

Hertsmere Borough Council
Green Belt Assessment Stage 2
Green Belt Assessment Stage 2 -
Additional Sites

ISSUE | 5 March 2020

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 272956-00

Ove Arup & Partners Ltd
13 Fitzroy Street
London
W1T 4BQ
United Kingdom
www.arup.com

ARUP

Contents

	Page
1	Scope of additional work
1	1
2	Methodology
2	2
2.1	Step 1: Area Identification
2.1	3
2.2	Step 2: Sub-area Boundary Definition
2.2	3
2.3	Steps 3 - 6
2.3	3
3	Findings
3	7
3.1	Purpose 1 Assessment: To check the unrestructured sprawl of large built-up areas
3.1	7
3.2	Purpose 2 Assessment: To prevent neighbouring towns from merging
3.2	7
3.3	Purpose 3 Assessment: To assist in safeguarding the countryside from encroachment
3.3	10
3.4	Purpose 4 Assessment: To preserve the setting and special character of historic towns
3.4	10
3.5	Strategic Green Belt Assessment
3.5	10
3.6	Boundary Consideration
3.6	14
3.7	Categorisation
3.7	14
4	Recommendations
4	16
4.1	Sub-area recommendations
4.1	16
5	Conclusions
5	23

Appendices

Appendix A

Site Pro formas

1 Scope of additional work

Arup has been appointed by Hertsmere Borough Council (HBC) to undertake a further Stage 2 Green Belt Assessment for three additional sites. This study aligns in methodology and detail with the earlier Green Belt Assessment Stage 2 (GBA Stage 2), also undertaken by Arup.

The purpose of this GBA Stage 2 Additional Sites review was to provide evidence from a more refined and focussed assessment of the potential sites against the Green Belt criteria, as set out in the National Planning Policy Framework (2019)¹ (NPPF). The assessment evaluated how well the three sites meet the five Green Belt purposes set out in the NPPF and made recommendations for their future designation in the Local Plan process. HBC may take the findings of the assessment into account alongside other evidence in making decisions about their Local Plan housing and employment location strategy and site allocations.

The additional sites were not originally assessed as part of the GBA Stage 2 assessment. They were identified during the December 2018 'Potential sites for housing and employment' engagement² which followed the completion of the GBA Stage 2 commission. A decision to assess these three additional sites was made to ensure that HBC has made every effort to consider appropriate land to meet identified housing and employment need, leaving 'no stone unturned'.

The report is structured as follows:

- Section 2 sets out the methodology;
- Section 3 presents the key findings and recommendations for the GBA Additional Sites assessment;
- Section 4 provides recommendations for the additional sites; and
- Section 5 draws together the conclusions.

Appendix A presents the assessment pro-formas for each of the three sites.

¹ National Planning Policy Framework (2019) available here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

² Hertsmere Borough Council Local Plan - Local Development Framework available here:

<https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/Local-development-scheme-2019.pdf>

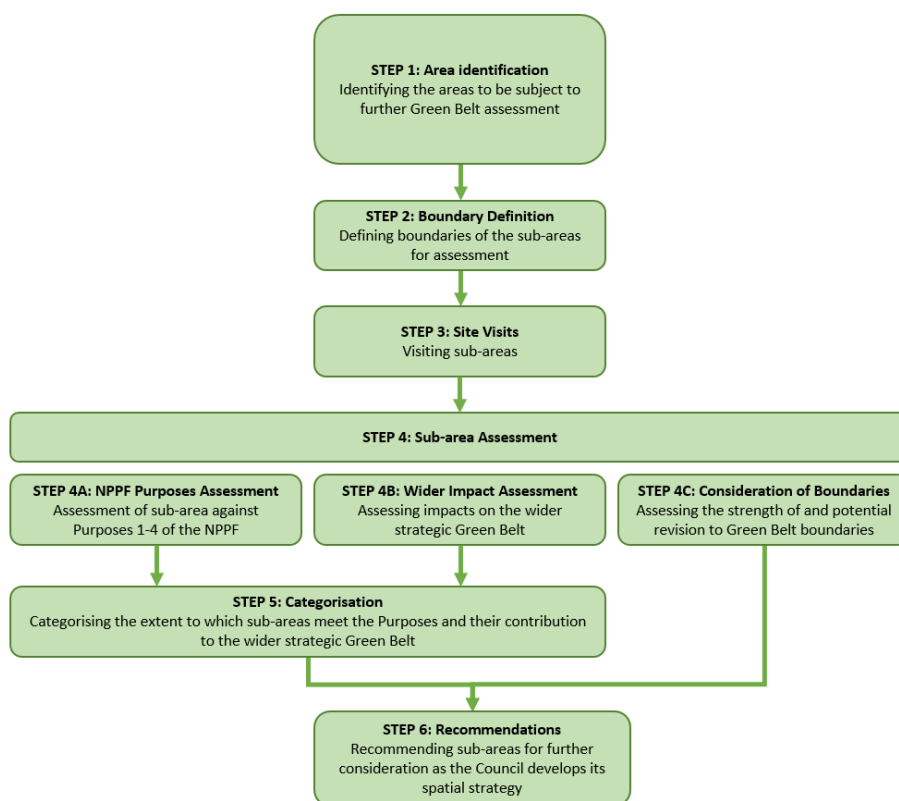
2 Methodology

The approach taken to assessing the additional sites is consistent with the methodology set out in the GBA Stage 2 report, section 3³. This involves a more focussed and finer grain assessment of sub-areas following the Stage 1 assessment of the whole Green Belt against the five purposes set out in the NPPF. The full alignment with the GBA Stage 2 methodology ensures consistency of assessments and the comparability of recommendations for all sites being considered for allocation. The methodology for GBA Stage 2 was previously consulted on with duty to cooperate partners.

The process involved the following, (illustrated in Figure 2.1):

- Mapping and boundary definition of the three sites;
- Site visits; and
- Assessment of sites against the NPPF purposes and strategic Green Belt role.

Figure 2.1: GBA Stage 2 Methodology Diagram



³ The full GBA Stage 2 report is available here: <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/Green-Belt-Assessment-2-DRAFT-Final-Report.pdf>

2.1 Step 1: Area Identification

Following the completion of the GBA Stage 2 study, the Council held a consultation event during December 2018, during which the public proposed sites for potential allocation in the emerging Local Plan. The Council identified that three of these sites are in areas not covered in the Stage 2 GBA. Thus for completeness, the Council requested that an additional Stage 2 assessment be undertaken for these sites. Figure 2.2 shows the location of three sites for additional assessment.

The sites were filtered against major policy constraints (as defined in the GBA Stage 2 report).

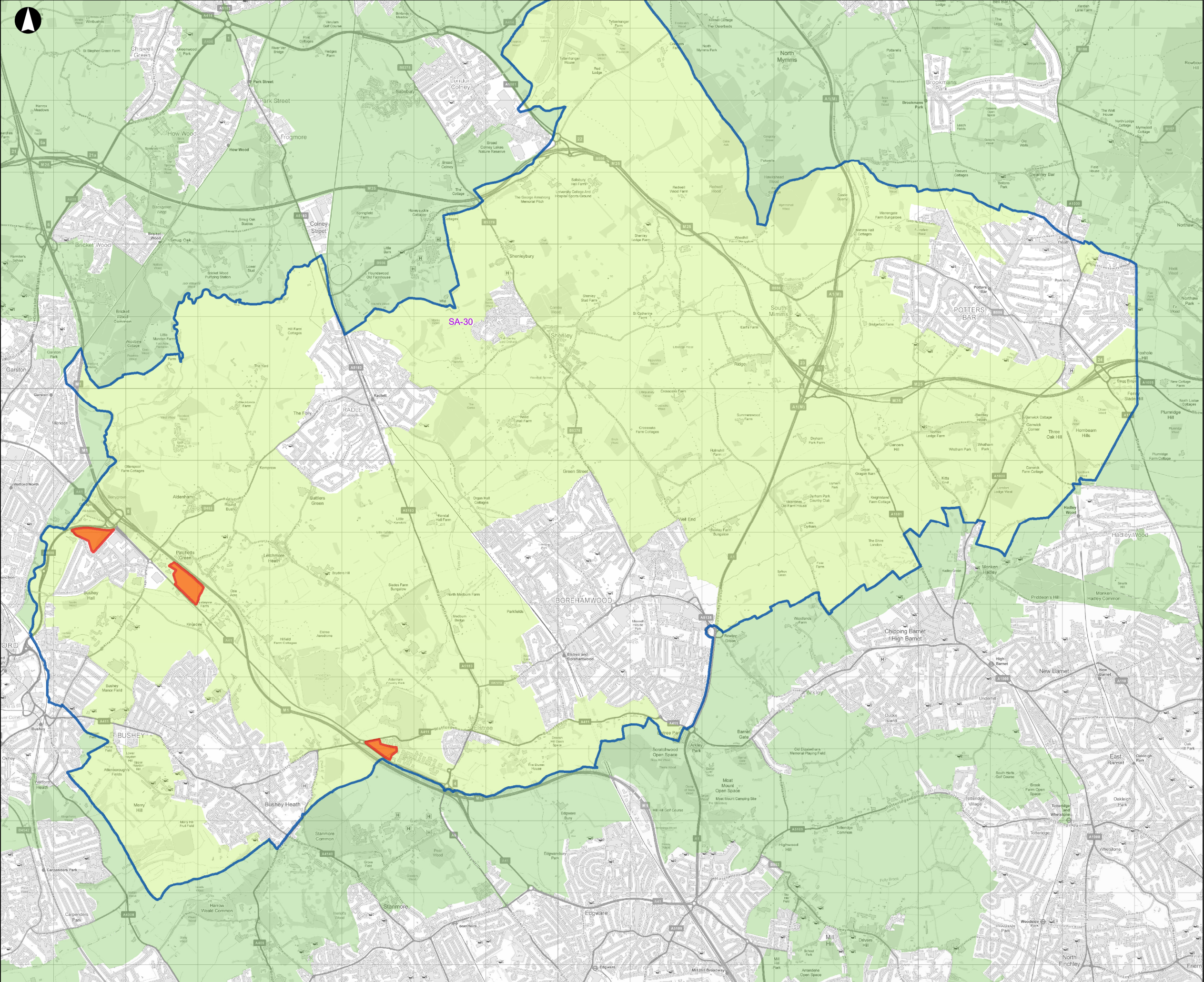
2.2 Step 2: Sub-area Boundary Definition

Step 2 involved defining suitable boundaries for the assessment areas (i.e. sub-areas), which are defensible against policy. Paragraph 139 of the NPPF for Green Belt requires boundaries to be defined '*clearly, using physical features that are readily recognisable and likely to be permanent*', it is therefore logical to define assessment sub-areas to reflect this principle from the outset. This approach was also used in the Stage 2 GBA.

Sub-area boundaries were defined on the basis of a desk-based assessment using the same features as the GBA Stage 2 assessment, i.e. permanent and defensible boundary features, both man-made and natural including motorways, A and B roads, railway lines, the back of residential properties and gardens, and rivers. The suitability and strength of the boundaries was reviewed on site and amended as necessary. Each sub-area was assigned a unique reference number (Figure 2.3).

2.3 Steps 3 - 6

The additional sub-areas were assessed using the same methodology as the GBA Stage 2 sub-areas. The full methodology for these steps is set out in GBA Stage 2 report and is not repeated here. Figure 2. shows the Green Belt Parcels (Stage 1), Sub-areas (Stage 2), Garden Village Sites and Additional Sub-areas for assessment.

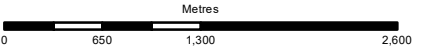


Legend

- Additional Sites
- Hertsmere Borough Boundary
- Hertsmere Green Belt
- Neighbouring Green Belt

Contains OS Data
© Crown copyright and database rights 2016 OS EUL 100017428

P1	10-10-18	IJ	EW	KF
Issue	Date	By	Chkd	Appd



ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Hertsmere Borough Council

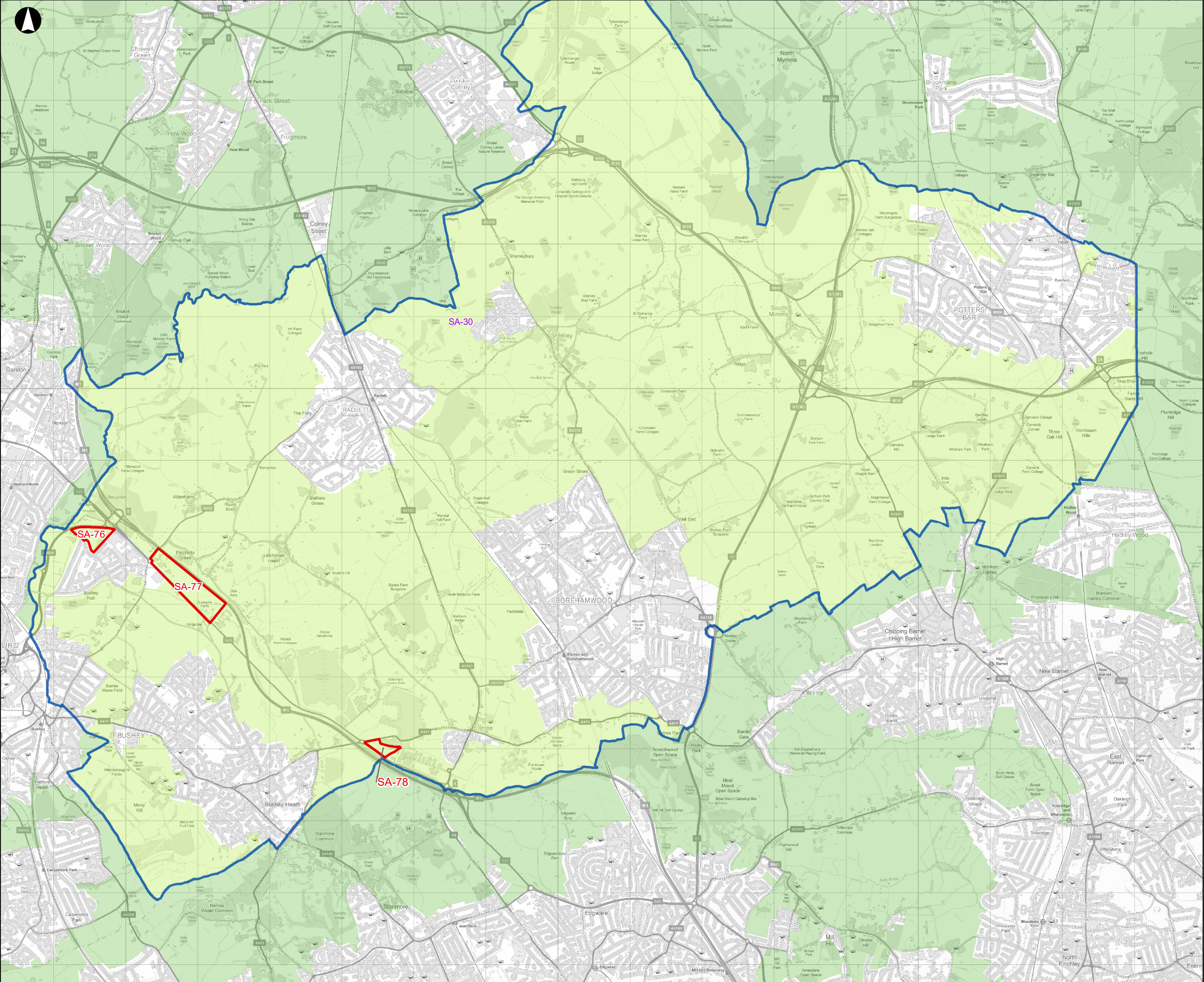
Job Title
**Hertsmere Green Belt Assessment Stage 2
- Additional Sites**

**Figure 2.2:
Additional Sites for Assessment**

Scale at A3

1:50,000

Job No 272956-00	Drawing Status Issue
Drawing No 2.2	Issue No P1



Legend

Additional Sub-Areas

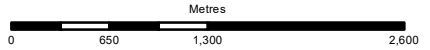
Hertsmere Borough Boundary

Hertsmere Green Belt

Neighbouring Green Belt

Contains OS Data
© Crown copyright and database rights 2016 OS EUL 100017428

P1	10-10-18	IJ	EW	KF
Issue	Date	By	Chkd	Appd



ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

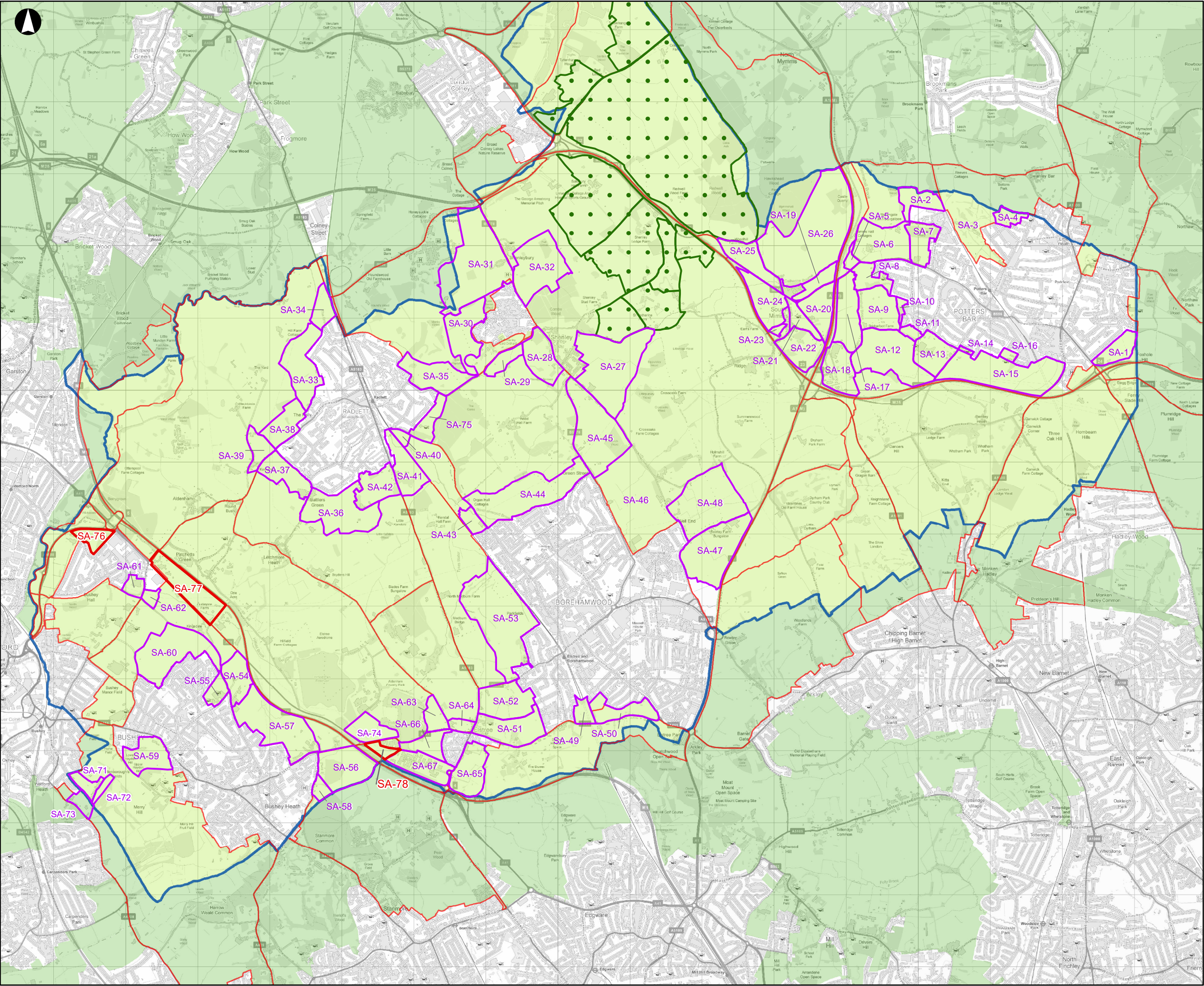
Client
Hertsmere Borough Council

Job Title
**Hertsmere Green Belt Assessment Stage 2
- Additional Sites**

Figure 2.3:
Additional Sub-Areas for Assessment

Scale at A3
1:50,000

Job No 272956-00	Drawing Status Issue
Drawing No 2.3	Issue P1

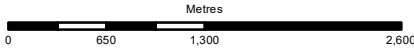


Legend

- Additional Sub-Areas
- Sub-Areas
- Garden Village Sites
- Green Belt Parcels
- Hertsmere Borough Boundary
- Hertsmere Green Belt
- Neighbouring Green Belt

Contains OS Data
© Crown copyright and database rights 2016 OS EUL 100017428

P1	10-10-18	IJ	EW	KF
Issue	Date	By	Chkd	Appd



ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Hertsmere Borough Council

Job Title
**Hertsmere Green Belt Assessment Stage 2
- Additional Sites**

**Figure 2.4: Hertsmere Green Bel
Parcels (Stage 1), Sub-Areas (Stage 2)
Garden Village Sites and
Additional Sub-Areas for Assessment**

Scale at A3
1:50,000

Job No 272956-00	Drawing Status Issue
Drawing No 2.4	Issue P1

3 Findings

This section summaries the key findings from the assessment of the three sub-areas against the NPPF purposes, consideration of the sub-area as part of the wider strategic Green Belt, and consideration of boundaries.

3.1 Purpose 1 Assessment: To check the unrestructured sprawl of large built-up areas

All three sub-areas scored 0 against Purpose 1, as shown in Table 3.1 and Figure 3.1. Borehamwood, located to the south of the borough, is the only settlement considered a large built-up area. All additional sites are located in the south-east of the borough and are not at the edge of Borehamwood large built-up area, either physically or perceptually. The sites do not directly prevent the outward spread of the settlement, therefore fail to meet Purpose 1.

Table 3.1: Purpose 1 Summary of Scores

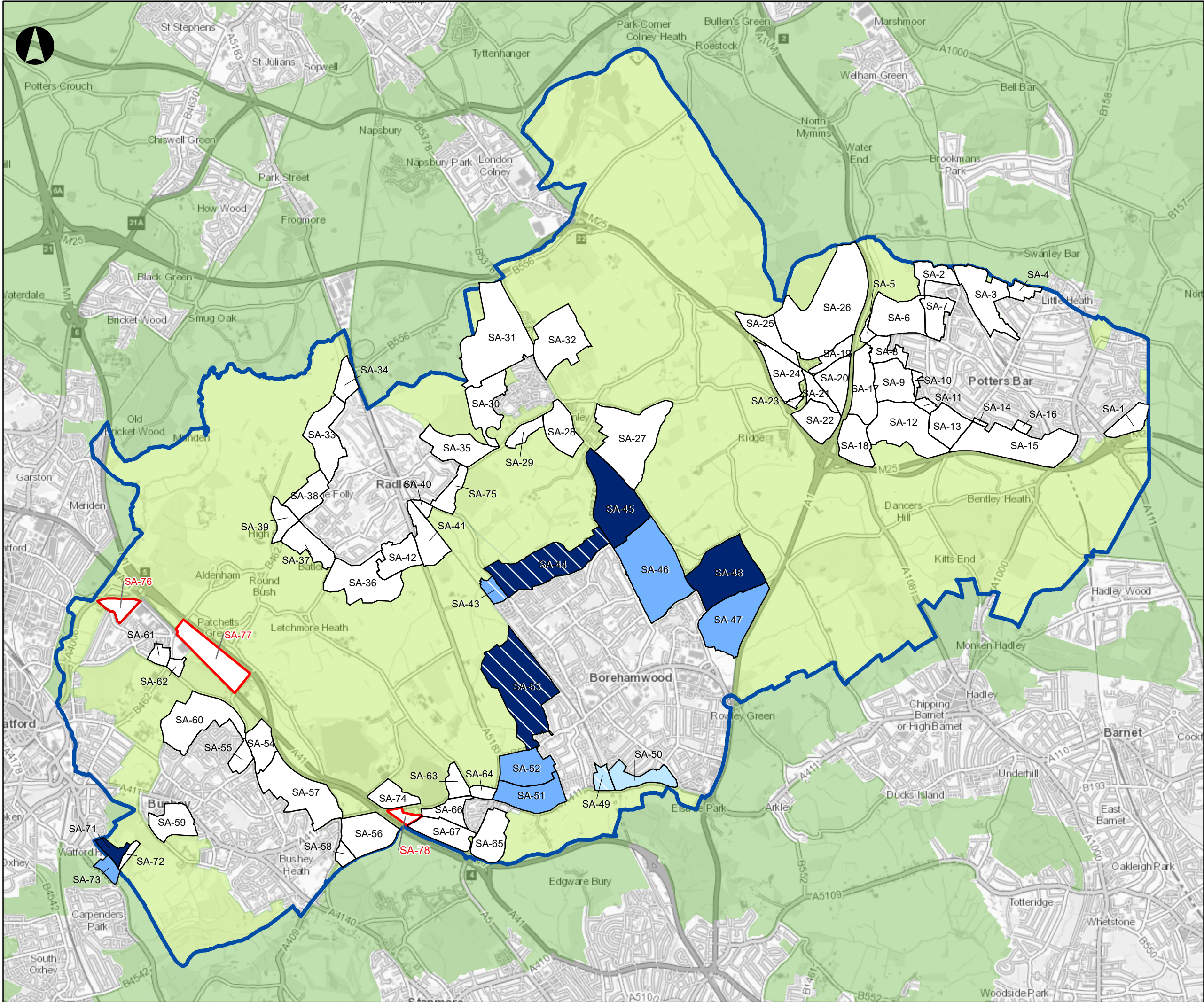
Sub-area	Purpose 1 Score
SA-76	0
SA-77	0
SA-78	0

3.2 Purpose 2 Assessment: To prevent neighbouring towns from merging

The sub-areas vary in strength against the Purpose 2 criteria, as shown in Table 3.2 and Figure 3.2, scoring moderately to weakly. This reflects the wider role the sub-areas play in preventing neighbouring settlements from merging, but where there may be scope for some development.

Table 3.2: Purpose 2 Summary of Scores

Sub-area	Purpose 2 Score
SA-76	1
SA-77	3
SA-78	1



Legend

Additional Sub-Areas

Purpose 1b Scores

0

1

1+

3

3+

5

5+

Sub-Areas

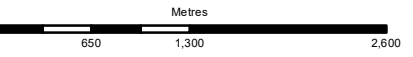
Hertsmere Boundary

Hertsmere Green Belt

Neighbouring Green Belt

Contains OS data © Crown Copyright and database right

P3	10-10-18	IJ	EW	KF
Issue	Date	By	Chkd	Appd



ARUP

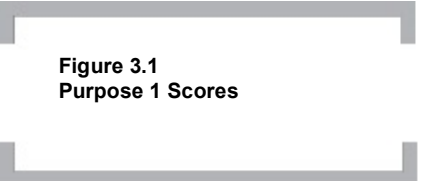
13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client

Hertsmere Borough Council

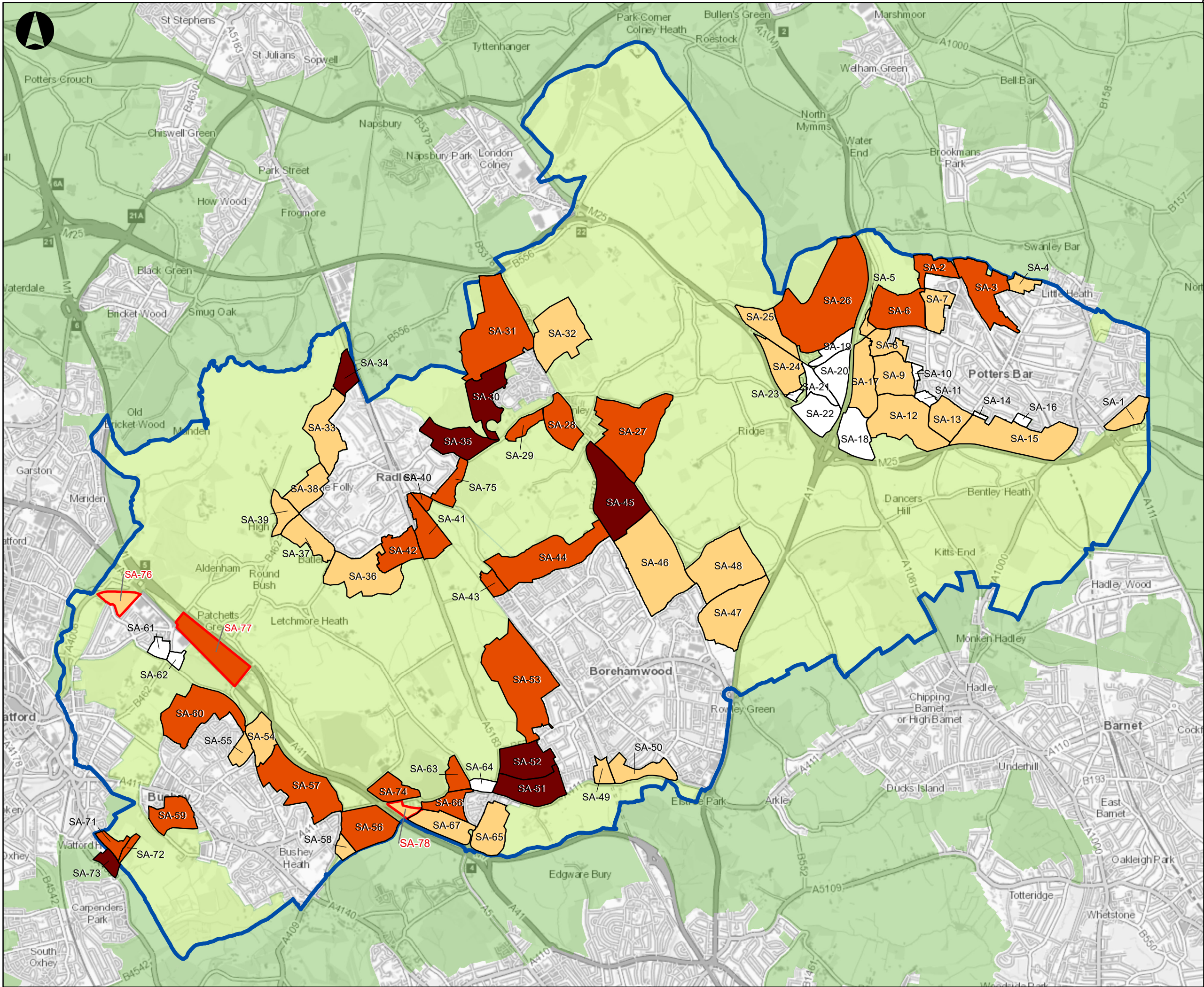
Job Title

**Hertsmere Green Belt Assessment Stage 2
- Additional Sites**



Scale at A3
1:50,000

Job No 272956-00	Drawing Status Issue
Drawing No 3.1	Issue P3



Legend

 Additional Sub-Areas

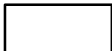
Purpose 2 Score

 0

 1


 3

 5

 Sub-Areas

 Hertsmere Boundary

 Hertsmere Green Belt

 Neighbouring Green Belt

Contains OS data © Crown Copyright and database right 2019

P2	11-10-18	IJ	EW	KF
----	----------	----	----	----

Issue	Date	By	Chkd	Appd
-------	------	----	------	------

Metres
0 650 1,300 2,600

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Hertsmere Borough Council

Job Title
**Hertsmere Green Belt Assessment Stage 2
- Additional Sites**

**Figure 3.2
Purpose 2 Scores**

Scale at A3
1:50,000

Job No 272956-00	Drawing Status Issue
----------------------------	--------------------------------

Drawing No 3.2	Issue P3
--------------------------	--------------------

3.3 Purpose 3 Assessment: To assist in safeguarding the countryside from encroachment

The sub-areas all score weakly against this purpose, as shown in Table 3.3 and Figure 3.3. This reflects the overall lower level of openness in the south-east of the borough and the mixed land uses, which contain urbanising influences.

Table 3.3: Purpose 3 Summary of Scores

Sub-area	Purpose 3 Score
SA-76	2
SA-77	0
SA-78	2

3.4 Purpose 4 Assessment: To preserve the setting and special character of historic towns

The three sub-areas do not abut either Radlett's historic core or the Conservation Areas in Bushey identified historic settlement core and therefore do not meet this Purpose. All three sub-areas thus scored 0 against Purpose 4, as shown in Table 3.4 and Figure 3.4.

Table 3.4: Purpose 4 Summary of Scores

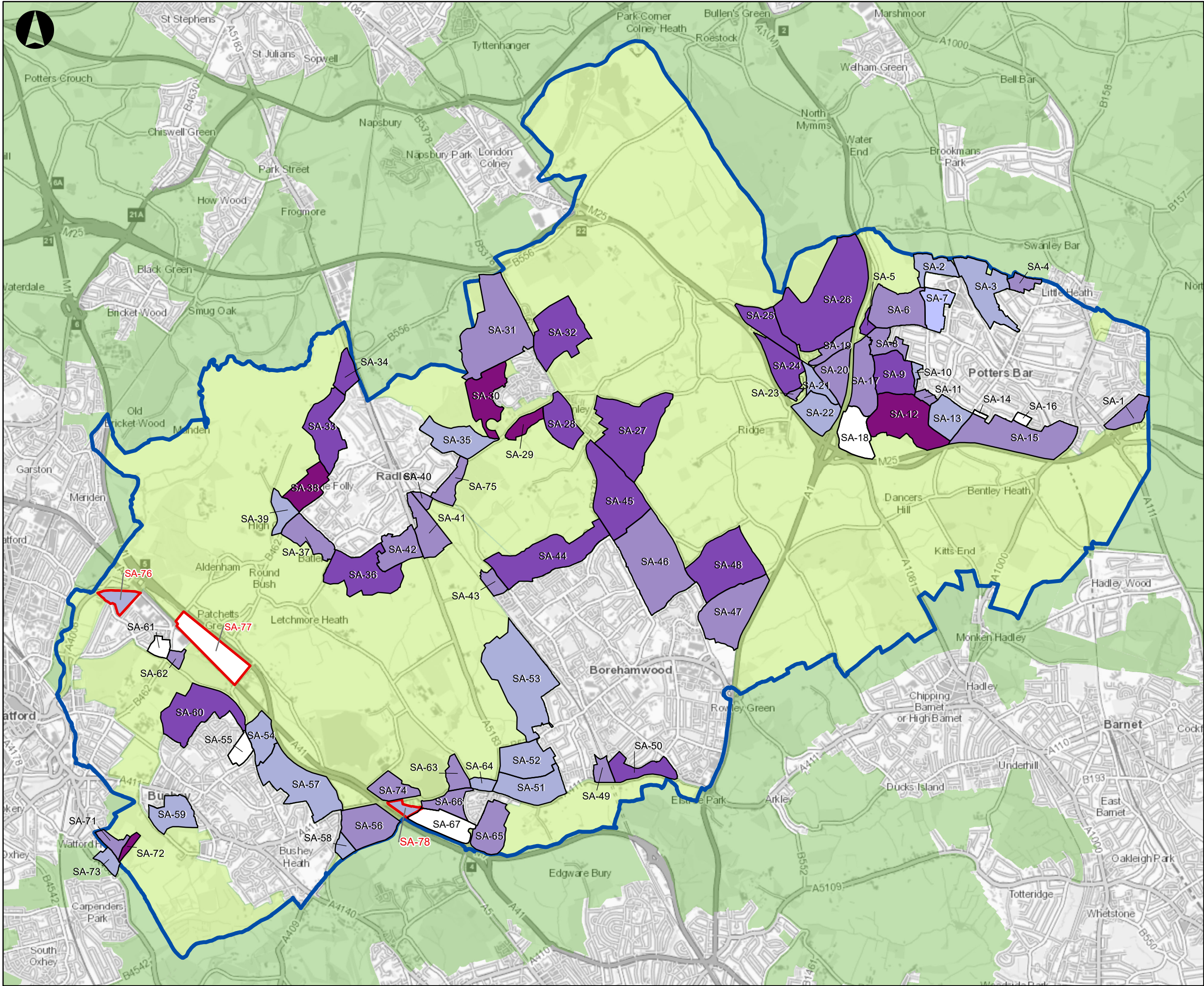
Sub-area	Purpose 4 Score
SA-76	0
SA-77	0
SA-78	0

3.5 Strategic Green Belt Assessment

Additional qualitative assessment was undertaken to identify the role of sub-areas as part of the wider strategic Green Belt parcels within which they are located (full details found in Appendix A). The assessment scores are shown in Table 3.5 and Figure 3.5.

Table 3.5: Strategic Green Belt Assessment Summary

Sub-area	Contribution to Wider Strategic Green Belt
SA-76	Less important
SA-77	Less important
SA-78	Less important



Legend

Additional Sub-Areas

Purpose 3 Score

0

1

2

3

4

5

Sub-Areas

Hertsmere Boundary

Hertsmere Green Belt

Neighbouring Green Belt

P2 11-10-18 IJ EW KF

Issue Date By Chkd Appd

Contains OS data © Crown Copyright and database right 2019

Metres
0 650 1,300 2,600

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Hertsmere Borough Council

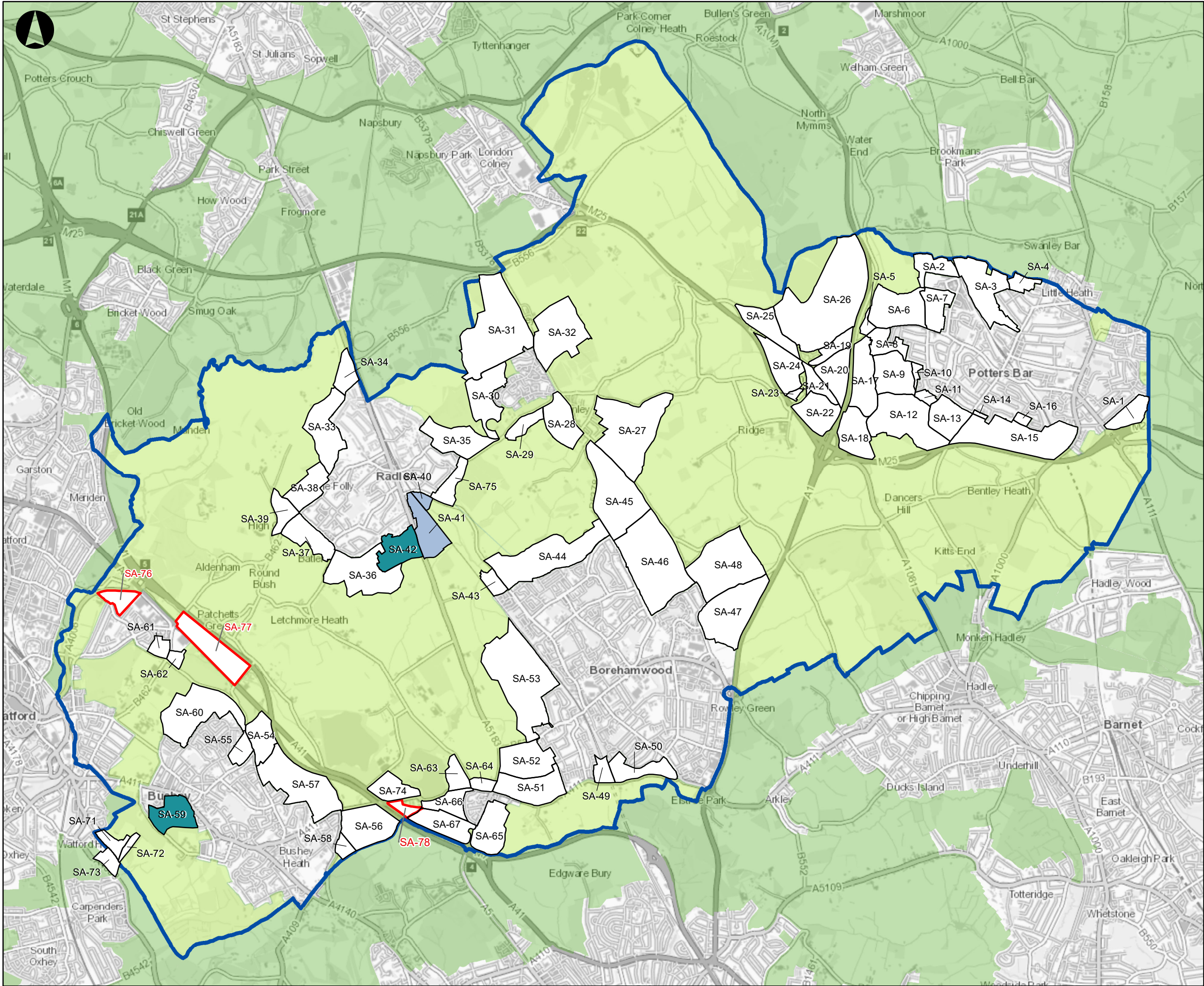
Job Title
**Hertsmere Green Belt Assessment Stage 2
- Additional Sites**

**Figure 3.3
Purpose 3 Scores**

Scale at A3
1:50,000

Job No **272956-00** Drawing Status **Issue**

Drawing No **3.3** Issue **P3**



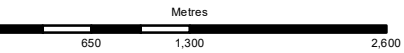
Legend

- Additional Sub-Areas
- Purpose 4 Score
 - 0
 - 1
 - 3
 - 5
- Sub-Areas
- Hertsmere Boundary
- Hertsmere Green Belt
- Neighbouring Green Belt

Contains OS data © Crown Copyright and database right 2019

P1	16-10-18	IJ	EW	KF
----	----------	----	----	----

Issue	Date	By	Chkd	Appd
-------	------	----	------	------



ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client
Hertsmere Borough Council

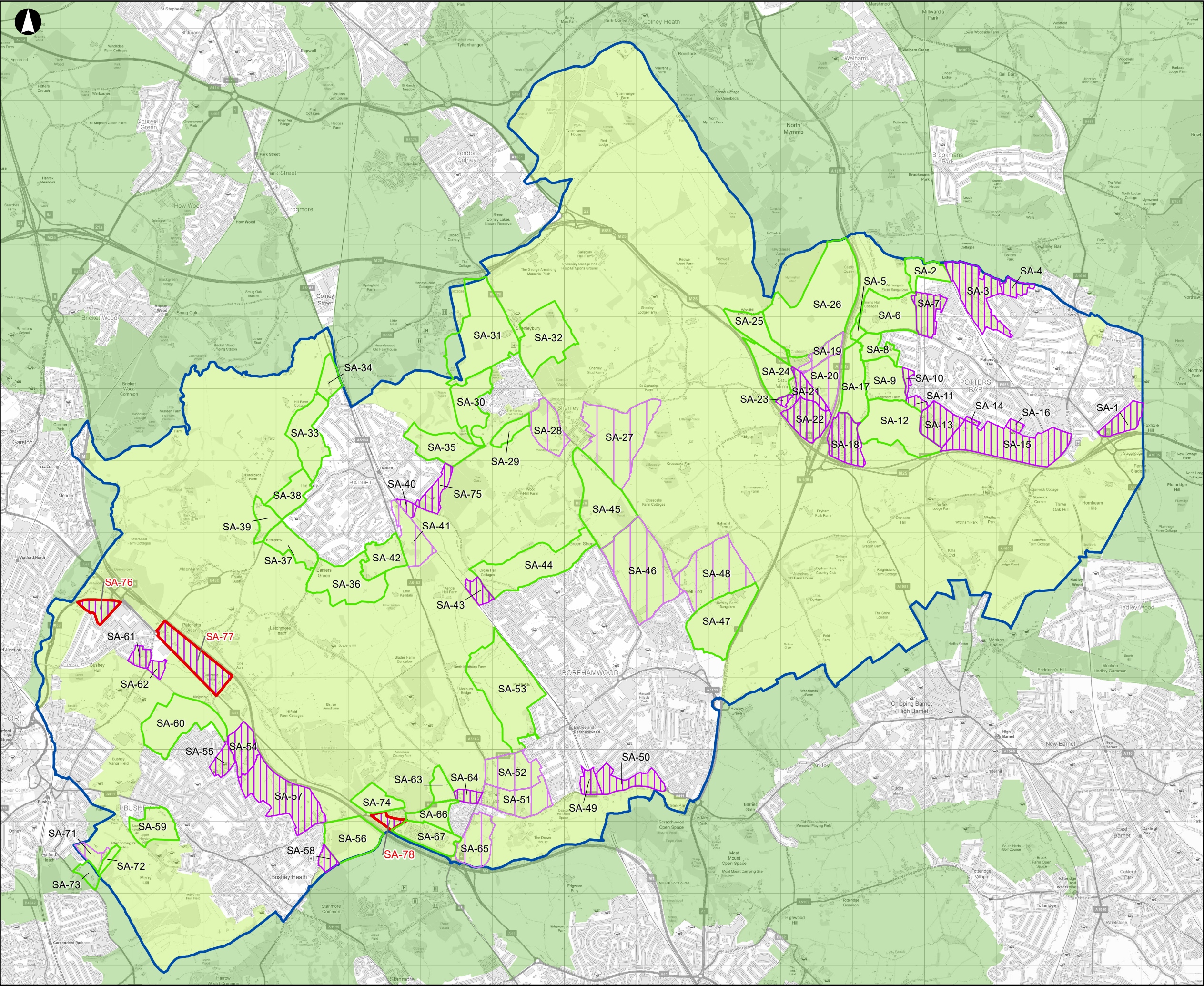
Job Title
**Hertsmere Green Belt Assessment Stage 2
- Additional Sites**

Figure 3.4
Purpose 4 Scores

Scale at A3
1:50,000

Job No 272956-00	Drawing Status Issue
----------------------------	--------------------------------

Drawing No 3.4	Issue P3
--------------------------	--------------------



Legend

- Additional Sub-Areas
- Important
- Less important
- Partly less important
- Hertsmere Borough Boundary
- Hertsmere Green Belt
- Neighbouring Green Belt

Contains OS Data
© Crown copyright and database rights 2016 OS EUL 100017428

P1	10-10-18	IJ	KF	KF
----	----------	----	----	----

Issue	Date	By	Chkd	Appd

Metres

0 650 1,300 2,600

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client

Hertsmere Borough Council

Job Title

**Hertsmere Green Belt Assessment
(Stage 2)**

**Figure 3.5:
Strategic Assessment Findings**

Scale at A3

1:50,000

Job No 272956-00	Drawing Status Issue
Drawing No 3.5	Issue P3

3.6 Boundary Consideration

The consideration of the strength of sub-area boundaries identified where removal of a sub-area from the Green Belt could result in boundaries that were stronger, weaker, or comparable to existing. Where boundaries weaknesses were identified, the assessment identified where mitigation might be required, for example through strengthening existing partial boundary features or creation of a new boundary feature. The boundary consideration for each sub-area can be found in the assessment pro-formas in the Annex Report.

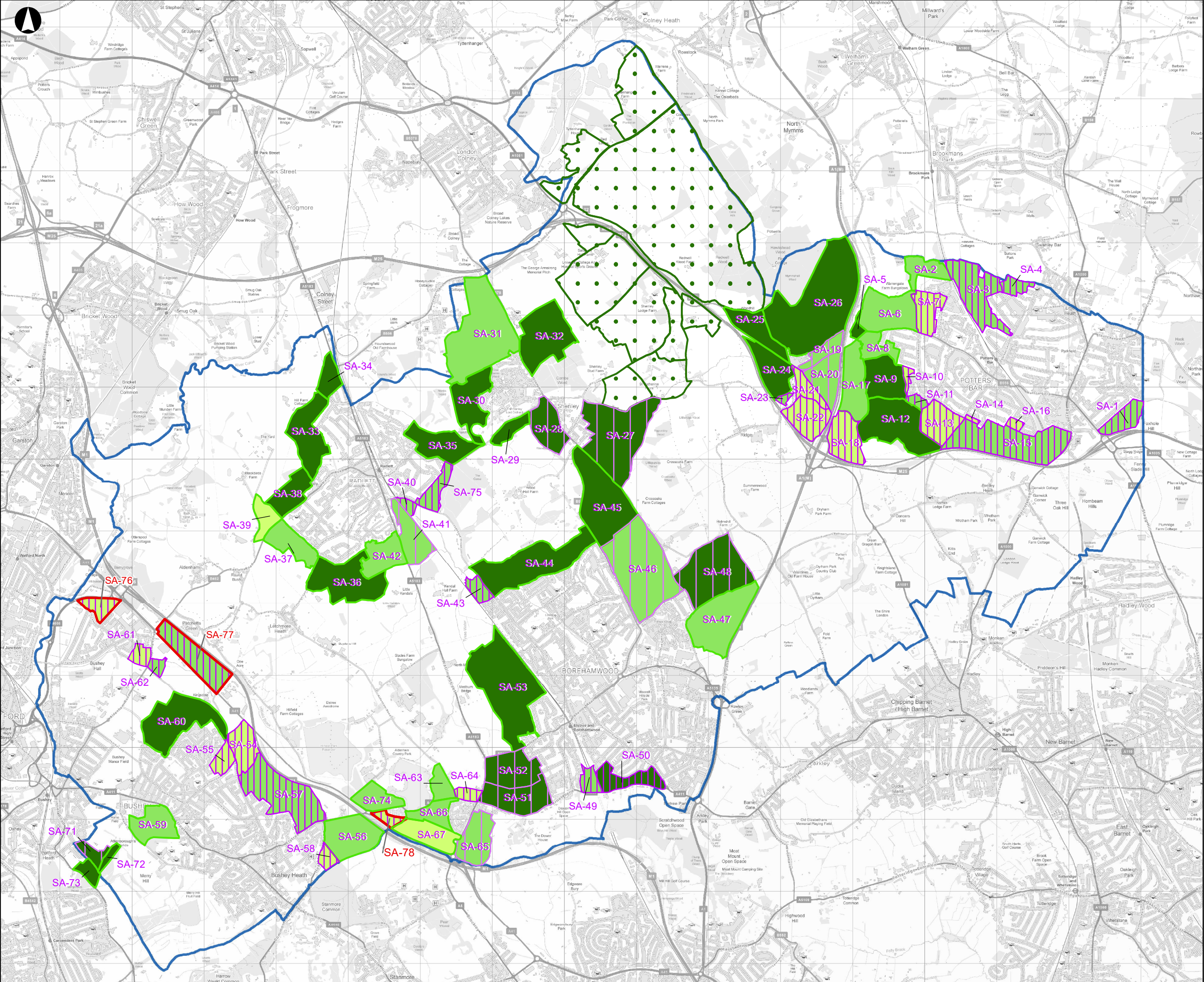
3.7 Categorisation

Each sub-area was categorised as to whether the sub-area (or combination of sub-areas, or part of sub-area) should be considered further. The categories are shown in Table 3.6 and Figure 3.6.

All three additional sub-areas are recommended for further consideration. The sub-areas meet purpose assessment criteria weakly to moderately and have been assessed to make a less important contribution to the wider strategic Green Belt.

Table 3.6: Summary of Categorisation

Sub-area	Meets Purpose Assessment Criteria	Contribution to Wider Strategic Green Belt	Categorisation
SA-76	Weakly	Less important	Recommended for further consideration
SA-77	Moderately	Less important	Recommended for further consideration
SA-78	Weakly	Less important	Recommended for further consideration



Legend

Meets Purpose Assessment

Weak

Moderate

Strong

Contribution to Wider Strategic Green Belt and Categorisation

Important - Not recommended for further consideration

Less important - Recommended for further consideration

Partly less important - Partly recommended for further consideration

Hertsmere Borough Boundary

Contains OS Data
© Crown copyright and database rights 2016 OS EUL 100017428

P1	10-10-18	IJ	KF	KF
----	----------	----	----	----

Issue	Date	By	Chkd	Appd
-------	------	----	------	------

Metres

06501,3002,600

ARUP

13 Fitzroy Street
London W1T 4BQ
Tel +44 20 7636 1531 Fax +44 20 7580 3924
www.arup.com

Client

Hertsmere Borough Council

Job Title

Hertsmere Green Belt Assessment
(Stage 2)

Figure 3.6:
Sub-Area Categorisation

Scale at A3

1:50,000

Job No	Drawing Status
272956-00	Issue
Drawing No	Issue
3.6	P3

MXD Location

© Arup

4 Recommendations

This section sets out a series of recommendations that the Council should consider in the review of the Hertsmere Local Plan. These draw on the assessment against the NPPF Purposes, the assessment of harm to the wider strategic Green Belt, and consideration of boundaries, together with the sub-area categorisation. Consideration of whether exceptional circumstances exist to justify any alterations to the Green Belt boundary are not made. It is anticipated that these recommendations will support the Council in developing its spatial strategy.

4.1 Sub-area recommendations

All sub-areas are recommended for further consideration in isolation (RA)⁴. It is considered that their removal from the Green Belt is unlikely to result in harm to the wider Green Belt.

⁴ See Section 6.1 of GBA Stage 2 report for further details on areas for further consideration. Available here: <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/Green-Belt-Assessment-2-DRAFT-Final-Report.pdf>

RA-15 (SA-76) – Land south of the A4008, Bushey



Step 4A (NPPF Assessment): SA-76 meets the purposes weakly. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area. It scores weakly for Purpose 2, forming a part of a wider gap between North Bushey and the large built-up area of Watford. The sub-area meets Purpose 3 weakly, due to its enclosed nature and limited connection to the wider countryside and its urbanising influences. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): SA-76 makes a less important contribution to the wider strategic Green Belt. The sub-area scores less strongly than the Green Belt Parcel 22 it lies within. SA-76 does not adjoin any other sub-areas and therefore its release would not create a cumulative strategic impact. While it contributes to the wider gap between Watford and North Bushey, this contribution is limited by its small scale, enclosed nature and semi urban character.

Step 4C (Consideration of Boundaries): Both inner and outer boundaries are readily recognisable and likely to be permanent, comprising motorways and A-roads and the regular backs of residential properties and gardens. If released, the sub-area would therefore result in a designation of a Green Belt boundary of similar strength to the existing boundary.

Step 5 (Categorisation): The sub-area meet purpose assessment criteria weakly and has been assessed to make a less important contribution to the wider strategic Green Belt. The sub-area is recommended for further consideration.

Step 6 (Recommendation): SA-76 performs weakly against NPPF purposes and plays a less important role in respect of the wider strategic Green Belt. It is noted that the release of the sub-area would result in the designation of a similarly performing Green Belt boundary, when compared with the existing boundary. It is recommended that sub-area 76 is considered further for release as RA-15.

RA-16 (SA-77) – Land south-west of the M1, Bushey



Step 4A (NPPF Assessment): SA-77 meets the purposes moderately. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area. It scores moderately for Purpose 2, forming a less essential part of wider gaps between North Bushey and Radlett, and North Bushey and Bushey Heath. The sub-area meets Purpose 3 weakly, containing a significant amount of built-form and low-grade open space. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): SA-77 makes a less important contribution to the wider strategic Green Belt. At the more granular level, SA-77 performs similarly to the Green Belt Parcel, however due to its smaller size and high proportion of built form and urbanising features, it plays a weaker role in protecting the openness of the wider countryside. SA-77 does contribute to the wider gaps between North Bushey and Radlett/Bushey Heath and plays a role in preventing ribbon development along the A41, however this contribution is limited by its small scale, enclosed nature and urban character.

Step 4C (Consideration of Boundaries): Both inner and outer boundaries are readily recognisable and likely to be permanent, comprising motorways and A-

roads. If released, the sub-area would therefore result in a designation of a Green Belt boundary of similar strength to the existing boundary.

Step 5 (Categorisation): The sub-area meets purpose assessment criteria moderately and has been assessed to make a less important contribution to the wider strategic Green Belt. The sub-area is recommended for further consideration.

Step 6 (Recommendation): SA-77 performs moderately against NPPF purposes and plays a limited role in respect of the wider strategic Green Belt. It is noted that the release of the sub-area would result in the designation of a similarly performing Green Belt boundary, when compared with the existing boundary. It is recommended that sub-area 77 is considered further for release as RA-16.

RA-17 (SA-78) – Land north-east of the A41, Bushey



Step 4A (NPPF Assessment): SA-78 meets the purpose weakly. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area. It scores weakly for Purpose 2, forming a less essential gap between Elstree and Bushey Heath/Bushey Village. The sub-area meets Purpose 3 weakly, containing mixed land-uses and urbanising influences. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): SA-78 makes a less important contribution to the wider strategic Green Belt. At the more granular level, SA-78 performs similarly to the Green Belt Parcel it lies in as it does not score against Purpose 1 and 4 and performs weakly against Purpose 3. However, due to its significantly smaller scale, proximity to the M1 and semi-urban character, the sub-area performs a weaker role against purpose 2. SA-78 plays a less important role in the wider strategic green belt due to its small scale and semi-urban character. The cumulative loss of adjacent sub-area could significantly reduce the gap between settlements Elstree and Bushey Heath/Bushey Village.

Step 4C (Consideration of Boundaries): The inner boundaries vary in strength. The south, west and north-west boundaries are readily recognisable and likely to be permanent, comprising motorways and A-roads and an industrial estate. The

south-east is formed of a mature tree line which is less durable. As SA-78 is surrounded by Green Belt on all sides, there are no outer boundaries to be considered. If released, the sub-area would therefore result in a designation of a Green Belt boundary of similar strength to the existing, although the south-east boundary may require strengthening.

Step 5 (Categorisation): The sub-areas meet purpose assessment criteria weakly and has been assessed to make a less important contribution to the wider strategic Green Belt. The sub-area is recommended for further consideration.

Step 6 (Recommendation): SA-78 performs weakly against NPPF purposes and plays a limited role in respect of the wider strategic Green Belt. It is noted that the release of the sub-area would result in the designation of a similarly performing Green Belt boundary, when compared with the existing boundary. It is recommended that sub-area 78 is considered further for release as RA-17.

5 Conclusions

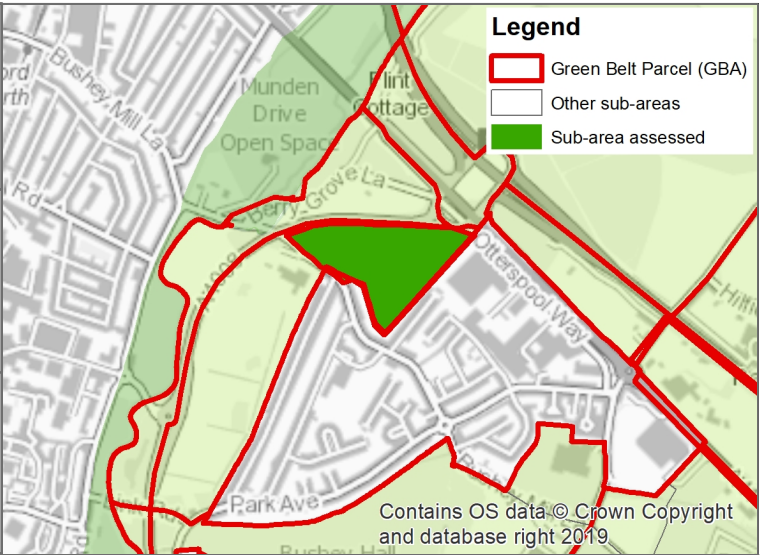

This Study complements the Stage 2 Green Belt Assessment (GBA). It provides an assessment of three additional sites that were identified in consultation after the completion of the GBA Stage 2 study.

The three additional sites were assessed against the NPPF purposes. The three sites are located to the south-east of the borough and exhibit varying characteristics. All sub-area contains built-form or are subject to urbanising influences. While SA-76 and SA-78 have a semi-urban character, SA-77 has an urban feel due to its significant amount of built-form. SA-76 and SA-78 both play a lesser role in preventing neighbouring towns from merging, while SA-77 plays a moderate role. The presence of strong and durable features also acts to maintain the gap between neighbouring settlements. None of the sub-areas perform against Purpose 4. As such, all three additional sub-areas are recommended for further consideration in isolation. It is considered that if removed from the Green Belt, these areas are unlikely to harm the performance of the wider Green Belt.

The recommendations set out in this Study will not automatically lead to the release of land from in Green Belt. This Study will accompany GBA Stage 2 and form part of a suite of evidence, which will be used to inform the plan-making process. The Council will need to carefully consider whether, in accordance with the NPPF, there are any exceptional circumstances that justify the alteration of Hertsmere Green Belt boundary through the Local Plan review.

Appendix A

Site Pro formas

Sub-area	SA-76	
Area (ha)	10	
Green Belt Parcel (GBA)	22	
		
Description	The sub-area is located to the south-east of North Watford. It is bounded by the A4008 to the north and west, Bushey Mill Lane to the south and Highwood Avenue and the back of a retail outlet in the east.	

Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas	The sub-area is not at the edge of a distinct large built up area, in physical or perceptual terms.	Fail
	(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	n/a	0

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	The sub-area forms a less essential part of a wider gap between North Bushey and the large built-up area of Watford which is of sufficient scale that its removal would not result in physical coalescence. The sub-area plays a role in maintaining the openness of the gap due to the visual links to Watford, however the presence of non-natural features reduces the extent to which the sub-area prevents perceptual coalescence.	1
--	---	---	---

Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>The sub-area contains approximately 2% built form, comprising a pylon and overhead cables running through the centre of the site. The sub-area comprises an open field with a slight incline to the south-east. The sub-area is relatively enclosed with limited views to open countryside, however there are some longer views to the built-up area of North Watford in the north-west. Whilst there is limited built form within the sub-area, there are a number of urbanising influences including the A4008 to the north, backs of residential properties and gardens along Bushey Mill Lane to the south and an industrial park to the east.</p> <p>Overall, the sub-area has a largely semi-urban character.</p>	2
--	--	--	---

Purpose 4 Assessment

(4) To preserve the setting and specific character of historic towns	Protects land which provides immediate and wider context for a historic town	The sub-area does not abut an identified historic settlement core and does not meet this Purpose.	0
--	--	---	---

Step 4B: Assessment of Impacts on the Wider Green Belt

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	22	0	5	3	0
Assessment of wider impact	<p>The sub-area lies within Green Belt Parcel (GBA) 22, which scored strongly overall. It was identified that Parcel 22 failed against Purpose 1, performed strongly against Purpose 2 and moderately against Purpose 3. Parcel 22 did not perform against Purpose 4. The Parcel was identified as playing an important role in maintaining the very narrow gap between Watford and North Bushey.</p> <p>At the more granular level, the sub-area performs similarly to the Green Belt Parcel in relation to Purpose 1 and 4. However, due to its enclosed nature, smaller scale and urbanising influences it plays a lesser role against Purpose 2 and 3. It forms a less essential part of the gap between Watford and North Bushey and has a largely semi-urban character.</p> <p>SA-76 does not adjoin any other sub-areas and therefore its release would not create a cumulative strategic impact.</p> <p>Overall the sub-area plays a less important role in the wider strategic green belt. It contributes to the essential gap between Watford and North Bushey, however, this contribution is limited by its small scale, enclosed nature and semi-urban character.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The inner boundaries of the sub-area are readily recognisable and likely to be permanent comprising:</p> <ul style="list-style-type: none"> -Regular backs of residential properties and gardens along Highwood Avenue and the industrial park in the south-east; and -Regular backs of residential properties and gardens along Bushey Mill Lane to the south-west. <p>The outer boundaries of the sub-area are also readily recognisable and likely to be permanent comprising:</p> <ul style="list-style-type: none"> - Stephenson Way (A4008) in the north; and - Bushey Mill Lane in the north west. <p>If released, the sub-area would therefore result in the designation of a Green Belt boundary comparable to the existing inner Green Belt Boundary.</p>
--	--

Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.
-------------------	--

Site Photos



Photograph 1 View of SA-76 facing south-west from the center of the sub-area with views of the open field and surrounding residential development along the eastern and western border.



Photograph 2 View of SA-76 facing north-west from the south of the sub-area with views of Bushey Mill Lane and the A4008.

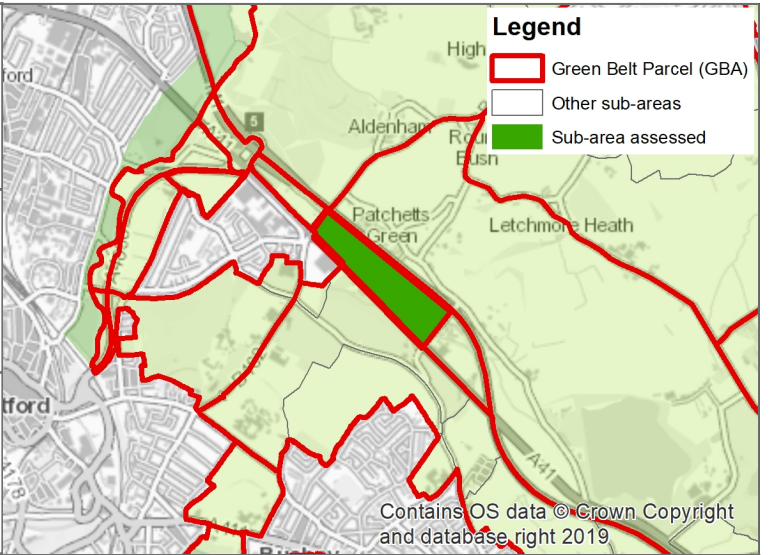
Site Photos

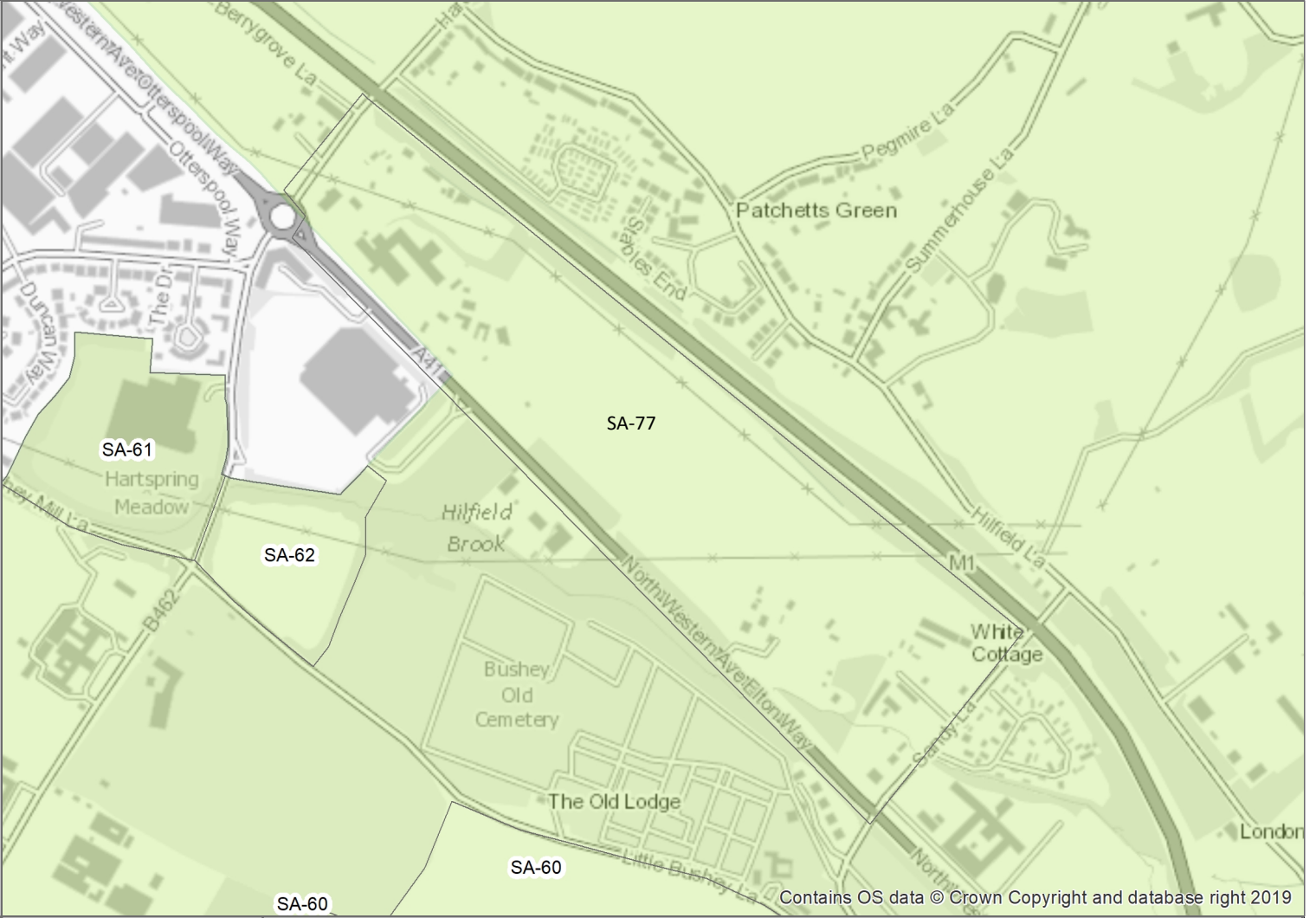


Photograph 3 View of SA-76 facing east from the center of the sub-area with views of the Industrial Park and residential properties along Highwood Avenue.



Photograph 4 View of SA-76 facing north from the west of the sub-area with views of the Pylon and dense tree line along the northern boundary which runs adjacent to the A4008.

Sub-area	SA-77	
Area (ha)	34	
Green Belt Parcel (GBA)	14	



Description	<p>The sub-area is located to the east of North Watford and the north-west of Bushey. It is bounded by the M1 to the north-east, Sandy Lane to the south-east, the A41 to the south-west and the B462 to the north-west.</p>
-------------	--

Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas	The sub-area is not at the edge of a distinct large built up area, in physical or perceptual terms.	Fail
	(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	n/a	0

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	The sub-area forms a less essential part of a wider gap between both North Bushey and Radlett and North Bushey and Bushey Heath. The sub-area is enclosed with limited views to the surround countryside and settlements, however it plays an important role in preventing ribbon development along the A41, which would reduce the scale of the gap (both physically and perceptually) and create an irregular pattern of development.	3
--	---	---	---

Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>Approximately 34% of the sub-area is covered by built form. The character of the area varies throughout the site. There is substantial built form in the east and west, comprising hotels, restaurants and light industrial uses. In the centre of the sub-area there is a series of paddock fields, low grade open space and some agricultural uses. Throughout the sub-area there is an undulating topography, however long views to the wider countryside are prevented by built form or dense mature trees.</p> <p>Overall, the sub-area has an urban character.</p>	0
--	--	---	---

Purpose 4 Assessment

(4) To preserve the setting and specific character of historic towns	Protects land which provides immediate and wider context for a historic town	The sub-area does not abut an identified historic settlement core and does not meet this Purpose.	0
--	--	---	---

Step 4B: Assessment of Impacts on the Wider Green Belt

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	14	0	3	2	0
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (14), which was identified as failing against Purpose 1, and performing moderately against Purpose 2 and weakly against purpose 3. The Parcel does not meet Purpose 4. The Parcel is recognised as playing an important role in preventing ribbon development along the A41, which would reduce the scale of the gap between North Bushey and Bushey Heath/Bushey Village (both physically and perceptually).</p> <p>At the more granular level, the sub-area performs similarly to the Green Belt Parcel, however due to its smaller size and high percentage of built form and urbanising features, it plays a weaker role in protecting the openness of the wider countryside (Purpose 3).</p> <p>SA-77 does not not adjoin any other sub-areas and therefore its release would not create a cumulative strategic impact.</p> <p>Overall the sub-area plays a less important role in the wider strategic green belt. The sub-area does contribute to the wider gap between North Bushey and Radlett/Bushey and plays a role in preventing ribbon development along the A41 , however this contribution is limited by its small scale, enclosed nature and urban character.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The inner boundaries of the sub-area are predominantly formed of readily recognisable and likely to be permanent boundaries. They comprise:</p> <ul style="list-style-type: none"> - M1 to the north-east; - Sandy Lane to the south-east; - A42 to the south-west; and - Hartspring Lane to the north-west. <p>The outer boundary is readily recognisable and likely to be permanent, comprising:</p> <ul style="list-style-type: none"> - A small part of the A41 in the western extent of the south western border. <p>If released, the sub-area would therefore result in the designation of a Green Belt boundary of similar strength to the existing boundary.</p>
--	--

Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria moderately, and makes an less important contribution to the wider strategic Green Belt. Recommended for further consideration.
-------------------	--

Site Photos



Photograph 1 View of SA-77 facing east from the north western boundary of the sub-area showing the significant built form in the northern part of the sub-area.



Photograph 2 View of SA-77 facing south from the footpath in the center of the sub-area showing low grade paddock fields, enclosed boundaries in the east and west and built form to the south.

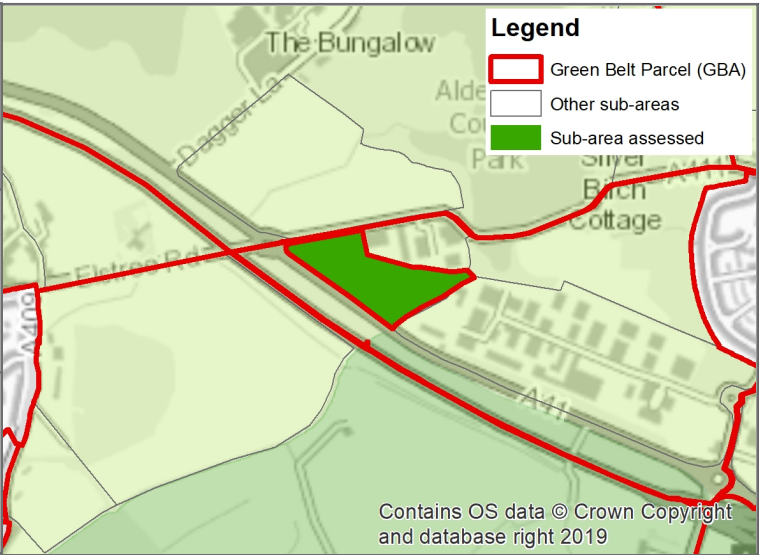
Site Photos

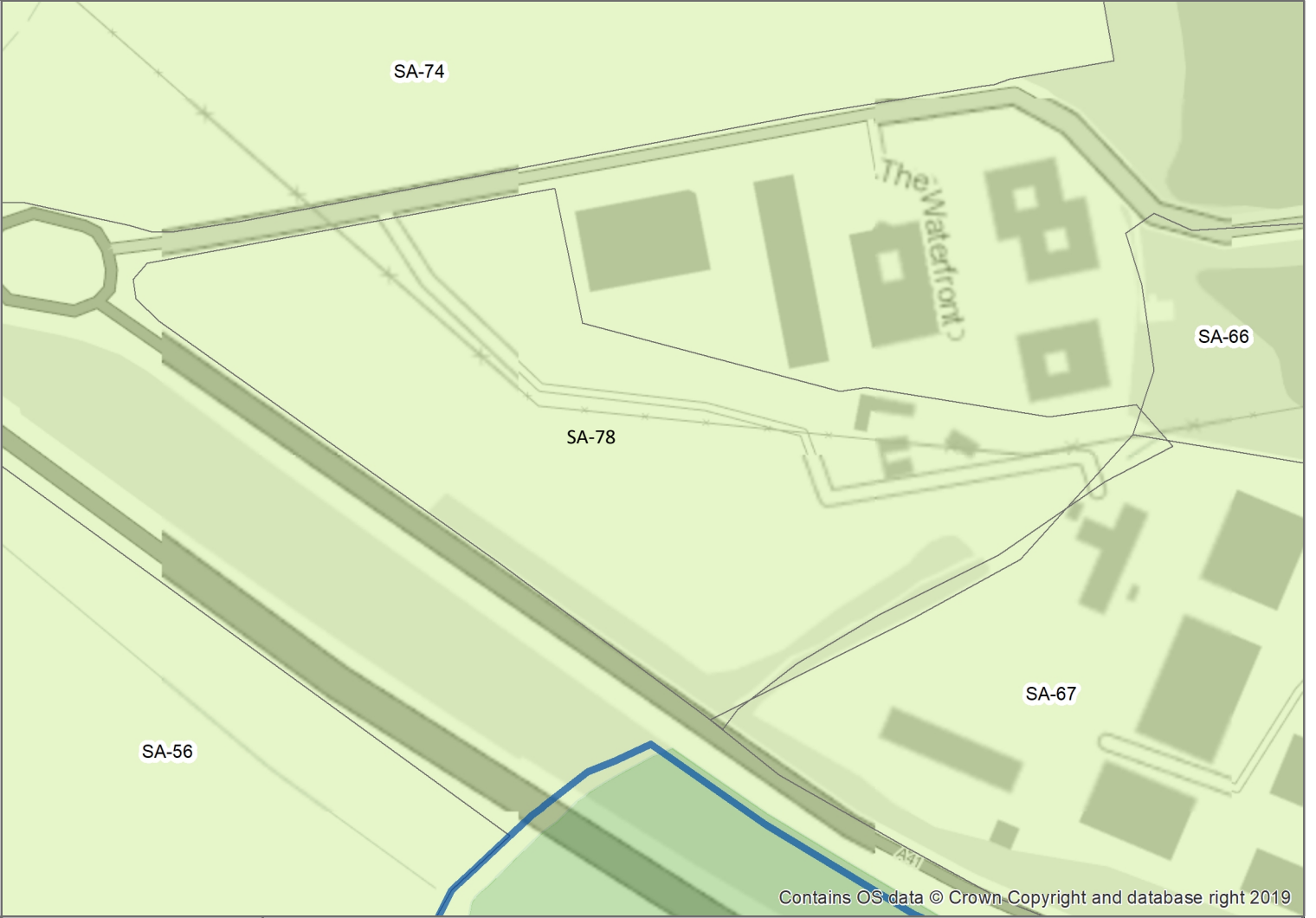


Photograph 3 View of SA-77 facing north east from the footpath in the centre of the sub-area showing shrubland and residential properties adjacent to the M1 in the north east.



Photograph 4 View of SA-77 facing east from the south western boundary of the sub-area showing an access point and built form within the southern part of the sub-area.

Sub-area	SA-78	 <p>Legend</p> <ul style="list-style-type: none"> Green Belt Parcel (GBA) Other sub-areas Sub-area assessed <p>Contains OS data © Crown Copyright and database right 2019</p>
Area (ha)	5	
Green Belt Parcel (GBA)	5	



Description	<p>The sub-area is located to the south-west of Borehamwood. It is bounded by Elstree Road and the back of an industrial state to north, a tree line and back of industrial estate to the east, the A41 to the south and the Elstree Road Roundabout to the west.</p>
-------------	---

Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas	The sub-area is not at the edge of a distinct large built up area, in physical or perceptual terms.	Fail
	(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	n/a	0

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	The sub-area forms a less essential part of the wider gap between Elstree and Bushey Heath/Bushey Village, which is of sufficient scale and character that the settlements are unlikely to merge. While the gap between these settlements is narrow in physical terms, the scale of the sub-area and the M1 to the south west of the sub-area provides an additional boundary to prevent the actual coalescence of settlements.	1
--	---	---	---

Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>Approximately 10% of the sub-area is covered by built form. The sub-area has a varied character. The north east comprises sporadic built form for light industrial uses and the Canine Paradise kennels. The south to south west of the sub-area comprises low grade paddock fields with a stream in the south. There are restricted views to the wider green belt due to the topography and surrounding mature tree lines. However, there are short views to the surrounding built form and urbanising influences.</p> <p>Overall the sub-area has a semi-urban character.</p>	2
--	--	--	---

Purpose 4 Assessment

(4) To preserve the setting and specific character of historic towns	Protects land which provides immediate and wider context for a historic town	The sub-area does not abut an identified historic settlement core and does not meet this Purpose.	0
--	--	---	---

Step 4B: Assessment of Impacts on the Wider Green Belt

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	5	0	5	2	0
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (5) which was identified as failing against Purpose 1, performing strongly against Purpose 2 and performing weakly against Purpose 3. The Green Belt Parcel did not score against Purpose 4. The Parcel was identified as performing strongly as it maintained the gap between Elstree and Bushey Heath/Bushey Village which is of a small scale. However, within this assessment, the south of the parcel around Centennial Business Park was identified as having an urban character and making a limited contribution to Purpose 2.</p> <p>At the more granular level the sub-area performs similarly to the Green Belt Parcel 5 as it does not score against Purpose 1 and 4, and performs weakly against Purpose 3. However, due to its significantly smaller scale, proximity to the M1 and its semi-urban character, the sub-area performs a weaker role against purpose 2.</p> <p>SA-78 adjoins sub-areas SA-74, SA-66 and SA-67 to the south of the M1. SA-78 is directly adjacent to SA-74 to the north, SA-66 to the east and SA-67 to the southeast. As a result of the dense urban nature of SA-74 and SA-67 it is considered that, if SA-78 were to be removed from the Green Belt there would be no impact upon the performance of SA-74 and SA-67 against Green Belt Purposes. Similarly, the likelihood of any impact upon SA-66 is low due to the presence of existing surrounding built form and limited views between sub-areas. However, the release of SA-78 in isolation would result in the fragmentation of a narrow gap that is already perceptually reduced in scale by the presence of ribbon development along the A411 (Watford Road).</p> <p>If SA-78, SA-74, SA-66 and SA-67 were released in combination, this would cumulatively reduce the physical and perceptual gap between Elstree and Bushey Heath/Bushey Village, however the M1 provides additional barrier to coalescence.</p> <p>Overall, SA-78 plays a less important role in the wider strategic green belt due to its small scale and semi-urban character. However, its release would result in an irregular development pattern. Cumulatively it could significantly reduce the gap between settlements Elstree and Bushey Heath/Bushey Village.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The inner boundaries of the sub-area are varied in strength. To the south, west and north west the boundaries are readily recognisable and likely to be permanent comprising the A411 in the north, A41 in the south, Elstree roundabout in the west and the back of Waterfront Business Park in the north east. However, the boundary in the south east formed of a mature tree line as well as the far eastern extent which lacks any physical boundary would require strengthening.</p> <p>As SA-78 is surrounded by Green Belt land on all sides, there are no outer boundaries to be considered.</p> <p>Therefore, if SA-78 were released, it would result in a Green Belt boundary of comparable strength to the existing.</p>
--	---

Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria weakly and makes an less important contribution to the wider strategic green belt. Recommended for further consideration.
-------------------	---

Site Photos



Photograph 1 View of SA-78 facing north east from the center of the sub-area showing an open paddock field, the northern boundary (A411) and the north eastern boundary with views to industrial built form.



Photograph 2 View of SA-78 facing north west from the south east of the sub-area showing the track road that runs through the sub-area, the low grade paddock fields, pylons and hardstanding.

Site Photos



Photograph 3

View of SA-78 facing south west from the south east of the sub-area showing low grade paddock fields, the tree line along the north eastern boundary, a stream and long views to adjacent industrial uses.



Photograph 4

View of SA-78 facing south from center of sub-area showing horse training ground and adjacent built form in the south.