



Borough of Broxbourne  
Review of the Green Belt for the  
Preparation of Local Development  
Framework (LDF)  
Final Report

March 2008



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## TABLE OF CONTENTS

<b>1</b>	<b>EXECUTIVE SUMMARY</b>	<b>4</b>
<b>2</b>	<b>INTRODUCTION</b>	<b>11</b>
<b>3</b>	<b>POLICY REVIEW</b>	<b>13</b>
<b>4</b>	<b>FUNCTIONAL REVIEW</b>	<b>33</b>
<b>5</b>	<b>GREEN BELT STUDIES &amp; BEST PRACTICE REVIEW</b>	<b>37</b>
<b>6</b>	<b>GREEN BELT REVIEW METHODOLOGY &amp; CRITERIA</b>	<b>40</b>
<b>7</b>	<b>RESULTS AND ANALYSIS</b>	<b>46</b>
<b>8</b>	<b>CONCLUSIONS AND RECOMMENDATIONS</b>	<b>69</b>
	<b>GLOSSARY</b>	<b>90</b>

## APPENDICES

- Appendix 1: Final methodology and criteria
- Appendix 2: Results and analysis against the three PPG2 purposes by sub area
- Appendix 3 Details by sub area for Green Belt Purpose 3. Safeguarding the countryside from encroachment
- Appendix 4: Assessment of Green Belt sub area boundaries
- Appendix 5: Constraints and opportunities assessment
- Appendix 6: Schedule of proposed Green Belt alterations
- Appendix 7: Long-term areas of search

## MAPS

- Map 1 Purpose 1 Results- role of sub areas in checking the unrestricted sprawl of large built-up areas
- Map 2 Purpose 2 Results- role of sub areas in preventing neighbouring towns from merging into one another
- Map 3 Purpose 3 Results- role of sub areas in assisting in safeguarding the countryside from encroachment
- Map 4 Performance of sub areas against Green Belt purposes 1, 2 and 3
- Map 5 Weak points in the Broxbourne Green Belt inner boundary
- Map 6 Proposed Option 1 changes
- Map 7 Proposed Option 2 changes
- Map 8 Long term areas of search

## 1 EXECUTIVE SUMMARY

- 1.1.1 The Borough of Broxbourne commissioned Scott Wilson planning consultants to conduct a single issue Green Belt Review in order to provide the context and information to inform potential changes to the Green Belt as part of their Local Development Framework process. Any changes to the Green Belt would need to be incorporated into Broxbourne's Development Planning Documents and follow all relevant statutory plan-making processes.
- 1.1.2 Central to the formulation of this Review is the advice contained in Planning Policy Guidance Note 2: Green Belts, which provides national guidance related to matters such as the aims, purposes and boundaries of Green Belt land. A full policy review was undertaken of plans and documents that relate to Green Belts. Some of the key regional and local policies that were taken into account include:
- the draft East of England Plan recommends in Policy SS7 that a local review of Broxbourne's Green Belt is carried out;
  - Broxbourne's Core Strategy; Issues and Options, May 2007 discussed under Theme 3: Green Belt and Countryside raised three issues related to a review of the Green Belt; and
  - Borough of Broxbourne Local Plan Second Review 2001-2011 policy GBC1, in accordance with Structure Plan policies 5 and 7, set out four areas to be excluded from the Green Belt and proposed these areas for employment and educational uses as well as one area that would create a more defensible boundary.
- 1.1.3 A Functional Review was carried out to examine the broad context of the study in terms of the state of Broxbourne's existing Green Belt. A literature review of Green Belt studies was conducted to help determine relevant and robust methodology and criteria that would accurately reflect the local circumstances of Broxbourne.
- 1.1.4 The methodology for the Review has been formulated in close collaboration with the Borough of Broxbourne, and in consultation with key stakeholders. All the Green Belt land in the Borough was split up into broad areas and then further divided up into sub-areas in order to make assessment more manageable and analysis more clear, and to ensure all Green Belt land was included in the review. The assessment is essentially separated into three key stages:
- assessment of Green Belt land against three of the five Green Belt purposes;
  - assessment of the strength of the current inner Green Belt boundary; and
  - assessment of the constraints and sustainable development opportunities to inform an appropriate policy approach to land that is proposed to be removed from the Green Belt.

## Results

- 1.1.5 The Green Belt of Broxbourne checks the unrestricted sprawl of built up areas (Green Belt Purpose 1) in a number of ways:
- Towards the north-west of the Borough, the Green Belt provides a barrier between the Broxbourne urban area and the open Green Belt, it maintains the open character of the open Green Belt, and separates the urban area of Broxbourne from Hertford Heath.
  - To the south-west, Green Belt land separates a number of clustered distinct existing settlements between the large urban area of Broxbourne and Cuffley. It also provides a barrier between the Broxbourne urban area and the open Green Belt, and maintains the open character of the open Green Belt.
  - To the East of the Borough, the Green Belt provides a barrier between the large urban area of Broxbourne and a number of distinct settlements to the east of the Borough boundary. It also checks unrestricted sprawl into the open Green Belt towards the middle of the eastern side of the Borough.
- 1.1.6 There is a small number of Green Belt sites that do not perform a clear purpose in preventing urban sprawl; they just separate land within the same urban area. These are all located around the edge of the large urban area of Broxbourne.
- 1.1.7 The Green Belt of Broxbourne prevents neighbouring distinct settlements from merging into one another (Green Belt Purpose 2) in a number of specific locations:
- Towards the north-west of the Borough, the Green Belt predominantly provides a barrier between the large urban area of Broxbourne and communities around Hertford Heath.
  - To the mid-west of the Borough, the Green Belt provides a barrier within and between the large urban area of Broxbourne, a number of smaller clustered settlements, and the village of Cuffley, to the west of the Borough.
  - To the south of the Borough, Green Belt land provides a barrier between the large urban area of Broxbourne and the London Borough of Enfield.
  - To the east of the Borough, the large urban area of Broxbourne neighbours Green Belt land which forms part of the Lee Valley Regional Park, and provides a barrier between the large urban area of Broxbourne and a number of settlements to the east of the Borough.
- 1.1.8 Overall, the Green Belt in Broxbourne appears to play a moderate role in terms of countryside value (Green Belt Purpose 3), although a number of sub areas achieve high scores in relation to the specific areas assessed. Specific issues to note include:
- A small number of international nature designations to the east and to the west of the Borough, with a broader spread of local wildlife sites in all Green Belt

Areas. Green Belt Area B, to the west of the Borough, and E, to the east, perform particularly strongly in relation to nature conservation value;

- All sub areas across the Green Belt have some tree cover, although only a few contain protected trees and areas of ancient woodland;
- There is a predominance of greenfield land in the Green Belt. Some sub areas contain some brownfield land, and a number of sub areas are made up entirely of previously developed land, especially in the tight cluster of settlements in and around Green Belt Area C;
- The overwhelming majority of Green Belt sub areas are of moderate agricultural value, with two notable areas of high quality agricultural value in Green Belt Areas B and D.

### **Strongly performing sub areas**

- 1.1.9 The majority of sub areas play a strong role (i.e. achieve the full points) for at least one of the Green purposes.
- 1.1.10 Sub areas that are located away from the urban area tend to perform well against the Green Belt purposes because:
- they play a strong role in preventing urban sprawl, being located in open Green Belt where it is important that the Green Belt designations are retained; and
  - due to their location, they tend to be more likely to achieve high countryside value, more likely to be greenfield, to contain protected sites and woodland.
- 1.1.11 Sub areas that are located close to the urban area, between two or more distinct settlements score highly overall due to their key role in preventing sprawl between settlements.

### **Poorly performing sub areas**

- 1.1.12 Poorly performing sub areas tend to be those that are located around the edge of the urban area, and that are surrounded on three sides by existing built development. These are often created by irregular, incremental development around the edge of the urban area, which has led to enclosed areas of Green Belt land, and hence as a result has significantly reduced their purpose. These sub areas do not play a strong role in preventing sprawl or separating existing settlements as, in practice, they represent enclosed spaces that bear little relation to the open Green Belt or to distinct settlements. Map 4 of the Review shows the location of these sub areas.

### **Boundary analysis**

- 1.1.13 The strength of the Green Belt boundary in the inner Green Belt is variable. The A10 dual carriageway to the west of the large urban area of Broxbourne, and the rail line immediately east provide very strong barriers to encroachment. There are

also a number of areas where the boundary is marked by strong features such as distributor roads and thick tree lines.

- 1.1.14 However, a significant number of weak areas of the inner Green Belt boundary were found. This was especially the case where the Green Belt boundary ran along the rear gardens of homes or curtilages of existing buildings with no clear or permanent barrier between the two. These are shown in Map 5 of the Review.
- 1.1.15 As a result of this, the Review considered how the Green Belt inner boundary could be realigned to improve its defensibility and resilience, as well as to identify the removal of those sub areas that no longer perform a strong role under purposes defined by PPG2. In addition to this analysis, a further assessment was made of development constraints and sustainable development opportunities.

## 1.2 Summary of Recommendations for the Broxbourne Green Belt

- 1.2.1 Two main options are proposed for future Green Belt policy in Broxbourne. Option 1 suggests potential changes to the Green Belt that may generally be considered in the short to medium term (current plan period up to 2031). The change options include: re-designating Green Belt land to other protection policies, safeguarding land and allocating land to meet any identified development needs. Option 2 suggests potential changes to the Green Belt that would generally relate to post 2031. These changes are proposed to ensure enough land is safeguarded for future needs, improve the overall Green Belt boundaries and to ensure further incremental changes are not needed in the future. Excessively tightly drawn Green Belt boundaries around built-up areas will not secure the degree of permanence that Green Belts should have.
- 1.2.2 The timescales suggested for Options 1 and 2 are not absolute and there may be sites from either that may need to be brought forward due to location, sustainability or regeneration factors. It should also be noted that any land that is released from the Green Belt will be determined by the Borough of Broxbourne in the light of development needs to be defined by the East of England Plan and by the Council through the Local Development Framework process, including the examination of the evidence base and outcomes from any required Sustainability Appraisals, especially on Development Plan Documents on Site Specific Allocation of Land.

### ***Option 1***

- 1.2.3 Option 1 proposes discreet adjustments to the Green Belt boundary to be carried out in order to strengthen the Green Belt boundary, along with the removal of poorly performing areas, but without significant losses of Green Belt land. Option 1 would have the benefit of avoiding wholesale losses and represents an opportunity to improve the defensibility of the Green Belt boundary. These areas of land may also create some limited opportunities to provide sites to meet current development needs, and to safeguard land to meet possible future needs in the short to medium term (i.e. up to 2031), if required. See paragraph 1.3 for more

details regarding possible future uses for sites removed from the Green Belt under Option 1.

- 1.2.4 Map 6 of the Review shows where a number of discreet alterations to the Green Belt would enable the removal of poorly performing areas of Green Belt, and the creation of a strengthened inner Green Belt boundary.

### ***Option 2***

- 1.2.5 Option 2 builds on Option 1, but would involve the additional removal of larger areas of Green Belt land in order to create an even stronger and a long-term defensible Green Belt boundary. These alterations are shown on Map 7 of the Review. These alterations provide further opportunity to safeguard land to meet possible future development needs (i.e. post 2031), if required. Again, see Paragraph 1.3.3 for details regarding potential future uses for sites removed from the Green Belt under Option 2.

### ***Long Term Areas of Search***

- 1.2.6 Option 1 provides a way to improve the function and defensibility of the Broxbourne Green Belt over the short term whilst Option 2 goes further and is presented as medium term solution. The Borough of Broxbourne may wish to consider wider, long-term measures to substantially improve the permanence and robustness of the Green Belt to ensure no further changes or review is required before 2031, or over an even longer timescale.
- 1.2.7 The report indicates three large areas where significant removal of land from the Green Belt would enable the Council to establish permanent inner Green Belt boundaries that would prevent encroachment in these areas in the long term. However, this would also lead to the loss of significant amounts of open Green Belt land, which may not be seen as necessary even in the long term. The three areas of land are indicated on Map 8 of the Review. These areas of search provide more substantial opportunities to remove areas from the Green Belt to safeguard land for future protection and development needs post 2031.

## **1.3 Development, Protection and Safeguarding Policies**

- 1.3.1 Removal from the Green Belt does not mean that there are no means to protect the land, nor does it mean that the site would be automatically developed. Indeed, it is considered that this Review provides the opportunity for the Council to ensure improved protection of some sites by providing policies that better suit their characteristics in terms of social, economic and environmental significance, as opposed to Green Belt status, where the land no longer performs a clear Green Belt purpose.

- 1.3.2 A basic assessment of constraints and opportunities highlighted the need to ensure that a more suitable policy framework is put in place to ensure that land removed from the Green Belt is considered more appropriately in terms of protection, safeguarding, and, where appropriate, development.
- 1.3.3 The following key recommendations are therefore made relating to the policy approach towards land removed from the Green Belt:
- Appropriate policies should be put in place to protect land of community value, including designated open space and allotments;
  - Appropriate policy protection must be given to land of environmental importance, including areas of high landscape character and local wildlife sites;
  - A schools policy should be introduced to address the future development needs of schools that are suggested to be removed from the Green Belt; and
  - Where appropriate some land could be safeguarded to serve development needs in the longer term (i.e. post 2021 and 2031), and
  - Poorly performing Green Belt land with weak boundaries and no major development constraints may be allocated for development to meet current needs that cannot be accommodated within the built-up areas, subject to development needs and Sustainability Appraisal.
- 1.3.4 The recommendations in this review should be used in conjunction with other Local Development Framework evidence base documents, including any required sustainability appraisals. This will help to inform and shape Broxbourne's planning strategy in relation to its Green Belt, and wider issues of growth and sustainable development. For example, the Council would need to use urban capacity and Strategic Housing Land Availability Assessment information in conjunction with the recommended land options in this Green Belt Review to determine the amount of land that would need to be removed from the Green Belt to meet development needs in this plan period to 2021, up to 2031 as well as post 2031.
- 1.3.5 Full assessments of development constraints and a Sustainability Appraisal will be required to address the suitability of potential development sites, including any Green Belt land discussed in this Review.
- 1.3.6 The LDF evidence base should also include a detailed analysis of the policy context in which the Core Strategy and Site Specific Allocations of Land DPDs are being prepared. Broxbourne should therefore ensure an appropriate review has been undertaken of the policies, plans, programmes, strategies and initiatives (PPPSIs) with an influence on the content of these DPDs (this is also a discrete task required as part of the SA process). This review should assist Broxbourne in taking forward options and preferred options for the Borough. These would likely include the need to accommodate the housing allocation set out in the RSS. The review will also highlight the objectives of other organisations and service providers which Broxbourne will pursue through their DPDs (i.e. these could include objectives relating to health, the local economy or biodiversity). Taking

account of these objectives in formulating and delivering LDFs is at the heart of the concept of spatial planning.

## 2 INTRODUCTION

### 2.1 Context of the Review

- 2.1.1 Planning Policy Guidance 2: Green Belts (PPG2) advise that Green Belts are established via development plans and fixed by structure plans, under the former planning system. Green Belt matters are now dealt with in Regional Spatial Strategies. *Planning Policy Statement 11: Regional Spatial Strategies* (PPS11) and *Planning Policy Statement 12: Local Development Frameworks* (PPS12) make the hierarchy of plans clear. The Borough of Broxbourne's Local Development Documents must be in accordance with the East of England Plan (Regional Spatial Strategy) policies. The Secretary of State's decision on the Panel's Report in regard to Green Belts made it clear in Policy SS7 that:

*"A more local review will be required in Broxbourne. These reviews will have to satisfy national criteria for Green Belt releases, accord with the spatial strategy, and ensure that sufficient land is identified to avoid the need for further review to meet development needs before 2031."<sup>1</sup>*

- 2.1.2 It is acknowledged that the starting point for the review of Broxbourne's Green Belt is the advice contained in PPG2. However the local spatial context of Broxbourne's Green Belt must be considered in developing the approach used in this review. Past linear development patterns, horticultural activities and rural areas of the Borough have all contributed to the existing state of Broxbourne's Green Belt. The Metropolitan Green Belt around London is large and very complex and perhaps atypical of other Green Belt areas around historical settlements, such as Cambridge or York. Therefore it is important that advice in PPG2 has been interpreted to fit with Broxbourne's existing local context.

### 2.2 Scope of Review

- 2.2.1 The scope of the review has been limited to the Borough of Broxbourne itself, due to limits of East of England Plan policy SS7. However Broxbourne is within the Metropolitan Green Belt, so its Green Belt flows into the surrounding Councils' administrative areas. Therefore, generally, the review has examined all Green Belt land within the Borough, but in the question of coalescence, account has been taken of settlements just outside Broxbourne.

### 2.3 Purpose of Review

- 2.3.1 Scott Wilson was appointed by the Borough of Broxbourne in May 2007 to undertake a local review of Broxbourne's Green Belt. The Green Belt review was conducted in a logical and transparent manner. The purpose of the review is to produce a final report that will form part of the evidence base for the Borough of Broxbourne's LDF.

<sup>1</sup> Government Office for the East of England (December 2006) *The Secretary of State's Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England and Statement of Reasons, Part 2: Modified Text of RSS incorporating Proposed Changes*, pp. 93-94

This will allow the Council to consider options and preferred options for the Green Belt land and boundaries as part of their Local Development Framework (LDF) Core Strategy and Site Allocations Development Plan Documents (DPDs).

## 2.4 Using the Green Belt Review Report

- 2.4.1 Scott Wilson is providing independent advice using guidance from government publications. However, the contents of this report represent the views of the consultants, which might not necessarily be supported by the Council or via consultation on future DPDs. In order to implement the proposals for Green Belt and other related planning policies, the Council will need to take them through the statutory development plan process. This must include a public consultation and a sustainability appraisal of DPDs on any likely social, environmental or economic effects. Whilst this report provides a robust evidence base to support the development plan process, it does not reflect the final changes to the Green Belt, which may be brought forward in the future.

## 3 POLICY REVIEW

### 3.1 Introduction

- 3.1.1 The policy review provides an overview of national, regional and local policies and plans.

### 3.2 National Context

#### Planning For a Sustainable Future; White Paper (2007)

- 3.2.1 The Planning White Paper reiterates the Government's support for Green Belts. It states:

- 7.62 Green Belts perform an important function in preventing urban sprawl, preventing towns from merging into one another, safeguarding the countryside from encroachment, preserving the setting and character of historic towns and helping urban regeneration. The Government is committed to the principles of the Green Belt and will make no fundamental change to planning policy as set out in Planning Policy Guidance Note 2.
- 7.63 Policy is that, once designated, inappropriate development should only take place in Green Belts in very special circumstances. Where development has the potential to enhance the surrounding area by improving community access to open green space, providing additional recreational facilities, or enhancing biodiversity and wildlife, these are material factors that should be weighed into the balance by decision makers when planning applications are determined.
- 7.64 Decisions on Green Belt boundaries should be made through the development plan process as current policy allows for. To ensure that future development takes place in the most appropriate and sustainable locations it is also important that planning authorities should, where appropriate, continue to review Green Belt boundaries when they are drawing up their development plans, as current planning policy allows them to do, and as has already been undertaken in some areas.<sup>2</sup>

#### Planning and Compulsory Purchase Act 2004

- 3.2.2 The Planning and Compulsory Purchase Act 2004 introduced major changes to the planning system. Local Planning Authorities (LPAs) should act "*with the objective of contributing to the achievement of sustainable development.*"<sup>3</sup> LPAs should also have regard to national policies and advice documents issued by the Government (also see PPS1 and PPS12 below).

<sup>2</sup> HM Government (The Secretary of State for Communities and Local Government; The Secretary of State for Environment, Food and Rural Affairs; The Secretary of State for Trade and Industry and The Secretary of State for Transport) (2007) *Planning for a Sustainable Future; White Paper*, pp. 117-118

<sup>3</sup> Planning and Compulsory Purchase Act 2004, Section 39

## Sustainable Communities: People, Places and Prosperity (2005)

3.2.3 The aims of the Office of the Deputy Prime Minister (ODPM) Sustainable Communities' strategy are provision of:

- A decent, affordable home;
- A community in which to live and work;
- The chance to develop skills and interests;
- Access to jobs and excellent services; and
- The chance to get engaged in the community and to make a difference.

3.2.4 The report reviews what progress the Government has made since 2003 in delivering change. It explains how 19,000 hectares have already been added to the Green Belt - an area roughly equivalent to the size of Liverpool. Current plans also have proposals for 12,000 more hectares of Green Belt land. The target for 60% of all new development should be built on brownfield land has increased in England from 56% in 1997 to 67% in 2003. Density rates have also increased from 25 dwellings per hectare in 1997 to 33 dwellings per hectare in 2003. This means more homes are being built on less land.<sup>4</sup>

## PPS1: Delivering Sustainable Development (2005)

3.2.5 PPS1 in paragraph 5 states, "*Planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by:*

- *making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life;*
- *contributing to sustainable economic development;*
- *protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities;*
- *ensuring high quality development through good and inclusive design, and efficient use of resources; and*
- *ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.*<sup>5</sup>

3.2.6 PPS1 in paragraph 26 states that "*in preparing plans, planning authorities should:*

<sup>4</sup> ODPM (2005a) *Sustainable Communities: People, Places and Prosperity*, p. 25

<sup>5</sup> ODPM (2005b) *Planning Policy Statement 1: Delivering Sustainable Development*, paragraph 5, p. 2

- *Recognise the needs and broader interests to secure a better quality of life for the community as a whole.*
- *Ensure plans have appropriate time scales ....*
- *Not impose disproportionate costs, in terms of environmental and social impacts, or by nature constrain otherwise beneficial economic or social development.*
- *Have regard to the resources needed to implement plan proposals.*
- *Take account of the range of effects (both negative and positive) on the environment, as well as the positive effects of development in terms of economic benefits and social well being ....*
- *Ensure plans and policies are based on analysis and evidence ....*
- *Take full account of the need for transparency, information and participation.*
- *Recognise that the impact of proposed development may adversely affect people who do not benefit directly... .*<sup>6</sup>

### **PPG2: Green Belts (1995, amended 2001)**

- 3.2.7 PPG2 makes it clear that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Green Belts help to shape the pattern of urban development around London, regional and sub-regional scale. They can assist in moving towards more sustainable patterns of urban development.
- 3.2.8 PPG2 paragraph 1.5 states, “*there are five purposes of including land in Green Belts:*
- To check the unrestricted sprawl of large built-up areas;
  - To prevent neighbouring towns from 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.”<sup>7</sup>
- 3.2.9 Local planning authorities should have regard to a timescale longer than the plan period when considering proposals that affect Green Belt policies. “*They should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. In order to ensure protection of Green Belts within this longer timescale, this will in some cases mean safeguarding land between the urban area and the Green Belt which may be required to meet longer-term development needs.*”<sup>8</sup> The correct procedure to do this is through the review of the

<sup>6</sup> ODPM (2005b) *Planning Policy Statement 1: Delivering Sustainable Development*, paragraph 26, pp. 10-11

<sup>7</sup> ODPM (1995, amended 2001) *Planning Policy Guidance 2: Green Belts*, paragraph 1.5, p. 5

Development Plan (i.e. in this case the East of England Plan and Broxbourne's LDF). More detailed guidance on safeguarded land is given in Annex B of PPG2.

- 3.2.10 The purposes of the Green Belt set out above will provide the fundamental basis for the review of Broxbourne's Green Belt and shape the methodology of the review (also see Section 6 of the report).

### **The Town and Country Planning (Green Belt) Directive 2005**

- 3.2.11 The ODPM issued a formal Direction that required local planning authorities to refer to him certain planning applications involving inappropriate development in the Green Belt. However, the Direction begins by reiterating the Government's support of Green Belts and does not alter the policies in PPG2.<sup>9</sup> Circular 11/2005 is annexed to this Directive and provides detailed criteria for referring planning applications for inappropriate development in the Green Belt, as defined by PPG2. This will help the Secretary of State to decide which planning applications to call in and which potentially have a more significant and harmful impact on the Green Belt. This advice is more relevant to shaping policies in Broxbourne's Core Strategy and Development Control Development Planning Document (DC DPD).

### **PPS3: Housing (2006)**

- 3.2.12 The Government intends that everyone should have the opportunity of a decent home. Local planning authorities should plan to meet the housing requirement of the whole community, which they can afford, in a community where they want to live. They should also address providing a mix of different types of housing, making efficient and effective use of land, and use flexible response to the supply of land, including use of previously developed land, where appropriate.
- 3.2.13 There is an allowance for affordable housing within the Green Belt on sites known as rural exception and when it is supported by a local planning policy.<sup>10</sup>

### **PPS7: Sustainable Development in Rural Areas (2004)**

- 3.2.14 The Government's objectives for rural areas are:
- To raise the quality of life and the environment in rural areas;
  - To promote more sustainable patterns of development;
  - To promote the development of English regions by improving their economic performance; and
  - To promote sustainable, diverse and adaptable agriculture sectors.

<sup>8</sup> ODPM (1995, amended 2001) *Planning Policy Guidance 2: Green Belts*, paragraph 2.12, p. 8

<sup>9</sup> ODPM (2005c) *Circular 11/2005 The Town and Country Planning (Green Belt) Direction 2005*, paragraph 1, p. 1

<sup>10</sup> CLG (2006) *Planning Policy Statement 3: Housing*, paragraph 30, p. 11

- 3.2.15 Local planning authorities should ensure that planning policies in LDDs address land uses and opportunities found in the countryside around urban areas. It is also important to consider access for people who live and work in urban areas to enjoy the countryside, to secure environment improvements and to facilitate the provision of appropriate sport and recreation facilities.<sup>11</sup>
- 3.2.16 In regard to farm diversification, “*local planning authorities should, where relevant, give favourable consideration to proposals for diversification in Green Belts where the development preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.*”<sup>12</sup>

### **PPG8: Telecommunications (2001)**

- 3.2.17 Telecommunications developments are likely to be inappropriate in the Green Belt unless they maintain openness.<sup>13</sup>

### **PPS9: Biodiversity and Geological Conservation (2005)**

- 3.2.18 Local planning authorities should ensure that “biological and geological diversity are conserved and enhanced as an integral part of social, environmental and economic development”. Also there is a need “to conserve, enhance and restore the diversity of England’s wildlife and geology as well as to contribute to rural renewal and urban renaissance”. Developments should “take account of the role and value of biodiversity in supporting economic diversification and contributing to a quality environment”. LDDs show designated sites of important biodiversity and geodiversity as well as primary habitats.
- 3.2.19 *Planning Policy Statement 9: Biodiversity and Geological Conservation (PPS9)* sets out national planning policies on the protection of biodiversity and geological conservation. *Circular 06/05: Biodiversity and Geographical Conservation - Statutory Obligations and Their Impact Within the Planning System* provides administrative guidance on the application of the law in England relating to planning and nature conservation. This Guide complements those publications and provides good practice guidance on ways regional planning bodies and local planning authorities can help deliver the national policies in PPS9 and comply with legal requirements set out in the Circular.

<sup>11</sup> CLG (2004) *Planning Policy Statement 7: Sustainable Development in Rural Areas*, paragraph 26, p. 15

<sup>12</sup> CLG (2004) *Planning Policy Statement 7: Sustainable Development in Rural Areas*, paragraph 30 (iii), p. 16

<sup>13</sup> ODPM (2001) *Planning Policy Guidance 8: Telecommunications*, paragraph 17, p. 6

- 3.2.20 The Guide defines 'green infrastructure' as "*the sub-regional network of protected sites, nature reserves, greenspaces and greenway linkages. The linkages include river corridors and flood plains, migration routes and features of the landscape which are important as wildlife corridors. Green infrastructure should provide for multi-functional uses i.e. wildlife, recreational and cultural experience, as well as delivering ecological services such as flood protection and microclimate control. It should also operate at all spatial scales from urban centres through to open countryside.*"<sup>14</sup>
- 3.2.21 There is an interaction between advice in PPS9, green infrastructure and Green Belts in relation to protecting the countryside, nature conservation interest as well as providing opportunities to access the open countryside and outdoor sport and recreation facilities near urban areas.

### **PPS10: Planning for Sustainable Waste Management (2005)**

- 3.2.22 The waste authority is Hertfordshire County Council who will prepare minerals and waste Development Plan Documents for the entire county, including Broxbourne. PPS10, advises that plans should "*protect green belts but recognise the particular locational needs of some types of waste management faculties when defining Green Belt boundaries*".<sup>15</sup>

### **PPS11: Regional Planning (2004)**

- 3.2.23 This guidance introduces the new regional planning arrangements that are intended to deliver policy better at the regional level and address sub-regional issues. The Regional Spatial Strategy (RSS) is the East of England Plan, which was published in 2004 and the Examination in Public (EiP) Panel's report was published in June 2006 (see Regional Context section below for recommendation on Green Belt policy SS7). RSSs provide a broad development strategy for the region over a fifteen to twenty year period. The RSS should consider the following topics: identifying the location and scale of new housing, transport, infrastructure, economic development, agriculture, mineral extraction, waste treatment and disposal, and environmental priorities, including strategic Green Belt matters.<sup>16</sup>

### **PPS12: Local Development Frameworks (2004)**

- 3.2.24 This guidance "*sets out the Government's policy on the preparation of local development documents which will comprise the local development framework. The local development framework is not a statutory term; however it sets out in the form of a 'portfolio', the local development documents which collectively deliver the spatial planning strategy for the local planning authority's area.*"<sup>17</sup>

<sup>14</sup> ODPM (2006) *Planning for Biodiversity and Geological Conservation – A Guide to Good Practice*, Glossary, p. 61

<sup>15</sup> ODPM (2005) *Planning Policy Statement 10: Planning for Sustainable Waste Management*, paragraph 3, p. 6

<sup>16</sup> ODPM (2004a) *Planning Policy Statement 11: Regional Spatial Strategies*, Annex A, p. 42

<sup>17</sup> ODPM (2004b) *Planning Policy Statement 12: Regional Spatial Strategies*, paragraph 1.1, p. 1

3.2.25 PPS12 states, “the development plan will consist of:

- i. regional spatial strategies prepared by the regional planning bodies ...and
- ii. Development Plan Documents prepared by district councils ....”<sup>18</sup>

3.2.26 In the case of Broxbourne, the development plan is the East of England Plan and Broxbourne’s Development Plan Documents (DPDs - e.g. Core Strategy, Site Specific Allocations of land and Greater Brookfield Area Action Plan). Broxbourne’s DPDs must generally conform to national and regional plans, policies, and guidance (see Local Context below for details of local policies). All DPDs should be prepared in a participatory, transparent, accountable manner and be based on an appropriate evidence base. Therefore the Green Belt review will form part of the evidence base needed for developing Broxbourne’s DPDs.

3.2.27 PPS12 specifically advises that “adopted proposals maps should: identify areas of protection, such as nationally protected landscape and local nature conservation areas, Green Belt land and Conservation Areas.”<sup>19</sup>

### PPG13: Transport (2001)

3.2.28 The objective of the guidance in PPS13 “is to integrate planning and transport at the national, regional, strategic and local levels to:

- promote more sustainable transport choices for both people and for moving freight;
- promote accessible jobs, shopping, leisure, facilities and services by public transport, walking and cycling; and
- reduce the need to travel, especially by car.”<sup>20</sup>

3.2.29 In order to promote a more sustainable pattern of development, allocation of housing sites should generally follow a sequential approach that starts with previously developed land and buildings within urban areas, then urban extensions, and finally new development around nodes in good transport corridors. When local planning authorities are assessing the suitability for housing development they should, amongst other things, consider their location and accessibility “to jobs, shops and services by modes other than the car, and the potential for improving such accessibility”.<sup>21</sup>

3.2.30 PPG13 notes that in rural areas “the potential for using public transport and for non-recreational walking and cycling is more limited than in urban areas. However, the need for the same overall policy approach outlined in paragraphs 18 to 31 is as great in rural areas as it is in towns in order to help promote social inclusion, and reduce isolation for those that do not use a car for transportation. The objective should be to ensure, subject to paragraph 43, that jobs, shopping, leisure facilities

<sup>18</sup> ODPM (2004b) *Planning Policy Statement 12: Regional Spatial Strategies*, paragraph 1.7, p. 3

<sup>19</sup> ODPM (2004b) *Planning Policy Statement 12: Regional Spatial Strategies*, paragraph 2.21 i, p. 10

<sup>20</sup> ODPM (2001) *Planning Policy Guidance 13: Transport*, paragraph 4, p. 4-5

<sup>21</sup> ODPM (2001) *Planning Policy Guidance 13: Transport*, paragraph 14, p. 8

*and services are primarily sited at the most accessible locations in the local area, or where accessibility will be improved as a result of the local transport plan provision or other measures that the local authority intends to take. This will require an integrated approach to plan location decisions, service delivery and transport provision.”*

- 3.2.31 PPG13 provides advice about employment in rural areas and transport, which is especially relevant to the context of Broxbourne. Paragraph 43 states:

*“In order to reduce the need for long-distance out-commuting to jobs in urban areas, it is important to promote adequate employment opportunities in rural areas. Diversification of agricultural businesses is increasingly likely to lead to proposals for conversion or reuse of existing farm buildings for other business purposes, possibly in remote locations. PPG7 indicates that for development related to agriculture and for farm diversification, appropriate new buildings may also be acceptable. In plan policies and development control decisions, local authorities should encourage farm diversification proposals particularly, but not exclusively, where this enables access by public transport, walking and cycling. They should be realistic about the availability, or likely availability, of alternatives to access by car.”<sup>22</sup>*

### **PPG15: Planning and the Historic Environment & PPG16: Archaeology and Planning (1990)**

- 3.2.32 The objectives of PPG15 are to identify and protect historic buildings and conservation areas, and other elements of the historic environment. It also explains the role the planning system plays in their protection and complements the guidance on archaeology in PPG16.<sup>23</sup>
- 3.2.33 The character, distinctiveness and setting of the historic environment in urban and rural areas need to be conserved and protected. There should be an assessment of the wider historic landscape and protection should be given to the most important components as well as encourage developments that maintain the overall historic character. The historic environment is also important for leisure and recreation.
- 3.2.34 PPG15 in the change of use section states that “advice on the planning aspects of re-use and adaptation of rural buildings is given in PPG 7 (paragraph 2.15 and Annex D). English Heritage has also issued guidance entitled *The Conversion of Historic Farm Buildings. Special considerations apply in Green Belts (see PPG 2).*<sup>24</sup> In rural areas “policies to strengthen the rural economy through environmentally sensitive diversification may be among the most important for its conservation”.<sup>25</sup>

<sup>22</sup> ODPM (2001) *Planning Policy Guidance 13: Transport*, paragraph 43, p. 16

<sup>23</sup> Department of Environment and Department of Heritage (1994) *Planning Policy Guidance 15: Planning and the Historical Environment*, paragraph 1.1, p. 6

<sup>24</sup> DoE and DH (1994) *PPG 15*, paragraph 2.19, p. 11

<sup>25</sup> DoE and DH (1994) *PPG 15*, paragraph 2.26, p. 12

- 3.2.35 PPG16 sets out policies on archaeological remains on land, and how they should be preserved and recorded both in an urban setting and in the countryside. *"Development plans should reconcile the need for development with the interests of conservation including archaeology. Detailed development plans (ie local plans and unitary development plans) should include policies for the protection, enhancement and preservation of sites of archaeological interest and of their settings. The proposals map should define the areas and sites to which the policies and proposals apply."*<sup>26</sup> Broxbourne has a number of Areas of Archaeological Interest and Scheduled Ancient Monuments marked on its Local Plan Proposals Map 2001-2011 (December 2005) that are sited within its Green Belt.

### **PPG17: Planning for Open Space, Sport and Recreation (2002)**

- 3.2.36 Open space, sport and recreation facilities can help improve the quality of people's lives. *"Planning permission may be granted in the Green Belt for proposals to establish or to modernise essential facilities for outdoor sport and recreation where the openness of the green belt is maintained."*<sup>27</sup> However non-essential facilities, where very special circumstances have not been demonstrated, should be considered inappropriate development that would harm the Green Belt. Particular advice is given on floodlighting and need to consider the protection of local amenity and where proposed towers or pylons are in the Green Belt to examine the impact on openness.<sup>28</sup>

### **PPG21: Tourism (1992) and A Planning Framework for Tourism (2006)**

- 3.2.37 This guidance was cancelled in 2006, but reference should be made to the Department for Community and Local Government (DCLG) Good Practice Guide to Planning for Tourism (July 2006). This provides advice on the value of tourism to the economy, suitable locations for attractions, enhancements, proactive planning, developing tourism strategies and plans, devising good tourism policies and access by sustainable means. Of particular relevance to Broxbourne is the development of rural tourism in regard to farm diversification and rural regeneration, which largely falls within the Green Belt.<sup>29</sup>

### **PPS22: Renewable Energy (2004)**

- 3.2.38 This guidance sets out the role of planning related to renewable energy policies and schemes. In terms of schemes in the Green Belts it states, *"elements of many renewable energy projects will comprise inappropriate development, which may impact on the openness of the Green Belt. Careful consideration will therefore need to be given to the visual impact of projects, and developers will need to demonstrate very special circumstances that clearly outweigh any harm by reason*

<sup>26</sup> ODPM (2001) *Planning Policy Guidance 16: Archaeology and Planning*, paragraph 15, p. 8

<sup>27</sup> ODPM (2002) *Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation*, paragraph 30, p. 7

<sup>28</sup> ODPM (2002) *PPG17*, paragraph 19, p. 5

<sup>29</sup> DCLG (2006) *A Planning Framework for Tourism*, paragraphs 3.24-3.25, pp. 20-21

*of inappropriateness and any other harm if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.”<sup>30</sup>*

## PPS25: Development and Flood Risk (2006)

- 3.2.39 This guidance instructs local planning authorities to consider flood risk alongside other spatial planning issues to avoid inappropriate development in areas of high risk of flooding. Local planning authorities should appraise, manage and reduce the risk of flooding in preparing DPDs as well as work in partnership with the Environment Agency and other operator authorities or stakeholders. There is a need to follow a sequential approach to demonstrate that there are no reasonably available sites with a lower probability of flooding for a particular land use when allocating land in LDDs.
- 3.2.40 PPS25 advises, under the heading of reducing risks, to make use of “opportunities offered by new development to reduce the causes and impacts of flooding e.g. surface water management plans; making the most of the benefits of green infrastructure for flood storage”.<sup>31</sup> In Broxbourne the Green Belt is a large part of the green infrastructure of the Borough and contains key areas of the floodplain that adjoins the built-up areas.

## Register of Surplus Public Sector Land

- 3.2.41 Communities and Local Government (CLG) identifies registers of surplus public sector land as a source of possible sites for inclusion in DDP. English Partnership has created and maintains The Register of Surplus Public Sector Land on behalf of the CLG and in collaboration with other government departments, their sponsor bodies and other public sector organisations. The Register provides a single reference point for all participating public sector organisations on the available national supply of surplus land and helps to ensure wider government objectives, including housing needs and regional economic and housing strategies factored into land disposal decisions. A wide range of public sector organisations have supplied information to the Register. Every three months English Partnerships publishes site details from the Register of Surplus Public Sector Land. The Register dated March 2007 included three sites that totalled 2.24 hectares in Hoddeson, Broxbourne, which are all owned by the Highways Agency and located within the Green Belt.<sup>32</sup>

<sup>30</sup> ODPM (2004c) *Planning Policy Statement 22: Renewable Energy*, paragraph 13, p. 11

<sup>31</sup> CLG (2006) *Planning Policy Statement 25: Development and Flood Risk*, paragraph , p.

<sup>32</sup> <http://www.englishpartnerships.co.uk/rpsl.htm>, The Register of Surplus Public Sector Land - September 2007

### 3.3 Regional Context

#### Draft East of England Plan

- 3.3.1 The Regional Spatial Strategy (RSS) for Broxbourne is the draft East of England Plan (EEP), which was published in 2004 and intended to cover the period up to 2021. The EEP is a spatial strategy to provide a framework for Local Authorities in the region to produce plans and strategies relating to land use. Once the final plan is approved it will provide the statutory framework for local authorities to produce their detailed development planning documents (DPDs).
- 3.3.2 The EIP Panel report was published in June 2006. In the Panel's report in regard to the Green Belt it states that "*for Broxbourne it is clear that the development in prospect will entail more local review of Green Belt boundaries*".<sup>33</sup> The Panel's recommended version of draft Policy SS7 "*would result in significant change in local terms, but we consider that they can be implemented without fundamentally eroding the principles and functioning of the Green Belt*".<sup>34</sup>
- 3.3.3 The Secretary of State's (SoS) decision on the EIP's Panel Report in regard to the Green Belt and Broxbourne is set out in the box below.

#### Policy SS7: Green Belt

The broad extent of Green Belts in the East of England is appropriate, and will be maintained. However, strategic reviews of Green Belt boundaries are needed in the following areas to meet regional development needs at the most sustainable locations:

- Stevenage, involving land in Stevenage and North Hertfordshire;
- Hemel Hempstead, involving land in Dacorum and probably St Albans District;
- Harlow, involving land in Harlow, East Hertfordshire and Epping Forest Districts; and
- Welwyn/Hatfield, involving land in Welwyn Hatfield District and potentially St Albans District.

A more local review will be required in Broxbourne.

These reviews will have to satisfy national criteria for Green Belt releases, accord with the spatial strategy, and ensure that sufficient land is identified to avoid the need for further review to meet development needs before 2031. ...<sup>35</sup>

<sup>33</sup> East of England RSS Panel (June 2006) East of England Plan Panel Report, paragraph 4.23, p. 28

<sup>34</sup> East of England RSS Panel (June 2006) East of England Plan Panel Report, paragraph 4.23, p. 28

<sup>35</sup> Government Office for the East of England (December 2006) *The Secretary of State's Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England and Statement of Reasons, Part 2: Modified Text of RSS incorporating Proposed Changes*, pp. 93-94

3.3.4 The SoS recommended supportive text to Policy SS7 is set out in the box below.

- |      |   |
|------|---|
| 3.29 | Extensive areas of the region are designated as Green Belt to constrain the growth of large urban areas, prevent coalescence, safeguard the countryside, preserve the setting of historic towns and assist urban regeneration. However the following exceptional circumstances justify strategic Green Belt reviews at the general locations identified in policy SS7: <ol style="list-style-type: none"><li>(1) Policy SS2 directs strategically significant development to major urban areas for sustainability reasons that apply equally to urban areas within as well as beyond the Green Belts. Tightly drawn Green Belt boundaries, while assisting urban concentration, have made it increasingly difficult to meet development needs, particularly for housing, resulted in greater dispersal of development and thereby contributed to unsustainable travel patterns;</li><li>(2) The scale of the region's housing needs and the aim to achieve a better balance between supply and demand in all areas, including in regard to the London Arc where demand is particularly strong and affordability problems particularly acute;</li><li>(3) In providing sustainable locations for growth, the former new towns to the north of London have:<ul style="list-style-type: none"><li>• a good record of balancing new housing with employment growth and are well-placed on strategic communications routes, making them both attractive for business investment and accessible to the London jobs market;</li><li>• relatively good existing infrastructure compared with smaller and older settlements, which further expansion can make efficient use of; and</li><li>• complex regeneration challenges, which the additional investment in infrastructure and services related to growth will contribute to addressing.</li></ul></li></ol> |
| 3.30 | The reviews will result in significant change locally but can be made without eroding the principles and overall functioning of the Green Belt.   |
| 3.31 | The local review in Broxbourne should support the regeneration of towns in the Lee valley while avoiding their coalescing further. <sup>36</sup>  |

3.3.5 What is made clear by Policy SS7 is that a local review of Broxbourne's Green Belt should be carried out and hence the purpose of this Green Belt Review. However it stresses that sufficient land is identified to meet all land use needs, so no further reviews or changes to the Green Belt should occur before 2031. This point is important in terms of the extent of potential changes to Broxbourne's Green Belt in order to avoid taking individual sites out of the Green Belt to meet various needs, such as housing, which has occurred in past plan periods. It suggests that the current Green Belt boundary that is tightly drawn around the built-up area will need to be carefully examined and, if necessary, altered to allow for long term future growth and a defensible boundary.

<sup>36</sup> GOEE (December 2006), Part 2: Modified Text of RSS incorporating Proposed Changes, pp. 94-95

3.3.6 The Panel's report also considered the London Arc West as a "complex polycentric area over which neighbouring Greater London has long exerted a powerful influence". It goes onto say that Broxbourne has a strong relationship with the Lee Valley area in London and East Hertfordshire, but not Harlow. Some key matters for the Borough are the Green Belt, green infrastructure and regeneration issues of the Lee Valley. On this basis the Panel recommended its inclusion in the London Arc new policy LA1 and text, which the SoS accepted with some modification (see box below).

### The London Arc

13.41 Excluding Essex Thames Gateway (which has related but distinct issues and is dealt with through its own sub-regional policies) the London Arc comprises the areas closest to and most strongly influenced by London. For the purposes of this RSS and its monitoring, it is defined as the whole of the districts of Broxbourne, Dacorum, Hertsmere, St Albans, Three Rivers, Watford, and Welwyn Hatfield within Hertfordshire and the districts of Brentwood and Epping Forest within Essex.

### Policy LA1: London Arc

(1) Within the London Arc Sub-Region the emphasis will be on:

- retention of long-standing Green Belt restraint, supported by more positive 'green infrastructure'
- use of neglected areas in accordance with Green Belt purposes; and
- urban regeneration, including the promotion of greater sustainability within the built-up areas,  
particularly measures to increase the use of non-car modes of transport. ...

13.43 The London Arc is a complex polycentric area of market towns, commuter settlements and 20th Century new towns over which London has a powerful influence. Long-standing Green Belt policies have sought to restrain the outward spread of the capital, and preserve the existing urban structure. These areas face a particular set of issues and pressures, which are distinct within the East of England but shared with parts of the South East.

13.44 The area is characterised by a generally buoyant economy, although there are pockets of poor performance and deprivation, particularly within the new towns. There is very strong housing demand and development pressures are intense. There is considerable pressure on the area's road and rail networks reflecting both the high levels of movement to and from London and the complex movements for shopping, employment, education, leisure etc between the towns. There is a need to strike a balance between the key priorities of restraining urban sprawl, enhancing the countryside and meeting development needs in sustainable ways. This will be done by retention and enhancement of the Green Belt and by accommodating development through a strong emphasis on effective use of the land within existing urban areas and selective Green Belt review.<sup>37</sup>

<sup>37</sup> GOEE (December 2006), Part 2: Modified Text of RSS incorporating Proposed Changes, p. 213

- 3.3.7 The numbers of jobs estimated for London Arc area are indicative targets that broadly align with housing. This is another important aspect for Broxbourne to consider in regard to the need for employment land, ability to accommodate it within the built-up area and potential impact on the Green Belt. The SoS recommended Policy E1 and text are set out in the box below.

**Policy E1: Job Growth 2001-2021**

The following indicative targets for net growth in jobs for the period 2001-2021 are adopted as reference values for monitoring purposes and guidance for regional and local authorities, EEDA and other delivery agencies in their policy and decision making on employment matters. Local development documents should provide an enabling context to achieve these targets. They may be revised through the review of RSS in conjunction with review of the Regional Economic Strategy or, exceptionally, through testing as part of LDD preparation.

**District groupings**

**Hertfordshire**

London Arc - Hertfordshire	
[Three Rivers/Watford/Hertsmere/	
Broxbourne/Dacorum/St Albans	
Welwyn Hatfield	50,000

North and East Herts including Stevenage  
[North Herts/Stevenage/E Herts] 18,000

**Total 68,000**

**EAST OF ENGLAND 452,000**

<sup>38</sup>

- 3.3.8 The Panel disagreed with the draft East of England Plan proposal for 2,500 dwellings in the Green Belt at Broxbourne because they felt it would add to the coalescence of existing urban edge of Broxbourne, Cheshunt and Hoddesdon and continuous urban sprawl for modest housing gains. This point was accepted by the SoS. Broxbourne assessed the Borough's urban capacity to be 4,710, which would deliver the bulk of draft Policy H1 allocation of 5,100. Whilst the Panel did not agree to a substantial increase in Broxbourne's housing allocation, it did decide there was capacity to increase draft Plan's Policy H1 by 500 dwellings, so Broxbourne's allocation would be 5,600 (280 per annum). The Panel confirmed that the detailed planning to meet this allocation is a matter for the LDF process. The SoS basically accepted this approach and recommended Policy H1 with specific reference to Broxbourne. Policy H1 is set out in the box below.

<sup>38</sup> GOEE (December 2006), Part 2: Modified Text of RSS incorporating Proposed Changes, pp. 102-104

### Policy H1: Regional Housing Provision 2001 to 2021

In the East of England as a whole provision will be made for at least 508,000 additional dwellings over the period 2001 to 2021.

District allocations in this policy should be regarded as minimum targets to be achieved, rather than ceilings which should not be exceeded.

Local planning authorities should seek as soon as possible to (a) achieve at least the annual average development rates for the period 2006 - 2021 and (b) make up any accumulated shortfall from 2001 onwards.

They should aim to exceed the annual average rates for 2006 - 2021 if more housing can be delivered without breaching environmental limits and infrastructure constraints, by:

- Increasing density, consistent with criteria in PPS3;
- Encouraging opportunities on suitable previously developed sites;
- Making best use of policies on exceptions sites to provide affordable housing in rural areas;

To plan for continuous delivery of housing for at least 15 years from the date of adoption, the first round of local development documents should make the assumption that the annual average rate of provision during the early years after 2021 will be the same as for 2006 to 2021.

The minimum regional housing provision will be distributed as follows:

#### Minimum Dwelling Provision, 2001 to 2021 (net increase, with annual average rates in brackets)

##### Broxbourne

Area / District Total to build April 2001 to March 2021	Of which already built April 2001- March 06	Minimum still to build April 2006 to March 2021
5,600	1,950 (390)	3,650 (240) <sup>39</sup>

- 3.3.9 It should be noted that the Government Office for the East of England announced on 13 June 2007 that further work will be conducted in order to assess the East of England Plan (Draft Alterations to the Regional Spatial Strategy for East of England) against the requirements of the European Habitats Directive. This will delay the East of England Plan, but the Government Office believes that this work needs to be considered before the Plan can be finalised.

<sup>39</sup> GOEE (December 2006), Part 2: Modified Text of RSS incorporating Proposed Changes, pp. 117-118

### 3.4 Local Context

#### Hertfordshire Structure Plan to 2016

- 3.4.1 Hertfordshire County Council reached the deposit stage with rolling forward the Hertfordshire Structure Plan to 2016. However due to the Planning and Compensation Act 2004, the review of the Structure Plan was abandoned as under the new system the Structure Plan is replaced by the RSS (East of England Regional Plan).

#### Hertfordshire Structure Plan Review 2001-2011, adopted April 1998

- 3.4.2 Hertfordshire's overall strategic policy framework for all the local authorities is contained in the Hertfordshire Structure Plan. However it should be noted that the final East of England Plan will eventually replace the Hertfordshire Structure Plan Review 2001-2011, which contains a number of 'saved' policies that should still be taken into account in planning decisions.
- 3.4.3 Policies 1 (Sustainable Development) and 5 (Green Belt) are not 'saved' policies, and thus are not material to planning decisions. However, they do provide a context in terms of the most recent county-level guidance on Green Belt issues. The Structure Plan states that "*the Green Belt now covers approximately 63% (81,317 area in hectares) of the County outside built-up areas*".<sup>40</sup> Policy 1 Sustainable Development emphasised that policies and local plans should be consistent with the principles of sustainable development. Policy 1 sets out eight general aims and the last aim will be to "*conserve the County's critical capital and other important environmental assets, including its landscape, ecological, built and archaeological heritage, and safeguard the County's area of Green Belt*".<sup>41</sup>
- 3.4.4 The Structure Plan explains that the Metropolitan Green Belt around London was first proposed in 1935 and the 1947 Town and Country Planning Act enabled Green Belt proposals to be incorporated into the first development plans. Government guidance was first published in 1955. This Structure Plan was prepared in accordance with PPG2 (1995). The Structure Plan Policy 5 Green Belt including safeguarded land is set out in the box below.

##### PREVIOUS STRUCTURE PLAN POLICY 5: GREEN BELT

**A Green Belt will be maintained in the south of the County as part of a Green Belt about 12-15 miles deep around London with limited extensions along main radial corridors and around towns, as indicated on the Key Diagram. ... The precise boundaries of the Green Belt, as modified in accordance with the following provisions of this policy, shall be as defined in district local plans.**

<sup>40</sup> Herefordshire County Council (adopted April 1998) *Herefordshire Structure Plan Review 1991-2001*, paragraph 46, p. 14

<sup>41</sup> Herefordshire County Council (adopted April 1998) *Herefordshire Structure Plan Review 1991-2001*, p. 29

***Boundary Reviews linked to Policies 6 and 7***

**Boundaries of the Green Belt around towns may be reviewed in local plans to identify settlements listed in Policy 6 [i.e. Broxbourne: Cheshunt, Hoddesdon and Waltham Cross] for the purposes of limited peripheral development under Policy 7 [i.e. through planned regeneration]. In addition, minor adjustments may be considered in reviews to secure a more sustainable pattern of development and activities within these settlements. ...**

***Safeguarded Land***

**Any land released from the Green Belt in accordance with this policy but not planned for development during the period of the local plan should be safeguarded in that Plan, and generally referred to as 'safeguarded land' or as an 'area of special restraint'.<sup>42</sup>**

....

- 3.4.5 Therefore previous Structure Plan policies in relation to the Green Belt did allow for some review and boundary alterations, especially if the change would result in more sustainable patterns of development and if linked to regeneration that would bring benefits to a town.

**Broxbourne Local Plan 2001-2011, adopted December 2005**

- 3.4.6 Broxbourne covers a relatively small area of land (54.6 sq km/20 sq mile). It is characterised by a dense urban corridor along the north-south axis of the Borough. The western area of the Borough is open countryside and is largely within the Metropolitan Green Belt. The eastern edge of the Borough adjoins the Lee Valley Corridor and is also within the Metropolitan Green Belt. A wide range of policy designations, such as landscape character, nature conservation and floodplain, covers both these areas of Green Belt.

- 3.4.7 “The Green Belt boundary proposed in this Plan has been redefined to:

- ensure that green belt protection continues to be afforded to land which meets the five stated purposes for including land within the green belt;
- protect the Borough’s most important landscape and wildlife habitats;
- be readily recognisable on the ground by following natural features or clear demarcation lines wherever possible;
- meet the needs of the Borough to 2011 where these cannot be met elsewhere from land within the urban area.”<sup>43</sup>

- 3.4.8 Broxbourne’s Local Plan policy states,

“GBC1 Revisions to Green Belt boundary

<sup>42</sup> Herefordshire County Council (adopted April 1998) *Herefordshire Structure Plan Review 1991-2001*, pp. 38-39

<sup>43</sup> Borough of Broxbourne (8th December 2005) *Local Plan Second Review 2001-2011*, paragraph 2.4.1, p. 35

*To provide for the development needs of the Borough as set out in Policies 5 and 7 of the adopted Hertfordshire Structure Plan Review 1991-2011, and to ensure a clearly identifiable and defensible Green Belt Boundary on the ground, the Council is making revisions to the existing Green Belt Boundary to exclude the following:*

- (I) Land adjacent to the North Bank of the rivers Lynch and Lee at Hoddeson, South Essex Road (see Employment and Education chapter)
- (II) Land at Hertfordshire Regional College, Turnford (see Employment and Education chapter).
- (III) Land at Cheshunt School, College Road, Cheshunt (see Employment and Education chapter).
- (IV) Land at Whitehaven, Burton Land and Primrose Cottage, St James (to ensure a clearly identifiable and defensible boundary).

*The resultant boundary of the Green Belt is defined on the proposals map.*

*Within the Green Belt there will be a presumption against development other than defined in Policy GBC2.<sup>44</sup>*

- 3.4.9 The Council reduced the number of changes to the Green Belt boundary from the First to Second Deposit. This was mainly due to the Urban Capacity Study (2002), which showed less land was needed for development to meet the Borough's needs. The remainder of Chapter 2: Green Belt and Countryside covers policies related to development within the Green Belt, agricultural uses, travelling showpeople sites, dwellings in the Green Belt, rural diversification and countryside protection policies.

Chapter 6 of the Local Plan sets out proposals for the development of Greater Brookfield, a predominant site to the west of the large urban area of Broxbourne which contains Canada Fields, Brookfield Farm and Brookfield Retail Park and the New River Trading Estate. Paragraph 6.1.2 of the Local Plan states that "the intention is to continue the development of Greater Brookfield as a centre for retail and indoor leisure uses".<sup>45</sup>

### **Borough of Broxbourne, Local Development Framework, Core Strategy, Issues and Options, May 2007**

- 3.4.10 The consultation period on the above document ran from 16 May to 27 June 2007. Theme 3: Green Belt and Countryside points out that the East of England Plan recommends a local review of Broxbourne's Green Belt as part of the LDF, "particularly where there are opportunities to contribute to the regeneration of the area. Any changes to the Green Belt boundary should be for the long term, which may mean looking beyond 2021".<sup>46</sup>

<sup>44</sup> Borough of Broxbourne (8th December 2005) *Local Plan Second Review 2001-2011*, p. 36

<sup>45</sup> Borough of Broxbourne (8th December 2005) *Local Plan Second Review 2001-2011*, p. 112

<sup>46</sup> Borough of Broxbourne (May 2007) *Local Development Framework; Core strategy; Issues and Options*, Theme 3: Green Belt and Countryside, p. 14

3.4.11 The objectives in the Community Plan include protection of wildlife sites, improving access, protection of the countryside from development, maintenance of the Green Belt to restrict sprawl and provision of green spaces. One issue raised by the local community is to resist the loss of any Green Belt land, lack of open space in Waltham Cross, improvements to sports pitches and connections to the local countryside, especially Lee Valley Park.

3.4.12 The options for the future related to the Green Belt and the countryside focus on three issues/questions:

- *"Issue 3.1 - What should be the criteria for reviewing sites in the Green Belt?*
- *Issue 3.2 - What approach should be taken with former nursery sites?*
- *Issue 3.3 - How should access to the green belt be encouraged for leisure purposes?*
- *Issue 3.4 - How should biodiversity in the Borough be conserved and enhanced?"*<sup>47</sup>

3.4.13 The Borough of Broxbourne will consider the responses to the four issues above along with the recommendations in this Green Belt Review in order to shape the LDF.

## 3.5 Conclusion

3.5.1 The following points can be drawn from the policy analysis.

- The advice contained in PPG2: Green Belts is key to formulating and informing the review of Broxbourne's Green Belt.
- The draft East of England Plan recommends the local review of Broxbourne's Green Belt boundaries in order to accommodate sustainable forms of development that will meet the needs of the local community.
- The Hertfordshire Structure Plan 2001-2011 policies 5-7 accepted some adjustments to the Green Belt in Broxbourne, especially to achieve limited development on the periphery of Cheshunt and Hoddeson that will assist regeneration objectives.
- The Borough of Broxbourne Local Plan Second Review 2001-2011 policy GBC1, in accordance with Structure Plan policies 5 and 7, set out four areas to be excluded from the Green Belt and proposed these areas for employment and educational uses as one area that would create a more defensible boundary. It is interesting to note that only small incremental changes were made to the Green Belt boundary to

<sup>47</sup> Borough of Broxbourne (May 2007) *Local Development Framework; Core strategy; Issues and Options*, Theme 3: Green Belt and Countryside, pp. 15-16

allow for more immediate development rather than looking to more long term future development needs of the Borough.

- Broxbourne's Core Strategy; Issues and Options, May 2007 discussed under Theme 3: Green Belt and Countryside raised three issues related to the review of the Green Belt. These comments should be considered as part of this review in order to gain a better understanding of the local people's views that have implications on Green Belt matters.
- 3.5.2 The present Green Belt Review has been undertaken to provide context and information to inform potential changes to the Green Belt in the future. Any changes would be done through Broxbourne's Development Planning Documents process.
- 3.5.3 The policy review highlights that Broxbourne will also need to consider:
- other national and regional statements, policies and plans for different types of development that may have an effect on the Green Belt;
  - other studies and documents, such as the Landscape Character Assessments, Housing, Employment or Educational Studies, Strategic Flood Risk Assessment and the Accommodation of Gypsies and Travellers in Northern and Eastern Hertfordshire report;
  - the Sustainability Appraisal, Strategic Environmental Assessment, Appropriate Assessment;
  - determine the amount of land required for development to meet the long term needs of the Borough including looking beyond 2021, which may mean the need to consider designating some safeguarded land; and
  - where land is shown to no longer meet Green Belt purposes and/or the boundary is weak then consideration will need to be given to potentially removal of land from the Green Belt and re-designation of the land that may include safeguarded land, environmental protection policies or allocation for development.

## 4 FUNCTIONAL REVIEW

### 4.1 Introduction

- 4.1.1 The fundamental aim of the Green Belt policy is to prevent urban sprawl and maintain the permanence and essential character of Green Belts (PPG2, paragraphs 1.4 and 2.1). However redefining Green Belt boundaries may be required to provide for future sustainable development, especially in line of recommended Policy SS7 in the draft East of England Plan.
- 4.1.2 It is important to understand the role of the existing Green Belt in Broxbourne before coming to a conclusion on the current function of Green Belt land in the Borough.

### 4.2 Role of Broxbourne Green Belt

- 4.2.1 Broxbourne shares a boundary with the London Borough of Enfield. It is located within the Metropolitan Green Belt, which was first proposed in 1935, and the 1947 Town and Country Planning Act, and enabled Green Belt proposals to be incorporated in the first development plans. The original Green Belt in Hertfordshire was based on proposals in Abercrombie's Greater London Plan of 1944. It covered a ring around the London that was south of a line roughly from Hemel Hempstead to St. Albans and Hertford. The Hertfordshire Structure Plan reviews have extended the Green Belt adding 5,000 hectares along the Stort corridor as far as Bishop's Stortford.
- 4.2.2 The primary role of the Metropolitan Green Belt is to stop the growth of London from continuously growing into the surrounding countryside. The Green Belt around Broxbourne is characterised by rural agricultural areas, open countryside with high landscape value and important natural areas. The Green Belt also contains Broxbourne Woods part of a Special Area of Conservation (SAC), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), the Lee Valley Corridor (includes a Special Protection Area (SPA) and RAMSAR site for their importance of the area for birdlife) plus 100 or so local wildlife significance. All these areas are marked on Broxbourne Local Plan Proposals Map.
- 4.2.3 On one hand Green Belts should aim to meet the five purposes (paragraph 1.5, PPG2) and on the other hand Green Belt land has a role to play in fulfilling the following objectives (paragraph 1.6, PPG2):
- *"to provide opportunities for access to the open countryside for the urban population;*
  - *to provide opportunities for outdoor sport and outdoor recreation near urban areas;*
  - *to retain attractive landscapes, and enhance landscapes, near to where people live;*
  - *to improve damaged and derelict land around towns;*

- *to secure nature conservation interest; and*
- *to retain land in agricultural, forestry and related uses".*

4.2.4 Paragraph 1.17 in PPG2 goes onto to advise that "*the extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within the green belt, or in its continued protection. ... The purposes of including land in Green Belts are of paramount importance to their continued protection, and should take precedence over the land use objectives*". It is important to keep this in mind in reviewing Green Belt land, so the quality and use is not mixed up with the core purposes of the Green Belt.

### 4.3 Existing Broxbourne Green Belt

4.3.1 Broxbourne Local Plan 2001-2011 defines the Council's objectives for their Green Belt and countryside. The Council aims:

- "(I) *to protect the countryside from unnecessary or inappropriate development;*
- (II) *to protect and enhance the appearance of the countryside and conserve and positively management important landscape features;*
- (III) *to increase and promote public access to the countryside;*
- (IV) *to afford appropriate degrees of protection to nationally and locally designated wildlife sites;*
- (V) *to provide a robust policy framework for tackling any remaining, or future, areas of dereliction; and*
- (V) *to ensure that any development which is considered appropriate in the green belt is carefully assimilated into the countryside by means of its siting, its very careful design and its good quality landscape.*"<sup>48</sup>

4.3.2 The Council objectives for its Local Plan Green Belt policies go beyond the advice contained in PPG2, but they are correctly designed to reflect local considerations as well as aspirations. The consultation on Broxbourne's Core Strategy consultation paper may reveal additional or different roles that the Green Belt performs or could perform in the future.

4.3.3 Broxbourne lies within the Metropolitan Green Belt that provides separation between London and surrounding countryside. Broxbourne's inner Green Belt boundary is drawn tightly around built-up areas.

4.3.4 The south eastern end of Broxbourne contains a built-up area of Waltham Cross that adjoins the M25 and then the built-up area continues into the London Borough of Enfield. Other than the definitive edge of the M25, this area did not benefit from controlling sprawl or preventing neighbouring areas from merging.

<sup>48</sup> Borough of Broxbourne (8th December 2005) *Local Plan Second Review 2001-2011*, paragraph 2.2.1, pp. 33-34

- 4.3.5 The northern edge of Broxbourne contains part of Hailey and Woolenbrook that are surrounded by Green Belt. The Green Belt in this area does provide a separation between Ware and Hertford.
- 4.3.6 The eastern edge of Broxbourne contains a thin strip of Green Belt that runs along side the Lee Valley Park where the Green Belt continues in Epping Forest District Council in the County of Essex. There are three Green Belt areas along the western side of the railway line and protrude into Broxbourne's built-up area.
- 4.3.7 The western area of Broxbourne contains the largest area of Green Belt along with landscape character areas and other natural conservation policy designations. There are three residential areas set within the Green Belt and the surrounding land provides a separation between Broxbourne and neighbouring Welwyn Hatfield. There are nature conservation areas, agricultural land holdings, farms, cemeteries, schools and various dispersed residential properties in the north-western area of Broxbourne.

## 4.4 Planning Decisions Related to the Green Belt

- 4.4.1 The Borough of Broxbourne stated that there were no planning or appeal decisions that related to the function or scope of this review of their Green Belt. The London Green Belt Council contains countrywide appeal decisions that relate to Green Belt matters that include a wide range of topics from agriculture to transport.<sup>49</sup> Most appeal decisions appear to relate to detailed local circumstances or fundamentally conflict with the advice contained in PPG2 in regard to openness and inappropriate development in the Green Belt.

## 4.5 Conclusion on Current Function of Broxbourne Green Belt

- 4.5.1 A visual examination of the shape and pattern of Broxbourne shows a tight inner Green Belt boundary around two built-up areas: the core built-up area along the A10 and a general extension of development to the west towards neighbouring Welwyn Hatfield. The tight boundary has resulted in encroachment and in some areas this has not maintained the degree of permanence that Green Belts should have. Over time this has also resulted in some areas of Green Belt land being surrounded by development on three sides hence reducing the overall openness. These areas have been examined in detail in Section 7.
- 4.5.2 Broxbourne's Green Belt beyond the built-up area is rural in nature with open lands and woodlands as well as farms, existing and former horticultural and stables and large institutions set within the Green Belt. On first examination, it appears that this pattern of development around areas, such as St. James and Goff's Oak, does not maintain the purpose or openness of the Green Belt. This is in part due to decline of the horticultural industry within Broxbourne, which subsequently led to many of the buildings, especially greenhouses, falling into disuse resulting in some being redeveloped. Also on a more detailed examination this pattern is more akin

<sup>49</sup> See <http://website.lineone.net/~greenbelt/appeals-%20agriculture.htm#top>, Broxbourne: stable refused for being major reconstruction in 2001

to 'existing villages' in the Green Belt and many large fields do in fact maintain the openness of the Green Belt, but not in an overall Borough wide scale. This is a reflection of local circumstances of Broxbourne's Green Belt, which must form the starting point for the review as well as relevant local methodology and criteria.

## 5 GREEN BELT STUDIES & BEST PRACTICE REVIEW

### 5.1 Introduction

5.1.1 It is interesting to note that the Government has never published any specific guidance on how to conduct a Green Belt review. Therefore in the absence of any specific government guidance on how to carry out such a review, the natural starting point is the advice contained in PPG2: Green Belts.

### 5.2 Green Belt Studies

5.2.1 There has been discussion about Green Belts in various studies, reports and debates. Some of the main parties to publish documents that have contributed to discussions about the Green Belt are:

- Martin Elson (1986, 1993, 2001 & 2002)<sup>50</sup>
- RTPI (2000 & 2002)<sup>51</sup>
- TCPA (1994, 1996 & 2002)<sup>52</sup>
- Scottish Executive (2004) Review of Green Belt Policy in Scotland
- Natural England (October 2007) Policy Position on Housing Growth and Green Infrastructure: Pre-scoping paper on Principles and
- Callcutt (November 2007) The Callcutt Review of housebuilding delivery.

5.2.2 The Callcutt review under the heading of Urbanisation and the Green Belt states:

*"A number of our contributors argued that, as urban development only accounts for a total of 11.2% of all land in England, there is no threat of "concreting over the countryside."*

<sup>50</sup> Elson, Martin, 1986, 'Green belts - conflict and mediation in the urban fringe', Heinemann, London  
Elson, Martin; Walker, S & MacDonald, R, 1993, 'The Effectiveness of Green Belts', report for the (former) Department of the Environment, HMSO, London..

Elson, Martin & Nichol, Lucy, 2001, 'Strategic Gap and Green Wedge Policies in Structure Plans Research Report', January, (Executive Summary from DETR, London, tel. (020) 7944 3973)  
<http://www.planning.detr.gov.uk/sqawpsp> (OFL on 21.2.01)

Elson, Martin & Nichol, Lucy, 2001.'Gaps and wedges versus belts' (on the Oxford Brookes University report for the DETR), Planning 1405, 9.2.01.

Elson, Martin & Downing, Lesley, 2002, 'Major Developed Sites: A Policy Review', Oxford Brookes University, May, available from Cassandra Blake, tel. (01865) 483491. (GP5511.ELS)

Elson, Martin, 2002, 'Modernising green belts - some recent contributions', Town and Country Planning 71 (10), November, pp266-267.

<sup>51</sup> Royal Town Planning Institute (RTPI) 'Green belt policy review: Discussion Paper', September 2000.  
'Modernising green belts: a discussion paper', May 2002 (Oversize Pamphlet GP5511 ROY)(OFL on 10.5.02) and 'Green Belts: A Fresh Approach', 2002.

<sup>52</sup> Town and Country Planning Association (TCPA), London: 'Inner Green Belt boundaries should be fixed', Town and Country Planning, May 1994. 'The People: Where Will They Go?', 1996. (OFL) 'Green Belts', Policy Statement, 2002. 'Turn Green Belts into 'Eco-Belts' say TCPA', Press Release, 3 August 2005.

*The threat is exaggerated; but the counter-argument can be challenged. 11.2% may not seem like a large proportion, but in Western Europe only the Netherlands and Belgium are more urbanised than England. Recent analysis by Land Use Consultants for the Campaign to Protect Rural England (CPRE) showed that between the 1960s and the 1990s the area of England suffering from visual and noise intrusion rose from 25% to 40% and by 2007 had reached 50%. The protection of the countryside is a legitimate concern to which public policy should respond.”<sup>53</sup>*

#### 5.2.3 Communities and Local Government Local Planning Authority Green Belt Statistics: England 2006 states:

*“In 2004 the area of Green Belt in England amounted to 1,678,200; however, in 2006 this is now 1,631,800 hectares. Taking into account the amount of Green Belt in New Forest District Council that became part of the New Forest National Park and the removal of Green Belt in Test Valley Borough Council due to the designation of the National Park (47,300 hectares), there has been a new increase of 900 hectares when compared with the 2004 Green Belt figures.”<sup>54</sup>*

### 5.3 Green Belt Reviews

#### 5.3.1 There are also Green Belt reviews that have been carried out for various local authorities and regions, such as:

- Edinburgh (Llewelyn-Davies 1998)
- Nottingham-Derby (Baker Associates 1999)
- Cambridge (Cambridge City Council & Cambridge Futures 2000 & Cambridge City Council 2002),
- South West Regional Assembly (Colin Buchanan 2006) Strategic Green Belt Review; Final Report
- Cheltenham (AERC 2007)

#### 5.3.1 The review of literature provides examples of good practice, methodology, criteria and lessons learned. The most relevant elements have been extracted to shape and inform the approach to the review of Broxbourne’s Green Belt.

#### 5.3.2 What the literature review revealed is that it is important to adapt the methodology and criteria, so it reflects local circumstances and the defined scope of the review. It is vital that the methodology is sound, which generally means that it should be based around assessment of the Green Belt purposes in paragraph 1.5 in PPG2. The criteria used to assess Green Belt land are generally designed to be SMART (Specific, Measurable, Achievable, Realistic and Time-base) along with a reality check or public consultation to ensure the criteria reflect the situation on the ground.

<sup>53</sup> Callcutt Review Team (2007) *The Callcutt Review of housebuilding delivery*, Chapter 5- Viability and Potential, p. 44

<sup>54</sup> Communities and Local Government and National Statistics (31 January 2007) *Local Planning Authority Green Belt Statistics*, Statistical Release GB-2006, p. 2

5.3.3 The recommendations from this Green Belt review only forms part of the evidence base in which the Borough of Broxbourne needs to consider in shaping the sustainable pattern of development to meet current and future needs. It is important to understand why a single issue review of the Green Belt is being conducted. This would allow the overall scope of the review to be better defined and understood. In the case of Broxbourne, the East of England Plan recommended a local Green Belt review in order to assist with regeneration, which is a fairly unspecific and wide ranging topic. On the face of it Broxbourne's Green Belt review is not necessarily needed to meet large scale needs, such as for housing or employment. However there seems to be a need to contribute to sustainable development objectives, regenerations of horticultural areas, improve land management, creation of linked green infrastructure, better definition of defensible boundaries and safeguarding land for longer term development needs to secure the permanence of the Green Belt.

## 6 GREEN BELT REVIEW METHODOLOGY & CRITERIA

### 6.1 Introduction

- 6.1.1 The methodology and criteria for this Green Belt Review was developed through discussions with the Borough of Broxbourne planning officers and a questionnaire sent to key stakeholders. The comments and proposed changes resulting from the consultation on the draft questionnaire are available on request from Broxbourne Borough Council.
- 6.1.2 The Borough of Broxbourne planning officers agreed the final methodology and criteria proposed by Scott Wilson that were used to conduct the desk based and field assessment of Green Belt land. The final methodology and criteria are attached in Appendix 1.
- 6.1.3 All Green Belt land has been judged against three of the five purposes of the Green Belt as defined in PPG2 (see Section 5.4 for an explanation of why Purposes 4 and 5 will not be tested), and has been assessed in terms the strength of the boundary. Those sub areas that were found to be weak in meeting Green Belt purposes were then subjected to an additional assessment of development constraints and sustainable development opportunities (see Section 7).

### 6.2 Methodology for Defining Areas & Sub Areas

- 6.2.1 The Green Belt land was divided into areas and sub areas to make the review more manageable and to ensure that all land is assessed in a fair and transparent manner. This also enabled the review to make a recommendation on each sub-area.
- 6.2.2 The areas themselves do not have specific meaning, but are used as a management tool to ensure all land in the Green Belt is examined. The sub-division of land is based on physical features listed in the criteria below.
- 6.2.3 The division of areas into sub-areas will generally adhere to the following criteria:
- OS parcels not split and where possible major development curtilages to be included as a separate sub-area;
  - sub-areas should generally be of similar character and land use (e.g. recreation, agriculture, etc);
  - sub areas should not cross area boundaries;
  - sub areas should not cut across motorways, A, B or C classified roads or railway lines;
  - no woodland or main areas of trees should be split between sub- areas;
  - sub areas where possible should not cross main rivers, streams or flood land;
  - sub areas where possible should not cross strong hedgerows denoting field boundaries;
  - existing housing, defined settlement areas and urban developments should not be split between sub-areas;

- sub areas should take account of significant changes in landscape and landform;
- sub areas may be smaller where they are located close to existing development or protrude into the built-up area.

## 6.3 Criteria for Boundary analysis

- 6.3.1 Paragraph 2.9 of PPG2 advises that boundaries should be clear and based on strong physical features. The criteria used to divide Green Belt land adhere to criteria that ensure parcels of land respect clear geographical boundaries: Paragraph 2.9 of PPG2 further advises that Green Belt “*boundaries should be clearly defined, using readily recognisable features such as roads, streams, belts of trees or woodland edge*”.
- 6.3.2 In analysing Green Belt boundaries, the boundaries of each Green Belt area have been categorised into ‘strong’ and ‘weak’, depending on the permanence and resilience of the boundary.
- 6.3.3 Analysis of aerial photographs, maps and fieldwork were used to determine the boundary categories. If a boundary was found to be ‘strong’ then it would be viewed as defensible for the foreseeable future. If a boundary was found to be ‘weak’ then the assessment would work outwards to establish where there were potentially any ‘strong’ boundaries, especially where it would link to the existing Green Belt boundaries in a seamless or neat manner. This is intended to inform potential alterations to the Green Belt boundaries that would make them defensible over the longer term.
- 6.3.4 The classification of a boundary was based on:
- a ‘strong’ boundary is one that will remain over the long term and is extremely difficult to alter or destroy, especially by planning decision or appeal;
  - a ‘weak’ boundary is one that is visible, but can be easily altered or destroyed by physical means or by planning decision or appeal.
- 6.3.5 Table 6.3.1 below sets out how Green Belt boundaries were classified, reflecting the principles set out above.

Strong	Weak
Motorways	
Functioning mainline railway lines	Disused railway lines
District distributor roads forming boundary (not bisecting Green Belt)	Other classified roads Private/unmade roads Rights of way
Rivers, watercourses and significant drainage features	Park boundaries
Prominent physical features (i.e. ridgeline, non-intermittent waterways)	Power lines
Protected hedgerows / woodlands	Tree-lines public footpaths Non protected hedgerows / woodlands
Residential settlements with clear define physical boundaries (not back gardens)	Residential curtilages / back garden  Non-residential development with weak or indeterminate boundaries
Other development with strong established boundaries	Recreational field boundaries
	Cemeteries

Table 6.3.1 Defensible Boundary Classification

- 6.3.6 The results of the boundary assessment have informed potential alterations that would make the Green Belt boundaries permanent and defensible over a long period. These results are set out in Section 7.5.

## 6.4 Criteria for Purpose Analysis

- 6.4.1 Points have been awarded for each purpose against specific criteria, in order to assess the contribution of each Green Belt sub area in a consistent manner. This section sets out how the Review assessed Green Belt sub areas in the context of the five Green Belt purposes set out in PPG2:

- check the unrestricted sprawl of large built-up areas;
- prevent neighbouring towns from merging into one another;
- assist in safeguarding the countryside from encroachment;
- preserve the setting and special character of historic towns;
- assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

### Purpose 1 - Check the unrestricted sprawl of large built-up areas

- 6.4.2 The assessment awards points to those areas of Green Belt that stop development from taking place in a direction that would represent sprawl into open Green Belt, or between *existing distinct settlements* (see Glossary) that would lead to the unrestricted loss of Green Belt land, or the agglomeration of built settlements. These scenarios reflect the Broxbourne context, which contains a number of settlements,

which, although not towns, are distinct and are at serious risk of coalescence as a result of previous incremental development that has taken place in the Broxbourne Green Belt (see Section 5). The scenarios also help to establish where Green Belt land helps to check unrestricted sprawling development by keeping land permanently open.

6.4.3 Five points were therefore awarded to Green Belt sub areas that:

- provide a barrier between an existing *large urban area* and open green belt; OR
- are surrounded by Green Belt land on all sides; OR
- provide a barrier between two or more *distinct existing settlements*.

6.4.4 No points were awarded to sub areas that provide a barrier between two or more parts of the same large urban area.

#### **Purpose 2 - Prevent neighbouring towns from merging into one another**

6.4.5 This criterion gives the most points to those areas of Green Belt land that provide a crucial buffer between *distinct existing settlements*. This reflects the value of Green Belt land in preventing separate settlements from merging (see also paragraph 6.4.2 above).

6.4.6 Points were therefore awarded according to distance between *distinct existing settlements* that each Green Belt sub area separates. Points were awarded on a sliding scale, with maximum points awarded to those sub areas that separate distinct settlements that are under 0.5 kilometres apart, and just one point awarded to those sites separating distinct settlements that are over 2 kilometres apart.

#### **Purpose 3 - Assist in safeguarding the countryside from encroachment**

6.4.7 This criterion gives the most points to those areas that perform clear countryside purposes. This reflects the key importance of Green Belt designations in preventing encroachment on land of countryside value, whilst enabling further scrutiny of those areas of land that are not of clear countryside value.

6.4.8 Points were awarded according to the relative significance of each sub area in terms of nature conservation value (i.e. international, national or local nature designations), trees (i.e. whether each sub area contains protected woodland or trees, or contains any tree cover), greenfield land (i.e. whether land is greenfield or brownfield), and agriculture (i.e. agricultural grade of land). For each of these areas, five, three or 0 points were awarded, depending on the significance of the features within the site.

#### **Purpose 4 - Preserve the setting and special character of historic towns**

6.4.9 This criterion was not assessed because Broxbourne is not a historic town and therefore this PPG2 criterion does not apply to the Borough. A number of consultees agreed that this purpose does not apply to the context of Broxbourne. It is recognised that the Borough does contain a number of conservation areas, some of which are adjacent to the Green Belt. These have been assessed as part of the

development constraints of land in sub-areas that performs poorly against the Green Belt purposes.

**Purpose 5 - Assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

- 6.4.10 It is unnecessary to score land against this purpose. All land within the Green Belt assists with this purpose, as the vast majority of built development is to be located in the urban area in accordance with site allocations and government advice. There is also a general presumption against inappropriate development within the Green Belt. Therefore all Green Belt land would gain the same score. However, after all Green Belt land is scored, then areas that have a low score will then be assessed against environmental constraints and opportunities that will include derelict land, and the potential of the land to assist in urban regeneration.

## 6.5 Weighting of scores

- 6.5.1 Green Belt Purpose 3 has more definable criteria, which would result in a higher total number of points (Purposes 1 and 2 have a maximum of 5 points whereas Purpose 3 has a maximum of 20 points). If the scores were not weighted, then Purpose 3 would always come out as the most important purpose. In order to address this issue, a weighting system will be applied to ensure that each purpose holds equal importance in the initial scoring exercise. The chart below shows the values to allow Green Belt purposes to be weighted.

Green Belt purpose	1	2	3
Maximum points per purpose	5	5	20
Weight	1	1	0.25
Equalising Value	5	5	5

Table 6.5.1 Weighting of Scores

## 6.6 Summary

- 6.6.1 The methodology for the Review has been formulated in consultation with key stakeholders and close collaboration with the Borough of Broxbourne planning officers.
- 6.6.2 Broxbourne's Green Belt has been split up into broad Areas, which are themselves split up into sub-areas in order to make assessment more manageable and analysis more clear.
- 6.6.3 The assessment is essentially separated into three key stages:
  - 1) assessment of Green Belt land against three of the five Green Belt purposes;
  - 2) the assessment of the strength of the current inner Green Belt boundary; and
  - 3) an assessment of the constraints and sustainable development opportunities to inform an appropriate policy approach to land that is proposed to be removed from the Green Belt.

## 7 RESULTS AND ANALYSIS

### 7.1 Green Belt Purposes and Boundaries

- 7.1.1 The results are analysed for each of three Green Belt purposes in Sections 7.2 - 7.5. Appendix 2 provides the details of all three purposes by sub area. Appended Maps 1-3 show the result of each Green Belt purpose. Map 4 shows the combine results for all three Green Belt purposes. The purpose section is followed by Section 7.5 that examines the strength and weakness of the Green Belt boundary. Appendix 4 provides the detailed assessment of the inner Green Belt boundary whilst appended Map 5 shows the location of weak Green Belt boundaries.

### 7.2 Green Belt Purpose 1: to check the unrestricted sprawl of large built-up areas

- 7.2.1 This section discusses the performance of each Green Belt Area against Green Belt Purpose 1. Appendix 2 shows the detailed results of all three purposes by sub area. Appended Map 1 shows how each sub area performs against Purpose 1 across the Borough as a whole.

#### Purpose 1 - Green Belt Area A

- 7.2.2 The vast majority of sub areas in Green Belt Area A successfully perform a valuable Green Belt purpose.
- 7.2.3 Green Belt Area A is predominantly located in an area of open Green Belt, meaning that many sub areas either provide a barrier between the urban area of Broxbourne and the open Green Belt, or are located further away from the urban area, and area surrounded by Green Belt land on all sides. These sub areas therefore play an important function in preventing the open Green Belt from being subject to sprawl.

Criterion	Definition	Number of sub areas	Points
Role of Green Belt area in preventing sprawl from taking place	Provides a barrier between an existing <i>large urban area</i> and open green belt;	11	5
	Is surrounded by Green Belt land on all sides;	7	5
	Provides a barrier between two or more <i>distinct existing settlements</i> ;	3	5
	Provides a barrier between two or more parts of the same large urban area.	5	0

Table 7.1.1 Green Belt Purpose 1 - Area A

- 7.2.4 A small number of sub areas also prevent sprawl between the large urban area of Broxbourne and the distinct existing settlement in Hertford Heath. These are located to the very north east of the Borough, close to Hertford Heath (which is located outside the Borough).
- 7.2.5 The irregular shape of the boundary of the large urban area of Broxbourne means that there are a number of areas where Green Belt land is enclosed by built development, and therefore does not perform a purpose in preventing unrestricted sprawl:
- To the very north-west, existing homes and a Local Plan housing allocation strongly enclose sub areas A5 and A6.
  - In the Hoddesdon area, two Sub Areas (A20 and A21) present a barrier between two existing parts of the same urban area.
  - Sub area A12 is also enclosed by housing on three sides.

### Purpose 1 - Green Belt Area B

- 7.2.6 The vast majority of the sub areas in Green Belt Area B again successfully perform a valuable Green Belt purpose. This Green Belt Area is located to the west of the Borough, and lies between the large urban area of Broxbourne and open green belt land to the north and west. Sub-areas therefore predominantly provide a barrier between the urban area and the open Green Belt, or are themselves surrounded by Green Belt land on all sides.

Criterion	Definition	Number of sub areas	Points
Role of Green Belt area in preventing sprawl from taking place	Provides a barrier between an existing <i>large urban area</i> and open green belt;	13	5
	Is surrounded by Green Belt land on all sides;	8	5
	Provides a barrier between two or more <i>distinct existing settlements</i> ;	0	5
	Provides a barrier between two or more parts of the same large urban area.	0	0

Table 7.1.2 Green Belt Purpose 1 - Area B

- 7.2.7 Just one of the Green Belt Areas separates two parts of the same urban area. A small section of Green Belt Sub Area B5 lies between two parts of the urban area, and therefore represents a partially enclosed space.

### Purpose 1 - Green Belt Area C

- 7.2.8 The vast majority of the sub areas in Green Belt Area C successfully perform a valuable Green Belt purpose. This Green Belt Area is located between the large urban area of Broxbourne and Cuffley, and also contains a number of smaller, clustered settlements. The majority of the Green Belt Sub Areas therefore perform the purpose of separating at least two distinct settlements, preventing unrestricted sprawl between them.

Criterion	Definition	Number of sub areas	Points
Role of Green Belt area in preventing sprawl from taking place	Provides a barrier between an existing <i>large urban area</i> and open green belt;	10	5
	Is surrounded by Green Belt land on all sides;	2	5
	Provides a barrier between two or more <i>distinct existing settlements</i> ;	23	5
	Provides a barrier between two or more parts of the same large urban area.	2	0

Table 7.1.3 Green Belt Purpose 1 - Area C

- 7.2.9 To the north of the Green Belt Area, a small number of Green Belt Sub Areas are located between the large urban area of Broxbourne and the open Green Belt. Thus 10 sub-areas in this location perform the purpose of providing a barrier between an existing large urban area and open green belt. In this open location, two sub-areas are also surrounded on all sides by Green Belt land.
- 7.2.10 Sub area 33 and sub area C32 separate two parts of the same settlement- the Goffs Oak area.
- 7.2.11 Further, it is considered that small sections of three sites separate two or more parts of the same large urban area of Broxbourne (sub area C17, C19 and C20). Although this is not sufficient to make the whole sub-area lose points, it raises the option of realigning the boundary. These small areas currently represent enclosed spaces that do not play a role in preventing unrestricted urban sprawl.

### Purpose 1 - Green Belt Area D

- 7.2.12 Land in Green Belt Area D performs a number of purposes in terms of preventing urban sprawl. This is because it has land next to the large urban area of Broxbourne, close to other distinct existing settlements, and also next to and within the open Green Belt.

Criterion	Definition	Number of sub areas	Points
Role of Green Belt area in preventing sprawl from taking place	Provides a barrier between an existing <i>large urban area</i> and open green belt;	6	5
	Is surrounded by Green Belt land on all sides;	11	5
	Provides a barrier between two or more <i>distinct existing settlements</i> ;	8	5
	Provides a barrier between two or more parts of the same large urban area.	4	0

Table 7.1.4 Green Belt Purpose 1 - Area D

- 7.2.13 To the north of the Green Belt Area, sub areas contribute to the separation of the large urban area of Broxbourne, Burton Lane/ Goffs Lane and Goffs Oak. Further to the south and east, sub areas separate the large urban area of Broxbourne from the open Green Belt to the west.

7.2.14 A number of sub areas in the south west of the Green Belt Area are located in the open Green Belt, and are therefore surrounded on all sides by Green Belt land.

7.2.15 Four sub areas, adjacent to the large urban area of Broxbourne, separate two parts of the same urban area.

### Purpose 1 - Green Belt Area E

7.2.16 Green Belt Area E plays an important role in providing a barrier to the east of the Borough, preventing the large urban area of Broxbourne from sprawling eastwards into neighbouring settlements and open Green Belt land outside of the Borough.

Criterion	Definition	Number of sub areas	Points
Role of Green Belt area in preventing sprawl from taking place	Provides a barrier between an existing <i>large urban area</i> and open green belt;	9	5
	Is surrounded by Green Belt land on all sides;	0	5
	Provides a barrier between two or more <i>distinct existing settlements</i> ;	18	5
	Provides a barrier between two or more parts of the same large urban area.	1	0

Table 7.1.5 Green Belt Purpose 1 - Area E

7.2.17 Green Belt Area E is tightly knit to the eastern edge of the large urban area of Broxbourne. As such, no sub- areas are surrounded on all sides by Green Belt land.

7.2.18 The Green Belt Sub Areas towards the north and to the very south of Green Belt Area E provide an important barrier between Broxbourne and a number of small distinct settlements to the east of the Borough. These settlements include St Margarets to the north east, and Lower Nazeing to the east, as well as a number of smaller settlements. To the south east is the larger urban area of Waltham Abbey.

7.2.19 A number of Green Belt Sub Areas also provide a barrier between the large urban area of Broxbourne and The Lee Valley Park, a large expanse of open space between Lower Nazeing and Waltham Abbey.

7.2.20 Just one Green Belt Sub Area does not perform a clear role in preventing sprawl. Sub Area E15 is effectively enclosed on three sites by the large urban area of Broxbourne.

### Purpose 1 - Overview of Results

#### The Function of the Green Belt in Broxbourne against Green Belt Purpose 1

7.2.21 The Green Belt of Broxbourne checks the unrestricted sprawl of built up areas within the Borough in a number of ways. Towards the north west of the Borough, the Green Belt provides a barrier between the large urban area of Broxbourne and the open Green Belt, maintains the open character of the open Green Belt, and separates the urban area of Broxbourne from Hertford Heath.

- 7.2.22 To the south west of the Borough, Green Belt land separates a cluster of distinct existing settlements between the large urban area of Broxbourne and Cuffley to the west of the Borough. It also provides a barrier between the large urban area of Broxbourne and the open Green Belt to the south and west, and further away from the urban area, maintains the open character of the open Green Belt.
- 7.2.23 To the East of the Borough, the large urban area of Broxbourne neighbours Green Belt land which forms part of the Lee Valley Regional Park, and provides a barrier between the large urban area of Broxbourne and a number of distinct settlements to the north-east and south-east of the Borough boundary. It also checks unrestricted sprawl into the open Green Belt towards the middle of the eastern side of the Borough.

Sites that do not perform a clear role under Purpose 1

- 7.2.24 The research has found that there is a small number of Green Belt sites that do not perform a clear purpose in preventing urban sprawl, instead separating land within the same urban area. These are all located around the edge of the large urban area of Broxbourne.

Whole sites	Parts of sites
A5 and A6	B5
A12	C17
A20	C19
A21	C20
C32	
C33	
D6, 7 and 8	
D13	
E15	

Table 7.1.6 Green Belt Purpose 1 - Summary of poorly performing sub areas

### 7.3 Green Belt Purpose 2: To prevent neighbouring towns from merging into one another

- 7.3.1 This section discusses in detail the performance of each Green Belt Area against Purpose 2. Appendix 2 shows the detailed results of all three purposes by sub area. Appended Map 3 shows how each sub area performs against Purpose 2 across the Borough as a whole.

#### Purpose 2 - Green Belt Area A

- 7.3.2 The majority of sub areas in Green Belt Area A achieve low scores for this purpose, reflecting the location of the area, much of which faces onto open Green Belt land to the west.

Criterion	Definition	Number of sub areas	Points
Shortest distance between the two (or more) <i>distinct existing settlements</i> (both within or outside the Borough) that the Green Belt area separates	i. 0 – 0.5 km	1	5
	ii. 0.5 – 1 km	9	4
	iii. 1 – 1.5 km	1	3
	iv. 1.5 – 2 km	3	2
	v. > 2 km	12	1

Table 7.2.1 Green Belt Purpose 2 - Area A

- 7.3.3 Sub areas to the north of the Area achieve higher scores. This is because of their location between the large urban area of Broxbourne and housing in Hertford Heath.

### Purpose 2 - Green Belt Area B

- 7.3.4 Green Belt Area B is located between the large urban area of Broxbourne and the open Green Belt to the west. As such, none of the Sub Areas within Green Belt Area B separate distinct settlements that are within 2 kilometres of one another. Thus none of the sub areas secure additional points under Green Belt Purpose 2.

Criterion	Definition	Number of sub areas	Points
Shortest distance between the two (or more) <i>distinct existing settlements</i> (both within or outside the Borough) that the Green Belt area separates	i. 0 – 0.5 km		5
	ii. 0.5 – 1 km		4
	iii. 1 – 1.5 km		3
	iv. 1.5 – 2 km		2
	v. > 2 km	21	1

Table 7.2.2 Green Belt Purpose 2 - Area B

## Purpose 2 - Green Belt Area C

- 7.3.5 The majority of sub areas in Green Belt Area C achieve high scores in relation to Purpose 2. This is due to the proximity of these sub areas to a number of distinct existing settlements, including the large urban area of Broxbourne to the east, Cuffley (outside of the Borough) to the west and, in between, a cluster of smaller settlements.

Criterion	Definition	Number of sub areas	Points
Shortest distance between the two (or more) <i>distinct existing settlements</i> (both within or outside the Borough) that the Green Belt area separates	i. 0 – 0.5 km	18	5
	ii. 0.5 – 1 km	9	4
	iii. 1 – 1.5 km	0	3
	iv. 1.5 – 2 km	2	2
	v. > 2 km	8	1

Table 7.2.3 Green Belt Purpose 2 - Area C

- 7.3.6 It is the proximity of these settlements, and the role of the Green Belt sub areas as barriers between them, that gives the majority of the sub areas in Green Belt Area C such high scores under this Green Belt purpose.
- 7.3.7 The few sub areas with low scores in this Green Belt area are located to the north of the area, where there are no distinct existing settlements.

## Purpose 2 - Green Belt Area D

- 7.3.8 Sub Areas within Green Belt Area D are more varied in terms of their relationship with surrounding settlements:
- Towards the north of the Green Belt Area, sub areas provide a barrier between the distinct settlements of Goffs Oak, Burton Lane/ Goffs Lane and the large area of Broxbourne.
  - Towards the south east, sub areas provide a barrier between the large urban area south of Broxbourne and the large urban area of Broxbourne itself.
  - Towards the south and south west of the Green Belt Area, the area separates existing settlements in Broxbourne and the open Green Belt, and therefore do not have a role in preventing neighbouring towns from merging.

Criterion	Definition	Number of sub areas	Points
Shortest distance between the two (or more) <i>distinct existing settlements</i> (both within or outside the Borough) that the Green Belt area separates	i. 0 – 0.5 km	4	5
	ii. 0.5 – 1 km	5	4
	iii. 1 – 1.5 km	6	3
	iv. 1.5 – 2 km	6	2
	v. > 2 km	7	1

Table 7.2.4 Green Belt Purpose 2 - Area D

## Purpose 2 - Green Belt Area E

- 7.3.9 The majority of sub areas in Green Belt Area E perform a strong role in separating the large urban area of Broxbourne from other, distinct existing settlements outside of the Borough boundary.

Criterion	Definition	Number of sub areas	Points
Shortest distance between the two (or more) <i>distinct existing settlements</i> (both within or outside the Borough) that the Green Belt area separates	i. 0 – 0.5 km	15	5
	ii. 0.5 – 1 km	7	4
	iii. 1 – 1.5 km	4	3
	iv. 1.5 – 2 km	0	2
	v. > 2 km	2	1

Table 7.2.5 Green Belt Purpose 2 - Area E

- 7.3.10 Towards the north and south of this Green Belt Area, there are a number of settlements on the other side of the Borough boundary, many of which are located close to the urban area of Broxbourne. Towards the north are a number of smaller distinct settlements, and to the south is the larger urban area of Waltham Abbey. The high scores achieved by the sub areas towards the north and to the very south of Green Belt Area E reflect their role in separating these settlements.

- 7.3.11 Four Green Belt Sub Areas around the middle of the Green Belt Area (sub area D24 to 27) separate the large urban area of Broxbourne from the open Green Belt, and as such achieve low scores against this Green Belt purpose.

## Purpose 2 - Overview of Results

### The Function of the Green Belt in Broxbourne against Green Belt Purpose 2

- 7.3.12 The research has indicated that the Green Belt of Broxbourne prevents neighbouring distinct settlements from merging into one another in a number of specific locations:

- Towards the north-west of the Borough, the Green Belt predominantly provides a barrier between the large urban area of Broxbourne and the housing in Hertford Heath.
- To the mid-west of the Borough, the Green Belt provides a barrier between the large urban area of Broxbourne, a number of smaller clustered settlements, and the village of Cuffley, to the west of the Borough.
- To the south west of the Borough, Green Belt land provides a barrier between the large urban area of Broxbourne, the M25 and Enfield, to the south.
- To the east of the Borough, the large urban area of Broxbourne neighbours Green Belt land which forms part of the Lee Valley Regional Park, and provides a barrier between the large urban area of Broxbourne and a number of settlements to the east of the Borough.

*Sub Areas that do not perform a clear role under Purpose 2*

- 7.3.13 The research has found that a number of Green Belt sub areas do not perform a clear purpose in terms of separating existing settlements.
- 7.3.14 The majority of these are located in areas where the large urban area of Broxbourne moves into large areas of open Green Belt, where there are no further settlements against which to provide a barrier. These tend to be located towards the north-west, very south west and mid-east of the Borough.
- 7.3.15 As shown against Green Belt Purpose 1, there is also a small number of sub areas that provide a barrier between two parts of the same settlement, and thus in practice play little part in separating distinct settlements. These are located around the edge of existing settlements and are spread around the Borough.
- 7.3.16 Sites that do not perform a clear role under Purpose 2 (i.e. achieve a score of two or less are:
- Green Belt Area A: A7, A8, A14-26
  - Green Belt Area B: B1-21
  - Green Belt Area C: C2-C9, C36 and C37
  - Green Belt Area D: D10, D11, D15, D16D19-D26, D28
  - Green Belt Area E: E25, E26

## **7.4 Green Belt Purpose 3: To assist in safeguarding the countryside from encroachment**

- 7.4.1 This section discusses in detail the performance of each Green Belt Area against Purpose 3. Appendix 3 is the detailed results of Purpose 3 on countryside value by sub area. Appended Map 4 shows how each sub area performs against Purpose 3 across the Borough.

### **Purpose 3 - Green Belt Area A**

- 7.4.2 The sub areas in Green Belt Area A achieve moderate results in terms of countryside value, with all but two sub areas achieving scores between 6 and 14 out of a possible 20. One sub area achieves a score of 16, whilst another scores just three.

<b>Criterion</b>	<b>Definition</b>	<b>Number of sub areas</b>	<b>Points</b>
a) Nature conservation value	i. Yes – statutory nature conservation designation	1	5
	ii. Yes – local nature conservation designation	4	3
	iii. No specific nature designation	21	0
b) Trees and woodland	i. Yes – ancient or protected woodland, forests, trees or hedgerows	9	5
	ii. Yes – unprotected trees	17	3
	iii. No trees present	0	0
c) Greenfield land	i. Greenfield land	12	5
	ii. Predominantly Greenfield land (over 50%)	5	3
	iii. Previously developed land (brownfield)	9	0
c) Agriculture	i. Grade 1 or 2		5
	ii. Grade 3 or below	25	3
	iii. No agricultural use	1	0

**Table 7.3.1 Green Belt Purpose 3 - Area A**

- 7.4.3 The significant majority of sub areas do not contain- and are not within- designated areas of nature conservation. However, sub area 23 contains an SAC and SSSI (Wormley-Hoddesdonpark Wood North), as well as a number of designated local wildlife sites. This comparatively large sub area is therefore of highly significant value in nature conservation terms.
- 7.4.4 Four further sub areas contain local wildlife sites. These are located to the north-west of Green Belt Area A, immediately north of sub area A23.
- 7.4.5 A number of sub areas in Green Belt Area A contain protected trees (7 sub areas) and ancient woodland (2 sub areas). All of the remaining sub areas contain less significant tree cover. This means that, overall, all of the sub areas within this Green Belt Area achieve moderate to high scores under this indicator.
- 7.4.6 The picture is more balanced in terms of Greenfield land, with a significant proportion of Green Belt sub areas containing some previously developed land.  
 The nine brownfield sites are in a variety of locations, with a variety of uses, including school buildings and grounds, housing, and a conference centre and grounds. Just under half of the sub areas in this Green Belt area are entirely greenfield.
- 7.4.7 The sub areas in Green Belt Area are of moderate agricultural quality.

### Purpose 3 - Green Belt Area B

- 7.4.8 Green Belt Area B achieves moderate to high scores in terms of countryside value. 17 out of 21 sub-areas achieve scores of between 11 and 18, with 7 sub areas scoring over 15 points out of a possible 20. Four sub areas achieve scores of 6 out of 20.

Criterion	Definition	Number of sub areas	Points
a) Nature conservation value	i. Yes – <i>statutory nature conservation designation</i>	1	5
	ii. Yes – <i>local nature conservation designation</i>	9	3
	iii. No specific nature designation	11	0
b) Trees and woodland	i. Yes – ancient or protected woodland, forests, trees or hedgerows	11	5
	ii. Yes – unprotected trees	10	3
	iii. No trees present	0	0
c) Greenfield land	i. Greenfield land	12	5
	ii. Predominantly Greenfield land (over 50%)	3	3
	iii. Previously developed land (brownfield)	6	0
c) Agriculture	i. Grade 1 or 2	4	5
	ii. Grade 3 or below	17	3
	iii. No agricultural use	0	0

Table 7.3.2 Green Belt Purpose 3 - Area B

- 7.4.9 Green Belt Area B is of considerable nature conservation value. One sub area (B1) contains an SAC (Wormley-Hoddesdonpark Woods) and SSSI (Wormley-Hoddesdonpark Wood North), as well as a number of wildlife sites. Nine further sub areas also contain local wildlife sites.
- 7.4.10 Just under half of sub areas in Green Belt Area B contain ancient woodland (two sub areas) or protected trees (nine sub areas), and over half of sub areas are entirely greenfield land, with a further three being predominantly greenfield land.
- 7.4.11 Six small sub-areas are predominantly previously developed land, a number of which are housing and gardens, along with some farm buildings and school buildings.
- 7.4.12 Most of Green Belt Area B is of moderate agricultural value, although four sub areas are of high value.
- 7.4.13 It should be noted that sub area B9, is by far the largest sub area in Green Belt Area B. Taking up almost half of the Green Belt Area, it performs a strong role for Green Belt Area B under Purpose 3 as:

- it contains a number of local wildlife sites;
- it contains ancient woodland (Spring Wood), along with a number of protected trees; and
- it is entirely greenfield and is of high agricultural value.

### Purpose 3 - Green Belt Area C

7.4.14 Sub Area C achieves moderate results in terms of nature conservation value, with 33 sub areas achieving scores between 5 and 15 out of a possible 20 (27 of which score below 10). 4 further sub-areas score between 16 points out of a possible 20.

Criterion	Definition	Number of sub areas	Points
a) Nature conservation value	i. Yes – <i>statutory nature conservation designation</i>	1	5
	ii. Yes – <i>local nature conservation designation</i>	5	3
	iii. No specific nature designation	31	0
b) Trees and woodland	i. Yes – ancient or protected woodland, forests, trees or hedgerows	9	5
	ii. Yes – unprotected trees	28	3
	iii. No trees present	0	0
c) Greenfield land	i. Greenfield land	8	5
	ii. Predominantly Greenfield land (over 50%)	13	3
	iii. Previously developed land (brownfield)	16	0
c) Agriculture	i. Grade 1 or 2	0	5
	ii. Grade 3 or below	37	3
	iii. No agricultural use	0	0

Table 7.3.3 Green Belt Purpose 3 - Area C

7.4.15 There is a slight locational division between high scoring and lower-scoring sub-areas, with the larger areas located away from the cluster of settlements around Goffs Oak (i.e. located to the north and west of the area) tending to achieve the higher scores. Three out of the four higher scoring sub-areas (C1, C3 and C31) are in these larger sub areas.

7.4.16 Sub area C1 contains an SAC (Wormley-Hoddesdonpark Woods) and SSSI (Wormley-Hoddesdonpark Wood North), and five further sub areas contain local wildlife sites. However, given that there are 37 sub areas in total it is considered that overall this Green Belt Area plays only a moderate role in relation to nature conservation.

7.4.17 All of the sub areas in Green Belt Area C contain trees, and nine sub areas contain significant tree cover, either in terms of ancient woodland (two sub areas) or protected trees (seven sub areas).

7.4.18 Most sub areas contain some previously developed land, with 16 being entirely brownfield. This reflects the location of this Green Belt Area, close to and in-between

a number of adjacent settlements. These predominantly previously developed sub areas include 7 nurseries, housing and gardens, and school buildings and grounds.

- 7.4.19 All of the land in Green Belt Area C is of moderate agricultural value.

### Purpose 3 - Green Belt Area D

- 7.4.20 Green Belt Area D again appears to be of moderate countryside value overall. 25 out of 27 sub area score between 5 and 15 out of a possible 20 points, although 13 of these score above 10 points. Two sub areas score 16 points. This overall average performance is reflected in the results below.

Criterion	Definition	Number of sub areas	Points
a) Nature conservation value	i. Yes – statutory nature conservation designation	0	5
	ii. Yes – local nature conservation designation	8	3
	iii. No specific nature designation	19	0
b) Trees and woodland	i. Yes – ancient or protected woodland, forests, trees or hedgerows	5	5
	ii. Yes – unprotected trees	22	3
	iii. No trees present	0	0
c) Greenfield land	i. Greenfield land	11	5
	ii. Predominantly Greenfield land (over 50%)	8	3
	iii. Previously developed land (brownfield)	8	0
c) Agriculture	i. Grade 1 or 2	5	5
	ii. Grade 3 or below	22	3
	iii. No agricultural use	0	0

Table 7.3.4 Green Belt Purpose 3 - Area D

- 7.4.21 The majority of sub areas are not protected nature conservation areas, although eight contain local wildlife sites. Six sub areas contain protected trees: the remaining sub areas do contain some (unprotected) tree cover.

- 7.4.22 There is a fairly even split between sites that are greenfield, predominantly greenfield, and brownfield. However, it should be noted that the four largest sub areas, which make up the majority of the land area in the Green Belt Area D, are greenfield. The brownfield sub-areas are comparatively small in size, and are occupied by school buildings and grounds, housing and gardens, and cemeteries.

- 7.4.23 The majority of sub areas are of moderate agricultural value, including the larger sub areas mentioned above. It should be noted that five sub areas to the very south east of Green Belt Area D are high grade land.

### Purpose 3 - Green Belt Area E

- 7.4.24 Green Belt Area E achieves a moderate score in relation to countryside value. Indeed, all but one sub area achieves a total score of between 5 and 15 out of 20,

with a further sub area scoring 16 points. 16 out of 28 sub areas achieve a score of below 10. The table below demonstrates that, overall, Green Belt Area E sub areas play a moderate role against Purpose 3.

<b>Criterion</b>	<b>Definition</b>	<b>Number of sub areas</b>	<b>Points</b>
a) Nature conservation value	i. Yes – statutory nature conservation designation	2	5
	ii. Yes – local nature conservation designation	8	3
	iii. No specific nature designation	18	0
b) Trees and woodland	i. Yes – ancient or protected woodland, forests, trees or hedgerows	2	5
	ii. Yes – unprotected trees	26	3
	iii. No trees present	0	0
c) Greenfield land	i. Greenfield land	12	5
	ii. Predominantly Greenfield land (over 50%)	10	3
	iii. Previously developed land (brownfield)	6	0
c) Agriculture	i. Grade 1 or 2	3	5
	ii. Grade 3 or below	13	3
	iii. No agricultural use	12	0

**Table 7.3.5 Green Belt Purpose 3 - Area E**

7.4.25 Green Belt Area E performs a significant countryside role in terms of nature conservation:

- Two sub areas contain highly significant protected conservation areas: E24 and E28 contain an SPA (Lee Valley) and a SSSI (Turnford & Cheshunt Pits). These sub areas represent two of the three larger sub areas in Green Belt Area E, and therefore represent a substantial proportion of the Green Belt Area as a whole.
- A further 8 sub areas contain local wildlife sites.

7.4.26 It should be noted that 18 sub areas have no nature conservation designations. However, these sub areas are the smallest in the Green Belt Area: the larger sub areas (the significant bulk of land cover in the area overall) contain protected land.

7.4.27 Just two sub areas contain protected trees, whilst the remaining 25 contain unprotected tree cover.

7.4.28 Most of the Green Belt area is greenfield land: whilst 12 out of 28 sub areas are entirely greenfield, a further 10 are predominantly so. 6 sub areas are predominantly brownfield, although it should be noted that all of these are comparatively small in size. These sub areas contain a weir and boat moorings, housing and gardens, a swimming pool and car park, a car park, and school buildings and grounds.

7.4.29 Most of the land in this Green Belt area is either of moderate agricultural use, or of no use. Three sites are of high agricultural value, although these are all relatively small in size.

### Purpose 3 - Overview of Results

#### The function of the Green Belt in Broxbourne against Green Belt Purpose 3

7.4.30 Overall, the Green Belt in Broxbourne appears to play a moderate role in terms of countryside value, although a number of sub areas do achieve high scores in relation to the specific areas assessed.

7.4.31 Specific issues to note include:

- A small number of international nature designations to the east and to the west of the Borough, with a broader spread of local wildlife sites in all Green Belt Areas. Green Belt Area B, to the west of the Borough, and E, to the east, perform particularly strongly in relation to nature conservation value;
- All sub areas across the Green Belt have some tree cover, although only a few contain protected trees and areas of ancient woodland;
- There is a predominance of greenfield land in the Green Belt. Some sub areas contain some brownfield land, and a number of sub areas are made up entirely of previously developed land, especially in the tight cluster of settlements in and around Green Belt Area C;
- The overwhelming majority of Green Belt sub areas are of moderate agricultural value, with two notable areas of high quality agricultural quality in Green Belt Areas B and D.

#### Sub Areas that do not perform a clear role under Purpose 2

7.4.32 There are a large number of sub areas that do not perform a clear role under Purpose 3 that are listed below:

- Green Belt Area A: A1, A3, A4, A11, A13, A16, A21, A24,
- Green Belt Area B: B13, B16, B17, B21
- Green Belt Area C: C2, C4, C6, C8C10, C124, C15, C16, C21, C22C24, C27, C29, C30, C32, C34,
- Green Belt Area D: D1, D5, D12, D13, , D22, D23, D25D28
- Green Belt Area E: E1E7, E8E10, E11, E13, E14, E15, E17, E21, E26, E27

## 7.5 Assessment of Individual Sub Areas

7.5.1 This section provides an overview of the overall performance of Green Belt sub areas against all the Green Belt purposes, and provides an initial indication of those areas that should be considered for removal from the Green Belt. Appended Map 4 shows the overall performance of all sub areas in Broxbourne Borough, showing those sub areas that are performing poorly and should be considered for release, which perform an average role, and which perform strongly. Appendix 2 contains a full assessment of the performance of each sub area.

### Strongly Performing Sub Areas

- 7.5.2 The majority of sub areas play a strong role (i.e. achieve the full points) for at least one of the Green Belt purposes. Appended Map 4 shows where these sub areas are located, and demonstrates that these areas follow particular trends.
- 7.5.3 Sub areas that are located away from the urban area tend to perform well against the Green Belt purposes because:
- They play a strong role in preventing urban sprawl, being located in open Green Belt where it is important that the Green Belt designations are retained;
  - Because of their location, they tend to be more likely to achieve high countryside value, being more likely to be greenfield, to contain protected sites and woodland.
- 7.5.4 Sub areas that are located close to the urban area, between two or more distinct settlements score highly overall due to their key role in preventing sprawl between settlements.

### Poorly Performing Sub Areas

- 7.5.5 Broxbourne's Green Belt is drawn tightly to the built-up area, and the Borough's Local Plan does not contain any designated safeguarded land. This restrictive scenario has resulted in incremental changes to the boundary by taking out individual sites from the Green Belt in successive plan periods as well as small-scale encroachment. This approach has in part undermined the degree of permanence and openness of the Green Belt.
- 7.5.6 The present state of the Green Belt boundary suggests that Broxbourne Borough Council, after looking at the potential of previously developed land first, would be left with little scope or flexibility to accommodate existing and future growth in the Borough. The research indicates that, due to past development trends, certain Green Belt land no longer serves Green Belt purposes, land is no longer open (i.e. surrounded by development on three sides) or perhaps include uses that should not have been included in the Green Belt in the first place and remain so for historic reasons.
- 7.5.7 Poorly performing sub areas tend to be located around the edge of the urban area, and are surrounded on three sides by existing built development. These sub areas do not play a strong role in preventing sprawl or separating existing settlements as,

in practice, they represent enclosed spaces that bear little relation to the open Green Belt or to distinct settlements.

- 7.5.8 Table 7.4.1 below shows those sub areas that are considered to perform poorly in that they do not achieve full points in any of the Green Belt purposes, except sub area E15 and achieve low scores overall.

**Table 7.4.1 Sub Areas that perform poorly against the Green Belt purposes**

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating Settlements			Purpose 3. Countryside			Total Score	Analysis
	Total	Total weighted	Comments	Total	Total weighted	Comments	Total	Total weighted	Comments		
A5 0	0	Separates two areas of land within the same large urban area (large urban area of Broxbourne and allocated site H3 to the north).	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 490 metres.	11	2.75	6.75	Performs strongly against Green Belt Purpose 2, although it should be noted that the dual carriageway provides a permanent barrier between these settlements. Performs poorly against Green Belt Purposes 1 and 3.		
A6 0	0	Separates two areas of land within the same large urban area (large urban area of Broxbourne and allocated site H3 to the north).	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 630 metres.	9	2.25	6.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Consider release from the Green Belt.		
A12 0	0	Separates two areas of land within the same large urban area.	3	3	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 1112 metres.	13	3.25	6.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of medium to high countryside value. Consider possible release from the Green Belt.		
A20 0	0	Separates two areas of land within the same large urban area.	1	1	Separates large urban area of Broxbourne and Hertford Heath by 3164 metres.	13	3.25	4.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl or separating distinct settlements. Of medium to high countryside value. Consider possible release from Green Belt.		

Purpose 1. Preventing Sprawl				Purpose 2. Separating Settlements				Purpose 3. Countryside				Analysis	
Sub Area	Total weighted	Comments	Total weighted	Comments	Total weighted	Total weighted	Total weighted	Total weighted	Total weighted	Total weighted	Total weighted	Total weighted	Total Score
A21	0	Separates two areas of land within the same large urban area.	1	1	Separates large urban area of Broxbourne and Hertford Heath by 3397 metres.	6	1.5	2.5	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl or separating distinct settlements. Of medium to low countryside value. Consider possible release from Green Belt.				
C32	0	Most of the sub area separates land within the same area- Goffs Oak, although some land is also outside of the outline of the urban area.	4	4	Separates Cuffley and Goffs Oak by 887 metres.	6	1.5	5.5	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Consider release from the Green Belt.				
C33	0	Separates land within the same area- Goffs Oak	4	4	Separates Cuffley and Goffs Oak by 972 metres.	9	2.25	6.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of medium countryside value. Consider possible release from Green Belt.				
D6	0	Separates two parts of the same urban area? Or separates the area north of Bury Green and Flamstead End?	4	4	Separates large urban area of Broxbourne and Burton Lane/Goffs Oak Area by 842 metres.	14	3.5	7.5	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of medium countryside value. Consider possible release from Green Belt.				

Purpose 1. Preventing Sprawl				Purpose 2. Separating Settlements				Purpose 3. Countryside				Analysis	
Sub Area	Total weighted	Comments	Total weighted	Comments	Total weighted	Total	Total weighted	Total	Total weighted	Total	Total weighted	Total Score	
D7	0	0	Separates two parts of the same urban area.	3	3	Separates large urban area of Broxbourne and Burton Lane/Goffs Oak Area by 1235 metres.	11	2.75	5.75	5.75	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, it could score lower than that attributed here. Of medium countryside value. Consider possible release from Green Belt.		
D8	0	0	Separates two parts of the same urban area.	3	3	Separates large urban area of Broxbourne and Burton Lane/Goffs Oak Area by 1251 metres.	9	2.25	5.25	5.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, it could score lower than that attributed here. Of medium countryside value. Consider possible release from Green Belt.		
D13	0	0	Separates two parts of the same urban area.	3	3	Separates large urban area of Broxbourne and Burton Lane/Goffs Oak Area by 1265 metres.	6	1.5	4.5	4.5	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of low countryside value. Consider possible release from Green Belt.		
E15	0	0	Separates two parts of the same urban area.	5	5	Separates large urban area of Broxbourne and Keyzers Estate by 433 metres.	8	2	7	7	Performs relatively poorly against Green Belt purposes 1 and 3. However, although it separates two parts of the same urban area, it also separates the large urban area of Broxbourne and Keyzers Estate, which are less than 500 metres apart. Consider for release, but carefully address its importance in terms of separating Broxbourne from Keyzers Estate.		

7.5.9 Additionally, the following sections of strongly performing sub areas could be considered for removal from the Green Belt, in order to improve the outline of the urban areas and avoid the inclusion of enclosed spaces within the Green Belt:

- B5: north east section branches off and separates two parts of the same urban area;
- C1: thin strip between Nightingale Road and Dahlia close separates two parts of the Hammond Street area
- C17, a small section to the east separates two parts of the same built up area west of Rosedale Way and north of St. Ann Close;
- C19: square area to the east separates two parts of the same built up area in the area west of Thompsons Close and north of Claremont;
- C20: square area to the east separates two parts of the same built up area in the area of Rosedale Sports Ground.

## 7.6 Green Belt Boundaries

7.6.1 The review of the Green Belt boundaries has kept in mind the main thrust of the advice in PPG2 (Jan 1995, amended March 2001):

- preventing urban sprawl by keeping land permanently open (paragraph 1.4);
- meeting defined Green Belt purposes (paragraph 1.5);
- confirming that Green Belts must be protected as far as can be seen ahead (paragraph 2.1);
- defining defensible boundaries that are not drawn excessively tight around existing built-up areas (paragraphs 2.8 & 2.9);
- safeguarding land for long-term needs (paragraph 2.12); and
- contribute to sustainable development objectives (paragraphs 2.10 & 2.12).

### Current strength of the Green Belt Boundary

7.6.2 This section assesses the strength of the inner Green Belt, the boundary between the Green Belt and urban land in Broxbourne. Appendix 4 provides a full summary of the inner Green Belt boundary for each relevant sub area, assessing the ability of specific areas of the relevant sub-area boundaries to provide a resilient, permanent barrier that would protect the Green Belt from encroachment over the long term. Appended Map 5 below shows those parts of the inner Green Belt boundary that are considered to be weak.

7.6.3 The strength of the Green Belt boundary in the inner Green Belt is variable. The A10 dual carriageway to the west of the large urban area of Broxbourne, and the rail line immediately east, provide very strong barriers to encroachment. There are also a number of areas where the boundary is marked by strong features such as distributor roads and thick tree lines.

7.6.4 However, a significant number of weak areas of the inner Green Belt boundary were found. This was especially the case where the Green Belt boundary ran along the rear gardens of homes or curtilages of existing buildings with no clear or permanent barrier between the two.

## 8 CONCLUSIONS AND RECOMMENDATIONS

### 8.1 Conclusions from the Review

- 8.1.1 This document has thus far set out how the Broxbourne Green Belt is performing against the purposes set out in PPG2 and allied to this, the strength of the inner Green Belt boundary, which is so crucial to the achievement of the long-term integrity of the Green Belt.
- 8.1.2 The research has found that the majority of Green Belt land in the Borough performs an important role in maintaining the openness of the Green Belt and preventing the coalescence of separate settlements. Although most Green Belt land is only of moderate value, a number of Green Belt sub areas, particularly to the west and east of the Borough, are of significant countryside value.
- 8.1.3 There are, however, a number of areas where the Green Belt is not performing a clear purpose. This is generally a result of piecemeal development that has not been subject to long term planning in relation to the integrity of the Green Belt. This has led to development that has crossed previously strong boundary lines and created Green Belt areas that are essentially enclosed spaces that do not perform a clear Green Belt purpose.
- 8.1.4 In order for the long-term integrity of the Green Belt to be achieved, it is crucial that all Green Belt land performs a clear purpose, and that it has an appropriate, defensible and robust inner boundary to safeguard the Broxbourne Green Belt from future unplanned encroachment. The research has found that the Broxbourne inner Green Belt boundary is weak in a number of locations.

### 8.2 Recommendations Changes to the Broxbourne's Inner Green Belt Boundary

- 8.2.1 This section now provides recommendations regarding possible boundary alterations, and the associated removal of sub areas, or parts of sub areas.
- 8.2.2 In a number of areas, it would not be appropriate to consider the release of land because of a weak boundary. For example, a number of sub areas provide the only barrier between an urban area and the open Green Belt, or another distinct settlement, with no opportunities to provide a stronger boundary further into the Green Belt. In these circumstances, it would be appropriate to leave the Green Belt boundary as it is and sub areas in their current form.

- 8.2.3 However, there are a number of sub areas where there are opportunities to significantly improve the permanence and robustness of the Green Belt boundary, and to facilitate the removal of poorly performing sections of Green Belt.
- 8.2.4 It is considered that there are two main options to ensure that the Green Belt of the future is appropriate, and that its boundary is robust over the long term.
- 8.2.5 **Option 1** involves small-scale adjustments to Green Belt sub areas to improve the robustness and defensibility of the Green Belt boundary in the short term, and also to enable the release of the poorly performing sub areas (see Table 6.4.1 above). This option entails the release of limited amounts of land from the Green Belt where there are discrete opportunities to improve boundary strength. This would restrict the ability to provide a fully permanent and robust boundary, but would avoid the release of large amounts of Green Belt land.
- 8.2.6 **Option 2** proposes a number of slightly more bold changes to the Green Belt, involving the additional release of larger areas of land in order to achieve a more strengthened boundary that would survive over the longer term. The Council could also consider larger-scale long-term areas of search that would lead to the removal of large areas of open Green Belt land, but facilitate the creation of a more permanent, robust inner Green Belt boundary that would be defensible over the long term.
- 8.2.7 The remainder of this section sets out the details of these proposed boundary alterations, and addresses the implications for the Green Belt. It also includes an assessment of constraints and development opportunities, which is intended to provide some indication of how land proposed for removal from the Green Belt could be dealt with in policy terms. Please see Appendix 6 for a full assessment of the constraints and development opportunities for each sub area considered for removal from the Green Belt.
- 8.2.8 It is important to note that the removal of land from the Green Belt does not necessarily mean that land should be released for development. Many of the sites proposed for removal from the Green Belt below are of significant environmental or community value. Although this in itself may not merit designation as *Green Belt* land (whose purposes have been assessed in this Review, and are defined in paragraph 1.5 of PPG2), it could well be that these areas are protected under other more relevant, targeted policies. The assessment of development constraints and opportunities that is provided in parallel with the proposed alterations set out in this section are used to indicate some possible policy approaches for the proposed areas to be removed from the Green Belt.

### Option 1. Discreet removal of pockets of Green Belt Land

8.2.9 The tables below set out a number of discreet changes to the Green Belt that would:

- strengthen the boundary in the short term, without reducing the ability of the Green Belt to perform the dedicated PPG2 Green Belt purposes (Table 8.2.1);
- enable the release of poorly performing sub areas, without harming the strength of the Green Belt boundary (Table 8.2.2); and
- provide limited opportunities to allocate sites removed from the Green Belt for development to meet current needs and to safeguard land to meet possible future development needs up to 2031 (see Paragraph 8.2.18).

8.2.10 Appended Map 7 shows the location of these proposed alterations.

8.2.11 Table 8.2.1 below sets out the details of the proposed Option 1 changes to the Green Belt boundary that arise from the assessment of the strengths and weaknesses of the inner Green Belt boundary. It sets out where the research has identified specific opportunities to strengthen the inner boundary, without wholesale removal of open Green Belt land, or otherwise harming the fundamental role of Green Belt sub areas in terms of their performance against the Green Belt purposes. Lastly, the table summarises the findings of an investigation of the constraints and sustainable development opportunities for each alteration, providing an indication of the possible policy approach to any land that is released from the Green Belt.

**Table 8.2.1 Boundary alterations to improve the defensibility of the Green Belt boundary (Option 1a)**

Sub area	Proposed alteration	Site area (ha)	Change number	Relationship with purposes and implications for Green Belt	Constraints and Sustainable Development Opportunities	Suggested Policy Approach
A2	Remove two protrusions on eastern boundary	0.71	1.1	Performs strongly against Green Belt purposes, chiefly due to its role in preventing coalescence of the large urban area of Broxbourne with Hertford Heath. Release of these two protrusions would not significantly harm this role as they are located away from this area.	Landscape character and archaeology could constrain built development. Consider protection under landscape designation.	Landscape/countryside/open space protection policy

Sub area	Proposed alteration	Site area (ha)	Change number	Relationship with purposes and implications for Green Belt	Constraints and Sustainable Development Opportunities	Suggested Policy Approach
A20	Remove sub areas 20 and 21	5.64	1.2	Performs poorly against the Green Belt purposes.	Site is highly accessible, in close proximity to local & district services but constrained by high flood risk, and contains community buildings and a number of trees- on this basis it may not be a priority for development. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Safeguard
A21	Remove sub areas 20 and 21	9.39	1.3	Perform poorly against the Green Belt purposes.	Site presents the highest level of opportunities across nearly all criteria, main constraint is flooding- potential for built development with flood mitigation policy measures.	Safeguard and introduce Schools policy.
B12	Remove a small strip of Green Belt and move north to stronger tree line	0.37	1.4	Performs strongly against Green Belt purposes, chiefly due to its role in preventing sprawl into the open Green Belt. Release of this very small section would not significantly harm this role.	Highly constrained site in terms of landscape quality and nature conservation. Release of this small section of the sub area would bring benefits in terms of a strengthened boundary with minimal loss of Green Belt land.	Landscape/ countryside/ open space protection policy

Sub area	Proposed alteration	Site area (ha)	Change number	Relationship with purposes and implications for Green Belt	Constraints and Sustainable Development Opportunities	Suggested Policy Approach
C1 (part)	Remove the thin strip from Green Belt between Nightingale Road and Dalia Close but keep protective environmental policy for common land. It is difficult to see how land surrounded by development keeps the openness of the Green Belt.	0.49	1.5	Although sub area C1 performs strongly against Green Belt purposes, this small section performs poorly as it separates two parts of the Hammond street area.	Poor accessibility and lack of regeneration potential mean that this site may not be a priority for development. Currently provides a green link from the built up area to the open Green Belt.	Landscape/countryside/open space protection policy
C20	Remove this triangle piece of land on north side of Andrew's Lane and consider if it could be put to any particular use	0.06	1.6	Performs strongly against Green Belt purposes, chiefly due to its role in preventing the coalescence of distinct existing settlements. This section of the sub area is located between two parts of the large urban area of Broxbourne, away from the other settlements, and its removal would therefore not endanger this role.	Free of constraints but poor sustainable development opportunities means that the site may not be a priority for development. However, it would provide the opportunity to create a more logical built boundary, and as a very small site, it may not be worth safeguarding.	Consider allocation for development
C25	Remove PH, move north to field boundary	0.17	1.7	Performs strongly against Green Belt purposes, chiefly due to its role in preventing the coalescence of distinct existing settlements. This section of the sub area is sufficiently small that its loss would not harm this role, and a stronger role would deliver a better barrier to coalescence.	The site has very few constraints but adjacent to an area of community open space value. It presents a number of opportunities including accessibility, proximity to neighbourhood centre and PDL.	Consider allocation (for areas not covered by open space designation)

Sub area	Proposed alteration	Site area (ha)	Change number	Relationship with purposes and implications for Green Belt	Constraints and Sustainable Development Opportunities	Suggested Policy Approach
C33	Consider removing from Green Belt, moving the boundary to established hedgerow/trees	1.01	1.8	Performs strongly against Green Belt purposes, chiefly due to its role in preventing the coalescence of distinct existing settlements. This section of the sub area is located between two parts of Goffs Oak, over 900m metres from Cuffley. Its removal would therefore not endanger this role.	Low constraints and strong performance against sustainability opportunities, though development is likely to be constrained by allotments use.	Landscape/countryside/open space protection policy
<b>Total Hectares available</b>	<b>17.84</b>					
Safeguard (of which 9.39 ha could then be covered by a new schools policy)	15.03					
Consider allocating	0.23					
Landscape/ environmental/ Community open space designation	2.58					

8.2.12 The discreet boundary alterations set out above would be likely to improve the performance of the Green Belt by strengthening the boundary, thus enabling it to be more defensible over the long term. The removal of these areas would include the loss of land of landscape character, and of community value in the form of an allotment. These characteristics are not material to the inclusion of land in the Green Belt (see PPG2 paragraph 1.7), but it is advised that appropriate planning policies are introduced to ensure that these areas are given the appropriate protection if removed. The removal of sub area A21 would lead to the removal of a school site from the Green Belt. Paragraph 8.2.21 below addresses the issue of schools removed from the Broxbourne Green Belt.

8.2.13 Aside from land that could be protected under appropriate environmental or community open space designations and a possible new schools policy, the Green Belt removals alterations set out above would enable the removal of 0.23 hectares of land that could be considered for development allocation, just under 6 hectares of land that could be safeguarded for possible allocation in the future (for example from 2021-2031), depending on the relevant development allocations, need, and urban capacity.

8.2.14 Table 8.2.2 below sets out a number of further alterations to the Green Belt boundary for the remaining poorly performing sub-areas, where there would be a neutral impact in terms of the Green Belt boundary, but would enable the removal of areas of Green Belt that do not successfully perform a function in terms of the Green Belt. This would mean that such areas would be more appropriately managed using alternative planning policy tools.

8.2.15 Two (relatively small) sites are considered to be appropriate for release for development, whilst it is suggested that a further sub-area is safeguarded for possible future development. Development of this site is not considered to be a priority given its constraints, and given that it is greenfield.

**Table 8.2.2 Boundary alterations to take account of poorly performing sub areas (Option 1b)**

Proposed alteration	Site area (ha)	Change number	Relationship with boundary	Constraints and Opportunities	Suggested policy approach
A5 A6	Removal of sub areas A5 and A6	2.06	1.9	Loss of sub areas A5 and A6 would have a neutral impact on strength of boundary as current strong boundary would be replaced by an equally strong boundary- woodland.	Landscape character and community open space could constrain built development along with lack of PDL. The site is not a priority for development, consider protection under landscape designation.

Proposed alteration	Site area (ha)	Change number	Relationship with boundary	Constraints and Opportunities	Suggested policy approach
A6 Removal or sub areas A5 and A6	1.53	1.10	Loss of sub areas A5 and A6 would have a neutral impact on strength of boundary as current strong boundary would be replaced by an equally strong boundary- woodland.	Site of an existing school in a highly accessible location, in close proximity to local & district services and presents very few constraints. Potential to enable appropriate development of the school, as required.	Safeguard and introduce Schools policy.
A12 Remove sub area.	2.76	1.11	As dense woodland, it forms a strong boundary and removal would therefore have a neutral impact on the inner Green Belt boundary.	No constraints though as woodland would not be appropriate for development. Consider protection under countryside policies.	Landscape/ countryside/ open space protection policy
C19 Remove rectangular area to the east where it separates two parts of the same urban area	2.26	1.12	Removal would have a neutral impact as the current weak boundary would be replaced by a tree-lined boundary- however this tree line would need to be strengthened to be considered a more robust barrier to encroachment.	The site has a high community open space value and presents few sustainable development opportunities. Consider protection under landscape designation.	Landscape/ countryside/ open space protection policy
C32 Remove sub area.	1.23	1.13	Neutral impact: current weak boundary would be replaced by an equally weak boundary- open field.	Relatively unconstrained and good accessibility. Potential to enable appropriate development of the school, as required.	Safeguard and introduce Schools policy.
D6 Consider removal of sub areas D6, D7 and D8 in conjunction as they all perform poorly against the Green Belt	13.77	1.14	Release of these sub area would lead to a much stronger boundary- Lieutenant Ellis Way.	Constrained by nature conservation. Protect using appropriate nature conservation and Schools policy.	Safeguard and introduce Schools policy.

Proposed alteration	Site area (ha)	Change number	Relationship with boundary	Constraints and Opportunities	Suggested policy approach
D7 purposes.	2.29	1.15		Lack of constraints and reasonable accessibility, though as greenfield and not derelict, it may not be a priority for development.	Safeguard and introduce a Schools policy.
D8	12.61	1.16		Community open space constraint means this site may not be a priority for development.	Safeguard and introduce a Schools policy.
D12 Remove D13 due to poor performance against purposes, and remove D12 to tie in with this release, and create a stronger Green Belt inner boundary using the tree line to the south of the sub area.	1.39	1.17	Performs strongly against the Green Belt purposes chiefly because it separates Broxbourne urban area from the open Green Belt. However, its current weak boundary would do little to prevent encroachment and removal would enable the creation of a more robust boundary to achieve this over the long term.	Landscape character, allotments use & lack of PDL (other than cemetery) are likely to restrict built development opportunities. Consider protection under allotments policy/landscape designation.	Landscape/ countryside/ open space protection policy
D13	5.82	1.18	Removal would have a positive impact as the current weak boundary would be replaced by a stronger treelined boundary.	Landscape character & lack of PDL (other than cemetery) could restrict built development opportunities. Consider protection under landscape designation. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Landscape/ countryside/ open space protection policy
E15 Remove sub area	4.40	1.19	Removal would have a neutral boundary impact, as the current strong boundary would be replaced by an equally strong boundary in the form of the distributor road to the east.	Open space designation and flood risk restrict built development opportunities. Protect using appropriate open space policies.	Landscape/ countryside/ open space protection policy

Proposed alteration	Site area (ha)	Change number	Relationship with boundary	Constraints and Opportunities	Suggested policy approach
<b>Total hectares available</b>	<b>50.12</b>				
Safeguard (with schools policy)	31.43				
Consider allocating	0				
Landscape/ environmental/ Community open space designation	18.69				

8.2.16 Green Belt land proposed for removal in the above table contains a number of characteristics that may merit protection, including landscape character, community open space designations, woodland, a cemetery and allotment use. It is important that these issues are addressed in the preparation of future planning policies in order to ensure that appropriate protection is afforded to areas of social and environmental importance. It is considered that policies on these issues would provide more appropriate protection to these areas than Green Belt status, given that they do not appear to perform strong Green Belt purposes. Three sub areas also contain schools, and thus 31 hectares of land could be safeguarded and addressed under a new schools policy. The issue of schools removed from the Green Belt is addressed separately in paragraph 8.2.21.

8.2.17 The assessment of constraints and sustainable development opportunities indicates that none of the sites proposed for release might be considered appropriate for release for development.

8.2.18 Option 1 Green Belt alterations would therefore facilitate the removal of approximately 68 hectares of Green Belt land, of which:

- Approximately 21 hectares could be protected under appropriate community open space, landscape, and other environmental policies;
- Just under 6 hectares could be safeguarded for possible future development (e.g. 2021-2031), depending on the relevant development needs and allocations, and urban capacity information;
- Approximately 41 hectares could be safeguarded and addressed under a new schools policy; and
- 0.23 hectares could be considered for allocation for development in the short term (e.g. current plan period to 2021).

### Poorly performing sub areas not considered to be appropriate for removal

8.2.19 The boundary review has found that the release of three sections of sub areas that performed poorly against the Green Belt purposes may be inadvisable because their release would create a weaker inner Green Belt boundary. This would have negative implications for the long-term defensibility of the Green Belt. Table 8.2.3 below sets out those poorly performing sections of sub areas, and why removal may not be appropriate.

**Table 8.2.3 Poorly performing sub areas not considered appropriate for removal**

	<b>Proposed alteration</b>	<b>Relationship with boundary</b>	<b>Recommendation</b>
B5 (part)	Remove enclosed space to the very north-east of the sub area.	Possible negative impact as a weak boundary would be replaced by an even weaker boundary in the form of a built up school area without options for a new, alternative boundary.	Release may be inadvisable due to boundary issues.
C17 (part)	Remove the enclosed section area to the very east of the sub area.	Negative impact as the current strong boundary (distributor road) would be replaced with an ill-defined tree line	Release may be inadvisable due to boundary issues.
C20 (eastern section)	Remove a square section to the very east where it separates two parts of the same urban area	Negative impact: current weak boundary would be replaced by an even weaker boundary- the middle of open field.	Release may be inadvisable due to boundary issues.

### Option 2 - Removal of larger areas of land

- 8.2.20 There are a number of areas where the removal of slightly larger areas of land that appear to perform a strong Green Belt role would provide opportunities to create a stronger, more defensible inner Green Belt boundary over the longer term. The proposed Option 2 alterations set out in Table 8.2.4 would enable the Council to take a slightly bolder, but more long-term view, allowing it to take into account the defensibility of the Green Belt boundary and the availability of land to support growth over the medium term. These alterations are shown in Appended Map 7.
- 8.2.21 The suggested alterations would need to be supported by the provision of appropriate planning policies to protect land of landscape, environmental or community importance. Although this option may be unlikely to provide sites that would be considered to be priorities for development, it does provide the opportunity to safeguard further land to meet development needs in the future, for example post-2031, if required (see Paragraph 8.2.24).

**Table 8.2.4 Option 2 alterations: Proposed changes to the Green Belt boundary strengthen the boundary and enable the release of larger areas of Green Belt land**

Sub area	Proposed alteration	Site area (ha)	Change number	Relationship with purposes and implications for Green Belt	Constraints and SD Opportunities	Suggested Policy Approach
A10	Remove sub areas A10, A11 and A13 (along with A12- see option 1 proposed changes above) in order to provide a stronger inner Green Belt boundary in the form of the A10 dual carriageway to the west of sub area A10, and the strong tree boundary to the south of sub area A13.	10.13	2.1	The sites achieve high scores against the Green Belt purposes due to their role as a barrier to the open Green Belt and in separating Broxbourne urban area from the settlement west of Hailey Farm. However, the potential for openness is reduced by the uses within the sub areas (including a reservoir and a school) and surrounding them (housing and the dual carriageway). It is therefore considered that removal of these sub areas would bring benefits in terms of a stronger boundary, that would play a more robust role in separating the urban area from the open Green Belt, and small settlements to the north west.	Landscape character could restrict built development opportunities. Consider protection under landscape designation.	Landscape/ countryside/ open space protection policy
A11		1.36	2.2		Landscape character could restrict built development opportunities. Consider protection under landscape designation.	Landscape/ countryside/ open space protection policy
A13		1.67	2.3		Landscape character could restrict built development opportunities. Consider protection under landscape designation, and flood risk policies.	Landscape/ countryside/ open space protection policy
A15	Remove eastern corner of sub area, to create a new, stronger boundary using a thick tree line.	1.86	2.4	The strong performance against the Green Belt purposes of the area chiefly relates to its role in separating the Broxbourne urban area from the open Green Belt. The current weak boundary to the east undermines this: a stronger boundary using the thick tree line would strengthen the role of this sub area in preventing sprawl over the longer term.	Although relatively unconstrained, its average performance against the sustainable development opportunities means that it is not a priority for development.	Safeguard.

Sub area	Proposed alteration	Site area (ha)	Change number	Relationship with purposes and implications for Green Belt	Constraints and SD Opportunities	Suggested Policy Approach
C31 (part)	Remove part of C31, C33 and C34 and move boundary to northern edge of woodland and field boundary to edge of woodland and field boundary.	2.23	2.5	Perform strongly against the Green Belt purposes chiefly because they help to separate Goffs Oak from Cuffley. However, removal of these sub areas would enable a more robust and defensible long-term boundary that would more effectively prevent encroachment westwards from Goffs Oak.	Lack of constraints and good accessibility means that this site would be worth allocating. However, given poor regeneration potential, this site may not be considered to be a priority for development.	Safeguard.
C33		1.01	2.6		Low constraints and strong performance against sustainability opportunities, though development is likely to be constrained by allotments use.	Landscape/ countryside/ open space protection policy
C34		0.93	2.7		Lack of constraints and good accessibility means that this site would be worth allocating. However, given poor regeneration potential, this site may not be considered to be a priority for development.	Safeguard.
D1	Remove to be consistent with other schools that have the potential to provide an equivalent or stronger boundary. Removal would enable a strong inner Green Belt boundary to be retained.	1.62	2.8	Performs strongly against the Green Belt purposes chiefly as it provides a barrier between Goffs Oak and the open Green Belt. Removal would not result in large-scale loss of Green Belt land, but would enable the school to be more flexible in terms of necessary future development.	Low constraints and reasonable sustainability opportunities mean that this site could be removed and protected under a Schools policy.	Safeguard and introduce Schools policy.

Sub area	Proposed alteration	Site area (ha)	Change number	Relationship with purposes and implications for Green Belt	Constraints and SD Opportunities	Suggested Policy Approach
D14	Remove D14 and introduce a stronger boundary to the west (Lieutenant Ellis Way)	10.93	2.9	Performs a strong role in separating the urban area of Broxbourne and the open Green Belt, and also partially in separating the urban area from other settlements to the west. However, a much strengthened boundary in the form of Lieutenant Ellis Way would provide a more robust and permanent barrier that would prevent further encroachment towards the west.	Landscape character and lack of PDL could restrict built development opportunities. Consider protection under landscape designation. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Landscape/ countryside/ open space protection policy
D15	Remove part of D15 from Green Bury Way and Waterside Green Chains as this is already allocated in the Local Plan as policy EMP11, move boundary to Lieutenant Ellis Way then keep EMP11 and protection of Broom Hills designations.	18.25	2.10	Performs a strong role in separating the urban area of Broxbourne and the open Green Belt, and also partially in separating the urban area from other settlements to the west. However, a much strengthened boundary in the form of Lieutenant Ellis Way would provide a more robust and permanent barrier that would prevent further encroachment towards the west.	Site is highly accessible & in close proximity to local & district services but constrained by high flood risk, archaeological interest, landscape character and nature conservation designation. Consider protection under landscape and nature conservation policies.	Landscape/ countryside/ open space protection policy
<b>Total hectares available</b>		<b>49.99</b>				
Safeguard (of which 1.62 ha could be then covered by a new schools policy)		6.64				
Consider allocating		0				
Landscape/ environmental/ Community open space designation		43.35				

8.2.22 The release of these sites would include the removal of areas of environmental and community significance that would, as with option 1 removals, require policy measures in future development plan documents to safeguard these areas using the appropriate policy tool. These include:

- areas of strong landscape character;
- allotments; and
- land designated as nature conservation areas.

8.2.23 Three sites (including one school site) could be safeguarded, as they are not overly constrained, but do not perform well in terms of sustainable development and/ or regeneration opportunities. Although these areas may not merit special policy protection, they may not be priorities for development, subject to relevant urban capacity information.

8.2.24 Therefore of approximately 50 hectares of Green Belt land that could be removed under Option 2:

- 5 hectares could be safeguarded for possible future development (for example post-2031), depending on the relevant development needs and allocations, and urban capacity information;
- Just under two hectares could be safeguarded and addressed under a new schools policy; and
- 43 hectares could be protected under appropriate community open space, landscape or other environmental policies.

8.2.25 The assessment of constraints and sustainable development opportunities indicates that, within the sub areas proposed for removal under option 2, there may not be any land that may be considered a priority for development allocation.

## School Sites

8.2.26 This section has proposed the removal of a number of school sites from the Green Belt, including those in sub areas A6, A21, C32, D6, D7 and D8. These school sites are located on the edge of the urban area, and tend to have weak inner boundaries that would do little to prevent sprawl over the longer term. Furthermore, it is not considered to be appropriate to locate such important community assets in the Green Belt (where it can be avoided) such that there are strong limitations on the ability of those sites to grow in the future. Table 8.2.4 above proposes that the school in sub area D1 is also removed from the Green Belt, in order to reflect this emphasis on the removal of schools from the Green Belt, where this would not threaten the performance of the Broxbourne Green Belt against the PPG2 purposes, or threaten the boundary strength of the inner Green Belt.

8.2.27 However, there are two sections of Green Belt that contain schools where removal from the Green Belt would be inadvisable. Sub areas A3 and A4 contain a school site, and could provide an equally strong inner boundary to the north and west. However, the Green Belt in this location plays a crucial role in separating the urban area of Broxbourne an adjacent community in Hertford Heath. It is therefore

considered that removal of these sub areas could be harmful to the performance of the Green Belt. Sub area E26 is also located on the edge of the urban area of Broxbourne. However, there are no further opportunities to provide a strong inner boundary before the open Green Belt. The removal of this sub area would therefore have negative implications in terms of the role of the Green Belt in separating urban areas from the open Green Belt, and protecting the countryside from encroachment.

## 8.3 Long Term Areas of Search

- 8.3.1 Section 8.2 above sets out suggested alterations to the Green Belt boundary in order to improve the function and defensibility of the Broxbourne Green Belt to serve the Borough over the short term (Option 1 alterations) to medium term (Option 2 alterations). The Council may wish to consider wider, long-term measures to substantially improve the permanence and robustness of the Green Belt in the Borough whilst ensuring an appropriate policy approach to any land removed from the Green Belt (including protection policies, where needed). These measures could also provide the opportunity for some of the land removed from the Green Belt to be allocated for development to generally meet development needs post 2031.
- 8.3.2 Based on the boundary assessment, the review has highlighted three broad long term *areas of search* that the Council could consider for removal, having regard to long term sustainability objectives, and maintaining the permanence of the Green Belt up to at least 2031 as advised by the draft East of England Plan Policy SS7 and beyond this period, reflecting the emphasis in PPG2 on the permanence of the Green Belt. This approach would leave significant untouched greenways on the outer edge of the built-up areas that separates Broxbourne from adjoining districts. It would, however, also lead to the removal of large areas of Green Belt land that could be considered to have some Green Belt purpose.
- 8.3.3 Appended Map 8 shows the location of these broad areas. Appendix 7 discusses the long term areas of search.

### A. HODDESDON AREA

- 8.3.4 Building on the proposed limited removal of specific sub areas in Green Belt Area A (see Section 8.2 above), the removal of sub-areas A14 - A22 would enable the creation of an extremely robust, permanent Green Belt inner boundary in the form of the A10 dual carriageway. Also there is a need to decide whether the A10 should be included or excluded from the Green Belt (i.e. included - western edge of A10 would form the new Green Belt boundary or excluded, so the eastern edge would form the boundary).
- 8.3.5 This would mean the additional loss of Green Belt sub area 14 to 19, and 22. Section 8.2 has also set out recommendations for the removal of sub areas A10 to A13 and A20 and A21. This would entail the removal of over 136 hectares of open Green Belt land. Given the nature of much of the land, it is strongly recommended that the removed Green Belt land should be re-designated as safeguarded or protected land.
- 8.3.6 The removal of these sub areas from the Green Belt would raise a number of issues regarding how the removed Green Belt land would be approached by future plans and policies. It is important that appropriate approach is taken with regard to the safeguarded and protection policies prior to consideration of future uses. For example, a number of the sub areas are of significant landscape quality: appropriate designations and supporting policies should be used to ensure that these sites are protected. Similarly, a number of sub areas are designated as community open

space, and as nature conservation areas (local wildlife sites). Appropriate policies could again be introduced to ensure that these sites are given adequate protection.

- 8.3.7 A number of areas are relatively unconstrained, and achieve moderate results in relation to opportunities for sustainable development. These areas may be taken forward, but further consideration would need to be given to accessibility, landscape value and the fact these areas are greenfield sites; factors that indicate that the land in this area of search may not be considered to be a priority for development.
- 8.3.8 Potential alterations to the Green Belt in the Hoddesdon area could enable:
- Approximately 79 hectares of land to be protected under appropriate community open space, landscape and other environmental policies; and
  - Approximately 58 hectares of land to be safeguarded for possible future development post 2031 unless a specific need is identified or the site would contribute to regeneration objectives.

## B. WORMLEY AREA

- 8.3.9 There is again the opportunity to provide a significantly more robust and permanent Green Belt inner boundary for Broxbourne in the form of the A10 dual carriageway through the removal of sub areas B4 to B8. These sub areas are relatively large, and green in nature, and their removal would involve the loss of a significant amount of open Green Belt, but would again help to form a significantly more permanent boundary and a more cohesive urban outline for the Borough.
- 8.3.10 These areas appear to have significant community and environmental value, with open space designations and strong landscape character that provide a degree of protection over the short, medium and long term. Therefore although this option would enable the removal of 81 hectares of Green Belt land, appropriate policies should be put in place to protect this land from development. This would mean that the land should be safeguarded along with any necessary protection planning policies. This approach would deal with the weak inner Green Belt boundaries and the A10 would provide a superior long term edge to the Green Belt as well as preventing further sprawl.

## C. HAMMOND STREET, GOFFS OAK AND ROSEDALE AREA (FARMS/FIELDS/NURSERIES SURROUNDING THE ST JAMES'S ROAD RESIDENTIAL AREA)

- 8.3.11 Appended Map 5 demonstrates that the majority of land between the large urban area of Broxbourne and the distinct existing settlements within the Borough to the west (i.e. land covered by Green Belt sub areas C11-C30) has extremely weak boundaries. This means there are no real barriers to prevent encroachment between settlements. Indeed, it is incremental development that has taken place apparently without regard to the integrity of the Green Belt that has led to the creation of these various settlements.

8.3.12 An option, therefore, is to transform the Green Belt in this location, in order to create a far stronger boundary around the edge, using existing distributor roads. The Council could therefore consider removing the following sub areas:

- part of C1 (both sides of C10 and adjoining the built-up residential area);
- C10 through to 29;
- part of C30 (nurseries only).

8.3.12 If this land is removed from the Green Belt, it is strongly recommended that much of the removed Green Belt land is re-designated under environmental protection policies and/or safeguarded land, unless it can be demonstrated that small pockets of land are needed for development within the plan period. As with all of potential allocations, land released for development must be subject to the Specific Site Allocation Development Plan Document statutory procedures, including a Sustainability Appraisal.

8.3.13 A number of sub areas have characteristics that should be addressed by wider planning policy if this area was to be removed from the Green Belt. There are a number sub areas contain designated community open space, areas of landscape character and local wildlife sites. Appropriate planning policies should be introduced to give these areas the appropriate protection.

8.3.14 Eight sub areas do not have characteristics that are likely to merit policy protection, but poor performance in terms of opportunities for sustainable development means that they may not be considered to be priorities for development. For example, a number of sub areas do not contain previously developed land, appear to have poor accessibility to services, or are located away from urban areas.

8.3.15 It is considered that land within six sub areas may be considered for release removal for built development, if this area was removed from the Green Belt. However, this would have to be considered in having regard to a long-term future strategy for this whole area, which currently suffers from poorly defined areas that, in places, merge in to each other as a result of previous urban sprawl.

8.3.16 It is therefore suggested that, of the 252 hectares of Green Belt land that would be removed from this option:

- 172 hectares could be safeguarded and protected under environmental or community open space protection policies;
- Approximately 27 hectares could be safeguarded for possible future development (for example from 2021-2031), depending on the relevant development needs and allocations, and urban capacity information; and
- 53 hectares could be considered for development.

## 8.4 Safeguarded and Protection Policies

8.4.1 As discussed above the areas of long term search, if removed from the Green Belt it is recommended that the majority of the land would be designated as safeguarded land. Part of the reason to safeguard the removed Green Belt land is to improve the urban fringes, create a robust boundary, and ensure in the future that the land is

properly planned in an integrated fashion to best mesh with the existing built-up areas. There is also an opportunity to use other environmental protection policies to encourage green infrastructure, greenways and better land management. Indeed, it is considered that this Review provides the opportunity for the Council to ensure better protection of some sites by providing policies that better suit their characteristics in terms of social and environmental significance, rather than Green Belt status, where sites no longer perform a clear Green Belt purpose.

## 8.5 Constraints and Opportunities

- 8.5.1 The constraints and opportunities assessment has informed the use to which land could possibly be put, including possible protection policies that could be put in place to ensure that land is safeguarded as appropriate. Appendix 5 provides a detailed analysis of constraints and opportunities by sub area and grouped by: Option 1 Alternatives, Poor Performing Sub Areas, Option 2 Alterations and Long Term Areas of Search. Three main points came out of this assessment:
- ensuring that appropriate policies are in place to protect community open space and allotments;
  - protecting areas of environmental value such as landscape character areas and local wildlife sites;
  - facilitating and controlling development in schools.
- 8.5.2 The constraints and opportunities assessment was mainly carried out through an examination of aerial photographs and the Local Plan Proposals Map to provide indicative information regarding possible future policy approaches to land that could be removed from the Green Belt, and the availability of potential development land in the Green Belt that could be needed to meet development needs. This is an area of work that needs more work in the future, which will happen in association with the sustainability appraisal of Development Planning Documents.
- 8.5.3 The recommendations in this review should be used in conjunction with other Local Development Framework evidence base documents and sustainability appraisals to inform and shape Broxbourne's planning strategy in relation to its Green Belt, and wider issues of growth and sustainable development.
- 8.5.4 In particular, the Council would need to use urban capacity and Strategic Housing Land Availability Assessment information, and data from other studies, in conjunction with the information and recommended options in this Green Belt Review, to determine the amount land that should be removed from the Green Belt to meet development needs in this plan period to 2021 as well as up to 2031 and beyond. The amount of land and locations of land removed from the Green Belt will also need to be informed by wider priorities within the Borough linked to sustainability such as reducing levels of deprivation and economic development.
- 8.5.5 An appropriate assessment of all development constraints including through a Sustainability Appraisal of development options and sites, will be required to fully address the suitability of potential development sites, including any Green Belt land discussed in this Review.

## GLOSSARY

### **Community Open Space**

Community Open Space includes the following types of uses: recreational facilities, school playing fields, Cheshunt Common, Lea Valley Country Park, village greens, parks and any other definable green open spaces.

### **Derelict (as defined by NLUD, 2003)**

Land so damaged by previous industrial or other development that it is incapable of beneficial use without treatment, where treatment includes any of the following: demolition, clearing of fixed structures or foundations and levelling. Also included are abandoned and unoccupied buildings in an advanced state of disrepair (i.e. with unsound roof(s)).

The definition excludes land damaged by:

- development which has been or is being restored for agriculture, forestry, woodland or other open countryside use.
- a previous development where the remains of any structure or activity have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings), and where there is a clear reason that could outweigh the re-use of the site - such as its contribution to nature conservation - or it has subsequently been put to an amenity use and cannot be regarded as requiring redevelopment

### **Existing distinct settlement**

A settlement that is physically separate from any other settlement and that contains five or more dwellings (e.g. Hammond Street area between Limes Nurseries and Darnicle Nurseries; St James's Road area between The Langdons and Pendine; Goffs Oak, Cuffley Hill area; and Holbrook area).

### **Greenfield land**

This means land that has not been previously-developed (i.e. where no built development has previously taken place). This includes areas such as parks and playing fields.

### **Landscape Character**

As defined in the Hertfordshire Landscape Character Assessments (Hertfordshire County Council)

### **Large built up area**

- Within Broxbourne, this refers to the large, physically linked linear urban area that spreads from the south east of the Borough northwards, and that also branches off in a linear manner westwards. It does not include any areas that are not physically linked to this larger urban area.

- Outside of the Borough, this refers to large urban area just outside the Borough's boundary, such as Cuffley, Hereford Heath, Stanstead St Margarets, Keysers Estate, Lower Nazeing, Waltham Abbey and Enfield

### **Local nature conservation designations**

This includes:

- Local wildlife sites
- Local nature reserves

### **National or international nature conservation designations**

This includes:

- Special Area of Conservation (SAC) at Broxbourne Woods,
- Special Protection Area (SAP at Turnford and Cheshunt Gravel Pits within the Lee Valley,
- Sites of Special Scientific Interest (SSSIs) marked on the Local Plan Proposals Map (2005)

### **Previously developed land (often referred to as brownfield land, as defined by NLD, 2003 and PPS3, CLG, Nov 2006)**

Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure. The definition covers the curtilage of the development. Previously developed land may occur in both built-up and rural settings. It includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made through development control procedures

The definition excludes:

- Land that is or has been occupied by agricultural or forestry buildings.
- Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures.
- Land in built-up areas such as parks, recreation grounds and allotments, which, although it may feature paths, pavilions and other buildings, have not been previously developed.
- Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings).
- There is no presumption that land that is previously-developed is necessarily suitable for housing development nor that the whole of the curtilage should be developed.

### **Regeneration**

There is no universally agreed definition of regeneration, so in terms of carrying out the opportunities assessment in the context of Broxbourne we generally assumed regeneration to describe a range of activities and policies, including: turning around run down places, preventing further decline of places deemed at risk of decay and improving overall quality of

life (e.g. improvements to provision of health, housing, education, community safety, leisure services, business support, transport and the physical environment).

#### Town

For the purposes of this study, a 'town' is defined as a 'distinct existing settlement'. This reflects the fact that, in Broxbourne, some small, distinct settlements exist that are currently not merged together, but with the loss of some areas of Green Belt land, could lose their separateness.

#### Vacant (as defined by NLUD, 2003)

Previously developed land which is now vacant and could be redeveloped without treatment, where treatment includes any of the following: demolition, clearing of fixed structures or foundations and levelling.

It includes vacant buildings that are structurally sound and in a reasonable state of repair (i.e. capable of being occupied in their present state) where re-letting for their former use is not expected or that have been declared redundant.

It excludes land previously used for mineral extraction or waste disposal which has been or is being restored for agriculture, forestry, woodland or other use.

## APPENDIX 1: FINAL METHODOLOGY AND CRITERIA



### BOROUGH OF BROXBOURNE

#### GREEN BELT REVIEW STAKEHOLDER QUESTIONNAIRE METHODOLOGY & CRITERIA



### Background

The draft East of England Regional Spatial Strategy - Secretary of State's Proposed Changes (June 2006) supports the retention of the Green Belt in this region, but recommends a local review of the Green Belt in Broxbourne to meet regional development needs in sustainable locations. The Borough of Broxbourne Core Strategy; Issues and Options (April 2007), outlined that the Council would commission an independent assessment of the constraints and opportunities of the Green Belt in order to provide more evidence on long-term options (see Theme 3: Green Belt and Countryside). Since the publication of the Issues and Options paper the Council has commissioned Scott Wilson to undertake an independent review of the Green Belt within the administrative boundary of the Borough of Broxbourne.

## **SECTION A: OVERVIEW OF METHODOLOGY**

This review includes all areas of Green Belt land in Broxbourne, and will be used to assess the contribution made by these areas in preventing urban sprawl.

### **The assessment of Green Belt land against PPG2 purposes**

The five purposes in PPG2 are:

- I. To check the unrestricted sprawl of large built-up areas;
- II. To prevent neighbouring towns from merging into one another;
- III. To assist in safeguarding the countryside from encroachment;
- IV. To preserve the setting and special character of historic towns; and
- V. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

All Green Belt land will be judged against three of the five purposes of the Green Belt as defined in PPG2 (see Section B IV & V for an explanation of why these two criteria will not be tested).

Points will be awarded for each purpose against specific criteria (see Section B), in order to assess the contribution of each Green Belt area in a consistent manner. Those areas that are found to be weak in meeting Green Belt purposes will then undergo an additional assessment of development constraints and sustainable development opportunities (see Section C). This will help to inform the Local Development Framework process in terms of the future protection or release of Green Belt land.

### **Dividing Green Belt Land into Zones and Sub Areas**

The Green Belt land has been divided into zones and sub areas to make the review more manageable and to ensure that all land is assessed in a fair and transparent manner. This will also enable the review to make a recommendation on each sub-area. The criteria used to divide Green Belt land adheres to criteria that ensure parcels of land respect clear geographical boundaries, such as major development boundaries, distinct land uses, major roads and railway lines.

### **Green Belt Boundaries**

PPG2 advises that Green Belt boundaries should be clear and based on strong physical features. The existing Green Belt boundary should be assessed to identify all possible physical and visual boundary types.

In analysing Green Belt boundaries, the boundaries of each Green Belt zone will be categorised into 'strong' and 'weak', depending on the permanence and resilience of the boundary. This will inform potential alterations to the Green Belt boundaries that would make them defensible over the longer term.

## SECTION B: Green Belt Purpose - criteria & points

It is proposed that the following criteria will be used to assess Green Belt land against four of the five purposes set out in PPG2. This is to ensure that all Green Belt land is assessed in a fair and transparent manner. All words in italic are defined in the Glossary.

Please fill in the box under each of the five Green Belt purposes.

### I. Check the unrestricted sprawl of large built-up areas

Criterion	Definition	Points
Role of Green Belt area in preventing sprawl from taking place	Provides a barrier between an existing <i>large urban area</i> and open green belt; OR Is surrounded by Green Belt land on all sides; OR Provides a barrier between two or more <i>distinct existing settlements</i> ; OR Provides a barrier between two or more parts of the same large urban area.	5 5 5 0

**Purpose of Criterion:** this criterion gives points to those areas of Green Belt that stop development from taking place in a direction that would represent sprawl into open Green Belt, or between *existing distinct settlements* (see definitions) that would lead to the unrestricted loss of Green Belt land, or the agglomeration of built settlements. These scenarios reflect the Broxbourne context and help to establish where Green Belt land helps to check unrestricted sprawling development by keeping land permanently open.

### II. Prevent neighbouring towns from merging into one another

Criterion	Definition	Points
Shortest distance between the two (or more) <i>distinct existing settlements</i> (both within or outside the Borough) that the Green Belt area separates	i. 0 – 0.5 km ii. 0.5 – 1 km iii. 1 – 1.5 km iv. 1.5 – 2 km v. > 2 km	5 4 3 2 1

**Purpose of Criterion:** This criterion gives the most points to those areas of Green Belt land that provide a crucial buffer between *distinct existing settlements* (see definitions). This reflects the value of Green Belt land in preventing separate settlements from merging.

### **III. Assist in safeguarding the countryside from encroachment**

<b>Criterion</b>	<b>Definition</b>	<b>Points</b>
a) Nature conservation value	i. Yes – <i>statutory nature conservation designation</i> ii. Yes – <i>local nature conservation designation</i> iii. No specific nature designation	5 3 0
b) Trees	i. Yes – ancient or protected woodland, forests or trees ii. Yes – unprotected trees iii. No trees present	5 3 0
c) <i>Greenfield land</i>	i. Greenfield land ii. Predominantly Greenfield land (over 50%) iii. <i>Previously developed land (brownfield)</i>	5 3 0
c) Agriculture	i. Grade 1 or 2 ii. Grade 3 or below iii. No agricultural use	5 3 0

**Purpose of Criterion:** This criterion gives the most points to those areas that perform clear countryside purposes. This reflects the key importance of Green Belt designations in preventing encroachment on land of countryside value, whilst enabling further scrutiny of those areas of land that are not of clear countryside value.

### **IV. Preserve the setting and special character of historic towns**

#### **Criterion Deleted**

This criterion has been deleted because Broxbourne is not a historic town and therefore this PPG2 criterion does not apply to Broxbourne.

It was decided to leave this criterion in the consultation questionnaire in order to gauge public opinion. A number of consultation responses confirmed that this purpose does not apply to the context of Broxbourne.

It is recognised that the Borough does contain a number of conservation areas, some of which are adjacent to the Green Belt. These will be assessed as part of the development constraints of land in sub-areas that performs poorly against the Green Belt purposes.

### **V. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

All land within the Green Belt assists with this purpose, as the vast majority of built development is to be located in the urban area in accordance with site allocations. There is also a general presumption against inappropriate development within the Green Belt. Therefore all Green Belt land would gain the same score, so it is unnecessary to score land against this purpose. However after all Green Belt land is scored, then areas that have a low score will then be assessed against environmental constraints and opportunities that will include derelict land, and the lands potential to assist in urban regeneration.

## **SECTION C: CONSTRAINTS AND OPPORTUNITIES OF GREEN BELT AREAS THAT PERFORM POORLY AGAINST PURPOSES OF GREEN BELT - CRITERIA AND POINTS**

It is proposed that the following criteria will be used to assess the development potential of those sub-areas that do not perform well against the four Green Belt purposes used in this study. These criteria address factors that could constrain development potential as well as show the potential to accommodate sustainable new development sites.

Please note that this is a general review of constraints and opportunities to inform this Green Belt review. Any potential site options being considered in relation to the Site Allocations Development Plan Document would require a full public consultation and Sustainability Appraisal, in accordance with the advice set out in PPS12.

### **Constraints**

These are based on the constraints indicated in the Broxbourne Local Plan Second Review (December 2005) proposals map. They set out some factors that are present in Broxbourne, and that may obstruct the delivery of built development on a site. For example, the level of flood risk may restrict the ability to locate sensitive uses, such as housing, in some areas. Designations that are that have an inherent local or wider significance, such as archaeological, community or nature conservation designations may also be a barrier to development.

<b>Constraint</b>	<b>Definition</b>	<b>Points</b>
1. Flooding	i. Within Environment Agency Flood Zone 3 ii. Within Environment Agency Flood Zone 2 iii. Within Environment Agency Flood Zone 1	5 2 0
2. Archaeology/ Scheduled Ancient Monument (SAM)	i. Within area of archaeological interest/contains SAM/ contains listed building ii. Within >0.5km of an area of archaeological interest/SAM/conservation area/listed building iii. Not within <0.5km of an area of archaeological interest/ SAMs/conservation area/listed building	5 2 0
3. Community open space	i. Contains current designated open space: >1hectare ii. Contains current designated open space: <1hectare iii. Contains no designation	5 3 0
4. Landscape character	i. Good (condition)/ Strong (robustness) ii. Moderate/ Good or Moderate/ Strong iii. Moderate (condition)/ Moderate (robustness) iv. Moderate/ Poor or Moderate/ Weak v. Poor (condition)/ Weak (robustness)	5 4 3 1 0
5. Nature designations	i. International/ National nature conservation designation ii. Local nature conservation designation iii. No nature conservation designations	5 3 0

## Sustainable Development Opportunities

These opportunities are based on the principles set out in PPS1 *Delivering Sustainable Development*. PPS1 states that development plans should focus development in existing centres and near to major public transport interchanges in order to secure sustainable patterns of development.

PPS1 also promotes regeneration and the protection of the countryside. Where (a) a Green Belt boundary could be realigned to be more defensible and resilient over the longer term, and (b) the surplus area contains specific opportunities to contribute towards regeneration in the Borough. In these cases development may contribute towards the principles of sustainable development set out in PPS1.

Opportunity	Definition	Points
1. Public transport access	1a. Sub-area proximity to an existing bus service: <400 metres <800 metres >800 metres	5 3 0
	1b. Sub-area proximity to a train station: <800m <1.5km >1.5km	5 3 1
2. Distance to shops, schools, services and medical and other daily facilities	2a. Sub-area proximity to town centre/ district centre: <800m <1.5km <3km	5 3 1
	2b. Sub-area proximity to neighbourhood centre: <400m <800m >800m	5 3 0
3. Brownfield land and regeneration	3a. Does the sub-area contain previously developed land? Yes - >1 hectare Yes - <1 hectare No - none	5 3 0
	3b. Are there sites within the sub-area that are derelict or vacant? Yes - >1 hectare Yes - <1 hectare No - none	5 3 0
4. Strengthen the Green Belt boundary and regeneration	4a. Would the realignment of the Green Belt boundary create a more defensible boundary?	Y= 5 N= 0
	4b. If the answer to 4a is yes, could the resultant area contribute toward regeneration of the Borough that can not be met on other urban land?	Y= 5 N= 0

# GLOSSARY

## **Community Open Space**

Community Open Space includes the following types of uses: recreational facilities, school playing fields, Cheshunt Common, Lea Valley Country Park, village greens, parks and any other definable green open spaces.

## **Derelict (as defined by NLUD, 2003)**

Land so damaged by previous industrial or other development that it is incapable of beneficial use without treatment, where treatment includes any of the following: demolition, clearing of fixed structures or foundations and levelling. Also included are abandoned and unoccupied buildings in an advanced state of disrepair (i.e. with unsound roof(s)).

The definition excludes land damaged by:

- development which has been or is being restored for agriculture, forestry, woodland or other open countryside use.
- a previous development where the remains of any structure or activity have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings), and where there is a clear reason that could outweigh the re-use of the site - such as its contribution to nature conservation - or it has subsequently been put to an amenity use and cannot be regarded as requiring redevelopment

## **Existing distinct settlement**

A settlement that is physically separate from any other settlement and that contains five or more dwellings (e.g. Hammond Street area between Limes Nurseries and Darnicle Nurseries; St James's Road area between The Langdons and Pendine; Goffs Oak, Cuffley Hill area; and Holbrook area).

## **Greenfield land**

This means land that has not been previously-developed (i.e. where no built development has previously taken place). This includes areas such as parks and playing fields.

## **Landscape Character**

As defined in the Hertfordshire Landscape Character Assessments (Hertfordshire County Council)

## **Large built up area**

- Within Broxbourne, this refers to the large, physically linked linear urban area that spreads from the south east of the Borough northwards, and that also branches off in a linear manner westwards. It does not include any areas that are not physically linked to this larger urban area.
- Outside of the Borough, this refers to large urban area just outside the Borough's boundary, such as Cuffley, Welwyn Hatfield and Hertford Road area, Enfield, Honey Lane area, Waltham Abbey

## **Local nature conservation designations**

This includes:

- Local wildlife sites
- Local nature reserves

## **National or international nature conservation designations**

This includes:

- Special Area of Conservation (SAC) at Broxbourne Woods,
- Special Protection Area (SAP at Turnford and Cheshunt Gravel Pits within the Lee Valley,
- Sites of Special Scientific Interest (SSSIs) marked on the Local Plan Proposals Map (2005)

## **Previously developed land (often referred to as brownfield land, as defined by NLUD, 2003 and PPS3, CLG, Nov 2006)**

Previously developed land is that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings), and associated fixed surface infrastructure. The definition covers the curtilage of the development. Previously developed land may occur in both built-up and rural settings. It includes defence buildings and land used for mineral extraction and waste disposal where provision for restoration has not been made through development control procedures

The definition excludes:

- Land that is or has been occupied by agricultural or forestry buildings.
- Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures.
- Land in built-up areas such as parks, recreation grounds and allotments, which, although it may feature paths, pavilions and other buildings, have not been previously developed.
- Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings).

There is no presumption that land that is previously-developed is necessarily suitable for housing development nor that the whole of the curtilage should be developed.

## **Town**

For the purposes of this study, a ‘town’ is defined as a ‘distinct existing settlement’. This reflects the fact that, in Broxbourne, some small, distinct settlements exist that are currently not merged together, but with the loss of some areas of Green Belt land, could lose their separateness.

## **Vacant (as defined by NLUD, 2003)**

Previously developed land which is now vacant and could be redeveloped without treatment, where treatment includes any of the following: demolition, clearing of fixed structures or foundations and levelling.

It includes vacant buildings that are structurally sound and in a reasonable state of repair (i.e. capable of being occupied in their present state) where re-letting for their former use is not expected or that have been declared redundant.

It excludes land previously used for mineral extraction or waste disposal which has been or is being restored for agriculture, forestry, woodland or other use.

## Appendix 2: Results and analysis by sub-area

Sub Area	Purpose 1. Preventing Sprawl		Purpose 2. Separating			Purpose 3.		Total Score	Analysis
	Total weight ed	Total Comments	Total weight ed	Total Comments	Total weighted	Total weighted	Total weighted		
A1	5	5	Surrounded on all sides by Green Belt land	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 626 metres.	6	1.5	10.5
A2	5	5	Contributes to the separation of the large urban area of Broxbourne from the existing settlement of Hertford Heath.	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 579 metres.	9	2.25	11.25
A3	5	5	Contributes to the separation of the large urban area of Broxbourne from the existing settlement of Hertford Heath.	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 579 metres.	6	1.5	10.5
A4	5	5	Contributes to the separation of the large urban area of Broxbourne from the existing settlements of Hertford Heath.	5	5	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 680 metres.	6	1.5	11.5

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total	Total weighted	Comments	Total	Total weighted	Comments	Total	Total weighted	Total Score	
A5	0	0	Separates two areas of land within the same large urban area (large urban area of Broxbourne and allocated site H3 to the north).	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 490 metres.	11	2.75	6.75	Performs strongly against Green Belt purpose 2, although it should be noted that the motorway provides a permanent barrier between these settlements. Performs poorly against Green Belt purposes 1 and 3, its location meaning that it does little in terms of preventing sprawl. Of medium to high countryside value. Consider possible release.
A6	0	0	Separates two areas of land within the same large urban area (large urban area of Broxbourne and allocated site H3 to the north).	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 630 metres.	9	2.25	6.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Consider revising boundary as some land is outside of the outline of the urban area. Of medium to high countryside value. Consider possible release.
A7	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Hertford Heath by 2003 metres.	9	2.25	8.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
A8	5	5	Surrounded on all sides by Green Belt land	2	2	Separates large urban area of Broxbourne and Hertford Heath by 1624 metres.	11	2.75	9.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs relatively poorly against Green Belt Purposes 2.
A9	5	5	Surrounded on all sides by Green Belt land	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 990 metres.	11	2.75	11.75	Performs strongly against Green Belt purposes 1 and 2 and therefore merits retention. Also performs reasonably against Green Belt Purpose 3.
A10	5	5	Provides a barrier between an existing large urban area and open green belt	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 930 metres.	13	3.25	12.25	Performs strongly against each of the Green Belt purposes and therefore merits retention.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weight ed	Total weight ed	Comments	Total	Total weighted	Total	Total weighted	
A11	5	Provides a barrier between an existing <i>large urban area</i> and open green belt	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 930 metres.	8	2	11		Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs relatively poorly against Green Belt Purposes 2 and 3.
A12	0	0	Separates two areas of land within the same large urban area.	3	3	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 1112 metres.	13	3.25	6.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of medium to high countryside value. Consider possible release from Green Belt.
A13	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt	4	4	Separates large urban area of Broxbourne and small settlement West of Hailey Farm by 990 metres.	6	1.5	10.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
A14	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt	2	2	Separates large urban area of Broxbourne and Hertford Heath by 1700 metres.	11	2.75	9.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs relatively poorly against Green Belt Purposes 2.
A15	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt	1	1	Separates large urban area of Broxbourne and Hertford Heath by 2320 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
A16	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Hertford Heath by 3002 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
A17	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt.	1	1	Separates large urban area of Broxbourne and Hertford Heath by 2975 metres.	13	3.25	9.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Performs very poorly against Green Belt Purposes 2.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weighted	Total weight ed	Comments	Total	Total weighted	Total	Total weighted	
A18	5	5	Provides a barrier between an existing large urban area and open green belt.	1	1	Separates large urban area of Broxbourne and Hertford Heath by 3127 metres.	11	2.75	8.75	Performs a strong role under Green Belt purpose 1. Of medium countryside value.
A19	5	5	Provides a barrier between an existing large urban area and open green belt.	1	1	Separates large urban area of Broxbourne and Hertford Heath by 2840 metres.	9	2.25	8.25	Performs a strong role under Green Belt purpose 1. Of medium to low countryside value.
A20	0	0	Separates two areas of land within the same large urban area.	1	1	Separates large urban area of Broxbourne and Hertford Heath by 3164 metres.	13	3.25	4.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl or separating distinct settlements. Of medium to high countryside value. Consider possible release from Green Belt.
A21	0	0	Separates two areas of land within the same large urban area.	1	1	Separates large urban area of Broxbourne and Hertford Heath by 3397 metres.	6	1.5	2.5	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl or separating distinct settlements. Of medium to low countryside value. Consider possible release from Green Belt.
A22	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Hertford Heath by 3009 metres.	11	2.75	8.75	Performs a strong role under Green Belt purpose 1. Of medium countryside value.
A23	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Hertford Heath by 3028 metres.	18	4.5	10.5	Performs a strong role under Green Belt Purposes 1 and 3, and thus strongly merits retention. Achieves a low score against Green Belt Purpose 2.
A24	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Hertford by 4526 metres.	8	2	8	Performs a strong role under Green Belt Purpose 1 and 3, and thus strongly merits retention. Performs poorly against Green Belt Purposes 2 and 3.
A25	5	5	Surrounded on all sides by Green Belt land	2	2	Separates large urban area of Broxbourne and Hertford Heath by 1857 metres.	16	4	11	Performs a strong role under Green Belt Purposes 1 and 3, and thus strongly merits retention. Achieves a medium to low score against Green Belt Purpose 2.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weighted	Total	Total Comments	Total weighted	Total	Total weighted	Total Score	
A26	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Hertford Heath by 2544 metres.	12	3	9	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B1	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 3321 metres.	18	4.5	10.5	Performs a strong role under Green Belt Purposes 1 and 3, and thus strongly merits retention.. Achieves a low score against Green Belt Purpose 2.
B2	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 3583 metres.	14	3.5	9.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B3	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 3583 metres.	14	3.5	9.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B4	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 3787 metres.	14	3.5	9.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B5	5	5	Provides a barrier between an existing large urban area and open green belt. A small portion of the site contributes to the separation of two parts of the same urban area.	1	1	Separates large urban area of Broxbourne and Brickendon by 4444 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2. Consider revising boundary in relation to the small part of the site that separates two parts of the same urban area.
B6	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 4546 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B7	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 4546 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weighted	Total weight ed	Comments	Total	Total weighted	Total	Total weighted	
B8	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 4767 metres.	18	4.5	10.5	Performs a strong role under Green Belt Purposes 1 and 3, and thus strongly merits retention. Achieves a low score against Green Belt Purpose 2.
B9	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 4787 metres.	18	4.5	10.5	Performs a strong role under Green Belt Purposes 1 and 3, and thus strongly merits retention.. Achieves a low score against Green Belt Purpose 2.
B10	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 4926 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B11	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 5220 metres.	13	3.25	9.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B12	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 5083 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B13	5	5	Provides a barrier between an existing large urban area and open green belt .	1	1	Separates large urban area of Broxbourne and Brickendon by 4844 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
B14	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Brickendon by 4554 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B15	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Brickendon by 4562 metres.	16	4	10	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs very well against Green Belt Purpose 3. Performs poorly against Green Belt Purpose 2.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weighted	Total weight ed	Comments	Total	Total weighted	Total	Total weighted	
B16	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Brickendon by 4642 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
B17	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Brickendon by 4603 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
B18	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Brickendon by 4744 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B19	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Brickendon by 4342 metres.	18	4.5	10.5	Performs a strong role under Green Belt Purposes 1 and 3, and thus strongly merits retention. Achieves a low score against Green Belt Purpose 2.
B20	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Brickendon by 4303 metres.	13	3.25	9.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
B21	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Brickendon by 4331 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
C1	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt. Note that a thin strip separates two parts of the same urban area- the Hammond Street area.	5	5	Separates large urban area of Broxbourne and Hammond Street Area by 4611 metres.	16	4	14	Performs strongly against the Green Belt purposes, and thus should be retained. A discreet release of a small part of the sub area that separates two parts of the existing urban area may be appropriate.
C2	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Brickendon by 3665 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weighted	Total	Total Comments	Total weighted	Total	Total weighted	Total Score	
C3	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt.	1	1	Separates large urban area of Broxbourne and Brickendon by 3583 metres.	16	4	10	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs very well against Green Belt Purpose 3. Performs poorly against Green Belt Purpose 2.
C4	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt.	1	1	Separates large urban area of Broxbourne and Brickendon by 4068 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
C5	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt.	1	1	Separates large urban area of Broxbourne and Brickendon by 4068 metres.	9	2.25	8.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
C6	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt.	1	1	Separates large urban area of Broxbourne and Brickendon by 3985 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
C7	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt.	1	1	Separates large urban area of Broxbourne and Brickendon by 3958 metres.	9	2.25	7.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
C8	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt.	1	1	Separates large urban area of Broxbourne and Brickendon by 3847 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
C9	5	5	Provides a barrier between an existing <i>large urban area</i> and open green belt.	1	1	Separates large urban area of Broxbourne and Brickendon by 3700 metres.	11	2.75	8.75	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
C10	5	5	Contributes to the separation of the large urban area of Broxbourne the Hammond Street area.	5	5	Separates large urban area of Broxbourne and Hammond Street Area by 491 metres.	11	2.75	12.75	Performs strongly against Green Belt purposes.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weighted	Total	Total weight ed	Comments	Total	Total weighted	Total Score	
C11	5	5	Separates the large urban area of Broxbourne, the Hammond Street area and Goffs Oak.	5	5	Separates large urban area of Broxbourne and Hammond Street Area by 360 metres.	16	4	14	Performs strongly against Green Belt purposes.
C12	5	5	Separates the large urban area of Broxbourne and Goffs Oak.	4	4	Separates large urban area of Broxbourne and St James' Road Area by 677 metres.	9	2.25	11.25	Performs strongly against Green Belt purposes 1 and 2, and averagely against Purpose 3.
C13	5	5	Separates the large urban area of Broxbourne from the St. James Road area and Goffs Oak	5	5	Separates large urban area of Broxbourne and St James' Road Area by 262 metres.	12	3	13	Performs strongly against Green Belt purposes 1 and 2, and averagely against Purpose 3.
C14	5	5	Contributes to the separation of the large urban area of Broxbourne and the St James Road area.	5	5	Separates large urban area of Broxbourne and St James' Road Area by 294 metres.	6	1.5	11.5	Performs strongly against Green Belt purposes 1 and 2, and poorly against Purpose 3.
C15	5	5	Contributes to the separation of the large urban area of Broxbourne and the St James Road area.	5	5	Separates large urban area of Broxbourne and St James' Road Area by 406 metres.	8	2	12	Performs strongly against Green Belt purposes 1 and 2, and poorly against Purpose 3.
C16	5	5	Contributes to the separation of the large urban area of Broxbourne and the St James Road area.	5	5	Separates large urban area of Broxbourne and St James' Road Area by 488 metres.	6	1.5	11.5	Performs strongly against Green Belt purposes 1 and 2, and poorly against Purpose 3.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total	Total weighted	Comments	Total	Total weighted	Comments	Total	Total weighted	Total	
C17	5	5	Separates of the large urban area of Broxbourne and the St James Road area. A small area separates two parts of the same built up area west of Rosedale Way and north of St. Ann Close.	5	5	Separates large urban area of Broxbourne and St James' Road Area by 439 metres.	13	3.25	13.25	Performs strongly against the Green Belt purposes, and thus should be retained. A discreet release of a small part of the sub area that separates two parts of the existing urban area may be appropriate.
C18	5	5	Contributes to the separation of the large urban area of Broxbourne and the St James Road area.	4	4	Separates large urban area of Broxbourne and St James' Road Area by 654 metres.	9	2.25	12.25	Performs strongly against Green Belt purposes 1 and 2, and averagely against Purpose 3.
C19	5	5	Separates the large urban area of Broxbourne from the St James Road area and from the Burton Lane/ Goffs Lane area. A square area to the east separates two parts of the same built up area in the area west of Thompsons Close and north of Claremont	5	5	Separates large urban area of Broxbourne and St James' Road Area by 448 metres.	16	4	14	Performs strongly against the Green Belt purposes, and thus should be retained. A discreet release of a small part of the sub area that separates two parts of the existing urban area may be appropriate.
C20	5	5	Contributes to the separation of the large urban area of Broxbourne and the St James Road area. A square area to the east separates two parts of the same built up area in the area of Rosedale Sports Ground.	4	4	Separates large urban area of Broxbourne and St James' Road Area by 738 metres.	9	2.25	11.25	Performs strongly against the Green Belt purposes, and thus should be retained. A discreet release of a small part of the sub area that separates two parts of the existing urban area may be appropriate.
C21	5	5	Contributes to the separation of the St James Road area and the Burton Lane/ Goffs Lane area. Also contributes to the separation of the Burton Lane/ Goffs Lane area and the large urban area of Broxbourne	5	5	Separates Burton Lane/Goffs Oak Area and St James' Road Area by 359 metres.	11	2.75	12.75	Performs strongly against Green Belt purposes.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total	Total weighted	Comments	Total	Total weighted	Comments	Total	Total weighted	Total	
C22	5	5	Contributes to the separation of the St Burton Lane/ Goffs Lane area and Goffs Oak.	5	5	Includes Burton Lane/ Goffs Oak Area which connects to the large urban area of Broxbourne, St James' Road Area and Hammond Street Area	8	2	12	Performs strongly against Green Belt purposes 1 and 2, and plays an average to poor role against Purpose 3.
C23	5	5	Separates the St James Road area and the Burton Lane/ Goffs Lane area.	5	5	Separates Burton Lane/ Goffs Oak Area and St James' Road Area by 158 metres.	14	3.5	13.5	
C24	5	5	Separates the St James Road area and Goffs Oak.	5	5	Separates St James' Road Area and Goffs Oak by 210 metres.	13	3.25	13.25	Performs strongly against Green Belt purposes.
C25	5	5	Separates the St James Road area and Goffs Oak.	5	5	Separates St James' Road Area and Goffs Oak by 171 metres.	9	2.25	12.25	Performs strongly against Green Belt purposes.
C26	5	5	Separates the St James Road area and Goffs Oak.	5	5	Separates St James' Road Area and Goffs Oak by 304 metres.	9	2.25	12.25	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
C27	5	5	Contributes to the separation of the St James Road area and Goffs Oak.	5	5	Separates St James' Road Area and Goffs Oak by 495 metres.	6	1.5	11.5	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
C28	5	5	Contributes to the separation of the St James Road area and Goffs Oak.	5	5	Separates St James' Road Area and Goffs Oak by 498 metres.	9	2.25	12.25	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weight ed	Total	Comments	Total	Total weighted	Total	Total weighted	
C29	5	5	Contributes to the separation of the St James Road area and Goffs Oak. Also contributes to the separation of the large urban area of Broxbourne and Goffs Oak.	4	4	Separates St James' Road Area and Goffs Oak by 619 metres.	11	2.75	11.75	Performs strongly against Green Belt purposes.
C30	5	5	Contributes to the separation of Goffs Oak and the Hammond Street area.	4	4	Separates Hammond Street Area and Goffs Oak by 653 metres.	11	2.75	11.75	Performs strongly against Green Belt purposes.
C31	5	5	Separates the distinct settlements of Goffs Oak and Cuffley.	5	5	Separates Cuffley and Goffs Oak by 463 metres.	13	3.25	13.25	Performs strongly against Green Belt purposes.
C32	0	0	Most of the sub area separates land within the same area- Goffs Oak, although some land is also outside of the outline of the urban area.	4	4	Separates Cuffley and Goffs Oak by 887 metres.	6	1.5	5.5	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Consider revising boundary as some land is outside of the outline of the urban area. Of medium to low countryside value. Consider possible release (of at a substantial portion) from Green Belt.
C33	0	0	Separates land within the same area- Goffs Oak	4	4	Separates Cuffley and Goffs Oak by 972 metres.	9	2.25	6.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of medium to low countryside value. Consider possible release from Green Belt.
C34	5	5	Contributes to the separation of Goffs Oak and Cuffley.	4	4	Separates Cuffley and Goffs Oak by 829 metres.	6	1.5	10.5	Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.
C35	5	5	Provides a barrier between an existing large urban area (Cuffley) and open green belt.	4	4	Separates Cuffley and Hammond Street Area by 975 metres.	11	2.75	11.75	Performs strongly against Green Belt purposes.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total	Total weighted	Comments	Total	Total weighted	Comments	Total	Total weighted	Total Score	
C36	5	5	Surrounded on all sides by Green Belt land	2	2	Separates Newgate Street Area and Hammond Street Area by 1677 metres.	9	2.25	9.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs a medium to poor role against Green Belt Purposes 2 and 3.
C37	5	5	Provides a barrier between an existing large urban area and open green belt.	2	2	Separates Newgate Street Area and Hammond Street Area by 1677 metres.	9	2.25	9.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs a medium to poor role against Green Belt Purposes 2 and 3.
D1	5	5	Provides a barrier between an existing large urban area and open green belt.	4	4	Separates Burton Lane/Goffs Oak Area and Goffs Oak by 785 metres.	6	1.5	10.5	Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.
D2	5	5	Contributes to the separation Goffs Oak from the Burtons Lane/ Goffs Lane area and the large urban area of Broxbourne.	5	5	Separates Burton Lane/Goffs Oak Area and Goffs Oak by 326 metres.	16	4	14	Performs strongly against Green Belt purposes.
D3	5	5	Surrounded on all sides by Green Belt land	4	4	Separates large urban area of Broxbourne and Burton Lane/Goffs Oak Area by 830 metres.	9	2.25	11.25	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
D4	5	5	Contributes to the separation of the large urban area of Broxbourne and the Burtons Lane/ Goffs Lane area. The eastern part of the sub of the area also contributes to the separation of two parts of the same urban area.	5	5	Separates large urban area of Broxbourne and Burton Lane/Goffs Oak Area by 135 metres.	14	3.5	13.5	Performs strongly against the Green Belt purposes, and thus should be retained. A discreet release of a small part of the sub area that separates two parts of the existing urban area may be appropriate.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total	Total weighted	Comments	Total	Total weighted	Comments	Total	Total weighted	Total Score	
D5	5	5	Technically this contributes to the separation of the large urban area of Broxbourne and the Burtons Lane/ Goffs Lane area. It should be noted that this sub area is in practice existing housing.	5	5	Includes the row of houses to the south of the Large urban area of Broxbourne.	8	2	12	Performs strongly against the Green Belt purposes, and thus ion theory should be retained, although really it represents existing housing..
D6	0	0	Separates two parts of the same urban area? Or separates the area north of Bury Green and Flamstead End?	4	4	Separates large urban area of Burton Lane/Goffs Oak Area by 842 metres.	14	3.5	7.5	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of medium countryside value. Consider possible release from Green Belt.
D7	0	0	Separates two parts of the same urban area? Or separates the area north of Bury Green and Flamstead End?	3	3	Separates large urban area of Burton Lane/Goffs Oak Area by 1235 metres.	11	2.75	5.75	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of medium countryside value. Consider possible release from Green Belt.
D8	0	0	Separates two parts of the same urban area? Or separates the area north of the area north of Bury Green and Flamstead End?	3	3	Separates large urban area of Burton Lane/Goffs Oak Area by 1251 metres.	9	2.25	5.25	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of medium countryside value. Consider possible release from Green Belt.
D9	5	5	Provides a barrier between an existing <i>large</i> urban area and open green belt.	4	4	Separates large urban area of Burton Lane/Goffs Oak Area by 805 metres.	9	2.25	11.25	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
D10	5	5	Provides a barrier between an existing <i>large</i> urban area and open green belt.	1	1	Separates large urban area of Burton Lane/Goffs Oak Area by 2442 metres.	14	3.5	9.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weighted	Total weight ed	Comments	Total	Total weighted	Total	Total weighted	
D11	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Goffs Oak by 2428 metres.	9	2.25	8.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
D12	5	5	Provides a barrier between an existing large urban area and open green belt.	3	3	Separates large urban area of Burton Lane/Goffs Oak Area by 1269 metres.	6	1.5	9.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs fairly well against Green Belt Purpose 2. Performs poorly against Green Belt Purpose 3.
D13	0	0	Separates two parts of the same urban area.	3	3	Separates large urban area of Burton Lane/Goffs Oak Area by 1265 metres.	6	1.5	4.5	Performs poorly against the Green Belt purposes, its location meaning that it does little in terms of preventing sprawl. In reality, also does little to separate existing settlements and thus, if anything, could score lower than that attributed here. Of low countryside value. Consider possible release from Green Belt.
D14	5	5	Provides a barrier between an existing large urban area and open green belt.	4	4	Separates large urban area of Burton Lane/Goffs Oak Area by 791 metres.	11	2.75	11.75	Performs strongly against the Green Belt purposes
D15	5	5	Contributes to the separation of Waltham Cross and Cheshunt. Also provides a barrier between the large built up urban area and the open Green Belt.	2	2	Separates large urban area of Broxbourne and Enfield by 1751 metres.	16	4	11	Performs strongly against purposes 1 and 3, but poorly against purpose 2
D16	5	5	Contributes to the separation of Waltham Cross and Cheshunt	2	2	Separates large urban area of Broxbourne and Enfield by 1880 metres.	13	3.25	10.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Achieves a medium-low score against Green Belt Purpose 2.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weighted	Total weight ed	Comments	Total	Total weighted	Total	Total weighted	
D17	5	5	Contributes to the separation of Waltham Cross and Cheshunt. Also contributes to the separation of two parts of the same urban area. Consider revising boundary to the very north and very south east to reflect relationship with urban area.	3	3	Separates large urban area of Broxbourne and Enfield by 1402 metres.	13	3.25	11.25	Performs strongly against purpose 1, and has a medium/ good role against purposes 2 and 3.
D18	5	5	Contributes to the separation of Waltham Cross and Cheshunt	3	3	Separates large urban area of Broxbourne and Enfield by 1488 metres.	13	3.25	11.25	Performs strongly against purpose 1, and has a medium/ good role against purposes 2 and 3.
D19	5	5	Provides a barrier between an existing large urban area and open green belt.	2	2	Separates large urban area of Broxbourne and Enfield by 1751 metres.	13	3.25	10.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Achieves a medium-low score against Green Belt Purpose 2.
D20	5	5	Surrounded on all sides by Green Belt land	2	2	Separates large urban area of Broxbourne and Enfield by 1752 metres.	14	3.5	10.5	Performs well against Green Ebit purposes 1 and 3, but poorly against purpose 2.
D21	5	5	Surrounded on all sides by Green Belt land	2	2	Separates large urban area of Broxbourne and Enfield by 1743 metres.	9	2.25	9.25	Performs a strong role under Green Ebt Purpose 1 and thus merits retention. Performs a medium to poor role against Green Belt Purposes 2 and 3.
D22	5	5	Surrounded on all sides by Green Belt land	2	2	Separates large urban area of Broxbourne and Enfield by 1736 metres.	6	1.5	8.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
D23	5	5	Surrounded on all sides by Green Belt land	1	1	Separates large urban area of Broxbourne and Enfield by 2987 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total	Total weighted	Comments	Total	Total weighted	Comments	Total	Total weighted	Total Score	
D24	5	5	Surrounded on all sides by Green Belt land	1	1	Separates Burton Lane/Goffs Oak Area and Enfield by 3000 metres.	9	2.25	8.25	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
D25	5	5	Surrounded on all sides by Green Belt land	1	1	Separates Goffs Oak and Enfield by 3819 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
D26	5	5	Surrounded on all sides by Green Belt land	1	1	Separates Goffs Oak and Enfield by 3789 metres.	14	3.5	9.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 3. Performs poorly against Green Belt Purposes 2.
D27	5	5	Separates the distinct settlements of Goffs Oak and Cuffley.	5	5	Separates Cuffley and Goffs Oak by 455 metres.	11	2.75	12.75	Performs strongly against the Green Belt purposes.
D28	5	5	Surrounded on all sides by Green Belt land	1	1	Separates Goffs Oak and Enfield by 4032 metres.	6	1.5	7.5	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Performs poorly against Green Belt Purposes 2 and 3.
E1	5	5	Contributes to the separation of the large urban area of Broxbourne and the existing settlement of St. Margarets.	5	5	Separates large urban area of Broxbourne and Stanstead St Margarets by 377 metres.	6	1.5	11.5	Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.
E2	5	5	Contributes to the separation of the large urban area of Broxbourne and the existing settlement of St. Margarets.	5	5	Separates large urban area of Broxbourne and Stanstead St Margarets by 481 metres.	9	2.25	12.25	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
E3	5	5	Contributes to the separation of the large urban area of Broxbourne and a small existing distinct settlement to the immediate south-east.	5	5	Separates large urban area of Broxbourne and Nazeing Mead by 108 metres.	11	2.75	12.75	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
E4	5	5	Separates the eastern area of Broxbourne and a small existing distinct settlement to the east.	5	5	Separates large urban area of Broxbourne and Nazeing Mead by 300 metres.	9	2.25	12.25	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Total Score	Analysis
	Total weight ed	Total Comments	Total weighted	Total weight ed	Comments	Total	Total weighted	Total	Total weighted		
E5	5	5	Separates the eastern area of Broxbourne and a small existing distinct settlement to the east.	4	4	Separates large urban area of Broxbourne and Nazeing Mead by 905 metres.	13	3.25	12.25		Performs strongly against the Green Belt purposes.
E6	5	5	Contributes to the separation of the eastern area of Broxbourne and a small existing distinct settlement to the east. Also contributes to the separation of the large urban area of the Broxbourne urban area from Lower Nazeing.	4	4	Separates large urban area of Broxbourne and Carthagena Estate by 738 metres.	9	2.25	11.25		
E7	5	5	Contributes to the separation of the eastern area of Broxbourne and a small existing distinct settlement to the east. Also contributes to the separation of the large urban area of the Broxbourne urban area from Lower Nazeing.	4	4	Separates large urban area of Broxbourne and Carthagena Estate by 682 metres.	3	0	9		Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
E8	5	5	Contributes to the separation of the large urban area of the Broxbourne urban area from Lower Nazeing	4	4	Separates large urban area of Broxbourne and Carthagena Estate by 682 metres.	8	2	11		Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs well against Green Belt Purpose 2. Performs very poorly against Green Belt Purposes 3.
E9	5	5	Contributes to the separation of the large urban area of Broxbourne Keysers Estate/ Lower Nazeing.	5	5	Separates large urban area of Broxbourne and Keysers Estate by 447 metres.	13	3.25	11		Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.
E10	5	5	Separates the large urban area of Broxbourne and Keysers Estate.	5	5	Separates large urban area of Broxbourne and Keysers Estate by 241 metres.	8	2	12		Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weight ed	Total Comments	Total weighted	Total	Total weighted	Total	Total Score	
E11	5	5	Separates the eastern area of Broxbourne and Keyser's Estate.	5	5	Separates large urban area of Broxbourne and Keyser's Estate by 263 metres.	6	1.5	11.5	Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.
E12	5	5	Separates the large urban area of Broxbourne and Keyser's Estate.	5	5	Separates large urban area of Broxbourne and Keyser's Estate by 234 metres.	12	3	13	Performs strongly against the Green Belt purposes.
E13	5	5	Separates the large urban area of Broxbourne and Keyser's Estate.	5	5	Separates large urban area of Broxbourne and Keyser's Estate by 294 metres.	8	2	12	Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.
E14	5	5	Separates the large urban area of Broxbourne and Keyser's Estate.	5	5	Separates large urban area of Broxbourne and Keyser's Estate by 346 metres.	8	2	12	Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.
E15	0	0	Separates two parts of the same urban area.	5	5	Separates large urban area of Broxbourne and Keyser's Estate by 433 metres.	8	2	7	Performs relatively poorly against Green Belt purposes 1 and 3. However, although it separates two parts of the same urban area, it also separates the large urban area of Broxbourne and Keyser's Estate, which are less than 500 metres apart. Consider for release, but carefully address its importance in terms of separating Broxbourne from Keyser's Estate.
E16	5	5	Separates the large urban area of Broxbourne and Keyser's Estate.	5	5	Separates large urban area of Broxbourne and Keyser's Estate by 229 metres.	11	2.75	12.75	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
E17	5	5	Separates the large urban area of Broxbourne and Keyser's Estate.	5	5	Separates large urban area of Broxbourne and Keyser's Estate by 320 metres.	6	1.5	11.5	Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weight ed	Total Comments	Total weighted	Total	Total weighted	Total	Total Score	
E18	5	5	Separates the large urban area of Broxbourne and Keyzers Estate.	5	5	Separates large urban area of Broxbourne and Keyzers Estate by 148 metres.	14	3.5	13.5	Performs strongly against the Green Belt purposes.
E19	5	5	Provides a barrier between an existing large urban area and open green belt.	4	4	Separates large urban area of Broxbourne and Keyzers Estate by 613 metres.	12	3	12	Performs strongly against the Green Belt purposes.
E20	5	5	Provides a barrier between an existing large urban area and open green belt.	4	4	Separates large urban area of Broxbourne and Keyzers Estate by 974 metres.	9	2.25	11.25	Performs strongly against the Green Belt purposes.
E21	5	5	Provides a barrier between an existing large urban area and open green belt.	4	4	Separates large urban area of Broxbourne and Keyzers Estate by 981 metres.	6	1.5	10.5	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
E22	5	5	Provides a barrier between an existing large urban area and open green belt.	3	3	Separates large urban area of Broxbourne and Keyzers Estate by 1025 metres.	11	2.75	10.75	Performs strongly against Green Belt purposes 1 and 2, and plays a poor role against Purpose 3.
E23	5	5	Provides a barrier between an existing large urban area and open green belt.	3	3	Separates large urban area of Broxbourne and Keyzers Estate by 1080 metres.	14	3.5	11.5	Performs strongly against Green Belt purposes 1 and 2, and plays an average role against Purpose 3.
E24	5	5	Provides a barrier between an existing large urban area and open green belt.	3	3	Separates large urban area of Broxbourne and Keyzers Estate by 1362 metres.	16	4	12	Performs strongly against purpose 1, and performs a medium-strong role against purposes 2 and 3.
E25	5	5	Provides a barrier between an existing large urban area and open green belt.	1	1	Separates large urban area of Broxbourne and Waltham Abbey by 2511 metres.	9	2.25	8.25	Performs well against the Green Belt purpose 1, as it is open in nature and provides separation between Broxbourne and the open Green Belt beyond. Of medium countryside value.

Sub Area	Purpose 1. Preventing Sprawl			Purpose 2. Separating			Purpose 3.			Analysis
	Total weight ed	Total Comments	Total weighted	Total weight ed	Comments	Total	Total weighted	Total	Total weighted	
E26	5	5	5	1	1	Separates large urban area of Broxbourne and Waltham Abbey by 2409 metres.	6	1.5	7.5	Performs well against the Green Belt purpose 1, as it is open in nature and provides separation between Broxbourne and the open Green Belt beyond. Of medium countryside value.
E27	5	5	5	3	3	Separates large urban area of Broxbourne and Waltham Abbey by 1486 metres.	8	2	10	Performs a strong role under Green Belt Purpose 1 and thus merits retention. Also performs reasonably well against Green Belt Purpose 3. Performs fairly poorly against Green Belt Purpose 2.
E28	5	5	5	5	5	Separates large urban area of Broxbourne and Waltham Abbey by 319 metres.	13	3.25	13.25	Performs strongly against the Green Belt purposes.

### **Appendix 3: Further details by sub area for Green Belt Purpose 3. Safeguarding the countryside from encroachment**

#### **Green Belt Area A**

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
A1	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
A2	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
A3	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - School Buildings/Grounds. Agriculture - Grade 3.
A4	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Large Buildings and Grounds. Agriculture - Grade 3, Non-Agricultural.
A5	0	3	5	3	Nature Conservation - None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
A6	0	3	3	3	Nature Conservation - None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
A7	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
A8	0	5	0	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Predominantly Housing with some Greenfield Land. Agriculture - Grade 3.
A9	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
A10	0	5	5	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
A11	0	5	0	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Predominantly Housing with some Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
A12	0	5	5	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
A13	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Housing with some Greenfield Land. Agriculture - Grade 3.
A14	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Grade 4, Non-Agricultural.
A15	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Grade 4, Non-Agricultural.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
A16	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Conference Centre and Grounds. Agriculture - Grade 4.
A17	3	5	5	3	Nature Conservation - Local Wildlife Sites - Lodge Hollow and Spital Brook, Knowle Thicket by Cock Lane Ford. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 4.
A18	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 4, Non-Agricultural.
A19	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 4, Non-Agricultural.
A20	0	5	5	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 4.
A21	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - School Buildings/Grounds. Agriculture - Grade 4, Non-Agricultural.
A22	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 4.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
A23	5	5	5	3	Nature Conservation – Wormley-Hoddesdonpark Woods (SAC), Wormley-Hoddesdonpark Wood North (SSSI) Local Wildlife Sites - Ermine Street, Pasture/Wood by Martin's Green, Round Grove, Hoddesdonbury Pasture and Beech Grove, Hoddesdon Lodge Meadows, Hoddesdonpark Wood.  Trees - Ancient Woodland (Box Wood), Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Grade 4, Non-Agricultural.
A24	3	5	0	0	Nature Conservation – Local Wildlife Site - Box Wood. Trees - Tree Preservation Orders. Greenfield Land - Housing and Gardens. Agriculture - Non-Agricultural.
A25	3	5	5	3	Nature Conservation – Local Wildlife Sites - Box Wood, Ermine Street. Trees - Ancient Woodland (Box Wood), Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Grade 4, Non-Agricultural.
A26	3	3	3	3	Nature Conservation – Local Wildlife Site - Box Wood. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.

## Green Belt Area B

Sub Area	Nature Conservation Value	Trees and Hedgerows	Greenfield Land	Agriculture	Comments
B1	5	5	5	3	Nature Conservation – Wormley-Hoddesdon Woods (SAC), Wormley-Hoddesdon Park Wood North (SSSI), Local Wildlife Site - Coleman Green and White Stubbs Lane, Cheshunt Grove, Broxbourne Woods. Trees - Ancient Woodland (Box Wood), Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 4, Non-Agricultural.
B2	3	5	3	3	Nature Conservation – Local Wildlife Sites - Baas Hill Common, Broxbournebury Park, Broxbournebury Golf Course. Trees - Tree Preservation Orders. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3, Grade 4.
B3	3	3	5	3	Nature Conservation – Local Wildlife Site - Baas Hill Common. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
B4	3	3	5	3	Nature Conservation – Local Nature Reserve, Local Wildlife Site - Baas Hill Common. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
B5	0	5	3	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
B6	0	3	3	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 2, Grade 3.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
B7	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Grade 4.
B8	3	5	5	5	Nature Conservation – Local Wildlife Site - Wormley Parkland E. of A10. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 2, Grade 3.
B9	3	5	5	5	Nature Conservation – Local Wildlife Sites - Cheshunt Park Grasslands and Pond, Cheshunt Park Field, Cheshunt Park Farm Field, Candlestick Lane Meadows, Doggett Hill Wood N.W. of Cromwell Wood, Wood E. of Park Lane Paradise, Watercress Trot, Turnford Junction Meadow (West), Wormleybury Lake, Wormleybury Icehouse Woodland, Wormleybury Manor Woodland. Trees - Ancient Woodland (Spring Wood), Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 2, Grade 3, Grade 4.
B10	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
B11	0	5	5	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
B12	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
B13	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - School Buildings/Grounds. Agriculture - Grade 3.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
B14	3	5	0	3	Nature Conservation – Local Wildlife Site - Doggett Hill Wood N.W. of Cromwell Wood. Trees - Tree Preservation Orders. Greenfield Land - Mixture of extensive Farm Buildings and Housing. Agriculture - Grade 3.
B15	3	5	5	3	Nature Conservation – Local Wildlife Sites - Copse S. of Home Farm, Coleman Green and White Stubbs Lane. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Grade 4.
B16	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens, with some farm buildings. Agriculture - Grade 4.
B17	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
B18	3	5	0	3	Nature Conservation – Local Wildlife Sites - Wormleybury Churchyard, Wormleybury Manor Woodland. Trees - Tree Preservation Orders. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
B19	3	5	5	5	Nature Conservation – Local Wildlife Sites - Baas Hill Meadow, Baas Hill Common. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 2, Grade 3, Grade 4.
B20	0	5	5	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Grade 4.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
B21	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees Greenfield Land - Mixture of extensive Farm Buildings and Housing. Agriculture - Grade 4.

## Green Belt Area C

	Nature Conservation Value	Trees and Hedgerows	Greenfield Land	Agriculture	Comments
C1	5	5	3	3	Nature Conservation – Wormley-Hoddesdon Woods (SAC), Wormley-Hoddesdon Wood South (SSSI), Local Wildlife Sites - Meadow by Long Grove, Wormley Wood, St. Lawrence Farm Field, Calves Croft Wood, Derry's Wood Fields, Meadow W. of Tanfield Stud Farm, Baisley's Wood, Cony Grove, Back Lane (north Wormley Wood), Biggs Grove. Trees - Ancient Woodland (Box Wood, Baisleys Wood, Thunderfield Grove, Biggs Grove), Tree Preservation Orders. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3, Grade 4, Non-Agricultural.
C2	0	3	0	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
C3	3	5	5	3	Nature Conservation – Local Wildlife Sites - Thunderfield Grove, Meadow by Park Lane Paradise, Thunderfield Grove Pastures, Gammon's Lane, Meadow by Park House, Meadow by Park Lane. Trees - Ancient Woodland (Thunderfield Grove), Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
C4	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Nursery Buildings with some Greenfield Land. Agriculture - Grade 3.

<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
C5 0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C6 0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
C7 0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C8 0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
C9 0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
C10 0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Extensive Nursery Buildings. Agriculture - Grade 3.
C11 3	5	5	3	Nature Conservation – Local Wildlife Sites - Meadow by Forest View, Meadow N. of High View Farm, Lucas End Farm Pasture, West, Lucas End Meadows, East, Meadow N.E. of High View Farm, Hammonds Street Meadow, Hammond Hill Orchid Scrub, Hammond Street Scrub, Grassland S.E. of Hammond Street Scrub, Grassland S. of Hammond Street Scrub. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3.

<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
C12	0	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C13	3	3	3	Nature Conservation – Local Wildlife Sites - Meadow W. of Whitehouse Farm, Longmead - Status under review. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land.
C14	0	3	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
C15	0	5	0	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Large Buildings and Grounds. Agriculture - Grade 3.
C16	0	3	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Large Nursery Buildings. Agriculture - Grade 3.
C17	0	5	5	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
C18	0	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C19	3	5	5	Nature Conservation – Local Wildlife Site - Meadow S of Rosedale Sports ground - Status under review. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3.

<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
C20	0	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C21	0	3	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Extensive Nursery Buildings. Agriculture - Grade 3.
C22	0	5	0	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
C23	3	3	5	Nature Conservation – Local Wildlife Site - Meadow W of Tudor Villas - Status under review. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
C24	0	5	5	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Extensive Nursery Buildings. Agriculture - Grade 3.
C25	0	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C26	0	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C27	0	3	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Large Buildings and Grounds. Agriculture - Grade 3.

<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
C28	0	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C29	0	3	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Large Nursery Buildings. Agriculture - Grade 3.
C30	0	3	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Large Nursery Buildings. Agriculture - Grade 3.
C31	0	5	5	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
C32	0	3	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - School Buildings/Grounds. Agriculture - Grade 3.
C33	0	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C34	0	3	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Large Buildings (Scrap Yard?). Agriculture - Grade 3.
C35	0	3	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.

<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
C36	0	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
C37	0	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.

## Green Belt Area D

Sub Area	Nature Conservation Value	Trees and Hedgerows	Greenfield Land	Agriculture	Comments
D1	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - School Buildings/Grounds. Agriculture - Grade 3.
D2	3	5	5	3	Nature Conservation – Local Wildlife Site - Poyndon Farm. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
D3	3	3	0	3	Nature Conservation – Local Wildlife Site - South Lodge Pasture. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
D4	3	5	3	3	Nature Conservation – Local Wildlife Sites - South Lodge Pasture, Meadow N. of Barrow Lane. Trees - Tree Preservation Orders. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
D5	0	5	0	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.
D6	3	5	3	3	Nature Conservation – Local Wildlife Site - Bonney Grove Wood by B198. Trees - Tree Preservation Orders. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
D7	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
D8	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
D9	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
D10	3	3	5	3	Nature Conservation – Local Wildlife Sites - Burygreen Plantation, Old Rush Field, Broadfield Farm. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
D11	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
D12	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land – Cemetery. Agriculture - Grade 3.
D13	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land – Cemetery. Agriculture - Grade 3, Non-Agricultural.
D14	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
D15	3	3	5	5	Nature Conservation – Local Wildlife Site - Broom Hills. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 2, Grade 3, Non-Agricultural.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
D16	0	3	5	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 2, Non-Agricultural.
D17	0	3	5	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 2, Non-Agricultural.
D18	0	5	3	5	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Predominantly Greenfield Land.
D19	0	3	5	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 2, Non-Agricultural.
D20	3	3	5	3	Nature Conservation – Local Wildlife Sits - Broom Hills, Temple Bar Meadow. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
D21	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
D22	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - School Buildings/Grounds. Agriculture - Grade 3.
D23	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Stately Home and Grounds with some Greenfield Land. Agriculture - Grade 3.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
D24	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
D25	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land – Cemetery. Agriculture - Grade 3.
D26	3	3	5	3	Nature Conservation – Local Wildlife Site - Cattlins Wood. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
D27	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
D28	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens. Agriculture - Grade 3.

## Green Belt Area E

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
E1	0	3	3	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Non-Agricultural.
E2	3	3	3	0	Nature Conservation – Local Wildlife Site - Seniors Lake. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Non-Agricultural.
E3	0	3	3	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 2, Non-Agricultural.
E4	3	3	3	0	Nature Conservation – Local Wildlife Site - River Lea, Nazeing Mead. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Non-Agricultural.
E5	3	5	5	0	Nature Conservation – Local Wildlife Site - Admirals Walk Lake. Trees - Tree Preservation Orders. Greenfield Land - Greenfield Land. Agriculture - Non-Agricultural.
E6	3	3	3	0	Nature Conservation – Local Wildlife Sites - Broxbourne Gravel Pits, River Lea, Nazeing Mead. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Non-Agricultural.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
E7	0	3	0	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Weir and Boat moorings. Agriculture - Non-Agricultural.
E8	0	3	5	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Non-Agricultural.
E9	0	3	5	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 2, Non-Agricultural.
E10	0	3	0	5	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Swimming Pool and Car Park. Agriculture - Grade 2, Non-Agricultural.
E11	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Car Park, Some Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
E12	3	3	3	3	Nature Conservation – Local Wildlife Site - Broxbourne Meadows. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
E13	0	5	0	3	Nature Conservation – None. Trees - Tree Preservation Orders. Greenfield Land - Housing and Gardens with some Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
E14	0	3	5	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Non-Agricultural.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
E15	0	3	5	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Non-Agricultural.
E16	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
E17	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - School Buildings/Grounds. Agriculture - Grade 3.
E18	3	3	5	3	Nature Conservation – Local Wildlife Site - Silvermead. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
E19	3	3	3	3	Nature Conservation – Local Wildlife Site - Swamp S. of Silvermead. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
E20	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3.
E21	0	3	0	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Housing and Gardens with some Greenfield Land. Agriculture - Grade 3.
E22	0	3	5	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.

<b>Sub Area</b>	<b>Nature Conservation Value</b>	<b>Trees and Hedgerows</b>	<b>Greenfield Land</b>	<b>Agriculture</b>	<b>Comments</b>
E23	3	3	5	3	Nature Conservation – Local Wildlife Site - Slip Lane Open Space. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3.
E24	5	3	5	3	Nature Conservation – Lee Valley (SPA), Turnford & Cheshunt Pits (SSSI). Local Wildlife Site - Cheshunt and Turnford Pits. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
E25	0	3	3	3	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Grade 3, Non-Agricultural.
E26	0	3	3	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Predominantly Greenfield Land. Agriculture - Non-Agricultural.
E27	0	3	5	0	Nature Conservation – None. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Non-Agricultural.
E28	5	3	5	0	Nature Conservation – Lee Valley (SPA), Turnford & Cheshunt Pits (SSSI). Local Wildlife Site - Cheshunt Marsh and Bowyers Water. Trees - Unprotected Trees. Greenfield Land - Greenfield Land. Agriculture - Non-Agricultural.

## Appendix 4: Assessment of Green Belt sub area boundaries

### Defensible Boundary Classification

Strong	Weak
Motorways	
Functioning mainline railway lines	Disused railway lines
District distributor roads forming boundary (not bisecting Green Belt)	Other classified roads Private/unmade roads Rights of way
Rivers, watercourses and significant drainage features	Park boundaries
Prominent physical features (i.e. ridgeline, non-intermittent waterways)	Power lines
Protected hedgerows / woodlands	Tree-lines public footpaths Non protected hedgerows / woodlands
Residential settlements with clear define physical boundaries (not back gardens)	Back gardens to residential properties  Non-residential development with weak or indeterminate boundaries
Other development with strong established boundaries	Recreational/undefined field boundaries
	Cemeteries

### Location of sub-area in relation to the Green Belt boundary (predominantly)

OE = Outer edge of Green Belt

IE = Inner edge of Green Belt (adjoins the built-up areas)

WGB = Within the Green Belt (boundary not an issue)

Sub Area Ref	Type of Boundary/ Nature of Sub Area	Location of boundary	Strength of boundary	Comments/ possible changes to boundary	Change number
A1	Trees	OE	S	No change	
A2	Open to the north. Rear gardens to existing residential properties to the north east. Ill-defined mix of open field and tree lines to south west.	OE & IE	W	Option 1 - remove two protrusions on eastern boundary	1.1
A3	Well defined tree line	IE	S	No change (too important in separating Broxbourne from the neighbouring settlement around Hertford Heath to consider revisions)	
A4	Distributor road	IE	S	No change (too important in separating Broxbourne from the neighbouring settlement around Hertford Heath to consider revisions)	
A5	Woodland	OE	S	Option 1 – Consider possible release along with A6 due to poor purpose performance.	1.9
A6	Ill-defined field boundary and rear gardens	IE	W	Option 1 – Consider possible release along with A5 due to poor purpose performance (school).	1.10
A7	Field edged with trees	OE	S	No change	
A8	Existing property	OE	S	No change	
A9	A10 and field edged with trees	OE	S	No change	
A10	Tree lined behind rear gardens of homes on High Wood Road	IE	W	Option 1 - no change Option 2 - remove A10 from Green Belt and consider moving the boundary to the A10 dual carriageway. Sub area A10 can be re-designated as safeguarded land.	2.1

<b>Sub Area Ref</b>	<b>Type of Boundary/ Nature of Sub Area</b>	<b>Location of boundary</b>	<b>Strength of boundary</b>	<b>Comments/ possible changes to boundary</b>	<b>Change number</b>
A11	North east boundary of Roselands House is tree line behind rear gardens of homes on High Wood Road Southern boundary side curtilage of adjoining property on College Road with a longer rear garden than any other property on the road	IE	W W	Option 1 - no change Option 2 – Consider releasing the site	2.2
A12	Whole sub-area is woodland but not in the Landscape Character Area Eastern boundary is the rear gardens of homes on College Road Western boundary is along Hertford Road	IE OE	W S	Option 1 – consider removing from the Green Belt due to poor performance against Green Belt purposes, and protect woodland with an environmental protection policy.	1.9
A13	Ill-defined tree line with residential properties all along Hereford Road	IE	W	Option 1 - no change Option 2 - remove A13 from the Green Belt.	2.3
A14	Tree lined along a weak meander stream, rear gardens and A10	IE	S	No change <i>(See also Section 8 of main report)</i>	
A15	Field with a pavilion but with poorly defined tree line to east and side residential curtilages	WGB & part IE	- W	Option 1 - no change Option 2 – remove field to the east of the sub area and move boundary to the western edge, using the thick tree line as a new boundary. <i>(See also Section 8 of main report)</i>	2.4
A16	High Leigh Conference Centre	WGB	-	No change (no opportunities to improve boundary before the loss of open Green Belt land. <i>(See also Section 8 of main report)</i>	
A17	Various fields	WGB	-	No change (no opportunities to improve boundary before the loss of open Green Belt land. <i>(See also Section 8 of main report)</i>	
A18	North rear gardens to homes on Lord Street South east distributor road	WGB & part IE	- W S	No change (no opportunities to improve boundary before the loss of open Green Belt land. <i>(See also Section 8 of main report)</i>	
A19	North boundary of Lowfield is rear gardens East is Park View road	IE	W S	No change (no opportunities to improve boundary before the loss of open Green Belt land. <i>(See also Section 8 of main report)</i>	
A20	Treed area along rear gardens of homes on Woodlands Drive	IE	W	Option 1 – consider removal of A20 and A21 and move boundary to the tree line along the eastern boundary of the A12, then leave existing flood plain and conservation area designations.	1.12
A21	South boundary of the school is a drainage & path East boundary of both schools is rear gardens	IE IE	S W	Option 1 – see A20.	1.13
A22	Tree edged field along a distributor road	WGB	-	No change <i>(See also Section 8 of main report)</i>	
A23	Woodland and fields	OE	S	No change	
A24	Existing properties	WGB	-	No change	
A25	Woodlands and fields	OE	S	No change	
A26	Existing buildings	WGB	-	No change	
B1	Motorway	OE & IE	S	No change	
B2	Motorway	WGB	-	No change	
B3	Only part of A10 dual carriageway itself	IE	S	No change	
B4	North- rear gardens of homes on Baes Hill Close South East- along a stream and Local Plan proposed Waterside Green Chain	IE	W S	No change, no opportunities to improve boundary before the loss of open Green Belt land. <i>(See also Section 8 of main report)</i>	

<b>Sub Area Ref</b>	<b>Type of Boundary/ Nature of Sub Area</b>	<b>Location of boundary</b>	<b>Strength of boundary</b>	<b>Comments/ possible changes to boundary</b>	<b>Change number</b>
B5	North - rear gardens of homes on Bell Land and school boundary East- round rear gardens of two small groups of residential properties then along a stream and Local Plan proposed Waterside Green Chain	IE	W W	No change (See also Section 8 of main report)	
B6	Field and playing field	WGB	--	No change (See also Section 8 of main report)	
B7	Allotment gardens along a stream and Local Plan proposed Waterside Green Chain	IE	W	No change (See also Section 8 of main report)	
B8	Wormley along a stream and Local Plan proposed Waterside Green Chain	IE	S	No change (See also Section 8 of main report)	
B9	East - A10 South golf course with a small area along Park Lane	WGB part IE	- S	No change	
B10	Edge of golf course that runs along a stream and Local Plan proposed Waterside Green Chain	IE	S	No change	
B11	Reservoir edged by trees and Brownfield Lane	IE	S	No change	
B12	Rear gardens of homes on Greenbank	IE	W	Option 1 - remove a small strip of Green Belt and move north to stronger tree line	1.2
B13	School boundary lined with trees and edge of Park Lane	IE	S	No change	
B14	Cheshunt Park Farm	WGB	-	No change	
B15	Fields	WGB & OE	- S	No change	
B16	White Stubbs Farm	OE	S	No change	
B17	Carneles Green properties	WGB	-	No change	
B18	Wormleybury properties	WGB	-	No change	
B19	Fields and few properties	WGB	-	No change	
B20	Golf course with club house	WGB	-	No change	
B21	Farms	WGB	-	No change	
C1	Mostly outer edge of the Green Belt but with a thin strip of common land within the residential area	WGB IE	- W	Option 1 - remove the thin strip from Green Belt between Nightingale Road and Dalia Close but keep protective environmental policy for common land. It is difficult to see how land surrounded by development keeps the openness of the Green Belt.	1.5
C2	Various properties off Bread and Chasse Lane	WGB	-	No change	
C3	South - fields North - boundary along Appleby Street	WGB IE	- S	No change	
C4	Paradise nurseries	WGB	-	No change	
C5	Paradise House within wooded area	WGB	-	No change	
C6	Park House on edge of Park Lane	WGB & IE	- S	No change	
C7	Property on edge of Park Lane	WGB & IE	- S	No change	
C8	Property on edge of Park Lane	WGB & IE	- S	No change	
C9	Playing field on edge of Appleby Street	WGB & IE	- S	No change	
C10	Nurseries on Hammond Street within the Green Belt but between two residential areas	WGB	-	No change (See also Section 8 of main report)	

Sub Area Ref	Type of Boundary/ Nature of Sub Area	Location of boundary	Strength of boundary	Comments/ possible changes to boundary	Change number
C11	Most of sub-area is within the Green Belt  Southern side of Hammond Street Area with rear gardens and side curtilages and side cartilages of Broadgreen Road  South west - boundary along Newgatestreet Road, rear gardens of Colston Crescent & Melvyn Close	WGB  IE  IE	-  W  W	No change  (See also Section 8 of main report)	
C12	Nurseries	WGB	-	No change  (See also Section 8 of main report)	
C13	Most of sub-area is within the Green Belt small boundary edge along Crouch Lane  Southern boundary – rear gardens of homes in St James area.	WGB & IE  W	-  S	No change  (See also Section 8 of main report)	
C14	Most sub-area is within the Green Belt small boundary edge along Crouch Lane	WGB & IE	-  S	No change  (See also Section 8 of main report)	
C15	Most sub-area is within the Green Belt small boundary edge along Rags Lane	WGB & IE	-  S	No change  (See also Section 8 of main report)	
C16	Nurseries	WGB	-	No change  (See also Section 8 of main report)	
C17	Most sub-area is within the Green Belt South west (St James Rd Area) rear gardens on Great Groves  Rear gardens of homes in Rosedale area	WGB  IE  IE	-  W  W	Option 1 – consider removal of small triangular area to the east that does not contribute to the Green Belt purposes.  (See also Section 8 of main report)	
C18	The Langdons western boundary tight to rear gardens of homes on Great Groves	IE	W	No change  (See also Section 8 of main report)	
C19	Most of sub-area is within the Green Belt Boundary tight to rear gardens of homes on Caldecot Avenue and Claremont	WGB	-  W	Option 1 – consider possible release small triangular area to the south that performs poorly against the Green Belt purposes.  (See also Section 8 of main report)	1.14
C20	Boundary around the playing field and rear gardens of homes on Conifer Close  Small triangle piece of Green Belt separated from the playing field on the north side of Andrew's Lane and in front of homes accessed also from Andrew's Lane	IE	S  W	Option 1 – consider possible release small triangular area on north side of Andrews Lane that performs poorly against the Green Belt purposes.  (See also Section 8 of main report)	1.6
C21	Nurseries within Green Belt	WGB	-	No change  (See also Section 8 of main report)	
C22	Properties along Goff's Lane and within the Green Belt	WGB	-	No change  (See also Section 8 of main report)	
C23	Fields  Northern boundary- rear gardens of homes in St James area	WGB	W	No change, no opportunity to improve boundary.  (See also Section 8 of main report)	
C24	Nurseries within the Green Belt  Northern boundary- rear gardens of homes in St James area	WGB	-  W	No change, no opportunity to improve boundary.  (See also Section 8 of main report)	

<b>Sub Area Ref</b>	<b>Type of Boundary/ Nature of Sub Area</b>	<b>Location of boundary</b>	<b>Strength of boundary</b>	<b>Comments/ possible changes to boundary</b>	<b>Change number</b>
C25	(Playing) field with boundary along rear of properties on Valley View and Newgatestreet Road	IE	W	Option 1 - remove PH, move north to field boundary  (See also Section 8 of main report)	1.7
C26	West - field along the edge of Newgatestreet Road	IE	S	No change  (See also Section 8 of main report)	
	East – field along the tree line and edge of rear gardens of homes off The Asters	IE	W		
C27	Curtliage and access road to farm that edges rear gardens of Bartrop Close	IE	S	No change  (See also Section 8 of main report)	
C28	Nurseries within Green Belt	WGB	-	No change  (See also Section 8 of main report)	
C29	Nurseries within Green Belt	WGB	-	No change  (See also Section 8 of main report)	
C30	Nurseries within Green Belt on east and wets side of Newgatestreet Road	WGB	-	No change  (See also Section 8 of main report)	
C31	Most of sub-area within the Green Belt up to outer boundary of the Borough	WGB	-	Option 1 – no change	2.5
	South east - well defined field boundary and back gardens of Chiltern Close	IE	S	Option 2 - remove part of C31, C33 & C34 from Green Belt and move boundary to northern edge of woodland and field boundary and re-designate with appropriate environmental policies	
	South west- rear gardens of homes on Cuffley Hill	IE	W		
C32	School at rear of homes on Orchard Way	IE	W	Option 1 - remove the school from the Green Belt, move boundary to edge of school curtilage (school)	1.15
C33	Strip of land with poorly defined tree line at rear gardens of homes on Robinson Avenue	IE	W	Option 1 - consider removing C33 from Green Belt, moving the boundary to established hedgerow/trees.  Option 2 – see C31 option 2.	1.8
					2.6
C34	Strip within the Green Belt used for non residential use and rear gardens of homes on Cuffley Hill	IE	W	Option 1 – no change  Option 2 - see C31 option 2	2.7
C35	Defined wooded area on outer Green Belt boundary	OE	S	No change	
C36	Darnicle Hill nurseries	WGB	-	No change	
C37	Farm with green setting and boundary of rear and side curtilages of homes off Shambrook Road	IE	W	No change, no further opportunity to provide a stronger boundary	
D1	School off Little Piper's Close with strong tree line boundary	IE	S	Option 1 - no change Option 2 – to be consistent with other schools with immediate opportunities to provide an equivalent or stronger boundary, remove school from Green Belt, move boundary to southern and eastern edge of school curtilage (school)	2.8
D2	South of Goff's Oak residential area - northern boundary along rear gardens and allotment area defined by some hedges and trees  Rest of sub-area is within the Green Belt	IE	W	No change, no further opportunity to provide a stronger boundary	
D3	Properties off Halstead Hill within the Green Belt	WGB	-	No change, no further opportunity to provide a stronger boundary	

<b>Sub Area Ref</b>	<b>Type of Boundary/ Nature of Sub Area</b>	<b>Location of boundary</b>	<b>Strength of boundary</b>	<b>Comments/ possible changes to boundary</b>	<b>Change number</b>
D4	Most of the sub-area is within the Green Belt but there is a small edge along Goff's Lane	<b>WGB &amp; IE</b>	<b>- S</b>	No change	
D5	A strip of residential properties with rear gardens that vary in length that sprawl along Goff's Lane, but are completely within the Green Belt. The Green Belt boundary runs along the front side of these homes on Goff's Lane	<b>IE</b>	<b>S</b>	No change This strip of houses within the Green Belt is odd, but there are no further opportunities to provide a stronger boundary.	
D6	Green Belt boundary runs along Goff Lane in front of the school. The sub-area comprises two schools, field and wooded area.	<b>IE</b>	<b>S</b>	Option 1 – Removal of D6, D7 and D8 due to poor performance against purposes. Also, an even boundary would be created by moving the boundary to Lieutenant Ellis Way (school site).	1.16
D7	Allotments	<b>WGB</b>	<b>-</b>	Option 1 – Interconnected with D6, Option 1 (school)	1.17
D8	School with edge along the rear gardens of homes on Goff's Lane and Churchgate	<b>IE</b>	<b>W</b>	Option 1 – Interconnected with D6, Option 1 (school)	1.18
D9	Nurseries within the Green Belt	<b>WGB</b>	<b>-</b>	No change	
D10	Fields within the Green Belt	<b>WGB</b>	<b>-</b>	No change	
D11	Cemetery within the Green Belt	<b>WGB</b>	<b>-</b>	No change	
D12	Extension to the cemetery with boundary along the rear gardens of homes on Barrow Lane	<b>IE</b>	<b>W</b>	Option 1 - consider removal if D13 removed.	1.19
D13	Cemetery wedged within Barrow Land and Bury Green Road rear gardens	<b>IE</b>		Option 1 - Consider removal of D12 and D13 due to poor performance against Green Belt purposes, and move boundary to Lieutenant Ellis Way. If necessary, create a cemetery policy	1.20
D14	Field off Green Bury Way and irregular rear gardens	<b>IE</b>	<b>W</b>	Option 1 – no change  Option 2 - remove part of D14, move boundary to Lieutenant Ellis Way.	2.9
D15	North - boundary along rear gardens of homes on Temple Close and Hampden Crescent	<b>IE</b>	<b>W</b>	Option 1 – no change  Option 2 - remove part of D15 from Green Bury Way and Waterside Green Chains as this is already allocated in the Local Plan as policy EMP11, move boundary to Lieutenant Ellis Way then keep EMP11 and protection of Broom Hills designations.	2.10
D16	Well established field boundary with hedgerow along northern edge of school	<b>IE</b>	<b>S</b>	No change	
D17	North and south east boundary along rear gardens but field and park type land seems well defined edges	<b>IE</b>	<b>S</b>	No change	
D18	South east boundary along rear gardens/side curtilages but adjoining land has well defined edges	<b>IE</b>	<b>S</b>	No change	
D19	Most of sub-area is within the Green Belt with eastern boundary along Great Cambridge Road	<b>WGB &amp; IE</b>	<b>- S</b>	No change	
D20	Broom Hill wooded area	<b>WGB</b>	<b>-</b>	No change	
D21	Sports Ground	<b>WGB</b>	<b>-</b>	No change	
D22	College and grounds	<b>WGB</b>	<b>-</b>	No change	
D23	Temple House and grounds	<b>WGB</b>	<b>-</b>	No change	
D24	Theobalds Park Camp Site	<b>WGB</b>	<b>-</b>	No change	

<b>Sub Area Ref</b>	<b>Type of Boundary/ Nature of Sub Area</b>	<b>Location of boundary</b>	<b>Strength of boundary</b>	<b>Comments/ possible changes to boundary</b>	<b>Change number</b>
D25	Western Cemetery	WGB	-	No change	
D26	Fields and wooded areas along the M25 Borough administrative boundary	OE	S	No change	
D27	North - tight boundary along rear gardens of homes off Broadfields, Greenways and Moorhurst Avenue	OE & IE	W	No change, there is no further opportunity to provide a stronger boundary	
D28	Theobalds Manor	WGB	-	No change	
E1	Boundary follows Waterside Green Chain	IE	S	No change	
E2	Boundary follows the river and Borough administrative boundary	OE	S	No change	
E3	Boundary follows the river and Borough administrative boundary and includes the Weir area adjacent to Essex Road	OE	S	No change	
E4	Sub-area includes the Caravan Park with boundary following the river and Borough administrative boundary	OE	S	No change	
E5	Admirals Walk Lake North - rear gardens of homes on Conduit Lane East West - follows Waterside Green Chain South - rear gardens of homes on Admirals Lane and Pallet Court	IE IE IE	W S W	No change, there is no further opportunity to provide a stronger boundary	
E6	Sand and Gravel Works area West - along the operating railway track East - Borough administrative boundary	IE OE	S S	No change	
E7	Strip of land with trees on edge of water area along Borough administrative boundary	OE	S	No change	
E8	Ridge with trees along the operating railway track	IE	S	No change	
E9	Wedge of land along side the river along Borough administrative boundary	OE	S	No change	
E10	Lido along side the river along Borough administrative boundary	OE	S	No change	
E11	Boundary follows the river and on edge of Borough administrative boundary	OE	S	No change	
E12	Open green area on east operating railway line and within the s  North - tight boundary to rear gardens of homes on Winford Drive	WGB IE	- W	No change- no opportunities to strengthen boundary before coalescence with Keysers Estate.	
E13	Residential properties with green area with some trees North - boundary along Station Road	WGB IE	- S	No change- no opportunities to strengthen boundary before coalescence with Keysers Estate.	
E14	Field along Waterside Green Chain North - boundary along Station Road	IE	S	No change- no opportunities to strengthen boundary before coalescence with Keysers Estate.	
E15	Recreation ground bound by Station Road, Church View and Mill Lane	IE	S	Option 1 – consider removal due to poor performance against GreenBelt purposes. Use distributor road to east as a new boundary	
E16	Allotments with boundary along track off Mill Lane	IE	S	No change- no opportunities to strengthen boundary before coalescence with Keysers Estate.	
E17	School with access and boundary along track off Mill Lane	IE	S	No change- no opportunities to strengthen boundary before coalescence with Keysers Estate.	
E18	West - open green land along operating railway track East - Borough administrative boundary	IE OE	S S	No change	

Sub Area Ref	Type of Boundary/ Nature of Sub Area	Location of boundary	Strength of boundary	Comments/ possible changes to boundary	Change number
E19	West - operating railway track East - Borough administrative boundary	IE OE	S S	No change	
E20	Lee Valley Forge along operating railway track	IE	S	No change	
E21	Various properties in open green area along Borough administrative boundary	OE	S	No change	
E22	Field along operating railway track	IE	S	No change	
E23	Field with paths & trees West - operating railway track East - Borough administrative boundary	IE OE	S S	No change	
E24	Lee Valley Recreational Park West - operating railway track East - Borough administrative boundary	IE OE	S S	No change	
E25	North - part of Lee Valley Recreational Park with paths, parking & Turnford Brook with boundary along the rear gardens of homes off Benedictine Gate and Mortimer Gate South - part of Lee Valley Recreational Park, The Nightley Recreation Ground with west boundary along the rear gardens of homes off Wavell Close East edge along operating railway track	IE  IE  WGB	W W IE  -	No change	
E26	School with west boundary along the rear gardens of homes off Elm Drive East edge along operating railway track	IE  WGB	W -	No change	
E27	West - operating railway track East - Borough administrative boundary	IE OE	S	No change	
E28	West - operating railway track East - Borough administrative boundary South- rear of properties off Bryanstone Road & Eleanor Way and then follows Station Road		S S W	No change, there is no further opportunity to provide a stronger boundary	

## Appendix 5: Constraints and Opportunities

Table 1 - Option 1 Alterations

Constraints	Sub Area	Comments	Sustainable Development Opportunities						Suggested policy approach
			Comments	Analysis	Comments	Analysis	Comments	Analysis	
A2		0 5 0 4 0 0 Flooding – Zone 1.	Archaeology – Contains Open Spaces – No Open Spaces. Landscape Character – Moderate. Nature Designations – None.	Public Transport – within 400m of a bus stop/station and further than 1500m from train station. Distance to Town/District Centres – Centres – within 800m. Brownfield Land – Some buildings Boundary realignment; proposed alteration specifically intended to strengthen boundary.	Landscape character and archaeology could constrain built development. Consider protection under landscape designation.				Landscape/countryside/ open space protection policy
A5		0 2 5 4 0 0 Flooding – Zone 1.	Archaeology – Within 500m Archaeological Area of Interest. Open Spaces – Contains Open Spaces. Landscape Character – None. Nature Designations – None.	Public Transport – within 400m of a bus stop/station and further than 1500m from train station. Distance to Town/District Centres – Centres – within 800m. Brownfield Land or Boundary realignment; loss of sub the site is n a reasonably given character of land.	Landscape character and community open space could constrain built development along with lack of PDL. The site is not a priority for development, consider protection under landscape designation.				Landscape/countryside/ open space protection policy
A6		0 2 0 0 0 0 Flooding – Zone 1.	Archaeology – Within 500m Archaeological Area of Interest. Open Spaces – No Open Spaces. Landscape Character – None (Urban?). Nature Designations – None.	Public Transport – within 400m of a bus stop/station and further than 1500m from train station. Distance to Town/District Centres – within 1500m of Huddlesdon Town Centre. Distance to Neighbourhood Centres – within 800m. Brownfield Land – School buildings <1 Ha. No Derelict/Vacant Land. Boundary realignment; loss of sub areas A5 and A6 would have a neutral impact on strength of boundary as current strong boundary would be replaced by an equally strong boundary-woodland.	Site of an existing school in a highly accessible location, in close proximity to local & district services and presents very few constraints. Potential to enable appropriate development of the school, as required.				Regeneration potential; although the site is n a reasonably accessible location it contains only a limited amount of brownfield land and no derelict land, and thus does not provide significant regeneration potential overall.

## Appendix 5: Constraints and Opportunities

Table 1 - Option 1 Alterations

Constraints	Sub Area	Comments	Sustainable Development Opportunities					Suggested policy approach
			Analysis	Comments	Comments	Comments	Comments	
A12		0 Flooding – Zone 1. Archaeology – Not within 500m. Open Spaces – No Open Spaces. Landscape Character – None (Urban?). Nature Designations – None.	21	Public Transport – within 400m of a bus stop/station, further than 1500m from train station. Distance to Town/District Centres – within 800m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – within 400m. No Brownfield Land or Derelict/Vacant Land. Regeneration- no real scope for regeneration due to nature of site.	No constraints though as woodland would not be appropriate for development. Consider protection under countryside policies.			Landscape/countryside/open space protection policy
A20		0 Flooding – Zone 3/2/1. Archaeology/SAM Community Open Space Landscape Character Nature Designations	5	0	25 Public Transport – within 400m of a bus stop/station, within 800m of a train station (Broxbourne). Distance to Town/District Centres – within 800m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – within 400m. No Brownfield Land or Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of elevation, or improved use of land in the urban area. Boundary realignment: the release of all but the very north of the site would create a stronger boundary in the form of the distribution road to the north.			Safeguard

## Appendix 5: Constraints and Opportunities

Table 1 - Option 1 Alterations

Constraints	Sub Area	Sustainable Development Opportunities					Suggested policy approach
		Comments	Analysis	Total	Total	Total	
A21		Archaeology - Within 500m of various Listed Buildings, Archaeological Area of Interest and Conservation Area (Hoddesdon).  Open Spaces – No Open Spaces. Landscape Character – None (Urban?).  Nature Designations – None.	Site presents the highest level of opportunities across nearly all criteria, main constraint is flooding-potential for built development with flood mitigation policy measures.	5	5	35	Safeguard and introduce Green Belt schools policy.
B12		Archaeology - Within 500m of Archaeological Area of Interest and Listed Building.  Open Spaces – Contains Cheshunt Park (> Ha). Landscape Character – Moderate/Strong. Nature Designations – None.	Distance to Town/District Centres – Within 400m of a bus stop/station, within 800m of a train station (Broxbourne).  Distance to Neighbourhood Centres – within 400m, Brownfield Land - > 1 Ha school buildings. No Derelict/Vacant Land.	5	5	0	Landscape/ countryside/ open space protection policy
			Regeneration potential: Distance to neighbourhood centres – within 400m of a bus stop/station, within 800m of a train station (Broxbourne).  Regeneration – schools land and buildings. Boundary realignment: release would bring a stronger boundary in the form of a distributor road and tree line.	5	5	0	Highly constrained site in terms of landscape quality and nature conservation. Release of this small section of the sub area would bring benefits in terms of a strengthened boundary with minimal loss of Green Belt land.
			Public Transport – within 400m of a bus stop/station and further than 1500m from train station.	5	0	0	Distance to Town/District Centres – Within 1500m of District Centre (Cheshunt Old Pond).
			Distance to Neighbourhood Centres – within 400m. No Brownfield Land or Derelict/Vacant Land.	5	0	0	Boundary realignment: removal of a very small section would bring an improvement of the strength of the Green Belt boundary to the south (note that any further loss would create an even weaker boundary, however).
			Regeneration potential low as, although located close to the central portion of the urban area of Broxbourne, it has no brownfield/derelict land.	5	0	0	

## Appendix 5: Constraints and Opportunities

**Table 1 - Option 1 Alterations**

Constraints	Sustainable Development Opportunities	Comments		Analysis		Suggested policy approach
		Comments	Analysis	Comments	Analysis	
Sub Area	Public Transport - Bus Stop near residential centre	Distance to services - town centre to services/district neighbourhood centre	Distance to services - district neighbourhood centre	Total Brownefield Land	Brownefield Regeneration	Landscape/ open space protection policy
	Public Transport - Train Station	Distance to services - district neighbourhood centre	Distance to services - town centre to services/district neighbourhood centre	Total Derelict/Vacant Land	Derelict/Vacant Land Regeneration	Poor accessibility and lack of regeneration potential mean that this site may not be a priority for development. Currently provides a green link from the built up area to the open Green Belt.
	Floodplain	Archaeology/SAMM	Archaeology Open Space	Total Nature Designations	Nature Designations	Distance to Town/District Centres - Within 3000m of Cuffley Town Centre.
	Southern enclosed area	C1 (thin strip between Nightingale Road and Dahlia close)	Archaeology – Nothing within 500m.	Total Brownefield Developed Land	Brownefield Developed Land	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).
	C19 (southern enclosed area)	Flooding – Zone 1.	Archaeology – Nothing within 500m of Archaeological Area of Interest and Listed Building.	Total Brownefield Vacant Land	Brownefield Vacant Land Regeneration	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).
		Open Spaces – No Open Spaces.	Open Spaces – Claremont Park (>1Ha).	Total Derelict/Vacant Land	Derelict/Vacant Land Regeneration	Distance to Town/District Centres - Within 3000m of Cuffley Town Centre.
		Landscape Character – None (Urban?).	Landscape Character – None (Urban?).	Total		Distance to Neighbourhood Centres – Further than 800m. No Brownfield Land or Derelict/Vacant Land.
		Nature Designations – None.	Nature Designations – None.			Boundary realignment: boundary is currently weak at this point, with a border against existing properties to the west.
						Boundary realignment: no opportunities to strengthen boundary before the site enters open green belt, unless the current tree cover to the north is strengthened..
						Regeneration potential - low due to absence of brownfield/derelict land (and poor access to services)
						The site has a high community open space value and presents few sustainable development opportunities. Consider protection under landscape designation.
						Regeneration potential - low due to lack of previously developed/derelict land, poor accessibility and open space designation.

## **Appendix 5: Constraints and Opportunities**

**Table 1 - Option 1 Alterations**

## Appendix 5: Constraints and Opportunities

Table 1 - Option 1 Alterations

Constraints	Sustainable Development Opportunities	Comments					Analysis	Suggested policy approach
		Total	Regeneration Potential	Boundary Regeneration	Brownfield Vacant Land	Brownfield Developed Land		
C32	Public Transport - Bus Station	5	3	3	3	3	5	22 Public Transport – within 400m of a bus stop/station, within 1500m of train station (Cuffley). Distance to Town/District Centres – Within 1500m of Cuffley, Town Centre. Distance to Neighbourhood Centres – within 800m. Brownfield Land - <1 Ha school buildings. No Derelict/Vacant Land.
	Distance to Services - Town centre/district							Boundary realignment: a weak boundary would be replaced by an equally weak boundary. Regeneration - potential to facilitate appropriate development of a school.
	Neighbourhood Centre							Public Transport – within 400m of a bus stop/station, within 1500m of train station (Cuffley).
	Previously Developed Land							Distance to Town/District Centres – Within 1500m of Cuffley Town Centre. Distance to Neighbourhood Centres – within 400m. Brownfield Land - <1 Ha Allotment buildings. No Derelict/Vacant Land.
	Brownfield Land - Land							Realignment: removal would deliver a stronger boundary- tree line to west. Regeneration - likely to be restricted by use as allotments.
	Derelict/Vacant Land							
	Boundary Regeneration							
	Regeneration Potential							
	Total	5	0	0	5	22	Relatively unconstrained and good accessibility. Potential to enable appropriate development of the school, as required.	Safeguard and introduce Green Belt schools policy.

## Appendix 5: Constraints and Opportunities

Table 1 - Option 1 Alterations

Constraints	Sub Area	Comments	Sustainable Development Opportunities					Suggested policy approach
			Public Transport - Bus Stop	Public Transport - Train Station	Distance to Services - Town Centre	Distance to Services - Residential District	Public Transport - Bus Stop	
D6	0 2 0	Flooding - Zone 1.	Archaeology – Within 500m of SAM (half moat manor house, moated site and associated leat, Cheshunt), various Listed Buildings, Conservation Areas, Archaeological Area of Interest.	Open Spaces – No Open Spaces	Landscape Character – None (Urban?)	Nature Designations – Local Wildlife Site - Bonney Grove Wood by B198.	Distance to Neighbourhood Centres – within 400m. Brownfield Land ->1 Ha school buildings. No Derelict/Vacant land.	Safeguard and introduce Green Belt schools policy.
D6	0 2 0 3	Flooding – Zone 1.	Archaeology – Within 500m of SAM (half moat manor house, moated site and associated leat, Cheshunt), various Listed Buildings, Conservation Areas, Archaeological Area of Interest.	Open Spaces – No Open Spaces	Landscape Character – None (Urban?)	Nature Designations – Local Wildlife Site - Bonney Grove Wood by B198.	Distance to Town/District Centres – within 1500m of Cheshunt District Centre and 3000m of Waltham Cross Town Centre.	Re-generate/re-use Brownfield Land potential. Protect using appropriate nature conservation and Green Belt Schools policy.
D7	0 2 0 0 0	Flooding – Zone 1.	Archaeology – Within 500m of SAM (half moat manor house, moated site and associated leat, Cheshunt), various Listed Buildings, Conservation Areas, Archaeological Area of Interest.	Open Spaces – No Open Spaces	Landscape Character – None (Urban?)	Nature Designations - None	Distance to Neighbourhood Centres – within 400m. No Brownfield Land or Derelict/Vacant Land. Allotments occupy the land.	Regenerate Brownfield Land ->1 Ha school buildings. No Derelict/Vacant land.
D7	0 2 0 0 0	Flooding – Zone 1.	Archaeology – Within 500m of SAM (half moat manor house, moated site and associated leat, Cheshunt), various Listed Buildings, Conservation Areas, Archaeological Area of Interest.	Open Spaces – No Open Spaces	Landscape Character – None (Urban?)	Nature Designations - None	Distance to Town/District Centres – within 1500m of Cheshunt District Centre and 3000m of Waltham Cross Town Centre.	Regenerate brownfield land and introduce a Green Belt schools policy.

## Appendix 5: Constraints and Opportunities

Table 1 - Option 1 Alterations

Constraints	Sub Area	Comments	Sustainable Development Opportunities					Suggested policy approach
			Total	Regeneration Potential	Boundary Regeneration	Brownfield Land	Previously Developed Land	
D8		Flooding – ZONE 3/2/1. Archaeology - Contains area of Archaeological Interest, Conservation Area (Churchgate), SAM (half moat manor house, moated site and associated leat, Chestnut). Within 500m of various Listed Buildings, Conservation Areas.	5	1	3	5	5	0
D12		Open Spaces – Contains Goffs Lane Park (>1Ha) Landscape Character – None (Urban?) Nature Designations - None	5	1	1	3	5	0
		Flooding Archaeology/SAM	0	2	0	4	0	6
		Community Open Space	5	5	0	4	0	6
		Landscape Character	5	0	0	4	0	6
		Nature Designations	0	0	0	0	0	0
		Public Transport - Bus Station	5	1	3	5	0	20
		Public Transport - Train Station	5	1	3	5	0	20
		Distance to Services - Town Centres to Services	5	1	3	5	0	20
		Neighbourhood Centre - Distance to Services	5	1	3	5	0	20
		Brownfield Land - Previous Developments	5	1	3	5	0	20
		Brownfield Land - Derelict/Vacant Land	5	1	3	5	0	20
		Boundary Regeneration	5	1	3	5	0	20
		Total	5	1	3	5	0	20
		Comments						
		Public Transport – within 400m of a community open space constraint means this site may not be a priority for development.						
		Distance to Town/District Centres – within 1500m of Chestnut District Centre and 3000m of Waltham Cross Town Centre.						
		Distance to Neighbourhood Centres - within 400m. Brownfield Land - >1 Ha school buildings. No Derelict/Vacant Land.						
		Boundary - removal along with D6 Regeneration - low potential due to designation.						
		Public Transport – within 400m of a bus stop/station and further than 1500m from train station.						
		Landscape character, allotments use landscape/ & lack of PDL (other than cemetery) countryside/ open space development opportunities. Consider protection under allotments policy/ landscape designation.						
		Distance to Town/District Centres – Within 3000m of District Centre (Chestnut Old Pond), within 3000m of Waltham Cross Town Centre. Distance to Neighbourhood Centres - within 800m. Brownfield land - cemetery (previously developed). Regeneration - no scope for regeneration given its current use, or for improved use of land in the urban area.						



## **Appendix 5: Constraints and Opportunities**

### **Table 2 - Poorly Performing Sub Areas**

**Table 2 - Poorly Performing Sub Areas**

**Appendix 5: Constraints and Opportunities**

**Table 2 - Poorly Performing Sub Areas**

Constraints	Sub Area	Sustainable Development Opportunities										Comments	Analysis	Suggested policy approach
		Total	Precious Land	Brownfield Land	Derelict Land	Boundary Vacant Land	Regeneration Potential	Public Transport - Train Station	Public Transport - Bus Stop	Distance to Services	Neighbourhood Centre	Previous Development		
C17 (eastern enclosed area)	5 0 3 0 0 8	Flooding – Zone 3/2/1, small area to the Northern edge.	Archaeology – Nothing within 500m.	Open Spaces – Rosedale Open Space (<1Ha). Landscape Character – None (Urban?).	Nature Designations – None.			Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).					The site is highly constrained by flooding and is an area of community open space, it also presents few development opportunities. Consider protection under landscape designation and regeneration potential.	Landscape/ country-side/ open space protection policy
C20 (eastern enclosed area)	0 2 0 0 0 2	Flooding – Zone 1.	Archaeology – Within 500m of Archaeological Area of Interest and Listed Building.	Open Spaces – No Open Spaces.	Landscape Character – None (Urban?).	Nature Designations – None.		Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).					The site has very few constraints and a number of opportunities including accessibility, proximity to neighbourhood centre and P.D.L. Not a priority for development due to no vacant or derelict land.	Safeguard

## **Appendix 5: Constraints and Opportunities**

Table 3 - Option 2 Alterations

Table 3 - Option 2 Alterations

**Appendix 5: Constraints and Opportunities**  
**Table 3 - Option 2 Alterations**

Constraints	Sub Area	Sustainable Development Opportunities					Comments	Suggested policy approach
		Total	Regeneration Potential	Brownfield Realignment	Brownfield Land - Derelict/Vacant Land	Brownfield Land - Previously Developed Land		
A12	Flooding	0	0	0	0	0	Flooding – Zone 1.	Archaeology – Not within 500m.  Open Spaces – No Open Spaces. Landscape Character – None (Urban?). Nature Designations – None.
A13	SUB AREA	5	0	4	0	9	Flooding – Zone 3/2/1.	Archaeology – Not within 500m.  Open Spaces – No Open Spaces. Landscape Character – Moderate/Strong. Nature Designations – None.
		5	1	5	0	5	21	Public Transport – within 400m of a bus stop/station, further than 1500m from train station.
								Distance to Town/District Centres – within 800m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – within 400m. No Brownfield Land or Derelict/Vacant Land. Regeneration- no real scope for regeneration due to nature of site.
								Release would result in a weaker boundary, unless carried out as part of an option 2 release.
							25	Public Transport – within 400m of a bus stop/station and further than 1500m from train station.
								Distance to Town/District Centres – within 1500m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – within 800m. Brownfield Land – Housing <1 Ha. No Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.
								Release would result in a stronger boundary, given weakness of current boundary, especially as an Option 2 release..
								Landscape character could restrict built development opportunities. Consider protection under landscape designation, and flood risk policies.

**Appendix 5: Constraints and Opportunities**  
**Table 3 - Option 2 Alterations**

Constraints	Sustainable Development Opportunities						Comments	Suggested policy approach
	Total	Regeneration Potential	Boundary Realignment	Brownfield Land - Derelict/Vacant Land	Brownfield Land - Previously Developed Land	Distance to Services - town centre/district station		
A15 (Eastern Part)	0 2 0 3 0	Flooding – Zone 1.	3 1 5 0	Archaeology – Within 500m of Listed Buildings.  Open Spaces – No Open Spaces.  Landscape Character – Moderate/Moderate.	Nature Designations – None.	Public Transport - Bus	Although it is relatively unconstrained, its average performance against the Green Belt purposes means that it is not a priority for development.	Safeguard.
C31 (Land between C33 and C34)	0 0 0 0 0	Flooding – Zone 1.	5 3 3 5 0	Archaeology – Not within 500m.  Open Spaces – No Open Spaces  Landscape Character – None (Urban?)	Nature Designations - None	Public Transport - Train	Distance to Town/District Centres – within 800m of Hoddesdon Town Centre.  Distance to Neighbourhood Centres – further than 800m.  Brownfield Land – Buildings <1 Ha. No Derelict/Vacant Land.  Boundary - removal of this area would provide a stronger boundary, in the form of a thick tree line.	Distance to Town/District Centres – within 800m of Hoddesdon Town Centre.  Distance to Neighbourhood Centres – further than 800m.  Brownfield Land – Buildings <1 Ha. No Derelict/Vacant Land.  Boundary - removal of this area would provide a stronger boundary, in the form of a thick tree line.
						Public Transport - Bus	Regeneration - Low potential given its location, and lack of brownfield land, though its proximity to services is noted.	Lack of constraints and good accessibility means that this site would be worth allocating. However, given poor regeneration potential, this site may not be considered to be a priority for development.
						Public Transport - Train	Distance to Town/District Centres – Within 1500m of Cuffley Town Centre.  Distance to Neighbourhood Centres – within 400m.  No Brownfield Land or Derelict/Vacant Land.  Boundary: proposed Option 2 release	Distance to Town/District Centres – Within 400m of a bus stop/station, within 1500m of train station (Cuffley).

**Appendix 5: Constraints and Opportunities**  
**Table 3 - Option 2 Alterations**

Constraints	Sub Area	Sustainable Development Opportunities						Comments	Analysis	Suggested policy approach	
		Total	Brownfield Land - Derelict/Vacant Land	Brownfield Land - Previously Developed Land	Distance to Services - town centre/district station	Distance to Neighbourhood Centre	Public Transport - Bus				
C32	Flooding	0 0 0 0 0 0	Archaeology – Not within 500m.	Open Spaces – No Open Spaces	Landscape Character – Poor/Moderate Only covers the Western edge of the sub-area, the larger portion is not covered as a character area)	Nature Designations - None	5 3 3 3 3 3	Flooding – Zone 1.	Distance to Town/District Centres – Within 1500m of Cuffley Town Centre. Distance to Neighbourhood Centres – within 800m. Brownfield Land - <1 Ha school buildings. No Derelict/Vacant Land.	Relatively unconstrained and good accessibility. Potential to enable appropriate development of the school, as required.	Safeguard and introduce Green Belt schools policy.
C33	Sub Area	0 0 0 0 0 0	Archaeology – Not within 500m.	Open Spaces – No Open Spaces	Landscape Character – None (Urban?)	Nature Designations - None	5 3 3 5 0 0	Flooding – Zone 1.	Distance to Town/District Centres – Within 1500m of Cuffley Town Centre. Distance to Neighbourhood Centres – within 400m. Brownfield Land - <1 Ha Allotment buildings. No Derelict/Vacant Land.	Low constraints and strong sustainability opportunities, though development is likely to be constrained by allotments use.	Landscape/countryside/ open space protection policy

## **Appendix 5: Constraints and Opportunities**

Table 3 - Option 2 Alterations

Table 3 - Option 2 Alterations

Sustainable Development Opportunities		Comments		Analysis		Suggested policy approach	
Constraints	Sub Area	Total	Regeneration Potential	Boundary Regeneration	Comments	Safeguard.	
	C34	5	3	3	3	0	0
Flooding		0	0	0	0	Archaeology – Not within 500m.	
Archaeology		0	0	0	0	Open Spaces – No Open Spaces	
Community Open Space		0	0	0	0	Landscape Character – None (Urban?)	
Landscapes Character		0	0	0	0	Nature Designations - None	
Nature Designations		0	0	0	0	Flooding – Zone 1.	
Archaeology/SAM	D1	0	2	0	0	Archaeology – Within 500m of SAM, Listed Buildings and Archaeological Area of Interest.	
Community Open Space		5	3	1	5	Open Spaces – No Open Spaces	
Landscape Character		5	3	0	0	Landscape Character – None (Urban?)	
Nature Designations		5	22	22	22	Nature Designations - None	
Total		5	3	0	0	Public Transport – Bus stop/station, within 500m of a bus stop/station and within 1500m of a Train Station (Cuffley).	
Public Transport - Bus Stop/station		5	3	3	3	Distance to Town/District Centres – Within 1500m of Cuffley Town Centre.	
Public Transport - Train Station		5	3	3	3	Distance to Neighbourhood Centres – within 800m.	
Previous Land Use		5	3	3	3	Brownfield Land <1 Ha buildings.	
Previous Land Use		5	?	5	0	Hard to say if Derelict/Vacant Land.	
Derelict/Vacant Land		5	0	0	0	Boundary: proposed Option 2 release	
Derelict/Vacant Land		5	0	0	0	Regeneration - despite high score relating to other sustainability indicators, location next to two less well-performing sub areas (C31 and C33) regeneration potential may still be low.	
Total		5	0	0	0	Distance to Town/District Centres – Within 3000m of Waltham Cross Town Centre.	
Regeneration Potential		5	0	0	0	Distance to Neighbourhood Centres – within 400m.	
Boundary Regeneration		5	0	0	0	Brownfield Land <1 Ha buildings.	
Comments		5	0	0	0	No Derelict/Vacant Land.	
		5	0	0	0	Boundary: removal would have a neutral impact on the strength of the boundary, replacing the existing (broadly) strong one with another.	
		5	0	0	0	Regeneration - low constraints, reasonable accessibility and some unoccupied land means that this site is of some regeneration potential.	

**Appendix 5: Constraints and Opportunities**  
**Table 3 - Option 2 Alterations**

Constraints	Sustainable Development Opportunities										Comments	Suggested policy approach										
	Public Transport - Bus			Public Transport - Train			Town centre/district station			Neighbourhood centres												
Sub Area	Flooding	Archaeology/SAM	Community Open Space	Landscape Character	Nature Designations	Total	Brownfield Land - Land	Perviousiy Developed Land	Distance to services - town centre/district	Distance to services - neighbourhood centre	Distance to services - local	Total	Regeneration potential	Brownfield Realignment	Derelict/Vacant Land -	Previously Developed Land -	Neighbourhood Centre	Distance to services -	Distance to services -	Distance to services -	Total	Comments
D14	0	2	0	4	0	6	Flooding – Zone 1.	5	1	1	3	0	0	15	Public Transport – within 400m of a bus stop/station and further than 1500m from train station.	Landscape character and lack of PDL could restrict built development opportunities. Consider protection under landscape designation. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Landscapes/countryside/open space protection policy					
D15	5	5	0	4	3	17	Flooding – Zone 3/2/1.	5	5	5	5	0	0	25	Public Transport – within 400m of a bus stop/station and within 800m of a Train Station (Theobald's Grove).	Site is highly accessible & in close proximity to local & district services but constrained by high flood risk, archaeological interest, landscape character and nature conservation designation. Consider protection under landscape and nature conservation policies.	Landscapes/countryside/open space protection policy					

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Comments	Analysis	Suggested policy approach						
		Total	Regeneration Potential	Brownfield Vacant Land	Brownfield Previously Developed Land	District to Services	Town centre/district	Neighbourhood centres	Previously Developed Land	Brownfield Land	Derelict/Vacant Land									
A14		10	Flooding – Zone 3/2/1.	5	1	5	3	0	0	5	0	19	Public Transport – within 400m of a bus stop/station and further than 1500m from train station.  Distance to Town/District Centres – within 800m of Hoddesdon Town Centre.  Distance to Neighbourhood Centres – within 800m. No Brownfield Land or Derelict/Vacant Land.  Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.	Less constrained though landscape still and flood risk still issues, which could be addressed under flood risk and landscape policies. Moderate achievement against opportunities means it may not be a priority for built development. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Safeguard					
A15 (Whole Area)		5	2	0	3	0	3	0	5	1	5	0	3	0	5	0	17	Public Transport – within 800m of a bus stop/station and further than 1500m from train station.  Distance to Town/District Centres – within 800m of Hoddesdon Town Centre.  Distance to Neighbourhood Centres – further than 800m.  Brownfield Land – Buildings <1 Ha. No Derelict/Vacant Land.  Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.	Relatively unconstrained. Moderate achievement against opportunities means it may not be a priority for built development. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Safeguard

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Analysis	Suggested policy approach		
		Comments					Comments								
A16	Flooding	0	5	0	3	0	8	Flooding – Zone 1.	Archaeology – Contains Conservation Areas (Hoddesdon) and Listed Building.	Open Spaces – No Open Spaces.	Landscape Character – Moderate/Moderate.	Nature Designations – None.	Total Regeneration Potential Brownfield Land - Derelict/Vacant Land Previously Developed Land - town centres to services - neighbourhood centres - town centre/district stations Public Transport - Train Public Transport - Bus	Relatively unconstrained, though conservation area & listed building pose the highest constraint. Some opportunities i.e proximity to district centre & PDL although not a priority for built development	Safeguard
A17	Archaeology/SAM	5	2	0	3	3	13	Flooding – Zone 3/2/1.	Archaeology – Within 500m of Conservation Areas (Hoddesdon), Archaeological Area of Interest, Listed Buildings and SAM.	Open Spaces – No Open Spaces.	Landscape Character – Moderate/Moderate.	Nature Designations – Local Wildlife Site - Lodge Hollow and Spital Brook, Knowle Thicket by Cock Lane Ford.	Distance to Town/District Centres – within 800m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – further than 800m. Brownfield Land – Buildings >1 Ha. No Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.	Public Transport – within 800m of a bus stop/station and further than 1500m from train station. Distance to Town/District Centres – within 800m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – further than 800m. Brownfield Land – Buildings >1 Ha. No Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.	Landscape/ countryside/ open space protection policy

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Suggested policy approach
		Analysis			Comments				Total			
A18	Flooding	18	Flooding – Zone 3/2/1.	5	3	5	0	0	5	0	18	Public Transport – within 400m of a bus stop/station, within 1500m of train station (Broxbourne). Distance to Town/District Centres – within 800m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – Greater than 800m. No Brownfield Land or Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.
A19	Archaeology/SAM	0	Flooding – Zone 1.	5	3	5	0	0	3	0	5	Archaeology – Within 500m of various Listed Buildings, Conservation Areas, Archaeological Area of Interest. Open Spaces – No Open Spaces Landscape Character – Moderate/Moderate. Nature Designations – None.
	Public Transport - Train Station											Public Transport – within 400m of a bus stop/station, within 1500m of train station (Broxbourne). Distance to Town/District Centres – within 800m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – Greater than 800m. Brownfield Land – Some buildings <1 Ha, but mostly park/Greenfield. No Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.
	Public Transport - Bus											Safeguard Opportunities outweigh the site constraints, although there are some accessibility constraints. The site has built development potential. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.

## **Appendix 5: Constraints and Opportunities**

**Table 4 - Long Term Areas of Search**

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Analysis	Suggested policy approach	
		Comments					Comments							
B5	0 5 0 4 0	9	Flooding – Zone 1.	5	3	1	5	5	0	5	0	24	Public Transport – within 400m of a bus stop/station and within 1500m of a Train Station (Broxbourne). Distance to Town/District Centres – Within 3000m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – within 400m. Brownfield Land - >1 Ha school buildings. No Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.	The site is highly constrained by archaeology & landscape character value both would restrict built development opportunities. Consider protection under landscape designation.
B6	0 2 5 4 0	11	Flooding – Zone 1.	5	1	1	5	3	0	5	0	20	Public Transport – within 400m of a bus stop/station and further than 1500m from train station. Distance to Town/District Centres – Within 3000m of Hoddesdon Town Centre. Distance to Neighbourhood Centres – within 400m. Brownfield Land - <1 Ha buildings. No Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.	Site of particular importance in terms of open space, landscape character & close to sites of archaeological interest, all could restrict built development opportunities. Consider protection under landscape and community open space designations.

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Analysis	Suggested policy approach		
		Comments					Comments								
B7	0 2 0 4 0	6	Flooding – Zone 1.	5	1	1	5	0	0	5	0	17	Public Transport – within 400m of a bus stop/station and further than 1500m from train station.  Distance to Town/District Centres – Within 3000m of Hoddesdon Town Centre.  Distance to Neighbourhood Centres – within 400m. No Brownfield Land or Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.	Landscape character & proximity to archaeology could restrict built development opportunities. Consider protection under landscape designation.	Landscape/ country-side/ open space protection policy
B8	5 2 0 4 3	14	Flooding – Zone 3/2/1.	5	1	1	5	0	0	5	0	17	Public Transport – within 400m of a bus stop/station and further than 1500m from train station.  Distance to Town/District Centres – Within 3000m of District Centre (Cheshunt Old Pond), within 3000m of Hoddesdon Town Centre.  Distance to Neighbourhood Centres – within 400m. No Brownfield Land or Derelict/Vacant Land. Regeneration - no scope for regeneration in terms of dereliction, or improved use of land in the urban area.	Landscape character could restrict built development opportunities. Consider protection under landscape designation as well as flood risk policies.	Landscape/ country-side/ open space protection policy

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Suggested policy approach	
		Comments			Analysis			Comments					
C1 (both sides of C10 and adjoining the built-up residential area)		0	2	5	3	0	10	Flooding – Zone 1.	Relatively unconstrained but designation as open space means that appropriate policies should be put in place to ensure its protection for that use if removed from the Green Belt.	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).	Regeneration potential	Landscape/ open space protection policy	
								Archaeology – Contains Archaeological Area of Interest. Within 500m of Listed Building.	Distance to Town/District Centres – Within 3000m of Cuffley Town Centre.	Distance to Neighbourhood Centres – Further than 800m. No Brownfield Land or Derelict/Vacant Land.	Regeneration - scope for better use of land between two urban areas	Total	
								Open Spaces – Hammond Street Park (>1Ha)					
								Landscape Character – Moderate/Moderate.					
C10		0	2	0	3	0	5	Flooding – Zone 1.	Relatively unconstrained and a derelict brownfield site means this should be considered a possibility for development. However, poor accessibility means that this may not be considered a priority development site.	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).	Regeneration potential	Safeguard	
								Archaeology – Contains Archaeological Area of Interest. Within 500m of Listed Building.	Distance to Town/District Centres – Within 3000m of Cuffley Town Centre.	Distance to Neighbourhood Centres – Further than 800m.			
								Open Spaces – No Open Spaces.					
								Landscape Character – Western part Moderate/Moderate. Though mostly has no classification.	Brownfield Land - >1 Ha Nursery buildings. Could be Derelict/Vacant Land.	Regeneration - scope for better use of derelict land			
								Nature Designations – None					

## **Appendix 5: Constraints and Opportunities**

**Table 4 - Long Term Areas of Search**

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities					Comments	Analysis	Suggested policy approach
		Total	Regeneration Potential	Brownfield Vacant Land	Previously Developed Land	Derelict/Vacant Land			
C13	Flooding	0 5 0 3 3	11	Flooding – Zone 1.	Archaeology – Contains Listed Building and within 500m of Archaeological Area of Interest Open Spaces – No Open Spaces. Landscape Character – Moderate/Moderate.	Nature Designations – Local Wildlife Sites - Meadow W. of Whitehouse Farm and Longmead - Status under review.	Public Transport – within 400m of a bus stop/station and within than 1500m of a Train Station (Cuffley). Distance to Town/District Centres – Within 3000m of Cuffley Town Centre.  Distance to Neighbourhood Centres – within 400m. Brownfield Land - >1 Ha buildings. No Derelict/Vacant Land.	The sites archaeological features landscape character and nature designations could restrict built development opportunities. Consider protection under landscape designation.	Landscape/ countryside/ open space protection policy
C14	Archaeology/SAM	0 2 0 3 0	5	Flooding – Zone 1.	Archaeology – Within 500m of Listed Building. Open Spaces – No Open Spaces.  Landscape Character – Moderate/Moderate.	Nature Designations – None.	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley). Distance to Town/District Centres – Within 3000m of Cuffley Town Centre.  Distance to Neighbourhood Centres – further than 800m.  Brownfield Land - <1 Ha buildings. No Derelict/Vacant Land.	The site has few constraints and proximity to local services. For this reason the site is not a priority for development. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Safeguard

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities					Analysis	Suggested policy approach		
		Comments	Public Transport - Train Station	Distance to services - town centre/district	neighbourhood centre	Previously Developed Land - Brownfield Land	Brownfield Land - Derelict/Vacant Land	Boundary Realignment	Regeneration Potential	Total
C15		2 Flooding – Zone 1.	5	1	0	5	0	5	22	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).  Distance to Town/District Centres – Within 3000m of Cuffley Town Centre. Distance to Neighbourhood Centres – further than 800m.  Brownfield Land - >1 Ha buildings. No Derelict/Vacant Land.
C16		3 Flooding – Zone 1.	5	1	0	0	0	5	22	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).  Distance to Town/District Centres – Within 3000m of Cuffley Town Centre. Distance to Neighbourhood Centres – further than 800m.  Brownfield Land - >1 Ha buildings. No Derelict/Vacant Land.  Regeneration - Potential to make better use of derelict land in a broadly urban area.

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Suggested policy approach
		Analysis			Comments				Total			
C17	Flooding	13	Flooding – Zone 3/2/1.	5	1	1	3	0	5	0	15	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley). Distance to Town/District Centres – Within 3000m of Cuffley Town Centre. Distance to Neighbourhood Centres – within 800m. No Brownfield Land or Derelict/Vacant Land. Regeneration - nature of land may make restrict regeneration potential.
C18	Archaeology/SAM	2	Flooding – Zone 1.	3	1	1	0	0	3	0	5	13 Public Transport – within 800m of a bus stop/station and further than 1500m of a Train Station (Cuffley).
	Nature Designations	0	Archaeology – Within 500m of Listed Building.	5	2	3	3	0	5	0	13	Few constraints would restrict however it is not in close proximity to services & does not present the highest levels of accessibility. Development is not a priority for the site.
	Landscape Character	0	Open Spaces – Rosedale Open Space (<1 Ha), Landscape Character – Moderate/Moderate. Nature Designations – None.	5	1	1	3	0	5	0	13	Distance to Town/District Centres – Within 3000m of Cuffley Town Centre.
	Community Open Space	0	Archaeology – Within 500m of Archaeological Area of Interest and Listed Building.	5	2	3	3	0	5	0	13	Distance to Neighbourhood Centres – further than 800m.
	Agriculture	0	Open Spaces – No Open Spaces.	5	2	3	3	0	5	0	13	Brownfield Land - <1 Ha buildings. No Derelict/Vacant Land.
	Buildings	0	Landscape Character – None (Urban?).	5	2	3	3	0	5	0	13	Regeneration - limited potential given predominantly greenfield nature of land.
	Transport	0	Nature Designations – None.	5	2	3	3	0	5	0	13	

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Suggested policy approach
		Analysis			Comments				Comments			
C19		Comments	10	Flooding – Zone 1.	5	1	1	3	0	5	0	15
		Archaeology –Within 500m of Archaeological Area of Interest and Listed Building.										Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).
		Open Spaces – Claremont Park (>1Ha).										Consider protection under built development opportunities.
		Landscape Character – None (Urban?).										Distance to Town/District Centres – Within 3000m of Cuffley Town Centre.
		Nature Designations – Local Wildlife Sites - Meadow S of Rosedale Sportsground - Status under review.										Community open space and nature designation could restrict built development opportunities.
		Total										Consider protection under community open space and nature conservation designations.
C20		Comments	2	Flooding – Zone 1.	5	1	1	3	3	0	5	18
		Archaeology –Within 500m of Archaeological Area of Interest and Listed Building.										Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).
		Open Spaces – No Open Spaces.										Distance to Town/District Centres – Within 3000m of Cuffley Town Centre.
		Landscape Character – None (Urban?).										Distance to Neighbourhood Centres – within 800m.
		Nature Designations – None.										Brownfield Land or Derelict/Vacant Land.
		Total										Regeneration - limited potential given nature of land.
												Consider allocating site
												The site presents few constraints and it is highly accessible, is reasonably placed in relation to services, & has PDL. The site maybe suitable for built development.

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities					Analysis	Suggested policy approach		
		Comments	Public Transport - Train Station	Public Transport - Bus	Distance to services - town centre/district	Distance to services - neighbourhood centre	Previously Developed Land - Brownfield Land	Derelict/Vacant Land - Brownfield Land	Total	
C21		2 Flooding – Zone 1.	5	1	1	3	0	5	5	25
		Archaeology – Within 500m of Archaeological Area of Interest and Listed Building.								Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).
		Open Spaces – No Open Spaces.								Distance to Town/District Centres – Within 3000m of Cuffley Town Centre.
		Landscape Character – None (Urban?).								Distance to Neighbourhood Centres – within 800m.
		Nature Designations – None.								Brownfield Land - >1 Ha large nursery buildings. No Derelict/Vacant Land.
										Regeneration - potential given derelict and in a broadly urban area.
C22		9 Flooding – Zone 1.	5	1	1	5	5	0	5	27
		Archaeology – Contains Archaeological Area of Interest and Listed Buildings.								Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).
		Open Spaces – No Open Spaces.								Distance to Town/District Centres – Within 3000m of Cuffley Town Centre.
		Landscape Character – Good/Moderate.								Distance to Neighbourhood Centres – within 400m.
		Nature Designations – None.								Brownfield Land - >1 Ha residential housing. No Derelict/Vacant Land.
										Regeneration - potential given brownfield and in a broadly urban area.

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities					Analysis	Suggested policy approach
		Comments	Public Transport - Train	Public Transport - Bus	Distance to services - town centre/district station	Distance to services - neighbourhood centre		
C23		5 Flooding - Zone 1.	5	1	1	3	0	15 Public Transport - within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley). Distance to Town/District Centres – Within 300m of Cuffley Town Centre. Distance to Neighbourhood Centres – within 80m. No Brownfield Land or Derelict/Vacant Land. Regeneration - limited potential given nature of land.
		Archaeology – Within 500m of Archaeological Area of Interest and Listed Building. Open Spaces – No Open Spaces. Landscape Character – None (Urban?). Nature Designations – Local Wildlife Sites - Meadow W of Tudor Villas - Status under review.						
C24		5 Flooding - Zone 1.	5	1	1	5	0	27 Public Transport - within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley). Distance to Town/District Centres – Within 300m of Cuffley Town Centre. Distance to Neighbourhood Centres – within 400m. Brownfield Land ->1 Ha large nursery buildings. No Derelict/Vacant Land. Regeneration - potential given derelict and in a broadly urban area.
		Archaeology – Contains Archaeological Area of Interest and within 500m of Listed Buildings. Open Spaces – No Open Spaces. Landscape Character – None (Urban?). Nature Designations – None.						

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities					Comments	Analysis	Suggested policy approach
		Public Transport - Train Station	Public Transport - Bus	Distance to services - town centre/district centre	Distance to services - neighbourhood centre	Brownfield Land - Previously Developed Land	Brownfield Land - Derelict/Vacant Land	Regeneration Potential	Total
C25		5	1	1	5	3	0	20	Open space value may restrict development & site not priority for development due to low amount of PDL & no vacant brownfield land. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.
		Archaeology – Within 500m of Archaeological Area of Interest and Listed Building.							
		Open Spaces – Goffs Oak Park (>1Ha).							
		Landscape Character – None (Urban?).							
		Nature Designations – None.							
C26		5	3	1	5	5	0	5	Archaeology is a minor site constraint against a number of opportunities including good accessibility, proximity to services, PDL & regeneration potential. On this basis the site maybe suitable for built development.
		Archaeology – Within 500m of Archaeological Area of Interest and Listed Building.							
		Open Spaces – No Open Spaces.							
		Landscape Character – None (Urban?).							
		Nature Designations – None.							

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Suggested policy approach										
		Analysis					Comments															
C27	Flooding	5	0	3	0	5	Flooding – Zone 1.	Archaeology – Within 500m of Archaeological Area of Interest and Listed Building.	Open Spaces – No Open Spaces.	Landscape Character – Moderate/Moderate (only small Part).	Nature Designations – None.	Consider allocating site										
C28	Archaeology/SAM	0	2	0	3	0	5	Flooding – Zone 1.	Archaeology – Within 500m of Archaeological Area of Interest and Listed Building.	Open Spaces – No Open Spaces.	Landscape Character – Moderate/Moderate (only small Part).	Nature Designations – None.	The site presents moderate constraints against a number of highly scoring opportunities including good accessibility, proximity to services, PDL & regeneration potential. On this basis the site maybe suitable for built development.									
	Total	5	1	1	5	5	27	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).	Distance to Town/District Centres – Within 300m of Cuffley Town Centre.	Distance to Neighbourhood Centres – within 400m.	Brownfield Land - Derelict/Vacant Land - Regeneration Potential - Boundary Realignment - Brownfield Land - Previously Developed Land - Regeneration - Distance to services - town centre/district centre - Distance to services - neighbourhood centre - Public Transport - Train Station - Bus Transport - Bus	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).	Distance to Town/District Centres – Within 300m of Cuffley Town Centre.	Distance to Neighbourhood Centres – within 400m.	Brownfield Land - >1 Ha buildings. No Derelict/Vacant Land.	Regeneration - potential given that it contains brownfield land and is in a broadly urban area.	Public Transport – within 400m of a bus stop/station and further than 1500m of a Train Station (Cuffley).	Distance to Town/District Centres – Within 300m of Cuffley Town Centre.	Distance to Neighbourhood Centres – within 400m.	Brownfield Land - <1 Ha buildings. No Derelict/Vacant Land.	Regeneration - limited as it is in a wider, more open area and of limited brownfield land.	Safeguard

## **Appendix 5: Constraints and Opportunities**

**Table 4 - Long Term Areas of Search**

## Appendix 5: Constraints and Opportunities

**Table 4 - Long Term Areas of Search**

Constraints	Sub Area	Sustainable Development Opportunities										Analysis	Suggested policy approach			
		Comments			Comments			Comments								
D15	Flooding	5	0	4	3	17	Flooding – Zone 3/2/1.	5	5	5	0	25	Public Transport – within 400m of a bus stop/station and within 800m of a Train Station (Theobald's Grove). Distance to Town/District Centres – Within 800m of District Centre (Cheshunt Old Pond), within 1500m of Waltham Cross Town Centre.	site is highly accessible & in close proximity to local & district services but constrained by high flood risk, archaeological interest, landscape character and nature conservation designation. Consider protection under landscape and nature conservation policies.		
D15	Archaeology/SAM	5	5	0	4	3	17	Flooding – Zone 3/2/1.	5	5	5	0	25	Public Transport – within 400m of a bus stop/station and within 800m of a Train Station (Theobald's Grove). Distance to Town/District Centres – Within 800m of District Centre (Cheshunt Old Pond), within 1500m of Waltham Cross Town Centre.	site is highly accessible & in close proximity to local & district services but constrained by high flood risk, archaeological interest, landscape character and nature conservation designation. Consider protection under landscape and nature conservation policies.	
D16	Open Spaces	0	5	0	4	0	9	Flooding – Zone 1.	5	3	5	0	0	23	Public Transport – within 400m of a bus stop/station and within 1500m of a Train Station (Theobald's Grove). Distance to Town/District Centres – Within 800m of District Centre (Cheshunt Old Pond), within 1500m of Waltham Cross Town Centre.	site is highly accessible & in close proximity to local & district services but constrained by archaeology interest & quality of landscape. Consider protection under landscape designation. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.
D16	Nature Designations	0	5	0	4	0	9	Flooding – Zone 1.	5	3	5	0	0	23	Public Transport – within 400m of a bus stop/station and within 1500m of a Train Station (Theobald's Grove). Distance to Town/District Centres – Within 800m of District Centre (Cheshunt Old Pond), within 1500m of Waltham Cross Town Centre.	site is highly accessible & in close proximity to local & district services but constrained by archaeology interest & quality of landscape. Consider protection under landscape designation. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.
D16	Landscape Character	0	5	0	4	0	9	Flooding – Zone 1.	5	3	5	0	0	23	Public Transport – within 400m of a bus stop/station and within 1500m of a Train Station (Theobald's Grove). Distance to Town/District Centres – Within 800m of District Centre (Cheshunt Old Pond), within 1500m of Waltham Cross Town Centre.	site is highly accessible & in close proximity to local & district services but constrained by archaeology interest & quality of landscape. Consider protection under landscape designation. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.
D16	Community Open Space	0	5	0	4	0	9	Flooding – Zone 1.	5	3	5	0	0	23	Public Transport – within 400m of a bus stop/station and within 1500m of a Train Station (Theobald's Grove). Distance to Town/District Centres – Within 800m of District Centre (Cheshunt Old Pond), within 1500m of Waltham Cross Town Centre.	site is highly accessible & in close proximity to local & district services but constrained by archaeology interest & quality of landscape. Consider protection under landscape designation. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.
D16	Nature Designations	0	5	0	4	0	9	Flooding – Zone 1.	5	3	5	0	0	23	Public Transport – within 400m of a bus stop/station and within 1500m of a Train Station (Theobald's Grove). Distance to Town/District Centres – Within 800m of District Centre (Cheshunt Old Pond), within 1500m of Waltham Cross Town Centre.	site is highly accessible & in close proximity to local & district services but constrained by archaeology interest & quality of landscape. Consider protection under landscape designation. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.
D16	Sustainable Development Opportunities	0	5	0	4	0	9	Flooding – Zone 1.	5	3	5	0	0	23	Public Transport – within 400m of a bus stop/station and within 1500m of a Train Station (Theobald's Grove). Distance to Town/District Centres – Within 800m of District Centre (Cheshunt Old Pond), within 1500m of Waltham Cross Town Centre.	site is highly accessible & in close proximity to local & district services but constrained by archaeology interest & quality of landscape. Consider protection under landscape designation. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.

## **Appendix 5: Constraints and Opportunities**

**Table 4 - Long Term Areas of Search**

Sustainable Development Opportunities		Constraints		Suggested policy approach	
				Analysis	
				Comments	
Total				site is highly accessible & in close proximity to local & district services but constrained by high flood risk, archaeology interest, open space & quality of landscape. Consider protection under community open space and landscape designations.	Landscape/ countryside/ open space protection policy
Regeneration Potential					
Boundary Realignment					
Brownfield Vacant Land					
Brownfield Land					
Previously Developed Land					
Brownfield Land					
Distance to Services - neighbouringhood Centres - town centre/district station					
Distance to Services - town centres - train station					
Public Transport - Bus					
Public Transport - Train					
Total					
Nature Designations					
Landscape Character					
Community Open Space					
Flooding					
Sub Area					
D17	5	5	0	19 Flooding – Zone 3/2/1.	
				Archaeology – Contains Archaeological Area of Interest, Listed Buildings, SAM. Within 500m of Conservation Area (Churchgate).	
				Open Spaces – Cedars Park (>1Ha).	
				Landscape Character – Good/Moderate.	
				Nature Designations – None.	
D18	5	5	0	14 Flooding – Zone 3/2/1.	
				Archaeology – Contains Archaeological Area of Interest.	
				Open Spaces – No Open Spaces.	
				Landscape Character – Good/Moderate.	
				Nature Designations – None.	

## Appendix 6: Schedule of Proposed Green Belt Changes

Table 1: Option 1 Alterations

Sub area	Proposed alteration	Change number	Suggested Policy Approach
<b>A2</b>	Remove two protrusions on eastern boundary	1.1	Landscape/ countryside/ open space protection policy
<b>A5</b>	Removal of sub areas A5 and A6	1.9	Landscape/ countryside/ open space protection policy
<b>A6</b>	Removal or sub areas A5 and A6	1.1	Safeguard and introduce Schools policy.
<b>A12</b>	Remove sub area.	1.11	Landscape/ countryside/ open space protection policy
<b>A20</b>	Remove sub areas 20 and 21	1.2	Safeguard
<b>A21</b>	Remove sub areas 20 and 21	1.3	Safeguard and introduce Schools policy.
<b>B12</b>	Remove a small strip of Green Belt and move north to stronger tree line	1.4	Landscape/ countryside/ open space protection policy
<b>C1 (part)</b>	Remove the thin strip from Green Belt between Nightingale Road and Dalia Close but keep protective environmental policy for common land. It is difficult to see how land surrounded by development keeps the openness of the Green Belt.	1.5	Landscape/ countryside/ open space protection policy
<b>C19 (part)</b>	Remove rectangular area to the east where it separates two parts of the same urban area	1.12	Landscape/ countryside/ open space protection policy
<b>C20</b>	Remove the triangular piece of land on north side of Andrew's Lane and consider if it could be put to any particular use	1.6	Consider development
<b>C25</b>	Remove PH, move north to field boundary	1.7	Consider development (for areas not covered by open space designation)
<b>C32</b>	Remove sub area.	1.13	Safeguard and introduce Schools policy.
<b>C33</b>	Consider removing from Green Belt, moving the boundary to established hedgerow/trees	1.8	Landscape/ countryside/ open space protection policy
<b>D6</b>	Consider removal of sub areas D6, D7 and D8 in conjunction as they all perform poorly against the Green Belt purposes.	1.14	Safeguard and introduce Schools policy.
<b>D7</b>	Consider removal of sub areas D6, D7 and D8 in conjunction as they all perform poorly against the Green Belt purposes.	1.15	Safeguard and introduce a Schools policy.
<b>D8</b>	Consider removal of sub areas D6, D7 and D8 in conjunction as they all perform poorly against the Green Belt purposes.	1.16	Safeguard and introduce a Schools policy.

<b>Sub area</b>	<b>Proposed alteration</b>	<b>Change number</b>	<b>Suggested Policy Approach</b>
<b>D12</b>	Remove D13 due to poor performance against purposes, and remove D12 to tie in with this release, and create a stronger Green Belt inner boundary using the tree line to the south of the sub area.	1.17	Landscape/ countryside/ open space protection policy
<b>D13</b>	See D12	1.18	Landscape/ countryside/ open space protection policy
<b>E15</b>	Remove sub area	1.19	Landscape/ countryside/ open space protection policy

Table 2: Option 2 Alterations

<b>Sub area</b>	<b>Proposed alteration</b>	<b>Change number</b>	<b>Suggested Policy Approach</b>
<b>A10</b>	Remove sub areas A10, A11 and A13 (along with A12- see option 1 proposed changes above) in order to provide a stronger inner Green Belt boundary in the form of the A10 dual carriageway to the west of A10, the strong tree boundary to the south of A13.	2.1	Landscape/ countryside/ open space protection policy
<b>A11</b>		2.2	Landscape/ countryside/ open space protection policy
<b>A13</b>		2.3	Landscape/ countryside/ open space protection policy
<b>A15</b>	Remove eastern corner of sub area, to create a new, stronger boundary using a thick tree line.	2.4	Safeguard.
<b>C31 (part)</b>	Remove part of C31, C33 and C34 and move boundary to northern edge of woodland and field boundary to edge of woodland and field boundary.	2.5	Safeguard.
<b>C33</b>		2.6	Landscape/ countryside/ open space protection policy
<b>C34</b>		2.7	Safeguard.
<b>D1</b>	Remove to be consistent with other schools that have the potential to provide an equivalent or stronger boundary. Removal would enable a strong inner Green Belt boundary to be retained.	2.8	Safeguard and introduce Schools policy.
<b>D14</b>	Remove D14 and introduce a stronger boundary to the west (Lieutenant Ellis Way).	2.9	Landscape/ countryside/ open space protection policy
<b>D15</b>	Remove part of D15 from Green Bury Way and Waterside Green Chains as this is already allocated in the Local Plan as policy EMP11, move boundary to Lieutenant Ellis Way then keep EMP11 and protection of Broom Hills designations	2.1	Landscape/ countryside/ open space protection policy

## Appendix 7: Long-term Areas of Search

This Appendix sets out further details in terms of possible long-term areas of search discussed in Section 8.3 of the Review. In particular, it provides additional information regarding the implications of any release in terms of the PPG2 Green Belt purposes, and provides some possible policy approaches to any land removed from the Green Belt, informed by an assessment of constraints and sustainable development opportunities.

### A. HODDESDON AREA

Building on the proposed limited release of specific sub areas in Green Belt Area A (see Section 8.2 above), the removal of sub-areas A14 - A22 would enable the creation of an extremely robust, permanent Green Belt inner boundary in the form of the A10 dual carriageway. Also there is a need to decide whether the A10 should be included or excluded from the Green Belt (i.e. included - western edge of A10 would form the new Green Belt boundary or excluded - the eastern edge would form the boundary).

This would mean the additional loss of Green Belt sub areas 14 to 19, and 22. Section 8.2 has also set out recommendations for the removal of sub areas A10 to A13 and A20 and A21. This would entail the release of a large amount of open Green Belt land. Given the nature of much of the land, it is highly recommended that the removed Green Belt land should be almost exclusively be re-designated under environmental protection policies and/or safeguarded land, if released.

	Total site area	Relationship with purposes	Implications for Green Belt	Constraints and Sustainable Development Opportunities	Suggested policy approach
A14	26.39	The high score of these sub areas predominantly relates to their role as a barrier to the open Green Belt and separation of Broxbourne urban area from the small settlement west of Halley Farm.	The A10 dual carriageway also acts as a strong barrier between the Broxbourne urban area and the settlement west of Halley Farm.	Less constrained though landscape still and flood risk still issues, which could be addressed under flood risk and landscape policies, Moderate achievement against opportunities means it may not be a priority for built development. Ensure greenfield sites only taken forward once all brownfield opportunities have been investigated.	Safeguard
A15	18.18		The sub areas could be removed without increased risk to the openness of the Green Belt, or to the separation of distinct settlements due to the strong role of the A10 dual carriageway in achieving both of these aims.	Relatively unconstrained. Moderate achievement against opportunities means it may not be a priority for built development. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Safeguard
A16	5.66	see text above	see text above	Relatively unconstrained, though conservation area & listed building pose the highest constraint. Some opportunities i.e. proximity to district centre & PDL although not a priority for built development.	Safeguard

	Total site area	Relationship with purposes	Implications for Green Belt	Constraints and Sustainable Development Opportunities	Suggested policy approach
A12	2.76	(performs poorly against the Green Belt purposes)		No constraints though as woodland would not be appropriate for development. Consider protection under countryside policies.	Landscape/ countryside/ open space protection policy
A17	66.01	(performs poorly against the Green Belt purposes)		Site highly constrained by flood risk, archaeology & nature conservation - site not suitable for built development consider protection under landscape designation, nature conservation and flooding.	Landscape/ countryside/ open space protection policy
A18	9.89	(performs poorly against the Green Belt purposes)		Although site presents a number of opportunities it is also highly constrained by flood risk, archaeology & open space. Site not suitable for built development, consider protection under landscape designation and open space protection policies.	Landscape/ countryside/ open space protection policy
A19	3.13	(performs poorly against the Green Belt purposes)		Opportunities outweigh the site constraints, although there are some accessibility constraints. The site has built development potential. Ensure greenfield sites are only considered after all brownfield opportunities have been investigated.	Safeguard
A22	4.20	(performs poorly against the Green Belt purposes)		Site is highly accessible, in close proximity to local & district services but constrained by high flood risk & sited within a conservation area- on this basis it may not be a priority for development. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Safeguard
<b>Total hectares</b>	<b>136.22</b>				
Safeguard	57.56				
Consider allocating	0				
Landscape/ environmental/ Community open space designation	78.66				

The removal of these sub areas from the Green Belt would raise a number of issues regarding how the released Green Belt land would be approached by future planning policies, to ensure that the appropriate approach is taken with regard to the protection, safeguarding or, where appropriate, development of sites removed from the Green Belt. A number of the sub areas are of significant landscape quality: appropriate designations and supporting policies should be used to ensure that these sites are protected. Similarly, a number of sub areas are designated as community open space, and as nature conservation areas (local wildlife sites). Appropriate policies could again be introduced to ensure that these sites are given adequate protection: as a result, it is suggested that approximately 79 hectares of land in this area should be protected under landscape, environmental of community open space designations.

A number of sites are relatively unconstrained, and achieve moderate results in relation to opportunities for sustainable development. Although these sites could realistically be taken forward, limitations in terms of accessibility, moderate landscape value or being greenfield sites, mean that these sites are not considered to be priorities for development. It is therefore proposed that the remaining 57.5 hectares of land that could be removed in this area are safeguarded for the time being.

## B. WORMLEY AREA

There is again the opportunity to provide a significantly more robust and permanent Green Belt inner boundary for Broxbourne in the form of the A10 dual carriageway through the release of sub areas B4 to B8. There sub areas are relatively large, and green in nature, and their release would involve the loss of a significant amount of open Green Belt, but would again help to form a more permanent boundary and a more cohesive urban outline for the Borough.

	Total site area	Relationship with purposes	Implications for Green Belt	Constraints and Opportunities	Suggested policy approach
B4	23.13	All of these sites perform strongly against the Green Belt purposes because they separate the large urban area of Broxbourne from the open Green Belt. They are also of medium-high countryside value, most notably sub areas B4 and B8.	Removal of these sub areas from the Green Belt would mean the loss of a significant amount of Green Belt land. However, the A10 arguably provides a more permanent barrier against sprawl into the open Green Belt that would be defensible over the long term. Furthermore, in practice the A10 dual carriageway serves to reduce the value of these sub areas in protecting the open Green Belt from encroachment as the road effectively prevents any land to the east from being 'open', sandwiched between the road and the urban area of Broxbourne.	The site is highly constrained by open space & landscape character value both would restrict built development opportunities. Consider protection under landscape and community open space designations.	Landscape/ countryside/ open space protection policy
B5	<b>13.57</b>			The site is highly constrained by archaeology & landscape character value both would restrict built development opportunities. Consider protection under landscape designation.	Landscape/ countryside/ open space protection policy
B6	<b>14.05</b>			Site of particular importance in terms of open space, landscape character & close to sites of archaeological interest, all could restrict built development opportunities. Consider protection under landscape and community open space designations.	Landscape/ countryside/ open space protection policy
B7	<b>1.39</b>			Landscape character & proximity to archaeology could restrict built development opportunities. Consider protection under landscape designation.	Landscape/ countryside/ open space protection policy
B8	<b>29.40</b>			Landscape character could restrict built development opportunities. Consider protection under landscape designation as well as flood risk policies.	Landscape/ countryside/ open space protection policy
Total hectares	<b>81.45</b>				
Safeguard	<b>0</b>				
Consider allocating	<b>0</b>				
Landscape/ environmental/ Community open space designation	<b>81.45</b>				

This area is of significant community and environmental value, with open space designations and strong landscape character giving the whole area a status that would be likely to prevent any kind of development over the short, medium and long term. Appropriate policies should therefore be put in place to protect this land for these reasons. This would mean that the land is protected under more appropriate planning policies that reflect their wider value to the community and the environment, whilst addressing issues relating to inconsistent strength of the inner Green Belt boundary at this point, and the superior role of the A10 in preventing sprawl over the long term.

## C. HAMMOND STREET, GOFFS OAK AND ROSEDALE AREA (FARMS/FIELDS/NURSERIES SURROUNDING THE ST JAMES'S ROAD RESIDENTIAL AREA)

Figure 5 demonstrates that the majority of land between the large urban area of Broxbourne and the distinct existing settlements within the Borough to the west (i.e. land covered by Green Belt sub areas C11-C30) has extremely flawed boundaries, meaning that there are no real barriers to prevent encroachment between these settlements. Indeed, it is incremental development that has taken place apparently without regard to the integrity of the Green Belt, that has led to the creation of these distinct existing settlements.

An option, therefore, is to transform the Green Belt in this location, in order to create a far stronger boundary around the edge, using existing distributor roads. The Council could therefore consider removing the following sub-areas:

- Part of C1 (both sides of C10 and adjoining the built-up residential area);
- C10 through to 29;
- Part of C30 (nurseries only).

If this land removed from the Green Belt, it is highly recommended that much of the removed Green Belt land is be re-designated under environmental protection policies and/or safeguarded land, unless it can be demonstrated that small pockets of land are needed for development within the plan period. As with all of potential allocations, land released for development must be subject to the Specific Site Allocation Development Plan Document statutory procedures, including a Sustainability Appraisal.

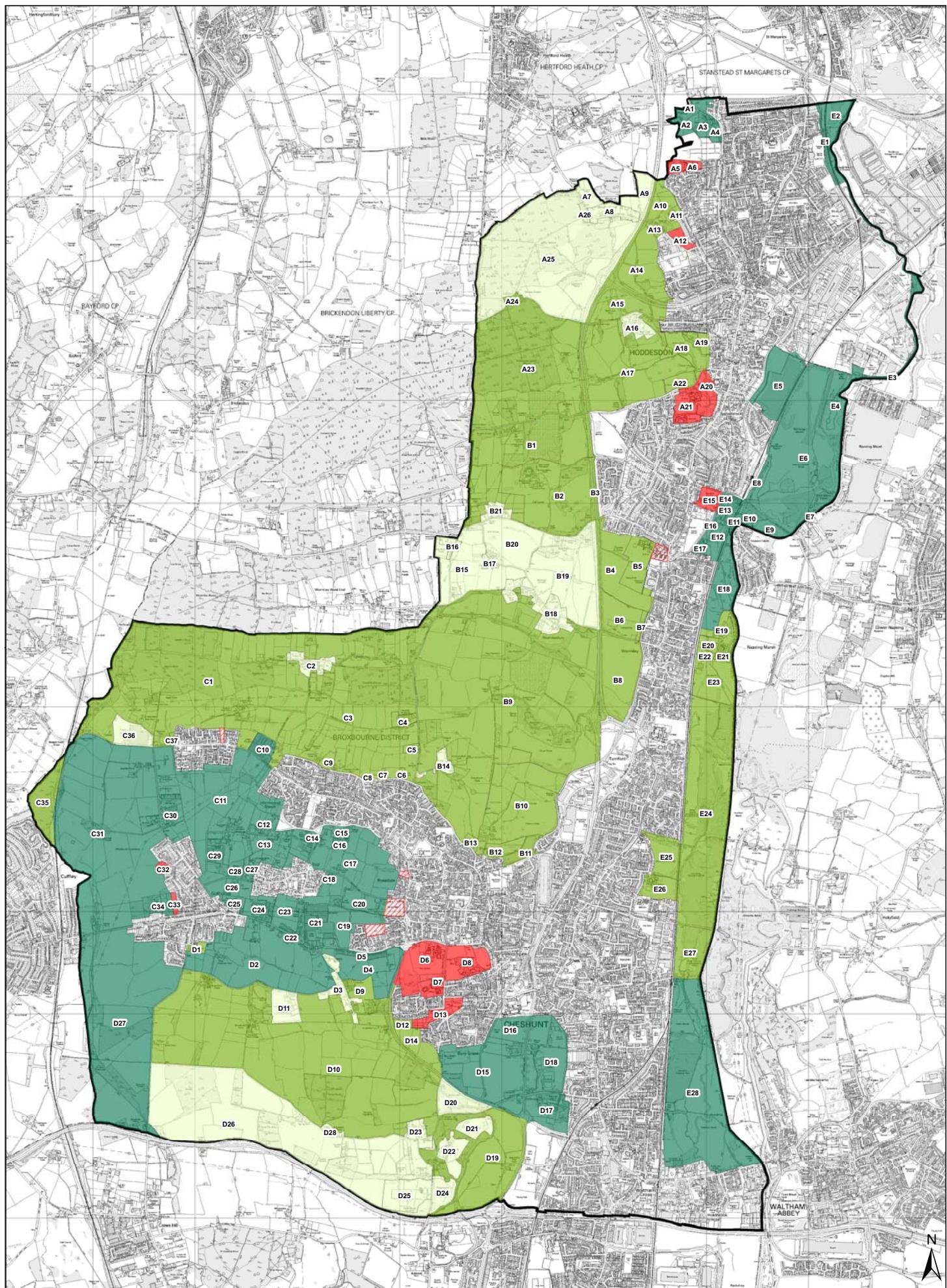
Total site area	Relationship with purposes	Implications for Green Belt	Constraints and Opportunities	Suggested policy approach
C1	0.50	All perform strongly by separating distinct existing settlements.	Relatively unconstrained but designation as open space means that appropriate policies should be put in place to ensure its protection for that use if removed from the Green Belt.	Landscape/ countryside/ open space protection policy
C10	4.91		Relatively unconstrained and a derelict brownfield site means this should be considered a possibility for development. However, poor accessibility means that this may not be considered a priority development site.	Safeguard
C11	73.42		The sites archaeology assets, open space, landscape character & local wildlife sites would restrict built development opportunities. Consider protection under landscape designation.	Landscape/ countryside/ open space protection policy

Total site area	Relationship with purposes	Implications for Green Belt	Constraints and Opportunities	Suggested policy approach
C12 5.53	All perform strongly by separating distinct existing settlements.		The site presents very few constraints and regeneration potential, although accessibility is fairly poor. The site maybe suitable for built development but may not be considered a priority.	Safeguard
C13 31.67			The sites archaeological features, landscape character and nature designations could restrict built development opportunities. Consider protection under landscape designation.	Landscape/ countryside/ open space protection policy
C14 1.19			The site has few constraints and good bus links, but not in close proximity to local services. For this reason the site may not be a priority for development. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Safeguard
C15 3.23			The site is brownfield, has few constraints and good bus links, but not in close proximity to local services. For this reason the site may not be a priority for development.	Safeguard
C16 1.57			The site is brownfield, has few constraints and good bus links, but not in close proximity to local services. For this reason, the site may not be a priority for development.	Safeguard
C17 35.37			The site presents a number of constraints which could restrict built development opportunities, including high flood risk and there is no PDL. Consider protection under community open space and nature conservation designations.	Landscape/ countryside/ open space protection policy
C18 1.13			Few constraints would restrict built development at the site however it is not in close proximity to services & does not present the highest levels of accessibility. Development may not be a priority for the site.	Safeguard
C19 21.14			Community open space and nature designation could restrict built development opportunities. Consider protection under community open space and nature conservation designations.	Landscape/ countryside/ open space protection policy

	Total site area	Relationship with purposes	Implications for Green Belt	Constraints and Opportunities	Suggested policy approach
C20	10.82	All perform strongly by separating distinct existing settlements.		The site presents few constraints and it is highly accessible, is reasonably placed in relation to services, & has PDL. The site maybe suitable for built development.	Consider allocating site
C21	8.90			The site presents very few constraints and a high level of derelict/ vacant brownfield land & regeneration potential. Reasonable proximity to services. The site maybe suitable for built development.	Consider allocating site
C22	12.77			The archaeological & good landscape quality constraints are weighed against a number of opportunities including good accessibility, high level of derelict/ vacant brownfield land & regeneration potential. On this basis the site maybe suitable for built development.	Consider allocating site, subject to appropriate protection under landscape policies.
C23	7.70			Site relatively unconstrained and reasonably well connected, however not priority for development due to local wildlife sites & lack of PDL & vacant land. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Landscape/ countryside/ open space protection policy
C24	7.02			Archaeology is the only site constraint against a number of opportunities including reasonable accessibility and proximity to services, high level of derelict/ vacant brownfield land & regeneration potential. On this basis the site maybe suitable for built development.	Consider allocating site
C25	2.66			Open space value may restrict development & site not priority for development due to low amount of PDL & no vacant brownfield land. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Landscape/ countryside/ open space protection policy
C26	7.25			Archaeology is a minor site constraint against a number of opportunities including good accessibility, proximity to services, PDL & regeneration potential. On this basis the site maybe suitable for built development.	Consider allocating site

	Total site area	Relationship with purposes	Implications for Green Belt	Constraints and Opportunities	Suggested policy approach
C27	3.35	All perform strongly by separating distinct existing settlements.		The site presents moderate constraints against a number of highly scoring opportunities including good accessibility, proximity to services, PDL & regeneration potential. On this basis the site maybe suitable for built development.	Consider allocating site
C28	2.28			Site presents few constraints but may not be a priority for development due to low amount of PDL and location away from existing settlements. Ensure greenfield sites are considered after all brownfield opportunities have been investigated.	Safeguard
C29	2.88			The site presents moderate constraints against a number of highly scoring opportunities including derelict/ vacant land & regeneration potential, though accessibility performance is moderate only. Overall the site maybe suitable for built development.	Consider allocating site
C30	6.98			Unconstrained and reasonably well connected, this site could be considered for release. Its location away from the built up area means that this may not be a priority, although it is a derelict site, and built development may therefore represent good re-use	Safeguard
<b>Total hectares</b>	<b>252.27</b>				
Safeguard	<b>26.82</b>				
Consider allocating	<b>52.99</b>				
Landscape/ environmental/ Community open space designation	<b>172.46</b>				

- 8.1.1 A number of sub areas have characteristics that should be addressed by wider planning policy, if this area was to be released from the green Belt. A number of sub areas contain designated community open space, areas of landscape character and local wildlife sites. Appropriate planning policies should be introduced to give an indicative area of 172 hectares the appropriate protection.
- 8.1.2 Eight sub areas do not characteristics that are likely to merit policy protection, but poor performance in terms of opportunities for sustainable development means that they may not be considered to be priorities for development. For example, a number of sub areas do not contain previously developed land, have poor accessibility to services, or are located away from urban areas. Therefore, an indicative area of 27 hectares could be safeguarded for the time being.
- 8.1.3 It is considered that land within six sub areas (with an indicative area of 53 hectares) may be considered for release for built development, if this area were to be released from the Green Belt. However, this would have to be considered in the context of a long-term consideration of the future strategy for this whole area, which currently suffers from poor defined areas that, in places, merge in to each other as a result of previous urban sprawl.



Legend	
<span style="background-color: darkgreen; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span>	Provides a barrier between two or more distinct existing settlements (Score 5)
<span style="background-color: mediumseagreen; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span>	Provides a barrier between an existing large urban area and open green belt (Score 5)
<span style="background-color: lightgreen; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span>	Surrounded on all sides by Green Belt Land (Score 5)
<span style="background-color: red; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span>	Provides a barrier between two or more parts of the same large urban area (Score 0)
<span style="background-color: red; border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span>	Part of Sub-Area provides a barrier between two or more parts of the same large urban area (Score 0)
<span style="border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span>	District Boundaries

#### Drawing Title

#### BROXBOURNE GREEN BELT REVIEW

Purpose 1 Results- role of sub areas in checking the unrestricted sprawl of large built-up areas

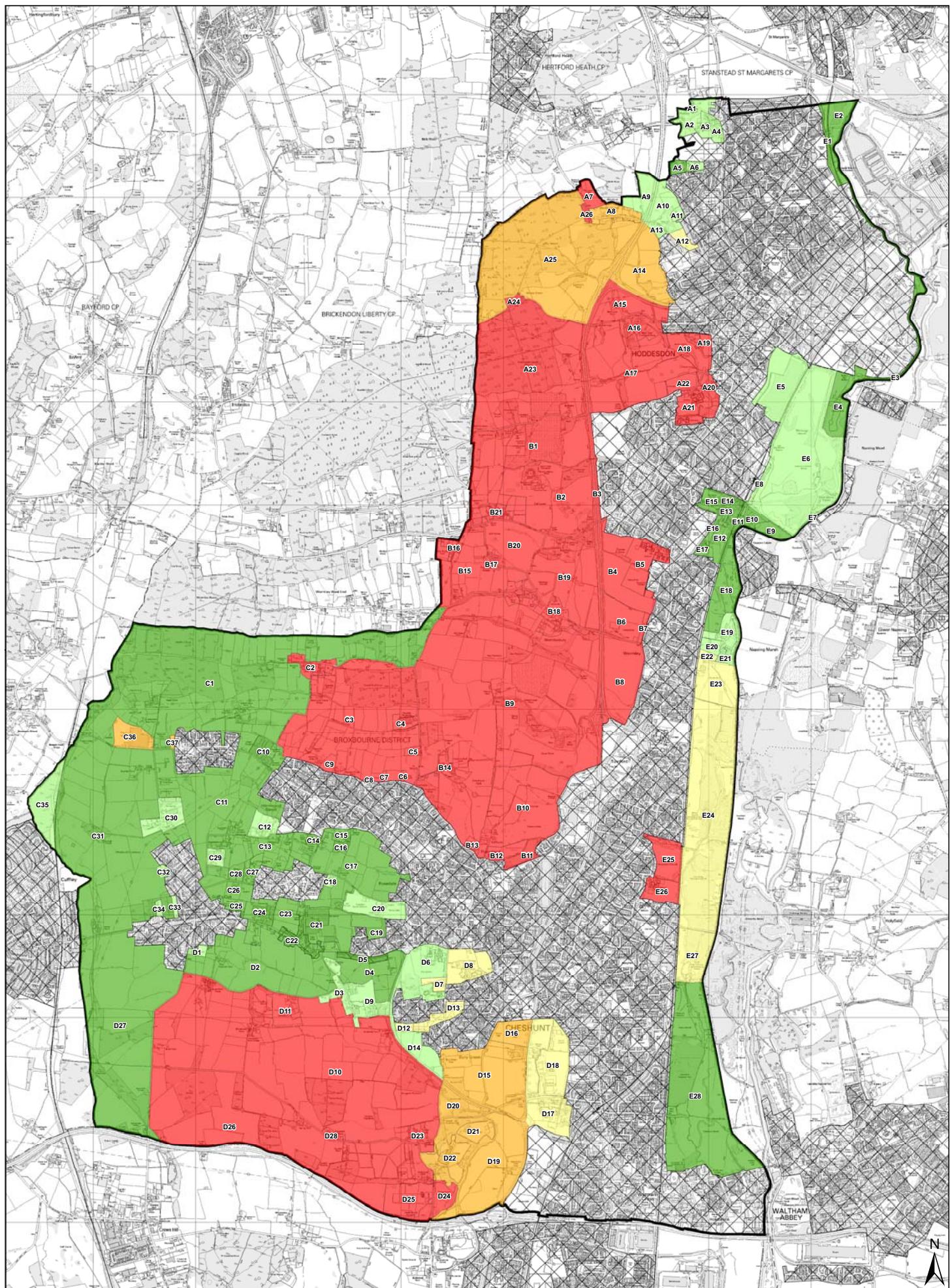
#### Drawing Number

Map 1

Scale at A1 : 1:20,000

Drw DH App PS Rev

Chk RW Date 14/11/07 Date



Legend	
<b>Shortest distance between distinct settlements</b>	
0 - 0.5 km (Score 5)	> 2 km (Score 1)
0.5 - 1 km (Score 4)	Distinct Existing Settlements
1 - 1.5 km (Score 3)	District Boundaries
1.5 - 2 km (Score 2)	

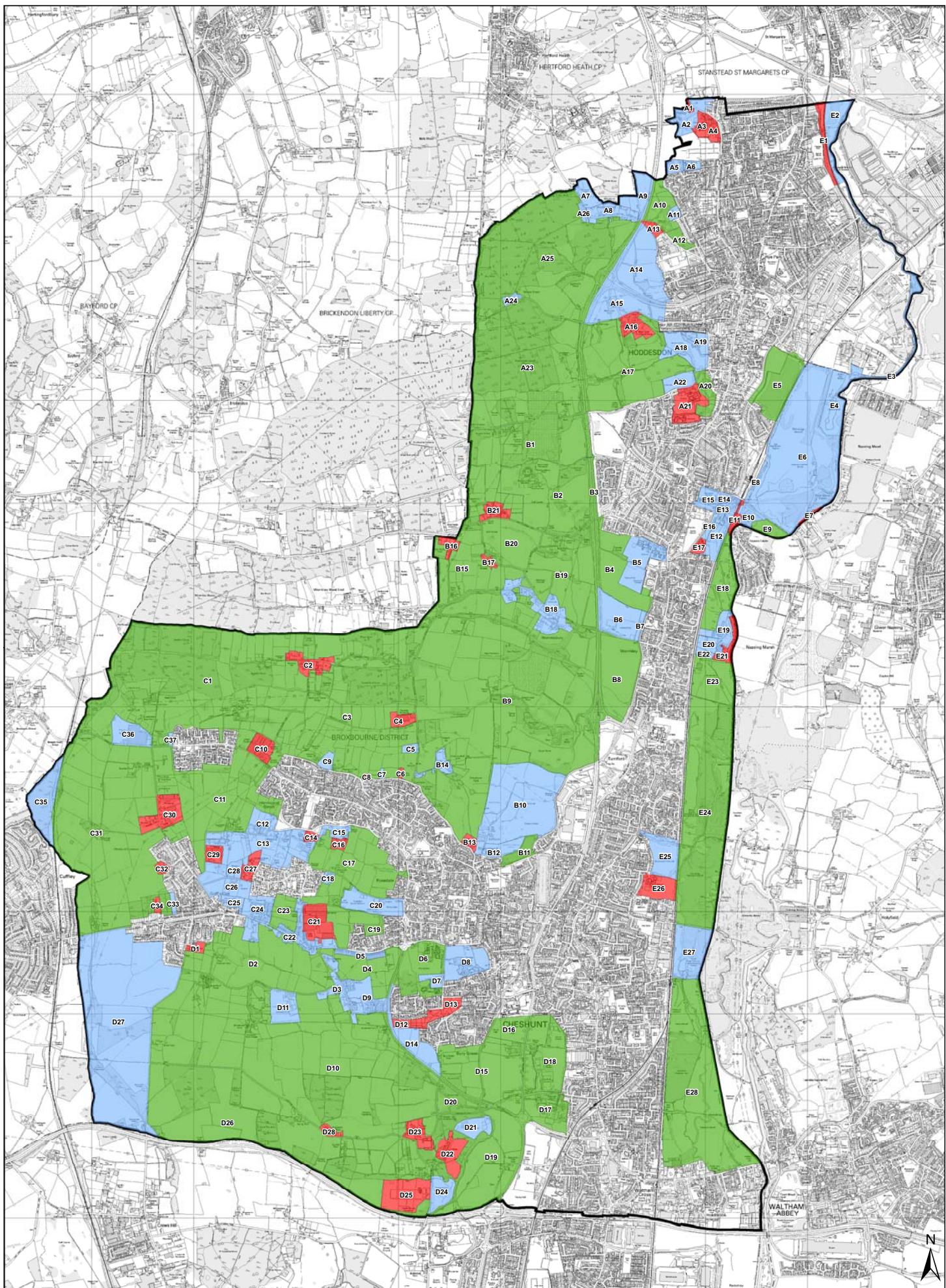
Drawing Title	
BROXBOURNE GREEN BELT REVIEW	
Purpose 2 Results- role of sub areas in preventing neighbouring towns from merging into one another	

Drawing Number  
Map 2

Scale at A1 : 1:20,000

Drw	DH	App	PS	Rev
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Chk	RW	Date	14/11/07	Date
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**Legend**  
**Combined score for safeguarding the countryside from encroachment**

Red	Score 0 - 7
Blue	Score 7 - 13
Green	Score 13 - 20
District Boundaries	

**Drawing Title**

### BROXBOURNE GREEN BELT REVIEW

Purpose 3 Results- role of sub-areas in assisting the safeguarding of the countryside from encroachment

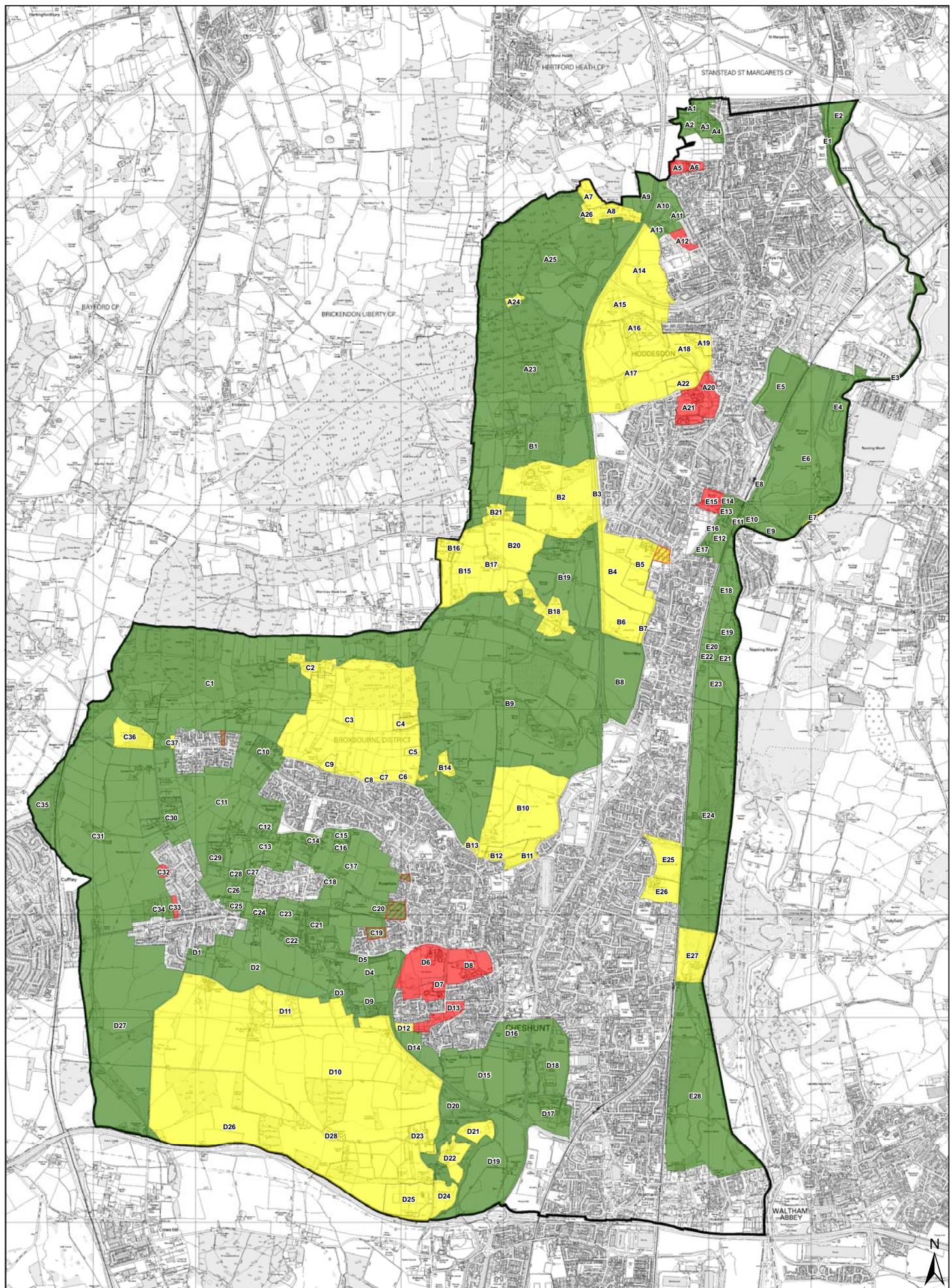
**Drawing Number**

Map 3

Scale at A1 : 1:20,000

Drw DH App PS Rev

Chk RW Date 14/11/07 Date


**Legend**

Total Sub-Area Score

Above 10

Yellow 7 to 10

Red Below 7

White/Red Diagonal Stripes Below 7 - Part of Sub-Area Performs Poorly

District Boundaries

**Drawing Title**
**BROXBOURNE GREEN BELT REVIEW**

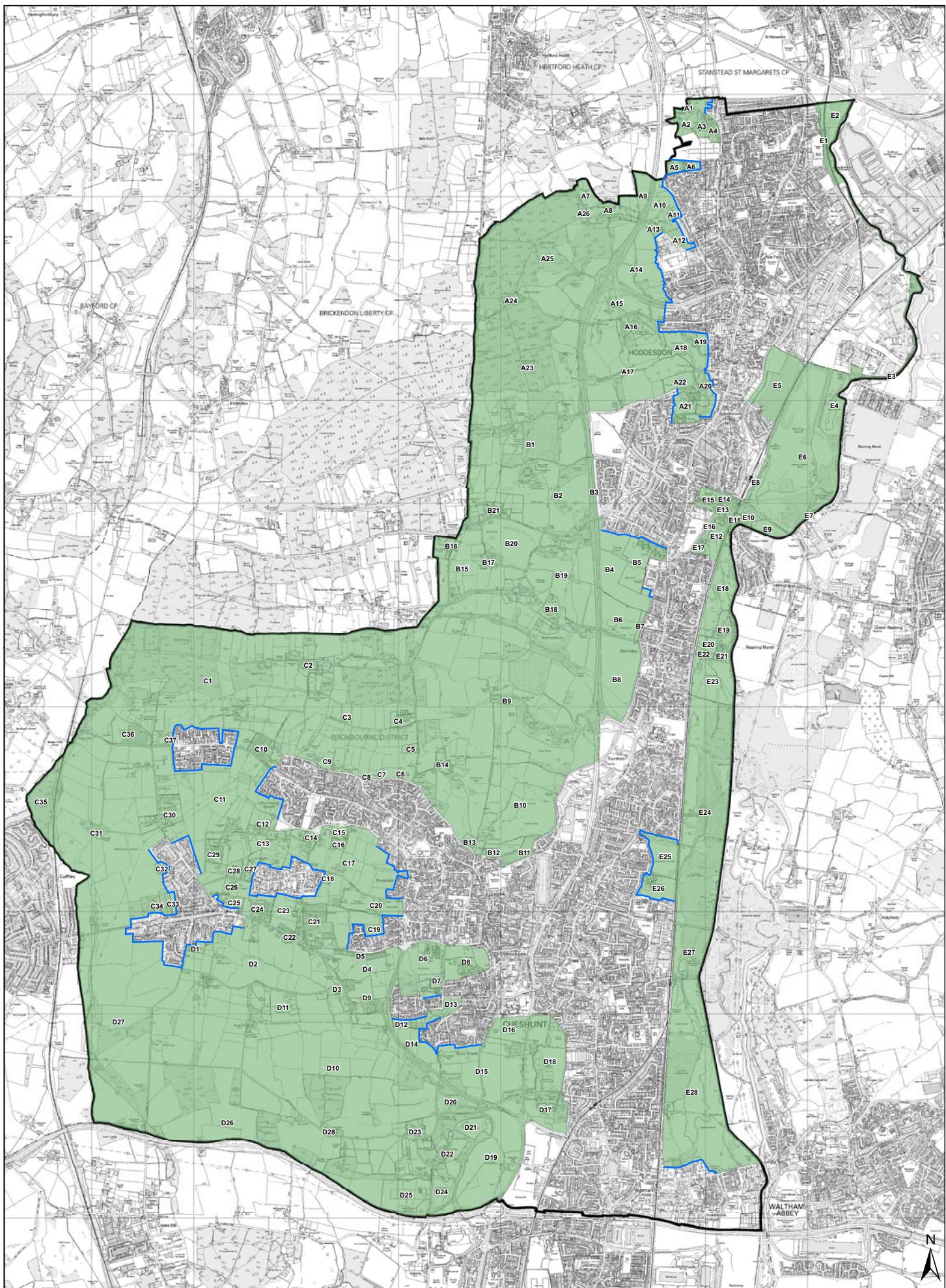
Performance of sub areas against Green Belt purposes 1, 2 and 3.

**Drawing Number**
**Map 4**

Scale at A1 : 1:20,000

Drw DH App PS Rev

Chk RW Date 14/11/07 Date



Legend
— Weak Points in the Broxbourne Green Belt Inner Boundary
Green Belt
District Boundaries

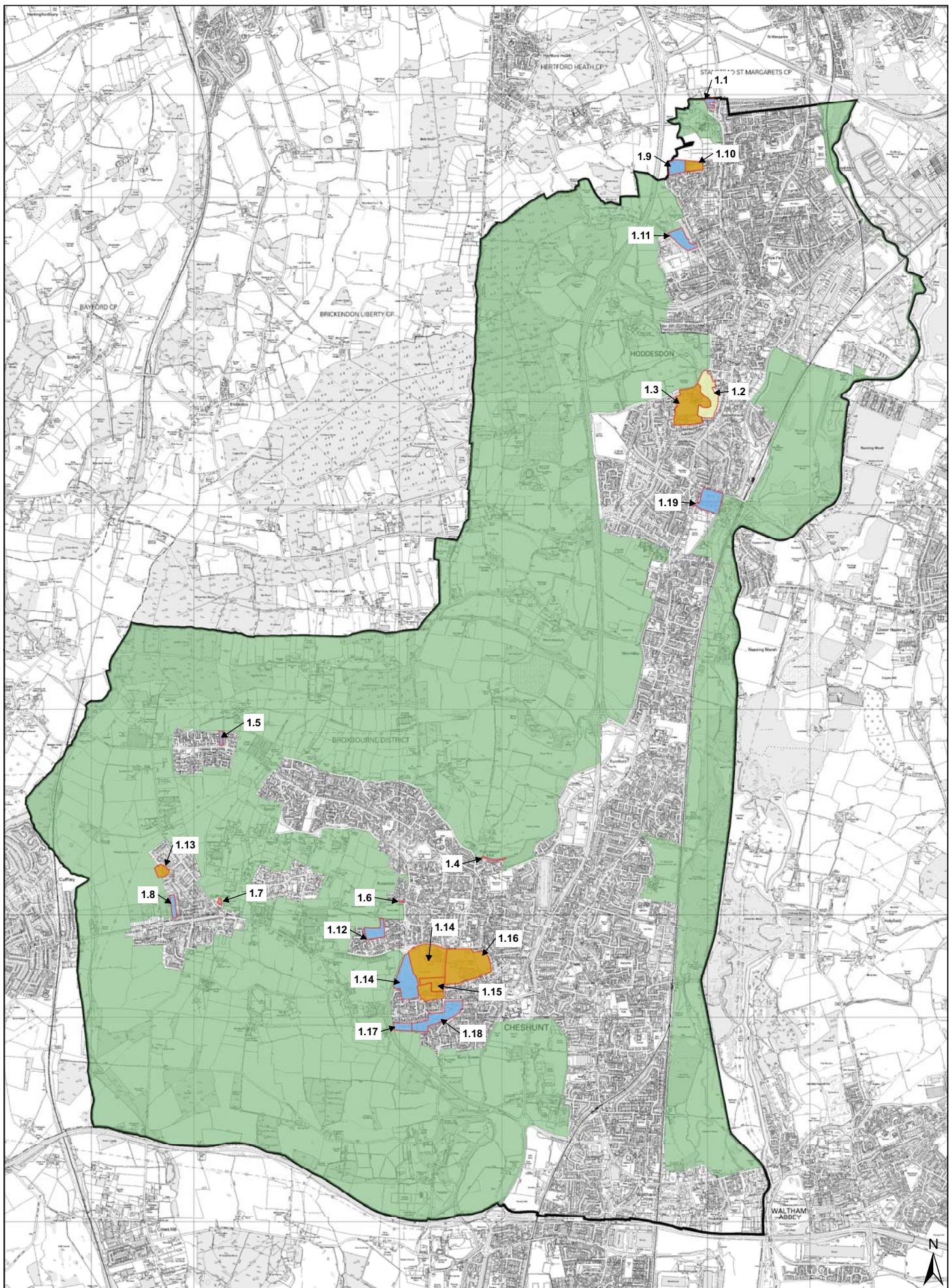
Drawing Title  
**BROXBOURNE GREEN BELT REVIEW**  
Weak points in the Broxbourne Green Belt inner boundary

Drawing Map 5

Scale at A1 : 1:20,000

Drw DH App PS Rev

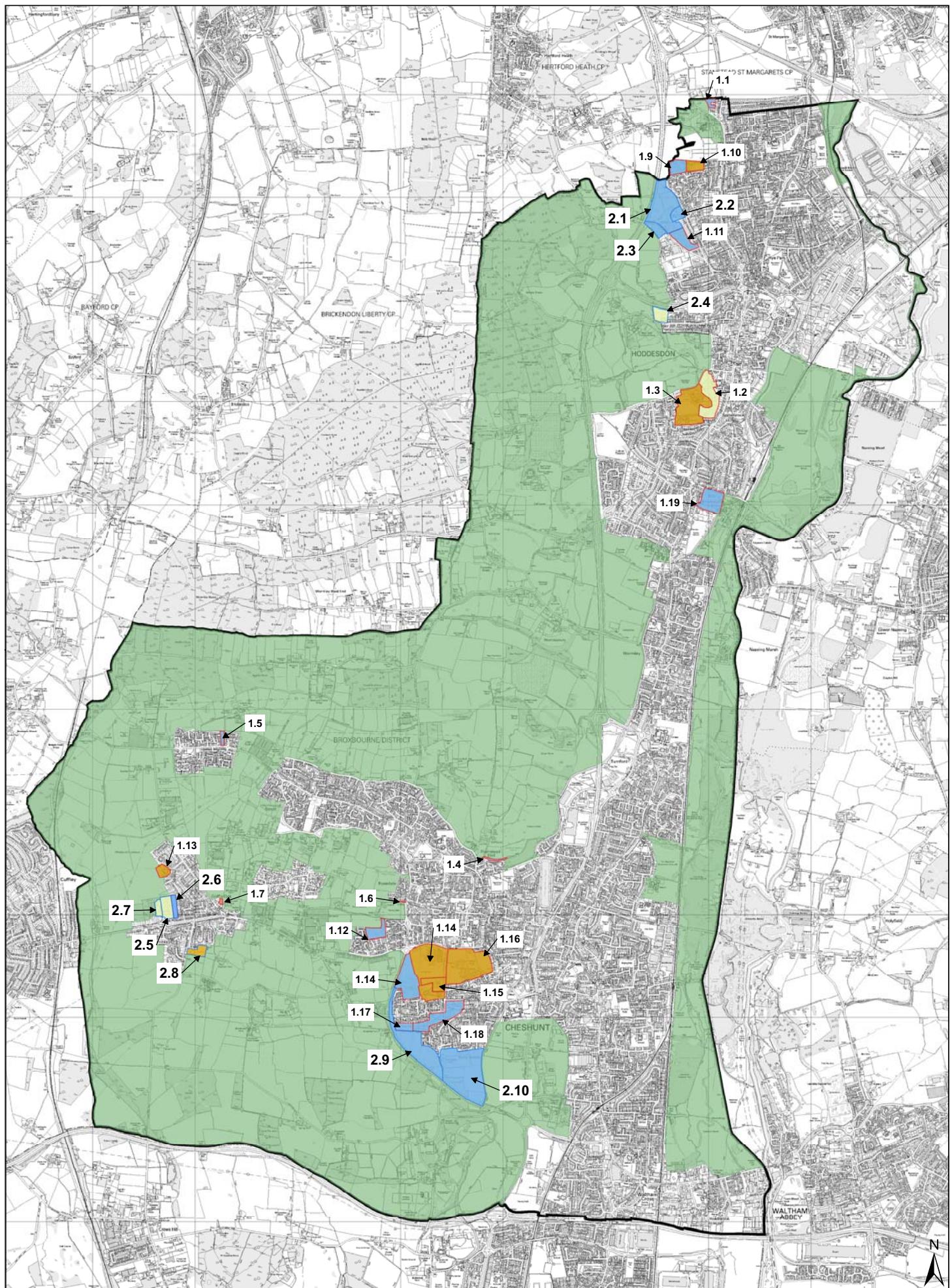
Chk RW Date 14/11/07 Date



Legend
Consider Development
Landscape/Countryside/Open Space Protection Policy
Safeguard
Safeguard and Introduce Schools Policy
Green Belt
District Boundaries

Drawing Title  
BROXBOURNE GREEN BELT REVIEW  
OPTION 1 CHANGES

Drawing Number			
Map 6			
Scale at A1 : 1:20,000			
Drw	DH	App	PSMMa
Chk	RW	Date	Rev
	06/02/08		



<b>Legend</b>
Consider Development
Landscape/Countryside/Open Space Protection Policy
Safeguard
Safeguard and Introduce Schools Policy
Option 2 Sites
Option 1 Sites
Green Belt
District Boundaries

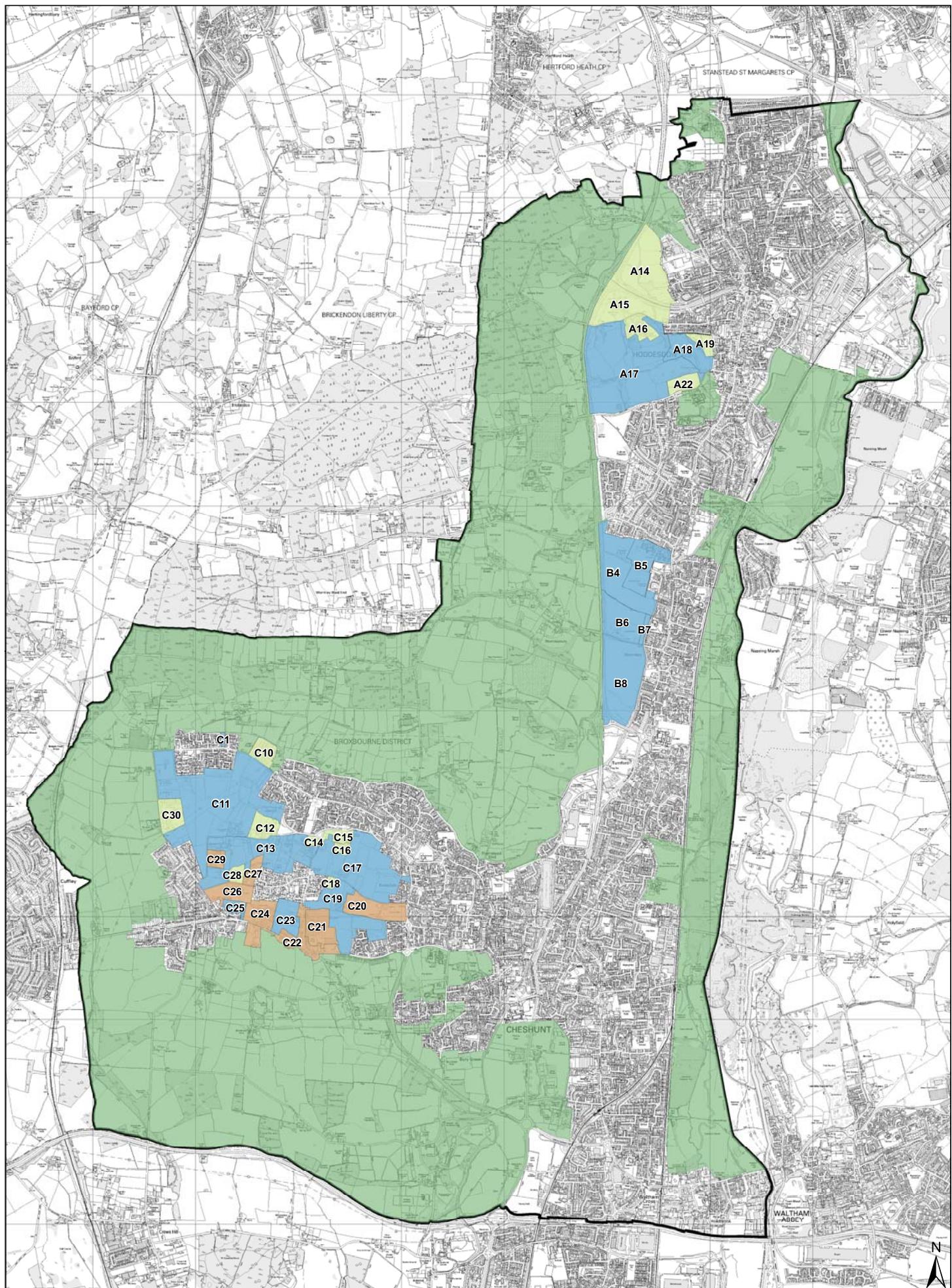
**Drawing Title**  
BROXBOURNE GREEN BELT REVIEW  
OPTION 2 CHANGES

**Drawing Number**  
**Map 7**

Scale at A1 : 1:20,000

Drw DH App PSM Rev

Chk RW Date 06/02/08 Date



Legend	Drawing Title  BROXBOURNE GREEN BELT REVIEW  LONG TERM AREAS OF SEARCH WITH SUGGESTED POLICY APPROACH BY SUB-AREA	Drawing Number <b>Map 8</b>			 <a href="http://www.scottwilson.com">www.scottwilson.com</a>
		Scale at A1 : 1:20,000			
		Drw	DH	App	Rev
		Chk	RW	Date	Date
				06/02/08	