

# Green Belt Assessment

For East Herts, North Herts and  
Stevenage

## East Herts District, North Herts and Stevenage Borough Councils

**Final report**

Prepared by LUC

June 2026



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**NOTE: Detail results and mapping for North Herts omitted from Version 4.5. All references to North Herts findings to be treated as 'DRAFT'**



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Green Belt Assessment

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# Chapter 1

## Introduction

**1.1** LUC has been commissioned by East Herts District Council, North Herts Council and Stevenage Borough Council to undertake an assessment of Green Belt land across the three local authority areas. This will form part of the evidence base for the Councils' emerging local plans and assist where necessary with the process of identifying and proposing sites for allocation.

**1.2** The assessment reflects changes to Green Belt boundaries that have occurred since previous Green Belt studies. It also takes into account updates to the National Planning Policy Framework (NPPF), including the December 2024 introduction of the concept of 'grey belt' and the requirement for local authorities to review their Green Belt boundaries unless they can meet identified development needs in full. National Planning Practice Guidance (PPG) on the assessment of Green Belt land to identify grey belt was published in February 2025, and this assessment responds to that guidance to ensure that the evidence base for East Hertfordshire, North Hertfordshire and Stevenage remains robust in relation to grey belt.

**1.3** The report is structured as follows:

- **Chapter 2** sets out the context for the study including planning policy in relation to Green Belt, with particular reference to the recent changes to the NPPF and PPG.
- **Chapter 3** sets out the assessment methodology.
- **Chapter 4** summarises the findings of the assessment of contribution to the Green Belt purposes.
- **Chapter 5** provides guidance on how to apply the findings of this assessment for both Plan-making and Decision-making.
- **Appendix A** provides the contribution assessment, with supporting text, map and aerial view, for each identified parcel of Green Belt land (grouped by settlement).

## Chapter 2

### Context

**2.1** This chapter provides a summary of the origins of the Green Belt in the area and sets out the planning policy context relating to the definition and assessment of Green Belt and grey belt.

### Origins and Extent of Green Belt

**2.2** The Green Belt within East Hertfordshire, North Hertfordshire and Stevenage forms part of the wider Metropolitan Green Belt, which was first established in the 1950s following post-war planning policy aimed at containing the growth of London and nearby towns. Its designation was embedded through county-level planning, including the Hertfordshire County Development Plan (approved in 1958), and has since been maintained and refined through successive local plans. The origins of the Green Belt are also closely linked to the designation of Stevenage as a New Town in 1946, with the surrounding countryside protected to prevent coalescence with nearby settlements and to maintain the distinction between urban and rural areas.

**2.3** At the local authority level, Green Belt boundaries have been defined and amended through adopted development plans, most recently through the East Herts District Plan (2018), the Stevenage Borough Local Plan (2019), and the North Hertfordshire Local Plan (2022).

**2.4** Drawing on the [MHCLG's Local Authority Green Belt Statistics for England \(2024–25\)](#), the current extent of Green Belt within each authority is as follows:

- **East Hertfordshire:** Approximately 16,450 hectares of land are designated as Green Belt. This represents 34.6% of the district's total land area.
- **North Hertfordshire:** Approximately 17,590 hectares are designated as Green Belt, equating to 47% of the district's land area.
- **Stevenage:** Approximately 180 hectares of land fall within the Green Belt, representing 6.9% of the borough's land area.

**2.5** The extent of the green belt across the study area is illustrated in Figure 2.1 and remains substantial, particularly in East and North Hertfordshire. The Green Belt plays a key strategic role in maintaining the separation of settlements including Stevenage, Hitchin, Letchworth Garden City, Hertford and Bishop's Stortford, as well as preventing coalescence with larger urban areas such as Luton and Greater London.

## National Green Belt policy

**2.10** Government policy on the Green Belt and grey belt is set out in chapter 13 'Protecting Green Belt Land' [See reference 1] of the NPPF. The Government attaches great importance to Green Belt, and for this reason there is a detailed policy framework in this chapter of the NPPF for both the review of Green Belt boundaries and for determining planning applications for development within the Green Belt.

### Aims and purposes

**2.11** Paragraph 142 of the NPPF states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

**2.12** Paragraph 143 sets out the five purposes of the Green Belt. The stated purposes of the Green Belt are particularly important because the main purpose of the Green Belt Assessment is to assess the extent to which areas of land within the Green Belt contribute to these purposes. As noted at paragraph 2.14 below, the purposes of the Green Belt are also directly related to the definition of Grey Belt. The five purposes 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.

**2.13** The NPPF explains that development in the Green Belt is inappropriate unless covered by one of the exceptions set out in paragraphs 154-155 (see Glossary), and that inappropriate development is by definition harmful to the Green Belt. Paragraph 153 states that, when considering planning applications, 'substantial weight' should be given to any harm to the Green Belt, including harm to its openness.

### Exceptional circumstances

**2.14** The NPPF paragraph 145 states:

‘Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.’

**2.15** Paragraph 146 goes on to state that ‘where an authority cannot meet its identified need for homes, commercial or other development through other means...authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.’

**2.16** Paragraph 147 states that authorities must examine fully all other reasonable options for meeting its identified need for development before exceptional circumstances can be demonstrated. Notable reasonable alternatives include:

- making as much use as possible of suitable brownfield sites and underutilised land;
- optimise the density of development in line with the policies in chapter 11 of the Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

**2.17** Paragraph 148 states that ‘Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework.’

## Grey belt

**2.18** As noted above, the NPPF indicates that, after considering previously developed land, grey belt land should be prioritised for release in order to meet development need. The NPPF’s policies regarding development proposals in the

Green Belt also indicate, at paragraph 155, that development will not be inappropriate if it would utilise grey belt land, as long as:

- 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.

**2.19** The concept of ‘grey belt’ was only introduced into the NPPF in December 2024. It is defined in Annex 2 of the NPPF 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.** ‘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.’

**2.20** The definition of grey belt is important because one of the main purposes of the Green Belt assessment is to determine the extent to which land within the Green Belt contributes to the purposes (a-e) set out at paragraph 143 of NPPG. In turn, this is then used to identify grey belt land that does not make a strong contribution to purposes (a), (b) or (d).

**2.21** With regard to development proposals, if these are on previously developed land (PDL) or grey belt, and are not inappropriate development, substantial weight does not need to be given to any harm to the Green Belt, including to its openness **[See reference 2].**

## Consultation on revised NPPF

**2.22** In December 2025, the Ministry of Housing, Communities and Local Government (MHCLG) published a wide range of proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. A consultation on these reforms ran until the 10th of March 2026. MHCLG is now considering the consultation responses following which it will publish a new version of the NPPF, expected later in 2026.

**2.23** The proposed reforms do not introduce any changes that would affect the Green Belt contribution assessment methodology set out in this report. However, they do

propose an amendment to the definition of 'grey belt', removing the requirement to consider NPPF footnote 7 constraints (other than Green Belt). Should this change be implemented, it would remove the need to classify certain areas in the Green Belt Study as 'provisional' grey belt pending further assessment of whether development would have a significant impact on footnote 7 areas or assets.

Importantly, if this change does go ahead, it would not negate the need to consider the impact of specific development proposals on footnote 7 areas and assets alongside wider sustainability considerations, rather it only removes the need to do so as part of the process of defining grey belt. The guidance note describing the proposed NPPF changes states that the revised definition "seeks to enable grey belt to be identified with greater certainty, whilst continuing to ensure that these areas receive the same level of protection as elsewhere in the Framework."

**2.24** Other proposed changes in the NPPF relating to the Green Belt, whilst not changing the Green Belt contribution assessment methodology set out in this report, if implemented may require consideration during the plan-making and decision-making processes. This includes the approach to housing and mixed-use development around stations defined as 'well-connected' and the application of 'golden rules'.

## National Green Belt Planning Practice Guidance

**2.25** The NPPF's Green Belt policies are supplemented by Planning Practice Guidance [[See reference 3](#)] (PPG, February 2025) on Green Belt planning and how to assess Green Belt land. This section of PPG was substantially re-written in February 2025 and now sets out a detailed methodology for undertaking Green Belt assessments, and how to identify grey belt land, that the Green Belt Assessment follows. This is particularly relevant to the methodology of this study.

**2.26** The PPG makes it clear that strategic or local planning authorities, or appropriate groups of local planning authorities, should produce a Green Belt assessment during the preparation or updating of all Local Plans, and Spatial Development Strategies that set the strategic context for the release of land - where this would be required to meet development needs.

**2.27** The PPG sets out the key steps in a Green Belt assessment, which include:

- defining the location and scale of the assessment area;
- evaluating contribution to the Green Belt purposes;
- considering areas and assets lists in NPPF footnote 7;

- identifying grey belt land; and
- determining if proposals would fundamentally undermine the five Green Belt purposes (taken together) for remaining Green Belt in the plan area.

**2.28** Key points in the guidance relating to the assessment of contribution to the Green Belt purposes are summarised below. The PPG goes on to address the sustainability of development and meeting the ‘Golden Rules’, both of which are relevant to determining whether development would be inappropriate, but these are considerations that lie outside of the scope of this Green Belt Assessment.

## Assessing Green Belt land to identify grey belt land

**2.29** Authorities must identify grey belt land as part of the necessary review and alteration of Green Belt boundaries in order to:

- suitably prioritise sustainable grey belt for any proposals for development allocations in the Green Belt over other Green Belt locations, in line with NPPF paragraphs 147 & 148, through the plan-making process, and
- help determine planning applications on Green Belt land in line with paragraph 155.

**2.30** Importantly, the guidance is clear that ‘where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt, or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land.’ Decisions on planning applications should be informed by an overall application of the relevant policies in the area’s adopted Development Plan and the NPPF (PPG Paragraphs: 010, 011 Reference ID: 64-001-20250225), including whether:

- development is sustainably located;
- whether it would meet the ‘Golden Rules’ contribution (where applicable); and
- whether there is a demonstrable unmet need for the type of development proposed.

**2.31** The principle of sustainability will necessarily also guide the strategic approach to development, both inside and outside of the Green Belt, and inform the assessment of land allocation options during plan-making, in accordance with the principles set out in the NPPF.

## The appropriate scale of Green Belt assessments

**2.32** Authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances. Local circumstances may dictate, for example, the need for smaller assessment areas in areas where there is greater variation in contribution to the Green Belt purposes, or greater potential for sustainable development, such as around existing settlements or public transport hubs or corridors.

**2.33** Villages should not be defined as large built-up areas, towns or historic towns. Where there are no historic towns in or adjacent to a plan area, it may not be necessary to provide detailed assessments against Purpose D.

## Grey belt assessment criteria

**2.34** The PPG sets out illustrative criteria that should be considered when assessing the contribution of land to Green Belt Purposes A, B and D. These are detailed in Chapter 3 below, where it is shown how they have informed the assessment methodology for this study.

## Applying NPPF footnote 7 to the definition of grey belt land

**2.35** Grey belt land cannot be defined on Green Belt land covered by or affecting other NPPF footnote 7 designations (excluding Green Belt) where that designation 'would provide a strong reason for refusing and restricting development'. In such locations, it may be necessary to only 'provisionally identify such land as grey belt in advance of more detailed specific proposals' (PPG Paragraph: 006 Reference ID: 64-006-20250225).

## Assessing the impact of Green Belt release or development on the remaining Green Belt in the Plan area

**2.36** The PPG states that a Green Belt assessment should not be limited to the impact of release or development of grey belt land but any Green Belt land, and requires consideration of fundamental impact to all five Green Belt purposes (taken together) to all remaining Green Belt across the plan area as a whole.

**2.37** Such Green Belt locations should only be discounted for release or development where they would 'affect the ability of all the remaining Green Belt

across the area of the plan from serving all five of the Green Belt purposes in a meaningful way' (PPG Paragraph: 008 Reference ID: 64-008-20250225).

## Identifying sustainable locations in a Green Belt

**2.38** Irrespective of the outcomes of reviewing Green Belt boundaries, when determining applications in the Green Belt or identifying appropriate locations for development in a Local Plan, the need to promote sustainable patterns of development is essential, as set out in paragraph 11 sections (a) and (d) (ii) of the NPPF. These principles should determine whether a site's location would be appropriate for the kind of development proposed. Consequently, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate.

**2.39** The sustainability of specific locations should be determined in light of local context and site or development-specific considerations. Thus, in plan making, the fit of locations with the principles of sustainability will take into consideration factors such as: local geography; infrastructure and connectivity; the specific settlements characteristics and function; climate change; effective use of land; and other relevant constraints and opportunities, including the natural and built environment, physical characteristics, legal covenants, and opportunities for environmental improvement. Furthermore, authorities are required to seek to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115.

## Impact of development on the openness of the Green Belt

**2.40** PPG Paragraph: 013 Reference ID: 64-013-20250225 sets out factors that can be considered in assessing the potential impact of development on the openness of the Green Belt. It states that, where necessary, assessments of the impact of proposals on the openness of the Green Belt must be tailored to the circumstances of the case and may include consideration of a proposals:

- spatial volume, i.e. impact on spatial openness;
- visual impact, i.e. impact on visual openness;
- the duration of development, and its remediability; and,
- the degree of activity, such as traffic generation.

**2.41** Although relating to development proposals, this guidance can help inform judgements relating to the impact that existing development has on Green Belt

openness, which is one of the factors that needs to be considered when assessing contribution to the Green Belt purposes.

## Local Green Belt policy

**2.42** Current local plan policies predate the recent revisions to the NPPF.

### East Hertfordshire

**2.43** The East Herts District Plan 2018 sets out the planning framework for the District for the period of 2011-2033. The Council adopted the District Plan on the 23 October 2018.

**2.44** 'Policy GBR1 Green Belt' states that planning applications within the Green Belt, as identified on the Policies Map, will be determined in accordance with the provisions of the NPPF.

**2.45** The East Herts Green belt was last reviewed in 2015 [\[See reference 4\]](#)

### North Hertfordshire

**2.46** The North Hertfordshire Local Plan 2011-2031 was adopted on Tuesday 8 November 2022 and replaces the saved policies of the District Plan Second Review with Alterations.

**2.47** 'Policy SP5: Countryside and Green Belt' states that the Council will only permit development within the Green Belt where it does not constitute inappropriate development or where very special circumstances can be demonstrated (in line with the NPPF).

**2.48** The North Herts Green belt was last reviewed in 2018 [\[See reference 5\]](#) but the previous review, in 2016 [\[See reference 6\]](#) included analysis of land outside of the Green Belt, between Luton and Stevenage, being considered for potential inclusion in the designated area.

**2.49** Drawing on this analysis, the current North Hertfordshire Local Plan included a substantial addition to the Green Belt, comprising the land lying between strips of Green Belt previously defined to form buffers to prevent the sprawl of Luton and Stevenage. Extending from the A505 in the north to the district boundary near Kimpton in the south, this land was added in response to increased development

pressures, in order to direct development towards more sustainable locations away from open countryside and small villages.

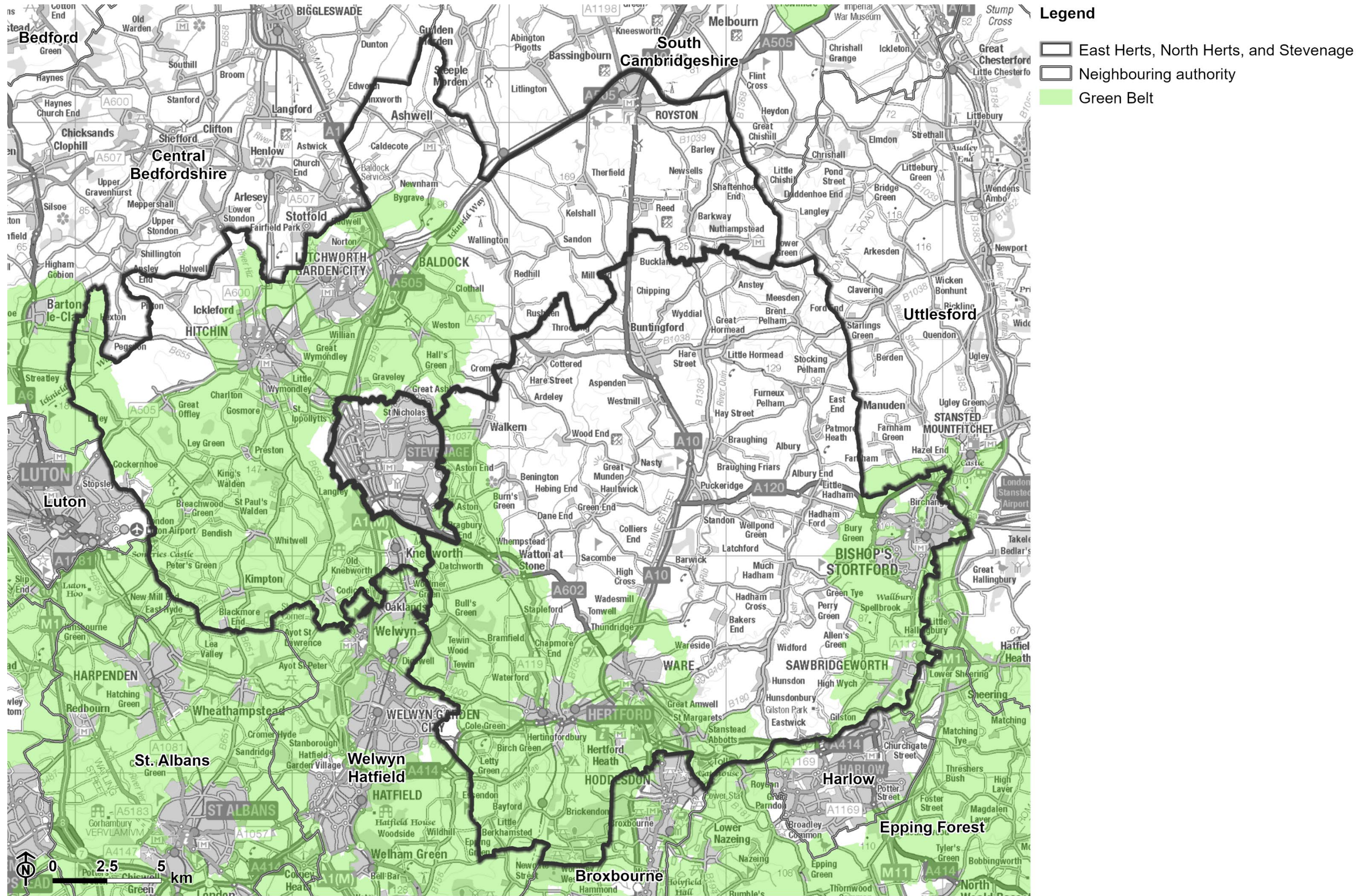
## Stevenage

**2.50** The Stevenage Borough Local Plan 2011-2031 was adopted on 22 May 2019 and replaced the District Plan.

**2.51** 'Policy SP10: Green Belt' states that applications for development in the Green Belt will be made in accordance with national guidance and any other relevant policies. It further states that a Green Belt Review has been undertaken, resulting in the establishment of Green Belt boundaries within the Borough. These boundaries accommodate land released for development during the plan period, as well as areas returned to the Green Belt, thereby allowing for the continued growth of Stevenage to at least 2031.

**2.52** The Green belt around Stevenage was last reviewed in 2015 [[See reference 7](#)].

Figure 2.1: Green Belt Context



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## Chapter 3

# Assessment Methodology

**3.1** This chapter sets out the proposed methodology for the East Herts, North Herts and Stevenage Green Belt assessment, with reference to key planning policy, practice guidance and case law. The February 2025 PPG (outlined above in Chapter 2) is particularly relevant to this method statement.

### General approach

**3.2** The Assessment assesses and presents the contribution that identified parcels of land make to each of the five purposes of the Green Belt (A to E). Contribution to Purposes C and E are not relevant to the identification of grey belt but Purpose C in particular is still an important consideration in planning decisions related to the Green Belt, particularly in scenarios involving the potential release or development of Green Belt land that is not defined as grey belt land.

### The location and scale of assessment areas

**3.3** The PPG states that when assessing Green Belt, local planning authorities must identify an appropriate scale of Green Belt assessment, to allow for recognition of variations in contribution to the Green Belt purposes, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances.

**3.4** This study encompasses all of the Green Belt within East Herts, North Herts and Stevenage. LUC's approach to parcelling of this Green Belt is such that parcels are not predefined but instead use an analysis process to identify variations in contribution to the purposes, with areas being subsequently defined to reflect those variations. As such, the defined assessment areas form part of the final product of the assessment, reflecting and responsive to the range of variations in contribution to the Green Belt purposes. This is an approach that LUC has successfully used in all its recent Green Belt assessments and has been considered robust by inspectors at Local Plan Examinations.

**3.5** The benefits of this approach are that:

- it avoids misleading results where predefined areas have variations in contribution within a parcel that are averaged out.

- it enables the Councils to overlay potential development sites/locations over the findings of the Green Belt assessment to get a clear understanding of the contribution they make to the Green Belt purposes without the need for further evaluation (unless the sites are less than the minimum parcel size identified – see below for further information on the granularity of the assessment).

**3.6** Assessment areas vary in size depending on the range of factors (within and in their immediate vicinity) affecting their contribution to the Green Belt purposes. For example, parcels closer to urban areas are often subject to a greater range of factors influencing their contribution compared to more remote areas in the open countryside, resulting in smaller ‘parcels’ at urban edges and larger ‘outer areas’ in the open countryside respectively.

**3.7** Parcel boundaries typically follow readily recognisable physical features, including natural features such as waterways and water bodies, woodlands and topographical features, and manmade features such as roads and railway lines and field boundaries) where possible. However, their geographic extent is ultimately determined by performance against Green Belt purposes.

## Rating scale

**3.8** The PPG is not prescriptive in terms of the definition of rating scales, but for the purposes of identifying grey belt land it provides illustrative examples of features which would characterise ‘strong’, ‘moderate’ and ‘weak/no’ levels of contribution to the relevant Green Belt purposes (A, B and D). To minimise complexity, this assessment of Green Belt land follows the rating scale referenced in the PPG.

**3.9** Even where grey belt areas are defined through the study, a plan area’s growth needs, other locationally specific development requirements, the need for development to be in sustainable locations, and the specific constraints and opportunities of sites, may still require consideration of the release of Green Belt land that does not meet the grey belt definition. Therefore, Green Belt purposes C and E have also been rated.

**3.10** The ‘strong’ contribution ratings, where applicable to Purposes A, B or D, identify land which does not meet the definition of grey belt (given that land which contributes strongly to Purpose C and/or E can still meet the definition of grey belt land).

**3.11** The release and/or development of land or sites not identified as grey belt may be harder to justify, but NPPF paragraph 148 makes it clear that sustainability should

be a key consideration, with particular reference to NPPF paragraphs 110 and 115 which discuss the need for sustainability in relation to transport.

**3.12** The PPG is not prescriptive in terms of the definition of rating scales but, for the purposes of identifying grey belt land, it provides illustrative examples of features which would characterise 'strong', 'moderate' and 'weak/no' levels of contribution to the relevant Green Belt purposes (A, B and D). To minimise complexity, this assessment of Green Belt land follows the rating scale referenced in the PPG.

**3.13** The splitting of land which does not perform strongly into two levels – moderate and weak/no – is in line with the PPG and will help, alongside sustainability considerations, to inform more nuanced judgements as to what land should be considered for release and development within lower contributing, including grey belt, locations.

## Minimum parcel size

**3.14** The number of parcels resulting from the analysis process is influenced by setting a minimum parcel size. The larger the minimum parcel size, the greater the likelihood that smaller areas may exist within a parcel that performs differently in relation to one or more of the Green Belt purposes than the parcel as a whole.

**3.15** In order to reduce the likelihood of more localised variations in Green Belt contribution and to increase the value of outputs to inform site assessments used for plan-making and decision-taking, the minimum parcel size for the assessment was set at one hectare.

**3.16** Where land in the Green Belt has already been developed, such that any remaining open spaces do not make any significant contribution to the openness of the wider Green Belt, parcels are only defined if the area in question is greater than five hectares in area. This is to avoid a proliferation of small assessments parcels for land with no strategic development potential (due to having already been developed). Smaller areas that lack openness are included within larger parcels and any significant urbanising influence that they have on adjacent open land has been noted.

## NPPF footnote 7 areas and assets

**3.17** The Government's definition of grey belt land '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.' The PPG states in such locations, it may be necessary to only 'provisionally identify

such land as grey belt in advance of more detailed specific proposals' (PPG Paragraph: 006 Reference ID: 64-006-20250225).

**3.18** Footnote 7 states 'The policies referred to are those in this Framework (rather than those in development plans) relating to: habitat sites [\[See reference 8\]](#) (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets [\[See reference 9\]](#) (and other heritage assets of archaeological interest referred to in footnote 75 [\[See reference 10\]](#)); and areas at risk of flooding or coastal change.' This is considered to cover the following designations relevant to the assessment area:

- Special Areas of Conservation (SAC) – include possible SACs;
- Special Protection Areas (SPA) – including potential SPAs;
- RAMSAR sites – including proposed RAMSAR sites;
- Sites of Special Scientific Interest (SSSI);
- Irreplaceable habitats [\[See reference 11\]](#);
- Scheduled Monuments;
- Registered Parks and Gardens;
- Registered Battlefield;
- Conservation Areas;
- Listed Buildings;
- National Landscape;
- Ancient woodland
- Flood risk areas – including Flood Zones 2, 3 and 3b, surface water and ground water flood risk areas;

**3.19** In light of the PPG, these areas and assets have not been excluded from assessment, but where relevant their location and extent has been mapped alongside the findings of the Green Belt contribution assessment. Green Belt land that does not contribute strongly to Green Belt purposes A, B and D and overlaps with these footnote 7 areas and assets has only been 'provisionally' identified as grey belt land. Further detailed work would need to be undertaken by local planning authorities (as necessary through the plan-making and development management processes) to establish the effects of specific proposals on them.

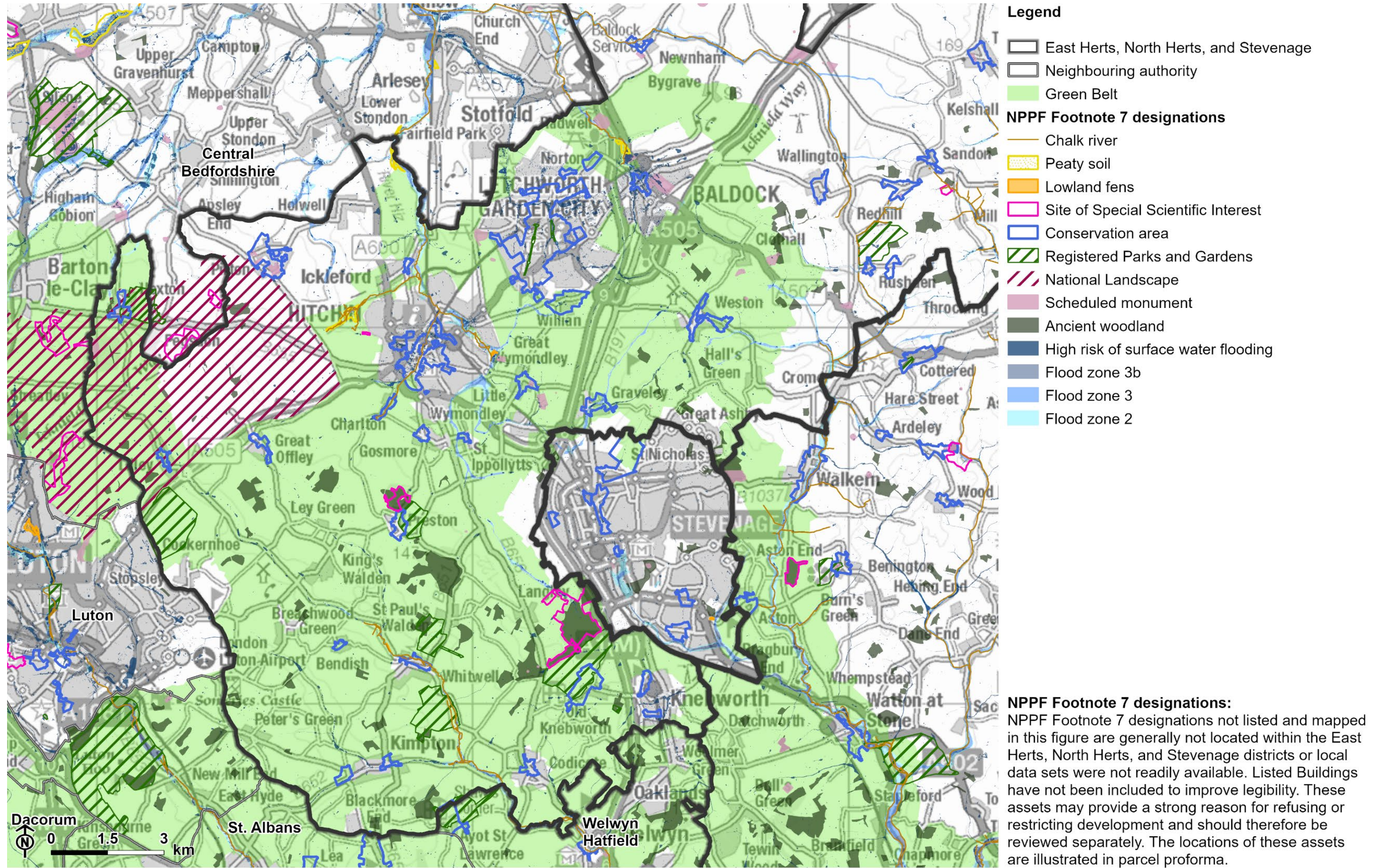
**3.20** Additionally, it may be the case that policies relating to footnote 7 areas/assets have a bearing on the suitability of development outside of the footnote 7 areas.

**3.21** GIS data on listed buildings (a designated heritage asset) and ancient and veteran trees (a designated irreplaceable habitats) are only available as point data. There is no consistent and accurate GIS data available marking the extent of the setting of such assets. In the absence of consistent and readily available area-based data sets for these assets, GIS point data have instead been mapped to draw attention to their location within assessed Green Belt locations, highlighting the need for further detailed work (as appropriate through the plan-making and development management processes) to establish the effects on these assets.

**3.22** Mapped areas at risk of flooding are confined to Flood Zones 2 and 3 on the basis that additional areas of surface water or groundwater flooding outside of these flood zones are not mapped to at a sufficiently granular and consistent scale across the study area to be useful to the definition of grey belt land at a strategic scale. The impact of prospective development sites on additional areas of surface water or groundwater flooding (outside of flood zones 2 and 3) will require consideration in greater detail at a later stage through site allocation and/or development management processes.

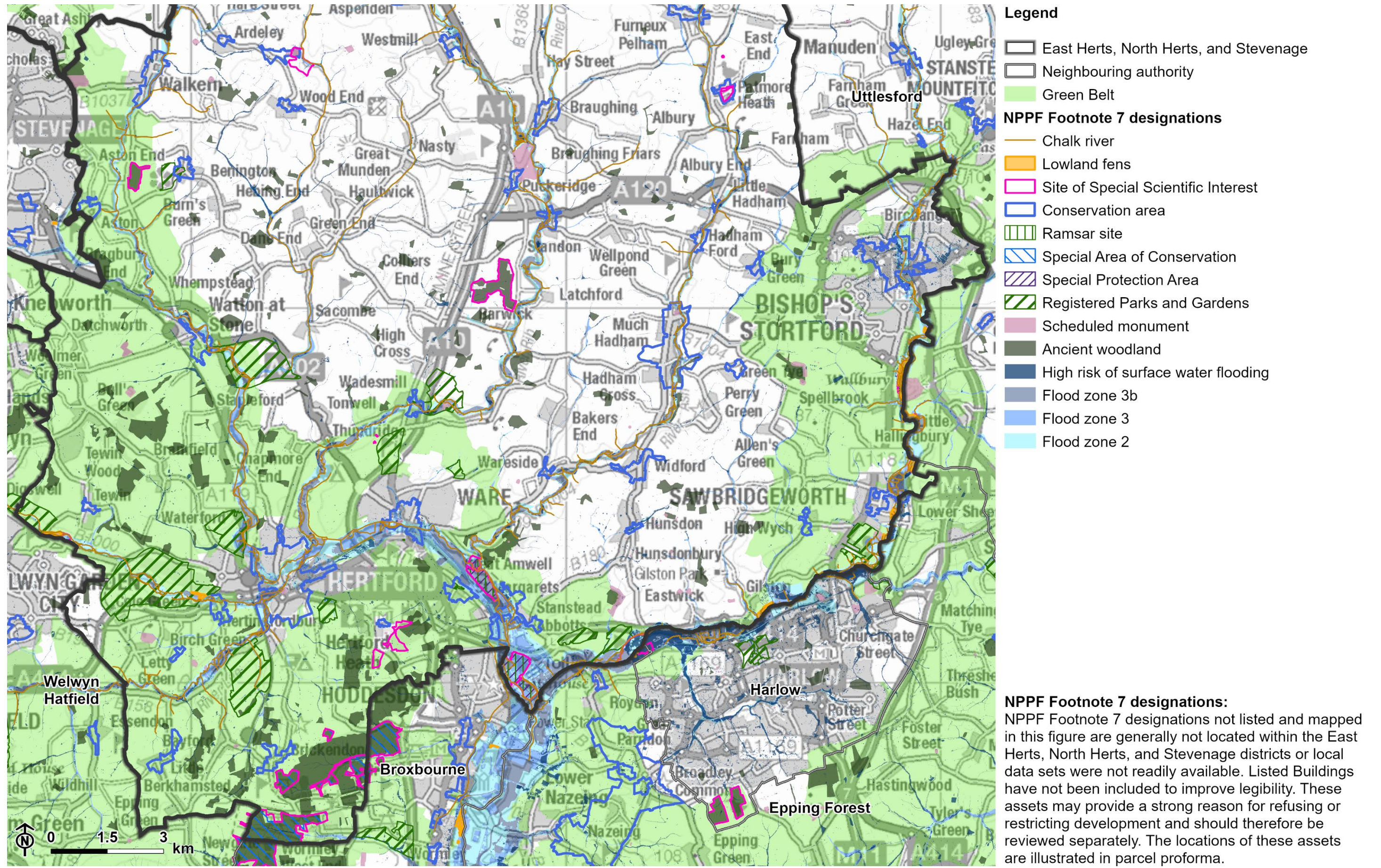
**3.23** The relevant Footnote 7 Areas and Assets are shown on **Figures 3.1** and **3.2**.

Figure 3.1: Designations (north-west)



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Figure 3.2: Designations (south-east)



## Previously developed land

**3.24** The NPPF definition of grey belt indicates that only previously developed land (PDL) that does not make a strong contribution to Green Belt purposes A, B or D can be defined as grey belt land, i.e. that PDL in isolation is insufficient justification to define Green Belt land as grey belt. This is supported by recent appeal decisions directly relevant to the matter [\[See reference 12\]](#).

**3.25** The NPPF glossary defines Previously Developed Land (PDL) as “Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

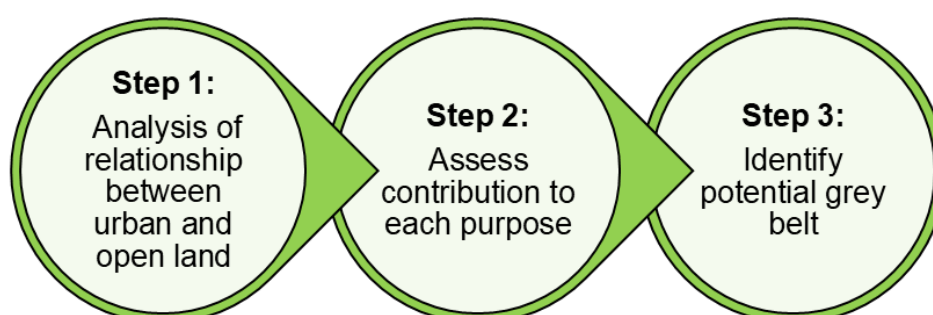
**3.26** This assessment does not expressly identify PDL but the majority of significant activities and land uses that qualify for definition as PDL are typically defined as making less than a strong contribution to Green Belt purposes A, B and D (by virtue of their urbanising influence and/or effect on the openness of the Green Belt) and therefore fall within defined grey belt locations through the assessment process. Some PDL such as large areas of fixed surface infrastructure may in certain locations maintain a strong sense of openness such that they make a strong contribution to Green Belt purposes A, B or D and are not eligible for definition as grey belt land.

**3.27** As noted above, land which is fully developed and less than five hectares in area have not been defined as separate parcels. Areas which are only partially developed, however, and which therefore may have some development potential, have been parcelled down to a minimum of one hectare in area. For smaller areas, more detailed assessment for allocation through the plan-making process and/or development through the planning application process may be required.

## Assessment of Green Belt contribution and definition of grey belt land

A flow diagram illustrating the steps in defining and assessing Green Belt parcels is shown in Figure 3.2.

**Figure 3.2: Stages of the parcel assessment process**



### Step 1: Analysis of relationship between urban and open land

**3.28** Working outwards from inset settlement edges, the analysis process identified variations in the relationship between the urban area and open Green Belt land, marking variations in the relevance of each Green Belt purpose and the strength of Green Belt land's relationship with urban areas and the open countryside. These markings were then used to define parcels and outer areas which each make a consistent level of contribution to the Green Belt purposes.

**3.29** To identify variations in the relationship between urban and open land the analysis considered the role of:

- Boundary features between the urban area and the parcel, giving an indication of their strength. Features such as woodlands, major roads and rivers would typically be considered strong boundary features, and consistency of a distinctive boundary feature over distance also adds to its strength. Where a parcel does not lie directly adjacent to an urban area there may be a number of 'layers' of boundary feature to consider. Hedgerows (unless containing a strong component of mature trees), garden fence-lines or minor roads (unless combined with strong hedgerows) are considered weak boundaries;
- Landform - changes in landform which strengthen the sense of separation from the urban area. A sharp change in slope or crossing of a ridgeline are examples

of changes in landform which would significantly increase sense of separation from an urban area;

- Perception of urban development (influenced by boundaries, landform, the scale and extent of urban development and distance from urban areas);
- Urbanising influences within the Green Belt; the extent of development and/or activity in the Green Belt that would increase urbanising influence. Locations above the minimum parcel size (1ha) which lack openness, and therefore make no contribution to the Green Belt purposes, are noted. These would generally be considered previously developed land (PDL), but there are also areas of land meeting the definition of 'previously developed' that still retain some openness and therefore still perform a role in relation to one or more of the Green Belt purposes. The NPPF's definition of grey belt makes it clear that only PDL that does not make a strong contribution to the Green Belt purposes can be defined as grey belt land;
- Strength of relationship with the wider countryside, with reference to visual connectivity and the role of natural or built features creating containment and limiting this relationship. Where urban development is creating containment, urbanising influence will be stronger than is the case where other physical features, such as tree cover, create containment. It should be noted that not all types of development that are typically considered inappropriate in the Green Belt will be treated as having a significant urbanising impact – roads, for example, are not just a feature of urban areas, and solar arrays are more commonly associated with rural than urban locations, and are considered a temporary form of development.

**3.30** It was assumed, when assessing the contribution of a parcel to the Green Belt purposes, that any future development within that parcel would retain existing outer boundary features (to form the new boundary between urban and open land).

**3.31** The paragraphs below identify the factors relevant to the assessment of each of the Green Belt purposes and detail the assessment outputs specific to each purpose in line with national planning policy, practice guidance and case law.

## Step 2: Assessment of contribution to each purpose

### Purpose A – to check the unrestricted sprawl of large built-up areas

#### Grey belt PPG for Purpose A

**3.32** The following features in combination are identified as being illustrative of a **'strong'** contribution:

- Absence of existing development.
- Adjacent or in close proximity to a large built-up area.
- Lack of physical features in reasonable proximity that could restrict and contain development.
- A location which, if developed, would form an incongruous pattern in relation to large built-up areas.

**3.33** The presence of one or more of the following features, in addition to being near to a large built-up area, is identified as being illustrative of a **'moderate'** contribution to Purpose A:

- Presence of, or containment by, development such that any new development would not result in an incongruous pattern of development.
- Being subject to other urbanising influences.
- Having physical feature(s) in reasonable proximity that could restrict and contain development.

**3.34** Either lack of proximity to a large built-up area or the presence of, or containment by, significant existing development, is identified as being illustrative of a **'weak/no'** contribution to Purpose A.

#### Purpose A definitions

**3.35** The PPG uses several terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

***‘Large built-up area’***

**3.36** The PPG states that ‘villages should not be considered large built-up areas’ (PPG Paragraph: 005 Reference ID: 64-005-20250225). The implication of this is that towns and cities are large built-up areas.

**3.37** For the purposes of this study the definition of large built-up areas has been informed by the settlement hierarchy defined in Policy SP2 of the current North Herts Local Plan, a list of towns in the East Herts Local Plan and analysis of settlements in neighbouring authorities which may be close enough to be relevant to the assessment of land in the study area. All settlements defined as towns have been treated as large built-up areas.

**3.38** In North Herts and Stevenage this includes:

- Baldock
- Hitchin
- Letchworth Garden City
- Royston
- Stevenage (Including Great Ashby).

**3.39** In East Herts this includes:

- Bishop’s Stortford
- Buntingford
- Hertford
- Sawbridgeworth
- Ware
- Gilston\*

(\* with almost 10,000 proposed homes Gilston, although designed as seven separate but nearby villages, will in terms of its overall size be large enough to treat as a town and large built-up area in terms of the Green Belt purposes.)

**3.40** In other local authority areas this includes:

- Welwyn Garden City (in Welwyn Hatfield District)
- Luton (in Luton Borough)
- Harlow (in Harlow District)

- Hoddesdon (in Broxbourne District)
- Harpenden (in St Albans District).

### ***‘Near to’***

**3.41** Purpose A is relevant to land which is ‘adjacent or near to’ a large built-up area. The extent to which land in the vicinity of a large built-up area relates to it is a question of judgement based on a range of factors including:

- Distance proportional to the size and proximity of large built-up areas.
- Features that create a sense of physical and/or visual separation.
- Features that weaken the sense of separation through physical and/or visual connection.
- Urbanising development and activity within the Green Belt.

**3.42** Although villages are not large built-up areas, villages that lack significant separation from, or are relatively close to a large built-up area as a result of one or more of the factors outlined above are considered to be near to a large built-up area.

**3.43** The point beyond which Green Belt land is not considered to be ‘near to’ a large built-up area is where development, whether it be the expansion of existing villages or the creation of new settlements would be sufficiently distinct from the large built-up area as to not be perceived as sprawl associated with it.

### ***‘Free of existing development’***

**3.44** ‘Existing development’ is not considered to include the appropriate development ‘exceptions’ listed in NPPF paragraph 154, such as agricultural buildings, which case law [\[See reference 13\]](#) generally considers does not affect the openness of the Green Belt.

**3.45** “Free of” is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on a case-by-case basis taking into consideration the combination of a particular area’s visual and spatial openness.

**'Physical features in reasonable proximity...that could restrict and contain development'**

**3.46** Many features could be considered to define the edge of a developed area, including features such as built form, roads and walls, created in association with new development. However, the concept of 'restricting' and 'containing' development is considered to relate to the extent to which new development would be prevented from having an urbanising influence on land immediately beyond by intervening physical features. Urbanising influence (defined under the header 'other urbanising influences' directly below) is one of the factors identified in the PPG as being indicative of a 'moderate' contribution to Purpose A. If adjacent land which currently makes a 'strong' contribution to Purpose A would, as a result of increased urbanising influence, make a weaker contribution, such that it became grey belt, then physical features would not be deemed to 'restrict and contain' development.

**3.47** For the purposes of a strategic assessment of existing Green Belt land, this judgement is based on existing physical features in reasonable proximity of existing urban areas, without consideration of potential strengthening of boundaries that could be associated with particular development proposals. Physical features that restrict and contain development would typically be:

- strong natural landscape elements such as woodlands or changes in topography, which limit views or create a stronger sense of separation between urban and open land; or
- natural or manmade features that present a physical barrier to movement, and which have some visual screening role, such as tree-lined rivers or canals, motorways and railway lines with embankments, or main roads with strong boundary vegetation.

**3.48** Such features are not considered to restrict and contain development if they emanate out from a large built-up area.

**3.49** As assessment parcels are defined to reflect variations in contribution to the Green Belt purposes, physical features that restrict and contain development are typically parcel boundaries. The question of the distance within which a physical feature can be considered to limit impact on undeveloped Green Belt land - that is, whether it is 'in reasonable proximity' - is more likely to arise when harm of the release of a specific site is being addressed.

***‘Enclosed by existing development’ (‘partially’ or ‘largely’)***

**3.50** The extent to which land can be considered to be enclosed by development is a judgement which depends both on the strength of the existing development’s urbanising influence on neighbouring Green Belt land and the strength of the neighbouring Green Belt land’s physical and/or visual relationship with the wider countryside. The greater the proportion of a defined Green Belt parcel’s boundary that adjoins urban development (whether that is inset from the Green Belt or washed-over by it) the greater its enclosure. However, strong urban edge boundary features which limit urbanising influence can limit the sense of enclosure or containment by adjoining development, as long as there is some sense of connectivity with the wider countryside. Conversely, a lack of physical and visual connectivity with the wider countryside can increase the sense of enclosure, even if urban development around a Green Belt area is not strongly visible.

***‘Other urbanising influences’***

**3.51** Separate to the consideration of existing development within the Green Belt, ‘other urbanising influences’ could be a land use or activity without built development which is generally associated with urban areas, or it could be an urbanising influence from adjacent development, either inset within the Green Belt or outside but adjacent to Green Belt land.

**3.52** The PPG refers to activity in the Green Belt, such as traffic generation, having an impact on openness. In some cases, there may be land uses which, although appropriate and not therefore affecting openness, still have an association with the urban area that constitutes a degree of urbanising influence. Notable examples could include sport and recreational playing fields or ‘large areas of fixed surface infrastructure such as large areas of hardstanding [that have not blended into the landscape]’, the latter of which is defined in the NPPF as PDL.

**3.53** The urbanising influence of renewable energy and power infrastructure is judged on a case-by-case basis based on their permanence and scale of fixed surface infrastructure, such as large areas of hardstanding, associated with them. For example, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore have not been judged as notable urbanising influences affecting contribution to the Green Belt purposes in perpetuity, whereas permanent substations set on fixed surface infrastructure, do affect the contribution to the Green Belt purposes over the long term.

**3.54** The strength of urbanising influence associated with such areas depends on a number of factors, including the presence or lack of intervening physical boundary features, the scale/visibility of development in the associated urban area, landform change, distance from the existing urban edge and strength of relationship with the wider countryside.

### ***‘An incongruous pattern of development’***

**3.55** The PPG cites an extended “finger” of development into the Green Belt as an example of an incongruous pattern of development. Where parcels are defined to reflect variations in contribution to the Green Belt purposes they are unlikely to be finger-like in form, so this scenario would more typically relate to the assessment of specific development proposals. There may, however, be smaller ‘satellite’ settlements around large built-up areas which lie close enough to them to be at risk of merging were development to occur reducing separation between them. Significant loss of separation in such a gap, could in effect lead to the satellite settlement becoming an ‘extended finger’ of the large built-up area.

**3.56** Any breaching of a significant existing physical feature, or a significant combination of adjacent physical features, that currently serve to restrict and contain the existing large built-up area, would also form an incongruous pattern of development. Examples of this sort of step-change in settlement form would be development crossing a major retaining and containing road, railway or river, or extending out from a valley onto a hilltop into open Green Belt land that does not relate well to existing development.

### **Purpose A outputs**

**3.57** The contribution to Purpose A is determined in line with the illustrative factors listed in the PPG guidance, denoting strong, moderate and weak/no contributions.

**3.58** The supporting analysis of contribution to Purpose A is set out in parcel assessment outputs under five bullet points. These draw on information set out in the ‘description’ section:

- The first bullet point indicates whether the parcel is adjacent or near to a large built-up area, with additional text to note if the parcel is close to a village which is near enough to the large built-up area to contribute to preventing its sprawl (termed a ‘satellite’ settlement).
- The second bullet point indicates whether the parcel is free from development.

- The third bullet point indicates whether the parcel is subject to urbanising influences from outside of the parcel.
- The fourth bullet point notes whether there are physical features which could restrict and contain development.
- The fifth bullet point states whether development in the parcel would have an incongruous impact on the pattern of development.

## Purpose B – to prevent neighbouring towns merging into one another

### Grey belt PPG for Purpose B

**3.59** The following features in combination are identified as being illustrative of a ‘**strong**’ contribution:

- Land forming a substantial part of a gap between towns.
- Absence of existing development.
- Development would result in the loss of visual separation of towns.

**3.60** The presence of one or more of the following features in a gap between towns is identified as being illustrative of a ‘**moderate**’ contribution to Purpose B:

- Land forming a small part of a gap between towns.
- Development would not result in the loss of visual separation of towns, for example due to the close proximity of structures, natural landscape elements or topography that preserve visual separation.

**3.61** Green Belt land that does not have a relationship with a gap between towns or forms only a very small part of a gap between towns, such that it makes no contribution to visual separation, is identified as being illustrative of a ‘**weak/no**’ contribution to Purpose B.

### Purpose B definitions

**3.62** The PPG uses several terms which require further definition to be applied as part of the assessment process for Purpose B. These are addressed in the paragraphs below.

***'Town'***

**3.63** The PPG states that 'this purpose relates to the merging of towns, not villages' (PPG Paragraph: 005 Reference ID: 64-005-20250225). As all towns and cities constitute 'large built-up areas' for Purpose A, the same list of settlements is applicable to Purpose B.

***'A substantial part of a gap'***

**3.64** Whether part of a gap can be described as substantial is a function not just of its relative size to the gap as a whole but also of the physical features in it. Some 'separating' physical features, such as woodlands, landform features, major roads, railways and rivers strengthen perceived separation, particularly where they contribute to visual separation. However it is recognised that roads and railways can also be 'connecting' features that strengthen the link between towns, reducing the time taken to pass through a gap and weakening the role of visual separators. This is considered by the assessment on a locally specific basis.

**3.65** Other areas of built form, such as villages and hamlets, industrial, educational and retail estates, between towns can be physically and visually connecting features. However, if the scale of intervening development and/or the size of gap between the towns means that these towns are not considered 'neighbouring' then Purpose B will be less directly relevant. In these cases, the contribution of open land in gaps between towns and other areas of built form is addressed through Purpose A, which recognises the role of such land in preventing smaller 'satellite' settlements/developments from merging with towns.

**3.66** A parcel contributes more to the 'substance' of a gap between towns if it contains key separating physical features. The more fragile a gap, the more likely that a smaller part of it might be to be considered substantial.

**3.67** The fragility of a gap is a key consideration to establish what is and is not substantial within or adjacent to a gap between neighbouring towns. Gap fragility is judged based on a combination of factors including the relative size of the gap and/or the presence/absence of connecting and separating features:

- A robust gap is typically relatively wide and contain significant physical features that maintain visual separation.
- A moderate gap may be relatively wide but lack significant physical features that maintain visual separation or be relatively narrow but contain physical features that maintain visual separation.

- A fragile gap is typically relatively narrow and lack physical features that maintain visual separation.

**3.68** Green Belt land can play a peripheral role and therefore make a more limited contribution to a gap between towns where it does not lie directly in a gap but its development would weaken Green Belt land in a gap. Green Belt land on the periphery of fragile gaps may still be judged to be a substantial part of it, but otherwise will generally not. Green Belt land within a gap may also to an extent be considered peripheral if the neighbouring towns in question are already to a significant extent connected by development.

**3.69** Development expanding a town out into the core of a gap, removing a relatively large part of it, would clearly represent a substantial impact, but such scenarios would generally be captured as making a 'strong' contribution to Purpose A (and therefore not be eligible for definition as grey belt) as a consequence of a likely resulting incongruous pattern of development. This may be because the functional role of the gap has already been eroded by the partial merging of the towns.

**3.70** Relatively wide gaps between towns generally have scope for some new development within them without significant loss of visual separation between neighbouring towns. Consequently, large parcels or 'outer areas' within or on the periphery of relatively wide gaps that only represent 'a substantial part of a gap' between towns by virtue of their size have generally been rated as making a 'moderate' contribution to Purpose B, in acknowledgement of their potential to accommodate development in smaller parts of them without loss of visual separation of towns. In this way the assessment findings will help point to areas of search where there could be potential (in Green Belt terms) for development, including new settlements, in gaps between neighbouring towns.

### ***A 'small' or 'very small' part of a gap'***

**3.71** 'A small part of a gap' is judged to be an 'insubstantial' part of it – that is, land in a gap that does not meet the 'substantial' definition above – but one which still provides a degree of visual separation.

**3.72** A 'very small' part of gap is an area which does not contribute to visual separation, generally as a result of their existing development and/or containment and significant urbanisation. These areas generally also make a weak/no contribution to Purpose A.

**3.73** It is not appropriate to define fixed or overarching gap widths for the terms 'substantial', 'small' and 'very small'. As with the definition of 'near to' set out above,

this will depend on site-specific factors, including the distance in proportion to the size of towns, the degree of visual separation, and the presence of urbanising development or activity within the Green Belt.

### ***‘Loss of visual separation’***

**3.74** ‘Loss’ is interpreted as either complete removal or a ‘significant reduction’ in visual separation, rather than its complete removal. Typically the development of a substantial part of a gap has the potential to equate to a significant loss of visual separation although, as noted in the section above, relatively wide gaps between towns could in some circumstances accommodate a degree of new development, isolated from any town, without a significant loss of visual separation, i.e. no more than a minor reduction in visual separation. Negligible reductions in visual separation are likely to be limited to areas already containing existing development and/or are contained and significantly urbanised by urban influences.

### ***‘Free of existing development’***

**3.75** ‘Existing development’ is not considered to include the appropriate development ‘exceptions’ listed in NPPF paragraph 154, such as agricultural buildings, which case law [\[See reference 14\]](#) generally considers does not affect the openness of the Green Belt. Paragraph 160 of the NPPF states ‘elements of many renewable energy projects will comprise inappropriate development’; however, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore have not been judged as existing development affecting contribution to the Green Belt purposes in perpetuity.

**3.76** ‘Free of’ is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on the basis of a combination of an area’s visual and spatial openness.

## **Purpose B assessment outputs**

**3.77** The contribution of a parcel to Purpose B is determined in line with the illustrative factors listed in the PPG guidance, denoting strong, moderate and weak/no contributions.

**3.78** The supporting analysis of contribution to Purpose B is set out in parcel assessment outputs under three bullet points. These draw on information set out in the ‘description’ section:

- The first bullet point states whether the parcel lies in a gap between neighbouring towns and, if so, gives an indication of the strength of the gap, with reference to distance, separating and connecting features and visual openness. This helps to support judgements as to whether the parcel forms a substantial part of the gap.
- The second bullet point indicates whether the parcel is free from development.
- The third bullet point states whether the parcel forms a substantial, small or very small part of the gap, with reference to separating features that would be lost were development to take place.
- The fourth bullet comments on the extent of loss of visual separation.

### **Purpose C – to protect the countryside from encroachment**

**3.79** Purpose C is not relevant to the identification of grey belt and is not referenced in the PPG, but it is still one of the five purposes of Green Belt set out in the NPPF. Ratings of contribution to Purpose C could still help inform judgements regarding which grey belt areas are more suitable for release than others in Green Belt terms. In addition, if the release and/or development of Green Belt land outside of defined grey belt areas needs to be considered, contribution ratings for Purpose C may be an important consideration. For example, in locations not near to and remote from towns and cities, variations in contribution to Purpose C may provide the only source of comparison in the contribution of Green Belt land to the Green Belt purposes.

#### **Purpose C definitions**

**3.80** Purpose C has been assessed by determining the extent to which a location can be considered part of the countryside, the level of urbanising influence affecting it and whether or not development in the parcel would significantly increase urbanising influence on adjacent open land.

#### ***'Part of the countryside'***

**3.81** Green Belt land is part of the countryside where it is open and has a clear connection with the wider open countryside. Physical isolation from the wider countryside, uses which create a strong association with an urban area, or the presence of existing urban development can affect what is judged to be countryside in Green Belt terms. This is not a judgement which considers the scenic beauty, ecological value or condition of land.

### ***'Urbanising influence'***

**3.82** This is defined as a combination of both the influences of 'existing development' and 'other urbanising influences' (both defined under Purpose A above). This includes urbanising development washed over by, inset within or directly adjacent to the outer edges of the Green Belt, such as villages and hamlets, industrial, educational and/or retail estates.

**3.83** Relevant factors influencing the significance of urbanising influence include separating/screening physical boundary features, the scale/visibility of urbanising development and associated land uses and activity, landform change, distance from the urban areas, and the strength of relationship with the wider countryside.

### **Purpose C assessment outputs**

**3.84** The contribution of a parcel to Purpose C is determined in terms of whether land makes a strong, moderate and weak /no contribution to this Purpose.

**3.85** The following features in combination are identified as being illustrative of a **'strong'** contribution:

- Land is part of the countryside.
- None or no significant urbanising influence with a lack of features to restrict and contain development, such that were development to take place, there would be a stronger urbanising impact on adjacent Green Belt land than is currently the case.

**3.86** The following features in combination are identified as being illustrative of a **'moderate'** contribution:

- Land is part of the countryside.
- Some urbanising influence.
- The presence of features to restrict and contain development, such that were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.

**3.87** The following features in combination are identified as being illustrative of a **'weak/no'** contribution:

- Land is wholly or largely contained from the wider countryside by development, or openness is significantly limited by existing development.
- Significant urbanising influence.

- Were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.

**3.88** The supporting analysis of contribution to Purpose C is set out in parcel assessment outputs under four bullet points. These draw on information set out in the ‘description’ section:

- The first bullet point indicates whether the parcel is perceived as part of the countryside or whether urban containment or development weaken its relationship with the wider countryside.
- The second bullet point indicates whether the parcel is free from development.
- The third bullet point indicates whether the parcel is subject to urbanising influences from outside of the parcel.
- The fourth bullet point states whether development in the parcel would significantly increase urbanising influence on adjacent open land.

## Purpose D – to preserve the setting and special character of historic towns

### Grey belt PPG for Purpose D

**3.89** The following features in combination are identified as being illustrative of a ‘strong’ contribution to Purpose D:

- Absence of existing development.
- Form part of the setting of a historic town.
- Land makes a considerable contribution to a historic town’s special character – being within, adjacent, or of significant visual importance to its historic aspects.

**3.90** The presence of one or more of the following features, in addition to being part of the setting and/or contributing to the special character of a historic town, is identified as being illustrative of a ‘moderate’ contribution to Purpose D:

- Containing existing development.
- Separated from historic aspects of the historic town by existing development or topography.
- No important visual, physical, or experiential relationship to historic aspects of a historic town.

**3.91** Land that does not form part of the setting of a historic town, with no visual, physical, or experiential connection to the historic aspects of a town is illustrative of a **'weak/no'** contribution to Purpose D.

### **Purpose D definitions**

**3.92** The PPG uses several terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

#### ***'Historic town'***

**3.93** The PPG is clear that this purpose relates to historic towns, not villages (PPG Paragraph: 005 Reference ID: 64-005-20250225). An extract from Hansard in 1988 clarified which historic settlements in England were certainly considered 'historic towns' in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge [See reference 15]. Durham has since been added to this list.

**3.94** It has been LUC's experience through consultation with Historic England on several Green Belt study method statements, that Historic England do not consider the list on towns quoted in Parliament to necessarily be exclusive. Therefore, the settlements referenced under the definitions of 'large built-up area' (see section titled Purpose A definitions) and 'town' (see section titled Purpose B definitions) above all have the potential to be defined as 'historic towns' relevant to the assessment of Purpose D, subject to the definition of their historic settings or special character.

**3.95** Clearly there are historic aspects to towns and smaller settlements within the study area, but the important aspect in terms of contribution to this purpose is that there needs to be a significant relationship between Green Belt land and historic aspects of a settlement's setting, such that some degree of special character results. Many towns have designated conservation areas, but these are commonly focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than key to special character.

**3.96** Green Belt land in the study area is considered to have potential to contribute to the special character of the following towns:

- Baldock
- Letchworth

- Hitchin
- Welwyn Garden City
- Hatfield
- Hertford
- Bishop's Stortford
- Sawbridgeworth
- Ware.

### ***'Setting and special character'***

**3.97** The extent to which the Green Belt contributes to the setting and special character of a historic town is related to the visual, physical and/or experiential relationship between Green Belt land and historic aspects of a town.

**3.98** What forms part of a historic town's setting and contributes to the setting and/or special character of a historic town is a matter of professional judgement that cannot be defined in general terms. It is unique to each historic town's character, townscape and connections to the wider landscape.

**3.99** The connection between a historic town's historic character and the wider countryside does not have to be physical; indeed, successive waves of development often isolate core historic areas from the surrounding countryside, meaning it is often more a visual connection. This visual connection can be determined by consideration of movement through the area, or views into or out of the settlement.

**3.100** The assessment considers whether any Green Belt land contributes to the special character of any of the towns listed above and, if so, to what extent.

### ***'Historic aspects'***

**3.101** In order to establish the relevance of Green Belt land to historic aspects of a historic town it is necessary to review and research each historic town's historic aspects in turn. This has been carried out with reference to historic environment evidence for each historic town, such as historic town setting studies and conservation area appraisals.

**3.102** Recorded references to the open countryside or key physical features and/or landmarks in the Green Belt are useful in judging and justifying the appropriate level

of contribution relevant Green Belt land makes to a historic town's setting and special character.

**3.103** Some historic towns have historic aspects that have little to no relationship with their setting and special character, and some historic towns contain historic areas focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than part of the historic town's setting and special character. Where this is the case, contribution to Purpose D can often be ruled out, noting that this does not mean such places do not have special and unique characteristics worthy of preservation, just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D.

### ***'Free of existing development'***

**3.104** 'Free of existing development' is defined under Purpose A and B above. The same definition applies to Purpose D.

### **Purpose D outputs**

**3.105** The contribution of a parcel to Purpose D is determined in line with the illustrative factors listed in the PPG guidance, denoting strong, moderate and weak/no contributions.

**3.106** The supporting analysis of contribution to Purpose D is set out in parcel assessment outputs under three bullet points. These in part draw on information set out in the 'description' section:

- The first bullet point states whether the parcel forms part of the setting of a historic town.
- The second bullet point indicates whether the parcel is free from development.
- The third bullet point indicates whether the parcel makes a considerable contribution to special character, some contribution or little/no contribution to the setting and/or special character or a historic town, with supporting text to justify this judgement.

### **Purpose E – to assist in urban regeneration**

**3.107** Purpose E is not relevant to the identification of grey belt and is not referenced in the PPG, but it is one of the five purposes of Green Belt set out in the NPPF.

**3.108** Most Green Belt studies do not assess individual Green Belt land parcels against Purpose E, and either do not rate them or rate them all equally, on the grounds that outside the definition of PDL, it is difficult to justify why the release and/or development of one area of Green Belt land has a greater impact on encouraging re-use of urban land than another. This is supported by planning inspectors' judgements on the matter, such as the inspector's report regarding: the London Borough of Redbridge's Local Plan (January 2018), which noted that with regards to Purpose E 'this purpose applies to most land' but that 'it does not form a particularly useful means of evaluating sites' [\[See reference 16\]](#).

**3.109** More generally regarding plan-making, paragraph 147 of the NPPF states that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development .....[including] a) makes as much use as possible of suitable brownfield sites and underutilised land and b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport'. In other words, Purpose E must have already been followed before options in the Green Belt are considered further.

**3.110** Using evidence to inform meaningful judgements on the collective contribution Green Belt land makes to Purpose E is also difficult. In the absence of any clear guidance on what percentage of recorded brownfield land enables a Green Belt to play a stronger or more limited role in encouraging urban regeneration, a uniform level of 'moderate' contribution to Purpose E is applied to all areas of Green Belt in the study area.

### Step 3: Identification of potential grey belt

**3.111** Having assessed the strength of contribution to Green Belt purposes A, B and D, areas of potential grey belt have been defined, and are illustrated on maps for land surrounding each settlement and for the study area as a whole.

**3.112** PPG Paragraph: 006 Reference ID: 64-006-20250225 clarifies that grey belt, 'excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF would provide a strong reason for refusing or restricting development. It highlights that in such locations grey belt can only be identified provisionally before consideration is informed by specific proposals which provide appropriate detail. Mapping therefore also shows footnote 7 areas, as Green Belt land which coincides with footnote 7 areas or assets which can therefore only provisionally be considered grey belt. Land outside of footnote 7 areas could also

require more detailed consideration of the potential impact that proposed or envisaged development might have on policies applicable to the footnote 7 areas.

**3.113** Critically, even where Green Belt land is identified as grey belt there, if proposed or envisaged for development there remains the need to consider such factors as whether:

- Its release and such development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan (as set out below);
- There is a demonstrable unmet need for the type of development proposed;
- The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.

## Fundamental impact to remaining Green Belt land

**3.114** Green Belt assessments must also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole. The PPG states that this judgement should focus on evaluating the effect of release or development on ‘the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way’.

**3.115** What is fundamental and meaningful could vary significantly based on the scale and nature of the plan area and the range, significance and extent of contribution Green Belt land makes to the Green Belt purposes within it.

**3.116** The PPG uses a few terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

### ‘Plan area’

**3.117** The plan area is the area covered by each of East Herts District, North Herts and Stevenage Borough Councils’ Local Plans.

## ‘Purposes (taken together)’

**3.118** Most Green Belt land does not contribute to all Green Belt purposes to the same degree, with large areas of Green Belt land not contributing or contributing weakly to multiple purposes. Consequently, what constitutes a fundamental and meaningful impact will vary from one local authority area to another depending on which purposes are important in the area. Release or development that fundamentally and meaningfully impacts Green Belt land contributing to one Green Belt purpose would in effect affect its ability to serve the purposes (taken together) in a meaningful way.

## ‘Fundamental’ and ‘meaningful’

**3.119** Some proposals may only fundamentally undermine the ability of the remaining Green Belt land in the plan area to serve a single important purpose to have a meaningful impact. Other proposals may undermine multiple purposes to a degree that in combination their impact is meaningful.

**3.120** The scale and contiguity of Green Belt land within a plan area may also play a role in what is meaningful. Release or development of smaller areas of Green Belt land are likely to be more meaningful in a plan area with smaller areas of Green Belt land. Release or development of pockets of Green Belt land that are isolated from the wider designation within urban areas are less likely to have a meaningful impact.

**3.121** A fundamental and meaningful impact on Purpose A (to check the unrestricted sprawl of large built-up areas) may include, but is not limited to, where release or development of land would result in the physical or perceived merging of a large built-up area with an adjacent satellite settlement such that the adjacent settlement would be perceived to be part of a larger ‘sprawling’ large built-up area. How fundamental and meaningful the loss of such a gap would be dependent on its current contribution to Purpose A. Most sprawl of a large built-up area will not fundamentally undermine the ability of remaining Green Belt land to continue to fulfil this function.

**3.122** A fundamental and meaningful impact on Purpose B (to prevent neighbouring towns from merging into one another) includes but is not limited to release or development that would result in the physical or perceived merging of two currently distinctly separate neighbouring towns, or where release or development would result in the loss of the most substantial part of a gap separating neighbouring towns such that it no longer played a meaningful role in relation to Purpose B. Whether the merging of two neighbouring towns is meaningful may also be influenced by the number of neighbouring towns that could remain distinctly separate by remaining Green Belt land.

**3.123** A fundamental and meaningful impact on Purpose C (to assist in safeguarding the countryside from encroachment) may include but is not limited to where release or development would sever and isolate an area of Green Belt land contributing strongly to Green Belt Purpose C from the wider designation. The vast majority of Green Belt land has at least some countryside function. The release or development of the vast majority of Green Belt land would likely not fundamentally and meaningfully influence the function of adjacent Green Belt land such that it would cease to be considered countryside.

**3.124** A fundamental and meaningful impact on Purpose D (to preserve the setting and special character of historic towns) may include but is not limited to the release or development of an important or very important part of the setting of a historic town, integral to its special character.

**3.125** A fundamental and meaningful impact on Purpose E (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) is not considered likely given that other Green Belt policy prioritises the use of non-Green Belt locations first followed by previously developed land in the Green Belt, i.e. it is unlikely that Green Belt release or development could be justified having not already demonstrated that this purpose has not been fundamentally and meaningfully undermined.

## Fundamental impact outputs

**3.126** Without a clear understanding of the location of release or development, its scale and land use, including what Green Belt land would remain within a plan area, it is not possible to make a definitive judgement on fundamental impact. In the absence of specific proposals, the variations in contribution to each Green Belt purpose identified in this assessment highlight the areas where Green Belt contribution is at its greatest within East Herts District, North Herts and Stevenage Borough Councils. These areas of highest contribution have been reviewed in the round to judge where release or development could fundamentally and meaningfully undermine the purposes in the Plan area. These judgements have been justified.

**3.127** When each Council is in a position to evaluate specific proposals for Green Belt release or development, it will be possible to make a definitive judgement as to whether they would (individually or cumulatively) fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole.

# Chapter 4

## Summary of Findings

### Summary Table and Overview Maps

**4.1 Table 4.1** below lists the ratings, by settlement area, for each parcel.

**4.2 Figures 4.1 to 4.12** are overview maps for the East Herts, North Herts and Stevenage study area as a whole, split into north-west and south-east. The maps show:

- Contribution to Purpose A – to check the unrestricted sprawl of large built-up areas (**Figures 4.1 and 4.2**)
- Contribution to Purpose B - to prevent neighbouring towns merging into one another (**Figures 4.3 and 4.4**)
- Contribution to Purpose C - to assist in safeguarding the countryside from encroachment - (**Figures 4.5 and 4.6**)
- Contribution to Purpose D - to preserve the setting and special character of historic towns (**Figures 4.7 and 4.8**)
- The highest contribution rating for purposes A, B and D (**Figures 4.9 and 4.10**)
- Areas that do not make a Strong contribution to Purposes A, B and D, and so are suitable for definition as grey belt (**Figures 4.11 and 4.12**), subject to confirmation that footnote 7 areas and assets do not provide justification for significantly restricting development. The figures also map the extent of footnote 7 areas and assets.

**4.3 Purpose E** - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land - has not been assessed on a parcel-by-parcel basis. As noted in the Assessment Methodology chapter above, in the absence of any clear guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or more limited, role in encouraging urban regeneration, and the fact that Purpose E must have already been followed before options in the Green Belt are considered further, a uniform level of 'Equal' contribution to Purpose E has been applied to all Green Belt land in the East Herts, North Herts and Stevenage study area.

**Note: Detail ratings for North Herts omitted from below table 4.1**

Table 4.1: Summary of assessment findings

Settlement	Parcel	Local Authority	Area (ha)	Purpose A contribution rating	Purpose B contribution rating	Purpose C contribution rating	Purpose D contribution rating	Grey belt?
Bishop's Stortford North East	BSNE1	East Hertfordshire	7.05	Weak/No	Weak/No	Weak/No	Strong	No
Bishop's Stortford North East	BSNE2	East Hertfordshire	9.50	Strong	Weak/No	Moderate	Strong	No
Bishop's Stortford North East	BSNE3	East Hertfordshire	3.93	Moderate	Weak/No	Weak/No	Weak/No	Yes
Bishop's Stortford North East	BSNE4	East Hertfordshire	14.06	Moderate	Weak/No	Moderate	Moderate	Yes
Bishop's Stortford North East	BSNE5	East Hertfordshire	28.29	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford North East	BSNE6	East Hertfordshire	60.88	Strong	Strong	Strong	Weak/No	No
Bishop's Stortford North East	BSNE7	East Hertfordshire	7.13	Strong	Moderate	Strong	Weak/No	No
Bishop's Stortford North East	BSNE8	East Hertfordshire	3.13	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford North East	BSNE9	East Hertfordshire	4.23	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford North East	BSNE10	East Hertfordshire	13.88	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford North East	BSNE11	East Hertfordshire	35.57	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford North West	BSNW1	East Hertfordshire	19.92	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford North West	BSNW2	East Hertfordshire	13.06	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford North West	BSNW3	East Hertfordshire	13.39	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford North West	BSNW4	East Hertfordshire	59.53	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford North West	BSNW5	East Hertfordshire	37.28	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford South	BSS1	East Hertfordshire	4.08	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford South	BSS2	East Hertfordshire	30.68	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford South	BSS3	East Hertfordshire	5.16	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford South	BSS4	East Hertfordshire	2.09	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford South	BSS5	East Hertfordshire	5.89	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford South	BSS6	East Hertfordshire	32.99	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford South	BSS7	East Hertfordshire	12.69	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford South	BSS8	East Hertfordshire	17.14	Strong	Strong	Strong	Weak/No	No
Bishop's Stortford South	BSS9	East Hertfordshire	39.23	Moderate	Weak/No	Weak/No	Weak/No	Yes
Bishop's Stortford South	BSS10	East Hertfordshire	173.74	Strong	Strong	Strong	Weak/No	No
Bishop's Stortford South	BSS11	East Hertfordshire	1.68	Weak/No	Weak/No	Weak/No	Weak/No	Yes
Bishop's Stortford South	BSS12	East Hertfordshire	1.65	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford South	BSS13	East Hertfordshire	31.77	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford South	BSS14	East Hertfordshire	5.40	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford South	BSS15	East Hertfordshire	37.54	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford South	BSS16	East Hertfordshire	157.04	Strong	Strong	Strong	Weak/No	No
Bishop's Stortford South	BSS17	East Hertfordshire	293.08	Strong	Moderate	Strong	Weak/No	No
Bishop's Stortford West	BSW1	East Hertfordshire	10.02	Moderate	Weak/No	Weak/No	Weak/No	Yes
Bishop's Stortford West	BSW2	East Hertfordshire	3.80	Weak/No	Weak/No	Weak/No	Weak/No	Yes
Bishop's Stortford West	BSW3	East Hertfordshire	12.33	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford West	BSW4	East Hertfordshire	11.91	Weak/No	Weak/No	Weak/No	Weak/No	Yes
Bishop's Stortford West	BSW5	East Hertfordshire	43.93	Moderate	Weak/No	Moderate	Weak/No	Yes
Bishop's Stortford West	BSW6	East Hertfordshire	4.86	Weak/No	Weak/No	Weak/No	Weak/No	Yes
Bishop's Stortford West	BSW7	East Hertfordshire	3.38	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford West	BSW8	East Hertfordshire	3.25	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford West	BSW9	East Hertfordshire	109.99	Strong	Weak/No	Strong	Weak/No	No
Bishop's Stortford West	BSW10	East Hertfordshire	311.96	Strong	Weak/No	Strong	Weak/No	No
Datchworth	DT1	East Hertfordshire	39.97	Weak/No	Weak/No	Weak/No	Weak/No	Yes

Settlement	Parcel	Local Authority	Area (ha)	Purpose A contribution rating	Purpose B contribution rating	Purpose C contribution rating	Purpose D contribution rating	Grey belt?
Datchworth	DT2	East Hertfordshire	15.46	Weak/No	Weak/No	Strong	Weak/No	Yes
Datchworth	DT3	East Hertfordshire	38.76	Weak/No	Moderate	Strong	Weak/No	Yes
Datchworth	DT4	East Hertfordshire	16.98	Strong	Moderate	Strong	Weak/No	No
Datchworth	DT5	East Hertfordshire	11.06	Strong	Weak/No	Strong	Weak/No	No
Datchworth	DT6	East Hertfordshire	21.01	Weak/No	Weak/No	Strong	Weak/No	Yes
Datchworth	DT7	East Hertfordshire	32.43	Weak/No	Moderate	Strong	Weak/No	Yes
Datchworth	DT8	East Hertfordshire	3.83	Weak/No	Weak/No	Moderate	Weak/No	Yes
Datchworth	DT9	East Hertfordshire	40.18	Weak/No	Moderate	Strong	Weak/No	Yes
Datchworth	DT10	East Hertfordshire	129.61	Weak/No	Weak/No	Moderate	Weak/No	Yes
Datchworth	DT11	East Hertfordshire	25.14	Weak/No	Weak/No	Strong	Weak/No	Yes
Datchworth	DT12	East Hertfordshire	44.07	Weak/No	Moderate	Strong	Weak/No	Yes
Datchworth	DT13	East Hertfordshire	23.77	Weak/No	Weak/No	Strong	Weak/No	Yes
Datchworth	DT14	East Hertfordshire	31.23	Weak/No	Weak/No	Strong	Weak/No	Yes
Harlow	HA1	East Hertfordshire	123.85	Strong	Moderate	Strong	Weak/No	No
Harlow	HA2	East Hertfordshire	16.70	Moderate	Weak/No	Moderate	Weak/No	Yes
Harlow	HA3	East Hertfordshire	7.45	Strong	Strong	Moderate	Weak/No	No
Harlow	HA4	East Hertfordshire	95.40	Strong	Strong	Strong	Weak/No	No
Harlow	HA5	East Hertfordshire	11.41	Strong	Weak/No	Strong	Weak/No	No
Harlow	HA6	East Hertfordshire	379.85	Strong	Strong	Strong	Weak/No	No
Hertford South	HF1	East Hertfordshire	123.97	Strong	Strong	Strong	Weak/No	No
Hertford South	HF2	East Hertfordshire	10.48	Strong	Moderate	Strong	Weak/No	No
Hertford South	HF3	East Hertfordshire	38.93	Strong	Moderate	Strong	Weak/No	No
Hertford South	HF4	East Hertfordshire	13.90	Strong	Moderate	Strong	Weak/No	No
Hertford South	HF5	East Hertfordshire	7.36	Strong	Weak/No	Strong	Moderate	No
Hertford South	HF6	East Hertfordshire	5.75	Strong	Weak/No	Moderate	Strong	No
Hertford South	HF7	East Hertfordshire	1.75	Moderate	Weak/No	Moderate	Strong	No
Hertford South	HF8	East Hertfordshire	13.73	Strong	Weak/No	Strong	Strong	No
Hertford South	HF9	East Hertfordshire	3.04	Weak/No	Weak/No	Weak/No	Weak/No	Yes
Hertford South	HF10	East Hertfordshire	17.49	Strong	Weak/No	Strong	Moderate	No
Hertford South	HF11	East Hertfordshire	49.89	Strong	Moderate	Strong	Moderate	No
Hertford South	HF12	East Hertfordshire	15.83	Strong	Weak/No	Strong	Moderate	No
Hertford South	HF13	East Hertfordshire	13.51	Strong	Weak/No	Strong	Weak/No	No
Hertford South	HF14	East Hertfordshire	26.42	Strong	Weak/No	Strong	Moderate	No
Hertford South	HF15	East Hertfordshire	254.57	Strong	Weak/No	Strong	Weak/No	No
Hertford South	HF16	East Hertfordshire	2212.35	Weak/No	Weak/No	Strong	Weak/No	Yes
Hertford South	HF17	East Hertfordshire	108.46	Strong	Weak/No	Strong	Weak/No	No
Hertford North	HFN1	East Hertfordshire	8.05	Strong	Weak/No	Strong	Weak/No	No
Hertford North	HFN2	East Hertfordshire	2.72	Moderate	Weak/No	Moderate	Weak/No	Yes
Hertford North	HFN3	East Hertfordshire	52.52	Strong	Moderate	Strong	Weak/No	No
Hertford North	HFN4	East Hertfordshire	415.45	Strong	Moderate	Strong	Weak/No	No
Hertford North	HFN5	East Hertfordshire	8.20	Weak/No	Weak/No	Weak/No	Moderate	Yes
Hertford North	HFN6	East Hertfordshire	33.65	Moderate	Weak/No	Moderate	Strong	No
Hertford North	HFN7	East Hertfordshire	91.52	Strong	Weak/No	Strong	Moderate	No
Hertford North	HFN8	East Hertfordshire	2.62	Moderate	Weak/No	Moderate	Moderate	Yes
Hertford North	HFN9	East Hertfordshire	105.15	Strong	Weak/No	Strong	Moderate	No
Hertford North	HFN10	East Hertfordshire	21.57	Moderate	Weak/No	Moderate	Weak/No	Yes
Hertford North	HFN11	East Hertfordshire	38.55	Strong	Moderate	Strong	Moderate	No
Hertford North	HFN12	East Hertfordshire	49.39	Strong	Weak/No	Strong	Weak/No	No

Settlement	Parcel	Local Authority	Area (ha)	Purpose A contribution rating	Purpose B contribution rating	Purpose C contribution rating	Purpose D contribution rating	Grey belt?
Hertford North	HFN13	East Hertfordshire	21.12	Strong	Moderate	Strong	Moderate	No
Hertford North	HFN14	East Hertfordshire	143.39	Strong	Strong	Strong	Moderate	No
Hertford North	HFN15	East Hertfordshire	9.48	Strong	Moderate	Strong	Strong	No
Hertford North	HFN16	East Hertfordshire	11.99	Moderate	Weak/No	Moderate	Strong	No
Hertford North	HFN17	East Hertfordshire	12.75	Moderate	Weak/No	Moderate	Strong	No
Hertford North	HFN18	East Hertfordshire	5.11	Moderate	Weak/No	Moderate	Strong	No
Hertford North	HFN19	East Hertfordshire	31.93	Strong	Strong	Strong	Moderate	No
Hertford North	HFN20	East Hertfordshire	21.95	Strong	Strong	Strong	Moderate	No
Hertford North	HFN21	East Hertfordshire	6.96	Weak/No	Weak/No	Weak/No	Moderate	Yes
Hertford North	HFN22	East Hertfordshire	11.54	Moderate	Strong	Moderate	Moderate	No
Hertford North	HFN23	East Hertfordshire	1160.22	Weak/No	Moderate	Strong	Weak/No	Yes
Hertford North	HFN24	East Hertfordshire	536.94	Weak/No	Weak/No	Strong	Weak/No	Yes
Hertford West	HFW1	East Hertfordshire	9.60	Moderate	Weak/No	Moderate	Strong	No
Hertford West	HFW2	East Hertfordshire	5.13	Moderate	Weak/No	Moderate	Strong	No
Hertford West	HFW3	East Hertfordshire	12.10	Strong	Weak/No	Strong	Strong	No
Hertford West	HFW4	East Hertfordshire	18.52	Strong	Weak/No	Strong	Moderate	No
Hertford West	HFW5	East Hertfordshire	46.18	Strong	Weak/No	Strong	Weak/No	No
Hertford West	HFW6	East Hertfordshire	3.08	Strong	Weak/No	Strong	Weak/No	No
Hertford West	HFW7	East Hertfordshire	14.35	Moderate	Weak/No	Moderate	Weak/No	Yes
Hertford West	HFW8	East Hertfordshire	36.16	Strong	Moderate	Strong	Weak/No	No
Hertford West	HFW9	East Hertfordshire	722.74	Strong	Moderate	Strong	Moderate	No
Hertford West	HFW10	East Hertfordshire	14.02	Weak/No	Weak/No	Moderate	Weak/No	Yes
Hertford West	HFW11	East Hertfordshire	19.13	Moderate	Weak/No	Moderate	Weak/No	Yes
Hertford West	HFW12	East Hertfordshire	47.90	Strong	Moderate	Strong	Weak/No	No
Hertford West	HFW13	East Hertfordshire	390.40	Strong	Moderate	Strong	Weak/No	No
Hertford West	HFW14	East Hertfordshire	12.70	Moderate	Weak/No	Moderate	Weak/No	Yes
Hertford West	HFW15	East Hertfordshire	32.10	Strong	Moderate	Strong	Weak/No	No
Hertford West	HFW16	East Hertfordshire	38.85	Strong	Weak/No	Strong	Strong	No
Hertford Heath	HH1	East Hertfordshire	19.83	Strong	Moderate	Strong	Weak/No	No
Hertford Heath	HH2	East Hertfordshire	4.68	Moderate	Weak/No	Strong	Weak/No	Yes
Hertford Heath	HH3	East Hertfordshire	145.82	Strong	Strong	Strong	Weak/No	No
Hertford Heath	HH4	East Hertfordshire	23.20	Strong	Strong	Strong	Weak/No	No
Hertford Heath	HH5	East Hertfordshire	40.86	Strong	Strong	Strong	Weak/No	No
Hertford Heath	HH6	East Hertfordshire	36.71	Strong	Strong	Strong	Weak/No	No
Hertford Heath	HH7	East Hertfordshire	8.08	Strong	Strong	Strong	Weak/No	No
Hertford Heath	HH8	East Hertfordshire	13.80	Strong	Strong	Strong	Weak/No	No
Hertford Heath	HH9	East Hertfordshire	31.46	Strong	Moderate	Strong	Weak/No	No
Hertford Heath	HH10	East Hertfordshire	50.47	Strong	Moderate	Strong	Weak/No	No
Hertford Heath	HH11	East Hertfordshire	44.76	Strong	Moderate	Strong	Weak/No	No
Hertford Heath	HH12	East Hertfordshire	98.92	Strong	Strong	Strong	Weak/No	No
Hoddesdon	HO1	East Hertfordshire	17.04	Moderate	Weak/No	Moderate	Weak/No	Yes
Hoddesdon	HO2	East Hertfordshire	3.19	Moderate	Moderate	Moderate	Weak/No	Yes
Hoddesdon	HO3	East Hertfordshire	37.43	Strong	Strong	Strong	Weak/No	No
Hoddesdon	HO4	East Hertfordshire	38.62	Strong	Strong	Strong	Weak/No	No
Hoddesdon	HO5	East Hertfordshire	11.34	Strong	Moderate	Strong	Weak/No	No
Hoddesdon	HO6	East Hertfordshire	64.38	Strong	Moderate	Strong	Weak/No	No
Hoddesdon	HO7	East Hertfordshire	10.80	Weak/No	Weak/No	Weak/No	Weak/No	Yes
Hoddesdon	HO8	East Hertfordshire	114.21	Strong	Moderate	Strong	Weak/No	No

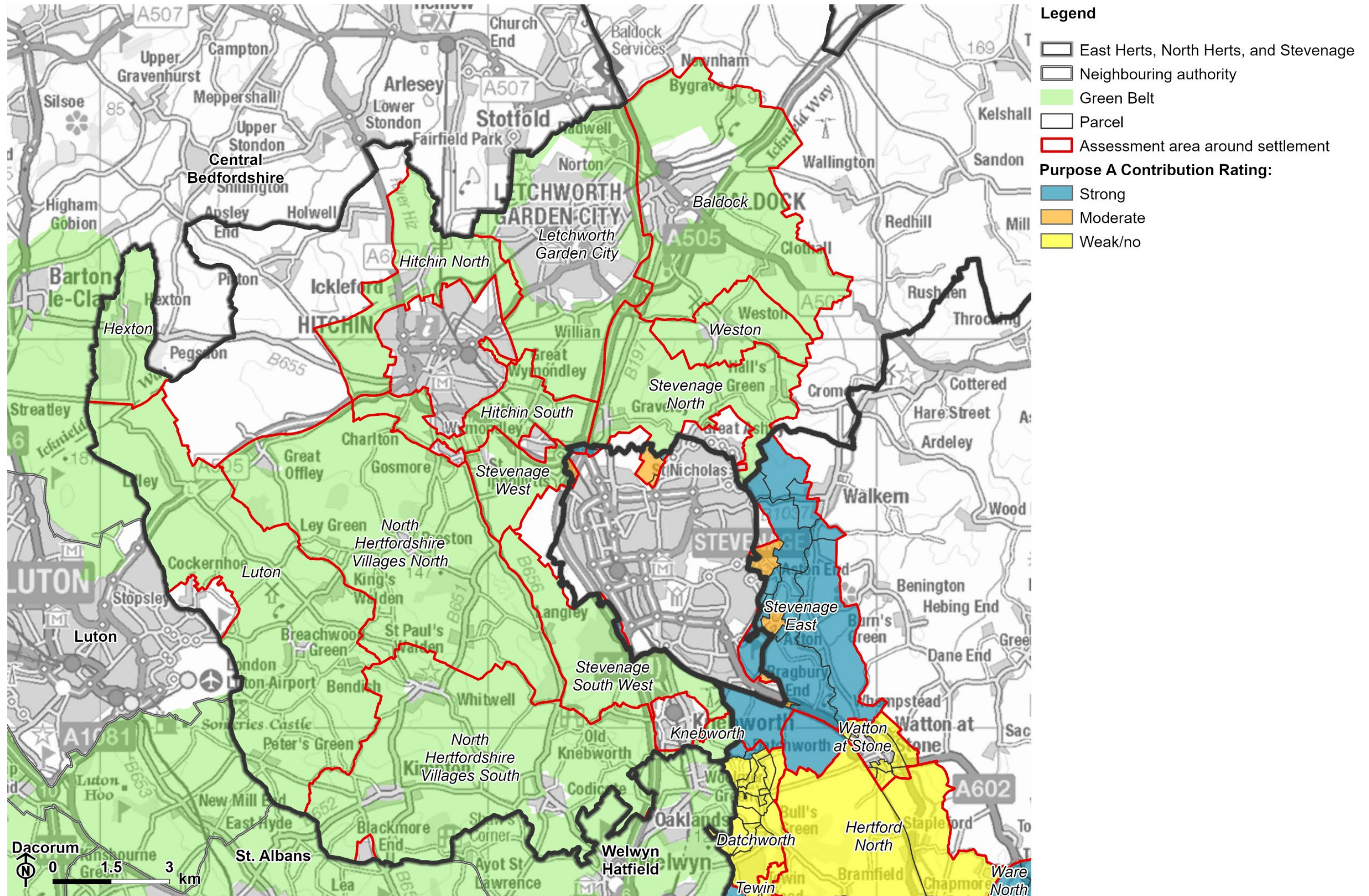
Settlement	Parcel	Local Authority	Area (ha)	Purpose A contribution rating	Purpose B contribution rating	Purpose C contribution rating	Purpose D contribution rating	Grey belt?
Sawbridgeworth North	SB1	East Hertfordshire	22.89	Moderate	Weak/No	Strong	Weak/No	Yes
Sawbridgeworth North	SB2	East Hertfordshire	6.13	Moderate	Weak/No	Moderate	Weak/No	Yes
Sawbridgeworth North	SB3	East Hertfordshire	19.58	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth North	SB4	East Hertfordshire	24.83	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth North	SB5	East Hertfordshire	38.40	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth North	SB6	East Hertfordshire	7.15	Weak/No	Weak/No	Weak/No	Weak/No	Yes
Sawbridgeworth North	SB7	East Hertfordshire	1.71	Moderate	Weak/No	Strong	Weak/No	Yes
Sawbridgeworth North	SB8	East Hertfordshire	7.13	Moderate	Weak/No	Moderate	Weak/No	Yes
Sawbridgeworth North	SB9	East Hertfordshire	2.29	Moderate	Weak/No	Strong	Weak/No	Yes
Sawbridgeworth North	SB10	East Hertfordshire	21.99	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth North	SB11	East Hertfordshire	59.20	Strong	Strong	Strong	Weak/No	No
Sawbridgeworth North	SB12	East Hertfordshire	34.94	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth North	SB13	East Hertfordshire	209.84	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth North	SB14	East Hertfordshire	210.35	Strong	Strong	Strong	Weak/No	No
Sawbridgeworth North	SB15	East Hertfordshire	150.25	Strong	Strong	Strong	Weak/No	No
Sawbridgeworth North	SB16	East Hertfordshire	4.39	Strong	Moderate	Strong	Weak/No	No
Sawbridgeworth North	SB17	East Hertfordshire	12.23	Strong	Strong	Strong	Weak/No	No
Sawbridgeworth North	SB18	East Hertfordshire	20.78	Strong	Strong	Strong	Weak/No	No
Sawbridgeworth North	SB19	East Hertfordshire	18.86	Strong	Weak/No	Strong	Moderate	No
Sawbridgeworth North	SB20	East Hertfordshire	37.23	Strong	Weak/No	Strong	Strong	No
Sawbridgeworth North	SB21	East Hertfordshire	11.88	Moderate	Weak/No	Moderate	Weak/No	Yes
Sawbridgeworth North	SB22	East Hertfordshire	25.21	Strong	Weak/No	Strong	Strong	No
Sawbridgeworth North	SB23	East Hertfordshire	2.13	Moderate	Weak/No	Weak/No	Weak/No	Yes
Sawbridgeworth North	SB24	East Hertfordshire	6.01	Strong	Weak/No	Moderate	Weak/No	No
Sawbridgeworth North	SB25	East Hertfordshire	4.04	Weak/No	Weak/No	Weak/No	Weak/No	Yes
Sawbridgeworth South	SBS1	East Hertfordshire	8.86	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth South	SBS2	East Hertfordshire	33.68	Strong	Weak/No	Strong	Strong	No
Sawbridgeworth South	SBS3	East Hertfordshire	7.40	Moderate	Weak/No	Moderate	Strong	No
Sawbridgeworth South	SBS4	East Hertfordshire	7.73	Strong	Strong	Strong	Strong	No
Sawbridgeworth South	SBS5	East Hertfordshire	21.54	Strong	Strong	Strong	Weak/No	No
Sawbridgeworth South	SBS6	East Hertfordshire	25.60	Strong	Weak/No	Strong	Strong	No
Sawbridgeworth South	SBS7	East Hertfordshire	25.33	Strong	Strong	Strong	Strong	No
Sawbridgeworth South	SBS8	East Hertfordshire	16.23	Strong	Strong	Strong	Weak/No	No
Sawbridgeworth South	SBS9	East Hertfordshire	3.97	Moderate	Weak/No	Moderate	Weak/No	Yes
Sawbridgeworth South	SBS10	East Hertfordshire	11.63	Weak/No	Weak/No	Weak/No	Weak/No	Yes
Sawbridgeworth South	SBS11	East Hertfordshire	7.72	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth South	SBS12	East Hertfordshire	49.32	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth South	SBS13	East Hertfordshire	6.48	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth South	SBS14	East Hertfordshire	28.90	Strong	Weak/No	Strong	Weak/No	No
Sawbridgeworth South	SBS15	East Hertfordshire	69.42	Strong	Strong	Strong	Weak/No	No
Sawbridgeworth South	SBS16	East Hertfordshire	108.41	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE1	East Hertfordshire	148.80	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE2	East Hertfordshire	30.84	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE3	East Hertfordshire, Stevenage	53.60	Moderate	Weak/No	Moderate	Weak/No	Yes
Stevenage East	SE4	East Hertfordshire	20.77	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE5	East Hertfordshire, Stevenage	5.28	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE6	East Hertfordshire, Stevenage	29.78	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE7	East Hertfordshire	30.80	Moderate	Weak/No	Weak/No	Weak/No	Yes

Settlement	Parcel	Local Authority	Area (ha)	Purpose A contribution rating	Purpose B contribution rating	Purpose C contribution rating	Purpose D contribution rating	Grey belt?
Stevenage East	SE8	East Hertfordshire	9.77	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE9	East Hertfordshire	75.41	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE10	Stevenage	64.03	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE11	Stevenage	8.26	Moderate	Weak/No	Moderate	Weak/No	Yes
Stevenage East	SE12	East Hertfordshire	274.37	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE13	East Hertfordshire, Stevenage	4.08	Moderate	Weak/No	Moderate	Weak/No	Yes
Stevenage East	SE14	East Hertfordshire	505.66	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE15	East Hertfordshire, Stevenage	186.22	Strong	Moderate	Strong	Weak/No	No
Stevenage East	SE16	East Hertfordshire	59.67	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE17	East Hertfordshire	123.85	Strong	Weak/No	Strong	Weak/No	No
Stevenage East	SE18	East Hertfordshire	33.12	Strong	Weak/No	Strong	Weak/No	No
St Margarets	SM1	East Hertfordshire	7.33	Moderate	Weak/No	Moderate	Weak/No	Yes
St Margarets	SM2	East Hertfordshire	21.67	Strong	Moderate	Strong	Weak/No	No
St Margarets	SM3	East Hertfordshire	7.54	Strong	Weak/No	Strong	Weak/No	No
St Margarets	SM4	East Hertfordshire	24.70	Strong	Weak/No	Strong	Weak/No	No
St Margarets	SM5	East Hertfordshire	5.95	Strong	Weak/No	Strong	Weak/No	No
St Margarets	SM6	East Hertfordshire	2.13	Moderate	Weak/No	Moderate	Weak/No	Yes
St Margarets	SM7	East Hertfordshire	22.46	Moderate	Weak/No	Moderate	Weak/No	Yes
St Margarets	SM8	East Hertfordshire	35.10	Strong	Moderate	Strong	Weak/No	No
St Margarets	SM9	East Hertfordshire	11.66	Moderate	Weak/No	Moderate	Weak/No	Yes
St Margarets	SM10	East Hertfordshire	13.57	Strong	Strong	Strong	Weak/No	No
St Margarets	SM11	East Hertfordshire	35.94	Strong	Moderate	Moderate	Weak/No	No
St Margarets	SM12	East Hertfordshire	24.71	Strong	Strong	Strong	Weak/No	No
St Margarets	SM13	East Hertfordshire	19.43	Strong	Moderate	Strong	Weak/No	No
Tewin	TW1	East Hertfordshire	78.15	Weak/No	Weak/No	Strong	Weak/No	Yes
Tewin	TW2	East Hertfordshire	4.38	Weak/No	Weak/No	Strong	Weak/No	Yes
Tewin	TW3	East Hertfordshire	20.85	Strong	Weak/No	Strong	Moderate	No
Tewin	TW4	East Hertfordshire	13.78	Weak/No	Weak/No	Strong	Moderate	Yes
Tewin	TW5	East Hertfordshire	2.66	Weak/No	Weak/No	Moderate	Weak/No	Yes
Tewin	TW6	East Hertfordshire	254.98	Strong	Moderate	Strong	Moderate	No
Tewin	TW7	East Hertfordshire	45.28	Weak/No	Moderate	Strong	Weak/No	Yes
Tewin	TW8	East Hertfordshire	14.24	Strong	Weak/No	Strong	Moderate	No
Watton at Stone	WA1	East Hertfordshire	4.62	Weak/No	Weak/No	Moderate	Weak/No	Yes
Watton at Stone	WA2	East Hertfordshire	10.43	Weak/No	Weak/No	Strong	Weak/No	Yes
Watton at Stone	WA3	East Hertfordshire	191.27	Strong	Moderate	Strong	Weak/No	No
Watton at Stone	WA4	East Hertfordshire	53.26	Weak/No	Weak/No	Strong	Weak/No	Yes
Watton at Stone	WA5	East Hertfordshire	54.14	Weak/No	Weak/No	Strong	Weak/No	Yes
Watton at Stone	WA6	East Hertfordshire	10.78	Weak/No	Weak/No	Moderate	Weak/No	Yes
Watton at Stone	WA7	East Hertfordshire	5.04	Weak/No	Weak/No	Moderate	Weak/No	Yes
Watton at Stone	WA8	East Hertfordshire	11.29	Weak/No	Weak/No	Strong	Weak/No	Yes
Watton at Stone	WA9	East Hertfordshire	16.44	Weak/No	Weak/No	Strong	Weak/No	Yes
Ware North	WN1	East Hertfordshire	153.19	Strong	Weak/No	Strong	Weak/No	No
Ware North	WN2	East Hertfordshire	11.24	Moderate	Weak/No	Moderate	Weak/No	Yes
Ware North	WN3	East Hertfordshire	13.07	Moderate	Weak/No	Weak/No	Weak/No	Yes
Ware North	WN4	East Hertfordshire	50.55	Strong	Weak/No	Strong	Weak/No	No
Ware North	WN5	East Hertfordshire	108.48	Strong	Weak/No	Strong	Weak/No	No
Ware North	WN6	East Hertfordshire	131.46	Strong	Weak/No	Strong	Weak/No	No
Ware North	WN7	East Hertfordshire	19.15	Strong	Weak/No	Moderate	Weak/No	No

Settlement	Parcel	Local Authority	Area (ha)	Purpose A contribution rating	Purpose B contribution rating	Purpose C contribution rating	Purpose D contribution rating	Grey belt?
Ware North	WN8	East Hertfordshire	77.49	Strong	Weak/No	Strong	Weak/No	No
Ware North	WN9	East Hertfordshire	31.40	Moderate	Weak/No	Weak/No	Weak/No	Yes
Ware North	WN10	East Hertfordshire	31.23	Strong	Weak/No	Strong	Weak/No	No
Ware North	WN11	East Hertfordshire	99.42	Strong	Weak/No	Strong	Weak/No	No
Ware North	WN12	East Hertfordshire	84.34	Strong	Weak/No	Strong	Weak/No	No
Ware North	WN13	East Hertfordshire	31.71	Strong	Weak/No	Strong	Weak/No	No
Ware North	WN14	East Hertfordshire	52.07	Strong	Weak/No	Strong	Weak/No	No
Ware South	WS1	East Hertfordshire	33.53	Strong	Weak/No	Strong	Weak/No	No
Ware South	WS2	East Hertfordshire	75.16	Strong	Weak/No	Strong	Weak/No	No
Ware South	WS3	East Hertfordshire	19.75	Strong	Moderate	Strong	Weak/No	No
Ware South	WS4	East Hertfordshire	206.08	Strong	Weak/No	Strong	Weak/No	No
Ware South	WS5	East Hertfordshire	4.51	Moderate	Weak/No	Moderate	Weak/No	Yes
Ware South	WS6	East Hertfordshire	101.96	Strong	Strong	Strong	Moderate	No
Ware South	WS7	East Hertfordshire	7.17	Strong	Weak/No	Strong	Strong	No
Ware South	WS8	East Hertfordshire	2.73	Moderate	Weak/No	Moderate	Weak/No	Yes
Ware South	WS9	East Hertfordshire	10.58	Strong	Strong	Strong	Weak/No	No
Ware South	WS10	East Hertfordshire	6.89	Moderate	Weak/No	Moderate	Strong	No
Ware South	WS11	East Hertfordshire	13.35	Strong	Strong	Moderate	Strong	No
Ware South	WS12	East Hertfordshire	96.17	Moderate	Moderate	Moderate	Weak/No	Yes
Ware South	WS13	East Hertfordshire	82.92	Strong	Strong	Strong	Weak/No	No
Ware South	WS14	East Hertfordshire	17.74	Moderate	Weak/No	Moderate	Weak/No	Yes
Ware South	WS15	East Hertfordshire	49.38	Strong	Strong	Moderate	Weak/No	No
Ware South	WS16	East Hertfordshire	3.35	Moderate	Weak/No	Moderate	Strong	No
Ware South	WS17	East Hertfordshire	51.68	Strong	Strong	Strong	Strong	No
Ware South	WS18	East Hertfordshire	9.66	Moderate	Weak/No	Moderate	Weak/No	Yes

Figure 4.1: Contribution to Purpose A (north-west)

Note: Detail ratings for North Herts omitted from below figures

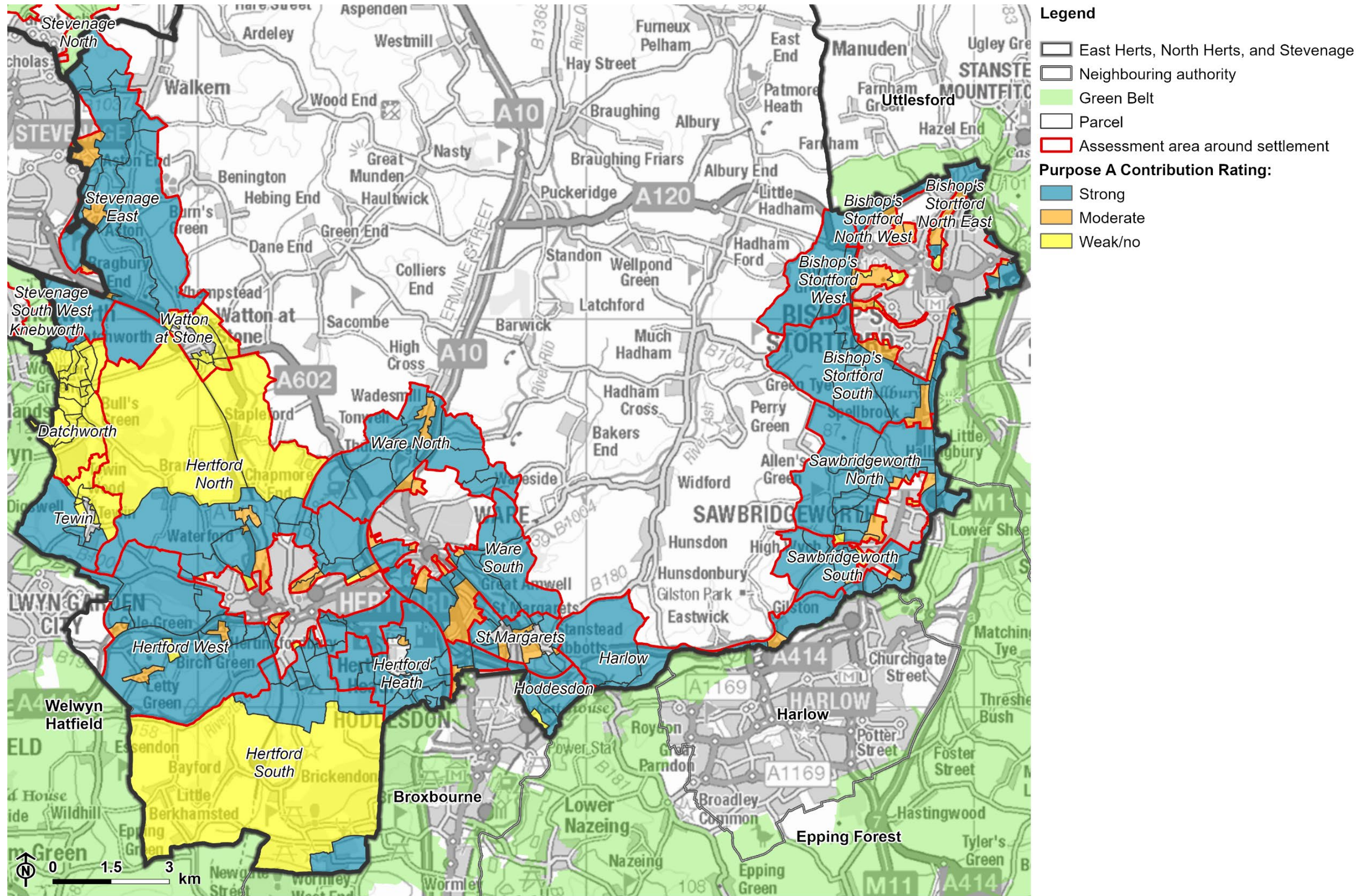


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Figure 4.2: Contribution to Purpose A (south-east)

Note: Detail ratings for North Herts omitted from below figures



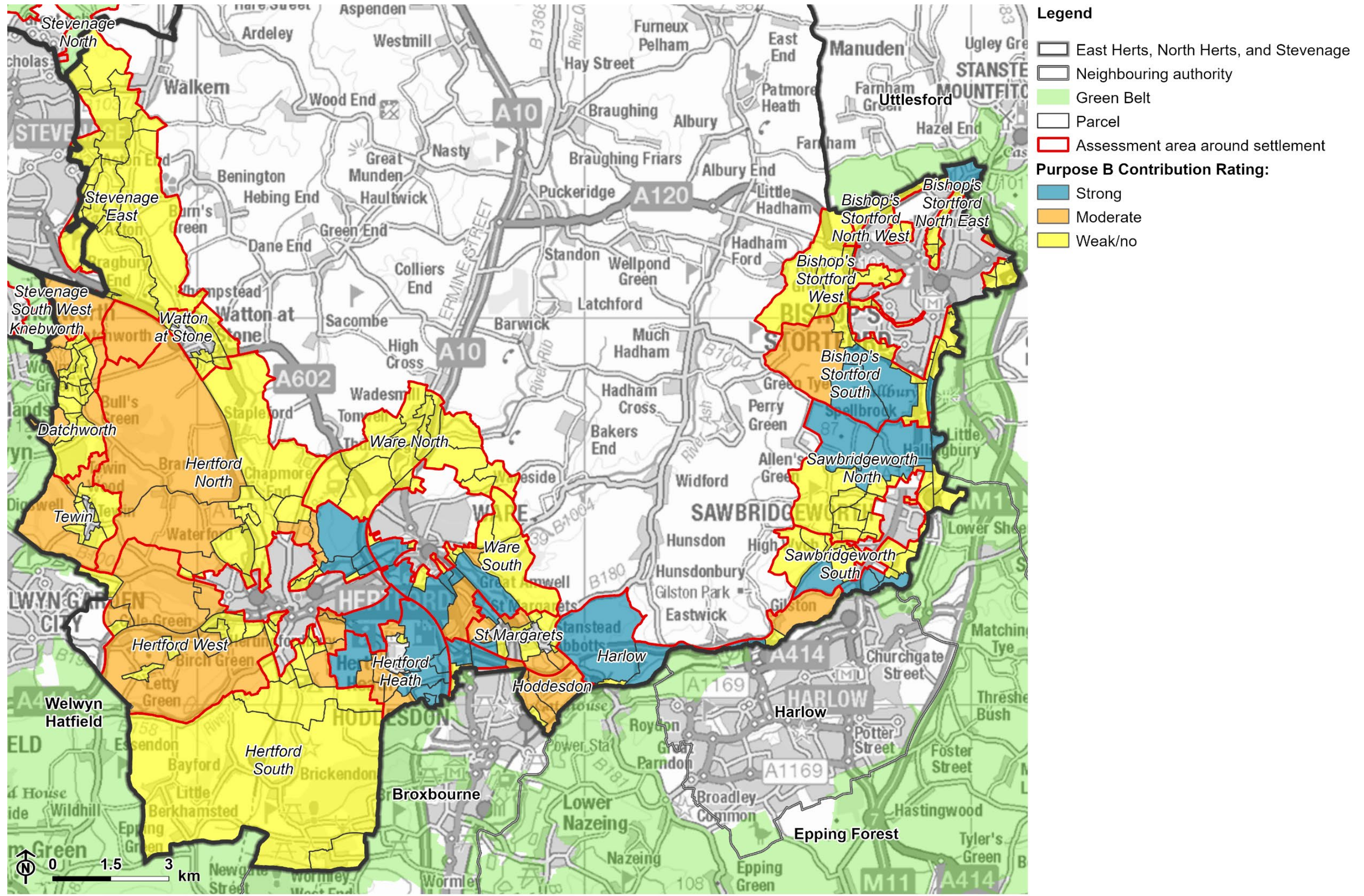
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Figure 4.4: Contribution to Purpose B (south-east)

Note: Detail ratings for North Herts omitted from below figures



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Figure 4.5: Contribution to Purpose C (north-west)

Note: Detail ratings for North Herts omitted from below figures

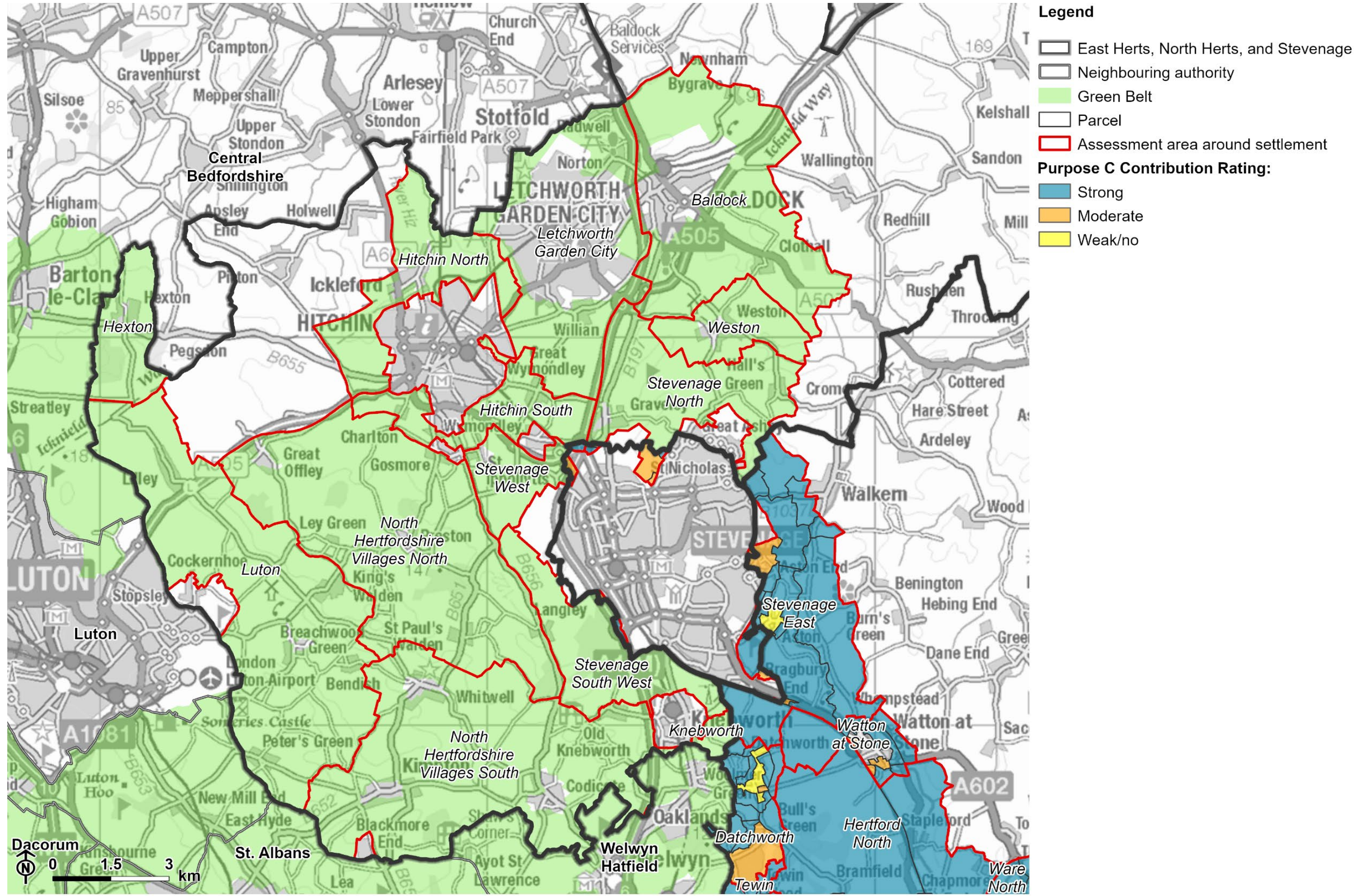


Figure 4.6: Contribution to Purpose C (south-east)

Note: Detail ratings for North Herts omitted from below figures

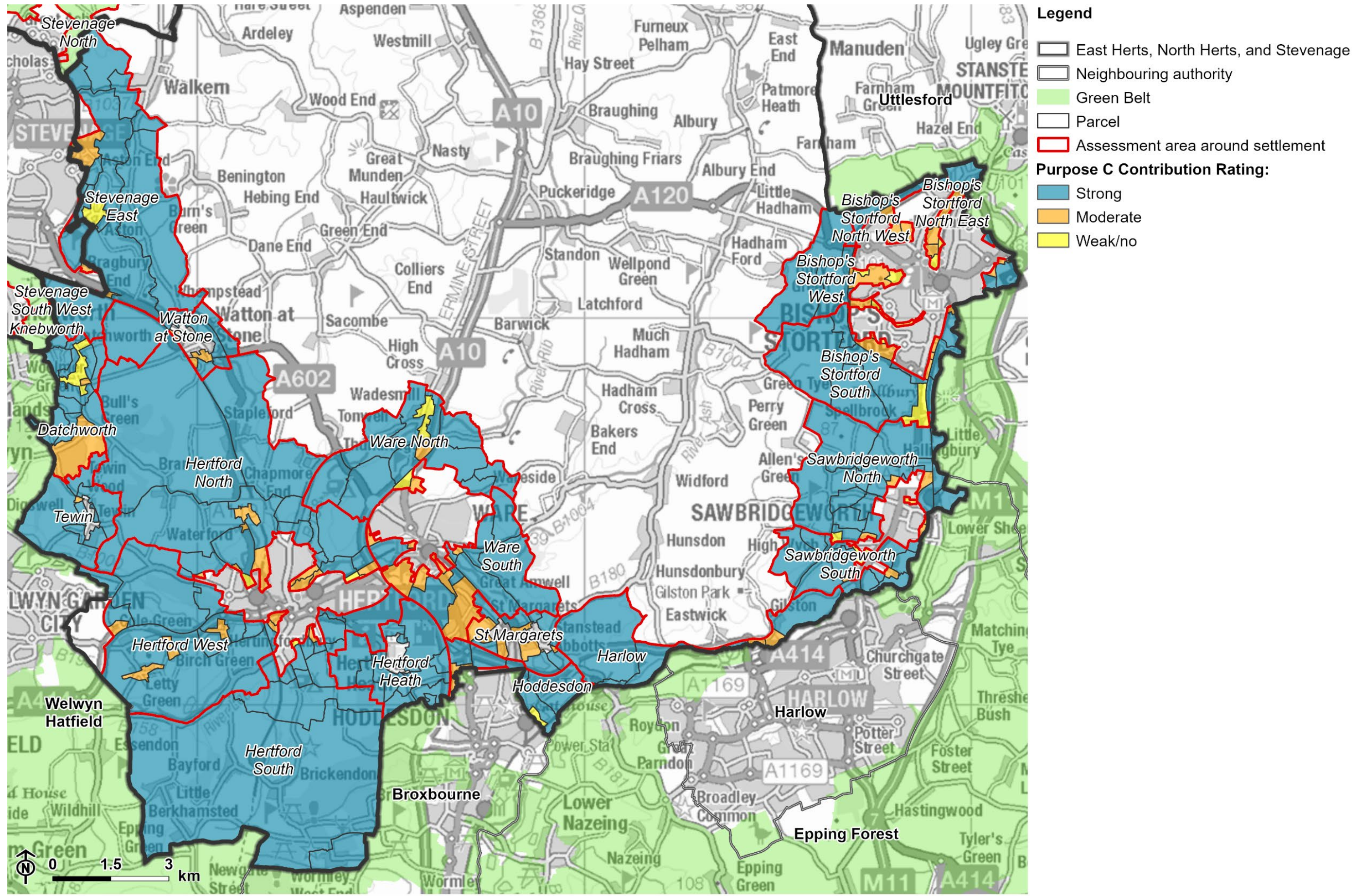
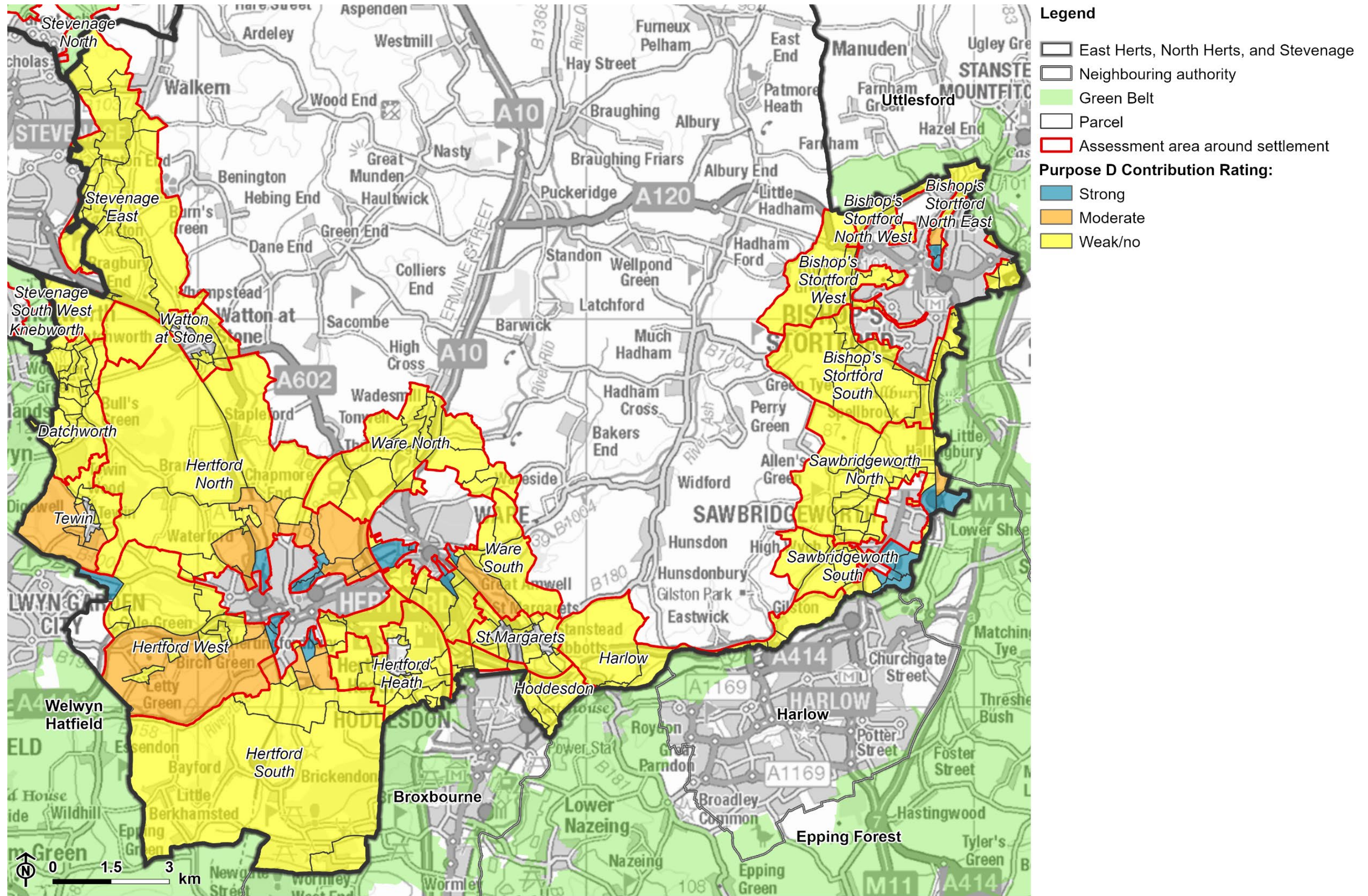




Figure 4.8: Contribution to Purpose D (south-east)

Note: Detail ratings for North Herts omitted from below figures



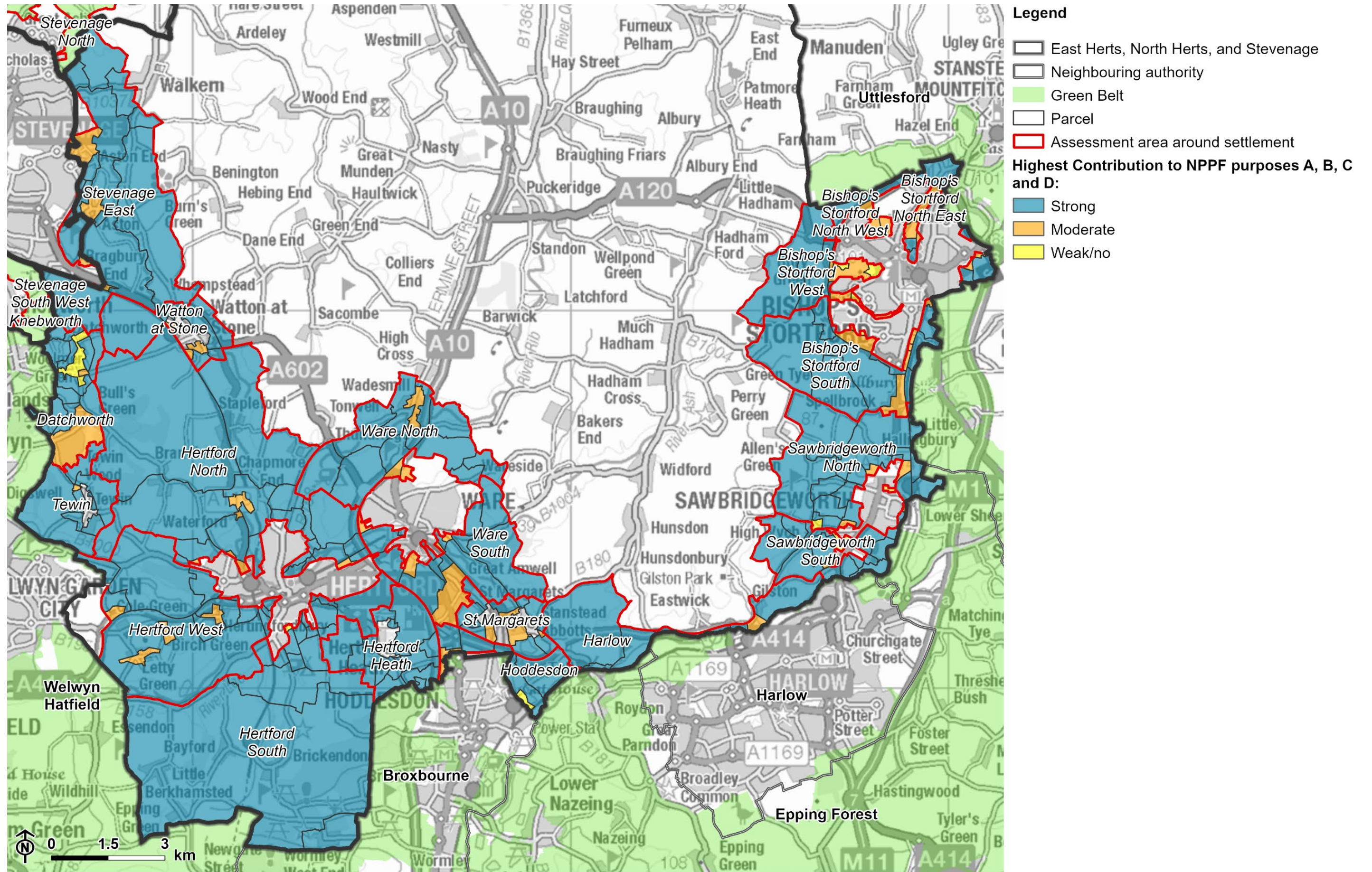
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Figure 4.10: Highest Contribution to NPPF purposes A, B, C and D (south-east)

Note: Detail ratings for North Herts omitted from below figures

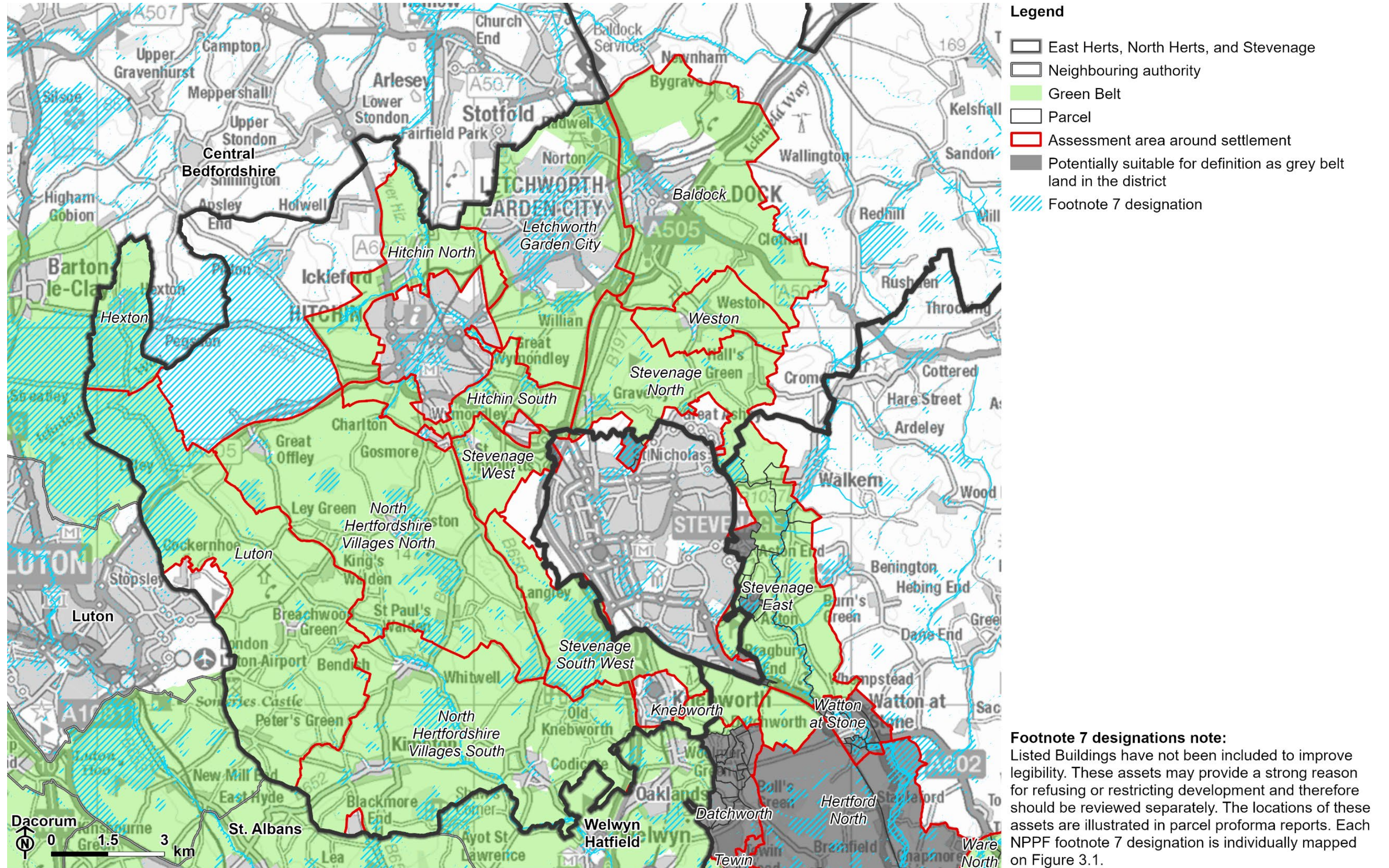


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Figure 4.11: Areas potentially suitable for definition as grey belt (north-west)

Note: Detail ratings for North Herts omitted from below figures



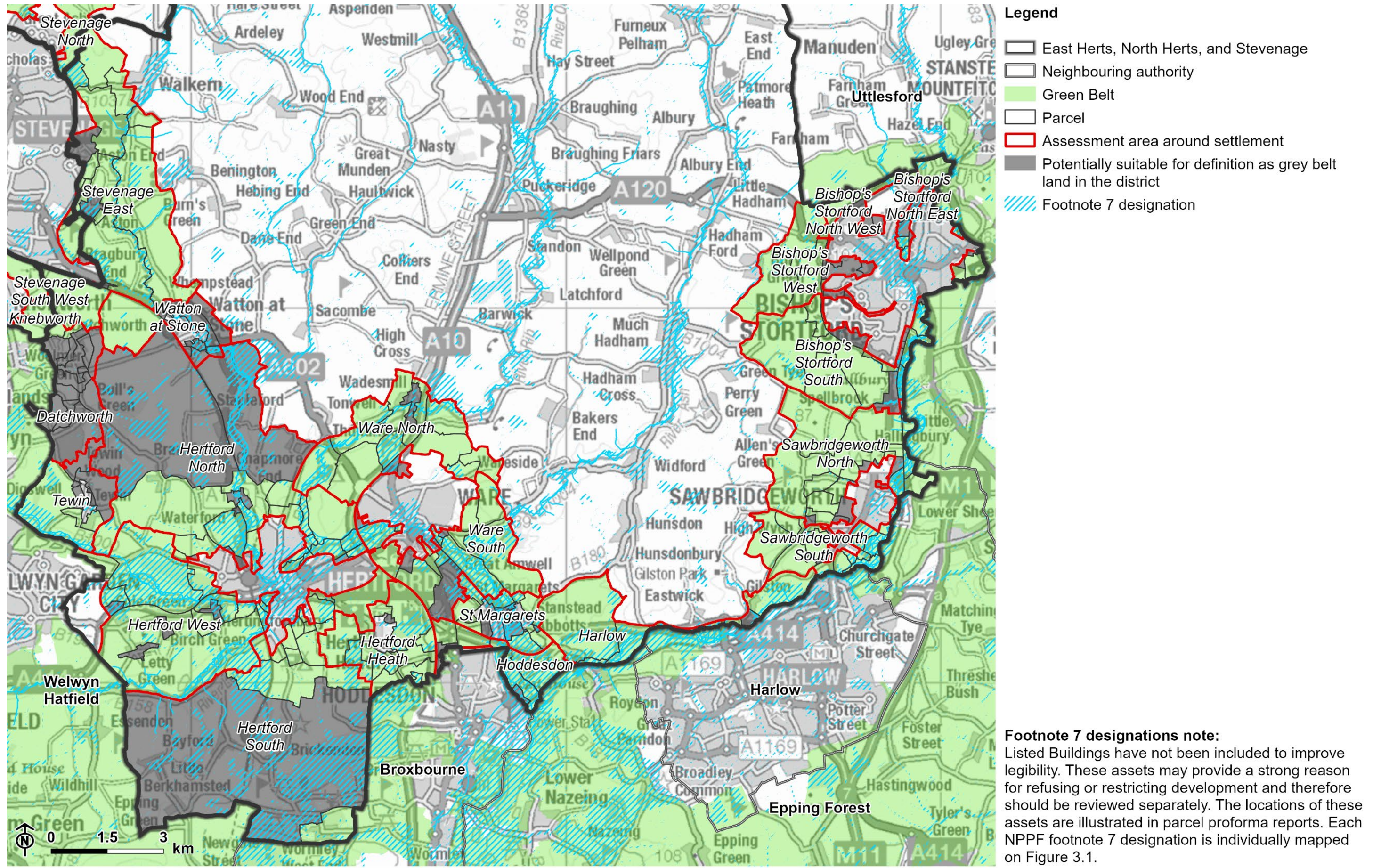
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Figure 4.12: Areas potentially suitable for definition as grey belt (south-east)

Note: Detail ratings for North Herts omitted from below figures



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## Potential for Fundamental Impacts

**4.4** Paragraph 155a within the NPPF states that development in the Green Belt should not be regarded as inappropriate where the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) across the plan area as a whole. As noted in Chapter 3, in the absence of specific development proposals, the variations in contribution to each Green Belt purpose identified in this assessment highlight the areas where Green Belt contribution is at its greatest within the Local Plan area. These areas of highest contribution help give an indication of where release or development could fundamentally and meaningfully undermine the purposes.

**Note: References and analysis relating to findings in North Herts should be treated as 'Draft'.**

**4.5 Figures 4.9 – 4.10.** illustrate the strongest level of contribution each area of the district's Green Belt land makes to Green Belt purposes A, B, C and D (noting that all Green Belt land is judged to make an equal contribution to Purpose E).

**4.6** Urban development in the assessment area is focused around three principal north-south transport corridors: the A1(M) (with a railway line following a nearby route), the A10 and the M11. There are relatively fragile gaps between settlements along these corridors, but typically more robust east-west gaps between the corridors.

### A1(M) corridor

**4.12** Detail analysis omitted as relates to North Herts only.

### A10 corridor

**4.13** The towns of Hertford and Ware lie to either side of the A10 – both abutting it but with a gap in between. Development further weakening this gap, and the separating role of the A10, has the potential to fundamentally undermine Purposes A and B. The gap to the west between Hertford and Welwyn Garden City is more substantial but significant intervening development could still risk coalescence, in particular in the vicinity of the A414.

**4.14** The buffer between Ware and the outer edge of the Green Belt to the east of the town is relatively narrow following Green Belt release, less than 500m at

its narrowest point, so development negating the role of this buffer would constitute a fundamental undermining of the Green Belt purposes.

**4.15** Both Hertford and Ware are historic towns but land making a strong contribution to Purpose D is generally limited to area close to the historic cores, which are less significant in terms of separation between towns. The main exception is land south of the River Lea between the A10 and central Ware, which has a relationship with the historic core and is also key to the separation of the two towns.

**4.16** To the south of Ware, inset development at St Margarets and washed-over but urbanising development at Great Amwell mean that there is relatively fragile separation between Ware and the town of Hoddesdon, which is contiguous with development stretching south into Greater London. Coalescence of settlements in this gap and in particular any perceived loss of separation from Hoddesdon, would be likely to fundamentally undermine Purpose A and potentially also Purpose B.

**4.17** Urban development at Hertford Heath weakens separation between Hertford and Hoddesdon, limiting potential for development without fundamentally undermining the separation of towns. In particular any expansion of Hoddesdon across the A10 in the vicinity of Hertford Heath would have the potential to undermine.

## M11 corridor

**4.18** The towns of Bishop's Stortford, Sawbridgeworth and Harlow lie to the west of the M11. To the north and east of Bishop's Stortford there are relatively narrow strips of Green Belt preventing merger with Stansted Mountfitchet and London Stanstead Airport, both of which lie beyond the Green Belt's outer edge. Significant development in these areas would be likely to fundamentally undermine Purpose A.

**4.19** The valley of the River Stort forms a narrow gap between Sawbridgeworth and Harlow and also forms the outer edge of the Green Belt to the north-west of Harlow. The approval of the substantial Gilston development outside of the Green Belt immediately north of the Stort Valley makes preservation of this narrow strip important to retention of a sense of separation between Harlow and development outside of the Green Belt. With almost 10,000 proposed homes Gilston, although designed as seven separate but nearby villages, will in terms of its overall size be large enough to treat as a town and large built-up area in terms of the Green Belt purposes.

**4.20** The potential to fundamentally undermine Purpose A is greatest where clear, consistent boundary features would be breached by development, or where development would risk merging a distinct settlement into one of the large built-up areas. Development of the areas noted above in relation to Purpose B would also represent significant impact in relation to Purpose A: development crossing the A1M or railway lines, the A10 between Hertford and Ware, or significant loss of separation between Knebworth and Stevenage, or Stevenage from Hitchin, Letchworth Garden City or Baldock.

## Other locations

**4.21** Development in countryside areas that are more remote from any substantial urban area, such as in the parcels in the more rural area between Stevenage and Luton, will have a significant impact on Purpose C but, unless particularly large in scale, is unlikely to affect any other Green Belt purpose and so less likely to be considered to fundamentally undermine the Green Belt purposes. Most of this area was added to the Green Belt in the 2022 North Hertfordshire Local Plan in order to direct development away from this rural area and towards more sustainable locations in the vicinity of larger settlements.

**4.22** The omission of Green Belt Purpose C – safeguarding the countryside from encroachment – from consideration in the identification of grey belt means that most of the Green Belt area added in 2022 has been defined as potential grey belt, but it should be noted that in order for any development proposals to be considered inappropriate they must, as part of the requirements set out in NPPF paragraph 155 (quoted in paragraph 5.8 below) be shown to be in sustainable locations. This reflects a key intention of the added Green Belt.

**4.23** It should also be noted that, whilst there is potential in rural areas such as this for new development that would not significantly affect Purposes A or B, substantial development could still be considered to have a significant impact in terms of one or more of those Green Belt purposes. This would certainly be the case were development to constitute a new town, but for a smaller though still substantial development consideration would also need to be given as to:

- Whether separation from the nearest large built-up area would be weakened, such that land adjacent to the new/expanded development area could now be considered close enough for Purpose A to be relevant; and

- Whether separation between towns would be weakened to the extent that the relevance of Purpose B would be significantly increased.

## Making judgements

**4.24** It is not possible to make any more definitive judgements on what constitutes a fundamental impact without a clearer understanding of the exact location of release or development in the district, its scale and land use, including what Green Belt land would remain within a plan area.

**4.25** Once the Councils are in a position to evaluate specific proposals for Green Belt release or development, it will be possible to make a definitive judgement as to whether they would (individually or cumulatively) fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as whole. The development of parcels individually identified as grey belt could still, as part of a cumulative set of developments or a single very substantial development, have sufficient impact to cause a fundamental undermining of the Green Belt purposes.

## Parcel Assessments

**4.26** Parcel outputs are detailed in Appendix A below. These are organised by settlement area (the assessment areas around settlements shown on the overview maps in **Figures 4.1 to 4.12**), with reference codes assigned for each settlement. In cases where a parcel lies adjacent to more than one settlement it has been assigned a code relating to one of them, but the assessment considers the impact of expansion of all adjacent settlements.

**4.27** The outputs for each parcel include:

- A map to show the location of the parcel, indicating any Footnote 7 designations (with separate key entries to show what the constraints are)
- An aerial view, with the parcel boundaries indicated
- Boxes and wording to indicate ratings for contribution to each of the five Green Belt Purposes, followed by a conclusion as to whether the parcel is considered to be grey belt.
- A brief locational description of the parcel, noting its relationship with settlement(s) and its size, followed by a description of the relationship between the parcel, urban areas and the wider Green Belt countryside.

- A summary of the key factors supporting the assessed contribution rating for each the purposes A-D (as described under each Purpose heading above).
- For Purpose E the rating is 'equal', with text stating that "All Green Belt land plays an equal role in relation to this purpose".
- Concluding text to indicate whether the parcel is identified, provisionally, as grey belt, on the basis of its contribution ratings and in line with the February 2025 PPG.

## Chapter 5

### Next steps

**5.1** This chapter sets out the key issues that the Councils will need to have regard for when considering the findings of this report and if they decide to proceed with the release of land from the Green Belt.

### Exceptional Circumstances

**5.2** In considering the potential release of Green Belt land, whether identified as grey belt or otherwise, the Councils will need to weigh a number of interrelated factors to ensure decisions are both robust and consistent with national policy.

**5.3** For plan-making purposes, the first step will be to consider whether exceptional circumstances exist to justify changes to Green Belt boundaries. Paragraph 147 of the NPPF states that:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.”

**5.4** This includes considering: a) the prioritisation of brownfield sites and underutilised land outside of the Green Belt; b) optimisation of the density of development; and c) having discussion with neighbouring authorities about whether they could accommodate any of the identified need for development.

### Prioritisation

**5.5** Should it be considered that exceptional circumstances are justified then priority should be given to Green Belt land in the following order:

- Previously developed land (PDL), including land that is Grey Belt;
- Grey Belt which is not previously developed land;
- Other Green Belt locations (prioritising least strong areas)

**5.6** PDL, by definition, generally makes a more limited contribution to the purposes of the Green Belt and is generally regarded as being more suitable for development, subject to detailed considerations. Where PDL is not available or

insufficient to meet identified needs, attention may then focus on other areas of grey belt.

**5.7** Any assessment of the impact of releasing sites for development will also need to:

- Consider whether the application of policies relating to the areas or assets in footnote 7 would provide a strong reason for restricting development. This may require further analysis. It is noted that the proposed NPPF reforms published for consultation in December 2025 include a change to the definition of grey belt to remove the need to consider impact on footnote 7 areas or assets in order to determine whether land can be identified as grey belt. This change, if it goes ahead, does not negate the need to consider the impact of specific development proposals on footnote 7 areas and assets alongside wider sustainability considerations. The guidance note describing the proposed reforms states that the revised definition “seeks to enable grey belt to be identified with greater certainty, whilst continuing to ensure that these areas receive the same level of protection as elsewhere in the Framework.”
- Address the potential for the purposes of the Green Belt to be fundamentally undermined across the plan area as a whole. For a local plan, this will require the cumulative effect of any proposed allocations to be considered: while the incremental release of individual sites may appear limited the combined impact could be significantly greater. The Council should, therefore, take a broad strategic perspective when identifying potential allocations.

**5.8** As set out in NPPF paragraph 155, the utilisation of grey belt land and avoidance of fundamentally undermining the Green Belt purposes are not sufficient to render development in the Green Belt ‘not inappropriate’. There is also a requirement for:

- Demonstration of unmet need for the type of development proposed;
- The development to be in a sustainable location;
- The ‘Golden Rules’ to be met.

**5.9** The paragraphs below make further reference to sustainability and the Golden Rules.

## Sustainability

**5.10** Notwithstanding the above hierarchy of Green Belt land, in all instances the need to promote sustainable development in accordance with paragraphs 110 and 115 of the NPPF is determinative. In short, where land is not in a location that is, or can reasonably be made, sustainable, its release for development would be inappropriate. The question of sustainability should be judged in relation to local context and the characteristics of the site or proposed development (particularly if development is “significant”), though authorities are expected to maximise opportunities for sustainable transport solutions in line with NPPF paragraphs 110 and 115 (albeit whilst acknowledging these opportunities will vary between urban and rural areas).

**5.11** It is important to recognise that despite grey belt policy seeking to unlock more Green Belt locations for development, in practice the Council is still required to meet its development needs in a sustainable way. This is explicit in paragraph 148 of the NPPF which concludes:

“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”.

**5.12** Where identified need, cannot be met through PDL and Grey Belt land alone, and other Green Belt locations are required, using the Sustainability Appraisal underpinning the Local Plan Evidence Base alongside this assessment will allow for the identification of alternative site options in a manner that likely achieves the sustainable development objectives sought by paragraphs 110, 115 and 148 of the NPPF.

**5.13** Finally, should the Councils conclude that Green Belt release is necessary, close attention must be given to the redefinition of Green Belt boundaries. Paragraph 149 of the NPPF makes clear that new boundaries must be defined clearly, using physical features that are readily recognisable and likely to be permanent. Establishing clear and defensible boundaries is central to ensuring the long-term integrity of the Green Belt.

## The Golden Rules

**5.14** NPPF paragraph 155 states that “Where major development involving the provision of housing is proposed on land released from the Green Belt through

plan preparation or review, or on sites in the Green Belt subject to a planning application, the following contributions ('Golden Rules') should be made:

- affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below;
- necessary improvements to local or national infrastructure; and
- the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

**5.15** NPPF paragraph 157 provides further detail in relation to affordable housing, stating that "Before development plan policies for affordable housing are updated in line with paragraphs 67-68 of this Framework, the affordable housing contribution required to satisfy the Golden Rules is 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default. The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability."

**5.16** The Golden Rules do not apply to developments brought forward on land released from the Green Belt through plans that were adopted prior to the publication of this Framework, or to developments that were granted planning permission on Green Belt land prior to the publication of the NPPF.

**5.17** The 50% cap for affordable housing does not apply to rural exception sites or community-led development exception sites, or if the local planning authority has a relevant existing policy which would apply to the development which is above 50%.

## Enhancement of Green Belt

**5.18** The 'Golden Rules' are supported by the NPPG which suggests the following considerations:

- New residents and the wider public should be able to access good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.

- Accessible green spaces are areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions.
- Where possible access to green spaces should include safe active travel routes and should be served by public transport, which also means providing the necessary infrastructure (such as footpaths and bridleways).
- Proposals should consider how the creation or enhancement of existing green spaces can contribute to the priorities for nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.
- Where appropriate, authorities should consider the use of conditions or planning obligations. The Community Infrastructure Levy can also be used to fund improvements to existing greenspaces or the provision of new ones. Local authorities should consider arrangements for the long-term maintenance of green spaces.

**5.19** It is therefore important that the Councils consider where and how the Green Belt can be enhanced, particularly the relationship between the Councils preferred sustainable pattern of development and the designations' potential for new and improved appropriate uses. Introducing or enhancing uses of Green Belt land that add to its value will strengthen the case for that land's future protection. Some examples are provided in the list below:

- Improving access. Enhancing the coverage and condition of the rights of way network and increasing open space provision is a key enhancement opportunity.
- Providing locations for outdoor sport. Some outdoor sports can represent an urbanising influence; an emphasis on activities which do not require formal facilities is less likely to harm Green Belt purposes.
- Landscape and visual enhancement. Using landscape character assessment as guidance, intrusive elements can be reduced and positive characteristics reinforced.
- Increasing biodiversity. Most Green Belt land has potential for increased biodiversity value – for example the management of hedgerows and agricultural field margins, provision of habitat connectivity and planting of woodland. There may also be opportunities to link enhancements with requirements to deliver 'biodiversity net gain' associated with development proposals.

- Improving damaged and derelict land. Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to characteristics/qualities which help it contribute to Green Belt purposes.

**5.20** Beneficial uses could be achieved through planning conditions, Section 106 obligations and/or the Community Infrastructure Levy (CIL) policies; however, the Levelling Up and Regeneration Act 2023 will introduce a new Infrastructure Levy (IL), which is intended to replace CIL and certain Section 106 obligations over time. It remains to be seen how and when this new levy will be rolled out and whether the Councils will be required to implement it.

**5.21** There is benefit in early engagement with landowners and other interested parties, to obtain the necessary local consents, establish a detailed scope of works and identify a means of funding design, construction and management.

## Definition of Green Belt Boundaries

**5.22** NPPF paragraph 149 requires Green Belt boundaries to be defined clearly, “using physical features that are readily recognisable and likely to be permanent”.

**5.23** Boundary treatment can help to limit the impact of development on remaining Green Belt land, so the Council could give consideration to the following:

- Using landscape to help integrate a new Green Belt boundary with the existing edge, aiming to maximise consistency over a longer distance. This can help to maintain a sense of separation between urban and open land. A boundary that is relatively homogeneous over a relatively long distance, such as a main road, is likely to be stronger than one which has more variation.
- Strengthening boundaries at weak points – for example where ‘breached’ by roads. This can help reduce opportunities for sprawl. The use of buildings and landscaping can create strong ‘gateways’ to strengthen settlement-edge function.
- Defining Green Belt edges using strong, natural elements which form a visual barrier – for example a woodland belt. This can help to reduce the perception of urbanisation and may also screen residents from intrusive landscape elements within the Green Belt (for example major roads). Boundaries that create visual and movement barriers can however

potentially have detrimental effects on the character of the enclosed urban areas and the amenity of residents so this needs to be carefully considered.

- The ownership and management of landscape elements which contribute to Green Belt purposes. Control of boundary features can help to ensure the permanence of Green Belt: trees and hedgerows require management to maintain their value in Green Belt terms, and the visual screening value that can be attributed to them is more limited if they are under private control (for example within back gardens).
- Use of sustainable drainage features to define/enhance separation between settlement and countryside. This can help to strengthen the separation between urban and open land. It is important however to determine if local topography and ground conditions are suitable.

# Appendix A

## Parcel Assessments

**A.1** See separate documents for parcel assessment outputs, organised by settlement area.

**A.2** The following copyright information is applicable to the mapping accompanying parcel assessments:

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**A.3** NPPF Footnote 7 designations not listed and mapped in Appendix A parcel figures are generally not located within the study area or local data sets were not readily available.

**A.4** Available listed building point data has been mapped to draw attention to the location of these NPPF footnote 7 assets. Like other footnote 7 areas and assets, their presence highlights the need for further detailed work to establish the effects on these assets.

## References

- 1 Ministry of Housing, Communities and Local Government published a revised version of the [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2) (December 2024.). Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 2 Footnote 55 of the [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2) (December 2024.) Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 3 Ministry of Housing, Communities and Local Government (2025) [Planning Practice Guidance](https://www.gov.uk/government/collections/planning-practice-guidance) (PPG) Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>.
- 4 Peter Brett Associates (2015), East Herts Green Belt Review.
- 5 North Herts District Council (2018), North Hertfordshire Local Plan 2011-2031 - Green Belt Review Update 2018.
- 6 North Herts District Council (2016), North Hertfordshire Green Belt Review.
- 7 Amec Foster Wheeler (2015), Review of the Green Belt around Stevenage.
- 8 NPPF definition of 'Habitat Site': Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.
- 9 NPPF definition of 'Heritage Asset': A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).
- 10 Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.
- 11 Some Irreplaceable Habitat data sets are more up-to-date than others. Consequently, their extent mapped in this study may require refinement

following detailed site-specific work through the typical development management process.

- 12** Robin Buchanan, January 2025 with regards to Suite 1, The Stables, Cannons Mill Lane, Bishop's Stortford CM23 2BN (Appeal Ref: APP/J1915/W/24/3339916)
- 13** The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.
- 14** The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.
- 15** Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.
- 16** Planning Inspectorate, David Smith, Report to the Council of the London Borough of Redbridge regarding the Examination of the Redbridge Local Plan 2015-2030 (January, 2018). Available at: <https://www.redbridge.gov.uk/media/4732/redbridge-local-plan-inspectors-report.pdf>

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