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London Green Belt Assessment

Potential Fundamental Impacts on Green Belt Land Report

Prepared for the Greater London Authority

Final Report

Prepared by LUC

June 2026



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Land Use Consultants Limited

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Contents

Chapter 1	5
Introduction	
Chapter 2	7
Policy context and definition of key terms	
‘Plan area’	8
‘Purposes (taken together)’	8
‘Fundamental’ and ‘meaningful’	8
Chapter 3	11
Potential Strategic Growth Locations Fundamental Impact Assessment	
Cluster 1 – Hadley Wood and Potters Bar	15
Cluster 2 – Trent Park	18
Cluster 3 – Crews Hill	21
Cluster 4 – East Waltham Forest and West Redbridge	25
Cluster 5 – Fairlop and Hainault	28
Cluster 6 – Dagenham, Elm Park and South Hornchurch	31
Cluster 7 – Land in between Chadwell Heath and Collier Row/Romford and Collier Row and Hainault	34
Cluster 8 – Risebridge Golf Course	37
Cluster 9 – Noak Hill	40
Cluster 10 – Harold Park and Harold Wood	43
Cluster 11 – Land in between Cranham and Emerson Park	46
Cluster 12 – Land east of Upminster and Cranham	49
Cluster 13 – Corbets Tey	52
Cluster 14 – Berwick Pond and Woods	55
Cluster 15 – South east of Rainham	58
Cluster 16 – Land in between Coldblow, Dartford, Old Bexley and Foots Cray	62
Cluster 17 – Land in between Foots Cray, Orpington and Swanley	66
Cluster 18 – North, south and central Chislehurst	70
Cluster 19 – South of Bromley	73
Cluster 20 – Chelsfield and Pratts Bottom	76

Cluster 21 – Croydon and New Addington	79
Cluster 22 – Coulsdon	82
Cluster 23 – Chessington and Hook	85
Cluster 24 – Malden Rushett	89
Cluster 25 – North Feltham	92
Cluster 26 – Heston and North Hyde	95
Cluster 27 – Land in between Northolt, Hillingdon and Yeading	98
Cluster 28 – Harlington and Heathrow	101
Cluster 29 – Central Hillingdon	104
Cluster 30 – Land north west of Ickenham and Newyears Green	107
Cluster 31 – Eastcote and Northwood	111
Cluster 32 – Hatch End	113
Cluster 33 – Borehamwood, Edgware and Stanmore	116
Cluster 34 – Mill Hill, Totteridge and High Barnet	119
Cluster 35 – Land in between Barnet and Borehamwood	123
Cluster 36 – Hadley	126
Conclusion	130

Chapter 1

Introduction

1.1 LUC was commissioned by the Greater London Authority (GLA) to undertake an independent, robust and transparent assessment of all Green Belt land in Greater London. LUC first assessed the contribution of Green Belt land and identified where there is potential to define grey belt land in each of the 18 London boroughs with Green Belt land. 12 of the 18 London boroughs commissioned standalone assessment reports, using the same methodology. The methodology, consultation process and findings of this grey belt assessment work can be found in a series of separate London-wide and borough-focussed reports.

1.2 This standalone report focusses on assessing the likelihood for different potential locations for growth (both residential and/or industrial development) across the city to fundamentally undermine the purposes (taken together) of the remaining Green Belt across each Local Plan area in Greater London. Its contents should be read in conjunction with the London-wide report setting out strategic variations in the contribution of Green Belt land.

1.3 The London-wide Green Belt study cannot in isolation identify land that is suitable for development, or set out the necessary exceptional circumstances for releasing land from the Green Belt. This will be done by considering a range of factors and evidence being prepared by the GLA and the London boroughs. This assessment does not attempt to definitively judge whether the release and development of any parts of Greater London's Green Belt would give rise to fundamental impacts on what could remain of the designation with each borough. To do so requires consideration of detailed development proposals or allocations, which have yet to be defined in detail. Instead, the aim of this assessment is to highlight in specific potential growth locations where there is potential for such fundamental impacts and where such impacts are most likely to occur based on the current performance and notable sensitivities of Greater London's Green Belt land. More detailed assessments will be required once detailed development proposals and site allocations have been defined, to establish whether the necessary circumstances for releasing Green Belt land to accommodate allocated development in future Local Plans are sufficiently evidenced and justified, and to inform the determination of relevant planning applications in the Green Belt.

1.4 This study does not consider the impacts or policy implications associated with other land use designations or constraints, including environmental considerations. The assessment is solely concerned with the potential impacts on the ability of land parcels to perform against the purposes of the Green Belt. The findings should

therefore not be considered in isolation or taken out of context. In particular, the assessment should not be used as a standalone basis for determining whether land is suitable for release from the Green Belt or for development.

1.5 This study will be used alongside wider evidence to inform the development of the next London Plan, including decisions regarding the distribution of London's development need across the boroughs. Potential development locations, identified due to their proximity to high quality transport infrastructure have been provided by the GLA and used to inform this assessment. No decision is made regarding the suitability of any of these potential development locations for formal release from the Green Belt designation. The evidence produced in this assessment is designed to inform these decisions in the future, alongside wider considerations such as the sustainability and deliverability of development.

1.6 This report is in an 'Accessible format', which means it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018), as set out in the Web Content Accessibility Guidelines (WCAG 2.1). It has larger font, larger spacing between lines and headings, 'alternative text' provided for all figures and it can be read by screen-reading software.

1.7 The rest of the main body of the report is structured as follows:

- **Chapter 2** outlines the policy and practice guidance and defines the key terms directly relevant to the assessment of fundamental impacts to Green Belt land.
- **Chapter 3** outlines the approach to the assessment and its findings.

Chapter 2

Policy context and definition of key terms

2.1 Green Belt assessments must consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole. This is driven by two paragraphs in the National Planning Policy Framework (NPPF).

2.2 Paragraph 146, relating to exceptional circumstances, states ‘where an authority cannot meet its identified need for homes, commercial or other development through other means...authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.’

2.3 Paragraph 155 states the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where:

- the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- there is a demonstrable unmet need for the type of development proposed;
- the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.

2.4 Associated Planning Practice Guidance (PPG) states that a Green Belt assessment should not be limited to the impact of release or development of grey belt land but any Green Belt land, and requires consideration of fundamental impact to all five Green Belt purposes (taken together) to all remaining Green Belt across the plan area as a whole.

2.5 Such Green Belt locations should only be discounted for release or development where they would ‘affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way’ (PPG Paragraph: 008 Reference ID: 64-008-20250225).

2.6 What is fundamental and meaningful could vary significantly based on the scale and nature of the plan area and the range, significance and extent of contribution Green Belt land makes to the Green Belt purposes within it. Furthermore, the scale and land use of future development significantly influences what is fundamental and meaningful in any given location.

2.7 The PPG uses a few terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

‘Plan area’

2.8 With regards to the London Plan area of Greater London as a whole, it is reasonable to conclude that no combination of proposals within a single London borough are capable of fundamentally undermining the purposes (taken together) of the remaining Green Belt across Greater London as a whole. No single London borough includes a significant enough development need and proportion of the whole Greater London’s Green Belt land for this to be a reasonable scenario. In addition, it will be the individual London Boroughs that ultimately make Green Belt planning decisions through the preparation or updating of their Local Plan. Therefore, judgements relating to fundamental and meaningful impacts on remaining Green Belt are confined to individual Local Plan areas at the borough level. This approach is consistent with the wider Green Belt assessment work undertaken by LUC for the GLA and commissioning London boroughs.

‘Purposes (taken together)’

2.9 Most Green Belt land does not contribute to all Green Belt purposes to the same degree, with large areas of Green Belt land not contributing or contributing weakly to multiple purposes. This is corroborated by the findings of the London-wide Green Belt assessment reported on separately to this assessment report. Consequently, what constitutes a fundamental and meaningful impact varies from plan area to plan area depending on which purposes are important. Release or development that fundamentally and meaningfully impacts a borough’s Green Belt land contributing to one Green Belt purpose would in effect affect its ability to serve the purposes (taken together) in a meaningful way.

‘Fundamental’ and ‘meaningful’

2.10 Some proposals may only fundamentally undermine the ability of the remaining Green Belt land in a plan area to serve a single important purpose to have a

meaningful impact. Other proposals may undermine multiple purposes to a degree that in combination their impact is meaningful. Generally speaking, the former is likely to occur more than the latter when considering the release and development of discrete growth locations in a plan area. This is the case in this high-level assessment of potential growth areas of search across the city.

2.11 The scale and contiguity of Green Belt land within a borough may also play a role in what is meaningful. Release or development of smaller areas of Green Belt land are likely to be more meaningful in boroughs with smaller areas of Green Belt land. Release or development of pockets of Green Belt land that are isolated from the wider designation within urban areas are less likely to have a meaningful impact.

2.12 A fundamental and meaningful impact on Purpose A (to check the unrestricted sprawl of large built-up areas) in an individual borough context may include but is not limited to where release or development of land that would result in the physical or perceived merging of a large built-up area with an adjacent satellite settlement such that the adjacent settlement would be perceived to be part of a larger 'sprawling' large built-up area. How fundamental and meaningful the loss of a such a gap would be is dependent on its current contribution to Purpose A relative to the wider contribution of Green Belt land in a plan area to this purpose. For example, the development of a weak or more moderately contributing gap surrounded by more strongly contributing Green Belt land in a plan area is less likely to result in such fundamental impacts to this purpose. Most sprawl of a large built-up area will not fundamentally undermine the ability of remaining Green Belt land to continue to fulfil this function; however, particularly large and incongruous fingers of sprawl relative to the size and existing pattern of Green Belt land in a plan area could be.

2.13 A fundamental and meaningful impact on Purpose B (to prevent neighbouring towns from merging into one another) in an individual borough context may include but is not limited to release or development that would result in the physical or perceived merging of two currently distinctly separate neighbouring towns, or where release or development would result in the loss of the most substantial part of a gap separating neighbouring towns such that it no longer played a meaningful role in relation to Purpose B. Release or development of Green Belt land that lies between two neighbouring towns that have already been merged directly or indirectly by intervening development is less likely to result in fundamental and meaningful impacts on Purpose B; however, such impacts could still occur where such remnant gaps still maintain meaningful separation between towns and cover a meaningful proportion of a plan area's Green Belt land, for example. Whether the merging of two neighbouring towns is meaningful in a borough context may also be influenced by the number of neighbouring towns that could remain distinctly separate by remaining Green Belt land.

2.14 A fundamental and meaningful impact on Purpose C (to assist in safeguarding the countryside from encroachment) in an individual borough context may include where release or development would fundamentally and meaningfully undermine the countryside in the remaining Green Belt land within the plan area. For example, where release or development would physically/visually sever and isolate substantial areas of the remaining Green Belt land, such that the relationship of the area to the surrounding countryside was fundamentally and meaningfully undermined. Most encroachment of the countryside will not fundamentally undermine the ability of remaining Green Belt land to continue to fulfil a countryside function.

2.15 A fundamental and meaningful impact on Purpose D (to preserve the setting and special character of historic towns) in an individual borough context may include but is not limited to the release or development of an area of open Green Belt land that forms an important or very important part of the setting of a historic town, integral to its special character. Fundamental and meaningful impacts on Purpose D must be clearly linked though evidence to the setting and special character of a historic town, i.e. significant impacts on the historic significance of individual designated or non-designated historic assets may often not, in isolation, be fundamental and meaningful to the setting and special character of a historic town.

2.16 A fundamental and meaningful impact on Purpose E (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) is not considered likely given that other Green Belt policy prioritise the use of non-Green Belt locations first followed by previously developed land in the Green Belt, i.e. it is unlikely that Green Belt release or development could be justified having not already demonstrated that this purpose has not been fundamentally and meaningfully undermined. Therefore, no potential for fundamental impacts on Purpose E (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) are identified in the chapter below.

2.17 The potential for a fundamental impact to occur is likely, but not necessarily always, to be lower where land lacks openness and has already been subject to a degree of development. However, this requires a balanced judgement, as the extent to which there is the potential for a fundamental impact will depend on the specific circumstances of the land and its context.

Chapter 3

Potential Strategic Growth Locations Fundamental Impact Assessment

3.1 As part of the development of a long term spatial strategy for London, the Greater London Authority (GLA) must consider whether any unmet development needs which cannot be met by other means can be accommodated in a sustainable manner within the Green Belt. To help understand this, the GLA has identified several locations that have potential to accommodate growth in a sustainable manner, based on their proximity to high quality transport infrastructure.

3.2 Not all of these locations will be selected for inclusion with the London Plan's growth strategy. Some, upon further investigation, may prove unsuitable or unsustainable based on a variety of materials considerations. These decisions will ultimately be made through the production of the draft London Plan and its testing through Examination. Any decision relating to the release and development of Green Belt land also still requires full consideration by London boroughs through the preparation of future local plans. This assessment will, however, provide further evidence on the long list of potential locations and will be used by the GLA in preparing the draft London Plan.

3.3 The initial definition of potential areas of search for growth has focused on land which meets the following accessibility tests:

1. For residential uses, land that is within 1.2km (or a 15 minute walk) of an existing or potential future high quality rail station within and in close proximity to Green Belt land.
2. For industrial uses, land that is within 2.5km of a junction with the strategic road network considered suitable to accommodate a high volume of HGV/LGV traffic.

3.4 In order to provide a more accurate indication of the land within these areas of high accessibility that might be suitable for future release, various discounts were made by the GLA. These included removing areas based on the presence of high sensitivity land use constraints, physical or environmental features and barriers and areas of high topographical variations. For the purposes of this study, these factors are collectively referred to as 'primary constraints' – further details of which are provided in GLA's wider evidence base. These are termed 'primary' constraints on the basis that their presence would unambiguously preclude any opportunity for release for sustainable development. The primary constraints used informed the GLA's initial definition of areas of search for potential future growth are not intended

to represent a comprehensive list of all the factors that need to be considered to determine a site allocation's suitability for release.

3.5 Upon receipt of the GLA's areas of search, LUC undertook some additional data cleaning in preparation for the assessment. Pockets of Green Belt land within the relevant areas of search buffers that were smaller than 5ha or Green Belt land that exclusively featured existing road and rail infrastructure were removed from the assessment in order to maintain consistency in the scale of wider Green Belt assessment work undertaken across Greater London.

3.6 The areas of search for growth were then grouped into reasonable geographical clusters (potential growth area clusters) for assessment, considering relevant London borough plan areas, likely Green Belt impacts and established railway corridors.

Figure 3.1 illustrates their location and extent.

3.7 Each potential growth area cluster is assessed in order of their assigned number, starting in the London Borough of Enfield and working clockwise around the city. Each potential growth area cluster assessment is accompanied by a figure map that illustrates the likelihood for fundamental impacts to the wider Green Belt land within and in close proximity to the potential growth area cluster. Two ratings are used:

- **More Likely** – clear potential for fundamental impacts on the remaining Green Belt land in one or more local plan area as a whole.
- **Potential** – some potential for fundamental impacts on the remaining Green Belt land in one or more local plan area as a whole.

3.8 The release and development of areas outside of the potential growth area clusters have not been assessed for their potential to result in fundamental impacts on the remaining Green Belt land in one or more local plan area as a whole in this report.

3.9 Without a detailed understanding of the exact location of release or development, its scale and land use, including what Green Belt land would remain within a plan area, it is not possible to make a definitive judgement on fundamental impacts in any location at this scale and stage of the plan-making process. This assessment highlights where there is potential for such fundamental impacts and where such impacts are most likely to occur in specific potential growth locations.

3.10 Each map is accompanied by some high-level justification text on the spatial variations in the potential likelihood of fundamental impacts on:

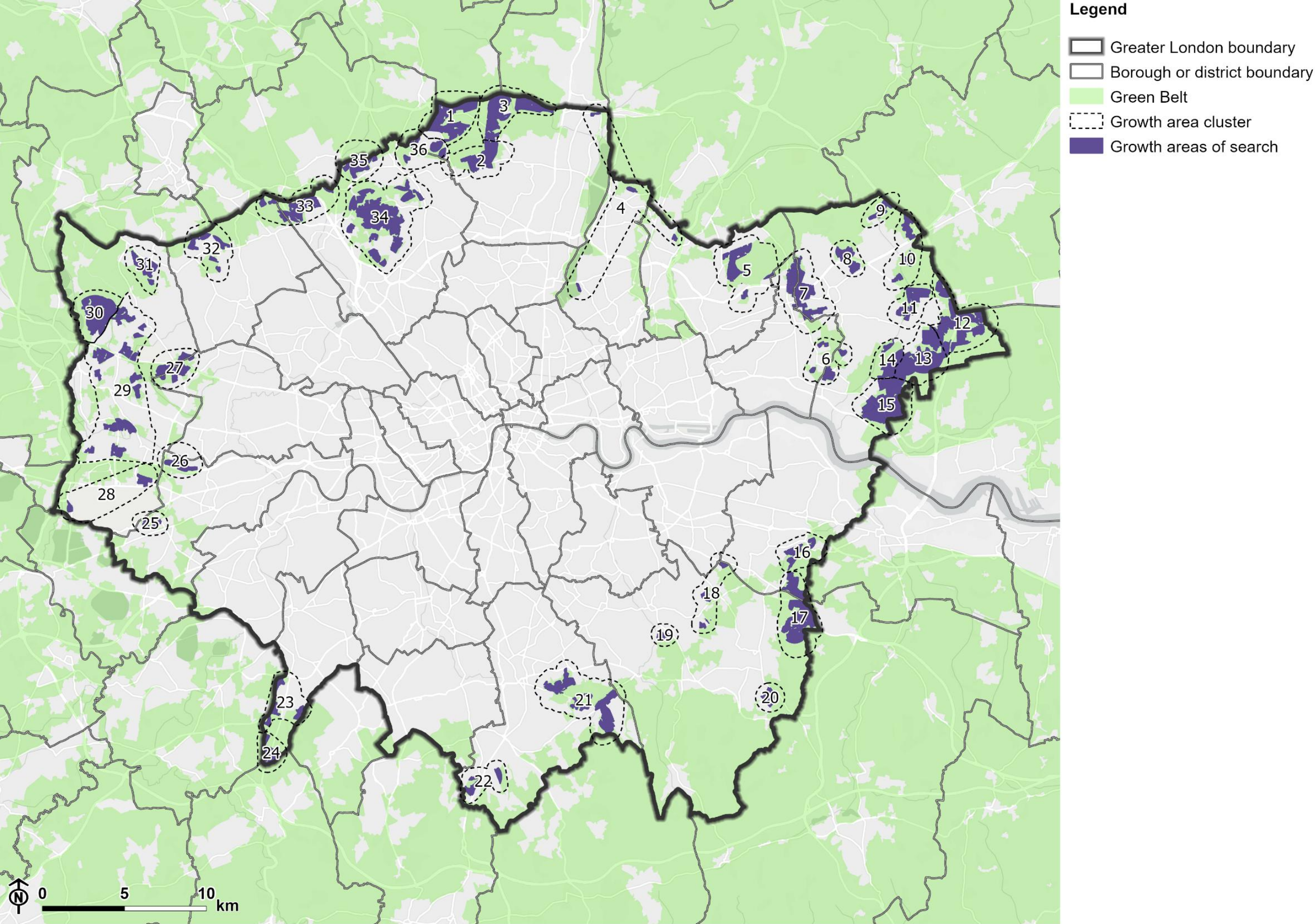
- a) each affected plan area; and,

- b) whether development in combination with neighbouring potential growth area clusters could result in other fundamental impacts to a plan area.

3.11 Please note that fundamental impacts could occur on land that is identified as grey belt. In this assessment however no such potential was identified and as such the figures show the grey belt and areas of likely/potential fundamental impacts as mutually exclusive. As is the case with all findings from this assessment, more detailed consideration will still be required at the local stage should proposals for release or development come forwards on any given parcel.

3.12 Consideration of potential additional in combination fundamental impacts are focussed exclusively on the interactions between potential growth area clusters identified by the GLA in Greater London. No consideration has been given to growth scenarios being considered outside and in the immediate vicinity of Greater London. The assessment does however consider, where relevant, if development within the GLA boundary would have a fundamental impact on Green Belt land in a neighbouring authority, although no such wider fundamental impacts were identified in the areas assessed.

Figure 3.1: Growth Clusters and Areas of Search in Greater London



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Cluster 1 – Hadley Wood and Potters Bar

3.13 This potential growth cluster is located in the north western corner of the London Borough of Enfield. It directly abuts the neighbouring borough of Welwyn Hatfield to the north, beyond the M25, and Hertsmere District to the west up and across the Hornbeam Hills, both in the neighbouring county of Hertfordshire.

3.14 The area is made-up of a large potential growth area north and north east of Hadley Wood.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.15 The isolated release and development of the majority of the growth area in this cluster is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the London Borough of Enfield or neighbouring borough of Welwyn Hatfield or Hertsmere District. The Hornbeam Hills and Fenny Slade Hill in neighbouring Hertsmere District maintain separation between New Barnet/Enfield (via Hadley Wood) and Potters Bar to the west. The M25 to the north plays both a separating and connecting role between neighbouring towns in Greater London and Potters Bar. The Ridgeway (A1005) also plays a connecting role. The northward expansion of Greater London up to the highest ground within the growth area north and west of St John's School and south of the M25 has potential to result in fundamental impacts on Green Belt Purposes A (checking the unrestricted sprawl of large built-up areas) and B (preventing neighbouring towns merging into one another). Consolidation and expansion of the existing development on the higher ground directly south of Potters Bar and north and south of The Ridgeway could create the perception of merging between New Barnet/Enfield (via Hadley Wood) and Potters Bar east of Junction 24 of the M25, particularly if further development were to occur immediately to the west and north west in neighbouring Hertsmere District. However, it is acknowledged that the wider Green Belt within the borough and neighbouring boroughs would also would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact to Purpose B (preventing neighbouring towns merging into one another) on the wider Green Belt within a plan area as a whole.

3.16 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's

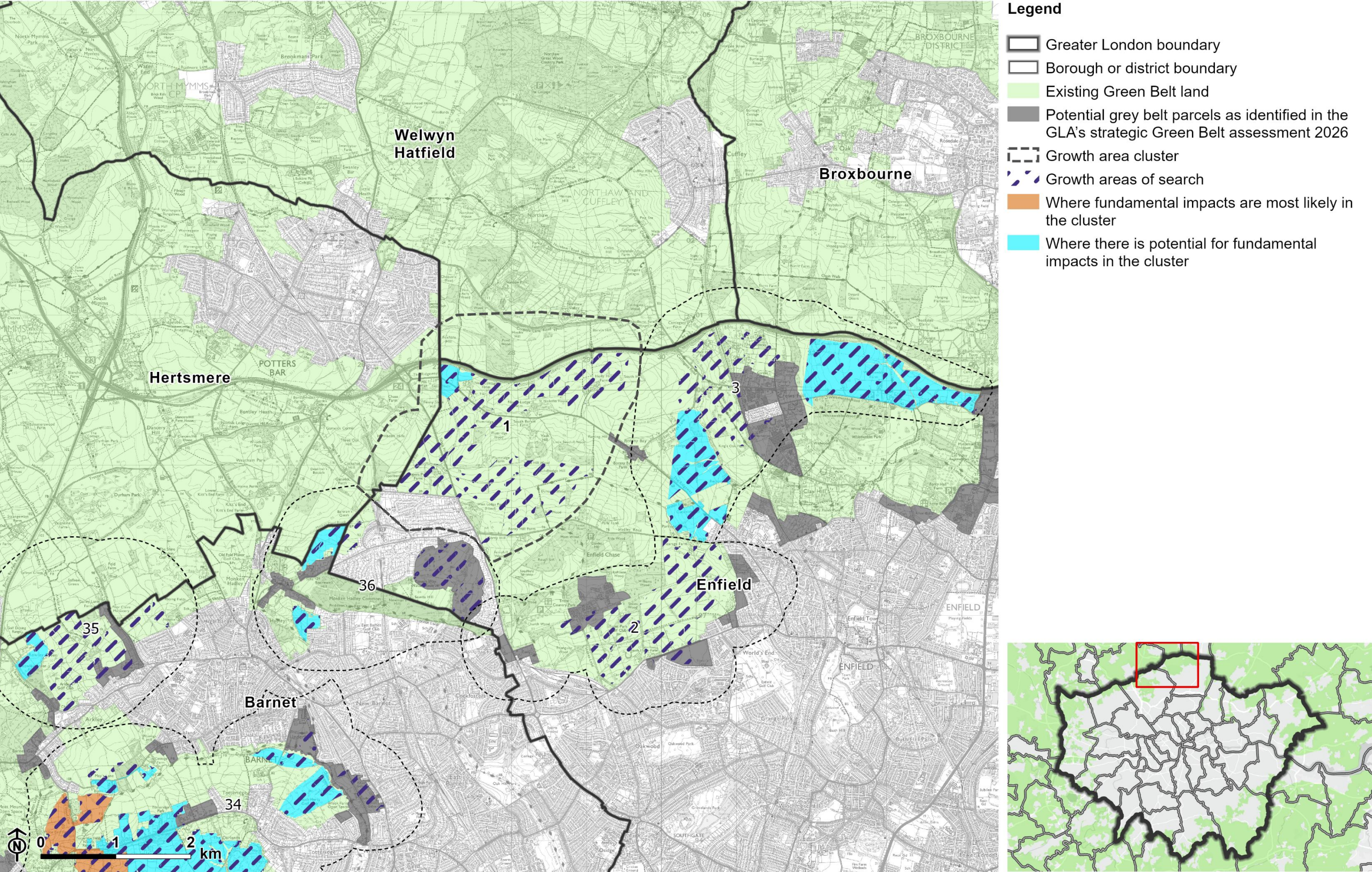
contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would continue to contribute to this purpose.

3.17 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.18 The release and development up to, beyond and along the A1005 within growth area cluster 1 (Hadley Wood and Potters Bar) and the westward expansion of cluster 3 (Crews Hill) in combination would significantly contain the currently strongly contributing open countryside to the south within the London Borough of Enfield, including Trent Park from the wider open countryside north of the M25. The greater isolation of this large area of open countryside has the potential to result in fundamental impacts on Purpose C (protecting the countryside from encroachment), although this is not considered likely given a suitably large corridor of open countryside would likely remain north and south of the small settlement of Botany Bay. Furthermore, if release and development in the borough was limited to these locations, the eastern half of the boroughs open countryside designated as Green Belt would likely remain open and connected to the wider open countryside to the north.

Figure 3.2: Assessment of Fundamental Impacts within Hadley Wood and Potters Bar Growth Area of Search



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Cluster 2 – Trent Park

3.19 This potential growth cluster is located in the central north western part of the London Borough of Enfield.

3.20 The area is made-up of a cluster of two areas of search for potential growth:

- A smaller area in the west on land north of Cockfosters underground tube station.
- A larger area stretching from the land south of Trent Park east and north eastwards around Trent Park Equestrian Centre and South Lodge Farm up to Hadley Road and Vicarage Farm.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.21 The release and development of the growth area in this cluster is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined, given the existing development at Trent Park in combination with the wider woodland blocks of the Trent Country Park, which maintain separation between the neighbouring towns of New Barnet and Enfield Town and inhibit further northward sprawl and encroachment of the countryside.

3.22 The release and development of the area in its entirety would sever the currently strongly contributing open countryside to the east and south east either side of Salmon's Brook (all within the London Borough of Enfield) from the wider open countryside to the west and north. The isolation of this area has the potential to result in fundamental impacts on Purpose C (protecting the countryside from encroachment). However, the likelihood of this is somewhat limited, due to the fact that large portions of this area already make a more moderate contribution to Purpose C and because this area represents a relatively small proportion of the borough's open countryside designated as Green Belt, with the vast majority continuing to remain open and connected to the wider open countryside.

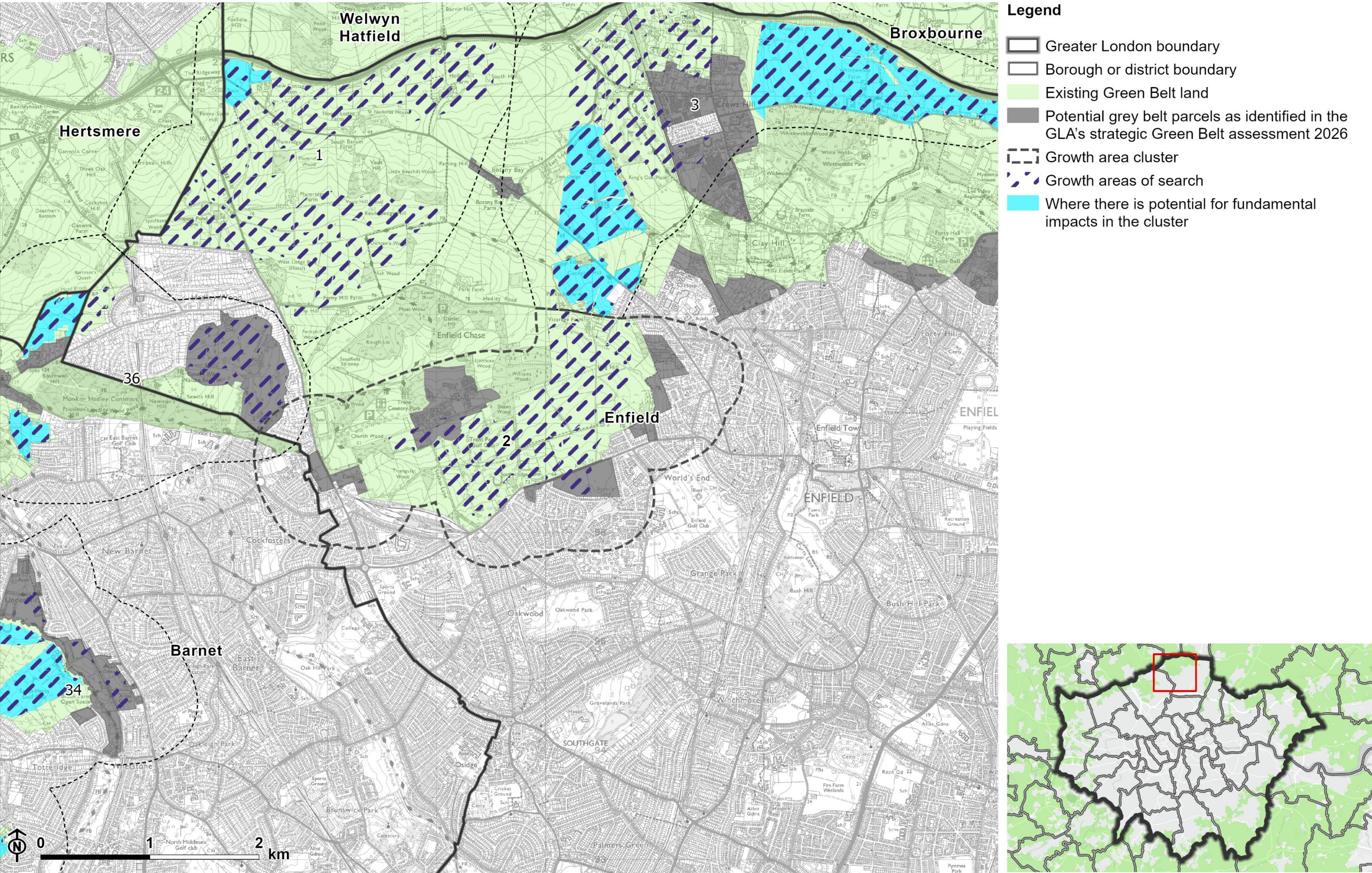
3.23 With regards to Purpose D (preserving the setting and special character of historic towns), no Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release

and development in this area is unlikely to result in fundamental impacts on this purpose.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.24 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.3: Assessment of Fundamental Impacts within Trent Park Growth Area of Search



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Cluster 3 – Crews Hill

3.25 This potential growth cluster is located in the central northern part of the London Borough of Enfield. It lies in close proximity to the borough of Welwyn Hatfield to the north west and Broxbourne Borough to the north, beyond the M25, in the neighbouring county of Hertfordshire.

3.26 The area is made-up of two areas of search for potential growth:

- A potential growth area including and surrounding Crews Hill and stretching south west (either side of The Ridgeway).
- A potential growth area south of the M25, north of Whitewebbs Road / Whitewebbs Lane, Cuffley Brook to the west and Chapel Manor to the east.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.27 The isolated release and development of the majority of the growth areas in this cluster are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the London Borough of Enfield or the neighbouring boroughs of Broxbourne and Welwyn Hatfield. This includes the isolated release and development of all areas of existing developed and urbanised land in the growth areas, which generally make no more than a moderate contribution to the Green Belt purposes. The same can be said for release and development of the more open and less urbanised strongly contributing Green Belt land that could not result in the assimilation of Botany Bay and/or Crews Hill with the large built-up area of Greater London. This includes the open Green Belt land immediately north, north west and east of Crews Hill and in the immediate vicinity of the urban edge of Greater London both north and south of The Ridgeway.

3.28 The release and development up to and including the open countryside currently maintaining separation between Crews Hill (merged with Clay Hill) and the urban edge of Greater London is most likely to result in fundamental impacts on Green Belt Purpose A (checking the unrestricted sprawl of large built-up areas). Within the London borough of Enfield, Crews Hill/Clay Hill represents the only substantial urban area separated from the large built up area of Greater London. Their physical or perceived merging through release and development west of the railway line connecting them could create a notably incongruous and continuous finger of urban sprawl into what would remain of the borough's Green Belt. However, the existing density and extent of urbanising development in Crews Hill/Clay Hill

already has a notable sprawling impact on the Green Belt near to the large built up area of Greater London in the borough, limiting the meaningful impact of further development immediately to the north, east and west of the urban area. Furthermore, the M25 to the north limits wider impacts on the Green Belt land in the neighbouring plan area to the north.

3.29 If Crews Hill were to expand into a large settlement of equivalent size to other Green Belt towns within and in close proximity to the borough, the merging of the new town with the neighbouring town of Enfield (within Greater London) could also result in a fundamental impact on Green Belt Purpose B (preventing neighbouring towns merging into one another). However, it is acknowledged that the wider Green Belt within the borough and neighbouring boroughs would also continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

3.30 The westward expansion of the large built-up area of Greater London along The Ridgeway into the smaller satellite settlement of Botany Bay could also be notably incongruous, with the potential for fundamental impacts on Green Belt Purpose A (checking the unrestricted sprawl of large built-up areas). The isolated westward expansion of Crews Hill into Botany Bay would be less likely to result in fundamental impacts on Green Belt Purpose A (checking the unrestricted sprawl of large built-up areas), subject to the large built-up area of Greater London continuing to be separated from the smaller satellite settlements of Botany Bay and Crews Hill.

3.31 Similarly, an eastward expansion of the Crews Hill growth area beyond the Cuffley Brook and along the M25 and Whitewebbs Road / Whitewebbs Lane and/or the westward expansion of Enfield along the same connecting roads via Capel Manor could also result in the physical or perceived merging of the large built-up area of Greater London with Crews Hill, with the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas), and Purpose B (preventing neighbouring towns merging into one another) if Crews Hill were to expand into a large settlement of equivalent size to other Green Belt towns within and in close proximity to the borough. However, the extent of the Forty Hill Conservation Area directly to the east and south east in between the existing urban area of Greater London reduces the likelihood of this somewhat. Furthermore, with respect to Purpose B (preventing neighbouring towns merging into one another), it is acknowledged that the wider Green Belt within the borough and neighbouring boroughs would also continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one

of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

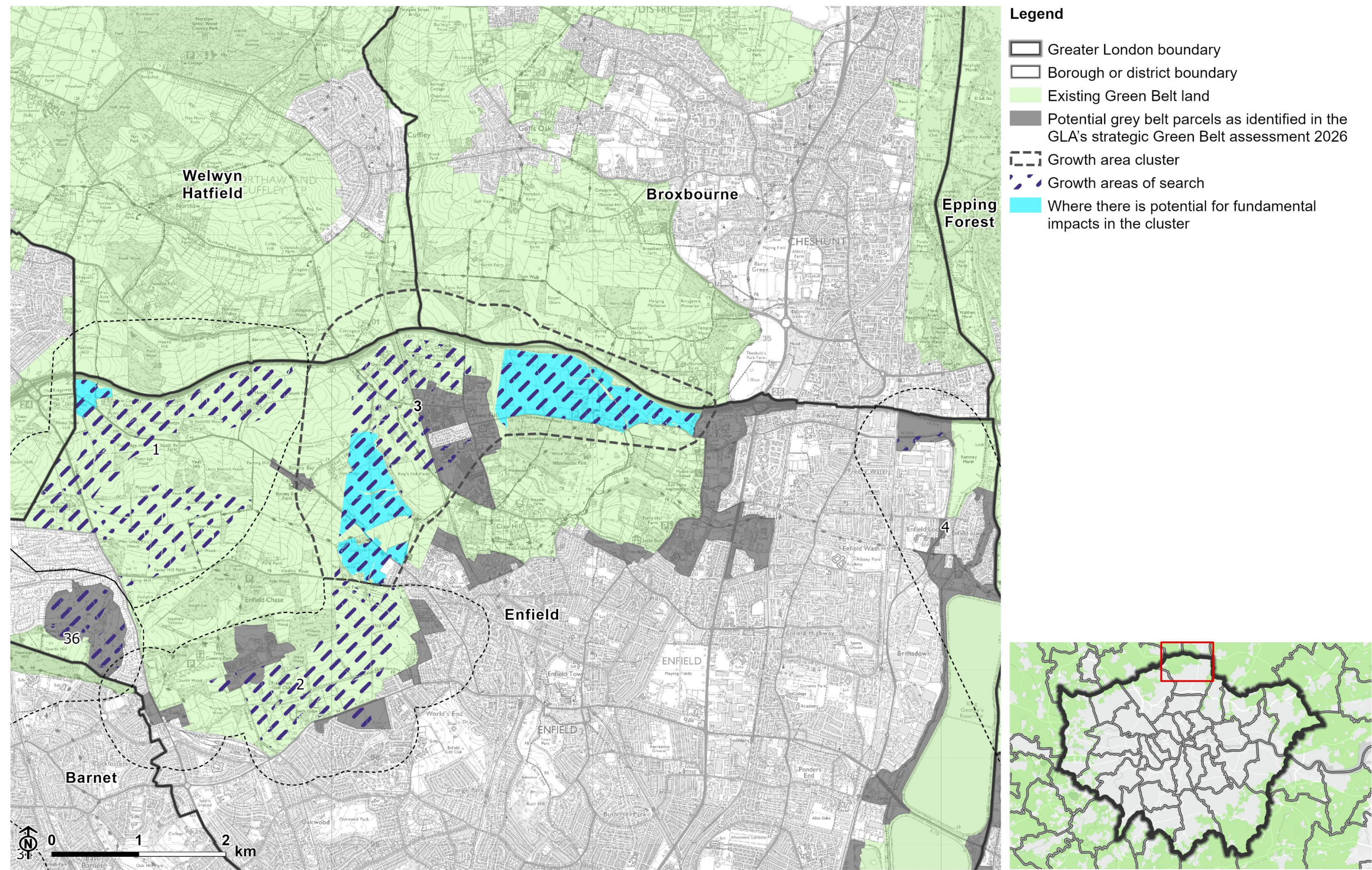
3.32 If the growth areas within this cluster were released and developed in their entirety, the resulting urban form could almost sever the strongly contributing open countryside within Whitewebbs Park and the Forty Hill Estate from the wider open countryside to the north (beyond the M25) and west (beyond Crews Hill and Clay Hill), with the potential for fundamental impacts on Purpose C (protecting the countryside from encroachment). However, the likelihood of this is limited by the fact that the western half of the London borough of Enfield's open countryside would likely remain open and connected to the wider open countryside to the north.

3.33 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.34 The release and development up to, beyond and along the A1005 within growth area cluster 1 (Hadley Wood and Potters Bar) and the westward expansion of cluster 3 (Crews Hill) in combination would significantly contain the currently strongly contributing open countryside to the south within the London Borough of Enfield, including Trent Park from the wider open countryside north of the M25. The greater isolation of this large area of open countryside has the potential to result in fundamental impacts on Purpose C (protecting the countryside from encroachment), although this is not considered likely given a suitably large corridor of open countryside would likely remain north and south of the small settlement of Botany Bay. Furthermore, if release and development in the borough was limited to these locations, the eastern half of the boroughs open countryside designated as Green Belt would likely remain open and connected to the wider open countryside to the north.

Figure 3.4: Assessment of Fundamental Impacts within Crews Hill Growth Area of Search



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Cluster 4 – East Waltham Forest and West Redbridge

3.35 This potential cluster of growth areas is located in the north east of the London Borough of Enfield, in the east of the London Borough of Waltham Forest and the west of the London Borough of Redbridge. Some of the growth areas in the north of the boroughs lie in close proximity to Green Belt land within neighbouring Epping Forest District in the neighbouring county of Essex.

3.36 The area is made-up of four relatively small areas of search for potential growth:

- Land south of Mollison Avenue east of Freezy Water.
- Land within Royal Epping Forest Golf Course north of Chingford.
- Land east of Woodford Green, including parts of Ray Park and Whitbreads Sportsground.
- The eastern half of the Douglas Eyre Playing Fields.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.37 The isolated release and development of the majority of the growth areas in this cluster are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the boroughs of Enfield, Waltham Forest and Redbridge. This includes the isolated release and development of all areas of existing developed and urbanised land in the growth areas, which generally make no more than a moderate contribution to the Green Belt purposes. The same can be said for release and development of the more open and less urbanised strongly contributing Green Belt land, noting that all the locations are already largely contained, limiting their relationship with the wider countryside and therefore impacts on Purpose A (checking the unrestricted sprawl of large built-up areas) and Purpose C (protecting the countryside from encroachment). Most of the growth areas lie within or on the edge of fragile gaps between neighbouring towns; however, their release and development would not result in the physical merging or a significant increase in the perceived merging of neighbouring towns, given their current narrowness in combination with the remaining strong separating features, including dense woodland, roads, waterways and reservoirs. Therefore, their release and development would be unlikely to result in fundamental impacts on Purpose B (prevent neighbouring towns merging into one another).

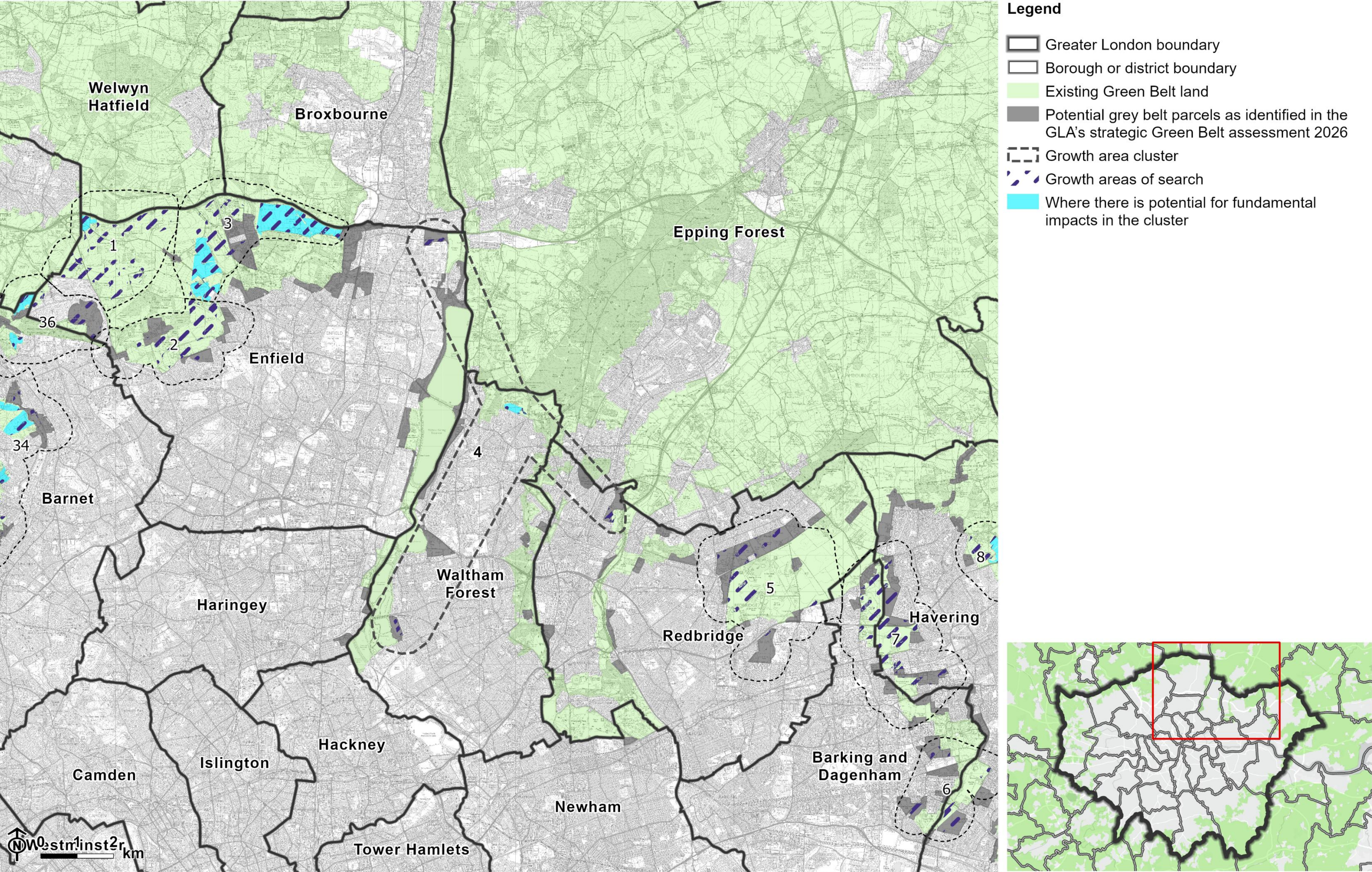
3.38 The potential notable exception involves release and development within the Royal Epping Forest Golf Course north of Chingford, which makes a strong contribution to Purpose D (preserving the setting and special character of historic towns).

3.39 This area contains open undeveloped remnant forest that is an important part of the setting of the historic town of Chingford. Any loss of openness in this location could have a meaningful impact on the ability of the remainder of the boroughs' Green Belt land, to preserve the setting and special character of Chingford. Consequently, this area is identified as having potential for fundamental impacts on Purpose D (preserving the setting and special character of historic towns). It is, however, also acknowledged that some release and development could be in keeping with or even enhance the visual, physical or experiential relationship between remaining open Green Belt land and a historic town. Furthermore, there would continue to be wider open areas of countryside to the north, east and west, around historic Chingford, perhaps limiting the significance of some loss of openness within the golf course on this purpose.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.40 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.5: Assessment of Fundamental Impacts within East Waltham Forest and West Redbridge Growth Area of Search



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Cluster 5 – Fairlop and Hainault

3.41 This potential growth cluster is located in the central northern part of the London Borough of Redbridge.

3.42 The area is made-up of three areas of search for potential growth:

- Land south of Hainault in and around Fairlop, including part of Fairlop Country Park.
- Newbury Park sportsground west of Seven Kings Water.
- Land north of Little Heath.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.43 The release and development of the growth areas in this cluster, both in isolation or in combination, are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. The park sports ground is wholly isolated within the large built-up area. The land south of Hainault, east and west of Fairlop Station is partially developed and/or contained by the urban area to the north and west. The railway line and Forest Road act as regular retaining features that inhibit eastward and/or southern ward sprawl (relevant to Purpose A (checking the unrestricted sprawl of large built-up areas)) and encroachment (relevant to Purpose C (protecting the countryside from encroachment)) in the open countryside of Fairlop Plain beyond. The same cannot be said for the growth area immediately beyond the road and railway line where further growth is more likely to result in a greater sprawling and encroaching impact; however, this portion of the growth area is still relatively contained when compared to the wider countryside in the borough to the east, which would continue to maintain separation between the neighbouring towns of Hainault and Chadwell Heath and inhibit further sprawl and encroachment into the wider countryside. Similarly, the open land north of Little Heath represents a relatively modest extension of the urban area, with the wider open countryside to the north continuing to dominate views and a wider connection to the open countryside to the north east, such that the wider Green Belt within the Fairlop Plain would continue to maintain separation between the neighbouring towns of Hainault and Chadwell Heath (relevant to Purpose B (prevent neighbouring towns

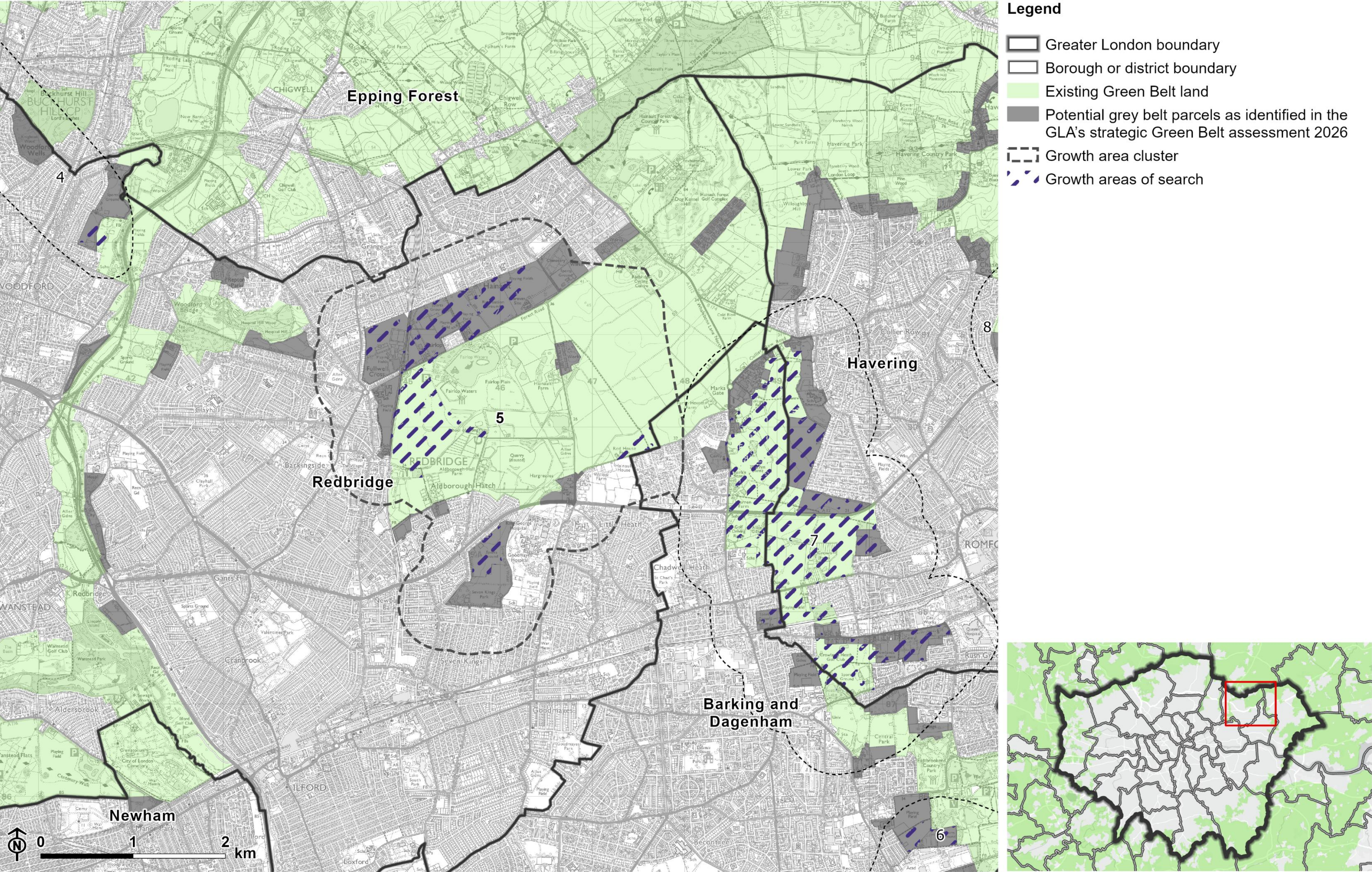
merging into one another)) and inhibit further sprawl and encroachment into the wider countryside.

3.44 With regards to Purpose D (preserving the setting and special character of historic towns), no Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on this purpose.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.45 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.6: Assessment of Fundamental Impacts within Fairlop and Hainault Growth Area of Search



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Cluster 6 – Dagenham, Elm Park and South Hornchurch

3.46 This potential growth cluster is located in the east of the London Borough of Barking and Dagenham and west of the London Borough of Havering.

3.47 The area is made-up of four areas of search for potential growth:

- Goresbrook Cricket Club and the neighbouring playing field.
- The north eastern corner of the Bretons Recreation Ground, contained by the urban edge of Elm Park to the north and east, which is retained by Rainham Road.
- The Leys playing fields east of Ballards Road.
- Land east of the Beam River, north but mainly south of Dagenham Road and largely contained by the urban edge of South Hornchurch and development along the northern side of Dagenham Road.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.48 The release and development of the growth areas in this cluster, both in isolation or in combination, are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. With regards to purposes A (preventing the sprawl of large built-up areas) and B (maintaining separation between neighbouring towns), the areas are all contained within the large built-up area of Greater London and all have some association with adjacent urban edges. Only the south eastern growth area on the land east of the Beam River, north and south of Dagenham Road lies in a fragile gap between neighbouring towns, specifically between Dagenham to the west and South Hornchurch to the east. The two towns are connected via Dagenham Road, which runs through the parcel; however, the existing urbanising influences along the northern side of Dagenham Road limit the significance of further development in this location to a limited degree. Furthermore, the wooded floodplain of the Beam River to the west of this growth area would continue to maintain some separation between the towns.

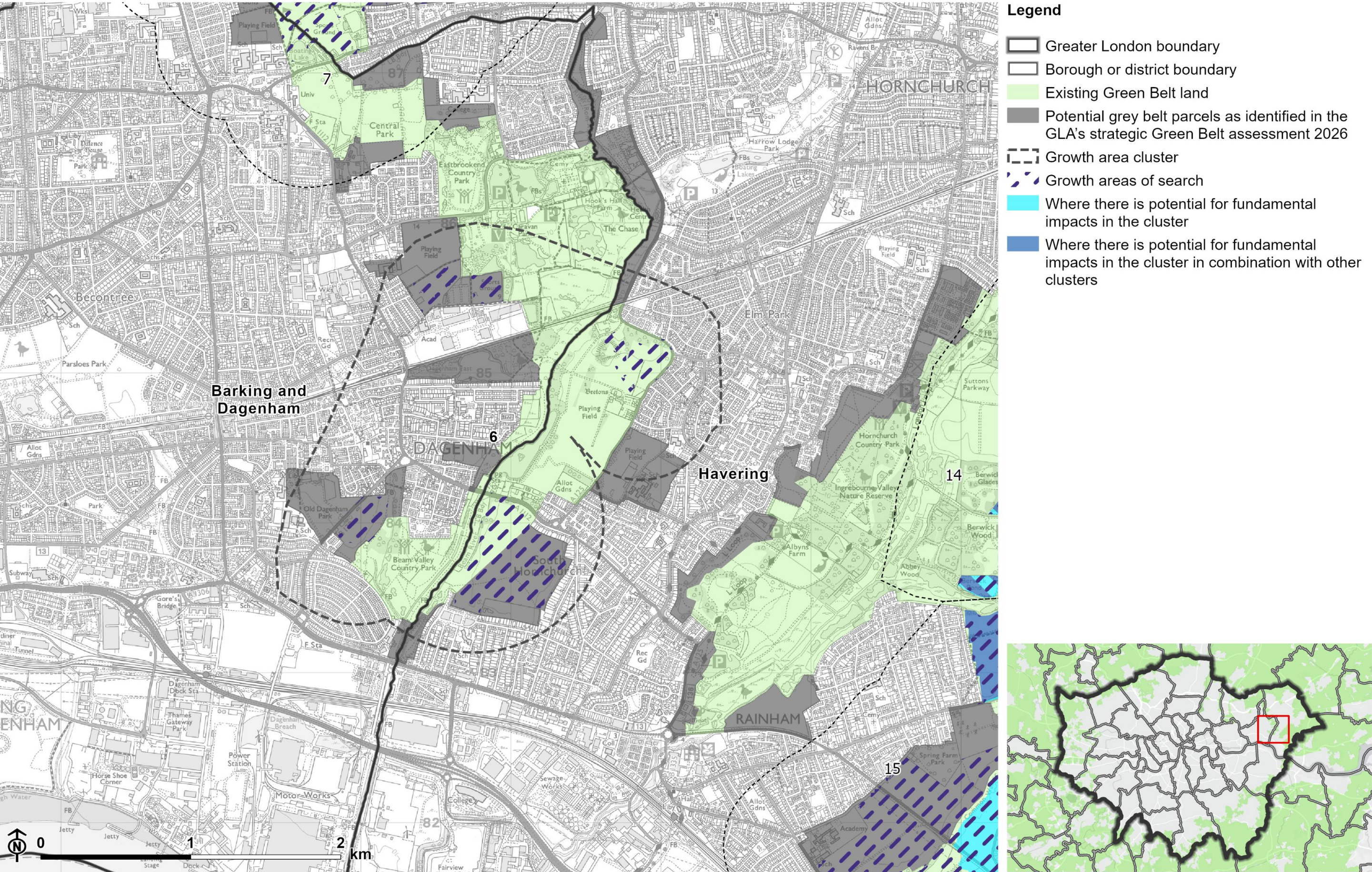
3.49 With regards to Purpose C (assisting in safeguarding the countryside from encroachment), release and development of The Leys playing fields east of Ballards Road would isolate Old Dagenham Park to the west from the wider open countryside to the east, but the area represents a relatively small proportion of the borough's open countryside designated as Green Belt with the vast majority continuing to remain open. Furthermore, the countryside with the immediate wider area, including Old Dagenham Park, is already somewhat disconnected from the wider open countryside surrounding the city to the north.

3.50 With regards to Purpose D (preserving the setting and special character of historic towns), no Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on this purpose.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.51 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.7: Assessment of Fundamental Impacts within Dagenham, Elm Park and South Hornchurch Growth Area of Search



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Cluster 7 – Land in between Chadwell Heath and Collier Row/Romford and Collier Row and Hainault

3.52 This cluster of potential growth areas is located in between Chadwell Heath and Collier Row/Romford along the boundaries of the London Boroughs of Barking and Dagenham and Havering.

3.53 The area is made-up of a large area of search stretching from the open land south of Collier Row Road down to Romford Cemetery and a West Ham Football Club Training Ground, including open farmland, school playing fields, sports pitches and golf courses and allotments.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.54 The release and development of the growth areas in this cluster, both in isolation or in combination, are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. Rather than the remaining Green Belt within the London boroughs of Barking and Dagenham and Havering being undermined further, this is largely because the Green Belt land within this growth cluster has already been undermined to a degree that further impacts would not be fundamental to the Green Belt purposes as a whole.

3.55 With regards to Purpose A (checking the unrestricted sprawl of large built-up areas), the growth areas within the cluster are almost entirely contained within the large built-up area of Greater London. Therefore, release and development in this area is unlikely to result in fundamental impacts on this purpose.

3.56 With regards to Purpose B (preventing neighbouring towns from merging), the majority of the land within the growth area represents the remaining and most substantial parts of the gaps between the neighbouring towns of Chadwell Heath/Dagenham to the west and Collier Row/Romford to the east. However, the neighbouring towns are already almost merged along three of the five connecting roads between them: Collier Row Road in between Chadwell Heath and Collier Row in the north and Crow Lane and Wood Lane in between Chadwell Heath/Dagenham and Romford in the south. Furthermore, much of the Green Belt land in the area already has some visual connection and is urbanised by the containing urban areas.

In addition, it is acknowledged that the wider Green Belt within the boroughs and neighbouring boroughs would also continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of the remaining remnant gaps between towns in these parts of the London Boroughs of Barking and Dagenham and Havering would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole. Consequently, release and development in the growth areas in this cluster would not have a fundamental impact on Purpose B.

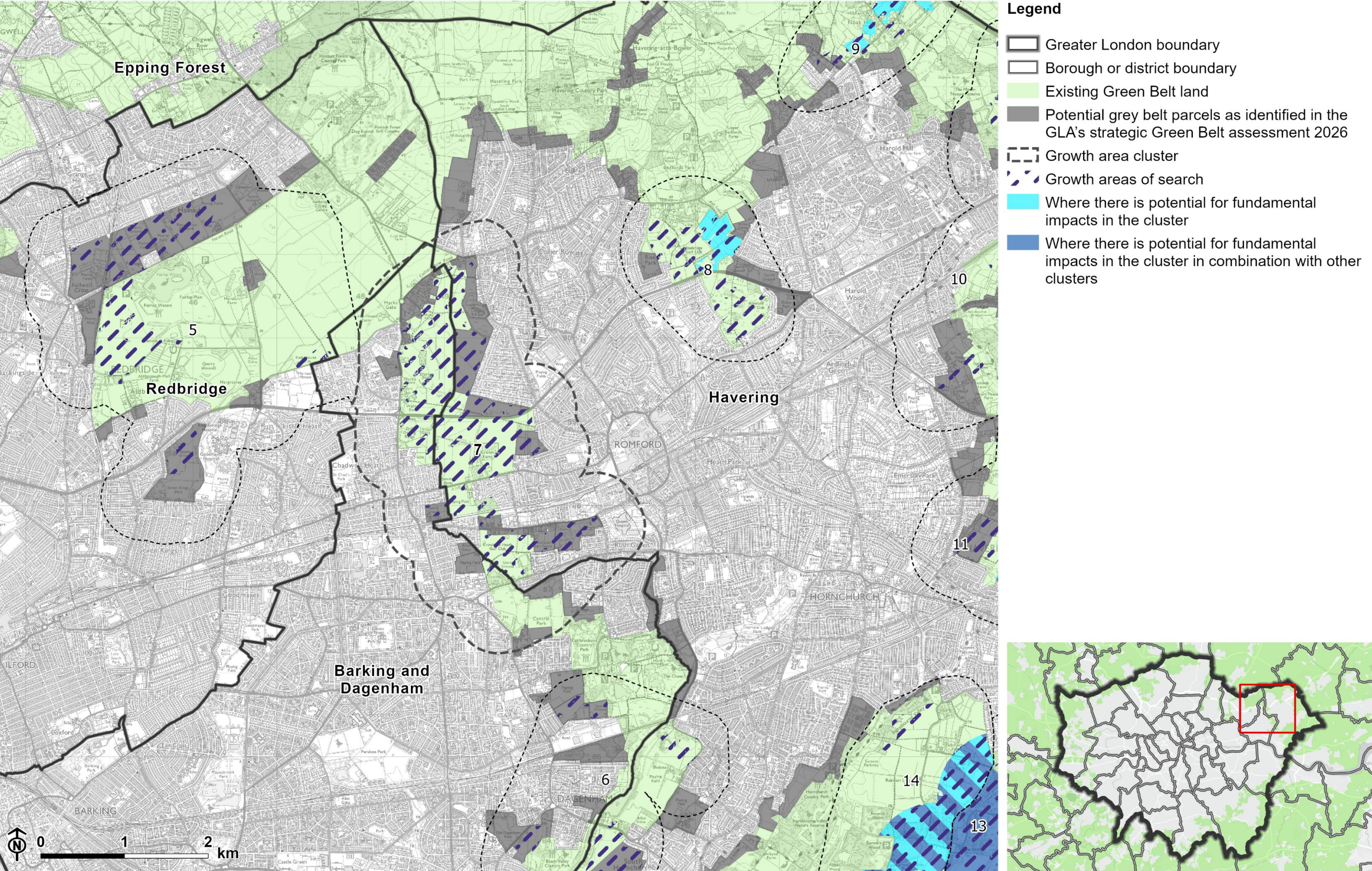
3.57 With regards to Purpose C (assisting in safeguarding the countryside from encroachment), the open countryside within and to the south and west of the growth areas are already notably contained and to some degree urbanised by the surrounding urban areas. Furthermore, existing development along Collier Row Road, Crow Lane and Wood Lane have already significantly truncated and isolated the remaining open countryside to the south of these roads, limiting the potential for fundamental impacts on this purpose within the London Boroughs of Barking and Dagenham and Havering.

3.58 With regards to Purpose D (preserving the setting and special character of historic towns), no Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on this purpose.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.59 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas

Figure 3.8: Assessment of Fundamental Impacts within Land in between Chadwell Heath and Collier Row/Romford and Collier Row and Hainault Growth Area of Search



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Cluster 8 – Risebridge Golf Course

3.60 This area of search for potential growth on Risebridge Golf Course, Romford Golf Course and the western part of Gidea Park is located in between Collier Row and Harold Hill in the north of the London Borough of Havering.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.61 Release and development in the western half of Risebridge Golf Course or south of the A12 in Romford Golf Course are not likely to result in fundamental impacts on the Green Belt purposes. Development in these areas would not represent an incongruous pattern of development because of its existing containment by the urban area. Notably the containing urban area and the ribbon development along Lower Bedfords Road to the north, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas). Similarly, although release and development would likely significantly impact visual separation between the neighbouring towns of Collier Row and Harold Wood, the towns are already merged via Gidea Park Harold Wood and Romford to the south and the remaining separation could be maintained by maintaining openness in the eastern half of Risebridge Golf Course, limiting the potential for fundamental impacts on Purpose B (preventing neighbouring towns from merging). Development in the western half of Risebridge Golf Course would almost wholly isolate Rise Park to the west from the wide countryside to the north and east; however, its existing association with the partially urban area to the west, south and south east in combination with it representing a relatively small part of the borough's countryside limits how meaningful this would be such that this would not be considered to generate fundamental impacts on Purpose C (assisting in safeguarding the countryside from encroachment).

3.62 Release and development up to and including the eastern half of Risebridge Golf Course has some potential to result in fundamental impacts on Purpose B, although there are mitigating circumstances. It would effectively merge the neighbouring towns of Collier Row and Harold Hill along the A127. However, the towns are already indirectly merged via the intervening urban areas of Gidea Park Harold Wood and Romford to the south. Furthermore, it is also acknowledged that the wider Green Belt within the borough would also continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area

would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

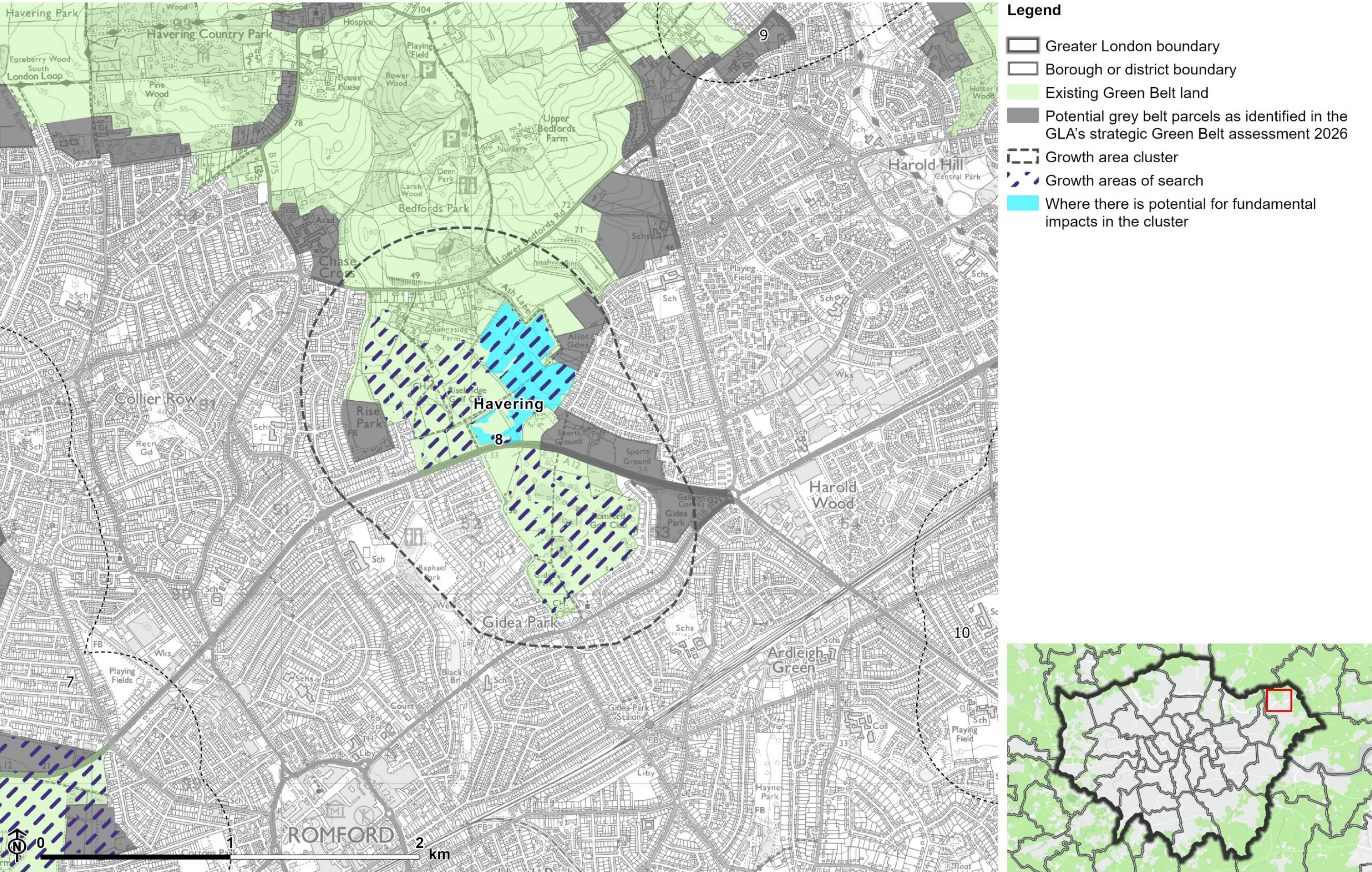
3.63 Release and development up to and including the eastern half of the golf course would effectively sever the open countryside within or around Romford Golf Course and Gidea Park and the neighbouring sports pitches north of the A127 from the wider countryside to the north. However, the likelihood of this resulting in fundamental impacts on Purpose C (assisting in safeguarding the countryside from encroachment) is significantly limited by the fact that the open land to the south is already significantly contained by the surrounding urban area and represents a relatively small part of the borough's countryside overall.

3.64 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.65 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.9: Assessment of Fundamental Impacts within Risebridge Golf Course Growth Area of Search



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Cluster 9 – Noak Hill

3.66 This area of search for potential growth is located in open countryside to the north of Harold Hill in and around the village of Noak Hill along Noak Hill Road in the London Borough of Havering. The neighbouring District of Brentwood lies in close proximity to the north of the growth area cluster beyond the M25.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.67 Release and development of all of the open countryside directly in between the large built-up area of Greater London and the village of Noak Hill and beyond up to the M25 has the potential to have a fundamental impact on Purpose A (checking the unrestricted sprawl of large built-up areas). This would effectively merge Noak Hill with the large built-up area of Greater London, creating a continuous incongruous finger of sprawl up to and beyond the M25 via St Vincent's Hamlet along Weald Road immediately to the north of the M25, weakening the importance of the motorway as retaining physical feature inhibiting the outward sprawl of this part of the city. It should be noted, however, that smaller, more isolated release and development in these parts of the growth area could be delivered without fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas). For example, by maintaining separation between Greater London and Noak Hill and Noak Hill and St Vincent's Hamlet along the connecting Chequers Road and Lower Noke Road.

3.68 The growth area cluster does not lie within any notably fragile gaps between neighbouring towns, so release and development in this location is unlikely to result in fundamental impacts on Green Belt Purpose B (preventing neighbouring towns from merging).

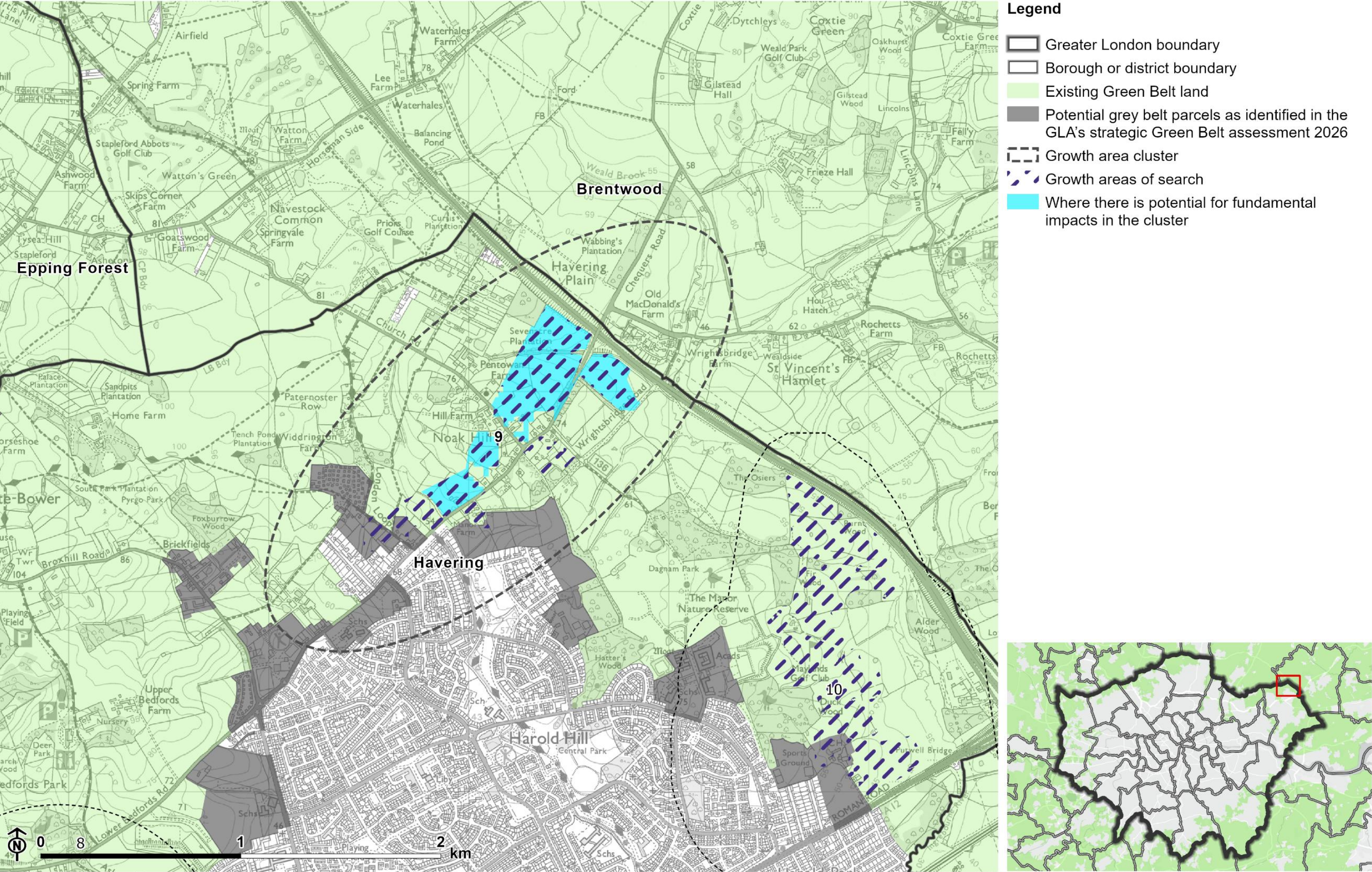
3.69 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would continue to contribute to this purpose.

3.70 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.71 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.10: Assessment of Fundamental Impacts within Noak Hill Growth Area of Search



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Cluster 10 – Harold Park and Harold Wood

3.72 This potential growth cluster is located in the north east of the London Borough of Havering in close proximity to the District of Brentwood located to the east and north east.

3.73 The area is made-up of three areas of search for potential growth:

- Land north of Colchester Road (A12), including Maylands Golf Course.
- Land north of Shepherds Hill Road and at Bleasend Farm.
- Land east and west of Prospect Road and west of the Ingrebourne River.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.74 The release and development of the growth areas in this cluster, both in isolation or in combination, are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan area. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined.

3.75 The release and development of the land north of Colchester Road (A12) would be more incongruous than the current urban form, lying beyond the current retaining woodland blocks to the west nearer to the urban edge of the large built-up area of Greater London; however the M25 and Ingrebourne River to the east would continue to inhibit further eastward and northward sprawl in this location (relevant to Purpose A (checking the unrestricted sprawl of large built-up areas)). The same features would also continue to maintain separation between the neighbouring towns of Harold Hill and Brentwood, limiting the scope for fundamental impacts on Purpose B (preventing neighbouring towns merging into one another).

3.76 The urban edges of Harold Park to the north and Harold Wood to the west partially contain the potential growth areas east and west of the Ingrebourne River and south of the railway line connecting Harold Wood with Brentwood. Furthermore, the existing development along Shepherds Hill Road already represents a notably incongruous finger of ribbon development near the large built-up area of Greater London, generally limiting the impact of further release and development on Purpose A (checking the unrestricted sprawl of large built-up areas) in this location. This area also falls within a robust gap between the neighbouring towns of Cranham and

Brentwood and Cranham and Harold Wood, with wider woodland blocks, rivers and roads maintaining separation to the south and east, generally limiting the potential for fundamental impacts on Purpose B (preventing neighbouring towns merging into one another) in this location.

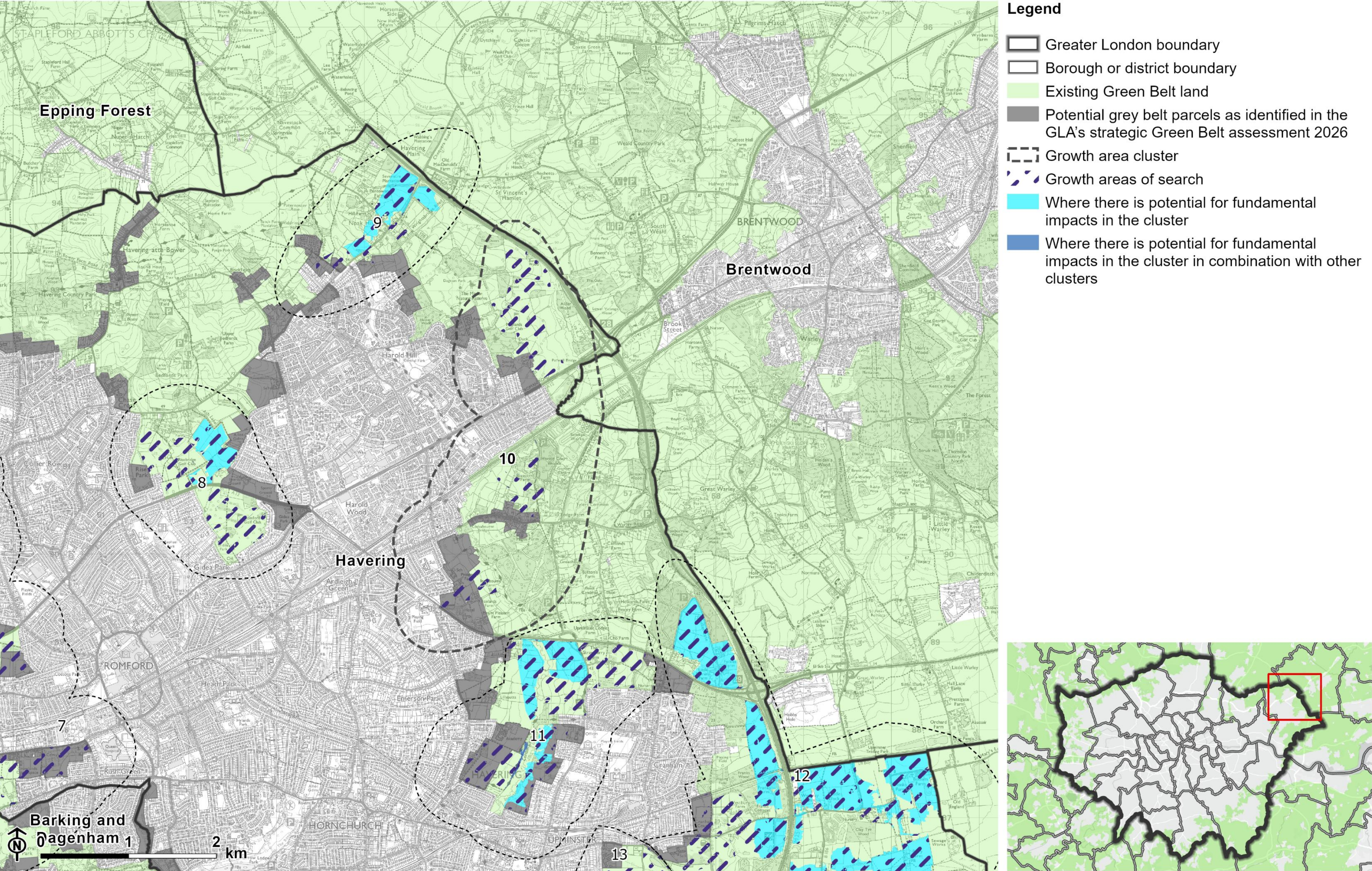
3.77 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would continue to contribute to this purpose.

3.78 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.79 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.11: Assessment of Fundamental Impacts within Harold Park and Harold Wood Growth Area of Search



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Cluster 11 – Land in between Cranham and Emerson Park

3.80 This area of search for potential growth is located in between Cranham and Emerson Park in the London Borough of Havering. It is largely comprised of agricultural fields and woodland blocks either side of the Ingrebourne River but also includes Upminster Golf Course.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.81 Release and development in the cluster would not represent an incongruous pattern of development because of its existing containment by the large built-up area and/or the retaining presence of the A127 to the north, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas).

3.82 Much of the growth areas sits within the fragile gap between the neighbouring towns of Cranham and Emerson Park; however, these neighbouring towns are already indirectly merged via the urban area of Upminster to the south and the treelined River Ingrebourne represents an important separating feature in what remains of the gap between towns. Therefore, release and development of the parts of the growth area cluster that lie either side of the treelined river and are retained by its woodland blocks are unlikely to have a fundamental impact on Purpose B (preventing neighbouring towns from merging).

3.83 Release and development up to and including the more central wooded parts of the fragile gap between towns has some potential to result in fundamental impacts on Purpose B as a result of weakening the role of the river as a separating feature, risking the perceived merging of the neighbouring towns, although more limited release of woodland on only one side of the valley is not likely to have a fundamental impact. The same can be said for release and development of the entirety of the northern part of the growth cluster, containing fewer trees, where there is a risk of the perceived merging of the neighbouring town via the extensions to Hall Lane in the east and Hubbards Close in the west. However, again, the towns are already indirectly merged via the intervening urban area of Upminster to the south and the narrow wooded floodplain would continue to maintain some separation. Furthermore, it is also acknowledged that the wider Green Belt within the borough would also continue to perform a meaningful role in maintaining separation between other

neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

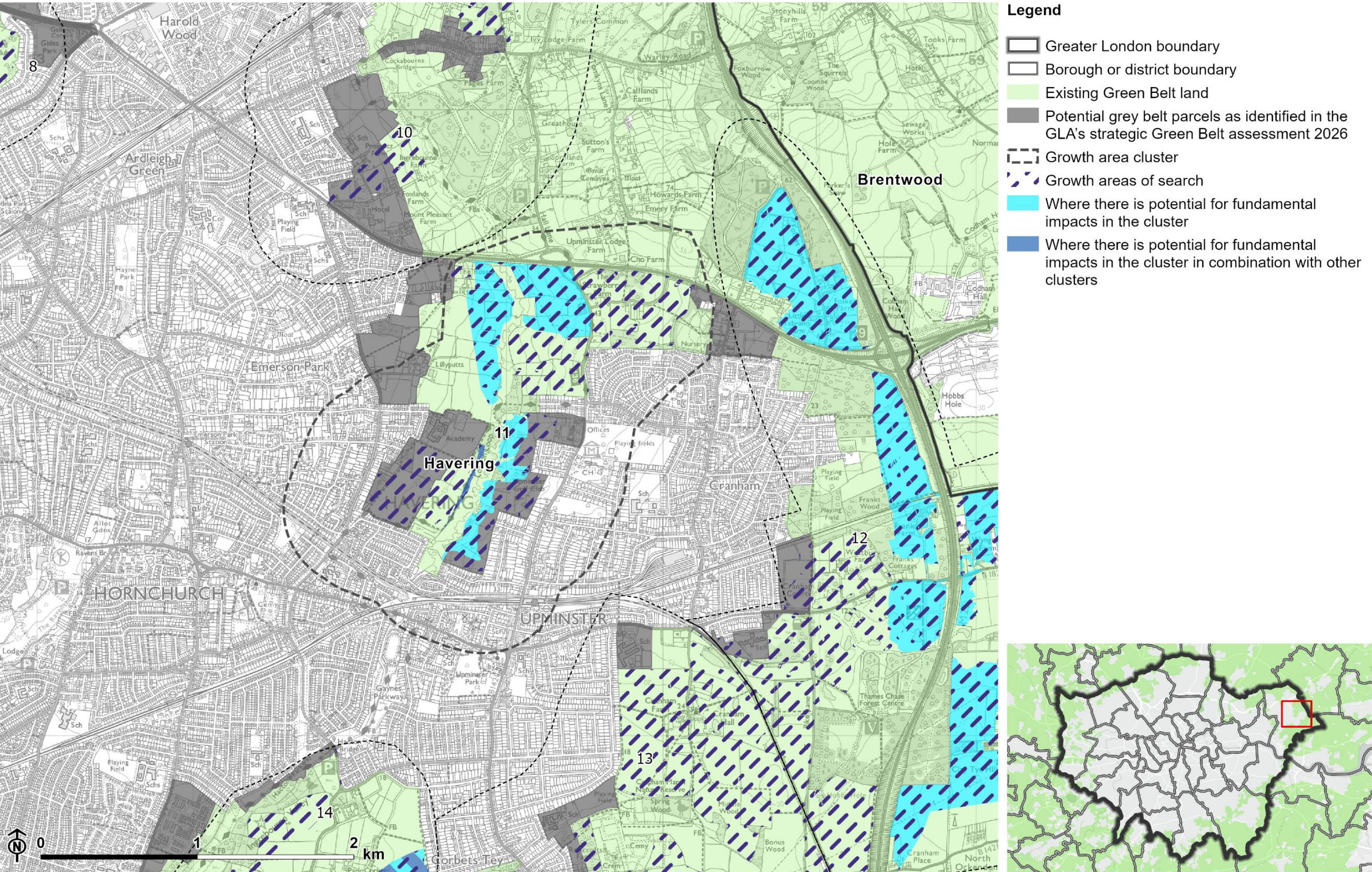
3.84 In addition, release and development of the entirety of the northern part of the growth cluster south of the A127, containing fewer trees, has the potential to result in effectively severing any remaining open countryside to the south west (south of the ribbon development along Hubbards Close) and south from the wider countryside to the north. However, the likelihood of this resulting in fundamental impacts on Purpose C (assisting in safeguarding the countryside from encroachment) is significantly limited by the fact that the treelined River Ingrebourne would likely continue to maintain a physical connection and this open countryside represents a relatively small part of the borough's countryside overall.

3.85 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.86 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.12: Assessment of Fundamental Impacts within Land in between Cranham and Emerson Park Growth Area of Search



Cluster 12 – Land east of Upminster and Cranham

3.87 This area of search for potential growth is located to the north east and east of Cranham and Upminster. The neighbouring boroughs of Brentwood and Thurrock lie directly to the north east and south east respectively. It is largely comprised of agricultural fields and woodland blocks, including large parts of Thames Chase Forest. The area also includes disparate sparse clusters of residential and commercial development along Folkes Lane, St Marys Lane and Clay Tye Road, as well as Warley Substation and Cranham Golf Course.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.88 Release and development of the open countryside directly in between the large built-up area of Greater London (via the washed over development within the Green Belt) and the industrial and commercial land uses beyond the M25 to the east has the potential to have a fundamental impact on Purpose A (checking the unrestricted sprawl of large built-up areas). The merging of these two urban areas would effectively create a continuous (but for the motorway) incongruous finger of sprawl up to and beyond the M25 along routes vulnerable to ribbon development and further incongruous eastward sprawl, weakening the importance of the motorway as retaining physical feature inhibiting the outward sprawl of this part of the city. It should be noted, however, that smaller, more isolated release and development in these parts of the growth area could be delivered without fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas). For example, by maintaining separation between Greater London and the industrial and commercial land uses east of the motorway.

3.89 The growth area cluster does not lie within any notably fragile gaps between neighbouring towns, so release and development in this location is unlikely to result in fundamental impacts on Green Belt Purpose B (preventing neighbouring towns from merging). Development of the growth areas in their entirety would significantly narrow the gap between the neighbouring towns of Cranham/Upminster and Basildon along the connecting railway line and A127 road. In particular, consolidation and expansion of the existing urbanising influences east of the M25 would have a notable knock-on effect on the wider gap between towns to the east; however, open land would still remain between the neighbouring towns, maintaining their separation. Furthermore, it is also acknowledged that the wider Green Belt within the borough and neighbouring boroughs of Basildon, Brentwood and Thurrock would also

continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the significant narrowing of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan areas as a whole.

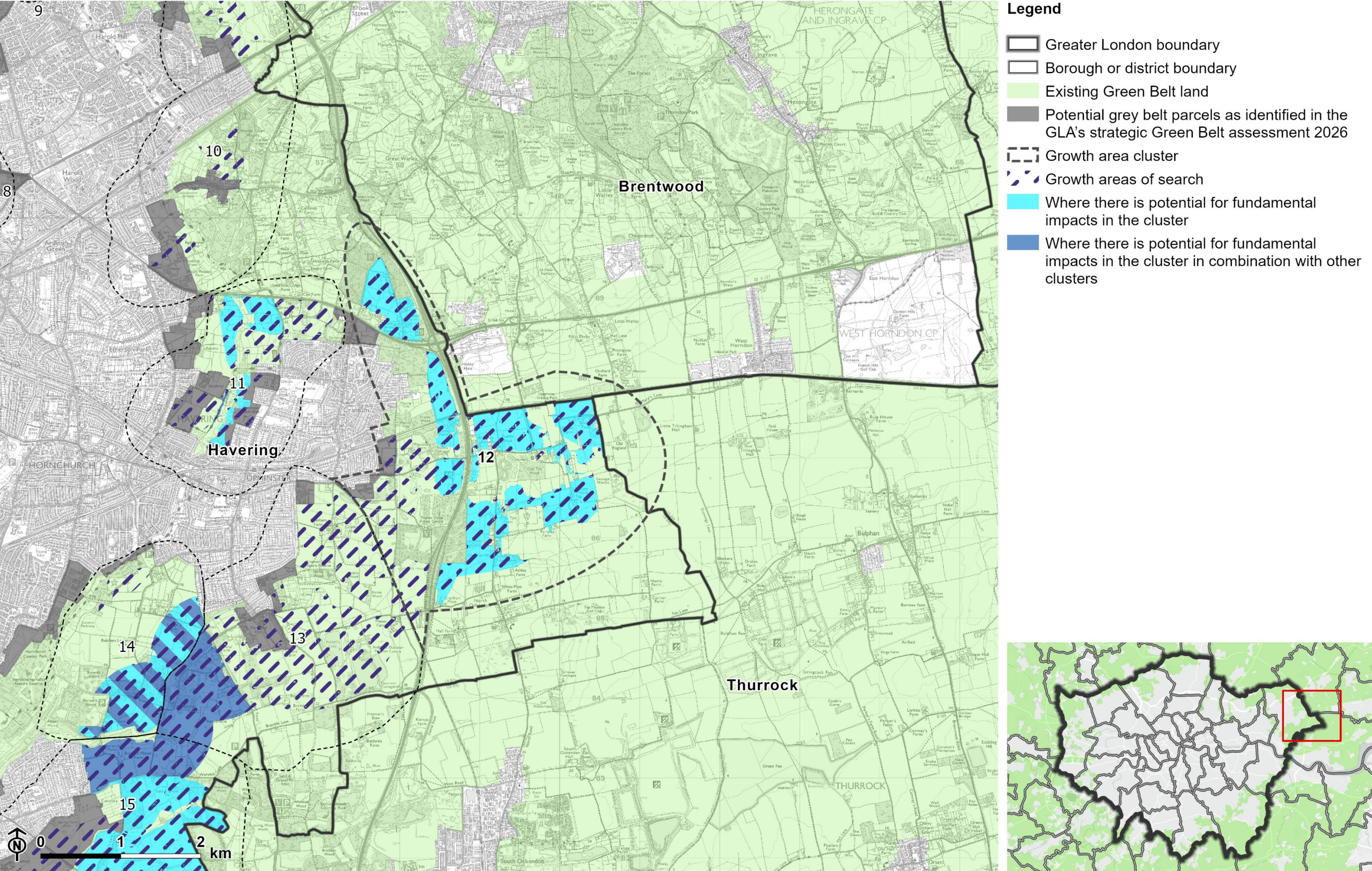
3.90 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would likely largely continue to contribute strongly to this purpose.

3.91 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.92 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.13: Assessment of Fundamental Impacts within Land east of Upminster and Cranham Growth Area of Search



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Cluster 13 – Corbets Tey

3.93 This area of search for potential growth is located in the south east of the London Borough of Havering. The neighbouring district of Thurrock lies close to the south eastern extent of the area.

3.94 The area is made-up of a single large area of search for potential growth located to the south and east of Corbets Tey and merged with Upminster to the north. The neighbouring town of Rainham, also within the London Borough of Havering, lies to the south west.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.95 The release and development of the growth area in this cluster is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined.

3.96 Release and development of the growth area in its entirety would:

- Represent a significant urban extension out into the open countryside. It would be notably more incongruous than the current urban form, but not a meaningful enough difference to represent a fundamental impact on Purpose A (checking the unrestricted sprawl of large built-up areas).
- It would significantly narrow the gap between the neighbouring towns of Upminster and Rainham but the Berwick Ponds and Woodland and the open countryside beyond to the west and south could continue to main separation such that there would not be a fundamental impact on Purpose B (preventing neighbouring towns merging into one another).
- It would significantly contain and isolate the open countryside to the west (comprised of the Berwick and Thames Chase Woodlands, Hornchurch Country Park and wider Ingrebourne Valley within the London Borough of Havering) from the wider open countryside to the east and south, although some connection would remain via the Berwick Ponds and the open countryside beyond. Similarly, it could isolate smaller pockets of open countryside in between the growth area and the existing urban edges of Corbets Tey and Upminster. However, in both cases, these areas of open countryside represent

relatively small proportions of the borough's open countryside designated as Green Belt with the vast majority continuing to remain open and connected to the wider open countryside. These factors reduce the potential for fundamental impacts on Purpose C (protecting the countryside from encroachment).

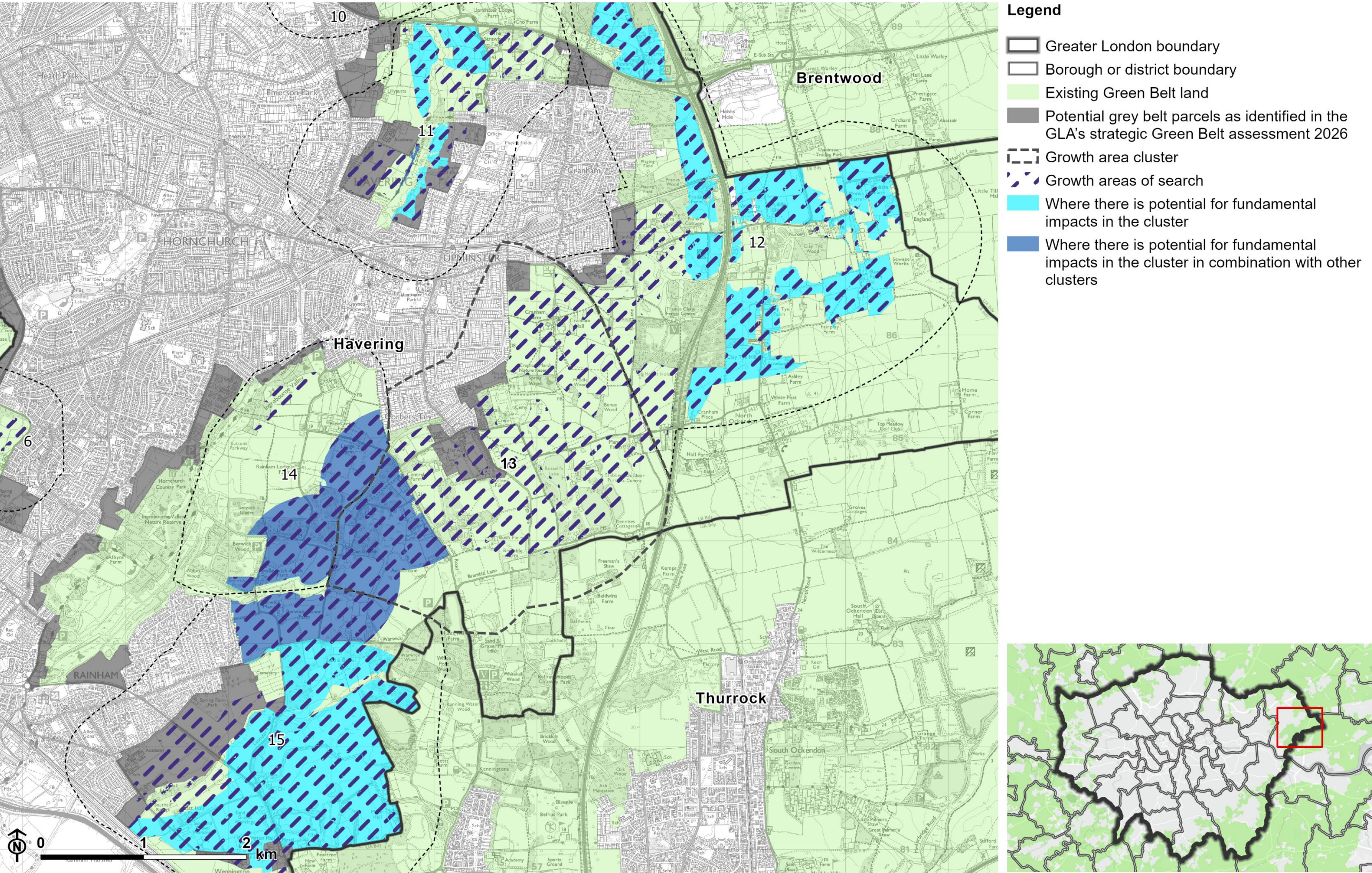
- The open Green Belt land immediately to the south of Corbets Tey forms part of the wider setting of the historic town of Upminster, making a moderate contribution to Purpose D (preserving the setting and special character of historic towns). However, there are no important visual, physical, or experiential relationships to historic aspects of the historic town of Upminster, limiting the potential for meaningful fundamental impacts on this Green Belt purpose in this location.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.97 The release and development of growth area cluster 13 (Corbets Tey) in combination with the eastward expansion of Rainham in clusters 14 (Berwick Ponds and Woods) and 15 (South East of Rainham) has the potential to result in the merging of the neighbouring towns of Upminster and Rainham. This has the potential to have a fundamental impact on Purpose B (preventing neighbouring towns merging into one another). Although, it is acknowledged that the wider Green Belt within the borough and neighbouring district would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

3.98 The same combined release and development scenario would also sever the currently strongly contributing open countryside within the Hornchurch Country Park and wider Ingrebourne Valley to the west (all within the London Borough of Havering) from the wider open countryside to the east and south. The isolation of this area has the potential to result in fundamental impacts on Purpose C (protecting the countryside from encroachment). However, the likelihood of this is somewhat limited, not least because this area represents a relatively small proportion of the borough's open countryside designated as Green Belt with the vast majority continuing to remain open and connected to the wider open countryside.

Figure 3.14: Assessment of Fundamental Impacts within Corbets Tey Growth Area of Search



Cluster 14 – Berwick Pond and Woods

3.99 This potential area of search for potential growth is located in between Hornchurch to the west, Rainham to the south west and Upminster to the north east in the London Borough of Havering. The area is largely comprised of open countryside, including woodland blocks and ponds associated with Berwick Wood and Glades and open land east of Ingrebourne River.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.100 The release and development of the entirety of the larger southern growth area in this cluster, stretching from the south western urban edge of Corbets Tey to in the north to the Berwick Ponds in the south has the potential to result in fundamental impacts on Purposes B (preventing neighbouring towns from merging) and C (assisting in safeguarding the countryside from encroachment). It would result in the perceived merging of the neighbouring towns of Upminster and Rainham (relevant to Purpose B) and the significant containment and isolation of the open countryside to the west comprised of the Hornchurch Country Park and wider Ingrebourne Valley within the London Borough of Havering (relevant to Purpose C) – both but for a relatively thin strip of water bodies at the Berwick Ponds to the south and a small block of woodland to the west. There are, however, mitigating factors that reduce the potential for fundamental impacts of these purposes. With regards to Purpose B, it is acknowledged that the wider Green Belt within the borough and would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole. With regards to Purpose C, the area represents a relatively small proportion of the borough's open countryside designated as Green Belt with the vast majority continuing to remain open and connected to the wider open countryside. Release of smaller portions of the growth area to maintain separation between towns and the connection of the countryside to the west with the wider countryside to the east would likely not generate the same impacts.

3.101 The same cannot be said for release and development in the smaller northern portion of the growth area cluster located immediately to the east of the River Ingrebourne, which represents a more discrete urban extension. Woodland and the open countryside beyond to the west and south could continue to main separation

such that there would not be a fundamental impact on Purpose B (preventing neighbouring towns merging into one another).

3.102 Release and development in the cluster would not represent an incongruous pattern of development because of the area's wider containment by the large built-up area, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas).

3.103 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

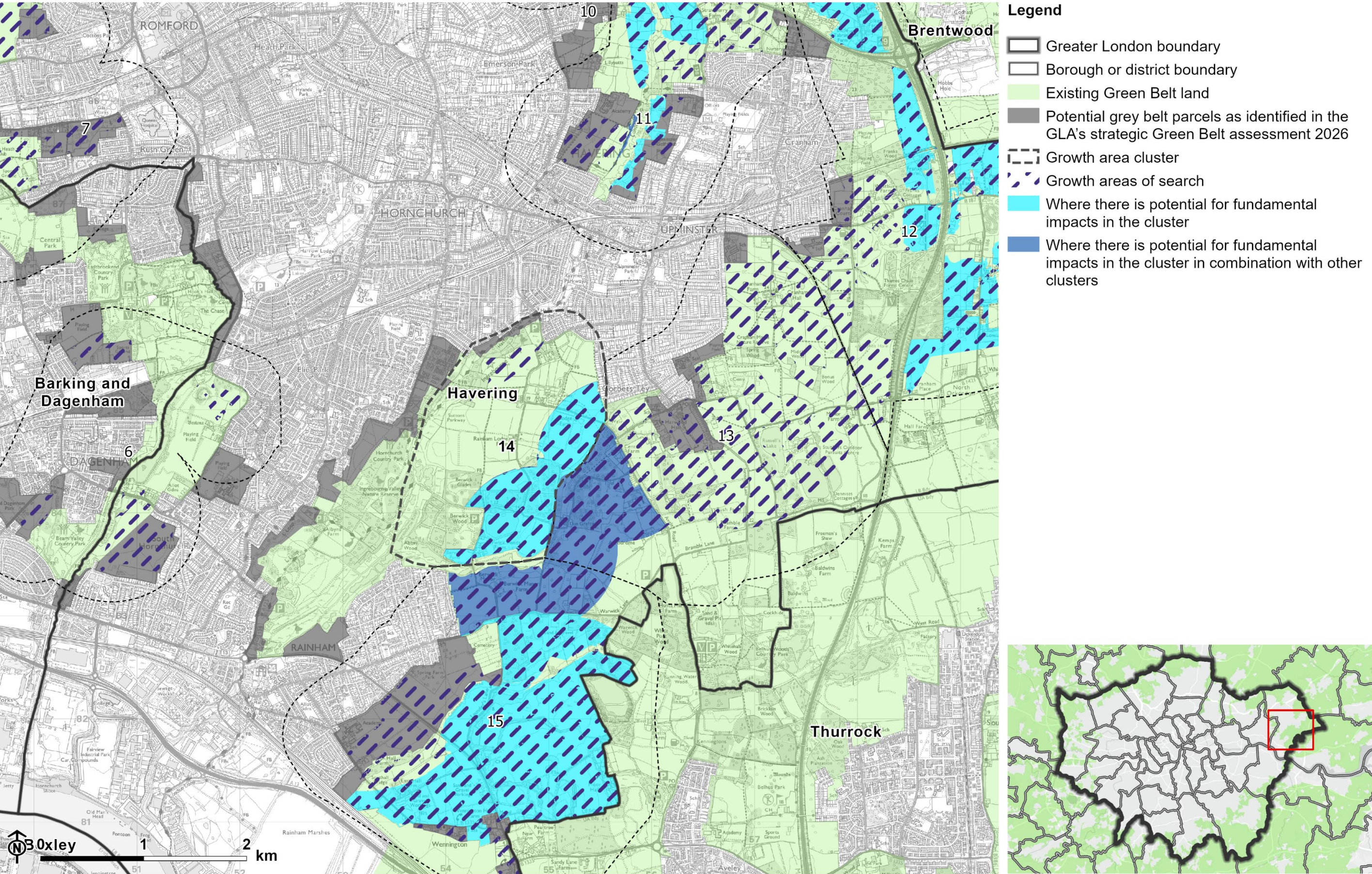
Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.104 The release and development of growth area cluster 13 (Corbets Tey) in combination with the north east expansion of Rainham in clusters 14 (Berwick Ponds and Wood) and 15 (South East of Rainham) has the potential to result in similar fundamental impacts to these described above.

3.105 The physical or perceived merging of the neighbouring towns of Upminster and Rainham has the potential to have a fundamental impact on Purpose B (preventing neighbouring towns merging into one another). Although, it is acknowledged that the wider Green Belt within the borough and neighbouring district would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

3.106 Again, the same combined release and development scenario would also sever the currently strongly contributing open countryside within the Hornchurch Country Park and wider Ingrebourne Valley to the west (all within the London Borough of Havering) from the wider open countryside to the east and south. The isolation of this area has the potential to result in fundamental impacts on Purpose C (protecting the countryside from encroachment). However, again, the likelihood of this is somewhat limited, not least because this area represents a relatively small proportion of the borough's open countryside designated as Green Belt with the vast majority continuing to remain open and connected to the wider open countryside.

Figure 3.15: Assessment of Fundamental Impacts within Berwick Pond and Woods Growth Area of Search



Cluster 15 – South east of Rainham

3.107 This area of search for potential growth is located to the south east of Rainham around Wennington and along New Road in the London Borough of Havering, and lies directly adjacent to the District of Thurrock to the south east. The area is comprised of agricultural fields, woodland blocks, a number of sand and gravel workings, Ingrebourne Golf Course and Arnold's Field, a former landfill site.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.108 The isolated release and development of the majority of the growth area in this cluster has the potential to fundamentally undermine purposes A (checking the unrestricted sprawl of large built-up areas) and B (preventing neighbouring towns from merging) within the London Borough of Havering. Eastward sprawl along the southern side of Upminster Road North/Warwick Lane up the eastern edge of the borough, where the floodplain of the Common water course narrows most, in combination with the wider growth area to the south beyond the watercourse to Wennington and beyond would result in an almost continuous incongruous pattern of development to the large built-up area of Grays via the intervening existing ribbon development along New Road (A1306) and the Purfleet Industrial Estate. In addition to the scale of the sprawl and the potential assimilation of the Grays large built-up area into the large built up of Greater London (relevant to Purpose A), this scale would also result in the perceived merging of the neighbouring towns of Grays and Rainham (relevant to Purpose B).

3.109 There are, however, mitigating factors that reduce the potential for fundamental impacts of these purposes. With regards to Purpose A and B, it is acknowledged the form of the growth area is notably truncated by the floodplain of the Common Watercourse and the A3 to the south maintains some separation between the growth area and the large built-up area of Grays (via Aveley). Also, with regards to Purpose B, it is acknowledged that the wider Green Belt within the borough and neighbouring district of Thurrock would also continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

3.110 The same cannot be said for release and development in the smaller northern portion of the growth area cluster immediately south of Rainham and north of the

Common Watercourse where the water course in combination with the high ground of Arnold's Field help to restrict and contain development in this more discrete location. Similarly, release of smaller portions of the growth area south of the Common Watercourse that would maintain separation between Rainham and Wennington and the development to the south east would likely not generate the fundamental impacts.

3.111 Release and development of Green Belt land in this growth area cluster could significantly contain and isolate the open countryside in between the growth area and the existing urban edge of Rainham. However, these areas of open countryside represent relatively small proportions of the borough's open countryside designated as Green Belt with the vast majority continuing to remain open and connected to the wider open countryside. Furthermore, the land uses in these locations – Harris Academy playing fields, Spring Farm Park and Rainham Park – have a notable association with the urban area already. These factors reduce the potential for fundamental impacts on Purpose C (protecting the countryside from encroachment).

3.112 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

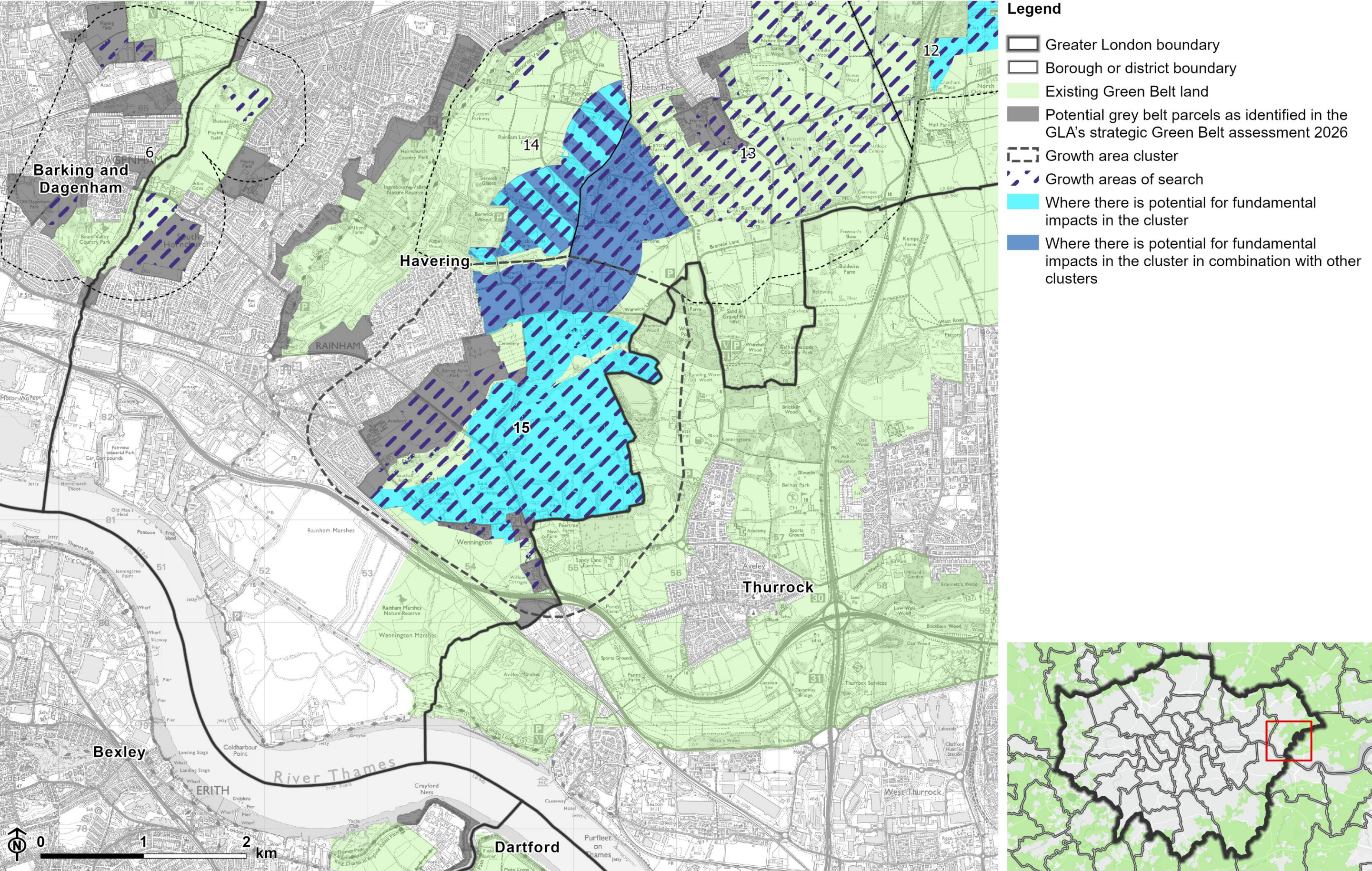
Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.113 The release and development of growth area cluster 13 (Corbets Tey) in combination with the eastward expansion of Rainham in clusters 14 (Berwick Ponds and Woods) and the northern portion of this cluster (15 – South East of Rainham) north of Upminster Road North/Warwick Lane has the potential to result in the merging of the neighbouring towns of Upminster and Rainham. This has the potential to have a fundamental impact on Purpose B (preventing neighbouring towns merging into one another). Although, it is acknowledged that the wider Green Belt within the borough and neighbouring district would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

3.114 The same combined release and development scenario would also sever the currently strongly contributing open countryside within the Hornchurch Country Park

and wider Ingrebourne Valley to the west (all within the London Borough of Havering) from the wider open countryside to the east and south. The isolation of this area has the potential to result in fundamental impacts on Purpose C (protecting the countryside from encroachment). However, the likelihood of this is somewhat limited, not least because this area represents a relatively small proportion of the borough's open countryside designated as Green Belt with the vast majority continuing to remain open and connected to the wider open countryside.

Figure 3.16: Assessment of Fundamental Impacts within South east of Rainham Growth Area of Search



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Cluster 16 – Land in between Coldblow, Dartford, Old Bexley and Foots Cray

3.115 This potential growth cluster is located in between Coldblow, Dartford, Old Bexley and Foots Cray in the London Borough of Bexley and directly abuts the neighbouring District of Dartford to the south east.

3.116 The area is made-up of three areas of search for potential growth:

- The open countryside in between Old Bexley and Coldblow, including scrubland and woodland.
- Bexley playing field and padel club south of Old Bexley and north of the River Cray.
- Land west and north of North Cray Road within and to the north of the village of North Cray, including Stable Meadow sports ground.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.117 The release and development of the open land immediately north east of Vicarage Road in between Coldblow (merged with Joyden's Wood) and Old Bexley is most likely to result in fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas). The merging of the two urban areas would notably increase their combined sprawling influence to the south east towards Hextable and Swanley. Although Coldblow and Joyden's Wood already represent a relatively incongruous finger of urban development their merging with the Greater London would elevate this, increasing the fragility of the open countryside in between Joydon's Wood and Hextable and Swanley. The wider open countryside in the growth area immediately to the north of the central portion of this gap also has some potential to have a fundamental impact on this purpose for the same reasons. Although isolated development in these areas would not result in the physical merging of the urban areas, development in these areas could result in the perception of Greater London having assimilated the neighbouring satellite settlements with similar fundamental impacts on this purpose.

3.118 Release and development of the growth area that spans the majority of the open length of the North Cray Road has some potential to have fundamental impacts on Purpose B (preventing neighbouring towns from merging). In combination with areas of washed over development to the south along Gattons Way, development of

the open areas in and around the village of North Cray could effectively merge the neighbouring towns of Bexleyheath (via Old Bexley) with Orpington (via Foots Cray) but for a thin band of woodland along the floodplain of the River Cray. It is noted, however, that the towns are already indirectly merged via intervening development to the west in Sidcup, limiting the significance of further merging to some degree. It is also acknowledged that the wider Green Belt within the borough and neighbouring plan areas would also continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole. Release and development of more isolated pockets along North Cray Road that would maintain physical and perceived separation would be less likely to result in fundamental impacts on this purpose.

3.119 Release and development of the areas of growth immediately north west North Cray Road have the potential to have fundamental impacts on Purpose C (assisting in safeguarding the countryside from encroachment). Development in these locations have the potential to almost sever and isolate large areas of open countryside to the west and east from the wider countryside to the south east. However, the likelihood of this is somewhat limited, not least because in isolation these areas represent relatively small proportions of the borough's open countryside designated as Green Belt with the vast majority continuing to remain open and connected to the wider open countryside.

3.120 Release and development in the open parts of the Old Bexley Conservation Area designated as Green Belt has the potential to have a fundamental impact on Purpose D (preserving the setting and special character of historic towns). Old Bexley forms part of the special character of the historic town of Bexleyheath and therefore the open countryside that immediately surrounds Old Bexley is important to its setting. Therefore, any loss of openness in these areas could have a meaningful impact on the ability of the remainder of the London Borough of Bexley's Green Belt land, to preserve the setting and special character of the historic town of Bexleyheath. It is, however, also acknowledged that some release and development could be in keeping with or even enhance the visual, physical or experiential relationship between remaining open Green Belt land and a historic town. The wider open areas along the valley of the River Cray and its floodplain form part of its wider setting and therefore make a more moderate contribution to this purposes. Therefore, release and development areas are less likely to result in fundamental impacts on this purpose.

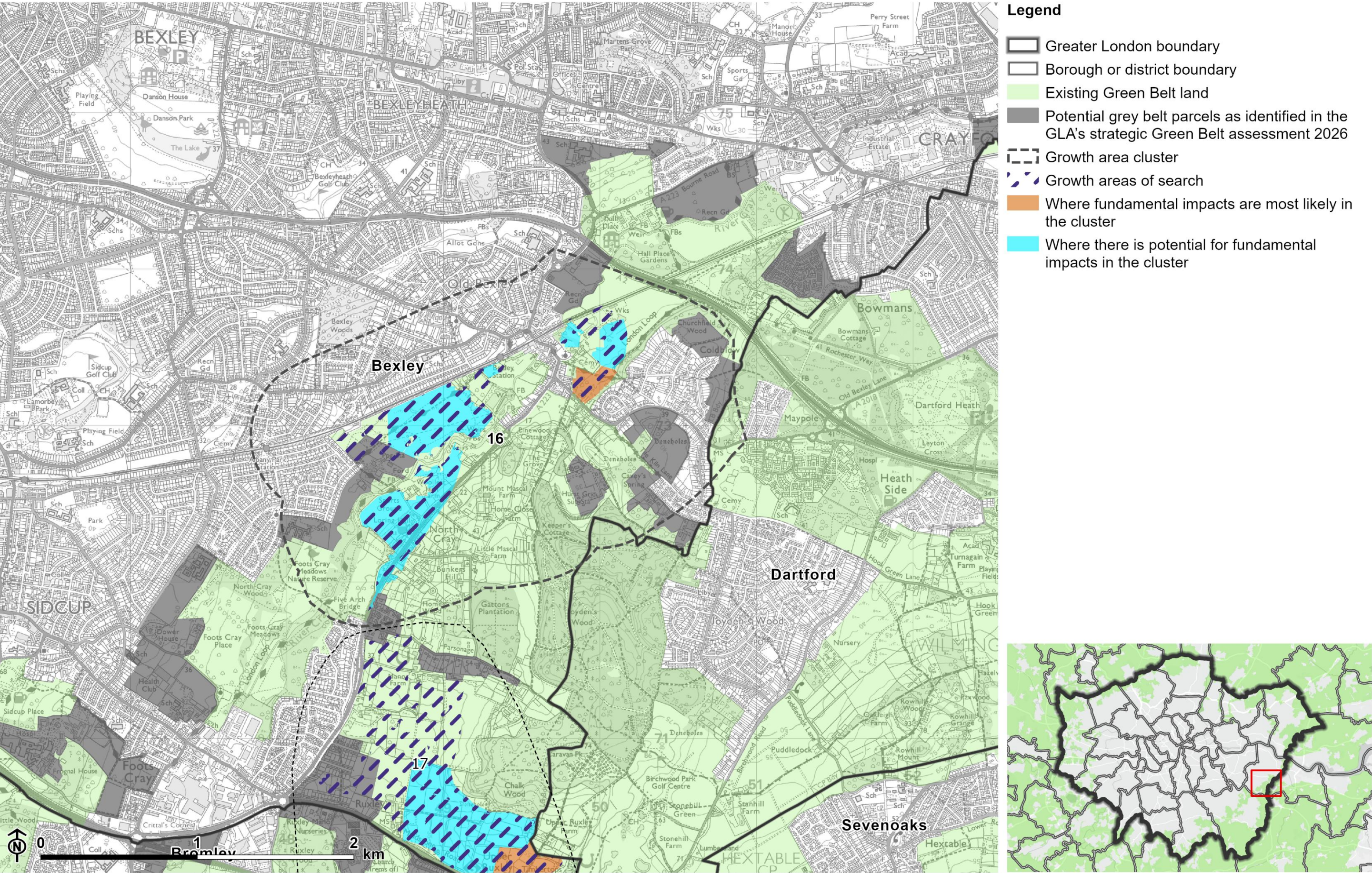
3.121 The isolated release and development of the more contained, urbanised or developed parts of the growth areas in this cluster are unlikely to fundamentally

undermine the purposes (taken together) of the remaining Green Belt across the borough and neighbouring plan areas. These areas generally make no more than a moderate contribution to the Green Belt purposes.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.122 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.17: Assessment of Fundamental Impacts within Land in between Coldblow, Dartford, Old Bexley and Foots Cray Growth Area of Search



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Cluster 17 – Land in between Foots Cray, Orpington and Swanley

3.123 This potential growth cluster is centred on areas for potential growth that straddle and lie in close proximity to the boundary of the London boroughs of Bexley and Bromley. The potential growth cluster is located in between Foots Cray, Orpington and Swanley, north and south of the A20 in the London Boroughs of Bexley and Bromley. The neighbouring districts of Dartford and Sevenoaks lie directly to the east.

3.124 The area is made-up of two areas of search for potential growth:

- An area of potential for development stretching from the eastern edge of Foots Cray south in between and across Ruxley and Upper Ruxley and beyond the A20 to Hockenden and the western edge of Swanley. This area is largely comprised of open agricultural fields, some ribbon development along Maidstone Road and part of Orpington Golf Course.
- An area of potential for development in between Orpington and Swanley north and south of the railway line connecting the two neighbouring towns. The area is largely comprised of open agricultural fields, woodland blocks, part of Orpington Golf Course and St Pauls Cray Hill Country Park.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.125 The isolated release and development of all areas of existing developed and urbanised land in the growth area, which generally make no more than a moderate contribution to the Green Belt purposes are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the boroughs or the neighbouring districts. The same can be said for release and development of the more open and less urbanised strongly contributing Green Belt land that could not result in the merging of Sidcup (via Foots Cray, Ruxley and Upper Ruxley) and Swanley and Orpington and Swanley. This includes the open Green Belt land immediately north of the Ruxley Manor Garden Centre and north west of Chalk Wood and the land west and south west of Hockenden Wood.

3.126 The release and development of the open land further to the south east, including Joyden's Meadows and the open pockets in between the built development along Maidstone Road and Old Maidstone Road has the potential to result in a

fundamental impact on Green Belt Purpose A (checking the unrestricted sprawl of large built-up areas). Consolidation and expansion of the existing ribbon development along the roads from the large built-up area at Foots Cray towards Swanley would create a notably more incongruous finger of eastward sprawl on scale not seen elsewhere in the London Boroughs of Bexley and Bromley.

3.127 The release and development of the open land up to and further to the south and east is most likely to result in fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas) and Purpose B (preventing neighbouring towns from merging). This land is currently maintaining separation between the neighbouring towns of Sidcup (via Foots Cray, Ruxley and Upper Ruxley) and Swanley along the key connecting roads between the settlements. The merging of the neighbouring towns of Sidcup (via Foots Cray, Ruxley and Upper Ruxley) and Swanley would create a new and much more significant incongruous finger of urban sprawl of a scale not seen elsewhere in the London Boroughs of Bexley and Bromley. With regards to the London Borough of Bromley, it is acknowledged that the wider Green Belt within the borough also and would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole on Purpose B. The same cannot be said for the London Borough of Bexley, however, where the open countryside to the north of Maidstone Road and Old Maidstone Road represents the main gap between separate towns in the borough, increasing the risk of fundamental impacts on Purpose B in the London Borough of Bexley.

3.128 Similarly, further to the south, the open land immediately west of Hockenden Lane and Cookham Road represents the central portion of the wider gap between the neighbouring towns of Orpington and Swanley. The merging of these two neighbouring towns up to and including the central core of the gap is equally likely to result in fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas) and Purpose B (preventing neighbouring towns from merging) for the same reasons outlined above. However, again, as all this land lies within the London Borough of Bromley, it is acknowledged that the wider Green Belt within the borough would also continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole on Purpose B.

3.129 The wider parts of the open countryside to the west and south of this central core of the gap between Orpington and Swanley also have some potential to result in

fundamental impacts on the same purposes for similar reasons. These areas represent equally central parts of the wider gap between towns and each lie in view of the connecting roads and railway line between them; however, it is also acknowledged that the woodland blocks outside of the growth area at Bourne Wood and Hockenden Wood and in Orpington Golf Course to the north maintain some separation between the towns in these locations. Similarly, the open land south of Bourne Wood and west and north of Crockenhill in the neighbouring district of Sevenoaks maintains wider separation between the neighbouring towns south of the railway line, although the village of Crockenhill and development along Crockenhill road already have some narrowing influence on the wider gap between towns in this area.

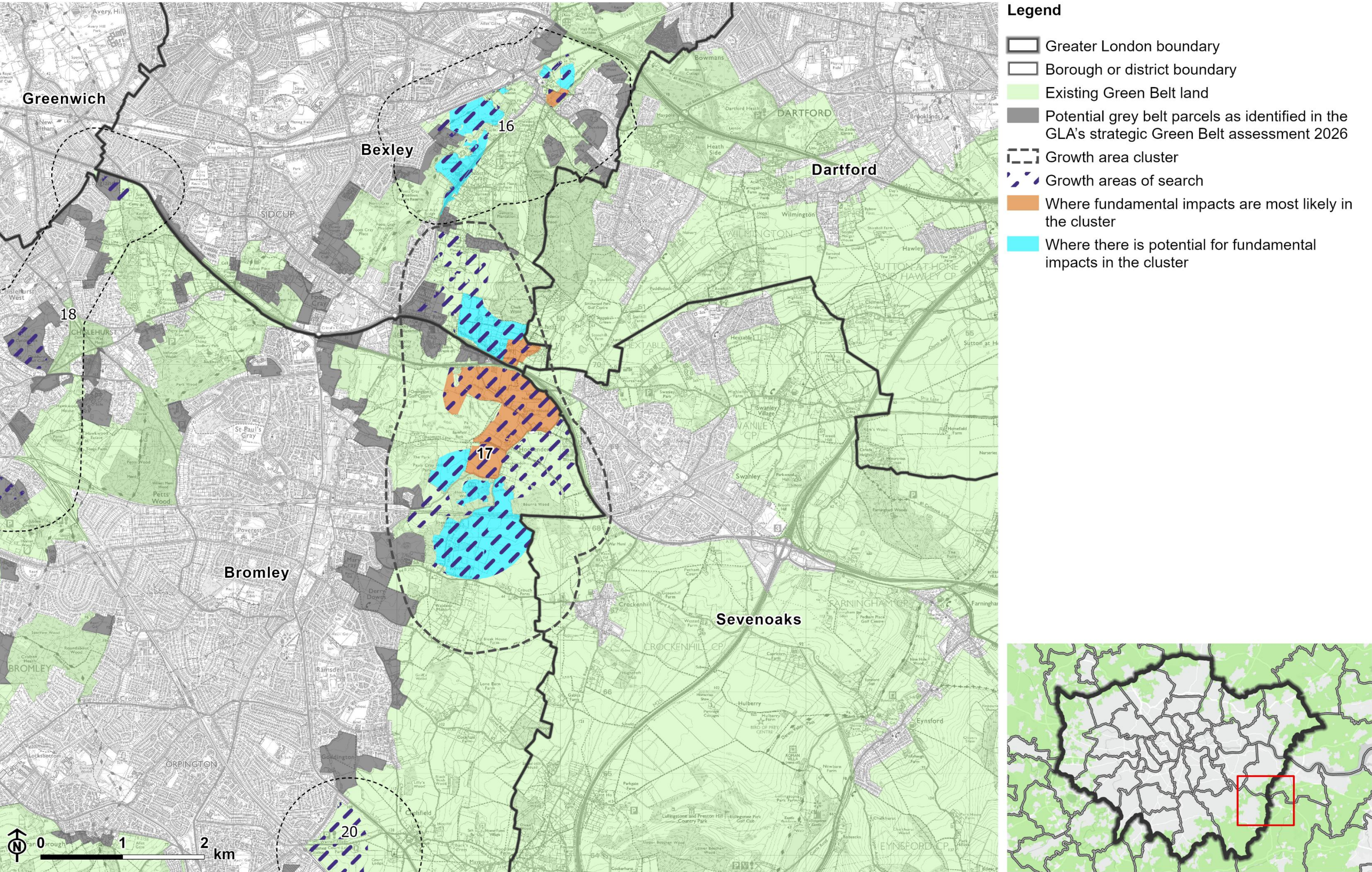
3.130 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would continue to contribute to this purpose.

3.131 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.132 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.18: Assessment of Fundamental Impacts within Land in between Foots Cray, Orpington and Swanley Growth Area of Search



Cluster 18 – North, south and central Chislehurst

3.133 This potential growth cluster is located the north, south and in the centre of Chislehurst in the London Borough of Bromley. The growth area to the north directly abuts the urban areas of London Boroughs of Bexley and Greenwich.

3.134 The area is made-up of three areas of search for potential growth:

- Land in the north of the borough adjacent to Longlands, including part of Flamingo Park sports ground.
- Chislehurst Golf Course in Chislehurst.
- Land south of Bickley and west of Petts Wood, including the open grounds north of Bromley High School.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.135 The release and development of the growth areas in this cluster, both in isolation or in combination, are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. The areas are all contained within the large built-up area of Greater London and some have some association with adjacent urban edges (relevant to Purpose A (checking the unrestricted sprawl of large built-up areas)). Other parts are already significantly isolated and contained by school buildings and buildings and infrastructure associated with outdoor sport and recreation (relevant to all purposes). Wider remanent separation between the neighbouring towns of Bromley, Orpington would continue to be maintained by the wider woodland bands to the south east of the growth areas (relevant to Purpose B (maintaining separation between neighbouring towns)). Furthermore, all the towns are already partially merged by intervening development at New Eltham and Longlands to the north (in between Bromley and Sidcup) and along Southborough Lane to the south (in between Bromley and Orpington).

3.136 Only the release of the southern two thirds of Chislehurst Golf Course in Chislehurst has the potential to isolate an area of open countryside designated as Green Belt (the northern end of the golf course) from the wider countryside to the south; however, this area is already significantly isolated by the urban area to the south and west, limiting the meaningfulness of the impact of release and

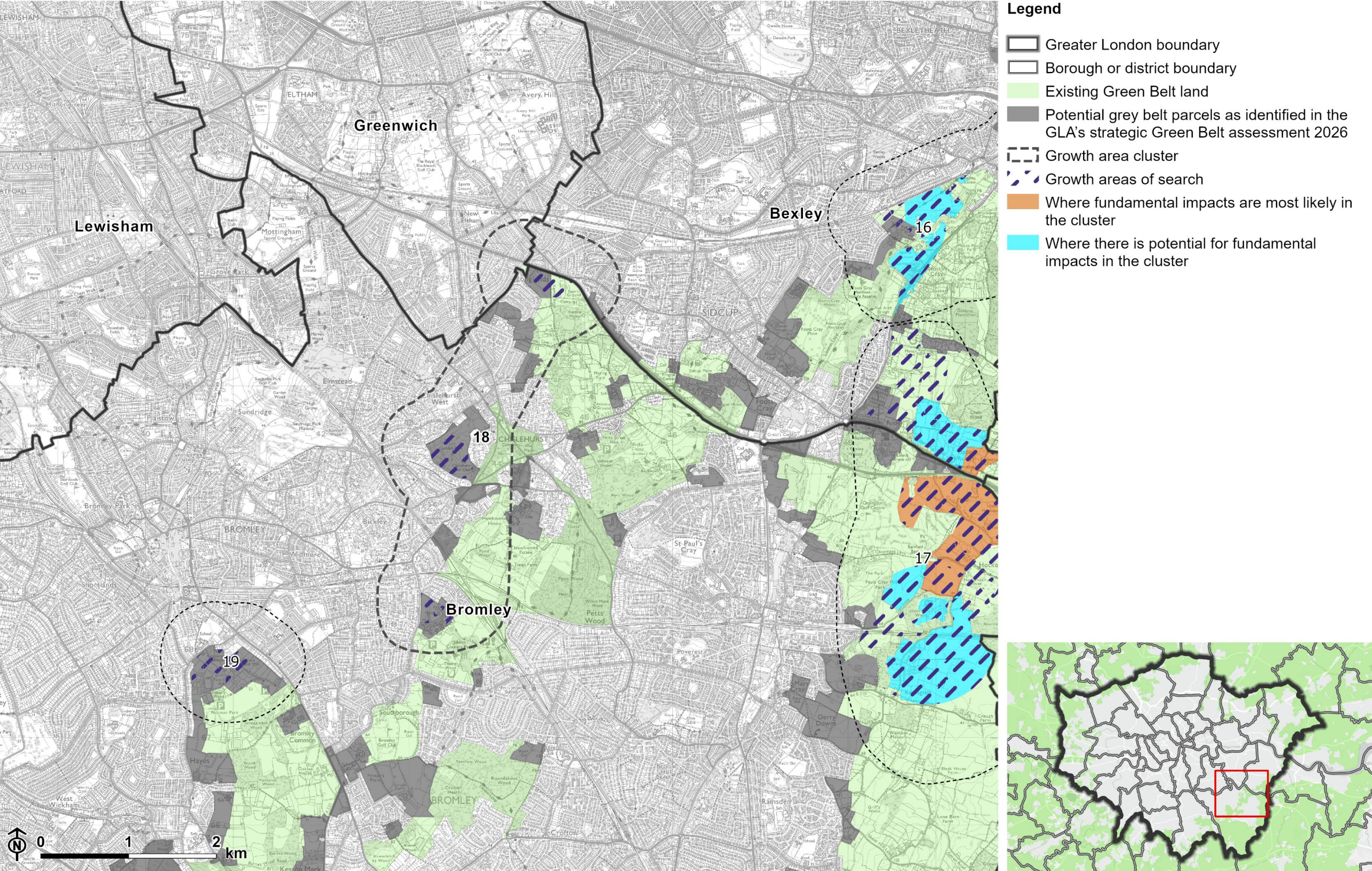
development on Purpose C (assisting in safeguarding the countryside from encroachment) in this location.

3.137 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Chislehurst is not defined as a historic town in Green Belt terms. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.138 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.19: Assessment of Fundamental Impacts within North, south and central Chislehurst Growth Area of Search



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Cluster 19 – South of Bromley

3.139 This potential growth cluster is located next to Hayes and West Wickham towards the middle of the London Borough of Bromley.

3.140 The area is made-up of a relatively small area of search for potential growth comprised of open fields south of Bromley, east and south of Bromley Trust Academy.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.141 The release and development of the growth area is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. Release and development in this location would not represent an incongruous pattern of development because the growth area is contained by the large built-up area, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas). The wider woodland blocks of Scogginhall Wood, Brook Wood, Mazzards Wood, Barnet Wood, Colyers Wood and Hayes Common would continue to maintain separation between the neighbouring towns of Orpington (via Keston Mark) and West Wickham, limiting the potential for fundamental impacts on Purpose B (preventing neighbouring towns from merging).

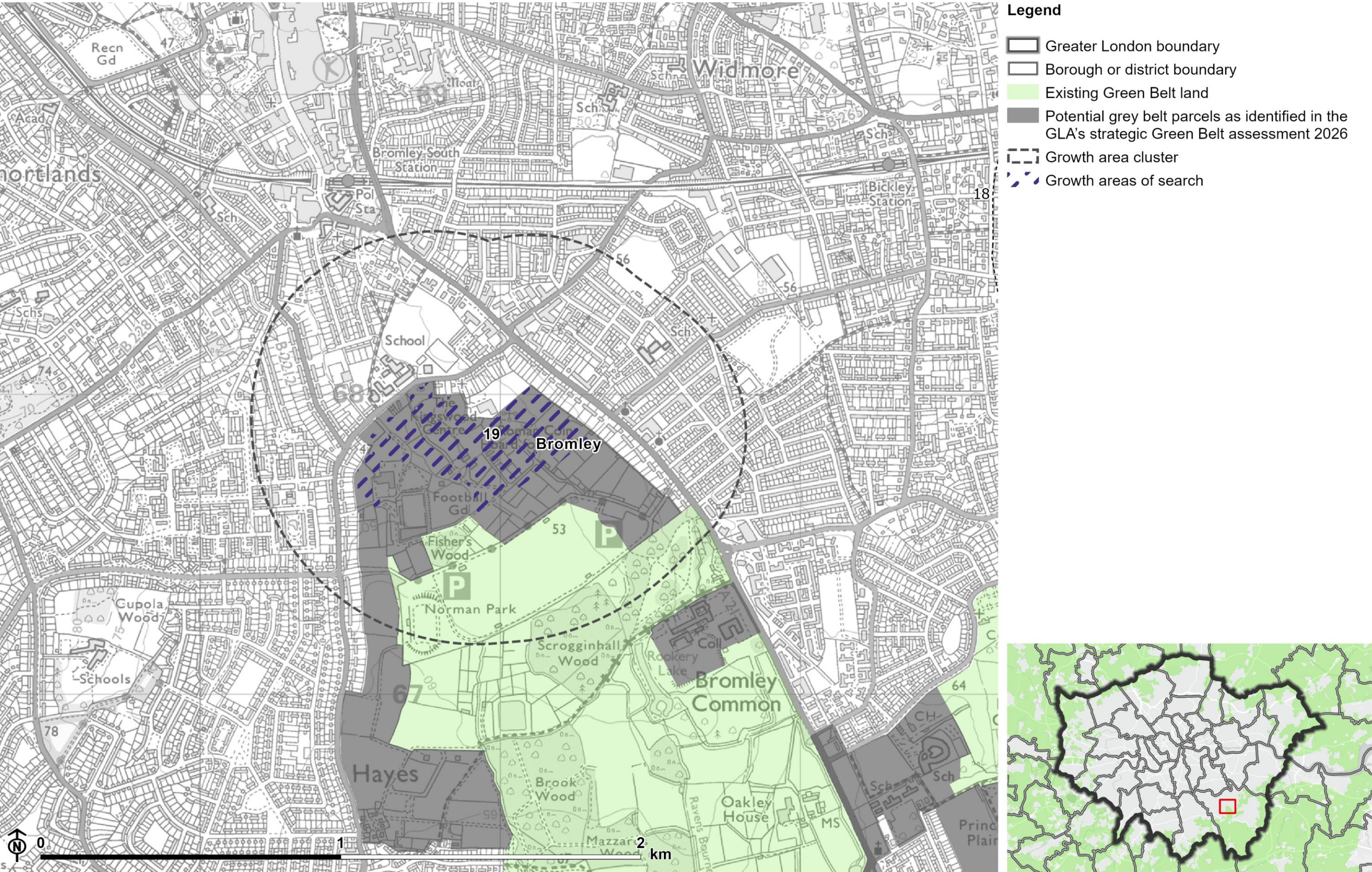
3.142 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would continue to contribute to this purpose.

3.143 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.144 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.20: Assessment of Fundamental Impacts within South of Bromley Growth Area of Search



Cluster 20 – Chelsfield and Pratts Bottom

3.145 This potential growth cluster is located to the south east of Orpington and north of Pratt's Bottom in the east of the London Borough of Bromley. The area also lies directly adjacent to the Green Belt land in the neighbouring district of Sevenoaks to the east.

3.146 The area is made-up of an area of search for potential growth east of Chelsfield Station, including Chelsfield Green, north and south of Warren Road.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.147 The release and development of the growth area is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough and neighbouring district. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. Release and development in this location would not represent an incongruous pattern of development because the growth area is partially contained by the large built-up area to the north west and south west and some open land would remain between it and the neighbouring satellite settlement of Chelsfield to the east, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas). The growth area does not lie within any notably fragile gaps between neighbouring towns, so release and development in this location is unlikely to result in fundamental impacts on Green Belt Purpose B (preventing neighbouring towns from merging).

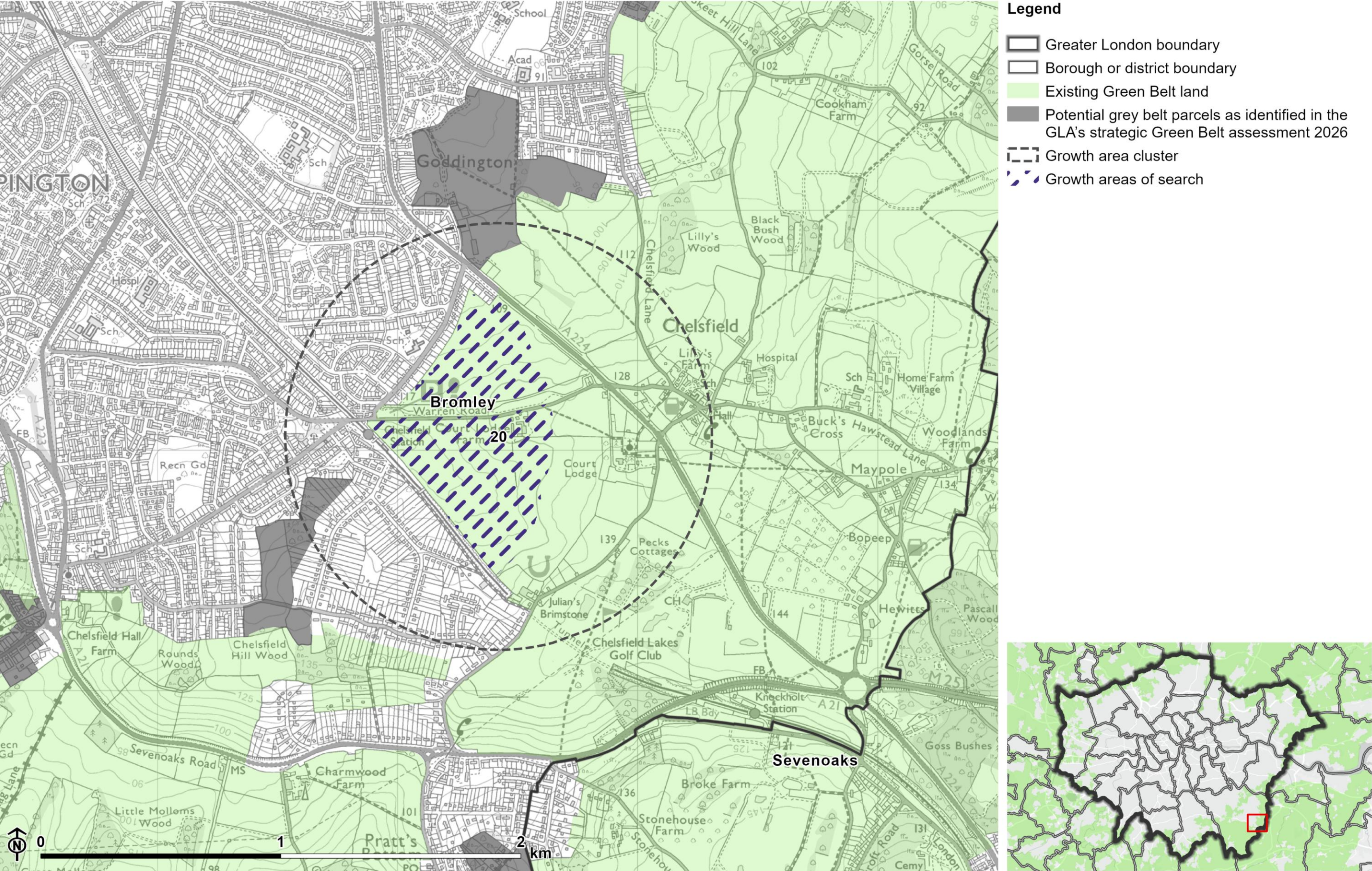
3.148 Release and development of Green Belt land in this growth area is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would continue to contribute to this purpose.

3.149 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.150 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.21: Assessment of Fundamental Impacts within Chelsfield and Pratts Bottom Growth Area of Search



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Cluster 21 – Croydon and New Addington

3.151 This potential growth cluster is located in south east Croydon, to the east of central Croydon, north of and in between Selsdon and New Addington in the London Borough of Croydon. The London Borough of Bromley and Tandridge District lie close by to the east and south, respectively.

3.152 The area is made-up of a cluster of four areas of search for potential growth:

- Covering large parts of Coombe Park, Lloyd Park and Shirley Park.
- Open land south of Gravel Hill Road.
- Development along Bishops Walk Road.
- Land in between New Addington and Selsdon, including Addington to the north.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.153 The isolated release and development of the majority of the growth area in this cluster is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or the neighbouring borough and district. This includes the isolated release and development of all areas of existing developed and urbanised land in the growth area, which generally make no more than a moderate contribution to the Green Belt purposes. The same can be said for release and development of the more open and less urbanised strongly contributing Green Belt land that could not result in the merging of New Addington and Selsdon.

3.154 The existing development within the Green Belt at Upper Shirley and along Gravel Hill Road already serves to isolate and contain the open countryside in the parks to the west and south, limiting the meaningful impact of further release and development in this area on Purpose A (checking the unrestricted sprawl of large built-up areas) and Purpose C (protecting the countryside from encroachment). Similarly, this area, along with South Croydon already physically connect the neighbouring towns of Selsdon to the south with Croydon to the north, limiting the meaningful impact of further release and development in this location on Purpose B (preventing neighbouring towns merging into one another).

3.155 The merging of Addington and New Addington would create a more incongruous finger of development near to Greater London but, as an effective northern extension to the larger inset town of New Addington to the south this would

not constitute meaningful outward sprawl of the large built-up area of Greater London.

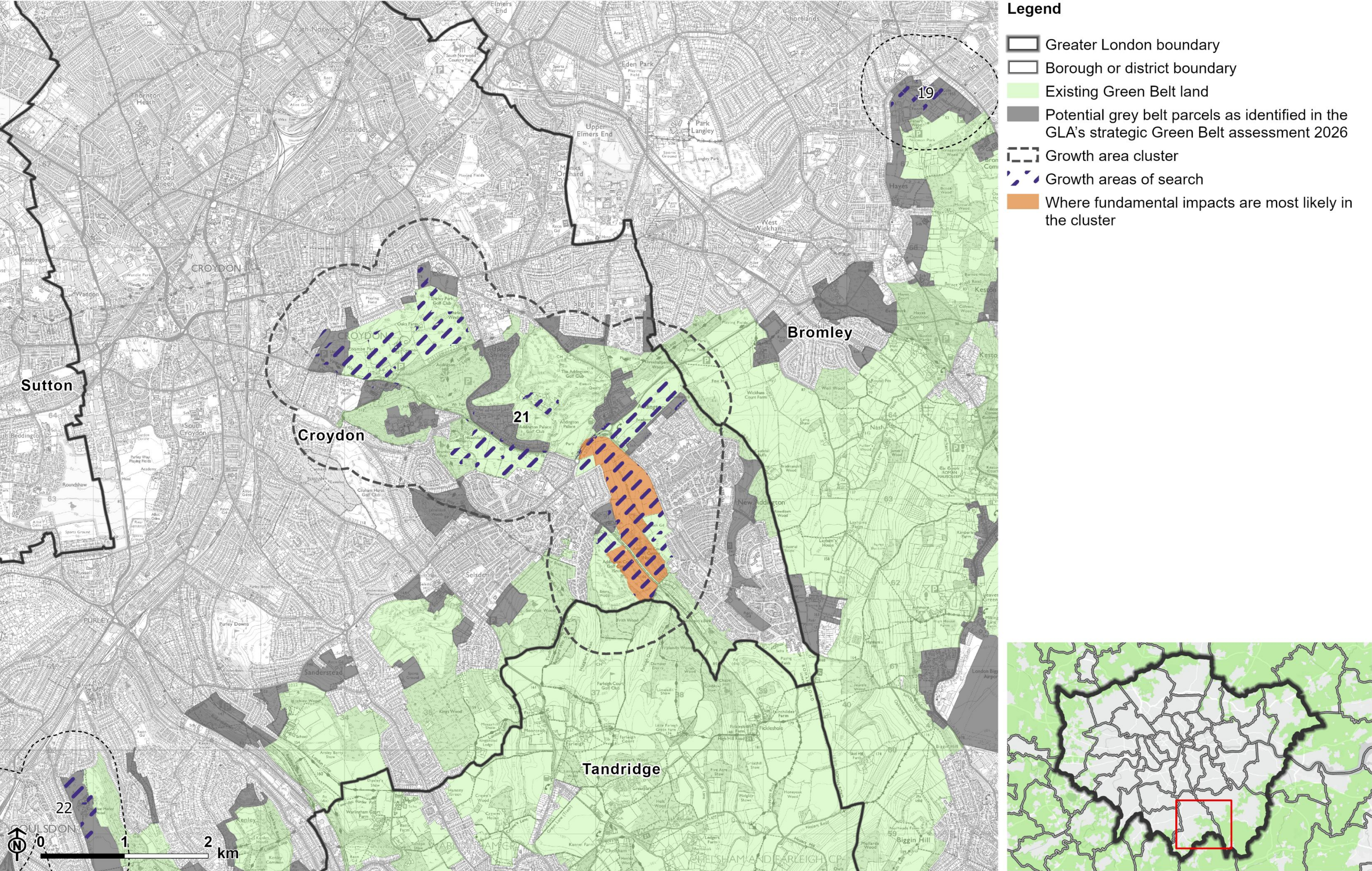
3.156 The release and development up to and including the open slopes currently maintaining separation between New Addington and Selsdon is most likely to result in fundamental impacts on Green Belt Purpose A (checking the unrestricted sprawl of large built-up areas) and Purpose B (preventing neighbouring towns merging into one another). The merging of New Addington and Selsdon would create a new significant incongruous finger of urban sprawl near to Greater London stretching from southern Croydon to the eastern edge of New Addington (relevant to Purpose A) and merge New Addington, the only neighbouring town which is currently wholly separate from neighbouring towns within the large built-up area of Greater London within the London Borough of Croydon (relevant to Purpose B).

3.157 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.158 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.22: Assessment of Fundamental Impacts within Croydon and New Addington Growth Area of Search



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Cluster 22 – Coulsdon

3.159 This potential growth cluster is located in the south of the London Borough of Croydon in close proximity to the neighbouring district of Reigate and Banstead to the south west.

3.160 The area is made-up of two areas of search for potential growth:

- The northern end of Coulsdon Manor Golf Course next to the urban edge of Coulsdon, including Coulsdon Manor.
- The open land surrounding the Cane Hill Estate, all contained within the urban area of Coulsdon.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.161 The release and development of the growth areas in this cluster, both in isolation or in combination, are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. Large portions of the areas are already urbanised to some degree by the containing urban area where they generally make no more than a moderate contribution to the Green Belt purposes.

3.162 Release and development in the stronger performing parts of the cluster would represent isolated development into parts of the Green Belt that are already significantly contained by the large built-up area, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas). Furthermore, the areas sit within remnant gaps between neighbouring towns which have already merged via intervening urban areas to the north, and wider woodland blocks, such as the woodland north of Dollyers Hill would continue to maintain the remanent separation between the neighbouring towns of Coulsden and Purley, limiting the potential for fundamental impacts on Purpose B (preventing neighbouring towns from merging).

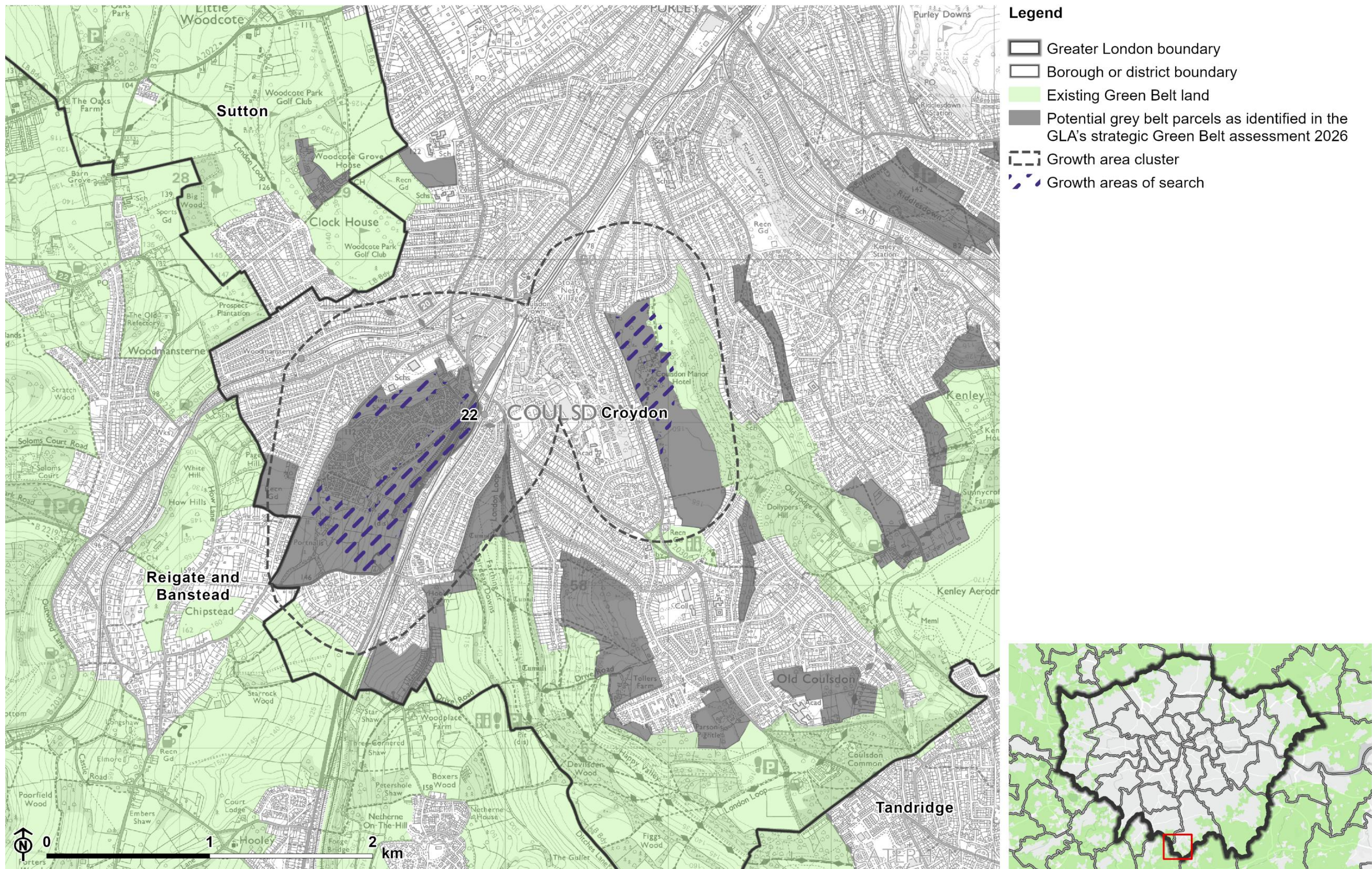
3.163 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment) given the wider integrity and connections of the existing green wedges into the urban area would be retained. Similarly, no Green Belt land within this growth area cluster

makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.164 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.23: Assessment of Fundamental Impacts within Coulsdon Growth Area of Search



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Cluster 23 – Chessington and Hook

3.165 This potential growth cluster is located in the south of the London Borough of Kingston-upon-Thames and borders the neighbouring districts of Elmbridge to the west and Epsom and Ewell to the east.

3.166 The area is made-up of three areas of search for potential growth:

- An area of open fields in between the urban edge of Hook to the east and development next to the Esher and Kingston Bypass to the west and north.
- An area of open fields and woodland blocks in between the urban edge of Chessington to the east and north east, Claygate to the west and Chessington World of Adventures to the south.
- An area of open fields to the south east of Chessington and immediately west of Horton Country Park.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.167 The isolated release and development of the northern portion of the growth area cluster directly north and south of Clayton Road is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough and neighbouring plan areas. This area is already significantly retained and contained by the A3 to the west as well as by Lovelace Primary School to the south and several urbanising influences off Clayton Road to the north and west.

3.168 The isolated release and development of the eastern portion of the growth area cluster south west of Chessington and either side of the Bonesgate Stream is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough and neighbouring plan areas. This area is already partially contained by the urban area of Chessington to the north and ribbon development along Green Lane to the west. Furthermore, the woodland bands of the Horton Country Park to the east inhibit further eastward sprawl towards the development at Hobbledown and Epsom and Ewell beyond.

3.169 However, the release and development of the open countryside south of Lovelace Primary School and north and west of Winey Hill sits in fragile gap between the large built up area of Greater London (including the town of Tolworth) and the neighbouring town of Esher (merged with Claygate and Hinchley Wood). The release

and development of these parts of the growth area cluster are most likely to fundamentally undermine the role of the borough's Green Belt land to Purposes A (checking the unrestricted sprawl of large built-up areas) and B (preventing neighbouring towns from merging).

3.170 With regards to Purpose A (checking the unrestricted sprawl of large built-up areas), this area plays a particularly meaningful role in preventing the sprawl of the large built-up area into the currently distinct urban area of Claygate (merged with Esher). As the only large satellite settlement in close proximity to the large built-up area of Greater London in the borough, the loss of the remaining open land between Greater London and Claygate (merged with Esher) would be particularly significant in Green Belt terms, extending the large built-up area of Greater London's sprawling influence beyond the A3 to the west towards Walton-on-Thames and Weybridge. The significance of the A3 as a retaining and separating feature in this part of the borough is relatively insignificant given that the urban area of Claygate lies immediately beyond it to the west.

3.171 With regards to Purpose B (preventing neighbouring towns from merging), this area plays a particularly meaningful role in preventing the merging of the neighbouring towns of Tolworth (via Chessington and Hook) and Claygate (merged with Esher). As the narrowest and most fragile gap between towns in the borough, the loss of the remaining open land between them would be particularly significant in Green Belt terms, not only merging the towns but weakening separation between Greater London's towns and Walton-on-Thames (via Claygate and Esher) beyond to the west. Again, the significance of the A3 as a separating feature in this part of the borough is relatively insignificant given that the urban area of Esher/Claygate lies immediately beyond it to the west. It is acknowledged that the wider Green Belt within the borough and the neighbouring District of Elbridge to the west would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole on Purpose B.

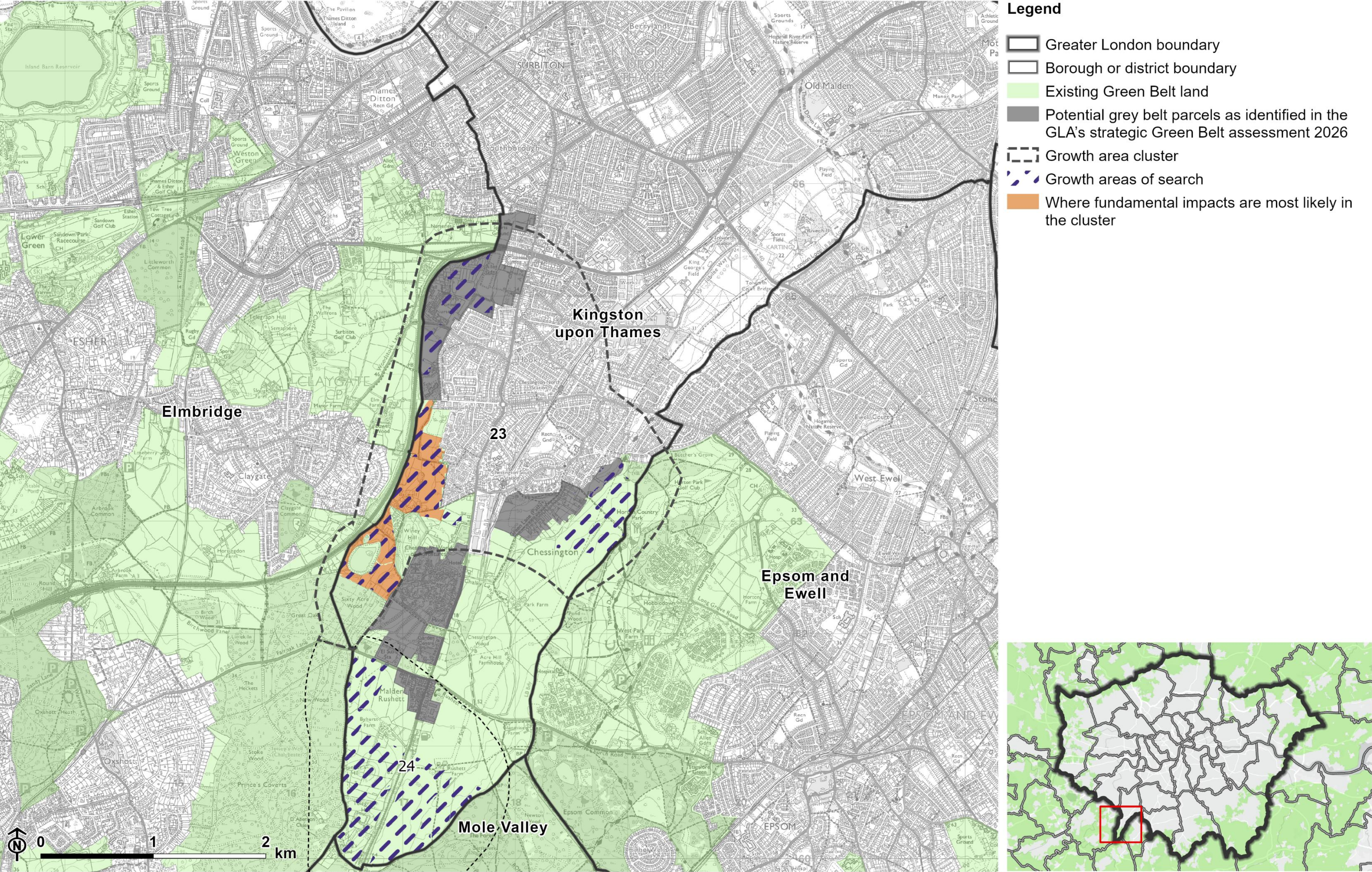
3.172 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would continue to contribute to this purpose. The Green Belt land immediately to the west, north of Claygate would become more isolated from the wider Green Belt to the south; however, this area of open countryside is already notably contained and somewhat isolated from the wider countryside, limiting how meaningful further isolation and truncation would be in this part of the neighbouring plan area.

3.173 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.174 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.24: Assessment of Fundamental Impacts within Chessington and Hook Growth Area of Search



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Cluster 24 – Malden Rushett

3.175 This potential growth cluster is located in the south of the London Borough of Kingston-upon-Thames and borders the neighbouring districts of Elmbridge to the west, Mole Valley to the south and Epsom and Ewell to the east.

3.176 The area is made-up of an area of potential development south and west of the village of Malden Rushett, including the surrounding open agricultural fields and woodland blocks framed by mature woodlands to the west, south and south east.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.177 The isolated release and development of this growth area in the southern tip of the borough is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough and neighbouring plan areas.

Development of the area in its entirety would represent notable southward sprawl (relevant to Purpose A (checking the unrestricted sprawl of large built-up areas)) directly south of the village of Malden Rushett and Chessington World of Adventure, both of which are in close proximity to the large built-up area of Greater London. The area would also result in a significant narrowing of the gap between the neighbouring towns of Leatherhead (merged with Ashted, Bookham and Fetcham) and Tolworth (via Hook and Chessington) along the connecting Kingston Road (relevant to Purpose B (prevent neighbouring towns merging into one another)). However, in relation to both purposes, both sprawl and merging would still be inhibited by the dense woodlands to the east, west and south of the growth area. Furthermore, the remaining open countryside to the north of the growth area would become more important in inhibiting the further southern extension of Greater London, including merging with the potential new growth area.

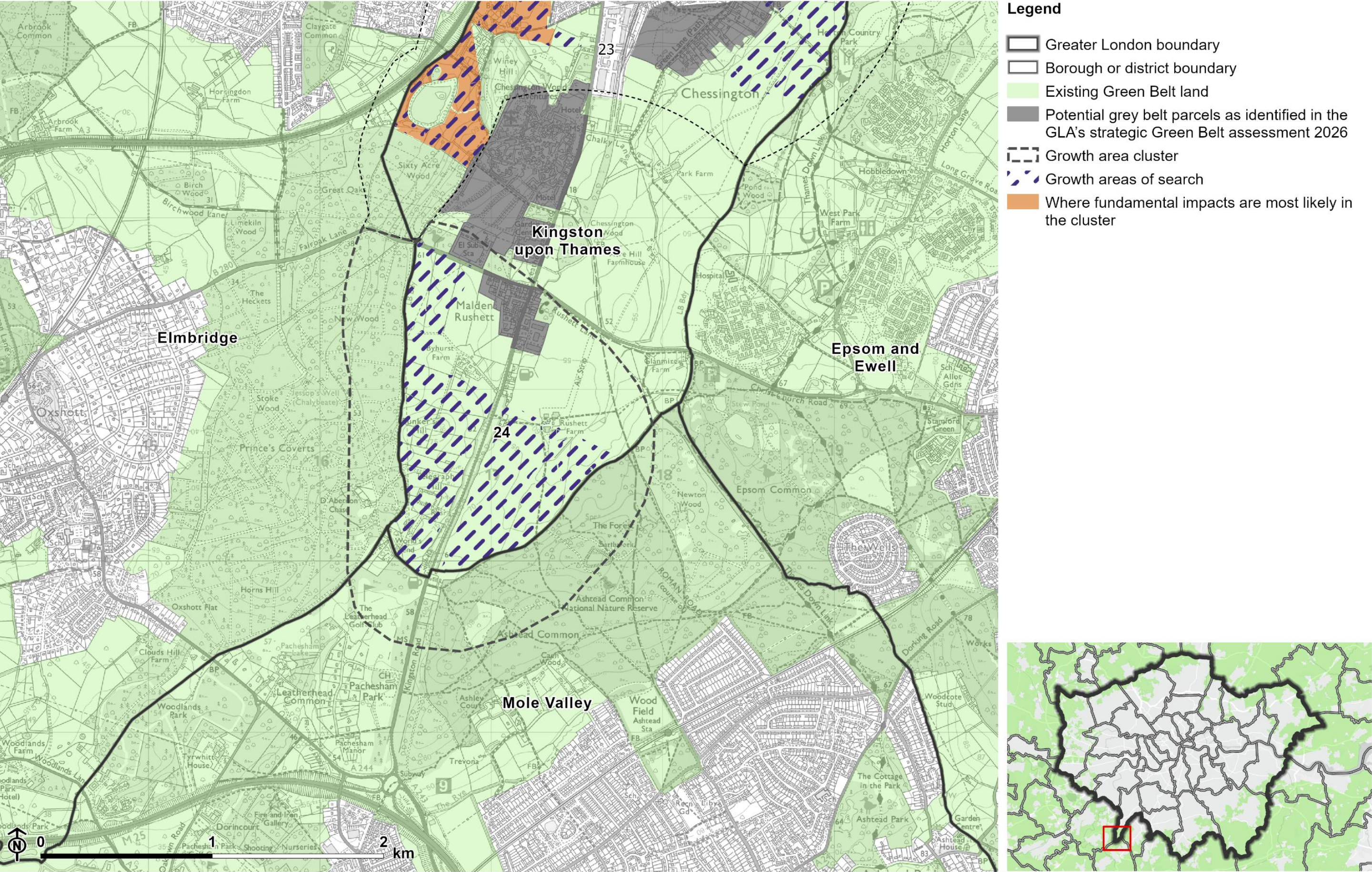
3.178 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would continue to contribute to this purpose.

3.179 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.180 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.25: Assessment of Fundamental Impacts within Malden Rushett Growth Area of Search



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Cluster 25 – North Feltham

3.181 This potential growth cluster is located in the east of the London Borough of Hounslow and lies in close proximity to the neighbouring London Borough of Hillingdon to the north west.

3.182 The area is made-up of two areas of search for potential growth:

- Hatton Road Allotments and neighbouring sports and playing fields.
- Parts of Hatton Cemetery, The Marjory Kinnon School, Hounslow Urban Farm and intervening scrubland.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.183 The release and development of this growth area is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. The area is contained within the large built-up area of Greater London and has some association with adjacent urban edges (relevant to Purpose A (checking the unrestricted sprawl of large built-up areas)). The area lies in an area between the already merged Feltham and Heathrow Airport. Although the airport is not a town in its own right, it acts as an urban bridge narrowing the gap between wider towns. However, the wider open land surround the growth area would continue to maintain what limited separation remains, limiting the meaningfulness of impacts on Purpose B (prevent neighbouring towns merging into one another).

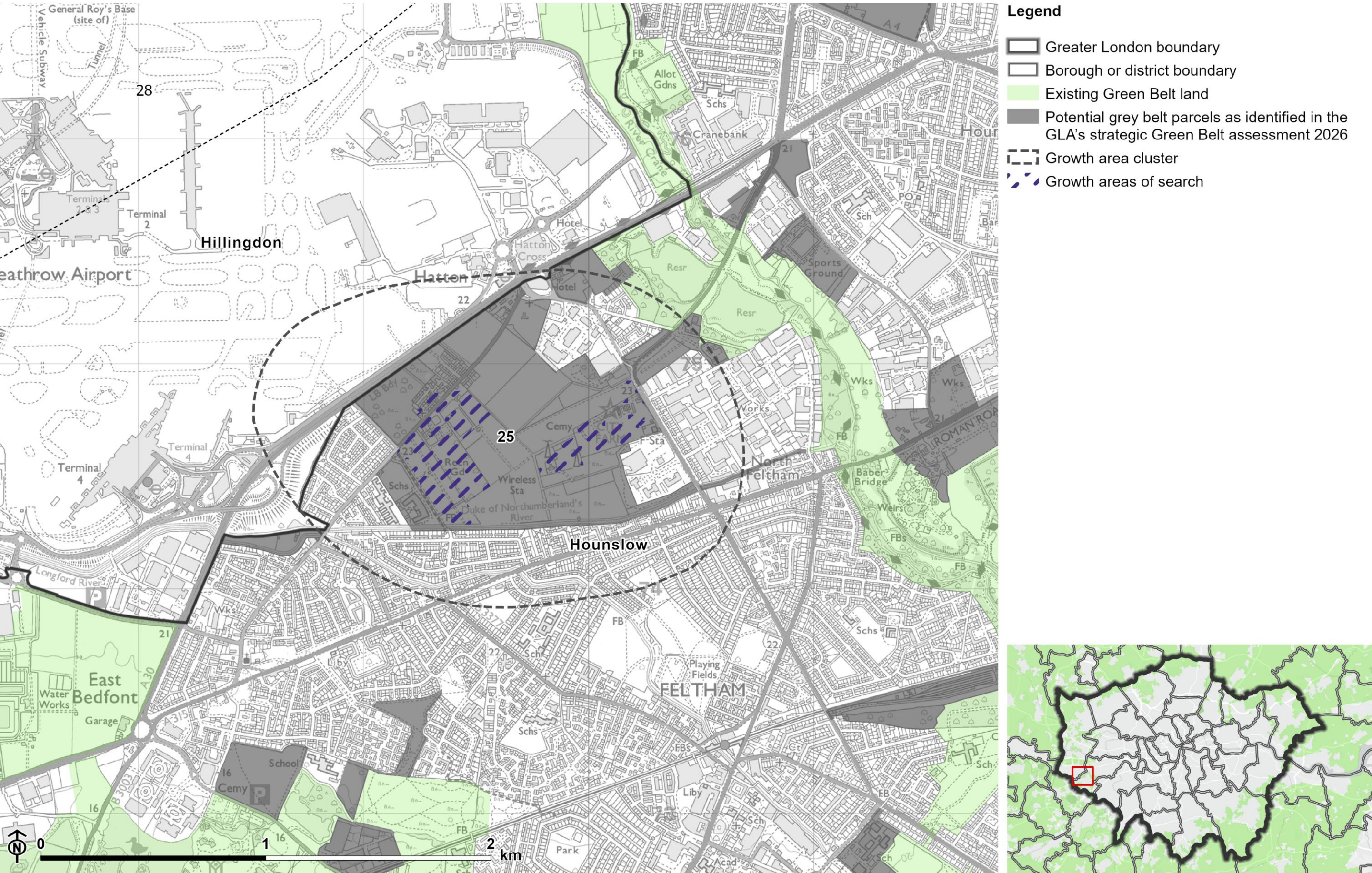
3.184 The wider Green Belt land surrounding the growth area is already significantly isolated by the urban area of Greater London from the wider countryside, limiting the meaningfulness of the impact of release and development on Purpose C (assisting in safeguarding the countryside from encroachment) in this location.

3.185 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.186 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.26: Assessment of Fundamental Impacts within North Feltham Growth Area of Search



Cluster 26 – Heston and North Hyde

3.187 This potential growth cluster is located in the London borough of Hounslow and in close to wider Green Belt land in the neighbouring London Borough of Hillingdon to the west. The urban area of Southall lies in close proximity to the north east.

3.188 The area is made-up of two areas of search for potential growth:

- An area of potential for development in between the urban areas of Heston to the south and North Hyde to the north, comprised of sports fields south of the M4, the London Airlinks Golf Course and scrubland to the north of the M4.
- An area for potential development east of the Parkway (A312), including woodland surrounding and scrubland to the south of a large food distribution warehouse.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.189 The release and development of the growth areas in this cluster, both in isolation or in combination, are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. Large portions of the areas are already urbanised by the containing urban area to a degree such that they generally making no more than a moderate contribution to the Green Belt purposes.

3.190 Release and development in the cluster would not represent an incongruous pattern of development because of its existing containment by the large built-up area, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas).

3.191 The growth area cluster generally lies within a gap between the neighbouring towns of Hounslow and Southall, but the towns are already merged to the east limiting the significance of this area in maintaining separation. Therefore, release and development in this location is unlikely to result in fundamental impacts on Green Belt Purpose B (preventing neighbouring towns from merging).

3.192 The Green Belt land in the growth area is already significantly truncated and isolated from the wider countryside, such that further release and development is not

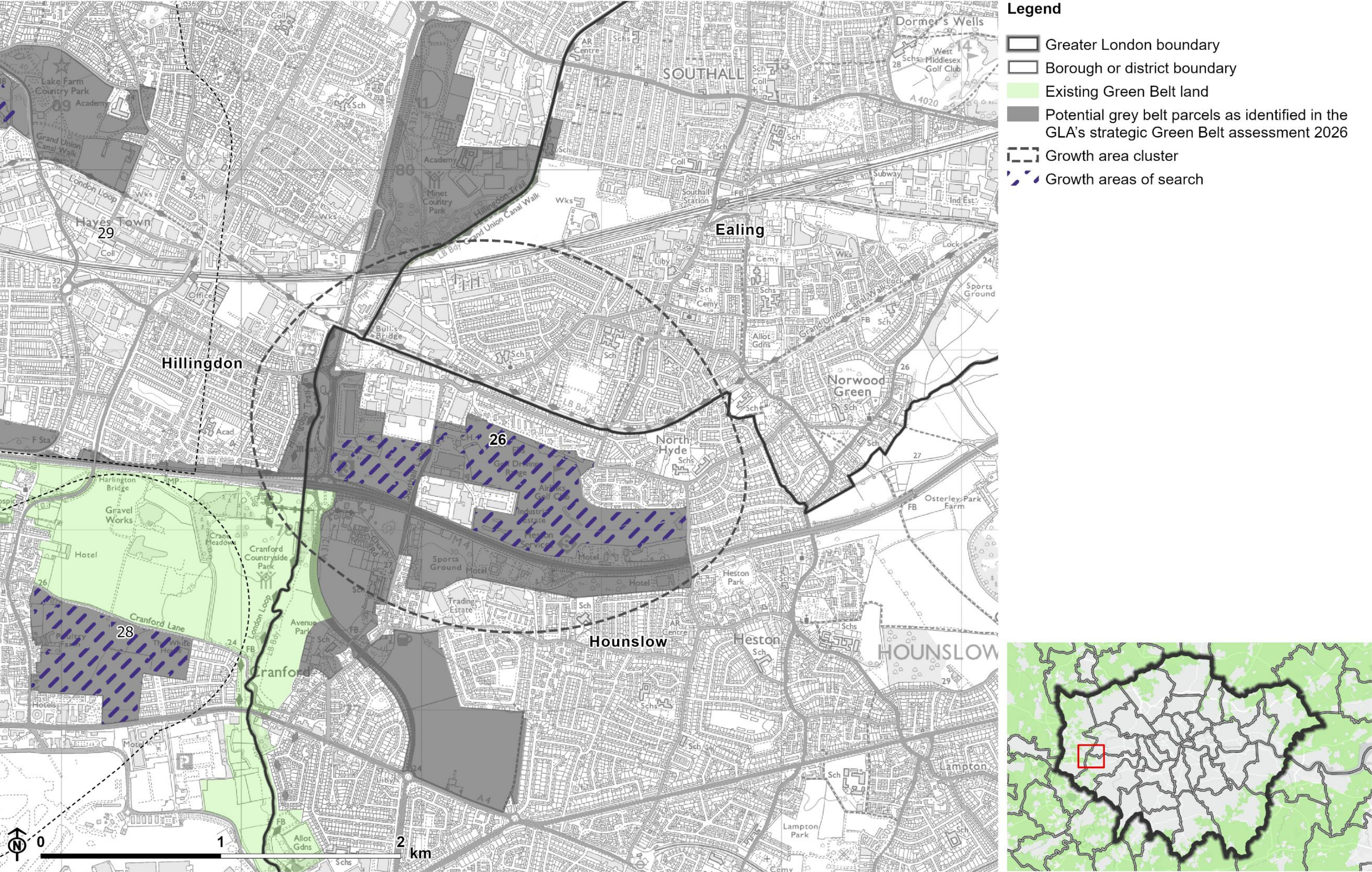
considered to be at risk of fundamentally undermining the remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment).

3.193 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.194 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.27: Assessment of Fundamental Impacts within Heston and North Hyde Growth Area of Search



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Cluster 27 – Land in between Northolt, Hillingdon and Yeading

3.195 This potential growth cluster is located in the west of the London Borough of Ealing and in the east of the London Borough of Hillingdon.

3.196 The area is made-up of three areas of search for potential growth:

- Larkspur Rovers playing fields and the open fields to the west.
- The West London Family Golf Course and The Inspiration/C&L Country Club Golf Course and neighbouring sports pitches and scrubland.
- An area of open fields next to Bourne Primary School in the west and north of Islip Manor Nature Reserve in the south east. X

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.197 The isolated release and development of the growth areas in this cluster, both in isolation and in combination are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the boroughs. Some parts of the areas are already developed and urbanised, but the vast majority of the areas are open but contained and or urbanised by neighbouring areas, such that the majority of the land makes no more than a moderate contribution to the Green Belt purposes.

3.198 Release and development in the cluster would not represent an incongruous pattern of development because of its existing containment by the large built-up area, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas).

3.199 The remanent separation between the neighbouring towns of Northolt, Greenford and Ruislip would largely be lost, although these neighbouring towns are already largely merged to the north and east, limiting how meaningful the impact on Purpose B (preventing neighbouring towns from merging) would be.

3.200 The wider Green Belt land surrounding the growth areas is already significantly isolated from the wider countryside by the urban area of Greater London, as well as development along Ruislip Road (A4180), limiting the meaningfulness of the impact of release and development on Purpose C (assisting in safeguarding the countryside from encroachment) in this location.

3.201 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.202 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

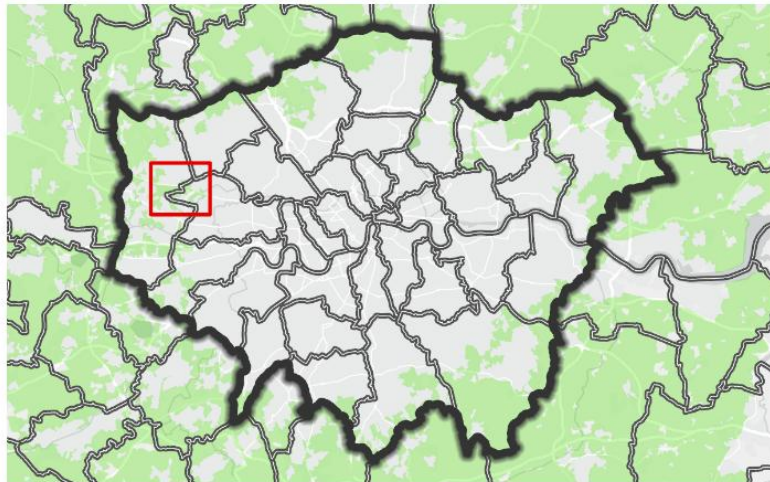
The map displays the Hillingdon Aerodrome and its surroundings. Key features include:

- Green Spaces:** Hillingdon Trail, Gutteridge Wood, Ten Acres, West London Shooting Grounds, Hayes Park, and Hayes End.
- Water Features:** Hillingdon Brook and Yeadon Brook.
- Residential Areas:** Ruislip Gardens, Hill Farm, Hillingdon, North Hillingdon, and Ealing.
- Infrastructure:** A40 road, Hillingdon Aerodrome, and various schools and public facilities.
- Other Landmarks:** Ruislip Manor, South Ruislip, and Northolt.

A scale bar at the bottom indicates distances up to 2 km.

Legend

- Greater London boundary
- Borough or district boundary
- Existing Green Belt land
- Potential grey belt parcels as identified in the GLA's strategic Green Belt assessment 2026
- Growth area cluster
- Growth areas of search



The map displays the Greater London boundary as a thick black line. Within this boundary, numerous borough or district boundaries are shown as thin grey lines. Green Belt land is represented by light green areas, while potential grey belt parcels are shown in light grey. A red rectangle highlights a specific area in the western part of London, within the borough of Ealing, which is a focus for the study.

Cluster 28 – Harlington and Heathrow

3.203 This potential growth cluster is located in the south of the London Borough of Hillingdon and borders Green Belt land in the neighbouring London Borough of Hounslow to the east, the neighbouring boroughs of Slough and Windsor and Maidenhead to the west and neighbouring district of Spelthorne to the south west.

3.204 The area is made-up of two areas of search for potential growth:

- An area of scrubland and woodland containing a small gardening college and pets facility immediately west of Heathrow Airport Terminal 5.
- Open fields east of Harlington and north of Heathrow airport south of Cranford Lane.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.205 The isolated release and development of the growth areas in this cluster are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough and neighbouring plan areas. This includes the isolated release and development of all areas of existing developed and urbanised land in the growth areas, which generally make no more than a moderate contribution to the Green Belt purposes.

3.206 Release and development in the land east of Harlington and north of Heathrow Airport would not represent an incongruous pattern of development because of its existing containment by the large built-up area, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas).

3.207 The remanent separation between the neighbouring towns of West Drayton, Hayes and Hounslow and Feltham (via Heathrow Airport) north of Heathrow Airport would be maintained. These neighbouring towns are already largely merged via the villages Harmondsworth, Harlington and Sipson that punctuate this growth area, further limiting how meaningful the impact on Purpose B (preventing neighbouring towns from merging) would be.

3.208 The wider Green Belt land surrounding the growth areas is already significantly isolated from the wider countryside by the urban area of Greater London to the north and south and the villages of Harmondsworth, Harlington and Sipson that punctuate the area north of the airport, limiting the meaningfulness of the impact of release and

development on Purpose C (assisting in safeguarding the countryside from encroachment) in this location.

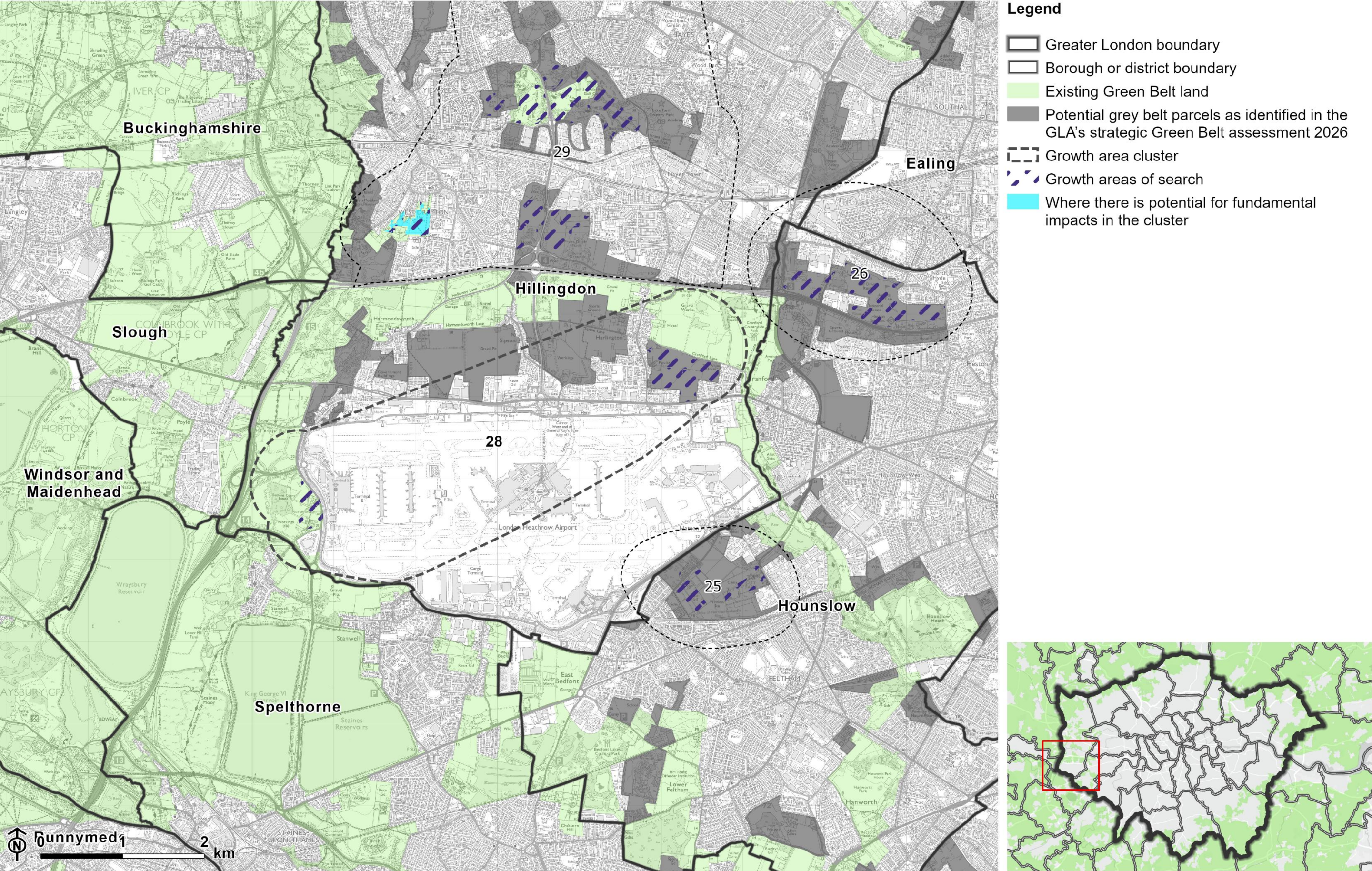
3.209 The land to the west of Stanwell Moor Road (A3044) west of Heathrow Airport is not contained but is already partially developed and there is already some ribbon development beyond the road to the south and west along Spout Lane North Road, reducing the meaningfulness of the impact of the fairly limited extent of westward development in this location on Purposes A (checking the unrestricted sprawl of large built-up areas), B (preventing neighbouring towns from merging) and C (assisting in safeguarding the countryside from encroachment).

3.210 No Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.211 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.29: Assessment of Fundamental Impacts within Harlington and Heathrow Growth Area of Search



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Cluster 29 – Central Hillingdon

3.212 This potential growth cluster is made-up of several potential locations in the centre of the London Borough of Hillingdon, either entirely within or heavily contained by the large built-up area of Greater London and its constituent towns.

3.213 The area is made-up of eleven isolated areas of search for potential growth:

- Land in between Ickenham and Ruislip north and south of the highspeed railway line west of West Ruislip Station and east of Breakspear Road South.
- The Sacred Heart Catholic Primary School playing fields and Ruislip Rugby Football Club playing fields.
- Scrubland south of Ruislip Railway Depot.
- Hillingdon House Farm Sports Grounds and neighbouring woodlands and meadows.
- Land south of Ickenham Station, north of Western Avenue (A40) and west of Northolt Aerodrome.
- Land in the south east and immediately beyond Dowding Park.
- Pole Hill Open Space and adjacent open land.
- Former Heinz Beans complex and neighbouring open land north of Hayes End.
- Hale Field Park, Stokely Park Golf Course, Chestnut Avenue Open Space and Uxbridge Football Club Playing field.
- The Closes Open Space and St Georges Meadows south of West Drayton.
- Land in between West Drayton and Hayes Town, including Bourne Farm Recreation Ground and neighbouring open land north of the M4.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.214 The isolated release and development of the majority of the growth areas in this cluster are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the London Borough of Hillingdon. This includes the isolated release and development of all areas of existing developed and urbanised land in the growth areas, which generally make no more than a moderate contribution to the Green Belt purposes. The same can be said for release and

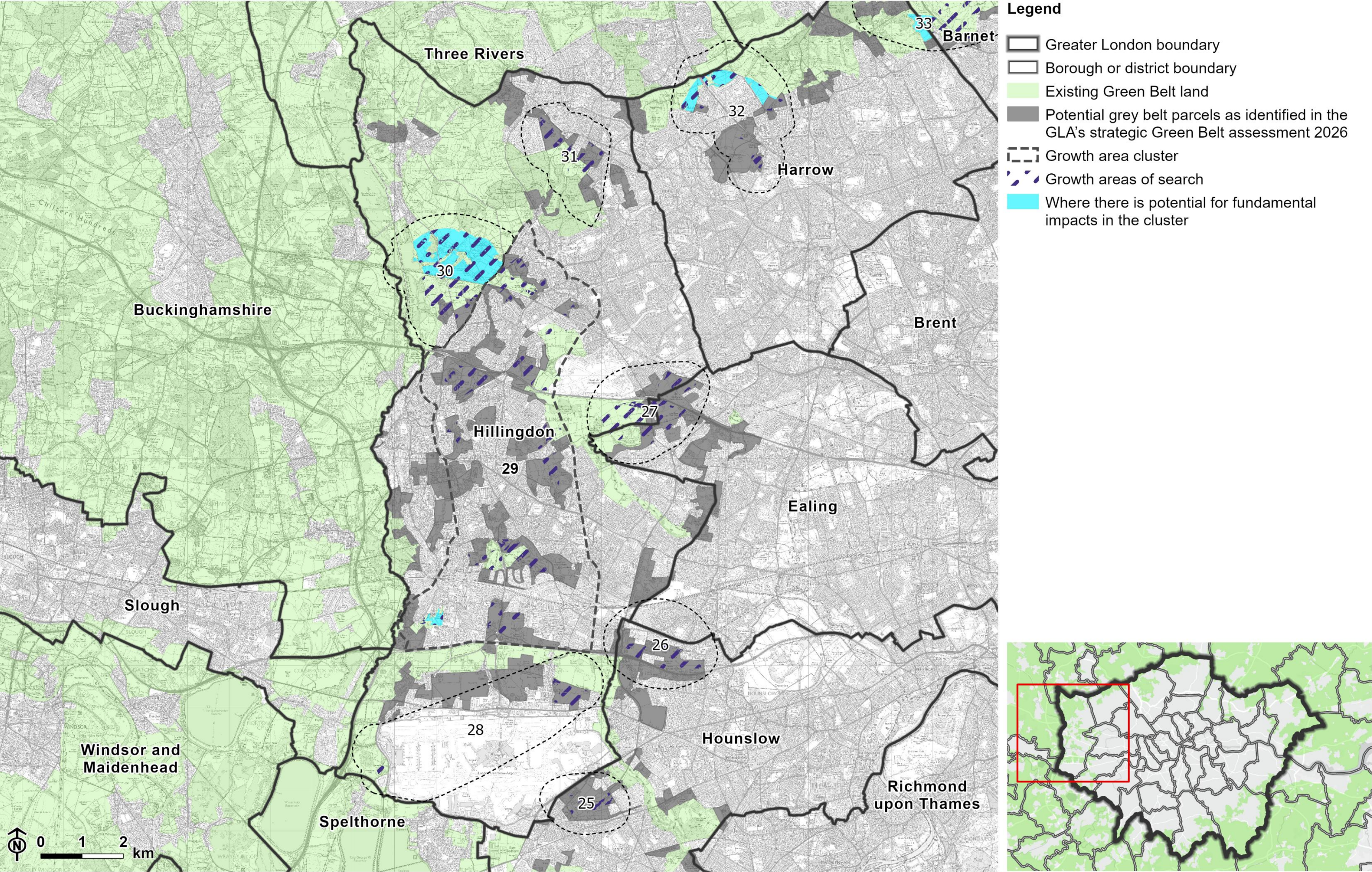
development of the more open and less urbanised strongly contributing Green Belt land, noting that all the locations are already either wholly isolated within the large built-up area or significantly contained by it, limiting their relationship with the wider countryside and therefore impacts on Purpose A (checking the unrestricted sprawl of large built-up areas) and Purpose C (protecting the countryside from encroachment). Furthermore, these locations lie within remanent gaps between neighbouring towns that have already been merged either directly or indirectly via intervening urban areas, limiting impacts on Purpose B (prevent neighbouring towns merging into one another).

3.215 The potential notable exception is release and development in The Closes Open Space and St Georges Meadows, which has the potential to have a fundamental impact on Purpose D (preserving the setting and special character of historic towns). These green open spaces directly abut the historic core of the historic town of West Drayton and therefore make a considerable contribution to its setting and special character. Any loss of openness in this location could have a meaningful impact on the ability of the remainder of the London Borough of Hillingdon's Green Belt land, to preserve the setting and special character of the historic town of West Drayton. It is, however, also acknowledged that some release and development could be in keeping with or even enhance the visual, physical or experiential relationship between remaining open Green Belt land and a historic town.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.216 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.30: Assessment of Fundamental Impacts within Central Hillingdon Growth Area of Search



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Cluster 30 – Land north west of Ickenham and Newyears Green

3.217 This large potential growth cluster is located in the north west of the London Borough of Hillingdon and lies in close proximity to Green Belt in neighbouring Buckinghamshire to the west.

3.218 The area is made-up of an area stretching from the urban edges of Ickenham and Ruislip in the south and east north westwards close to the southern edge of South Harefield. The area covers an area of open agricultural fields punctuated by woodland blocks, Newyears Green, Copthall Farm and Harvill Farm, Harefield Dog Trust and Hillingdon Junior Canoe Club.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.219 The isolated release and development of the open land south of the railway line in this growth area is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough and neighbouring plan areas. Release and development in this area would not result in the potential perceived merging of the large built-up area of Greater London with South Harefield/Harefield.

3.220 The release and development of a continuous stretch of open countryside in between the large built-up area of Greater London and South Harefield/Harefield would create a significant incongruous figure of sprawl out into the largest area of open countryside in the London Borough of Hillingdon and significantly increased the perceived relationship between the two distinct urban areas, increasing their combined sprawling influence. Release and development of the entirety of the area would still maintain some physical separation between Greater London and South Harefield south of Harvil Road, but the significance of this relative to the scale of the urban extension and the remaining gap would be limited. Consequently, the release and development of the entirety of the growth area north of the railway line has some potential to result in fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas). Smaller, more isolated release and development north of the railway line could be delivered without fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas).

3.221 Release and development of the areas of growth immediately north west of Breakspear Road has the potential to have fundamental impacts on Purpose C (assisting in safeguarding the countryside from encroachment). Development of all of the land immediately to the north west of the road has the potential to isolate the areas of open countryside to the south east of the road from the wider countryside to the north west. However, the likelihood of this is somewhat limited, not least because, in isolation, this area represents a relatively small proportion of the borough's open countryside designated as Green Belt with the vast majority continuing to remain open and connected to the wider open countryside. The same area represents the only part of the growth area cluster where release and development is at risk of merging neighbouring towns, specifically the neighbouring towns of Ruislip with Uxbridge (via Ickenham), with the potential for fundamental impacts against Purpose B (preventing neighbouring towns from merging). However, this is highly unlikely given that the towns are already indirectly merged to the east via the intervening urban areas of West Ruislip and North Hillingdon. Furthermore, it is acknowledged that the wider Green Belt within the borough and neighbouring plan areas and would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

3.222 Although an increased association between Greater London and South Harefield/Harefield would significantly narrow the gap between Greater London's towns and the neighbouring towns of Gerrards Cross (via Denham) to the west and Rickmansworth to the north, large open areas would continue to maintain separation, including the large open bodies of water of the Colne Valley, limiting the potential for fundamental impacts on Purpose B (preventing neighbouring towns from merging) in the wider gaps in the growth area cluster.

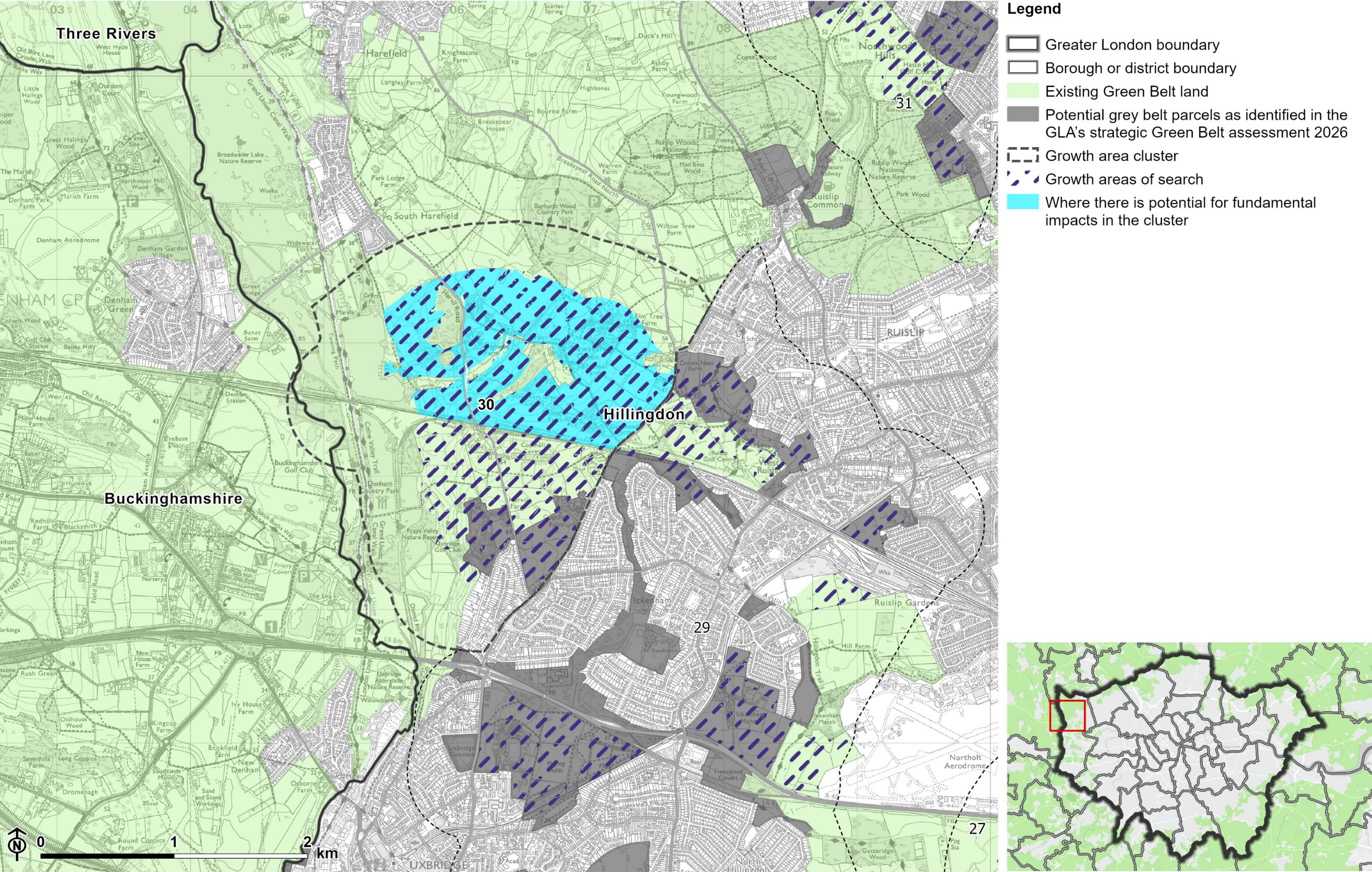
3.223 No Green Belt land within this growth area cluster makes a contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on Purpose D (preserving the setting and special character of historic towns).

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.224 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken

together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.31: Assessment of Fundamental Impacts within Land north west of Ickenham and Newyears Green Growth Area of Search



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Cluster 31 – Eastcote and Northwood

3.225 This potential growth cluster is located in the north of the London Borough of Hillingdon.

3.226 The area is made-up of an area of search for potential growth stretching across Haste Hill Golf Course and Northwood Golf Course and adjacent open and developed land, including Northwood Cemetery and Northwood Recreation Ground.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

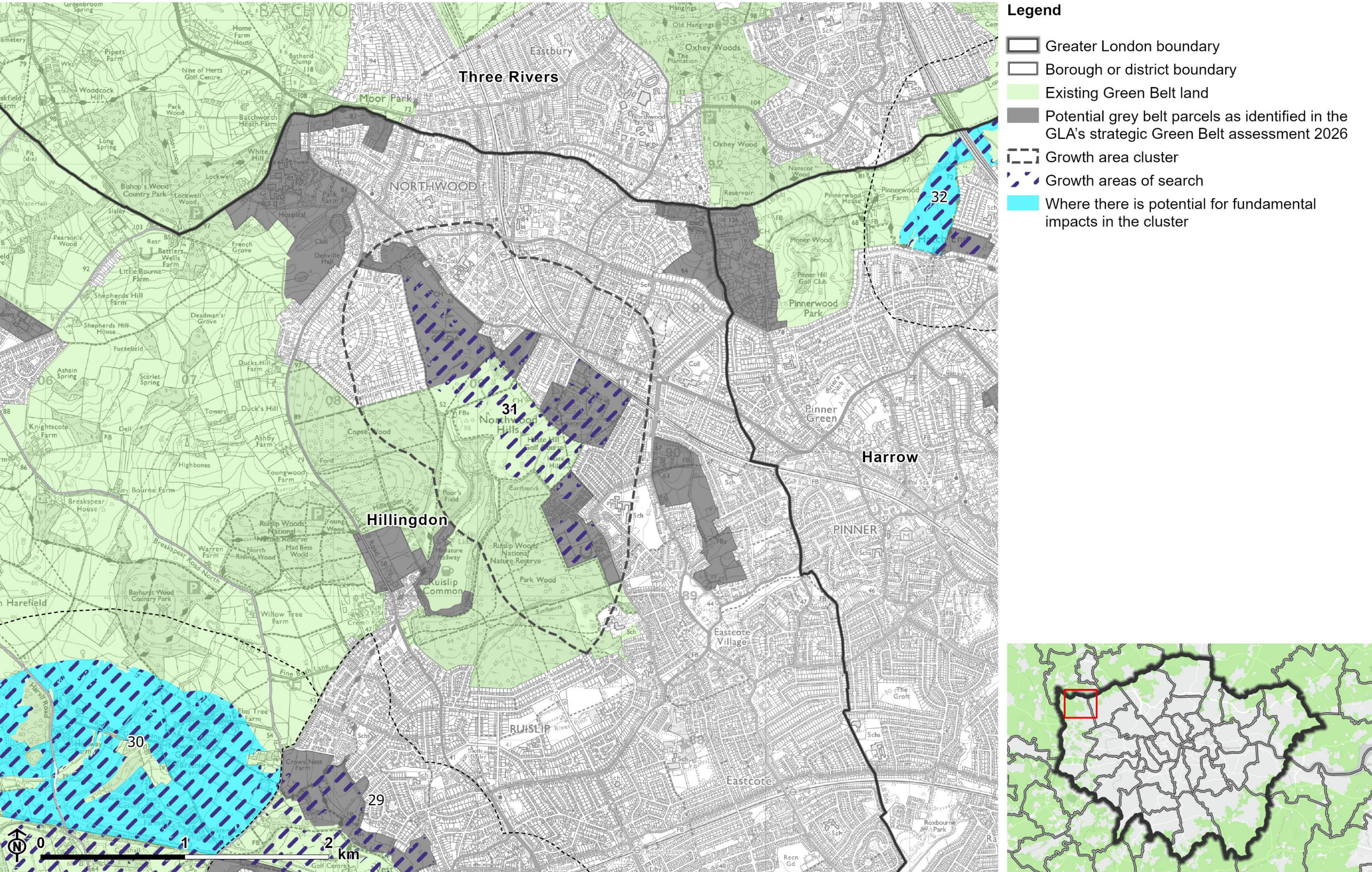
3.227 The release and development of the growth area is unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas. The remaining Green Belt land would likely continue to perform its current roles without being meaningfully undermined. With particular relevance to purposes A (checking the unrestricted sprawl of large built-up areas) and C (protecting the countryside from encroachment), the land is contained within the large built-up area and retained by the mature woodlands to the west. Furthermore, with regards to Purpose B (prevent neighbouring towns merging into one another) the wooded slopes directly beyond maintain wider separation between the neighbouring towns of Northwood and Ruislip as well as inhibiting the westward sprawl and encroachment of the countryside in the borough.

3.228 With regards to Purpose D (preserving the setting and special character of historic towns), no Green Belt land within this growth area cluster makes a strong contribution to the setting and special character of a historic town. Therefore, release and development in this area is unlikely to result in fundamental impacts on this purpose.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.229 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.32: Assessment of Fundamental Impacts within Eastcote and Northwood Growth Area of Search



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Cluster 32 – Hatch End

3.230 This potential growth cluster is located in the north of the London Borough of Harrow. The neighbouring districts of Hertsmere and Three Rivers lie directly to the north.

3.231 The area is made-up of three areas of search for potential growth:

- An area comprised of sports pitches west of Headstone Lane railway station, west of the urban edge of Harrow Weald.
- Scrubland south of the Blue Room Sports Bar.
- The open land surrounding the north western, northern, and north eastern urban edges of Hatch End, comprised of open fields and woodland blocks stretching from Pinnerwood Farm in the west to Bannister Sports Ground in the east.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.232 The release and development of the less contained open land west and east of the railway line connecting Greater London with South Oxhey has the potential to result in fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas) and B (preventing neighbouring towns from merging). With regards to Purpose A (checking the unrestricted sprawl of large built-up areas) the significant narrowing and perceived merging of the two urban areas (via Pinnerwood Farm and the Sylvia Avenue Open Space) would notably increase their combined sprawling incongruous influence to the north towards Watford.

3.233 With regards to Purpose B (preventing neighbouring towns from merging), the release and development would significantly narrow the gap between neighbouring towns of Pinner and South Oxhey, significantly increasing the potential for their perceived merging. However, it is acknowledged that there would still be a very narrow gap of open land and the wider Green Belt within the borough and neighbouring boroughs and districts also and would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

3.234 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land would continue to contribute to this purpose.

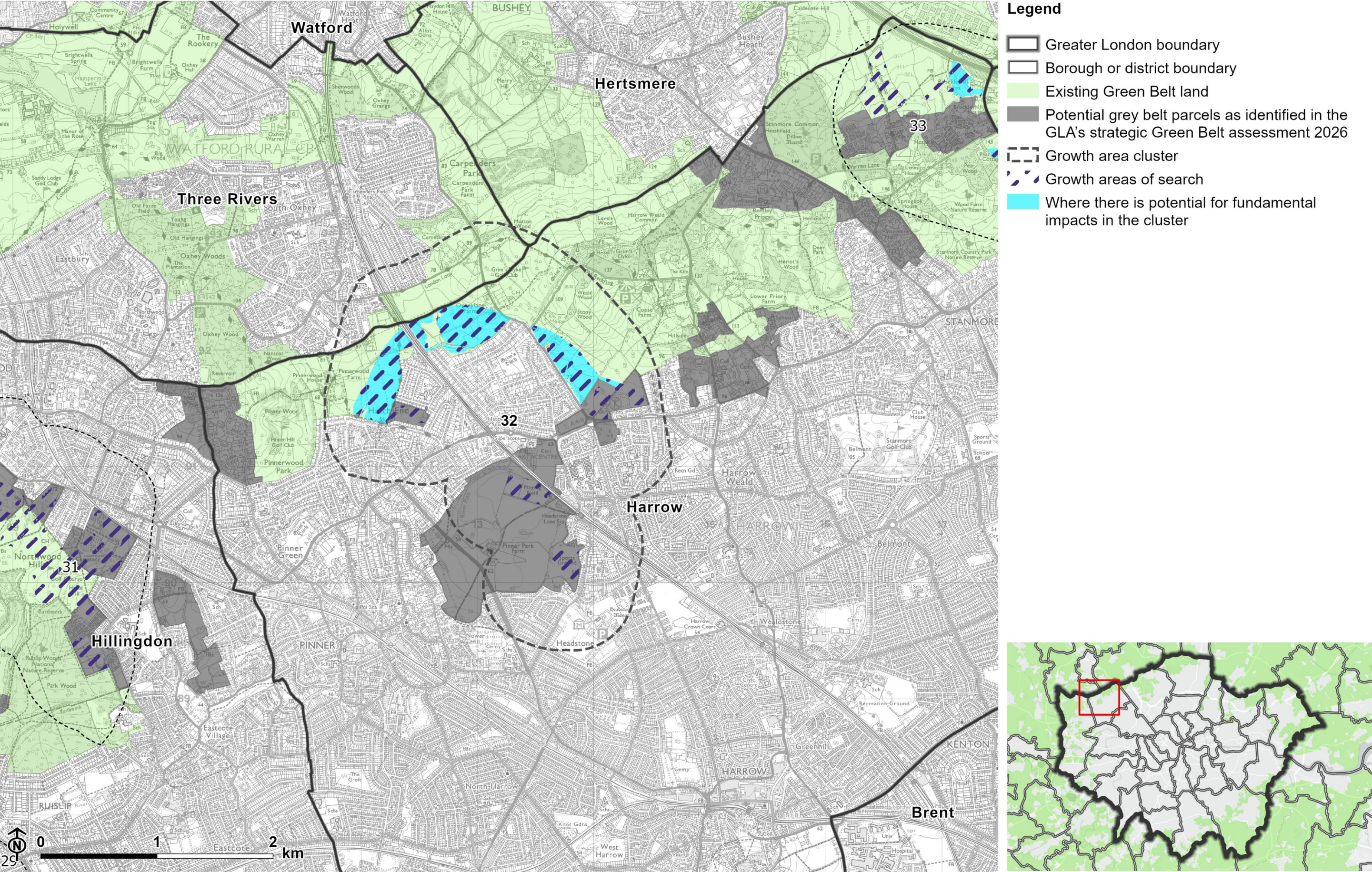
3.235 The open sloping ground east of Oxhey Lane forms an important part of the setting of the historic town of Harrow. Therefore, release and development in this area has potential to have a fundamental impact on Purpose D (preserving the setting and special character of historic towns). It forms part of an 'Area of Special Character' which provides a green backdrop of higher ground when viewed from the lower-lying suburban areas to the south. Pinner Hill is identified as an 'Area of Special Character' important to open setting to the north of Pinner. Any loss of openness in this area could have a meaningful impact on the ability of the remainder of the London Borough of Harrow's Green Belt land, to preserve the setting and special character of the historic towns. It is, however, also acknowledged that some release and development could be in keeping with or even enhance the visual, physical or experiential relationship between remaining open Green Belt land and a historic town.

3.236 The isolated release and development of the more contained, urbanised or developed parts of the growth areas in this cluster are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough and neighbouring plan areas. These areas generally make no more than a moderate contribution to the Green Belt purposes.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.237 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.33: Assessment of Fundamental Impacts within Hatch End Growth Area of Search



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Cluster 33 – Borehamwood, Edgware and Stanmore

3.238 This potential growth cluster is centred on areas for potential growth that straddle and lie in close proximity to the boundary of the London boroughs of Barnet and Harrow. The potential growth cluster is located in the north eastern corner of the London Borough of Harrow and the north western corner of the London Borough of Barnet. The neighbouring district of Hertsmere lies directly to the north.

3.239 The area is made-up of four areas of search for potential growth:

- Open fields north of the Royal National Orthopaedic Hospital and neighbouring development.
- Open fields east and west of Brockley Hill Road and Edgware Way (A41).
- An area of open countryside north of Edgware comprised of agricultural fields, woodland blocks and part of Edgwarebury Park.
- Open fields and woodland west of Barnet Way (A1) and south of Borehamwood.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.240 Release and development up to and including the northernmost parts of the growth areas west of Brockley Hill Road has the potential to result in fundamental impacts on Purposes A (checking the unrestricted sprawl of large built-up areas) and B (preventing neighbouring towns from merging). With regards to Purpose A (checking the unrestricted sprawl of large built-up areas), in combination, it would create an incongruous pattern of development by breaching strong physical features currently restricting and containing the urban areas to the north of the M1 in Elstree. It could also, but for the treelined M1, significantly increase the relationship or result in the perceived merging of Elstree with the Royal National Orthopaedic Hospital and urban edge of Stanmore, creating an almost continuous and incongruous finger of sprawl along connecting roads, significantly increasing their combined sprawling influence north of the M1 towards Borehamwood and beyond.

3.241 With regards to Purpose B (preventing neighbouring towns from merging), in combination, release and development would likely significantly impact perceived separation between the neighbouring towns of Borehamwood and Stanmore, via the intervening development in and around Elstree and the hospital along the connecting Brockley Hill Road/Elstree Hill South Road, Allum Lane and Barnet Lane. The same cannot be said for release and development in the other parts of the growth area

cluster where the M1 and wider woodland blocks act as more effective retaining and separating physical features and there are wider open areas of Green Belt land beyond in the London Borough of Barnet and neighbouring Hertsmere District. It is also acknowledged that the wider Green Belt within the borough and neighbouring boroughs and districts would also continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

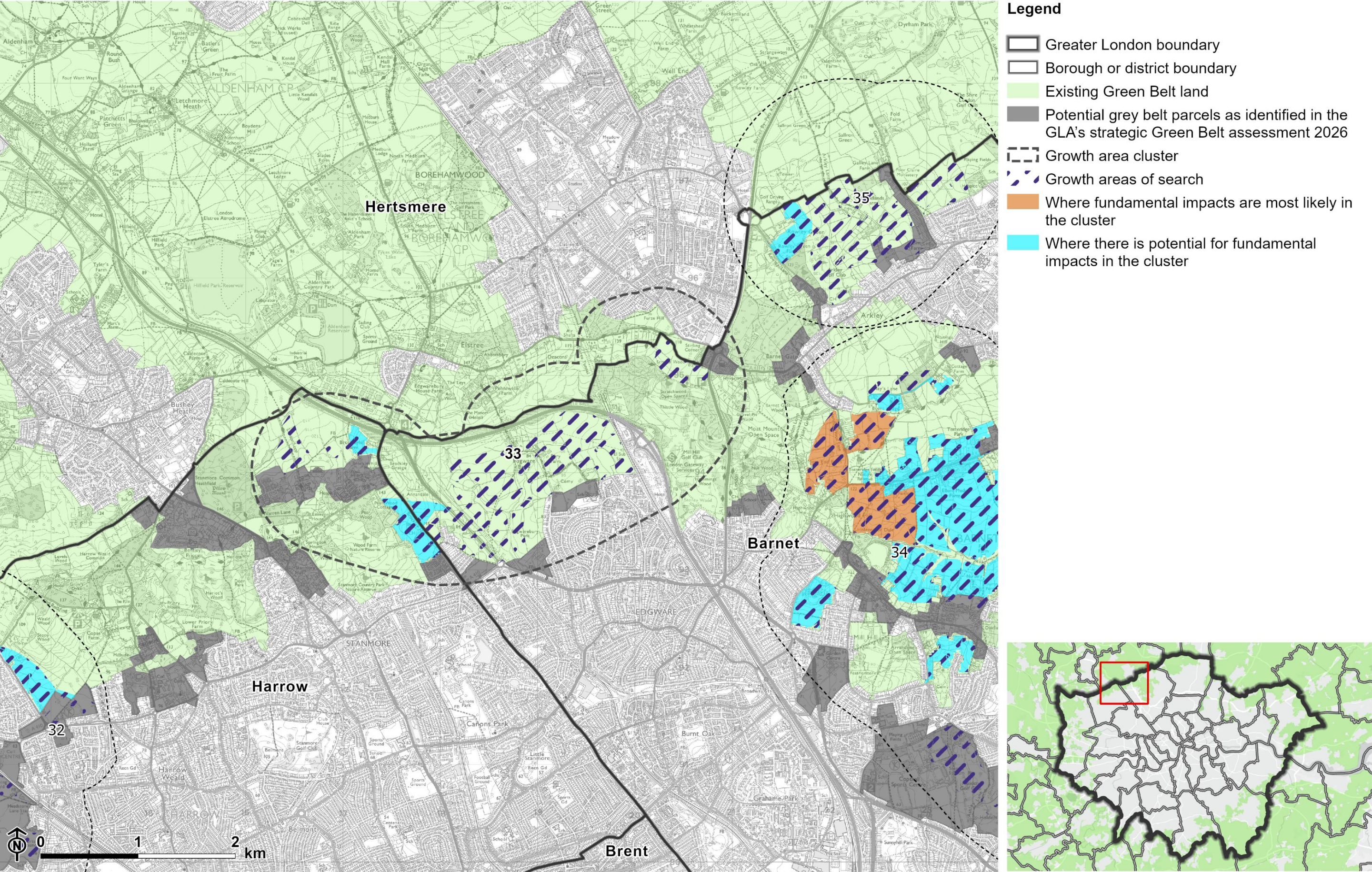
3.242 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land would continue to contribute to this purpose.

3.243 The release and development of the open portions of Stanmore Country Park and the open land west of Brockley Hill Road form an important part of the setting of the historic towns of Harrow and Stanmore and therefore have potential to have a fundamental impact on Purpose D (preserving the setting and special character of historic towns). They form part of an 'Area of Special Character' which provides a distinctive open setting to the north-east of Stanmore and a green backdrop of higher ground when viewed from the lower-lying suburban areas to the south including Harrow. Any loss of openness could have a meaningful impact on the ability of the remainder of the London Borough of Harrow's Green Belt land, to preserve the setting and special character of the historic towns. It is, however, also acknowledged that some release and development could be in keeping with or even enhance the visual, physical or experiential relationship between remaining open Green Belt land and a historic town.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.244 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.34: Assessment of Fundamental Impacts within Borehamwood, Edgware and Stanmore Growth Area of Search



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Cluster 34 – Mill Hill, Totteridge and High Barnet

3.245 This potential growth cluster is located in the centre of the London Borough of Barnet.

3.246 The area is made-up of seven areas of search for potential growth:

- Parts of the South Hertfordshire Golf Course, Wyatts Farm Open Space, allotments east of Brook Farm Open Space, the eastern half of High Barnet Park and associated and neighbouring playing fields to the south.
- The higher developed ground of The Ridgeway and Totteridge both connecting through to Highwood Hill and the sloping ground in between and adjacent to the Dollis Brook and Folly Brook.
- St Joseph's College Grounds.
- Woodland and the open field to the north and north east of Mill Hill Cemetery.
- Open fields north of The London Equestrian Centre, Partingdale Lane and Lullington Garth Road.
- Finchley Golf Course and the neighbouring Dollis Valley Allotments.
- The majority of Hendon Golf Course and the Metro Golf Centre, and the eastern edge of the Stone X Rugby Stadium.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.247 The isolated release and development of the portions of the growth areas in this cluster that already contain significant areas of development or are open but isolated from the wider open countryside by development along The Ridgeway and along Partingdale Lane and Lullington Garth Road are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the London Borough of Barnet. These areas generally make no more than a moderate contribution to the Green Belt purposes given their lack of openness, their isolation within the city and/or significant containment by it, limiting their relationship with the wider countryside and therefore impacts on purposes A (checking the unrestricted sprawl of large built-up areas), C (protecting the countryside from encroachment) and D (preserving the setting and special character of historic towns).

3.248 Although some of the growth areas within this cluster lie in fragile gaps between neighbouring towns in the borough, they all represent remanent gaps between towns that have already been merged either directly or indirectly via intervening urban areas. Furthermore, it is acknowledged that the wider Green Belt within the borough would continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole. In combination, these two factor limit how fundamental impacts on Purpose B (prevent neighbouring towns merging into one another) are likely to be in these locations.

3.249 The release and development of portions of the growth areas that lie within the Mill Hill Conservation Area and Totteridge Conservation Area, as well as the surrounding open valleys of the Folly Brook to the south and Dollis Brook to the north have the potential to have a fundamental impact on Purpose D (preserving the setting and special character of historic towns). The Mill Hill Conservation Area Character Appraisal Statement (2008) notes the topography of the area is one of its most notable features and has significantly shaped the way the historic town has developed, with development primarily focused on a high gravel ridge that runs on an east-west axis. The appraisal also notes that the area 'looks in both directions over Green Belt countryside' and that the elevated position 'allows long range views down to the north over open countryside and shorter range views to the south towards later suburban development'. Key views and vistas identified include: across the valleys into the Conservation Area from Totteridge Common and Totteridge Lane; from Holcombe Hill east towards Highwood Hill; and west from St Josephs Missionary College to undulating land and 1930's suburban estates. To the north of Mill Hill lies Totteridge Conservation Area. Although Totteridge is not a historic town in isolation, Totteridge Common Road (A5109) is noted as an important route linking the towns of Mill Hill, Whetstone and Barnet in the Totteridge Conservation Area Appraisal Statement (2008). The appraisal also notes that the area is 'set within green fields on three sides, sloping down to Dollis Brook to the north and Folly Brook to the south, giving these parts of the borough a distinctive character' forming part of a 'larger area of open land of high landscape quality, stretching westwards over parts of Harrow Weald' with its 'eastern boundary formed by the suburban development of Totteridge and Whetstone'. Any loss of openness of significant densification on the relatively sparse development in these areas could have a meaningful impact on the ability of the remainder of the London Borough of Barnet's Green Belt land, to preserve the setting and special character of the historic towns surrounding these important open geographical features. It is, however, also acknowledged that some release and development could be in keeping with or even enhance the visual, physical or

experiential relationship between remaining open Green Belt land and a historic town.

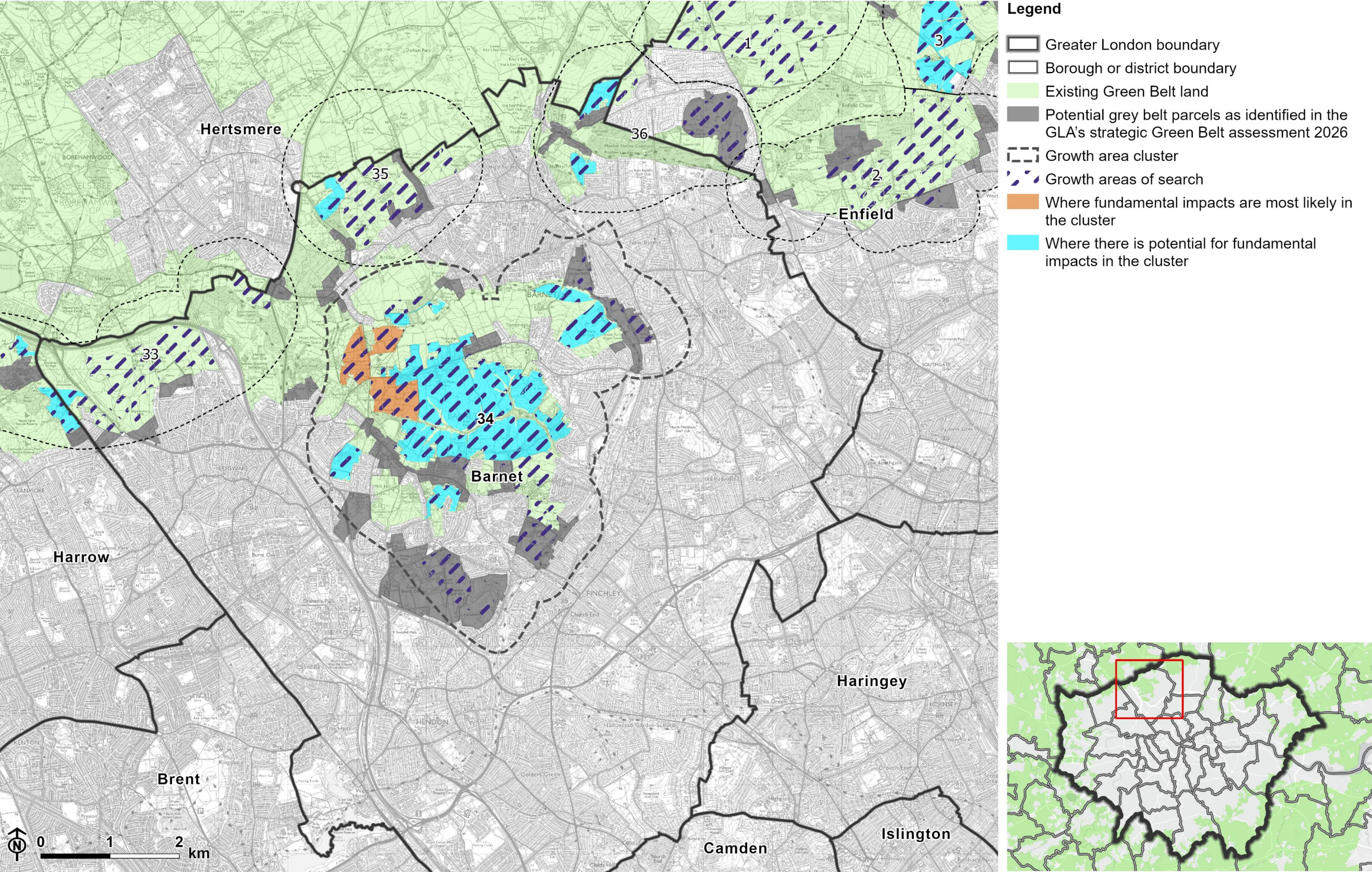
3.250 Release and development of the remaining open countryside connecting the borough's largest area of open countryside north and south of Totteridge in the valleys of the Dollis Brook and Folly Brook with the wider countryside to the west is more likely to have a fundamental impact on Purpose C (protecting the countryside from encroachment). Existing washed over development along Totteridge Common Road, Highwood Hill Road, Hendon Wood Lane and Mays Lane already combine to narrow the connection in this area, increasing the likelihood that further release and development in this area would have fundamental impacts on Purpose C (protecting the countryside from encroachment) east of Highwood Hill Road and Hendon Wood Lane.

3.251 The same cannot be said for the portions of the growth area to the north of Totteridge and south and west of the Dollis Brook or the Green Belt immediately north and south of Partingdale Lane and Lullington Garth Road. Although further release and development in these locations could sever areas of Green Belt land from the wider countryside, the neighbouring areas in these locations are already largely isolated, contained and/or urbanised by urban areas, limiting the potential for fundamental and wide ranging impacts to Purpose C (protecting the countryside from encroachment) in these locations.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.252 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.35: Assessment of Fundamental Impacts within Mill Hill, Totteridge and High Barnet Growth Area of Search



Cluster 35 – Land in between Barnet and Borehamwood

3.253 This area of search for potential growth is located in the far north of the London Borough of Barnet and directly neighbours Green Belt land in the district of Hertsmere to the north.

3.254 The area is made-up of a single area of search for potential growth in between Arkley merged with High Barnet to the south and east and Borehamwood to the west. The area is comprised of open agricultural fields and woodland blocks as well as Arkley Golf Course.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.255 The potential for fundamental impacts in this area are limited to release and development up to and including the open fields north of the woodland block of the Rowley Green Common Nature Reserve east of Rowley Lane. This woodland block is particularly sensitive as it currently maintains separation between the urban area of Greater London and Borehamwood. Consequently, its release and development has the potential to result in a fundamental impact on Green Belt Purpose A (checking the unrestricted sprawl of large built-up areas). In combination with the development along Paddock Lane, it would almost merge Borehamwood and Greater London, significantly increasing the perception of a new significant incongruous finger of urban sprawl near to Greater London of a scale not seen elsewhere within the London Borough of Barnet or neighbouring Hertsmere District.

3.256 Similarly, the perceived merging of the neighbouring towns of Borehamwood and High Barnet/Chipping Barnet (via Arkley) through release up to and including the woodland block also has the potential to have a fundamental impact on Green Belt Purpose B (preventing neighbouring towns merging into one another). However, it is acknowledged that there would be a very narrow gap of open land north of Paddock Lane and east of the Barnet Bypass. Furthermore, the wider Green Belt within the boroughs and neighbouring district would also continue to perform a meaningful role in maintaining separation between other neighbouring towns, calling into question whether the loss of just one of many gaps between towns in each plan area would be sufficiently meaningful as to result in a fundamental impact on the wider Green Belt within a plan area as a whole.

3.257 Limiting release and development to elsewhere within the growth area is unlikely to result in fundamental impacts to the Green Belt land within the London Borough of Barnet of the neighbouring District of Hertsmere, largely due to the fact that separation between Greater London and its towns and Borehamwood could be maintained.

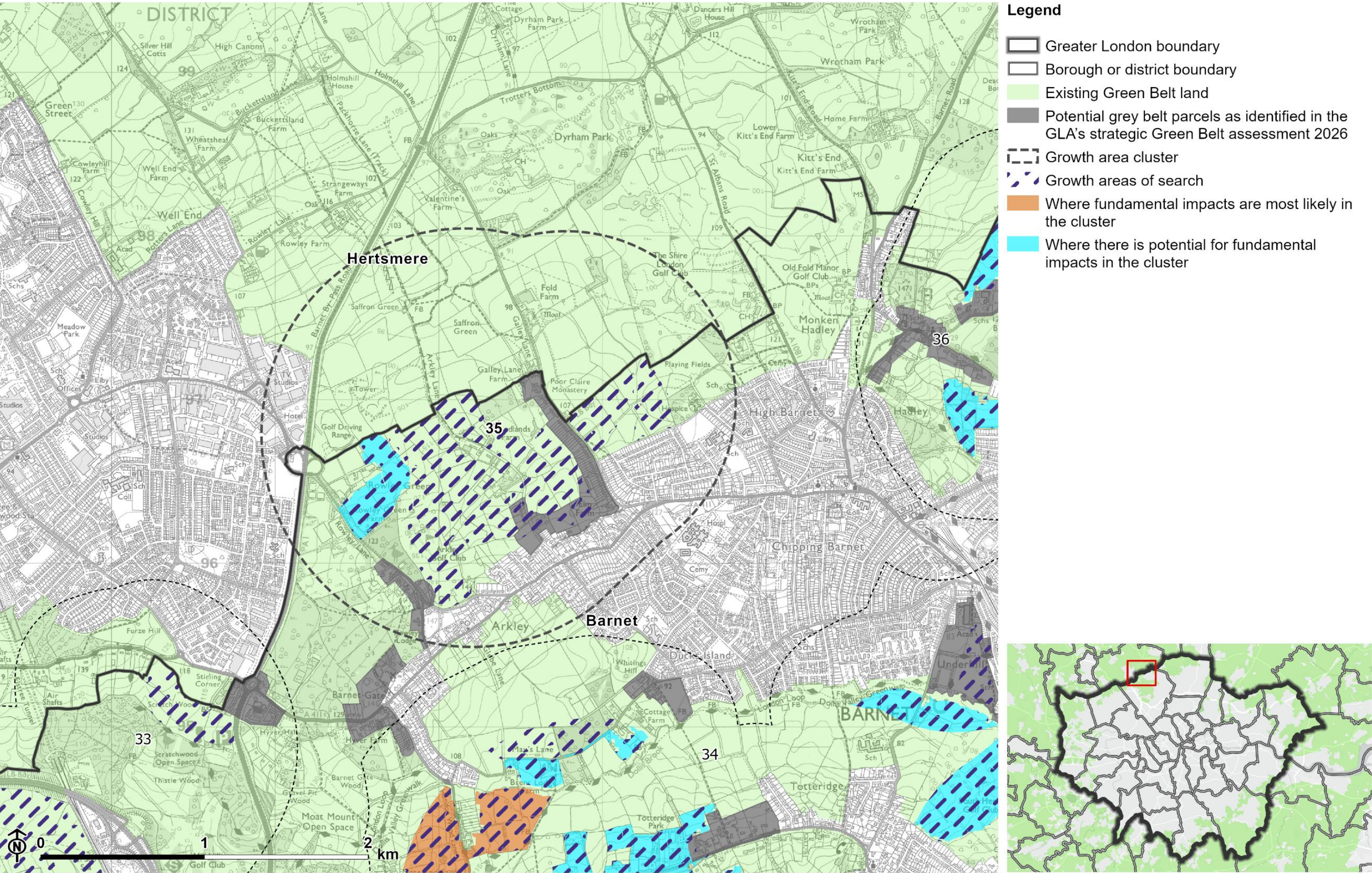
3.258 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land to the north, east and south west would continue to contribute to this purpose.

3.259 The portion of the growth area located to the east of Galley Lane sits on open land that provides a wider setting of the historic town of Chipping Barnet west of Monken Hadley Conservation Area, making a moderate contribution to Purpose D (preserving the setting and special character of historic towns). However, there are no important visual, physical, or experiential relationships to historic aspects of the historic town of Chipping Barnet, limiting the potential for meaningful fundamental impacts on this Green Belt purpose in this location.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.260 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.36: Assessment of Fundamental Impacts within Land in between Barnet and Borehamwood Growth Area of Search



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Cluster 36 – Hadley

3.261 This potential growth cluster is located in the far north of the London Borough of Barnet and far west of the London Borough of Enfield and also directly neighbours Green Belt land in the district of Hertsmere to the north.

3.262 The area is made-up of three areas of search for potential growth:

- The eastern meadows and woodland blocks of King George's Fields to the north of High Barnet Railway Station.
- Open agricultural fields to the west of Monken Hadley and north of Camlet Way.
- Large portions of Hadley Wood Golf Course.

Likelihood of fundamental impacts on plan areas as a result of release and development in this cluster

3.263 The isolated release and development of the majority of the growth areas in this cluster are unlikely to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough and neighbouring plan areas. This includes the isolated release and development of all areas of existing developed and urbanised land in the growth areas, which generally make no more than a moderate contribution to the Green Belt purposes.

3.264 Release and development in the cluster would not represent an incongruous pattern of development because the existing containment of Hadley Wood and development along Hadley Common Road and Camlet Way associated with Monken Hadley and Hadley Wood, respectively, which already have a localised incongruous impact in this area, limiting the potential for fundamental impacts on Purpose A (checking the unrestricted sprawl of large built-up areas).

3.265 Release and development north of Camlet Way lies within a moderate gap between the neighbouring towns of New Barnet/Enfield and Potters Bar (via Hadley Wood). Given Hadley Wood extends further northwards towards Potters Bar to the north east, there is limited possibility of fundamental impacts on Purpose B (preventing neighbouring towns from merging) in this part of the growth area cluster. Similarly, although King George's Fields maintains what remains of the partial separation between Chipping Barnet and New Barnet, the neighbouring towns are already merged directly to the south, limiting the potential for fundamental impacts on Purpose B (preventing neighbouring towns from merging). Finally, Hadley Wood Golf

Course is contained by the urban area of Hadley Wood, limiting its role in maintaining separation between the neighbouring towns of New Barnet/Enfield and Potters Bar (via Hadley Wood).

3.266 Release and development of Green Belt land in this growth area cluster is not considered to be at risk of fundamentally undermining remaining Green Belt land's contribution to Purpose C (protecting the countryside from encroachment). The wider Green Belt land neighbouring the potential growth areas would continue to contribute to this purpose. In particular, Monken Hadley Common is already somewhat isolated from the wider countryside by the development along Hadley Common Road and Camley Way. However, in combination with the woodland of Hadley Wood to the east and the western half of King George's Fields the common does maintain what remains of the physical connection between the Green Belt land in this area and the wider countryside to the west and north.

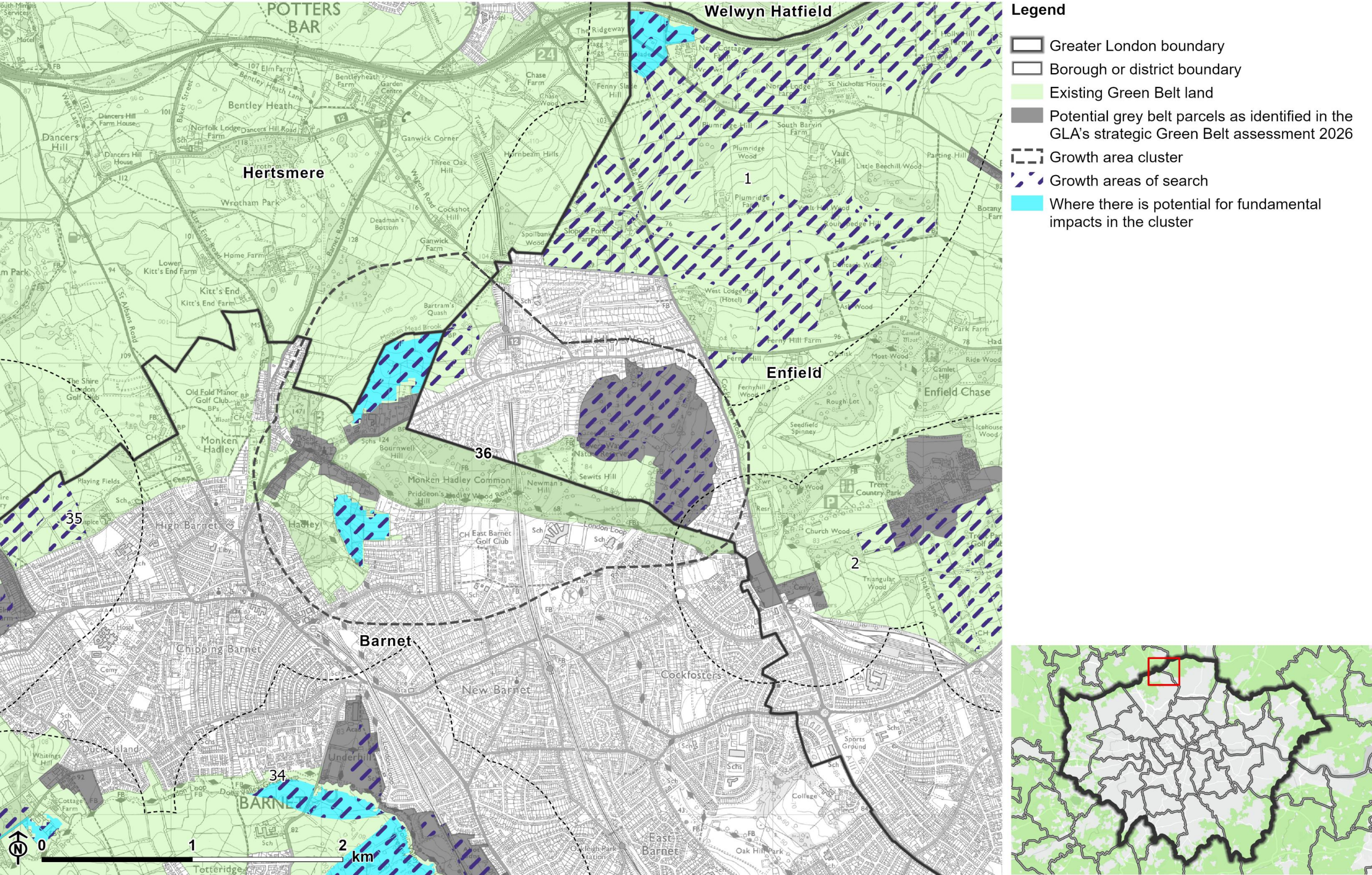
3.267 Release and development in the least urbanised parts of the King George's Fields and the open fields north of the development north of Camlet Way have the potential to have some fundamental impacts in Green Belt terms. These open areas form part of the Monken Hadley Conservation Area, which includes the northern end of Chipping Barnet High Street. These open areas form part of a distinctive landscape setting to the north-east of the historic town of Chipping Barnet. Any loss of openness in this location could have a meaningful impact on the ability of the remainder of the London Borough of Barnet's Green Belt land to preserve the setting and special character of the historic town of Chipping Barnet. It is, however, also acknowledged that some release and development could be in keeping with or even enhance the visual, physical or experiential relationship between remaining open Green Belt land and a historic town.

3.268 The two neighbouring fields in the London Borough of Enfield, east of the more open land directly north of the development north of Camlet Way lie immediately east of the Monken Hadley Conservation Area, making a moderate contribution to Purpose D (preserving the setting and special character of historic towns). Therefore, development in these two fields are less likely to result in a fundamental impact on Purpose D (preserving the setting and special character of historic towns), given they only form part of the wider setting of the historic town of Chipping Barnet.

Likelihood of fundamental impacts on plan areas as a result of combined releases and developments in multiple growth area clusters

3.269 Release and development in other potential growth areas in combination with release and development in this cluster of potential growth would not generate additional impacts that would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the borough or neighbouring plan areas.

Figure 3.37: Assessment of Fundamental Impacts within Hadley Growth Area of Search



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Conclusion

3.270 As outlined in Chapter 1, the London-wide Green Belt study cannot in isolation identify land that is suitable for development, or set out the necessary exceptional circumstances for releasing land from the Green Belt. This will be done by considering a range of factors and evidence being prepared by the GLA and the London boroughs. This assessment does not attempt to definitively judge whether the release and development of any parts of Greater London's Green Belt would give rise to fundamental impacts on what could remain of the designation within each borough.

3.271 It is reasonable to conclude however that no combination of proposals within a single London borough are capable of fundamentally undermining the purposes (taken together) of the remaining Green Belt across Greater London as a whole. This is because no single London borough includes a significant enough development need and proportion of the whole Greater London's Green Belt land for this to be a reasonable scenario. Based on the assessments of the clusters assessed to date, it is unlikely that the cumulative release and development of combinations of sites in these specific locations would generate fundamental impacts for Greater London as a whole, but this will need to be reviewed further once the final extent of the preferred areas of growth are known (ie following consultation on the draft London Plan). For example, as and when each London borough determines the extent of its planned Green Belt release, each London borough should consider its fundamental impacts on Greater London's Green Belt as a whole in-combination with the growth planned in adopted Local Plans in neighbouring local authority areas. The contents of this report and wider Greater London Green Belt Study should be a helpful reference point in reaching these judgements.

Report produced by LUC

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Bristol

12th Floor, Beacon Tower, Colston Street, Bristol BS1 4XE
0117 389 0700
bristol@landuse.co.uk

Cardiff

Room 1.04, 1st Floor, Brunel House, 2 Fitzalan Rd, Cardiff CF24 0EB
0292 254 0920
cardiff@landuse.co.uk

Edinburgh

Atholl Exchange, 6 Canning Street, Edinburgh EH3 8EG
0131 326 0900
edinburgh@landuse.co.uk

Glasgow

37 Otago Street, Glasgow G12 8JJ
0141 403 0900
glasgow@landuse.co.uk

London

250 Waterloo Road, London SE1 8RD
020 7199 5801
london@landuse.co.uk

Manchester

4th Floor, 57 Hilton Street, Manchester M1 2EJ
0161 802 2800
manchester@landuse.co.uk

Sheffield

32 Eyre Street, Sheffield, S1 4QZ
0114 392 2366
sheffield@landuse.co.uk

landuse.co.uk

Landscape Design / Strategic Planning & Assessment / Transport Planning
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