

Number	Paragraph /Policy	Issue raised through consultation	Officer Response
General issues			
4.01		Opposition to development on Green Belt land. With respondents citing the purposes of the Green Belt as reasons to prevent development.	<p>No amendment in response to this issue</p> <p>The Council has tried to utilise brownfield land as far as possible but only a small proportion of the housing need can be met in this way. Greenfield development is therefore necessary in order to meet identified housing needs. The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable or deliverable approach.</p> <p>Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.</p>
4.02		Opposition to development on Green Belt land as it would create urban sprawl.	<p>No amendment in response to this issue</p> <p>Planned development would not constitute sprawl, which is by definition uncontrolled.</p>
4.03		Most of this chapter replicates NPPF and is therefore not necessary.	<p>Proposed amendment to Plan in response to this issue</p> <p>Agreed, there is a case for the rationalisation of the chapter to avoid replicating the NPPF. However, there is an expectation that the District Plan contains reference to Green Belt policy.</p>
4.04		Thorley Parish Council and others comment that when loss of Green Belt is unavoidable it must be policy that additional land receives Green Belt designation (within the District), to compensate the loss.	<p>No amendment in response to this issue</p> <p>It is acknowledged that the NPPF makes provision for the creation of compensatory Green Belt and contains a set of criteria against which new Green Belt should be considered (para. 82). It is not considered that any exceptional circumstances arise in the proposed Plan that justify the creation of new Green Belt. It is considered that normal planning and development management policies would be adequate for the Council to successfully defend its position.</p>
4.05		Consideration must be given to providing natural green spaces and public leisure facilities beyond the Green Belt (in the countryside) to compensate for intensification of areas with little open space.	<p>No amendment in response to this issue</p> <p>The Plan requires developments to provide sufficient open spaces for sport and recreation on site, or make a contribution to enhancements of existing open spaces. Where a site is on the edge of an existing settlement, the Plan requires developments to ensure connectivity between the site and the existing community and to the wider countryside beyond the site through the retention and or creation of new Public Rights of Way.</p> <p>The NPPF contains guidance as to what can be constructed in and beyond the Green Belt. The</p>

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			construction of leisure facilities beyond the Green Belt (i.e. in the Rural Area Beyond the Green Belt) is unlikely to represent sustainable patterns of development. If such facilities are proposed, there would be a judgement made as to their suitability in terms of sustainability which would include their accessibility and their impact on the countryside.
4.06		Great Amwell Parish Council supports no amendments to Green Belt boundaries in its locality.	No amendment in response to this issue Acknowledged.
4.07		The Green Belt must be protected from development- a new town or garden city should be built perhaps to the north of the district.	No amendment in response to this issue Only the lower third of the District is within the Green Belt. The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable approach as it cannot be proven to be deliverable with supporting infrastructure within the Plan-period.
4.08		Local people hold Green Belt land dear. It is important that the principles of sustainability clearly apply and that development occurs on Green Belt land only in exceptional circumstances.	No amendment in response to this issue This approach is acknowledged in the strategy. Housing need represents the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.
4.09		Thorley Parish Council, Hertingfordbury Parish Council and others comment that unmet housing needs do not constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.	No amendment in response to this issue Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016.
4.10		Opposition to “carefully selected Green Belt releases in locations adjacent to towns”. This is against the whole ethos of Green Belt which looks to separate settlements and prevent coalescence of urban areas.	No amendment in response to this issue Officers consider that there are no circumstances where the planned release of Green Belt will cause coalescence of settlements.
4.11		Who decides which parts of the Green Belt are to be “carefully selected for release”?	No amendment in response to this issue An independent review of the Green Belt has been undertaken and Officers consider the recommendations of this in the light of all evidence and other planning considerations. It is for the full Council to endorse the proposed Plan which will then be subject to an examination in public held by the Planning Inspectorate.

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4.12		Particular effort must be made to ensure that buffer zones around villages are preserved e.g. Great Amwell.	<p>No amendment in response to this issue</p> <p>There is no 'buffer zone' approach to development. Green Belt policy in itself is a barrier to development around Green Belt villages.</p>
4.13		This plan applies Green Belt policy to the majority of the district, which is not so designated.	<p>No amendment in response to this issue</p> <p>East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p>
4.14		There are deliverable sites within the settlements which have not been fully explored which could have an impact on the required level of Green Belt release.	<p>No amendment in response to this issue</p> <p>The Council has always sought to bring forward brownfield sites wherever possible. This includes the Goods Yard in Bishop's Stortford and the Mead Lane area in Hertford which are proposed for allocation within the District Plan. However, being a predominantly rural district, there are very few brownfield sites available. Therefore development on greenfield sites is required.</p>
4.15		Hertford Civic Society and others consider that the District Plan does not set out exceptional circumstances required to justify alteration to Green Belt boundaries. The resulting Green Belt boundaries would not have the permanence required by NPPF.	<p>No amendment in response to this issue</p> <p>Housing need does represent the exceptional circumstances required to review the Green Belt. This was confirmed by a Planning Inspector during an advisory visit to the Council in early 2016. Proposed outer boundaries of allocated sites are defined along identifiable features. It is also possible to ensure existing boundary features are more robust through development.</p>
4.16		Removing areas of Green Belt can only be negative especially since it will be almost impossible to designate new Green Belt areas according to PPG.	<p>No amendment in response to this issue</p> <p>The Council has tried to utilise brownfield land as far as possible but only a small proportion of the housing need can be met in this way. Greenfield development is therefore necessary in order to meet identified housing needs. The Council could adopt a strategy whereby no Green Belt land is released, however this would result in having to provide significantly more development within the more rural area to the north of the District which is not considered to be a sustainable or deliverable approach. As such, if the Council is to meet its objectively assessed housing needs in full as also required by the NPPF and PPG, it is necessary to allocate land for development that will result in the loss of Green Belt land.</p>
4.17		It should be made clear that the objective remains that Green Belt land should retain clearly defined	<p>No amendment in response to this issue</p>

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		man-made or natural boundaries.	Proposed outer boundaries of allocated sites are defined along identifiable features. It is also possible to ensure existing boundary features are more robust through development, such as via planting and layout considerations.
4.18		The broad locations need to be decided as part of this plan. Currently the plan comments that very little land is being taken from the Green Belt, however at the same time it shows the majority of future housing to be on present Green Belt land (broad locations).	<p>No amendment in response to this issue</p> <p>Since the Preferred Option Consultation, a considerable amount of work has been undertaken to progress the Broad Location options and it is now the view of Officers that these should become allocated sites in the District Plan.</p>
4.19		NPPF makes it clear that if the open character of a village makes an important contribution to the openness of the Green Belt it should be included in or washed over by the Green Belt, but where not, it should be excluded. There is no evidence of the council applying this national policy.	<p>No amendment in response to this issue</p> <p>The Council is not proposing to remove villages from the Green Belt where they are currently washed over. Paragraph 89 permits limited infilling within Green Belt villages and an assessment of the impact of an infilling proposal on the openness of the village would be considered as part of the planning application process.</p>
4.20		The Council has failed to consider small sites that “round off” Green Belt boundaries.	<p>No amendment in response to this issue</p> <p>In many circumstances, smaller sites may still make a contribution to Green Belt purposes. The process of reviewing Green Belt boundaries is set out in the NPPF, which does not include ‘rounding-off’ boundaries. In some locations, it is appropriate to amend the Green Belt boundary in order to ensure the robustness of the boundary having regard to their permanence in the long term. These sorts of locations have been considered through the Settlement Appraisal process.</p>
4.21		The Labour Party comments that the District Plan allows the examination of Green Belt boundaries to consider if all the land meets the criteria for Green Belt. It also needs to be re-appraised to check that it is not inhibiting sustainable development which could enhance the local area.	<p>No amendment in response to this issue</p> <p>Agreed. A Green Belt Review has been undertaken and amendments to the boundary are proposed to secure a sustainable pattern of development across the district.</p>
4.22	4.1.3	Objection to the non-inclusion of the North and East of Ware from the list of sites to be released.	<p>No amendment in response to this issue</p> <p>It is the view of Officers that land to the north of Ware should be allocated for development in the District Plan for 1,000 homes, with land for a further 500 homes safeguarded for development beyond the Plan-period. This issue is considered further through the Ware Settlement Appraisal.</p>

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4.23	4.1.3	Thorley Parish Council does not agree that development outside the Green Belt would be unsustainable or contrary to NPPF.	<p>No amendment in response to this issue</p> <p>It is correct that some development in settlements beyond the Green Belt may be considered to be sustainable. However, these sites alone would not be capable of accommodating the District's needs.</p>
4.24	4.1.3	The wording of 4.1.3 suggests that there is availability for housing on brownfield sites. These options should be further assessed and not dismissed.	<p>No amendment in response to this issue</p> <p>The Council has always sought to bring forward brownfield sites wherever possible. This includes the Goods Yard in Bishop's Stortford and the Mead Lane area in Hertford which are proposed for allocation within the District Plan. However, being a predominantly rural district, there are very few brownfield sites available. Therefore development on greenfield sites is required.</p>
4.25	4.1.5	Hertford Civic Society objects to the release of land and Hollybush Primary School and Sele School. The Green Belt Review recommendations are not sound.	<p>No amendment in response to this issue</p> <p>As development is planned to the west of Hertford, these school sites would no longer be on the edge of the town and therefore would not contribute to the purposes of the Green Belt as defined by the NPPF. Other policy designations remain that can be used to manage development on these sites.</p>
4.26	4.1.5	HCC welcome the removal of Hollybush Primary School, Sele School, Leventhorpe School and Mandeville Primary School from the Green Belt.	<p>No amendment in response to this issue</p> <p>Support noted and welcomed.</p>
4.27	4.1.5	HCC considers that a number of schools in East Herts are on the edge of settlements where the Green Belt boundary could be amended to include the school site within the built up area. These include: Hillmead Primary School, St Joseph's Catholic Primary School, Morgans Primary School, Simon Balle School, Reedings Junior School, Priors Wood Primary School, Sacred Heart Catholic Primary School and Watton-at-Stone Primary School.	<p>No amendment in response to this issue</p> <p>In general the Council has not sought to remove school sites from the Green Belt. The potential need to expand schools is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Proposals should therefore be pursued through the planning application process.</p>
4.28	4.1.5	<p>HCC suggests (in order of preference) that consideration is given to:</p> <ul style="list-style-type: none"> • The removal of Green Belt designation from school sites. 	<p>No amendment in response to this issue</p> <p>It is the view of Officers that it is unnecessary to remove these schools from the Green Belt (see Issue 4.27).</p>

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		<ul style="list-style-type: none"> The identification of MDS status for those schools which are currently washed over by the Green Belt. The revision of those school sites with MDS status to review whether the boundaries of the site enable the growth required to meet any increase in needs as a result of further development. 	<p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development. Officers propose the removal of the MDS section. Therefore, the impact of proposals will be dealt with on a case by case basis. The potential need to expand schools is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Proposals should therefore be pursued through the planning application process.</p>
4.29	4.1.6	<p>HCC considers that the primary school and early years centre at Watton-at-Stone are located outside the village boundary. It would be helpful if the Green Belt boundary could be reassessed to at least exclude the built development (if not whole school site), from the Green Belt.</p>	<p>No amendment in response to this issue</p> <p>This issue will be considered through the production of the Watton-at-Stone Neighbourhood Plan (see also Issue 4.27).</p>
4.30	4.1.7	<p>The plan does not define the broad locations precisely; therefore it does not define the boundaries of the Green Belt which is contrary to NPPF.</p>	<p>No amendment in response to this issue</p> <p>Since the Preferred Option Consultation, a considerable amount of work has been undertaken to progress the Broad Location options and it is now the view of Officers that these locations should become allocated sites in the District Plan. Whilst there is no amendment to the Green Belt chapter as a result of this particular issue, these matters are considered in more detail in the relevant settlement chapters and appraisals.</p>
4.31	GBR1	<p>Policy GBR1 is unnecessary as it duplicates NPPF.</p>	<p>Proposed amendment to Plan in response to this issue</p> <p>Agreed, there is a case for the rationalisation of the chapter to avoid replicating the NPPF.</p>
4.32	GBR1	<p>HCC are pleased that mineral extraction is not listed as inappropriate in the Green Belt and the Rural Area Beyond the Green Belt.</p>	<p>No amendment in response to this issue</p> <p>Support noted.</p>
4.33	GBR1	<p>HCC would wish East Herts to consider revising the Green Belt boundary in light of the allocated waste sites at Cole Green and Westmill. This would be in line with the Waste Sites Allocations Plan.</p>	<p>No amendment in response to this issue</p> <p>An isolated removal of these sites from the Green Belt would not be appropriate, resulting in an illogical pattern of Green Belt. If there was a larger change to the Green Belt, for example in tandem with development then this approach would be suitable.</p>
4.34	GBR1	<p>Stevenage Borough Council state that the plan does not make provision to review the Green Belt</p>	<p>No amendment in response to this issue</p>

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		to the east of Stevenage. A small scale development here has potential to meet development needs.	This issue will be considered through the Stevenage Settlement Appraisal. Since the Preferred Option Consultation, a considerable amount of work has been undertaken to assess land to the east of Stevenage. It is now the view of Officers that a site should be allocated for development in the Pre-Submission Plan. Whilst there is no amendment to the Green Belt chapter a new chapter on land to the East of Stevenage and the supporting Settlement Appraisal considers this issue in more detail.
4.35	GBR1	Stevenage Borough Council considers a safeguarding approach is required at Stevenage in order to ensure long term development requirements are not compromised.	No amendment in response to this issue Since the Preferred Options consultation, Stevenage Borough Council have submitted their Plan to the Planning Inspectorate and have not identified a need within this Plan period to look beyond the Borough boundary. It is impossible at this stage to determine what the longer term requirements will be and how to plan for that at this current stage.
4.36	GBR1	Bishop's Stortford North Consortium comments that the council should be clearer about which uses are not inappropriate development within the Green Belt. Reference to playing fields, recreation and open space should be identified as not being inappropriate.	No amendment in response to this issue Recent cases indicate that such uses can be considered as inappropriate within the Green Belt. Regardless of this, the policy is to be amended to refer to the relevant NPPF paragraphs. See Issue 4.31 above
4.37	GBR1	Datchworth Parish Council request the addition of the following to this policy, "Such redevelopment will not be permitted if it would generate traffic that by its quantity or size will be inappropriate for the existing highways within and serving the nearby area. Highway improvements to serve re-development of brownfield sites will not be permitted other than as a result of and associated with a Neighbourhood Plan process."	No amendment in response to this issue Highway impacts and improvements are not a Green Belt chapter issue. Whilst a Neighbourhood Plan could set out potential mitigation measures in relation to development, such matters would be dealt with through the planning application process.
4.38	GBR1, Part II (c) & (g)	HCC welcomes part II, (c) and (g) if they would allow for the expansion of schools located in the Green Belt to meet the increase demand for places.	No amendment in response to this issue Support noted. However, the policy is to be simplified to avoid repetition of the NPPF. See Issue 4.31 above.
4.39	GBR1, Part II (d)	Policy HOU8 would be more appropriately included in this Green Belt chapter as it relates to replacement buildings in the Green Belt.	No amendment in response to this issue Comment noted. Policy HOU8 will be deleted and matters related to replacement buildings will be considered in accordance with Policies GBR1 and GBR2. A new paragraph (14.12.3) to be added to the Housing Chapter referring the reader to Chapter 4: Green Belt and Rural Area

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			Beyond the Green Belt.
4.40	GBR1, Part II (e)	Since boundaries are being drawn around group two villages this is effectively removing them from the Green Belt, hence there is no need to include part (e).	No amendment in response to this issue The boundaries are not intended to be a limit to development, but were instead a tool defining the built-up part of the settlement within which limited infilling could be acceptable. The boundary was not a means of removing a village from the Green Belt.
4.41	GBR1, Part III (a)	It appears that mineral extraction in the Green Belt is being used as an excuse to develop sites.	No amendment in response to this issue There is no presumption that mineral extraction is a precursor to built development. If a site is considered suitable for development, but there are mineral reserves beneath, there is an expectation that the mineral reserve is not sterilised – therefore extraction should occur before the planned development.
Rural Area Beyond the Green Belt			
4.42	GBR2	Policy GBR2 uses the same wording as GBR1 and applies it to areas that are not Green Belt. This undermines Green Belt policy and NPPF. If the council wishes to implement countryside policies they should be different from Green Belt policies.	No amendment in response to this issue East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.
4.43	GBR2	HCC comments that the boundary of the rural area beyond the Green Belt at Buntingford should be revised to exclude sites of Edwinstree Middle School, Freman College and Layston First School. These sites should be included within the town boundary.	No amendment in response to this issue The settlement boundary around Buntingford will be redrawn to reflect the latest position in terms of development. The settlement boundary will therefore include the schools within the town boundary. Whilst there is no amendment to the Green Belt chapter in response to this issue, this issue is considered in more detail in the Buntingford Issues Report.
4.44	GBR2	This policy should be adjusted to exclude the area of west Buntingford.	No amendment in response to this issue It is the view of Officers that this site should not form part of the Development Strategy. This issue is considered in the Buntingford Issues Report and Settlement Appraisal.
4.45	GBR2	The Canal and Rivers Trust comments that it should be recognised that waterways are non-footloose assets and the facilities required to support their function are non-footloose too. Facilities should be located adjacent to the waterspace they serve. The wording of this policy	No amendment in response to this issue Part II. (b) already refers to appropriate facilities for outdoor sports and recreation as being exceptions to this policy, which this sort of use would fall within. It is not considered necessary to add specific reference to waterspace uses in this policy.

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		may need widening to allow development required to service existing outdoor recreational facilities.	
4.46	GBR2	Bishop's Stortford Civic Federation and others comment that this area should not be subject to policies as restrictive as those applying to Green Belt.	<p>No amendment in response to this issue</p> <p>East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p>
4.47	GBR2, Part II, (c) & (g)	HCC welcomes part II, (c) and (g) if they would allow for the expansion of schools located in the Green Belt to meet the increased demand for places.	<p>No amendment in response to this issue</p> <p>In general the Council has not sought to remove school sites from the Green Belt. The potential need to expand schools is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Proposals should therefore be pursued through the planning application process.</p>
4.48	GBR2. Part II (e) & (f)	Objection to part (e) and (f) as these are contrary to NPPF, villages in the rural area beyond the Green Belt are not subject to Green Belt policy. The wording of these parts should be amended to permit limited infilling in both Group 2 and 3 Villages.	<p>Proposed amendment to Plan in response to this issue</p> <p>East Herts has a long established tradition of restraint on inappropriate development within the Rural Area Beyond the Green Belt. This is a recognition that the environmental assets of the district require an equally protective policy framework and has ensured the protection of the smaller rural settlements, as well as the wider area of countryside.</p> <p>Policy GBR2 will be updated to reflect the latest approach to development in the villages.</p>
4.49	GBR2, Part II (e)	Since boundaries are being drawn around Group two villages this is effectively removing them from the Green Belt, hence there is no need to include part (e).	<p>No amendment in response to this issue</p> <p>This policy refers to villages outside of the Green Belt. The boundaries are not intended to be a limit to development, but were instead a tool defining the built-up part of the settlement within which limited infilling could be acceptable in line with a general approach of restraint within the rural area.</p>
Major Developed Sites			
4.50	4.3.1	The major developed site boundary for Van Hage's has not changed since the 2007 allocation. This boundary should be amended to include the existing built form (including the car park).	<p>No amendment in response to this issue</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. While there is no amendment in response to this issue in particular,</p>

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4.51	4.3.3	HCC comments that it appears to be inconsistent that one school in Buntingford is an MDS whilst the other is not.	<p>No amendment in response to this issue</p> <p>The town boundary will be redrawn in response to recent developments. Therefore Freman College would come within the built-up envelope of the town and will no longer be defined as a Major Developed Site in the rural area. This issue is considered in more detail in the Buntingford Issues Report and Settlement Appraisal.</p>
4.52	GBR3	The University of Hertfordshire Campus at Bayfordbury should be included in the Major Developed Sites category. This will protect the existing campus and enhance its future capabilities.	<p>No amendment in response to this issue</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section. Regardless of this, the collection of buildings in use by the University is not conducive to being defined as a Major Developed Site. Apart from the teaching building, the built form is limited to glass houses and observatories, which are spread across the site. The former mansion and mews are not part of the university campus and the whole site falls within an extensive Grade 2 Listed Historic Park. Should the University wish to expand the campus facilities these would have to be mindful of other policy constraints in addition to Green Belt.</p>
4.53	GBR3	Policy GBR3 duplicates NPPF but misinterprets elements, this is not consistent with NPPF.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.</p>
4.54	GBR3	Major Developed Sites have been removed from the NPPF so there is no requirement for this to still be a part of the District Plan.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.</p>
4.55	GBR3	Concern is raised that this policy is too restrictive with regards to the ability of schools to expand.	<p>No amendment in response to this issue</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater</p>

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			impact on the openness of the Green Belt or the purposes of including land within it, than the existing building. Officers propose the removal of the MDS section. Therefore, the impact of proposals will be dealt with on a case by case basis. The potential need to expand schools is considered to represent the 'very special circumstances' required to allow development within Green Belt areas. Proposals should therefore be pursued through the planning application process.
4.56	GBR3, Part II	The NPPF only requires consideration of proposals for infilling against openness.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.</p>
4.57	GBR3, Part II	Wording of the first line requires infilling to be small, the NPPF refers only to limited infilling and does not stipulate size.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.</p>
4.58	GBR3, Part II (b)	This requires height consideration to be taken into account, the NPPF does not stipulate that openness equates to height but rather each site should be considered individually (site specific factors).	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it, than the existing development. Officers propose the removal of the MDS section. The NPPF requires that no greater impact on openness and other factors occurs. Height is clearly a factor to be considered along with mass and orientation when determining an application.</p>
4.59	GBR3 Part II (c)	This imposes specific constrains on development, but NPPF requires only that infilling should be limited.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.</p>
4.60	GBR3 Part III (a)	This requires that proposals should have less impact on openness. This goes beyond NPPF	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p>

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		which requires that proposals should not “have a greater impact”.	The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section.
4.61	GBR3, Part III (b)	Part III (b) is too prescriptive, restricting the height could lead to harmful development where an alternative proposal could be more suitable. For example, where existing buildings are short and wide, taller and narrow buildings may be more appropriate.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section. The NPPF requires that no greater impact on openness and other factors occurs. Height is clearly a factor to be considered along with mass and orientation when determining an application.</p>
4.62	GBR3 Part III (b) & (c)	The Local Planning Authority should as a minimum ensure that skyline development is avoided. Harmful impact might be limited by ensuring that higher land is public open space.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section. The NPPF requires that no greater impact on openness and other factors occurs. Height is clearly a factor to be considered along with mass and orientation when determining an application. The Design and Landscape chapter considers these issues in more detail. Through masterplanning it is possible to minimise the visual impact of development by defining uses that are appropriate for higher areas of land. Lower forms of development may be acceptable in some settings such as single storey buildings.</p>
4.63	GBR, Part III (b) & (c)	These points do not have their root in national policy.	<p>Proposed amendment to Plan in response to this issue (Section 4.3)</p> <p>The Major Developed Sites policy is no longer required as the NPPF allows limited infilling or the partial or complete redevelopment of previously developed sites, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. Officers propose the removal of the MDS section. The NPPF requires that no greater impact on openness and other factors occurs. Height is clearly a factor to be considered along with mass and orientation when determining an application.</p>