

Hertsmere Borough Council

Hertsmere Green Belt Assessment - Additional Sub-Area Assessment

Draft Report

| 27 March 2024



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Job number 302102-00

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Document title Main Report
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File reference

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A.1 Site Pro formas

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1. Scope of additional work

Arup has been appointed by Hertsmere Borough Council (HBC) to undertake a further Stage 2 Green Belt Assessment for nine additional sites. This study methodology aligns with that in the original Arup Green Belt Assessment Stage 2 (GBA Stage 2)¹, published in 2019. It is also consistent with Arup's Additional Sites Assessment, published in 2020.

The purpose of this GBA Stage 2 Additional Sites review is to provide evidence from a more refined and focussed assessment of the potential sites against the Green Belt criteria, as set out in the National Planning Policy Framework (NPPF, December 2023)² (NPPF). Although the NPPF has been updated multiple times since the original study in 2019, the overall aims for Green Belt and its associated purposes have remained unchanged and therefore the original approach remains valid.

The assessment evaluated how well the sites meet the Green Belt purposes set out in the NPPF and made recommendations for their future designation in the Local Plan process. HBC may take the findings of the assessment into account alongside other evidence in making decisions about their Local Plan housing and employment location strategy and site allocations.

The additional sites were not originally assessed as part of the GBA Stage 2 assessment. As a result of further work on the emerging Local Plan, a decision was made by Officers to assess these nine additional sites to ensure that HBC has made every effort to consider appropriate land to meet identified housing and employment need, leaving 'no stone unturned'.

The report is structured as follows:

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

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

¹ Arup (2019) Green Belt Assessment Stage 2. Final report and annexes available at: <https://www.hertsmere.gov.uk/Planning--Building-Control/Planning-Policy/Local-Plan/New-Local-Plan/Supporting-Studies.aspx> [Accessed on 12/03/24]

² Department for Levelling Up, Housing & Communities (2023) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf [Accessed on 12/03/24]

2. Methodology

The approach taken to assessing the additional sites is consistent with the methodology set out in the GBA Stage 2 report (section 3)³. This involves a more focussed and finer grain assessment of sub-areas following the Stage 1 assessment of the whole Green Belt. The full alignment with the GBA Stage 2 methodology ensures consistency of assessments and the comparability of recommendations for all sites being considered for allocation. The methodology for GBA Stage 2 was previously consulted on with Duty to Cooperate partners.

The process involved the following, (illustrated in Figure 1):

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

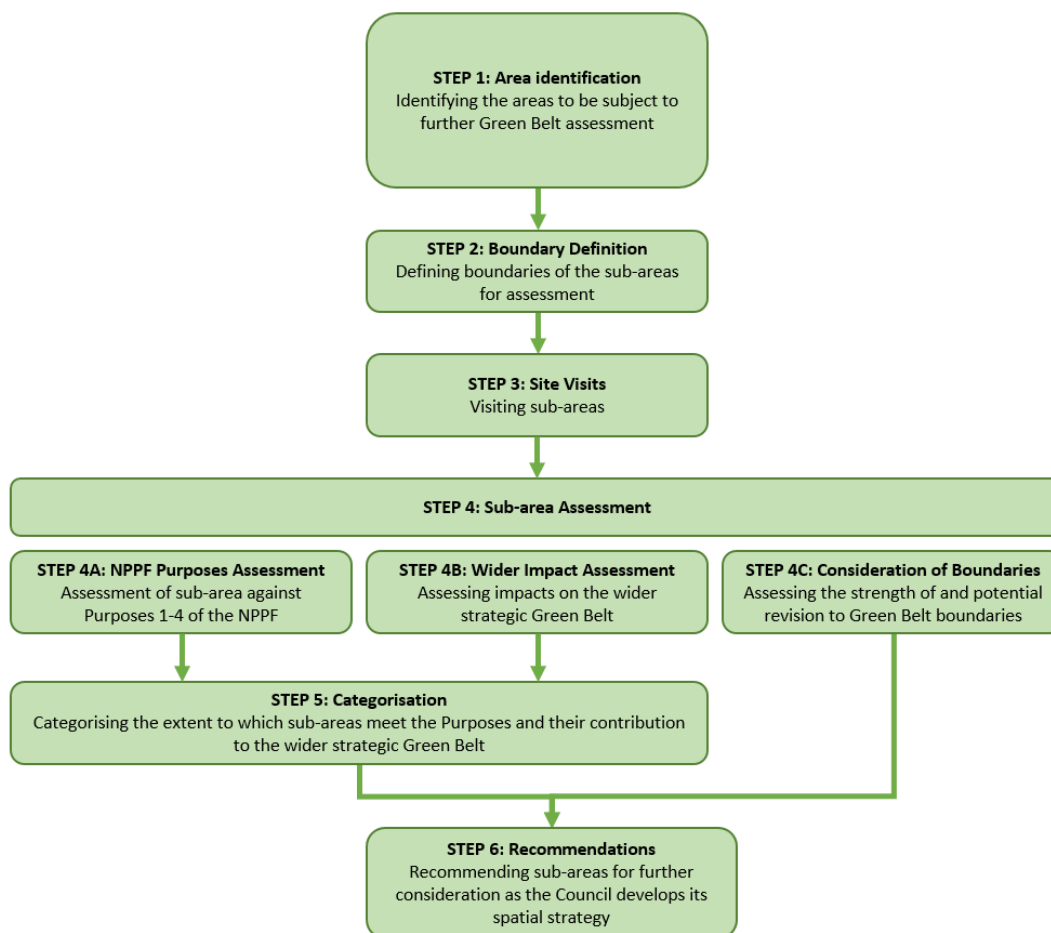


Figure 1 GBA Stage 2 Methodology Diagram

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

2.1 Step 1: Area Identification

When reviewing promoted sites in preparation for the 2023 Regulation 18 public consultation, Hertsmere Borough Council identified that a limited number of areas (see Figure 2), close to existing settlements, had not been assessed in the original Stage 2 GBA or the 2020 Additional Sites Assessment. As a result, HBC appointed Arup to assess these areas, using the same methodology as the previous assessments.

These sites were filtered against major policy constraints (as defined in the original Stage 2 GBA) (Figure 3).

2.2 Step 2: Sub-area Boundary Definition

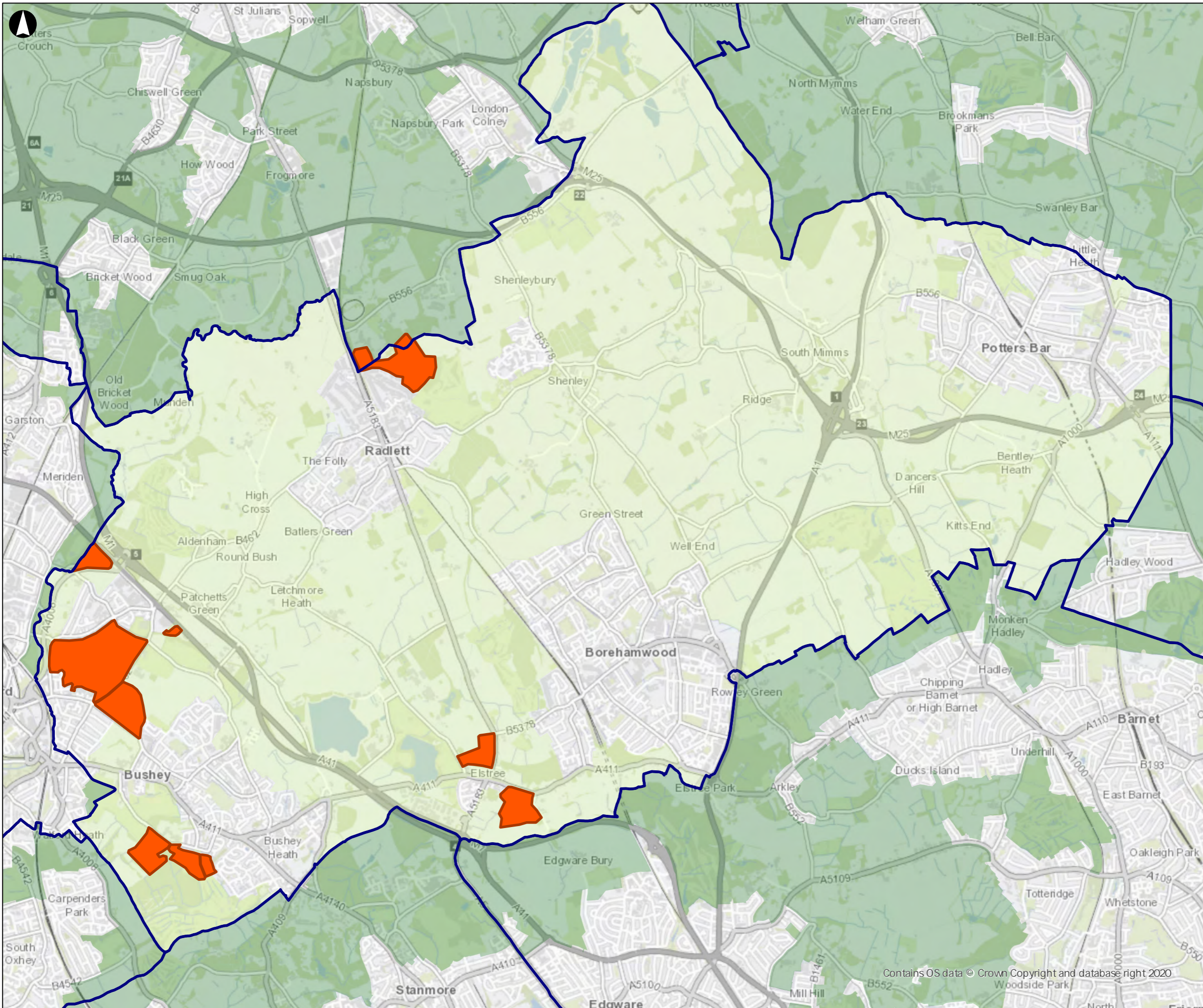
Step 2 involved defining suitable boundaries for the assessment areas (i.e. sub-areas), which are defensible against policy. Paragraph 148(f) of the NPPF requires Green Belt boundaries to be defined ‘clearly, using physical features that are readily recognisable and likely to be permanent’. It is therefore logical to define assessment sub-areas to reflect this principle from the outset. This approach was also used in the original Stage 2 GBA.

Sub-area boundaries were defined on the basis of a desk-based assessment using the same features as the GBA Stage 2 assessment, specifically permanent and defensible boundary features, such as motorways, A and B roads, railway lines, treelines and the back of residential properties and gardens. The suitability and strength of the boundaries was reviewed on site and amended as necessary. Each sub-area was assigned a unique reference number (Figure 4). For continuity, this numbering follows on from that in the 2020 Additional Sites Assessment.

Figure 5 shows the Green Belt parcels (Stage 1 GBA), sub-areas and Garden Village sites (Stage 2 GBA), and sub-areas from the 2020 and 2024 Additional Sub-areas for Assessment studies.

2.3 Steps 3-6

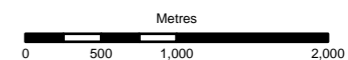
For Steps 3 to 6, this Assessment used the same methodology as the Stage 2 GBA. It is therefore not repeated here.



Legend

- Hertsmere Green Belt
- Neighbouring Green Belt
- Local Authority boundaries
- Additional Sites

Coordinate System: British National Grid



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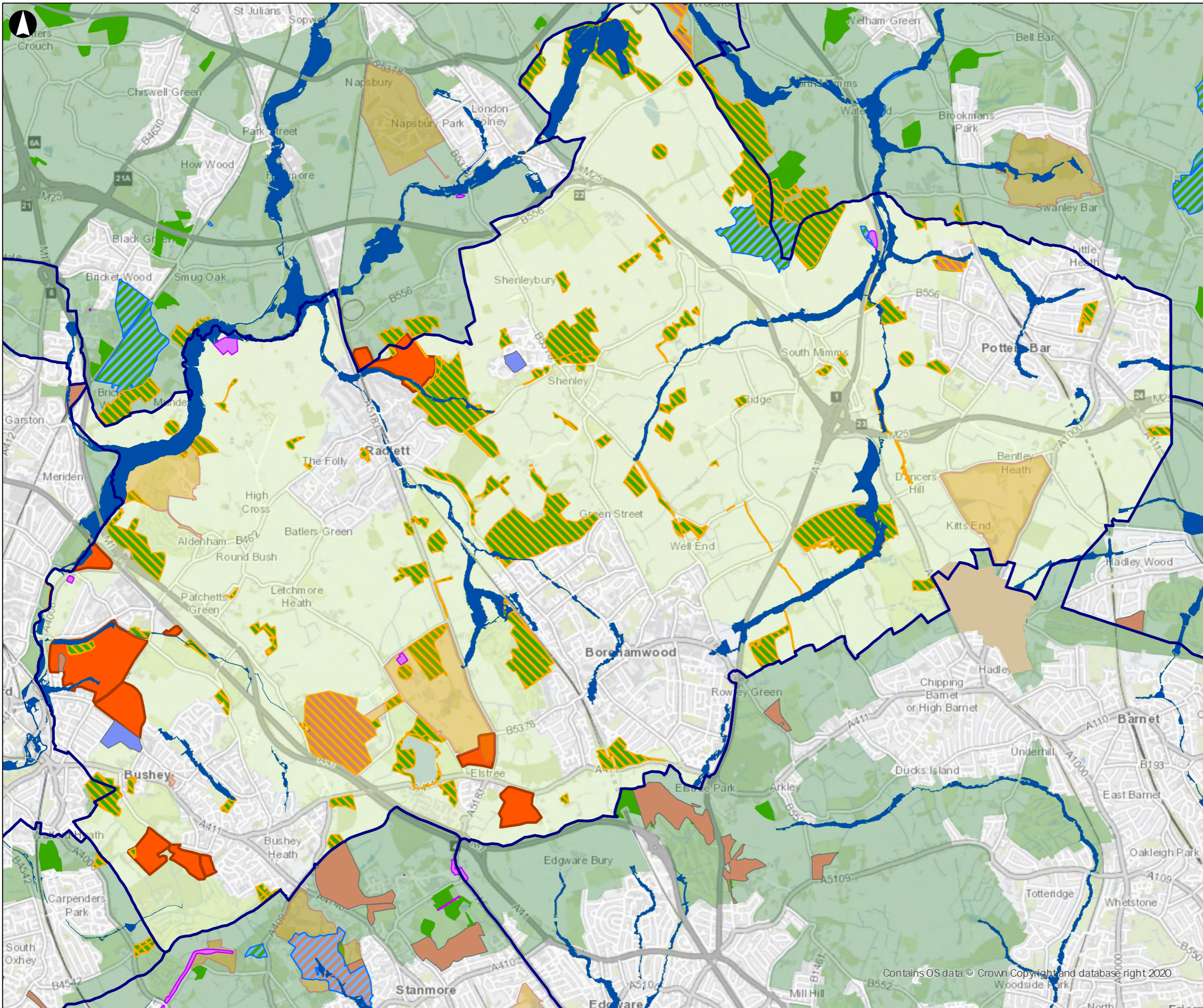
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**Figure 2: Additional sites for
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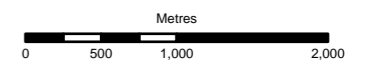
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Legend

- Land Held in Trust
- Flood Zone 3b
- Flood Zone 3
- Local Wildlife Sites
- Sites of Special Scientific Interest
- Scheduled Monuments
- Local Nature Reserves
- Historic Parks & Gardens
- Historic Battlefields
- Ancient Woodland
- Hertsmere Green Belt
- Neighbouring Green Belt
- Local Authority boundaries
- Additional Sites

Coordinate System: British National Grid



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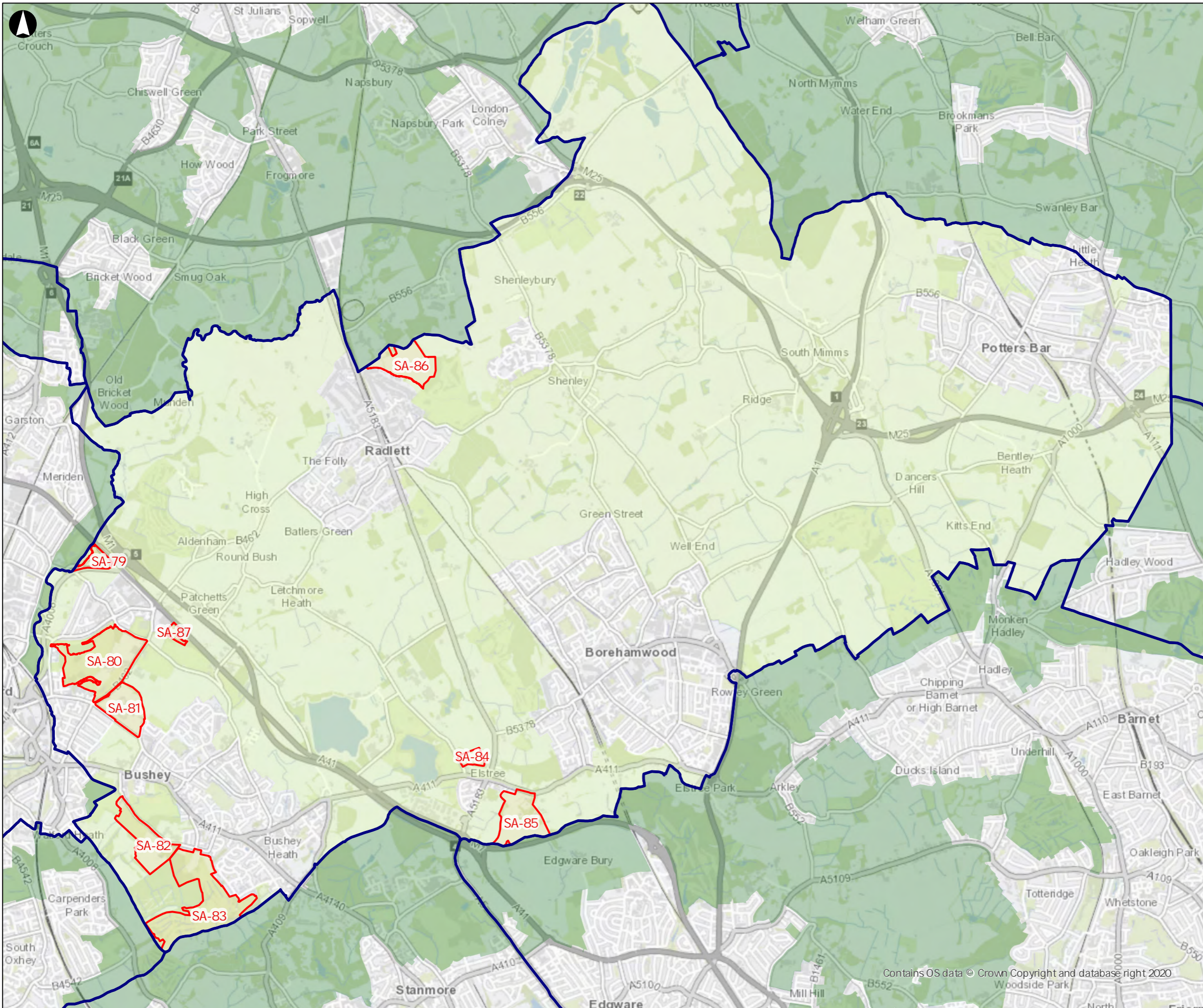
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**Figure 3: Additional sites for
assessment and major policy
constraints**

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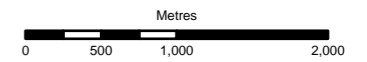
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Project Number	Rev
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Legend

- Additional Sub-Areas
- Hertsmere Green Belt
- Neighbouring Green Belt
- Local Authority boundaries

Coordinate System: British National Grid



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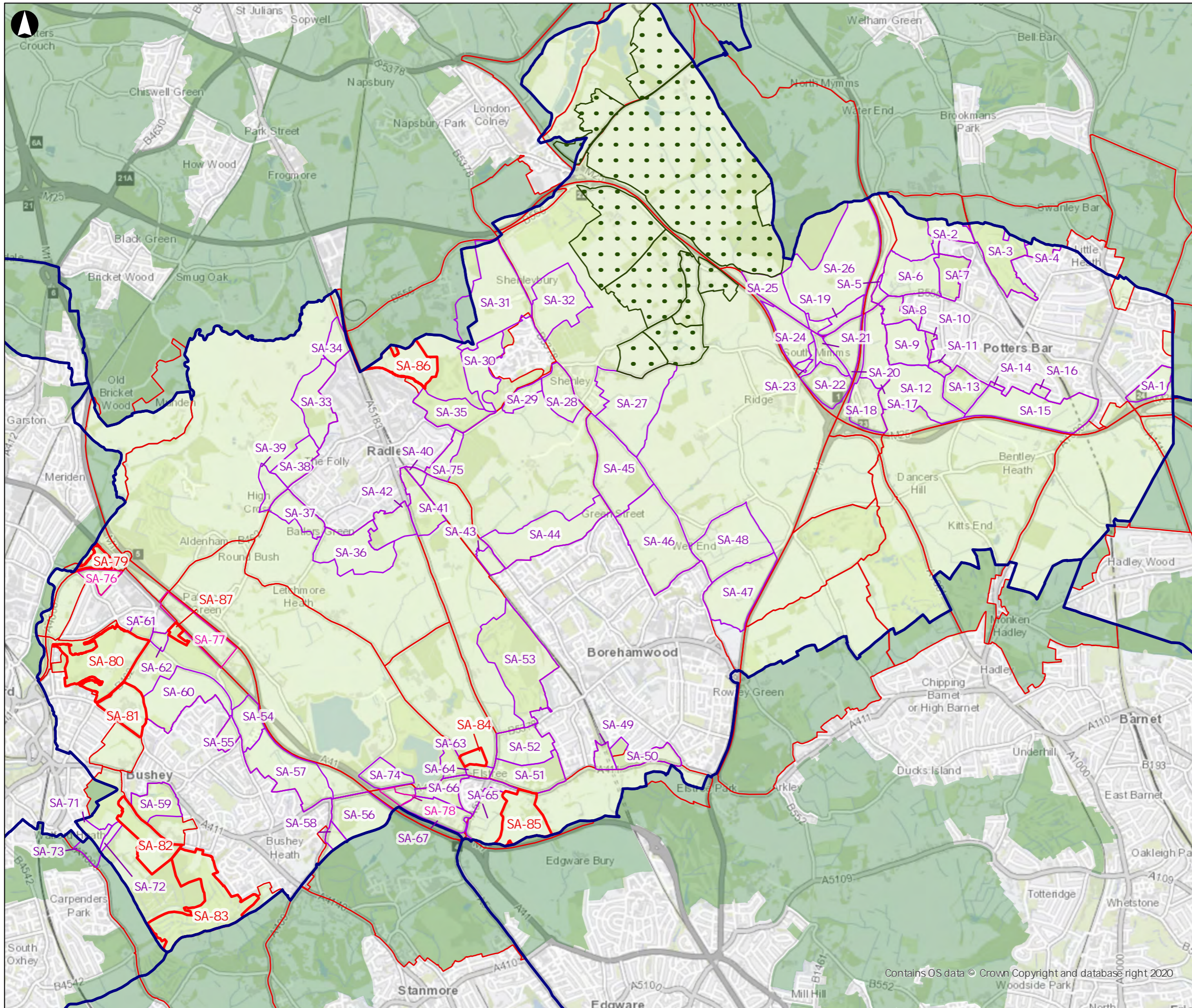
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Project Name
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Stage 2 - Additional Sub-area
Assessment**

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**Figure 4: Additional Sub-Areas for
Assessment**

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Project Number	---
Drawing Number	---
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- Legend**
- Additional Sub-Areas (2024)
 - Additional Sub-areas (2020)
 - Sub-areas from original assessment
 - Garden Village Sites
 - Green Belt Parcels (GBA)
 - Neighbouring Green Belt
 - Hertsmere Green Belt
 - Local Authority boundaries

Coordinate System: British National Grid

Metres

0 500 1,000 2,000

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Figure 5: Combined sub-area map for all Arup Hertsmere Green Belt Assessments (from Stage 1 (2016) to current study (2024))

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3. Findings

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

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

The majority of sub-areas scored 0 against Purpose 1, as shown in Table 1 and Figure 6. The only two exceptions to this (namely, SA-80 and SA-81) are physically and perceptually connected to the large built-up area of Watford, located to the west of the Borough.

The other seven sub-areas are not at the edge of any large built-up areas, either physically or perceptually.

Table 1: Purpose 1 Summary of Scores

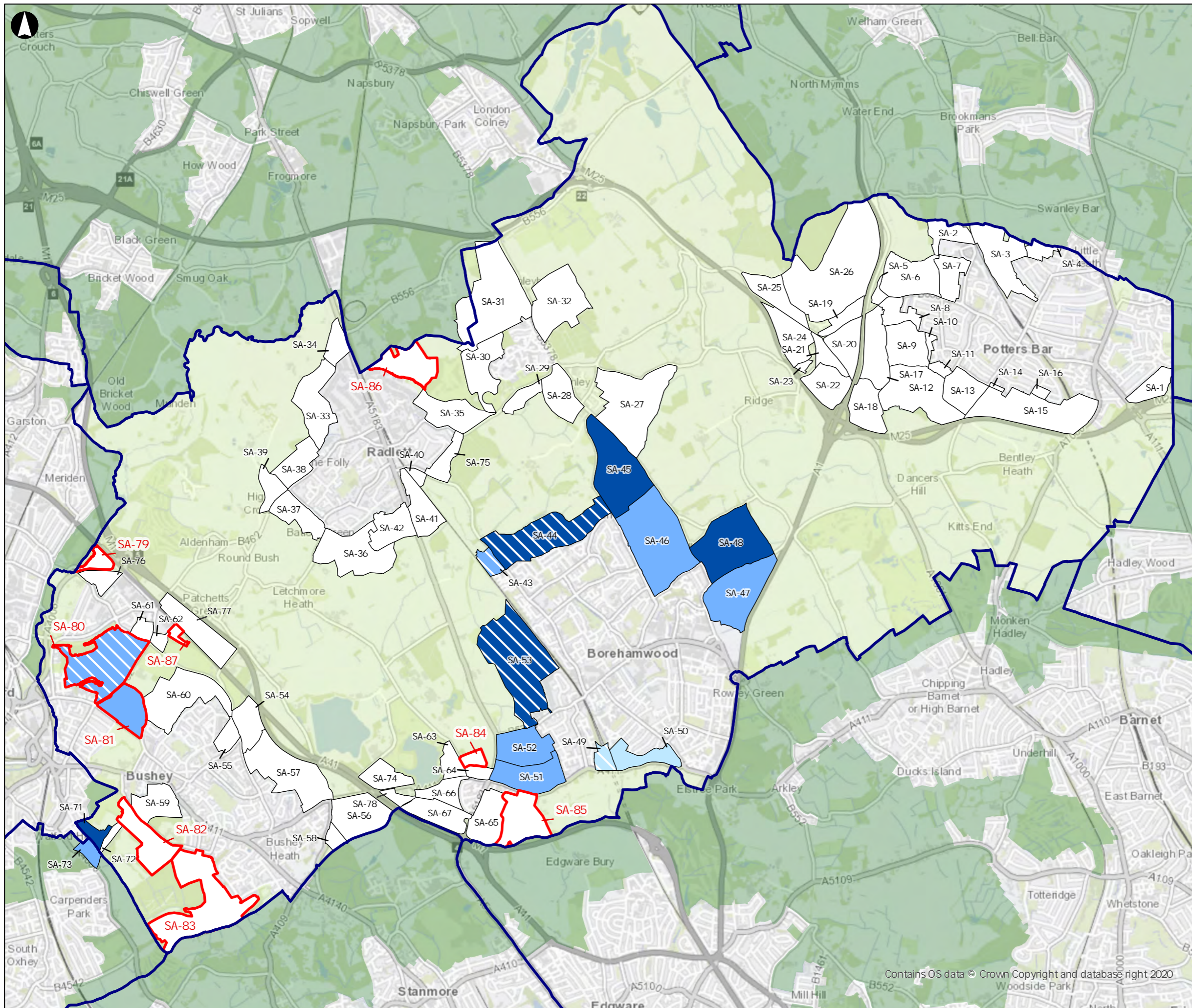
Sub-area	Purpose 1 score
SA-79	0
SA-80	3+
SA-81	3
SA-82	0
SA-83	0
SA-84	0
SA-85	0
SA-86	0
SA-87	0

3.2 Purpose 2 Assessment: To prevent neighbouring towns from merging

The sub-areas vary in strength against the Purpose 2 criteria, as shown in Table 2 and Figure 7, with one sub-area not meeting Purpose 2, one sub-area performing poorly, four sub-areas performing moderately and three performing strongly. This reflects the wider role the sub-areas play in preventing neighbouring settlements from merging, but where there may be scope for some development.

Table 2: Purpose 2 Summary of Scores

Sub-area	Purpose 2 score
SA-79	1
SA-80	5
SA-81	5
SA-82	3
SA-83	5
SA-84	0
SA-85	3
SA-86	3
SA-87	3



Legend

Additional Sub-Areas

Purpose 1b Scores

- 0
- 1
- 1+
- 3
- 3+
- 5
- 5+

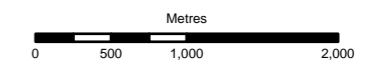
Sub-areas

Neighbouring Green Belt

Hertsmeire Green Belt

Local Authority boundaries

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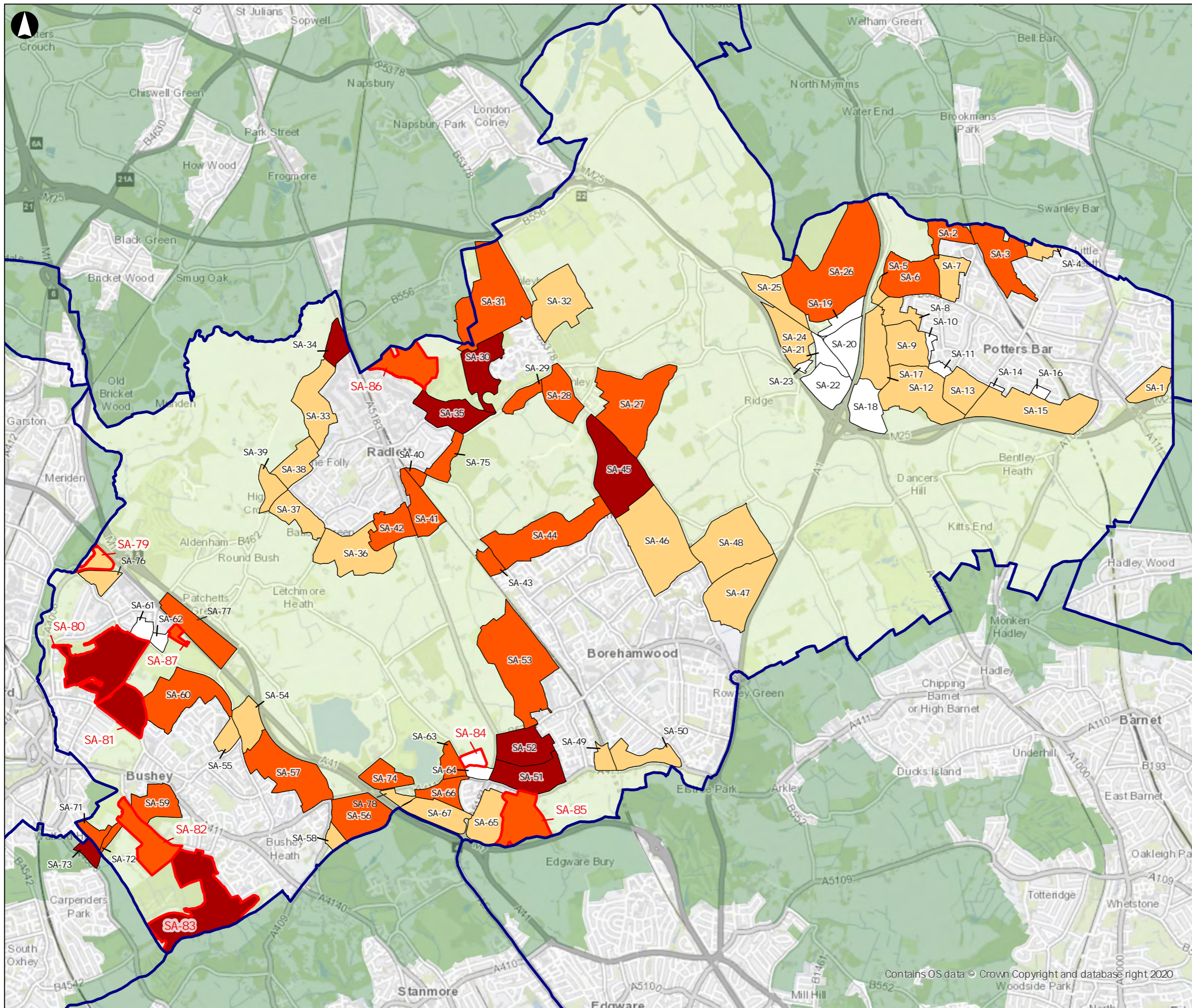
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Assessment**

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Figure 6: Purpose 1 Scores

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Additional Sub-Areas

Purpose 2 Score

0

1

3

5

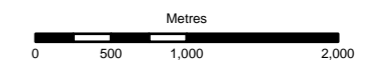
Sub-areas

Neighbouring Green Belt

Hertsmere Green Belt

Local Authority boundaries

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Figure 7: Purpose 2 Scores

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

The majority of sub-areas perform weakly or moderately against this purpose, as shown in Table 3 and Figure 8. This reflects the predominant location of the sub-areas considered in this report, being situated close to towns such as Bushey and South Oxhey, as well as the large built-up areas of Watford and Greater London. These locations display lower level of openness, mixed land uses and urbanising influences. As exceptions, three sub-areas perform strongly against Purpose 3, namely SA-82, SA-84 and SA-86. Each of these sub-areas have a rural feel with limited visual connections to neighbouring built-up areas.

Table 3: Purpose 3 Summary of Scores

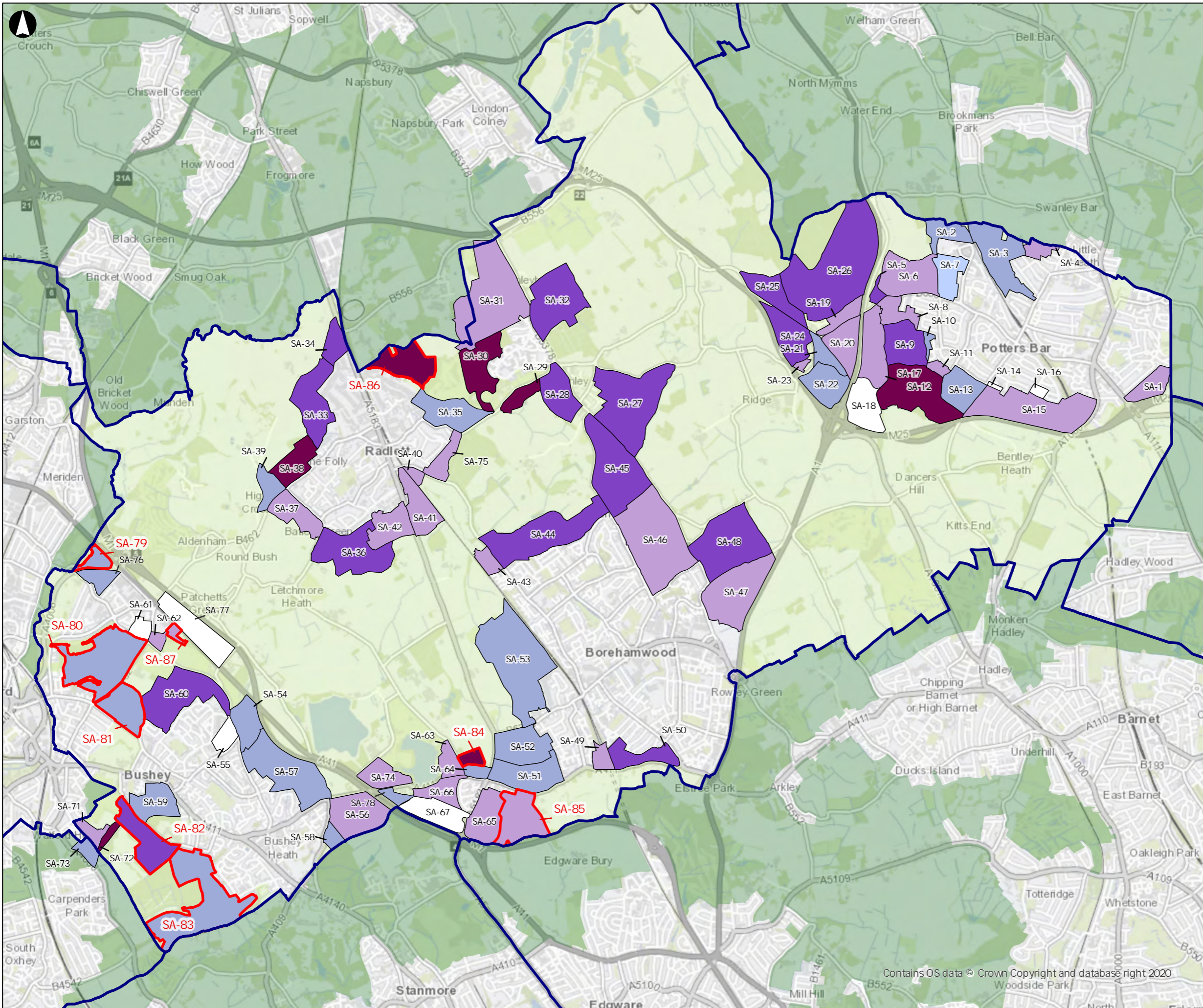
Sub-area	Purpose 3 score
SA-79	2
SA-80	2
SA-81	2
SA-82	4
SA-83	2
SA-84	5
SA-85	3
SA-86	5
SA-87	3

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

The nine sub-areas do not abut either Radlett's historic core or the Conservation Areas in Bushey identified historic settlement core and therefore do not meet this Purpose. All nine sub-areas thus scored 0 against Purpose 4, as shown in Table 4 and Figure 9.

Table 4: Purpose 4 Summary of Scores

Sub-area	Purpose 4 score
SA-79	0
SA-80	0
SA-81	0
SA-82	0
SA-83	0
SA-84	0
SA-85	0
SA-86	0
SA-87	0



Legend

Additional Sub-Areas

Purpose 3 Scores

- 0
- 1
- 2
- 3
- 4
- 5

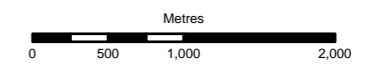
Sub-areas

Neighbouring Green Belt

Hertsmeire Green Belt

Local Authority boundaries

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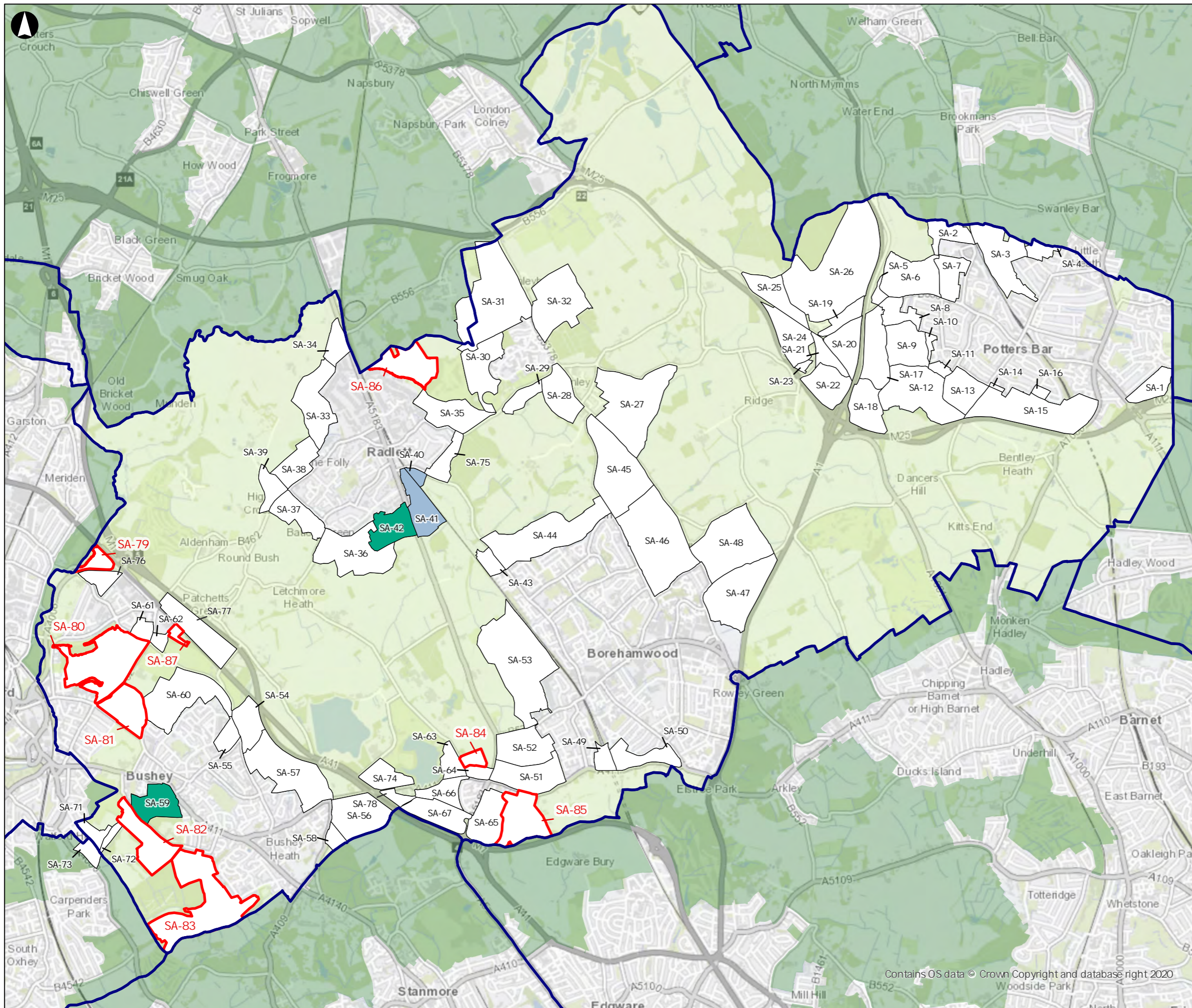
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Figure 8: Purpose 3 Scores

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Additional Sub-Areas

Purpose 4 Scores

0

1

3

5

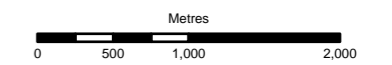
Sub-areas

Neighbouring Green Belt

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Figure 9: Purpose 4 Scores

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3.5 Strategic Green Belt Assessment

Additional qualitative assessment was undertaken to identify the role of sub-areas as part of the wider strategic Green Belt parcels within which they are located (full details found in Appendix A). The assessment scores are shown in Table 5 and Figure 10.

Table 5: Strategic Green Belt Assessment Summary

Sub-area	Contribution to Wider Strategic Green Belt
SA-79	Important
SA-80	Important
SA-81	Important
SA-82	Important
SA-83	Important
SA-84	Less important
SA-85	Important
SA-86	Partly less important
SA-87	Important

3.6 Boundary Consideration

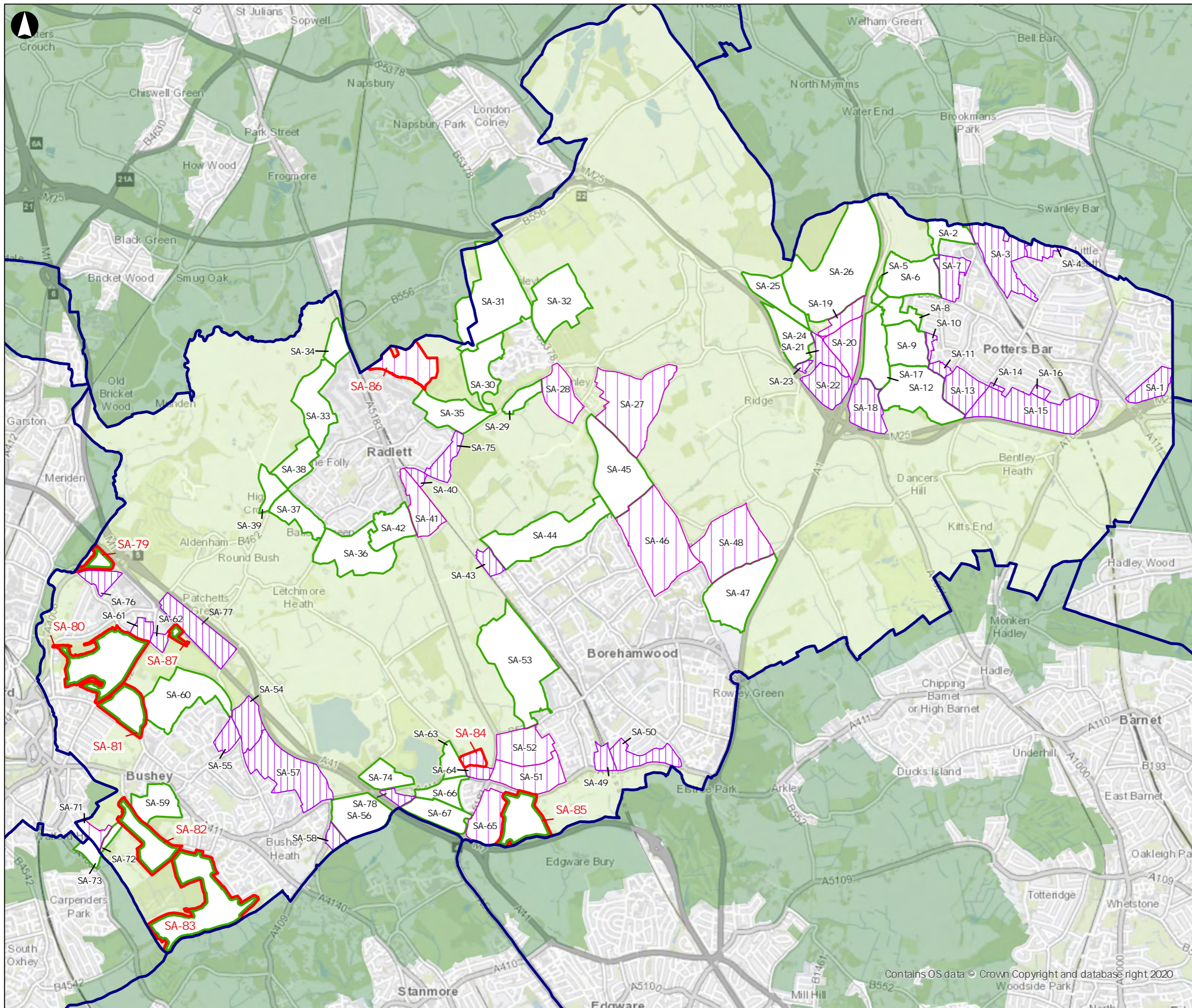
The consideration of the strength of sub-area boundaries identified where removal of a sub-area from the Green Belt could result in boundaries that were stronger, weaker, or comparable to existing. Where boundaries weaknesses were identified, the assessment identified where mitigation might be required,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

3.7 Categorisation

Each sub-area was categorised as to whether the sub-area or combination of subareas or part of sub-area should be considered further. The categories are shown in Table 6 and Figure 11.

Table 6: Summary of Categorisation

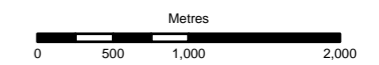
Sub-area	Meets Purpose Assessment Criteria	Contribution to Wider Strategic Green Belt	Categorisation
SA-79	Weakly	Important	Not recommended
SA-80	Strongly	Important	Not recommended
SA-81	Strongly	Important	Not recommended
SA-82	Strongly	Important	Not recommended
SA-83	Strongly	Important	Not recommended
SA-84	Strongly	Less important	Recommended in combination only
SA-85	Moderately	Important	Not recommended
SA-86	Strongly	Partly less important	Partly recommended
SA-87	Moderately	Important	Not recommended



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- Additional Sub-Areas
- Important
- Less important
- Partly less important
- Neighbouring Green Belt
- Hertsmeire Green Belt
- Local Authority boundaries

Coordinate System: British National Grid



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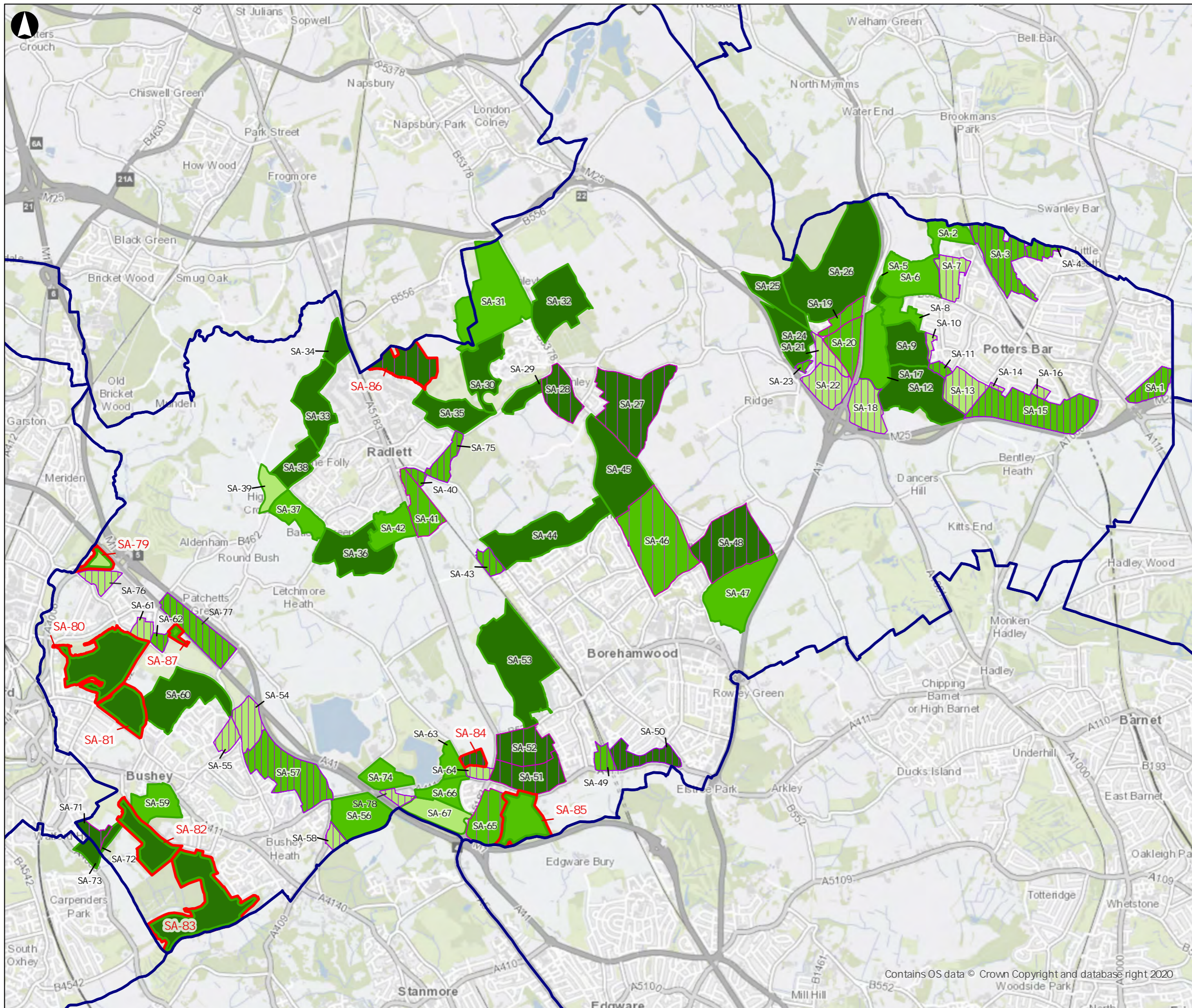
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**Figure 10: Strategic Assessment
Findings**

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- Additional Sub-Areas

Contribution to Wider Strategic Green Belt and Categorisation

- Important
- Less important
- Partly less important

Meets NPPF Purpose Assessment

- Weak
- Moderate
- Strong

- Local Authority boundaries

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Figure 11: Sub-area Categorisation

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4. Recommendations

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

4.1 Sub-area recommendations

Two sub-areas are recommended for further consideration, one in combination and the other in part. It is considered that their removal from the Green Belt is unlikely to result in harm to the wider Green Belt.

4.2 Expanded RC-6 (SA-84 and RC-6 (SA-64 and part of SA-51)) – Land West of Elstree North



Step 4A (NPPF Assessment): SA-84 meets the purposes strongly. The sub-area does not meet Purposes 1, 2 or 4. It meets Purpose 3 strongly, as it comprises an open field with long views to the wider countryside and very limited urbanising influences.

Step 4B (Strategic Assessment): Overall, SA-84 makes a less important contribution to the wider strategic Green Belt. At the more granular level, SA-84 performs similarly to the Green Belt Parcel on Purposes 1 and 4. However, due to its smaller scale, it plays a weaker role against Purpose 2 in protecting the openness of the wider countryside. Due to its rural character, it performs more strongly against Purpose 3, preventing encroachment into an area of unspoilt countryside.

The release of SA-84 in isolation would lead to the irregular sprawl of Elstree and the almost total enclosure of SA-64. However, given SA-64 is recommended for release as part of RC-6 and given it adjoins the recommended inset boundaries for Elstree, its release would round off the settlement. Additionally, it is unlikely to have a significant impact on the performance of the wider strategic Green Belt given the scale of gaps between settlements and existing built form in the adjacent areas.

Step 4C (Consideration of Boundaries): SA-84 does not have any inner Green Belt boundary. Of its outer boundaries, only the west boundary is readily recognisable and likely to be permanent, comprising a public highway.

If released, the sub-area would therefore result in the designation of weak Green Belt boundaries. The north, east and south boundaries would require strengthening to ensure they are readily recognisable and likely to be permanent.

Step 5 (Categorisation): SA-84 meets the purpose assessment criteria strongly and has been assessed to make a less important contribution to the wider strategic Green Belt.

Step 6 (Recommendation): The sub-area is recommended for further consideration in combination with RC-6 and recommended inset Elstree boundaries only.

If released in combination, it is noted that the release of the sub-area would result in the designation of a partly weak Green Belt boundary and would require strengthening to part of the north boundary. It is recommended that sub-area 84 is considered further for release as part of an expanded RC-6.

4.3 RA-18 (Part of SA-86) – Land South of Harper Lodge Farm



Step 4A (NPPF Assessment): SA-86 meets the purposes strongly. The sub-area does not meet Purposes 1 or 4. It meets Purpose 2 moderately, forming a wider part of the gap between Radlett and Shenley. The sub-area meets Purpose 3 strongly, as it predominantly comprises arable fields with very limited urbanising influences.

Step 4B (Strategic Assessment): SA-86 in its entirety makes an important contribution to the wider strategic Green Belt. However, given the proposals to release land immediately to the north in St Albans district, there may be scope to release the western tip of the sub-area without harming the performance of the wider strategic Green Belt.

At the more granular level, SA-86 performs similarly against Purposes 1 and 4. However, due to its scale compared to the Green Belt Parcel, it performs more weakly against Purpose 2. The sub-area performs more strongly than the wider Parcel against Purpose 3 when preventing encroachment into the countryside as there is a general absence of built form.

Step 4C (Consideration of Boundaries): Neither inner and outer boundaries are readily recognisable and likely to be permanent. If released, the sub-area would therefore result in designation of a Green Belt boundary of a weaker strength to the existing boundary. It would require strengthening to ensure it is readily recognisable and likely to be permanent.

Step 5 (Categorisation): The sub-area meets the purpose criteria strongly and makes an important contribution to the wider strategic Green Belt. However, if land is released immediately to the north in St Albans district, the performance of the western tip against the purposes would be weakened and its contribution to the wider strategic Green Belt would be lessened.

Step 6 (Recommendation): The western tip of SA-86 is recommended for further consideration. It is noted that the partial release of the sub-area would result in the designation of a weak Green Belt boundary and would require strengthening. It is recommended that the western tip of sub-area 86 is considered further for release as RA-18.

5. Conclusions

This Study provides an assessment of nine additional sites that were identified in consultation after the completion of the GBA Stage 2 study, the Additional Sites Assessment (2020) and the Inset Village Boundary Assessment (2021).

The nine additional sub-areas were assessed against the NPPF purposes. They are located in proximity to the settlements of Bushey, Elstree and Radlett and exhibit varying characteristics. The majority of sub-areas display an urban or semi-urban character but are predominantly not at the edge of a large built-up area (such as Watford or Greater London), either physically or perceptually. The sub-areas differ in their role in preventing neighbouring towns from merging. Additionally, none of the sub-areas meet Purpose 4, as they do not abut any of identified historic places.

Two sub-areas are recommended for further consideration, one in combination and one in part. It is considered that, if removed from the Green Belt, these areas are unlikely to harm the performance of the wider Green Belt.

The recommendations set out in this Study will not automatically lead to the release of land from in Green Belt. This Study will accompany GBA Stage 2 (2019), the Additional Sites Assessment (2020) and the Inset Village Boundary Assessment (2021) and form part of a suite of Green Belt evidence, which will be used to inform the plan-making process. The Council will need to carefully consider whether, in accordance with the NPPF, there are any exceptional circumstances that justify the alteration of Hertsmere Green Belt boundary through the Local Plan review.

A.1 Site Pro Formas

Sub-area	SA-79	
Area (ha)	8.09	
Green Belt Parcel (GBA)	22	



Description	<p>The sub-area is located to the north-west of Bushey and to the north-east of Watford. It is bounded by A4008 (Stephenson Way) to the south, Flood Zone 3 and the Hertsmere Borough/ Watford Borough administrative boundary to the north-west, A41 (North Western Avenue) to the north-east and the Berrygrove Interchange roundabout to the east.</p> <p>The sub-area does not directly adjoin a settlement.</p>
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Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas	The sub-area is not at the edge of a distinct large built-up area in physical terms. Although it is relatively close to the eastern edge of Watford, the sub-area is also not at the edge of a distinct large built-up area in perceptual terms, as the intervening vegetation provide a visual buffer and prevent direct views between the sub-area and Watford.	Fail
	(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	N/A	0

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	The sub-area forms a less essential part of a wider gap between North Bushey and the large built-up-area of Watford, which is of sufficient scale that its removal would not result in physical or perceptual coalescence. Due to its small scale, and enclosed nature, it makes no discernible contribution to separation between settlements.	1
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Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>Approximately 9% of the sub-area is covered by built form. The sub-area has a varied character and is partially sub-divided by Otterspool Lane and Berry Grove Lane.</p> <p>To the north, it predominantly comprises a dense patch of woodland (namely, Wildwoods). A Public Right of Way (PRoW) traverses through the woodland, adjacent to a prominent sloping highway verge, creating a strong sense of visual enclosure. From both ends of the PRoW, views of highway bridges are prominent (particularly Berrygrove Interchange to the south-east), creating urbanising influences.</p> <p>To the south, there are a series of managed plots: one containing a utility substation; one with a sizeable two-storey dwelling accommodating a B&B; and one with a field in equestrian use. While each plot comprises open grassed land, due to a mature treeline along the south boundary, there is a strong sense of visual enclosure, limiting visual links and connection to the wider countryside.</p> <p>To the west, there is a long narrow section with an agricultural field and its associated boundary, lined with relatively dense trees and scrub vegetation.</p> <p>Overall, the sub-area has a semi-urban character.</p>	2
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Purpose 4 Assessment

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

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	22	0	5	3	0
Assessment of wider impact	<p>The sub-area lies within Green Belt Parcel (GBA) 22, which scored strongly overall. It was identified that Parcel 22 failed against Purpose 1, performed strongly against Purpose 2 and moderately against Purpose 3. Parcel 22 did not perform against Purpose 4. The Parcel was identified as playing an important role in maintaining the very narrow gap between Watford and North Bushey.</p> <p>At the more granular level, the sub-area performs similarly to the Green Belt Parcel in relation to Purpose 1 and 4. However, due to its enclosed nature, smaller scale and urbanising influences, it plays a lesser role against Purpose 2 and 3. It forms a less essential part of the gap between Watford and North Bushey and has a largely semi-urban character.</p> <p>SA-79 adjoins SA-76, as assessed in the 2020 Additional Sites Assessment, to the south. The removal of SA-79 in isolation would leave a hole in the Green Belt. It would reduce the scale of the gap by around a third between Watford and North Bushey (Purpose 2). This gap is already sensitive due to existing development to the west. For clarity, the existing development lies within Watford Green Belt and has not been allocated for release from the Green Belt in the Watford Local Plan (adopted in 2022).</p> <p>In-combination, the release of SA-79 and SA-76 would lead to significant encroachment of the countryside to the north-west of Bushey in physical terms. It would lead to a significant reduction in the separation of the gap between Watford and North Bushey and could contribute to the physical coalescence of these settlements.</p> <p>Overall, the sub-area plays an important role in the wider strategic green belt. In isolation, its contribution to the essential gap between Watford and North Bushey is limited by its small scale and enclosed nature. However, its release in isolation would undermine the integrity of the Green Belt and in combination would significantly reduce the gap between Watford and North Bushey.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The sub-area does not have any inner boundaries as it does not adjoin Watford or North Bushey.</p> <p>The outer boundaries of SA-79 are predominantly readily recognisable and likely to be permanent, comprising:</p> <ul style="list-style-type: none"> - the Berrygrove Interchange roundabout to the east; - A4008/ Stephenson Way to the south; - Flood Zone 3 and the Hertsmere Borough/ Watford Borough administrative boundary to the west; and - A41/ North Western Avenue to the north. <p>If released, it would result in the designation of a new Green Belt boundary formed of readily recognisable features that are likely to be permanent.</p>
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Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria weakly and makes an important contribution to the wider strategic Green Belt. Not recommended.
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Site Photos



Photograph 1: View of SA-79 facing east towards eastern boundary, showing view of PRow and adjacent woodland with Berry Grove Lane and the highway bridges of Berrygrove Interchange beyond.



Photograph 2: View of SA-79 facing north from Berry Grove Lane, showing view of the dense patch of woodland within the sub-area.

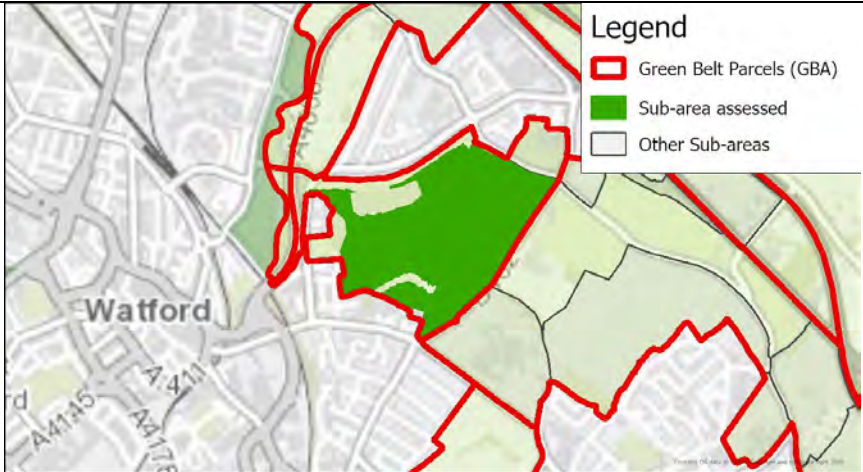
Site Photos



Photograph 3: View of SA-79 facing south from Berry Grove Lane, showing view of equestrian area and dwelling that accommodates B&B.



Photograph 4: View of facing south-west from Berry Grove Lane, showing view of utility sub-station.

Sub-area	SA-80	 <p>Legend █ Green Belt Parcels (GBA) █ Sub-area assessed Other Sub-areas</p>
Area (ha)	63.46	
Green Belt Parcel (GBA)	15	



Description	<p>The sub-area is located in the gap between the two existing areas of built form within North Bushey ward. It is bounded by the backs of residential properties, Flood Zone 3, edge of a park homes site and commercial premises and Bushey Hall Drive to the south, backs of residential properties, a Local Nature Reserve and a very short section of Park Avenue to the west, Flood Zone 3 and a Local Wildlife Site comprising ancient woodland to the north, Flood Zone 3 and Bushey Mill Lane to the north-east and B462 (Aldenham Road) to the south-east.</p> <p>The sub-area directly adjoins Bushey to the north-east, south and west.</p>
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Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas	The sub-area is physically at the edge of North Bushey, which immediately abuts the large built-up area of Watford.	Pass
	(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>The sub-area is physically and perceptually connected to the large built-up area of Watford, preventing its outwards sprawl into open land. The outer boundary of the sub-area consists of a permanent boundary to the south-east where it is bounded by B462 (Aldenhams Road), which is likely to restrict the scale of growth and regularize development form.</p> <p>The boundary between the sub-area and North Bushey / Watford built-up area is largely bounded by features lacking in durability and / or not necessarily readily recognisable - comprising an irregular line of residential properties and back gardens, as well as a park home site and edge of Flood Zone 3 . The Green Belt is an important barrier to sprawl.</p>	3+

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	The sub-area forms an essential gap between Watford and North Bushey, preventing development that would significantly visually and physically reduce the distance between these settlements, which would result in the merging of the settlements.	5
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Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>Approximately 7% of the sub-area is covered by built form. The built form is concentrated along the east edge and centre of the sub-area, comprising local roads, Bushey Grove Leisure Centre and associated playing courts and car parking; Queens' School and The Purcell School and associated parking; Little Acorns Montessori School; and assorted commercial as well as residential development. The remaining majority of the sub-area is characterized by a golf course, interspersed with mature trees and playing fields edge with dense mature tree lines. All of these uses serve to create an urban managed character. There are also three relatively small but dense wooded areas to the west and north of the sub-area. The majority of the sub-area has an open character, however there is little connectivity between the sub-area and the wider countryside.</p> <p>Overall, the sub-area has a semi-urban character.</p>	2
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Purpose 4 Assessment

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

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	15	3+	5	2	0
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (15) which was identified as performing moderately against Purpose 1, preventing the outward sprawl of Watford. The parcel performed strongly against Purpose 2 for forming an essential gap between North Bushey and Watford. The parcel is physically and visually severed from the wider countryside and has been subject to substantial encroachment from development, so performs weakly against Purpose 3. It does not meet the assessment criteria for Purpose 4.</p> <p>At the more granular level, the SA-80 performs similarly to the wider parcel against Purpose 1, preventing the outward sprawl of Watford, and also against Purpose 2 as an essential gap between North Bushey and Watford. The sub-area also performs similarly to the wider parcel against Purpose 3, with built form interspersed with urban managed landscapes. In line with the wider parcel the sub-area does not meet Purpose 4.</p> <p>SA-80 directly adjoins SA-81 to the south-west and SA-61 to the north-east. Built form already exists within all three sub-areas and so the removal of SA-81 is unlikely to significantly reduce the neighbouring sub-areas contribution to Purpose 3 given the existing urbanising influences, as well as combined with the existing tree lines that exist between the sub-areas.</p> <p>In combination, the release of SA-80 with SA-81 and/or SA-61 would have a significant impact on the performance of the strategic Green Belt. The removal would lead to the substantial physical and visual coalescence of Watford, North Bushey, and Bushey Heath/ Bushey Village. Overall, the release of SA-80 would have a significant impact to the performance of the wider strategic Green Belt. Whilst the sub-area is characterised by existing managed land uses, it does play an important role in preventing the sprawl of Watford and preventing the complete coalescence of Watford and North Bushey.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The inner boundaries of the sub-area are predominantly comprised of relatively weak boundary features which are less readily recognisable, comprising:</p> <ul style="list-style-type: none"> - Backs of residential and commercial properties, edge of Flood Zone 2, a park home and Bushey Hall Drive to the south; - A Local Nature Reserve and a very short section of the A4009 (Stephenson Way) to the west; - Edge of Flood Zone 3, a Local Wildlife Site and Bushey Mill Lane to the north-east. <p>The majority of the outer boundaries of SA-80 are readily recognisable and likely to be permanent, albeit there are weaker features too. The outer boundaries comprise:</p> <ul style="list-style-type: none"> - Bushey Mill Lane to the north-east; - B462 (Aldenham Road) to the south-east. <p>If SA-80 was released, it would result in the designation of a stronger Green Belt boundary than the existing inner Green Belt boundary.</p>
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Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria strongly and makes an important contribution to the wider strategic Green Belt. Not recommended.
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Site Photos



Photograph 1: View of SA-80 facing north-west towards residential development in the centre of the site



Photograph 2: View of SA-80 facing north-east from the south of the site, showing view of car park associated with leisure centre.

Site Photos



Photograph 3: View of SA-80 facing south-east towards the golf course located within the site.



Photograph 4: View of SA-80 from Aldenham Road boundary, facing north towards The Purcell School and associated playing fields.

Sub-area	SA-81	
Area (ha)	26.69	
Green Belt Parcel (GBA)	6	

Legend

- █ Green Belt Parcels (GBA)
- █ Sub-area assessed
- Other Sub-areas



Description	<p>The sub-area is located in the gap between the two existing areas of built form within North Bushey ward; and in the gap between the built form within North Bushey and Bushey St James wards to the south-east. It is bounded by The Avenue to the south-west, Aldenham Road (B462) to the north-west, a mature tree line to the north-east and east, Finch Lane to the south- east.</p> <p>The sub-area directly adjoins Bushey to the south-east and south-west.</p>
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Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas	The sub-area is physically at the edge of North Bushey, which immediately abuts the large built-up area of Watford.	PASS
	(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>The sub-area is physically and perceptually connected to the large built-up area of Watford, preventing its outwards sprawl into open land. The outer boundary of the sub-area comprises softer, natural features in the north-east and east where there is an access road leading on to a footpath with a mature treeline on either side. It is therefore unlikely that these features would restrict the scale of growth or assist in regularizing development form.</p> <p>The boundary between the sub-area and the Watford built-up area comprises The Avenue. It is therefore considered that the Green Belt provides an additional barrier to sprawl.</p>	3

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	The sub-area forms the entire gap between Watford / North Bushey and Bushey Heath / Bushey Village, preventing development that would significantly visually and physically reduce the distance between these settlements, which would result in the merging of the settlements.	5
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Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>Approximately 12% of the sub-area is covered by built form. This comprises local roads, residential development concentrated in the centre and to the south-east of the sub-area, and commercial use to the north-east of the sub-area. Landscaped gardens, areas of hardstanding, paved parking and outbuildings all further contribute to the urban feel of the sub-area. All around the central residential area are open grass fields with dispersed tree lines along the edges, with a large degree of intervisibility between the built form within and adjacent to the sub-area. The northern portion of the sub-area has a greater sense of containment due to the mature woodland boundary. There are limited view to surrounding countryside.</p> <p>Overall, the sub-area has a semi-urban character.</p>	2
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Purpose 4 Assessment

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

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	6	3	5	3	0
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (6) which was identified as performing moderately against Purpose 1 as it is connected to the large built-up area of Watford and against Purpose 3 as it is characterised by pastoral fields and long views. It performed particularly strongly against Purpose 2 for maintaining the narrow gaps between Watford, Bushey Heath/Bushey Village, North Bushey and Elstree. It did not meet the assessment criteria for Purpose 4. At the more granular level, SA-81 performs similarly when compared to the wider parcel against Purpose 1, preventing the outward sprawl of Watford. The sub-area also performs similarly to the wider parcel against Purpose 2 as an essential gap to prevent the merging of Watford /North Bushey and Bushey. It performs less strongly at assisting in safeguarding the countryside from encroachment due to the presence of built-form and its connection with the settlement edge meaning it has a semi-urban character. The sub-area did not meet the assessment criteria for Purpose 4.</p> <p>The sub-area directly adjoins SA-80 to the west and SA-60 to the east. While built form already exists within SA-81 and SA-80, SA-60 performs strongly against Purpose 3 due to its rural feel. As a result, the removal of SA-81 is likely to significantly reduce the contribution of SA-60 to Purpose 3.</p> <p>In combination, the release of SA-80 and SA-81 would have a significant impact on the performance of the strategic Green Belt. The removal would lead to the substantial physical and visual coalescence of Watford, North Bushey, and Bushey Heath / Bushey Village.</p> <p>In combination, the release of SA-82 and SA-60 is likely to alter the performance of the wider Green Belt. It would lead to encroachment of open countryside between Bushey Heath / Bushey, Watford and North Bushey, significantly reducing the separation of the gap between these settlements.</p> <p>Overall, the release of SA-81 would have a significant impact on the performance of the wider strategic Green Belt. Whilst the sub-area does not play a prominent role in preventing encroachment into the wider countryside as a result of its existing development and managed land uses, it does play an important role in preventing the sprawl of Watford and preventing the coalescence of Watford and Bushey.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The inner boundaries comprising The Avenue and Finch Lane readily recognisable and likely to be permanent features.</p> <p>The outer boundaries in the west and south comprising The Avenue and Aldenham Road are readily recognisable and are likely permanent. The outer boundary in the east is less permanent comprising an access road leading on to a footpath and mature tree.</p> <p>If released, the sub-area would therefore result in the designation of a partially weaker Green Belt boundary than the existing inner Green Belt boundary. The boundary to the east would require strengthening to ensure it is readily recognisable and likely to be permanent.</p>
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Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria strongly and makes an important contribution to the wider strategic Green Belt. Not recommended.
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Site Photos



Photograph 1: View of SA-81 facing east towards residential development in the centre of the site.



Photograph 2: View of SA-81 facing south, showing view of lawned areas.

Site Photos



Photograph 3: View of SA-81 facing west towards residential development and tennis courts.

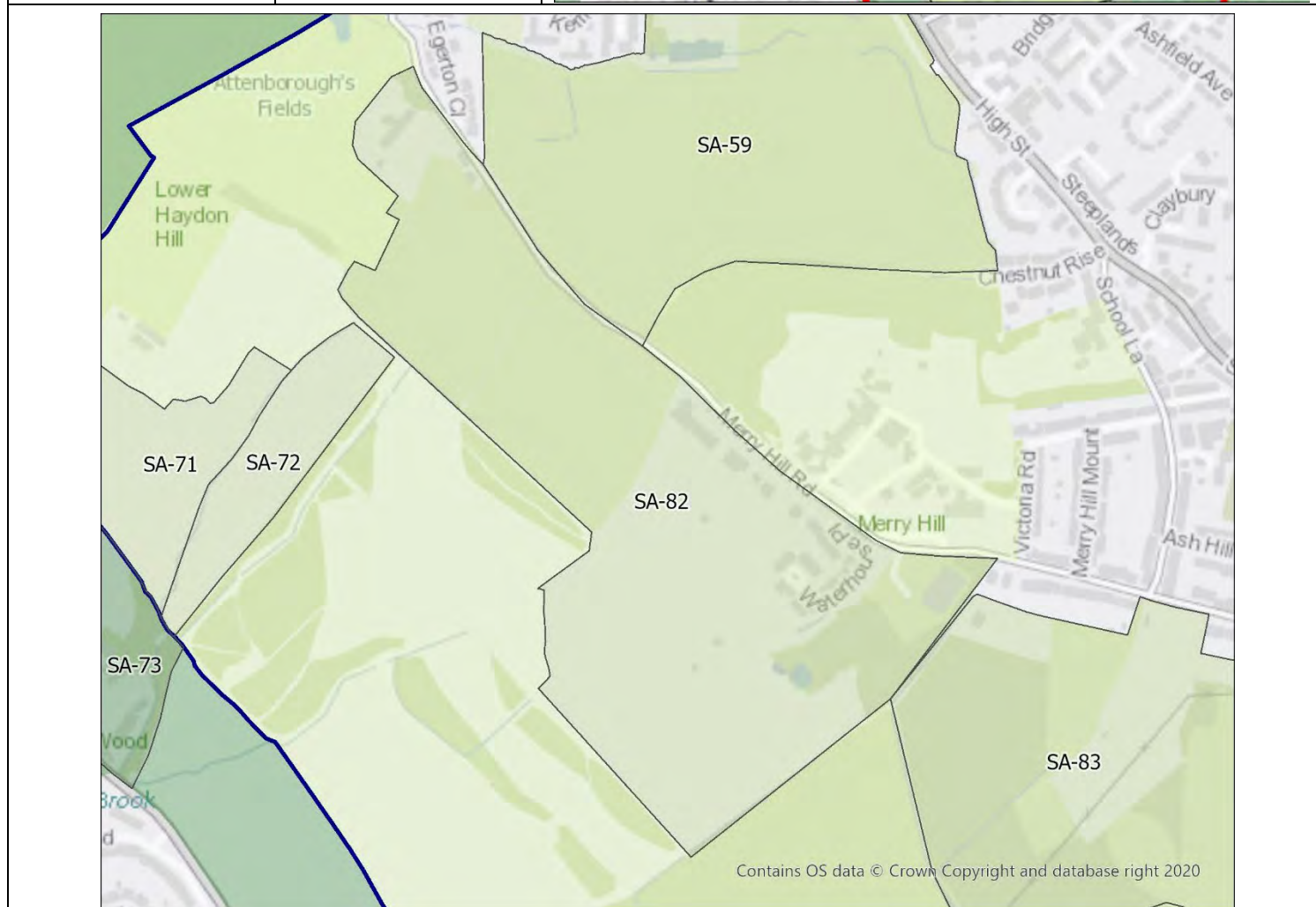


Photograph 4: View of SA-81 facing west towards additional residential development.

Sub-area	SA-82	
Area (ha)	31.92	
Green Belt Parcel (GBA)	1	

Legend

- █ Green Belt Parcels (GBA)
- █ Sub-area assessed
- Other Sub-areas



Description	<p>The sub-area is located to the south-west of Bushey Heath / Bushey Village, to the south-east of Watford, to the north-east of South Oxhey and to the north of Greater London. It is bounded by mature tree lines along field boundaries to the south-west, west and north-west; Merry Hill Road to the north-east and east; and a mature tree line and hedgerow to the south-east.</p> <p>The sub-area directly adjoins Bushey Village to the north-east and Bushey Heath to the south-east, albeit only for a short section of each of these boundaries.</p>
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Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

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

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	<p>The sub-area forms a wider part of the gap between Bushey Heath / Bushey Village and South Oxhey as well as between Bushey Heath / Bushey Village and Watford, maintaining the overall openness and scale of these gaps. There may be scope for some development, but the overall openness and scale of the gap is important to restricting merging. Visual separation is maintained between the settlements as a result of topography and mature trees and vegetation which interrupt views.</p> <p>The sub-area also forms a small part of the gap between Watford and Greater London. However, the gap is of sufficient scale that the settlements are unlikely to merge.</p>	3
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Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>Approximately 4% of the sub-area is covered by built form. Much of the sub-area has a strong sense of rurality, predominantly comprising agricultural fields and areas of woodland to the south-east.</p> <p>There are some urbanising influences including a sizeable school campus and small group of residential properties to the east and a non-residential building to the far north-west corner of the sub-area. These buildings are predominantly screened from the wider sub-area and countryside by mature trees and hedgerows.</p> <p>Despite the urbanising features, the sub-area has a strong unspoilt rural character, playing an important role in preventing encroachment into the countryside due to the general absence of built development and the overall scale and enclosure of the sub-area by mature hedgerows and tree lines.</p> <p>Overall, the sub-area has an unspoilt rural character.</p>	4
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Purpose 4 Assessment

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

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
		1	5+	5	3
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (1) which was identified as performing strongly against Purpose 1, due to being contiguous with the large built-up areas of Greater London and Watford, preventing their outward sprawl, and also performs strongly against Purpose 2, forming the essential gap between Watford and Bushey. It performs moderately against Purpose 3 as although the majority of the sub-area is characterised by a strong openness, existing built-form and managed land uses diminish the sense of rurality. The wider Parcel only performs a limited contribution to the broader setting on the historic core (Purpose 4). At the more granular level, SA-82 does not meet Purpose 1 or Purpose 4 but performs similarly to the wider Parcel against Purpose 3, as a result of its strong sense of rurality and limited urbanizing influences. The sub-area performs less strongly against Purpose 2 due to its smaller scale as it forms only part of the gaps between Bushey and Watford; and Watford and Greater London. and.</p> <p>SA-82 adjoins SA-72 to the south-west, SA-59 to the north-east, and SA-83 to the south-east. The release of SA-82 in isolation would impact the performance of surrounding sub-areas against Purpose 3. In respect of Purpose 2, it would reduce the performance of SA-59 as the sub-area would be enclosed on three sides and isolated from the wider Green Belt. While SA-72 and SA-83 would become more significant in preventing the merger of Watford and Bushey, and Watford and London respectively.</p> <p>In combination, the release of SA-82 with SA-59, SA-72 and /or SA-83 is likely to alter the performance of the wider Green Belt. It would lead to significant encroachment into a wider swathe of open countryside between Bushey Heath / Bushey Village, Watford, South Oxhey and Greater London, significantly reducing the separation of the gap between these settlements and contributing to their physical coalescence.</p> <p>Overall, the release of SA-82 in either isolation or combination would have a significant impact to the performance of the wider strategic Green Belt. It plays an important role in preventing the coalescence of Bushey Heath / Bushey Village, South Oxhey, Watford and London.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The short sections of inner boundary are readily recognisable and likely to be permanent, comprising Merry Hill Road.</p> <p>The outer boundary of SA-82 to the north-east is readily recognisable and likely to be permanent comprising Merry Hill Road. However, the outer boundary to the south-east, south-west and west is weaker, comprising mature treelines along field boundaries.</p> <p>Therefore, if SA-79 was released, it would result in the designation of a weak Green Belt boundary. The boundary to the south-west and west would require strengthening to ensure it is readily recognisable and likely to be permanent.</p>
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Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria strongly and makes an important contribution to the wider strategic Green Belt. Not recommended.
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Site Photos



Photograph 1: View of SA-82 from Public Right of Way, showing middle section of south-east boundary (on right of photograph) with mature trees and hedgerows and adjacency to wider countryside.



Photograph 2: View of SA-82 from Public Right of Way, showing west section of south-east boundary with mature trees and gated farm track.

Site Photos



Photograph 3: View of SA-82 from Public Right of Way, showing north-east corner with boundary vegetation and a sports centre building belonging to the school campus.

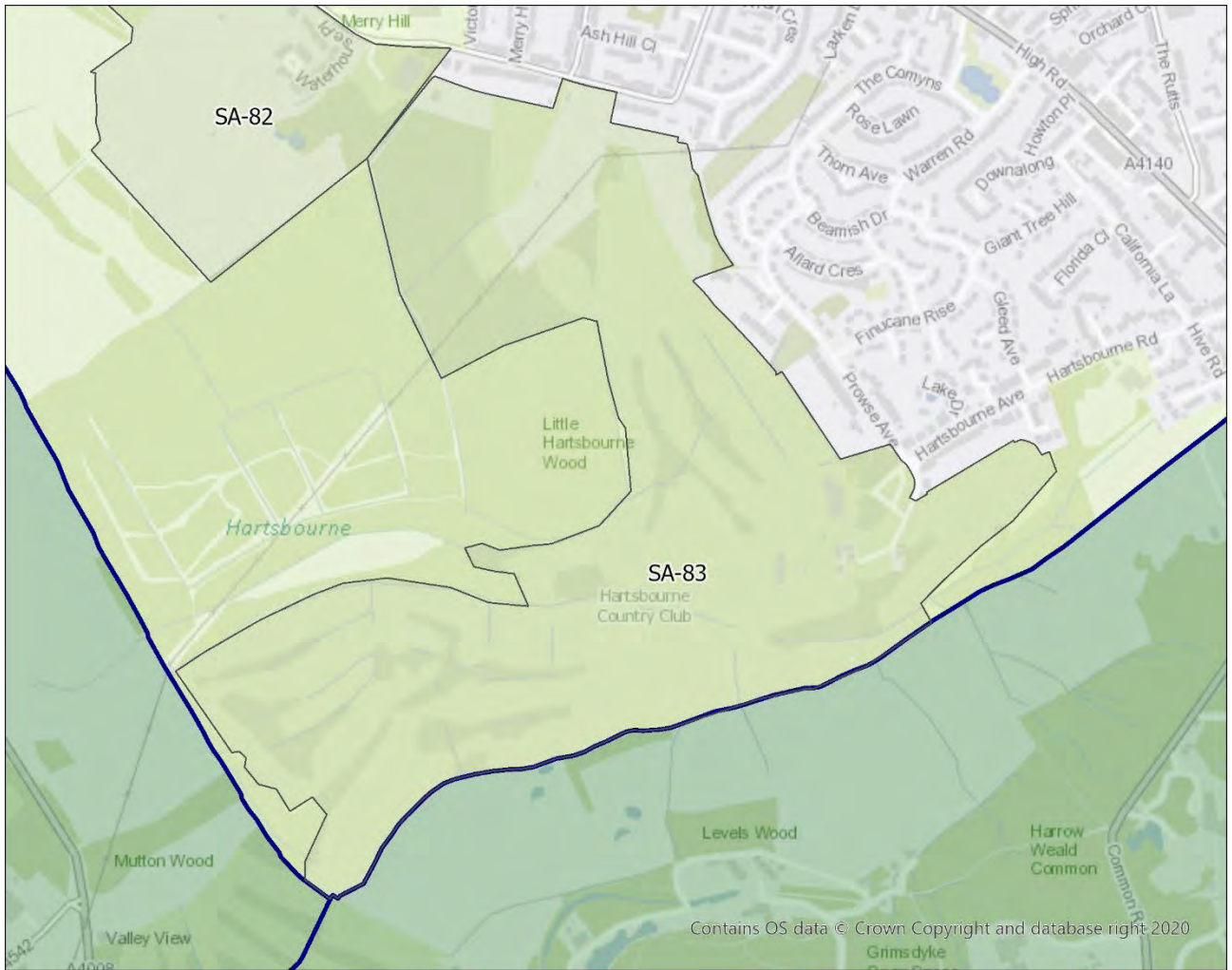


Photograph 4: View of SA-82 from Public Right of Way, showing north-west corner with open field and a single non-residential building on the far side, with the wider countryside beyond.

Sub-area	SA-83	
Area (ha)	77.98	
Green Belt Parcel (GBA)	1	

Legend

- █ Green Belt Parcels (GBA)
- █ Sub-area assessed
- █ Other Sub-areas



Description	<p>The sub-area is located to the south-west of Bushey Heath / Bushey Village, to the south-east of Watford, to the north-east of South Oxhey and north of Greater London. It is bounded by mature treelines to the south and west, an intermittent boundary of backs of residential properties along Merry Hill Road to the north and Whomsoever Lane, backs of residential properties along Prowse Avenue and Hartsbourne Road, Prowse Avenue and Hartsbourne Close to the east.</p> <p>The sub-area directly adjoins Bushey Heath to the east.</p>
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Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

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

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	The sub-area forms almost the entire gap between Bushey Heath and South Oxhey, preventing development that would significantly reduce the physical distance between these settlements. Additionally, the sub-area forms a less essential gap between Watford and Greater London.	5
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Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>Approximately 1% of the sub-area is covered by built form. The majority of the sub-area is formed of a golf course and country club, with an associated cluster of buildings, access roads and areas of hardstanding to the south-east. The maintained nature of the golf course contributes to a more urban, managed feel. It is also predominantly visually enclosed due to mature tree lines along much the sub-area boundaries, limiting visual links to the wider countryside.</p> <p>A small part of the sub-area, to the north / north-west, lies outside the golf course. It predominantly comprises agricultural fields and dispersed trees and vegetation, as well as a single barn and Public Right of Way (PRoW). From the PRoW, there are some visual connections to the wider countryside, due to rising topography. Additionally, this part of the sub-area comprises a private cul-de-sac road (School Lane), providing access to two areas of allotments, which contribute to a more urban, managed feel. There are also further urbanising influences, including landscaped residential gardens, powerlines traversing east to west across the sub-area and direct visual links with the residential properties on Merry Hill Road on the north boundary.</p> <p>Overall, the sub-area has a semi-urban character.</p>	2
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Purpose 4 Assessment

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

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
		1	5+	5	3
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (1) which was identified as performing strongly against Purpose 1, due to being contiguous with the large built-up areas of Greater London and Watford, preventing their outward sprawl, and also performs strongly against Purpose 2, forming the essential gap between Watford and Bushey. It performs moderately against Purpose 3 as although the majority of the sub-area is characterised by a strong openness, existing built-form and managed land uses diminish the sense of rurality. The wider Parcel only performs a limited contribution to the broader setting on the historic core (Purpose 4). At the more granular level, SA-83 does not meet Purpose 1 or Purpose 4 but performs similarly to the wider Parcel against Purpose 2, as a result of forming almost the entire gap between Bushey Heath / Bushey Village and South Oxhey. The sub-area performs less strongly against Purpose 3 due to the higher concentration of managed land uses and presence of other urbanising influences.</p> <p>SA-83 adjoins SA-82 to the north-west. The release of SA-83 in isolation would weaken the performance of SA-82 against Purpose 3 and increase the significance of SA-82 in preventing the merger of Watford and Greater London.</p> <p>In combination, the release of SA-83 and SA-82 is likely to alter the performance of the wider Green Belt. It would lead to encroachment of the countryside in physical terms, significantly reducing the gap between both Bushey Heath / Bushey, South Oxhey, Watford and Greater London and contributing to the physical coalescence of these settlements.</p> <p>Overall, the release of SA-83 would have a significant impact to the performance of the wider strategic Green Belt. It plays an important role in preventing the coalescence of Bushey Heath / Bushey Village, South Oxhey, Watford and Greater London.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The north and east sections of the inner boundary are predominantly readily recognisable and likely to be permanent, comprising backs of residential properties, Prowse Avenue and Hartsbourne Close.</p> <p>However, the outer boundary to the south and west is weaker, comprising mature treelines along field boundaries</p> <p>Therefore, if SA-83 was released, it would result in the designation of a weaker Green Belt boundary than the existing inner Green Belt boundary. The boundaries to the south and west would need strengthening.</p>
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Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria strongly and makes an important contribution to the wider strategic Green Belt. Not recommended.
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Site Photos



Photograph 1: View of SA-83 from Public Right of Way looking east, showing north-west part of sub-area with mature trees, a barn and backs of residential properties on Merry Hill Road.



Photograph 2: View of SA-83 from Merry Hill Road, showing private cul-de-sac road (School Lane) with gated entrance to allotments and adjacent built development.

Site Photos



Photograph 3: View of SA-83 from PRow looking south, showing mature trees and wider views into open countryside.

Sub-area	SA-84	
Area (ha)	6.1	
Green Belt Parcel (GBA)	10	



Description	<p>The sub-area is located to the north of Elstree. It is bounded by fragmented treeline and hedgerow along the edge of a historic park and garden to the north and east, mature treeline and back of residential properties to the south and Aldenham Road to the west.</p> <p>The sub-area does not directly adjoin an inset settlement, although it is adjacent to the washed over part of Elstree.</p>
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Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

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

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	As a result of its small scale in the context of the overall gaps between Elstree and Radlett; and Borehamwood and Bushey, it is considered that the sub-area does not provide a discernible contribution to the separation of settlements.	0
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Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>There is no built form within the sub-area. The sub-area comprises a grassed open field, with long views to the wider countryside from the east of the sub-area, aiding by the sloping topography from west to east. There is a limited sense of containment.</p> <p>The sub-area is bordered by a small number of adjoining residential properties to the north-west and south-west which have a slight urbanising influence.</p> <p>Overall, the sub-area has a strong unspoilt character.</p>	5
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Purpose 4 Assessment

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

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	10	0	3	3	0
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (10), which does not meet Purpose 1 or Purpose 4. Parcel 10 scored moderately against Purpose 2, forming part of the wider gap between Elstree, Borehamwood, Radlett, and Bushey Heath/Bushey Village, and moderately against Purpose 3, characterised by predominantly open land and piecemeal low density development, as well as a largely rural character. It was noted that the southern part of Parcel 10 makes a lesser contribution to Purpose 2.</p> <p>At the more granular level, the sub-area does not meet Purposes 1 or 4 in line with the wider parcel. It scores more weakly against Purpose 2 than the wider Parcel as a result of its small scale in the context of overall gaps between settlements. The sub-area performs more strongly than the wider Green Belt parcel against Purpose 3 preventing encroachment into an area of unspoilt countryside.</p> <p>SA-84 is directly adjacent to SA-63 on the west and SA-64 to the south. The removal of SA-84 in isolation would create a hole in the Green Belt. As the eastern and western edges of SA-64 have already been subject to development and have an urban feel, the removal of SA-84 from the Green Belt in isolation would have a limited impact on the performance of SA-64 against Purposes 3. However, as the majority of SA-63 is free of development and when considering the sloping topography of SA-84, removing SA-84 from the Green Belt would reduce the performance of SA-63 against Purpose 3.</p> <p>If SA-84 were released in combination with SA-63 and SA-64, it would lead to significant encroachment into the countryside, and irregular and disproportionate sprawl of Elstree. This would impact on the performance of the wider strategic Green Belt.</p> <p>The Inset Village Boundary Assessment (2021) proposes new inset boundaries for that part of Elstree currently washed over by the Green Belt. If these proposals are taken forward in the new Local Plan, SA-84 would be adjacent to the newly inset part of Elstree by its south east tip only. The release of SA-84 in isolation would lead to the irregular sprawl of Elstree and the almost total enclosure of SA-64. However, if SA-84 was released in combination with SA-64 (which was recommended for release in the Stage 2 GBA as RC-6), it would round off the settlement. Given that there is a historic park and garden to the north and east of sub-area, this would provide a strong policy barrier to any further sprawl of the settlement.</p> <p>Overall, the release of SA-84 in isolation would impact on the performance of the wider strategic Green Belt creating a hole in the Green Belt. However, its release in combination with SA-64 and inseting of the washed over part of Elstree is unlikely to have a significant impact on the performance of the wider strategic Green Belt given the scale of gaps between settlements and existing built form.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>SA-84 does not have any existing inner Green Belt boundaries as it does not adjoin the inset part of Elstree.</p> <p>Only its western outer boundary (Aldenham Road) is readily recognisable and likely to be permanent. The rest of the outer boundaries are less durable and permanent, consisting of the edge of historic park and garden and an intermittent tree belt and hedgerow.</p> <p>If released, the sub-area would therefore result in the designation of a largely weak Green Belt boundary. All boundaries except the western boundary would require strengthening to ensure they are readily recognisable and likely to be permanent.</p>
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Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria strongly but makes a less important contribution to the wider strategic Green Belt. Recommended for further consideration in combination only.
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Site Photos



Photograph 1: Looking east towards residential development in the sub-area



Photograph 2: Facing east towards bordering residential development.

Site Photos



Photograph 3: Facing north-west towards grassy fields within the sub-area and wider countryside.



Photograph 4: Facing south-west looking towards residential development bordering sub-area.

Sub-area	SA-85	
Area (ha)	35.23	
Green Belt Parcel (GBA)	3	



Description	<p>The sub-area is located to the south-east of Elstree. It is bounded by a mature treeline and woodland adjacent to the M1 to the south, a mature tree line to the west, Fortune Lane, backs of residential properties and Barnet Lane (A411) to the north, and Edgwarebury Lane to the west.</p> <p>The sub-area directly adjoins Elstree.</p>
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Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

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

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	<p>The sub-area forms a wider part of the gap between Elstree and Borehamwood, although this gap is already compromised by ribbon development along the A411 (Barnet Lane). Despite this the sub-area helps to maintain the overall openness and scale of this gap.</p> <p>The sub-area also forms a less-essential gap between Elstree and the Greater London Built-Up Area (Edgware), which is of sufficient scale and character than the settlements are unlikely to merge. While there are some long views southwards from the sub-area, there is no indivisibility between Elstree and the edge of Greater London. Additionally, the M1 serves as an additional buffer to prevent the merging of settlements.</p>	3
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Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>Approximately 2% of the sub-area is covered by built form, comprising a mix of residential and hotel/tourism accommodation with associated landscaped gardens, access roads, driveways and hardstanding. This is found in the north and east of the area, contributing to a more urban feel. The built development is largely screened from the wider countryside by dense treelines and wooded areas.</p> <p>The remaining majority of the sub-area remains open, comprising fields with dispersed trees offering stronger views out to the wider countryside as a result of its rising topography.</p> <p>Overall, the sub-area has a largely rural character.</p>	3
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Purpose 4 Assessment

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

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	3	3	5	4	0
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (3), which did not perform against Purpose 4 and scored moderately against Purpose 1, preventing the outward sprawl of Borehamwood. The Parcel scored strongly against Purposes 2 and 3, forming the essential gap between Borehamwood and Elstree and a large part of the wider gap between Borehamwood, Elstree and Greater London (Chipping Barnet / Edgware), and preventing encroachment into an area which, overall, was considered to possess a strong, unspoilt rural character.</p> <p>At the more granular level, the sub-area performs more weakly than the wider Parcel against Purposes 1, 2 and 3. The sub-area does not meet Purpose 1 as it is not physically connected to a large built-up area. It also plays a lesser role against Purpose 2 as a result of its smaller scale in the context of the Parcel and due to the overall configuration of the gaps between Elstree and Borehamwood, and Elstree and Greater London. It also performs a lesser role against Purpose 3 due to the greater prevalence of built form and additional urbanising influences when compared with the overall Parcel. In line with the wider Parcel, the sub-area does not meet Purpose 4.</p> <p>SA-85 is directly adjacent to SA-65 to the east and SA-51 to the north. If SA-85 is removed from the Green Belt it would weaken the performance of SA-51 against Purpose 3 as it would introduce additional urbanising influences along part of its southern boundary. It would also significantly affect the performance of SA-65 against Purpose 3 due to the sloping topography and existing open views to countryside in the southern portion of the sub-area. It would lead to the almost total enclosure of SA-65.</p> <p>Removal of SA-85 in combination with SA-51 and SA-65 would have a significant impact on the role of the Strategic Green Belt. It would contribute to the actual and perceptual encroachment into the countryside. The removal would lead to the substantial physical and visual coalescence of Borehamwood and Elstree. It would also narrow the gap between Elstree and Greater London, although it is acknowledged that the M1 serves as an additional buffer to prevent the merging of settlements. Combined release would lead to sprawl and disproportionate expansion of Elstree with significant encroachment into the countryside and reducing the rurality of an area of Green Belt already impacted by piecemeal developments.</p> <p>Overall, it is considered that the sub-area plays an important role in terms of the wider strategic Green Belt. Its removal in isolation would result in encroachment into a wider area of Green Belt (Purpose 3) due to its strong visual linkage with the wider Green Belt. If released in combination, it would also result in merging of settlements.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The inner boundaries of the sub-area are readily recognisable and likely to be permanent, comprising:</p> <ul style="list-style-type: none"> - Fortune Lane and well-defined, rectilinear backs or properties and gardens to the north-west <p>The outer boundary of the sub-area is partly formed of features that are readily recognisable and likely to be permanent, specifically:</p> <ul style="list-style-type: none"> - The edges of densely planted buffers along the M1 to the south - Barnet Lane (A411) to the north - Edgwarebury Lane and mature tree line to the north-east - Fortune Lane <p>The south-western outer boundary of the sub-area is 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. If released, the sub-area would therefore result in the designation of a weaker Green Belt boundary than the existing inner Green Belt boundary. The western boundary would require strengthening to ensure it is readily recognisable and likely to be permanent.</p>
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Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria moderately but makes an important contribution to the wider strategic Green Belt. Not recommended.
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Site Photos



Photograph 1: Looking east towards a grassy field within sub-area and bordering residential development.



Photograph 2: Looking south-west at the entrance to The Manor Hotel within the sub-area.

Site Photos

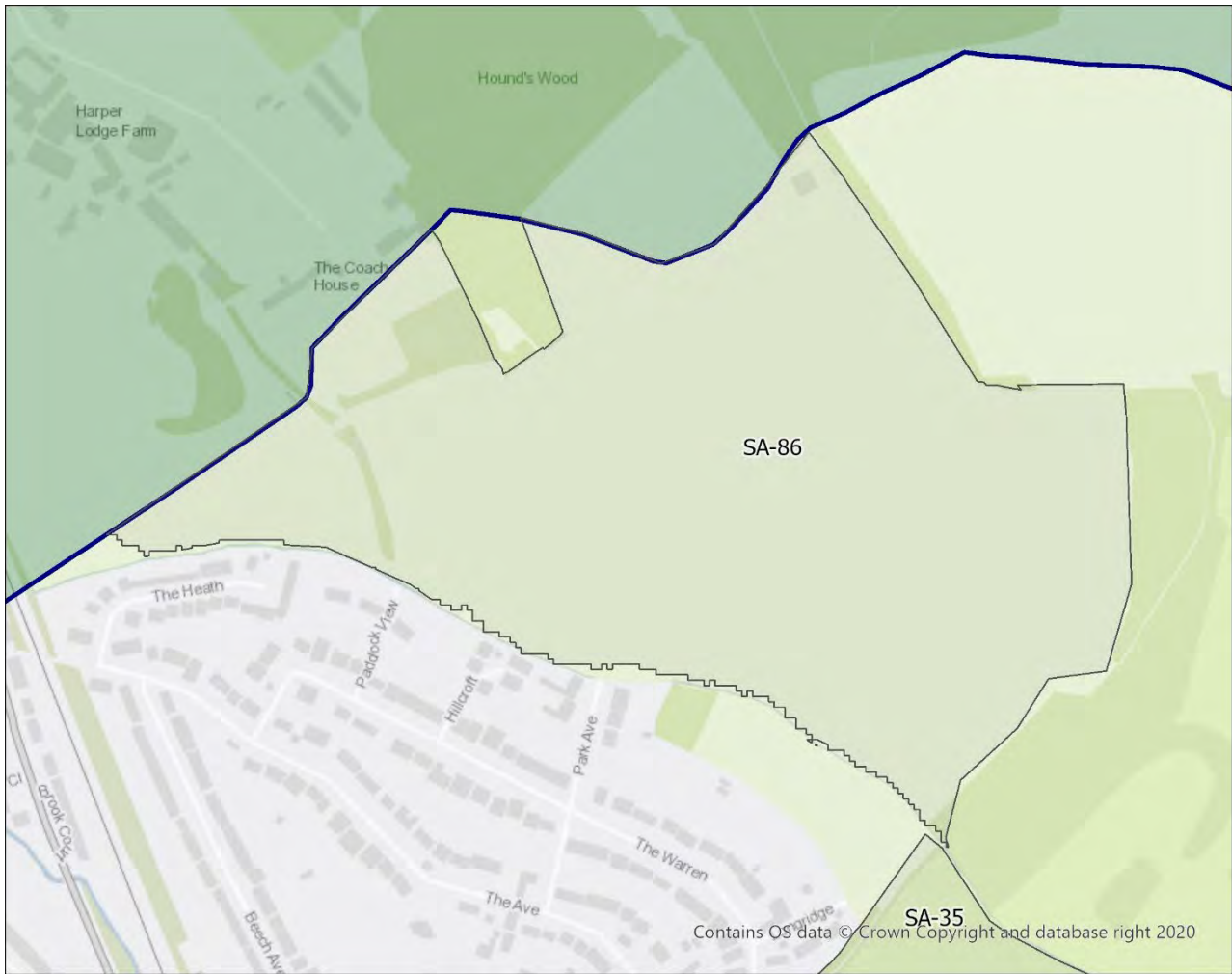


Photograph 3: Looking west from Edwarebury Lane into grassy fields and wider countryside within the sub-area.



Photograph 4: Looking west from Edwarebury Lane into grassy fields and wider countryside within the sub-area.

Sub-area	SA-86	
Area (ha)	29.38	
Green Belt Parcel (GBA)	38	



Description	<p>The sub-area is located to the north-east of Radlett and west of Shenley. It is bounded by the edge of Flood Zone 3 and ancient woodland to the south-west, the Neighbouring Authorities' Green Belt boundary and ancient woodland to the north-west and north, and ancient woodland and mature treeline to the north-east, east and south-east.</p> <p>The sub-area directly adjoins Radlett to the south-west.</p>
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Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment

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

Purpose 2 Assessment

(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	The sub-area forms a wider part of the gap between Radlett and Shenley. There may be scope for some development but the overall openness and the scale of the gap is important to restrict merging.	3
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Purpose 3 Assessment

(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	<p>Note: Unable to access site. This assessment has been completed largely from aerial photography.</p> <p>Less than 1% of the sub-area is covered by built form, comprising a warehouse/shed structure with associated hardstanding in the north of the sub-area. Residential development along the southern boundary of the sub-area provides a slight urbanising influence, although this largely screened by mature treeline and hedgerows.</p> <p>The majority of the area comprises open arable fields. The predominantly flat topography and the mature tree lines / woodlands to the north, east, and south create a strong sense of enclosure of the sub-area. Due to the large size of the sub-area there may be portions of the sub-area with longer views. Overall the sub-area a strong unspoilt rural character.</p>	5
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Purpose 4 Assessment

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

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	38	0	5	3	0
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (38) which does not meet the assessment criteria for Purposes 1 and 4. The wider Parcel was identified as performing strongly against Purpose 2 by forming the essential gap between Radlett and Shenley. It performed moderately against Purpose 3 as a result of its largely rural character but with some urbanising influences throughout.</p> <p>At the more granular level, SA-86 performs similarly against Purpose 1, as it is not at the edge of a large built-up area. It performs more weakly against Purpose 2 due to its smaller scale, SA-86 forms only part of the wider gap between Radlett and Shenley, thus performing a less important role within the wider Parcel against the Purpose 2. The sub-area performs more strongly than the wider Parcel against Purpose 3 when preventing encroachment into the countryside as there is a general absence of built form. In line with the wider Parcel, the sub-area does not meet Purpose 4.</p> <p>SA-86 is adjacent to a small part of SA-35 at the south-east tip. The removal of SA-86 would have a limited impact on the performance of SA-35 due to the thick treelines and woodland, which provide visual separation between these two areas.</p> <p>In combination, the removal of SA-35 and SA-86 would lead to significant encroachment into an area of open countryside and diminish the role performance of the strategic Green Belt in this area. Further Radlett and Shenley would almost entirely coalesce.</p> <p>As it is located on the borough boundary, SA-86 may be impacted by potential Green Belt releases in the neighbouring district. SA-86 is directly adjacent to / overlaps with two St Albans sub-areas (SA-152 and SA-157) to the north-west, that were assessed as part of St Albans Stage 2 Green Belt review. SA-152 was recommended for consideration for potential release, while SA-157 was recommended for retention within the Green Belt. The St Albans Draft Local Plan 2041 Regulation 18 Consultation included SA-152 as a potential site allocation. If SA-152 is released when the St Albans Local Plan is adopted, it would lead to the almost total enclosure of the western tip of SA-86.</p> <p>Overall, the release of SA-86 in its entirety would have a significant impact to the performance of the wider strategic Green Belt. Its removal would result in encroachment into the countryside and reduce the gap between Radlett and Shenley. However, given the proposals to release land immediately to the north in St Albans district, there may be scope to release the western tip of the sub-area without harming the performance of the wider strategic Green Belt.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>- The inner boundary of the sub-area is not readily recognisable or likely to be permanent, comprising the edge of Flood Zone 3</p> <p>The outer boundaries of the sub-area are predominantly formed of features that are not readily recognisable, specifically the neighbouring authority Green Belt boundary and ancient woodland.</p> <p>If released in its entirety, the sub-area would result in weak Green Belt boundaries, which would require strengthening to ensure they are readily recognisable and likely to be permanent.</p> <p>If there was a partial removal of the western tip of the sub-area, there is a natural boundary in the form of a mature treeline. This would likely require further strengthening, in particular to address the small gap to the south.</p>
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Step 5: Categorisation

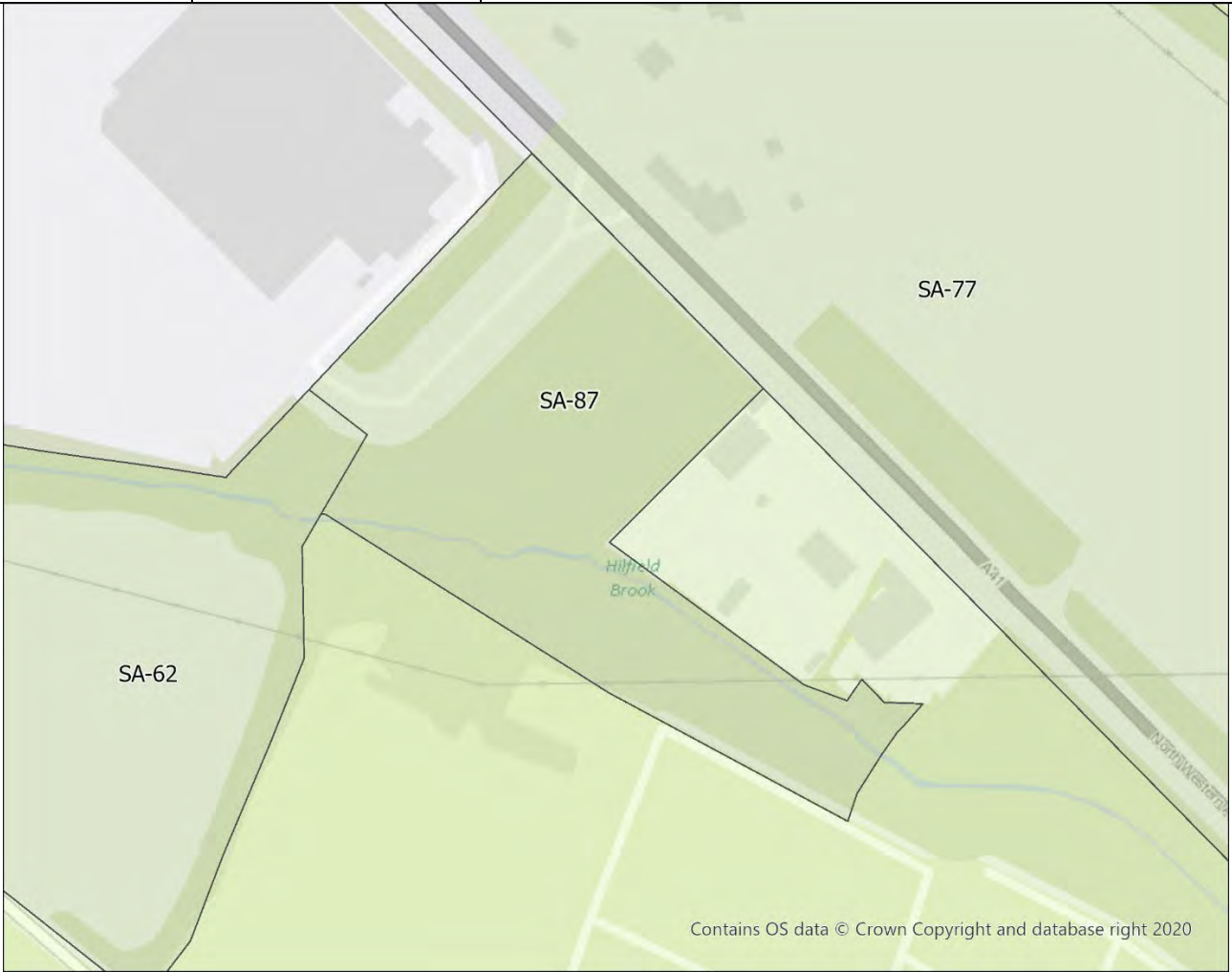
Sub-area category	Meets Purpose assessment criteria strongly but the western tip makes a less important contribution to the wider strategic Green Belt. Western tip recommended for further consideration.
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Site Photos



Photograph 1: Aerial view of SA-86, showing sub-area boundary and surrounding land-uses. Aerial photography used as a result of limited access to the sub-area.

Sub-area	SA-87	
Area (ha)	5.58	
Green Belt Parcel (GBA)	6	



Description	<p>The sub-area is located to the south-east of North Bushey and north of Bushey Heath/Bushey Village . It is bounded by the A41 (N Western Ave), dense woodland along the edge of commercial site to the east, ancient woodland to the south-east and a cemetery to the south-west, woodland to the west and north west and the edge of a retail site to the north.</p> <p>The sub-area directly adjoins North Bushey.</p>
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Step 4A: Assessment of Sub-area Against NPPF Purposes 1-4

Purpose 1 Assessment			
Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas	(a) Land parcel is at the edge of one or more distinct large built-up areas	The sub-area is not at the edge of a distinct large built-up area, in physical or perceptual terms.	FAIL
	(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	N/A	0
Purpose 2 Assessment			
(2) To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	The sub-area forms a less essential part of a wider gap between North Bushey and Bushey Heath/Bushey Village. There may be scope for some development but the overall openness and the scale of the gap is important to restricting merging. The sub-area plays an important role in preventing ribbon development along the A41, which would reduce the scale of the gap (both physically and perceptually).	3
Purpose 3 Assessment			
(3) Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development	Less than 1% of the sub-area is covered by built form, which comprises an access road to the adjacent retail site. The majority of the sub-area comprises mature woodland, which prevents views to wider countryside. There are urbanising influences from surrounding uses (A41 N Western Avenue, retail site, commercial site and cemetery) and from the overhead powerlines traversing the site from the south-east corner to the centre of the western boundary. Overall, the sub-area has a largely rural character.	3
Purpose 4 Assessment			
(4) To preserve the setting and specific character of historic towns	Protects land which provides immediate and wider context for a historic town	The sub-area does not abut an identified historic settlement core and does not meet this Purpose.	0

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

Green Belt Parcel (GBA) and Scores	GBA Parcel no.	Purpose 1	Purpose 2	Purpose 3	Purpose 4
		6	3	5	3
Assessment of wider impact	<p>The sub-area is within Green Belt Parcel (6) which was identified as performing moderately against Purpose 1 as it is connected to the large built-up area of Watford, and against Purpose 3 as it is characterised by pastoral fields and long views. It performed particularly strongly against Purpose 2 for maintaining the narrow gaps between Watford, Bushey Heath/Bushey Village, North Bushey and Elstree. It did not meet the assessment criteria for Purpose 4.</p> <p>At the more granular level, SA-87 does not meet Purpose 1 as it is not at the edge of a large built-up area . It plays a lesser role against Purpose 2; forming a smaller part of the gap between North Bushey and Bushey Heath/Bushey Village It performs similarly against Purpose 3 as the wider Parcel, with a largely character within and views towards adjacent urbanising influences and limited visual connections with the wider countryside. In line with the wider Parcel does not meet Purpose 4.</p> <p>The sub-area adjoins SA-77 to the east and SA-62 to the west. The removal of SA-87 in isolation is unlikely to significantly reduce the neighbouring sub-areas contribution to Purpose 3 given the existing urbanising influences within SA-77, and the mature tree line screening SA-62. However, the release of SA-87 would contribute to ribbon development along the A41 which would create an irregular pattern of development.</p> <p>In combination, the release of SA-87 and SA-77 or SA-62 would contribute greatly to ribbon development along the A41, and result in a disproportionate amount of sprawl from North Bushey. In combination with the urban managed landscape associated with the cemetery, it would further narrow the gap between North Bushey and Bushey. Overall, the release of SA-87 is likely to impact to the performance of the wider strategic Green Belt. Whilst the sub-area does not play a prominent role in preventing encroachment into the wider countryside as a result of its scale, it does play a more important role in preventing the sprawl of North Bushey and preventing the coalescence of North Bushey and Bushey Village/Bushey Heath through ribbon development.</p>				

Step 4C: Consideration of Boundaries

Commentary on boundary features and impact on green belt boundary strength	<p>The inner boundary to the north-west is readily recognisable and likely to be permanent formed by the regular edge of a retail site.</p> <p>The outer boundary to the east and south-west are readily recognisable and permanent comprising the A41 and an access road along the edge of cemetery. The remaining outer boundaries to the south-east, and west are less readily recognisable and permanent comprising ancient woodland and mature treeline.</p> <p>If released, the sub-area would result in the designation of a partially weaker Green Belt boundary than the existing inner Green Belt boundary. This would require strengthening to ensure it is readily recognisable and likely to be permanent.</p>
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Step 5: Categorisation

Sub-area category	Meets Purpose assessment criteria moderately but makes an important contribution to the wider strategic Green Belt. Not recommended for further consideration.
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Site Photos



Photograph 1: Facing north into the sub-area towards a river crossing.



Photograph 2: Looking north-west upstream from the stream located within the sub-area.

Site Photos



Photograph 3: Facing south-west looking toward dense woodland located within the sub-area.



Photograph 4: Facing south-west towards the retail site access road to located within the sub-area.