

East Herts Council Report

Overview and Scrutiny Committee

Date of meeting: 23 June 2026

Report by: Councillor Vicky Glover-Ward – Executive Member for Planning and Growth

Report title: Local Plan: Green Belt Assessment

Ward(s) affected: All Wards

Summary

- Members have agreed to prepare a new Local Plan, including an update of the evidence documents needed to support the new Plan. This report deals with the Green Belt Assessment.
- This work is required given changes to the Government's policy on the Green Belt, particularly the introduction of 'grey belt'. Grey belt is defined as *'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143'*.
- While the assessment does not determine suitability for development, land identified as grey belt is considered sequentially preferable to other Green Belt land where such land is needed to meet development requirements. Previously developed land in the Green Belt is sequentially preferable to 'grey belt' land.
- This information is critical to the preparation of the new Local Plan, particularly in determining the role of Green Belt and grey belt within the overall strategy for the district. It will also assist in development management decisions where promoters are using grey belt as an argument to justify development.
- This report therefore summarises the key findings of the assessment and seeks agreement to use the document as part of

the new Local Plan evidence base, and to inform Development Management decisions.

RECOMMENDATIONS FOR THE DISTRICT PLANNING EXECUTIVE PANEL: that the Executive be advised that:

- A) The Green Belt Assessment, attached as the main report at Appendix A and a series of individual parcel maps and reports at Appendix B (parts 1 to 19), be agreed as part of the evidence base to inform the new East Herts Local Plan and as a material consideration for Development Management purposes in the determination of planning applications.**

1.0 Proposal(s)

- 1.1 The purpose of this report is to advise Members of the completion of the Green Belt Assessment, and to agree it can be used as part of the evidence base for the new Local Plan and as a material consideration in the determination of planning applications.

2.0 Background

- 2.1 Local planning authorities are required to complete a review of their local plans at least once every 5 years from the adoption date to ensure that plans remain relevant. In October 2023, the Council agreed that the East Herts District Plan 2018 needed updating, and that work should commence on updating the technical studies and other preparatory work required to provide a robust evidence base. The intention to formally start plan-making was agreed by Council on 10 June 2026.
- 2.2 A clear, relevant and proportionate evidence base is essential for efficient and sound plan-making to ensure that all future planning policy and decisions are based on up-to-date information. The National Planning Policy Framework (NPPF, 2024) sets out the requirement for the preparation and review of all policies to be, '*underpinned by relevant and up-to-date evidence*' (paragraph 32).
- 2.3 The evidence base consists of supporting documents that will help inform the future policies and site allocations in the new Local Plan. It will cover a range of social, economic, and

environmental topics and help identify local needs, constraints and opportunities. Because of the nature of the Green Belt Assessment and its potential to influence policy formulation, it is considered appropriate to include it within the Council's evidence base.

- 2.4 A previous Green Belt Assessment was published in 2015 to inform the policies and development strategy in the adopted District Plan. It provided information about the way Green Belt performed against the five purposes set out in the NPPF as it existed at the time, and informed policy and development approaches.
- 2.5 The current Green Belt Assessment replaces this work. The Council commissioned consultant LUC to produce the study. LUC have been engaged in similar assessments in the region (including Broxbourne and Greater London) and have wide experience in such assessments across the country. This study was commissioned jointly with North Herts and Stevenage using funds provided specifically for the purpose through a MHCLG grant.
- 2.6 The government's approach to the Green Belt has changed significantly in the last two years, and is set out in the most recent iteration of the NPPF. Whilst the five purposes that the Green Belt serves remain unchanged (see para 2.8 below), and the essential characteristics of Green Belt remain its openness and permanence, the NPPF's most significant change relates to the introduction and definition of 'grey belt' land. Driven by a need to deliver an uplift in housing completions nationally, grey belt is a means of identifying Green Belt land which does not strongly contribute to the five purposes (specifically, three of the five purposes). The requirement for the Green Belt Assessment comes from the need to identify grey belt land. MHCLG provided grant funding to speed up the progress of Green Belt Assessments amongst local planning authorities.
- 2.7 As mentioned above, the Green Belt serves five purposes, and they are:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;

- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.8 The methodology for a Green Belt Assessment is set out in national Planning Policy Guidance (PPG). It includes the terms, definitions and criteria for the assessment to ensure that they are carried out in a clear and consistent way across the country.

2.9 It is important to note that land identified as grey belt remains Green Belt land. Grey belt land can consist of previously developed land or greenfield land. Land identified as grey belt has only been defined as not contributing strongly against the five purposes (and specifically purposes (a), (b) and (d)). It is not an indication of its suitability for development, nor an indication of a need to alter Green Belt boundaries. National policy is clear that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation and updating of plans, and exceptional circumstances include where an authority cannot meet its identified need for homes. The district cannot currently demonstrate a five-year housing land supply.

3.0 Reason(s)

3.1 East Herts District Council (EHDC), North Herts District Council (NHDC) and Stevenage Borough Council (SBC) jointly appointed LUC to produce a comprehensive strategic Green Belt Review across the three authorities. The review was prompted by changes to the approach to Green Belt instigated by the Labour Government's approach to housebuilding, and to the introduction of 'grey belt' as a distinct element of the Green Belt that is effectively sequentially preferable to the release of other Green Belt land where such a release is deemed necessary.

3.2 Across the three Councils, Green Belt forms a constituent part of the Metropolitan Green Belt that surrounds London, which continues south and west into the remainder of Hertfordshire and south and east into Essex. Within East Herts, Green Belt is predominantly located in the south west of the district, surrounding Hertford and Ware and reaching to the boundaries of Welwyn Hatfield and Broxbourne Councils. It skirts the southern

boundary with Epping Forest and Harlow and then surrounds the towns of Sawbridgeworth and Bishop's Stortford to the east.

- 3.3 The primary purpose of the assessment is to identify and define the extent and location of grey belt land within the district, and to evaluate its contribution to the strategic Green Belt provision across East Herts. In doing this, it supports plan-making work in understanding the role and function of the Green Belt as it exists in East Herts District and as it relates to neighbouring authorities. It is a key piece of work in terms of developing a strategy to accommodate the district's future needs, alongside other evidence relating to availability of land and the village hierarchy.
- 3.4 The main report is attached at **Appendix A**, and the individual parcel maps and reports of the district's Green Belt are attached at **Appendix B (parts 1 to 19)**.

Main Report

- 3.5 The report, in Chapter 2, explains the context for the assessment, and explains the Government's policy as set out the NPPF. This includes commentary around the five purposes and the exceptional circumstances required in order to alter Green Belt boundaries, which includes the inability to meet housing needs after all other reasonable options for meeting need are exhausted. It also covers the origin of grey belt, its definition in respect of purposes (a), (b) and (d) and that, sequentially, grey belt land is preferable to Green Belt land when exceptional circumstances can be demonstrated, but not preferable to previously developed land.
- 3.6 The report also sets out the conditions that must be met if grey belt land is to be utilised in exceptional circumstances. Therefore, development in the grey belt would not be inappropriate, provided that:
- it would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
 - there is a demonstrable unmet need for the type of development proposed;
 - the development would be in a sustainable location (with particular reference to NPPF paragraphs 110 and 115); and

- the development would, where applicable, meet the ‘Golden Rules’ set out in NPPF paragraphs 156-157 (essentially a requirement to secure affordable housing, meet infrastructure requirements and provide access to green space).

- 3.7 It is important to note again that the assessment is only an exercise in identifying areas of grey belt against the five purposes; it is not an indicator of areas that are suitable or appropriate for development, and it does not justify exceptional circumstances or demonstrate compliance with the conditions set out above.
- 3.8 The report also makes detailed comments on the methodology for undertaking a Green Belt Assessment (Chapter 3), the structure of which is set out in the PPG. This requires time in the document because although every effort is made to make the assessment consistent and objective nationally, circumstances and approach may still vary from place to place and between consultants, areas and authorities. Time is therefore spent defining terms and phrases and explaining how they will be applied and what they mean. This includes terms like ‘large built-up area’, ‘free of existing development’ and ‘other urbanising influences’ all of which are factors within the assessment of purpose A. It also explains the approach to so-called ‘footnote 7’ areas and assets, which include significant heritage and conservation assets, and are excluded from consideration as grey belt because these would provide a strong reason for refusing or restricting development.
- 3.9 Chapter 3 covers in detail some of the definitions that apply to the assessment of Green Belt and the determination of grey belt. The first step is one of defining the parcels to which the assessment applies, and the parcels are defined by examining variations in the relationship between urban and open land. The definition of grey belt then depends on assessing how each parcel performs as Green Belt against purposes (a), (b) and (d). Importantly for this assessment, large built-up areas / towns are defined in East Herts as Bishop’s Stortford, Hertford, Sawbridgeworth and Ware and in relevant adjoining districts as Stevenage, Welwyn Garden City, Hoddesdon and Harlow. All four East Herts towns are also considered to be historic towns for purpose (d), whereas this element is not relevant in the assessment for the towns in adjoining districts.

3.10 Chapter 4 of the report sets out the findings of the assessment. It does this in two ways; firstly, through a series of overview maps that show all of the parcels across the study area and how they perform against each purpose and show what this means for its status as Green Belt or grey belt and, secondly, via a table that lists the parcels alphabetically by area and similarly gives the performance against the purposes. The outcomes are also colour coded, with blue showing a strong contribution. Any parcel that performs strongly against just one of the purposes (a), (b) or (d) will not be considered to be grey belt. Performance of any parcel against purpose (c) is also recorded, but this outcome does not contribute to the assessment of grey belt. Purpose (e) is considered to act equally on all parcels. The maps in the report have limitations, particularly as some of the smaller parcels are difficult to see at this scale, and therefore the individual maps in **Appendix B** will be required to see a full picture.

Individual parcel maps and report

3.11 As the report can only provide an overview of the assessment, it is supported by an individual report for every defined parcel. These individual parcel maps and reports are provided in **Appendix B**. There are 260 parcels in East Herts, with four of these crossing into a neighbouring authority within the study area.

3.12 The individual reports are grouped by settlement, as set out below:

- Bishop's Stortford (BSNE1-BSNE11, BSNW1-BSNW5, BSS1-BSS17, BSW1-BSW10 – 44 parcels, Appendix B1 to B4)
- Datchworth (DT1-DT14 – 14 parcels, Appendix B5)
- Harlow (HA1-HA6 – 6 parcels, Appendix B6)
- Hertford Heath (HH1-HH12 – 12 parcels, Appendix B7)
- Hertford (HFN1-HFN24, HF1-HF17, HFW1-HFW16 – 57 parcels, Appendices B8 to B10)
- Hoddesdon (HO1-HO8 – 8 parcels, Appendix B11)
- Sawbridgeworth (SB1-SB25, SBS1-SBS16 – 41 parcels, Appendix B12 and B13)
- St. Margaret's (SM1-SM13 – 13 parcels, Appendix B14)

- Stevenage East (SE1-SE9, SE12-SE18 – 16 parcels, Appendix B15)
- Tewin (TW1-TW8 – 8 parcels, Appendix B16)
- Ware (WN1-WN14, WS1-WS18 – 32 parcels, Appendices B17 and B18)
- Watton-at-Stone (WA1-WA9 – 9 parcels, Appendix B19)

3.13 Within each settlement group, the first three pages offer a general overview of the whole area, including a guide to the location of the parcels, the location of grey belt and the highest rating against the purposes. Following this, the individual parcels are assessed in alphanumeric order in a consistent format with maps of the individual parcel followed by a description of the parcel, the assessment of the parcel against each purpose and a conclusion as to whether the parcel is considered to be grey belt. It should be noted that within Stevenage East, parcels SE10 and SE11 are wholly within Stevenage Borough and SE3, SE5, SE6, SE13 and SE15 cross over the district boundary into Stevenage to a limited degree.

3.14 With such a wide range of parcels in different locations and circumstances across the district, it would be difficult to pick out all of the detail and members are advised to focus on those parcels of greatest interest to them and their constituencies. However, some broad patterns can be expressed:

- Contributions to purpose A (to check the unrestricted sprawl of large built-up areas) are strongest in more open areas close to the edge of the district's main towns. It is not strong further from these main towns, around villages and where development exists, or within fingers or pockets of land that come into the main towns;
- Contributions to purpose B (to prevent neighbouring towns merging into one another) are strong where the gap between towns is more fragile, including between Hertford, Ware and Hoddesdon and between Sawbridgeworth and Bishop's Stortford. This is inevitably not strong where there are no neighbouring towns or where towns are more distant from one another;
- Contributions to purpose C (to assist in safeguarding the countryside from encroachment) are generally strong everywhere in the study area except where built

development dominates. This tends to be very close to urban areas and in larger villages;

- Contributions to purpose D (to preserve the setting and special character of historic towns) is only strong where there is a clear visual, physical or experiential link to historic elements of a defined historic town. The extent of parcels performing strongly against this purpose is therefore very limited;
- Grey belt areas tend to be smaller parcels close to urban areas where existing development is already very present and / or where historic features are absent, in areas outside of the main towns where development is quite prominent (e.g. larger villages and larger employment areas in rural locations) and in open countryside where distances to built-up areas are greater.

3.15 As discussed above, the assessment does not consider a parcel's suitability for development or its role in the wider green belt. The findings will be considered in developing the strategy for the Local Plan alongside other relevant evidence, which includes the call for sites submissions, the Strategic Housing Land Availability Assessment (SHLAA), the village hierarchy and others.

3.16 The report, in the last part of Chapter 4, makes some comments on the more strategic role of Green Belt, drawing on the NPPF guidance that development in the Green Belt will be inappropriate where it would fundamentally undermine its role as a whole. It highlights particular concerns with the fragile gaps between Hertford, Ware and Hoddesdon and the role of the A10 in providing a separating role, as well as the proximity of Stanstead St. Margaret's and Hertford Heath to large urban areas.

3.17 The final chapter of the report, Chapter 5, discusses the next steps. The report only makes an assessment of Green Belt land in the district against the five purposes, and identifies those areas that do not perform strongly as grey belt. It is for the Council, in preparing the Local Plan, to determine whether there is sufficient land for meeting the district's housing needs and if there are exceptional circumstances present that would justify changes to Green Belt boundaries. The Council has not yet completed this process, although this will be part of forthcoming work on the plan strategy.

3.18 In making any future decisions about the plan strategy, especially if the releasing of Green Belt (including grey belt) sites is considered to be required, regard will have to be given to any impact upon 'footnote 7' sites (see para 3.9 above) and to the impact on the Green Belt as a whole. In addition to this, any proposed Green Belt release will also have to consider the sustainability of such a release because the NPPF dictates that where land is not in a location that is, or can reasonably be made, sustainable, its release for development would be inappropriate. Should Green Belt release be necessary, the NPPF also looks to ensure that any new Green Belt boundaries are clearly defined and likely to be permanent, and that beneficial use of the Green Belt is enhanced. Chapter 5 covers these points, but the report itself makes no comment or assessment of these matters.

4.0 Options

4.1 The Council could choose not to agree to endorse the Green Belt Assessment as part of the new Local Plan evidence base. This would mean that the Local Plan would not be able to rely on this evidence to inform emerging policy and strategy, and it could compromise the progression of the plan. It would also likely cause difficulties during the plan-making process, particularly when the Council defends its strategy at the Examination stage. It would also be unavailable to the development management process in providing advice as to the status of land subject to speculative approaches.

5.0 Risks

5.1 If the Green Belt Assessment is not agreed as part of the evidence base, it may be considered as having reduced weight in informing the new Local Plan and planning application decisions. It would mean the Council would not have a current understanding of the status of the Green Belt and grey belt across the district. This is contrary to Government policy to have an up-to-date evidence base and could undermine the Council's position in terms of successfully bringing forward the new Local Plan.

6.0 Implications/Consultations

6.1 As part of their research, the consultants shared the methodology with neighbouring authorities for comment and to check

consistency. The study will be made available on the website, in the Local Plan Evidence base section, and be subject to a number of statutory public consultations as part of the production of the new Local Plan. Because the study is shared with North Herts and Stevenage, the process of approving and sharing the Assessment is being managed so as not to undermine the decision-making process in those authorities. This report and the Appendices only report on matters pertaining to East Herts Council.

Community Safety

There are no community safety implications arising from this report.

Data Protection

There are no data protection implications arising from this report.

Equalities

There are no direct equality, diversity, or inclusion implications in this report. An Equalities Impact Assessment (EqIA) will be carried out of the new Local Plan in accordance with The Equality Act 2010.

Environmental Sustainability

The purpose of the planning system is to contribute to the achievement of sustainable development. Evidence to support provision and location of employment land has a range of implications for environmental sustainability including how people choose to travel to work and how far they need to travel, the impact of noise and other disturbance from employment uses on other uses and the ability of communities to find the services and facilities they need in the places they live.

Financial

There are no financial implications arising from this report.

Health and Safety

There are no health and safety implications arising from this report.

Human Resources

There are no human resources implications arising from this report.

Human Rights

There are no human rights implications arising from this report.

Legal

There are no legal implications arising from this report.

Specific Wards

No. The Green Belt is confined to the southern parts of the district around the main settlements, but the implications of the assessment for the Local Plan strategy potentially affect all parts of the district.

7.0 Background papers, appendices and other relevant material

7.1 **Appendix A** – Main report.

7.2 **Appendix B (parts 1 to 19)** - individual parcel maps and reports of the district's Green Belt.

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