



Dacorum Borough Council

Local Planning Framework

DACORUM CORE STRATEGY EXAMINATION IN PUBLIC

Statement by Dacorum Borough Council

**Issue 2: The Distribution of Development (Settlement
Hierarchy) and the Green Belt**

September 2012

Purpose of this statement

The purpose of this statement is to summarise the Council's position regarding the following issues raised by the Inspector in advance of their discussion at the public hearing sessions.

To avoid repetition this statement includes cross references to appropriate technical work and includes relevant extracts as appendices.

Matters raised by Inspector

- 2.1 What evidence led to the inclusion of each of the settlements within each category (Table 1)? Does the sustainability appraisal support the chosen hierarchy?
- 2.2 Is the site selection process based on appropriate criteria?
- 2.3 What is the justification for holding local allocations in reserve? What will be the process for bringing forward their release and is it set out in sufficient clarity?
- 2.4 Have the proposed amendments to the green belt boundary been properly justified and has the Council's approach heeded national guidance? What are the exceptional circumstances that exist to justify such revisions?
- 2.5 Paragraph 83 of the National Planning Policy Framework refers to the permanence of the green belt in the long-term so that they should be capable of enduring beyond the plan period and paragraph 85 refers to the identification of safeguarded land. How does the Core Strategy address the possible need to safeguard land? Should a review of the complete green belt boundary have been undertaken, including an assessment of whether or not there are any major developed sites (other than those in Table 2) that should be identified? Can the Council be confident that the green belt boundary will not have to be altered at the end of the plan period?
- 2.6 How and when will settlement boundaries be reviewed?
- 2.7 Should limited infilling in selected small villages in the green belt be restricted to only affordable housing for local people? Paragraph 54 of the NPPF suggests that consideration be given to allowing some market housing to facilitate the provision of significant additional affordable housing. Should this approach be more clearly reflected in the Core Strategy?

Dacorum Borough Council's Response

- 2.1 What evidence led to the inclusion of each of the settlements within each category (Table 1)? Does the sustainability appraisal support the chosen hierarchy?**
 - 2.1.1 The settlement hierarchy and descriptions in Table 1 are based on the function and character of each settlement and potential scale of change which the settlement can reasonably absorb without undue detriment.
 - 2.1.2 The settlement hierarchy and Policy CS1: Distribution of Development is a long standing policy consistent with the Hertfordshire County Structure Plan (Examination Document REG1) (and thus is an approach which is consistent across Hertfordshire). The Structure Plan provided the strategic planning framework for the Dacorum Borough Local Plan 1991-2011.

2.1.3 The Core Strategy carries forward policy in the Dacorum Borough Local Plan 1991-2011 (Examination Document OT1). This identifies:

- Towns, i.e.
 - Hemel Hempstead (ref para 2.3 OT1)
 - Berkhamsted (ref para 2.4 OT1)
 - Tring (ref para 2.5 OT1)
- Large villages excluded from the Green Belt, i.e.
 - Kings Langley, Bovington and Markyate (ref paras 3.1-3.6 OT1)
- Small villages, i.e.
 - Chipperfield, Flamstead, Potten End and Wigginton in the Green Belt (ref paras 6.1-6.3 OT1)
 - Aldbury, Long Marston and Wilstone in the Rural Area¹ (ref paras 8.1-8.4 OT1).

2.1.4 The Structure Plan normally defined settlements of 7,000 people and above as towns. Large villages are defined in the DBLP 1991-2011 as having between 2,500 and 5,000 residents approximately. Small villages are significantly smaller.

2.1.5 The identification of small villages emanated from a rural settlements study, which looked at the presence of local services and facilities, e.g. church, village hall, school, shop and public house.

2.1.6 The development of settlement policy for the Dacorum Borough Local Plan is outlined in Chapter 3 of the Green Belt and Settlements Technical Report (Examination Document OT10). The policy (i.e. Policies 2, 3, 6 and 8 in the Local Plan – Examination Document OT1) was supported by an environmental appraisal (Paragraph 10, page 10, OT1) and subject to scrutiny at the public local inquiry.

2.1.7 This overall approach is considered to remain sound and neither technical work, feedback from consultation (Examination Document SUB6), Government policy contained within the NPPF or the Regional Plan (Examination Document REG7) indicate the need to significantly revise this longstanding approach.

2.1.8 Alternative approaches to distribution have been considered as part of the Issues and Options stage of the Core Strategy. These distributional options are summarised within the Sustainability Appraisal Report (Examination Document SUB 3), and updated by the Sustainability Report Addendum (Examination Document SUB7). See response to Issue 1: question 1.3 for a summary of the options considered.

2.1.9 The Regional Strategy distinguishes between Hemel Hempstead as a Key Centre for Development and Change (KCDC) and market towns (ref Policies SS3, SS4 and LA1 – Examination Document REG7). While the particular growth proposal at Hemel Hempstead and housing target were quashed after a judicial review, the Regional Strategy retained the designation for Hemel Hempstead. The Council refers to the town as the main centre for development and change in the Borough, which reflects its current function. As a New Town, Hemel

Hempstead has grown substantially since 1950s through addition of new neighbourhoods and other peripheral expansion. The town centre and Maylands Business Park have grown substantially - both are now identified by the Council as 'Key Regeneration Areas.' Focussing growth at Hemel Hempstead will assist this regeneration.

- 2.1.10 Technical work (e.g. HG7, HG9, HG14, ED6, ED13, ED8 and ED12) indicate that compared to Hemel Hempstead all other places have more limited development opportunity. While it is appropriate that towns are places where development should be concentrated the difference in scale between the market towns and Hemel Hempstead is large. Hemel Hempstead is four times bigger than Berkhamsted and seven times bigger than Tring. Berkhamsted and Tring are market towns with historic characters that have grown organically and are surrounded by attractive Chilterns countryside (and Green Belt). The Regional Strategy does not propose peripheral development at these market towns (ref Policy LA1 (3), REG7).
- 2.1.11 Berkhamsted and Tring are different in size from each other and would naturally be expected to accommodate different levels of development. At Berkhamsted, the Council is proposing the continuation of previous growth. Tring will accommodate a slightly lower rate than previously, but it is a smaller, more compact and constrained settlement. The large villages are surrounded by Green Belt and/or the Chilterns Area of Outstanding Natural Beauty and will naturally accommodate different levels of development. There are constraints on the development of all these settlements because of local infrastructure, their character and surroundings, as well as opportunities within the settlement boundary. Because the opportunity for general development is more constrained than at Hemel Hempstead, and given the clear focus on Hemel Hempstead, the Council concludes there is no reason why the overarching approach to the market towns and large villages should not be similar (i.e. as areas of limited opportunity).
- 2.1.12 The countryside is an area of development restraint. Local needs are usually directed to key settlements (i.e. small villages). Larger settlements also provide services and meet needs generated by their rural hinterlands.
- 2.1.13 Responses to questions under Issues 10-16 provide further detail regarding the particular issues and needs of the towns, large villages and wider countryside.
- 2.1.14 The community view supports the settlement strategy: i.e.
- focus development on Hemel Hempstead and support regeneration there:
 - conserve the countryside and Chilterns; and
 - ensure the scale and pace of change is sympathetic to its location
- (reported in the Report of Consultation Examination Document SUB6).
- 2.1.15 The sustainability appraisal supports the settlement hierarchy (ref Examination Document SUB3). Appendix E, pages E3-E5, appraises Policy 1 against the sustainability objectives. It concludes:

“The policy should provide a good balance between focusing development in the key settlements whilst allowing for demonstrated local needs to be met in smaller settlements and rural areas. The growth in key settlements will help to support certain regeneration needs in the towns and improve levels of community vitality, with associated social and economic benefits. It will also help to service the needs of surrounding areas. By concentrating growth in Hemel Hempstead and the other larger settlements the impacts on the Borough’s natural environment will be minimised.”

Note: ¹ Little Gaddesden was specifically excluded as a small village because of its particular linear character containing attractive open gaps which should remain (also see Table 12 in the Countryside Place Strategy)

2.2 Is the site selection process based on appropriate criteria?

2.2.1 The Core Strategy provides a framework for selection of development sites. This will primarily be taken forward by the Site Allocations DPD. There are two main elements:

- 1) using sites within defined settlements before urban extensions (i.e. Local Allocations) as a norm
- 2) applying all the criteria to assess the appropriateness of sites and what they should be used for.

2.2.2 Land within settlements which will be suitable for development includes previously developed land and buildings and greenfield land identified for development (in the current Dacorum Borough Local Plan) and future Development Plan Documents. The scale and density of development is likely to be higher in the more accessible locations of settlements. The Accessibility Zones for the Application of Car Parking Standards (Examination Document TR11) provides a guide to accessibility. The Council considers it reasonable that the identified greenfield land should come forward first before local allocations. The proposals relating to currently identified greenfield land have been subject to environmental appraisal and independent scrutiny through a Public Local Inquiry.

2.2.3 The Council is aiming to manage the supply of development land, especially for housing, over the plan period and beyond. Unrestricted release of greenfield land will affect regeneration opportunities, and unnecessarily damage the countryside and Green Belt. The Council does however accept that it will be necessary to allow greenfield land to come forward together with previously developed land opportunities throughout the plan period. New local allocations will be part of the defined settlement when they are removed from the Green Belt through the Site Allocations DPD. Policy CS3 will then manage the rate at which they should come forward.

2.2.4 The framework in Policy CS2: Selection of Development Sites, could be applied later in the plan period, if any further local allocations need to be identified (though this is not expected).

2.2.5 The criteria (a) – (f) within Policy CS2 accord with principles of sound planning

and reflect current Government policy and sustainability objectives. In essence, the choice of development sites should consider:

- i. accessibility [(a)]
- ii. environmental constraints [(b) and (d)]
- iii. whether land will be used effectively and fit with the settlement's development pattern [(c) and (e)]; and
- iv. accompanying infrastructure provision [(f)].

2.3 What is the justification for holding local allocations in reserve? What will be the process for bringing forward their release and is it set out in sufficient clarity?

2.3.1 Local Allocations are land which will be released from the Green Belt. Six local allocations are indicated in the Core Strategy and will be delineated in the Site Allocations DPD.

2.3.2 The Council has operated a land reserve policy for 20 years i.e. in the Dacorum Borough Local Plan and its review, the Dacorum Borough Local Plan 1991-2011 (Examination Document OT1). Policy 17 of the Dacorum Borough Local Plan 1991-2011 has controlled housing land supply more recently: the principal reasons are set out in paragraphs 17.1 -17.4. The land reserve policy has been subject to scrutiny and Inspectors' support through local public inquiries.

2.3.3 The NPPF states that exceptional circumstances must be demonstrated to allow release of land from the Green Belt. Over a long plan period, land will be needed for development towards the end of the plan period as well as earlier. The local allocations are not needed now, but they are expected to be required within the plan period. And therefore they will be released. If the Council fail to manage the supply of Green Belt releases they will be failing to protect the Green Belt and its functions. The loss of countryside will come much earlier than necessary and urban regeneration will be affected. Other greenfield land (some former Green Belt releases) is available now, as part of the development land supply.

2.3.4 A land reserve policy is important in an area subject to significant environmental constraints and development pressures. It helps:

- (a) maintain a steady supply of land
- (b) reduce impacts on existing communities; and
- (c) key providers plan for the successful integration of development with infrastructure, for example, sewerage infrastructure at Hemel Hempstead and primary school provision.

2.3.5 The normal process for bringing a local allocation forward will be to:

- follow the date to be set out in the Site Allocation DPD
 - the Council currently does not consider that any of the local allocations need to be released before 2021, but that is a matter for further testing.
- Complete a master plan in collaboration with landowners alongside the Site Allocation DPD (and with public consultation)
 - this will speed up the process from planning application to

development on site

- Maintain liaison with landowners through land availability monitoring and Annual Monitoring Reports, and with infrastructure providers through monitoring and the infrastructure deliver plan (IDP) process
 - this will ensure all parties are informed and collaboration continues.

2.3.6 In setting the release dates, the Council will have regard to factors (a) – (c) within Policy CS3: Managing Selected Development Sites (i.e. infrastructure availability, need for a particular development or its particular local benefits, as well as the overall supply of land – normally, but not only, for housing).

2.3.7 The Council accepts that over a long plan period circumstances could change and factors (a) to (c) can be considered afresh. Unless there is a particular, insurmountable infrastructure issue (which is not anticipated), local circumstances are more likely to suggest a local allocation can come forward a little earlier.

2.3.8 The overall supply of housing is a factor and it is possible Policy CS17: New Housing could be relevant. In maintaining housing supply over the plan period, the Council may have to consider remedial action if the housing target and trajectory is not being met. One course of action, but not the first choice, is bringing a local allocation forward earlier. Use of public land, the unblocking of sites or other pump priming or investment may be possible.

2.3.9 Minor change MC26 (see Examination Document SUB5) amends paragraph 14.15 in the Core Strategy: it considers options available to address any housing land supply shortage and the possible role of local allocations in that. Such circumstances and decisions would be reported through the Annual Monitoring Report.

2.3.10 The policy is and will be clear, both in the Core Strategy and Site Allocations DPD.

2.4 Have the proposed amendments to the green belt boundary been properly justified and has the Council's approach heeded national guidance? What are the exceptional circumstances that exist to justify such revisions?

2.4.1 The fundamental aim of Green Belt policy is to protect urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. A large part of the borough is covered by the Metropolitan Green Belt (although this merges with the Luton / South Bedfordshire Green Belt in the Markyate area). Boundaries have been reviewed a number of times since the first County Development Plan (approved 1958).

2.4.2 The current boundaries are established in the Local Plan (Examination Document OT1), and therefore should only be altered in exceptional circumstances. If the Council was to maintain current average housing provision in the Local Plan (i.e. 360 dwellings per annum), no release would be required. The Hertfordshire County Structure Plan 1998 (Examination

Document REG1) diverted growth pressure away from the district because of the extent of Green belt and Area of Outstanding Natural Beauty.

2.4.3 In the absence of a housing target in the Regional Strategy (this was quashed by a High Court judgement in July 2009), the Council was left to determine its own. The Council has therefore considered what a reasonable target would be, taking a balanced view of objectively assessed needs for housing and other development, and other factors (see Examination Document HG16: Selecting the Core Strategy Housing Target). The Council has concluded that the appropriate target is 430 dwellings per annum and the only way this can be achieved under current Government policy guidelines is through the release of Green Belt land.

2.4.4 Potential local allocations (i.e. releases of land from the Green Belt) have been assessed on a range of factors, including sustainability and Green Belt policy (Examination Document HG15). There is clearly an impact on the Green Belt. The Council has assessed that impact in relation to the five purposes of Green Belts (paragraph 80 of the National Planning Policy Framework) and selected sites which overall it judges to have lesser impact. While boundaries have yet to be delineated in the Site Allocations DPD, recent work with landowners of the local allocations confirms that boundaries can be set, with suitable landscape strategies, to limit the impact.

2.4.5 Boundaries can therefore be defined using physical features that are readily recognisable and likely to be permanent. Structural planting will be required in places to reinforce a boundary (e.g. on LA1 at Marchmont Farm, which follows advice from the previous Local Plan Inquiry Inspector: Examination Document OT9).

2.4.6 All local allocations would include housing and related development. LA5 (Icknield Way, West of Tring) also includes some employment space, an expansion of Icknield Way General Employment Area. This is recommended in the Employment Space Study (Examination Document [***](#), page [*****](#)). It would provide new business space and assist the process of regeneration (and redevelopment of employment land) in the town.

2.5 Paragraph 83 of the National Planning Policy Framework refers to the permanence of the green belt in the long-term so that they should be capable of enduring beyond the plan period and paragraph 85 refers to the identification of safeguarded land. How does the Core Strategy address the possible need to safeguard land? Should a review of the complete green belt boundary have been undertaken, including an assessment of whether or not there are any major developed sites (other than those in Table 2) that should be identified? Can the Council be confident that the green belt boundary will not have to be altered at the end of the plan period?

2.5.1 National Green Belt policy is longstanding. Paragraphs 83 and 85 of the

National Planning Policy Framework essentially continue the policy that:

- it is important to establish long term boundaries of the Green belt that last beyond the plan period;
- boundaries should only be altered in exceptional circumstances and then through revisions in the Local Plan (and normally strategic guidance);
- Local planning authorities should satisfy themselves that boundaries will not need to be altered at the end of the plan period;
- this will in some cases mean safeguarding land between the urban area and the Green Belt which may be required to meet longer term development needs;
- this will in some cases mean safeguarding land between the urban area and the Green belt which may be required to meet longer term development needs.

(see paragraphs 2.7 and 2.12 in PPG2: Green Belts, Examination Document REG20).

2.5.2 The Hertfordshire County Structure Plan (Examination Document REG1) required an inner Green Belt review at Hemel Hempstead (Policy 8) and suggested limited peripheral development may be appropriate at other settlements (Policy 7, paragraph 131). When preparing the Dacorum Borough Local Plan 1991-2011 the Council reviewed the Green Belt: it also considered anomalies in the boundary and policy on major developed sites (this was the second time in ten years – the first came through the original Dacorum Borough Local Plan adopted in 1995). Boundary changes were proposed to accommodate additional housing development. However the Plan did not propose safeguarded land (though it had a land reserve policy). The Inspector concluded this was a reasonable approach in an environmentally constrained area such as Dacorum.

2.5.3 The Regional Strategy (Examination Document REG7) emphasises the retention of long standing Green Belt restraint (Policy LA1) and proposes no strategic Green Belt review. That proposed at Hemel Hempstead was quashed by a High Court judgement in July 2009.

2.5.4 The Council has considered whether safeguarding land for future development beyond the plan period is necessarily an environmentally-friendly policy or particularly intelligible to local communities. There are inevitable unanswered questions:

- what is the level of development that is being sought?
- has the Council been able to consider practical alternatives?
- what is the strategic policy or policy of co-operating authorities beyond 2031?

2.5.5 The planning authorities within the Metropolitan Green Belt note the general importance the Government attaches to the Green Belt (Paragraph 79 of the NPPF). Given that importance, the Council expects the Government to support authorities which attempt to divert growth away from the Metropolitan Green belt and which use previously developed land as effectively as possible. The Council has considered whether releasing land from the Green Belt now – even as ‘white land’ – will extend the permanence of the Green belt and long term

boundaries. In the Council's judgement it will tend to do the opposite and guarantee that change, probably at an earlier rather than later date, because of understandable pressure from the development sector (notwithstanding the fourth bullet point in paragraph 85 of the NPPF). Furthermore, safeguarding land in the Core Strategy will not guarantee that more land will be required to be removed from the Green belt at the next review.

2.5.6 The boundaries set by the Council will last until at least 2031. This is beyond the normal 15 year housing land requirement. The plan period itself is 25 years.

2.5.7 It is not unusual in Dacorum for unexpected large windfall sites which are likely to boost supply (these have not been taken into account in housing supply calculations, despite the comprehensive approach of housing land availability studies). Significant regeneration initiatives will expend beyond 2013, particularly in Hemel Hempstead New Town.

2.5.8 The Council has concluded that safeguarded land does not need to be identified. The test in paragraph 85 of the NPPF is whether it is *necessary*:

- future demand is uncertain;
- the plan period is already long;
- none of the local allocations is of a major scale: only West Hemel Hempstead would logically be built over more than five years.

2.5.9 The Council has considered a wide range of potential local allocations (Examination Document HG15) and growth scenarios at Hemel Hempstead (Examination Document HG10). In doing so, it has considered future directions of growth and its implications. Discussion at the Place Workshops was also wide ranging (refer to Volume 3 of the Report of Consultation, Examination Document SU36).

2.5.10 If future demands require the release of Green belt land after 2031 the Council conclude that the best option will be to use land east of Hemel Hempstead. This would be a logical extension of the town up to the M1 motorway. The land is however within ST Albans district. The Council has not therefore explicitly stated its preference in the Core Strategy.

2.5.11 In response to the representor supporting housing / business expansion into St Albans district, the Council has said "*The development needs identified in the Core Strategy can be met within Dacorum. The Council is working with St Albans Council over the planning of East Hemel Hempstead. It agrees with that authority that there is no good reason at present to roll the Green belt boundary back to the M1. The issues that need to be resolved using land in St Albans are mostly compatible with Green belt designation. The Council considers that what is planned to 2031 should allow for possible future extension of the town in the Woodhall Farm area. If and when Hemel Hempstead is required to expand, this area would be the Council's first choice.*" (Report of Representations, Examination Document SUB5, page 57).

2.5.12 The Council has reviewed the list of Major Developed Sites (MDS) within the current Dacorum Borough Local Plan. It has concluded that all current sites

should retain the MDS designation. As part of this review, the British Film Institute has been added to the list to reflect the role it plays as a local employer, its national significance to the arts and its requirements to maintain and upgrade existing buildings. Paragraph 8.31 of the Pre-Submission Core Strategy sets out the criteria used for designation. The need for further additional designations can be considered through the Site Allocations DPD.

2.5.12 The Council has undertaken a thorough review of Green Belt policy and boundaries – particularly as it has applied to sites. Precise boundaries will be changed in the Site Allocations DPD following the identification of local allocations. Major developed sites are identified in the Core Strategy – again the Site Allocations DPD can review boundaries. The role of the Core Strategy is to take the main decisions. Minor anomalies can be changed through the Site Allocations DPD: these will be few, if any.

2.6 How and when will settlement boundaries be reviewed?

2.6.1 The towns and large villages are set within the Green Belt¹. Their boundaries are therefore co-terminus with the Green belt. The issue for settlement boundaries is whether there are exceptional circumstances to change the Green Belt boundary. Given boundaries should be defined for their permanence, there are few reasons for change – either:

- development needs which are signalled by local allocations; or
- minor corrections.

2.6.2 Changes will be delineated in the Site Allocations DPD: the Pre-Submission stage is programmed for Spring 2013. A significant amount of work has been undertaken on the Site Allocations and there have been two public consultations. Until 2009 when the Emerging Core Strategy was published, the two DPDs paralleled each other.

2.6.3 The boundaries of small villages – whether village ‘envelopes’ for the purposes of Policy CS6 or the boundaries of Rural Area villages under Policy CS7 – are being reviewed with the Site Allocations DPD. Any change should be relatively minor: it should relate to the needs of that particular village and the delivery of the Countryside housing objective (set out in the Countryside Place Strategy), of 420 dwellings in the plan period. See also the response to Issue 16: question 16.5 regarding Wilstone.

Footnote ¹ Markyate’s northern and western boundaries adjoin the Chilterns Area of Outstanding Natural Beauty, not the Green Belt.

2.7 Should limited infilling in selected small villages in the green belt be restricted to only affordable housing for local people? Paragraph 54 of the NPPF suggests that consideration be given to allowing some market housing to facilitate the provision of significant additional affordable housing. Should this approach be more clearly reflected in the Core Strategy?

- 2.7.1 Replacement of buildings and conversions are permitted for market housing. New build housing on a garden or other open land is permitted for affordable housing for local people. Policy CS6 continues the policy in the Local Plan (Examination Document OT1) and the Council considers this approach remains appropriate.
- 2.7.2 The Council has noted that the NPPF (and its draft) says local planning authorities should *consider* whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs. This consideration can apply across any part of the countryside. It is not a requirement. MC27 proposes that on rural sites (under Policy CS20) 100% of all new homes will *normally* be affordable. This is a softening of the previous position that all homes should be affordable and will create an element of flexibility.
- 2.7.3 Rural sites can be designated in the Site Allocations DPD and possibly through a relevant Neighbourhood Plan. The Council will use the Site Allocations DPD as far as possible and continue liaison with parish council and the rural housing enabler. Affordable housing proportions can be stated in the Site Allocations DPD.
- 2.7.4 The issue for most rural housing land designation is economics: raising land values on the hope of market housing makes that delivery more difficult. The danger is that eventually 65% market housing will be deemed appropriate to support 35% affordable housing, as it is in urban areas. The scale of development would mean a very much greater environmental impact – both direct in land take and indirect of know demands and activity (e.g. traffic).
- 2.7.5 Any infilling affects the openness of the Green Belt. Insofar as infilling by general market housing occurs, it squeezes out affordable homes (to other sites in and around a village): the environmental affect of the Green Belt is thereby increased. The Council's policy has consistently been to limit development in the Green Belt.
- 2.7.6 The amount of new affordable housing available by relaxing the policy on infilling is relatively small. Infilling would normally only be by 1 or 2 units. It is arguable whether the Council would achieve any more than a financial contribution from such development. It would then be put towards the development of an affordable housing site elsewhere. The Council has concluded that the limited housing gain does not warrant the environmental effect.
- 2.7.7 Furthermore, infilling is opposed by the community at large (refer to Report of Consultation, Examination Document SUB6, Volume 4, Annex A, page 22) because of its effects on the character of the Green Belt and its villages.