



LAND NORTH EAST OF HARPENDEN

GREEN BELT REVIEW – TECHNICAL NOTE

BMD.24.0039.RP.GBR.002
DATE: FEBRUARY 2026

DOCUMENT HISTORY

Project Number: 24.0039		Document Reference: BMD.24.0039.RP.TN.002			
Revision	Purpose of Issue	Originated	Reviewed	Approved	Date
-	DRAFT FOR INFORMATION	JJ	RW	RW	12.09.2024
-	FINAL DRAFT - PLANNING	JJ	RW	RW	16.07.2025
-	FINAL - PLANNING	JJ	RW	RW	22.08.2025
-	FINAL – PLANNING (SITE REDLINE AMENDED)	JJ	RW	RW	25.02.2026

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1. INTRODUCTION

- 1.1.1 Following a request from Crest Nicholson Partnerships & Strategic Land, Bradley Murphy Design Ltd. (BMD) has undertaken a high-level Green Belt Review in relation to 'Land North East of Harpenden between Lower Luton Road, Bowers Heath Lane and Common Lane', in Hertfordshire (as illustrated on **Figure 8.1: Site Location and Study Area** at **Appendix 8.4** of the Environment Statement). The area of study (referred to as the 'Site') is focused on circa 32.9370 hectares of land, all within single ownership, along with the surrounding Green Belt context.
- 1.1.2 The Site is located on the north eastern settlement edge of Harpenden, with clearly defined edges. The urban edge of Harpenden lies adjacent to the south and west of the Site, together with Lower Luton Road (B653). The Site comprises Greenacres Equestrian Centre, an equestrian facility featuring stables, outbuildings, ménages and pastoral land use for horse grazing (as illustrated on **Figure 8.1: Site Location and Study Area** at **Appendix 8.4** of the Environment Statement).
- 1.1.3 This Green Belt Review was prepared by Senior Associate Landscape Architect, Joanne John CMLI, from BMD (a chartered landscape architect) and was undertaken to both inform the iterative design process and highlighting any landscape mitigation that could support Green Belt release.
- 1.1.4 The Site lies within an area of Green Belt listed in various references as the:
- London Area Green Belt (magic.defra.gov.uk)
 - Metropolitan Green Belt
- 1.1.5 For the purposes of this technical note, any reference to the Green Belt will be made in relation to the Metropolitan Green Belt, in the district of St Albans.
- 1.1.6 BMD have reviewed the Councils' existing Green Belt evidence base documents and undertaken our own review with consideration of the development Site and the potential for release from the Green Belt - to highlight any landscape mitigation that may support Green Belt release.
- 1.1.7 This BMD Review considers the Site as a whole, in terms of its potential to be considered as Grey Belt, its potential capacity to accommodate a sustainable landscape-led development, consideration of the Site's contribution to the purposes of the Green Belt, along with consideration of the potential for harm to the strength of the wider Green Belt (should the Site be removed from the Green Belt).

2. GREEN BELT POLICY CONTEXT

National Green Belt Policy

- 2.1.1 The National Planning Policy Framework (NPPF¹) (updated February 2025) states that the Government attaches great importance to Green Belts, with the fundamental aim being to prevent urban sprawl by keeping land permanently open and to identify the essential characteristics of Green Belts as being their ‘openness’ and ‘permanence’. Principles of the Green Belt are set out in NPPF, Section 13: paragraphs 142-160.
- 2.1.2 It sets out the five key purposes which the Green Belt serves:
- To check the unrestricted sprawl of large built-up areas
 - To prevent neighbouring towns merging into one another
 - To assist in safeguarding the countryside from encroachment
 - To preserve the setting and special character of historic towns
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- 2.1.3 In terms of plan-making, the NPPF requires local planning authorities (with Green Belts in their area) to establish boundaries in their Local Plans. It is acknowledged that the general extent of Green Belts across the country is already established. Once in place these should only be altered in exceptional circumstances, which are fully evidenced and justified, through the preparation or updates of plans.
- 2.1.4 Paragraph 146 of the NPPF defines exceptional circumstances as (and not limited to): A Local Planning Authority not meeting housing or other development need – requiring the Local Planning Authority to review its Green Belt and make alterations (unless doing so would fundamentally undermine the Purposes of the remaining Green Belt – when considered together)
- 2.1.5 Paragraph 148 of the NPPF 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. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas*

¹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary”.

- 2.1.6 Paragraph 151 of the NPPF states that *“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. Where Green Belt land is released for development through plan preparation or review, the ‘Golden Rules’ in paragraph 156 below should apply”.*
- 2.1.7 Paragraph 156 of the NPPF sets out the Government’s **‘Golden Rules’** in relation to Green Belt, stating *“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:*
- a. affordable housing...;*
 - b. necessary improvements to local or national infrastructure; and*
 - c. 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”.*
- 2.1.8 Paragraph 158 of the NPPF states *“a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”.*
- 2.1.9 Paragraph 159 of the NPPF sets requirements for green space improvements, as part of the ‘Golden Rules’ - where there are no local standards, national standards will be default, including Natural England standards on accessible green space, urban greening factor / UGF and Green Flag criteria – plus positive contribution to development’s landscape setting and Local Nature Recovery Strategies.

Local Green Belt Policy

- 2.1.10 The Site is located within the administrative area, City and District of St Albans in the parish of Harpenden, and is subject to the following existing local policy:
- City and District of St Albans District Local Plan Review 1994 (Adopted 30 November 1994) Saved and Deleted Policies Version (July 2020)
 - Harpenden Neighbourhood Plan 2018 – 2033 (Final Version for Referendum November 2018)
 - Wheathampstead Neighbourhood Plan 2020-2025 (2023)

City and District of St Albans District Local Plan Review 1994 (Adopted 30 November 1994) Saved and Deleted Policies Version (July 2020)

- 2.1.11 The Site is located wholly within the jurisdiction of St Albans City and District Council (SACDC). Over 81% of the district comprises land in the Green Belt. The original 1985 District Local Plan placed all the District within the Metropolitan Green Belt, except for the main built-up areas, i.e. the towns and large villages. The remaining small villages within the district are all washed over by the Green Belt. There are no non-urban areas within the district without a Green Belt designation. Green Belt boundaries in the district have not altered since the adoption of the District Local Plan Review in 1994.
- 2.1.12 The new emerging Local Plan for St Albans City and District Council (SACDC) was recently withdrawn - following it being found unsound, due to failure of the duty to cooperate. The Development Plan therefore, comprises the saved policies of the 1994 St Albans District Local Plan.
- 2.1.13 The Council is developing a new Local Plan. The Regulation 19 version is the latest version and weight can be given to it due to the advanced stage in preparation (i.e. it is progressing towards Stage 2 Hearing in Autumn 2025). The new Local Development Scheme was updated in February 2024, with pre submission timetabled for Oct – Dec 2024, submission March 2025, Examination March 2025 – Feb 2026 and adoption scheduled for March 2026.
- 2.1.14 The Site is located on the north eastern settlement edge of Harpenden, within countryside and land designated Green Belt, outside the defined settlement boundary (as shown in **Figure A** below). The Local Plan policies of relevance to Green Belt are summarised below.



Figure A: Extract from Planning Constraints Map for St Albans including Harpenden²

- 2.1.15 **Policy 1: Metropolitan Green Belt** – the whole of the St Albans District lies within the Metropolitan Green Belt, except for the towns and settlements listed in Policy 2. Within the Green Belt, permission will not be given for development - except for development in Green Belt settlements (listed in Policy 2) or in very special circumstances.
- 2.1.16 **Policy 2: Settlement Strategy** – The policy highlights how Harpenden is classified as a Town and excluded from the Green Belt and states “*development will generally be concentrated in towns, but proposals should not detract from their essential character*”. The Site is located within Green Belt directly adjacent to the north eastern settlement edge of Harpenden (as shown in **Figure B** below).
- 2.1.17 **Policy 8: Affordable Housing in the Metropolitan Green Belt** – The policy states “*planning permission for affordable housing for local needs in the Metropolitan Green Belt will be granted when the following criteria are complied with – evidence must be produced to show that the village*

² <https://gis.stalbans.gov.uk/webmap9/map.aspx?mapname=stalbens>

Figure B: Settlement Strategy - Extract from City and District of St Albans District Local Plan



February 2026

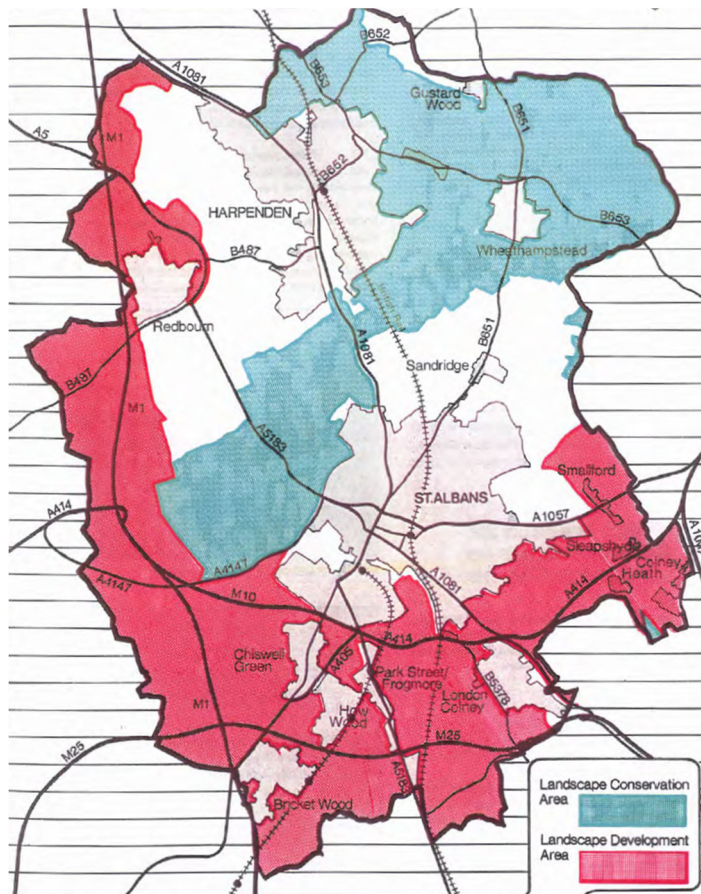


Figure C: Landscape Conservation Areas - Extract from City and District of St Albans District Local Plan Review 1994

Harpenden Neighbourhood Plan 2018-2033 (2019)

- 2.1.19 The town of Harpenden is, in the main, surrounded by Green Belt. The land outside the defined settlement boundary of Harpenden, including the Site, is within the Green Belt.
- 2.1.20 **Policy SS1: The Spatial Strategy** - The Harpenden Neighbourhood Plan spatial strategy considers – the built up area of Harpenden is the priority for new development in the Harpenden Neighbourhood Plan Area (as shown in **Figure D** below). It states “*in the event that St Albans City and District Council releases land in the Green Belt adjacent to the current Built up Area Boundary of Harpenden for residential development in a future Local Plan, that land is considered by this Policy to be within the Built up Area Boundary of Harpenden*”. The policy highlights planning applications for new development proposals outside the built up area boundary and

within Green Belt must demonstrate Very Special Circumstances and why the proposal cannot be located within the Built up Area Boundary of Harpenden.

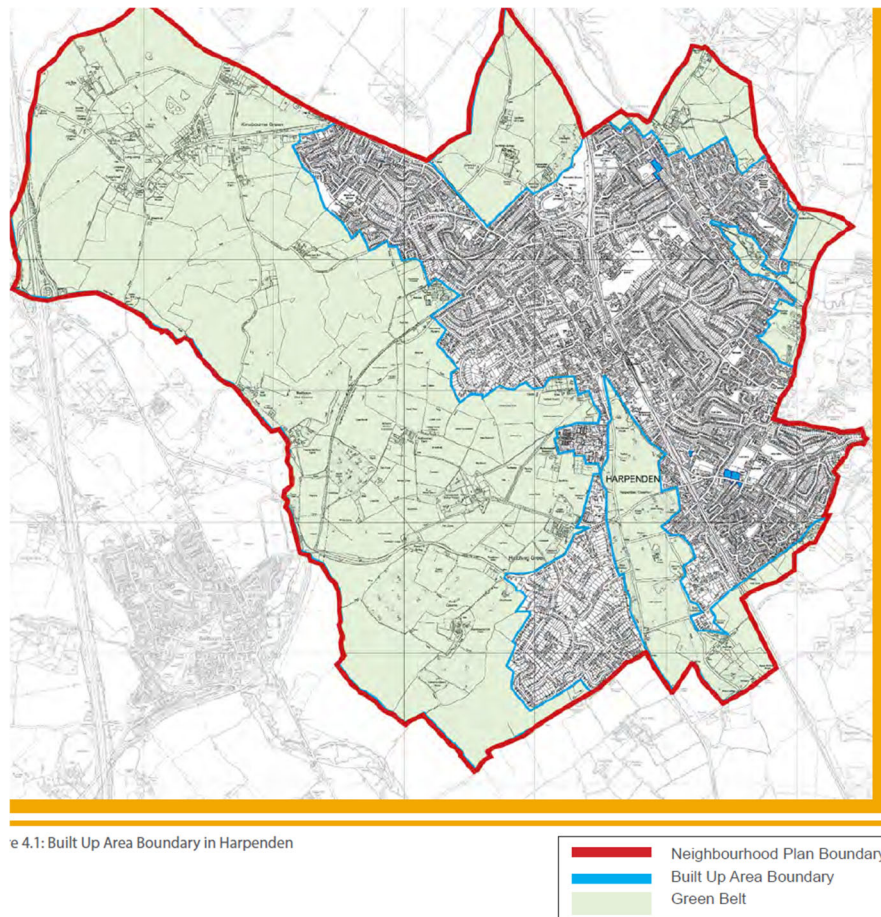


Figure D: Built up Area Boundary in Harpenden - Extract from Harpenden Neighbourhood Plan

Wheathampstead Neighbourhood Plan 2020-2025 (2023)

- 2.1.21 Wheathampstead Neighbourhood Plan forms part of the Development Plan for SACDC. The northeastern part of the Site is located with the Wheathampstead plan boundary. The following policies are of relevance to the Site and Proposed Development.
- 2.1.22 **Policy W1: Location of Development** - The northern eastern part of the Site is located within land designated Green Belt and outside the defined settlement boundaries, in the Wheathampstead Neighbourhood Plan. This policy states, “*development in the Neighbourhood area will be focused within the settlement boundary*” and “*inappropriate development which is, by definition, harmful to the Green Belt will not be approved unless the applicant is able to demonstrate the existence of very special circumstances*”.
- 2.1.23 Development proposals outside the settlement boundaries will not be supported unless:
- *the development preserves or enhances the character or appearance of the area;*

- *it is in accordance with the St Albans District Local Plan Review and National Planning Policy Framework in respect of appropriate uses in the Green Belt;*
- *Inappropriate development which is, by definition, harmful to the Green Belt will not be approved unless the applicant is able to demonstrate the existence of very special circumstances.*

2.1.24 **Policy W3: Minimising the Environmental Impact of Development** - The policy states that *“development proposals should respect, maintain and, where practicable, enhance, restore or contribute to the landscape character of Wheathampstead Parish and its natural and manmade features, as described in the South Hertfordshire Landscape Character Assessment”.*

Emerging Green Belt Policy

Draft Local Plan 2041 Regulation 19 Publication (SADC September 2024)

2.1.25 St Albans City & District Council is currently in the process of producing the new Local Plan. The latest version is the Draft Local Plan Regulation 19 Publication, published in September 2024. The following emerging policies are relevant to landscape and visual matters in relation to the Site and its surrounding context.

2.1.26 **Policy LG1: Broad Locations** - The Site is located within the allocated site B2 – North East Harpenden, proposed for primarily residential development. The policy states that development proposals must *“normally retain significant healthy trees and other important landscape features... positively relate and integrate the development to the surrounding buildings and landscapes, and be informed by a comprehensive Landscape and Visual Impact Assessment...[to] ensure that land use, landscaping and form have regard to the topography of the site and identified landscape impacts.”*

2.1.27 **Policy LG5: Green Belt** - The area to the north of the track on Site remains designated as Green Belt, within the emerging Local Plan, with the rest of the Site removed from the Green Belt as part of a Broad Location site. Policy LG5 states “proposals in the Green Belt will be assessed in accordance with national policy. Where proposals are consistent with Green Belt purposes and objectives the Council will support in principle:

- a) Opportunities that arise through development to proactively manage Green Belt land to:
 - i. Protect and create attractive landscapes and countryside;
 - ii. Promote healthy ecosystem services;
 - iii. Support productive and sustainable farming and forestry; and
 - iv. Provide space for local and wider recreational needs.

- b) Infrastructure provision identified in the Local Plan that is essential to ensure sustainable development across the District and beyond, that demonstrates ‘very special circumstances’, namely:
 - i. New state schools;
 - ii. The creation of new transport infrastructure; and
 - iii. Small scale, largely open forms of infrastructure development such as outdoor sport and recreation facilities and uses (including detached playing fields for schools), drainage areas and utilities installations.

2.1.28 **Strategic Policy SP1: A Spatial Strategy for St Albans District** – Harpenden is identified as a ‘town’ and Tier 2 settlement, where the policy states *“locating most growth generally within and adjacent to the larger and most sustainable urban centres that are Tier 1 - St Albans and Hemel Hempstead; Tier 2 – Harpenden, and Tier 3 - London Colney”*. The Site is identified as part of a Broad Location, removed from the Green Belt, which are defined by this policy *“as large urban extensions of 250 or more homes or strategic scale employment. The most significant Broad Locations are the four comprising Hemel Garden Communities which is planned to the east and north of Hemel Hempstead on Green Belt land, and will provide a large contribution to 14 meeting growth requirements”*. The emerging Local Plan illustrates the Broad Location Sites within the District, with the Site referred to as no. 6 North East Harpenden (as shown in **Figure E** below).



Figure E: Extract from Draft Local Plan 2041 Regulation 19 Publication (SADC September 2024) – Key Diagram.

- 2.1.29 **Strategic Policy SP3: Land and the Green Belt** – The Council attaches great importance to the Metropolitan Green Belt, which will be protected from inappropriate development. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green Belt are its openness and permanence. As noted above, the Draft Local Plan Regulation 19 Publication, published in September 2024, has revised the Green Belt boundaries as part of the emerging Local Plan, as illustrated on the Policies Map (see **Figure E** above) and removed part of the Site from the Green Belt and allocated it as a **Broad Locations (Policy LG1)** for development.

St Albans Green Belt Review

St Albans City and District Council – Stage 2 Green Belt Review (Final Report June 2023)

- 2.1.30 Arup was appointed, by St Albans City & District Council (SACDC), to prepare a Stage 2 Green Belt Review (GBR) - intended to provide a robust local review of the District's Green Belt and countryside, including the washed over villages, to provide an evidence base to help inform work carried out as part of the emerging Local Plan.
- 2.1.31 The purpose of a GBR is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the NPPF.
- 2.1.32 SACDC previously submitted a replacement Local Plan in March 2019, although this was subsequently withdrawn in November 2020. The Council submitted a Green Belt Review Purpose Assessment³ (Stage 1) and Green Belt Review Sites and Boundaries Study⁴ (Stage 2) as part of the evidence base for the Local Plan. However, the Green Belt evidence, in particular the Stage 2 GBR was questioned by the Inspectors. SACDC therefore subsequently decided to prepare a new Stage 2 GBR, (i.e. this study) to address the concerns raised.
- 2.1.33 The previous Stage 1 Green Belt Review Purpose Assessment (published November 2013) concluded that Strategic Green Belt Parcel GB40 (containing the Site and a large proportion of land to the north and east of Harpenden) makes a significant contribution towards 4 of the 5 Green Belt purposes, stating *"it checks sprawl from Luton and Dunstable, safeguards the countryside, preserves setting and maintains the existing settlement pattern"*.
- 2.1.34 The Stage 1 GBR then further assesses strategic sub-areas, of which the Site is located within **SA-S6 - Enclosed land at northeast Harpenden along Lower Luton Road, and extending to the vicinity of Whittings Close (GB40)**, which is relatively small in comparison to the strategic parcel as a whole. The GBR describes the sub-area by stating SA-S6:

³ SKM (2013) Green Belt Review Purposes Assessment for Dacorum, St Albans and Welwyn Hatfield, Final Report

⁴ SKM (2014) Green Belt Review Sites and Boundaries Study, Prepared for St Albans City and District Only

“...follows the angular urban edge which increases localised levels of enclosure and urban influence. In addition, existing field patterns and boundary planting create a greater sense of local landscape enclosure. This creates a valuable part of the countryside, but also provides partially screened views from the wider countryside and surroundings. At the strategic level, a reduction in the size of the parcel would not significantly compromise the overall role of the Green Belt or compromise the separation of settlements. Assessed in isolation the sub-area makes a limited or no contribution towards checking sprawl, preventing merging, preserving setting and maintaining local gaps”.

In the Stage 2 GBR (2023) the Site formed part of a wider area, within sub-area **SA-24 North East Harpenden** (as shown in **Figure F** below). The accompanying Annex report⁵ provides a detailed assessment against the five purposes of the Green Belt, which is summarised in the table below. It concluded *“The sub-area meets the purposes strongly overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area performs weakly against purposes 2 and 4 and performs moderately against purpose 3”.*

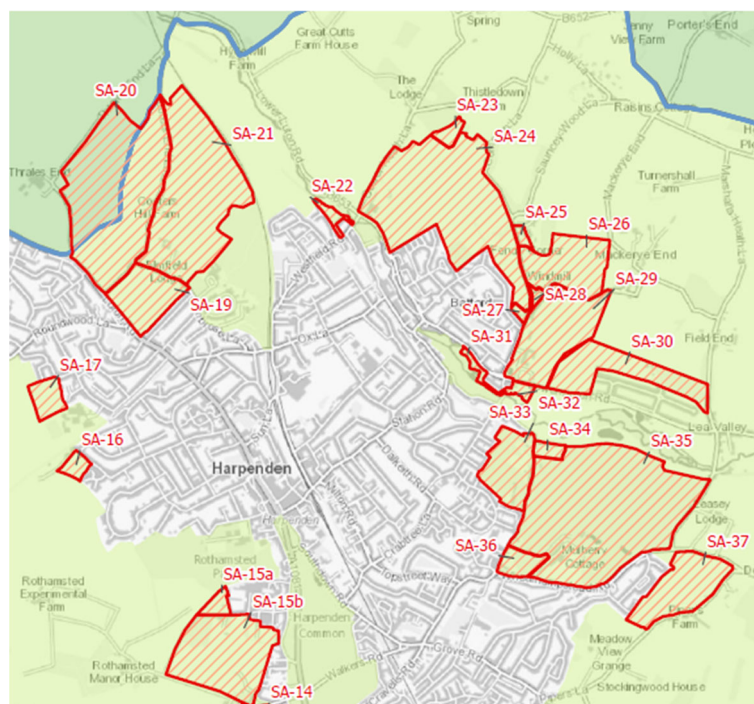


Figure F: Harpenden Green Belt Sub-Areas for Assessment - Extract from St Albans City and District Council – Green Belt Review, Stage 2, 2023

- 2.1.35 In relation to SA-24 and its boundaries, the detailed assessment states *“the sub-area is bounded by an unclassified private road, a mature tree line and Common Lane to the north, by Common Lane to the east, by an intermittent tree line to the south, by the regular backs of residential properties and gardens along Milford Hill, Whittings Close, Pickford Hill, Porters Hill, Noke Shot,*

⁵ ARUP (2023) St Albans Stage 2 Green Belt Review, Annex Report

Saxon Close, Dane Close, Turners Close, Northfield Road and St Martins Close and Lower Luton Road (B653) to the south and by Bower Heath Lane (B652) to the west”.

- 2.1.36 The detailed assessment concluded and provided a recommendation in relation to SA-24 stating *“the sub-area performs strongly against NPPF purposes but the south-east part of the subarea makes a less important contribution to the wider Green Belt”*. It is worth noting the south eastern part referred in SA-24 does not form part of the Site.

Sub Area – SA-24 – North East Harpenden		
Strategic Land Parcel 40		
1.	To check the unrestricted sprawl of large built-up areas (a) Land parcel is located at the edge of a discrete built-up area (b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary.	(a) <i>The sub-area adjoins the large built-up area of Harpenden, with physical connections on its the south-west boundary.</i> (b) <i>The sub-area is connected to a large built-up area of Harpenden. There are no prominent outer boundary features for the settlement within a reasonable distance of the sub-area which are likely to prevent outward sprawl. Development within the sub-area would lead to irregular sprawl of the large built-up area. The sub-area has predominantly recognisable and likely to be permanent inner boundaries, which provide an additional barrier to sprawl.</i>
2.	To prevent neighbouring towns from merging	<i>The sub-area forms the less essential part of the gap between Harpenden and Luton. It is judged that the gap is of sufficient scale, that the removal of the sub-area would not result in physical or perceptual merging between neighbouring built-up areas.</i>
3.	Assist in safeguarding the countryside from encroachment	<i>Approximately 2% of the sub-area is covered by built form. The sub-area comprises arable fields, paddocks and meadows as well as an equestrian centre in the west of the sub-area as well as a park, playground and allotments in the south-east of the sub-area. There are some medium to long views to the north-east creating a strong perceptual and physical relationship with the wider Green Belt. The south-eastern part of the sub-area, although characterised by rural land uses, is more enclosed due to mature tree lines separating fields, and therefore has a less perceptual link to the open countryside. There are also some views onto Harpenden which introduce urbanising influences to the west of the sub-area.</i>

4.	To preserve the setting and special character of historic towns	<i>The sub-area does not abut a historic place, however there are some limited views onto the Harpenden Conservation Area. Overall, the sub-area has a weak relationship with the historic place.</i>
5.	To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	<i>NA – therefore not assessed</i>

**St Albans City and District Council – Green Belt Review Sites & Boundaries Study
(February 2014 - Superseded)**

2.1.37 The SACDC Green Belt Review Sites and Boundaries Study (February 2014) is identified as ‘superseded’, on the SACDC planning policy website page Green Belt documents⁶, however the findings of this report provide useful guidance in relation to the Site. The Site formed part of a wider area, within sub-area S6: North East Harpenden. The GBR highlights how a landscape appraisal of the sub-area has been undertaken, the findings of which are summarised below:

- **“Landform:** *The landform rises from the Lea Valley to the edge of the plateau in the north-east. The land rises from approximately +90m Above Ordnance Datum (AOD) to the west, to approximately +130m AOD on the edge of the plateau. The rising landform is a notable feature, which combined with the land-use and cover gives rise to an open landscape.*
- **Land cover and Land Use:** *The sub-area primarily comprises agricultural land uses, predominantly pasture, in a large and open field pattern. Fields are bounded by a mix of hedgerows (sometimes fragmented or overgrown) and fences. Agricultural land quality is Grade 3. There are occasional small areas of woodland and woodland belts on the north-east edge of the sub-area, e.g. alongside Common Lane. The sub-area also includes several residential properties alongside Bower Heath Road (B652), including Greenacres Equestrian Centre at the junction with Lower Luton Road (B653). Low density, detached housing also lies to the east of Common Lane (Sauncey Wood). The edges of Harpenden lie to the south and east. Key ecological features comprise the remnant hedgerows and hedgerow trees, together with the areas of woodland on the edge of the sub-area. There are no ecological designations within the sub-area.*
- **Built and cultural heritage aspects:** *The key notable cultural heritage feature is the remnant field pattern. There are no known designated heritage assets within the sub-area.*
- **Levels of enclosure:** *The nature of the landform and land cover gives rise to a visually open landscape on the upper slopes where there are clear views over the surrounding landscape. As the land falls towards the Lea Valley the landform gives rise to a greater sense of*

⁶ <https://www.stalbans.gov.uk/green-belt-documents>

enclosure. The existing settlement edges of Harpenden have a strong and quite abrupt form, particularly to the south, where the settlement pattern cuts across the landform.

- **Visual attributes:** *The most notable visual attribute is the open views over the surrounding landscape that can be obtained from the edge of the plateau. There are also clear views towards the sub-area from the opposite side of the valley (e.g. from Cooters End Lane). The combination of landform and pattern means that visual sensitivities are likely to be associated with both adjacent and more distant receptors. Key local visual receptors are likely to include adjacent residential areas, roads and public rights of way. The woodland creates visual enclosure to the north-east/east, but there are open views across the valley from locations to the west including residents, road users, a railway line and a section of the Chiltern Way long distance path.*
 - **Landscape sensitivity:** *This strategic sub-area lies on the northern edge of Harpenden. The surrounding urban edges are strong and clearly defined by the adjacent development. Much of landscape has been modified and field boundaries have been lost.*
 - *The combination of the landform and settlement form influences the potential to accommodate new development. The lower valley side comprises a more enclosed part of the landscape, while the plateau edge is more open. The existing settlement edge forms a conspicuous element in places (e.g. Common Lane) and extends along part of the plateau edge.*
 - *The southern parts of the sub-area are of lower sensitivity, particularly as the existing urban edge is both conspicuous and irregular and in places, has limited connection with the underlying landform. Development on more elevated parts of this sub-area would be visible over a wider area, however this would be consistent with, and seen in the context of the existing urban form.*
 - *There are few landscape features that comprise notable elements as much of the pattern has been removed. There are some remnant hedgerows within the sub-area which provide a degree of structure, but these are focussed towards the edges. Woodland areas on the east/north-east edges of the sub-area also make a positive contribution and provide local enclosure.*
 - *The northern part of the sub-area is more sensitive as the field pattern is more intact, it is more distant from the urban edge and the relative elevation would make development more conspicuous.”*
- 2.1.38 Key findings from the landscape and visual appraisal are shown in **Figure G** below, which concluded the south west and southern parts of the sub-area to be areas of ‘*lower landscape visual sensitivity*’ and the northern parts to be areas of ‘*higher landscape and visual sensitivity*’.
- 2.1.39 The boundary Green Belt review concluded that “*the most appropriate land for potential release from Green Belt for residential led development is the southern and western part of the sub-area*”.

The report provided an indicative layout for sub-area S6, with the site boundary identified for potential Green Belt release indicated by the solid yellow line (as shown in **Figure H** below). The illustrative layout suggests potential landscape mitigation measures to help maintain the integrity of the Green Belt.

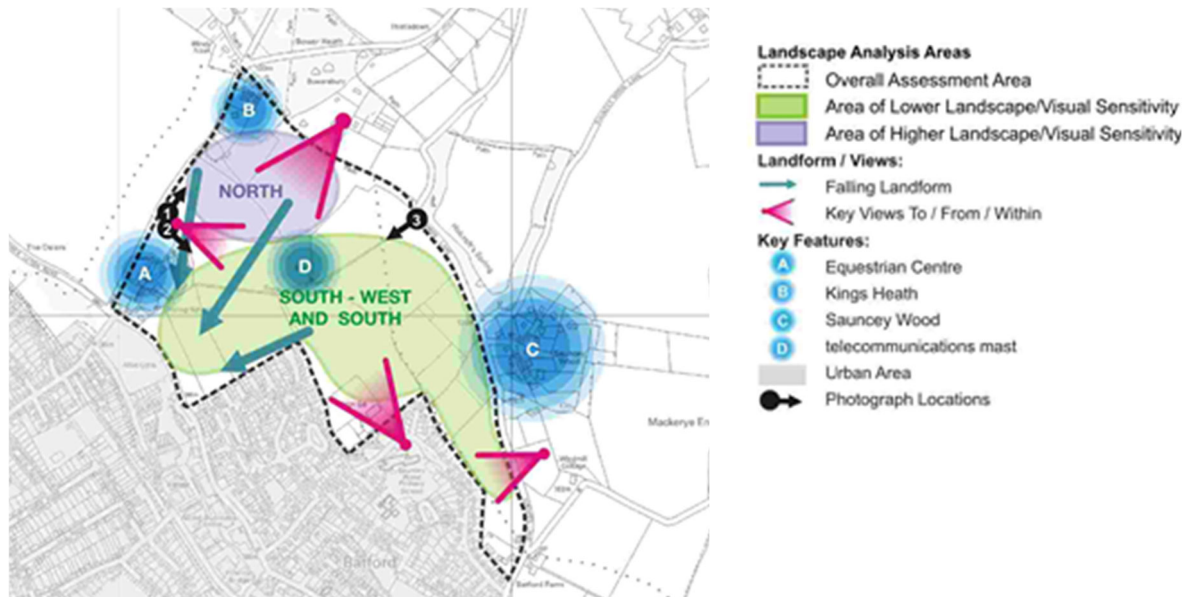


Figure G: Landscape and Visual Appraisal, Sub-Area 6 Northeast of St Albans - Extract from SACDC – Green Belt Review Sites & Boundaries Study (February 2014 - Superseded)



Figure H: Indicative Layout Sub-Area 6 Northeast of St Albans - Extract from SACDC – Green Belt Review Sites & Boundaries Study (February 2014 - Superseded)

3. GUIDANCE ON GREEN & GREY BELT

3.1.1 On 27th February 2025, the UK Government published new guidance entitled, **Green Belt: Advice on the Role of the Green Belt in the Planning System**, (“the new Green Belt guidance”) which forms part of National Planning Policy Guidance (NPPG)⁷. The new guidance explains how the Government expects local authorities to assess Green Belt “to identify grey belt land”⁸. It also explains how the contribution that land makes to the relevant Green Belt purposes should be assessed and provides further guidance on:

- how Green Belt assessments can be used in the development management process;
- in what circumstances proposals on grey belt land should be approved;
- how authorities should establish whether Green Belt land is in sustainable locations;
- the Golden Rules; and
- how to assess the potential impact of development on the openness of the Green Belt.

3.1.2 The guidance is relevant to:

- a) authorities performing a review of Green Belt boundaries to meet housing or other development needs (either prior to or as part of the plan making process);
- b) those authorities otherwise required to determine whether land constitutes grey belt in decision making; and
- c) others seeking to identify grey belt land.

3.1.3 The new Green Belt guidance makes 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.” And that this is because “...The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework.”

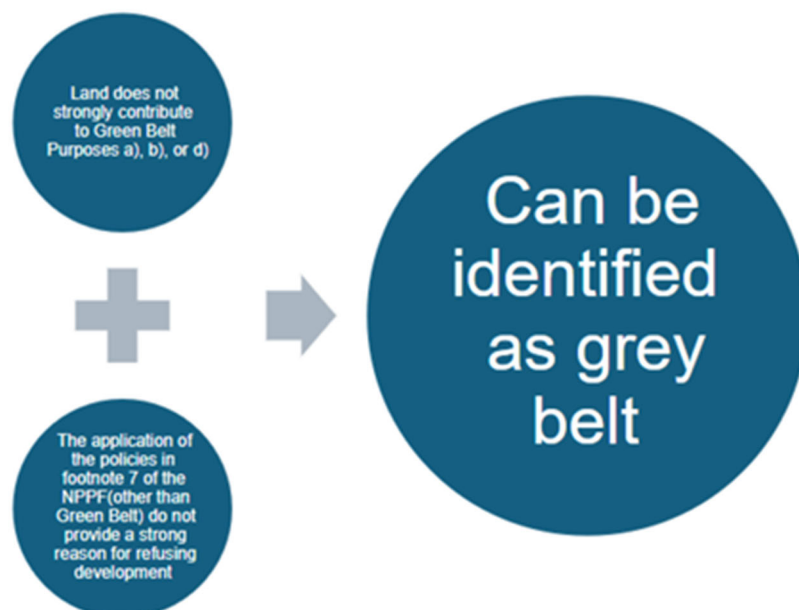
3.1.4 The new Green Belt guidance sets out how each of the three relevant purposes (set out in the NPPF at paragraph 143): (a) to check the unrestricted sprawl of large built up areas, (b) to prevent neighbouring towns merging into one another, and (d) to preserve the setting and special character of historic towns) should be assessed.

3.1.5 Against each of the purposes, a table is set out which defines “**contribution**” at three levels:

⁷ <https://www.gov.uk/government/collections/planning-practice-guidance>

⁸ See the 2nd main heading in the guidance

- Strong
 - Moderate
 - Weak or none
- 3.1.6 The guidance confirms that the assessment of these contributions is a **matter of judgment**, but that considerations for making these judgments should be informed by a set of suggested “**illustrative features.**”
- 3.1.7 After consideration of the above criteria, any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.
- 3.1.8 The new Green Belt guidance includes a summary diagram for when land can be identified as Grey Belt:



4. GREY BELT ASSESSMENT

Stage 1 – is the Site Grey Belt?

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)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development
THE SITE The Site adjoins the built-up area of Harpenden, lying directly adjacent to the north east settlement edge of Batford, with properties on Turners Close, Dane Close, Saxon Close and Noke Shot siding and backing onto the Site. The north western part of the Site features sub-urban influences in the form of Greenacres Equestrian and its ancillary facilities (stables, sheds, ménage and outbuildings). The Site features strong, defined, durable and permanent boundaries including existing tree and woodland vegetation in the north east along Common Lane, to the north along Bower Heath Lane and internally within the Site, which provide a strong degree of visual enclosure in views from the surrounding landscape. These physical features could restrict and contain future development of the Site. Due to the presence of these urban influences, the Site has an urban fringe character, rather than open countryside. This is also recognised in the St Albans Green Belt Review, which identifies the Site as being influenced by the surrounding urban area of Harpenden. Therefore, in this context it is considered the Site makes no more than ‘<u>moderate</u>’ contribution to Purpose A	

Purpose B - to prevent neighbouring towns merging into one another This purpose relates to the merging of towns, not villages.	
Contribution	Illustrative Features
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
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation
THE SITE	
As highlighted in the St Albans Green Belt Review (2023) the Site forms a very small and less essential part of the wider gap between Harpenden and Luton, due to the significant separation which exists between these two towns. From the Site, there is currently a c. 5.1km Green Belt strategic gap between the north east settlement edge of Harpenden and the south east settlement edge of Luton. Development of the whole Site would decrease this strategic gap between Harpenden and Luton by c. 450m, leaving a c. 4.65km Green Belt strategic gap. The reduction in this strategic gap would be imperceptible, with the existing gap of sufficient scale, that the removal of the Site would not result in physical or perceptual merging between these neighbouring built-up areas. As highlighted in the St Albans Green Belt Review Sites and Boundary Study (2014), it is recommended that the land north of the internal track, within the Site, is retained as Green Belt, and this substantial area of open space to be left undeveloped featuring tree and woodland buffer planting, to serve as a buffer and transition between the development and the rural open countryside. Therefore, in this context it is considered the contribution of the Site to Purpose B is <u>'weak or none'</u>	

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.

Contribution	Illustrative Features
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
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - being separated to some extent from historic aspects of the town by existing development or topography - containing existing development - not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town - have no visual, physical, or experiential connection to the historic aspects of the town

THE SITE

There are no cultural heritage designations on the Site and those in the surrounding area contribute to the wider landscape but have a negligible influence on the Site.

The nearest historic town to the Site is Harpenden, with the central historic parts designated as Conservation Area – albeit these lie approximately 700m to the south west of the Site (at their closest point) and set within and surrounded by 20th century residential parts of the settlement, which lie between the Site and this historic town (including a large employment zone along Cold Harbour Lane), substantially constraining the potential for the landscape to the north east of the town to contribute to the setting and special character of this historic town and precluding the Site from contributing to this purpose of the Green Belt. Mackerye End is a small rural settlement and designated Conservation Area which lies approximately 700m to the east of the Site (at its closest). From testing within in the field as part of the LVIA, the visual analysis found there are no views of the Site from Mackerye End Conservation Area, due to the strong enclosure created by intervening woodland and landform, and it is not considered development of the Site would substantially impact on these receptors.

The LVIA baseline considered the nature of development being proposed on the Site, concluding it would have a negligible influence at most on these heritage receptors.

Therefore, in this context it is considered the contribution of the Site Purpose D is ‘weak or none’

Addressing footnote 7 Constraints

As defined in the NPPF, grey belt excludes land where the application of policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.

THE SITE

The Site is grazing pastures and not subject to any ecological designations, nor does it feature any heritage designations or significant areas at risk of flooding. The Site does feature field boundary vegetation and individual trees subject to Tree Preservation Orders (TPO) - however it is considered these assets could be safeguarded and incorporated in future development proposals. The Site contains Previously Developed Land (PDL) (as defined by the NPPF) in the form of Greenacres Equestrian Centre, which features lawfully developed, permanent structures (stables, barns, outbuildings and ménage), that could be considered to contribute to its definition as Grey Belt.

Therefore, in this context it is considered the Site is not covered by constraints highlighted in footnote 7 of the NPPF

CONCLUSION OF STAGE 1

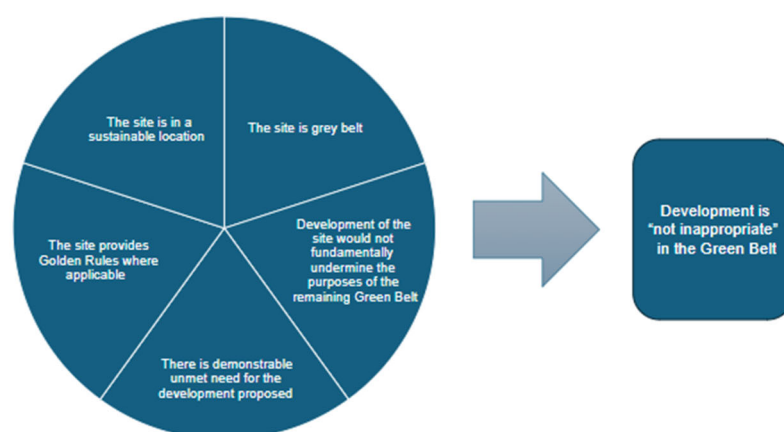
Is the Site Grey Belt?

YES – Site can be identified as Grey Belt

Site does not strongly contribute to Green Belt purposes a, b and d	√
Free from footnote 7 constraints, or harm would not provide strong reason to restrict development	√
If site is grey belt, the assessment needs to consider if the Proposed Development is “not inappropriate” in the Green Belt	Stage 2

Stage 2 – can development amount to “Not Inappropriate” Development?

- 4.1.1 If the Site is considered ‘grey belt’ after stage 1, the stage 2 assessment considers if the Proposed Development in the Green Belt is “not inappropriate” under paragraph 155 of the NPPF. All four of the other elements of this stage must be satisfied.



Development of the Site would not fundamentally undermine the purposes of the remaining Green Belt: YES APPROPRIATE

This Green Belt Review concludes development of the Site would not undermine the following purposes of the wider Green Belt:

- checking unrestricted sprawl of large built up areas
- preventing neighbouring towns from merging into one another
- safeguarding countryside from encroachment
- preserving the setting and special character of historic towns
- assisting in urban regeneration, by encouraging recycling of derelict and other urban land

There is demonstrable unmet need for development proposed: YES APPROPRIATE

St Albans faces a significant unmet need for housing, particularly affordable housing. The Government has recently published the Local Housing Need for each Authority in England, calculated using the new standard method, alongside the revised NPPF (December 2024, latest update February 2025). The updated Local Housing Need for St Albans District is 1,660pa. This gives a housing land supply of 0.9 years from a base date of 1 April 2023, which is significantly short of the required 4-year supply outlined in the National Planning Policy Framework (NPPF).

Furthermore, the latest published St Albans' Housing Delivery Test (HDT) result, published in December 2024, indicates a delivery of 52% of the government's housing target for the 2023 measurement period. This result places St Albans under the threshold that triggers a "presumption" in favour of sustainable development, meaning that the council must demonstrate a clear plan to increase housing delivery.

The Site provides Golden Rules where applicable: YES APPROPRIATE

To accord with the Government's 'Golden Rules' for release of land from the Green Belt, for major development, there is an opportunity to provide the following as part of a sustainable, landscape and community led development on the Site:

- A high percentage of affordable housing, at a rate to be agreed with St Albans' Council, whilst also increasing the volume of aspirational homes as part of a suitable balance of tenures and housing mix.
- Improvements to local and community green infrastructure facilities on this edge of the town.
- New residents and the wider public will be able to access good quality green spaces, including a substantial parkland in the northern part of the Site of over c.11ha, featuring areas of meadow grassland, woodland, trees, informal pathways, allotments and sports pitches.
- The provision of c.14ha of high quality accessible green open spaces, integrating active travel and recreational routes: within a 15 min walk of all homes on the Site and connecting with existing and emerging adjacent green corridors.
- Making on-site formal and informal recreational facilities available to the existing and new communities.

The Site is in a sustainable Location: **YES APPROPRIATE**

- The Site is in a sustainable location, lying directly adjacent to Batford, on the urban settlement edge of Harpenden, with safe access to the existing bus network and access to the Site from Lower Luton Road, Bower Heath Lane and Common Lane, which is considered to create a sustainable pattern of development, providing a logical extension to the existing urban edge of Harpenden.
- The Site is subject to urbanising influences from existing built form on the adjacent northern settlement edge of Harpenden and part of the Site features PDL (Greenacres Equestrian Centre).

CONCLUSION OF STAGE 2

The development amounts to “not inappropriate” in the Green Belt

- It will not fundamentally undermine remaining Green Belt	✓
- Unmet housing need	✓
- Meets the Golden Rules	✓
- Sustainable location	✓

5. IMPACT ON THE WIDER GREEN BELT FROM REMOVAL OF SITE FOR DEVELOPMENT

- 5.1.1 The Site is located on the north eastern settlement edge of Harpenden, to the north of the B653 Lower Luton Road and east of the B652 Bower Heath Lane. The Site comprises a series of land parcels, currently under pasture land use, separated by a central farm track and hedgerow field boundaries, as shown in the map extract below:

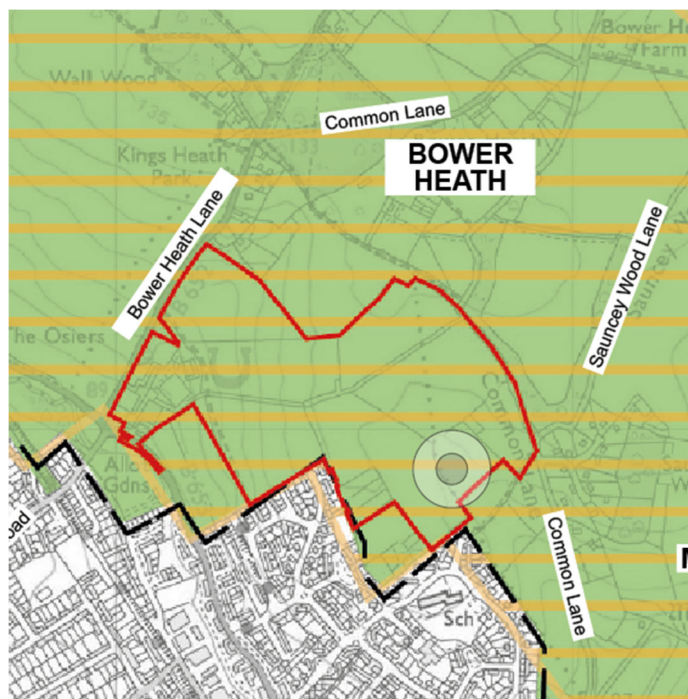


Figure J: Local Planning Policy (Extract from Figure 8.4 Planning Policy at Appendix 8.4 of the Environment Statement)

- 5.1.2 The north eastern settlement edge and defined settlement boundary of Harpenden, lies directly adjacent to the southern parts of the Site, and the whole of the Site and surrounding countryside surrounding Harpenden is in Green Belt.
- 5.1.3 Removal of the Site from the Green Belt, for residential development, would provide infill between the existing north eastern edge of Harpenden, towards Bower Heath Lane and Common Lane, with potential to provide a new, strong, defined edge to the Green Belt and creating a cohesive settlement edge to Harpenden.
- 5.1.4 Removal of the Site from the Green Belt will accord with the SACDC Green Belt Review Sites and Boundaries Study (2014), if development is focussed in the southern and western parts of the Site, adjacent to the Batford area of Harpenden. The northern extent could remain Green Belt and provided as undeveloped open space (including informal and formal recreation) with the existing central track forming a defensible boundary between the two land uses.

5.1.5 Sensitive landscape-led masterplanning of the Site would enable the implementation of a strong Landscape Framework (as illustrated in **Figure K** below), to form the basis of any development on the Site. This could include:

- retention of trees (including TPO), mature hedgerows and existing wooded vegetation along the Site's outer and internal boundaries, providing a strong edge to the Green Belt, preventing any negative urban influence or weakening of the Green Belt beyond
- hedgerow restoration and creation, to provide visual and ecological links between existing and proposed woodland areas
- use of historic hedge and field boundaries, to identify the most appropriate location for woodland restoration and expansion
- improvement to the network of woods within the open plateau landscape in the north / northern eastern part of the Site, by planting on the tops of the slope, emphasising the valley form and screening the built edges of development and this edge of the settlement
- ensuring the Proposed Development is set back behind the existing track that runs east / west centrally through the Site, forming a new green corridor and area of open space (to prevent perceptions of urban sprawl) - creating enclosure, visual unity and an enhanced, defensible Green Belt boundary to the settlement edge
- providing a complementary and substantial landscape treatment along the northern edge, facing onto the Green Belt, to reduce impact on the surrounding landscape - softening views of the development and ensuring that the planting and built form ties into the character and appearance of its surroundings
- existing settlement within Harpenden is set on the valley slopes within a wooded skyline and the Development Proposals must be designed to accommodate sufficient green infrastructure to assimilate with this character in the long term - this requires the planting of woodland, landscape buffers and trees, to maintain the character of the skyline
- development on the Site should create a transition from urban to rural character - using height, materials, density and landscaping to create a permeable edge to the north, north east and north west

5.1.6 The outer boundaries would be formed of predominantly durable features that are readily recognisable and likely to be permanent, including existing vegetation, woodland, mitigation planting and Bower Heath Lane and Common Lane.

5.1.7 It is proposed the revised Green Belt boundary would comprise Bower Heath Lane to the north west, the existing track that runs east / west centrally through the Site to the north and Common Lane to the north east.

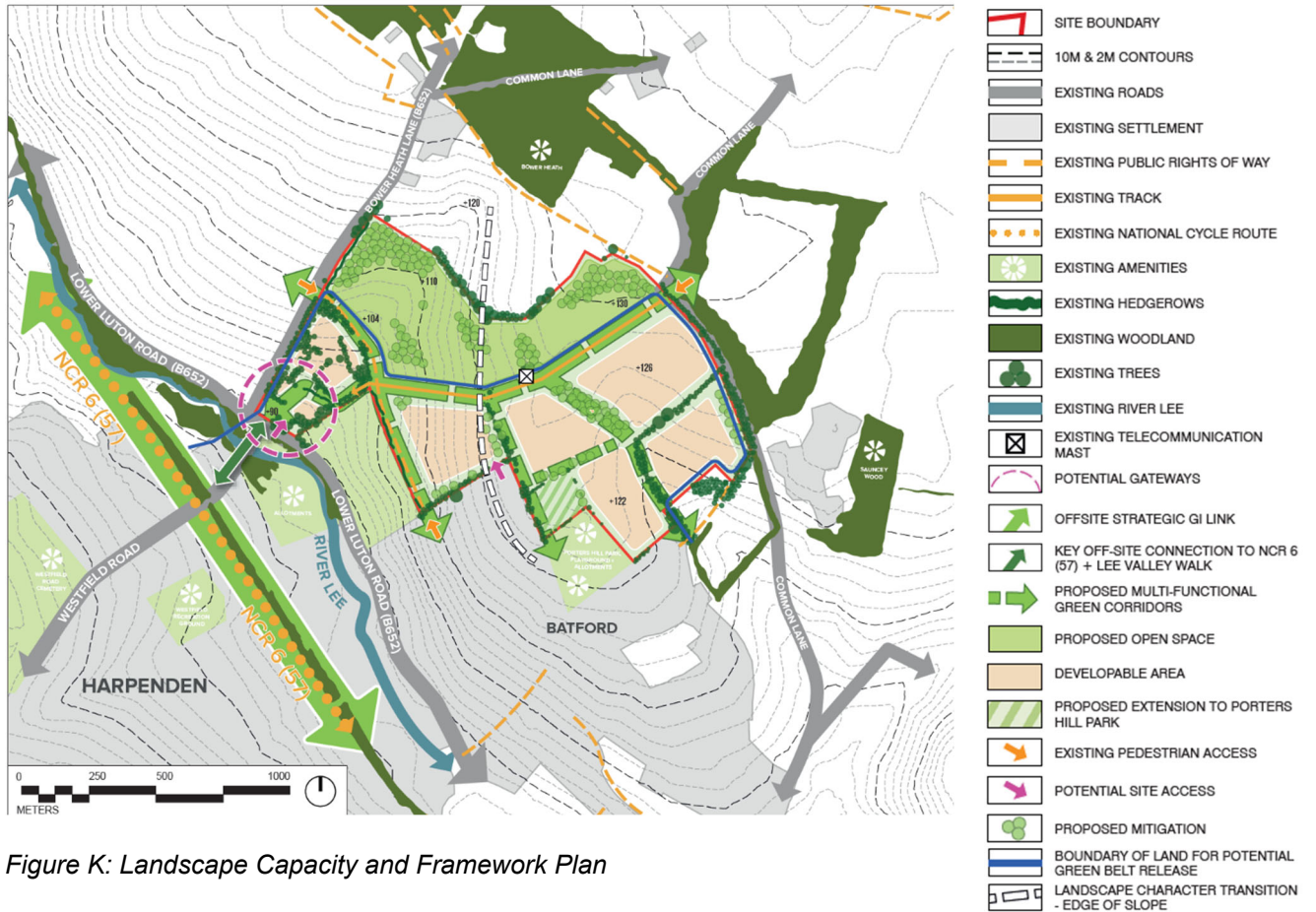


Figure K: Landscape Capacity and Framework Plan

6. ENHANCEMENTS & POTENTIAL FOR REDEFINITION OF GREEN BELT

6.1.1 The NPPF stipulates that, altering the boundaries of the existing Green Belt must only be done through new or updated Local Plans and “*exceptional circumstances*” are required.

6.1.2 NPPF paragraph 151 states:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

6.1.3 The most common reasons given by inspectors⁹ for deciding that “*exceptional circumstances*” exist to justify the release of Green Belt in a local plan include:

- Unmet need for development – housing need within an area
- The release is the most sustainable option
- Lack of contribution to Green Belt purposes
- Creation of defensible boundaries
- Limited visual impact
- Provision of Infrastructure

6.1.4 In relation to the last point ‘provision of infrastructure’, larger developments play a role in providing and improving transport or social infrastructure for the benefit of new and surrounding existing communities. In some cases, allocation and release of Green Belt land is judged to be the only possible way of enabling a scale of development sufficient to fund new provision and avoiding strain on existing facilities.

6.1.5 Sensitive landscape-led masterplanning of the Site, as described above, would enable the implementation of a new defensible Green Belt boundary, extending the existing strong durable boundaries, as described in Section 5 above.

6.1.6 There is an opportunity to redefine Harpenden’s settlement boundaries with the Green Belt, as described above, whilst also ensuring release for development will:

- Provide the existing surrounding communities with a range of publicly accessible recreational facilities, including a network of open spaces throughout the Site, that provide the opportunity for allotments, community gardens, amenity green spaces and children’s play.

⁹ <https://www.planningresource.co.uk/article/1682501/five-circumstances-exceptional-enough-justify-green-belt-release-local-plans>

- Further enhance the strong network of hedgerows, woodlands and defensible boundary features contributing to Green Belt enclosure.
- Improve connectivity between the settlement edge of Harpenden out to the countryside in the north and north east, via green corridors and links through the Site, which have the potential to connect into the existing PRoW network beyond.
- Create new public open space which supports new development and provides opportunities for: outdoor sport and recreation for the local community; accessible footpaths / cycleways; local food production; enhancement of biodiversity value through habitat creation; and improvement of overall amenity value of the landscape.
- Provide a new defensible edge to the Green Belt, combined with features within the Green Belt, to reduce the perception of coalescence and sprawl, whilst improving connectivity between communities.

6.1.7 The Site lies in a strategic position within the Hertfordshire Green Infrastructure (GI) network, where future development provides the opportunity to contribute to the sub-regional strategic GI network. The **St Albans District Green Infrastructure Plan (March 2011)**¹⁰ identifies the Hertfordshire Green Infrastructure Plan for St Albans illustrating the proposed Green Infrastructure Network and the component action zones. There is an opportunity, as part of the Landscape Strategy for the Site at north east Harpenden, to contribute to the St Albans strategic GI initiatives by:

- Improving the permeability and legibility of the movement network, providing new multi-functional green links between the settlement edge of north east Harpenden, the Site and the wider countryside beyond to the north and north east.
- Improving and enhancing the habitat mosaic and biodiversity across the Site (which currently comprises grazed pastures, featuring fragmented hedgerow field boundaries) - connecting the fragmented habitat network, through reinstating and creating a new habitat mosaic of wetlands, grasslands and woodlands, in addition to linear features such as hedgerows and sustainable drainage features.
- There is an opportunity to upgrade the existing public footpaths running through the Site, to allow for a wider user group (including cyclists and horse riders), as well as providing safe onward connections along Bower Heath Lane, Common Lane and across Lower Luton Road, to connection into the wider PRoW network
- Using green infrastructure to contribute positively to landscape character enhancement, restoration and linkages.

¹⁰ [SP_GreenInfrastructurePlan_March2011_tcm15-46531.pdf \(stalbans.gov.uk\)](#)

- Improving the network of woods within the open plateau landscape around Harpenden by planting on the tops of the slopes to emphasise the valley form and to screen the raw built edges of 20th century development.
- 6.1.8 Overall, it is considered therefore, that sensitive landscape-led development of the Site could be achieved without resulting in a negative impact on, or weakening of, the purposes or strength of the wider Green Belt beyond the boundaries of the Site.

BMD

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