

London Borough of Hounslow  
**Hounslow Green Belt Review**  
**Stage 2**  
Final Report

Final Report | 27 June 2019

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 263470-00

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### Context

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# 1 Introduction

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Arup was appointed by London Borough of Hounslow (LBH) to undertake a partial review of the Stage 1 Green Belt Review (GBR) 2015 to check its compliance with the revised National Planning Policy Framework (NPPF) 2018; and to undertake a Stage 2 Green Belt Review (GBR Stage 2), drawing on the draft Green Belt Review 2017 ('the draft study') undertaken by the council.

The Stage 1 GBR published in April 2015, found that the Green Belt in Hounslow performs a mixed role with regard to the NPPF purposes. To the north and centre of the Borough, the GBR identified areas of Green Belt, which are fragmented and isolated from the wider Green Belt, being under the influence of the urban area and playing a limited role in preventing the sprawl and merging of settlements. However, in many of these cases, the assessment found that the Green Belt served the important function of breaking up continuous built-form, separating different character areas and providing valuable green space. To the south and west of the Borough, the GBR identified areas of more substantial Green Belt land which are crucial to preventing the outward sprawl of London and the merging of Greater London with settlements in neighbouring Surrey, and retain a particular 'countryside' character. The GBR emphasised the importance of ensuring maximum protection for the strongest performing Green Belt, in line with national policy.

The draft study, published in 2017, was developed by the Council to inform preparation of the draft West of Borough Local Plan, which sets out the vision, objectives and options to help guide future development in the western part of the Borough over the next 15 years. As well as reviewing the Green Belt in more detail, the draft study began to set out the Council's case for exceptional circumstances for altering its Green Belt boundaries.

Reflecting recent policy revisions and precedents elsewhere, this study was intended to advance the GBR undertaken by Arup and the draft study undertaken by the Council. This study solely focused upon independent assessment of the Green Belt. The outcomes will form part of the evidence to be used by the Council in developing its spatial strategy. This study also considered whether there is a case for re-designating any of the Green Belt as Metropolitan Open Land (MOL). This report presents the findings of these two assessments.

## 1.1 Site Selection Considerations

The review is not a policy or decision-making document that proposes any release of Green Belt land but it will be an important part of LBH's evidence base. It is not within the remit of the GBR Stage 2 to consider exceptional circumstances arguments, which the NPPF requires as necessary to justify the release of land from the Green Belt. It will fall to LBH to further assess the sustainability and deliverability of areas of land assessed through the GBR Stage 2, as appropriate, as part of the wider plan-making process.

Green Belt will not be the only consideration when assessing the suitability and deliverability of sites identified for allocation in Hounslow. LBH will not be precluded from allocating Green Belt sites for development if other factors in favour of the site outweigh this consideration. There is no clear definition of what amounts to exceptional circumstances to justify alterations of the Green Belt boundary to support proposed site allocations. However, case law and Local Plan EIP precedents<sup>1</sup> suggest that any justification must be responsive to local conditions and take into account a range of factors. Such factors might include:

- Unique / significant housing or employment need and a lack of supply of more preferential sites (i.e. those that the NPPF directs towards before considering Green Belt<sup>2</sup>) - exceptional circumstances cannot be justified based on need alone<sup>3</sup>;
- Adverse implications for the sustainable development strategy within the borough;
- Inherent sustainability of directing growth in a particular direction;
- Tightly drawn Green Belt boundaries and constraints on alternative sites;
- The opportunity to deliver social infrastructure, which would bring about long-term benefits for local residents; or
- Boosting housing delivery in areas with past issues of deliverability in order to increase the supply of affordable housing.

## 1.2 Structure

The report is structured as follows:

- Section 2 considers the context for the Green Belt and MOL assessments based on a review of policy, guidance and experience elsewhere, (the full reviews can be found in Appendix A); and sets out a summary of the assessment methodology (the detailed methodology can be found in Appendix

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<sup>1</sup> The following Local Plan EIP precedents highlight the factors that might be considered by the Council in developing its exceptional circumstances case. Since these Local Plans were subject to Independent Examination under the 2012 NPPF, the examples need to be considered in the context of the latest national policy:

**Redbridge (2018):** *David Smith, Inspector (24 January 2018) Report on the Examination of the Redbridge Local Plan 2015-2030;*

**Guildford (2018):** *Jonathan Bore, Inspector (23 March 2018) Examination of the Guildford Borough Local Plan: Strategy and Sites, Inspector's Questions and Comments (No.1);*

**Derby (2017):** *Mike Moore, Inspector, 2016, Report on the Examination into the Derby City Local Plan Part 1: Core Strategy;*

**Vale of White Horse (2016):** *Malcolm Rivett, Inspector (25 May 2016) Vale of White Horse Local Plan 20131: Part 1 Examination – Inspector's Interim Findings;*

**Birmingham (2016):** *Roger Clews (11 March 2016) Report on the Examination of the Birmingham Development Plan; and*

**Bromsgrove (2016)**

<sup>2</sup> See: National Planning Policy Framework (2019) paragraph 133.

<sup>3</sup> See: Planning Practice Guidance, Paragraph: 044 Reference ID: 3-044-20141006; and *Calverton Parish Council v Nottingham City Council & Ors (2015) EWHC 1078 (Admin)*. It should be noted that the Planning practice guidance will, where necessary, be updated in due course to reflect changes to the 2019 NPPF.

B). It also explores the relationship between this and the preceding Green Belt studies and sets out the assessment areas.

- Section 3 presents the key findings and recommendations of the Green Belt assessment.
- Section 4 sets out the key findings and recommendations of the MOL assessment.
- Section 5 provides the conclusions of the assessments.

The accompanying Annex Report presents the assessment pro-formas for each of the assessed sub-areas.

## 2 Context & Methodology

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### 2.1 Context

The purpose of a Green Belt Review is to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in the NPPF. Local planning authorities may then take the findings of the review into account alongside other evidence in making decisions about their Local Plan Strategy, site allocations and ultimately possible alterations to Green Belt boundaries.

#### 2.1.1 Green Belt

The GBR set out the relevant national and local policy framework for undertaking such an assessment, as well as relevant guidance and good practice identified elsewhere. As far as this is still relevant given the publication of the revised NPPF, it has continued to shape the methodology for the GBR Stage 2. This section therefore identifies additional findings from a review of policy, guidance and experience elsewhere since the GBR was undertaken (Appendix A), in particular the implications for undertaking this assessment.

The key findings of the review which have implications for the GBR Stage 2 are:

- There is no Government defined methodology for carrying out a Stage 2 assessment and local authorities have therefore taken a variety of approaches to-date.
- Openness and permanence are key considerations in terms of features of the Green Belt; and are therefore integral to the assessment of Green Belt across all Purposes<sup>4</sup>.
- Openness should be considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’ (for example, visual linkages between settlements in relation to Purpose 2, or functional character and linkages to the wider Green Belt in relation to Purpose 3)<sup>5</sup>.
- Green Belt should be assessed against the Purposes set out in the NPPF and, if any purpose is to be excluded, there must be a robust rationale. Any methodology must clearly set out how the Purposes have been interpreted and should respect the local context, for example, in relation to the definition of key terms<sup>6</sup>.

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<sup>4</sup> See: National Planning Policy Framework (2018) paragraph 133; and Mel Middleton, Inspector (December 2017) *Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan*.

<sup>5</sup> See: *Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin)*.

<sup>6</sup> See: David Smith, Inspector, (24 January 2018), *Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030*

- A thorough approach must be taken to the identification of sub-areas for assessments, particularly where there is a risk that objectively assessed housing need would not be met without amending Green Belt boundaries<sup>7</sup>.
- Detailed Green Belt assessment does not need to be carried out for land covered by major policy constraints including, for example flood zone 3b or sites of international or national nature conservation importance, which would preclude development in any case<sup>8</sup>.

### 2.1.2 Metropolitan Open Land

In order to understand potential implications for the Council in considering the case for re-designating Green Belt as MOL, a review of planning policy and experience elsewhere has been undertaken (Appendix A). The key findings of this are:

- Extensions to MOL are supported by the London Plan (2016) and the emerging London Plan (2018) where the land meets at least one of the MOL criteria<sup>9</sup>.
- There is limited precedent for re-designating Green Belt land as MOL, particularly post publication of the NPPF in 2012. In the case of the LB Ealing (pre-NPPF), the Inspector accepted that a change in designation was sound due to the limited performance of the site against the Green Belt purposes, its limited connection to the wider Green Belt, and the equal weighting given to the protection of MOL as Green Belt<sup>10</sup>.

## 2.2 Methodology

The Green Belt and MOL assessments followed parallel but complementary workstreams, which are summarised in sections 2.2.1 and 2.2.2 respectively. Full details of the assessment processes can be found in Appendix B.

### 2.2.1 Green Belt Assessment

A stepped approach was undertaken for this study, as summarised in Figure 2.1. As explored further in section 2.3, potential areas and sites for assessment were identified and filtered against major policy constraints (Step 1).

The boundaries of the sub-areas to be assessed were defined in line with the NPPF (2018, Para 139) Green Belt boundary definition, (Step 2).

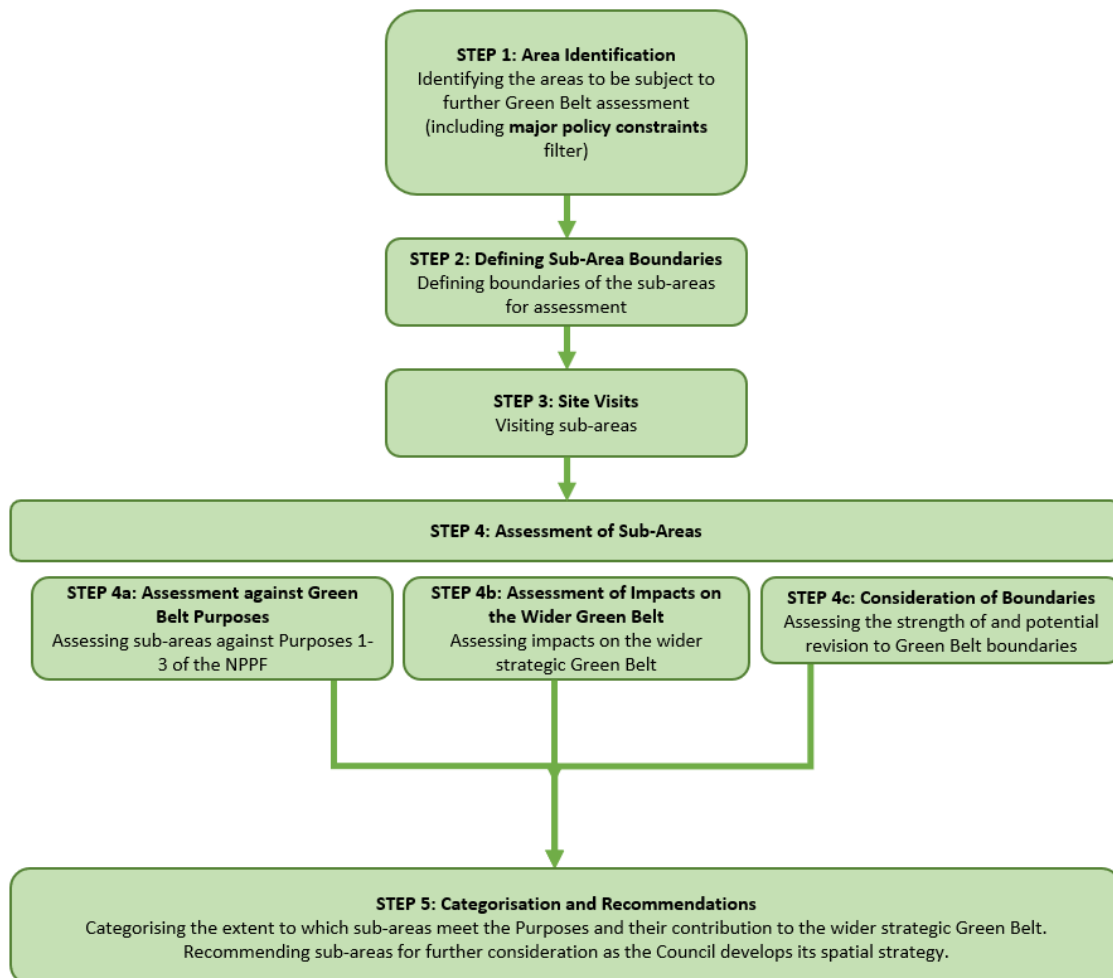
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<sup>7</sup> See: Mel Middleton, Inspector (December 2017), *Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan*.

<sup>8</sup> *ibid*

<sup>9</sup> See: Policy 7.17, London Plan (consolidated with alterations since 2011), 2016.

<sup>10</sup> See: Ealing Council Development (or Core) Strategy DPD, Inspector's Report, 2012.

**Figure 2.1 Green Belt Assessment Process**

The Green Belt assessment process itself (Step 4) drew on both primary evidence from site visits (Step 3) and desktop research; and comprised three main strands:

- An assessment against NPPF purposes 1-3 using qualitative and quantitative measures to reach a composite judgement as to the performance of the Green Belt (Step 4a);
- An assessment of the impacts on the wider Green Belt, if a sub-area was to be released, including cumulative and neighbouring authority impacts (Step 4b); and
- Consideration of the strength of sub-area boundaries and whether mitigation might be required if the sub-area was released (Step 4c).

The Step 4 assessment strands were brought together in Step 5 to present recommendations as to whether a sub-area, or part thereof, should be potentially considered for release.

The findings from the application of the methodology and the recommendations developed are captured in the pro formas in the Annex Report.

## 2.2.2 MOL Assessment

The GBR identified a number of General Areas that perform weakly against the NPPF purposes, but that serve an important role as open space, providing valued gaps in the Borough's built form. In addition, as set out in section 2.2.1, the GBR Stage 2 identified those areas and sites subject to major policy constraints (Step 2). The key purpose of the MOL assessment was therefore to determine whether these areas could be re-designated as MOL. The areas identified for the MOL Assessment were evaluated against each of the four London Plan MOL Criteria (A-D), using a five-point scale and supporting definitions for each criterion, where 1 = weak performance against the criterion and 5 = strong performance. The criteria, definitions and attributes for assessment are presented in Appendix B2.

An overall score was developed for each parcel, based on the highest scoring criteria, with narrative justification and noting variations and anomalies. This judgement was used to determine whether the existing Green Belt land should be re-designated either partly or fully as MOL, or alternatively whether the land should not be re-designated as MOL in the case of extremely weak performance against the criteria. For parcels identified for re-designation as MOL, the narrative justification was used as the basis for development of a strategy and supporting recommendations in relation to either conserving, enhancing or restoring parcels and elements within, in line with MOL objectives.

The findings from the application of the methodology and the recommendations developed are captured in the pro formas in the Annex Report.

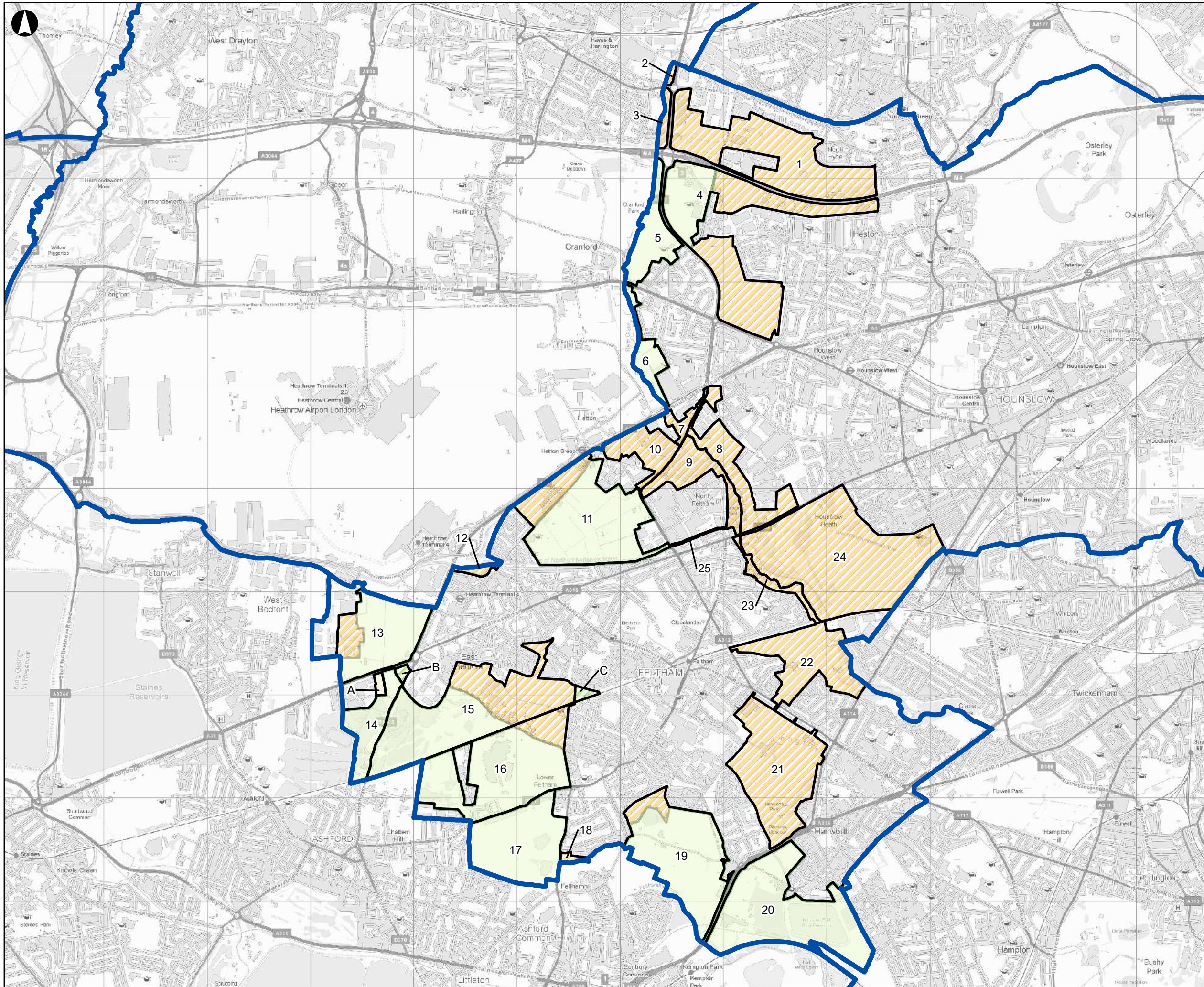
## 2.3 Assessment Areas

This section explores the relationship between the preceding studies and this review; and sets out the areas included in the Green Belt and MOL assessments.







### 2.3.1 GBR Stage 1

As part of the GBR Stage 1, the entirety of the Green Belt in Hounslow (as defined in the saved policies in the 2003 adopted Unitary Development Plan) was assessed. In total 25 strategic land parcels, referred to as 'General Areas' were assessed against the NPPF purposes for Green Belt. The Stage 1 review also included an initial appraisal of the Green Belt in terms of landscape. The study recommended that (Figure 2.2):

- Five General Areas should be fully retained within the Green Belt (5, 6, 14, 17, 20);
- 14 General Areas perform weakly against the NPPF Purposes and should be considered further by the Council as potential areas for release from the Green Belt (1, 2, 3, 7, 8, 9, 10, 12, 18, 21, 22, 23, 24, 25).
- Nine of which, were considered to be of Areas of Particular Local Value in terms of their open space value and role as part of wider green corridors, including Hanworth Park, Hounslow Heath and the Crane Corridor (2, 3, 7, 8, 9, 21, 22, 23, 24).

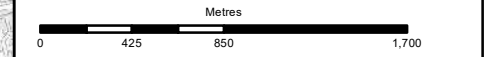


**Legend**

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

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**Figure 2.2 Recommendations from the 2015 GBR**

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- Six General Areas should be considered further for potential sub-division, (4, 11, 13, 15, 16, 19).

In addition, the GBR also considered non-Green Belt land outside (the defined) urban areas for potential inclusion within the Green Belt. Three non-Green Belt land parcels, General Areas (A-C), were also assessed against the NPPF purposes. The study concluded that:

- Two General Areas should be considered further for potential inclusion within the Green Belt (B, C); and
- One General Area should not be considered further for inclusion within the Green Belt (A).

### 2.3.2 'Draft Study'

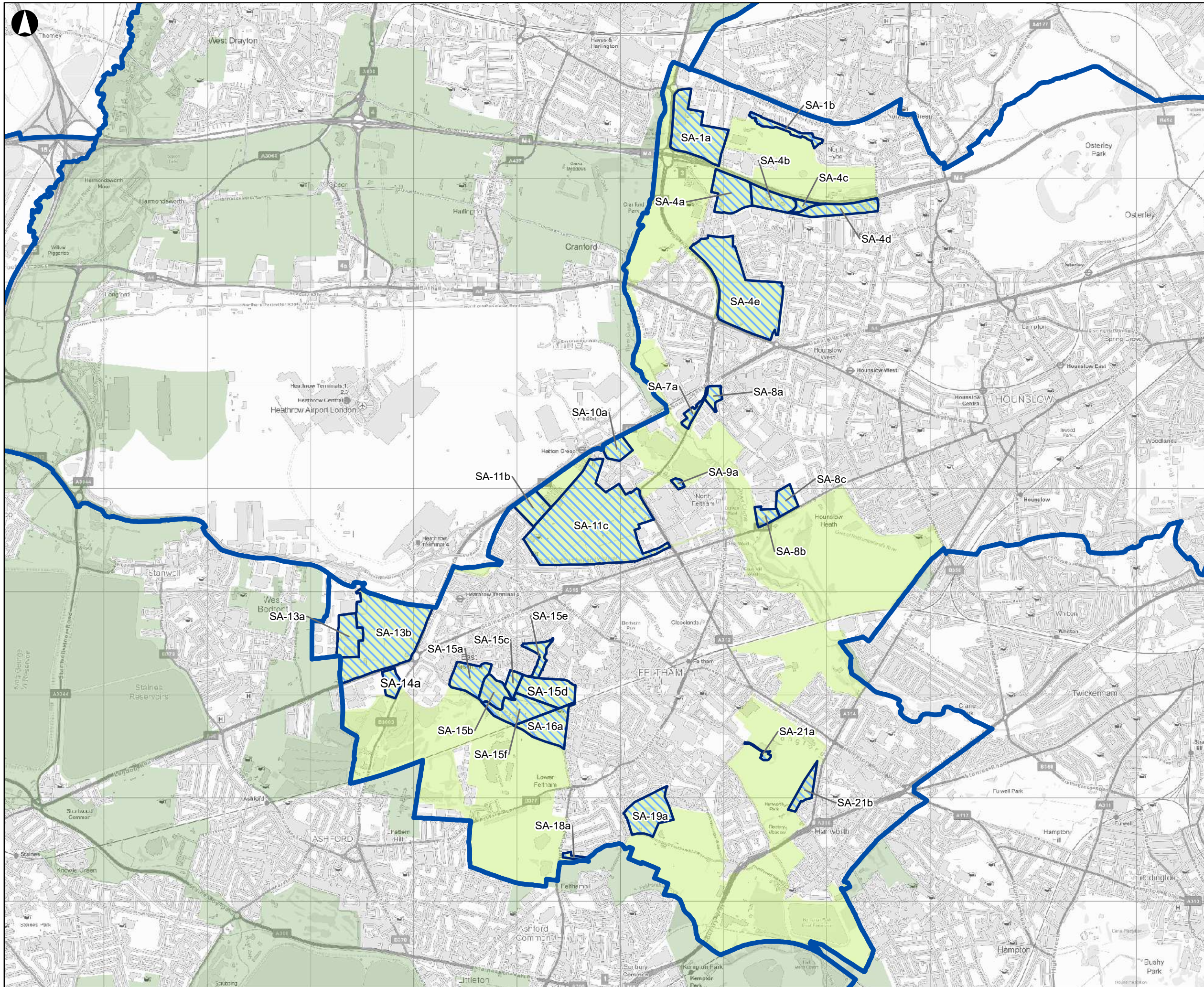
The Council's 2017 Green Belt Review, the 'draft study' considered 21 areas comprising: the 14 General Areas identified as performing weakly in their entirety; the six General Areas recommended for potential sub-division; one of the General Areas recommended for retention (GA6) that the Council thought merited additional consideration; and the two General Areas identified for further consideration for inclusion within the Green Belt.

The Council concluded:

- Five General Areas should be considered for release from the Green Belt, partially for development /Locally Significant Industrial Site with the remainder re-designated as MOL (1, 4, 8, 10, 11, 22);
- Eight General Areas should be considered for release from the Green Belt and re-designated entirely as MOL (2, 3, 6, 7, 9, 21, 23, 24);
- One General Area should be considered for release from the Green Belt and re-designated as open space (25);
- One General Area should be considered for partial release from the Green Belt with the remainder for development (15);
- One General Area should be considered for partial release from the Green Belt, with the released part re-designated as open space (16);
- Five General Areas should be retained within the Green Belt (5, 12, 14, 17, 18, 19, 20);
- One General Area should be identified as Safeguarded Land (13); and
- Two General Areas (B, C) should not be considered further for inclusion as Green Belt.

### 2.3.3 GBR Stage 2 Assessment Areas

This study was more spatially focussed than the preceding GBR Stage 1 and Draft Study, and therefore only smaller defined 'sub-areas' were assessed. The sub-areas (Figure 2.3) were defined based on:

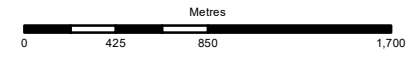


**Legend**

-  Borough Boundaries
-  Neighbouring Green Belt
-  Hounslow Green Belt
-  Sub-areas for Green Belt Assessment

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**Figure 2.3 Sub-areas for Green Belt Assessment**

Scale at A3  
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Drawing No <b>2.3</b>	Issue <b>P1</b>
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- Areas identified for further consideration in the preceding studies; and
- Sites within the Green Belt emerging from the Council's own capacity work in the West of Borough area.

Sub-areas were refined to discount areas entirely or largely subject to major policy constraints. Finally, sub-areas were reviewed and potentially amended to avoid any future anomalies in the Green Belt, such as islands, and to regularise boundaries.

Key points to note include:

- Those General Areas assessed as weakly performing in their entirety in the GBR Stage 1 were generally not assessed further as a whole parcel as they had already been identified as recommended areas, to be considered further for potential release as part of the Council's wider spatial strategy development. However, in some cases the Council's emerging capacity study sites overlapped with these General Areas and a more refined assessment was undertaken for sub-areas defined on the basis of the capacity study sites.
- Those GBR Stage 1 General Areas recommended for part retention in the Green Belt and part for further consideration at Stage 2, were considered as follows:
  - Parts for retention were generally not assessed further as they had already been recommended for retention in the Green Belt. However, in some cases the Council's emerging capacity study sites overlapped with these areas and were therefore subject to further assessment, excluding those areas entirely or largely subject to major policy constraints;
  - Parts for further consideration at Stage 2 were assessed in their totality, excluding those areas entirely or largely subject to major policy constraints. These areas were divided into sub-areas and where applicable incorporated the Council's emerging capacity study sites.
- In some instances, the Council's emerging capacity study sites included non-Green Belt land. Those located wholly within non-Green Belt land were excluded from further assessment and boundaries were amended for those only partially within the Green Belt.
- All sub-areas defined for assessment were subject to boundary refinement in line with Step 2 of the methodology (see Section 2.2.1 and B1.2) Therefore, the resultant sub-areas do not necessarily align with the Council's emerging capacity study sites or the GBR Stage 1 areas recommended for further consideration. The sub-areas may have been increased or reduced in size to meet the most defensible Green Belt boundaries, to account for major policy constraints and to exclude non-Green Belt land.
- Seven out of the eight General Areas recommended for whole or partial release as developable or safeguarded land in the 'draft study' were included within the Stage 2 Green Belt Assessment. Conversely, a further seven General Areas were included in the Stage 2 assessment, which had not been identified as having developable land in the 'draft study'. The differences in

all instances relate to the presence, or otherwise, of sites within the General Area emerging from the Council's own capacity work in the West of Borough area. The capacity information provided a more recent basis on which to identify sub-areas for this more granular assessment; and therefore, provided the basis of the defining the sub-areas.

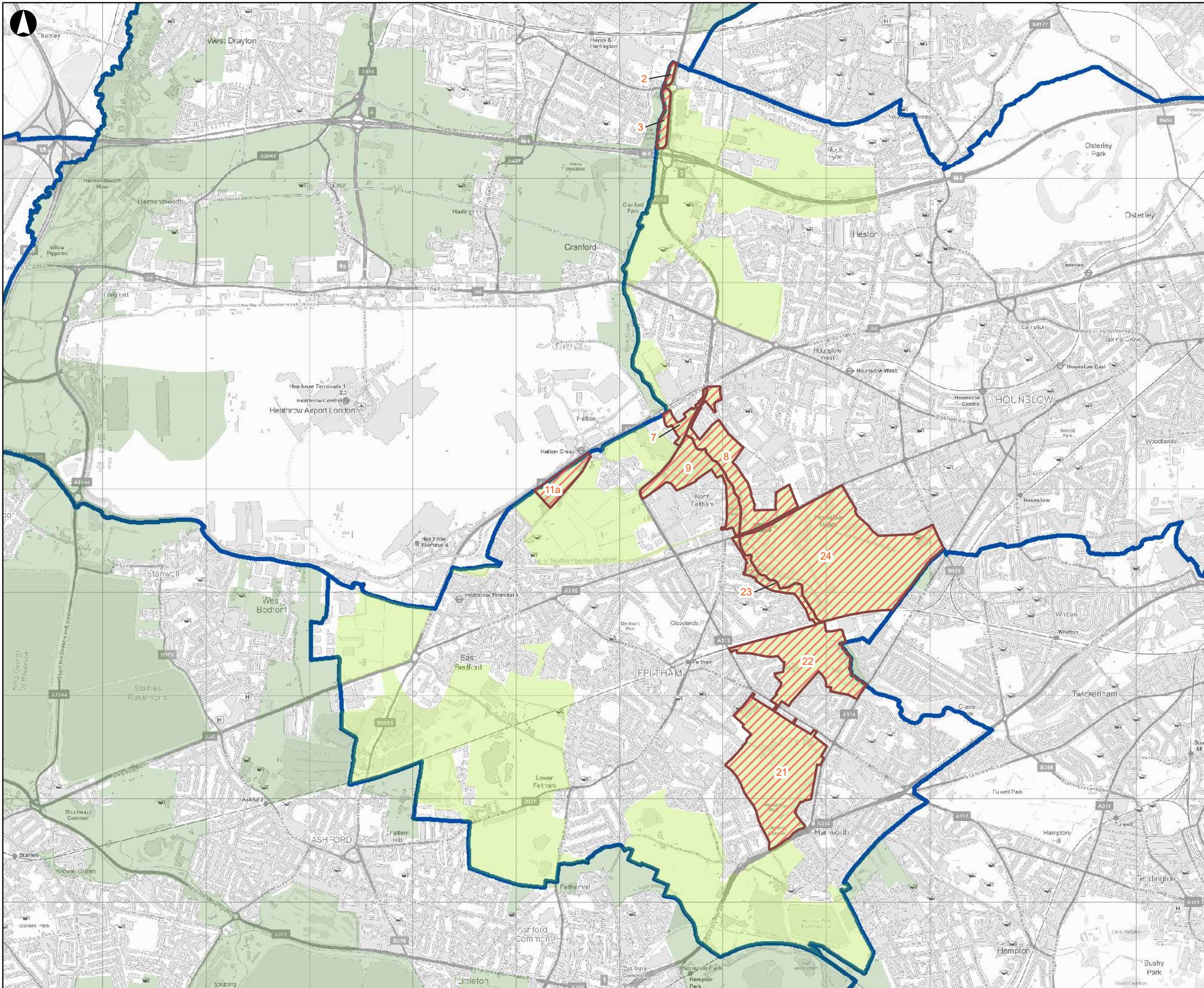
### 2.3.4 MOL Assessment Areas

The MOL assessment areas (Figure 2.4) were defined:

- Weakly performing General Areas identified in the GBR Stage 1 as being of particular local importance in terms of their open space value and role as part of wider green corridors;
- Parts of General Areas recommended for potential sub-division which are subject to major policy constraints (following Step 2 of the Stage 2 GBR); and
- Sites within the General Area from the Council's own emerging capacity work in the West of Borough area which are subject to major policy constraints.

Key points to note include:

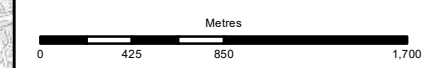
- Twelve out of the 16 General Areas recommended for whole or partial release as MOL in the 'draft study' were included within the Stage 2 MOL Assessment. The four excluded General Areas (1, 6, 4, 10) were omitted for the following reasons:
  - The landscape assessment undertaken as part of the Stage 1 GBR had not identified these General Areas as areas of particular local value in terms of their open space value and role as part of wider green corridors (MOL assessment criteria 1- refer to Section B2); and
  - The parts of General Area 4 recommended through the Stage 1 GBR for potential sub-division, and the sites within General Areas 1 and 10 from the Council's own emerging capacity work in the West of Borough area were primarily unaffected by major policy constraints (MOL assessment criteria 2- refer to Section B2). This criterion was not applicable to General Area 6 as there were no recommended areas for potential sub-division in Stage 1 nor were any sites identified through the emerging capacity work.



- Legend**
- Borough Boundaries
  - Neighbouring Green Belt
  - Hounslow Green Belt
  - General Areas (GBA) & sub-areas for MOL Assessment

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**Figure 2.4 General Areas and Sub-areas for MOL Assessment**

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### 2.3.5 Sub-area Summary

Table 2.1 provides an overview of the conclusions reached for the General Areas assessed as part of the preceding studies (GBR Stage 1 and 'Draft Study') and sets out how these areas have been included in this Stage 2 review; both in terms of the Green Belt and MOL assessments. The table identifies the assessment areas for this study.

**Table 2.1 Summary of GBR Stage 1 and Draft Study Conclusions and Inclusion of General Areas within Stage 2 Assessments**

General Area	GBR Stage 1 Conclusions		'Draft Study' Conclusions		General Area Includes Emerging Capacity Site	Major Policy Constraints <sup>11</sup>	Stage 2 Assessment			
	Consider Further	Area of Particular Local Value	Consider Further	MOL Potential			Green Belt Sub-Area	Green Belt Notes	MOL GA or Sub-Area	MOL Notes
1	Weakly performing, consider further for release	✘	✓	✓	✓	n/a	Y	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Refined sub-areas (SA-1a and SA-1b) assessed for Stage 2 based on emerging capacity sites.	N	General Area not identified as having particular local value in GBR, nor were SA-1a and SA-1b affected by major policy constraints.
2	Weakly performing, consider further for release	✓	✓	✓	✘	n/a	N	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Further assessment not undertaken as no emerging capacity site(s).	Y	GBR & Draft Study conclusions both indicate consider further. General Area identified as having particular local value in GBR. Assessed as General Area 2.
3	Weakly performing, consider further for release	✓	✓	✓	✘	SMI	N	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Further assessment not undertaken as no emerging capacity site(s).	Y	GBR & Draft Study conclusions both indicate consider further. General Area identified as having particular local value in GBR. Assessed as General Area 3.
4	Part retain, part consider in Stage 2	✘	✓	✓	✓	Public Safety Zone	Y	GBR and Draft Study conclusions both indicate consider part of GA further. Emerging capacity site partially overlapped area recommended for further consideration in GBR. Refined sub-areas (SA-4a, SA-4b, SA-4c and SA-4d) assessed for Stage 2 based on emerging capacity sites and area recommended for further consideration in GBR.	N	Area not identified as having particular local value in GBR. Major policy constraints cover small proportion of SA-4e, which would not form a logical parcel for MOL assessment.
5	Retain	✘	✘	✘	✘	SMI	N	In line with GBR and Draft Study, retain within Green Belt, no further assessment.	N	N/A – given the area was identified to be retained as Green Belt at Stage 1, no further assessment was undertaken.
6	Retain	✘	✓	✓	✘	Flood Zone 3b, Public Safety Zone	N	GBR concluded retain within the Green Belt while the Draft Study suggested conversion to MOL. Given the presence of significant areas of major policy constraint and therefore no development potential, no further assessment undertaken.	N	N/A – given the area was identified to be retained as Green Belt at Stage 1, no further assessment was undertaken.
7	Weakly performing, consider further for release	✓	✓	✓	✓	SMI, Flood Zone 3b	Y	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Refined sub-area (SA-7a) assessed for Stage 2 based on emerging capacity site.	Y	GBR & Draft Study conclusions both indicate consider further. General Area identified as having particular local value in GBR. Assessed as General Area 7.
8	Weakly performing, consider further for release	✓	✓	✓	✓	Flood Zone 3b, Public Safety Zone, SMI	Y	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Refined sub-areas (SA-8b and SA-8c) assessed for Stage 2 based on emerging capacity sites. Additional sub-area (SA-8a) assessed for Stage 2 based on potential for a future anomaly ('island') in the Green Belt.	Y	GBR & Draft Study conclusions both indicate consider further. General Area identified as having particular local value in GBR. Assessed as General Area 8.
9	Weakly performing, consider further for release	✓	✓	✓	✓	Flood Zone 3b, Public Safety Zone, SMI	Y	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Refined sub-area (SA-9a) assessed for Stage 2 based on emerging capacity site.	Y	GBR & Draft Study conclusions both indicate consider further. General Area identified as having particular local value in GBR. Assessed as General Area 9.

<sup>11</sup> Extent of major policy constraint varies. Figure B1.2 shows the mapped extent of the constraints.

General Area	GBR Stage 1 Conclusions		'Draft Study' Conclusions		General Area Includes Emerging Capacity Site	Major Policy Constraints <sup>11</sup>	Stage 2 Assessment			
	Consider Further	Area of Particular Local Value	Consider Further	MOL Potential			Green Belt Sub-Area	Green Belt Notes	MOL GA or Sub-Area	MOL Notes
10	Weakly performing, consider further for release	✘	✓	✓	✓	Public Safety Zone, SMI	Y	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Refined sub-area (SA-10a) assessed for Stage 2 based on emerging capacity site.	N	Given the General Area was not identified as having particular local value in GBR, no further assessment was undertaken.
11	Part retain, part consider in Stage 2	✘	✓	✓	✓	Public Safety Zone	Y	GBR and Draft Study conclusions respectively indicate consider part / whole of GA further. Emerging capacity site partially overlaps area for further consideration in GBR. Refined sub-areas assessed for Stage 2 based on emerging capacity study sites (SA-11c) and area recommended for further consideration in GBR (SA-11b).	Y	Area not identified as having particular local value in GBR. However, the part of area proposed for further consideration in GBR and an overlapping emerging capacity study site were subject to a major policy constraint. Assessed as sub-area SA11-a.
12	Weakly performing, consider further for release	✘	✘	✘	✘	n/a	N	GBR conclusion indicated potential for release of the whole GA; however Draft Study suggested retention within the Green Belt. Further assessment not undertaken as no emerging capacity site(s).	N	Neither GBR nor Draft Study identify MOL potential. Area not identified as having particular local value in GBR, nor affected by major policy constraints.
13	Part retain, part consider in Stage 2	✘	✓	✘	✓	n/a	Y	GBR and Draft Study conclusions respectively indicate consider part / whole of GA further. Emerging capacity site does not overlap area recommended for further consideration in GBR. Refined sub-areas assessed for Stage 2 based on emerging capacity site (SA-13b) and area recommended for further consideration in GBR (SA-13a).	N	Neither GBR nor Draft Study identify MOL potential. Area not identified as having particular local value in GBR, nor affected by major policy constraints.
14	Retain	✘	✘	✘	✓	SMI	Y	GBR and Draft Study conclusions both suggest retention within the Green Belt. However, refined sub-area assessed for Stage 2 based on emerging capacity site (SA-14a).	N	Neither GBR nor Draft Study identify MOL potential. Emerging capacity site not subject to a major policy constraint.
15	Part retain, part consider in Stage 2	✘	✓ (partial)	✘	✓	SMI	Y	GBR and Draft Study conclusions both indicate consider part of GA further. Capacity sites partially overlap area for further consideration in GBR. Refined sub-areas (SA-15a, SA-15b, SA-15c, SA-15d, SA-15e and SA-15f) assessed for Stage 2. based on emerging capacity sites and area recommended for further consideration in GBR.	N	Neither GBR nor Draft Study identify MOL potential. Area not identified as having particular local value in GBR, nor affected by major policy constraints (i.e part for consideration in Stage 2).
16	Part retain, part consider in Stage 2	✘	✓ (partial)	✘	✓	SMI	Y	GBR and Draft Study conclusions both indicate consider part of GA further. Capacity sites partially overlap area recommended for further consideration in GBR. Refined sub-area (SA-16a) assessed for Stage 2 based on emerging capacity sites and area recommended for further consideration in GBR.	N	Neither GBR nor Draft Study identify MOL potential. Area not identified as having particular local value in GBR nor affected by major policy constraints (i.e part for consideration in Stage 2).
17	Retain	✘	✘	✘	✘	n/a	N	In line with GBR and Draft Study, retain within Green Belt, no further assessment.	N	N/A – given the area was identified to be retained as Green Belt at Stage 1, no further assessment was undertaken.
18	Weakly performing, consider	✘	✘	✘	✓	n/a	Y	GBR concluded potential for release of the whole GA, while the Draft Study suggested retention. However, refined sub-area (SA-18a) assessed for Stage 2 based on emerging capacity site.	N	Neither GBR nor Draft Study identify MOL potential. Area not identified as having particular local value in GBR, nor affected by major policy constraints.

General Area	GBR Stage 1 Conclusions		'Draft Study' Conclusions		General Area Includes Emerging Capacity Site	Major Policy Constraints <sup>11</sup>	Stage 2 Assessment			
	Consider Further	Area of Particular Local Value	Consider Further	MOL Potential			Green Belt Sub-Area	Green Belt Notes	MOL GA or Sub-Area	MOL Notes
	Further for release									
19	Part retain, part consider in Stage 2	*	*	*	*	n/a	Y	GBR concluded partial release, while the Draft Study suggested retention. Refined sub-area (SA-19a) assessed for Stage 2 based on area recommended for further consideration in GBR.	N	Neither GBR nor Draft Study identify MOL potential. Area not identified as having particular local value in GBR, nor affected by major policy constraints.
20	Retain	*	*	*	*	SMI, SPA	N	In line with GBR and Draft Study, retain within Green Belt, no further assessment.	N	N/A – given the area was identified to be retained as Green Belt at Stage 1, no further assessment was undertaken.
21	Weakly performing, consider further for release	✓	✓	✓	✓	n/a	Y	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Refined sub-areas (SA-21a and SA-21b) assessed for Stage 2 based on emerging capacity sites.	Y	GBR & Draft Study conclusions both indicate consider further. General Area identified as having particular local value in GBR. Assessed as General Area 21.
22	Weakly performing, consider further for release	✓	✓	✓	*	Flood Zone 3b, SMI	N	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Further assessment not undertaken as no emerging capacity site(s).	Y	GBR & Draft Study conclusions both indicate consider further. General Area identified as having particular local value in GBR. Assessed as General Area 22.
23	Weakly performing, consider further for release	✓	✓	✓	*	Flood Zone 3b, SMI	N	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Further assessment not undertaken as no emerging capacity site(s).	Y	GBR & Draft Study conclusions both indicate consider further. General Area identified as having particular local value in GBR. Assessed as General Area 23.
24	Weakly performing, consider further for release	✓	✓	✓	*	SMI	N	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Further assessment not undertaken as no emerging capacity site(s).	Y	GBR & Draft Study conclusions both indicate consider further. General Area identified as having particular local value in GBR. Assessed as General Area 24.
25	Weakly performing, consider further for release	*	✓	*	*	SMI	N	GBR and Draft Study conclusions both indicate potential for release of the whole GA. Further assessment not undertaken as no emerging capacity site(s).	N	Neither GBR nor Draft Study identify MOL potential. Area not identified as having particular local value.
A	Exclude from Green Belt	*	*	*	*	n/a	N	Further assessment not undertaken as GBR recommended excluding from Green Belt.	N	Neither GBR nor Draft Study identify MOL potential.
B	Potential to be Green Belt, consider further	*	*	*	✓	n/a	N	N/A – site under development.	N	N/A – site under development.
C	Potential to be Green Belt, consider further	*	*	*	*	n/a	Y	GBR conclusion indicates consider further, although the Draft Study suggests the General Area should not be re-assessed. Given the site was identified to be incorporated into Green Belt at Stage 1, no further assessment was undertaken.	N	Neither GBR nor Draft Study identify MOL potential

Notes: SMI = Site of Metropolitan Importance for Nature Conservation (SMI); SPA = Special Protection Area

## 3 Green Belt Key Findings

This section summarises the key findings from the assessment of the 29 sub-areas against the NPPF purposes (Step 4a), consideration of the role of the sub-areas as part of the wider strategic Green Belt (Step 4b), consideration of boundaries (Step 4c) and categorisation and recommendations for each sub-area (Step 5).

The detailed pro-formas setting out the assessments for each sub-area can be found in the Annex Report.

### 3.1 Step 4a: Assessment of Sub-Areas against Purposes 1-3 of the NPPF

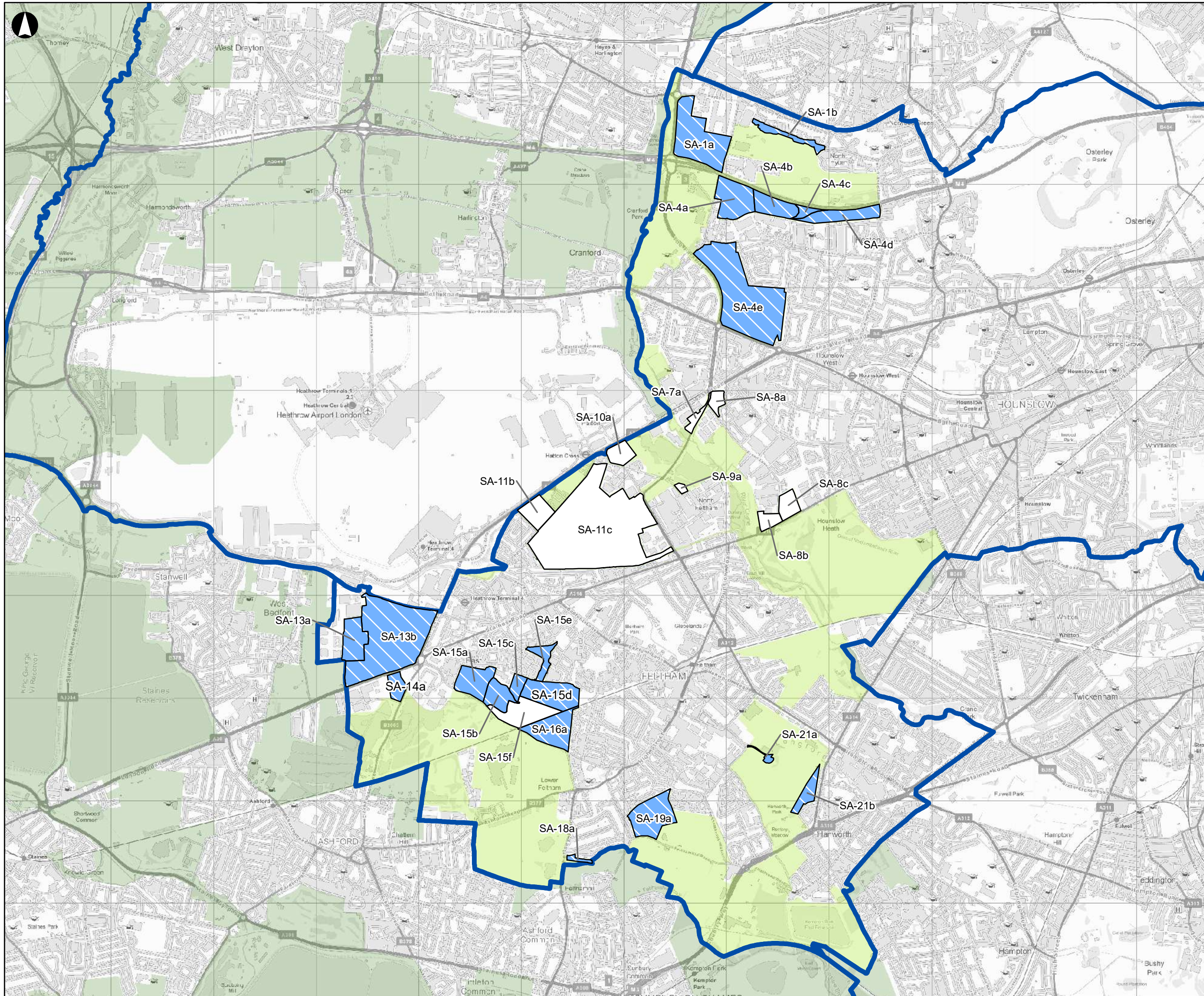
**Purpose 1: To check the unrestricted sprawl of large built-up areas & Purpose 2: To prevent neighbouring towns from merging**

#### 3.1.1 Criteria a Assessment




The findings of the (Purpose 1 and 2) criteria a assessment are presented in Table 3.1 and Figure 3.1. Twenty of the sub-areas (69%) are located at the edge of a large built-up area and therefore pass (Purpose 1 and 2) criteria a. The majority of these sub-areas are located in the north and the south of Hounslow with a connection to the Greater London large built-up area. Those sub-areas which fail (Purpose 1 and 2) criteria a are located within the Greater London large built-up area and predominantly fall in the centre of Hounslow. These sub-areas were not assessed against (Purpose 1 and 2) criteria b as they do not play a role in preventing sprawl due to their enclosure by the large built-up area.

**Table 3.1 Criteria (a) Summary of Scores**

Criteria a Score	Number of Sub-areas	Sub-areas
Pass	20	1a, 1b, 4a, 4b, 4c, 4d, 4e, 13a, 13b, 14a, 15a, 15b, 15c, 15d, 15e, 16a, 18a, 19a, 21a, 21b,
Fail	9	7a, 8a, 8b, 8c, 9a, 10a, 11b, 11c, 15f



**Legend**

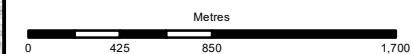
-  Borough Boundaries
-  Neighbouring Green Belt
-  Hounslow Green Belt

**(Purpose 1 and 2) Criteria a Scores**

-  Fail
-  Pass

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**Figure 3.1 (Purpose 1 and 2) Criteria a Scores**

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**1:35,000**

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**263470-00**

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**Final Issue**

Drawing No  
**3.1**

Issue  
**P1**

### 3.1.2 Criteria b Assessment

The findings of the Purpose (1 and 2) criteria b assessment are presented in Table 3.2 and Figure 3.2. Thirteen of the sub-areas (45%) were identified as performing weakly against (Purpose 1 and 2) criteria b, concentrated within the GBR Stage 1 General Areas 1, 4 and 15. These areas are either enclosed within the large built-up areas and therefore do little to prevent sprawl (i.e. score 0), or they have strong inner and outer boundary features that provide effective barriers to sprawl (i.e. score 1). In these cases, the Green Belt provides an additional barrier to sprawl.

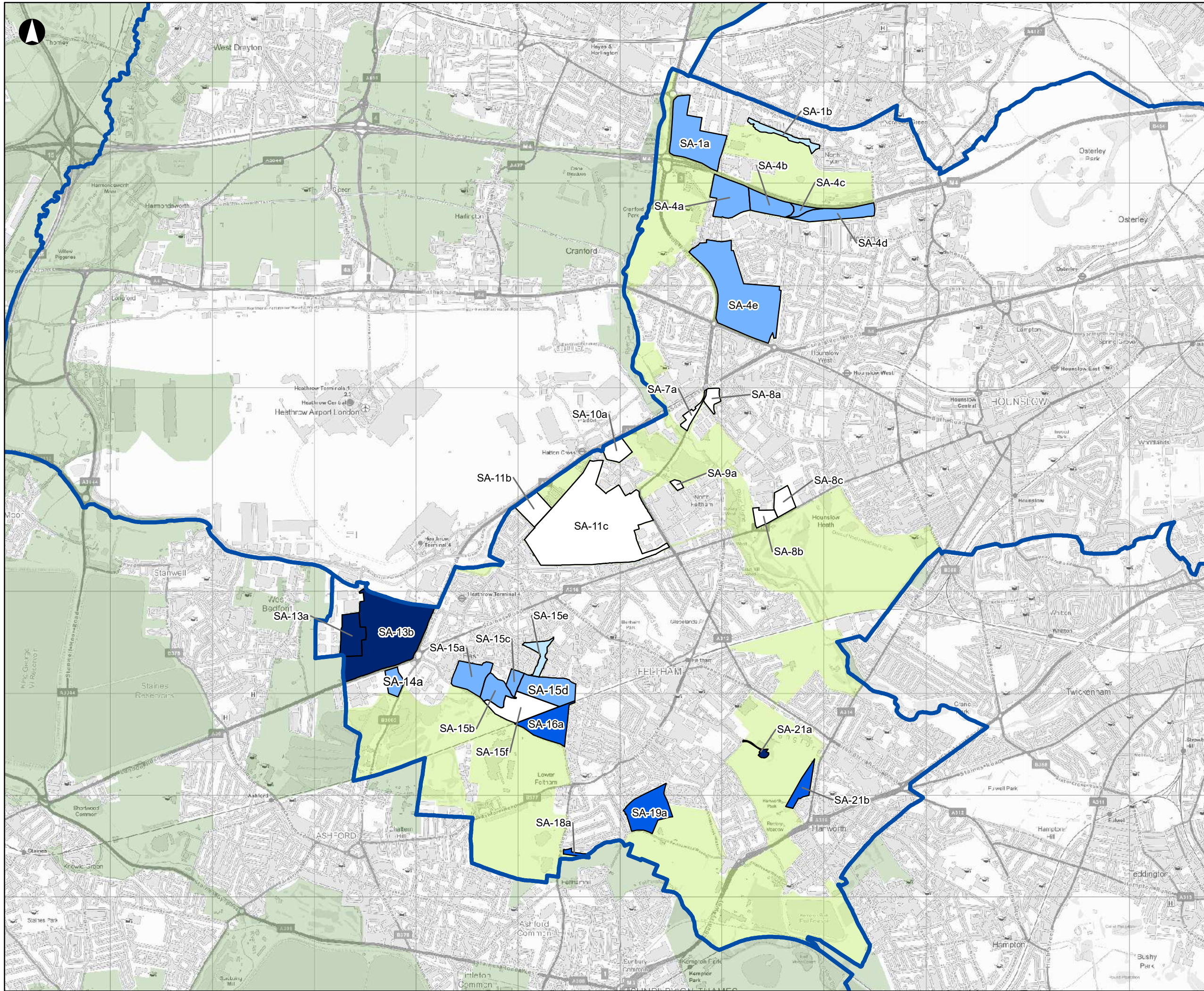
**Table 3.2 Criteria b Summary of Scores**

Criteria b Score	Number of Sub-areas	Sub-areas
5	3	13a, 13b, 21a
3	4	16a, 18a, 19a, 21b
1	11	1a, 4a, 4b, 4c, 4d, 4e, 14a, 15a, 15b, 15c, 15d
0	2	1b, 15e

Four sub-areas (14%) were identified as performing moderately against (Purpose 1 and 2) criteria b, concentrated in the south of Hounslow. These areas have either a strong inner boundary that prevents sprawl, or a strong recognisable outer boundary feature (within a reasonable distance of the sub-area) that functions to prevent outward sprawl. As there is a strong boundary feature present (either inner or outer), the Green Belt acts as an additional barrier to sprawl.

Three sub-areas (10%) were identified as performing strongly against (Purpose 1 and 2) criteria b, by preventing the outward sprawl of the Greater London large built-up area. The majority of these sub-areas are located in the south of Hounslow, near the borough boundary with Spelthorne.

Nine of the sub-areas (31%) were not assessed against (Purpose 1 and 2) criteria b as they do not lie at the edge of a large built-up area and therefore do not pass (Purpose 1 and 2) criteria a.



**Legend**

- Borough Boundaries
- Neighbouring Green Belt
- Hounslow Green Belt

(Purpose 1 and 2) Criteria b Scores

- N/A
- 0
- 1
- 3
- 5

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**Figure 3.2 (Purpose 1 and 2)  
Criteria b Scores**

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Scale at A3  
**1:35,000**

Job No <b>263470-00</b>	Drawing Status <b>Final Issue</b>
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Drawing No <b>3.2</b>	Issue <b>P1</b>
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### 3.1.3 Criteria (c) Assessment

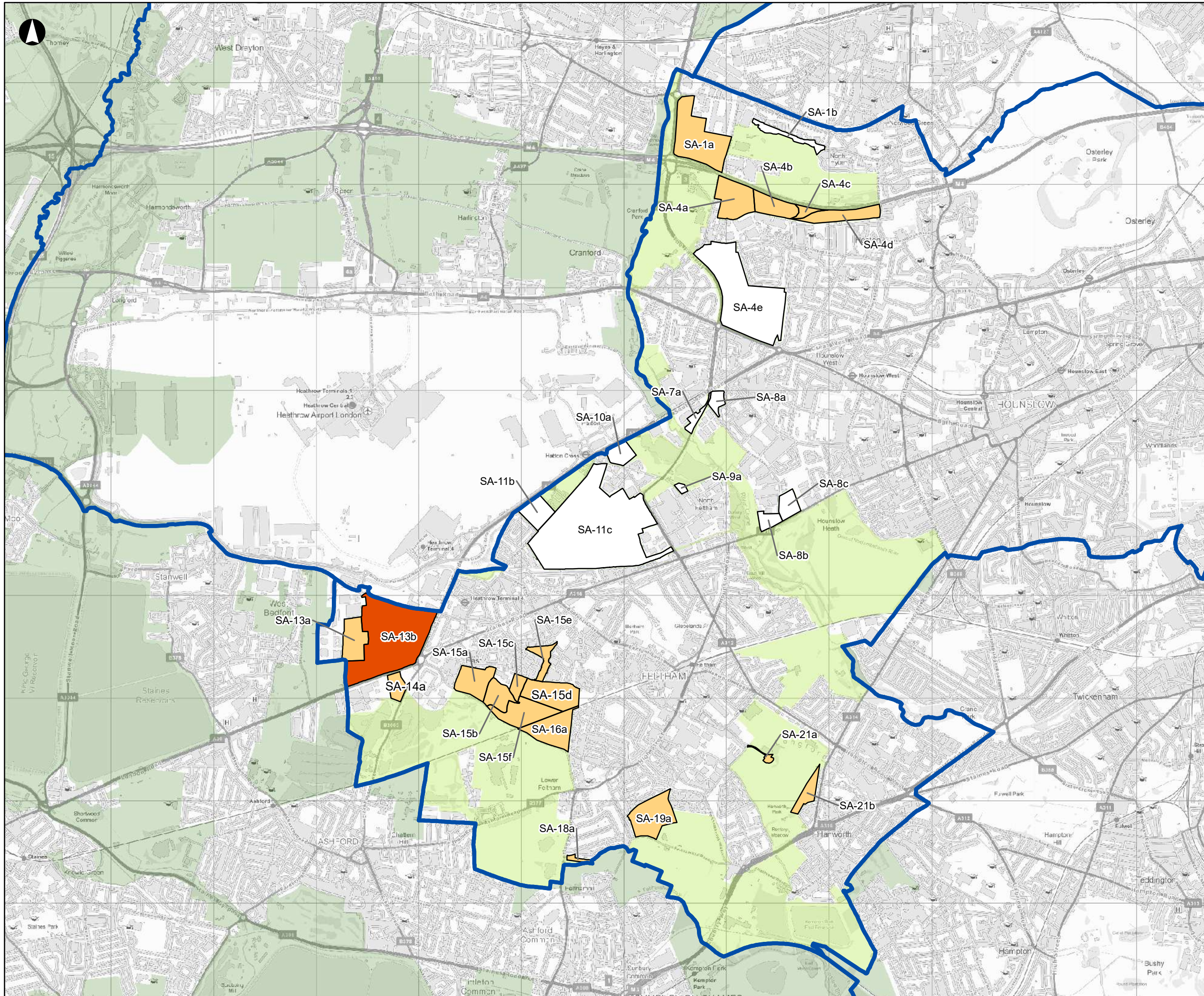
The findings of the criteria (c) assessment are presented in Table 3.3 and Figure 3.3. Twenty-eight of the sub-areas (97%) were identified as performing weakly against Purpose 1 and 2 criteria c, scoring a 1 or a 0. Ten of these sub-areas, make no discernible contribution to the separation of neighbouring built-up areas in physical or perceptual terms as they lie within the Greater London built-up area and do not form part of a gap. The remaining eighteen of these sub-areas play a limited role in preventing settlements from merging as a result of their relatively limited scale within a gap, or as a result of physical or topographical features which restrict the potential for coalescence. The majority of the sub-areas in Hounslow play a weak role in preventing the merging of settlements due to the urbanised nature of the Greater London built-up area.

**Table 3.3 Criteria (c) Summary of Scores**

Criteria (c) Score	Number of Sub-areas	Sub-areas
5	0	N/A
3	1	13b
1	18	1a, 4a, 4b, 4c, 4d, 13a, 14a, 15a, 15b, 15c, 15d, 15e, 15f, 16a, 18a, 19a, 21a, 21b
0	10	1b, 4e, 7a, 8a, 8b, 8c, 9a, 10a, 11b, 11c

Whilst no sub-areas were identified as performing strongly against Purpose 1 and 2 criteria c, one sub-area was identified to play a moderate role (Sub-area 13b). This sub-area forms a smaller part of a wider gap, which although is not ‘essential’ for preventing the merging of settlements, it nonetheless contributes to the openness and general scale of the overall gaps.

There are no sub-areas that were identified as performing strongly against Purpose 1 and 2 c by preventing settlements from merging. This is a result of the location of the sub-areas within the Greater London built-up area. As Heathrow Airport also lies within the Greater London built-up area, it further lessens the importance of Hounslow Green Belt in preventing the merging of Greater London and Harlington large built-up area to the north.



**Legend**

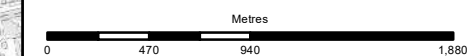
- Borough Boundaries
- Hounslow Green Belt
- Neighbouring Green Belt

(Purpose 1 and 2) Criteria c Score

- 0
- 1
- 3
- 5

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**Figure 3.3 (Purpose 1 and 2)  
Criteria c Scores**

Scale at A3 <b>1:35,000</b>	
Job No <b>263470-00</b>	Drawing Status <b>Final Issue</b>
Drawing No <b>3.3</b>	Issue <b>P1</b>

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

### 3.1.4 Purpose 3 Assessment

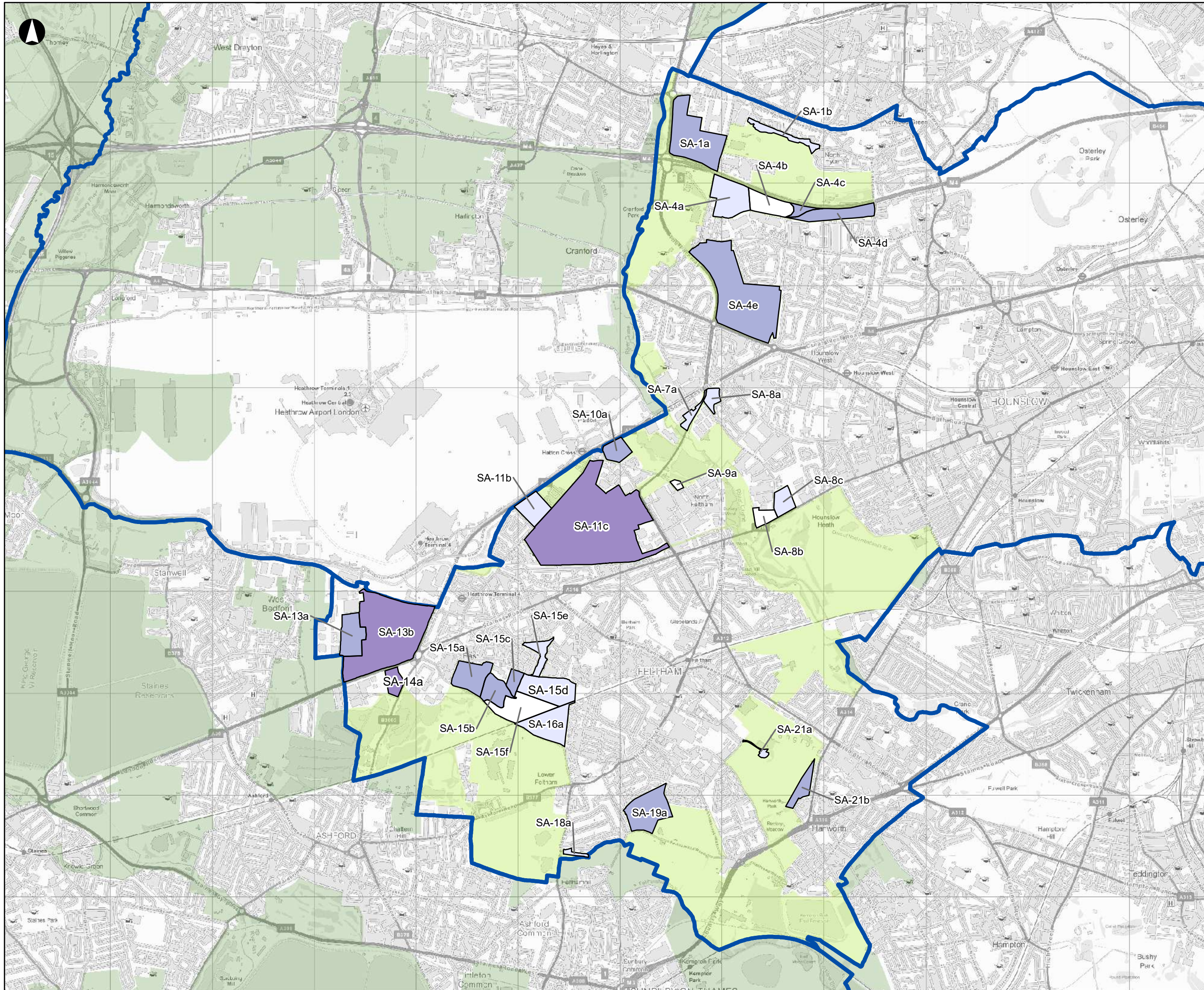
The findings of the Purpose 3 assessment are presented in Table 3.4 and Figure 3.4. No sub-areas were identified as performing strongly against Purpose 3 reflecting the very low level of openness across the assessed Green Belt.

**Table 3.4 Purpose 3 Summary of Scores**

Purpose 3 Score	Number of Sub-areas	Sub-areas
5	0	N/A
4	0	N/A
3	3	11c, 13b, 14a
2	11	1a, 4c, 4d, 4e, 10a, 13a, 15a, 15b, 15c, 19a, 21b
1	11	1b, 4a, 7a, 8a, 8b, 8c, 11b, 15d, 15e, 16a, 18a, 21a
0	4	4b, 9a, 15f

Fourteen of the sub-areas were identified as performing moderately against Purpose 3. These sub-areas have either a largely rural character or are Countryside In and Around Town (CIAT), characterised by a mix of both rural and urban uses. The sub-areas that scored moderately against Purpose 3 are dispersed throughout Hounslow and comprise areas of countryside subject to urbanising influences, or contain distinct areas with a contrasting, more urbanised character in terms of their functional land uses. A number of these sub-areas have a more rural character in terms of their functional land uses but have limited physical or visual connection to the countryside and a stronger relationship with adjacent urban areas.

The majority of the sub-areas in Hounslow were identified as performing weakly against Purpose 3 and have an urban character (52%). These sub-areas are dispersed across the Borough and comprise urban functional land uses and have little to no physical or perceptual connection to the wider countryside. In these sub-areas there is a much stronger connection to the urban area. Therefore, their role in protecting the openness of the countryside is very minimal.



**Legend**

- Borough Boundaries
- Hounslow Green Belt
- Neighbouring Green Belt

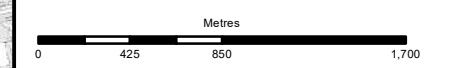
**Purpose 3 Scores**

- 0
- 1
- 2
- 3
- 4
- 5

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**Figure 3.4 Purpose 3 Scores**

Scale at A3 <b>1:35,000</b>	
Job No <b>263470-00</b>	Drawing Status <b>Final issue</b>
Drawing No <b>3.4</b>	Issue <b>P1</b>

### 3.2 Step 4b: Strategic Green Belt Assessment

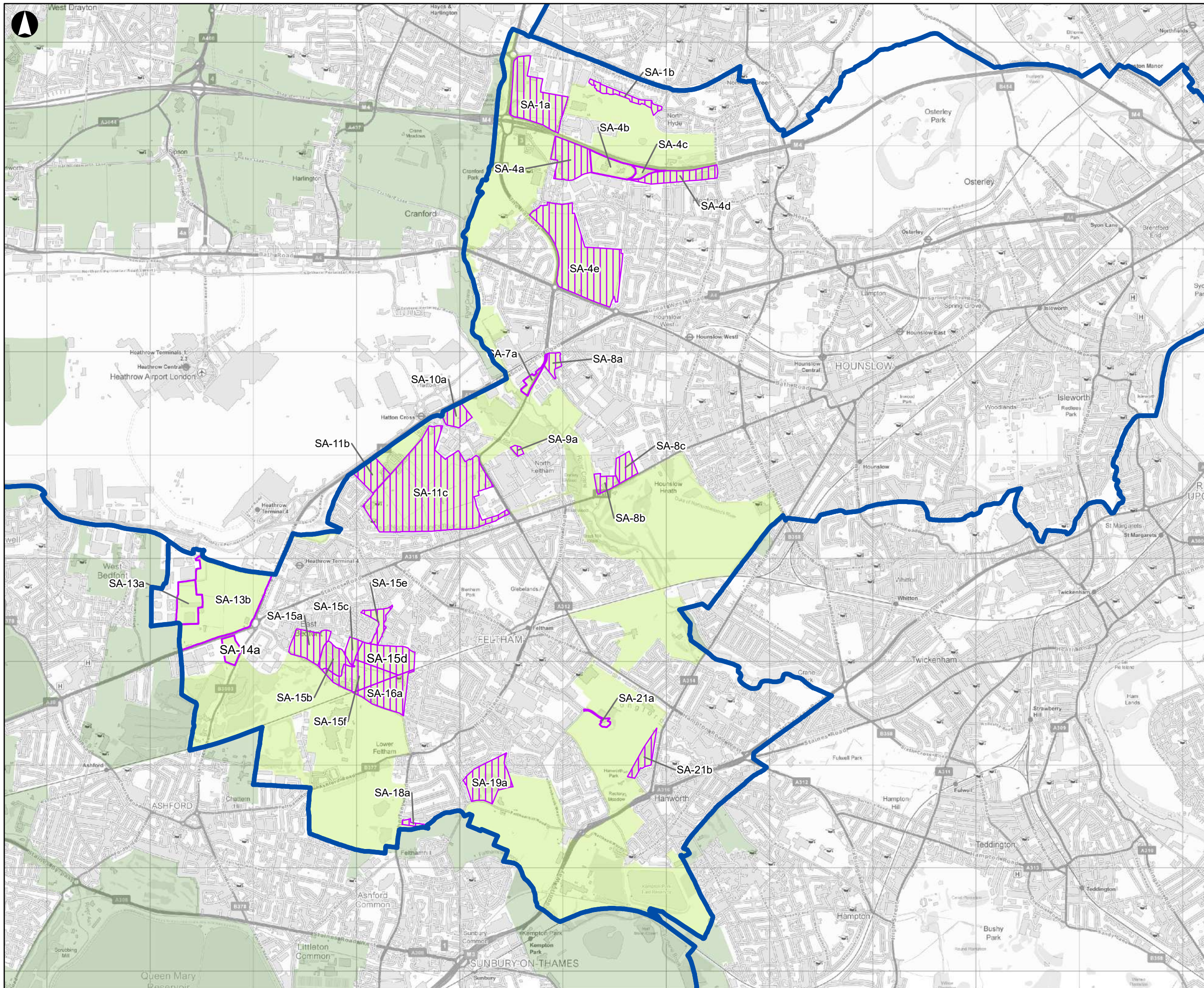
Reflecting the granular focus of the GBR Stage 2, additional qualitative assessment was undertaken to identify the role of sub-areas as part of the wider strategic Green Belt parcels within which they are located. A summary of the strategic assessment is provided in Table 3.5 and Figure 3.5. Seven of the sub-areas make an important contribution to the wider strategic Green Belt and 22 sub-areas make a less important contribution. The assessment did not identify any sub-areas which make a partly less important contribution.

**Table 3.5 Strategic Green Belt Assessment Summary**

Contribution to Wider Strategic Green Belt	No. Sub-areas	Sub-areas
<b>Important</b>	7	4b, 4c, 7a, 13a, 13b, 14a, 21a
<b>Less important</b>	22	1a, 1b, 4a, 4d, 4e, 8a, 8b, 8c, 9a, 10a, 11b, 11c, 15a, 15b, 15c, 15d, 15e, 15f, 16a, 18a, 19a, 21b
<b>Partly less important</b>	0	N/A

### 3.3 Step 4c: Boundary Considerations

The consideration of sub-area boundary strength identified where removal of a sub-area from the Green Belt could result in boundaries that were stronger, weaker, or comparable to existing. Where boundary weaknesses were identified, mitigation might be required, for example through strengthening existing partial boundary features or creation of a new boundary feature. The boundary consideration for each sub-area can be found in the assessment pro-formas in the Annex Report.

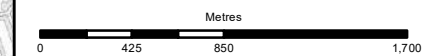


**Legend**

-  Borough Boundaries
  -  Hounslow Green Belt
  -  Neighbouring Green Belt
- Contribution to Wider Strategic Green Belt
-  Important
  -  Less Important

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**Figure 3.5 Strategic Green Belt  
Assessment Findings**

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Drawing Status  
**Final issue**

Drawing No  
**3.5**

Issue  
**P1**

### 3.4 Step 5: Categorisation and Recommendations

Each sub-area was categorised as to whether the sub-area (or combination of sub-areas, or part of sub-area) should be considered further. A summary of the categorisation is provided in Table 3.6 and Figure 3.6. Sub-areas categorised for further consideration have been recommended, in isolation and/or in combination/as part of a strategic cluster. No sub-areas have been partially recommended. It should be noted that the categories are not mutually exclusive, therefore it is not possible to total the number of sub-areas across the categories.

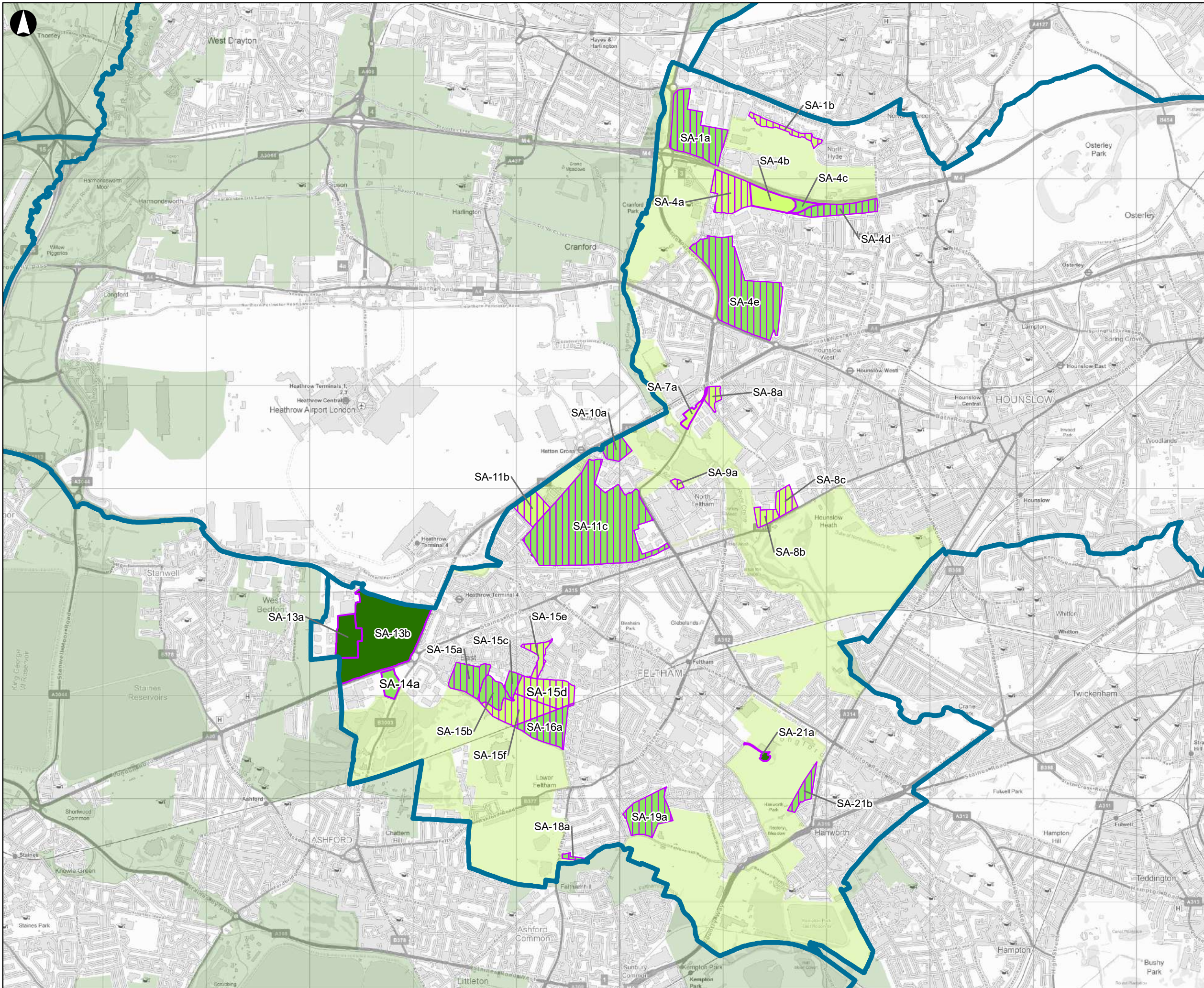
The overall recommendations are thus:

- 16 sub-areas have been recommended for further consideration in isolation ('RA's) – if removed from the Green Belt, these areas are unlikely to result in harm to the wider Green Belt;
- 3 sub-areas have been recommended for further consideration in combination ('RC's) - if removed from the Green Belt in combination, these areas are unlikely to result in harm to the wider Green Belt but one of the constituent sub-areas could not be removed in isolation without resulting in harm; and
- 10 sub-areas have been recommended for further consideration as a strategic cluster ('RS's) – larger swathes of Green Belt for consideration by the Council which would be least harmful to the wider Green Belt if removed, and where there are opportunities to ameliorate harm. However, six of the constituent sub-areas could not be removed in isolation without resulting in harm.

Each recommended sub-area, combination of sub-areas or strategic cluster has been assigned a unique reference number, illustrated in Figure 3.7.

**Table 3.6 Summary of Categorisation**

Overall Performance Against Purpose Assessment Criteria	Contribution to the Wider Strategic Green Belt	No. of Sub-areas	Recommendation					
			Not recommended	Isolation only	In isolation or in combination	In combination only	Isolation or as part of strategic cluster	Part of strategic cluster only
Strongly	Important	3	13a, 13b, 21a					
Strongly	Less important	0						
Moderately	Important	2	14a					4c
Moderately	Less important	12		1a, 4e, 10a, 16a, 18a, 19a, 21b		11c	4d, 15a	15b, 15c
Weakly	Important	2				7a		4b
Weakly	Less important	10		1b, 9a,	8a, 8b, 8c	11b	4a, 15e	15d, 15f

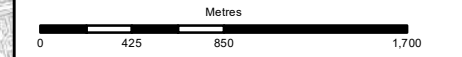


**Legend**

- Borough Boundaries
- Contribution to Wider Strategic Green Belt**
- Important
- Less Important
- Overall Performance**
- Strong
- Moderate
- Weak
- Hounslow Green Belt
- Neighbouring Green Belt

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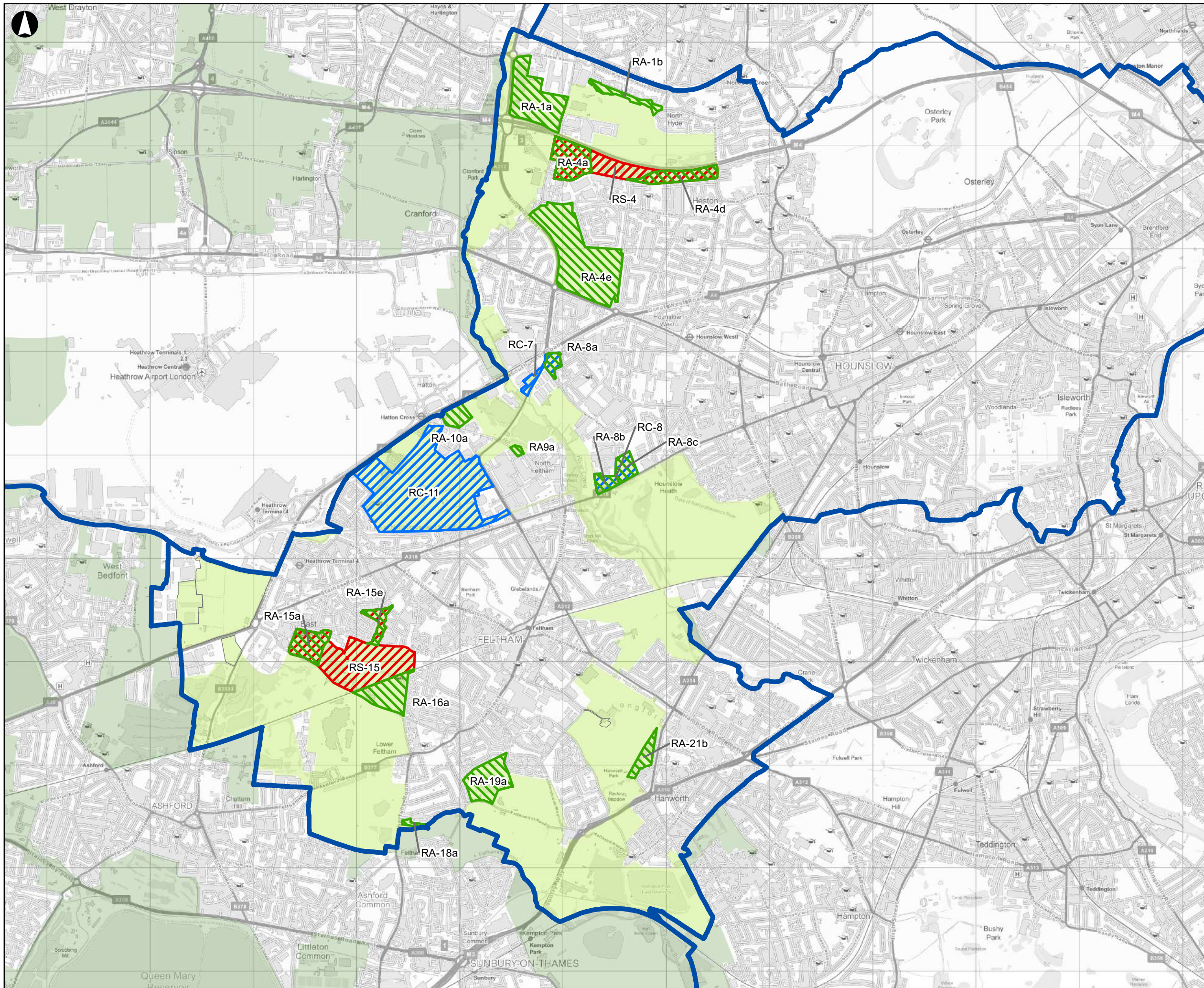
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**Figure 3.6**  
**Sub-area Categorisation**

Scale at A3  
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Job No <b>263470-00</b>	Drawing Status <b>Final issue</b>
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Drawing No <b>3.6</b>	Issue <b>P1</b>
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**Legend**

- Borough Boundaries
- Neighbouring Green Belt
- Hounslow Green Belt
- Sub-areas not recommended for further consideration
- Recommended for further consideration as a strategic cluster
- Recommended for further consideration in combination
- Recommended for further consideration in isolation

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**Figure 3.7 Recommended Areas and General Areas (GBA)**

Scale at A3  
**1:35,000**

Job No <b>263470-00</b>	Drawing Status <b>Final issue</b>
Drawing No <b>3.7</b>	Issue <b>P1</b>

## 4 MOL Key Findings

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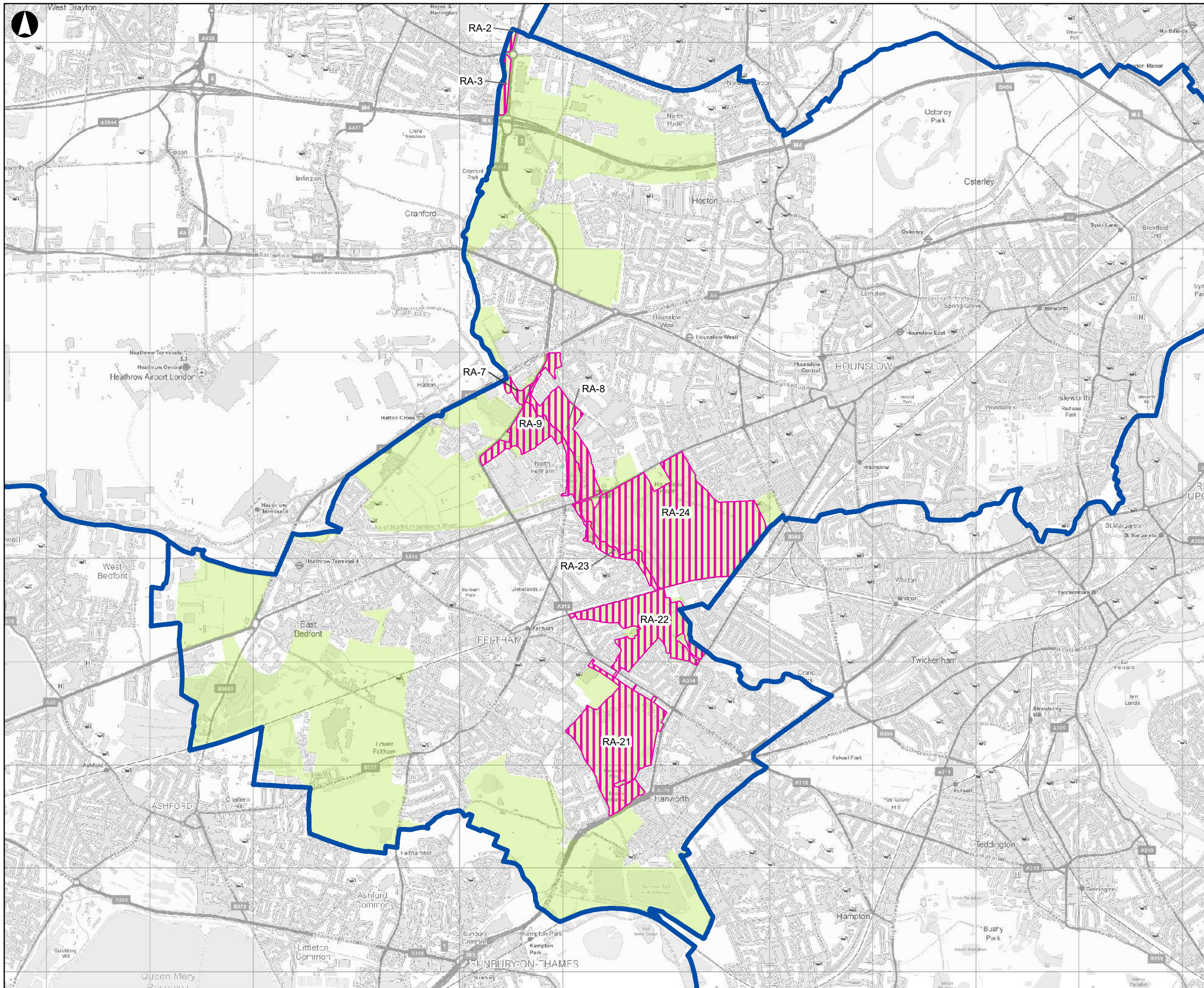
The section summarises the key findings from the assessment whether areas of Green Belt land should be re-designated as Metropolitan Open Land. Table 4.1 presents a summary of the overall scores of the areas against the criteria and methodology outlined in section 2.2 and Appendix B3. Full assessment profiles, scoring and recommendations based on the assessment are shown in the proformas in the Annex Report.

Figure 4.1 identifies the green belt areas recommended to be re-designated as MOL. In many cases, the Green Belt parcel has only been recommended for partial re-designation as MOL, due to some areas having been in part previously developed. It is therefore proposed that these developed parts of the general area or sub-areas are not re-designated as MOL.


**Table 4.1 General Area and Sub-Area MOL Assessment Summary**

The results in the table below should be read in context with the proforma, which provides understanding on the basis behind the scores given.

General Area or Sub-Area	Criteria A Score	Criteria B Score	Criteria C & D Score	Overall Score	Recommendation	Strategy
GA-2	4	2	2	4	Re-designation as MOL	Enhance, Restore
GA-3	4	3	3	4	Re-designation as MOL	Conserve, Enhance
GA-7	3	2	3	3	Partial re-designation as MOL	Conserve, Enhance
GA-8	3	2	2	3	Partial re-designation as MOL	Enhance
GA-9	4	3	3	4	Partial re-designation as MOL	Conserve, Enhance
SA-11a	1	1	1	1	No re-designation as MOL	Enhance
GA-21	4	3	4	4	Partial re-designation as MOL	Conserve, Enhance
GA-22	3	2	3	3	Partial re-designation as MOL	Conserve, Enhance, Restore
GA-23	4	3	3	4	Re-designation as MOL	Conserve, Enhance
GA-24	4	4	4	4	Partial re-designation as MOL	Conserve, Enhance

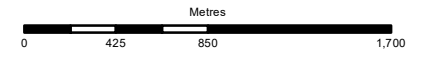


**Legend**

-  Borough Boundaries
-  Neighbouring Green Belt
-  Hounslow Green Belt
-  MOL Recommended Areas

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P1	17/05/19	JL	LM	KF
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Client  
**London Borough of Hounslow**

Job Title  
**Hounslow Green Belt Review - Stage 2**

**Figure 4.1**  
**MOL Recommended Areas**

Scale at A3  
**1:35,000**

Job No <b>263470-00</b>	Drawing Status <b>Final issue</b>
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Drawing No <b>4.1</b>	Issue <b>P1</b>
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## 5 Conclusions

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### 5.1 Green Belt Assessment

This Review builds on the Stage 1 Green Belt Review (GBR) published in April 2015 and the draft study (2017). The more refined and focussed assessment undertaken in this Review complements the conclusions formed in the GBR.

A total of 29 sub-areas for Green Belt assessment were identified as part of this Review. To ensure an exhaustive approach, these were based on General Areas identified for potential sub-division in the GBR Stage 1 as well as sites within the Green Belt emerging from the Council's own capacity work in the West of Borough area. Sites entirely or largely covered by major policy constraints were excluded from further assessment. The remaining sites were then adjusted to align with durable manmade and natural features, in order to define the sub-areas for assessment. Finally, sub-areas were reviewed and potentially amended to avoid any future anomalies in the Green Belt, such as islands.

The approach to assessing the sub-areas against the NPPF Purposes 1-3 (Step 4a) reflected the more focused, granular nature of the Review, whilst maintaining consistency with the overarching principles of the GBR methodology. Critically, the recommendations are underpinned by explicit consideration of the role and importance of smaller sub-areas in terms of the function of the wider Green Belt, taking into consideration the Parcel scores from the GBR (Step 4b) as well as wider considerations regarding the integrity of the Green Belt. For example, it considered whether the release of sub-areas might result in 'holes' in the Green Belt, which relate poorly to existing inset areas. In addition, Step 4b of the assessment considered the potential for cumulative harm to the Green Belt in instances where multiple sub-areas be released together.

Consideration was also given to potential impacts upon the relative strength of the Green Belt boundary and whether new boundaries would be defined 'clearly, using physical features that are readily recognisable and likely to be permanent' (in line with Para 139 of the NPPF) (Step 4c).

A total of nine sub-areas failed (Purpose 1 and 2) criteria a and therefore did not qualify for assessment against (Purpose 1 and 2) criteria b. The remaining 20 sub-areas which passed (Purpose 1 and 2) criteria a, met (Purpose 1 and 2) criteria b to a greater or lesser extent. All 29 sub-areas assessed through this Review had varying scores for (Purpose 1 and 2) criteria c and Purpose 3 assessments. More than half of the sub-areas (17 in total) assessed, perform moderately or strongly against one or more of the NPPF purposes.

Reflecting the smaller scale of many sub-areas in the context of the wider Green Belt, as well as the overall role, character and configuration of the Green Belt in Hounslow as assessed in the GBR, 22 sub-areas are considered to make a less important contribution to the wider strategic Green Belt. The consideration of the role and importance of sub-areas in terms of the function of the wider Green Belt, are reflected in Review's recommendations.

The overall recommendations are thus<sup>12</sup>:

- 16 areas are recommended for further consideration in isolation ('RA's) – if removed from the Green Belt, these areas are unlikely to harm the performance of the wider Green Belt;
- 3 areas are recommended for further consideration in combination ('RC's) - if removed from the Green Belt in combination, these areas are unlikely to harm the performance of the wider Green Belt, but one of the constituent sub-areas could not be removed in isolation without resulting in harm;
- 10 areas are recommended for further consideration as a strategic cluster ('RS's) – larger swathes of Green Belt for consideration by the Council which are unlikely to harm the performance of the wider Green Belt if removed, and where there are opportunities to ameliorate harm. However, six of the constituent sub-areas could not be removed in isolation without resulting in harm.

## 5.2 MOL Assessment

With regard to the MOL assessment, the field survey confirmed that none of the Green Belt parcels assessed (Figure 4.1) performed strongly (level 5) and that six of the parcels performed at level 4 e.g. moderate-strong in relation to MOL criteria. Of the remainder, three scored moderate (level 3) and one weakly against the MOL criteria (level 1).

Table 4.1. provides a summary of these scores, however it should be noted that the overall scores are not always clear-cut, and there is some variation within the parcels. These variations are captured in the narrative in the proformas contained in the Annex Report. It will be seen from these that in some instances, parts of the Green Belt parcels have been in part previously developed and it is therefore proposed that such areas are not re-designated as MOL (Figure 4.2). Many of the sites in the intermediate scoring categories (levels 3-4) demonstrate notable potential for greenspace enhancement.

The overall recommendations are thus:

- Three areas are recommended for further consideration as MOL;
- Six areas are partially recommended for further consideration as MOL; and
- One area is not recommended for MOL.

These recommendations are captured in the proformas, for the council to review and consider against other projects and priorities during the life of the Local Plan.

## 5.3 Potential Amendments to the Green Belt

The recommendations from the Stage 1 GBR and Stage 2 GBR and MOL assessment should all be considered by the Council in the decision-making

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<sup>12</sup> It should be noted that the categories are not mutually exclusive, therefore it is not possible to total the number of sub-areas across the categories.

process for amending Green Belt boundaries. A summary of the recommendations can be found at Table 5.1, with a mapped representation provided at Figure 5.1. The following should be taken into account:

- In instances where recommendations from the Stage 1 GBR and Stage 2 GBR overlap (for example, for the release of both the wider General Area and more refined sub-area(s)), it is suggested that the Council considers which scale of release is most appropriate as part of the wider spatial strategy. The refined assessment at Stage 2 does not supersede the results of the Stage 1 assessment.
- In instances where recommendations from the Stage 1 and Stage 2 GBRs overlap with MOL recommendations the Council should consider the following:
  - Green Belt and MOL land have equal status. As such, in cases where MOL areas are recommended, any previously enclosed or connecting areas of land to remain in the Green Belt would not be treated as future anomalies or ‘islands’.
  - Where a Green Belt release has been recommended within a wider recommended MOL area, the Council may wish to consider amending the boundaries of the recommended MOL area, should the intention be to consider the recommended Green Belt release land for future development.

With regards to the Green Belt assessment, aside from excluding sub-areas which are wholly or predominantly affected by absolute constraints, it should also be noted that all recommendations have been made based on the performance of sub-areas against NPPF purposes, and their performance in the context of the wider Green Belt. Suitability in terms of sustainability, deliverability, infrastructure and wider planning considerations has not been taken into account in the recommendations. It will fall to LBH to further assess the sustainability and delivery of areas of land assessed through the GBR Stage 2 assessment where appropriate, as part of the wider plan-making process.

It should be noted that the relative strength of boundaries was not a determining factor in the final recommendations given it may be possible in certain circumstances to secure mitigation to strengthen currently weak boundaries or to provide new boundaries where gaps exist (e.g. through a site allocation policy). While it is noted where this might be required in the final recommendations, the decision on the appropriateness of strengthening existing, or creating new boundaries, will be for the Council to make, taking into account how such mitigation might be secured.

These recommendations will ultimately need to be balanced against the findings of other technical work and the Council’s preferred spatial strategy as part of the wider site selection process. Ensuring maximum protection for the Green Belt, in line with national policy, continues to be a core planning principle in the formulation of Local Plan policy. The recommendations set out in this Review will therefore not automatically lead to the release of land from the Green Belt, and further decision making by the Council will determine which areas, if any, might be released from the Green Belt. Should further work demonstrate that sites

are not sustainable or deliverable, the Council may recommend that the parcels should be retained within the Green Belt. This Review will ultimately form part of a suite of evidence, which will be used to inform the plan-making process.

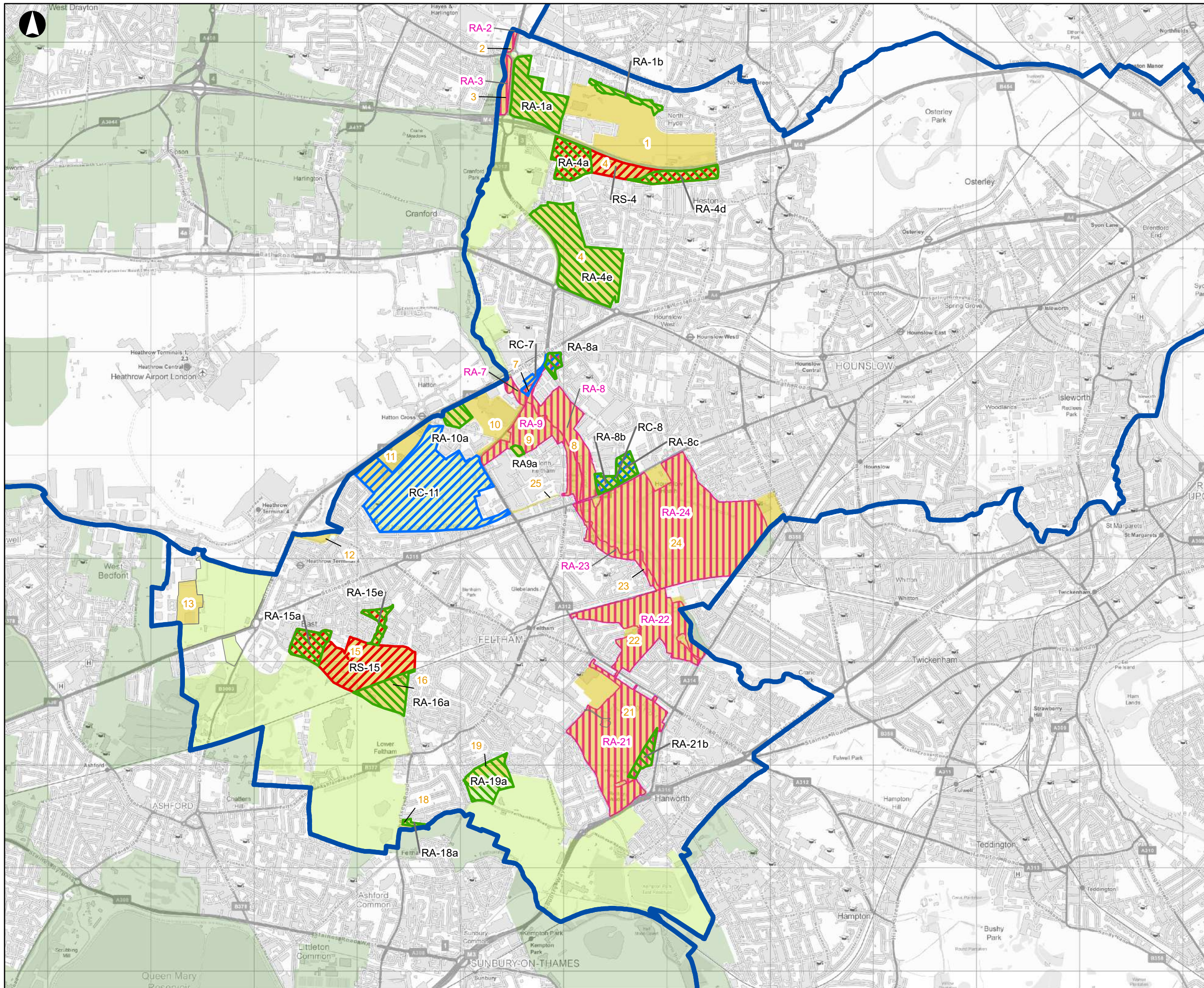
The Council will also need to carefully consider whether, in accordance with the NPPF, there are any exceptional circumstances that justify the Green Belt boundary in Hounslow to be altered through the Local Plan review. At that time, the Council will need to consider the Green Belt boundary, having regard to its intended permanence in the long term, so that any proposed boundaries are capable of enduring beyond the Plan period.

**Table 5.1 GBR Stage 1 and 2 Conclusions**

General Area / Sub-Areas	Green Belt Conclusions	MOL Conclusions
<b>GA1</b>	Consider for release	n/a
<b>SA-1a</b>	Consider for release as RA-1a	n/a
<b>SA-1b</b>	Consider for release as RA-1b	n/a
<b>GA2</b>	Consider for release	Consider for MOL as RA-2
<b>GA3</b>	Consider for release	Consider for MOL as RA-3
<b>GA4</b>	Part Green Belt, part consider for release	n/a
<b>SA-4a</b>	Consider for release as RA-4a / RS-4	n/a
<b>SA-4b</b>	Consider for release as RS-4	n/a
<b>SA-4c</b>	Consider for release as RS-4	n/a
<b>SA-4d</b>	Consider for release as RA-4d / RS-4	n/a
<b>SA-4e</b>	Consider for release as RA-4e	n/a
<b>GA5</b>	Retain as Green Belt	n/a
<b>GA6</b>	Retain as Green Belt	n/a
<b>GA7</b>	Consider for release / partial re-designate as MOL	Consider for partial re-designation as MOL as RA-7
<b>SA-7a</b>	Consider for release as RA-7/RC-7	n/a
<b>GA8</b>	Consider for release	Consider for partial re-designation as MOL as RA-8
<b>SA-8a</b>	Consider for release as RA-8a / RC-7	n/a
<b>SA-8b</b>	Consider for release as RA-8b / RC-8	n/a
<b>SA-8c</b>	Consider for release as RA-8c/ RC-8	n/a
<b>GA9</b>	Consider for release	Consider for partial re-designation as MOL as RA-9
<b>SA-9a</b>	Consider for release as RA-9a	n/a

General Area / Sub-Areas	Green Belt Conclusions	MOL Conclusions
<b>GA10</b>	Consider for release	n/a
<b>SA-10a</b>	Consider for release as RA-10a	n/a
<b>GA11</b>	Part retain, part consider in Stage 2	n/a
<b>SA-11a</b>	n/a	Retain as Green Belt
<b>SA-11b</b>	Consider for release as RC-11	n/a
<b>SA-11c</b>	Consider for release as RC-11	n/a
<b>GA12</b>	Consider for release	n/a
<b>GA13</b>	Part retain, part consider in Stage 2	n/a
<b>SA-13a</b>	Retain as Green Belt	n/a
<b>SA-13b</b>	Retain as Green Belt	n/a
<b>GA14</b>	Retain as Green Belt	n/a
<b>SA-14a</b>	Retain as Green Belt	n/a
<b>GA15</b>	Part retain, part consider in Stage 2	n/a
<b>SA-15a</b>	Consider for release as RA-15a / RS-15	n/a
<b>SA-15b</b>	Consider for release as RS-15	n/a
<b>SA-15c</b>	Consider for release as RS-15	n/a
<b>SA-15d</b>	Consider for release as RS-15	n/a
<b>SA-15e</b>	Consider for release as RA-15e / RS-15	n/a
<b>SA-15f</b>	Consider for release as RS-15	n/a
<b>GA16</b>	Part retain, part consider in Stage 2	n/a
<b>SA-16a</b>	Consider for release as RA-16a	n/a
<b>GA17</b>	Retain as Green Belt	n/a
<b>GA18</b>	Consider for release	n/a
<b>SA-18a</b>	Consider for release	n/a

General Area / Sub-Areas	Green Belt Conclusions	MOL Conclusions
<b>GA19</b>	Part Green Belt, part consider for release	n/a
<b>SA-19a</b>	Consider for release as RA-19a	n/a
<b>GA20</b>	Retain as Green Belt	n/a
<b>GA21</b>	Weakly performing, consider further for release	Consider for partial re-designation as MOL as RA-21
<b>SA-21a</b>	Green Belt	n/a
<b>SA-21b</b>	Consider for release as RA-21b	n/a
<b>GA22</b>	Consider for release	Consider for partial re-designation as MOL as RA-22
<b>GA23</b>	Consider for release	Consider for re-designation as MOL as RA-23
<b>GA24</b>	Consider for release	Consider for partial re-designation as MOL as RA-24
<b>GA25</b>	Consider for release	n/a
<b>A</b>	Exclude from Green Belt	n/a
<b>B</b>	Stage 1 GBR identified potential to be Green Belt, however, the site is under development. Exclude from Green Belt	n/a
<b>C</b>	Stage 1 GBR identified potential to be Green Belt. However, since the Stage 2 assessment has recommended the release of SA-15a, SA-15b, SA-15c, SA-15d, SA-15e and SA-15f, the designation of parcel C would not be appropriate as it would result in a Green Belt 'island'. Should the Council decide that these sub-areas are retained in the Green Belt, further consideration should be given to the contribution parcel C makes to the purposes of the Green Belt and whether its designation is warranted.	n/a

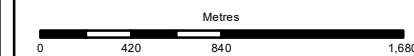


**Legend**

- Borough Boundaries
- Hounslow Green Belt
- Neighbouring Green Belt
- Sub-areas not recommended for further consideration
- Recommended for further consideration as a strategic cluster
- Recommended for further consideration in combination
- Recommended for further consideration in isolation
- MOL Recommended
- Stage 1 GBR weakly performing General Areas

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**Hounslow Green Belt Review - Stage 2**

**Figure 5.1 - Consolidated Stage 1 and 2 GBR Recommendations**

Scale at A3

**1:35,000**

Job No  
**263470-00**

Drawing Status  
**Final Issue**

Drawing No  
**5.1**

Issue  
**P1**

# Appendix A

## Context

## A1 Green Belt Context

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The GBR set out the relevant national and local policy framework for undertaking such an assessment, as well as relevant guidance and good practice identified elsewhere. This has not been repeated here; however, where this is current, it will continue to shape the methodology for this GBR Stage 2 Review. This section therefore provides an update on policy, guidance and experience elsewhere since the initial assessment was undertaken.

### A1.1 Policy and Guidance

#### A1.1.1 National Planning Policy Framework

Since the GBR, changes have been made to national planning policy. On the 24 July 2018, the Government published the revision of the National Planning Policy Framework (NPPF). The policies in the 2012 NPPF will apply for the purpose of examining plans, where those plans are submitted on or before the 24 January 2019. Since the West of Borough Local Plan will not have been submitted for Independent Examination by this point in time, the 2018 NPPF is the relevant policy document and therefore any changes to Green Belt policy will need to be considered in developing the methodology for the GBR Stage 2.

The 2018 NPPF states in paragraph 3, that it should be read as a whole, and general references to planning policies should be applied in a way which is appropriate to the type of plan being produced. This reflects that chapter 3 on plan-making introduces the concept of strategic and non-strategic policies, which may be set out in different types of plan but together comprise the development plan for the area.

It should be noted that most policies relating to Green Belt remain unchanged, i.e.: the overarching aim, the five purposes, the intended permanence of the Green Belt, the need to take into account sustainable patterns of development, alterations only to be undertaken in exceptional circumstances and the need for positive planning in the use of Green Belt land. The changes included in the 2018 NPPF provide further clarity on the factors which local planning authorities must take into account when proposing release of land from the Green Belt. This includes ensuring the redevelopment of brownfield land is maximised and density of development is optimised before amendments to Green Belt boundaries are considered. The need to demonstrate how the impact of removing land from the Green Belt will be compensated is also introduced.

#### A1.1.2 Planning Practice Guidance

The national Planning Practice Guidance (PPG) provides guidance on the requirements of the planning system<sup>13</sup>. The current PPG reiterates the importance

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<sup>13</sup> It should be noted that Planning Practice Guidance has yet to be updated, to reflect the changes from the 2018 NPPF.

of the Green Belt and acknowledges that Green Belts may restrain the ability to meet housing need. The PPG provides no guidance on how to conduct a Green Belt review per se.

### A1.1.3 London Plan

The GBR provided a summary of the relevant Green Belt policies in the adopted London Plan (2011). Since the GBR was prepared, the Mayor produced a further update to the London Plan in 2016. No amendments to Green Belt policies were included in the consolidated plan.

The Mayor is undertaking a review of the London Plan. In December 2017, he published the draft London Plan for consultation. This includes Policy G2, which is broadly consistent with the existing adopted London Plan policy:

“A) The Green Belt should be protected from inappropriate development:

- 1) development proposals that would harm the Green Belt should be refused
- 2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.

B) The extension of the Green Belt will be supported, where appropriate. Its de-designation will not.”

The explanatory text, which supports this draft policy is set out at paragraphs 8.2.1 and 8.2.2. This includes the following text: “The Mayor strongly supports the continued protection of London’s Green Belt. The NPPF<sup>14</sup> provides a clear direction for the management of development within the Green Belt and sets out the processes and considerations for defining Green Belt boundaries.”

It should be noted that the draft London Plan was published before the 2018 NPPF and therefore does not take into account the updates made to this policy area. The Secretary of State for Housing, Communities and Local Government confirmed in his letter dated 27 July 2018 that the London Plan would be examined against the 2012 NPPF. This letter also stated that it is crucial that the Mayor brings forward a revised London Plan that has regard to new national policies at the earliest opportunity.

## A1.2 Legal Precedents

This section provides a summary of relevant recent legal precedents, (in addition to those already explored in the GBR), established through Planning Appeals and Independent Examination of Local Plans, which will help to inform the approach taken to the Green Belt methodology. It should be noted, however, that all of these precedents were made within the context of the 2012 NPPF. It will remain to be seen whether any of these precedents will be challenged as the 2018 NPPF is applied to planning decisions and plan making.

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<sup>14</sup> NPPF (2012) paras 79 – 92.

## A1.3 Planning Appeals

The Turner judgement (2016) (and other case law) has highlighted important considerations surrounding the interpretation of ‘openness of the Green Belt’ and is therefore relevant to the assessment of land against the Green Belt purposes (in particular, Purpose 3). In his judgment, LJ Sales noted the following:

‘There is an important visual dimension to checking “the unrestricted sprawl of large built-up areas” and the merging of neighbouring towns, as indeed the name “Green Belt” itself implies. Greenness is a visual quality: part of the idea of the Green Belt is that the eye and the spirit should be relieved from the prospect of unrelenting urban sprawl. Openness of aspect is a characteristic quality of the countryside, and “safeguarding the countryside from encroachment” includes preservation of that quality of openness. The preservation of “the setting ... of historic towns” obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields<sup>15</sup>.’

Appeal cases in Three Rivers<sup>16</sup> and Cheshire West and Chester<sup>17</sup> further highlight the need to carefully consider ‘openness’. In the former case, the Inspector concluded the proposal for three dwellings should be allowed as it constituted limited infill development in a village and as appropriate Green Belt development, the impact of the proposal on openness did not need to be assessed; however, that being said, the Inspector concluded that, regardless, any possible impact on openness would be offset by the removal of an existing structure with a similar footprint to the proposed development.

‘I therefore conclude that the proposal would constitute limited infill within a village and would therefore not be inappropriate development within the Green Belt. Accordingly, there is no need to examine if very special circumstances exist to outweigh any harm arising from inappropriateness. ...

In view of my finding that the proposal is not inappropriate development, the impact on openness does not fall to be formally considered, but the impact of proposal on the openness of the Green Belt would be offset to a large degree by the removal of the barn that has a similar footprint to the proposed houses.’

The case in Cheshire concerned plans for a new home to be developed on previously developed Green Belt land. The site concerned was a builder’s yard on the edge of washed-over village. The Inspector concluded that it could not be considered infill development, given that it was widely spaced from neighbouring houses and has frontages onto different roads. Further the development would urbanise the site and its surroundings, thereby diminishing the openness of Green Belt. The appeal was accordingly dismissed.

‘Indeed, in line with the 2016 Turner v Secretary of State and East Dorset Council judgement the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Such an approach would be far too simplistic and ignore the wider aspects of openness which goes beyond the physical effect of buildings or structures. Factors relevant include

<sup>15</sup> Turner v Secretary of State CLG and East Dorset Council (2016) *EWHC 2728 (Admin)*

<sup>16</sup> The Planning Inspectorate (2018) *Appeal Ref: APP / P1940/W/17/3183388* – Clovercourt Ltd v Three Rivers District Council

<sup>17</sup> The Planning Inspectorate (2018) *Appeal Ref: APP/ A0665/ W/ 17/ 3190601* – Clegg v Cheshire West & Chester Council

how built up the Green Belt is now and how built up would it be after development has taken place. Consequently, although it may be accepted that the proposal to redevelop a brownfield site may result in a reduced volume and footprint compared to the buildings and structures currently in place, there are wider factors that must be taken into account in defining the effect of the proposal on openness.

In assessing the matter of openness there are a number of ways of determining whether there would be encroachment into the Green Belt. The effect of development as encroachment on the countryside may be in the form of loss of openness or intrusion. The Framework identifies that openness is an essential characteristic of the Green Belt.’

The Secretary of State approved plans to build a replacement secondary school and new homes on Green Belt land east of Guildford, after ruling that ‘very special circumstances’ had been demonstrated<sup>18</sup>. He agreed with the Inspector that the scheme represented a significant development in the Green Belt which would, inevitably and significantly reduce its openness and would erode the open context of the village. Noting the substantial harm to the Green Belt, he ruled that the provision of new housing and a new school carried greater weight.

The Inspector’s note<sup>19</sup> for this appeal highlighted some key considerations in relation to Green Belt, which are relevant to this assessment:

- The two essential attributes of the Green Belt are its permanence and openness, in line with NPPF (paragraph 133).
- The key element to assess is the effect that a development has on the openness of the Green Belt.
- The ‘concept of ‘openness’ is generally considered to be land being free from built development.’
- Although openness should be assessed on an individual site / area basis, the cumulative impact on the Green Belt of development on adjacent sites / areas should be considered.

## A1.4 Independent Examination of Local Plans

Issues relating to Green Belt Assessment highlighted at recent Independent Examinations of Local Plans, include:

- Welwyn Hatfield (2017)<sup>20</sup>: The Inspector stressed the need to ensure sufficient granularity in identifying land parcels in a Stage 2 Assessment; the importance of assessing openness as opposed to landscape; the need for assessments to consider local circumstances when determining essential areas to retain and preserving settlement gaps; queried whether local considerations, if used,

<sup>18</sup> Ministry of Housing, Communities and Local Government, Secretary of State (2018) *Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd and The Howard Partnership Trust*

<sup>19</sup> The Planning Inspectorate (2017) *Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust, APP/ Y3615/W/16/3151098*

<sup>20</sup> Mel Middleton, Inspector (December 2017) *Welwyn Hatfield Local Plan Examination Green Belt Review*

should be accorded the same weight as the NPPF Purposes; and advocated that it is pointless to carry out Green Belt Assessment for sites affected by major policy constraints.

[The Local Plan development strategy is not sound], ‘in part because there was insufficient justification for the failure to identify sufficient developable sites within the Green Belt. This is largely because the phase 1 Green Belt Review was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas. .... Additionally, the phase 2 Green Belt Review, which did look at a finer grain of sites, does not appear to have examined all of the potential development sites adjacent to the urban areas.

Furthermore that study, which combined a more refined examination, of the contribution that sites made to Green Belt purposes, with an overall examination of development considerations, appears to have incorporated an examination of landscape character into the consideration of openness. Openness considerations in a Green Belt context should only be concerned about the absence of built development and other dominant urban influences. They should not be concerned about the character of the landscape.

.....

There must be a limit beyond which the development of undeveloped land between settlements, be they neighbouring towns or nearby smaller settlements, should not proceed. Exactly what that is in terms of distance is debatable and it could well be different in the context of the merging of neighbouring towns to the context of maintaining the settlement pattern. I note that the Council has referred to a kilometre, whereas other studies have used a mile and even five kilometres in the context of neighbouring towns. What is significant however is perception and a kilometre gap with limited development in a landscape of rolling topography, where the settlements are not visible one from the other, is probably more valuable than five kilometres in flat country with more sporadic urban development in between and such that the settlements are clearly visible one from the other.

.....

There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites however they are defined’

- Redbridge (2018)<sup>21</sup>: The Inspector emphasised that a Green Belt Review should focus on assessing the Green Belt against the NPPF purposes. Where no historic towns exist, it is reasonable to exclude Purpose 4 from an assessment. Further, although Purpose 5 is not particularly useful for evaluating sites, the rationale expressed for leaving out this purpose must be robust.

‘The assistance the Green Belt gives to urban regeneration is assumed to be nil because all brownfield sites with reasonable prospects of development have been identified. That

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<sup>21</sup> David Smith, Inspector, (24 January 2018), *Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030*

view is flawed as a matter of principle because the aims of the Green Belt are long term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites.’

## A1.5 Experience Elsewhere

Table A1 provides a summary of Stage 2 Green Belt reviews undertaken by authorities neighbouring the London Borough of Hounslow, and a brief overview of the methodology taken. Table A2 summarises the approach taken in neighbouring authorities and elsewhere to identify sub-areas for Stage 2 Green Belt reviews. Key points to note:

- Consistency of approach between Stage 1 and Stage 2 Green Belt reviews, in terms of assessment criteria.
- Variety of approaches taken to identify sub-areas for Stage 2 reviews.

It should be noted that the timescales for undertaking some of the Green Belt reviews pre-date the NPPF, whilst others have not been subject to Independent Examination. In identifying good practice from the approaches adopted by neighbouring authorities, these factors should be taken into account to ensure that the methodology adopted is sound and reflects the latest requirements of the 2018 NPPF.

**Table A1 Summary of Neighbouring Authorities Green Belt Review Work**

Local Authority	Study	Status	Summary of Approach
Spelthorne Borough Council	Green Belt Review Part 2	Not yet published	The Study will assess Local Areas for Potential Sub-Division, identified in the Green Belt Assessment, and identify additional 'sub-areas' using defensible boundary features, on the basis of flexible buffers around settlements, with an additional filter applied to remove whole areas subject to major policy and other constraints. Sub-areas proceeding will be assessed against the purposes of the NPPF, the role they play in relation to the wider strategic Green Belt, and the strength and regularity of proposed boundary features. The assessment criteria are broadly the same as those used for the Green Belt Assessment. Recommendations will then be made identifying sub-areas that could be considered for potential release. [Study being conducted by Arup]
London Borough of Ealing	The Edge of Settlement Analysis Part 2: Green Belt Purpose Assessment	Published in 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. Limited recommendations made, the most significant of which proposed reclassifying one area of Green Belt as Metropolitan Open Land, resulting in a de-designation of 21.7 ha.
London Borough of Hillingdon	Green Belt Assessment Update	Published in 2013	The Study provided an update to the Green Belt review undertaken in 2006, taking account of changes in national planning policy and the additional sites that have been submitted as part of the Local Plan Part 2. The review assessed all representations relating to a proposed change in the Green Belt boundary, received by the Council since the adoption of the Unitary Development Plan in 1998. These were assessed against the purposes defined in the NPPF.
London Borough of Richmond upon Thames	n/a	n/a	n/a

**Table A2 Review of Green Belt Methodologies – Sub-Area Identification**

Local Authority	Date	Approach taken to identifying Sub-Areas
<b>Welwyn Hatfield Borough Council</b>	2014/ 2016	<p>The Welwyn Hatfield Part 2 Study assessed a range of Green Belt sites, including:</p> <ul style="list-style-type: none"> <li>‘Strategic sub-areas’ (as identified in the Part 1 Study)</li> <li>‘Small scale sub-areas’ and areas for ‘Boundary adjustment’ recommended for further assessment in the Part 1 Study</li> </ul> <p>Sites identified in the Strategic Housing Land Availability Assessment            Sites identified in the Gypsy and Traveller Land Availability Assessment</p> <p>This approach was however criticised during the Local Plan Examination. Although the Review assessed finer grain sites, it was not considered to fully examine all of the potential development sites adjacent to urban areas.</p> <p>In 2016 a further ten Green Belt sites were assessed using the same methodology as 2014, following their identification in the Housing and Employment Land Availability Assessment as sites with a potential to contribute to a sustainable pattern of development.</p>
<b>Runnymede Borough Council</b>	2017	<p>RBC’s spatial strategy is that urban and brownfield sites should be prioritised for development. In line with this spatial strategy, Runnymede Borough Council Green Belt Review Part 2 used indicative fixed buffers around each identified settlement, to indicate the likely maximum extent of sustainable development. In determining an appropriate width of buffer, the Council carried out a literature review of broadly comparable studies elsewhere. The findings from the literature review, along with the conclusions of the centre hierarchy paper, and considerations on the size of the Borough and spacing of settlements, led to a range of buffer widths being tested.</p> <p>Overall, it was decided that a 400m buffer would provide a reasonable zone for the town centres and key service centres. The 250m buffer was considered a reasonable buffer for the local service centres and their surrounding urban areas.</p> <p>These buffers indicated the likely maximum extent of sustainable development, and vary according to the position of the settlement in the centre hierarchy. It was considered that assessing wider buffers would to some extent cause duplication with previous work undertaken, and might encourage unsustainable forms of development away from settlements.</p> <p>The assessment covered the full extent of the buffer, to ensure that sub-areas that were not directly adjacent to the settlement, but still functionally related, were still considered as part of the assessment. Promoted sites located outside of the buffers were excluded from the assessment. The buffers helped to identify ‘in-between’ sites that would logically form sub-areas for assessment.</p>
<b>Cheshire East Council</b>	2015	<p>The Green Belt Parcel Assessment provided further detailed assessment on smaller parcels of land:</p> <ul style="list-style-type: none"> <li>Around settlements either partially or fully inset by the Green Belt, within General Areas identified in the Stage 1 Assessment as providing a ‘contribution’ or ‘no contribution’ to the Green Belt (excluding General Areas that were identified as providing a ‘major’ or ‘significant’ contribution); and</li> <li>Around all settlements identified as Principle Towns, Key Service Centres and Local Service Centres</li> </ul> <p>Sites included in the Local Plan Strategy (Submission Version), not covered by the above criteria were also assessed but reported separately.</p>

<b>Cheshire West and Chester Council</b>	2013	The Stage 2 Green Belt Review re-assessed all of the ten Areas reviewed as part of Stage 1. This formed the starting point to identify resultant land parcels within the 10 Areas, which could potential be released from the Green Belt.
<b>Royal Borough of Windsor and Maidenhead</b>	2016	The Edge of Settlement Analysis: Green Belt Purpose Assessment considered all land on the edge of those settlements which are themselves excluded from the Green Belt. To ensure a comprehensive assessment all areas of land were considered regardless of whether it had been promoted by the landowner as being available for development.
<b>Aylesbury Vale District Council</b>	2016	<p>The Aylesbury Vale Green Belt Assessment Part 2 assessed the ‘general areas’ and ‘sub-parcel areas’ that had been identified in Part 1 of the assessment as warranting further consideration for potential removal from the Green Belt, as well as other options the Council were considering for land within the Green Belt.</p> <p>The areas for further consideration included the following:</p> <p>General Areas, which scored weakly overall against the NPPF purposes</p> <p>Whole General Areas or clusters of General Areas, which performed medium or strongly scoring against the NPPF purposes but have particular characteristics or synergies with neighbouring weaker General Areas</p> <p>Medium or strongly scoring General Areas where there is clear scope for sub-division to identify weakly performing ‘sub-areas’, including the presence of boundary features which have the potential to be permanent and recognisable</p> <p>Non-Green Belt General Areas, which could be considered for inclusion in the Green Belt.</p>

## A2 MOL Context

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This section initially establishes the planning policy context for Metropolitan Open Land (MOL) and reviews experience elsewhere with regards to ‘swapping’ Green Belt to MOL.

### A2.1 Planning Policy

The concept of MOL was first defined in the 1969 draft London Development Plan, which proposed a protective designation for larger areas of open land within the urban area. Upon approval of the Plan in 1976 by the Secretary of State, the policy was adopted as “land within the built-up area” which needs “to be safeguarded just as much as the Green Belt”. Since the concept was first introduced, it has remained the province of London’s metropolitan planning policy only. Thus the 2018 NPPF (and its predecessor) contain no references to MOL.

### A2.2 London Plan

#### Adopted London Plan

Policy 7.17 of the London Plan consolidated with alterations since 2011 (2016) establishes the policy context for MOL. At the strategic level, support is expressed for the current extent of MOL, its extension in appropriate circumstances and protection against development, in particular, that which would have an adverse impact on its openness. The policy states that any alterations to MOL boundaries should be undertaken as part of the LDF process; and further that to designate land as MOL it is necessary to demonstrate that the land meets at least one of the following criteria:

- a) ‘It contributes to the physical structure of London by being clearly distinguishable from the built-up area
- b) It includes open area facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve the whole, or significant parts, of London
- c) It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
- d) It forms part of a green chain, or a link in the network of green infrastructure and meets one of the above criteria.’

The supporting text to Policy 7.17 states that “paragraphs 79-92 of the [2012] NPPF on Green Belts applies equally to Metropolitan Open Land (MOL)”.<sup>22</sup> This was tested in the appeal case of R (on the application of Lensbury Ltd) v

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<sup>22</sup> It is assumed that the paragraphs in the new NPPF (2018) relating to Green Belt, paras 133-147, continue to apply to MOL. Further detail on these paragraphs is set out in section 2.2.1 of this review.

Richmond-Upon-Thames London Borough Council<sup>23</sup>, which confirmed in legal terms that equal protection should be afforded to Green Belt and MOL designations in determining planning applications.

The supporting text provides further detail on amendments to MOL boundaries, highlighting in particular that ‘green chains’ should be designated MOL due to their London-wide importance, and stating that the loss of MOL for the creation of new open space elsewhere will not be supported.

### **Emerging London Plan**

The draft London Plan (2018) includes Policy G3 on MOL. The requirements of this policy are similar to the adopted London Plan, i.e. continued need to protect MOL from inappropriate development, including development which has the potential to harm MOL, and through encouraging the enhancement of quality and range of uses for MOL. The criteria for designating MOL remain broadly unchanged, although the wording of the existing criteria d has been refined:

‘It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.’

The supporting text to Policy G3 states that the principles of national Green Belt policy (2012 NPPF – paragraphs 79-92<sup>24</sup>) continue to apply to MOL, which ensure that any proposed changes to MOL boundaries, which result in a loss, must provide evidence demonstrating the exceptional circumstances that relate to the site.

The emerging London Plan supports proposals to enhance access to MOL, and improve poorer quality areas, to provide benefits for Londoners. For example, improving public access for all, recreation facilities and landscaping improvements will be encouraged.

## **A2.3 Local Policy**

Hounslow’s policy on MOL is set out in Policy GB1 of the Hounslow Local Plan (2015). This reiterates the equal protection afforded to MOL as Green Belt, and emphasises the Borough’s commitment to positive management and improvements to public access.

Through Policy GB1, the Borough commits to establishing the extent of MOL ‘in line with the Mayor of London’s designation’, protecting MOL by ‘ensuring that any development is not inappropriate and meets the purposes’, and working with partners to improve public access, ‘including the promotion of sports, recreation, leisure and cultural uses that fall within the acceptable uses outlined in the NPPF’.

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<sup>23</sup> R, Lensbury Ltd (2016), (On the application of) v Richmond-Upon-Thames London Borough Council.

<sup>24</sup> The NPPF referenced in the supporting text to Policy 7.17, relates to the 2012 version.

## A2.4 Green Belt to MOL ‘Swaps’ – Experience Elsewhere

The GBR identified a number of General Areas that perform weakly against the NPPF purposes, but that serve an important role as open space. It was recommended that the Council should explore the maintenance and strengthening of these areas “through the adoption of alternative designations”, particularly given their role as strategic green corridors which permeate the urban area. In the Draft West of Borough Plan review, Hounslow have proposed that a number of areas of Green Belt should be re-designated as MOL.

While there is limited precedent for the ‘swapping’ of Green Belt to MOL, there is one example of where a local authority successfully achieved this at examination. LB Ealing proposed in its submission Core Strategy (2011) to amend Green Belt boundaries around a sports ground and re-designate the site as MOL. A detailed audit of Green Belt sites throughout the Borough had found that the site did not meet the purposes of Green Belt and is only connected to the wider Green Belt through a narrow strip of land. The Inspector concurred that a MOL designation would be more appropriate, particularly given MOL would afford the same level of protection as the Green Belt designation it replaced, and agreed to the Council’s proposed boundary amendments.<sup>25</sup> However, Ealing’s Green Belt Review was published pre-NPPF (2012) and therefore, it could be questioned whether the re-designation of the Green Belt site into MOL, fully complies with national policy.

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<sup>25</sup> Ealing Council Development (or Core) Strategy DPD, Inspector’s Report, January 2012

## **Appendix B**

### Methodology

## B1 Green Belt Methodology

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This section sets out the methodology for undertaking the GBR Stage 2.

### B1.1 Step 1: Area Identification

There is no agreed approach to identifying sub-areas for this stage of assessment. We therefore reviewed experience elsewhere, and considered recent advice from PINS, in developing the methodology (see Section 2 and Appendix A).

As highlighted in section 2, the GBR Stage 2 took forward those General Areas identified for potential sub-division (referred to as ‘sub-areas’) for further consideration. In addition, as the GBR Stage 2 will feed directly into LBH’s site selection process, sites identified in the Council’s emerging capacity work in the West of Borough area, were reviewed for potential inclusion in the assessment. Figure B1.1 illustrates the General Areas for potential sub-division and the capacity study sites initially considered as part of Step 1.

### Major Policy Constraints

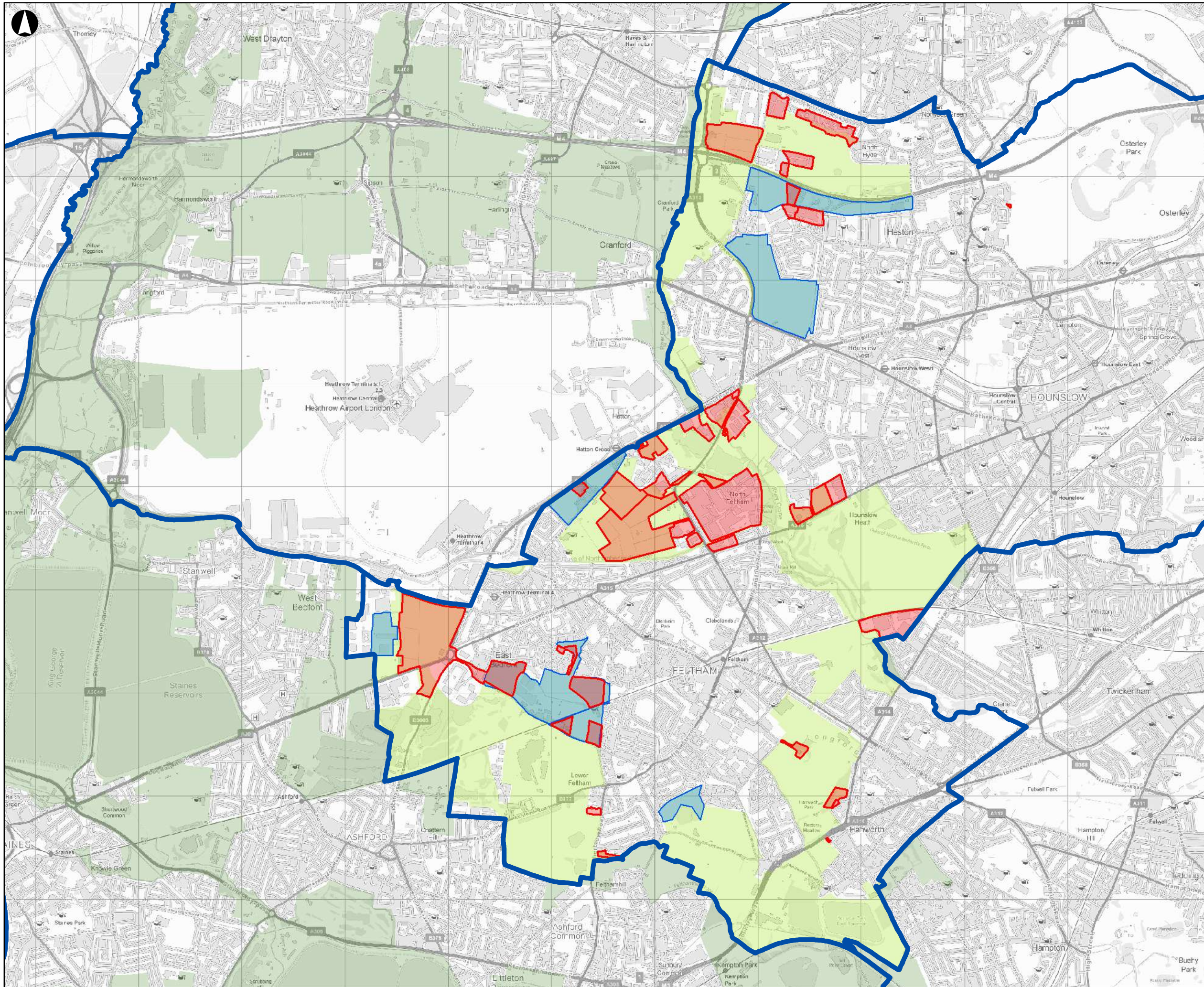
A filtering process to remove sites, which were entirely or largely constrained by major policy constraints was undertaken. These national or regional policy constraints effectively rule out development of the land. The following ‘major policy constraints’ were used:

- Flood zone 3b (functional floodplain)
- Sites of international and national nature conservation importance<sup>26</sup>
  - Special Protection Areas (SPAs)
  - Special Areas of Conservation (SACs)
  - Ramsar Sites
  - Sites of Special Scientific Interest (SSSI)
- Sites of Importance for Nature Conservation (SINCs)
  - Sites of Metropolitan Importance (SMI)
- Country Parks
- Public safety zone.

Locations affected by these constraints were mapped using GIS data supplied by LBH and used to refine definition of the sites (Figure B1.2). Areas subject to major policy constraints which fell within General Areas identified for potential sub-division (in the GBR Stage 1) or within sites identified in the Council’s emerging capacity work in the West of Borough area, were instead considered as part of the MOL Assessment (see Section B2).

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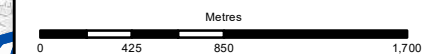
<sup>26</sup> Special Protection Areas (SPAs) are the only constraint within this category that is applicable to the Green Belt within Hounslow.



- Legend**
- Capacity Study sites
  - Parts of General Areas recommended for further consideration in GBR Stage 1
  - Borough Boundaries
  - Hounslow Green Belt
  - Neighbouring Green Belt

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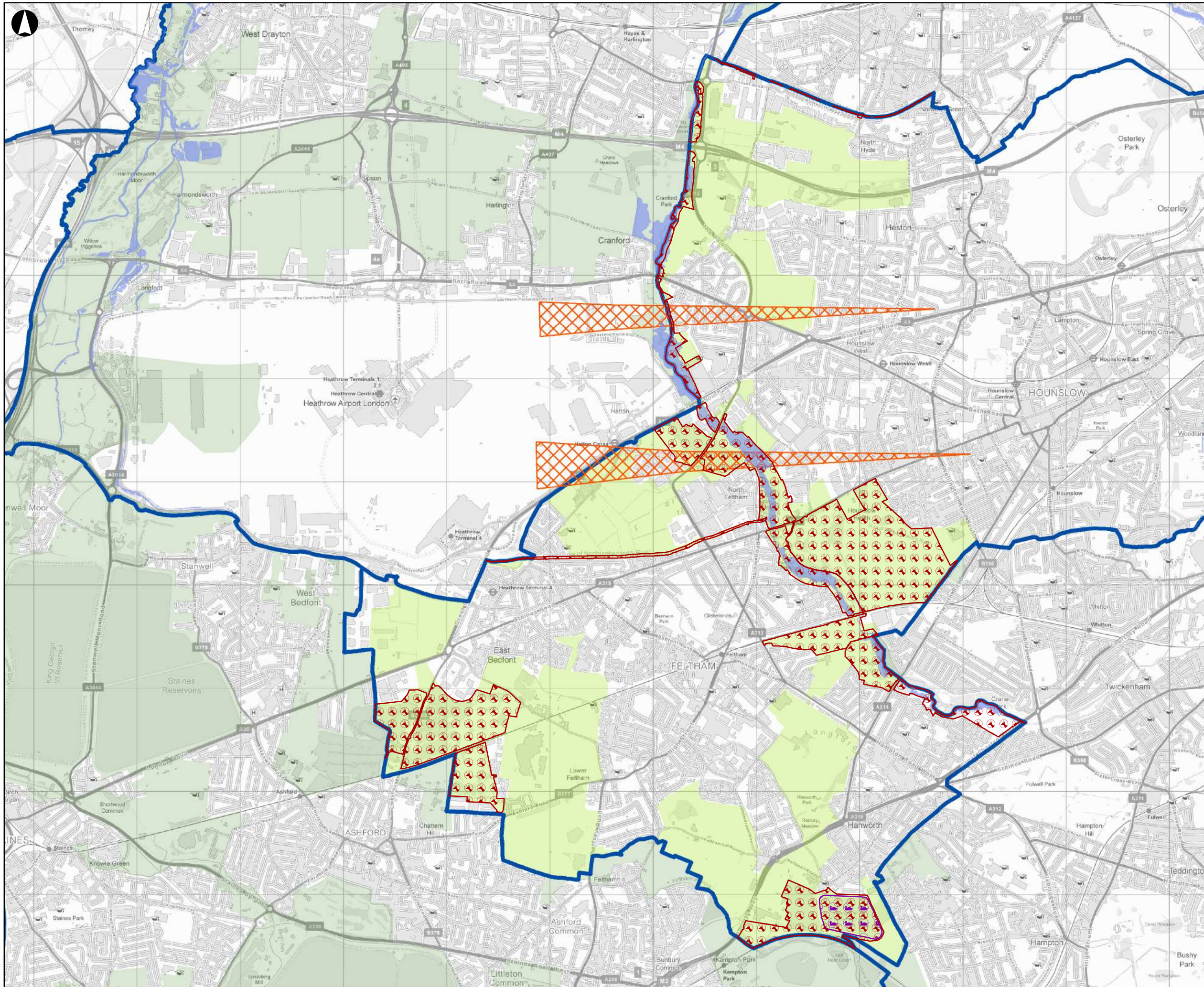
Client  
**London Borough of Hounslow**

Job Title  
**Hounslow Green Belt Review - Stage 2**

**Figure B1.1 General Areas and Sites Considered**

Scale at A3  
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Drawing No <b>B1.1</b>	Issue <b>P1</b>

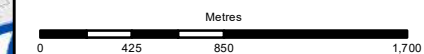


**Legend**

- Borough Boundaries
- Neighbouring Green Belt
- Hounslow Green Belt
- SINC - SMI
- SPA
- Flood Zone 3b
- Public Safety Zone

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**Figure B1.2 Major Policy Constraints**

Scale at A3  
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Job No <b>263470-00</b>	Drawing Status <b>Final issue</b>
Drawing No <b>B1.2</b>	Issue <b>P1</b>

## B1.2 Step 2: Defining Sub-Area Boundaries

Given the requirement through paragraph 139 of the NPPF for Green Belt boundaries to be defined ‘clearly, using physical features that are readily recognisable and likely to be permanent’, it therefore follows that sub-areas should be defined to reflect these principles from the outset.

The process of defining the boundaries of the ‘sub-area’ was undertaken in line with the general principles used to identify the General Areas in GBR Stage 1, however applied on a more flexible basis to reflect the more granular nature of the assessment.

Permanent and defensible boundary features, both man-made and natural, were again used (Table B1.1). Due to the more granular nature of the work, additional boundary features will play a particularly important role in compartmentalising the Green Belt into smaller areas for further assessment.

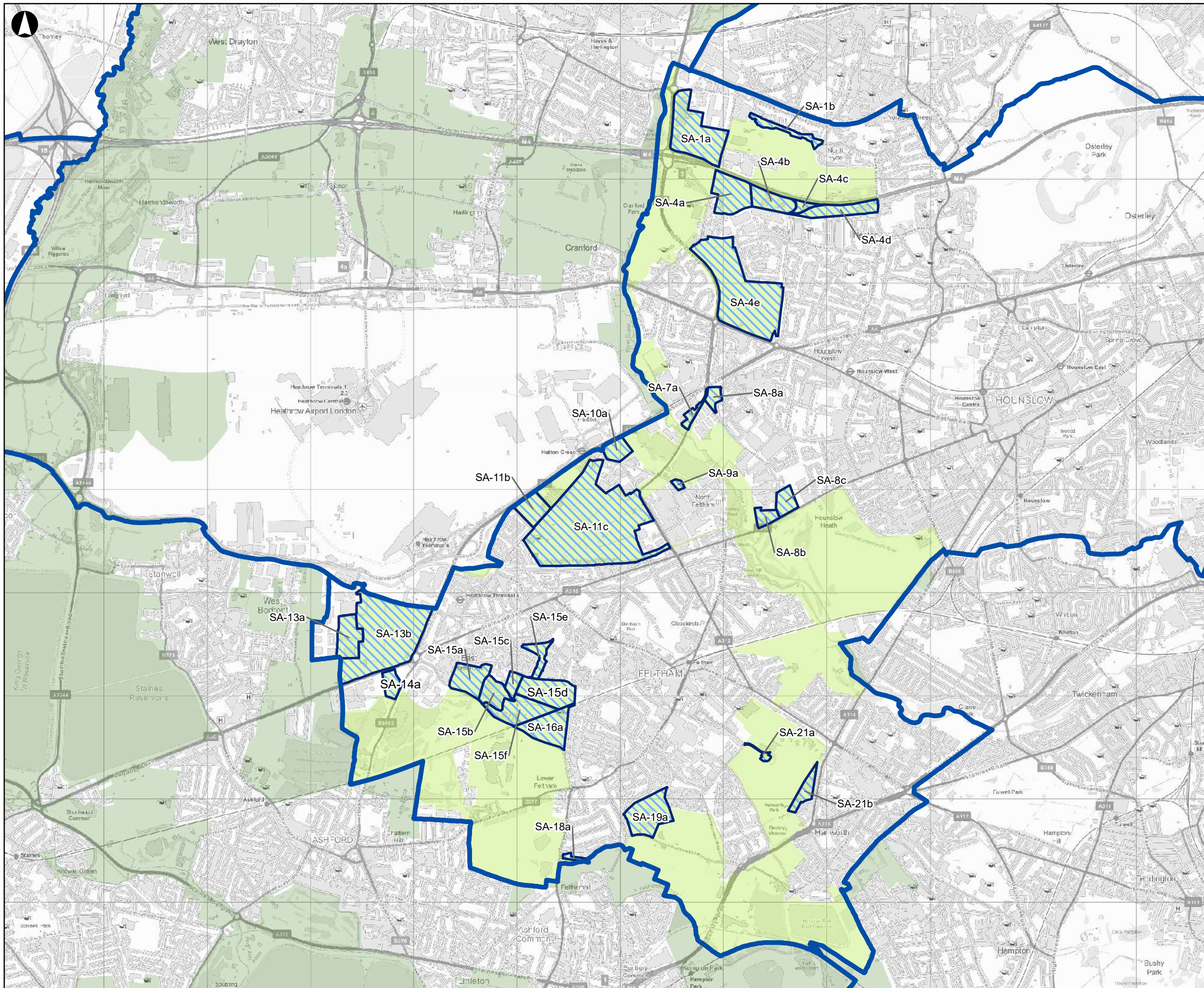
**Table B1.1 - Boundary Features for Identifying Sub-Areas**

Permanent Man-made and Natural Features	Additional Boundary Features
Motorways	Unclassified public and private roads
A and B Roads	Smaller water features, including streams, canals and other watercourses
Railways lines	Prominent physical features (ridgelines)
River Crane	Existing development with strongly established, regular or consistent boundaries
Reservoirs	Established and unbroken woodland or hedgerow





Sub-area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps ‘birds eye’ views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the sub-area and involved an element of professional judgement. Each sub-area was assigned a unique reference number, (Figure B1.3).

## B1.3 Step 3: Site Visits

All sub-areas were visited to understand their immediate context, character and boundary features. Photographs of all sub-areas were taken (access permitting) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider Green Belt and adjacent settlements. Pro-formas for each sub-area were used to record the assessments against each criterion, together with observations from site visits and photographs.

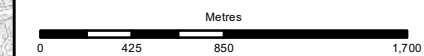


### Legend

-  Borough Boundaries
-  Neighbouring Green Belt
-  Hounslow Green Belt
-  Sub-areas for Green Belt Assessment

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**Figure B1.3 Sub-areas for Green Belt Assessment**

Scale at A3  
**1:35,000**

Job No  
**263470-00** Drawing Status  
**Final issue**

Drawing No  
**B1.3** Issue  
**P1**

## B1.4 Step 4: Assessment of Sub-Areas

The assessment process involved a mixture of evidence from desk-based research, including contextual information and secondary data sources such as aerial photography, Google Streetview, and historic maps and well as primary evidence obtained through the site visits.

The aim of the assessment was to establish any differentiation in terms of how sub-areas function and fulfil the purposes of the Green Belt. The assessment of the sub-areas was undertaken in two strands:

- Assessment against the NPPF Purposes; and
- Appraisal of role and importance of the sub-area in terms of the function of the wider Green Belt, (taking into consideration the General Area scores from the GBR Stage 1).

## B1.5 Step 4a: Assessment against Green Belt Purposes

As part of the methodology for the GBR Stage 1, three of the five Green Belt purposes were considered. This approach was maintained for this part of the assessment. As such, each sub-area was assessed against NPPF Purposes 1-3:

- 1. To check the unrestricted sprawl of the large built-up areas.**
- 2. To prevent neighbouring towns merging into one another.**
- 3. To assist in safeguarding the countryside from encroachment.**

As per GBR Stage 1 NPPF Purposes 4 and 5 were excluded from the assessment.

- 4. To preserve the setting and special character of historic towns,** was excluded as none of the settlements within Hounslow meet the definition of a historic Town.
- 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land,** was excluded as assessment against this purpose will not enable a distinction between sub-areas as all Green Belt achieves the purpose. It is difficult to distinguish the individual contribution that a single parcel of land makes to encouraging the re-use of urban land.

As with the GBR, one or more criteria were developed for each purpose using both qualitative and quantitative measures, and a score out of five attributed to each criterion (Table B1.2). For consistency with the GBR, each NPPF purpose was considered equally significantly, and therefore no weighting or aggregation of scores across the purposes was undertaken. As such, a composite judgement will be necessary to determine where, overall, Green Belt sub-areas are meeting Green Belt purposes strongly or weakly.

**Table B1.2 Criterion scores**

Overall strength of Green Belt sub-area against criterion	Score	Equivalent Wording
↓	0	Does not meet Criterion
	1	Meets Criterion Weakly or Very Weakly
	2	Meets Criterion Relatively Weakly
	3	Meets Criterion
	4	Meets Criterion Relatively Strongly
	5	Meets Criterion Strongly or Very Strongly

## Purposes 1 and 2

**To check the unrestricted sprawl of the large built-up areas**

**To prevent neighbouring towns merging into one another**

In line with the GBR Stage 1, Purposes 1 and 2 were considered together. In Hounslow, the issues of sprawl and coalescence are closely inter-linked; when considered in the context of the wider Metropolitan Green Belt, 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.

To maintain consistency with the GBR, the Purpose 1 and 2 criteria were applied in relation to the following identified built-up areas in Table B1.3 and Figure B1.4.

**Table B1.3 Built-up Areas Used for the Purpose 1 and 2 Assessment**

Hounslow Built-up Areas	Neighbouring Local Authority Built-up Areas
Greater London built-up area (including Heathrow Airport) (LB Hillingdon, LB Ealing, LB Richmond upon Thames) <sup>27</sup>	Ashford / Stanwell / Sunbury-on-Thames (Spelthorne) <sup>28</sup> Harlington (LB Hillingdon) <sup>29</sup>

## Assessment Criteria

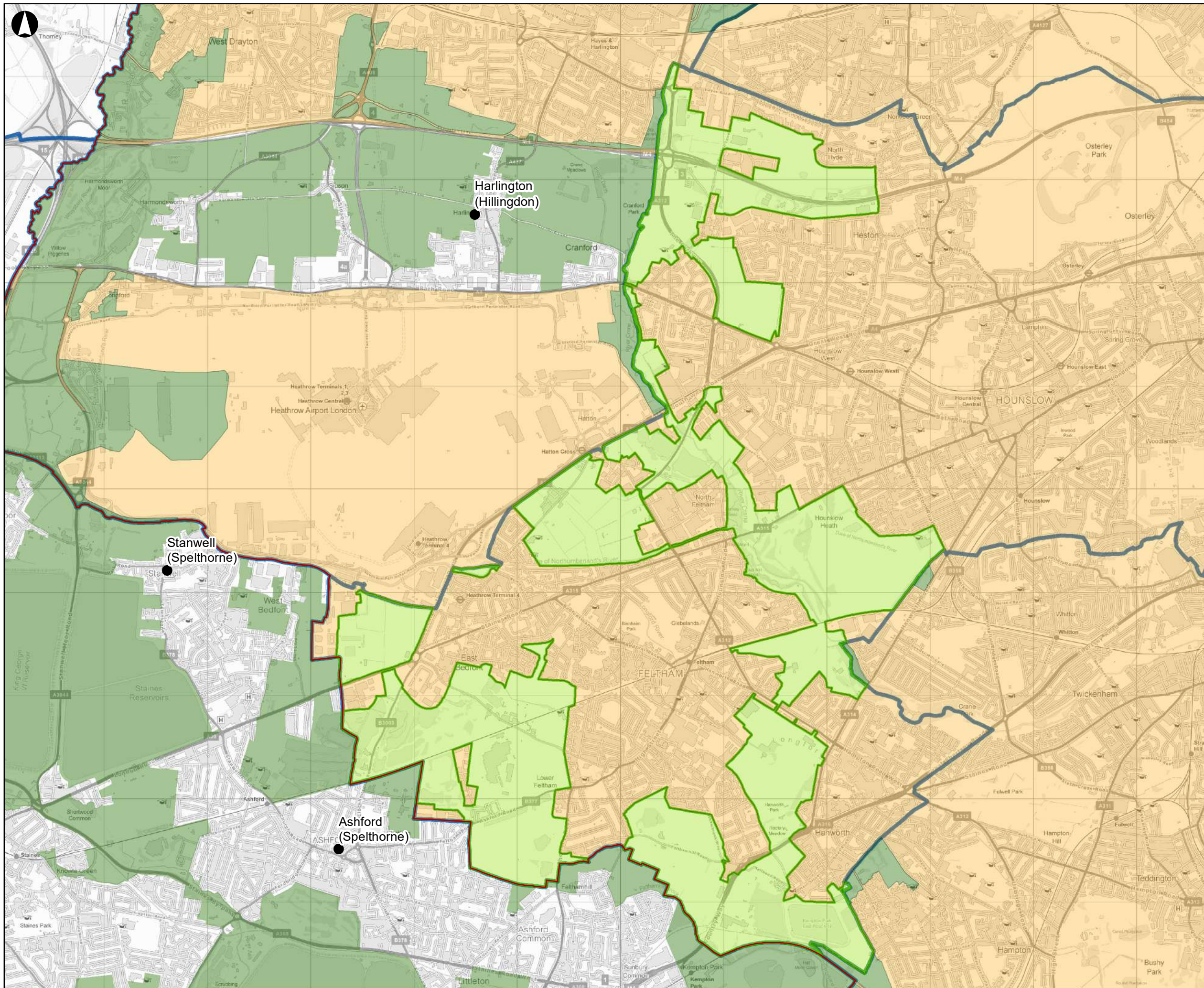
### Criteria a Assessment

The criteria a considered on a ‘pass / fail’ basis, whether the Green Belt sub-area protects open land at the edge of one or more discrete large built-up area(s). Reflecting the more granular scale of this study, some sub-areas may not be physically at the edge of a large built-up area but, may be visually or functionally

<sup>27</sup> Including all non-Green Belt land in Hounslow and, for the most part, in Hillingdon, Ealing and Richmond-upon-Thames.

<sup>28</sup> 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.

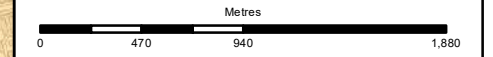
<sup>29</sup> Harlington in Hillingdon is treated as a discrete built-up area due to its relative separation from the rest of Greater London.



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

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**Figure B1.4 Greater London Built-up Area and Neighbouring Built-up Areas**

Scale at A3  
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linked to it. Therefore, decisions as to whether a sub-area is at the edge of a large built-up area were made utilising professional judgement.

Where a sub-area failed against criteria a, it was not considered against criteria b.

### **Criteria b Assessment**

As stated at (a), Green Belt should function to protect open land at the edge of discrete large built-up areas. The extent to which a sub-area prevents sprawl is dependent on:

- The extent to which a sub-area is contained or surrounded by built development and the level of connections to the wider Green Belt. Sub-areas that are almost entirely enclosed by built development as part of a single built-up area do not prevent sprawl (rather, potential development would likely be classified as infill);
- The physical relationship between the sub-area and the respective built-up area(s). The regularity and strength of inner boundaries and outer boundary features in maintaining the edges of built-up areas and serving as barriers in the absence of the Green Belt. Where the built edge is predominantly irregular or comprised of less durable features (such as footpath or inconsistent tree line), the Green Belt plays an important role in preventing sprawl. While; where the built-edge is predominantly regular or comprised of durable features (such as railway line or canal), the Green Belt is an additional barrier to sprawl; or
- In the absence of a durable built-edge, the presence of prominent man-made and natural boundary features (as defined in Table B2.1) in the Green Belt and the contribution of such features to restricting the scale of outward growth, (both in physical and perceptual terms), and ensuring development is regular and/or 'tidy'.

### **Criteria c Assessment**

The extent to which an area of Green Belt protects a valued gap in the built-form was assessed based on the following definitions:

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

This assessment considered whether the Green Belt could physically or visually accommodate growth without fundamentally compromising the gaps between settlements. In determining the extent to which a gap prevents coalescence, various factors were taken into consideration including distance, natural or man-made barriers and topography.

**Table B1.4 Purpose 1 & 2 Assessment Criteria**

Purpose	Criteria	Score
<p>To check the unrestricted sprawl of the large built-up areas</p> <p>To prevent neighbouring towns from merging</p>	(a) Land parcel is located at the edge of a discrete built-up area.	PASS (at edge) / FAIL (not at edge)
	(b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a discrete built-up area in the absence of another durable boundary.	<p>5: Sub-area prevents the outward sprawl of (a) large built-up area(s) where there are no outer boundary features to restrict the scale of growth and regularise development form.</p> <p>3: Sub-area prevents the outward sprawl of (a) large built-up area(s). There are outer boundary features present which may restrict the scale of growth and regularise development form, however the inner boundaries are predominantly 'irregular', lacking durability or permanence.</p> <p>1: Sub-area prevents the outward sprawl of (a) large built-up area(s), but there are outer boundary features present which may restrict the scale of growth and regularise development form and the inner boundaries are predominantly 'regular'.</p> <p>0: Sub-area is 'enclosed' by a large built-up area, thus does not prevent outward sprawl.</p>
	(c) Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas.	<p>5: Sub-area forms an essential gap, where development would significantly visually or physically reduce the perceived or actual distance between settlements.</p> <p>3: Sub-area forms a gap, or part of a 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: Sub-area form a less essential gap, or the less essential part of a gap, which is of sufficient scale and character that development is unlikely to cause merging between settlements.</p> <p>0: Sub-area does protect a gap between neighbouring settlements.</p>

## Purpose 3

### To assist in safeguarding the countryside from encroachment

The Purpose 3 criterion (Table B1.5) is the same as that used in the GBR and considers openness (in terms of extent of existing built development) and the degree to which the Green Belt has a sense of rural or countryside character.<sup>30</sup>

The score attributed to a sub-area is based on the built form percentage and a qualitative assessment of character from site visits. The percentage of built form within a Green Belt sub-area was calculated using GIS tools based on the land area of manmade (constructed) features as classified within the Ordnance Survey MasterMap data. This data includes buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures but excludes roads and railway lines.

The assessment considered the extent to which a sub-area might be reasonably identified as ‘countryside’ / ‘rural’ (in line with the NPPF). As highlighted in the GBR, judging whether land has a ‘countryside’ / ‘rural’ character can be challenging, particularly in a rural-urban fringe context such as LBH. The judgement considered land uses (including agricultural use), morphology (shape and scale), context, land management (in particular, the presence of urban managed parks), topography and landform, and links to the wider Green Belt. The following categorisation of sub-area character were used:

- ‘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, largely characterised by rural land uses and landscapes but with some dispersed development and man-made structures. Sub-area of sufficient scale 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’ - land that is dominated by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

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<sup>30</sup> For the purposes of this assessment, the terms ‘rural’ and ‘countryside’ are used interchangeably.

**Table B1.5 Purpose 3 Assessment Criterion**

Purpose	Criterion	Score
<b>Assist in safeguarding the countryside from encroachment</b>	Protects the openness of the countryside and is least covered by development.	<p>5: Contains less than 5% built form and possesses a strong unspoilt rural character.</p> <p>4: Contains less than 10% built form and/or possesses a strong unspoilt rural character.</p> <p>3: Contains less than 20% built form and/or possesses a largely rural character.</p> <p>2: Contains less than 30% built form and/or possesses the characteristics of CIAT.</p> <p>1: Contains less than 30% built form and possesses an urban character.</p> <p>0: Contains more than 30% built form and possesses an urban character.</p>

## Overall Performance

In line with the GBA, overall performance against the purpose assessment criteria was determined as follows:

- Any sub-area scoring strongly or very strongly (4 or 5) against the criteria for one or more NPPF purpose was judged to meet the purpose assessment criteria strongly;
- Any sub-area scoring moderately (3) against at least one NPPF purpose and failing to score strongly or very strongly (4 or 5) against any purpose was judged as meeting the purpose assessment criteria moderately; and
- Any sub-area scoring weakly or very weakly (1 or 2) across all NPPF purposes was judged to meet the purpose assessment criteria weakly.

## B1.6 Step 4b: Assessment of Impacts on the Wider Green Belt

A qualitative assessment was undertaken to identify the roles of the sub-areas as part of the GBA General Area within which it is located and the wider Green Belt. Where relevant, the cumulative loss of adjacent sub-areas was also considered. For sub-areas located on or over the borough boundaries, consideration was given to available results from neighbouring authority Green Belt assessments.

The qualitative assessments considered the following:

- What is the role of the sub-area in the context of the GBA Parcel within which the sub-area is located? How does the performance of these areas compare? How important is the sub-area to the performance of the Parcel?
- Would the potential release of a sub-area impact on the assessment of adjacent sub-areas? For example, would the scores of the adjoining sub-area(s), be likely to change as a result of the sub-division and if so to what extent?

- Would the potential release of a sub-area harm the long-term protection or integrity of the surrounding Green Belt?

For each sub-area, an overall conclusion was made on the level of contribution to the wider strategic Green Belt – important, partly important or less important. This was judged qualitatively, based on a composite judgement of the factors described above.

## **B1.7 Step 4c: Consideration of Boundaries**

The final assessment step considered whether release of the sub-area(s) would impact on the relative strength of the Green Belt boundary and whether any new boundary would be compliant (or could reasonably be made to be compliant through mitigation) with the requirements of paragraph 139 of the NPPF for boundaries to be defined *‘clearly, using physical features that are readily recognisable and likely to be permanent’*.

The relative strength of boundaries was not a determining factor in the final categorisation, given it may be possible in certain circumstances to secure mitigation to strengthen currently weak boundaries or to provide new boundaries where gaps exist (e.g. through a site allocation policy). While it is noted where this might be required in the final recommendations, the decision on the appropriateness of strengthening existing, or creating new boundaries will be for the Council to make, including how such mitigation might be secured.

## **B1.8 Step 5: Categorisation and Recommendations**

Following the assessment of the sub-areas against the NPPF Purposes (Step 4a) and assessment of the impacts on the wider strategic Green Belt (Step 4b), each sub-area was categorised as shown in Table B1.6. The categorisation identified which sub-areas should be retained within the Green Belt; and the sub-area, combination of sub-areas, or part of sub-area recommended for further consideration. Each recommended sub-area was assigned a unique reference number.

The categorisation process recognises the potential existence of sub-areas, which meet one or more of the Green Belt purposes strongly but that overall make a lesser contribution to the Purposes when compared with the wider Green Belt Parcel in which they lie; or where, if removed from the Green Belt, it is unlikely that there would be harm upon the function or integrity of the surrounding Green Belt Parcel(s) or sub-area(s). Conversely, it also reflects the possibility for sub-areas which meet the Purpose Assessment Criteria weakly but that are integral to maintaining the protection or integrity of the surrounding Green Belt.

**Table B1.6 Sub-area Categorisation**

Meets Purpose Assessment Criteria	Contribution to Wider Strategic Green Belt	Recommendation
Strongly	Important	Not recommended for further consideration
Strongly	Less important	Recommended for further consideration
Strongly	Part of sub-area less important	Part recommended for further consideration
Moderately	Important	Not recommended for further consideration
Moderately	Less important	Recommended for further consideration
Moderately	Part of sub-area less important	Part recommended for further consideration
Weakly	Important	Not recommended for further consideration
Weakly	Less important	Recommended for further consideration
Weakly	Part of sub-area less important	Recommended for further consideration

## B2 MOL Assessment Methodology

### B2.1 Scope and context

This section sets out the methodology for the Metropolitan Open Land (MOL) Assessment. As set out in Section 2, this assessment considered the following areas against the Metropolitan Open Land (MOL) criteria set out in the London Plan (mirrored in the draft New London Plan), e.g. whether they could be re-designated as MOL:

- Weakly performing General Areas identified in the GBR Stage 1 as being of particular local importance in terms of their open space value and role as part of wider green corridors;
- Parts of General Areas recommended for potential sub-division which are subject to major policy constraints (following Step 2 of the Stage 2 GBR); and
- Sites within the General Area emerging from the Council's own emerging capacity work in the West of Borough area which are subject to major policy constraints.

Figure B2.1 shows the location of these areas within the Green Belt.

Within the adopted and emerging London Plan, the Mayor accords considerable significance to MOL as an integral part of London's green infrastructure network and effectively making it subject to the same level of protection as Green Belt. This position is also reinforced by Policy GB1 within the Adopted Hounslow Local Plan<sup>31</sup>.

A key aspect of MOL of direct relevance to this assessment is the concept of openness, which is central to consideration of MOL and has also formed a

<sup>31</sup> London Borough of Hounslow, 2015, Local Plan 2015-2030

fundamental part of recent appeal decisions in relation to development proposals within MOL<sup>32</sup>. In the context of MOL, openness goes substantially beyond just visual effects, relating also to spatial effects of potential development, and it should be thought of as one of the primary characteristics of such land. This concept has therefore been central to framing the criteria for the assessment, which are presented below.

## **B2.2 Assessment criteria and application**

The assessment criteria are based on the four criteria underpinning MOL set out in the London Plan. In some instances where the criteria overlap considerably these have been combined within the assessment definitions (Table B2.1).

Figure B2.2 and B2.3 identify the ecological, historic and recreational designations surrounding and within the parcels, which form the basis of scores for Criteria B and C.

A five-point scale is applied to the relevant criteria, where 1= weak and 5 = strong, with justifications set out in table 1. For consistency with the GBR, each MOL criterion was considered equally significant, and therefore no weighting or aggregation of scores across the criteria was undertaken. As land only needs to meet one of the criteria to be considered for MOL designation, the highest scoring criteria provides the overall score.

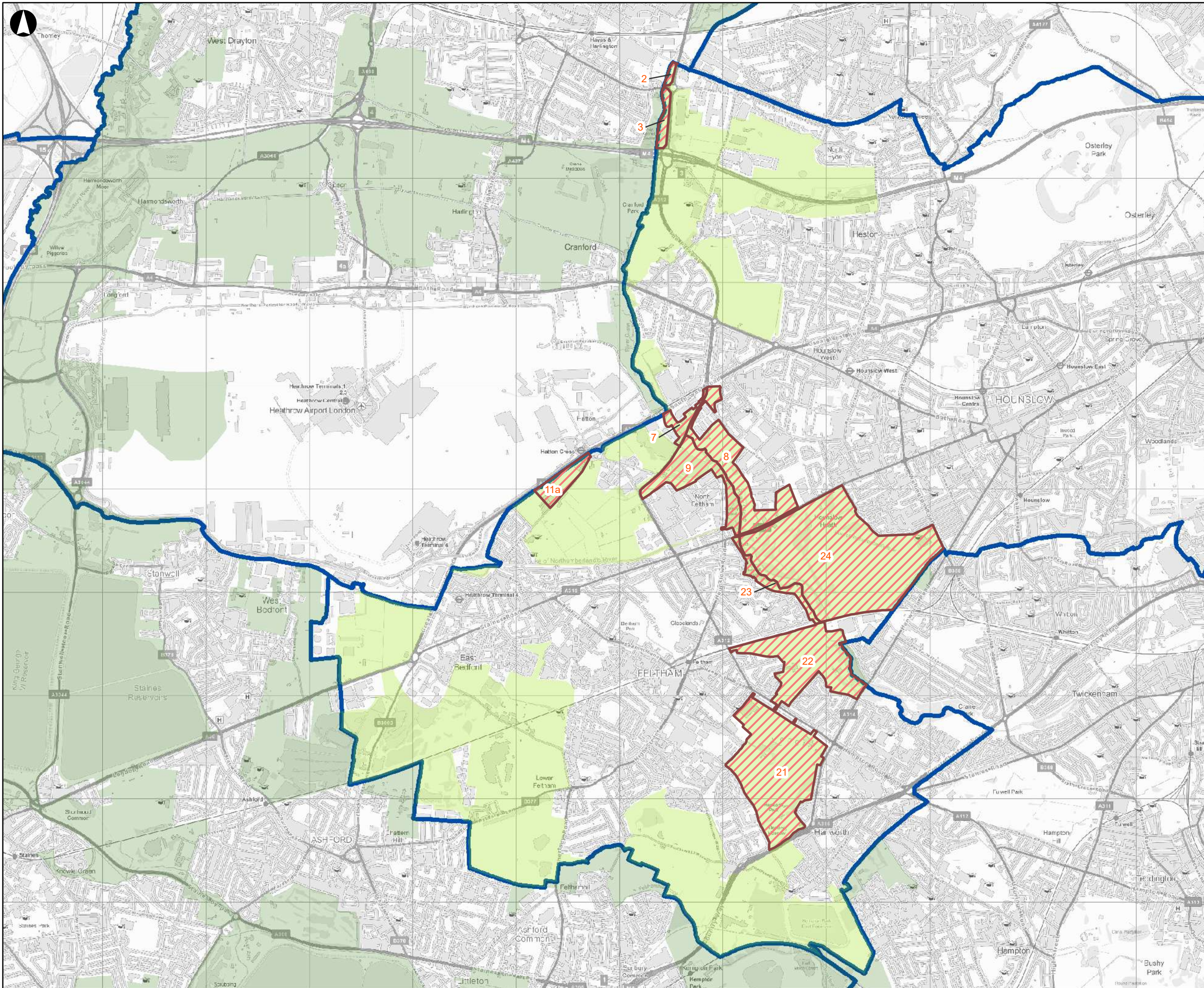
Table B2.1 also sets out the data and information sources to be applied in assessing sites against each of the criteria. These criteria were used as the basis for a field survey proforma to capture and verify information and recommendations during site visits and as the primary evidence base for reporting.

## **B2.3 Summary: Application of the scoring / recommendations development**

The summary scores and narratives and a set of concise recommendations relating to the potential strategic direction for the parcels in question in light of the analysis, e.g. conserve, enhance, restore, consider for other uses etc have been captured in the pro formas. The recommendations developed draw upon the field survey findings.

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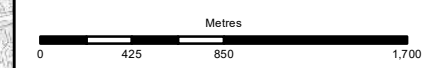
<sup>32</sup> Appeal Ref: APP/H5960/W/16/3163832: Tooting Bec Railway Embankment, Off Cavendish Road, Streatham, London (Inspector's report by Fort, GJ, 24<sup>th</sup> February 2017; Appeal Ref: APP/G5180/W/16/3144248: Land to the rear of former Dylon International Premises, Station Approach, Lower Sydenham, London SE26 5HD (Inspector's report by Peerless, K, 2<sup>nd</sup> August 2016



- Legend**
- Borough Boundaries
  - Neighbouring Green Belt
  - Hounslow Green Belt
  - General Areas (GBA) & sub-areas for MOL Assessment

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**Figure B2.1 General Areas and Sub-areas for MOL Assessment**

Scale at A3  
**1:35,000**

Job No <b>263470-00</b>	Drawing Status <b>Final issue</b>
Drawing No <b>B2.1</b>	Issue <b>P1</b>

**Table B2.1 - Assessment criteria**

London Plan MOL Criterion A: ‘Contributes to the physical structure of London by being clearly distinguishable from the built-up area’				
Potential data and information sources: Ordnance Survey 1:25,000 Explorer mapping and MasterMap data, aerial photography, historic mapping/map regression where available/relevant, field survey.				
ASSESSMENT THRESHOLDS AND DEFINITIONS				
Weak	Weak-Moderate	Moderate	Moderate-Strong	Strong
<p>Parcel is significantly eroded by built/ancillary development which creates highly notable incursions in the parcel/blurs the relationship between built form and open space/creates a highly permeable boundary with a very weak sense of contrast between the two.</p> <p><i>And/or:</i> Very weak landscape structure and/or low levels of topographic variation, such that edge conditions are very poorly defined.</p>	<p>Built development is notable in parts of the parcel.</p> <p><i>And/or:</i> Sense of openness is relatively weakly defined with a clearly apparent sense of erosion by development and urbanising influences.</p> <p><i>And/or:</i> Fairly low level of topographic variation contributing to definition of edge conditions, or partly fragmented landscape structure (likely to have great enhancement potential).</p>	<p>Built development is generally absent across much of the area.</p> <p><i>And/or:</i> Sense of openness is mostly well-defined with only localised erosion by development and urbanising influences.</p> <p><i>And/or:</i> Reasonable level of topographic variation contributing to definition of edge conditions, or fair landscape structure (which may have enhancement potential).</p>	<p>Built development is largely absent.</p> <p><i>And/or:</i> The parcel provides a clear and well-defined sense of openness and separation, such that sense of openness is more than apparent.</p> <p><i>And/or:</i> Contains strong and possibly varied landscape structure and/or topographic variation, which define edge conditions.</p>	<p>Built development is completely absent.</p> <p><i>And/or:</i> The parcel provides a very clear and highly defined sense of openness and separation, such that openness is the defining/dominant characteristic of the parcel.</p> <p><i>And/or:</i> Contains very strong and varied landscape structure (intimate spatial scale and landscape mosaic) and/or topographic variation, which define edge conditions – a hard, well-defined boundary.</p>

**London Plan MOL Criterion B: ‘Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London’**

Potential data and information sources: Ordnance Survey 1:25,000 Explorer mapping and MasterMap data, aerial photography, All London Green Grid and local greenspace assessment/green infrastructure strategy mapping where available, Local Plan and National Land Use data (where available), field survey.

**ASSESSMENT THRESHOLDS AND DEFINITIONS**

<b>Weak</b>	<b>Weak-Moderate</b>	<b>Moderate</b>	<b>Moderate-Strong</b>	<b>Strong</b>
A very local level and/or weakly performing GI <sup>33</sup> asset/of low GI functionality.	A GI site of neighbourhood level importance.  <i>And/or:</i> A parcel which contains open air sport, recreational or cultural facilities of neighbourhood importance/catchment.	Recognised as a GI site of at least district or borough level importance.  <i>And/or:</i> A parcel which contains open air sport, recreational or cultural facilities of borough-wide importance/catchment.	A strategic GI site of importance to more than one borough.  <i>And/or:</i> Parcel contains ‘destination’ open air sports, recreational or cultural facilities of importance for several boroughs.	A strategic GI site of London-wide importance.  <i>And/or:</i> Parcel contains ‘destination’ open air sports, recreational or cultural facilities of London-wide importance, which may also serve a catchment beyond London.

<sup>33</sup> Green Infrastructure (GI)

**London Plan MOL Criteria C and D:**  
**C: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’**  
**D: ‘Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria’**

Potential data and information sources: Ordnance Survey 1:25,000 Explorer mapping and MasterMap data, aerial photography, landscape and townscape characterisations and relevant Conservation Area appraisals, Historic Parks and Gardens Register and citations plus local list, relevant statutory and local heritage designations and nature conservation designations, UKBAP/Local BAP Habitat and Priority Habitat data, green infrastructure datasets, field survey.

**ASSESSMENT THRESHOLDS AND DEFINITIONS**

Weak	Weak-Moderate	Moderate	Moderate-Strong	Strong
<p>Parcel is not part of/not linked to landscapes of national importance (Registered Battlefields or Registered Parks and Gardens).</p> <p><i>And/or:</i></p> <p>Parcel may make a very weak or tangential contribution to a locally listed landscape.</p> <p><i>And/or:</i></p> <p>Parcel is/forms part of a very local level GI/recreational asset.</p> <p><i>And/or:</i></p> <p>Is un-designated for ecological interest, supporting common-place habitats.</p> <p><i>And/or:</i></p> <p>Parcel may be in very poor condition/very poorly maintained and managed.</p>	<p>Parcel may form at most a secondary part of a Registered Park and Garden (e.g. on its periphery).</p> <p><i>And/or:</i></p> <p>Parcel is partially linked to a GI asset of Metropolitan significance.</p> <p><i>And /or:</i></p> <p>Parcel may be designated as a candidate SINC/SNCI<sup>34</sup>, or may support habitats of parish value.</p> <p><i>And/or:</i></p> <p>Has a generally fragmented green link/access network, likely to be of at most</p>	<p>Parcel may form a small/minor part of a Registered Park and Garden (e.g. within the boundary but not forming one of the features listed in the citation/not part of a designed view so included in the listing).</p> <p><i>And/or:</i></p> <p>Parcel forms a small part of or is partially linked to a GI asset of Metropolitan significance.</p> <p><i>And /or:</i></p> <p>Parcel may be designated at a sub-regional or district level for its ecological interest (e.g. LNR<sup>36</sup>/SINC/SNCI).</p>	<p>Parcel forms part of a Registered Park and Garden and is likely to contain some features listed in the citation/ parcel contains a Registered Park and Garden in its entirety.</p> <p><i>And/or:</i></p> <p>Parcel forms an important part of a Regional Park or other green space of Metropolitan importance.</p> <p><i>And/or:</i></p> <p>Parcel is ecologically rich, possessing either nationally important habitats or is designated for ecology at the national level (SSSI/NNR<sup>37</sup>), or both.</p>	<p>Parcel forms a key location in a World Heritage Site or is a key part of a Registered Park and Garden/contains many key features listed in the citation/contains a Registered Park and Garden in its entirety.</p> <p><i>And/or:</i></p> <p>Parcel forms an essential part of a Regional Park or other green space of Metropolitan importance.</p> <p><i>And/or:</i></p> <p>Parcel is ecologically outstandingly rich, possessing either internationally important habitats or is designated for ecology at such a level (RAMSAR/Natura 2000 – SPA/SAC/SSSI), or both.</p>

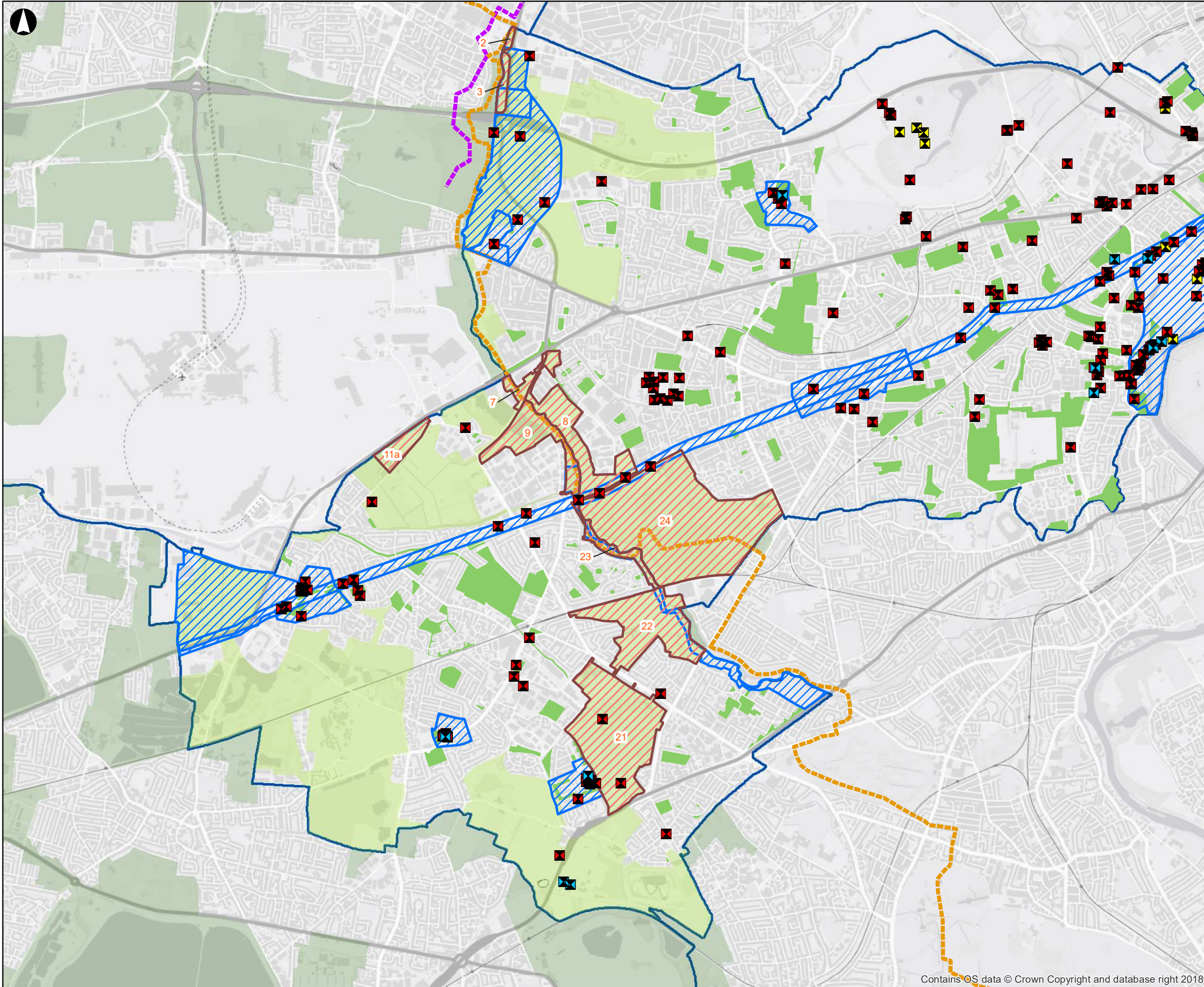
<sup>34</sup> Site of Importance for Nature Conservation (SINC), Site of Nature Conservation Interest (SNCI)

<sup>36</sup> Local Nature Reserve (LNR)

<sup>37</sup> National Nature Reserve (NNR)

<p><b>London Plan MOL Criteria C and D:</b>  <b>C: ‘Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value’</b>  <b>D: ‘Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria’</b></p>				
<p>Potential data and information sources: Ordnance Survey 1:25,000 Explorer mapping and MasterMap data, aerial photography, landscape and townscape characterisations and relevant Conservation Area appraisals, Historic Parks and Gardens Register and citations plus local list, relevant statutory and local heritage designations and nature conservation designations, UKBAP/Local BAP Habitat and Priority Habitat data, green infrastructure datasets, field survey.</p>				
<p><b>ASSESSMENT THRESHOLDS AND DEFINITIONS</b></p>				
<p><b>Weak</b></p>	<p><b>Weak-Moderate</b></p>	<p><b>Moderate</b></p>	<p><b>Moderate-Strong</b></p>	<p><b>Strong</b></p>
<p><i>And/or:</i>                      A GI asset with very low or poor levels of accessibility and connectivity.</p>	<p>secondary level of importance to the GI network (e.g. may also include local routes/PRoWS<sup>35</sup>).</p>	<p><i>And/or:</i>                      Has a partial green link/access network, which may in part fulfil a strategic function as part of a wider GI network.</p>	<p><i>And/or:</i>                      Parcel connects to a green link of London-wide importance, such as a Green Chain. Likely also to contain a mostly well-connected green link network.</p>	<p><i>And/or:</i>                      Parcel contains or forms part of a park of Metropolitan importance or contains part of a green link of London-wide importance, such as a Green Chain. Likely also to contain an extensive or well-connected green link network.</p>

<sup>35</sup> Public Right of Way (PRoW)



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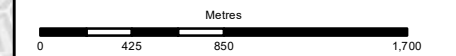
- Borough Boundaries
- Neighbouring Green Belt
- Hounslow Green Belt
- General Areas (GBA) & sub-areas for MOL Assessment
- Archaeological Priority Areas
- London LOOP
- Hillingdon Trail

**Listed Buildings**

- Grade I
- Grade II
- Grade II\*

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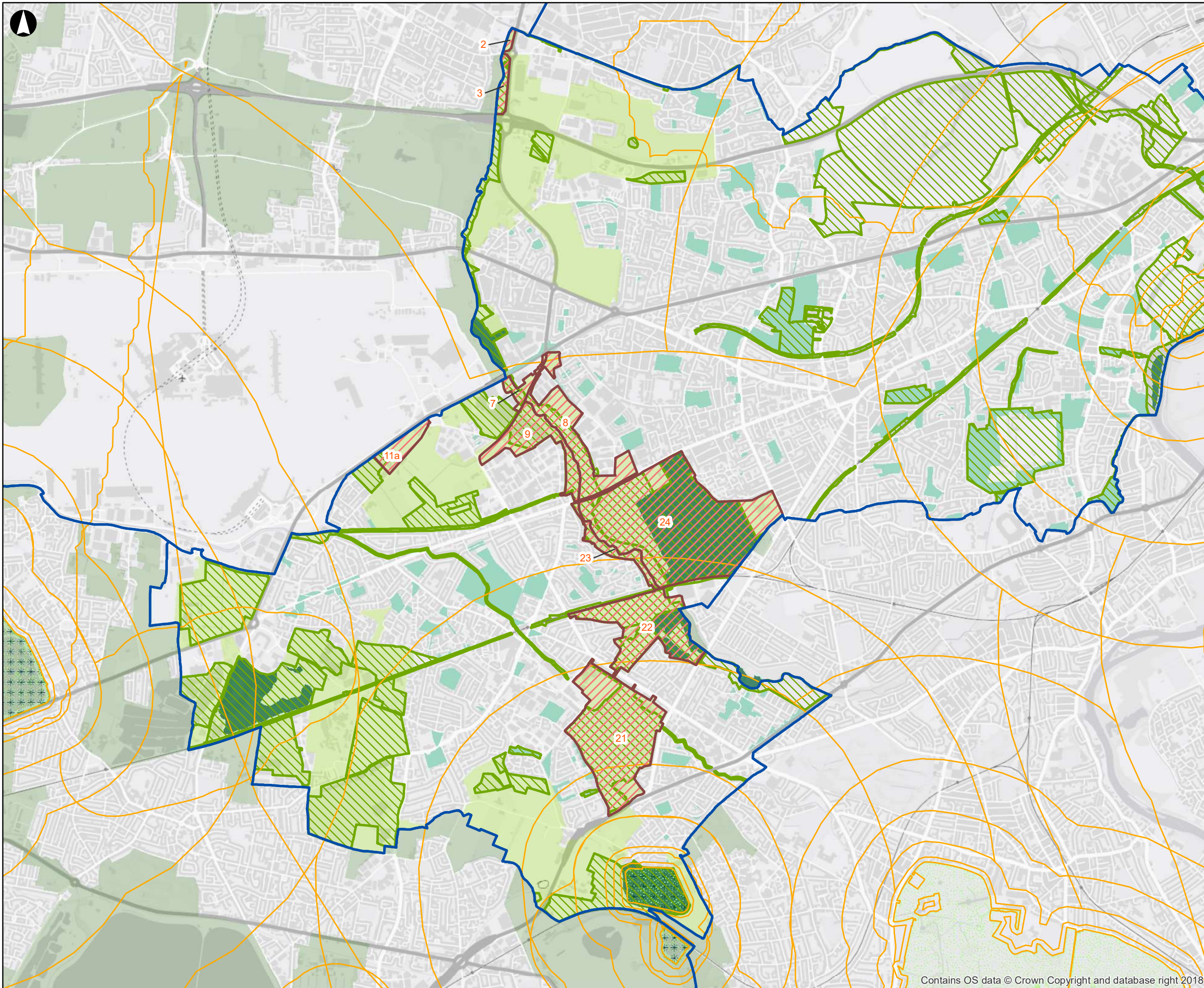
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**Figure B2.2**  
**Historical and Recreational Destinations**

Scale at A3  
**1:35,000**

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Drawing No <b>B2.2</b>	Issue <b>P1</b>
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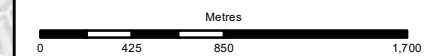


**Legend**

- Borough Boundaries
- General Areas (GBA) & sub-areas for MOL Assessment
- Neighbouring Green Belt
- Hounslow Green Belt
- Local Open Space
- Local Nature Reserves
- Sites of Importance for Nature Conservation (SINCs)
- Ramsar Sites
- Sites of Special Scientific Interest (SSSI)
- SSSI Impact Risk Zones

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**Figure B2.3**  
**Ecological Designations**

Scale at A3  
**1:35,000**

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Drawing No <b>B2.3</b>	Issue <b>P1</b>
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## Appendix C

### Glossary of Terms

## C1 Glossary of Terms and Acronyms

Term	Definition
Areas of particular local value	Weakly performing General Areas identified in the GBR Stage 1 as being of particular local importance in terms of their open space value and role as part of wider green corridors.
Blue Ribbon Network	A spatial policy covering London's waterways and water spaces and land alongside them. It includes the Thames, the canal network, the other tributaries, rivers and streams within London and London's open water spaces such as docks, reservoirs and lakes.
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.
Does not play an important role	The sub-area plays a limited role when compared with the wider General Area. Depending on context, its release may or may not have an impact upon the performance of adjoining sub-areas or the wider Green Belt.
Enclosed	Almost entirely contained or surrounded by built development which forms part of a single built-up area and has limited connections to the wider Green Belt.
Encroachment	A gradual advancement of urbanising influences through physical development or land use change.
Entire gap	A gap between settlements where development would significantly reduce the perceived or actual distance between them.
Green Chain	Areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian and cycle routes.
Green infrastructure (GI)	The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the Blue Ribbon Network but excludes the hard-surfaced public realm. This network lies within the urban environment and the urban fringe, connecting to the surrounding countryside. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole.

Term	Definition
GBR	Green Belt Review
GBR Stage 2	Stage 2 Green Belt Review
Important role	The sub-area plays a significant role when compared with the wider General Area. Depending on context, its release may or may not have an impact upon the performance of adjoining sub-areas or the wider Green Belt.
Inner boundary	Edge between the sub-area and the built-up area.
Irregular	In relation to the assessment against Purpose 1, 'irregular' boundaries are those comprising ill-defined features such as bridleway/footpath or fragmented/inconsistent tree line or hedgerow.
LBH	London Borough of Hounslow
Large built-up area	Areas defined to correspond to the major settlements identified in the respective Local Plans in Hounslow and neighbouring local authorities that border the Hounslow Green Belt and used in the NPPF Purpose 1 assessment.
Largely rural	Land with a general absence of built development, largely characterised by rural land uses and landscapes but with some dispersed development and man-made structures. Sub-area of sufficient scale 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.
Less essential part of the gap	A gap between settlements where development is likely to be possible without any risk of coalescence between them.
LNR	Local Nature Reserve
<b>Major policy constraint</b>	National or regional policy designations, which effectively rule out development of the land. The following were defined as 'major policy constraints' in this study: <ul style="list-style-type: none"> <li>• Flood zone 3b (functional floodplain)</li> <li>• Sites of international and national nature conservation importance</li> </ul>

Term	Definition
	<ul style="list-style-type: none"> <li>○ Special Protection Areas (SPAs)</li> <li>○ Special Areas of Conservation (SACs)</li> <li>○ Ramsar Sites</li> <li>○ Sites of Special Scientific Interest (SSSI)</li> <li>● Sites of Importance for Nature Conservation (SINCs)</li> <li>○ Sites of Metropolitan Importance (SMI)</li> <li>● Country Parks</li> <li>● Public safety zone.</li> </ul>
MOL	Metropolitan Open Land
NNR	National Nature Reserve (NNR)
NPPF	National Planning Policy Framework
Open land	Open land refers to land that is lacking in built development.
Openness	The extent of built development and degree to which the Green Belt can be characterised as countryside.
Outer boundary	Edge between the sub-area and further Green Belt.
Outer boundary features	Prominent man-made and natural boundary features which may also be the outer boundary edge between the sub-area and further Green Belt; or in the absence of prominent man-made and natural boundary features on the outer boundary edge, the closest boundary features of this nature which have the ability to restrict the scale of growth and regularise development form.
Partly less important	Part of the sub-area plays a limited role when compared with the wider General Area. Depending on context, the release of that part may or may not have an impact upon the performance of the adjoining sub-areas or wider Green Belt.
PROW	Public Right of Way
PPG	Planning Practice Guidance
Regular	In relation to the assessment against Purpose 1, 'regular' boundaries are those comprising well defined or rectilinear edges. Examples include:

Term	Definition
	motorway; public and man-made road; railway line; river, canal and existing development with strongly established and regular boundaries.
SINC / SMI	<p>Site of Importance for Nature Conservation</p> <p>SINCs are sites which are recognised as being of particular importance to wildlife and biodiversity.</p> <p>SINCs are divided into Sites of Metropolitan Importance for Nature Conservation (SMI), Site of Borough Importance for Nature Conservation (Grade I and Grade II) and Site of Local Importance for Nature Conservation.</p> <p>Also known nationally as Local Wildlife Sites.</p>
SNCI	<p>Site of Nature Conservation Interest</p> <p>SNCIs are sites which contain features of substantive nature conservation value at a local level.</p>
Sprawl	The outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way.
Strong unspoilt rural character	Land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.
Urban character	Land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.
Wider part of the gap	A gap between settlements where limited development may be possible without coalescence between them.