THREE RIVERS CORE STRATEGY EXAMINATION

STATEMENT ON BEHALF OF

MERCHANT TAYLORS’ SCHOOL AND

ROYAL MASONIC SCHOOL FOR GIRLS

MATTER 3 : GREEN BELT (CP11)

INTRODUCTION

1. This Examination Statement has been prepared by Vincent and Gorbing Planning Associates in relation to Matter 3 Green Belts. In particular, it addresses the Inspector’s Question 3.8 which states as follows :-

   *Have requests to designate new MDS’s at Merchant Taylors School, Royal Masonic School, The Grove and Langleybury Estates been considered? Is the decision not to designate any new MDS’s supported by robust evidence?*

2. This submission deals with two of these sites, namely, Merchant Taylors’ School (MTS) and Royal Masonic School for Girls (RMSG).

3. In this submission we will make the case that proper consideration has not been given to the designation of these sites as MDS’s. Accordingly, there is no robust evidence to support the decision not to designate them. However, as importantly, the failure to designate them as MDS’s is also inconsistent with national policy and, by the absence of the designation, will render the Core Strategy ineffective. PPS12 tests of soundness require a DPD to be justified, effective, and consistent with national policy. In our submission, the Core Strategy, in relation to these two sites, is unsound in relation all three of these tests.

4. Vincent and Gorbing have represented numerous independent and state sector schools for many years, particularly around the outer edges of the London
conurbation where Green Belt policy applies. We have first-hand experience of helping such schools devise long term plans in close collaboration with Local Planning Authorities and advancing planning applications to meet ever-changing curricular and extra-curricular needs. We also have considerable experience in the designation of Major Developed Sites at such schools and how MDS designation can, in accordance with the intention behind the policy in PPG2, allow for effective planning by both the institutions themselves (by allowing infilling to meet legitimate and beneficial educational needs) and by Local Planning Authorities in seeking to support educational provision whilst ensuring adequate control of development, subject to clear criteria, that does harm the objectives and purposes, or the visual amenities of the Green Belt.

5. This statement is submitted pursuant to the representations made on behalf of both Merchant Taylors’ School, Northwood, and Royal Masonic School for Girls, Rickmansworth. Vincent and Gorbing have acted on behalf of both schools for a considerable number of years and have, at each, developed master plans and submitted planning applications, as well as pursuing these representations at each stage of the production of the Core Strategy.

6. Indeed, both schools have been consistent throughout the preparation of the Core Strategy that the site of each should be defined as a Major Developed Site within the Green Belt in policy CP11. Representations were made at Issues and Options Stage, Preferred Options, and Proposed Submission Stage.

7. The only response the Council has ever provided was at Preferred Option stage where it was stated that each site “was not considered suitable for designation in accordance with national policy.”

8. We consider this position to be wholly unjustified.

ABOUT THE SCHOOLS

Merchant Taylors’ School

9. An aerial photograph and plans of Merchant Taylors’ School are attached in Appendix 1.
10. The School has been located at its site in Northwood since 1933. Since that time there has been on-going development in order to meet curricular and extra-curricular needs. This is a feature of all schools. Constant review of buildings to meet modern educational requirements is essential and new requirements often mean new buildings. At MTS there has been an on-going development programme over the years, with the most recent buildings to be constructed on the east side of the main drive erected between 1974 and 1999 and the recent construction of sports related buildings at the northern end of the developed area.

11. The School has undertaken a comprehensive evaluation of its operational requirements including the need for new buildings, upgrading of existing buildings and works to access and circulation routes.

12. Future curricular needs are difficult to forecast with any certainty and may change given new academic trends or other external factors. The main requirements for additional space, however, are expected to be as follows:

- Additional accommodation for Design and Technology: this department is outgrowing its present building and will be relocated to a dedicated new building allowing further space for workshops, storage and display. This scheme will be the subject of a planning application within the next 12 months.

- A new performing arts complex: School performances are presently undertaken in the Great Hall which is considered unsatisfactory for a number of reasons. A site for the Performing Arts Complex will be identified.

- In general, additional more flexible teaching spaces will be needed, that could not easily be created by refurbishment of the old buildings – consequently, additional floorspace will be required.

13. A Master Plan to address these issues was prepared, aimed at providing modern facilities that meet the needs of the School well into the 21st Century, to provide high quality facilities for delivery of the curriculum, and to achieve this by using space efficiently and refurbishing buildings wherever possible and to thereby
minimise the amount of new development that is required to meet future needs. The Master Plan recognises the status of the site as Green Belt and seeks to ensure that any new buildings have no greater impact on the Green Belt than those existing and opportunities should be taken wherever possible to reduce the impact. The Master Plan does not lead to a significant increase in the already developed areas of the site.

**Royal Masonic School for Girls**

14. An aerial photograph and plans of Royal Masonic School for Girls are also attached in Appendix 1.

15. RMSG has been located at its site in Rickmansworth since 1933. Since that time there has been on-going development in order to meet curricular and extra-curricular needs. Most recently, a new assembly hall and extensions to one building, Cadogan House, to allow for its conversion to a pre-prep and prep department were approved and have recently been completed.

16. As part of the planning exercise to refurbish and extend Cadogan House, RMSG undertook a comprehensive evaluation of its operational requirements, alongside a space planning and space rationalisation exercise which considered upgrading of existing buildings and the need for new buildings.

17. As at MTS, future curricular needs are difficult to forecast with any certainty and may change given new academic trends or other external factors. The main requirements, however, are expected to be as follows.

18. A new performing arts complex: The performing arts are an expanding area of the curriculum and many other Schools are now developing or planning new performing arts buildings. At present the School presently uses theatres or performance spaces off site, either at other maintained schools or owned by the Local Authority. Performing Arts subjects (music, singing, drama) are presently widely spread around the Campus and need to be brought together.

19. A new Creative Arts Centre: the creative arts (art, ceramics, photography, textiles) are also widely spread around the campus and need to be brought
together. A dedicated department would allow for further space for workshops, storage and display. Recent changes to the curriculum mean that much more storage for students' work has to be provided and so both Art and Design Technology need to have more space in future.

20. In addition, a key objective of the proposals is to increase the number of boarders at the School. This requires up-grading and enhancement of the existing boarding houses. When the School opened in the 1930s there were some 400 pupils, all of which were boarders. They were accommodated in dormitories which are now considered unacceptable with basic amenities such as central washing and toilet facilities.

21. In addition to the above, the School is looking to improve its sporting facilities with the additional of an all-weather pitch.

22. Reconfiguration of accommodation across the site – allowed for by the relocation of the prep and pre-prep departments to Cadogan House – will mean that it is likely that requirements for the performing arts, creative arts and Design and Technology can be accommodated largely in existing buildings with limited new development. A Master Plan to address these issues was prepared and was submitted to the Council in January 2008. As at MTS, the Master Plan recognises the status of the site as Green Belt and seeks to ensure that any new buildings have no greater impact on the Green Belt than those existing and opportunities should be taken wherever possible to reduce the impact.

23. RMSG therefore has future operational requirements and it is clear that during the Plan period further limited infilling may well be required as curricular and extra-curricular needs arise.

SOUNDNESS TEST: COMPLIANCE WITH NATIONAL POLICY

24. Despite the above analysis, the Green Belt designation of each site presently means that any educational development is considered inappropriate in terms of PPG2 advice. Consequently, however small, whether it be an extension, a replacement of an existing building or a new building, and even if its impact on the Green Belt in practice is insignificant, all development at each school must be
justified by very special circumstances (vsc) as set out in para. 3.2 of PPG2. The
test of very special circumstances is a very high hurdle indeed, given PPG2 advice
(and court cases that have considered this advice) that where development is
inappropriate by definition, vsc will not exist unless the harm by reason of
inappropriateness, and any other harm, is clearly outweighed by other
considerations.

25. We will discuss the practical implications of this position further below, but
suffice it to say that this policy position renders any long term planning at each
site fraught with uncertainty given that, even for buildings set within the midst of
existing developed areas, an overwhelming educational case must be made and
accepted for vsc to be demonstrated. Hence, each school does not know whether
such a case will be accepted for any proposal they advance until such time as a
comprehensive planning application is made.

26. This approach should not be necessary given the advice of PPG2 regarding the
designation of Major Developed Sites, and given that :-

- Much of the development at each site pre-dates Green Belt policy
- there is a significant quantum of existing floorspace at each site already
- development can be accommodated without injuring the openness of the
  Green Belt; and
- there will be significant benefits of modest additional development.

27. For the following reasons, the designation of each site is entirely in accordance
with Annex C of PPG2.

28. Prior to the 1995 version of PPG2, ‘institutions standing in extensive grounds’
were not considered inappropriate within the Green Belt. This dispensation was
removed in the 1995 version of PPG2, but was replaced by an approach which
allows local authorities to identify major developed sites in the Green Belt where
infilling and redevelopment is not inappropriate development subject to certain
criteria.
29. The PPG does not provide specific advice on which type of uses qualify and which do not; nor does it provide advice on how ‘major’ or how ‘developed’ such sites need to be to qualify for this status. However, paragraph C1 specifically mentions educational establishments in the list of types of uses that could be designated as major developed sites within the Green Belt. It also states that they often pre-date the planning system and Green Belt designation and may be in continuing use or redundant.

30. It is clear from this advice that schools within the Green Belt may qualify for MDS status. In the case of both of these sites, the establishment of a school at each pre-dates the planning system, and development has been allowed over the years, and particularly prior to 1995 on the basis of the ‘institutions standing in extensive grounds’ exception in the earlier version of PPG2, and each contains a substantial amount of development. The designation of the developed area at each site would be entirely consistent with PPG2.

31. Allied to this analysis, we have undertaken a review of practice in other authorities, and we attach extracts from three Development Plan Documents in Appendix 2. In all three authorities (Welwyn Hatfield, Hertsmere and East Herts) these DPDs identify schools in their list of Major Developed Sites. Although they are Local Plans rather than Core Strategies, each was prepared in the context of extant national guidance in PPG2, the guidance on which basis TRDC have identified two MDS’s, but not the two sites that are the subject of these representations.

32. The key criteria for designation as an MDS that we have established from these case studies relate back to the advice of PPG2 and are as follows:-

- The size of the site
- The quantum of existing development and the level of activity, employment etc.
- The prospects of future infilling or partial redevelopment that could occur without injuring the purposes of the Green Belt.
Site size and quantum of development

33. In relation to Merchant Taylors’ School, the school’s ownership extends to almost 100ha., with an educational campus (including playing fields) of some 60ha. The main developed area of the School extends to some 10ha., an area which contains a large number of buildings. The site comprises around 20,000 sq.m. of built floorspace and accommodates 867 pupils and employs 210 full time and part time staff.

34. Similarly, the Royal Masonic School for Girls site amounts to some 68ha. with an educational campus (including playing fields) of some 39ha., and a core developed area of some 17ha. The floorspace of existing buildings is approximately 30,000sq.m. and the School accommodates some 850 pupils and employs around 250 full and part-time staff.

35. By any analysis, both sites are major educational establishments of the kind referred to in Annex C of PPG2. They are significant sources of activity, employ significant numbers of people in each case, and are in quite a different category in terms of land use and quantum of development as compared to land uses and buildings located within the Green Belt elsewhere within the District such as farm complexes and leisure facilities. The other areas where significant development exists within the Green Belt (apart from the two MDS sites identified in the Core Strategy) are existing villages that are washed over by the Green Belt. In these villages limited infilling is permitted as appropriate development in accordance with the advice of para. 3.4 of PPG2.

36. In addition, each site, with their core cluster of buildings of various ages, can accommodate additional development – either by infilling or redevelopment of existing buildings – that would not injure the purposes of the Green Belt. Indeed, as stated above, educational institutions are in constant need of up-dating and modernisation to meet curricular needs, and therefore educational benefits would arise. The benefits of limited infilling at MDS sites is recognised in para C3 by the reference to opportunities to create jobs and prosperity in a form that does not prejudice the Green Belt. Indeed, the provision for the designation of such sites is to ensure that they are not unnecessarily constrained in meeting operational needs.
The benefits of expansion at higher and further education institutions are specifically recognised in paras. C15 – C17.

**Test of soundness : evidence base**

37. We have reviewed again the evidence base published in support of this DPD. The Council has not undertaken a Green Belt review at this stage, deferring decisions on minor revisions to the Green Belt to the Site Allocations DPD in order to meet future development needs. However, the Core Strategy does identify major developed sites at Maple Lodge Sewage Works and Leavesden Aerodrome (with the latter being identified for review in the future). The Core Strategy states that “This designation acknowledges that development in these areas may be necessary over the Plan period for strategic and operational reasons.” Exactly the same reasoning applies to both MTS and RMSG as set out in this statement.

38. There is no evidence before the Examination that the Council have undertaken a review of other currently developed sites within the Green Belt (including MTS and RMSG) and assessed them against the advice of PPG2 or considered best practice from other authorities in this regard.

39. As highlighted above, the rejection of the designation of these sites as MDS’s within the Green Belt was stated by the Council at Preferred Option stage as being on the basis that they are not considered to be “suitable for designation in accordance with national policy.” No evidence or further clarification was provided to support this contention.

40. This absence of evidence renders the Core Strategy unsound in this respect. Both sites are clearly of a type that is referred to in PPG2 advice, and their characteristics are such that they are entirely befitting of MDS status. The Council’s comments at Preferred Option stage provided no rigorous analysis. Indeed, there would be significant benefits in terms of allowing certainty in future planning and achieving positive educational objectives; MDS status represents the most appropriate strategy as compared to washing the Green Belt over the sites without an MDS boundary.
Test of soundness: effectiveness of the DPD

41. As we have highlighted above, the designation of MDS’s at educational establishments, as recognised in PPG2, has significant benefits in encouraging effective future planning. The need to demonstrate vsc each and every time a planning application is made for legitimate educational development at each site leaves the prospects of achieving planning permission highly uncertain given that the educational benefits (the central plank in the vsc case) must be weighed not only against the impact of the proposed development on the Green Belt in practice, but also against the harm, which (PPG2 specifically advises) arises in principle by reason of any educational development being inappropriate.

42. For the schools themselves, this makes long term planning highly problematic. At each institution, as planning consultants, we have encouraged long term master plans and both schools have adopted this approach. However, the extent to which such master plans can be used as vehicles for engagement and agreement with the Council outside of the narrow confines of individual planning applications is extremely limited as it is not, in practice, possible to make a detailed vsc case until such time as a planning application is submitted with detailed supporting educational and Green Belt justification.

43. The Council are not unsympathetic to the development needs at each site (indeed, they have approved new buildings in recent times in the context of the existing Green Belt designation) but they themselves are constrained in their ability to engage in long term planning due to the requirements of Green Belt policy.

44. We therefore remain convinced that the designation of both schools as MDS’s in the Green Belt will ensure that the Core Strategy is effective. It will formalise an appropriate level of control and will ensure that the application of policy is flexible, coherent, and consistent with other neighbouring or nearby authorities. The designation of the sites will not alter the impact of each site on the Green Belt since, again in accordance with PPG2, Green Belt policy would continue to apply to them. However, it will allow each institution to be properly considered over the plan period, a period during which it is known that operational development
for educational purposes will be necessary. Failure to designate the sites as MDS’s will therefore fail this test of soundness.

CONCLUSION

45. We therefore summarise as follows.

Which part of the Core Strategy is unsound?

46. Policy CP11 Green Belt is unsound in relation to its identification of Major Developed Sites and the failure to designate the educational establishments at Merchant Taylors’ School and Royal Masonic School for Girls.

On which soundness tests does it fail?

47. The failure to designate these sites as MDS’s conflicts with a number of aspects of the soundness tests in PPS12. It is not justified by the evidence base, nor is it the most appropriate approach when considered against the alternative of designation. It is not effective since it does not allow for legitimate and helpful long term planning of beneficial educational development at each site. Finally, it is not consistent with national policy.

Why it fails on these tests?

48. As highlighted above:

(i) The Council have undertaken no rigorous assessment as to the application of Green Belt policy to these sites; there is no evidence base to support their position that the designation of these sites as MDS’s fails to accord with national policy.

(ii) The need to justify every development on the basis of vsc frustrates long term planning, leaving capital investment programmes that require planning permission in an on-going position of uncertainty. This approach is not effective for either the schools themselves or the Council.
(iii) The failure to designate these sites in the Core Strategy does not accord with the advice of PPG2 given their scale and character and given the need to provide for future educational requirements.

*Changes to the DPD required making it sound*

49. The Core Strategy should be amended by the addition of Merchant Taylors’ School and Royal Masonic School for Girls as a Major Developed Sites in the Green Belt in Policy CP11.

50. This would be achieved by the following addition in the policy :-

“The Council will…..

(e) Identify the developed area at Merchant Taylors’ School and Royal Masonic School for Girls as new Major Developed Sites within the Green Belt.”

51. Attached to this statement as Appendix 3 are two plans showing our proposed extent of the MDS boundary at each. In our submission, the definition would be helpfully included within the Core Strategy and not deferred to the Site Allocations DPD.

Vincent and Gorbing

16 May 2011
Three Rivers District Council
LDF

Merchant Taylors’ School:
Green belt boundary and the extent of the urban area

SCALE: 1:10000
DATE: MAY 2011
CHECKED: HNA
DATE: 05/3

PROJECT No: 4874

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Royal Masonic School for Girls:
Site location plan

SCALE: 1:10000
DATE: MAY 2011
CHECKED: HNA

PROJECT NO: 4874

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APPENDIX 2

EXTRACT FROM CURRENT DEVELOPMENT PLAN DOCUMENTS

1. Welwyn Hatfield District Plan 2005
2. Hertsmere Local Plan 2003
3. East Herts Local Plan 2007
15.12 Where the original dwelling has already been extended permitted development rights will normally be removed and any subsequent proposals for extensions to the replacement dwelling will be considered against Policy RA3.

Policy RA4 - Replacement of Dwellings in the Green Belt

Permission for replacement dwellings within the Green Belt will not be granted unless all of the following criteria are met:

(i) The replacement dwelling would not materially exceed the size of the original dwelling in terms of its floorspace, height and volume (existing outbuildings (including detached garages) will not contribute to the calculation of the size of the replacement dwelling except in very exceptional circumstances);

(ii) The proposed dwelling would have no greater visual impact in terms of prominence, bulk and design on the character, appearance and pattern of development of the surrounding countryside;

(iii) The proposed dwelling is designed to reflect the character and distinctiveness of its rural setting and to accord with the design policies elsewhere in the plan and the supplementary design guidance.

Permitted development rights may be removed from the replacement dwelling where its volume is similar to that of the original dwelling and the original dwelling has already been extended.

Major Developed Sites in the Green Belt

15.13 PPG2 defines major developed sites in the Green Belt, whose buildings and uses predate the Green Belt designation and which require special policies to limit their future development. There are five such major developed sites within the district, all of which are large research or educational establishments. They are:

The Frythe, Welwyn;
New Barnfield Resources Centre, Hatfield;
Queenswood School, Brookmans Park;
The Royal Veterinary College, North Mymms;
Monks Walk and Tewin Water School, Welwyn Garden City.

The boundaries of these sites are shown on Inset Maps 4 to 8. The Royal Veterinary College is also dealt with under policy RA7 because of the special circumstances relating to its development.

15.14 Where the existing uses on these sites are successful there is pressure to expand, alter or intensify development. If, at some future point, the facilities on any of these sites are no longer required there will be pressure for redevelopment. All such sites remain subject to restrictive Green Belt development control policies. However, the Council recognises that limited infilling may be acceptable at the sites, which are in continuing use, in order
to retain jobs, but without prejudicing the Green Belt further. Alternatively the complete or partial redevelopment of major developed sites may offer opportunities to improve the environment of the area, without adding to their impact on the openness of the Green Belt.

15.15 However, due to the scale of the Major Developed Sites, it is important that any infilling or redevelopment does not occur in an unplanned, incremental way over time, which, taken cumulatively, could have a harmful effect on the Green Belt. Therefore, the Council requires any development to be dealt with comprehensively and brought forward in the context of a master planning brief for each site. The briefs should cover the essential details of planning policy, a Green Travel Plan (if required in accordance with Policy M3) and car parking management scheme, the operational requirements for the site, the principles to guide development, the proposed future layout of the site, any phasing of development, future planning controls and detailed landscaping proposals reflecting landscape character and dealing with rights of way improvement. The briefs will serve as supplementary planning guidance for development control purposes. Therefore, they must be the subject of public consultation, approved by the Council and kept up to date.

Policy RA5 - Major Developed Sites in the Green Belt (Limited Infilling)

Limited infilling within the Major Developed Sites shown on Inset Maps 4 to 8 will be permitted subject to the following criteria:

(ii) The proposal will have no greater impact on the purposes of including land within the Green Belt than the existing development;

(iii) The proposal should not exceed the height of the existing buildings;

(iv) The proposal should not lead to a major increase in the developed proportion of the site;

(v) The proposal should be brought forward in the context of a master planning brief for the site as defined in paragraph 15.15;

(vi) Any new development must be acceptable in terms of its impact on the highway network, including highway safety.

Policy RA6 - Major Developed Sites in the Green Belt (Redevelopment)

Complete or partial redevelopment will be permitted within the boundaries of the Major Developed Sites, as shown on Inset Maps 4 to 8, subject to the following criteria:

(i) Proposals should have no greater impact than the existing development on the openness of the Green Belt and the purposes of land including land within it, and wherever possible should have less impact;

(ii) Proposals should make a positive contribution to achieving the objectives for use of land in the Green Belt set out in paragraph 4.7;

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(iii) Proposals should not occupy a greater footprint of the site than the existing buildings, excluding temporary buildings, open spaces with direct external access and areas of hardstanding, unless this would achieve a height reduction to the benefit of visual amenity;

(iv) Buildings should not exceed the height of the existing buildings;

(v) The proposal should be brought forward in the context of a master planning brief for the site as defined in paragraph 15.15;

(vi) The preparation of a Green Travel Plan when required under Policy M3, to include measures to control vehicle movement and increase travel to and from the site by alternative modes of transport; and

(vii) Any new development must be acceptable in terms of its impact on the highway network, including highway safety.

The Royal Veterinary College

15.16 A Major Developed Site has been defined at the Hawkshead Campus of the Royal Veterinary College (RVC) in recognition of the scale of development which currently exists on the site. It is recognised that the RVC is an important higher education institution. It is one of only six veterinary colleges in the country and has an international reputation as a centre of excellence for education. There is an increasing demand for vets in this country, which is reflected in the growing student numbers of the RVC. In addition, as a result of the increasingly sophisticated clinical needs of the profession, together with the changing responsibilities of the profession in terms of food safety, hygiene and animal diseases, there is a need to provide more sophisticated and comprehensive teaching, research and related facilities for the College.

15.17 Whilst the RVC is located within the Green Belt, where new development would usually be considered inappropriate, it is recognised that the RVC does have a claim to having exceptional circumstances which will be taken into consideration when assessing development proposals. The present campus was established many years ago and is now the only location for the College’s essential rural operations. As a veterinary college, it is necessary that it is situated in a location with immediate access to farmland and suitable accommodation for all types of animals. In addition, as a higher education institution, the provisions of Annex C of PPG 2 should be taken into consideration; as the majority of the RVC’s landholdings are within the Green Belt, and there is no reasonable alternative site outside the Green Belt, some reflection of this situation must be made in considering proposals for new development.

15.18 The Council will therefore consider carefully any proposals for further development by the RVC, especially in terms of their impact on the appearance and amenity of the Green Belt and the traffic and travel implications of development. Wherever possible, new development should be within the currently defined Major Developed Site boundary. Proposals for development outside this boundary will need to demonstrate that they meet the test for very special circumstances as set out in PPG2. The Council would
(vi) wherever possible facilities utilise existing buildings.

Note: See also Policy C4.

Cemeteries and Memorial Gardens in the Green Belt

12.1 The need to provide for additional burial space may arise over the Plan period. Cemeteries are an appropriate Green Belt use where the openness of the Green Belt is preserved and the proposed use would not conflict with the purposes of including land within the Green Belt. It is important to ensure that any associated buildings or memorial stones do not intrude into the open nature of the Green Belt. Sites should be designed to take advantage of existing contours and be extensively landscaped to prevent long views into the burial area. In all cases, such uses should be well located to the road network and, where possible, to passenger transport facilities. Adequate car parking should be provided within the boundaries of the site. Whilst no site has been identified in this Plan, the principle of woodland and green burial sites will be supported.

Policy C17: Cemeteries and Memorial Gardens
Cemeteries and Memorial Gardens with essential small scale ancillary buildings may be acceptable in the Green Belt but only where advantage is taken of existing site contours, when provided with landscaping and screening to prevent memorials being seen in long views and where the openness or visual amenity of the Green Belt would not be harmed. Proposed developments should be well located to the highway network and comply with the County Council's policy for traffic on rural roads. Suitable parking provision and landscaping must be incorporated in proposals to ensure that the vehicles are safely parked in off-road locations and that the development does not prejudice the openness of the Green Belt. In suitable locations, woodland and green burial sites will be permitted.

Major Developed Sites in the Green Belt

13.1 Following the revisions to PPG2 in January 1995 local authorities can identify major developed sites in the Green Belt that are suitable for redevelopment or where infilling may take place. Hertsmere's Green Belt contains a number of educational and research establishments which are identified in this Plan as major developed sites for the purposes of PPG2. The majority of these sites are in continuing use and have in the past been granted planning permission for extensions, new buildings, sports facilities and other alterations. It is anticipated that the need for some development will continue. Since January 1995 the construction of new buildings inside a Green Belt is inappropriate development unless the criteria set out in para. 3.4 of PPG2 are satisfied. This meant that any new buildings on these established sites, however limited their impact on the openness of the Green Belt, had to make a case of very special circumstances and, in most cases, be referred to the Government Office under the departures Direction before planning permission could be granted. Whilst it is considered reasonable for this to continue to be the case for the majority of sites in the Green Belt on certain sites limited infilling or redevelopment may be acceptable, within defined limits, without the openness of the Green Belt being jeopardised. In the case of infilling, any proposals sited outside the defined areas for infilling will be subject to Policy C1 Green Belt and inappropriate development will not be permitted except in very special circumstances.
13.2 Major developed sites in the Green Belt have been identified on the Proposals Map and are listed below. For the avoidance of any doubt the South Mimms (Bignell’s Corner) Special Policy Area is not classed as a major developed site. It is dealt with in the Movement chapter (see Policy M14).

- Aldenham School, Letchmore Heath
- Bio Products - Dagger Lane, Aldenham
- Bushey Hall School
- Bushey Meads School
- Dame Alice Owen’s School - Sawyers Lane, Potters Bar
- Haberdashers’ Aske’s School (Boys) - Aldenham Road, Elstree
- Haberdashers’ Aske’s School (Girls) - Aldenham Road, Elstree
- Imperial Cancer Research Fund (ICRF) - Blanche Lane, South Mimms / Ridge
- International University - The Avenue, Bushey
- National Institute for Biological Standards and Control (NIBSC) - Blanche Lane, South Mimms / Ridge
- Nicholas Hawksmoor School and Sports Centre, Cowley Hill, Borehamwood
- Queens School, Aldenham Road, Bushey
- Purcell School, Aldenham Road, Bushey
- St. Margaret’s School, Merry Hill Road, Bushey
- Watford Campus, University of Hertfordshire, Wall Hall, Aldenham.

13.3 On these sites applications will be considered in relation to the advice set out in Annex C of PPG2 and the criteria in Policy C18. Limited infilling may be acceptable on these sites within the areas defined on the Proposals Map and shown in greater detail on the enlarged maps in Appendix 3. These have been defined to reflect the areas where buildings are mainly concentrated. For some sites the area defined has been extended to accommodate anticipated development which would not have an adverse impact on the openness of the Green Belt.

13.4 In some instances complete or partial redevelopment may offer the opportunity for environmental improvement so long as this does not prejudice the objectives of including the site in the Green Belt.

**Policy C18: Major Developed Sites in the Green Belt**

The Major Developed Sites in the Green Belt are identified on the Proposals Map and proposals will be assessed in relation to the advice set out in Annex C of PPG2. Infilling may be appropriate within the defined areas subject to the following considerations:-

(i) the proposal should have no greater impact on the purposes of including land in the Green Belt than the existing development;

(ii) the proposal should not exceed the height of the existing buildings;

(iii) the proposal should not lead to a major increase in the developed proportion of the site;

(iv) the proposal should be ancillary to, or support, an existing or approved use on the site;

(v) proposals should respect the design of existing buildings and should not detract from the appearance of the site;

(vi) proposals should not lead to any significant increase in motorised traffic generation.
Complete or partial redevelopement on these sites should:

a) have no greater impact than the existing development on the openness of the Green Belt and the purposes of including land in it, and where possible less;

b) contribute to the achievement of the objectives for the use of land in the Green Belts set out in PPG2;

c) not exceed the height of the existing buildings;

d) not occupy a larger area of the site than the existing buildings (unless this would achieve a reduction in height which would benefit visual amenity) and;

e) should not lead to any significant increase in motorised traffic generation or unduly impact on the amenities of adjacent properties.

13.5 If a Listed Building is on the site consideration will need to be given to the impact of any proposed development upon it and if it would detract from the appearance or setting of the Listed Building the proposal will not be allowed. If a proposal results in the relocation or introduction of a hardsurfaced area such as a car park or playground, and this is considered to have an adverse impact on the Green Belt, the proposal will not be allowed.

13.6 The submission of long term plans for these major developed sites to help guide their successful development will be encouraged. Where redevelopment is proposed a planning brief may be prepared. The development and implementation of Green Transport Plans for Major Developed Sites will be encouraged.

Hospital Sites

14.1 Since 1996 the Shenley Hospital site has been the subject of phased redevelopment. This is being regulated and controlled by the policies of the Planning Brief ‘Securing a good future for Shenley’ and the terms of the outline permission granted by the Secretary of State for the Environment and its accompanying legal agreements. The last phase of the development is being implemented.

Policy C19: Shenley Hospital

Hertsmere will ensure that the Shenley Hospital site as defined on the Proposals Map continues to completion in its new role for housing, retail, small business accommodation, and public open space. The detailed design, layout and form of the redevelopment will be controlled through:

(i) the policies of the planning brief ‘Securing a good future for Shenley’ (as amended) and any subsequent Development Briefs;

(ii) the terms of the outline planning permission granted under reference 10434/1 and its accompanying legal agreements; and

(iii) Hertsmere’s current car parking standards and the other relevant policies of this Plan.
4. GREEN BELT AND COUNTRYSIDE

4.6 Major Developed Sites

4.6.1 PPG2 advises that where major developed sites such as factories, water and sewage treatment works, and research and education establishments exist within the Green Belt, the Local Plan may seek to identify such sites and apply appropriate policies to them. As there is no precise definition given in PPG2, it is left to local planning authorities to define them, but they must be substantial. Such uses are generally well established and may provide important sources of local employment. Once such sites have been identified in an adopted local plan, then limited infilling or redevelopment, which meets the criteria in Annex C of PPG2, becomes appropriate development.

4.6.2 Limited infilling or redevelopment of these sites should have no greater impact on the Green Belt than the existing development; it should not lead to a significant increase in floor area or activity on the site; and should be required to meet current operational requirements rather than an expansion of the concern. Complete or partial redevelopment may offer the opportunity for environmental improvement, and should contribute to the objectives of having land in the Green Belt. Major Developed Site status does not mean that planning permission will automatically be granted for such development. Any proposal will, like any other application, be subject to all the policies contained within the Local Plan.

4.6.3 In East Hertfordshire there is also a strong restraint on inappropriate development in the Rural Area Beyond the Green Belt (Policies GBC2 and GBC3). The District Council considers that there should be a consistent approach to the remaining two thirds of the District and a policy framework that is no more restrictive than that for the Green Belt. It is, therefore, considered appropriate to identify similar sites within the Rural Area Beyond the Green Belt.

4.6.4 The District Council has identified Major Developed Sites, on the basis of the following criteria: - size (footprint, levels of activity, e.g. number of students, employees and/or visitors), planning unit; planning history; and their capacity to accommodate infill development without compromising the purposes of the Green Belt or its openness, or the character of the Rural Area Beyond the Green Belt.

4.6.5 These sites are listed in paragraphs 4.6.6 and 4.6.7 below and are identified on the Proposals Map. For each site a boundary has been drawn defining the area, within which limited infill development or redevelopment may occur. Policy GBC7 below outlines the circumstances under which such development may occur. However, a number of the sites are also of considerable environmental interest either through being listed buildings or because they adjoin areas of national nature conservation importance. In such cases, policies contained within Chapter 8 (Environment and Design) and Chapter 9 (Built Heritage) should also be referred to.
4.6.7 The following sites within the Rural Area Beyond the Green Belt are identified and delineated on the Proposals Map as Major Developed Sites:

- Former GlaxoSmithKlein site, Bury Green
- St. Edmund's College and St. Hugh's School, Old Hall Green
- St. Elizabeth's Centre, South End, Much Hadham
- Freman College, Buntingford

4.7 Housing in the Countryside

4.7.1 The Housing Provision Strategy directs development to the main settlements, with limited small scale and/or infill development being directed to villages identified in the Village Development Strategy. This is discussed in more detail in Chapter 3 (Housing) and Chapter 17 (Other Settlements - The Villages). Changes in agricultural production methods and a declining agricultural workforce mean that the need for additional agricultural dwellings outside the settlements is increasingly rare. There may, however still be circumstances where additional essential accommodation is required and these will be assessed in accordance with Policy GBC8 and the criteria in Annex A of PPS7. In very exceptional circumstances there may be a need for residential accommodation to accompany other rural-based enterprises. In these circumstances proposals will be expected to meet the same stringent criteria as for agricultural and forestry housing.

4.6.5 The following sites within the Green Belt are identified and delineated on the Proposals Map as Major Developed Sites:

- Merck Sharpe and Dohme, Terlings Park
- Hayters plc, Spellbrook
- Haileybury and Imperial College, Hertford Heath
- Former University of Hertfordshire, Balls Park, Hertford
- Simon Balle School, Ware
- Presdales School, Ware
- Leventhorpe School, Sawbridgeworth
- Sele School, Hertford
- Van Hall's Garden Centre, Great Amwell
- Rye Meads Sewage Works, Stansted Abbotts

4.6.6 The following sites within the Green Belt are identified and delineated on the Proposals Map as Major Developed Sites:

(I) Limited infilling at Major Developed Sites will amount to appropriate development provided that such infilling:

(a) has no greater impact than the existing development on the purposes of including land in the Green Belt or on the character of the Rural Area Beyond the Green Belt;

(b) does not exceed the height of the existing buildings;

(c) will not lead to a major increase in the developed proportion of the site.

(II) Redevelopment or partial redevelopment of a Major Developed Site should be accompanied by a planning brief and landscape scheme and:

(a) should have no greater impact than the existing development on the purposes of including land in the Green Belt or on the character of the Rural Area Beyond the Green Belt;

(b) sites within the Green Belt should make a positive contribution to the achievement of the aims and objectives listed in paragraph 4.1.1 of this Local Plan;

(c) sites within the Rural Area Beyond the Green Belt should make a positive contribution to the aims and objectives listed in paragraph 4.1.1 of this Local Plan;

(d) should not exceed the height of the existing buildings;

(e) should not occupy a larger area of the site than the existing buildings (unless this would achieve a reduction in height, which would benefit visual amenity).

(II) In all cases new dwellings must be sensitively designed and sited to minimise the impact of the building on the character and appearance of the countryside.
APPENDIX 3

PROPOSED MAJOR DEVELOPED SITE BOUNDARIES
Three Rivers District Council
LDF

Merchant Taylors' School:
Major developed site

PROJECT TITLE

CHARTERED ARCHITECTS AND TOWN PLANNERS

STERLING COURT NORTON ROAD STEVENAGE HERTS

TELEPHONE: 01438 316331 FAX:01438 722035

PROJECT No. 4874

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