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Three Rivers District Council Green Belt Study

Stage 3: New Settlement Analysis

Prepared by LUC
January 2020

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Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
GIS & Visualisation

LUC LONDON
250 Waterloo Road
London
SE1 8RD
T +44 (0)20 7383 5784
london@landuse.co.uk



FS 566056 EMS 566057

Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chilton Street
London NW1 1JD

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Offices also in Bristol Edinburgh Glasgow Lancaster Manchester

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1 Introduction and Scope

Study Aim and Context

- 1.1 In October 2019 LUC completed an assessment of relative harm to the five purposes of Green Belt (as set out in the National Planning Policy Framework (NPPF)) of releasing land to extend existing non-Green Belt settlements in Three Rivers and in the neighbouring Borough of Watford¹. This considered variations in contribution to the Green Belt purposes alongside variations in the impact of release of land on the integrity of adjacent Green Belt land in order to arrive at overall judgements on variations in harm.
- 1.2 The study of Green Belt harm represented Stage 2 of an assessment process. This followed on from a Stage 1 Study which included a strategic analysis of the contribution of Green Belt land to the five purposes of the designation, together with an analysis of the potential to 'inset' (ie release from the Green Belt) settlements currently within the designated area (ie 'washed-over')².
- 1.3 The analysis presented in this report forms Stage 3 in the Green Belt assessment process : the identification of variations in harm to the Green Belt purposes that would result from the creation of a new inset settlement, distinct from any existing inset areas.
- 1.4 The policy context for Green Belt analysis both nationally and locally is set out in Chapter 2 of the Stage 2 Green Belt Assessment and is not repeated in this report.

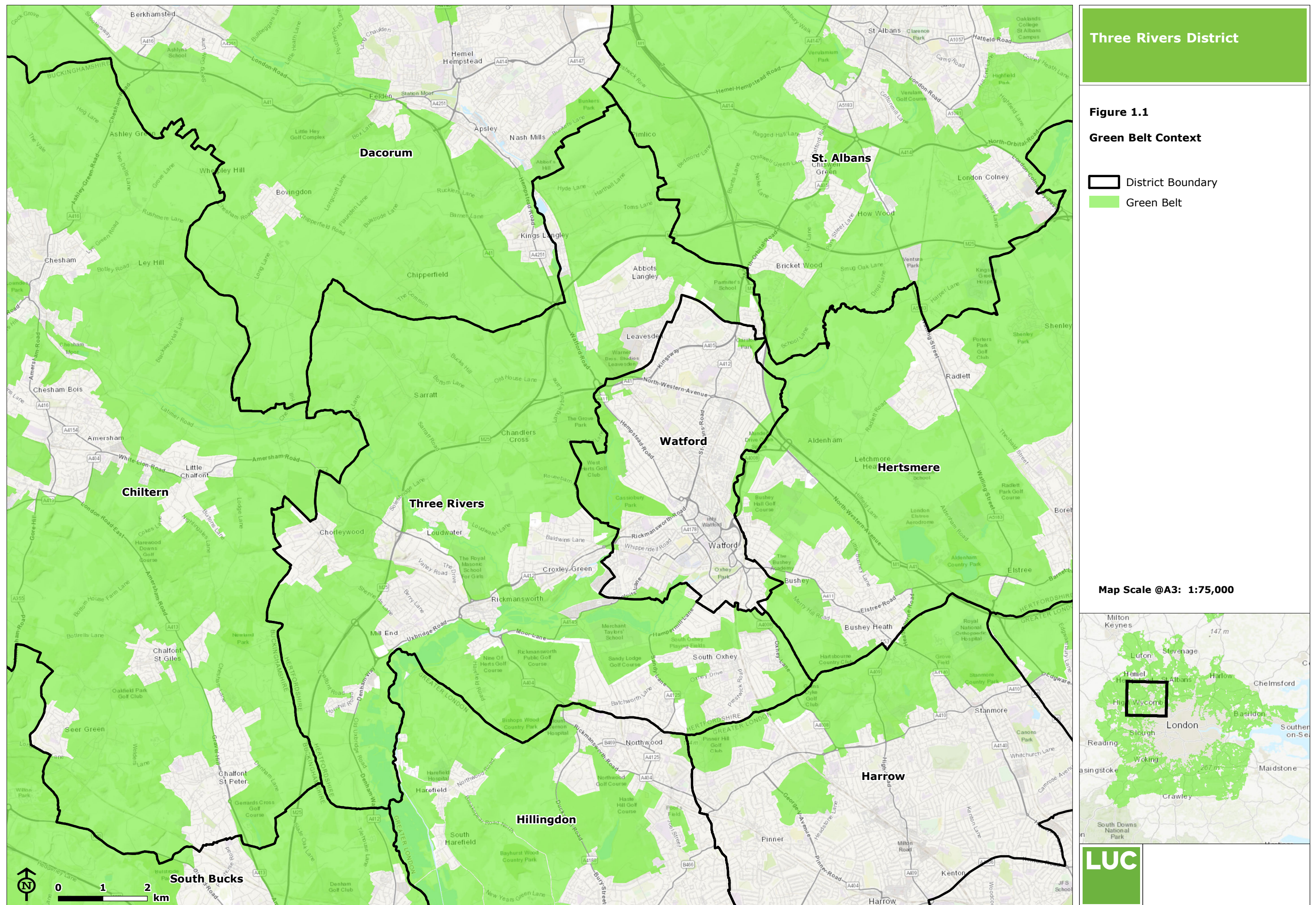
Study Scope and Definitions

- 1.5 As with the Stage 2 study, this assessment addresses harm to the Green Belt purposes, considering the contribution made to those purposes by land which would need to be released, together with the impact this would have on the contribution made by adjacent Green Belt land.
- 1.6 The concept of assessing the *harm* to Green Belt purposes that would result from release of land for development, as a progression beyond the assessment of *contribution* of land to Green Belt purposes, is derived from one of the tests established in the Calverton Parish Council (2015) case. The Inspector in this case stated that in determining whether 'exceptional circumstances' exist sufficient to warrant Green Belt release, the local planning authority should consider the following:
 - *"the acuteness/intensity of the objectively assessed need (matters of degree may be important);*
 - *the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
 - *(on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
 - *the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and*
 - *the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent."*³

¹ Stage 2 Green Belt Assessment for Three Rivers District and Watford Borough (LUC, October 2019)

² Three Rivers District Council & Watford Borough Council Green Belt Review – Strategic Analysis (Amec Foster Wheeler, August 2017)

³ Neutral Citation Number: [\[2015\] EWHC 1078](#)



- 1.7 Geographically the assessment was limited to the consideration of a new settlement contained entirely within the Three Rivers District. However, the assessment of harm to the Green Belt purposes that would result from this also takes into consideration the impact on land in neighbouring districts. The Green Belt in Three Rivers and adjacent districts is shown in **Figure 1.1**.
- 1.8 As with the Stage 2 study, this Stage 3 assessment considered variations in relative harm to the five Green Belt purposes, which are set out within the NPPF⁴ (at paragraph 134) as:
- to check the unrestricted sprawl of large built up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.9 Neither the NPPF nor National Planning Practice Guidance (NPPG) provides guidance on how to undertake Green Belt reviews. Methodologically, the harm assessment process was consistent with that employed in the Stage 2 analysis, but with initial steps to identify the areas in which a new settlement could theoretically be accommodated. As a start point, this filtering process required the definition of a minimum size for a new settlement, based on requirements provided by Three Rivers District Council.
- 1.10 The Council specified that a new settlement would need to accommodate a minimum of 3,000 dwellings, with associated community and educational facilities, at a minimum development density of 40 dwellings per hectare (dph).
- 1.11 As with the Stage 1 and Stage 2 assessments, it is important to recognise that this study has only considered harm to the Green Belt purposes. It has not considered other environmental and sustainability issues, such as traffic, access, landscape and biodiversity impacts, that would be important considerations in any decision to release Green Belt land for development of a new settlement.

Report Structure

- 1.12 The remainder of this report is structured as follows:
- **Chapter 2** sets out the methodology used to:
 - i) identify 'search areas' that could potentially accommodate a new inset settlement meeting the housing and density requirements set out above; and
 - ii) assess variations in the harm to Green Belt purposes that would result from release of land.
- Please see Chapter 2 of the Stage 2 Green Belt Study for a more detailed analysis of case law and inspectors' comments at Local Plan examinations relating to Green Belt.
- **Chapter 3** presents the findings of the assessment, organised by search area.

⁴ National Planning Policy Framework (Ministry of Housing, Communities & Local Government, first published March 2012, latest update June 2019)

2 Methodology

- 2.1 This chapter sets out the methodology used to assess the harm to the Green Belt purposes that would result from creation of a new inset settlement. Two steps are identified:
- Step 1 – Identification of Search Areas.
 - Step 2 – Assessment of Harm to Green Belt Purposes.

Step 1 – Identification of Search Areas

Calculation of size of land area required for a new settlement

- 2.2 Three Rivers District Council have specified a minimum requirement for a new settlement of 3,000 dwellings plus some community and educational facilities, at a minimum density of 40dph. In discussions with the Council it was agreed that a 70% gross to net ratio should be applied to the 40dph density figure to allow for public open space and infrastructure requirements, and for community and educational facilities. On this basis, a 3,000 dwelling settlement would require 107 hectares of land. This figure was rounded down to 100 hectares as an indicative minimum size.

Separation from existing inset settlements

- 2.3 For the release of land to constitute a distinct new settlement, some separation from the existing inset areas is required. There is no fixed gap distance to define this, with landform, land cover and connectivity factors combining to influence the distance beyond which any given settlement could be perceived to be separate. However, a minimum figure of 250m was used in the initial analysis step, with the assumption that any smaller gap would be too weak in Green Belt terms – ie too contained by development – for the settlements in question to be considered adequately separate. The subsequent harm assessment goes on to consider, for each search area, whether larger gaps would result in less impact on the integrity of remaining Green Belt.

Land excluded from area available for development

- 2.4 Any area of 100 hectares is likely to contain some existing washed-over built development which would in practice diminish the availability of land for new development at or above the 40dph minimum density. Any substantial areas of existing development – villages or hamlets – were therefore not taken into account when considering the extent of area available for development within the Green Belt. Smaller clusters of houses, farmsteads or individual dwellings were not deducted from the areas analysed.
- 2.5 Any 100ha area of new development adjacent to existing washed-over development would still be considered to constitute a new settlement; this includes the three most substantial areas of washed-over development in the District: Bedmond, Sarratt and Heronsgate. These three were assessed in the Stage 1 Green Belt study to consider whether they had sufficient urbanising characteristics to warrant more detailed consideration as to whether they should be inset from the Green Belt, with the conclusion that in the case of Bedmond further analysis was justified. The Stage 2 harm study therefore assessed Bedmond in the same way as existing inset settlements, to consider the harm that would result from release of land already occupied by development and also the harm of expanding the settlement further. However, in line with the methodology for the Stage 2 study, it assessed land outwards from Bedmond only to the point at which further expansion was judged to constitute at least *high* harm to the Green Belt purposes, regardless of resulting settlement size.

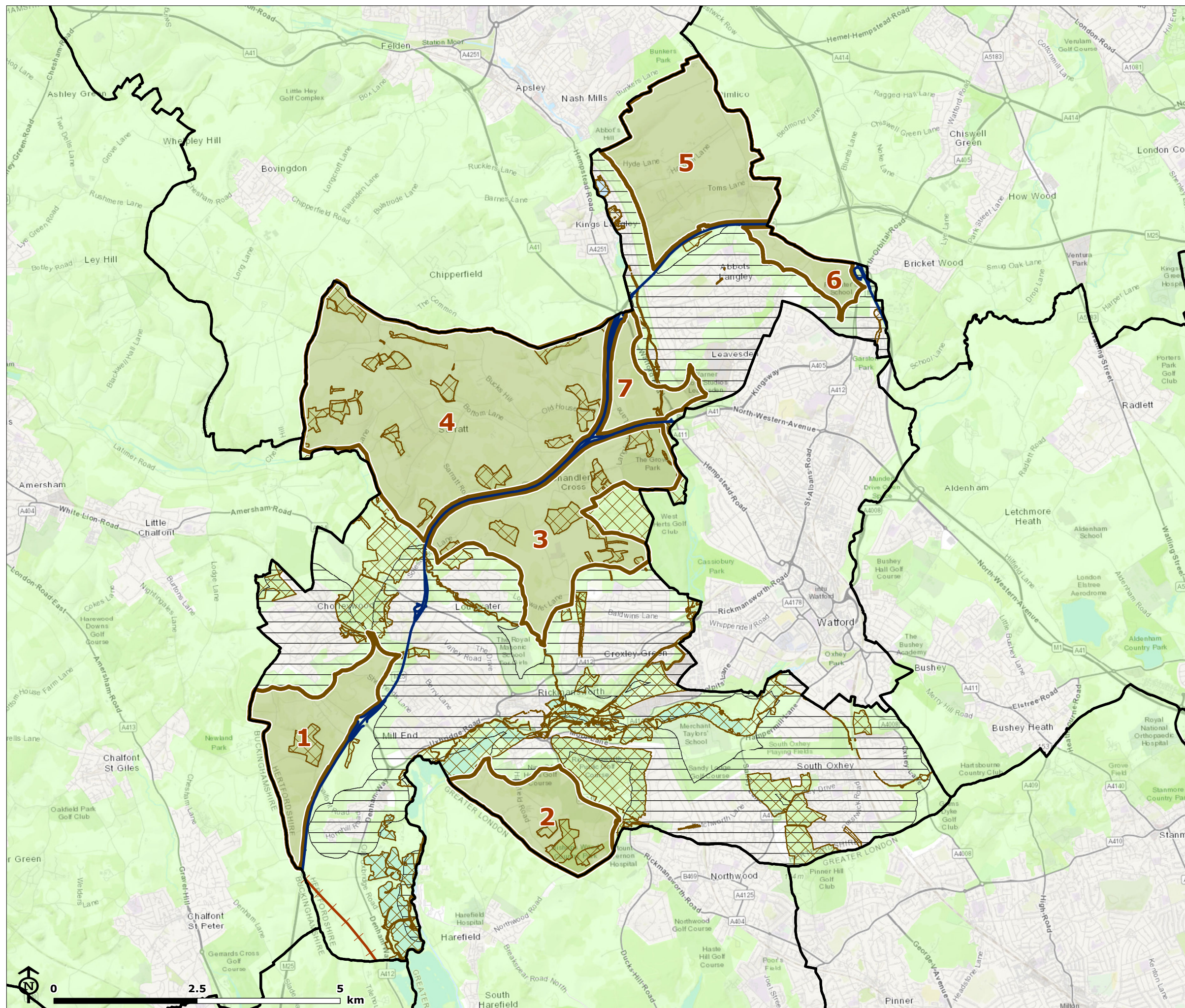
2.6 In addition to substantial washed-over development, all areas with designations considered to constitute an absolute constraint to development were also excluded from the area calculations. This did not preclude the inclusion of absolute constraints from within the identified search areas, as any issues that this might cause, such as the containment of Ancient Woodlands or Sites of Special Scientific Interest (SSSI), would be environmental considerations rather than Green Belt ones, and therefore out of scope of this study. The identified absolute constraints are consistent with those defined for the Stage 2 study and include:

- Scheduled Monuments;
- Registered Parks and Gardens;
- Sites of Special Scientific Interest;
- Local Nature Reserves;
- Ancient Woodland;
- Common land; and
- Flood Zone 3b.

Subdivision of search area

2.7 It was also agreed that a new settlement of 3,000-5,000 dwellings – the latter being the maximum size envisaged by the Council – should not be subdivided by either a motorway or the forthcoming HS2 rail line, as the distance buffers or associated mitigation required to avoid environmental health issues (eg noise) would in effect result in the creation of two separate, smaller communities.

2.8 Applying the above criteria using the ArcGIS mapping tool resulted in seven distinct areas being identified and assessed in Step 2: the assessment of harm to the Green Belt Purposes. These are shown on **Figure 2.1** below. All other Green Belt areas were, applying the selection criteria, less than 100 hectares in size and therefore excluded from further analysis.



Three Rivers District

Figure 2.1

Potential New Settlement Areas

- District Boundary
- Motorway
- HS2 Route
- Green Belt
- Absolute Constraint
- Potential New Settlement Area
- Urban Area with 250m Buffer

Map Scale @A3: 1:65,000

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Step 2 – Assessment of Harm to Green Belt Purposes

Components of the harm assessment

- 2.9 The Stage 2 harm assessment identified parcels around inset settlement edges to reflect variations in harm to the Green Belt purposes. A similar process was applied here, but the focus was on identifying where 100 hectares of developable land would need to be located within the search area to minimise the impact on the Green Belt.
- 2.10 The assessment identified variations within each search area in the contribution to the different Green Belt purposes, but the minimum size requirement for a new settlement determined whether parts of the search area making a higher contribution would need to be considered in the harm rating assessment.
- 2.11 Having identified, for any given search area, the area of at least 100 hectares making the lowest contribution to Green Belt purposes, the components of the overall harm rating were:
- The highest contribution ratings for each Green Belt purpose applicable to land within the identified area;
 - A rating for the level of impact on the contribution of adjacent Green Belt land that would result from release of the land in question.
- 2.12 Where a search area was large enough to accommodate more than one discrete area of lowest harm – i.e. separated by land which if released would result in higher harm – those multiple options for a new settlement location were mapped.
- 2.13 The definitions and criteria underpinning the assessment of variations in contribution to the Green Belt purposes and the consideration of impact on adjacent Green Belt are detailed below. Please see **Chapter 2** of the Stage 2 Green Belt Study for a more detailed analysis of the case law and inspectors' comments at Local Plan examinations relating to Green Belt that have helped inform the methodology.

Assessment of contribution to the Green Belt purposes

Purpose 1 – To check the unrestricted sprawl of large built up areas

- 2.14 It is possible to argue that all Green Belt prevents the unrestricted sprawl of large built up urban areas, because that is its principal purpose as a strategic planning designation. However, the assessment requires the definition of variations in the extent to which land performs this purpose. This requires an area-based assessment against this strategic purpose.
- 2.15 The PAS guidance states in relation to Purpose 1:
- "The terminology of 'sprawl' comes from the 1930s when Green Belt was conceived. Has this term changed in meaning since then? For example, is development that is planned positively through a local plan, and well designed with good masterplanning, sprawl?"*
- 2.16 The guidance emphasises the variable nature of the term 'sprawl' and questions whether positively planned development constitutes 'sprawl'. The RTPI Research Briefing No. 9 (2015) on Urban Form and Sustainability is also not definitive on the meaning of sprawl:
- "As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term 'urban sprawl', ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development."*
- 2.17 Whilst definitions of sprawl vary, the implication of the terminology is that planned development may not contravene this purpose. However, in assessing the contribution land makes to preventing sprawl in a strategic Green Belt study, no assumptions about the form of possible future development can be made, so the role a land area plays will be dependent on its relationship with a large built-up area.

- 2.18 The definition of 'large built-up area' clearly will also have a bearing on contribution of land to Purpose 1. There is no standard definition for this, and no definition provided in the NPPF. Green Belt studies in different locations have ranged from considering the large built-up area as just the principal settlement around which the Green Belt was defined (i.e. London in the case of the Metropolitan Green Belt) to considering all inset settlement to be large built-up areas.
- 2.19 The Stage 1 study, undertaken by Amec Foster Wheeler listed Rickmansworth, Chorleywood, Northwood, Croxley Green and Watford within (or part within) the study authorities, and Hemel Hempstead and Bushey beyond it, as large built-up areas relevant to the assessment.
- 2.20 The principal function of the Metropolitan Green Belt is to check the sprawl of the large built up area of Greater London and those settlements listed above, whilst they all retain separate settlement identities and some degree of physical separation by open land, are all also almost contiguous in terms of linkage along principal routes.
- 2.21 The Green Belt in Three Rivers appears to be effectively managing the pressures for outer London suburbs and towns to expand north and west towards open countryside, which is illustrated by the compact urban form and the transition into open land. As identified in the Stage 1 report the Green Belt land around the northern and western edges of Watford, Croxley Green, Rickmansworth and Chorleywood all make at least a *contribution* to Purpose 1.
- 2.22 The Stage 2 study remained consistent with the Stage 1 study in terms of its identification of settlements considered to form part of the 'large built up area' - i.e. Rickmansworth, Chorleywood, Northwood, Croxley Green, Watford, Hemel Hempstead and Bushey. There are however some settlements such as Loudwater, South Oxhey etc. that are close enough to more contiguous urban development within the settlements outlined above to constitute part of the large built-up area extending out from Greater London. This assessment has remained consistent with the Stage 1 and Stage 2 studies.
- 2.23 The role land plays in preventing sprawl is dependent on the extent of existing development that has occurred, the extent of urban containment and its relationship with existing large built-up area(s). Assumptions about the extent and form of future development which have not been permitted cannot be made. Sprawl includes any built structure that has an impact on openness and/or has an urbanising influence. It does not include development which is classed as appropriate development or not inappropriate development in the Green Belt (as defined in paras 143-147 of the NPPF⁵). There is also a distinction between 'openness' in a Green Belt sense, which relates principally to an absence of urbanising development, and openness in a visual sense, with the latter not being necessary for the former to apply – this is referenced in the consideration of case law and inspectors' comments in Chapter 2 of the Stage 2 Green Belt Study and discussed in paragraphs 3.34-3.38 of the methodology for that study.
- 2.24 To contribute to Purpose 1, land must lie adjacent, or in close proximity, to a large built-up area, and must retain a degree of openness that distinguishes it from the urban area. Land that has a stronger relationship with a large built-up area than with open land, whether due to the presence of, or containment by, existing development, the dominance of adjacent urban development, or the strength of physical separation from the wider countryside, makes a weaker contribution to this purpose and therefore development will have a less significant impact on this purpose. Vice versa, land which is adjacent to the urban edge but which, as a result of its openness and relationship with countryside, is distinct from it makes a stronger contribution and hence development will have a more significant impact on Purpose 1. Development on land which is more clearly associated with a settlement that is not a large built-up area will not have an impact on the contribution to Purpose 1.
- 2.25 A summary of the approach that was used to assess the impact on contribution to Purpose 1 is set out below:

⁵ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in *R (Lee Valley Regional Park Authority) v Epping Forest DC* [2016] EWCA Civ 404. Applying the findings of this case, appropriate development in the Green Belt cannot be contrary to either the first or third Green Belt purpose and should be excluded from the assessments as 'urbanising features' as it is cannot be "urban sprawl" and cannot have an "urbanising influence".

Purpose 1: Check the unrestricted sprawl of large built-up areas	
Significant impact on contribution	Development would constitute significant sprawl as the land is close to the large built-up area, contains no or very limited urban development, is not itself contained by any urban development, and has strong distinction from the inset settlement edge.
Relatively significant impact on contribution	Development would constitute relatively significant sprawl as the land is close to the large built-up area and contains very limited urban development and has a strong sense of openness. It relates more strongly to the wider countryside.
Moderate impact on contribution	Development would constitute moderate sprawl as the land is close to the large built-up area, contains limited urban sprawl and has a relatively strong sense of openness. It may relate to both the settlement and the wider countryside or have a degree of separation from both.
Relatively limited impact on contribution	Development would have relatively limited impact on the contribution to Purpose 1 as the land is close to the large built-up area and already contains urban sprawl compromising the sense of openness, or it relates more strongly to the urban area than to the wider countryside.
Limited or No impact on contribution	Development would have limited or no impact on the contribution to Purpose 1 as: <ul style="list-style-type: none"> the land is close to the large built-up area but is already fully urbanised; or the land is not close enough for there to be any potential for urban sprawl from the large built up area to occur within the parcel.

Purpose 2 – To prevent neighbouring towns from merging into one another

- 2.26 The concept of what constitutes a 'town' has been widely interpreted in different Green Belt studies, ranging from settlements classified as towns in Local Plan settlement hierarchies to all urban areas inset from the Green Belt regardless of size.
- 2.27 Regardless of whether a particular settlement is large enough to realistically be considered a town, it can be acknowledged that smaller settlements may lie in between larger ones, such that loss of separation between them may in turn have a significant impact on the overall separation between larger 'towns'.
- 2.28 The concept of 'merging' is clearer, but assessing the extent which land between towns contributes to preventing this is less so, but it is generally acknowledged that the role land plays in preventing the merging of towns is more than a product of the size of the gap between them. Assessments therefore usually consider both the physical and visual role that Green Belt land plays in preventing the merging of settlements.
- 2.29 This accords with PAS guidance which is commonly referenced in Green Belt studies and states that distance alone should not be used to assess the extent to which the Green Belt prevents neighbouring towns from merging into one another. The PAS guidance also refers to settlement character and the character of land in between as being relevant considerations when looking at retaining separate identities.
- 2.30 The Stage 3 assessment has remained consistent with the Stage 1 and Stage 2 studies in identifying the following as 'neighbouring towns' relevant to land in Three Rivers District:
- Watford and Hemel Hempstead;
 - Watford and St Albans;
 - Watford and Rickmansworth;

- Rickmansworth and Northwood;
- Watford and Northwood;
- Watford and Pinner.

- 2.31 In addition, it is recognised that towns which are further apart may nonetheless have limited separation, particularly along connecting roads, due to the presence of smaller intervening inset areas. Thus the Purpose 2 assessment considered the role of Croxley Green and Abbots Langley in limiting separation between Watford and Rickmansworth and Hemel respectively, the role of land around Chorleywood in the gap between Rickmansworth and Amersham (a gap also narrowed by the inset settlement at Little Chalfont) and the role of land around Maple Cross in the gap between Rickmansworth and Chalfont St Peter / Gerrards Cross.
- 2.32 Both built and natural landscape elements can act to either decrease or increase perceived separation, for example intervisibility, a direct connecting road or rail link or a shared landform may decrease perceived separation, whereas a separating feature such as a woodland block or hill may increase the perception of separation.
- 2.33 A summary of the approach that was used to assess the potential impact on the contribution to Purpose 2 is set out below:

Purpose 2: Prevent neighbouring towns from merging	
Significant impact on contribution	Development would have a significant impact on the contribution to Purpose 2 as it would result in physical or visual coalescence of towns, or would leave a negligible physical gap with no physical elements to preserve separation.
Relatively significant impact on contribution	Development would have a relatively significant impact on the contribution to Purpose 2 as it would result in a significant narrowing of the visual or physical gap between towns with no physical elements to preserve separation.
Moderate impact on contribution	Development would have a moderate impact on the contribution to Purpose 2 as: <ul style="list-style-type: none"> • it would result in significant narrowing of the physical gap, but physical feature(s) would preserve a sense of separation; or • it would result in a moderate narrowing of the physical gap, but with no physical feature(s) to preserve separation.
Relatively limited impact on contribution	Development would have a relatively limited impact on the contribution to Purpose 2 as: <ul style="list-style-type: none"> • it would result in a very limited narrowing of the visual or physical gap with no physical feature(s) to preserve separation; or • it would result in a moderate narrowing of the physical gap, but with physical feature(s) to preserve separation.
Limited or No impact on contribution	Development would have limited or no impact on the contribution to Purpose 2 as: <ul style="list-style-type: none"> • the land is not located within a gap between towns; or • the land plays no role, or a very limited role in maintaining the separation between towns due to the presence of significant separating features and/or significant distances between the towns; or • the land plays no significant role due to the extent of development; or • the land forms a gap that is too narrow to create any clear distinction between towns (i.e. a sense of leaving one and arriving in another).

Purpose 3 – To assist in safeguarding the countryside from encroachment

- 2.34 The third Green Belt purpose focuses on the role of the Green Belt in safeguarding the countryside from encroachment.
- 2.35 PAS guidance presumes that all Green Belt does this to some degree, but suggests that:

"The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved."

The contribution land makes to safeguarding the countryside from encroachment can be considered in terms of the extent to which land displays the characteristics of countryside, i.e. an absence of built or otherwise urbanising use; the extent to which land physically relates to the adjacent settlement and to the wider countryside (i.e. its distinction from the urban area or the wider countryside); and its containment. Evidently land which is remote from existing inset settlements, as a new settlement location to an extent needs to be, can typically be expected to make a stronger contribution to this purpose. There needs to be significant urban influence from adjacent land, and a degree of physical landscape containment to limit contribution to this purpose, and intervisibility between open land and an urban area is not in itself enough to constitute a significant urban influence. The urban area would need to be a dominating influence either through the scale of development or the degree of containment of the open land by development. However, consideration also needs to be given to the presence of urbanising influences within washed-over areas that could have an impact on countryside character.

- 2.36 Determining the extent to which Green Belt land is influenced by urbanising development requires some consideration of the use of land and the extent of its containment by development, but caution is needed when considering what land uses diminish Green Belt openness and diminish the extent to which land can be considered to constitute 'countryside'. Paragraph 145 and 146 of the NPPF and associated case law provides guidance on what land uses and features are considered to be 'appropriate' development in the Green Belt (see Chapter 2 of the Stage 2 Green Belt Study for more details). Appropriate development within the Green Belt cannot, according to case law⁶, be considered to have an urbanising influence and therefore harm Green Belt purposes.
- 2.37 It is important to maintain a distinction between contribution to Purpose 3 and contribution to landscape/visual character. For example, land that displays a strong landscape character in terms of a sense of tranquillity, good management practices or high scenic value, or which has public recreational value, may have high sensitivity from a landscape/visual point of view, but will not make any more contribution to Purpose 3 than land at the urban edge which may be unkempt and lack in scenic value but which retains its openness, some distinction from the inset area and a relationship with the wider countryside.
- 2.38 A summary of the approach that was used to assess the potential impact on the contribution to Purpose 3 is set out below. This assessment has been undertaken in line with the Stage 2 Study approach:

Purpose 3: Assist in safeguarding the countryside from encroachment	
Significant impact on contribution	Development would have a significant impact on the contribution to Purpose 3 as the land contains the characteristics of open countryside (i.e. an absence of built or otherwise urbanising uses in Green Belt terms), is not itself contained by any urban development and has strong distinction from the inset settlement edge.

⁶ This is set out in case law where the Court of Appeal addressed the proper interpretation of Green Belt policy in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404.

Relatively significant impact on contribution	Development would have a relatively significant impact on the contribution to Purpose 3 as the land contains the characteristics of open countryside. It relates more strongly to the wider countryside than the settlement and has very limited urbanising development.
Moderate impact on contribution	Development would have a moderate impact on the contribution to Purpose 3 as: <ul style="list-style-type: none"> the land contains the characteristics of open countryside and has limited urbanising development. The parcel relates to both the settlement and the wider countryside or has a degree of separation from both; or the land relates more strongly to the wider countryside than to the settlement, but openness is compromised by urbanising development within it.
Relatively limited impact on contribution	Development would have a relatively limited impact on the contribution to Purpose 3 as the land has very limited characteristics of open countryside and has urbanising development that compromises openness. The parcel relates more strongly to the settlement than to the wider countryside.
Limited or No impact on contribution	Development would have limited or no impact on the contribution to Purpose 3 as: <ul style="list-style-type: none"> the land contains urbanising development of a scale, density or form that significantly compromises openness; or the land is too influenced and contained by urban development to retain any relationship with the wider countryside.

Purpose 4 – To preserve the setting and special character of historic towns

- 2.39 The fourth Green Belt purpose focuses on the role of the Green Belt in preserving the setting and special character of historic towns. The purpose makes specific reference to 'historic towns' not individual historical assets or smaller settlements such as villages and hamlets, but Green Belt studies have offered a range of interpretations, with a common approach being to consider the relationship with designated Conservation Areas regardless of their location.
- 2.40 An extract from Hansard in 1988 clarifies which historic settlements in England were considered 'historic towns' in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge⁷. Durham has since been added to this list. This is supported by the PAS guidance which states: that "*This purpose is generally accepted as relating to very few settlements in practice.*"
- 2.41 The Stage 1 study stated that "*there are no historic towns within, or adjacent to, the study area*", but went on to apply analysis in what was termed a 'local context' by considering the relationship between Green Belt land and designated Conservation Areas. By this measure three areas were judged to make a *significant contribution* to Purpose 4: the adjacent golf courses at Moor Park and Rickmansworth, land at Leavesden Country Park, Chorleywood Common and woodland to the south of Watford Heath. Many other parcels of land located adjacent or close to Conservation Areas were considered to make a *contribution* to their settings.
- 2.42 Clearly there are historic aspects to towns and smaller settlements within the study area, but the important aspect in terms of contribution to this purpose is that there needs to be a significant relationship between Green Belt land and historic aspects of a settlement's setting, such that some degree of special character results. Rickmansworth has a historic core with a range of building styles and materials, nationally listed buildings and three Conservation Areas. However, while the historic core remains, this is now surrounded by the railway to the north, 'A' roads and

⁷ Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) Response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3

suburban housing which limit the historic core's relationship with the wider Green Belt. Other than the role the Rivers Chess and Colne, and the Grand Union Canal played with regards to the industry of the town, and currently play in the physical constraint of southern expansion, the conservation area appraisals do not mention any important views, or linkages with the surrounding countryside.

- 2.43 Watford contains a number of heritage assets and ten Conservation Areas which reflect the historic development of the town, but suburban housing and industrial uses surround the historic core and limit the town's relationship with adjacent Green Belt land in Three Rivers. The Civic Core Conservation Area lies near Cassiobury Park, which lies within the Green Belt and retains some historic elements, but the relationship between the town centre with the park is now limited by the A412 Rickmansworth Road and newer suburban housing, known as 'Metroland' housing which followed the Metropolitan line out from London and led to areas of large houses with large gardens. Much of the setting for the Grove Mill Lane Conservation Area is provided by the sweeping landscape of the historic Grove Estate⁸ – now a hotel and golf course, within the Green Belt. However, this small Conservation Area lies on the outskirts of the town and it is considered that its relationship with the neighbouring Green Belt does not convey 'special character' to Watford as a historic town.
- 2.44 In keeping with the Stage 1 study the Stage 2 work did not identify any historic towns relevant to Green Belt assessment, and what was termed the 'local context' at Stage 1 was considered to be more appropriately the concern of landscape or cultural heritage sensitivity assessments, informed by Conservation Area studies. Therefore all areas assessed at Stage 2 were considered to make no contribution to Green Belt purpose 4. In line with Stage 2, this Stage 3 assessment likewise rates all areas as making no contribution to this purpose.

Purpose 5 – To assist in urban regeneration by encouraging the recycling of derelict and other urban land

- 2.45 Most Green Belt studies do not assess individual Green Belt land parcels against Purpose 5, and either do not rate them or rate them all equally, on the grounds that it is difficult to support arguments that one parcel of Green Belt land makes a higher contribution to encouraging re-use of urban land than another. The PAS guidance states:
- "...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose."*
- 2.46 In other words, it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative contribution of discrete parcels of Green Belt land to Purpose 5.
- 2.47 However, the examination reports of some planning Inspectors, e.g. Cheshire East Council's Local Plan (2014), have highlighted the importance of assessing all five Green Belt purposes, giving each purpose equal weighting. It is also important to consider local circumstances in relation to brownfield land, before concluding whether all land should be rated equally against Purpose 5.
- 2.48 Since the publication of the PAS Guidance and Cheshire East Local Plan Examination Report, the Housing and Planning Act (May 2016) received Royal Assent and the Town and Country Planning Regulations were subsequently updated. Regulation 3 (2017) requires local planning authorities in England to prepare, maintain and publish a 'Brownfield Land Register' of previously developed (brownfield) land appropriate for residential development. In addition, the National Planning Policy Framework requires that local planning authorities prepare an assessment of land which is suitable, available and achievable for housing and economic development – a Housing and Economic Land Availability Assessment (HELAA). Together, these evidence bases provide an accurate and up-to-date area of available brownfield land within individual authority areas.
- 2.49 The Stage 1 Green Belt Study concluded that:
- "The potential contribution to urban regeneration of the Green Belt is difficult to determine with any certainty. The general buoyancy of the land market means that*

⁸ https://www.watford.gov.uk/downloads/file/1324/grove_mill_conservation_area_character_appraisal_january_2017

there are no extensive areas of brownfield land awaiting regeneration onto which Green Belt designation could focus development activity, meaning that there can only be an assumed locally-focused contribution, and the contribution by parcel is limited (and generalised) across the two authorities."

- 2.50 For all parcels it therefore gave a *limited contribution* rating; however the study conclusions did suggest potential at the local scale for land to play a role in encouraging regeneration of specific parts of the larger built-up areas.
- 2.51 The District of Three Rivers' latest brownfield register (December 2019)⁹ contains a record of 45.9 ha of brownfield land which is suitable and available for housing development within the urbanised areas of the District (although it is noted that the above does not include brownfield land which may be suitable for employment and other uses).
- 2.52 The adopted Three Rivers Core Strategy¹⁰ states that there will not be sufficient housing capacity within existing urban areas towards the middle and end of the Plan period, but that there is the potential to meet housing targets from sites both within urban areas and on the edge of urban areas. 75% of the total housing development was envisaged to be in the existing urban area while 25% would need to fall within the Green Belt. It is noted that during the Core Strategy period (2001 – 2026) the housing target was 180 dwellings per year. Once the new Local Plan is adopted this will rise to 620 dwellings per year.
- 2.53 When assessing contribution to the first four Green Belt purposes, it is the characteristics of an area of land and its relationship with settlement and countryside that affect its role. For Purpose 5 however, it is the extent to which brownfield land is used to meet development need that is of primary relevance when judging the extent to which the Green Belt contributes. The housing need figures for Three Rivers indicate that significantly more land will be needed if the latest housing targets are to be met. Councils are required by NPPF Paragraph 137 to utilise brownfield sites before concluding that exceptional circumstances exist to justify releasing Green Belt land, but the fact that available brownfield land will not be capable of meeting housing need suggests that in the future Green Belt land will not make a significant contribution to Purpose 5.
- 2.54 The extent to which Green Belt land would, if released, be capable of redirecting development away from brownfield sites, will in theory vary spatially, but there is no evidence that development pressures operate at a sufficiently localised level for variations in contribution to be identified within Three Rivers. Therefore, the Stage 2 Study concluded that contribution of all Green Belt within Three Rivers was *limited*, and did not undertake any further assessment in relation to Purpose 5. The same approach is therefore taken in this Stage 3 assessment.

Ratings for contribution to the Green Belt purposes

- 2.55 Ratings for contribution employ the same five-point scale as the Stage 2 study: significant / relatively significant / moderate / relatively limited / limited.

Assessment of impact on the contribution of adjacent Green Belt land

- 2.56 Having identified within each search area the 100 hectares or more with the minimum contribution to Green Belt purposes, we considered the extent to which the release of land would diminish the contribution of adjacent Green Belt land. The introduction of any new inset area can be considered to constitute some weakening of the Green Belt, but the degree to which this is the case can be increased through the introduction of relatively weak new boundaries which don't create a clear distinction between the new inset area and the adjacent countryside, and/or through release of land in locations which increase the containment of adjacent Green Belt land between urban areas. This analysis required consideration of the presence of physical features that, if used as Green Belt boundaries, would represent some distinction between a new inset area and the remaining Green Belt.
- 2.57 The extent of this impact on adjacent Green Belt is limited by that land's contribution to the Green Belt purposes – e.g. the increased containment of land that is already largely contained by development, and therefore plays a relatively limited role in relation to the Green Belt purposes,

⁹ <https://www.threerivers.gov.uk/egcl-page/brownfield-land-register>

¹⁰ <https://www.threerivers.gov.uk/egcl-page/core-strategy>

will constitute less of an impact than the containment of land that has a stronger relationship with the wider countryside, and therefore plays a more significant role in relation to the Green Belt purposes.

- 2.58 As with the Stage 2 study, a rating was given for impact on integrity of adjacent Green Belt, using a four-point scale of: *significant* / *moderate* / *minor* / *no or negligible*. Guidelines for each of the four rating levels are set out in **Table 2.1** below.

Table 2.1: Factors affecting the impact of release on adjacent Green Belt land

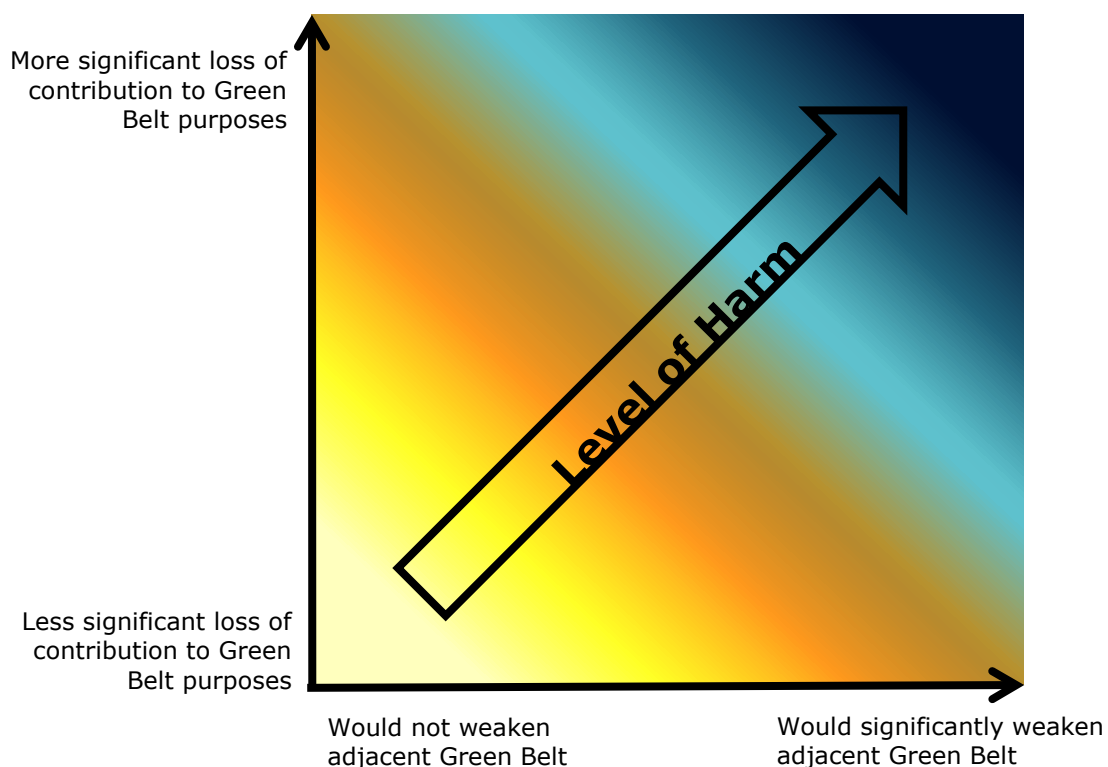
Impact on Adjacent Green Belt	
Major impact	<p>Development would have a major impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> ■ it would significantly increase the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released. <p>and</p> <ul style="list-style-type: none"> ■ it would result in a significantly weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).
Moderate impact	<p>Development would have a moderate impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> ■ it would significantly increase the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released. <p>or</p> <ul style="list-style-type: none"> ■ it would result in a significantly weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary). <p>or</p> <ul style="list-style-type: none"> ■ it would moderately increase the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released; and ■ it would result in a moderately weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).
Minor impact	<p>Development would have a moderate impact on adjacent Green Belt as:</p> <ul style="list-style-type: none"> ■ it would moderately increase the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released. <p>or</p> <ul style="list-style-type: none"> ■ it would result in a moderately weaker distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary). <p>or</p> <ul style="list-style-type: none"> ■ it would result in a minor increase in the containment of adjacent Green Belt land that plays a stronger role in relation to the Green Belt purposes than the land being released; and ■ it would result in a minor weakening of distinction between the inset settlement and the Green Belt (i.e. changing from a strong Green Belt boundary to a weaker, or more convoluted boundary).
No/Negligible impact	<p>Development would have no or negligible impact on adjacent Green Belt as:</p>

Impact on Adjacent Green Belt	
	<ul style="list-style-type: none"> ■ it would not lead to the containment of any adjacent land; or ■ it would contain adjacent Green Belt land that plays a weaker role in relation to the Green Belt purposes than the land being released. <p>and</p> <ul style="list-style-type: none"> ■ it would result in no significant change in strength of distinction between the inset settlement and the Green Belt (i.e. resulting in no significant change in strength of Green Belt boundary); or ■ it would result in a clearer or more consistent distinction between the inset settlement and the Green Belt (i.e. resulting in a clearer or more consistent Green Belt boundary).

Overall harm to the Green Belt purposes

- 2.59 **Figure 2.1** provides an indication as to how loss of contribution to the Green Belt purposes associated with the land that would need to be released, together with the impact this would have on adjacent Green Belt land, influence the overall harm of Green Belt release. However **professional judgement** has been used in each individual case to consider how much weight to attach to each contributing element. Clear and detailed justification is provided for all ratings given in relation to how the overall judgement of Green Belt harm has been reached.
- 2.60 For each search area presented in the Findings chapter below, the area(s) of at least 100 hectares which could be released with lowest harm are mapped. Each area is denoted with an approximate rather than precise line, to reflect the fact that more detailed analysis would be required in order to establish precise boundaries for any release of Green Belt land, but the areas shown approximate to a maximum area that could be released without increasing the level of harm to the Green Belt purposes.

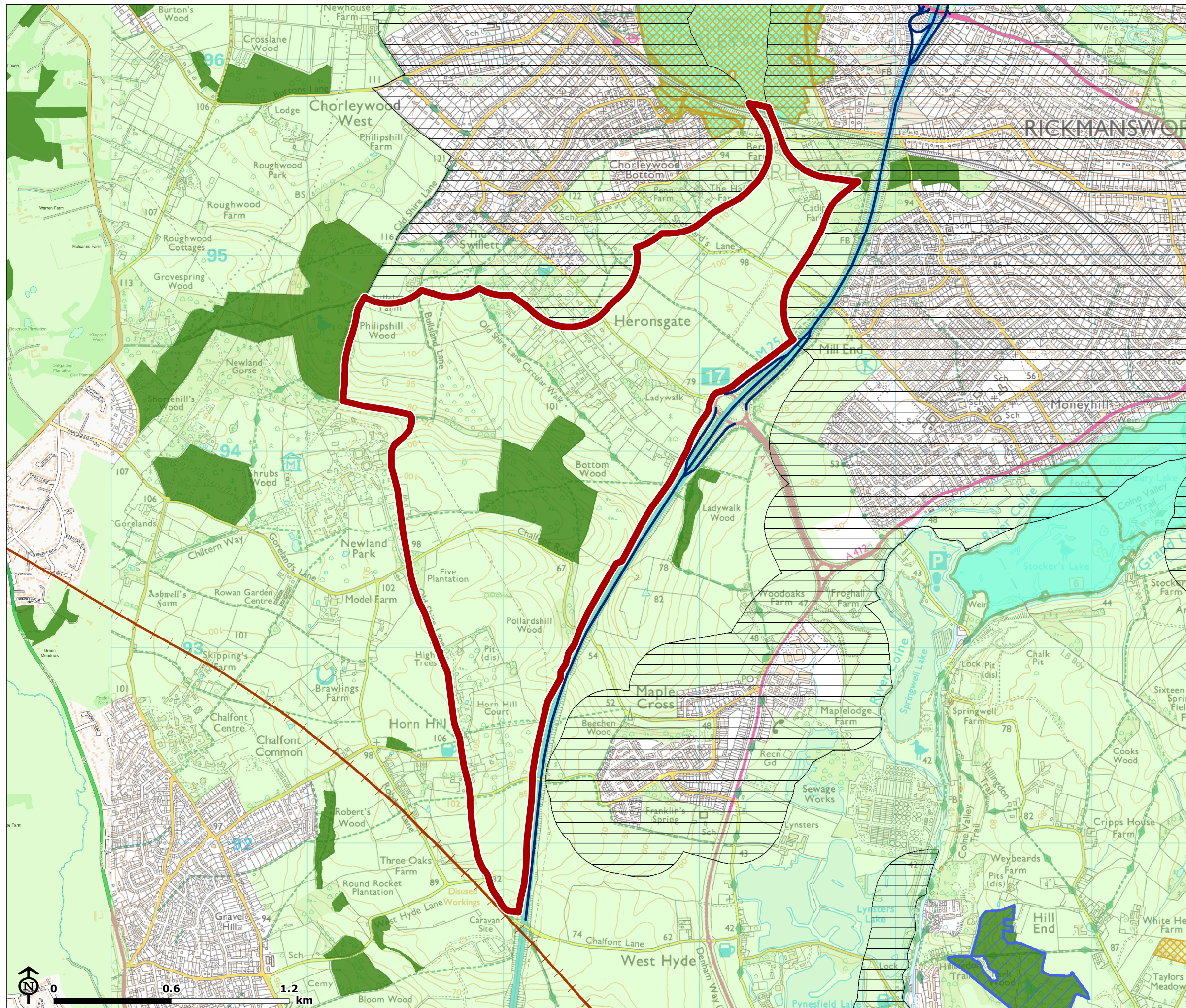
Figure 2.1: rating harm on the basis of loss of contribution of area released and impact on remaining Green Belt



- 2.61 Green Belt harm is rated using a seven-point scale: *very high / high / moderate-high / moderate / low-moderate / low / very low*. For example:
- Where land makes a significant contribution to multiple Green Belt purposes, and where its release would weaken the adjacent Green Belt (for example by leaving a narrow gap between towns), harm is likely to be **very high**.
 - Where land makes a significant contribution to one of the Green Belt purposes, and where its release would partially weaken adjacent Green Belt (for example by increasing its containment by urban areas), harm is likely to be **high**.
 - Where land makes a moderately significant contribution to one of the Green Belt purposes and a lesser contribution to others, but where its release would significantly weaken the adjacent Green Belt (for example by isolating an area of Green Belt that makes a stronger contribution), harm is likely to be **moderate-high**.
 - Where land makes a moderately significant contribution to two of the Green Belt purposes and a lesser contribution to others, but where its release would partially weaken the adjacent Green Belt (for example by increasing containment of adjacent open land, or by creating a less consistent boundary line), harm is likely to be **moderate**.
 - Where land makes a relatively significant contribution to one of the Green Belt purposes, but where its release would not weaken the adjacent Green Belt, harm is likely to be **low-moderate**.
 - Where land makes a relatively limited contribution to one of the Green Belt purposes and a limited contribution to the others, and its release would not result in a weak Green Belt boundary or weaken the integrity of adjacent Green Belt land, harm is likely to be **low**.
 - Where land makes a limited contribution to all Green Belt purposes, and its release would not weaken the integrity of adjacent Green Belt land, harm is likely to be **very low**.

3 Findings

- 3.1 This chapter sets out the assessment findings for each of the seven search areas identified through the analysis process set out in Step 1 of the methodology described in **Chapter 2** above.
- 3.2 In summary, release of 100 hectares of land in any of the search areas would result in at least **high** harm to the Green Belt purposes. In search areas 1, 2 and 6, any such release would result in **very high** harm. In search areas 3, 5 and 7, areas of **high** harm of approximately 160 hectares, 180 hectares and 145 hectares respectively were identified. In area 4 two distinct areas of **high** harm were identified, of 320 and 160 hectares.
- 3.3 The findings of this analysis, including the variations in ratings for contribution which draw out some distinction between overall harm ratings, should be considered alongside evidence relating to impacts on sustainability, environmental and deliverability issues such as (but not limited to) landscape and visual sensitivity, biodiversity, traffic and accessibility, in order to determine the overall suitability of establishing a new settlement in Three Rivers.



Three Rivers District

Potential Settlement Area 1

- Motorway
- Green Belt
- Urban Area 250m Buffer
- Extent of search area
- Constraints**
- Flood Zone 3b
- Local Nature Reserve
- Ancient Woodland
- SSSI
- Common Land
- HS2 Route

Map Scale @A3: 1:19,000

LUC

Search Area 1 – Land south of Chorleywood

Area description

- 3.4 The search area is located in the south western corner of the District, to the west of the M25 between Chorleywood, Maple Cross and Chalfont Common. It is open and undeveloped, being formed primarily of agricultural fields. There is a farm present on the western edge and a small amount of dispersed washed over houses in the southern corner however, these do not have an urbanising influence. The M25 forms a robust boundary to the east, but Hornhill Road provides a direct link across it to Maple Cross. To the west Shire Lane and associated vegetation form a clear physical boundary to the District, but there is some urbanising development between here and Chalfont Common, along Roberts Lane. A strongly defined valley, with a significant component of ancient woodland (Bottom Wood within the District, and Philipshill Wood to the west), runs east-west to the south of the inset settlement of Chorleywood and adjacent washed-over development at Heronsgate.
- 3.5 The search area (excluding constrained land) is approximately 280 hectares in size. To accommodate the minimum area of 100ha, a new settlement boundary would need to extend north from the southern tip of the area as far as the southern side of the valley between Bottom Wood and Newland Park.

Contribution to the Green Belt Purposes

Purpose 1

- 3.6 Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area of Greater London. The significant slope down from the village creates some distinction but land on the south side of the valley is close enough to still make a **relatively significant** contribution to preventing urban sprawl. Higher ground to the south is more distinct from Chorleywood, and although the southern end of the search area lies close to Maple Cross, which itself has limited separation from the large built-up area, the M25 forms a barrier which restricts its contribution to **moderate**.

Purpose 2

- 3.7 The southern part of the search area lies in the gap between the towns of Rickmansworth and Chalfont St Peter / Gerrards Cross, a gap which is narrowed by the presence of intervening inset development at Maple Cross. Perceived separation is only slightly increased by the presence of the M25 because of the link across it provided by Hornhill Road, so land here makes a **moderate** contribution to this purpose. Land further north makes a weaker contribution in this respect.

Purpose 3

- 3.8 There are no significant urbanising influences within the search area, and the nearby inset settlements do not contain or isolate it. Therefore the area makes a **significant** contribution to preventing encroachment on the countryside.

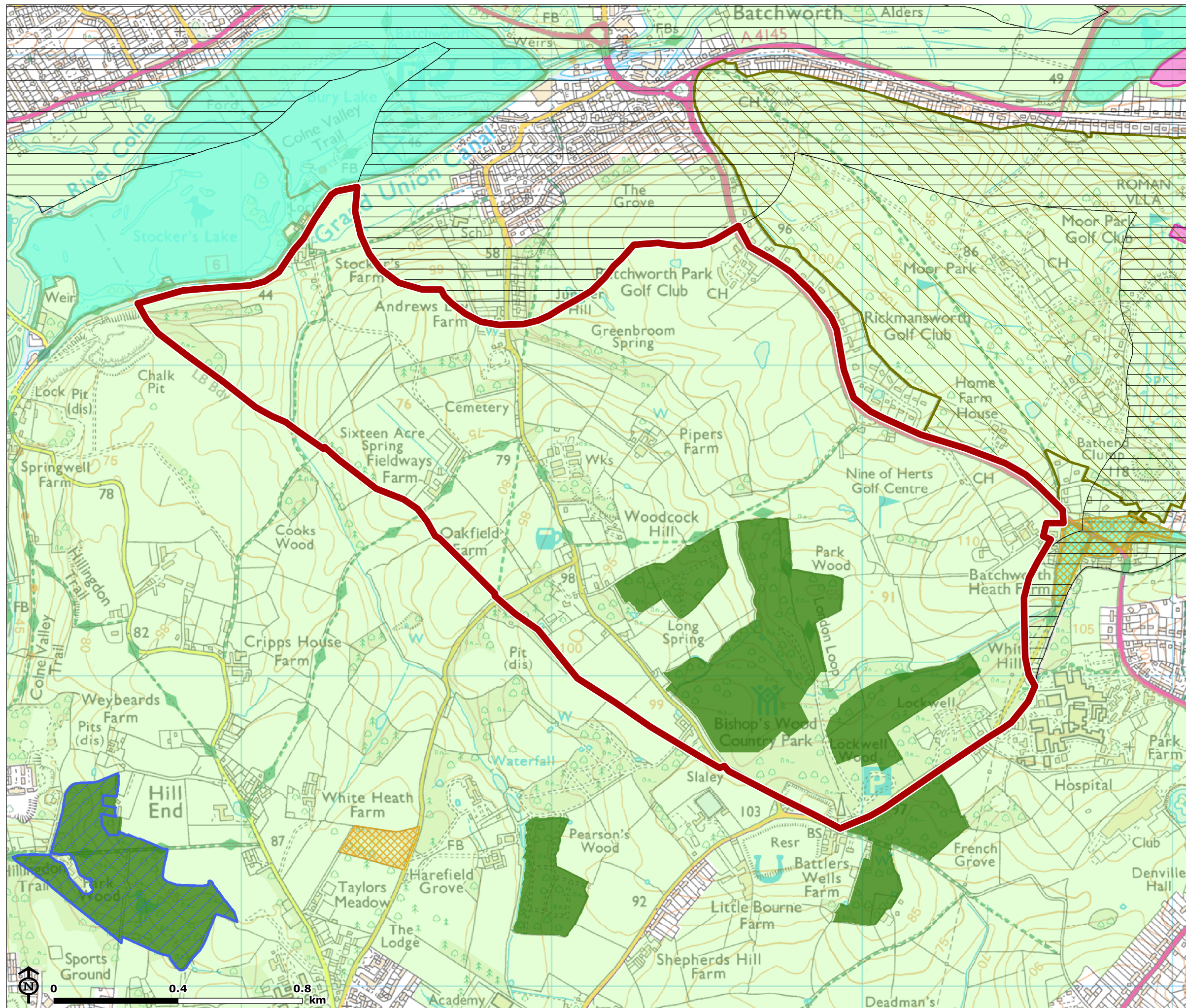
Impact on adjacent Green Belt

- 3.9 At the southern end of the search area, release of land between the District boundary and the M25 would weaken the contribution of adjacent Green Belt to the east and west. Development to the west of the M25 would remove a key separating feature between inset development in South Bucks and Three Rivers, leaving a gap weakened by existing washed over development at Horn Hill. To the east, Green Belt land between Maple Cross and the M25 would be weakened by increased urban containment. Impact on adjacent Green Belt would therefore be **moderate**.
- 3.10 Any development north of the valley at Bottom Wood would increase containment of the remaining land in between the new inset area and the urban edge of Chorleywood, but the combination of sloping landform, vegetation on the valley floor and tree cover on the edge of Chorleywood and Heronsgate mean that development limited to the south side of the valley would retain a gap that would still make a significant contribution to preventing sprawl of the large built-

up area and encroachment on the countryside, so impact on the adjacent Green Belt here would be **minor**.

Harm of release

- 3.11 The Green Belt area which would need to be released to accommodate a new settlement includes land which makes a **significant** contribution to preventing encroachment on the countryside, a **relatively significant** contribution to preventing sprawl of the large built-up area and a **moderate** contribution to preventing the merging of towns. Release would have a **moderate** impact on adjacent Green Belt so the harm to the Green Belt of releasing this land would be **very high**.



Search Area 2 - Land south of Batchworth and west of Northwood

Area description

- 3.12 The search area is located in the Green Belt gap to the south of Batchworth, west of Northwood and north of Harefield. It is open and mostly lacking in urbanising built development, being predominantly formed by agricultural fields and golf courses (Batchworth Park and Nine of Hearts) with associated farm and clubhouse buildings. Three blocks of ancient woodland lying within the southern part of the search area are an absolute constraint to development, and some of the land around these, although not treated as an absolute constraint, is also woodland (and largely within the Bishop's Wood Country Park). There are a small number of isolated dwellings present but these do not have an urbanising influence. The District boundary forms the southern and eastern edges of the search area; to the east this is largely marked by hedgerows, which do not represent any significant distinction between the search area and similar countryside within the London Borough of Hillingdon, but to the south it runs through woodland. Washed-over residential development along Batchworth Hill reduces distinction between the existing inset settlement at Batchworth and Green Belt land along the eastern edge of the search area.

The search area (excluding constrained land) is approximately 250 hectares in size.

Contribution to the Green Belt Purposes

Purpose 1

- 3.13 The area lies just to the south of Batchworth and west of Northwood, both of which are contiguous with Greater London and so constitute part of the large built up area. A woodland belt maintains some distinction from Northwood, but given the extent of woodland in the southern part of the search area, much of which is ancient woodland, any development of 100ha would leave only a relatively small gap between either Batchworth or washed-over linear development extending out from it along London Road. Therefore the area makes a **relatively significant** contribution to this purpose.

Purpose 2

- 3.14 The area forms the majority of the Green Belt gap between the towns of Northwood and Rickmansworth. Any new development would be perceptible from the A404, the main connecting link between the two, but the presence of existing washed-over development along the A404 and existing connectivity between the towns along the A4145 limits this to a **relatively significant** contribution.

Purpose 3

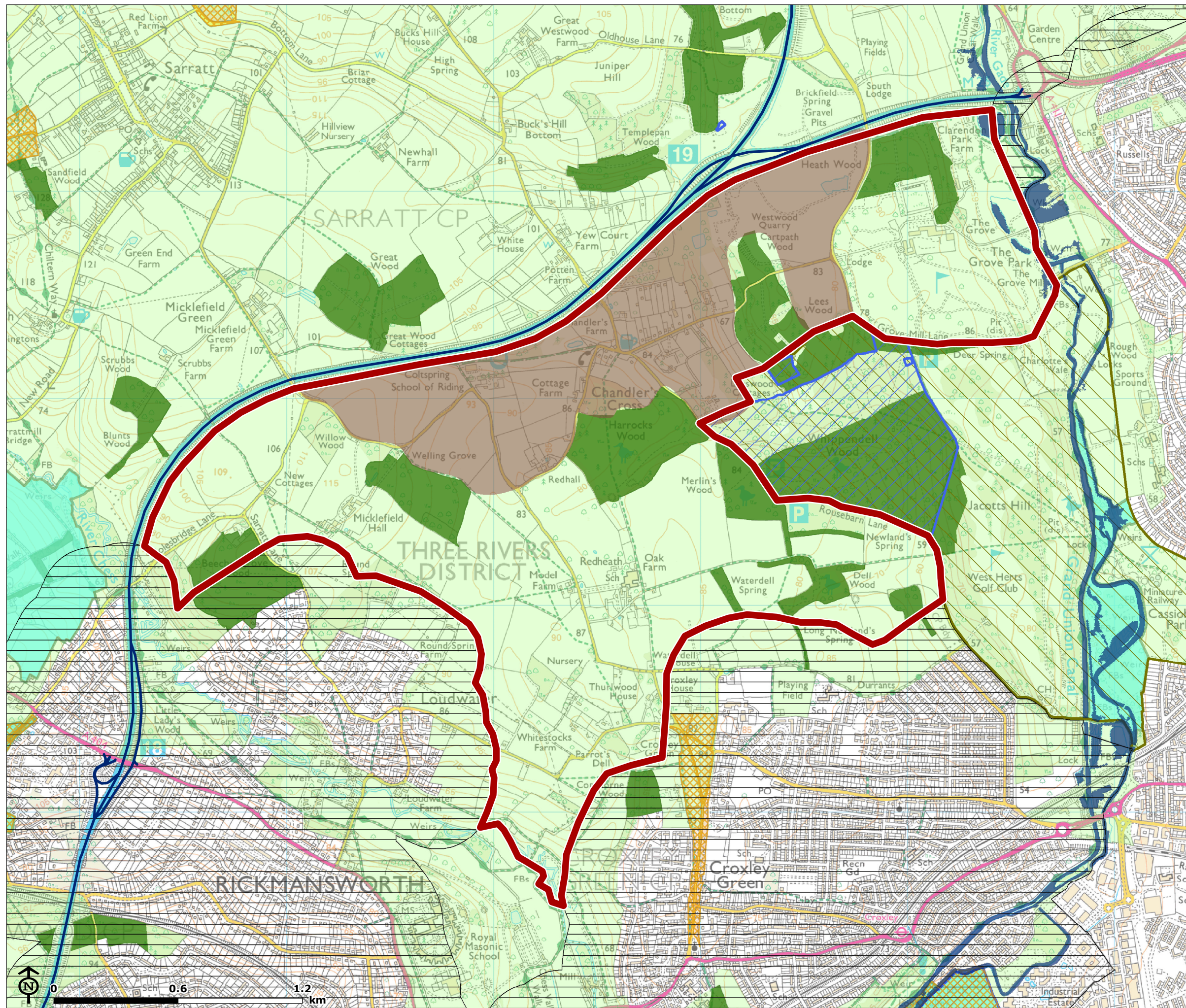
- 3.15 The land consists mainly of open farmland and golf courses. Washed-over residential development along London Road doesn't exert any significant urbanising influence over the search area, woodland helps to create distinction from Northwood, and tree cover and the slope down to the Colne Valley create distinction from Batchworth. The area maintains a strong relationship with the wider Green Belt and makes a **significant** contribution to preventing encroachment on the countryside.

Impact on adjacent Green Belt

- 3.16 Release of the area would increase containment of Green Belt land to the south east, between the new inset area and the edge of Northwood, although the woodland here would provide some distinction. Release of any 100ha within the search area would also increase containment of land remaining between the new inset area and both the urban edge of Batchworth and the washed-over development extending out from it along London Road. While land to the north east and north would also become more contained, these areas are designated as a Registered Park and Garden and Local Nature Reserve respectively which limits any impact. The woodlands in the southern part of the search area would form a strong boundary to the south, but any development extending down from high ground towards the Colne Valley would be likely to result in relatively weak inset settlement boundaries. Therefore the impact on adjacent Green Belt would be **moderate**.

Harm of release

- 3.17 The Green Belt area which would need to be released to accommodate a new settlement includes land which makes a **significant** contribution to preventing encroachment on the countryside and a **relatively significant** contribution both to preventing sprawl of the large built-up area and preventing the merging of towns. Release would have a **moderate** impact on adjacent Green Belt so the harm to the Green Belt of releasing any 100ha of land within this search area would be **very high**.



Three Rivers District

Potential Settlement Area 3

- Motorway
 - Urban Area 250m Buffer
 - Extent of search area
 - Area of minimum Green Belt harm
- Constraints**
- Flood Zone 3b
 - Local Nature Reserve
 - Registered Parks and Gardens
 - Ancient Woodland
 - SSSI
 - Common Land

Map Scale @A3: 1:18,000

LUC

Search Area 3 - Land to the north of Croxley Green and south of the M25

Area description

- 3.18 The search area is the land contained between the urban areas of Watford (to the east), Croxley Green (to the south) and Loudwater (to the west), with the M25 providing a robust boundary to wider countryside to the north. The area is predominantly open and undeveloped, formed of agricultural fields and woodlands. The latter, much of which is designated as ancient woodland, forms a north-south band which subdivides the search area. There are some clusters of washed-over development, though the dispersed nature of this limits its urbanising influence. Woodland along the slopes of the Chess Valley creates relatively strong distinction between the search area and the northern edge of Loudwater and Rickmansworth, and the River Gade, the Grand Union Canal and, further south, the Cassiobury Park Registered Park and Garden, provide a buffer to Watford to the east. However, there is no clear boundary between the search area and Croxley Green or the eastern side of Loudwater.

The search area (excluding constrained land) is approximately 540 hectares in size.

Contribution to the Green Belt Purposes

Purpose 1

- 3.19 The area lies close to Loudwater, Croxley Green and Watford which are contiguous with Greater London and so form part of the large built up area. To achieve new development encompassing 100ha of land would require development close enough to at least one of these settlements to be associated with the large built-up area. The Gade Valley watercourses and associated tree cover would retain some distinction between Watford and any development at The Grove, but the proximity of the settlement areas would be such that there would still be a **relatively significant** loss of contribution to this purpose, reducing to **moderate** to the west of Langleybury Lane. In the western part of the search area, fields between Harrocks Wood, Welling Grove and York House Wood are considered also to make a **relatively significant** contribution to Purpose 1. Land south of Welling Grove, Whippendell Woods or York House School makes, in the absence of any clear distinction from Croxley Green or Loudwater, a **significant** contribution and land to the north makes a **moderate** contribution.

Purpose 2

- 3.20 The extent of existing connectivity between Watford, Croxley Green and Rickmansworth is such that land to the north of the Chess Valley between Loudwater and Croxley Green doesn't make more than a **moderate** contribution to preventing the merger of towns. Land alongside the M25 likewise makes a **moderate** contribution to the separation between Watford and Rickmansworth along this connecting route. The area around The Grove is strongly contained by woodland to the south and west, and by the M25 slip road to the north, and so makes a **relatively limited** contribution to this purpose.

Purpose 3

- 3.21 There are no significant urbanising influences in the search area. Although contained between inset settlements and the M25, the size of the area is such that it retains a countryside character, and therefore makes a **significant** contribution to preventing encroachment on the countryside.

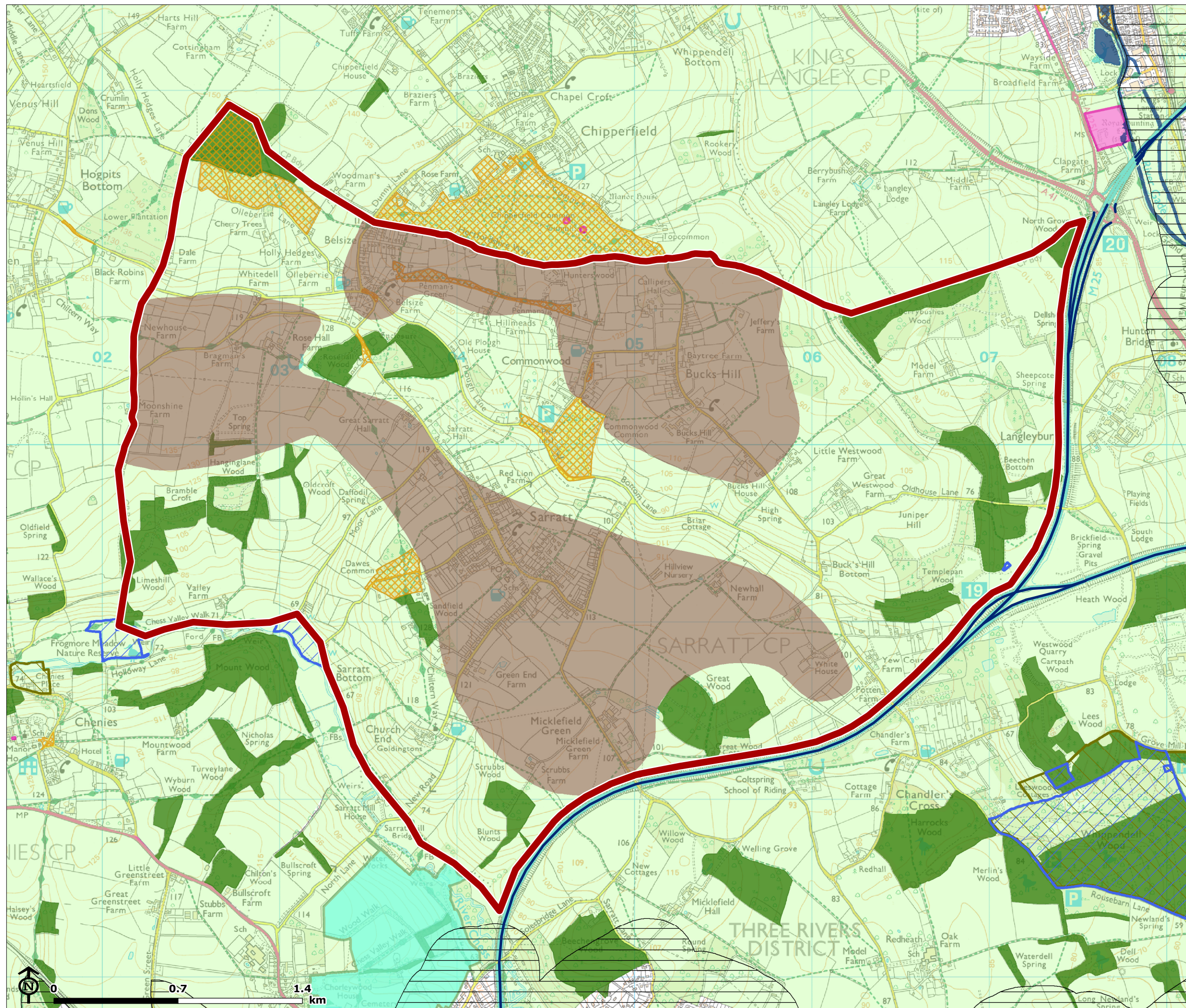
Impact on adjacent Green Belt

- 3.22 The M25 would form a strong boundary to the north, but release of any land of 100 hectares or more within the area would increase containment of remaining Green Belt land between the new settlement and Watford, Croxley Green and Loudwater respectively. The impact of development at The Grove would be significant enough to reduce the contribution of remaining land in the Gade Valley to the east to Purpose 3, and development south of Whippendell Woods, Harrocks Wood or Welling Grove would similarly increase containment of land to the south to the extent that its contribution to Purpose 3 would be weakened. Therefore the impact on adjacent Green Belt of

release of land in these areas would be **moderate**. However development that avoided encroachment east of Langlebury Lane, or south of Harrocks Wood and Welling Grove, would retain large enough areas, with strong enough boundaries, to still make a significant contribution to preventing countryside encroachment. Release of this smaller area would therefore have a **minor** impact on adjacent Green Belt land.

Harm of release

- 3.23 All of the search area makes a **significant** contribution to preventing encroachment on the countryside. Release of land at The Grove or south of between Harrocks Wood and Welling Grove would also have a **relatively significant** impact on contribution to preventing sprawl of the large built-up area, and in the latter case a **moderate** impact on preventing the merging of towns. Harm to the adjacent Green Belt of release in these areas would be **moderate**, resulting in **very high** harm to the Green Belt purposes. Containing the release of land to the area north of the aforementioned woodlands, and west of Langleybury Lane, would have the same impact on preventing settlement merger and encroachment on countryside (**moderate** and **significant** respectively) but would limit impact on preventing sprawl of the large built-up area to **moderate**, and impact on adjacent Green Belt to **minor**. This would result in **high** overall harm to the Green Belt purposes for an area of approximately 160 hectares. Existing development at Chandler's Cross would lie at the centre of a new settlement in this area, so there would be little justification for retaining its washed-over status.



Three Rivers District

Potential Settlement Area 4

- Motorway
- Green Belt
- Urban Area 250m Buffer
- Extent of search area
- Area of minimum Green Belt harm

Constraints

- Flood Zone 3b
- Local Nature Reserve
- Registered Parks and Gardens
- Scheduled Monument
- Ancient Woodland
- SSSI
- Common Land

Map Scale @A3: 1:21,000



Search Area 4 - Land around Sarratt

Area description

- 3.24 The search area lies to the west of the M25, in the westernmost corner of the District. It surrounds the washed over village of Sarratt, north of Chorleywood and Rickmansworth and west of Watford. The majority of the area is open and undeveloped and formed of agricultural fields and small areas of woodland, some of which are designated ancient woodland. There are several prominent valleys, with frequent woodland blocks, bordering and subdividing the search area, most prominently the Chess Valley to the south but also valleys extending west from the Gade Valley towards Sarratt and north west towards Chipperfield. There are a number of areas of washed-over development, including the village of Sarratt and hamlets of Common Wood, Bucks Hill and Belsize, however, these are low density and relatively open in character and so their impact on the wider area is limited. The area is separated from inset urban areas by the M25, which forms a robust boundary to the east and south east, and by the Chess Valley which, with associated woodlands, forms a strong edge to the south west. Woodlands form a significant proportion of the District boundary to the north, with Chipperfield Common providing separation between Belsize and the larger washed-over village of Chipperfield.
- 3.25 The search area (excluding constrained land and areas of washed over development, including Sarratt, Common Hill, Bucks Hill and Belsize) is approximately 1,200 hectares in size.

Contribution to the Green Belt Purposes

Purpose 1

- 3.26 Watford and Abbots Langley to the east, and Rickmansworth and Chorleywood to the south, are considered to constitute part of the large built-up area associated with Greater London; but the M25 motorway, the River Gade, the Grand Union Canal and the Chess Valley combine to create significant distinction between these settlements and the search area. Land adjacent to the M25 on the eastern fringe of the search area near Hunton Bridge, and on the southern edge in the Chess Valley south of Sarratt, is close enough to make a **moderate** contribution to preventing urban sprawl, but this diminishes with distance. The higher ground around Bucks Hill, Belsize and Commonwood has stronger separation due to intervening valleys and woodlands, and so makes only a **limited** contribution.

Purpose 2

- 3.27 The M25 along the eastern edge of the search area links the towns of Rickmansworth and Watford, but the gap here is reasonably wide and the physical features noted above provide boundaries to increase distinction between the settlements. Land adjacent to the M25 therefore makes a **moderate** contribution to preventing the merging of towns, and as with Purpose 1 this diminishes to **relatively limited** in the vicinity of Sarratt and to **limited** beyond the valleys.

Purpose 3

- 3.28 There are no significant urbanising influences in the search area, the nearby inset settlements do not contain it and the motorway and Chess and Gade valleys create distinction from urban areas. Therefore all of the area makes a **significant** contribution to preventing encroachment on the countryside.

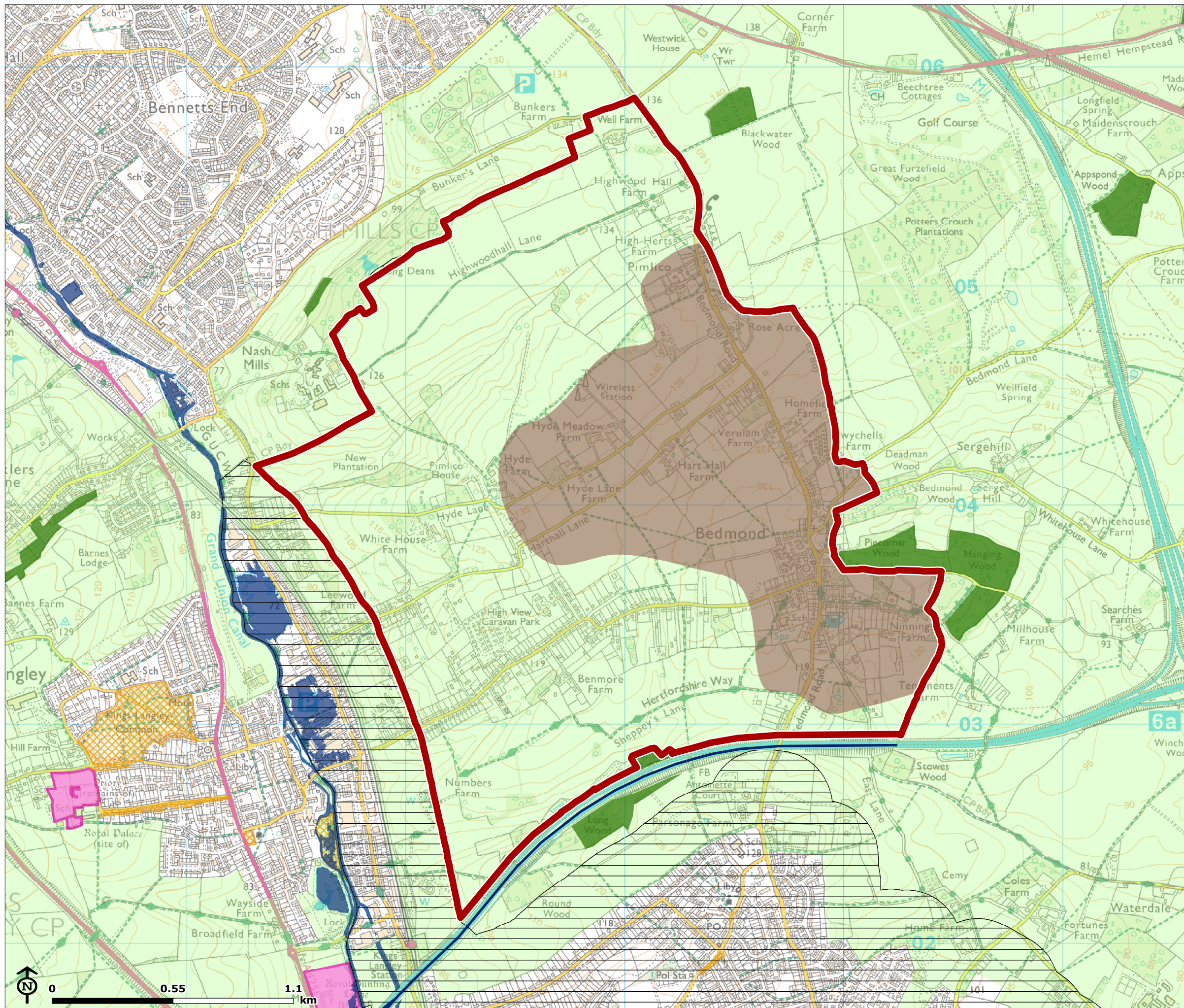
Impact on adjacent Green Belt

- 3.29 The search area is relatively large, and has strong boundary features to enhance separation from the urban settlements to the east and south, so new development that avoids the fringes where gaps to neighbouring towns are narrowest – close to Hunton Bridge (Abbots Langley) and Chorleywood – can be accommodated without causing sufficient containment to weaken the contribution of adjacent Green Belt. Any new inset area will constitute some weakening of Green Belt boundaries, but the valleys, woodlands and M25 are physical features that would form strong new boundaries, resulting in only **minor** impact on adjacent Green Belt land. A new Green Belt

boundary crossing any of these features would be weaker, resulting in a **moderate** overall impact on adjacent Green Belt.

Harm of release

- 3.30 The search area has a strong countryside character, resulting in a **significant** contribution to preventing encroachment on the countryside, so any development with a **moderate** overall impact on adjacent Green Belt would constitute **very high** harm to the Green Belt purposes. Two areas which could accommodate 100ha of new development with only **minor** impact on adjacent Green Belt, and therefore **high** overall harm to the Green Belt purposes, can be identified. These include:
- An area of approximately 160 hectares around Bucks Hill to the north of Sarratt, separated from it by the Bottom Lane / Plough Lane valley, extending west to Belsize and bound to the north by the wooded Chipperfield Common and to the east by a distinct valley.
 - An area of approximately 320 hectares adjacent to Sarratt, extending west on high ground above the Chess Valley to the south and Flaunden Lane to the north, and/or east towards the M25 but avoiding encroachment down from higher ground into the Chess Valley to the south and west, or into the Bottom Lane valley to the east. To the west there is no strong feature to define the western edge of any new development in the vicinity of the District boundary, but woodlands form an almost continuous north east to south west belt midway between Sarratt and the District boundary. To the east, the M255 and adjacent woodland would form strong boundaries, but in addition to making a **significant** contribution to preventing encroachment on the countryside, this area also makes a **moderate** contribution to preventing the merging of towns. Lack of separation from new development would weaken justification for retaining Sarratt's washed-over status.
- 3.31 Development of either of these three areas would result in a **high** harm rating, but some distinction can be drawn within this: in Green Belt terms the Bucks Hill location would have stronger boundaries than the area west of Sarratt and would have less impact on the perceived separation of towns than the area between Sarratt and the M25.



Three Rivers District

Potential Settlement Area 5

- Motorway
- Green Belt
- Urban Area 250m Buffer
- Extent of search area
- Area of minimum Green Belt harm

Constraints

- Flood Zone 3b
- Scheduled Monument
- Ancient Woodland
- Common Land

Map Scale @A3: 1:17,000

LUC

Search Area 5 - Land between Kings Langley and Bedmond

Area description

- 3.32 The search area is located in the most northerly part of the District, to the north of Abbots Langley and the M25, east of Kings Langley, south of Hemel Hempstead and west of the washed over village of Bedmond. Much of the area is open and undeveloped, being formed primarily of agricultural fields, farms and agricultural buildings, but there are also significant areas of washed-over development, principally the village of Bedmond and ribbon development spreading east from Kings Langley along Tom's Lane and, to a lesser extent, Harthall Lane and Hyde Lane. This development has an urbanising impact locally, but a limited impact on the wider area due to the screening impact of tree cover and landform, with relatively steep slopes down into the Gade Valley and smaller tributary valleys towards the western edge of the search area. A strongly defined valley runs east to west just to the north of Hyde Lane providing separation from the Green Belt adjacent to Hemel Hempstead. The M25 forms a strong boundary to the south of the area, beyond which lies a strip of Green Belt then the inset settlement of Abbots Langley, although Bedmond Road and Station Road cross the motorway to link the two areas.
- 3.33 The search area (excluding washed over development extending out from Abbots Langley and Bedmond) is approximately 530 hectares in size.

Contribution to the Green Belt Purposes

Purpose 1

- 3.34 The area lies to the east of Kings Langley which is close enough to Watford and Abbots Langley to the south to form part of the large built up area of Greater London. The railway tracks provide some distinction between the inset edge of Kings Langley and the Green Belt within the area of search, but Tom's Lane, Harthall Lane and Hyde Lane and washed over development along them provide linking features which are already subject to sprawl. Release of any land which would be in close proximity to these areas of washed over development would therefore be associated with Kings Langley and extend this sprawl. There is only a narrow gap between Bedmond and development along Tom's Lane, so any 100ha development will encroach on land making a **relatively significant** contribution to this purpose.
- 3.35 Woodland and a prominent ridge create separation from the large built-up area of Hemel Hempstead to the north of the search area, but land in the north of the area is close enough to make at least a **moderate** contribution to this purpose.

Purpose 2

- 3.36 The area of search lies between the towns of Watford and Hemel Hempstead, but the M25 provides a robust boundary feature and the contribution of the southern half of the area is limited by the presence of existing washed over development, in particular along Toms Lane. Furthermore the towns are already almost linked by inset and washed over development along the Gade Valley at Kings Langley to the west. Therefore, the contribution of the area to preventing the merging of towns is **moderate**.

Purpose 3

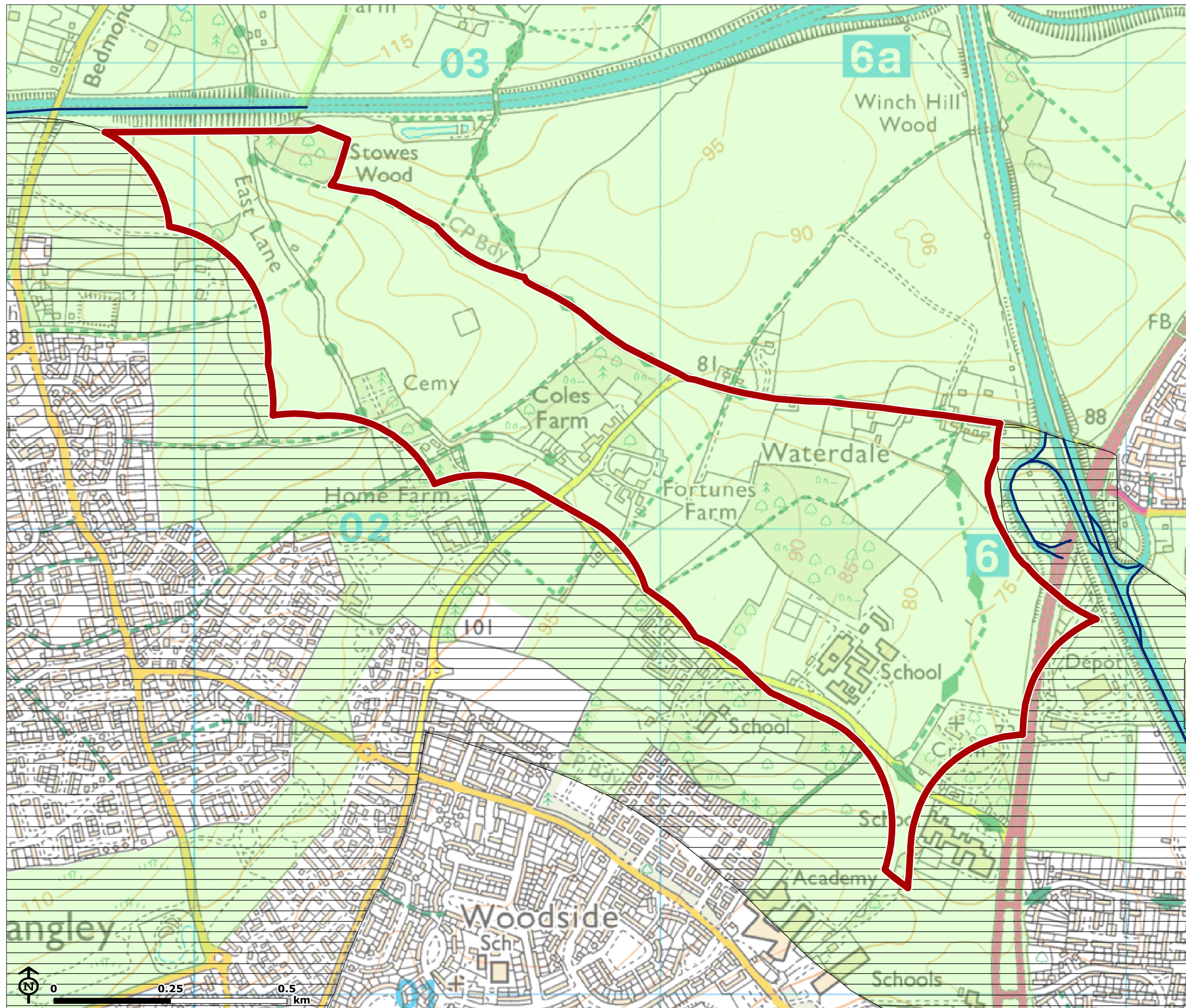
- 3.37 As concluded in the Stage 2 study, existing development in Bedmond has a significant impact on Green Belt openness. Beyond this, the area of land immediately adjacent to the village, and land in the vicinity of Tom's Lane and the other roads extending out from Kings Langley, is subject to some urbanising influence and containment and therefore makes a **relatively significant** contribution to preventing encroachment on the countryside.
- 3.38 There is little urbanising development in the centre and north of the area and along the southern edge, and these areas are large enough for the nearby inset settlements not to contain or isolate them. Therefore the remainder of the area makes a **significant** contribution to this purpose.

Impact on adjacent Green Belt

- 3.39 Any development in the vicinity of the existing washed-over development in the western part of the search area would contain and weaken any remaining Green Belt land in this area, limiting the extent to which a new settlement would be perceived as distinct from Kings Langley. North of Hyde Lane a well-defined and undeveloped tributary valley retains clear distinction from the higher ground to the east. Any development encroaching on this valley, which is visible in views across the Gade Valley, would likewise significantly increase containment of any remaining land and remove distinction with the urban edge of Kings Langley. Land to the north of the tributary valley is also considered to be close enough to Hemel Hempstead for release to weaken the contribution of remaining land (in Dacorum Borough) between Hemel and the new settlement.
- 3.40 Although any new inset development will represent some degree of Green Belt boundary weakening, around Bedmond, this is offset to a degree by the extent of existing urbanising washed-over development blurring the distinction between settlement and countryside. There would be no increased containment of Green Belt land in St Albans District. Therefore the impact on adjacent Green Belt of development which is restricted to the higher ground around Bedmond, and which does not extend north of the tributary valley, would be **minor**, whereas development extending further north or west would increase harm to either **moderate** or **significant**.

Harm of release

- 3.41 The Green Belt area which would need to be released to accommodate a new settlement includes land which makes a **significant** contribution to preventing encroachment on the countryside and a **relatively significant** contribution both to preventing sprawl of the large built-up area and preventing the merging of towns. A release confined to the higher ground (an area of approximately 180 hectares) around and principally to the north of Bedmond would have a **minor** impact on adjacent Green Belt so the harm to the Green Belt purposes would be **high**. Any development further north or west would increase impact on the adjacent Green Belt to at least **moderate**, and overall harm to **very high**.



Three Rivers District

Potential Settlement Area 6

- Motorway
- Green Belt
- Urban Area 250m Buffer
- Extent of search area

Constraints

- Flood Zone 3b

Map Scale @A3: 1:8,000

LUC

Search Area 6 – Land to the north east of Abbots Langley and Watford

Area Description

- 3.42 The search area is located along the north western edge of the District with Abbots Langley and Watford to the south west and the District boundary to the north and east. The M25 runs along the northern edge of the area. The area is predominantly open and undeveloped, formed mainly by agricultural fields and woodland blocks. There are a small number of isolated washed over dwellings in the area which do not exert an urbanising influence, and a school which has a limited urbanising influence on the land in the immediate vicinity. The M25 forms a robust boundary to the north but there is limited distinction with the Green Belt to the north and the inset settlement edges of Abbots Langley and Watford to the south west.
- 3.43 The entire search area is only 100 hectares in size and so the whole area would need to be released in order to accommodate a new settlement.

Contribution to the Green Belt purposes

Purpose 1

- 3.44 The search area is located on the edge of Watford and Abbots Langley which form part of the large built up area of Greater London. There is little distinction from the inset urban edges and therefore the land makes a **significant** contribution to preventing urban sprawl.

Purpose 2

- 3.45 The search area lies between the towns of Watford and St Albans where the inset settlements of Bricket Wood and Chiswell Green narrow the gap between the towns, and where the A405 provides a connecting feature. However, the gap just to the east is narrower which limits the contribution of the area to **moderate**.
- 3.46 The western half of the area is located further from this gap and therefore the contribution would be more limited here.

Purpose 3

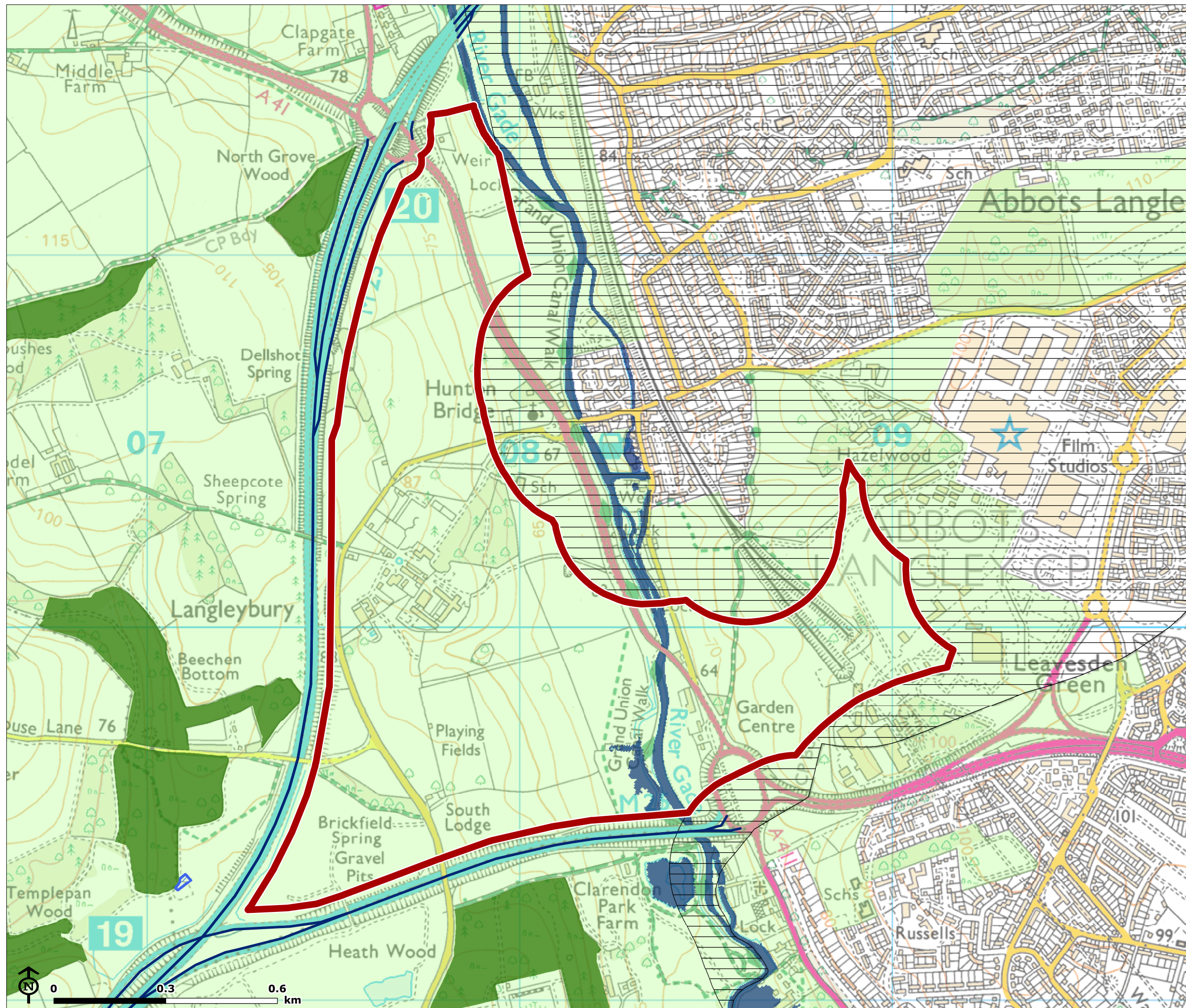
- 3.47 Other than the school, which only has a very localised impact, there are no significant urbanising influences within the search area and the nearby inset areas do not contain or isolate it. Therefore, the area makes a **significant** contribution to preventing encroachment on the countryside.

Impact on adjacent Green Belt

- 3.48 In order to accommodate a new settlement of 100 hectares or more, the entire search area would need to be released. While the M25 along the northern edge of the area and A405 to the east of the area provide robust boundaries, release of this area would significantly increase the containment of the land which would remain between the existing inset urban edge and the new inset area. Chequers Lane would form a clear inset settlement boundary along the District border, but this would nonetheless result in some weakening of the integrity of the remaining Green Belt land in St Albans contained between the new settlement, the M1 and the M25. Release of this area would therefore have a **moderate** impact on adjacent Green Belt land.

Harm of release

- 3.49 The search area makes a **significant** contribution to preventing urban sprawl and encroachment on the countryside and a **moderate** contribution to preventing the merging of towns. It would have a **moderate** impact on adjacent Green Belt and therefore, the harm of releasing it would be **very high**.



Three Rivers District

Potential Settlement Area 7

- Motorway
- Green Belt
- Urban Area 250m Buffer
- Extent of search area

Constraints

- Flood Zone 3b
- Ancient Woodland
- SSSI

Map Scale @A3: 1:10,000

LUC

Search Area 7 – Land to west of Abbots Langley and Watford

Area Description

- 3.50 The search area is located towards the north of the District just to the east of Abbots Langley and Watford with the M25 forming the western and southern boundaries. It is predominantly open and undeveloped, formed largely of agricultural fields, some playing fields and a couple of small woodland blocks. There are a couple of isolated dwellings within the area and Home Farm lies in the centre however, these do not have an urbanising influence. The south western corner of the area includes part of the washed over edge of the Levesden studios site, and this area, and an area to the north crosses the A41 which, along the River Gade and Grand Union Canal provides distinction from the inset urban edge. The M25 provides a robust boundary to the west and south.
- 3.51 The area is 145 hectares in size, but it is noted that an area of more than 100 hectares could be accommodated within the search area to the west of the A41 and River Gade.

Contribution to the Green Belt purposes

Purpose 1

- 3.52 The search area is located to the west of Watford and Abbots Langley, which form part of the large built up area of Greater London. However, the River Gade and Grand Union Canal, and the A41 provide some distinction from the urban edge, limiting the contribution of the area to **relatively significant**. It is noted that the eastern edges of the search area, to the south towards Levesden studios breach these boundaries and extends into an area which has little distinction from the inset edge, making the contribution of this area **significant**.

Purpose 2

- 3.53 The search area lies next to, and also spans almost all of the gap between, Abbots Langley and Watford. Abbots Langley in turn is almost contiguous with Kings Langley and then Hemel Hempstead to the north. Furthermore, it lies along the linking features of the M25 and A41. Given the extent of existing connectivity between towns, the contribution of the area to this purpose is **relatively significant**.

Purpose 3

- 3.54 There are no significant urbanising influences to the west of the A41 within the search area, and it is uncontained by existing inset settlements, with distinction from them provided by the River Gade and the A41. Therefore, it makes a **significant** contribution to preventing encroachment into the countryside. The contribution of the area to the east of the A41 is more limited due to existing containment by the inset area and the urbanising influence of the film studios.

Impact on adjacent Green Belt

- 3.55 Any remaining Green Belt between Abbots Langley and Watford, or between the new settlement and the M25, would be very contained and therefore make a significantly weakened contribution to Green Belt purposes. The River Gade corridor would not provide sufficient strength of separation for a new inset area to constitute a separate settlement, rather than an expansion of Abbots Langley. However the area is strongly contained by the M25 to the west and south, which places a limit on overall harm to Green Belt purposes. Therefore the impact of release on adjacent Green Belt land would be **minor**.

Harm of release

- 3.56 The Green Belt area which would need to be released to accommodate a new settlement includes land which makes a **significant** contribution to preventing encroachment on the countryside and a **relatively significant** contribution both to preventing sprawl of the large built-up area and preventing the merging of towns. There would be a **minor** impact on the adjacent Green Belt, resulting in **high** overall harm to the Green Belt purposes, but any development here would weaken the role of remaining Green Belt between a new inset settlement and Abbots Langley to the extent that the two would not be perceived as distinct, separate settlements.