

Green Belt Assessment

Member briefing: 16 June 2026



Purpose

- Introduction to the work prior to DPEP meeting, 23 June
- Outline the role of Green Belt and national policy around it
- Show the extent of Green Belt in East Herts and what it affects
- Discuss the recent changes to Green Belt policy, including grey belt
- Outline what that means for East Herts and the Local Plan
- Discuss how the government wants authorities to assess Green Belt
- Show how the assessment has been done in East Herts
- Outline the results and what that might mean
- Dispel some popular misconceptions about grey belt



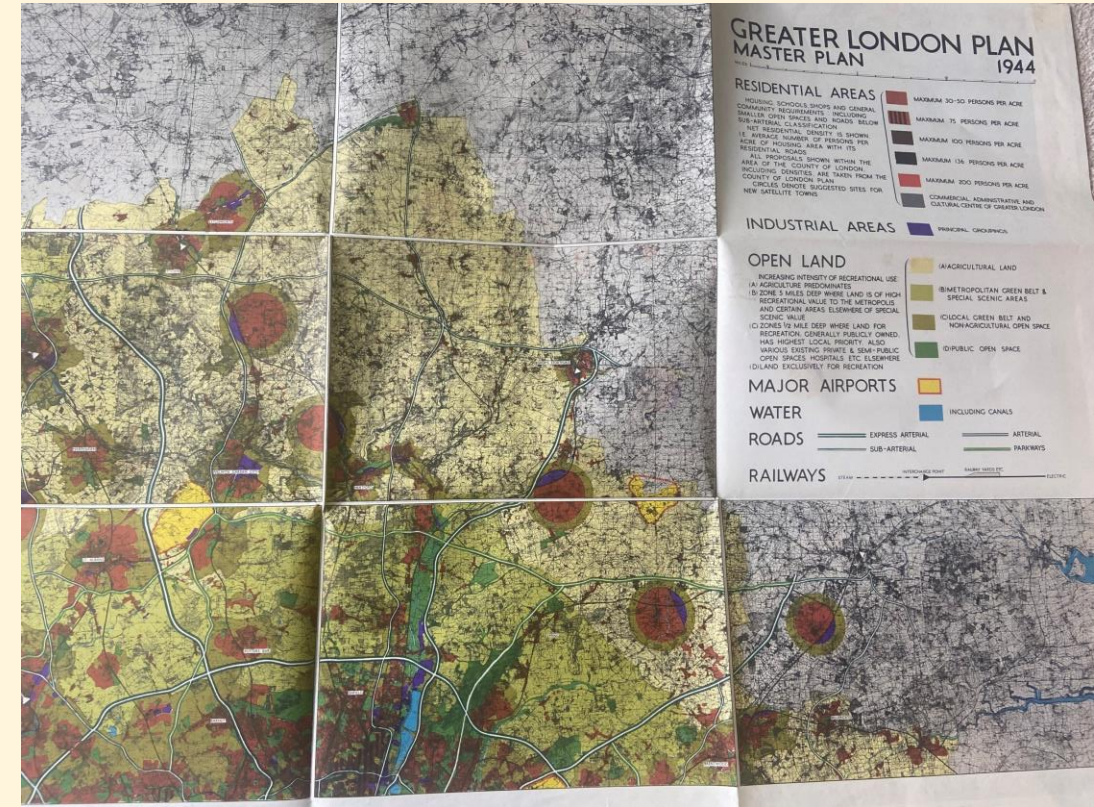
Purpose / Who's here

- Richard Crutchley, Team Leader, Planning Policy
- Claire Sime, Assistant Director for Place
- Planning Policy Team
- Sarah Young, Director at LUC
- Richard Swann and Jon Bannister from LUC



Context

- Green Belt in Hertfordshire is part of the Metropolitan Green Belt around London, established in the 1944 London Plan
- Since maintained, defined and amended by successive local / district plans
- East Hertfordshire has 16,450ha of Green Belt (34.6% of the district)
- Focused around the main settlements in the south of the district and between settlements of Stevenage, Welwyn, Hoddesdon and Harlow outside of the district
- Detailed Government guidance on the Green Belt in the **National Planning Policy Framework** (NPPF)



Aim and purposes of the Green Belt

- The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open
- Their essential characteristics are their 'openness and permanence' [Paragraph 142 of the NPPF]
- The five purposes of the Green Belt [Paragraph 143]:
 - 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.
- Development in the Green Belt is **inappropriate** (unless covered by an exception)
- **Inappropriate development** is by definition harmful to the Green Belt



Grey Belt

- Concept introduced through NPPF in December 2024
- Defined as, 'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d).
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - d) to preserve the setting and special character of historic towns.
- After considering previously developed land, grey belt land should be prioritised for release to meet development need
- One of the main purposes of the **Green Belt assessment** is to determine the extent to which land within the Green Belt contributes to purposes (a-e)
- This is then used to identify grey belt land that does not make a strong contribution to purposes (a), (b) or (d).



Background

- LUC appointed to undertake an assessment of Green Belt land across North Herts, East Herts and Stevenage
- Enabled through an MHCLG grant awarded to help authorities across the country assess their green belt in light of changes to national policy on Green Belt
- Commenced in May 2025
- Updates previous study, undertaken in 2015
- Critical to considering the strategy for the new Local Plan
- LUC are independently undertaking a similar assessment in Broxbourne



Grey belt

NPPF paragraph 143 - Green Belts serve five purposes:

- (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.
- (e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF Annex 2: grey belt = 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.



Grey belt

NPPF Footnote 7 = Framework policies relating to:

- habitat sites(SPA, SAC, Ramsar, or compensatory sites for these), Sites of Special Scientific Interest;
- Local Green Space;
- National Landscape, National Park (or within the Broads Authority) or defined as Heritage Coast;
- irreplaceable habitats (including Ancient Woodland);
- designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and
- areas at risk of flooding or coastal change.



Grey belt context

NPPF paragraph 155 states homes, commercial and other 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) 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 paragraphs 110 and 115 of this Framework; and
- Where applicable the development proposed meets the 'Golden Rules' requirements [affordable housing, necessary contributions to local or national infrastructure, access to green spaces].

** Just because land is grey belt does not mean that it is suitable for development*



Guidance and methodology

- No guidance before Feb 2025
- Feb 2025 national Planning Practice Guidance (PPG) – equivalent status to NPPF
- Encourages use of smaller parcels in areas of greater variation/potential for development
- 'Illustrative features' of strong/moderate/weak contribution to Green Belt purposes A, B & D
- Uses terminology with scope for interpretation...



Guidance and methodology

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

This purpose relates to the sprawl of large built up areas. Villages should not be considered large built up areas.

Contribution

Illustrative features

Strong

Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development.
They are also likely to include all of the following features:

- be adjacent or near to a large built up area
- if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)

Uses terminology with scope for interpretation, e.g.:

- Restrict and contain
- Near to
- Incongruous pattern



Guidance and methodology

Purpose B – to prevent neighbouring towns merging into one another

This purpose relates to the merging of towns, not villages.

Contribution	Illustrative Features
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Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
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Uses terminology with scope for interpretation, e.g.:

- Substantial part
- Loss of visual separation



Guidance and methodology

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

This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.

Uses terminology with scope for interpretation, e.g.:

- Considerable contribution
- But is not limited to

Contribution	Illustrative Features
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Strong	Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: - form part of the setting of the historic town - make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
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LUC methodology

- Methodology defines key terms
- Defines large built-up areas / towns / historic towns
- Explains process of defining parcels: end product rather than start point
- Parcels defined reflect identified variations, rather than assessing predefined areas
- Relationship between urban and open land (boundary features, landform, perception of urban areas, development in parcel, relationship with wider Green Belt)
- Minimum parcel size = 1 hectare
- Much larger parcels where no significant variation in contribution

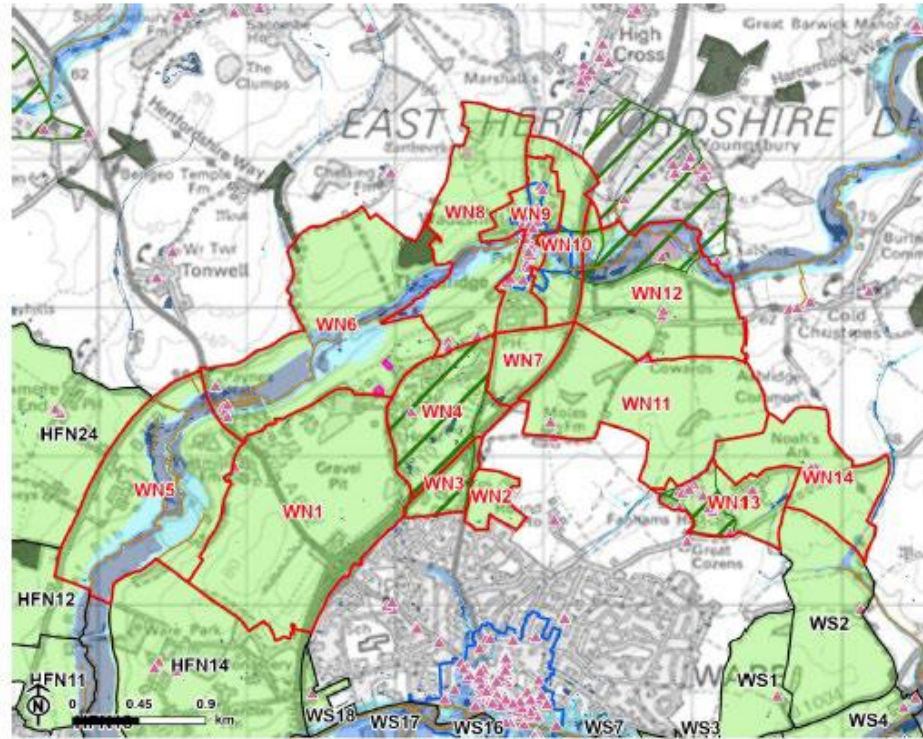


Assessment findings

Example parcel assessment output (Ware North, parcel WN1)



Designations in Ware North



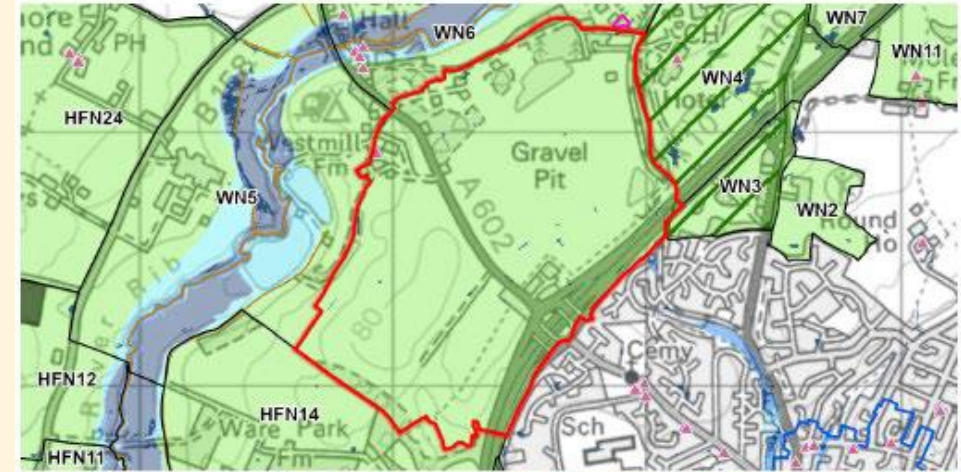
- Ware North parcel
- Neighbouring parcel
- Local authority
- Neighbouring authority
- Green Belt

NPPF Footnote 7 designations

- ▲ Listed building
- Chalk river
- Site of Special Scientific Interest
- Ancient woodland
- Flood zone 3
- Flood zone 2
- High risk of surface water flooding
- Conservation area
- Scheduled monument
- Registered Parks and Gardens



Parcel WN1



- Parcel WN1
- Neighbouring parcel
- Green Belt

NPPF Footnote 7 designations

- ▲ Listed building
- Chalk river
- Site of Special Scientific Interest
- Ancient woodland
- Flood zone 3
- Flood zone 2
- High risk of surface water flooding
- Conservation area
- Scheduled monument
- Registered Parks and Gardens
- Flood zone 3b

Parcel WN1

Contribution of land in Parcel WN1

Parcel WN1 Assessment Conclusions

Purpose A	Purpose B	Purpose C	Purpose D	Purpose E	Grey Belt
Strong	Weak/No	Strong	Weak/No	Equal	No

Parcel WN1 Description

Parcel Location, Land Uses and Boundaries
Land located north-west of Ware. Parcel size: 153ha. There is a consistent strong boundary feature between the settlement and the parcel. The A10 and associated woodland combine to form a strong boundary feature. There is some change in landform which creates a sense of separation between the settlement and the parcel. Land in the parcel rises away from the settlement edge. There is a weak perception of urban development outside of the parcel. There is some urbanising activity in the parcel but land use also associates the area with the wider countryside. Urbanising influences in the parcel are predominantly appropriate Green Belt uses, including agriculture and mineral extraction. However, there is some residential and amenity development. There is a strong perception of the wider countryside, limiting the impact of any existing urbanising influence. The elevated landform affords long reaching views of the wider countryside to the north, east and west.

Purpose A: Checking the unrestricted sprawl of large built-up areas:

Strong contribution

Assessment Considerations	Assessment
Is the parcel adjacent or near to a large built-up area?	The parcel is adjacent to a large built-up area. Ware is a town and so is defined as a large built-up area.
What is the extent of urbanising development in the parcel?	There is some urbanising development in the parcel.
What is the extent of urbanising influence from outside the parcel?	The parcel is predominantly free from urbanising influences associated with development outside the parcel.
Are there physical features in reasonable proximity that could restrict and contain development?	The parcel lies beyond physical features which are restricting and containing urban development. Therefore its weakening or loss would have an adverse impact on this purpose. Development in the parcel would negate the role of the A10 and associated woodland which currently give the parcel a strong sense of separation from urbanising influences.

Parcel WN1

Assessment Considerations	Assessment
Would development form an incongruous pattern in relation to the large built-up area?	Development in the parcel would create an incongruous pattern of development by breaching strong physical features currently restricting and containing an urban area. The A10 and associated woodland between the parcel and the urban edge mean that the parcel has a strong sense of separation from the urban area, so development here would be incongruous with the urban pattern.

Purpose B: Preventing neighbouring towns from merging:

Weak/No contribution

Assessment Considerations	Assessment
Does the parcel lie in a gap between towns?	The parcel does not lie within or on the periphery of a gap between towns that are close enough to be considered neighbouring in this location.
What is the extent of urbanising development in the parcel?	N/A
Does the parcel form a substantial, small or very small part of the gap?	N/A
Would development result in loss of visual separation between towns?	N/A

Purpose C: Assisting in safeguarding the countryside from encroachment:

Strong contribution

Assessment Considerations	Assessment
Is land within the parcel countryside?	The parcel is part of the countryside and so contributes to preventing encroachment on it.
What is the extent of urbanising development in the parcel?	There is some urbanising development in the parcel.
What is the extent of urbanising influence from outside the parcel?	The parcel is predominantly free from urbanising influences associated with development outside the parcel.
Would development impact adjacent Green Belt land?	Development in the parcel would significantly increase the urbanising influence on adjacent open land. The



Parcel WN1

Assessment Considerations	Assessment
	parcel is elevated, so development within the parcel would in turn increase the urbanising impact of development on adjacent open land.

Purpose D: Preserving the setting and special character of historic towns:

Weak/No contribution

Assessment Considerations	Assessment
Does the parcel have a relationship with a historic town(s)?	The parcel forms part of the setting of a historic town. The parcel forms part of the setting of the historic town of Hertford and Ware.
What is the extent of urbanising development in the parcel?	There is some urbanising development in the parcel.
To what extent does the parcel contribute to the setting and special character of historic town(s)?	The parcel makes no notable contribution to the town's special character. The parcel forms part of the wider agricultural landscape which surrounds Hertford and Ware, but it does not currently form part of the setting of the historic town which would contribute to its heritage significance.

Purpose E – Assisting in urban regeneration:

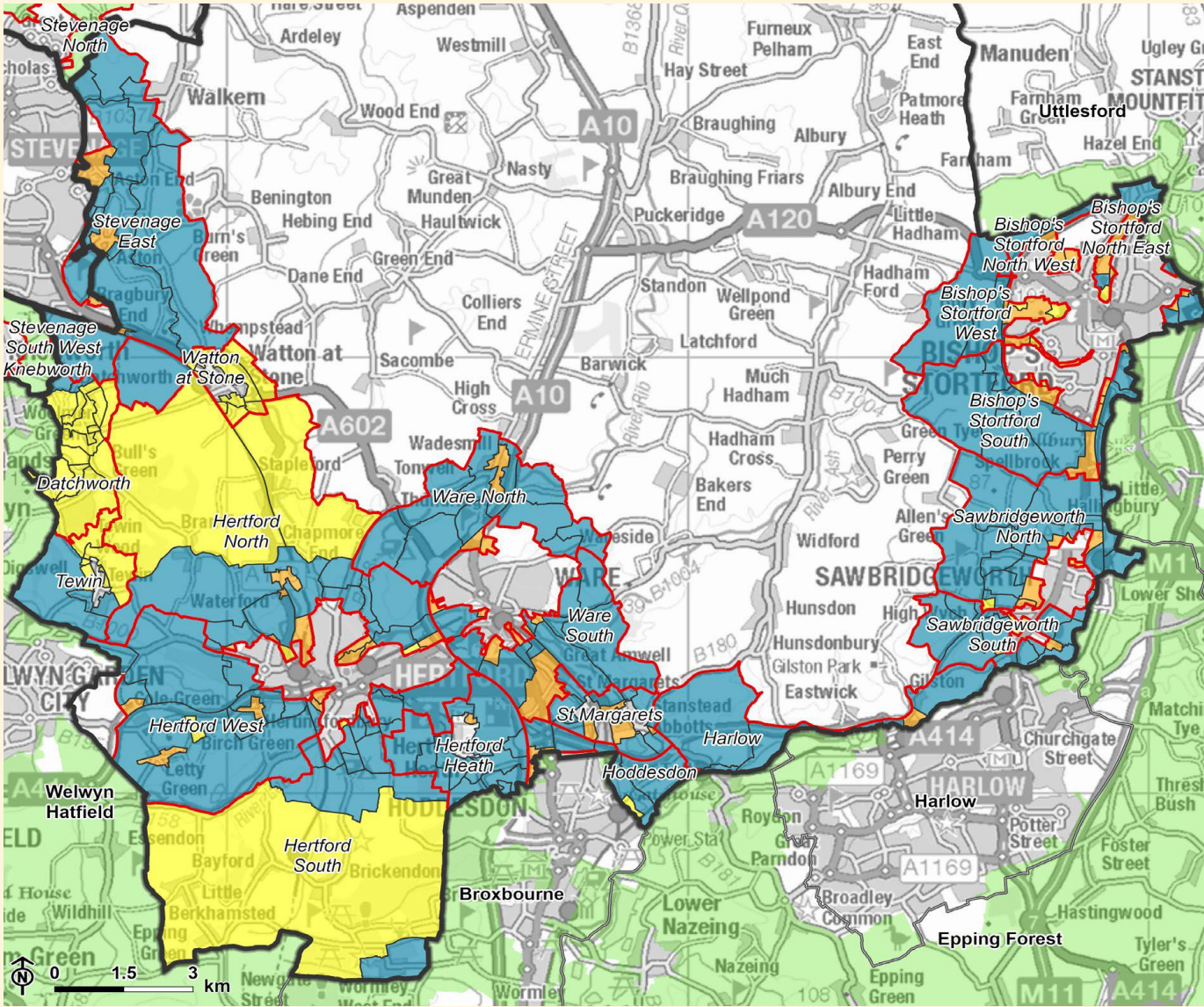
Equal contribution

All Green Belt land plays an equal role in relation to this purpose.

Grey Belt

The parcel makes a strong contribution to Green Belt Purpose A and therefore does not meet the definition of grey belt land.

Assessment findings

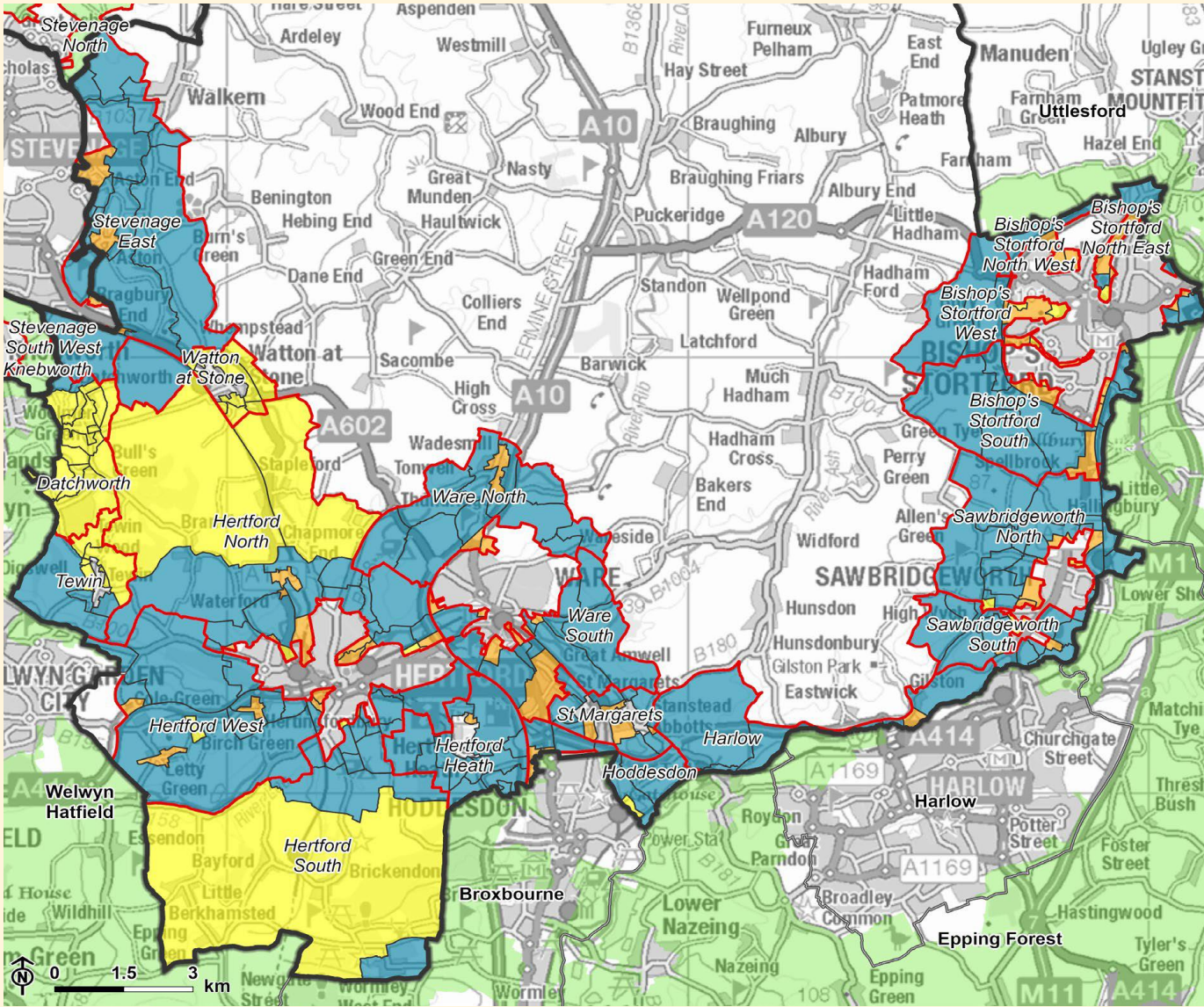


Purpose A: checking sprawl of large built-up area

- Is parcel near to a large built-up area?
- Is there urbanising development in it?
- Are there other urbanising influences?
- Would development be 'restricted and contained'?
- Would development form an incongruous pattern?



Assessment findings

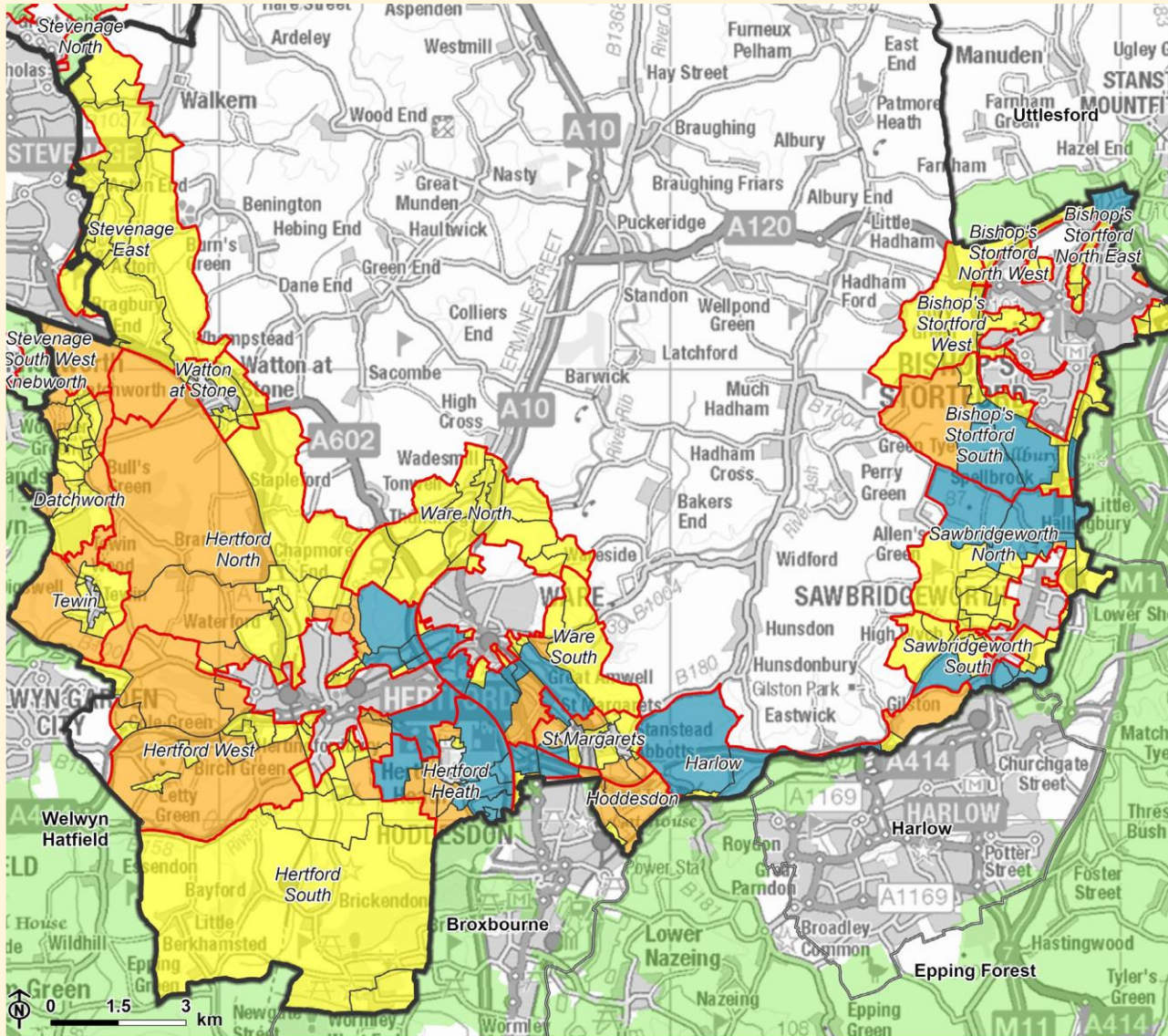


Purpose A: checking sprawl of large built-up area

- Land near to large built-up areas
- Less urbanising influence = stronger contribution
- Beyond well-defined boundaries = stronger contribution
- Smaller areas with more urban influence/containment = weaker
- Further from towns = potential for some development that wouldn't be associated
- Expansion of large built-up area into weak contribution area would be significant sprawl



Assessment findings

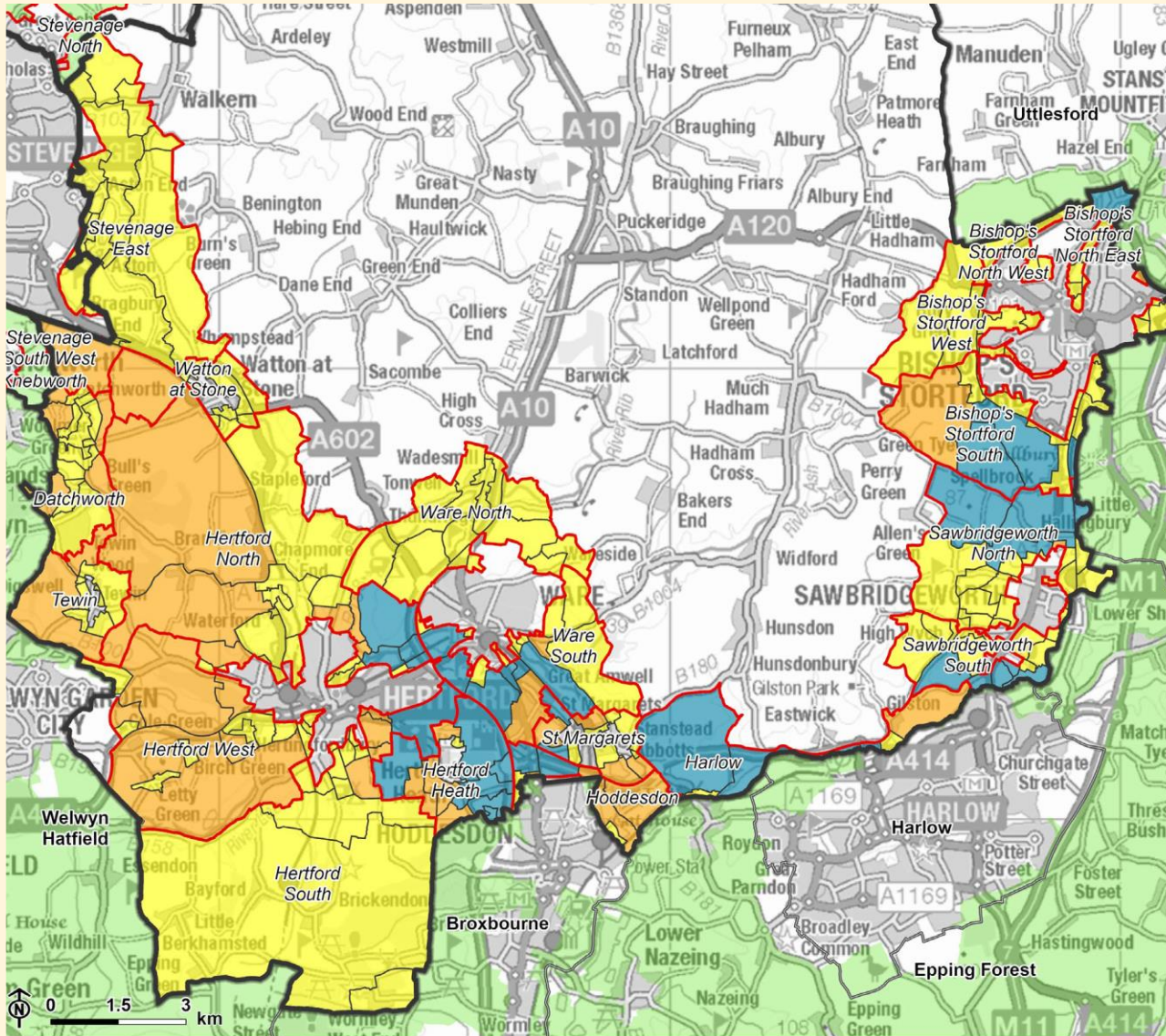


Purpose B: preventing merger of towns

- Does the parcel lie in a gap between neighbouring towns?
- Is there urbanising development in it?
- Does the parcel form a substantial part of the gap?
- Would development result in a significant loss of visual separation?
- Role of intervening development



Assessment findings

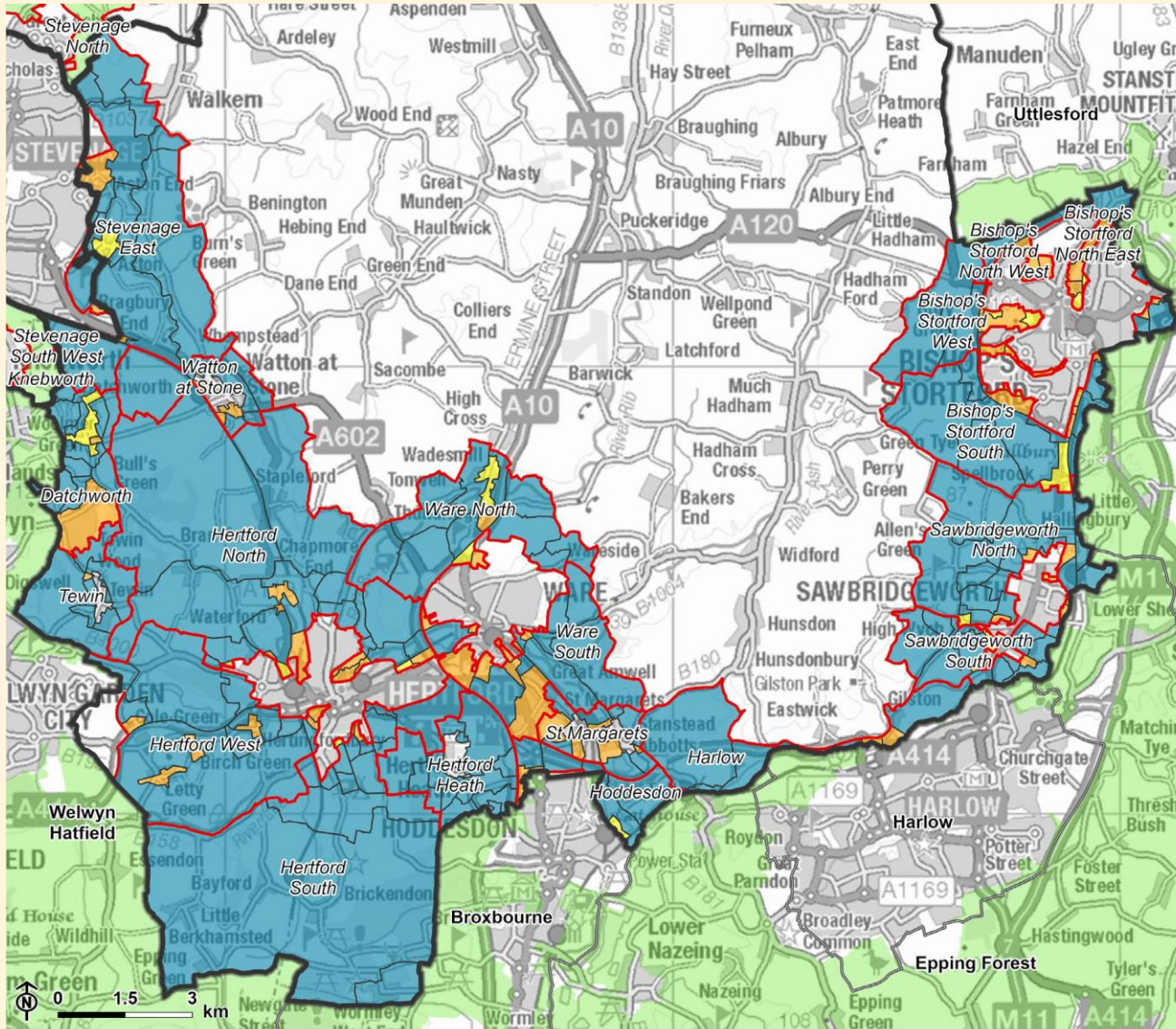


Purpose B: preventing merger of towns

- Relatively narrow gaps in eastern area = strong contribution
- Moderate contribution where peripheral to gap and urbanising influence
- Moderate contribution between Stevenage, WGC and Hertford - potential for some degree of development
- Weaker contribution where urban containment or where no neighbouring towns



Assessment findings

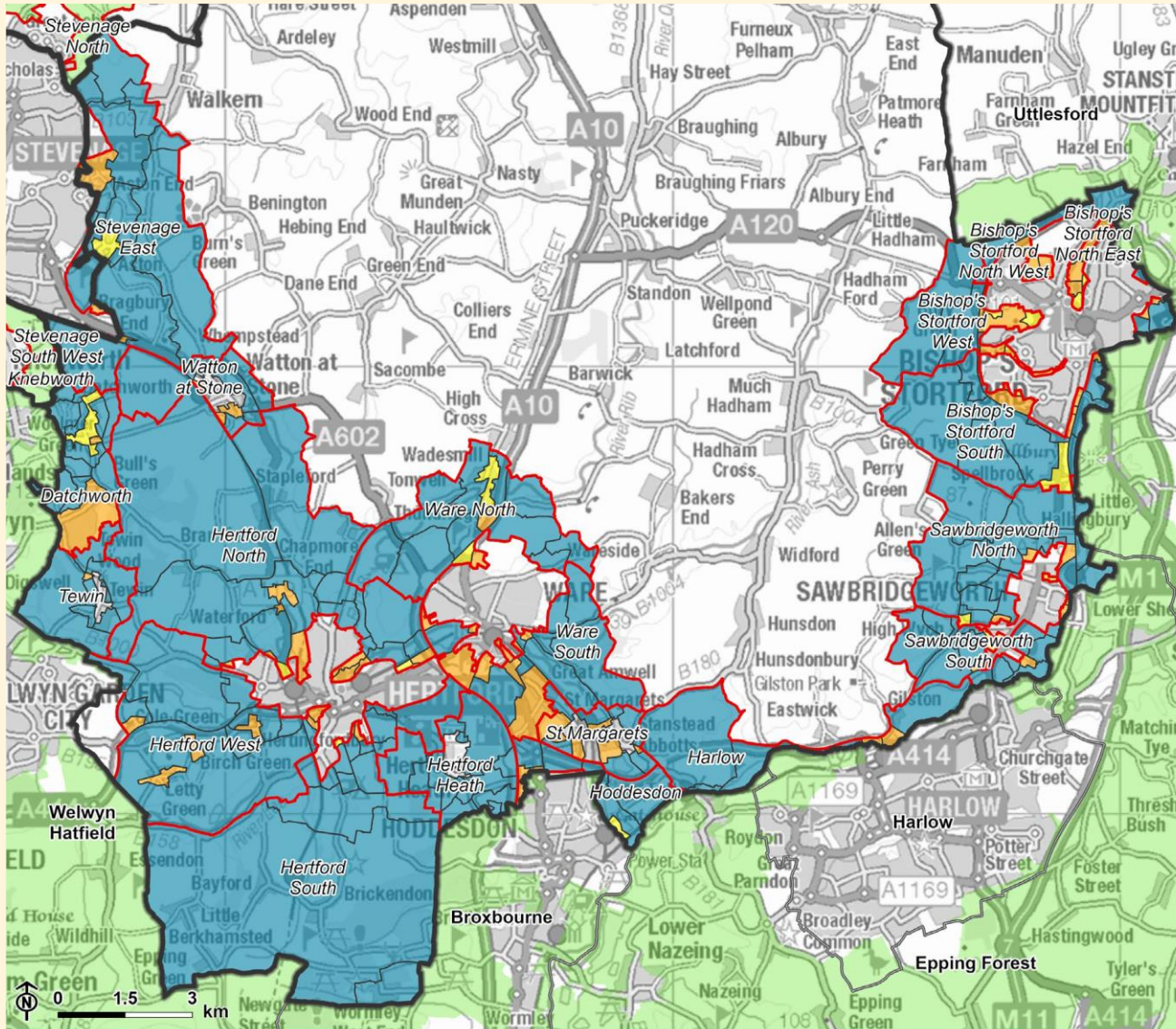


Purpose C: safeguarding the countryside from encroachment

- Is the parcel in the countryside?
- Is there urbanising development in it?
- Are there other urbanising influences?
- Would development increase urbanising influences in adjacent Green Belt land?



Assessment findings

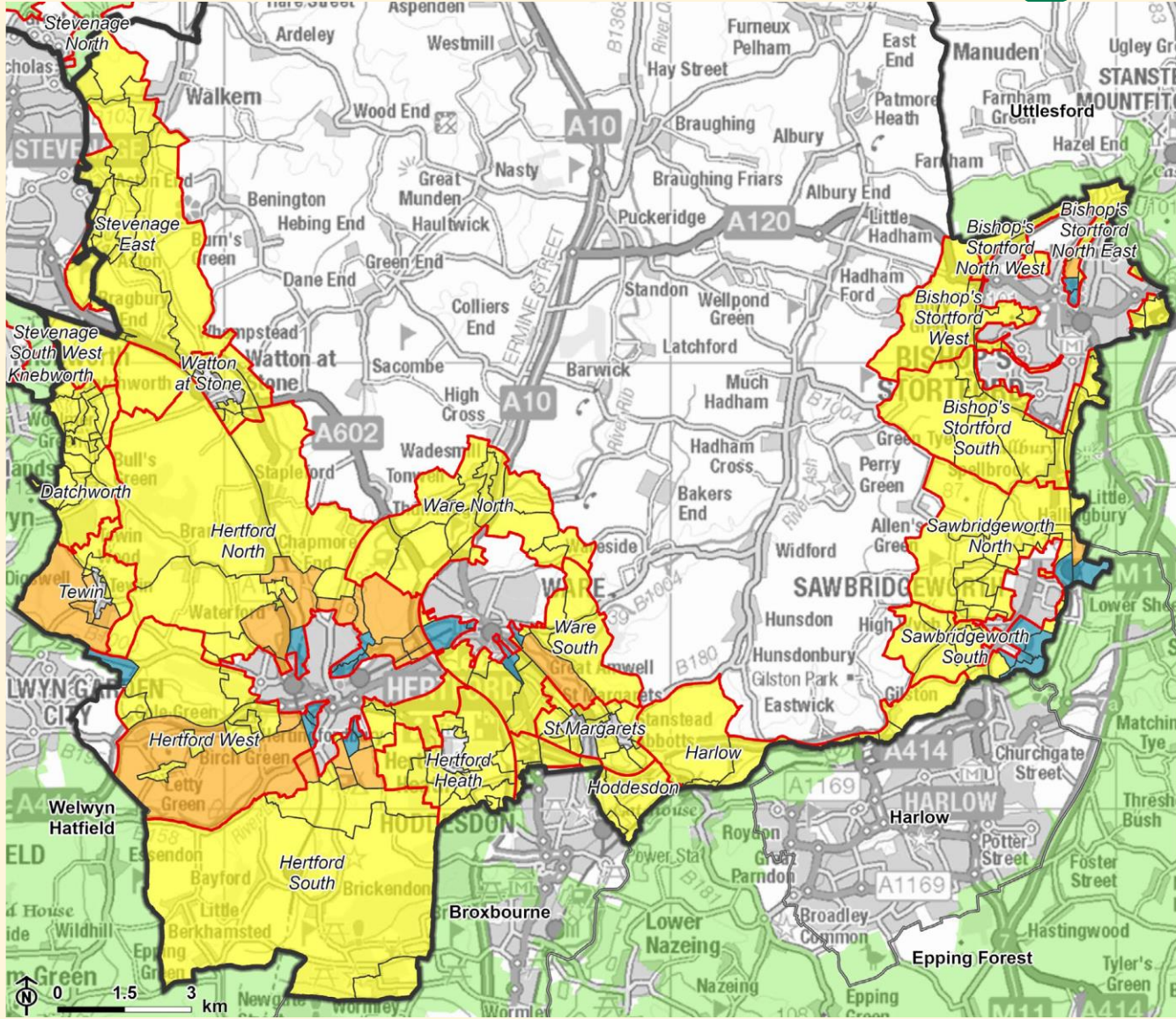


Purpose C: safeguarding the countryside from encroachment

- Most land makes a strong contribution
- Weaker contribution requires some urbanising influence and/or washed over development and some degree of containment



Assessment findings

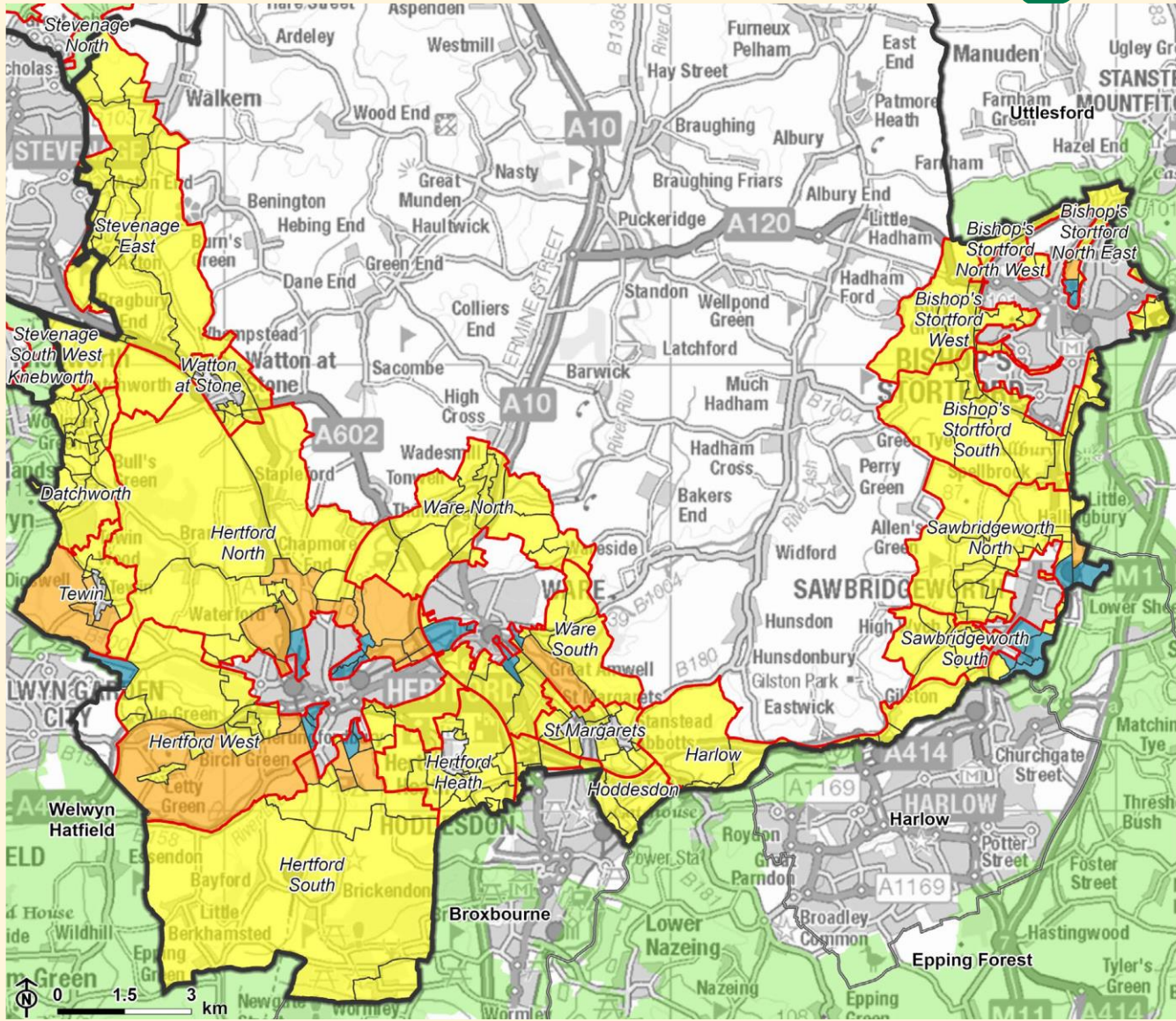


Purpose D: protecting setting and special character of historic towns

- Does the parcel form part of the setting of a historic town?
- Is there urbanising development in it?
- Does it contribute to special character?



Assessment findings

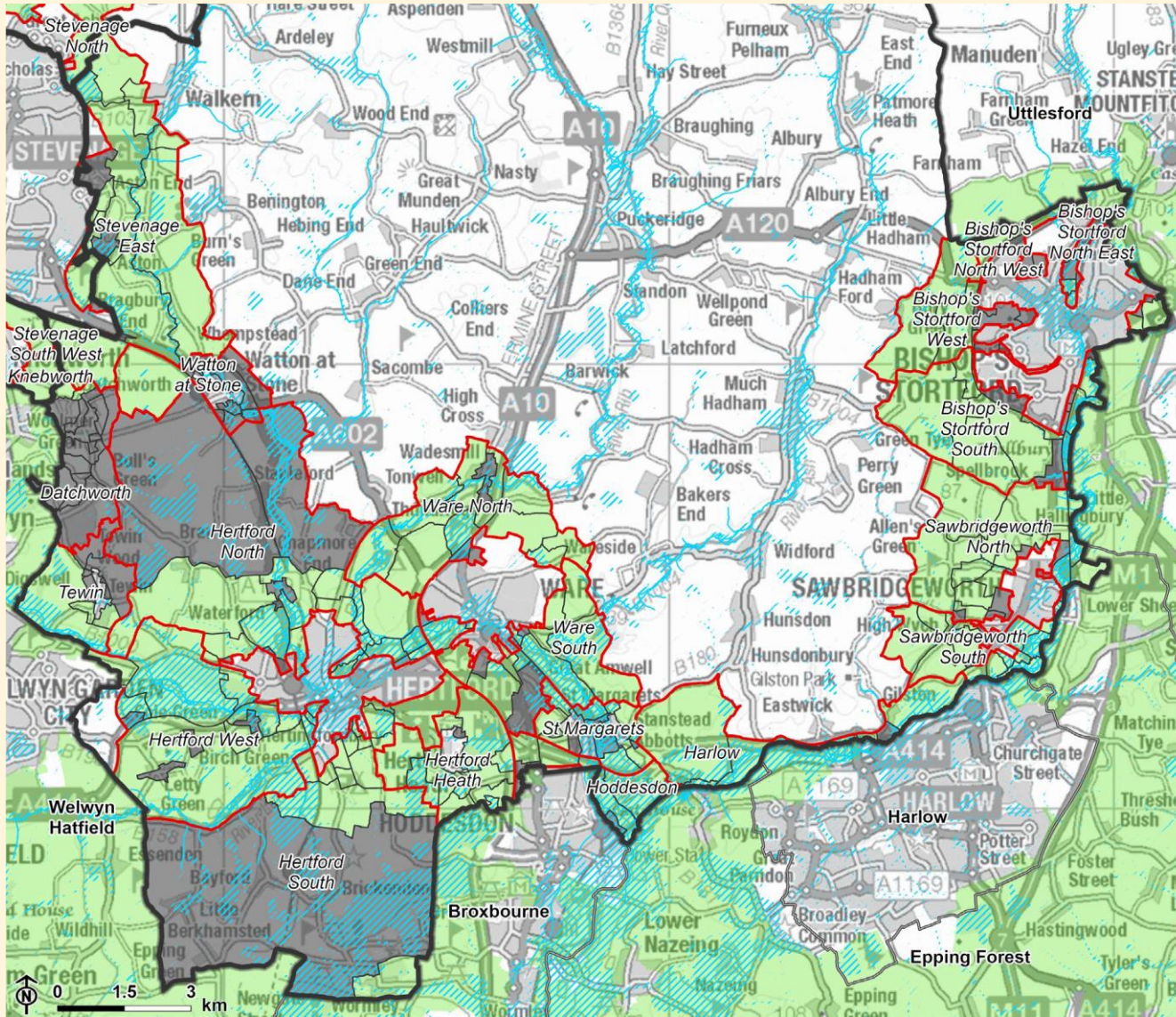


Purpose D: protecting setting and special character of historic towns

- Has to be a town
- Not about historic origins but about Green Belt land contributing to special character
- Modern development often isolates historic core from landscape setting
- Relatively small areas make a strong contribution...
- ... where associated with significant physical/heritage features (e.g. river corridor reaching historic core)



Assessment findings

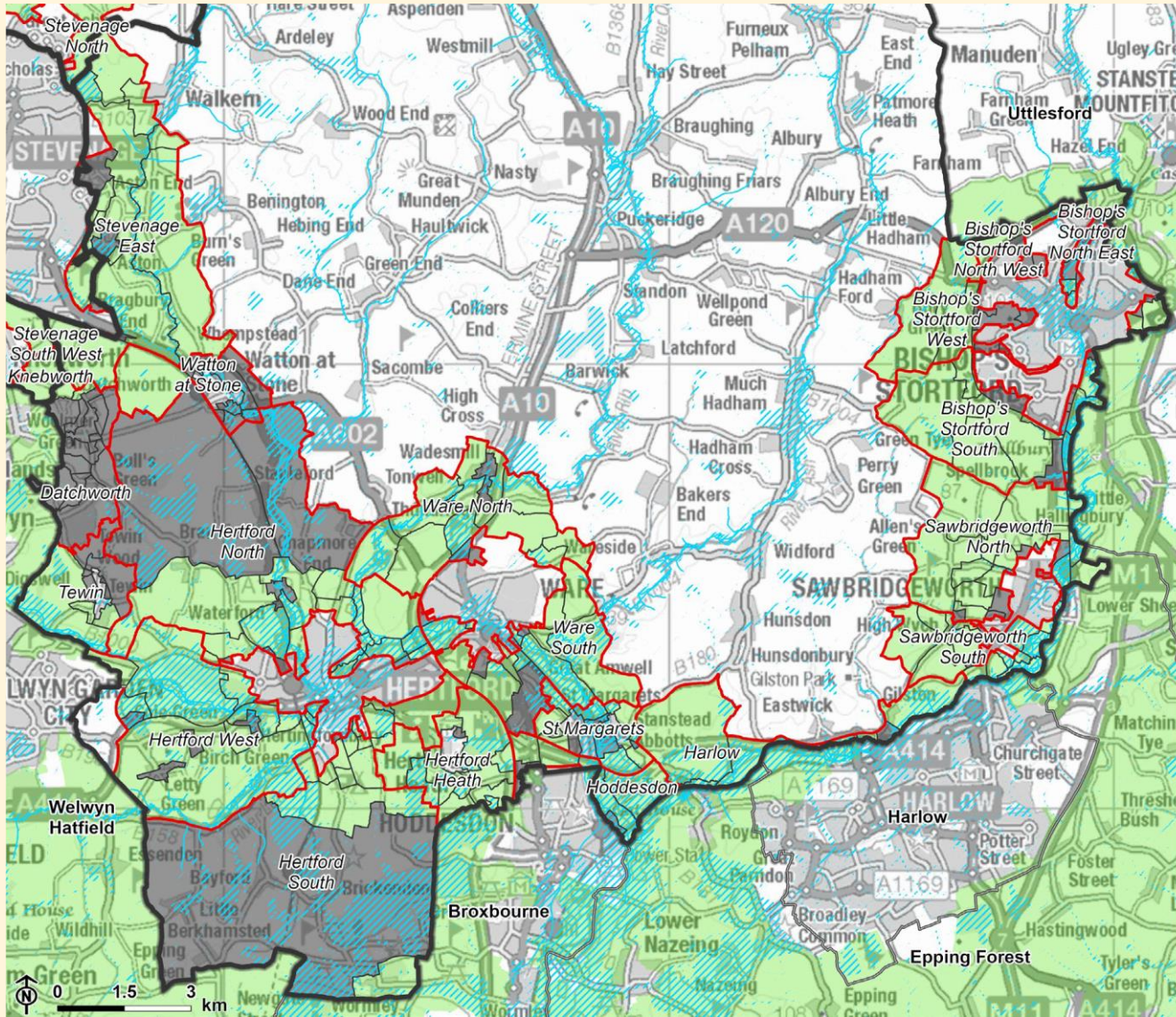


Grey belt:

- Two large areas where only strong contribution is to preventing encroachment on the countryside (Purpose C)
- Closer to large built-up areas = only smaller areas: urbanising influence, containment
- Provisional, subject to considering potential impact on footnote 7 areas/assets
- Grey belt is still Green Belt!
- Sustainability is key...



Assessment findings

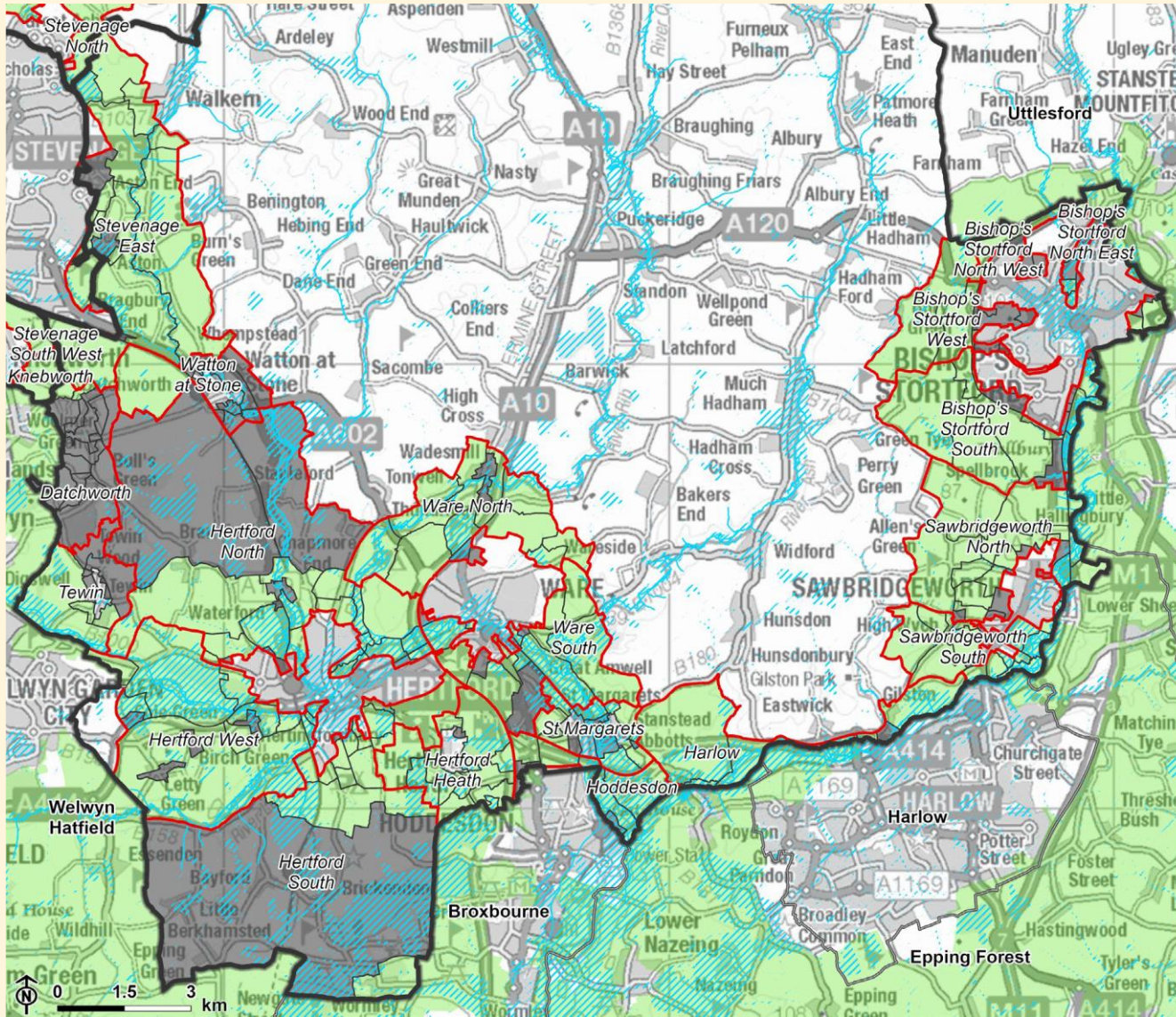


Fundamental undermining:

- Development is still inappropriate if it would “fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan”
- Purpose C is still relevant
- High bar
- Merger of towns = most likely scenario: impact on Purposes A, B, C and D
- ... or loss of containment at Green Belt edge



Assessment findings



A10 corridor:

- Gap between Hertford and Ware
- Narrow Green Belt buffer east of Ware
- Fragile separation from Hoddesdon (Ware and Hertford)

M11 corridor:

- Stansted – Bishop's Stortford
- Sawbridgeworth – Harlow – Gilston

Need to consider specific proposals and cumulative impact



Grey belt myths



The following are 'myths':

- Green Belt is to protect areas of attractive landscape, biodiversity, public access/recreation
- Grey belt is car parks and disused petrol stations
- Grey belt is not Green Belt
- Grey belt land is suitable for development

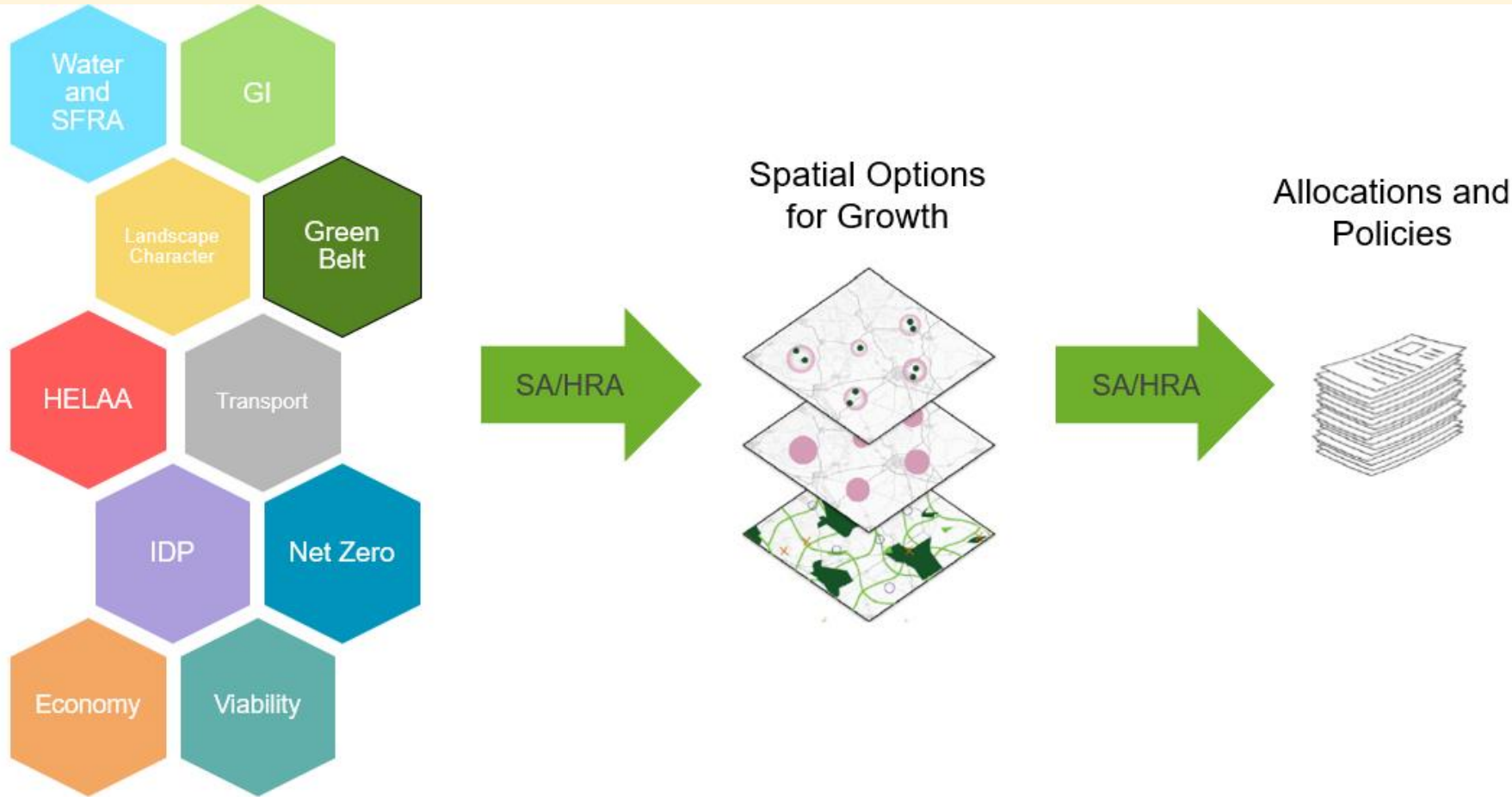
Starmer says: "Labour supports brownfield first policies. But we must be honest we cannot build the homes Britain needs without also releasing some land currently classed as green belt."

"We'll prioritise ugly, disused grey belt land, and set tough new conditions for releasing that land."

Explaining its reason for creating a grey belt, the party said: "We don't think it is right that wastelands and old car parks located on the green belt are given the same protections in national policy as rolling hills and nature spots in the green belt."



Part of the evidence...



The Green Belt Assessment is one part of the evidence base to help in defining strategy options.

