

Hertsmere Borough Council

**Hertsmere Green Belt Assessment
Stage 2**

Final Report - Rev C

261001-00

Issue | 5 March 2019

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 261001-00

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1 Introduction

Arup has been appointed by Hertsmere Borough Council (HBC) to undertake a Stage 2 Green Belt Assessment (GBA Stage 2). This study advances the Stage 1 Green Belt Assessment (GBA) undertaken by Arup and published in January 2017 and will form part of the evidence base to support the review of the Hertsmere Local Plan 2012-2027.

The intention of this more refined and focussed assessment is to complement the conclusions formed in the GBA, and to ensure that HBC has made every effort to identify appropriate land to meet identified needs. The focus of the Stage 2 work has been to assess the parts of the Green Belt, which might contribute to ‘five potential development approaches’ identified in the Local Plan Issues and Options public consultation document (September 2017)¹, if exceptional circumstances can be demonstrated. These identified approaches were:

- Redevelopment of urban brownfield sites²;
- Growth through new garden suburbs;
- Supporting larger rural communities and growth of key villages;
- Meeting the needs of other villages; and
- Creating a new garden village.

Site Selection Considerations

The assessment will not be a policy or decision-making document that proposes any release of Green Belt land but it will be an important part of HBC’s evidence base. It is not within the remit of the GBA Stage 2 to consider exceptional circumstances arguments, which would be necessary to justify the release of land from the Green Belt. It will fall to the Council to further assess the sustainability and delivery of areas of land assessed through the GBA Stage 2 assessment, as appropriate, as part of the wider plan-making process.

Green Belt will not be the only consideration when assessing the suitability and deliverability of sites identified for allocation in Hertsmere. HBC will not be precluded from allocating Green Belt sites for development if other factors in favour of the site outweigh this consideration. Examples of other factors include:

- Unique / significant housing or employment need and a lack of supply of more preferential sites (i.e. those that the NPPF directs towards before considering Green Belt);
- Adverse implications for the sustainable development strategy within the borough;

¹ Issues and Options: September 2017 – Public Consultation;
<https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/Issues-and-Options-Report-final.pdf>

² This will not be relevant to the Stage 2 work given release of Green Belt will not be required.

- Inherent sustainability of directing growth in a particular direction;
- Tightly drawn Green Belt boundaries and constraints on alternative sites;
- The opportunity to deliver social infrastructure, which would bring about long-term benefits for local residents; or
- Boosting housing delivery in areas with past issues of deliverability in order to increase the supply of affordable housing.

1.1 Report Structure

The report is structured as follows:

- Section 2 considers the context for the assessment based on a review of policy, guidance and experience elsewhere, (the review itself can be found in Appendix A).
- Section 3 sets out the assessment methodology.
- Sections 4 and 5 presents the key findings of the assessment.
- Section 6 sets out recommendations.
- Section 7 provides the conclusions of the assessment.

The accompanying Annex Report presents the assessment pro-formas for each of the assessed sub-areas.

2 Context

The purpose of a Green Belt Assessment is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the NPPF. Local planning authorities may then take the findings of the review into account alongside other evidence in making decisions about their Local Plan Strategy, site allocations and ultimately possible alterations to Green Belt boundaries.

The GBA set out the relevant national and local policy framework for undertaking such an assessment, as well as relevant guidance and good practice identified elsewhere. As far as this is still relevant given the publication of the revised NPPF, it has continued to shape the methodology for the GBA Stage 2. This section therefore identifies additional findings from a review of policy, guidance and experience elsewhere since the GBA was undertaken (Appendix A), in particular the implications for undertaking this assessment:

- There is no Government defined methodology for carrying out a Stage 2 assessment and local authorities have therefore taken a variety of approaches to-date.
- Openness and permanence are key considerations in terms of Green Belt; and are therefore integral to the assessment of Green Belt across all Purposes³.
- Openness should be considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’ (for example, visual linkages between settlements in relation to Purpose 2, or functional character and linkages to the wider Green Belt in relation to Purpose 3)⁴.
- Green Belt should be assessed against the Purposes set out in NPPF and, if any purpose is to be excluded, there must be a robust rationale. Any methodology must clearly set out how the Purposes have been interpreted and should respect the local context, for example in relation to the definition of key terms.⁵
- A thorough approach must be taken to the identification of sub-areas for assessments, particularly where there is a risk that objectively assessed housing need would not be met without amending Green Belt boundaries.⁶
- Detailed Green Belt assessment does not need to be carried out for land covered by major policy constraints, for example flood zone 3b or sites of

³ See: National Planning Policy Framework (2018) paragraph 133; and Mel Middleton, Inspector (December 2017) *Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan*.

⁴ See: Turner v Secretary of State CLG and East Dorset Council (2016) *EWHC 2728 (Admin)*.

⁵ See: David Smith, Inspector, (24 January 2018), *Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030*

⁶ See: Mel Middleton, Inspector (December 2017) *Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan*.

international or national nature conservation importance, which would preclude development in any case⁷.

- When assessing whether an area can be removed from the Green Belt, consideration should be given to the presence or otherwise of readily recognisable and likely to be permanent boundary features⁸.
- Evidence from Green Belt assessments should be reviewed in conjunction with broader evidence of the suitability and deliverability to justify exceptional circumstances for amendments to the boundaries. Proposed amendments to the Green Belt should be intrinsically linked to a district's overall spatial strategy and there has to be a degree of certainty over the deliverability of sites to justify the exceptional circumstances required to remove them from the Green Belt⁹

⁷ Ibid.

⁸ See: National Planning Policy Framework (2018) paragraph 139

⁹ See: National Planning Policy Framework (2018) paragraph 136-138; and examination notes / reports, including Jonathan Bore, Inspector (23 March 2018) *Examination of the Guildford Borough Local Plan: Strategy and Sites, Inspector's Questions and Comments (No.1)*; Malcolm Rivett, Inspector (25 May 2016) *Vale of White Horse Local Plan 20131: Part 1 Examination – Inspector's Interim Findings*; and Roger Clews (11 March 2016) *Report on the Examination of the Birmingham Development Plan*

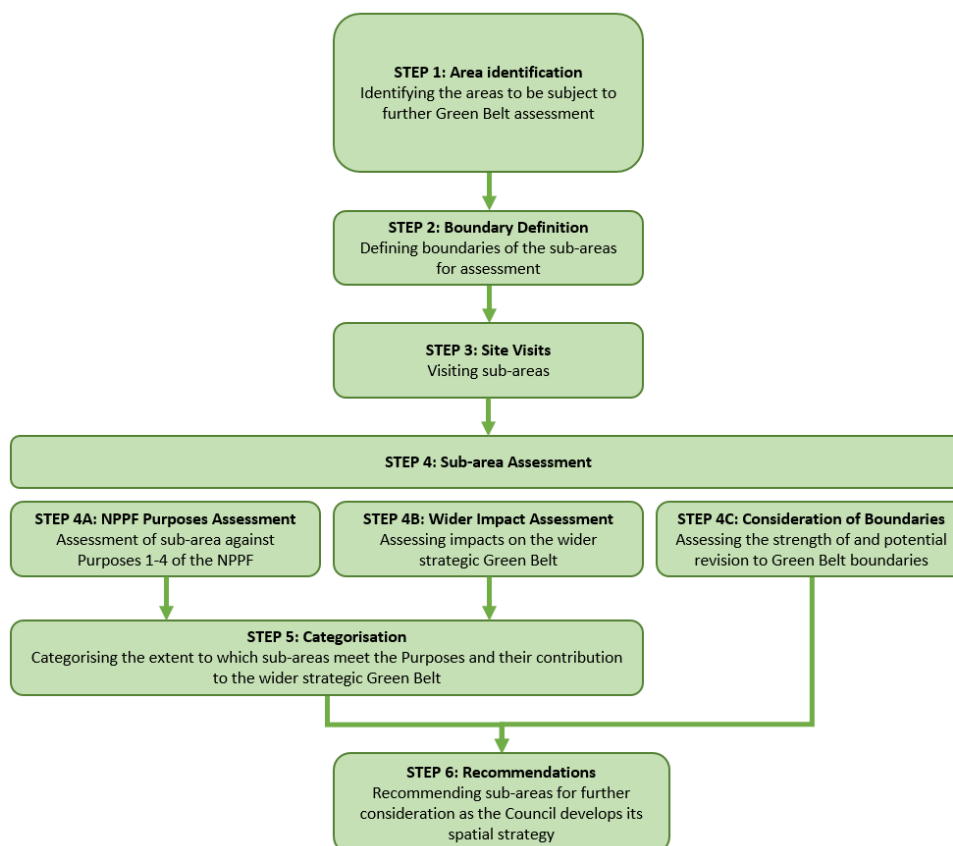
3 Methodology

3.1 Overview

This section sets out the methodology for undertaking the GBA Stage 2. An overview of the methodology process is summarised in Figure 3.1. The methodology has been developed to support and progress further the conclusions of the 2017 GBA. The more focussed nature of this assessment will help to ensure that smaller areas of Green Belt, which adjoin the existing urban settlements have been identified and assessed against the NPPF Purposes. The methodology has been developed to ensure consistency with the approach used in the GBA.

As part of the development of the methodology, the Council consulted with its duty to cooperate partners. A number of comments were received both supporting the general approach and suggesting potential changes or clarifications. These were taken into account in developing the method, where appropriate.

Figure 3.1 Methodology Diagram



3.2 Step 1: Area Identification

As part of the GBA, the entirety of the Green Belt in Hertsmere was assessed against the NPPF purposes. This first assessment stage identified fourteen areas for potential sub-division (Figure 3.2), which formed the starting point for defining sub-areas in this assessment. Parcels that were assessed as performing

weakly in their entirety in the GBA were not considered further, as they have already been identified as recommended areas for further consideration by HBC¹⁰.

The Council's Issues and Options Public Consultation Report (September 2017) formed the starting point for identifying the broad areas within the Green Belt to be assessed. The Report identified five potential development approaches for the Borough. The first of these, 'redevelopment of urban brownfield sites', would not necessitate amendments to Green Belt boundaries. Four further approaches were then presented:

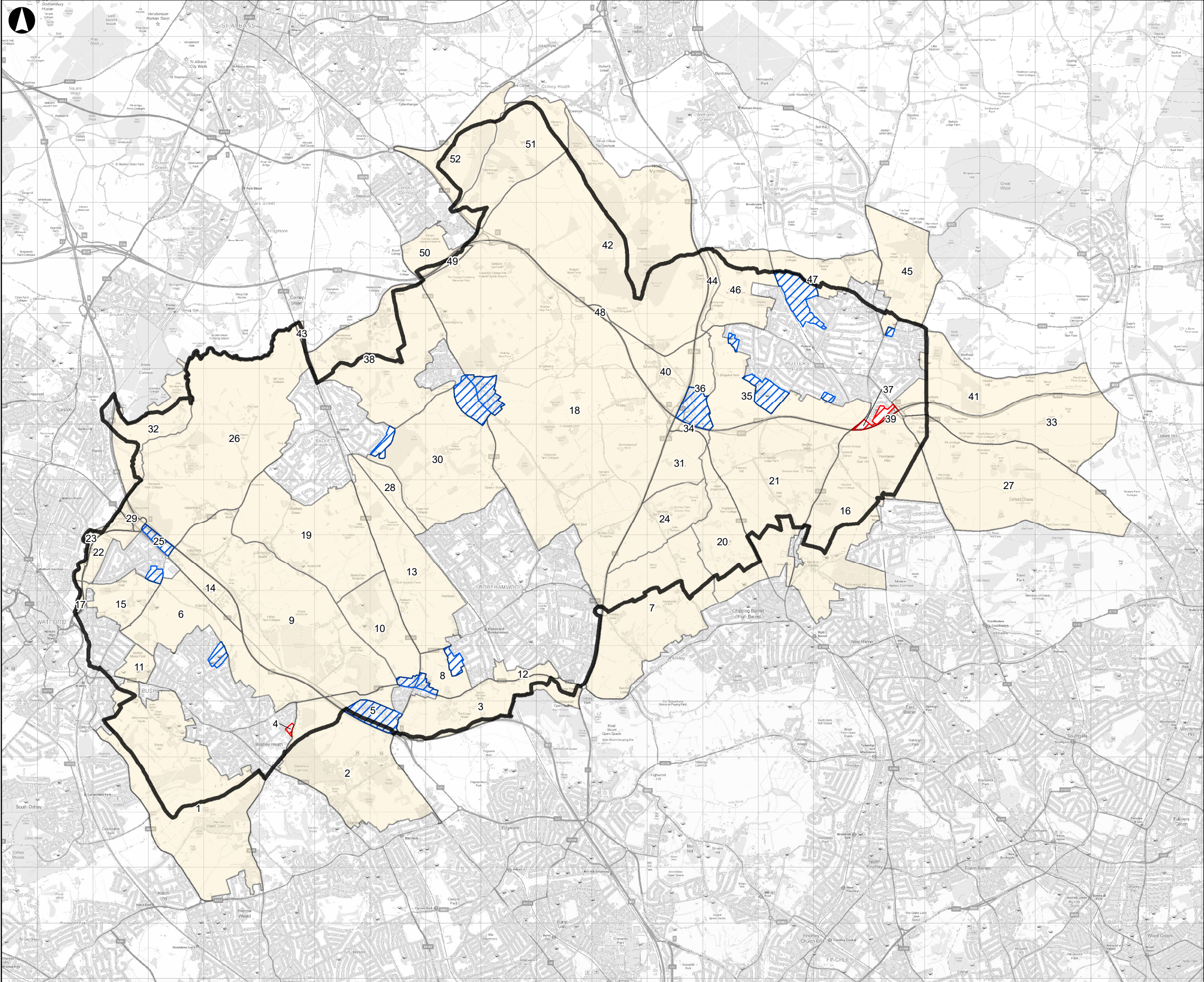
- Growth through new garden suburbs at the edges of existing towns, (Borehamwood, Potters Bar, Bushey and Radlett), which integrate with surrounding communities and accommodate up to 300-500 homes;
- Supporting larger rural communities through growth of key villages, delivering up to 1,000 homes with additional local shops and services, and potential expansion of local business parks;
- Meeting the needs of other villages by expanding selected smaller villages, delivering around 300 new homes and additional local services, including business growth. Smaller hamlets are not expected to be suitable for any significant growth; and
- Creating a new garden village of initially 4,000 new homes (200 hectares), most likely on land within an area of search north of Junction 22 and 23 of the M25.

The Report acknowledged that the preferred approach may ultimately combine several of these approaches. For some of these approaches, broad 'areas of search' were presented, which although assisting in identifying the broad spatial focus for study are not exhaustive and were not intended to preclude other areas from being considered or promoted.





The GBA Stage 2 feeds directly into HBC's site selection process, and it is therefore appropriate to undertake a more spatially focussed piece of work. However, there is no agreed approach to identifying sub-areas for this stage of assessment. We therefore reviewed experience elsewhere, and considered recent advice from PINS, in developing the methodology (see Section 2 and Appendix A).

Following discussions with Council Officers, it was agreed that the Green Belt Assessment would focus on those areas around the existing towns, larger villages and in the area proposed for the garden villages, as the most likely locations for significant growth. If as part of the ongoing work to develop the Local Plan, it becomes clear that significant growth (as opposed to infill development) might be expected within the lower order settlements or any other locations, such as sites currently designated as Key Green Belt sites, the Council will undertake additional work at that time to assess the potential Green Belt implications.

¹⁰ The GBA (2017) identified three weakly performing Green Belt parcels. During the course of the study, one of the Parcels (no.4) was removed from the Green Belt.

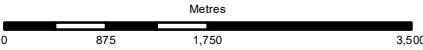


Legend

-  Green Belt Parcels (GBA)
-  Weakly performing parcels
-  Areas for potential sub-division for consideration in Stage 2
-  Hertsmere Borough Boundary

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P1	02/01/2019	JL	KF	KF
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(Stage 2)**

**Figure 3.2:
Recommendations
from the 2017 GBA**

Scale at A3
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Drawing No 3.2		

In order to define the areas for Green Belt assessment more precisely, the Council's emerging Hertsmere Housing and Economic Land Availability Assessment (HELAA)¹¹ sites database was reviewed in order to understand the extent of areas potentially available or promoted for development throughout the Borough¹². An assessment was undertaken to filter out those sites that are not aligned with the Council's identified development approaches. This was applied flexibly, for example to take into account: the potential for multiple smaller sites which, considered together as one larger site, could be deemed adjacent to a settlement; the presence of significant physical features that are likely to form a 'natural edge' to a settlement; or the spatial principles set out in the Council's Issues and Options Consultation Report. For example, if a proposal did not fit with the other spatial approaches proposed, it was excluded.

The Council received three Garden Village proposals during its consultation period, two of which have been assessed as Garden Villages (Section 5). However, one proposal to the north of South Mimms village was considered by the Council to be more akin to a village extension and was therefore assessed as a site.

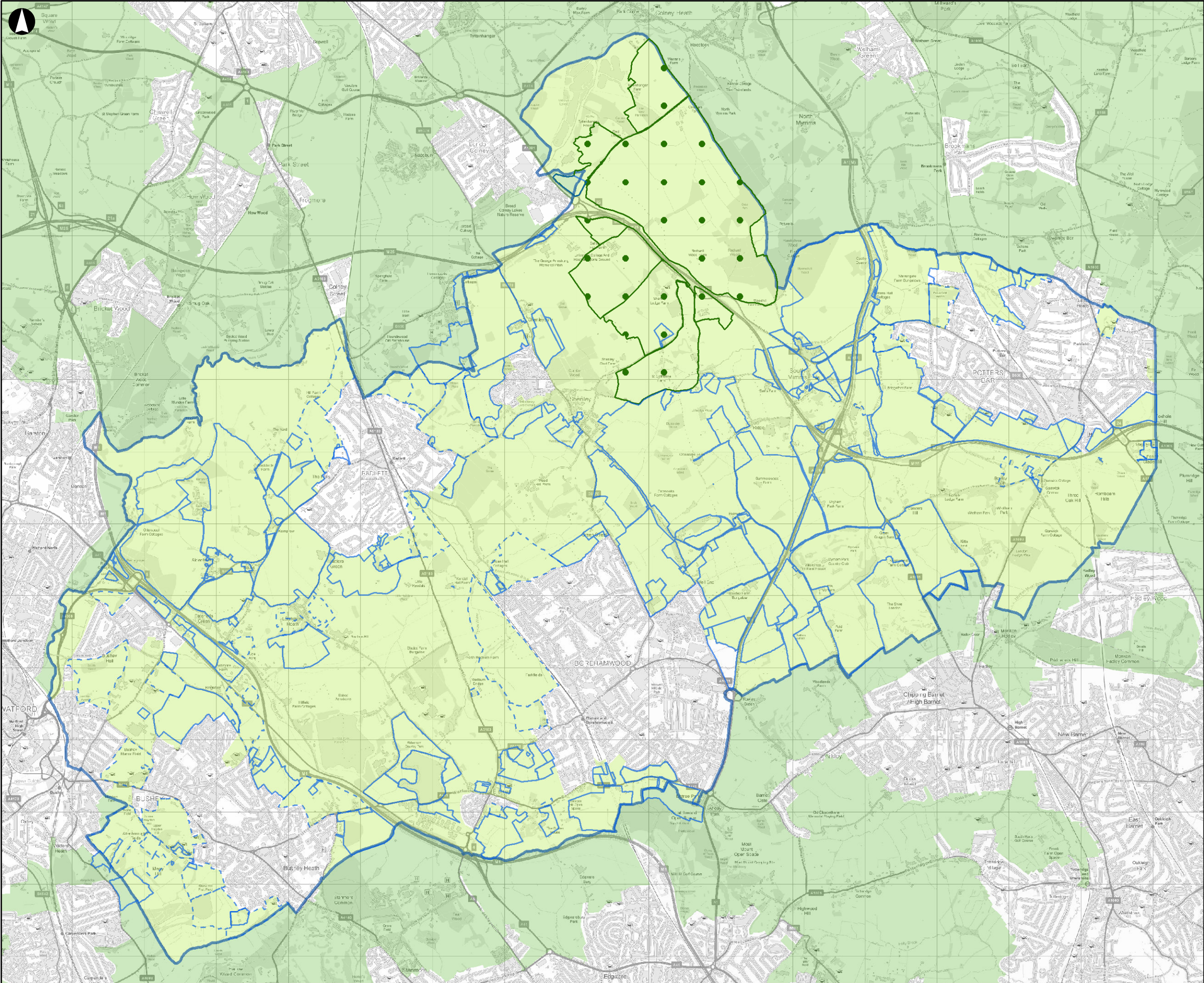
Additionally, reflecting on the implications of the Welwyn Hatfield Local Plan Examination, in order to ensure this Study is sufficiently exhaustive (ensuring that all 'reasonable options' are explored fully), 'further sites' were identified around potential growth settlements to supplement those recorded in the HELAA. A pragmatic and proportionate approach was taken to identifying these 'further sites', drawing on the outputs of the GBA Stage 1. 'Further sites' were not identified in a limited number of other areas, namely the strongest performing Green Belt Parcels where land has not specifically been promoted for development.

In addition, the GBA Stage 1 noted the particularly important role of the Green Belt in Hertsmere in preventing the merging of settlements. Around one third of Parcels were found to meet Purpose 2 strongly, forming gaps between settlements that tend to be 'small in scale and particularly sensitive to change'. For these Parcels, it was noted that 'development could result in the physical coalescence of non-Green Belt settlements'. As such, where smaller areas within Green Belt parcels categorically form the entirety of the physical gaps between identified non-Green Belt settlements, they were not considered for further assessment, nor were additional sites identified in these areas.

Figure 3.3 illustrates all of the HELAA sites, Garden Villages and further sites initially considered as part of Step 1. Maps are also provided on a settlement by settlement basis in Appendix B.

¹¹ Hertsmere Borough Council (2017), *Hertsmere Housing and Economic Land Availability Assessment 2017 Methodology*

¹² NB: The HELAA sites database used for the study, was an emerging document and represents a position in time (Spring 2018) with regards to the HBCs work on available sites. It will therefore not necessarily correspond with the final sites database used to develop the Local Plan strategy.

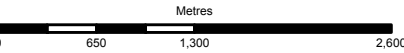


- Legend**
- HELAA Sites
 - Garden Village Sites
 - Further Sites
 - Hertsmere Borough Boundary
 - Hertsmere Green Belt
 - Neighbouring Green Belt

The HELAA sites database used for the study, was an emerging document and represents a position in time (Spring 2018) with regards to the HBC's work on available sites. It will therefore not necessarily correspond with the final sites database used to develop the Local Plan strategy.

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Figure 3.3:
HELAA Sites, Garden Villages and Further Sites Considered

Scale at A3
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Major Policy and Other Constraints

A filtering process to remove sites, which were entirely or largely constrained by major policy constraints was undertaken. Following discussions with council officers, these were defined as:

- Flood Zone 3b
- Sites of Special Scientific Interest (SSSI)¹³
- Ancient Woodland
- Historic Parks and Gardens
- Scheduled Monuments
- Historic Battlefields
- Specifically identified Local Nature Reserves or Local Wildlife Sites in Herts and Middlesex Wildlife Trust or Hertsmere Borough Council ownership or management¹⁴
- Land specifically held permanently in trust as public open space / park, identified as only applying to National Trust estates, Shenley Park and Bushey Manor Fields within Hertsmere's Green Belt

Locations affected by these constraints were mapped using GIS data supplied by HBC and used to refine definition of the sites (Figure 3.4).

Due to their scale and strategic nature, sites put forward as new Garden Villages were considered in their totality regardless of the presence of any major policy constraints. Given that detailed masterplans are not developed and the exact location of development undecided, there is scope for the major policy constraints to be designed into the schemes or mitigated.

3.3 Step 2: Sub-area Boundary Definition

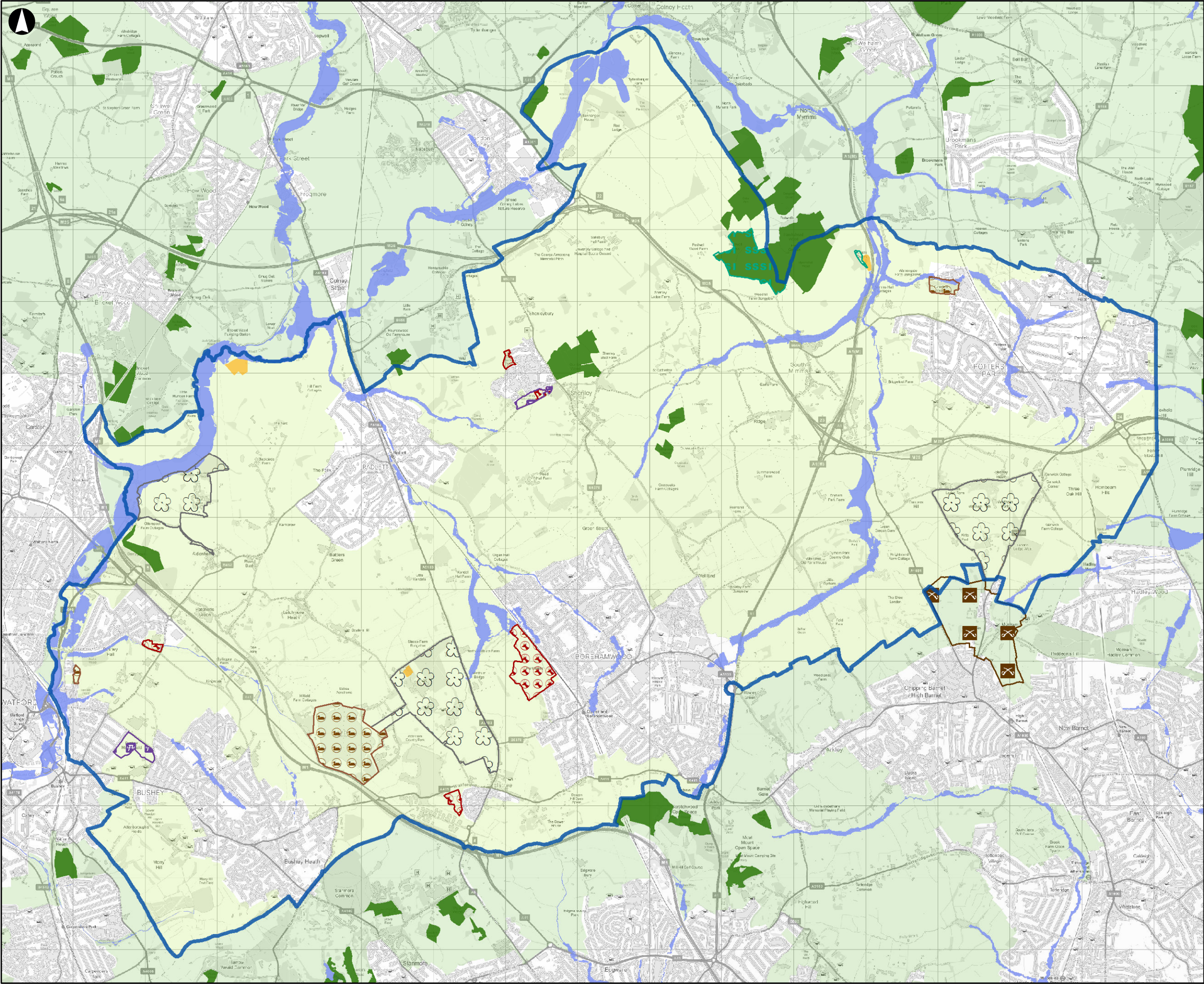
Given the requirement through paragraph 139 of the NPPF for Green Belt boundaries to be defined '*clearly, using physical features that are readily recognisable and likely to be permanent*', it therefore follows that sub-areas should be defined, to reflect these principles from the outset.

The process of defining the boundaries of the sub-areas was undertaken in line with the general principles used to identify the Parcels in GBA, however applied on a more flexible basis to reflect the more granular nature of the assessment.

Permanent and defensible boundary features, both man-made and natural, were again used (Table 3.1). Due to the more granular nature of the work, additional boundary features played a particularly important role in compartmentalising the Green Belt into smaller areas for further assessment.

¹³ Other sites of international and national nature conservation, i.e. Special Protected Areas, Special Areas of Conservation and Ramsar sites are not applicable in this borough.

¹⁴ In instances where it is confirmed that there is absolutely no intent to develop such sites and where they are to remain in perpetuity for the purpose of nature conservation.



Legend

Ancient Woodland

Historic Battlefields

Historic Parks and Gardens

Flood Zone 3

Land held in trust

Local Nature Reserves (HBC/HMWT)

Local Wildlife Sites (HBC)

Scheduled Monuments

SSSI

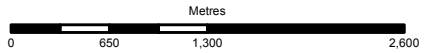
Hertsmere Green Belt

Neighbouring Green Belt

Hertsmere Borough Boundary

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Figure 3.4:
Major Policy Constraints
Considered in the Assessment

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Table 3.1 Boundary Features for Identifying Sub-areas

Permanent Man-made and Natural Features	Additional Boundary Features
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams, canals and other watercourses
Railways lines	Prominent physical/topographical features
Rivers, brooks and waterbodies	Existing development with strongly established, regular or consistent boundaries
	Well-established woodland edges, tree belts and hedgerows

Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps ‘birds eye’ views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement took into account the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number.

The final sub-areas are illustrated in Figure 3.5, as well as the proposed Garden Village sites for context. Settlement by settlement maps are also provided in Appendix C.

3.4 Step 3: Site Visits

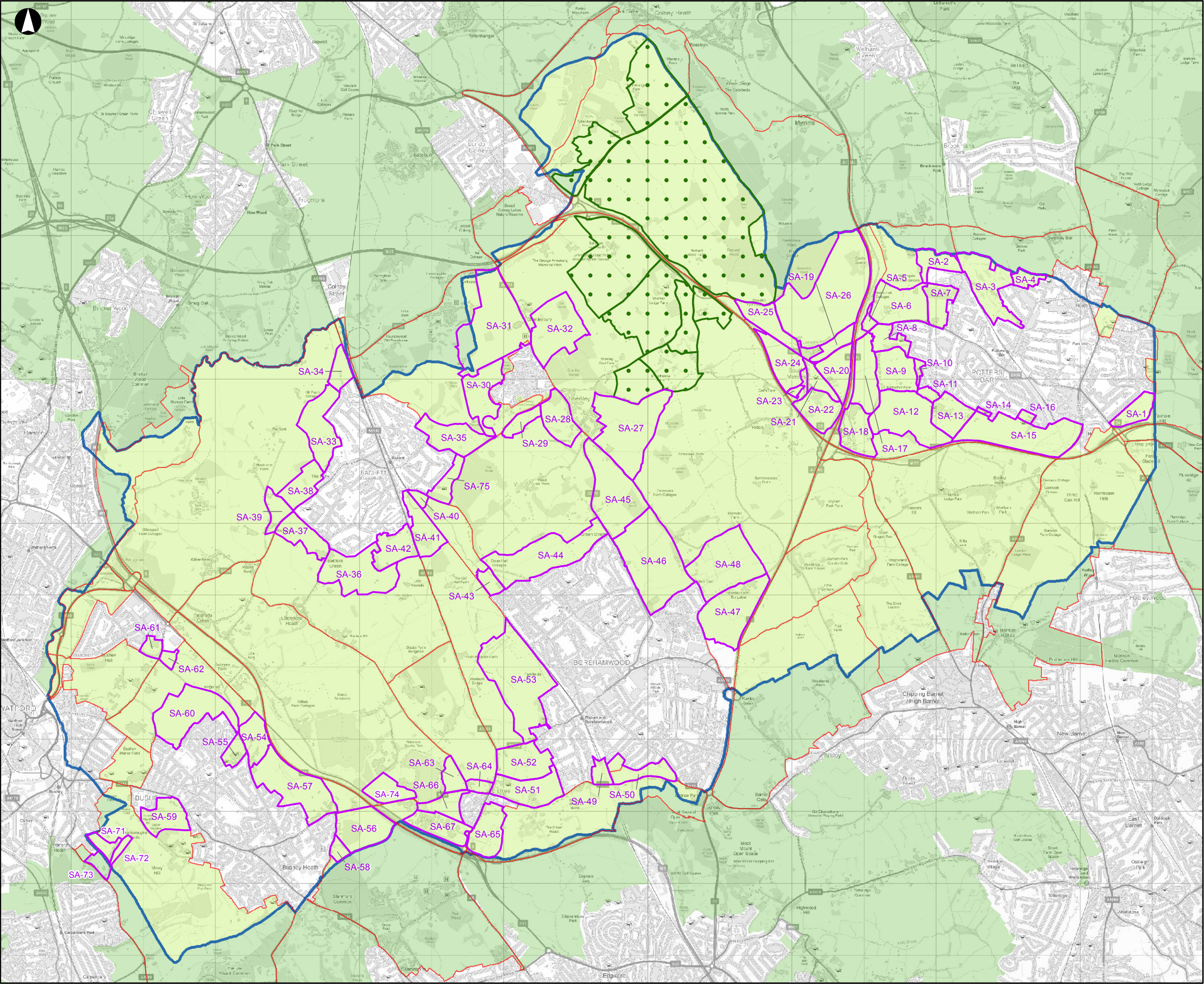
All sub-areas were visited to understand their immediate context, character and boundary features. Photographs of all sub-areas were taken (access permitting) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider Green Belt and adjacent settlements. Pro-formas for each sub-area were used to record the assessments against each criterion, together with observations from site visits and photographs.

3.5 Step 4: Sub-area Assessment

The assessment process involved a mixture of evidence from desk-based research, including contextual information and secondary data sources such as aerial photography, Google Streetview, and historic maps. This was supported by primary evidence obtained through the site visits.

The aim of the assessment was to establish any differentiation in terms of how sub-areas function and fulfil the purposes of the Green belt. The assessment of the sub-areas was undertaken in two steps:

- Step 4a: Assessment against the NPPF Purposes; and
- Step 4b: Appraisal of role and importance of the sub-area in terms of the function of the wider Green Belt, (taking into consideration the Parcel scores from the GBA).



Legend

Sub-Areas

Garden Village Sites

Green Belt Parcels (GBA)

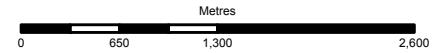
Hertsmere Borough Boundary

Hertsmere Green Belt

Neighbouring Green Belt

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**Figure 3.5:
Hertsmere Green Belt Sub-Areas,
Parcels and Garden Village Sites**

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Job No 261001-00	Drawing Status Issue
Drawing No 3.5	Issue P1

3.6 Step 4A: NPPF Purposes Assessment

As part of the methodology for the GBA, four of the five Green Belt purposes were considered. This approach was maintained for this part of the assessment. As such, each sub-area was assessed against NPPF Purposes 1-4:

1. **To check the unrestricted sprawl of the large built-up areas.**
2. **To prevent neighbouring towns merging into one another.**
3. **To assist in safeguarding the countryside from encroachment.**
4. **To preserve the setting and special character of historic towns.**

As with the GBA, no assessment of sub-areas was undertaken with regard to NPPF Purpose 5: **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.** Assessment against this purpose would not enable a distinction between sub-areas as all Green Belt achieves the purpose. It is difficult to distinguish the individual contribution that a single parcel of land makes to encouraging the re-use of urban land.

As with the GBA, one or more criteria were developed for each purpose using both qualitative and quantitative measures, and a score out of five attributed to each criterion (Table 3.2). For consistency with the GBA, each NPPF purpose was considered equally significantly, and therefore no weighting or aggregation of scores across the purposes was undertaken. As such, a composite judgement was necessary to determine where, overall, Green Belt sub-areas are meeting Green Belt purposes strongly or weakly.

Table 3.2 Criterion scores

Overall strength of Green Belt sub-area against criterion	Score	Equivalent Wording
	0	Does not meet criterion
	1	Meets criterion weakly or very weakly
	2	Meets criterion relatively weakly
	3	Meets criterion
	4	Meets criterion relatively strongly
	5	Meets criterion strongly or very strongly

Purpose 1

To check the unrestricted sprawl of the large built-up areas

In line with the GBA, the Purpose 1 criteria were applied in relation to the following identified large built-up areas in Table 3.3.

Table 3.3 Large Built-up Areas Used for the Purpose 1 Assessment

Hertsmere Large Built-Up Areas	Neighbouring Local Authority Large Built-Up Areas
Borehamwood ¹⁵	Greater London built-up area (including High Barnet (LB Barnet), Stanmore (LB Harrow) and Hadley Wood (LB Enfield)) Watford ¹⁶ St Albans Hatfield Hemel Hempstead

This assessment adopted the following definition of sprawl in line with the GBA: *‘the outward spread of a large built-up area at its periphery in a sporadic, dispersed and irregular way’*. The overall approach to assessing Purpose 1 was also maintained to ensure consistency with earlier work; however, the assessment criteria were expanded to reflect the finer grain of assessment.

The assessment considered:

1. Whether the Green Belt sub-area falls at the edge of one or more distinct large built-up area(s);
2. The degree to which the Green Belt sub-area is contained by built-form, and the nature of this physical containment, as well as the linkage to the wider Green Belt (including the presence of prominent physical features that would restrict the scale of outward growth and regularise potential development form);
3. The extent to which the edge of the built-up area has a strongly defined regular or consistent boundary.

Assessment 1(a)

A sub-area must abut one or more distinct large built-up areas in order to prevent development that would constitute sprawl. This criterion must therefore be met for Purpose 1 to be fulfilled. Reflecting the more granular scale of the GBA Stage 2 compared with the GBA, some sub-areas may not physically abut a large built-up area but may be visually or functionally linked to it. Therefore, judgement of whether a sub-area is at the edge of a large built-up area was taken on a flexible basis utilising professional judgement, taking into account whether sub-areas are located within identified buffer zones for large built-up areas.

¹⁵ For the purposes of this Study and to ensure consistency with the Local Plan, this includes the built-up area to the west of Elstree and Borehamwood railway station. Although the names ‘Elstree’ and ‘Borehamwood’ can be used interchangeably locally, this Study refers to the entire area as ‘Borehamwood’. This also distinguishes it from the settlement defined in the settlement hierarchy as ‘Elstree’, a separate settlement which is sometimes referred to locally as ‘Elstree Village’.

¹⁶ Includes the built-up area (within Hertsmere) to the north of Bushey railway station.

Assessment 1(b)

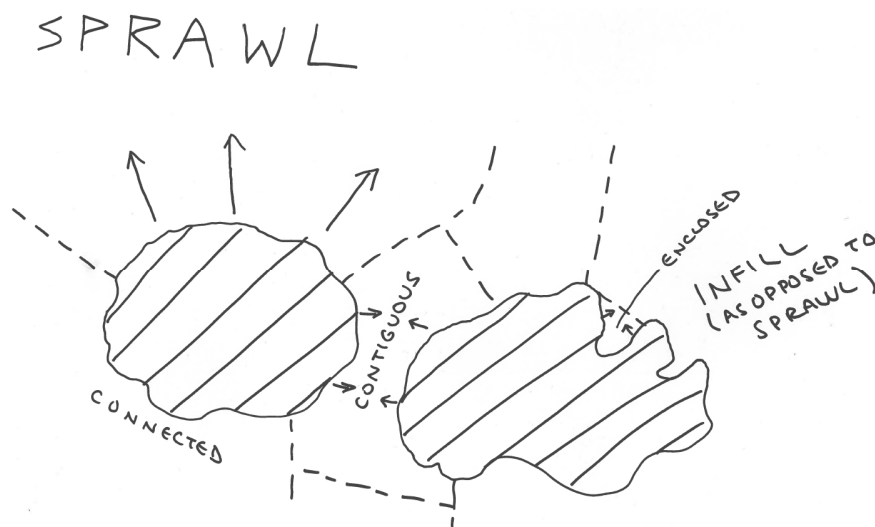
As stated at Assessment 1(a), Green Belt should function to protect open land at the edge of large built-up areas. However, the extent to which a sub-area prevents sprawl is dependent on:

- Its relationship with the respective built-up area(s); and
- The presence of prominent features in the Green Belt which might restrict the scale of outward growth and ensure development is regular and/or 'tidy'.

The assessment therefore focused on each of the aforementioned criteria, with the following criteria used for assessment, as illustrated in Figure 3.6:

- A sub-area predominantly surrounded or enclosed, either physically or perceptually, by two or more distinct large built-up areas, which also retains a strong link to the wider Green Belt, would play a particularly important role in preventing sprawl and would be identified as 'contiguous' (as illustrated in Figure 3.6).
- A sub-area displaying a low level of containment by a large built-up area, but still physically or perceptually abutting it, may prevent the outward sprawl of a large built-up area and would be identified as 'connected'; its importance for preventing sprawl would depend on the presence of prominent man-made and natural features that would restrict the scale of outward growth, both physically and in more perceptual terms (e.g. in terms of visual impact), and regularise development form.
- A sub-area almost entirely contained or surrounded by built development which forms part of a single built-up area and has limited connections to the wider Green Belt would only prevent sprawl to a limited extent (rather, potential development would likely be classified as infill); this is referred to here as 'enclosed' by a single built-up area.

Figure 3.6 Illustration of Connected, Contiguous and Enclosed



The NPPF states that Local Authorities should ‘define boundaries clearly, using physical features that are readily recognisable and likely to be permanent’

(paragraph 139). Where boundary features are identified at the edge of large built-up areas, sub-areas were assessed based on the following broad definitions:

- Where the built-form edge was ‘Regular’, comprising well defined or rectilinear built-form edges or where large built-up areas are bounded by more durable features that are likely to be permanent, it was judged that the Green Belt plays a lesser role in preventing sprawl, and as such no ‘+’ is assigned. Examples of such features include:
 - Infrastructure: motorway; public and man-made road; railway line; river.
 - Landform: stream, canal or other watercourse; prominent physical feature (e.g. reservoir embankment); woodland edges, tree belts and hedgerows; existing development with strongly established and regular boundaries.
- Where the built-form edge was ‘Irregular’, comprising ill-defined or softer edges or where large built-up areas are bounded by less durable, ‘softer’ features, a ‘+’ was assigned in recognition of the role of the Green Belt in preventing sprawl in the absence of an alternative barrier. Examples of such features include:
 - Infrastructure: private/unmade road; bridleway/footpath; power line.
 - Natural: field boundary; fragmented/inconsistent tree line or hedgerow.

For sub-areas where the boundary between the large built-up area and the Green Belt comprises a mixture of different types of physical features, or where sections of the edge are unbounded, a degree of professional judgement was employed in attributing the score.

Table 3.4 Purpose 1 Assessment Criteria

Purpose	Criteria	Scores
To check the unrestricted sprawl of large built-up areas	(a) Sub-area is at the edge of one or more distinct large built-up areas.	PASS: Sub-area meets Purpose 1. FAIL: Sub-area does not meet Purpose 1 and will score 0 for criteria (b)
	(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.	<p>5+: Sub-area is contiguous with two or more large built-up areas; or connected to a large built-up area, protecting land adjacent to the large built-up area from urban sprawl where there are no boundary features to restrict the scale of growth and regularise development form. The large built-up area(s) is/are predominantly bordered by features lacking in durability or permanence.</p> <p>5: Sub-area is contiguous with two or more large built-up areas; or connected to a large built-up area, protecting land adjacent to the large built-up area from urban sprawl where there are no boundary features to restrict the scale of growth and regularise development form. The large built-up area(s) is/are bordered by prominent, permanent and consistent boundary features.</p> <p>3+: Sub-area is connected to a large built-up area, however there are boundary features present which may restrict the scale of growth and regularise development form. The large built-up area is predominantly bordered by features lacking in durability or permanence.</p> <p>3: Sub-area is connected to a large built-up area, however there are boundary features present which may restrict the scale of growth and regularise development form. The large built-up area is predominantly bordered by prominent, permanent and consistent boundary features.</p> <p>1+: Sub-area is enclosed by a large built-up area which is predominantly bordered by features lacking in durability or permanence.</p> <p>1: Sub-area is enclosed by a large built-up area which is predominantly bordered by prominent, permanent and consistent boundary features.</p>

Purpose 2

To prevent neighbouring towns merging into one another

The Purpose 2 criterion (Table 3.6) is the same as that used in the GBA and considers the extent to which sub-areas form parts of gaps preventing towns from merging, and whether these parts play an essential or less essential role in terms of the overall gap. It was applied to sub-areas in the context of the settlements in Table 3.5.

This assessment considered the openness of the Green Belt, in terms of whether it can physically or visually accommodate growth without fundamentally compromising the gaps between settlements. In determining the extent to which a gap prevents coalescence, various factors were taken into consideration including distance, natural or man-made barriers and topography.

Table 3.5 Settlements for Purpose 2 Assessment

Hertsmere Settlements	Neighbouring Local Authority Settlements
Borehamwood ¹⁷	Bricket Wood
Bushey Heath / Bushey Village	Brookmans Park
Elstree ¹⁸	Chiswell Green
North Bushey	Colney Street
Potters Bar ¹⁹	Cuffley
Radlett	Great London built-up area (including High Barnet (LB Barnet), Stanmore (LB Harrow) and Hadley Wood (LB Enfield))
Shenley ²⁰	Hatfield
	Hemel Hempstead
	How Wood
	London Colney
	Park Street
	South Oxhey
	St Albans
	Watford ²¹
	Welham Green

¹⁷ For the purposes of this Study and to ensure consistency with the Local Plan, this includes the built-up area to the west of Elstree and Borehamwood railway station. Although the names 'Elstree' and 'Borehamwood' can be used interchangeably locally, this Study refers to the entire area as 'Borehamwood'. This also distinguishes it from the settlement defined in the settlement hierarchy as 'Elstree', a separate settlement which is sometimes referred to locally as 'Elstree Village'.

¹⁸ Comprising that part outside of the Green Belt sometimes referred to locally as 'Elstree Village'.

¹⁹ Including the immediately adjoining area within Welwyn Hatfield known as Little Heath.

²⁰ Comprising the Former Shenley Hospital development, removed from the Green Belt in the Site Allocations and Development Management Policies Plan (2016).

²¹ Includes the built-up area (within Hertsmere) to the north of Bushey railway station.

Table 3.6 Purpose 2 Assessment Criterion

Purpose	Criterion	Scores
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.	<p>5: An ‘essential gap’ between non-Green Belt settlements, where development would significantly visually or physically reduce the perceived or actual distance between them.</p> <p>3: A ‘wider gap’ between non-Green Belt settlements, where there may be scope for some development, but where the overall openness and the scale of the gap is important to restricting merging.</p> <p>1: A ‘less essential’ gap between non-Green Belt settlements, which is of sufficient scale and character that development is unlikely to cause merging between settlements.</p> <p>0: Sub-area does not provide a gap between any settlements and makes no discernible contribution to separation.</p>

Purpose 3

To assist in safeguarding the countryside from encroachment

The Purpose 3 criterion (Table 3.7) is the same as that used in the GBA and considers openness (in terms of extent of existing built development) and the degree to which the Green Belt can be characterised as countryside.

The approach to the Purpose 3 assessment is the same as that taken in the GBA. The percentage of built form within a Green Belt sub-area was calculated using GIS tools based on the land area of features that are classified as manmade (constructed) within the Ordnance Survey MasterMap data, excluding roads and railway lines. This data included buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures.

The score attributed to a sub-area was initially determined on the basis of the percentage built form. However, scores were then considered further in light of qualitative assessments of character, undertaken through site visits and revised as judged appropriate. This assessment considered, in particular, the extent to which a sub-area might be reasonably identified as ‘countryside’ / ‘rural’ (in line with the NPPF). In order to differentiate between different areas, broad categorisation was used to encompass assessments of land use (including agricultural use), morphology, context, scale and links to the wider Green Belt:

- ‘Strong unspoilt rural character’ was defined as land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.
- ‘Largely rural character’ was defined as land with a general absence of built development, largely characterised by rural land uses and landscapes but with some other sporadic developments and man-made structures.

- ‘Semi-urban character’ was defined as land which begins on the edge of the fully built up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
- ‘Urban character’ was defined as land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

Table 3.7 Purpose 3 Assessment Criterion

Purpose	Criterion	Score
Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.	<p>5: Contains less than 3% built form and possesses a strong unspoilt rural character.</p> <p>4: Contains less than 5% built form and/or possesses a strong unspoilt rural character.</p> <p>3: Contains less than 10% built form and/or possesses a largely rural character.</p> <p>2: Contains less than 15% built form and/or possesses a semi-urban character.</p> <p>1: Contains more than 15% built form and/or possesses an urban character.</p> <p>0: Contains more than 20% built form and possesses an urban character.</p>

Purpose 4

To preserve the setting and special character of historic towns.

The Purpose 4 criterion (Table 3.8) is the same as that used in the GBA and considers the extent to which a sub-area protects land in the immediate and wider context for a historic town. The approach to the Purpose 4 assessment was the same as that taken in the GBA. Two aspects are of particular importance with regard to assessment of Green Belt against Purpose 4:

- The role of the sub-area in providing immediate context for the historic town (along the boundary between the settlement and the Green Belt); and
- Contribution to views or vistas between the historic town and the surrounding countryside, looking both inwards and outwards where public viewpoints exist.

As with the GBA Stage 1, the following geographical areas were identified as being of relevance to this assessment:

- Bushey High Street Conservation Area, as identified in the Conservation Area Appraisal (2008); and

- Radlett (South) Conservation Area, as identified in the Conservation Area Appraisal (2012).

In the case of Bushey Village, it is considered that there is potential for a significant relationship between the historic core of this settlement (as defined by the Conservation Area Appraisals) and the adjoining Green Belt, whilst the Radlett (South) Appraisal notes the particular importance of this area in preserving the historic transition from the countryside to the centre further north. Whilst it is recognised that there are other historic villages with a clear relationship with the surrounding Green Belt, Purpose 4 relates to higher order settlements. Bushey Village forms part of the contiguous Tier 2 settlement of Bushey and Radlett is a Tier 3 settlement²², thus both merit being defined as Historic Towns for the assessment. Sub-areas directly adjoining these historic cores were therefore subject to assessment against Purpose 4.

The relative importance of particular landforms or landscape features to the setting and special character of a historic town was judged using the Bushey High Street Conservation Area Appraisal (2008) and Radlett (South) Conservation Area Appraisal (2012). Potential vistas were identified using Ordnance Survey contour maps and sense checked on site visits.

Table 3.8 Purpose 4 Assessment Criterion

Purpose	Criterion	Score
To preserve the setting and specific character of historic towns	Protects land which provides immediate and wider context for a historic town, including views and vistas between the town and surrounding countryside.	<p>5: Sub-area plays an important role in maintaining the unique setting of a historic town by providing unspoilt vistas of surrounding countryside from within the settlement or unbroken vistas into the settlement from afar and protects open land which has a strong connection with the historic core, contributing to its immediate historic setting.</p> <p>3: Sub-area plays an important role in maintaining the unique setting of a historic town by providing unspoilt vistas of surrounding countryside from within the settlements or unbroken vistas into the settlement from afar or protects open land which has a strong connection with the historic core, contributing to its immediate historic setting.</p> <p>1: Sub-area makes a limited contribution to the broader setting of a historic town by providing a countryside setting for a historic core which is inward facing and has a weak relationship with the surrounding countryside.</p> <p>0: Sub-area does not abut an identified historic town core.</p>

²² As set out in the Hertsmere Settlement Hierarchy (2013).

3.7 Step 4B: Wider Impact Assessment

In addition to assessment against the NPPF Purposes 1-4, a qualitative assessment was undertaken to identify the roles of the sub-areas as part of the GBA Parcel within which they are located and the wider Green Belt. Where relevant, the impact of the cumulative loss of adjacent sub-areas was also considered. The qualitative assessments considered the following:

- What is the role of the sub-area in the context of the GBA Parcel within which the sub-area is located? How does the performance of these areas compare? How important is the sub-area to the performance of the Parcel?
- Would the potential release of a sub-area impact on the assessment of the remaining Parcel and adjacent sub-areas or Parcel(s)? For example, would the scores of the adjoining sub-area(s), or of GBA Parcel within which the sub-area is located or adjacent to, be likely to change as a result of the sub-division and if so to what extent?
- Would the potential release of a sub-area harm the long-term protection or integrity of the surrounding Green Belt?

For sub-areas located on or over the Borough boundaries, consideration was given to neighbouring authority Green Belt assessments where available.

3.8 Step 4C: Consideration of Boundaries

The final assessment step considered whether release of the sub-area(s) would impact on the relative strength of the Green Belt boundary and whether any new boundary would be compliant (or could reasonably be made to be compliant through mitigation) with the requirements of paragraph 139 of the NPPF for boundaries to be defined ‘clearly, using physical features that are readily recognisable and likely to be permanent’.

The relative strength of boundaries was not a determining factor in the final categorisation (as shown in Figure 3.1), given it may be possible in certain circumstances to secure mitigation to strengthen currently weak boundaries or to provide new boundaries where gaps exist (e.g. through a site allocation policy). While it is noted where this might be required in the final recommendations, the decision on the appropriateness of strengthening existing, or creating new, boundaries will be for the Council to make, taking into account how such mitigation might be secured.

3.9 Step 5: Categorisation

Following the assessment of the sub-areas against the NPPF Purposes (Step 4A) and assessment of the impacts on the wider strategic Green Belt (Step 4B), each sub-area was categorised as shown in Table 3.9.

In line with the GBA, overall performance against the purpose assessment criteria was determined as follows:

- Any sub-area scoring strongly or very strongly (4 or 5) against the criteria for one or more NPPF purpose was judged to meet the purpose assessment criteria strongly;
- Any sub-area scoring moderately (3) against at least one NPPF purpose and failing to score strongly against any purpose (4 or 5) was judged as meeting the purpose assessment criteria moderately; and
- Any sub-area scoring weakly or very weakly (1 or 2) across all NPPF purposes was judged to meet the purpose assessment criteria weakly.

For each sub-area, an overall conclusion was made on the level of contribution to the wider strategic Green Belt – important or less important. This was judged qualitatively, based on a composite judgement of the factors described at section 3.7:

- The significance of a sub-area's role when compared with the wider GBA Green Belt Parcel;
- The impact on the performance of (the) adjoining sub-area(s) or wider Green Belt Parcel(s) against the Purposes;
- Potential harm upon the long-term protection or integrity of the surrounding Green Belt if the sub-area were to be removed from the Green Belt.

The categorisation identified which sub-area, combination of sub-areas, or part of sub-area should be considered further at Step 6.

In some instances, the unique circumstances of the sub-area meant a bespoke categorisation was required; for example, where only part of the sub-area was considered appropriate for further consideration. Details of such instances are recorded in the assessment pro-formas.

Table 3.9 Sub-area Categorisation

Meets Purpose Assessment Criteria	Contribution to Wider Strategic Green Belt	Categorisation
Strongly	Important	Not recommended for further consideration
Strongly	Less important	Recommended for further consideration
Strongly	Partly less important	Part recommended for further consideration
Moderately	Important	Not recommended for further consideration
Moderately	Less important	Recommended for further consideration
Moderately	Partly less important	Part recommended for further consideration
Weakly	Important	Not recommended for further consideration
Weakly	Less important	Recommended for further consideration

The Categorisation process recognises the potential existence of sub-areas, which meet one or more of the Green Belt purposes strongly but that overall make a lesser contribution to the Purposes when compared with the wider Green Belt Parcel in which they lie; or where, if removed from the Green Belt, it is unlikely that there would be harm upon the function or integrity of the surrounding Green

Belt Parcel(s) or sub-area(s). Conversely, it also reflects the possibility for sub-areas which meet the Purpose Assessment Criteria weakly but that are integral to maintaining the protection or integrity of the surrounding Green Belt.

3.10 Step 6: Recommendations

Following the categorisation of sub-areas, recommendations were made for each sub-area, combination of sub-areas, or part of sub-area categorised as requiring further consideration. This included drawing on the consideration of boundary features undertaken in Step 4C.

Each recommended sub-area was assigned a unique reference number given the recommendations could comprise a whole sub-area, combination of sub-areas or part of sub-area.

4 Key Findings of the Assessment and Categorisation

This section summarises the key findings from the assessment of the 72 sub-areas against the NPPF purposes (Step 4A), consideration of the role of the sub-areas as part of the wider strategic Green Belt (Step 4B), and consideration of boundaries (Step 4C), together with the categorisation of each sub-area (Step 5).

The detailed pro-formas setting out the assessments for each sub-area can be found in Annex Report 1.

4.1 Step 4A: Assessment of Sub-Areas against Purposes 1-4 of the NPPF

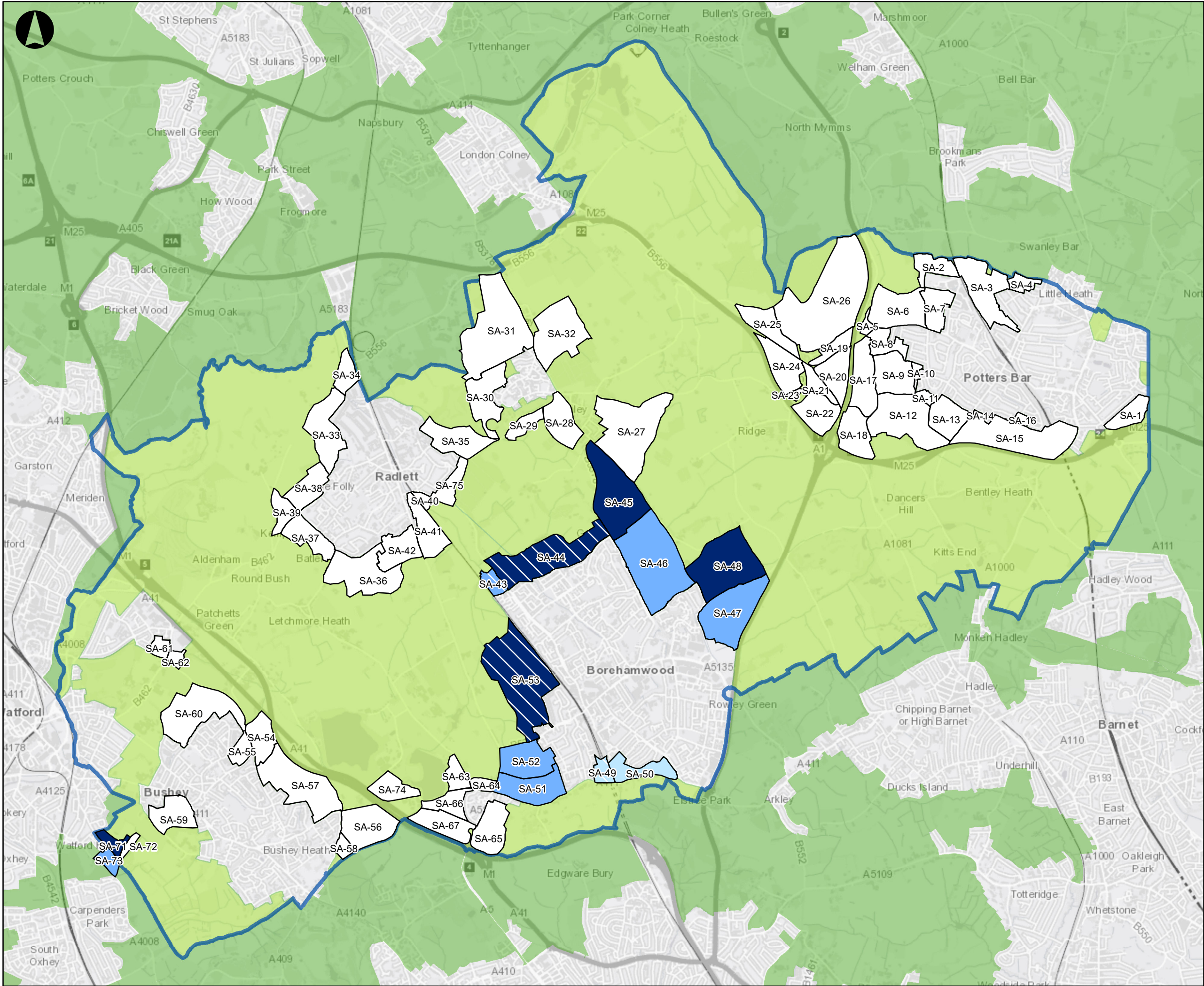
4.1.1 Purpose 1 Assessment: To check the unrestricted sprawl of large built-up areas

The findings of the Purpose 1 assessment are summarised in Table 4.1 and illustrated spatially in Figure 4.1. Additionally, settlement level spatial illustrations of the Purpose 1 scores can be found in Appendix D.

Five of the sub-areas (7%) were identified as performing strongly against Purpose 1, scoring 5 or 5+, by preventing the outward sprawl of large built-up areas. As Borehamwood is the only settlement considered a large built-up area, these sub-areas are concentrated in the south of the District, particularly located to the north, north-east and west of this settlement.

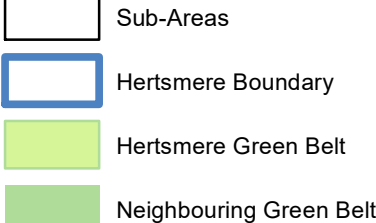
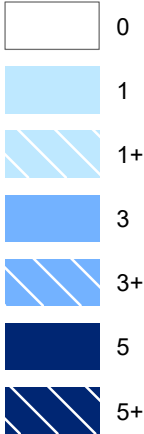
Table 4.1 Purpose 1 Summary of Scores

Purpose 1 Score	Number of Sub-areas	Sub-areas
5+	2	44, 53
5	3	45, 48, 71
3+	1	43
3	5	46, 47, 51, 52, 73
1+	1	49
1	1	50
0	59	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 72, 74, 75



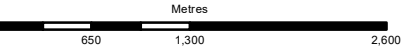
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Purpose 1b Scores



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P3	10-10-18	IN	ML	KF
Issue	Date	By	Chkd	Appd



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

**Figure 4.1
Purpose 1 Scores: Hertsmere**

Scale at A3
1:50,000

Job No 261001-00	Drawing Status Issued
Drawing No 001	Issue P3

Six of the sub-areas (8%) were identified as performing moderately against Purpose 1, scoring 3 or 3+. Moderately performing sub-areas are generally clustered to the north-east and south-west of Borehamwood.

Two of the sub-areas (3%) were identified as performing weakly against Purpose 1, scoring 1 or 1+. These are 'enclosed' within the large built-up area of Borehamwood, and therefore do little to prevent sprawl. Enclosed sub-areas are located to the south of Borehamwood.

Fifty-nine of the sub-areas (82 %) are not connected to an identified large built-up area, either physically or perceptually, and do not directly prevent sprawl, therefore fail to meet Purpose 1.

4.1.2 Purpose 2 Assessment: To prevent neighbouring towns from merging

The findings of the Purpose 2 assessment are summarised in Table 4.2 and illustrated spatially in Figure 4.2. Additionally, settlement level spatial illustrations of the Purpose 2 scores can be found in Appendix E.

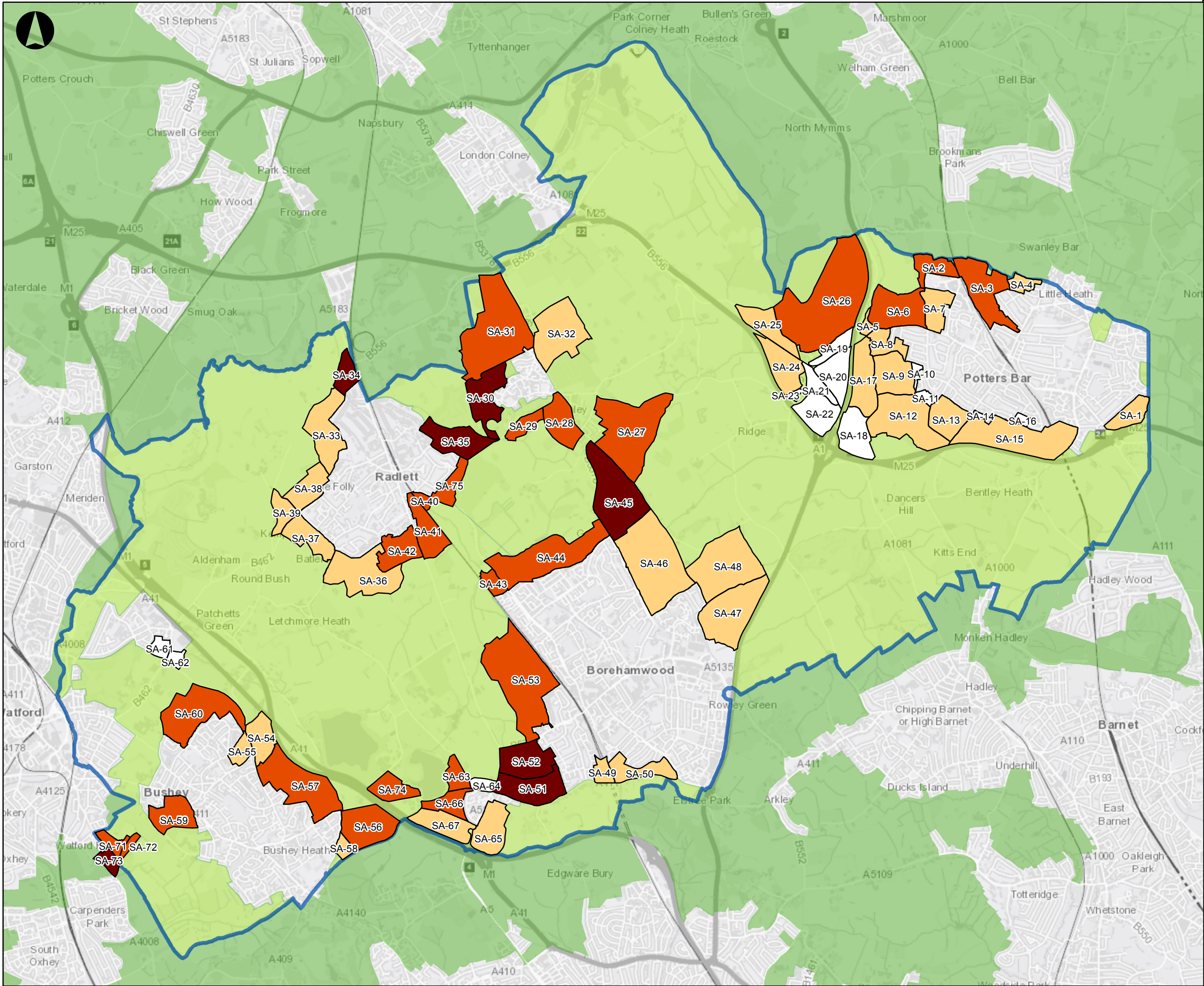
Table 4.2 Purpose 2 Summary of Scores

Purpose 2 Score	Number of Sub-areas	Sub-areas
5	7	30, 34, 35, 45, 51, 52, 73
3	24	2, 3, 6, 26, 27, 28, 29, 31, 40, 41, 42, 43, 44, 53, 56, 57, 59, 60, 63, 66, 71, 72, 74, 75
1	28	1, 4, 5, 7, 8, 9, 12, 13, 15, 17, 24, 25, 32, 33, 36, 37, 38, 39, 46, 47, 48, 49, 50, 54, 55, 58, 65, 67
0	13	10, 11, 14, 16, 18, 19, 20, 21, 22, 23, 61, 62, 64

Seven of the sub-areas (10%) were identified as performing strongly against this Purpose by preventing settlement from merging, scoring 5. These sub-areas are predominantly located to the south-west of Borehamwood, north and north-east of Radlett and to the east and south-west of Shenley.

While this constitutes a relatively small proportion in terms of the number of sub-areas, it is noted that several of these are of a substantive scale, or are located in particularly narrow, sensitive gaps between settlements.

Twenty-four of the sub-areas (33%) were identified as performing moderately against Purpose 2, scoring 3. These sub-areas form smaller parts of gaps, which although are not 'essential' for preventing the merging of settlements, nonetheless contribute to the openness and general scale of these overall gaps. These sub-areas are generally clustered to the north-west and west of Borehamwood, to the north-west of Potters Bar, to the south-west of Radlett and fully surrounding Bushey and Shenley



Legend

Purpose 2 Score



0



1



3



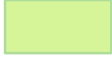
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Sub-Areas



Hertsmere Boundary



Hertsmere Green Belt

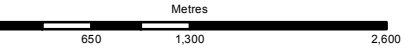


Neighbouring Green Belt

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P2	11-10-18	ER	ML	KF
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Issue	Date	By	Chkd	Appd
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Job Title
**Hertsmere Green Belt Assessment
(Stage 2)**

**Figure 4.2
Purpose 2 Scores: Hertsmere**

Scale at A3
1:50,000

Job No 261001-00	Drawing Status Issue
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Drawing No 001	Issue P2
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Twenty-eight of the sub-areas (39%) perform weakly against Purpose 2, scoring 1 as a result of their relatively limited scale, or as a result of physical or topographical features which restrict the potential for coalescence. These sub-areas are predominantly located to the north-east of Borehamwood, north-east of Bushey, south and west of Potters Bar, south-west and west of Radlett and to the west of the washed over village of South Mimms.

A further 13 of the sub-areas (18%) make no discernible contribution to the separation of settlements and do not meet Purpose 2, scoring 0. These sub-areas are generally so small in scale that they play a very limited role as part of larger-scale gaps between settlements. In some instances, these sub-areas were so closely associated with existing settlements, and already subject to development, that they are effectively enveloped within the built area, and therefore do not form part of the gap with another settlement. It should be noted that these sub-areas, collectively, form a small proportion of Green Belt in terms of the amount of land they cover.

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

The findings of the Purpose 3 assessment are summarised in Table 4.3 and illustrated spatially in Figure 4.3. Additionally, settlement level spatial illustrations of the Purpose 3 scores can be found in Appendix F.

Table 4.3 Purpose 3 Summary of Scores

Purpose 3 Score	Number of Sub-areas	Sub-areas
5	5	12, 29, 30, 38, 72
4	16	5, 9, 24, 25, 26, 27, 28, 32, 33, 34, 36, 44, 45, 48, 50, 60
3	27	1, 4, 6, 8, 11, 15, 17, 19, 20, 23, 31, 37, 40, 41, 42, 43, 46, 47, 49, 56, 62, 63, 65, 66, 71, 74, 75
2	17	2, 3, 10, 13, 21, 22, 35, 39, 51, 52, 53, 54, 57, 58, 59, 64, 73
1	1	7
0	6	14, 16, 18, 55, 61, 67

66 sub-areas meet this purpose to a greater or lesser extent, reflecting the relatively high level of openness across much of the Green Belt within Hertsmere Borough.

Five of the sub-areas (7%) were identified as performing very strongly against this Purpose, scoring 5. A further 16 sub-areas (22%) were identified as performing strongly against Purpose 3, scoring 4. These sub-areas were predominantly located around north-east and north-west of Borehamwood, north of Bushey, to the west of Potters Bar, to the south and east of Radlett and surrounding Shenley, opening out into a wider band of unspoilt countryside.

Twenty-seven of the sub-areas (38%) were identified as performing moderately against this Purpose, scoring 3. Although these sub-areas are distributed widely across the Borough, they are generally clustered to the north-east of Borehamwood, to the south and north-west of Potters Bar, south-east of Radlett and to the east of South Mimms. These sub-areas include areas of open countryside that are subject to some occasional urbanising influences, or contain distinct areas with a contrasting, more urbanised character. A number of sub-areas reflect a more rural character in terms of their functional land-uses but may have limited physical or visual connections to the wider countryside and a stronger relationship with adjacent urban areas.

Seventeen of the sub-areas (24%) were identified as performing weakly, scoring 2, with a further one sub-area (1%) performing very weakly, scoring 1. Six sub-areas overall (8%) scored 0 as a result of their fully urban character. This relatively high proportion of weakly scoring sub-areas reflects the focus of the assessment on smaller-scale areas of Green Belt around the edges of settlements, and to some extent the level of fragmentation of the overall Green Belt around Hertsmere Borough. These sub-areas are generally focussed to the west of Borehamwood, north-east of Bushey, north-west of Potters Bar, east of Radlett, and south of South Mimms. These areas have already experienced encroachment and possess semi-urban or urban characteristics with higher levels of built form interspersed amongst some areas of open land.

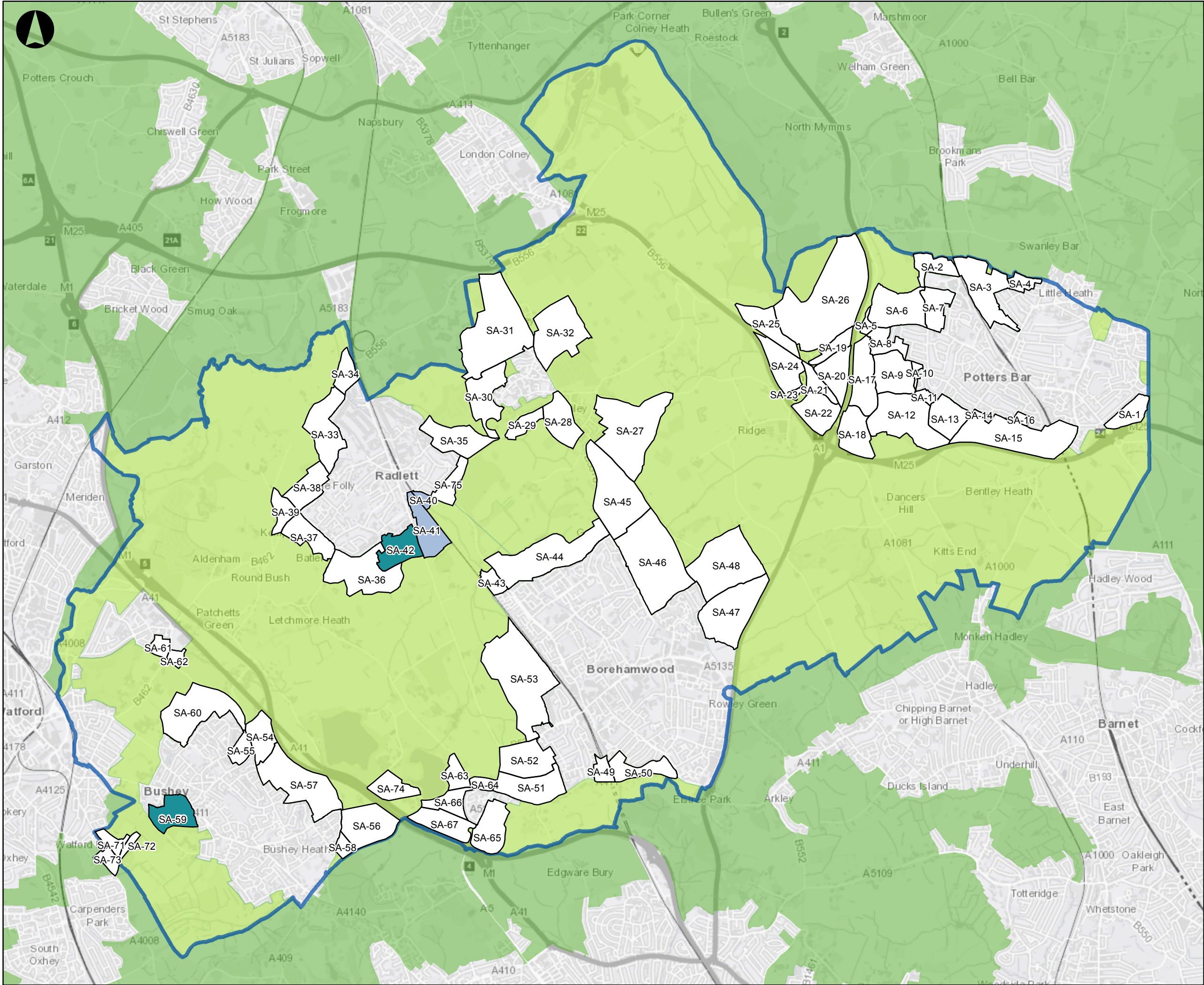
4.1.4 Purpose 4 Assessment: To preserve the setting and special character of historic towns

The findings of the Purpose 4 assessment are summarised in Table 4.4 and illustrated spatially in Figure 4.4. Additionally, settlement level spatial illustrations of the Purpose 4 scores can be found in Appendix G.

Table 4.4 Purpose 4 Summary of Scores

Purpose 4 Score	Number of Sub-areas	Sub-areas
3	2	42, 59
1	2	40, 41
0	68	1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 60, 61, 62, 63, 64, 65, 66, 67, 71, 72, 73, 74, 75

Two of the sub-areas (3%) were identified as performing moderately against this Purpose, scoring 3. These sub-areas directly abut or overlap with either Radlett's historic core or the Conservation Areas in Bushey, contributing to a strong connection and maintaining immediate historic character.



Legend

Purpose 4 Score



0



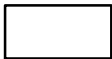
1



3



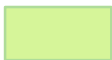
5



Sub-Areas



Hertsmere Boundary



Hertsmere Green Belt

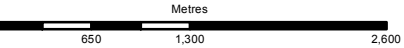


Neighbouring Green Belt

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P1	16-10-18	ER	ML	KF
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Issue	Date	By	Chkd	Appd
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Client
Hertsmere Borough Council

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

**Figure 4.4
Purpose 4 Scores:
Hertsmere**

Scale at A3
1:50,000

Job No 261001-00	Drawing Status Issue
Drawing No 007	Issue P1

A further two sub-areas (3%) were identified as performing weakly against this Purpose, scoring 1. These sub-areas make a limited contribution to the broader setting of Radlett's historic core. The majority of the sub-areas, totalling 68 (94%), do not abut an identified historic settlement core and therefore do not meet this Purpose.

4.2 Step 4B: Strategic Green Belt Assessment

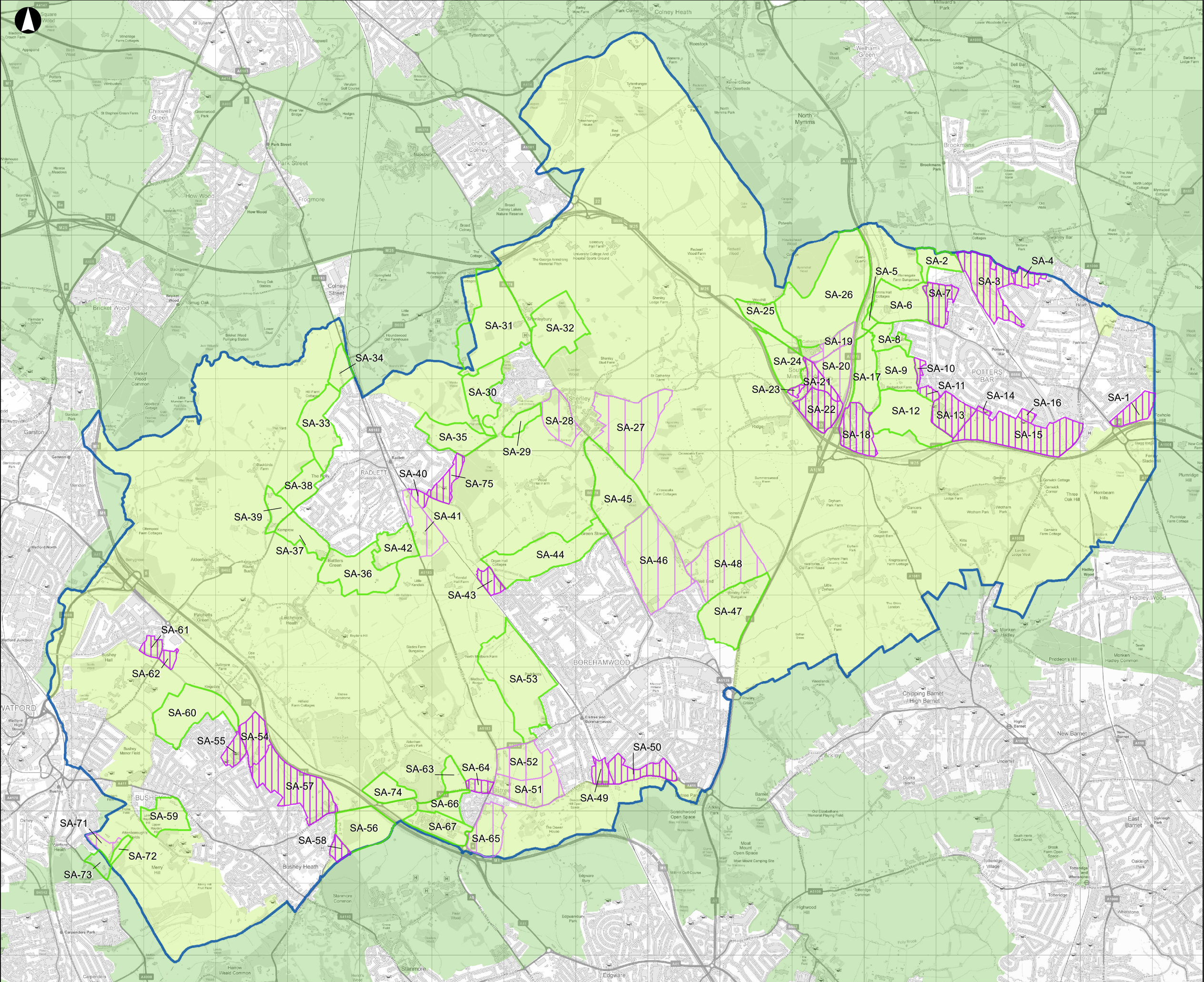
Reflecting the more granular focus of the GBA, additional qualitative assessment was undertaken to identify the role of sub-areas as part of the wider strategic Green Belt parcels within which they are located. A summary of the strategic assessment is provided in Table 4.5 and illustrated spatially in Figure 4.5. Just under half of the sub-areas make an important contribution to the wider strategic Green Belt.

Table 4.5 Strategic Green Belt Assessment Summary

Contribution to Wider Strategic Green Belt	No. Sub-areas	Sub-areas
Important	35	2, 5, 6, 8, 9, 12, 17, 24, 25, 26, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 42, 44, 45, 47, 53, 56, 59, 60, 63, 66, 67, 72, 73, 74
Less important	26	1, 3, 4, 7, 10, 11, 13, 14, 15, 16, 18, 21, 22, 23, 40, 43, 49, 50, 54, 55, 57, 58, 61, 62, 64, 75
Partly less important	11	19, 20, 27, 28, 41, 46, 48, 51, 52, 65, 71

4.3 Step 4C: Boundary Considerations

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.



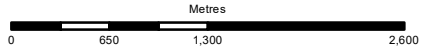
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Sub-Areas - Contribution to Wider Strategic Green Belt

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

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(Stage 2)**

**Figure 4.5:
Strategic Assessment
Findings**

Scale at A3	1:50,000
Job No 261001-00	Drawing Status Issue
Drawing No 4.5	Issue P1

4.4 Step 5: 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. A summary of the categorisation is provided in Table 4.6 and illustrated spatially in Figure 4.6.

Table 4.6 Summary of Categorisation

Meets Purpose Assessment Criteria	Contribution to Wider Strategic Green Belt	Categorisation	No. Sub-areas	Sub-areas
Strongly	Important	Not recommended for further consideration	20	5, 9, 12, 24, 25, 26, 29, 30, 32, 33, 34, 35, 36, 38, 44, 45, 53, 60, 72, 73
Strongly	Less important	Recommended for further consideration	1	50
Strongly	Partly less important	Part recommended for further consideration	6	27, 28, 48, 51, 52, 71
Moderately	Important	Not recommended for further consideration	13	2, 6, 8, 17, 31, 37, 42, 47, 56, 59, 63, 66, 74
Moderately	Less important	Recommended for further consideration	12	1, 3, 4, 11, 15, 23, 40, 43, 49, 57, 62, 75
Moderately	Partly less important	Part recommended for further consideration	5	19, 20, 41, 46, 65
Weakly	Important	Not recommended for further consideration	2	39, 67
Weakly	Less important	Recommended for further consideration	13	7, 10, 13, 14, 16, 18, 21, 22, 54, 55, 58, 61, 64

A number of sub-areas which scored moderately or strongly against NPPF Purposes were found to play a less important role in relation to the wider strategic Green Belt (13 in total). Conversely, only two sub-areas, which scored weakly against NPPF purposes were found to play an important role in relation to the wider strategic Green Belt.

A number of sub-areas which scored moderately or strongly against the NPPF Purposes contained smaller areas which on their own made a less important contribution to the wider Strategic Green Belt (11 in total).

Drawing No	Issue
4.5	P1

5 Garden Village

As part of the study, two Garden Village proposals were assessed, Redwell Garden Village and Rabley Green, both shown in Figure 5.1. The assessment for each Garden Village proposal follows and should be read alongside Section 6 (Recommendations).

5.1 Redwell Garden Village

The proposed Redwell Garden Village comprises land located to the east of London Colney and to the north-west of Potters Bar and South Mimms. It encompasses land both to the north and south of the M25. For the purposes of this assessment it has been divided into six areas, which are illustrated in Figure 5.1, along with Green Belt sub-areas for context.

5.1.1 Description of Areas and Boundaries

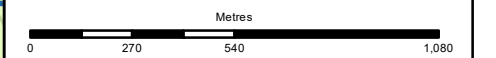
Due to the scale of the proposed Redwell Garden Village, its boundary features vary in terms of their strength and permanence. Areas -a, -b and -c lie to the north of the M25. Area a is bounded by weaker boundaries to the north and east, formed of dispersed /intermittent treelines and low-lying hedgerow, as well as to the west, where the boundary is formed of The New Plantation access road. The southern boundary, Coursers Road, is a more defensible and permanent boundary. Area b also has weaker boundaries to the north and west (along the edge of Willows Activity Farm) formed of dispersed treelines and low-lying hedgerow. To the south and south-west, Coursers Road and the London Colney Bypass (A1081), are defensible and permanent boundaries.

Area-c, which constitutes the largest part of the Redwell Garden Village, is bounded by dense woodland along much of its north-eastern and eastern boundary, to the north-east, an access road and Blackhorse Lane to the south-east, the M25 to the south and south-west, and Coursers Road to the west. Area-c is therefore bounded by durable and readily recognisable features.

The two larger areas located to the south of the M25 (-d and -e) are bounded to the north and north-east by Ridge Hill (B556), which forms a durable and readily recognisable boundary feature. Area-d and -e are separated by a series of densely wooded plantations, as well as an intermittent treeline. Additionally, area-d slopes south-eastwards towards this boundary between the two areas, rising from approximately 75m at Salisbury Hall Farm to approximately 100m; there are therefore limited visual linkages between these areas. Rectory Lane forms a durable and readily recognisable feature along the eastern edge of area-e. The outer boundaries of these areas to the west and north-west are defined by public footpaths. These are less readily identifiable, intermittently reinforced by dispersed treelines and low-lying hedgerow.

Area-f is bounded by durable and readily recognisable features to the north and west by the M25 and Packhorse Lane, respectively. The remaining boundaries are weaker formed of a dispersed treeline to the west and partially to the south, and a poorly defined field boundary to the east and partially to the south.

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Issue	Date	By	Chkd	Appd



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

Figure 5.1 Garden Village Areas and Sub-Areas

Scale at A3	
1:20,000	
Job No 261001-00	Drawing Status Issue
Drawing No 5.1	Issue P1

5.1.2 Purpose 1

The proposed Redwell Garden Village is not at the edge of a distinct large built-up area, in physical or perceptual terms, and therefore does not make a contribution to preventing sprawl.

5.1.3 Purpose 2

The six areas of the proposed Redwell Garden Village play differing roles in maintaining the gaps between settlements (Purpose 2).

The northern areas (-a and -b) form part of the wider gap between London Colney and Colney Heath. There may be scope for some development but the overall openness and scale of the gap is important in restricting the merging of the settlements. Aside from a wooded plantation to the north of area-b, there are limited physical or man-made features that would prevent actual or perceptual coalescence, particularly given the potential for perception of ribbon development along Coursers Road. These areas would also play a particularly important role in preventing physical merging between the proposed Redwell Garden Village and both London Colney and Colney Heath.



Photo 5.1 Facing east from the south-eastern part of Area-c, illustrating long views towards South Mimms and Potters Bar in the southern part of this area.

Collectively, areas -b and -c form the part of the wider gap between London Colney and Potters Bar, Welham Green and Brookmans Park. There may be scope for some development between these settlements but the areas collectively maintain the overall openness and scale of the gap. Subject to maintaining a physical buffer between the proposed Redwell Garden Village and London Colney (area-b and the westernmost part of area-c), as well as a perceived sense of

separation and distinction between these settlements, the overall gap between these settlements would not be compromised. It is also noted that rising topography to the south-east of area-c, along with Mymmshall Wood and Redwell Wood along its south-eastern boundary, would limit any visual connection between Potters Bar and the proposed Redwell Garden Village and prevent the physical coalescence of these settlements. Visual (and perceived) links to Welham Green and Brookmans Park to the east are screened by the adjoining dense woodland, including Walsingham Wood and Cobs Ash.

The areas to the south of the M25 (-d, -e and -f) form part of the wider gap between London Colney and Shenley. The southern part of the proposed Redwell Garden Village plays a particularly important role in maintaining the scale and openness of this gap, though there is no direct intervisibility between these areas and Shenley to the south as a result of the rising topography, combined with Combe Wood to the south.

Overall, area-f plays a less important role in preventing coalescence as a result of its relatively small scale (though should be considered 'cumulatively' in the context of area-h and area-i, located immediately to the west).

It is also noted that, collectively, areas -b, -c, -d, -e and -f form much of the gap between London Colney and Shenley, and the washed over village of South Mimms, preventing development that would significantly visually and physically reduce the actual distance between these settlements. While there are currently no visual links between the two settlements, additional development or ribbon development may contribute to a perceived reduction in the scale of the gap between these settlements. This is particularly relevant to areas -d, -e and -f, which prevent ribbon development along Ridge Hill (B556).

5.1.4 Purpose 3

Approximately 12% of the proposed Redwell Garden Village is covered by built form, although significant parts are or have been subject to mineral extraction. At present, the proposed location for the Redwell Garden Village predominantly comprises agricultural fields, horse paddocks, fragmented woodland and dispersed agricultural development. The character, however, does vary across the individual areas.

Areas -a and -b predominantly comprise open agricultural fields and dispersed farm buildings/structures. The Garden Wood separates the two areas, limiting intervisibility between the two areas, and creating a sense of visual containment (particularly in area-b). This dense woodland, in combination with the Willows Lakes to the north-west limits longer views and connection with the wider countryside for area-b, creating a sense of enclosure.

Although the two areas have similar land uses, the rurality of area-b is diminished as a result of direct visual links to existing built form immediately to the west, in particular Willows Activity Farm and adjoining car park, along with the Willows Farm Day Nursery & Pre-school. There are also direct views towards London Colney immediately to the south, which is a further urbanising influence.

Area-c forms a large swathe of open agricultural land, with dense woodland along its eastern edge and a mineral extraction site to the west. There are also two servicing plants for anaerobic digestion and composting within the promoted area; the South Mimms IVC Facility, and the North London ID Facility. The area contains little built form, limited to Coursers Farm located in the northern corner, and predominantly consists of dispersed agricultural uses throughout its centre. The large scale and openness of the area contribute to a strong unspoilt rural character. As a result of the rising topography to the south-east, there are long views into the wider countryside to the east, with some visual links to the built form of Potters Bar in the distance. Similarly, there are long views to the west over the area of mineral extraction in the west, creating a sense of connection to the wider strategic countryside. Views to the north and north-east are, however, interrupted by the dense woodland bordering the eastern edge of the area.

The falling topography towards the central southern part of the area forms a 'bowl' in the landscape. As a result of the raised surrounding topography and limited visual links with the rest of the site and surrounding countryside, this area has a strong sense of visual containment and fewer links to the wider countryside. Despite its broadly rural character, the close physical and visual links to the M25 are a strong urbanising influence which diminishes the overall sense of rurality.



Photo 5.2 Facing east from Coursers Farm Road across the northern part of Area-c, illustrating dense woodland which restricts views towards the wider countryside.

To the south of the M25, area-d predominantly comprises open agricultural fields, separated by hedgerows, sports pitches associated with the UCL Sports Ground, Arsenal Football Club and Watford Football Club training grounds, Salisbury Hall and The de Havilland Aircraft Museum in the northern part. The adjoining area-e is comprised of open agricultural fields, wooded plantations to the north and west, and Manor Lodge School to the north. As a result of their scale, strong openness, and the influence of surrounding topography, both areas have strong visual links

with the surrounding countryside to the south and south-west, with longer views across the wider countryside.



Photo 5.3 Facing east across open fields in Area-d, with views towards the de Havilland Aircraft Museum

Area-f contains the RSPCA Southridge Animal Centre to the north-west, but otherwise consists of open agricultural fields to the south and east. Although the area has built form and is within close physical proximity to the M25 to the north, it maintains a largely rural character overall. The dispersed trees throughout the site limit direct visual links to the motorway, and there are strong visual and perceptual links with the wider countryside to the south and east, as well as occasional (distant) views towards South Mimms.

5.1.5 Purpose 4

The proposed Redwell Garden Village does not abut an identified historic settlement core and does not meet this Purpose.

5.1.6 Assessment of Wider Impact

The proposed Redwell Garden Village (areas a-f) directly adjoins areas within the proposed Rabley Green Garden Village (areas g-i). Area-e directly adjoins area-h to the south, and area-i to the east. The potential release of area-e in combination with area-f is likely to impact the performance of area -i against Purpose 3, which would become almost completely enclosed by built form, creating a strong urbanising influence. Due to the enclosed nature of area-h, there are limited visual links with area-e to the north. The removal of area-e is therefore unlikely to substantially impact the performance of area-h against Purpose 3.

The proposed Redwell Garden Village also directly adjoins several sub-areas. Sub-areas 25 and 26 directly adjoin the south-east tip of area-c. If released in its entirety, area-c would impact the performance of SA-25 against Purpose 3, introducing new urbanising influences along its northern edge, and a sense of

enclosure as the sub-area becomes ‘sandwiched’ between built form to the north, the M25 to the south, and the washed over village of South Mimms to the east. While SA-25 and SA-26 would play a more critical role in maintaining physical and perceptual separation between settlements, in particular the proposed Redwell Garden Village, and South Mimms and Potters Bar, the scale of this separation would be minimal in terms of its physical scale. It is however noted that Redwell Wood does play a role in acting as a buffer between the proposed Redwell Garden Village and both South Mimms and Potters Bar, providing perceptual separation.

Due to the scale and openness of area-c, if removed from the Green Belt in its entirety this would harm the wider strategic Green Belt, reducing the physical and perceived distances between surrounding settlements and resulting in encroachment into a broad area of countryside. However, there may be an opportunity to limit harm to the wider Green Belt by restricting the extent of any Green Belt release.

While the southern half of area-c has an unspoilt rural feel and long views to wider countryside (although also with visual links onto built-up areas), the northern half of area-c is more suitable in Green Belt terms for further consideration for release. There is existing built form in the far north, which impacts on a wholly rural feel. Coursers Road and the M25 form durable and permanent boundaries to the north-west and south-west respectively, which would prevent further sprawl in these directions. These factors combined with the relative sense of containment due to local topography, which is lower lying compared to land to the south and east, and due to the dense wooded buffers along the eastern and north-eastern edge of the area, mean that if the north / north-east part of area-c was to be released in isolation, harm to the wider Green Belt could be ameliorated. Locating development within the dipped topography in the northern part of area-c would also help to limit visual impacts on the wider countryside (Purpose 3), while still maintaining separation between the proposed Redwell Garden Village and surrounding settlements (Purpose 2), including London Colney. Considered masterplanning could also limit the potential for visual links with the washed over village of South Mimms and Potters Bar by using the dense wooded areas of Walsingham Wood/Cobs Ash to the east of any development and Redwell Wood to the south of any development as natural screens between urbanising influences.

Although area-b is of a relatively small scale and is subject to urbanising influences due to the presence of existing adjacent development and additional development if the northern half of area-c is released, at a more strategic level it would play a particularly important role in maintaining physical separation between the proposed Redwell Garden Village and London Colney.

The potential release of area-a in isolation could result in adverse impacts on the wider Green Belt and is necessary to maintain both the physical and perceived separation between the proposed Redwell Garden Village and Colney Heath to the north (Purpose 2). There are limited natural features to help screen built form and reduce the urbanising impact on the surrounding open countryside (Purpose 3).

If area-a and area-b are released in combination, this would additionally reduce the scale of the gap between London Colney and Colney Heath and reduce the

perceived sense of separation between the settlements by introducing ribbon development along Coursers Road.

The release of areas -d, -e and -f, either in isolation or in combination, is likely to have an adverse impact on the wider strategic Green Belt. Due to their largely rural character, and strong links to the wider countryside, their combined release could encourage sprawl into a sensitive part of open countryside. Additionally, areas -d and -e play a particularly important role in maintaining separation between London Colney and Shenley to the south. Although Combe Wood to the south could help in screening visual links with Shenley, if these areas were to be released, this would fragment the overall integrity of the gap between these settlements, significantly reducing the physical scale of separation. The weak outer boundaries would not assist in regularising or restricting further development into the open countryside, or screen visual impacts on the wider Green Belt. Taking into consideration Recommended Area RS-4 (see section 6.4), if area-f were to be released in combination with this sub-area, this would harm the integrity of the gap between the proposed Garden Village, RS-4 if released and the washed over village of South Mimms to the east.

5.1.7 Recommendation

The proposed Redwell Garden Village, located to the east of London Colney, the south-east of Colney Heath, and the north of Shenley, meets the NPPF Purposes to a varying extent.

The proposed location for the Redwell Garden Village does not contribute to Purpose 1, as it is neither physically nor perceptually adjacent to a large built-up area, or Purpose 4, as it does not abut an identified historic settlement core. The north and south-westerly parts of the proposed Redwell Garden Village, (areas -a, -b, -d and -e, and the western part of area-c), make a significant contribution to Purpose 2. These areas prevent the merging of London Colney with Colney Heath to the north and Shenley to the south. The westernmost part of the proposed Redwell Garden Village, particularly to the north of the M25, would also maintain separation between the proposed Redwell Garden Village and London Colney and Colney Heath, maintaining a swathe of Green Belt between the settlements. While the site as a whole maintains a largely rural character, with a strong level of openness, the southern and south-eastern parts, (areas -d, -e and -f, and the far south-eastern part of area-c), are most important for preventing encroachment as a result of their unspoilt rural character and strong visual linkages to the wider countryside.

In terms of the wider Green Belt, if released in its entirety, the proposed Redwell Garden Village would adversely affect the performance of adjacent sub-areas, including areas-h and -i to the south and SA-25 and SA-26 to the east, as well as the wider Green Belt to the south due to the long views and functional connections between the proposed Redwell Garden Village and this area. This would also harm the wider strategic Green Belt, reducing the physical and perceived distances between surrounding settlements and resulting in encroachment into a broad area of countryside.

If a smaller part of area-c is released from the Green Belt in isolation, in particular the north/ north-east part of the area, there would be more limited harm to the wider Green Belt. The presence of strongly defined man-made features to the north-west (Coursers Road) and south-west (M25), combined with the relative sense of containment created by the site's topography and dense wooded buffers along the eastern and north-eastern edges of the area, mean that harm to the wider Green Belt could be restricted. Visual impacts on the wider countryside (Purpose 3) would be more limited, and the separation between the proposed Redwell Garden Village and surrounding settlements would be maintained (Purpose 2).

The area recommended for further consideration as a Garden Village, identified in Figure 5.2, is strongly bounded to the east and north-east by the edge of dense woodland, to the north by Coursers Road, partially to the south by a densely planted buffer, and partially to the south by a made private road. However, new durable, readily recognisable features would need to be created as part of any development along part of the south western edge and the north western edge of the recommended area. This is considered feasible given the scale of likely development.

5.2 Proposed Rabley Green Garden Village

The proposed Rabley Green Garden Village comprises land located to the north-east of Shenley and the west of South Mimms. For the purposes of this assessment, it has been divided into three areas, area-g, area-h and area-i, which are illustrated in Figure 5.1.

5.2.1 Description of Area and Boundaries

Due to the scale of the proposed Rabley Green Garden Village, its boundary features vary in terms of their strength and permanence. As none of the component areas adjoin a large built-up area, they do not have any inner boundaries. The outer boundaries of area-g are predominantly readily recognisable and likely to be permanent, comprising Mimms Lane to the south, an established treeline to the west, and Rectory Lane to the north. It is noted that the eastern boundary is weaker, with the northern part comprised of an intermittent hedgerow which likely lacks durability and permanence.

The outer boundaries of area-h are also predominantly readily recognisable and likely to be permanent, comprising Mimms Lane to the south, Rectory Lane and established wooded copses to the north, and Packhorse Lane to the east. The western boundary is shared with area-g, and as such, lacks durability and likely permanence.

The outer boundaries of area-i are readily recognisable and likely to be permanent, comprising Rectory Lane to the west and north, Blackhorse Lane to the north, Packhorse Lane to the east, established and consistent wooded copses and treelines to the south.

5.2.2 Purpose 1

The proposed Rabley Green Garden Village areas are not at the edge of a distinct large built-up area, in physical or perceptual terms, and therefore do not make a contribution to preventing sprawl.

5.2.3 Purpose 2

The three areas comprising the proposed Rabley Green Garden Village perform similarly in terms of maintaining gaps between settlements.

Areas-g and -h both form a less essential part of the gap between Shenley and Potters Bar, which are of sufficient scale and character that the settlements are unlikely to merge. Area-g is relatively small in scale when compared with the overall size of the gap, and while there are longer views across open countryside to the south due to the distance and topography of surrounding land, there is no intervisibility with nearby settlements. Area-h is similarly small in scale when compared with the overall size of the gap, and due to the presence of established planted buffers along the majority of its edges, and the lack of intervisibility with nearby settlements, it also plays a lesser role in maintaining perceptual separation between the settlements.



Photo 5.4 View of area-h facing east from north of site showing view of arable fields with an electricity pylon, enclosed by mature trees.

Area-i forms a less essential part of the gap between Shenley and Potters Bar, and London Colney and Potters Bar, which are of sufficient scale and character that the settlements are unlikely to merge. The area is relatively small in scale when compared with the overall size of the gap, and while there are some longer views across open countryside to the east, due to the distance and topography of surrounding land there is no intervisibility with nearby settlements (aside from some glimpses towards the washed over village of South Mimms from the northern part).

5.2.4 Purpose 3

Less than 5% of the proposed Rabley Green Garden Village is covered by built form. Less than 1% of area-g is covered by built-form, which is limited to residential properties and gardens in the far south-east. The remainder of the area comprises horse paddocks and open fields with dispersed trees throughout, separated by a thick line of trees which runs north-south through the centre of the area. The topography of the area rises to the north, affording longer views across the wider countryside to the south and south-east. Urbanising influences are limited to a cluster of residential properties, visible to the north-west of the area. Overall, the area has a strong unspoilt rural character.



Photo 5.5 View of area-g facing north from the south of the site showing view of horse paddocks and dispersed mature trees.

Approximately 3% of area-h is covered by built-form, which is dispersed throughout. It comprises a mixture of residential properties set in large gardens, as well as small farmsteads (which do not detract from the overall rurality of the area). These are interspersed with a network of small paddock and pastoral fields, many of which have a strong level of containment due to the presence of tree belts and dense hedgerow throughout the area, though there are some occasional glimpses towards the wider countryside to the south due to the topography of the surrounding countryside. Overall, the area has a largely rural character.

Less than 1% of area-i is covered by built form. The area is free of any built-form and comprises a mixture of arable and pastoral fields. The southern part of the area has a more contained feel due to substantial treelines and wooded copses along its southern, eastern and western edges, while the northern part has longer views to surrounding open countryside. The rurality of the area is diminished somewhat by some views towards the nearby M25 and occasional residential properties. Overall though, the area has a strong sense of openness, and maintains a strong unspoilt rural character.



Photo 5.6 View of area-i facing south from Rectory Lane showing view of pastoral fields surrounded by dispersed mature trees.

5.2.5 Purpose 4

The proposed Rabley Green Garden Village does not abut an identified historic settlement core and does not meet this Purpose.

5.2.6 Recommendation

The proposed Rabley Green Garden Village, located to the north-east of Shenley and west of South Mimms, meets the NPPF Purposes to a varying extent.

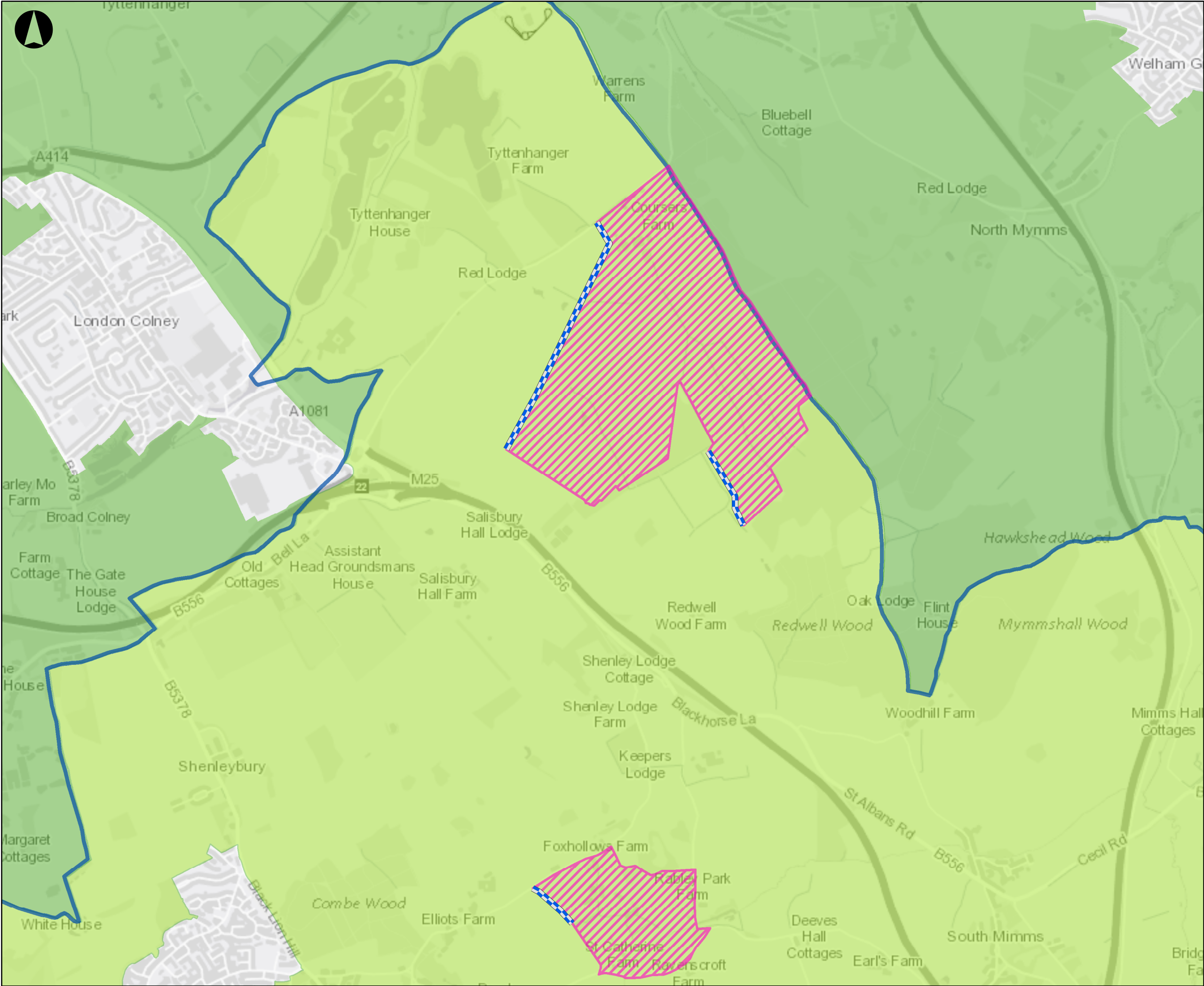
Area-g does not meet Purpose 1 or 4, and makes a limited contribution to Purpose 2, forming a less essential part of the gap between Shenley and Potters Bar. It does however make a strong contribution to Purpose 3, maintaining an unspoilt, rural character. Overall, due to the openness and unspoilt rural character of the area as well as its strong visual links with the wider Green Belt, if released it would likely result in harm to the performance of the wider strategic Green Belt.

Area-h does not meet Purpose 1 or 4, and makes a limited contribution to Purpose 2, forming a less essential part of the gap between Shenley and Potters Bar. The area makes a moderate contribution to Purpose 3, preventing encroachment into an area with a largely rural character. While the area plays some role locally in preventing encroachment into the countryside, it plays a less fundamental role than the wider Green Belt Parcel. Overall, it is considered that its release is unlikely to harm the performance of the wider Strategic Green Belt.


Area-i does not meet Purpose 1 or 4, and makes a limited contribution to Purpose 2, forming a less essential part of the gap between Shenley and Potters Bar, and London Colney and Potters Bar, which are of sufficient scale and character that the settlements are unlikely to merge. It does however make a strong contribution to Purpose 3, maintaining an unspoilt, rural character. As such, its removal would

reduce the performance of the surrounding Green Belt against Purpose 3, particularly to the east due to the strong intervisibility between these areas. If area-i was released together with area-h to the south, cumulatively there would be a sizeable reduction in the overall scale and openness of the gaps between Shenley and Potters Bar, and London Colney and Potters Bar, as well as between London Colney and the washed over settlement of South Mimms (Purpose 2). Furthermore, it would diminish the unspoilt, rural character of a much wider swathe of Green Belt (Purpose 3). Overall, due to its strong visual links with the wider Green Belt, if released it would likely result in harm to the performance of the wider strategic Green Belt.

Although the Rabley Green Garden Village proposal includes area-g, area-h and area-i as a collective consideration, it is recommended that area-h could be considered further in isolation. Its potential release would result in the establishment of a new Green Belt boundary around a new settlement. It is however recognised that area-h itself may be of insufficient scale to be suitable for a new garden village. It is noted that the west boundary would require strengthening to ensure it is readily recognisable and likely to be permanent.

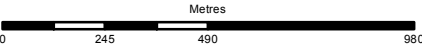


Legend

-  Hertsmere Borough Boundary
-  Hertsmere Green Belt
-  Neighbouring Green Belt
-  Recommended Area for Further Consideration of Garden Village
-  Substantial Boundary Mitigation Required

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P1	16-10-18	ER	ML	KF
Issue	Date	By	Chkd	Appd



ARUP

Client
Hertsmere Borough Council

Job Title
Hertsmere Green Belt Assessment
(Stage 2)

Figure 5.2: Recommended
Garden Village Area

Scale at A3
1:18,000

Job No 261001-00	Drawing Status Issued	Issue P1
Drawing No 5.2		

6 Recommendations

6.1 Overview

This section sets out a series of recommendations which the Council should consider in the review of the Hertsmere Local Plan. These draw on the assessment against the NPPF Purposes (Step 4A), the harm to the wider strategic Green Belt (Step 4B), and consideration of boundaries (Step 4C), together with the sub-area categorisation (Step 5). 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 arguments relating to the performance of smaller areas of Green Belt.

Drawing on both the GBA and GBA Stage 2, it is clear that the majority of the Green Belt in Hertsmere is performing an important role in terms of the NPPF Purposes, at both the strategic level and on a smaller scale.

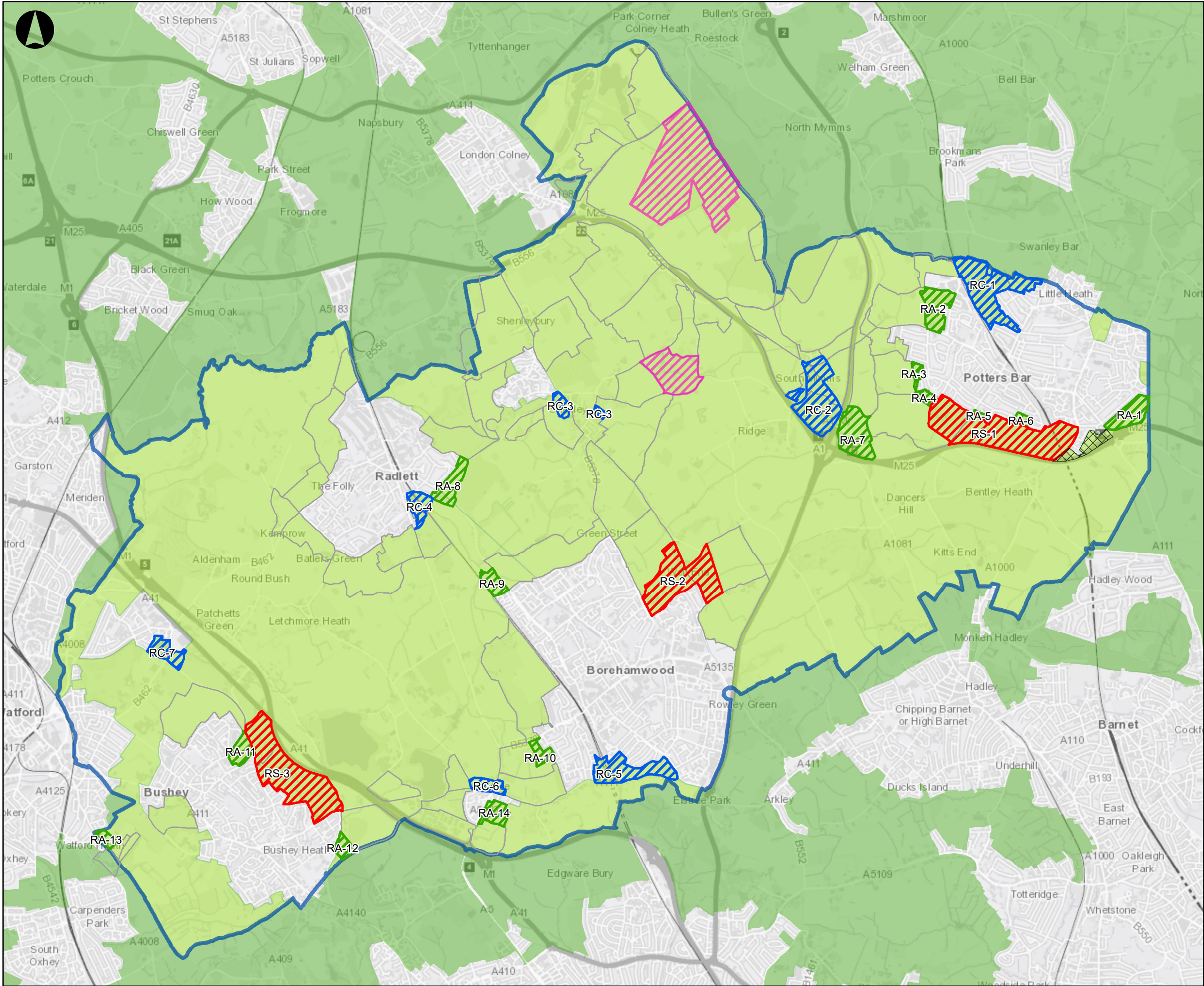
Aside from excluding sub-areas which are wholly or predominantly affected by absolute constraints prior to commencing the assessment, it should also be noted that all sub-areas have been categorised for further consideration based on their performance against NPPF purposes only, at a sub-area and wider strategic level. Suitability in terms of sustainability, deliverability, infrastructure and wider planning considerations has not been taken into account.

The sub-areas categorised for further consideration (at Step 5) are illustrated in Table 4.6 and Figure 4.6. Settlement level maps can be found in Appendix H.

Sub-areas categorised for further consideration have been recommended, either wholly or partially, on the basis of one of the following:

- Recommended for further consideration in isolation ('RA's) – if removed from the Green Belt, these areas are unlikely to result in harm to the wider Green Belt;
- Recommended for further consideration in combination ('RC's) - if removed from the Green Belt in combination, these areas are unlikely to result in harm to the wider Green Belt, but the constituent sub-areas could not be removed in isolation without resulting in harm;
- Recommended for further consideration as a strategic cluster ('RS's) – larger swathes of Green Belt for consideration by the Council which would be least harmful to the wider Green Belt if removed, and where there are opportunities to ameliorate harm.

Each recommended sub-area, combination of sub-areas or strategic cluster has been assigned a unique reference number, illustrated in Figure 6.1. Settlement scale maps can be found in Appendix I. For completeness, these maps also illustrate those whole Parcels recommended for further consideration in the GBA, as well as the recommended area for further consideration of the Garden Village (see section 5).

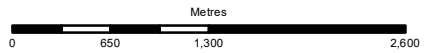


Legend

- Sub-Areas Not Recommended for Further Considerations
- Hertsmere Borough Boundary
- Hertsmere Green Belt
- Neighbouring Green Belt
- Recommended as Strategic Cluster
- Recommended in Combination
- Recommended in Isolation
- Recommended Area for Further Consideration of Garden Village
- Weakly performing parcels (GBA)

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Issue	Date	By	Chkd	Appd



ARUP

Client
Hertsmere Borough Council

Job Title
Hertsmere Green Belt Assessment
(Stage 2)

Figure 6.1: Recommended Areas,
Garden Village Area and Parcels (GBA)

Scale at A3
1:50,000

Job No 261001-00	Drawing Status Issued
Drawing No 6.1	Issue P1

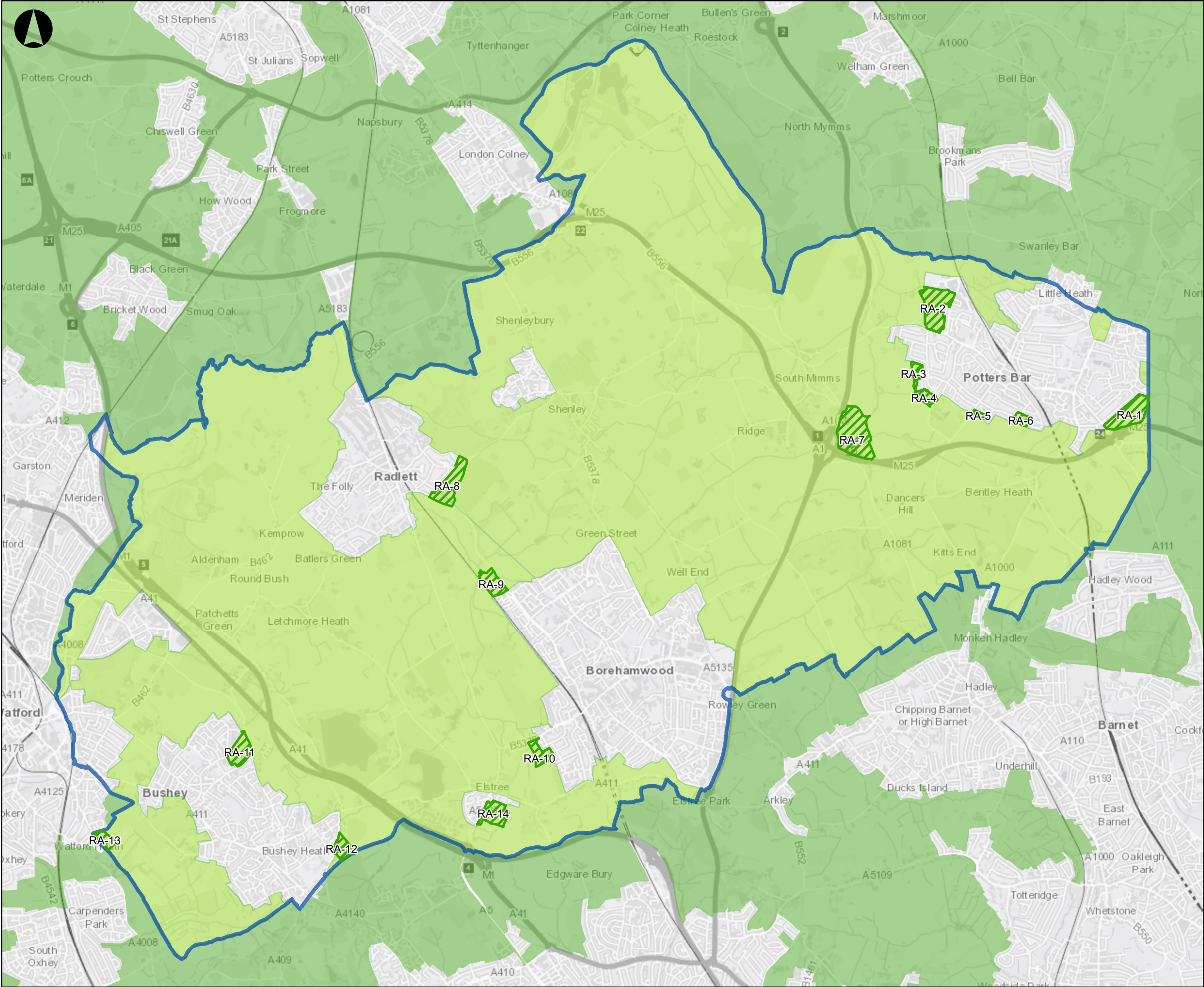
6.2 Sub-areas Recommended in Isolation

Fourteen sub-areas have been recommended in isolation. These are illustrated spatially in Figure 6.2.





RA-1 (SA-1) – South-east of Park Avenue, Potters Bar



Step 4A (NPPF Assessment): SA-1, located to the south-east of Potters Bar, meets the purposes moderately overall. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs weakly against Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area performs moderately against Purpose 3 as a result of its largely rural character and lack of built form. The sub-area does not meet Purpose 4.

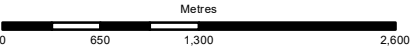


Legend

-  Recommended in Isolation
-  Hertsmere Boundary
-  Hertsmere Green Belt
-  Neighbouring Green Belt

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P1	10-10-18	IN	ML	KF
Issue	Date	By	Chkd	Appd



ARUP

Client
Hertsmere Borough Council

Job Title
Hertsmere Green Belt Assessment
(Stage 2)

Figure 6.2:
Areas Recommended
in Isolation

Scale at A3
1:50,000

Job No 261001-00	Drawing Status Issue
Drawing No 6.2	Issue P1

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (41). Due to its location directly adjoining Potters Bar to the north and the M25 to the south and limited visual links or connection with the wider countryside, the removal of the sub-area is unlikely to impact the wider Green Belt. Its isolation from adjoining sub-areas limits its ability to impact the performance of the surrounding Green Belt.

Step 4C (Consideration of Boundaries): Both the inner and outer boundaries of the sub-area are readily recognisable and likely to be permanent, and the release of the sub-area would result in the designation of a Green Belt boundary of similar strength as the existing boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria moderately but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-1 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 Green Belt boundary of a similar strength when compared with the existing boundary. It is recommended that sub-area 1 is considered further for release as RA-1.

RA-2 (SA-7) – West of Cranborne Road, Potters Bar



Step 4A (NPPF Assessment): SA-7, located to the west of Potters Bar, meets the purposes weakly overall. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs weakly against Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area performs weakly against Purpose 3, as a result of the extensive built form and strong visual links to Potters Bar. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (46). SA-7 directly adjoins SA-6 to the west. Although the Furze field Leisure Centre already acts an urbanising influence on the adjoining sub-area, its release could result in a greater sense of enclosure. However due to its relatively small scale, strong sense of enclosure and limited visual and perceptual links with the wider countryside, the removal of the sub-area is unlikely to impact the performance of the surrounding Green Belt.

Step 4C (Consideration of Boundaries): The inner boundaries of the sub-area are readily recognisable and likely to be permanent, however it is noted that the outer boundary is formed of softer features, comprising a dispersed treeline and edge of

woodland to the west. The release of the sub-area would result in the designation of a weaker Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-7 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 weaker Green Belt boundary, when compared with the existing boundary and would require strengthening to the west. It is recommended that sub-area 7 is considered further for release as RA-2.

RA-3 (SA-10) – North of Bridgefoot Lane, Potters Bar



Step 4A (NPPF Assessment): SA-10, located to the west of Potters Bar, meets the purposes weakly overall. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and makes no discernible contribution to the separation of settlements and does not meet Purpose 2. The sub-area performs

weakly against Purpose 3 due to its strong sense of enclosure, limited links with the wider countryside and managed feel from the allotments to the north. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (35). Due to the dense woodland covering the majority of the sub-area, there are limited physical or perceptual links with adjoining SA-9, and its removal is unlikely to impact the performance of the wider Green Belt.

Step 4C (Consideration of Boundaries): Both the inner and outer boundaries of the sub-area are readily recognisable and likely to be permanent, however it is noted that the inner boundaries forms of backs of residential properties and gardens are not uniform. The release of the sub-area would result in the designation of a similarly performing Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria weakly, and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-10 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 10 is considered further for release as RA-3.

RA-4 (SA-11) – West of Dugdale Hill Lane, Potters Bar



Step 4A (NPPF Assessment): SA-11, located to the south-west of Potters Bar, meets the purposes moderately overall. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and makes no discernible contribution to the separation of settlements and does not meet Purpose 2. The sub-area performs moderately against Purpose 3, as a result the general absence of built-form and predominantly rural land uses. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (35). SA-11 directly adjoins a number of sub-areas, including SA-9 to the north-west, SA-12 to the south-west, and SA-13 to the south-east. As a result of the thick, mature treeline boundaries to the south and west, and mature hedgerow adjoining Dugdale Hill Lane to the west, the sub-area has a strong sense of visual containment, with limited visual and perceptual links with the wider countryside. The removal of the sub-area is therefore unlikely to impact the performance of the surrounding Green Belt.

Step 4C (Consideration of Boundaries): Both the inner and outer boundaries of the sub-area are readily recognisable and likely to be permanent, and the release of the sub-area would result in the designation of a stronger Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria moderately but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-11 performs moderately against NPPF purposes and plays a limited role in respect to the wider strategic Green Belt. It is noted that the release of the sub-area would result in the designation of a Green Belt boundary of increased strength or permanence when compared with the existing boundary. It is recommended that sub-area 11 is considered further for release as RA-4.

RA-5 (SA-14) – East of Baker Street, Potters Bar (Pope Paul Catholic School site)



Step 4A (NPPF Assessment): SA-14, located to the south of Potters Bar, performs weakly overall. The sub-area does not meet Purpose 1 as it is not at the edge of a

distinct large built-up area, and makes no discernible contribution to the separation of settlements and does not meet Purpose 2. The sub-area does not meet Purpose 3, as a result of its extensive built form, sense of physical containment and urban character. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (35). SA-14 directly adjoins SA-15 to the south. Although the Pope Paul Catholic Primary School already acts an urbanising influence on the adjoining sub-area, its release could result in a greater sense of enclosure for the western part of SA-15. Due to its small scale, and strong sense of physical and visual enclosure, the removal of the sub-area is unlikely to impact the performance of the surrounding Green Belt.

Step 4C (Consideration of Boundaries): The inner boundaries of the sub-area are readily recognisable and likely to be permanent, however it is noted that the outer boundary is formed of softer features, comprising a low-lying intermittent hedgerow to the south. The release of the sub-area would result in the designation of a weaker Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-14 performs weakly against NPPF purposes and plays a limited role in respect to the wider strategic Green Belt. It is noted that the release of the sub-area would result in the designation of a weaker Green Belt boundary when compared with the existing boundary and would require strengthening along the southern boundary. It is recommended that sub-area 14 is considered further for release as RA-5.

RA-6 (SA-16) – South of Field View Road, Potters Bar (former Sunnybank School Site)



Step 4A (NPPF Assessment): SA-16, located to the south of Potters Bar, performs weakly overall. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and does not meet Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area does not meet Purpose 3, as a result of its extensive built form, strong sense of enclosure and urban character. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (35). SA-16 directly adjoins SA-15 to the south. The existence of the Park Education Support Centre on raised topography already acts as an urbanising influence on the adjoining sub-area, however southern mature hedgerow boundary, and rising topography to the south restricts visual and perceptual links with the surrounding countryside. The removal of the sub-area is therefore unlikely to impact the performance of the surrounding Green Belt.

Step 4C (Consideration of Boundaries): The inner boundaries of the sub-area are readily recognisable and likely to be permanent, however it is noted that the outer boundary is formed of softer features, comprising a mature hedgerow. The release of the sub-area would result in the designation of a weaker Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

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

RA-7 (SA-18) – North-east of M25 J23, South Mimms



Step 4A (NPPF Assessment): SA-18, located to the south-east of South Mimms and to the south-west of Potters Bar, performs weakly overall. The sub-area does

not meet Purpose 1 as it is not at the edge of a distinct large built-up area makes no discernible contribution to the separation of settlements and does not meet Purpose 2. The sub-area does not meet Purpose 3, as a result of its extensive built form, sense of physical containment and urban character. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (36). SA-18 directly adjoins SA-17 to the north and SA-12 to the east. As a result of the extensive existing built form, and strong sense of enclosure from the surrounding M25, A1(M) and mature treelines, the removal of the sub-area is unlikely to impact the performance of the surrounding Green Belt. It is however noted that its release could strengthen the role of SA-22 and SA-21 in maintaining physical and perceptual distance with the washed over villages of South Mimms and Ridge.

Step 4C (Consideration of Boundaries): The sub-area does not have any inner boundaries as it does not adjoin a large built-up area, however the outer boundaries are readily recognisable and likely to be permanent. The release of the sub-area would result in the designation of a new Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-18 performs weakly against NPPF purposes and plays a limited role in respect to the wider strategic Green Belt. It is noted that the release of the sub-area would result in the designation of a new Green Belt boundary around an area of development, formed of readily recognisable and durable features. It is recommended that sub-area 18 is considered further for release as RA-7.

RA-8 (SA-75) – South of Shenley Road, Radlett



Step 4A (NPPF Assessment): SA-75, located to the east of Radlett, performs moderately overall. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs moderately against Purpose 2, forming a small part of the gap between Radlett and Borehamwood, and preventing ribbon development from Radlett. It is also noted that the Gorse Woodland to the south-east of the sub-area provides an additional buffer to the physical or perceptual coalescence of settlements. The sub-area performs moderately against Purpose 3, as it is formed of open fields with limited built form, contributing to a largely rural character. It is however noted that the sub-area has a strong sense of enclosure, with limited links to the wider countryside. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (30). SA-75 directly adjoins a small part of SA-35 to the north-east, and the corner of SA-40 to the south-west. As a result of the mature tree belts to the north-east and south-west, SA-75 has limited physical and visual links with surrounding sub-areas. The sub-area itself is visually enclosed with strong links to the settlements edge, and its removal is unlikely to

impact the performance of surrounding sub-areas, particularly as SA-35 has a semi-urban character due to the managed feel of the Porters Park Golf Club. As a result of its scale and location between the settlement edge and Gorse Woodland, with limited connection with the wider countryside, the removal of the sub-area is unlikely to impact the performance of the wider strategic Green Belt.

Step 4C (Consideration of Boundaries): Both the inner and outer boundaries of the sub-area are readily recognisable and likely to be permanent. The release of the sub-area would result in the designation of a similarly performing Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria moderately but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-75 performs moderately against NPPF purposes and plays a limited role in respect to 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 75 is considered further for release as RA-8.

RA-9 (SA-43) – West of Theobald Street, Borehamwood



Step 4A (NPPF Assessment): SA-43, located to the north of Borehamwood, meets the Purposes moderately overall. The sub-area performs moderately against Purpose 1, preventing the outward sprawl of Borehamwood and moderately against Purpose 2, forming a wider part of the gap between Borehamwood and Radlett. The sub-area also performs moderately against Purpose 3, comprising both open agricultural fields and existing built-form. It is noted that the railway to the west, and visual connections to residential properties to the south, contribute to a sense of enclosure, and limit the connection with the wider countryside. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role than the wider Green Belt Parcel, performing less strongly against Purposes 2 and 3. As a result of its small scale, limited visual links to the surrounding Green Belt, and the presence of existing ribbon development along Theobald Street, if the sub-area were to be removed from the Green Belt it would not reduce the performance of the surrounding Green Belt against the NPPF Purposes, or harm the integrity of the wider strategic Green Belt.

Step 4C (Consideration of Boundaries): The inner Green Belt boundary is readily recognisable and likely to be permanent, comprising the well-defined, rectilinear backs of residential properties on Stainer Road and Farm Close to the south. The outer boundary to east and west is formed of predominantly strong features, however the boundary to the north is weaker, comprising a very small watercourse reinforced with a thin line of mature trees, and the weakly-defined edge of a residential garden. If the sub-area were to be released this would result in the designation of a weaker Green Belt boundary than the existing inner Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria moderately but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-43 performs moderately against the NPPF purposes but plays a limited role in respect of the wider strategic Green Belt and could therefore be considered further. It is noted that the release of the sub-area would result in the designation of weaker Green Belt boundary. While the western and eastern boundaries are considered to be adequately recognisable and likely to be permanent, the northern boundary (formed of a very small watercourse reinforced with a thin line of mature trees, and the weakly-defined edge of a residential garden) would require strengthening to ensure it is readily recognisable and likely to permanent.

SA-43 should be considered further for release as RA-9.

RA-10 (Part of SA-52) – South of Allum Lane, Borehamwood



Step 4A (NPPF Assessment): SA-52, located to the west of Borehamwood and the north-east of Elstree, meets the purposes strongly overall. The sub-area performs moderately against Purpose 1, preventing the outward sprawl of Borehamwood, strongly against Purpose 2, forming the essential gap between Borehamwood and Elstree, and weakly against Purpose 3 as a result of its semi-urban character and strong visual connections with adjoining development. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a similarly important role as the wider Green Belt Parcel. If removed in its entirety, this would result in the merging of Elstree with Borehamwood. However, a small area in the north-east of SA-52, set between the edge of Borehamwood and the Household Waste Centre, plays a lesser role in preventing coalescence due its small scale, limited visual/physical connections to the wider countryside, and its more limited role in maintaining the overall openness and scale of the gap between Elstree and Borehamwood (due to the presence of existing development to the west, north and east).

Step 4C (Consideration of Boundaries): The outer boundaries of the sub-area are predominantly strong features, and the sub-area would result in stronger boundaries than the existing inner Green Belt boundary, which comprises the well-defined, rectilinear back of residential properties on Knowl Way and Bishops Avenue. There are a number of additional readily recognisable features that are likely to be permanent, which could be used to further sub-divide the sub-area, including the access road to Elstree Cemetery, a dense planted buffer along the eastern edge of Elstree Household Waste Recycling Centre, and various tree belts / hedgerows (some of which would require further reinforcement to ensure the Green Belt boundary is readily recognisable and likely to be permanent).

Step 5 (Categorisation): Meets Purpose assessment criteria strongly, but the north-eastern part makes a less important contribution to the wider strategic Green Belt. North-eastern part is recommended for further consideration.

Step 6 (Recommendation): SA-52 performs strongly against the NPPF Purposes and, in its entirety, plays an important role in the wider strategic Green Belt. The north-eastern part plays a lesser role due the configuration of surrounding development, its small scale, limited visual/physical connections to the wider countryside, and its more limited role in maintaining the overall openness and scale of the gap between Elstree and Borehamwood. It could therefore be considered further in isolation.

It is noted that the release of the north-eastern part of the sub-area would result in the designation of a weaker Green Belt boundary. While the western and northern boundaries are considered to be adequately recognisable and likely to be permanent, the southern boundary (formed of an intermittent tree belt / hedgerow) would require strengthening to ensure it is readily recognisable and likely to be permanent, and to restrict visual links to the wider Green Belt to the south.

The north-eastern part of SA-52 should be considered further for release as RA-10.

RA-11 (SA-55) – Little Bushey Lane/ Coldharbour Lane, Bushey (Bushey Meads School site)



Step 4A (NPPF Assessment): SA-55, located to the north-east of Bushey Heath, performs weakly overall. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs weakly against Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The M1 to the east of the sub-area is considered to provide an additional boundary which would prevent the perceptual coalescence of settlements. The sub-area does not meet Purpose 3, as a result of the extensive built form and strong visual connections to Potters Bar, contributing to an urban character. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (6). SA-55 directly adjoins SA-54 to the north-east. Due to the mature hedgerow along Little Bushey Lane, the removal of the sub-area is unlikely to impact the performance of SA-54 against Purpose, as any urbanising influences would be screened. As a result of its scale and location surrounded by built form, and limited connection with the wider countryside, the

removal of the sub-area is unlikely to impact the performance of the wider Green Belt.

Step 4C (Consideration of Boundaries): The inner boundaries of the sub-area are relatively weak, formed of features that are not readily recognisable and lack permanence. The outer boundaries are readily recognisable and likely to be permanent. The release of the sub-area would result in the designation of a stronger Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-55 performs weakly against NPPF purposes and plays a limited role in respect to the wider strategic Green Belt. It is noted that the release of the sub-area would result in the designation of a stronger Green Belt boundary when compared with the existing boundary. It is recommended that sub-area 55 is considered further for release as RA-11.

RA-12 (SA-58) – East of Heathbourne Road, Bushey Heath



Step 4A (NPPF Assessment): SA-58, located to the east of Bushey Heath, performs weakly overall. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs weakly against Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area performs weakly against Purpose 3, as a result of existing built form and strong sense of enclosure, contributing to a semi-urban character. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a less important role when compared against the wider Parcel (2). SA-58 directly adjoins SA-56 to the north-east. The mature treeline boundary adjoining Bramble Wood, although dispersed, limits visual links to the north-east into the adjoining sub-area. As a result of the dense woodland to the south, and to the north-east within SA-56, the sub-area has a strong sense of visual containment, and its release is unlikely to impact the performance of the wider strategic Green Belt.

Step 4C (Consideration of Boundaries): The inner boundary of the sub-area is readily recognisable and likely to be permanent, however it is noted that the outer boundaries are formed of less recognisable, weaker features, comprising the edge of a woodland, backs of residential properties and gardens and an access road. The release of the sub-area would result in the designation of a weaker Green Belt boundary.

Step 5 (Categorisation): Meets Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-58 performs weakly against NPPF purposes and plays a limited role in respect to the wider strategic Green Belt. It is noted that the release of the sub-area would result in the designation of a weaker boundary when compared with the existing boundary and would require strengthening. It is recommended that sub-area 58 is considered further for release.

RA-13 (Part of SA-71) – South-east of Bucks Avenue, West of Bushey



Step 4A (NPPF Assessment): SA-71, located to the south of Watford, meets the purposes strongly overall. The sub-area performs strongly against Purpose 1, preventing the outward sprawl of Watford in the absence of outer boundaries to restrict the scale of growth or assist in regularising development form. It also performs moderately against Purposes 2 and 3, forming a wider part of the gap between Watford and South Oxhey, and preventing encroachment into an area with a largely rural character. It does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-area plays a similarly important role as the wider Green Belt Parcel, particularly in relation to restricting sprawl (Purpose 1) and preventing encroachment into the countryside (Purpose 3). If the sub-area was removed from the Green Belt in its entirety, this would result in encroachment into a wider area of Green Belt (Purpose 3) due its strong visual linkage with the wider Green Belt to the south-east, and would further fragment the narrow gap between Watford and South Oxhey, which is already perceptually reduced in scale by the presence of ribbon development along Oxhey Lane. However, due to its relative visual containment, existing levels of encroachment

(including construction work to the north-west) and strong links to the edge of Watford, the northern part of the sub-area does not play a fundamental role in relation to the wider Green Belt Parcel, and if released in isolation would not harm the performance of the wider strategic Green Belt.

Step 4C (Consideration of Boundaries): The inner boundary of the sub-area is partly formed of features that are readily recognisable and likely to be permanent, but the outer boundary to the north-eastern and south-eastern boundary is weaker and less likely to be permanent, consisting of an intermittent hedgerow / tree belt.

There are additional readily recognisable features which could be used to further sub-divide the sub-area, including an intermittent tree belt/hedgerow (running north-eastwards from the backs of properties on Elm Avenue), and the backs of residential properties and gardens at the edge of new residential development within the sub-area. Both features would possibly require further reinforcement to ensure the Green Belt boundary is readily recognisable and likely to be permanent.

Step 5 (Categorisation): Meets Purpose assessment criteria strongly, but the northern part makes a less important contribution to the wider strategic Green Belt. Northern part is recommended for further consideration.

Step 6 (Recommendation): SA-71 performs strongly against the NPPF Purposes and, in its entirety, plays an important role in the wider strategic Green Belt. The northern part of the sub-area does not play a fundamental role in relation to the wider Green Belt due to its relative visual containment, existing levels of encroachment and strong links to the edge of Watford, and therefore should be considered further in isolation.

It is noted that the partial release of the sub-area would result in the designation of a weaker Green Belt boundary, which would require significant strengthening to the north-east and south.

The northern part of SA-71 should be considered further for release as RA-13.

RA-14 (Part of SA-65) – South-east of Elstree Village



Step 4A (NPPF Assessment): SA-65, located to the south-east of Elstree, meets the purposes moderately overall. The sub-area performs weakly against Purpose 2, forming a less essential part of the overall gap between Elstree and Greater London (Edgware), and moderately against Purpose 3, preventing encroachment into an area with a largely rural character and strong visual connections to the wider countryside. It does not meet Purposes 1 or 4. It should be noted that the northern part plays a lesser role in preventing encroachment into the countryside as a result of existing encroachment here and strong intervisibility with the edge of Elstree.

Step 4B (Strategic Assessment): The sub-area plays a less important role than the wider Green Belt Parcel, performing less strongly against Purposes 1, 2 and 3. However, if the sub-area were to be removed from the Green Belt in its entirety, this may result in harm to the wider Green Belt Parcel 3 as a result of the strong functional and visual links between these areas, resulting in encroachment into the countryside and reducing the rurality of an area of Green Belt already impacted by piecemeal developments. In contrast, due to its visual containment, existing levels of encroachment and strong links to the edge of Elstree, the northern part of the

sub-area does not play a fundamental role in relation to the wider Green Belt Parcel, and if released in isolation it would not harm the performance of the wider strategic Green Belt.

Step 4C (Consideration of Boundaries): The inner boundaries of the sub-area are readily recognisable and likely to be permanent. The outer boundary of the sub-area is largely formed of features that are readily recognisable and likely to be permanent, but the south-eastern boundary is weaker and less likely to be permanent, consisting of an intermittent hedgerow / tree belt, which furthermore does not restrict longer views to the wider Green Belt beyond.

There are additional readily recognisable features which could be used to further sub-divide the sub-area, specifically a dense, well-established belt of trees and hedgerow separating the northern and southern parts of the sub-area.

Step 5 (Categorisation): Meets Purpose assessment criteria moderately, but the northern part makes a less important contribution to the wider strategic Green Belt. Northern part is recommended for further consideration.

Step 6 (Recommendation): SA-65 performs moderately against the NPPF Purposes and, in its entirety, plays an important role in the wider strategic Green Belt. The northern part of the sub-area does not play a fundamental role in relation to the wider Green Belt due to its greater sense of containment and more limited visual links to the wider countryside, and therefore should be considered further in isolation.

It is noted that the partial release of the sub-area would result in the designation of a weaker Green Belt boundary. However, these boundaries are considered to be adequately recognisable and likely to be permanent (noting the opportunity to further strengthen the southern boundary to restrict visual links with the wider Green Belt to the south).

The northern part of SA-65 should be considered further for release as RA-14.

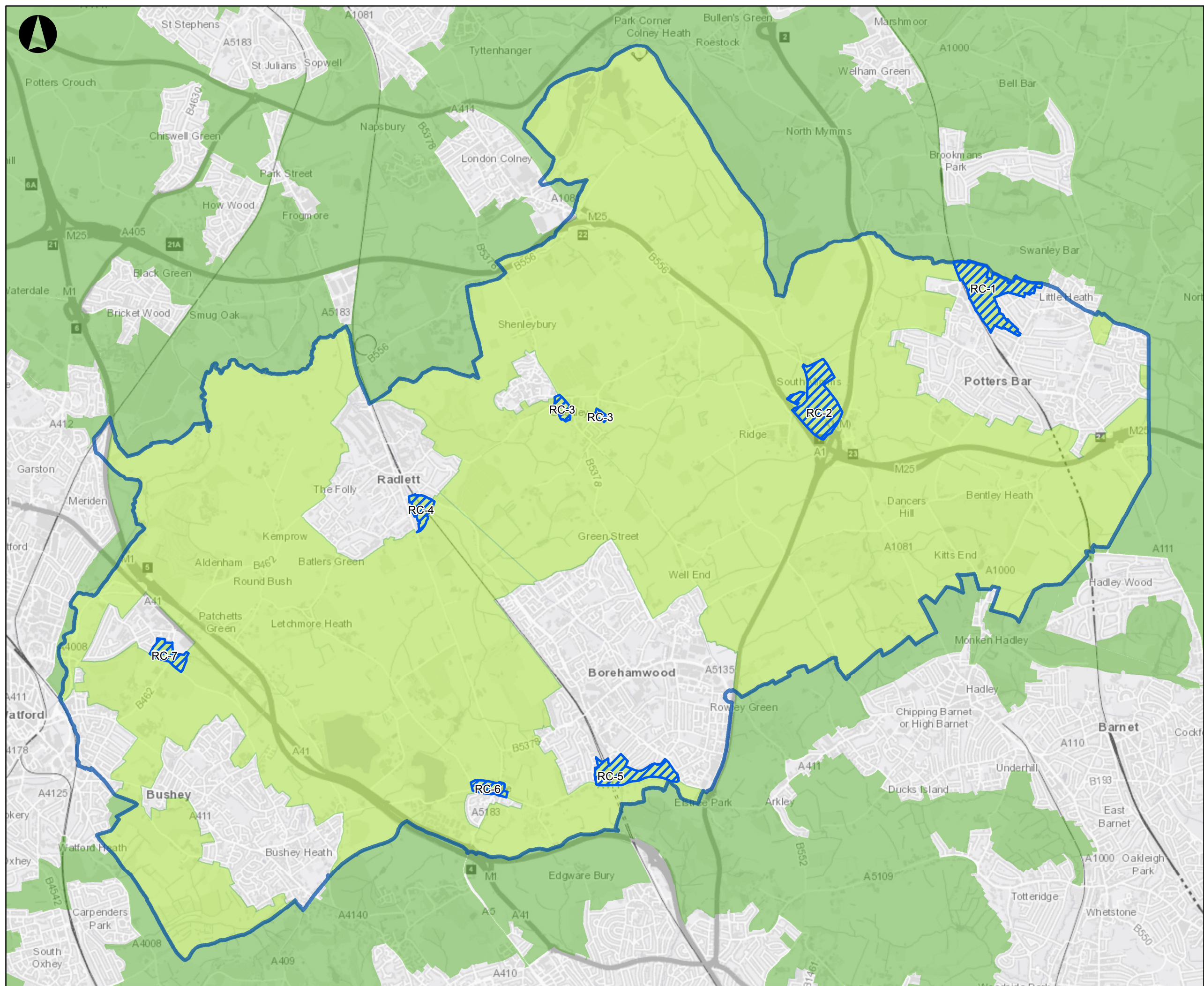
6.3 Sub-areas Recommended in Combination

Seven areas, encompassing 17 sub-areas, have been recommended in combination. These are illustrated spatially in Figure 6.3.





RC-1 (SA-3 and SA-4) – North of Potters Bar



Step 4A (NPPF Assessment): SA-3 and SA-4, located to the north of Potters Bar, perform moderately overall. For SA-3, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, however performs moderately against Purpose 2, forming a wider part of the wider gap between Potter's Bar and Brookmans Park, maintaining the overall openness and scale of the gap. The sub-area performs weakly against Purpose 3, as a result of the managed feel of the golf course and strong sense of enclosure, contributing to a semi-urban character. It is noted that the south-western part of the sub-area is visually separated from the golf course, comprising a low-grade field. The combination of woodland to the north-east and residential properties to the south-west contribute to a strong sense of enclosure in this area. The sub-area does not meet Purpose 4.

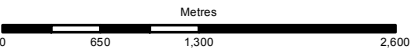


Legend

-  Recommended in Combination
-  Hertsmere Boundary
-  Hertsmere Green Belt
-  Neighbouring Green Belt

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P0	16-10-18	IN	ML	KF
Issue	Date	By	Chkd	Appd



ARUP

Client
Hertsmere Borough Council

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

Figure 6.3:
Areas recommended in
Combination

Scale at A3
1:50,000

Job No 261001-00	Drawing Status Issue
Drawing No 6.3	Issue No P0

For SA-4, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs weakly against Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area performs moderately against Purpose 3, as a result of the limited built form, and strong visual links with the wider countryside, contributing to a largely rural character. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-areas play a less important role when compared against the wider Parcel (47). Their isolation from adjoining sub-area, and strong sense of physical enclosure from the built form of Potters Bar, limits the impact on the surrounding Green Belt.

Step 4C (Consideration of Boundaries): For SA-3, the inner boundaries are readily recognisable and likely to be permanent, however the outer boundaries are formed of softer features such as a mature hedgerow and small river tributary. For SA-4, both the inner and outer boundaries are formed of less defined, weaker features. Their combined release would result in the designation of a weaker Green Belt boundary.

Step 5 (Categorisation): SA-3 and SA-4 meet the Purposes assessment criteria moderately but make a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): Both SA-3 and SA-4 perform moderately against NPPF purposes and play a limited role in respect to the wider strategic Green Belt. It is noted that their combined release would result in the designation of a weaker Green Belt boundary and would require strengthening to the north.

It is recommended that SA-3 and SA-4 are considered further in combination for release as RC-1.

RC-2 (SA-21, SA-22, SA-23 and parts of SA-19 and SA-20) – North-west of M25 J23, South Mimms



Step 4A (NPPF Assessment): SA-22, SA-21, SA-20, SA-19 and SA-23 are located to the south, east, and west of the ‘washed over’ village of South Mimms (respectively). SA-19, SA-20 and SA-23 meet the Purposes moderately overall, whilst SA-21 and SA-22 perform weakly overall.

None of the sub-areas meet Purpose 1 as they are not located at the edge of a distinct large built-up area, and do not meet Purpose 2, making no discernible contribution to separation of settlements. SA-19, SA-20 and SA-23 perform moderately against Purpose 3, predominantly comprised of arable fields and horse paddocks, with visual links to the wider countryside, contributing to a largely rural character. However, the southwestern part of SA-19 has a semi-urban character. SA-21 and SA-22 perform weakly against Purpose 3, due to the extensive built form, presence of urbanising influences and strong sense of containment contributing to a semi-urban character. None of the sub-areas meet Purpose 4.

Step 4B (Strategic Assessment): SA-19, SA-20, SA-21, SA-22 and SA-23 are all located in the wider Parcel 40 and meet the Green Belt purposes to a similar extent when compared to the overall performance of the Parcel, although the north-western part of SA-20 is identified as not playing a fundamental role with the respect to the wider parcel. Parcel 40 was identified as performing weakly against Purposes 1 and 2 as it is not at the edge of a distinct large built-up area, and forms a less essential gap between Potters Bar, Shenley, Borehamwood and Greater London (Chipping Barnet/ High Barnet), which is of sufficient scale and character that development is unlikely to cause merging between settlements. The Parcel performs moderately against Purpose 3 due to the presence of piecemeal development and the urbanising influences of the M25 and A1 Motorway. The sub-areas perform similarly against the Purposes however, it is noted that SA-21 and SA-22 perform a weaker role against Purpose 3 as a result of their semi-urban character.

Due to the washed over nature of South Mimms, the release of these sub-areas in isolation or in combination with surrounding sub-areas would result in a 'hole' in the Green Belt. If, however, it is considered appropriate to inset South Mimms, then further consideration could be made.

Assuming SA-21, SA-22, the south-western arm of SA-19 and the north-western corner of SA-20 would be considered in combination, their release is unlikely to alter the performance of the wider Green Belt. SA-20 and SA-21 have already experienced encroachment and have a strong sense of visual containment due to the extensive woodland and built form. The A1(M) to the east and south provides a durable boundary feature which would limit physical and visual links to the wider countryside and maintain separation with Potters Bar to the east. Similarly, SA-22 has also experienced extensive encroachment in the northern part of the sub-area and maintains a semi-urban character. The combination of the built form and woodland to the west, along with the presence of M25 to the west and the A1(M) to the east, creates a strong sense of physical and visual containment, limiting impact on the wider countryside.

Due to the strong openness and rural character of SA-19, with long views to the wider countryside, if SA-19 were to be released in its entirety it would likely result in harm to the performance of the wider Green Belt. Although SA-19 has a largely rural character to the east, with long views to open countryside looking north from Cecil Road, the south-western arm of the sub-area has a more semi-urban character, enclosed by built form. Due to its strong sense of enclosure, and relative separation from the open, rural fields to the west of the sub-area, its removal is unlikely to impact the surrounding sub-areas. It is however noted that there are longer views to the north of SA-19, which would require the eastern boundary of the south-western arm to be strengthened. Similarly, SA-20 has a largely rural character in its entirety, however the north-western corner has a strong sense of enclosure, bound by roads and built form on three sides, diminishing the overall sense of rurality. As a result of its strong visual connection with the settlement, and limited links to the wider countryside to the south, its removal is unlikely to impact the wider Green Belt. It is however noted that the intermittent hedgerow to the west would require strengthening.

As a result of the small scale and relative enclosure of SA-23 by the built form of South Mimms and woodland to the west, its release is unlikely to substantially impact the performance of surrounding sub-areas. It is however noted that due to the weak nature of the northern boundary, its release could contribute to a further sense of enclosure in the southern part of SA-24.

Step 4C (Consideration of Boundaries): None of the sub-areas have inner boundaries as they do not adjoin an inset settlement. The outer boundaries for SA-19, SA-20, SA-21 and SA-22 are predominantly readily recognisable and likely to be permanent, however for SA-23, the outer boundaries are formed of weaker boundaries lacking permanence, such as a dispersed treeline and irregular backs of residential properties. It is also noted that the northern boundary of SA-19 is formed of softer features, comprising a dispersed treeline. The combined release of these sub-areas would result in the designation of a new Green Belt boundary around part of the ‘washed over’ settlement of South Mimms. It is noted that the new eastern boundaries of both the western arm of SA-19 and the north-western corner of SA-20, would require strengthening to prevent outward sprawl into the open countryside. Similarly, the northern boundary of SA-23 was identified as weak, and it is noted that some strengthening would be required.

Step 5 (Categorisation): SA-19 meets Purpose assessment criteria moderately, but western part makes a less important contribution to the wider strategic Green Belt. Western part is recommended for further consideration.

SA-20 meets Purpose assessment criteria moderately, but western part makes a less important contribution to the wider strategic Green Belt. Western part is recommended for further consideration.

SA-22 and SA-21 meet Purpose assessment criteria weakly and make a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

SA-23 meets Purpose assessment criteria moderately but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): As this recommendation relates to five sub-areas, the performance against NPPF Purposes is varied. SA-19, SA-20, and SA-23 perform moderately against NPPF Purposes. It is however noted that within these sub-areas, the south-western arm of SA-19, and the north-western corner of SA-20 perform less strongly. The remaining sub-areas, SA-21 and SA-22, perform weakly against NPPF purposes, and play a limited role in respect to the wider strategic Green Belt.

The release of SA-21, SA-22 and SA-23 in their entirety, along with the partial release of the more weakly performing areas within SA-19 and SA-20, would result in the designation of a new Green Belt boundary around part of the ‘washed over’ village of South Mimms. The new boundary would be formed of features which are predominantly readily recognisable and likely to be permanent, although strengthening would be required to limit visual linkages to the wider Green Belt beyond.

It is recommended that SA-21, SA-22 and SA-23, along with the south-western arm of SA-19, and the north-western corner of SA-20, are considered further in combination for release as RC-2, along with further consideration to the inseting of South Mimms.

RC-3 (Parts of SA-27 and SA-28) – Shenley (west of London Road and south-east of Harris Lane)



Step 4A (NPPF Assessment): SA-27 and SA-28, located to the east and west of the ‘washed over’ part of Shenley (respectively), meet the Purposes strongly overall. Both sub-areas perform moderately against Purpose 2, forming wider parts of the gap between Shenley and Borehamwood, and strongly against Purpose 3, preventing encroachment into areas with an unspoilt, rural character. The sub-areas do not meet Purposes 1 or 4.

Step 4B (Strategic Assessment): SA-27 and SA-28 both meet the Green Belt Purposes to a similar extent when compared with the wider Parcels in which they sit. While neither meet Purpose 1, given they do not prevent the outward sprawl of Borehamwood, both perform moderately against Purpose 2 and strongly against Purpose 3, in line with the respective Parcels.

Due to its strong openness and unspoilt rural character of the sub-area, in line with the wider Parcel, as well as its strong visual links with the wider Green Belt, if SA-27 were to be released in its entirety it would likely result in harm to the performance of the wider strategic Green Belt. Similarly, if released in its entirety, SA-28 would significantly reduce the physical and perceived scale of the gap between Shenley and Radlett and harm the overall integrity of this gap by creating additional ribbon development along Radlett Lane.

However, as a result of its very small scale, and the role of strong physical features to the north, south and west, which physically enclose the sub-area, a small area in the far north-western part of the SA-27 does not play a fundamental role in relation to the wider Green Belt. Similarly, the north-eastern part of SA-28 does not play a fundamental role in relation to the wider Green Belt as a result of existing encroachment, visual containment and stronger visual links towards the edge of the washed over part of Shenley.

Step 4C (Consideration of Boundaries): Aside from a small part of SA-28, which adjoins the inset part of Shenley, if SA-27 and SA-28 were to be removed from the Green Belt, this would result in designation of a new Green Belt boundary adjacent to the washed over part of Shenley. While the outer boundaries of both sub-areas are predominantly readily recognisable and likely to be permanent, the eastern boundary of SA-27 is weaker and less readily recognisable, comprising the Catherine Bourne watercourse which is very small in scale and partially culverted, while the north-western boundary of SA-28 consists of a small, intermittently defined hedgerow which does not restrict longer views to the wider Green Belt. In both instances, alternative intermediate features exist which are readily recognisable and likely to be permanent; or, in the case of SA-27, could reasonably be subject to strengthening.

Step 5 (Categorisation): SA-27 meets the Purpose assessment criteria strongly, but the north-western part makes a less important contribution to the wider strategic Green Belt. North-western part is recommended for further consideration.

SA-28 meets the Purpose assessment criteria strongly, but the north-eastern part makes a less important contribution to the wider strategic Green Belt. North-eastern part is recommended for further consideration.

Step 6 (Recommendation): SA-27 and SA-28 both perform strongly against the NPPF Purposes and, in their entirety, play an important role in the wider strategic Green Belt. The far north-western part of SA-27, and the north-eastern part of SA-28, do not play a fundamental role in relation to the wider Green Belt. As these areas both adjoin the part of Shenley which is 'washed over' in the Green Belt, they could only be considered further for release, as RC-3, in the event of Shenley being 'inset' within the Green Belt (in line with the considerations set out in paragraph 140 of the NPPF).

The partial release of these sub-areas would result in the designation of a new Green Belt boundary around the 'washed over' part of Shenley. Boundary features which have the potential to be readily recognisable and likely to be permanent have been identified around these areas, though it should be noted that some strengthening would be required in the north-western part of SA-27 to ensure the

existing hedgerow is consistent and readily recognisable (as well as able to limit visual linkages to the wider Green Belt beyond).

RC-4 (SA-40 and part of SA-41) – South of Theobald Street, Radlett



Step 4A (NPPF Assessment): SA-40 and SA-41, located to the south-east of Radlett, perform moderately overall. For SA-40, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, however performs moderately against Purpose 2, forming part of the gap between Radlett and Borehamwood and maintaining the overall openness and scale of the gap. The sub-area performs moderately against Purpose 3 due to the absence of built form and rural land uses contributing to a largely rural character. It is however noted that the sub-area has a sense of enclosure with limited links to the wider countryside. The sub-area performs weakly against Purpose 4, making a limited contribution to the broader setting of Radlett's historic core.

For SA-41, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, however performs moderately against Purpose 2 forming part of the gap between Radlett and Borehamwood and maintaining the

overall openness and scale of the gap. It is also noted that the Midland Main Line to the east provides an additional boundary which would prevent the perceptual coalescence of settlements. The sub-area performs moderately against Purpose 3 due to the limited built form, large open fields and wooded areas contributing a largely rural character. It is noted that the built form in the northern part of the sub-area, comprising the Radlett Lawn Tennis and Squash Club, acts as an urbanising influence. The sub-area also performs weakly against Purpose 4, making a limited contribution to the broader setting of Radlett's historic core.

Step 4B (Strategic Assessment): SA-40 plays a less important role when compared against the wider Parcel (28). Its small scale, relative sense of enclosure and proximity to urbanising influences means it performs a lesser role against Purpose 3 than the wider Parcel. The railway line to the west, and mature tree planting to the south-east further limit the impact on the surrounding Green Belt.

SA-41 also plays a less important role when compared against the wider Parcel (13). Although the limited physical and visual connection to surrounding sub-areas limits the impact on the wider countryside, the removal of SA-41 in its entirety would significantly reduce the gap between Radlett and Borehamwood due to its scale and positioning within the wider Green Belt. The northern half of the SA-41 however plays a lesser contribution to the wider Parcel as a result of its strong sense of containment and could be considered further while still maintaining the gap between settlements.

Step 4C (Consideration of Boundaries): For SA-40, the inner boundary is readily recognisable and likely to be permanent, however the outer boundaries are more mixed, comprising both readily recognisable and softer features, such as watercourse and a treeline. For SA-41, both the inner and outer boundaries are comprised of both features that are readily recognisable and likely to be permanent, and softer features including a thin tree belt and irregular backs of residential properties and gardens. The combined release of SA-40 and the northern part of SA-41 would result in the designation of a similarly performing Green Belt boundary.

Step 5 (Categorisation): SA-40 meets Purpose assessment criteria moderately but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

SA-41 meets Purpose assessment criteria moderately, but the northern part makes a less important contribution to the wider strategic Green Belt. Northern part is recommended for further consideration.

Step 6 (Recommendation): Both SA-40 and the northern part of SA-41 perform moderately against NPPF purposes and play a limited role in respect to the wider strategic Green Belt. It is noted that their combined release would result in the designation of a Green Belt boundary of a similar performance.

It is recommended that SA-40 and the northern part of SA-41 are considered further in combination for release as RC-4.

RC-5 (SA-49 and SA-50) – South of Borehamwood



Step 4A (NPPF Assessment): SA-49, located to the south of Borehamwood, meets the Purposes moderately overall, and SA-50, located immediately to the east, meets the Purposes strongly overall. Both sub-areas perform weakly against Purpose 1, as a result of their enclosure within the large built-up area of Borehamwood, and weakly against Purpose 2, forming a small, less essential part of the gap between Borehamwood and Greater London (Edgware). SA-49 meets Purpose 3 moderately, preventing encroachment into an area with a largely rural character, while SA-50 meets this Purpose strongly as a result of its more unspoilt rural character and strong openness. The sub-areas do not meet Purpose 4.

Step 4B (Strategic Assessment): Both SA-49 and SA-50 make either a similar or lesser contribution to the Green Belt Purposes as the wider Parcel in which they both sit, though it is noted that SA-50 (in isolation) makes a stronger contribution to Purpose 3 as a result of its predominantly rural land uses and strong sense of openness. Both sub-areas are relatively small in scale, physically and visually contained by well-established man-made and natural features, and thus distinct from the wider Green Belt to the south. As such, if either were to be removed in

isolation, it is considered that there would be no impact upon the performance of the surrounding Green Belt against either Purposes 2 or 3.

Furthermore, in combination, if SA-49 and SA-50 were to be released, there would be limited impact upon the performance of the wider strategic Green Belt. These sub-areas are separated from the wider Green Belt by Barnet Lane to the south, with visual linkage to the wider countryside further limited by the presence of ribbon development along the south side of Barnet Lane (Purpose 3). The gap between Borehamwood and Greater London is such that their removal would not reduce the physical or perceptual scale of the gap between these settlements (Purpose 2). These sub-areas do not play a fundamental role in relation to the wider Green Belt Parcel, and if released in combination would not harm the performance of the wider strategic Green Belt.

Step 4C (Consideration of Boundaries): The inner boundaries of the sub-areas are partly readily recognisable and likely to be permanent. However, it is noted that the inner boundaries of SA-49 comprise weaker features, including an irregular line of trees to the north and an irregular line the back of residential properties and gardens to the west and north-east. If SA-49 and SA-50 were to be removed in combination, this would result in a stronger Green Belt boundary that would be readily recognisable and likely to be permanent, formed of Barnet Lane.

Step 5 (Categorisation): SA-49 meets the Purpose assessment criteria moderately but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

SA-50 meets the Purpose assessment criteria strongly but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-49 performs moderately against the NPPF Purposes, and SA-50 performs strongly against the NPPF Purposes. However, both play a limited role in respect of the wider strategic Green Belt and could therefore be considered further. The release of these sub-area in combination would result in the designation of stronger, readily recognisable Green Belt boundary, formed of Barnet Lane.

SA-49 and SA-50 should be considered further in combination for release as RC-5.

RC-6 (SA-64 and part of SA-51) – North of Elstree Village



Step 4A (NPPF Assessment): SA-64, located to the north of Elstree, meets the Purposes weakly overall. The sub-area does not meet Purpose 1, 2 or 4. It makes a weak contribution to Purpose 3; while the sub-area prevents encroachment to a limited extent, it is characterised by predominantly semi-urban land uses and has been subject to substantial encroachment along its eastern and western edges.

SA-51, located north-east of Elstree and west of Borehamwood, meets Purpose 1 moderately, preventing the outward sprawl of Borehamwood, and Purpose 2 strongly, restricting the merging of Elstree and Borehamwood. The sub-area also meets Purpose 3, albeit weakly due to its predominantly semi-urban character as a result of a significant amount of built form, particularly to the west.

Step 4B (Strategic Assessment): SA-64 plays a less important role than the wider Green Belt Parcel, performing less strongly against both Purposes 2 and 3. The eastern and western edges of SA-64 have already been subject to development and contribute to a semi-urban character; as such, if removed from the Green Belt in isolation, this would not reduce the performance of the adjacent sub-areas against the NPPF Purposes. While there is the potential for some visual impacts upon the

wider Green Belt to the north, the presence of dense tree planting along the northern edge of the sub-area would ameliorate this harm, and furthermore visually prominent built-development (including residential properties at Romeland Court) already somewhat diminish its openness. Overall, the sub-area does not play a fundamental role with respect to the wider Green Belt Parcel, and its release in isolation would not harm the performance of the wider strategic Green Belt.

The western part of SA-51, and eastern part of SA-64, both make very limited contribution to the openness of the Green Belt. They have been subject to historic encroachment (Purpose 3) and do little to maintain the physical or perceptual separation of Elstree and Borehamwood (Purpose 2). If the western part of SA-51 were to be removed in combination with SA-64, it is considered that it would not result in harm to the wider Green Belt and could strengthen the performance of the surrounding Green Belt.

Step 4C (Consideration of Boundaries): The inner boundaries of both SA-64 and SA-51 are readily recognisable and likely to be permanent.

The outer boundaries of SA-64 are partially formed of features that are readily recognisable and likely to be permanent, but the northern boundary is not fully established, partially formed of an intermittent tree belt. The release of the sub-area would therefore result in the designation of a weaker Green Belt boundary than the existing inner Green Belt boundary. However, the northern boundary could feasibly be subject to further strengthening to ensure it is readily recognisable and likely to be permanent.

With regard to SA-51, as noted at Step 4B, the south-western part of the sub-area makes a less important contribution to the wider Green Belt primarily as a result of its lack of openness and shared characteristics with the eastern part of SA-64. There are numerous permutations with regard to intermediate boundary features in the south-western part of the sub-area, including:

- Public footpaths, reinforced by planting;
- The strongly defined, rectilinear edges of existing development, as well as residential properties and gardens;
- The edges of dense woodland;
- Existing public and private made roads.

Step 5 (Categorisation): SA-64 meets the Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

SA-51 meets the Purpose assessment criteria strongly, but the south-western part makes a less important contribution to the wider strategic Green Belt. South-western part recommended for further consideration.

Step 6 (Recommendation): SA-64 performs weakly against the NPPF purposes and plays a limited role in respect of the wider strategic Green Belt and could therefore be considered further. It is noted that the release of the sub-area would result in the designation of a weaker Green Belt boundary. The northern boundary

(formed of an intermittent tree belt) would require strengthening to ensure it is readily recognisable and likely to be permanent.

SA-51 performs strongly against the NPPF purposes in its entirety, but the south-western part of the sub-area, which lies within the 'washed over' part of Elstree, makes a limited contribution to openness or the NPPF Purposes. If it considered appropriate to inset Elstree, then the south-western part of SA-51 could be considered further in combination with SA-64. It is noted that there are numerous permutations with regard to intermediate boundary features in the south-western part of the sub-area. The boundaries of this part have been defined taking into consideration the relative openness (or lack thereof), the point at which denser development transitions to sparser ribbon development, as well as the requirement to identify readily recognisable features that are likely to be permanent.

SA-64 and the western part of SA-51 should be considered further in combination for release as RC-6.

RC-7 (SA-61 and SA-62) – North-east of Bushey Mill Lane/ Little Bushey Lane, Bushey



Step 4A (NPPF Assessment): SA-61 and SA-62, located to the south of North Bushey, respectively perform weakly and moderately overall. For SA-61, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and does not meet Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area does not meet Purpose 3 due to extensive built form and strong sense of enclosure contributing to an urban character. The sub-area does not meet Purpose 4.

For SA-62, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and does not meet Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area does however perform moderately against Purpose 3, with limited built form and predominantly open fields contributing to a largely rural character. It is however noted that the flat topography and thick mature treeline contributes to a strong sense of enclosure. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-areas play a less important role when compared against the wider Parcel (15). As a result of their small scale, isolation from other sub-areas and limited visual links with the wider countryside, the removal of SA-61 and SA-62 are unlikely impact the surrounding countryside. SA-61 has already experienced encroachment and has a strong sense of enclosure as a result of the David Lloyd Leisure Centre and dense woodland to the south along Bushey Mill Lane. Their location between the settlement to the north and predominantly managed and semi-urban land uses to the south, including the Metropolitan Police Sports Club and the Bushey Hall Golf Club, further undermine their contribution to Purpose 3. As a result of their relatively enclosed location, the sub-areas make no discernible contribution to the physical or perceptual separation of settlements.

Step 4C (Consideration of Boundaries): For SA-61, the inner boundary is formed of weaker features that lack permanence, including irregular backs of residential properties and gardens. The outer boundaries however are readily recognisable and likely to be permanent. For SA-62, the inner boundaries to the south and west are formed of features that are readily recognisable and likely to be permanent. The outer boundary to the east is weaker comprising a thin tree line. Their combined release would result in the designation of a stronger Green Belt boundary, however the boundary to the east would require strengthening to ensure that it is durable.

Step 5 (Categorisation): SA-61 and SA-62 both meet Purpose assessment criteria weakly and make a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-61 performs weakly against NPPF purposes, whilst SA-62 performs moderately against the Purposes. Both sub-areas however play a limited role in respect to the wider strategic Green Belt. It is recommended that SA-61 and SA-62 are considered further in combination for release as RC-7.

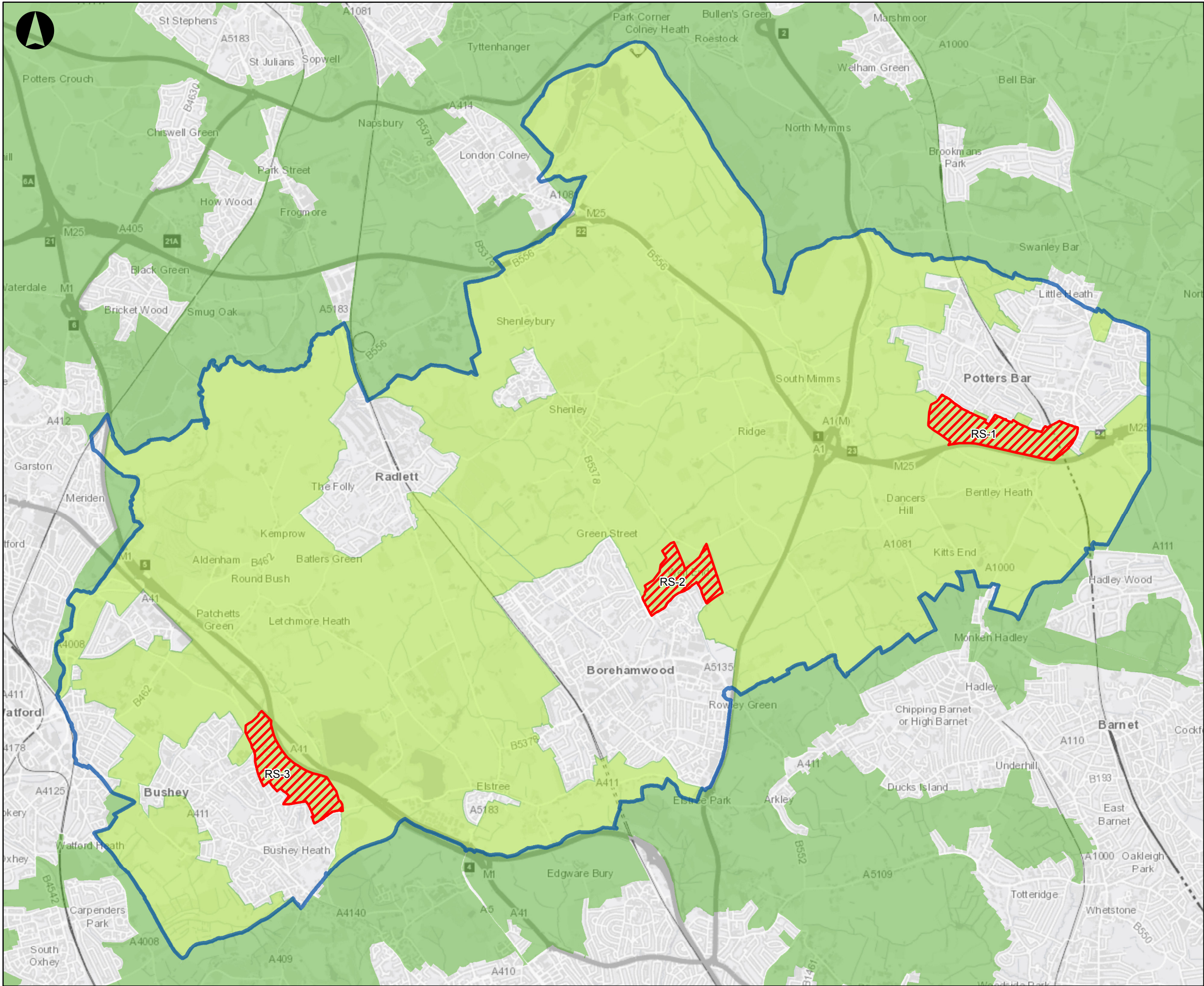
6.4 Sub-areas Recommended as a Strategic Cluster

Four areas, encompassing seven sub-areas, have been recommended strategic clusters. These are illustrated spatially in Figure 6.4.





RS-1 (SA-13 and SA-15) – South of Potters Bar



Step 4A (NPPF Assessment): SA-13 and SA-15, located to the south of Potters Bar, respectively perform weakly and moderately overall. For SA-13, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs weakly against Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area performs weakly against Purpose 3, as a result of the extensive built form and semi-urban character. It is noted that the southern part of the sub-area has a more rural character. The sub-area does not meet Purpose 4.

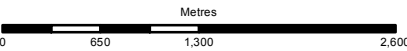


Legend

-  Recommended as Strategic Cluster
-  Hertsmere Boundary
-  Hertsmere Green Belt
-  Neighbouring Green Belt

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Issue	Date	By	Chkd	Appd



ARUP

Client
Hertsmere Borough Council

Job Title
Hertsmere Green Belt Assessment (Stage 2)

Figure 6.4:
Areas Recommended as Strategic Cluster

Scale at A3 1:50,000	
Job No 261001-00	Drawing Status Issued
Drawing No 6.4	Issue P1

For SA-15, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs weakly against Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area performs moderately against Purpose 3 as a result of the absence of built form, visual links with the wider countryside and largely-rural character.

Step 4B (Strategic Assessment): The sub-areas play a less important role when compared against the wider Parcel (35). SA-15 directly adjoins SA-14 and SA-16 to the north, whilst SA-13 directly adjoins SA-11 to the west. The removal of the two sub-areas in combination could impact the performance of surrounding sub-areas against Purpose 3 by completely enclosing SA-14 and SA-16 by built form and contributing to the sense of enclosure for SA-11 and SA-12. It is however noted that SA-11 and SA-12 are semi-urban in character and recommended for release as RA5 and RA6 respectively. As a result of their location between the M25 and the built form of Potters Bar, and strong sense of visual containment, particularly in SA-13 and the north-eastern part of SA-15, their combined release is unlikely to impact the performance of the wider Green Belt.

Step 4C (Consideration of Boundaries): For SA-13 and SA-15, both the inner and outer boundaries of the sub-areas are readily recognisable and likely to be permanent. Their combined release would result in the designation of a stronger Green Belt boundary (roads).

Step 5 (Categorisation): SA-13 meets Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

SA-15 meets Purpose assessment criteria moderately but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-13 performs weakly against NPPF purposes, and SA-15 performs moderately against NPPF purposes, however they both play a limited role in respect to the wider strategic Green Belt. It is noted that their combined release would result in the designation of a Green Belt boundary of increased strength or permanence when compared with the existing boundary.

It is recommended that SA-13 and SA-15 are considered further in combination as RS-1.

RS-2 (Parts of SA-46 and SA-48) – North-east of Borehamwood



Step 4A (NPPF Assessment): SA-46, located to the east of Borehamwood, meets the Purposes moderately overall. The sub-area does not meet Purpose 4. It performs moderately against Purpose 1, preventing the outward sprawl of Borehamwood into open land, and moderately against Purpose 3, preventing encroachment into an area with a largely rural character. The sub-area meets Purpose 2 weakly, forming less essential parts of the gaps between Borehamwood and both Shenley and Potters Bar, which are of sufficient scale and character that the settlements are unlikely to merge. The sub-area does not meet Purpose 4.

SA-48, also located to the east of Borehamwood, meets the Purposes strongly overall. In line with SA-46, the sub-area meets Purpose 2 weakly and does not meet Purpose 4. It performs strongly against Purpose 1, preventing sprawl in the absence of outer boundary features to restrict the scale of growth and regularise the form of development. The sub-area also performs strongly against Purpose 3 as a result of its predominantly open and unspoilt rural character, though it is noted that the western part has fewer visual links to the wider countryside and more substantive encroachment, comprising residential properties and commercial uses.

Step 4B (Strategic Assessment): SA-46 plays a less important role than the wider Green Belt Parcel, performing less strongly against both Purposes 2 and 3. If SA-46 is removed in its entirety, this is likely to harm the wider Green Belt to the north, by substantively reducing the overall physical and perceived scale of the gap between Borehamwood and Shenley (Purpose 2) and diminishing its rurality and visual openness (Purpose 3). SA-48 plays a similar role to the wider Green Belt parcel as a result of its significant contribution to Purposes 1 and 3, though it is noted that the sub-area plays a less important role in preventing the merging of settlements (Purpose 2). Due to the strong openness and unspoilt rural character of SA-48, in line with the wider Parcel, as well as its strong visual links with the wider Green Belt, if SA-48 were to be released in its entirety it would likely result in harm to the performance of the wider strategic Green Belt, particularly to the south and east.

However, the southern part of SA-46 makes little contribution to Purpose 2 as a result of its limited visual connection to the broader gap to the north and as a result of the existing pattern of development to the west. Additionally, this area plays a lesser role in preventing encroachment into the wider countryside (Purpose 3) due its topography, which limits visual connections to the wider countryside to the north and increases connections to adjacent development to the south-west and south. The westernmost part of SA-48, similarly, makes a lesser contribution to the Purposes. This area, which has been subject to some encroachment, is strongly defined by mature, densely established hedgerows, which screen views from the wider countryside and would limit the sense of encroachment into the wider Green Belt to the east (Purpose 3).

The removal of the western part of SA-48 from the Green Belt in isolation may reduce the performance of neighbouring Green Belt sub-areas and would result in an illogical outward expansion of Borehamwood which may be perceived as sprawl. However, in combination, the southern part of SA-46 and the western part of SA-48 represent a logical outward extension to Borehamwood that is proportionate in terms of its scale and form, and there are existing boundaries that could regularise and restrict the scale and form of growth (Purpose 1).

Step 4C (Consideration of Boundaries): The inner boundaries of both SA-46 and SA-48 are defined using strong features that are readily recognisable and likely to be permanent. If released from the Green Belt in combination, they would result in the designation of a weaker boundary than the existing inner Green Belt boundary. However, aside from the identified intermediate boundary within SA-46 (comprising various tree belts / hedgerows of differing consistency), which would require strengthening, it is considered that these features are sufficiently recognisable and likely to be permanent.

Step 5 (Categorisation): SA-46 meets the Purpose assessment criteria moderately, but the southern part makes a lesser contribution to the wider strategic Green Belt. Southern part is recommended for further consideration.

SA-48 meets the Purpose assessment criteria strongly, but western part makes a lesser contribution to the wider strategic Green Belt. Western part is recommended for further consideration.

Step 6 (Recommendation): SA-46 performs moderately against the NPPF Purposes, and SA-48 performs strongly against the NPPF Purposes. However, the southern part of SA-46 and the western part of SA-48 both play a limited role in respect of the wider strategic Green Belt and could therefore be considered further. The release of these areas in combination would result in the designation of weaker Green Belt boundary. The northern boundary (formed of intermittent tree belts / hedgerows) would require strengthening to ensure they are readily recognisable and likely to be permanent.

The southern part of SA-46 and western part of SA-48 should be considered further in combination for release as RS-2.

RS-3 (SA-54 and SA-57) – North-east of Bushey



Step 4A (NPPF Assessment): SA-54 and SA-57, located to the north-east of Bushey Heath, respectively perform weakly and moderately overall. For SA-54, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs weakly against Purpose 2, making no discernible contribution to separation in physical or perceptual terms. The sub-area performs

weakly against Purpose 3, as a result of existing built form and the urbanising influence of the M1, contributing to a semi-urban character. The sub-area does not meet Purpose 4.

For SA-57, the sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, however performs moderately against Purpose 2, forming part of the wider gap between Bushey Heath/Bushey Village and Elstree. The sub-area performs weakly against Purpose 3 as a result of existing built form, urbanising influences of the M1 and direct visual links to Bushey Heath/Bushey Village, contributing to a semi-urban character. The sub-area does not meet Purpose 4.

Step 4B (Strategic Assessment): The sub-areas play a less important role when compared to the wider Parcel (6). SA-54 directly adjoins SA-60 to the north-west and SA-55 (RA-11) to the west, whilst SA-57 directly adjoins SA-56 to the south-east. The release of the sub-areas in combination could impact on the performance of SA-55 against Purpose 3, as it would become almost entirely surrounded by built form. It is however noted that there are limited visual links with SA-55 due to the mature treeline boundary, and this sub-area has an urban character and is also recommended for release. There are also limited visual links with SA-60 and SA-56 as a result of mature treeline boundaries and strong sense of enclosure. As a result of their location between the M1 and the built form of Bushey, and strong sense of visual containment, their combined release is unlikely to impact the performance of the wider Green Belt.

Step 4C (Consideration of Boundaries): For SA-54, the inner boundary is readily recognisable and likely to be permanent. The outer boundaries however are more mixed, formed of both durable boundaries, and softer features lacking permanence such as a Hillfield Brook and a treeline. For SA-57, both the inner and outer boundaries are readily recognisable and likely to be permanent. Their combined release would result in the designation of a Green Belt boundary of a similar performance.

Step 5 (Categorisation): SA-54 meets Purpose assessment criteria weakly and makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

SA-57 meets Purpose assessment criteria moderately but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration.

Step 6 (Recommendation): SA-54 performs weakly against NPPF purposes, and SA-57 performs moderately against NPPF purposes, however they both play a limited role in respect to the wider strategic Green Belt. It is noted that their combined release would result in the designation of a Green Belt boundary of similar strength or permanence when compared with the existing boundary. It is recommended that SA-54 and SA-57 are considered further in combination as RS-3.

7 Conclusions

This Study builds on the Stage 1 Green Belt Assessment (GBA) published in January 2017, which found that the majority of the Green Belt in Hertsmere performs an important role with regard to the NPPF purposes. The more refined and focussed assessment undertaken in this Study complements the conclusions formed in the GBA and aims to demonstrate that HBC has made every effort to identify appropriate land to meet identified needs.

The Study has focused on areas of the Green Belt that might contribute to the ‘five potential development approaches’ identified in the Local Plan Issues and Options public consultation document (September 2017), particularly around the Borough’s existing towns and larger villages. In addition, consideration has been afforded to potential sites for a standalone Garden Village.

Seventy-two sub-areas and nine Garden Village sub-areas, were identified for assessment. To ensure an exhaustive approach, these were initially based on promoted sites and, additionally, ‘further sites’ around potential growth settlements, which were aligned with the Council’s identified development approaches. Sites entirely or largely constrained by major policy constraints were excluded from further assessment, as were any strongly performing parcels which have not been promoted for development. Parcels identified as being weakly performing in their entirety in the Stage 1 assessment were also excluded as they had already been identified as recommended for further consideration. The remaining sites were then adjusted to align with durable man-made and natural features, in order to define the sub-areas for assessment.

The approach to assessing the sub-areas against the NPPF Purposes 1-4 (Step 4A) reflected the more focused, granular nature of the Study, whilst maintaining consistency with the overarching principles of the GBA methodology. Critically, the recommendations of the Study are underpinned by explicit consideration of the role and importance of smaller sub-areas in terms of the function of the wider Green Belt, taking into consideration the Parcel scores from the GBA (Step 4B). Consideration was also given to potential impacts upon the relative strength of the Green Belt boundary and whether new boundaries would be defined ‘clearly, using physical features that are readily recognisable and likely to be permanent’ (in line with Para 139 of the NPPF) (Step 4C).

A sizeable proportion of the sub-areas assessed through this Study, almost 38%, continue to perform one or more of the NPPF purposes strongly. In addition, nearly 49% of sub-areas are considered to make an important contribution to the wider strategic Green Belt. However, reflecting the smaller scale of many sub-areas in the context of the wider Green Belt, as well as the overall role, character and configuration of the Green Belt in Hertsmere, as assessed in the GBA, 26 sub-areas are considered to make a less important contribution to the wider strategic Green Belt. Overall therefore, 37 sub-areas are wholly or partially categorised for further consideration (Step 5).

Step 4C of the assessment afforded consideration to the potential for cumulative harm to the Green Belt should multiple sub-areas be released together, and also whether the release of particular sub-areas might be reliant on other alterations to

the Green Belt (for example, where the release of sub-areas in isolation might result in 'holes' in the Green Belt, which relate poorly to existing inset areas). These considerations are reflected in Study's recommendations. Overall:

- 14 areas are recommended for further consideration in isolation ('RA's) – if removed from the Green Belt, these areas are unlikely to harm the performance of the wider Green Belt;
- 7 areas are recommended for further consideration in combination ('RC's) - if removed from the Green Belt in combination, these areas are unlikely to harm the performance of the wider Green Belt, but the constituent sub-areas could not be removed in isolation without resulting in harm;
- 3 areas are recommended for further consideration as a strategic cluster ('RS's) – larger swathes of Green Belt for consideration by the Council which are unlikely to harm the performance of the wider Green Belt if removed, and where there are opportunities to ameliorate harm.

Specifically, in relation to recommended areas RC-2 and RC-3, these recommendations are reliant upon further possible alterations to Green Belt boundaries which are not examined as part of this Study. These areas adjoin the washed over villages of South Mimms and Shenley (respectively), which are both 'washed over' in the Green Belt. The Council should afford further consideration to whether these villages, as well as other 'washed over' villages throughout the Borough, should be 'inset' within the Green Belt (in line with the considerations set out in paragraph 140 of the NPPF).

This Study also involved a bespoke assessment of two proposed Garden Villages. The assessment identified those areas within the Garden Villages, which perform most strongly against the NPPF Purposes, and also considered the potential for harm to the wider strategic Green Belt, as well as how harm could be limited or ameliorated. Part of Area-c and Area-h were recommended for further consideration. While it is acknowledged that, if released from the Green Belt, these areas would result in some localised harm in relation to Purpose 3 (due to the predominantly open and rural character of much of the sites), the areas recommended are considered to be least harmful to the NPPF purposes overall in the context of the area of land available for a Garden Village, and harm to the wider strategic Green Belt is likely to be limited.

Aside from excluding sub-areas which are wholly or predominantly affected by absolute constraints, it should also be noted that all recommendations have been made based on the performance of sub-areas / Garden Village areas against NPPF purposes, and their performance in the context of the wider Green Belt. Suitability in terms of sustainability, deliverability, infrastructure and wider planning considerations has not been taken into account. These recommendations will ultimately need to be balanced against the findings of other technical work and the Council's preferred spatial strategy as part of the wider site selection process. The recommendations set out in this Study will not automatically lead to the release of land from the Green Belt. Ensuring maximum protection for the Green Belt, in line with national policy, continues to be a core planning principle in the formulation of Local Plan policy, and further decision making by the Council in reviewing the Local Plan will determine which areas, if any, might be released

from the Green Belt. This Study will ultimately 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 Green Belt boundary in Hertsmere to be altered through the Local Plan review. At that time, the Council will need to consider the Green Belt boundary having regard to its intended permanence in the long term, so that any proposed boundaries are capable of enduring beyond the plan period.

Appendix A

Policy, Guidance & Experience

A1 Overview

The purpose of a Green Belt Assessment is to provide evidence of how different areas perform against the Green Belt purposes, as set out in national policy. Planning authorities may then take this into account alongside other evidence in making decisions about possible changes to Green Belt boundaries.

Hertsmere GBA set out the relevant national and local policy framework for undertaking such an assessment, as well as relevant guidance and good practice identified elsewhere. This has not been repeated here; however, where it is still current it continues to shape the methodology for this Stage 2 Assessment. This section therefore provides an update on policy, guidance and experience elsewhere since the initial assessment was undertaken.

A2 Policy and Guidance

A2.1 National Planning Policy Framework

Since the GBA, changes have been made to national planning policy. On the 24 July 2018, the Government published the revised National Planning Policy Framework (NPPF). The policies in the 2012 NPPF will apply for the purpose of examining plans, where those plans are submitted on or before the 24 January 2019. Since the Hertsmere Local Plan will not have been submitted for Independent Examination by this point in time, the 2018 NPPF is the relevant policy document and therefore any changes to Green Belt policy will need to be considered in developing the methodology for the GBA Stage 2.

The 2018 NPPF states in paragraph 3, that it should be read as a whole, and general references to planning policies should be applied in a way which is appropriate to the type of plan being produced. This reflects that chapter 3 on plan-making introduces the concept of strategic and non-strategic policies, which may be set out in different types of plan but together comprise the development plan for the area.

It should be noted that most policies relating to Green Belt remain unchanged, i.e.: the overarching aim, the five purposes, the intended permanence of the Green Belt, the need to take into account sustainable patterns of development, alterations only to be undertaken in exceptional circumstances and the need for positive planning in the use of Green Belt land. The changes included in the 2018 NPPF provide further clarity on the factors which local planning authorities must take into account when proposing release of land from the Green Belt. This includes ensuring the redevelopment of brownfield land is maximised and density of development is optimised before amendments to Green Belt boundaries are considered. The need to demonstrate how the impact of removing land from the Green Belt will be compensated is also introduced.

A2.2 National Guidance

No additional guidance relevant to the preparation of Green Belt assessments has been issued in the intervening period since the preparation of GBA Stage 1. It remains the case that there is no nationally accepted methodology for conducting Green Belt assessments.

A2.3 Local Policy

Five councils in South West Hertfordshire are preparing a joint strategic plan to help deliver development and infrastructure across the authorities. The new plan will be prepared between Hertsmere Borough Council, Watford Borough Council, Three Rivers District Council, St Albans District Council and Dacorum Borough Council. The Plan will seek to enhance collaboration on strategic planning matters across the area, and how to plan and deliver strategic sites more effectively. This Plan is in the early stages of development and therefore does not impact on this assessment.

A3 Legal Precedents

This section provides a summary of relevant recent legal precedents, (in addition to those already explored in the GBA), established through Planning Appeals and Independent Examinations of Local Plans, which have helped to inform the approach taken to the Green Belt methodology. It should be noted, however, that all of these precedents were made within the context of the 2012 NPPF. It will remain to be seen whether any of these precedents will be challenged as the 2018 NPPF is applied to planning decisions and plan making.

Planning Appeals

As discussed in the GBA, the Solihull (2015)²³ and Calverton (2015)²⁴ appeals illustrate the need for a robust Green Belt Assessment to demonstrate exceptional circumstances for Green Belt amendments.

Subsequently, the Turner judgement (2016) (and other case law) has highlighted important considerations surrounding the interpretation of ‘openness of the Green Belt’ and is therefore relevant to the assessment of land against the Green Belt purposes (in particular, Purpose 3). In his judgment, LJ Sales noted the following:

‘There is an important visual dimension to checking “the unrestricted sprawl of large built-up areas” and the merging of neighbouring towns, as indeed the name “Green Belt” itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside, and “safeguarding the countryside from encroachment” includes preservation of that quality of openness. The

²³ Secretary of State CLG (2015) *Town and Country Planning Act 1990 – Section 78, Appeal by Lioncourt Homes on Land at Tidbury Green Farm, Fulford Hall Road, Tidbury Green, B90 1QZ*

²⁴ Calverton Parish Council (2015) *EWHC 1078 (Admin)*

preservation of “the setting ... of historic towns” obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields²⁵.’

Appeal cases in Three Rivers²⁶ and Cheshire West and Chester²⁷ further highlight the need to carefully consider ‘openness’. In the former case, the Inspector concluded the proposal for three dwellings should be allowed as it constituted limited infill development in a village and as appropriate Green Belt development, the impact of the proposal on openness did not need to be assessed; however, that being said, the Inspector concluded that, regardless, any possible impact on openness would be offset by the removal of an existing structure with a similar footprint to the proposed development.

‘I therefore conclude that the proposal would constitute limited infill within a village and would therefore not be inappropriate development within the Green Belt. Accordingly, there is no need to examine if very special circumstances exist to outweigh any harm arising from inappropriateness. ...

In view of my finding that the proposal is not inappropriate development, the impact on openness does not fall to be formally considered, but the impact of proposal on the openness of the Green Belt would be offset to a large degree by the removal of the barn that has a similar footprint to the proposed houses.’

The case in Cheshire concerned plans for a new home to be developed on previously developed Green Belt land. The site concerned was a builder’s yard on the edge of washed-over village. The Inspector concluded that it could not be considered infill development, given that it was widely spaced from neighbouring houses and has frontages onto different roads. Further the development would urbanise the site and its surroundings, thereby diminishing the openness of Green Belt. The appeal was accordingly dismissed.

‘Indeed, in line with the 2016 *Turner v Secretary of State and East Dorset Council* judgement the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Such an approach would be far too simplistic and ignore the wider aspects of openness which goes beyond the physical effect of buildings or structures. Factors relevant include how built up the Green Belt is now and how built up would it be after development has taken place. Consequently, although it may be accepted that the proposal to redevelop a brownfield site may result in a reduced volume and footprint compared to the buildings and structures currently in place, there are wider factors that must be taken into account in defining the effect of the proposal on openness.

In assessing the matter of openness there are a number of ways of determining whether there would be encroachment into the Green Belt. The effect of development as encroachment on the countryside may be in the form of loss of openness or intrusion. The Framework identifies that openness is an essential characteristic of the Green Belt.’

The Secretary of State approved plans to build a replacement secondary school and new homes on Green Belt land east of Guildford, after ruling that very special

²⁵ *Turner v Secretary of State CLG and East Dorset Council* (2016) *EWHC 2728 (Admin)*

²⁶ The Planning Inspectorate (2018) *Appeal Ref: APP / P1940/W/17/3183388* – Clovercourt Ltd v Three Rivers District Council

²⁷ The Planning Inspectorate (2018) *Appeal Ref: APP/ A0665/ W/ 17/ 3190601* – Clegg v Cheshire West & Chester Council

circumstances had been demonstrated²⁸. He agreed with the Inspector that the scheme represented a significant development in the Green Belt which would, inevitably and significantly reduce its openness and would erode the open context of the village. Noting the substantial harm to the Green Belt, he ruled that the provision of new housing and a new school carried greater weight.

The Inspector's note²⁹ for this appeal highlighted some key considerations in relation to Green Belt, which are relevant to this assessment:

- The two essential attributes of the Green Belt are its permanence and openness, in line with NPPF (2012, paragraph 79).
- The key element to assess is the effect that a development has on the openness of the Green Belt.
- The 'concept of 'openness' is generally considered to be land being free from built development.'
- Although openness should be assessed on an individual site / area basis, the cumulative impact on the Green Belt of development on adjacent sites / areas should be considered.

Independent Examinations of Local Plans

Issues relating to Green Belt Assessment highlighted at recent Independent Examinations of Local Plans, include:

- Welwyn Hatfield (2017)³⁰: The Inspector stressed the need to ensure sufficient granularity in identifying land parcels in a Stage 2 Assessment; the importance of assessing openness as opposed to landscape; the need for assessments to consider local circumstances when determining essential areas to retain and preserving settlement gaps; queried whether local considerations, if used, should be accorded the same weight as the NPPF Purposes; and advocated that it is pointless to carry out Green Belt Assessment for sites affected by major policy constraints.

[The Local Plan development strategy is not sound], 'in part because there was insufficient justification for the failure to identify sufficient developable sites within the Green Belt. This is largely because the phase 1 Green Belt Review was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas. Additionally, the phase 2 Green Belt Review, which did look at a finer

²⁸ Ministry of Housing, Communities and Local Government, Secretary of State (2018) *Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd and The Howard Partnership Trust*

²⁹ The Planning Inspectorate (2017) *Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust*, APP/ Y3615/W/16/3151098

³⁰ Mel Middleton, Inspector (December 2017) *Welwyn Hatfield Local Plan Examination Green Belt Review*

grain of sites, does not appear to have examined all of the potential development sites adjacent to the urban areas.

Furthermore that study, which combined a more refined examination, of the contribution that sites made to Green Belt purposes, with an overall examination of development considerations, appears to have incorporated an examination of landscape character into the consideration of openness. Openness considerations in a Green Belt context should only be concerned about the absence of built development and other dominant urban influences. They should not be concerned about the character of the landscape.

.....

There must be a limit beyond which the development of undeveloped land between settlements, be they neighbouring towns or nearby smaller settlements, should not proceed. Exactly what that is in terms of distance is debatable and it could well be different in the context of the merging of neighbouring towns to the context of maintaining the settlement pattern. I note that the Council has referred to a kilometre, whereas other studies have used a mile and even five kilometres in the context of neighbouring towns. What is significant however is perception and a kilometre gap with limited development in a landscape of rolling topography, where the settlements are not visible one from the other, is probably more valuable than five kilometres in flat country with more sporadic urban development in between and such that the settlements are clearly visible one from the other.

.....

There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites however they are defined.'

- Redbridge (2018)³¹: The Inspector emphasised that a Green Belt Review should focus on assessing the Green Belt against the NPPF purposes. Where no historic towns exist, it is reasonable to exclude Purpose 4 from an assessment. Further, although Purpose 5 is not particularly useful for evaluating sites, the rationale expressed for leaving out this purpose must be robust.

'The assistance the Green Belt gives to urban regeneration is assumed to be nil because all brownfield sites with reasonable prospects of development have been identified. That view is flawed as a matter of principle because the aims of the Green Belt are long term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites.'

The following Independent Examinations of Local Plans do not address Green Belt Assessments per se but nevertheless highlight the sorts of factors that might be considered in developing an exceptional circumstances case and therefore of potential relevance when developing the assessment methodology:

³¹ David Smith, Inspector, (24 January 2018), *Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030*

- Guildford (2018)³²: The Inspector highlighted the need to demonstrate strategic level exceptional circumstances to justify the release of Green Belt and also the local level exceptional circumstances for the release of specific sites.
- Vale of White Horse (2016)³³: The Inspector stated that a revision of the Green Belt boundaries ‘is not inherently unsustainable’ and reiterated that the Ministerial Statement in March 2014, which indicated that unmet housing needs are unlikely to represent the very special circumstances necessary to justify inappropriate development in the Green Belt, is not relevant for plan-making. The Inspector accepted that there were sufficient exceptional circumstances to justify the release of sites from the Green Belt, taking into consideration total objectively assessed housing need, local housing needs in specific areas, the limited potential for development within existing settlement, tightly drawn Green Belt boundaries, other absolute land constraints, unsustainability of other spatial options and the suitability and deliverability of the sites in question in terms of accessibility to existing settlements and services.
- Birmingham (2016)³⁴: In the Plan, the Council proposed two strategic Green Belt releases. In determining whether the exceptional circumstances for their release from the Green Belt had been justified, the Inspector noted that both would lead to encroachment into the countryside but judged that this harm would be outweighed by the ‘exceptional, and possibly unique scale’ of unmet housing need in the city, which can only be effectively addressed through amendments to the Green Belt boundary. The Inspector’s conclusion was that even taking consideration of the Council’s approach to site selection, which aimed to prioritise brownfield land and additionally sought to maximise the yield from each site, the scale of unmet need would remain exceptional. The Inspector further noted that the release of these two sites would not ‘lead to ‘unrestricted sprawl’, and both have defensible boundaries formed by main roads and topographical features.’

A3.1 Experience Elsewhere

The following sub-section provides a summary of stage 2 Green Belt assessments undertaken by neighbouring authorities, and a brief overview of the methodology taken. Plus, a summary of the approaches taken in neighbouring authorities and elsewhere to identify sub-areas for stage 2 Green Belt assessments. Key points to note:

- Consistency of approach between Stage 1 and Stage 2 Green Belt assessments, in terms of assessment criteria.

³² Jonathan Bore, Inspector (23 March 2018) *Examination of the Guildford Borough Local Plan: Strategy and Sites, Inspector’s Questions and Comments (No.1)*

³³ Malcolm Rivett, Inspector (25 May 2016) *Vale of White Horse Local Plan 20131: Part 1 Examination – Inspector’s Interim Findings.*

³⁴ Roger Clews (11 March 2016) *Report on the Examination of the Birmingham Development Plan*

- Variety of approaches taken to identify sub-areas for Stage 2 assessments.

It should be noted that the timescales for undertaking some of the Green Belt reviews pre-date the NPPF, whilst others have not been subject to Independent Examination. In identifying good practice from the approaches adopted by neighbouring authorities, these factors should be taken into account to ensure that the methodology adopted is sound and reflects the latest requirements of the 2018 NPPF.

A3.1.1 Neighbouring Authorities Stage 2 Approaches

Table A1 sets out the Green Belt assessments completed by the neighbouring authorities. The approach taken in neighbouring authorities (Dacorum and Welwyn Hatfield) has been broadly the same for Stage 1 and 2 reviews. The exception is St Albans; however, it is judged that their Stage 2 study had a different focus and therefore the methodology is correspondingly divergent.

Table 2.1: Neighbouring Local Authorities Green Belt Assessment Process

Local Authority	GBA Stage 1	GBA Stage 2
Dacorum	✓	✓
St Albans	✓	✓
Three Rivers	✓ (Not published)	-
Watford	✓ (Not published)	-
LB Harrow	-	-
LB Barnet	In progress	-
LB Enfield	✓	-
Welwyn & Hatfield	✓	✓

Dacorum

Arup prepared the Dacorum Borough Council Stage 2 Green Belt Review and therefore are fully aware of the approach taken. The methodology proposed in this study is aligned in terms of approach.

Welwyn Hatfield

Welwyn Hatfield completed their Stage 2 Green Belt Review in 2014. The assessment criteria for the Stage 2 study is generally consistent with the Stage 1 study and uses the same terminology to classify the extent to which each site contributes towards each Green Belt purpose. For Stage 2, sites identified as performing weakly against the five purposes in the Stage 1 study (both strategic sub-areas and small scale sub-areas) were assessed. The Stage 2 report also assessed sites identified in the Strategic Housing Land Availability Assessment and Gypsy and Traveller Land Availability Assessment, which were not assessed as part of Stage 1. It should be noted that a recent Local Plan hearing, the approach taken in Welwyn Hatfield has been questioned by the Inspector. This is discussed further in Section 2.4.

St Albans

The Green Belt Review: Sites and Boundaries Study investigated the sub-areas identified in the Part 1 study as contributing least towards the Green Belt purposes. The intention was to identify potential sites within the sub-areas for potential release, their associated potential development capacity and rank the sites in terms of suitability for release. The Part 1 study focused on assessing against Green Belt Purposes; however, the Part 2 study changed focus and assessed the sub-areas against: Green Belt purposes, constraints, sustainable patterns of development and landscape appraisal and sensitivity. Following which recommendations were made regarding boundaries, indicative layouts and potential development capacities.

A3.1.2 Sub-area Identification

Table A2 summarises the approach taken in neighbouring authorities and elsewhere to identify sub-areas for stage 2 Green Belt assessments.

Table A2 Review of Green Belt Methodologies – Sub-area Identification

Local Authority	Date	Approach taken to identifying Sub-areas
Dacorum Borough Council	2016	The study assessed three strategic and one small scale sub-areas that had been identified in the Stage 1 Green Belt Review. In accordance with the Council's brief, the study also considered land parcels adjacent to existing urban areas of towns and large villages as defined in the Dacorum Adopted Core Strategy. In rural areas, parcels were defined around one specific area which had been identified as playing a particularly important role in maintaining the settlement pattern in Stage 1 Green Belt Review. Boundaries in both instances were defined using defensible and permanent boundary features and took into account the local context.
St Albans District Council	2014	The Study assessed the eight-strategic sub-areas in St Albans District Council which were identified in the Green Belt Part 1 as contributing least towards the five Green Belt purposes. The report includes a summary of key findings from Part 1 to explain why the sub-areas contribute least towards Green Belt purposes. A full assessment of all eight strategic sub-areas was undertaken, and the assessments reported separately. The small-scale sub-areas identified in the Part 1 Study were not considered in this study.
Welwyn Hatfield Borough Council	2014	The Welwyn Hatfield Part 2 Study assessed a range of Green Belt sites, including: 'Strategic sub-areas' (as identified in the Part 1 Study) 'Small scale sub-areas' and areas for 'Boundary adjustment' recommended for further assessment in the Part 1 Study Sites identified in the Strategic Housing Land Availability Assessment Sites identified in the Gypsy and Traveller Land Availability Assessment This approach was however criticised during the Local Plan Examination. Although the Review assessed finer grain sites, it was not considered to fully examine all of the potential development sites adjacent to urban areas.
Cheshire East Council	2015	The Green Belt Parcel Assessment provided further detailed assessment on smaller parcels of land: Around settlements either partially or fully inset by the Green Belt, within General Areas identified in the Stage 1 Assessment as providing a 'contribution' or 'no contribution' to the Green Belt (excluding General Areas that were identified as providing a 'major' or 'significant' contribution); and Around all settlements identified as Principle Towns, Key Service Centres and Local Service Centres Sites included in the Local Plan Strategy (Submission Version), not covered by the above criteria, were assessed but reported separately.
Cheshire West and Chester Council	2013	The Stage 2 Green Belt Review re-assessed all of the ten Areas reviewed as part of Stage 1. This formed the starting point to identify resultant land parcels within the 10 Areas, which could potential be released from the Green Belt.
Royal Borough of Windsor and Maidenhead	2016	The Edge of Settlement Analysis: Green Belt Purpose Assessment considered all land on the edge of those settlements which are themselves excluded from the Green Belt. To ensure a comprehensive assessment all areas of land were considered regardless of whether it had been promoted by the landowner as being available for development.

Local Authority	Date	Approach taken to identifying Sub-areas
Aylesbury Vale District Council	2016	<p>The Aylesbury Vale Green Belt Assessment Part 2 assessed the ‘general areas’ and ‘sub-parcel areas’ that had been identified in Part 1 of the assessment as warranting further consideration for potential removal from the Green Belt, as well as other options the Council were considering for land within the Green Belt.</p> <p>The areas for further consideration included the following:</p> <p>General Areas, which scored weakly overall against the NPPF purposes</p> <p>Whole General Areas or clusters of General Areas, which performed medium or strongly scoring against the NPPF purposes but have particular characteristics or synergies with neighbouring weaker General Areas</p> <p>Medium or strongly scoring General Areas where there is clear scope for sub-division to identify weakly performing ‘sub-areas’, including the presence of boundary features which have the potential to be permanent and recognisable</p> <p>Non-Green Belt General Areas, which could be considered for inclusion in the Green Belt.</p>