

Cabinet Background Documents



12. Issues and Options Consultation on the Croydon Local Plan Review (Pages 3 - 280)

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Key decision: Yes

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Strategic Housing Market Assessment Update

London Borough of Croydon

August 2019

Prepared by

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DATE
August 2019

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1 INTRODUCTION

- 1.1 GL Hearn has been commissioned by the London Borough of Croydon to carry out an update to their Strategic Housing Market Assessment in light of the publication of the National Planning Policy Framework (NPPF (2018 and subsequently 2019) to inform the development of their new Local Plan.
- 1.2 The current Croydon Local Plan was adopted in February 2018, however, the Council is currently updating this to reflect the strategic direction outlined in the Draft London Plan. The Council is working towards the publication of the Local Plan in 2022. The Emerging Croydon Local Plan has a plan period of 2019-2036. This document reflects the need within that period.
- 1.3 This work updates and adds to previous work assessing housing need in Croydon. The most recent of which was set out in the Croydon Strategic Housing Market Assessment (SHMA) in June 2015.

NPPF (2019) and PPG

- 1.4 The methodology used in this report responds to the NPPF (2019) at the time of publication which sets out the Government's objective to significantly boost housing supply, and the current Planning Practice Guidance (PPG) on *Housing and Economic Needs Assessments*.
- 1.5 Chapter 5 of the NPPF (2019) relates to delivering a sufficient supply of homes. with Paragraph 60 setting out that "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard methodology" which is this report. However, in exceptional circumstances, an alternative approach could be justified.
- 1.6 In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. This, however, would be the housing requirement rather than the housing need.
- 1.7 Paragraph 61 of the NPPF (2019) sets out that "Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed". It adds these specific groups include but are not limited to:

"those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes".

1.8 It is clear from the NPPF (2019) and the PPG that the Local Housing Need (LHN) derived from the standard methodology is to act as a minimum and there is ample scope and indeed it is encouraged for local authorities to provide housing in excess of this.

1.9 Paragraph 10 of the PPG¹ sets out the circumstances when a higher figure than the standard method needs to be considered including but not limited to:

“growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);

strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or

an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.”

1.10 Therefore, the London Borough of Croydon could align housing need with the identified growth in the draft London Plan or indeed any other aspiration document seeking a higher level of growth above the standard methodology.

1.11 It should be emphasised that this report does not set housing targets. It provides an assessment of housing need, based on Government guidance at the time of writing, which is intended to provide an input to plan-making alongside wider evidence including land availability, environmental and other development constraints and infrastructure.

Report Structure

1.12 Following this introductory section, the remainder of the report is structured as follows:

- Section 2: Housing need and population growth
- Section 3: Economic growth and housing need
- Section 4: Affordable housing need
- Section 5: Housing mix
- Section 6: Needs of specific groups
- Section 7: Summary and conclusions

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/687239/Draft_planning_practice_guidance.pdf

2 HOUSING NEED

Introduction

- 2.1 Paragraph 214 of the revised NPPF (2019) states that any plans submitted after the 24th of January 2019 should be based on the 2019 version of the NPPF including the standard methodology. As the London Borough of Croydon is currently preparing a partial review of the Local Plan nevertheless given that the methodology for housing need has been updated in the NPPF and this is major change to be addressed in the review then the revised framework applies.
- 2.2 In assessing housing need and deriving a housing target that means adopting the three-stage standard methodology. This is set out in the Planning Practice Guidance (PPG) in relation to Housing and Economic Needs Assessments was revised in July 2018, again in September 2018 and most recently in February 2019.
- 2.3 Our approach below sets out the standard method for assessing housing need using the worked example set out in the PPG.
- 2.4 Three growth scenarios have been tested; these are:
- Scenario 1: Standard Method. This is the housing need derived from the Standard Method.
 - Scenario 2: The Croydon Local Plan. This is the housing need based on the housing requirement in the Croydon Local Plan.
 - Scenario 3: The Draft London Plan. This is the housing need based on the housing requirement in the Draft London Plan.

Scenario 1: Standard Method

- 2.5 The PPG in relation to Housing Need Assessment was revised in July 2018, again in September 2018 and most recently in February 2019. The revised PPG at paragraph 4 sets out the standard methodology for assessing housing need.
- 2.6 Paragraph 214 of the revised NPPF (2019) states that any plans submitted after the 24th of January 2019 should be based on the 2019 version of the NPPF including the standard methodology. As the London Borough of Croydon is currently updating the Local Plan and working towards adoption in 2022, then the revised framework applies. This means adopting the three-stage standard methodology set out below.

Step 1 - Setting the baseline

2.7 The PPG advises that “the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being the first year)” should be used. We have interpreted the “current year” as 2019 to align with the start of the plan period.

2.8 Croydon’s household projections (2014-based projections) are:

- 164,763 households in 2019
- 189,489 households in 2029

2.9 This is a total of 24,726 new households over the 10-year period, equivalent to an average household growth of 2,473 per year.

Step 2 - An adjustment to take account of affordability

2.10 The Step 2 then adjusts step 1 based on the affordability of the area. This draws on the most recent median workplace-based affordability ratios. The formula for the adjustment is calculated as below:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25$$

2.11 Croydon’s median workplace-based affordability ratio is 11.13. Using the above formula results in an adjustment factor of 0.446 (44.6%) and is used as below:

- Minimum annual local housing need figure = (1 + adjustment factor) x projected household growth

2.12 For Croydon this means:

$$(1 + 0.446) \times 2,473 = 1.446 \times 2,473 = 3,574 \text{ dwelling per annum (dpa).}$$

Step 3 - Capping the level of any increase

2.13 Stage 3 of the standard method applies a cap which limits the increases an individual local authority can face. The cap depends on the status of relevant strategic policies for housing. In practice, this only effects local authorities who have an adjustment greater than 0.4. This is the equivalent of an affordability ratio of 10.4.

2.14 Croydon's Local Plan was adopted under five years ago (2018) and reports the need for an additional 32,890 new homes by 2036. This equates to approximately 1,644 dwellings per annum over the plan period compared to 3,574 per annum from Step 2.

2.15 The local housing need figure is capped at 40% above the lower of the average housing requirement or the output from Step 2. In this instance it is capped at 40% above 1,644 dwellings per annum set out in the existing policy. Capping the level of any increase is as follows:

$$\text{Cap} = 1,644 + (40\% \times 1,644) = 1,644 + 981 = 2,302$$

2.16 The capped figure is less than the minimum annual local housing need figure and therefore the minimum LHN figure for Croydon is 2,302 dpa. This results in 46,040 dwellings over the 20-year plan period.

Scenario 2: Croydon Local Plan

2.17 Under the Croydon Local Plan scenario, we have used Policy SP2 which seeks to deliver 32,890 dwellings over the period 2016 to 2036. This equates to 1,644 dpa. The previous housing need calculated a housing need higher than the housing allocations identified in the Croydon Local Plan therefore this is a constrained scenario.

Scenario 3: Draft London Plan

2.18 The Draft London Plan identifies a target of 56,202 over the period 2019/20-2028/29. This equates to 2,949 dpa. This is based on an alternative assessment of capacity in the Borough including the assumptions about windfall development.

Population Growth

2.19 To input into later parts of this study, we have translated the level of household growth under each scenario into a population projection. While the population projections are an input to stage 1 of the report how the additional homes (either through step 2 and 3 or Scenario 2 or 3) are occupied still needs to be calculated.

2.20 An indication of how this should be tackled is set out in Paragraph 6 of the PPG which relates to the affordability adjustment:

“An affordability adjustment is applied as household growth on its own is insufficient as an indicator of housing demand because:

- *household formation is constrained to the supply of available properties – new households cannot form if there is nowhere for them to live; and*

- *people may want to live in an area in which they do not reside currently, for example, to be near to work, but be unable to find appropriate accommodation that they can afford.”*

2.21 In other words, if the additional homes are to be filled and to address the issues set out above then a combination of reasonable improvements to household formation and changes to migration must occur.

2.22 Our two-step process therefore firstly improves household formation rates to a level which might be reasonable based on historic trends. The second step then adjusts migration (link to underlying assumptions in the 2016 SNPP which utilises more recent data and based on the same methodology as 2014-based) to a point where household growth matches the number of homes in the scenario the additional homes are occupied.

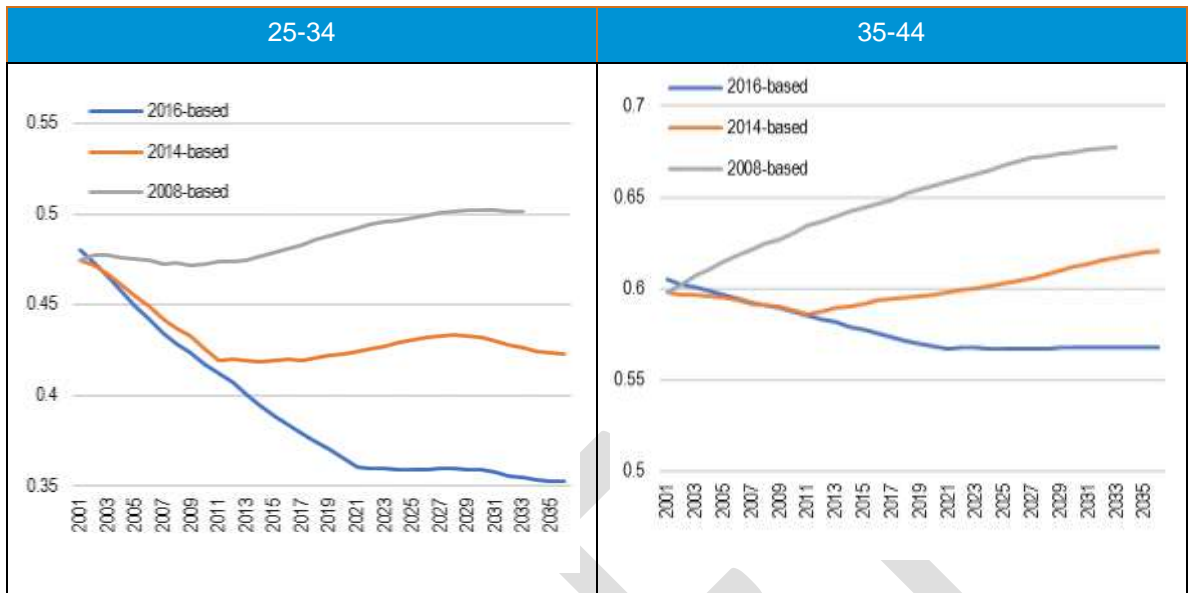
Household Formation Rates

2.23 We have first sought to establish what a reasonable improvement to household formation rates entails. The latest Households Representative Rates (HRRs) are contained in the ONS 2016-based sub-national household projections (SNHP) published in September 2018.

2.24 The 2016-based SNHP have come under some heavy criticism, this is largely because they are based only on data in the 2001-11 Census period and arguably build in the suppression of household formation experienced in that time. The criticism of the 2016-Based HRR resulted in the consultation methodology employed in this report.

2.25 The previous (2014-based) projections used a longer time-series (all Census points back to 1971) and therefore do cover a wider housing market cycle. However, while the 2014-based projections are more positive than the 2016-based projections for those aged 25-34, there is still a clear and considerable deterioration in the ability to form a household since 1991 but particularly from 2001 onwards which is projected to continue.

Figure 1: Projected Household Representative Rates by age of head of household (selected age groups) – Croydon



Source: Derived from ONS and CLG data

- 2.26 In addition, when compared to the pre-recession 2008-based HRRs both the 25-34 and 35-44 age groups are much lower. These were based on pre-recession trends and are therefore reflective of a more positive housing environment.
- 2.27 If either the 2014-based or 2016-based HRR figures are used it would be clear that the objective of the affordability adjustment would not be met as households in these age groups would still not be able to form in the way that they once did and arguably should.
- 2.28 In such circumstances, it would be reasonable to consider a further adjustment to HRR, as otherwise, residents in these younger age groups would not be able to form in the way in which they would perhaps like to or had done so historically.
- 2.29 A sensitivity test has thus been developed to model an increase in the household formation rates of the population aged 25-44. This links back to the 2014-based SNHP and can be termed a 'part-return-to-trend', where the rate of household formation sits somewhere between figures in the 2014-based projections and those in an older 2008-based version. This approach was suggested by the Local Plans Expert Group (LPEG)² although it should be noted that these assumptions are untested as no Local Authority that has examined their local plan since changes to the NPPF were made in February 2019.

Migration

² <http://lpeg.org/wp-content/uploads/2016/02/Appendices-local-plans-report-to-government.pdf> (page 23)

2.30 The changes to migration have been applied on a proportionate basis; the methodology assumes that the age/sex profile of both in- and out-migrants is the same as underpins the 2016-based SNPP with adjustments being consistently applied to both internal (domestic) and international migration. Adjustments are made to both in- and out-migration (e.g. if in-migration is increased by 1% then out-migration is reduced by 1%).

2.31 In summary, the method includes the following assumptions:

- Base population in 2017 from the latest mid-year population estimates;
- Household representative rates from the 2014-based SNHP with an adjustment for a part-return to 2008-based trends; and
- The migration profile (by age and sex) in the same proportions as the 2016-based SNPP

2.32 This changes both the overall level of growth away from the 2016-based SNPP but also changes the age structure. The higher population growth typically results in a much stronger growth in what might be considered as 'working-age' groups. This arises because ONS data shows that migrants are heavily concentrated in those age groups (along with their associated children).

2.33 The tables below show the age structure of the population projected to be consistent with the housing need associated with each scenario.

Scenario 1: Standard Method

2.34 As identified above, calculating the Standard Method results in a housing need of 2,302 dpa. The table below reports the projected population change in Croydon between 2016 and 2036 under Scenario 1. The population is forecast to increase by 56,900 or approximately 15%. This scenario forecasts the population to reach 440,200 by 2036.

Table 1: Projected population change under Scenario 1: Standard Method

	Population 2016	Population 2036	Change in population	% change
0-4	28,652	27,538	-1,114	-3.9%
5-9	27,749	27,366	-383	-1.4%
10-14	23,724	27,646	3,922	16.5%
15-19	22,801	27,244	4,443	19.5%
20-24	20,344	22,539	2,195	10.8%
25-29	27,743	27,186	-557	-2.0%
30-34	30,028	26,418	-3,610	-12.0%
35-39	29,356	27,709	-1,647	-5.6%
40-44	26,666	29,184	2,518	9.4%
45-49	27,095	31,122	4,027	14.9%
50-54	28,401	30,771	2,370	8.3%
55-59	22,417	28,236	5,819	26.0%
60-64	18,077	24,326	6,249	34.6%
65-69	15,539	22,530	6,991	45.0%
70-74	11,560	21,044	9,484	82.0%
75-79	9,216	15,716	6,500	70.5%
80-84	7,190	11,262	4,072	56.6%
85 & over	6,743	12,359	5,616	83.3%
Total	383,301	440,197	56,896	14.8%

Source: Demographic projections/SNHP

- 2.35 By 2036, older persons age groups are forecast to experience the most significant proportional growth with the 70-74 age group increasing by approximately 82%, 75-79 increasing by approximately 70% and 85 years and over group increasing by 84%.
- 2.36 Currently, the young working professional's make-up a large proportion of Croydon's population with 30-34 and 35-39 age groups the most populous age groups. However, these groups are forecast to experience lower rates of growth and indeed decline.
- 2.37 Amongst young adults, the 25-29 age group is forecast to decrease by approximately 2%, 30-34 age group is forecast to decrease by approximately 12% and 6% for the 35-39 age group. Having higher rates of housing delivery would result in higher levels of migration. However, in this particular scenario, the increase in migration only off-sets a decline in the population growth within the official population projections.

Scenario 2: Croydon Local Plan

- 2.38 The table below reports the population projections under Scenario 2, the Croydon Local Plan between 2016 and 2036. Over this period, the population is forecast to increase by an additional 30,590 people or 8%.
- 2.39 The population growth trends under this scenario tend to mirror Scenario 1. Currently, the young working professional age groups are the most populous with the 30-34 and 35-39 age groups each accounting for 8% of the total population.
- 2.40 As with Scenario 1, the number of children aged 0 to 9 and adults aged 25-39 are forecast to experience decline to 2036 under Scenario 2. Other age groups are expected to increase over the same period.

Table 2: Projected population change under Scenario 2: Croydon Local Plan

	Population 2016	Population 2036	Change in population	% change
0-4	28,652	25,065	-3,587	-12.5%
5-9	27,749	25,140	-2,609	-9.4%
10-14	23,724	25,918	2,194	9.2%
15-19	22,801	25,955	3,154	13.8%
20-24	20,344	20,931	587	2.9%
25-29	27,743	25,081	-2,662	-9.6%
30-34	30,028	23,974	-6,054	-20.2%
35-39	29,356	25,115	-4,241	-14.4%
40-44	26,666	26,755	89	0.3%
45-49	27,095	29,069	1,974	7.3%
50-54	28,401	29,276	875	3.1%
55-59	22,417	27,177	4,760	21.2%
60-64	18,077	23,547	5,470	30.3%
65-69	15,539	21,868	6,329	40.7%
70-74	11,560	20,502	8,942	77.4%
75-79	9,216	15,363	6,147	66.7%
80-84	7,190	11,048	3,858	53.7%
85 & over	6,743	12,106	5,363	79.5%
Total	383,301	413,891	30,590	8.0%

Source: Demographic projections/SNHP

- 2.41 By 2036, this trend is forecast to shift with older working professional age groups making up a high proportion of Croydon's population. For instance, by 2036, the 45-49, 50-54 and 55-59 age groups

are forecast to make up 7% of the total population of Croydon and the 25-29, 30-34 and 35-39 age groups are forecast to experience decline.

- 2.42 Over the period, the older person age groups are forecast to experience the greatest proportional growth with the 70-74 age group forecast to grow by approximately 77%, 75-79 age group forecast to increase by approximately 67% and the 85 years and over population forecast to increase by 80%. The forecast of older person population is aligned with the trends in Scenario 1.

Scenario 3: Draft London Plan

- 2.43 The table below presents the population forecasts for Scenario 3, the draft London Plan which identifies growth of 2,949 dpa. Under this scenario, the population is forecast to reach 466,061 which is approximately 22% increase over the period.
- 2.44 The forecast growth of young age groups (0-4 and 5-9) is forecast to experience a slight growth to 2036, and age groups 10-14 and 15-19 are forecast to increase by approximately 28% and 25%.

Table 3: Projected population change under Scenario 3: Draft London Plan

	Population 2016	Population 2036	Change in population	% change
0-4	28,652	29,969	1,317	4.6%
5-9	27,749	29,556	1,807	6.5%
10-14	23,724	29,345	5,621	23.7%
15-19	22,801	28,511	5,710	25.0%
20-24	20,344	24,121	3,777	18.6%
25-29	27,743	29,257	1,514	5.5%
30-34	30,028	28,820	-1,208	-4.0%
35-39	29,356	30,260	904	3.1%
40-44	26,666	31,572	4,906	18.4%
45-49	27,095	33,141	6,046	22.3%
50-54	28,401	32,241	3,840	13.5%
55-59	22,417	29,277	6,860	30.6%
60-64	18,077	25,091	7,014	38.8%
65-69	15,539	23,181	7,642	49.2%
70-74	11,560	21,576	10,016	86.6%
75-79	9,216	16,063	6,847	74.3%
80-84	7,190	11,472	4,282	59.6%
85 & over	6,743	12,608	5,865	87.0%
Total	383,301	466,061	82,760	21.6%

Source: Demographic projections/SNHP

- 2.45 This scenario shows positive growth for young adults in the 25-29 and 35-39 age groups, in contrast to Scenario 1 and Scenario 2 which showed decline. This is due to increased migration to fill these homes will be in those of a younger working age.
- 2.46 By 2036, the most populous age group is forecast to shift from the 30-34 and 35-39 age groups to the 40-44, 45-49 and 50-54 age groups through natural aging and in-migration. However, the 70-74 (86%), 75-79 (74%) and 85 years and over (87%) age groups are forecast to experience the greatest proportional growth over the period and in the case of those aged 70-74 the greatest absolute growth.

Housing Need and Population Growth: Summary Points

- The Standard Method housing need for Croydon results in 2,302 dpa based on the 2014-based household projections.
- Two other housing need scenarios were tested, looking at the housing need under the Croydon Local Plan scenario which identified a need of 1,644 dpa and 2,949 dpa under the Draft London Plan scenario.
- Using our modelled approach to population growth we have ensured that household formation rates are improved and population growth through migration is increased. Our modelling shows a growth of 14.8% in population and 28% in households over 2016 to 2036 under the Standard Method scenario.

3

4 ECONOMIC GROWTH AND HOUSING NEED

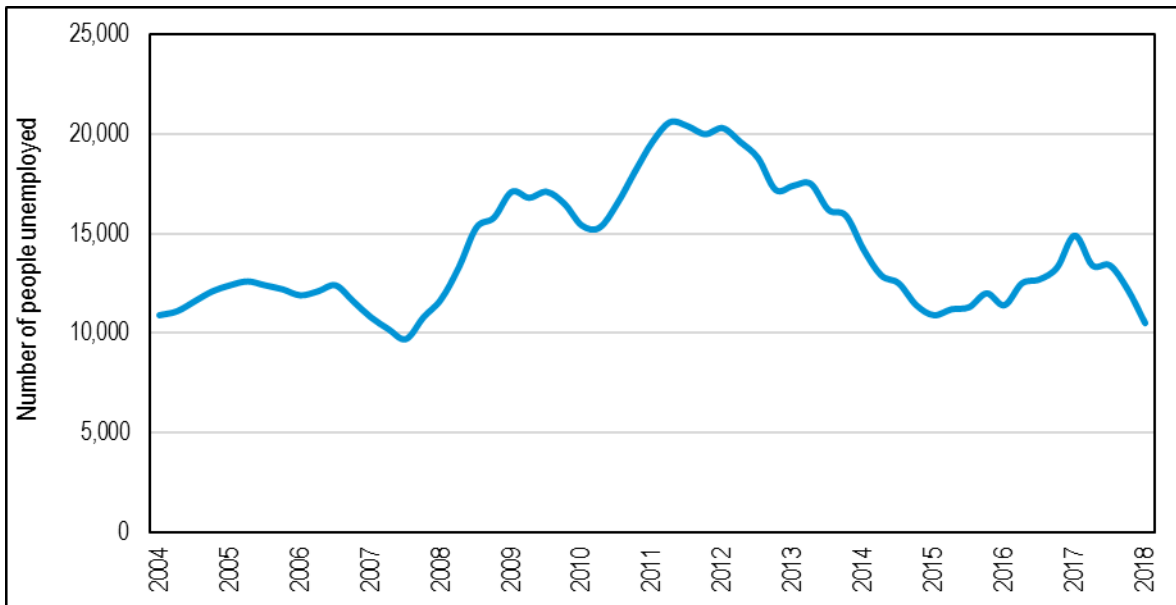
- 4.1 In this section, consideration is given to economic growth and how this may influence the level of housing need. While the standard methodology removes any consideration of economic growth within the LHN, there is still a requirement for local authorities to align their economic and housing strategies.
- 4.2 By failing to do so Local Authorities would either struggle to meet their economic growth aspirations or draw on a greater level of workforce outside the borough thus creating unsustainable commuting patterns.
- 4.3 The PPG is also clear that the standard methodology is also a minimum and that where growth strategies are in place this might entail the actual housing need being higher than the figure identified by the standard method.
- 4.4 This section of the report seeks to understand the employment level generated by the standard methodology and compares this to the most recent economic forecasts supporting the Council's strategy.

Number of Jobs Supported by the Standard Method

- 4.5 As set out in the previous chapter the three-stage approach to calculating housing need results in a total need for 2,302 dpa and a population growth of 56,896 additional people in Croydon. However, to translate this into a labour force growth and jobs growth, a series of assumptions need to be made.
- 4.6 The first step is to understand how economic activity might change and therefore what the resident labour force would be. There are several factors in relation to the economic activity including age profile, unemployment and changing pensionable ages.
- 4.7 Unemployment in Croydon was also analysed to reveal changes over time. As the figure below illustrates, the rates are somewhat in line with broader economic cycles. The level of unemployment in each area has remained similar relative to each other.
- 4.8 Unemployment in Croydon was high during the Global Financial Crisis reaching 17,000 persons at 2009, however this continued to rise in the following years. Unemployment rates peaked at 2012, reaching 20,600 people unemployed. The data assumes no further changes moving forward as current rates of unemployment are low.

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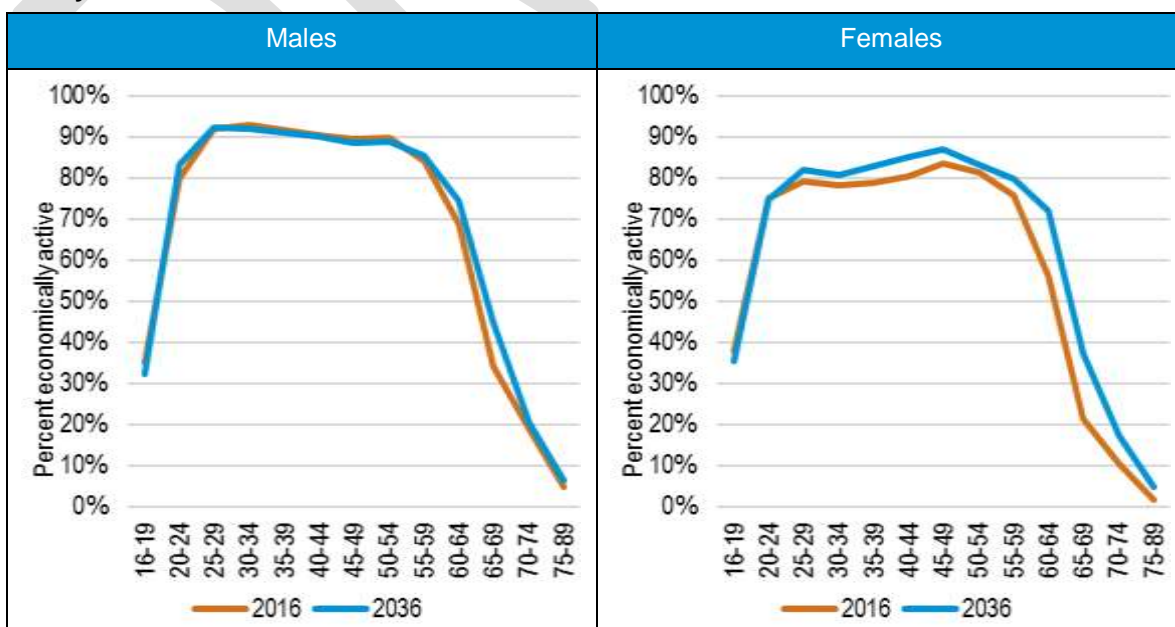
Figure 2: Number of people unemployed in Croydon (2004-2018)



Source: Annual Population Survey

4.9 We next considered how economic activity may change between 2019 and 2036. From this, we drew on from the Office of Budget Responsibility (OBR) Summer 2017 FSR but adjusted to reflect the start point and age structure in Croydon. The figures below illustrate changes to economic activity rates for both males and females.

Figure 3: Projected changes to the economic activity rate by age and sex (2016-36) – Croydon



Source: OBR and Census 2011

- 4.10 For most age groups the percentage of economically active males is forecast to continue in the same trend to 2036. However, linked to longevity and changes to the pensionable age there will be a slightly higher percent of the population that are economically active over the age of 60 in 2036. For women, the change is slightly more apparent again this is linked to more marked changes to the pensionable age.
- 4.11 Applying these assumptions to the population growth emanating from the standard methodology and the other scenarios it is possible to assess the growth in the economically active population in Croydon. This is presented in the table below, illustrating that under Scenario 1, an additional 28,375 economically active persons would be created.

Table 4: Estimated change to the economically active population (2016-2036)

	Economically active (2016)	Economically active (2036)	Change
Scenario 1: Standard Method	202,704	231,079	28,375
Scenario 2: Croydon Local Plan	202,704	216,214	13,510
Scenario 3: Draft London Plan	202,704	245,694	42,990

Source: Range of sources

Commuting Patterns

- 4.12 The table below shows the commuting ratio and is calculated as the number of people living in an area (and working) divided by the number of people working in the area (regardless of where they live).
- 4.13 A small number of the population are considered home workers (15,887). There is a high number (39,912) of people commuting into Croydon for employment in its strong, office, retail and industrial sector.
- 4.14 Perhaps as expected for a borough with good transport links to Central London the Borough also has a proportion of the population commute out of the Local Authority for employment opportunities.
- 4.15 As illustrated in the table below, Croydon is a net out-commuter which means the total number of people living and working in Croydon is 43% higher than the total number who work in the London Borough of Croydon.

Table 5: Commuting Patterns (2011)

	Croydon
Live and work in Local Authority (LA)	48,412
Home workers	15,887
No fixed workplace	17,006
In-commute	39,912
Out-commute	92,621
Total working in LA	121,217
Total living in LA (and working)	173,926
Commuting ratio	1.43

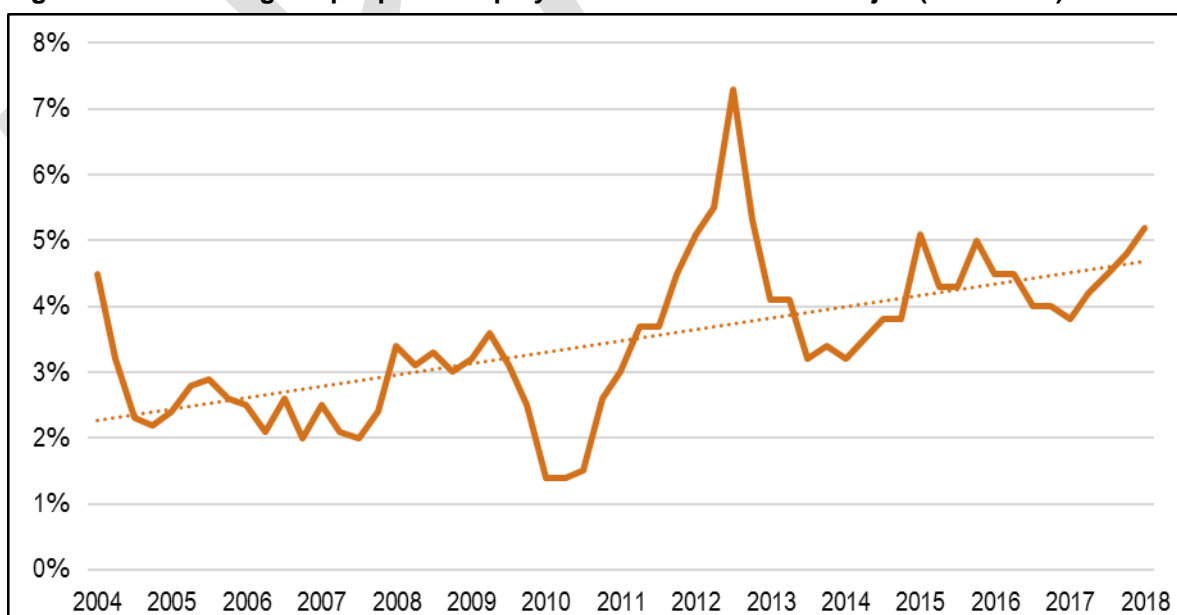
Source: Census 2011

Double-jobbing

4.16 The next stage in this analysis is to consider double jobbing. Where data is available, double jobbing has been analysed to show the percentage of people with multiple jobs at once. The figure below presents the outcome of all the people that have a second job in Croydon between 2004 and 2018.

4.17 The peak in the proportion of residents double jobbing was between 2012 and 2013, which aligns with peak of unemployment rate at this point in time. Across the period, the double jobbing average is 3.5%. This figure has been used in the analysis.

Figure 4: Percentage of people in employment who have a second job (2004-2018)



Source: Annual Population Survey

4.18 The commuting ratio is multiplied by the double-jobbing rate to get to an adjustment factor which translates economically active population to the number of jobs which could be supported in a given area. As the table below shows the standard method would support an additional 20,489 jobs over the 2016-36 period under the standard method. This would increase to 31,043 jobs under the London Plan scenario.

Table 6: Jobs supported by scenario – Croydon (2016-36)

	Total change in economically active	Allowance for net commuting	Allowance for double jobbing (= jobs supported)
Scenario 1: Standard Method	28,375	19,775	20,489
Scenario 2: Croydon Local Plan	13,510	9,416	9,756
Scenario 3: Draft London Plan	42,990	29,962	31,043

Source: Range of sources

4.19 Scenario 1, the Standard Methodology, would support a jobs growth of 1,024 additional jobs per annum over the 20-year period to 2036. This would increase to 1,552 jobs per annum under Scenario 3, the draft London Plan, and fall to a low as 488 jobs per annum under Scenario 2, the Croydon Local Plan.

Economic Growth and Housing Need: Summary Points

- We have examined the link between housing and employment in Croydon drawing on several assumptions.
- Linked to population growth and age profile in each area commuting patterns double jobbing and economic activity rates the standard method (2,302 dpa) housing need would support an increase in jobs of 20,489 jobs over the 2016-36 period.

5 AFFORDABLE HOUSING NEED

Introduction

- 5.1 Affordable housing is defined in Annex 2 of the NPPF (2019). The new definition is slightly wider than the previous NPPF (2012) definition; a series of 'affordable home ownership' options are considered to be affordable housing.
- 5.2 The Planning Practice Guidance relating to the measurement of affordable housing need was updated in February 2019, although it is similar to that set out in draft in March 2018. The PPG describes the calculation of affordable housing need as relating to *'the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market'*.
- 5.3 A methodology is set out in the PPG to look at affordable need, this is largely the same as the previous PPG method and does not really address the additional (affordable home ownership) definition other than to identify "the number of households from other tenures in need and those that cannot afford their own homes, either to rent or to own, where that is their aspiration".
- 5.4 Due to the lack of any detailed guidance the analysis below is therefore split between the current definition of affordable need and the additional definition. This section of the report below deals with the existing definition of affordable need with the following section considering the revised/expanded NPPF definition.

Affordable Housing Need (established definition)

- 5.5 The method for studying the need for affordable housing has been enshrined in Strategic Housing Market Assessment (SHMA) guidance for many years, with an established approach to look at the number of households who are unable to afford market housing (to either rent or buy). The analysis below follows the methodology and key data sources in guidance and can be summarised as:
- Current need (an estimate of the number of households who have a need now and based on a range of data modelled from local information);
 - Projected newly forming households in need (based on projections developed for this project along with an affordability test to estimate numbers unable to afford the market);
 - Existing households falling into need (based on studying the types of households who have needed to access social/affordable rented housing and based on study past lettings data);
 - These three bullet points added together provide an indication of the gross need (the current need is divided by 20 to meet the need over the 2016-36 period);

- Supply of affordable housing (an estimate of the likely number of letting that will become available from the existing social housing stock – drawing on data from CoRe³); and
- Subtracting the supply from the gross need provides an estimate of the overall (annual) need for affordable housing

5.6 Each of these stages is described below. In addition, much of the analysis requires a view about affordability to be developed. This includes looking at house prices and private rents along with estimates of local household incomes. The following sections, therefore, look at different aspects of the analysis.

Local Prices and Rents

5.7 An important part of the affordable needs model is to establish the entry-level costs of housing to buy and rent. The affordable housing needs assessment compares prices and rents with the incomes of households to establish what proportion of households can meet their needs in the market, and what proportion require support and are thus defined as having an ‘affordable housing need’.

5.8 For the purposes of establishing affordable housing need, the analysis focuses on overall housing costs (for all dwelling types and sizes). Later in the report, this information is expanded on in more detail to present a consideration of the types of affordable housing that might meet local needs. This section focuses on establishing, in numerical terms, the overall need for affordable housing.

5.9 The analysis below considers the entry-level costs of housing to both buy and rent across the Borough of Croydon. The approach has been to analyse Land Registry and Valuation Office Agency (VOA) data to establish lower quartile prices and rents – using a lower quartile figure is consistent with the PPG and reflects the entry-level point into the market.

5.10 Data from the Land Registry for the year to September 2018 presents estimated lower quartile property prices across the London Borough of Croydon by dwelling type. Across all dwelling types in Croydon, the data shows a lower quartile average price of £285,000 for all dwellings.

5.11 With reference to the table below, the estimated lower quartile average price of a flat in Croydon is £220,000. This value increases to £337,000 for a terraced and £400,000 for a semi-detached dwelling. The estimated lower quartile average price for a detached dwelling in Croydon is £569,000.

³ The continuous recording of lettings and sales in social housing in England (referred to as CoRe) is a national information source that records information on the characteristics of both private registered providers and local authority new social housing tenants and the homes they rent

Table 7: Lower quartile cost of housing to buy – year to September 2018 – Croydon

	Lower quartile price
Flat/maisonette	£220,000
Terraced	£337,000
Semi-detached	£400,000
Detached	£569,000
All dwellings	£285,000

Source: Land Registry, 2018

- 5.12 A similar analysis has been carried out for private rents using Valuation Office Agency (VOA) data – this covers a 12-month period to September 2018. For rental data, information about dwelling sizes (by bedroom) is provided rather than types.
- 5.13 The data in Table 2 below shows that the average lower quartile cost across all dwelling sizes is £900 per month. The lower quartile rental value for a room is £433 per month and increases to £675 for a studio and £850 for a one-bedroom dwelling.
- 5.14 The average lower quartile rental value of two-bedroom dwellings (£1,100) is almost on par with the rental value of three-bedroom at £1,300 per month. The rental value of four-bedroom dwellings increases substantially with the lower quartile rental average reaching £1,650 per month.

Table 8: Lower Quartile Market Rents (pcm), year to September 2018 – Croydon

	Lower Quartile rent (pcm)
Room only	£433
Studio	£675
1-bedroom	£850
2-bedrooms	£1,100
3-bedrooms	£1,300
4-bedrooms	£1,650
All properties	£900

Source: Valuation Office Agency, 2018

- 5.15 A household is considered able to afford market rented housing in cases where the rent payable would constitute no more than a particular percentage of gross income. The choice of an appropriate threshold is an important aspect of the analysis, CLG guidance (of 2007) suggested that 25% of income is a reasonable start point but also notes that a different figure could be used. It is noted that the Greater London Authority apply 40% of net income or 28% of gross household income.
- 5.16 Further, analysis of current letting practice suggests that letting agents typically work on a multiple of 40%. Government policy (through Housing Benefit payment thresholds) would also suggest a figure of 40%+ (depending on household characteristics).

- 5.17 The threshold of income to be spent on housing should be set by asking the question ‘what level of income is expected to be required for a household to be able to access market housing without the need for a subsidy (e.g. through Housing Benefit)?’ The choice of an appropriate threshold will to some degree be arbitrary and will be linked to the cost of housing rather than income.
- 5.18 Income levels are only relevant in determining the number (or proportion) of households who fail to meet the threshold. It would be feasible to find an area with very low incomes and therefore conclude that no households can afford housing, alternatively, an area with very high incomes might show the opposite output. The key here is that local income levels are not setting the threshold but are simply being used to assess how many can or can’t afford market housing.
- 5.19 Rent levels in the London Borough of Croydon are higher in comparison to those seen nationally (a lower quartile rent of £500 per month across England). This suggests that a proportion of income to be spent on housing would be at the top end of the range.
- 5.20 In the previous Croydon Strategic Housing Market Assessment (2015), a gross income threshold of 30% was used to understand the level of affordable housing need. The modelling also looked at thresholds of 25%, 35% and 40% to consider the implications of alternative thresholds.
- 5.21 The Greater London Authority consider that for a house to be affordable, it should cost no more than 28% of gross household income. However, taking into account increasing rental values since the time of the previous SHMA, it is prudent to use a figure towards the upper end of this range. We have therefore assumed a maximum 33% of gross income spent on housing. Although we recognise there will be households paying more a higher percentage than this.

Income Levels and Affordability

- 5.22 Following the analysis of local prices and rents, it is important to understand local income levels as these (along with the price/rent data) will determine levels of affordability (i.e. the ability of a household to afford to buy or rent housing in the market without the need for some sort of subsidy).
- 5.23 Data on total household income has been based on ONS modelled income estimates, with additional data from the English Housing Survey (EHS) being used to provide information about the distribution of incomes. Based on this, the estimated household income for Croydon at 2018 is presented in the table below.

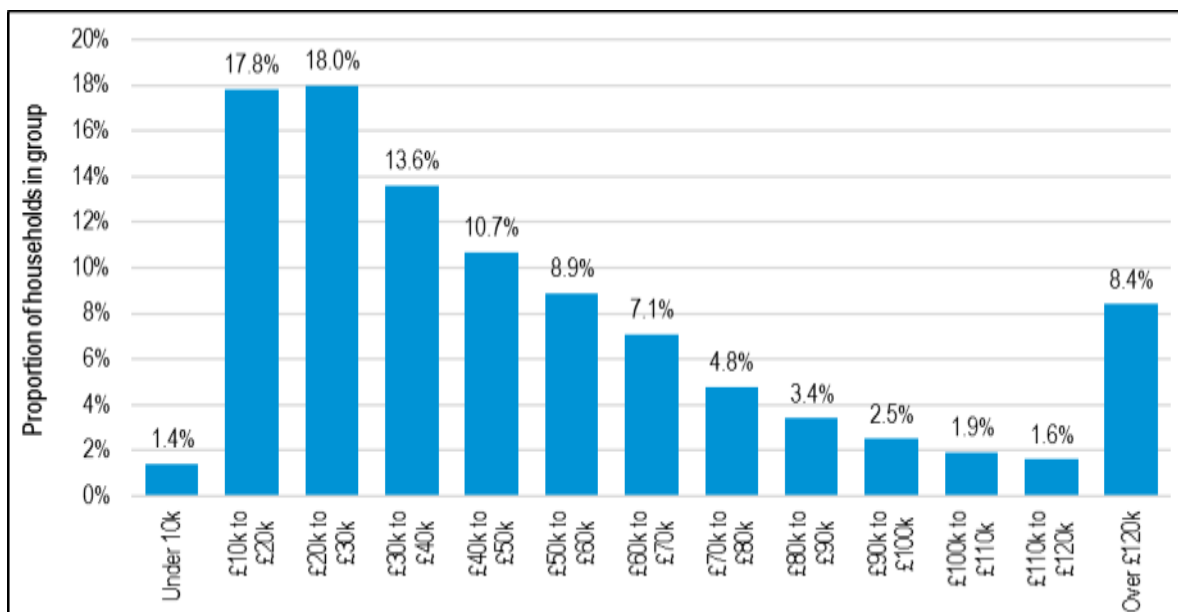
Table 9: Estimated household income in Croydon (2018)

	Mean	Median	Lower quartile
Croydon	£51,800	£39,400	£22,800

Source: Derived from a range of sources

5.24 The figure below illustrates the distribution of household income in Croydon. Currently, 18% of households in Croydon have an annual household income ranging between £20,000 to £30,000. This is followed by 17.8% of households in the £10,000 to £20,000 household income bracket.

Figure 5: Distribution of Household Income in Croydon (mid-2018 estimate)



Source: Derived from a range of sources

Net Affordable Housing Need

5.25 The table below shows the overall calculation of affordable rented housing need. This excludes supply arising from sites with planning permission (the ‘development pipeline’) to allow for a comparison with the net housing need set out in the report.

5.26 The analysis has been based on meeting affordable housing need over the period from 2019 to 2036 this means using the current need as the starting point. Whilst most of the data in the model are annual figures the current need has been divided by 16 to make an equivalent annual figure. The net need is calculated as follows:

$$\text{Net Need} = \text{Current Need} + \text{Need from Newly-Forming Households} + \text{Existing Households falling into Need} - \text{Supply of Affordable Housing}$$

5.27 The analysis in the table below calculates an overall net need of affordable rented (social/affordable) housing per annum under each scenario in Croydon over the years to 2036.

5.28 The analysis shows that total net need for social/affordable rented housing is 2,254 per annum under Scenario 1, the Standard Method. The net need is 2,435 under Scenario 3, the Draft London Plan and lowers to 2,070 per annum under Scenario 2, the Croydon Local Plan.

5.29 The current need has increased partly due to a change in methodology which takes better account of homelessness and concealed households (which are significant in Croydon) as well as general updating which sees estimates of other groups such as an increase in overcrowding. For the existing households falling into need, there is a link between the supply and this needs element as the modelling looks at those considered as in need and housed by the Council.

Table 10: Estimated Annual Level of Affordable Housing Need (rented housing)– Croydon (2019-36)

	Scenario 1: Standard Method	Scenario 2: Croydon Local Plan	Scenario 3: Draft London Plan
Current need	505	505	505
Newly forming households	1,935	1,751	2,116
Existing households falling into need	602	602	602
Total Gross Need	3042	2858	3223
Re-let Supply	788	788	788
Net Need	2,254	2,070	2,435

Source: Census (2011)/CoRe/Projection Modelling and affordability analysis

5.30 The need would also increase further had we adopted the percentage spend on housing suggested by the GLA. In either case the affordable housing need is considerable in relation to overall need and the Council should seek the maximum contribution from development as viability allows.

Comparison with Previous Assessment of Affordable Housing Need

5.31 The table below compares this analysis to the assessment undertaken in the previous Croydon SHMA (2015). As outlined above, the previous SHMA used varying scenarios of household income spent on housing. This study assumes 33% of household income is spent on housing.

Table 11: Comparing assessments of affordable housing need in Croydon

	SHMA (2013-base) 25%	SHMA (2013-base) 30%	SHMA (2013-base) 35%	SHMA (2013-base) 40%	Scenario 1 in This Study (2019-base) 33%
Current need	242	211	185	161	505
Newly forming households	2,432	2,061	1,751	1,508	1,935
Existing households falling into need	445	419	389	356	602
Total Need	3,118	2,690	2,325	2,025	2,966
Supply from existing stock	603	603	603	603	788
Net Need	2,516	2,088	1,722	1,422	2,254

Source: This study and 2015 SHMA (Table 30)

- 5.32 Overall, the comparison shows that the current need and newly forming households have increased over time, essentially increasing the number of existing households falling into need, increasing the total need. Yet the reality is that figures can vary and are specific to the point at which the analysis is undertaken.
- 5.33 Given that the net need is a function of two large numbers (gross need and gross supply), it can be seen that small changes to either can have quite a notable impact on the bottom-line needs estimate.
- 5.34 However, the key output to this comparison is that affordable housing (2,254 dpa) is still considerable in comparison to overall need (2,302 dpa). This means that the Council should continue to seek as much affordable housing as is viable possible when setting affordable housing policies.

Affordable Housing Need in the Wider Housing Need Context

- 5.35 There are a number of things that need to be remembered in interpreting the housing needs analysis. Firstly, the Basic Needs Assessment Model which has been used was designed specifically to identify whether there is a shortfall or surplus of affordable housing. It is a statutory requirement to underpin affordable housing policies.
- 5.36 The needs assessment therefore does not look at all housing needs, but specifically the needs of those who can't afford market housing (assuming no more than 33% of households' gross income

is spent on housing costs). It assumes that all households are adequately housed in a home that they can afford.

- 5.37 The needs assessment is a 'snapshot' assessment at a point in time, which is affected by the differential between housing costs and incomes at that point; as well as the existing supply of affordable housing. In the case of Croydon, the stock of affordable housing (social rented) represents about 18% of the total number of households – this is notably below the equivalent figure for London (24%). This has affected the level of affordable housing need. The shortfall of affordable housing identified is therefore to some extent affected by past investment decisions.
- 5.38 Moreover, as the Basic Needs Assessment Model is designed to identify a shortfall of genuine affordable housing, it assumes that all households in 'housing need' are housed in affordable homes (which include a provision that the home remains at an affordable price for future eligible households).
- 5.39 In reality, there are two key factors which need to be considered:
- Many households defined as in housing need may choose to spend more than a third of their gross income on housing costs or may not actively seek an affordable home; and
 - Some households defined as in housing need are accommodated in the Private Rented Sector, supported by Local Housing Allowance.
- 5.40 It is estimated that there are currently around 7,300 Local Housing Allowance claimants housed in the Private Rented Sector with many more expected to be in this sector and paying more than 30% of their income on housing but not claiming Housing Benefit (for example a single person might need to see their housing costs get up to around 45%-50% of rent before getting Housing Benefit (although other benefits such as working tax credits will kick in below this level))
- 5.41 As the level of housing need is very sensitive to differences between housing costs and incomes, changes in the difference between incomes and housing costs over time will affect the level of housing need identified.
- 5.42 Due to the role of the private rented sector in meeting housing need there is no evidence of a significant shortfall in overall housing provision to meet local housing requirements over and above that shown by the standard method and so no additional uplift is required to take account of affordability issues.
- 5.43 Given the current stock of affordable housing in the area, the funding mechanisms for delivery of new affordable housing and policies affecting sales of existing properties, it is unrealistic to assume that all households in housing need will be provided with an affordable home. It is realistic to

assume that the Private Rented Sector will continue to play an important role in meeting housing need in the short-to-medium term.

Widened Definition of Affordable Housing

- 5.44 As set out above, the previously established method to look at affordable need estimates that there is a need for around 2,254 units per annum based on the standard method – this is for subsidised housing at a cost below that to access the private rented sector (i.e. for households unable to access any form of market housing without some form of subsidy). It would be expected that this housing would be delivered primarily as social/affordable rented housing.
- 5.45 The NPPF (2018) introduced a new category of household in affordable housing need and widens the definition of affordable housing (as found in the NPPF (2018 and 2019) – Annex 2). It is considered that households falling into the definition would be suitable for Starter Homes, Discounted market sales housing, or other forms of affordable home ownership (such as shared ownership), as set out in the NPPF.
- 5.46 This section considers the level of need for these types of dwellings in Croydon. The NPPF (2019) states *“Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups.”* (NPPF (2019), paragraph 64).

Establishing a Need for Affordable Home Ownership

- 5.47 The Planning Policy Guidance of February 2019 confirms a widening definition of those to be considered as in affordable need; now including *‘households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration’*. However, there is no further guidance about how the number of such households should be measured.
- 5.48 The methodology used in this report, therefore, draws on the current standard method and includes an assessment of current needs and projected need (including housing need for newly forming and existing households falling in to need). The key difference is that in looking at affordability, an estimate of the number of households in the ‘gap’ between buying and renting is used. There is also the issue of establishing an estimate of the supply of affordable home ownership homes – this is considered separately below.
- 5.49 The first part of the analysis seeks to understand what the gap between renting and buying means in Croydon – establishing the typical incomes that might be required.

5.50 Just by looking at the relative costs of housing to buy and to rent, there will be households in the London Borough of Croydon who can currently rent but who may be unable to buy. In the year to September 2018, the ‘average’ lower quartile private rent is shown by the VOA to cost £900 a month, assuming a household spends no more than 33% of income on housing, this would equate to an income requirement of about £32,700.

5.51 For the same period, Land Registry data records a lower quartile purchase price in Croydon of about £285,000, which (assuming a 10% deposit and 4.5 times mortgage multiple) would equate to an income requirement of approaching £57,000.

5.52 Therefore, based on these costings, it is reasonable to suggest that affordable housing products would be pitched at households with an income between £32,700 (able to afford to privately rent) and £64,125, with the lower the cost addressing a greater percentage of this need.

Figure 6: Thresholds of Affordability by Tenure



Source: GL Hearn Modelling

5.53 With reference to the income distributions in the figure above, it has been estimated that of all households living in the private rented sector, around 26% already have enough income to buy a lower quartile home, with around 27% in the income bracket to afford rental housing. The remaining are estimated to have an income below which they cannot afford to rent privately.

5.54 The finding that a reasonable proportion of households (26%) in the private rented sector are likely to have an income that would allow them to buy a home is noteworthy and suggests that for many households, barriers to accessing owner-occupation are influenced by a combination of income/the

cost of housing and external factors including the lack of a deposit or difficulties obtaining a mortgage (for example due to a poor credit rating or insecure employment).

- 5.55 To study current need, an estimate of the number of household living in the private rented sector (PRS) has been established, along with the same (rent/buy gap) affordability test described above. The start point is the number of households living in private rented accommodation; as of the 2011 Census there were some 28,762 households living in the sector.
- 5.56 Data from the Survey of English Housing (EHS) suggests that since 2011, the number of households in the PRS has risen by about 26%. If the same proportion is relevant to Croydon, then the number of households in the sector would now be around 36,240.
- 5.57 Additional data from the EHS suggests that 60% of all PRS households expect to become an owner at some point (23,037 households if applied to Croydon) and of these some 25% (5,759 households) would expect this to happen in the next 2-years. The figure of 5,759 is therefore taken as the number of households potentially with a current need for affordable home ownership before any affordability testing.
- 5.58 In projecting forward, the analysis can consider newly forming households and the remaining existing households who expect to become owners further into the future. The table below reports the estimated annual level of affordable home ownership for each of the three scenarios.
- 5.59 The method has applied the same affordability test (albeit on a very slightly different income assumption for newly forming households). The table below shows a large range (as may be expected), therefore the analysis has rationalised by assuming that half of the lower quartile (LQ) supply would be able to meet the needs.
- 5.60 To clarify, the supply range maximum is based on the number of homes sold at below the lower quartile price and the supply range minimum is based on the number of homes sold at a price affordable to those just able to afford to rent privately.
- 5.61 This analysis suggests that under Scenario 1, the Standard Method, there is a gross need for around 1,453 affordable home ownership dwellings (priced for households able to afford to rent but not buy) per annum in the 2019-36 period. This is before any supply side considerations.

Table 12: Estimated Annual Level of Affordable Home Ownership – Croydon (2019-36)

	Scenario 1: Standard Method	Scenario 2: Croydon Local Plan	Scenario 3: Draft London Plan
Current need	93	93	93
Newly forming households	1,080	977	1,181
Existing households falling into need	279	279	279
Total Gross Need	1,453	1,350	1,554

Source: Census (2011)/CoRe/Projection Modelling and affordability analysis

Potential Supply of Housing to Meet the Affordable Home Ownership Need

- 5.62 As with assessing the need for affordable home ownership, it is the case that at present, the PPG does not include any suggestions about how the supply of housing to meet these needs should be calculated. The analysis below therefore provides a general discussion.
- 5.63 As noted previously, the lower quartile cost of a home to buy in the London Borough of Croydon is around £285,000. A quarter of all homes sold (noting that the data is for the year to September 2018) will be priced at or below this level.
- 5.64 However, not all of these homes will be available to all (age restricted) and some may be in a state of disrepair and are uninhabitable. We have therefore chosen to take half of these homes as a potential supply.
- 5.65 As shown in the table below, there is potentially a net annual need for up to 854 low cost home ownership dwellings under Scenario 1, the Standard Method. Scenario 3, Draft London Plan reports a net annual need of 955 and Scenario 2, Croydon Local Plan, reports a much lower figure of around 751.

Table 13: Estimated Net Need for Affordable Home Ownership (per annum)

	Scenario 1: Standard Method	Scenario 2: Croydon Local Plan	Scenario 3: Draft London Plan
Total Gross Need	1,453	1,350	1,554
Supply (LQ)	1,199	1,199	1,199
Supply (50% of LQ)	599	599	599
Net need (50% LQ supply)	854	751	955

Source: Derived from Census (2011)/Projection Modelling/Land Registry and affordability analysis

- 5.66 Another way to look at the supply is to estimate how much housing is available at an equivalent price (in income terms) to access the private rented sector. If the rental income figure of £32,700 per calendar month is worked backwards into an equivalent purchase price, then this gives an

affordable price to buy of about £145,300 (calculated as $((4,200) \times 4) \div 0.9$). There is a considerably lower supply at homes below this price and thus the net need increases to 1,267 under the standard method scenario.

Table 14: Alternative Estimated Net Need for Affordable Home Ownership (per annum)

	Scenario 1: Standard Method	Scenario 2: Croydon Local Plan	Scenario 3: Draft London Plan
Total Gross Need	1,453	1,350	1,554
Supply (equivalent cost of rent)	186	186	186
Net need	1,267	1,164	1,368

Source: Derived from Census (2011)/Projection Modelling/Land Registry and affordability analysis

- 5.67 These figures should be used to demonstrate the scale of potential supply for households in the rent/buy gap and it should be noted that this stock is not necessarily available to those households in need (i.e. market housing is not allocated and so theoretically all the sales could go to households who could afford a more expensive home or potentially to investment buyers).
- 5.68 There may also be issues with the quality of the stock at the very bottom end of the market. That said, there is clearly a reasonable level of stock that is potentially affordable to those households falling into the Government's revised definition of affordable housing need.

Implications of the Analysis

- 5.69 Given the analysis above, it would be reasonable to conclude that there is potential need to provide housing under the new definition of 'affordable home ownership'. Whilst there are some households in the gap between renting and buying, there is also a potential supply of homes within the existing stock that can contribute to this need.
- 5.70 However, it does seem that there are many households in Croydon who are being excluded from the owner-occupied sector. This can be seen by analysis of tenure change, which saw the number of households living in private rented accommodation in Croydon increasing by 80% between 2001 and 2011 (with the likelihood that there have been further increases since). Over the same period, the number of owners with a mortgage dropped by around 16%.
- 5.71 As part of a package of low-cost home ownership products, Council should focus on Shared Ownership housing in light of the reduced deposits and the subsidised rent provided. Such a scheme could provide an opportunity for people to eventually achieve 100% equity in their home.
- 5.72 Additionally, the Council could consider products that offer a straight discount on OMV as part of its package of measures, if these would meet the affordability criteria of households in the gap

between renting and buying. The Council could also seek a percentage of low-cost home ownership housing to be made available with some initial upfront capital payment (such as a deposit contribution).

- 5.73 Such a payment could cover the deposit and other initial costs and would potentially need to be protected in some way so that the money is not lost if a household chooses to sell their property (i.e. to ensure that any subsidy is held in perpetuity).
- 5.74 Schemes such as Help-to-Buy could also form part of such a package. This would still be targeted at the same group of households (likely to mainly be those currently privately renting but who would like to buy). If this could be achieved, then it may be reasonable to seek 10% of new homes to fall into the affordable home ownership category. This is based on the NPPF which seeks the 10% figure, although this is in conflict with the Draft London Plan, which seeks 15% of new homes falling into the affordable home ownership category. There is a difference here and while it may increase the viability of schemes going above 10%, it will mean less of the more acute need will be addressed. This will be for the Council to decide the most appropriate way forward.
- 5.75 If the Council does seek to provide 10% of housing as affordable home ownership, then it is likely that shared ownership is the most appropriate option. This is due to the lower deposit requirements and lower overall costs (given that the rent would also be subsidised).
- 5.76 In promoting shared ownership, the Council should consider the equity share and the overall cost once the rent and any service charges are included – this will be necessary to ensure that such homes are meeting the target group of households (i.e. those with an income in the gap between renting and buying).
- 5.77 It may be that equity shares as low as 25% would be needed to make shared ownership affordable (although this does have the additional advantage of a lower deposit), given that such homes would need to use Open Market Value as a start point. This is something that should be monitored on a case by case basis and could vary by location and property type/size.
- 5.78 The evidence suggests there is no basis to increase the provision of affordable home ownership above the 10% figure currently suggested in the NPPF, and that in addition to 10% of affordable home ownership (or some alternative measure such as capital payments), the Council should be seeking to provide additional social/affordable rented housing. Such housing is cheaper than that available in the open market and can be accessed by many more households (some of whom may be supported by benefit payments).
- 5.79 Overall therefore, it seems reasonable to suggest that the Council could consider seeking 10% of all housing (on larger sites) to be affordable home ownership (as set out in the NPPF), although

consideration will need to be given to the tenure of such housing, levels of discounts and other options (such as relating to deposits).

- 5.80 However, given that the main analysis of affordable need also showed a notably higher level of need (particularly when compared to the bottom end of the low-cost home ownership range), and one involving households who cannot afford anything in the market without subsidy, it is not considered that there is a strong basis to increase the provision of affordable home ownership above the 10% figure. Yet, in saying this, the DLP identifies 15% for the provision of affordable home ownership. Essentially, it is the decision of Council to increase the provision of affordable home ownership.
- 5.81 It should also be noted that the finding of a 'need' for affordable home ownership does not have any impact on the overall need for housing. As is clear from both the NPPF and PPG, the additional group of households in need is simply a case of seeking to move households from one tenure to another (in this case from private renting to owner-occupation); there is therefore no net change in the total number of households, or the number of homes required.

How Much Should Affordable Home Ownership Homes Cost?

- 5.82 The analysis and discussion above suggest that there are several households likely to fall under the new PPG definition of affordable housing need (i.e. in the gap between renting and buying) but that the potential supply of housing to buy makes it difficult to fully quantify this need. However, given the NPPF, it seems likely that the Council will need to seek 10% of additional homes on larger sites as some form of home ownership.
- 5.83 Forms of housing such as Starter Homes, Shared Ownership and discounted market sale are considered to be appropriate forms of affordable home ownership. Another option is providing support for deposits. It will be important for the Council to ensure that such homes are sold at a price that is genuinely affordable for the intended target group.
- 5.84 On this basis, it is worth discussing what sort of costs affordable home ownership properties should be sold for. The Annex 2 (NPPF) definitions suggest that such housing should be made available at a discount of at least 20% from Open Market Value (OMV).
- 5.85 The problem with having a percentage discount is that it is possible in some locations or types of property that such a discount still means that housing is more expensive than that typically available in the open market.
- 5.86 The preferred approach in this report is to set out a series of affordable purchase costs for different sizes of accommodation. These are based on equalising the private rent figures into a house price

so that the sale price will meet the needs of all households in the gap between buying and renting. Setting higher prices would mean that such housing would not be available to many households for whom the Government is seeking to provide an 'affordable' option.

5.87 The table below therefore sets out a suggested purchase price for affordable home ownership in Croydon. As noted, the figures are based on trying to roughly equate a sale price with an equivalent access point to the private rental market.

Table 15: Affordable home ownership prices –2018 base

	1-bedroom	2-bedroom	3-bedroom	4+-bedroom
Lower limit	£153,000	£198,000	£234,000	£297,000
Upper limit	£215,000	£287,000	£385,000	£500,000

Source: derived from VOA data and Land Registry data

5.88 This shows the lower limit of a 1-bedroom at an 'affordable' price of about £153,000 and rising to an upper limit of £215,000. This increase to £297,000 as a lower limit cost of £297,000 for 4-bedroom and an upper limit of £500,000. These figures can be monitored and updated every six months by reference to VOA data.

5.89 If the Council do seek for some additional housing to be in the affordable home ownership sector, it is additionally recommended that they set up a register of people interested in these products (in a similar way to the current Housing Register). This will enable any properties to be 'allocated' to households whose circumstances best meet the property on offer.

Affordable Housing Need: Key Messages

- Analysis has been undertaken to estimate the need for affordable housing in the period to 2036. The analysis is split between a 'traditional' need (which is mainly for social/affordable rented accommodation) and is based on households unable to buy or rent in the market and the 'additional' category of need introduced by the revised NPPF/PPG (which includes housing for those who can afford to rent privately but cannot afford to buy a home). This is dealt with in the following section.
- The analysis has taken account of local housing costs (to both buy and rent) along with estimates of household income. Additionally, consideration is given to household projections and estimates of the supply of social/affordable rented housing through relets.
- Under the Standard Method, the analysis suggests a net need for 2,254 of affordable rented housing per annum to be provided over the period to 2036. This figure is higher than estimated in the previous SHMA, although these are not on a like for like basis. However, the Council is justified in seeking to secure as much additional affordable housing as viably possible.
- Overall, the analysis identifies a notable need for affordable housing, and the provision of new affordable housing continues to be an important and pressing issue in the Borough.
- When looking at the need for affordable home ownership products (i.e. the expanded definition of affordable housing in the NPPF) there are several households likely to be able to afford to rent privately but who cannot afford to buy a suitable home. However, there is also a potential supply of homes within the existing stock that can contribute to this need.
- It is therefore difficult to robustly identify an overall need for affordable home ownership products. Under Scenario 1, the Standard Method, our analysis suggests that the gross need is 1,453.
- If the Council does seek to provide 10% of housing as affordable home ownership, then it is suggested that shared ownership is the most appropriate option. Where other forms of affordable home ownership are provided (e.g. Starter Homes or discounted market), it is recommended that the Council considers setting prices at a level which (in income terms) are equivalent to the levels needed to access private rented housing. These are set out below.

	1-bedroom	2-bedroom	3-bedroom	4+-bedroom
Lower limit	£153,000	£198,000	£234,000	£297,000
Upper limit	£215,000	£287,000	£385,000	£500,000

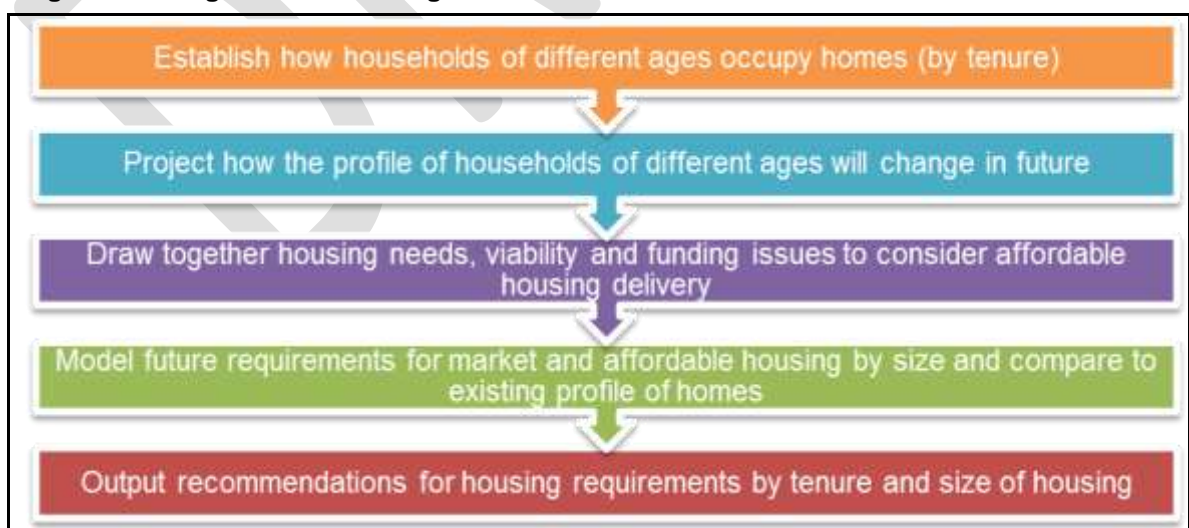
- This would ensure that households targeted by the new definition potentially afford housing - this might mean greater than 20% discounts from Open Market Value for some types/sizes of homes in some locations.
- Overall, the evidence does not show any strong basis to increase the provision of affordable home ownership above the 10% figure currently suggested in the NPPF.
- It does, however, need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided.

6 HOUSING MIX

Introduction

- 6.1 There are a range of factors which influence housing demand. These factors play out at different spatial scales and influence both the level of housing demand (in terms of aggregate household growth) and the nature of demand for different types, tenures, and sizes of homes. It is important to understand that the housing market is influenced by macro-economic factors, as well as the housing market conditions at a regional and local level.
- 6.2 This section assesses the need for different sizes of homes in the future, modelling the implications of demographic drivers on need/demand for different sizes of homes in different tenures. The assessment is intended to provide an understanding of the implications of demographic dynamics on need and demand for different sizes of homes.
- 6.3 The analysis in this section seeks to use the information available about the size and structure of the population and household structures in Croydon. This informs the consideration of what impact this may have on the sizes of housing required in the future.
- 6.4 The figure below describes the broad methodology employed in the housing market model which is used to consider the need for different sizes of market and affordable homes. Data is drawn from a range of sources including the 2011 Census and demographic projections.

Figure 7: Stages in the Housing Market Model



- 6.5 It should be noted that the current stock of housing (by size) can have a notable impact on the outputs of the modelling. The table below shows a comparison of the size profile of accommodation

in Croydon, London and England in three broad tenure groups as of 2011. Although it should be noted that Croydon has seen a high amount of smaller flatted stock being delivered though permitted development.

- 6.6 For point of reference, the methodology used in the London SHMA uses 2016 based household projections divided into eight household types, but a more detailed classification of 17 household types was created in the SHMA for the housing requirements analysis.
- 6.7 This classification was derived by applying each detailed type's share of the total in its 'parent' category from the 2013 round of GLA demographic projection to each of the eight parent categories in the 2016-based projections.
- 6.8 As the table shows Croydon has a relatively high supply of 3-bedroom houses in the London context given the nature of the local authority area hosting larger homes on the edge of the city core. The net annualised requirement for new homes in London (2016-2041) identified in the London SHMA found 14% of total new dwellings to be 3-bedrooms.

Table 16: Number of bedrooms by tenure and a range of areas

		Croydon	London	England
Overall	1-bedroom	17%	22%	12%
	2-bedrooms	29%	32%	28%
	3-bedrooms	37%	31%	41%
	4+-bedrooms	17%	15%	19%
	Total	100%	100%	100%
Owner-occupied	1-bedroom	7%	4%	10%
	2-bedrooms	24%	23%	27%
	3-bedrooms	45%	48%	41%
	4+-bedrooms	24%	25%	23%
	Total	100%	100%	100%
Social rented	1-bedroom	29%	31%	35%
	2-bedrooms	36%	34%	36%
	3-bedrooms	30%	31%	24%
	4+-bedrooms	5%	4%	5%
	Total	100%	100%	100%
Private rented	1-bedroom	33%	23%	33%
	2-bedrooms	39%	39%	37%
	3-bedrooms	21%	28%	20%
	4+-bedrooms	7%	10%	10%
	Total	100%	100%	100%

Source: Census 2011

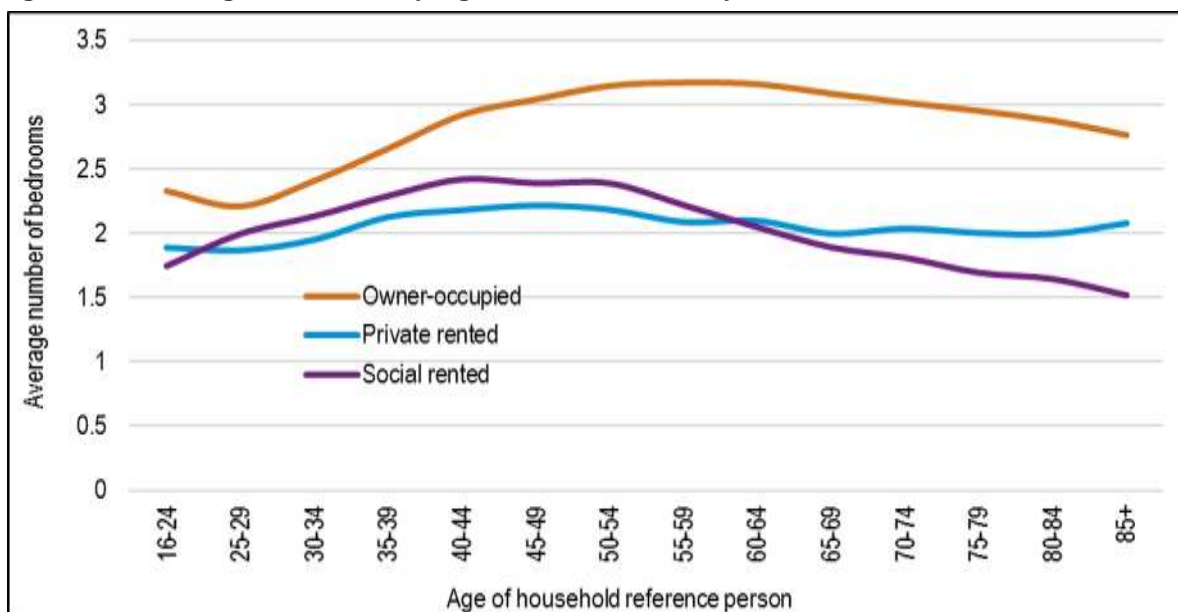
- 6.9 The table above also identifies that the profile of housing in Croydon to that seen in London and England. The private rented sector has a significantly higher proportion of 1-bedroom dwellings at 33% compared to London (23%), however on par with the national proportion (33%).
- 6.10 Croydon also has a higher proportion (7%) of 1-bedroom dwellings in the owner-occupier sector compared to London (4%), however the proportion of larger dwellings is lower than London.
- 6.11 Croydon has relatively few 1-bedroom dwellings in the social rented sector, yet slightly higher proportion of 2-bedroom social rented dwellings (36%) compared to London (34%) and more aligned with the national trend.

Understanding how Households Occupy Homes

- 6.12 Whilst the demographic projections provide a good indication of how the population and household structure will develop, it is not a simple task to convert the net increase in the number of households into a suggested profile for additional housing to be provided.
- 6.13 The main reason for this is that in the market sector households can buy or rent any size of property (subject to what they can afford) and therefore knowledge of the profile of households in an area does not directly transfer into the sizes of property to be provided.
- 6.14 The size of housing which households occupy relates more to their wealth and age than the number of people which they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a four-bedroom home if they can afford it and hence projecting an increase in single person households does not automatically translate into a need for smaller units.
- 6.15 This issue is less relevant in the affordable sector (particularly since the introduction of the social sector size criteria) although there will still be some level of under-occupation moving forward regarding older persons and working households who may be able to under-occupy housing.
- 6.16 The approach used is to interrogate information derived in the projections about the number of household reference persons (HRPs) in each age group and apply this to the profile of housing within these groups. The data for this analysis has been formed from a commissioned table by ONS (Table CT0621 which provides relevant data for all local authorities in England and Wales from the 2011 Census).
- 6.17 The figure below shows an estimate of how the average number of bedrooms varies by different ages of HRP and broad tenure group. In the owner-occupied sector, the average size of accommodation rises over time to typically reach a peak around the age of 55-59. After this peak, the average dwelling size decreases as some households downsize as they get older.

6.18 The social and private rented sector sees a different pattern, peaking in earlier ages at 40-44 for the social rented sector and 45-49 for the private rented sector. Notably, the average number of bedrooms in the private and social rented sectors are smaller compared to the owner-occupier sector.

Figure 8: Average Bedrooms by Age and Tenure in Croydon



Source: 2011 Census

6.19 These outputs have been segmented into three broad categories including market housing, owner-occupier, private rented and affordable (rented) housing.

6.20 Market housing follows the occupancy profiles in the owner-occupied sector, affordable home ownership is taken to follow the occupancy profile in the private rented sector (this is seen as reasonable as the Government's desired growth in home ownership looks to be largely driven by a wish to see households move out of private renting) and affordable (rented) housing is taken to follow the occupancy profile in the social rented sector. The affordable sector in the analysis to follow includes affordable rented housing.

6.21 These are applied to the following projected change in age groups, with most of the absolute growth in households headed by someone in the older age groups (aged 65 and over). Although those in the younger age categories are expected to see the stronger percentage growth. The tables below present the projected change in households by age of household reference person under each scenario.

6.22 Under Scenario 1, the Standard Method, households are forecast to increase by approximately 28% over the period. The greatest proportional growth is forecast to occur in the 70-74 age group

where growth in this household will increase by 7,183 (approximately 93%). The older age group growth will almost entirely to be due to households in Croydon ageing as migration from these older age groups tends to be quite low.

Table 17: Projected change in households by age of household reference person – Scenario 1: Standard Method

	Households 2016	Households 2036	Change in households	% change
16-24	5,287	6,144	856	16.2%
25-29	9,552	9,975	423	4.4%
30-34	14,595	14,533	-62	-0.4%
35-39	16,639	17,414	774	4.7%
40-44	16,431	19,224	2,793	17.0%
45-49	16,358	19,750	3,392	20.7%
50-54	17,641	19,745	2,104	11.9%
55-59	14,310	18,982	4,673	32.7%
60-64	11,246	16,283	5,037	44.8%
65-69	10,071	15,529	5,458	54.2%
70-74	7,684	14,868	7,183	93.5%
75-79	6,416	10,908	4,492	70.0%
80-84	5,468	8,310	2,841	52.0%
85 & over	4,825	8,745	3,920	81.2%
Total	156,524	200,410	43,886	28.0%

Source: Demographic projections

- 6.23 Under Scenario 2, the Croydon Local Plan, households are forecast to increase by approximately 21% over the period. The greatest proportional growth is forecast to occur in the 70-74 age group where growth in this household will increase by 6,787 (approximately 88%).

Table 18: Projected change in households by age of household reference person – Scenario 2: Croydon Local Plan

	Households 2016	Households 2036	Change in households	% change
16-24	5,287	5,739	451	8.5%
25-29	9,552	9,208	-344	-3.6%
30-34	14,595	13,200	-1,394	-9.6%
35-39	16,639	15,797	-842	-5.1%
40-44	16,431	17,614	1,183	7.2%
45-49	16,358	18,402	2,045	12.5%
50-54	17,641	18,728	1,088	6.2%
55-59	14,310	18,226	3,916	27.4%
60-64	11,246	15,731	4,485	39.9%
65-69	10,071	15,052	4,981	49.5%
70-74	7,684	14,471	6,787	88.3%
75-79	6,416	10,659	4,243	66.1%
80-84	5,468	8,151	2,682	49.1%
85 & over	4,825	8,569	3,744	77.6%
Total	156,524	189,550	33,026	21.1%

Source: Demographic projections

- 6.24 Under Scenario 3, the Draft London Plan, households are forecast to increase by approximately 35% over the period. The greatest proportional growth is forecast to occur in the 70-74 age group where growth in this household will increase by 7,573 (approximately 99%).

Table 19: Projected change in households by age of household reference person – Scenario 3: Draft London Plan

	Households 2016	Households 2036	Change in households	% change
16-24	5,287	6,542	1,255	23.7%
25-29	9,552	10,730	1,177	12.3%
30-34	14,595	15,843	1,248	8.6%
35-39	16,639	19,003	2,364	14.2%
40-44	16,431	20,807	4,376	26.6%
45-49	16,358	21,075	4,717	28.8%
50-54	17,641	20,744	3,104	17.6%
55-59	14,310	19,726	5,416	37.8%
60-64	11,246	16,825	5,579	49.6%
65-69	10,071	15,999	5,927	58.9%
70-74	7,684	15,257	7,573	98.6%
75-79	6,416	11,153	4,737	73.8%
80-84	5,468	8,466	2,998	54.8%
85 & over	4,825	8,918	4,093	84.8%
Total	156,524	211,089	54,565	34.9%

Source: Demographic projections

- 6.25 The analysis below also looks at projected changes to households by household type for each scenario.
- 6.26 The analysis for Scenario 1 is based on Stage 1 of the Standard Method household representative rates in the 2014-based household projections (with or without a part-return to trend HRR analysis). Stage 1 figures are used as these are the main figures driving the projections. The projections do also contain Stage 2 figures which provide an indication of household types.
- 6.27 The Scenario 1 analysis therefore looks at applying the Stage 2 figures to projections developed. As Stage 1 and 2 projections are to some extent independent from each other it will be noted that projected household growth does differ slightly (albeit by a modest amount).
- 6.28 We have examined growth in a range of household typologies with three categories for dependent children depending on the number of children. The findings give an indication of the number of family households as required by NPPF. Unfortunately, the CLG projections no longer look at projecting lone parent households separately from couples.
- 6.29 The table below shows the change in households under Scenario 1, the data shows relatively strong growth across all households, except for couple (aged under 65) households which is forecast to decline by -17%. Yet, couples (aged 65 years and over) households are forecast to increase by approximately 80%. This is linked to life expectancy improvements.

Table 20: Change in household types in Croydon 2016-36 – Scenario 1: Standard Method

	2016	2036	Change	% change
One-person household (aged 65 and over)	16,158	24,283	8,125	50.3%
One-person household (aged under 65)	29,242	30,936	1,694	5.8%
Couple (aged 65 and over)	11,274	20,249	8,975	79.6%
Couple (aged under 65)	16,096	13,338	-2,759	-17.1%
A couple and one or more other adults: No dependent children	14,068	22,692	8,624	61.3%
Households with one dependent child	26,240	32,387	6,147	23.4%
Households with two dependent children	18,602	19,531	929	5.0%
Households with three dependent children	9,343	10,602	1,259	13.5%
Other households	15,501	26,393	10,892	70.3%
Total	156,524	200,410	43,886	28.0%
Total households with dependent children	54,185	62,520	8,335	15.4%

Source: Demographic projections

- 6.30 Total households with dependent children are forecast to increase by approximately 15% over the period. Other households are forecast to experience the greatest proportional growth increasing by approximately 70% over the period. This will primarily be attributed to the growth of HMO, suggesting there will be growing demand in the market sector for slightly smaller profile of housing.
- 6.31 Under Scenario 2, the Croydon Local Plan, total households are forecast to increase by 7% over the period. There is relatively good growth across all household types, however one-person households (aged under 65), couple households (aged under 65) and households with two dependent children are forecast to decline.
- 6.32 The trend continues for the growth of older persons households with couple households (aged 65 and over) to experience the greatest proportional growth (approximately 75%) over the period. Linked to this is the growth of a couple and one or more other adults: No dependent children households which are forecast to increase by approximately 55% over the period.
- 6.33 Total households with dependent children are forecast to grow only slightly over the period, increasing by 7%. Other households are forecast to increase also increase under this scenario, growing by approximately 62% to 2036. Again, this will likely include a rise of HMO and all student households.

Table 21: Change in household types in Croydon 2016-36 – Scenario 2: Local Plan

	2016	2036	Change	% change
One-person household (aged 65 and over)	16,158	23,605	7,447	46.1%
One-person household (aged under 65)	29,242	28,973	-269	-0.9%
Couple (aged 65 and over)	11,274	19,721	8,446	74.9%
Couple (aged under 65)	16,096	12,440	-3,656	-22.7%
A couple and one or more other adults: No dependent children	14,068	21,750	7,682	54.6%
Households with one dependent child	26,240	30,097	3,858	14.7%
Households with two dependent children	18,602	18,111	-491	-2.6%
Households with three dependent children	9,343	9,791	448	4.8%
Other households	15,501	25,061	9,561	61.7%
Total	156,524	189,550	33,026	21.1%
Total households with dependent children	54,185	57,999	3,815	7.0%

Source: Demographic projections

- 6.34 Scenario 3, the Draft London Plan, shows trends are similar to the other scenarios with substantial increase in older person's households (couples aged 65 and over) the rise of other households. One-person households are forecast to grow substantially over the period.

Table 22: Change in household types in Croydon 2016-36 – Scenario 3: Draft London Plan

	2016	2036	Change	% change
One-person household (aged 65 and over)	16,158	24,946	8,788	54.4%
One-person household (aged under 65)	29,242	32,868	3,626	12.4%
Couple (aged 65 and over)	11,274	20,765	9,491	84.2%
Couple (aged under 65)	16,096	14,221	-1,876	-11.7%
A couple and one or more other adults: No dependent children	14,068	23,617	9,549	67.9%
Households with one dependent child	26,240	34,641	8,401	32.0%
Households with two dependent children	18,602	20,929	2,327	12.5%
Households with three dependent children	9,343	11,401	2,057	22.0%
Other households	15,501	27,701	12,201	78.7%
Total	156,524	211,089	54,565	34.9%
Total households with dependent children	54,185	66,971	12,786	23.6%

Source: Demographic projections

Mix of housing

- 6.35 This is linked to the housing need identified under each scenario. It should be noted that these projections will not necessarily be translated into policy but have been used to indicate the likely need for different sizes of homes moving forward.

6.36 It is necessary on this basis to make some judgement for modelling purposes on what proportion of net completions might be of market and affordable housing. To confirm, for **modelling purposes only**, it has been assumed that the following proportions of different tenures will be provided moving forward:

- 60% market
- 10% affordable home ownership
- 30% social/affordable rented

6.37 It should be stressed that these figures are not policy targets. Policy targets for affordable housing on new development schemes in some cases are above this, but not all sites deliver policy-compliant affordable housing provision, whilst some delivery is on sites below affordable housing policy thresholds.

6.38 Equally, some housing development is brought forward by Registered Providers and local authorities and may deliver higher proportions of affordable housing than in current policy. The figures used are not a policy position and have been applied simply for the purposes of providing outputs from the modelling process.

6.39 There are a range of factors which can influence demand for market housing in different locations. The focus of this analysis is on considering long-term needs, where changing demographics are expected to be a key influence. It uses a demographic-driven approach to quantify demand for different sizes of properties over the residual 16-year period to 2035.

Key Findings and Recommended Mix

6.40 The tables below provide the output of the modelling by size of home by tenure under each scenario in both the market and affordable sectors under the modelling exercise. This is broadly based on historic occupancy profiles and is not a recommended policy mix.

6.41 When concluding on the most appropriate mix of housing for the Borough this should be used as a starting point but should be brought together with other information as well as contextual information and potentially even political ambition. For example, if affordability worsens and more people may be forced to buy smaller homes. Smaller homes may also become more commonplace as a result of the scarcity of land driving densities.

6.42 In the table below, Scenario 1, the Standard Method, the analysis shows the market is skewed towards larger houses (49% for 3-bedrooms). The affordable housing (rented) sector is more heavily skewed towards smaller dwellings, which is a similar trend for affordable home ownership. This reflects the change in older age group households and the need emerging from these groups aging and not downsizing and no family sized houses becoming available on the market.

Table 23: Mix of housing by size and tenure – Scenario 1: Standard Method

	1-bedroom	2-bedrooms	3-bedrooms	4+ -bedrooms
Market	5%	21%	49%	25%
Affordable home ownership	34%	35%	24%	8%
Affordable housing (rented)	37%	30%	28%	5%

Source: Housing Market Model

- 6.43 The housing mix under Scenario 2 again shows the market sector heavily skewed towards 3-bedroom products with affordable home ownership and affordable rented housing towards smaller dwellings.

Table 24: Mix of housing by size and tenure – Scenario 2: Croydon Local Plan

	1-bedroom	2-bedrooms	3-bedrooms	4+ -bedrooms
Market	4%	19%	51%	26%
Affordable home ownership	35%	33%	25%	8%
Affordable housing (rented)	40%	28%	27%	4%

Source: Housing Market Model

- 6.44 Scenario 3, the Draft London Plan results in a similar pattern with affordable home ownership and affordable rented housing skewed towards smaller dwellings and market sector towards 3 and 4 bedrooms.

Table 25: Mix of housing by size and tenure – Scenario 3: Draft London Plan

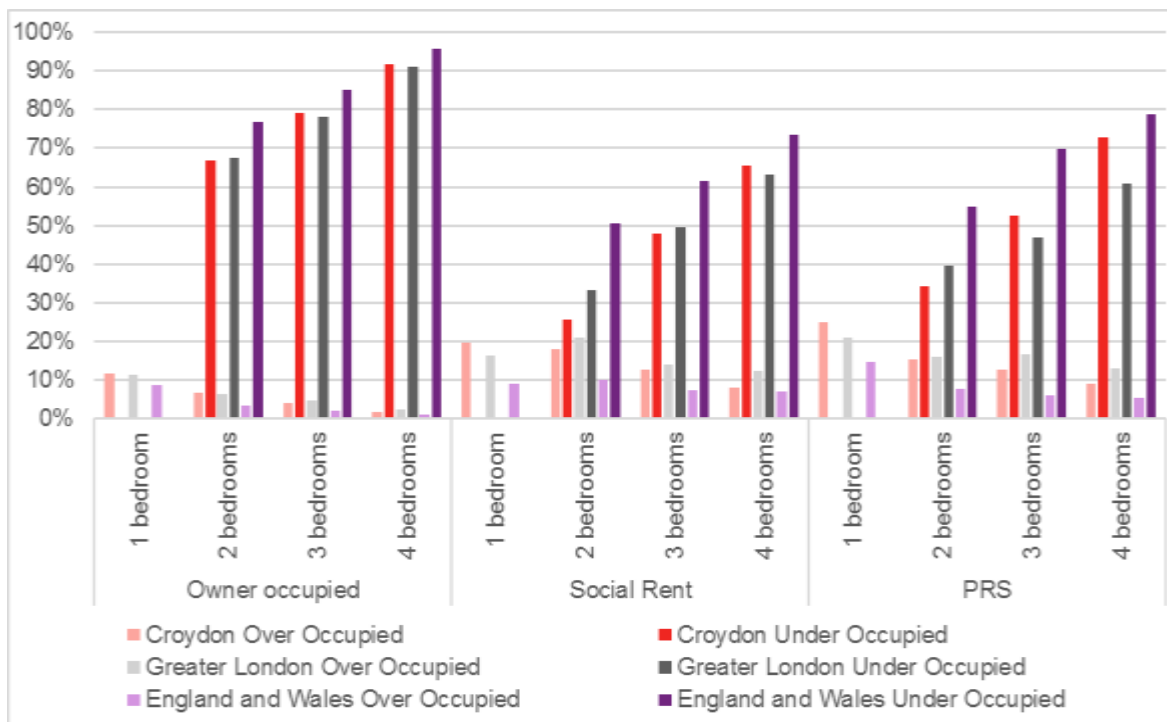
	1-bedroom	2-bedrooms	3-bedrooms	4+ -bedrooms
Market	6%	21%	48%	25%
Affordable home ownership	34%	36%	23%	8%
Affordable housing (rented)	35%	31%	28%	5%

Source: Housing Market Model

- 6.45 As mentioned previously whilst the output of the modelling provides estimates of the proportion of homes of different sizes that are needed, there are a range of factors which should be considered in setting policies for provision.
- 6.46 This is particularly the case in the affordable sector where there are typically issues around the demand for and turnover of one-bedroom homes (as well as allocations to older person households) – e.g. one bedroom homes provide limited flexibility for households (e.g. a couple household expecting to start a family) and as a result can see relatively high levels of turnover – therefore, it may not be appropriate to provide as much one-bedroom stock as is suggested by the modelling exercise.

- 6.47 At the other end of the scale, conclusions also need to consider that the stock of four-bedroom affordable housing is very limited and tends to have a very low turnover. As a result, whilst the number of households coming forward for four or more-bedroom homes is typically quite small the ability for these needs to be met is even more limited. There are also localised issues about the stock of different sizes of homes which need to be considered in conclusions (the relative lack of 2-bedroom affordable accommodation).
- 6.48 For these reasons, it is suggested in converting the long-term modelled outputs into a profile of housing to be provided (in the affordable sector) that the proportion of one-bedroom homes required is reduced slightly from these outputs with a commensurate increase in four or more-bedroom homes also being appropriate.
- 6.48 In drawing up a policy the Council may also be mindful of the recent supply of stock which has been heavily skewed towards 1- and 2-bedroom homes. While this supply has readily been taken up by younger households it perhaps should be tempered to ensure there is a supply of larger home when they start a family.
- 6.48 This could be achieved in a number of ways including making policy which seeks more 3+ bedroom homes and/or a policy which encourages better use of the existing stock through downsizing. The extent of this potential supply is illustrated by the scale of under-occupation in Croydon. As the figure below shows within the owner-occupied sector some 90% of four+ bedroom homes are under occupied.

Figure 9: Under-Occupancy by Tenure and Size (2011)



Source: ONS, Census

- 6.49 The equivalent figure in the social rental sector is much lower at 63% although within smaller homes (2-bedroom homes) under-occupation is as low as 26%. This highlights the issue being a particular focus in the market sector.
- 6.50 This does suggest some potential for the Council to shift its focus to smaller units to encourage downsizing. Although any positive impact on the use of the existing stock and encouraging downsizing could only be achieved if quality older persons accommodation in the right location is provided.
- 6.51 Within the London SHMA⁴ the move to reduce under-occupation saw a considerable reduction in the need for 3- and 4-bedroom homes with an increase in 1-bedroom homes which we have reflected below. However, such is the level of over-occupation within 1 and 2-bedroom homes in the PRS, Social Rental and to a lesser extent owner occupied sector then the shift should be perhaps towards 2- and 3-bedroom homes.
- 6.52 In order to understand the affordable rented housing mix, it is important to consider the current people on the housing waiting list to determine the profile of housing mix. The Local Authority Housing Statistics data for Croydon shows 5,138 people on the housing register. Of this, 57%

⁴ https://www.london.gov.uk/sites/default/files/london_shma_2017.pdf

require 2-bedroom homes. Given this, the analysis below shows a higher percentage requiring 2-bedroom homes and a smaller percentage requiring 3-bedroom and 1-bedroom homes.

6.53 There are thus a range of factors which are relevant in considering policies for the mix of affordable housing (rented) sought through development schemes. At a Borough-wide level, the analysis from Scenario 1, the Standard Method would support policies for the mix of affordable housing (rented) of:

- 1-bed properties: 15-20%
- 2-bed properties: 50-55%
- 3-bed properties: 20-25%
- 4-bed properties: 10-15%

6.54 The strategic conclusions recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.

6.55 The need for affordable housing of different sizes will vary by area (at a more localised level) and over time. In considering the mix of homes to be provided within specific development schemes, the information herein should be brought together with details of households currently on the Housing Register in the local area and the stock and turnover of existing properties.

6.56 In the affordable home ownership and market sectors, a profile of housing that more closely matches the outputs of the modelling is suggested, although some consideration of the current stock profile is also relevant.

6.57 Based on these factors, it is considered that the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households. On this basis the following mix of affordable home ownership is suggested:

- 1-bed properties: 30-35%
- 2-bed properties: 40-45%
- 3-bed properties: 15-20%
- 4-bed properties: 5-10%

6.58 Finally, in the market sector, a balance of dwellings is suggested that takes account of the demand for homes and the changing demographic profile as well as addressing under-occupation. The findings show higher recommended proportions for larger houses compared with other tenure groups. The following mix of market housing is suggested:

- 1-bed properties: 10-15%
- 2-bed properties: 45-50%
- 3-bed properties: 20-25%
- 4-bed properties: 15-20%

- 6.59 Although the analysis has quantified this based on the market modelling and an understanding of the current housing market, it does not necessarily follow that such prescriptive figures should be included in the plan making process.
- 6.59 The 'market' is to some degree a better judge of what is the most appropriate profile of homes to deliver at any point in time, and demand can change over time linked to macro-economic factors and local supply.
- 6.59 The figures can however be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by the demographic change in the area.

DRAFT

Housing Mix (Size of Homes Needed): Key Messages

- There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability.
- The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues. The conclusions also take account of the current mix of housing in the Borough (by tenure).
- Based on the evidence, it is expected that the focus of new market housing provision will be on three-bed properties through brownfield and or greenfield delivery. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium-sized properties (2 and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retain flexibility for friends and family to stay.
- The analysis linked to long-term (20-year) demographic change modelled the three scenarios. Based on Scenario 1, the Standard Method, the following represents an appropriate mix of affordable and market homes:

	1-bed	2-bed	3-bed	4+-bed
Market	10-15%	45-50%	20-25%	15-20%
Affordable home ownership	30-35%	40-45%	15-20%	5-10%
Affordable housing (rented)	15-20%	50-55%	20-25%	10-15%

- The affordable housing mix should inform strategic policies. In applying these to individual development sites regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level.
- The analysis of an appropriate mix of dwellings should also inform the 'portfolio' of sites which are considered by the local authority through its local plan process. Equally, it will be of relevance to affordable housing negotiations.

7 NEEDS OF SPECIFIC GROUPS

Introduction

- 7.1 This section of the report examines the housing needs for specific groups in Croydon, focusing on the need for housing for older persons, those with disabilities and students.
- 7.2 The analysis in this section draws on a range of statistics, including those suggested in the PPG (for which the Government has provided a summary data sheet 'Guide to available disability data') – termed the Guide in the analysis to follow. The discussion below begins by looking at older persons' needs.
- 7.3 Additionally, for some analysis, it is necessary to project the population forward. Reference for this is made to the demographic projections developed in this study (linking to an LHN of 2,302 dwellings per annum based on aligning housing and economic growth).

Current and Future Population of Older People

- 7.4 The table below provides baseline population data about older persons and compares this with London and England. The data has been taken from the published ONS mid-year population estimates and is provided for age groups from 65 and upwards. The data is for 2017 to reflect the latest published data for local authority areas and above.
- 7.5 The data illustrated in the table below shows that the population distribution of older persons in Croydon is very similar to the trend across London with a higher proportion of the population aged under 65 compared to the rest of the country.

Table 26: Older Person Population (2017)

	Croydon		London	England
	Population	% of population	% of population	% of population
Under 65	333,453	87%	88%	82%
65-74	27,892	7%	6%	10%
75-84	16,533	4%	4%	6%
85+	6,959	2%	2%	2%
Total	384,837	100%	100%	100%
Total 65+	51,384	13%	12%	18%

Source: ONS 2017 Mid-Year Population Estimates

- 7.6 It is estimated that 13% of Croydon's population is 65+ years old at 2017, which is similar to the trend across London at 12% and much lower than the rest of the country (18%).

7.7 As well as providing a baseline position for the proportion of older persons in the Borough, population projections can be used to provide an indication of how the numbers might change in the future compared with other areas. The data presented below uses the population projection linked to the housing need of 2,302 dpa.

7.8 In total population terms, the projections show an increase in the population aged 65 and over of 32,663 people (65%), this is against a backdrop of an overall increase of 15% in total population and an increase in the population aged under 65 of 7%.

Table 27: Projected Change in Population of Older Persons (2016 to 2036)

	2016 population	2036 population	Change in population	% change
Under 65	333,053	357,285	24,232	7%
65-74	27,099	43,574	16,475	61%
75-84	16,406	26,978	10,572	64%
85+	6,743	12,359	5,616	83%
Total	383,301	440,197	56,896	15%
Total 65+	50,248	82,911	32,663	65%

Source: GLH amendments to ONS subnational population projections (2016-based)

People with Disabilities

7.9 The CLG Disability data guide provides data about households with a long-term illness or disability from the English Housing Survey. Whilst this provides a national perspective, the source cannot provide more localised data. Hence the analysis below has drawn on the 2011 Census (which has a definition of long-term health problem or disability (LTHPD)).

7.10 The table below shows the proportion of people with a long-term health problem or disability (LTHPD) and the proportion of households where at least one person has a LTHPD. The data suggests that across Croydon, some 28% of households contain someone with a LTHPD.

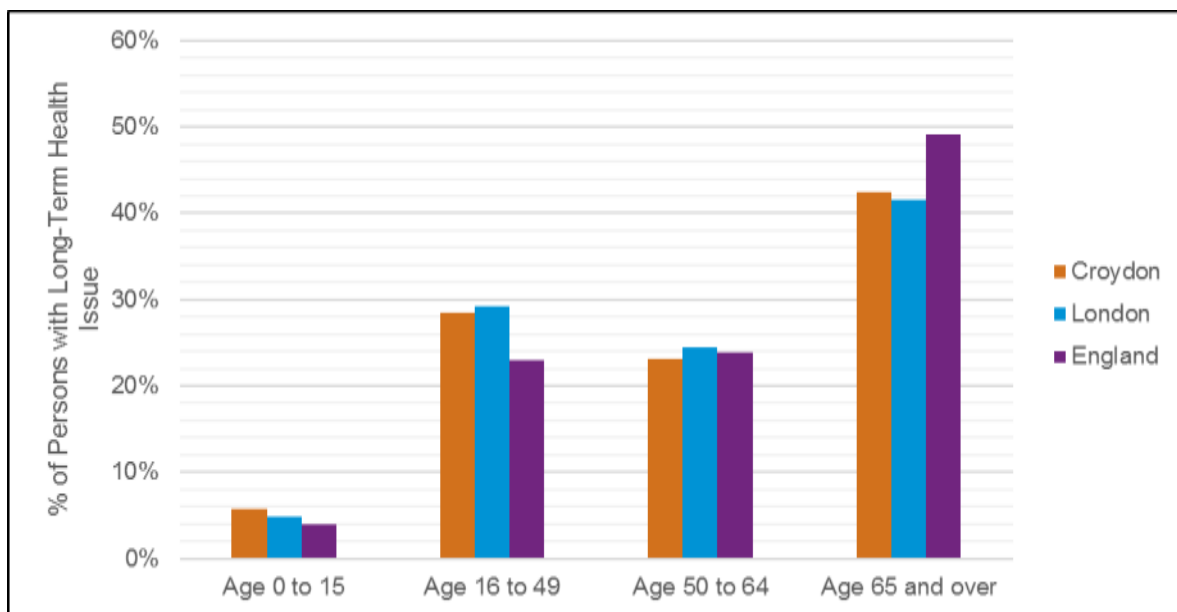
Table 28: Households and people with Long-Term Health Problem or Disability (2011)

	Households containing someone with health problem		Population with health problem	
	Number	%	Number	%
Croydon	41,262	28%	53,113	15%
London	910,432	28%	1,157,165	14%
England	7,217,905	33%	9,352,586	18%

Source: 2011 Census

7.11 This figure is lower than the national trend and broadly in-line with the London average. The figures for the population with a LTHPD show a similar pattern in comparison with London (an estimated 15% of the population of the Borough have a LTHPD) although slightly less than the rest of England.

Figure 10: Population with Long-Term Health Problem or Disability in each Age Band



Source: 2011 Census

7.12 The age-specific prevalence rates shown above can be applied to the demographic data to estimate the likely increase over time of the number of people with a LTHPD. In applying this information to the demographic projections, it is estimated that the number of people with a LTHPD will increase by around 22,822 (a 24% increase).

7.13 Across the Borough, a large percentage of this increase (61%) is expected to be in age groups aged 65 and over. The population increase of people with a LTHPD represents at least 40% of the total increase in the population estimated by the projections.

Table 29: Estimated change in population with LTHPD (2016-2036)

	Population with LTHPD		Change (2016-36)	% change from 2016
	2016	2036		
Based on 2,302 dpa	94,436	117,258	22,822	24.17%

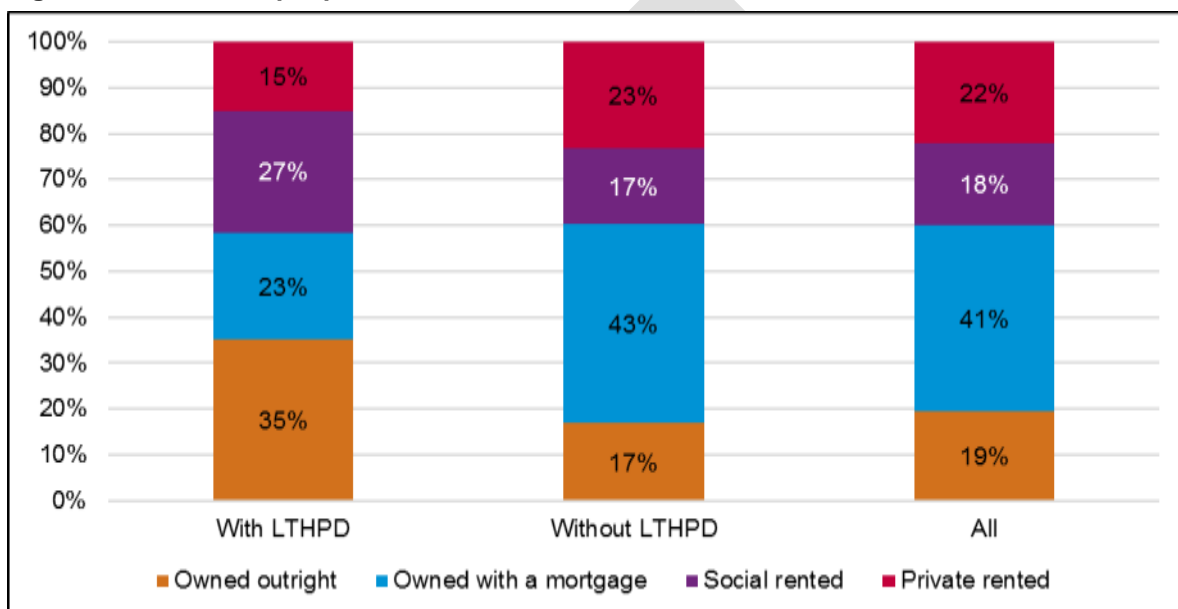
Source: Derived from demographic modelling and Census (2011)

7.14 It is likely that the age profile will impact upon the numbers of people with a LTHPD, as older people tend to be more likely to have a LTHPD. Therefore, the figure below shows the age bands of people with a LTHPD. It is clear from this analysis that those people in the oldest age bands in Croydon are more likely to have a LTHPD, greater than London.

7.15 The figure below shows the tenures of people with a LTHPD. It should be noted that the data is for the population living in households rather than households. The analysis clearly shows that people with a LTHPD in Croydon are more likely to live in owned outright housing (35%) which will be linked to the age profile of the population with a disability and also likely to live in social rented housing (27%).

7.16 Given that typically the lowest incomes are found in the social rented sector and to a lesser extent for outright owners, the analysis would suggest that the population/households with a disability are likely to be relatively disadvantaged when compared to the rest of the population.

Figure 11: Tenure of people with LTHPD



Source: 2011 Census

7.17 As a further sensitivity we have also examined the growth of people with disabilities which are likely to directly impact their demand for housing. This is drawn from projections from Projecting Older People Population Information (POPPI).

7.18 Linked to the standard methodology there is expected to be an increase in the number of people with dementia of around 2,750 between 2016 and 2036. There is an even larger increase in those with mobility problems (6891) over the same period.

Table 30: Estimated Population Change for range of Health Issues (2016 to 2036) – Croydon

	Type of illness/ disability	2016	2036	Change	% increase
Scenario 1	Dementia	3,500	6,251	2,751	78.6%
	Mobility problems	9,157	16,048	6,891	75.3%
Scenario 2	Dementia	3,500	5,891	2,391	68.3%
	Mobility problems	9,157	15,088	5,932	64.8%
Scenario 3	Dementia	3,500	6,149	2,650	75.7%
	Mobility problems	9,157	15,777	6,620	72.3%

Source: Data from POPPI and demographic projections

Housing for older people

- 7.19 Planning Practice Guidance note 56 (Housing: optional technical standards) sets out how local authorities can gather evidence to set requirements on a range of issues (including accessibility and wheelchair housing standards, water efficiency standards and internal space standards). This section looks at the first two of these (i.e. accessibility and wheelchair housing) as well as considering the specific needs of older people.
- 7.20 The PPG sets out that the reason for the approach to setting standards is designed to ‘rationalise the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes’ (56-001) and that ‘local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area’ (56-002).
- 7.21 The PPG sets out that local authorities should be using their assessment of housing need (and other sources) to consider the need for M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. It sets out that there are a range of published statistics which can be considered, including:
- the likely future need for housing for older and disabled people (including wheelchair user dwellings);
 - size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes);
 - the accessibility and adaptability of existing housing stock;
 - how needs vary across different housing tenures; and
 - the overall impact on viability.
- 7.22 However, there may be topography constraints in Croydon which may create barriers which would restrict the design and development of accommodation for older and disabled people to these standards.

- 7.23 This section of the report draws on a range of statistics, including those suggested in the PPG (for which the Government has provided a summary data sheet 'Guide to available disability data') – termed as the Guide in the analysis to follow. The discussion below begins by looking at older persons' needs.
- 7.24 For some analysis, it is necessary to project the population forward. Reference for this is made to the demographic projections developed in this study (linking to an LHN of 2,302 dwellings per annum based on aligning housing and economic growth).

Need for Specialist Accommodation

- 7.25 Given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward. The analysis in this section draws on data from the Housing Learning and Information Network (Housing LIN) along with demographic projections to provide an indication of the potential level of additional specialist housing that might be required for older people in the future.
- 7.26 The data for need is calculated by applying prevalence rates to the population aged 75+ and as projected forward. The prevalence rates have been taken from a toolkit developed by Housing LIN, in association with the Elderly Accommodation Council and endorsed by the Department of Health.
- 7.27 This database includes the need across the following categories (discussed in more detail below): sheltered housing, enhanced sheltered housing, extra care, residential care and nursing care. Additionally, the analysis draws on current supply estimates from HOPSR (Housing for Older People Supply Recommendations) – a database developed by Sheffield Hallam University along with data from the Elderly Accommodation Counsel (EAC) which provides an indication of the current tenure mix of such accommodation.

Definitions of Different Types of Older Persons' Accommodation

Retirement/sheltered housing:

A group of self-contained flats or bungalows typically reserved for people over the age of 55 or 60; some shared facilities lounge, garden, guest suite, laundry; plus, on-site supportive management. A regularly visiting scheme manager if s/he is available to all residents when on site. An on-call-only service does not qualify a scheme to retirement/sheltered housing. Developments usually built for either owner occupation or renting on secure tenancies.

Enhanced sheltered housing:

Sheltered housing with additional services to enable older people to retain their independence in their own home possible. Typically, there may be 24/7 (non-registered) staffing cover, at least one daily meal will be provided additional shared facilities. Also called assisted living and very sheltered housing.

Extra care housing:

Schemes where a service registered to provide personal or nursing care is available on site 24/7. Typically, at will be provided and there will be additional shared facilities. Some schemes specialise in dementia care or may have a dementia unit.

Care beds:

Care homes: Residential settings where a number of older people live, usually in single rooms, and have access to personal care services (such as help with washing and eating).

Care homes with nursing: These homes are similar to those without nursing care, but they also have registered nurses to provide care for more complex health needs.

Source: HOPSR

- 7.28 As well as setting out overall prevalence rates for different types of housing, the Housing LIN provides some suggestions for the tenure split between rented and leasehold accommodation (essentially public vs. private provision), this varies depending on an area's level of deprivation.
- 7.29 The data draws on assumptions from the Shop@ tool with adjustments based on the relative health of older people locally (from 2011 Census data) and a tenure split based on local deprivation levels (2015 IMD).
- 7.30 Consideration has also been given to overall levels of disability in the older person population; given that these are slightly higher than the national average a small upwards adjustment has been made.
- 7.31 The tables below report the older person's dwelling requirements for each of the three scenarios. The dwelling requirements use two categories of accommodation (in addition to care beds). These are a) Housing with Support (which covers retirement/sheltered housing) and b) Housing with Care (which includes the enhanced sheltered and extra-care housing).
- 7.32 Across all scenarios, most of the demand is for housing with support, particularly leasehold.

Scenario 1: Standard Methodology

7.33 The data in Scenario 1 in the table below suggests a current deficit of 745 dwellings (rented and leasehold) for housing with support and care and a shortfall of 453 care bed-spaces.

Table 31: Older Person Housing Requirements (2016 to 2036) Scenario 1: Standard Method

		Housing demand per 1,000 75+	Current supply	2016 Demand	Current shortfall (surplus)	Additional demand to 2036	Shortfall/ (surplus) by 2036
Housing with support	Rented	54	2,051	1,255	(796)	877	81
	Leasehold	65	575	1,515	940	1,060	2,000
Housing with care	Rented	23	358	527	169	369	538
	Leasehold	20	38	470	432	329	761
Care bed-spaces		105	1,985	2,438	453	1,705	2,157

Source: Derived from demographic projections and Housing LIN/HOPSR/EAC

7.34 Projecting these prevalence rates forward the changing and aging population results in a high deficit of 3,380 housing with support and/or care by 2036. There will also be an increased deficit in care bed spaces, reaching 2,157 at 2036.

Scenario 2: Croydon Local Plan

7.35 The table below reports the older person housing requirements under Scenario 2, Croydon Local Plan. Under this scenario, the current deficit of 745 housing with support and housing with care increases to a deficit of 3,245 by 2036.

Table 32: Older Person Housing Requirements (2016 to 2036) Scenario 2: Local Plan

		Housing demand per 1,000 75+	Current supply	2016 Demand	Current shortfall (surplus)	Additional demand to 2036	Shortfall/ (surplus) by 2036
Housing with support	Rented	54	2,051	1,255	(-796)	833	36
	Leasehold	65	575	1,515	940	1,006	1,946
Housing with care	Rented	23	358	527	169	350	519
	Leasehold	20	38	470	432	312	744
Care bed spaces		105	1,985	2,438	453	1,618	2,071

Source: Derived from demographic projections and Housing LIN/HOPSR/EAC

7.36 Care bed-spaces currently have a deficit of 453 beds and are projected to experience additional demand for 1,618 beds with a surplus of 2,071 by 2036.

Scenario 3: Draft London Plan

7.37 Under Scenario 3, the Draft London Plan, the current deficit of 745 housing with support and housing with care increases to a deficit of 3,511 by 2036.

Table 33: Older Person Housing Requirements (2016 to 2036) Scenario 3: Draft London Plan

		Housing demand per 1,000 75+	Current supply	2016 Demand	Current shortfall (surplus)	Additional demand to 2036	Shortfall/ (surplus) by 2036
Housing with support	Rented	54	2,051	1,255	-796	921	125
	Leasehold	65	575	1,515	940	1,112	2,053
Housing with care	Rented	23	358	527	169	387	556
	Leasehold	20	38	470	432	345	777
Care bed spaces		105	1,985	2,438	453	1,789	2,242

Source: Derived from demographic projections and Housing LIN/HOPSR/EAC

7.38 Care bed spaces currently have a deficit of 453 beds and are forecast to experience a deficit of 2,242 beds by 2036.

7.39 For all scenarios most of the demand (2016) for specialist accommodation is for housing with support (61%) compared to 38% for housing with care. The data shows a split of demand for leasehold tenure (82%).

7.40 However, while the modelled outputs of the Housing LIN above are based on historic provision rates there are other ways of addressing this need. The Croydon Alliance for example is set up to care for people in their homes for as long as reasonably possible and can also be supported through short term residential stays or providing for the specific needs of their clients.

Student accommodation

7.41 In terms of planning to meet the needs of student accommodation, the PPG (Paragraph 017) outlines that strategic policymakers need to plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings.

7.42 It is recognised that encouraging more dedicated student accommodation may take pressure off the private rented sector and increases the overall housing stock. The table below shows the growth in student households between 2001 and 2011.

Table 34: Change in student households (2001 to 2011)

	2001	2011	Change (%)
Croydon	81	319	294%
London	14,034	24,384	74%
England	79,143	124,285	57%

Source: 2001 and 2011 Census

- 7.43 In comparison to London and the rest of the nation, Croydon has experienced significant growth in the number of student households, increasing by an additional 238 (294%) between 2001 and 2011. However, the growth is from a very low base and compared to the wider number of households this is negligible.
- 7.44 Currently, most students living in Croydon are in the private rental market (59%), 24% are living rent free (potentially living in tied accommodation) and 9% in social rent. A small proportion are owner-occupiers (7%) and in shared ownership (1%).
- 7.45 This make up of students by tenure is similar to the London trend, however there is a greater proportion (87%) of students privately renting in London and less (4%) in social rented housing. The London trends in student accommodation is more aligned with what is happening at a national level.

Private Rented Sector

- 7.46 This section looks at a range of statistics in relation to the private rented sector (PRS) in Croydon. Where possible, comparisons are made with other tenures (i.e. owner-occupied and social rented) as well as contrasting data with other areas. The aim is to bring together a range of information to inform the need for additional private rented housing in the Borough.

Size of the Private Rented Sector

- 7.47 The table below shows the tenure split of housing in 2011 in Croydon, London and England.
- 7.48 The data identifies approximately 28,762 households living in private rented housing in Croydon—20% of all households. This proportion is notably higher than London (16%) and yet lower than the national rate of 24%.
- 7.49 In Croydon, there are approximately 1,710 households (1%) recorded as living in 'other' PRS accommodation which is likely to be housing linked to employment. This split is aligned with the proportion across London and England (1%).

Table 35: Households by Tenure in Croydon (2011)

	Croydon	London	England
Owns outright	34,882	6,745,584	689,898
Owns with mortgage/loan	50,348	7,229,440	886,309
Social rented	25,887	3,903,550	785,993
Private rented	28,762	3,401,675	775,591
Other	1,710	314,249	43,494
Total	141,589	21,594,498	3,181,285
% private rented	20%	16%	24%

Source: Census (2011)

7.50 As well as looking at the current tenure profile, it is of interest to consider how this has changed over time. The table below shows change in tenure for Croydon from the 2001 and 2011 Census.

7.51 There has been significant growth in the number of households living in privately rented accommodation (69%) and only a slight increase in outright owners (2%). Increase in outright owners is attributed to mortgages being paid off, which may have been assisted by a period of low-interest rates.

7.52 There has been a decline in the number of owners with a mortgage (-16%) and a decrease in the number of other households (46%).

Table 36: Change in tenure (2001-11) – Croydon

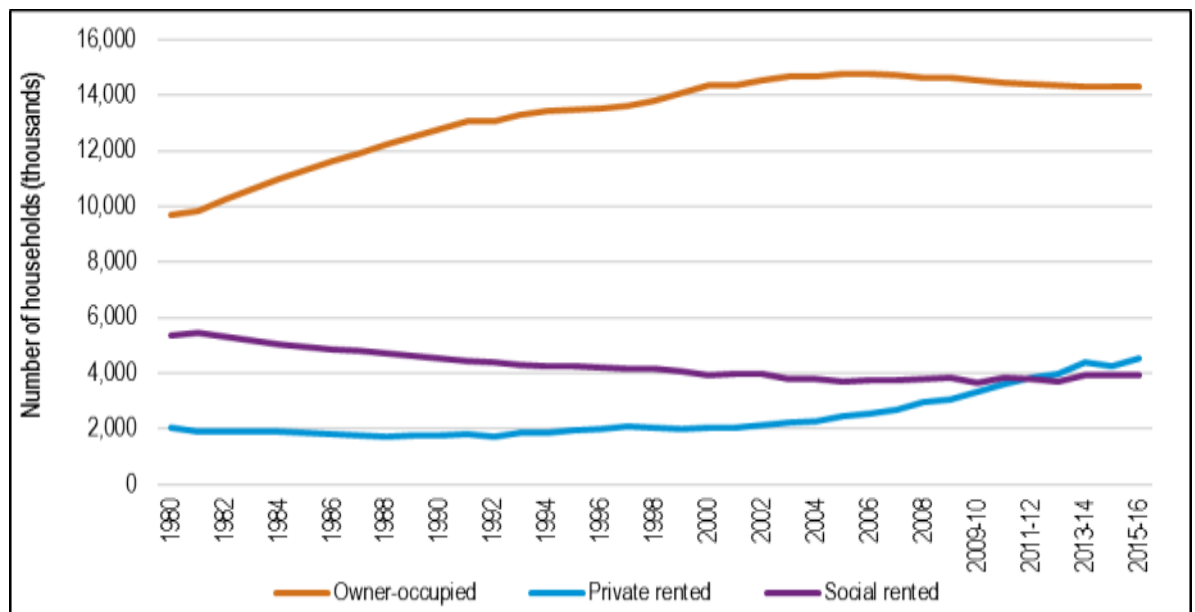
	2001 households	2011 households	Change	% Change
Owns outright	34,169	34,882	713	2%
Owns with mortgage/loan	60,143	50,348	-9,795	-16%
Social rented	23,339	25,887	2,548	11%
Private rented	16,969	28,762	11,793	69%
Other	3,166	1,710	-1,456	-46%
Total	137,786	141,589	3,803	3%

Source: 2001 and 2011 Census

7.53 The PRS has clearly been growing rapidly over time, in Croydon the South East Region and the rest of the nation. It is also worth considering what further changes may have occurred since 2011. Unfortunately, robust local data on this topic is not available, however, a national perspective can be drawn from the English Housing Survey (EHS) which has data up to 2016. The figure below shows changes in three main tenures back to 1980.

7.54 This clearly shows the increase in the number of households living in private rented accommodation from about 2001 and also a slight decrease in the number of owners. Since 2011, the EHS data shows that that PRS has risen by a further 25%.

Figure 12: Trends in tenure, 1980 to 2015-16 – England



Source: English Housing Survey

Self and Custom-build

7.55 Housing Needs Assessments should investigate the contribution that self-build makes toward the local supply. Laying the Foundations – a Housing Strategy for England 2010 sets out that only one in 10 new homes in Britain was self-built in 2010 – a lower level than in other parts of Europe. It identifies barriers to self or custom-build development as including:

- A lack of land;
- Limited finance and mortgage products;
- Restrictive regulation; and
- A lack of impartial information for potential custom home builders.

7.56 Government aspires to make self-build a ‘mainstream housing option’ by making funding available to support self-builders and by asking local authorities to champion the sector. Up to £30m of funding has been made available via the Custom Build programme administered by the HCA to provide short-term project finance to help unlock group custom build or self-build schemes. The fund can be used to cover eligible costs such as land acquisition, site preparation, infrastructure, S106 planning obligations etc.

7.57 In the London Borough of Croydon, there are currently 60 individuals and 1 association on the custom and self-build register. Of those on the register, 31% are located in Croydon. Others are located in areas across London and outside of London including Milton Keynes.

7.58 Those registered identified the reason why they are interested in designing and or building their own home. A high proportion noted the desire to own a home of their own design and specifications (38%), 19% wanted an environmentally low-impact home and the same proportion wanted to physically build their own home. Notably, 6% identified that they wanted a home that they can afford to buy.

7.59 Of those registered, 24% are on annual incomes over £100k, 20% are on annual incomes under £50k and 12% are on income of £60k and £70k.

Service Families

7.60 MOD statistics report that at April 2018, there were a total of 20 military and civilian personnel (including 10 military and 10 civilians) located in Croydon. This is part of a total of 7,720 (4,380 military and 3,340 civilians) located in London.

7.61 There are no barracks or bases in Croydon and the number of service personnel located in the Borough is quite low, however there will be a need to ensure service personnel and their families are accommodated in suitable accommodation. However, the Council should engage with neighbouring local authorities through the Duty to Co-operate for any matter relating to housing need for service families.

7.62 The Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations ensure that Service personnel (including bereaved spouses or civil partners) can establish a 'local connection' with the area in which they are serving or have served.

7.63 This prevents ex-service personnel would not suffer disadvantage from any 'residence' criteria chosen by the Local Authority in their allocations policy. In addition, any ex-armed forces personnel with mental health issues who present themselves to the Council as homeless would be assisted as a vulnerable group and will be given priority need for housing.

8 SUMMARY AND CONCLUSIONS

8.1 The Croydon SHMA Update follows the approach to housing need using the standard methodology as set out by the Government in the NPPF (February 2019). Two other housing growth scenarios have been modelled to understand potential housing mix linked to the Croydon Local Plan and Draft London Plan.

Standard Methodology

8.2 The standard methodology seeks to simplify the approach to housing need and has three components:

- Starting Point or Baseline;
- Market Signals Adjustment; and
- Cap.

8.3 The starting point is the 2014-based household projections and we have examined the growth in the period 2019-29. As set out in the table below over this period the 2014-based projections show a household growth of 2,473 households per annum.

8.4 The standard methodology then seeks to adjust the demographic baseline based on market signals. In 2017 the median workplace affordability ratio in Croydon was 11.2 (published in May 2018). The adjustment factor is therefore 0.446 (or 44.6%).

Table 37: Housing Need Derived from Baseline and Affordability Adjustment

	Household Change (19-29)	Step 2 Output
2019-2029	24,726	3,574

Source: ONS and DHCLG, 2016 and 2018

8.5 Applying this to the 2014-based household projections over the 2019-2029 period would take the housing need to 3,574 dwellings per annum.

8.6 The final stage of the proposed methodology is to cap the LHN to a level which is deliverable. In the case of Croydon (which has a recently adopted Local Plan) the cap is applied to the lower of the adopted Local Plan figure (1,644 dpa) or the output from stage 2 (3,574 dpa) i.e. 40% above the Local Plan figure. This cap means the uplift is reduced from 44.6% to 40% and results in a need for 2,302 dpa.

8.7 The analysis has also modelled housing growth under Scenario 2, the Croydon Local Plan and Scenario 3, the Draft London Plan. Scenario 2 identified a housing need of 1,644 dwellings per

annum (34,016 dwellings in total) over the period 2016 to 2036. Scenario 3 identified a greater housing need at 2,949 dwellings per annum (56,202 dwellings in total) over the period 2019/20 to 2028/29.

Affordable Housing Need

- 8.8 The report has considered the net need for affordable rented housing; using the Basic Needs Assessment Model recommended in the PPG. Using the LHN figure in Scenario 1, the analysis calculates an overall gross need for affordable rented housing of 2,966 units per annum over the period to 2036 in Croydon. Accounting for re-let supply of 788 units per annum reduce the need to a net need of 2,178 units per annum to 2036.
- 8.9 Affordable housing need was also identified for Scenario 2 and Scenario 3. A total gross need of 2,782 was found for Scenario 2 and 3,147 under Scenario 3. Considering re-let supply, the net need arrived at 1,994 under Scenario 2 and 2,359 under Scenario 3.
- 8.10 The affordable housing need identified in Scenario 1 was compared with the previous assessment undertaken in the SHMA (2015) (which used slightly different assumptions). This indicated that affordable housing need in the Borough has increased notably since the previous assessment.

Tenure Mix

- 8.11 In analysing the need for housing of different tenures, it needs to be recognised that there are a series of choices to be made regarding the provision of new affordable housing; essentially a trade-off between the affordability of accommodation and the number of homes that can viably be provided.
- 8.12 This supports the BNP Paribas report which looks at the impact of seeking London Affordable Rent rather than affordable rent at 80% of market rent. Hence the analysis in this report can only provide a guide to the types of affordable housing that should be provided.
- 8.13 To aid the decision-making process regarding these choices, the following breakdown of tenure could be used as a starting point.
- 60% market
 - 10% affordable home ownership
 - 30% social/affordable rented
- 8.14 However, this comes with a series of caveats including the viability of providing different types of affordable housing. Further, the cost of affordable home ownership properties can sometimes

exceed those of lower cost market homes and thus cannot be truly considered as “affordable”, albeit they might be recognised as such by the government.

Need for Different Types and Sizes of Homes

8.15 The modelling outputs provide an estimate of the proportion of homes of different sizes that are needed, there are a range of factors which should be considered in setting policies for provision. The mix of affordable rented housing sought through development at a borough-wide level should be as follows:

- 1-bed properties: 15-20%
- 2-bed properties: 50-55%
- 3-bed properties: 20-25%
- 4-bed properties: 10-15%

8.16 The strategic conclusions recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households. The limited flexibility which one-bed properties offer to changing household circumstances create flow on implications such as higher turnover and management issues and the issue of single people under 35 years old only being eligible to claim benefits for a room in a shared house.

8.17 The provision of affordable home ownership should be more explicitly focused on delivering smaller housing for the rise of households with dependent children (approximately 30% change by 2036) and the rise of other households, primarily comprising of student households (approximately 85% change by 2036). On this basis, the following mix of affordable home ownership housing is suggested:

- 1-bed properties: 30-35%
- 2-bed properties: 40-45%
- 3-bed properties: 15-20%
- 4-bed properties: 5-10%

8.18 In the market sector, a balance of dwellings is suggested that takes account of both the demand for homes and the changing demographic profile and addressing under-occupation. The following mix of market housing is suggested:

- 1-bed properties: 10-15%
- 2-bed properties: 45-50%
- 3-bed properties: 20-25%
- 4-bed properties: 15-20%

- 8.19 The figures can, however, be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by the demographic change in the area or linked to macro-economic factors and local supply.
- 8.20 The need for affordable housing of different sizes will vary by area (at a more localised level) and over time. In considering the mix of homes to be provided within specific development schemes, the details of households currently on the Housing Register in the local area and the stock and turnover of existing properties should be taken into account.
- 8.21 The identified housing mix should inform strategic planning and housing policies. In applying recommended housing mix to individual development sites, regard should be had to the nature of the development site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level.
- 8.22 In drawing up a housing mix policy the Council may also be mindful of other considerations including the waiting list, the recent and pipeline supply or local aspiration which might mean moving away from our recommendations.

Older Persons Housing Need

- 8.23 The Housing Needs Assessment indicates that the number of residents aged over 65 in Croydon is forecast to increase by 65% over the period to 2036 based on the standard methodology. Because of a growing older population and increasing life expectancy, there is a clear need to accommodate households that require adaptations to properties to meet their changing needs whilst others may require more specialist accommodation or support. There is clear evidence of need for properties which are capable of accommodating people's changing needs.
- 8.24 Based principally on the expected growth in the population of older persons, by 2036, there is an expected shortfall in housing with support and housing with care (a total shortfall of 3,380 homes – excluding care home bedspaces). It also identifies a need for an additional 2,309 care bed-spaces.

Table 38: Need for Specialist Housing for Older People in Croydon, 2016-2036

		Housing demand per 1,000 75+	Current supply	2019 demand	Current surplus	Additional demand to 2036	Surplus by 2036
Housing with support	Rented	54	2,051	1,255	-796	956	159
	Leasehold	65	575	1,515	940	1,154	2,095
Housing with care	Rented	23	358	527	169	401	570
	Leasehold	20	38	470	432	358	790
Care beds	-	105	1,985	2,438	453	1,857	2,309

Source: Derived from demographic projections and Housing LIN/HOPSR/EAC

- 8.25 Registered care provision falls within a C2 use class, with households who live in care homes counted as part of the institutional rather than the household population. As such provision of residential care is treated in the analysis of this report from that for C3 dwellings (and is separate to the C3 housing LHN).
- 8.26 Decisions about the appropriate mix of specialist housing should take account of the current stock, other local needs evidence as appropriate, and policies regarding accommodation and care for older persons.
- 8.27 GL Hearn recommends that the Council should consider how best to deliver the identified specialist housing need, including, for instance, the potential to identify sites in accessible locations for specialist housing or to require the provision of specialist housing for older people as part of larger strategic development schemes.
- 8.28 Given the evidence, the Council could consider (as a start point) requiring all dwellings to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and at least 10% of homes which are allocated by the local authority meeting M4(3). Although this would need to take into consideration such things as site topography or layout. It should however be noted that there will be cases where this may not be possible (e.g. due to viability or site-specific circumstances) and so any policy should be applied flexibly.

8.29

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Croydon Borough Council

Green Belt and Metropolitan Open Land Study

DRAFT Report





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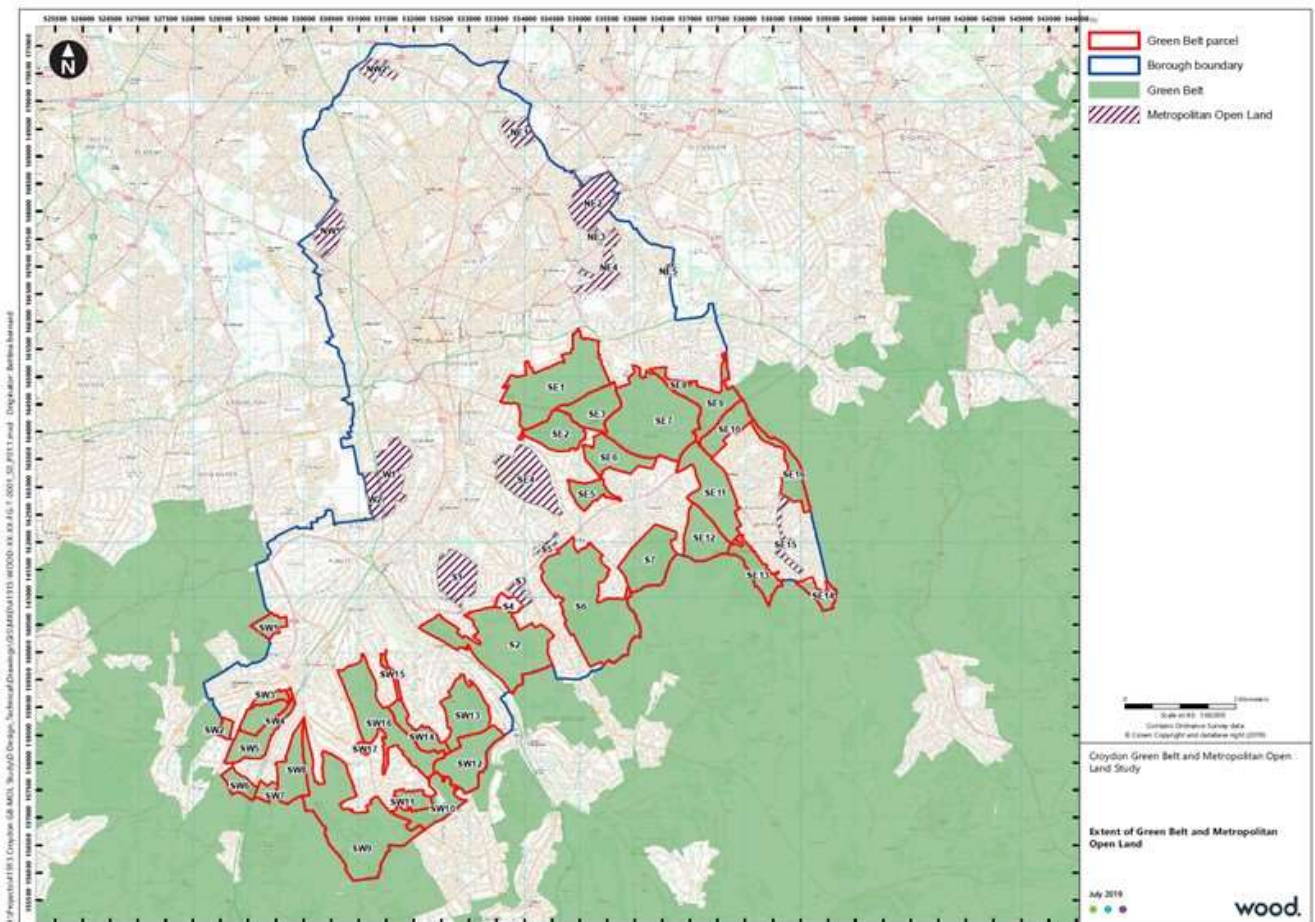


Executive summary

Purpose of this report

1. This report has been produced for the purpose of setting out the results of an Assessment of the role of Green Belt and Metropolitan Open Land (MOL) in the London Borough of Croydon (hereafter Croydon or Croydon Council).
2. Croydon Council has begun the production of a new Local Plan that will guide development in the Borough until 2041 and is gathering evidence to help inform key land use planning issues. This report forms part of that evidence base.
3. Around one quarter of the Borough is designated as either Green Belt or MOL (Figure 1), forming part of the London Metropolitan Green Belt and the London-wide MOL network. The National Planning Policy Framework (NPPF (2019) establishes that Green Belt designation aims to prevent urban sprawl and keep land permanently open and the London Plan explains that the NPPF’s Green Belt policies should apply to MOL.

Figure 1 The Green Belt and MOL within Croydon in Context



4. A detailed review of the Green Belt and Metropolitan Open Land undertaken in 2016 assessed the Green Belt role of very fine-grained parcels. The 2016 study was part of the evidence base for the Examination of the Croydon Local Plan in 2018. Through this current study, the opportunity has been taken to add to the 2016 review through the identification and assessment of strategic parcels. Together these two

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studies provide a detailed picture of the character and role of the Green Belt and MOL as part of the evidence base for the emerging Local Plan.

4. The overall aim of the Assessment is to provide Croydon Council with an objective, evidence-based assessment of how the Green Belt with the Borough contributes to purposes set out in the NPPF and the extent to which MOL meets both Green Belt purposes and the criteria specified in the London Plan.
5. The Assessment covers all of the Green Belt and MOL across the Borough. As Green Belt and MOL boundaries do not always neatly follow administrative boundaries, the Assessment also covers small parts of neighbouring authorities' Green Belt and MOL. Parcels of land are defined as the basis for assessing areas of Green Belt and MOL, an approach which is consistent with studies undertaken in other authorities.
6. A straightforward colouring system (see below) and accompanying commentary is used to set out the conclusions for each parcel and to produce maps which summarise the extent to which each parcel fulfils each Green Belt purpose and MOL criteria along with an overall assessment (a summary matrix and accompanying maps). This provides a tabular and graphical presentation of the contribution of land to Green Belt purposes and MOL criteria.
7. None of the judgements on the relative contribution of the parcel to Green Belt purposes and MOL criteria are scored or weighted and the overall assessment reflects the professional judgement of the study team on the contribution of the parcel against individual purposes/criteria and overall. Thus a Significant Contribution in respect of a particular purpose or criteria, and a Limited or No Contribution in all other respects, will lead to an overall judgement of Significant Contribution reflecting the parcel's primary purpose. Equally, Contributions identified across a number of purposes or criteria may still only lead to a judgement of a Contribution overall. The Assessment does not consider specific parcels in terms of their suitability for development.
8. The colouring assessment for Green Belt purposes and MOL criteria is as follows:



The parcel makes a **Significant Contribution** to a Green Belt purpose/MOL criteria clearly and unambiguously.



The parcel makes a **Contribution** to a Green Belt purpose/MOL criteria against the assessment purpose/criterion, although this is not especially distinct in character and/or has been compromised by development.



The parcel makes a **Limited or No Contribution** to a Green Belt purpose/MOL criteria because of either performing no clear role in a particular location and/or has been compromised by development.

9. The geography of the Green Belt and MOL within Croydon reflects the character and evolution of urban development, the location of Borough boundaries and land use. Green Belt is part of the transition zone between the densely populated suburbs of Greater London, and more open countryside (although in places urbanised) to the south, and in combination with land in adjacent authorities, is part of the Metropolitan Green Belt which extends around Greater London. As such, land use is often of a diverse 'urban fringe' character comprising golf courses and horsiculture, but also very extensive tracts of dense woodland of nature conservation value and common land with an attractive matrix of wooded and more open areas. Within the dense urban area, MOL forms the larger areas of undeveloped land, which are often resources of significant community value.
10. The assessment of the extent to which land meets Green Belt purposes and MOL criteria is illustrated in Figure 2 and Figure 3. Clearly there is significant diversity amongst the contribution made to individual purposes and amongst the fulfilment of MOL criteria, but the broad pattern is clear, including extensive



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areas making a significant overall Contribution, often reflecting a specific purpose, but also their cumulative roles (particularly in the case of MOL).





Figure 2 Overall Contribution to Green Belt Purposes

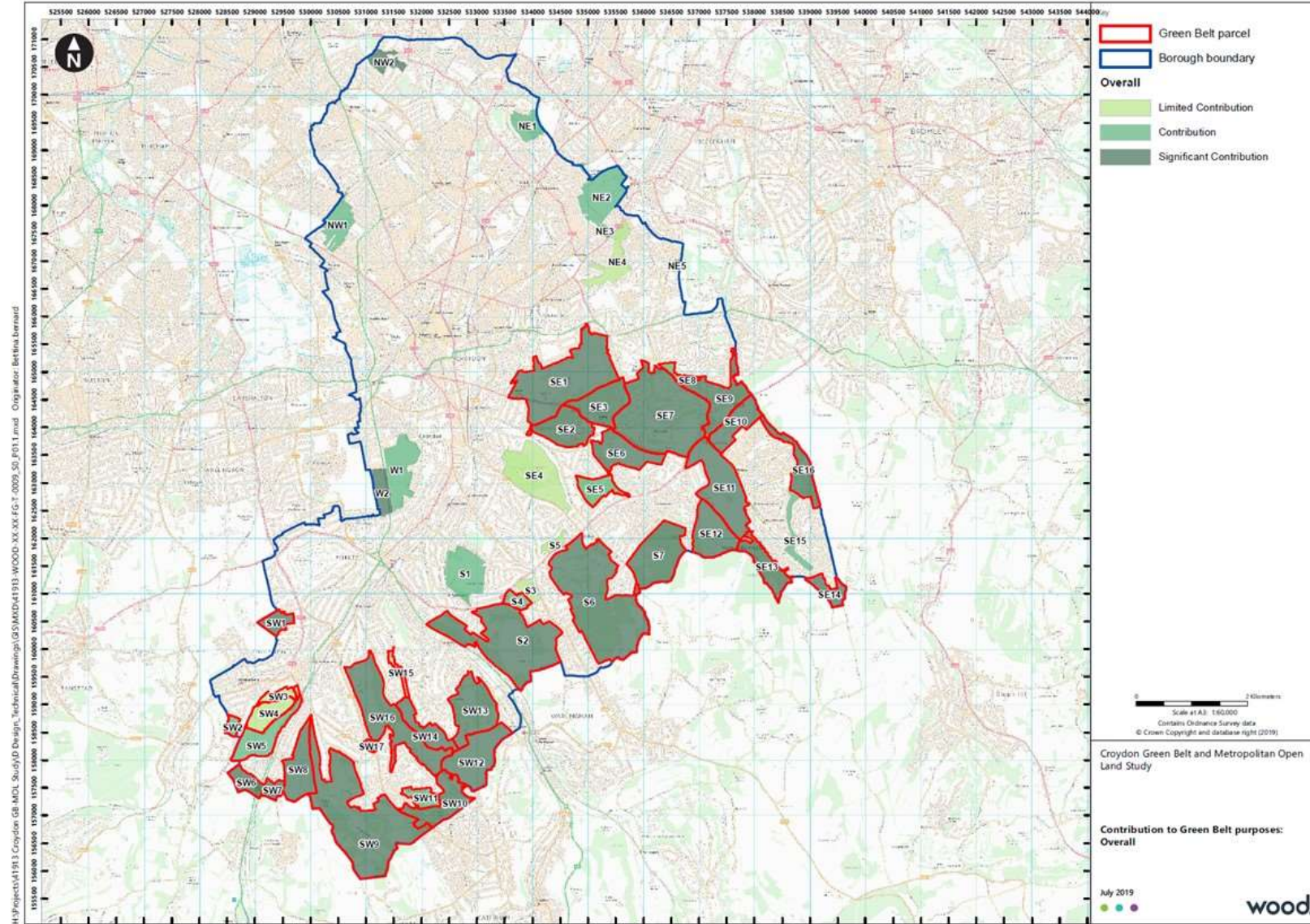
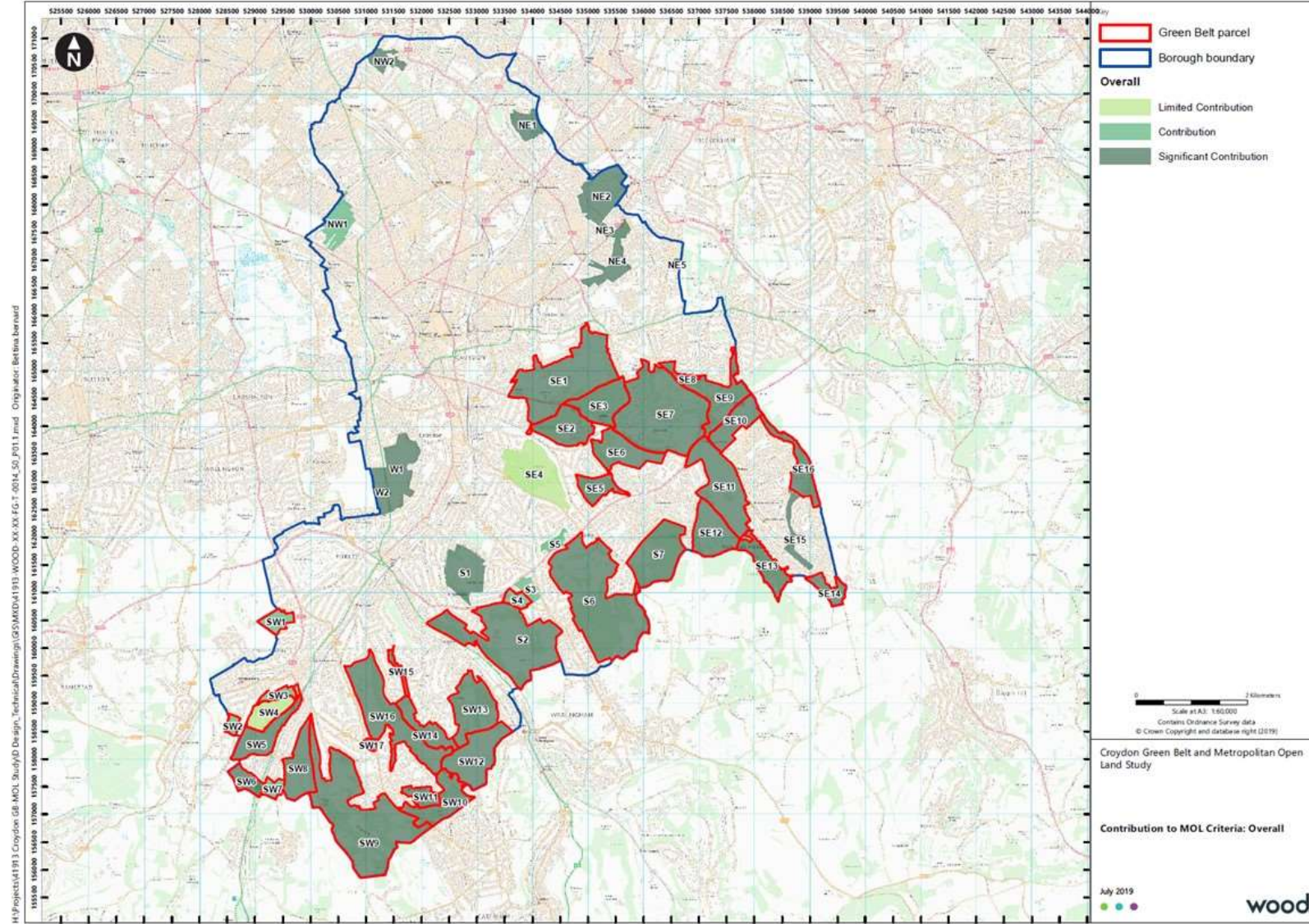


Figure 3 Overall Contribution to Metropolitan Open Land Criteria



Observations

11. The Green Belt and MOL perform their function with only one instance of either designation not being fulfilled (this reflecting the parcel being fully developed). The key principle of the Green Belt, which is the maintenance of openness, has largely been fulfilled, with the maintenance of a clear distinction between town and country, albeit within the context of a pre-Green Belt pattern of suburban development which has resulted in an often complex configuration of built form on the outer edge of Greater London.
33. Reflecting its role as the inner edge of the Metropolitan Green Belt, the strategic function of the containment of sprawl is a particularly significant one, containing the built edges of suburbs within the Borough, notably at Coulsdon (Old Coulsdon), Purley (Kenley), Sanderstead, Selsdon and New Addington. The role of the Green Belt therefore needs to be considered in the context of the wider Green Belt within Reigate & Banstead, Tandridge and Bromley in particular. Whereas much of this Green Belt serves to prevent encroachment (i.e. erosion of openness through incremental change) of the wider countryside, the principal role of the Green Belt within Croydon is preventing sprawl from often unbounded suburban built edges, a characteristic which makes them potential vulnerable to incremental extension.
34. As a result of the evolution of the pattern of suburban growth, the role of the Green Belt in performing a separation function is often less clear, with linear extensions of the suburbs typically following lower ground, leaving higher ground as dense woodland and/or open grassland. The results present an often-complex interweaving of suburbs with typically little indication of separate identity or where one community starts and another finishes. Green Belt within the southern extent of the Borough plays a continuing role in helping to define the character of these communities, providing part of their context. These separating areas can often be vulnerable to erosion as a result of their size and configuration.
35. Assessment of the role of the Green Belt against MOL criteria reveals a significant role in the provision of assets which are of Metropolitan importance. This includes recreational routes and land which is part of the All London Green Grid green infrastructure network and also considerable areas which are designated as Sites of Nature Conservation Importance (of Metropolitan Importance or Borough Grade I or II). Whilst this is not a Green Belt consideration *per se*, development is typically precluded.
36. Reflecting the often spatially fragmented character of the Green Belt, there are instances of the MOL function being dominant within Green Belt parcels and therefore this potentially being a more appropriate designation than Green Belt.
37. The role of the Green Belt in respect of its purposes varies considerably by area, reflecting the geography of the settlement pattern and how this historic growth has, for example, created various enclosed areas of Green Belt which perform sometimes locally-specific roles which are no less important in respect of place-shaping than the clearer edge of town containment function. Thus, to the south and southeast of the Borough along its border with Tandridge District, the containment of the suburbs of Coulsdon, Sanderstead, Selsdon and New Addington is clear, preventing their potential sprawl into open countryside. In addition, the separation of some of these areas is aided, as well as the prevention of the incremental encroachment of development within open land which can rapidly erode its physical and visual continuity.
38. The relationship between the Green Belt and MOL and Conservation areas can be complex, forming both the context for, and in some cases, the extent of the Conservation Area. Whilst not a strategic Green Belt purpose *per se*, the role of open land for sensitive built environments can be critical and locally highly significant. The clearest expression of the relationship is the setting of the Addington Conservation Area within the Green Belt.
39. Equally, again in a locally significant context, is the relationship between Green Belt and MOL and Registered Parks and Gardens, delivering complementary roles. The Borough has several examples, including at Norwood Grove, Croham Hurst and Coulsdon Manor (the latter two being golf courses).

40. The form and function of MOL often differs from the Green Belt because of its different geography and rationale. In such a densely urbanised areas as Croydon (to the north of its southern fringes) open land can be a rare and hence highly valued asset as a relief from the monotony of built form, a focus for recreation and, in some instances, an important biodiversity asset. The MOL within Croydon very largely fulfils its functions to a significant degree, often contributing to London's GI network as parts of strategic recreational and wildlife corridors. The important interrelationship between Green Belt and MOL within Croydon is expressed through the analysis of Green Belt against MOL purposes which reveals an often significant contribution to their recreational and GI-focus, complementing the place-shaping role of Green Belt. This is particularly important when considering the inner edge of the Metropolitan Green Belt where the Green Belt can be fragmented and locally specific in its role.

Use of this report

41. This report is part of the wider evidence base being assembled by Croydon as part of the preparation of the Local Plan. As such, the findings and conclusions will be used in conjunction with other evidence studies which together inform decision making. No recommendations are made in the report regarding areas which may or may not hold potential for their status as either Green Belt or MOL to be changed in light of what is termed 'Exceptional Circumstances'. Further detailed work would be required to determine the effects (strategically and locally) of any such proposals.

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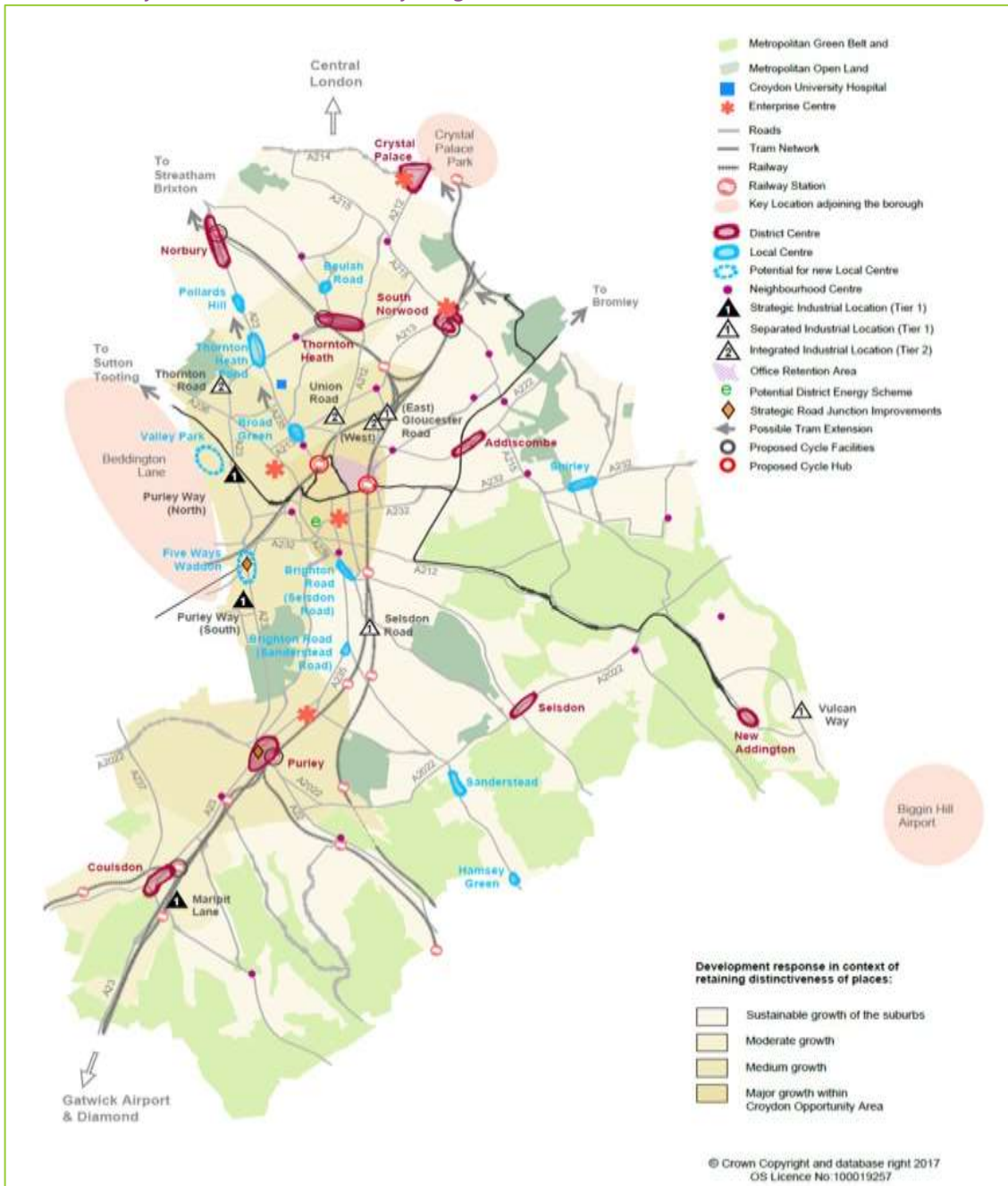
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1. Study Remit and Policy Context

1. Croydon Borough Council (hereafter Croydon) has begun the production of a new Local Plan that will guide development in the Borough over the next 25 years. As part of the development of the Local Plan, evidence gathering has begun to help inform key land use planning issues.
2. Around 2,500ha of the Borough is designated as either Green Belt or Metropolitan Open Land (MOL), forming part of the London Metropolitan Green Belt and the London-wide MOL network (Figure 1.1). This equates to around one quarter of the area of the Borough. The National Planning Policy Framework (NPPF, 2019) establishes that Green Belt designation aims to prevent urban sprawl and keep land permanently free from development and the London Plan explains that the NPPF's Green Belt policies should apply to MOL.

Figure 1.1 Croydon Local Plan 2018 Key Diagram



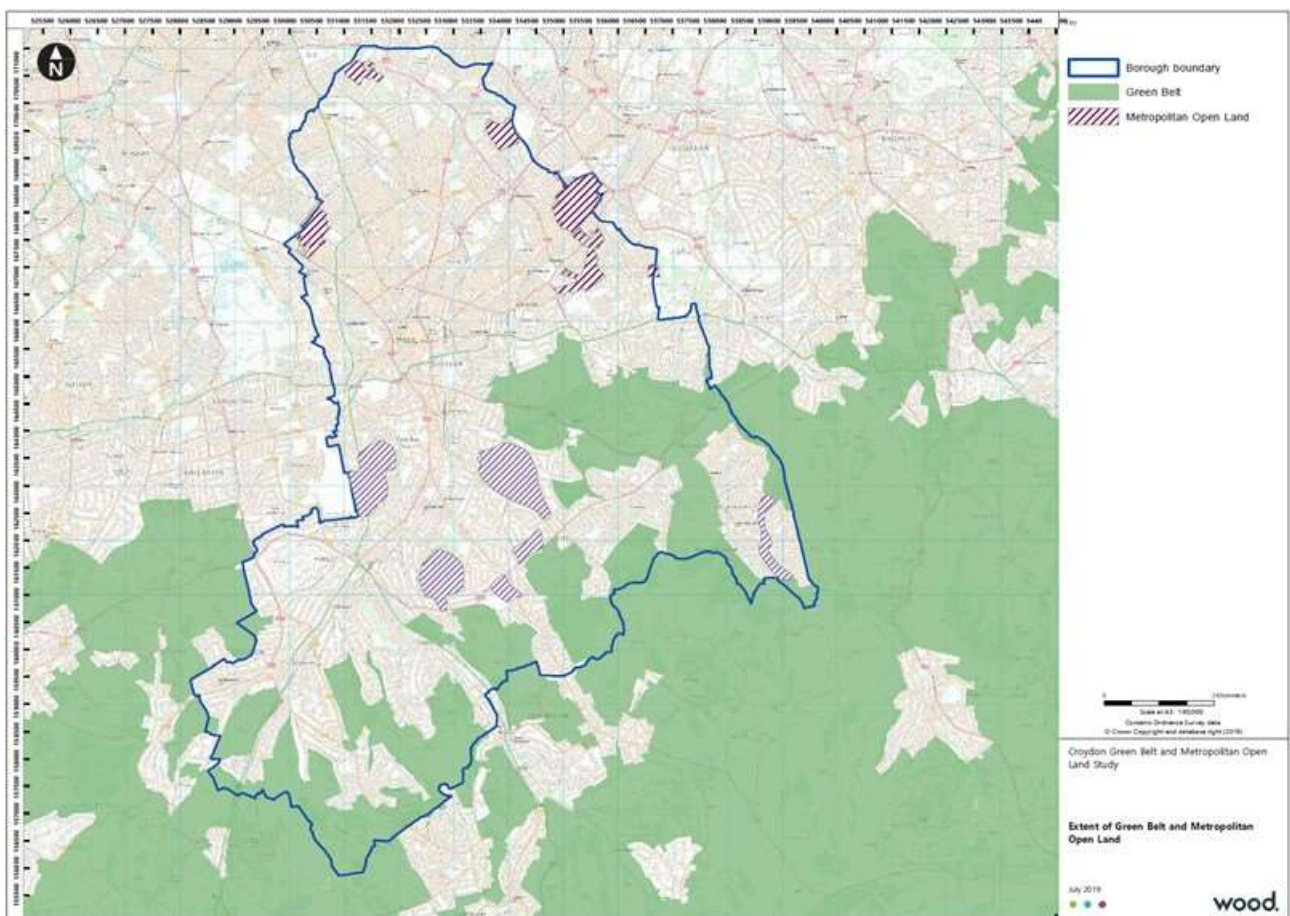
3. The overall aim of the study is to provide Croydon Council with an objective, evidence-based assessment of how the Green Belt with the Borough contributes to purposes set out in the NPPF and the extent to which MOL meets both Green Belt purposes and the criteria specified in the London Plan.
4. A detailed review of the Green Belt and Metropolitan Open Land undertaken in 2016 assessed the Green Belt role of very fine-grained parcels. The 2016 study was part of the evidence base for the Examination of the Croydon Local Plan in 2018. Through this current study, the opportunity has been taken to add to the 2016 review through the identification and assessment of strategic parcels. Together these two studies provide a detailed picture of the character and role of the Green Belt and MOL as part of the evidence base for the emerging Local Plan.
5. Figure 1.2 illustrates the extent of the Green Belt within Croydon and its connection to the wider

Green Belt to the east, south and west, and the extent of MOL designated within the Borough.

6. The report is accompanied by three Appendices:

- ▶ Appendix 1 which sets out the detailed Green Belt and MOL Assessment, parcel-by-parcel.
- ▶ Appendix 2 which summarises the findings from adjacent Green Belt Reviews undertaken by Sutton Borough Council, Reigate & Banstead Borough Council and Tandridge District Council.
- ▶ Appendix 3 which illustrates the protected area constraints associated with land in the Borough.

Figure 1.2 The Green Belt and MOL within Croydon in Context



2. Assessment Methodology

2.1 Approach to the Assessment

Requirements

1. The starting point for the Assessment is the need to assess the whole Green Belt and MOL within the Local Plan area, which in this case is the entire Borough (and not just settlement edges). This enables a transparent approach to be adopted, the results of which will withstand scrutiny and can be readily combined with other elements of the evidence base for the Local Plan as required. The methodology needs to be flexible to allow for conclusions made at a strategic scale to inform locally-specific analysis, enabling the Council to justify its approach to land within the Green Belt and MOL.

Principles of the Assessment

2. To ensure that the Assessment is fit-for-purpose, the methodology:
 - ▶ Uses a logical approach toward parcel definition.
 - ▶ Incorporates the systematic testing of the Green Belt and MOL against NPPF (2012) purposes and London Plan criteria using a clear framework.
 - ▶ Is capable of reproducing similar results if applied by another party.
 - ▶ Is robust and defensible at Examination in Public of the Local Plan through a clear, logical approach which produces meaningful outputs.
 - ▶ Can produce results which are useful to plan and policy making as a key part of the evidence base for the Local Plan.
 - ▶ Ensures that there is broad comparability/compatibility with similar pieces of work undertaken in adjacent authorities as well as those around the country.
 - ▶ Assesses Green Belt Purposes and Metropolitan Open Land Criteria.
3. The NPPF (2019) (para. 134) sets out the following purposes for Green Belts:
 - ▶ to check the unrestricted sprawl of large built-up areas;
 - ▶ to prevent neighbouring towns merging into one another;
 - ▶ to assist in safeguarding the countryside from encroachment;
 - ▶ to preserve the setting and special character of historic towns; and
 - ▶ to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
4. The NPPF (2019) (para. 133) also notes the two 'essential characteristics' of Green Belts, that is 'their openness and their permanence'. Permanence is a planning consideration rather than a physical one. Nevertheless, it is recognised that there are benefits in using other features as Green Belt boundaries, where these are clearly defined on the ground and perform a physical and/or visual role in separating town and countryside. Although Green Belts might contain land which is of high quality and possibly

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recognised as a valued landscape, and land designated as being of nature conservation value, its purpose is not to protect such features (other policies address these aspects) but to keep land permanently open. Openness should not be confused with landscape character of that area.

5. The London Plan (March 2016, Policy 7.17) identifies the following criteria for the designation of MOL, which can be taken as specific qualities against which existing MOL can be assessed:
 - a. it contributes to the physical structure of London by being clearly distinguishable from the built-up area
 - b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
 - c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
 - d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.
6. The London Plan (Policy 7.17 and para 7.56) states that MOL should be treated equally to Green Belt. For assessment therefore, this means the application of both Green Belt purposes and MOL criteria (see section 2.3 below).

2.2 Land Parcel Definition and Analysis

7. The Assessment covers all the Green Belt and MOL across the Borough. As Green Belt and MOL boundaries do not always neatly follow administrative boundaries, the Assessment notes the relationship with the Green Belt in neighbouring authorities. Such an approach is consistent with the approach taken by studies undertaken in other authorities.
8. The Assessment uses parcels of land as survey units. There is a need to define these parcels at an appropriate scale so as not to produce potentially ambiguous or contradictory results. However, there is a balance to be struck between the number of parcels surveyed and the utility of the survey outputs; a small number of large parcels is as unhelpful as a large number of small parcels. In addition, conclusions drawn as part of the evaluation of the strategic contribution of the Green Belt and MOL will to some extent inevitably be different to localised purposes. Where necessary, following field survey, sub-parcels (for example down to the field scale) can be identified in order to help explore locally-specific issues and/or impacts.
9. Ordnance Survey maps and aerial photos were used to identify Green Belt and MOL parcels for assessment, using well-defined physical features, specifically:
 - ▶ Roads and rights of way of various scales, from rough tracks through to motorways.
 - ▶ A building line that provides a straight logical line and clearly represents the edge of the urban area.
 - ▶ A river, stream, ridge, car park, playground or other physical feature (such as a woodland edge or substantial hedge).
10. The parcels surveyed are shown in Figure 2.1. Green Belt and MOL parcels have been labelled separately and as far as possible (given restrictions on public access) the boundaries of the parcels were confirmed as part of the site visits.

Figure 2.1 Green Belt and MOL Parcels Surveyed (Overview)

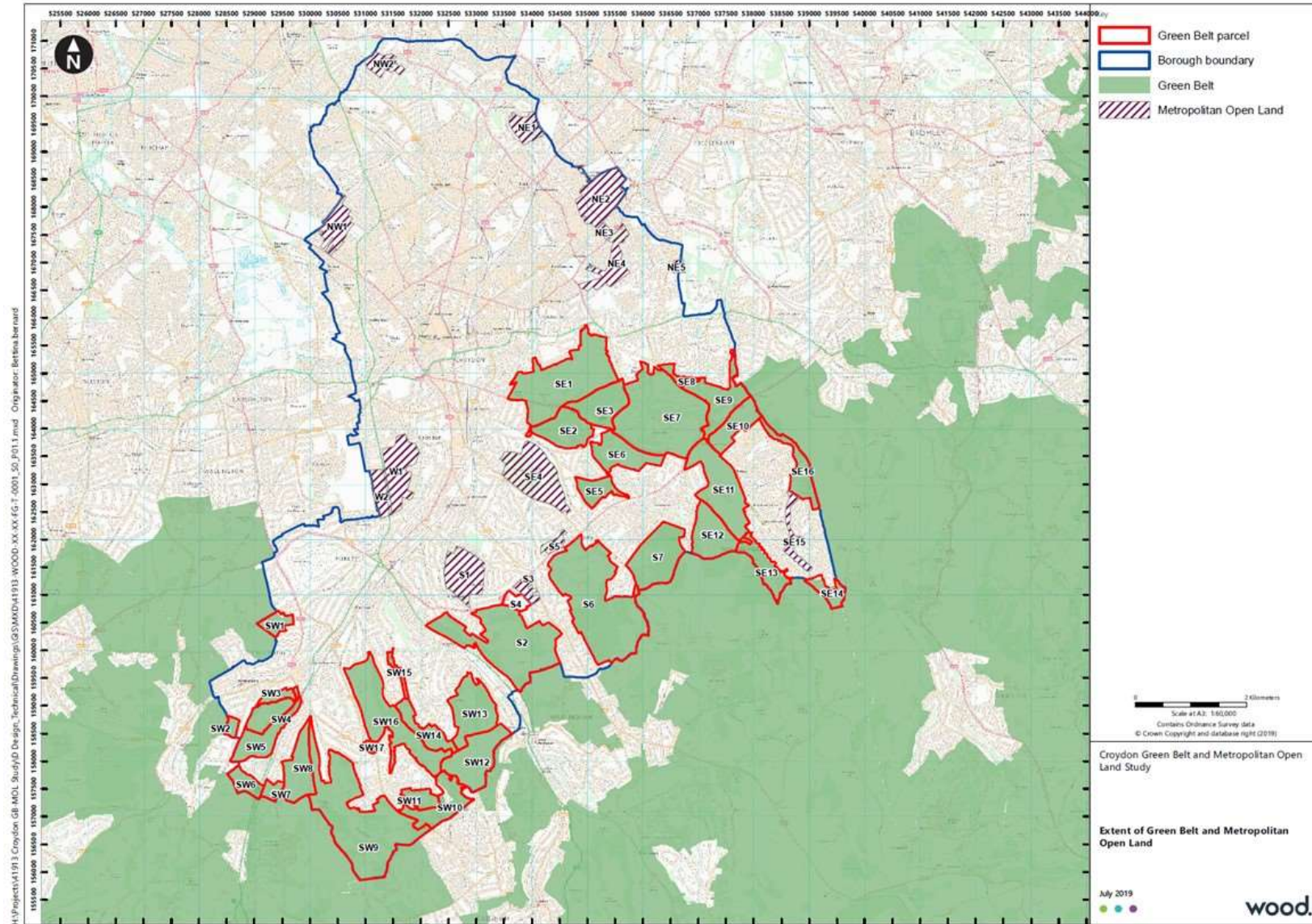


Figure 2.2 Green Belt and MOL Parcels Surveyed (North)

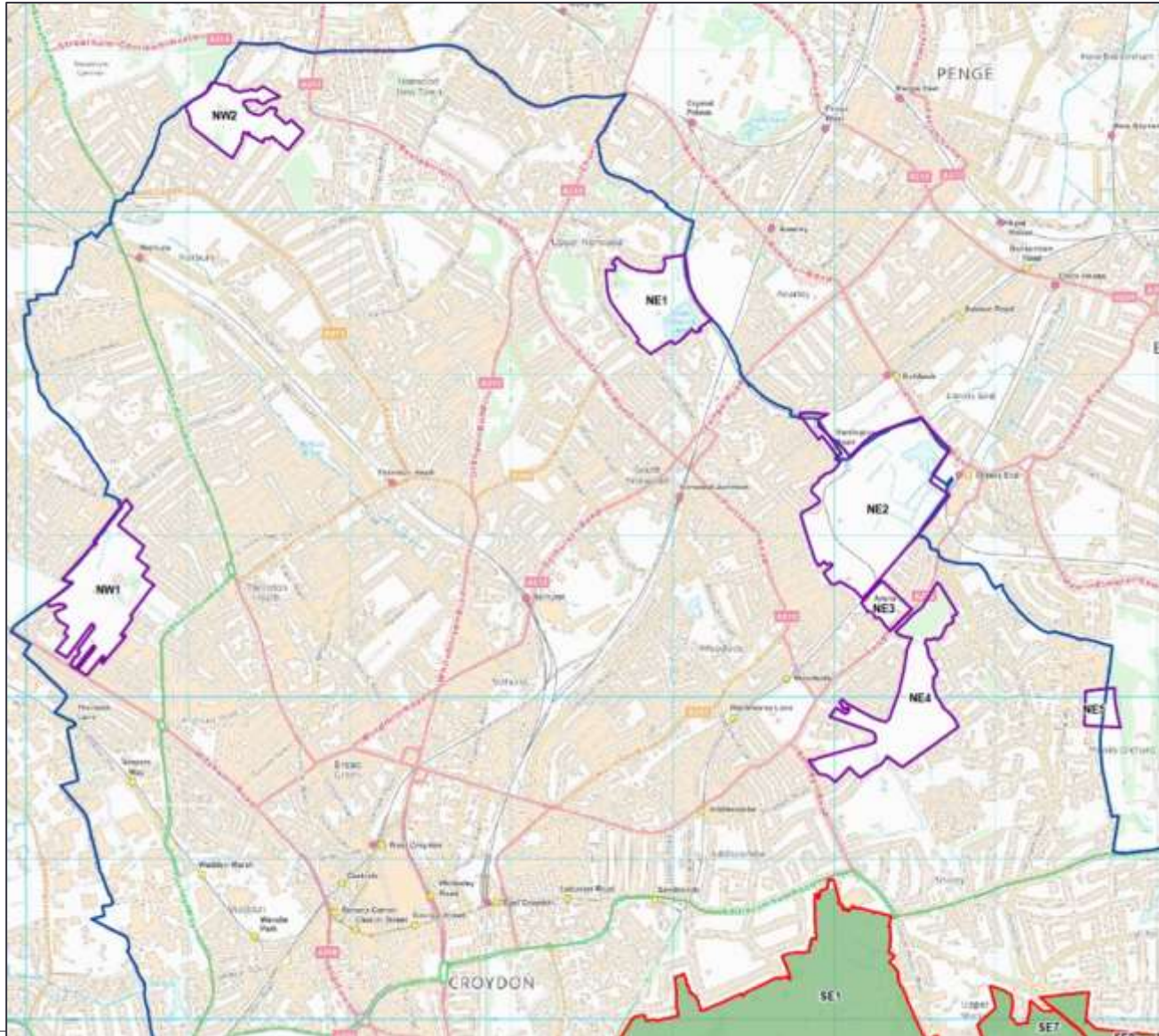


Figure 2.3 Green Belt and MOL Parcels Surveyed (Central)

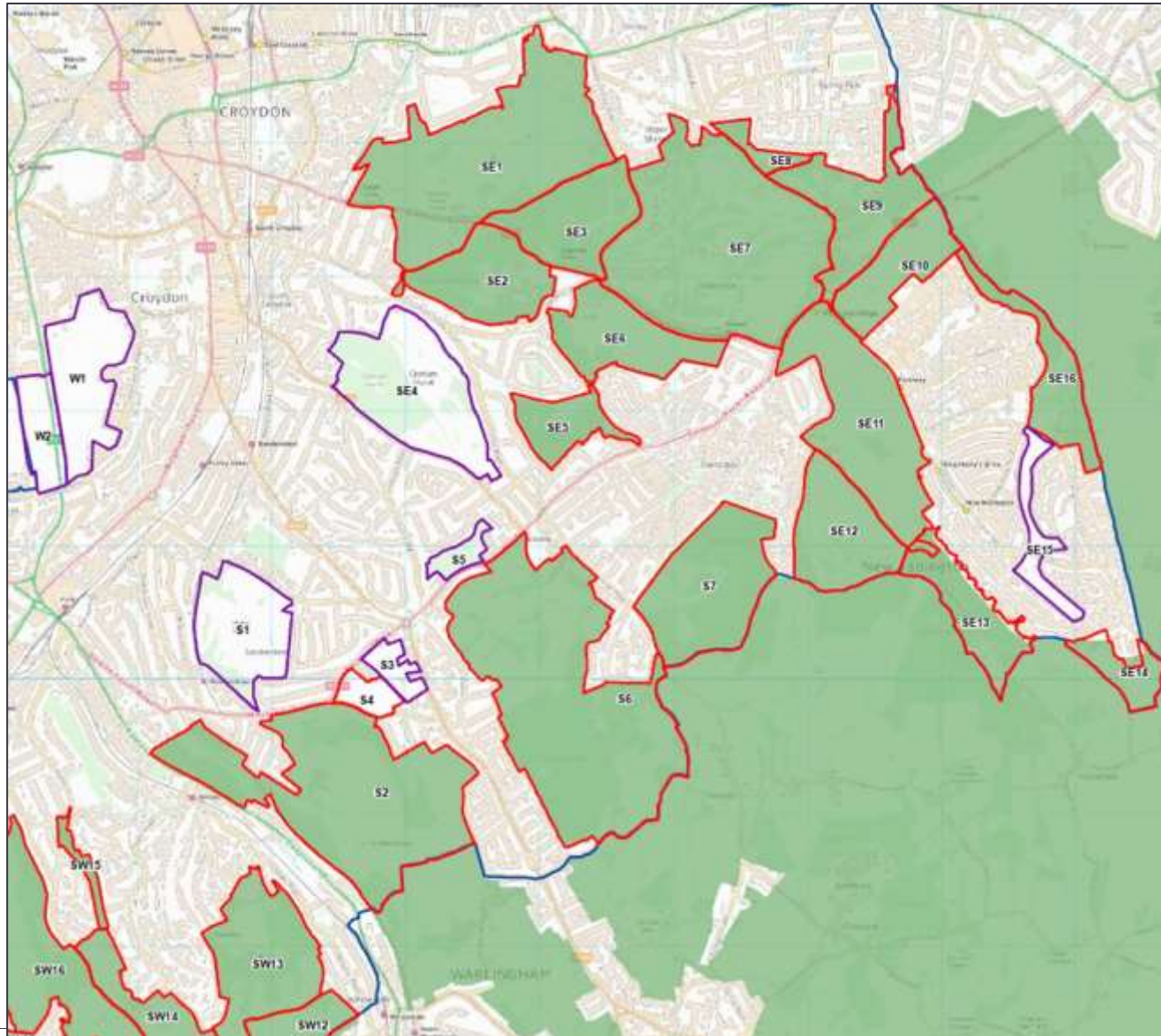
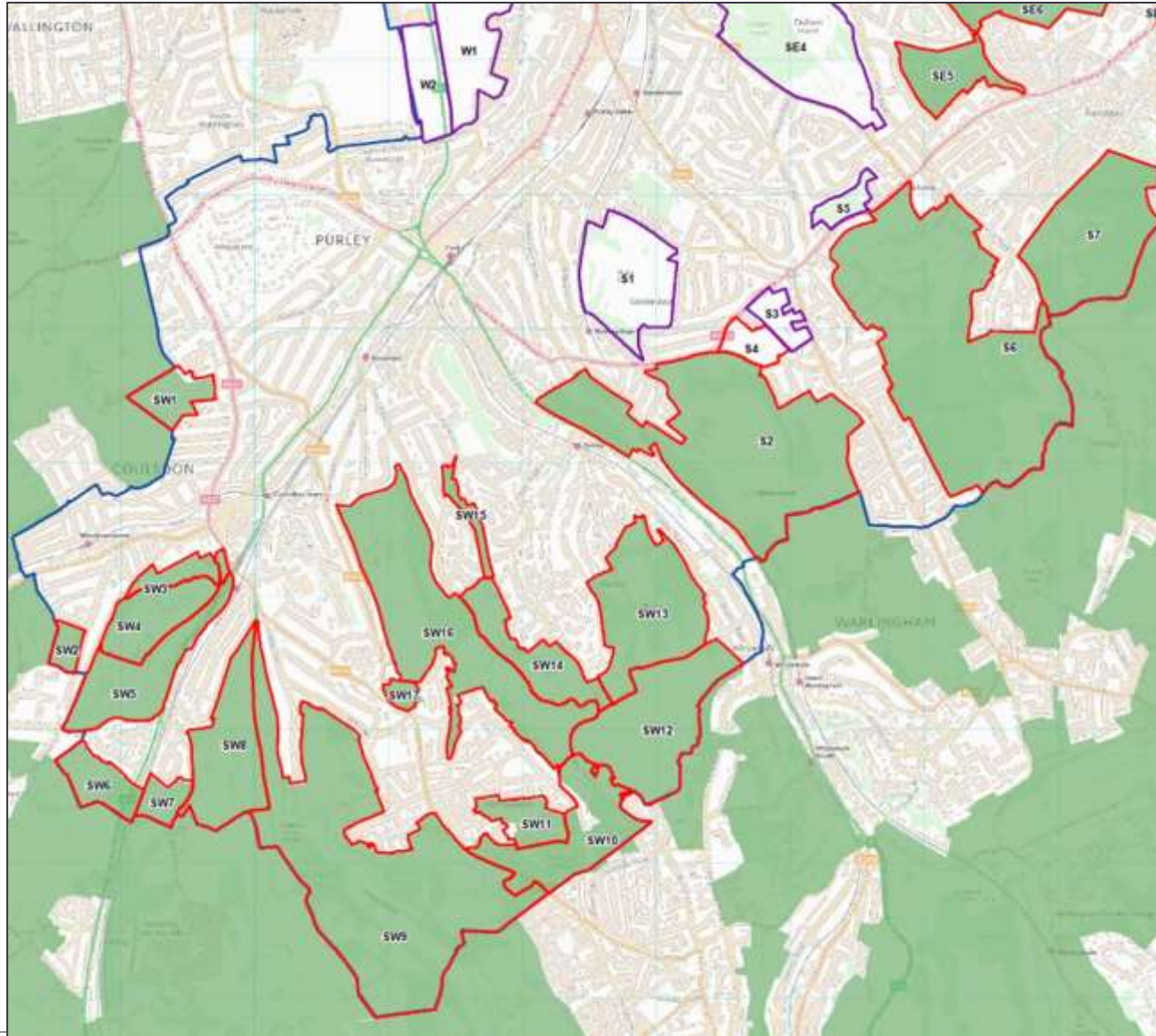


Figure 2.4 Green Belt and MOL Parcels Surveyed (South)



11. As part of establishing the basis for assessment against the purposes of Green Belt set out in the NPPF (2019) and for MOL against criteria set out in the London Plan, Table 2.1 defines the terms which have been applied in the Assessment.

Table 2.1 Definition of Terms Applied in the Assessment

Green Belt Purpose	Definition of Terms Applied in the Assessment
To check the unrestricted sprawl of large built-up areas	<p>Sprawl – spread out over a large area in an untidy or irregular way (Oxford Dictionary online). This includes Ribbon development which is development along a main road, especially one leading out of a town or village (Oxford Dictionary Online). This includes historical patterns of, or current pressures for, the spread of all forms of development along movement corridors, particularly major roads.</p> <p>Large built-up areas – in the context of this study these are: Croydon, Purley, Coulsdon, Sanderstead, Selsdon, Shirley, New Addington, Caterham and Warlingham (within Tandridge District).</p>
To prevent neighbouring towns from merging	<p>Neighbouring towns – this relates to: Caterham, Warlingham and Biggin Hill (all within Tandridge District).</p> <p>Merger/Coalescence – the physical or visual linking of two towns, settlements or areas of built form.</p> <p>Local Settlements – these are: Old Coulsdon, Kenley, Sanderstead, Selsdon, New Addington, Addington, Upper Shirley and Chipstead (within Reigate & Banstead Borough).</p>
To assist in safeguarding the countryside from encroachment	<p>Encroachment – a gradual advance beyond usual or acceptable limits (Oxford Dictionary online). The countryside – open land with an absence of built development and urbanising influences, and typically characterised by rural land uses including agriculture and forestry.</p> <p>Openness – absence of development or other urbanising elements (i.e. not openness in a landscape character sense which concerns topography and woodland/hedgerow cover).</p>
To preserve the setting and special character of historic towns	<p>Historic town – settlement or place with historic features identified in local policy or through a Conservation Area or other historic designation(s). There are Conservation Areas (and associated Listed Buildings) associated with Addington, Bradmore Green, Kenley Aerodrome, Norwood Grove.</p>
To assist in urban regeneration by encouraging the recycling of derelict and other urban land.	<p>Where development in open countryside is likely to render previously developed land in a particular vicinity less attractive to develop.</p>

2.3 Fieldwork and Assessment of Land Parcels

12. The fieldwork assessed each parcel in respect of its character (land use, degree of openness, relationship to the countryside, and relationship with historic centres) along with the robustness of the boundaries which define that parcel. The purpose of the Assessment is to consider the relative extent to which the land fulfils the purposes of Green Belt and MOL in light of the policies set out in the NPPF and the London Plan.
13. In the Assessment, consideration is given to both the strategic and local roles of the Green Belt and MOL generally and in the context of settlement edges, as well as positive uses of the Green Belt and MOL, as

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identified in the NPPF (para 141) and London Plan policy 7.17. The results of this exercise are recorded in a matrix which sets out comments on how each area performs against the Green Belt/MOL purposes.

14. Table 2.2 sets out the Assessment criteria which are used to assess the contribution of the parcels to Green Belt/MOL purposes; Table 2.3 the criteria for the assessment of openness and boundary quality; and Table 2.4 and Table 2.5 the criteria for the assessment of Green Belt purposes and MOL criteria respectively.

Table 2.2 Parcel Assessment Criteria

Topic	Assessment Criteria
NPPF Purposes of the Green Belt	
To check the unrestricted sprawl of large built up areas	Prevent the sprawl of a built-up area into open land where development would not otherwise be restricted by a permanent boundary. What is the role of the parcel in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?
To prevent neighbouring towns from merging into one another	Prevent development which would result in the merger or erosion of a gap (physically or visually) between settlements. What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?
To assist in safeguarding the countryside from encroachment	Protect the openness of the countryside and its perceived rurality. What is the role of the parcel in maintaining a sense of openness, particularly in light of proximity to a settlement edge?
To preserve the setting and special character of historic towns	Preserve the setting and character of historic town. What is the role of the parcel in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?
To assist in urban regeneration by encouraging the recycling of derelict and other urban land	Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically?
Overall Assessment of Contribution to Green Belt Purposes	In light of the assessment of individual purposes, what is the overall contribution of the parcel to the Green Belt, both individually and in a wider context?
Local Role of the Green Belt	
Preserving the setting and character of villages and other settlements	What is the relationship between a settlement and the surrounding Green Belt?
MOL Criteria (London Plan, Policy 7.17)	
Contributes to the physical structure of London	Is the parcel clearly distinguishable from the adjacent built-up area and thereby making a clear contribution to the physical structure of London?
Includes recreation and other facilities serving either the whole or significant parts of London	Does the parcel include sport, recreation, leisure and cultural facilities which are of strategic importance?

Topic	Assessment Criteria
Contains features of national or metropolitan value	Does the parcel contain features or landscapes (historic, recreational, biodiversity) which are of national or metropolitan value?
Is part of Green Infrastructure	Is the parcel part of a Green Chain ¹ or acts as a link in the network of Green Infrastructure?

Table 2.3 Criteria for the Assessment of Visual and Physical Openness and Boundary Quality

Visual Openness	High	Clear, middle and longer-distance views across the land.
	Mixed	Partially enclosed (e.g. by landform, vegetation or built form) but with views in/out.
	Low	Flat, surrounded by trees and vegetation.
Physical Openness	High	No built form or very limited urbanising influences.
	Mixed	Some built form, but not a defining feature.
	Low	Existing development and urban influences a prominent, defining element.
Quality of Boundaries	Strong	Prominent physical features (roads, railways, buildings/urban edge).
	Moderate	Less robust physical features (paths/tracks, watercourses, woodlands, hedgerows).
	Weak	No definable boundary on the ground.

Table 2.4 Assessment Criteria for Gradings against Green Belt Purposes

Purpose & Guide Question	Grading	Assessment Criteria
To check the unrestricted sprawl of large built-up areas <i>What is the role of the parcel in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	Significant Contribution	An extension of a built-up area which is not contained by substantial boundaries.
	Contribution	An extension of a built-up area with a degree of containment by substantial boundaries.
	Limited or No Contribution	Largely enclosed by existing development, strong containment and a limited relationship with the wider Green Belt.
To prevent neighbouring towns from merging into one another <i>What is the role of the parcel in preventing the merger of settlements which might occur</i>	Significant Contribution	Located within a gap between settlements which would be physically and/or visually compromised by development and which is unlikely to be able to be mitigated.
	Contribution	Located within a strategic or local gap which could be physically and/or visually compromised by development but could also be mitigated.

¹ Green Chains are closely related open spaces of land (or water), linked together with way-marked footpaths and other pedestrian routes. They may connect across borough boundaries. Green Corridors are near continuous areas of open space that link nature conservation sites and act as conduits for plants and animals and which might also serve amenity, landscape and access roles. The Thames is the major green corridor. Source: Thames Landscape Strategy (1994) Chapter 4.

Purpose & Guide Question	Grading	Assessment Criteria
<i>through a reduction in the distance between them?</i>	Limited or No Contribution	Not located within a strategic or local gap.
To assist in safeguarding the countryside from encroachment <i>What is the role of the parcel in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	Significant Contribution	Of open character, proximate to an urban edge, maintaining a clear distinction between town and country.
	Contribution	Of open character, detached or unrelated to an urban edge.
	Limited or No Contribution	Land is largely urbanised and/or has little or no relationship with the wider Green Belt.
To preserve the setting and special character of historic towns <i>What is the role of the parcel in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	Significant Contribution	Contains, or is directly adjacent to, a Conservation Area or other significant historic feature and contributes physically and/or visually to their setting.
	Contribution	In the vicinity of Conservation Area or other significant historic feature and partially contributes physically and/or visually to their setting.
	Limited or No Contribution	No relationship with a Conservation Area or other significant historic feature.
To assist in urban regeneration by encouraging the recycling of derelict and other urban land <i>Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically?</i>	Significant Contribution	Extensive tracts of derelict or underused land present.
	Contribution	Some evidence of derelict or underused land.
	Limited or No Contribution	No derelict or underused land present.
Overall Contribution <i>In light of the judgements made on individual purposes, what is the overall contribution of the parcel to the Green Belt?</i>	Significant Contribution	Makes a significant contribution to one or more Green Belt purposes, or an accumulation of contributions to purposes.
	Contribution	Makes a contribution to one or more Green Belt purposes.
	Limited or No Contribution	Makes a limited or no contribution to Green Belt purposes.

Table 2.5 Assessment Criteria for Gradings against MOL Criteria

MOL Criteria (London Plan, Policy 7.17)	Grading	Assessment Criteria
Contributes to the physical structure of London <i>Is the parcel clearly distinguishable from the adjacent built-up area and thereby making a clear contribution to the physical structure of London?</i>	Significant Contribution	Of a strong, readily identifiable identity
	Contribution	Of a moderate identity
	Limited or No Contribution	No clear identity
Includes recreation and other	Significant Contribution	Includes facilities of a significant scale or

facilities serving either the whole or significant parts of London <i>Does the parcel include sport, recreation, leisure and cultural facilities which are of strategic importance?</i>		particular importance
	Contribution	Includes facilities likely to be of more local importance
	Limited or No Contribution	Does not include facilities
Contains features of national or metropolitan value <i>Does the parcel contain features or landscapes (historic, recreational, biodiversity) which are of national or metropolitan value?</i>	Significant Contribution	Contains land designated as of national or metropolitan significance
	Contribution	Contains land designated as locally important
	Limited or No Contribution	No designations apply
Is part of Green Infrastructure <i>Is the parcel part of a Green Chain or acts as a link in the network of Green Infrastructure?</i>	Significant Contribution	Is clearly part of a Green Chain or Green Infrastructure link.
	Contribution	Contributes indirectly to Green Infrastructure.
	Limited or No Contribution	Makes no contribution to Green Infrastructure
Overall Contribution	Significant Contribution	Makes a significant contribution to one or more MOL criteria, or an accumulation of contributions.
	Contribution	Makes a contribution to one or more MOL criteria.
	Limited or No Contribution	Makes a limited or no contribution to MOL criteria.

15. A straightforward colouring system (see below) and accompanying commentary is used to set out the conclusions for each parcel and to produce maps which summarise the extent to which each parcel fulfils each Green Belt and MOL purpose and an overall assessment (a summary matrix and accompanying maps). This provides a simple tabular and graphical presentation of the contribution of land to the purposes of the Green Belt and MOL criteria.
16. None of the judgements on the relative contribution of the parcel to Green Belt purposes and MOL criteria are scored or weighted and the overall assessment reflects the professional judgement of the study team on the contribution of the parcel against individual purposes/criteria and overall. Thus a Significant Contribution in respect of a particular purpose, and a Limited or No Contribution in all other respects, can lead to an overall judgement of Significant Contribution reflecting the parcel's primary purpose. Equally, Contributions identified across a number of purposes may still only lead to a judgement of a Contribution overall.

The Colouring Assessment for Individual Green Belt Purposes and MOL Criteria

The parcel makes a **Significant Contribution** to a Green Belt purpose/MOL criteria clearly and unambiguously against the assessment criterion.



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The parcel makes a **Contribution** to a Green Belt purpose/MOL criteria against the assessment criterion, although this is not especially distinct in character and/or has been compromised by development.

The parcel makes a **Limited or No Contribution** to a Green Belt purpose/MOL criteria because of either performing no clear role in a particular location and/or has been compromised by development.

2.4 Reporting

17. This Report presents an analysis of the role of Green Belt and MOL within Croydon Borough, bringing together mapping, fieldwork and analysis, setting out the approach to the work undertaken, contextual material (such as the current stage of Plan-making and the outputs from Green Belt Reviews in adjacent authorities) [Sutton, Reigate & Banstead, Tandridge and Bromley] and analysis of the study outputs, including conclusions.
18. Colour-coded maps illustrate professional judgement of the contribution of each parcel to five purposes of Green Belt, as well as an overall assessment of each parcel's contribution to Green Belt. This provides a clear summary, in light of individual purposes, of the patterns of relative contribution. The Assessment does not consider specific parcels in terms of their suitability for development.

2.5 Consultation and the Duty to Co-operate Statement

19. In order to help promote good planning and fulfil the obligations of the Duty to Co-operate, interested parties were consulted on the study methodology prior to its commencement. Table 2.6 details the organisations who were consulted between 31st May 2019 and 12th June 2019. Responses to the consultation are set out in Table 2.7, along with the response of the consultant team.

Table 2.6 Organisations Consulted on the Green Belt Review Methodology

Greater London Authority	Southwark Borough Council
Lambeth Borough Council	Merton Borough Council
Reigate & Banstead Borough Council	Bromley Borough Council
Sutton Borough Council	Tandridge District Council
Wandsworth Borough Council	Surrey County Council

Table 2.7 Responses to the Consultation on the Green Belt Review Methodology

Tandridge District Council	Wood Response
I can confirm that Tandridge developed a methodology in 2015 and has completed its study, which is in 3 parts; all of which is available to view on our website: https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Evidence%20base%20and%20technical%20studies/Green-Belt-Assessment-Methodology-2015.pdf	

Land parcel definition and analysis

The approach of considering the entirety of the Green Belt is noted and reflects Tandridge's own approach. However, whilst it is acknowledged that parcel boundaries may not always neatly follow administrative boundaries, it is noted that the methodology proposes consideration of small parts of neighbouring authorities' Green Belt. Please note that in assessing the Green Belt, Tandridge only assessed that located within its administrative boundaries. However, our methodology sets out that where a parcel abutted the District boundary, officers may use vantage points from other areas to consider its wider context and through its strategic assessment Tandridge considered how its broad strategic role interacted with the wider Green Belt.

In terms of use of parcels as survey units, Tandridge agrees that defining these effectively, including at an appropriate size, is an essential part of the process.

Tandridge also agrees with the approach of considering the Green Belt at a strategic level and at a more detailed level. However, it is unclear from the methodology whether it will be undertaken at a strategic level and a more detailed level across the entirety of the Green Belt, or whether the more detailed/localised assessment is only 'where necessary'.

Site visits and assessment of land parcels

In relation to boundaries, Tandridge found it useful to apply a hierarchy with those which form a clear physical boundary and with an assurance of permanence, at the top. It is noted that your approach includes ownership boundaries, however this may not always be clear on the ground and might not allow for the establishment and understanding of permanent boundaries, nor the interaction between parcels.

In terms of the purposes, it is noted that the methodology is considering the Green Belt in relation to both the purposes set out in the NPPF but also includes a local purpose. Tandridge in its approach only considered the national purposes however local interpretation and how they apply at a local level were considered essential.

Under Purpose and Guiding Question, there is no reference to purpose 5. Tandridge's approach, based on the difficulties with assessing this purpose, was to not assess parcels against it as part of the Green Belt Assessment process – see paras 3.35 and 3.36. However, it is noted that under Parcel Assessment Criteria, this is the only purpose where the parcels would be assessed in concert with other parcels.

Tandridge notes the use of a colouring system and whilst our methodology originally proposed such an approach, Tandridge ultimately concluded that this confused the outcome of the Green Belt Assessment and removed it – see Green Belt Assessment December 2015.

Definitions

Definition of 'historic town' includes settlements or places with historic features, which reads as if settlements or places which contain listed buildings, but which are not otherwise a heritage area, would be considered. Tandridge considered listed buildings in relation to this but concluded that this purpose relates to a larger built form than individual buildings. It may be beneficial to use a local application because that purpose was intended for use for places like York.

Noted – the relationship between the GB in Croydon and Tandridge is inseparable as the objective of the containment of the outer suburbs of London is the same for both authorities.

Noted – the combination of Wood's strategic parcels and those of the 2016 analysis provides a manageable and informative survey base.

The methodology states that there are localised matters such as the role of GB in providing the context for Conservation Areas and its role in protecting the identity of individual settlements. A mixture of strategic and localised assessment has been found to be helpful in past studies and not challenged. A purely strategic perspective can yield unhelpful results which do not reflect the role of GB as a place-specific policy instrument.

Agreed – reference to land ownership should be deleted.

Noted – see response above.

Noted – this omission will be corrected.

Wood has found the colouring assessment to be a helpful visual guide from which strategic judgements can be formed (i.e. the role of the GB as a whole and the interrelationship between parcels) and the starting point for more detailed analysis if required.

Noted – this is one of the more challenging GB purposes which was indeed designed for towns such as York, Oxford and Cambridge, but which through the use of proxies such as Conservation Areas can be used positively to add local context to a strategic picture. Ignoring the purpose altogether, which would be the case for 90% of GB reviews if used in the sense of genuinely historic towns and their context, seems unnecessarily restrictive and would ignore a GB role

which can be relatively easily recognised on the ground. As long as the methodology states the application of this approach, then the analysis stands.

Reigate & Banstead Borough Council

Our current Green Belt Review evidence was undertaken in two stages. The first was a broad strategic review of the Green Belt around the edges of built up areas: this was contained within the "Sustainable Urban Extensions" report in November 2012 to inform our Core Strategy. A second, more detailed review was undertaken to inform our Development Management Plan. This second stage considered individual land parcels but was geographically limited to only those broad areas for growth already identified within the Core Strategy. It is not therefore a full, borough-wide Green Belt Review.

Noted

Having reviewed your proposed methodology, we consider that it is broadly similar to, and compatible with, the approach that is adopted in our Green Belt Review. However, it should be noted that – as our studies were undertaken based on the 2012 NPPF – they did not include consideration of opportunities to offset impact of removing land from the Green Belt through improvements to environmental quality and accessibility of remaining Green Belt land.

Noted

We broadly support the proposed assessment methodology, including the approach to definition of parcels, the use of site visits and other resources (as listed), and the questions proposed to assess against each criteria. We would however request that – as it is your intention to look over administrative boundaries – you consider identifying and including towns and built up areas within adjoining areas within the definitions set out under Section 6 to ensure that any cross-boundary contributions made by a parcel of land in Croydon are fully assessed. We would be happy to input into this identification process.

Cross-boundary relationships between Green Belt within Croydon and Reigate & Banstead are noted where appropriate.

We note that the study may review "small parts" of neighbouring authorities Green Belt. Whilst acknowledging that clear "defensible" boundaries will not always coincide with administrative borough boundaries, we have some reservations about Croydon's Green Belt Review assessing land in Reigate & Banstead borough.

The study does not assess the Green Belt within Reigate & Banstead Borough, but where appropriate notes the relationship between the Green Belt within the respective authorities in terms of boundary definition.

We have recently commenced a review of our Core Strategy 2014, which we intend to prepare along the dates set out in our February 2019 Local Development Scheme (LDS). This is likely to include carrying out a full, borough-wide Green Belt Review. Given our own study has not yet commenced and as yours is not a jointly commissioned study, we are concerned to ensure that findings which Croydon may reach in relation to Green Belt in Reigate & Banstead do not prejudice our own future evidence and conclusions.

Please see response above. The results of the Croydon study will not prejudice the findings of adjacent studies, although some professional judgements may differ.

Should you decide to proceed with inclusion of land within our borough in your study, we would therefore request that you continue to engage closely with us through the duty to cooperate as the study develops, including specifically in relation to the following: - We would wish to review and agree the land parcel boundaries within Reigate & Banstead before assessment of parcels commences, to ensure that any overlap into our borough is the minimum necessary to enable a robust assessment and so that it does not prejudice how we may define parcels in our own future studies - We would expect to have the opportunity to input into, or at the very least, to review and comment on any draft conclusions about the Green Belt contribution of any parcels that include land within our borough before they are published or shared elsewhere. With

The assessment does not include land within Reigate & Banstead Borough beyond noting the physical and visual connection between the Green Belt. The draft report will be shared for comment.



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regards to these requirements, we note your timetable is to publish your study this summer.



3. Strategic Assessment of the Green Belt and Metropolitan Open Land

3.1 The character of the Green Belt and Metropolitan Open Land in Croydon

1. Across its southern arc, the physical geography of the Green Belt is varied, dominated by ridge and valley topography but also including substantial flatter areas, part of the transition to the North Downs to the south. Built form has to some degree followed the topography with linear extensions of suburbs separated by higher areas left free from development. In some cases, these areas extend deep into the urban area (as at Farthing Downs, Old Coulsdon, Riddlesdown, Purley Downs, Croham Hurst, and Addington, for example).
2. Dense woodland is a common land use, some remnant from past activity, some replanting and/or associated with the significant number and size of golf courses arranged across the southern extent of the Borough. There are large tracts of common land (Farthing Downs, Coulsdon Common and Kenley Common), owned by the City of London comprising a matrix of woodland and grassland, much of which has open access. There is relatively little farmland, and the notion of open countryside often assumes a place-specific quality. There is limited evidence of typical urban fringe land (such as 'horsiculture', fly-tipping or marginal farming), in contrast to what is generally a clear division (albeit often unbounded) between the built edge and open land. These areas can often be vulnerable to erosion as a result of their size and configuration, particularly when the nature of the built edges is examined, many of which are not contained by any significant boundary, with back gardens abutting open land. This is important because of the potential vulnerability of these edges to incremental extension.
3. The Green Belt in Croydon is the inner edge of the Metropolitan Green Belt and is shared in function with that within Sutton Borough, Reigate & Banstead Borough, Tandridge District and Bromley Borough. In many instances, the Green Belt within Croydon effectively contains the suburban development. Notwithstanding proximity to extensive and often unbroken built-up areas associated with Croydon and its suburbs, a general sense of openness (that is the broad absence of built development) within this open land has been maintained. Despite some evidence of incremental change associated with land use change (notably to equestrian enterprises), the condition of the landscape appears to be good, with a reasonably strong character with strong, well maintained hedgerows and woodland boundaries. There is no evidence of dereliction or abandonment.
4. Retention of the general sense of openness (in a physical and visual sense) across the Green Belt reflects (to a greater or lesser degree) the consistent application of Green Belt policy which has prevented the further occurrence of uncontained development, particularly in the vicinity of main roads. The division between 'town and country' generally being clear, albeit often part of a complex urban edge where there is an interweaving of dense suburban development and open land. The rapid pre-war and immediate post-war expansion of the suburbs of Coulsdon, Purley, Kenley, Sanderstead, Selsdon, New Addington and Shirley has been largely checked by Green Belt policy, leaving relatively dense built form adjacent to open countryside, often with little transition between them.
5. Metropolitan Open Land within the Borough is relatively modest in extent, typically being land which is smaller in scale than Green Belt but of more strategic importance than local open spaces. This land helps to structure the urban area, maintain a sense of openness between dense tracts of suburban housing, provide essential recreational space, protect nature conservation interests, and define local character. The complexity of land use across MOL reflects its geography, history and significance as community

assets. Thus sport and recreation (and associated buildings), both public and private access, form a significant proportion of land uses along with extensive tracts of land designated as being of nature conservation value. The majority of the land is managed to a greater or lesser degree, with limited evidence of dereliction or abandonment.

6. The diverse roles of this Green Infrastructure are recognised in the London Plan and is part of the specific policy criteria² applied to such land, in addition to being treated as the equivalent of Green Belt (Policy 7.17). Typically, MOL hosts strategic recreational routes (walking and/or cycling) and in some cases are of nature conservation importance. For example, the All London Green Grid³ identifies various strategic links which make use of MOL to add to their variety of character, such as the Water Link through South Norwood Country Park, in turn being part of a chain of Green Belt land extending southwards to Selsdon.

3.2 Assessment Against Green Belt Purposes and Metropolitan Open Land Criteria

7. The assessment of the extent to which Green Belt and MOL meets the purposes set for these designations is illustrated in Figures 3.1 and 3.2 and Table 3.1. In summary, they demonstrate that the vast majority of the Green Belt and MOL fulfils the purposes set for it. Clearly there is significant diversity amongst the contribution made to individual purposes and amongst the fulfilment of MOL criteria, but the broad pattern is clear, including extensive areas making a Significant Contribution overall, often reflecting a specific purpose, but also their accumulation (particularly in the case of MOL).
8. Appendix A sets out the detailed assessment of each parcel. All 46 parcels (both Green Belt and MOL) have been assessed against Green Belt purposes, reflecting the direction in the London Plan (Policy 7.17) that MOL should be given the same protection as Green Belt land. As such, and set out in the methodology for this assessment, there is consequently a need to test MOL land against Green Belt purposes and MOL criteria. To ensure consistency and reflecting the often multifunctional character of the Green Belt proximate to the built edge of extensive suburban areas, Green Belt parcels are also tested against MOL criteria. In order to ensure that localised roles are identified and to capture their wider role within the London Plan.

² MOL criteria (London Plan, Policy 7.17):

- Contributes to the physical structure of London by being clearly distinguishable from the built-up area
- Includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
- Forms part of a Green Chain or a link in the network of green infrastructure

³ Mayor of London (March 2012) **Green Infrastructure and Open Environments: The All London Green Grid**



Figure 3.1 Overall Contribution to Green Belt Purposes



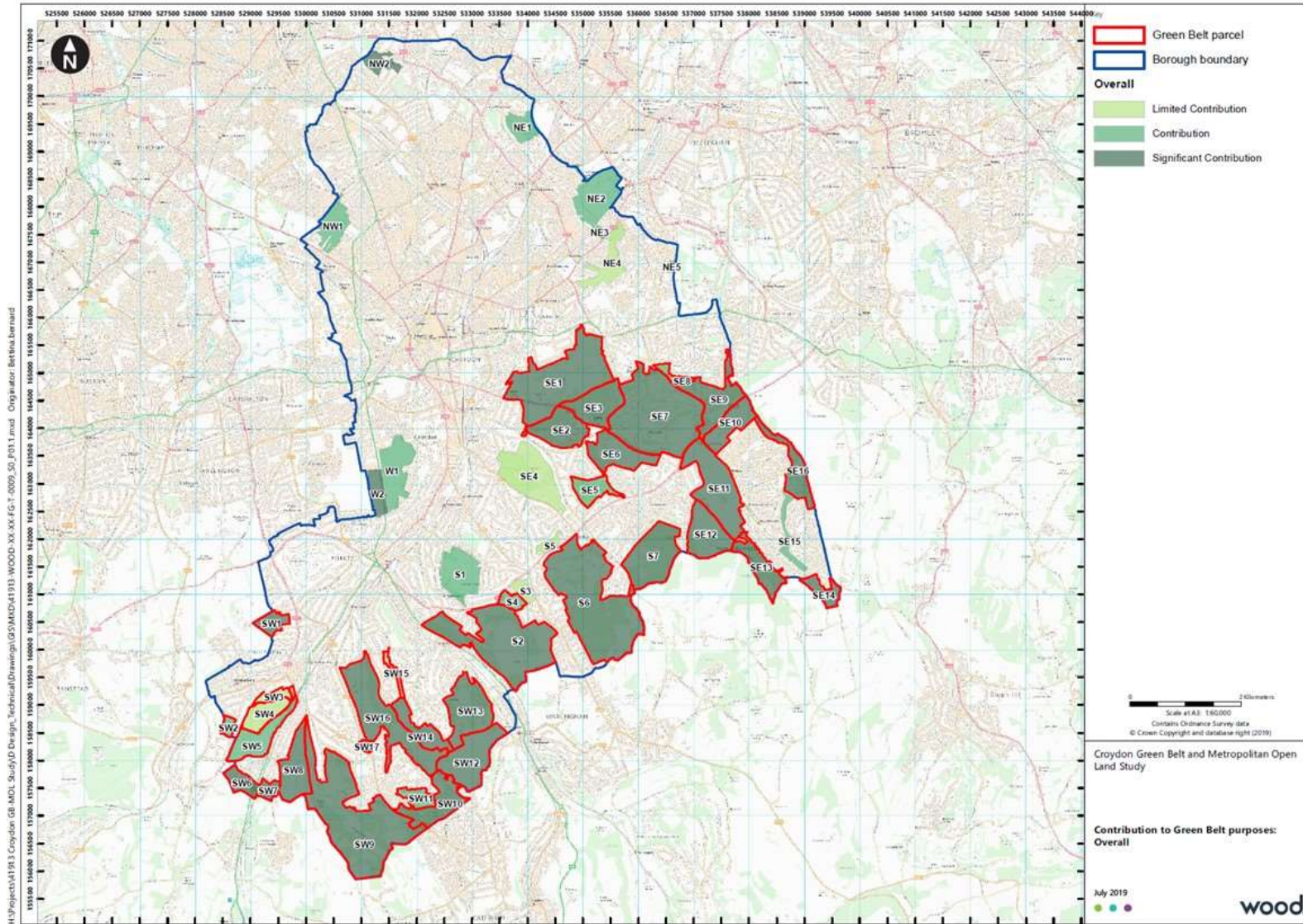


Figure 3.2 Overall Contribution to Metropolitan Open Land Criteria

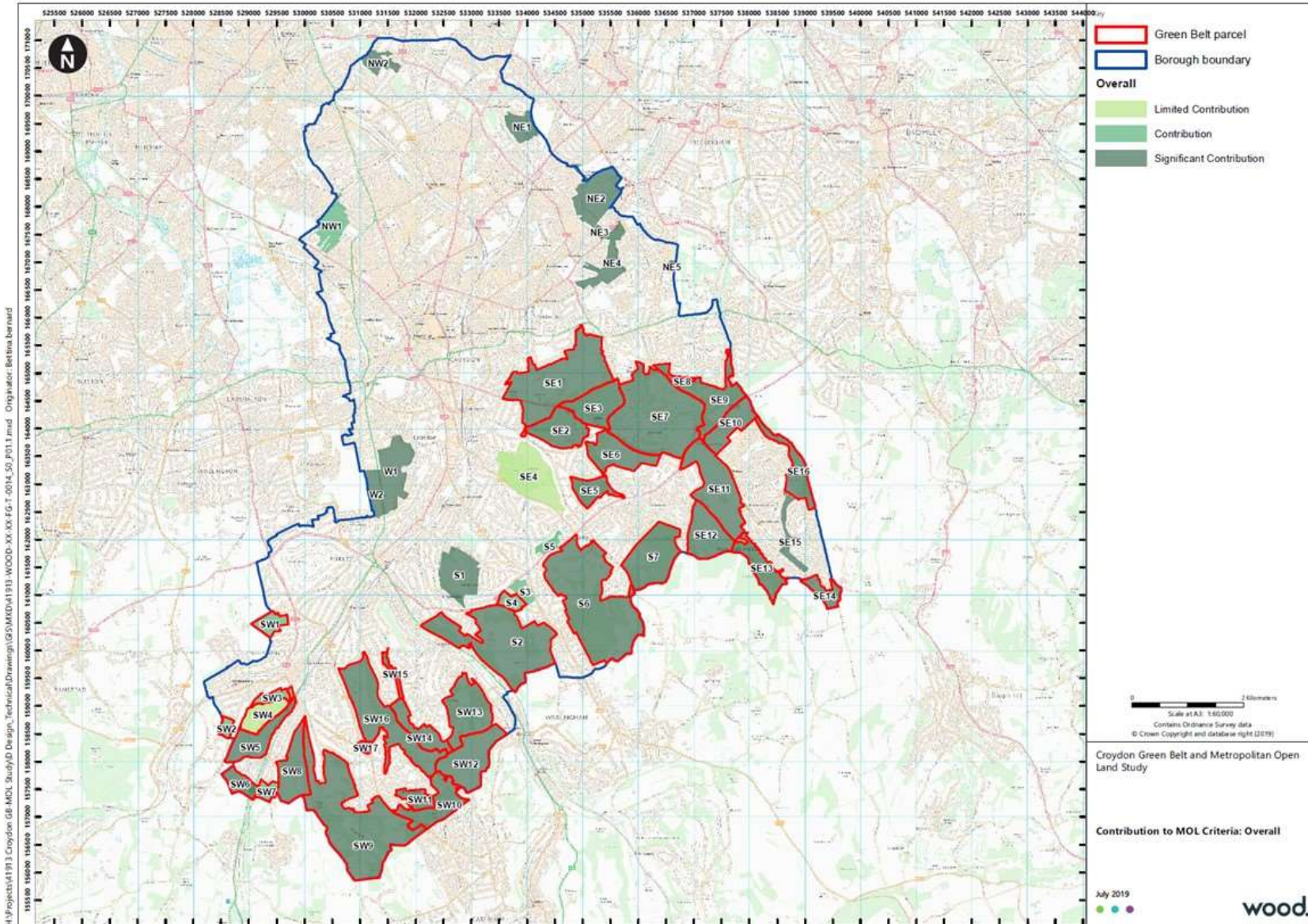


Table 3.1 Assessment of Contribution to Green Belt and Metropolitan Open Land Criteria (see Appendix A for detailed parcel-by-parcel assessment)

Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
W1	Purley Way Playing Fields, South Croydon	MOL	C	C	LC	LC	LC	C	The scale and location of the parcel means that it serves to maintain a high degree of openness in the locality, preventing further sprawl and maintaining separation, in combination with land to the west of the A23.	SC	LC	LC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its structural role in maintaining openness within a densely built-up area and being part of the ALGG.
W2	Land to the west of Purley Way, South Croydon	MOL	C	C	C	LC	LC	C	The scale and location of the parcel means that it serves to maintain a high degree of openness in the locality, preventing further sprawl and maintaining separation, in combination with land to the east of the A23.	SC	LC	LC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its structural role in maintaining openness within a densely built-up area and being part of the ALGG.
NW1	Croydon Cemetery, Thornton Heath	MOL	LC	LC	LC	LC	LC	LC	The scale and location of the parcel means that whilst it maintains a degree of openness in the locality, its Green Belt role is limited.	C	SC	LC	C	SC	The parcel makes a Significant Contribution to MOL purposes, reflecting its principal role as a cemetery but also qualities of openness which contribute to the structure of London and its GI network.

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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
NW2	Norwood Grove, Upper Norwood	MOL	LC	C	C	SC	LC	SC	Whilst the parcel is enclosed and situated within a densely built-up suburban area, the land nevertheless maintains an open character as informal parkland and is part of wider open land to the west (Streatham Common).	SC	SC	SC	SC	SC	The parcel makes a Significant Contribution to MOL purposes, reflecting its role as open land within a densely built-up suburban area, the presence of strategic recreational facilities, its heritage role and as part of the ALGG.
NE1	South Norwood Lake	MOL	LC	LC	C	LC	LC	C	Whilst the parcel is enclosed and situated within a densely built-up suburban area, the land nevertheless maintains an open character as informal parkland.	C	SC	C	SC	SC	The parcel makes a Significant Contribution to MOL purposes, reflecting its role as open land within a densely built-up suburban area, connection with wider open land to the east, the presence of strategic recreational facilities, a nature conservation role and role as part of the ALGG.
NE2	South Norwood Country Park	MOL	LC	LC	C	LC	LC	C	The parcel makes a Contribution in respect of the retention of remnant open countryside character which is of particular value in a densely built-up area.	SC	SC	SC	SC	SC	The parcel is of strategic importance in respect of its structural, recreation and nature conservation roles, as well as being part of strategic GI links of the ALGG.
NE3	Land off Long Lane,	MOL	LC	LC	LC	LC	LC	LC	The parcel makes No Contribution overall, reflecting its size, highly enclosed character and separation	LC	LC	LC	C	C	The parcel's role as MOL is limited to its potential role as part of a strategic corridor within the ALGG. The precise



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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
	South Norwood								from wider land to the northwest and southeast.						nature of this role would have to be determined separately.
NE4	Ashburton Playing Fields, Shirley Oaks	MOL	LC	LC	C	LC	LC	C	The scale and location of the parcel maintains a high degree of openness in the locality and a Contribution to Green Belt purposes through preventing encroachment.	C	C	LC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its role as part of the ALGG, as well as having a role in maintaining openness within a densely built-up area.
NE5	Land off Overstone Gardens, Monks Orchard	MOL	LC	LC	LC	LC	LC	LC	The scale and location of the parcel means that whilst it maintains a degree of openness in the locality, its Green Belt role is limited.	LC	LC	LC	LC	LC	The parcel makes a Limited Contribution to MOL purposes but nevertheless is part of local openness within a densely built-up area.
SE1	Land to the Northeast of the A212, Shirley	Green Belt	SC	LC	SC	LC	LC	SC	The parcel, despite having diverse land uses, maintains a high degree of openness and countryside character, preventing encroachment into this open land and containing the urban edge of Shirley.	SC	LC	SC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its structural role in maintaining openness, its nature conservation and recreational role and being part of the ALGG.
SE2	Land to the southwest of the A212 Coombe Road	Green Belt	SC	C	C	LC	LC	SC	The parcel makes a Significant Contribution to Green Belt purposes primarily through its role in preventing further sprawl along the A212, but also in maintaining	C	LC	SC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its structural role in maintaining openness, its nature

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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
									openness through preventing encroachment and merger of settlements.						conservation and recreational role and being part of the ALGG.
SE3	Addington Hills (Shirley Hills Woods)	Green Belt	SC	C	C	LC	LC	SC	The parcel makes a Significant Contribution to Green Belt purposes primarily through its role in combination with adjacent parcels in preventing further sprawl along the A212, as well as in maintaining openness through preventing encroachment and merger of settlements.	SC	SC	SC	SC	SC	The parcel makes a Significant Contribution to all MOL purposes reflecting its structural role in maintaining openness, its nature conservation and recreational role and being part of the ALGG.
SE4	Land at Croham Hurst	MOL	C	C	C	LC	LC	C	The parcel maintains a degree of openness and countryside character which is locally important.	SC	SC	SC	SC	SC	The parcel makes a Significant Contribution to all MOL purposes reflecting its structural role in maintaining openness, its nature conservation and recreational role and being part of the ALGG.
SE5	Littleheath Woods, Addington	Green Belt	LC	LC	C	LC	LC	C	The parcel maintains a degree of openness and countryside character which is locally important.	C	C	SC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting, its nature conservation and recreational role and being part of the ALGG, whilst also contributing locally to



Parcel	Location	Designation	Green Belt Contribution							MOL Contribution						
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary	
																physical structure and recreational opportunity.
SE6	Land at Heathfield, Addington	Green Belt	SC	C	C	LC	LC	SC	The parcel prevents the further sprawl of development along the A212 and helps to maintain a degree of openness and countryside character.	C	LC	C	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting, its nature conservation and recreational role and being part of the ALGG, whilst also contributing locally to physical structure and recreational opportunity.	
SE7	Land at Upper Shirley, north of the A212	Green Belt	SC	C	SC	SC	LC	SC	The parcel makes a Significant Contribution to maintaining openness and countryside character through the prevention of further sprawl and encroachment, whilst also providing the context for a Conservation Area.	SC	C	SC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting, its structural and nature conservation roles and being part of the ALGG.	
SE8	Land between Shirley Church Road and Spring Park	Green Belt	C	LC	C	LC	LC	C	The parcel makes a Contribution to Green Belt purposes through its localised role in preventing sprawl and encroachment, but also acting in combination with land to the south.	LC	C	SC	C	SC	The parcel makes a Significant Contribution to MOL purposes reflecting the presence of the London Loop along its southern boundary and localised role in providing informal access woodland and a GI function.	

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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
SE9	Land between Addington and Spring Park	Green Belt	SC	SC	SC	SC	LC	SC	The parcel makes a Significant Contribution to Green Belt purposes through role in preventing further sprawl and encroachment as well as acting as the context for Addington Village.	SC	C	SC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its structural role, the presence of the London Loop along its southern boundary and its nature conservation role.
SE10	Land between Addington and New Addington	Green Belt	C	C	SC	SC	LC	SC	The parcel makes a Significant Contribution to Green Belt purposes through its role in preventing encroachment as well as acting as the context for Addington Village.	SC	LC	LC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its structural role, and function as part of Strategic Corridor within the ALGG.
SE11	Land between Selsdon (Forestdale) and New Addington	Green Belt	SC	SC	SC	C	LC	SC	The parcel makes a Significant Contribution to Green Belt purposes through role in preventing sprawl and encroachment and maintaining separation, as well as acting as part of the context for Addington Village.	SC	LC	LC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its structural role, and function as part of Strategic Corridor within the ALGG.
SE12	Land to the southeast of Forestdale	Green Belt	SC	SC	SC	LC	LC	SC	The parcel makes a Significant Contribution to Green Belt purposes through role in preventing sprawl and encroachment and maintaining separation.	SC	LC	C	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its structural role and function as part of Strategic Corridor within the ALGG.

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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
SE13	Land to the southwest of New Addington	Green Belt	SC	SC	SC	LC	LC	SC	The parcel makes a Significant Contribution to Green Belt purposes through its role in preventing sprawl and encroachment and maintaining separation. The parcel acts in combination with Green Belt in Tandridge District.	SC	LC	C	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its structural role and function as part of Strategic Corridor within the ALGG.
SE14	Land to south of Fairchilds Avenue/King Henry's Drive, New Addington	Green Belt	SC	LC	SC	LC	LC	SC	The parcel makes a Significant Contribution to Green Belt purposes through its role in preventing sprawl and encroachment into open countryside in combination with Green Belt in Tandridge District and Bromley Borough.	LC	LC	LC	SC	SC	The parcel makes a Significant Contribution to MOL purposes reflecting its function as part of Strategic Corridor within the ALGG.
SE15	Land to the north and south of Arnhem Drive, New Addington	MOL	LC	LC	LC	LC	LC	LC	The parcel plays no clear Green Belt role, being amenity grassland and pitches enclosed within an urban environment.	C	LC	LC	LC	C	The parcel makes a Contribution to MOL purposes by virtue of its scale and thus structuring role and importance for local amenity.
SE16	Land to the northeast of King Henry's	Green Belt	SC	C	SC	LC	LC	SC	The parcel contains the eastern edge of New Addington, preventing sprawl into open countryside and, in conjunction with Green Belt in	C	LC	SC	LC	SC	The parcel makes a Significant Contribution to MOL purposes because

Parcel	Location	Designation	Green Belt Contribution							MOL Contribution						
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary	
	Drive, New Addington									Bromley Borough, the incremental encroachment into open countryside, as well as helping to maintain the gap between New Addington and Coney Hall.						of its nature conservation role, as well as structuring and local amenity roles.
S1	Purley Downs Golf Course	MOL	SC	C	C	C	LC	SC		The parcel is an important part of remaining open land in this locality, containing adjacent suburban development, separating suburban areas and offering a sense of openness in a densely built-up area.	C	LC	SC	C	SC	The parcel's structural role and nature conservation function means that it makes a Significant Contribution to MOL purposes overall.
S2	Land at Riddeldown, between Kenley, Purley and Sanderstead	Green Belt	SC	SC	SC	LC	LC	SC		The parcel makes a Significant Contribution to Green Belt purposes, preventing the further sprawl of development from the suburbs of Sanderstead and Purley as well as maintaining openness between Kenley, Purley and Sanderstead.	SC	LC	SC	SC	SC	The parcel's size and strategic location, nature conservation and recreational function means that it makes a Significant Contribution to MOL purposes overall.
S3	Sanderstead Recreation Ground, Limpsfield Road	MOL	LC	LC	LC	LC	LC	LC		Given the enclosed character of the parcel and its role as part of the urban envelope of Sanderstead, the land makes only a Limited Contribution to Green Belt purposes.	C	C	C	LC	C	The parcel is of local importance in respect of providing character, openness and facilities within Sanderstead.

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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
S4	Land off Borrowdale Drive, Sanderstead	Green Belt	C	LC	C	LC	LC	C	Whilst the parcel is bounded on all sides and part of the footprint of Sanderstead, its scale and orientation/exposure mean that a connection with the wider countryside and contribution to openness is maintained.	C	LC	LC	LC	C	The parcel plays a local role in respect of maintaining openness within Sanderstead.
S5	Sanderstead Plantation,	MOL	C	LC	LC	LC	LC	C	Whilst the parcel is bounded on all sides and of modest size, it nevertheless prevents, at a very local scale, the continuation of sprawl along the Addington Road.	C	LC	SC	LC	SC	The parcel is of local importance in respect of providing character and openness within Sanderstead as well as being of strategic importance in respect of nature conservation.
S6	Land at Selsdon Hill and Kings Wood, south of Addington Road, Sanderstead	Green Belt	SC	C	SC	LC	LC	SC	The size of the parcel, its location to the south of Sanderstead and Selsdon and its unbounded internal character means that it makes a Significant Contribution to both preventing the further sprawl of development and maintaining the openness of the land which retains a semi-rural character.	SC	C	SC	SC	SC	The parcel is of strategic importance in respect of its structural role, nature conservation and recreational significance, as well of local importance in respect of providing character and openness within Sanderstead.

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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
S7	Selsdon Woods	Green Belt	SC	C	SC	LC	LC	SC	The parcel makes a Significant Contribution to preventing the sprawl of the large built-up area of Selsdon into open countryside, as well as preventing incremental encroachment. The parcel works in combination with the wider Green Belt within Tandridge District.	SC	C	SC	SC	SC	The parcel is of strategic importance in respect of its structural, recreation and nature conservation roles.
SW1	Land southeast of Meadow Hill, Woodcote	Green Belt	SC	C	SC	LC	LC	SC	The parcel is part of wider Green Belt land within Sutton Borough which together act to prevent the westward sprawl of Purley into open countryside, as well as preventing incremental change in an area with no substantive boundaries to contain development.	C	LC	C	C	C	Whilst of modest scale, in combination with land makes a Contribution to MOL purposes as part of its current and GI function.
SW2	Rickman Hill recreation ground, Coulsdon	Green Belt	C	C	C	LC	LC	C	Whilst the immediate parcel is of relatively small scale and clearly laid out as public open space, it nevertheless makes a Contribution to Green Belt purposes in combination with wider open land to the west.	LC	LC	LC	C	C	Whilst a local facility, the land on balance makes a Contribution to MOL purposes as part of its current and potential GI function.
SW3	Land southeast of	Green Belt/MOL	LC	LC	LC	LC	LC	LC	The land is of a size and location which limits its Green Belt role,	C	LC	LC	C	C	The parcel's size, location and aspect mean that on balance it makes a



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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
	Portnalls Road, Coulsdon								emphasised by the redevelopment of land at Cane Hill which encloses the parcel. Nevertheless, there remains a quality of visual and physical openness which means the land retains a limited Green Belt role.						Contribution to MOL purposes, including a very small sub-parcel to the north, with potential for replacing Green Belt designation with MOL designation across the parcel as a whole.
SW4	Land at Canes Hill, Coulsdon	Green Belt	LC	LC	LC	LC	LC	LC	The parcel has been redeveloped for medium-density housing, with some associated amenity grassland and woodland areas. As such the parcel makes no contribution to the Green Belt.	LC	LC	LC	LC	LC	The parcel has been redeveloped for medium-density housing and as such makes no contribution to MOL.
SW5	Land at Portnalls Road/ Hollymeoak Road	Green Belt	C	C	C	LC	LC	C	The land is of a substantial scale which retains the quality of open countryside despite being isolated by built development. Despite being visually enclosed from surrounding roads, with no public access, there are clear views into the parcel from Farthing Down which confirm its open character. Consequently, the Green Belt serves to prevent localised sprawl and encroachment.	C	LC	SC	C	SC	The parcel's location with the A23 corridor and aspect mean that it makes some contribution to the structure of London by providing context for the southern gateway to Coulsdon and Croydon. The parcel's nature conservation value means that it makes a Significant Contribution to MOL purposes.



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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
SW6	Land to the southwest of Woodfield Hill, Chipstead	Green Belt	SC	LC	SC	LC	LC	SC	The land forms part of the southwestern edge of Coulsdon, preventing sprawl and protecting open countryside from encroachment, in combination with land in Reigate & Banstead Borough.	C	LC	SC	C	SC	The parcel's location with the A23 corridor and aspect mean that it makes some contribution to the structure of London by providing context for the southern gateway to Coulsdon and Croydon. The parcel's nature conservation value means that it makes a Significant Contribution to MOL purposes.
SW7	Land south of Hooley Farm	Green Belt	SC	LC	C	LC	LC	SC	The land forms part of the southwestern edge of Coulsdon, preventing sprawl and protecting open countryside from encroachment.	C	LC	LC	LC	C	The parcel's location with the A23 corridor and aspect mean that it makes some contribution to the structure of London by providing context for the southern gateway to Coulsdon and Croydon.
SW8	Farthing Down	Green Belt	SC	C	SC	LC	LC	SC	The land forms part of the southern edge of Coulsdon, preventing sprawl and protecting open countryside from encroachment.	SC	SC	SC	SC	SC	The parcel's nature conservation value, landscape and recreational role means that it makes a Significant Contribution to MOL purposes.
SW9	Farthing Down/Happy Valley/Coulsdon Common	Green Belt	SC	C	SC	LC	LC	SC	The land forms the southwestern edge of Old Coulsdon/Coulsdon, preventing sprawl and protecting open countryside from encroachment.	SC	SC	SC	SC	SC	The parcel's nature conservation value, landscape and recreational role means that it makes a Significant Contribution to MOL purposes.



Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
SW10	Coulsdon Common	Green Belt	SC	SC	SC	SC	LC	SC	The land forms the bulk of the remaining gap between Old Coulsdon and Caterham, containing these settlements and protecting open countryside from encroachment.	SC	SC	SC	SC	SC	The parcel's nature conservation value, landscape and recreational role means that it makes a Significant Contribution to MOL purposes.
SW11	Land to the north of Stites Hill Road, west of Rydon Lane	Green Belt	C	C	C	LC	LC	C	The land, whilst strongly enclosed on all sides nevertheless exhibits qualities of openness which mean that, along with its role in containing the built edge of Old Coulsdon, the parcel makes a Contribution to Green Belt purposes.	LC	LC	SC	SC	SC	The parcel's nature conservation value and context for the London Loop means that it makes a Significant Contribution to MOL purposes.
SW12	Coulsdon Common	Green Belt	SC	SC	SC	SC	LC	SC	The land forms the bulk of the remaining gap between Coulsdon, Purley, Caterham and Warlingham, containing these settlements and protecting open countryside from encroachment.	SC	SC	SC	SC	SC	The parcel's nature conservation value, landscape and recreational role means that it makes a Significant Contribution to MOL purposes.
SW13	Kenley Common/ Kenley House	Green Belt	SC	SC	SC	SC	LC	SC	The land forms part of the remaining gap between Purley, Caterham and Warlingham, containing these settlements and	SC	SC	SC	SC	SC	The parcel's nature conservation value, landscape and recreational role means that it makes a Significant Contribution to MOL

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Parcel	Location	Designation	Green Belt Contribution							MOL Contribution						
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary	
										protecting open countryside from encroachment.						purposes.
SW14	Land east of Old Lodge Lane, Kenley (Betts Mead)	Green Belt	SC	SC	SC	C	LC	SC		The parcel is an important part of remaining open land in this locality, containing adjacent suburban development and connected to wider open land to the south and west. The land is important wedge between Coulsdon/Old Coulsdon and Kenley.	SC	LC	SC	SC	SC	The parcel's size and character and its strategic recreational. Nature conservation and GI functions means that it makes a Significant Contribution to MOL purposes.
SW15	Land off Whitfield Avenue/Firs Road/Roffey Close, Kenley	Green Belt	LC	LC	LC	LC	LC	LC		The parcel is of a scale, configuration and location which makes its Green Belt contribution limited.	LC	LC	SC	SC	SC	Whilst the parcel is of a small scale, it plays an important role locally as a recreational with various informal rights of way through including the Downs Walk and is of importance for nature conservation.
SW16	Land between Coulsdon Court Road and Old Lodge Lane, Coulsdon	Green Belt	SC	SC	SC	C	LC	SC		The parcel is an important part of remaining open land in this locality, containing adjacent suburban development and connected to wider open land to the south. The land is important wedge between Coulsdon/Old Coulsdon and Kenley.	SC	LC	SC	SC	SC	The parcel's size and character and its strategic recreational, nature conservation and GI functions means that it makes a Significant Contribution to MOL purposes.



Parcel	Location	Designation	Green Belt Contribution							MOL Contribution					
			Sprawl	Merger	Encroachment	Setting	Regeneration	Overall	Commentary	Structure	Facilities	Features	Green Infrastr.	Overall	Commentary
SW17	Recreation Ground, Old Coulsdon	Green Belt	LC	LC	LC	SC	LC	SC	The parcel is part of the urban environment at Old Coulsdon but is entirely covered by the Bradmore Green Conservation Area, therefore making a Significant Contribution to its purposes.	LC	LC	SC	LC	SC	Whilst the parcel is of a small scale, it plays an important role locally as a recreational and amenity space.



3.3 Analysis

9. The results of the Assessment, mapped in Figures 3.1 and 3.2 and detailed in Table 3.1 and Appendix A, demonstrate the widespread meeting of Green Belt purposes and MOL criteria. The great majority of parcels make at least an overall Contribution to Green Belt and MOL criteria, reflecting the role of the Green Belt as the inner edge of the Metropolitan Green Belt and a combination of strategic and localised roles for MOL parcels. Together, Green Belt and MOL help to maintain a clear distinction between town and country, and to a lesser degree between some of the suburbs within the Borough.
10. The Green Belt within Croydon principally acts to prevent the further sprawl of the outer London suburbs (Coulsdon/Old Coulsdon, Purley/Kenley, Sanderstead, Selsdon and New Addington) into open countryside to the south of the Borough, in so doing maintaining a reasonably clear distinction between town and country.
11. The role of preventing further sprawl is complemented by a separation function, maintaining a degree of spatial identity between the suburbs, but more particularly between these suburbs and towns to the south such as Caterham, Warlingham and Biggin Hill. The prevention of the encroachment of development into open countryside through incremental change is also a generally significant role. This transition zone between town and country is inherently fragile, starting with land use change, but accelerated by development pressures. Whilst the presence of a significant array of biodiversity designations across this southern arc acts as a strong development constraint in its own right, the co-ordination of Green Belt policy between neighbouring authorities is important to its effective functioning.
12. The following paragraphs summarise the broad form and function of the Green Belt across the study area.

Land Making an Overall Significant Contribution to Green Belt Purposes

13. The bulk of Green Belt land which is judged to make a Significant Contribution acts to contain the built edge of Croydon and its suburbs – Coulsdon/Old Coulsdon, Purley/Kenley, Sanderstead, Selsdon, Shirley and New Addington – where prior to Green Belt designation development occurred largely unchecked by clear boundaries. This has resulted in numerous instances of the Green Belt directly abutting the back gardens of houses which are part of much larger suburbs, thereby containing their potential for unrestricted expansion. The Significant Contribution of much of this land to the Green Belt complements that within the adjoining local authorities of Reigate & Banstead and Tandridge, where the wider Green Belt contains pressures for development within this highly accessible area, preventing incremental encroachment through ad hoc development as well as maintaining separation between towns, in this case between the suburbs of Croydon and Caterham, Warlingham and Biggin Hill.
14. Locally, various MOL parcels make a Significant Contribution to Green Belt purposes. Typically, they have an enclosed character, but help to prevent the merger of specific areas (albeit often far from being clearly differentiated given the character of suburban areas).

Land Making an Overall Contribution to Green Belt Purposes

15. Land making a Contribution to Green Belt purposes overall accounts for a relatively small proportion of the Green Belt, reflecting the predominance of land making a Significant Contribution. Largely reflecting their scale, a number of MOL parcels make a Contribution to Green Belt purposes.

Land Making an Overall Limited Contribution to Green Belt Purposes

16. A number of MOL parcels have been identified as making an overall Limited Contribution to Green Belt purposes, reflecting the absence of a clear strategic or local role. However, for Green Belt parcels, only three have been identified as making a Limited Contribution overall, reflecting the presence of built development (in the case of Cane Hill), or being of a limited scale. By contrast, these latter examples could hold potential as MOL should Green Belt designation be removed.

Land Making an Overall Significant Contribution to Metropolitan Open Land Criteria

17. The majority of parcels are judged to make an overall Significant Contribution to MOL criteria, reflecting their fulfilment of multiple purposes set by the London Plan and critical role as part of the character of specific localities. Strategically, many of the MOL parcels are of significance to London as a whole, being part of networks of greenspace which have been identified as part of the All London Green Grid. Many Green Belt parcels are judged to make a Significant Contribution to MOL criteria largely based on the presence of biodiversity, archaeological and recreational resources.

Land Making an Overall Contribution to Metropolitan Open Land Criteria

18. Parcels identified as making an overall Contribution to MOL criteria reflects their typically more localised role (in terms of the London Plan), but which can be significant to the character of a local area.

Land Making an Overall Limited Contribution to Metropolitan Open Land Criteria

19. Only two parcels (land at Canes Hill and land at Overstone Gardens, Monks Orchard) were found to make a Limited Contribution to MOL criteria, with other parcels making a Contribution or Significant Contribution to at least one criterion.

3.4 Analysis by Green Belt Purposes

Checking the sprawl of large built-up areas

20. The location of the parcels which make a significant contribution to this purpose are unsurprisingly related to the immediate urban edge, where the Green Belt checks the spread of the contiguous built area, but also to transport corridors where there are pressures for (and evidence of) change. The inner edge of the Metropolitan Green Belt plays a significant role (supported by the wider Green Belt) in containing the tendency associated with large urban areas for unconstrained sprawl particularly along transport corridors. This role is clearly of particular significance, in relation to the suburbs of Croydon at Coulsdon/Old Coulsdon, Purley/Kenley, Sanderstead, Selsdon, Shirley and New Addington which abut the inner edge of the Metropolitan Green Belt.

Preventing neighbouring towns from merging

21. Maintenance of the separation of Croydon and its suburbs from settlements to the south within Tandridge District (Caterham, Warlingham and Biggin Hill), but also to a lesser degree between the suburbs of Croydon. The extent of separation can be difficult to discern (notably between Coulsdon/Old Coulsdon and Caterham and between Purley/Kenley and Warlingham) where physical merger is virtually complete, but nevertheless important for local identity. Separation between suburbs can be far more difficult to discern, but the fingers of Green Belt reaching into the suburbs from the south act to maintain a degree of separate identity within a wider expanse of suburbia.

Safeguarding the countryside from encroachment

22. This is a typically more generalised purpose, related to incremental change (either actual or potential) whereby land becomes progressively urbanised and loses its quality of physical openness. Figure 3.5 illustrates the pattern of contribution in this respect, reflecting the broad containment of development which results in a clear distinction between town and country and the wider regulation of incremental change within open land which, over time, can result in an urbanised appearance and function.

Preserving the setting and character of historic towns

23. As noted in the methodology, there is consideration of both strategic and local matters in respect of contribution to Green Belt purposes, notably in respect of historic towns. Conservation Areas are used as a proxy for areas of historic interest to which Green Belt and MOL can contribute by way of providing part of their context.
24. Whilst there are no historic towns associated with the Green Belt in this locality, there is nevertheless a locally significant role in maintaining the setting for various Conservation Areas, notably in respect of Kenley Aerodrome and Addington village, but also in relation to MOL at Norwood Grove where the protection of assets of Metropolitan importance in relation to a Registered Park & Garden is of significance.

Assisting in urban regeneration

25. Given the scale of the parcels and general absence of derelict or under-utilised land, the connection between Green Belt policy and regeneration is only discernable at the sub-regional scale. In the case of Croydon, where a connection does exist, this is likely to be in relation to the focusing of development on central Croydon and immediate area.

Figure 3.3 Contribution to Checking the Sprawl of Large Built-up Areas



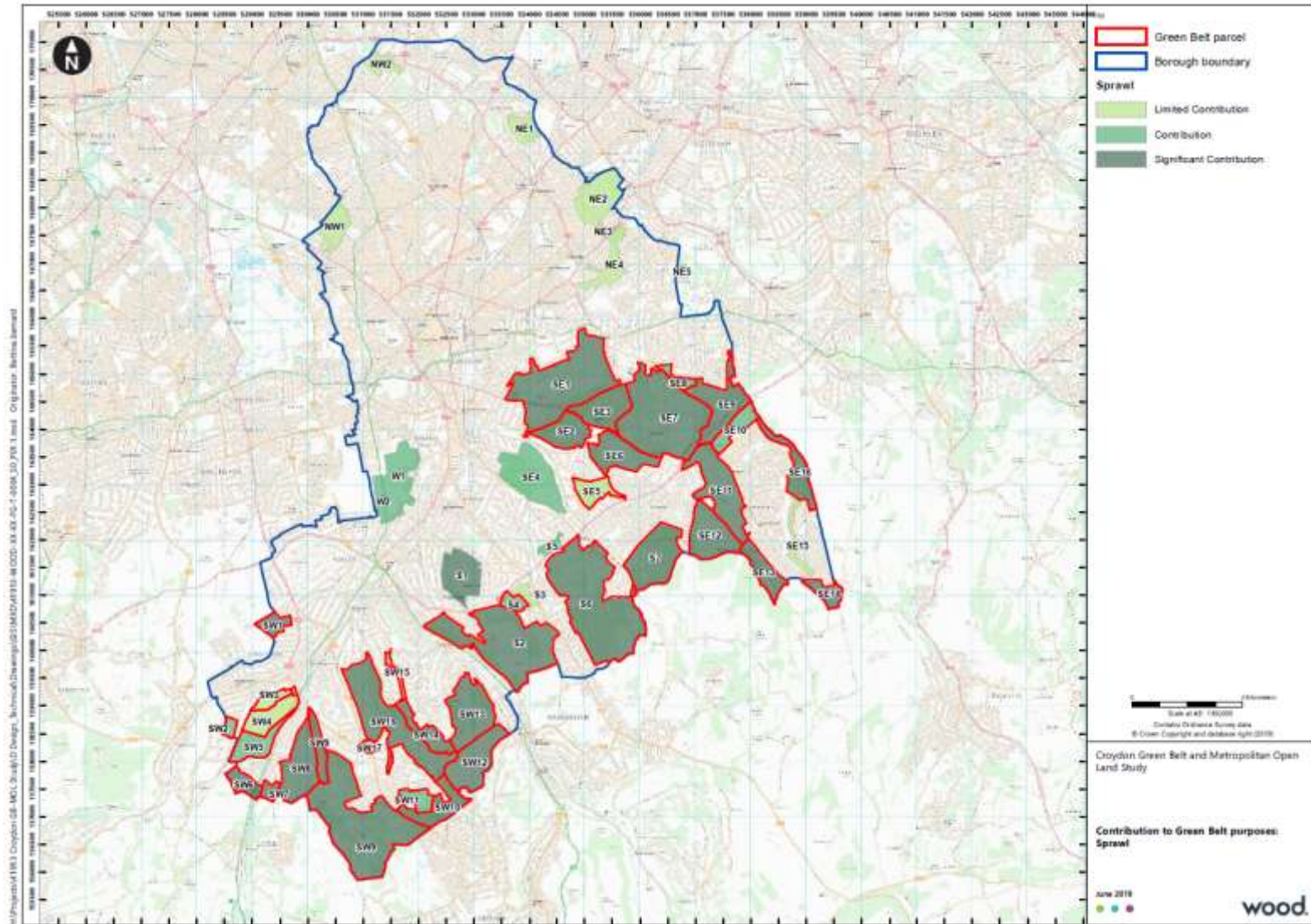


Figure 3.4 Contribution to Preventing Towns from Merging



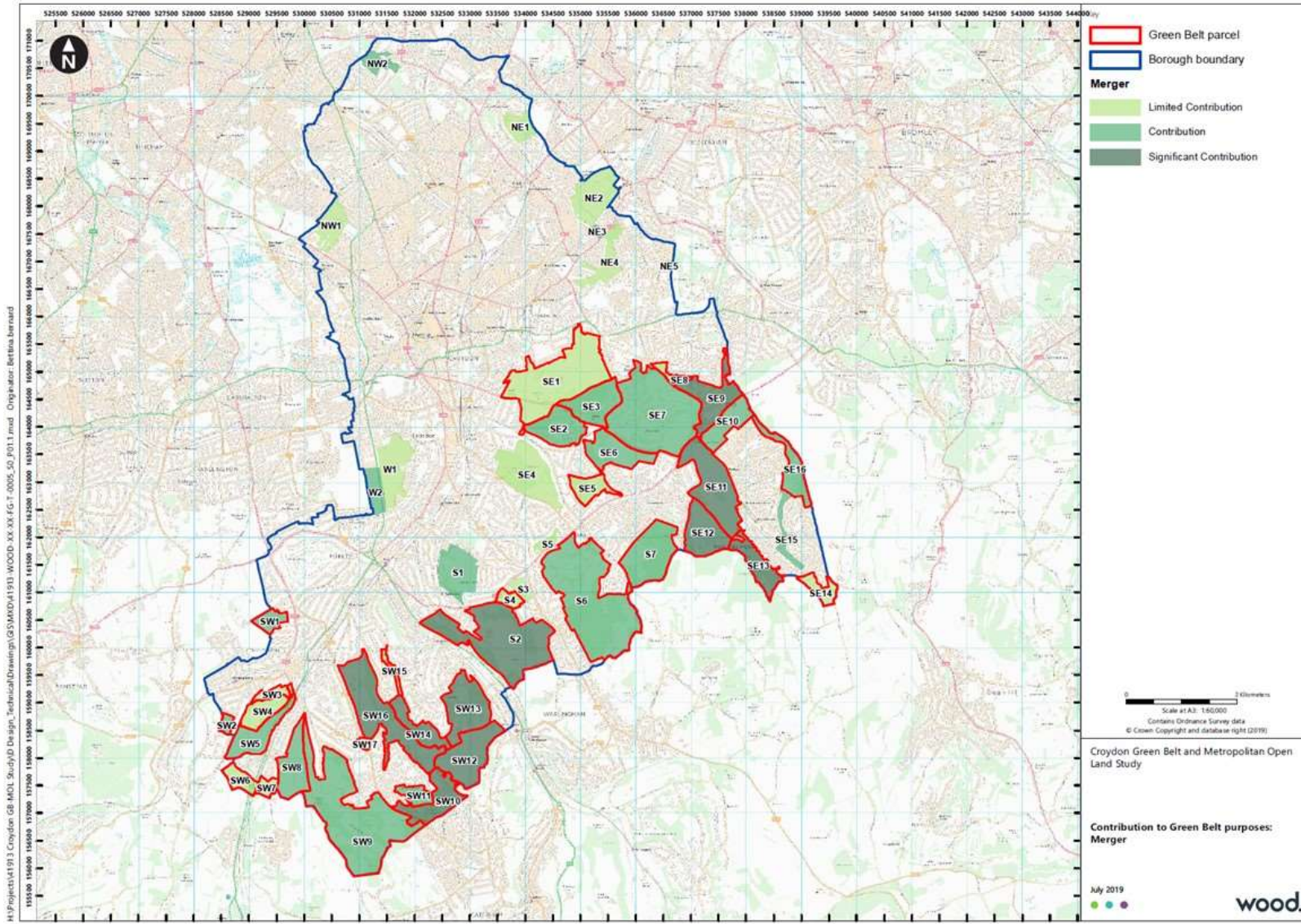


Figure 3.5 Contribution to Safeguarding the Countryside from Encroachment



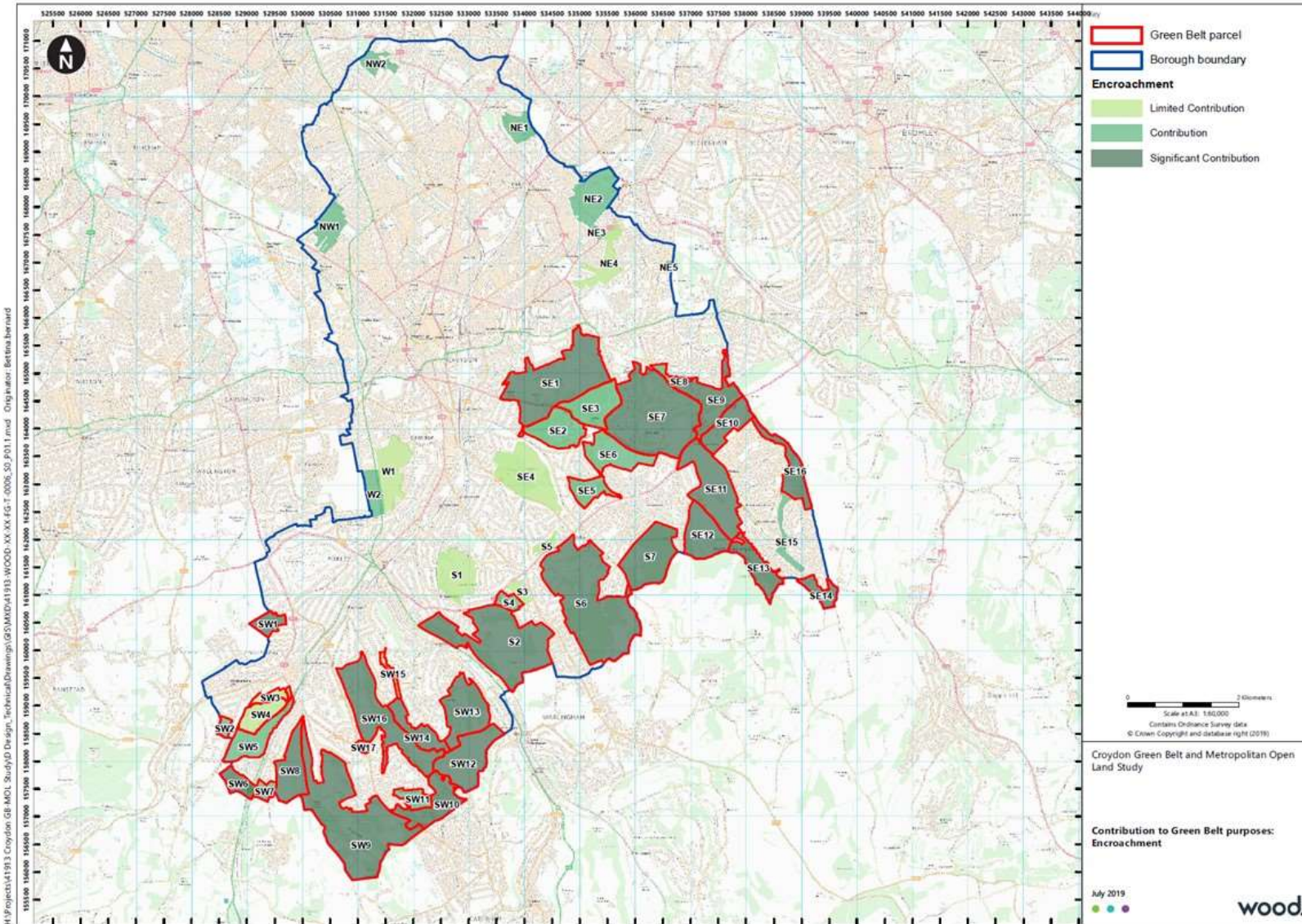
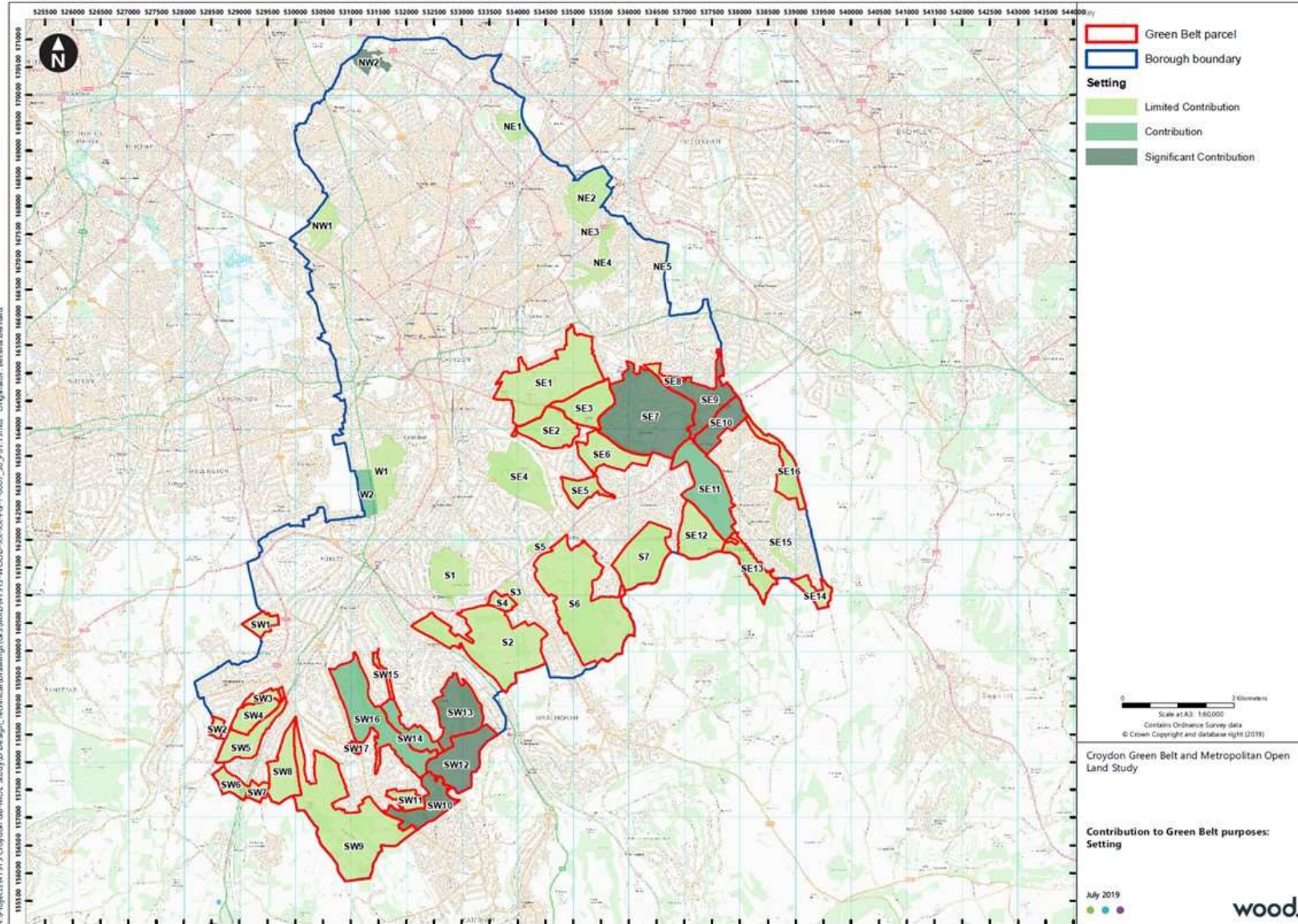


Figure 3.6 Contribution to Setting





3.5 Analysis by Metropolitan Open Land Criteria

Overview

26. Assessment of MOL against the criteria set by the London Plan (Policy 7.17) reveals that all MOL parcels fulfill at least one of the criteria, with the majority fulfilling three or four. As with Green Belt, some parcels have complex internal divisions and land uses, and it follows that not all parts of the parcels will necessarily make a similar contribution. Overall, many parcels are assessed as performing multiple roles which together enhances their overall contribution to MOL criteria. The assessment of Green Belt parcels against MOL criteria reveals that more significant contributions are typically related to the presence of biodiversity and/or recreational resources which are considered to be of Metropolitan significance.

Contributes to the physical structure of London by being clearly distinguishable from the built-up area

27. The majority of parcels (Figure 3.7) make at least a contribution to this purpose, reflecting their scale and consequently a role beyond local amenity. Whilst most areas of MOL are self-contained such as South Norwood Country Park, others (notably Norwood Grove and land off Purley Way) are part of a wider expanse of open land which in turn is significant structurally. The geography and evolution of built development in the Borough means that there are limited examples of contiguous areas of open land, such as river valleys, with resultant pockets of open land which, in combination with locally important open space, act to break up the contiguous built environment.

Includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London

28. This is perhaps the most exacting criterion, and one which many MOL parcels do not meet (Figure 3.8). Equally, the presence of strategic footpaths such as the London Loop and other long-distance footpaths for example, means that many parcels make at least a Contribution in this respect.

Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value

29. Significant numbers, and parts, of many MOL parcels have designated Sites of Nature Conservation Importance (SNCIs) and as noted above are part of Strategic Corridors identified within the All London Green Grid. Together, these constitute a significant biodiversity and recreational resource, both as part of open space within London and its connectivity to land beyond the urban area (Figure 3.9). Many Green Belt parcels make a Significant Contribution in this respect, reflecting the presence of biodiversity resources which are considered to be of Metropolitan-wide significance.

Forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

30. The great majority of MOL parcels are assessed as making at least a Contribution to the network of Green Infrastructure (Figure 3.10), being part of a Green Chain and/or identified as part of the All London Green Grid. This function is typically complemented by fulfilment of other MOL criteria such as the provision of features of metropolitan value. The connections between MOL and Green Belt are important in fulfilling the aspirations of the ALGG in providing a connected GI network across London. Any further erosion resulting in the fragmentation of connectivity challenges this aspiration.

Figure 3.7 Contributes to the Physical Structure of London, distinguishable from the built-up area

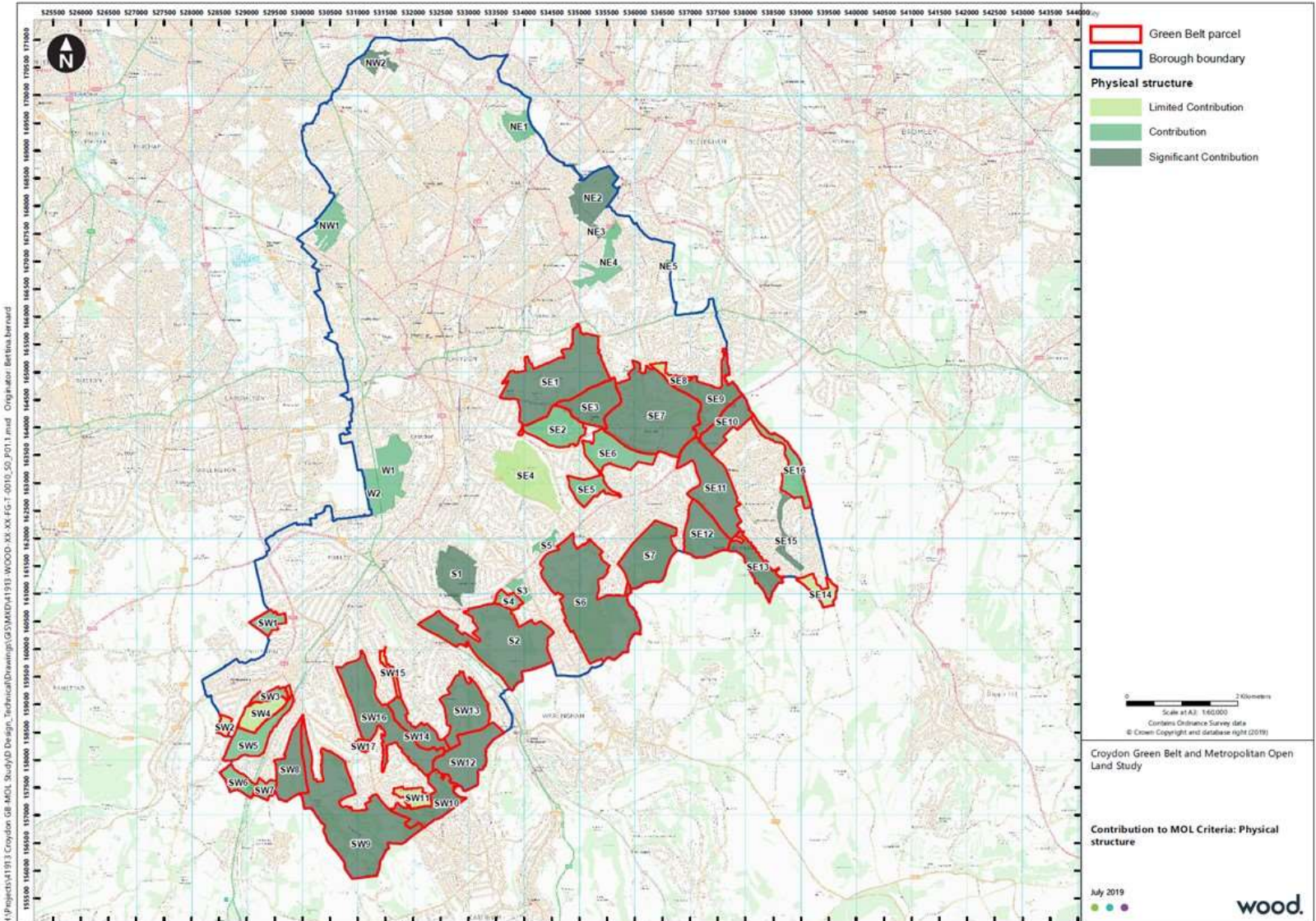


Figure 3.8 Includes open air facilities which serve either the whole or significant parts of London

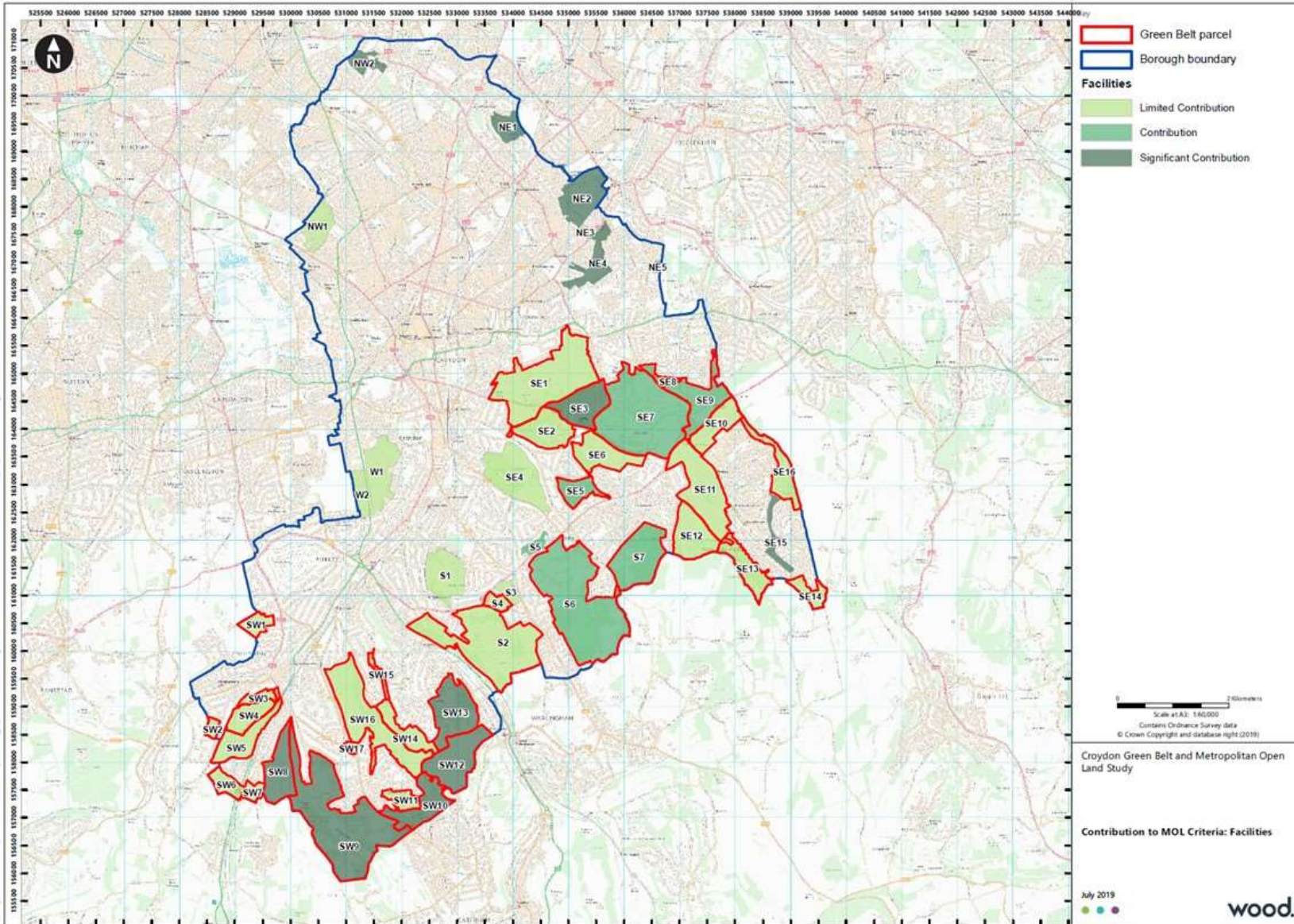


Figure 3.9 Contains features or landscapes of national or metropolitan value



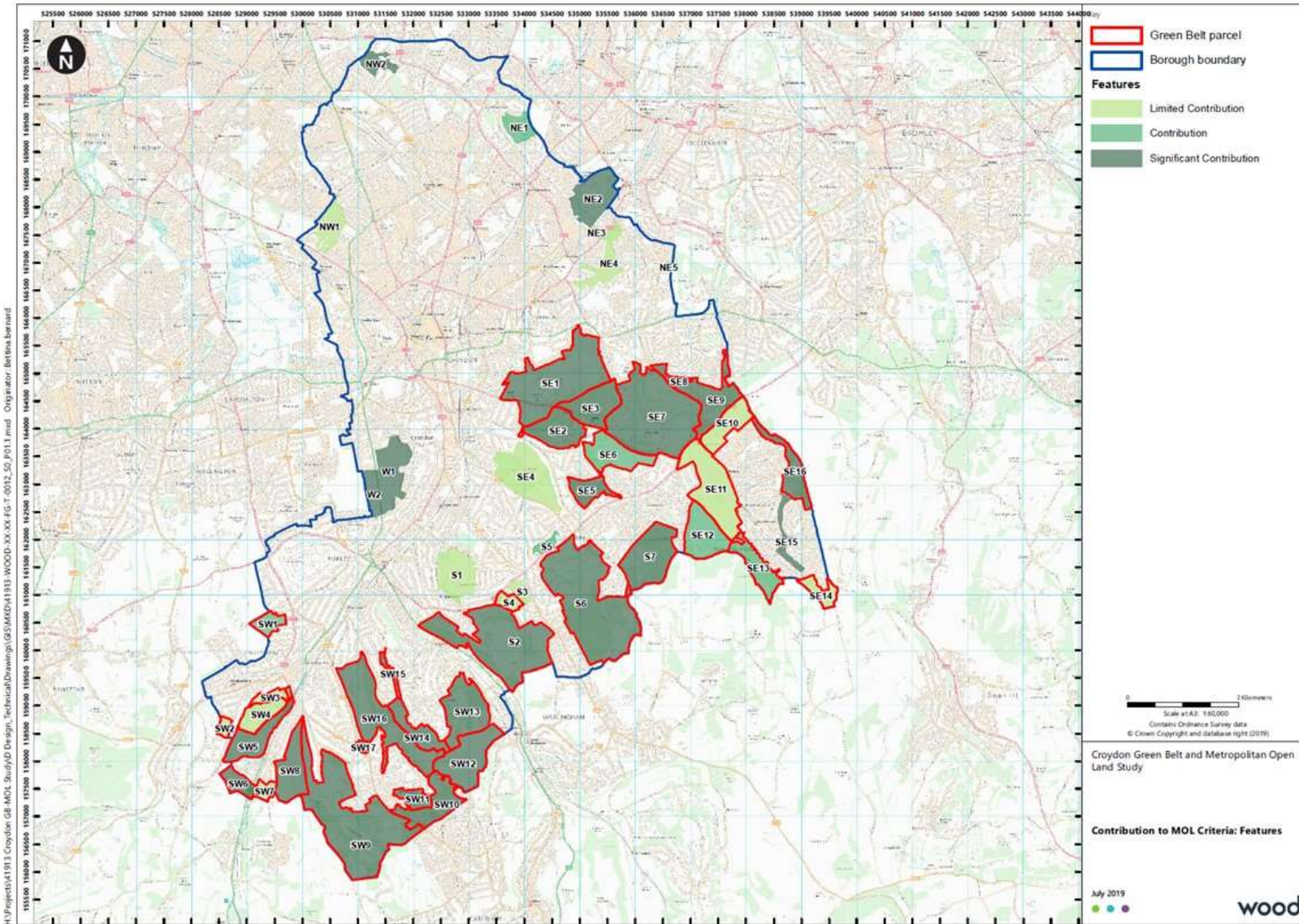
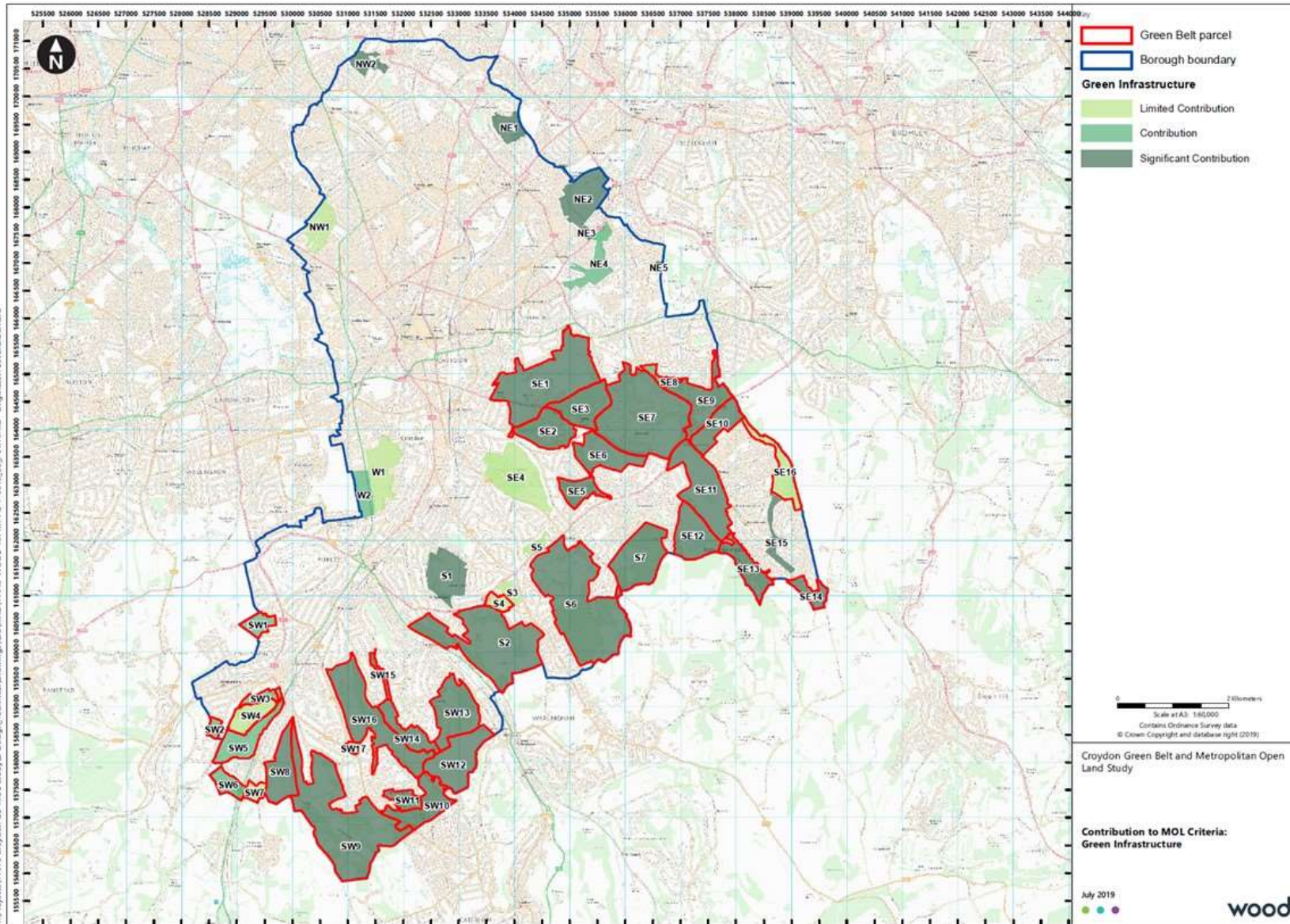


Figure 3.10 Forms part of a Green Chain or a link in the network of green infrastructure



3.6 Matters of note from Adjoining Green Belt Studies

31. The outputs from Green Belt Reviews in three adjacent authorities – Sutton, Reigate & Banstead and Tandridge are set out in **Appendix B** and have been taken into account in the analysis.

The area of common interest for land within Sutton relates to:

- ▶ Land at Woodcote meeting Green Belt purposes, reviewed in 2003 and supported at Inquiry, which has implications for land within Croydon Borough which is part of this wider context.

The areas of common interest within Tandridge District relate to:

- ▶ The importance of land separating the London fringe settlements (Old Coulsdon, Purley, Kenley, Selsdon, New Addington, Sanderstead and Biggin Hill) from settlements within Tandridge District (Tatsfield, Caterham, Warlingham and Whyteleafe); also the role of land separating Caterham and Whyteleafe (immediately south of Kenley aerodrome), confirmed as in 2016 as performing a clear Green Belt function following a detailed assessment. This analysis has important strategic implications for the role of the Green Belt in Croydon and how it functions in combination with the Green Belt in Tandridge.

The area of common interest within Reigate & Banstead Borough relates to:

- ▶ The inseting within the Green Belt of the village Netherne-on-the-Hill, which has local implications for the gap between the settlement and the southern edge of Coulsdon.



4. Study Conclusions

1. This study has assessed the fulfilment of Green Belt purposes and MOL criteria by land within Croydon Borough. Professional judgement of the study team is used to determine the degree to which Green Belt and MOL is fulfilling the roles set for it within national policy and through the London Plan.
2. The Green Belt and MOL perform their function with only one instance of the function either designation not being fulfilled (this reflecting the parcel being fully developed) to some degree. The key principle of the Green Belt, which is the maintenance of openness, has largely been fulfilled, with the maintenance of a clear distinction between town and country, albeit within the context of a pre-Green Belt pattern of suburban development which has resulted in an often complex configuration of built form on the outer edge of Greater London.
3. Reflecting its role as the inner edge of the Metropolitan Green Belt, the strategic function of the containment of sprawl is a particularly significant one, containing the built edges of suburbs within the Borough, notably at Coulsdon (Old Coulsdon), Purley (Kenley), Sanderstead, Selsdon and New Addington. The role of the Green Belt therefore needs to be considered in the context of the wider Green Belt within Reigate & Banstead, Tandridge and Bromley in particular. Whereas much of this Green Belt serves to prevent encroachment (i.e. erosion of openness through incremental change) of the wider countryside, the principal role of the Green Belt within Croydon is preventing sprawl from often unbounded suburban built edges, a characteristic which makes them potential vulnerable to incremental extension.
4. As a result of the evolution of the pattern of suburban growth, the role of the Green Belt in performing a separation function is often less clear, with linear extensions of the suburbs typically following lower ground, leaving higher ground as dense woodland and/or open grassland. The results present an often-complex interweaving of suburbs with typically little indication of separate identity or where one community starts and another finishes. Green Belt within the southern extent of the Borough plays a continuing role in helping to define the character of these communities, providing part of their context. These separating areas can often be vulnerable to erosion as a result of their size and configuration.
5. Assessment of the role of the Green Belt against MOL criteria reveals a significant role in the provision of assets which are of Metropolitan importance. This includes recreational routes and land which is part of the All London Green Grid green infrastructure network and also considerable areas which are designated as Sites of Nature Conservation Importance (of Metropolitan Importance or Borough Grade I or II). Whilst this is not a Green Belt consideration *per se*, development is typically precluded.
6. Reflecting the often spatially fragmented character of the Green Belt, there are instances of the MOL function being dominant within Green Belt parcels and therefore this potentially being a more appropriate designation than Green Belt.
7. The role of the Green Belt in respect of its purposes varies considerably by area, reflecting the geography of the settlement pattern and how this historic growth has, for example, created various enclosed areas of Green Belt which perform sometimes locally-specific roles which are no less important in respect of place-shaping than the clearer edge of town containment function. Thus, to the south and southeast of the Borough along its border with Tandridge District, the containment of the suburbs of Coulsdon, Sanderstead, Selsdon and New Addington is clear, preventing their potential sprawl into open countryside. In addition, the separation of some of these areas is aided, as well as the prevention of the incremental encroachment of development within open land which can rapidly erode its physical and visual continuity.

8. The relationship between the Green Belt and MOL and Conservation areas can be complex, forming both the context for, and in some cases, the extent of the Conservation Area. Whilst not a strategic Green Belt purpose *per se*, the role of open land for sensitive built environments can be critical and locally highly significant. The clearest expression of the relationship is the setting of the Addington Conservation Area within the Green Belt.
9. Equally, again in a locally significant context, is the relationship between Green Belt and MOL and Registered Parks and Gardens, delivering complementary roles. The Borough has several examples, including at Norwood Grove, Croham Hurst and Coulsdon Manor (the latter two being golf courses).
10. The form and function of MOL often differs from the Green Belt because of its different geography and rationale. In such a densely urbanised areas as Croydon (to the north of its southern fringes) open land can be a rare and hence highly valued asset as a relief from the monotony of built form, a focus for recreation and, in some instances, an important biodiversity asset. The MOL within Croydon very largely fulfils its functions to a significant degree, often contributing to London's GI network as parts of strategic recreational and wildlife corridors. The important interrelationship between Green Belt and MOL within Croydon is expressed through the analysis of Green Belt against MOL purposes which reveals an often Significant Contribution to their recreational and GI-focus, complementing the place-shaping role of Green Belt. This is particularly important when considering the inner edge of the Metropolitan Green Belt where the Green Belt can be fragmented and locally specific in its role.

Use of this report

11. This report is part of the wider evidence base being assembled by Croydon as part of the preparation of the Local Plan. As such, the findings and conclusions will be used in conjunction with other evidence studies which together inform decision making. No recommendations are made in the report regarding areas which may or may not hold potential for their status as either Green Belt or MOL to be changed in light of what is termed 'Exceptional Circumstances'. Further detailed work would be required to determine the effects (strategically and locally) of any such proposals.



Appendix A

Parcel Assessments

See separate document





Appendix B

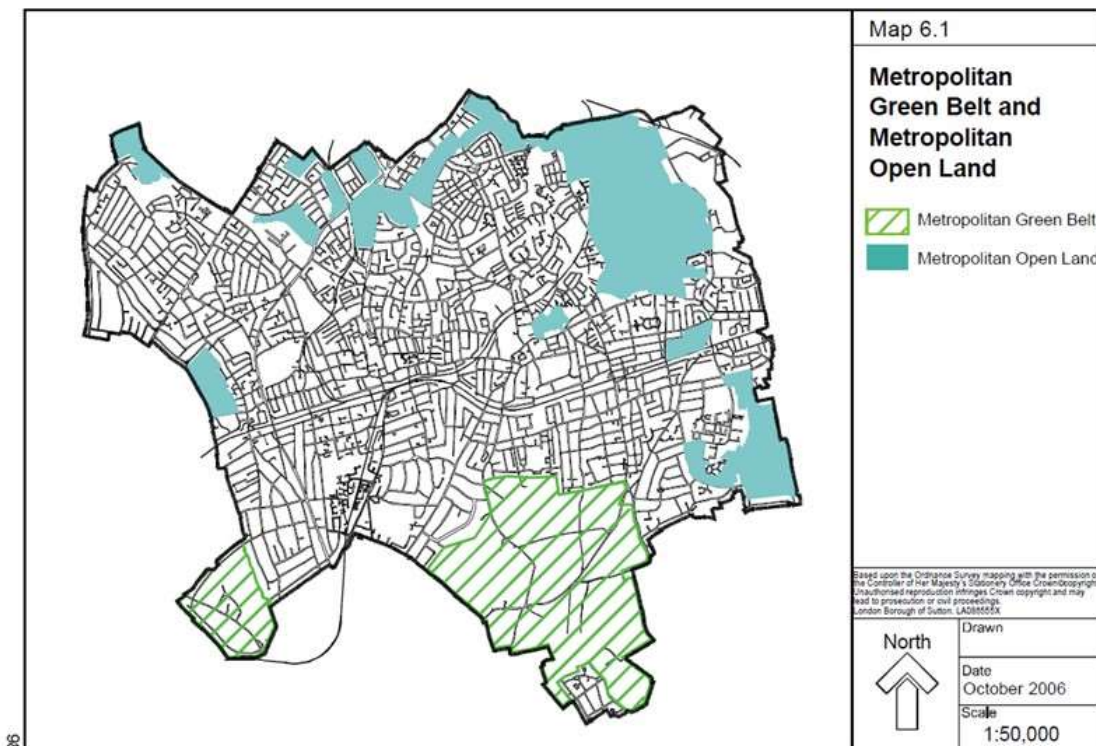
Adjoining Local Authority Green Belt Reviews

Green Belt Reviews have been undertaken in the following adjacent authorities:

- ▶ London Borough of Sutton (2006)
- ▶ Reigate & Banstead Borough Council (2016)
- ▶ Tandridge District Council (2015 – 2018)
- ▶ London Borough of Bromley (2012)

Relevant extracts from Sutton, Reigate & Banstead and Tandridge are reproduced below.

London Borough of Sutton



Revised Sutton UDP (2003)

6.14 The proposals from the Green Belt Supplementary Planning Guidance were incorporated into the draft Revised Sutton UDP. In response to representations to the draft Revised Sutton UDP, the Council undertook a further review of the boundaries of the Metropolitan Green Belt for purpose of the Public Local Inquiry.

6.15 Following this review the Council concluded (as set out in the Proof of Evidence on the Green Belt) that the two parcels of land proposed for continued designation as Green Belt in Sutton (the Little Woodcote Estate and land at Cuddington) met four of the five purposes of including land in the Green Belt as set out in PPG2 and that the inner boundary of the Green Belt

(following the rear of properties or roads) was clear and defensible. As this accords with Government guidance in PPG2 the Council concluded that boundaries should not be altered.

6.16 The Inspector in his report to the Public Inquiry into objections to Green Belt felt the identification of the Little Woodcote Area was logical, and Cuddington should remain designated as Green Belt and should not be identified for development over and above the acceptable uses in the Green Belt as set out in PPG2. It was also considered that there was neither a regional nor local requirement for housing provision that would lead to the need to reappraise the Green Belt boundary.

Reigate & Banstead Borough Council

Green Belt Review, 2017

3. Part 1: Review of land within the broad areas of search for sustainable urban extensions and land currently beyond the Green Belt

Overview

3.1 The primary purpose of Part 1 of this study is to provide evidence to support the identification of sites for urban extensions in the Development Management Plan (in line with Core Strategy Policy CS3 4a) and to assess those areas currently beyond the Green Belt to inform whether the land should be included, or remain excluded, from the Green Belt (reflecting Policy CS3 4c of the Core Strategy).

4. Part 2: Review of minor boundary anomalies

Overview

4.1 The primary purpose of Part 2 of the study is to identify where minor anomalies exist in the borough’s Green Belt boundaries and recommend amendments which would address these anomalies. This is to ensure that, at the localised level, the Green Belt boundary is as far as possible aligned with strong features and therefore likely to be more robust in the long-term.

4.2 It is not the purpose of this part of the study to identify opportunities – however small – for development on the edge of the urban area.

5. Part 3: Review of washed over villages and other land inset within the Green Belt

Table 9: Assessment of physical and functional characteristics

Area	Characteristics	Comments	Overall conclusion
Netherne-on-the-Hill	<i>Critical mass</i>	Approximately 580 dwellings over an area of 26 hectares.	Area is of sufficient scale, distinct identity and has a reasonable degree of physical/functional independence. It is therefore considered to be a village in its own right
	<i>Identity</i>	Physically separated from Coulsdon/Hooley; distinct character in terms of dwelling mix, style, village green. Active independent residents association with "village plan".	
	<i>Independence</i>	Own village shop, recreational and leisure facilities.	



Tandridge District Council

Green Belt Review, 2015

5.5. The Strategic Green Belt Areas and their character are set out below:

Strategic Area A – A swathe of Green Belt that separates London fringe settlements (Old Coulsdon, Purley, Kenley, Selsdon, New Addington, Sanderstead and Biggin Hill) from settlements within Tandridge district (Tatsfield, Caterham, Warlingham and Whyteleafe). The Strategic Area of Green Belt is fragmented and dominated by infrastructure features; railways and roads that lead towards the conurbation of London. The area consists of

very steep topography and contains some industrial estates. Some of the area is slightly depleted and tranquillity is slightly less than in other Strategic Green Belt areas. There are some large open spaces in this area, some of which are currently tired and overgrown.

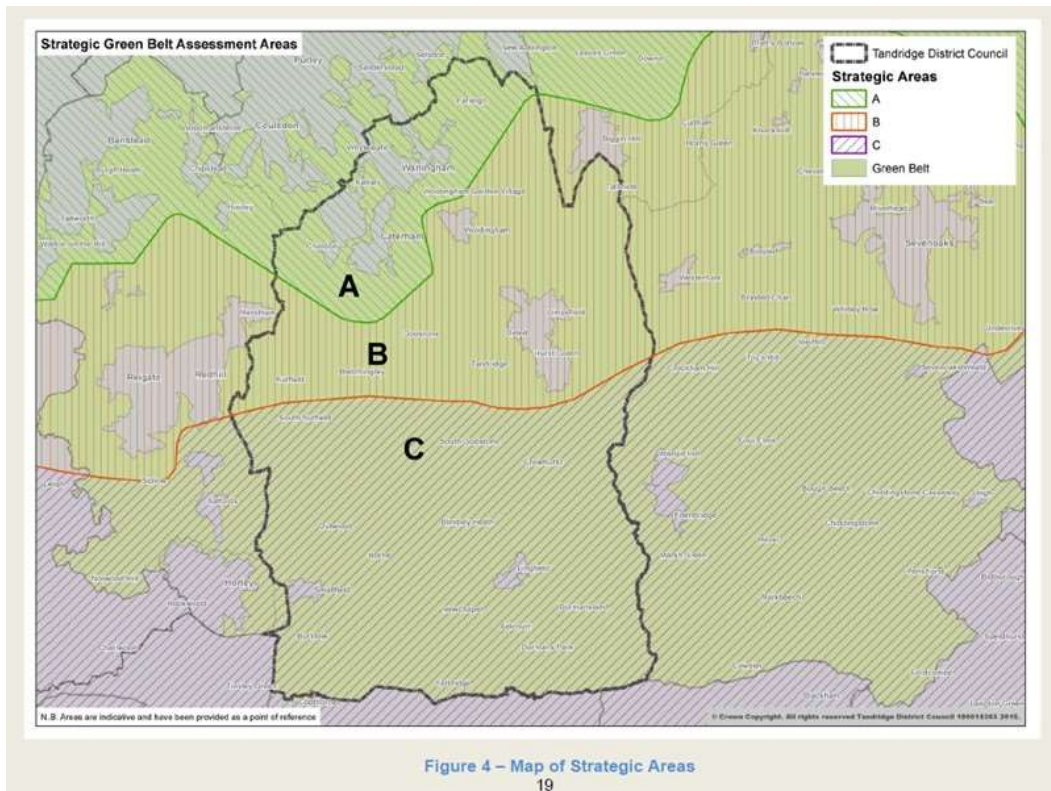


Figure 4 – Map of Strategic Areas
19

5.10. **Strategic Area A:**

- Strong role in containing the urban conurbation of London and the large built up areas in the District and outside;
- Prevents the coalescence of a number of the towns within the strategic area;
- Contributes less effectively towards safeguarding the countryside as large areas in this strategic area contain development and infrastructure; and
- Varies in how it preserves the setting of Conservation Areas; those in the outlying countryside are preserved by this strategic area of Green Belt; Conservation Areas within the urban settlements are not.



6.4. The vast majority of the parcels perform well against the purposes of the Green Belt. The measure of how successful an area of Green Belt is at performing against the purposes generally relates to its proximity to development, and so conversely areas of Green Belt that are open countryside far away from the urban areas tend to perform well against only one of the purposes: safeguarding the countryside against encroachment. However, this in no way devalues their contribution: areas that only serve one purpose effectively still contribute to the overall aims of the Green Belt.

6.7. As recognised by the methodology and the strategic assessments, there are a number of large built up areas outside the District, but that are right on the boundary. Under purpose 1, it is clear that the Green Belt in Tandridge plays an effective role in preventing sprawl from places such as Kenley, Selsdon, New Addington, Biggin Hill, South Merstham, Redhill, Cophorne and East Grinstead.

Table 1 – Areas for Further Investigation

Area of Further Investigation Number	Area / Location	Summary of Reasons
001	District Boundary with Croydon (Adjoining Selson and New Addington)	As set out in the assessment on Strategic Area A, parcels to the north of the District within the Green Belt have an effective role in continuing to guard against sprawl from London. The Green Belt between Selsdon / New Addington / Waringham is extremely effective and positively deviant from the purposes of the Green Belt. To identify if this area should be given greater protection or whether it really is fulfilling this purpose strongly, it has been identified as an area for further investigation.

Area of Further Investigation Number	Area / Location	Summary of Reasons
006	District Boundary with Croydon (Adjoining Kenley)	The assessment on Strategic Area A recognises that due to the parcel's proximity to London, the northern areas of the District are considered to check against urban sprawl from the Kenley Aerodrome. As development beyond the District cannot be controlled, it is important to maintain the integrity of the Green Belt in the north of the District to ensure there is a buffer against development from neighbouring London Borough, in this case Croydon. As such, this area has been identified as an area for further investigation.



Area of Further Investigation Number	Area / Location	Summary of Reasons
008	Strip of Green Belt that separates Caterham on the Hill / Caterham Valley and Whyteleafe(GBA 004)	<p>As set out in the assessment on Strategic Area A, the north of the District has a role in preventing the sprawl from Greater London. The development that has occurred in Kenley has created sprawl into Caterham. As this area has changed substantially since Green Belt has been designated, this parcel is at risk of development. This is particularly apparent in that the space between Caterham on the Hill and Caterham Valley as it was designated for residential development in the 1974 Surrey Development Plan. The reason why this area was never built out and put back into the Green Belt is unknown. However, it could be due to the topography of the parcel. For all these reasons, this area has been identified as an area for further investigation.</p> <p>Further, this thin strip of Green Belt separates Caterham Valley, Caterham on the Hill and Whyteleafe, and at some points these settlements are in very close proximity to each other. The redevelopment of Kenley Aerodrome, whilst not physically merging Kenley with Caterham, has created the perception of settlements merging. Further, the area contains a mix of uses, such as schools and sports grounds, which add to the perception that the settlements adjacent are merging. Whilst the topography and woodland between the settlements assist in preventing coalescence, the Green Belt also plays a role and as such this parcel is extremely effective at meeting this purpose. To understand the relevance of this parcel in preventing coalescence, this area has been identified as an area for further investigation.</p>

2016 Part 2 Review

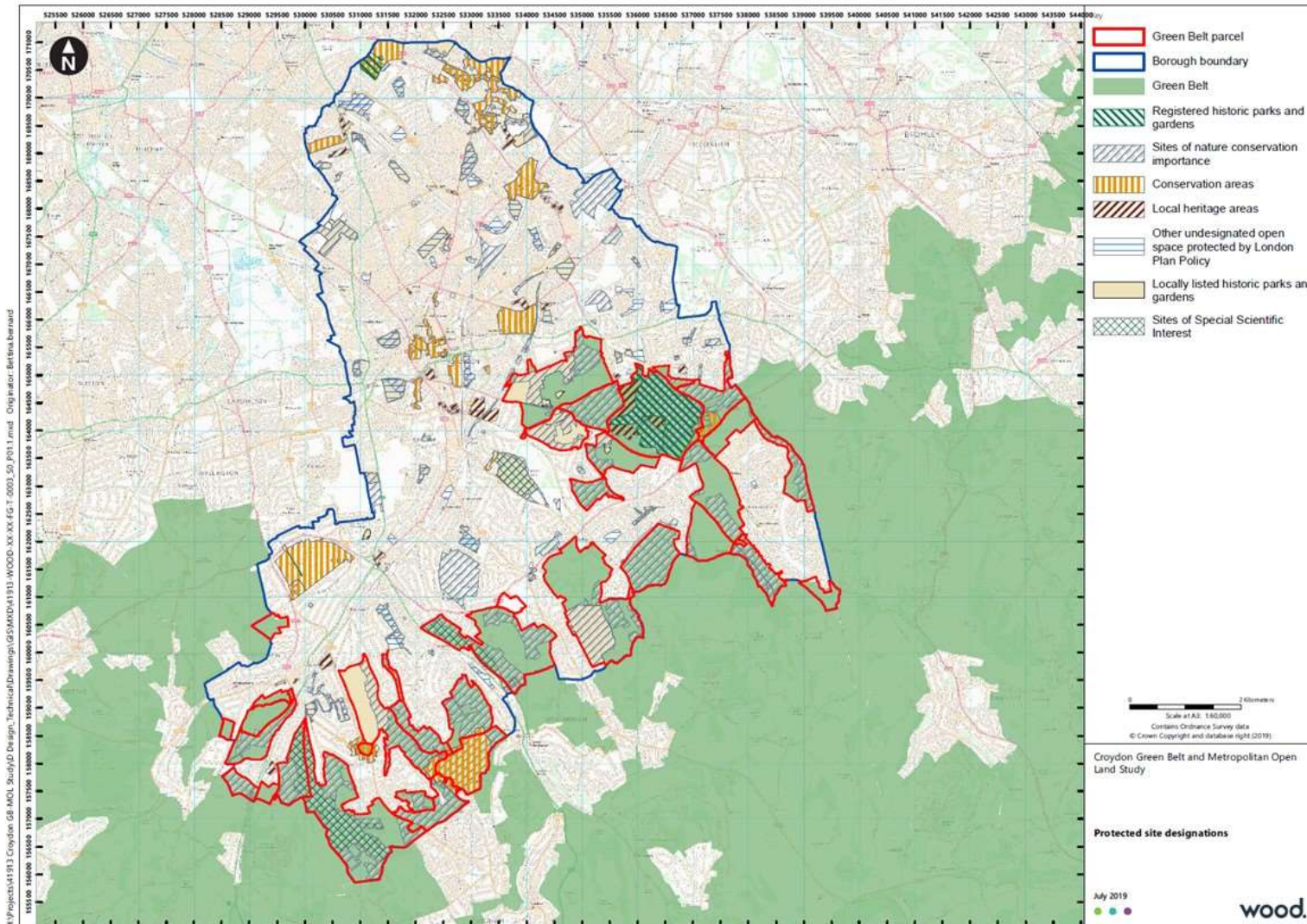
AFI 008	Strip of Green Belt that separates Caterham on the Hill/Caterham Valley and Whyteleafe	<p>This Area for Further Investigation is identified in the parcel assessment of GBA 004 set out in the Green Belt Assessment (Part 1)(December 2015) as a buffer between Caterham Valley, Caterham on the Hill and Whyteleafe, which in part serves to prevent sprawl from the London Boroughs.</p> <p>Except land accommodating Queens Park, which forms part of analysis area 5, the remainder of this Area for Further Investigation serves the Green Belt purposes well and should be ruled out from further consideration as part of the Green Belt Assessment. The Queens Park area however is not considered to serve the purposes of including land within the Green Belt. It is sited between built form that is located in Caterham on the Hill and therefore does not serve to prevent settlements from merging. Being bounded by built-up areas to the north, south and west, it also does not prevent sprawl. Whilst countryside by definition, it has the character and appearance of an urban park, which together with its siting bounded by urban development results in sense of enclosure and containment. It is therefore not considered to serve the purpose of safeguarding from encroachment. As such, the land accommodating Queens Park is recommended to be considered further as part of the Green Belt Assessment, whilst the remainder of the Area for Further Investigation is ruled out from further consideration as part of the Green Belt Assessment.</p>
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Appendix C Protected Site Designations





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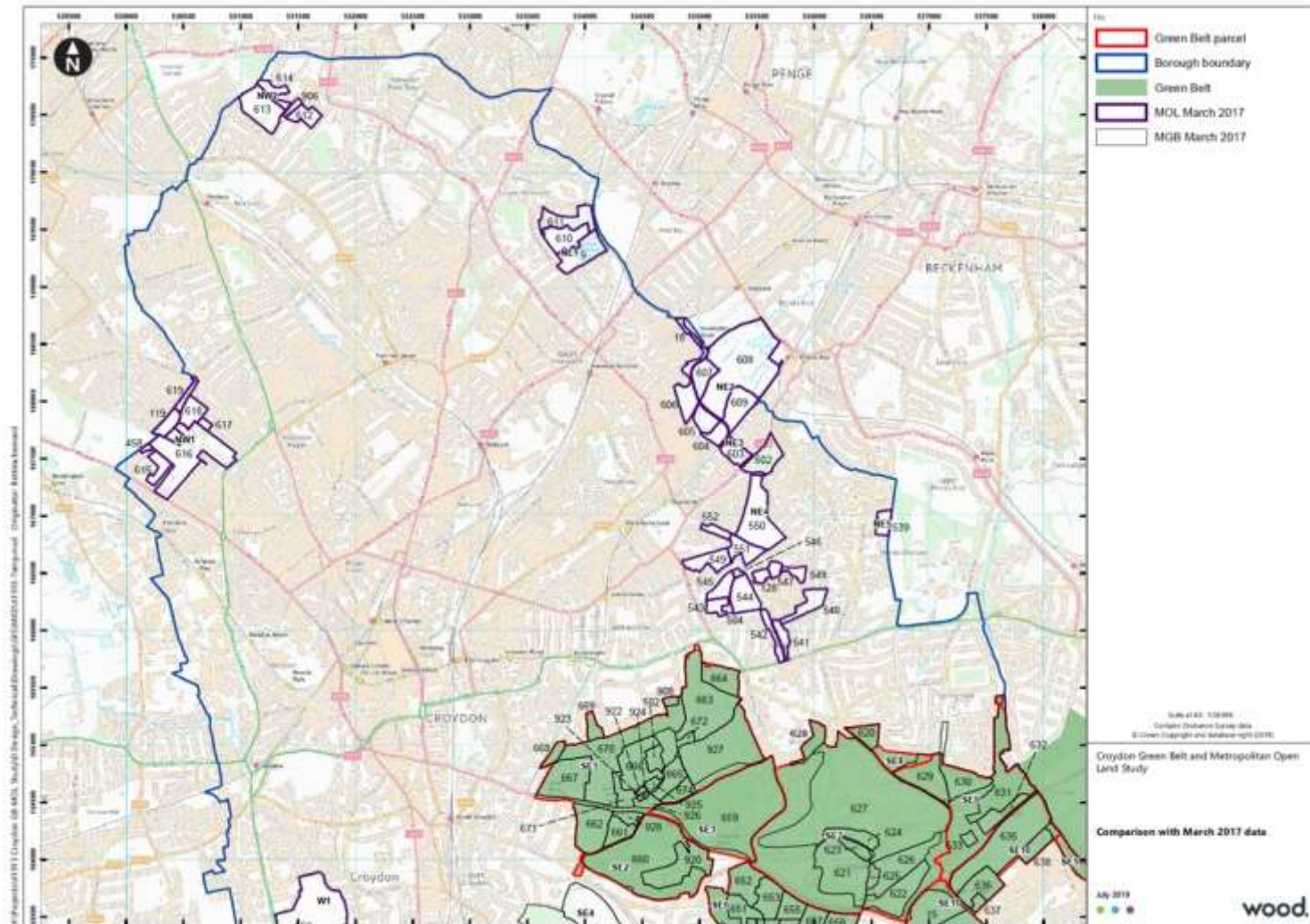
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Appendix D Relationship between 2016 Study Parcels and 2019 Assessment Parcels

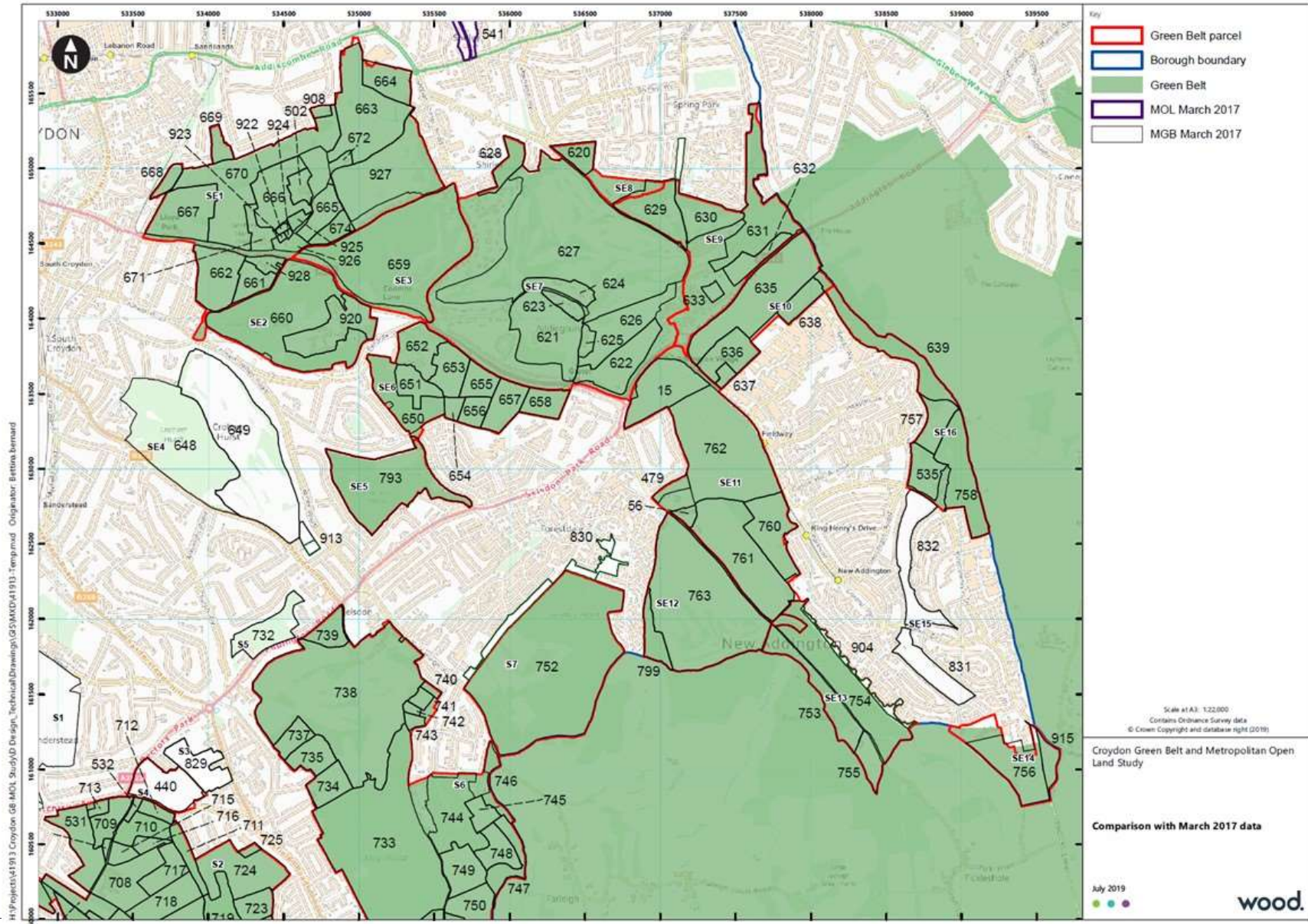
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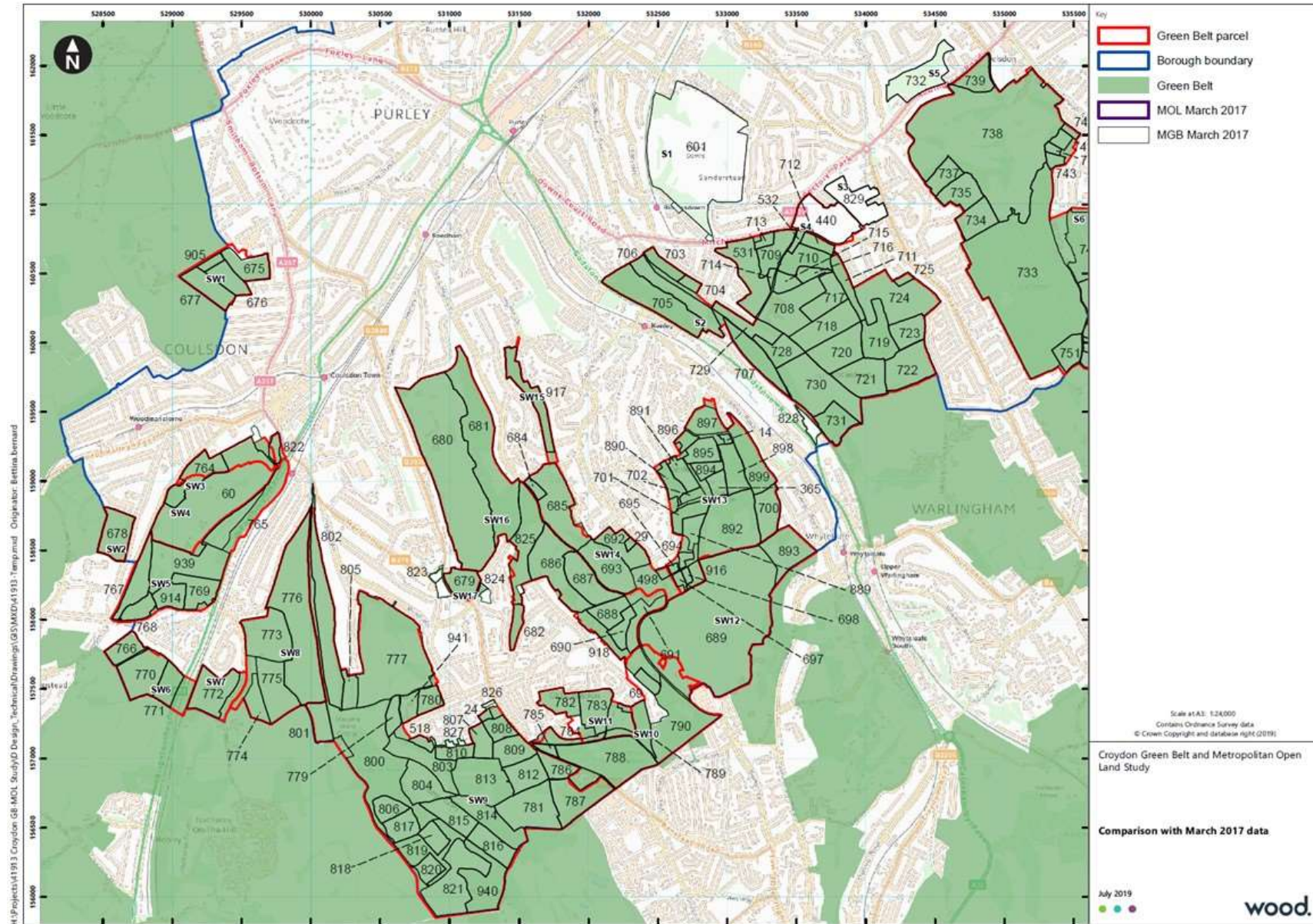
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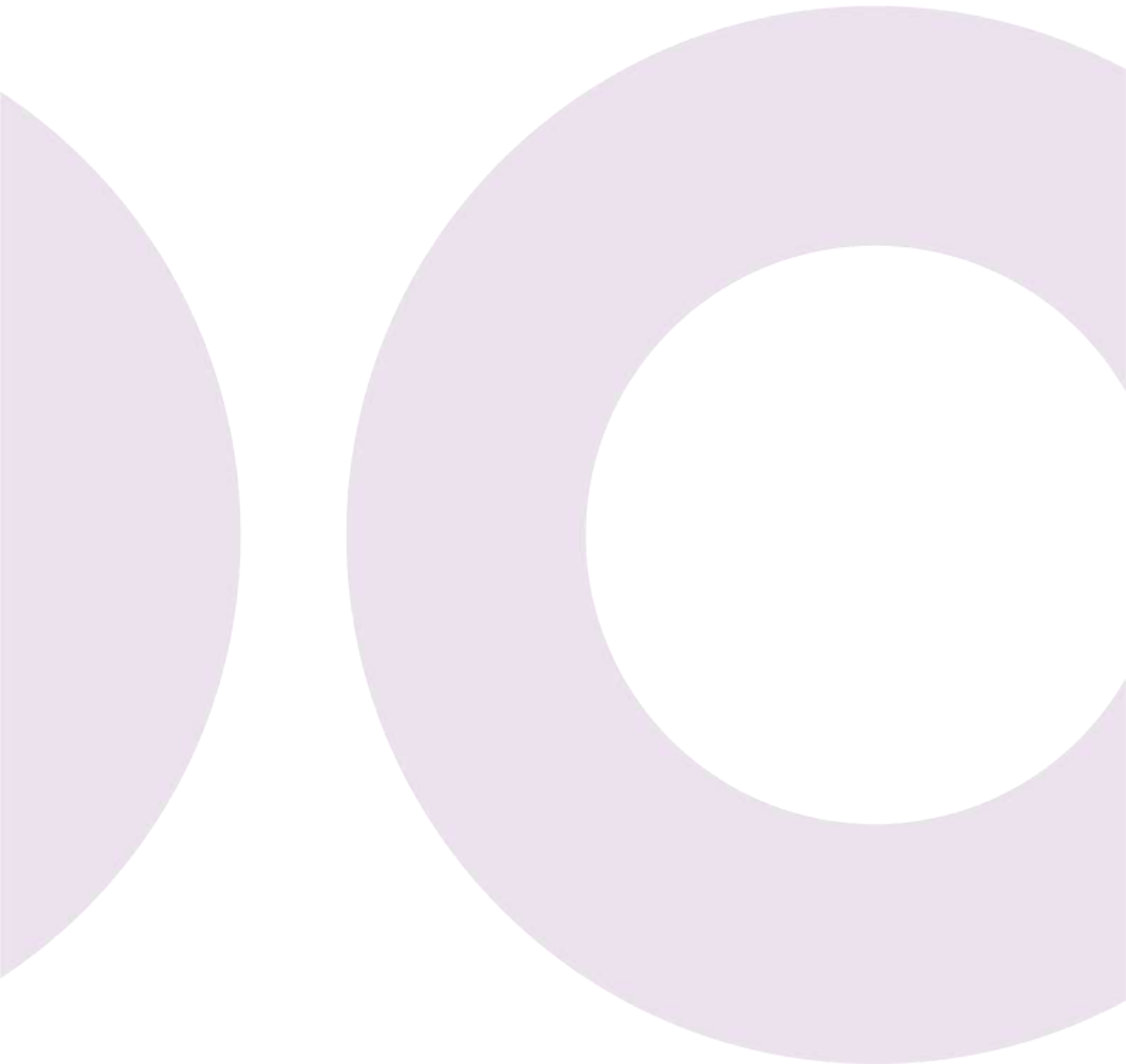




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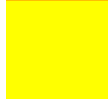




Technical note:

Croydon Sites Appraisal

1. Background

1. As part of the preparation of the Local Plan, a number of sites which are currently classed as Green Belt or MOL have been identified as holding potential for development. This Technical Note reports on the likely effects of the development of these sites on the Green Belt and Metropolitan Open Land (MOL), with reference to recent Planning Practice Guidance (see Appendix).
2. In total 31 sites have been assessed using two proformas (see below), drawing on the strategic assessment of Green Belt purposes and fulfilment of MOL criteria. In policy terms, Green Belt and MOL are treated in the same way. The professional judgements made are intended to be used in combination with other planning factors to determine overall suitability for site development.
3. The likely degree of harm to the Green Belt and MOL is summarised by the following seven-point scale, reflecting the application of professional judgement in the light of the likely effects of development on its openness and permanence. It is assumed that development will be low-rise residential or commercial.

Degree of Effect	Criteria
 Significant	Clear adverse effects of development on physical and/or visual openness and permanence which is unlikely to be able to be mitigated.
 Moderate to Significant	Adverse effects of development on physical and/or visual openness and permanence with potential opportunities for mitigation.
 Moderate	Mixed effects of development on physical and/or visual openness and permanence with opportunities for mitigation.
 Moderate to Limited	Lesser effects of development on physical and/or visual openness or permanence, with clear opportunities for mitigation.
 Limited	No discernible effect of development on physical and/or visual openness and permanence.

4. The degree of harm which is likely to arise as a result of development can, in principle, be open to mitigation of those effects through, for example, detailed masterplanning proposals (see Appendix for recent Planning Practice Guidance).



2. Assessment Proformas

- The following proformas are used to appraise the likely effects of development. Table 1 considers the site-specific quality of the Green Belt and MOL. In some instances, this is co-extensive with the strategic parcel within which it sits; here the strategic assessment is reproduced. Where the site is of significantly smaller extent, a bespoke assessment is set out.
- Table 2 sets out the template used to determine professional judgement on the likely effects of development on the Green Belt and Table 3 the criteria used to assess openness and permanence.

Table 1: Site Assessment Proforma

Location Map and Aerial			
Site Description (land use, condition, degree of openness, boundary quality)	XX		
	Visual Openness	Physical Openness	Boundary Quality
	XX	XX	XX
Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative		
To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>			
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>			
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>			
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>			

Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Narrative stating the likely degree of harm to the Green Belt on a five-point scale as: significant, moderate to significant, moderate, moderate to limited or limited , reflecting the meeting of Green Belt purposes of the site and the strategic parcel(s) affected and the likely impact of development on openness.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Narrative reflecting opportunities to employ strategic and local measures such as landscaping to mitigate the impacts of development on openness.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Narrative, reflecting the relationship of the site with its wider Green Belt context.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Narrative in light of site-specific context.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Narrative based on the above assessment.

Table 3: Criteria used in the Assessment of Visual and Physical Openness and Boundary Quality

Visual Openness	High	Clear, middle and long-distance views across the land.
	Mixed	Partially enclosed (e.g. by landform, vegetation or built form) but with views in/out.
	Low	Flat, surrounded by trees and vegetation.
Physical Openness	High	No built form or very limited urbanising influences.
	Mixed	Some built form, but not a defining feature.



	Low	Existing development and urban influences a prominent, defining element.
Quality of Boundaries (permanence)	Strong	Prominent physical features (roads, railways, buildings/urban edge).
	Moderate	Less robust physical features (paths/tracks, watercourses, woodlands, hedgerows).
	Weak	No definable boundary on the ground.

3. Summary of Results

7. The following judgements are made on 31 sites (clusters of sites):

Likely Degree of Harm	Number of Sites (clusters)	Sites (clusters)
Significant	8	927; (635, 636, 638); (760, 762); 763; 498; 693; 498; 824
Moderate to Significant	13	(531, 532, 712, 713); 440; 723; (735, 737); 755; (651, 653, 654, 655, 657, 658); (905, 676, 677); Un-numbered site; 772; 745; 738 (part); (694, 695, 697, 698, 916); (767, 768, 769, 914)
Moderate	3	(740, 741, 742, 743); 764; 535
Moderate to Limited	7	119; (24, 826); 661; 518; 603; 56; 29
Limited	0	-

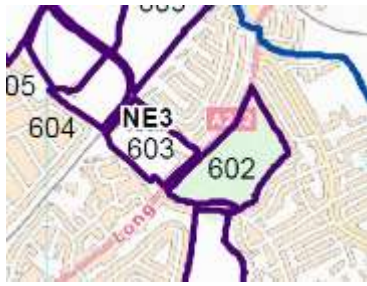
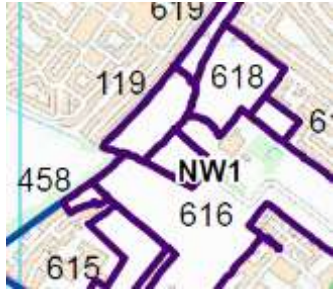
8. Table 4 sets out the results of the assessment of sites which have been identified for detailed appraisal.


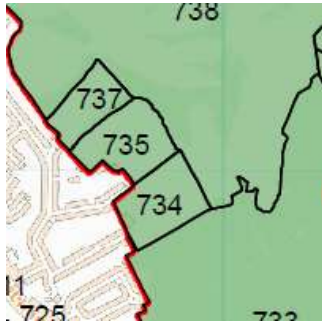


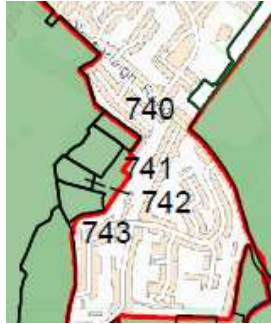
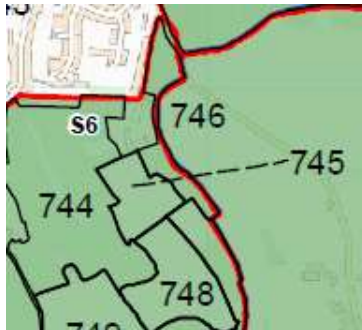
Table 4: Summary of Results of the Appraisal of Contribution to the Green Belt and MOL and Likely Degree of Harm Resulting from Development



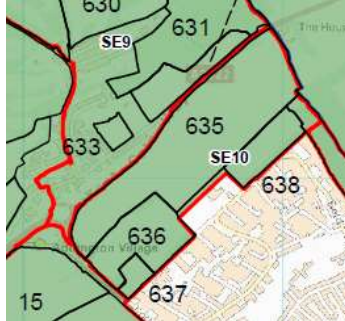
Colour key to degree of harm

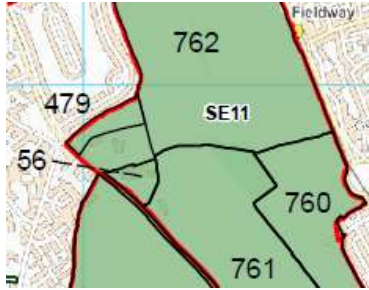
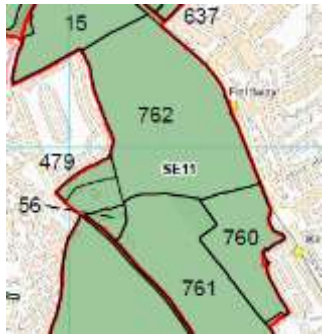
Significant	Moderate to Significant	Moderate	Moderate to Limited	Limited

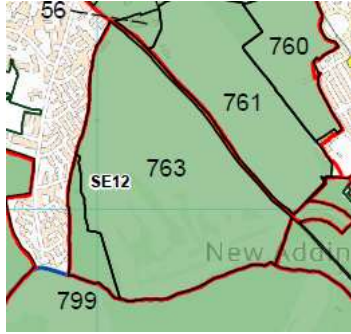


Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
MOL1	603	NE3		The parcel's role as MOL is limited to its potential role as part of a strategic corridor within the ALGG. The precise nature of this role would have to be determined.	Development of the land would result in Moderate to Limited harm to MOL, reflecting its high degree of containment and limited visual connection with the wider MOL to north and south. However, the land is part of a strategic corridor of the ALGG, although the precise nature of this function would have to be determined.
MOL2	119	NW1		The site overall makes a Contribution to MOL criteria, reflecting its size, location and land use.	Development of the land would result in Moderate to Limited harm to MOL, being an erosion of its extent and loss of function. However, the degree of damage is mitigated by the enclosed character of the site and its separation from the wider MOL to the east (allotments and a sports pitch), the south (Croydon Cemetery) and west (Mitcam Common).


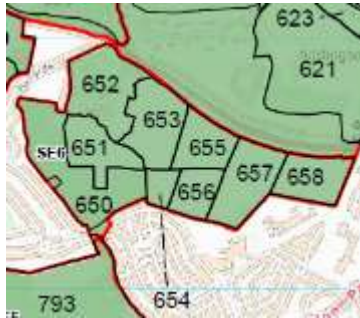
Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB2	723	S2		The site makes a Significant Contribution to Green Belt purposes, part of wider land which prevents the further sprawl of unbounded development at Sanderstead, as well as part of wider land that maintains openness between Kenley, Purley and Sanderstead.	Development is judged to result in a Moderate to Significant degree of harm , reflecting erosion of the Green Belt which is strategically significant in containing sprawl and encroachment and maintaining separation. Whilst the site is comparatively small and visually contained, it is part of wider open countryside which is sensitive and vulnerable to incremental erosion.
GB3	735, 737	S6		The sites are part of Green Belt which contains Sanderstead and Selsdon with an unbounded internal character which makes a Significant Contribution to both preventing the further sprawl of development and maintaining the openness of the land which retains a semi-rural character.	Development would result in a Moderate to Significant degree of harm to the Green Belt, removing openness by extending the established built edge of Sanderstead into open land. Whilst the sites are of relatively modest size, and not generally visible, development would be a clear intrusion on openness and incongruous with the land use of the wider parcel.


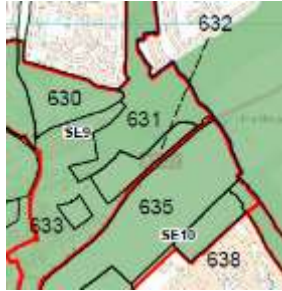
Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB4	740, 741, 742, 743	S6		The sites are part of Green Belt which contains Sanderstead and Selsdon with an unbounded internal character which makes a Significant Contribution to both preventing the further sprawl of development and maintaining the openness of the land which retains a semi-rural character.	Development is judged to result in a Moderate harm to the Green Belt, reflecting the broadly enclosed nature of the site, physically and visually, tempered by the presence of an indistinct external boundary which is enclosed by a woodland belt of varying depth. Development would represent a rounding off of the current development footprint.
GB5	745	S6		The site is part of Green Belt which contains Sanderstead and Selsdon with an unbounded internal character which makes a Significant Contribution to both preventing the further sprawl of development and maintaining the openness of the land which retains a semi-rural character.	Development of the site would be an extension to existing built development off Beech Way which is currently washed over by Green Belt. Introduction of further development is judged to result in Moderate to Significant harm , reflecting the unbounded intrusion of development into open land. Removal of Green Belt policy would create an 'island of development' which would be incongruous.


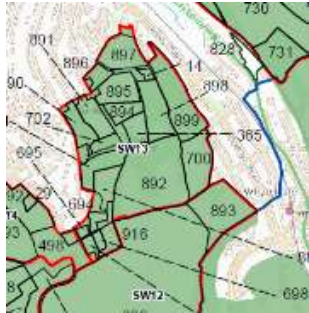
Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB6	738 (part)	S6		The site is part of Green Belt which contains Sanderstead and Selsdon with an unbounded internal character which makes a Significant Contribution to both preventing the further sprawl of development and maintaining the openness of the land which retains a semi-rural character.	Development of the site would result in Moderate to Significant harm , reflecting the loss of openness and unbounded character of the site, tempered by the presence of built development which reduces physical and visual openness.
GB7	927	SE1		The parcel, despite having diverse land uses, maintains a high degree of openness and countryside character, preventing encroachment into this open land and containing the urban edge of Shirley.	Development of this site would result in Significant harm to the Green Belt, reflecting the loss of openness which could not readily be mitigated and not be contained by substantial external boundaries. A significant proportion of the wider parcel would be lost, compromising the Green Belt functions of containing sprawl and preventing encroachment.
GB8	635, 636, 638	SE10		The parcel makes a Significant Contribution to Green Belt purposes through role in preventing encroachment as well as acting as the context for Addington Village.	Development of the site would result in Significant harm to the Green Belt in this location, the result of a reduction in openness which could not be readily ameliorated. This effect would be amplified by topography of the site and the extent of existing urbanisation of land in the vicinity currently washed over by Green Belt.

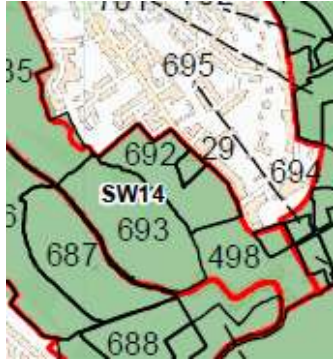
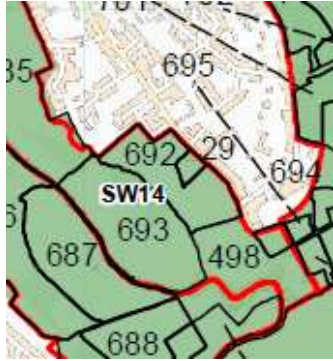
Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB9	56	SE11		The site makes a Contribution to the Green Belt as part of wider land which prevents sprawl and maintains separation. The size and enclosure of the site lessens the role.	Development is likely to result in Moderate to Limited harm to the Green Belt, reflecting the previously developed nature of the land and its scale, countered by the absence of clear boundaries to contain the development over the longer term.
GB10	760, 762	SE11		The parcel makes a Significant Contribution to Green Belt purposes through role in preventing sprawl and encroachment and maintaining separation, as well as acting as part of the context for Addington Village.	Development would result in Significant harm to the Green Belt, removing open land which makes a Significant Contribution to containing sprawl, encroachment into open countryside and maintaining separation between Selsdon and New Addington. The external boundaries to the sites are not substantial to ensure long term containment.

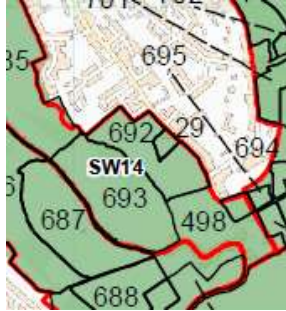
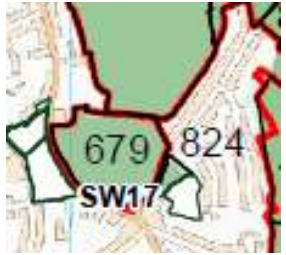

Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB11	763	SE12		The parcel makes a Significant Contribution to Green Belt purposes through role in preventing sprawl and encroachment and maintaining separation.	Development would result in Significant harm to the Green Belt, removing open land which functions to contain sprawl associated with the outer suburbs of Croydon at Selsdon/Forestdale, and maintain separation between these suburbs and New Addington. The existing landscape structure could assist amelioration.
GB12	755	SE13		Whilst the site is of a semi-developed character, it is nevertheless part of the open countryside which acts in combination with Green Belt in Tandridge District preventing encroachment.	The impact of development on this site is judged to result in Moderate to Significant harm to the Green Belt, reflecting the intrusion of built form into open countryside. Whilst the site is currently partially developed, intensification of built form would constitute intrusion open countryside from a site which is largely unbounded.
GB13	535	SE16		The site, whilst of modest size, contributes to maintaining the openness of land in this locality.	The degree of harm to the Green Belt resulting from development is judged to be Moderate , reflecting a combination of the open but largely bounded character of the site. The visual prominence of the site is an issue which would require particular attention.

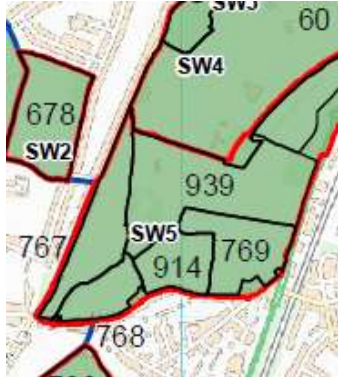

Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB14	661	SE1		The site is part of wider open countryside (albeit intruded with various forms of built development) and as such makes a Contribution to the maintenance of openness.	Development of the site is judged to result in Moderate to Limited harm to the Green Belt, reflecting its previously developed and visually enclosed character, moderated by the loss of openness of an isolated site and the absence of a clear western boundary.
GB15	651, 653, 654, 655, 657, 658	SE6		The parcel prevents the further sprawl of development along the A212 and helps to maintain a degree of openness and countryside character.	Development of this suite of sites as a whole would result in Moderate to Significant harm to the Green Belt, arising from the removal of openness from exposed land which prevents sprawl and encroachment. The extent of removal of land associated with the sites, boundary issues to the west, limited opportunity for mitigation and the creation of 'remnant' Green Belt add up to the judged degree of harm.


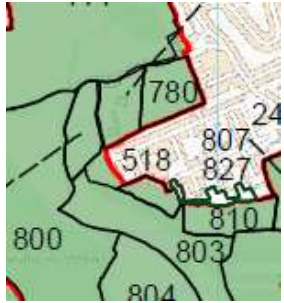
Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB16		SE7		Whilst the land is developed for residential and leisure development, its low density means that the Green Belt prevents intensification of sprawl and continued separation adjacent built up areas. As such overall the land makes a Significant Contribution to the Green Belt.	Development through intensification of this low to medium density residential land would result in Moderate to Significant harm to the Green Belt, reflecting the role of this land in preventing further sprawl and separation of large built areas. De-designation would result in severance of the Green Belt with attendant effects on openness.
GB17	632	SE9		The parcel makes a Significant Contribution to Green Belt purposes through role in preventing further sprawl and encroachment as well as acting as the context for Addington Village.	Development would result in Significant harm to the Green Belt, notwithstanding the sites relatively small scale. However, the its detached location and unbounded character would create localised sprawl and encroachment which could not be ameliorated.

Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB18	905, 676, 677	SW1		Significant Contribution. The parcel is part of wider Green Belt land within Sutton Borough which together act to prevent the westward sprawl of Purley into open countryside, as well as preventing incremental change in an area with no substantive boundaries to contain development.	Development would result in Moderate to Significant harm to the Green Belt as a result of the extension of the urban edge into open land, compromising the wider Green Belt function of containment. Green Belt to the east would be isolated and therefore redundant.
GB19a	694, 695, 697, 698, 916	SW13		The land forms part of the remaining gap between Purley, Caterham and Warlingham, containing these settlements and protecting open countryside from encroachment.	Development of these parcels as a whole will result in Moderate to Significant harm to the Green Belt, constituting an extension of the large built-up area southwards, in addition requiring the removal of low density properties from the Green Belt.

Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB19b	693	SW14		The parcel is an important part of remaining open land in this locality, containing adjacent suburban development and connected to wider open land to the south and west. The land is part of the wedge between Coulsdon/Old Coulsdon and Kenley and overall makes a Significant Contribution to Green Belt purposes.	Development is judged to result in Significant harm to the Green Belt, resulting from the intrusion of a large site into Green Belt which prevents sprawl, encroachment and maintains separation.
GB19c	29	SW14		The site makes a Contribution to the Green Belt by virtue of its location within a wider parcel which makes a significant contribution to preventing sprawl, encroachment and merger. The site's relatively small and enclosed character means the contribution is modest but nevertheless present, physically and in principle.	Development of the site through presumed intensification of development would result in Moderate to Limited harm to the Green Belt, reflecting physical intrusion and effect on openness. Whilst the site is visually enclosed, there would still be damage to the openness of the Green Belt meaning that development through Very Special Circumstances is more appropriate than release.

Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB19d	498	SW14		The parcel is an important part of remaining open land in this locality, containing adjacent suburban development and connected to wider open land to the south and west. The land is part of the wedge between Coulsdon/Old Coulsdon and Kenley and overall makes a Significant Contribution to Green Belt purposes.	Development is judged to result in Significant harm to the Green Belt, resulting from the intrusion of a large site into Green Belt which prevents sprawl, encroachment and maintains separation.
GB20	824	SW17		The site is locally significant through its role as part of the Old Coulsdon Conservation Area, therefore making a Significant Contribution. The land could be protected through the use of other designations.	Loss of physical and visual openness would lead to Significant harm to the Green Belt in this location which could not be mitigated.
GB21	764	SW3		The land is of a size and location which limits its Green Belt role, emphasised by the redevelopment of land at Cane Hill which encloses the parcel. Nevertheless, there remains a quality of visual and physical openness which means the land retains a limited Green Belt role.	Development is judged to result in Moderate harm to the Green Belt, reflecting the size and isolated character of the site which is offset by its relatively high degree of exposure. Development would require the de-designation of adjacent Green Belt.


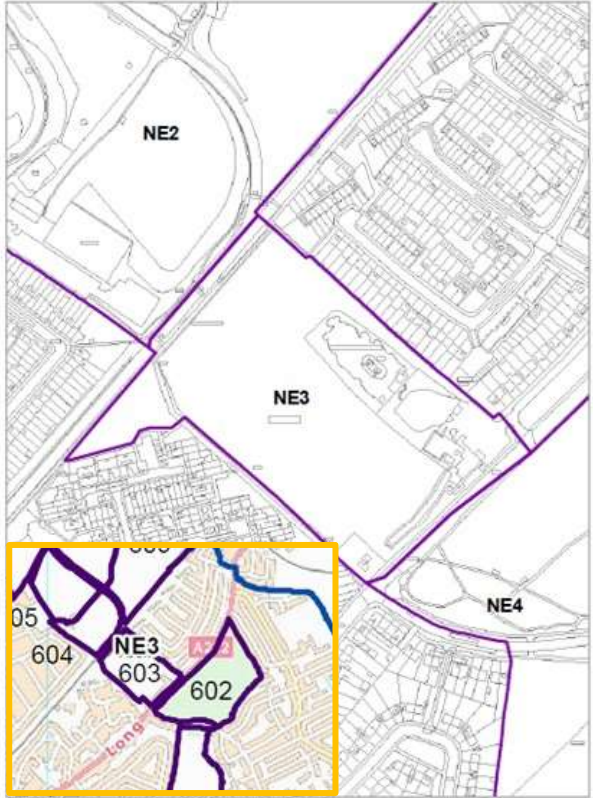
Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB22	767, 768, 769, 914	SW5		The land is of a substantial scale which retains the quality of open countryside despite being isolated by built development. Despite being visually enclosed from surrounding roads, with no public access, there are clear views into the parcel from Farthing Down which confirm its open character. Consequently, the Green Belt serves to prevent localised sprawl and encroachment.	Development of these sites would cause Moderate to Significant harm to the Green Belt in this location, compromising visual and physical openness, and constituting localised sprawl and encroachment. Remaining Green Belt to the north would become isolated and lose its function.
GB23	772	SW7		Significant Contribution. The land forms part of the southwestern edge of Coulsdon, preventing sprawl and protecting open countryside from encroachment.	Development of the site would result in Moderate to Significant harm to the Green Belt, reflecting the role of the land in containing the built edge of Coulsdon. Development would add to localised sprawl along the A23 corridor and constitute encroachment into the countryside in this location. Notwithstanding the presence of development to the north and east, development would be difficult to mitigate on this exposed site.

Site number for Stage 2 Review	Site Number in previous GB/MOL review	Within Parcel	Site Map	Overall Green Belt/MOL Contribution	Likely Harm to the Green Belt/MOL
GB24	24, 826	SW9		Notwithstanding the size and degree of visual enclosure of the sites, they nevertheless make a Contribution to the Green Belt through preventing both sprawl and encroachment as part of the wider open countryside in this location.	Development of these sites would result in Moderate to Limited harm to the Green Belt, reflecting the enclosed visual character of the site and the rounding off of settlement form, balanced by the absence of a significant external boundary.
GB25	518	SW9		The Green Belt in this location is part of the transition to open countryside to the southwest. While it has the character of amenity grassland associated with adjacent properties, the site nevertheless makes a Contribution to the Green Belt.	Development of this site would result in Moderate to Limited harm to the Green Belt, reflecting the enclosed visual character of the site and the rounding off of settlement form, balanced by the absence of significant external boundaries.

4. Site Assessment Proformas

MOL1, Site 603, MOL Parcel NE3

Table 1: Site Assessment Proforma

Location Map and Aerial			
 <p>© Gemapping plc.</p>		 <p>© Crown Copyright. All rights reserved. Licence number AL100001776.</p>	
<p>Site Description (land use, condition, degree of openness (visual and physical); boundary quality)</p> <p>Maintained grass land as a golf facility.</p>	<p>Visual Openness</p> <p>Low - Mixed</p> <p>There are no clear views across because of bunding rising to c.8m.</p>	<p>Physical Openness</p> <p>High - Mixed</p> <p>Some built development associated with a golf facility.</p>	<p>Boundary Quality</p> <p>High</p> <p>Bounded by built development to southwest and northwest, tramway to northwest and Long Lane to southeast.</p>



MOL Criteria	Contribution to MOL Criteria / Explanation
	Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>Contributes to the physical structure of London</p> <p><i>Is the parcel clearly distinguishable from the adjacent built-up area and thereby making a clear contribution to the physical structure of London?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>The land has only the most limited role in providing structure for London, being the remnant gap between Woodside and Elmers End.</p>
<p>Includes recreation and other facilities serving either the whole or significant parts of London</p> <p><i>Does the parcel include sport, recreation, leisure and cultural facilities which are of strategic importance?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>The golf driving range is not a recreational facility of strategic importance but may be local importance.</p>
<p>Contains features of national or metropolitan value</p> <p><i>Does the parcel contain features or landscapes (historic, recreational, biodiversity) which are of national or metropolitan value?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>The parcel does not contain features of national or metropolitan value.</p>
<p>Is part of Green Infrastructure</p> <p><i>Is the parcel part of a Green Chain or acts as a link in the network of Green Infrastructure?</i></p>	<p>CONTRIBUTION</p> <p>The parcel is part of a strategic link of the ALGG.</p>
<p>Overall Assessment of Contribution to MOL Criteria</p> <p><i>In light of the judgements made on individual criteria, what is the overall contribution of the site to MOL?</i></p>	<p>CONTRIBUTION</p> <p>The parcel's role as MOL is limited to its potential role as part of a strategic corridor within the ALGG. The precise nature of this role would have to be determined.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the MOL of removing the site from it?	Development would result in a Moderate to Limited degree of harm to MOL, reflecting the potential role of the land as part of the ALGG and to a lesser extent, removal of part of its function as a local sports facility. Whether there are equivalent facilities in the locality is not known. The land is separated from the wider MOL to the north and south by clear boundaries (hedgerow/fencing).

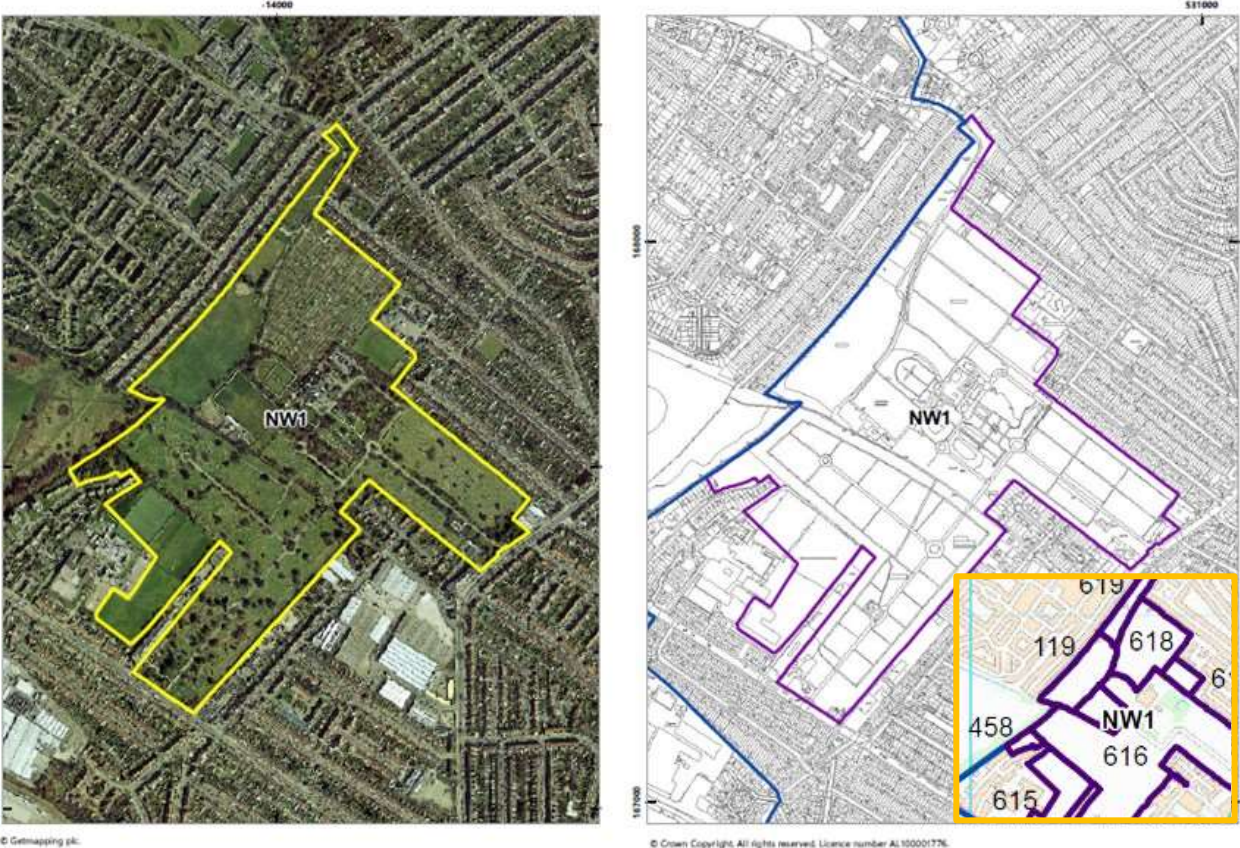


Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the MOL be ameliorated or reduced to the lowest reasonably practicable extent?	Boundary landscaping could be applied to the outer extent of the site.
If this site were to be developed would the adjacent MOL continue to serve at least one MOL criteria, or would the MOL function be undermined by the site's development?	Adjacent MOL to the north (South Norwood Country Park) and south (Long Lane Wood/Ashburton Playing Fields). These areas of MOL would continue to serve their function as MOL.
Can a boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	The site is clearly bounded on all sides. It is assumed that development would comprise the entire site.
Overall Conclusions on the Likely Effects on the MOL of Site Development	Development of the land would result in Moderate to Limited harm to MOL, reflecting its high degree of containment and limited visual connection with the wider MOL to north and south. However, the land is part of a strategic corridor of the ALGG, although the precise nature of this function would have to be determined.



MOL2, Site 119, MOL Parcel NW1

Table 1: Site Assessment Proforma

Location Map and Aerial			
 <p>The figure consists of two maps. The left map is an aerial photograph with a yellow outline highlighting a specific area labeled 'NW1'. The right map is a street map of the same area, with the 'NW1' area outlined in purple. A yellow box on the street map highlights a specific cluster of buildings, with labels 119, 618, 616, 615, 458, and 619. The 'NW1' label is also present on the street map.</p>			
<p>Site Description (land use, condition, degree of openness (visual and physical); boundary quality)</p> <p>Maintained open grassland, formerly sports pitches.</p>	<p>Visual Openness</p> <p>Mixed</p> <p>Enclosed by built development and hedgerows; interrupted views outwards.</p>	<p>Physical Openness</p> <p>High</p> <p>No built development within.</p>	<p>Boundary Quality</p> <p>Mixed – High</p> <p>Built development to the northwest, otherwise variously hedgerows and Mayfield Road.</p>



MOL Criteria	Contribution to MOL Criteria / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>Contributes to the physical structure of London</p> <p><i>Is the parcel clearly distinguishable from the adjacent built-up area and thereby making a clear contribution to the physical structure of London?</i></p>	<p>CONTRIBUTION</p> <p>The site, by virtue of its scale and location makes a modest, localised contribution to the structure of London.</p>
<p>Includes recreation and other facilities serving either the whole or significant parts of London</p> <p><i>Does the parcel include sport, recreation, leisure and cultural facilities which are of strategic importance?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>The site contains local recreational facilities only.</p>
<p>Contains features of national or metropolitan value</p> <p><i>Does the parcel contain features or landscapes (historic, recreational, biodiversity) which are of national or metropolitan value?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>The parcel contains no features of national or metropolitan value.</p>
<p>Is part of Green Infrastructure</p> <p><i>Is the parcel part of a Green Chain or acts as a link in the network of Green Infrastructure?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>The site is not part of the ALGG.</p>
<p>Overall Assessment of Contribution to MOL Criteria</p> <p><i>In light of the judgements made on individual criteria, what is the overall contribution of the site to MOL?</i></p>	<p>CONTRIBUTION</p> <p>The site overall makes a Contribution to MOL criteria, reflecting its size, location and land use.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the MOL of removing the site from it?	Development would result in Moderate to Limited degree of harm to MOL, reflecting the removal of part of its function as a local sports facility. Whether there are equivalent facilities in the locality is not known. The land is separated from the wider MOL by clear boundaries (hedgerow/fencing).
To what extent could the consequent impacts on the purposes of the MOL be ameliorated or reduced to the lowest reasonably practicable extent?	Boundary landscaping could be applied to the outer extent of the site.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
If this site were to be developed would the adjacent MOL continue to serve at least one MOL criteria, or would the MOL function be undermined by the site's development?	Adjacent MOL to the east (allotments and a sports pitch), to the south (Croydon Cemetery) and west (Mitcham Common) would continue to function as MOL.
Can a boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	The site is bounded by Mayfield Road to the east, property boundaries to the west and a mature hedgerow to the south, beyond which is Croydon Cemetery. It is assumed that development would comprise the entire site.
Overall Conclusions on the Likely Effects on the MOL of Site Development	Development of the land would result in Moderate to Limited harm to MOL, being an erosion of its extent and loss of function. However, the degree of damage is mitigated by the enclosed character of the site and its separation from the wider MOL to the east (allotments and a sports pitch), the south (Croydon Cemetery) and west (Mitcham Common).



GB1a, Site 440, GB Parcel S4

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>The figure consists of two maps side-by-side. The left map is an aerial photograph showing a large grassy field (S4) bordered by residential areas (S3) and a wooded area (S2). The right map is a cadastral plan showing the same area with property boundaries and lot numbers. An inset map shows a wider context of the site within a residential area, with lot numbers 712, 532, 829, 713, 531, 709, 710, 717, 708, and 440 visible. The site S4 is highlighted in green in both maps.</p>			
<p>Site Description (land use, condition, degree of openness – visual and physical), boundary quality</p> <p>Improved grassland; landform is steeply sloping over 50m southwestwards to Mitchley Hill.</p>	<p>Visual Openness</p> <p>High</p> <p>Long distance views southward.</p>	<p>Physical Openness</p> <p>High</p> <p>No built development within.</p>	<p>Boundary Quality</p> <p>High - Mixed</p> <p>Bordered by built development, roads (Rectory Park, Mitchley Hill) and a hedgerow to the north.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	CONTRIBUTION The land is well-bounded on three sides which strategically prevents localised sprawl.
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	NO CONTRIBUTION The land performs no separation role.
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	CONTRIBUTION The land is part of open countryside to the south of Sanderstead, a relationship emphasised by the scale and orientation of the site, offering an expansive vista southwards from Borrowdale Drive.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	NO CONTRIBUTION There is no Conservation Area in the vicinity.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	CONTRIBUTION Whilst the parcel is bounded on all sides and part of the footprint of Sanderstead, its scale and orientation/exposure mean that a connection with the wider countryside and contribution to openness is maintained.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development would result in Moderate to Significant harm to the Green Belt, reflecting the exposed character of the land and the complete



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
	removal of openness with limited opportunity for amelioration.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The principal Green Belt issue associated with this site is its degree of exposure, being a steeply sloping site with a high degree of visual openness. Development, apart from boundary treatment, could not be mitigated visually but would be a clearly contained extension of existing built form.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The Green Belt to the south across Mitchley Hill would continue to perform its functions of preventing sprawl and encroachment.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	The site is well bounded on all sides.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Whilst the site is of a moderate scale and well bounded on all sides, it has a high degree of visual exposure which makes mitigation challenging. Development is judged to result in Moderate to Significant harm on the Green Belt, reflecting the clear loss of openness on a visually sensitive slope but ameliorated by the contained character of the site and extension of surrounding built form.



GB1b, Sites 531, 532, 712, 713, GB Parcel S2

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness – visual and physical), boundary quality</p> <p>These sites comprise pasture (531, 713, 532) and scrub (712).</p>	<p>Visual Openness</p>	<p>Physical Openness</p>	<p>Boundary Quality</p>
	<p>High - Mixed</p> <p>All sites are on the north-facing slope of land which rises southward towards the plateau of Riddesdown. As such they are exposed to land to the north of the A2022. Mitchley Wood provides a degree of enclosure to the south (east in the case of site 531) along with a school to the south.</p>	<p>High</p> <p>There is no development within these sites.</p>	<p>Mixed – Low</p> <p>All sites are bordered by the clear boundary of the A2022 to the north. Mitchley Wood forms a boundary of all the parcels to a greater or lesser extent.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	SIGNIFICANT CONTRIBUTION The various built edges to the east and west, many of which are unbounded, are contained by this land.
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	SIGNIFICANT CONTRIBUTION The land forms the principal separation between Kenley, Purley and Sanderstead.
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	SIGNIFICANT CONTRIBUTION The land, in general, has an open countryside character which is a part of a wedge of higher ground extending from open countryside to the south. The land plays a significant role in preventing Incremental change to this character.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	NO CONTRIBUTION There is no Conservation Area in the vicinity.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	SIGNIFICANT CONTRIBUTION The parcel makes a Significant Contribution to Green Belt purposes, preventing the further sprawl of development from the suburbs of Sanderstead and Purley as well as maintaining openness between Kenley, Purley and Sanderstead.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of these sites would result in Moderate to Significant harm to the Green Belt, reflecting the introduction of built form into

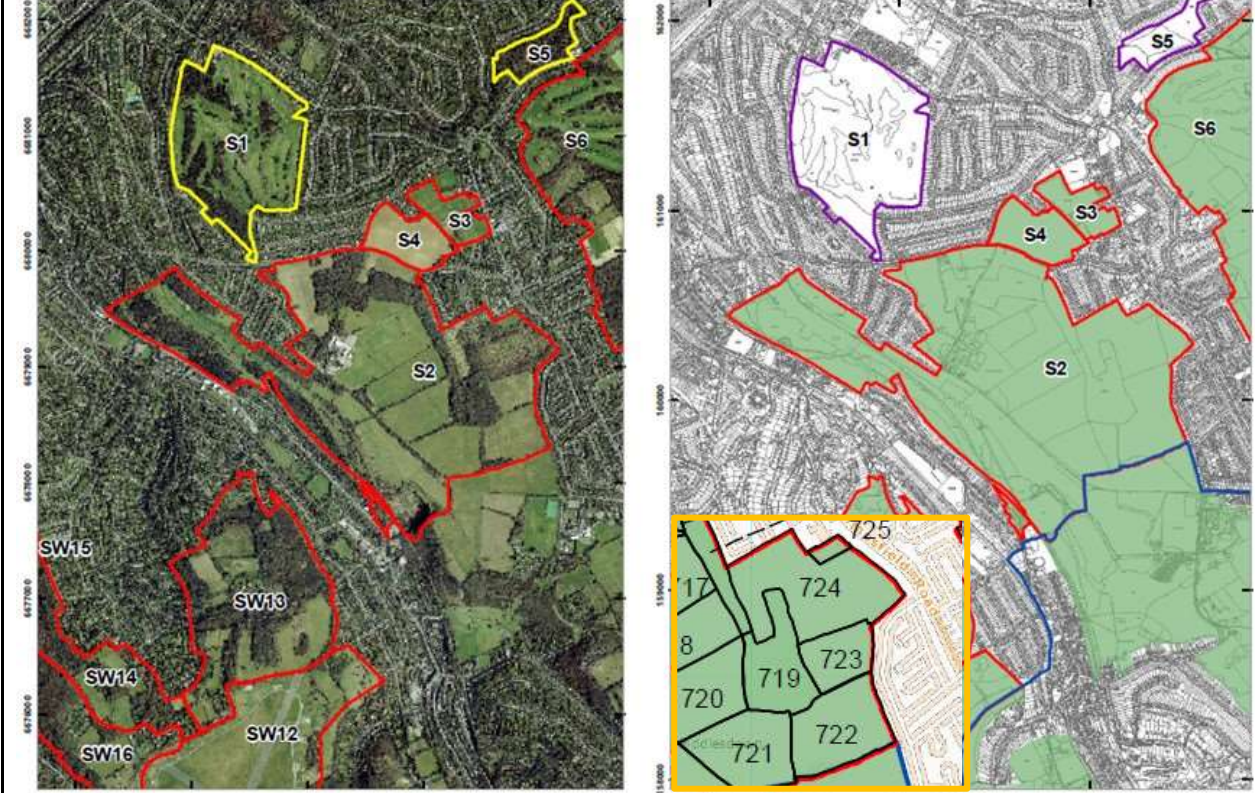


Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
	open countryside, which is of an incoherent form on an exposed north-facing slope with limited substantive boundaries to contain long-term development.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Whilst boundary strengthening, particularly along the A2022 could be employed which would some direct visual impacts, the overall effect on physical and visual openness could not be mitigated.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt to the south of these sites would continue to serve functions of preventing sprawl and encroachment, although intrusion into the parcel without clear internal boundaries (i.e. more substantial than Mitchley Wood) would undermine the largely undeveloped character of the land.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Generally, the sites can be defined by the woodland edge of Mitchley Wood, but this is a relatively weak boundary, potentially vulnerable to incremental erosion. The boundaries of site 531 are more substantial to the west (urban edge) and south (school).
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Whilst the sites are of a relatively modest size, their configuration, insubstantial southern boundaries and orientation on a north-facing slope means that openness would be compromised. As a whole, development would constitute sprawl into open countryside (albeit localised) and encroachment with no clear long-term containment. As such, development would have a Moderate to Significant degree of harm on the Green Belt.



GB2, Site 723, Green Belt Parcel S2

Table 1: Site Assessment Proforma

Location Map and Aerial				
 <p>The figure consists of two maps. The left map is an aerial photograph with overlaid site boundaries. Site S2 is a large green field in the center, outlined in red. Other sites S1, S3, S4, S5, and S6 are also outlined in red or yellow. Surrounding areas SW12 through SW16 are outlined in red. The right map is a topographic map of the same area, with site boundaries overlaid in various colors (red, purple, yellow). An inset map shows a grid of sites numbered 720 through 725, with site 723 highlighted in green. Both maps include coordinate axes.</p>				
<p>Site Description (land use, condition, degree of openness – visual and physical), boundary quality</p> <p>Field in use as unmanaged rough grassland. Level topography</p>	<p>Visual Openness</p> <p>Mixed</p> <p>The field in itself is of an open character, but visually enclosed to dense hedgerows, woodlands and built development.</p>	<p>Physical Openness</p> <p>High</p> <p>There is no built development.</p>	<p>Boundary Quality</p> <p>Low</p> <p>Enclosed by unmanaged hedgerows, Mitchley Wood and the built edge of Addington.</p>	



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	SIGNIFICANT CONTRIBUTION The unbounded built edge of Sanderstead to the east (Wentworth Way) is contained by this land.
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	SIGNIFICANT CONTRIBUTION The site forms part of wider land which is the principal separation between Kenley, Purley and Sanderstead.
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	SIGNIFICANT CONTRIBUTION The site is part of wider open land which plays a significant role in preventing Incremental change to this character.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	NO CONTRIBUTION There is no Conservation Area in the vicinity.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	SIGNIFICANT CONTRIBUTION The site makes a Significant Contribution to Green Belt purposes, part of wider land which prevents the further sprawl of unbounded development at Sanderstead, as well as part of wider land that maintains openness between Kenley, Purley and Sanderstead.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Harm to the Green Belt is judged to be Moderate to Significant reflecting the open character of the land which would be damaged by development and its role as part of wider open countryside in this locality.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Further boundary planting would visually enclose development on this flat site.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt would continue to perform its functions of preventing sprawl and encroachment and maintaining separation. Incremental erosion would diminish this role through fragmentation., such as Green Belt to the north.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	The boundaries to the site, whilst clearly defined are not substantive.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development is judged to result in Moderate to Significant harm, reflecting erosion of the Green Belt which is strategically significant in containing sprawl and encroachment and maintaining separation. Whilst the site is comparatively small and visually contained, it is part of wider open countryside which is sensitive and vulnerable to incremental erosion.



GB3, Sites 735, 737, Green Belt Parcel S6

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness – visual and physical), boundary quality</p> <p>Scrub encroaching on rough grassland. Undulating over 15m.</p>	<p>Visual Openness</p>	<p>Physical Openness</p>	<p>Boundary Quality</p>
	<p>Low – Mixed</p> <p>Encroaching scrub interrupts views across. Very limited views in (from Sanderstead Court Avenue only).</p>	<p>High</p> <p>No evidence of built development.</p>	<p>Mixed</p> <p>Contained by the built edge of Sanderstead to the west, a boundary with a sports facility to the south; otherwise no evidence of substantive boundaries to the north or east.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	SIGNIFICANT CONTRIBUTION This very substantial parcel forms the transition between the built-up suburbs of Selsdon and Sanderstead and open countryside to the south towards Warlingham. As such the land contains these areas from further unrestricted expansion.
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	CONTRIBUTION The land makes a Contribution to the continued separation of Sanderstead, Selsdon and Warlingham.
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	SIGNIFICANT CONTRIBUTION The land is part of open countryside to the south of Sanderstead and Selsdon which extends into Tandridge District.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	NO CONTRIBUTION There is no Conservation Area in the vicinity.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	SIGNIFICANT CONTRIBUTION The sites are part of Green Belt which contains Sanderstead and Selsdon with an unbounded internal character which makes a Significant Contribution to both preventing the further sprawl of development and maintaining the openness of the land which retains a semi-rural character.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development would result in Moderate to Significant harm to the Green Belt, removing



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
	openness by extending the established built edge of Sanderstead into unbounded open land, notwithstanding the visual enclosure of the land by scrub woodland.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Various landscaping strategies could be employed to 'conceal' the development.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt to the east would continue to prevent sprawl and encroachment in this locality.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Notwithstanding the presence of various woodland edges, there are no clear, substantive boundaries to the north or east which would contain development over the long term.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development would result in Moderate to Significant harm to the Green Belt, removing openness by extending the established built edge of Sanderstead into open land. Whilst the sites are of relatively modest size, and not generally visible, development would be a clear intrusion on openness and incongruous with the land use of the wider parcel.



GB4, Sites 740, 741, 742, 743, Green Belt Parcel S6

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness (visual and physical), boundary quality)</p> <p>Open grassland/grazing land and scrub, falling west to east over 10m.</p>	<p>Visual Openness</p>	<p>Physical Openness</p>	<p>Boundary Quality</p>
	<p>Mixed - Low</p> <p>The sites are visually enclosed by substantial tree belts.</p>	<p>High</p> <p>There is no evidence of built development.</p>	<p>Mixed – Low</p> <p>The sites are bounded by irregular property boundaries to the east, a belt of woodland to the west and property boundaries to the north and south.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	SIGNIFICANT CONTRIBUTION The sites are part of a substantial parcel which forms the transition between the built-up suburbs of Selsdon and Sanderstead and open countryside to the south towards Warlingham. As such the land contains these areas from further unrestricted expansion.
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	CONTRIBUTION The land makes a Contribution to the continued separation of Sanderstead, Selsdon and Warlingham.
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	SIGNIFICANT CONTRIBUTION The land is part of open countryside to the south of Sanderstead and Selsdon which extends into Tandridge District.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	NO CONTRIBUTION There is no Conservation Area in the vicinity.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	SIGNIFICANT CONTRIBUTION The sites are part of Green Belt which contains Sanderstead and Selsdon with an unbounded internal character which makes a Significant Contribution to both preventing the further sprawl of development and maintaining the openness of the land which retains a semi-rural character.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of these sites (taken together) would result in Moderate harm to the Green Belt, reflecting the loss of openness of strategically significant Green Belt, tempered by their semi-bounded character and



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
	the potential for rounding-off of the local development footprint.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The visually enclosed character of the sites means that impacts could be further limited by additional planting.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt to the west would continue to contain sprawl and encroachment.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Whilst the site is bounded to the north and south by property boundaries, there appears to be an indistinct eastern boundary, whilst the western boundary comprises a woodland belt with no other contiguous boundary feature.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development is judged to result in a Moderate harm to the Green Belt, reflecting the broadly enclosed nature of the site, physically and visually, tempered by the presence of an indistinct external boundary which is enclosed by a woodland belt of varying depth. Development would represent a rounding off of the current development footprint.



GB5, Site 745, Green Belt Parcel S6

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness (visual and physical); boundary quality)</p> <p>Rough grazing; largely level site off Beech Way.</p>	<p>Visual Openness</p> <p>Mixed</p> <p>Site is enclosed by a property boundary to the north, dense woodland to east and west.</p>	<p>Physical Openness</p> <p>High</p> <p>No evidence of built development.</p>	<p>Boundary Quality</p> <p>Mixed</p> <p>Property boundary, dense woodland; open to the south.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	SIGNIFICANT CONTRIBUTION The site is part of a substantial parcel which forms the transition between the built-up suburbs of Selsdon and Sanderstead and open countryside to the south towards Warlingham. As such the land contains these areas from further unrestricted expansion.
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	CONTRIBUTION The land makes a Contribution to the continued separation of Sanderstead, Selsdon and Warlingham.
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	SIGNIFICANT CONTRIBUTION The land is part of open countryside to the south of Sanderstead and Selsdon which extends into Tandridge District.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	NO CONTRIBUTION There is no Conservation Area in the vicinity.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	SIGNIFICANT CONTRIBUTION The site is part of Green Belt which contains Sanderstead and Selsdon with an unbounded internal character which makes a Significant Contribution to both preventing the further sprawl of development and maintaining the openness of the land which retains a semi-rural character.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Notwithstanding the relatively modest size of the site, the harm to the Green Belt is judged to be Moderate to Significant, reflecting the intrusion of development into open land which is not clearly bounded.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The site is already visually enclosed.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt would continue to prevent sprawl and encroachment but be compromised in this locality.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	There is no clear boundary to the south of the site, with boundaries to the east and west being woodland edges.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of the site would be an extension to existing built development off Beech Way which is currently washed over by Green Belt. Introduction of further development is judged to result in Moderate to Significant harm , reflecting the unbounded intrusion of development into open land. Removal of Green Belt policy would create an 'island of development' which would be incongruous.



GB6, Site 738 (part, Selsdon Estate), Green Belt Parcel S6

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness – visual and physical), boundary quality</p> <p>Variouly, golf course, clubhouse, hotel, leisure facilities, courts etc.</p> <p>NOTE – precise site boundaries have not been specified.</p>	<p>Visual Openness</p> <p>Mixed</p> <p>Interrupted views by substantial belts of vegetation associated with the environs of the house and golf course.</p>	<p>Physical Openness</p> <p>Mixed</p> <p>Hotel and associated buildings.</p>	<p>Boundary Quality</p> <p>Mixed – Low</p> <p>There are no apparent clear external boundaries to the southwest or south, whilst the site is clearly bounded to the northwest and northeast.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	SIGNIFICANT CONTRIBUTION The site is part of a substantial parcel which forms the transition between the built-up suburbs of Selsdon and Sanderstead and open countryside to the south towards Warlingham. As such the land contains these areas from further unrestricted expansion.
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	CONTRIBUTION The land makes a Contribution to the continued separation of Sanderstead, Selsdon and Warlingham.
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	SIGNIFICANT CONTRIBUTION The land is part of open countryside to the south of Sanderstead and Selsdon which extends into Tandridge District.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	NO CONTRIBUTION There is no Conservation Area in the vicinity.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	SIGNIFICANT CONTRIBUTION The site is part of Green Belt which contains Sanderstead and Selsdon with an unbounded internal character which makes a Significant Contribution to both preventing the further sprawl of development and maintaining the openness of the land which retains a semi-rural character.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Harm to the Green Belt is judged to be Moderate to Significant, reflecting the absence of external boundaries to the site (extent currently undefined) meaning that there is no guarantee of the



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
	containment of development over the longer term. Equally, development will damage the openness of the Green Belt, albeit ameliorated by the current presence of built development (precise mix and footprint uncertain).
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The site is already visually enclosed.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt would continue to prevent sprawl and encroachment but be compromised in this locality.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	There is no clear boundary to the southwest and south of the site.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of the site would result in Moderate to Significant harm , reflecting the loss of openness and unbounded character of the site, tempered by the presence of built development which reduces physical and visual openness.



GB7, Site 927, Green Belt Parcel SE1

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness (visual and physical); boundary quality)</p> <p>Golf course (part of Shirley Park Golf Course). Undulating landform.</p>	<p>Visual Openness</p>	<p>Physical Openness</p>	<p>Boundary Quality</p>
	<p>Mixed</p> <p>Views across interrupted by various belts of vegetation and topography.</p>	<p>High</p> <p>No built development apparent.</p>	<p>Low – Mixed</p> <p>Whilst bounded to the southeast and northeast by property boundaries, to the southwest and northwest, the boundaries are not defined by substantive physical features.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>SIGNIFICANT CONTRIBUTION The size and open character of the parcel and its containment of built edge of Croydon at Addiscombe and Shirley means that it makes a Significant Contribution to this purpose.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>LIMITED CONTRIBUTION Despite the parcel's size, there is no clear separation role.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel plays an important role in preventing incremental change within a substantial area of open land which, despite having diverse uses retains a high degree of open countryside character.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>LIMITED CONTRIBUTION The parcel plays no clear role in this respect.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel, despite having diverse land uses, maintains a high degree of openness and countryside character, preventing encroachment into this open land and containing the urban edge of Shirley.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development would result in Significant harm to the Green Belt in this location reflecting the unbounded intrusion of the built extent of Shirley into open land.

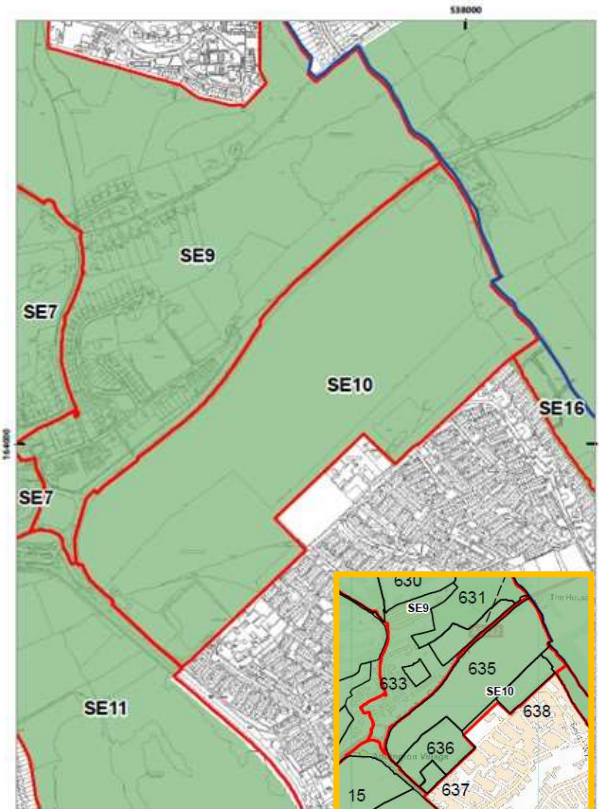


Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Whilst boundary and internal planting could ameliorate some immediate visual effects, the loss of openness and erosion of the function of the wider parcel cannot be ameliorated.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The Green Belt to the west would continue to prevent sprawl and encroachment but would be compromised in role.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Development would extend into open land with no significant features to define its extent.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of this site would result in Significant harm to the Green Belt, reflecting the loss of openness which could not readily be mitigated and not be contained by substantial external boundaries. A significant proportion of the wider parcel would be lost, compromising the Green Belt functions of containing sprawl and preventing encroachment.



GB8, Sites 635, 636, 638, Parcel SE10

Parcel Reference / Location



Description (land use, degree of openness, boundary quality)	Visual Openness	Physical Openness	Boundary Quality
<p>Arable farmland. Rising landform northwest to southeast.</p>	<p>High - Mixed Generally high, particular towards the east; topography and vegetation blocks views from the A2022 to New Addington.</p>	<p>High There is no built development.</p>	<p>High Bordered by the A2022 and the edge of New Addington. Woodland (Birch Wood) to the east, with a shared boundary with Bromley Borough.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the parcel in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>CONTRIBUTION The parcel contains the built edge of New Addington.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>CONTRIBUTION The parcel is part of wider land which maintains openness between Shirley and New Addington.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the parcel in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel is of an open countryside character, shared with Green Belt within Bromley Borough.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the parcel in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel forms the southerly context for the Addington village Conservation Area.</p>
<p>To assist in urban regeneration by encouraging the recycling of derelict and other urban land</p>	<p>NO CONTRIBUTION There is no derelict land in the vicinity.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the parcel to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel makes a Significant Contribution to Green Belt purposes through role in preventing encroachment as well as acting as the context for Addington Village.</p>



Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of the site is judged to result in Significant harm to the Green Belt, reflecting the role of the parcel in preventing encroachment into open countryside, localised sprawl along the A2022, as well locally providing the context for Addington village.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Whilst tree planting could serve to soften visual impacts, the reduction in openness cannot be ameliorated, in turn exaggerated by the rising topography towards New Addington from the A2022.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the east (within Bromley Borough) would continue to serve the function of maintaining openness, as would Green Belt to the west to containing New Addington. However, urbanisation of the locality would be apparent, particularly in light of the presence of development washed over by Green Belt at Addington village and the wider area.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	The site is clearly bounded to the west and north by roads, and to a lesser extent to the east by a substantial woodland belt.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of the site would result in Significant harm to the Green Belt in this location, the result of a reduction in openness which could not be readily ameliorated. This effect would be amplified by topography of the site and the extent of existing urbanisation of land in the vicinity currently washed over by Green Belt.



GB9, Site 56, Green Belt Parcel SE11

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Description (land use, degree of openness, boundary quality)</p> <p>Developed site (single storey building and car park) with some managed grassland.</p>	<p>Visual Openness</p> <p>Medium</p> <p>Site enclosed by boundary vegetation to the north and east.</p>	<p>Physical Openness</p> <p>Low</p> <p>Built form covers half the site.</p>	<p>Boundary Quality</p> <p>Mixed</p> <p>Substantial woodland boundaries to the north and east.</p>
	<p>Green Belt Purpose</p>		<p>Contribution to Green Belt Purposes / Explanation</p> <p>Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u>, with accompanying narrative</p>
<p>To check the unrestricted sprawl of large built-up areas</p>		<p>CONTRIBUTION</p> <p>The site is physically detached from the large built up area to the north and east but development would</p>	



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	contribute to localised sprawl (notwithstanding the already developed nature of the site), should it be removed from the Green Belt.
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	CONTRIBUTION The site is part of maintains separation between Selson (Forestdale) and New Addington, although the size and development character of the site reduces this role.
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	LIMITED CONTRIBUTION The site, reflecting its developed character and enclosure, is not directly part of open countryside.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	NO CONTRIBUTION The site makes no contribution to the setting and character of a settlement.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	CONTRIBUTION The site makes a Contribution to the Green Belt as part of wider land which prevents sprawl and maintains separation. The size and enclosure of the site lessens the role.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	The developed character of the site means that there is likely to be Moderate to Limited harm to the Green Belt, but it is unbounded raising issues of permanence.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Development is likely to further reduce openness of the land.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt of which this site is a part would continue to prevent sprawl, encroachment and maintain separation.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Whilst the site is visually contained by a dense woodland belt which provides enclosure this is not a substantive boundary.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development is likely to result in Moderate to Limited harm to the Green Belt, reflecting the previously developed nature of the land and its scale, countered by the absence of clear boundaries to contain the development over the longer term.



GB10, Sites 760, 762, Green Belt Parcel SE11

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Golf course (762) and managed grassland (760) on rising land North – South over 50m</p>	<p>Visual Openness</p>	<p>Physical Openness</p>	<p>Boundary Quality</p>
	<p>High</p> <p>Some tree belts associated with the golf course, other exposed visually.</p>	<p>High</p> <p>There appears to be no built development.</p>	<p>High – Mixed</p> <p>Woodland belts define southwestern boundaries of 760 and 762; hedgerows to the north of 762; otherwise between large built-up areas.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel contains the built edge of New Addington and Forestdale.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel maintains separation between Selson (Forestdale) and New Addington.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel is of an open countryside character which is vulnerable to encroachment.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>CONTRIBUTION The parcel forms part of the southwesterly context of the Addington village Conservation Area, although this is disrupted by A2022 and the transport interchange.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel makes a Significant Contribution to Green Belt purposes through role in preventing sprawl and encroachment and maintaining separation, as well as acting as part of the context for Addington Village.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of these sites would result in Significant harm to the Green Belt, removing open land which makes a Significant Contribution to containing sprawl, encroachment into open countryside and maintaining separation between Selsdon and New Addington.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The impacts of development could not be ameliorated.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the north and south would become compromised in its function. To the north, the Green Belt would be severed from the wider Green Belt to the south. Green Belt to the south would become reduced in width and thereby not perform its current separation role to the same extent.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Varying woodland/hedge boundaries exist which could be strengthened but none are substantive.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development would result in Significant harm to the Green Belt, removing open land which makes a Significant Contribution to containing sprawl, encroachment into open countryside and maintaining separation between Selsdon and New Addington. The external boundaries to the sites are not substantial to ensure long term containment.



GB11, Site 763, Parcel SE12

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness (visual and physical), boundary quality)</p> <p>Golf course (Addington Court Golf Centre (South)) and dense woodland. Rising landform northeast to southwest.</p>	<p>Visual Openness</p> <p>High – Mixed</p> <p>Generally high, in particular towards the north on exposed flank. Vegetation blocks views across, particularly to the south.</p>	<p>Physical Openness</p> <p>High</p> <p>Limited built development within</p>	<p>Boundary Quality</p> <p>High - Mixed</p> <p>Bordered by Featherbed Lane and the built edge of Forestdale. Woodland edge to the south, a boundary shared with Tandridge District.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
To check the unrestricted sprawl of large built-up areas <i>What is the role of the parcel in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	SIGNIFICANT CONTRIBUTION The parcel contains the built edge of Forestdale.
To prevent neighbouring towns from merging into one another <i>What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	SIGNIFICANT CONTRIBUTION The parcel maintains separation between Selson (Forestdale) and New Addington.
To assist in safeguarding the countryside from encroachment <i>What is the role of the parcel in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	SIGNIFICANT CONTRIBUTION The parcel is of an open countryside character which is vulnerable to encroachment. The land is part of open countryside extending south into Tandridge District.
To preserve the setting and special character of historic towns <i>What is the role of the parcel in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	NO CONTRIBUTION The parcel performs no role in this respect.
To assist in urban regeneration by encouraging the recycling of derelict and other urban land	NO CONTRIBUTION There is no derelict land in the vicinity.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the parcel to the Green Belt?</i>	SIGNIFICANT CONTRIBUTION The parcel makes a Significant Contribution to Green Belt purposes through role in preventing sprawl and encroachment and maintaining separation.



Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development would result in significant harm to the Green Belt, reflecting the role of the land in preventing sprawl, encroachment and maintaining separation. The openness of the land would be entirely compromised.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The site is well bounded on all sides and has a mature internal landscape structure which could form the basis for accommodating development.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the south, which is part of open countryside within Tandridge District, would continue to function, preventing sprawl and encroachment. Green Belt to the east and north across Featherbed Lane would be significantly compromised, being left as a relatively narrow strip of land with reduced strategic function.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	The site is clearly bounded on all sides, the weakest being the boundary with Frylands Wood to the south, marked by a woodland edge/PRoW. It is assumed that development, including amenity land, would cover the entire site.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development would result in Significant harm to the Green Belt, removing open land which functions to contain sprawl associated with the outer suburbs of Croydon at Selsdon/Forestdale, and maintain separation between these suburbs and New Addington. The existing landscape structure could assist amelioration.



GB12, Site 755, Green Belt Parcel SE13

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Recycling centre with various low-rise industrial buildings.</p>	<p>Visual Openness</p> <p>Low - Mixed</p> <p>Generally enclosed site, visible from northeast slopes across Featherbed Lane.</p>	<p>Physical Openness</p> <p>Mixed – Low</p> <p>Various industrial buildings across the site.</p>	<p>Boundary Quality</p> <p>Mixed</p> <p>Featherbed Lane is the only substantive boundary, otherwise woodland edges to southeast and southwest and hedgerow to northwest.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation
	Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas</p> <p><i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>CONTRIBUTION</p> <p>The site is not adjacent to a large built up area but the Green Belt acts in concert with the wider Green Belt to contain the built edge of New Addington.</p>
<p>To prevent neighbouring towns from merging into one another</p> <p><i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>The site makes no direct contribution in this respect but is part of wider land which does perform this role.</p>
<p>To assist in safeguarding the countryside from encroachment</p> <p><i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>SIGNIFICANT CONTRIBUTION</p> <p>The site, whilst containing development, is part of open countryside extending south into Tandridge District.</p>
<p>To preserve the setting and special character of historic towns</p> <p><i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>NO CONTRIBUTION</p> <p>The parcel performs no role in this respect.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes</p> <p><i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION</p> <p>Whilst the site is of a semi-developed character, it is nevertheless part of the open countryside which acts in combination with Green Belt in Tandridge District preventing encroachment.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development would result in Moderate to Significant harm to the Green Belt, reflecting the intrusion of development into open countryside, notwithstanding the previously developed character of the site.




Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The generally visually enclosed character of the site would ameliorate impacts associated with visual intrusion.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt would continue to prevent sprawl, encroachment and maintain separation.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Boundaries of the site, apart from Feartherbed Lane, are not well defined.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	The impact of development on this site is judged to result in Moderate to Significant harm to the Green Belt, reflecting the intrusion of built form into open countryside. Whilst the site is currently partially developed, intensification of built form would constitute intrusion open countryside from a site which is largely unbounded.



GB13, Site 535, Green Belt Parcel SE16

Table 1: Site Assessment Proforma

Location Map and Aerial			
 <p>The figure consists of two side-by-side maps. The left map is an aerial photograph with a red boundary line outlining the site area, labeled SE10, SE16, and SE11. It includes coordinate markers at the top (-2000, -1000, 0) and on the left (6681000, 6680000, 6679000). The right map is a vector-style map of the same area, with a red boundary line for the site and a blue line for a road. It includes coordinate markers at the top (538000, 539000) and on the left (6681000, 6680000, 6679000). An inset map in the top right of the right map shows a larger area with parcels 757, 535, 758, and 832, with SE16 highlighted in yellow.</p>			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Managed amenity grassland, previously a pitch and putt course. Slopes northeastwards to a river valley.</p>	<p>Visual Openness</p>	<p>Physical Openness</p>	<p>Boundary Quality</p>
	<p>High</p> <p>The site is on a prominent slope.</p>	<p>High</p> <p>No built development within.</p>	<p>Mixed</p> <p>The site is bounded on three sides, by King Henry's Drive, Kestrel Way and Goldcrest Way, unbounded to the north.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>CONTRIBUTION The Green Belt maintains the existing built edge of New Addington.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>NO CONTRIBUTION The land makes no contribution in this respect.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>CONTRIBUTION The land maintains open land to the northeast of New Addington.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>NO CONTRIBUTION The land makes no contribution in this respect.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>CONTRIBUTION The site, whilst of modest size, contributes to maintaining the openness of land in this locality.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development is judged to result in Moderate harm to Green Belt, reflecting the removal of openness from a visually prominent site, lessened by the physical containment of the site.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Through the introduction of landscaping.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The Green Belt to the north and east would continue to prevent sprawl and encroachment into open countryside.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Clear boundaries exist to the east, south and west, undefined to the north.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	The degree of harm to the Green Belt resulting from development is judged to be Moderate , reflecting a combination of the open but largely bounded character of the site. The visual prominence of the site is an issue which would require particular attention.



GB14 Site 661, Green Belt Parcel SE1

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Council depot.</p>	<p>Visual Openness</p> <p>Low</p> <p>Enclosed site with limited views in and across. Glimpsed views from Conduit Lane.</p>	<p>Physical Openness</p> <p>Mixed - Low</p> <p>Low rise storage buildings, otherwise open.</p>	<p>Boundary Quality</p> <p>High – Mixed</p> <p>Bounded by Conduit Lane to the southeast, hedgerow to the west, property boundary to the north.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas</p> <p><i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>NO CONTRIBUTION</p> <p>The site is not connected to a large built-up area.</p>
<p>To prevent neighbouring towns from merging into one another</p> <p><i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>NO CONTRIBUTION</p> <p>The site makes no contribution in this respect.</p>
<p>To assist in safeguarding the countryside from encroachment</p> <p><i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>CONTRIBUTION</p> <p>The site is part of a wider land which retains a degree of open countryside character, albeit with various instances of built development within.</p>
<p>To preserve the setting and special character of historic towns</p> <p><i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>NO CONTRIBUTION</p> <p>The site makes no contribution in this respect.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes</p> <p><i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>CONTRIBUTION</p> <p>The site is part of wider open countryside (albeit intruded with various forms of built development) and as such makes a Contribution to the maintenance of openness.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of the site would result in Moderate to Limited harm to the Green Belt, reflecting its part previously developed character and degree of enclosure. There would nevertheless be a loss of openness of land which is detached from a built edge.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Loss of openness could not be ameliorated.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt, of which the site is a part, would continue to function to maintain openness, albeit in the context of existing built development.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	The site is bounded by Conduit Lane to the east, with a less substantial wooded hedgerow to the west.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of the site is judged to result in Moderate to Limited harm to the Green Belt, reflecting its previously developed and visually enclosed character, moderated by the loss of openness of an isolated site and the absence of a clear western boundary.



GB15, Sites 651, 653, 654, 655, 657, 658, Green Belt Parcel SE6

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Arable and managed grassland</p>	<p>Visual Openness</p>	<p>Physical Openness</p>	<p>Boundary Quality</p>
	<p>Mixed - High</p> <p>Exposed to the A212; more enclosed to the north, but views over from Bramley Bank.</p>	<p>High</p> <p>No built development within.</p>	<p>High – Mixed</p> <p>Bordered by property boundaries, the A212 and residential/woodland edge which are insubstantial boundaries to the west adjoining Bramley Bank and Heathfield.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas</p> <p><i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>SIGNIFICANT CONTRIBUTION</p> <p>The further sprawl of development along the A212 is kept in check, particularly in combination with land to the northwest.</p>
<p>To prevent neighbouring towns from merging into one another</p> <p><i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>CONTRIBUTION</p> <p>The land in combination with land to the northwest helps to prevent the merger of South Croydon and Addington.</p>
<p>To assist in safeguarding the countryside from encroachment</p> <p><i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>CONTRIBUTION</p> <p>The parcel retains an open countryside character because of its scale and land uses. However, it is isolated from wider open countryside meaning that the role is localised.</p>
<p>To preserve the setting and special character of historic towns</p> <p><i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>NO CONTRIBUTION</p> <p>The parcel plays no clear role in this respect.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes</p> <p><i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION</p> <p>The parcel prevents the further sprawl of development along the A212 and helps to maintain a degree of openness and countryside character.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of all parcels would result in Moderate to Significant harm to the Green Belt reflecting the role of the Green Belt in preventing sprawl and also protecting countryside character which remains across the parcel.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Significant landscaping would be required to help accommodate development, resulting along with the loss of openness) in a change to the character of the land.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the west would largely lose its role, being residential and woodland adjacent to built development off Ballards Way.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Development would require the creation of western boundary which currently does not exist. Permanence is thus an issue.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of this suite of sites as a whole would result in Moderate to Significant harm to the Green Belt, arising from the removal of openness from exposed land which prevents sprawl and encroachment. The extent of removal of land associated with the sites, boundary issues to the west, limited opportunity for mitigation and the creation of 'remnant' Green Belt add up to the judged degree of harm.



GB16, Existing Development off Shirley Hills Road, Pine Combe, Bishops Walk, Gravel Hill, Green Belt Parcel SE7

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Residential properties.</p>	<p>Visual Openness</p> <p>Low - Mixed</p> <p>No clear views across - interrupted views associated with property boundaries.</p>	<p>Physical Openness</p> <p>Low – Mixed</p> <p>Predominantly residential properties of varying density.</p>	<p>Boundary Quality</p> <p>Mixed</p> <p>Comprising, variously, roads and property boundaries.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	Development has resulted in localised sprawl. Whilst it is unclear whether this is pre- or post-Green Belt designation, the washed over status of the land prevents intensification of sprawl. The land makes a Significant Contribution in this respect.
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	Whilst Upper Shirley and Selsdon (Forestdale) are technically merged through development along Shirley Hills Road/Gravel Hill, the Green Belt makes a Contribution to the reinforcement of this merger.
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	The land, whilst of a developed character, contributes to openness of the wider countryside by virtue of the open character of low density properties.
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	The land makes No Contribution in this respect.
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	Whilst the land is developed for residential and leisure development, its low density means that the Green Belt prevents intensification of sprawl and continued separation adjacent built up areas. As such overall the land makes a Significant Contribution to the Green Belt.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Further development through intensification is judged to result in Moderate to Significant harm to the Green Belt, reflecting the role of the land in preventing further sprawl and maintaining separation.


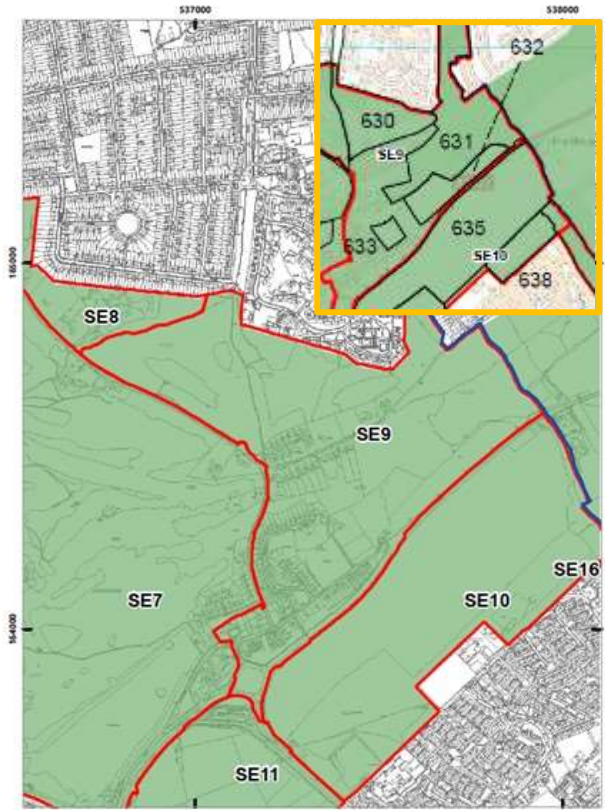


Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The effects on the Green Belt could not be ameliorated as development would entail removal of structural landscaping.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The Green Belt to the east west and south would continue to prevent sprawl, merger and encroachment.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Property boundaries define the development footprint, but these are not substantive boundaries.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development through intensification of this low to medium density residential land would result in Moderate to Significant harm to the Green Belt, reflecting the role of this land in preventing further sprawl and separation of large built areas. De-designation would result in severance of the Green Belt with attendant effects on openness.



GB17, Site 632, Green Belt Parcel SE9

Table 1: Site Assessment Proforma

Location Map and Aerial			
 <p>© Getmapping plc.</p>		 <p>© Crown Copyright, All rights reserved. Licence number AL100001776.</p>	
<p>Site Description (land use, condition, degree of openness, boundary quality).</p> <p>Managed pasture.</p>	<p>Visual Openness</p> <p>Mixed</p> <p>The site is largely enclosed by dense woodland, glimpsed views from the A2022.</p>	<p>Physical Openness</p> <p>High</p> <p>No built development apparent.</p>	<p>Boundary Quality</p> <p>Mixed</p> <p>Bounded by the A2022 to the southeast, otherwise undefined woodland boundaries.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel contains the built edge of Shirley at Spring Park.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel maintains openness between Shirley and New Addington.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel is generally of an open countryside character and related to wider open countryside within Bromley Borough.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel forms the easterly context for the Addington village Conservation Area.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel makes a Significant Contribution to Green Belt purposes through role in preventing further sprawl and encroachment as well as acting as the context for Addington Village.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development is judged to result in Significant harm to the Green Belt, reflecting its detached location and the creation of localised sprawl along the A2022.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Whilst the site is enclosed, the effect on openness could not be ameliorated.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt would continue to prevent sprawl, merger, encroachment and context for Addington, although these would be compromised.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Clear along the A2022, otherwise poorly bounded.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development would result in Significant harm to the Green Belt, notwithstanding the sites relatively small scale. However, the its detached location and unbounded character would create localised sprawl and encroachment which could not be ameliorated.



GB18, Sites 905, 676, 677, Green Belt Parcel SW1

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>open grassland with woodland edges to the west. Level landform.</p>	<p>Visual Openness</p> <p>Mixed Views across from Meadow Hill but interrupted by woodland belts.</p>	<p>Physical Openness</p> <p>High No significant development within.</p>	<p>Boundary Quality</p> <p>High - Mixed Bordered by dense hedgerow planting to the west; property boundaries to the south and east; Meadow Hill to the north. The western and northern boundaries are shared with Sutton Borough.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>SIGNIFICANT CONTRIBUTION</p> <p>The parcel is part of the wider Green Belt at Woodcote within the London Borough of Sutton and cannot clearly be separated from it. As part of this wider land, northwestward sprawl suburban development at Purley is contained.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>CONTRIBUTION</p> <p>Strategically, the parcel is part of land between Coulsdon and Sutton. The parcel, in combination with land within Sutton Borough, performs a local separation role in respect of maintaining a degree of separation between Woodcote and Clock House.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>SIGNIFICANT CONTRIBUTION</p> <p>In combination with land to the west within Sutton Borough and Reigate & Banstead District, the parcel prevents incremental encroachment of development into open countryside (albeit modified by golf course use).</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>There are no Conservation Areas in the immediate vicinity.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION</p> <p>The parcel is part of wider Green Belt land within Sutton Borough which together act to prevent the westward sprawl of Purley into open countryside, as well as preventing incremental change in an area with no substantive boundaries to contain development.</p>



Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development is judged to result in Moderate to Significant harm to the Green Belt reflecting the role of the land in containing sprawl and preventing incremental encroachment.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Structural planting would contain development to some degree.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the north and west (within Sutton Borough) would continue to prevent encroachment and sprawl, although this role would be diminished. Green Belt to the east would become redundant.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Through Meadow Hill and a boundary hedge.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development would result in Moderate to Significant harm to the Green Belt as a result of the extension of the urban edge into open land, compromising the wider Green Belt function of containment. Green Belt to the east would be isolated and therefore redundant.



GB19a, Sites 694, 695, 697, 698, 916, Green Belt Parcel SW13

Table 1: Site Assessment Proforma

Location Map and Aerial			
Site Description (land use, condition, degree of openness, boundary quality) Grazing paddocks off Golf Road.	Visual Openness	Physical Openness	Boundary Quality
	Mixed Mature hedgerows interrupt views across.	Mixed Sites are intermixed with residential properties.	Mixed Of varying strength.



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	SIGNIFICANT CONTRIBUTION The land contains Kenley (Purley) to the west and east.
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	SIGNIFICANT CONTRIBUTION The land is part of the remaining gap between Kenley (Purley) and Whyteleafe (Caterham).
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	SIGNIFICANT CONTRIBUTION The parcel is vulnerable to incremental change through erosion of its edges.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	SIGNIFICANT CONTRIBUTION Kenley Aerodrome, immediately to the south, is a Conservation Area.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	SIGNIFICANT CONTRIBUTION The land forms part of the remaining gap between Purley, Caterham and Warlingham, containing these settlements and protecting open countryside from encroachment.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of the sites in combination is judged to result in Moderate to Significant harm to the Green Belt, reflecting the degree of enclosure of the sites in relation to surrounding residential properties.




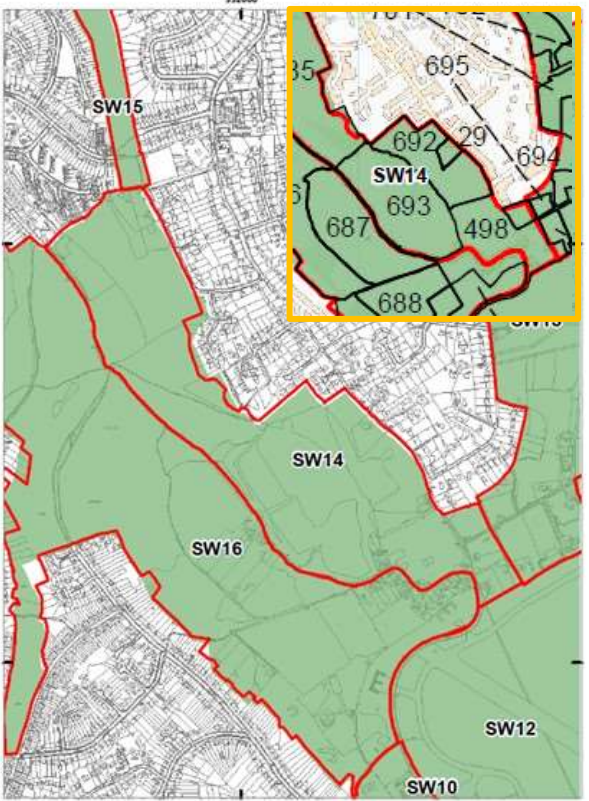
Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The effects of development could not be ameliorated.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The wider Green Belt to the west, south and east would continue to contain sprawl and prevent encroachment, although development would begin to compromise this function through incremental change.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Boundaries could be formed by external property boundaries but their removal from the Green Belt would be required which would be incongruous with similarly low density properties within this parcel and in the Green Belt to the west.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of these parcels as a whole will result in Moderate to Significant harm to the Green Belt, constituting an extension of the large built-up area southwards, in addition requiring the removal of low density properties from the Green Belt.





GB19b Site 693, Green Belt Parcel SW14

Table 1: Site Assessment Proforma

Location Map and Aerial			
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<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Woodland, pasture – informal open space known as Betts Mead. Level landform.</p>	<p>Visual Openness</p>	<p>Physical Openness</p>	<p>Boundary Quality</p>
	<p>Mixed - High</p> <p>Views across, occasional medium distance, but interrupted by strong tree belts and clumps.</p>	<p>High</p> <p>No development within.</p>	<p>Mixed</p> <p>Bordered by a road and woodland edges.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>SIGNIFICANT CONTRIBUTION Whilst largely enclosed by suburban development, the parcel is of a scale and character such that it protects open land from unbounded development to the north and east associated with the suburb of Kenley.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>SIGNIFICANT CONTRIBUTION The land, in combination with land to the west, separates Coulsdon/Old Coulsdon and Kenley.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>SIGNIFICANT CONTRIBUTION Notwithstanding the parcel's location and its size, it nevertheless retains a strongly open character and connectivity to wider open land to the south and west.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>CONTRIBUTION The parcel forms part of the setting for Kenley Aerodrome Conservation Area immediately to the south.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel is an important part of remaining open land in this locality, containing adjacent suburban development and connected to wider open land to the south and west. The land is part of the wedge between Coulsdon/Old Coulsdon and Kenley and overall makes a Significant Contribution to Green Belt purposes.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development would result in Significant harm to the Green Belt in this location, removing a substantial site at the heart of a wider parcel which makes a


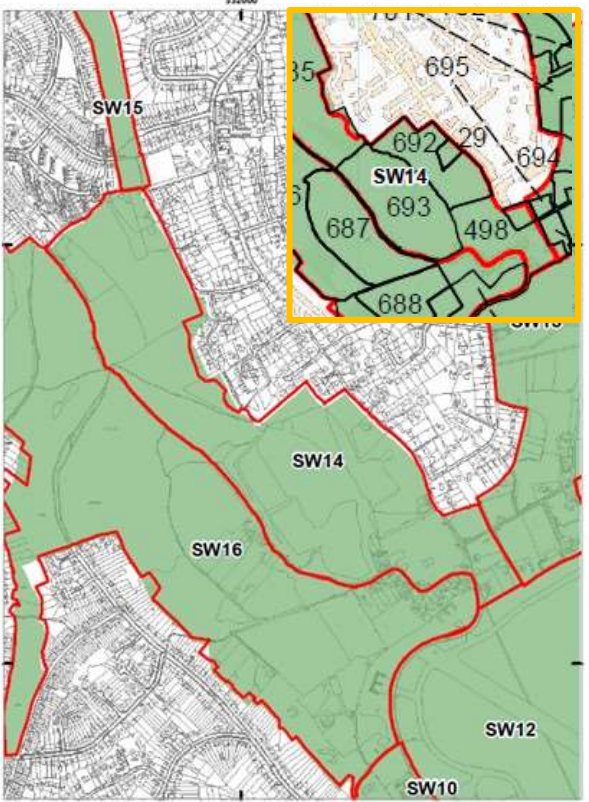


Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
	Significant Contribution in respect of preventing sprawl, encroachment and maintaining separation.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The impacts of development could not be ameliorated.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the north, east, south and west would be diminished in its function because of the intrusion of a large, disconnected development.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Old Lodge Lane forms a permanent boundary to the west and south; boundaries to the north and east are insubstantial.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development is judged to result in Significant harm to the Green Belt, resulting from the intrusion of a large site into Green Belt which prevents sprawl, encroachment and maintains separation.



GB19c Site 498, Green Belt Parcel SW14

Table 1: Site Assessment Proforma

Location Map and Aerial			
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<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Woodland; two detached properties.</p>	<p>Visual Openness</p> <p>Low</p> <p>Dense woodland.</p>	<p>Physical Openness</p> <p>High</p> <p>No significant development within.</p>	<p>Boundary Quality</p> <p>High</p> <p>Bordered by roads and property boundaries.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>SIGNIFICANT CONTRIBUTION Whilst largely enclosed by suburban development, the parcel is of a scale and character such that it protects open land from unbounded development to the north and east associated with the suburb of Kenley.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>SIGNIFICANT CONTRIBUTION The land, in combination with land to the west, separates Coulsdon/Old Coulsdon and Kenley.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>SIGNIFICANT CONTRIBUTION Notwithstanding the parcel's location and its size, it nevertheless retains a strongly open character and connectivity to wider open land to the south and west.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>CONTRIBUTION The parcel forms part of the setting for Kenley Aerodrome Conservation Area immediately to the south.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION The parcel is an important part of remaining open land in this locality, containing adjacent suburban development and connected to wider open land to the south and west. The land is part of the wedge between Coulsdon/Old Coulsdon and Kenley and overall makes a Significant Contribution to Green Belt purposes.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development would result in Significant harm to the Green Belt in this location, removing a site at the heart of a wider parcel which makes a Significant


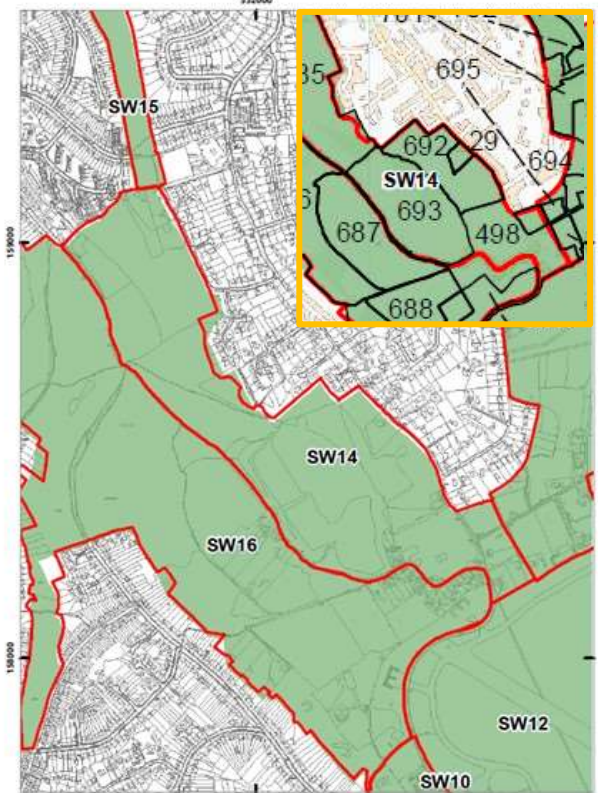


Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
	Contribution in respect of preventing sprawl, encroachment and maintaining separation.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The impacts of development could not be ameliorated.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the north, east, south and west would be diminished in its function because of the intrusion of a large, disconnected development.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Old Lodge Lane forms a permanent boundary to the west and south; boundaries to the north and east are insubstantial.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development is judged to result in Significant harm to the Green Belt, resulting from the intrusion of a large site into Green Belt which prevents sprawl, encroachment and maintains separation.



GB19d, Site 29, Green Belt Parcel SW14

Table 1: Site Assessment Proforma

Location Map and Aerial			
			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Large detached residential property and curtilage off Hayes Lane.</p>	<p>Visual Openness</p> <p>Low</p> <p>Enclosed by dense boundary vegetation – no views in.</p>	<p>Physical Openness</p> <p>Mixed</p> <p>Detached residence within.</p>	<p>Boundary Quality</p> <p>High</p> <p>Property boundaries.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>CONTRIBUTION</p> <p>The site is part of a larger parcel which prevents sprawl from adjacent large built-up areas and contributes to this role.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>The site makes only a Limited Contribution to preventing merger as part of the wider parent parcel.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>LIMITED CONTRIBUTION</p> <p>The site, reflecting its enclosed and partly developed character, makes only a limited contribution to this purpose.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>NO CONTRIBUTION</p> <p>The site makes no contribution to this role.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>CONTRIBUTION</p> <p>The site makes a Contribution to the Green Belt by virtue of its location within a wider parcel which makes a significant contribution to preventing sprawl, encroachment and merger. The site's relatively small and enclosed character means the contribution is modest but nevertheless present, physically and in principle.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of the site through intensification is judged to result in Moderate to Limited harm to the Green Belt. This reflects the developed nature of the


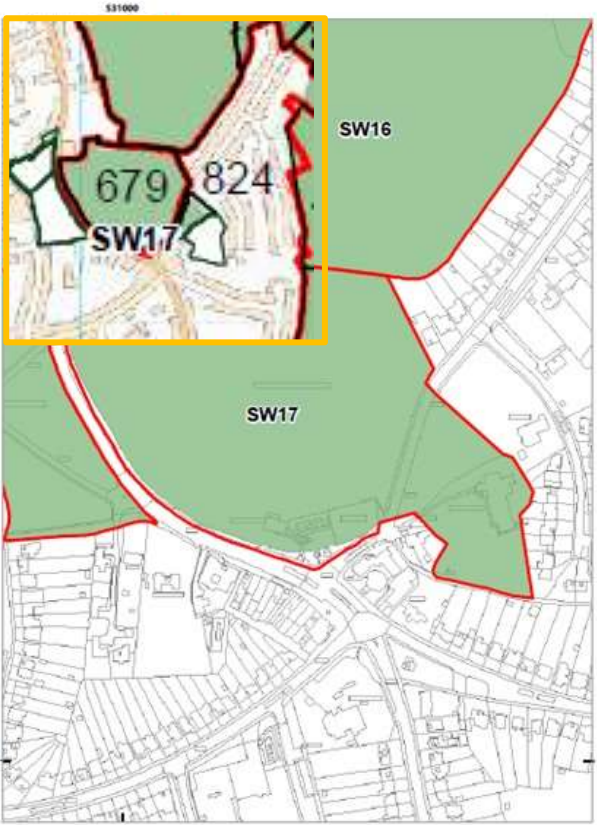


Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
	site but the intrusion by additional development which will damage the physical openness of the Green Belt.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Dense boundary planting visually encloses the site.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The surrounding Green Belt to the north, west and south would continue to perform strategic roles in respect of sprawl, encroachment and separation.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Definition of the site through property boundaries, although these are not significant features.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of the site through presumed intensification of development would result in Moderate to Limited harm to the Green Belt, reflecting physical intrusion and effect on openness. Whilst the site is visually enclosed, there would still be damage to the openness of the Green Belt meaning that development through Very Special Circumstances is more appropriate than release.



GB20, Site 824, Green Belt Parcel SW17

Table 1: Site Assessment Proforma

Location Map and Aerial			
			
Site Description (land use, condition, degree of openness, boundary quality) Amenity grassland.	Visual Openness	Physical Openness	Boundary Quality
	High Views across from Canons Hill.	High No development within.	High Canons Hill and St John's Church.
Green Belt Purpose		Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative	
To check the unrestricted sprawl of large built-up areas		NO CONTRIBUTION The site does not contain sprawl.	



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i>	
To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i>	NO CONTRIBUTION The site does not contribute to preventing merger.
To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i>	NO CONTRIBUTION The site is not part of, nor adjacent to, open countryside.
To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i>	SIGNIFICANT CONTRIBUTION The site is part of the Old Coulsdon Conservation Area.
Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i>	SIGNIFICANT CONTRIBUTION The site is locally significant through its role as part of the Old Coulsdon Conservation Area, therefore making a Significant Contribution. The land could be protected through the use of other designations.

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of this site is judged to cause Significant harm, reflecting the role of the site in protecting openness associated with Old Coulsdon Conservation Area. This is a locally significant role.


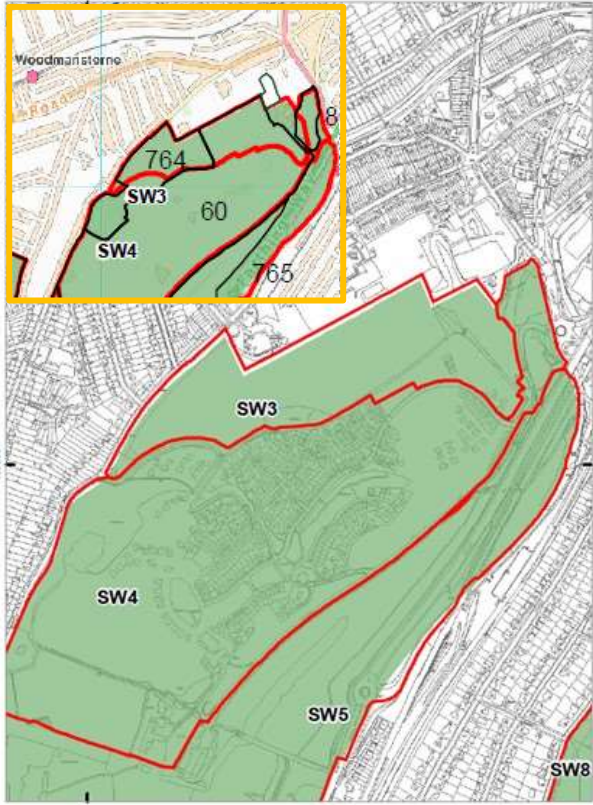


Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The effects of development could not be ameliorated.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	The Green Belt associated with Grange Park will continue to perform its Green Belt role.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Bounded by Canons Hill and St John's Church.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Loss of physical and visual openness would lead to Significant harm to the Green Belt in this location which could not be mitigated.



GB21, Site 764, Green Belt Parcel SW3

Table 1: Site Assessment Proforma

Location Map and Aerial			
 <p>© Getmapping plc.</p>		 <p>© Crown Copyright. All rights reserved. Licence number AL100001776.</p>	
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Grassland; no public access; steep slope forming a southerly backdrop to Coulsdon. A small part of the northeastern edge of the parcel is MOL. Steeply rising landform northwest to southeast.</p>	<p>Visual Openness</p> <p>High - Mixed</p> <p>Views across from Cane Hill development. Well-treed boundaries.</p>	<p>Physical Openness</p> <p>High</p> <p>No significant development within.</p>	<p>Boundary Quality</p> <p>High</p> <p>Bordered by dense hedgerow planting, development at Cane Hill and school to the north.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>LIMITED CONTRIBUTION The size of the parcel and its clear boundaries mean that any containment of sprawl is localised.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>LIMITED CONTRIBUTION The parcel performs a local separation role in respect of the new development at Cane Hill and Coulsdon.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>LIMITED CONTRIBUTION The land is not connected to the wider open countryside, but nevertheless retains a degree of countryside character within a densely built-up area.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>LIMITED CONTRIBUTION There are no Conservation Areas in the vicinity.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>LIMITED CONTRIBUTION The land is of a size and location which limits its Green Belt role, emphasised by the redevelopment of land at Cane Hill which encloses the parcel. Nevertheless, there remains a quality of visual and physical openness which means the land retains a limited Green Belt role.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development would result in Moderate harm to the Green Belt reflecting the site's size and detached character.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Whilst internal and boundary planting would soften visual impacts, the site is visually exposed.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the northeast would become further isolated and lose all function.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Property boundaries form the northwestern and southern boundaries; a northeastern boundary would need to be established.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development is judged to result in Moderate harm to the Green Belt, reflecting the size and isolated character of the site which is offset by its relatively high degree of exposure. Development would require the de-designation of adjacent Green Belt.



GB22, Sites 767, 768, 769, 914, Green Belt Parcel SW5

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Pasture and dense woodland. Rising landform southeast to northwest.</p>	<p>Visual Openness</p> <p>Mixed - Low</p> <p>Generally views restricted by dense vegetation. Clear view in from Farthing Down to the east.</p>	<p>Physical Openness</p> <p>High - Mixed</p> <p>Development limited to Portnalls House.</p>	<p>Boundary Quality</p> <p>High</p> <p>Bordered by Portnalls Road, Hollymeok Road, the A23 and development at Cane Hill.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>CONTRIBUTION Although enclosed by clear boundaries, further sprawl of the built-up area of Coulsdon (recently substantiated by the development at Cane Hill) is contained.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>CONTRIBUTION The parcel separates Coulsdon from Chipstead, although this is a local role.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>CONTRIBUTION The land retains a quality of countryside by virtue of its land use and size. It is separated from the wider open countryside, however, by built development on all sides.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>LIMITED CONTRIBUTION There are no Conservation Areas in the vicinity.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>CONTRIBUTION The land is of a substantial scale which retains the quality of open countryside despite being isolated by built development. Despite being visually enclosed from surrounding roads, with no public access, there are clear views into the parcel from Farthing Down which confirm its open character. Consequently, the Green Belt serves to prevent localised sprawl and encroachment.</p>



Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of these sites as a whole would result in Moderate to Significant harm to the Green Belt reflecting the size of the sites and the effect of development on physical and visual openness in this location.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	A landscape structure already exists which could be strengthened.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the north would lose its function.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Southern boundaries are defined by roads; otherwise undefined.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of these sites would cause Moderate to Significant harm to the Green Belt in this location, compromising visual and physical openness, and constituting localised sprawl and encroachment. Remaining Green Belt to the north would become isolated and lose its function.



GB23, Site 772, Green Belt Parcel SW7

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Grazing land on a west-facing slope.</p>	<p>Visual Openness</p>	<p>Physical Openness</p>	<p>Boundary Quality</p>
	<p>Mixed - High</p> <p>Expansive views across; exposed to views in from the west.</p>	<p>High</p> <p>No development</p>	<p>Mixed</p> <p>Bordered by a railway line and built development at Hooley Farm. Southern boundary poorly defined; part of open countryside shared with Reigate and Banstead Borough.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>SIGNIFICANT CONTRIBUTION The land contains sprawl southwards from Coulsdon along the A23 corridor. The southern boundary (shared with Reigate & Banstead Borough) is insubstantial, being an intermittent hedgerow.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>LIMITED CONTRIBUTION The parcel performs no clear role in separation.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>CONTRIBUTION The parcel prevents incremental change of the countryside to the south of Coulsdon.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>NO CONTRIBUTION There are no Conservation Areas in the vicinity.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>SIGNIFICANT CONTRIBUTION The land forms part of the southwestern edge of Coulsdon, preventing sprawl and protecting open countryside from encroachment.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development would result in Significant to Moderate harm to the Green Belt, reflecting the extension of the built edge of Coulsdon southwards along the A23 corridor, thereby adding to sprawl and encroachment.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Structural planting would ameliorate visual impacts to some degree but the site's visual exposure would make this difficult to achieve.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the east, south and west would continue to perform its function of containing sprawl and preventing encroachment, although diminished by the erosion of the inner edge.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	The land is clearly bounded to the north, east and west but poorly defined to the south.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of the site would result in Significant to Moderate harm to the Green Belt, reflecting the role of the land in containing the built edge of Coulsdon. Development would add to localised sprawl along the A23 corridor and constitute encroachment into the countryside in this location. Notwithstanding the presence of development to the north and east, development would be difficult to mitigate on this exposed site.



GB24, Sites 24, 826, Green Belt Parcel SW9

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Land in use as grazing/garden curtilage</p>	<p>Visual Openness</p> <p>Mixed</p> <p>Enclosed by dense boundary vegetation; glimpsed views in from Tollers Lane.</p>	<p>Physical Openness</p> <p>Mixed</p> <p>Residential property within,</p>	<p>Boundary Quality</p> <p>High – Mixed</p> <p>Bounded by Tollers Lane to the north, Coulsdon Road to the east, property boundaries to the west and dense woodland to the south.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>CONTRIBUTION Notwithstanding the small scale of the sites and their high degree of visual enclosure, they nevertheless represent the start of open countryside which contains the edge of Coulsdon in this location. As such they make a Contribution to this purpose.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>LIMITED CONTRIBUTION The sites make only an indirect contribution as part of the wider parcel.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>CONTRIBUTION Despite their scale and enclosure, the sites are part of open countryside to the south of Coulsdon.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>NO CONTRIBUTION The sites make no contribution in this respect.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>Notwithstanding the size and degree of visual enclosure of the sites, they nevertheless make a Contribution to the Green Belt through preventing both sprawl and encroachment as part of the wider open countryside in this location.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of the sites would result in Moderate to Limited harm to the Green Belt, reflecting the Contribution of the land to containing sprawl and preventing encroachment.



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The high degree of boundary planting would visually contain development.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the south would continue to perform its strategic functions of containing sprawl and preventing encroachment.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	Whilst the sites are bounded on three sides, the southern boundary comprises a wooded hedge which does not constitute a substantial boundary.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of these sites would result in Moderate to Limited harm to the Green Belt, reflecting the enclosed visual character of the site and the rounding off of settlement form, balanced by the absence of a significant external boundary.



GB25, Site 518, Green Belt Parcel SW9

Table 1: Site Assessment Proforma

Location Map and Aerial			
<p>Site Description (land use, condition, degree of openness, boundary quality)</p> <p>Semi-managed amenity grassland off Goodenough Road/Admirals Walk. Playground to west.</p>	<p>Visual Openness</p> <p>High</p> <p>View across to boundary woodland.</p>	<p>Physical Openness</p> <p>High</p> <p>No built development.</p>	<p>Boundary Quality</p> <p>Mixed</p> <p>Bounded by Goodenough Road/Admirals Walk and property boundaries; dense woodland belt to the south; open northwestern boundary.</p>



Green Belt Purpose	Contribution to Green Belt Purposes / Explanation Grading of: <u>Significant Contribution / Contribution / Limited or No Contribution</u> , with accompanying narrative
<p>To check the unrestricted sprawl of large built-up areas <i>What is the role of the site in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</i></p>	<p>CONTRIBUTION Whilst part of the amenity curtilage of the houses in this location, the land contains the urban edge of Coulsdon.</p>
<p>To prevent neighbouring towns from merging into one another <i>What is the role of the site in preventing the merger of settlements which might occur through a reduction in the distance between them?</i></p>	<p>NO CONTRIBUTION The land makes no contribution in this respect.</p>
<p>To assist in safeguarding the countryside from encroachment <i>What is the role of the site in maintaining a sense of openness, particularly in light of proximity to a settlement edge?</i></p>	<p>CONTRIBUTION Whilst part of the amenity curtilage of the houses in this location, the land forms the transition to open countryside.</p>
<p>To preserve the setting and special character of historic towns <i>What is the role of the site in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?</i></p>	<p>NO CONTRIBUTION The land makes no contribution in this respect.</p>
<p>Overall Assessment of Contribution to Green Belt Purposes <i>In light of the judgements made on individual purposes, what is the overall contribution of the site to the Green Belt?</i></p>	<p>CONTRIBUTION The Green Belt in this location is part of the transition to open countryside to the southwest. While it has the character of amenity grassland associated with adjacent properties, the site nevertheless makes a Contribution to the Green Belt.</p>

Table 2: Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt of removing the site from it?	Development of this land is judged to result in Moderate to Limited harm to the Green Belt, reflecting the character of the site as part of the transition to open countryside which does not have



Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
	significant external boundaries balanced by its visually enclosed character.
To what extent could the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	The site is already enclosed visually. Development would constitute a new built edge.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Green Belt to the southwest would continue in its functions in respect of sprawl, encroachment and separation.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable and likely to be permanent? Does it avoid including land which it is necessary to keep permanently open?	The woodland edge to the southwest would form a new Green Belt boundary, although this is not substantive. There is no clear boundary to the northwest.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Development of this site would result in Moderate to Limited harm to the Green Belt, reflecting the enclosed visual character of the site and the rounding off of settlement form, balanced by the absence of significant external boundaries.





Appendix: Planning Practice Guidance, July 2019

Recently published Planning Practice Guidance¹ introduces a number of changes to the how the impacts of development on the Green Belt should be considered, including the interpretation of openness and opportunities for compensatory improvements to remaining Green Belt land. The introduced text is as follows:

Guidance: Green Belt

Advice on the role of the Green Belt in the planning system.

Published 22 July 2019

From: Ministry of Housing, Communities & Local Government

What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation.*

Paragraph: 001 Reference ID: 64-001-20190722

Revision date: 22 07 2019

How might plans set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements?

Where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may 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*

¹ <https://www.gov.uk/guidance/green-belt>



- *improved access to new, enhanced or existing recreational and playing field provision.*

Paragraph: 002 Reference ID: 64-002-20190722

Revision date: 22 07 2019

How can the strategic policy-making authority ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt will be secured?

Identifying the scope for compensatory improvements is likely to require early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified. Consideration will need to be given to:

- *land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;*
- *the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability;*
- *the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible. Section 106 agreements could be used to secure long-term maintenance of sites.*

Paragraph: 003 Reference ID: 64-003-20190722

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