

St Albans City and District Local Plan

Statement

Stage 1 Matter 3

On behalf of

The Trustees of the Shonleigh Trust

Land Park Street Lane, How Wood.

(Reg 19 Sub 100)

1) This statement should be considered in conjunction with the Reg 19 Sub 100 with its attached appendices. Since the Reg 19 submissions, the NPPF (Dec 2024) has been published, which introduces Grey Belt, however, the Council has submitted the Local Plan for Examination in time for the transitional arrangements to apply.

2) Our clients site the field north of the M25 comprises 2.26 hectares, however given earlier studies the land previously recommended only comprised the northern part of the field which is 1.2 hectares and this was shown coloured pink in Reg 19 Appendix 1. In view of the Park Street Lane buffer of mature trees and the other landscape root protection areas, the area of the site capable of development is less than 1.0 hectare. This is important in view of other representors statements regarding the deficiency in identifying sites in accordance with Para 70 of the Framework.

3) There is an overlap with Matter 2 regarding the Site Selection Methodology as the Pro Forma refers to the Green Belt Study within its overall site analysis.

4) Before dealing with the Questions raised, we wish to review the 5 purposes for including land in the Green Belt specifically in relation to our clients land. The NPPF (2023) Para 143 lists to 5 purposes :-

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

5) The land is restricted and contained by housing and substantial infrastructure comprising the M25 and the railway.

b) Prevent neighbouring Towns for merging into one another

6) How Wood is not a Town. Criteria b) is specific to Towns, see Government Planning Guidance Green Belt (Feb 2025) (**Appendix 1**), where it refers Purpose B “*relates to the merging of towns, not villages*”.

c) Assisting safeguarding the countryside from encroachment

7) Given the severance by the M25, the railway line and the How Wood settlement boundary this is a small contained area of countryside. Its development would still preserve and safeguard the remainder of the countryside. The site has very firm physical infrastructure boundaries which safeguards the open countryside beyond.

d) Preserve the setting and special character of historic towns.

8) There are no historic towns which are within 4 kilometres of the site.

e) Assist in the urban regeneration, by encouraging the recycling of derelict and other land

9) Given the high property values, the market forces have already eked out any available land. Industrial and other areas have been re developed, in the main for residential purposes. The Councils own evidence shows very limited opportunities within the urban area or previously developed land. In any event this was not an assessed criteria in the Green Belt Study

10) In summary the site does not perform well in meeting the Green Belt purposes.

Issue 2 Green Belt Review

Q3 Is the methodology by which sites have been assessed in stage 2 Green Belt Review sufficiently robust and transparent to support the proposed boundary revisions? If not, what approach should have been used and why ?

11) If the ultimate Green Belt Review results in inconsistencies and errors, then it is questionable whether it is robust and transparent. This can be judged by reviewing the outcomes.

12) Site SA-126, identifies Purpose 2 incorrectly referring to How Wood and Bricket as neighbouring built up areas, whereas Purpose 2 is related to specifically Towns, see above. Having identified that the site does not serve Purpose 1, it does not serve Purpose 2, it does not serve Purpose 4 or 5. That leaves the only issue, to what extent it serves Purpose 3 and what weighting should be applied. As indicated above the site is severed from the wider countryside. The SHLAA Assessment (**Appendix 2**) whilst analysing Green Belt in particular would development result in unrestricted sprawl of large built up areas, under the Stage 1 process the Officers recommendations were *"the northern half of the site is bounded by existing residential development to the north and west and its development would not have the same impact as described above."* The Aecom report commissioned by St Stephen P.C. for the purposes of the Neighbourhood Plan, refers that the northern part of the field, as *"an appropriate site to put forward as proposal for housing"*. The Councils Arup Green Belt Study does not undertake make a comparative exercise. Though it would be reasonable to expect that Arup would have been informed and made aware of past reports.

13) It is appropriate to then consider our clients site against the Arup recommendations for Green Belt release, this is best achieved by reviewing the proforma for our client's site (**Appendix 3**) with the attached sites in **Appendix 4** , comprising SA-9, SA-17, SA-32, SA-53, and SA-55. In each case it is my view these sites perform more strongly in serving the Green Belt purposes than our client's land. SA-9 was not carried forward in the Site Selection. SA-17 in part is a Site Selection. SA-32, SA-53 and SA-55 are all selected Sites. It should be noted that the assessments indicated a number played an important role in respect of the strategic parcel, but if released, unlikely to significantly harm the performance of the wider Green Belt.

14) It should also be noted that the site Land at Orchard Drive , How Wood (Site Ref C-208. HELLA STS-29-21, Green Belt Study SA-133 (**Appendix 5**), was similarly not recommended in the Green Belt Study (June 2023), but had been granted residential planning permission by the Council in June 2022. A review of this sites characteristics in comparison with other sites which were recommended, again brings into question the robustness of the Green Belt evidence.

Q4 How did the evidence in Stage 2 Green Belt Review inform decisions about which site to allocate ?

15) In respect of our client's site, it was an important factor as the Site Selection Qualitative Assessment starts "The site is not recommended for further consideration by the Green Belt Review Stage 2 Report". The fact that the Site Selection Pro forma has errors has also contributed to a wrong outcome, but that is dealt with in Matter 2 Issue 5.

Appendix 1

Guidance

Green Belt

Advice on the role of the Green Belt in the planning system.

From: **Ministry of Housing, Communities and Local Government**
(/government/organisations/ministry-of-housing-communities-local-government),
Ministry of Housing, Communities & Local Government (2018 to 2021)
(/government/organisations/ministry-of-housing-communities-and-local-government-2018-2021) and **Department for Levelling Up, Housing and Communities**
(/government/organisations/department-for-levelling-up-housing-and-communities)

Published 22 July 2019

Last updated 27 February 2025 —

Contents

- Scope of guidance
- Assessing Green Belt to identify grey belt land
- Considering the impact on the remaining Green Belt in the plan area
- Proposals on grey belt land
- Identifying sustainable locations
- Golden Rules
- Considering the potential impact of development on the openness of the Green Belt

Scope of guidance

This guidance sets out:

Contribution	Illustrative features
	<ul style="list-style-type: none"> - be adjacent or near to a large built up area - if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	<p>Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to):</p> <ul style="list-style-type: none"> - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or None	<p>Assessment areas that make only a weak or no contribution are likely to include those that:</p> <ul style="list-style-type: none"> - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Purpose B – to prevent neighbouring towns merging into one another

This purpose relates to the merging of towns, not villages.

Contribution	Illustrative Features
Strong	<p>Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features:</p> <ul style="list-style-type: none"> - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns
Moderate	<p>Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to):</p> <ul style="list-style-type: none"> - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures,

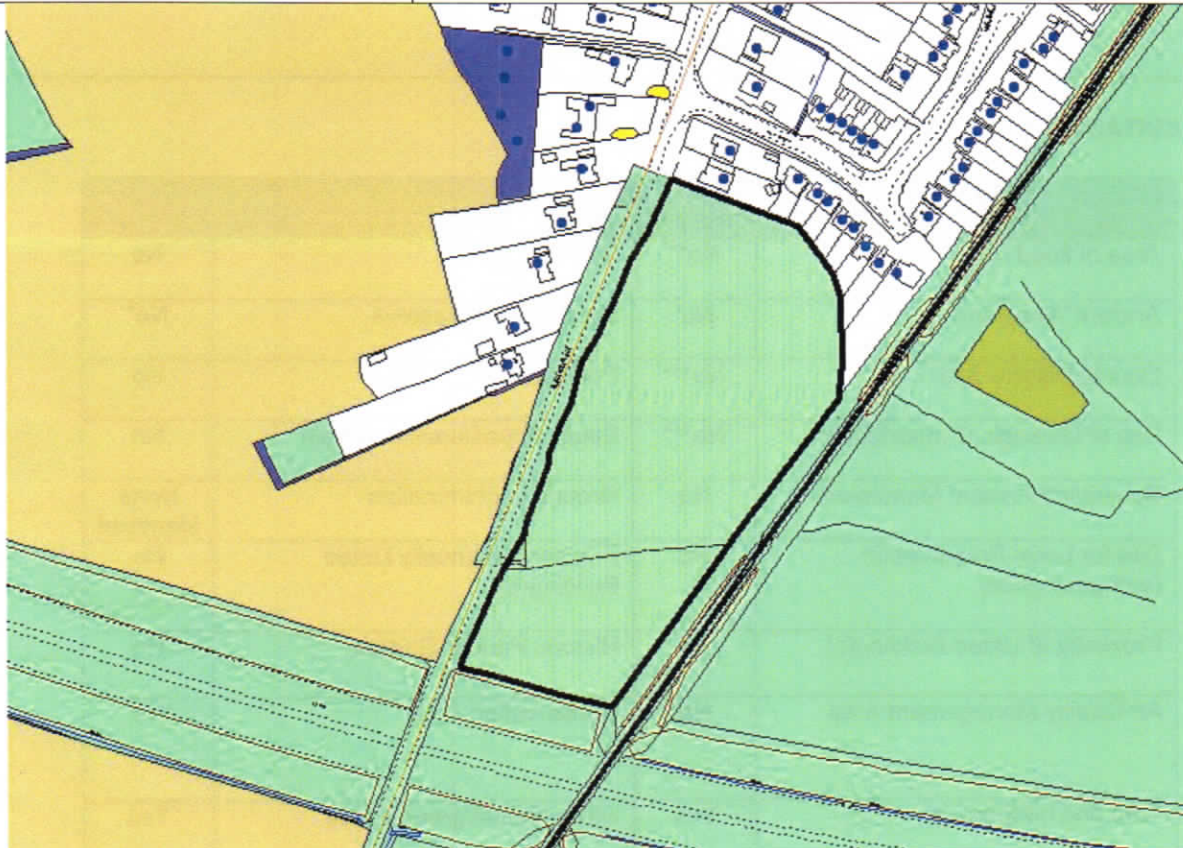
Appendix 2

SHLAA ASSESSMENT FORM – GREEN BELT SITES

STAGE 1

SITE CHARACTERISTICS AND GENERAL INFORMATION

Unique Site Reference	SHLAA-GB-HW-193
Site address (or brief description of broad location)	Land south of How Wood adjacent to Park Street Lane, railway line and M25



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Ownership details - including whether freehold or lease and length of lease (if applicable)	TBC
Contact details - if different from above (e.g. agent, planning consultant etc)	Derek Bromley Faulkners
Area of site or broad location (hectares)	2.3 hectares
Category of site (e.g. agricultural etc)	Greenfield
Current use(s)	None – vacant land

Character of surrounding area (including adjoining land uses; site outlook etc)	Site is long and relatively narrow, bordering residential development immediately to the north. The M25 runs to the south of the site, with a railway line to the east and Park Street Lane to the west. The site is overgrown with some scrub/vegetation and has a heavily treed border, particularly towards the north west.
Method of site identification (e.g. proposed by landowner etc)	Looked at as part of the Green Belt Boundary Study 2003 (and representations made on this site as part of the Local Plan Second Review in 1999).
Planning History (including Local Plan Inquiries, LDF etc)	None relevant

SITE SUITABILITY

Physical Constraints			
Area of flood risk	No**	SSSI	No
Ancient Woodland	No*	Local Nature Reserve	No*
County Wildlife Site	No***	Poor access	No
Site of Geological Importance	No***	Steep slopes/uneven terrain	No
Scheduled Ancient Monument	No	Ground contamination	None identified
Site for Local Preservation (archaeological)	No	Proximity of Locally Listed Building(s)	No
Proximity of Listed Building(s)	No	Historic Park or Garden	No
Air Quality Management Area	No	Conservation Area	No
Tree and hedgerows	Yes	Other habitat/green space	Yes
Proximity to Hazardous Installations (as per Policy 84b)	No	Public Right of Way	No
		Utilities – e.g. electricity substations, pylons, telecom masts, underground pipelines, sewers etc	None identified
Minerals and waste site (i.e. development would result in the sterilisation of mineral reserves)	No	Site is adversely affected by noise, air or other forms of pollution (e.g. major roads etc)	Yes****
Development would cause demonstrable harm to the character and amenity of surrounding areas/land uses	Possibly	Development would involve land that could otherwise help to meet the objectives of Watling Chase Community Forest	Yes

Development would result in unrestricted sprawl of large built up areas.	Yes	Scale and nature of development would be large enough to significantly change size and character of the settlement.	Perhaps
Development would result in neighbouring towns merging into one another.	Yes	Development would result in encroachment into open countryside.	Yes
Development of the site would affect land that is presently rural rather than urban in nature	Yes	Development would be visually intrusive from the surrounding countryside	Marginal
Development would assist in urban regeneration by encouraging the recycling of derelict and other urban land.	No	Existing Green Belt boundary is well defined	Yes
Removal of the site from the Green Belt would create additional development pressure on adjoining land	No	Release of the site from the Green Belt would create a more clearly defined, robust long term boundary	No
Development would affect the setting and special character of St Albans (i.e. the Ver Valley to the south & west of the City); Harpenden (i.e. the southern approach across the Common); or the historic centres of Redbourn or Wheathampstead			No
Comments/observations (including details of other physical constraints or site designations) * Site lies adjacent to Blackgreen Wood (Ancient Woodland and Wildlife Site) to the south west. ** Site lies adjacent to (but not within) floodplain. *** Site lies adjacent to Moor Mill and Park Street Pits (a protected species site, geological SSSI and County Wildlife Site). **** Southern part of the site abuts the M25 motorway. * Ecology Database site 76/057			
Policy Constraints			
Loss of high quality agricultural land (Grades 1,2 or 3a)	Grade 3	Green spaces identified for protection in the Green Spaces Strategy	No
Landscape Character Area - i.e. those areas where emphasis is on conservation (NB: Local Plan still refers to Landscape Conservation Areas)	Yes HCC Area 18	Site with social or community value (provide details)	No
Tree Preservation Orders	No	Greenfield site	Yes
Comments/observations (including details of any other national, regional or local policy constraints):			

Can any of the physical or policy constraints identified above, be overcome or could mitigation measures be introduced to reduce any potential impacts identified?	<p>Development on all of this site would significantly contribute to the visual and (to a lesser extent) physical coalescence of How Wood and Bricket Wood. Development would also result in encroachment into open countryside and would affect land that is rural rather than urban in nature.</p> <p>The southern part of the site is also in close proximity to the M25 and suffers from air and noise pollution.</p>
<p>Officers Conclusions - Stage 1</p> <p>(i.e. should this site be given further consideration for housing development? If no, provide reasons)</p>	<p>Yes.</p> <p>Development on all of this site would significantly contribute to visual and (to a lesser extent) physical coalescence of How Wood and Bricket Wood. Development would also result in encroachment into open countryside and would affect land that is rural rather than urban in nature. The southern part of the site is also in close proximity to the M25 and suffers from air and noise pollution.</p> <p>However, the northern half of the site is bounded by existing residential development to the north and west and its development would not have the same impact as described above.</p>

STAGE 2

AVAILABILITY FOR HOUSING

Is the site considered available for development?	Yes. Site put forward by an agent on behalf of the owner in the past and is believed to still have an active interest in pursuing development on this site.
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ACHIEVABILITY FOR HOUSING

Is there a reasonable prospect that housing will be developed on the site?	<p>Yes, after due consideration through the LDF process, given the site's location in the Green Belt, on the edge of the specified settlement of How Wood.</p> <p>Opportunities for a carbon-offset scheme through tree planting may be possible.</p>	
Likely timeframe for development (i.e. completion)	2009-2011	
	2011-2016	Yes
	2016-2021	
	2021-2026	

ESTIMATING HOUSING POTENTIAL

CAPACITY ASSUMPTIONS

Assuming the southern approximately 'half' of the site is retained as a natural buffer against the M25 and most of the existing screening around the site perimeter is also retained. The rest of the site is assumed to be developed for housing, with a mix of dwelling types appropriate to the area (principally two and three storey semi-detached and townhouses).

Approximately 35 dwellings per hectare is a reasonable estimate, on approximately just under 1 hectare of available site (out of 2.3 hectares total site area), in Zone 6.

Estimated capacity suggested by landowner/agent	
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Council's own estimated capacity	30
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IS THE SITE: DELIVERABLE; DEVELOPABLE; OR NOT CURRENTLY DEVELOPABLE; FOR HOUSING?

Deliverable	Yes
Developable	
Not Currently Developable	

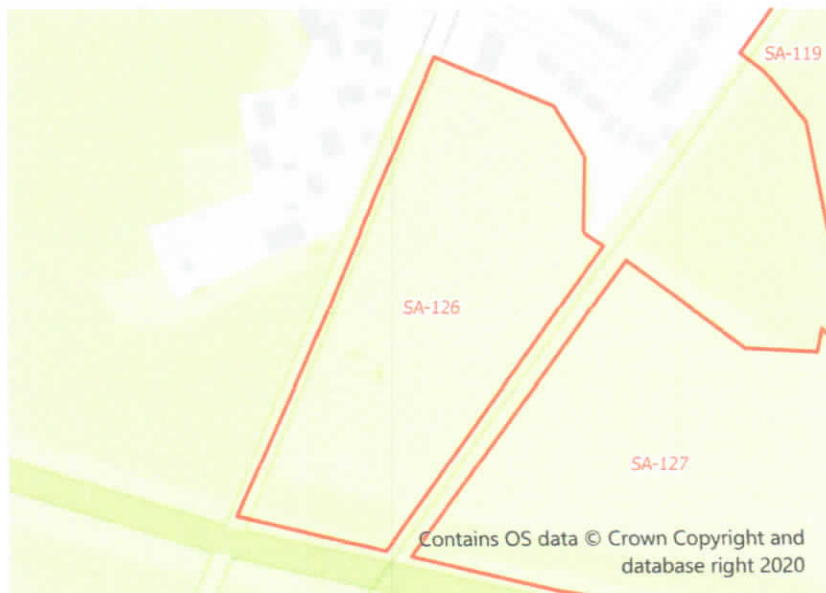
Appendix 3

Sub-area (SA): SA-126

Strategic Land Parcel: 26

Area (ha): 2.76

Location South of How Wood



Sub-area map



Looking east from west boundary with views through tree lines towards open agricultural fields



Looking west from south-west corner of sub-area with views of open agricultural fields



Aerial photography used as a result of limited access to and / or views of sub-area at the time of the site visit (Bing Aerial, September 2021).

Boundaries

The sub-area is bounded by regular backs of residential properties and gardens along Maplefield to the north, the railway to the east, the M25 to the south and Park Street Lane to the west. Inner boundaries: north. Outer boundaries: east, south and west.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	1	5	0
	No	0			

Purpose (1) To check the unrestricted sprawl of large built-up areas

(a) Land parcel is located at the edge of a discrete built-up area The sub-area is not at the edge of a large built-up area, in physical or perceptual terms.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary. The sub-area does not meet purpose 1.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas. The sub-area forms a less essential part of the gap between How Wood and Bricket Wood. Due to the presence of the M25, perceptual merging of the neighbouring built-up areas of How Wood and Bricket Wood would be limited. It is judged that the gap is of sufficient scale, that the removal of the sub-area would not result in physical or perceptual merging between neighbouring built-up areas.

Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development. Approximately 3% of the sub-area is covered by built form. Built form is limited to a single outbuilding towards the south part of the sub-area. The rest of the sub-area comprises open fields with paddocks and meadow. Through the tree line along Park Street Lane on the west boundary, there are limited views to the built area of How Wood.

Although the sub-area is adjacent to a railway to the east and the M25 to the south, there are negligible visual links to these features. Overall the sub-area has a strongly unspoilt rural character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.

The sub-area does not abut an identified historic place or provide views to a historic place and does not meet this purpose.

Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purposes 1 criteria (a) or 4, and performs weakly against purpose 2 and strongly against purpose 3.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	26	Limited or No Contribution	Partial	Limited or No Contribution	Limited or No Contribution

Assessment of wider impact

At the more granular level, the sub-area performs similarly against purposes 1 and 4, and plays a greater role against purpose 3 while it plays a lesser role against purpose 2 compared to the strategic land parcel. Neither the sub-area nor the strategic land parcel adjoin large built-up area, and hence make no contribution to preventing outward sprawl. Due to the small scale nature of the sub-area compared to the strategic parcel, it plays a lesser role in preventing settlements from coalescing. The sub-area has a strongly rural character despite its location immediately adjoining the built-up area and being bounded by the railway and M25 which have urbanising influences. As the sub-area does not abut an identified historic place or provide views to a historic place, it makes no contribution to preserving a historic context.

The sub-area adjoins SA-127 to the east, as well as wider Green Belt to the west and south. The removal of the sub-area in isolation is likely to impact on the performance of Green Belt to the south by strengthening its role in preventing the coalescence of How Wood and Bricket Wood. Despite the presence of the M25, perceptual merging between these settlements would be increased by the presence of washed over development to the north of Bricket Wood.

In combination with SA-127, the removal of the sub-area is likely to impact on the performance of the wider Green Belt, as it would lead to irregular spread of the built-up area, introducing built form to the east of the railway line, which currently acts as a readily recognisable and likely to be permanent settlement edge for How Wood.

In combination with the wider cluster of sub-areas (SA-102, SA-103, SA-112, SA-113, SA-115, SA-116, SA-117, SA-118, SA-119 and SA-127) in which the sub-area is located, the removal of the sub-area would result in extensive irregular and disproportionate sprawl of the large built-up area of St Albans and the settlement of Park Street / Frogmore. Furthermore, it would result in the merging of these settlements, as well as an erosion of the strategic gap between St Albans and Radlett.

Additionally, the removal of the sub-area would result in a narrow finger of Green Belt forming to the south of How Wood, along Park Street Lane.

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, and its release in isolation or in combination is likely to significantly harm the performance of the wider Green Belt.

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength.	The inner and outer boundaries are readily recognisable and likely to be permanent. If the sub-area was released, the new inner Green Belt boundaries would meet the NPPF definition.
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Categorisation & Recommendation

Sub-area category & recommendation	The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.
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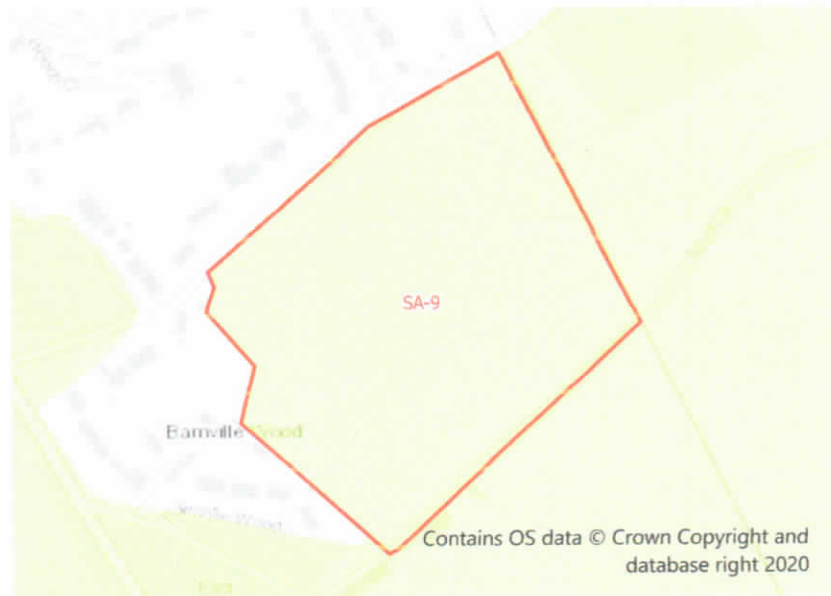
Appendix 4

Sub-area (SA): SA-9




Strategic Land Parcel: 39

Area (ha): 7.21

Location South of Harpenden



Legend

-  Sub-area for assessment
-  St Albans Green Belt
-  Neighbouring Green Belt

Sub-area map



Looking north-east from the south-west corner of the sub-area onto an arable field and residential properties



Looking north from the southern boundary of the sub-area onto an arable field and the railway line to the east



Looking west from the eastern boundary of the sub-area onto an arable field and mature tree line

Boundaries

The sub-area is bounded by Cross Lane to the north, by a rail line to the east, by Mud Lane and East Common to the south and by a mature tree line to the west. Inner boundary: north and west. Outer boundary: east and south.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	1	5	3
	Yes	5			

Purpose (1) To check the unrestricted sprawl of large built-up areas

(a) Land parcel is located at the edge of a discrete built-up area

The sub-area abuts the large built-up area of Harpenden on its northern and western boundaries.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary.

The sub-area is connected to a large built-up area. There is a prominent outer boundary feature in the form of a railway line to the east which is likely to regularise built form and prevent outward sprawl towards the east. However, this feature would not assist in restricting the scale of growth to the south. The sub-area has predominantly recognisable and likely to be permanent inner boundaries, which provide an additional barrier to sprawl.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas.

The sub-area forms a less essential part of the gap between Harpenden and St Albans. It is judged that the gap is of sufficient scale that the removal of the sub-area would not result in physical or perceptual merging between neighbouring built-up areas.

Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development.

Approximately 4% of the sub-area is covered by built form. The sub-area comprises an arable field. The built form consists of the railway line and the road which form the boundaries of the sub-area. The sub-area is enclosed by mature trees and some residential houses to the north which introduce some urbanising influences. The flat topography and the enclosed nature limit any views into wider countryside. Overall the sub-area has a strongly unspoilt rural character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	The sub-area immediately abuts the Harpenden Conservation Area to the north and west boundaries. There are occasional views from the sub-area to the historic place. There are no views from the Conservation Area to the sub-area. Overall the sub-area plays a weaker role in the maintaining the immediate context of the historic place.
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Summary

The sub-area performs strongly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area performs weakly against purpose 2, moderately against purpose 4 and strongly against purpose 3.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	39	Limited or No Contribution	Significant	Partial	Significant

Assessment of wider impact	At a more granular level, the sub-area performs a weaker role against purposes 2 and 4, but makes a more significant contribution to purposes 1 and 3 compared to the strategic land parcel. The sub-area forms only a less essential part of the gap between Harpenden and St Albans, compared to the strategic land parcel which contributes to the strategic gap to separate St Albans and Harpenden. Although the sub-area abuts the Harpenden Conservation Area, it plays a weaker role in maintaining the immediate context of the historic settlement. While the sub-area performs a more important role in restricting the sprawl of Harpenden compared to the strategic land parcel, and against purpose 3 with a strongly unspoilt rural character, its contribution is diminished due to the overall small scale of the sub-area.
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The sub-area does not abut any other sub-areas, but is surrounded by wider Green Belt to the east and south. Due to its location directly adjoining Harpenden built-up area to the north and west, its removal is unlikely to alter the performance of the wider Green Belt against purpose 3, especially as the mature tree line to the south and the railway to the east prevents longer views and connections to the wider countryside. The release of the sub-area is likely to impact the immediate context of the Harpenden Conservation Area; however, visual links are already limited by an intermittent tree line.

Summary	Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released, is unlikely to significantly harm the performance of the wider Green Belt.
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Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength.	The inner boundaries and the outer boundary to the east of the sub-area are readily recognisable and likely to be permanent. The outer boundary to the south of the sub-area is readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundary to the south would not meet the NPPF definition; however, the new inner Green Belt boundary to the east would meet the NPPF definition. The new boundary would require strengthening.
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Categorisation & Recommendation

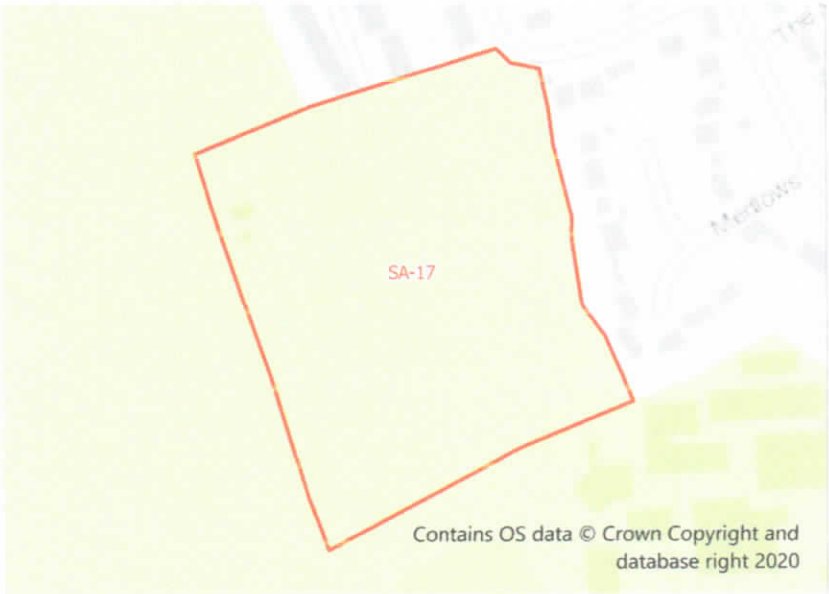
Sub-area category & recommendation	The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-5.
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Recommended Area Map



Sub-area (SA): SA-17

Strategic Land Parcel: 20 Area (ha): 4.07 Location North-west of Harpenden



Sub-area map



Looking east from the north-western boundary onto an open field, associated barn building and residential properties on the northern boundary of the sub-area.



Looking east from the south-western boundary of the sub-area onto a playing field.



Aerial photography used as a result of limited views of sub-area at the time of the site visit. (Bing Aerial, September 2021).

Boundaries

The sub-area is bounded by a intermittent tree line, the regular backs of residential property and gardens along Falconers Field and Falconers Field to the north, by an intermittent tree line and the regular backs of residential properties and gardens to the east along Medlows, by an intermittent tree line to the south and an intermittent tree line to the west, Inner boundary: north and east. Outer boundary: north, south and west.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	1	2	0
	Yes	5			

Purpose (1) To check the unrestricted sprawl of large built-up areas

(a) Land parcel is located at the edge of a discrete built-up area

The sub-area is located at the edge of Harpenden with physical connections on part of its northern boundary and the whole of its eastern boundary.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary.

The sub-area is connected to the large built-up area of Harpenden. There are no prominent outer boundary features within a reasonable distance of the sub-area which are likely to prevent the outward sprawl of Harpenden. The sub-area has predominantly recognisable and likely to be permanent inner boundaries, which provide an additional barrier to sprawl.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas.

The sub-area forms a less essential part of the gap between Harpenden and Redbourn due to its small scale. It is judged that the gap is of sufficient scale that the removal of the sub-area would not result in physical or perceptual merging between neighbouring built-up areas.

Purpose (3) To 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. However, this does not take into account the school playing fields which cover more than half of the sub-area to the south. The north of the sub-area comprises an agricultural field. The sense of openness is diminished by existing built form on the northern and eastern edge. Due to a mature tree line to the west and south the sub-area has a high level of visual enclosure with limited views to the surrounding countryside. There are some urbanising influences from the residential properties to the north and east of the sub-area. Overall, the sub-area has a semi-urban character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	The sub-area does not abut an identified historic place or provide views to a historic place and does not meet this purpose.
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Summary

The sub-area performs strongly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area does not meet purpose 4 and performs weakly against purposes 1 and 3.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	20	Significant	Limited or No Contribution	Partial	Significant

Assessment of wider impact At a more granular level, the sub-area performs similarly against purposes 1 and 2, but plays a lesser role against purposes 3 and 4 compared to the strategic land parcel. The lack of prominent outer boundary features means that the sub-area plays an important role in preventing the outward sprawl of Harpenden. Due to its very small scale and enclosed nature, the sub-area makes only a limited contribution to preventing neighbouring towns from merging. The semi-urban character of the sub-area and its limited connections to the wider countryside mean that it plays a limited role in safeguarding the countryside from encroachment. As the sub-area does not abut an identified historic place or provide views to a historic place, it makes no contribution to purpose 4 in preserving a historic context.

The sub-area does not adjoin any other sub-areas, but is surrounded by wider Green Belt to the north, west and south. Due to its location directly adjoining Harpenden to the east, its removal is unlikely to alter the performance of the wider green Belt. The mature tree line along the south and west boundaries also prevents longer views and connections to the wider countryside.

Summary	Overall, the sub-area plays an important role with respect to the strategic parcel but if released, is unlikely to significantly harm the performance of the wider Green Belt.
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Consideration of Boundaries	
Commentary on boundary features and impact on Green Belt boundary strength.	The inner boundaries are readily recognisable and likely to be permanent. The outer boundaries are readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundary would require strengthening.

Categorisation & Recommendation	
Sub-area category & recommendation	The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration as RA-14.

Recommended Area Map



Sub-area (SA): SA-32




Strategic Land Parcel: 37

Area (ha): 1.28

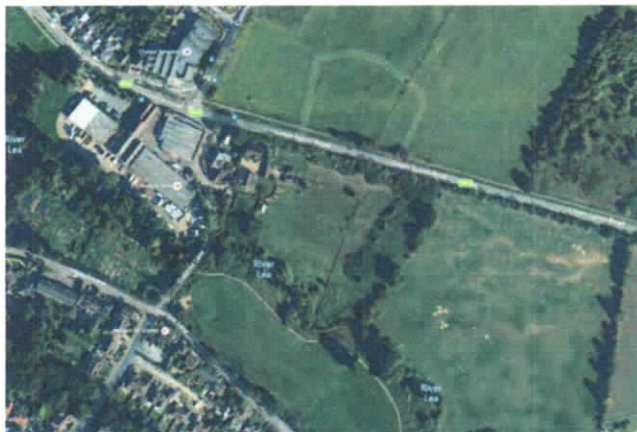
Location East of Harpenden



Legend

-  Sub-area for assessment
-  St Albans Green Belt
-  Neighbouring Green Belt

Sub-area map



Aerial photography used as a result of limited access to and / or views of sub-area at the time of the site visit. (Bing Aerial, September 2021).

Boundaries

The sub-area is bounded by Lower Luton Road (B653) to the north-east, by an intermittent tree-line to the south-east, by the policy constraint of the River Lea flood zone 3b to the south, and the irregular backs of residential properties and mature trees along Crabtree Lane to the west. Inner boundary: west. Outer boundaries: north-east, south-east and south.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	1	3	0
	Yes	5			

Purpose (1) To check the unrestricted sprawl of large built-up areas

(a) Land parcel is located at the edge of a discrete built-up area

The sub-area adjoins the large built-up area of Harpenden on its western boundary.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary.

The sub-area is connected to the large built-up area of Harpenden. There are no prominent outer boundary features within a reasonable distance of the sub-area which are likely to prevent outward sprawl. The sub-area has predominantly recognisable and likely to be permanent inner boundaries, which provide an additional barrier to sprawl.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas.

The sub-area forms a less essential part of the gap between Harpenden and Wheathampstead due to its small scale. It is judged that the gap is of sufficient scale that the removal of the sub-area would not result in physical or perceptual merging between neighbouring built-up areas.

Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development.

NOTE: Unable to access site. This assessment has been completed largely from aerial photography. Approximately 2% of the built-up area is covered by built form (excluding hardstanding). The sub-area comprises an open field and a residential property on the north bank of the River Lea. The surrounding built form and dense tree lines creates a strong sense of enclosure, which likely limits views to the surrounding countryside. Overall, the sub-area has a largely rural character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	The sub-area does not abut an identified historic place or provide views to a historic place and does not meet this purpose.
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Summary

The sub-area meets the purposes strongly overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). The sub-area does not meet purpose 4, performs weakly against purpose 2 and performs moderately against purpose 3.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	37	Limited or No Contribution	Significant	Significant	Significant

Assessment of wider impact

At the more granular level, the sub-area makes a lesser contribution to purposes 2, 3 and 4, and a more significant contribution to purpose 1 compared to the strategic land parcel. The sub-area plays an important role in preventing the outward irregular sprawl of Harpenden in the absence of other prominent features. The small scale nature of the sub-area however means the sub-area plays a lesser role in preventing the merging of neighbouring settlements compared with the strategic land parcel which plays a strong role in maintaining the strategic gap between St Albans and Harpenden. The largely rural character of the sub-area, means that it plays an important role in safeguarding the countryside from encroachment; however this is a lesser contribution than the strategic land parcel which maintains an unspoilt rural character. As the sub-area does not abut an identified historic place or provide views to a historic place, it makes no contribution to purpose 4.

The sub-area adjoins SA-29 to the north, SA-31 to the west, and wider Green Belt to the east and south. The removal of the sub-area in isolation is unlikely to alter the performance of the Green Belt to the north and west, which already has significant urbanising influences from the presence of Katherine Warington School in the south of SA-29 and commercial and light industrial land uses to the north-east of SA-31. However, its release is likely to adversely impact Green Belt to the east and south by introducing urbanising influences, although the extent of the impact would be minimised due to the degree of enclosure in the sub-area.

In combination with SA-29, the removal of the sub-areas is likely to impact on the wider Green Belt by leading to further sprawl and diminishing the sense of openness.

In combination with SA-31, the removal of the sub-areas is unlikely to impact the wider Green Belt due to the strong sense of enclosure in both sub-areas which limit any views to the wider countryside and the existing urbanising influences which diminishes the openness of the countryside. A small slither of Green Belt between the SA-31 and SA-32 would also require removal to regularise the Green Belt boundary.

In combination with other sub-areas in the wider cluster in which the sub-area is located (i.e. SA-23, SA-24, SA-25, SA-26, SA-27, SA-28, SA-29, SA-30 and SA-31), the removal of the sub-area would constitute significant sprawl of the large built-up area and an erosion of the strategic gap between Harpenden and Luton, and Harpenden and Welwyn Garden City.

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released in isolation or in combination with SA-31 is unlikely to significantly harm the performance of the wider Green Belt.

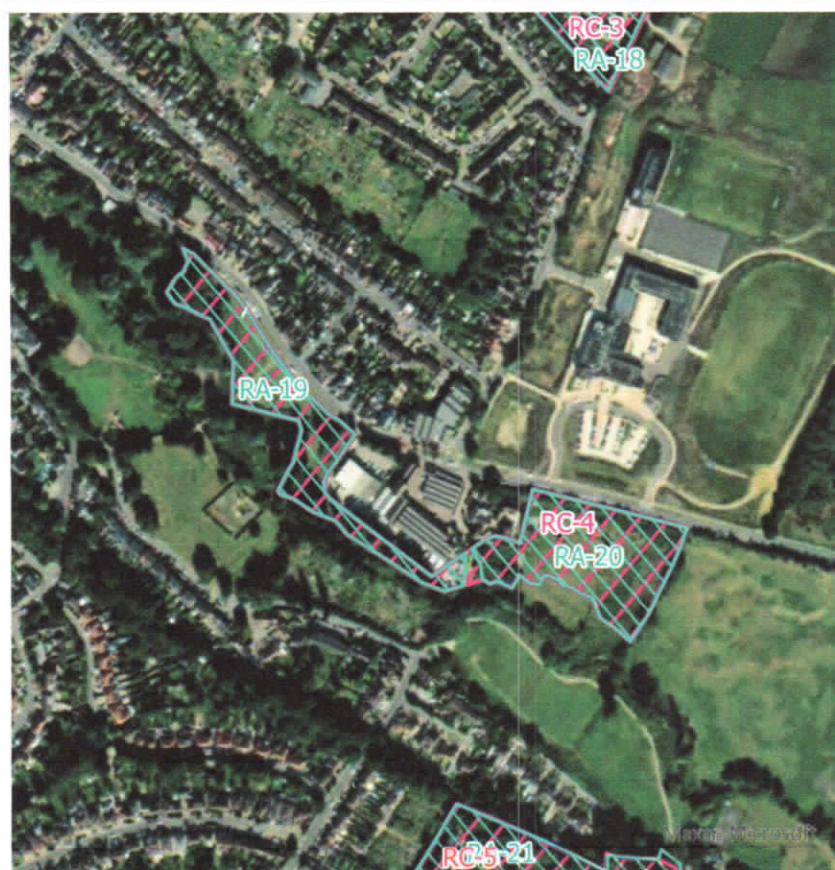
Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength.	The inner boundary is readily recognisable and likely to be permanent. The outer boundaries are predominantly readily recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundary would require strengthening.
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Categorisation & Recommendation

Sub-area category & recommendation	The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released, the new inner Green Belt boundary would not meet the NPPF definition for readily recognisable and likely to be permanent boundaries. The new boundary would require strengthening. Recommended for further consideration in isolation as RA-20 or in combination with SA-31 as RC-4.
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Recommended Area Map



- St Albans District Boundary
- Neighbouring District Boundary
- Recommended for further consideration in combination
- Recommended for further consideration in isolation

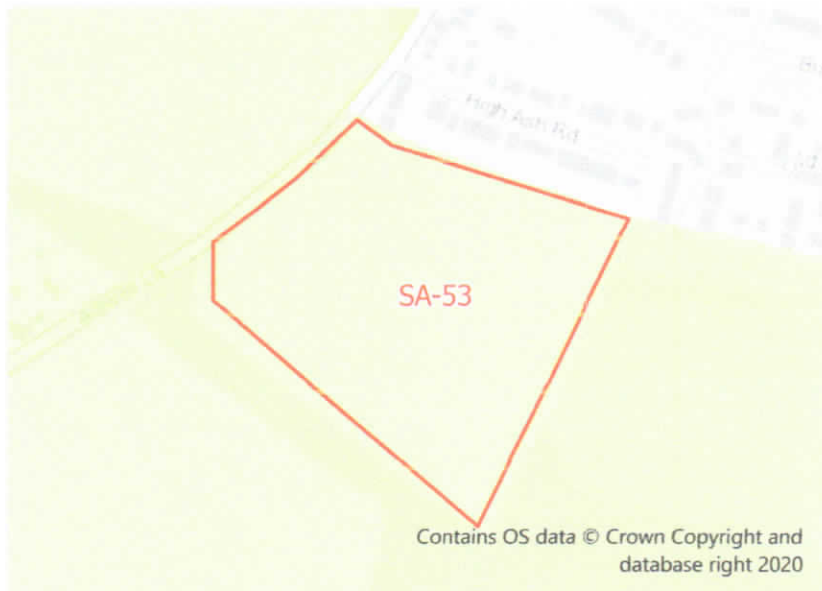
ID	Area (ha)
RA-20	1.28
RC-4	2.51

Sub-area (SA): SA-53




Strategic Land Parcel: 37

Area (ha): 4.18

Location South-west of Wheathampstead



Legend

-  Sub-area for assessment
-  St Albans Green Belt
-  Neighbouring Green Belt

Sub-area map



Looking west from the north-eastern corner of the sub-area onto an arable field and some residential properties



Looking south from the north-eastern corner of the sub-area onto an arable field



Aerial photography used as a result of limited access to and / or views of sub-area at the time of the site visit.

Boundaries

The sub-area is bounded by the regular backs of residential properties and gardens on High Ash Road to the north, by a mature tree line to the east, by a woodland to the south and by Anwell Lane to the west. Inner boundary: north. Outer boundaries: east, south and west.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	1	5	0
	No	0			

Purpose (1) To check the unrestricted sprawl of large built-up areas

(a) Land parcel is located at the edge of a discrete built-up area

The sub-area is not located at the edge of a large built-up area, in physical or perceptual terms.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary.

The sub-area does not meet purpose 1.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas.

The sub-area forms a less essential part of the gap between Wheathampstead and St Albans. It is judged that the gap is of sufficient scale that the removal of the sub-area would not result in physical or perceptual merging between neighbouring built-up areas.

Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development.

The sub-area is not covered by any built form. The sub-area comprises an open arable field. The sub-area has a flat topography and is bounded by dense tree lines to the south-west which limit views into wider countryside. There are short views onto residential properties to the north-east. Overall, the sub-area has a largely unspoilt rural character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.

The sub-area does not abut an identified historic place or provide views to a historic place and does not meet this purpose.

Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or purpose 4, performs weakly against purpose 2 and performs strongly against purpose 3.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	37	Limited or No Contribution	Significant	Significant	Significant

Assessment of wider impact

At the more granular level, neither the strategic land parcel nor the sub-area meet purpose 1 as neither are located at the edge of a large built-up area. The sub-area performs similarly strongly against purpose 3 compared to the strategic land parcel, by protecting the openness of the countryside. However, the sub-area performs a weaker role against purpose 2, forming only a less essential part of the gap between Wheathampstead and St Albans, compared to the strategic land parcel which plays a strong role in contributing to the strategic gap of these settlements. As the sub-area does not abut an identified historic place or provide views to a historic place, it makes a lesser contribution to purpose 4 in preserving a historic context, compared to the strategic land parcel.

The sub-area does not adjoin any other sub-areas however is surrounded by wider Green Belt to the north-east, south-west and south-east. Its removal in isolation is unlikely to alter the performance of the wider Green Belt due to the mature tree lines to the south-east and south-west boundaries which prevent longer views and connections to the wider Green Belt. However, its release would lead to a slightly irregular settlement edge to Wheathampstead.

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released is unlikely to significantly harm the performance of the wider Green Belt.

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength.	The inner boundaries are predominantly readily recognisable and likely to be permanent. The outer boundaries are predominantly readily recognisable but not likely to be permanent. If the sub-area was released, the new inner Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening.
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Categorisation & Recommendation

Sub-area category & recommendation	The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area was released, the new Green Belt boundaries would not meet the NPPF definition. The new boundaries would require strengthening. Recommended for further consideration in isolation as RA-30 (including the strip of Green Belt land to the north of the sub-area).
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Recommended Area Map



- St Albans District Boundary
- Neighbouring District Boundary
- Recommended for further consideration in combination
- Recommended for further consideration in isolation

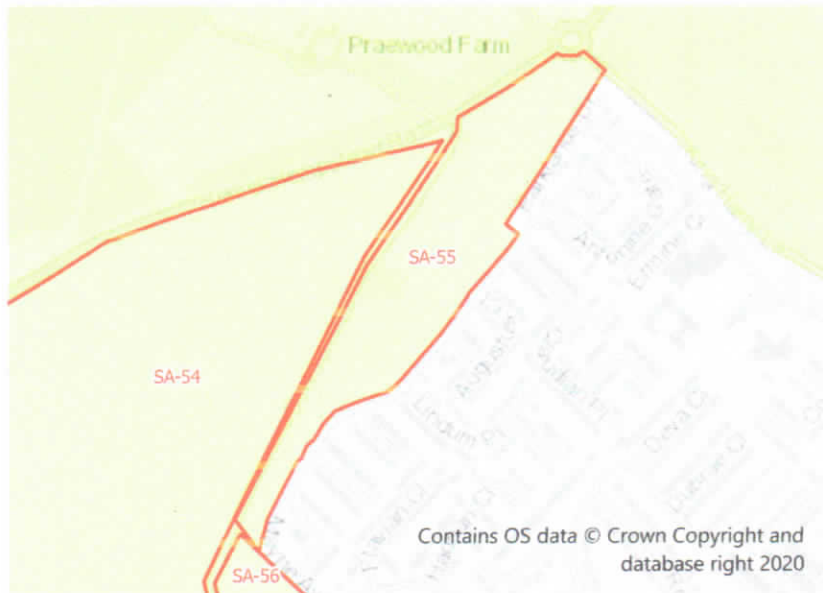
ID	Area (ha)
RA-30	4.26

Sub-area (SA): SA-55




Strategic Land Parcel: 24B

Area (ha): 6.22

Location South-west of St Albans



Legend

-  Sub-area for assessment
-  St Albans Green Belt
-  Neighbouring Green Belt

Sub-area map



Looking north onto scrubland and trees from southern edge of the sub-area



Looking north towards trees and overgrown vegetation from footpath at the centre of the sub-area



Looking south towards scrubland from north part of the sub-area

Boundaries

The sub-area is bounded by Hemel Hempstead Road (A4147), the Bluehouse Hill Roundabout, and King Harry Lane to the north, by Parklands Drive and Mayne Avenue together with some regular backs of residential properties and gardens at either end of Parklands Drive to the east, by Bedmond Lane to the west, and by a mature and intermittent tree line to the south. Inner boundaries: east. Outer boundaries: north, east and west.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	0	4	1
	Yes	5			

Purpose (1) To check the unrestricted sprawl of large built-up areas

(a) Land parcel is located at the edge of a discrete built-up area The sub-area is located at the edge of St Albans with physical connections on its east boundary.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary. The sub-area is connected to a large built-up area of St Albans. There are predominantly no prominent outer boundary features for St Albans within a reasonable distance of the sub-area which are likely to prevent outward sprawl. Development within this sub-area would lead to irregular sprawl of the large built-up area.
The sub-area has predominantly recognisable and likely to be permanent inner boundaries, which provide an additional barrier to sprawl.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas. As a result of its very small scale and strong perceptual enclosure from the wider Green Belt, the sub-area makes no discernible contribution to the separation of neighbouring built-up areas in physical or perceptual terms.

Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development. Approximately 4% of the sub-area is covered by built form. Built form is concentrated to a small part of the north of the sub-area. The rest of the sub-area comprises woodland and shrub land vegetation. Due to the dense woodland within and surrounding the sub-area, there is a high level of visual enclosure with limited views to the surrounding countryside or adjacent area. Overall, the sub-area has a strongly unspoilt rural character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.	Although a small portion of the sub-area abuts the St Albans Conservation Area to the north, due to the high level of visual enclosure within the sub-area, there are negligible views to the Conservation Area. From the Conservation Area, there are very limited views of the sub-area since only the very short north-east boundary is visible from the south-west boundary of the Conservation Area. This means the sub-area has little relationship with the Conservation Area and so does not contribute to its immediate context. Overall, the sub-area has a weak relationship with the historic place.
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Summary

The sub-area performs strongly against the purposes overall. The sub-area meets purpose 1 criteria (a) and performs strongly against purpose 1 criteria (b). It does not meet purpose 2, and performs weakly against purpose 4 and strongly against purpose 3.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	24B	Limited or No Contribution	Significant	Significant	Significant

Assessment of wider impact At a more granular level, the sub-area performs similarly against purpose 3, and plays a lesser role against purposes 2 and 4, and makes a more significant contribution to purpose 1 compared to the strategic land parcel. As the sub-area is located at the edge of a large built-up area, and does not have prominent outer boundary features, it plays a significant role in checking unrestricted sprawl. The sub-area is very small in scale and has strong perceptual enclosure from the wider Green Belt, hence it plays a minor role in preventing neighbouring settlements from coalescing. Despite the high level of visual enclosure within the sub-area, it maintains a strongly unspoilt rural character which contributes to safeguarding the countryside from encroachment. Whilst the sub-area abuts the Conservation Area, the majority of the sub-area has little relationship with it due to a strong sense of visual enclosure.

The sub-area adjoins sub-area SA-54 to the west and sub-area SA-56 to the south. The removal of the sub-area in isolation is unlikely to alter the contribution of the adjacent sub-areas to NPPF purposes as it has a weak perceptual relationship with these sub-areas. The removal of the sub-area in isolation may be considered as rounding-off the settlement edge.

In combination with sub-areas SA-54 and SA-56, the removal of the sub-area is likely to impact on the performance of the wider Green Belt, as it would represent the irregular and disproportionate spread of the large built-up area of St Albans. In addition it would constitute a notable erosion of the strategic gap between St Albans and Hemel Hempstead; as well as a significant reduction in the gap between St Albans and Chiswell Green.

Summary	Overall, the sub-area plays an important role with respect to the strategic land parcel, however if released in isolation, is unlikely to significantly harm the performance of the wider Green Belt.
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Consideration of Boundaries





Commentary on boundary features and impact on Green Belt boundary strength.	The inner boundary and majority of outer boundaries are readily recognisable and likely to be permanent. The short outer boundary to south is recognisable but not necessarily permanent. If the sub-area was released, the new inner Green Belt boundary would not meet the NPPF definition. The new boundary would require strengthening.
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Categorisation & Recommendation

Sub-area category & recommendation	The sub-area performs strongly against NPPF purposes but makes a less important contribution to the wider Green Belt. If the sub-area is released in isolation, it would result in the designation of a similar strength boundary compared to the existing inner Green Belt boundary. The new boundary to the south would require strengthening to ensure it is readily recognisable and likely to be permanent. Recommended for further consideration as RA-31.
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Recommended Area Map



-  St Albans District Boundary
-  Neighbouring District Boundary
-  Recommended for further consideration in combination
-  Recommended for further consideration in isolation

ID	Area (ha)
RA-31	6.22

APPENDIX 5

Sub-area (SA): SA-133

Strategic Land Parcel: 26 Area (ha): 2.45 Location West of How Wood, East of Chiswell Green



- Legend
- Sub-area for assessment
 - St Albans Green Belt
 - Neighbouring Green Belt

Sub-area map



Looking south-west with views along a footpath along the west section of the sub-area



Looking north-west from west boundary of sub-area with views across open field



Looking east from west boundary of sub-area with views of park area

Boundaries

The sub-area is bounded by regular backs of residential properties and gardens along Melita and Orchard Drive to the north, Orchard Drive to the east, Mayflower Road to the south and the North Orbital Road (A405) to the west. Inner boundaries: north and east. Outer boundaries: south and west.

Purpose Assessment

Sub-area Assessment Summary

Sub-area scores	Purpose 1		Purpose 2	Purpose 3	Purpose 4
	Criteria (a)	Criteria (b)	5	2	0
	No	0			

Purpose (1) To check the unrestricted sprawl of large built-up areas

(a) Land parcel is located at the edge of a discrete built-up area

The sub-area is not at the edge of a large built-up area in physical or perceptual terms.

(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another defensible boundary.

The sub-area does not meet purpose 1.

Purpose (2) To prevent neighbouring towns merging into one another

Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas.

The sub-area forms almost the entire gap between How Wood and Chiswell Green. Notwithstanding this, it is noted that there are negligible perceptual links between How Wood and Chiswell Green in the locality of the sub-area, as existing dense and unbroken tree lines adjacent to the west sub-area boundary and settlement boundaries (on both sides of the North Orbital Road) screen views between the neighbouring settlements. These tree lines are currently protected, by virtue of lying within the Green Belt.

Purpose (3) To assist in safeguarding the countryside from encroachment

Protects the openness of the countryside and is least covered by development.

Approximately 3% of the sub-area is covered by built form. This comprises residential and mobile homes towards the north of the sub-area. The northern section of the sub-area is predominantly formed of scrubland and meadows, with a woodland screening to surrounding areas. By contrast, the southern section of the sub-area comprises a playground and park with an urban managed character; it is bound by a chain link fence, providing open views to adjacent built form at the edge of How Wood and a strong sense of connection with the urban area. Overall the sub-area has a semi-urban character.

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

Protects land which provides immediate and wider context for a historic place, including views and vistas between the place and surrounding countryside.

The sub-area does not abut an identified historic place or provide views to a historic place and does not meet this purpose.

Summary

The sub-area performs strongly against the purposes overall. The sub-area does not meet purpose 1 criteria (a) or 4; and performs weakly against purpose 3 and strongly against purpose 2.

Wider Green Belt Impacts

Strategic Land Parcel Scores (GBR)	Strategic Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4
	26	Limited or No Contribution	Partial	Limited or No Contribution	Limited or No Contribution

Assessment of wider impact

At the more granular level, the sub-area performs similarly against purposes 1, 3 and 4, and plays a greater role against purpose 2 compared to the strategic land parcel. As the sub-area is not located at the edge of a large built-up area, it does not contribute to checking unrestricted sprawl. Although, the sub-area is small in scale compared to the strategic land parcel, it is located within a thin strip of land between How Wood and Chiswell Green, forming almost the entire gap between these settlements and hence plays an essential role in preventing settlements from coalescing. The sub-area has strong visual and perceptual connections to the adjacent settlements, which diminishes its contribution to protecting the openness of the countryside. As the sub-area does not abut an identified historic place or provide views to a historic place, it makes no contribution to preserving a historic context.

The sub-area does not adjoin any other sub-areas. The removal of the sub-area in isolation would result in closing almost the entire gap between How Wood and Chiswell Green, with only a thin strip of Green Belt remaining along the North Orbital Road (A405). However, the sub-area is already enclosed by built development and therefore impacts to the performance of the remaining narrow strip of Green Belt against purpose 3 are likely to be limited.

Summary

Overall, the sub-area plays an important role with respect to the strategic land parcel, and its release in isolation would harm the performance of the wider Green Belt.

Consideration of Boundaries

Commentary on boundary features and impact on Green Belt boundary strength.	The inner and outer boundaries are readily recognisable and likely to be permanent. If the sub-area was released, the new inner Green Belt boundaries would meet the NPPF definition.
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Categorisation & Recommendation

Sub-area category & recommendation	The sub-area performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt. Not recommended for further consideration.
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