listed in the second column of Table 4.2.

Table 4.2 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Feature
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

Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps 'birds eye' views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure 4.6 and 4.7).

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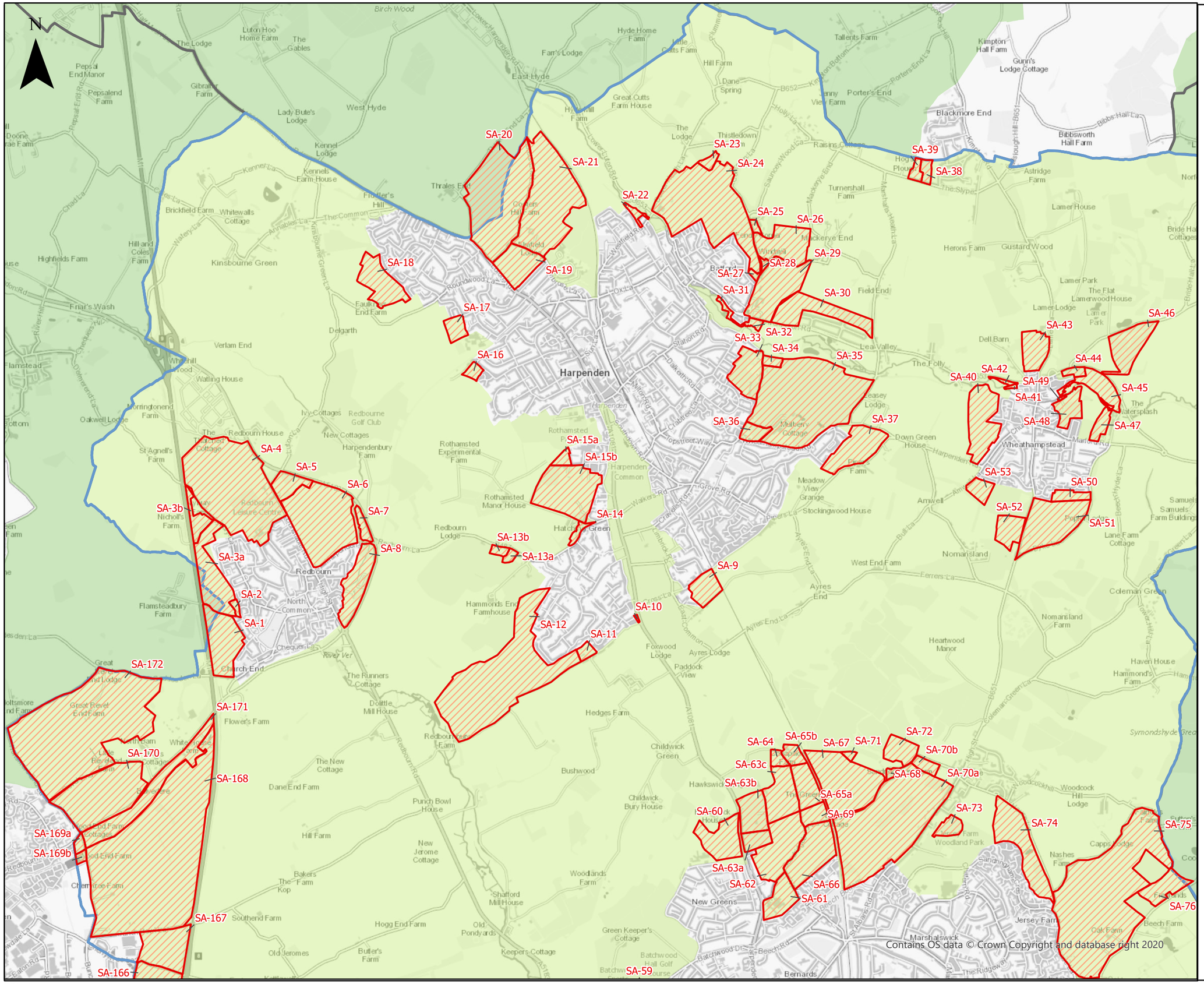

Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt
- Sub-area for assessment

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Figure 4.6 Sub-areas for assessment - north

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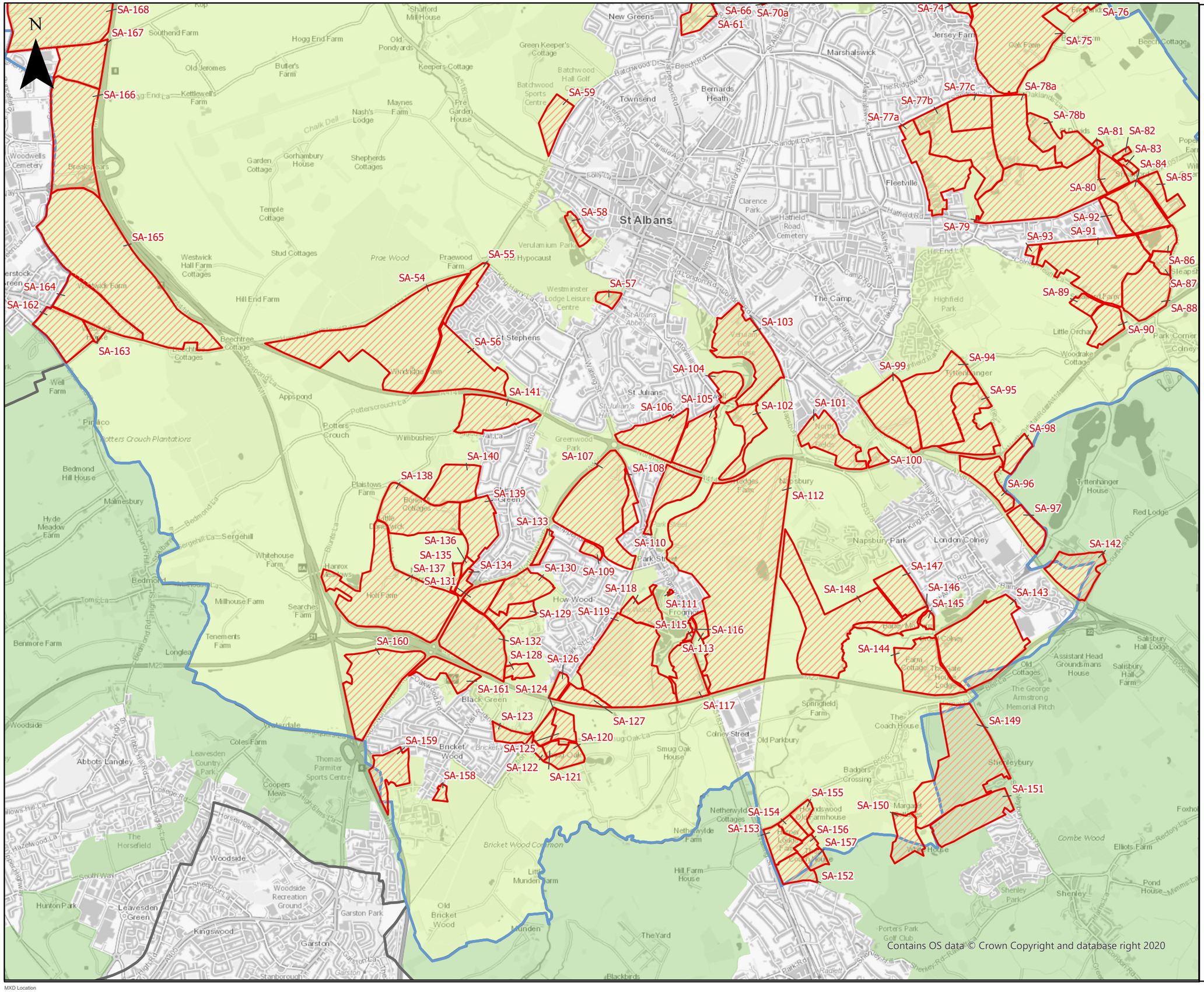

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- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt
- Sub-area for assessment

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Client

St Albans City & District Council

Job Title

St Albans Green Belt review

Figure 4.7 Sub-areas for assessment - south

Scale at A3

1:35,000

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001	**P3**

MXD Location

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4.4 Step 3: Site Visits

All sub-areas were visited to understand their immediate context, character and boundary features, and to refine initial desktop analysis. The site visit sought to gather information about the sub-areas to inform the assessment (as described in the following sections). All site visits were carried out in pairs and typically the visit entailed a walk along the sub-area perimeter to understand its relationship with the wider area. Sub-areas were also viewed from further afield, where they were visible from other public vantage points as this was crucial to understand relationships with built settings. Where sub-areas benefited from public access, the team walked through the sub-area.

Photographs of all sub-areas 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) for undertaking the written assessments. The photographs were used as an aide-memoir for assessors / illustrate context for readers rather than for assessment purposes per se. They were not used to determine the conclusions and recommendations for the sub-areas.

Findings from the site visits were recorded in pro-forma for each sub-area, including up to four photographs. Where access or limited views restricted the number of photographs for the sub-area, the pro forma was supplemented with an aerial photograph to provide additional context for readers.

4.5 Steps 4-6: Assessment of Sub-areas

The assessment process involved a mixture of evidence from desk-based research, including contextual information and secondary data sources such as aerial photography, Google Streetview, and historic maps. This was supported by primary evidence obtained through the site visits. The aim of the assessment was to establish any differentiation in terms of how sub-areas function and fulfil the purposes of the Green belt. The assessment of the sub-areas was undertaken in two steps:

- Assessment against the NPPF purposes; and
- Appraisal of role and importance of the sub-area in terms of the function of the wider Green Belt, (taking into consideration strategic land parcel scores from the Stage 1 GBR).

4.5.1 Step 4: Purpose Assessment

As per the Stage 1 GBR, each sub-area was assessed against the same NPPF purposes, i.e. 1-4:

1. To check the unrestricted sprawl of the large built-up areas.
2. To prevent neighbouring towns merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.

Assessment against NPPF purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land was excluded. Assessment against this purpose would not enable a distinction between sub-areas as all Green Belt achieves the purpose. It is difficult to distinguish the individual contribution that a single parcel of land makes to encouraging the re-use of urban land.

One or more criteria were developed for each purpose using both qualitative and quantitative measures, and a score out of five attributed to each criterion (Table 4.3). Each NPPF purpose was considered equally significantly, and therefore no weighting or aggregation of scores across the purposes was undertaken. As such, a composite judgement was necessary to determine where, overall, Green Belt sub-areas are meeting Green Belt purposes strongly or weakly.

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

It should be noted that the Stage 1 GBR uses a three-tier classification system to summarise the assessment against each purpose (significant contribution, partial contribution, and limited or no contribution to GB purpose). To reflect the finer grain assessment undertaken at Stage 2 GBR, the classification system has been extended to five-tier levels of scoring to allow for a great differentiation is assessment. The five-tier scoring works within the same scale of measuring the performance against the purpose, from strongly performing to weakly performing. In both reviews, supporting text explains how the classification has determined.

Purpose 1

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

The Stage 1 GBR identified the large built-up areas as London, Luton, Dunstable and Stevenage, on the basis that preventing the sprawl of these areas was the main reason for the creation of Hertfordshire and Bedfordshire Green Belts. While this was appropriate for a strategic study, for this finer grained assessment, the purpose 1 criteria were applied in relation to settlements within St Albans and its neighbouring authorities (Table 4.4).

Table 4.4 Large Built-up Areas Used for the Purpose 1 Assessment

St Albans Large Built-Up Areas[27]	Neighbouring Local Authorities Large Built-Up Area[28]
St Albans **Harpenden**	Luton and Dunstable (Luton/ Central Bedfordshire) Hemel Hempstead (Dacorum) Watford (Watford) Hatfield (Welwyn Hatfield) Welwyn Garden City (Welwyn Hatfield)

Purpose 1 Criterion (a)

Criterion (a) considered a ‘yes/no’ basis, whether the Green Belt sub-area protects open land at the edge of one of more distinct large built-up area(s). Reflecting the more granular scale of the Stage 2 GBR compared with the Stage 1 GBR, some sub-areas may not physically abut a large built-up area but may be visually or functionally linked to it. Therefore, judgement of whether a sub-area is at the

[27] 1st tier settlements as defined in the Stage 1 GBR

[28] Only immediately adjacent large built-up areas considered in this assessment, other large built-up areas (as identified in their respective Stage 2 Green Belt reviews) within neighbouring authorities considered too distant or separated from St Albans by other settlements. Discounted settlements: Borehamwood (Hertsmere), Berkhamsted and Tring (Dacorum), Hitchin and Letchworth (North Hertfordshire), Rickmansworth, Chorleywood, Northwood and Croxley Green (Three Rivers).

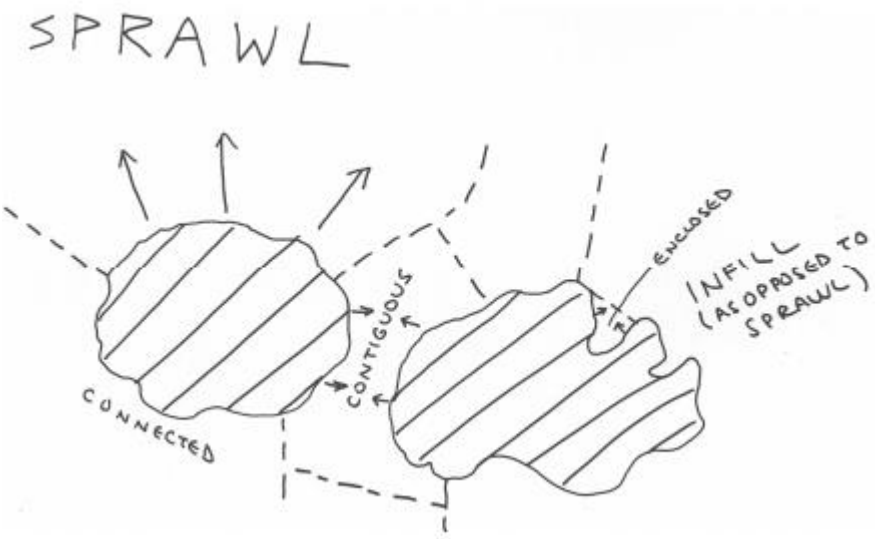
edge of a large built-up area was taken on a flexible basis utilising professional judgement. Any sub-area that categorised as a 'no' for criterion (a), was automatically scored zero for criterion (b).

Purpose 1 Criterion (b)

Green Belt should function to protect open land at the edge of large built-up areas. However, the extent to which a sub-area prevents sprawl is dependent on:

- Its relationship with adjacent built-up area(s), in particular the degree / nature of containment by built form. Sub-areas that are almost entirely surrounded by built development as part of a single built-up area (enclosed) do not prevent sprawl, rather potential development could be classified as infill (Figure 4.8). Whereas sub-areas between two built-up areas (contiguous) or on the edge of a built-up area (connected) have a role in preventing sprawl.
- Degree of openness, i.e., the extent to which a sub-area already contains built development. If the sub-area is fully developed, it does not meet the basic aim of Green Belt (NPPF paragraph 137).

Figure 4.8 Illustration of Connected, Contiguous and Enclosed



- Linkages to the wider Green Belt, including the presence of prominent man-made or natural physical features that might restrict the scale of outward growth (both in physical and perceptual terms) and regularise potential development form.
- Extent to which the edge of the built-up area has a defensible, i.e. strongly defined regular or consistent, and durable boundary. Where the built edge is predominantly irregular or comprised of less durable features, the Green Belt plays an important role in preventing sprawl. Where the built-up area edge is predominantly regular or comprised of durable features, the Green Belt is an additional barrier to sprawl. Examples of (ir-)regular features are set out in Table 4.5.

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.

Purpose 2

To prevent neighbouring towns merging into one another

As per NPPF paragraph 138(b), Green Belt Purpose 2 is concerned with the prevention of neighbouring towns from merging into one another. Reflecting experience elsewhere, the use of the terms 'towns' is applied slightly differently in the Stage 1 and Stage 2 GBR.

The Stage 1 GBR assessed the extent to which strategic land parcels serve as gaps or spaces between settlements, focussing on gaps between tier 1 settlements, referred to as 'towns' in a purpose 2 assessment. For the Stage 1 GBR, tier 1 settlements included St Albans, Harpenden, Hemel Hempstead, Hatfield, Welwyn Garden City, Watford, Luton and Dunstable and Radlett.

In light of the increased granularity of this study, the Stage 2 GBR considers both tier 1 and tier 2 settlements (Table 4.7), also referred to as 'towns' in a purpose 2 assessment. The defined towns included tier 1 and 2 settlements within SADC area itself and neighbouring authorities' settlements adjacent to St Albans' boundaries.

Table 4.7 Settlements for Purpose 2 Assessment

St Albans Settlements	Neighbouring Local Authority Settlements
St Albans **Harpenden**	Luton and Dunstable (Luton/ Central Bedfordshire) Slip End (Central Bedfordshire) Hemel Hempstead (Dacorum) Kings Langley (Dacorum) Markyate (Dacorum) Abbots Langley (Three Rivers) Watford (Watford) Radlett (Hertsmere) Hatfield (Welwyn Hatfield) Welwyn Garden City (Welwyn Hatfield) Welham Green (Welwyn Hatfield)
Bricket Wood **Chiswell Green** **How Wood** **London Colney** **Park Street / Frogmore** **Redbourn** **Wheathampstead**	

The purpose 2 criterion considers the extent to which sub-areas protects a valued gap in the built-form and preventing towns from merging through sprawl or ribbon development. The assessment was based on the following definitions:

- 'Essential' gaps, where development would significantly reduce the perceived or actual distance between settlements.
- 'Gaps', or part of a gap, where limited development may be possible without coalescence between settlements.
- 'Less essential' gap, or less essential part of a gap, where development is likely to be possible without any risk of coalescence between settlements.

Our analysis also noted the identified Strategic Gaps from Stage 1, those relevance to St Albans being:

- St Albans – Hemel Hempstead
- St Albans – Harpenden
- St Albans - Welwyn Garden City
- St Albans – Hatfield
- Harpenden – Hemel Hempstead

- Harpenden – Luton / Dunstable
- Harpenden – Welwyn Garden City

This assessment considered the openness of the Green Belt, in terms of whether it can physically or visually accommodate growth without fundamentally compromising the gaps between settlements. In determining the extent to which a gap prevents coalescence, various factors were taken into consideration including distance, natural or man-made barriers and topography.

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.

Purpose 3

To assist in safeguarding the countryside from encroachment

The Stage 1 approach to purpose 3 considered the extent to which Green Belt has maintained the openness and character of the countryside and conversely resisted urbanising influences. The interpretation of purpose 3 for this study has developed along similar lines – it considered openness (in terms of extent of existing built development which may encroach on the sense of spatial and visual openness due to urbanising influences) and the degree to which the Green Belt can be characterised as countryside. A sub-area's performance was judged based on the built form percentage and a qualitative assessment of countryside character from site visits, including the sense of openness and containment from neighbouring urbanising influences.

The percentage of built form within a Green Belt sub-area was calculated using GIS tools based on the land area of manmade (constructed) features as classified within the Ordnance Survey MasterMap data. This data includes buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures but excludes roads and railway lines.

The term 'countryside' is considered a policy designation used in national and local planning policy. It is typically used to refer to land beyond a defined settlement boundary and which does not comprise built development. For purpose 3, the assessment considered the degree to which the countryside within a sub-area can be characterised as having a rural (as opposed to urban) character. The judgement considered land uses (including agricultural use), morphology (shape and scale), context, land management (in particular, the presence of urban managed parks), topography and landform, and links to the wider Green Belt. The following categorisation of sub-area character were used:

- 'Strong unspoilt rural character' - land characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.

- ‘Largely rural character’ - land largely characterised by rural land uses and landscapes but with some dispersed development and man-made structures.
- ‘Semi-urban character’ - land that begins on the edge of the fully built-up area and contains a mixture of urban and rural land uses. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
- ‘Urban character’ - land that is dominated by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

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.

Purpose 4

To preserve the setting and special character of historic towns

Purpose 4 considers the extent to which a sub-area protects land in the immediate and wider context of a historic town. Two aspects are of particular importance with regard to assessment of Green Belt against purpose 4:

- The role of the sub-area in providing immediate context for the historic town, either by close proximity or physical overlapping; and
- Contribution to views or vistas between the historic town and the sub-area, looking both inwards and outwards where public viewpoints exist.

The settlements of St Albans and Harpenden were identified as being of relevance to this assessment, as the only two towns within the adopted settlement hierarchy. While it is recognised that there are historic villages with clear relationship with surrounding Green Belt, purpose 4 relates to higher order settlements.

In line with the Stage 1 GBR, a historic town was defined as a settlement or place with historic features identified in local policy or through conservation area or other historic designation. As with many settlements today, only parts of St Albans and Harpenden are considered historic. Thus, the defined Conservation Areas for St Albans and Harpenden, were used in the application of the assessment criteria.

Following this definition, the Conservation Areas of Harpenden and St Albans were included as historic places to be assessed against purpose 4.

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.

Local Purpose

The Stage 1 GBR also assessed the strategic land parcels against a local purpose, namely maintaining the existing settlement pattern. The Stage 1 GBR mirrored its approach to the purpose 2 assessment for this local purpose assessment however focused on non-1st tier settlements (rather than 1st tier settlements as for the purpose 2 assessment).

Given the more granular nature of this Stage 2 assessment and therefore the more spatially fine-grained assessment for purpose 2, this local purpose assessment was not carried out as it would largely replicate the same analysis for the Stage 2 purpose 2 assessment.

Overall Performance

Overall performance against the purpose assessment criteria was determined as follows:

- Any sub-area scoring strongly or very strongly (4 or 5) against the criteria for one or more NPPF purpose was judged to meet the purpose assessment criteria **strongly**.
- Any sub-area scoring moderately (3) against at least one NPPF purpose and failing to score strongly or very strongly (4 or 5) against any purpose was judged as meeting the purpose assessment criteria **moderately**.
- Any sub-area scoring weakly or very weakly (1 or 2) across all NPPF purposes was judged to meet the purpose assessment criteria **weakly**.

4.5.2 Step 5: Wider Green Belt Impact Assessment

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.

4.5.3 Step 6: Consideration of Boundaries

This section of the pro forma was for information only. For each sub-area, if it were to be released from the Green Belt, commentary was provided on the resulting impact on the strength of its inner and outer Green Belt boundaries.

The strength of inner and outer sub-area boundaries were classified under one of three categories:

- Readily recognisable and likely to be permanent;
- Readily recognisable but not necessarily permanent; or
- Not readily recognisable or necessarily permanent.

This categorisation is guided by the NPPF paragraph 143(f) definition. Boundary features which qualify as 'readily recognisable and likely to be permanent' are detailed at section 4.3.

It also flagged where it might be necessary to secure mitigation to strengthen currently weak boundaries or to provide new boundaries if the sub-area was to be released.

While the requirement for mitigation is noted in the 'Categorisation and Recommendations' pro forma section (step 7), the decision on whether to strengthen existing boundaries, or create new boundaries will be for the Council to make, including how such mitigation might be secured.

4.6 Step 7: Categorisation and Recommendations

Following the assessment of the sub-areas against the NPPF purposes and assessment of the impacts on the wider strategic Green Belt, each sub-area was categorised as shown in Table 4.4. The categorisation identified which sub-areas should be retained within the Green Belt; and the sub-area, combination of sub-areas, or part of sub-area recommended for further consideration. Each recommended area for further consideration was assigned a unique reference number. It should be noted that recommended areas (ha) may not correspond with the area (ha) of the sub-area being assessed; this is as only part of the sub-area could be recommended, the sub-area could be recommended in combination with another sub-area(s), or the sub-area could be recommended in combination with small additional pieces of Green Belt land (e.g. a road that separates SA-x and SA-y).

The categorisation process recognises the potential existence of sub-areas, which meet one or more of the Green Belt purposes strongly but that overall make a lesser contribution to the purposes when compared with the wider Green Belt Parcel in which they lie; or where, if removed from the Green Belt, it is unlikely that there would be harm upon the function or integrity of the surrounding Green Belt Parcel(s) or sub-area(s). Conversely, it also reflects the possibility for sub-areas which meet the purpose Assessment Criteria weakly but that are integral to maintaining the protection or integrity of the surrounding Green Belt.

Table 4.11 Sub-area Categorisation / Recommendations

Meets purpose assessment criteria	Contribution to wider strategic green belt	Recommendation
Strongly	Important	Not recommended for further consideration
	Less important	Recommended for further consideration
	Part of sub-area less important	Part recommended for future consideration
Moderately	Important	Not recommended for further consideration
	Less important	Recommended for further consideration
	Part of sub-area less important	Part recommended for future consideration
Weakly	Important	Not recommended for further consideration
	Les important	Recommended for further consideration
	Part of sub-area less important	Recommended for further consideration

Washed Over Village Assessment

4.7 Step 1: Washed Over Village Identification

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 thus the Local Plan settlement hierarchy (Table 4.12), which identifies Green Belt settlements as the smaller villages located within the Green Belt.

These Green Belt settlements are considered to be more sizable settlements in locations that make an important contribution to Green Belt functions. As set out in the current Local Plan, development here is limited to small scale infilling and redevelopment of previously developed land that reflects the Green Belt context and open character of the area. The location of these villages is shown on Figure 4.9.

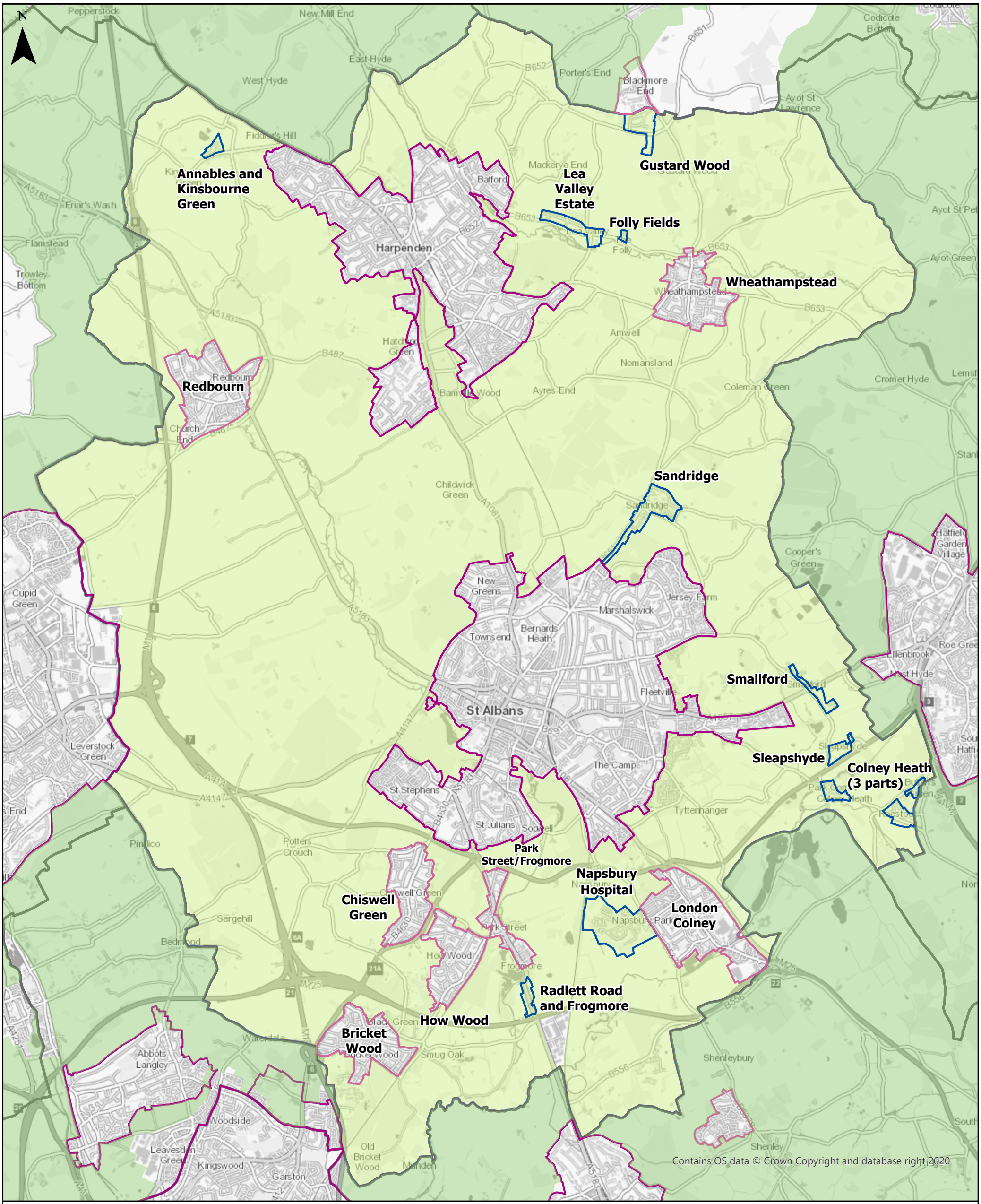
In addition, at the Council's request, development at the former Napsbury Hospital site was considered as a potential washed over village. The location of this potential village is also show on Figure 4.9

Table 4.12 Settlement Hierarchy

Settlement Tier	Settlement
1st tier Towns	St Albans, Harpenden
2nd tier Specified settlements excluded from the Green Belt	Bricket Wood Chiswell Green How Wood London Colney Park Street / Frogmore Redbourn Wheathampstead
3rd tier Green Belt settlements	Annables and Kinsbourne Green Colney Heath Folly Fields Gustard Wood Lea Valley Estate Radlett Road and Frogmore Sandridge Sleapshyde Smallford

Source: City and District of St Albans (1994) District Local Plan Review

A3



Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt
- Towns
- Specified Settlements
- Washed Over Villages

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Figure 4.9 St Albans Settlement Hierarchy

Scale at A3
1:55,000

Job No	Drawing Status
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MXD Location

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4.8 Step 2: Defining Village Boundaries

The purpose of this step was to define village boundaries for the purpose of the assessment. 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.

4.9 Step 3: Site Visits

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).

4.10 Step 4: Washed Over Village Assessment

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. The key documents and data sources used were:

Documents

- The Landscape Partnership (2000-2005) Hertfordshire Landscape Character Area Statements- St Albans District;
- St Albans City and District Council (various dates) Conservation Area Character Statements
- Gary Grant (2012) Environmental Capacity of St Albans City and District: Defining a Sustainable Level of Development
- Land Use Consultants (2011) St Albans District Green Infrastructure Plan

GIS data

- Landscape Character Areas
- Heritage assets - archaeological sites and battlefields
- Conservation Areas
- Historic parks and gardens
- Key community facilities
- Smaller centres, parades and individual shops
- Green Belt
- Local Green Space
- Rights of way
- Road hierarchy
- Sustainability Appraisal data layers, where relevant.

The assessment is intended to determine if the village still meets the NPPF policy (paragraph 144) for continued inclusion within the Green Belt.

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

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.

The assessment criteria for the villages are introduced below, along with a three-point assessment scale – low, moderate and high. The criteria elements are not mutually exclusive, e.g. they do not 'cancel each other out'. The greater the positive representation, or, the greater the quality of each element the more each element contributes to the open character / openness of the Green Belt.

Open Character Assessment

The assessment of whether the village has an open character is focused on the settlement form and scale, including the general pattern of development, density, and building heights, as well as the presence / extent of gaps or open spaces. The criteria (Table 4.13) focus on the village itself and the open character was assessed from within the village, either at the centre point of the village, or at a number of key locations within the village (dependent on size and variation of character). Professional judgement was applied in determining whether the village has an open character.

Table 4.13 Village Open Character Assessment Criteria

Element	Rationale and discussion
Settlement form and scale	This includes settlement characteristics important to an understanding of the settlement's identity, e.g. form – whether nucleated, linear or dispersed - urban form, density, extent of developed land, gaps, relationship to the wider landscape, presence of prominent or naturalistic features and skylines.
Key open spaces	These are open spaces important to the form and structure of the village, including the contribution they make to character.

Contribution to Openness of the Green Belt Assessment

As set out in Section 2 and Appendix A2, 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. The assessment was undertaken from the edge of the village and outside of the village (for example, on key approaches into the village). The criteria focus on significant built form, edge settings / interfaces and key views (Table 4.14).

In determining whether the open character of the village makes an 'important contribution' to the openness of the green belt, a majority based approach will be applied whereby if the majority of the criteria are assessed as high or moderate, then the village is considered to make an important contribution. If the majority of the criteria are assessed as low, then the village is not considered to make an important contribution. If there is an equal split between the criteria then professional

judgement should be applied in determining whether the village makes an 'important contribution' to the openness of the greenbelt.

Table 4.14 Contribution to the Openness of the Green Belt Assessment Criteria

Element	Rationale and discussion
Key views to/from settlement	Visual considerations will include topography, character, extent, level to which views are experienced by users, and values associated with views, where information is available. This category will also include intervisibility (e.g. visibility between landmarks and areas, or views in and out of the settlement), elevation and long views to key landmarks e.g. St Albans Cathedral.
Settlement edge characteristics and setting	This considers relationship to landscape, topography and physical features, age, character, edge conditions, quality and level of integration between the settlement and the wider landscape, as appropriate. This also includes a sense of porosity; how key green spaces (e.g. village greens), link directly to the wider landscape.

Assessment Scale

For each of the elements in the above tables, village open character assessment criteria (Table 4.13) and contribution to the openness of the green belt assessment criteria (Table 4.14), a sensitivity scale was used to attribute high, moderate or low scores (Table 4.15).

Table 4.15 Assessment Scale

Element	Assessment Scale (Degree of Contribution)		
	Low	Moderate	High
Open Character of the settlement			
Settlement form and scale	Expanded settlement with little relationship to original settlement core or otherwise little sense of traditional form.	Settlement may be formed from a combination of traditional and eroded/expanded structural elements.	Small, scale traditional, settlements of compact nucleated, linear, loose or dispersed character and traditional/historic pattern, with strong relationship between settlement and immediate landscape.
Key open spaces	Few or no green space within the village boundary. Likely to have poor degree of intervisibility and legibility with other parts of the village/hamlet.	Some areas of green space within the village boundary. Likely to have moderate degree of intervisibility and legibility with other parts of the village/hamlet.	Prominent green spaces within the village boundary – greens/commons etc. Likely to have strong intervisibility and legibility with other parts of the village/hamlet and potentially also the wider landscape.
Contribution to Openness of the Green Belt			
Key views to/from settlement	Views to/from the wider landscape or through the development or are limited by built development or topography. Intervisibility with the wider countryside is low.	Views to/from the wider landscape or through the development are either partially open but limited by a mixture of natural vegetation or by built development or topography. Intervisibility with the wider countryside is moderate.	Views to/from the wider landscape or through the development are either open or partially limited natural vegetation. Intervisibility with the wider countryside is high.
Settlement edge characteristics and setting	Exterior settlement boundaries are largely made up of dense, often unbroken, visually prominent, man-made boundary features. The boundaries remove the relationship between the edge of the settlement and the wider landscape	Exterior settlement boundaries are moderately intact, partially visually permeable or have a mixture of natural and man-made elements. The boundaries allow a moderate relationship between the edge of the settlement and the wider landscape.	Exterior settlement boundaries are generally open, exposing built form of the settlement to the wider countryside. Boundary features which exist are intermittent, visually permeable or low level and with natural materials and an appropriate rural character. The boundaries allow a strong relationship between the edge of the settlement and the wider landscape.

4.11 Step 5: 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.

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

Where it is recommended that the villages are excluded from the Green Belt, the study considered potential future inset boundaries of the villages. Based on the NPPF (paragraphs 143 and 144), the following criteria were used to determine the new inset boundaries:

- Does the inset village include all land, which it is unnecessary to keep permanently open?
- Is the boundary based on physical features that are readily recognisable and likely to be permanent? The defined boundaries were consistent with the approach set out in section 4.3.2.

5. Green Belt Key Findings

5.1 Introduction

This section summarises the key findings from the assessment of the 183 sub-areas against the NPPF purposes, consideration of the role of the sub-areas as part of the wider strategic Green Belt, consideration of boundaries and categorisation and recommendations for each sub-area. The detailed pro-formas setting out the assessments for each sub-area can be found in the Annex Report.

5.2 Purpose 1

Purpose 1: To check the unrestricted sprawl of large built-up areas

5.2.1 Criteria (a) Assessment

The findings of the purpose 1 criteria a assessment are presented in Table 5.1 and Figures 5.1 and 5.2. Of the 182 sub-area assessed, 62 score 'Yes' against purpose 1 criteria (a) meaning that they are located at the edge of a large built-up area. The remaining 120 sub-areas score 'No' as they are not located at the edge of a large built-up area.

5.2.2 Criteria (b) Assessment

The findings of the purpose 1 criteria b assessment are presented in Table 5.2 and Figures 5.3 and 5.4. A total of 120 sub-areas scored 'No' against purpose 1 criteria (a) and hence automatically scored 0 against criteria (b). In addition, sub-areas that lie adjacent to a large built-up area that are fully developed also received this score. Of the remaining sub-areas that did meet criteria (b), 43 performed strongly, meaning that the sub-areas play an important role in preventing outward, irregular spread of a large built-up area. In addition, five sub-areas performed moderately, and 11 sub-areas performed weakly against this purpose.

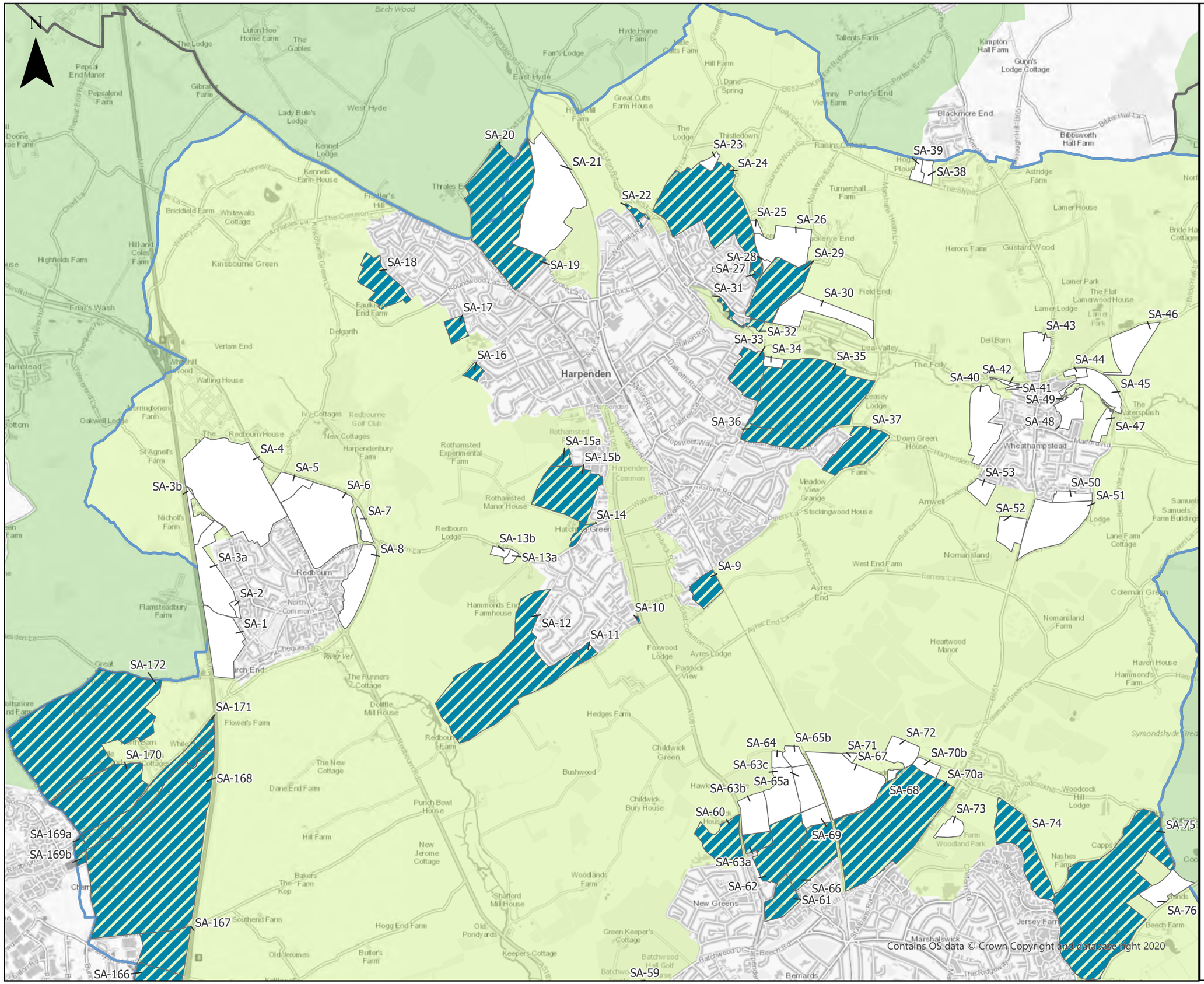
Table 5.1 Criteria (a) Summary of Scores

Criteria a Score	Number of Sub-areas	Sub-areas				
Yes	62	SA-10	SA-27	SA-60	SA-84	SA-164
		SA-11	SA-29	SA-61	SA-9	SA-165
		SA-12	SA-31	SA-62	SA-91	SA-166
		SA-14	SA-32	SA-63a	SA-92	SA-167
		SA-15a	SA-33	SA-66	SA-93	SA-168
		SA-15b	SA-35	SA-70a	SA-99	SA-169a
		SA-16	SA-36	SA-74	SA-101	SA-169b
		SA-17	SA-37	SA-75	SA-103	SA-170
		SA-18	SA-55	SA-77a	SA-104	SA-171
		SA-19	SA-56	SA-77b	SA-105	SA-172
		SA-20	SA-57	SA-77c	SA-106	
		SA-22	SA-58	SA-78a	SA-159	
		SA-24	SA-59	SA-79	SA-162	
No	120	SA-1	SA-47	SA-83	SA-118	SA-141
		SA-2	SA-48	SA-85	SA-119	SA-142
		SA-4	SA-49	SA-86	SA-120	SA-143
		SA-5	SA-50	SA-87	SA-121	SA-144
		SA-6	SA-51	SA-88	SA-122	SA-145
		SA-7	SA-52	SA-89	SA-123	SA-146
		SA-8	SA-53	SA-90	SA-124	SA-147
		SA-21	SA-54	SA-94	SA-125	SA-148
		SA-23	SA-63b	SA-95	SA-126	SA-149
		SA-25	SA-63c	SA-96	SA-127	SA-150
		SA-26	SA-64	SA-97	SA-128	SA-151
		SA-28	SA-65a	SA-98	SA-129	SA-152
		SA-30	SA-65b	SA-100	SA-130	SA-153
		SA-34	SA-67	SA-102	SA-131	SA-154
		SA-38	SA-68	SA-107	SA-132	SA-155
		SA-39	SA-69	SA-108	SA-133	SA-156
		SA-3a	SA-70b	SA-109	SA-134	SA-157
		SA-3b	SA-71	SA-110	SA-135	SA-158
		SA-40	SA-72	SA-111	SA-136	SA-160
		SA-41	SA-73	SA-112	SA-137	SA-161
		SA-42	SA-76	SA-113	SA-138	SA-163
		SA-43	SA-78b	SA-115	SA-139	
		SA-44	SA-80	SA-116	SA-13a	
		SA-45	SA-81	SA-117	SA-13b	
		SA-46	SA-82		SA-140	

Table 5.2 Criteria (b) Summary of Scores

Criteria b Score	Number of Sub-areas	Sub-areas				
5+	5	SA-15a	SA-78a	SA-91	SA-99	SA-169b
5	38	SA-9	SA-20	SA-55	SA-70a	SA-164
		SA-12	SA-22	SA-56	SA-74	SA-168
		SA-14	SA-24	SA-58	SA-75	SA-169a
		SA-15b	SA-29	SA-59	SA-79	SA-170
		SA-16	SA-32	SA-60	SA-92	SA-171
		SA-17	SA-35	SA-62	SA-105	SA-172
		SA-18	SA-36	SA-63a	SA-159	
		SA-19	SA-37	SA-66	SA-162	
3+	1	SA-167				
3	4	SA-101	SA-106	SA-165	SA-166	
1+	2	SA-10	SA-93			
1	9	SA-11	SA-33	SA-77a	SA-77c	SA-104
		SA-31	SA-61	SA-77b	SA-103	
0	123	SA-1	SA-44	SA-78b	SA-113	SA-139
		SA-2	SA-45	SA-80	SA-115	SA-140
		SA-3a	SA-46	SA-81	SA-116	SA-141
		SA-3b	SA-47	SA-82	SA-117	SA-142
		SA-4	SA-48	SA-83	SA-118	SA-143
		SA-5	SA-49	SA-84	SA-119	SA-144
		SA-6	SA-50	SA-85	SA-120	SA-145
		SA-7	SA-51	SA-86	SA-121	SA-146
		SA-8	SA-52	SA-87	SA-122	SA-147
		SA-13a	SA-53	SA-88	SA-123	SA-148
		SA-13b	SA-54	SA-89	SA-124	SA-149
		SA-21	SA-57	SA-90	SA-125	SA-150
		SA-23	SA-63b	SA-94	SA-126	SA-151
		SA-25	SA-63c	SA-95	SA-127	SA-152
		SA-26	SA-64	SA-96	SA-128	SA-153
		SA-27	SA-65a	SA-97	SA-129	SA-154
		SA-28	SA-65b	SA-98	SA-130	SA-155
		SA-30	SA-67	SA-100	SA-131	SA-156
		SA-34	SA-68	SA-102	SA-132	SA-157
		SA-38	SA-69	SA-107	SA-133	SA-158
		SA-39	SA-70b	SA-108	SA-134	SA-160
		SA-40	SA-71	SA-109	SA-135	SA-161
		SA-41	SA-72	SA-110	SA-136	SA-163
		SA-42	SA-73	SA-111	SA-137	
		SA-43	SA-76	SA-112	SA-138	

A3



Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

Purpose 1 criteria (a) scores

- No
- Yes

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Figure 5.1 Purpose 1 criteria (a) - North

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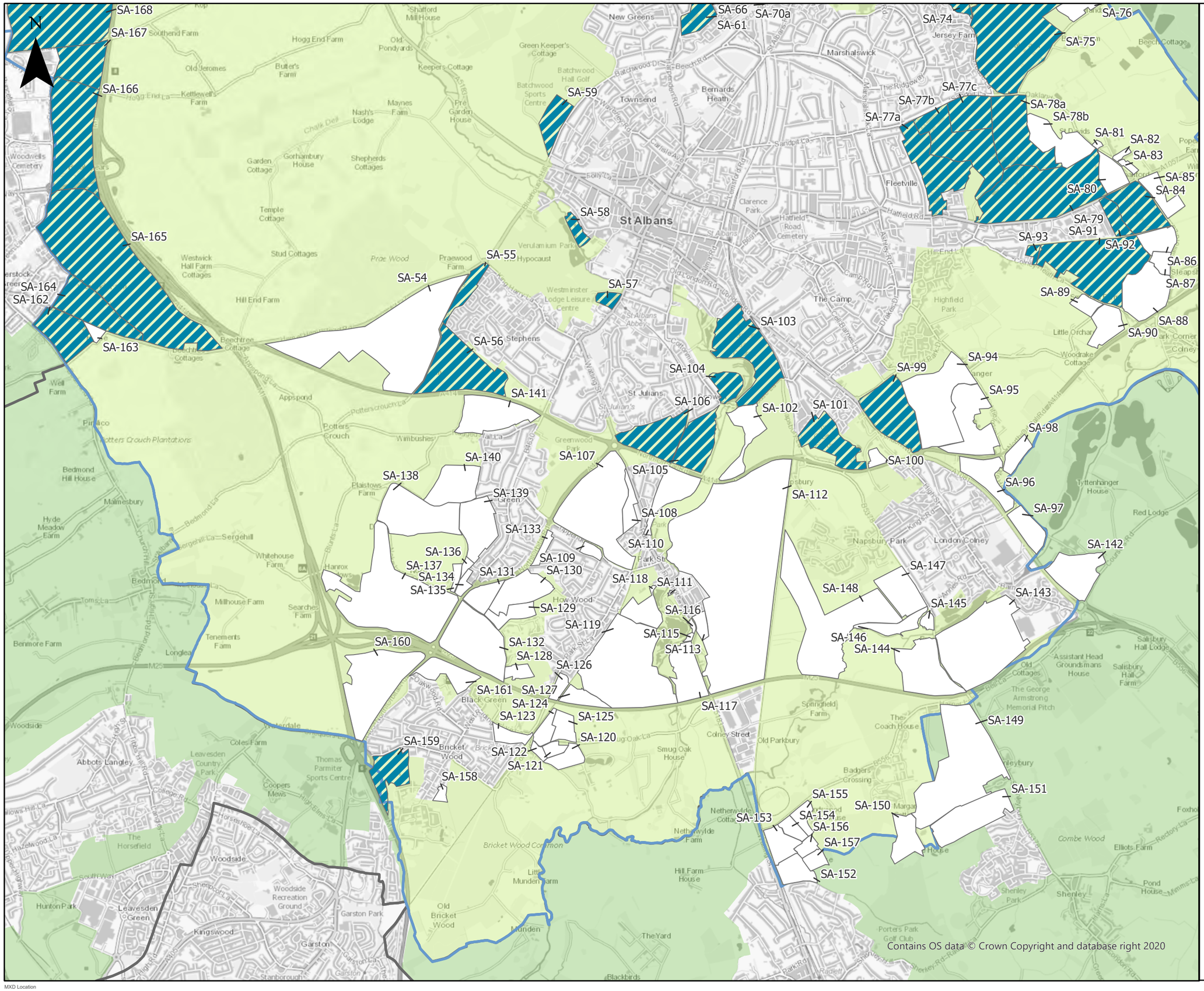

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- Neighbouring Green Belt

Purpose 1 criteria (a) scores

- No
- Yes

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Figure 5.2 Purpose 1 criteria (a) - South

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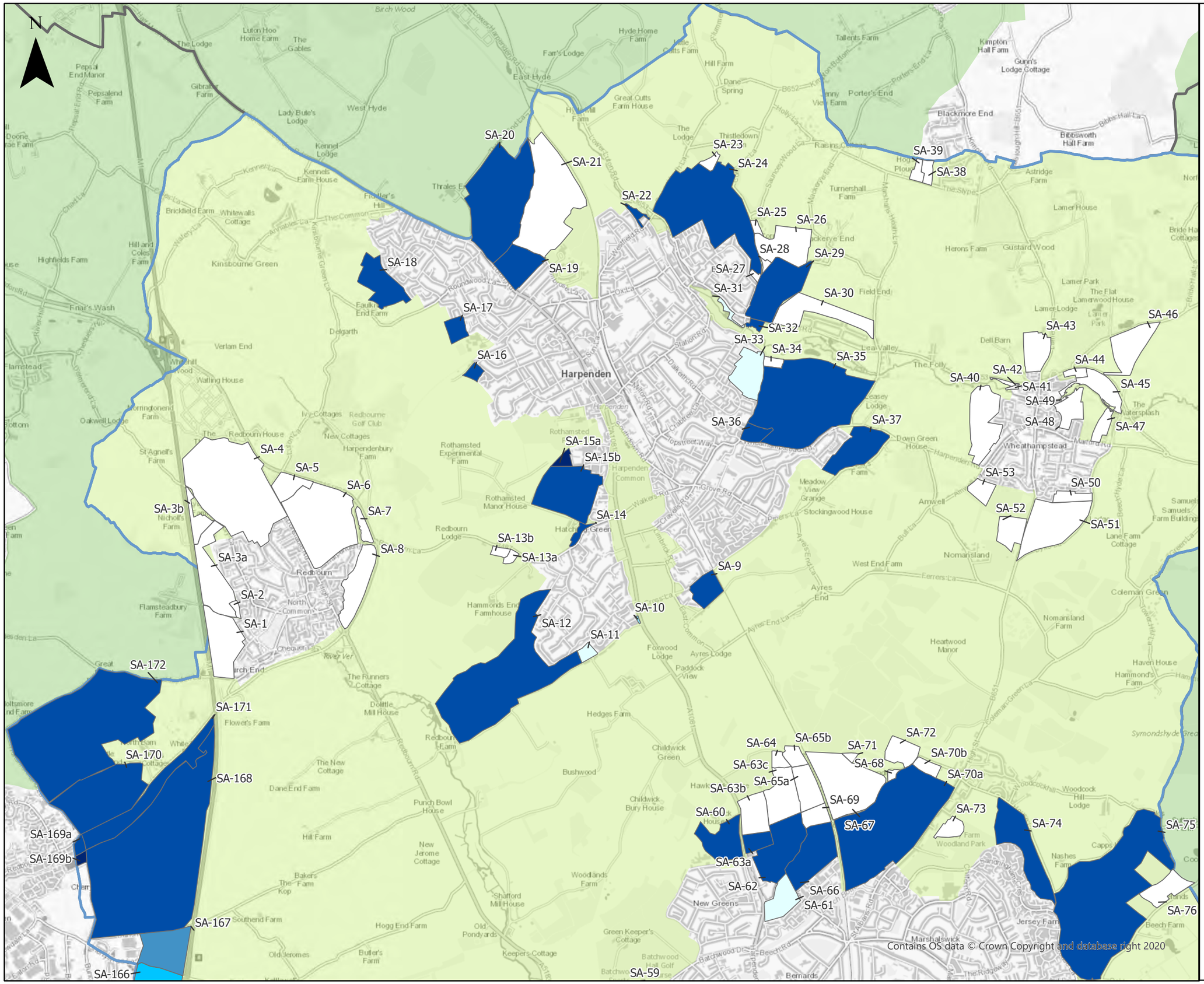

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- Neighbouring Green Belt

Purpose 1 criteria b scores

- 0
- 1
- 1+
- 3
- 3+
- 5
- 5+

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Figure 5.3 Purpose 1 criteria (b) - North

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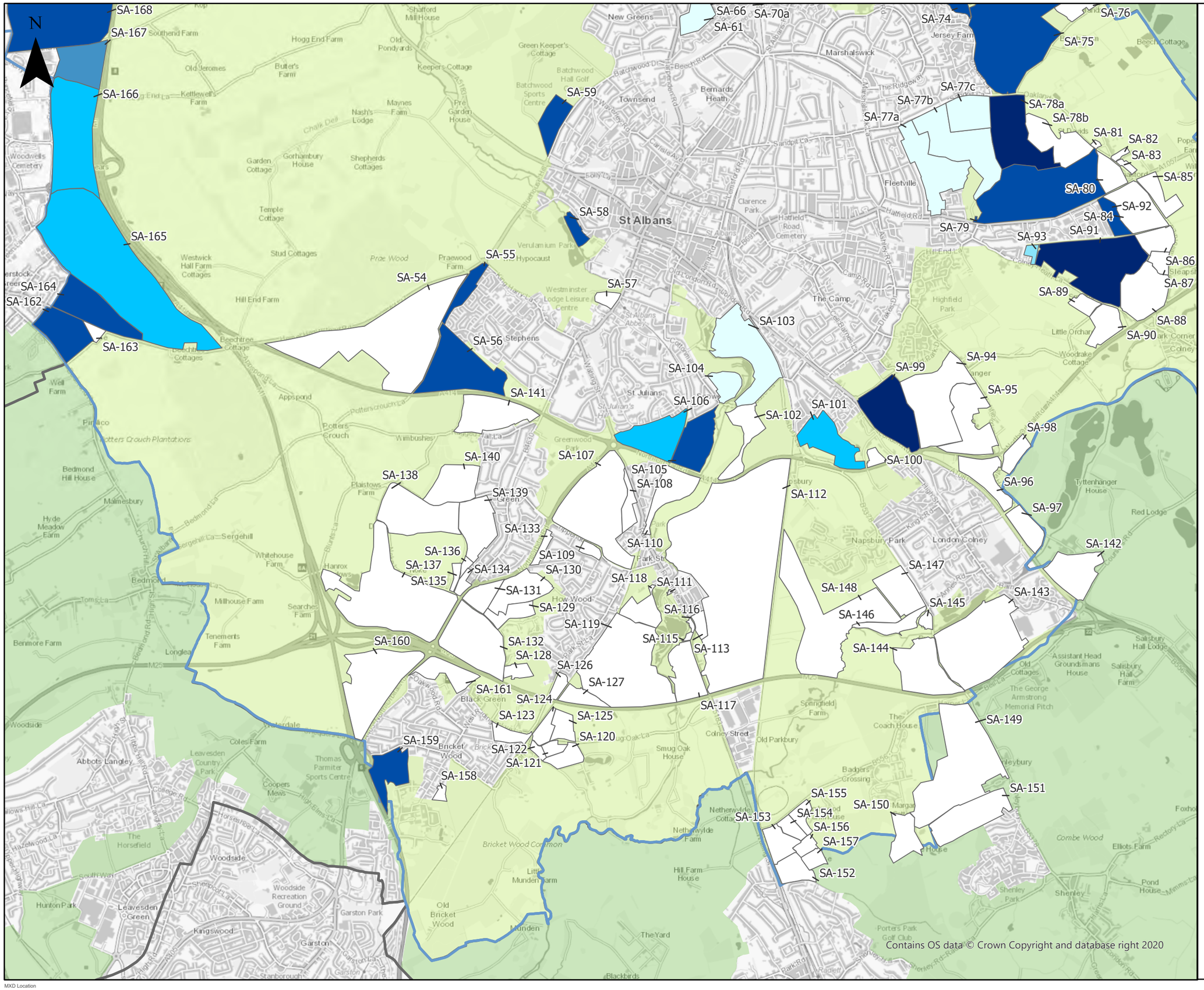

Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

Purpose 1 criteria b scores

- 0
- 1
- 1+
- 3
- 3+
- 5
- 5+

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Figure 5.4 Purpose 1 criteria (b) - South

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5.3 Purpose 2

Purpose 2: To prevent neighbouring towns from merging

The findings of the purpose 2 assessment are presented in Table 5.3 and Figures 5.5 and 5.6. The majority (90) of sub-areas perform weakly against purpose 2, forming a 'less essential' gap between settlements; a further 47 sub-areas do not meet this purpose, making no discernible contribution to preventing settlements from coalescing. In instances where a sub-area is already fully developed, the scale of the gap has been assessed to be diminished.

However, 33 sub-areas meet this purpose moderately, whilst 12 meet the purpose strongly as they form almost the entire gap between settlements and hence play an essential role in preventing settlements from merging.

Table 5.3 Purpose 2 Summary of Scores

Purpose 2 Score	Number of Sub-areas	Sub-areas					
5	12	SA-99	SA-106	SA-112	SA-129	SA-159	SA-171
		SA-105	SA-107	SA-118	SA-133	SA-168	SA-172
3	33	SA-12	SA-56	SA-95	SA-123	SA-143	SA-161
		SA-30	SA-75	SA-101	SA-124	SA-144	SA-165
		SA-35	SA-84	SA-117	SA-125	SA-148	SA-170
		SA-37	SA-85	SA-119	SA-132	SA-149	
		SA-40	SA-91	SA-121	SA-137	SA-150	
		SA-54	SA-94	SA-122	SA-141	SA-160	
1	90	SA-1	SA-20	SA-63b	SA-77c	SA-120	SA-155
		SA-3a	SA-21	SA-63c	SA-78a	SA-126	SA-156
		SA-3b	SA-24	SA-64	SA-78b	SA-127	SA-157
		SA-5	SA-29	SA-65a	SA-79	SA-128	SA-158
		SA-6	SA-32	SA-65b	SA-80	SA-131	SA-162
		SA-7	SA-33	SA-66	SA-86	SA-134	SA-164
		SA-8	SA-41	SA-67	SA-88	SA-135	SA-166
		SA-9	SA-42	SA-69	SA-90	SA-138	SA-167
		SA-13a	SA-45	SA-70a	SA-96	SA-139	SA-169a
		SA-13b	SA-50	SA-70b	SA-97	SA-140	SA-169b
		SA-14	SA-51	SA-72	SA-98	SA-142	
		SA-15a	SA-52	SA-73	SA-102	SA-146	
		SA-15b	SA-53	SA-74	SA-108	SA-147	
		SA-16	SA-60	SA-76	SA-109	SA-151	
		SA-17	SA-62	SA-77a	SA-110	SA-152	
		SA-18	SA-63a	SA-77b	SA-113	SA-154	
0	47	SA-2	SA-26	SA-43	SA-58	SA-87	SA-115
		SA-4	SA-27	SA-44	SA-59	SA-89	SA-116
		SA-10	SA-28	SA-46	SA-61	SA-92	SA-130
		SA-11	SA-31	SA-47	SA-68	SA-93	SA-136
		SA-19	SA-34	SA-48	SA-71	SA-100	SA-145
		SA-22	SA-36	SA-49	SA-81	SA-103	SA-153
		SA-23	SA-38	SA-55	SA-82	SA-104	SA-163
		SA-25	SA-39	SA-57	SA-83	SA-111	

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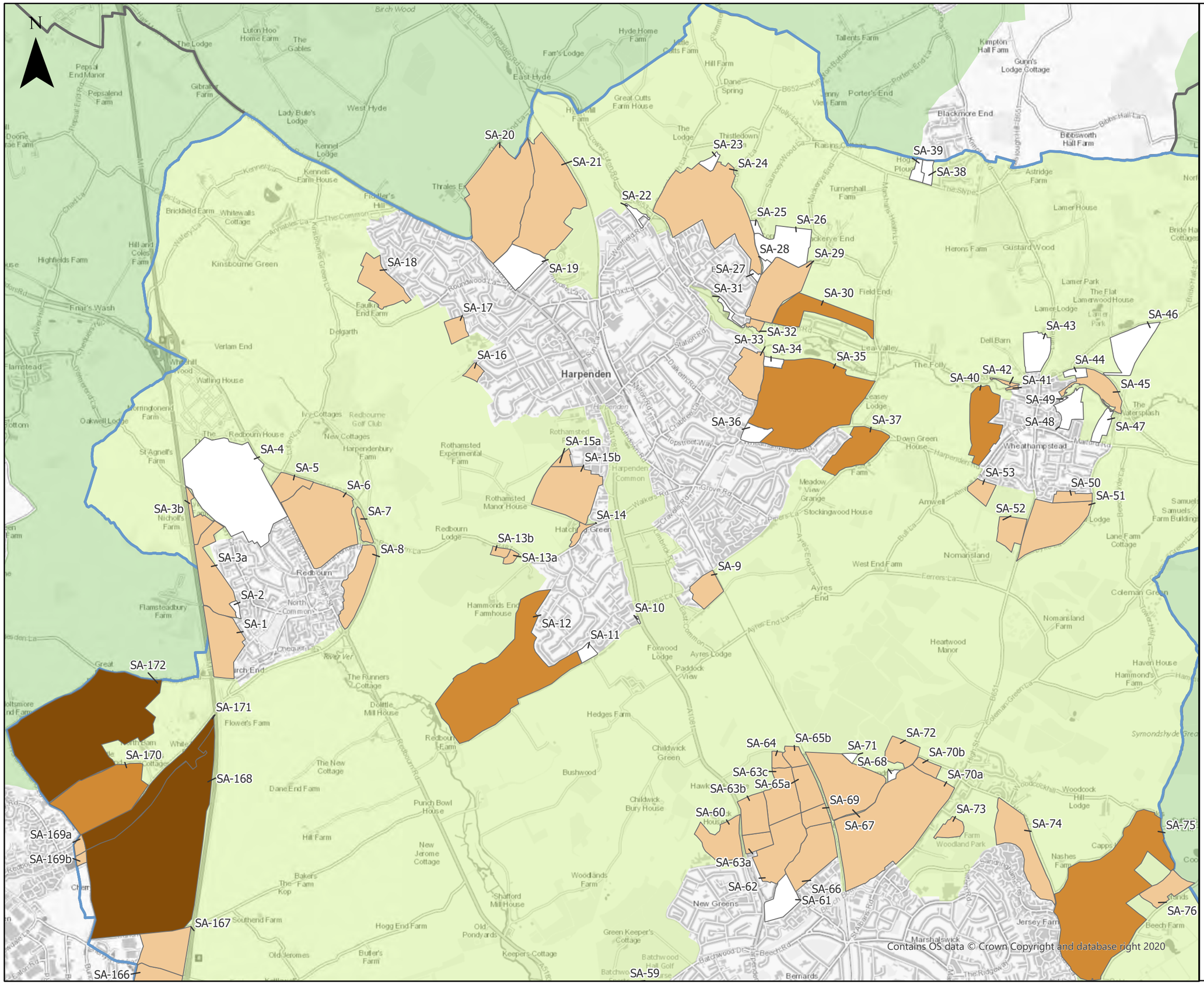

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- St Albans District Boundary
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- St Albans Green Belt
- Neighbouring Green Belt

Purpose 2 scores

- 0
- 1
- 3
- 5

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Figure 5.5 Purpose 2 - North

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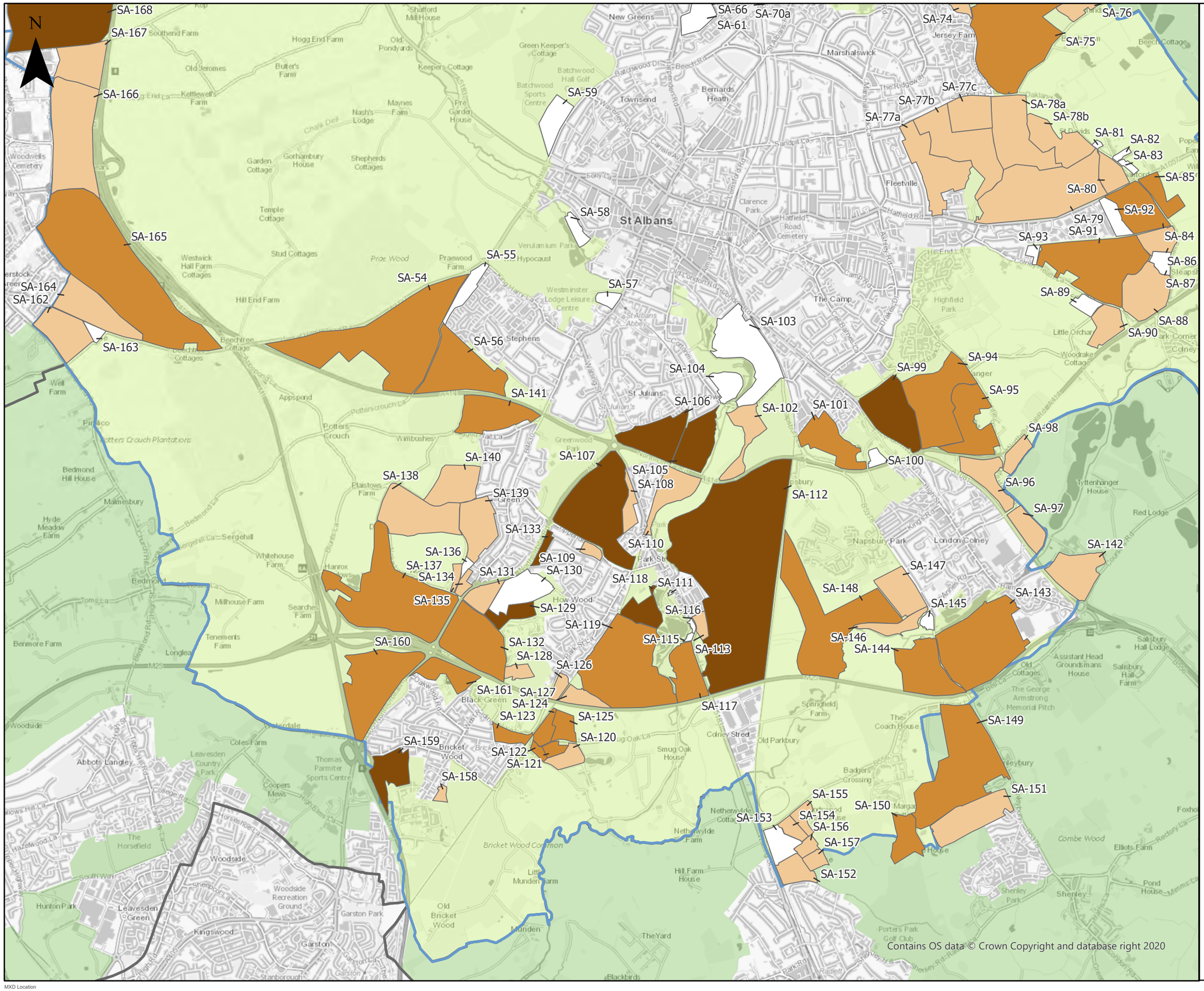

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- St Albans Green Belt
- Neighbouring Green Belt

Purpose 2 scores

- 0
- 1
- 3
- 5

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Figure 5.6 Purpose 2 - South

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5.4 Purpose 3

To assist in safeguarding the countryside from encroachment

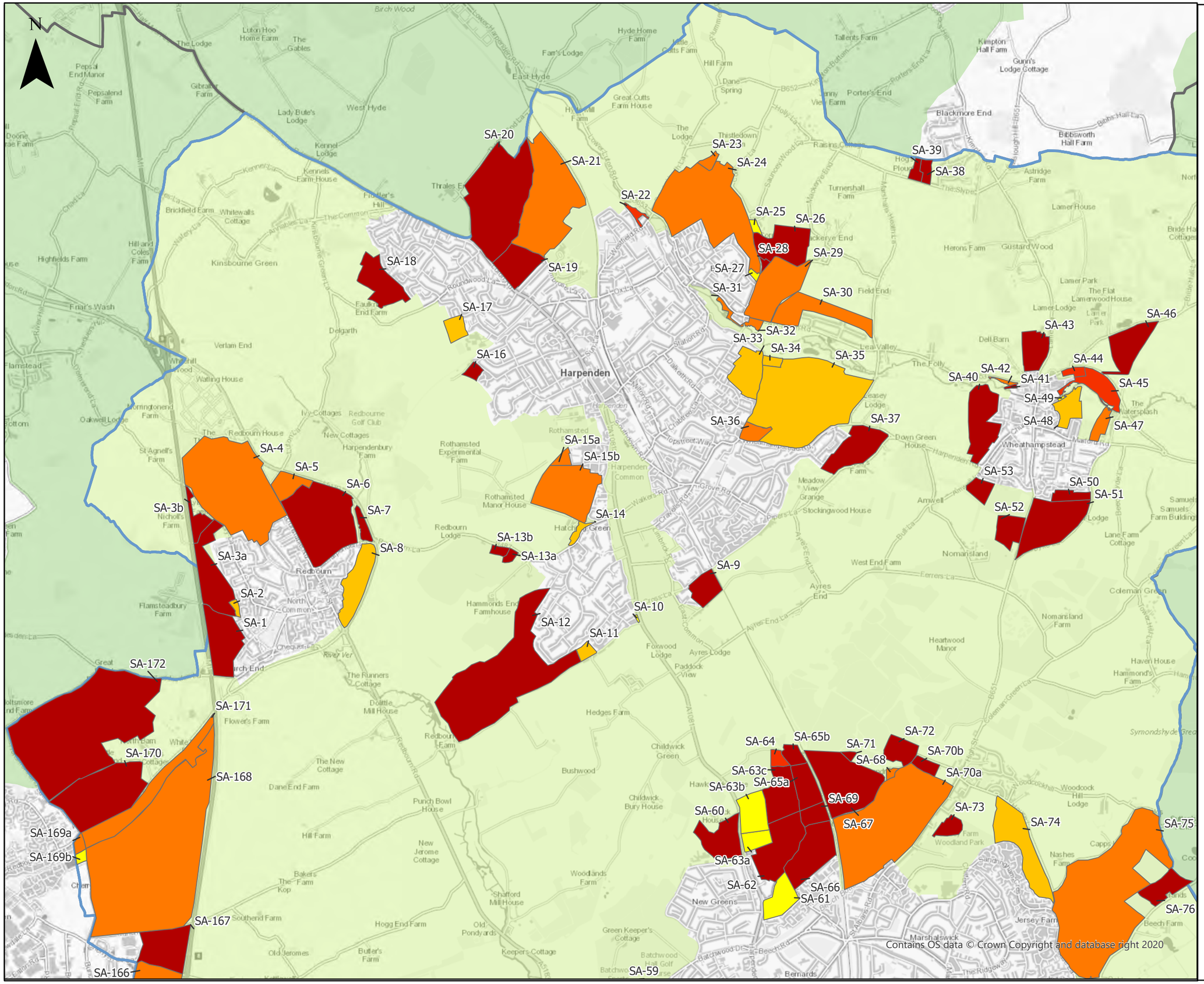
The findings of the Purpose 3 assessment are presented in Table 5.4 and Figures 5.7 and 5.8. The purpose 3 assessment considers the character of each sub-area, and the scores demonstrate the range of urban to rural characters present across the sub-areas. The largest proportion (86) of sub-areas were considered to perform strongly against purpose 3, demonstrating a 'strongly unspoilt rural' character; and therefore, play an important role in preventing encroachment into the countryside.

Forty-seven of the sub-areas meet the purpose moderately, demonstrating a 'largely rural character', with limited encroachment at the fringes or dispersed structures which do not overtly detract from a feeling of countryside. Twenty-two of the sub-areas were assessed as having a 'semi-urban character', and hence meet the purpose weakly. The remaining 27 sub-areas are considered to have an urban character, performing weakly against this purpose as they have been subject to physical encroachment and/or a reduction in their rural character.

Table 5.4 Purpose 3 Summary of Scores

Purpose 3 Score	Number of Sub-areas	Sub-areas					
5	78	SA-1	SA-37	SA-60	SA-77c	SA-118	SA-150
		SA-3a	SA-38	SA-62	SA-78b	SA-119	SA-151
		SA-3b	SA-39	SA-63c	SA-88	SA-121	SA-160
		SA-6	SA-40	SA-65a	SA-89	SA-125	SA-161
		SA-7	SA-41	SA-65b	SA-90	SA-126	SA-162
		SA-9	SA-43	SA-66	SA-91	SA-127	SA-164
		SA-12	SA-46	SA-67	SA-94	SA-137	SA-165
		SA-13a	SA-50	SA-69	SA-95	SA-140	SA-167
		SA-13b	SA-51	SA-70b	SA-96	SA-145	SA-170
		SA-16	SA-52	SA-71	SA-97	SA-146	SA-172
		SA-18	SA-53	SA-72	SA-98	SA-148	
		SA-20	SA-54	SA-73	SA-105	SA-149	
		SA-26	SA-56	SA-75	SA-108		
		SA-28	SA-59	SA-76	SA-112		
4	8	SA-22	SA-45	SA-64	SA-120		
		SA-44	SA-55	SA-110	SA-147		
3	47	SA-4	SA-30	SA-78a	SA-107	SA-142	SA-159
		SA-5	SA-31	SA-79	SA-109	SA-143	SA-166
		SA-15a	SA-32	SA-86	SA-123	SA-144	SA-168
		SA-15b	SA-36	SA-92	SA-124	SA-152	SA-169a
		SA-21	SA-42	SA-93	SA-131	SA-154	SA-171
		Sa-23	SA-47	SA-99	SA-132	SA-156	
		SA-24	SA-68	SA-102	SA-135	SA-157	
		SA-29	SA-70a	SA-106	SA-139	SA-158	
2	22	SA-2	SA-33	SA-80	SA-122	SA-136	
		SA-8	SA-34	SA-101	SA-128	SA-138	
		SA-11	SA-35	SA-104	SA-129		
		SA-14	SA-48	SA-113	SA-133		
		SA-17	SA-74	SA-117	SA-134		
1	18	SA-10	SA-58	SA-77a	SA-85	SA-155	
		SA-25	SA-61	SA-77b	SA-103	SA-169b	
		SA-27	SA-63a	SA-81	SA-115		
		SA-49	SA-63b	SA-83	SA-116		
0	9	SA-57	SA-84	SA-100	SA-130	SA-163	
		SA-82	SA-87	SA-111	SA-153		

A3



Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

Purpose 3 scores

- 0
- 1
- 2
- 3
- 4
- 5

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Figure 5.7 Purpose 3 - North

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- St Albans District Boundary
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- St Albans Green Belt
- Neighbouring Green Belt

Purpose 3 scores

- 0
- 1
- 2
- 3
- 4
- 5

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Figure 5.8 Purpose 3 - South

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5.5 Purpose 4

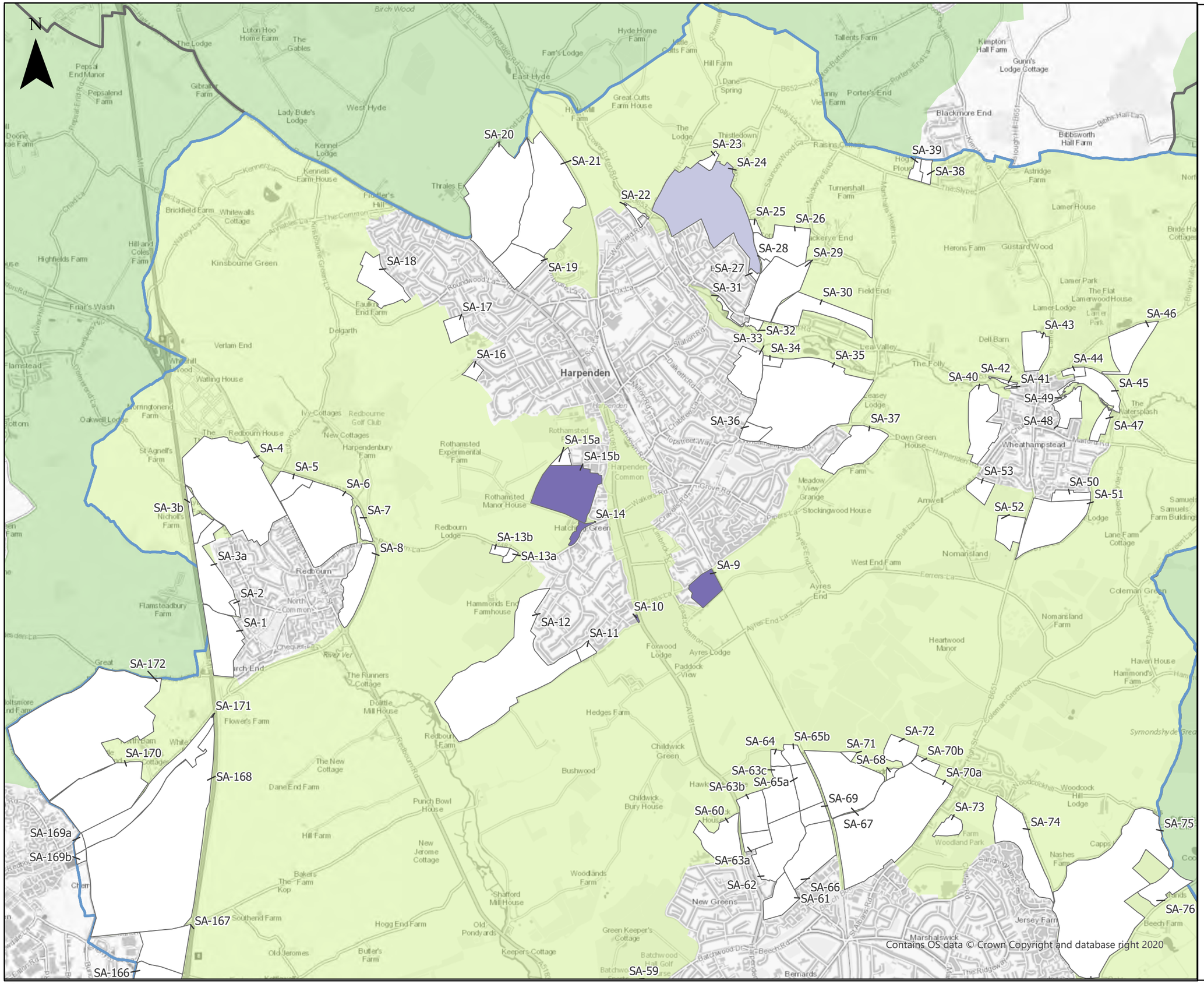
To preserve the setting and special character of historic towns

The findings of the Purpose 4 assessment are presented in Table 5.5 and Figures 5.9 and 5.10. The majority (171) of the sub-areas do not meet this purpose, as they make no contribution to preserving the setting of historic features. Five sub-areas perform weakly, whilst five sub-areas perform moderately and one sub-area performs strongly against this purpose.

Table 5.5 Purpose 4 Summary of Scores

Purpose 4 Score	Number of Sub-areas	Sub-areas					
5	1	SA-58					
3	5	SA-9	SA-10	SA-14	SA-15b	SA-59	
1	5	SA-24	SA-55	SA-57	SA-103	SA-104	
0	171	SA-1	SA-32	SA-63c	SA-87	SA-119	SA-148
		SA-2	SA-33	SA-64	SA-88	SA-120	SA-149
		SA-3a	SA-34	SA-65a	SA-89	SA-121	SA-150
		SA-3b	SA-35	SA-65b	SA-90	SA-122	SA-151
		SA-4	SA-36	SA-66	SA-91	SA-123	SA-152
		SA-5	SA-37	SA-67	SA-92	SA-124	SA-153
		SA-6	SA-38	SA-68	SA-93	SA-125	SA-154
		SA-7	SA-39	SA-69	SA-94	SA-126	SA-155
		SA-8	SA-40	SA-70a	SA-95	SA-127	SA-156
		SA-11	SA-41	SA-70b	SA-96	SA-128	SA-157
		SA-12	SA-42	SA-71	SA-97	SA-129	SA-158
		SA-13a	SA-43	SA-72	SA-98	SA-130	SA-159
		SA-13b	SA-44	SA-73	SA-99	SA-131	SA-160
		SA-15a	SA-45	SA-74	SA-100	SA-132	SA-161
		SA-16	SA-46	SA-75	SA-101	SA-133	SA-162
		SA-17	SA-47	SA-76	SA-102	SA-134	SA-163
		SA-18	SA-48	SA-77a	SA-105	SA-135	SA-164
		SA-19	SA-49	SA-77b	SA-106	SA-136	SA-165
		SA-20	SA-50	SA-77c	SA-107	SA-137	SA-166
		SA-21	SA-51	SA-78a	SA-108	SA-138	SA-167
		SA-22	SA-52	SA-78b	SA-109	SA-139	SA-168
		SA-23	SA-53	SA-79	SA-110	SA-140	SA-169a
		SA-25	SA-54	SA-80	SA-111	SA-141	SA-169b
		SA-26	SA-56	SA-81	SA-112	SA-142	SA-170
		SA-27	SA-60	SA-82	SA-113	SA-143	SA-171
		SA-28	SA-61	SA-83	SA-115	SA-144	SA-172
		SA-29	SA-62	SA-84	SA-116	SA-145	
		SA-30	SA-63a	SA-85	SA-117	SA-146	
		SA-31	SA-63b	SA-86	SA-118	SA-147	

A3



Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

Purpose 4 scores

- 0
- 1
- 3
- 5

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Figure 5.9 Purpose 4 - North

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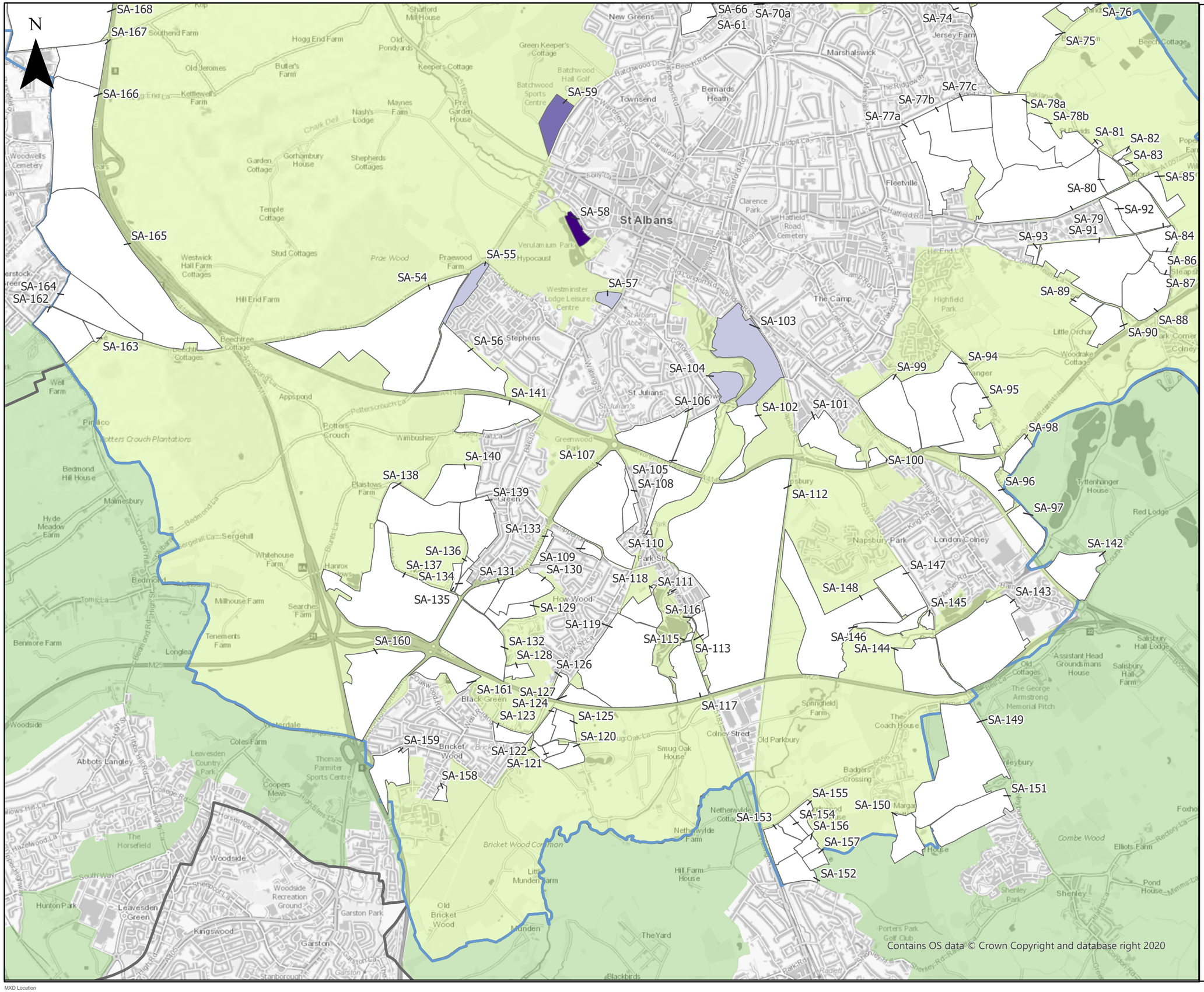

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- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

Purpose 4 scores

- 0
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- 3
- 5

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Figure 5.10 Purpose 4 - South

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5.6 Overall NPPF Performance

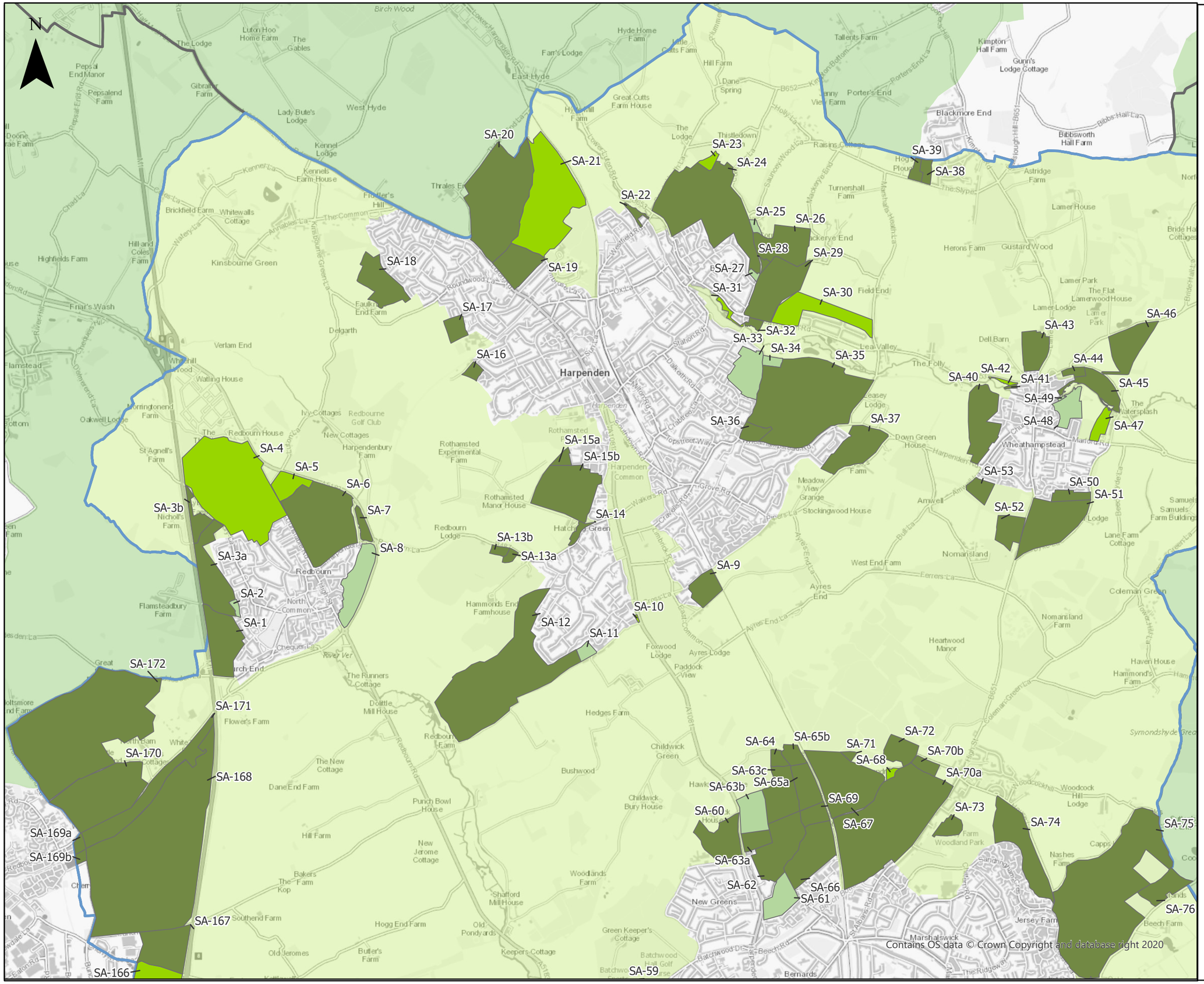
The overall NPPF performance findings are presented in Table 5.6 and Figures 5.11 and 5.12. Based on the pervious purpose 1-4 assessments, each sub-area is assessed to perform either strongly, moderately or weakly against the NPPF purposes overall. As all NPPF purposes are given equal weight, the strongest purpose score for each sub-area dictates its overall performance.

Of the 182 sub-areas, 113 perform strongly overall, whilst 35 perform moderately and 27 perform weakly overall. The remaining seven sub-areas do not meet any of the purposes.

Table 5.6 Overall NPPF Performance Summary

Overall Performance	No. of Sub-areas	Sub-areas					
Strong	113	SA-1	SA-26	SA-54	SA-73	SA-105	SA-147
		SA-3a	SA-28	SA-55	SA-74	SA-106	SA-148
		SA-3b	SA-29	SA-56	SA-75	SA-107	SA-149
		SA-6	SA-32	SA-58	SA-76	SA-108	SA-150
		SA-7	SA-35	SA-59	SA-77c	SA-110	SA-151
		SA-9	SA-36	SA-60	SA-78a	SA-112	SA-159
		SA-12	SA-37	SA-62	SA-78b	SA-118	SA-160
		SA-13a	SA-38	SA-63a	SA-79	SA-119	SA-161
		SA-13b	SA-39	SA-63c	SA-88	SA-120	SA-162
		SA-14	SA-40	SA-64	SA-89	SA-121	SA-164
		SA-15a	SA-41	SA-65a	SA-90	SA-125	SA-165
		SA-15b	SA-43	SA-65b	SA-91	SA-126	SA-167
		SA-16	SA-44	SA-66	SA-92	SA-127	SA-168
		SA-17	SA-45	SA-67	SA-94	SA-129	SA-169a
		SA-18	SA-46	SA-69	SA-95	SA-133	SA-169b
		SA-19	SA-50	SA-70a	SA-96	SA-137	SA-170
		SA-20	SA-51	SA-70b	SA-97	SA-140	SA-171
		SA-22	SA-52	SA-71	SA-98	SA-145	SA-172
		SA-24	SA-53	SA-72	SA-99	SA-146	
Moderate	35	SA-4	SA-31	SA-86	SA-122	SA-139	SA-154
		SA-5	SA-42	SA-93	SA-123	SA-141	SA-156
		SA-10	SA-47	SA-101	SA-124	SA-142	SA-157
		SA-21	SA-68	SA-102	SA-131	SA-143	SA-158
		SA-23	SA-84	SA-109	SA-132	SA-144	SA-166
		SA-30	SA-85	SA-117	SA-135	SA-152	
Weak	27	SA-2	SA-33	SA-61	SA-81	SA-113	SA-134
		SA-8	SA-34	SA-63b	SA-83	SA-115	SA-136
		SA-11	SA-48	SA-77a	SA-103	SA-116	SA-138
		SA-25	SA-49	SA-77b	SA-104	SA-128	SA-155
		SA-27	SA-57	SA-80			
Does not meet	7	SA-82	SA-100	SA-111	SA-130	SA-153	SA-163
		SA-87					

A3



Legend

- St Albans District Boundary
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- St Albans Green Belt
- Neighbouring Green Belt

Overall NPPF performance

- Does not meet
- Weakly
- Moderately
- Strongly

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Figure 5.11 Overall performance against NPPF purposes - North

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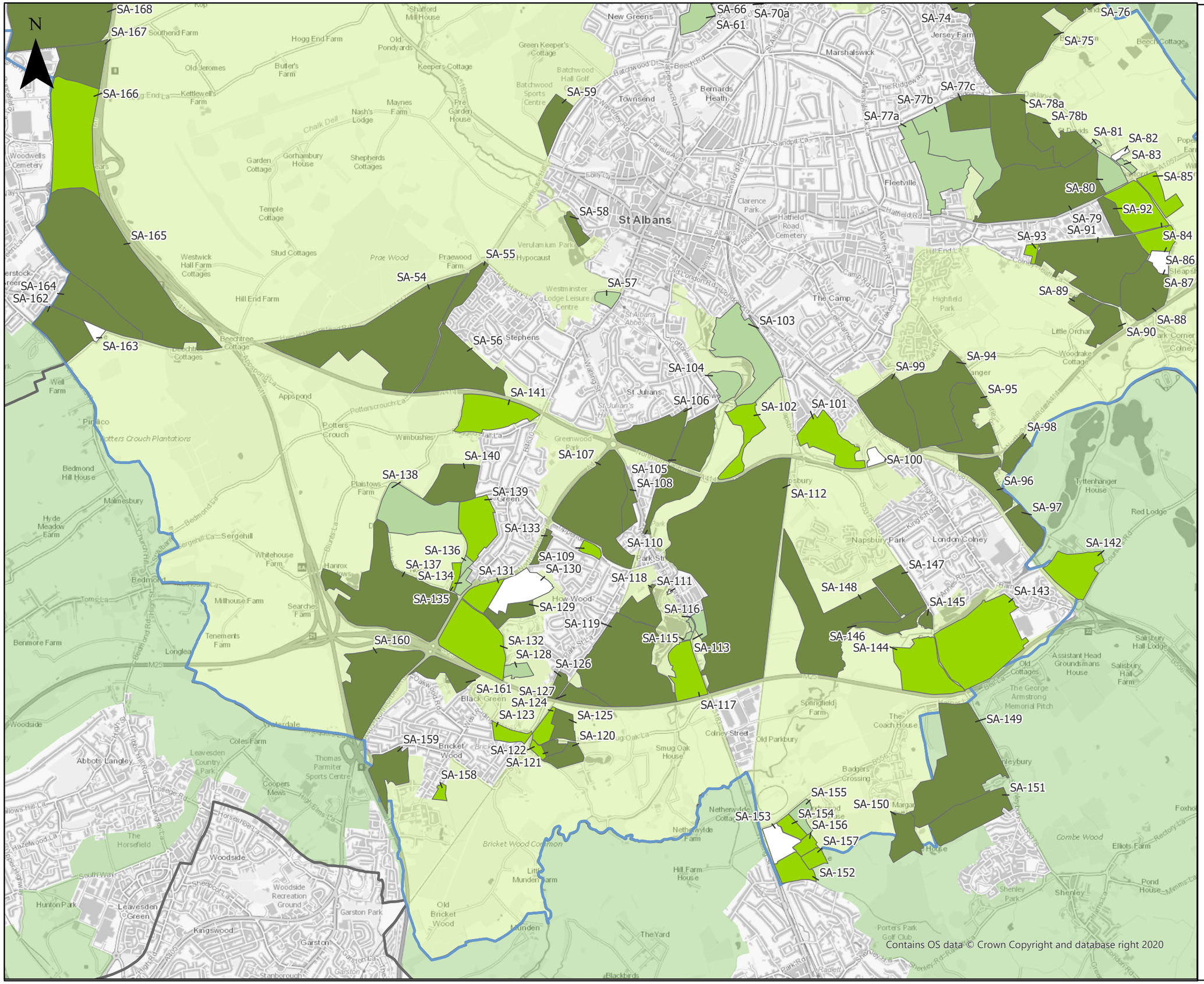

Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

Overall NPPF performance

- Does not meet
- Weakly
- Moderately
- Strongly

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Figure 5.12 Overall performance against NPPF purposes - South

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5.7 Strategic Green Belt Assessment

Reflecting the granular focus of the Stage 2 GBR, additional qualitative assessment was undertaken to identify the role of sub-areas as part of the wider Green Belt. It is possible for a sub-area not to meet the NPPF purposes as assessed in section 5.6 but still perform an important strategic role. A summary of the strategic assessment findings is provided in Table 5.7 and Figures 5.13 and 5.14.

Table 5.7 Strategic Green Belt Assessment Summary

Contribution to Wider Strategic Green Belt	No. of Sub-areas	Sub-areas				
Important	122	SA-3b	SA-52	SA-78b	SA-110	SA-142
		SA-4	SA-54	SA-79	SA-112	SA-143
		SA-5	SA-56	SA-80	SA-115	SA-144
		SA-6	SA-59	SA-81	SA-116	SA-145
		SA-7	SA-60	SA-82	SA-117	SA-146
		SA-13a	SA-62	SA-83	SA-118	SA-147
		SA-13b	SA-63a	SA-85	SA-119	SA-148
		SA-18	SA-63b	SA-86	SA-120	SA-149
		SA-20	SA-63c	SA-87	SA-121	SA-150
		SA-21	SA-64	SA-88	SA-122	SA-151
		SA-23	SA-65a	SA-89	SA-124	SA-154
		SA-25	SA-65b	SA-90	SA-125	SA-155
		SA-26	SA-66	SA-91	SA-126	SA-156
		SA-28	SA-67	SA-94	SA-127	SA-157
		SA-29	SA-68	SA-95	SA-128	SA-159
		SA-30	SA-69	SA-96	SA-129	SA-160
		SA-35	SA-70a	SA-97	SA-131	SA-162
		SA-37	SA-70b	SA-98	SA-132	SA-163
		SA-40	SA-71	SA-99	SA-133	SA-164
		SA-42	SA-72	SA-100	SA-137	SA-168
		SA-43	SA-73	SA-101	SA-138	SA-170
		SA-45	SA-75	SA-102	SA-139	SA-171
		SA-46	SA-76	SA-105	SA-140	SA-172
		SA-47	SA-77c	SA-106	SA-141	
		SA-51	SA-78a	SA-107		
Less important	54	SA-1	SA-19	SA-44	SA-84	SA-134
		SA-2	SA-22	SA-48	SA-92	SA-135
		SA-3a	SA-27	SA-49	SA-93	SA-136
		SA-8	SA-31	SA-50	SA-104	SA-152
		SA-9	SA-32	SA-53	SA-108	SA-153
		SA-10	SA-33	SA-55	SA-109	SA-158
		SA-11	SA-34	SA-57	SA-111	SA-161
		SA-14	SA-36	SA-58	SA-113	SA-166
		SA-15a	SA-38	SA-61	SA-123	SA-167
		SA-16	SA-39	SA-77a	SA-130	SA-169a
		SA-17	SA-41	SA-77b		SA-169b
Partly less important	6	SA-12	SA-24	SA-74	SA-103	SA-165
		SA-15b				

A3

N

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- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

Wider impact

- Important
- Less important
- Partly less important

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Figure 5.13 Strategic Assessment - North

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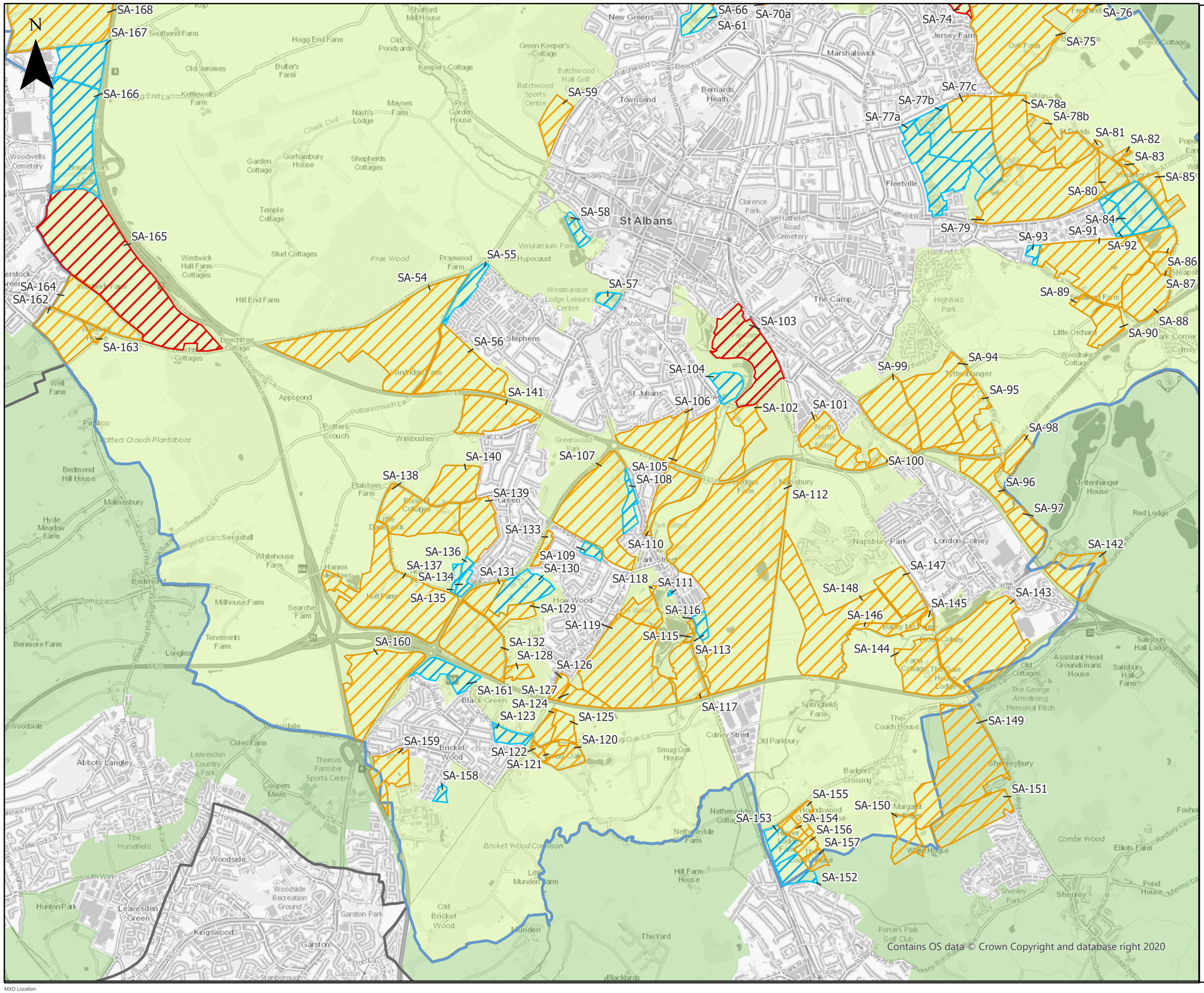

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- St Albans Green Belt
- Neighbouring Green Belt

Wider impact

- Important
- Less important
- Partly less important

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Figure 5.14 Strategic Assessment - South

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5.8 Boundary Considerations

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.

5.9 Categorisation and Recommendations

Each sub-area was categorised as to whether the sub-area (or combination of sub-areas, or part of sub-area) should be considered further. A summary of the categorisation is provided in Table 5.8 and Figures 5.15 and 5.16. Sub-areas categorised for further consideration have been recommended, in isolation and/or in combination. A few sub-areas have been partially recommended. It should be noted that the categories are not mutually exclusive, therefore it is not possible to total the number of sub-areas across the categories.

The overall recommendations are thus:

- 54 sub-areas have been recommended for further consideration in isolation ('RA's) – if removed from the Green Belt, these areas are unlikely to result in harm to the wider Green Belt; and
- 29 sub-areas have been recommended for further consideration in combination ('RC's) - if removed from the Green Belt in combination, these areas are unlikely to result in harm to the wider Green Belt but one of the constituent sub-areas could not be removed in isolation without resulting in harm.

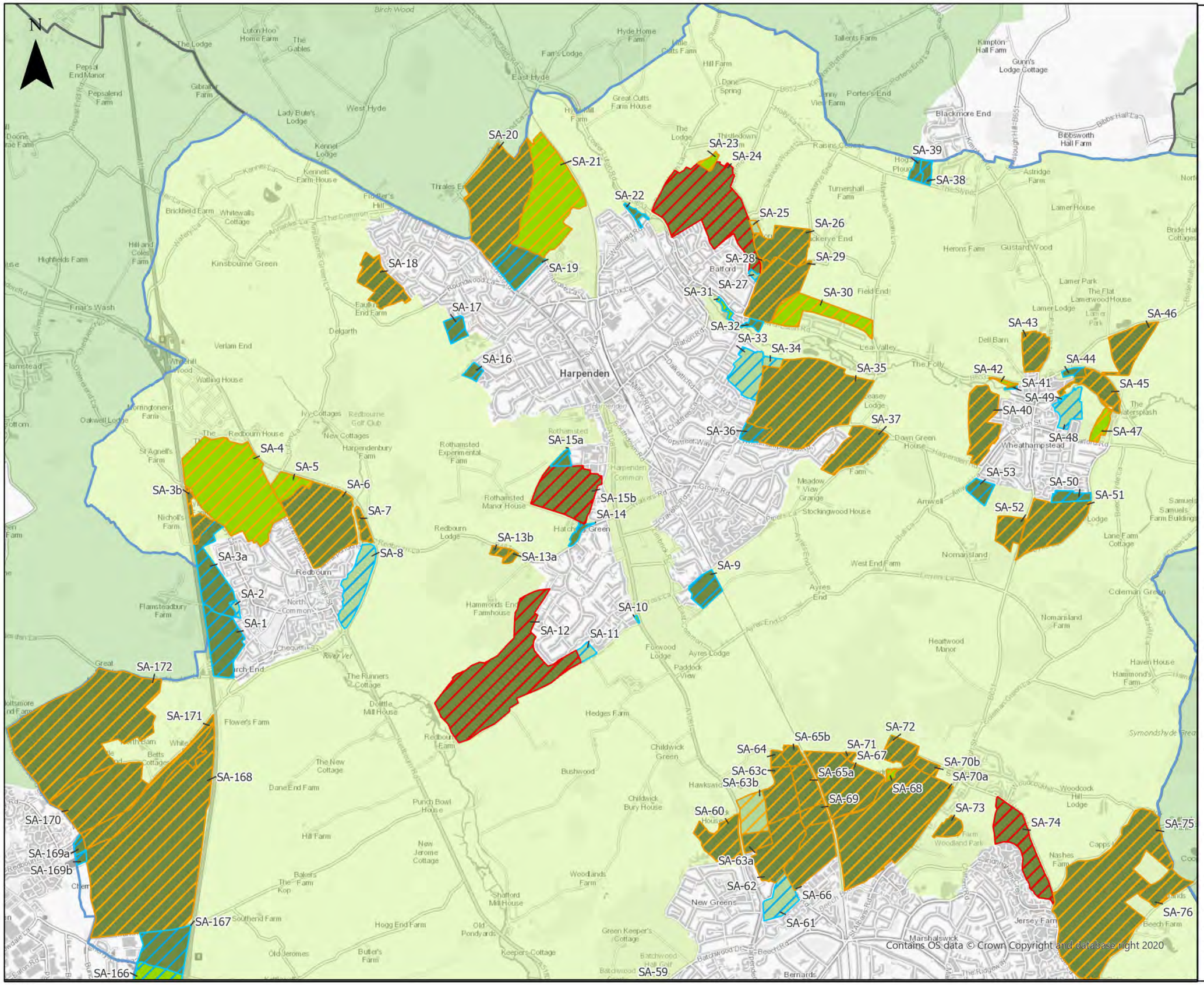
Some sub-areas are recommended both for consideration in isolation and in combination. A total of three of the recommended sub-areas are outlined for only partial further consideration (e.g. the northern section of the sub-area is to be considered further, but the southern is not). Each recommended sub-area or combination of sub-areas has been assigned a unique reference number, illustrated in Figures 5.17 and 5.18.

Table 5.8 Recommendations

Overall Performance	Contribution to the Wider Green Belt	No. of Sub-areas	Not Recommended			Recommended in Isolation Only			Recommended in Combination Only	Recommended in Isolation and / or in Combination		
Strong	Important	83	SA-3b	SA-66	SA-112	N/A			N/A	N/A		
			SA-6	SA-67	SA-118							
			SA-7	SA-69	SA-119							
			SA-13a	SA-70a	SA-120							
			SA-13b	SA-70b	SA-121							
			SA-18	SA-71	SA-125							
			SA-20	SA-72	SA-126							
			SA-26	SA-73	SA-127							
			SA-28	SA-75	SA-129							
			SA-29	SA-76	SA-133							
			SA-35	SA-77c	SA-137							
			SA-37	SA-78a	SA-140							
			SA-40	SA-78b	SA-145							
			SA-43	SA-79	SA-146							
			SA-45	SA-88	SA-147							
			SA-46	SA-89	SA-148							
			SA-51	SA-90	SA-149							
			SA-52	SA-91	SA-150							
			SA-54	SA-94	SA-151							
			SA-56	SA-95	SA-159							
			SA-59	SA-96	SA-160							
			SA-60	SA-97	SA-162							
			SA-62	SA-98	SA-164							
			SA-63a	SA-99	SA-168							
			SA-63c	SA-105	SA-170							
			SA-64	SA-106	SA-171							
			SA-65a	SA-107	SA-172							
			SA-65b	SA-110								
	Less important	25	N/A			SA-9	SA-22	SA-53	N/A	SA-1	SA-38	SA-167
						SA-15a	SA-36	SA-55		SA-3a	SA-39	SA-169a
						SA-16	SA-41	SA-58		SA-14	SA-92	SA-169b
						SA-17	SA-44	SA-108		SA-32		
						SA-19	SA-50	SA-161				
	Partly less important	5	N/A			SA-12	SA-74		N/A	SA-15b	SA-24	SA-165

Overall Performance	Contribution to the Wider Green Belt	No. of Sub-areas	Not Recommended			Recommended in Isolation Only			Recommended in Combination Only			Recommended in Isolation and / or in Combination		
Moderate	Important	25	SA-4 SA-5 SA-21 SA-23 SA-30 SA-42 SA-47 SA-68 SA-85	SA-86 SA-101 SA-102 SA-117 SA-122 SA-124 SA-131 SA-132	SA-139 SA-141 SA-142 SA-143 SA-144 SA-154 SA-156 SA-157	N/A			N/A			N/A		
	Less important	10	N/A			SA-10 SA-93	SA-109 SA-123	SA-158	SA-84	SA-135		SA-31	SA-152	SA-166
	Partly less important	0	N/A			N/A			N/A			N/A		
Weak	Important	10	SA-25 SA-63b SA-80 SA-81	SA-83 SA-115 SA-116	SA-128 SA-138 SA-155	N/A			N/A			N/A		
	Less important	16	N/A			SA-8 SA-11	SA-57 SA-61	SA-104 SA-113	SA-34	SA-77b	SA-136	SA-2 SA-27 SA-33	SA-48 SA-49	SA-77a SA-134
	Partly less important	1	N/A			SA-103			N/A			N/A		
Does not meet	Important	4	SA-82 SA-87	SA-100	SA-163	N/A			N/A			N/A		
	Less important	3	N/A			SA-111	SA-130		SA-153			N/A		
	Partly less important	0	N/A			N/A			N/A			N/A		

A3



Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

Overall NPPF performance

- Does not meet
- Weakly
- Moderately
- Strongly

Wider impact

- Important
- Less important
- Partly less important

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Figure 5.15 Categorisation - North

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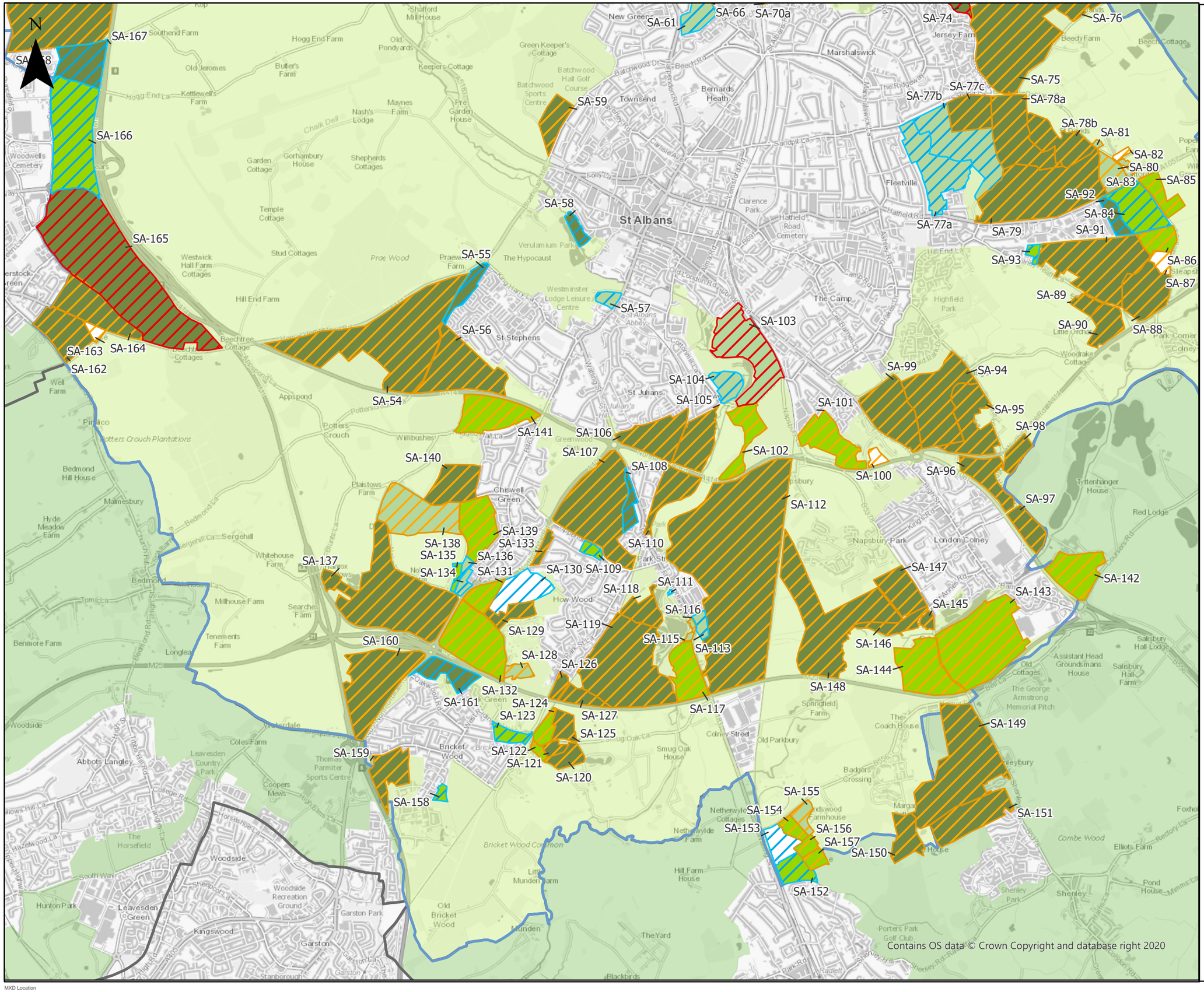

Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt

Overall NPPF performance

- Does not meet
- Weakly
- Moderately
- Strongly

Wider impact

- Important
- Less important
- Partly less important

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P2	25/01/2023	AD	KF	CT

Metres

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Client

St Albans City & District Council

Job Title

St Albans Green Belt review

Figure 5.16 Categorisation - South

Scale at A3

1:35,000

Job No	Drawing Status
280045-00	**Issued**

Drawing No	Issue
001	**P3**

MXD Location

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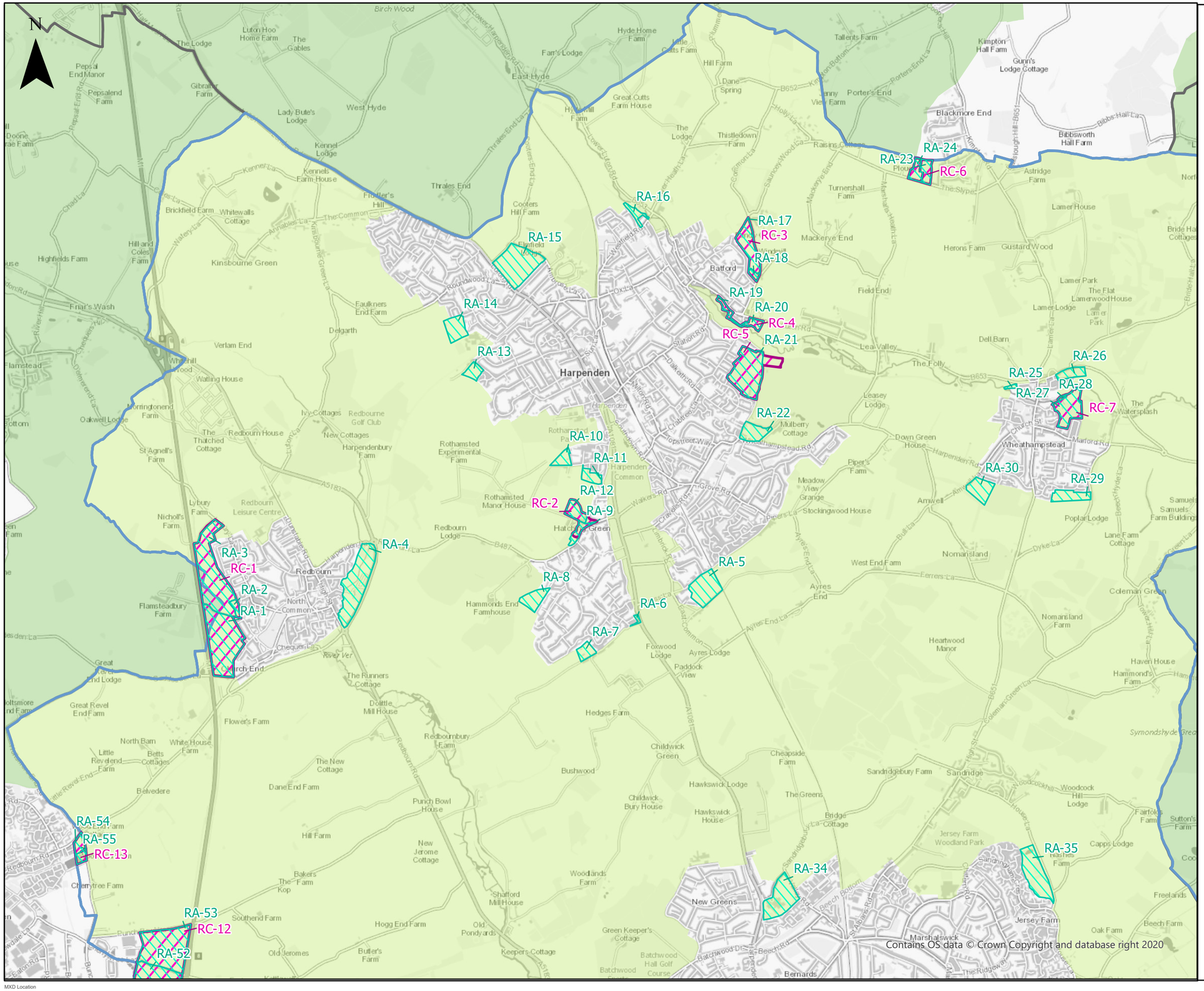
A3



MXD Location

Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt
- Recommended for further consideration in combination
- Recommended for further consideration in isolation

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St Albans City & District Council

Job Title

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Figure 5.17 Recommendations - North

Scale at A3

1:35,000

Job No	Drawing Status
280045-00	**Issued**

Drawing No	Issue
001	**P3**

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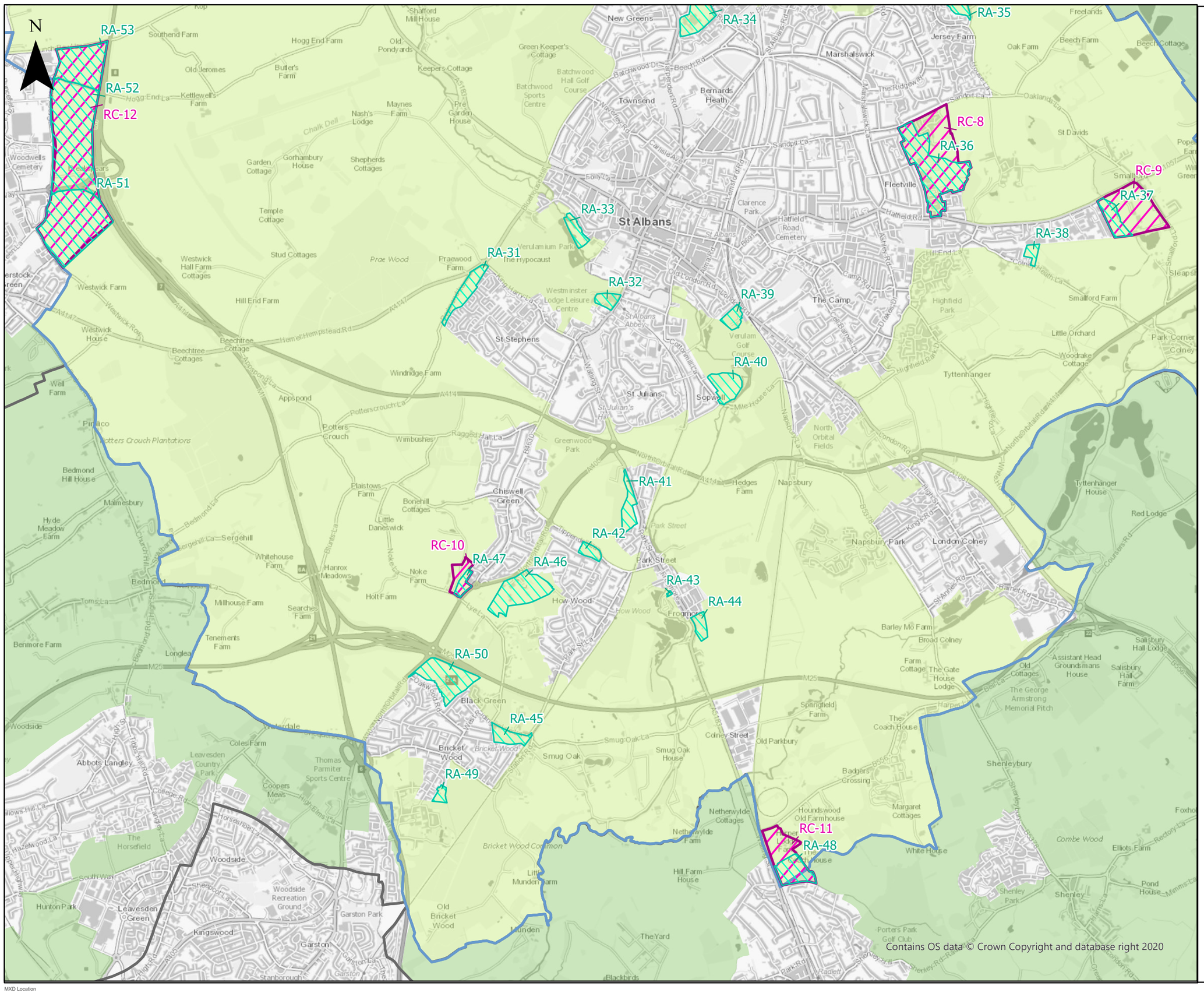

Legend

- St Albans District Boundary
- Neighbouring District Boundary
- St Albans Green Belt
- Neighbouring Green Belt
- Recommended for further consideration in combination
- Recommended for further consideration in isolation

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Job Title

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Figure 5.18 Recommendations - South

Scale at A3

1:35,000

Job No	Drawing Status
280045-00	**Issued**

Drawing No	Issue
001	**P3**

MXD Location

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6. Washed Over Villages Key Findings

6.1 Findings

The following settlements were assessed as having both and 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.

Radlett Road and Frogmore

Radlett Road and Frogmore was found to have an open character, but it was not considered to positively contribute to the openness of the Green Belt. The Washed Over Village Assessment therefore recommended that the village should be considered further for insetting.

However, it is important to consider the village in the context of the wider Stage 2 Green Belt assessment. The land immediately surrounding the village was assessed as sub-areas SA-112, SA-113, SA-115, SA-116, and SA-117. SA-112 and SA-117 make up the majority of the landscape surrounding the settlement boundary and both sub-areas were found to play an important role with respect to the strategic land parcels. Releasing the village from the Green belt is likely to undermine or significantly harm the performance of these sub-areas of the wider Green Belt and therefore it is recommended that the settlement should retained its “washed over” status.

Therefore, although the village performs ‘low’ against the washed over assessment criteria, it is nevertheless recommended that it is not inset and instead, remains within the Green Belt. This is due to the integral role that the village and the wider surrounding Green Belt holds in this location.

Gustard Wood

The washed over settlement of Gustard Woods lies immediately adjacent to the settlement of Blackmore End in North Hertfordshire. Through Duty to Cooperate meetings, North Hertfordshire District Council have indicated that they are considering creating additional Green Belt to the east of Blackmore End, which itself will become an inset settlement. If this proposed change is taken forward, then further consideration should be given to the appropriateness, or otherwise, of also insetting Gustard Wood.

6.2 Summary

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.

7. Compensatory Improvements

7.1 Context

The NPPF (July 2021) Paragraph 142 states that where it has been concluded that it is necessary to release Green Belt land for development, the Local Plan should 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. The NPPF takes a realistic view that some development may be required to meet housing targets, however there is also recognition of the importance of considering green belt as an environmental asset and how it can be improved including for accessible public open space.

NPPF paragraph 145 goes on to state that once Green Belt has been defined, local planning authorities should plan positively to enhance its 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.

Planning Practice Guidance Paraph 002 provides further details on how plans might set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements. It suggests that compensatory improvements should be informed by 'supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies.'[29] This could include:

- New or enhanced green infrastructure;
- Woodland planting;
- Landscape and visual enhancements;
- Improvements to biodiversity, habitat connectivity and natural capital;
- New or enhanced walking and cycle routes; and
- Improved access to new, enhanced or existing recreational and playing field provision.

7.2 Opportunities to Deliver Green Belt Enhancement

The enhancement of Green Belt land requires delivery of projects on land which is not proposed for release for future development. It would ideally look for opportunities to enhance poorly performing Green Belt, particularly where the sense of openness in countryside has already been diminished, or Green Belt land in proximity to allocated sites which could be enhanced to provide opportunities for accessible and public open spaces for leisure and recreational purposes. Compensatory improvements could be through the delivery of strategic initiatives, for example the creation of a new community woodland or local nature reserves, or through more local enhancements such as upgrades to public rights of way (PRoW) to improve accessibility to open spaces. Consideration could be given to appropriate sports and recreation facilities within the Green Belt in line with the NPPF as long as they preserve the openness of the Green Belt[30].

In the first instance, a review of the opportunities to enhance Green Belt land surrounding Green Belt sites which are proposed to be removed from the Green Belt and allocated for housing development should be undertaken. The Green Belt Reviews should be used to identify the recommended areas which would cause least harm if they released from the Green Belt, and which

[29] Planning Policy Guidance Paragraph: 002 Reference ID: 64-002-20190722, Revision date: 22 07 2019

[30] Sport England (2019) Planning for Sport Guidance

could be released from the Green Belt for future development. The sites for potential release from the Green Belt, as identified in the Council's site selection work, should be mapped in relation to the existing Green Belt boundary. This provides an indication of opportunities for the locations of compensatory improvements adjacent to new homes delivered in the future. Areas of land which perform weakly against the NPPF Green Belt purposes, but which are not recommended for release, should also be mapped. These areas could potentially benefit from compensatory improvements to enhance their environmental asset value. Specific details relating to opportunities on these Green Belt should then be explored.

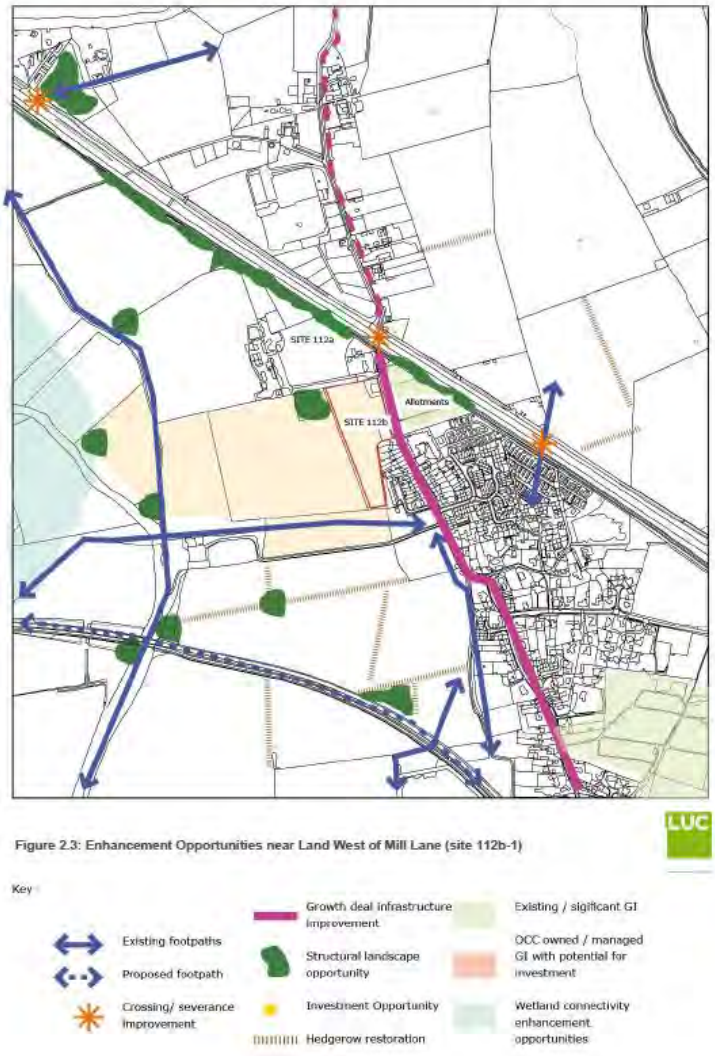
Information in existing studies should be used to inform and justify the identification of potential compensatory measures. Following the PPG Guidance, this should focus on supporting evidence on landscape, biodiversity or recreational needs. For example, project requirements could be identified in Green Infrastructure, Open Space and Active Travel Strategies. These may range in scale and could include strategic or local interventions in or adjacent to the sites, for example improvements to existing PRoW (improving access), enhancing links to nearby recreation grounds (sports and recreation), enhancement to existing woodlands improve biodiversity (biodiversity and wildlife corridors), or additional tree planting and landscaping to screen the allocation as far as possible (landscape and visual amenity). St Albans City and District Council already have an established evidence base which should be used to identify potential projects that could be used as compensatory measures, as in Appendix C.

As an example, Oxford City Council has commissioned a separate study looking to identify the opportunities to enhance the beneficial uses of Green Belt land[31] adjacent, or in close proximity to sites proposed for release. Using the evidence bases in addition to mapping and aerial photography, a detailed review was undertaken of land surrounding the sites proposed for release from the Green Belt. The review focussed on highlighting key potential opportunities for enhancing the following, in line with NPPF:

- Access, specifically the links between PRoW
- Biodiversity and wildlife corridors
- Landscape and visual amenity.
- Where possible, the multi-benefits that the potential improvements could bring were also highlighted. For each potential opportunity for Green Infrastructure enhancement in the land surrounding the Green Belt sites proposed for housing development, the following information was presented:
- A photograph of the Green Belt site itself and surrounding area.
- A map of the key infrastructure features and environmental/heritage assets.
- Description of the site proposed for allocation and its size.
- A map showing the location of the potential opportunities to enhance the Green Belt near to the proposed site allocation.
- A summary of the key potential GI opportunities.
- Supporting documents which provide evidence to justify the requirement for the scheme.
- An example of an enhancement opportunity on an allocated site in Oxford is presented in Figure 7.1

[31] Oxford City Council (2018) Identification of opportunities to enhance the beneficial use of Belt land [assessed 15 October 2021] available here: https://www.oxford.gov.uk/downloads/file/5731/grs3_-_identification_of_opportunities_to_enhance_the_beneficial_use_of_green_belt_land

Figure 7.1 Example of Enhancement Opportunities on an Allocated Site
Source: Oxford City Council (2018) Identification of opportunities to enhance the beneficial use of Green Belt land



7.3 Local Plan Policy

It is likely that SACDC already have policies to support the principles of improving the Green Infrastructure Network across the District. However, SACDC could also consider embedding the need for compensatory improvements into a policy within the Local Plan. This would mean that the policies in the Plan would inform decisions on planning applications and would be eligible to receive developer contributions. For example, St Helens Council are currently recommending modifications to the Local Plan 2020 – 2035 Submission Draft (2019)[32] to specifically reference the need for Green Belt compensatory improvements following the release of Green Belt land. Suggested modification to policy LPA02 section 4 is as follows:

"Delivery of compensatory improvement measures within areas remaining in the Green Belt will be required following any release of Green Belt land for development purposes. Details of such improvements will be considered during the development management process and assessed on an individual basis".[33]

[32] St Helens Council (2019) St Helens Borough Local Plan 2020 – 2035 Submissions Draft [accessed 15 October 2021] Available at: https://www.sthelens.gov.uk/media/9525/local-plan-written-plan-web.pdf

[33] St Helens Council (2020) St Helens Green Belt compensatory measures information paper [accessed 15 October 2021] Available at: https://www.sthelens.gov.uk/media/333610/shbc028-st-helens-greenbelt-compensatory-measures-information-paper.pdf

In addition, St Helens Council are recommending a further modification to the reasoned justification to clarify the requirement for Green Belt Compensatory Improvement measures as follows, to provide clarity on the expectations to deliver improvements to offset the release of Green Belt:

"In addition, the Council aims to protect and enhance remaining areas of Green Belt by seeking the delivery of compensatory improvement measures. In accordance with paragraph 138 of the NPPF, delivery of compensatory improvement measures will be sought when sites are released from the Green Belt for development as part of this plan. Such measures should enhance the environmental quality and accessibility of the remaining Green Belt land, amongst other improvements. Further guidance is provided within the National Planning Practice Guidance (Green Belt Land)."

Cheshire East Draft Site Allocations and Development Policies Document (2020)[34] also includes Policy PG 11 relating to Green Belt boundaries, stating in part 3 that:

"Development proposals for these sites [to be removed from the Green Belt] should include compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of the removal of the land from the Green Belt."

7.4 Delivery

Planning guidance explains how plan makers should seek compensation from promoters for land released from the green belt for development. Landowners expected to assist in the delivery of sustainable urban expansions should ensure this involves local or strategic scale environmental improvements to compensate for the impact. This ensures multi-benefits are realised, benefitting from the environmental and asset improvements of green belt sites, in addition to new homes. Where land is already owned by the local authority, the process to deliver compensatory improvement projects is relatively straight forward, however, is more involved where privately owned.

PPG Green Belt paragraph 003 discusses how the strategic policy-making authority can ensure that compensatory improvements will be secured[35]. This sets out that early engagement with landowners and interest groups is necessary. The PPG goes onto state that consideration will need to be given to:

- 'land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;
- the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability;
- the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible. Section 106 agreements could be used to secure long-term maintenance of sites.'

[34] Cheshire East District Council (2020) Cheshire East Local Plan Revised Publication Draft Site Allocations and Development Policies Document September 2020 [Accessed 15 October 2021] Available at: https://www.cheshireeast.gov.uk/planning/spatial-planning/cheshire_east_local_plan/site-allocations-and-policies/sadpd-examination/documents/examination-library/ed01b-revised-pub-draft-sadpd-clean-version.pdf

[35] Planning Policy Guidance Paragraph: 003 Reference ID: 64-003-20190722,

Revision date: 22 07 2019

Oxford City Council stated that consultation with landowners, local groups and community representatives will be essential to the effective delivery and long-term maintenance of green infrastructure features. The Councils 'Identification of opportunities to enhance the beneficial use of Green Belt land' (2018) study states that consultation seeks to achieve the following:

- Allow interested parties to comment on opportunities which have been identified on their property, or related to sites and infrastructure in which they have an interest.
- Provide an opportunity to raise any concerns about the proposals, identify constraints, and comment on potential design.
- Enable the partnership to refine its priorities and deliver GI enhancements with the support of the wider business and residential communities.

In the case of Rossendale Borough Council, the Council prepared a note setting out a range of compensation measures for site allocations which would involve Green Belt release[36]. This was emailed to landowners and developers of the affected site allocations to seek their views, who were generally supportive of the Council's aspirations to provide compensatory improvements. Requirement to work in collaboration with adjoining landowners to obtain access and permission for the proposed measures such as PRoW was also an important step in the engagement process.

Landowners raised some feedback to Rossendale Borough, stating that the compensatory measures should be based on up-to-date evidence to justify their need; where evidence was due to be updated, landowners requested a right to comment further on expected measures. Further, developers requested that the Council should be clear on the cost involved to deliver the proposed compensation measures and should form part of the Viability Assessment. Without such, the developers stated that it would be difficult to provide a firm commitment to the measures set out. To meet the tests of developer contribution agreements, compensatory measures are required to evidence that they are directly related to the development and necessary to mitigate its impacts. Therefore, measures should focus on Green Belt adjacent to or near the sites proposed for release as it will help demonstrate that any improvements and associated financial contributions are directly related to the development, to satisfy CIL tests.

7.5 Case studies

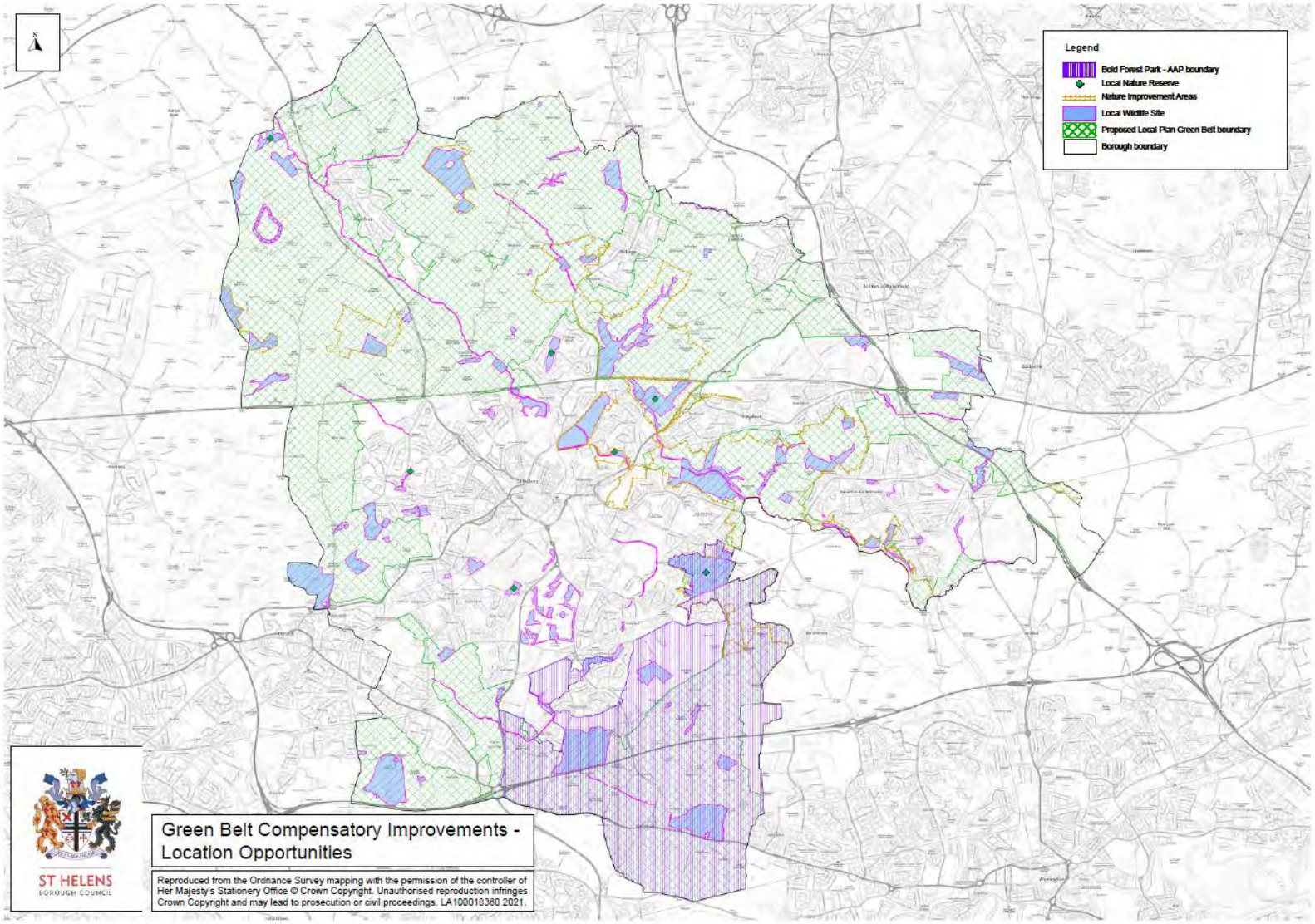
The two case studies below provide examples of how compensatory improvement measures have been both identified through supporting policies, and those delivered on-site. The multi-benefits of the schemes are also set out.

7.5.1 St Helens Borough

St Helens Borough has two strategic areas that they identify as important in the delivery of compensatory improvements in the Green Belt – Bold Forest Park and Sankey Valley Corridor (Figure 7.2). Both strategic priorities are supported by Area Action Plans (AAPs) which form part of the local development land for St Helens Borough. The AAPs contain detailed policies and actions needed to develop and sustain the Green Infrastructure assets. This provides justified evidence in the negotiation for compensatory improvement to Green Belt land from developers delivering adjacent schemes.

[36] Rossendale Borough Council (2020) Compensatory Measures for Green Belt Release [accessed on 15 October 2021] Available here: https://www.rossendale.gov.uk/downloads/file/16205/el800810_action_810_compensatory_measures_for_green_belt_release

Figure 7.2 St Helens Council Green Belt Compensatory Improvements Location Opportunities
Source: St Helens Council (2020) St Helens Green Belt Compensatory Measures Information Paper



The Bold Forest Park APP includes projects which are appropriate to be considered as compensatory improvement projects. This includes increasing tree coverage and enhancing biodiversity through integrating wildlife habitats into the ecological habitat in the Forest Park. The AAP also has a focus on increasing the visitor economy, with specific reference to the creating and enhancement of visitor hubs and associated infrastructure. The Sankey Valley Corridor Nature Improvement Area begins in north of St Helens and travels through many settlements to the borough boundary. The Sankey Catchment Action Plan (2018) provides a framework which will enable enhancements of the aquatic environment as well as the surrounding natural environments.

7.5.2 Doncaster Council

Doncaster Council has identified a scheme to offset harm to the Green Belt by simultaneously addressing the overall loss arising from the removal of sites for allocation. The Doncaster Council (2019) Green Belt Topic Paper outlines how the Green Belt boundary in Rossington has been amended to incorporate land which will form a new country park entirely within the Green Belt,[37] including restoration, new habitat creation, and public open space, to the south of the colliery redevelopment (Figure 7.3).

The inclusion of the land in the Green Belt is considered to have multi-benefits, in line with the NPPF, including environmental and biodiversity enhancements from the implementation of wildlife areas, woodlands, new hedgerows and an area set aside for wetland habitats. As such, while land is being removed from the Green Belt elsewhere in the Borough, some of this impact is being offset by increasing the amount of Green Belt at the Colliery, while ensuring it is of good quality, repurposed for open space and accessible to the public. A new defensible Green Belt was created to the south of the proposed housing development of the former colliery.

The Topic Paper notes that the Inspectors Report accepted the main modification to amend the development requirements for the housing allocation on the former Rossington Colliery so that the Plan is effective in securing a permanent Green Belt boundary. This adds 19 hectares of land on the southern part of the colliery to the Green Belt adjoining the new Country Park. The Doncaster Local Plan 2015-2035 is due to be adopted on 23rd September 2021, with the amended Green Belt boundary[38].

Doncaster Council proposed additional Green Belt land to enable strategic compensatory improvements at the redevelopment of the former Rossington colliery land.

[37] See applications 11/02305/MINA and subsequent applications 14/02187/WCCC and 18/01186/COND).

[38] Doncaster Local Plan (2021) amended Green Belt boundary map available here: shown on the Adopted Policies Map https://dmbc.maps.arcgis.com/apps/webappviewer/index.html?id=9e84afee16aa4746ac8cda448ab85f2c)

Figure 7.3 Additional Green Belt
Source: Doncaster Council (2019) Doncaster Local Plan Publication: Green Belt Topic Paper[39]

7.6 Summary

As outlined above, 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.

[39]https://dmbcwebstolive01.blob.core.windows.net/media/Default/Planning/Documents/Local%20Plan/Green%20Belt/Green%20Belt%20Topic%20Paper.pdf

8. Conclusions

8.1 Green Belt Assessment

Since its creation in the 1930s, the St Albans Green Belt has performed an important role as part of the wider Metropolitan Green Belt for London preventing urban sprawl and merging of settlements and ensuring the provision of open countryside for all. The entirety of the Green Belt was assessed as part of the Green Belt Review Purpose Assessment[40] (Stage 1). This review builds on this study and includes a more refined and spatially focussed assessment to complement the conclusions formed in the Stage 1 review.

This study has examined the performance of Green Belt within St Albans against the NPPF purposes deemed relevant in this context (i.e. purposes 1-4) using granular land parcels (sub-areas) as the unit of analysis. A total of 182 sub-areas were identified for this review. To ensure an exhaustive approach, these were based on the weakly performing strategic sub-areas and small-scale sub areas identified for further consideration in SKM Stage 1 GBR as well as sites within the Green Belt emerging from the Council's own work on sites.

In defining areas for assessment, a buffer was applied around each settlement inset from the Green Belt (in St Albans and the immediately adjacent settlements in neighbouring authorities) as an indication of land that would support sustainable patterns of development (see Appendix A3.2 for examples of experience elsewhere under this approach). Sites that were not adjacent to existing urban areas (or the buffers) were thus excluded from the assessment. Within the applied buffers, SKM Stage 1 GBR weakly performing land and promoted sites identified through the Council's site selection work, were considered further for refinement; sites falling outside the buffer, but adjoining areas or sites located within the buffer, were considered further. Where a prominent outer boundary feature forms a natural stop to the settlement, sites beyond this feature were not considered. The final stage in refining sub-areas for assessment was to apply the following major policy constraints which effectively rule out the development of land:

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

The approach to assessing the sub-areas against the NPPF purposes 1-4 reflected the more focused, granular nature of the review, whilst maintaining consistency with the overarching principles of the SKM Stage 1 GBR methodology. Critically, the recommendations are underpinned by explicit consideration of the role and importance of smaller sub-areas in terms of the function of the wider Green Belt, taking into consideration the strategic land parcel scores from the SKM Stage 1 GBR as well as wider considerations regarding the integrity of the Green Belt. For example, it considered whether the release of sub-areas might result in 'holes' in the Green Belt, which relate poorly to existing inset areas. In addition, the assessment considered the potential for cumulative harm to the Green Belt in instances where multiple sub-areas might be released together.

[40] SKM (2013) Green Belt Review Purposes Assessment for Dacorum, St Albans and Welwyn Hatfield, Final Report

Consideration was also given to potential impacts upon the relative strength of the Green Belt boundary and whether new boundaries would be defined 'clearly, using physical features that are readily recognisable and likely to be permanent' (in line with Para 139 of the NPPF).

Of the 182 sub-areas assessed, 122 were recommended for retention in the Green Belt. Ensuring maximum protection for Green Belt in line with national policy, should continue to be a core planning principle in the formulation of Local Plan policy and a key consideration in the development of the future growth strategy for the district.

The remaining 60 sub-areas were recommended for further consideration:

- 54 sub-areas have been recommended for further consideration in isolation ('RA's) – if removed from the Green Belt, these areas are unlikely to result in harm to the wider Green Belt; and
- 29 sub-areas have been recommended for further consideration in combination ('RC's) - if removed from the Green Belt in combination, these areas are unlikely to result in harm to the wider Green Belt but one of the constituent sub-areas could not necessarily be removed in isolation without resulting in harm.

Some sub-areas are recommended both for consideration in isolation and in combination. A total of five of the recommended sub-areas are outlined for only partial further consideration (e.g. the northern section of the sub-area is to be considered further, but the southern is not). Each recommended sub-area or combination of sub-areas was assigned a unique reference number, illustrated in Figures 5.15 and 5.16.

8.2 Potential Amendments to the Green Belt

It is important to note that the recommendations set out in this report will not automatically lead to the release of land. The areas identified through this study as warranting further consideration will need to be subject to more detailed assessment and / or consideration in terms of the wider balance of planning factors. Ultimately this review will sit as part of a suite of evidence base documents that will be used to inform future plan making. Following this study, it will be for the Council to make decisions as part of updating the Local Plan, which will determine which areas might be released from the Green Belt.

The recommendations from the Stage 1 GBR and Stage 2 GBR should be considered by the Council in the decision-making process for amending Green Belt boundaries. In instances where recommendations from the Stage 1 GBR and Stage 2 GBR overlap (for example, for the release of both the wider General Area and more refined sub-area(s)), it is suggested that the Council considers which scale of release is most appropriate as part of the wider spatial strategy. The refined assessment at Stage 2 does not supersede the results of the Stage 1 assessment.

With regards to the Green Belt assessment, aside from excluding sub-areas which are wholly or predominantly affected by absolute constraints, it should also be noted that all recommendations have been made based on the performance of sub-areas against NPPF purposes, and their performance in the context of the wider Green Belt. Suitability in terms of sustainability, deliverability, infrastructure and wider planning considerations has not been taken into account in the recommendations. It will fall to SACDC to further assess the sustainability and delivery of areas of land assessed through the Stage 2 GBR where appropriate, as part of the wider plan-making process. Should further work demonstrate that sites are not sustainable or deliverable, the Council may recommend that the parcels should be retained within the Green Belt.

It should be noted that the relative strength of boundaries was not a determining factor in the final recommendations given it may be possible in certain circumstances to secure mitigation to strengthen currently weak boundaries or to provide new boundaries where gaps exist (e.g. through a

site allocation policy). While it is noted where this might be required in the final recommendations, the decision on the appropriateness of strengthening existing, or creating new boundaries, will be for the Council to make, taking into account how such mitigation might be secured.

The Council will also need to carefully consider whether, in accordance with the NPPF, there are any exceptional circumstances that justify the Green Belt boundary to be altered through the Local Plan review. At that time, the Council will need to consider the Green Belt boundary, having regard to its intended permanence in the long term, so that any proposed boundaries are capable of enduring beyond the Plan period.

Where any Green Belt land is released as part of the plan making process, compensatory improvements to the environmental quality and accessibility of remaining Green Belt land must be considered as set out in Paragraph 142 of the NPPF in order to offset impacts of the release. Compensatory improvements may take different forms, either through strategic initiatives or local enhancements, and should seek to improve the quality of poorly performing Green Belt where possible. The Council will need to consider the inclusion of appropriate policy within the emerging Local Plan.

Appendix A

Policy, Guidance and Experience Elsewhere Review

A.1 Policy and Guidance Context

The Stage 1 GBR set out the relevant policy and guidance for undertaking such an assessment. As far as this is still relevant given the publication of a revised NPPF and guidance, it has continued to shape the methodology for the GBR Stage 2. This section, therefore, provides an update on policy and guidance since the GBR was undertaken.

A.1.1 National Planning Policy Framework

A.1.1.1 Green Belt Role and Function

Since the GBR, changes have been made to national planning policy. Although it should be noted that most policies relating to Green Belt in the 2021 NPPF remain unchanged from the 2012 NPPF, i.e.

- the importance of the Green Belt and its overarching aim to prevent urban sprawl by keeping land permanently open (paragraph 137),
- the five purposes (paragraph 138),
- the intended permanence of the Green Belt (paragraph 139),
- alterations only to be undertaken in exceptional circumstances (paragraph 140),
- the need to take into account sustainable patterns of development (paragraph 142),
- boundary definition requirements (paragraph 143), and
- need for positive planning in the use of Green Belt land (paragraph 145).

The changes in the NPPF provided further clarity on the factors which local planning authorities must take into account when proposing release of land from the Green Belt (paragraph 141). This includes ensuring the redevelopment of brownfield land is maximised and density of development optimised before amendments to Green Belt boundaries are considered. The need to demonstrate how the impact of removing land from the Green Belt will be compensated was also introduced (paragraph 142).

A.1.1.2 Boundaries

The general extent of Green Belts across the country including in St Albans is already established. Established Green Belt boundaries should

> 'only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans'. (paragraph 140)

Paragraph 140 continues that strategic policies should establish the need for any changes to Green Belt boundaries, having regard to this intended permanence in the long term. Importantly, paragraph 142 states that when reviewing existing 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.'

When defining Green Belt boundaries, of note is paragraph 143 (a), (b) and (f) that states that plans should:

> ‘(a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;
>
> (b) not include land which it is unnecessary to keep permanently open...; and
>
> (f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.’

A.1.1.3 Washed over villages

As set out by the NPPF, those villages that do make an important contribution to the openness of the Green Belt due to their open character should remain washed over. This means that the whole village will retain its Green Belt designation. Any planning applications within these villages would therefore continue to be considered against national Green Belt policies. The NPPF limits development in the Green Belt in line with the fundamental principle to keep land permanently open. Paragraph 144 specifically presents the policy for villages located in the Green Belt as follows:

> “Paragraph 144. 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.”

Here, the NPPF considers the inclusion of villages in the Green Belt as necessary where the village actively contributes to the overall openness of the Green Belt. Development in villages, assessed as making an important contribution in the Green Belt, is therefore restricted and only approved if very special circumstances are demonstrated. The NPPF states that:

> “Paragraph 147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
>
> Paragraph 148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

A.1.1.4 Sustainable Development

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.”

A.1.2 South West Herts Joint Strategic Plan

Hertsmere Borough Council, Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council and Watford Borough Council have begun work on a Joint Strategic Plan (JSP) for the South West Hertfordshire Area. The work is supported by Hertfordshire County

Council. A principle aim is to ensure that infrastructure including transport, education, health and utilities, are properly coordinated and delivered alongside the need for new homes and jobs. The JSP will set up a strategic framework and shared priorities within which individual local plans can be prepared at the responsibility of each council.

A.1.3 Local Plan

The current adopted Local Plan is the District Local Plan Review 1994 (saved policies), which include the following policies relating to the Metropolitan Green Belt:

- Policy 1 Metropolitan Green Belt
- Policy 8 Affordable housing in the Metropolitan Green Belt
- Policy 13 Extensions or replacement of dwellings in the Green Belt
- Policy 60 Garden Nurseries in the Green Belt
- Policy 96 Medium intensity leisure uses in the Green Belt.

This policy is unchanged since the Stage 1 GBR.

A.1.4 Emerging Local Plan

St-Albans submitted a Publication Draft of their new Local Plan 2020-2036 for examination on 29th March 2019. In July 2019, the inspectors wrote to the council highlighting their concern with the release of land from the Green Belt set out in the plans and asking for evidence on the methodology and criteria used in their assessment of the Green Belt. In April 2020, the Inspectors recommended that the plan should be withdrawn by SACDC on the following grounds:

- The Green Belt Review lacked details and failed to review small sites.
- The Green Belt Review was published in 2013, when the housing need context was different and had not been updated to reflect the current context.
- Lack of evidence of discussion with neighbouring authorities to demonstrate an on-going, active and constructive engagement under the 'Duty to Cooperate'.
- This lack of engagement led to substantial alterations to the Green Belt boundary when the housing need could have potentially been met in neighbouring authorities.
- There was no possibility to remediate to the lack of cooperation under the Duty to Cooperate as this was a requirement of the plan preparation phase, which finished when the plan was formally submitted for examination.

St Albans formally withdrew their Publication Draft Local Plan in November 2020 and have begun the journey of preparing a new Local Plan again.

A new Local Development Scheme was published in January 2021. This identifies that the council will draft a new Local Plan from December 2020 with the aim to publish a draft for Regulation 18 consultation in January/February 2022. This study will form part of the evidence base for the new Local Plan.

A.1.5 Planning Practice Guidance

The national Planning Practice Guidance (PPG) provides guidance on the requirements of the planning system. The PPG provides limited guidance in relation to Green Belts – it contains no guidance on how to conduct a Green Belt review, including a washed over village assessment, per se. However, relevant to assessing Green Belt performance, including washed over village status, it

provides guidance on the assessment of openness. The PPG sets out that openness is capable of having both spatial and visual aspects- in other words, the visual impact of development is relevant, as well as its volume.

The PPG provides guidance on how Local Plans might set out policy on compensatory improvements to offset loss of Green Belt, and critically how the planning authority can secure compensatory improvements. It states that compensatory improvements to the environmental quality and accessibility of Green Belt land should be informed by supporting evidence on landscape, biodiversity or recreation. Examples of such improvements include:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision. (PPG, paragraph 002, reference id: 64-002-20190722).

A.1.6 Planning Advisory Service Guidance

The Planning Advisory Service (PAS) published guidance[41] for Green Belt Assessment. Emphasis is placed on the need for assessment against the five purposes of the Green Belt in the first instance. The guidance acknowledges that there are planning considerations, such as landscape quality, which cannot be a reason to designate an area as Green Belt, but that could be a planning consideration when seeking suitable locations for development.

The guidance outlines considerations to be made in relation to the five purposes as set out below:

- Purpose 1: to check the unrestricted sprawl of large built up areas –consider the meaning of sprawl compared to 1930s definition, and whether positively planned development through a local plan with good masterplanning would be defined as sprawl.
- Purpose 2: to prevent neighbouring towns from merging into one another - the purpose does not strictly suggest maintaining the separation of small settlements near to towns. The approach will be different for each case. The identity of a settlement would not be determined solely by the distance to another settlement; the character of the place and of the land in between must be taken into account. A ‘scale rule’ approach should be avoided. Landscape character assessment is a useful analytical tool for this type of assessment.
- Purpose 3: to assist in safeguarding the countryside from encroachment –Seemingly, all Green Belt achieves this purpose. The recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open, accounting for edges and boundaries.
- Purpose 4: to preserve the setting and special character of historic towns - it is accepted that in practice this purpose relates to very few settlements as a result of the envelopment of historic town centres by development.

[41] PAS (2015) Planning on the Doorstep: The Big Issues

- Purpose 5: to assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of potentially developable land within urban areas must have already been factored in when Green Belt land was initially identified. It is considered that all Green Belt achieves this purpose to the same extent, and that the Green Belt value of parcels when assessed against purpose 5 is unlikely to be distinguishable.

The NPPF requires local planning authorities to work collaboratively on strategic matters that cross administrative boundaries (paragraph 24). The PAS guidance recognises that Green Belt is a strategic policy and hence a strategic matter in terms of the duty to cooperate.

A.2 Legal Precedents

A.2.1 Planning Appeals

It is useful to examine case law as it provides guidance on the interpretation of key terms / concepts within the NPPF. It is important to consider the impact of these judgements on Green Belt assessment methodologies and interpretation of assessment since Inspectors may consider this at Independent Examination– as was the case in North Herts, where the council was asked to review Green Belt outcomes with respect to recent judgements (see North Herts, Table A.1)

A.2.1.1 Openness

There have been various appeals that have highlighted the important considerations surrounding the interpretation of 'openness of the Green Belt' and are therefore relevant to the assessment of the land against Green Belt purposes (in particular purpose 3).

The Turner judgement (2016) [42] highlighted important considerations surrounding the openness of the Green Belt. The judgment states that the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Greenness is also a visual quality, and the preservation of the visual openness should also be considered.

> 'There is an important visual dimension to checking "the unrestricted sprawl of large built-up areas" and the merging of neighbouring towns, as indeed the name "Green Belt" itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside, and "safeguarding the countryside from encroachment" includes preservation of that quality of openness. The preservation of "the setting … of historic towns" obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields.'

Appeal cases in Three Rivers[43] and Cheshire West and Chester[44] further highlight the need to carefully consider 'openness'. In the former case, the Inspector concluded the proposal for three dwellings should be allowed as it constituted limited infill development in a village and as appropriate Green Belt development, the impact of the proposal on openness did not need to be assessed; however, that being said, the Inspector concluded that, regardless, any possible impact on openness would be offset by the removal of an existing structure with a similar footprint to the proposed development.

> 'I therefore conclude that the proposal would constitute limited infill within a village and would therefore not be inappropriate development within the Green Belt. Accordingly, there is no need to examine if very special circumstances exist to outweigh any harm arising from inappropriateness. …
>
> In view of my finding that the proposal is not inappropriate development, the impact on openness does not fall to be formally considered, but the impact of proposal on the openness of the Green Belt would be offset to a large degree by the removal of the barn that has a similar footprint to the proposed houses.'

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[42] Turner v Secretary of State CLG and East Dorset Council (2016) *EWHC 2728 (Admin)*

[43] Planning Inspectorate (2018) *Appeal Ref: APP / P1940/W/17/3183388* – Clovercourt Ltd v Three Rivers District Council

[44] 17 The Planning Inspectorate (2018) *Appeal Ref: APP/ A0665/ W/ 17/ 3190601* – Clegg v Cheshire

The case in Cheshire concerned plans for a new home to be developed on previously developed Green Belt land. The site concerned was a builder's yard on the edge of washed-over village. The Inspector concluded that it could not be considered infill development, given that it was widely spaced from neighbouring houses and has frontages onto different roads. Further the development would urbanise the site and its surroundings, thereby diminishing the openness of Green Belt. The appeal was accordingly dismissed.

> 'Indeed, in line with the 2016 Turner v Secretary of State and East Dorset Council judgement the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Such an approach would be far too simplistic and ignore the wider aspects of openness which goes beyond the physical effect of buildings or structures. Factors relevant include how built up the Green Belt is now and how built up would it be after development has taken place. Consequently, although it may be accepted that the proposal to redevelop a brownfield site may result in a reduced volume and footprint compared to the buildings and structures currently in place, there are wider factors that must be taken into account in defining the effect of the proposal on openness.
>
> In assessing the matter of openness there are a number of ways of determining whether there would be encroachment into the Green Belt. The effect of development as encroachment on the countryside may be in the form of loss of openness or intrusion. The Framework identifies that openness is an essential characteristic of the Green Belt.'

The Secretary of State[45] approved plans to build a replacement secondary school and new homes on Green Belt land east of Guildford, after ruling that 'very special circumstances' had been demonstrated. He agreed with the Inspector that the scheme represented a significant development in the Green Belt which would, inevitably and significantly reduce its openness and would erode the open context of the village. Noting the substantial harm to the Green Belt, he ruled that the provision of new housing and a new school carried greater weight.

The Inspector's note[46] for this appeal highlighted some key considerations in relation to Green Belt, which are relevant to this assessment:

- The two essential attributes of the Green Belt are its permanence and openness, in line with NPPF (paragraph 137).
- The key element to assess is the effect that a development has on the openness of the Green Belt.
- The 'concept of 'openness' is generally considered to be land being free from built development.'
- Although openness should be assessed on an individual site / area basis, the cumulative impact on the Green Belt of development on adjacent sites / areas should be considered.

The Supreme Court in R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] UKSC 3[47] has recently provided important clarity as to the interpretation of the openness of the Green Belt and the relationship between 'openness' and 'visual impact' within the planning judgement of the decision maker. The judgment highlighted the important distinction in planning decisions between planning judgement and legal interpretation of planning policy. While visual impact may in the context of a particular case be judged a relevant factor by a decision

[45] Ministry of Housing, Communities and Local Government, Secretary of State (2018) Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd and The Howard Partnership Trust

[46] The Planning Inspectorate (2017) Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098

[47] Further information available here: https://www.supremecourt.uk/cases/uksc-2018-0077.html

maker in assessing openness of the Green Belt it, in itself, will not be a strict nor mandatory determinative factor.

On the interpretation of 'openness' and the issue of 'visual impact' it was noted that:

> 'The concept of "openness" in para 90 of the NPPF [now para 150] seems to me a good example of such a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: "to prevent urban sprawl by keeping land permanently open …". Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As PPG2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development.'

Importantly, the Supreme Court re-enforced the importance of planning judgement within the role of the decision maker by stating:

'[Openness] is a matter not of legal principle but of planning judgement for the planning authority or the inspector.'

A.2.1.2 Washed Over Villages

There is limited case law relating to decisions around insetting of washed over villages. However, there have been some legal cases, which assist when considering how to assess washed over villages, in particular the definition and extent of a village.

There is no definition within the NPPF as to what constitutes a 'village'. In a 2019 appeal, an Inspection referred to the Oxford English Dictionary definition of a "village" as a group of houses and associated building, smaller than a town, situated in a rural area. The definition is extended to areas in cities or towns that have features characteristic of village life.[48]

It is important that careful consideration is given to the identification / definition of villages. In an appeal case in 2018, an inspector allowed three homes as 'village infilling' in the Three Rivers Green Belt, ruling that the settlement size was not relevant since the NPPF does not specify any limitations regarding size[49]. Rather the question of whether a settlement is a village is a question of planning judgement. In this instance the settlement, Abbots Langley, was 'defined by its extensive boundaries with open countryside,' a characteristic common to villages and is also referenced as a village within the settlement and on the council's website. For these reasons, Abbots Langley was ruled to be a village.

In another appeal case in 2019, an inspector rejected four homes proposed as 'village infilling' in a small settlement in Staffordshire green belt, ruling that it could not be considered a village because it did not have a church.[50] The settlement was judged to be no more than a hamlet and therefore it was judged that the proposal did not accord with the exception in Framework 145 (e).

While in 2018 an inspector approved plans for a new two-storey home as limited infilling in a washed over village near Solihull, referencing a 2015 court ruling that a 'common sense' approach

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[48] This point is made in Paragraph 11 of the judgement by Centaur Homes against the decision of Cheltenham Borough Council (July 2019). Further information available here: Reference: APP/B1605/W/19/3225401 https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3225401&CoID=0

[49] These points are made in Paragraphs 7 and 8 of the judgement. Rory MacLeod, The Planning Inspectorate (2018) Appeal Ref: APP/P1940/W/17/3183388 Land adjoining 1 Cecil Lodge Cottage, Bedmond Road, Abbots Langley, Herts WD5 0QB Further information available here: https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3183388&CoID=0

[50] This point is made in Paragraph 4 of the judgement in A J Beaman Construction Ltd against the decision of Staffordshire Moorlands District Council (January 2019). Further information available here: APP/B3438/W/18/3211000 https://acp.planninginspectorate.gov.uk/ViewCase.aspx?Caseid=3211000&CoID=0

should be taken regarding the physical extent of villages)[51]. In the case, the inspector made clear that "a common sense, 'on the ground' view should be taken. On a visit to the appeal site, the inspector noted that despite sitting beyond its settlement boundary, the street is "visually and physically joined" to village, with nothing to clearly separate it. On this basis he considered it would be "perverse" to allow infilling in some smaller villages washed over by the green belt, but not in "a ribbon of development which extends out from a large and sustainable settlement". The appeal was therefore allowed.

A.2.2 Independent Examinations

As set out in the Stage 1 GBR, Local Plan Examination Inspector's Reports provide useful pointers on the implications of national policy. At the time of the Stage 1 GBR, Inspectors Reports focussed on recommendations for undertaking comprehensive Green Belt Reviews. Subsequent to this more recent Independent Examinations of Local Plans have focused on more detailed points regarding the methodology employed within such studies.

A.2.2.1 Cheshire East[52]

The lessons learnt are provided by the Inspector's views at the different stages of the Local Plan Strategy Examination, as set out below.

Interim Views (October 2014)[53]

The Inspector identified several flaws in the overall approach to the Green Belt Assessment, including:

- There were several cases where the Green Belt assessment does not support the release of specific sites from the Green Belt and the review appears to have given greater weight to other factors, such as land ownership, availability and deliverability when preparing and finalising the Plan.
- There is inconsistency in the scale of the parcels assessed, in that, very large tracts of land have been assessed against smaller sites and some very small areas of land have been omitted.
- The review does not consider all the purposes of the Green Belt, omitting the contribution to urban regeneration and preserving the setting and special character of historic towns. Although the latter purpose may apply only to historic towns like Chester, the impact on urban regeneration does not seem to have been assessed.

Further Interim Views (December 2015)[54]

Following the Green Belt Assessment Update (GBAU), the Inspector published his further interim views. Paragraphs 41-46 discuss the Green Belt Assessment Update. The Inspector noted that the independent two stage assessment of general areas followed by smaller parcels, assessing the

[51] This point is made in Paragraph 7 of the case of Penrow Developments Ltd against the decision of Solihull Metropolitan Borough Council (2018). Further information available here: Reference APP/Q4635/W/17/3191758 https://acp.planninginspectorate.gov.uk/ViewCase.aspx?CaseID=3191758&CoID=0

[52] Stephen Pratt, The Planning Inspectorate (2017) Report on the Examination of the Cheshire East Local Plan Strategy Development Plan Document

[53] Stephen Pratt, The Planning Inspectorate (2014) Appendix 1 – Inspectors interim views and clarification (6 & 28/11/14) Available at: https://moderngov.cheshireeast.gov.uk/documents/s57237/Appendix%201a%20Inspectors%20Interim%20Views.pdf

[54] Stephen Pratt, The Planning Inspectorate (2015) Inspector's further interim views on the additional evidence produced by the council during the suspension of the examination and its implications for the submitted local plan strategy. Available at: http://cheshireeast-consult.limehouse.co.uk/file/3720251

relative significance of the contribution of each parcel against the five purposes of Green Belt followed by an overall assessment enabled a comprehensive, consistent and proportionate approach to be taken. He notes that only 'Green Belt factors' are assessed without potential areas for development thus providing a key input into the site selection process:

> '…the approach set out in the GBUA seems to reflect national policy and address most of the shortcomings of the previous Green Belt assessment. It provides a set of more comprehensive and proportionate evidence to inform, rather than determine, where the release of Green Belt land may be necessary at the site-selection stage.' (paragraph 46)

The Inspector dismisses participants concerns relating to boundary definition noting that

> '…in most cases, "strong" boundaries have been used, taking account of established physical features and committed new road schemes, where appropriate; the size of most of the larger land parcels has been reduced, with a 5ha indicative threshold for strategic sites, and detailed points about specific land parcels, including the identification of smaller and larger sites, can be reconsidered at the site-selection stage.' (paragraph 44)

The Inspector acknowledges the complexity of the process and the involvement of professional judgements. He emphasises the needs for consistency and transparency using available and proportionate evidence:

> "This is a complex process, which needs to be undertaken in a consistent and transparent manner using available and proportionate evidence, involving professional judgements; it was not simply a desk-based study, but one which involved many site visits by CEC's officers or consultants to confirm the assessments and judgements. More particularly, the GBAU is the only comprehensive evidence which assesses all potential land parcels on an objective, consistent and comprehensive basis." (paragraph 44)

In relation to the inclusion of purpose 4, the Inspector comments:

> 'The assessment utilises a variety of historical evidence, which enables a full assessment of the smaller settlements; this could be criticised as being too detailed for a Green Belt assessment which focuses on the larger historic towns, but is not necessarily inappropriate or irrelevant' (paragraph 45)

He notes that the assessment of purpose 5

> '…largely focuses on brownfield sites within the nearest settlement and enables a differentiation between settlements to be made and provides a consistent, transparent and proportionate approach to this element of the assessment; the focus on regeneration issues internal to Cheshire East reflects the views of the Greater Manchester authorities. The overall assessment involves matters of judgement and confirms that each purpose was given equal weighting and provides the reasons for the overall assessment.' (paragraph 45)

Interim Views on the Further Modifications (December 2016)

The Inspector did not provide any further comments on the Green Belt methodology however reiterated his comments made in December 2015 supporting the approach and methodology taken.

A.2.2.2 Welwyn Hatfield (2017)[55]

Inspector's Note Following Stage 1 and 2 of hearing sessions: Green Belt Review

The Inspector stressed the need to ensure sufficient granularity in identifying land parcels in a Stage 2 Assessment; the importance of assessing openness as opposed to landscape; the need for

[55] Mel Middleton, Inspector (December 2017) *Welwyn Hatfield Local Plan Examination Green Belt Review*

assessments to consider local circumstances when determining essential areas to retain and preserving settlement gaps; queried whether local considerations, if used, should be accorded the same weight as the NPPF purposes; and advocated that it is pointless to carry out Green Belt Assessment for sites affected by major policy constraints.

> [The Local Plan development strategy is not sound], 'in part because there was insufficient justification for the failure to identify sufficient developable sites within the Green Belt. This is largely because the phase 1 Green Belt Review was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas. …… Additionally, the phase 2 Green Belt Review, which did look at a finer grain of sites, does not appear to have examined all of the potential development sites adjacent to the urban areas.
>
> Furthermore that study, which combined a more refined examination, of the contribution that sites made to Green Belt purposes, with an overall examination of development considerations, appears to have incorporated an examination of landscape character into the consideration of openness. Openness considerations in a Green Belt context should only be concerned about the absence of built development and other dominant urban influences. They should not be concerned about the character of the landscape.
>
> …..
>
> There must be a limit beyond which the development of undeveloped land between settlements, be they neighbouring towns or nearby smaller settlements, should not proceed. Exactly what that is in terms of distance is debatable and it could well be different in the context of the merging of neighbouring towns to the context of maintaining the settlement pattern. I note that the Council has referred to a kilometre, whereas other studies have used a mile and even five kilometres in the context of neighbouring towns. What is significant however is perception and a kilometre gap with limited development in a landscape of rolling topography, where the settlements are not visible one from the other, is probably more valuable than five kilometres in flat country with more sporadic urban development in between and such that the settlements are clearly visible one from the other.
>
> …..
>
> There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites however they are defined'

Inspector's Interim findings on the Examination of the Local Plan

Post Stage 3 Hearing Sessions

It was discussed that rural roads cannot be used as a reason to omit GB sites just because they will inevitably increase capacity on rural roads.

Stage 5 Hearing Session Green Belt: Round Up Session

The inspector confirmed the revised methodology to be appropriate. He felt that it would be helpful for decision making if the text were clarified in places to provide greater detail on how the study was undertaken. For example, it could be used to clarify how harm assessments were concluded. The Inspector also noted that there should be an agreed approach to the shared Green Belt between Hatfield and St Albans. In terms of how harm assessment should be used, the Inspector considered that it should not be ignored that previously development land and land in close proximity to

transport nodes (railway stations) should be prioritised, but also that sites assessed as high harm sites should not be excluded from that consideration.

The Inspector also set out that consideration need to be given to the permanence of the Green Belt boundaries beyond the plan period. The Inspector also considered that there was not a requirement in the NPPF to identify Safeguarded Land, although this would be ideal. He confirmed that it was up to the Council to consider.

On washed over settlements, the Inspector considers the work done as sound. It was therefore left to the Council to consider whether to take forward the recommendations as to which settlements to remove from the Green Belt.

A.2.2.3 Redbridge (2018)[56]

The Inspector emphasised that a Green Belt Review should focus on assessing the Green Belt against the NPPF purposes. Where no historic towns exist, it is reasonable to exclude purpose 4 from an assessment. Further, although purpose 5 is not particularly useful for evaluating sites, the rationale expressed for leaving out this purpose must be robust.

> 'The assistance the Green Belt gives to urban regeneration is assumed to be nil because all brownfield sites with reasonable prospects of development have been identified. That view is flawed as a matter of principle because the aims of the Green Belt are long term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites.'

A.2.2.4 Wycombe (2019)[57]

The Inspector indicated support for the Green Belt assessment method, as being consistent with the requirements of the NPPF.

> '93. As such, I am satisfied that both the Green Belt Assessments, as they relate to Wycombe District, provide a sound and robust evidence base which are consistent with the requirements of the NPPF and afford a basis for the enduring Green Belt boundaries shown on the policies map.'

A.2.2.5 Runnymede (2020)[58]

The Inspector described the Green Belt review as 'comprehensive, systematic and based on a robust, consistently applied methodology that properly reflected local circumstances and the unique characteristics of the borough.' The Inspector commended the staged approach to assessment and the fact that the process took account of good practice advice and experience elsewhere.

> '68. The Green Belt review was undertaken as a series of complementary studies and carried out in stages that examined it first at a strategic level, and then at a more fine-grained level to assess the performance of smaller parcels of land against Green Belt purposes; the studies also included a Green Belt Villages review and a technical review of the Green Belt boundaries. The overall process took account of good practice advice from the Planning Advisory Service, comparator studies carried out by other local planning authorities whose plans were found sound, and Landscape Institute advice on landscape visual assessment.
>
> I consider the robustness of the Green Belt review and the justification for the proposed release of land in more detail in Issues 3 and 4 below in relation to the Plan's site allocations. In summary, I

[56] David Smith, Inspector, (24 January 2018), Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030

[57] Nicola Gulley (2019) Report on the Examination of the Wycombe District Local Plan

[58] Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

have concluded that the review was comprehensive, systematic and based on a robust, consistently applied methodology that properly reflected local circumstances and the unique characteristics of the borough in assessing how the Green Belt serves the purposes laid down in national planning policy.

69. The review responds to the Council's strategy to only consider sites for release from the Green Belt that can be shown to perform most weakly against the purposes of including land within it. This is a justified approach which is consistent with national planning policy by ensuring that maximum protection is given to the Green Belt. And in this and all other respects, I have concluded that the approach to the Green Belt review and the basis on which the Council selected the Plan's spatial strategy accords with the Calverton judgement.

70. Furthermore, the methodology was developed in a systematic and rigorous way, working with the surrounding local planning authorities and taking account of responses to the published evidence and the Issues, Options and Preferred Approaches consultation (Regulation 18). The assessment criteria and scoring matrices are clearly explained and justified and the scores for each Green Belt purpose were rightly considered individually, given the importance of understanding the roles that different areas of land play in serving particular purposes at the strategic and local scales.

71. Purposes 4 and 5 as set out in paragraph 80 of NPPF [now paragraph 138] were excluded from the assessment for good reason; purpose 4 is not relevant to Runnymede and the settlements immediately beyond the borough's boundaries, and purpose 5 applies to all parts of the Green Belt to the same extent and has already been taken into account before identifying any potential need to release land from the Green Belt. And as part of the more fine-grained assessment carried out in the Stage 2 review, the definition of buffers around settlements was carefully considered, informed by the nature of the borough's Green Belt, and was a proportionate, suitably focused and justified approach.

72. The review did not seek to balance Green Belt purposes with other sustainability objectives; correctly, the Council considered the balancing exercise within the wider context of all the site selection evidence, and it has set out its reasons for selecting the allocations in the Site Selection Methodology Assessment (SSMA). In a very limited number of cases the Council disagreed with the recommendations of the Green Belt review, which was carried out by consultants, and its reasons for doing so are explained in the SSMA. Based on all the evidence and my site visits, I have found that the Council's conclusions are reasonable and justified.'

A.2.2.6 York [59]

The Inspectors initial observations of the proposed Local Plan were that it was 'not clear… how the Council has approached the task of delineating the Green Belt boundaries' and 'no substantive evidence has been provided setting out the methodology used and the decisions made through the process.'

Following the phase one hearings, the Inspectors described the approach taken to delineating the proposed Green Belt boundaries as 'far from straightforward' and considered that a 'simpler methodology could have avoided some of the concerns' raised.

'48. Given our views set out above, we consider that there are elements of the approach taken to delineating the Green Belt boundaries that are not adequately robust. Indeed, in our opinion, there are intrinsic flaws embedded in the methodology. Consequently, whilst as detailed in paragraph 29 above we are satisfied that the boundaries are, as a matter of broad principle at least, in general conformity with the RSS, we have serious concerns about the justification for the precise Green Belt boundaries proposed in the Local Plan, particularly in terms of their consistency with the NPPF.

[59] Simon Berkeley and Andrew McCormack, Inspectors (12 June 2020), Letter to the City of York Council on the Examination of the City of York Local Plan ; Simon Berkeley and Andrew McCormack, Inspectors (24 July 2018), Letter to the City of York Council, Examination into the soundness of the city of York Local Plan

49. We are not currently in a position to conclude on the soundness of the Local Plan in relation to this issue. This is because we have not scrutinised the Green Belt boundaries proposed in detail through hearing sessions. As such, we are currently unclear about precisely how, or the extent to which, the flawed elements of the methodology have influenced the outcome. As a consequence, we cannot presently tell whether the Green Belt boundaries proposed in the Local Plan are sound. However, we have concerns that they may not be because of the shortcomings of the methodology.'

A.3 Experience Elsewhere

In the absence of specific guidance to carry out Green Belt reviews, it is helpful to consider experience elsewhere to identify potential good practice. It should be noted that the timescales for undertaking some of the studies pre-date the (latest) NPPF, whilst others have not been subject to Independent Examination. In identifying good practice from the approaches adopted by other authorities, these factors should be taken into account to ensure the methodology adopted is sound and reflects the latest requirements of the 2021 NPPF.

A.3.1 Green Belt Evidence Base

Local authorities take a variety of approaches to their Local Plan evidence bases, as can be seen in Table A.1, which provides an overview of Green Belt Evidence Bases undertaken by neighbouring authorities to St Albans and elsewhere. The evidence bases all comprise a series of stages, covering some or all of the following:

- Strategic level assessment
- Spatially focused / local level assessment
- Washed over villages assessment
- Boundary review
- Promoted site / proposed allocations boundary review
- Exceptional circumstances review

Key points to note:

- Consistency of approach across the different stages is necessary in developing a robust evidence base to support a Local Plan
- Consideration of NPPF Green Belt purposes and requirements at all stages

Table A.1 Green Belt Evidence Bases

Local Authority	Newest Local Plan Status	Green Belt Studies	Inspectors Report
Hertfordshire			
Broxbourne	Adopted (2020)	Review of the Inner Boundary of the Green Belt (Prospect Planning, 2008) Green Belt Review (Scott Wilson, 2008) Green Belt Exceptional Circumstances (2016) Green Belt Topic Paper (2017)	Focuses on strategic and site level exceptional circumstances case. Does not comment on the Green Belt methodology per se.[60]
Dacorum	Emerging Strategy for Growth – consultation closed Feb 21. Now further information gathering relating to Local Plan – particularly in relation to Green Belt.	Green Belt Review Stage 1 (SKM, 2013) – strategic level assessment Green Belt Review Stage 2 (Arup, 2016) – spatially focused assessment, constraints and landscape appraisal Green Belt Review Stage 3 (Arup, 2020) – promoted site/ proposed allocations boundary review Green Belt Topic Paper (2020) – exceptional circumstances and other Green Belt policy considerations	n/a
East Herts	Adopted (2018)	East Herts Green Belt Review (Peter Brett Associates, 2015) – strategic level assessment, excluding areas subject to absolute constraint	Focuses on exceptional circumstances case. Does not comment on the Green Belt methodology per se.[61]
Hertsmere	Stakeholder and development engagement. Publication of draft Local Plan timetabled for 2021	Green Belt Review Stage 1 (Arup, 2016) – strategic level assessment Green Belt Review Stage 2 (Arup, 2019/ 2020) – spatially focussed assessment Green Belt Review Stage 3 (Arup, 2020) – washed over village assessment Green Belt Review Stage 4 (Arup, 2021) – inset village boundary assessment (not yet published)	n/a
North Hertfordshire	Submitted for Examination in 2017 Main Modification hearings held Feb 21	Green Belt Review (NHDC, 2016) – strategic review, refined review, washed over / inset village assessment and assessment of potential development sites Green Belt Review Update (NHDC, 2018) – update to take explicit account of proposed development on visual dimension of openness in addition to the spatial dimension in direct	n/a

[60] William Fieldhouse, The Planning Inspectorate (2020) Report on the Examination of the Broxbourne Local Plan

[61] Christine Thorby, The Planning Inspectorate (2018) Report on the Examination of the East Herts District Plan 2011-2033

Local Authority	Newest Local Plan Status	Green Belt Studies	Inspectors Report
	Inspector drafting report (Jan 22)	response to the Court of Appeal's judgment in Samuel Smith Old Brewery v North Yorkshire County Council [2018] EWCA Civ 489. Sam Smith Green Belt Note (NHDC, 2020) – note assessing the Green Belt evidence following the Supreme Court judgement. R (on the application of Samuel Smith Old Brewery (Tadcaster) and others) (Respondents) v North Yorkshire County Council (Appellant) [2020] UKSC 3 - concluded no further change necessary	
Stevenage	Adopted (2019)	Green Belt Review Phase I (AMEC, 2013) – strategic level assessment of the entirety of Green Belt in the vicinity of Stevenage, including within neighbouring authority Green Belt Green Belt Review Phase II (AMEC, 2015) – assessment of Potential Development Areas against Green Belt purposes, identifying indicative development capacity, constraints and sustainability issues Technical Note: Review of the Green Belt around Stevenage (AMEC) – additional parcel assessments Green Belt Technical Paper (SBC, 2015) – exceptional circumstances	Provides a summary of the Green Belt Review but does not include any commentary on the methodology per se. Considers exceptional circumstances case both at a strategic level and for each proposed change. [62]
Three Rivers	Further round of Reg 18 consultation scheduled May/ July 2021. Next stage of consultation November/December 2022.	Green Belt Stage 1 Assessment (Amec, 2017) – strategic level assessment and washed over village/ insetting assessment Green Belt Stage 2 Assessment (LUC, 2019) – spatially focussed assessment	n/a
Watford	Submitted for Examination in August 2021. Examination January 2022	Green Belt Stage 1 Assessment (Amec, 2017) – strategic level assessment and washed over village/ insetting assessment Green Belt Stage 2 Assessment (LUC, 2019) – spatially focussed assessment	n/a
Welwyn Hatfield	Submitted for Examination in 2017	Green Belt Review (SKM, 2013) – strategic level assessment Green Belt Review Stage 2 (WHBC, 2014) – local assessment Topic Paper Green Belt (WHBC, 2017) – exceptional circumstances, assessment of impact on Green Belt, Green Belt boundaries	At the end of Stage 2 hearings (2017), the Inspector identified a need for further work

[62] Louise Crosby, The Planning Inspectorate (2017) Report on the Examination of the Stevenage Borough Local Plan 2011-2031

Local Authority	Newest Local Plan Status	Green Belt Studies	Inspectors Report
	Commencement of Main Modifications Feb 2022.	Welwyn Hatfield Green Belt Study Stage 3 (LUC, 2018) – strategic assessment of Green Belt, washed over village assessment, assessment of new settlement potential LUC Green Belt Study Stage 3 Final Report (LUC, 2019) – updated previous report to provide further clarification following questions raised at Examination hearings	on the Green Belt evidence[63]. In response, a further study was commissioned. Inspector concluded at the end of hearings in November 2018 that the revised Green Belt study methodology was robust.[64]
Other Nearby Authorities			
Aylesbury Vale	Vale of Aylesbury Local Plan (adopted September 2021)	Buckinghamshire Green Belt Assessment (Arup, 2016) – strategic assessment Aylesbury Value Green Belt Assessment (AVDC et al, 2016) – spatially focussed assessment	Focuses on exceptional circumstances case. Does not comment on the Green Belt methodology per se.
Central Bedfordshire	Central Bedfordshire Local Plan (adopted July 2021)	Central Bedfordshire and Luton Green Belt Study (LUC, 2016) strategic assessment, washed over village assessment and spatially focused assessment	Focuses on the strategic and site level exceptional circumstances case. It explicitly notes that the assessment of washed over villages is a robust and comprehensive, however does not comment on the Green Belt assessment methodology per se. [65],
Chiltern District Council and South Bucks District Council	Plan withdrawn from examination following the creation of new unitary authority	Buckinghamshire Green Belt Assessment (Arup, 2016) – strategic assessment Strategic Role of the Metropolitan Green Belt in Chiltern and South Bucks, (Arup, 2018) – strategic assessment Inner Green Belt Review (CDC & SBDC, 2019) – boundary review Green Belt Assessment Part 2 (CDC & SBDC, 2019) – spatially focussed assessment Review of Settlements within the Green Belt (CDC & SBDC, 2019) – washed over village review Green Belt Exceptional Circumstances Report (2019) – strategic and site level case	n/a
Luton	Adopted (2017)	Central Bedfordshire and Luton Green Belt Study (LUC, 2016) strategic assessment, washed over village assessment and spatially focused assessment	Does not comment on the Green Belt methodology per se. Focus on the timing of Green Belt assessments within the surrounding districts and boroughs with

[63] Melvyn Middleton, The Planning Inspectorate (2017) Report on the Examination of the Welwyn Hatfield Local Plan (2013-2032): Green Belt Review

[64] Melvyn Middleton, The Planning Inspectorate (2018) Report on the Examination of the Welwyn Hatfield Local Plan (2013-2032)

[65] Matthew Birkinshaw & Helen Hockenhull, The Planning Inspectorate (2021) Report on the Examination of Central Bedfordshire Local Plan

Local Authority	Newest Local Plan Status	Green Belt Studies	Inspectors Report
			regards to the development of the spatial development strategy.[66]
South Cambridgeshire	Issues and options	New Green Belt evidence in production	n/a
Wycombe	Adopted (2019)	Buckinghamshire Green Belt Assessment (Arup, 2016) – strategic assessment Green Belt Part Two Assessment (WDC, 2017) - – spatially focussed assessment	Inspector notes that the approach to Green Belt review was acceptable. Considers exceptional circumstances case both at a strategic level and for each proposed change. [67]
Authorities Elsewhere			
Guildford	Adopted (2019)	Guildford Borough Green Belt and Countryside Study (Pegasus, 2013)	Inspector comments that the Green Belt review is comprehensive and well founded. Considers exceptional circumstances case both at a strategic level and for each proposed change. [68]
RBWM	Submitted for Examination 2018, Major Modification stage	Green Belt Boundary Study (RBWM, 2013) – boundary assessment Green Belt Purpose Analysis (RBWM, 2013) – strategic assessment Edge of Settlement Analysis Part 1; Green Belt Purpose Assessment (RBWM, 2016) – Green Belt performance assessment – spatially focussed assessment Edge of Settlement Analysis Part 1: Constraints, Opportunities and Delivery Assessment (RBWM, 2016) – suitability assessment of least performing Green Belt	n/a
Runnymede	Adopted (2020)	Green Belt Review Part One (Arup, 2014) – strategic assessment Green Belt Review Part Two (Arup, 2017) – spatially focussed assessment Green Belt Villages Review Stage 1 & 2 (RBC, 2018) – washed over village assessment Green Belt Boundary Technical Review (RBC, 2016) – boundary assessment Exceptional Circumstances (RBC, 2018) – exceptional circumstances case	Inspector's report reviews and commends Green Belt Review methodology. Considers exceptional circumstances case both at a

[66] Jeremy Youle, The Planning Inspectorate (2017) Report on the Examination of the Luton Local Plan

[67] Nicola Gulley, The Planning Inspectorate (2019) Report on the Examination of the Wycombe District Local Plan

[68] Jonathan Bore, The Planning Inspectorate (2019) Report on the Examination of the Guildford Borough Local Plan: Strategy and Sites

Local Authority	Newest Local Plan Status	Green Belt Studies	Inspectors Report
			strategic level and for each proposed change.[69]

[69] Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

A.3.2 Stage 2 GBR Methodology

Table A.2 provides a summary of Stage 2 Green Belt reviews undertaken by authorities neighbouring St Albans and elsewhere, and a brief overview of the methodology taken, including for the identification of sub-areas.

Key points to note:

- Local authorities have taken a variety of approaches but there is a significant degree of commonality across studies.
- Stage 2 reviews are preceded by a strategic level Green Belt analysis which comprehensively considered all Green Belt designated land.
- Stage 2 reviews are spatially granular assessment, typically assessing weakly performing Green Belt identified in Stage 1 and promoted sites / buffers around existing urban areas.
- Land subject to major policy constraints is removed from consideration.
- Green Belt is assessed against the NPPF purposes although purpose 5 is excluded from assessment as all parcels make an equally significant contribution to this purpose.
- Not all authorities assess against purpose 4. The inclusion or otherwise depends on the local historic context. For example, Dacorum, Welwyn Hatfield and St Albans share a Stage 1 GBA, however, while Welwyn Hatfield includes purpose 4 in its Stage 2 assessment as Welwyn Garden City is considered is historic town; Dacorum excludes purpose 4 as there are no instances in Dacorum where historic towns/cores directly abut the Green Belt and where the Green Belt played a functional role in the setting of such historic settlements; nor are there any settlements with clear historical status across a wide area.
- A variety of scales, from three to seven points, are used to assess performance.
- Assessments consider the presence or otherwise of Green Belt boundaries that are likely to be permanent and readily recognisable.
- Some authorities include wider impact assessments, which consider the role of the sub-area within the wider Green Belt, cumulative impact on neighbouring sub-areas and cross-boundary impacts.
- Reviews present overall recommendations suggesting whether, or not, the sub-area should be considered further.

Table A.2 Green Belt Review Experience Elsewhere

Local Authority	Study (Date, Author)	Summary of Approach	Sub-area Identification
Neighbouring Authorities			
Central Bedfordshire	Central Bedfordshire and Luton Green Belt Study (LUC, 2016)	The study was formed of two stages. The first was the strategic level assessment, which reviewed all Green Belt land using a five-point scale (strong, relatively strong, moderate, relatively weak contribution, or weak/no contribution) against NPPF purposes 1-4. Purpose 5 was excluded from the assessment as all parcels make an equally significant contribution to this purpose. The stage two assessment considered areas identified as performing relatively weakly against Green Belt purposes in the Stage 1 assessment. Site visits were undertaken to verify and expand where necessary the desk-based assessments of the weakly performing areas in Stage 1; and also, to identify alternative permanent and readily recognisable Green Belt boundaries. The presence of environmental constraints within the sites was noted although not taken into consideration within the assessment itself. The stage 2 assessment pro forma provide a description of the parcel including its boundary edges and present a conclusion on the contribution that the parcel makes to Green Belt purposes. The method statement does not explicitly specify how the overall contribution was determined from the assessment description. The overall contribution was assigned using a five-point scale (strong, relatively strong, moderate, relatively weak contribution, or weak/no contribution).	Stage 2 assessed land identified as performing relatively weakly across all Green Belt purposes in Stage 1.
Dacorum Borough Council	Stage 2 Green Belt Review and Landscape Appraisal (2015, Arup)	The assessment considered performance of sub-areas against the purposes of the Green Belt as defined in the NPPF. The sub-areas were assessed using a five-point scale (strong/ very strong, relatively strong, moderate, relatively weak, weak / very weak) against a series of defined criteria purposes 1-3. Purpose 4 was excluded as no historic towns were identified in the borough and purpose 5 was excluded from the assessment as all parcels make an equally significant contribution to this purpose.	The study assessed three strategic and one small scale sub-areas that had been identified as weakly performing in the SKM Stage 1 Green Belt Review. The study also considered land parcels adjacent to existing urban areas of towns and large villages as defined in the Dacorum Adopted Core Strategy, as well as one settlement in the rural area. Boundaries for the assessment sub-areas were defined using defensible and permanent boundary features.

Local Authority	Study (Date, Author)	Summary of Approach	Sub-area Identification
		Following the purpose analysis, an absolute and non-absolute natural and historic environment constraints assessment was undertaken. Sub-areas heavily constrained by absolute constraints were recommended for retention within the Green Belt and no further assessment undertaken. In addition, sub-areas that met NPPF purposes strongly and fell within the Chilterns AONB were excluded from further assessment. The remaining sub-areas were then considered with regards to their landscape sensitivity, in terms of their ability to accommodate change in land use if released from the Green Belt. Finally, the remaining / refined sub-areas were reassessed against NPPF purposes 1-3. Defensible boundaries were identified as part of this final stage.	
Hertsmere Borough Council	Green Belt Assessment Stage 2 (2019, Arup)	The assessment considered performance of sub-areas against the Green Belt purposes 1-4 as set out in the NPPF (purpose 5 was excluded from the assessment as all parcels make an equally significant contribution to this purpose); and the role and importance of sub-areas in terms of their function within the wider Green Belt. A six- point scale (strong/ very strong, relatively strong, moderate, relatively weak, weak / very weak, none) was applied to the defined purpose assessment criteria. The sub-areas were categorised as performing strongly/ moderately/ weakly based on the highest score for any single purpose. The wider impact assessment considered the role of the sub-area within the Stage 1 General Area as well as the wider Green Belt. It also considered cumulative impact of neighbouring sub-areas, including where relevant cross-boundary parcels. The assessed areas were categorised based on their overall contribution important / partly less important / less important) to the wider strategic Green Belt. These two assessments were pulled together to reach an overall recommendation for each sub-area – i.e. recommended for further consideration / part recommended	This Stage 1 assessment stage identified areas for potential sub-division, which formed the starting point for defining sub-areas in this assessment. Parcels that were assessed as performing weakly in their entirety in Stage 1 were not considered further in Stage 2, as they had already been recommended for further consideration by Hertsmere Borough Council. In addition to these Stage 1 parcels, the study also considered land around the existing towns, larger villages and in the area proposed for garden villages to align with the development approaches being considered in the Council's Issues and Options Public Consultation Report. This included drawing on the Council's emerging Housing and Economic Land Availability Assessment (HELAA) site database. Land was excluded if: a) it did not fit with the proposed broad spatial approaches; b) it was not promoted and fell into land categorised as strongly performing in the stage 1 GBA; c) its development would lead to physical coalescence of non-Green Belt settlements; or d) it was entirely or largely constrained by major policy considerations (except in the case of garden village sites, where due to their size there may be scope for major policy constraints to be designed into the scheme or mitigated).

Local Authority	Study (Date, Author)	Summary of Approach	Sub-area Identification
		for further consideration / not recommended for further consideration. The relative strength of sub-area boundaries was also assessed to determine where mitigation might need to be secured if a sub-area was released in order to create a readily recognisable and likely to be permanent boundary.	Boundaries for the assessment sub-areas were defined using defensible and permanent boundary features.
North Hertfordshire District Council	Green Belt Review (2016, NHDC)	The study included a strategic assessment of the entirety of the Green Belt against the NPPF purposes, a more refined review of the Green Belt (the strategic parcels were subdivided into sub-parcels, again covering the entirety of the Green Belt), an assessment of Green Belt villages, an assessment of sites identified in the SHLAA that lie within the Green Belt and an assessment of potential additions to the Green Belt. The refined review assessed the sub-parcels against the Green Belt purposes 1-4 as set out in the NPPF (purpose 5 was excluded from the assessment as all parcels make an equally significant contribution to this purpose). A three-point scale (significant contribution / moderate contribution / limited contribution) was applied to the defined purpose assessment criteria and the overall evaluation / contribution. The method statement does not specify how the overall contribution was determined from the individual purpose assessments. The SHLAA potential development sites were also assessed against the Green Belt purposes 1-4. However, a different set of detailed criteria were used to assess the contribution individual sites can play in supporting Green Belt purposes. A numerical score (1-3) was attributed for each criterion. The overall contribution was judged on a three-point scale (significant contribution / moderate contribution / limited contribution). The method statement does not explicitly specify how the overall contribution was determined from the individual purpose scores. As part of the assessment, the review considers the boundaries that would result from potential allocation of any of these sites for development in the Green Belt.	The strategic and more refined assessment was carried out for the entirety of the Green Belt. The strategic land parcels were defined by roads, other clearly visible physical features in the landscape and existing Green Belt boundary. The more refined assessment sub-divided the strategic land parcels into sub-parcels. The approach for the sub-division is not explicitly stated in the report. However, from the sub-parcel 'sector' descriptions, it appears that roads, railway, Icknield Way Trail, footpaths, Luton airport runway, woodland and the district boundary were used to define sub-parcels. The sites assessed and their boundaries were as submitted for the SHLAA. However, in assessing whether boundaries were readily recognisable and likely to be permanent, strong boundary features were road, railway line and established hedgerow. Conversely, ditches, fences or footpaths were considered weak boundary features.

Local Authority	Study (Date, Author)	Summary of Approach	Sub-area Identification
Three Rivers Borough Council **Watford Borough Council**	Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough (2019, LUC)	This study followed a three-step process assessing: (1) impact of release on contribution to each NPPF purposes, (2) impact on integrity of adjacent Green Belt and boundaries, (3) overall harm. The parcels were assessed against NPPF Purposes 1-3, using a five-point scale (significant / relatively significant / moderate / relatively limited / limited or no impact). Purpose 4 was excluded as no historic towns were identified in the borough. Purpose 5 was excluded from the assessment as it was judged that Green Belt land will not make a significant contribution to purpose 5 given the relatively low quantum of brownfield land available in the two boroughs. Boundary features were considered to determine the extent to which adjacent land would incur loss of integrity through increased containment and / or loss of distinction between development and open land. A rating was given using a four-point scale (significant / moderate/ minor / no or negligible). Green Belt harm was rated using a seven-point scale (very high harm/ high harm/ moderate-high harm/ moderate harm / low-moderate harm/ low harm/ very low harm). The conclusions from the two previous steps were drawn together to reach the overall judgement. Professional judgement was used to consider the weight attached to each contributing factor and justification included within each pro forma.	This study assessed all land adjacent to the urban edges of inset settlements within and bordering the two districts. The land was subdivided into parcels by the boundaries used to define the Stage 1 parcels. Land subject to 'absolute' environmental constraints was excluded from assessment.
Welwyn Hatfield Borough Council	Green Belt Review: Stage 2 (2014, Jacobs)	The review assessed Green Belt against the NPPF Green Belt purposes 1-4, as well as a local purpose regarding maintaining the existing settlement pattern. Purpose 5 was excluded from the assessment as it was not considered a differentiating factor between sites. A four-point scale (significant / partial / limited / no) was used to classify the level of contribution that sites make to Green Belt purposes. The assessment of each sites also included a site and landscape appraisal, and an assessment of other considerations. The latter included the potential for	The study assessed two strategic and two small scale sub-areas that had been identified as weakly performing in the SKM Stage 1 Green Belt Review. The Stage 2 also assessed Green Belt sites identified in the Strategic Housing Land Availability Assessment (SHLAA), and the Gypsy and Traveller Land Availability Assessment (GTLAA) call for sites. *As documented in section A2.2.2, the Inspector raised concerns that the assessment did not examine all potential development sites adjacent to urban areas.*

Local Authority	Study (Date, Author)	Summary of Approach	Sub-area Identification
		cumulative impacts, boundary adjustments and identification of cross boundary issues. *As documented in section A2.2.2, at Examination, the Inspector raised a number of concerns including cautioning against integrating landscape character assessment within a Green Belt review. It was reiterated that the focus should be on openness.*	
	Green Belt Study Stage 3 (2019, LUC)	Responding to the Inspector's comments, the study included: - a strategic review of the Green Belt, - a review of washed over villages, - an assessment of land parcels adjacent to inset built-up areas with regards to their contribution to Green Belt purposes as well as potential harm if release / development was undertaken, - an assessment of potential harm to Green Belt purposes from creation of new settlements, and - identification of the land that is most essential in terms of its contribution to Green Belt purposes. The study assessed Green Belt against the NPPF Green Belt purposes 1-5 and a local purpose regarding maintaining the existing settlement pattern. A three-point scale (significant / partial / limited or no) was used to assess classify the level of contribution that parcels make to Green Belt purposes. In the assessment of Green Belt harm, three factors were taken into consideration: - Contribution across the area to the NPPF Green Belt purposes. - Potential implications on the integrity of the wider Green Belt. - Consistency and strength of Green Belt boundaries. Professional judgement was used to consider the weight attached to each contributing factor when assessing overall harm, which was rated using a six-point scale (very high	Assessment parcels were identified next to, or in close proximity to, the inset (including proposed inset) settlements. Land constrained by absolute environmental constraints to development was excluded from assessment, as was immediately adjacent land which was clearly (without the need for detailed assessment) making a strong contribution to Green Belt. The parcel boundaries were defined using natural and man-made features.

Local Authority	Study (Date, Author)	Summary of Approach	Sub-area Identification
		harm, high harm, moderate-high harm, moderate harm, low-moderate harm, low harm).	
Experience Elsewhere			
Aylesbury Vale District Council	Green Belt Assessment Part 2 (2016, AVDC)	The Green Belt Assessment considered areas identified in the Stage 1 assessment as performing weakly against Green Belt purposes; sub areas that have the potential to perform weakly; areas which although are medium or strongly scoring have particular characteristics or synergies with neighbouring weaker general areas; and non-Green Belt areas that could be considered for inclusion in the Green Belt. The approach to the assessment was to: a. assess the suitability of areas for development using the HELAA methodology that was jointly agreed by the Buckinghamshire authorities; b. identify whether the boundaries meet the NPPF requirements; c. determine whether exceptional circumstances justify the release of the land from the Green Belt; d. analyse whether there are reasons for including new land within the Green Belt and; e. assess what the cumulative impacts of the proposed changes to the Green Belt would be.	The Aylesbury Vale Green Belt Assessment Part 2 assessed the 'general areas' and 'sub-parcel areas' that had been identified in Part 1 of the assessment as warranting further consideration for potential removal from the Green Belt, as well as other options the Council were considering for land within the Green Belt. The areas for further consideration included the following: • General Areas, which scored weakly overall against the NPPF purposes • Whole General Areas or clusters of General Areas, which performed medium or strongly scoring against the NPPF purposes but have particular characteristics or synergies with neighbouring weaker General Areas • Medium or strongly scoring General Areas where there is clear scope for sub-division to identify weakly performing 'sub-areas', including the presence of boundary features which have the potential to be permanent and recognisable • Non-Green Belt General Areas, which could be considered for inclusion in the Green Belt.
Chiltern District Council and South Bucks District Council	Green Belt Assessment Part Two Update (2019, CDC and SBDC)	The approach to assessment was to evaluate the sub-areas against the NPPF Green Belt purposes; to identify whether sub-area release from the Green Belt would result in harm to the wider strategic Green Belt and any cumulative impacts; to consider whether potential new Green Belt boundaries would be permanent and defensible in accordance with NPPF requirements. A six-point scale (strong, relatively strong, moderate, relatively weak, weak, none) was applied to the defined purpose assessment criteria. The criteria adopted were the same as those used in the Stage 1 Buckinghamshire Green Belt study, conducted by Arup. Thus, the sub-areas were	The Part 2 assessment considered the areas identified as weakly performing in the Part 1 assessment carried out at a strategic level for all Buckinghamshire authorities.

Local Authority	Study (Date, Author)	Summary of Approach	Sub-area Identification
		assessed against NPPF purposes 1-4; purpose 5 was excluded as all parcels make an equally significant contribution to this purpose.	
Royal Borough of Windsor and Maidenhead	Edge of Settlement: Part 1 Green Belt Purpose Assessment / Part 2 Constraints, Opportunities and Delivery Assessment (2016, RBWM)	This assessment was preceded by a strategic level Green Belt Purpose Analysis (2013) which comprehensively considered all Green Belt designated land within the Royal Borough of Windsor and Maidenhead. Part 1of this Stage 2 assessment sought to assess how individual parcels of land performed against the Green Belt purposes as set out in the NPPF and identify those which are weakly performing. The parcels were assessed against NPPF purposes 1-4; purpose 5 was excluded as all parcels make an equally significant contribution to this purpose. A five point scale was applied to the purpose assessment criteria (none or limited contribution, lower contribution, moderate contribution, strong contribution, very strong contribution). Part 2 of this Stage 2 assessment considered how individual parcels of land perform against a wider range of factors and identified those which were more or less suitable for development. This was based on analysis of constraints that might limit or influence the type, form or capacity of a site; and an assessment of opportunities (beneficial factors) and deliverability considerations.	The Edge of Settlement Analysis: Green Belt Purpose Assessment considered all land on the edge of those settlements which are themselves excluded from the Green Belt. To ensure a comprehensive assessment all areas of land were considered regardless of whether it had been promoted by the landowner as being available for development. Land was excluded if it was subject to major policy constraints. Boundaries for the sub-areas were defined using physical features that were readily recognisable and likely to be permanent.
Runnymede Borough Council	Green Belt Review Part 2 (2017, Arup)	The Runnymede Borough Council Green Belt Review Part 2 assessed areas of Green Belt land identified as weakly performing the Green Belt purposes in the Part 1 review. The overarching approach to the assessment was: Identify sub-areas for assessment in line with boundary features which have the potential to be permanent and readily recognisable. Assess sub-areas against NPPF purposes 1-3. Purpose 4 was excluded as no historic towns were identified in the borough and purpose 5 was excluded as all parcels make an equally significant contribution to this purpose. A six- point scale (strong/ very strong, relatively strong, moderate, relatively	RBC's spatial strategy is that urban and brownfield sites should be prioritised for development. In line with this spatial strategy, Runnymede Borough Council Green Belt Review Part 2 used indicative fixed buffers around each identified settlement, to indicate the likely maximum extent of sustainable development. In determining an appropriate width of buffer, the Council carried out a literature review of broadly comparable studies elsewhere. The findings from the literature review, along with the conclusions of the centre hierarchy paper, and considerations on the size of the Borough and spacing of settlements, led to a range of buffer widths being tested. Overall, it was decided that a 400m buffer would provide a reasonable zone for the town centres and key service centres. The 250m buffer was considered a reasonable buffer for the local service centres and their

Local Authority	Study (Date, Author)	Summary of Approach	Sub-area Identification
		weak, weak / very weak, none) was applied to the defined purpose assessment criteria. Assess sub-area role in the wider, strategic Green Belt	surrounding urban areas. These buffers indicated the likely maximum extent of sustainable development, and vary according to the position of the settlement in the centre hierarchy. It was considered that assessing wider buffers would to some extent cause duplication with previous work undertaken, and might encourage unsustainable forms of development away from settlements. The assessment covered the full extent of the buffer, to ensure that sub-areas that were not directly adjacent to the settlement, but still functionally related, were still considered as part of the assessment. Promoted sites located outside of the buffers were excluded from the assessment. The buffers helped to identify 'in-between' sites that would logically form sub-areas for assessment.
Spelthorne Borough Council	Green Belt Review Part 2 (Arup)	Sub-areas were assessed against the purposes of the NPPF, the role they play in relation to the wider strategic Green Belt and the strength and regularity of proposed boundary features. The assessment criteria were broadly the same as those used for the Stage 1 GBR. Sub-areas were assessed against purposes 1-4, purpose 5 was excluded as all parcels make an equally significant contribution to this purpose. A six- point scale (strong/ very strong, relatively strong, moderate, relatively weak, weak / very weak, none) was applied to the defined purpose assessment criteria. An overarching recommendation was drawn based on overall NPPF purpose performance and the sub-area's contribution to the wider Green Belt.	The study assessed Local Area for Potential Sub-Division, identified in the Stage 1 GBR and identified additional sub-areas using defensible boundary features, on the basis of flexible buffers around settlements, with additional filters applied relating to major buffer features, emerging promoted sites and to remove whole areas subject to major policy constraints. The buffer (250m) was defined taking into account local circumstances, such as settlement patterns and gaps, topography and extent of Green Belt. As a relatively small densely developed borough with relatively small gaps between built-up areas and relatively modest extent of Green Belt, a narrow buffer was considered appropriate. The buffer was refined inwards where major visual / physical features were present (i.e. topographic features, significant waterbodies and major roads).
Wycombe District Council	Green Belt Part Two Assessment (2017, WDC)	The Wycombe Green Belt Part Two Assessment considered the value and role of sub-areas in relation to the NPPF Green Belt purposes; how the sub-areas contributed to the wider strategic Green Belt; whether potential new Green Belt boundaries would be robust and defensible; and whether exceptional circumstances exist to justify amendments to the Green Belt. In addition, the assessment determined whether sub-areas were developable with reference to the Housing and Economic Land Availability Assessment (HELAA).	The study reviewed the weakly performing sub-areas identified in the Part 1 review. In addition to this, other sub-areas were defined by considering Green Belt sites actively promoted by a landowner / developer and sites identified by Council Officers as capable of contributing to sustainable development.

A.3.3 Washed Over Village Assessment Methodology

Table A.3 provides a high-level of summary of approaches used elsewhere for a selection of authorities. All of the studies included a staged approach consisting of some or all of these stages:

- Identify villages to be assessed,
- Identify development limits of village,
- Assessment of open character,
- Assessment of openness,
- Decision on insetting or washing over of village, and
- Review development limits/boundaries where village is to be inset.

Key points to note:

- Accordance with settlement hierarchy, where one exists.
- Where a settlement hierarchy does not exist, consideration of service provision, public transport availability, population and coherence of settlement.
- Variety of approaches for assessing openness including consideration of patterns of development, topography, density and relationship to the surrounding landscape
- Consideration of NPPF requirements on Green Belt boundaries in decisions on insetting a village.

Table A.3 Washed Over Village Assessment Experience Elsewhere

Local Authority	Study	Summary of Approach
Central Bedfordshire Council and Luton Borough Council	Central Bedfordshire and Luton Green Belt Study (2016, LUC)	**Purpose**: Review main settlements within the Green Belt and make recommendations on which settlements should be inset and which settlements should be washed over. **Villages**: All major and minor service centres, large and small villages listed in Central Bedfordshire's settlement hierarchy were assessed, where both inset and washed over. **Approach**: Settlements that contained strong characteristics that contradiction their status as either inset or washed over settlement were first highlighted in a Stage-1 desk-based assessment. This included an assessment to whether their urbanising features compromise the openness of these washed over settlements. The identified settlements were then visited at Stage 2 to verify the judgements. These verified judgements were used to inform the recommendations of whether they should remain washed over or become inset from the Green Belt.
Cheshire East Council	Green Belt Villages Study (2017, Arup)	**Purpose**: The study reviewed the status of washed over villages within / inset in the Green Belt across the district. **Village**: In the absence of a settlement hierarchy, the following factors were used to determine whether the settlement constitutes a village: (a) level of service/facility provisions; (b) availability of public transport; (c) presence of a coherent settlement; (d) population. **Approach**: There were four strands to the methodology: (a) assessing whether a settlement can be identified as a village; (b) identify washed over village boundaries/ review inset village boundaries;(c) assess openness of villages; (d) if a village was recommended for insetting, consider new inset boundaries. Stage A: Assessing how many of the factors (service/facility provision, public transport, and settlement coherence) does the settlement meet. Where it meets all factors, it constitutes a village. Stage B: Identify a boundary around the village for the purposes of the assessment. Existing boundaries will be reviewed and for those settlements which do not have a working boundary, the limits of the built curtilage was used. Stage C: Assessment of open character focussing on the; density, scale and form, type of dwelling, plot size, building heights, the enclosures or barriers, the extent of open space or gaps in frontages and the topography. Assessed as high, medium or low. Secondary assessment to asses whether the open character makes an important contribution to the openness of the Green Belt. The relationship the village has with the openness of the surrounding Green Belt is based on: the views into and out of the village along its periphery and whether views in/out are restricted and/or obscured and if so, whether by natural, man-made or topographical features. Secondly, by the relationship between open or private amenity areas on the periphery of the village and the surrounding Green Belt and how these interact with any gap to an adjacent settlement or development. Conclusions of assessment and recommendations Stage D: New inset boundaries were defined in relation to the NPPF policy on Green Belt boundaries with particular reference to including land that does not need to be necessarily kept permanently open within the inset villages and permanent readily recognisable boundaries. Criteria relating to these policy requirements were used to identify boundaries.

Local Authority	Study	Summary of Approach
Chiltern District Council and South Bucks District Council	Review of Settlements within the Green Belt, (2019, CDC and SBDC)	**Purpose**: Review the status of the villages within the Green Belt. Assessed the openness of villages and where it should be retained or removed from the Green Belt. **Village**: A settlement of sufficient size and cohesion to be regarded as a place in its own right and which has a form which permits infilling. **Approach**: There were three strands to the methodology: (a) assessing whether a settlement can be identified as a village; (b) an assessment of openness for those settlements identified as villages; (c) defining defensible boundaries Stage A: Review whether a settlement area can be identified as a Village It the settlement can be identified as a village, it moved onto the next stage of assessment. Stage B: Assessment of the openness in terms of the character of the village and its contribution to the openness of the Green Belt. If a village is regarded as being open in character and the village is regarded as contributing to the openness of the Green Belt the assessment would conclude that the village should remain in the Green Belt and be covered by a limited infilling policy. If the village is regarded as not being open and that it makes no contribution to the openness of the Green Belt then the village would pass onto the next stage. Stage C: Defining a defensible boundary where a village is considered for removal from the Green Belt. The new Green Belt boundaries were identified using the same definition of defensible boundary features as deployed in the Stage 1 and 2 Green Belt Assessments. New boundaries had to be clearly related to the existing built form. If a permanent defensible boundary could not be drawn around the village, it was not considered suitable for removal from the Green Belt.
Christchurch and East Dorset Council	Green Belt Assessment, (2017, LUC)	**Purpose**: Considered whether there is justification for any 'washed over' villages within the Green Belt to be identified as distinct parcels for assessment at Stage 2. Assessed whether washed over villages were sufficiently lacking in openness to warrant more detailed assessment in smaller parcels at Stage 2, with the view of potentially insetting them into the Green Belt. **Villages**: Used settlement hierarchy to define villages. **Approach**: Villages assessed for their contribution to safeguarding the countryside from encroachment (GB purpose 3) and contribution to preventing the merger of neighbouring towns (GB purpose 2). The settlement was then considered as an inset settlement area. Assessment to determine if village is sufficiently open to justify washed over status. Considered settlement size, density, form, the extent of urbanising characteristics (such as pavements and street lighting) and overall sense of openness.
Guildford Borough Council	Guildford Borough Green Belt and Countryside Study: Vol IV – Insetting of Villages and Defining New Green Belt boundaries within Guildford Borough in accordance with	**Purpose**: To determine the potential suitability or appropriateness of each village for insetting within the Green Belt, **Approach**: Used a three-stage assessment to test the primary considerations of openness and permanence. **Villages**: Used the settlement hierarchy to define villages. Stage 1: Assessed degree of openness within each village through analysis of urban form, density and the extent of developed land. This included mapping the detailed locations of developed and open areas to determine how this relates to openness of the wider Green Belt. Openness was assessed literally and perceptually. Stage 2: Assessed the surroundings area and potential new Green Belt boundaries at each village; and identifies defensible boundaries.

Local Authority	Study	Summary of Approach
	the NPPF, (2014, Pegasus)	Stage 3: Assessed the suitability of each village for insetting with the Green Belt and defining potential Green Belt boundaries. Used professional judgement – supported by the objective assessment within stage 1 and 2. Areas for consideration were as follows: • Does the majority of the village exhibit open character? • Do open areas within the village generally appear continuous with surrounding open land beyond the village – from within/ or outside the village? • Do the majority of the village edges exhibit incomplete, indistinguishable boundaries that would not permit the provision of new Green Belt boundaries in accordance with the requirements of NPPF para 85?
Hertsmere Borough Council	Green Belt Review Stage 3 (2020, Arup)	**Purpose**: To inform the spatial strategy for Hertsmere Borough Local Plan by looking at whether it is necessary to restrict development in a washed over village because of its contribution to openness of the Green Belt, or conversely whether the village's inclusion in the Green Belt should be reconsidered due to the limited contribution which the open character of the village makes. **Villages**: National policy, case law, settlement hierarchy, conservation areas and local context were all factors in defining the study areas. **Approach**: The assessment set out criteria, all of which relate to the village's contribution to the openness of the Green Belt. The criteria are: • Landmarks and prominent skyline/orientation features • Gateways and settlement arrival/countryside and settlement 'interface' points • Nodes, key open spaces • Key views to/from settlement • Settlement form and scale • Settlement edge characteristics and setting Each village for assessment was scored as performing either low, moderate or high against each of the above criteria.
North Hertfordshire District Council	Green Belt Review (2016, NHDC)	**Purpose:** The study included an assessment of the settlements set within the Green Belt and whether the designation should be removed, or the village boundary amended. Three possible outcomes were identified: (a) an inset village where Green Belt policy does not apply; (b) a washed over settlement, where Green Belt policies apply; and (c) a washed-over settlement with an infill boundary, within which limited development would be allowed as long as it did not affect Green Belt openness or the ability of the village to meet Green Belt purposes. **Approach**: Each settlement was assessed in terms of its openness (character and relationship with the Green Belt), the contribution it made to Green belt purposes and the potential for insetting. For those villages proposed for insetting, new Green Belt boundaries were identified; however, it is not clear from the report, how these new boundaries were identified.

Local Authority	Study	Summary of Approach
Reigate & Banstead Borough Council	Development Management Plan (Regulation 19) Green Belt Review	**Purpose**: The primary purpose of Part 3 of the study is to review villages, settlements and large developments to establish whether the current approach to insetting these within the Green Belt, or washing these over with Green Belt designation, remains appropriate (Policy CS3 4c). **Village**: A number of functional and physical characteristics were used to determine whether the areas identified could be classified as a "village" or independent settlement area in their own right and therefore whether they should be assessed for potential removal from/insetting within the Green Belt. **Approach**: The areas identified were then categorised according to the extent to which they met the characteristics. This was combined into an overall conclusion as to whether the area constituted a village/independent settlement area or not. The NPPF sets out the basic principle which should be applied in determining whether areas should be washed over by, or inset within the Green Belt. In simple terms, this entails an assessment of the character and openness of the area and the extent to which it relates to the wider Green Belt. A series of key factors and decision-aiding criteria were developed in order to assess how the settlements aligned with the NPPF principles: density, compactness, building scale/massing and boundaries and visual permeability. Those which were deemed to make only a poor contribution to green belt openness were recommended to be inset.
Runnymede Borough Council	Runnymede 2030 Green Belt Village Review: Stage 1 Update, (2018, RBC)	**Purpose** This study complemented the Stage 1 Green Belt Study. It looked to determine whether any built development that lies outside of designated settlements in Runnymede should be considered a village and whether they should remain washed over or excluded from the Green Belt. **Village** identification Definition in terms of form, population and service provision drawing on: Oxford English Dictionary definition, Office of National Statistics Rural-Urban classification guidance, and the South East Plan guidance on defining types of settlement / service centres. **Approach**: Assessed the open character of a village and the contribution it makes to the openness of the Green Belt. In line with PAS guidance, it focused on assessing openness and not landscape quality. Stage 1: Identified villages using the NPPF definition. Stage 2: Identified boundary around villages for assessment. Stage 3: Considered whether the village has an open character. Assessment based on density (built development as a whole and how this differs across the village area), scale and form, type of dwelling, plot size, building heights, enclosures or barriers, extent of open space or gaps in frontages (views or obscured) and topography. Stage 4: Considered the relationship that the village has with the openness of the surrounding Green Belt, based on views into and out of the village; relationship between open or private amenity areas on periphery of the village and surrounding Green Belt and how these interact with any gap to an adjacent settlement or development.

Local Authority	Study	Summary of Approach
		Stage 5: Results from Stages 3 and 4 were taken together to assess whether an area had an overall degree of open character of openness (or not). This formed the basis as to whether a village should be 'washed over' by the Green Belt or excluded. Stage 6: If a conclusion was reached to exclude a village from the Green Belt, then a more in-depth and finer grain consideration of village boundary was undertaken.
Tandridge District Council	Green Belt Assessment (Part 3): Exceptional Circumstances and Insetting, (2018, TDC)	**Purpose**: Makes recommendations as to which settlements should be 'inset' from the Green Belt in accordance with Paragraph 86 of the National Planning Policy Framework. **Villages**: Used the settlement hierarchy to define villages. **Approach**: Openness assessment comprising three stages. Where it has been concluded that the village does have an open character, the second step is to assess whether that open character makes an important contribution to the openness of the Green Belt. The third step, if it is concluded that its open character makes an important contribution, is to assess whether it is necessary to prevent development in the settlement for the reason of contribution to openness. Where a settlement has passed each step of the assessment, the settlement should remain washed over by the Green Belt.
Three Rivers District Council and Watford Borough Council	Green Belt Stage 1 Assessment (2017, Amec Foster Wheeler)	**Purpose**: This assessment forms part of the Stage 1 Green Belt assessment and sets out recommendations on whether existing settlements within the Green Belt should be 'inset' in accordance with Paragraph 86 of the NPPF. **Villages**: Used the settlement hierarchy to define villages. **Approach**: A character assessment was undertaken for each of the villages identified, this involved a review of the villages against the following considerations: location, setting, topography, settlement form, building types, focal points, Conservation Areas, density, buildings layout, presence / character of open space, interface with surrounding landscape.

Appendix B

Duty to Cooperate Consultation

B.1.1 Duty to Cooperate Consultation

SACDC sought feedback on the methodology from adjoining Local Authorities to ensure consensus on the approach. The following authorities were consulted:

- Central Bedfordshire Council
- Dacorum Borough Council
- Hertfordshire County Council
- Hertsmere Borough Council
- Luton Borough Council
- North Hertfordshire District Council
- Three Rivers District Council
- Watford Borough Council
- Welwyn Hatfield Borough Council

Stakeholders were able to provide written comments on the draft Methodology. Table B.1 presents the consultee responses and details Arup's response and where appropriate, the change made.

Table B.1 Duty to Cooperate Comments and Responses

Consultee	Consultee Response	Response
Central Bedfordshire Council	Thank you for consulting Central Bedfordshire Council (CBC) on St Albans City and District Council (SACDC) Green Belt Review Methodology. Please accept this letter as our formal response. We would like to thank you for the opportunity to comment on the outline methodology. We note that you are at a relatively early stage in this process and at this stage we do not have any comments to make on the proposed methodology. We would however like to request that we are kept informed throughout the process and we will be interested to review any findings once available.	Noted – no change.
Dacorum Borough Council	We welcome the recognition in the study of the existing Stage 2 work undertaken by Arup for Dacorum. In the absence of an extension to time, we would request if Arup or St. Albans could quickly highlight (by return of email) where the proposed methodology deviates substantially with the work done for Dacorum, if applicable.	No change – except where identified. The methodology proposed has been designed to align with other Green Belt studies that Arup has carried out in the immediate area, albeit to reflect the particular circumstances within St Albans district itself and more recent experience / lessons learnt from a review of Independent Examinations. Within these parameters, particular reference was given to aligning the methodology to the approach taken in Dacorum given the shared Stage 1 Green Belt study. • Definition of sub-areas: Broadly similar approach taken to identify sub-areas. Drawing on the recommendations from the Stage 1 SKM study and also considering parcels immediately adjacent to inset settlements. Note that land subject to major policy constraints has been removed from further consideration at this stage, which aligns with recent Inspector's comments. In Dacorum this sift took place after the Purpose assessment. However, this is judged to have no net difference in terms of overall recommendations. • Scoring: Same approach adopted using a 1-5 scale with no weighting or aggregation of scores. • Purpose 1 assessment: Criteria aligned. Change: minor revision to wording of criteria scores to ensure greater alignment. • Purpose 2 assessment: Criteria and scoring aligned. • Purpose 3 assessment: Criteria aligned. Minor differences in % built form assumed for scoring – however, note it is aligned with those used for Hertsmere Stage 2 GBA. Differences are not considered significant. • Purpose 4 assessment: This purpose was not deemed relevant as part of the Dacorum study. Note the approach is broadly aligned with that

Consultee	Consultee Response	Response
		used for Hertsmere Stage 2 GBA albeit reflecting the broader definition of historic places adopted in the Stage 1 SKM study. • Landscape sensitivity appraisal: The Dacorum study included an additional stage assessing landscape sensitivity. As shown by the review of experience elsewhere, this type of analysis is often conducted as a separate study rather than combined with Green Belt assessment. It does not form part of this study. • Contribution to wider Green Belt: Approach broadly aligned. • Boundary assessment: Approach broadly aligned.
	On the assessment of washed over villages, please note a degree of caution on this. Examples seen in some other Local Plan examinations on insetting one or more villages (admittedly under the older NPPF) does create more issues than it solves. It is important that the Council is clear on whether 'exceptional circumstances' exist to justify insetting an entire village. This is a process that needs to be considered separately to Green Belt changes for the purposes of allocating.	Noted – no change. The preparation of the exceptional circumstances lies outside of this study.
	One example of this noted was the proposed inset of Farmoor village just west of Oxford City (Vale of White Horse District). If you are aware of any successful examples in recent years I'd like to know, otherwise I'd question the need to do this in the absence of an 'exceptional circumstances' case.	Noted – no change. Runnymede Borough Council successfully proposed insetting Thorpe Village. The proposal was found sound by the Inspector and included within the adopted Local Plan.
	On a review of town/village boundaries, again Arup will be aware of Dacorum's views on this where it relates to land not promoted for development. A suggested approach to this is for Arup to make recommendations, however the Council should review these separately against whether the 'exceptional circumstances' exist to make such changes.	Noted – no change. All recommendations resulting from the assessment will be presented to the Council for further consideration as part of the development of the spatial strategy. It will be for the council to weigh the balance between the different evidence base studies and ultimately propose any changes. Equally, it will fall to the Council to prepare the exceptional circumstances case to justify any release based on the unique local circumstances, which will need to be related to the overall spatial vision and objectives for the place.
Hertsmere Borough Council	Thank you for consulting us and as you have commissioned Arup, who obviously carried out our Green Belt assessment too, the methodology aligns with our own.	Noted – no change. The methodology has been designed to align with other Green Belt studies that Arup has carried out in the immediate area, albeit reflecting the particular circumstances within St Albans district itself and more recent experience / lessons learnt from a review of Independent Examinations.

Consultee	Consultee Response	Response
	We would ask that the Bowmans Cross site is acknowledged as it falls within one of the original sub areas assessed in your stage 1 and is located close to London Conley (albeit separated by the M25 and bell roundabout) It may be sufficient to just paraphrase the key finding of the Arup report for Hertsmere in terms of the impact on London Conley and Colney Heath from Bowmans Cross but it's important for Arup to take a boundary-off approach Similarly, it might be helpful for Arup to plot any other sites within or on the edge of any buffers around other nearby settlements in adjoining districts and cross reference their findings elsewhere (or if carried out by other consultants, by those consultants' findings). In our case, that would mean a limited number of sites around the edge of Shenley and Radlett	Noted – no change. As part of the wider assessment, the cumulative loss of adjacent sub-areas is considered. For sub-areas located on or over the borough boundaries, consideration is given to proposed changes in neighbouring authority Green Belt assessments. This includes proposals such as Bowmans Cross and sites around Shenley and Radlett.
Welwyn Hatfield Borough Council	St Albans Green Belt Review Methodology Paper Thank you for informing us of your Council's appointment of Arup to carry out a new Stage 2 Green Belt Review and inviting our views on the proposed Green Belt Review Stage 2 Methodology. It is recognised that there is no agreed methodology for carrying out a Green Belt review, but PAS provide guidance in "Planning on the Doorstep: The Big Issues" (2015) and best practice is established through the Local Plan process, where they have been through the Examination process and been found sound. We note the proposed methodology as set out in the Methodology Paper (May 2021) and make the following observations.	Noted – no change. The methodology has been developed to reflect the PAS guidance and experience elsewhere, including through Examination processes.
	Cross boundary parcels assessment Although it is not the purpose of the Paper to provide an assessment of any parcels at this stage; we note no mention is made of how parcels that cross administrative boundaries will be assessed, in terms of taking a consistent approach in relation to the assessment methodology used in other Local Authority's own green belt assessments. The methodology does refer to the Inspector's findings at the Stage 5 hearings of the Welwyn Hatfield Local Plan examination, quoting that the Inspector noted that there should be an agreed approach to the shared Green Belt between Hatfield and St Albans.	No change – except where identified. The methodology has been designed to align with other Green Belt studies that Arup has carried out for Hertsmere and Dacorum, albeit reflecting the particular circumstances within St Albans district itself and more recent experience / lessons learnt from a review of Independent Examinations. As part of the review of experience elsewhere, approaches taken into other neighbouring authorities were also examined including at Welwyn Hatfield (as noted in sections A2 and A3). Change: Welwyn Hatfield Stage 3 Study and further detail added to summary table A3.1. Plus, an additional comparative table added in section B1.2. Figure 4.6 shows the sub-areas for assessment and it can be noted that the following parcels cross boundaries: • Central Bedfordshire: SA-20 • Dacorum: SA-168

Consultee	Consultee Response	Response
		• Three Rivers: SA-159 • Hertsmere: SA-152, SA-157, SA-149, SA-150, SA-151, SA-143 and SA-142 • Welwyn Hatfield: SA-76 The majority of the cross-boundary parcels fall within Hertsmere. As set out in this table, Hertsmere Borough Council have confirmed that they are happy that two methodologies are aligned. Only very small slithers of the sub-areas that lie across the St Albans boundary fall within Dacorum, Three Rivers and Welwyn Hatfield. While around half of a sub-area straddles the Central Bedfordshire boundary. A summary table of the methodologies employed these authorities is presented in section B1.2. It is judged that they broadly share the same approach to assessing Green Belt. As part of the assessment of wider impacts, the cumulative impacts of proposed changes will be considered, this will include assessment of impact on neighbouring authorities Green Belt. For those parcels to the east of St Albans, this will consider the approach / changes to the shared Green Belt between Hatfield and St Albans. In determining the assessment, the assessments / conclusions in the neighbouring Green Belt studies will be reviewed.
	We note the proposed methodology is to use a numerical points-based scoring system (section 4.5.1, Table 4.3) in assessing the performance of the parcels against the purposes of the green belt set out in the NPPF, this is in contrast with the approach in Welwyn Hatfield which is based on a rating system assessing how the parcel contributes to the purposes of the Green Belt.	Noted – no change. Although presentationally different, the two approaches are broadly aligned and both assess how the parcel contributes to the purposes of the Green Belt. Note that although the Arup method allocates numbers for each criterion, these are intended to indicate the degree of contribution that a sub-area makes to a purpose. These scores are not added up to give a total point score per sub area. Reading across the two studies, the scale of '0-5 in this study' is broadly equivalent to the 'limited or no contribution' – 'significant contribution' scale used in the Welwyn Hatfield Stage 3 study.
	Following on from the assessment of contribution of Green Belt land to the Green Belt purposes, the Welwyn Hatfield Stage 3 Green Belt Study undertook an assessment of the potential harm of release/development. This was a requirement from the Inspector following the examination of the first two Green Belt studies. A 6-point scale from Low Harm to Very High Harm was used taking into account the contribution to the purposes as well as the impact on the boundaries of the Green Belt and whether or not the remaining Green Belt would be weakened as a	Noted – no change. Although the two methodologies vary in the way that the assessment is presented, the overall approach is considered to be consistent. As part of Step 4a, the sub-area assessments will consider the impact on the wider Green Belt and boundary considerations (see sections 4.52 and 4.5.3).

Consultee	Consultee Response	Response
	consequence of a parcel or sub-parcel. It appears such a 'harm assessment' is not proposed and would be a further difference between our respective approaches. It should be noted that the stage 3 study also identified those parts of the Green Belt it is essential to retain and that the gap between St Albans and Hatfield in part of P46 and most of P48 falls into this category.	The questions addressed are broadly aligned with the assessment of harm in the Welwyn Hatfield assessment (paragraph 7.2). As set out above, as part of the assessment on the Wider Green Belt impact, neighbouring Green Belt assessments will be considered including noting where these assessments identify Green Belt that is considered important to retain.
	These differences in approach could make comparison of the parcels' importance as Green Belt difficult. As referred to above, the Welwyn Hatfield Local Plan Inspector has noted there should be an agreed approach to the shared Green Belt between Hatfield and St Albans. While our preference would be for the same methodology, if there are to be differing rating criteria, we ask that the approach cross boundary parcel assessment be set out and officers be consulted when the assessment of these parcels are carried out.	Noted – no change. There is only one cross-boundary parcel between St Albans and Welwyn Hatfield. Only a very small slither of the sub-area lies within Welwyn Hatfield. A summary table of the methodologies employed in authorities with a cross-boundary sub-areas is presented in section B1.2. It is judged that they broadly share the same approach to assessing Green Belt. As set out above, the assessment of wider impacts will consider the outcomes of the Welwyn Hatfield Green Belt assessment and therefore no issues relating to any minor methodological differences should result.
	Settlement Buffers (section 4.2.1) The methodology uses two buffers using scales to reflect the variations in the settlement hierarchy and states that this is to ensure that any future development would remain proportionate to the size of the existing built-up area. Buffers were also applied to the immediately adjacent settlements in neighbouring authorities, including WHBC, where the buffer would lead to some partial interception with the SACDC green belt. "…the character of the urban settlements and the approach for a finer grain assessment leant itself to a 400m buffer for the main settlements while a 250m buffer was considered reasonable buffer for lower order settlements (Table 4.1, Figure 4.2). These buffers indicate the likely maximum extent of sustainable development and vary accordingly to the position of the built-up area in the settlement hierarchy." Clarification is sought on the adoption of the use of buffers. We would be grateful for further details on the justification for why the two distances of 400m and 250m are the maximum extent of sustainable development. We assume the sustainability will depend on the provision of facilities and accessibility, together with other factors, although broadly represented by the settlement hierarchy, some smaller settlements may still be relatively sustainable locations for development.	Noted – no change. As set out in Table A3.1, a review of experience elsewhere reveals that other authorities have adopted a buffer approach, or equivalent, to narrow the focus of Stage 2 Green Belt assessments primarily to sub-areas immediately adjacent to existing settlements. This approach has been tested at examination, (for example Runnymede) and found to be sound. The choice of buffer sizes is based on the likely maximum extent of sustainable development and varies according to the position of the settlement in the settlement hierarchies. It was considered that assessing wider buffers would to some extent cause duplication with previous work undertaken in stage 1 Green Belt assessment and might encourage unsustainable forms of development away from settlements. The buffers were applied to all inset settlements. The smaller settlements within St Albans are all washed over and are subject to separate consideration as part of the washed over village assessment.

Consultee	Consultee Response	Response
	The document also states that the buffers are also to be used to ensure that future development is proportionate to the size of the existing settlement, we are unsure how this relates to the assessment of the parcels in relation to the green belt purposes.	
	Table 4.1 Settlement Buffers identifies Hatfield as having a 250m buffer while Figure 4.2 shows a 400m buffer. It would appear the error is with Table 4.1 rather than the Map.	Change. Table amended to correct Hatfield's buffer as 400m.
Watford Borough Council	Thank you for the opportunity to review your Green Belt Review Methodology. We have no substantial comments on the Methodology, except to say that with the commitments to align ourselves via the Joint Strategic Plan (mentioned in A1.2) it is important that the methodology used is close or even identical to those used by your SW Herts neighbours. That will be especially helpful for the JSP as it eventually gets going. I note that in regard to settlement buffers they have looked at Dacorum and Hertsmere.	Change: Further detail added to summary table A3.1. Plus, an additional comparative table added in section B1.2. The methodology has been designed to align with the Green Belt studies that Arup has carried out for Hertsmere and Dacorum, albeit reflecting the particular circumstances within St Albans district itself and more recent experience / lessons learnt from a review of Independent Examinations. As part of the review of experience elsewhere, approaches taken into other neighbouring authorities were also examined including the two other strategic partners, Watford and Three Rivers (as noted in section A3). A summary table of the methodologies employed by the SW Herts authorities is presented in section B1.2. It has been judged that they broadly share the same approach to assessing Green Belt.
	Zone 27 between Watford and Bricket Wood has been noted. Table 4.1 states that no buffer applies to Watford but then there is a 400m buffer off the SADC Garston area boundary. It would be good if the approach to buffers and the assessment are clarified in this area.	No change. Table 4.1 states that a 400m buffer was applied to Watford. This buffer was applied to the whole of Watford urban built form, including the Garston Area, as Watford was considered a higher order settlement. Table 4.1 states that the 250m does not apply in Watford borough as there were no lower order settlements identified in the immediate vicinity of the St Albans district boundary.
	Does the approach to assessment reflect the approach taken by earlier stage 2 GB assessments carried out by HBC, WBC for consistency? Will a comparison/review of this be set out in the methodology as part of the background section if not already done so?	Change: further detail added to summary table A3.1. Plus, an additional comparative table added in section B1.2. The methodology has been designed to align with the Green Belt studies that Arup has carried out for Hertsmere and Dacorum, albeit reflecting the particular circumstances within St Albans district itself and more recent experience / lessons learnt from a review of Independent Examinations.

Consultee	Consultee Response	Response
		As part of developing the methodology, we reviewed experience in all of St Albans neighbouring authorities. Lessons learnt have been reflected in the development of the methodology. An additional table presenting a high-level comparison of approaches by SW Herts strategic partners has been added in section B1.2.
	I do not think this work could have any significant issues with Watford, as our connecting boundary is very small, even though on Page 18 they discuss the possible merger of St Albans with Watford. However the role of the Abbey Line could lead to some interesting debates about the role of the Green Belt versus supporting sustainable transport. That is outside the scope of the Arup work however.	Noted, no change. Outside of the scope of works.

B.1.2 Methodological Comparison

Table B.2 provides a high-level summary (drawing on section A3.3) of the broad approach taken to the Green Belt reviews for St Albans' South West Hertfordshire strategic partners, as well as for all authorities where cross-boundary sub-areas have been identified for assessment in this study. This summary identifies a broad commonality in approach, with the majority of authorities:

- Assessing both Stage 1 weakly performing areas as well as land surrounding inset urban areas.
- Filtering out land subject to environmental constraints.
- Assessing land against NPPF purposes, with clear reasons specified for the exclusion of individual purposes.
- Undertaking an assessment of wider Green Belt impacts and boundary strength.

Table B.2 Comparison of Methodological Approach for Neighbouring Authorities and St Albans with Cross-boundary Sub-areas and / or South West Herts Strategic Partners

Authority	Geographical Scope			Environmental Constraints			Purpose Assessment						Wider Impact Assessment	Boundary Assessment	Cross-boundary Sub-Area	SWH Strategic Partner
	Whole Green Belt	Stage 1 Weakly performing areas	Land surrounding inset urban areas	Land filtered prior to purpose assessment	Land filtered post purpose assessment	Presence noted but land not filtered	NPPF Purpose 1	NPPF Purpose 2	NPPF Purpose 3	NPPF Purpose 4	NPPF Purpose 5	Local Purpose				
Central Bedfordshire		✓				✓	✓	✓	✓	✓				✓	○	
Dacorum		✓	✓		✓		✓	✓	✓					✓	○	○
Hertsmere		✓	✓	✓			✓	✓	✓	✓			✓	✓	○	○
North Hertfordshire	✓		✓				✓	✓	✓	✓				✓		
St Albans		✓	✓	✓			✓	✓	✓	✓			✓	✓		○
Three Rivers			✓	✓			✓	✓	✓				✓	✓	○	○
Watford			✓	✓			✓	✓	✓				✓	✓		○
Welwyn Hatfield		✓	✓	✓			✓	✓	✓	✓	✓	✓	✓	✓	○	

Appendix C

Potential Compensatory Improvement Evidence Base

C.1 Potential Compensatory Improvement Evidence Base

Table C.1 Evidence base for potential compensatory improvements

Theme	Existing Evidence	Summary
Access – to public rights of way, open space, allotments etc	Environmental Capacity of St Albans City and District: Defining a Sustainable Level of Development (2012)	To better understand the role and importance of undeveloped land in the district, and carrying capacity of the non-urban areas and ecological footprint and services of the District.
	Green Infrastructure Plan (March 2011)	Audit of existing green infrastructure assets and assessment of the ability of green infrastructure to provide multiple environmental, social and economic functions. Identified opportunities for enhancement and creation of green infrastructure, and potential projects.
	Public Realm Delivery Strategy (2011)	Proposal aimed at creating streets and spaces to create a better public realm.
	Local Plan Technical Report Green Spaces (2016); Green Space Strategy 2011	Describes and analyses green space provision in St Albans, such as parks, gardens, play area and allotments.
	Green Space Strategy (2011)	Assessment of green space and quality in the District
	Rights of Way Improvement Plan 2011	Context for future management of and investment in the rights of way network
	St Albans City and District Cycling Strategy 2007	Plan for increasing the use of bicycles in the District
	St Albans City and District Walking Strategy 2009	Plan for increasing the levels of walking in the District
Sport and Recreation	Playing Pitch Strategy (2019)	Sets out playing pitches required to support housing growth.
	Sport and Recreation Facilities Strategy (2005)	Analyses the current level of sport and recreational provision and identified strategic options for enhancing provision.
	Forest Plan Review (2001)	Blueprint to the creation of Watling Chase Community Forest, concept for the major new community forest.
Biodiversity, wildlife and corridors	Biodiversity action plan Connectivity data Hertfordshire Biodiversity Action Plan	Analysis and evaluation of the nature conservation resource resulting in detailed proposals for action.
	Habitat Regulations Assessment (2008)	Assessment of the likely effects that may compromise conservation objectives.

Theme	Existing Evidence	Summary
Landscape and visual amenity	South West Hertfordshire Strategic Flood Risk Assessment (2018)	Considers the detailed nature of the flood characteristics within a Flood Zone and assessment of other sources of flooding.
	Dacorum Borough Council, St Albans City and District Council, Three Rivers District Council, Watford Borough Council, Welwyn Hatfield Borough Council Water Cycle Study (2010)	Information on water resources, supply and sewerage, wastewater treatment, flood risk, water quality and wider water environment.
	Hertfordshire Landscape Character Area Statements – St Albans District (2005)	Landscape character assessment and evaluation to enable a definitive classification of all landscape types and boundaries.
Energy and climate change	Hertfordshire Renewable and Low Carbon Energy Study (2010)	Existing and potential energy resources and feasibility for on-site and decentralised energy sources.
	St Albans Energy Opportunities (2010)	Map of opportunities for energy options in St Albans
	Sustainability and Climate Crisis Strategy (2020)	Plan of action to tackle emissions by 2030.

Appendix D

Glossary

D.1 Glossary of Terms and Acronyms

Table D.1 Glossary of Terms and Acronyms

Term	Definition
Countryside	Open land with an absence of built development and characterised by rural land uses including agriculture and forestry.
Duty to Cooperate	A legislative requirement in the Localism Act 2011 which places a duty on Local Planning Authorities and County Councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
Enclosed	Almost entirely contained or surrounded by built development.
Encroachment	A gradual advancement of urbanising influences through physical development or land use change.
Essential Gap	A gap between settlements where development would significantly reduce the perceived or actual distance between them.
GIS	Geographic Information System
GBR	Green Belt Review
Independent Examination	The process by which a planning inspector may publicly examine a Development Plan Document (DPD) or a Statement of Community Involvement (SCI), in respect, before issuing a binding report. The findings set out in the report of binding upon the local authority that produced the DPD or SCI.
Irregular	In relation to the assessment against purpose 1, 'irregular' boundaries are those comprising ill-defined or softer edges to large built-up areas. (All other text to be deleted).
Large Built-Up Area	Areas defined to correspond to the major settlements identified in the respective St Albans and neighbouring local authorities that border the district and used in the NPPF purpose 1 assessment.
Largely Rural Character	Land with a general absence of built development, largely characterised by rural land uses and landscapes but with some dispersed development and man-made structures
Less Essential Gap	A gap between settlements where development is likely to be possible without any risk of coalescence between them.
LNR	Local Nature Reserve
Neighbouring Town	Refers to settlements within St Albans and in neighbouring authorities immediately adjacent to the district's Green Belt, for the assessment against NPPF purpose 2.
NNR	National Nature Reserve (NNR)
NPPF	National Planning Policy Framework
Open Land	Open land refers to land that is lacking in built development.
Openness	Openness refers to the extent to which Green Belt land could be considered open from an absence of built development.
OS	Ordnance Survey
PAS	Planning Advisory Service
PDL	Previously Developed Land
PRoW	Public Right of Way
PPG	Planning Practice Guidance
RAMSAR	Ramsar are wetland on international importance that have been designated under the criteria of the Ramsar Convention on Wetlands.

Term	Definition
Regular	In relation to the assessment against purpose 1, 'regular' boundaries are those comprising well defined or rectilinear built-form edges to the large built-up areas. (All other text to be deleted) .
SAC	Special Area of Conservation A SAC protects one or more special habitats and / or species – terrestrial or marine – listed in the EU Habitats Directive.
SNCI	Site of Nature Conservation Interest SNCIs are sites which contain features of substantive nature conservation value at a local level.
SPA	Special Protection Area A SPA protects one or more rate, threatened or vulnerable birds species listed in Annex 1of the EU Birds Directive, and regularly occurring migratory species.
Sprawl	The outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way.
SSSI	Special Site of Scientific Interest SSSI are areas of special interest due to their fauna, flora, geological or physiographical features.
Strong Unspoilt Rural Character	Land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.
Urban Character	Land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.
Wider Gap	A gap between settlements where limited development may be possible without coalescence between them.