

London Borough of Richmond upon
Thames

**Green Belt, MOL, LGS and
OOLTI Review**

Final Report

Final | 31 August 2021

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 280272

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1 Introduction

1.1 Study Purpose and Context

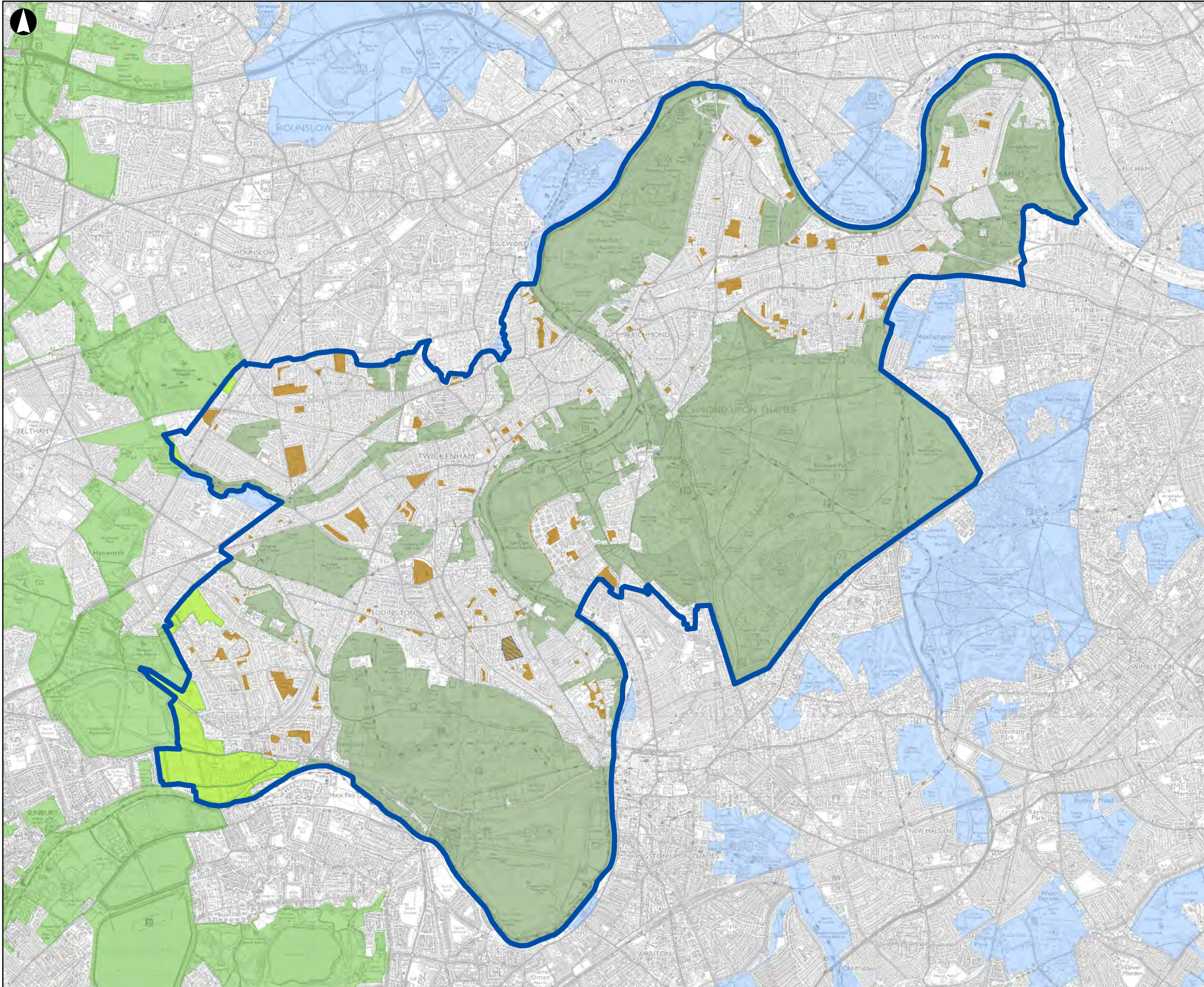
Arup has been appointed by London Borough of Richmond upon Thames (LBRuT) to undertake a review of Green Belt, Metropolitan Open Land (MOL), Local Green Space (LGS) and Other Open Land of Townscape Importance (OOLTI) within the borough (Map 1.1). Much of the borough is constrained by these policy designations. The proportion of the borough designated as Green Belt and LGS is very small. However, a significant amount of land is designated MOL, and there are many small local areas designated as OOLTI.

The LBRuT is preparing a new Local Plan. The policy designations and environmental constraints and limits that provide the context for growth in the borough mean that options for development are severely constrained. Therefore, the overall aim of this Study is to provide LBRuT with an objective and evidence-based assessment of how the currently protected areas contribute to the purposes / criteria set out in the relevant national/regional or local policy guidance.

In combination with a parallel Urban Design Study (also prepared by Arup) as well as other wider supporting technical evidence base studies including the Council's Green Space Audit (Open Space Needs Assessment), Playing Pitch Strategy, Landscape and Visual Assessment, Green Infrastructure Study, Conservation Area Character Appraisals and ecological surveys, this Study enables the Council to understand the borough's constraints and capacity for growth. The outputs and recommendations of this study form a key part of the wider supporting technical evidence base to inform the policy approach going forward within the Council's emerging Local Plan Review, including the development of the spatial strategy, and will enable the Council to take a positive approach in future plan making.

All the existing Green Belt, MOL and OOLTI has been assessed in this study. There is only one existing LGS within the borough, Udney Park Playing Fields (UPPF). This site was previously subject to examination by planning inspectors following a legal challenge. It was concluded that UPPF clearly met the LGS criteria. Therefore, this site was not subject to further assessment in this study. As part of the preparation of a new Local Plan, LBRuT has undertaken informal consultation with residents, businesses and other stakeholders. As part of this Direction of Travel consultation, respondents could identify potential sites to be considered as LGS, all of which have been considered in this study.

The borough's OOLTI, a local open space designation, includes a wide variety of private and public space, i.e. public and private sports grounds, some school playing fields, cemeteries, some larger private gardens, allotments, and areas of vegetation such as street verges and mature trees, all of which can be of great importance to the character of a neighbourhood. As referred to in the brief, given the Government's expansion of permitted development rights, this Study also sought to review which elements of the OOLTI policy are still relevant and whether the OOLTI designation applied to back garden land, for example, is still practicable.

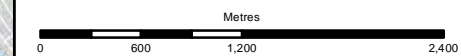


Legend

- LBRuT Green Belt
- Neighbouring Green Belt
- LBRuT MOL
- Neighbouring MOL
- LBRuT Local Green Space
- LBRuT OOLTI
- LBRuT Borough Boundary

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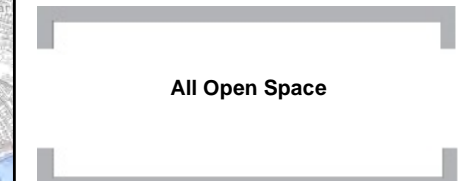


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Client
London Borough of Richmond upon Thames

Job Title
Green Belt, Metropolitan Open Land, Local Green Space and Other Open Land of Townscape Importance Review



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1.2 Role of Reviews

Role

The role of the reviews is as follows:

- **Green Belt review (GBR)** - to provide evidence of how different areas of Green Belt perform against the Green Belt purposes, as set out in paragraph 138 of the NPPF (2021). It will help the Council determine the manner and degree to which change in the Green Belt could be considered without damaging the purposes for including land in the Green Belt and the degree to which harm to the Green Belt would result if development were to take place.
- **MOL review** - to provide evidence regarding the strategic performance of MOL, assessed against the MOL designation criteria, as set out in Policy G3 of the London Plan.
- **LGS review** - to consider the potential designation of proposed LGS against the LGS criteria, as set out in paragraph 102 in the NPPF (2021).
- **OOLTI Review** - as a local designation, there is no defined or accepted role for an OOLTI review. The role of the review is nevertheless defined as being to assess the performance of OOLTI, existing or proposed, in relation to the criteria set out in the Local Plan policy LP14.

The Council will then take the findings of the reviews into account alongside other evidence in making decisions about the Local Plan strategy, site allocations and ultimately possible alterations to open space designations / boundaries.

Limitations

This review is not a policy or decision-making document that confers the release of Green Belt land, MOL or OOLTI land, nor the designation of new LGS; however, it is an important part of LBRuT's evidence base. It will be for the Council to ultimately make any final decisions regarding the future designation of open space within the borough taking into account all of the Local Plan evidence base and the spatial vision and objectives for the LBRuT.

Open space designations will not be the only consideration when developing the spatial strategy and assessing the suitability and deliverability of sites identified for allocation in LBRuT's new local plan. The Council will not be precluded from allocating highly performing Green Belt or MOL sites for development, for example, if other factors in favour of the site outweigh this consideration. Equally weakly performing Green Belt or MOL will not necessarily be released, if the balance of planning factors does not support the use of this land for development. As clearly stated in policy and supported through case law, these designations are intended to be permanent and if this land is to be released, it will be necessary for the Council to demonstrate exceptional circumstances at both as strategic and site levels.

With regards to Green Belt and MOL, there is no clear definition of what amounts to exceptional circumstances to justify alterations of the Green Belt and MOL

boundary. However, case law and Local Plan EIP precedents suggest that any justification must be responsive to local conditions. Examples of such factors used to justify release of Green Belt and MOL include 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 to increase the supply of affordable housing.

A GBR or MOL review does not set out exceptional circumstance arguments, which will need to be demonstrated at the strategic and at site level if the Council proposes release of land in accordance with the NPPF/ London Plan. Although the outcomes from a review will form part of any exceptional circumstances case presented by the Council to support alterations.

This Study forms part of a suite of supporting technical evidence base studies which will be used by the Council to help inform and shape policy formulation and the spatial planning approach taken to green space within the emerging Local Plan Review. To ensure a robust and transparent approach, the Council will balance the outcomes and recommendations from this Study with the wider technical evidence base, taking into account all policy priorities including the value of green and blue infrastructure networks and the need to address open space deficiencies. Whilst it is not the role of this Study to consider the function of individual Green Belt, MOL, LGS and OOLTI green spaces within wider ecological networks, river and wildlife corridors, stepping-stone wildlife sites and landscape-scale green infrastructure (both green and blue infrastructure) within the borough, this is an important consideration (as highlighted in paragraphs 174, 175 and 179 of the National Planning Policy Framework (NPPF, 2021)). This will be given due consideration by the Council in other evidence base studies and their policy formulation.

1.3 Structure

The review is structured as follows:

- The context for the study is presented in Section 2, including the implications from analysis of planning policy, guidance, legal precedents and experience elsewhere for open space reviews. The full analysis can be found in Appendix B.
- A summarised methodology, key findings and recommendations for each of the reviews is set out in Section 3 for Green Belt, Section 4 for MOL, Section 5 for LGS and Section 6 for OOLTI. The full methodologies are presented in Appendix C, including the Duty to Cooperate comments and subsequent amendments.
- Overarching conclusions are presented in Section 6.

A Glossary is provided at Appendix A.

Accompanying Annex Reports contain the assessment pro forma for each of the reviews.

2 Context

2.1 Borough Open Space Context

Map 1.1 illustrates the key open space designations that currently apply in the borough, i.e., Green Belt, MOL, LGS and OOLTI.

The coming of railways and then the car prompted an expansion of suburbia. For London, the response to this was the Green Belt (London and Home Counties) Act 1938. An Act to make provision for the preservation from industrial or building development of areas of land in and around the administrative county of London. This empowered Local Authorities to buy land to keep it open as Green Belt. The aims and purposes of Green Belt are set out in the NPPF (2021).

Some 140ha, a very small proportion of the borough (2.29%), is designated as Green Belt. This Green Belt land is located to the south western and western tips of the Borough and adjoins neighbouring Green Belt in Hounslow, Spelthorne and Elmbridge (where it is divided by the River Thames). The largest area of Green Belt is located at the Borough's south western tip and encompasses the Hampton Water Treatment Works. While the parcels running north contain playing fields and recreation grounds.

Some land at Twickenham and Fulwell golf courses is held under the 1938 Green Belt Act. Under this Act owners are required to request permission from the Secretary of State to build on or dispose of this land. This requirement is separate from and in addition to any requirements for planning permission. Most of this land (i.e. at Twickenham and Fulwell golf courses) is protected in the adopted Local Plan by its designation as MOL.

The MOL designation is unique to London and protects strategically important open spaces within the built environment. It was introduced in the 1969 Draft Greater London Development Plan as a protective designation for open land within the urban area. It was recommended that parks, woodlands, golf courses, nursery gardens, cemeteries and other open land which might otherwise be at risk of development should receive this designation. The aim and criteria for MOL are set out in the London Plan.

MOL plays an important role as part of the borough's and London-wide green infrastructure network. It is open land or water, either publicly or privately owned and with or without public access. While Green Belt land in the borough is limited, a significant proportion of the borough is designated MOL (51.9%), which includes the borough's large green spaces including Richmond Park, Bushy Park and Kew Gardens. There is also a substantial proportion of MOL covering the River Thames and watercourses, as well as the surrounding linear green spaces.

The contribution of MOL is considered as vital as Green Belt and therefore it is protected as a permanent feature and the policy guidance of NPPF on Green Belt applies equally to MOL.

The concept of LGS was introduced in the 2012 NPPF and has been retained in the 2021 NPPF, which sets out its purpose and designation criteria. The designation of land as Local Green Space is a way to provide special protection against inappropriate development for open spaces which are of particular importance to communities. The NPPF requires that policy for the management of these designations should be consistent with those for Green Belt.

There is only one LGS designation in the borough, Udney Park Playing Fields (UPPF), Teddington. As mentioned in section 1.1, this site was previously subject to examination by planning inspectors on two separate occasions. It was concluded that the UPPF clearly met the LGS criteria, citing the UPPF's local significance both historically and ecologically. On this basis, the site was adopted as part of the Local Plan in March 2020.

Areas designated as OOLTI are part of a longstanding policy approach to protect open land of local importance in the borough, introduced in policy in the 1985 Local Plan. Criteria for the designation of OOLTI were introduced in the Development Management Plan, adopted in 2011.

In some parts of the borough, open areas, which are not extensive enough to be defined as Green Belt or MOL, act as pockets of greenery of local rather than London-wide significance. Many of these are of townscape importance, contributing to the local character and valued by local residents as open spaces within the built-up area.

OOLTI covers 2.26% of the borough and comprises a range of 168 small local areas. Areas include public and private sports grounds, some school playing fields, cemeteries, some larger private gardens, allotments and areas of vegetation, such as street verges and mature trees. They form an important part of the multi-functional network of Green Infrastructure.

2.2 Policy, Guidance and Experience Elsewhere Context

This section establishes the context for conducting GB, MOL, LGS and OOLTI reviews. There is no defined method for carrying out such reviews, therefore it is helpful to explore planning policy relating these designations, as well as reviewing experience elsewhere in terms of other reviews and legal precedents. Appendix B sets out the full review of these sources and the following sub-sections set out the resultant key implications for the methodologies employed in this study.

2.2.1 Implications for Green Belt Review

- Overarching policy for Green Belt is set out in the NPPF (2021).
- There is no Government defined methodology for carrying out a Stage 1 GBR and local authorities have therefore taken a variety of approaches to-date.
- A staged approach to Green Belt assessment is supported. Stage 1 GBR focus on the entirety of the Green Belt within an authority, dividing the Green Belt

into strategic parcels for assessment. Some authorities assess the strategic as well as local roles of the Green Belt in a Stage 1 GBR.

- Green Belt should be assessed against the purposes set out in the NPPF¹ 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.²
- Authorities have used only those purposes deemed relevant to the local context and key terms in relation to interpreting national purposes have been defined. Qualitative approaches are primarily used in assessments.
- Green Belt assessment should take account of good practice advice and comparator studies.³
- Changes to Green Belt are not generally supported by the NPPF, as the general extent has already been established and given Green Belt's intended permanence. Any proposed changes will need to be supported by a robust exceptional circumstances case, which is fully justified and evidenced. The GBR will only provide the starting point and it will be necessary for the Council to develop the exceptional circumstances case, both at strategic and site level, as part of the wider Local Plan process.⁴
- Openness and permanence are key considerations in terms of Green Belt; and are therefore integral to the assessment of Green Belt across all purposes⁵.
- Various planning appeals have highlighted important considerations around the interpretation and importance of 'openness of the Green Belt' and therefore how this is applied in a Green Belt assessment (or a MOL review).⁶
- Openness is generally considered to be 'land free from built development', which should be assessed on an individual area basis as well as in terms of the cumulative impact on adjacent areas⁷.
- 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

¹ NPPF (2021) paragraph 138, London Plan (2021) Policy G2; PAS (2015) Planning on the Doorstep: The Big Issues; experience elsewhere, including neighbouring authorities

² 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*

³ Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

⁴ NPPF (2021) paragraph 140

⁵ National Planning Policy Framework (2019) paragraph 133; and Mel Middleton, Inspector (December 2017) *Note – Green Belt Review, Independent Examination of the Welwyn Hatfield Local Plan*.

⁶ Planning Inspectorate (2018) Appeal Ref: APP / P1940/W/17/3183388 – Clovercourt Ltd v Three Rivers District Council; The Planning Inspectorate (2018) Appeal Ref: APP/ A0665/ W/ 17/ 3190601 – Clegg v Cheshire; 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; Planning Practice Guidance (2021)

⁷ 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

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)⁸.

- Recent Independent Examinations⁹ have highlighted: the importance of assessing openness as opposed to landscape; the need for assessments to consider local circumstances when determining essential areas to retain; and the need for assessments to focus on assessing Green Belt against the NPPF purposes, with robust rationale presented if any purpose is to be excluded.
- When assessing whether an area can be removed from the Green Belt, consideration should be given to the presence or otherwise of readily recognisable and likely to be permanent boundary features¹⁰.
- Enhancement to Green Belt and compensatory improvements to quality and accessibility to remaining Green Belt to offset any loss of Green Belt is encouraged.¹¹

2.2.2 Implications for Mol Review

- Overarching MOL policy is established through the London Plan, which requires boroughs to designate the extent of MOL in their Local Plans with any changes to the existing boundaries to be undertaken through the plan led process.
- The London Plan further states that MOL and Green Belt should be accorded equal status and that the principles of national Green Belt policy should apply to MOL.
- There is no Government defined methodology for carrying out a MOL review and local authorities have therefore taken a variety of approaches to-date.¹²
- Assessing MOL against the designation criteria set out in the London Plan appears to be an acceptable approach, (in a similar vein to the way that Green Belt should be assessed against the purposes set out in the NPPF) and, if any criteria is to be excluded, there must be a robust rationale. Any methodology must clearly set out how the criteria have been interpreted and should respect the local context.¹³
- Openness and permanence are key considerations in terms of features of MOL; and are therefore integral to the assessment of MOL across all criteria. Therefore, the implications identified above for Green Belt with regards to openness, equally apply to MOL.

⁸ Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin).

⁹ Mel Middleton, Inspector (December 2017) *Welwyn Hatfield Local Plan Examination Green Belt Review*; 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*

¹⁰ NPPF (2021) paragraph 143

¹¹ NPPF (2021) paragraph 142, London Plan (2021) Policy G2, Local Plan (2018) Policy LP13, PPG (2021)

¹² Experience elsewhere across London.

¹³ London Plan (2021) Policy G3, Experience elsewhere across London

- Changes to the boundaries or extent of MOL are not supported by the London Plan. Any proposed changes will need to be supported by a robust case, which is fully justified and evidenced. The MOL review will only provide the starting point and it will be necessary for the Council to develop the exceptional circumstances case as part of the wider Local Plan process. An argument for exceptional circumstances cannot rest on the poor-quality nature of designated land.¹⁴
- Improvements to the quality of MOL are supported. A MOL review offers an opportunity to identify where such improvements are required.¹⁵

2.2.3 Implications for LGS Review

- Overarching policy for LGS is set out in the NPPF (2021).
- The PPG states that an LGS designation ‘is a way to provide special protection against development for green areas of particular importance to local communities.’ It states that the designation gives the land protection consistent with Green Belt, but otherwise conveys no other restrictions or obligations on the landowner.
- The Government has not set out a standard methodology or template for the assessment of areas proposed as Local Green Space.
- The NPPF provides initial guiding principles around which the Local Green Space designation should be formed, including three key criteria:
 - Reasonably close proximity to the community it serves.
 - Demonstrably special to a local community.
 - Local in character, not an extensive tract of land.
- The NPPF states five examples of how a green space may be ‘demonstrably special to a local community’:
 - Beauty
 - Historic significance
 - Recreational value
 - Tranquillity
 - Richness in wildlife

However, it leaves local interpretation of these criteria and the approach to the scoring of sites to the Local Authority.

- Additional considerations may be included by Local Planning Authorities when determining whether a site should be designated as a Local Green Space,

¹⁴ London Plan (2021) Policy G3

¹⁵ London Plan (2021) Policy G3

for example, if covered by existing designations / criteria, then it may be excluded from the selection process.

2.2.4 Implications for OOLTI Review

- Overarching policy for OOLTI is set out the Richmond Local Plan.
- Areas designated as OOLTI are part of a longstanding local policy approach to protect open land of local importance in this borough.
- The designation applies to green spaces which may not be extensive enough to be defined as green belt or MOL, acting as pockets of greenery of local rather than London-wide significance. These spaces do not necessarily have to be publicly accessible.
- The criteria used to define OOLTI in Policy LP 14 highlights the need to consider townscape importance, contribution to local character and value to local residents for its presence and openness in the built-up area. Furthermore, OOLTI should contribute to a network of green spaces and green infrastructure and be of value for biodiversity and nature.

3 Green Belt

3.1 Methodology

The Green Belt and MOL assessments followed parallel but complementary workstreams which are summarised in Sections 3.1.1 and 4.1.1 respectively. Full details of the assessment processes can be found in Appendix C1.

3.1.1 Green Belt Assessment

A stepped approach was undertaken for this study as follows.

- Step 1 identified that all of the borough's Green Belt should be reviewed through this Study.
- Step 2 defined two tiers of Green Belt Land for assessment:
 - 1) Strategic Areas – identified largely through commonalities in landscape character and natural constraints or barriers that distinguish between different parts of the Green Belt, and functional connections with the wider Metropolitan Green Belt.
 - 2) General Areas – more granular parcels for assessment using physical features that are readily recognisable and likely to be permanent.
- Step 3 - all General Areas were visited to understand their context, character and boundary features.
- Step 4 – a Strategic Green Belt Assessment was undertaken as well as the assessment of the performance of the General Areas against the NPPF purposes.

The NPPF (2021) sets out five Green purposes (paragraph 138). However, purposes 4 and 5 were not deemed relevant in the Richmond context. Purpose 4, 'to preserve the setting and special character of historic towns', was excluded as none of the settlements within the borough within close proximity to the Green Belt meet the definition of a historic town. While for purpose 5, 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'; it is difficult to distinguish the individual contribution that a single parcel of land makes to encouraging the re-use of urban land and so this purpose was not considered. The Green Belt was thus assessed against purposes 1-3:

- to check the unrestricted sprawl of the large built-up areas,
- to prevent neighbouring towns merging into one another, and
- and to assist in safeguarding the countryside from encroachment

3.2 Key Findings

3.2.1 Strategic Green Belt Assessment

The Strategic Green Belt Assessment focusses on two aspects, which are assessed at a high level against the NPPF purposes 1-3:

(1) The performance of the Strategic Area A in relation to the wider sub-regional context of the Metropolitan Green Belt

Strategic Area A (see Appendix C, Map C1.3) forms part of a narrow and fragmented band of Green Belt which closely abuts the edge of south-west London. This strategically important arc of green spaces can be traced from Heathrow Airport through to Epsom and provides a narrow break between the built-form of outer London and the Surrey towns of Ashford, Sunbury-on-Thames (Spelthorne), Walton-on-Thames / Hersham, Esher and Claygate (Elmbridge). In some cases, the outer London suburbs constitute areas both within the London boundaries and settlements outside which have coalesced; one example is Surbiton (RB Kingston), which has coalesced with Molesey and Thames Ditton (Elmbridge). In the northern part of the Area, a continuous swathe of Green Belt (although very narrow in places) continues to separate London from Surrey (Ashford and Sunbury-on-Thames, Spelthorne). The Heathrow site extends some way out into the Green Belt, limiting the northern extent of this arc.

As a result of rapid and weakly controlled development during the late 19th and early part of the 20th centuries, this network of Green Belt is narrow and frequently punctuated by areas of built-form. Much of the openness that remains is maintained by man-made lakes and reservoirs located around the Thames Valley (some of which are the result of historic sand and gravel extraction), water treatment works, a gas works and various small-scale park areas. Despite its fragmentation, it is the only remaining open / undeveloped area preventing the coalescence of Greater London with Surrey.

At a high level, Strategic Area A, as part of this broad sub-regional network, is likely to meet Green Belt Purposes 1 and 2 of the NPPF strongly, acting to restrict the further sprawl of the Greater London built-up area and prevent the coalescence of the Greater London built-up area with other distinct towns in Surrey as well as acting to maintain separation between the Surrey towns themselves.

The northern part of the Strategic Area falls within the influence of the River Thames and its tributaries. It is characterised by a very diverse landscape, generally dominated by hydrological features, which has seen substantial change throughout the 18th and 19th centuries as a result of surrounding urbanising pressures. This part of the Strategic Area is low lying and relatively flat, forming the wider flood plain of the River Thames and its tributaries. Historically, the Thames floodplain consisted of agriculture, meadows and market gardens. Remnants of these features remain scattered across the Strategic Area. In particular, pockets of agriculture are prevalent to the east of Stanwell and to the north of Sunbury-on-Thames. However, the natural character of this area has gradually been compromised by urban influences.

This urban feel is prevalent across much of the Strategic Area, partially as a result of the proximity and density of surrounding development, which contributes to a limited sense of remoteness and rurality; in some cases, this is also down to the general prevalence of land uses more associated with the urban fringes. These are dispersed throughout much of the area and include: Kempton Park Racecourse; various urban managed parks, sports clubs and playing fields, Princes Lakes, an area of man-made water bodies formed from former gravel workings, and small

industrial units and storage sites. While the Strategic Area together can be viewed as a network of open spaces within an urban context, the dense road and rail network throughout serves to compartmentalise the area into smaller pockets, creates a feeling of ‘patchiness’. The Strategic Area as a whole therefore scores less strongly against Purpose 3.

In summary, Strategic Area A plays an important role in meeting the fundamental aim of Green Belt policy to prevent urban sprawl by keeping land permanently open. Assessment of Strategic Area A against the relevant NPPF purposes is as follows:

- **Purpose 1** – Meets the Purpose **very strongly** by acting as an important barrier to potential sprawl from the Greater London built-up area (including Feltham and Hampton) and a number of built-up areas within Surrey (Ashford / Sunbury-on-Thames / Stanwell).
- **Purpose 2** – Meets the Purpose **very strongly** by establishing important gaps between Greater London and a number of Surrey towns.
- **Purpose 3** – Meets the Purpose **weakly** due to the fragmented nature of the Green Belt and the prevalence of man-made/utilities uses.

(2) Contribution of LBRuT Green Belt within the Strategic Area A.

The entirety of LBRuT’s Green Belt falls within the north eastern edge of Strategic Area A (see Map C1.3).

To the north, Strategic Area A is surrounded by the Greater London Built-up area so has a limited role in preventing its outward sprawl. Furthermore, as a result of the modest scale of Green Belt land within LBRuT, the neighbouring Green Belt land within LB Hounslow is considered to perform a stronger role within the context of the Strategic Area in terms of preventing the merging of Whitton and Feltham (Purpose 2).

Moving further south, the Green Belt land within LBRuT performs a strong role within the context of Strategic Area A in preventing the sprawl of the Greater London built-up area (Purpose 1) towards Surrey. Together with more substantial areas of neighbouring Green Belt in Spelthorne, LBRuT Green Belt also serves to prevent the merging of settlements including Hanworth and Hampton Village and Sunbury-on-Thames and Hampton Village (Purpose 2).

The southern part of Green Belt land within LBRuT forms almost the entire part of Strategic Area A in this location and therefore makes a very strong contribution in preventing the outward sprawl of Greater London and Ashford/ Sunbury-on-Thames/ Stanwell (Purpose 1), as well as forming the entire gap between Hampton Village, Molesey and Sunbury-on-Thames (Purpose 2).

With regards to Purpose 3, Green Belt across LBRuT has in parts been compromised by urban influences (particularly within the southern part) and is considered to reflect the fragmented nature of the wider Strategic Area A.

Overall, the northern swathe of Green Belt within LBRuT is considered to play a lesser role in preventing sprawl (**Purpose 1**) and the merging of neighbouring

settlements (**Purpose 2**) compared to the Green Belt within LBRuT further south. With regards to **Purpose 3**, the Green Belt land to the north of LBRuT has a more rural character and therefore plays a greater role in meeting Purpose 3 compared to the Green Belt land to the south which generally has a higher concentration of built form and urbanising influences.

3.2.2 General Area Assessment

This section summarises the key findings from the assessment of the five General Areas against the NPPF purposes (1 – 3) and recommendations for each General Area. The detailed proformas setting out the assessments for each General Area can be found in the Annex Report.

3.2.2.1 Purpose 1 Assessment

The Purpose 1 assessment considers the role of the General Area in preventing the sprawl of London but also in restricting the sprawl of large built-up areas within adjacent neighbouring local authorities. Criterion (a) assessment considers on a ‘pass/fail’ basis whether the General Area protects open land at the edge of one or more discrete large built-up area(s) and criterion (b) assessments considers the extent to which a General Area prevents sprawl.

3.2.2.2 Criterion 1a Assessment

The findings of the Purpose 1a assessment are presented in Map 3.1. All five General Areas are located at the edge of one or more large built-up areas (Greater London and/ or Ashford/ Sunbury-on-Thames/ Stanwell) and therefore pass Purpose 1a.

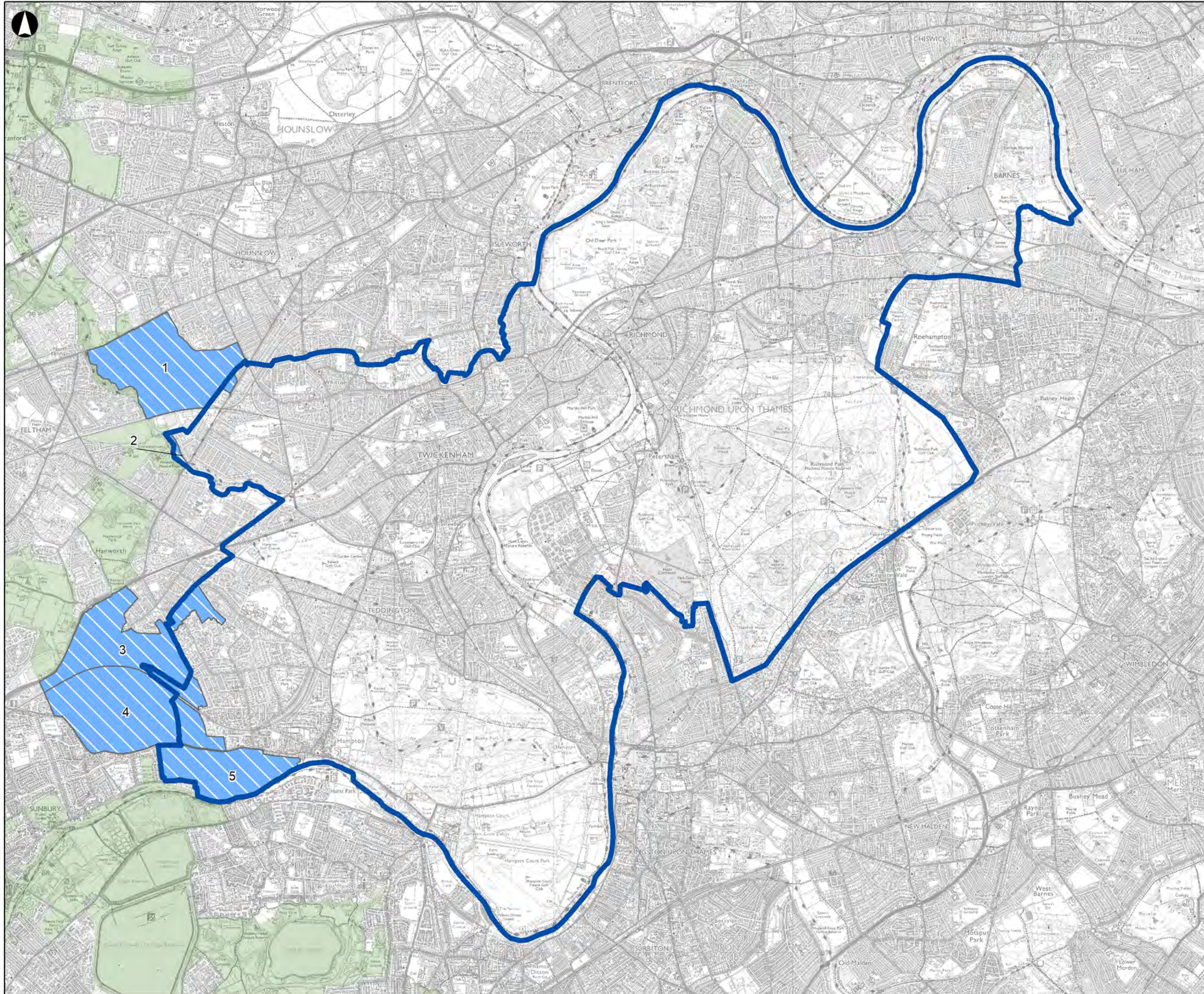
3.2.2.3 Criterion 1b Assessment

The findings of the Purpose 1b assessment are presented in Map 3.2. Three of the General Areas to the south west of the borough were identified as performing very strongly against Purpose 1b since they are contiguous with the large built-up areas of Greater London and Ashford/ Sunbury-on-Thames/ Stanwell, preventing their outward sprawl. To the west of the borough, one General Area was assessed as playing a moderate role in preventing sprawl of the Greater London large built-up area and one General Area was identified as being enclosed within the Greater London built-up area and therefore doing little to prevent sprawl (i.e. score 1).



3.2.2.4 Purpose 2 Assessment

The Purpose 2 assessment considers the role of the General Area in preventing neighbouring towns from merging and therefore protecting existing gaps between towns, as well as maintaining the existing settlement pattern.



The findings of the Purpose 2 assessment are presented in Map 3.3. Four of the General Areas form the entire gap between settlements and are therefore identified as performing very strongly. One General Area plays a very limited role in preventing settlements from merging as a result of its relatively small scale within a wider gap.



Legend

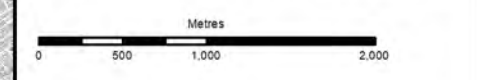
-  LBRuT Borough Boundary
-  Neighbouring Green Belt

Purpose 1 Criteria (a) Scores

-  Fail
-  Pass

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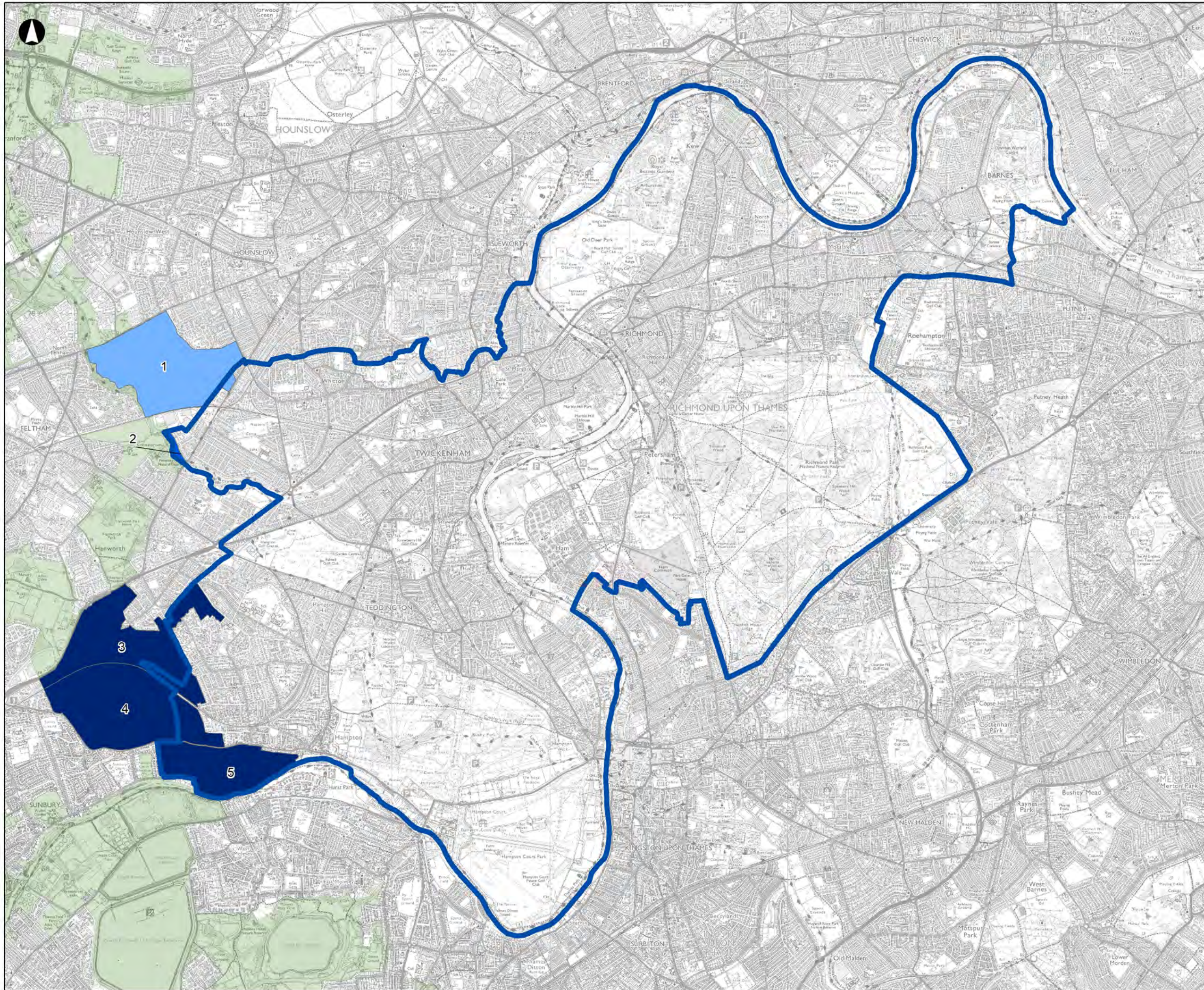
Client
London Borough of Richmond upon Thames

Job Title
Green Belt Review

Green Belt - Purpose 1 Criteria (a) Scores

Scale at A3
1:45,000

Job No 280272-00	Drawing Status Issue
Drawing No 3.1	Issue P1



Legend

- LBRuT Borough Boundary
- Neighbouring Green Belt

Purpose 1 Criteria (b) Scores

- N/A
- 1
- 1+
- 3
- 3+
- 5
- 5+

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Green Belt - Purpose 1 Criteria (b) Scores

Scale at A3
1:45,000

Job No 280272-00	Drawing Status Issue
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Drawing No 3.2	Issue P1
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3.2.2.5 Purpose 3 Assessment

The Purpose 3 assessment considers the role of the General Area in safeguarding the countryside from encroachment, or a gradual advancement of urbanising influences through physical development or land use change.

The findings of the Purpose 3 assessment are presented in Map 3.4. One General Area was identified as performing strongly due to the limited presence of built form and rural character. One General Area was identified as performing moderately and two were identified as performing weakly. One General Area was assessed as performing very weakly due to the high coverage of built form and urban character.

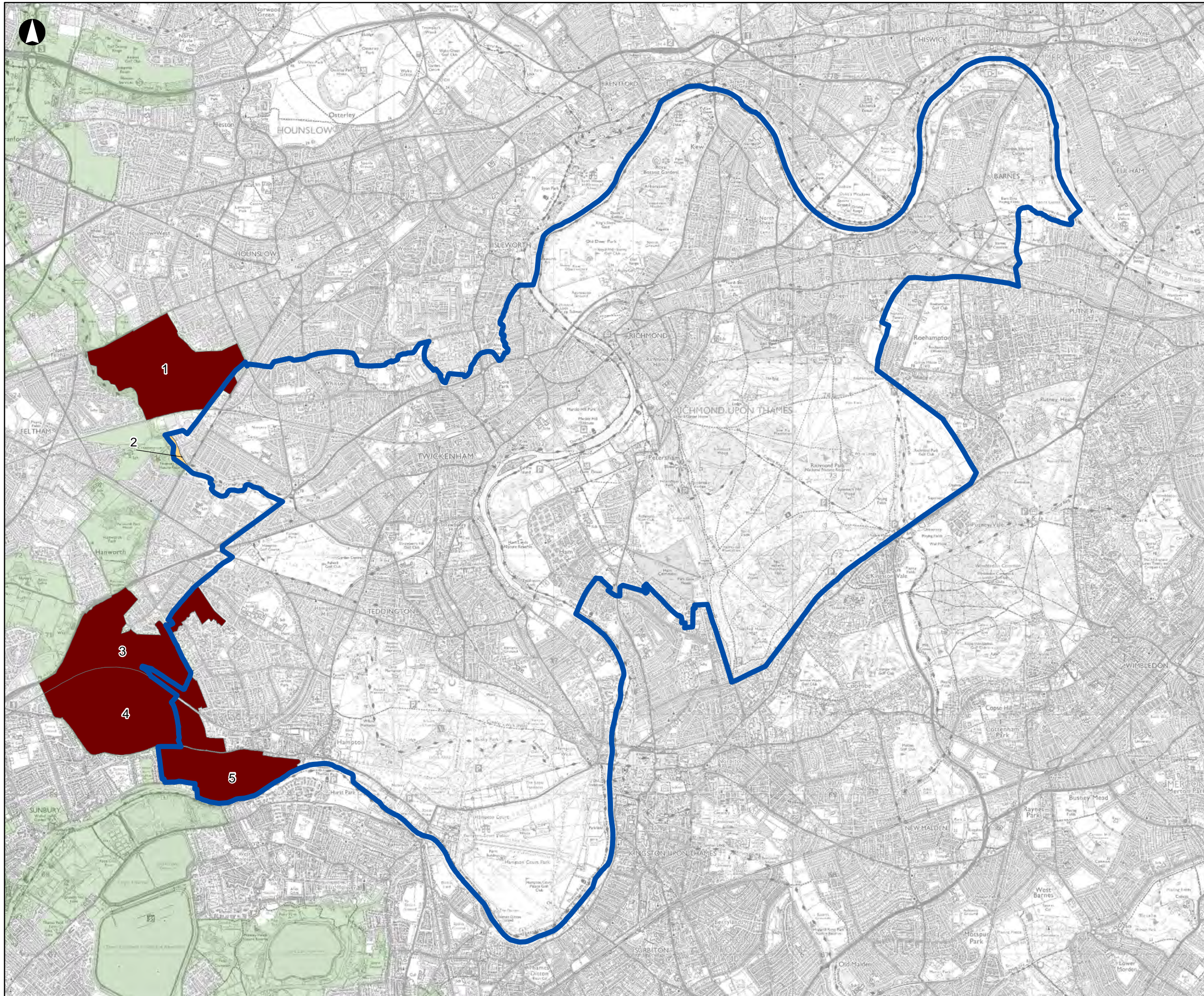
3.2.3 Overall Performance

The overall performance against the purpose assessment criteria was determined for each General Area, with results presented in Map 3.5. All General Areas scored very strongly (5) against the criteria for one or more of the NPPF purposes and were therefore all judged to meet the purpose assessment criteria strongly overall.



3.3 Recommendations

No weaker performing General Areas or smaller scale sub-areas within these have been identified. On this basis it is recommended that no areas are taken forward for further assessment.





The Council should take this recommendation into account alongside other evidence in making decisions about the Local Plan strategy, site allocations and ultimately possible alterations to Green Belt boundaries.



Legend

-  LBRuT Borough Boundary
-  Neighbouring Green Belt

Purpose 2 Scores

-  0
-  1
-  3
-  5

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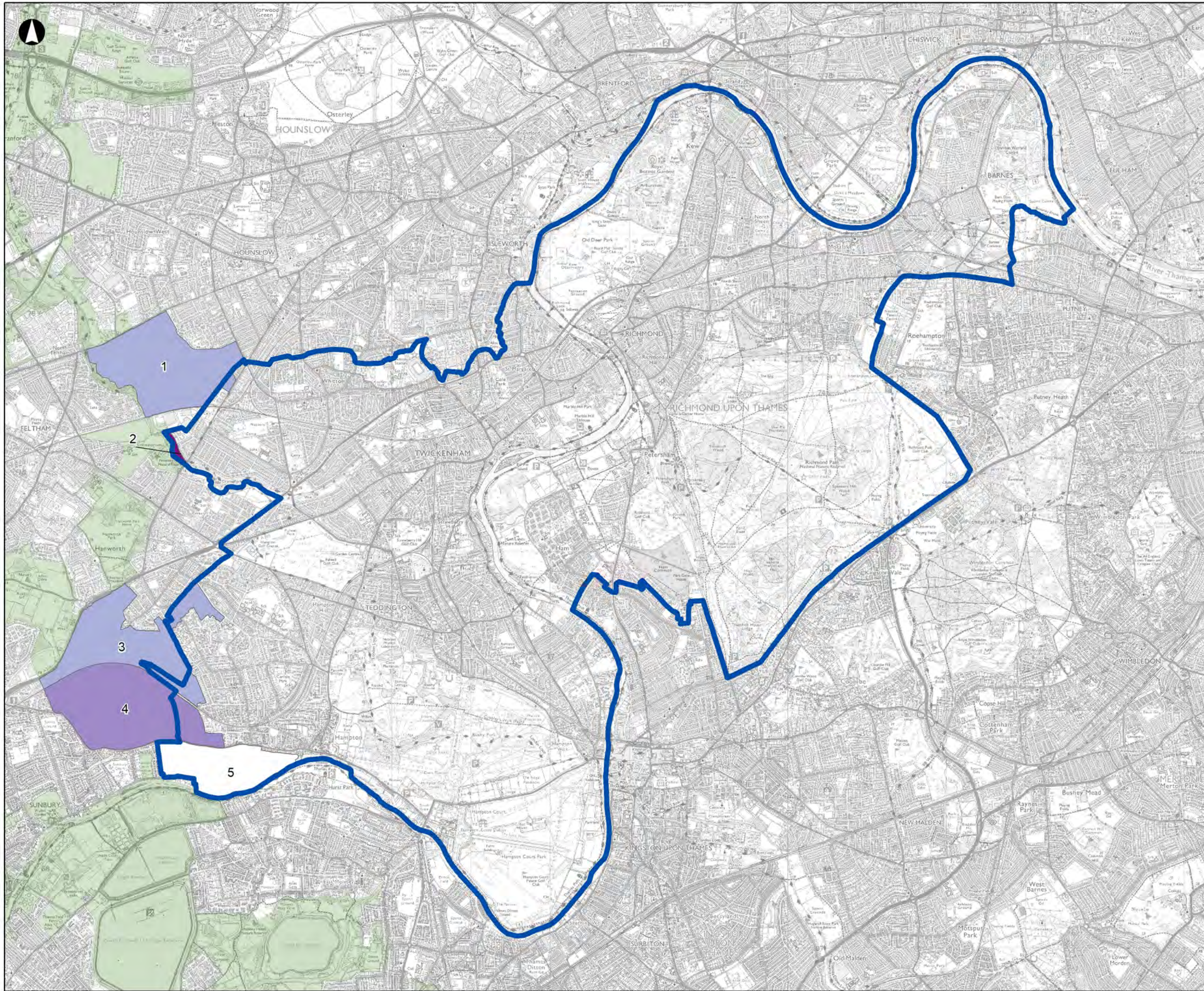
Green Belt - Purpose 2 Scores

Scale at A3
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Job No 280272-00	Drawing Status Issue
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Drawing No 3.3	Issue P1
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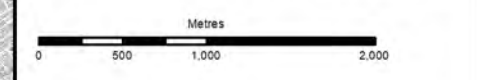


Legend

-  LBRuT Borough Boundary
 -  Neighbouring Green Belt
- Purpose 3 Scores**
-  0
 -  1
 -  2
 -  3
 -  4
 -  5

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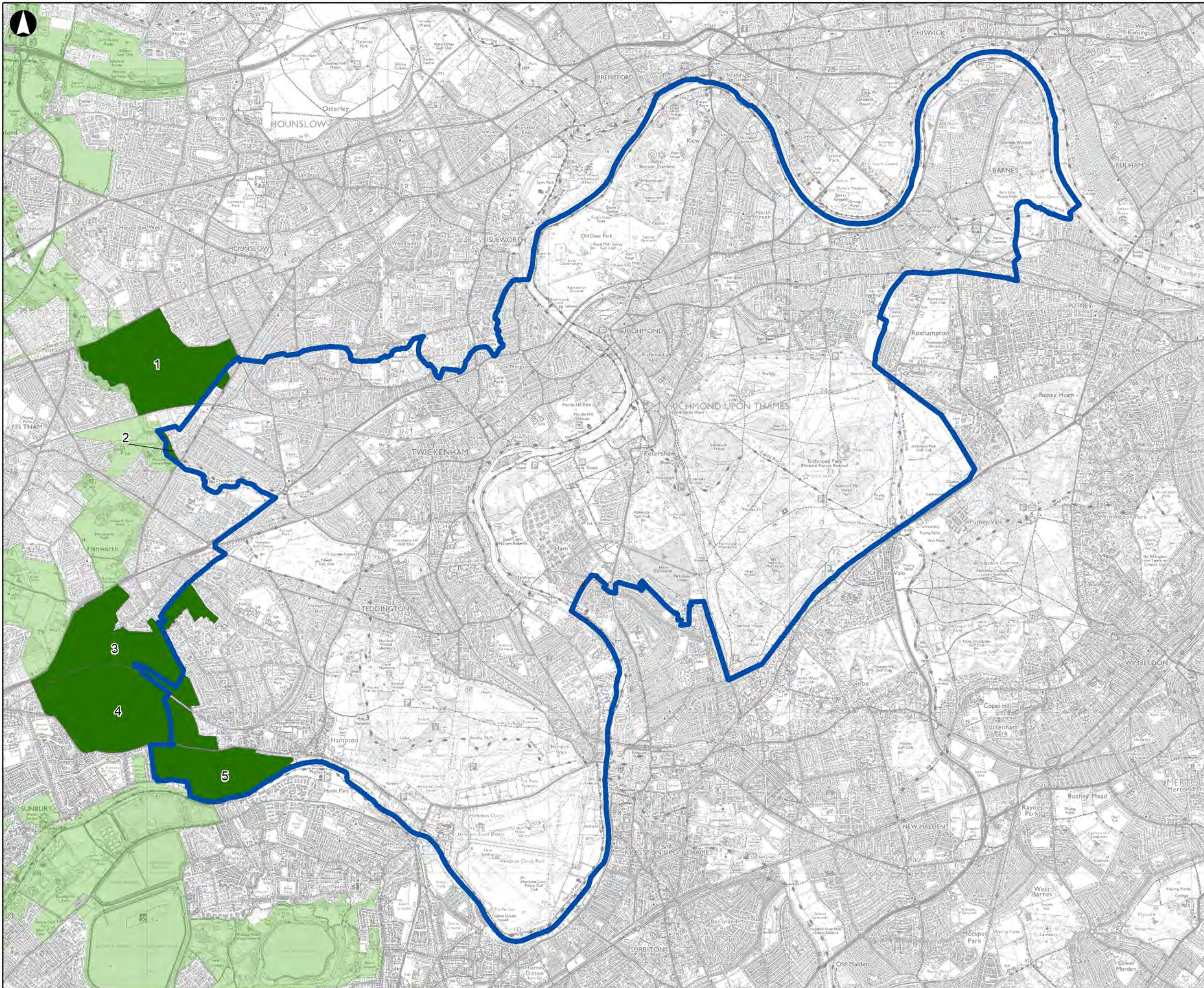
Client
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Job Title
Green Belt Review

Green Belt - Purpose 3 Scores

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Job No 280272-00	Drawing Status Issue
Drawing No 3.4	Issue P1



Legend

- LBRuT Borough Boundary
- Neighbouring Green Belt

Overall Performance

- Strong
- Moderate
- Weak

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Job Title
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Green Belt - Overall Performance

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Job No 280272-00	Drawing Status Issue
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Drawing No 3.5	Issue P1
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4 MOL

4.1 Methodology

The Green Belt and MOL assessments followed parallel but complementary workstreams which are summarised in Sections 3.1.1 and 4.1.1 respectively. Full details of the assessment processes can be found in Appendix C1.

4.1.1 MOL Assessment

A stepped approach was undertaken for this study as follows.

- Step 1 identified all of the borough's MOL, which was reviewed through this Study.
- In line with the NPPF, Step 2 defined the MOL General Area boundaries for assessment using physical features that are readily recognisable and likely to be permanent.
- All MOL General Areas were visited to understand their context, character and boundary features (Step 3).
- At Step 4, the performance of the MOL General Areas was assessed against the London Plan MOL criteria.

The London Plan (2021) sets out four MOL criteria (policy G3). The MOL General Areas were assessed against criteria 1-3 and where a General Area was judged to meet one of these criteria, additionally against criterion 4:

- Criterion 1. It contributes to the physical structure of London by being clearly distinguishable from the built-up area.
- Criterion 2. It includes open area facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve the whole, or significant parts, of London.
- Criterion 3. It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value.
- Criterion 4. It forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

4.2 Key Findings

This section summarises the key findings from the assessment of the forty-nine MOL General Areas against the London Plan Criteria (1 – 4) and recommendations for each MOL General Area.

The detailed proformas setting out the assessments for each MOL General Area can be found in the Annex Report.

4.2.1 Criterion 1 Assessment

Criterion 1 assessed the extent to which the General Area contributes to the physical structure of London by being clearly distinguishable from the built-up area, including offering a sense of openness and absence of development.

The findings of the Criterion 1 assessment are presented in Map 4.1. Most of the General Areas were identified as performing moderate (3), moderate-strong (4) or strong (5), due to their absence from development, often forming part of the River Thames or River Crane corridor, or large standalone green spaces, resulting in a notable contribution to the structure of London.

Four General Areas were identified as performing weak-moderate (2). Whilst built development was generally absent, the small size of the area itself and/or lack of screening resulted in built development being notable in multiple areas, resulting in only a local contribution to the physical structure of London. The General Areas included small urbanised rivers and small standalone green spaces.

Two General Areas were identified as performing weak (1), small front gardens, with unscreened adjacent residential development and an A road, resulting in urbanising influences affecting the majority of the General Area therefore making no contribution to the physical structure of London.

4.2.2 Criterion 2 Assessment

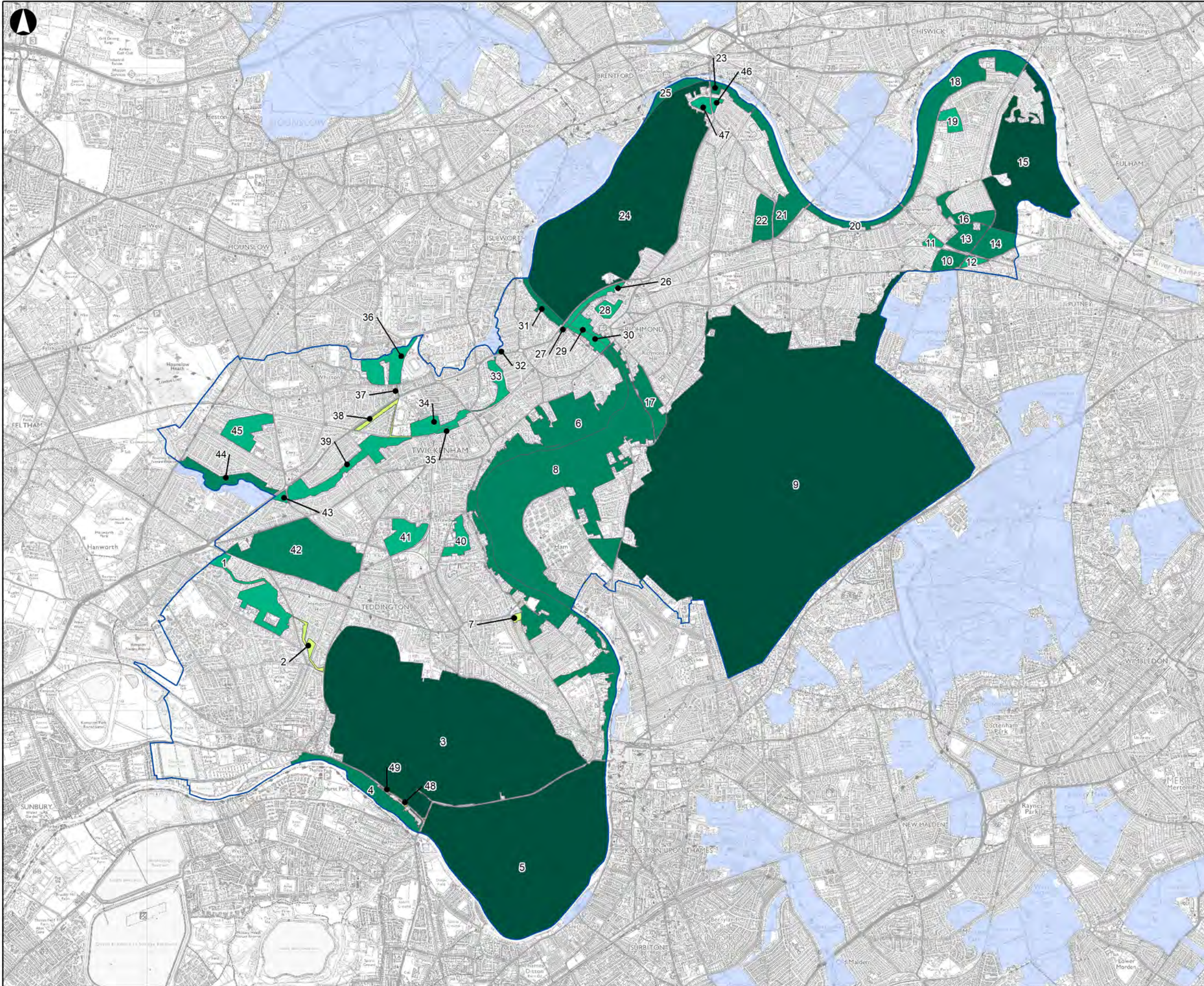
Criterion 2 assessed whether the General Areas included open-air facilities that serve either at a neighbourhood level, multiple boroughs or the whole of London. The findings of the Criterion 2 assessment are presented in Map 4.2. Most of the General Areas provide open-air facilities of neighbourhood importance, and therefore score weak-moderate (2). Fourteen General Areas provide no open-air facilities or were not accessible resulting in a non-performing green infrastructure asset, and therefore score weak (1).

Eight General Areas provide open-air facilities of at least district or borough level importance are therefore score moderate (3). Six General Areas provide open-air facilities of multiple boroughs, metropolitan or regional importance, and therefore score moderate-strong (4) or strong (5).

4.2.3 Criterion 3 Assessment

Criterion 2 assessed whether the General Areas included features or landscapes (historic, recreational or biodiversity) of local, metropolitan or national value. The findings of the Criterion 3 assessment are presented in Map 4.3. Most of the General Areas were identified as performing moderate (3), moderate-strong (4) or strong (5), due to containing historic, recreational or biodiversity features or landscapes of metropolitan, national or regional value.

Fifteen General Areas were identified as performing weak-moderate (2), due to containing historic, recreational or biodiversity features or landscapes of local value only. Two General Areas were identified as performing weak (1), due to containing no historic, recreational or biodiversity features or landscapes.



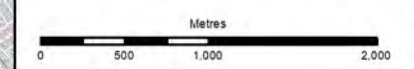
Legend

- LBRuT Borough Boundary
- Neighbouring MOL
- Criterion 1 Performance**
- Weak (1)
- Weak-Moderate (2)
- Moderate (3)
- Moderate-Strong (4)
- Strong (5)

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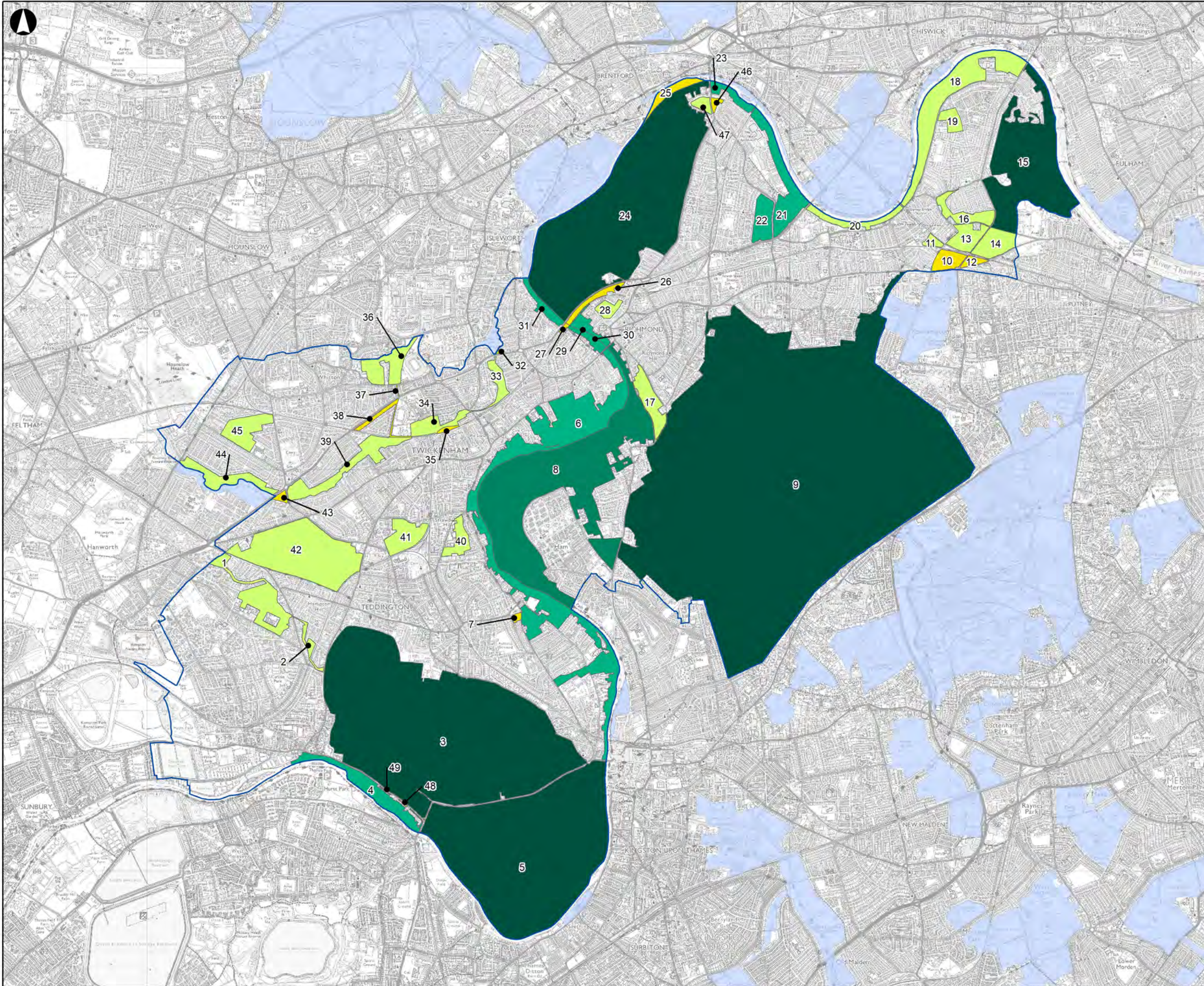
Job Title
MOL Review

MOL - Criteria 1 Scores

Scale at A3
1:45,000

Job No 280272-00	Drawing Status Issue
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Drawing No 4.1	Issue P1
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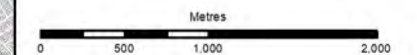
Legend

- LBRuT Borough Boundary
- Neighbouring MOL
- Criterion 2 Performance**
- Weak (1)
- Weak-Moderate (2)
- Moderate (3)
- Moderate-Strong (4)
- Strong (5)

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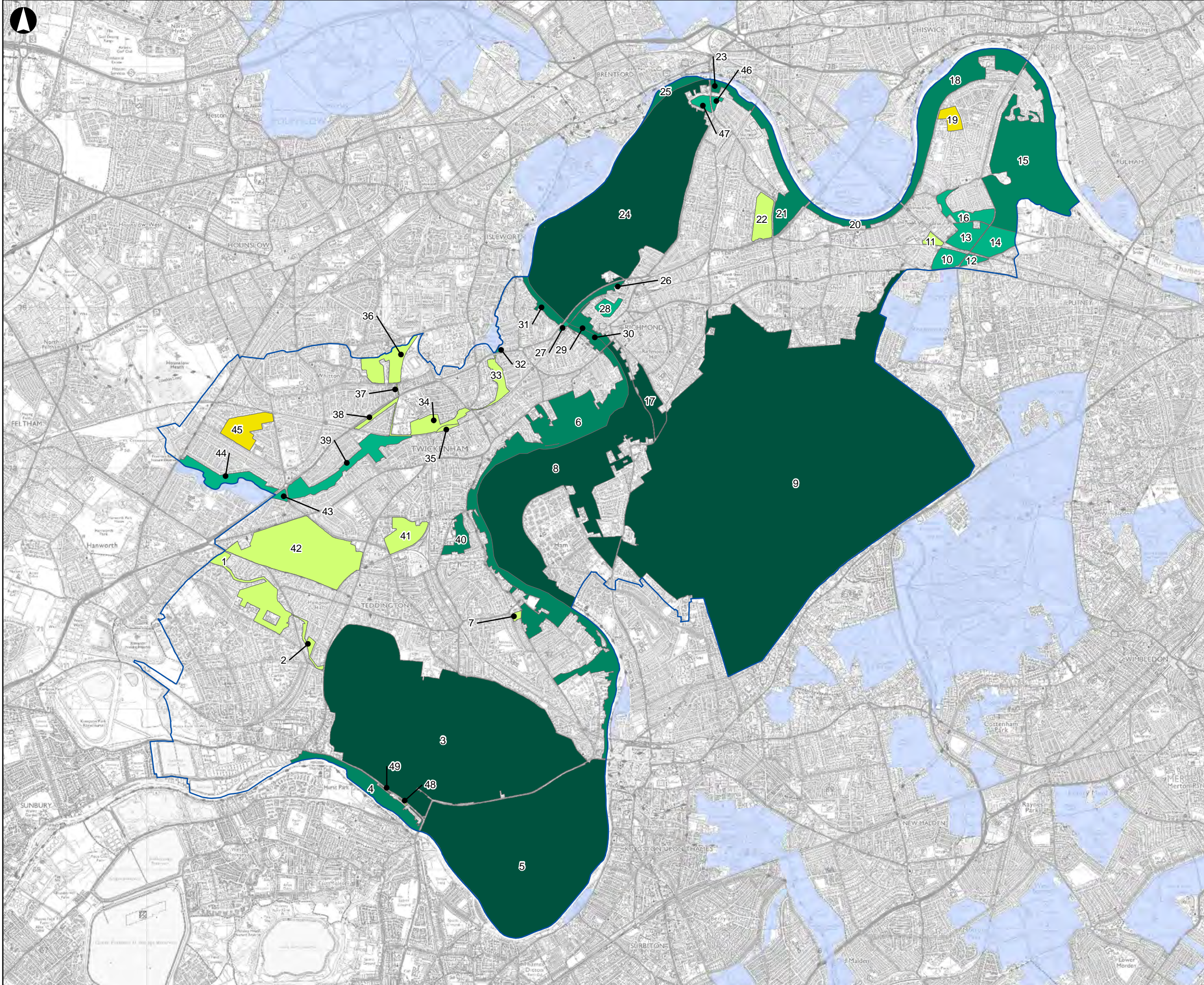
Job Title
MOL Review

MOL - Criteria 2 Scores

Scale at A3
1:45,000

Job No 280272-00	Drawing Status Issue
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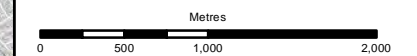


Legend

- LBRuT Borough Boundary
- Neighbouring MOL
- Criterion 3 Performance**
- Weak (1)
- Weak-Moderate (2)
- Moderate (3)
- Moderate-Strong (4)
- Strong (5)

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MOL - Criteria 3 Scores

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Job No 280272-00	Drawing Status Issue
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Drawing No 4.3	Issue P1
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4.2.4 Criterion 4 Assessment

Criterion 4 assessed the extent to which the General Area forms part of a strategic corridor node or link in the green infrastructure network. General Areas were only assessed where they meet criteria 1, 2 or 3. The findings of the Criterion 4 assessment are presented in Map 4.4. Most of the General Areas were identified as performing moderate (3), moderate-strong (4) or strong (5), due to forming part of the River Thames green and blue corridor, or other strategic connected corridor, or being a large standalone green space with a good path network.

Ten General Areas were identified as performing weak-moderate (2), due to having a fragmented access network, or no access network but likely to provide a small contribution to a strategic wildlife corridor resulting in an averaged score.

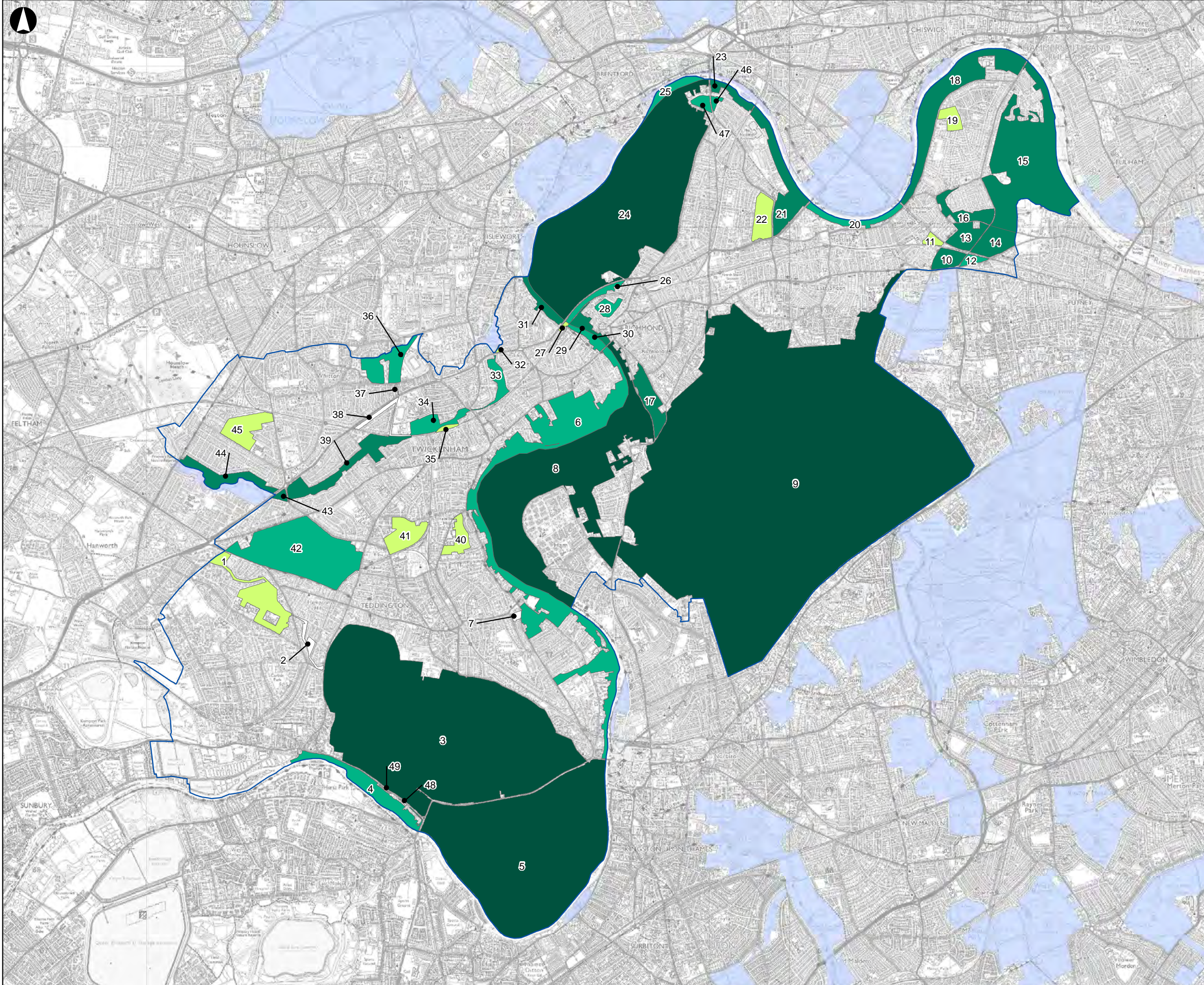
Six parcels were not assessed against criterion 4 as they did not score at least moderate (3) to meet either Criteria 1, 2 or 3.

4.2.5 Overall Performance

The overall performance against the London Plan MOL criterion was determined for each General Area, with results presented in Map 4.5. Most General Areas scored moderate-strongly (4) or strongly (5) against one or more of the MOL Criteria and were therefore all judged to meet the MOL Criteria moderate-strong (4) or strong (5) overall.

Fifteen General Areas scored moderate (3) against one or more of the MOL Criteria, scoring weak (1), weak-moderate (2) for the remaining criteria, and were therefore all judged to meet the MOL Criteria moderately (3) overall.

Six General Areas scored weak-moderate (2) against one or more of the MOL Criteria, scoring weak (1) for the remaining criteria, and were therefore all judged to meet the MOL Criteria weak-moderately (2) overall.



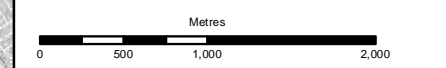
Legend

- LBRuT Borough Boundary
- Neighbouring MOL
- Criterion 4 Performance**
- No score
- Weak (1)
- Weak-Moderate (2)
- Moderate (3)
- Moderate-Strong (4)
- Strong (5)

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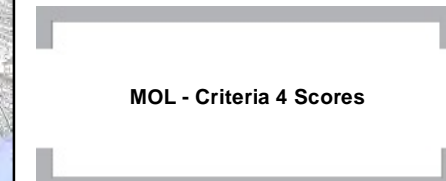


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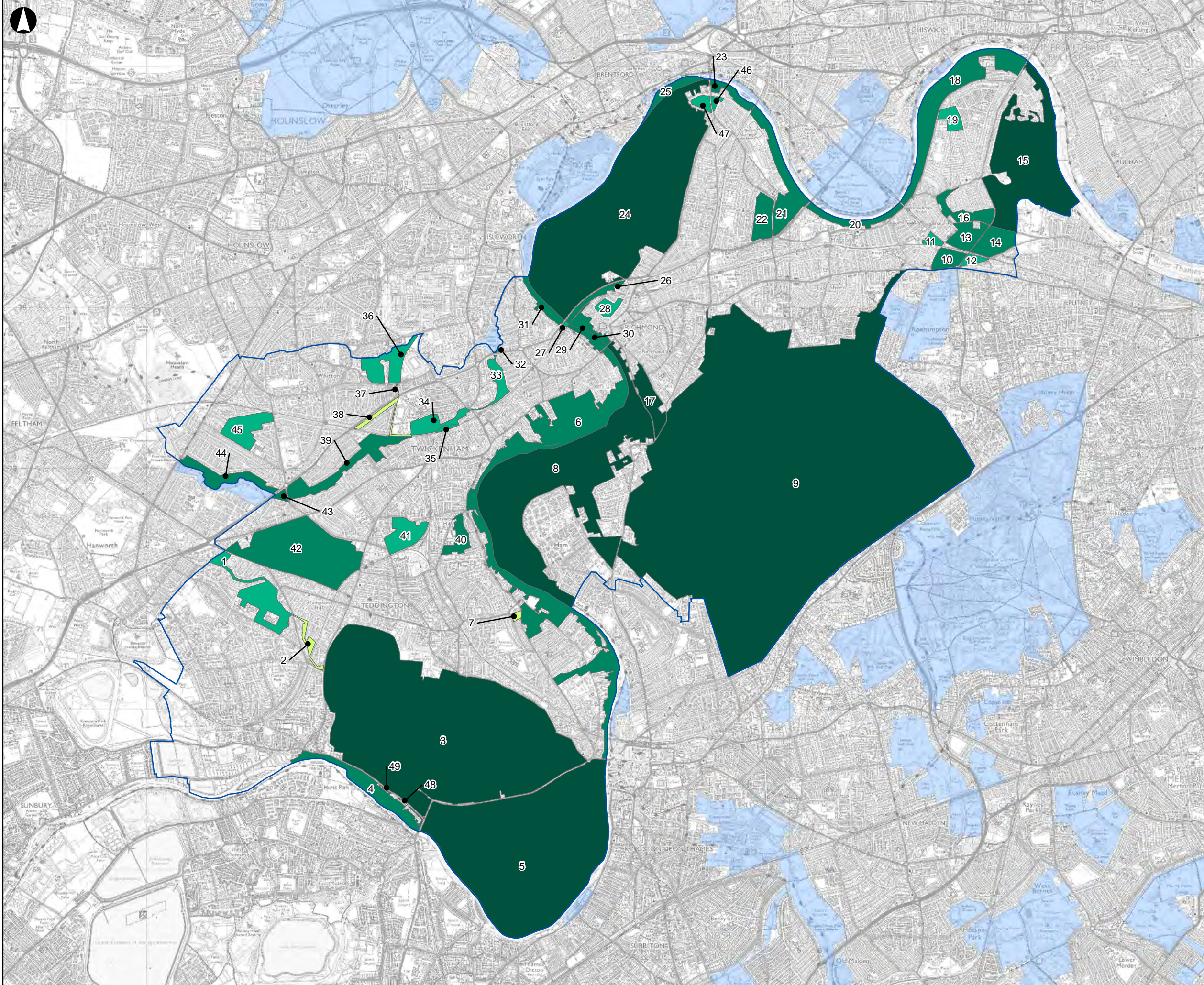
Job Title
MOL Review



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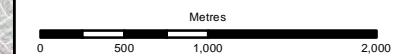
Legend

- LBRuT Borough Boundary
 - Neighbouring MOL
- Overall Performance**
- Weak (1)
 - Weak-Moderate (2)
 - Moderate (3)
 - Moderate-Strong (4)
 - Strong (5)

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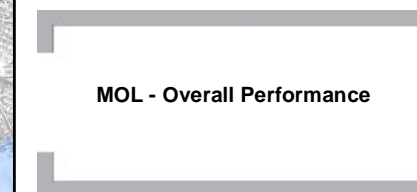


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Job Title
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4.3 Recommendations

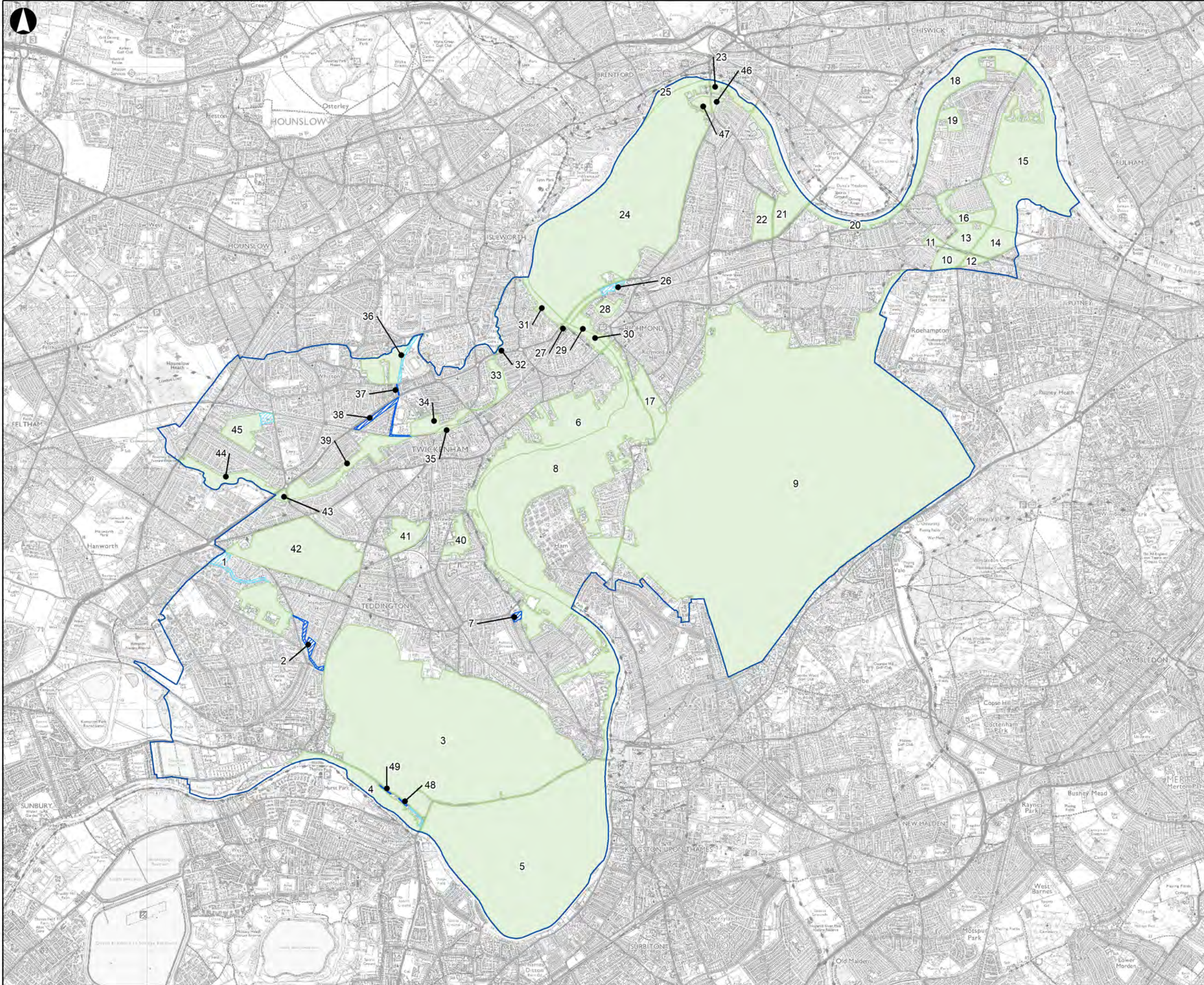
Recommendations for further consideration or review of MOL parcels were determined for each General Area, with results presented in Map 4.6. Most General Areas scored moderate (3), moderate-strongly (4) or strongly (5) overall and therefore it is recommended that these should be retained as MOL.

Six weak-moderately (2) performing General Areas have been identified:





- Two of these General Areas are private front gardens and perform weakly (1) against all MOL criteria apart from criteria 3, against which they score weak-moderate (2) due to a local Conservation Area.
- Three of these General Areas are urbanised river corridors with no/ very small associated green space and, while they have locally important biodiversity value, these features are unlikely to be developed.
- One General Area is a small pocket park, Udney Hall Gardens, which while it has locally important biodiversity and recreational value, these features are protected by other designations. The park has been proposed by the public as a potential LGS and is considered further in Section 5.

In addition, five General Areas have a section or multiple sections already or currently being developed.

It is recommended that these 11 areas should be considered further by the Council as to their role within the new Local Plan (i.e. designation and boundaries) taking into account the wider evidence base and the balance of planning factors.

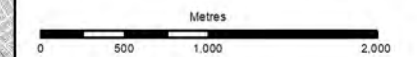


Legend

-  LBRuT Borough Boundary
- Status Recommendations**
-  Area for further review
-  Area for further consideration
-  Retain

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Job No 280272-00	Drawing Status Issue
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Drawing No 4.6	Issue P1
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5 LGS

5.1 Methodology

The approach to the LGS assessment is summarised below. Full details of the assessment processes can be found in Appendix C2.

A stepped approach was undertaken for this study as follows.

- Step 1 identified sites that were proposed for LGS designation by respondents in the informal consultation for the Direction of Travel document. Sites were sieved to ensure they met NPPF (paragraphs 101-103) and Local Plan policy LP13 requirements, i.e., in close proximity to the community it serves, local in character, not an extensive tract of land and no extant planning permission or allocation on the site that, if implemented, would make the sites incompatible for designation. The sites were also checked for other relevant designations.
- Step 2, site visits - all potential sites were visited to understand their context, character and boundary features.
- Step 3, the performance of the proposed LGS sites were assessed against the NPPF requirement that a LGS should be demonstrably special to a local community and hold particular local significance.

The proposed LGS sites were assessed against a set of criteria aligned with the five 'values' outlined in the NPPF to help identify the special nature or local significance of open space, namely:

- Beauty
- Historical significance
- Recreational value
- Tranquillity
- Richness in wildlife.

5.2 Key Findings

This section summarises the key findings from the LGS assessment against the NPPF values (1 – 5). The detailed proformas for each potential LGS site can be found in the Annex Report.

5.2.1 Site Identification

All of the proposed sites were considered to be in close proximity to the community, local in character and small scale in size. The results of the initial sieve (for site allocations and extant planning permissions) is summarised in Table 5.1.

This initial sieve led to the removal of one site, LGS2 Stag Brewery given that the land is allocated within the current Local Plan and there is a current planning application. The remaining twelve proposed sites were taken forward for assessment.

Table 5.1: Initial Sieve

Potential LGS site	Relevant site allocation	Relevant extant planning permission
1 Ellerman Avenue	None	None
2 Stag Brewery Playing Fields	<p>Site Allocation SA24 Stag Brewery, Lower Richmond Road, Mortlake</p> <p>This allocation supports the comprehensive redevelopment of the site for a mix of uses. The policy text states the playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or re-provided and upgraded. In the event of re-provision and upgrading, where a comprehensive approach to redevelopment can be taken in line with policy LP 14, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness.</p> <p>On this basis it is not considered that a redeveloped site would be compatible with an LGS designation (since its boundary may be subject to change)¹⁶.</p>	<p>This site is subject to two live planning applications for redevelopment - 18/0547/FUL and 18/0548/FUL.</p> <p>The applications are currently under consideration by the Greater London Authority and the Secretary of State has also issued a holding direction on the application.</p>
3 North Sheen Recreation Ground	None	None
4 Raleigh Road Recreation Ground	None	None
5 Ham Village Green	<p>Site Allocation SA15 Ham Close, Ham.</p> <p>This allocation supports the regeneration of Ham Close including demolition of the existing buildings and new build re-provision of all residential and non-residential buildings, plus the provision of additional new residential. The policy text states that there is a need to retain, and where possible enhance, the landscape and existing green spaces, including the Green, which is designated Public Open Space and Other Open Land of Townscape Importance, as well as trees wherever possible.</p> <p>On this basis, it is not considered that a redeveloped site would be incompatible with a LGS designation.</p>	None

¹⁶ This conclusion accords with that made by the Council in their written statement to the Local Plan Independent Examination in Public (2017), which states that the *proposed LGS designation is not consistent with the National Planning Practice Guidance as it is used in a way that undermines the aims of this Plan, particularly in relation to achieving site allocation policy SA 24 Stag Brewery* and then by the Inspector in their Report on the Examination of the Richmond Upon Thames Local Plan (in 2018) which states that *there is insufficient robust evidence that suggests any part of the Stag brewery site should be designated as LGS at this moment in time.*

Potential LGS site	Relevant site allocation	Relevant extant planning permission
6 Ham Library Garden	None	None
7 Cambridge Gardens	None	None
8 Warren Gardens	None	None
9 Udney Hall Gardens	None	None
10 Heathfield Recreation Ground	None	None
11 Crane Park	None	None
12 Westerley Ware Recreation Ground	None	None
13 Pensford Field Kew	None	None

5.2.2 Criterion 1 Assessment - Beauty

Criterion 1 – Beauty assessed the level of visual attractiveness, extent of natural features and contribution to the local area and sense of place.

The findings of the criterion 1 assessment are presented in Map 5.1. For this criterion, nine sites scored strongly or very strongly, two sites scored moderately and one site scoring weakly.

5.2.3 Criterion 2 Assessment – Historical Significance

Criterion 2 – Historical Significance considered whether the site was historically designated or had any notable or recorded historical value.

The findings of the criterion 2 assessment are presented in Map 5.2. For this criterion, seven sites scored very strongly, and the remaining five sites scored weakly.

5.2.4 Criterion 3 Assessment – Recreational Value

Criterion 3 – Recreational Value assessed the accessibility of the site, range of formal and informal uses and facilities.

The findings of the criterion 3 assessment are presented in Map 5.3. For this criterion, four sites scored strongly or very strongly, six sites scored moderately and the remaining two sites scored weakly.

5.2.5 Criterion 4 Assessment - Tranquillity

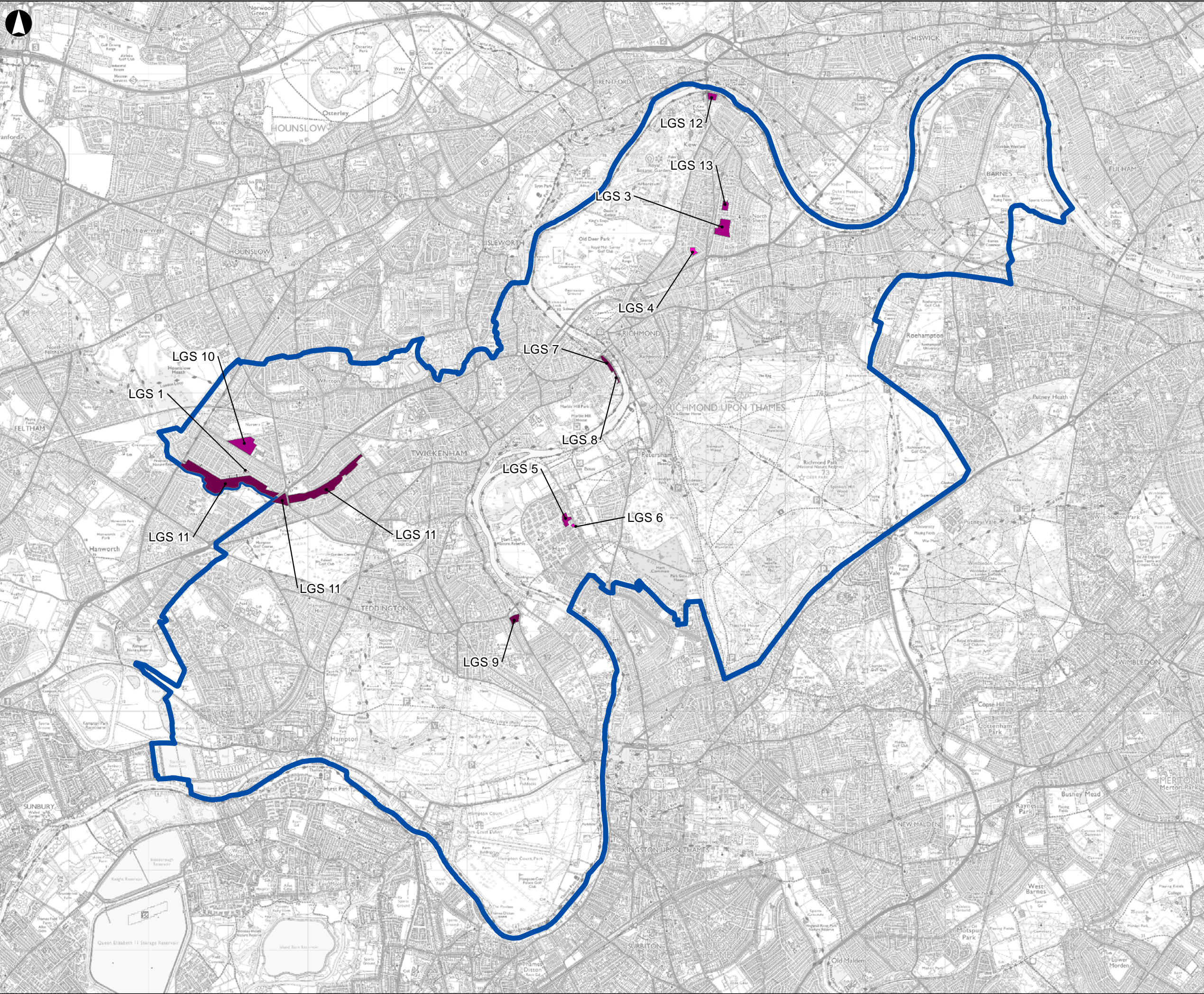
Criterion 4 – Tranquillity assessed the level of disturbance, intrusion, screening and self-containment.

The findings of the criterion 4 assessment are presented in Map 5.4. For this criterion, four sites scored strongly or very strongly, six sites scored moderately and two sites scored weakly.

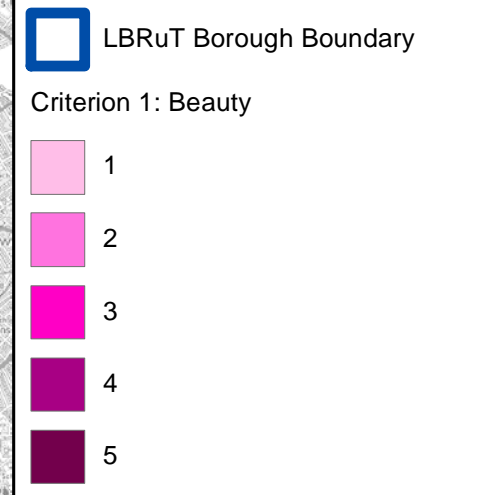
5.2.6 Criterion 5 Assessment – Richness in wildlife

Criterion 5 – Richness in wildlife considered the level of habitats present and whether any such habitats are located in a local, regional or internationally designated wildlife value area.

The findings of the criterion 5 assessment are presented in Map 5.5. For this criterion, one site scored very strongly, eight sites scored weakly and the remaining three sites scored very weakly.



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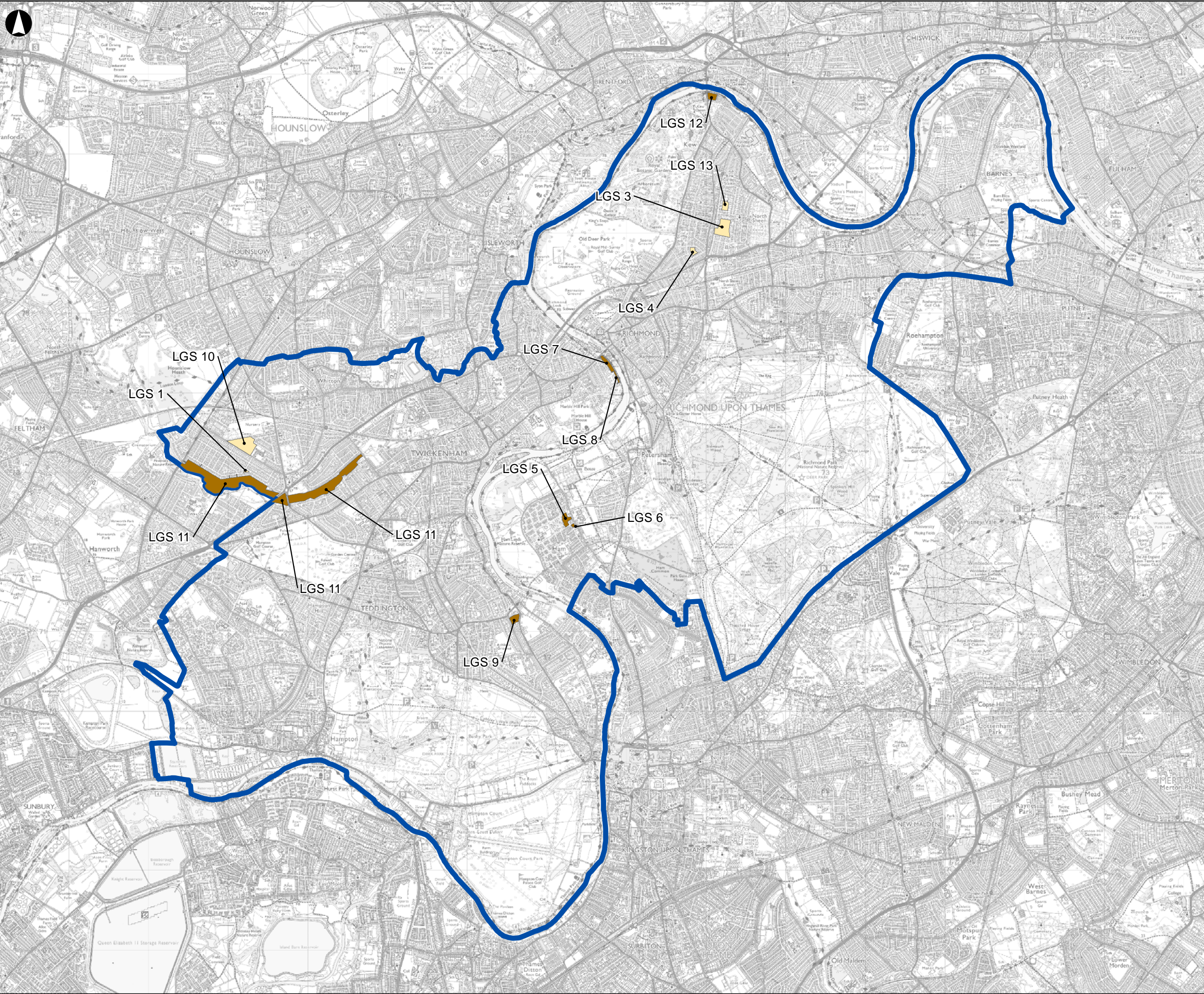
Client
London Borough of Richmond upon Thames

Job Title
LGS Review

LGS - Criterion 1 Scores

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Drawing No 5.1	Issue P1



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Criterion 2: Historic Significance

0

3

5

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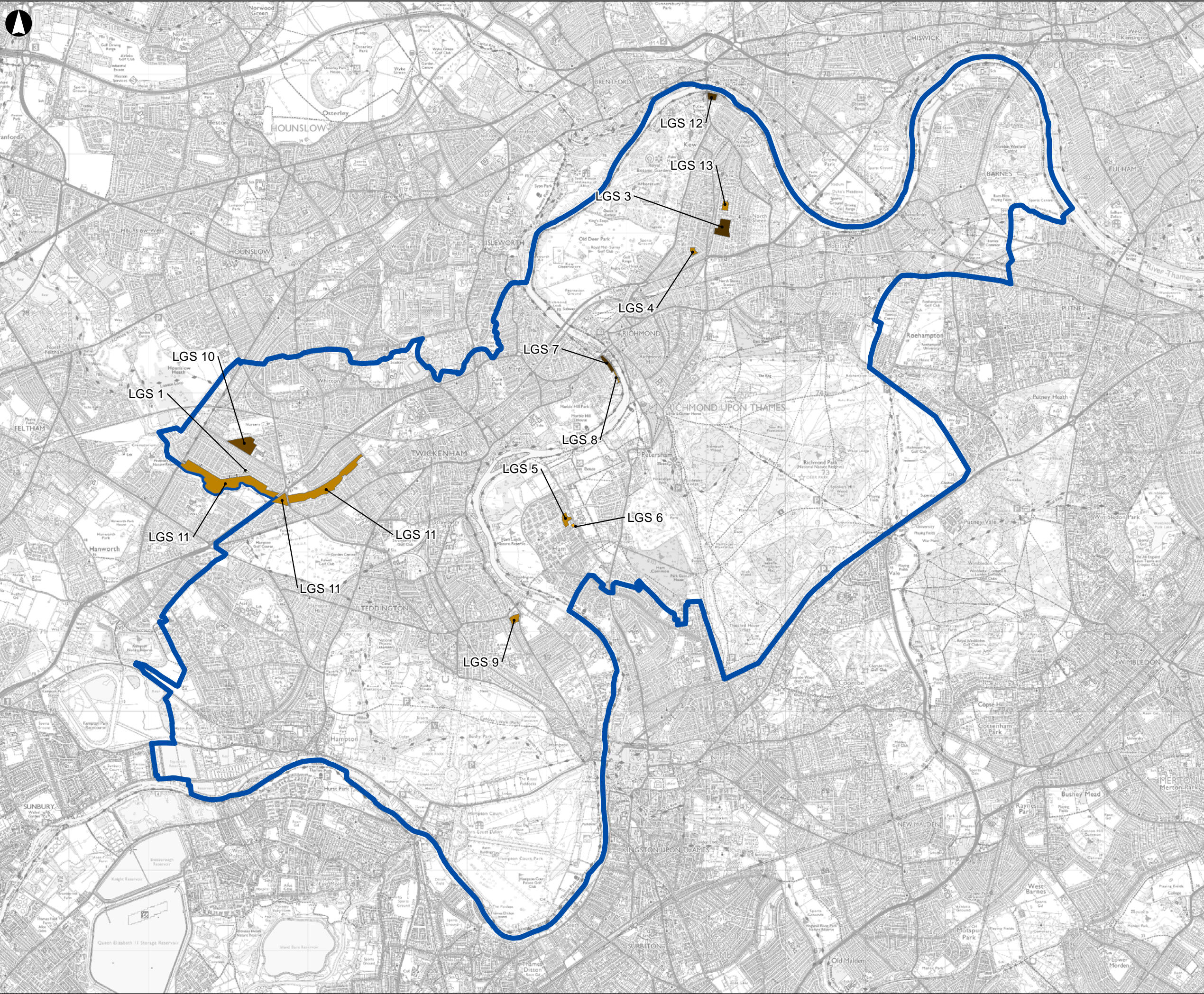
Client
London Borough of Richmond upon Thames

Job Title
LGS Review

LGS - Criterion 2 Scores

Scale at A3
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Job No 280272-00	Drawing Status Issue
Drawing No 5.2	Issue P1



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Criterion 3 Recreational Value

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

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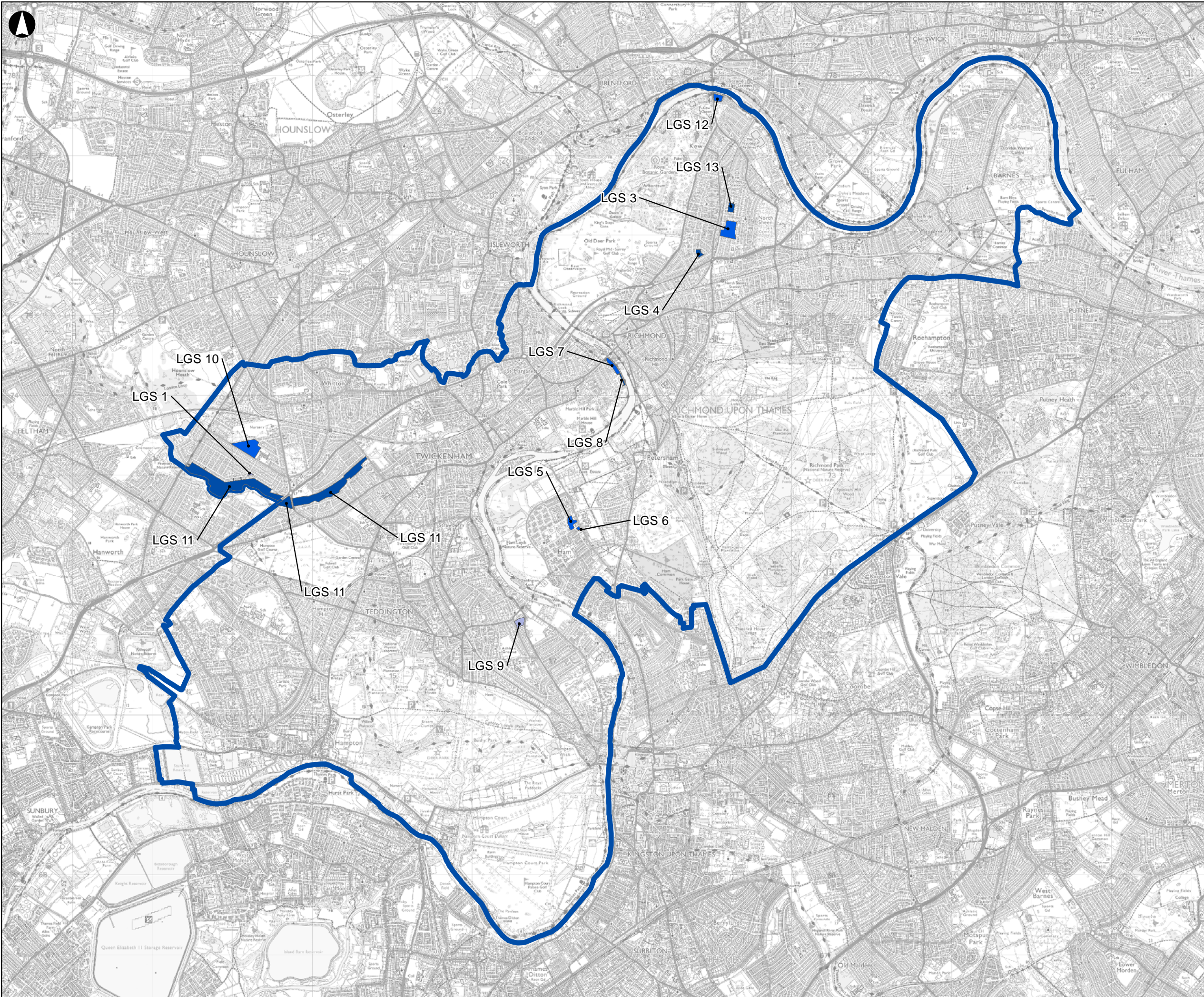
Client
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Job Title
LGS Review

LGS - Criterion 3 Scores

Scale at A3
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Criterion 4: Tranquillity

- 1
- 2
- 3
- 4
- 5

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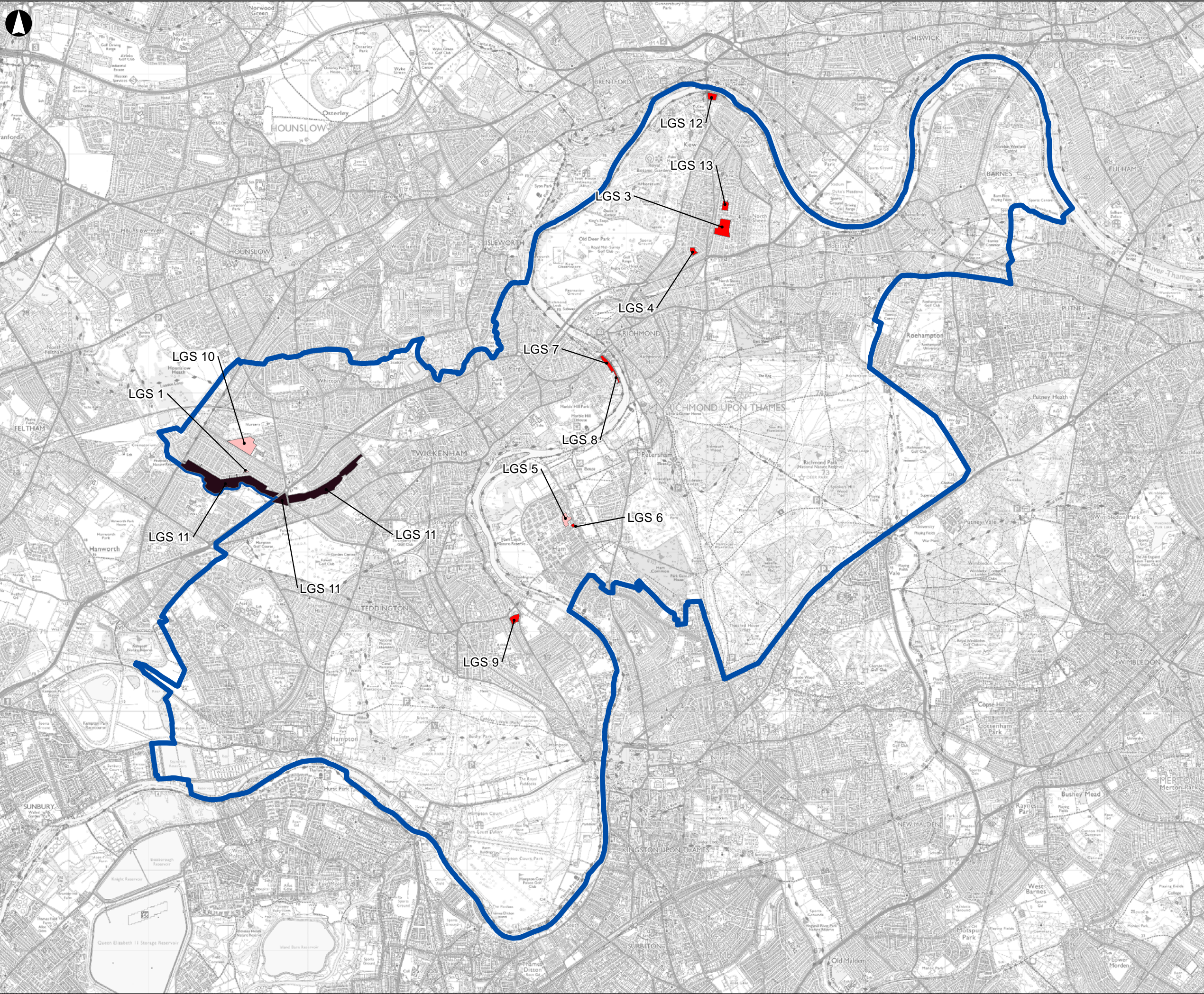
Client
London Borough of Richmond upon Thames

Job Title
LGS Review

LGS - Criterion 4 Scores

Scale at A3
1:45,000

Job No 280272-00	Drawing Status Issue
Drawing No 5.4	Issue P1



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Criterion 5: Richness of wildlife

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

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LGS - Criterion 5 Scores

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5.2.7 Overall Performance

Any LGS scoring strongly or very strongly (4 or 5) against the criteria for one or more NPPF 'values' was judged to perform strongly. Eleven sites were found to perform strongly.

Any LGS scoring moderately (3) against at least one NPPF value and failing to score strongly or very strongly (4 or 5) against any value was judged as meeting the assessment criteria moderately. No sites fell within this category.

Any LGS scoring weakly or very weakly (1 or 2) across all NPPF 'values' was judged to meet the purpose assessment criteria weakly. Only one site, LGS 1 – Triangle of grass at Ellerman Avenue, scored weakly overall.

In summary, of the 12 potential local green space sites assessed, one scored weakly and the remaining 11 potential sites scored strongly overall against the criteria. Overall performance of the proposed LGS sites is illustrated in Map 5.6.

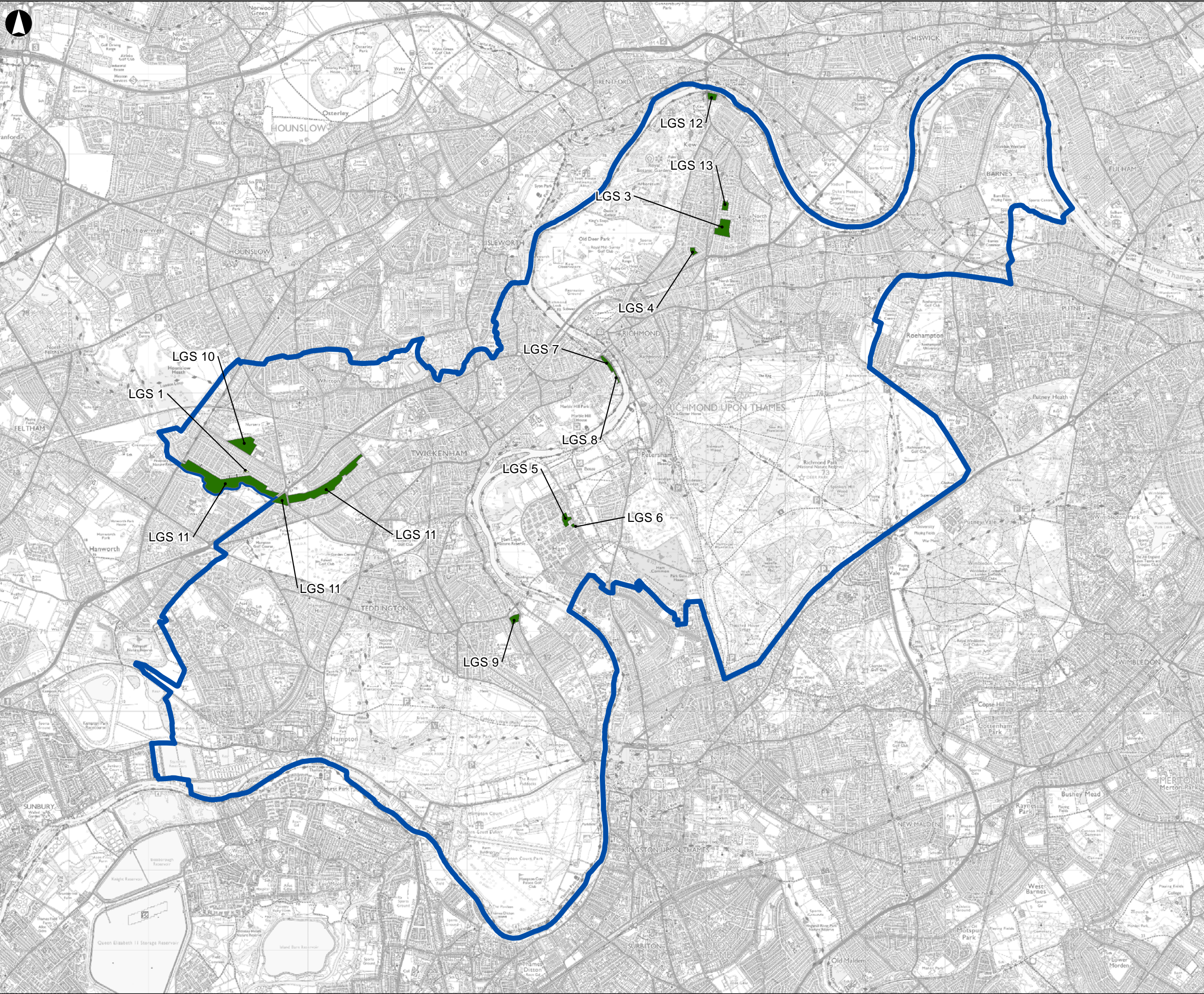
5.3 Recommendations

Based on the methodology stronger and moderately performing sites were considered further for designation as LGS based on the following NPPF policy requirements / guidance:

- If land is already protected by Green Belt or MOL policy, then consideration should be given to whether any 'additional local benefit' would be gained by designation as Local Green Space.
- Different types of designations are intended to achieve different purposes. If the land is already protected by other designations (such as SSSI, Scheduled Monument or Conservation Areas), then consideration should be again be given to whether any 'additional local benefit' would be gained by designation as Local Green Space.

Table 5.2 summarises the existing designations that apply to the proposed sites, overall performance and recommendation. Six sites (LGS sites 3, 4, 5, 6, 8, and 13) are recommended for further consideration for designation as LGS, as shown on Map 5.7. While two sites (LGS sites 1 and 13) were considered further as OOLTI (see section 5.4).

It will be for the Council to ultimately make any final decisions regarding the future of LGS within the borough taking into account all of the Local Plan evidence base and the spatial vision and objectives for the LBRuT.



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Overall Performance

Weakly

Moderately

Strongly

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LGS - Overall Performance

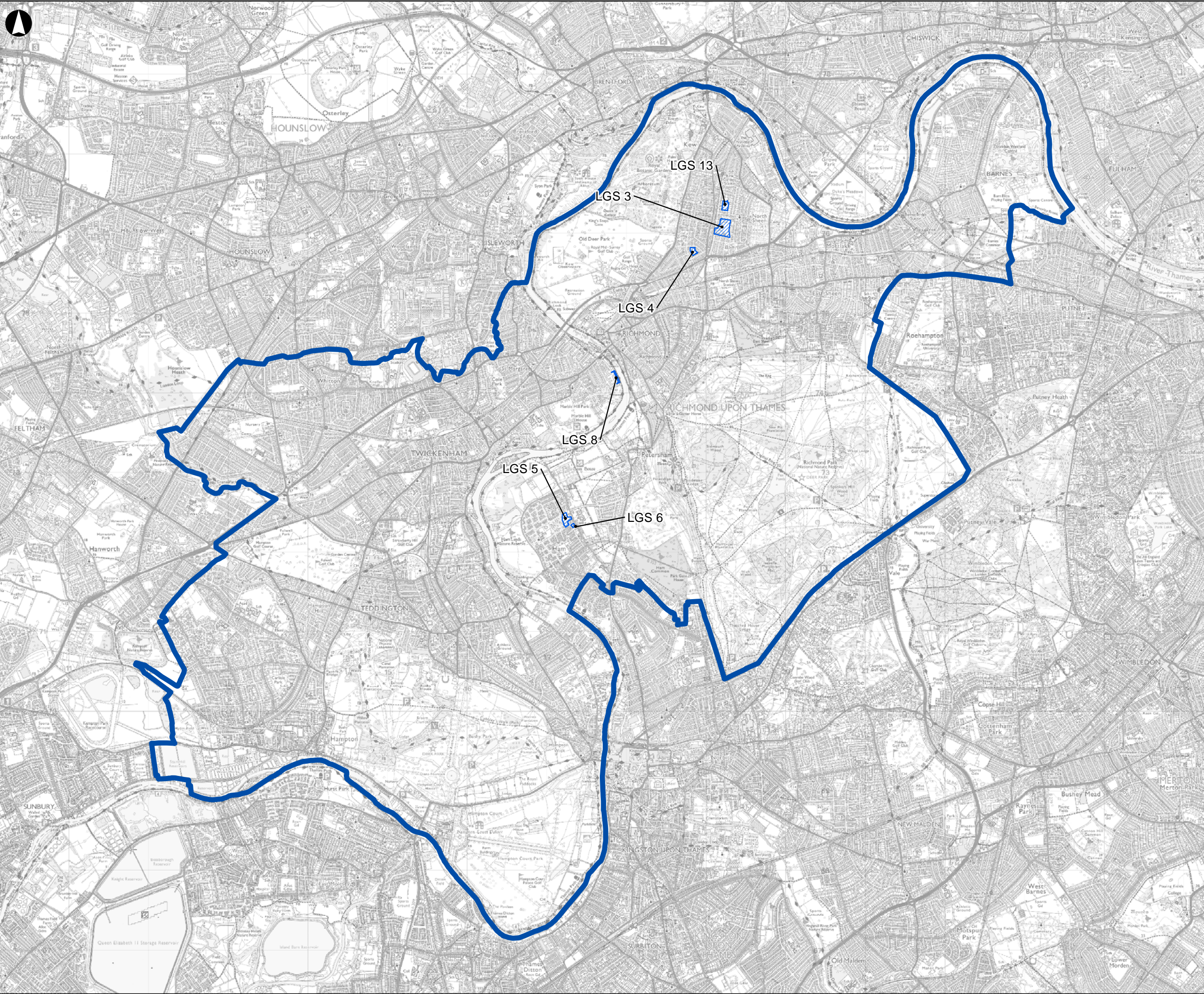
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Drawing No 5.6	Issue P1



Table 5.2 Designations, Conclusions and Recommendations

Potential LGS site	Other designations	Overall Performance	Recommendation
1 Ellerman Avenue	n/a	The site scored weakly overall	Not recommended Not recommended for further consideration as LGS due to weak performance. Consider further as OOLTI.
2 Stag Brewery Playing Fields	Mortlake Brewery Ground OOLTI	n/a	Not recommended The site is subject to a site allocation for redevelopment (as well as two live planning applications). It is judged that the site is incompatible with a LGS designation and therefore not recommended for further consideration as LGS.
3 North Sheen Recreation Ground	North Sheen Rec Ground OOLTI, OSNI, Public Open Space	The site scored strongly overall.	Consider further as LGS. The site is already designated as OSNI and Public Open Space; it will therefore be for the Council to consider whether a LGS designation would result in any additional local benefit.
4 Raleigh Road Recreation Ground	Raleigh Gardens OOLTI, Public Open Space	The site scored strongly overall.	Consider further as LGS. The site is already designated as OOLTI and Public Open Space; it will therefore be for the Council to consider whether a LGS designation would result in any additional local benefit.
5 Ham Village Green	Open Space Back Lane OOLTI, Public Open Space	The site scored strongly overall.	Consider further as LGS. The site has an existing allocation; however, this is not considered to be incompatible with a LGS designation. The site is already designated as OOLTI and Public Open Space; it will therefore be for the Council to consider whether a LGS designation would result in any additional local benefit.
6 Ham Library Garden	Ham House Conservation Area	The site scored strongly overall.	Consider further as LGS. The site is already designated as Conservation Area; it will therefore be for the Council to consider whether a LGS designation would result in any additional local benefit.
7 Cambridge Gardens	Cambridge Park Gardens MOL, Public Open Space, Richmond Hill Conservation Area	The site scored strongly overall.	Not recommended The site is already designated as MOL, it is not considered that there would be any additional local benefit gained by adding a further designation to the site as LGS. As such, despite scoring strongly overall the site is not recommended for further consideration as LGS.

Potential LGS site	Other designations	Overall Performance	Recommendation
8 Warren Gardens	Public Open Space, Richmond Hill Conservation Area	The site scored strongly overall.	Consider further as LGS The site is already designated as Conservation Area and Public Open Space; it will therefore be for the Council to consider whether a LGS designation would result in any additional local benefit.
9 Udney Hall Gardens	Udney Park MOL, Public Open Space, Teddington Lock Conservation Area	The site scored strongly overall	Not recommended The site is already designated as MOL, it is not considered that there would be any additional local benefit gained by adding a further designation to the site as LGS. As such, despite scoring strongly overall the site is not recommended for further consideration as LGS.
10 Heathfield Recreation Ground	Powder Mill MOL, Public Open Space	The site scored strongly overall.	Not recommended The site is already designated as MOL, it is not considered that there would be any additional local benefit gained by adding a further designation to the site as LGS. As such, despite scoring strongly overall the site is not recommended for further consideration as LGS.
11 Crane Park	Crane Park Triangle MOL, Crane Park Triangle OSNI, Crane Corridor SINC and Crane Park Island Nature Reserve, Public Open Space	The site scored strongly overall.	Not recommended The site is already designated as MOL, it is not considered that there would be any additional local benefit gained by adding a further designation to the site as LGS. As such, despite scoring strongly overall the site is not recommended for further consideration as LGS.
12 Westerley Ware Recreation Ground	Westerly Ware MOL, Public Open Space, Kew Green Conservation Area	The site scored strongly overall.	Not recommended The site is already designated as MOL, it is not considered that there would be any additional local benefit gained by adding a further designation to the site as LGS. As such, despite scoring strongly overall the site is not recommended for further consideration as LGS.
13 Pensford Field Kew	Pensford Field OSNI and Pensford Field SINC	The site scored strongly overall.	Consider further as LGS The site is already designated as OSNI and SINC; it will therefore be for the Council to consider whether a LGS designation (which is to demonstrate its particular local significance) would result in any additional local benefit. At the Council's request, this council owned site was also assessed as OOLTI (see section 5.4)



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-  LBRuT Borough Boundary
- Recommendations**
-  Consider further as LGS

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Job Title
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LGS - Recommendations

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Drawing No 5.7	Issue P1

5.4 Further OOLTI assessment

As set out in the LGS recommendations section (5.3) two potential sites (LGS 1) and (LGS 13) were carried over for assessment against the OOLTI criteria. The sites were assigned OOLTI site references 169 and 170 respectively.

The overall performance against the policy criteria was determined for each potential site (refer to site proforma), with results presented in Map 5.8. Both sites scored high against one or more of the criteria and were therefore judged to meet the OOLTI criteria strongly.

It is recommended that these sites are further considered for designation as OOLTI. It is acknowledged that LGS 13/ OOLTI Site 170 has been recommended for further consideration for both LGS and OOLTI designations. It will therefore be for the Council to make a balanced judgement around which designation is most appropriate (or neither given the existing designations) as part of their wider work on the Local Plan.

Site number: 169

Site name: Trinagle of grass at Ellerman Avenue

Place: Whitton and Heathfield Village

Type of open space: Incidental green space

Designations (highlighted below)

World Heritage Site	Archaeological priority area	Conservation area	Listed buildings	Registered park and garden	Scheduled monuments	EA Flood Zone	Ancient woodland
Green belt	MOL	Local Green Space	Ramsar site	Special Protection Area	Special Area of Conservation	National Nature Reserve	SSSI
Local Nature Reserve	SINC (Metropolitan)	SINC (Borough Grade 1)	SINC (Borough Grade 2)	SINC (Local)	OSNI		

Initial assessment: Is the site predominantly open? If 'yes' continue with assessment. If 'no' provide commentary and skip to Recommendations

Yes: Site is predominantly Grassed area at road junction undeveloped

Criterion 1: Contribution to the local character and/or street scene, by virtue of its size, position and quality

1 a): size

0.20 ha

Classification: **Medium**

1 b): position

Medium Forms a noticeable contribution to the street scene.

1 c): quality

Medium Appears to be generally well maintained and has a couple of mature trees. However, it lacks characteristic elements.

Criterion 2: Value to local people for its presence and openness

High Accessible and predominantly open.

Criterion 3: Immediate or longer views into and out of the site, including from surrounding properties

Medium Visible from a few surrounding properties.

Criterion 4: Contribution to a network of green spaces and green infrastructure

Distance from nearest green infrastructure: Under 50m

Distance from nearest mapped green space: Under 50m

High Close to River Crane and Crane Park

Criterion 5 Value for biodiversity and nature conservation and meets one of the above criteria

Value for biodiversity and nature conservation: **Low**

Recommendations

Overall performance: **Strong**

Site scores 'High' against Criteria 2 and 4 and therefore meets criteria strongly.

Site number: 170

Site name: Pensford Field, Kew

Place: Kew Village

Type of open space: Private back gardens

Designations (highlighted below)

World Heritage Site	Archaeological priority area	Conservation area	Listed buildings	Registered park and garden	Scheduled monuments	EA Flood Zone	Ancient woodland
Green belt	MOL	Local Green Space	Ramsar site	Special Protection Area	Special Area of Conservation	National Nature Reserve	SSSI
Local Nature Reserve	SINC (Metropolitan)	SINC (Borough Grade 1)	SINC (Borough Grade 2)	SINC (Local)	OSNI		

Initial assessment: Is the site predominantly open? If 'yes' continue with assessment. If 'no' provide commentary and skip to Recommendations

Yes: Site is predominantly undeveloped
Includes nature reserve and private tennis courts.

Criterion 1: Contribution to the local character and/or street scene, by virtue of its size, position and quality

1 a): size

0.80 ha Classification: **High**

1 b): position

Low Located to rear of houses on Pensford Avenue and accessible between houses (with access shared with Pensford Tennis Club)

1 c): quality

High Nature reserve is in very good physical condition and well-managed, with an excellent variety of natural features.

Criterion 2: Value to local people for its presence and openness

High Whilst access must be arranged, the nature reserve is publicly accessible and includes seating.

Criterion 3: Immediate or longer views into and out of the site, including from surrounding properties

Low Behind houses and not visible from within the streetscene.

Criterion 4: Contribution to a network of green spaces and green infrastructure

Distance from nearest green infrastructure: Under 50m

Distance from nearest mapped green space: Under 100m

High Close to North Sheen Recreation Ground

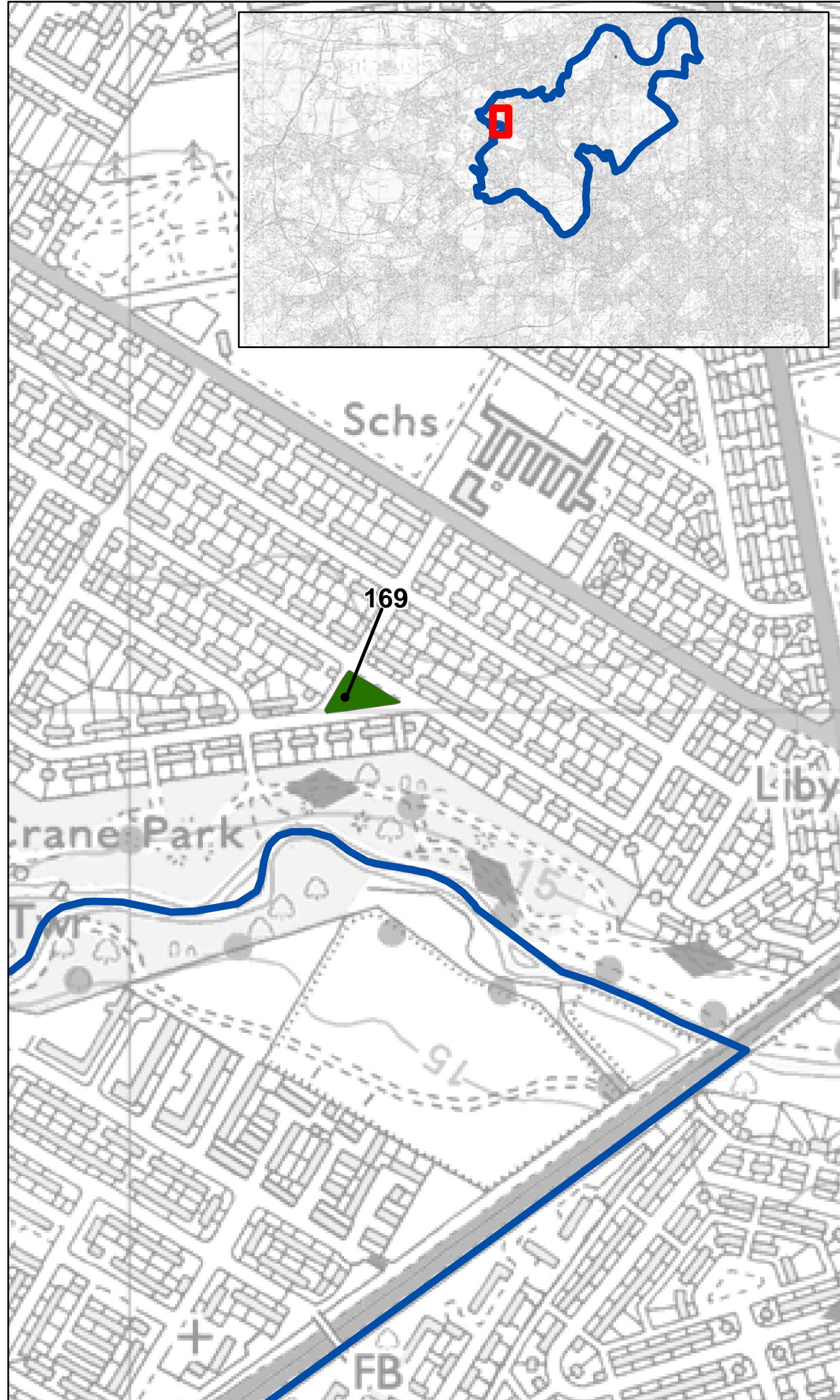
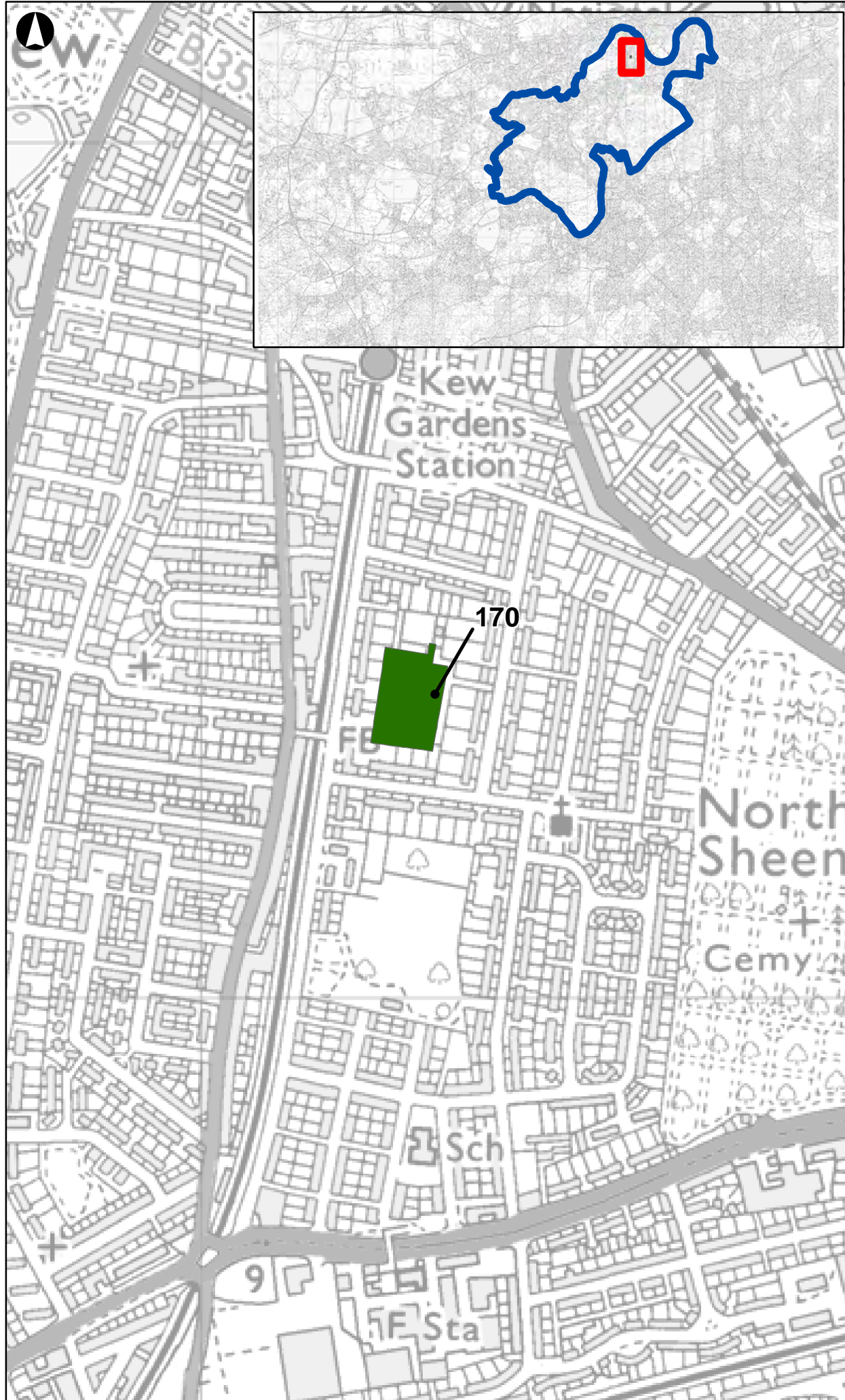
Criterion 5 Value for biodiversity and nature conservation and meets one of the above criteria

Value for biodiversity and nature conservation: **Medium**

Recommendations

Overall performance: **Strong**

Site scores 'High' against Criteria 1c, 2 and 4 and therefore meets criteria strongly.



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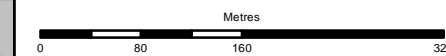
Overall Performance

- Weak
- Moderate
- Strong

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Job Title
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OOLTI Proposed Sites Overall Performance

Scale at A3
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Job No 280272-00	Drawing Status Issue
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Drawing No 5.8	Issue P1
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6 OOLTI

6.1 Methodology

The approach to the OOLTI assessment is summarised below. Full details of the assessment processes can be found in Appendix C3.

6.1.1 OOLTI Assessment

A stepped approach was undertaken for this study as follows.

- Step 1 reviewed existing data and relevant documents.
- Step 2 assessed the performance of each site against the criteria in Local Plan policy LP14.
- Step 3 - one site visit undertaken for familiarisation with local context and review of selected sites.
- Step 4 - the overall performance of the OOLTI sites was assessed against Local Plan policy LP14.

The OOLTI sites were assessed against all five of the defining criteria for OOLTI, noting that not all of these criteria need to be met:

- Contribution to the local character and/or street scene, by virtue of its size, position and quality.
- Value to local people for its presence and openness.
- Immediate or longer views into and out of the site, including from surrounding properties.
- Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 'Green Infrastructure'.
- Value for biodiversity and nature and meets one of the above criteria.

6.2 Key Findings

This section summarises the key findings from the assessment. The detailed proformas setting out the assessments for each OOLTI site (168 no.) can be found in the Annex Report.

To note, this section excludes consideration of potential OOLTI sites which have emerged from the LGS assessment and are considered in section 5.4.

6.2.1 Initial Assessment

The initial assessment reviewed whether the site was predominantly open. Most of the sites were a 'yes' to this question. However, two of the sites were a 'no'. These were sites 57 (York House Car Park), which is predominantly developed as a car park; and 59 (Harlequins Site), which includes apartment blocks. Neither of

these sites were assessed further and both were assessed as weakly performing against the criteria.

6.2.2 Criterion 1 Assessment

Criteria 1 (Contribution to the local character and/or street scene, by virtue of its size, position and quality) was split into three separate assessments. The scores for each of these is set out below.

6.2.2.1 Criterion 1a: size

Most sites were identified as scoring high or medium (69 sites and 66 sites respectively). Thirty-one sites scored low as they were under 0.1ha in size.

6.2.2.2 Criterion 1b: position

Forty-six sites scored high against this criterion, as they formed focal points, made a significant contribution to the street scene and local character or were an important feature in the local area. Fifty-five sites scored medium. These sites were usually visible in the streetscape but were not prominent or particular focal points.

Sixty-five sites scored low. Sites which scored low were generally not visible from the public realm as they were behind buildings, including sites that were private gardens.

6.2.2.3 Criterion 1c: quality

The majority of sites (97) scored medium for this criterion, with 61 sites scoring high. Such sites were generally intact, well-managed, in good condition, had a range of trees and planting and were attractive.

Eight sites scored low for this criterion. Whilst open and containing some grass or trees, these sites generally had been affected by incremental land use change such as being partially tarmacked over, part used for car parking and were generally unattractive and without significant quality planting or vegetation.

6.2.3 Criterion 2 Assessment

For criterion 2 (value to local people for its presence and openness), sites mostly scored high (76 sites) or medium (55 sites). These sites were assessed as likely to be of value to local people for their presence as green open spaces, particularly where they either contributed to the quality of the surrounding environment, or where they were accessible.

Thirty-five sites scored low for this criterion, generally because the sites were not visible or accessible to more than a few people (e.g. they were private back gardens)

6.2.4 Criterion 3 Assessment

Criterion 3 assessed the extent to which there were immediate or longer views into and out of the site, including from surrounding properties. Fifty-eight sites scored high, and 50 sites scored medium. Fifty-eight sites scored low – these were generally sites that were only visible to a very few properties surrounding it or where the site was not visible because it was behind a high boundary fence.

6.2.5 Criterion 4 Assessment

Criterion 4 assessed the contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 ‘Green Infrastructure’. GIS analysis was used to calculate the site’s proximity to small types of green infrastructure such as trees, and its proximity to larger open spaces. This analysis was used alongside assessment of the site in Google Earth to establish its contribution to a wider network of green spaces.

The majority of sites scored high for this criterion (99 sites), or medium (61 sites), reflecting the high quality of the green infrastructure networks in the borough. Six sites scored low as they were assessed as making little contribution to the network of green infrastructure.

6.2.6 Criterion 5 Assessment

Sites must have met one of the previous criteria to be assessed against criterion 5 (value for biodiversity and nature conservation). Eleven sites scored high – these sites were designated at a borough level or higher for biodiversity. Fifteen sites scored medium, and 140 sites scored low – these sites had no nature designations on any part of them.

6.2.7 Overall Performance

The overall performance against the policy criteria was determined for each site, with results presented in Map 6.1. Most sites (134 sites) scored high against one or more of the criteria and were therefore judged to meet the OOLTI criteria strongly.

Thirty-one sites scored medium against one or more of the criteria, scoring low for the remaining criteria, and were therefore judged to meet the OOLTI criteria moderately overall.

Three sites scored low against all criteria (or not meeting the initial openness assessment) and were therefore judged to meet the OOLTI criteria weakly overall.

6.3 Recommendations

Most sites were predominantly open and scored moderate or strongly overall, and therefore it is recommended that these should be retained as OOLTI.

Two sites were assessed as being not predominantly open and therefore weakly performing.

- Site 57 (York House Car Park) is predominantly a car park (Figure 6.1). Although there is some attractive planting around the outside of the car park, it is considered to be predominantly classified as ‘developed’ and therefore not ‘open’. Site 57 is part of the York House Registered Park and Garden, and therefore it should be considered as to whether its designation as an OOLTI offers any protection over and above this designation.
- Site 59 (Harlequins Site) is almost entirely occupied by apartment blocks (Figure 6.1). It is considered to be ‘developed’ and therefore not ‘open’

One further weakly performing site was identified.

- Site 91 (Heathside and Powder Mill Lane) is private gardens with limited green infrastructure connectivity and little contribution to wider character.

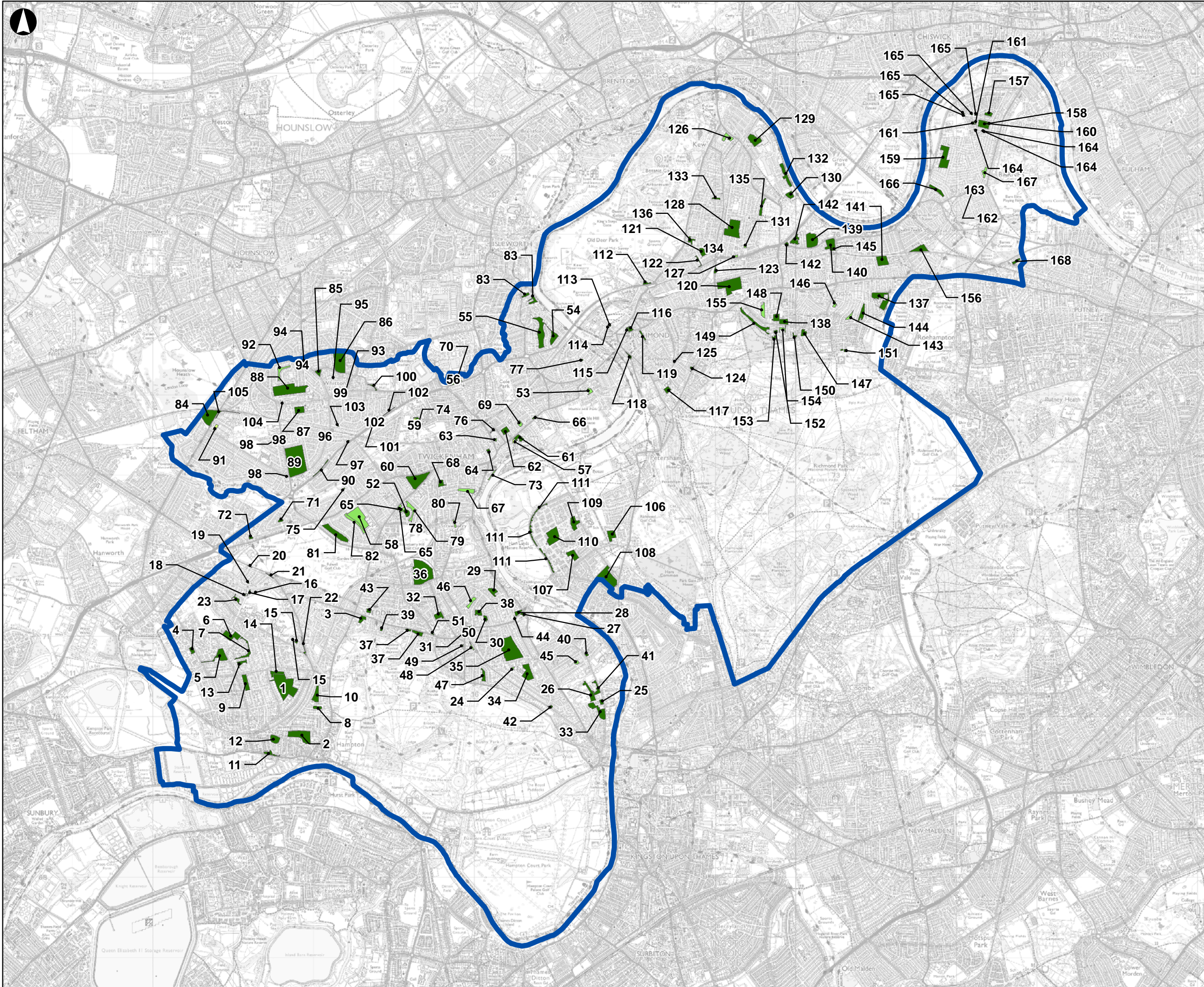
It is recommended that these sites should be considered further as to whether their OOLTI designations are retained. The Council will be able to take these recommendations into consideration alongside other evidence in making decisions about the Local Plan strategy, policy designations and site allocations.



Site 57
(York
House car
park)



Figure 6.1 OOLTI Sites Recommended for Further Consideration



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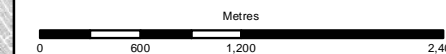
Overall Performance

- Weak
- Moderate
- Strong

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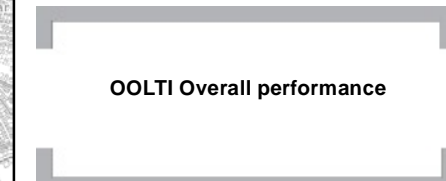


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Drawing No 6	Issue P1
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7 Conclusions

This study has examined the performance of open space within the LBRuT, specifically the Green Belt, MOL, potential LGS and OOLTI, against the relevant NPPF, London Plan and Local Plan purposes and criteria. Much of the borough is covered by these open space designations, which collectively play important roles including preventing the sprawl of Greater London and the coalescence of neighbourhoods, contributing to the character of neighbourhoods and providing green spaces for recreation, nature and associated health and wellbeing impacts. The open spaces also have an important role to play as part of the borough's green infrastructure network, which is considered more widely as part of other evidence base studies.

It is important to note that the recommendations set out in this report will not automatically lead to the release or designation of land. The areas / sites identified through this study as warranting further consideration will need to be subject to more detailed assessment and / or consideration in terms of the wider balance of planning factors. Ultimately this review will sit as part of a suite of evidence base documents that will be used to inform future plan making. Following this study, it will be for the Council to make decisions as part of updating the Local Plan, which will determine which areas / sites might be released from / added to the various designations.

7.1 Green Belt

Since its creation in the 1930s, the Richmond Green Belt has performed an important role as part of the wider Metropolitan Green Belt for London preventing urban sprawl and merging of settlements and ensuring the provision of open countryside for all.

Only a small proportion (2.29%) of the borough is covered by Green Belt and the southern portion in particular is fragmented by pockets of development within the Green Belt. Nevertheless, the southern part of Green Belt land within LBRuT makes a very strong contribution in preventing the outward sprawl of Greater London and preventing the merging of neighbouring settlements.

This study considered how well the Richmond Green Belt performs against those NPPF Green Belt purposes deemed relevant in this context (i.e. purposes 1-3), using strategic land parcels (General Areas) as a unit of analysis. The five General Areas were assessed to meet the purposes strongly and all land was recommended for retention. Ensuring maximum protection for Green Belt in line with national policy, should continue to be a core planning principle in the formulation of Local Plan policy and a key consideration in the development of the future growth strategy for the borough.

As no weakly performing General Areas have been identified, this stage 1 Green Belt assessment has not identified a need for further refined assessment. However, if during the Council's call for sites, Green Belt sites are proposed, it may be necessary to undertake a more refined assessment of these sites to determine whether such sites would be acceptable in Green Belt terms.

Further if during the preparation of the emerging Local Plan, it becomes apparent that LBRuT cannot meet identified housing or employment land requirements, it may be necessary to further consider whether exceptional circumstances exist to support targeted release of Green Belt in line with a sustainable development approach.

If any Green Belt release is proposed, it will be necessary to consider compensatory improvements in line with NPPF paragraph 142. The PPG¹⁷ suggests that such improvements should be informed by ‘supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.’

The PPG¹⁸ further states that such improvements will require early engagement with landowners and other interest groups and consideration of the scope of works required to implement improvements (such as new rights of way or habitat creation). Improvements should be secured through the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy.

7.2 MOL

MOL covers a significant proportion of the borough (51.9%) and is thus a significant influence on the character and development potential within LBRuT. Although there are pockets of development within the MOL, the majority of the land exhibits openness and low levels of built development, which are considered key characteristics of MOL.

This study considered how well Richmond’s MOL performs against the four London Plan criteria, again using strategic land parcels (‘General Areas’) as a unit of analysis. While the majority of the MOL is performing strongly (38 General Areas), part / whole of 11 General Areas were found not to meet the MOL criteria. As noted above, it is important to note that the conclusions reached in this study do not automatically result in the release of this land from MOL and that further decision making by the Council in developing the Local Plan will determine,

¹⁷ Planning Policy Guidance Paragraph: 002 Reference ID: 64-002-20190722, Revision date: 22 07 2019

¹⁸ Planning Policy Guidance Paragraph: 003 Reference ID: 64-003-20190722, Revision date: 22 07 2019

which if any, might be released from MOL. It is recommended that these areas for further consideration are assessed as part of the Council's wider work to identify development sites / land and are tested through the Sustainability Appraisal process, as part of a robust approach to develop the future growth strategy for LBRuT.

Ensuring maximum protection for MOL, in line with London Plan policy, should continue to be a core planning principle in the formulation of Local Plan policy and a key consideration in the development of the future growth strategy for the borough. If during the preparation of the emerging Local Plan, it becomes apparent that LBRuT cannot meet identified housing, employment or other land requirements, it may be necessary to further consider whether exceptional circumstances exist to support targeted release of MOL in line with a sustainable development approach. In this context, it is also recommended that further assessment of any MOL sites promoted through the Council's call for site process should be undertaken to ascertain potential harm to the intention and integrity of the MOL. This would form part of the Council's evidence base to determine which land is more suitable and preferable for development.

If any MOL is proposed for release, compensatory improvements to the remaining MOL should be identified in line with NPPF paragraph 142 (regarding compensatory improvements to Green Belt, as discussed above in section 7.1) and the London Plan paragraph 8.3.4, which supports proposals to enhance access to and quality of MOL. The London Plan identifies examples of appropriate improvements, including 'inclusive design, recreation facilities, habitat creation, landscaping improvement and flood storage.' Within each of the assessment proformas, where relevant, opportunities to enhance or restore MOL have been identified – these could form the basis of any strategy to deliver compensatory improvements within LBRuT. With the anticipated Autumn 2021 Environmental Bill, there may also be opportunities to link this wider work on nature recovery and biodiversity net gain.

7.3 LGS

There is currently only one LGS within Richmond. This study considered whether 13 proposed LGS meet NPPF criteria. An initial sieve was applied to discount sites which are clearly not able to meet NPPF criteria regarding community proximity, scale, existing allocations and planning permission. One site was discounted on this basis (due to an existing allocation and live planning applications). The remaining 12 sites were assessed in terms of their local significance, as defined in the NPPF and 11 sites were found to meet this criterion.

Five of the 11 sites are already designated MOL and it was therefore judged that that there would not be any additional local benefit gained by adding a further designation to the site as LGS. As such, despite scoring strongly overall these sites were not recommended for further consideration as LGS.

The conclusion of this assessment was that there are six potential sites that may be suitable for LGS designation. As noted above, it will be for the Council to determine as part of the development of the Local Plan whether these sites are

taken forward as LGS. It is recommended that the Council supplement this assessment with further technical or contextual information demonstrating how these sites are special to the local community. This could include gauging community value further if the sites are taken forward through the Local Plan, for example during Regulation 18 consultation. This may ultimately lead to different conclusions. The Council should also give further consideration as to whether the existing designations, (for example, public open space), offer sufficient protection, or whether additional benefit, would result from an LGS designation.

The one weakly performing proposed LGS, as well as one of the six recommended sites that is Council owned, were also assessed against OOLTI criteria. Both sites were found to meet the criteria and recommended for further consideration as to whether the Council judges this to be an appropriate designation for this land.

7.4 OOLTI

OOLTI presently covers 2.26% of the borough and is made up of many small-scale open spaces, which form an important part of the multi-functional green infrastructure network. This study considered how well the existing 168 OOLTI meet the Local Plan Policy LP14 OOLTI criteria. The majority of sites were found to meet the criteria, with only three sites considered to be weakly performing. As for the other open spaces, it will be for the Council to determine how to take forward these assessment findings.

The study brief noted that there are also various stretches of back garden land designated as OOLTI, however, given the Government's expansion of permitted development rights, asked that consideration to be given as to whether these two elements are compatible / practicable.

The OOLTI designation would not affect ability to develop under permitted development rights (only article 2(3) land is restricted – i.e. conservation areas, AONB World Heritage Sites etc). However, as currently drafted this may not be apparent to the public using the Local Plan. Therefore, it is recommended that Policy LP14 is updated to cross-reference permitted development rights as suggest below.

[In addition to permitted development rights,] *'It will be recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria will be taken into account when assessing whether development is appropriate:*

a. it must be linked to the functional use of the Other Open Land of Townscape Importance; or

b. it can only be a replacement of, or minor extension to, existing built facilities; and

c. it does not harm the character or openness of the open land.

Appendix A

Glossary of Terms

A1 Glossary of Terms and Acronyms

Term	Definition
BAP	Biodiversity Action Plan A BAP describes biological resources in an area and provides detailed plans for conservation of these resources.
Countryside	Open land with an absence of built development and characterised by rural land uses including agriculture and forestry.
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)
Duty to Cooperate	A legislative requirement in the Localism Act 2011 which places a duty on Local Planning Authorities and County Councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.
Enclosed	Almost entirely contained or surrounded by built development.
Encroachment	A gradual advancement of urbanising influences through physical development or land use change.
Essential Gap	A gap between settlements where development would significantly reduce the perceived or actual distance between them.
GIS	Geographic Information System
GBR	Green Belt Review
General Area	Strategic land parcel within Green Belt or MOL defined for assessment purposes in this study.
GLA	Greater London Authority
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.
Independent Examination	The process by which a planning inspector may publicly examine a Development Plan Document (DPD) or a Statement of Community Involvement (SCI), in respect, before issuing a binding report. The findings set out in the report of binding upon the local authority that produced the DPD or SCI.

Term	Definition
Irregular	In relation to the assessment against purpose 1, 'irregular' boundaries are those comprising ill-define or softer edges to where large built-up areas are bounded by less durable, 'softer' features. Examples include: Infrastructure: private/unmade road; bridleway/footpath; power line. Natural: field boundary/weak tree line.
Large Built-Up Area	Areas defined to correspond to the major settlements identified in the respective LBRuT and neighbouring local authorities that border the borough and used in the NPPF purpose 1 assessment.
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
LBRuT	London Borough of Richmond upon Thames
Less Essential Gap	A gap between settlements where development is likely to be possible without any risk of coalescence between them.
LGS	Local Green Space
LNR	Local Nature Reserve
MOL	Metropolitan Open Land
NATURA 2000	The network of nature protection areas within the European Union, made up of Special Areas of Conservation and Special Protection Areas.
NCR	National Cycle Route
Neighbouring Town	Refers to neighbourhoods within LBRuT and the Greater London built-up area, as well as settlements in neighbouring authorities immediately adjacent to the borough's Green Belt, for the assessment against NPPF purpose 2.
NNR	National Nature Reserve (NNR)
NPPF	National Planning Policy Framework
Open Land	Open land refers to land that is lacking in built development.
Openness	Openness refers to the extent to which Green Belt land could be considered open from an absence of built development.
OOLTI	Other Open Land of Townscape Importance Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area. These areas can include public and private sports grounds, some school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. OOLTI is a local policy and new designations are made by the Council as part of the plan-making process.
OS	Ordnance Survey
OSNI	Other Site of Nature Importance Other Sites of Nature Importance, as identified on the Policies Map, are sites which have either been classified as having importance for biodiversity (regionally known as Sites of Importance for Nature Conservation) or the potential to have biodiversity.
PAS	Planning Advisory Service
PROW	Public Right of Way

Term	Definition
PPG	Planning Practice Guidance
RAMSAR	Ramsar are wetland on international importance that have been designated under the criteria of the Ramsar Convention on Wetlands.
Regular	In relation to the assessment against purpose 1, 'regular' boundaries are those comprising well defined or rectilinear built-form edges or where the large built-up areas are bounded by more durable features that are likely to be permanent. Examples included: Infrastructure: motorway; public and man-made road; railway line; river. Landform: stream, canal or other watercourse; prominent physical feature (e.g. reservoir embankment); protected/strongly established woodland/hedge/tree line; existing development with strongly established and regular boundaries.
SAC	Special Area of Conservation A SAC protects one or more special habitats and / or species – terrestrial or marine – listed in the EU Habitats Directive.
SINC / SMI	Site of Importance for Nature Conservation SINCs are sites which are recognised as being of particular importance to wildlife and biodiversity. 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. Also known nationally as Local Wildlife Sites.
SNCI	Site of Nature Conservation Interest SNCIs are sites which contain features of substantive nature conservation value at a local level.
SPA	Special Protection Area A SPA protects one or more rare, threatened or vulnerable birds species listed in Annex 1 of the EU Birds Directive, and regularly occurring migratory species.
Sprawl	The outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way.
SSSI	Special Site of Scientific Interest SSSI are areas of special interest due to their fauna, flora, geological or physiographical features.
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.
UPPF	Udney Park Playing 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 Gap	A gap between settlements where limited development may be possible without coalescence between them.

Appendix B

Context Review

This appendix establishes the context for the GB, MOL, LGS and OOLTI review within the LBRuT. It explores planning policy relating these designations, as well as reviewing guidance and experience elsewhere in terms of other reviews and legal precedents to set out key implications for this Study.

B1 Green Belt

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.

B1.1 National Planning Policy Framework

National Green Belt policy as set out in the 2021 NPPF places ‘great importance’ on the Green Belt, and seeks its protection through preventing urban sprawl and keeping land permanently open (paragraph 137). The NPPF defines Green Belt’s essential characteristics as its ‘openness’ and ‘permanence’ (paragraph 137).

Green Belt is considered to have five key purposes (paragraph 138), these are:

- To prevent unrestricted sprawl of large urban areas;
- To prevent neighbouring towns merging into one another;
- To contribute to the safeguarding the countryside against encroachment;
- To preserve the special character and setting of historic towns; and
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The general extent of Green Belts across the country including in LBRuT is already established. Established Green Belt boundaries should ‘only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans’ (paragraph 140).

This will be assessed at an examination considering whether:

- Brownfield and underutilised land have been made as much use of as possible;
- Minimum density standards have been achieved in town and city centres; and
- There have been discussions with neighbouring authorities about whether they could accommodate some of the required development.

Paragraph 140 continues that strategic policies should establish the need for any changes to Green Belt boundaries, having regard to this intended permanence in the long term.

The NPPF requires authorities to consider sustainable patterns of development by directing development into urban areas (paragraph 142). This includes ensuring the redevelopment of brownfield land is maximised and density of development is optimised before amendments to Green Belt boundaries are considered. There is also a requirement to demonstrate how any removal of Green Belt land will be compensated through improvements to the quality and accessibility of remaining areas of Green Belt (paragraph 142).

When defining Green Belt boundaries, of note is paragraph 143 (a), (b) and (f) that states that plans should:

- ‘(a) ensure consistency with the development plan’s strategy for meeting identified requirements for sustainable development;
- (b) not include land which it is unnecessary to keep permanently open...; and
- (f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.’

B1.2 London Plan

The London Plan (2021) includes Policy G2 London’s Green Belt, which affirms the Mayor’s strong support for the continued protection of London’s Green Belt. Policy G2 sets out the following:

- A The Green Belt should be protected from inappropriate development:
 - 1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,
 - 2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.
- B Exceptional circumstances are required to justify the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.

The London Plan refers to the NPPF and the clear direction for management of development within the Green Belt and the processes and considerations for defining Green Belt boundaries that it provides. The policy sets out the multi-function benefits of the Green Belt for London, such as combating the urban heat island effect, growing food, and providing space for recreation.

The openness and permanence are noted as the essential characters of the Green Belt, however it is acknowledged that some parts of the Green Belt have become derelict and unsightly and do not provide significant benefits to Londoners. The policy however states that this is not an acceptable reason to allow development to take place. In these areas, the Mayor will work with boroughs and other strategic partners to enhance access to improve the quality of these area in ways that are appropriate within the Green Belt.

B1.3 Local Plan

The LBRuT Local Plan (2018) Policy LP 13, refers specifically to ‘Green Belt, Metropolitan Open Land and Local Green Space’. The policy states that such land will be protected and retained in predominately open use.

Inappropriate development will be refused unless ‘very special circumstances’ can be demonstrated that clearly outweigh the harm to the Green Belt or MOL. Appropriate uses for Green Belt and MOL include private and open spaces,

playing fields, open recreation and sport, biodiversity including rivers and bodies of water open community uses including allotments and cemeteries. Development will be supported if it is appropriate and improves the Green Belt or MOL. The policy acknowledges that small structures which are considered inappropriate development may be acceptable in exceptional cases.

Improvements and enhancements to the openness and character of the Green Belt and MOL in addition to measures to reduce visual impacts will be encouraged. Development on sites outside the Green Belt or MOL will be considered with regards to their impacts on the character and openness of the Green Belt or MOL.

There is a footnote to paragraph 5.2.3 in the Local Plan which refers to the land at Twickenham and Fulwell golf courses, which is held under the 1938 Green Belt Act. Under this Act owners are required to request permission from the Secretary of State to build on or dispose of this land. This requirement is separate from and in addition to any requirements for planning permission. Most of this land (i.e. at Twickenham and Fulwell golf courses) is protected in the adopted Local Plan by its designation as MOL.

B1.4 Planning Practice Guidance

The national Planning Practice Guidance (PPG) provides supplementary guidance on the requirements of the planning system presented in the NPPF.

Although the PPG section relating to Green Belt, provides no guidance on how to conduct a Green Belt Review, it does include details on how to assess the impact of potential development on Green Belt Land. These are given as:

- The impact of the proposal on the spatial and visual aspect of openness;
- The duration of the development and its remediability (e.g. any provisions to return the land to original state or similar); and
- The degree of activity, such as traffic, likely to be generated by the development.

It provides guidance on the assessment of openness, which is relevant to assessing Green Belt performance. The PPG sets out that openness is capable of having both spatial and visual aspects- in other words, the visual impact of development is relevant, as well as its volume.

Further guidance is also provided on strategies to compensate for the removal of land from the Green Belt. Strategies could include providing new or enhanced green infrastructure, planting new woodlands, landscape or visual enhancement beyond those needed to mitigate the proposal, habitat improvements, new walking or cycling routes or new or enhanced recreational provision. Whilst implementing such measures, the guidance states that consideration will need to be given to land ownership, the scope of works required to deliver the compensation, and the use of planning conditions, section 106 agreements or Community Infrastructure Levy.

B1.5 Planning Advisory Service Guidance

The Planning Advisory Service (PAS) published guidance¹⁹ for Green Belt Assessment. Emphasis is placed on the need for assessment against the five purposes of the Green Belt in the first instance. The guidance acknowledges that there are planning considerations, such as landscape quality, which cannot be a reason to designate an area as Green Belt, but that could be a planning consideration when seeking suitable locations for development.

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

- Purpose 1: to check the unrestricted sprawl of large built up areas –consider the meaning of sprawl compared to 1930s definition, and whether positively planned development through a local plan with good masterplanning would be defined as sprawl.
- Purpose 2: to prevent neighbouring towns from merging into one another - the purpose does not strictly suggest maintaining the separation of small settlements near to towns. The approach will be different for each case. The identity of a settlement would not be determined solely by the distance to another settlement; the character of the place and of the land in between must be taken into account. A ‘scale rule’ approach should be avoided. Landscape character assessment is a useful analytical tool for this type of assessment.
- Purpose 3: to assist in safeguarding the countryside from encroachment – Seemingly, all Green Belt achieves this purpose. The recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open, accounting for edges and boundaries.
- Purpose 4: to preserve the setting and special character of historic towns - it is accepted that in practice this purpose relates to very few settlements as a result of the envelopment of historic town centres by development.
- Purpose 5: to assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of potentially developable land within urban areas must have already been factored in when Green Belt land was initially identified. It is considered that all Green Belt achieves this purpose to the same extent, and that the Green Belt value of parcels when assessed against purpose 5 is unlikely to be distinguishable.

The NPPF requires local planning authorities to work collaboratively on strategic matters that cross administrative boundaries (paragraph 24). The PAS guidance recognises that Green Belt is a strategic policy and hence a strategic matter in terms of the duty to cooperate.

¹⁹ PAS (2015) Planning on the Doorstep: The Big Issues

B1.6 Legal Precedents

B1.6.1 Planning Appeals

It is useful to examine case law as it provides guidance on the interpretation of key terms / concepts within the NPPF. It is important to consider the impact of these judgements on Green Belt assessment methodologies and interpretation of assessment since Inspectors may consider this at Independent Examination– as was the case in North Herts, where the Council was asked to review Green Belt outcomes with respect to recent judgements.

There have been various appeals that have highlighted the important considerations surrounding the interpretation of ‘openness of the Green Belt’ and are therefore relevant to the assessment of the land against Green Belt purposes (in particular purpose 3).

The Turner judgement (2016)²⁰ highlighted important considerations surrounding the openness of the Green Belt. The judgment states that 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. Greenness is also a visual quality, and the preservation of the visual openness should also be considered.

‘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.’

Appeal cases in Three Rivers²¹ and Cheshire West and Chester²² 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. ...

²⁰ Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin)

²¹ Planning Inspectorate (2018) *Appeal Ref: APP / P1940/W/17/3183388* – Clovercourt Ltd v Three Rivers District Council

²² 17 The Planning Inspectorate (2018) *Appeal Ref: APP/ A0665/ W/ 17/ 3190601* – Clegg v Cheshire

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 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 State²³ 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. 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 note²⁴ 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 the NPPF (paragraph 137).
- The key element to assess is the effect that a development has on the openness of the Green Belt.

²³ 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

²⁴ 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

- 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.

The Supreme Court in *R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council* [2020] UKSC 3²⁵ has recently provided important clarity as to the interpretation of the openness of the Green Belt and the relationship between 'openness' and 'visual impact' within the planning judgement of the decision maker. The judgment highlighted the important distinction in planning decisions between planning judgement and legal interpretation of planning policy. While visual impact may in the context of a particular case be judged a relevant factor by a decision maker in assessing openness of the Green Belt it, in itself, will not be a strict nor mandatory determinative factor.

On the interpretation of 'openness' and the issue of 'visual impact' it was noted that:

'The concept of "openness" in para 90 of the NPPF [now para 137] seems to me a good example of such a broad policy concept. It is naturally read as referring back to the underlying aim of Green Belt policy, stated at the beginning of this section: "to prevent urban sprawl by keeping land permanently open ...". Openness is the counterpart of urban sprawl and is also linked to the purposes to be served by the Green Belt. As PPG2 made clear, it is not necessarily a statement about the visual qualities of the land, though in some cases this may be an aspect of the planning judgement involved in applying this broad policy concept. Nor does it imply freedom from any form of development.'

Importantly, the Supreme Court re-enforced the importance of planning judgement within the role of the decision maker by stating:

'[Openness] is a matter not of legal principle but of planning judgement for the planning authority or the inspector.'

B1.6.2 Independent Examinations

Local Plan Examination Inspector's Reports provide useful pointers on the implications of national policy. At the time of the Stage 1 GBR, Inspectors Reports focussed on recommendations for undertaking comprehensive Green Belt Reviews. Subsequent to this more recent Independent Examinations of Local Plans have focused on more detailed points regarding the methodology employed within such studies.

B1.6.3 Redbridge (2018)²⁶

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

²⁵ Further information available here: <https://www.supremecourt.uk/cases/uksc-2018-0077.html>

²⁶ 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

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 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.’

B1.6.4 Wycombe (2019)²⁷

The Inspector indicated support for the Green Belt assessment method, as being consistent with the requirements of the NPPF.

‘93. As such, I am satisfied that both the Green Belt Assessments, as they relate to Wycombe District, provide a sound and robust evidence base which are consistent with the requirements of the NPPF and afford a basis for the enduring Green Belt boundaries shown on the policies map.’

B1.6.5 Runnymede (2020)²⁸

The Inspector described the Green Belt review as ‘comprehensive, systematic and based on a robust, consistently applied methodology that properly reflected local circumstances and the unique characteristics of the borough.’ The Inspector commended the staged approach to assessment and the fact that the process took account of good practice advice and experience elsewhere.

‘68. The Green Belt review was undertaken as a series of complementary studies and carried out in stages that examined it first at a strategic level, and then at a more fine-grained level to assess the performance of smaller parcels of land against Green Belt purposes; the studies also included a Green Belt Villages review and a technical review of the Green Belt boundaries. The overall process took account of good practice advice from the Planning Advisory Service, comparator studies carried out by other local planning authorities whose plans were found sound, and Landscape Institute advice on landscape visual assessment.

I consider the robustness of the Green Belt review and the justification for the proposed release of land in more detail in Issues 3 and 4 below in relation to the Plan’s site allocations. In summary, I have concluded that the review was comprehensive, systematic and based on a robust, consistently applied methodology that properly reflected local circumstances and the unique characteristics of the borough in assessing how the Green Belt serves the purposes laid down in national planning policy.

69. The review responds to the Council’s strategy to only consider sites for release from the Green Belt that can be shown to perform most weakly against the purposes of including land within it. This is a justified approach which is consistent with national planning policy by ensuring that maximum protection is given to the Green Belt. And in this and all other respects, I have concluded that the approach to the Green Belt review

²⁷ Nicola Gulley (2019) Report on the Examination of the Wycombe District Local Plan

²⁸ Mary Travers, The Planning Inspectorate (2020) Report on the Examination of the Runnymede 2030 Local Plan

and the basis on which the Council selected the Plan's spatial strategy accords with the Calverton judgement.

70. Furthermore, the methodology was developed in a systematic and rigorous way, working with the surrounding local planning authorities and taking account of responses to the published evidence and the Issues, Options and Preferred Approaches consultation (Regulation 18). The assessment criteria and scoring matrices are clearly explained and justified and the scores for each Green Belt purpose were rightly considered individually, given the importance of understanding the roles that different areas of land play in serving particular purposes at the strategic and local scales.

71. Purposes 4 and 5 as set out in paragraph 80 of NPPF [now paragraph 138] were excluded from the assessment for good reason; purpose 4 is not relevant to Runnymede and the settlements immediately beyond the borough's boundaries, and purpose 5 applies to all parts of the Green Belt to the same extent and has already been taken into account before identifying any potential need to release land from the Green Belt. And as part of the more fine-grained assessment carried out in the Stage 2 review, the definition of buffers around settlements was carefully considered, informed by the nature of the borough's Green Belt, and was a proportionate, suitably focused and justified approach.

72. The review did not seek to balance Green Belt purposes with other sustainability objectives; correctly, the Council considered the balancing exercise within the wider context of all the site selection evidence, and it has set out its reasons for selecting the allocations in the Site Selection Methodology Assessment (SSMA). In a very limited number of cases the Council disagreed with the recommendations of the Green Belt review, which was carried out by consultants, and its reasons for doing so are explained in the SSMA. Based on all the evidence and my site visits, I have found that the Council's conclusions are reasonable and justified.'

B1.6.6 York²⁹

The Inspectors initial observations of the proposed Local Plan were that it was 'not clear... how the Council has approached the task of delineating the Green Belt boundaries' and 'no substantive evidence has been provided setting out the methodology used and the decisions made through the process.'

Following the phase one hearings, the Inspectors described the approach taken to delineating the proposed Green Belt boundaries as 'far from straightforward' and considered that a 'simpler methodology could have avoided some of the concerns' raised.

'48. Given our views set out above, we consider that there are elements of the approach taken to delineating the Green Belt boundaries that are not adequately robust. Indeed, in our opinion, there are intrinsic flaws embedded in the methodology. Consequently, whilst as detailed in paragraph 29 above we are satisfied that the boundaries are, as a matter of broad principle at least, in general conformity with the RSS, we have serious concerns about the justification for the precise Green Belt boundaries proposed in the Local Plan, particularly in terms of their consistency with the NPPF.

²⁹ Simon Berkeley and Andrew McCormack, Inspectors (12 June 2020), Letter to the City of York Council on the Examination of the City of York Local Plan ; Simon Berkeley and Andrew McCormack, Inspectors (24 July 2018), Letter to the City of York Council, *Examination into the soundness of the city of York Local Plan*

49. We are not currently in a position to conclude on the soundness of the Local Plan in relation to this issue. This is because we have not scrutinised the Green Belt boundaries proposed in detail through hearing sessions. As such, we are currently unclear about precisely how, or the extent to which, the flawed elements of the methodology have influenced the outcome. As a consequence, we cannot presently tell whether the Green Belt boundaries proposed in the Local Plan are sound. However, we have concerns that they may not be because of the shortcomings of the methodology.'

B1.7 Experience Elsewhere

Table B1.1 provides a summary of Stage 1 Green Belt reviews undertaken by authorities neighbouring LBRuT and elsewhere. It provides a brief overview of the methodology taken, including the identification of assessment parcels.

It should be noted that the timescales for undertaking the Green Belt reviews pre-date the 2021NPPF, whilst others have not been subject to Independent Examination. In identifying good practice from the approaches adopted by other authorities, these factors should be taken into account to ensure the methodology adopted is sound and reflects the latest requirements of the NPPF.

A brief examination of a selection of Green Belt Assessments carried out elsewhere in the country, focussing specifically on Stage 1 assessments undertaken in boroughs near to LBRuT, revealed the following key lessons in terms of methodology:

- A two stage process has typically been used to firstly identify the most weakly performing Green Belt areas (i.e Stage 1), before moving onto a second stage to consider Green Belt performance for smaller scale areas (i.e Stage 2).
- For the purposes of the assessment, authorities have primarily divided the Green Belt into land parcels for assessment using durable, significant and strong physical boundaries which are clearly defined in the methodology, though some have used grid squares of a defined size to identify the land parcels for assessment.
- Assessments have considered both the strategic and local roles of the Green Belt.
- Only those purposes deemed relevant to the local context have been used in assessments rather than necessarily using all five, while in some instances authorities have combined multiple purposes within their assessments.
- In terms of interpreting the national purposes, definition of terms (both within the purposes themselves and criteria applied) is of key importance to a successful and transparent assessment.
- Assessment criteria used to assess individual purposes have been tailored to local circumstances.
- Qualitative approaches are primarily used in assessments, although some authorities have used more quantitative measures. The approach to scoring in assessments varies from simplistic traffic light systems to more complex approaches to scoring.

Table B1.1 Experience Elsewhere – Stage 1 GBR

Local Authority	Study	Status	Summary of Approach
Elmbridge Borough Council	Green Belt Boundary Review Review of Absolute Constraints	Published 2016 (Arup study)	<p>The Green Belt Boundary Review (GBBR) was undertaken in two tiers:</p> <ul style="list-style-type: none"> - Broad areas for a Strategic Green Belt Assessment were identified through commonalities in landscape character, boundary features and functional connections to the wider Metropolitan Green Belt. - More granular parcels were identified for the Local Green Belt Area Assessment against NPPF purposes. <p>The GBBR concluded that, overall, the Elmbridge Green Belt is performing well in terms of NPPF Green Belt purposes however it was recommended the following for Local Areas:</p> <ul style="list-style-type: none"> - Those which perform weakly could be considered against constraints to development and whether ‘exceptional circumstances’ exist to justify alterations to the Green Belt boundary; - Moderately or strongly performing Local Areas could be considered for sub-division to identify weakly performing sub-areas; - Consider amending the Green Belt boundary to include non-Green Belt areas which could be considered for inclusion in the Green Belt; - Anomalous boundaries could be amended to ensure consistency and permanence of Green Belt boundaries. <p>A Review of Absolute Constraints subsequently considered all parcels of land identified through the GBBR against a series of ‘absolute’ constraints.</p>
London Borough of Hillingdon	The Green Belt and Major Developed Sites Assessment	Published 2006	<p>The review was undertaken pre-NPPF publication; although Planning Policy Guidance Note 2 (Green Belts) set out the same Green Belt purposes contained in the NPPF.</p> <p>The assessment did not review all land designated as Green Belt in the borough. It assessed:</p> <ul style="list-style-type: none"> - Sites examined during the previous UPD Review; - Submissions received in response to an initial UDP consultation in 2001 and submissions received since that time; - Sites identified in the Metropolitan Open Land and Green Chains Assessment 2005; and - Sites identified by officers which could benefit from Green Belt designation and sites in the Green Belt which do not meet the purposes of the Green Belt. <p>The assessment used PPG2 to identify indicators for Green Belt boundary alteration, deletion or inclusion using the purposes of Green Belt as outlined in PPG2 and the inclusion of specific guiding indicators for each purpose of PPG2.</p>
	Green Belt Assessment Update	Published 2013	<p>This review was undertaken as an update to the Green Belt review published in 2006. It does not seek to identify significant changes to Green Belt boundaries within the borough. Instead, minor adjustments are proposed where sites do not meet the purposes of including land within the Green Belt, as set out in the Government's NPPF. The study follows a similar</p>

Local Authority	Study	Status	Summary of Approach
			methodology to the Green Belt review undertaken 2006, albeit that updates have been made to take account of changes in national planning policy and the additional sites that have been submitted as part of the production of the Local Plan Part 2.
London Borough of Hounslow	London Borough of Hounslow Green Belt Review (2015)	Published 2015 (Arup study)	<p>Green Belt review formed part of the evidence base for the West of Borough Plan. The review was undertaken in two phases:</p> <ul style="list-style-type: none"> - Phase 1A assessed strategic land parcels against the purposes of the Green Belt as defined in the NPPF to identify the relative performance of Green Belt 'General Areas'. - Phase 1B appraised the Green Belt in terms of Landscape Quality and Context. The General Areas and their performance against NPPF purposes were then subject to a Landscape Appraisal to identify sites suitable for release from or inclusion within the Green Belt. <p>28 General Areas were assessed against NPPF Green Belt purposes 1-3 with all meeting one or more of the purposes to varying degrees. Two General Areas scored particularly weakly across all purposes.</p>
Royal Borough of Kingston upon Thames	Green Belt and Metropolitan Open Land Assessment	Published 2018	The Assessment covers all of the Green Belt and MOL across the Borough. In the Assessment, the Green Belt was split into 17 parcels and consideration was given to both the strategic and local roles of the Green Belt. The assessment sets out how the Green Belt purposes 1 – 5 have been applied in the Assessment. The results of the Assessment demonstrated the widespread meeting of Green Belt purposes.
Royal Borough of Windsor and Maidenhead	Green Belt Boundary Study	Published 2009	<p>A review of Green Belt boundaries around the Borough's excluded settlements to rectify any inconsistencies and to assess areas with potential land to be included within the Green Belt was carried out. In assessing land around the excluded settlements, two principles were followed:</p> <ul style="list-style-type: none"> - Boundaries should follow a permanent physical feature on the ground that creates a logical, strong and defensible boundary. - Open space at the edge of a settlement should generally be incorporated into the Green Belt. <p>25 additional locations (equivalent to 55ha) were recommended for inclusion in the Green Belt.</p> <p>The study was conducted pre-NPPF publication; although Planning Policy Guidance Note 2 (Green Belts) set out the same Green Belt purposes the same as NPPF.</p>
	Green Belt Purpose Analysis	Published 2013	<p>Analysed the contribution made by land against the five purposes of the Green Belt as set out in the NPPF. The whole of the Borough with the exception of the larger settlements is covered by the Green Belt designation. The Green Belt was divided into 500m x 500m land parcels.</p> <p>Each land parcel was assessed against a series of criteria for each of the purposes and scores between 0 and 5 assigned. In summary the criteria used for each purpose were:</p> <ol style="list-style-type: none"> (1) Distance from excluded settlement; and contribution to preventing ribbon development. (2) Distance between excluded settlements.

Local Authority	Study	Status	Summary of Approach
			<p>(3) Nature conservation value; River Thames corridor; presence of trees and woodland; agricultural land classification; and landscape quality.</p> <p>(4) Setting of Windsor Castle and Eton College; and presence of historic assets.</p> <p>(5) Contribution to urban regeneration; and distance to rejuvenation opportunities.</p> <p>The review concluded that all land in the adopted Green Belt achieves at least 3 of the 5 Green Belt purposes, thus there was no case for altering the boundary unless exceptional circumstances were demonstrated through Local Plan process.</p>
	Edge of Settlement Analysis	Published 2014	<p>Analysed potential for development of Green Belt land adjoining the Borough's settlements as analysis of housing demand and supply indicated a shortfall within the Borough over the Local Plan period. A three stage approach used:</p> <ul style="list-style-type: none"> - Stage 1: Land assessed against strategic constraints (environmental, infrastructure, ownership, settlement gap, heritage assets). Unsuitable land was not considered further. - Stage 2: Assessed remaining sites against a range of objective and qualitative criteria (contribution to gaps between settlements and defensibility of boundaries, countryside character and topography of land, agricultural land classification Grades 1 and 2, local nature designations and Ancient Woodland, heritage assets and their setting, pollution and minerals safeguarding zones), with pass / fail / part-pass conclusion. - Stage 3: Assessed against detailed criteria (Green Belt and countryside setting, settlement and townscape character, historic environment, biodiversity, flood risk, other environmental considerations, resources, infrastructure, highways and accessibility, sustainability and availability). <p>Twenty-three areas were identified as potential sites for release from the Green Belt.</p>
	Preferred Options Consultation	Published 2014	<p>The Preferred Options Consultation, considered both the additional land to be designated Green Belt and the 23 potential sites in the Green Belt located on the edge of settlements for release for development.</p>
	Report to Cabinet	Published 2015	<p>Following the preferred options consultation of the Borough Local Plan, it was resolved unanimously at a meeting of the authority's Cabinet in February 2015 that 21 of the 23 sites identified in the Edge of Settlement Analysis will not be considered further for release.</p> <p>Two sites will be taken out of the Green Belt.</p>
Runnymede Borough Council	Runnymede Borough Council Green Belt Review	2014 (Arup study)	<p>Phase 1 involved the identification of parcels based on the following features:</p> <ul style="list-style-type: none"> - M3 and M25 motorways; - A and B roads; - Railway lines; - River Thames; - River Wey.

Local Authority	Study	Status	Summary of Approach
			<p>The assessment of the areas identified in Phase 1 were then scored against the NPPF purposes of the Green Belt with a score of 1 to 5.</p> <p>In Phase 2, all parcels were then assessed against potential constraints. This stage then recommended which land parcels could potentially be released based on both whether they met the NPPF purposes and their strategic fit within the existing settlement hierarchy.</p>
<p>Spelthorne Borough Council</p>	<p>Green Belt Assessment Stage 1</p>	<p>2018 (Arup study) [Produced by Arup]</p>	<p>The Green Belt Assessment was undertaken in two tiers:</p> <ul style="list-style-type: none"> - Strategic Assessment – focusing on the primary purposes of wider functional areas of Green Belt in the Borough and their role within the wider sub-regional context of the Metropolitan Green Belt; - Local Assessment – which considered whether smaller areas fulfil the Green Belt purposes, as set out in the NPPF. <p>The Assessment concluded that while the majority of the Green Belt in Spelthorne is performing an important role in terms of NPPF purposes, a number of weaker areas were identified which may warrant further consideration. The areas for consideration were categorised as follows:</p> <ol style="list-style-type: none"> 1. Local Areas scoring weakly against all NPPF purposes which could be considered further. 2. Moderate or strongly scoring Local Areas where there is a 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, which could be afforded further consideration in accordance with the above provisions.

B2 MOL

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, the policy was adopted as ‘land within the built-up area’ that 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 2021NPPF (and its predecessors) contains no references to MOL. There is no guidance available on conducting a MOL review.

B2.1 London Plan

The London Plan (2021) includes Policy G3 on MOL. The policy explicitly states that MOL is

‘afforded the same status and level of protection as Green Belt.’

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 requires that any alterations to the boundary of MOL be undertaken through the Local Plan process. However, boundary alterations should only take place in exceptional circumstances, which must be fully evidenced and justified.

The policy states that to designate land as MOL it is necessary to demonstrate that the land meets at least one of the following criteria:

- ‘1. It contributes to the physical structure of London by being clearly distinguishable from the built-up area
2. It includes open area facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve the whole, or significant parts, of London
3. It contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
- ‘4. 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 explicitly states that additional stretches of the River Thames should not be designated as MOL. In considering whether there are exceptional circumstances to change MOL boundaries alongside the Thames and other ways, regard must be had to Policy SI 14 Waterways – Strategic Role and Policy SI 17 Protecting and Enhancing London’s Waterways.

B2.2 Local Policy

The LBRuT Local Plan (2018) Policy LP 13, refers specifically to ‘Green Belt, Metropolitan Open Land and Local Green Space’. The policy states that such land will be protected and retained in predominately open use.

Inappropriate development will be refused unless ‘very special circumstances’ can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land (MOL). Appropriate uses for Green Belt and MOL include private and open spaces, playing fields, open recreation and sport, biodiversity including rivers and bodies of water open community uses including allotments and cemeteries. Development will be supported if it is appropriate and improves the Green Belt or MOL. The policy acknowledges that small structures which are considered inappropriate development may be acceptable in exceptional cases.

Improvements and enhancements to the openness and character of the Green Belt and MOL in addition to measures to reduce visual impacts will be encouraged. Development on sites outside the Green Belt or MOL will be considered with regards to their impacts on the character and openness of the Green Belt or MOL

LBRuT policy (LP 13) on Green Belt and MOL, LGS and OOLTI are set out in the adopted Local Plan (2018). Local Plan Strategic Objective 3 under ‘protecting local character’ seeks to ‘protect and improved the borough’s parks and open spaces’.

Policy LP 12 acknowledges the value of Green Belt, MOL and OOLTI to the local area in their enhancement of the environment and being an attractive place for people to live, work and visit. This policy also highlights the role of the green infrastructure network in increasing the ability of the natural environment to adapt to climate change.

B2.3 Legal Precedents

A review of MOL appeals found that the case law reflects the London Plan’s assertion that MOL should be afforded the same level of protection as Green Belt. Key tests in Green Belt policy, such as the appropriateness of development or the ‘special circumstances’ in which development harmful to the Green Belt can be approved, have successfully been applied in cases concerning MOL.^{30 31}

Given that Green and MOL share many characteristics, for instance around openness and permanence, many legal precedents in section B1.6 also apply.

B2.4 Experience Elsewhere

Table B2.1 provides a summary of MOL reviews carried out by local authorities across London. The summary includes high level details of the methodology employed along with key findings.

³⁰ The Queen on the application of Heath & Hampstead Society and Alex & Thalys Vlachos and London Borough of Camden [2008] EWCA Civ 193.

³¹ Brown v London Borough of Ealing Council & Anor [2018] EWCA Civ 556 (23 March 2018)

It should be noted that the timescales for undertaking these MOL reviews pre-date the publication of the 2021 London Plan, whilst others have not been subject to Independent Examination. In identifying good practice from the approaches adopted by other authorities, these factors should be taken into account to ensure that the methodology adopted is sound and reflects the latest policy requirements.

In summary, the following key points can be noted:

- MOL reviews have typically been undertaken as joint assessments of either Green Belt, or other local open space designations.
- The majority of reviews have taken a criteria-based approach to assessment based on national or regional policy, with all recent reviews using the London Plan MOL designation criteria.

Table B2.1 Experience Elsewhere – MOL Reviews

Local Authority	Study	Status	Summary of Approach
LB Barnet	Green Belt and Metropolitan Open Land Study	Published 2018	A joint review of Green Belt and MOL in the borough. The primary aim of the Stage 1 assessment was to establish the variation in the openness of MOL based on the assessment criteria, drawing on the London Plan. The MOL within the Borough was broken up into discreet pockets of land for assessment. There were several potential minor boundary adjustments which were recommended to the existing MOL boundary to correct digitisation errors and realign boundaries along more permanent readily recognisable features. However, no pockets were recommended for removal from the designation. Two pockets of open land currently not designated as MOL or Green Belt were considered to have potential for designation as MOL. Two notable pockets of largely open Green Belt were considered to have potential for re-designation as MOL.
LB Croydon	Review of Metropolitan Green Belt and Metropolitan Open Land	Published 2016; Review in progress	A joint review of all Green Belt and MOL in the borough. The first part of the assessment reviews all designated sites against the MOL criteria set out in the London Plan, and a further section explores potential development options for any poorly performing sites. The review found one area of land that did not meet the requirements for MOL. A further three areas of Local Open Land abutting the Green Belt were proposed to be re-designated as MOL.
LB Enfield	Metropolitan Open Land & Green Chain Associated Open Space Review	Published 2013	A high-level review of MOL and Green Chain associated Open Space (GCOS). It reviewed the MOL boundaries, using GIS to 'tidy up' boundaries that needed adjustment due to land use changes since the previous iteration or past cartographical inconsistencies (due to the previous study being carried out before the invention of GIS). It was recommended that the borders of sixteen MOL sites should be amended for this reason. Two GCOS sites were recommended to be designated as MOL with a further seven GCOS sites recommended to be designated as MOL with additional boundary changes. One Local Open Space site was recommended to be designated as MOL.
LB Hillingdon	Metropolitan Open Land and Green Chains Assessment	Published 2004	The study assessed 3 MOL sites and 6 Green Chain sites against criteria developed by the study using national and regional policies. This was supported by a process of option development, with particular attention paid to the relationship between MOL and Green Chains and the large areas of designated Green Belt in the borough. The study recommended retaining two existing MOL sites, re-designating two existing MOL sites as Green Belt, and designating seven of 'Areas forming links in Green Chains' as MOL.
LB Hounslow	Hounslow Green Belt Review Stage 2	Published 2019 [Produced by Arup]	The study was a stage 2 Green Belt and MOL review, which aimed to assess the findings of the Stage 1 Green Belt review undertaken in 2015 to ensure compliance with the updated NPPF and further developing a draft Stage 2 Green Belt Review undertaken by the local authority in 2017. The Green Belt and MOL assessments followed two separate but complementary workstreams. A key focus of the MOL assessment was to establish whether Green Belt General Areas that perform poorly against the NPPF but provide important open space, could be re-designated as MOL. The areas identified for assessment were evaluated against the London Plan MOL criteria and an overall score was developed for each parcel. This was used to

Local Authority	Study	Status	Summary of Approach
			support the recommendations made for each site. The study recommended that three General Areas should be re-designated as MOL and six should be partially re-designated as MOL.
LB Lewisham	Review of Metropolitan Open Land	Published March 2020 [Produced by Arup]	The study assessed 32 MOL sites and an additional 6 areas for potential MOL designation against criteria developed by the study using national and regional policies. The study recommended retaining twenty-five existing MOL sites, further consideration of releasing 4 sites and partial release of three sites as well as further consideration of 2 new areas for MOL designation.
LB Richmond upon Thames	Review of Land Subject to Protective MOL and OOLTI designation	Published 2006	This study reviewed MOL, Green Belt, Green Chains and Other Open Land of Townscape Importance (OOLTI) in the borough. The study noted that the local authority was not open to removing designations from existing sites, but instead wanted to focus on increasing the number of designated sites in the borough. The first phase of the study involved reviewing existing designated sites and potential new sites using aerial photography. This process identified 88 new sites that may be suitable for designation, and these were taken forward for further assessment and a site visit. Sites were assessed against the criteria set out in the UDP policies. The MOL policy criteria are akin to the current London Plan MOL designation criteria in terms of their intent and scope. It was concluded that 38 of these sites were recommended as 'Highly Recommended' for designation, while 50 were recommended as 'Possible Designation'.
LB Sutton	Green Belt and Metropolitan Open Land Review	Published 2015	The study was prepared in support of an emerging Local Plan and aimed to assess whether Green Belt and MOL were performing adequately. The review included Stage 1 and Stage 2 assessments for Green Belt and MOL. The Stage 1 review assessed the Green Belt and MOL against criteria derived from the NPPF and London Plan respectively. The Stage 1 Review concluded that of the 30 MOL sites reviewed, 7 MOL sites were identified as poorly performing and suitable for 'Possible Release'. Poorly performing sites were then examined in further detail in Stage 2 of the assessment against criteria used elsewhere in the Local Plan preparation work to evaluate potential development sites through the call for sites process. The assessment found that 6 of the 7 poorly performing MOL sites were suitable for potential release, representing a loss of 13.13ha.
RB Greenwich	Towards a Greener Royal Greenwich – Green Infrastructure Study	Published 2017	A MOL review was undertaken as part of the borough's Green Infrastructure Study. The study aimed to audit existing provision of all types of green infrastructure and designated open space and inform decisions regarding allocating land for other forms of development. A desk-based study was used to audit each MOL site against the London Plan MOL criteria using OS maps and aerial photographs, and these were verified through a series of site visits. The review found that of the 1177.8ha of land currently designated as MOL within the borough, 1.8ha could be considered for exclusion. A further 10.9ha could be considered as meeting the criteria for MOL and should be considered for inclusion. The review included five suggested amendments to extend areas of MOL to include adjoining areas of open space. Two sites were recommended for exclusion as they were considered not consistent with MOL criteria.
RB Kingston Upon Thames	Green Belt and Metropolitan	Published 2018	This review was conducted in support of the development of a new Local Plan and covered all MOL and Green Belt across the borough. The study used both a desk-based and site-based assessment and compared each MOL site against the London Plan MOL criteria. It was found that significant areas of MOL that are identified as being significant to London as a whole,

Local Authority	Study	Status	Summary of Approach
	Open Land Assessment		such as those that provide context to the River Thames Strategic River Corridor. The assessment found that there were no MOL sites that made an overall limited contribution to the MOL criteria. Two additional sites were identified as being suitable for consideration for designation as MOL.
LB Waltham Forest	Focussed Green Belt and Metropolitan Open Land Assessment	Published 2019	This assessment comprised a review of the London Borough of Waltham Forest's Green Belt and Metropolitan Open Land (MOL) in 2014. With regards to MOL, the 2014 study assessed the contribution of the Borough's MOL to the characteristics set out in the London Plan (2011). By drawing out variations in contribution the study provided insight into the Borough's MOL likely to be the most appropriate to accommodate development, if required. It was, however, subsequently established through the findings of other sources of Local Plan evidence that the Borough's growth needs could be sustainably accommodated within the Borough's built-up area outside the MOL. This 2019 report focussed on three locations within the Borough's MOL (and Green Belt) identified by the Council and provided a more detailed assessment of the locations, drawing on the updates to London Plan and included an assessment of the 'harm' to the designations should all or part of the land be developed. In addition, the assessment reviewed the alignment of the Borough's existing MOL (and Green Belt) boundaries. Where the existing boundaries do not follow readily recognisable and permanent physical features, recommendations for minor boundary adjustments were made in line with paragraph 139 of the 2019 NPPF.

Notes: (1) The following authorities do not have a published MOL Review: LB Barking and Dagenham, LB Bexley, LB Brent, LB Bromley, LB Camden, LB Ealing, LB Hackney, LB Hammersmith and Fulham; LB Haringey, LB Harrow, LB Islington, LB Lambeth, LB Merton, LB Newham, LB Redbridge; LB Southwark, LB Tower Hamlets, LB Wandsworth, LB Westminster and RB Kensington and Chelsea. (2) The following authorities do not have MOL within the authority: City of London and LB Havering.

B3 LGS

B3.1 National Planning Policy Framework

The NPPF (2021) states that Local Green Spaces ‘should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period’ (paragraph 101) The designation of land as Local Green Space ought to be ‘consistent with the local planning of sustainable development and be complement investment in sufficient homes, jobs and other essential services’.

Paragraph 102 of the NPPF advises that a Local Green Space designation should only be used where the green space is:

- a) ‘in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and,
- c) local in character and is not an extensive tract of land.’

Paragraph 103 states that policies for managing development within a Local Green Space should be consistent with those for Green Belts.

B3.2 Local Plan

Local Plan Policy LP13 protects LGS which has been demonstrated to be special to a local community and which holds particular local significance from inappropriate development that could cause harm to its qualities. The following criteria are taken into account when defining Local Green Space:

- The site is submitted by the local community.
- There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation.
- The site is not land allocated for development within the Local Plan.
- The site is local in character and is not an extensive tract of land.

Natural England’s Accessible Natural Greenspace Guidance accessibility standards acknowledge the role of LGS as a unifying element for disparate communities.

B3.3 Planning Practice Guidance

The Planning Practice Guidance (PPG) provides supplementary information on the approach to LGS designation. The PPG states that such designation ‘is a way to provide special protection against development for green areas of particular

importance to local communities;³² and outlines that land is designated as LGS in Local or Neighbourhood Plans.³³

Designation of LGS must be consistent with local planning for sustainable development in the area. Plans must identify sufficient land in suitable locations to meet identified development needs and the LGS designation should not be used in a way that undermines this aim of plan making³⁴. The guidance goes on to state that the designation will rarely be appropriate for land, which already has planning permission for development³⁵.

LGS may be designated where those spaces are demonstrably special to the local community³⁶.

If land is already protected by Green Belt or MOL policy or other designations (such as SSSI, Scheduled Monument or Conservation Areas), then consideration should be given to whether any ‘additional local benefit’ would be gained by designation as Local Green Space³⁷.

Green areas within new residential development can be designated as LGS if they are found to be demonstrably special and hold particular local significance³⁸.

Whether to designate land as LGS is a matter for local discretion, however the green area will need to meet the criteria set out in paragraph 102 of the NPPF³⁹.

Proximity of the LGS to the community it serves will depend on local circumstances (including why the green areas is seen as special), but it must be reasonably close⁴⁰.

There are no rules regarding the minimum size of a LGS, however they should not be an extensive tract of land⁴¹.

Some LGS may have public access but designation does not confer any rights of public access. Land may be considered for designation even if there is no public access, for instance where green areas are valued for wildlife, historic significance and / or beauty⁴².

Areas with public rights of way may be designated LGS. However, there is no need to designate linear corridors as LGS to protect rights of way, as these are already protected under other legislation⁴³.

³² Paragraph: 005 Reference ID: 37-005-20140306

³³ Paragraph: 006 Reference ID: 37-006-20140306

³⁴ Paragraph: 007 Reference ID: 37-007-20140306

³⁵ Paragraph: 008 Reference ID: 37-008-20140306

³⁶ Paragraph: 009 Reference ID: 37-009-20140306

³⁷ Paragraph: 010 Reference ID: 37-010-20140306; Paragraph: 011 Reference ID: 37-011-20140306

³⁸ Paragraph: 012 Reference ID: 37-012-20140306

³⁹ Paragraph: 013 Reference ID: 37-013-20140306

⁴⁰ Paragraph: 014 Reference ID: 37-014-20140306

⁴¹ Paragraph: 015 Reference ID: 37-015-20140306; Paragraph: 016 Reference ID: 37-016-20140306

⁴² Paragraph: 017 Reference ID: 37-017-20140306

⁴³ Paragraph: 018 Reference ID: 37-018-20140306

A LGS does not need to be in public ownership, however, the landowner should be contacted at an early stage about proposals to designate any part of their land as Local Green Space⁴⁴. Designation gives the land protection consistent with Green Belt, but otherwise conveys no other restrictions or obligations on the landowner⁴⁵ and the management of the LGS remains the responsibility of the landowner⁴⁶. Land designated as Local Green Space may also be potentially nominated by the local authority as an Asset of Community Value,⁴⁷ enabling community interest groups to bid if the owner wants to dispose of the land.

B3.4 Legal precedents

B3.4.1 Planning Appeals

Recent case law reinforces the need for a clear, transparent methodology for assessment where justification is based on evidential analysis and not just assertive opinion. Proposed amendments to LGS boundaries must be made available on the Proposals Map.

The Lochailort judgement (2020)⁴⁸ noted that the ‘bar for LGS designation is set at a very high level’, and these types of designations will typically not be appropriate for most areas of open space. The criterion of being demonstrably special to the community is not the same as being important to local communities. LGS sites must not be commonplace spaces, and instead must be of a limited and special nature.

LGS is consistent with policies for Green Belt and therefore, ‘openness should be maintained’⁴⁹. An extensive tract of land is considered to be an area of 300ha or more⁵⁰. There needs to be sufficient justification for the level of Local Green Space and assurance that this should be consistent with the local planning of sustainable development⁵⁷.

B3.4.2 Independent Examinations

With regard to recent Inspectors’ decisions within the Borough, there is one designated LGS in the borough, the Udney Park Playing Fields in Teddington (UPPF) which was subject to scrutiny by two planning inspectors under the 2012 NPPF. After the first Inspector’s decision was overruled, the High Court ordered a new consultation on proposed modifications to the Plan to make clear the status of Udney Park Playing Fields and for the matter to be reconsidered by the Planning Inspectorate. The second Inspector stated that ‘it is abundantly clear that UPPF meet the criteria for LGS designation’, citing UPPF’s local significance both

⁴⁴ Paragraph: 019 Reference ID: 37-019-20140306

⁴⁵ Paragraph: 020 Reference ID: 37-020-20140306

⁴⁶ Paragraph: 021 Reference ID: 37-021-20140306

⁴⁷ Paragraph: 022 Reference ID: 37-022-20140306

⁴⁸ *Lochailort v Mendip District Council & Norton St Philip Parish Council (2020) EWHC 1146 (Admin)*

⁴⁹ Planning Inspectorate (2019) *Appeal Ref: APP/X5210/W/18/3198746 – LifeCare Residences*

⁵⁰ Planning Inspectorate (2019) *Appeal Ref: APP/Z4310/W/16/3166010 – Redrow Homes NW and Allerton Priory LLP*

historically and ecologically. On 3 March 2020 the Council adopted the matter in respect of this legal challenge, incorporating the Local Green Space designation at UPPF in the Local Plan.

Key issues raised in other recent Inspectors' decisions⁵¹ pertained to the amount of land designated for Local Green Space, the definition of 'Extensive Tracts of Land', the level of community engagement and consultation with landowners, the evidence for 'demonstrably special and alternative and overlapping designations.

In the case of Croydon, the Inspector's Report⁵² detailed that there was no information

'to explain why each of those designations is of particular importance to their local communities. Nor is a sample of 7 Neighbourhood Plans out of a total of 340 made by 7 June 2017 necessarily a typical sample. There is no national guidance as to the expected rate of LGS designation in relation to population but NPPF paragraph 77 advises that the Local Green Space designation will not be appropriate for "most" green areas or open space. Yet, of the 170 sites assessed in Appendix 1 of the Council's Technical Paper – Green Grid (evidence document LBC-07-800), 87 (i.e. "most") are assessed for designation. This, together with the anecdotal points already noted, suggests that the Council's process for assessment has not been sufficiently rigorous to be sound...I have serious concerns that the Council's assessment of the proposed LGS designations has not been carried out with sufficient rigour nor focussed fully on the stringent criteria set out in the Framework which set a high bar given that LGS sites enjoy the same level of protection as Green Belt land.'

⁵¹ Plymouth And South West Devon Joint Local Plan (found sound, planned for adoption March 2019). Final Inspector's Report:
<https://www.plymouth.gov.uk/sites/default/files/PSWDJLPFinalReport.pdf>

South Cambridgeshire Local Plan (adopted in 2018) Inspector's Interim Findings:
https://www.scambs.gov.uk/media/3211/letter_from_inspectors_re_interim_findings_policy_nh12_lgs_rd-gen-420.pdf; Final Inspector's Report: <https://www.cambridge.gov.uk/media/5931/report-on-the-examination-of-the-south-cambridgeshire-local-plan.pdf>

Kirklees Council (adopted May 2019) Final Inspector's Report:
<https://www.kirklees.gov.uk/beta/planning-policy/pdf/local-plan-inspectors-report/Kirklees-Local-Plan-Inspectors-Report.pdf>

Reading Borough Local Plan (adopted November 2019) Final Inspector's Report:
https://www.reading.gov.uk/media/10392/Final-Inspectors-Report-24092019/pdf/Final_Inspectors_Report_24092019.pdf

Craven Local Plan (adopted November 2019) Final Inspector's Report:
<https://www.cravencdc.gov.uk/media/8684/craven-local-plan-inspectors-report-with-appendix-1-vfinal.pdf>

Mendip District Local Plan 2006-2029 (At Examination, September 2019) The Inspector's Interim Note – Post Hearing Advice (September 2019)⁵¹:
https://www.mendip.gov.uk/media/22966/ED20-Inspector-s-Interim-Note-on-Post-Hearing-Advice-10-Sep-2019/pdf/ED20_-_Mendip_Local_Plan_Part_2_Examination_-_Inspector's_Interim_Note_on_Post_Hearing_Advice_-_10_S.pdf?m=637037287236430000

⁵² Paul Clark, Inspector, (2018) Report on the Croydon London Borough Council

B3.5 Experience Elsewhere

A brief examination of Local Green Space Assessments carried out in close / neighbouring boroughs (Table B3.1), as well as a draft methodology paper, was undertaken and revealed the following key lessons in terms of approach:

- Potential sites for Local Green Space were identified as part of Local Plan public consultations, and through community workshops.
- An initial sieving exercise was generally undertaken at the start of the process which included considerations such as site size, whether the site had planning permission, and whether it was constrained by statutory designations.
- The NPPF's criteria for designating Local Green Spaces were subject to interpretation by Local Planning Authorities to ensure applicability to local circumstances. Furthermore, Councils produced additional points to consider in order to help assess sites against these criteria, including what submitted sites would be assessed against and how they would be scored.
- In the case of Spelthorne (Draft), Elmbridge and Runnymede, the scoring system applied was identical, as follows:

Sub-criteria were scored between nil/one (nil, i.e. the site did not meet any of the criteria in any way or one, i.e. the site met the criteria in a minimal way) and five points, where the site met a number of criteria, or an individual criterion strongly. In designating a site as LGS, it was proposed that if a site achieved over 50% of the total available scoring, e.g. a score of at least 13 out of 25, then it would be recommended for designation. This was because it would need to score well against at least three sub criteria. Alternatively, if a site scored a maximum of five against two sub-criteria, but did not score at least 13 overall, it would also be recommended for designation due to the site scoring so highly against those sub-criteria. If a site scored below 13 and did not score five against two sub-criteria then it would not be recommended for designation, as the site was not considered to be meeting the requirements of the sub-criteria sufficiently to warrant designation.

Table 3.1 Experience Elsewhere –LGS

Local Authority	Study	Status	Summary of Approach
London Borough of Croydon	Strategic Policies (Partial Review) and Detailed Policies and Proposals evidence base	Published 2016	<p>The evidence base set out that Replacement Unitary Development Plan (2006) identified sites of Local Open Land and in preparation for the Detailed Policies (Preferred and Alternative Options) a full assessment of the Local Open Land was undertaken to assess whether these sites met the criteria for Local Green Space. The criteria were developed against the requirements of the NPPF requiring Local Green Spaces to be in close proximity to the community it serves, to be demonstrably special or holds particular local significance and is local in character.</p> <p>In order to be designated as Local Green Space, the Local Open Land needed to be:</p> <ul style="list-style-type: none"> - In close proximity to the community it serves; - In local character and not part of an extensive tract of land; and - Be at least three of the following, or publicly accessible and one of the following, to be demonstrably special or hold particular local significance.: <ul style="list-style-type: none"> o (a) Historic Park or Garden; o (b) Community Garden; o (c) Children’s play area; o (d) Tranquil area; o (e) Natural and semi-natural open space; o (f) Cemetery, church yard or burial ground; o (g) Site of Nature Conservation Importance; or o (h) Playing field or recreation ground. <p>Consultation from Nov – Dec 2015 identified 79 sites for designation including re-designation of Sanderstead Plantation as Local Green Space from MOL. Following consultation an additional nine sites were suggested and three sites met the criteria and an existing site was extended.</p> <p>Two studies underpinned the analysis: Review of potential Local Green Space (2013) and Green Belt and Metropolitan Open Land Review (2016). The former was not publicly available, so could not be reviewed as part of this study for LBRuT. The Green Belt and Metropolitan Open Land Review identified some areas for re-designation as local green space.</p> <p>[NB this methodology was criticised at the Independent Examination – see section B3.4.2]</p>
Elmbridge Borough Council	Local Green Space Designation Study	Published 2016	<p>The study sets out the methodology for, and the assessment of, land submitted to the Council for designation as Local Green Space. The methodology was prepared by the Council in accordance with the NPPF, the Government’s Planning Practice Guidance, examples of other local authorities’ assessments and previous work undertaken by the Council on its approach to assessing ‘designations’.</p>

Local Authority	Study	Status	Summary of Approach
			<p>A sieving exercise was undertaken to exclude land which was located within an area covered by a statutory designation, has planning permission, is inaccessible and / or does not meet the land size / characteristics requirements.</p> <p>All remaining sites were considered against the established criteria and the interpretation of this at a local level. The scoring system used when assessing each suggested area was based upon defined criteria. Each of these was broken down into sub-criteria which were scored between 0 (null, e.g. the area did not meet any of the criteria in any way) and 5 points, where the area met a number of, or the individual criteria strongly. In designating an area as Local Green Space it was proposed that if an area achieved over 50% of the total available 'points' e.g. a total score of at least 13 out of the 25 available, then it would be considered for designation. This was because it would need to score highly against at least three criteria. Alternatively, if an area scored maximum points (5) against two criteria, but does not score at least 13 points overall, it would also be considered for designation due it scoring so highly against those criteria. If an area scored below 13 point and did not score 5 against two criteria then it will not be considered for designation as the area was not considered to be meeting the requirements of the criteria sufficiently to warrant designation.</p> <p>116 areas suggested by the community for designation were assessed against the methodology. Following on from detailed assessments, the initial findings were that there were 38 areas which met LGS criteria.</p>
Runnymede Borough Council	Runnymede 2030 Local Green Space Assessment	Published 2017	<p>This document sets out the Council's approach to identifying, assessing and making recommendations on sites that could be designated as Local Green Spaces within the Borough of Runnymede and was prepared to accord with the NPPF.</p> <p>An initial sieving process took place where sites that already held one of a listed number of statutory designations were taken out of consideration for LGS designation, as were sites which already had planning permission or which were considered to be an extensive tract of land. This initial sieving process took place in line with national policy, the relevant extracts of which are highlighted in the document. The remaining sites were then assessed against the Council's criteria.</p> <p>The scoring system used when assessing each submitted site was based upon the five main criteria set out in the PPG. Each of the five criteria was broken down in sub-criteria which were scored between nil/one (nil, i.e. the site did not meet any of the criteria in any way or one, i.e. the site met the criteria in a minimal way) and five points, where the site met a number of criteria, or an individual criterion strongly. In designating a site as LGS, it was proposed that if a site achieved over 50% of the total available scoring, e.g. a score of at least 13 out of 25, then it would be recommended for designation. This is because it would need to score well against at least three sub criteria. Alternatively, if a site scored a maximum of five against two sub-criteria, but did not score at least 13 overall, it would also be recommended for designation due to the site scoring so highly against those sub-criteria. If a site scored below 13 and did not score five against two sub-criteria then it will not be recommended for designation, as the site is not considered to be meeting the requirements of the sub-criteria sufficiently to warrant designation.</p> <p>Of the 70 sites submitted through the public consultation, it was recommended that five sites were designated as LGS.</p>

Local Authority	Study	Status	Summary of Approach
Spelthorne Borough Council	Spelthorne Local Green Space Assessment Methodology – Draft Report	Consultation – Published 2019	<p>The Council have produced its own methodology to accord with the NPPF and guidance as set out within PPG. In addition, Spelthorne have also utilised assessments carried out by other authorities, particularly neighbouring Runnymede and Elmbridge, to inform the assessment and decision-making processes.</p> <p>An initial ‘sieving’ exercise was proposed at the start of the area analysis process including consideration of site size and whether the site has planning permission. It was proposed that all sites should then be considered against the established NPPF criteria and the interpretation of this at a local level.</p> <p>In designating an area as Local Green Space it was proposed that if an area achieves over 50% of the total available ‘points’ e.g. a total score of at least 13 out of the 25 available, then it would be considered for designation. This was because it would need to score highly against at least three criteria. Alternatively, if an area scored maximum points (5) against two criteria, but did not score at least 13 points overall, it would also be considered for designation due it scoring so highly against those criteria. If an area scored below 13 points and did not score 5 against two criteria then it would not be considered for designation as the area is not considered to be meeting the requirements of the criteria sufficiently to warrant designation.</p>

Note: Published LGS reviews were not identified for the other neighbouring authorities of Hounslow, Hammersmith and Fulham, Wandsworth, Merton and Kingston upon Thames

B4 OOLTI

Other Open Land of Townscape Importance (OOLTI) is a local designation, therefore there is no national or regional policy, guidance, or experience elsewhere to draw upon.

B4.1 Local Plan

Policy LP 14 of the adopted Local Plan pertains to ‘Other Open Land of Townscape Importance’ (OOLTI). The policy safeguards OOLTI and ensures it is not lost to other uses without good cause. OOLTI forms an important part of the Green Infrastructure network and can be public or private spaces.

OOLTI should be predominately open or natural in character. The following criteria are taken into account when defining OOLTI:

- Contribution to the local character and/or street scene, by virtue of its size, position and quality.
- Value to local people for its presence and openness
- Immediate or longer views into and out of the site, including from surrounding properties.
- Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 ‘Green Infrastructure’.
- Value for biodiversity and nature and meets one of the above criteria.

It is also noted that not all of the criteria above need to be met.

The policy also states that such areas will be protected in open use and enhanced where possible. It is recognised that there may be exceptional cases where appropriate development is acceptable. The following criteria should be taken into account when assessing whether development is appropriate:

- It must be linked to the functional use of Other Open Land of Townscape Importance; or
- It can only be a replacement of, minor extension to, existing built facilities; and
- It does not harm the character or openness of the open land.

Improvements and enhancements to the openness and character of the OOLTI in addition to measures to reduce visual impacts will be encouraged. Development on sites outside the OOLTI will be considered with regard to their impacts on the character and openness of the OOLTI.

Policy LP 32 also outlines the value of using Green Belt, MOL and OOLTI allotments which address social wellbeing as well as contributing to biodiversity.

B4.2 Legal precedents

The OOLTI designation unique to the LBRuT, therefore there are no legal precedents (case law or Independent Examinations) pertaining to OOLTI from outside of the Borough. No case law was identified for OOLTI sites within the borough.

The issues of OOLTI was discussed in a previous examination during plan making (see below), which led to the introduction of the criteria within the Development Management Plan (now superseded by the Local Plan).

B4.3 Experience Elsewhere

As a local designation, there is no experience elsewhere per se to reference. However, there has been one previous study of OOLTI.

As explained in the brief, the OOLTI policy first appeared in the 1985 Local Plan. In 2006 Allen Pyke & Associates carried out a review of open land designations in the borough to assess whether they were appropriately designated, covering MOL, Green Belt, OOLTI and green chains. They then reviewed further other open areas. The consultants suggested a large number of areas were designated as OOLTI, the majority of which, along with others suggested by local amenity groups, were added into the Development Management Plan, adopted in 2011.

The criteria set out in Policy LP 14 were formulated in the Development Management Plan, in response to the Examiner seeking clarification on the criteria taken into account for in defining OOLTI. The review process in 2006 was to identify and recommend new sites for designation under the old policies and further increase the areas of protected open land, recreational spaces, visual amenity and the character of the borough and not to identify sites for potential de-designation.

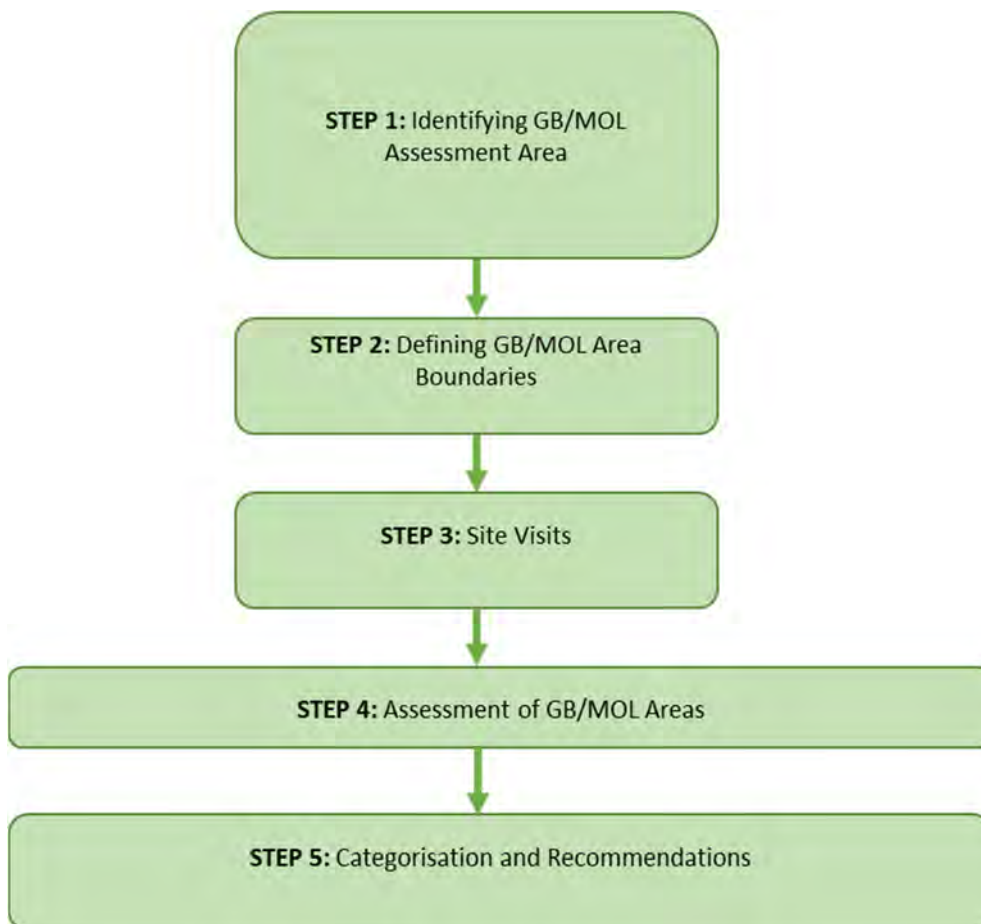
Appendix C

Method

C1 Green Belt and MOL Methodology

The following section sets out the methodology used for undertaking the Green Belt and MOL assessments. The methodologies followed a similar stepped approach, as summarised in Figure C1.1. The starting point for each study was to establish the full extent of existing Green Belt and MOL (Step 1). The gross areas of Green Belt and MOL were then be subdivided into assessment areas, the boundaries of which were defined in line with the NPPF (2021, Para 143) Green Belt boundary definition, (Step 2). The separate Green Belt and MOL assessment processes (Step 4) drew on both primary evidence from site visits (Step 3) and desktop research. Step 5 included recommendations for each Green Belt and MOL General Area. With regards to MOL, this included consideration of enhancements and boundary alterations / mitigation.

Figure C1.1 Green Belt and MOL Assessment Process



C1.1 Step 1: Area Identification

The scope for this review was to consider all of the borough's Green Belt (see Map C1.1) and MOL (see Map C1.2), as defined in the adopted Local Plan (2018). It should be noted that the scope of the Study does not include consideration of non-Green Belt/ MOL land for inclusion in the Green Belt or MOL.

C1.2 Step 2: Defining Area Boundaries

C1.2.1 Green Belt

As required by the brief, two tiers of Green Belt land parcel were identified for assessment:

- Strategic Green Belt Areas (Strategic Areas) – Broad areas for the Strategic Assessment, identified largely through commonalities in landscape character and natural constraints or barriers that distinguish between different parts of the Green Belt, and functional connections with the wider Metropolitan Green Belt. Further details on the identification of the Strategic Areas is provided in section C1.2.1.1. This considered the role of the borough's Green Belt in relation to the wider context (i.e. in relation to the neighbouring authorities of Hounslow, Elmbridge and Spelthorne)
- General Green Belt Areas (General Areas) – More granular parcels for assessment against the NPPF purposes to identify the relative performance of these areas. Further details on the identification of the General Areas is provided in sections C1.2.1.2.

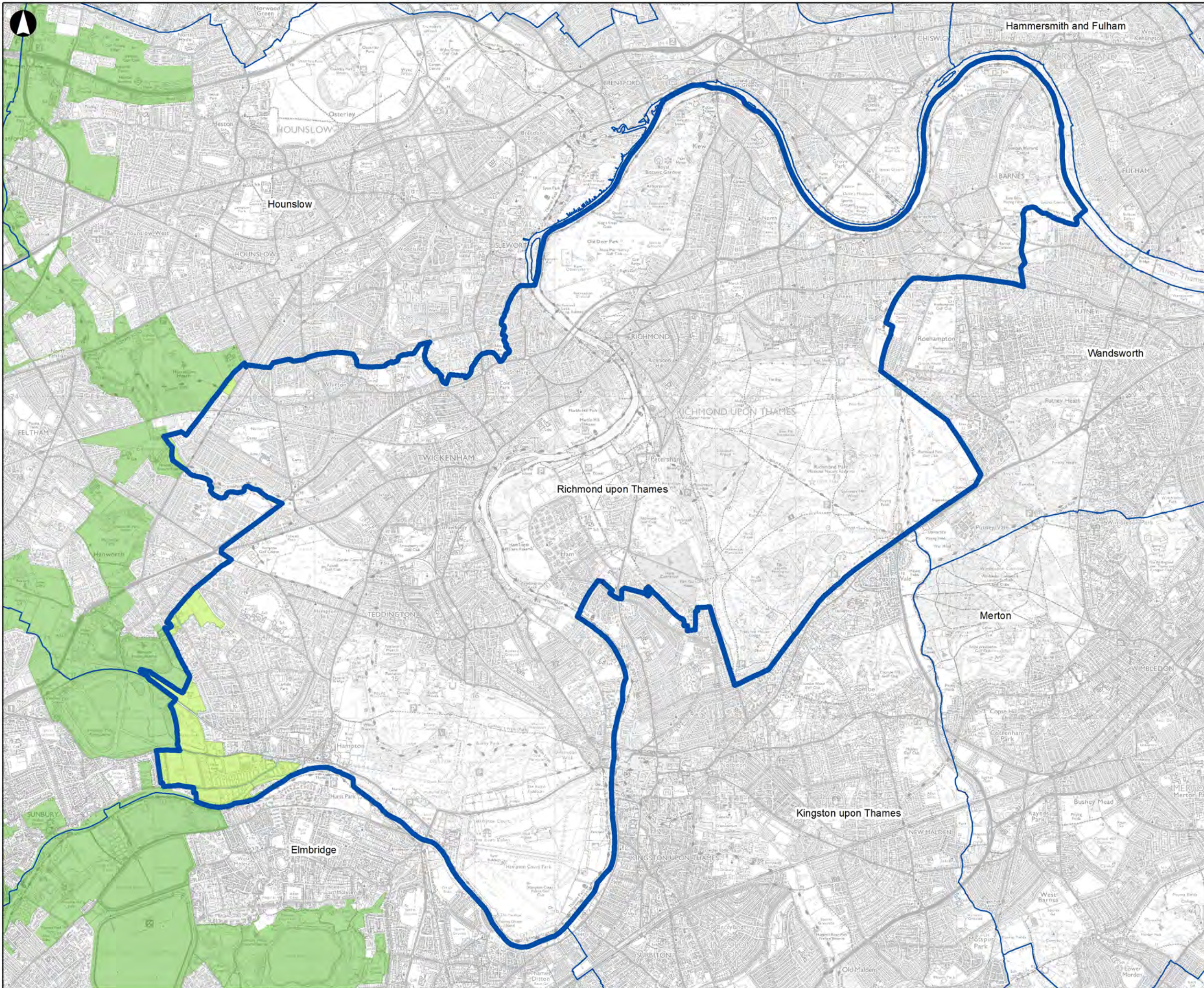
C1.2.1.1 Strategic Areas

Green Belt designation extends over only 2.29% of the borough and is located to the southern and western tips of the borough.

A Strategic Area has been identified based on desk-based research on the function of different Green Belt areas and the existing settlement morphology; and a review of approaches in neighbouring local authority areas.

One potential Strategic Area – known as 'Strategic Area A' – has been identified for consideration, which is consistent with one of the areas adopted by the adjoining Spelthorne Borough Council and Elmbridge Borough Council for their Green Belt Assessments (see Map C1.3):

Strategic Area A – comprises a north-eastern band of Green Belt at the very edge of London which separates the London fringe settlements (e.g. Bedfont, Feltham, Sunbury-on-Thames, and Hampton) from settlements to the south-west. This Strategic Area is limited in width and more fragmented within London. Incorporating the northern reaches of the Thames River and Lower Mole River Floodplains, the Strategic Area is degraded in places and includes a series of large elevated reservoirs and other industrial uses such as treatment works at Hampton, Walton and Esher, and the Sunbury Lock gas works.

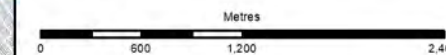


Legend

- LBRuT Green Belt
- Neighbouring Green Belt
- LBRuT Borough Boundary
- Neighbouring Borough Boundary

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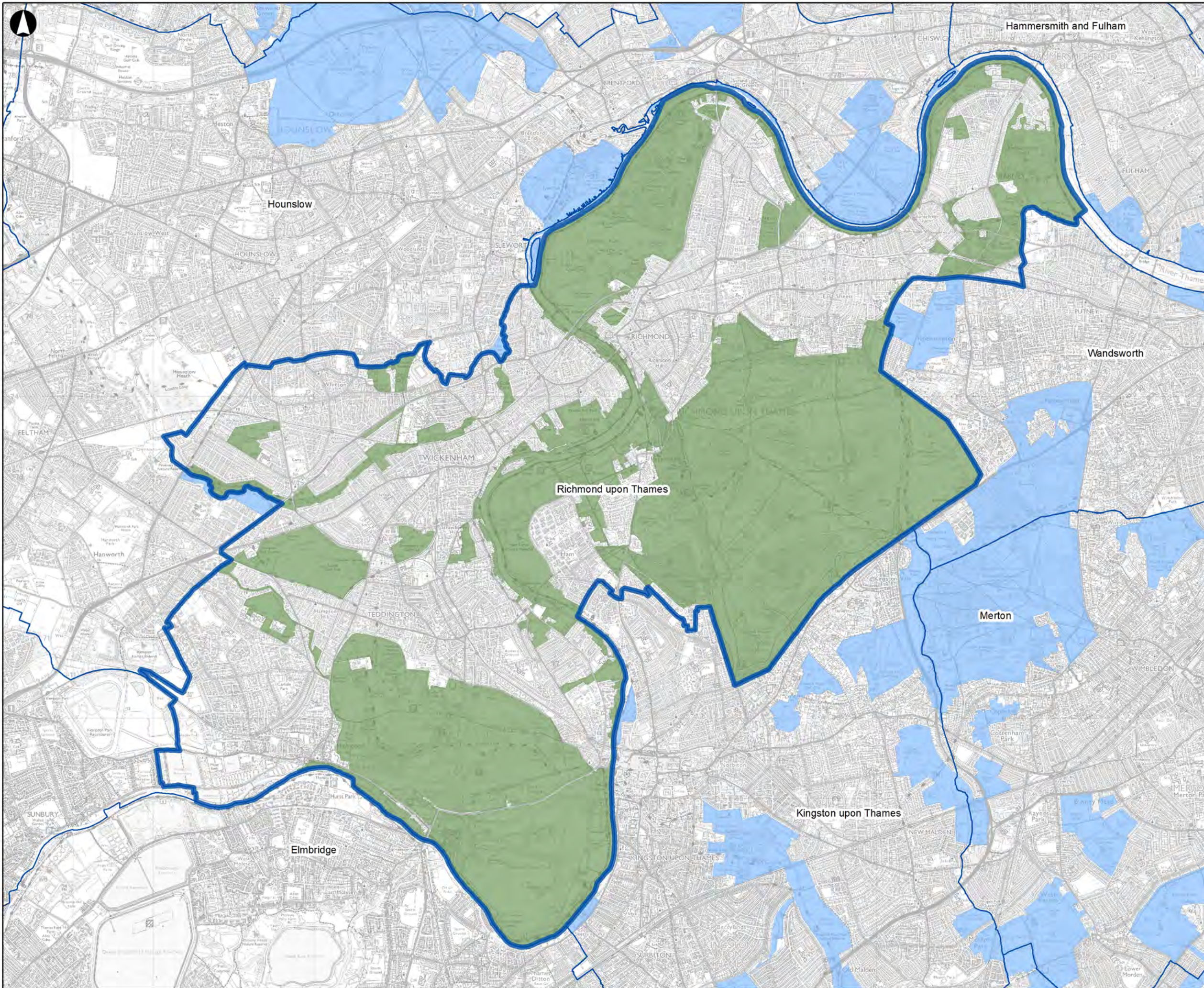
Client
London Borough of Richmond upon Thames

Job Title
Green Belt Review

LBRuT and Neighbouring Authorities' Green Belt

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Drawing No C1.1	Issue P1

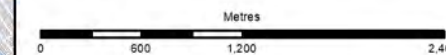


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- Neighbouring MOL
- LBRuT Borough Boundary
- Neighbouring Borough Boundary

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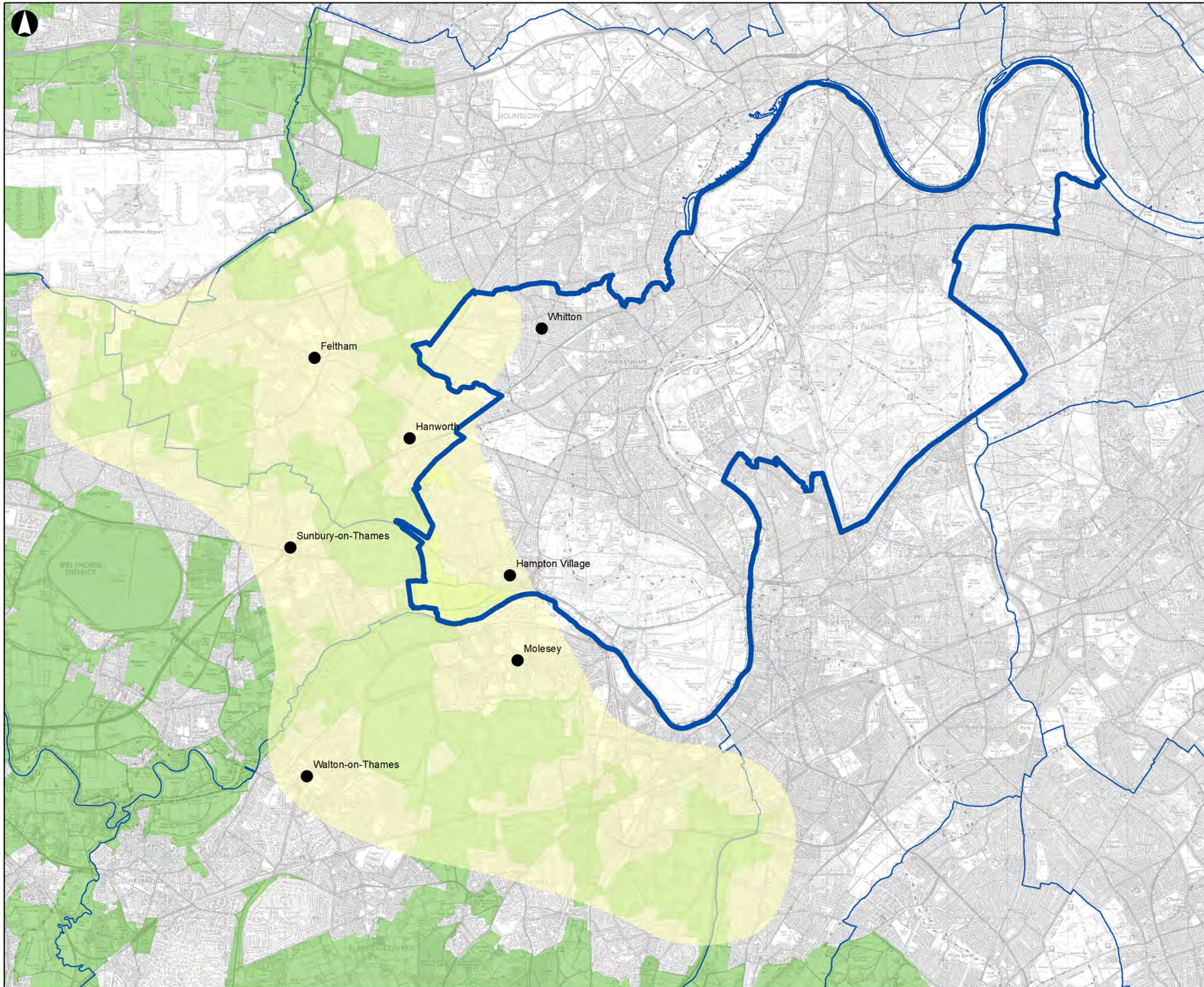
Client
London Borough of Richmond upon Thames

Job Title
MOL Review

LBRuT and Neighbouring Authorities' MOL

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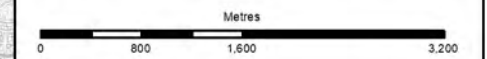


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- Strategic Area 'A'
- LBRuT Green Belt
- Neighbouring Green Belt
- LBRuT Borough Boundary
- Neighbouring Borough Boundary

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Job Title
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Job No 280272-00	Drawing Status Issue
Drawing No C1.3	Issue P1

C1.2.1.2 General Areas

Given the requirement through paragraph 143 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 General Areas should be defined to reflect these principles from the outset.

Permanent features, both man-made and natural, were selected as the basis of criteria for the identification of the General Areas. In particular, the boundaries of the General Areas were based on the following features (Map C1.4):

- Motorways
- A and B Roads
- Railway lines
- Rivers Thames.

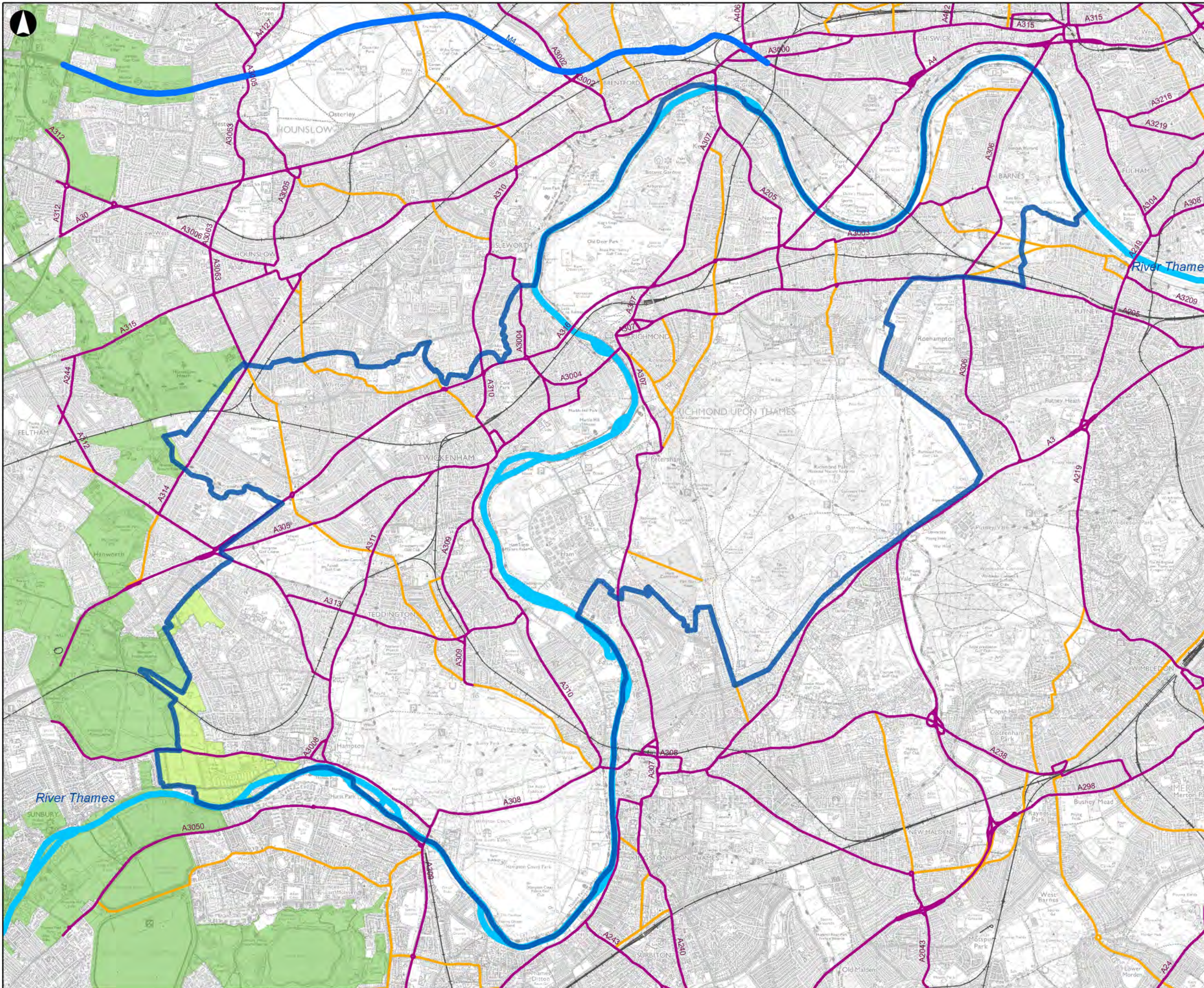
If these features were not present, alternative boundary features have not been used to subdivide larger areas. A more detailed Stage 2 study (outside the scope of this current review) would go on to subdivide larger parcels using other features such as unclassified roads, smaller water features, tree lines and edges of development to better understand the performance of smaller ‘sub-areas’.

Whilst this level of subdivision does not occur for Stage 1 parcel definition, the assessment acknowledged the different characters within each General Area (for both Green Belt and MOL) and considered whether parts of the General Area performed weakly against each NPPF purpose in the case of Green Belt or London Plan criterion in the case of MOL, and should therefore be considered for further assessment as part of a Stage 2 study. This approach ensured that a weakly performing part of a General Area did not result in the whole General Area performing weakly/ recommended for potential release.








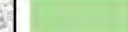
General Area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps ‘birds eye’ views and Google Earth. Boundaries were adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the parcel and involved an element of professional judgement. Each General Area was assigned a unique reference number, (Map C1.5).

In some cases, where boundary features are located close together, for example where roads, rivers, and/or railway lines which run parallel to each other, these features were taken together to form one boundary rather than separately which would lead to small slithers of Green Belt land which would not form logical General Areas for assessment.

In cases where a wide boundary feature (e.g. rivers) forms the General Area boundary, the boundary of the General Area will be taken to be the centre line of these boundary features. The centre line of natural features often aligns with the Borough boundary (e.g. the River Thames which often acts as the boundary between LBRuT and neighbouring boroughs).

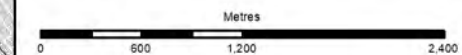


Legend

-  Motorway
-  A Road
-  B Road
-  Railway line
-  River Thames
-  LBRuT Green Belt
-  Neighbouring Green Belt
-  LBRuT Borough Boundary

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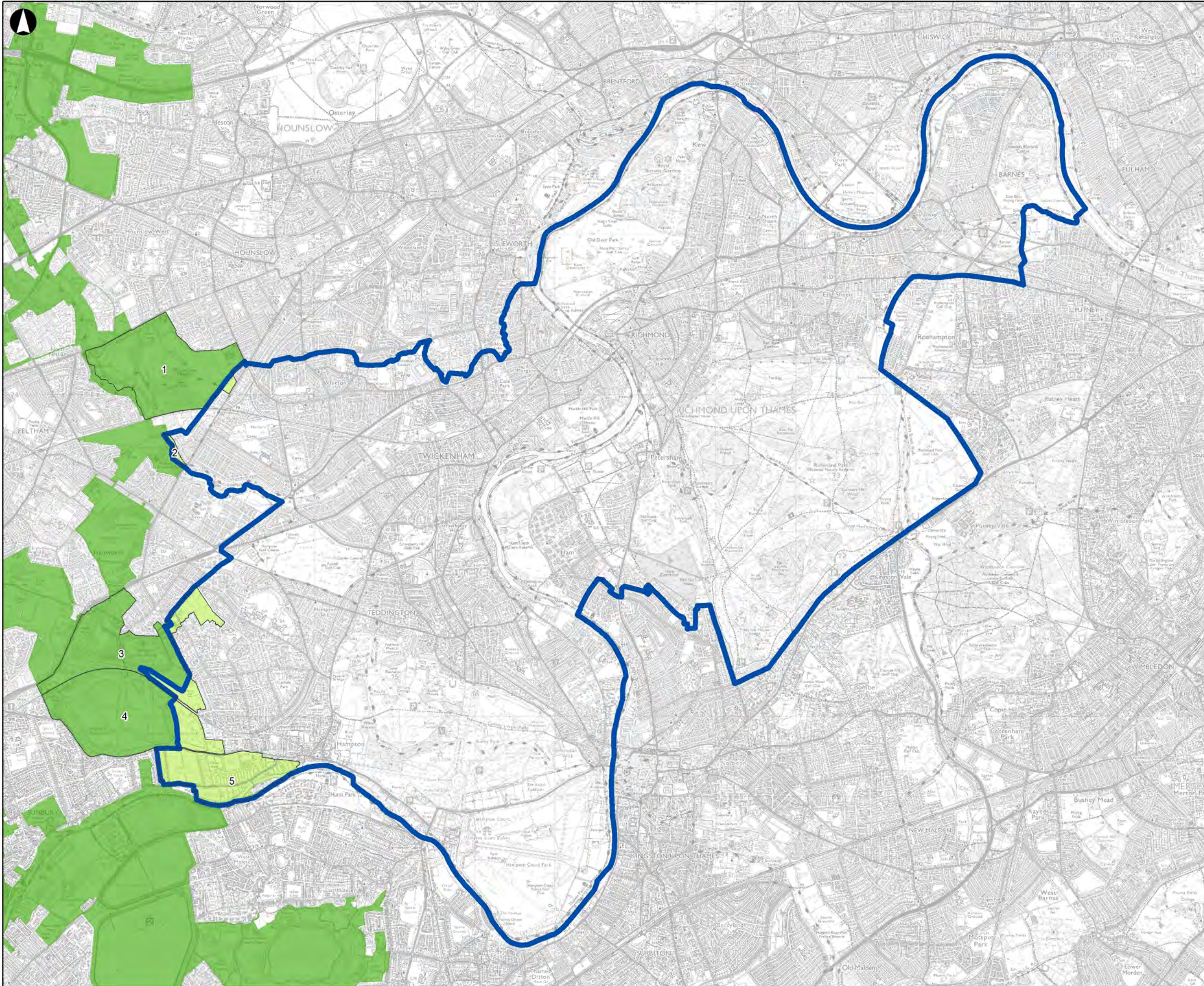
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London Borough of Richmond upon Thames

Job Title
Green Belt Review



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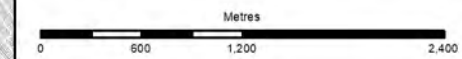


Legend

- General
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Client
London Borough of Richmond upon Thames

Job Title
Green Belt Review



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Drawing No C1.5	Issue P1
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In cases where the LBRuT boundaries do not coincide with permanent and durable boundary features, General Areas overlap with Green Belt in neighbouring authority areas to align with the nearest durable feature. In drawing up General Area boundaries, assessment areas identified in Stage 1 assessments in neighbouring boroughs of Spelthorne, Hounslow and Elmbridge will be considered. This approach will ensure a consistent approach to the assessment of Green Belt throughout the borough and will take into account the strategic, cross-boundary nature of the Metropolitan Green Belt. However, it is important to note that this assessment does not directly influence the approaches to Green Belt in neighbouring authorities and no recommendations are ultimately be made beyond the boundaries of LBRuT.

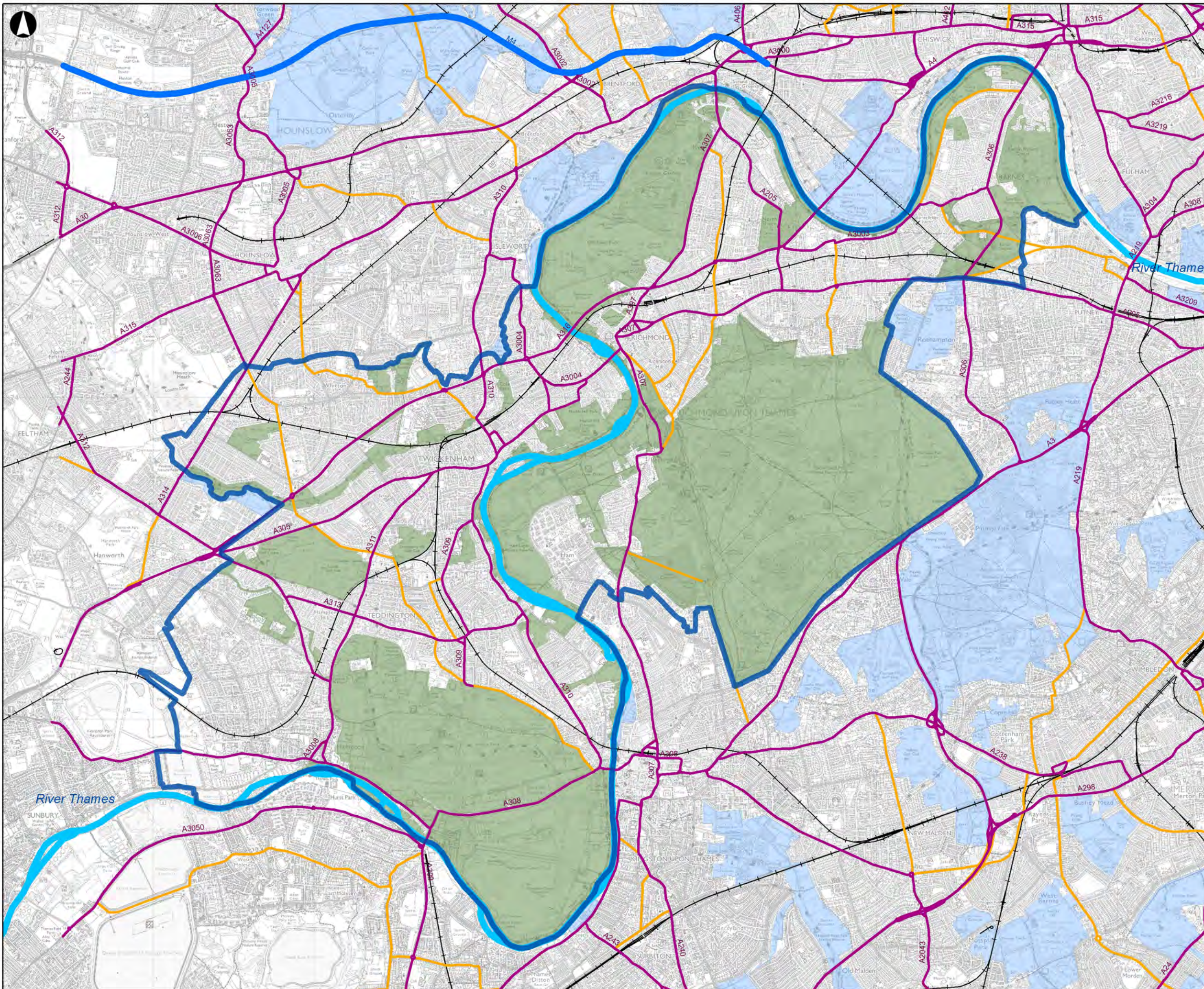
C1.2.2 MOL

Given that the London Plan policy suggests NPPF Green belt policy principles should be applied to MOL, it therefore follows that a similar approach can be adopted for defining MOL boundaries. In dividing the MOL into parcels (General Areas) for assessment against London Plan criteria to identify their relative performance, the same permanent man-made and natural features were used (Map C1.6).

Similar to Green Belt General Area identification, MOL General Area boundaries were initially defined through desk-based assessments of publicly available data. Each area was assigned a unique reference number, (Map C1.7). Boundaries were adjusted as necessary, based on desktop analysis and 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 General Area and involved an element of professional judgement.

C1.3 Step 3: Site Visits

When possible, all Green Belt and MOL General Areas were visited to understand their immediate context, character and boundary features, and to refine the initial analysis. Separate pro-formas for the Green Belt and MOL assessments were developed (in ESRI Collector to enable capture of raw data, in the field, in real time) to capture and verify information and recommendations during site visits and as the primary evidence base for reporting. Geo-referenced photographs of all General Areas were taken (access permitting) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider Green Belt/ MOL and adjacent built development as relevant.

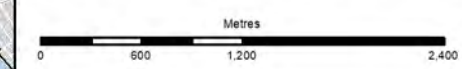


Legend

- Motorway
- A Road
- B Road
- +— Railway Line
- River Thames
- LBRuT MOL
- Neighbouring MOL
- LBRuT Borough Boundary

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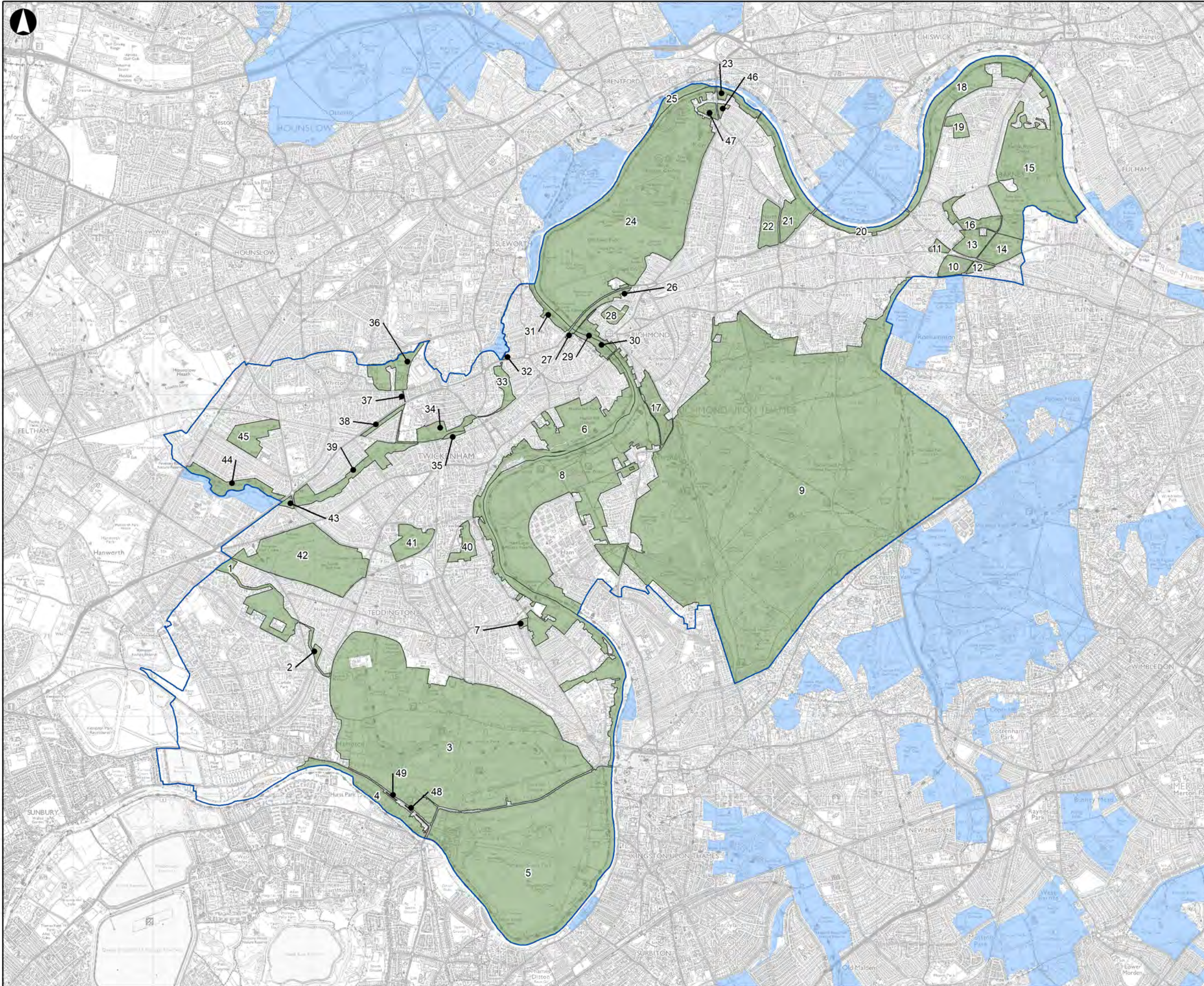
Job Title
MOL Review

**Defining Features for MOL
 General Areas**

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Job No 280272-00	Drawing Status Issue
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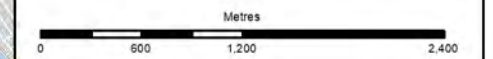


Legend

- MOL General Area
- LBRuT MOL
- Neighbouring MOL
- LBRuT Borough Boundary

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Issue	Date	By	Chkd	Appd

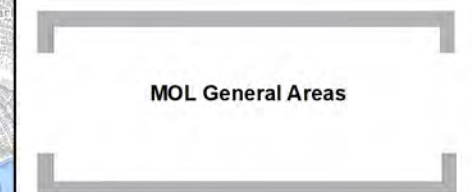


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MOL Review



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Drawing No C1.7	Issue P1

C1.4 Step 4: Green Belt Assessment

The Green Belt performance was assessed against the NPPF purposes. 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.

C1.5 Purposes

Following a review of the NPPF purposes within the LBRuT context, it was determined that the Green Belt should be assessed against purposes 1-3:

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

NPPF purposes 4 and 5 were excluded from the assessment for the following reasons:

- To preserve the setting and special character of historic towns, was excluded as none of the settlements within the borough within close proximity to the Green Belt meet the definition of a historic town. Nor were there historical features or conservation areas, in the vicinity of the Green Belt if a wider interpretation of historic places is adopted. In terms of neighbouring boroughs, the exclusion of purpose 4 was consistent with the approach taken in Green Belt Reviews undertaken in Hounslow and Elmbridge⁵³.
- 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 General 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.

C1.5.1 Strategic Assessment

The Strategic Green Belt Assessment focussed on two aspects:

- The performance of the Strategic Area in relation to the wider sub-regional context of the Metropolitan Green Belt.
- The contribution of the borough's Green Belt within the Strategic Area.

These aspects were assessed at a high level against the NPPF purposes 1-3.

⁵³ A purpose 4 assessment was undertaken in Spelthorne Stage 1 Green Belt Assessment; however this related to the historic town of Staines-upon-Thames which is not located within proximity to the LBRuT Green Belt.

C1.5.2 General Area Assessment

The purpose of the assessment was to establish any differentiation in terms of how the General Areas in the existing Green Belt function and fulfil the purposes of the Green Belt.

Each of the General Areas was assessed against the purposes of Green Belt, as set out in the NPPF. No national guidance exists which establishes exactly how such an assessment should be undertaken. The PAS guidance, recent examples and previous experience reiterates the need to respect local circumstances and the unique characteristics that affect the way that the NPPF purposes of the Green Belt are appraised.

Green Belt has five purposes, as set out in paragraph 138 of the NPPF (2021). However, purposes 4 and 5 were not deemed to be relevant to the assessment of Green Belt within the LBRuT context. The rationale for this is set out below:

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

As outlined in the advice note published by PAS, the assessment of this purpose relates to very few settlements in practice, due largely to the pattern of modern development that often envelopes historic towns today. Following discussions with the Council, it was determined that Purpose 4 was not relevant to the LBRuT Green Belt assessment given that there were considered to be no instances where historic towns/cores directly abutted the Green Belt and where the Green Belt played a functional role in the setting of such historic settlements.

Purpose 4 was therefore not considered as part of this Study.

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

The advice note issued by PAS suggests that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. Therefore, assessment of Green Belt against this purpose will not enable a distinction between General Areas as all Green Belt achieves the purpose to the same extent.

Purpose 5 was therefore not considered as part of this Study.

One or more criteria were developed for each purpose (1 – 3) using both qualitative and quantitative measures, and a score out of five attributed to each criterion (Table C1.1). Each NPPF purpose was considered equally significant, and therefore no weighting or aggregation of scores across the purposes was undertaken.

Table C1.1 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

The following sections examine the definition of the three purposes, within the local context. The criteria and associated scoring applied are set out.

C1.5.3 Purpose 1

To check unrestricted sprawl of large built-up areas

The original strategic purpose of the Green Belt was to check the sprawl of London. However, it is recognised that the wider Green Belt also plays a role in preventing the unrestricted growth of other large settlements.

This assessment therefore considered the role of the General Areas in preventing the sprawl of London, but also in restricting the sprawl of large built-up areas within adjacent neighbouring local authorities.

LBRuT is one of several boroughs at the extreme south-west of Greater London; sharing boundaries with the other London boroughs of Hounslow (to the north and west), Hammersmith and Fulham (to the north east), Wandsworth (to the east) and Kingston-upon-Thames (to the south). To the west are the Boroughs of Spelthorne and Elmbridge within Surrey. This assessment therefore considered the role of the General Areas in preventing the sprawl of the large built up area of London, with a particular focus on those areas between Greater London and Surrey.

Within the borough and in the surrounding London boroughs, the ‘large built up area’ was interpreted as the Greater London continuous built up area. This includes non-Green Belt areas within LBRuT, London Borough Hounslow, Royal Borough of Kingston-upon-Thames, but also areas within Elmbridge borough (Surrey) which have coalesced with Greater London.

Beyond the Greater London large built-up area, areas within close proximity to the borough’s Green Belt were also considered. Two further large built-up areas were identified (Table C1.2, Map C1.8).

Table C1.2 Large Built-Up Areas Considered in the Purpose 1 Assessment

LBRuT	Neighbouring Local Authorities
<p>Greater London large built-up area (LB Richmond upon Thames)⁵⁴</p>	<p>Greater London large built-up area (LB Hounslow⁵⁵, RB Kingston upon-Thames⁵⁶ and Elmbridge⁵⁷)</p> <p>Ashford / Sunbury-on-Thames / Stanwell (Spelthorne)</p> <p>Walton-on-Thames / Weybridge / Hersham (Elmbridge)</p>

Notes: It is noted that the Spelthorne Core Strategy and Policies DPD (2009) identifies a hierarchy of town centres in Chapter 8. Ashford and Sunbury Cross are identified as Tier 2 ‘Local Centres’; however, functionally they form one continuous built-up area together with Stanwell and were therefore considered as a single large built-up area. Within Elmbridge, Walton-on-Thames, Weybridge and Hersham have already coalesced and will therefore be treated as one large built-up area for the purposes of this assessment

Criterion (a) Assessment

A General Area must be at the edge of one or more distinct large built-up area(s) in order to prevent development which would constitute sprawl. Therefore, criteria a considered on a ‘yes / no’ basis, whether the General Area protects open land at the edge of one or more discrete large built-up area(s). Where a General Area plays a wider strategic role in preventing sprawl but is not at the edge of a large built-up area, this is also acknowledged in the pro-forma.

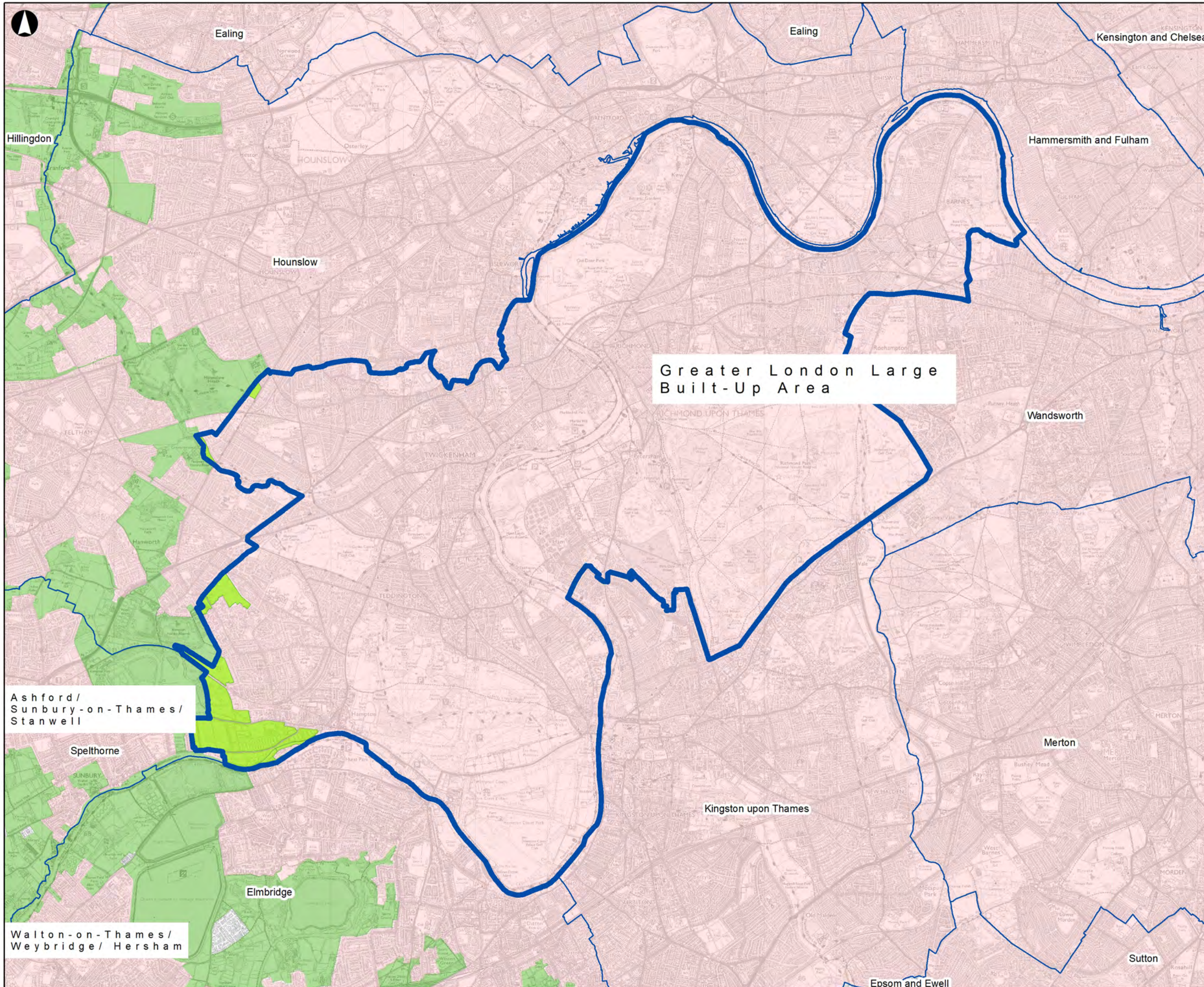
Where a General Area failed against criterion (a), it was not considered against criterion (b).

⁵⁴ For the purposes of the assessment, this includes all constituent parts of the continuous built-up area of Greater London within the LBRuT.

⁵⁵ For the purposes of the assessment, this includes all constituent parts of the continuous built-up area of Greater London within the London Borough of Hounslow, including (but not limited to): Hanworth and Feltham.

⁵⁶ For the purposes of the assessment, this includes all constituent parts of the continuous built-up area of Greater London within the Royal Borough of Kingston upon Thames, including (but not limited to): Surbiton, Tolworth, and Chessington. Additionally, it encompasses the urban areas of Epsom and Ewell which have coalesced with Greater London.

⁵⁷ For the purposes of the assessment, this includes all constituent parts of the continuous built-up area within Elmbridge which have coalesced with Greater London, including (but not limited to) Molesey, Thames Ditton, Long Ditton, and Hinchley Wood.



Legend

- Large Built-Up Area
- LBRuT Green Belt
- Neighbouring Green Belt
- LBRuT Borough Boundary
- Neighbouring Borough Boundary

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Large Built-Up Areas Considered in Purpose 1 Assessment

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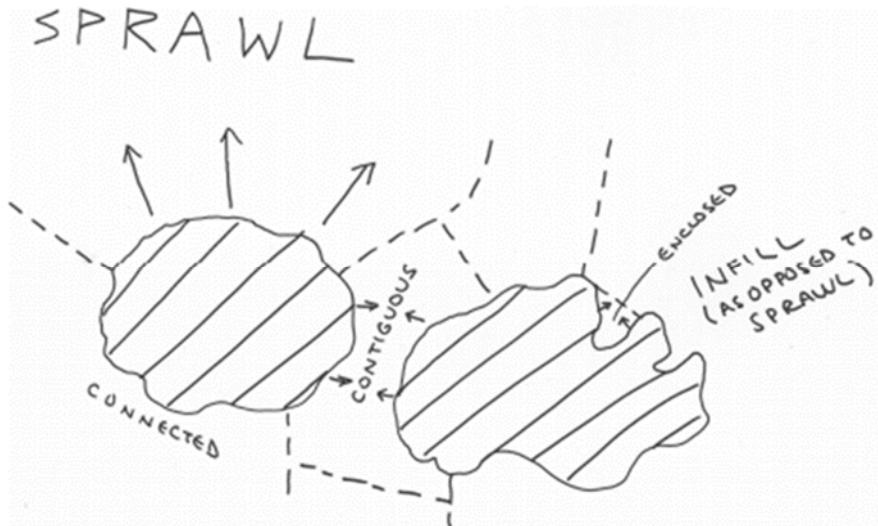
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Drawing No C1.8	Issue P1

Criterion (b) Assessment

Green Belt should function to protect open land at the edge of discrete large built-up areas. However, the extent to which a General Area prevents sprawl is dependent on:

- Its relationship with the respective built-up area(s), in particular the degree / nature of containment by built form. General Areas that are almost entirely surrounded by built development as part of a single built-up area (enclosed) do not prevent sprawl, rather potential development could be classified as infill (Figure C1.2). Whereas General Areas between two built-up areas (contiguous) or on the edge of a built-up area (connected) have a role in preventing sprawl.

Figure C1.2 Illustration of Connected, Contiguous and Enclosed



- Linkages to the wider Green Belt, including the presence of prominent man-made or natural physical features that might restrict the scale of outward growth (both in physical and perceptual terms) and regularise potential development form.
- Extent to which the edge of the built-up area has a defensible, i.e. strongly defined regular or consistent, boundary. Where the built edge is predominantly irregular or comprised of less durable features, the Green Belt plays an important role in preventing sprawl. Where the built-up area edge is predominantly regular or comprised of durable features, the Green Belt is an additional barrier to sprawl. Examples of these features are set out in Table C1.3.

Table C1.3 Examples of Irregular and Regular Boundary Features

Boundary Classification	Boundary Type	Example Features
Regular / durable	Infrastructure	Motorway Public and man-made road Railway line Canal
	Landform	River, stream or other watercourse Prominent physical feature (e.g. reservoir embankment) Woodland edge Tree belt and hedgerows Existing development with strong established and regular boundaries
Irregular / less durable	Infrastructure	Private or un-made road Bridleway or footpath Powerline
	Landform	Field boundary Fragmented or inconsistent tree line or hedgerow

Table C1.4 Purpose 1 Assessment Criteria

Criteria	Score	Description
(a) General Area is at the edge of one or more large built-up areas	YES	At edge of large built-up area(s)
	NO	Not at edge of large built-up area(s)
(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.	5+	General Area is contiguous with two or more large built-up areas which are predominantly bordered by features lacking in durability or permanence.
	5	General Area is contiguous with two or more large built-up areas which are predominantly bordered by prominent and permanent boundary features.
	3+	General Area is connected to one or more large built-up area(s) which is/are predominantly bordered by features lacking in durability or permanence.
	3	General Area is connected to one or more large built-up area(s) which is/are predominantly bordered by prominent and permanent boundary features.
	1+	General Area is enclosed by one large built-up area which is predominantly bordered by features lacking in durability or permanence.
	1	General Area is enclosed by one large built-up area which is predominantly bordered by prominent and permanent boundary features.

C1.5.4 Purpose 2

To prevent neighbouring towns merging into one another.

In addition to the clear function of this purpose in preventing towns from merging and therefore protecting existing gaps between towns, it also forms the basis for maintaining the existing settlement pattern. National policy provides no guidance over what might constitute ‘towns’ and whether this purpose should also take into consideration the gaps between smaller settlements.

Within LBRuT there are several main and local centres (as set out in the centre hierarchy in the LBRuT Local Plan⁵⁸). Due to the spatial distribution of the Green Belt, it does not serve to separate these defined centres within LBRuT. Within this context the assessment of purpose 2 will primarily consider separation between centres which form ‘neighbourhood areas’ within the Greater London built up area (including within LBRuT and LB Hounslow), as well as settlements within non-London authorities, identified from relevant local planning policy (Table C1.5 and Map C1.9).

Table C1.5 Settlements considered in Purpose 2 Assessment

LBRuT	Neighbouring Local Authorities
Hampton Village ⁵⁹ (part of the Greater London built up area)	Molesey ⁶¹ (Elmbridge - part of the Greater London built up area)
Whitton ⁶⁰ (part of the Greater London built up area)	Walton-on-Thames ⁶² (Elmbridge)
	Hanworth ⁶³ (Hounslow- part of the Greater London built up area)
	Feltham ⁶⁴ (Hounslow- part of the Greater London built up area)
	Sunbury-On-Thames ⁶⁵ (Spelthorne)

⁵⁸ Adopted by Council 2 July 2018

⁵⁹ Defined as a Local Centre within the LBRuT Local Plan (2018)

⁶⁰ Defined as a Main Centre within the LBRuT Local Plan (2018)

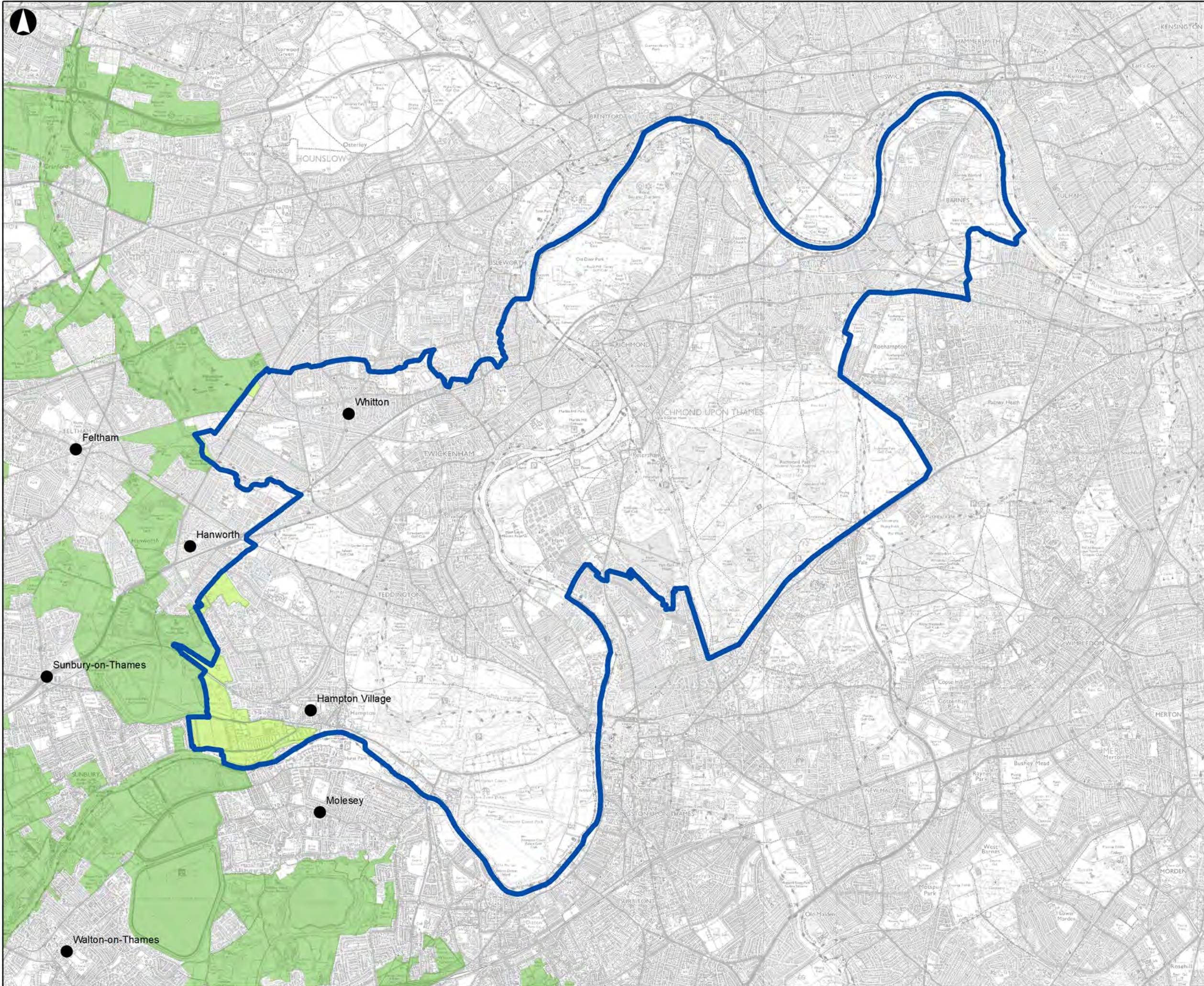
⁶¹ East Molesey is defined as District Centre; and East and West Molesey are together defined as a Suburban Settlement Area within Elmbridge Core Strategy (2011)

⁶² Defined as Town Centre within Elmbridge Core Strategy (2011)

⁶³ Defined as a Large Neighbourhood Centre within London Borough Hounslow Local Plan (2015)

⁶⁴ Defined as a District Centre within London Borough Hounslow Local Plan (2015)

⁶⁵ Sunbury Cross is identified as Tier 2 Local Centre within Spelthorne Core Strategy and Policies DPD (2009)

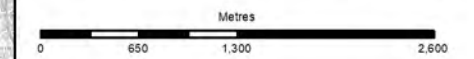


Legend

- LBRuT Green Belt
- Neighbouring Green Belt
- LBRuT Borough Boundary

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Settlements Considered in Purpose 2 Assessment

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Drawing No C1.9	Issue P1

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 C1.6 Purpose 2 Assessment Criteria

Criterion	Score	Description
Restricts development that would result in merging of or significant erosion of the gap between neighbouring built-up areas.	5	General Area forms an essential gap, where development would significantly visually or physically reduce the perceived or actual distance between settlements.
	3	General 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.
	1	General Area forms 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.
	0	General Area does not protect a gap between neighbouring settlements.

C1.5.5 Purpose 3

To assist in safeguarding the countryside from encroachment.

This purpose seeks to safeguard the countryside from encroachment, or a gradual advancement of urbanising influences through physical development or land use change.

The score attributed to a General Area is based on the built form percentage and a qualitative assessment of character from site visits. The percentage of built form within a General 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 openness and the extent to which a General Area can be characterised as ‘countryside’/ ‘rural’ (in line with the NPPF). 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 General 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. General 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.

Table C1.7 Purpose 3 Assessment Criteria

Criterion	Score	Description
Protects the openness of the countryside and is least covered by development.	5	Contains less than 5% built form and possesses a strong unspoilt rural character.
	4	Contains less than 10% built form and/or possesses a strong unspoilt rural character.
	3	Contains less than 20% built form and/or possesses a largely rural character.
	2	Contains less than 30% built form and/or possesses the characteristics of CIAT.
	1	Contains less than 30% built form and possesses an urban character.
	0	Contains more than 30% built form and possesses an urban character.

C1.5.6 Step 5: Green Belt Recommendations

Overall performance against the purpose assessment criteria was determined as follows:

- Any General 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 General 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.
- Any General Area scoring weakly or very weakly (0, 1 or 2) across all NPPF purposes was judged to meet the purpose assessment criteria weakly.

Weaker performing General Areas, as well as any identified smaller scale sub-areas within these, were identified and listed with a view to possible further detailed assessment beyond this Assessment.

C1.6 Step 4: MOL Assessment

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 GIS baseline and well as primary evidence obtained through the site visits. Where land was inaccessible or private, assessment was based on aerial photography and Google Streetview, and where possible views from public highways. The aim of the assessment was to establish any differentiation in terms of how areas function and fulfil the purposes of MOL.

Within the 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 LBRuT Local Plan (2018) Policy LP 13.

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 fundamental part of recent appeal decisions in relation to development proposals within MOL⁶⁶. 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.

⁶⁶ Appeal Ref: APP/H5960/W/16/3163832: Tooting Bec Railway Embankment, Off Cavendish Road, Streatham, London (Inspector's report by Fort, GJ, 24th 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, 2nd August 2016

C1.6.1 Assessment Criteria and Application

The assessment criteria are based on the four criteria (1-4) underpinning MOL set out in the London Plan (Table C1.8). A five-point scale is applied to the relevant criteria, where 1= weak and 5 = strong, with justifications set out. Each MOL criterion is considered equally significant, and therefore no weighting or aggregation of scores across the criteria was undertaken. Land needs to meet one of the criteria 1-3 to be fit for MOL designation (to be assessed against criterion 4, the parcel must already meet at least one of the other criteria). To meet the criteria, a parcel must score a minimum of moderate (3). The highest scoring criteria provides the overall score.

Table C1.8 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 (developed in ESRI Collector to enable capture of raw data, in the field, in real time) to capture and verify information and recommendations during site visits and as the primary evidence base for reporting.

Consideration of Boundaries

The final assessment step considered the relative strength of the MOL boundary in relation to the requirements of paragraph 143 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.

C1.7 Step 5: MOL Categorisation and Recommendations

Following the assessment, each area was categorised. The categorisation identified which areas should be retained within the MOL; and which areas should be considered further. The summary scores and narratives and a set of concise, strategic principles and recommendations for the parcels in light of the analysis, for example, consideration of boundary robustness and options to conserve, enhance, restore etc., have been captured in the proformas. The recommendations developed draw upon the field survey findings.

Table C1.8 - Assessment criteria

London Plan MOL Criterion 1: ‘Contributes to the physical structure of London by being clearly distinguishable from the built-up area’				
Potential data and information sources: Ordnance Survey mapping, 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>And/or:</p> <p>Urbanising influences such as adjacent development directly impact on the visual openness, likely not screened and affects the majority of the parcel, such that it makes no contribution to the physical structure of London.</p> <p>And/or:</p> <p>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>And/or:</p> <p>Sense of openness is relatively weakly defined with a clearly apparent sense of erosion by development and urbanising influences.</p> <p>Contributes to physical structure at a local (neighbourhood) scale - the open space is likely to be small in size.</p> <p>And/or:</p> <p>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>And/or:</p> <p>Sense of openness is mostly well-defined with only localised erosion by development and urbanising influences.</p> <p>Contribution to physical structure of London is apparent, although likely to be fragmented rather than intact. May be a small part of a larger open space.</p> <p>And/or:</p> <p>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>And/or:</p> <p>The parcel provides a clear and well-defined sense of openness and separation, such that sense of openness is more than apparent.</p> <p>Notable contribution to the structure of London – may be a large scale greenspace asset, although may have some localised erosion.</p> <p>And/or:</p> <p>Contains strong and possibly varied landscape structure and/or topographic variation, which define edge conditions.</p>	<p>Built development is completely absent.</p> <p>And/or:</p> <p>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>Highly notable and prominent contribution to structure of London (e.g. river valley, Metropolitan or regional scale park or greenspace). Likely to be a large or very large open space.</p> <p>And/or:</p> <p>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 2: '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 mapping, 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				
Weak	Weak-Moderate	Moderate	Moderate-Strong	Strong
A very local level and/or weakly performing GI67 asset/of low GI functionality. Contains no open-air facilities.	A GI site of neighbourhood level importance. And/or: 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. And/or: 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. And/or: Parcel contains 'destination' open air sports, recreational or cultural facilities of importance for several boroughs.	A strategic GI site of London-wide importance. And/or: Parcel contains 'destination' open air sports, recreational or cultural facilities of London-wide importance, which may also serve a catchment beyond London.

⁶⁷ Green Infrastructure (GI)

London Plan MOL Criterion 3: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value'				
Potential data and information sources: Ordnance Survey mapping, 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 (including other site of nature importance - OSNIs), UKBAP ⁶⁸ /Local BAP Habitat and Priority Habitat data, green infrastructure datasets, field survey.				
Assessment Thresholds and Definitions				
Weak	Weak-Moderate	Moderate	Moderate-Strong	Strong
Parcel contains no designations for heritage, recreation or biodiversity. Registered Parks and Gardens, scheduled monuments or listed buildings).	Parcel may contain features designated for historic value at a local level, such as conservation areas or locally listed buildings. And/or: Parcel may contain recreational features/function as a recreational landscape of local value (e.g. a local park). And /or: Parcel/part of the parcel may be designated for biodiversity at a local level, such as a SINC (local), local nature reserve (LNR), and other site of nature importance (OSNI).	Parcel may form a secondary or small/minor part of a Registered Park and Garden or scheduled monument (e.g. within the boundary but not forming one of the features listed in the citation/not part of a designed view included in the listing). And/or: Parcel forms a small part of or is partially linked to a GI asset of Metropolitan significance. May include a small part of a metropolitan recreational trail. And /or: Parcel/part of the parcel may be designated at a metropolitan level for biodiversity such as SINC (Metropolitan).	Parcel forms part of a Registered Park and Garden and is likely to contain some features listed in the citation. Features designated for their historic value at the national level (Registered Park and Garden, scheduled monument or listed buildings) may be present in a small part of the parcel. And/or: Parcel/ part of the parcel forms part of a Regional Park or other green space of Metropolitan importance. May include part of a metropolitan or national recreational trail. And/or: Parcel/part of the parcel is designated for biodiversity at the national level (SPA/SAC SSSI/NNR ⁶⁹ /ancient woodland).	Parcel is within 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. May contain multiple features designated for their historic value at a national level (Registered Parks and Gardens, scheduled monuments or listed buildings). And/or: Parcel forms an essential part of a Metropolitan/ Regional Park or other green space of metropolitan importance. May include an essential part of a national recreational trail. And/or: A significant part of the parcel is likely to be covered by national or international ecological designations (Ramsar/ SPA/SAC/SSSI/NNR/ancient woodland) ⁷⁰ .

⁶⁸ Biodiversity Action Plan (BAP)

⁶⁹ National Nature Reserve (NNR)

⁷⁰ Special Protection Area (SPA), Special Areas of Conservation (SAC); Site of Special Scientific Interest (SSSI)

London Plan MOL Criterion 4: 'Forms part of a strategic corridor, node or link in the green infrastructure network and meets one of the above criteria'				
Potential data and information sources: Local Plan Policy LP12, Google Earth, GIS green space datasets including OS Open Greenspace, GLA green blue cover, GLA tree canopy cover, other green space designations.				
Assessment Thresholds and Definitions				
Weak	Weak-Moderate	Moderate	Moderate-Strong	Strong
<p>A GI asset with very low or poor levels of accessibility and connectivity.</p> <p>And /or: Fragmented and severed habitat, likely to only provide a wildlife corridor at the most local level.</p>	<p>Has a generally fragmented green link/access network, likely to be of at most secondary level of importance to the GI network (e.g. may also include local routes/PRoWS⁷¹).</p> <p>And /or: Parcel is likely form part of a locally important wildlife corridor or has a generally fragmented character.</p>	<p>Has a partial green link/access network, which may in part fulfil a strategic function as part of a wider GI network.</p> <p>And /or: Parcel is likely to provide a small contribution to a strategic wildlife corridor London-wide importance, such as a river valley. Likely to be small or have a partially fragmented habitats.</p>	<p>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>And/or: Parcel is likely to form part of or directly connect to a strategic wildlife corridor of London-wide importance, such as a river valley. Likely to provide mostly continuous habitats.</p>	<p>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> <p>And/or: Parcel is likely to form a large part of a strategic wildlife corridor of London-wide importance, such as a river valley. Likely to provide continuous habitats of high quality.</p>

⁷¹ Public Right of Way (PRoW)

C2 LGS Methodology

C2.1 Overview

Local Green Space allows communities to identify and protect green areas of particular importance to them. There are clear criteria for the designation of Local Green Space in the NPPF, which is supported by national guidance: This states that LGS designations should only be used where green space is:

- In reasonably close proximity to the community it serves;
- Demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Local in character and is not an extensive tract of land.

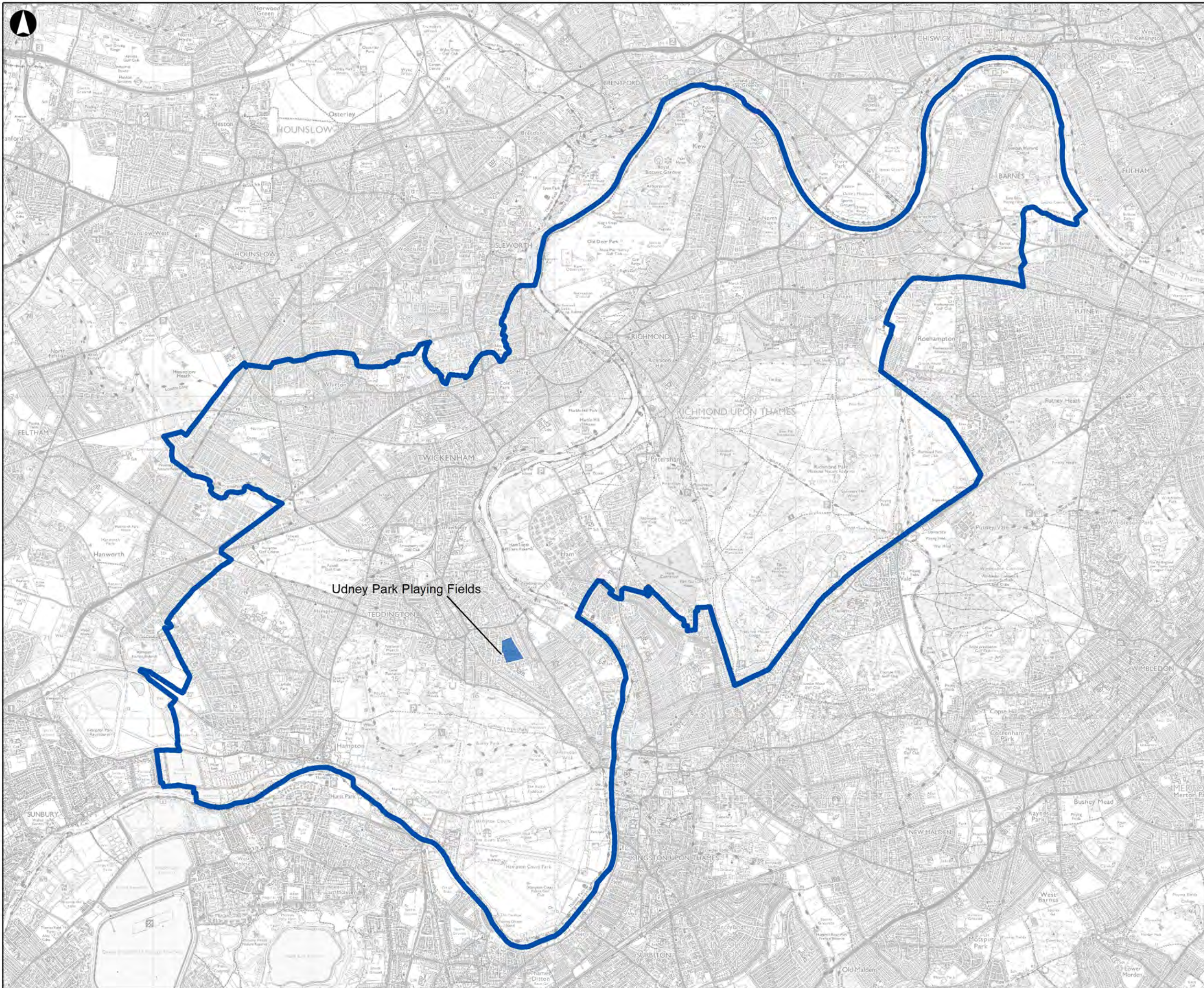
There is currently one LGS site in the adopted LBRuT Local Plan (Udney Park Playing Fields shown on Map C2.1), which was recently designated following a high court challenge. This was previously assessed against the 2012 NPPF and is not subject to further assessment. This assessment focuses on proposed LGS.

Policy LP 13 defines LGS as space which has been demonstrated to be special to a local community and which holds a particular local significance. The supporting text to the policy sets out the criteria to be taken into account in defining LGS:

- The site is submitted by the local community;
- There is no current planning permission which once implemented would undermine the merit of a Local Green Space designation;
- The site is not land allocated for development within the Local Plan; and
- The site is local in character and is not an extensive tract of land.

The method for the assessment of green spaces comprises 4 steps, set out as follows:

- Step 1: Site Identification;
- Step 2: Site Visits;
- Step 3: LGS Assessment;
- Step 4: Recommendations



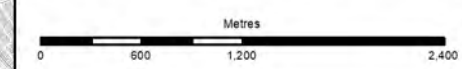
Udney Park Playing Fields

Legend

- LBRuT Local Green Space
- LBRuT Borough Boundary

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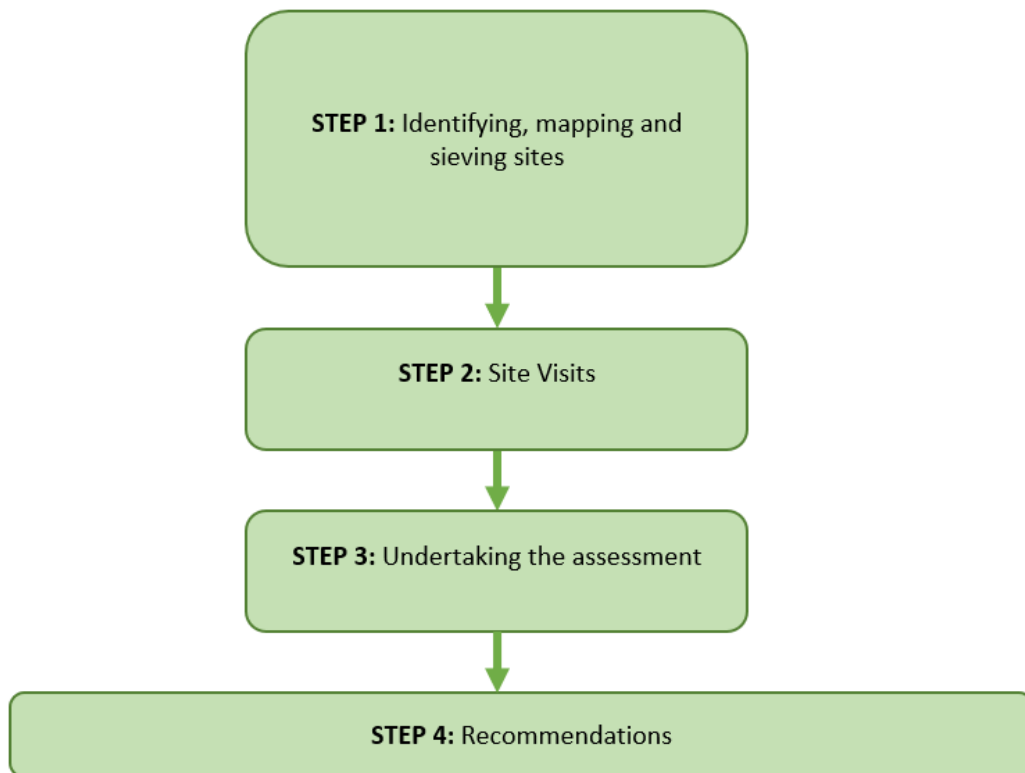
Client
London Borough of Richmond upon Thames

Job Title
LGS Review



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Drawing No C2.1	Issue P1

Figure C2.1 Method for assessment of Local Green Space

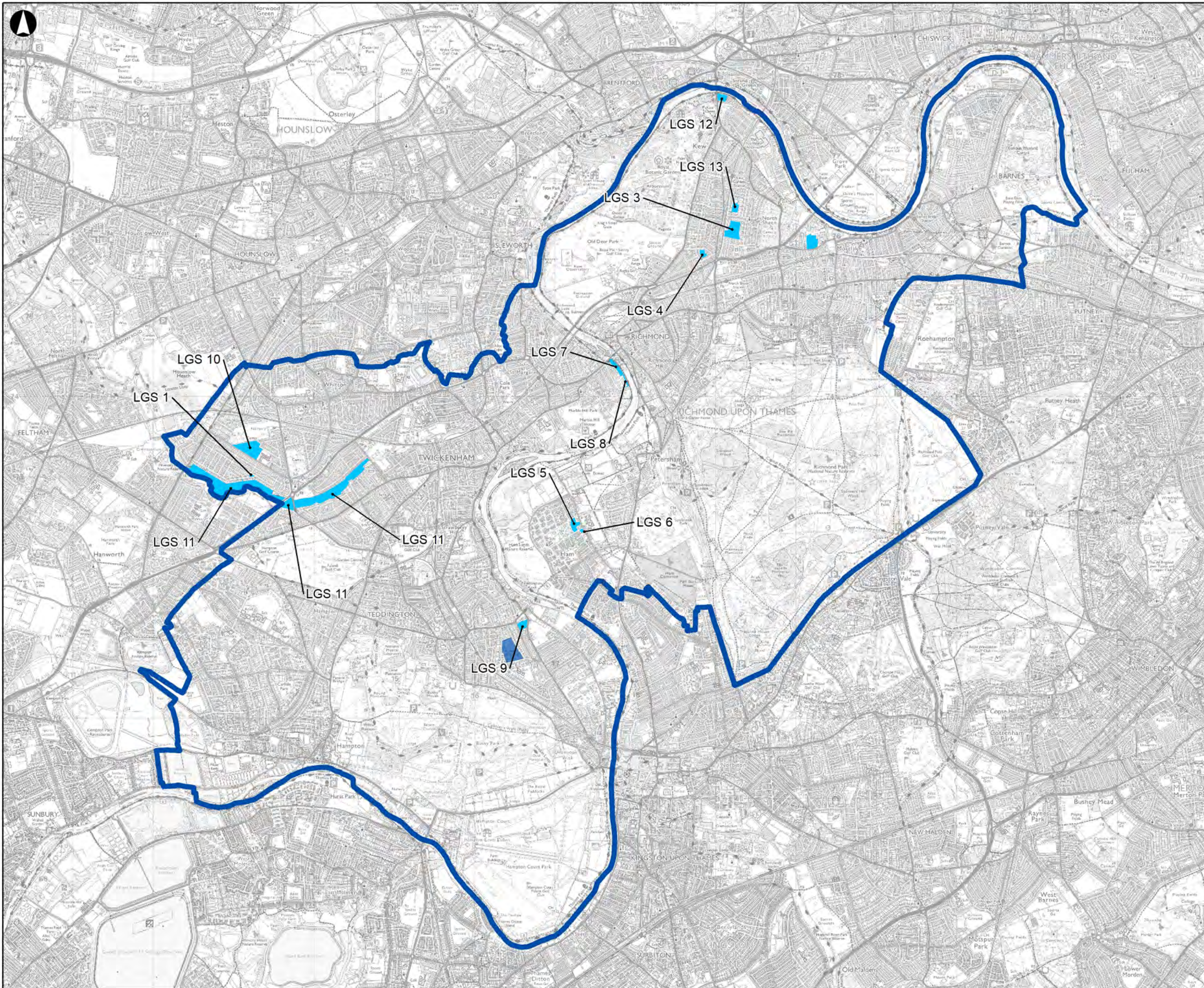
C2.2 Step 1: Site Identification

As part of the informal consultation on the Direction of Travel document, respondents were invited to propose sites for designation as LGS. Through this process 11 sites were proposed. These sites were mapped by Council officers at the outset of the study (Map C2.2).

The NPPF requires that LGS should be in close proximity for the community they serve. Given the specific characteristics of the Borough, most areas of green space are likely to be within easy walking distance of the community they serve, indicating close proximity. It was therefore considered that all sites proposed meet that requirement.

The NPPF also states that sites should be local in character and not an extensive tract of land: The PPG is clear that blanket designation of open countryside adjacent to settlements will not be appropriate, although it notes that there are no ‘hard and fast rules’⁷² about how big a Local Green Space can be. Any sites that were considered to be part of a more extensive area would not be considered for further assessment. It was judged that all sites proposed were local in character and small in scale.

⁷² Paragraph: 015 Reference ID: 37-015-20140306

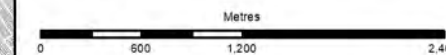


Legend

- LBRuT Local Green Space
- LGS Potential Sites
- LBRuT Borough Boundary

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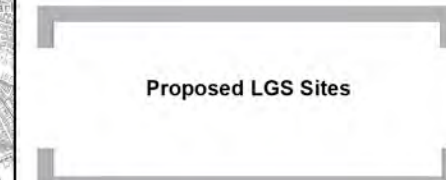


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The boundaries of the proposed LGS sites were checked through the site visits. Boundaries were adjusted as necessary to reflect the site characteristics as accurately as possible.

C2.3 Step 2: Site Visits

When possible, all proposed LGS were visited to understand their immediate context, character and boundary features, and to refine the initial analysis. Separate pro-formas for the LGS assessments were developed (in ESRI Collector to enable capture of raw data, in the field, in real time) to capture and verify information and recommendations during site visits and as the primary evidence base for reporting. Geo-referenced photographs of all LGS were taken (access permitting) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider built development as relevant.

C2.4 Step 3 - Assessment

The main part of the assessment focused on the NPPF criteria that Local Green Space sites must be ‘demonstrably special to a local community’ and ‘hold a particular local significance’. NPPF Paragraph 102 also sets out five ‘values’ that help identify the special nature or local significance of open space:

- Beauty
- Historical significance
- Recreational value
- Tranquillity
- Richness in wildlife

A set of assessment criteria was developed for each of these elements to assess the extent to which each of the sites met this criterion of the NPPF. The scoring system used when assessing each suggested area is based upon the five main criteria set out above. Each of these has been broken down into sub-criteria (set out below) which are scored between 0 and 5 points.

C2.4.1 Criterion 1: Beauty

Criteria	Score	Required attributes
Beauty	1	Limited visual attractiveness, limited variety of natural features, provides a limited contribution to the setting of the local area and sense of place.
	2	Good visual attractiveness, limited variety of natural features but of a good quality, provides a good contribution to the setting of the local area and sense of place.
	3	Good visual attractiveness, variety of natural features of a good quality, provides a good contribution to the setting of the local area and sense of place.

4	Very good visual attractiveness, good variety of natural features and of a good quality, provides a very good contribution to the setting of the local area and sense of place.
5	Excellent visual attractiveness, excellent variety of natural features and of good quality, provides an excellent contribution to the setting of the local area and sense of place.

C2.4.2 Criterion 2 Historic Significance

Criteria	Score	Required attributes
Historic Significance	0 (Null)	Has no notable / recorded historical value.
	3	Has significant recorded / demonstrable local historical value which can be readily experienced or interpreted from the public domain/ provides the setting for a Building of Townscape Merit.
	5	Incorporates, within or provides the setting for at least one statutory historical designation (this includes Conservation Areas, Registered Parks and Gardens, Listed Buildings and Scheduled Monuments) or is within an Archaeological Priority Area.

C2.4.3 Criterion 3: Recreational Value

Criteria	Score	Required attributes
Recreational Value	0 (Null)	Site has no public access or has no/ very limited recreational value.
	1	Site is accessible to the public if an entrance fee is first paid/or site is privately accessible to a limited group of people. Recreational value varies from site to site.
	2	Public access but no informal or formal uses and no notable recreation facilities.
	3	Public access, good range of informal uses and may include some limited facilities.
	4	Public access, good range of informal and formal uses and good facilities (fair condition and range).
	5	Public access, good range of informal and formal uses, excellent facilities (good/excellent condition and range).

C2.4.4 Criterion 4: Tranquillity

Criteria	Score	Required attributes
Tranquillity	1	Major and constant visual and audible disturbance: the area is heavily affected by a main road and / or by neighbouring uses e.g. industrial areas, or other areas with regular disturbance; and lack of / limited self-containment and screening.
	2	Some major visual and/or audible disturbance: the area has some disturbance by a main road / or by neighbouring uses e.g. industrial areas or other areas with regular disturbance; and / or lack of/ limited self-containment and screening.
	3	Some visual or audible disturbance: the area is located on a minor road with some irregular activities causing disturbance and may have some undisturbed parts; and / or lack of / limited self-containment and screening.
	4	Limited visual and audible disturbance: the site is located within a residential area with low levels of noise and visual intrusion from associated residential activities; and has limited / good degree of self-containment and screening.
	5	No disturbance: no visual or audible intrusion and provides a peaceful space within a busy urban environment; and has good / high degree of self-containment and screening.

C2.4.5 Criterion 5: Richness of wildlife

Criteria	Score	Required attributes
Richness of Wildlife	0 (Null)	The area is a monoculture / of no or little wildlife value.
	1	Contains one notable habitat.
	2	Contains two notable habitats.
	3	Contains three or more notable habitats.
	4	Contains / is within a county / locally designated area of wildlife value.
	5	Contains / is within an internationally / nationally / regionally designated area of wildlife value.

Wildlife sub-criteria

Sub-criteria	Definition
‘Notable habitat’	For the purposes of this criterion this is an area that has the potential to support wildlife e.g. mature trees, hedgerows, a pond, riverbanks etc.
County / locally designated area of wildlife significance	This includes designations such as Local Nature Reserves (LNRs), identified meadows etc, locally significant Other Sites of Nature Importance (OSNIs) and Sites of Importance for Nature Conservation (SINC) local and Borough (Grade 1/ 2)
Internationally / nationally / regionally designated area of wildlife significance	This includes Sites of Special Scientific Interest (SSSIs), Special Area of Conservation (SACs), Special Protection Areas (SPAs), regionally / nationally significant OSNIs and SINC of metropolitan importance.

C2.5 Step 4 Recommendations

The assessment seeks to appraise potential local green spaces against defined ‘values’ and the local interpretation of the values and roles.

- Any LGS scoring strongly or very strongly (4 or 5) against the criteria for one or more NPPF ‘values’ was judged to perform strongly.
- Any LGS scoring moderately (3) against at least one NPPF value and failing to score strongly or very strongly (4 or 5) against any value was judged as meeting the assessment criteria moderately.
- Any LGS scoring weakly or very weakly (1 or 2) across all NPPF ‘values’ was judged to meet the purpose assessment criteria weakly.

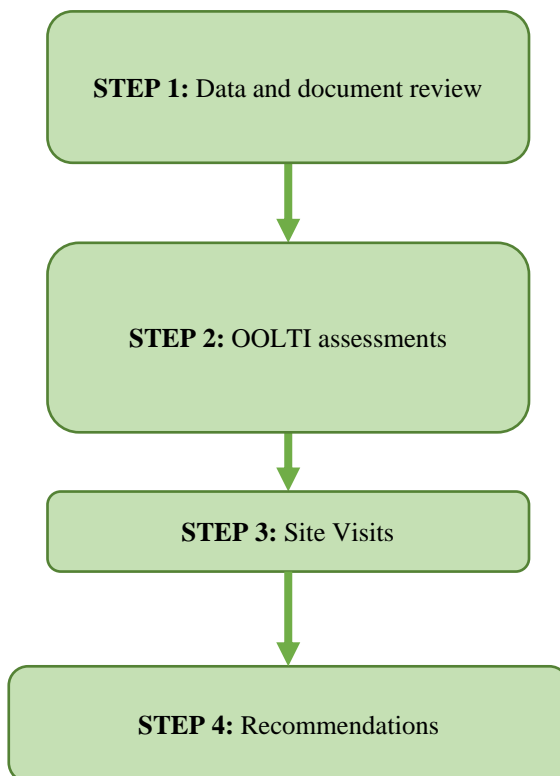
Stronger and moderately performing sites were identified for further consideration as designation as Local Green Space. Existing designations covering these sites were identified, to refine the recommendations and identify where the Council would need to consider further whether any additional benefit would be gained through their designation as Local Green Space.

C3 OOLTI Methodology

The assessment reviewed the 168 designated OOLTI sites (Map C3.1) against the aims and purposes set out in Policy LP14 of the Local Plan, assessing the extent to which each site meets the criteria. Land which no longer meets the purposes was identified and recommended for further consideration for removal of the designation. No other changes to the boundaries of the area were considered.

A stepped approach to the assessment was taken, as summarised in Figure C3.1.

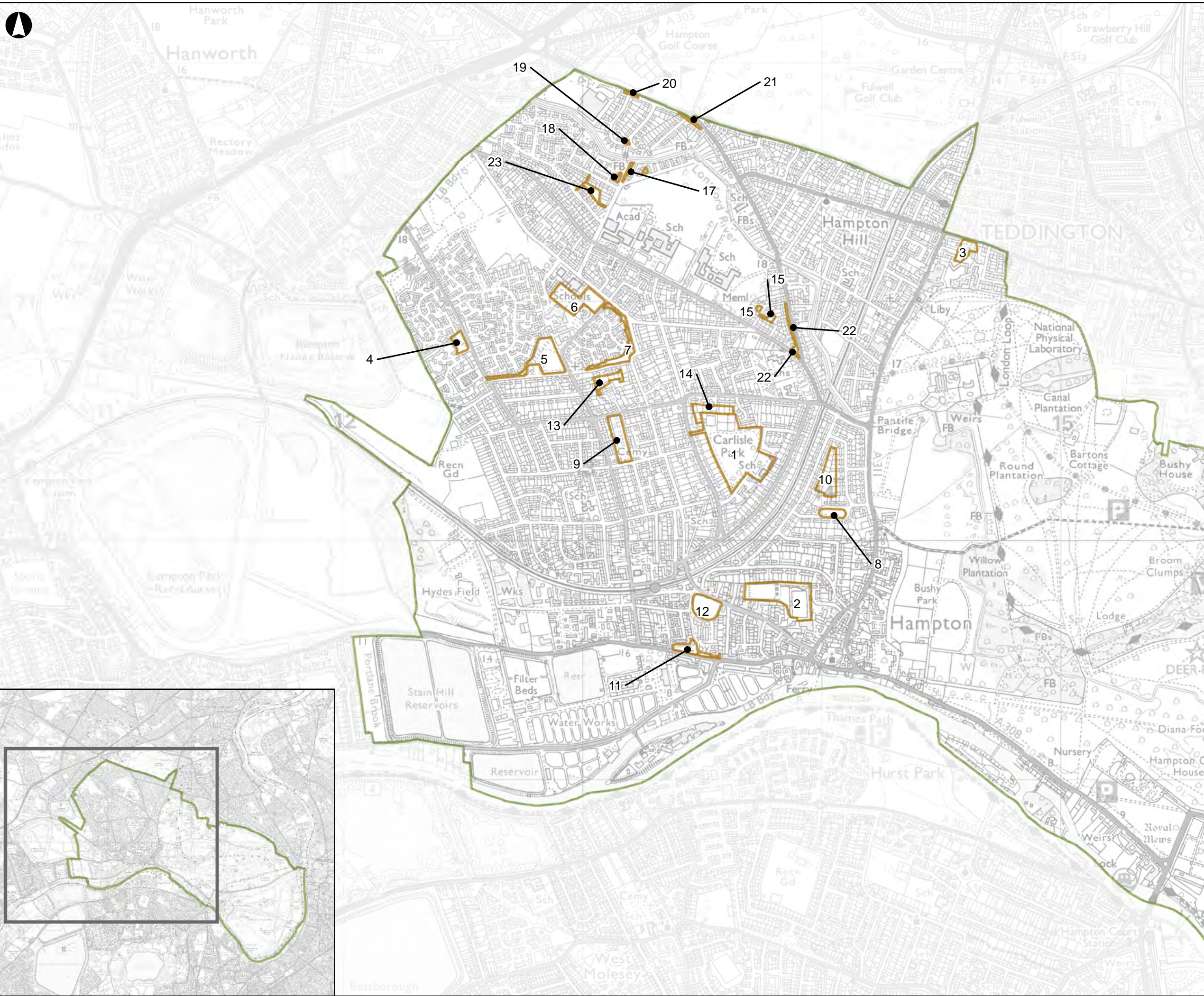
Figure C3.1 OOLTI Assessment Approach



C3.1 Step 1: Data and Document Review

We reviewed existing GIS data and relevant documents, including:

- Previous assessment undertaken by Allen Pyke Associates in 2006.
- Local Plan policy LP14 and LP12 (Green Infrastructure).
- Google Earth and Google Streetview.



Legend

- Place boundaries
- LBRuT OOLTI

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Job Title
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Other Open Land of Townscape Importance (OOLTI) - Hampton & Hampton Hill

[Sites: 1-23]

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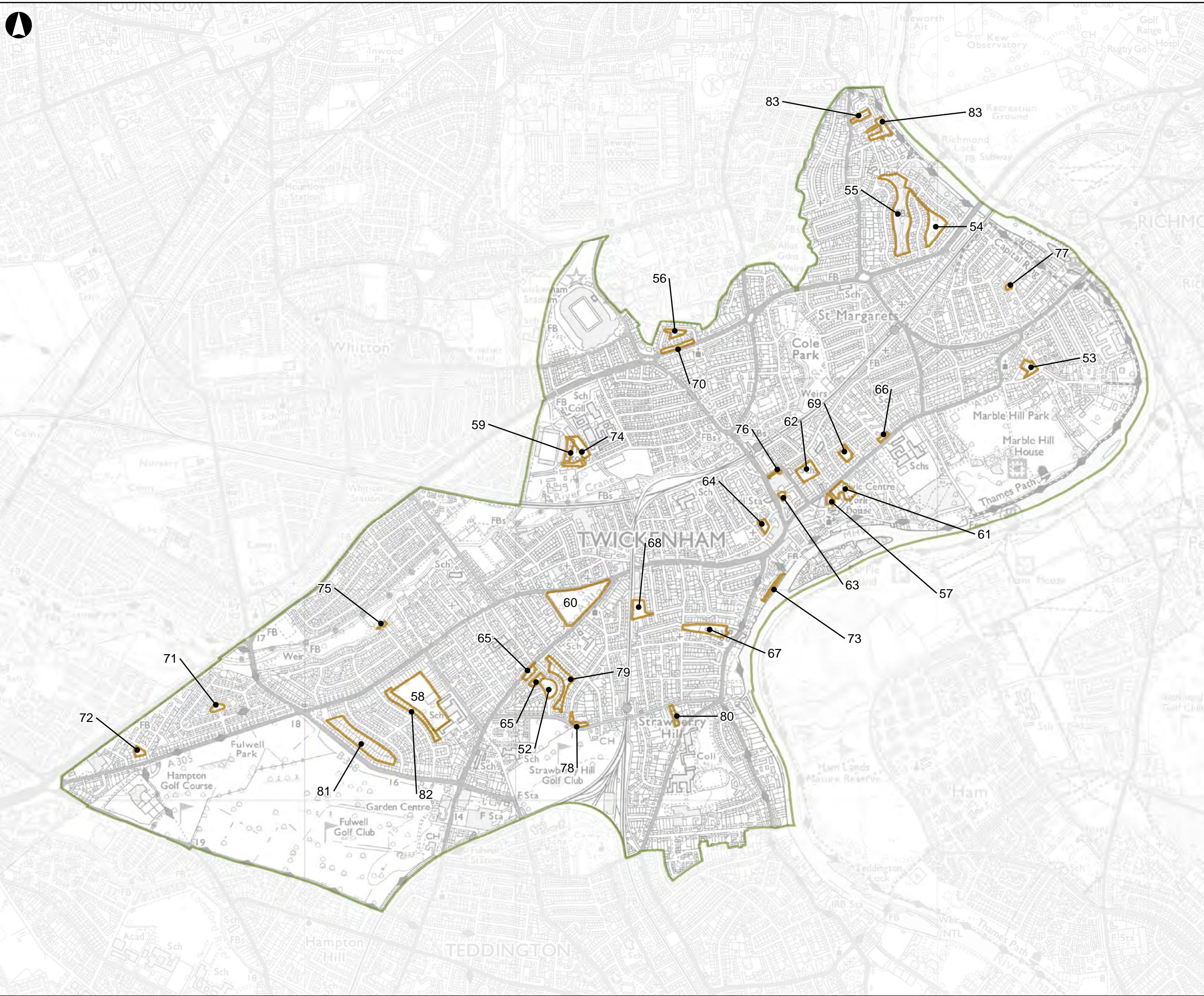
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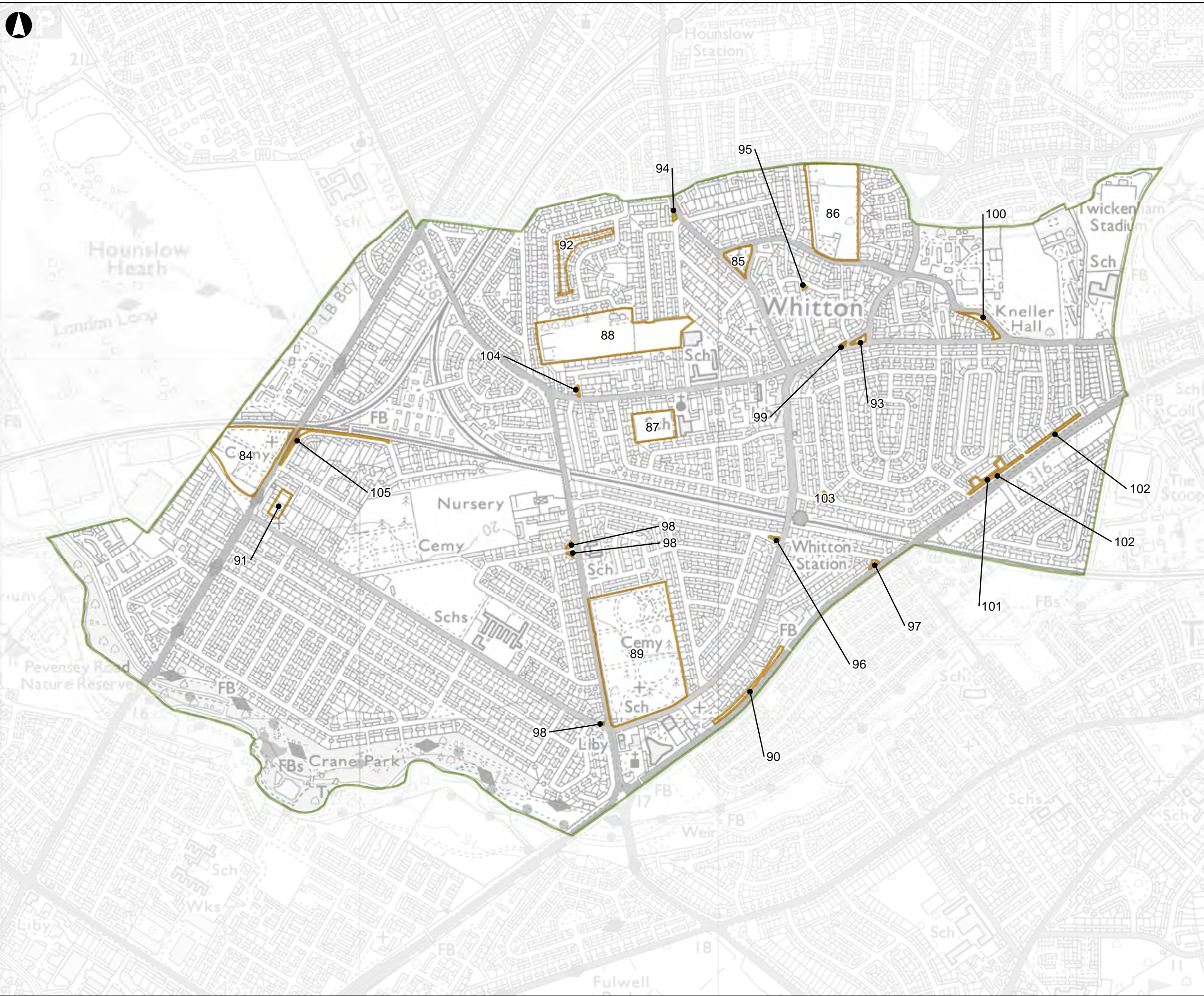
Other Open Land of Townscape Importance (OOLTI) - Twickenham, Strawberry Hill & St Margarets

[Sites: 52-83]

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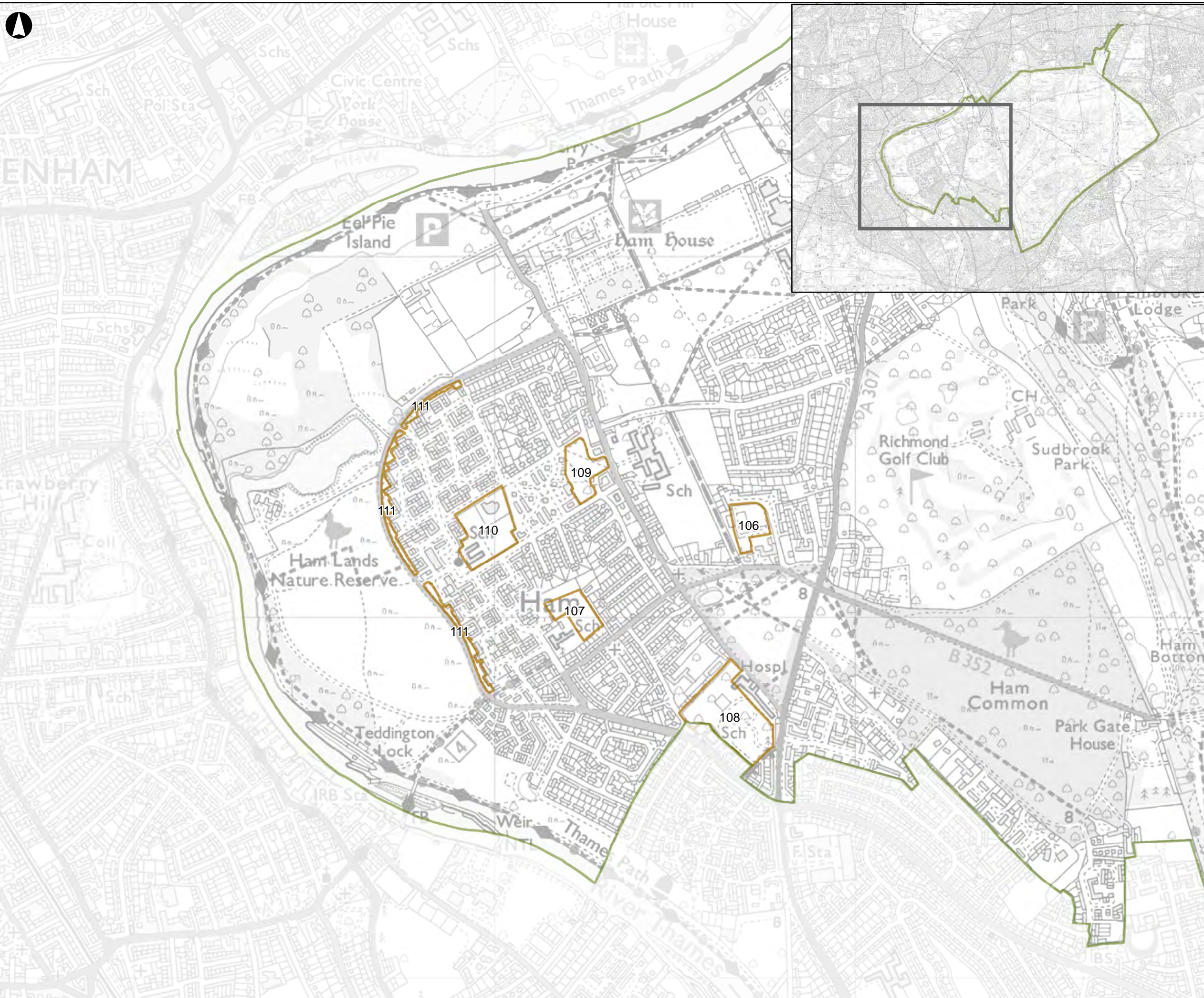
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Drawing No C3.5	Issue P1



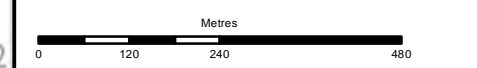
Legend

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Other Open Land of Townscape Importance (OOLTI) - Ham, Petersham & Richmond Park [Sites 106-111]

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Drawing No C3.6	Issue P1
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Legend

- Place boundaries
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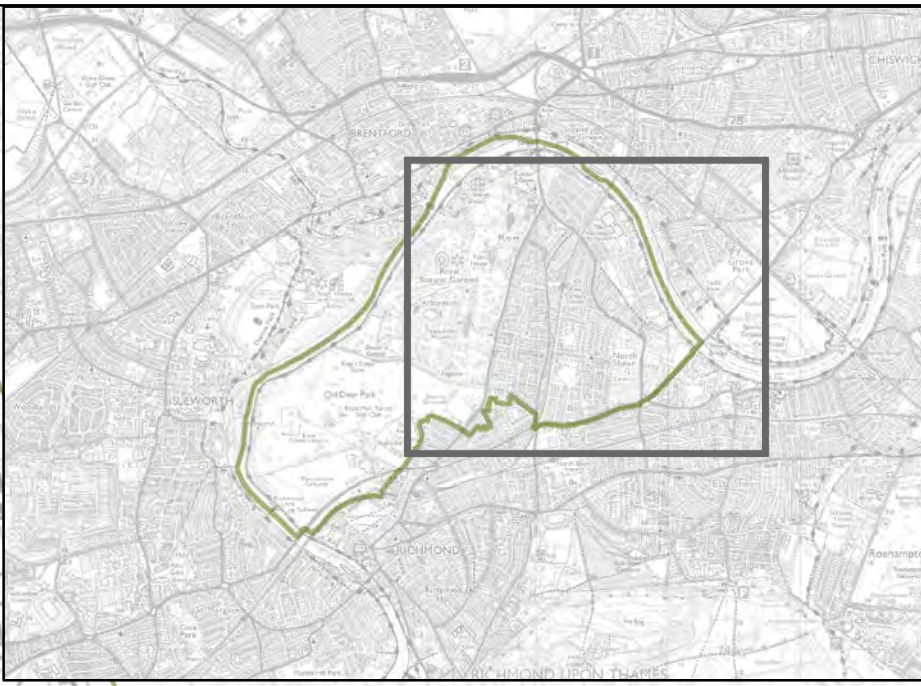
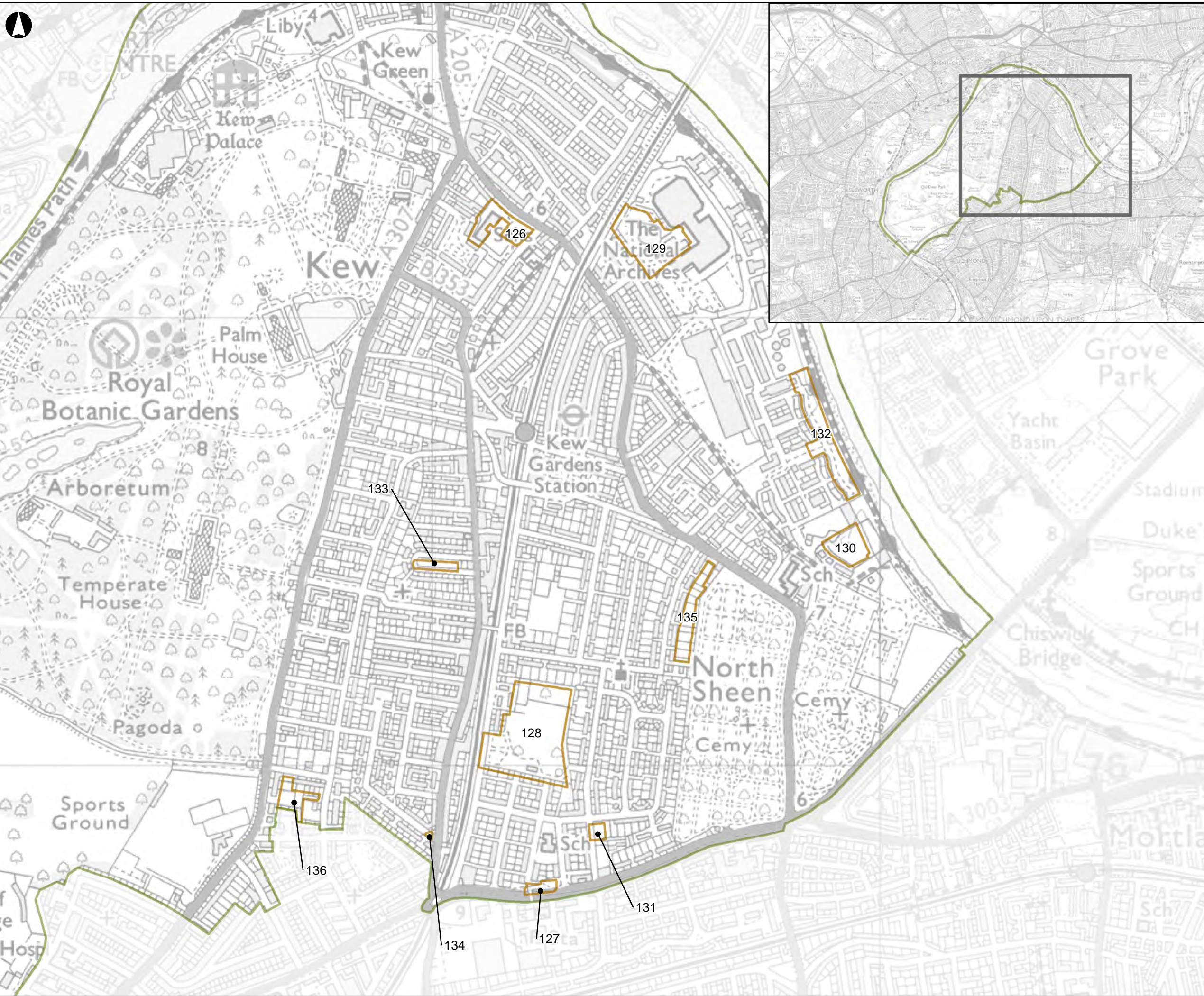
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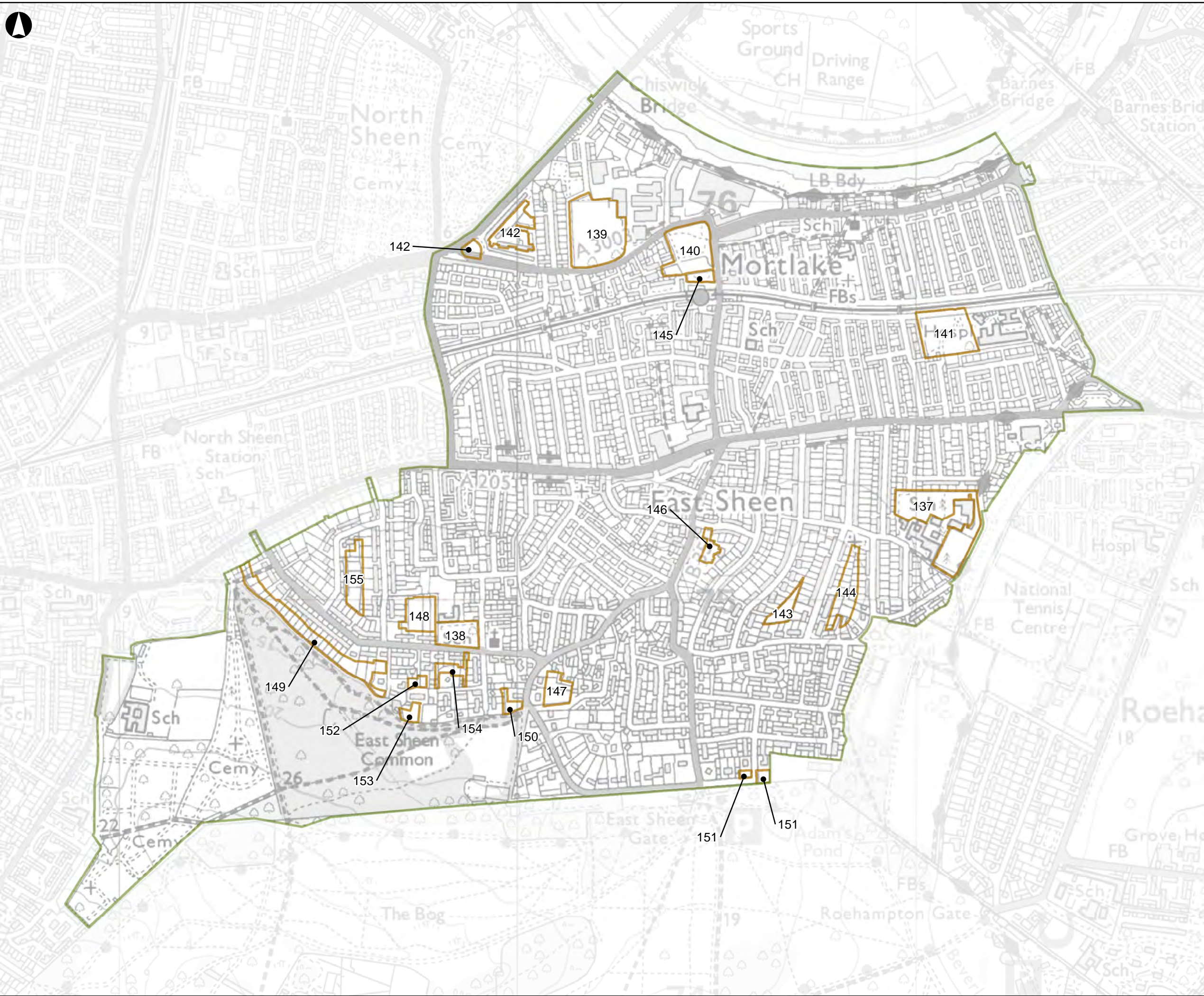
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[Sites:126-136]

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Job Title
OOLTI Review

Other Open Land of Townscape Importance (OOLTI) - Mortlake & East Sheen



[Sites:137-155]

Scale at A3
1:9,000

Job No 280272-00	Drawing Status Issue
Drawing No C3.9	Issue P1

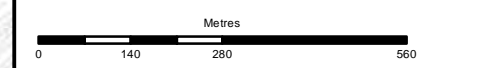


Legend

-  Place boundaries
-  LBRuT OOLTI

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P1	10/05/2021	NA	KF	AR
Issue	Date	By	Chkd	Appd



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Client
London Borough of Richmond upon Thames

Job Title
OOLTI Review

Other Open Land of Townscape Importance (OOLTI) - Barnes

[Sites: 156-168]

Scale at A3
1:11,500

Job No 280272-00	Drawing Status Issue
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Drawing No C3.10	Issue P1
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C3.2 Step 2: OOLTI Assessments

The assessment combined analysis from the desk-based research with information from site visits. Each site was assessed against the criteria in Local Plan policy LP14 as described in the following tables. As per policy LP14, not all criteria need to be met, in order for a site to be designated OOLTI. The purpose of OOLTI is to protect open use and OOLTI does not have to be publicly accessible.

C3.2.1 Initial assessment

Initial assessment: Is the site predominantly open (if 'yes' – continue with assessment against criteria 1-5). If 'no', provide commentary and skip to Recommendations	
Data sources: Google Earth.	
Assessment definitions	
No	Yes
Site is predominantly developed and not open.	Site is predominantly undeveloped.

C3.2.2 Criterion 1

Contribution to the local character and/or street scene, by virtue of its size, position and quality 1:		
Contribution to the local character and/or street scene, by virtue of its size, position and quality		
1 a): size		
Data sources: measure site areas (GIS output)		
Assessment definitions (Site sizes reflect the spread of the existing OOLTI sites).		
Low	Medium	High
Under 0.1 ha	Between 0.1 – 0.5 ha	Over 0.5 ha
1 b): position		
Data sources: Google Earth, Google Streetview. Village Plan SPDs, LBRuT Urban Design Study (UDS) (in progress – work in progress will feed in where possible), some sites may require site visits.		
Assessment definitions		
Low	Medium	High
Minimal contribution to local character and street scene e.g. is behind houses (little visibility from the public realm).	Forms a noticeable contribution to the street scene. May not be identified as valued features in character studies but nevertheless contribute as part of wider open spaces. e.g. open space along a street and the site is noticeable in views along the street (some visibility from the public realm).	Forms a significant contribution to the street scene e.g. forms a local landmark, focal point or an notable feature in the local area. Plays an important role in breaking up built form. Is identified as a valued feature in character studies.
1 c): quality		
Data sources: Google Earth, Google Streetview. Some sites may require site visits.		
Assessment definitions		
Low	Medium	High
Low quality indicated by being in a poor state of repair, signs of decay, under-managed or degradation of the open space or parts of it, through development for other uses such as car parking, sub stations. Low quality may also	Medium quality indicated by being generally well maintained, though there may be signs of decay or degradation in some components. Few characteristic elements e.g. an area of grass with few trees. Generally could be described as	High quality indicated by being intact, in good physical condition and well-managed. Characteristic elements such as mature trees. Contributes to high scenic quality. Sites of high scenic quality with harmonious or special pattern of landscape elements, important

be indicated by discordant elements, fragmentation, visual intrusions which may make the space feel unsafe.	being of reasonable/fair quality or condition.	features in views and distinctive natural or historic elements that contribute to local character.
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C3.2.3 Criterion 2

Value to local people for its presence and openness

2: Value to local people for its presence and openness		
Data sources: Google Earth, Google Streetview. Reference to Allen Pyke survey where relevant. Some sites may require site visits.		
Assessment definitions		
Low	Medium	High
Sites unlikely to be particularly valued by local people e.g. because they are no longer predominantly open. Sites are not accessible/do not have facilities for leisure and recreation. Site feels unsafe.	Sites which are predominantly open but may not be accessible. Site is likely to be of some value to local people for its presence and/or openness (for example site provides visual benefit, increases attractiveness to immediate surroundings).	Accessible sites which are predominantly open. Sites which appear to be well-used (through provision of visitor facilities, recreation, play seating or interpretation). Sites likely to be valued for their scenic quality, distinctiveness, natural/historic interest, or as a visual backdrop.

C3.2.4 Criterion 3

Immediate or longer views into and out of the site, including from surrounding properties

3: Immediate or longer views into and out of the site, including from surrounding properties		
Data sources: Google Earth, Google Streetview. Some sites may require site visits to confirm.		
Assessment definitions		
Low	Medium	High
Largely not visible from publicly accessible locations (e.g. only visible from the backs of properties)	Immediate views only into and out of the site, including from surrounding properties e.g. visible from only a few surrounding properties or private roads/public rights of way.	Immediate and longer views into and out of the site e.g. views across expansive nearby open spaces or from main roads and railways. May be identified as a local view in character studies.

C3.2.5 Criterion 4

Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 ‘Green Infrastructure’

4: Contribution to a network of green spaces and green infrastructure as set out in policy LP12 in 5.1 ‘Green Infrastructure’.		
Data sources: Local Plan Policy LP12, Google Earth, GIS green space datasets including OS Open Greenspace, GLA green blue cover, GLA tree canopy cover, other green space designations.		
<p>Assessment Thresholds and Definitions</p> <p>‘Green infrastructure’ as defined in Local Plan Policy LP12 5.1.2 (“The green spaces and green features that contribute to and make up the overall green infrastructure network range from borough-wide and strategic features such as parks, watercourses, woodlands to local features such as playgrounds, sports pitches, allotments, public open spaces, trees, woodlands, private gardens and other green spaces used for recreational purposes. There are also other features such as highway verges, railway embankments as well as site-specific elements such as green roofs and green walls that are considered to be part of the wider green infrastructure network.”)</p> <p>Distances are based on professional judgement. The distances were generated automatically by GIS data and ‘sense-checked’ using Google Earth. The scoring may therefore sometimes be moderated up or down to compensate for errors with data, for example where there is no visible green space/vegetation (due to GIS data picking up green space within the site itself and not its surroundings) or no green space within 100m being visible on aerial mapping.</p>		
Low	Medium	High
None or minimal green infrastructure on the site (as defined by the London Plan and Policy LP12) and seems to make little contribution to the network of green spaces and green infrastructure (i.e. is over 50m from any green infrastructure elements identified in the ‘London green blue cover’ or ‘tree canopy’(GLA GIS data). Aerial mapping indicates the site makes no or minimal contribution to the green infrastructure network as it contains little or no vegetation/green space on the site and its environs (Google Earth).	Site is green space or green infrastructure (as defined in the London Plan and Policy LP12) and the site is adjacent to (or within 50m of) other green infrastructure as defined on the ‘London green blue cover’ or ‘tree canopy’ (GLA GIS data) although not within 100m of another mapped green space (i.e. a designated open space or green space shown on OS Open Greenspace map). Aerial mapping indicates the site makes some contribution to the green infrastructure network as it contains vegetation/green space which is connected to a wider network of vegetation/green space beyond the site (Google Earth).	Site is green space or green infrastructure as defined by the London Plan or Local Plan Policy LP12 and contributes strongly to a network of green spaces and green infrastructure i.e. is close (under 100m) of a mapped green space (i.e. a designated open space or green space shown on OS Open Greenspace map). Aerial mapping indicates the site makes a strong contribution to the green infrastructure network by visibly linking to a large green space or corridor beyond the site (Google Earth).

C3.2.6 Criterion 5

Value for biodiversity and nature conservation and meets one of the above criteria

5: Value for biodiversity and nature conservation and meets one of the above criteria		
Data sources: GIS – biodiversity designations		
Assessment Thresholds and Definitions		
Low	Medium	High

No nature designations on any part of the site	The site (or part of it) is covered by local biodiversity designations e.g. local nature reserve (LNR), SINC (local) and other site of nature importance (OSNI), habitat of principal importance/ BAP Priority habitats	The site (or part of it) is covered by borough or national biodiversity designations e.g. SPA, SAC, NNR, SSSI, SINCs and Ramsar at borough level or higher, ancient woodland.
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C3.2.7 Other Designations

A note was made of any other designations that applied to the site. The following designations were recorded:

- World Heritage Site
- Archaeological priority area
- Conservation area
- Listed buildings
- Registered park and garden
- Scheduled monuments
- EA flood zone
- Ancient woodland
- Green Belt
- MOL
- Local Green Space
- Ramsar site
- Special Protection Area
- Special Area of Conservation
- National Nature Reserve
- Site of Special Scientific Interest (SSSI)
- Local Nature Reserve
- SINC (Metropolitan/Borough Grade I/Borough Grade 2/Local)
- Other Site of Nature Importance (OSNI)

C3.3 Step 3: Site Visits

Site visits were undertaken as needed, for sites where information could not be sufficiently gleaned from desk study.

C3.4 Step 4: Recommendations

Overall performance against OOLTI criteria was determined as follows:

- Any site scoring ‘high’ against one or more of the criteria was judged to meet the criteria strongly. As criterion 1 comprises 3 sub-criteria, a lower weighting was applied to criterion 1a (size) where the other two sub-criteria scored lower. Therefore, some sites which scored high for criterion 1a only may be judged to score medium or low for criteria 1 overall.

- Any site scoring ‘medium’ against at least one of the criteria and failing to score ‘high’ against any criteria was judged as meeting the criteria moderately.
- Any site scoring ‘low’ across all criteria was judged to meet the criteria weakly.

C4 Duty to Co-operate Consultation

LBRuT sought feedback on the methodology from adjoining Local Authorities and the GLA to ensure consensus on the approach. Stakeholders were able to provide written comments on the draft Methodology. Other statutory bodies were also notified of the review as part of the Council's Duty to Co-operate. Table C4.1 presents the consultee responses and details Arup's response and where appropriate, the change made.

Table C4.1 Duty to cooperate Comments and Responses

Consultee	Consultee Response	Response
TfL Planning, TfL	Thank you for consulting Transport for London (TfL). I can confirm that we have no comments to make on the draft methodology.	Noted
GLA	No comment	Noted
Highways England	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. For Richmond Borough, our interests lie in the M4 to the north and M3 south just outside the borough boundary.</p> <p>Our interest in local plan documents is specifically focussed on the council's approach to highway and transport matters in relation to regeneration and new development. We are keen to understand how local authorities initially identify and prioritise transport improvements in order to deliver sustainable development. Specifically how local authorities set and implement policy to manage trip demand and ultimately how these might contribute to the safe and efficient operation of the Strategic Road Network for which we are responsible.</p> <p>We have reviewed the Draft Methodology Paper, and given that the consultation relates to Open Spaces and not transport matters. We are satisfied that the outcome of the consultation will not materially affect the safety, reliability and / or operation of the SRN (the tests set out in DfT Circular 02/2013, particularly paragraphs 9 & 10, and MHCLG NPPF2019, particularly paragraphs 108 and 109). We have no comments or objections.</p>	Noted
Historic England	We are content that the proposed methodology for reviewing open space designations in Richmond-upon-Thames is appropriate in its consideration of historic environment matters. We note that the Green Belt Assessment methodology proposes to exclude criterion 4 of the NPPF purposes, viz. 4. To preserve the setting and special character of historic towns which would be of	Noted

Consultee	Consultee Response	Response
	<p>most direct relevance to consideration of heritage significance, but concur with the view expressed in paragraph 3.4.1 of the report on this matter.</p> <p>We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.</p> <p><i>[Note: paragraph 3.4.1 is renumbered as section C1.5.2 in this report]</i></p>	
Natural England	Thank you for consulting Natural England on this matter. At this time, Natural England has no comments to make on the proposed study methodology.	Noted
RB Kingston upon Thames	We have reviewed the document on the open space designations: Green Belt, Metropolitan Open Land, Local Green space and Other Open Land of Townscape Importance and we noticed that on the maps one MOL area in Kingston is missing. This is MOL 1- land to the northwest of the River Thames, south of Burnell Avenue, southeast of Teddington Lock.	Maps revised to include missing MOL area.
Spelthorne Borough Council	<p>Thank you for giving Spelthorne Borough Council the opportunity to comment on the London Borough of Richmond Green Belt, MOL, LGS and OOLTI Review Methodology Paper. We have the following officer level comments to make:</p> <p>Under the duty to cooperate, local authorities are required to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local Plan preparation in the context of strategic boundary matters. Green Belt is a strategic, cross-boundary matter and as such we consider it beneficial that LB Richmond have appointed Arup to complete the review. Using the same consultants as Spelthorne and many other neighbouring local authorities should ensure a level of consistency between our various studies. In terms of the details of the draft Methodology, a number of points are raised below which may require further consideration by LB Richmond:</p>	Noted
	<p>Green Belt</p> <p>The Green Belt review methodology is generally considered to be robust and gives due consideration to each element of the assessment process. The identification of Strategic Areas across the wider area is welcomed. The</p>	Noted

Consultee	Consultee Response	Response
	<p>identification of Strategic Area A is consistent with the Spelthorne Green Belt Assessment.</p> <p>Paragraph 3.1 states that ‘It should be noted that the scope of the Study does not include consideration of non-Green Belt/ MOL land for inclusion in the Green Belt or MOL’. Earlier in the report however, section 1.2 sets out that ‘It may also consider whether there is any additional land, which should be added to the Green Belt’. This may be considered at odds therefore some clarifying text should be added.</p> <p><i>[Note: paragraph 3.1 is renumbered as section C1.1 in this report]</i></p> <p>In terms of the assessment of Purpose 3 at Table 3.7, when compared to the Spelthorne Green Belt Assessment stage 1, which was also undertaken by Arup, the percentages of built form at each scoring level varies. It is appreciated that there are differences in local authority character and area designations however the variations in the scoring scale may result in different Purpose 3 scores. This should therefore be considered when assessing the performance of the Green Belt in relation to the wider strategic area given its significance.</p> <p><i>[Note: Table 3.7 is renumbered as Table C1.7 in this report]</i></p>	<p>Text amended in Section 12.</p> <p>The percentage thresholds used in the Purpose 3 scoring align with the thresholds adopted for the Hounslow Green Belt Stage 1 assessment (undertaken by Arup in 2015) and Stage 2 assessment (undertaken by Arup in 2019). This approach was taken since Hounslow is considered to be more comparable to Richmond in terms of character – with Hounslow comprising more of a built-up urban character than Spelthorne.</p> <p>Whilst the percentage thresholds used across Richmond and Spelthorne may vary to account for local context, the qualitative scoring text does not – for example, across the two methodologies, a score of 3 would mean:</p> <ul style="list-style-type: none"> - Spelthorne Stage 1 assessment methodology (2018): a GA containing less than 10% built form and/or possesses a largely rural character - Richmond Stage 1 assessment methodology (2020), a GA containing less than 20% built form and/or possesses a largely rural character <p>The percentage thresholds of built form will be used in combination with qualitative judgement to categorise the General Area character and therefore it is not anticipated that the variation in percentage thresholds will result in different Purpose 3 scores across the two boroughs.</p>

Consultee	Consultee Response	Response
	<p>Local Green Space</p> <p>Spelthorne Borough Council has no comments to make on the Local Green Space section. The methodology appears to be comprehensive and considers the recent Udney Fields high court decision.</p>	<p>Noted</p>
	<p>OOLTI</p> <p>Generally, the OOLTI assessment methodology appears to be comprehensive however Spelthorne has identified the following points which may require further consideration. There seems to be limited reference to the assessment of accessibility and to the assessment of opportunities for formal and informal recreation on some of the spaces likely to fall under this categorisation. It would be beneficial for the assessment to break down the spaces under the OOLTI policy further in order to identify the different typologies of space within this over-arching category. This would then allow for an assessment of the role that some of the spaces perform especially in terms of recreation, either through the provision of facilities to support more formal recreation opportunities and any play facilities for younger people. The issue of accessibility should also be given due consideration, particularly defining a suitable distance that a person should travel to access an open space based upon the typology. It is unlikely that all parts of the Borough will have the same level of provision of all typologies of open space and which are all equally accessible. These factors do not appear to have been considered in the OOLTI methodology or, if they have been, there is no reasoning given as to why this has not been included.</p>	<p>The purpose of OOLTI is to protect open use. OOLTI does not have to be publicly accessible. For information, the Council’s <u>research</u> on pitches/open spaces etc. for sport and recreation will need to be reviewed separately to inform the new Local Plan.</p> <p>Sections 2.2.4 and B4.1 amended to highlight the accessibility point.</p>