

London Borough of Hounslow
Green Belt Review
Final Report

240050-00

Final Report | 29 April 2015

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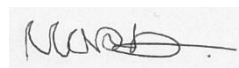

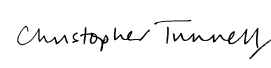
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1 Introduction

1.1 Purpose of Study

Arup were appointed by the London Borough of Hounslow (LBH) to undertake a Green Belt Review as part of the evidence base for the West of Borough Plan. The purpose of a Green Belt Review is to consider whether existing areas of designated Green Belt meet the five purposes set out in the National Planning Policy Framework (NPPF); in particular, when an authority is considering the balance of supply and demand for land as part of the development of a spatial strategy for the Local Plan. A boundary revision can take the form of an expansion or a contraction. However, equally a Green Belt Review may conclude that no changes are appropriate.

This Green Belt Review provides an independent and objective appraisal of all the existing Green Belt land as well as non-Green Belt land in the west of the Borough. This review was undertaken in accordance with the study brief, which is clear in its aspirations to:

- Test the current performance of the Borough's designated Green Belt against the five purposes set out in the NPPF;
- Identify land with little or no justification for continued protection as Green Belt under the NPPF and Local Plan; and
- Provide the basis for a Stage 2 assessment (not included in this report) which will consider the future of land no longer identified as meeting Green Belt purposes.

1.2 Report Structure

This report sets out:

- The national, regional and local policy context for Green Belt and good practice guidance for undertaking Green Belt Reviews.
- The historic context for the Hounslow Green Belt.
- The methodology used for the review, which was undertaken in two phases.
- Summary of the key findings from the Stage 1A assessment (see Annex 1 for detailed pro formas).
- Details of the Stage 1B Assessment, including the Landscape Appraisals (see Annex 1 for detailed pro formas).
- Summary of the key findings to identify land parcels that are serving Green Belt purposes less strongly, that might be examined further in Stage 2.
- Overall conclusions regarding potential revisions to the Green Belt.

2 Policy, Guidance and Experience

Planning Policy Context

The National Planning Policy Framework (NPPF) (2012), the London Plan (2011), the saved policies in the adopted Unitary Development Plan (UDP) (2003) and the emerging Local Plan (2014) provide the policy context for the role and function of the Green Belt. The following section summarises the key policy statements.

2.1 National Policy

The NPPF (2011) sets out the Government's planning policies for England and how these are expected to be applied. Central to the NPPF is the "presumption in favour of sustainable development" which for plan-making means that local planning authorities should positively seek opportunities to meet development needs and should meet objectively assessed needs unless specific policies of the NPPF (such as Green Belt policy) indicate that development should be restricted.

Protection of the Green Belts around urban areas is a core planning principle of the NPPF. Policy for protecting Green Belt land is set out in section 9 of the framework which emphasises the great importance that the Government attaches to Green Belts.

Circular 42/55 released by government in 1955 highlighted the importance of checking unrestricted sprawl of built-up areas and of safeguarding countryside from encroachment. It set out three main functions of the Green Belt which are now upheld in the NPPF: to check the growth of a large built-up area; to prevent neighbouring settlements from merging into one another; and to preserve the special character of a town.

The NPPF advocates openness and permanence as essential characteristics of the Green Belt stating that *'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open'* (paragraph 79). The NPPF details five purposes of the Green Belt:

- *'To check the unrestricted sprawl of large built-up areas;*
- *To prevent neighbouring towns merging into one another;*
- *To assist in safeguarding the countryside from encroachment;*
- *To preserve the setting and special character of historic towns; and*
- *To assist in urban regeneration, by encouraging the recycling of derelict and other urban land'.* (Paragraph 80)

For ease of reference in this review, these purposes are referred to as NPPF Purposes 1 to 5, with the assigned number corresponding to the order in which the purposes appear in the NPPF.

In addition to the purposes of the Green Belt, the NPPF advocates enhancement to existing Green Belts. Paragraph 81 states that *'local planning authorities are required to plan positively to enhance the beneficial use of the Green Belt'* once Green Belt boundaries have been defined including looking for opportunities to:

- *'Provide access;*

- *Provide opportunities for outdoor sport and recreation;*
- *Retain and enhance landscapes, visual amenity and biodiversity; or*
- *Improve damaged and derelict land’.*

Paragraph 83 states that *‘local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans’* and that *‘once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan’*. Importantly the NPPF acknowledges the permanence of Green Belt boundaries and the need for Green Belt boundaries to endure beyond the plan period (paragraph 83). The need to promote sustainable patterns of development when reviewing the Green Belt boundaries is also acknowledged (paragraph 84).

Further, when defining Green Belt boundaries local planning authorities should ensure consistency with the Local Plan strategy for sustainable development, only include land which is necessary to be kept permanently open, be satisfied that Green Belt boundaries should not need to be altered at the end of the plan period, and use permanent and recognisable physical features to define boundaries (paragraph 85).

2.2 Regional Policy

The London Plan (2011) sets out the Mayor’s spatial development strategy for the capital. It emphasises the role of the Green Belt in sustainable development stating that *‘the Mayor will seek to manage growth to ensure it takes place in the most sustainable way possible - within the existing boundaries of Greater London, and without encroaching on the Green Belt or London’s other open spaces’*. This objective is reaffirmed in Policy 1.1.

Additionally Policy 7.16 (Green Belt) sets out the Mayor’s strong support for *‘the current extent of London’s Green Belt, its extension in appropriate circumstances and its protection from inappropriate development’*. The Green Belt is acknowledged for the role it plays in multifunctional green infrastructure, and improvements to overall quality and accessibility are encouraged.

In October 2013, Revised Early Minor Alterations to the London Plan were published, updating policies to include reference to paragraphs 79-92 of the NPPF on Green Belts. Further Alterations to the London Plan were adopted in March 2015 and published in the London Plan Consolidated with Alterations since 2011... No alterations to Green Belt policies are included.

2.3 Local Policy

Unitary Development Plan (2003)

The UDP was approved in December 2003 and was subsequently amended and saved by the Secretary of State in 2007. As new Local Plan documents are adopted, the UDP will be replaced.

The UDP affirms that the Green Belt is *‘one of the borough’s most valuable natural assets’* and that *‘one of the borough’s most important planning functions is to protect and improve the Green Belt and restrict the spread of urban development’*.

The UDP also acknowledges that much of the borough's Green Belt land is degraded and underutilised.

Objective ENV-N.1 establishes LB Hounslow's aim *'to protect, maintain and improve the open nature, amenity, ecological value, recreational value and the quality'* of open spaces including land in the Green Belt.

Policy ENV-N.1.1 relates to the purposes of including land in and objectives for the use of land in the Green Belt. The policy asserts that the main aim of the Green Belt in Hounslow is *'to prevent urban sprawl by keeping land permanently open'*. It sets out four purposes for including land in the Green Belt in Hounslow:

- *'To prevent neighbouring built-up areas from merging into one another;*
- *To check the unrestricted sprawl of Greater London;*
- *To assist in safeguarding the countryside from encroachment, and*
- *To assist in urban regeneration by encouraging the recycling of derelict and other urban land.'*

The policy also recognises the contribution of the Green Belt to enjoyment of open areas. These purposes therefore reflect the purposes of the NPPF with the understandable exception being that no reference is made to the Green Belt purpose relating to historic towns.

The vulnerability of the Hounslow Green Belt is also recognised due to intense development pressure relating to its location on London's edge and its fragmented character. Policy ENV-N.1.1 sets out a commitment to safeguard the permanence and integrity of the Green Belt by ensuring it is kept permanently open and by establishing measures to improve land in the Green Belt, reflected again in Policy ENV-N.1.3 (Green Belt Improvements).

To this end, the UDP includes Policy IMP.5.3 (Comprehensive Project Areas), which designates areas including all of Hounslow's Green Belt land and adjoining areas with the potential for *'restoration and landscape improvements, improved public access and recreation facilities, and/or nature conservation enhancement/protection'*. The policy also sets out the efforts that will be made to remove inappropriate, and thus harmful, Green Belt uses.

Policy ENV-N.1.2 (Acceptable Development in the Green Belt) establishes a general presumption against inappropriate development in the Green Belt. Acceptable uses are:

- *'Agriculture and forestry;*
- *Essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of the Green Belt; or*
- *Limited extension, alteration or replacement of existing dwellings.'*

Additionally, limited infilling relating to continuation of the existing use at Kempton Water Treatment Works will be permitted where it meets prescribed provisions. The site is designated as a 'major existing developed site within the

Green Belt'¹. Furthermore, reuse of existing buildings in the Green Belt is not defined as inappropriate development.

Policy ENV-N.1.4 (Development near the Green Belt Boundary) requires development proposals to be '*designed so that it does not detract from the open aspect or visual amenities of the Green Belt*'.

Local Plan Proposed Submission with Minor Changes (2014)

The Local Plan and supporting evidence base was submitted to the Secretary of State for examination in August 2014 and is therefore treated as a material consideration in the determination of planning decisions. Upon adoption, the Local Plan will replace all the saved policies in the UDP.

The Local Plan Submission recognises the role of Green Belts in limiting urban sprawl and keeping land permanently open, assisting safeguarding the countryside, preserving green infrastructure and biodiversity and supporting urban regeneration through the re-use of existing urban land. The role of the space in linking the borough to the Green Grid is also recognised.

The Local Plan Proposed Submission with Minor Changes states that through the West of the Borough Plan, LBH will test the performance of the Green Belt against the five purposes of the NPPF to ensure a robust and up to date Green Belt boundary is in place and to assess the borough's capacity to meet objectively assessed housing need.

Policy GB1 (Green Belt and Metropolitan Open Land) sets the approach to the Green Belt as protection and enhancement of the Green Belt '*to maintain its openness, quality and permanence*'. The policy states that LBH will achieve this by '*establishing a Green Belt boundary to ensure that it is strong and permanent...ensuring that any development is appropriate and meets the purposes of the Green Belt...and working with partners to improve access to the Green Belt*'.

Key messages relating to the Green Belt from Regulation 19 responses included:

- The role of the blue ribbon network should be recognised.
- Acknowledgement that a full review of Green Belt boundaries will be carried out in a separate sites allocation document.
- Objections to the proposed Green Belt boundary changes at land South of Staines Road and at the Dairy Crest site at Snakey Lane, Feltham on the basis that they are inconsistent with the NPPF.
- An emphasis on the use of brownfield sites should be included in policy.
- Further clarity is required in policy GB1 in relation to appropriate development of outdoor sports facilities in the Green Belt.
- Support for a comprehensive view of the Green Belt beyond the existing background paper in line with the NPPF.

¹ This policy designation is no longer referenced specifically in national policy; local authorities can now set their own approach to the redevelopment of previously developed land in the Green Belt.

Subsequent to the Regulation 19 publication, consultation on the soundness and legal compliance of suggested minor changes to the Local Plan Proposed Submission has been undertaken, which was completed in December 2014.

Green Belt Guidance

2.4 National Planning Practice Guidance

The national Planning Practice Guidance (PPG) is intended to provide up to date, accessible and useful guidance on the requirements of the planning system. The national PPG was updated in October 2014, reiterating the importance of the Green Belt and acknowledging that Green Belt may restrain the ability to meet housing need. The following paragraphs are relevant to Green Belt Review.

- **Paragraph 034 In decision taking, can unmet need for housing outweigh Green Belt Protection?** – *‘Unmet housing need (including for traveller sites) is unlikely to outweigh harm to the Green Belt and constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.’*
- **Paragraph 044 Do housing and economic needs override constraints on the use of land, such as Green Belt?** – *‘The NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole, or specific policies in the Framework indicate that development should be restricted’ (as it is with land designated as Green Belt). ‘The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.’*
- **Paragraph 045 Do local planning authorities have to meet in full housing needs identified in needs assessments?** – *‘Assessing need is just the first stage in developing a local plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.’*

However, the national PPG does not provide any specific guidance on conducting a Green Belt Review per se.

2.5 Planning Advisory Service Guidance (2014)

The Planning Advisory Service (PAS) published guidance for Green Belt Review in January 2014 in the context of the need to accommodate strategic housing (and employment) requirements. The guidance highlights that *‘the purpose of a review is for the identification of the most appropriate land to be used for development, through the local plan. Always being mindful of all of the other planning matters to be taken into account and most importantly, as part of an overall spatial strategy.’*

Emphasis is placed on the need for assessment against the five purposes of the Green Belt in the first instance. The guidance acknowledges that there are planning considerations, such as landscape quality, which cannot be a reason to designate an area as Green Belt, but that could be a planning consideration when seeking suitable locations for development.

The guidance outlines considerations to be made in relation to the five purposes as set out below:

- **Purpose: to check the unrestricted sprawl of large built up areas** - consider the meaning of sprawl compared to 1930's definition, and whether positively planned development through a local plan with good masterplanning would be defined as sprawl.
- **Purpose: to prevent neighbouring towns from merging into one another** - the purpose does not strictly suggest maintaining the separation of small settlements near to towns. The approach will be different for each case. The identity of a settlement would not be determined solely by the distance to another settlement; the character of the place and of the land in between must be taken into account. A 'scale rule' approach should be avoided. Landscape character assessment is a useful analytical tool for this type of assessment.
- **Purpose: to assist in safeguarding the countryside from encroachment** - Seemingly, all Green Belt does this so distinguishing between the contributions of different areas to this purpose difficult. The recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open, accounting for edges and boundaries.
- **Purpose: to preserve the setting and special character of historic towns** – it is accepted that in practice this purpose relates to very few settlements.
- **Purpose: to assist in urban regeneration by encouraging the recycling of derelict and other urban land** – the amount of potentially developable land within urban areas must have already been factored in before Green Belt land is identified. All Green Belt would achieve this purpose to the same extent, if it does achieve the purpose, and the value of land parcels is unlikely to be distinguishable on the basis of this purpose.

The PAS guidance additionally recognises the relevance of the Duty to Cooperate, as set out in the Localism Act 2011, and soundness tests of the NPPF to Green Belt consideration. The NPPF requires local planning authorities to '*work collaboratively with other bodies to ensure strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans*' (paragraph 179). Additionally the level of housing that a local authority is required to plan for is also determined by whether there is an 'unmet requirement' from a neighbouring authority (paragraph 182).

The guidance recognises that Green Belt is a strategic policy and hence a strategic issue in terms of the Duty to Cooperate. Areas of Green Belt should therefore be assessed collectively by local authorities. This is important particularly for areas of Green Belt land that fall into different administrative areas, and the significance attached to that land.

Experience Elsewhere

2.6 Neighbouring Authorities' Experience

This study only covers the areas of the Green Belt falling within Hounslow's administrative boundary. However, the draft methodology was shared and discussed with the neighbouring and wider partner authorities² and the comments received taken into account as the study progressed.

It is important to understand how each of the neighbouring local authorities are approaching Green Belt issues and the methodology employed in any Green Belt Reviews they have undertaken. Green Belt in adjoining boroughs (Map 2.1) may achieve the purpose of checking unrestricted sprawl from the urban areas both within and outside Hounslow. It may also play a role in protecting strategic gaps between urban areas and settlements both within and outside Hounslow. The potential release of any Green Belt land within or outside Hounslow may impact on settlement patterns and the role of the Green Belt within the wider area. Close liaison with neighbouring authorities is important to understand the role of the Green Belt and the impacts of release at a strategic level.

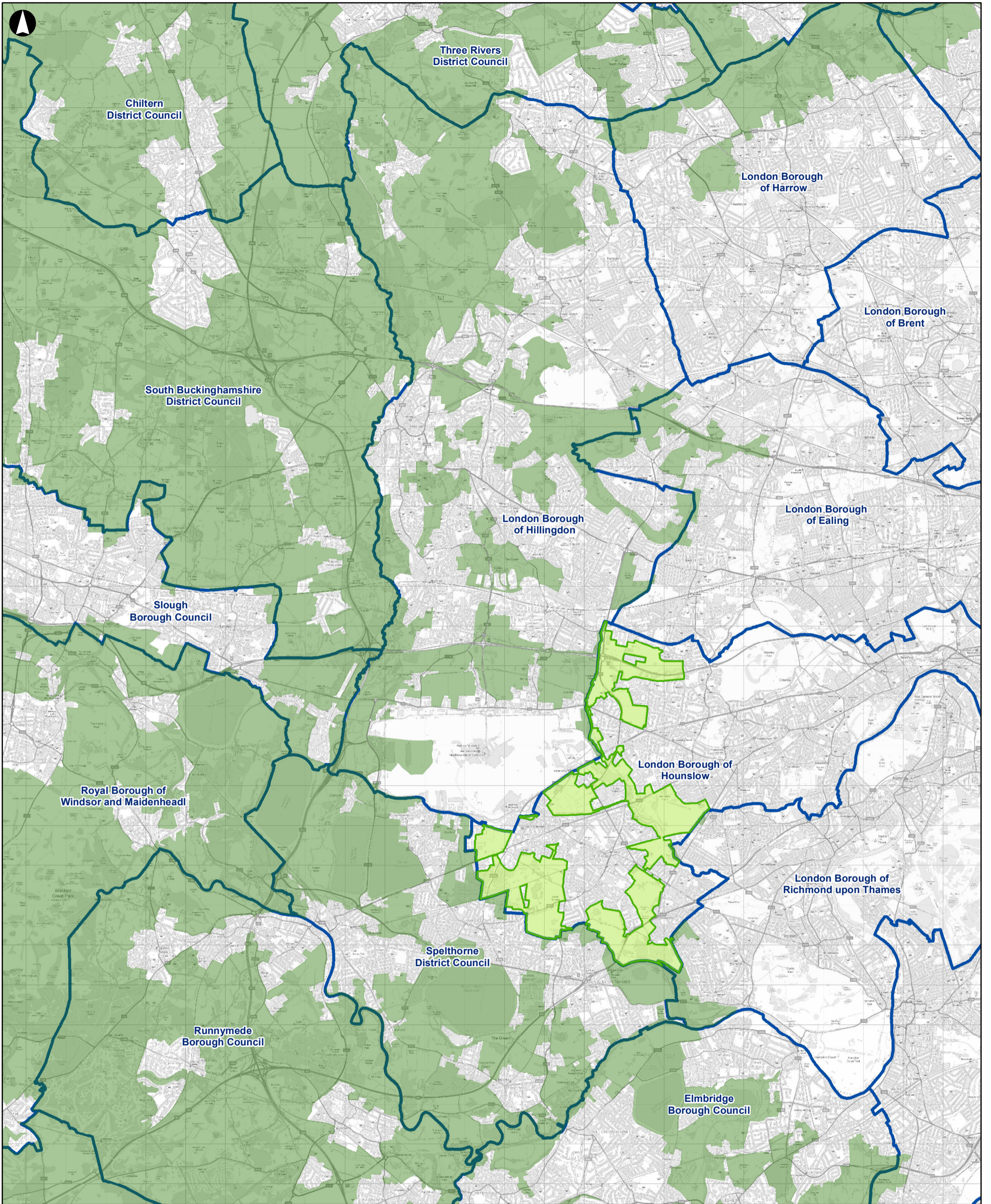
The approaches taken in the neighbouring authorities have been summarised below based on a review of material available on the authorities' websites (Table 2.1). This table was shared with the authorities concerned for validation and no comments were received.

In summary:




- Four authorities, (Spelthorne Borough Council, London Borough of Richmond Upon Thames, London Borough of Ealing, and London Borough of Hammersmith and Fulham), have not, to date, undertaken a Green Belt Review. Spelthorne Borough Council and the London Borough of Richmond indicate that development needs can be met without the loss of Green Belt land and it is assumed that this is also the case for the London Borough of Ealing. The London Borough of Hammersmith and Fulham does not have designated Green Belt land within its boundary.

One authority (London Borough of Hillingdon) conducted a Green Belt Review in 2006. This review was intended to address a previous commitment to examine all sites specifically identified in the Hillingdon UDP Inspector's Report (1995) during the next Green Belt Review and therefore did not consider all land within the Green Belt. The borough did not anticipate the need for major adjustments to Green Belt boundaries to accommodate development needs of the borough.

² The draft methodology was shared with the following authorities: London Borough of Barnet, London Borough of Ealing, London Borough of Hillingdon, Runnymede District Council and Spelthorne District Council.



Legend

-  Borough Boundary
-  Hounslow Green Belt
-  Neighbouring Green Belt

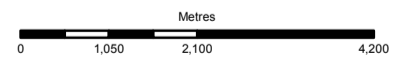
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Map 2.1 Hounslow and Neighbouring Authorities' Green Belt

Scale at A3

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Table 2.1: Green Belt Approaches in Neighbouring Authorities

Authority	Local Plan Status	Green Belt Context	Green Belt Review	Methodology/Conclusions from Green Belt Review
London Borough of Hillingdon	Hillingdon's Local Plan: Part 1 Strategic Policies was adopted in November 2012. The Local Plan Part 2 is at proposed submission consultation stage and includes Development Management Policies, Site Allocations and Designations and Policies Map.	The borough has 4,970 hectares of Green Belt. The Hillingdon Local Plan (2012) states that the main purpose of Hillingdon's Green Belt is to keep land open and free from development, to maintain the character and identity of individual settlements and to make a clear distinction between rural and urban environments. The Green Belt Study (2006) is being reviewed and recommendations for minor adjustments to address boundary anomalies to the Green Belt are being considered. However the Council does not consider that major adjustments to Green Belt boundaries are necessary to accommodate growth over the plan period. Minor adjustments to the Green Belt boundary will be undertaken as part of the Local Plan Part 2. The review in the context of potential to release land for schools and minerals extraction if required.	The Green Belt and Major Developed Sites Assessment (2006)	<p>Conducted pre NPPF publication; although Planning Policy Guidance Note 2 (Green Belts) set out the same Green Belt purposes contained in the NPPF.</p> <p>The assessment did not review all land designated as Green Belt in the borough. It assessed:</p> <ul style="list-style-type: none"> - Sites examined during the previous UPD Review; - Submissions received in response to an initial UDP consultation in 2001 and submissions received since that time; - Sites identified in the Metropolitan Open Land and Green Chains Assessment 2005; and - Sites identified by officers which could benefit from Green Belt designation and sites in the Green Belt which do not meet the purposes of the Green Belt. <p>The assessment reviewed used PPG2 to identify indicators for Green Belt boundary alteration, deletion or inclusion using the purposes of Green Belt as outlined in PPG2 and the inclusion of specific guiding indicators for each purpose of PPG2.</p>
Spelthorne Borough Council	Spelthorne's Local Plan consists of Core Strategy and Policies DPD, Allocations DPD and Proposals Map each adopted in 2009, as well as Local Plan 2001 Saved Policies.	The 2009 Core Strategy and Policies indicate that development needs can be met without releasing land from the Green Belt.	None.	N/A

Authority	Local Plan Status	Green Belt Context	Green Belt Review	Methodology/Conclusions from Green Belt Review
London Borough of Richmond Upon Thames	Richmond's Core Strategy was adopted in 2009 and the Development Management Plan was adopted in 2011. The Site Allocations Plan pre-publication consultation finished in October 2014, adoption is anticipated in Autumn 2015.	The adopted Core Strategy (2009) states that as the Council can achieve its strategic dwelling target and other land use needs without the loss of protected open land. It is not envisaged that significant changes will be brought forward through the site allocations DPD, and there may be scope for including some additional areas for further protection.	None.	N/A
London Borough of Ealing	The Ealing Local Plan consists of the Development (Core Strategy) DPD (2012), Development Sites DPD (2013) and Development Management DPD (2013)	The primary function of Ealing's Green Belt is to check unrestricted sprawl. A review of the Green Belt is not indicated in the Local Plan.	Background Paper 3 – Green Space (2010)	High level review of Green Belt in Ealing which recommended minor boundary changes to reflect more recent built development and to rectify errors in mapping. The only significant change involved reclassifying one section of the Green Belt network (Greenford Lagoons/Birch Wood), resulting in a de-designation of 21.7 ha. This change was made because the area was considered to more appropriately reflect the characteristics of Metropolitan Open Land rather than Green Belt, and accordingly was re-designated as such. This position was upheld by the Inspector during examination of the Core Strategy.
London Borough of Hammersmith and Fulham	The Hammersmith and Fulham Local Development Framework comprises the Core Strategy (2011) and Development Management Local Plan (2013). Issues and Options Consultation was completed on the Local Plan Review in September 2013.	There is no Green Belt designated in the London Borough of Hammersmith and Fulham.	None.	N/A

2.7 Recent Green Belt Reviews in London

Although a number of Green Belt Reviews have been undertaken by London boroughs in recent years, few of these have involved thorough assessments of Green Belt land against its purposes, as set out in the NPPF (and, prior to that, PPG2), or set out detailed methodologies. Research undertaken by the Campaign to Protect Rural England (CPRE) in 2014 found that nine London Boroughs have reviewed Green Belt and Metropolitan Open Land boundaries in their areas, often as part of the Local Plan process. A summary of the five recent Green Belt Reviews, (excluding Hounslow's own Green Belt study and those which concentrated solely on Metropolitan Open Land), is provided below, adapted from the CPRE work.

Table 2.2: London Green Belt Reviews

Council	GreenBelt Area, ha (2011/2012)	Green Belt Review Date	Green Belt /MOL Boundary Changes
Ealing	330	2010	Re-categorised 20ha of Green Belt land as Metropolitan Open Land
Enfield	3060	2012	Circa two hectares removed from the Green Belt.
Havering	6010	2008	Sites removed from the Green Belt.
Hillingdon	4970	2006	Sites removed from Green Belt and sites added to Green Belt.
Redbridge	2060	2013	Five possible sites for release from the Green Belt

Source: CPRE (2014) London's Green Belt and Metropolitan Open Land

2.7.1 Methodological Approaches

As already highlighted, some recent Green Belt Reviews undertaken in London did not adopt the detailed 'purposes' approach, and instead look specifically at the strength/defensibility of boundary features to identify locations where revisions might be appropriate.

Other documents did use the purposes in their assessment but did not elaborate on what criteria were used to appraise sites, or methodologies were not available publicly. This was the case for Ealing and Havering. In the latter of these, Havering stated in their Core Strategy that '*sites have been assessed against the five purposes [of the Green Belt]... set out in PPG2 and whether exceptional circumstances exist to justify their removal*'. However, the detailed work undertaken as part of this process does not appear to be published. A similar approach was taken in Hillingdon, with the assessment focused on sites submitted to the authority for possible removal from the Green Belt. Again though, no detail is provided on how sites were appraised against the purposes.

The Green Belt Review undertaken in Redbridge provided a more detailed reflection on how the Green Belt purposes, including Purposes 2 and 3, should be interpreted in the local context³; the Broxbourne Green Belt Review provides a further example⁴.

2.7.1.1 Purpose 2

The Redbridge Green Belt Review noted that national policy on Green Belt, (PPG2 at the time the assessment was carried out), '[applied] *more easily to discrete settlements...rather than to areas within wider conurbations that contain patches of green belt land or are*

³ London Borough of Redbridge Green Belt Review – Stage 3: PPG2 Assessment, Colin Buchanan, 2010

⁴ Borough of Broxbourne Review of the Green Belt for the Preparation of the Local Development Framework (LDF): Final Report, Scott Wilson, 2008

partially bounded by larger green belt parcels'. While PPG2 has since been replaced by the NPPF, the purposes have been retained unchanged, and as such the wording remains less applicable to rural-urban fringe areas of the London Green Belt, as seen in Hounslow.

Specifically in relation to Purpose 2, 'To prevent neighbouring towns from merging into one another', Redbridge highlights the issue that different London suburbs centred around town centres, all contiguous and part of London, cannot truly be described as 'neighbouring towns'. In this case, a local interpretation is applied whereby Green Belt should prevent the merging and coalescence of local centres within the existing conurbation.

Another Green Belt Review, local to London, notably reinterpreted the text in Purpose 2 to take into account unique local context.

Broxbourne, a district of Hertfordshire directly adjacent to Greater London, states in its Green Belt Review that a number of unique settlements, although technically not towns, are at risk from coalescence and thus land parcels are deemed to meet Purpose 2 if they provide a crucial buffer between 'distinct existing settlements'.

2.7.1.2 Purpose 3

Across different Green Belt reviews there have been various approaches with regard to the interpretation of Purpose 3. There are two constituent parts which might be considered when assessing land against this Purpose; the extent to which 'encroachment' occurs; and the extent to which Green Belt might be considered 'countryside'. The former of these is more strongly linked to the issue of 'sprawl' (Purpose 1), given such development would almost certainly encroach on surrounding countryside. Focusing on this point, Green Belt reviews have often used methods to assess the openness of land (and thus the degree of 'encroachment' which has already occurred) and the presence of countryside characteristics. The Green Belt Review prepared for Dacorum, St Albans and Welwyn Hatfield is a strong example of such an approach, combining a quantitative assessment of openness (developed versus undeveloped land) and a qualitative assessment of countryside characteristics⁵.

The key issue for consideration in Hounslow is that much of the Green Belt is not 'countryside' in its purest sense, thus bringing into question the application of this Purpose in an urban context. Different local Green Belt reviews have tackled this issue in different ways. The Broxbourne Green Belt Review awarded points to areas based on the relative significance of in terms of different 'rural' characteristics, which included:

- International, national or local nature designations;
- Protected woodland or trees;
- Greenfield and brownfield land;
- Agricultural grade of land.

The Redbridge Green Belt Review is perhaps, contextually, most relevant. Noting the conflict between national policy of the time, which stipulated that Green Belt should be open and '*several miles wide*', and the local context which dictated a more urban fringe characteristic, the assessment adopted the term 'countryside in and around towns'. This terminology, developed by Natural England, referred to land at the urban fringe performing against a number of 'countryside functions'. The approach also considered linkage to the wider Green Belt network in designating scores for assessment areas.

⁵ Green Belt Review Purposes Assessment – Prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council: Final Report, 2013, Sinclair Knight Merz

2.8 Wider Experience

2.8.1 Appeals

Correspondence between the then Planning and Development Minister and the Planning Inspectorate in March 2014 reaffirmed the importance and permanence of the Green Belt, that Green Belt may only be altered in exceptional circumstances by local planning authorities through the preparation or review of their local plans, as well as that the Green Belt has a special role in framing the presumption in favour sustainable development. The 2014 challenge in The High Court in relation to the Solihull Local Plan also emphasises the need for a robust approach to be taken in terms of assessing Green Belt boundaries.

2.8.2 Other Green Belt Reviews

A brief examination of a selection of Green Belt Reviews carried out elsewhere the country, revealed the following key lessons in terms of methodology:

- A variety of approaches have been taken in assessing the functionality of Green Belt against the NPPF purposes. This partially reflects that each study has been undertaken in response to a specific brief and is tailored to the special local characteristics of the area in question.
- A two stage process has typically been used to firstly identify those Green belt areas least sensitive to change and where development would be least damaging in principle, before moving onto a second stage to consider technical site constraints.
- For the purposes of assessment, authorities have primarily divided the Green Belt into strategic land parcels for assessment using durable, significant and strong physical boundaries which are clearly defined in the methodology, though some have used grid squares of a defined size to identify the land parcels for assessment.
- Only those purposes deemed relevant to the local context have been used in reviews rather than necessarily using all five, while in some instances authorities have combined multiple purposes within their assessments.
- In terms of interpreting the national purposes, definition of terms, (both within the purposes themselves and criteria applied), is of key importance to a successful and transparent assessment.
- Assessment criteria used to assess individual purposes have been tailored to local circumstances; and in some instances authorities have added additional purposes to be assessed to reflect local priorities.
- Qualitative approaches are primarily used in assessments; although some authorities have used more quantitative measures. The approach to scoring in assessments varies from simplistic traffic light systems to more complex approaches to scoring.

2.9 Implications for Hounslow

National policy, as set out in the NPPF, emphasises the importance and permanence of Green Belt – this is reiterated in the London Plan. The NPPF sets out clearly the five purposes that the Green Belt is intended to serve, highlights that the Local Plan process offers the only opportunity for the Green Belt boundaries to be reviewed; and stresses that boundaries should be defined using permanent and recognisable physical features. Neither the NPPF, nor the supporting national PPG, provide guidance on how to conduct a Green Belt Review per se. In the spirit of localism, the implied emphasis is thus on each authority developing a methodology which is appropriate to the local context.

2.9.1 PAS Guidance

The PAS guidance on Green Belt Reviews issued in 2014 is particularly helpful in setting out key parameters to consider when developing a green belt review methodology. Key points of note for Hounslow arising from this guidance are that:

- a Green Belt Review is not an assessment of landscape quality;
- the label ‘historic towns’ applies to a select number of settlements and therefore Purpose 4 assessment will only be relevant in very few instances;
- Purpose 5 is not helpful in terms of assessing relative value of land parcels. This is particularly relevant in a highly urban context, such as Hounslow, where development is already focused on previously developed land; and

Green Belt is a strategic issue and should be considered collaboratively with neighbours under Duty to Cooperate.

- Considerations in relation to Purpose 3 will reasonably look at the difference between land under the influence of the urban area and open countryside

2.9.2 Wider Experience

Two of Hounslow’s neighbouring authorities have undertaken Green Belt Reviews; in the case of Hillingdon, the date (2006) and context (partial review of limited sites) means that it is of limited relevance in terms of helping to define a methodology for Hounslow, while the more recent Ealing review was high level and focused primarily on boundary amendments. Overall, research undertaken by the CPRE indicates that there is relatively little precedent to draw upon London wide in terms of appropriate methodologies and the interpretation of the NPPF purposes in a highly urban context.

As illustrated above, there is little precedent with regards to interpretation of Purpose 2 in a rural-urban fringe context. The context of Redbridge is certainly very similar to Hounslow – a series of long established centres which have gradually become suburbs of London and subsequently coalesced. Indeed, Redbridge adopt ‘local centres’ as their spatial areas for analysis in Purpose 2. If a similar approach were to be taken in Hounslow, an equivalent, plan based definition of different areas would be adopted. This might take the form of a tier in the hierarchy of centres, as set out in the Local Plan, or Local Character Areas (as developed for the Hounslow Local Plan evidence base). The key weakness in this approach is that, to different extents, all of Hounslow’s character areas are coalesced into the London conurbation, and thus there is a question over whether the Green Belt could serve Purpose 2 in this location. Furthermore, whilst Hounslow’s diverse range of neighbourhoods retain a uniqueness and individuality, the Green Belt is only one of many elements that contribute to this. Ultimately, whilst Hounslow’s Green Belt has prevented complete coalescence between historically distinct settlements, it is questionable whether such a restrictive designation is necessarily the most appropriate way of achieving this today.

With regards to Purpose 3, as highlighted above, it is crucial that considerations reasonably look at the difference between land under the influence of the urban area and open countryside. In order to achieve this, the Broxbourne approach provides a way of distinguishing between different land parcels but there is a risk that awarding points on such a wide variety of discrete criteria may prove arbitrary. Furthermore, certain characteristics assessed (for example, nature designations or grade of agricultural land) do not reflect countryside characteristics and appear to be more aligned with the quality of land, (which is not a consideration when designating Green Belt), or technical constraints (not assessed in Stage 1 of the Green Belt Review).

The Redbridge Green Belt Review provides a more useful interpretation, particularly given the similarities between Redbridge and Hounslow as outer London, rural-urban fringe boroughs. The assessment considers the extent to which Green Belt is ‘countryside’ in terms

of the functionality of land, an approach consistent with that used in Dacorum, St Albans City and Welwyn Hatfield. Given the highly urban context in Hounslow, the ‘Countryside in and around Towns’ criterion developed by Natural England is of particular relevance here, while the question of connectivity into wider Green Belt or open space is also pertinent.

The following table (Table 2.3) summarises the different elements which may contribute to the character of a land parcel with regard to Purpose 3, compiled from previous Green Belt Reviews as well as ideas submitted by the London Borough of Hounslow and neighbouring authorities. While all might be considered relevant to a Green Belt Review, those indicated in the table were deemed particularly to the Purpose 3 assessment in Hounslow.

Table 2.3: Elements of Purpose 3 Qualitative Assessments

Characteristic	Relevance to Assessment	Considered?
Openness	Strong component of countryside - quantified component of scoring based both on percentage built form versus open land.	✓
Land use (woodland, reservoirs, agriculture etc.)	Crucial to a functional definition of countryside, given certain land uses might naturally evoke a greater sense of urbanity or rurality.	✓
Shape	Shape may impede or enhance the sense of openness in a land parcel and is also linked to function.	✓
Scale	Scale influences visual as well as functional characteristics and may contribute to a sense of tranquillity or a sense of remoteness from the urban area.	✓
Surrounding context	Highly relevant to countryside character (though may have a greater impact on smaller parcels).	✓
Presence of urban infrastructure (London Underground stations etc.)	Not deemed relevant to the NPPF assessment but intrinsically linked to considerations of land use change, thus would be a consideration in Stage 2.	✗
Designations (protected woodland, environmental etc.)	Environmental designations might be associated with characteristics that provide a sense of rurality, though this would be picked up more generally in a qualitative assessment of character regardless of the status of the land. Would be considered in Stage 2.	✗
Management (of Open Space)	Directly linked to land use; urban managed parks may diminish a land parcel’s sense of rurality.	✓
Linkage to other open land (including Green Belt)	Parcels are likely to have a stronger rural character if linked to the wider countryside or other open areas, particularly if they have the protection of a Green Belt designation.	✓
Ecological value	Though ecological value is clearly found on open land, more particular characteristics are not taken into account in the present assessment. Commentary provided on a site-by-site basis provides additional information for use in Stage 2.	(✓)
Greenfield/ brownfield	Taken into account in the assessment – brownfield may be open but might also diminish sense of rurality, highlighting the value of both qualitative and quantitative assessments.	✓

Location	Linked to comments on linkage to other open land and surrounding context.	✓
Visual experience	Linked to scale, shape, surrounding context and linkage; on the ground, does looking out over the parcel create a visual sense of rurality?	✓
Auditory experience	Sense of tranquillity may create a greater sense that a land parcel is countryside.	✓
Paved surface (e.g. runway, car park)	Taken into account in quantitative assessment, with paved surfaces included as Built Form	✓
Public access	This was not deemed relevant to this aspect of the assessment, but may be a consideration in Stage 2 when considering future land use.	✗
Topography and landform	May be relevant in some cases where topography has an impact on perception of rurality.	✓

One overarching point stands out; a review of experience elsewhere indicates that the primary consideration in developing a Green Belt methodology is to take account of local circumstances in considering which purposes to apply. Furthermore, the criteria used to assess them should ensure that key terms are well defined and develop measurable and robust assessment criteria.

3 Hounslow Green Belt Context

3.1 History of Hounslow Green Belt

Green Belt policy has been one of the most notable achievements of the planning system. During the post-war period, the urban area of London doubled in size. During the early part of the 20th century, Hounslow underwent rapid urban expansion and housing expanded over agricultural land. The extension of the District Railway to Hounslow Barracks, along with the introduction of electric trams, connected the town directly to central London and triggered a boom in semi-detached housing and estate development around railway stations. Later, the Great West Road became a major arterial route and generated significant ribbon development.

Throughout London, concerns grew about the impact of sprawl, and the modern Green Belt, first defined by Patrick Abercrombie in the Greater London Plan of 1944 and established in the Town and Country Planning Act of 1947, subsequently curtailed the further unchecked growth of London's urban area.

Circular 42/55, released by government in 1955, set out three main functions of the Green Belt: to check the growth of a large built-up area; to prevent neighbouring settlements from merging into one another; and to preserve the special character of a town.

Hounslow's Green Belt was first defined in 1956 upon the adoption of the Middlesex County Plan, which reflected the Greater London Plan as drawn up by Abercrombie. On the abolition of the County of Middlesex in 1965, these boundaries were adopted by the newly formed London Borough of Hounslow.

The Green Belt has undergone review on a number of occasions since its inception. In 1986, a comprehensive review was undertaken to *'facilitate improved Green Belt function and appearance, establish a rational defensive boundary and accommodate certain urban needs'*⁶. The proposed changes were confirmed on adoption of the West Area Local Plan in 1989 (Map 3.1). The changes were as follows:

- 196 ha of potential Green Belt extensions were identified, comprising of 25 sites contiguous with the existing Green Belt, predominantly open spaces, and not considered suitable for urban development. It was felt that the inclusion of these sites would strengthen the Green Belt as a whole.
- Concurrently, 23 sites were identified for removal from the Green Belt: six sites developed for housing from 1967 onwards and approved as development within the Green Belt; one further site which would be released for housing; 15 sites developed for commercial uses from 1965 onwards, some of which were allowed on appeal where it was felt that airport or national interest outweighed that of the Green Belt; and one additional site with existing housing development, where Green Belt designation was no longer relevant after the withdrawal of a highways proposal.

⁶ Draft West Area Local Plan, LBH, 1986

Map 3.1 – Green Belt Proposals, Draft West Area Local Plan 1986



Green Belt Changes

A3 Extensions to the Green Belt

Deletions from the Green Belt

- B6** B. Where development has occurred or is permitted
- C4** C. To achieve the aims of Environment Policy 17

West Area Local Plan
Draft Plan

Hounslow
London Borough of Hounslow

Scale : 1:25000 Metres 600
 Grid North :
 Date : Spring 1986
 Ref. No. : P WALP DP 3

Planning Department
 R.E. Reynolds BSc, ARICS MRTPI
 Borough Planning Officer

A further review was undertaken for the Draft UDP. Published by the authority in 1991, the document highlighted the important role of the Green Belt in '*separating Hounslow from adjacent settlements and...providing land for recreation for people living in the built up area*' and emphasised the need to look at the Green Belt in a comprehensive way, clearly justifying any proposed changes⁷. A small number of further amendments were proposed (Map 3.2)⁸, the most notable of which were:

- The deletion of a 7.5 ha site to the west of Feltham Hill School where permission was allowed on appeal for housing;
- The designation of a 10.5 ha site at Feltham Marshalling Yards as Green Belt in recognition of its Site of Metropolitan Importance status; and
- The deletion of a 6 ha site at Dukes Green which had been consented for a Tesco in 1989.

A proposal to remove 1.5 ha of land from the Green Belt to the south-west of Western International Market was not accepted in the recommendations set out in the examination of the UDP in 1994; it was deemed that the site was an '*integral part of the Crane and M4 Corridors*' and should be retained, in line with the review carried out in 1986 for the West Area Local Plan, though it is important to note that the decision was taken in a differing national policy context⁹. The UDP was adopted in 1996.

Aside from two small transfers of Green Belt to the London Borough of Hillingdon as a result of boundary amendments in 1993^{10 11}, there have been no further changes to the 1996 adopted Green Belt boundaries. The boundaries were carried through unchanged to the most recently adopted UDP in 2003.

An audit of boundaries was carried out in 2012 as part of the preparation for the emerging Local Plan. This has proposed further revisions, which are discussed in section 3.3

⁷ Draft UDP, LBH, 1991

⁸ Hounslow UDP Schedule – Green Belt Changes, LBH, 1996

⁹ Hounslow UDP – Inspector's Report, 1994

¹⁰ The Ealing, Hillingdon and Hounslow (London Borough Boundaries) Order, 1993

¹¹ The Heathrow Airport (County and London Borough Boundaries) Order, 1993

Map 3.2 – Green Belt Additions and Deletions, Draft UDP 1991



3.2 Green Belt Management Plans

LBH produced Green Belt Management Plans in 1992 and 1999 which complemented the UDP. The purpose of the management plans was to provide a basis for proposals to maintain and enhance Hounslow's Green Belt, acknowledging that not all of the Green Belt was high quality and that there was scope for improvement. The 1992 management plan included site surveys and background research of eight major study areas which reflected the Comprehensive Project Areas identified in the UDP. The survey was used to form the basis of short and long term local priorities and proposals with the objective to:

- *'Increase public use – to facilitate the use of the Green Belt as a recreational and ecological resource through appropriate Green Belt uses/development and management.*
- *Increase public access – to develop formal and informal links to and through the Green Belt by developing a network of footpaths, bridleways and cycle routes.*
- *Improve the landscape – through appropriate landscaping and subsequent management of areas in the Green Belt and its boundaries.*
- *Remove inappropriate/unauthorised uses – the restoration of sites to appropriate Green Belt use*
- *Make sites safe – to address the problems of landfill sites and general public safety.'*

The 1999 Management Plan examined the progress made since 1992 and formed supplementary planning guidance to the UDP review and set future objectives and proposals to enhance and manage each of the six Comprehensive Project Areas, which formed part of the adopted 2003 UDP:

- Bedfont;
- Kempton;
- Hounslow Heath;
- River Crane Valley;
- Hanworth Park; and
- Cranford.

3.3 Green Belt Boundary Audit, 2012

In 2012, a Green Belt boundary audit was undertaken in-house by the London Borough of Hounslow Planning Policy Team. Its purpose was to ensure that existing Green Belt boundaries were defensible and could be easily identified. It was decided not to take the findings of this assessment forward but instead to conduct the wider review undertaken through this report.

The assessment examined existing Green Belt boundaries and new land was only proposed for inclusion where it was felt this would provide a more defensible Green Belt boundary. Hounslow's Green Belt was mapped and an area level assessment was undertaken to consider overall performance of the Green Belt against the five purposes before a boundary assessment was undertaken for tabulated sites to

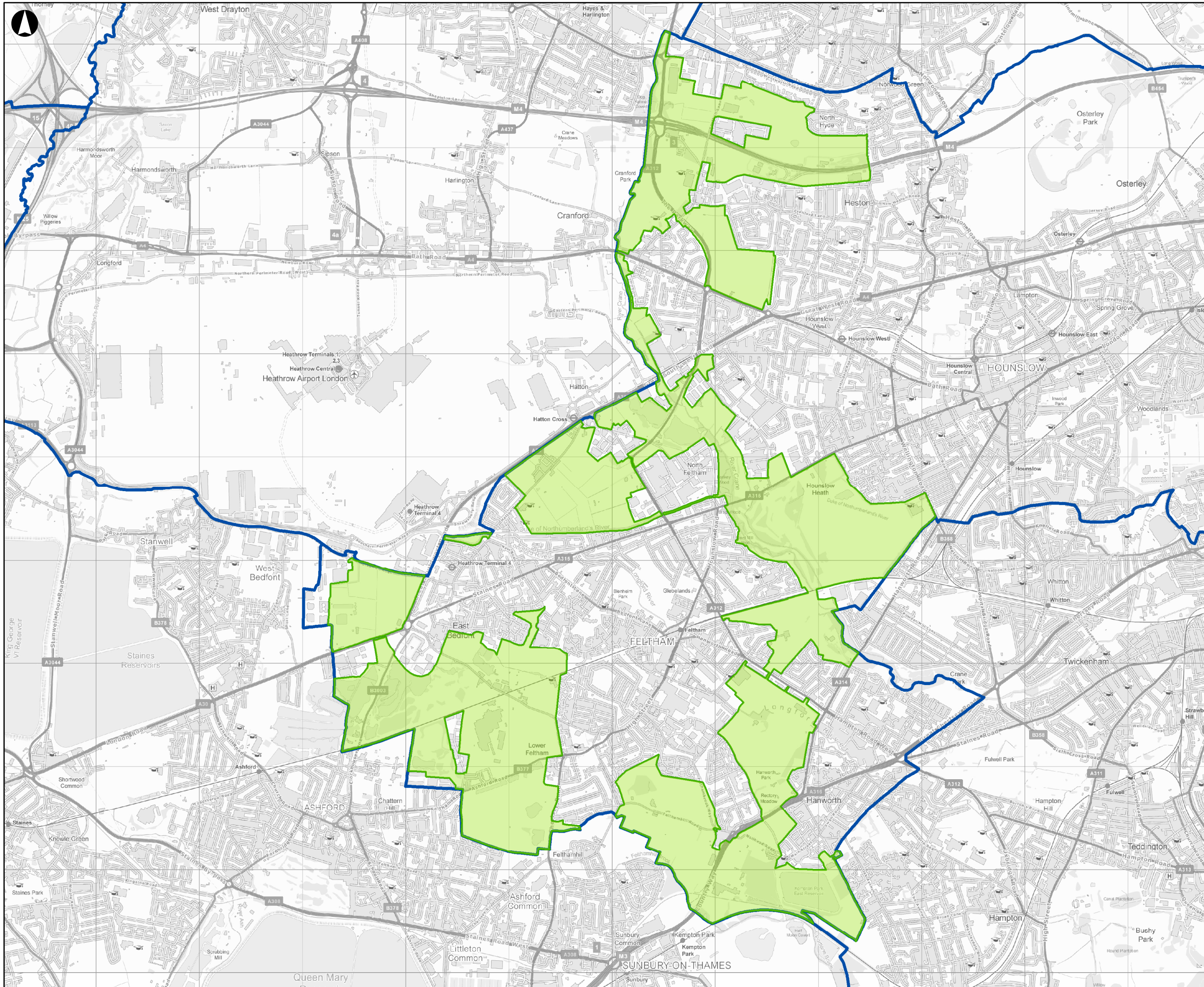
establish any required amendments based on local knowledge, aerial photography, Google street map and site visits.

The review analysed the boundaries of 86 sites of which 28 were considered for alteration and of which 18 were recommended to have a boundary change. The majority of the amendments were required due to developments encroaching on the Green Belt or through changes in the landscape (such as new hedgerows) to ensure a consistent approach is taken and were relatively minor in nature, however two boundary changes over one hectare were also recommended:

- Western International Market; and
- Land east of Westgate Estate, Ascot Road.

The review states that *'the quality of the land has been considered and therefore the newer proposed boundaries would present stronger and higher quality land whilst satisfying purposes of the Green Belt instead of demonstrating weak and perhaps indefensible boundaries'*.

The proposed boundary changes were not implemented, but the document has informed the approach to this Green Belt Review as set out in Section 4.2. Hounslow's Green Belt is shown in Map 3.3.

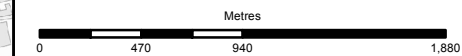


Legend

- Hounslow Green Belt
- Borough Boundary

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P1	07-01-15	HC	ML	KF
Issue	Date	By	Chkd	Appd



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Job Title
Hounslow Green Belt Review

Map 3.3 Hounslow Green Belt

Scale at A3
1:35,000

Job No 240050-00	Drawing Status ISSUE
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Drawing No 3.3	Issue P1
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4 Methodology

4.1 Introduction

The following section sets out the methodology used to undertake the Green Belt Review in Hounslow. The review was undertaken in two stages:

- Stage 1A assessed strategic land parcels, ‘General Areas’, against the purposes of the Green Belt as defined in the NPPF. This assessment identified the relative performance of the General Areas against the NPPF defined purposes of the Green Belt;
- Stage 1B initially appraised the Green Belt in terms of landscape. The very weakest performing General Areas were recommended for further assessment in Stage 2 at this point.
- Remaining General Areas were then considered in further detail, looking specifically at internal boundary features to identify small-scale sub areas within General Areas. This was followed by re-appraisal against the NPPF purposes and, combined with the outputs from the previous assessments, a series of additional areas were identified for further assessment in Stage 2.

Stage 2, to be undertaken by the London Borough of Hounslow, will canvass the potential alternative uses of the areas identified through Stage 1 as not meeting or performing weakly against the Green Belt purposes.

Stage 1A: Desktop Review

4.2 Identify General Areas

The scope for this review was to consider all Green Belt land, as defined in the saved policies in the 2003 adopted Unitary Development Plan, as well as land outside of the defined urban areas but not within the Green Belt. The starting point for assessing land against the NPPF purposes was to identify strategic land parcels ‘General Areas’ for appraisal.

Green Belt

Some 1,219 hectares of land in the borough is designated Green Belt¹², all of which was included in the review. Any potential alterations to the Green Belt must be based on a new permanent and defensible boundary; thus permanent man-made and natural features were selected as the basis for the identification of the General Areas. In particular, the boundaries of the General Areas were based on the following features (Map 4.1):

- M4 Motorway
- A and B Roads
- Railway lines
- River Crane

¹² Green Belt Management Plan, LBH, 1999

A total of 25 General Areas were identified on this basis, each of which is identified by a number from 1-25 (Map 4.2).

The General Areas were reviewed and agreed with Council officers as covering the full extent of the Green Belt within Hounslow.

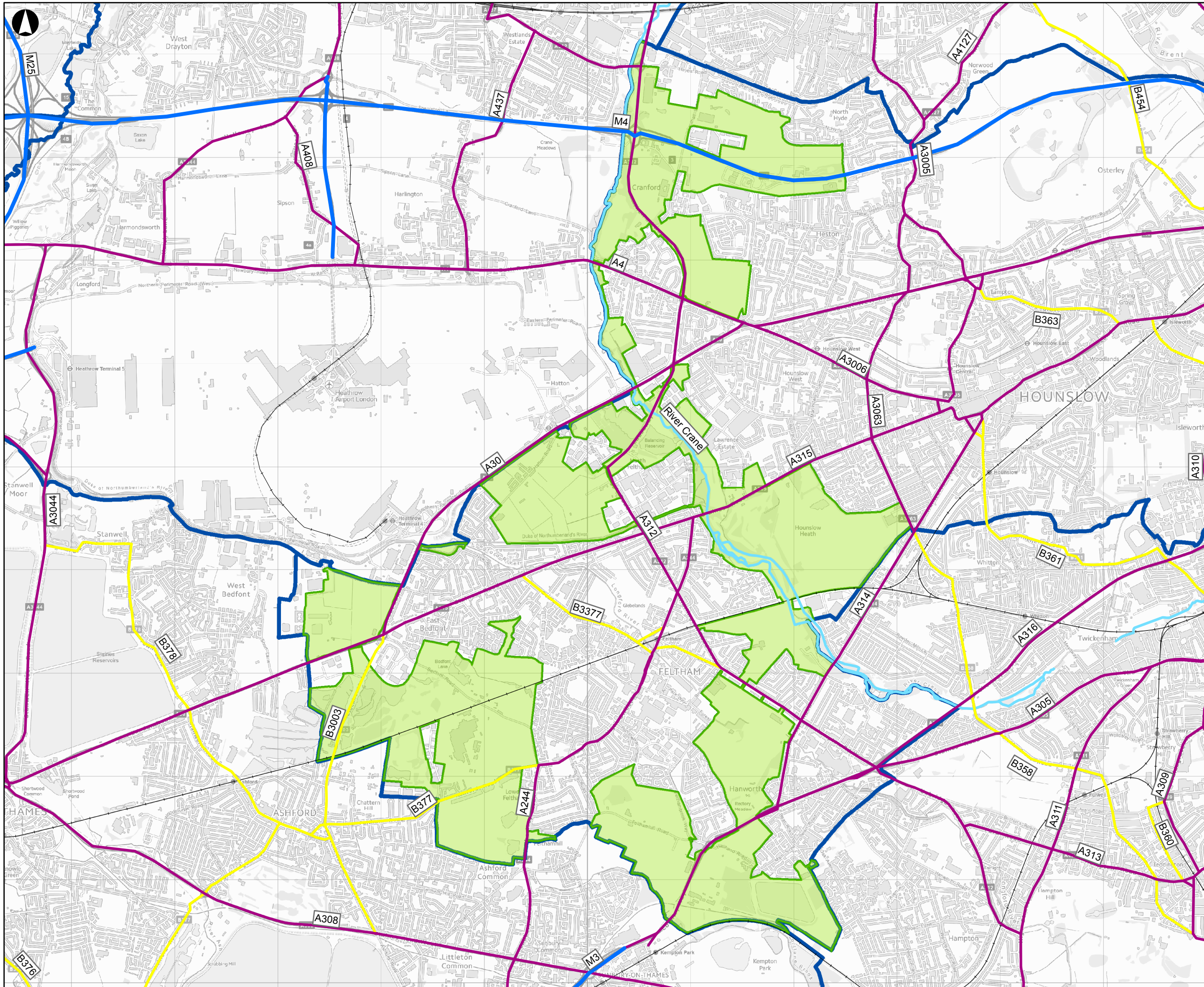
Non Green Belt

In addition to Green Belt land, the review also considered land not currently covered by a Green Belt designation. In practice, this equated to the areas considered for inclusion within the Green Belt as part of the 2012 Green Belt Boundary Audit. While the assessment undertaken in the 2012 Review was weighted towards the clarity and permanence of boundaries, the remit for this study is more firmly focused on establishing whether General Areas meet, or have the potential to meet, the purposes as set out in the NPPF, and how strongly they are met. The sites proposed for inclusion within the Green Belt in the previous review were examined as potential areas to include in this study. In practice, most of these areas related to minor boundary revisions and were therefore excluded as potential General Areas. For the purpose of this study, only areas which were one hectare or more were taken forward to be assessed¹³. Each of these General Areas is identified by a letter from A-C (Map 4.2).

Table 4.1: Non Green Belt Areas Considered for Assessment

Site Ref (2012 Green Belt Review)	Site Name	One hectare or more?	General Area
38	West of Godfrey Way	×	×
47	Staines Road	×	×
48 (west)	Land South of Staines Road between Ascot Road state and Clockhouse Roundabout	✓	A
48 (east)		✓	B
52	Fairholme Junior, Infant and Nursery School	×	×
54	Open space to the west of Padstow Walk	✓	C

¹³ Classified as ‘large changes’ in the 2012 Green Belt Review



Legend

- Motorway
- A Road
- B Road
- River Crane
- Railway Line
- Green Belt Boundary
- Borough Boundary

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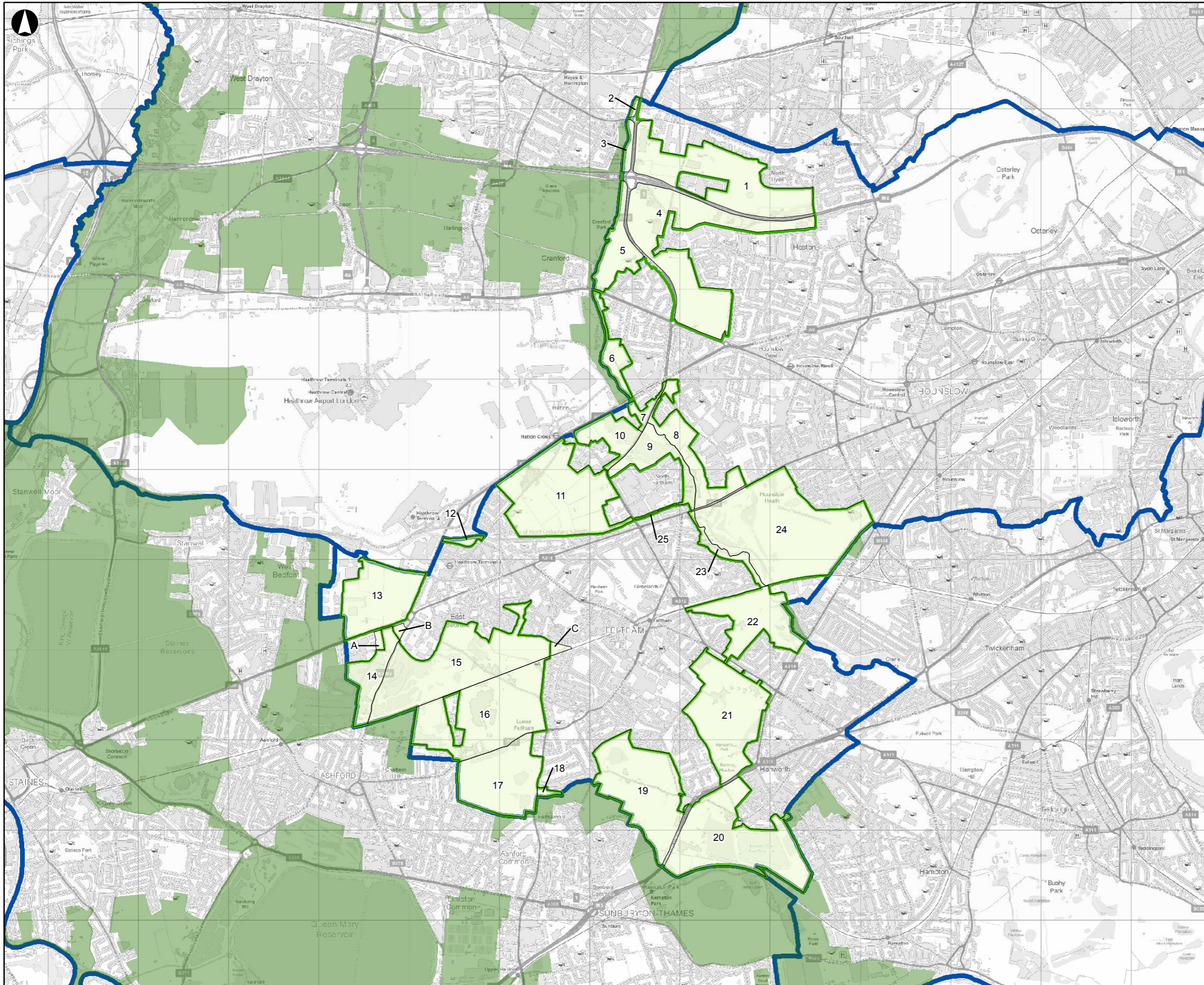
Client
Hounslow Borough Council

Job Title
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**Map 4.1 Defining Features
for General Areas**

Scale at A3
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Job No 240050-00	Drawing Status ISSUE
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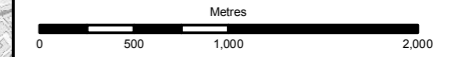
- General Area Boundary
- Green Belt Boundary
- Borough Boundary

1-25 Green Belt land parcels
A-C Non Green Belt land parcels

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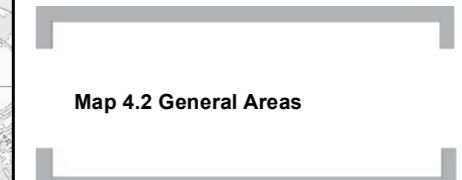


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4.3 Assess General Areas

Each of the General Areas was assessed against the NPPF purposes for Green Belt. In the spirit of Localism, there is no national guidance which establishes exactly how such an assessment should be undertaken. The PAS guidance, recent examples and previous experience reiterates the need to respect local circumstances and the unique characteristics that affect the way that the NPPF purposes of the Green Belt are appraised.

The purpose of the assessment was to establish any differentiation in terms of how the General Areas in the existing Green Belt function and fulfil the purposes of the Green Belt at a strategic level. For those General Areas outside of the current Green Belt the assessment considered how these strategic land parcels might fulfil the purpose if designated.

For each purpose, one or more criteria were developed using both qualitative and quantitative measures. A score out of five was attributed for each criterion (Figure 4.1), where 1 equals least fulfils criterion and 5 equals most fulfils criterion. If a General Area was considered to have no contribution to a specific purpose, a statement was added to the pro forma to this effect and no score was attributed. It is important to note that each of the NPPF purposes is considered equally significant, thus no weighting or aggregation of scores across the purposes was undertaken.

Figure 4.1: Criterion Scores

Overall Strength of General Area against criterion	Score	Equivalent Wording
	1	Weak or Very Weak
	2	Relatively Weak
	3	Moderate
	4	Relatively Strong
	5	Strong or Very Strong

The following sub-sections examine the definition of each of the five purposes of the Green Belt in relation to local objectives and role of the Green Belt in terms of achieving its purpose locally; and set out the criteria and associated scoring applied. The criteria and scores were discussed and refined in collaboration with Council officers, as well as officers from neighbouring and partnering authorities following a workshop session on 3rd December 2014¹⁴.

4.4 Purposes 1 and 2 Assessment

Purpose 1: To check unrestricted sprawl of large built-up areas.

Purpose 2: To prevent neighbouring towns merging into one another.

Building on precedent from previous Green Belt Reviews, it is evident that, in certain circumstances, it may be appropriate to consider purposes together in light

¹⁴ The following councils attended the workshop on 3rd December 2014: London Borough of Ealing; Runnymede District Council; Spelthorne District Council; London Borough of Barnet; and London Borough of Hillingdon.

of local context. In Hounslow, the issues of sprawl and coalescence are closely inter-linked. Therefore, when considered in the context of the wider Metropolitan Green Belt, all of the gaps maintained between settlements are extremely narrow. Thus, any development which would constitute ‘sprawl’ would equally generate an increased risk of coalescence between settlements. As a result, our approach considers that Purposes 1 and 2 are fundamentally linked by the same prerequisite; that a General Area must be at the edge of a distinct urban area (Table 4.2, Map 4.3) to fulfil these Purposes. If a General Area is contiguous with built-form that constitutes only one built-up area, then it can be considered neither preventing sprawl nor coalescence.

The following sections set out some specific context for the Purpose 1 and Purpose 2 elements of the assessment, followed by detail on how the assessment was conducted in practice.

4.4.1 Purpose 1

For the Purpose 1 element of the assessment, the strength of the existing Green Belt boundary was appraised to determine the extent to which it is able to restrict sprawl of large built-up areas, i.e. the spread of built form over a large area in an untidy or irregular way. The original purpose of the Green Belt was to stop the unchecked growth of the London built-up area. The Green Belt in Hounslow, although relatively fragmented, has played an important role in preventing the encroachment of London into Surrey. Hounslow is one of several boroughs at the extreme west of Greater London; further to the west is the Borough of Spelthorne, Surrey. This purpose assessed the role of General Areas in restricting the sprawl of the large built up area of London, with a particular focus on those areas between Greater London and Surrey.

Within Hounslow and in the surrounding London boroughs, we interpreted the “large built up area” referred to in the NPPF as the Greater London continuous built up area. This includes all non-Green Belt areas within Hounslow and, for the most part, in Hillingdon, Ealing and Richmond-upon-Thames.

We adopted two particular exceptions to this approach: firstly, Heathrow Airport, as a unique development with a significant footprint and a functionally significant feature of London, was included within the assessment as part of the Greater London built up area; secondly, the settlement of Harlington, which lies in Hillingdon to the north-west of our study area, maintains a degree of separation from the built up area of Greater London and, as such, was treated as a discreet built up area for the purposes of this assessment.

Beyond Greater London, we considered separately unique settlements as follows:

- Ashford (Spelthorne)¹⁵
- Stanwell (Spelthorne)¹³
- Sunbury (Spelthorne)¹³

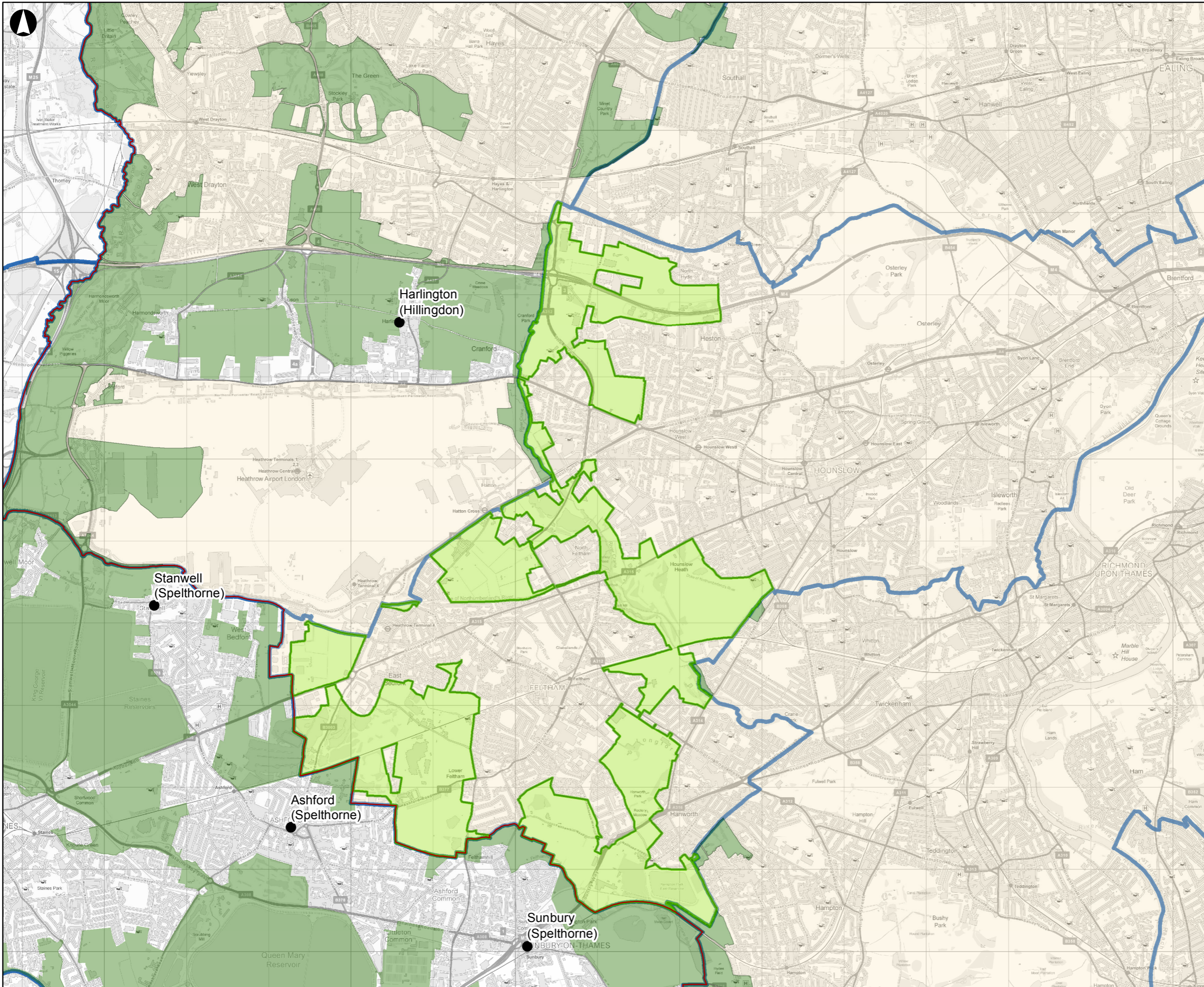
¹⁵ Ashford and Sunbury are identified as Local Centres and Stanwell as a smaller centre in the Spelthorne Core Strategy (2009) and lie adjacent to Hounslow.

The built-up areas are illustrated in Map 4.3¹⁶.

4.4.2 Purpose 2

This purpose forms the basis for maintaining the existing settlement pattern. Historically, the Borough of Hounslow consisted of a patchwork of rural villages and towns, but the area underwent rapid urban expansion in the early part of the 20th century and housing expanded over agricultural land, causing previously separate settlements to coalesce. While a series of different character areas (based around Hounslow's historic settlements) remain, retaining their own unique distinctiveness and character, we have not deemed the Green Belt the primary determinant of this. These Areas could not realistically be described as neighbouring towns (as stated in NPPF Purpose 2) and, as such, we treated non-Green Belt areas within Hounslow and adjacent London Boroughs as one continuous 'town' (in line with the approach in Purpose 1); this excepted, as noted in 4.4.1, the settlement of Harlington. Settlements within non-London authorities adjacent to Hounslow's administrative boundaries were considered separately, identified from relevant local planning policy and confirmed with planning officers at a workshop on 3rd December 2014. In practice, this meant that the settlements considered in Purpose 2 were the same as the built-up areas identified in Purpose 1 (Table 4.2, Map 4.3).

¹⁶ Large built up areas were defined settlements identified in the respective Local Plans for each neighbouring authority and were confirmed initially with officers from the respective authorities at a workshop held on 3rd December 2014 or via by email subsequently with authorities that were unable to attend the workshop.

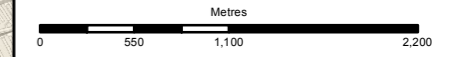


- Legend**
- Hounslow Green Belt
 - Borough Boundary
 - Greater London Built-Up Area
 - Greater London Boundary

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Job Title
Hounslow Green Belt Review

**Map 4.3 Purposes 1 & 2 -
 Settlements Considered in
 Assessment**

Scale at A3
1:44,000

Job No 240050-00	Drawing Status ISSUE
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Drawing No 4.3	Issue P1
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4.4.3 Purpose 1 & 2 Assessment

There were three elements to this assessment, as to whether the Green Belt is preventing unconstrained sprawl. The first, 1(a), was a straightforward ‘pass’ or ‘fail’ criteria related to whether the Green Belt is protecting open land at the edge of discrete large built up areas; and the second, 1(b), related to whether the Green Belt is preventing the sprawl of a large built-up area by creating a barrier in the absence of a permanent physical boundary.

Assessment (a)

Green Belt adjacent to large built-up areas should function to protect open land that is contiguous or connected to the urban area. Given the particularly fragmented characteristic of the Green Belt in Hounslow, with the vast majority of Green Belt enveloped by development, we have chosen to apply a simple pass/fail criterion for this part of the assessment to determine initially the potential for General Areas to meet Purpose 1.

Assessment (b)

The function of the existing Green Belt area in preventing sprawl, which would not otherwise be restricted by a barrier, was considered in two different spheres:

- The presence of durable physical boundary features along the edge of the built-form; and
- The extent to which the built-form edge could be described as strongly established or regular.

The NPPF states that Local Authorities should *‘define boundaries clearly, using physical features that are readily recognisable and likely to be permanent’* (Paragraph 85). Boundary identification reflected this, based on the following definitions:

- Durable features (likely to be permanent), including:
 - Infrastructure: motorway; public and made road; a railway line; river.
 - Landform: stream, canal or other watercourse; prominent physical feature (e.g. ridgeline); protected woodland/hedge; existing development with strongly established, regular or consistent boundaries.
- Features lacking in durability (soft boundaries):
 - Infrastructure: private/ unmade road; power line.
 - Natural: field boundary, tree line.

Where sprawl would not otherwise have been restricted by a durable boundary feature, the extent to which the existing built form had strongly established or recognisable boundaries was assessed, based on the following definitions:

- ‘Strongly established’, ‘regular’ or ‘consistent’ built form comprised well-defined or rectilinear built form edges, which would restrict development in the Green Belt.
- ‘Irregular’, ‘inconsistent’ or ‘intermediate’ built form comprised imprecise or ‘softer’ edges, which would not restrict growth within the Green Belt.

Assessment (c)

The extent to which an area of Green Belt protects a valued gap in the built-form was assessed as follows:

- Essential gaps, where development would significantly reduce the perceived or actual distance between settlements;
- Gaps, where limited development may be possible without coalescence between settlements;
- Less essential gap, where development is likely to be possible without any risk of coalescence between settlements.

Purpose 1 & 2 Assessment Criteria

The criteria used to assess the General Areas against Purpose 1 are set out below (Table 4.3). Ordnance Survey base maps and aerial photography were reviewed in order to undertake each of these assessments, the results of which were verified on site visits.

Table 4.3: Purpose 1 & 2 Assessment Criteria

Purpose	Criteria	Scores
To check the unrestricted sprawl of large built-up areas	(a) General Area is located at the edge of a discrete built up area.	PASS / FAIL
To prevent neighbouring towns from merging	(b) Serves as a barrier at the edge of a discrete built up area in the absence of another durable boundary.	<p>5: Provides a barrier for a large built-up area, which is weakly bordered by features lacking in durability or permanence. The large built up area may have one or two boundary features but these may be intermittent or irregular.</p> <p>3: Provides a barrier for a large built up area, which has two or more fairly prominent boundary features; and which contains at least one boundary, which is weak or lacking in permanence.</p> <p>1: Provides an additional barrier for a large built up area, which is bordered by prominent, permanent and consistent boundary features.</p> <p>0: Area is not contiguous with or connected to a large built-up area</p>

<p>Restricts development that would result in merging of or significant erosion of the gap between neighbouring settlements, based on a judgement of scale of the General Area or the General Area in combination with adjoining Green Belt parcels.</p>	<p>5: An essential gap, where development would significantly visually or physically reduce the perceived or actual distance between settlements.</p> <p>3: A largely essential gap, where there may be scope for some development, but where the overall openness and the scale of the gap is important to restrict settlements from merging.</p> <p>1: Less essential gap, or a small part of a much wider gap, which is of sufficient scale and character that development is unlikely to cause merging between settlements.</p> <p>0: Area does protect a gap between neighbouring settlements.</p>
<p>Total score</p>	<p>xx/10</p>

4.5 Purpose 3 Assessment

Purpose 3: To assist in safeguarding the countryside from encroachment.

For the purposes of this assessment, on the basis that much of the Green Belt within Hounslow could not be described as ‘countryside’ in its purest sense, the assessment considered, quantitatively, the openness of Green Belt land and examined, qualitatively, its sense of rural or countryside character¹⁷. Openness refers to the extent to which Green Belt land could be considered open with an absence of built development (rather than from a landscape character perspective). The characteristics of countryside character that were assessed qualitatively are discussed in Table 2.3.

Historic open land uses associated with the urban fringe as well as the countryside exist in the Hounslow Green Belt. The area is diverse in character and includes a number of developed sites such as housing, industrial uses, schools and the HMP Feltham Young Offenders Institute. Other uses include mineral working, motorways and their intersections, and agriculture. These urban fringe uses impact on both the openness of the Green Belt as well as its sense of rurality.

Purpose 3 Assessment Criterion

The criterion used to assess the General Areas against Purpose 3 is set out below (Table 4.2). In order to undertake the assessment, Ordnance Survey base maps and aerial photography were reviewed, with the findings verified through site visits.

The score attributed to a General Area was initially determined on the basis of the percentage built form. The percentage was calculated using GIS tools based on Arup’s own assessment of additional built form outside of the urban areas. The additional areas of built form were defined as buildings, surfaced areas such as car parks and infrastructure such as sewerage treatment works, which were identified through a desktop review.

Scores were considered further in light of qualitative assessments of character, undertaken through site visits and revised as judged appropriate¹⁸. This assessment considered, in particular, the relative ‘countryside’ value of General Areas (consistent with the NPPF). As highlighted previously, judging whether or not land has ‘countryside’ value can be challenging, particularly in a rural-urban fringe context such as Hounslow. Different Green Belt reviews have attached value to different characteristics and features; ultimately, our judgement primarily concentrated on functional and morphological characteristics of General Areas.

In order to differentiate between different General Areas on a qualitative basis, we considered:

- Land use;

¹⁷ For the purposes of this assessment, the terms ‘rural’ and ‘countryside’ are used interchangeably.

¹⁸ For example, General Areas with a relatively low level of built form (i.e. between 20-30%) and a largely rural character would score 3; however a General Area with a relatively low level of built form (i.e. between 20-30%) but with an urban character (such as formal open space designation covering the entire General Area) would score 1.

- Shape;
- Scale;
- Context;
- Land management (specifically, the presence of urban managed parks);
- Linkage to the wider Green Belt or countryside;
- Visual experience;
- Auditory experience;
- Topography and landform.

Different functional categorisations were used to provide an overall characterisation of each General Area, as follows:-

- *Strong unspoilt rural character*: land characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.
- *Largely rural character*: land with a general absence of built development, predominantly characterised by rural land uses and landscapes with other dispersed developments and man-made structures; General Area would be of sufficient scale so as to diminish the sense of urbanity and reduce the sense of ‘encroachment’ from the surrounding context, and maintain linkage to the wider network of countryside or green spaces.
- *Countryside in and around Towns (CIAT)*: land with a mixture of urban and rural land uses, which might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial); in general, land would be set in a tightly constrained urban context, impacted visually by surrounding development and with its openness and expansiveness interrupted by piecemeal development.
- *Urban character* was land dominated by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

Table 4.2: Purpose 3 Assessment Criterion

Purpose	Criterion	Score
Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.	5: Contains less than 5% built form and possesses a strong unspoilt rural character. 4: Contains less than 10% built form and/or possesses a strong unspoilt rural character. 3: Contains between 10% and 20% built form and/or possesses a largely rural open character. 2: Contains between 20% and 30% built form and/or possesses the characteristics of Countryside in and around Towns (CIAT).

	1: Contains less than 30% built form and/or possesses an urban character. 0: Contains more than 30% built form and possesses an urban character.
Total score	xx/5

4.6 Purpose 4 Assessment

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

This purpose serves to protect the setting of historic settlements by retaining the surrounding open land or by retaining the landscape context for historic features. As outlined in the advice note published by PAS, in reality, the assessment of this purpose relates to very few settlements in practice, due largely to the pattern of modern development that often envelopes historic towns today. Examples include Cambridge, Oxford, Windsor, Bath or Stratford upon Avon, which have clear historical status across a wide area rather than individual historic assets or conservation areas which are afforded protection through other legislative measures.

On the basis that no settlements within Hounslow meet this definition of a historic town, purpose 4 was excluded from the assessment.

4.7 Purpose 5 Assessment

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

Purpose 5 focuses on assisting urban regeneration through the recycling of derelict and other urban land. The guidance issued by PAS suggests that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. Given all new development in Hounslow is taking place on previously developed land, and non-Green Belt land has been taken into account in the development of the SHLAA, the assessment of Green Belt against this purpose will not enable a distinction between land parcels as all Green Belt achieves the purpose to the same extent.

On this basis, purpose 5 was excluded from the assessment.

4.8 Pro Formas

Pro formas was prepared to capture the assessments against each criterion for the General Areas. A copy can be found in Appendix A.

4.9 Stage 1A Conclusion

At this stage, the criterion scores for Purposes 1-3 were collated and tabulated across all of the General Areas, to highlight those areas meeting the purposes to a lesser or greater extent.

Stage 1B: Detailed Site Inspection and Assessment

4.10 Site Appraisal & NPPF Re-evaluation

This assessment built on the Stage 1A assessment, sense checking its initial outputs (particularly in cases of uncertainty) and further developing the qualitative, character-based elements of the work. This included a more thorough examination of whether General Areas might reasonably be identified as “countryside,” thereby satisfying NPPF Purpose 3. Two further discrete strand of works were also undertaken:

- The remaining General Areas were individually assessed to identify areas of particular sensitivity, where a change in land use would not be appropriate (for example, by compromising a broader network of green spaces and corridors);
- Smaller, further refined General Areas which might be less sensitive and thus able to accommodate change were identified and, concurrently, the assessment considered the potential for the boundaries of General Areas to be adjusted without significantly reducing ability to meet NPPF purposes.

This phase of work was carried out collaboratively with Chartered Landscape Architects experienced in Environmental Impact Assessments (EIA).

Descriptive pro formas were produced for each General Area, (incorporated into the Phase 1A pro formas), considering characteristics including, but not limited to:

- Land use;
- Scale;
- Topography;
- Land cover;
- Evidence of agricultural use;
- Internal boundary features;
- Levels of enclosure or openness;
- Connectivity with surrounding open land;
- Sense of tranquillity or remoteness.

This assessment required the application of professional judgement, in line with guidance provided by the Landscape Institute. Where boundary revision might be accommodated to produce a smaller, refined part of a General Area, without compromising surrounding Green Belt, this was noted clearly.

Where possible revisions were identified, the General Area were re-assessed against NPPF Green Belt Purposes 1, 2 and 3 at a strategic level to ensure that the proposed revision would not harm its role in meeting Green Belt purposes. This assessment was undertaken on a qualitative basis and noted within this report.

5 Stage 1A: Key Findings

5.1 Overview

The Hounslow Green Belt area in its entirety, as well as specifically identified non-Green Belt areas, was divided into 28 General Areas (1-25 and A-C) and assessed against purposes 1-3 of the NPPF Green Belt purposes. As set out in Sections 4.7-4.8, the fourth and fifth purposes were not assessed. The completed pro formas for each General Area can be found in Annex Report 1.

5.2 Purpose Scores

Table 5.1 sets out the scores for each General Area against NPPF Purposes 1, 2 and 3. These are then illustrated spatially for each criterion in Maps 5.1-5.3.

5.2.1 Purposes 1 and 2 Assessment

- 15 General Areas within the Green Belt, three fifths of the total, did not meet these Purposes as they are not located at the edge of a discrete urban area. These 15 land parcels are completely enveloped within the Greater London built up area and thus do not restrict the unplanned outward growth of London (sprawl) or provide separation between distinct settlements.
- 10 General Areas met Purposes 1 and 2; of these, three land parcels, 4, 14 and 18, scored particularly weakly across the assessment criteria, whilst four scored highly across all criteria, 16, 17, 19 and 20.
- All three of the non-Green Belt areas fulfil the criteria for Purposes 1 and 2, albeit weakly.

5.2.2 Purpose 3 Assessment

- Aside from parcel 18, all of the Green Belt and non-Green Belt General Areas within the Green Belt meet or would meet this purpose to a varying extent.
- Three Green Belt General Areas, 11, 13 and 19, were deemed to have a largely rural character, based on qualitative and quantitative assessments, and meet this Purpose relatively strongly. No General Areas were given the highest scores of 4 or 5 for this Purpose, reflecting the fragmented nature of the Green Belt within the Borough as well as its broader urban context.
- The majority of Green Belt General Areas, 19 out of 25, scored 2, recognised as possessing some elements of ‘countryside’ but within an urban context. A further three, 7, 21, and 25, were judged to have an urban character despite being relatively open. Individually, these parcels are deemed to meet Purpose 3, though weakly.
- All three non-Green Belt areas meet Purpose 3.





5.3 Summary










- All General Areas meet one or more of the NPPF purposes to varying degrees.
- 14 Green Belt General Areas - 1, 2, 3, 6, 7, 8, 9, 10, 11, 12, 21, 22, 23, 24 and 25 – failed to meet two purposes and scored weakly against the third. A further

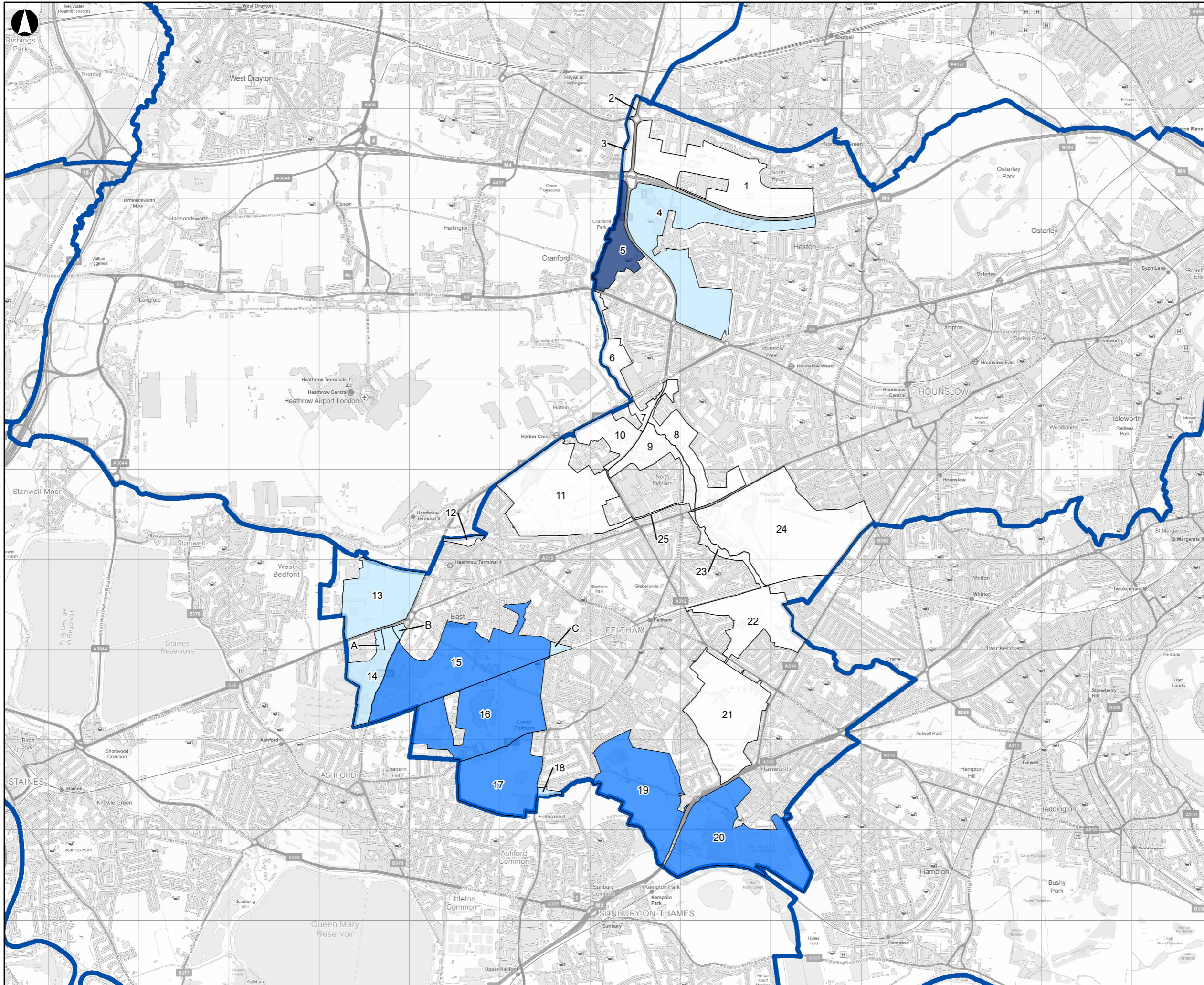
General Area, 18, failed to meet one purpose and scored weakly against the remaining two. Overall, the Council may wish to consider whether, as they serve only one of the NPPF Green Belt purposes weakly, there is continued value in maintaining the designation of these parcels as Green Belt and whether boundary revisions might be appropriate. This was examined further in Stage 1B.

- Two General Areas scored particularly weakly across all purposes, 4 and 14.
- All of the non-Green Belt areas scored across all Green Belt purpose criteria, thus were considered for potential inclusion in the Green Belt in Stage 1B.

Table 5.1 General Area Scores for NPPF Purposes

General Area	Purpose 1 & Purpose 2			Purpose 3
	(a) General Area is located at the edge of a discrete built up area.	(b) Serves as a barrier at the edge of the London built up area in the absence of another durable boundary.	(c) Restricts development that would result in merging of or significant erosion of the gap between neighbouring settlements, based on a judgement of scale of the General Area or the General Area in combination with adjoining Green Belt parcels.	
1	FAIL	0	0	2
2	FAIL	0	0	2
3	FAIL	0	0	2
4	PASS 	1	1	2
5	PASS 	5	1	2
6	FAIL	0	0	2
7	FAIL	0	0	1
8	FAIL	0	0	2
9	FAIL	0	0	2
10	FAIL	0	0	2
11	FAIL	0	0	3
12	FAIL	0	0	2
13	PASS 	1	3	3
14	PASS 	1	1	2

General Area	Purpose 1 & Purpose 2			Purpose 3
	(a) General Area is located at the edge of a discrete built up area.	(b) Serves as a barrier at the edge of the London built up area in the absence of another durable boundary.	(c) Restricts development that would result in merging of or significant erosion of the gap between neighbouring settlements, based on a judgement of scale of the General Area or the General Area in combination with adjoining Green Belt parcels.	Protects the openness of land which is characterised as countryside, based on a qualitative assessment, and is least covered by development.
15	PASS 	3	1	2
16	PASS 	3	3	2
17	PASS 	3	5	2
18	PASS 	1	1	0
19	PASS 	3	3	3
20	PASS 	3	3	2
21	FAIL	0	0	1
22	FAIL	0	0	2
23	FAIL	0	0	2
24	FAIL	0	0	2
25	FAIL	0	0	2
A	PASS 	1	1	3
B	PASS 	1	1	3
C	PASS 	1	1	3



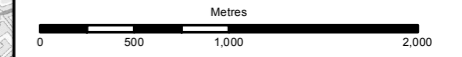
Legend

- 0
- 1
- 2
- 3
- 4
- 5
- General Area Boundary
- Borough Boundary

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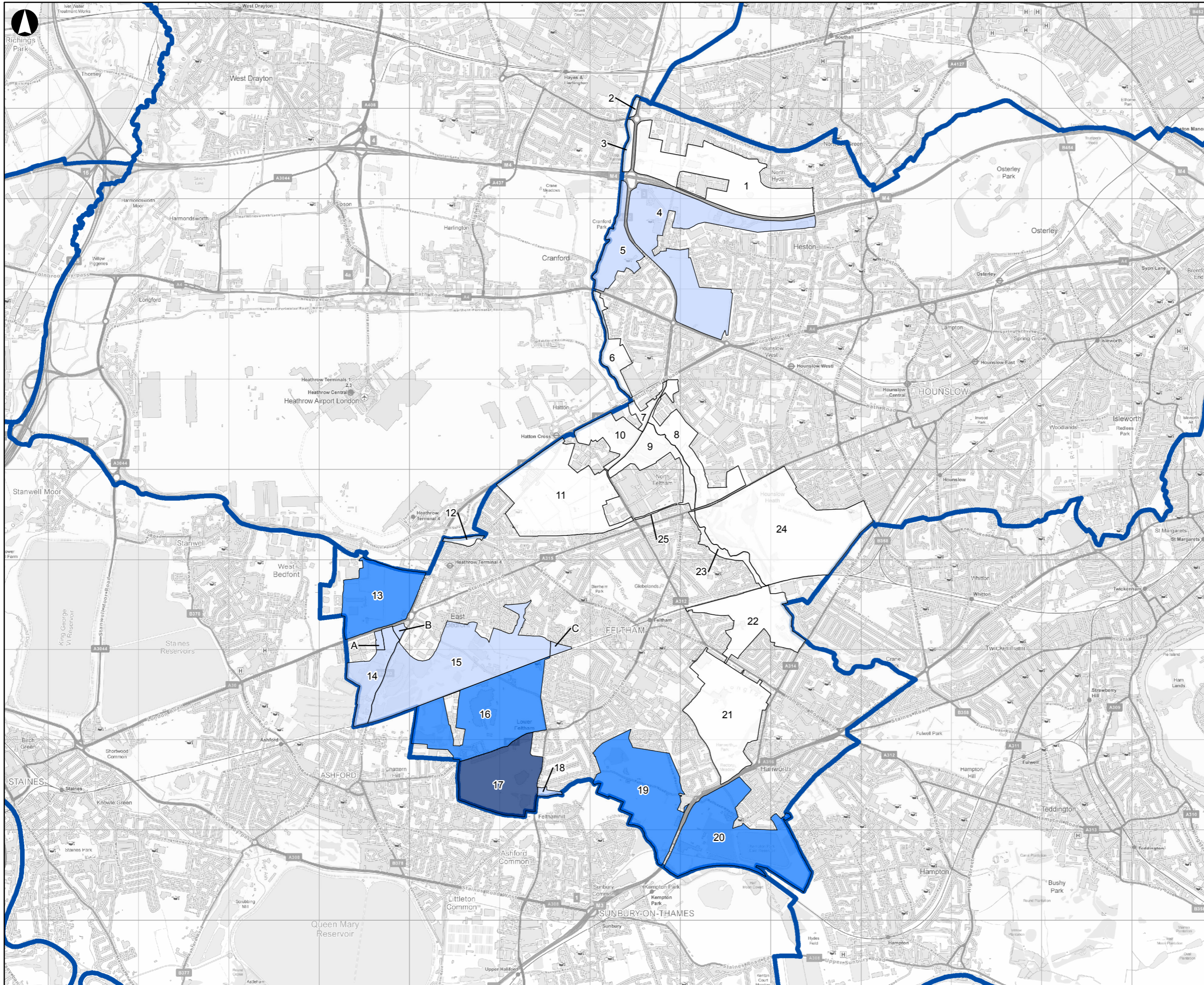
Job Title
Hounslow Green Belt Review

**Map 5.1 Purpose 1 & 2 (b)
 Assessment Scores**

Scale at A3
1:40,000

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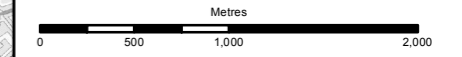
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- 0
- 1
- 2
- 3
- 4
- 5
- General Area Boundary
- Borough Boundary

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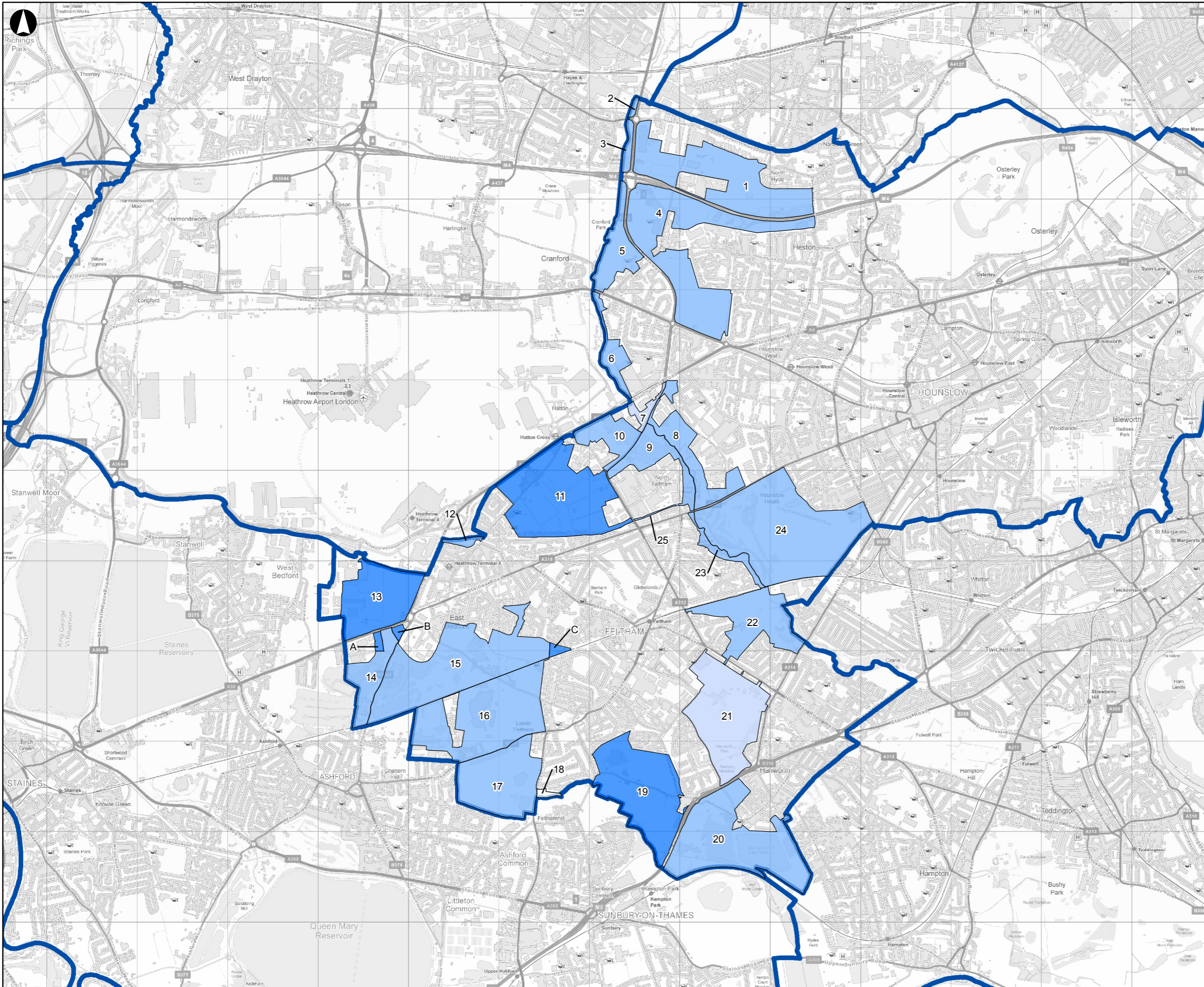
Job Title
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**Map 5.2 Purpose 1 & 2 (c)
 Assessment Scores**

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1:40,000

Job No 240050-00	Drawing Status ISSUE
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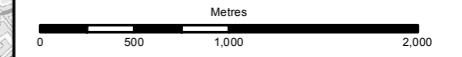
Legend

- 0
- 1
- 2
- 3
- 4
- 5
- General Area Boundary
- Borough Boundary

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Map 5.3 Purpose 3 Assessment Scores

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6 Stage 1B: Assessments & Findings

6.1 Overview

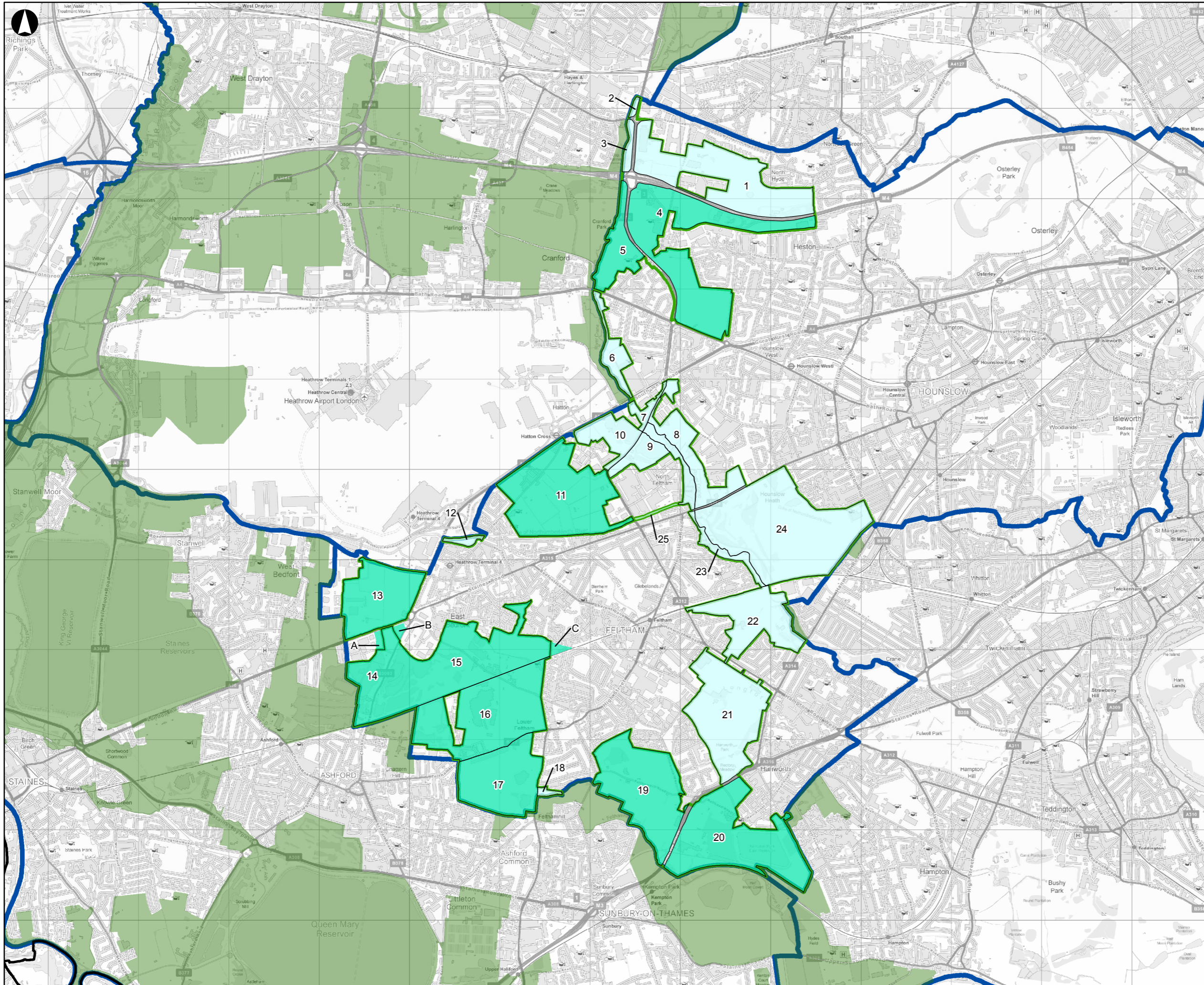
The following section summarises the findings of the Site Appraisal & NPPF Re-evaluation phase of the work and considers whether there are any areas of the Green Belt where boundary revisions may be appropriate. As set out in Section 4.11, this work involved a more detailed analysis of the current and potential Green Belt General Areas which are contributing least to the Green Belt purposes, looking at their landscape character and sensitivity.

Following the Purposes assessment in Stage 1A, Green Belt General Areas have been categorised as follows:

- *Weakest contributing General Areas*, which meet only one of the Purposes to a weak extent. These areas were subject to detailed site analysis through the Landscape Assessment, looking in particular at their role in maintaining strategic gaps and the extent to which they might be described as “countryside” (where applicable), to ascertain whether a judgement should be made on their continued classification as Green Belt in Stage 1B or whether they should proceed automatically to assessment in the Stage 2 assessment.
- *General Areas making some contribution*, which meet the NPPF Purposes, but where particular sub-areas might be considered as standalone areas which, when treated separately, perform weakly. Similarly to the weakest contributing General Areas described above, these were subject to detailed site analysis which additionally considered the existence of permanent, durable internal boundaries which could be used to define small scale sub-areas. These were then subject to re-assessment against the NPPF purposes in Stage 1B before a decision was made on whether to recommend for further analysis in Stage 2, either in part or in full.

Table 6.1 - General Areas Categorisation for Stage 1B

Weakest contributing General Areas	General Areas making some contribution
1, 2, 3, 6, 7, 8, 9, 10, 12, 18, 21, 22, 23, 24, 25	4, 5, 11, 13, 14, 15, 16, 17, 19, 20, A, B, C



Legend

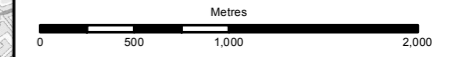
- General Area Making Some Contribution
- Weakest contributing General Areas
- General Area Boundary
- Green Belt Boundary
- Borough Boundary
- Neighbouring Authority Green Belt

1-25 Green Belt land parcels
A-C Non Green Belt land parcels

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Map 6.1 General Area Classification After Stage 1A

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6.2 Landscape Appraisal

The detailed outputs for the Landscape Appraisals are set out on a site by site basis in the Annex 1 pro formas.

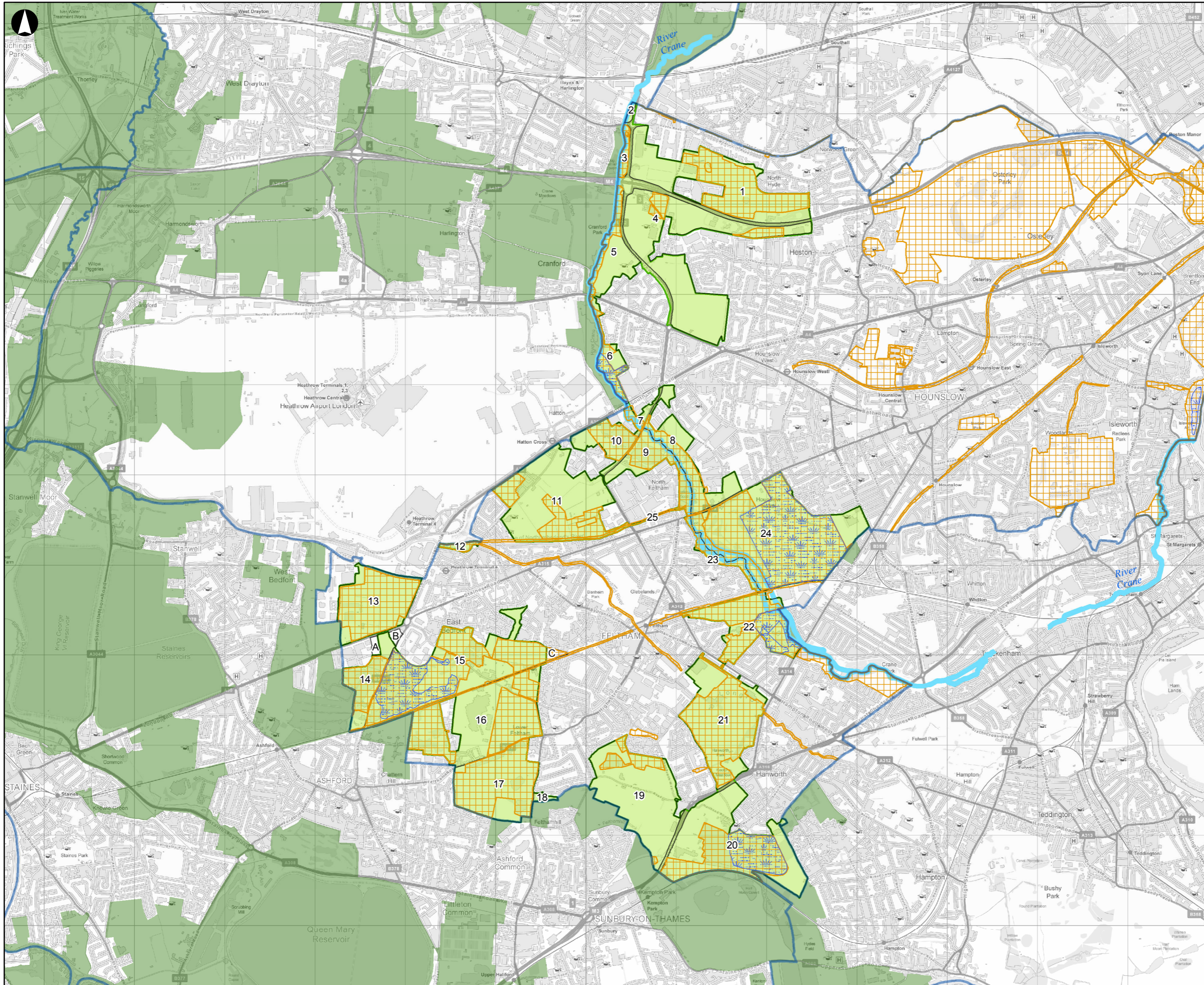
Each ‘General Area’ was assessed and considered in terms of landscape. The overall character of the Green Belt in terms of “countryside” has become diluted due to inter-war and post-war urban sprawl, development of Heathrow and the particular character of areas in Outer London. The Green Belt predominantly consists of woodland, open common and arable farm land, though many General Areas have more of an urban than countryside feeling.








The Crane Valley Corridor, encompassing General Areas 2, 3, 5, 6, 7, 8, 9, 22, 23 and 24, is a significant portion of continuous landscape that runs through the Green Belt, characterised by a number of recurring countryside landscape elements – mature woodland, glades, water bodies, river and accessible recreational footpaths – supporting informal recreation and the movement of ecology and biodiversity in and through the borough (Map 6.2). Although this does not relate directly to the extent to which these General Areas meet the Green Belt purposes, in parts, the corridor forms a distinct boundary, with several sections designated as a Local Nature Reserve or Sites of Nature Conservation Interest (SINCs) – the boundary of the corridor should be reviewed in light of this study and provided ongoing protection and adjoining land to strengthen this resource for the local community and Greater London as a whole (Map 6.2).

A number of areas provide gaps between distinct settlements, with these being identified as such with recommended retention as Green Belt. However, urban sprawl largely arising prior to the designation of the Green Belt has led to significant sections of Green Belt becoming segregated or diluted; for example, General Areas 21 and 22, whilst providing clear definition between the areas of Feltham and Hanworth within the borough, have been almost entirely enveloped by built-form. The Green Belt designation feels somewhat redundant here. However, it should be noted that this area – Hanworth Park - is an important and historic open space and should be protected by an alternative designation if not deemed essential to the long term integrity of the Green Belt, to reflect its status and provide long term protection. Similar observations can be made, for example, of General Areas 6, 7, 8 and 23 (see Annex 1 for more detailed commentary), where particular sections do not meet Green Belt purposes yet provide a positive contribution to the local population as recreational space.

A number of sections, predominantly in the south and west of the borough (General Areas 11, 13 and 19) have a distinct countryside feel, exemplified by the continued use of land for agricultural purposes, both for arable farming and grazing of animals; subject to some possible boundary revisions (see sections 6.3 and 6.4), these areas are recommended for retention as part of the Green Belt.

Following the Landscape Appraisal, in addition to the *General Areas making some contribution*, it was decided that General Area also warranted further examination.

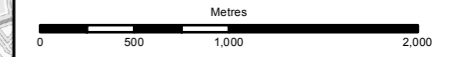


- Legend**
-  River Crane
 -  Local Nature Reserve
 -  SINC
 -  General Area Boundary
 -  Borough Boundary
 -  Neighbouring Green Belt
 -  Hounslow Green Belt

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Client
Hounslow Borough Council

Job Title
Hounslow Green Belt Review

Map 6.2 Hounslow Green Belt and Local Nature Designations

Scale at A3
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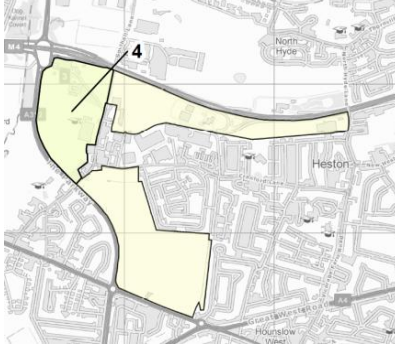
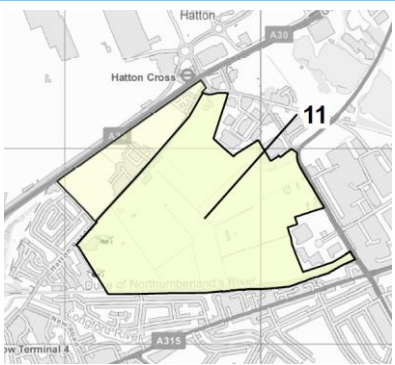
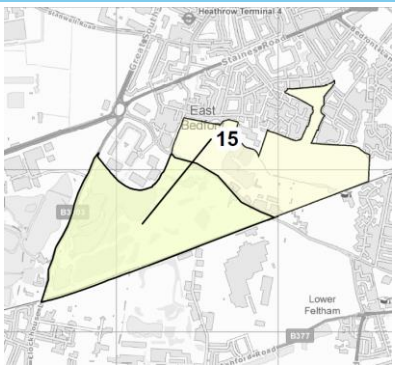
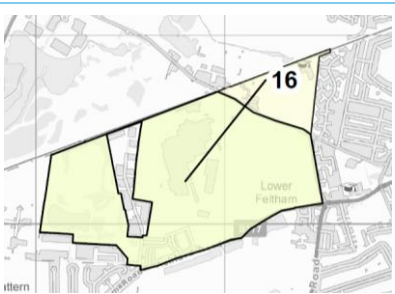
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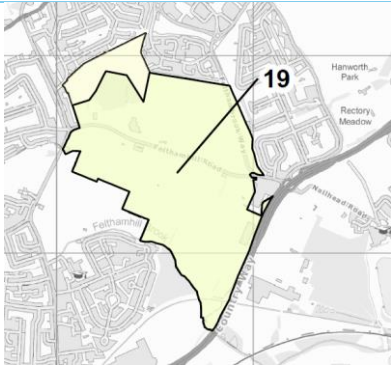
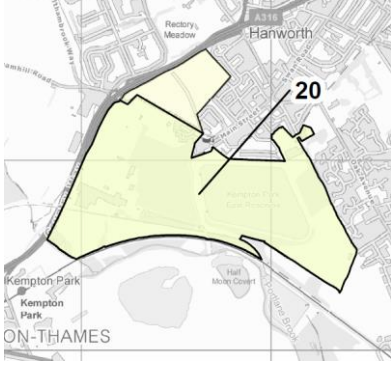
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6.2	P1

6.3 Internal boundaries

Through the detailed site appraisals, for the *General Areas making some contribution*, instances were identified where General Areas might logically be subdivided into small scale sub-areas using permanent, durable boundaries. The output from this assessment is detailed below:

Table 6.2 - Internal Boundary Features

General Area	Potential Internal Boundary Features	Plan
4	In the northern part of the land parcel, east of Southall Lane, the Green Belt is fragmented. Southall Lane and High Street are durable and permanent physical features that would provide strong Green Belt boundaries further to the west.	
11	Hatton Road serves as a durable and permanent physical boundary between a narrow buffer of fragmented Green Belt and the wider Green Belt parcel to the south.	
15	This parcel consists of several unique sub-parcels, divided by a series of infrastructure and landform features. Bedfont Road is a durable, permanent feature which severs the Green Belt and divides two areas with distinctly contrasting characteristics.	
16	Similarly to General Area 15, Bedfont Road would serve as a permanent and durable boundary for the Green Belt.	

<p>19</p>	<p>The copse in the north-west of the land parcel is a strong physical landform which separates a small area of the land parcel from the remainder of the Green Belt and would serve as a durable and permanent boundary.</p>	 <p>A map showing a land parcel highlighted in light green. A specific boundary line, labeled '19', follows a copse in the north-western part of the parcel. The map includes labels for 'Hanworth Park', 'Rectory Meadow', and 'Feltham'.</p>
<p>20</p>	<p>Nailhead Road and Church Road in the far north of the land parcel would perform as permanent, durable Green Belt boundaries.</p>	 <p>A map showing a land parcel highlighted in light green. Two boundary lines, labeled '20', are shown: one along Nailhead Road and another along Church Road in the northern part of the parcel. The map includes labels for 'Rectory Meadow', 'Hanworth', 'Kempston Park', and 'ON-THAMES'.</p>

6.4 NPPF re-assessment

Following the Landscape Appraisal and identification of Internal Boundaries, General Areas with identified small scale sub-areas or meeting Green Belt purposes most strongly were re-assessed against NPPF Purposes 1-3, considering in particular their role in the functionality of the wider Metropolitan Green Belt. The result of this analysis was used to provide recommendations as to whether these General Areas should be fully retained within the Green Belt, included in the Green Belt or whether potential boundary revisions were identified (Table 6.3). This was undertaken at a strategic level; it is anticipated that detailed boundary adjustments may be identified through subsequent work undertaken in the forthcoming Stage 2 assessment.

Table 6.3 – Re-assessment against NPPF Purposes

General Area	Internal boundary Identified?	Commentary and recommendation
4	✓	<p>The land parcel, as a whole, makes a contribution to the wider strategic gap between Heston and Harlington. However, when considered in isolation, the land east of High Street and Southall Lane (the north-east and south-east corners of the General Area), make no contribution to this gap and simply protect land wholly within the built-up area of Greater London, nor do they prevent sprawl (Purposes 1 and 2). Furthermore, the openness of the land east of Southall Lane is already severely compromised by piecemeal physical developments (Purpose 3). The land to the south-east of High Street remains in agricultural use and thus does retain a sense of openness, though it is almost completely severed from the wider Green Belt (albeit connected very weakly at High Street).</p> <p>Recommendation: Consider boundary amendment – small scale sub-areas east of High Street and Southall Lane to be assessed further in Stage 2. Remaining area retained within the Green Belt.</p>
5	×	<p>No logical boundary features were identified which might be used to sub-divide this General Area. The land parcel falls at the edge of Hounslow and has a strong connection with the wider strategic Green Belt which extends westwards towards Berkshire; as a result, there is a real sense that this land is at the edge of the ‘countryside’, despite the designation of part of the land parcel as a park (Purpose 3). Furthermore, although the land parcel forms only a small part of the wider gap between Cranford and Harlington, its role in preventing sprawl is important given the lack of durable boundary features at the urban edge (Purposes 1 and 2).</p> <p>Recommendation: Retain within the Green Belt.</p>
6	×	<p>No logical boundary features were identified which might be used to sub-divide this General Area. The land parcel fails to meet Purposes 1 and 2, but is recognised as playing an important role in terms of strategic links to the wider Green Belt via its connections west into LB Hillingdon. It is also adjudged to provide a naturalistic landscape representative of countryside in an urban setting, thus fulfilling Purpose 3. If the boundaries were amended to remove the area, there is a risk that this might compromise the integrity of the wider Green Belt in this location.</p> <p>Recommendation: Retain within the Green Belt.</p>
11	✓	<p>This land parcel is not at the edge of a distinct built-up area and thus does not prevent sprawl or maintain a gap between distinct</p>

		<p>settlements (Purposes 1 and 2). However, the Landscape Appraisal in particular demonstrated that it does retain a uniquely rural character (including agricultural land uses) and a strong level of openness, despite being relatively constrained by development and being poorly linked to the wider Green Belt (Purpose 3). The small scale sub-area north of Hatton Road has a greater level of fragmentation, the residential developments around Wellington Road and Myrtle Avenue breaking up the openness of the Green Belt here.</p> <p>Recommendation: Consider boundary amendment – small scale sub-area north of Hatton Road to be assessed further in Stage 2. Remaining area retained in the Green Belt.</p>
13	✓	<p>Overall, the land parcel has a uniquely ‘countryside’ character and has strong links to the wider Green Belt which protects the gap between Greater London and Surrey (Purposes 1, 2 and 3). The land parcel has a particularly strong level of openness, which facilitates outward views from Greater London across open arable fields. However, part of the western boundary might be strengthened by amending to the edge of the water treatment works, which would provide a more permanent and durable boundary. This would affect neither the gap nor the openness of the area (Purposes 1, 2 and 3).</p> <p>Recommendation: Consider boundary amendment – small scale sub-area west of the water works boundary to be assessed further in Stage 2. Remaining area retained in the Green Belt.</p>
14	×	<p>No logical boundary features were identified which might be used to sub-divide this General Area. While this General Area performs relatively weakly against the NPPF purposes in isolation, its strategic role in linking other areas of Green Belt is highly important. It forms part of a wider ‘arc’ of Green Belt which prevents Greater London from merging with or sprawling into Surrey (Purposes 1 and 2).</p> <p>Eastern boundary may be strengthened by addition of General Area B to the Green Belt (see below).</p> <p>Recommendation: Retain in the Green Belt.</p>
15	✓	<p>Although this General Area, as a whole, has strong linkage with the wider Green Belt, there is significant severance between the areas to the east and west of Bedfont Road, as well as a significant difference in character. Assessed in isolation, the small scale sub-area east of Bedfont Road does not prevent sprawl or make a significant contribution to the existing wider gap between Greater London and Surrey beyond; indeed, the Bedfont Industrial Estate is a notable man-made barrier and isolates this area from the wider Green Belt somewhat (Purposes 1 and 2). Furthermore, this development reduces the openness of the sub-area substantially and diminishes its sense of rurality (Purpose 3).</p> <p>Recommendation: Consider boundary amendment – small scale sub-area north-east of Bedfont Road to be assessed further in Stage 2 together with General Area C (see below). Remaining area retained in the Green Belt.</p>
16	✓	<p>While the wider land parcel makes an important contribution to the strategic gap between Greater London and Surrey, the small scale sub-area identified north of Bedfont Road, when assessed in isolation, makes little contribution to checking sprawl or preventing the erosion of this gap (Purposes 1 and 2). Also, in the context of the General Area as a whole, it does not contribute to the openness of the wider land parcel (Purpose 3). Furthermore, if considered together with the output for General Area 15 (see above), the sub-area would not result in any loss of linkage to the wider Green Belt.</p>

		Recommendation: Consider boundary amendment – small scale sub-area north-east of Bedfont Road to be assessed further in Stage 2. Remaining area retained in the Green Belt.
17	×	The land parcel provides an essential gap which prevents coalescence between Greater London and Surrey (Purposes 1 and 2) and no logical boundary features were identified which might be used to sub-divide this General Area. Recommendation: Retain in the Green Belt.
19	✓	The overall land parcel provides a sizeable gap between Greater London and Surrey (Purposes 1 and 2) and, in some respects, has a “countryside” feeling (Purpose 3). The small copse in the north-west of the land parcel, north of Snakey Lane, provides a significant natural buffer between the more rural, agricultural section of the land parcel to the south and the managed common land adjacent to the built-up area of Feltham, which is identified as a small-scale sub area. Given the difference in character between these two areas, there is potential for the northern/western fringes of the copse to be adopted as revised Green Belt boundaries. This boundary amendment would have no impact on the ability of the wider Green Belt to prevent sprawl and prevent coalescence (Purposes 1 and 2) and, given it is one of the more ‘urban’ parts of the land parcel, it would (if anything) strengthen the overall ability of the General Area in meeting Purpose 3. Recommendation: Consider boundary amendment – small scale sub-area north-west of the copse to be assessed further in Stage 2. Remaining area retained in the Green Belt.
20	✓	The land parcel makes an important contribution to the wider strategic gap between Greater London and Surrey. Nailhead Road physically divides the General Area, though there is not a noticeable difference in character between the areas north and south of this feature, both of which are well maintained grazing paddocks which contribute an “unspoilt” rural character here. The small-scale sub area, when assessed alone, is one of the strongest areas in terms of its openness and “countryside” character (Purpose 3). Furthermore, although it is not of a significant enough scale to affect Purposes 1 and 2, it is important in maintaining the wider Green Belt arc which stretches to the north – this would be compromised if the boundary were amended here. Furthermore, the existing boundary is already largely durable. Recommendation: Retain in the Green Belt.
A	×	The non-Green Belt parcel is of a very small scale and would make only a very limited contribution to Purposes 1 and 2; its relatively weak score against Purpose 3, predicated as a brownfield site, further weakens the case for inclusion in the Green Belt (particularly given planning permission was recently granted to develop the site). Recommendation: No further consideration for inclusion in the Green Belt.
B	×	The non-Green Belt parcel is of a very small scale and would make only a very limited contribution to Purposes 1 and 2, though it does provide an opportunity to strengthen the Green Belt boundary between the A30 and the B3003, aligning it with the hard edge of the petrol station site. The land parcel is relatively unspoilt and would not detract from (in fact, may enhance) the sense of rurality in the adjacent General Area 14 (Purpose 3).

		Recommendation: Consider further for inclusion in Green Belt in Stage 2.
C	x	<p>The non-Green Belt parcel is of a small scale and would not make an additional discernable contribution to Purposes 1 and 2, though may present an opportunity to strengthen the furthest eastern boundary of General Area 15 by aligning the Green Belt boundary with the backs of houses and the railway line, both more durable and permanent than the existing boundary. The land parcel is of a consistent character with the Green Belt area to the west and consists of open land (Purpose 3).</p> <p>Recommendation: Consider further for inclusion in Green Belt in Stage 2 (in parallel with examination on General Area 15, which may result in boundary amendments rendering inclusion inconsistent).</p>

6.5 Recommendations

Table 6.4 provides a summary of our recommendations, following implementation of the Stage 1A and 1B assessments (Map 6.3). We have recommended one of the following for each Green Belt General Area:










- On-going retention within the Green Belt – no further assessment;
- Partially retained within the Green Belt, with the remaining area taken forward to the Stage 2 assessment;
- Full General Area taken forward to the Stage 2 assessment.








For each non-Green Belt General Area, we have either:

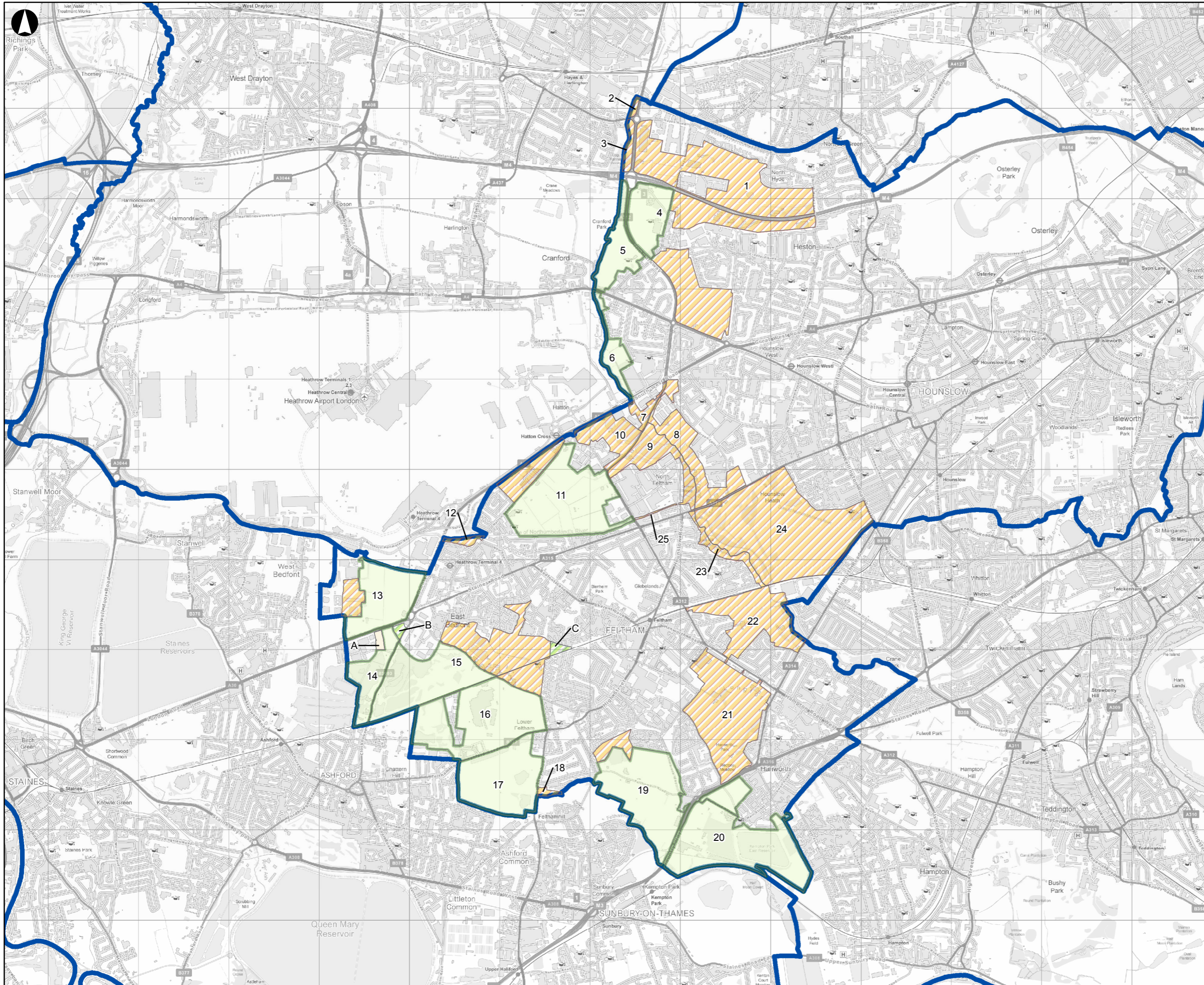
- Recommended that the area be considered further for Green Belt inclusion in the Stage 2 assessment;
- Recommended that the area not be considered further for inclusion in the Green Belt.

While all areas recommended for examination in Stage 2 have been identified consistently in Map 6.3, it should be noted that a series of more detailed recommendations arose from the qualitative Landscape Appraisals (detailed in section 6.2) which should be taken into account when considering future Green Belt boundary amendments. In particular, a number of General Areas were identified as particularly valuable open spaces, serving as valued local gaps in the borough's built-form; notably, this encompasses Hanworth Park, Hounslow Heath and the Crane Corridor (Map 6.4). This should be offered particular attention during the forthcoming Stage 2 assessment.

Table 6.4 – Overall Conclusions from Stages 1A and 1B with Final Recommendations

General Area	Stage 1A	Stage 1B			Recommendation
		Landscape Assessment Completed?	Boundary Identified?	NPPF Reassessment Completed?	
1	Weakest contributing GA	✓			Consider in Stage 2
2	Weakest contributing GA	✓			Consider in Stage 2
3	Weakest contributing GA	✓			Consider in Stage 2
4	GA making some contribution	✓	✓	✓	Part retain; Part consider in Stage 2
5	GA making some contribution	✓	✗	✓	Retain within Green Belt
6	Weakest contributing GA	✓	✗	✓	Retain within Green Belt
7	Weakest contributing GA	✓			Consider in Stage 2
8	Weakest contributing GA	✓			Consider in Stage 2
9	Weakest contributing GA	✓			Consider in Stage 2
10	Weakest contributing GA	✓			Consider in Stage 2
11	GA making some contribution	✓	✓	✓	Part retain; Part consider in Stage 2
12	Weakest contributing GA	✓			Consider in Stage 2
13	GA making some contribution	✓	✓	✓	Part retain; Part consider in Stage 2
14	GA making some contribution	✓	✗	✓	Retain within Green Belt
15	GA making some contribution	✓	✓	✓	Part retain; Part consider in Stage 2
16	GA making some contribution	✓	✓	✓	Part retain; Part consider in Stage 2
17	GA making some contribution	✓	✗	✓	Retain within Green Belt
18	Weakest contributing GA	✓			Consider in Stage 2
19	GA making some contribution	✓	✓	✓	Part retain; Part consider in Stage 2
20	GA making some contribution	✓	✓	✓	Retain within Green Belt

21	Weakest contributing GA	✓		Consider in Stage 2
22	Weakest contributing GA	✓		Consider in Stage 2
23	Weakest contributing GA	✓		Consider in Stage 2
24	Weakest contributing GA	✓		Consider in Stage 2
25	Weakest contributing GA	✓		Consider in Stage 2
A	GA making some contribution	✓		No further consideration for inclusion
B	GA making some contribution	✓		Consider in Stage 2
C	GA making some contribution	✓		Consider in Stage 2



Legend

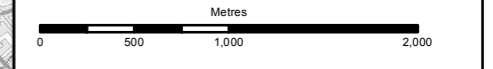
- Retain Within Green Belt
- Consider in Stage 2
- Retain Outside Green Belt
- Consider Adding to Green Belt
- General Area Boundary
- Borough Boundary

1-25 Green Belt land parcels
A-C Non Green Belt land parcels

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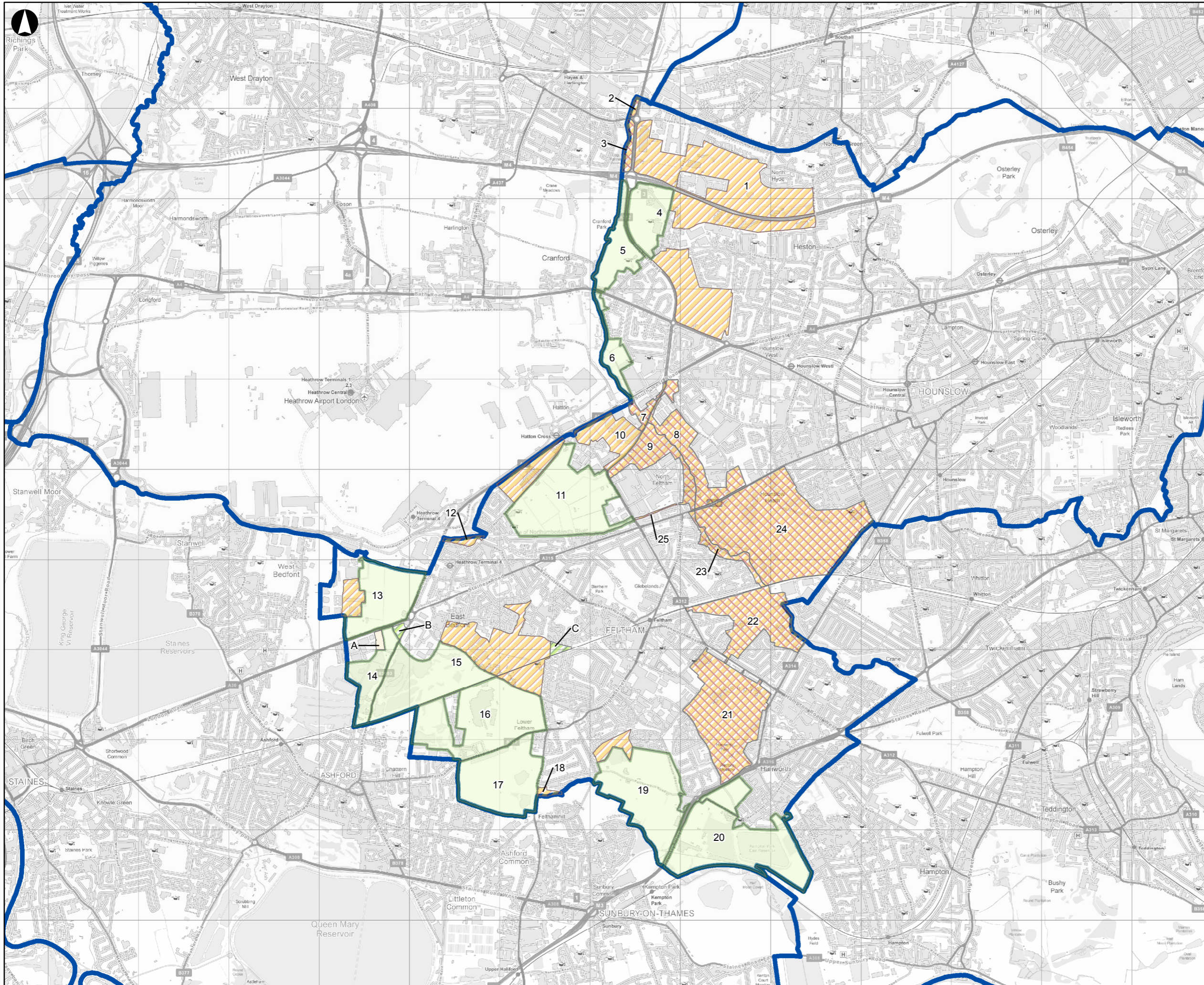
Job Title
Hounslow Green Belt Review

**Map 6.3 Areas Recommended
for Further Assessment**

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Job No 240050-00	Drawing Status ISSUE
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Drawing No 6.3	Issue P1
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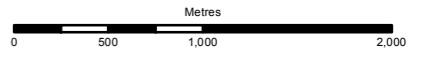
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- Retain Within Green Belt
- Consider in Stage 2
- Retain Outside Green Belt
- Consider Adding to Green Belt
- Areas of Particular Local Value for Consideration in Stage 2
- General Area Boundary
- Borough Boundary

1-25 Green Belt land parcels
A-C Non Green Belt land parcels

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Map 6.4 Areas of Particular Local Value for Consideration in Stage 2

Scale at A3
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Job No 240050-00	Drawing Status ISSUE
Drawing No 6.4	Issue P1

7 Conclusions

This report has examined the performance of the Green Belt in Hounslow in meeting the Green Belt Purposes, as set out in the NPPF, using General Areas as the unit of analysis.

Since its formal adoption in 1956, the Green Belt has performed an important role in preventing sprawl in the London Borough of Hounslow and the further coalescence of settlements. Our assessment has reaffirmed the importance of the Green Belt in maintaining on-going separation between London and settlements in Surrey. Indeed, the Green Belt was initially created to check the growth or outward sprawl of London and the spirit of this rhetoric remains embedded in current national policy. A key issue in Hounslow that emerged strongly from the present assessment is that in many cases the designation of Green Belt in the borough neither prevents the sprawl of London nor separates distinct ‘towns’, despite serving the important functions of breaking up continuous built-form, separating different character areas and providing valuable green space.

Much of the Green Belt in the north and centre of the borough, focused around the Crane Valley, does not ultimately prevent the outward sprawl of Greater London and cannot meet Purpose 1. Development here would rather constitute infill within the existing built form of Greater London. Similarly, the land does not prevent the merging of ‘towns’ necessary to fulfil Purpose 2. Some areas provide a valuable green buffer between different areas of the borough, Hounslow and Feltham for example, though these historically-separate towns had essentially coalesced by the time the Green Belt was first designated as a result of inter-war and post-war development and are now considered different areas of London as opposed to distinct towns. The remaining Green Belt in these parts of the borough is fragmented and largely isolated from the wider Green Belt.

In light of this history it is not surprising that discussion regarding a suitable methodology for considering Purpose 3 in Hounslow – pertaining to the protection of countryside from encroachment -- has surfaced a number of different views. In reference to the wording of this Purpose, as set out in national policy, one of the main focuses of our assessment was to examine the question of what constitutes ‘countryside’ in the borough. All of the Green Belt areas in Hounslow can reasonably said to be under the influence of the urban area to varying extents, and do not have the characteristics of open countryside within an extensive rural landscape that pertain outside of urban areas in many parts of the country.

As detailed in Section 4.5, our methodology examines the character of the General Areas with respect to both openness and the characteristics of countryside, with the latter assessed qualitatively. During the course of the Green Belt Review, an alternative interpretation of Purpose 3 pertinent solely to an urban context emerged; this placed less emphasis on the character of the General Area in favour of considering whether it is serving the purpose of safeguarding adjoining or nearby open countryside from encroachment by urban uses. The findings of the Stage 1 assessment presented in this report provide sufficient flexibility to allow the Council to examine these issues in more detail as part of the anticipated Stage 2 work.

Utilising our dual-criteria approach, the majority of the Green Belt in Hounslow meets Purpose 3, albeit weakly. The site-based Landscape Assessments proved an invaluable supplement to the quantitative and qualitative criteria based assessment carried out for Purpose 3 in Phase 1A. It is important to note that the Crane Valley, which passes through much of the Green Belt, is a strong natural landscape feature despite its urban context. Despite being a valuable environmental and open space asset for the local community, its limited scale and weak connectivity to the wider countryside diminishes its sense of rurality. We have noted areas in our detailed narratives which General Areas, despite fulfilling Green Belt purposes only very weakly, are of local importance as green spaces and where the sense of tranquillity and ‘countryside’ in an urban context should be maintained and possibly strengthened further through the adoption of alternative designations.

To the south and west of borough, areas of more substantial Green Belt land remain, which are crucial to preventing the outward sprawl of London and the merging of Greater London with settlements in neighbouring Surrey. A number of these areas also retain a particular ‘countryside’ character, maintaining rural land uses such as arable farming and horse grazing. Ensuring maximum protection for the strongest performing Green Belt, in line with national policy, should continue to be an important imperative in the formulation of Local Plan policy and a key consideration in the development of the West of Borough Plan.

In addition to identifying potential Green Belt land for release, this study has also considered whether there is any land currently outside the Green Belt which would benefit from a Green Belt designation. In practice, the land that falls within this category corresponded to three larger land parcels considered through previous Green Belt work undertaken in Hounslow. Assessment of these strategic land parcels against the NPPF Purposes suggests there are two land parcels which would merit further consideration as to whether a Green Belt boundary adjustment would be appropriate, in parallel with decisions on the adjoining designated parcels so that the issue of wider connectivity is appropriately taken into account.

It is important to note that the conclusions reached in this study, do not automatically result in the release or inclusion of land in Green Belt. Further decision making by the Council in developing the West of Borough Plan will determine, which, if any, might be released from the Green Belt. The areas identified through this assessment as demonstrating little merit for ongoing designation as Green Belt will be subject to a constraints analysis in Stage 2 to assess what land uses might be appropriate and feasible and whether Green Belt boundary adjustments are required. Subsequently, identified key housing and employment sites should be tested through the Sustainability Appraisal process, as part of a robust approach to develop the future development strategy for Hounslow.

Appendix A

Pro Forma

Pro Forma

General Area			
Area (ha)			
Location Plan			
Purpose	Criteria	Assessment	Score
(1) To check the unrestricted sprawl of large built-up areas (2) To prevent neighbouring towns from merging	(a) General Area is located at the edge of a discrete built up area.		
	(b) Serves as a barrier at the edge of the London built up area in the absence of another durable boundary.		
	(c) Restricts development that would result in merging of or significant erosion of the gap between neighbouring settlements, based on a judgement of scale of the General Area or the General Area in combination with adjoining Green Belt parcels.		
Purposes 1 & 2: Total Score			XX/10
(3) Assist in safeguarding the countryside from encroachment	Protects the openness of land which is characterised as countryside, based on a qualitative assessment, and is least covered by development.		
Purpose 3: Total Score			X/5

Site Photo	
Landscape Commentary	
Scope for Amendment?	