

## Richard Crutchley and Claire Sime

On behalf of East Herts District Council

Dear Richard and Claire

### Our reference

T25-0436

### Date

27 March 2025 – updated  
02/04/2025

### Address

250 Waterloo Road  
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### Green Belt / Grey Belt Study

Many thanks for inviting LUC to tender for work to prepare a Green Belt Study for East Herts North Herts and Stevenage. We understand that the Councils are looking for a comprehensive and consistent assessment of the performance of all Green Belt land within the three local authority areas. In line with the latest national policy and practice guidance, the assessment must also robustly define grey belt land which can be used by the Councils to help identify where Green Belt boundaries could be revised to accommodate development needs.

This letter sets out:

- Our overall approach to the assessment of Green Belt/ grey belt.
- Key tasks.
- Programme.
- Indicative costs.
- LUCs relevant experience.

### Proposed Approach

It is essential that the study takes account of the new NPPF and PPG guidance and the terminology used therein. It is particularly important to make sure that the revised assessment aligns with the illustrative features for purposes A, B and D (as set out in paragraph 005 Ref: 64-005-20250225 of the PPG).

We anticipate that the key outputs of the study will be:

- Method Statement - setting out the proposed approach and assessment criteria - to be agreed with the Councils and any other relevant consultees.
- Pilot assessment to demonstrate how the new methodology/ terminology will be applied. This will be important to ensure that both authorities are happy with the proposed assessment outputs before proceeding with the main assessment.

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- Detailed assessment and mapping to clearly identify variations in contribution to the Green Belt purposes.
- Identification of grey belt land, in accordance with the NPPF and PPG definitions.

### Previous Studies

We are aware that previous Green Belt studies have been prepared eg East Herts Green Belt review (2015), North Herts Green Belt Review (2016) and a Green Belt Technical Paper in Stevenage. As outlined above, it will be important to use the terminology employed by the recent grey belt PPG, as those seeking to challenge the findings will inevitably make comparison to the guidance. The PPG uses some terminology which is open to different interpretations, so our methodology will clearly set out our definition of key terms. The PPG focuses on assessing the 'contribution' land makes to the Green Belt purposes so it will be important that the new study uses this specific terminology. We would reference the previous Green Belt studies but we think it is important that the new study starts afresh using the new guidance so that it can be defended robustly at Examination.

### Applicability of Green Belt purposes

A significant element of the PPG is its statements regarding what constitutes a town or a large built-up area: it says that villages should not be treated as either. This is perhaps primarily aimed at deterring the overrating of contribution to these purposes, as some Green Belt studies have applied these purposes to villages. We would clearly set out and agree with the Councils the list of towns to be considered in the study. Our interpretation of the new PPG guidance in relation to Purpose A is that all towns should also be treated as large built-up areas.

### Assessment parcels

LUC's approach to parcelling employs an approach that does not predefine parcels but instead uses an analysis process to identify variations in contribution to the purposes, with parcels being defined to reflect those variations. This means that sites can be overlaid with the assessment findings to identify what contribution they make to the Green Belt purposes without the need for further evaluation.

The assessment will assume a minimum parcel size of 1ha. This is consistent with the level of granularity we will be using in the Welwyn Hatfield and Broxbourne studies. Some parcels will be larger than this but stating the minimum parcel size is important as questions of granularity have been a common point of challenge at local plan examination (the argument that "if the parcel had been smaller the ratings would have been lower"). We will also define 'broad' or 'outer' area parcels for land that is remote from any inset settlement, with the assumption that any strategic development in these would be new inset areas rather than expansion of any existing urban areas.

### Treatment of constrained areas

The NPPF's grey belt definition states that the areas/assets listed in Footnote 7 should not be defined as grey belt if policies relating to their inclusion in the list "would provide a strong reason for refusing or restricting development". For some Footnote 7 designations, such as habitats sites (e.g. SSSI's), we can assume that this will be the case, but in other cases there may need to be a judgement made as to whether a particular development proposal would significantly affect the purposes of the designation. For the latter we will need to include areas in the assessment process rather than dismiss them as being subject to 'absolute constraints', and if they are found to meet the definition of grey belt we can identify them as 'provisional grey belt'. We will agree with the Councils which designations to treat in this way, at the methodology development stage.

### Contribution ratings scale

Assessment rating definitions will need to be amended to reflect the PPG. For the purposes of identifying grey belt the PPG provides illustrative examples of three contribution rating levels: strong, moderate and weak. It is not prescriptive that this scale must be employed, but having a

definitions that correspond to these will be simpler. The NPPF states that any land not making a strong contribution to Purposes A, B or D is grey belt.

There is an option of having a scale that makes some distinction in level of contribution for land that is not identified as grey belt – ie land that will remain as Green Belt – ie adding in a ‘very strong’ rating. The PPG is focused on identifying grey belt but housing need and sustainability considerations may well require the Councils to consider release of land which does not meet the grey belt definition and it may be helpful to understand if there are areas of Green Belt that performs ‘very strongly’. We would discuss this further with the Councils.

### Key Tasks

We anticipate that there will be six main tasks required to complete the study as follows:

#### Task 1: Inception meeting

At the outset of the project we will hold an inception meeting to ensure that expectations are clearly understood and aligned from the outset. We will discuss the brief and confirm its scope, finalise GIS data requirements, project output structure and details, project deadlines and any outstanding contractual matters.

#### Task 2: Information Gathering and Initial Analysis

A list of strategic international, national and local constraints within and directly adjacent to the Green Belt will need to be agreed for contextual mapping purposes. As outlined above, the Government’s definition of grey belt ‘excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.’ A list of GIS requirements will be sent to the Councils at project inception. Upon receipt of all the data we will set up the necessary databases and tools for analysing and mapping the data.

#### Task 3: Preparation of Method Statement

A draft method statement will be prepared for review by the Councils. This will outline: the study objectives; geographical and policy context; proposed methodology for assessing Green Belt performance and grey belt; proposed study outputs; and the consultation process.

We recommend a short period of consultation with neighbouring authorities and statutory consultees. We have been appointed to prepare an updated Green Belt Study for Broxbourne and Welwyn Hatfield so feel confident that these methodologies will align. We are also in discussions with Central Bedfordshire to assist them. A two-week consultation period should be sufficient.

Given the need to ensure the objectivity and independence of the study, we do not propose to consult with landowners, site promoters, developers and elected members on the method statements. We would be happy to prepare a covering e-mail for the Councils to send alongside the method statement if helpful.

Following consultation, the methodology will be finalised for the assessment. All consultation comments will be reviewed and recorded in the final report alongside associated actions and the final methodology.

#### Task 4: Pilot Assessment

An example ‘pilot’ study using the agreed method would be prepared to aid the Councils understanding of the practical implementation and outputs of the proposed methodology. The pilot will be presented at a client meeting, talking the Council officers through the assessment process, findings and outputs, providing a further opportunity for written feedback.

#### Task 5: Green Belt Assessment

As outlined above, LUC’s approach to parcelling is based on identifying variations in contribution to each of the NPPF’s five Green Belt purposes. We propose to draw out strategic

variations in contribution to each of the five Green Belt purposes down to a minimum parcel size of 1ha.

The assessment process will be desk-based, but key variations in ratings across the designation will be verified and moderated in the field through field work. All reasonable travel and subsistence expenses associated with site visits would be charged at cost. We would not propose to take photographs for all land parcels for the reasons discussed previously ie this can be subject to challenge as a photo may not representative of an entire parcel.

All of the Green Belt will be rated using the three point scale against each of the five purposes of Green Belt. These judgements will be used to inform:

1. The definition of grey belt land in line with its definition in the NPPF (December 2024) and planning practice guidance (February 2025).
2. Judgements on where Green Belt release/development could fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. This will however require an understanding of which areas the Councils may be seeking to remove from the Green Belt - ie proposed allocations. This assessment would therefore need to follow as a separate report at a later date once proposed allocations have been identified. We have not included costs for this at this stage but typically it would cost around £3-5k.

#### **Task 6: Reporting**

A draft and final report would be prepared for comment on by the Councils.

Assessment parcels will be grouped by settlement (together with the 'outer areas' remote from any inset settlement) with two overview maps for each settlement: one showing the defined parcels and Footnote 7 constraints and the second shaded to show the highest contribution rating for each parcel and the identified grey belt.

We will provide individual overview maps for each Green Belt purpose for the study area as a whole, and also overview maps to show i) the highest purpose rating, and ii) the highest purpose rating excluding Purpose C. The latter two maps will be shaded to indicate how many purposes achieved the highest rating level – e.g. one strong rating, three moderate ratings or all weak ratings.

A summary table will list all the parcels, showing their contribution ratings and indicating whether they are identified as grey belt.

Individual parcel assessments will use a consistent and clear bullet-point proforma format to present a description of the parcel, focused on the relationship between the parcel, the urban area and the wider Green Belt, followed by conclusions on the contribution of each purpose using the terminology employed in the PPG.

The draft and final report will be provided in an accessible format, with an executive summary. GIS mapping of assessment parcels and ratings will also be supplied on completion of the project.

Regular progress meetings would be held with the client group in line with the brief and as agreed at inception.

We would be happy to provide examination support although costs for this can't be estimated at this stage.

#### **Applications**

We are aware that until the Green Belt study is completed, the Councils' development management teams are likely to receive applications for developments within the Green Belt. We would be happy to prioritise some areas in our assessment, to give officers an indication of how they are likely to perform in Green Belt terms and if they are likely to be defined as grey belt.

Depending on the number, scale and level of detail of input required by the development management team, this may require an additional cost. It is not possible to specify the amount of additional cost at this stage due to the factors listed above, but it is anticipated that it will not be more than £20k.

### Costs

Using the scope set out above, we anticipate that the main study will cost an estimated £185k excluding VAT to complete. We would be happy to provide a detailed cost breakdown if the Councils are content with the proposed approach set out above.

As outlined above there may be additional costs relating to judgements on where Green Belt release/development could fundamentally undermine the purposes (taken together) of the remaining Green Belt – 3-5k and the review of planning applications – up to £20k.

### Project timescale

If LUC are commissioned in April, we can meet the following indicative timescales for outputs:

- Methodology and pilot by end of May.
- Draft outputs by end of November.
- Finalised report within two weeks of receipt of comments on full draft.

### LUC relevant experience

LUC is an award-winning environmental consultancy providing planning, impact assessment, landscape design, ecology and digital design services to a wide range of public and private sector clients. With a track record of nearly 60 years and a team of more than 320 skilled professionals including over 120 people working in the strategic planning and development management sector, we bring a passion for the environment and a determination to achieve sustainable development on behalf of our clients.

Our involvement in Green Belt policy development and review is unparalleled. We have completed Green Belt studies for over 65 local authorities across the country (covering well over a third of England's Green Belt land to date). LUC also has considerable experience of regional and sub-regional Green Belt assessments. We have led studies for the 10 authorities of Greater Manchester, five in Oxfordshire, the Greater Cambridge Green Belt, the West of England Combined Authority (WECA) and most of the West Midlands Green Belt authorities. We have also just been commissioned to undertake a review of the London Green Belt. Our extensive Green Belt experience has enabled us to build up an excellent understanding of the interpretation of Green Belt policy, and what constitutes a robust and defensible study. Our work on Green Belts was cited as an important factor in being awarded RTPI Planning Consultancy of the Year in 2019 and 2022 and we were highly commended in the Planning Awards in 2024. We have successfully defended all our Green Belt studies at Local Plan Examinations.

I trust this provides enough information for what you require at the present time. If you have any questions or queries, please don't hesitate to get in touch. We would also be very happy to have another meeting to discuss this further in more detail if helpful.

Yours sincerely

A handwritten signature in black ink, appearing to read "Sarah Young".

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