

Croydon Borough Council

Green Belt and Metropolitan Open Land Study

DRAFT Report





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Report for

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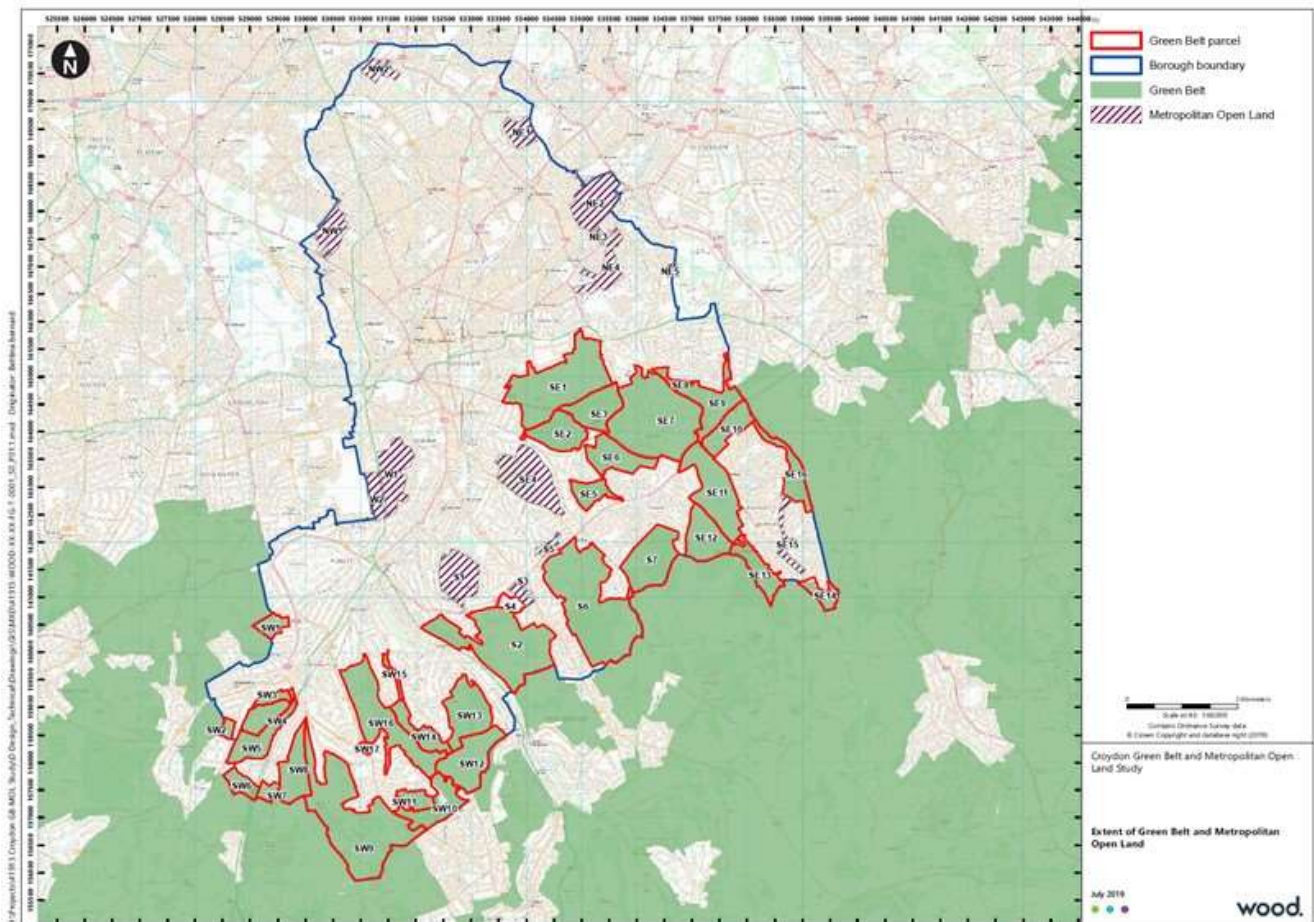


Executive summary

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

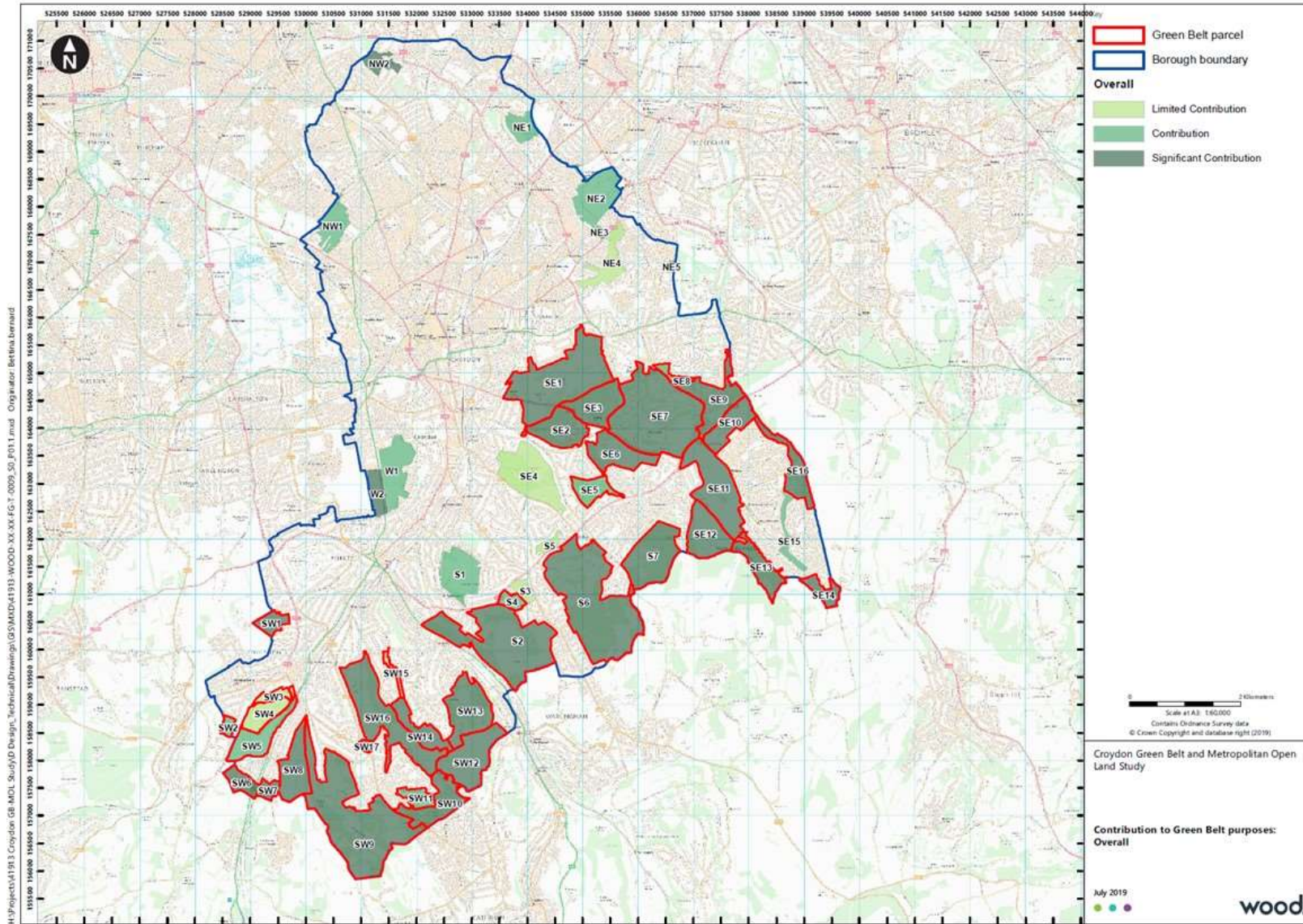
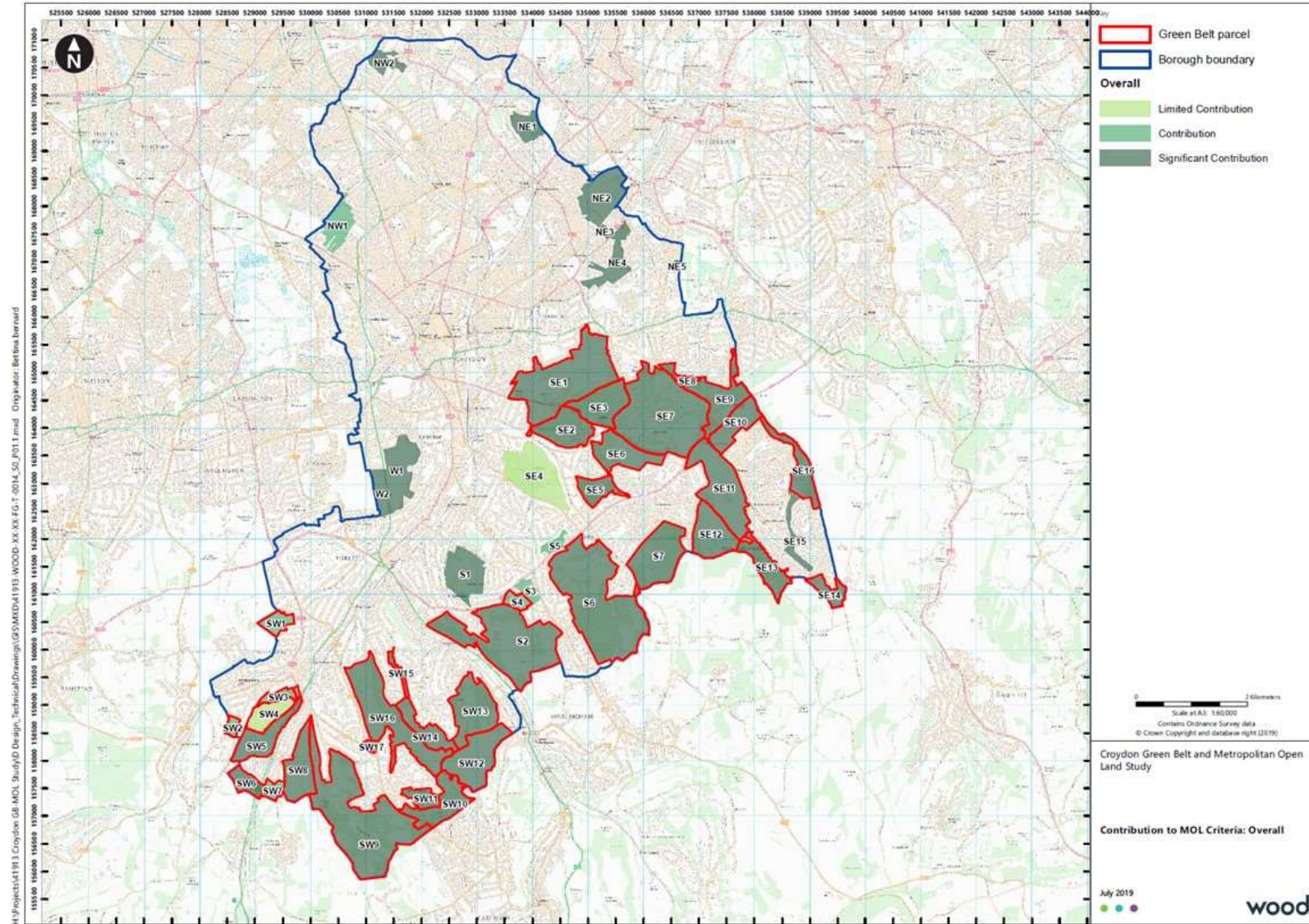


Figure 3 Overall Contribution to Metropolitan Open Land Criteria



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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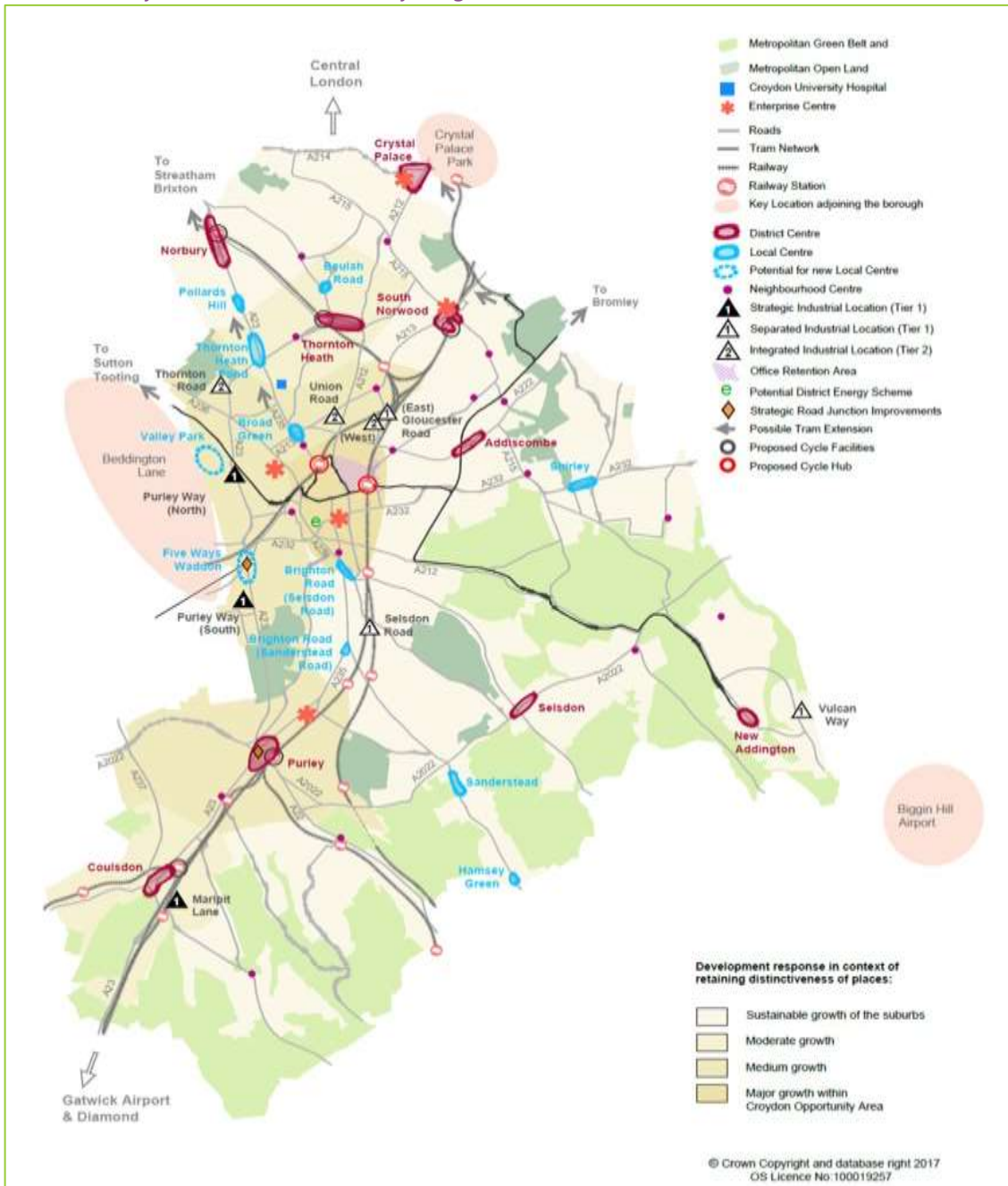
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1. Study Remit and Policy Context

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

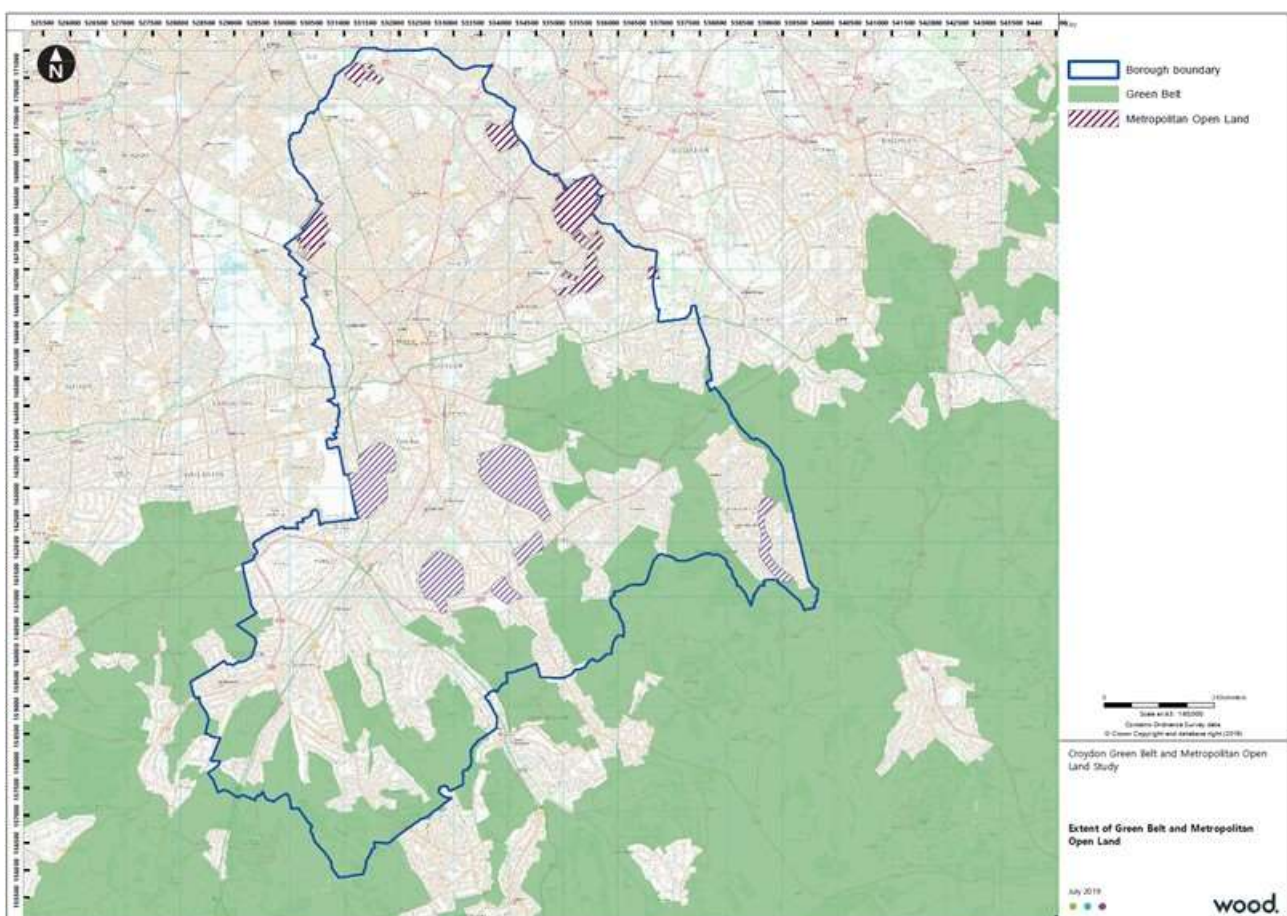
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Green Belt to the east, south and west, and the extent of MOL designated within the Borough.

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)

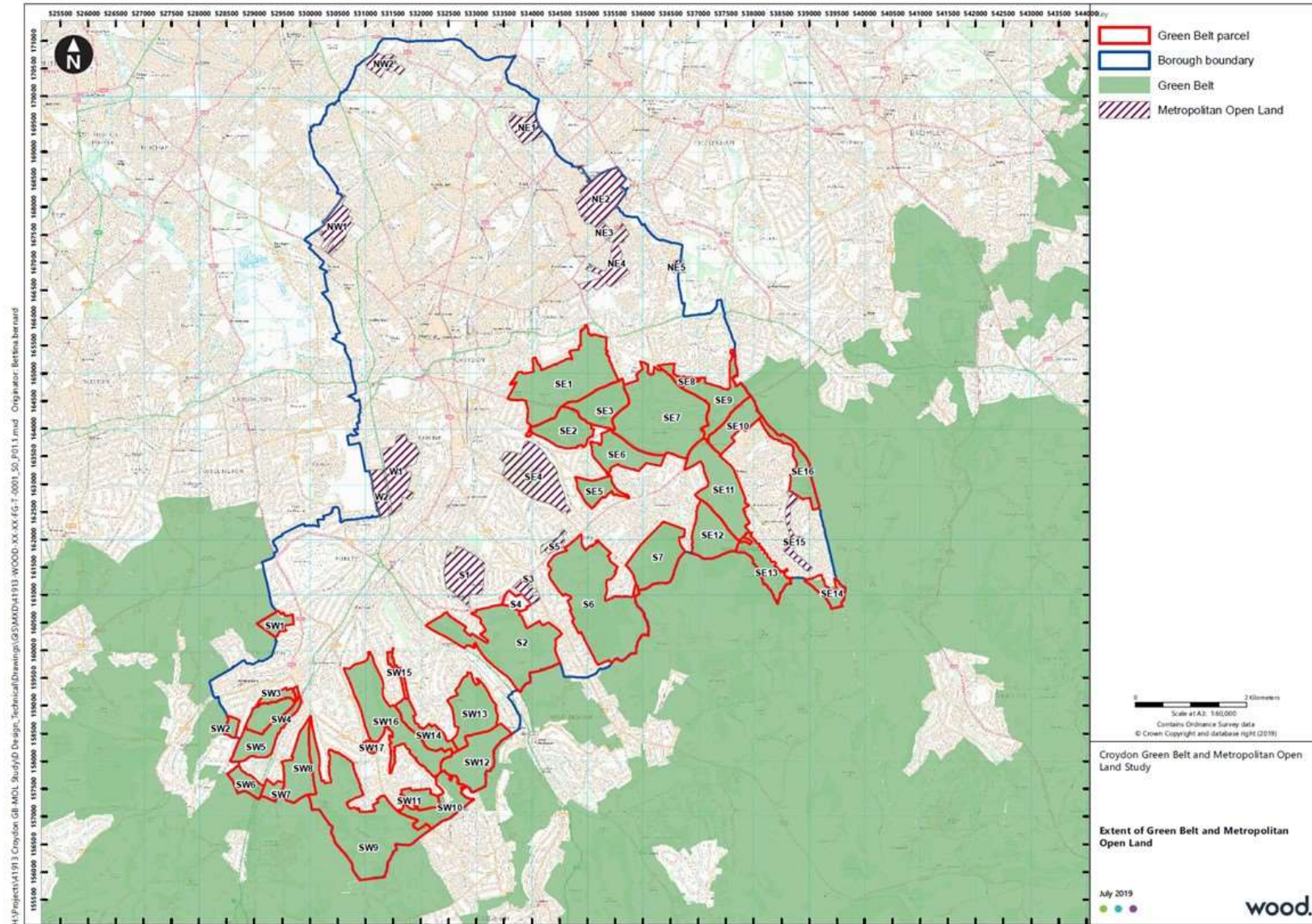


Figure 2.2 Green Belt and MOL Parcels Surveyed (North)

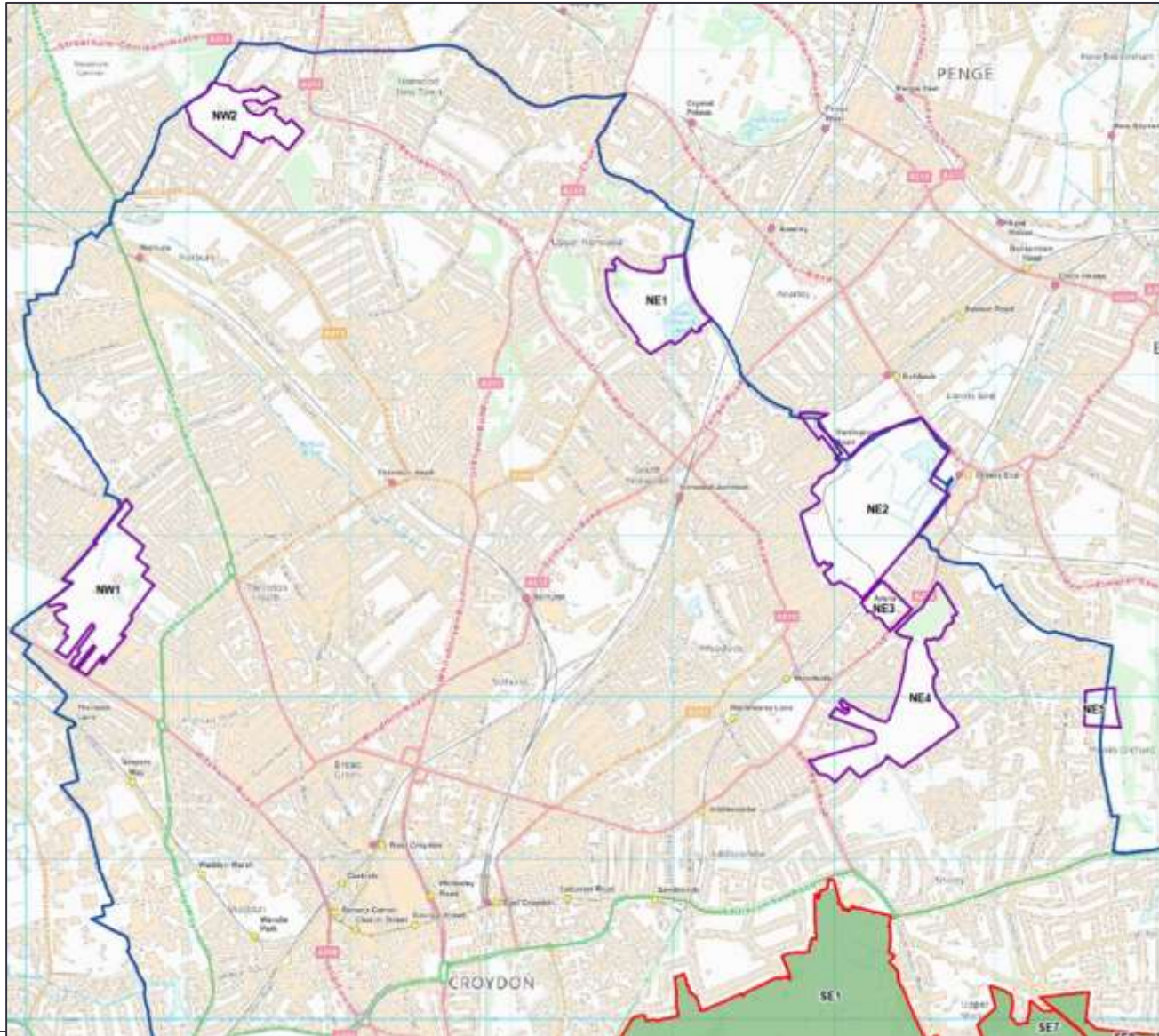


Figure 2.3 Green Belt and MOL Parcels Surveyed (Central)

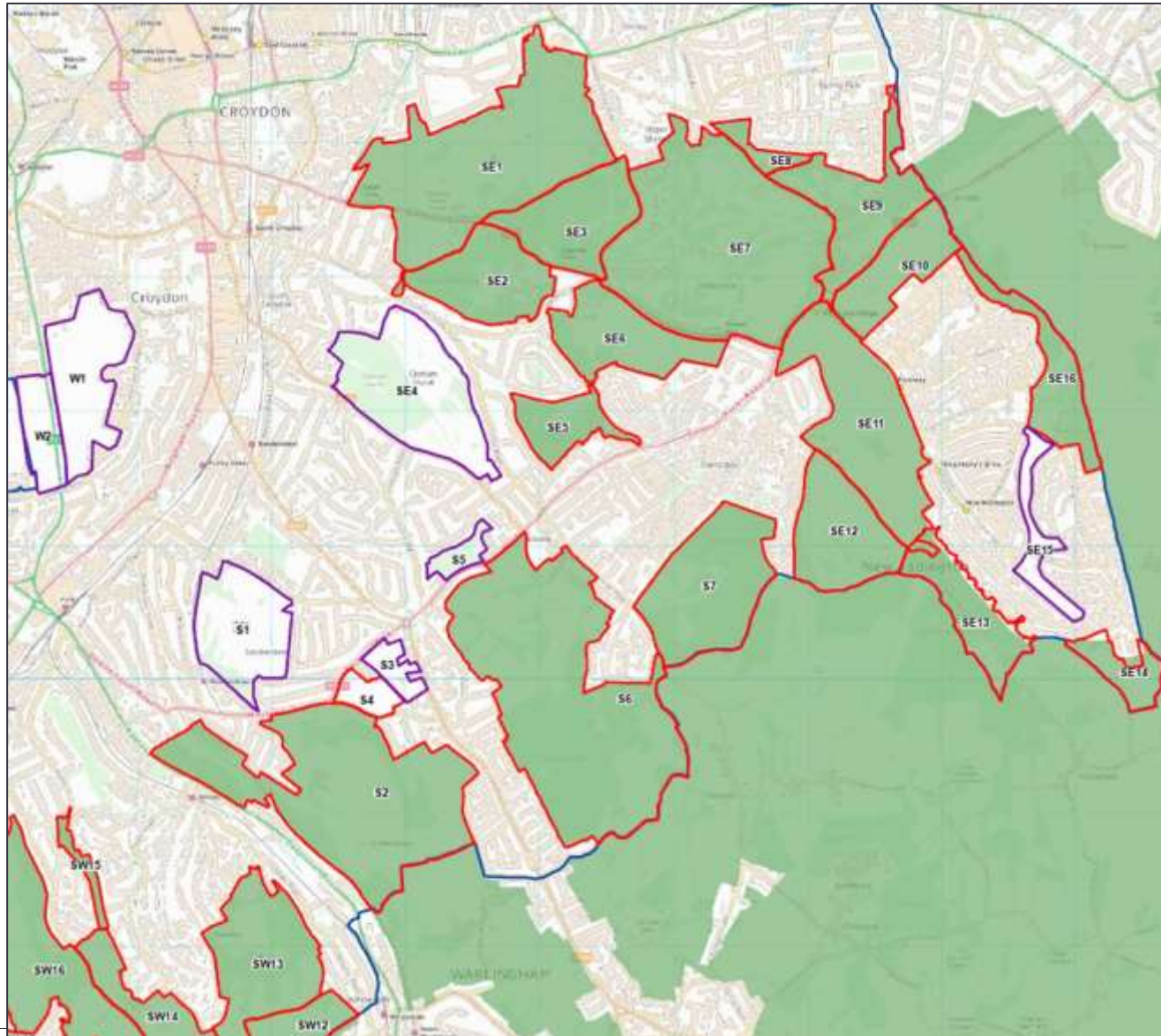
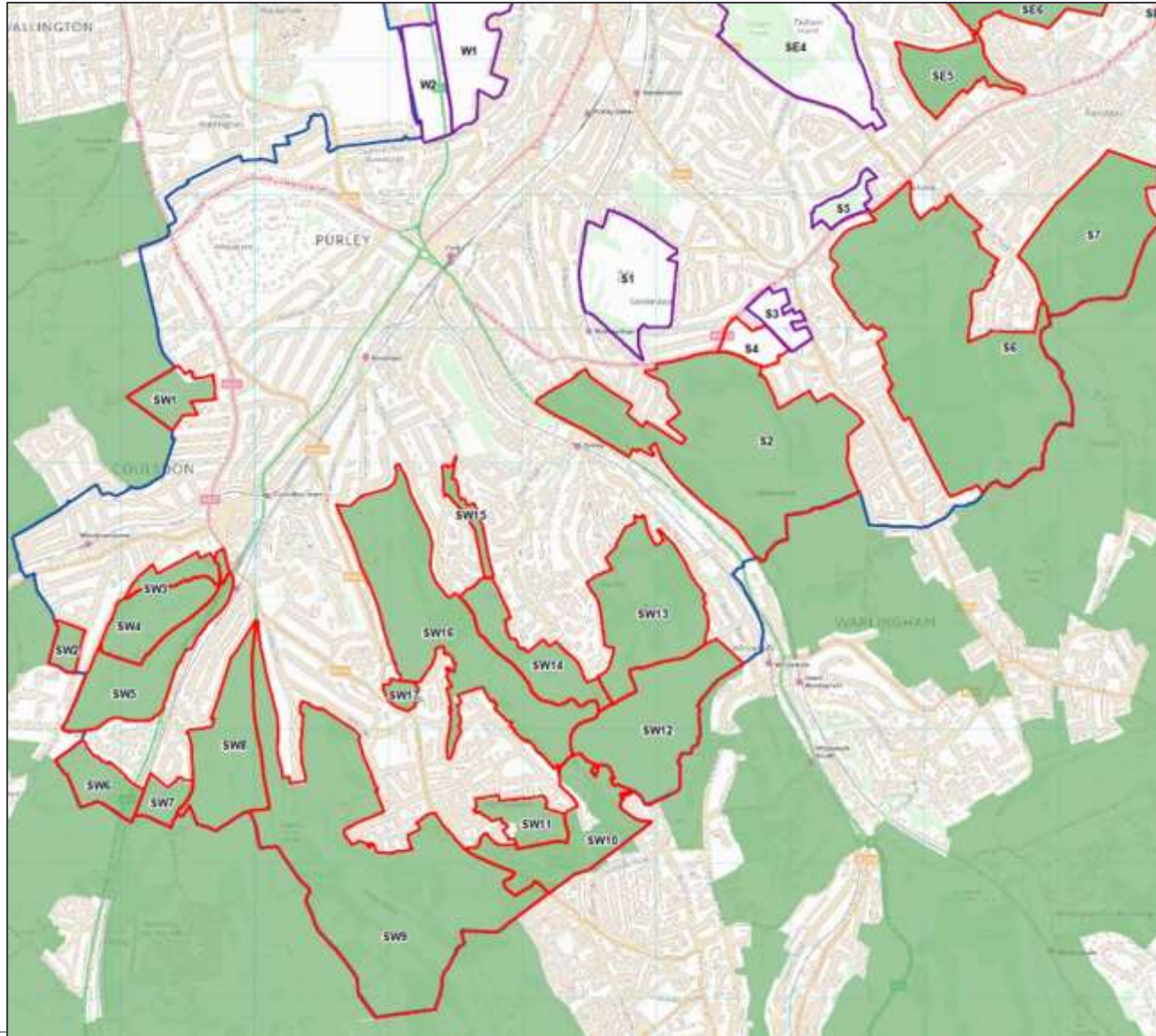


Figure 2.4 Green Belt and MOL Parcels Surveyed (South)



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

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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



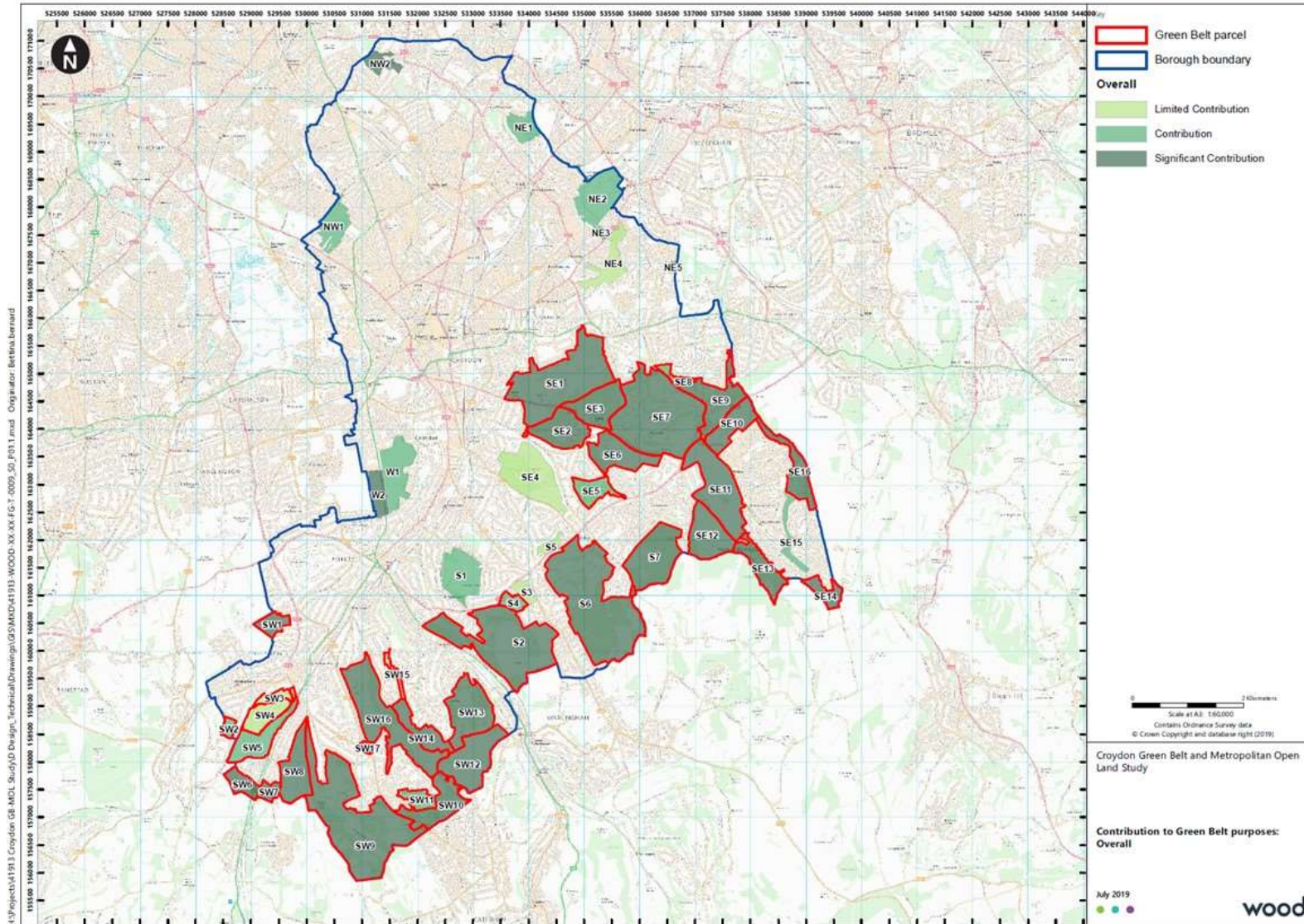


Figure 3.2 Overall Contribution to Metropolitan Open Land Criteria

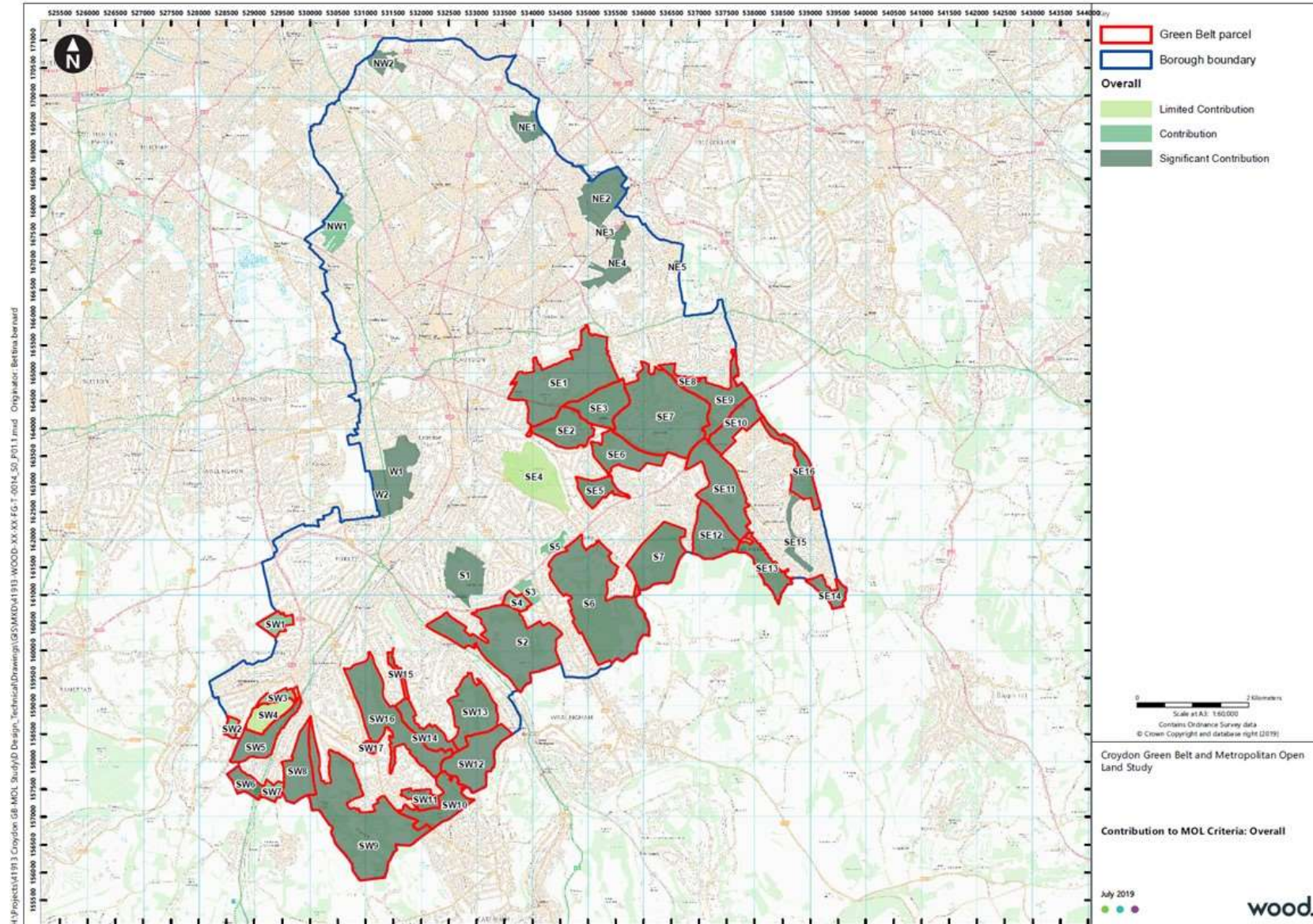


Table 3.1 Assessment of Contribution to Green Belt and Metropolitan Open Land Criteria (see Appendix A for detailed parcel-by-parcel assessment)

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

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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	
																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

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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	
	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.

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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
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.	

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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
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



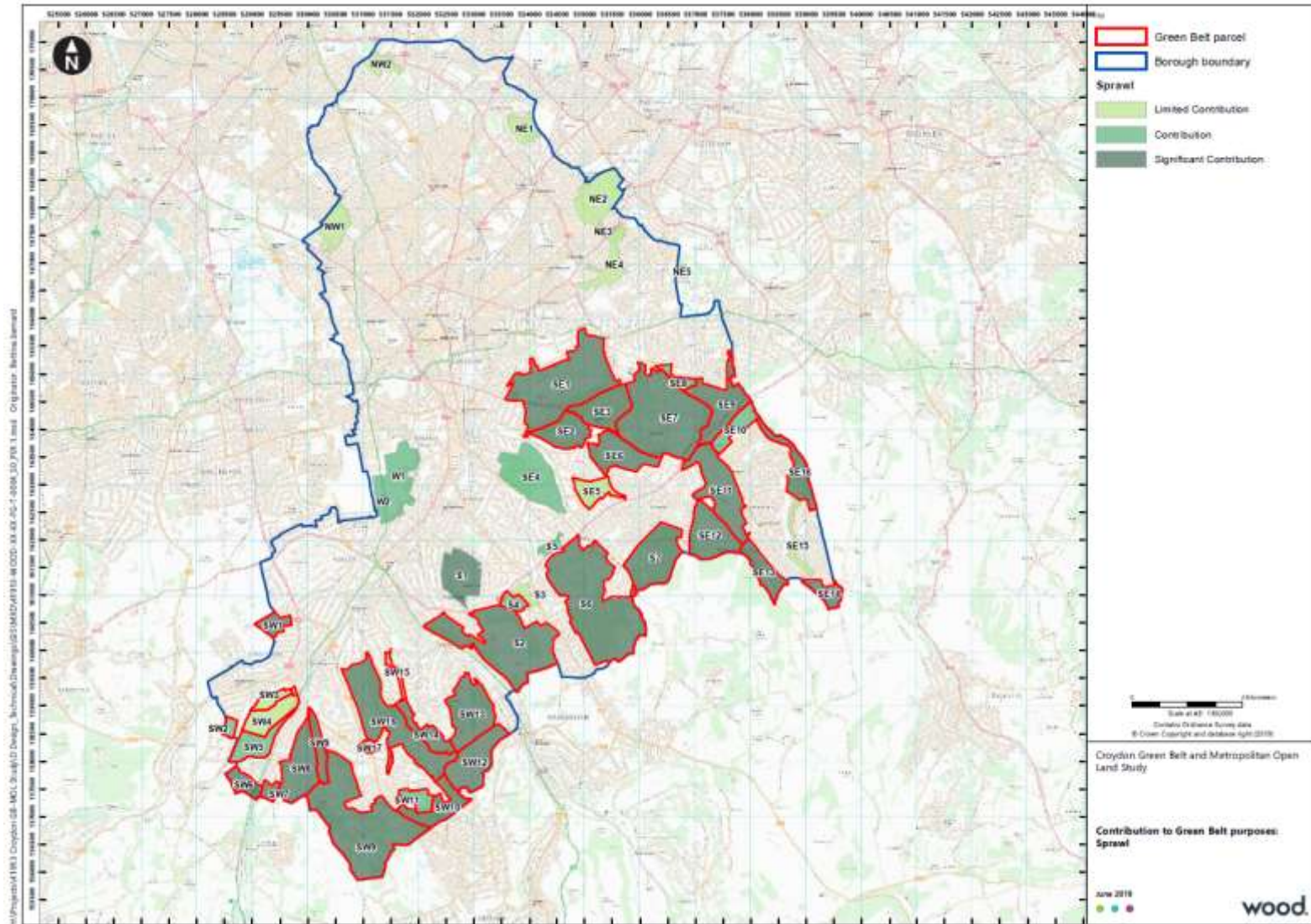


Figure 3.4 Contribution to Preventing Towns from Merging



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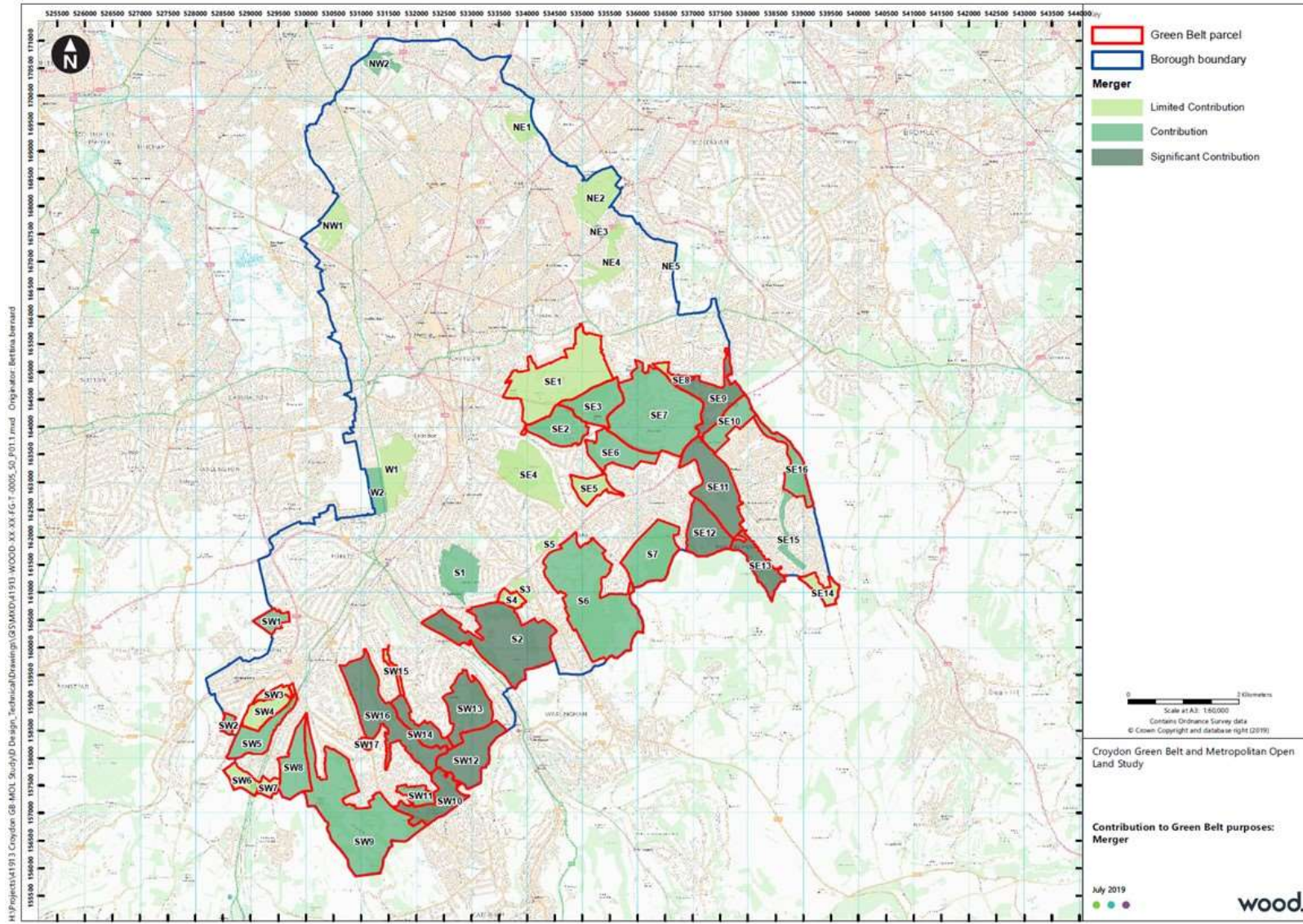


Figure 3.5 Contribution to Safeguarding the Countryside from Encroachment



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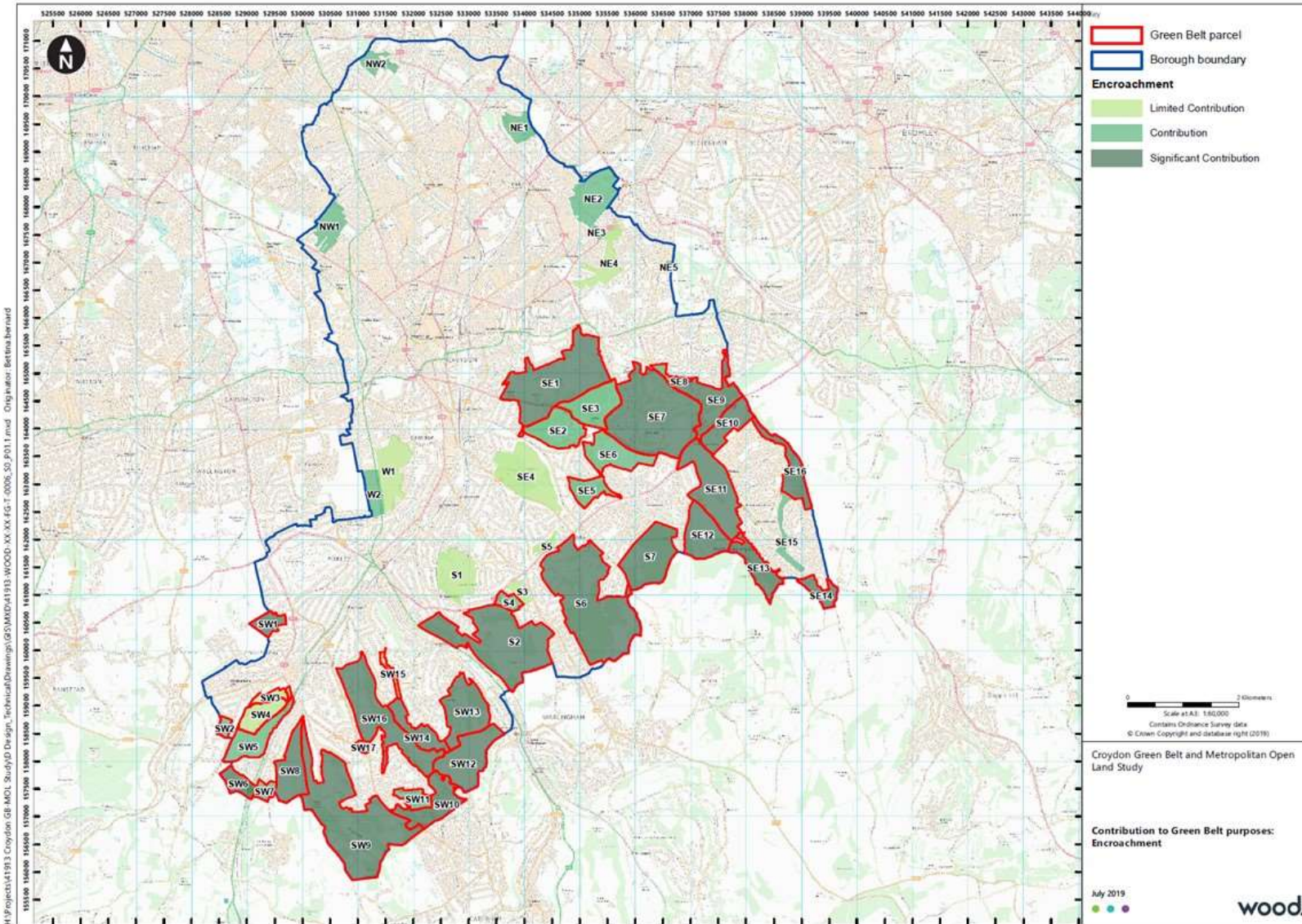
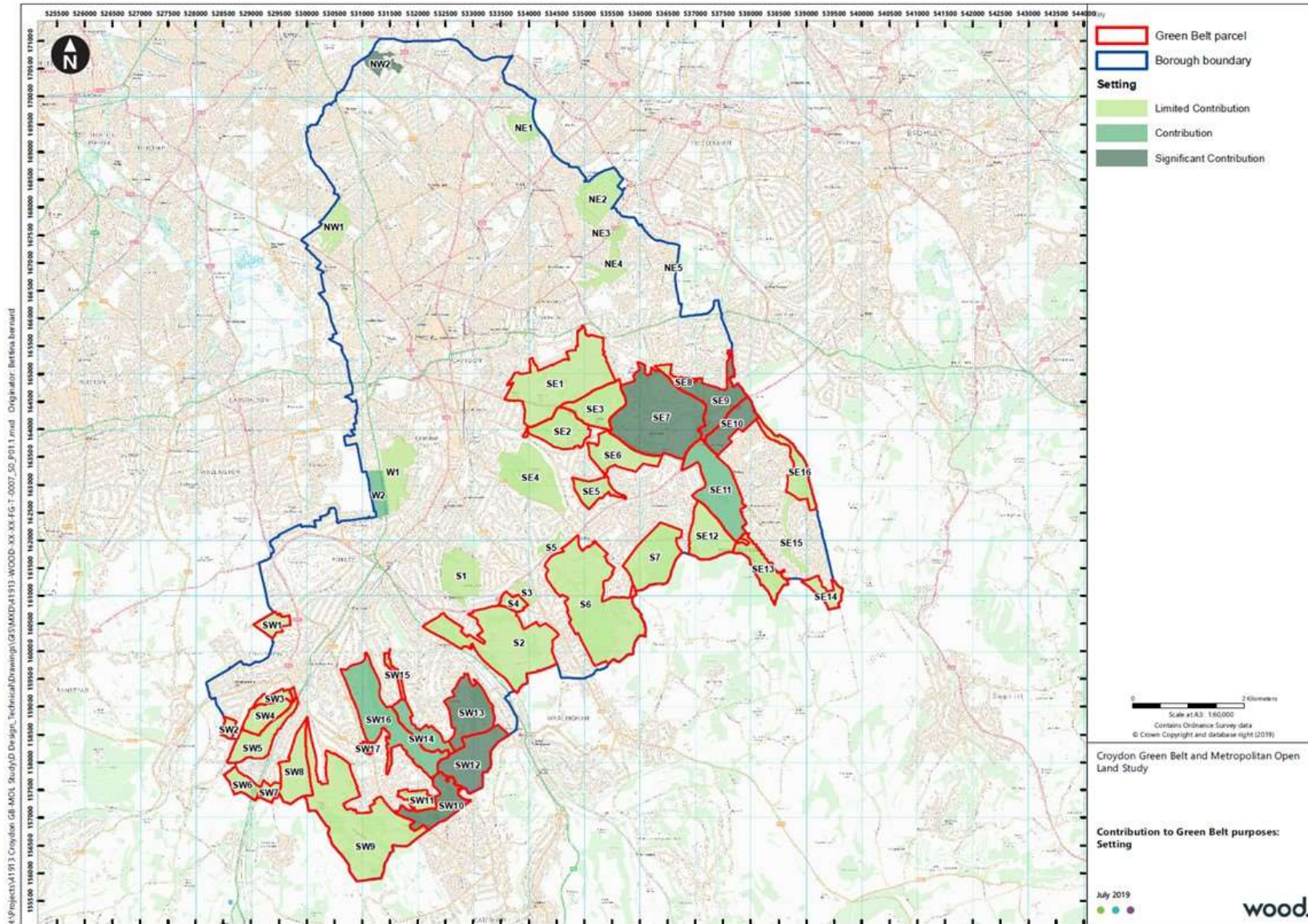


Figure 3.6 Contribution to Setting





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

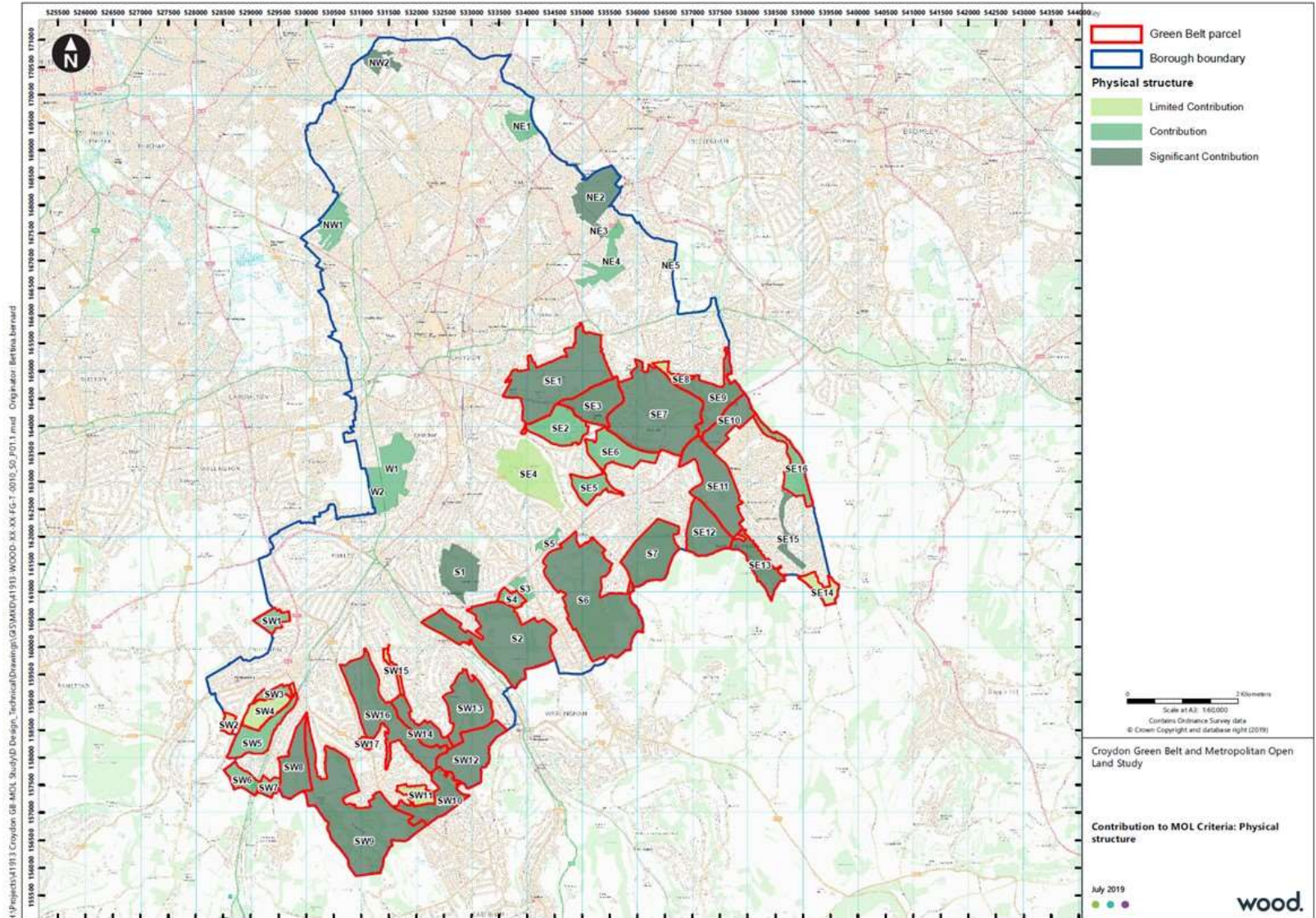


Figure 3.8 Includes open air facilities which serve either the whole or significant parts of London

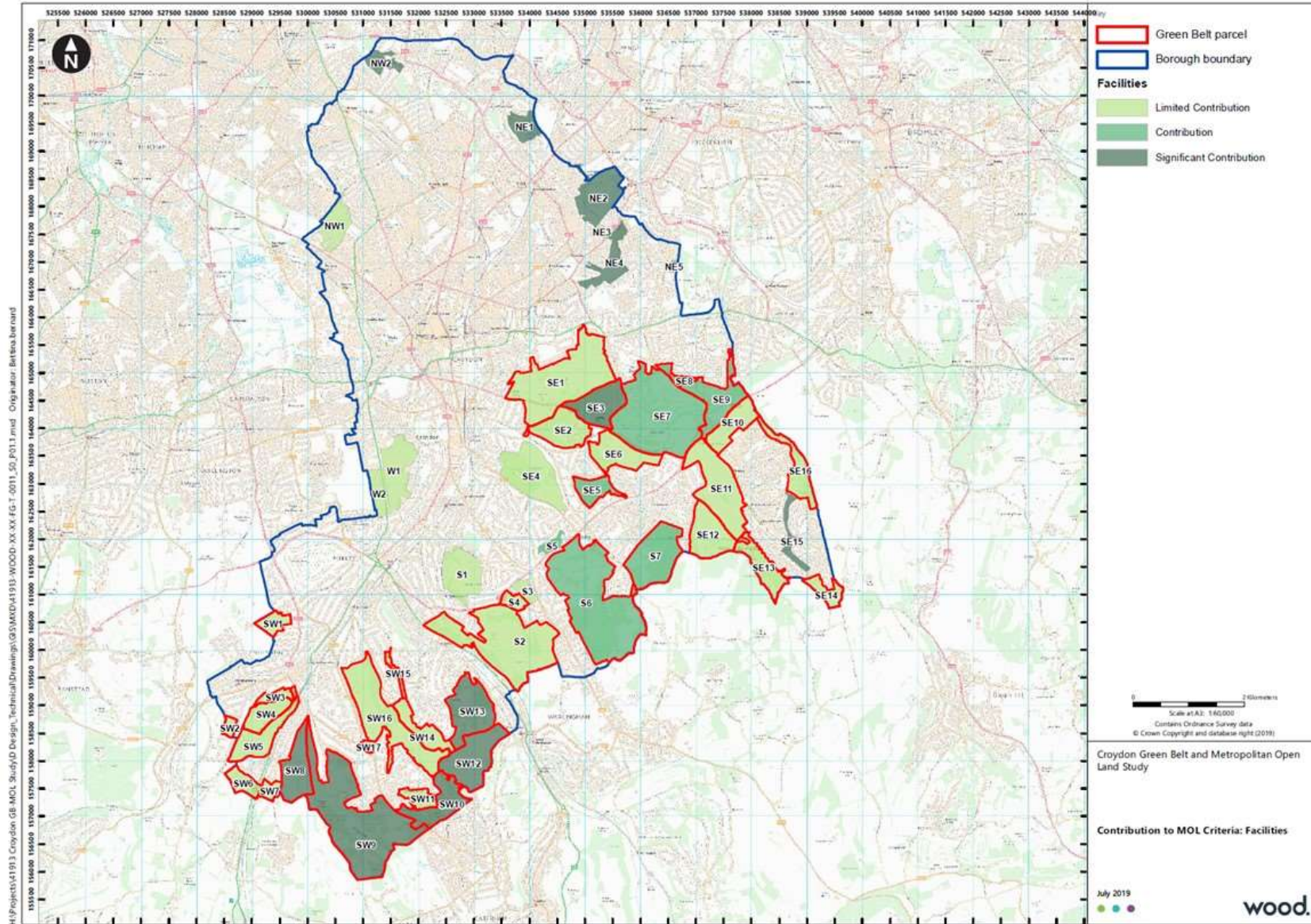


Figure 3.9 Contains features or landscapes of national or metropolitan value

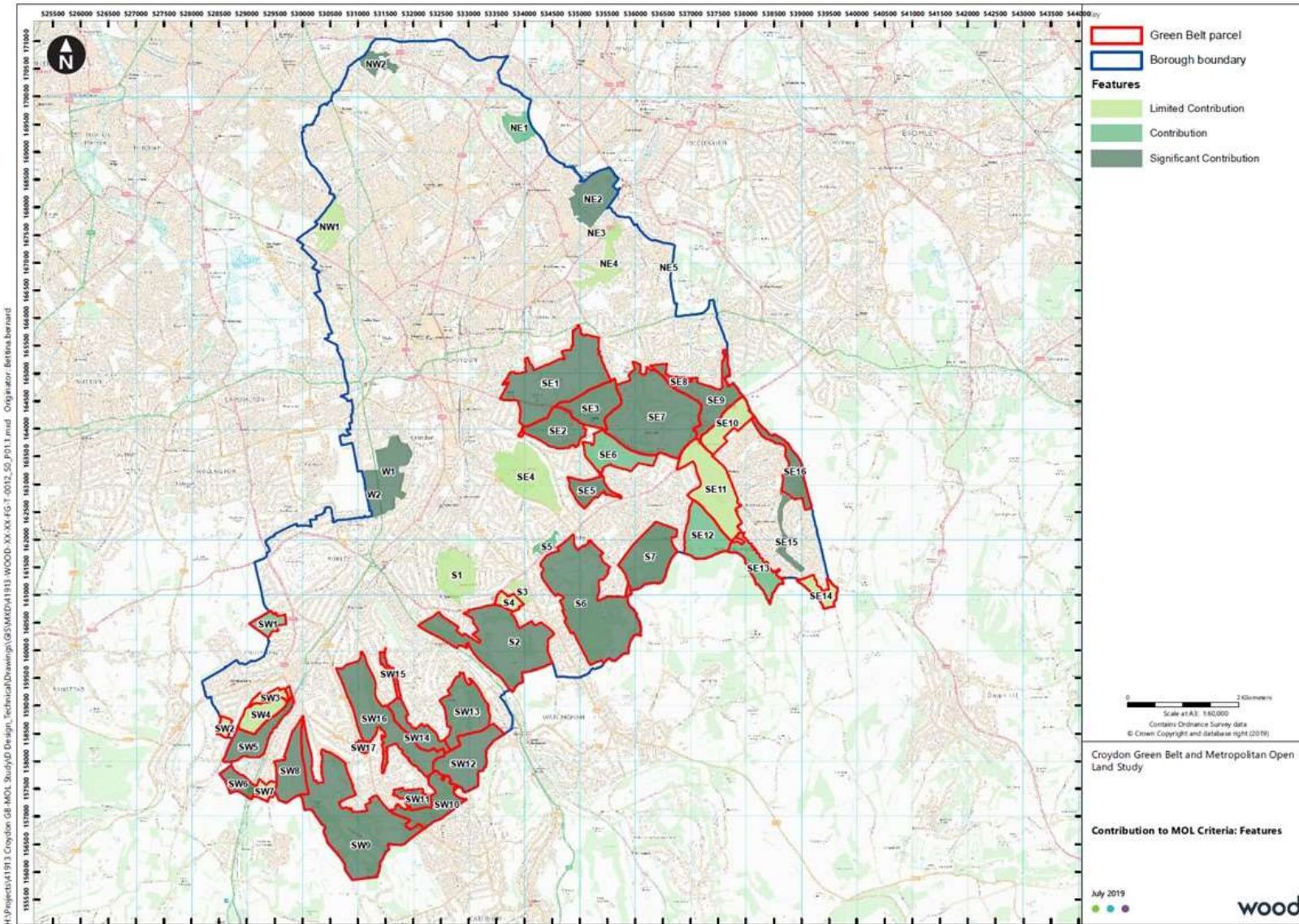
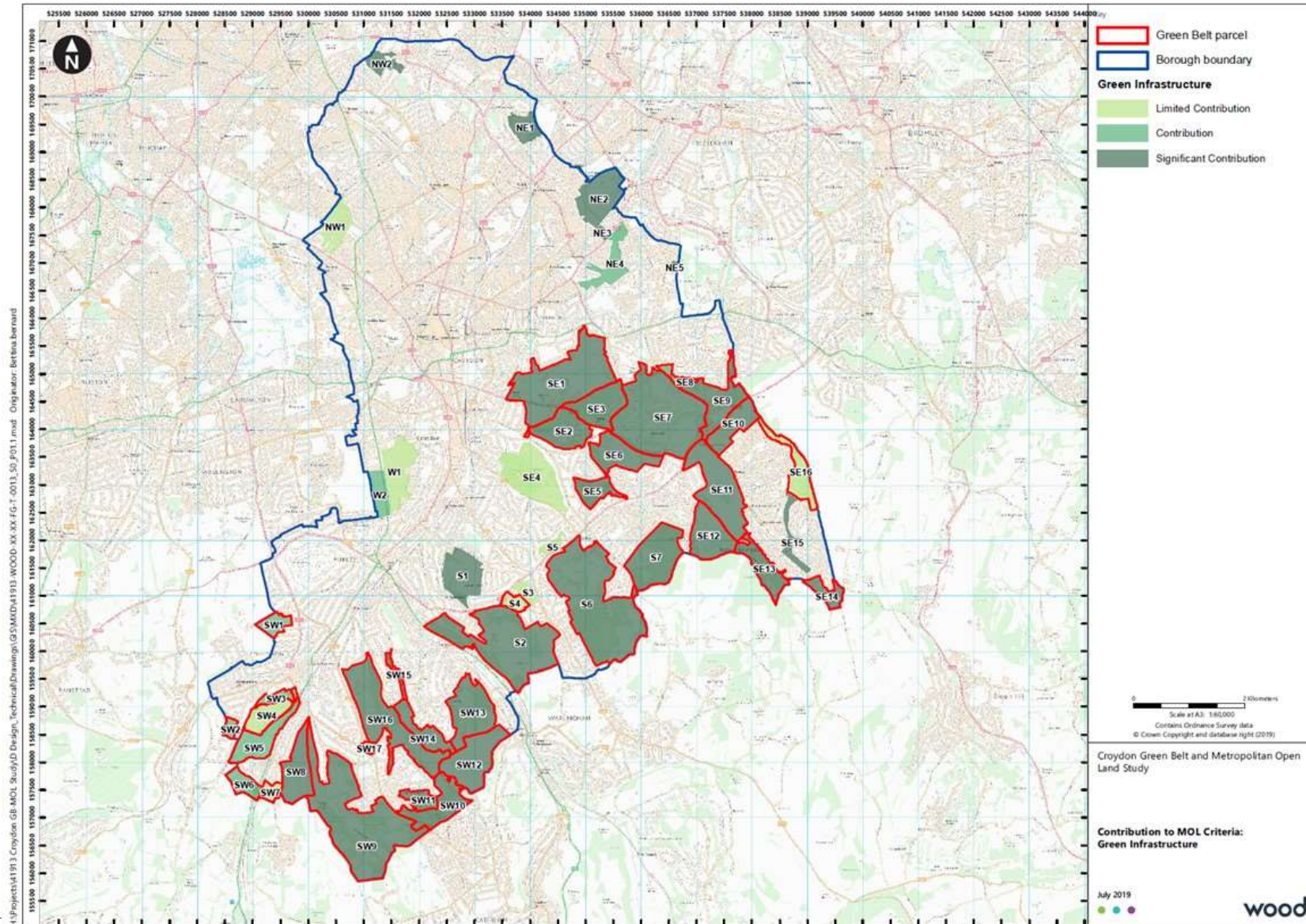


Figure 3.10 Forms part of a Green Chain or a link in the network of green infrastructure



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

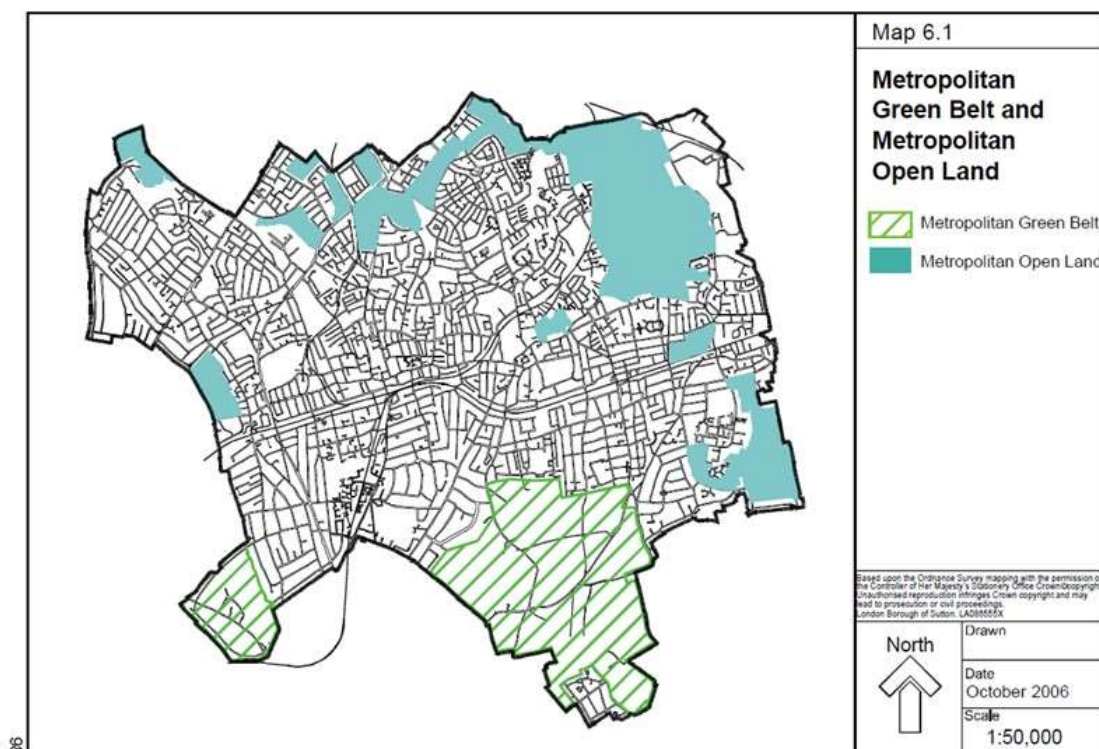
Adjoining Local Authority Green Belt Reviews

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.	



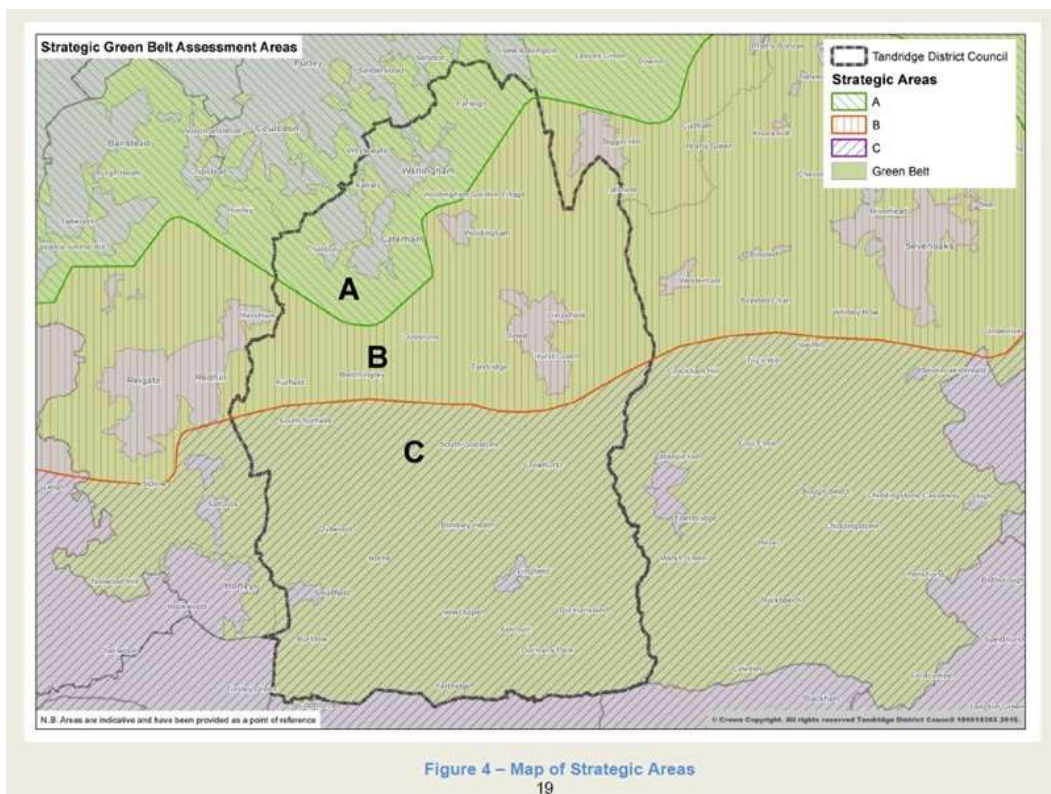
Tandridge District Council

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.



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.

Draft - see disclaimer

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

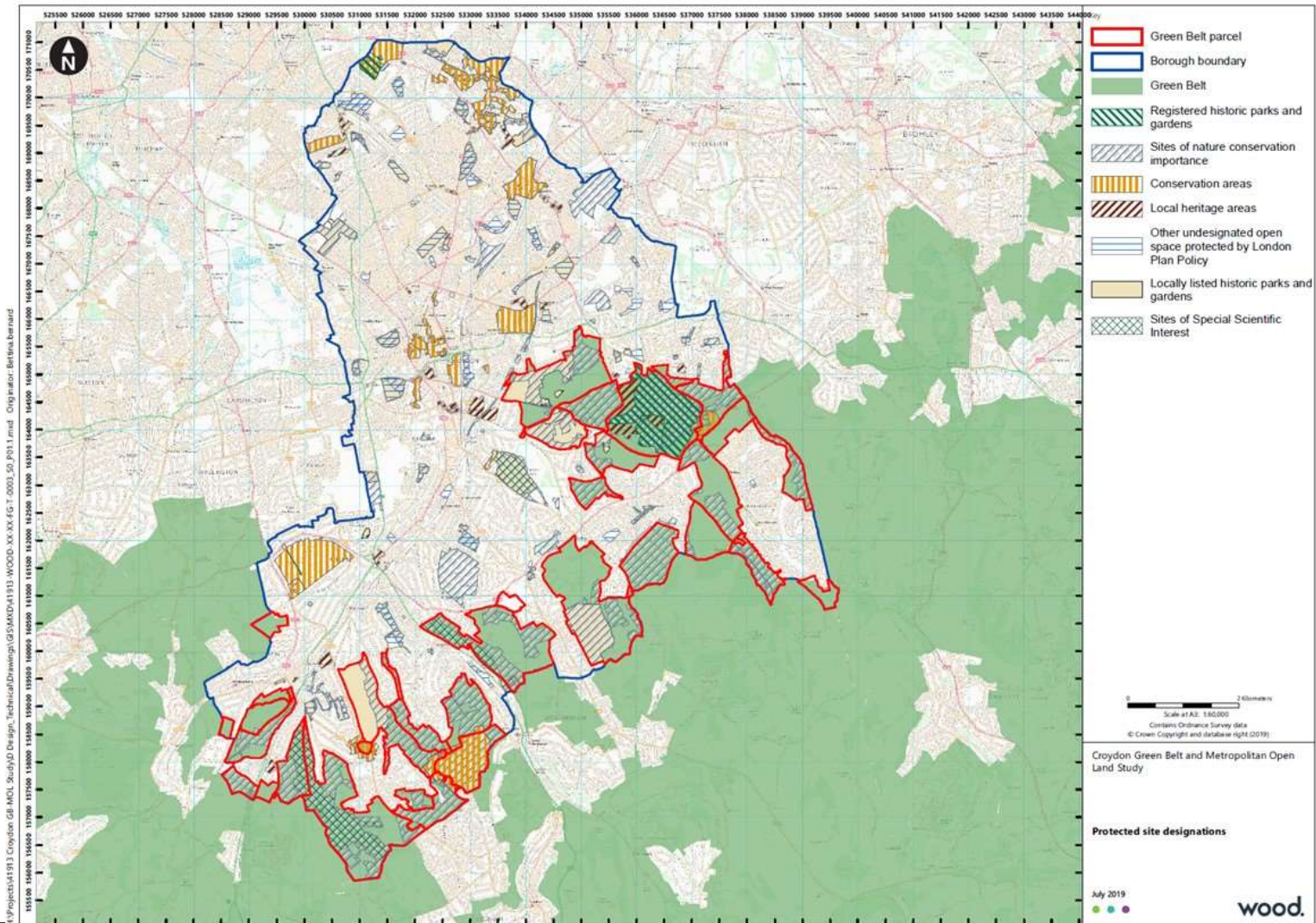
AFI 008	Strip of Green Belt that separates Caterham on the Hill/Caterham Valley and Whyteleafe	<p>This Area for Further Investigation is identified in the parcel assessment of GBA 004 set out in the Green Belt Assessment (Part 1)(December 2015) as a buffer between Caterham Valley, Caterham on the Hill 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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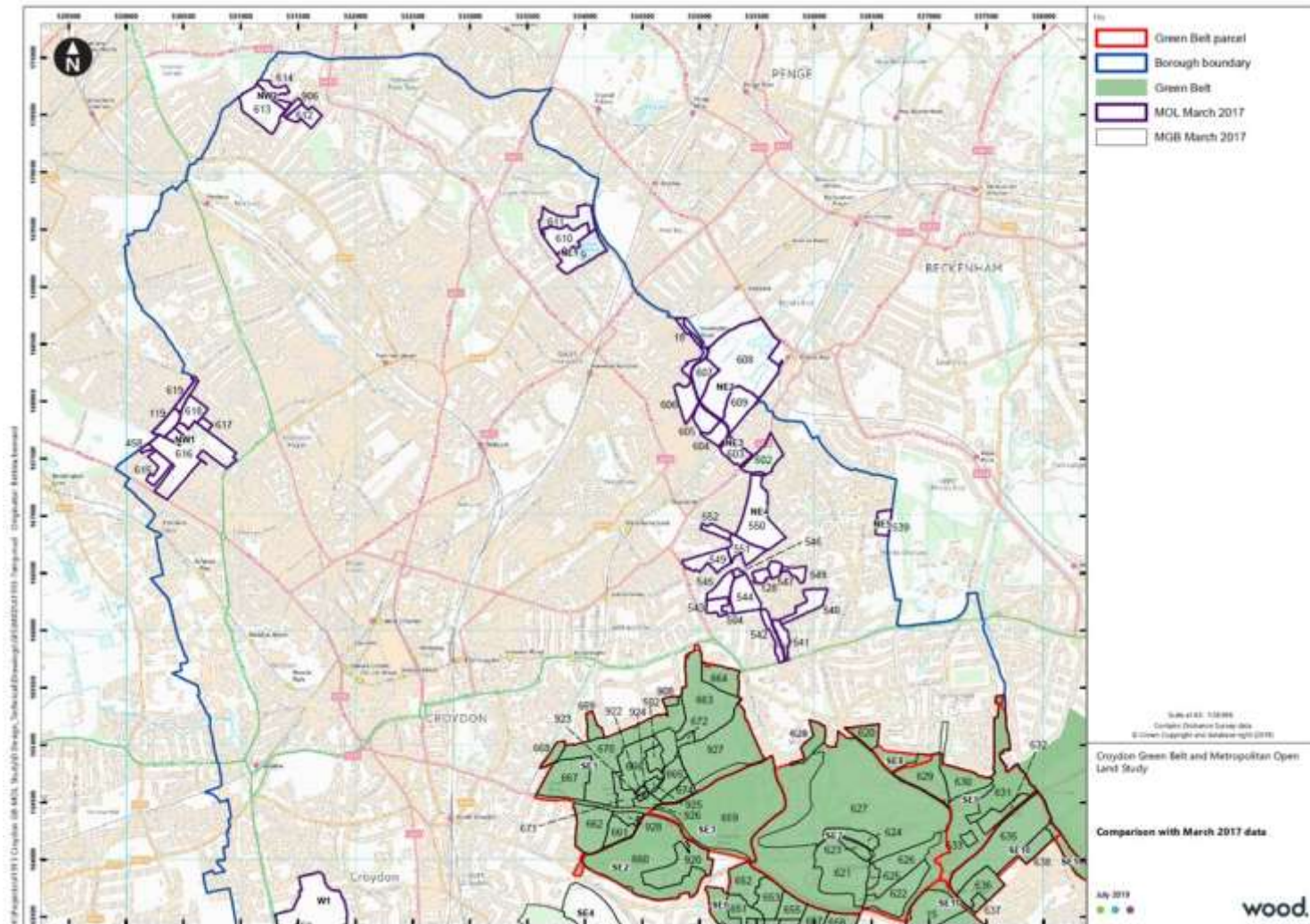
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Appendix D

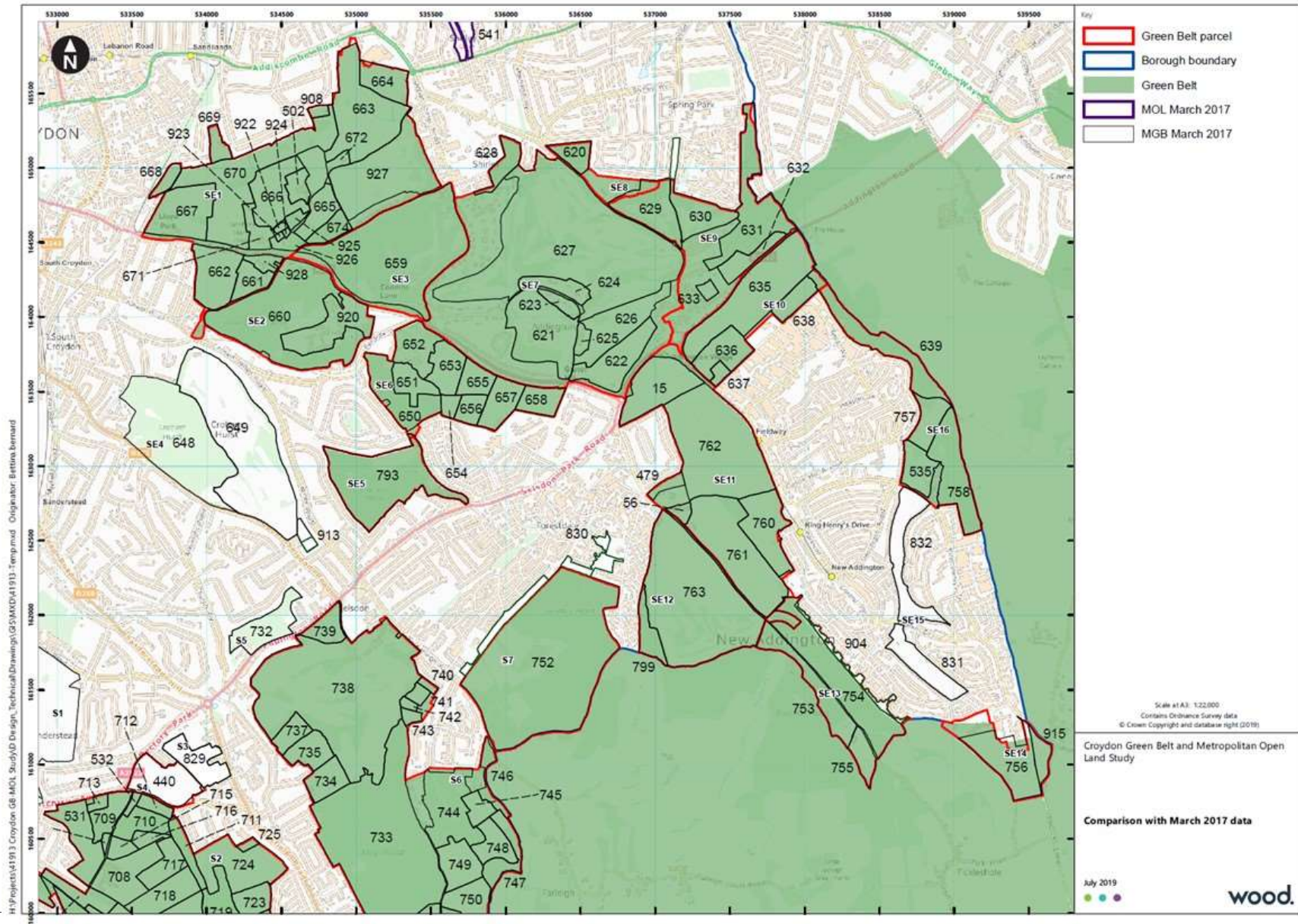
Relationship between 2016 Study Parcels and 2019 Assessment Parcels

NORTH
DETAIL



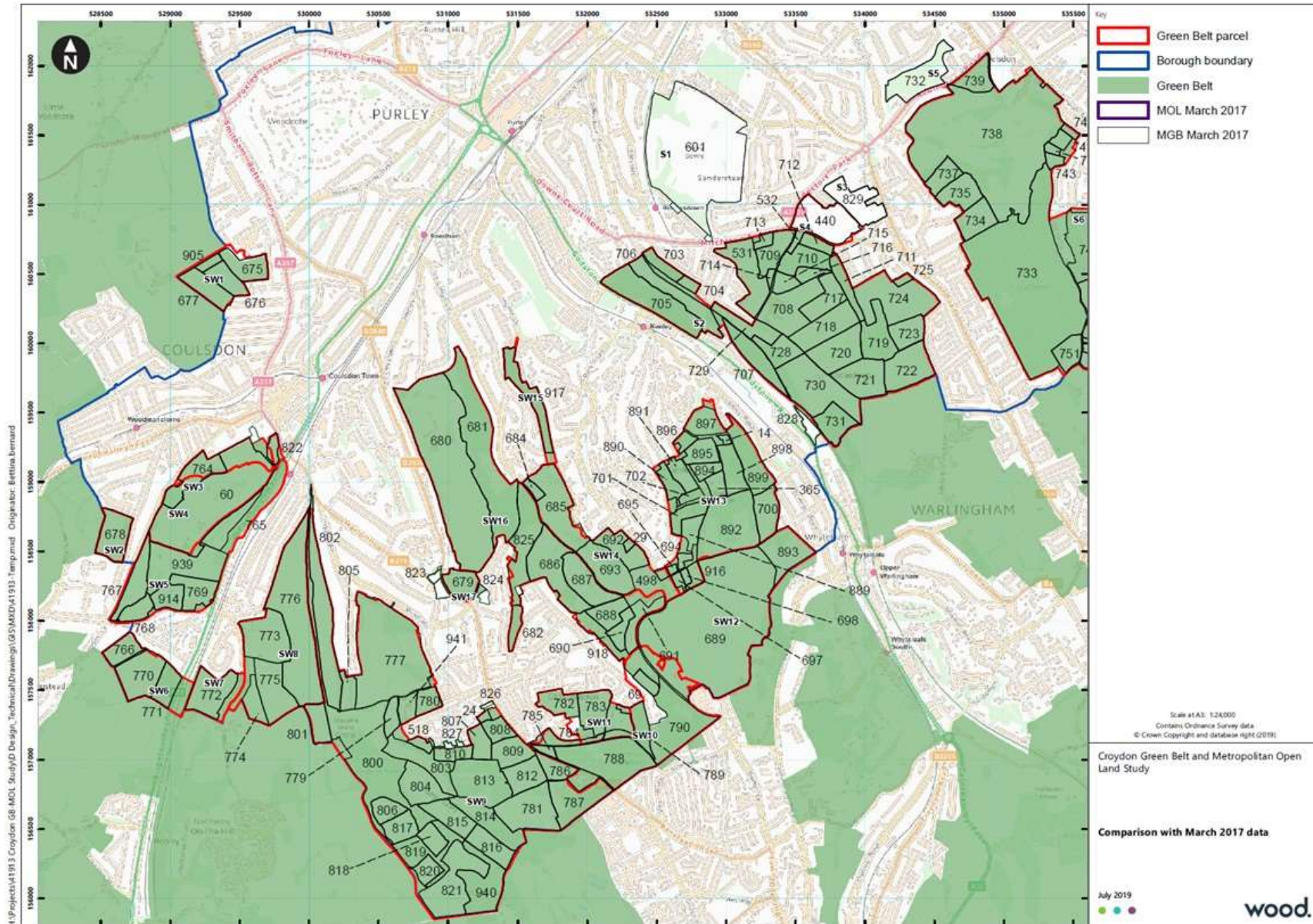


CENTRAL
DETAIL





**SOUTH
DETAIL**



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