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London Green Belt Assessment

Greater London Report

Prepared for the Greater London Authority

Final report
Prepared by LUC
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Contents

Chapter 1 5
Introduction

Consultation 7
Report format and structure 9

Chapter 2 10
Methodology

The location and scale of assessment areas 10
Previously developed land 17
Assessment of Green Belt contribution and definition of grey belt land 19
Purpose A – to check the unrestricted sprawl of large built-up areas 19
Purpose B – to prevent neighbouring towns merging into one another 24
Purpose C – to protect the countryside from encroachment 29
Purpose D – to preserve the setting and special character of historic towns 31
Purpose E – to assist in urban regeneration 33
Fundamental impacts to remaining Green Belt land 34
London-wide assessment outputs 37
Commissioning London borough assessment outputs 37
Potential further work 38

Chapter 3 39
Borough Findings

Potential grey belt land 39
Possible fundamental impacts to remaining Green Belt land 40
Contribution to Green Belt Purpose E – to assist in urban regeneration 40
Barking and Dagenham 41
Barnet 56
Bexley 77
Bromley 92
Croydon 120
Ealing 137
Enfield 151
Haringey 172

Harrow 186
Havering 206
Hillingdon 230
Hounslow 255
Kingston 269
Newham 286
Redbridge 300
Richmond 321
Sutton 334
Waltham Forest 351
Making Green Belt planning decisions 368

Chapter 4 **370**
Overall Potential Distribution of Grey Belt Across London

Appendix A **378**
Green Belt Towns

Appendix B **401**
Study Context

Appendix C **421**
Consultation Summary

References **427**

Chapter 1
Introduction

1.1 LUC was commissioned by the Greater London Authority (GLA) and 12 of its participating London Boroughs to undertake an independent, robust and transparent strategic assessment of all Green Belt land in Greater London. LUC has assessed the strategic contribution of Green Belt land and has identified where there is currently potential to define it as grey belt land in line with relevant planning policy, guidance and case law. LUC was assisted in the study by We Made That who led on stakeholder engagement throughout the assessment process.

1.2 The study does not attempt to definitively conclude whether any Green Belt land meets the grey belt definition; it demonstrates where, in line with current national planning practice guidance, Green Belt land currently has the potential to be defined as grey belt land. This study cannot in isolation identify land that is suitable for development, or set out the necessary exceptional circumstances for releasing land from the Green Belt. This will be done by considering a range of factors and evidence being prepared by the GLA and the London boroughs. Final determination of the extent of grey belt land in each London borough is required by the London boroughs as Local Planning Authorities determining planning applications within and in close proximity to Green Belt land or making alterations to Green Belt boundaries through the local plan-making process.

1.3 This study will be used alongside wider evidence to inform the development of the next London Plan, including decisions regarding the distribution of London's housing need across the boroughs. It will also support London boroughs in their local plan making and development management processes. To this end, London boroughs may decide to build on the assessment findings with finer grained assessments where considered necessary. In addition, a few London boroughs have chosen to prepare their own Green Belt assessments to inform their local plan making and development management decisions in line with national planning policy and guidance.

1.4 The commissioning authorities are the:

- Greater London Authority;
- London Borough of Barking and Dagenham;
- London Borough of Barnet;
- London Borough of Ealing;

- London Borough of Enfield;
- London Borough of Haringey;
- London Borough of Harrow;
- London Borough of Hounslow;
- London Borough of Newham;
- London Borough of Redbridge **[See reference 1]**;
- London Borough of Richmond;
- London Borough of Sutton; and,
- London Borough of Waltham Forest.

1.5 Metropolitan Open Land (MOL) is not included in the scope of this Green Belt assessment as the policies set out in paragraph 155 of the NPPF do not apply to MOL. MOL and Green Belt are two different land designations, with differing purposes. The national Green Belt purposes set out in paragraph 143 of the NPPF do not apply to MOL, and vice versa, the purposes of MOL set out in the London Plan policy G3 (b) do not apply to Green Belt land.

1.6 During the preparation of this assessment, the Ministry for Housing, Communities and Local Government (MHCLG) published a range of proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system. Consultation feedback on the proposed changes was gathered from late December 2025 to early March 2026 with a view to publishing an updated version of the NPPF and associated Planning Practice Guidance (PPG) later in 2026. The proposed reforms do not impact the scope or implementation of the agreed methodology in this study; however, a change is proposed to the definition of 'grey belt' to remove reference to other NPPF 'Footnote 7' areas (excluding Green Belt). If this change is formally adopted after the publication of the reports associated with this study, all references and data relating to NPPF Footnote 7 areas and assets should be read as not directly relevant to the future formal definition of grey belt land in London boroughs. It is important to note that this change does not mean that such areas and assets are not relevant in evaluating the sustainability of proposals within or in close proximity to Green Belt land. They are still important considerations in establishing both 'sustainable patterns of development' through plan-making, and minimising and managing environmental harm of proposed development through development management decisions on Green Belt land.

1.7 NPPF Footnote 7 areas and assets have not influenced the location and extent of Green Belt land identified as having potential to be defined as grey belt land in this

study, given the need for more detailed work to determine whether such areas and assets provide a strong reason for refusing or restricting development in potential grey belt locations. Furthermore, as a strategic Green Belt assessment covering Greater London as a whole, this study does not definitively define grey belt land across the city. Final determination of the extent of grey belt land in each London borough is required by each London borough as Local Planning Authorities.

Consultation

1.8 A method statement was prepared by LUC in consultation with the GLA and has been the subject of legal review by Douglas Edwards KC (Francis Taylor Building Chambers). It set out the proposed methodology for assessing Greater London's Green Belt and defining grey belt land.

1.9 It was prepared for consultation with the GLA, commissioning and cooperating London Boroughs and key statutory consultees:

- Transport for London (TfL);
- Historic England;
- Natural England;
- Environment Agency;
- Department for Environment, Food and Rural Affairs (DEFRA);
- Ministry of Housing, Communities and Local Government (MHCLG);
- London Borough of Barking and Dagenham;
- London Borough of Barnet;
- London Borough of Bexley;
- London Borough of Bromley;
- London Borough of Ealing;
- London Borough of Enfield;
- London Borough of Havering;
- London Borough of Haringey;
- London Borough of Harrow;
- London Borough of Hounslow;
- London Borough of Kingston;

- London Borough of Newham;
- London Borough of Redbridge;
- London Borough of Richmond;
- London Borough of Sutton; and,
- London Borough of Waltham Forest.

1.10 Consultees were invited to review and comment on the methodology prior to the assessments being undertaken. A pilot illustrating how the methodology would be applied in practice was also circulated to the 12 participating boroughs and stakeholders for comment. Douglas Edwards KC was also asked to carry out a legal review of the methodology and the pilot.

1.11 While any constructive feedback received through this process was welcomed, consultees were specifically asked to help define and confirm application of a number of key terms within the London context, and provide any additional supporting evidence relating to:

- The definition of 'large built up areas' and what is considered to be 'near to them' (relevant to the assessment of contribution to Purpose A).
- The definition of 'towns' (relevant to the assessment of contribution to Purpose B) outlined in **Appendix A**.
- The definition of 'historic towns' (relevant to the assessment of contribution to Purpose D).
- Confirmation of the full list of NPPF footnote 7 assets or areas that must be considered in the definition of grey belt land.

1.12 All comments were summarised in a consultation log, after which the assessment methodology and outputs were finalised, both having been confirmed to be sound following legal review. A summary of the method statement consultation, including details of how the methodology was refined in to the final version in **Chapter 2** is included in **Appendix C**.

1.13 The assessments for each area were undertaken in batches. Meetings were held with the 12 commissioning authorities to inform the assessment, after which the assessment findings for each borough were finalised. A summary of the commissioning authorities comments on the assessment and reporting process and responses is also included in **Appendix C**.

1.14 Finally, the overall findings were presented to all of the participating boroughs prior to the publication of the assessment findings at the city and constituent borough

scale. Consultees were invited to review the assessed contribution of Green Belt land directly adjoining their borough boundary in neighbouring London Boroughs, as well as review the final draft wording of the main body of the report.

Report format and structure

1.15 This report is in an 'Accessible format', which means it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018), as set out in the Web Content Accessibility Guidelines (WCAG 2.1). It has larger font, larger spacing between lines and headings, 'alternative text' provided for all figures and it can be read by screen-reading software.

1.16 The rest of the main body of the report is structured as follows:

- **Chapter 2** sets out the final methodology that was used to undertake the assessment;
- **Chapter 3** provides a summary of the assessment findings in each borough;
- **Chapter 4** draws the individual borough findings together and provides an overview of the study findings across London;
- **Appendix A** identifies the towns relevant to the assessment of contribution to Purpose B (to prevent neighbouring towns merging into one another) within and around each of the 18 London boroughs with Green Belt land';
- **Appendix B** puts the methodology in context, describing the metropolitan Green Belt and relevant national and regional planning policy and guidance; and,
- **Appendix C** provides a summary of consultation undertaken, including details of how the methodology was refined.

Chapter 2
Methodology

2.1 This chapter outlines the methodology used for the London Green Belt assessment, with reference to relevant planning policy, practice guidance and case law. The Planning Practice Guidance (PPG), published in February 2025, is particularly relevant and fully underpins the approach taken. A detailed review of national and regional planning policy and practice guidance can be found in **Appendix B**.

The location and scale of assessment areas

2.2 The PPG states that local planning authorities must identify an appropriate scale of Green Belt assessment that clearly identifies variations in contribution to the Green Belt purposes, covering all Green Belt land within a Plan area in the first instance and responding to local circumstances. The Plan area within this study is defined as Greater London influenced by the London Plan.

2.3 The PPG is clear that 'a small number of large assessment areas will not be appropriate in most circumstances – authorities should consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary.' Local circumstances may dictate, for example, the need for smaller assessment areas in areas where there is greater variation in contribution to the Green Belt purposes, or greater potential for sustainable development, such as around existing settlements or public transport hubs or corridors.

2.4 LUC's approach to parcelling does not predefine parcels but instead identifies variations in a range of factors relevant to the NPPF's Green Belt purposes and the illustrative features relevant to their assessment outlined in the PPG, such as the proximity of relevant Green Belt settlements and gaps between neighbouring towns, openness and urbanising influence, the strength of Green Belt boundaries (at urban edges and in the Green Belt), variations in topography and physical and visual relationships with the wider open countryside.

2.5 The defined areas are the final product of the assessment, reflecting the range of variations in Green Belt contribution to the NPPF's Green Belt purposes identified through the application of the PPG.

2.6 The objective of this approach is to ensure that, as far as possible, the contribution ratings across any given parcel are appropriately representative of its

relevant features and there are no significant areas within each parcel that contribute significantly differently to the Green Belt purposes based on the application of the PPG.

2.7 The size, shape and distribution of parcels is influenced by the degree of variations in features relevant to the assessment of Green Belt contribution, rather than solely based on other factors such as the presence of permanent boundary features. Parcel areas vary in size depending on the range of factors (within and in their immediate vicinity) affecting their contribution – no single factor is given precedence, for example boundaries, all are considered in the round. Parcels closer to urban areas are likely to be subject to a greater range of factors influencing their contribution compared to more remote areas in the open countryside, resulting in smaller parcels at urban edges and larger parcels in the open countryside respectively.

2.8 For the commissioning boroughs, more justification for the defined extent of each Green Belt parcel identified has been provided in the form of detailed parcel proforma reports for use at the more local level. They clearly explain the identified variations in the assessed factors influencing each parcel's rated contribution to the Green Belt purposes, justifying each parcel's definition as a standalone parcel.

2.9 This is an approach that LUC has successfully used in all its recent Green Belt assessments and has been considered robust by inspectors at Local Plan Examinations. The benefits of this approach is that:

- it avoids misleading results where predefined areas have variations in contribution within a parcel that are averaged out.
- potential strategic development sites can be overlayed with the findings of the Green Belt assessment to get an initial strategic understanding of the contribution they make to the Green Belt purposes.

2.10 Parcel boundaries typically follow readily recognisable physical features, including natural features such as waterways and water bodies, woodlands and topographical features, and manmade features such as roads and railway lines and field boundaries) where possible. This is considered helpful in the use of the assessment findings for Green Belt boundary review and the implementation of paragraph 149f of the NPPF which states 'When defining Green Belt boundaries, plans should…define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.' However, it is important to make a clear that parcel boundaries have not been prioritised over the principles referenced in PPG under the header 'How should authorities define land to be assessed?', which makes no reference to boundaries.

2.11 The definition and assessment of parcels that prioritise following strong boundary features over the illustrative features referenced in the PPG as relevant to the assessment of contribution to the Green Belt purposes maybe more vulnerable to challenges criticising a lack of granularity and/or the potential misleading nature of Green Belt judgements.

2.12 All Green Belt land within Greater London is assessed using the methodology outlined and agreed in this study. Green Belt land beyond Greater London has not been assessed in this study; however, impacts on remaining Green Belt land (both within and outside Greater London) have been considered, in line with the PPG.

2.13 The granularity of the study, in terms of the resultant number of identified assessment parcels, is directly influenced by the rating scale and defined minimum parcel size, as described below.

Rating scale

2.14 The PPG is not prescriptive in terms of the definition of rating scales but, for the purposes of identifying grey belt land, it provides illustrative examples of features that would characterise ‘strong’, ‘moderate’ and ‘weak/no’ levels of contribution to the relevant Green Belt purposes (A, B and D).

2.15 Regardless of where grey belt land is defined by London boroughs, a plan area’s growth needs and the need for development to be in sustainable locations may still require consideration of the release of Green Belt land that does not meet the grey belt definition, therefore Green Belt purposes C and E must also be rated as part of this study.

2.16 This London-wide assessment of Green Belt land is designed to follow the same rating scale referenced in the PPG: ‘strong’; ‘moderate’; or ‘weak/no’. In addition, the commissioning London boroughs were given the option of receiving assessment outputs that provided a greater level of granularity within areas that make a strong contribution to the Green Belt, identifying areas of ‘very strong’ contribution within them. These very strong contribution areas are designed to highlight the areas of greatest contribution within each commissioning borough.

2.17 The ‘strong’ and ‘very strong’ contribution ratings, where applicable to purposes A, B or D, identify land that broadly does not meet the definition of grey belt (given that land that performs strongly to Purpose C and/or E can still meet the definition of grey belt land).

2.18 The release and/or development of strongly contributing Green Belt land is harder to justify, but NPPF paragraph 148 makes it clear that more sustainable greenfield sites on higher-performing Green Belt land (such as around train stations) can still be considered for allocation or permission where Exceptional or Very Special Circumstances apply.

2.19 The rating of land that does not perform strongly as moderate or weak/no is in line with the PPG. It will also help, alongside sustainability considerations, to inform more nuanced judgements as to what land should be considered for release and development within lower contributing, including grey belt, locations.

Minimum parcel size

2.20 The purpose of this study is to identify and spatially define variations in contribution to the Green Belt purposes. These variations must strike an appropriate balance between providing a strategic direction for growth across the city and allowing scope for the London boroughs to build on the assessment findings with more finer grain assessments designed to inform specific plan-making and development management decisions.

2.21 A minimum parcel size of 5 hectares (ha) was judged to be sufficiently granular to identify all strategic variations in contribution to the Green Belt purposes across Greater London, leaving scope for more detailed and proportionate assessments of specific sustainable site proposals at a later date where required. This was therefore the minimum parcel size adopted for this assessment.

2.22 In rare cases where smaller parcels of land (less than 5ha) are isolated by urban areas and/or truncated by borough boundaries, smaller areas were parcelled and assessed to ensure all Green Belt land within Greater London was assessed. Where such smaller parcels are isolated/truncated by borough boundaries and are contiguous with wider areas of Green Belt land in neighbouring authorities, the assessment has taken account of and made reference to wider parcel areas in any relevant parcel proforma descriptions.

2.23 Borough boundaries have not influenced the rating of Green Belt parcels; all variations in Green Belt contribution are influenced by the factors outlined in the methodology in the round. Wider contiguous Green Belt areas that share the same features and functions but are split by borough boundaries contribute the same to the Green Belt purposes. Variations in contribution to the Green Belt purposes between Green Belt parcels that share a borough boundary are justified with reference to the factors outlined in the methodology and not borough boundaries.

Verifying judgements in the field

2.24 The assessment process started as a desk-based assessment using a bespoke GIS mapping tool for Green Belt assessment, Ordnance Survey (OS) maps, Google Earth aerial and 'streetview' imagery. Following the initial definition and rating of Green Belt parcels, parcels containing or in close proximity to features that resulted in borderline judgements between Green Belt contribution ratings were flagged for verification and moderation in the field. Field visit instructions were prepared in advance of visits to each London borough detailing the features to verify and photograph (where access and views permitted). Common features field assessors were asked to photograph and feedback thoughts on included:

- Features within and at the edges of parcels influencing a parcel's relationship with neighbouring urbanising influences, including settlements.
- Features within and at the edges of parcels influencing a parcel's relationship with the wider countryside.
- The visibility of urbanising influences within parcels and their affect on the visual and spatial openness of the Green Belt.
- Intervisibility between neighbouring towns and/or perceived visual, physical, or experiential relationships with historic town.

2.25 All Green Belt parcel boundaries and ratings were reviewed and moderated by the study project manager prior to any field visits being undertaken. Following all field visits, the project manager undertook detailed consistency checks within each London borough and across borough boundaries to ensure key Green Belt terms and illustrative features had been robustly and consistently considered and reported on.

NPPF footnote 7 areas and assets

2.26 The Government's definition of grey belt land 'excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.' The PPG states in such locations, it may be necessary to only 'provisionally identify such land as grey belt in advance of more detailed specific proposals' (PPG Paragraph: 006 Reference ID: 64-006-20250225).

2.27 Footnote 7 states 'The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites **[See reference** 2**]** (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape,

a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets **[See reference 3]** (and other heritage assets of archaeological interest referred to in footnote 75 **[See reference 4]**); and areas at risk of flooding or coastal change.' This is considered to cover the following, many of which may not be contained within or relevant to the assessment area:

- Sites of Community Importance;
- Special Areas of Conservation (SAC) – include possible SACs;
- Special Protection Areas (SPA) – including potential SPAs;
- RAMSAR sites – including proposed RAMSAR sites;
- Sites of Special Scientific Interest (SSSI);
- Sites identified, or required, as compensatory measures for adverse effects on habitats sites;
- Marine Conservation Zones;
- Irreplaceable habitats **[See reference 5]**;
- World Heritage Sites;
- Scheduled Monuments;
- Registered Parks and Gardens;
- Registered Battlefield;
- Conservation Areas;
- Listed Buildings;
- Local Green Space;
- National Landscape;
- National Park (or Broads);
- Heritage Coast;
- Tier 1 Archaeological Priority Areas;
- Flood risk areas – including Flood Zones 2 and 3, surface water and ground water flood risk areas; and,
- Coastal Change Management Areas.

2.28 In light of the PPG, these areas and assets are not excluded from assessment, but their location and extent are mapped alongside the findings of the Green Belt contribution assessment. Green Belt land that does not contribute strongly to Green Belt purposes A, B and D is only 'provisionally' identified as potential grey belt land. This strategic assessment makes no attempt to conclude on whether the presence of any NPPF footnote 7 areas or assets would preclude grey belt status. For instance, judgements about whether policies covering designated ecological, historic, landscape or flood risk assets provide a strong reason for refusing or restricting development, including impacts on the settings of designated heritage assets within or close to the Green Belt, have not been made as part of this assessment. Further detailed work would need to be undertaken by local planning authorities (as necessary through the plan-making and development management processes) to establish the effects of more detailed specific proposals on them, including land within their vicinity that may also have the potential to have significant impacts on them in certain circumstances.

2.29 GIS data on listed buildings (a designated heritage asset) is only available as point data. There is no consistent and accurate GIS data available marking the extent of the setting of such assets across Greater London or immediately beyond its boundaries. In the absence of consistent and readily available area-based data sets for these assets, GIS point data is instead mapped in the commissioning borough Green Belt parcel assessment proforma to draw attention to their location within assessed Green Belt locations, highlighting the need for further detailed work by relevant specialists (as appropriate through the plan-making and development management processes) to establish the effects on these assets.

2.30 Mapped areas at risk of flooding are confined to Flood Zones 2 and 3 and high risk surface water flooding areas on the basis that groundwater flooding outside of these flood zones are not mapped to a sufficiently granular and consistent scale across the study area to be useful to the definition of grey belt land at a strategic scale.

2.31 Again, the impact of prospective development sites on listed buildings or their setting, ancient and veteran trees and additional areas of surface water or groundwater flooding (outside of flood zones 2 and 3) will be considered in greater detail at a later stage through site allocation and/or development management processes. This will likely require the involvement of specialists, such as historic environment officers, ecologists or flood risk specialists.

2.32 In response to consultation to the study methodology, the Environment Agency recommended that six additional habitats (Spartina Saltmarsh Swards, Mediterranean Saltmarsh Scrub, Limestone Pavements, Seagrass, Peaty Soils and

Chalk Rivers) be categorised as 'irreplaceable habitats' alongside the official list maintained by Defra. The full list of defined irreplaceable habitats is:

- saltmarshes;
- ancient and veteran trees;
- ancient woodland;
- blanket bog;
- limestone pavements;
- coastal sand dunes;
- lowland fens;
- peaty soils;
- chalk rivers; and,
- seagrass.

2.33 All saltmarshes have been mapped as potential irreplaceable habitats in acknowledgement that any of these habitats may support spartina saltmarsh swards and saltmarsh scrub. It was not possible to map ancient and veteran tree (a designated irreplaceable habitats) point data in the commission borough Green Belt parcel assessment proforma. This data is owned by the Woodland Trust and was too costly to obtain for the entirety of Greater London in this study.

2.34 Figures B.2 and B.3 in **Appendix B** illustrate the NPPF footnote 7 designations identified to date within Greater London. They are shown on two separate maps to ease readability.

Previously developed land

2.35 The NPPF defines grey belt 'as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.' The definition makes it clear that only previously developed land (PDL) that does not make a strong contribution to the Green Belt purposes can be defined as grey belt land, i.e. that PDL in isolation is insufficient justification to define Green Belt land as grey belt. This is supported by recent appeal decisions directly relevant to the matter **[See reference 6]**. The presence of PDL may still be helpful in the site selection process when applying the sequential test for meeting development needs through Green Belt release set out in paragraph 148 of the NPPF.

2.36 The NPPF glossary defines previously developed land (PDL) as 'Land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed). It also includes land comprising large areas of fixed surface infrastructure such as large areas of hardstanding which have been lawfully developed. Previously developed land excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'

2.37 Given the 5ha minimum parcel size discussed in the section titled 'Minimum parcel size' above, this strategic assessment does not identify many examples of parcels that are wholly developed. The majority of significant (=/>5ha) activities and land uses that qualify for definition as PDL will likely be defined as making less than a strong contribution to Green Belt purposes A, B and D (by virtue of their urbanising influence and/or effect on the openness of the Green Belt) and will therefore fall within defined grey belt locations through the strategic assessment process. Some PDL such as large areas of fixed surface infrastructure may in certain locations maintain a strong sense of openness such that they make a strong contribution to Green Belt purposes A, B or D and are not eligible for definition as grey belt land.

2.38 Although areas of development at a scale less than 5ha in area are not identified as parcels through this strategic assessment, their presence and influence on Green Belt contribution is considered in the rating of parcels. More detailed Green Belt assessments of smaller areas of land in locations being considered for allocation through the plan-making process and/or development through the planning application process may be undertaken at a later date. These more detailed assessments, focussed on specific development proposals, offer greater scope to consider whether development and other urbanising influences within the Green Belt meet the PDL definition or not. Notable detailed considerations might include whether land is within the curtilage of a building, whether land is within a 'built-up area' (different to the Green Belt definition of large built-up area), whether any relevant development is 'lawful', whether land has been remediated and to what extent, or whether development has 'blended' into the landscape.

2.39 It is an accepted matter of case law **[See reference 7]** that decision-makers should take into account different parts of sites in deciding whether land is PDL or not.

2.40 New buildings are generally inappropriate in the Green Belt. There are exceptions to this which are set out in a closed list in paragraph 154 of the NPPF. **Appendix B** outlines these exceptions, and the sections titled 'Free of existing development' in **Chapter 2** below, outline their relevance to the assessment of Green Belt contribution.

Assessment of Green Belt contribution and definition of grey belt land

2.41 Working outwards from settlement's urban edges, the analysis process identified variations in the relationship between urban and open Green Belt land, using lines to mark variations in the relevance of each Green Belt purpose and the strength of Green Belt land's relationship with urban areas and the open countryside. These lines were then be used to define parcels that each made a consistent level of contribution to the Green Belt purposes.

2.42 The paragraphs below identify the factors relevant to the assessment of each of the Green Belt purposes and detail the assessment outputs specific to each purpose in line with national planning policy, practice guidance and case law.

2.43 In assessing the impact of release and development, in the absence of the consideration of specific development proposals in this study it is assumed that development would be of a similar average scale and density to the existing urban areas in the vicinity, and that current boundary features would generally remain.

Purpose A – to check the unrestricted sprawl of large built-up areas

Grey belt PPG for Purpose A

2.44 The following features in combination are identified as being illustrative of a '**strong'** contribution:

- Free of existing development.
- Proximity to a large built-up area.
- Lack physical features in reasonable proximity that could restrict and contain development.

- A location which, if developed, would form an incongruous pattern in relation to the large built-up area.

2.45 The presence of one or more of the following features, in addition to being near to a large built-up area, is identified as being illustrative of a '**moderate'** contribution to Purpose A:

- Presence of, or containment by, development such that any new development would not result in an incongruous pattern of development.
- Being subject to other urbanising influences.
- Having physical feature(s) in reasonable proximity that could restrict and contain development.

2.46 Either lack of proximity to a large built-up area or the presence of, or containment by, significant existing development, is identified as being illustrative of a '**weak/no'** contribution to Purpose A.

Purpose A definitions

2.47 The PPG uses several terms that require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

'Large built-up area'

2.48 The PPG states that 'villages should not be considered large built-up areas' (PPG Paragraph: 005 Reference ID: 64-005-20250225). The implication of this is that towns and cities are large built-up areas.

2.49 The London metropolitan Green Belt was created to prevent the sprawl of Greater London. Therefore, for the purpose of this study all urban areas contiguous with the Greater London conurbation are defined as part of the large built-up area. In addition, all separate towns defined in the Purpose B definitions section below are also considered to be large built-up areas of relevance to Purpose A.

'Near to'

2.50 Purpose A is relevant to land that is 'adjacent or near to' a large built-up area. The extent to which land in the vicinity of a large built-up area relates to it is a question of judgement based on a range of factors including:

- Distance proportional to the size and proximity of large built-up areas.

- Features that create a sense of physical and/or visual separation.
- Features that weaken the sense of separation through physical and/or visual connection.
- Urbanising development and activity within the Green Belt.

2.51 Although villages are not large built-up areas, villages that lack significant separation from, or are relatively close to a large built-up area as a result of one or more of the factors outlined above are considered to be near to a large built-up area.

2.52 The point beyond which Green Belt land is not considered to be near to any large built up area is where development, whether it be the expansion of existing villages or the creation of new settlements would be sufficiently distinct from large built-up area as to not be perceived as sprawl from them.

2.53 All Green Belt land within Greater London is considered to be near to the Greater London conurbation or smaller satellite large built-up areas, primarily by virtue of the relatively limited extent of the Green Belt area in Greater London relative to the scale of the Greater London conurbation. In addition, a significant proportion of Greater London's Green Belt land is either physically or visually connected to the urban area via the local transport network and/or urban and suburban activity and land use.

'Free of existing development'

2.54 'Existing development' is not considered to include the appropriate development 'exceptions' listed in NPPF paragraph 154, such as agricultural buildings, which case law **[See reference 8]** generally considers does not affect the openness of the Green Belt. Paragraph 160 of the NPPF states 'elements of many renewable energy projects will comprise inappropriate development'; however, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore will not be judged as existing development affecting contribution to the Green Belt purposes in perpetuity.

2.55 'Free of' is not considered to mean 'no existing inappropriate development'. The influence of existing inappropriate development is judged on the basis of a combination of an area's visual and spatial openness.

‘Physical features in reasonable proximity...that could restrict and contain development’

2.56 Many features could be considered to define the edge of a developed area, including features created in association with new development, but the concept of ‘restricting’ and ‘containing’ development is considered to relate to the extent to which new development would be prevented from having an urbanising influence on land immediately beyond by intervening physical features. Urbanising influence (defined under the header ‘other urbanising influences’ directly below) is one of the factors identified in the PPG as being indicative of a ‘moderate’ contribution to Purpose A. If adjacent land that currently makes a ‘strong’ contribution to Purpose A would, as a result of increased urbanising influence, make a weaker contribution, such that it became grey belt, then physical features would not be deemed to ‘restrict and contain’ development.

2.57 For the purposes of a strategic assessment of existing Green Belt land, this judgement is based on existing physical features in reasonable proximity of existing urban areas, without consideration of potential strengthening of boundaries that could be associated with particular development proposals. Physical features that restrict and contain development would typically be:

- strong natural landscape elements such as woodlands or changes in topography, which limit views or create a stronger sense of separation between urban and open land; or
- natural or manmade features that present a physical barrier to movement, and which have some visual screening role, such as tree-lined rivers or canals, motorways and railway lines with embankments, or main roads with strong boundary vegetation.

2.58 Such features are not considered to restrict and contain development if they emanate out from a large built-up area.

2.59 As assessment parcels are defined to reflect variations in contribution to the Green Belt purposes, physical features that restrict and contain development are typically parcel boundaries or form a significant proportion of parcels. Where this is the case, they are generally judged to be in reasonable proximity. Physical features that are a significant distance away will generally not be judged to be in reasonable proximity.

‘Enclosed by existing development’ (‘partially’ or ‘largely’)

2.60 The extent to which land can be considered to be enclosed by development is a judgement that depends on the strength of the existing development’s urbanising influence on neighbouring Green Belt land and the strength of the neighbouring Green Belt land’s physical and/or visual relationship with the wider countryside. The greater the proportion of a defined Green Belt area’s boundary that adjoins urban development (whether that is inset from the Green Belt or washed-over by it) the greater its enclosure. Strong urban edge boundary features that limit urbanising influence can limit a sense of enclosure or containment by adjoining development, as long as there is some sense of connectivity with the wider countryside. Conversely, a lack of physical and visual connectivity with the wider countryside can increase the sense of enclosure, even if urban development around a Green Belt area is not strongly visible.

‘Other urbanising influences’

2.61 Separate to the consideration of existing development within the Green Belt, ‘other urbanising influences’ could be land use or activity without development that is generally associated with urban areas, or it could be an urbanising influence from adjacent development, either inset within the Green Belt or outside but adjacent to Green Belt land.

2.62 The PPG refers to activity in the Green Belt, such as traffic generation, having an impact on openness. In some cases, there may be land uses that, although appropriate and not therefore affecting openness, still have an association with the urban area that constitutes a degree of urbanising influence. Notable examples could include sport and recreational playing fields or ‘large areas of fixed surface infrastructure such as large areas of hardstanding [that have not blended into the landscape]’, the latter of which is defined in the NPPF as PDL.

2.63 The urbanising influence of renewable energy and power infrastructure will be judged on a case by case basis based on their permanence and scale of fixed surface infrastructure, such as large areas of hardstanding, associated with them. For example, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore are not judged as notable urbanising influences affecting contribution to the Green Belt purposes in perpetuity, whereas permanent substations set on fixed surface infrastructure, do affect the contribution to the Green Belt purposes over the long term.

2.64 The strength of urbanising influence associated with such areas depend on a number of factors, including the presence or lack of intervening physical boundary features, the scale/visibility of development in the associated urban area, landform change, distance from the existing urban edge and strength of relationship with the wider countryside.

‘An incongruous pattern of development’

2.65 The PPG cites an extended ‘finger’ of development into the Green Belt as an example of an incongruous pattern of development. Where parcels are defined to reflect variations in contribution to the Green Belt purposes they are only likely to have a finger-like form where they follow existing urban development, so this scenario would more typically relate to the assessment of specific new development proposals. However, where smaller ‘satellite’ settlements around large built-up areas lie close enough together to be at risk of merging were development to reduce separation between them, significant loss of separation in such a gap, could in effect lead to the satellite settlement becoming an extended finger of the large built-up area. Similarly, any breaching of a significant existing physical feature, or a significant combination of adjacent physical features, that currently serve to restrict and contain the existing large built-up area, also form an incongruous pattern of development. Examples of this sort of step-change in settlement form include development crossing a major retaining and containing road, railway or river, or extending out from a valley onto a hilltop into open Green Belt land that does not relate well to existing development.

Purpose B – to prevent neighbouring towns merging into one another

Grey belt PPG for Purpose B

2.66 The following features in combination are identified as being illustrative of a ‘**strong’** contribution:

- Land forming a substantial part of a gap between towns.
- Free of existing development.
- Development would result in the loss of visual separation of towns.

2.67 The presence of one or more of the following features in a gap between towns is identified as being illustrative of a ‘**moderate’** contribution to Purpose B:

- Land forming a small part of a gap between towns.
- Development would not result in the loss of visual separation of towns, for example due to the close proximity of structures, natural landscape elements or topography that preserve visual separation.

2.68 Green Belt land that does not have a relationship with a gap between towns or forms only a very small part of a gap between towns, such that it makes no contribution to visual separation, is identified as being illustrative of a '**weak/no'** contribution to Purpose B.

Purpose B definitions

2.69 The PPG uses several terms which require further definition to be applied as part of the assessment process for Purpose B. These are addressed in the paragraphs below.

'Town'

2.70 The PPG states that 'this purpose relates to the merging of towns, not villages' (PPG Paragraph: 005 Reference ID: 64-005-20250225).

2.71 The Greater London conurbation is defined as a large built-up area of relevance to the assessment of Purpose A; however it is also necessary to define towns within it which, although merged in the wider conurbation, may be physically separated by some open Green Belt land such that a gap separating neighbouring towns remains. Where no notable Green Belt land lies between definable towns, the urban edge of the Greater London conurbation is considered to represent the urban edge of Greater London's nearest towns.

2.72 Annex 1 of the adopted London Plan (2021) classifies Greater London's 'larger town centres into five categories: International, Metropolitan, Major and District centres.' This Annex 1 list has been used as an initial consistent reference point for establishing which urban areas within Greater London are generally described as towns. Named international, metropolitan, major and district centres, including 'unclassified centres with potential for classification as towns' are noted. Annex 1 also lists Central Activity Zone (CAZ) retail centres, but their central locations mean none lie in close proximity to Green Belt land.

2.73 In addition, all relevant London Borough Local Plan settlement hierarchies outlined in standalone evidence and/or adopted Local Plans have been reviewed to supplement and refine the list of towns referenced in Annex 1 of the London Plan.

Local Plan settlement hierarchies have also been used to define relevant towns in neighbouring local authority areas.

2.74 Where there are standalone settlements that have the potential to be borderline cases, either by virtue of their size or local reputation, and there is no clear justification in Local Plan settlement hierarchies, the following definitions of a 'small town' and a village/ smaller community is used – as derived from the House of Commons Library, City & Town Classification of Constituencies & Local Authorities briefing note (2018) **[See reference 9]**:

- 'Small Towns: settlements with a population between 7,500 and 24,999', i.e. all borderline standalone settlements with a population =/> 7,500 are be defined as 'towns'.
- 'Village and smaller communities': settlements with smaller populations <7,500 are not be defined as towns.

2.75 The briefing note states that 'This classification isn't intended to resolve long-standing disputes about which settlements deserve to be called 'cities', 'towns', or 'villages'; however, in absence of a Government definition, it represents a suitably objective and consistent benchmark against which to make a final decision for the purposes of this assessment. The Office for National Statistic's 2021 Census data has been used to establish populations of these settlements where necessary.

2.76 In some locations, smaller urban areas may lack sufficient separation from a town to be considered separate from it in Green Belt terms and sometimes act as connecting urban areas in the remnants of Green Belt gaps between towns. The influence of smaller urban areas on gaps between towns is explored further under the definition of 'a substantial part of a gap' below.

2.77 Appendix A identifies the towns, and the Green Belt gaps between them, within each London Borough containing Green Belt land. Participating London boroughs were asked to review the towns listed prior to the assessment being carried out.

'A substantial part of a gap'

2.78 Whether part of a gap can be described as substantial is a function not just of its relative size to a gap as a whole but also the physical features in it. Some 'separating' physical features, such as woodlands, landform features, major roads, railways and rivers strengthen perceived separation, particularly where they contribute to visual separation. Roads and railways can also be 'connecting' features

that strengthen the link between towns, reducing the time taken to pass through a gap and weakening the role of visual separators.

2.79 Smaller urban areas – villages and hamlets, industrial, educational and retail estates – between towns can be physically and visually connecting features. Towns may be some distance apart but, due to the presence of such smaller urban areas between them, intervening open Green Belt land may be judged more important to maintaining visual separation than distance alone might suggest.

2.80 A parcel contributes more to the 'substance' of a gap between towns if it contains key separating physical features, and the more fragile a gap the smaller a part of a gap might be to be considered substantial.

2.81 The fragility of a gap is a key consideration to establish what is and is not substantial within or adjacent to a gap between neighbouring towns. Gap fragility is judged based on a combination of factors including the relative size of the gap and/or the presence/absence of connecting and separating features:

- A robust gap is typically be relatively wide and contain significant physical features that maintain visual separation.
- A moderate gap is relatively wide but lack significant physical features that maintain visual separation or be relatively narrow but contain physical features that maintain visual separation.
- A fragile gap is typically be relatively narrow and lack physical features that maintain visual separation.

2.82 Green Belt land can play a peripheral role and therefore make a more limited contribution to a gap between towns where it does not lie directly in a gap but its development would weaken Green Belt land in a gap. Green Belt land on the periphery of fragile gaps may still be judged to be a substantial part of it. Green Belt land within a gap may also to an extent be considered peripheral if the neighbouring towns in question are already to a significant extent connected by development.

2.83 Development expanding a town out into the core of a gap, removing a relatively large part of it, would clearly represent a substantial impact, but such scenarios would generally be captured as making a 'strong' contribution to Purpose A (and therefore not be eligible for definition as grey belt) as a consequence of a likely resulting incongruous pattern of development.

2.84 Relatively wide gaps between towns generally have scope for some new development within them without significant loss of visual separation between neighbouring towns. Consequently, large parcels within or on the periphery of

relatively wide gaps that only represent 'a substantial part of a gap' between towns by virtue of their size are generally rated as making a 'moderate' contribution to Purpose B, in acknowledgement of their potential to accommodate development in smaller parts of them without loss of visual separation of towns. In this way the assessment findings help point to areas of search where there could be potential (in Green Belt terms) for development, including new settlements, in gaps between neighbouring towns.

A 'small' or 'very small' part of a gap'

2.85 'A small part of a gap' is judged to be an 'insubstantial' part of it – that is, land in a gap that does not meet the 'substantial' definition above – but one that still provides a degree of visual separation.

2.86 A 'very small' part of a gap is an area that does not contribute to visual separation, generally as a result of their existing development and/or containment and significant urbanisation. These areas generally also make a weak/no contribution to Purpose A.

'Loss of visual separation'

2.87 'Loss' is interpreted as a 'significant reduction' in visual separation, rather than its complete removal. Typically the development of a substantial part of a gap has the potential to equate to a significant loss of visual separation although, as noted in the section above, relatively wide gaps between towns could accommodate some degree of new development, isolated from any town, without a significant loss of visual separation, i.e. no more than a minor reduction in visual separation. Negligible reductions in visual separation are likely to be limited to areas already containing existing development and/or are contained and significantly urbanised by urban areas.

'Free of existing development'

2.88 'Existing development' is not considered to include the appropriate development 'exceptions' listed in NPPF paragraph 154, such as agricultural buildings, which case law **[See reference** 10**]** generally considers does not affect the openness of the Green Belt. Paragraph 160 of the NPPF states 'elements of many renewable energy projects will comprise inappropriate development'; however, renewable energy and power infrastructure permitted for temporary periods of time (often in the open countryside) are not permanent and therefore are not be judged as existing development affecting contribution to the Green Belt purposes in perpetuity.

2.89 ‘Free of’ is not considered to mean ‘no existing inappropriate development’. The influence of existing inappropriate development is judged on the basis of a combination of an area’s visual and spatial openness.

Purpose C – to protect the countryside from encroachment

2.90 Purpose C is not relevant to the identification of grey belt and is not referenced in the PPG, but it is still one of the five purposes of Green Belt set out in the NPPF. Ratings of contribution to Purpose C could still help inform judgements regarding which grey belt areas are more suitable for release than others in Green Belt terms. In addition, if the release and/or development of Green Belt land outside of defined grey belt areas needs to be considered, contribution ratings for Purpose C will likely be an important consideration. For example, in locations not near to and remote from towns and cities, variations in contribution to Purpose C will likely provide the only source of comparison in the contribution of Green Belt land to the Green Belt purposes.

Purpose C definitions

2.91 Purpose C is assessed by determining the extent to which a location can be considered part of the countryside, the level of urbanising influence affecting it and whether or not development in the parcel would significantly increase urbanising influence on adjacent open land.

‘Part of the countryside’

2.92 Green Belt land is part of the countryside where it is open and has a clear connection with the wider open countryside. Physical isolation from the wider countryside, uses which create a strong association with an urban area, or the presence of existing urban development can affect what is judged to be countryside in Green Belt terms. This is not a judgement that considers the scenic beauty, ecological value or condition of land.

‘Urbanising influence’

2.93 This is defined as a combination of both the influences of ‘existing development’ and ‘other urbanising influences’ (both defined under Purpose A above). This includes urbanising development washed over by, inset within or directly adjacent to

the outer edges of Green Belts, such as villages and hamlets, industrial, educational and/or retail estates.

2.94 Relevant factors influencing the significance of urbanising influence include separating/screening physical boundary features, the scale/visibility of urbanising development and associated land uses and activity, landform change, distance from the urban areas, and the strength of relationship with the wider countryside.

Purpose C assessment ratings

2.95 The following features in combination are identified as being illustrative of a '**strong'** contribution:

- Land is part of the countryside with limited urbanising influences or contains open land uses associated with urban areas with limited urbanising influences.
- A lack of features to restrict and contain development, such that were development to take place, there would be a stronger urbanising impact on adjacent Green Belt land than is currently the case.

2.96 The presence of one or more of the following features are identified as being illustrative of a '**moderate'** contribution:

- Land may contain open land uses associated with urban areas with some urbanising influence.
- Notable pockets but not significant urbanising influence.
- The presence of features to restrict and contain development, such that were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.

2.97 The following features in combination are identified as being illustrative of a '**weak/no'** contribution:

- Land is wholly or largely contained from the wider countryside by development, or openness is significantly limited by existing development.
- Significant urbanising influence.
- Were development to take place, there would be no stronger urbanising impact on adjacent Green Belt land.

Purpose D – to preserve the setting and special character of historic towns

Grey belt PPG for Purpose D

2.98 The following features in combination are identified as being illustrative of a '**strong'** contribution to Purpose D:

- Free of existing development.
- Form part of the setting of a historic town.
- Land makes a considerable contribution to a historic town's special character – being within, adjacent, or of significant visual importance to historic aspects.

2.99 The presence of one or more of the following features, in addition to being part of the setting and/or contributing to the special character of a historic town, is identified as being illustrative of a '**moderate'** contribution to Purpose D:

- Containing existing development.
- Separated from historic aspects of the town by existing development or topography.
- No important visual, physical, or experiential relationship to historic aspects of a town.

2.100 Land that does not form part of the setting of a historic town, with no visual, physical, or experiential connection to the historic aspects of a town is illustrative of a '**weak/no'** contribution to Purpose D.

Purpose D definitions

2.101 The PPG uses several terms that require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

'Historic town'

2.102 The PPG is clear that this purpose relates to historic towns, not villages (PPG Paragraph: 005 Reference ID: 64-005-20250225). An extract from Hansard in 1988 clarified which historic settlements in England were certainly considered 'historic towns' in the context of the Green Belt purposes. The Secretary of State for the Environment clarified in answer to a parliamentary question that the purpose of

preserving the special character of historic towns is especially relevant to the Green Belts of York, Chester, Bath, Oxford and Cambridge **[See reference** 11**]**. Durham has since been added to this list.

2.103 It has been LUC's experience through consultation with Historic England on several Green Belt study method statements, that Historic England do not consider the list on towns quoted in Parliament to necessarily be exclusive. Therefore the settlements referenced under the definitions of 'large built-up area' (see section titled Purpose A definitions) and 'town' (see section titled Purpose B definitions) above all have the potential to be defined as 'historic towns' relevant to the assessment of Purpose D, subject to the definition of their historic settings or special character. Participating London boroughs were asked to review the towns listed prior to the assessment being carried out.

'Setting and special character'

2.104 The extent to which the Green Belt contributes to the setting and special character of a historic town is related to the visual, physical and/or experiential relationship between Green Belt land and historic aspects of a town.

2.105 What forms part of a historic towns setting and/or contributes to the special character of a historic town is a matter of professional judgement that cannot be defined in general terms. It is unique to each historic town's character, townscape and connections to the wider landscape.

2.106 The connection between a historic town's historic character and the wider countryside does not have to be physical; indeed, successive waves of development often isolate core historic areas from the surrounding countryside, meaning it is often more a visual connection. This visual connection can be defined through movement through the area, or views into or out of the settlement.

'Historic aspects'

2.107 In order to establish the relevance of Green Belt land to historic aspects of a historic town it is necessary to review and research each historic town's historic aspects in turn. This has been done with reference to historic environment evidence for each historic town available at the time of the assessment, such as historic town setting studies and conservation area appraisals.

2.108 Recorded references to the open countryside or key physical features and/or landmarks in the Green Belt are useful in judging and justifying the appropriate level

of contribution relevant Green Belt land makes to a historic town's setting and special character.

2.109 Many historic towns have historic aspects that have little to no relationship with their setting and special character, and many historic towns contain historic areas focused on historic buildings and spaces within towns, with any views of the Green Belt countryside being incidental rather than part of the historic town's setting and special character. Where this is the case, contribution to Purpose D can often be ruled out, noting that this does not mean such places do not have special and unique characteristics worthy of preservation, just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D.

'Free of existing development'

2.110 'Free of existing development' is defined under Purpose A and B above. The same definition applies to Purpose D.

Purpose E – to assist in urban regeneration

2.111 Purpose E is not relevant to the identification of grey belt and is not referenced in the PPG, but it is one of the five purposes of Green Belt set out in the NPPF.

2.112 Most Green Belt studies do not assess individual Green Belt land parcels against Purpose E, and either do not rate them or rate them all equally, on the grounds that outside the definition of PDL, it is difficult to justify why the release and/or development of one area of Green Belt land has a greater impact on encouraging re-use of urban land than another. This is supported by planning inspector's judgements on the matter, such as the inspector's report re: the London Borough of Redbridge's Local Plan (January 2018), which noted that with regards to Purpose E 'this purpose applies to most land' but that 'it does not form a particularly useful means of evaluating sites' **[See reference** 12**].**

2.113 More generally regarding plan-making, paragraph 147 of the NPPF states that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development [including] a) makes as much use as possible of suitable brownfield sites and underutilised land and b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other

locations well served by public transport'. In other words, Purpose E must have already been followed before options in the Green Belt are considered further.

2.114 Using evidence to inform meaningful judgements on the collective contribution Green Belt land makes to Purpose E is also difficult. In the absence of any clear guidance on what percentage of recorded brownfield land enables a Green Belt to play a stronger or more limited role in encouraging urban regeneration, a uniform level of 'moderate' contribution to Purpose E is applied to all areas of Green Belt in the study area.

Fundamental impacts to remaining Green Belt land

2.115 Green Belt assessments must also consider the extent to which release or development of Green Belt land (including but not limited to grey belt land) would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole. The PPG states that this judgement should focus on evaluating the effect of release or development on 'the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way'.

2.116 What is fundamental and meaningful could vary significantly based on the scale and nature of the plan area and the range, significance and extent of contribution Green Belt land makes to the Green Belt purposes within it.

2.117 The PPG uses a few terms which require further definition to be applied as part of the assessment process. These are addressed in the paragraphs below.

'Plan area'

2.118 With regards to the London Plan area of Greater London as a whole, it is reasonable to conclude that no combination of proposals within a single London borough are capable of fundamentally undermining the purposes (taken together) of the remaining Green Belt across Greater London as a whole. No single London borough includes a significant enough development need and proportion of the whole Greater London's Green Belt land for this to be a reasonable scenario. In addition, it is the role of the individual London Boroughs, as local planning authorities, to justify, make and formalise any adjustments to Green Belt boundaries via planning decisions through the preparation or updating of their Local Plans. Therefore, judgements relating to fundamental and meaningful impacts on remaining Green Belt are confined to individual Local Plan areas at the borough level.

‘Purposes (taken together)’

2.119 Most Green Belt land does not contribute to all Green Belt purposes to the same degree, with large areas of Green Belt land not contributing or contributing weakly to multiple purposes. Consequently, what constitutes a fundamental and meaningful impact varies from plan area to plan area depending on which purposes are important. Release or development that fundamentally and meaningfully impacts Green Belt land contributing to one Green Belt purpose would in effect affect its ability to serve the purposes (taken together) in a meaningful way.

‘Fundamental’ and ‘meaningful’

2.120 Some proposals may only fundamentally undermine the ability of the remaining Green Belt land in a plan area to serve a single important purpose to have a meaningful impact. Other proposals may undermine multiple purposes to a degree that in combination their impact is meaningful.

2.121 The scale and contiguity of Green Belt land within a borough may also play a role in what is meaningful. Release or development of smaller areas of Green Belt land are likely to be more meaningful in boroughs with smaller areas of Green Belt land. Release or development of pockets of Green Belt land that are isolated from the wider designation within urban areas are less likely to have a meaningful impact.

2.122 A fundamental and meaningful impact on Purpose A (to check the unrestricted sprawl of large built-up areas) in an individual borough context may include but is not limited to where release or development of land would result in the physical or perceived merging of a large built-up area with an adjacent satellite settlement such that the adjacent settlement would be perceived to be part of a larger ‘sprawling’ large built-up area. How fundamental and meaningful the loss of a such a gap would be is dependent on its current contribution to Purpose A. Most sprawl of a large built-up area will not fundamentally undermine the ability of remaining Green Belt land to continue to fulfil this function.

2.123 A fundamental and meaningful impact on Purpose B (to prevent neighbouring towns from merging into one another) in an individual borough context may include but is not limited to release or development that would result in the physical or perceived merging of two currently distinctly separate neighbouring towns, or where release or development would result in the loss of the most substantial part of a gap separating neighbouring towns such that it no longer played a meaningful role in relation to Purpose B. Whether the merging of two neighbouring towns is meaningful in a borough context may also be influenced by the number of neighbouring towns that could remain distinctly separate by remaining Green Belt land.

2.124 A fundamental and meaningful impact on Purpose C (to assist in safeguarding the countryside from encroachment) in an individual borough context may include where release or development would fundamentally and meaningfully undermine the countryside in the remaining Green Belt land within the plan area. For example, where release or development would sever and isolate substantial areas of the remaining Green Belt land contributing strongly to Green Belt Purpose C from the wider countryside. Most encroachment of the countryside will not fundamentally undermine the ability of remaining Green Belt land to continue to fulfil a countryside function.

2.125 A fundamental and meaningful impact on Purpose D (to preserve the setting and special character of historic towns) in an individual borough context may include but is not limited to the release or development of an important or very important part of the setting of a historic town, integral to its special character.

2.126 A fundamental and meaningful impact on Purpose E (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land) is not considered likely given that other Green Belt policy prioritise the use of non-Green Belt locations first followed by previous developed land in the Green Belt, i.e. it is unlikely that Green Belt release or development could be justified having not already demonstrated that this purpose has not been fundamentally and meaningfully undermined.

Fundamental impact outputs

2.127 Without a clear understanding of the location of release or development, its scale and land use, including what Green Belt land would remain within a plan area, it is not possible to make a definitive judgement on fundamental impact. In the absence of specific proposals, the variations in contribution to each Green Belt purpose identified in this assessment highlight the areas where Green Belt contribution is at its greatest within each London borough's Local Plan area. These areas of highest contribution in a borough are then reviewed in the round to judge where release or development could fundamentally and meaningfully undermine the purposes in the borough. These judgements are justified at the borough-level in each report.

2.128 Once each London borough is in a position to evaluate specific proposals for Green Belt release or development, it will be possible to make a definitive judgement as to whether they would (individually or cumulatively) fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.

London-wide assessment outputs

2.129 A series of overview maps have been prepared to illustrate the variations in contribution to each purpose. Each map is accompanied by summary justification text to explain the factors influencing the patterns and variations in Green Belt contribution to each purpose. In addition, two additional 'overview' maps have been prepared illustrating:

- Areas potentially suitable for definition as 'grey belt', i.e. Green Belt land judged not to perform strongly to Green Belt purposes A, B and D and outside the defined footnote 7 areas and assets. Footnote 7 areas and assets that overlap with areas otherwise suitable for definition as grey belt land are provisionally defined as potential grey belt subject to further detailed assessment.
- Areas of strongest contribution, including the number of strong contribution ratings to the purposes (where there is more than one).

Commissioning London borough assessment outputs

2.130 The commissioning London boroughs have received a similarly structured version of the London-wide assessment of contribution assessment report that focusses exclusively on the contribution assessment findings within their borough, including borough-level overview maps and summary justification text. The commissioning borough reports include more detail than this London-wide report, including:

- The option of defining 'very strong' contribution areas within the London-wide 'strong' contribution areas for each Green Belt purpose.
- Individual parcel proforma reports justifying the assessment findings for each defined parcel in the borough.

2.131 The detailed proforma reports contain aerial and OS mapping and a description of each parcel's location, landform, land use and boundaries. The contribution ratings assigned for each Green Belt purpose are justified with reference to the relevance of each Green Belt purpose in each location, the presence of existing development, the influence of urban areas and other urbanising influences, the influence of physical features and the potential for impacts on the contribution of wider Green Belt land.

Potential further work

2.132 Once completed, the study will be used by the GLA and commissioning boroughs' alongside other pieces of evidence to shape Green Belt and other planning policies. Further detailed Green Belt assessment work may be required to inform this process.

2.133 If the necessary exceptional circumstances for making alterations to the Green Belt are identified, consideration may then be given to:

- Defining grey belt land at a more granular level, including the exclusion of land where the application of the policies relating to the areas or assets in NPPF footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.
- Assessing whether preferred or final releases would in combination fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the Local Plan area – i.e. the cumulative effect of any proposed allocations on the designation.
- Defining defensible boundaries for the masterplans associated with allocated sites and safeguarded land.
- Identifying opportunities within and around proposed releases and developments to minimise the harm to the wider Green Belt designation.

Chapter 3
Borough Findings

3.1 This chapter summarises the findings of the assessment of the Green Belt land within each of the London boroughs, outlines the location and extent of Green Belt land that potentially meets the definition of grey belt land and points to where release or development could fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.

Potential grey belt land

3.2 'Grey belt' is defined in Annex 2 of the NPPF as 'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.'

3.3 Only previously developed land (PDL) that does not make a strong contribution to the Green Belt purposes can be defined as grey belt land, i.e. not all PDL is relevant to the definition of grey belt land in this study. The majority of significant (=/>5ha) activities and land uses that qualify for definition as PDL will likely be defined as making less than a strong contribution to Green Belt purposes A, B and D (by virtue of their urbanising influence and/or effect on the openness of the Green Belt) and will therefore fall within defined grey belt locations through the strategic assessment process.

3.4 Purposes C and E are not relevant to the identification of grey belt. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development'.

3.5 A figure is included for each London borough that illustrates the area potentially suitable for definition as grey belt land within the plan area. The figures also map the extent of the present NPPF footnote 7 areas and assets. Areas potentially suitable for definition as grey belt land that overlap with the NPPF footnote 7 areas and assets are only provisionally defined as potential grey belt land until such time that further detailed work can be undertaken (as necessary) to establish whether specific proposals within and in the immediate vicinity of these locations would provide a strong reason for refusing or restricting development. Consideration will also need to be given to a wider range of planning considerations, including effects on other areas and assets not referenced under NPPF footnote 7, such as the existing accessible open spaces illustrated in Figure B1 in **Appendix B**.

3.6 It should be noted that Listed Buildings have not been included in these figures to improve legibility. These assets may provide a strong reason for refusing or restricting development and should therefore be reviewed separately. The locations of these assets are illustrated in parcel pro forma reports for commissioning authorities.

3.7 Each NPPF footnote 7 designation is individually mapped in Figures B2 and B3 in **Appendix B**. The following NPPF footnote 7 designations are not shown outside Greater London:

- Local Green Space.
- Conservation Area.
- Greater London Archaeological Priority Areas (APAs) - Tier 1.

Possible fundamental impacts to remaining Green Belt land

3.8 It is not possible to make definitive judgements on what constitutes a fundamental impact without a clearer understanding of the exact location of release or development in a borough, its scale and land use, including what Green Belt land would remain within a plan area. Consequently, this chapter outlines broad scenarios that have a greater likelihood of fundamentally undermining the purposes in each borough.

3.9 Once each London borough is in a position to evaluate specific proposals for Green Belt release or development, it will be possible to make a definitive judgement as to whether they would (individually or cumulatively) fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole.

Contribution to Green Belt Purpose E – to assist in urban regeneration

3.10 In the absence of any clear guidance on what percentage of brownfield land enables the Green Belt to play a stronger, or more limited, role in encouraging urban regeneration, and the fact that Purpose E must have already been followed before options in the Green Belt are considered further, a uniform level of moderate contribution to Purpose E has been applied to all Green Belt land in London.

Barking and Dagenham

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.11 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

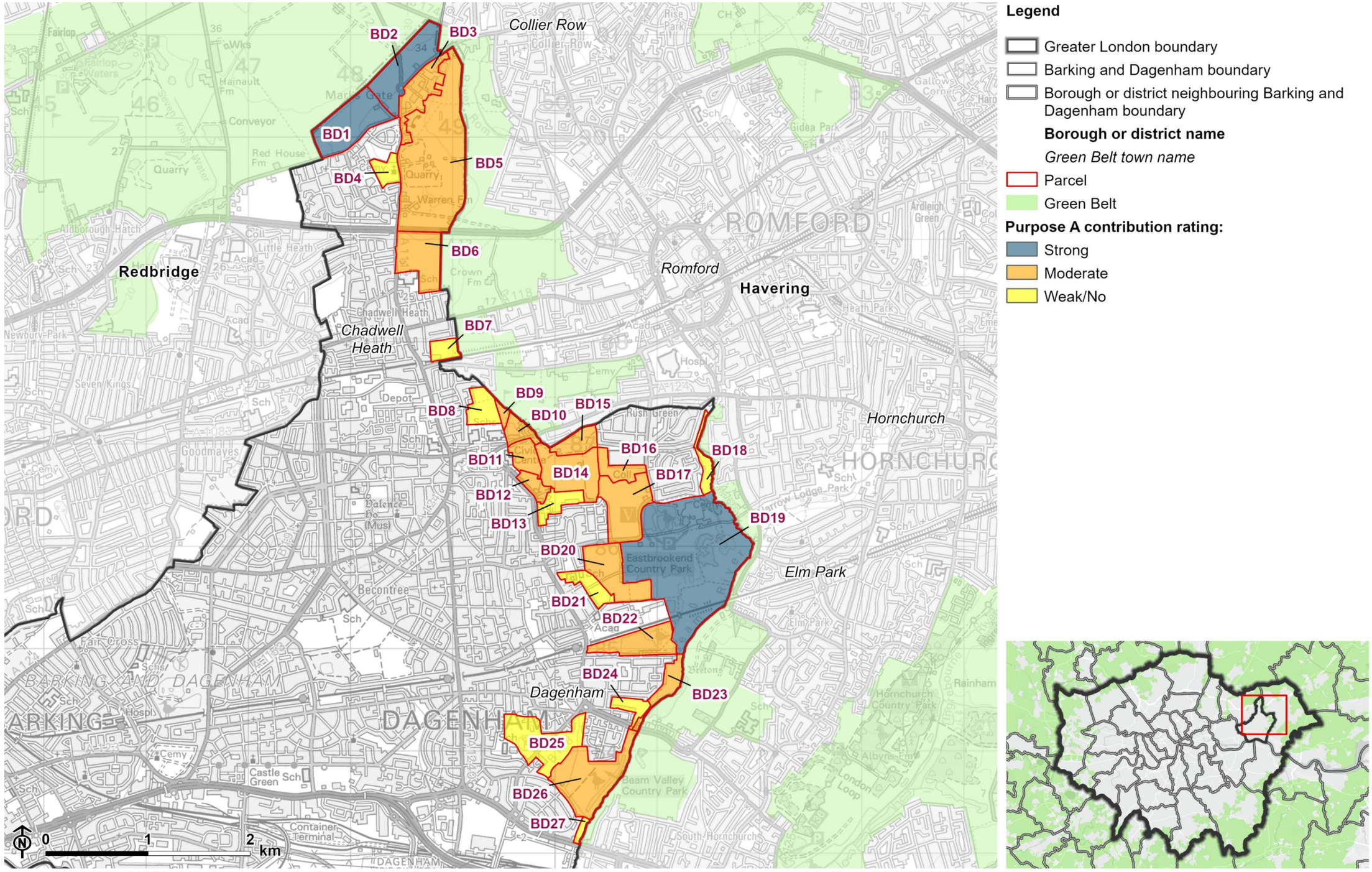
3.12 Three parcels in the borough make a strong contribution to Purpose A (parcels BD1, BD2 and BD19). Parcels BD1 and BD2 are contiguous with the wider less contained open countryside of the Fairlop Plain, which is largely within the neighbouring London Borough of Redbridge to the north west. Release and development in these parcels north of Billet Road and Collier Row Road would represent notably incongruous sprawl of the large built up area into the open countryside. Parcel BD19 is the largest open area of Green Belt land in the borough, comprising the central and southern portions of the Eastbrookend Country Park and The Chase Local Nature Reserve. It is covered by lakes and ponds and woodland blocks, the breaching of which would represent significant localised sprawl of the surrounding large built up area.

3.13 Green Belt land that contain significant areas of developed (parcels BD13 and BD21) and/or are contained and urbanised by the surrounding urban area (parcels BD4, BD7, BD8, BD13, BD18, BD21, BD24, BD25 and BD27) make a weak/no contribution to Purpose A.

3.14 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is to some degree contained and/or urbanised by the large built-up area but is still generally open and sufficiently distinct from it that development would have some sprawling influence.

3.15 Figure 3.1 illustrates the variations in contribution to Purpose A across Barking and Dagenham.

Figure 3.1: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.16 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.17 The areas that make a strong contribution are the least urbanised, open and often well treed parcels in the narrowest and therefore most fragile gaps between neighbouring towns. Parcels that make a strong contribution to Purpose B include:

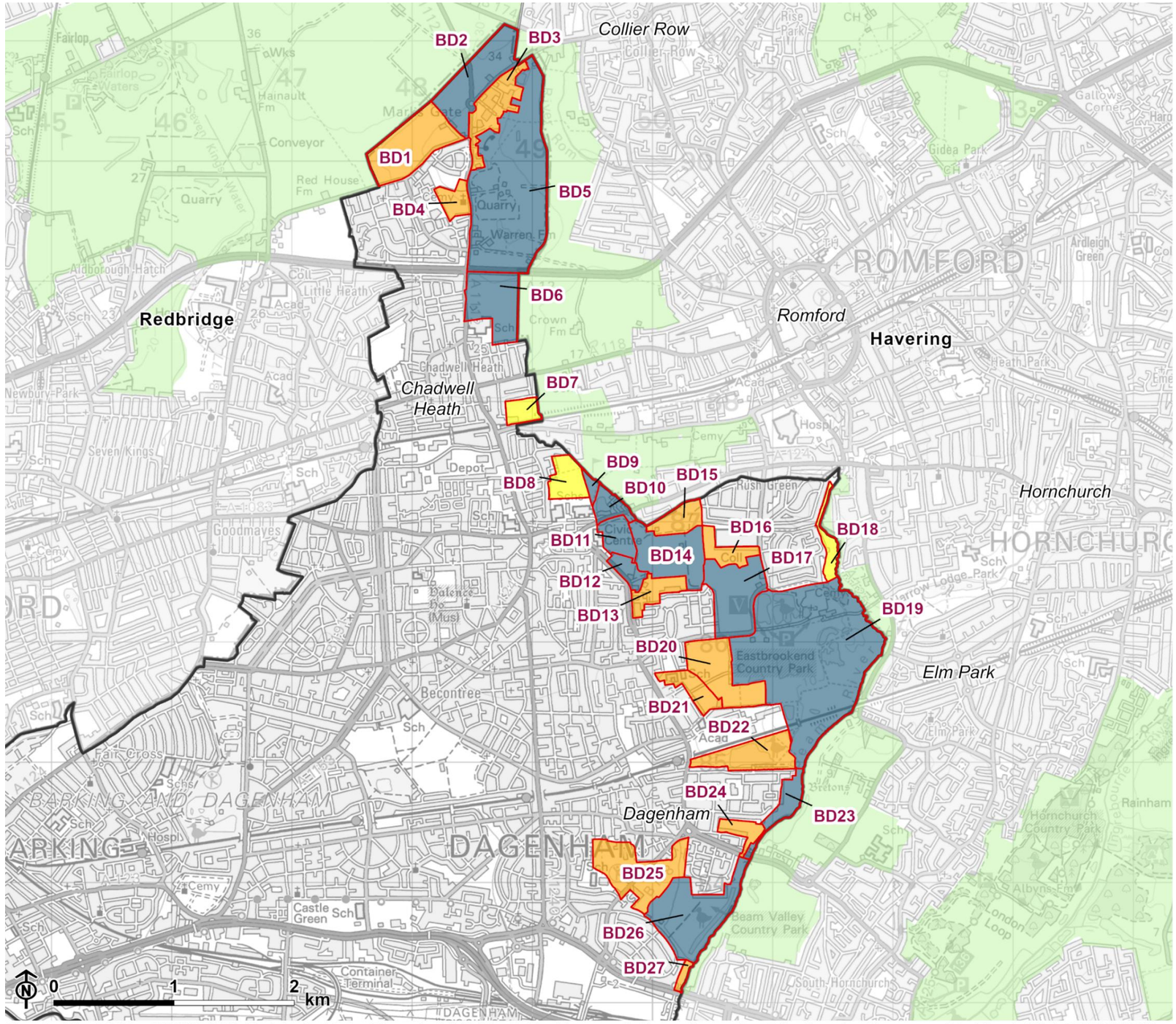
- Parcel BD2 at the northern tip of the borough makes a strong contribution to Purpose B. This parcel lies in two gaps: a wider moderate gap to the north separating what remains of the gap between Chadwell Heath to the south and Hainault to the north and a much more fragile gap between Collier Row to the west and Chadwell Heath to the east. Development along Collier Row Road directly to the south increases the fragility of this gap, although it is also acknowledged that the significance of the further loss of separation between towns in this part of the gap is limited by the existing ribbon development along Collier Row Road.
- Parcels BD5 and BD6 make a strong contribution to Purpose B because they contain the largest areas of uninterrupted open land between the neighbouring towns of Chadwell Heath, Collier Row and Romford.
- A group of parcels BD9, BD10, BD11, BD12, BD14 and BD17 make a strong contribution maintaining separation between the neighbouring towns of Dagenham, Romford and Hornchurch via Rush Green.
- Parcels BD19 makes a strong contribution to Purpose B as the largest open area of Green Belt land in the borough, its waterbodies and woodland represent the most substantial separating features maintaining separation between Dagenham, Elm Park, Hornchurch and Romford.
- Parcels BD23 and BD26 following the course of the River Beam and containing the Beam Valley Country Park make a strong contribution to Purpose B for the important role this open land, including the river and associated woodland blocks, play in maintaining separation between the neighbouring towns of Dagenham, Elm Park and Hornchurch.

3.18 Green Belt land that is particularly contained and urbanised by the surrounding urban area such that they do lie in notable open gaps between neighbouring towns (parcels RB7, RB8 and RB18) make a weak/no contribution to Purpose B.

3.19 The remaining areas make a moderate contribution to this purpose because they are more contained or urbanised by urban areas and as such are more peripheral or less substantial parts of the fragile gaps between Barking and Dagenham and Havering towns. These areas are still generally open and sufficiently distinct that they still play some separating role between closely neighbouring towns (parcels BD1, BD4, BD13, BD15, BD21, BD22, BD24, BD25 and BD27). Parcel BD3 contains significant urbanising development but lies within a fragile gap separating the neighbouring towns of Chadwell Heath and Collier Row.

3.20 Figure 3.2 illustrates the variations in contribution to Purpose B across Barking and Dagenham.

Figure 3.2: Contribution to Purpose B – Prevent the merging of neighbouring towns

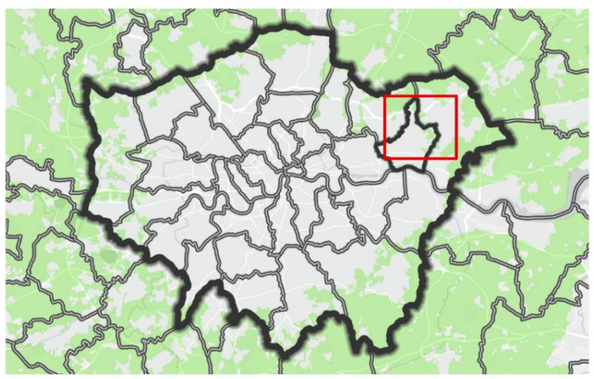


Legend

- Greater London boundary
- Barking and Dagenham boundary
- Borough or district neighbouring Barking and Dagenham boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose B contribution rating:

- Strong
- Moderate
- Weak/No



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.21 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

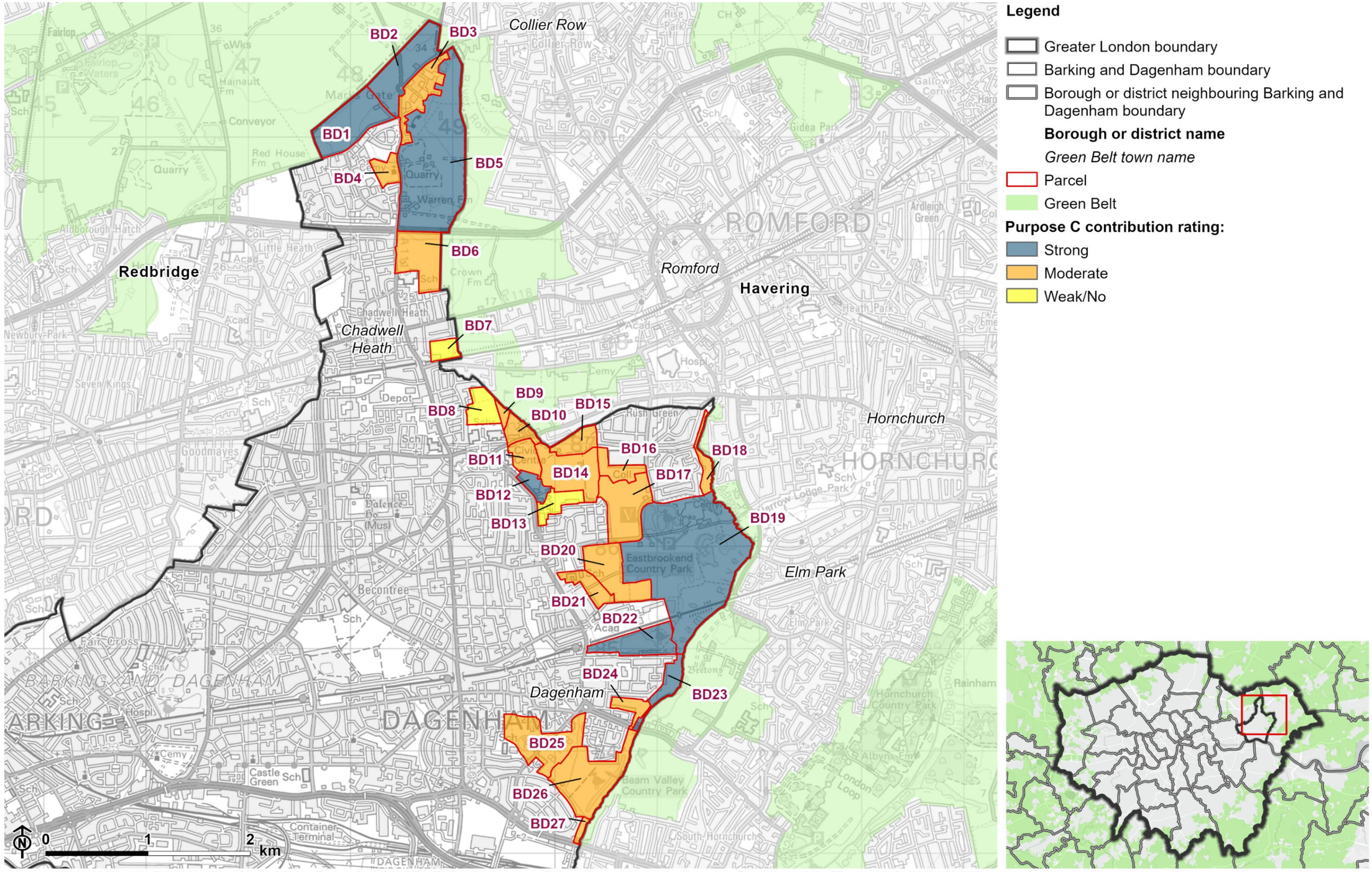
3.22 Large parts of the boroughs Green Belt land are comprised of open countryside that has a strong sense of separation from urban areas and is not subject to any substantial urbanising influence. Parcels BD1, BD2, BD5, BD12, BD19, BD22, BD23 and BD26 make a strong contribution to Purpose C where views of the wider open countryside dominate and dilute any urbanising influence and/or woodlands serve to screen and check the urbanising influences in the countryside.

3.23 Green Belt land that contains significant areas of developed (BD13) and/or are isolated from the wider countryside and urbanised by the surrounding urban area (parcels BD7 and BD8) make a weak/no contribution to Purpose C.

3.24 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where land is developed and/or urbanised but still retains a relationship with the wider countryside or where Green Belt land is open but has land uses associated with the urban area rather than the open countryside, such as sports playing fields, cemeteries and allotments and have limited relationship with the wider countryside such that development would not have a wider encroaching influence.

3.25 Figure 3.3 illustrates the variations in contribution to Purpose C across Barking and Dagenham.

Figure 3.3: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.26 A review of relevant designations within and adjacent to the borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to seven settlements large enough to be considered towns in Green Belt terms: Chadwell Heath, Collier Row, Dagenham, Elm Park, Hainault, Hornchurch, and Romford.

3.27 Chadwell Heath, Collier Row, Elm Park and Hainault, are not considered to be historic. These settlements are predominantly suburban areas developed in the late 19th and/or early 20th centuries following the arrival of the railways. They lack an identified 'historic urban core' (identified within the Greater London Historic Landscape Characterisation (GLHLC), 2021) and do not contain any conservation area designations.

3.28 However, the following towns have conservations areas located adjacent to Green Belt land:

- **Dagenham Village Conservation Area** covers the historic village core of the town. However, not much of the original fabric of the historic core remains, as noted within the conservation area appraisal (2009) '*most of the village buildings were knocked down to make way for new development which at the time was considered progress'* and *'Crown Street, the main street of the village was largely destroyed in the 1960s and 1970s in preparation for the building of the Ibscott Estate'*. In regard to landscape setting, the appraisal notes that the area *'is located on the Wantz Stream which flows into the Beam River'* but that *'the conservation area today is predominantly surrounded by development dating from the Victorian era through to the late 1990's'* with *'no distant views from the conservation area*'.
- Hornchurch (within the neighbouring London Borough of Havering) occupies higher ground between the River Rom/Beam to the west and the River Ingrebourne to the east. The GLHLC (2012) identifies an area of 'historic urban core' (intermediate type within the 'urban settlement' broad type) within Hornchurch, and area also covered partly by **St Andrew's Conservation Area**. The conservation area appraisal (n.d.) states that *'the focus and defining element of the Conservation Area is St. Andrew's Church, which resonantly identifies Hornchurch as an ancient place with long held significance, situated on the main route to London, today's Upminster Road'*. To the west of St Andrew's lies **Langtons Conservation Area**, which the conservation area appraisal (2012) describes as being *'the cultural core of Hornchurch'*, and its

character or special interest being defined as *''objects in a landscape', a grouping of cultural, ceremonial and recreational buildings and spaces in a verdant setting, with large areas of open space'*. However, these historic parts of the town are surrounded by later development (including interwar development that directly borders St Andrew's) which limits any physical and visual relationship with surrounding Green Belt land within Barking and Dagenham to the west.

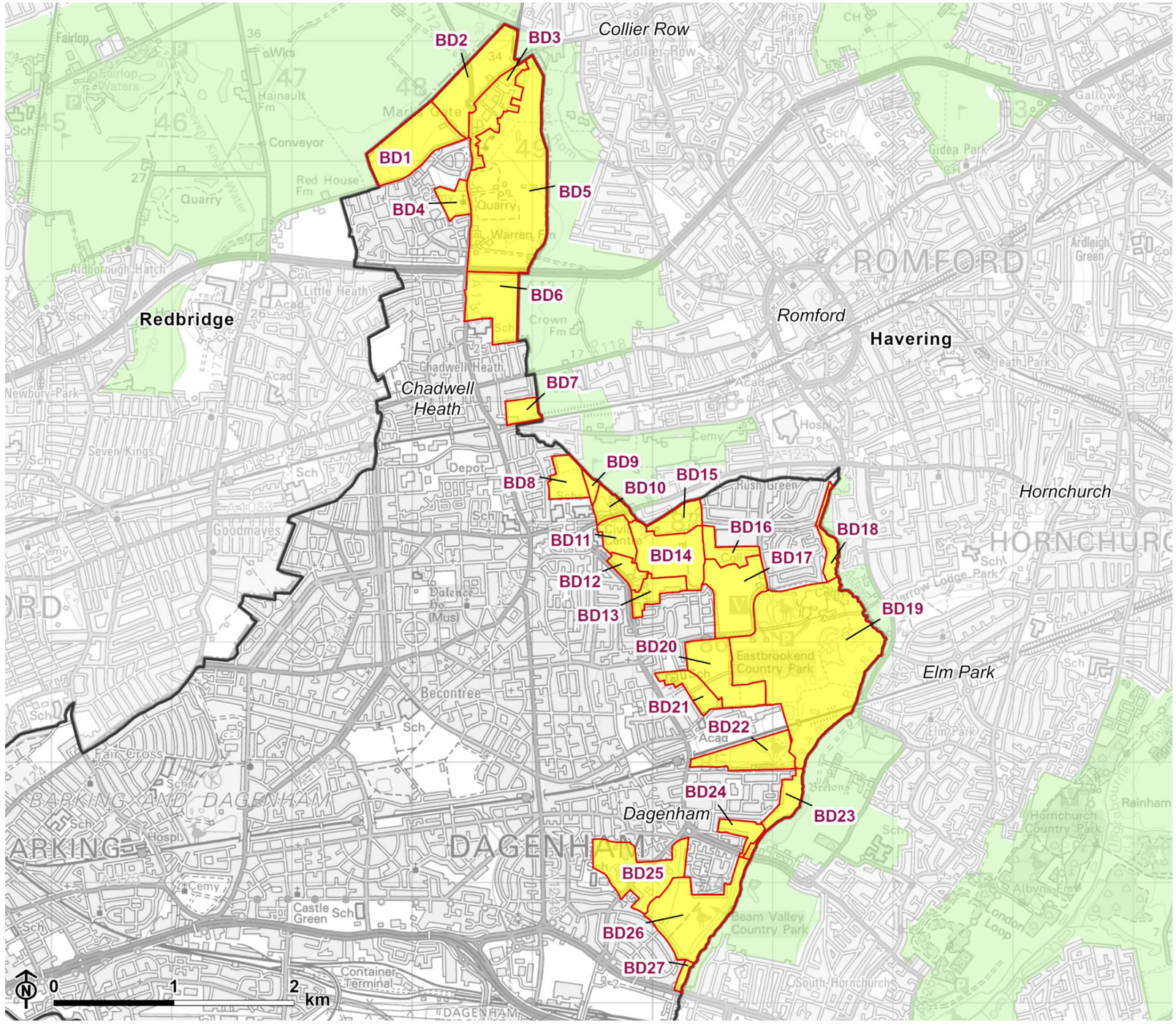
- Romford (also within the neighbouring London Borough of Havering), a market town since the 13th century centred on the medieval crossroads formed by the Market Place, High Street, North Street and South Street. This historic core is covered by **Romford Conservation Area**, the conservation area appraisal (n.d.) for which highlights that *'the main purpose of designation was to protect the group of historic buildings at the west end of the Market Place: St Edward's Church, Church House, No 7 Market Place, Lloyds Bank, The Lamb Inn and the Golden Lion Inn'*. This historic part of the town is surrounded by later development and the modern ring (A1251) which physically and visually cuts off the historic core from its immediate suburban setting and limits any physical and visual relationship with wider surrounding Green Belt land within Barking and Dagenham to the west. To the north-east of Romford Conservation Area lies **Gidea Park Conservation Area**. This comprises a large part of the 20th century residential suburb known as Gidea Park and is therefore not considered to form a historic part of the town.

3.29 Based on the above, there are no areas of the Green Belt land within the borough considered to make more than a weak/no contribution to Green Belt Purpose D. However, it is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.30 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.31 Figure 3.4 illustrates the variations in contribution to Purpose D across Barking and Dagenham.

Figure 3.4: Contribution to Purpose D – Preserve the setting and special character of historic towns

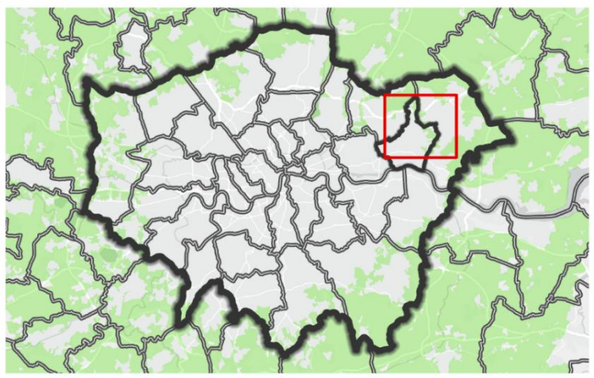


Legend

- Greater London boundary
- Barking and Dagenham boundary
- Borough or district neighbouring Barking and Dagenham boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose D contribution rating:

- Strong
- Moderate
- Weak/No



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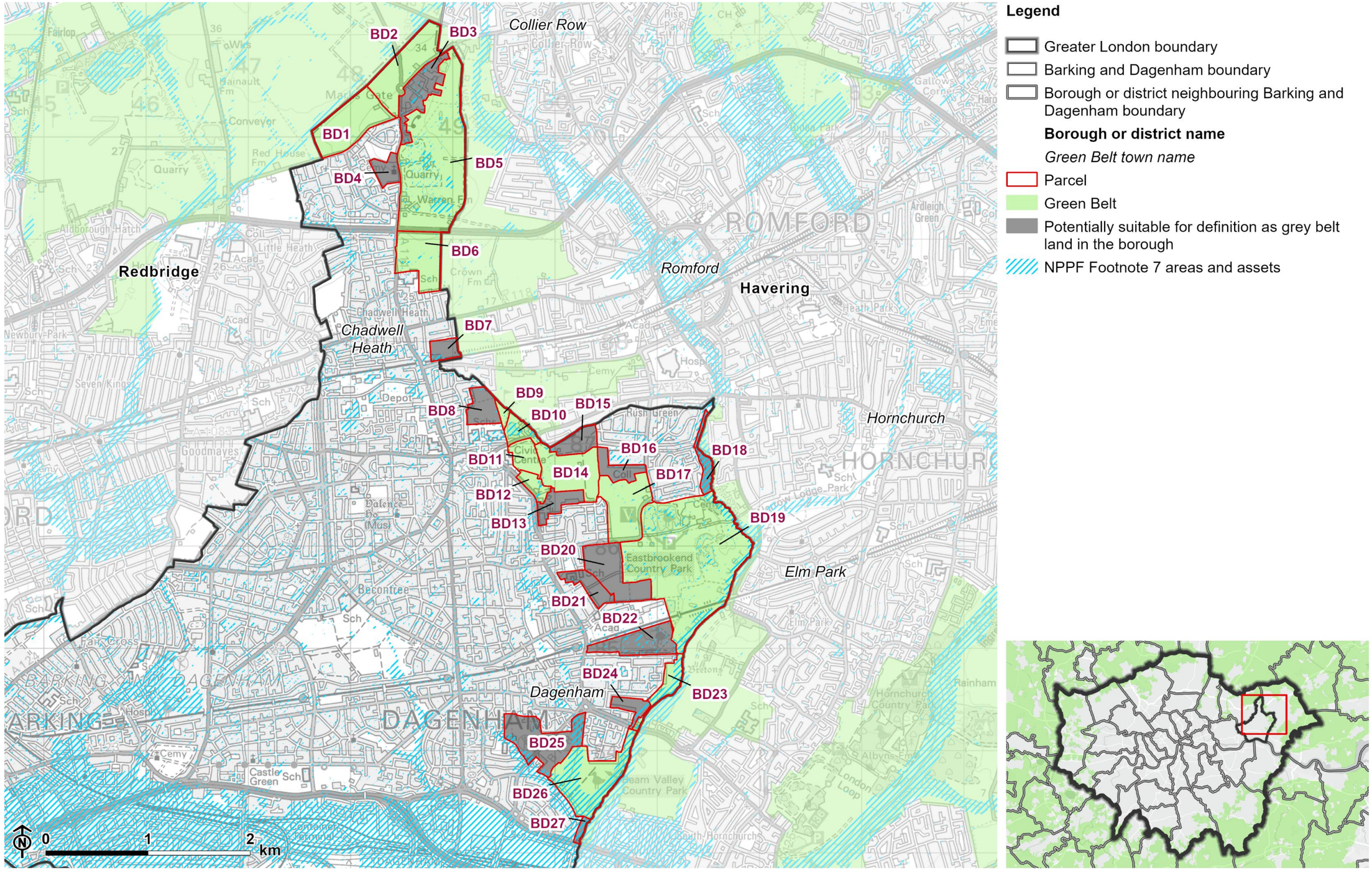
Potential grey belt in the London Borough of Barking and Dagenham

3.32 Having regard to the definition set out in the NPPF, the following areas of Barking and Dagenham are defined as having potential for definition as grey belt land subject to further work by the borough:

- The ribbon development and adjacent urbanised land along Collier Row Road (BD3).
- Chadwell Health (Marks Gate) Cemetery and the Kingston Hill Recreation Ground (BD4).
- West Ham United Football Club Academy and training ground (BD7).
- Robert Clack School, leisure centre and associated playing fields and the Temple Allotments (BD8).
- Open and developed land immediately north and west of the Parkside House estate (BD13).
- Dagenham Central Park golf course, tennis courts and children's play area (BD15).
- The car park and sports pitches associated with Barking and Dagenham College (BD16).
- Open sports pitches associated with Goresbrook cricket club, Eastbrook School and the May and Baker Club car park (parcels BD20 and BD21).
- The open but significantly contained woodland and water north of Western Avenue and the south of railway line east of Dagenham East Station (BD22).
- Dagenham United Football Club playing pitches and adjacent scrubland (BD24).
- Old Dagenham Park, The Leys Park playing pitches and northern contained section of the tree lined Wantz Stream (BD25).
- The contained Beam County Primary School grounds and pitches (BD27).

3.33 Figure 3.5 illustrates the area potentially suitable for definition as grey belt land within Barking and Dagenham.

Figure 3.5: Green Belt land potentially suitable for definition as grey belt land



Legend

- Greater London boundary
- Barking and Dagenham boundary
- Borough or district neighbouring Barking and Dagenham boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets

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Highest and lowest contributing Green Belt land

3.34 The majority of Green Belt in Barking and Dagenham makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include:

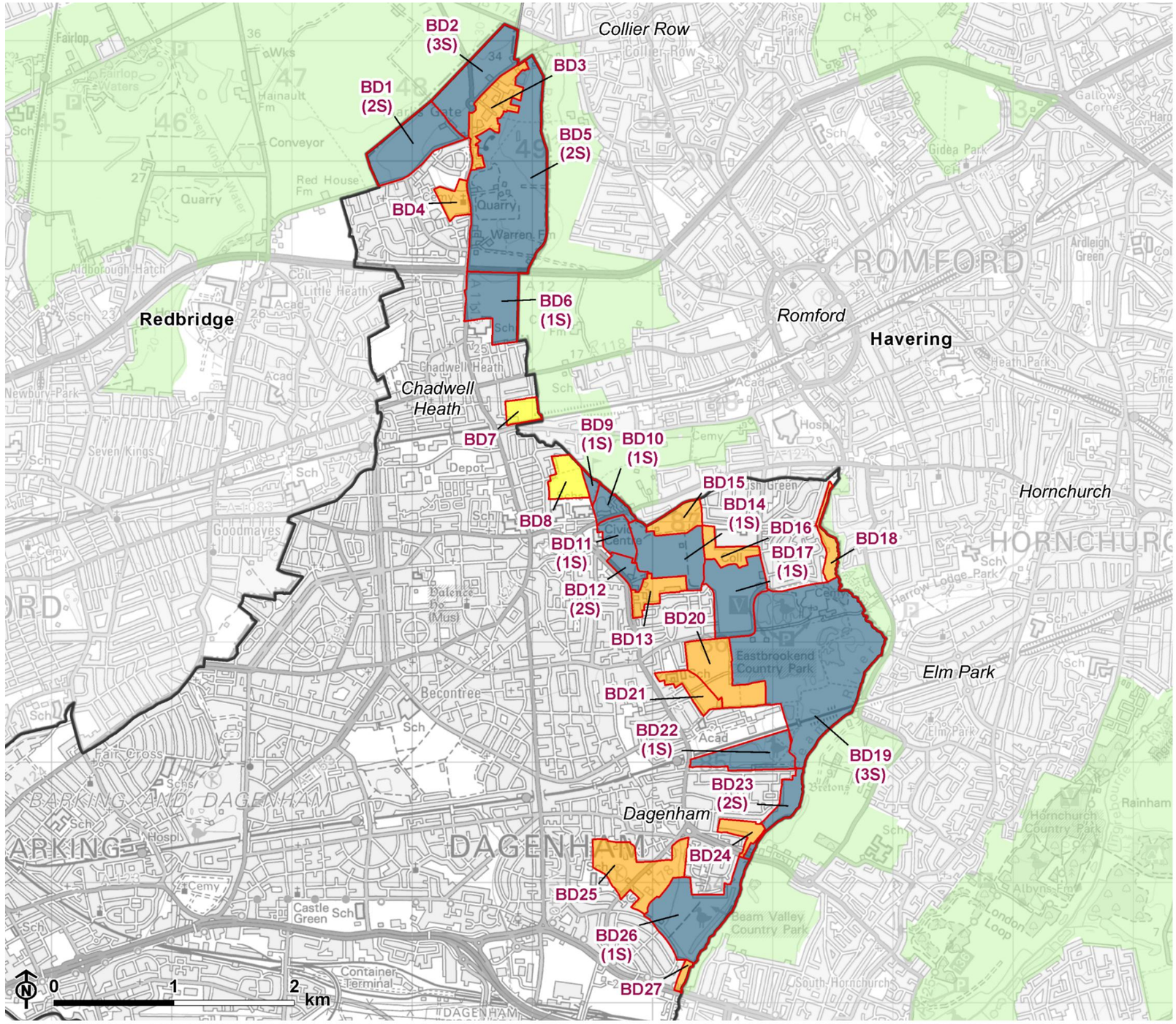
- The far northwest of the borough's Green Belt north of Billet Road and Collier Row Road (parcels BD1 and BD2) makes a strong contribution to purposes A and C, with parcel BD2 also making a strong contribution to Purpose B. Directly to the south, the open fields and Warren Park Golf Course (parcels BD5 and BD6) make a strong contribution to Purpose B, with parcel BD3 also making a strong contribution to Purpose C.
- The southern tip of the Crowlands Heath Golf Club (BD9) in combination with the parcels to the south forms part of a larger area of land within the neighbouring London Borough of Havering that makes a strong contribution to Purpose B.
- The northern portion of Eastbrookend Country Park and Dagenham Central Park immediately to the north west (parcels BD10, BD11, BD12, BD14 and BD17) all make a strong contribution to Purpose B and BD12 also contribute strongly to Purpose C.
- The central and southern portion of Eastbrookend Country Park and The Chase Local Nature Reserve (BD19) containing a number of lakes and ponds and woodland makes a strong contribution to purposes A, B and C.
- The wooded course of the Beam River and adjacent open land, including the Beam Valley Country Park and Beam Park (parcels BD22 and BD23) make a strong contribution to Purpose C and the Beam Park (BD26) and the Beam Valley Country Park (BD23) also contribute strongly to Purpose B.

3.35 The areas within Barking and Dagenham that contribute the least to the Green Belt purposes are significantly contained and urbanised by neighbouring urban areas such that they have no notable relationship with the wider open countryside (parcels BD7 and BD8). All these parcels make no more than a weak/no contribution to the Green Belt purposes.

3.36 Figure 3.6 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the

number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.6: Highest contribution to NPPF Green Belt purposes



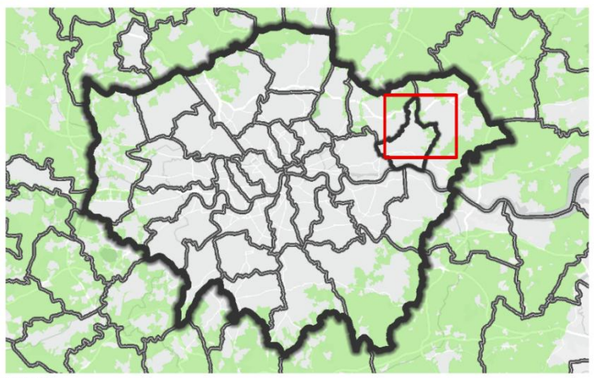
Legend

- Greater London boundary
- Barking and Dagenham boundary
- Borough or district neighbouring Barking and Dagenham boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.37 In light of the scale and contiguity of Green Belt land in Barking and Dagenham and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Chadwell Heath and Collier Row.
  - Chadwell Heath and Romford.
  - Dagenham and Romford/Elm Park/Hornchurch.
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.

Barnet

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.38 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

3.39 Parcels BA2, BA9, BA11, BA14, BA61 and BA45 contribute strongly to Purpose A due to the fact that they contain the higher open (often wooded) slopes that are subject to the fewest urbanising influences, have the strongest relationship with the wider countryside and represent the most notable check on the sprawl of the city. Parcels BA1 makes a strong contribution to Purpose A for the important role in inhibiting the merging of the development north and south of the M1 in between Borehamwood, Elstree, Edgware and Stanmore and the associated risk of significantly increasing their combined sprawling influence. Parcels BA65 and BA68 make a strong contribution to Purpose A for the important role in inhibiting the merging of Arkley and Borehamwood and the associated risk of significantly increasing their combined sprawling influence. Parcels BA75, BA76 and BA81 make a strong contribution to Purpose A for the important role in inhibiting the merging of

Chipping Barnet/New Barnet and Monken Hadley and the associated risk of significantly increasing their combined sprawling influence.

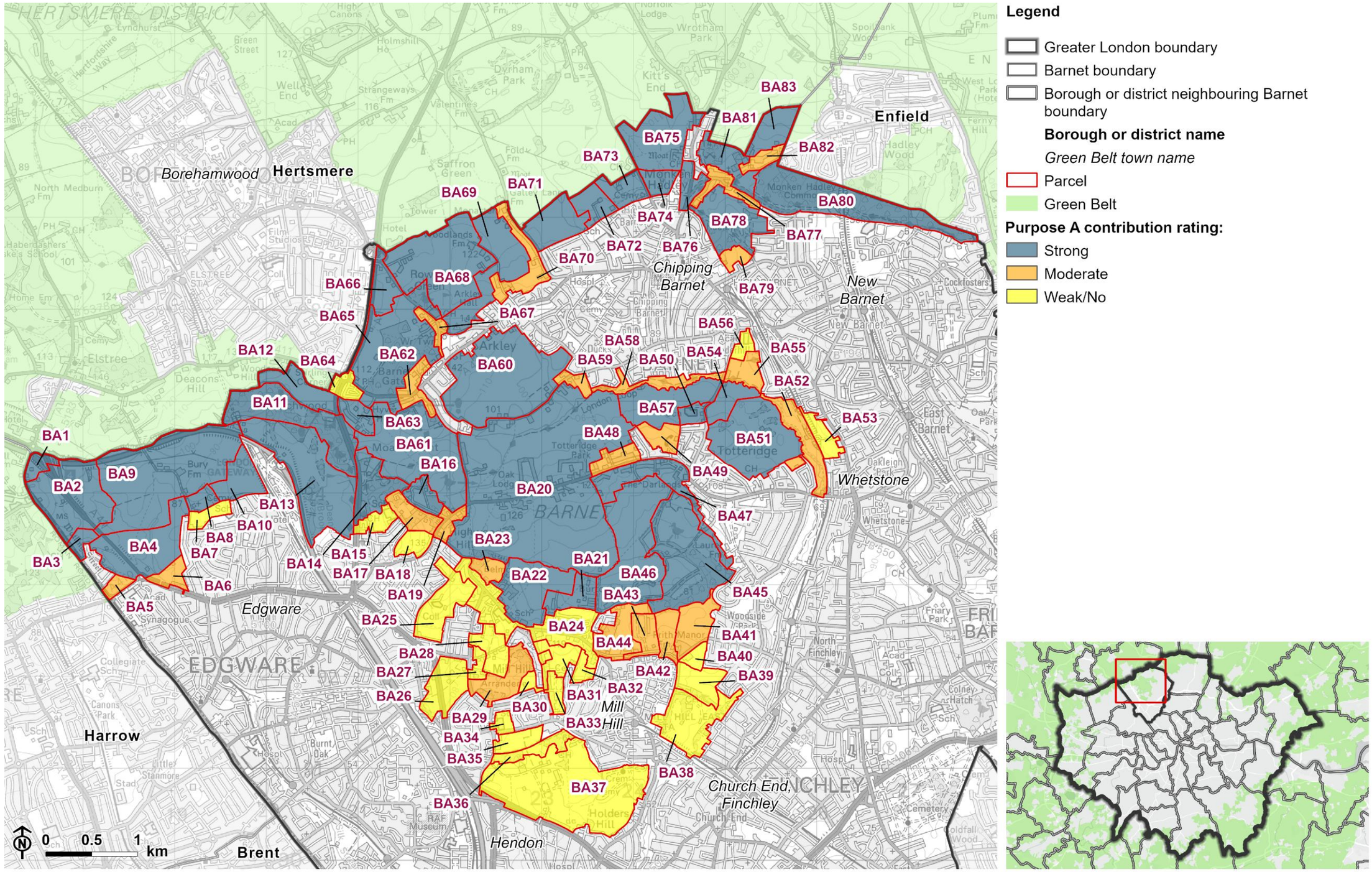
3.40 Other areas of the borough make a strong contribution to Purpose A as some of the least urbanised, open and often well treed parcels across the borough, which prevent localised sprawl into the open countryside in their immediate vicinity (parcels BA3 and BA4, BA8, BA10, BA12 and BA13, BA16, BA20-BA22, BA46 and BA47, BA50, BA51, BA54, BA57, BA60, BA69, BA71-BA74, BA78, BA80 and BA83). Release and development in these locations would represent notable incongruous sprawl into the open countryside.

3.41 Green Belt land that is particularly developed (parcels BA15, BA24, BA34, BA40, BA56 and BA64) and/or are largely or wholly contained and urbanised by the surrounding large built-up area (parcels BA7, BA18, BA25-BA28, BA30-BA39 and BA53) make a weak/no contribution to Purpose A.

3.42 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more contained or urbanised and/or developed with some loss of openness but still has sufficient openness and distinction from the large built up area that further development would have some sprawling influence (parcels BA5 and BA6, BA17, BA19, BA23, BA29, BA41-BA44, BA48, BA49, BA52, BA55, BA58, BA59, BA62, BA67, BA70, BA77, BA79 and BA82).

3.43 Figure 3.7 illustrates the variations in contribution to Purpose A across Barnet.

Figure 3.7: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.44 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.45 The areas that make a strong contribution are the least urbanised, open and often well treed parcels in the narrowest and therefore most fragile gaps between neighbouring towns. Parcels that make strong contributions to Purpose B include:

- Parcels BA1, BA2, BA9 and BA11-BA14 make a strong contribution maintaining separation between the neighbouring towns of Edgware and Borehamwood.
- Parcels BA20, BA22, BA60 and BA61 make a strong contribution maintaining separation between the neighbouring towns of Chipping Barnet (including via Arkley), Whetstone (via Totteridge) and Mill Hill made more fragile by ribbon development along Totteridge Common, Hendon Wood Lane, and Highwood Hill Road.
- Parcels BA39-BA42 make a strong contribution maintaining separation between the neighbouring towns of Mill Hill and Whetstone via Woodside Park.
- Parcels BA44 and BA46 make a strong contribution maintaining separation between the neighbouring towns of Whetstone (via Totteridge) and Mill Hill.
- Parcels BA20, BA54 and BA57 make a strong contribution and parcels BA48, BA50 and BA51 make a strong contribution maintaining separation between the neighbouring towns of Chipping Barnet (including via Arkley) and Whetstone (via Totteridge).
- Parcels BA63, BA65, BA66, BA68 and BA69 make a strong contribution maintaining separation between the neighbouring towns of Chipping Barnet (via Arkley) and Borehamwood.
- Parcel BA78 makes a strong contribution maintaining what remains of the partial separation between Chipping Barnet and New Barnet already merged directly to the south.

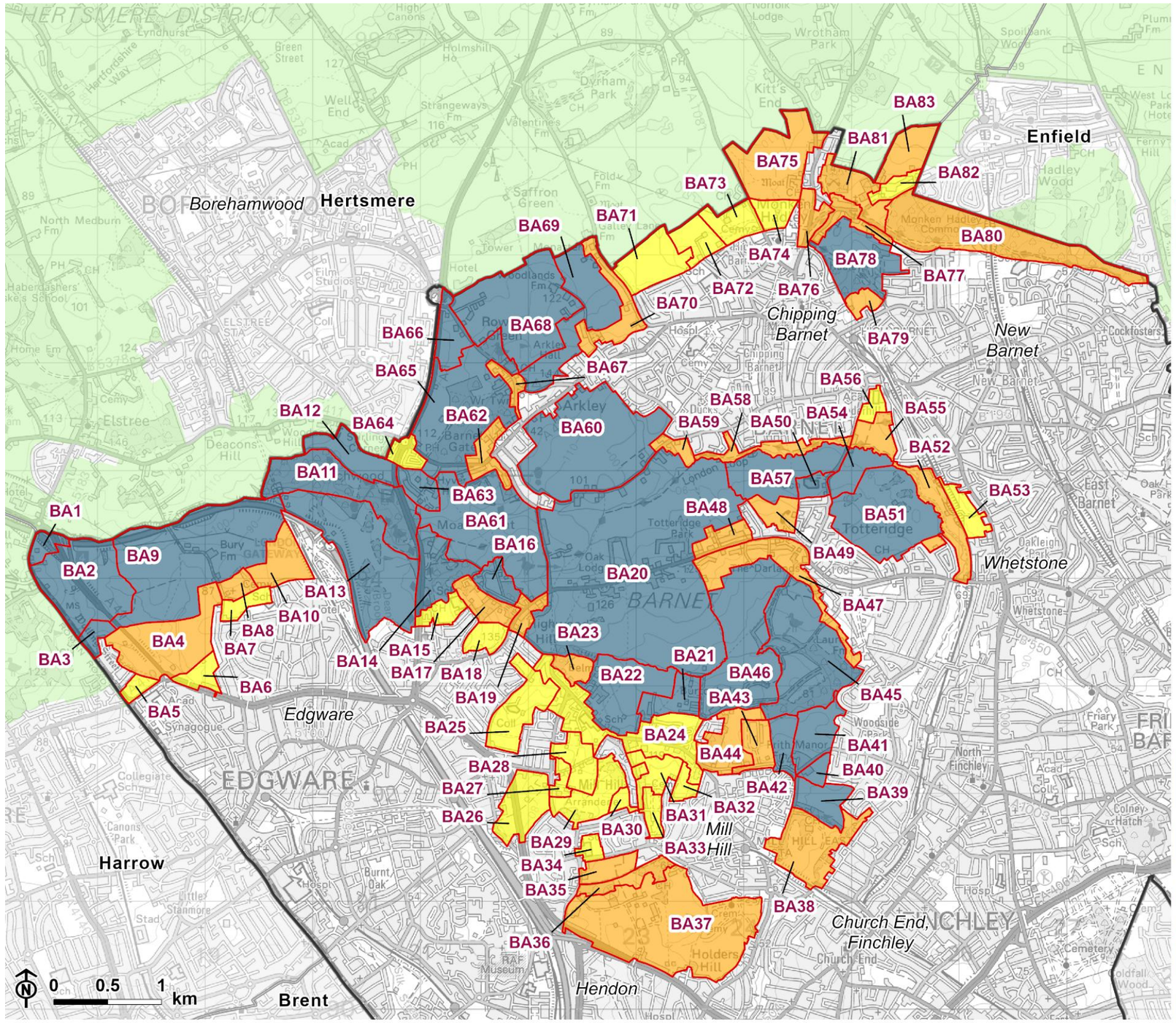
3.46 Green Belt land that is particularly developed (parcels BA15, BA24, BA34, BA56 and BA64) or contained within and/or urbanised by the surrounding urban area such that they do not lie in notable open gaps between neighbouring towns (parcels BA5-BA7, BA18, BA25-BA33 and BA53) or open countryside that does lie within a notable gap between neighbouring towns (parcels BA71-BA74) make a weak/no contribution to Purpose B.

3.47 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as:

- Parcels BA4, BA8 and BA10 make some contribution to maintaining separation between the neighbouring towns of Edgware and Borehamwood by virtue of their partial containment and/or urbanisation by an urban area.
- Parcels BA17, BA19 and BA23 make some contribution to maintaining separation between the neighbouring towns of Chipping Barnet (including via Arkley), Whetstone (via Totteridge) and Mill Hill, by virtue of their partial development and/or urbanisation by an urban area.
- Parcels BA35-BA37 make some contribution to maintaining separation between the neighbouring towns of Mill Hill and Hendon already merged to the east and west.
- Parcel BA38, BA43 and BA44 make some contribution to maintaining separation between the neighbouring towns of Mill Hill and Whetstone via Woodside Park, by virtue of their containment.
- Parcel BA47 makes some contribution to maintaining separation between the neighbouring towns of Whetstone (via Totteridge) and Mill Hill, by virtue of its development and partial urbanisation by the neighbouring urban area.
- Parcels BA49, BA52, BA55, BA58 and BA59 make some contribution to maintaining separation between the neighbouring towns of Chipping Barnet (including via Arkley) and Whetstone (via Totteridge), by virtue of their containment and/or urbanisation by adjacent urban areas.
- Parcels BA62, BA67 and BA70 make some contribution to maintaining separation between the neighbouring towns of Chipping Barnet (via Arkley) and Borehamwood owing to the existing development within the parcels.
- Parcel BA79 makes some contribution to maintaining what remains of the partial separation between Chipping Barnet and New Barnet already merged directly to the south due to its existing relationship with the neighbouring towns at their junction.
- Parcels BA75-BA77, BA80, BA81 and BA83 make some contribution to maintaining separation between the neighbouring towns of New Barnet/Enfield and Potters Bar (via Hadley Wood) by virtue of the moderate width of the gap and all the parcels forming no more than a small part of it.

3.48 Figure 3.8 illustrates the variations in contribution to Purpose B across Barnet.

Figure 3.8: Contribution to Purpose B – Prevent the merging of neighbouring towns

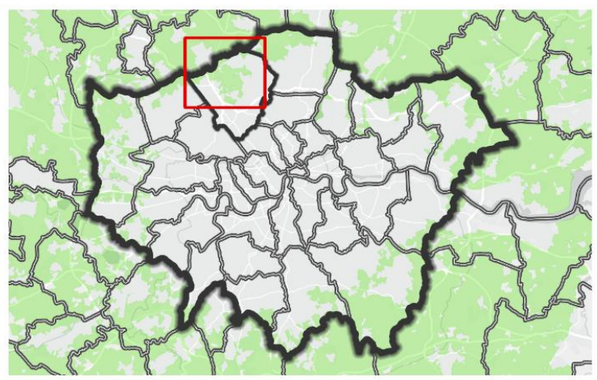


Legend

- Greater London boundary
- Barnet boundary
- Borough or district neighbouring Barnet boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose B contribution rating:

- Strong
- Moderate
- Weak/No



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.49 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

3.50 The vast majority of the borough's Green Belt land is open countryside that has a strong sense of separation from urban areas and is not subject to any substantial urbanising influence. These areas make at least a strong contribution to this Green Belt purpose (parcels BA1, BA3 and BA4, BA8, BA10, BA12 and BA13, BA16, BA22, BA41 and BA42, BA44, BA47, BA50, BA51, BA60, BA63, BA69, BA71, BA73-BA76, BA78 and BA83). Such locations are more vulnerable to encroaching impacts on the wider countryside.

3.51 These wider impacts are particularly acute where release and development within parcels risks severing large areas of open countryside, isolating them within the urban area or just significantly reducing their association with the wider open countryside. This risk is greatest in the narrowest portions of the green wedges in the borough in the gap between Arkley and Mill Hill (parcels BA20 and BA61), between Totteridge and Mill Hill (BA46) between Totteridge and Chipping Barnet (parcels BA54 and BA57), between Arkley and Borehamwood (parcels BA65 and BA68) and between Monken Hadley, Hadley Wood and Chipping Barnet/New Barnet. These parcels make a strong contribution to Purpose C, as do parcels BA2, BA9, BA11, BA14, BA45 and BA61 by virtue of their particularly strong association with the open countryside. Their higher (often wooded) slopes have notable separation from the urban areas in the borough, generally screened by thick woodland or facing out away from them.

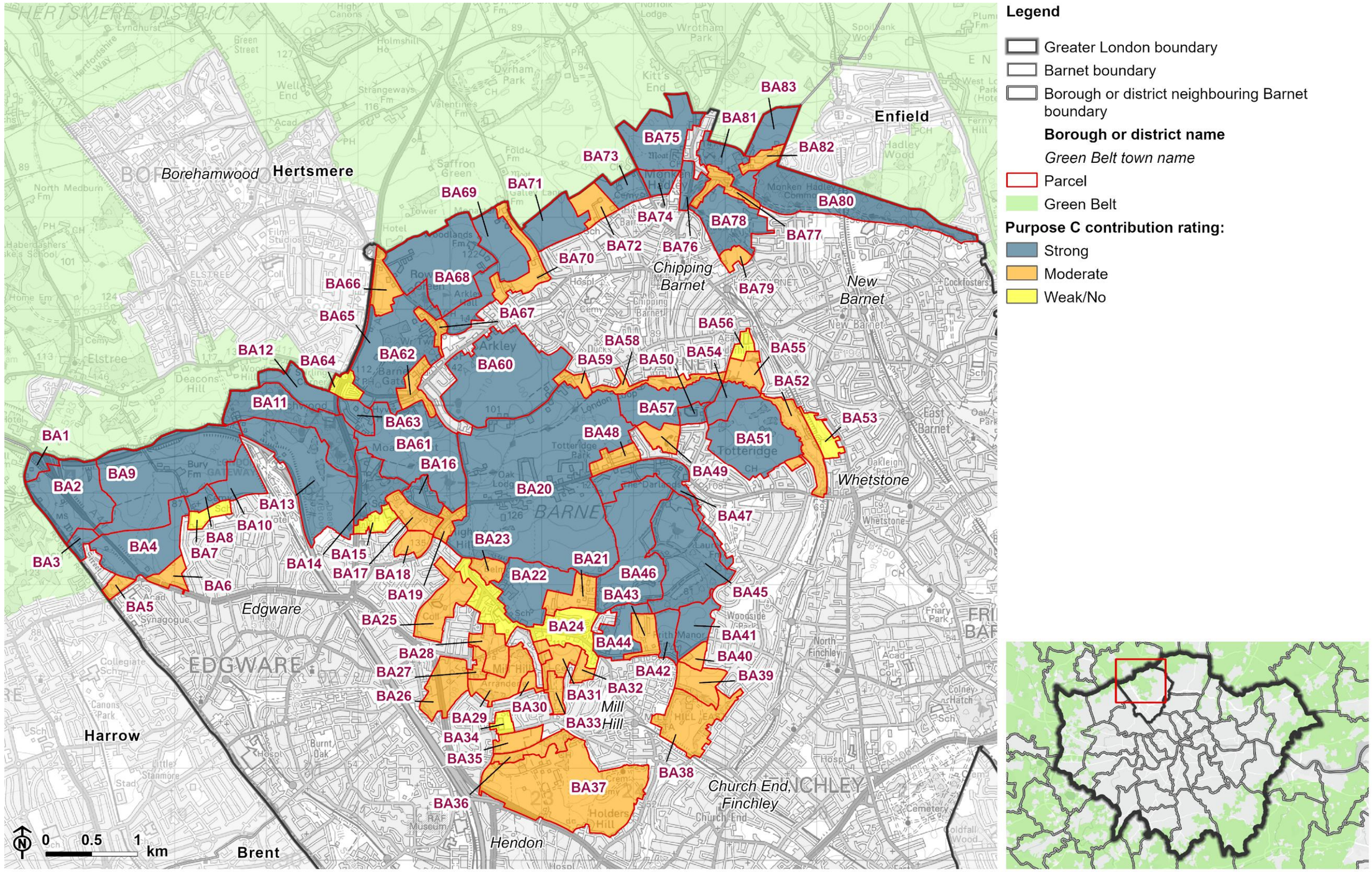
3.52 Green Belt land that is particularly developed (parcels BA15, BA24, BA34, BA56 and BA64) and/or contained and urbanised by the surrounding urban area (parcels BA7 and BA53) make a weak/no contribution to Purpose C.

3.53 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more contained or urbanised and/or developed with some loss of openness but still has sufficient openness and distinction that further development would represent notable encroachment of the countryside. Other areas may be open but have land uses associated with the urban area rather than the open countryside, such as sports playing fields, cemeteries and allotments and have limited relationship with the wider countryside such that development would not have a wider encroaching influence. Notable moderately contributing parcels include

parcels BA5 and BA6, BA17, BA18, BA19, BA21, BA23, BA25-BA33, BA35-BA40, BA43, BA48, BA49, BA52, BA55, BA58, BA59, BA62, BA66, BA67, BA70, BA72, BA77, BA79 and BA82.

3.54 Figure 3.9 illustrates the variations in contribution to Purpose C across Barnet.

Figure 3.9: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.55 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to ten settlements large enough to be considered towns in Green Belt terms – Borehamwood, Bushey, Chipping Barnet, Church End, Edgware, Hendon, Mill Hill, New Barnet, Potters Bar, and Whetstone.

3.56 Church End and Edgware both have historic cores protected by conservations area, although are located deep within the urban area and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt within Barnet. The areas are focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points). The Greater London Historic Landscape Characterisation (GLHLC) (2021) identifies two small areas of 'historic urban core' (intermediate type within the 'urban settlement' broad type) within Whetstone, with the more southern area also featuring a cluster of Grade II listed buildings. However, these remnant historic areas are surrounded by later development which limits the visual relationship with the open countryside designated as Green Belt along the valley of the Dollis Brook to the west. Bushey and Potters Bar are located in Hertsmere District to the north-west and north-east of Barnet respectively, at such a distance that Green Belt land within Barnet makes little to no contribution to their settings and special character.

3.57 Borehamwood and New Barnet are not considered to be historic towns as they lack a 'historic urban core' (intermediate type within the 'urban settlement' broad type) identified within the GLHLC and are not protected by conservation area designations. Historic mapping shows the original settlement of Borehamwood to be a small hamlet/village which grew considerably following the Second World War, with the construction of large areas of council housing for displaced Londoners. As the name suggests, New Barnet is generally a more recent phase of development than Chipping Barnet to the west. New Barnet owes its conception to the building of the Great Northern Railway in 1850, following which large scale residential development occurred with further expansion in the early twentieth century.

3.58 The following towns have conservations areas which are located in relatively close proximity to Green Belt land:

- The GLHLC (2021) identifies an area of 'historic urban core' (intermediate type within the 'urban settlement' broad type) within Chipping Barnet to the west, an

area also covered by **Wood Street Conservation Area** and featuring several listed buildings including the Grade II* St John the Baptist Church. The town developed on a hill with Wood Street following the contour of the hill on an east to west axis. The landform drops away to the south of the road towards the valley of the Dollis Brook, whereas that to the north is relatively flat. The conservation area character appraisal statement (2007) notes that 'the elevated position enjoyed by Wood Street allows long range views down side roads to the south over the open countryside of the Dollis Valley' whilst 'to the north … relatively flat and shorter range views into side roads allow an appreciation of the late Victorian urban expansion'. To the north-east of Chipping Barnet lies **Monken Hadley Conservation Area**, which includes the northern end of Chipping Barnet High Street. The Monken Hadley Conservation Area Appraisal Statement (2007) notes that the area 'has managed to retain its special green and leafy character, with so much open space, in sharp contrast with much of suburban London' and that 'Its winding lanes and scattered groups of native trees are set among a traditional English landscape of ancient commons, old hedgerows and open fields'. The area therefore forms a distinctive landscape setting to the north-east of Chipping Barnet. This area also includes the Battle of Barnet 1471 Registered Battlefield which, as the name suggest, has an historical association with the town.

- The high ground at the centre of the parish of Hendon was originally occupied by three hamlets: The Burroughs, Church End and Brent Street. The GLHLC (2021) identifies two areas of 'historic urban core' (intermediate type within the 'urban settlement' broad type) within Hendon, areas also covered by **Hendon Church End Conservation Area** and **Hendon The Burroughs Conservation Area**. The name 'Hendon' is thought to date from Anglo-Saxon times and is linked to the topography of the area, and the presence of a 'high hill'. The topography of Hendon Church End is relatively flat, with the exception of the northern end, where Greyhound Hill slopes dramatically down towards Watford Way. The Hendon Church End Conservation Area Character Appraisal (2012) notes that 'long range glimpsed views out over the north-west of the borough … contribute to the rural atmosphere of the area'. However, there are no documented visual connections between the historic parts of the settlement and the surrounding Green Belt land within Barnet to the north. Those views from the edge of Sunny Hill Park and St Mary's Churchyard look north-west towards distant higher ground within the neighbouring London Borough of Harrow. In contrast the Hendon The Burroughs Conservation Area Character Appraisal (2012) notes that the topography of that area is relatively flat with the identified key views and vistas being internal along roads.

- Mill Hill today consists of the original Mill Hill Village, the later-developed Mill Hill Broadway (now the area's main hub), and Mill Hill East. The original village is protected by **Mill Hill Conservation Area** and features an area of 'historic urban core' (intermediate type within the 'urban settlement' broad type) identified within the GLHLC (2021). The area comprises a scattering of institutional buildings and houses along the high ground of The Ridgeway. As noted within the Mill Hill Conservation Area Character Appraisal Statement (2008) the topography of the area is one of its most notable features and has significantly shaped the way in which the area has developed, with development primarily focused on a high gravel ridge that runs on an east-west axis. The appraisal also notes that the area 'looks in both directions over green belt countryside' and that the elevated position 'allows long range views down to the north over open countryside and shorter range views to the south towards later suburban development'. Key views and vistas identified include: across the valleys into the Conservation Area from Totteridge Common and Totteridge Lane; from Holcombe Hill east towards Highwood Hill; and west from St Josephs Missionary College to undulating land and 1930's suburban estates. To the north of Mill Hill lies **Totteridge Conservation Area**, which also features an area of 'historic urban core' identified within the GLHLC. This is a linear area along Totteridge Common (A5109), which is noted as an important route linking Mill Hill with Whetstone and Barnet within the Totteridge Conservation Area Appraisal Statement (2008). The appraisal also notes that the area is 'set within green fields on three sides, sloping down to Dollis Brook to the north and Folly Brook to the south, giving these parts of the borough a distinctive character' forming part of a 'larger area of open land of high landscape quality, stretching westwards over parts of Harrow Weald' with its 'eastern boundary formed by the suburban development of Totteridge and Whetstone'. In regard to notable views and vistas the appraisal notes 'Views to descending open countryside of the Dollis Brook from the end of Grange Avenue, Horseshoe Lane, Badgers Croft and the rear of properties on Pine Grove and Oaklands Road'.

3.59 Based on the above, the following areas of the Green Belt land within Barnet are considered to make a contribution to Green Belt Purpose D:

- Land that lies within Mill Hill Conservation Area and Totteridge Conservation Area, as well as the surrounding open valleys of the Folly Brook to the south and Dollis Brook which provide a distinctive landscape and visual setting and make a strong contribution to its setting and special character of Mill Hill and Totteridge (parcels BA16, BA17, BA19, BA20, BA21, BA22, BA23, BA24, BA26, BA28, BA29, BA30, BA31, BA32, BA33, BA34, BA45, BA46, BA47 and BA48); whilst areas that are partially developed or comprise sports pitches or form part

of the wider setting make moderate contribution (parcels BA14, BA15, BA25, BA27, BA42, BA43, BA44, BA49, BA62 and BA63).

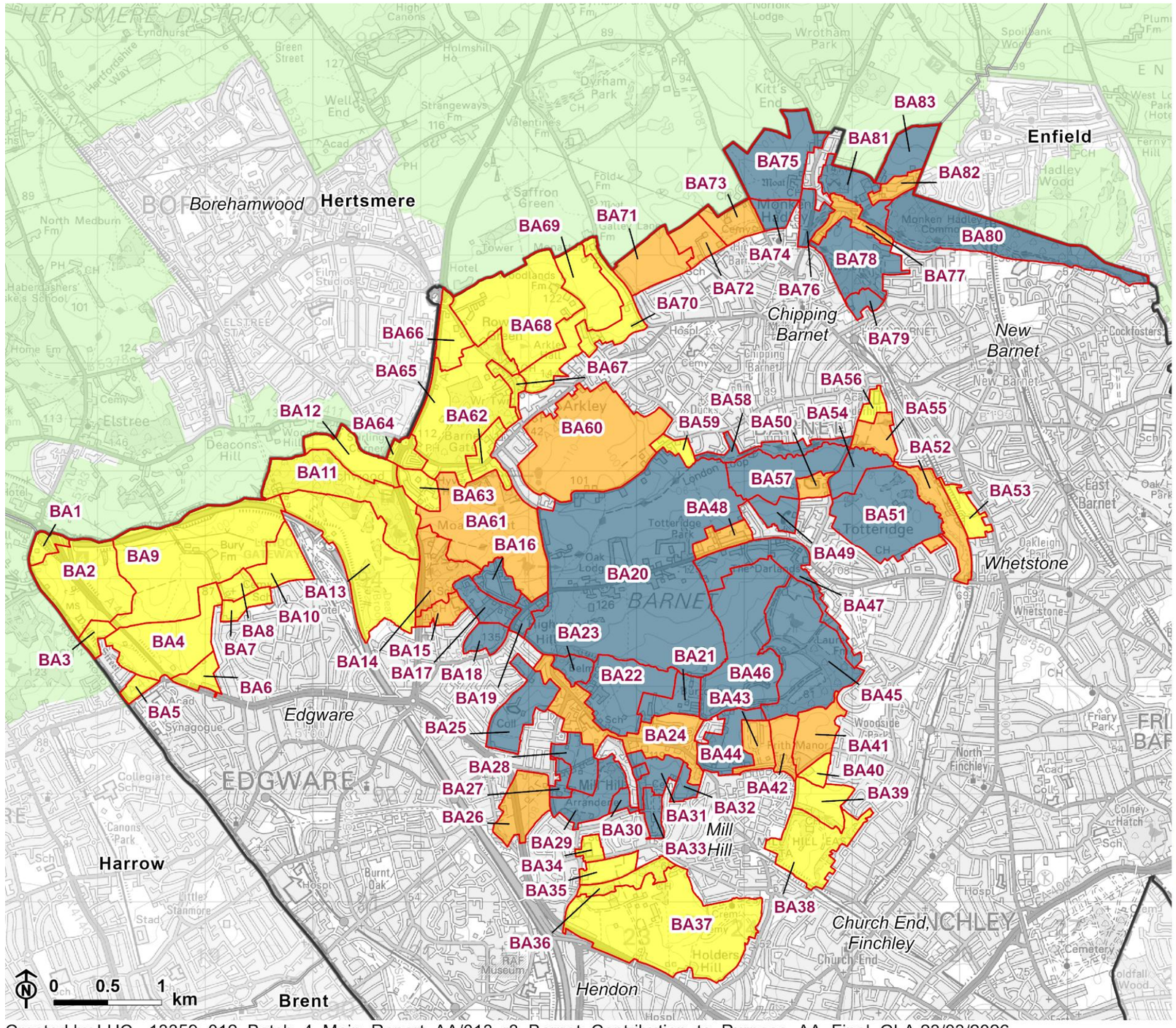
- Land comprises part of the open valley of Dollis Brook, which provides a distinctive landscape setting and makes a strong contribution to the setting and special character of Chipping Barnet and Totteridge (parcels BA21, BA50, BA52, BA55, BA58 and BA59); whilst areas that are partially developed or comprise sports pitches or form part of the wider setting make moderate contribution (parcels BA49, BA51, BA53 and BA56).
- Land that lies within Monken Hadley Conservation Area which provides a distinctive landscape setting to the north-east of Chipping Barnet making a strong contribution to its setting and special character (parcels BA76, BA77, BA78, BA80, BA81, BA82 and BA83); whilst areas that are partially developed or form part of the wider setting make moderate contribution (parcels BA73, BA74, BA75, BA79 and BA84).

3.60 Other areas of the borough are considered to make a weak or no contribution to Purpose D. It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristic.

3.61 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.62 Figure 3.10 illustrates the variations in contribution to Purpose D across Barnet.

Figure 3.10: Contribution to Purpose D – Preserve the setting and special character of historic towns



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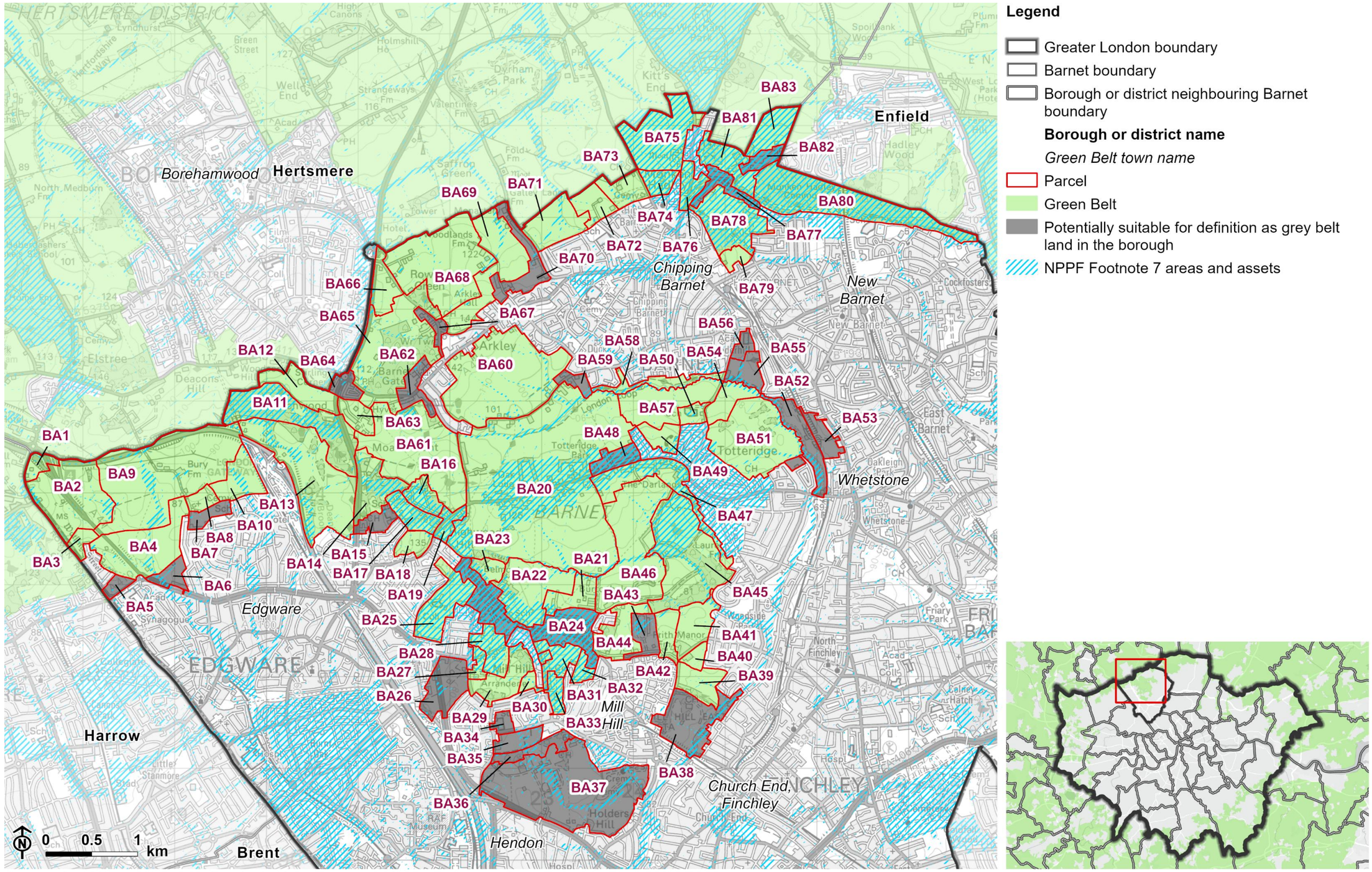
Potential grey belt in the London Borough of Barnet

3.63 Having regard to this definition, the following areas of Barnet are defined as having potential for definition as grey belt land subject to further work by the borough:

- The playing fields north of Spur Road (BA5).
- The southern contained portion of Edgwarebury Park (BA6).
- Edgwarebury Cemetery and Broadfields Primary School playing fields (parcels BA7 and BA8).
- Mill Hill County High School and Playing Fields and the Mill Hill Golf Clubhouse (BA15).
- The substantial development along The Ridgeway (BA24).
- Mill Hill Park (BA26).
- Hendon Cemetery, Hendon Golf Club, Copthall Open Space and sports facilities including the Chase Lodge Playing Fields and Copthall School and Playing Fields (parcels BA34-BA37).
- Finchley Golf Course and the Brent Way, Gordon Road and Fursby Avenue Allotments (BA38).
- Land north of Partingdale Lane and west of Burtonhole Lane (BA43).
- Land north of Totteridge Common Road and west of Grange Avene (BA48).
- Brook Farm Open Space east of Dollis Brook and the Brook Farm Allotments, Totteridge Tennis Courts and adjacent open land (parcels BA52 and BA53).
- Ark Pioneer Academy and Playing Fields and the King George V Playing Fields (parcels BA55 and BA56).
- The Quinta Open Space and developed land north and south of May's Lane (BA59).
- The development along Brickfield Lane, Hendon Wood Lane, Barnet Road and Winifred Close (BA62).
- The development along Rowley Lane (BA67).
- The ribbon development along Arkley Lane and Galley Lane (BA70).
- The substantial development north and south of Stirling Cornet (BA64).
- The development along Hadley Common Road, Hadley Common Green Road and north of Camlet Way (parcels BA77 and BA82).

3.64 Figure 3.11 illustrates the area potentially suitable for definition as grey belt land within Barnet.

Figure 3.11: Green Belt land potentially suitable for definition as grey belt land



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Highest and lowest contributing Green Belt land

3.65 The majority of Green Belt in Barnet makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include:

- The wider open countryside north west of Edgware and south of the M1 makes a strong contribution to a range of purposes:
  - The land south Junction 4 of the M1 makes a strong contribution to Green Belt purposes A, B and C (parcels BA1 and BA2).
  - The open land immediately north of the urban area in between Brockley Hill Road and Edgware Way (BA3) makes a strong contribution to purposes A, B and C.
  - The open countryside containing the northern end of Edgware Park and the fields beyond (BA4), the majority of Edgwarebury Cemetery (BA8) and the land immediately to the east (BA10) makes a strong contribution to purposes A and C.
  - The higher open countryside directly south of the M1 (BA9) and the open countryside east of Edgwarebury Cemetery make a strong contribution to purposes A-C.
- The rolling wooded slopes in between Edgware, Borehamwood and Arkley south of Barnet Road makes a strong contribution to a range of purposes:
  - The central rolling wooded ridge (BA11) and open fields (BA61) make a strong contribution to purposes A, B and C.
  - The parcels immediately to the north and south of these central parcels closer to the urban edges of Mill Hill to the south and Borehamwood to the north (parcels BA12, BA13, BA14, BA63) make a strong contribution to purposes A, B and C.
- The open countryside in between Arkley and Totteridge and Totteridge and Mill Hill makes a strong contribution to a range of purposes:
  - The open slope south of Arkley north of May's Lane makes a strong contribution to purposes A, B and C (BA60).
  - The more open high ground of Highwood Hill north of Nan Clark's Lane makes a strong contribution to purposes A, B, C and D (BA16).
  - The open slopes north and south of the ribbon development along Totteridge Road (BA20) makes a strong contribution to purposes B, C and D.

- The open slopes north of The Ridgeway and south of Folly Brook (parcels BA21 and BA22) make a strong contribution to purposes A, B and D, with BA22 also making a strong contribution to Purpose C. Parcel BA44 makes a strong contribution to purposes C and D.
- The open countryside north of Partingdale Lane and Lullington Garth Road and south of Folly Brook (parcels BA41 and BA42) makes a strong contribution to purposes B and C.
- The open slopes west and south of Totteridge comprised of The Darlands and Windyridge (parcels BA45 and BA46) make a strong contribution to purposes A, B, C and D with the exception of the urban and partially developed edge of Totteridge (BA47) which makes a strong contribution to purposes A, C and D.

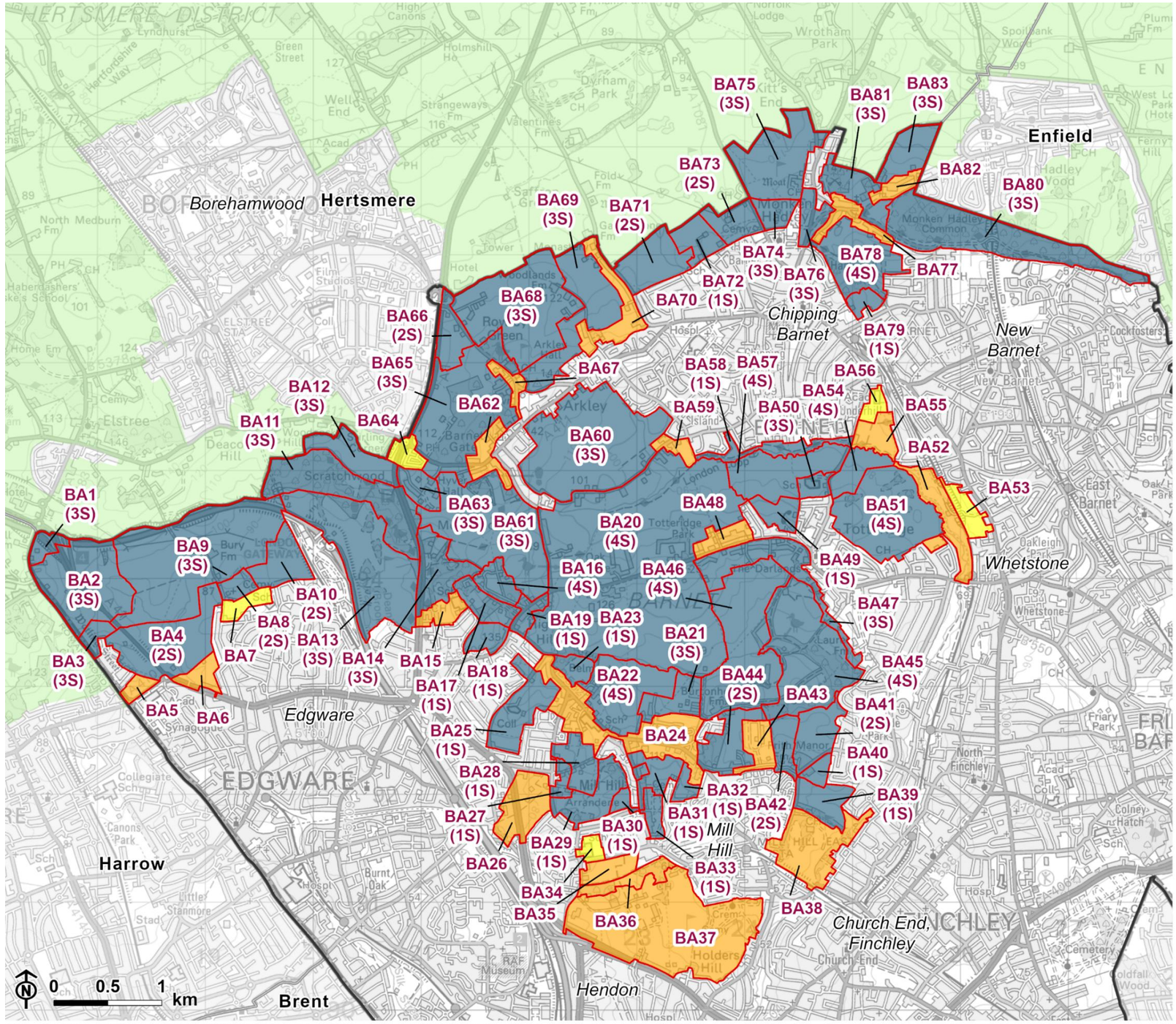
- The open countryside in between Totteridge and Chipping Barnet/New Barnet south of Dollis Brook (parcels BA50, BA51, BA54 and BA57) makes a strong contribution to purposes A, B and C. Parcels BA51, BA54 and BA57 also make a strong contribution to Purpose D.
- The majority of the open countryside in between Arkley and Borehamwood (parcels BA65, BA68 and BA69) make a strong contribution to purposes A, B and C. Parcel BA66 makes a strong contribution to purposes A and B.
- The open countryside north of Chipping Barnet either side of the Byng Road Playing Fields (parcels BA71, BA73 and BA74) make a strong contribution to purposes A and C, with parcel BA75 also making a strong contribution to Purpose D.
- The open countryside surrounding Monken Hadley makes a strong contribution to a range of purposes:
  - The open countryside north west, south and east of the village (parcels BA75, BA76, BA80 and BA81) make a strong contribution to purposes A, C and D.
  - King George's Fields (BA78) makes a strong contribution to purposes A, B, C and D.
  - Monken Hadley Common (BA80) makes a strong contribution to purposes A, C and D.
  - The open countryside north of Camlet Way and south of the Monken Mead Brook (BA83) makes a strong contribution to purposes A, C and D.

3.66 The areas within Barnet that contribute the least to the Green Belt purposes are already largely developed or heavily urbanised by adjacent containing urban areas

(parcels BA7, BA34, BA53, BA56 and BA64). These parcels makes no more than a weak/no contribution to the Green Belt purposes.

3.67 Figure 3.12 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.12: Highest contribution to NPPF Green Belt purposes



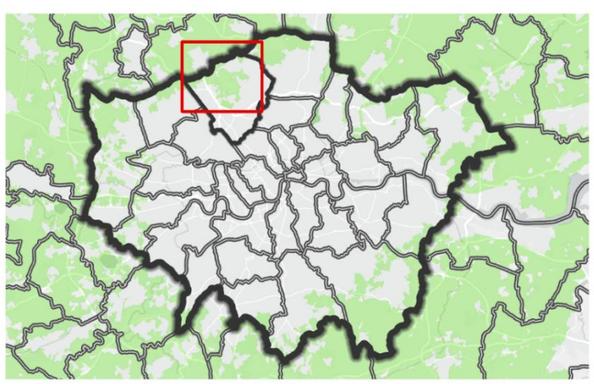
Legend

- Greater London boundary
- Barnet boundary
- Borough or district neighbouring Barnet boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.68 In light of the scale and contiguity of Green Belt land in Barnet and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with Borehamwood would have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Chipping Barnet/New Barnet (via Arkley)/Edgware/Mill Hill merging with Borehamwood.
  - Chipping Barnet/New Barnet (via Arkley) merging with Edgware/Mill Hill.
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release or development of the open land that represents an important part of the distinctive landscape and visual setting to the historic towns of Mill Hill and Totteridge would have a fundamental impact on Purpose D.
- Release or development of the open land that represents an important part of the distinctive landscape and visual setting to the historic towns of Chipping Barnet and Totteridge would have a fundamental impact on Purpose D.
- Release or development of the open land that represents an important part of the distinctive landscape setting to the historic town of Chipping Barnet and Totteridge would have a fundamental impact on Purpose D.

Bexley

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.69 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

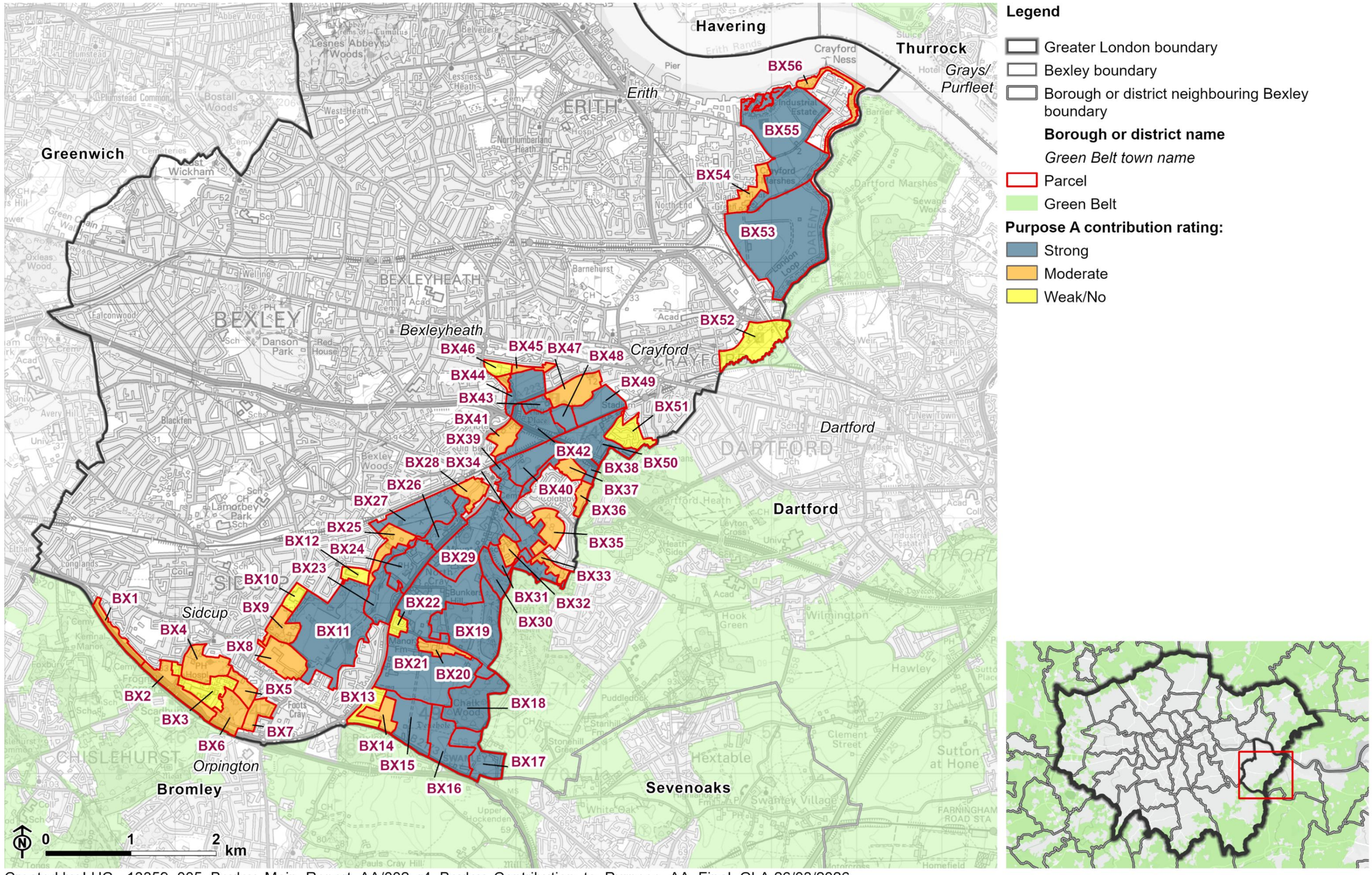
3.70 The majority of land within Bexley makes a strong contribution to Purpose A being adjacent or near to a large built up area and having a strong sense of separation from the urban edge (parcels BX11, BX15-19, BX21, BX23-27, BX29-BX31, BX34, BX38-BX40, BX42-BX44, BX48, BX49, BX53 and BX55). Development in these locations would expand the large built up area into the open countryside often breaching retaining physical features in reasonable proximity to the urban edge and would therefore have a notable incongruous impact on the urban pattern. In addition, in some locations, development would also significantly weaken the sense of separation between Greater London and surrounding satellite settlements (parcels BX29, BX38-BX40, BX42, BX50 and BX55), with the risk of their merging increasing their combined sprawling influence.

3.71 Where the land is partially developed, more contained and/or has some notable relationship with the large built-up area it makes a more moderate contribution to Purpose A (parcels BX1, BX2, BX4-BX9, BX14, BX20, BX25, BX28, BX32, BX33, BX35-BX37, BX41, BX45, BX47, BX54 and BX56). These areas, whilst contained, maintain some sense of separation from urban areas and function to inhibit notable inward sprawl from the large built up area.

3.72 Green Belt land that contains significant areas of development and/or is notably contained (parcels BX3, BX10, BX12, BX13, BX22, BX46, BX51 and BX52) makes a weak/no contribution to Purpose A.

3.73 Figure 3.13 illustrates the variations in contribution to Purpose A across Bexley.

Figure 3.13: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.74 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.75 Land that makes a strong contribution to Purpose B form substantial parts of gaps between towns and maintains a general strong sense of separation and lack of influence from urban development. This includes land within the:

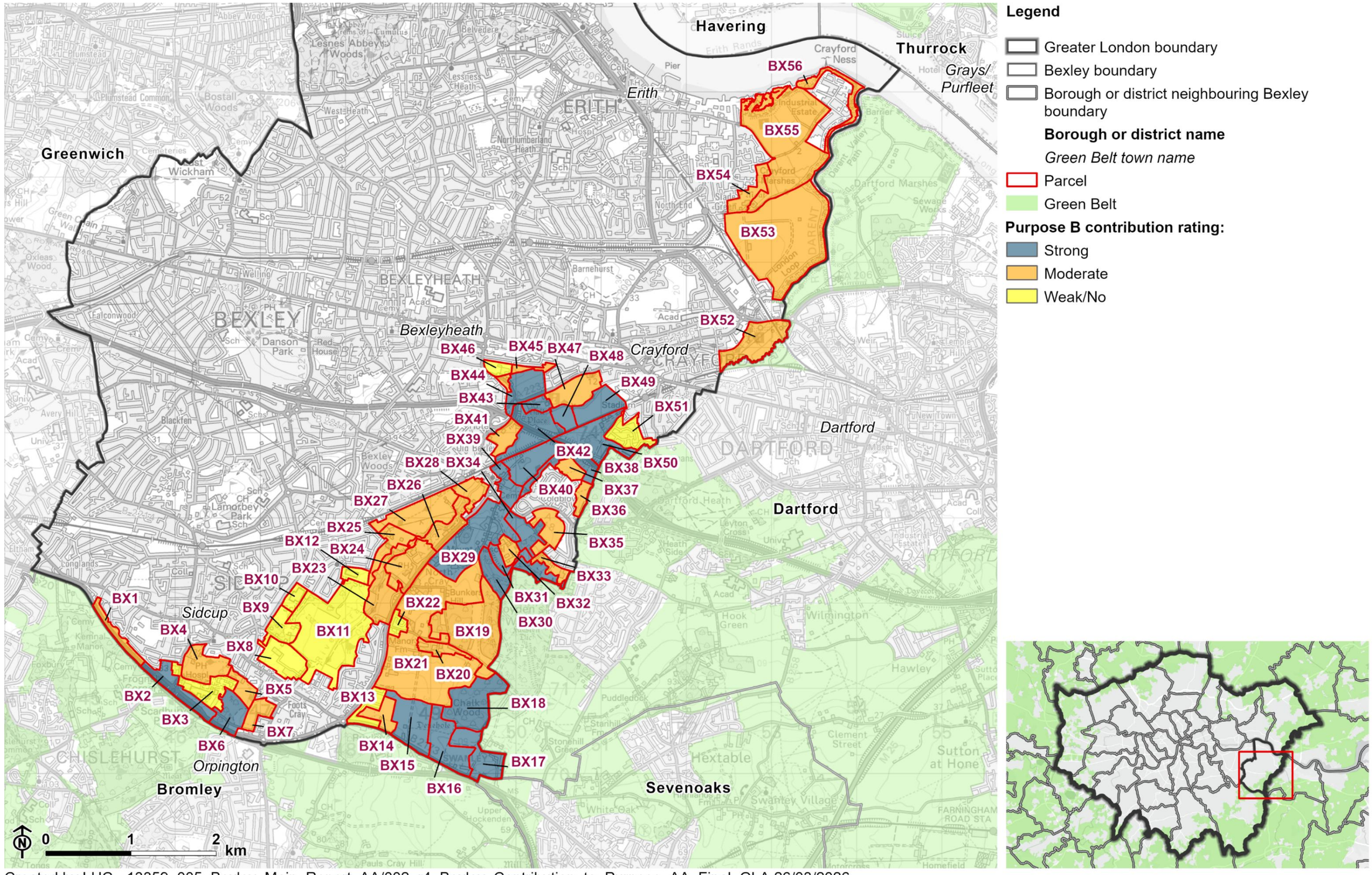
- Fragile gap between Bromley (via Chislehurst), Orpington and Sidcup (parcels BX2 and BX6).
- more moderate gap between Sidcup (via Foots Cray) and Swanley (parcels BX15-BX18).
- Fragile gap between Bexleyheath (via Old Bexley) and Dartford and Swanley (via Coldblow and Joyden's Wood) (parcels BX29-BX31, BX34 and BX35)
- Fragile gap between Bexleyheath (via Old Bexley) and Crayford/Dartford and Swanley (via Coldblow/Joyden's Wood) (parcels BX38-40, 42-44 and 48-50).

3.76 Land that makes a weak/no contribution to Purpose B include land that is particularly or largely developed (parcels BX3, BX13, BX22 and BX51) and/or contained and strongly influenced by the surrounding urban area (parcels BX8-BX12 and BX46).

3.77 The remaining areas make a moderate contribution to this purpose because they represent less substantial parts of gaps between towns by virtue of the wider nature of the gaps and/or being more contained or urbanised/developed. These areas still have some openness and are sufficiently distinct that they still play some separating role between neighbouring towns. For example, Parcel BX52 represents the only remaining open land between Crayford and Dartford; however, its significance is limited by the fact that the neighbouring towns are already significantly merged to the west and development in the east of the area in between the railway line and Stanham River almost merge the towns in the east, such that what open land remains only plays some role in maintaining separation.

3.78 Figure 3.14 illustrates the variations in contribution to Purpose B across Bexley.

Figure 3.14: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.79 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

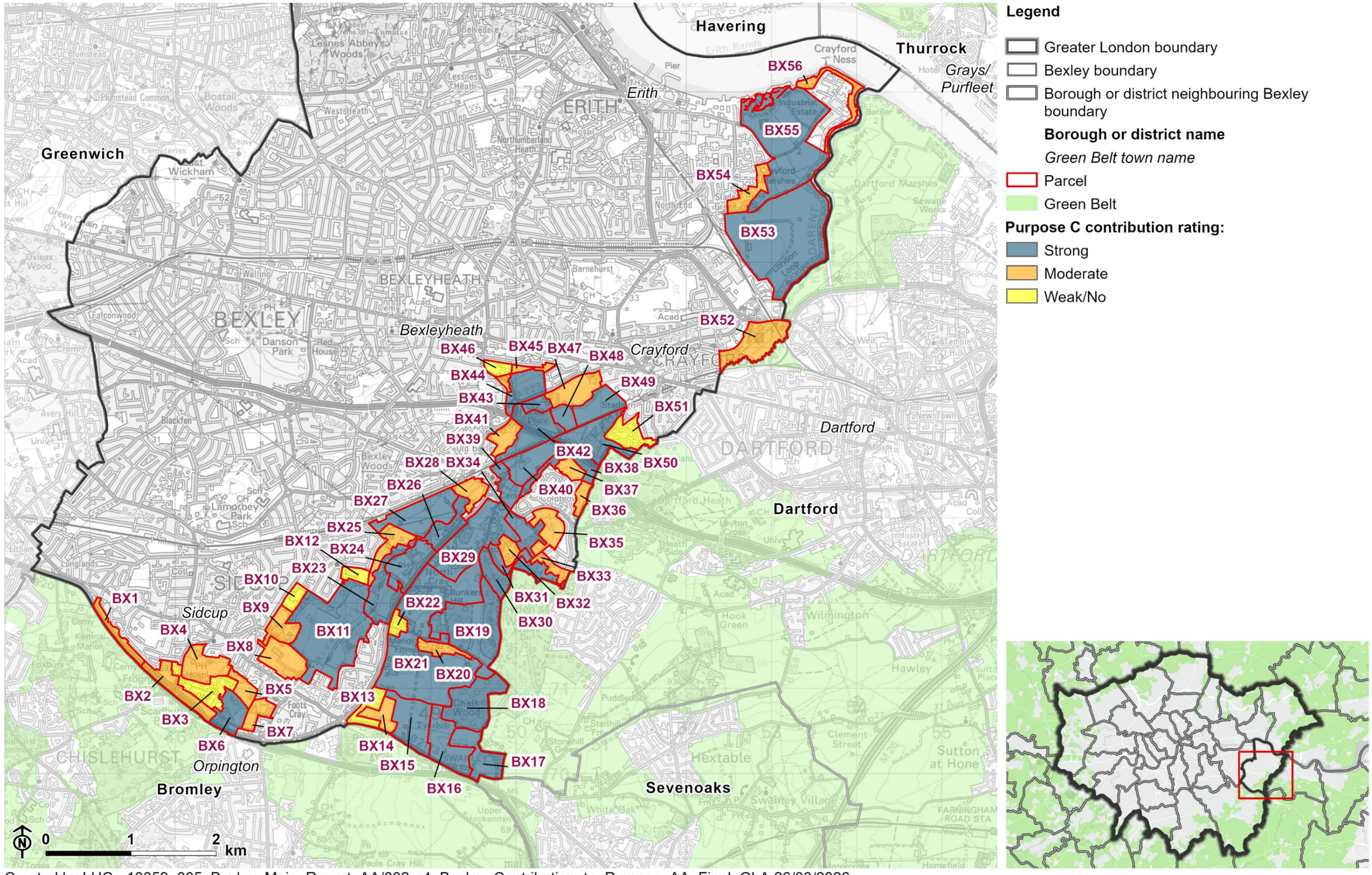
3.80 The majority of the Green Belt land in the borough is open and has a clear connection with the wider countryside and therefore makes a strong contribution to Purpose C (parcels BX6, BX11, BX15-BX19, BX21, BX23, BX24, BX26, BX27, BX29-BX31, BX34, BX38-BX40, BX42-BX44, BX48-BX50, BX53 and BX55). If development were to take place in these locations, the surrounding Green Belt would be subject to a stronger urbanising influence than is currently the case.

3.81 Green Belt land that contains significant areas of development and are significantly contained by the urban area limiting their relationship with the wider countryside make a weak/no contribution to Purpose C (parcels BX3, BX10, BX12, BX13, BX22, BX46 and BX51).

3.82 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where land is partially developed with some notably openness and relationship with the wider countryside (parcels BX20 and BX32); or where land is open but has land uses associated with the urban area rather than the open countryside, such as sports playing fields or allotments (parcels BX2, BX5, BX8, BX9, BX41 and BX47); and/or where land is largely open but has a clearer association with the urban area and/or a limited relationship with the wider countryside such that development would not have a notably wider encroaching influence (parcels BX1, BX4, BX7, BX25, BX28, BX33, BX35-37, BX45, BX52, BX54 and BX56).

3.83 Figure 3.15 illustrates the variations in contribution to Purpose C across Bexley.

Figure 3.15: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.84 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to nine settlements large enough to be considered towns in Green Belt terms – Bexleyheath, Bromley, Crayford, Dartford, Erith, Grays (including Purfleet and West Thurrock), Orpington/Petts Wood, Sidcup and Swanley.

3.85 Dartford and Erith have historic cores protected by conservations areas, although these are located deep within the urban area and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt within Bexley. The areas are focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points).

3.86 Bromley and Orpington/Petts Wood are located within the neighbouring London Borough of Bromley to the south-west, at such a distance that Green Belt land within Bexley makes little to no contribution to its setting and special character.

3.87 Swanley (within Sevenoaks District) is not considered to be a historic town. The settlement is predominantly a suburban area developed in the late 19th and/or early 20th centuries following the arrival of the railways and or as satellite towns to alleviate housing shortages in Inner London. It lacks an identified ‘historic urban core’ identified within the Greater London Historic Landscape Characterisation (GLHLC, 2021) and do not contain any conservation area designations.

3.88 However, the following towns have conservations areas which are located in relatively close proximity to Green Belt land:

- For most of its history, Bexleyheath was heath land. Watling Street, a Roman road which connected Londinium (London) to Dubris (Dover), still marks the spine of Bexley new town. However, in the southern part of Bexleyheath lies the remnant village of Bexley, which is today protected by **Old Bexley Conservation Area**. The Old Bexley Conservation Area Appraisal (2009) notes that the areas special character is derived partly from ‘the setting of the village on the edge of the Metropolitan Green Belt’ and ‘the semi-rural atmosphere around St Mary’s Church and The Manor House’, as well as ‘the picturesque area of the River Cray and the old ford’.
- Crayford is located on the River Cray, occupying the floodplain and valley sides. There is evidence of settlement in Crayford going back to the Iron Age and

Roman period and the town is mentioned in the Domesday Book of 1086. The **Iron Mill Lane Conservation Area** covers part of the historic core of the town, the conservation area appraisal for which (2008) states that 'the topography of the conservation areas on a hill top with commanding views over Crayford and the River Cray floodplain, is of crucial importance to the areas special character and appearance'.

- Grays is located to the east of Bexley in the Unitary Authority of Thurrock. The town is located on the north bank of the River Thames with the historic core indicated by a cluster of listed buildings including the Grade II* Church of St Mary the Virgin. Purfleet is also located on the north bank of the River Thames to the west of Grays with **Purfleet Conservation Area** and several listed buildings, including the Grade I listed Government Powder Magazine, indicating the historic core of the town. The setting of both Grays and Purfleet is focused primarily on the River Thames to the south, with Green Belt land within Bexley to the west located at some distance and playing little to no contribution to its setting and special character. Whilst Green Belt land in Bexley is located at greater proximity to Purfleet, the land visible from the town at Crayford Ness is largely developed.
- Sidcup originated as a tiny hamlet on the road from Maidstone to London. It was initially known as Foots Cray, but by 1925 the urban district and the parish had been renamed Sidcup. It remained a largely rural area until the late 19th and early 20th centuries. **The Green Conservation Area** protects a remnant historic part of the town and includes some of Sidcup's oldest surviving buildings, including two former country houses, a church and a timber-framed house. The Green Conservation Area Appraisal (2009) notes that 'these are important landmarks that can be viewed across the public green open spaces', and that 'open spaces include Sidcup Green, which forms a setting to the country houses and a link towards countryside to the east'. In regard to setting the appraisal states that the area 'retains a tranquil charm that evokes a sense of Bexley prior to interwar suburban development when it was characterised by low hills and river valleys'. To the north of The Green lies the **Halfway Street Conservation Area** which protects another remnant village core within the settlement containing some of the earliest surviving buildings in the area. However, this area is surrounded by later development which means that Green Belt land to the east and south-east makes no contribution to the areas setting and special character. Elsewhere the town has a mixture of large Victorian and Edwardian properties alongside typical 1930s suburbia. There are several other conservation areas within Sidcup which relate to later periods of development with generally suburban settings, such **Christ Church**, **Longlands Road**, **Old**

Forge Way, **The Hollies**, **The Oval** and **Willersley Avenue/Braundton Avenue**.

3.89 The Grade II **Foots Cray Palace Registered Park and Garden** comprises an area of 18th landscape parkland. The listing for the park notes that it lies between the old settlements of Foots Cray (now Sidcup) and North Cray, but there is no reference to the park contributing to the setting and special character of the towns.

3.90 Based on the above, the following areas of the Green Belt land within Bexley are considered to make a contribution to Green Belt Purpose D:–

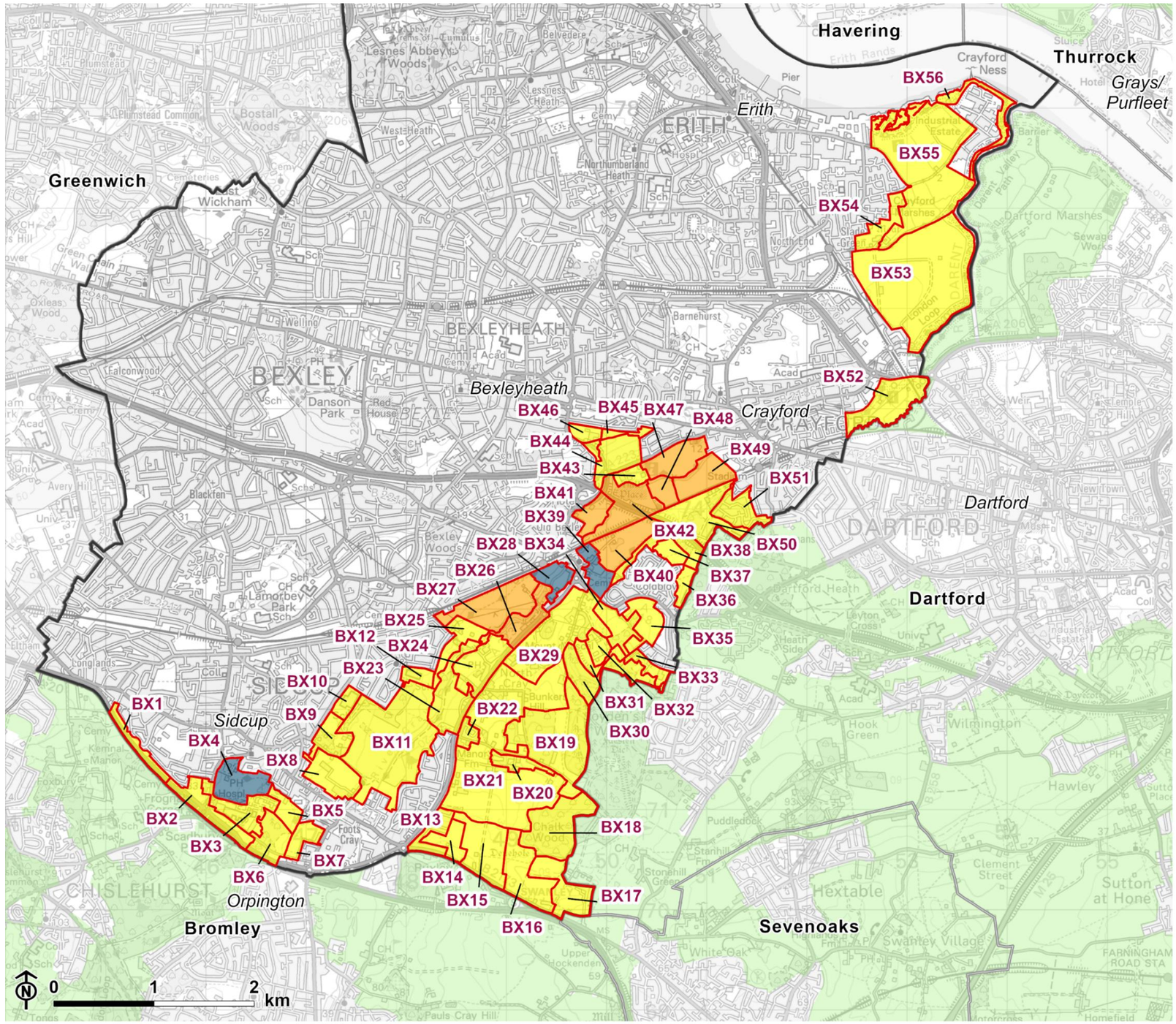
- Sidcup Green and surrounding open green spaces, forming an immediate rural setting to a remnant historic part of Sidcup (BX4) makes a strong contribution.
- Land that lies partially within and to the immediate east and west of Old Bexley Conservation Area, which forms part of the historic town of Bexleyheath (parcels BX28 and BX39) makes a strong contribution.
- Land along the valley of the River Cray and its floodplain forms an important open setting to the west and east of Old Bexley (parcels BX26, BX27, BX40-BX42) makes a moderate contribution.
- Land along the valley of the River Cray and its floodplain forms an important open setting to the west of Crayford (parcels BX42, BX47-BX49) makes a moderate contribution.

3.91 Other areas of the borough are considered to make a weak/no contribution to Purpose D. It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristic.

3.92 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.93 Figure 3.16 illustrates the variations in contribution to Purpose D across Bexley.

Figure 3.16: Contribution to Purpose D – Preserve the setting and special character of historic towns

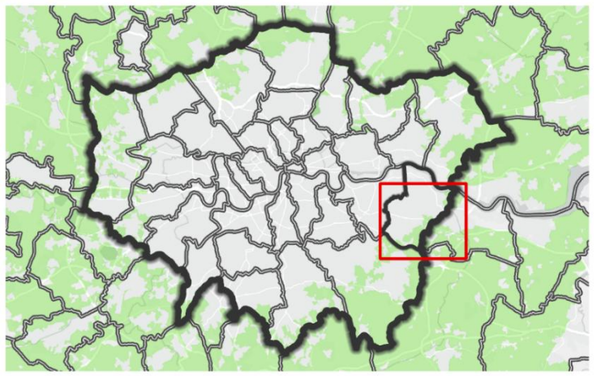


Legend

- Greater London boundary
- Bexley boundary
- Borough or district neighbouring Bexley boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose D contribution rating:

- Strong
- Moderate
- Weak/No



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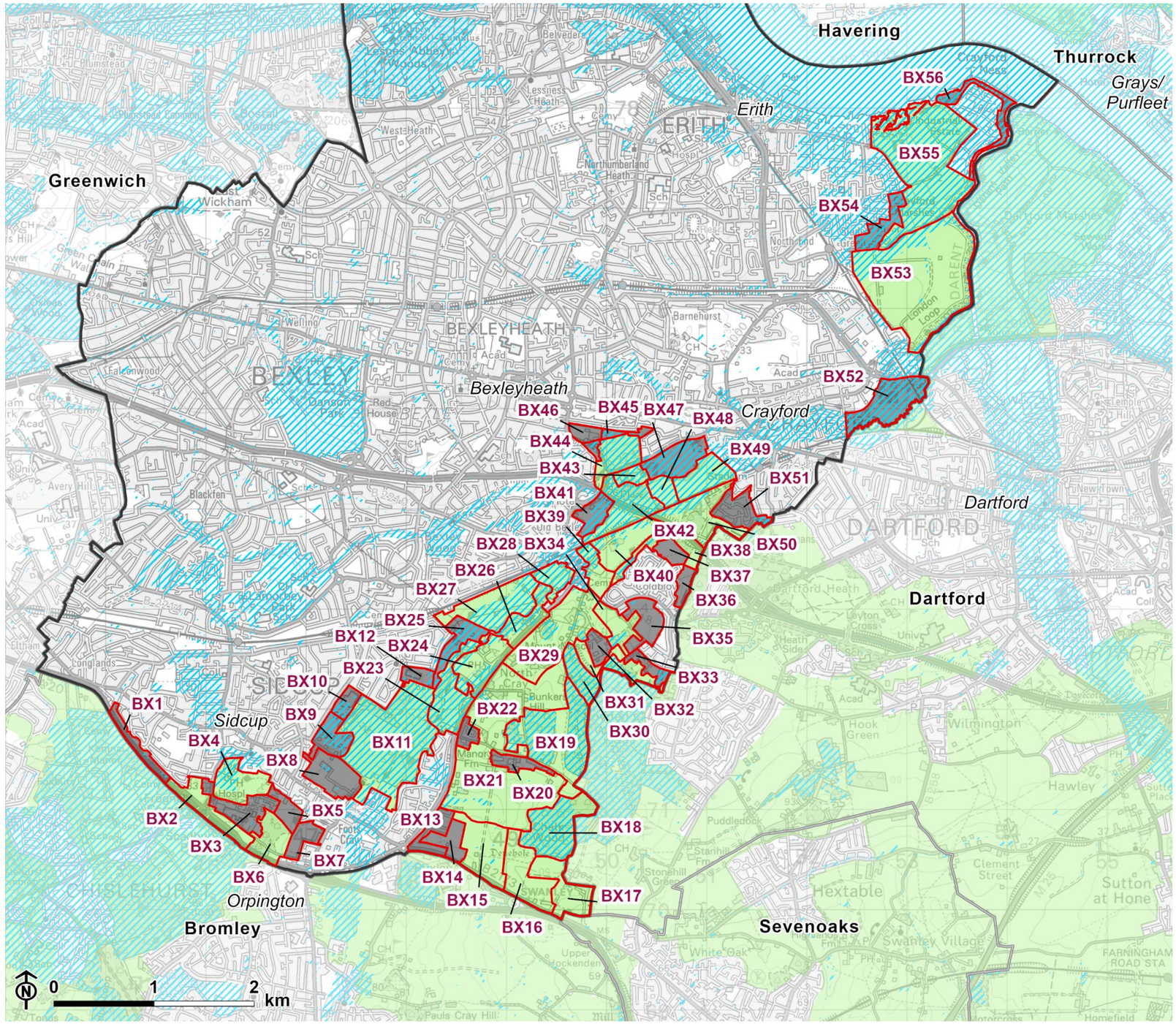
Potential grey belt in the London Borough of Bexley

3.94 Having regard to the definition set out in the NPPF, the following areas of Bexley are defined as having potential for definition as grey belt land subject to further work by the borough:

- Land south of Sidcup/Foots Cray (parcels BX1, BX5 and BX7).
- Land east of Sidcup and north of Foots Cray (parcels BX8-BX10 and BX12).
- Land east of Foots Cray (parcels BX13, BX14, BX20, BX22 and BX25).
- Land on the southern and eastern edges of Coldblow (parcels BX32, BX33, BX35-BX37).
- Land on the southern edge of Bexleyheath and Old Bexley (parcels BX41, BX45-BX47).
- The developed land at the western end of Dartford (BX51).
- Land in between Crayford and Dartford (BX52).
- Land on the eastern edge of Erith and western edge of Crayford Ness (parcels BX54 and BX56).

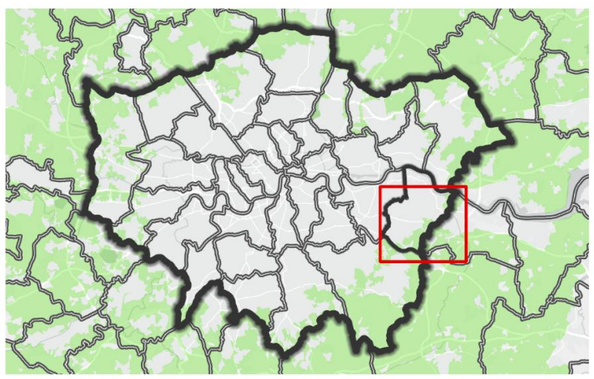
3.95 Figure 3.17 illustrates the area potentially suitable for definition as grey belt land within Bexley.

Figure 3.17: Green Belt land potentially suitable for definition as grey belt land



Legend

- Greater London boundary
- Bexley boundary
- Borough or district neighbouring Bexley boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets



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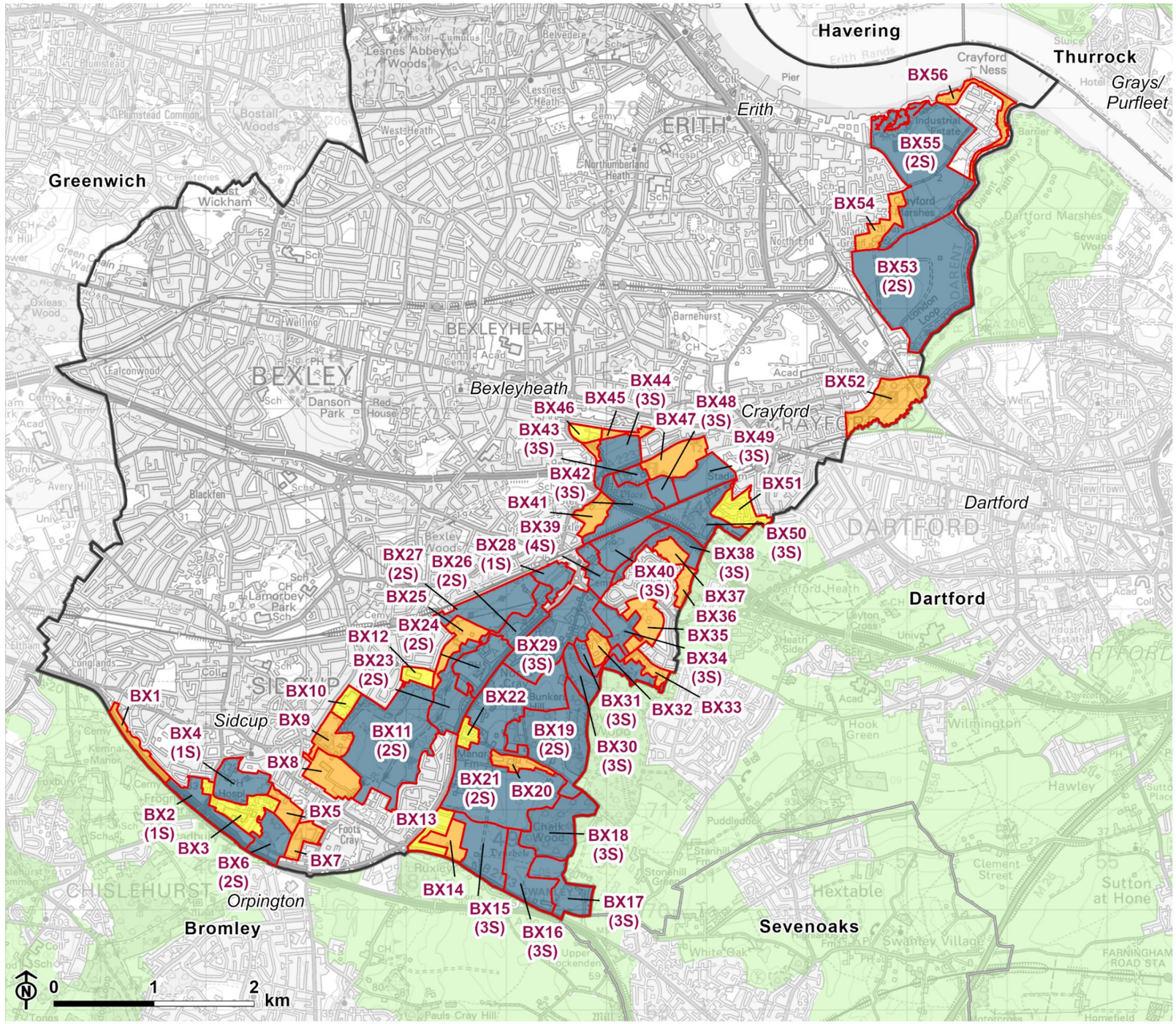
Highest and lowest contributing Green Belt land

3.96 The majority of the Green Belt in Bexley makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include the open land:

- To the south east of Queen Mary's Hospital where land makes a strong contribution to purposes B and C (BX6).
- to the east of Sidcup and west of Crays Foot where land makes a strong contribution to purposes A and C (BX11).
- to the east of Crays Foot where land makes a strong contribution to purposes A and C (parcels BX15-BX18 and BX21), with the majority of the parcels (parcels BX15-BX18) also making a strong contribution to Purpose B.
- to the east of Sidcup and west of Coldblow and Maypole where land makes a strong contribution to purposes A and C (parcels BX19, BX23, BX24, BX26, BX27, BX29-BX31 and BX34), with some parcels (parcels BX29- BX31 and BX34) also making a strong contribution to Purpose B.
- between Bexleyheath/Old Bexley, Crayford and Coldblow and Maypole where land makes a strong contribution to purposes A, B and C (parcels BX38-BX40, BX42-BX44, BX48-BX50). Parcel BX39 also makes a strong contribution to Purpose D.
- to the east of Erith where land makes a strong contribution to purposes A and C (parcels BX53 and BX55).

3.97 Figure 3.18 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.18: Highest contribution to NPPF Green Belt purposes



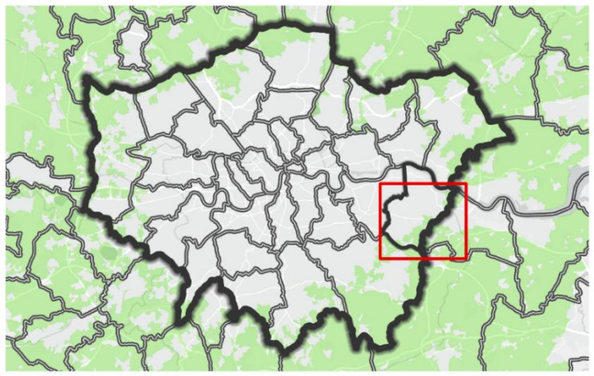
Legend

- Greater London boundary
- Bexley boundary
- Borough or district neighbouring Bexley boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.98 In light of the scale and contiguity of Green Belt land in Bexley and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Bromley (via Chislehurst), Orpington and Sidcup.
  - Orpington and Sidcup (via Foots Cray) and Swanley.
  - Bexleyheath (via Old Bexley), Crayford/Dartford and Swanley (via Coldblow and Joyden's Wood).
- Release and development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release and development of Sidcup Green and adjacent open spaces that form an immediate rural setting to historic Sidcup would have a fundamental impact on Purpose D.
- Release and development of the River Cray valley that form an immediate rural setting to historic Bexleyheath (Old Bexley) would have a fundamental impact on Purpose D.

Bromley

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.99 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

3.100 All Green Belt land within the Bromley is considered to be sufficiently near to Greater London and the surrounding large built-up areas of Biggin Hill, New Addington and Swanley (also defined as towns) to be considered to play some role in preventing their individual and/or combined sprawl. Consequently, all open and

uncontained Green Belt land within Bromley is considered to make a strong contribution to Purpose A.

3.101 Those areas that make a strong contribution are located to the east (parcels BR127, BR144 and BR156) and south of Orpington (parcels BR93 and BR107), south and south east of West Wickham (BR60, BR65 and BR66) and around Biggin Hill (parcels BR73, BR81 and BR83). These open areas have a very strong sense of separation from the urban area with no notable urbanising influence from it. The development of these areas would have an incongruous impact on the urban pattern by extending large built-up areas out into the open countryside beyond notable containing and retaining physical features, weakening the wider countryside.

3.102 There are a couple of examples of land where, while they are more contained, their release would result in the merging of villages with the large built up area, forming an incongruous pattern of development. This includes land lying in between West Wickham/Orpington and Keston (parcels BR55 and BR57), land between Orpington and Pratts Bottom (parcels BR118, BR121 and BR126) and Biggin Hill and South Street (parcels BR84 and BR88). These areas also rate strongly to Purpose A.

3.103 Some areas directly abutting urban areas make a strong contribution to Purpose A. The most notable large blocks of strongly contributing parcels in such locations include the large open areas of contained Green Belt land in between Orpington and Bromley (including Chislehurst), covering parcels BR3-BR5, BR9, BR11, BR14, BR25, BR32, BR34, BR36, BR41, BR44, BR46 and BR47. Smaller isolated clusters lie to the south east of New Addington, around Biggin Hill and south and east of Orpington.

3.104 There are a number of areas that make a more moderate contribution to Purpose A. Many of these lie within areas with a physical and visual connection with the large built-up area, by virtue of their urban containment and or retention by physical features in close proximity to the urban edge but are still sufficiently open as to inhibit notable sprawl of the large built up area. The most notable clusters of moderately performing parcels include parcels BR27, BR28, BR33, BR42, BR43, BR45, BR51-BR53, BR59, BR100, BR139 and BR142.

3.105 Inappropriate development within the Green Belt lowers contribution to Purpose A. The small isolated villages in the open countryside generally make a moderate contribution to Purpose A (parcels BR87, BR92, BR103, BR109, BR114, BR117 and BR124). The significant areas of washed over development immediately adjacent to the borough's large built-up areas make a weak/no contribution to Purpose A: Chislehurst School for Girls (BR10), Midfield Primary School (BR15), former Marjorie McClure School (BR18), Bromley High School (BR26), Trinity Primary School and Bishop Justus School (BR39), Ravens Wood School (BR50),

Charles Darwin School and Biggin Hill Primary School (BR96) and Farnborough Primary School and neighbouring development (BR112). In addition, the dense residential development just to the west of Biggin Hill airport (BR76) and the land containing buildings associated with the airport (BR99), as well as land around Layhams Road at Keston Mobile Park (BR71).

3.106 Open Green Belt land that is significantly contained and urbanised by urban areas, or inappropriate development washed over by the Green Belt also make a weak/no contribution to Purpose A by virtue of their stronger association with the urban areas: former Majorie McClure School playing fields (BR7), Chislehurst Golf Course (BR22), Chislehurst Cricket Club (BR23) and St Mary Cray Recreation Ground (BR140).

3.107 Figures 3.19 and 3.20 illustrate the variations in contribution to Purpose A across Bromley.

Figure 3.19: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas: North

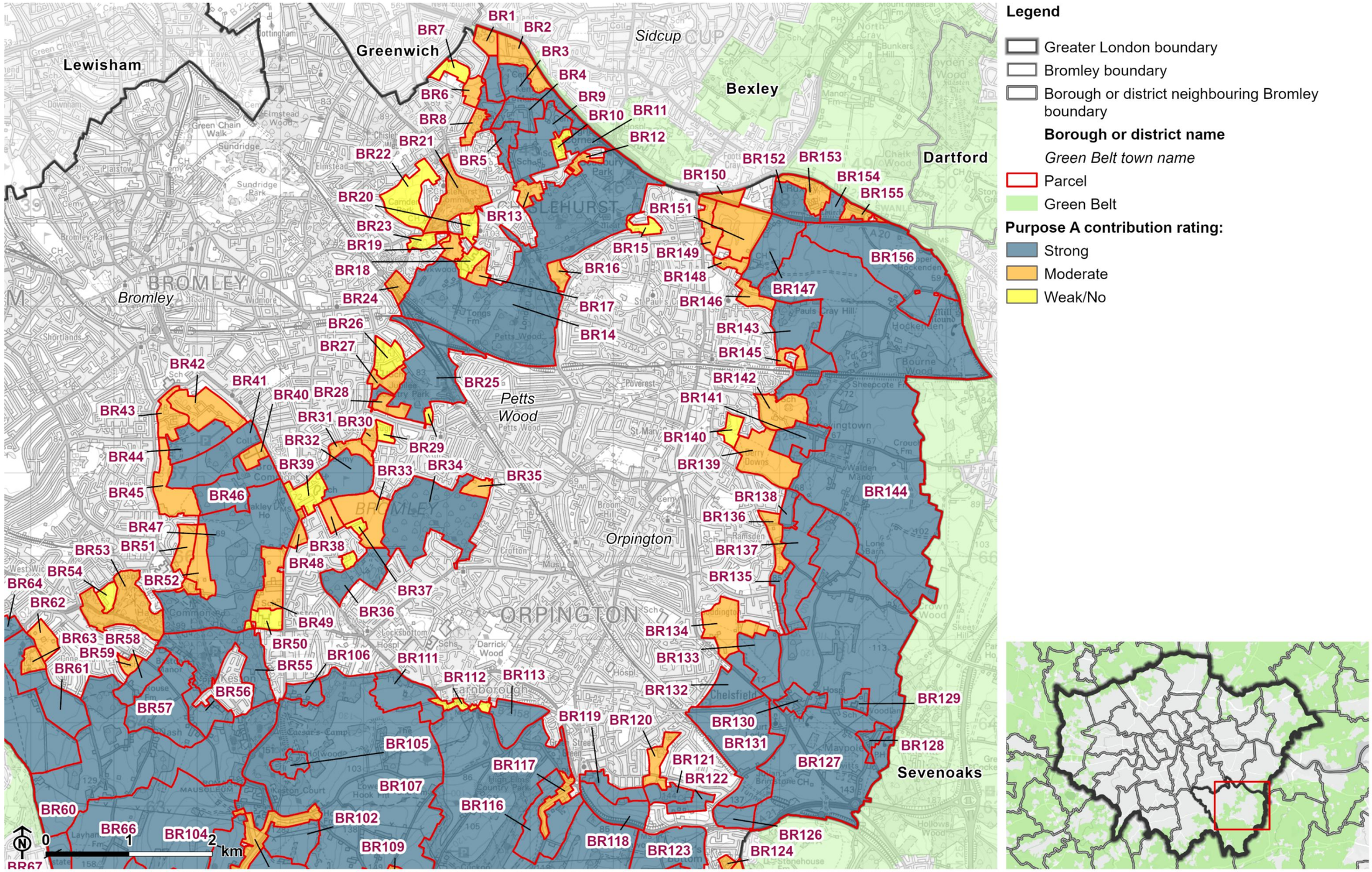

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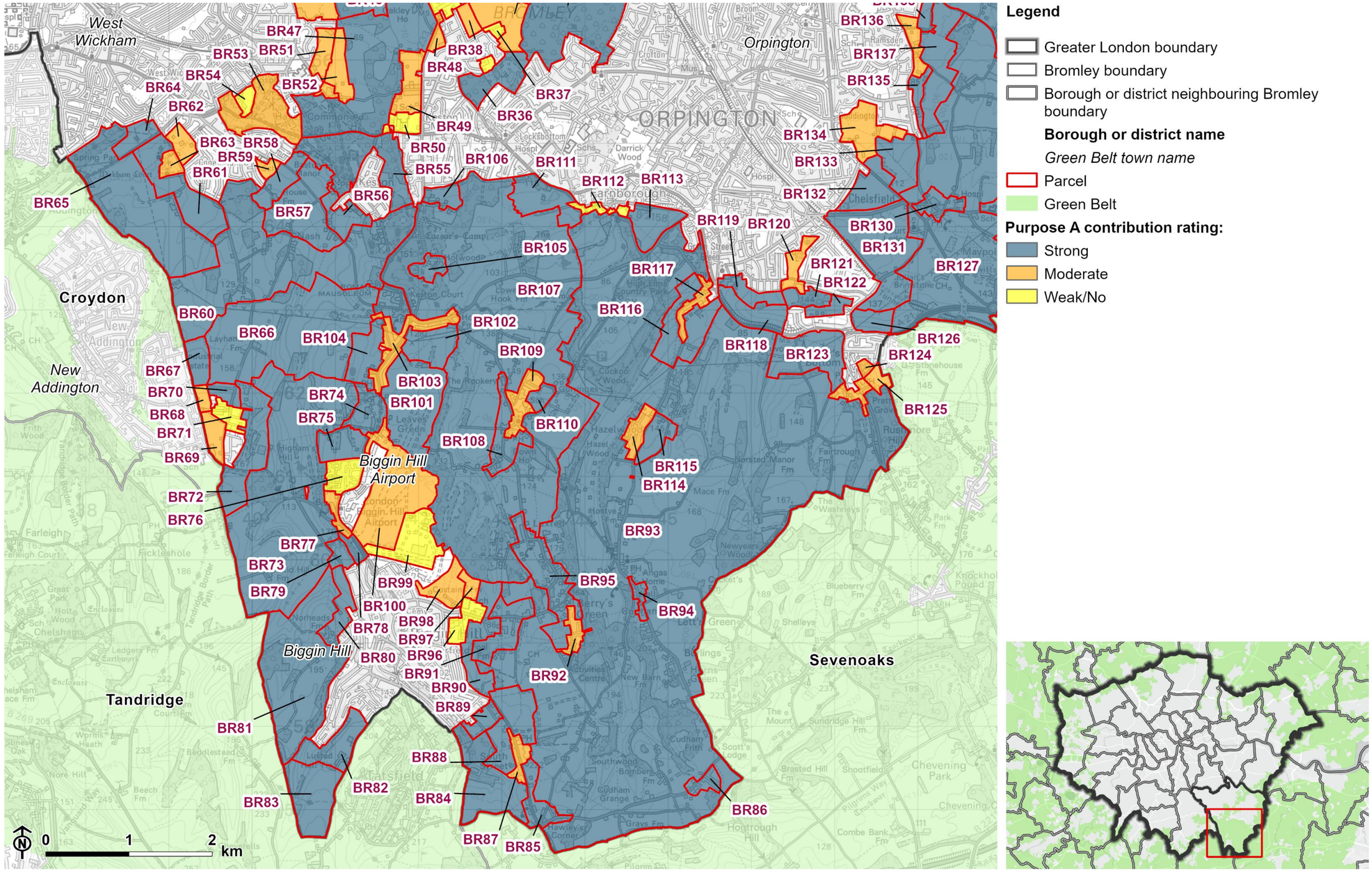
Figure 3.20: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas: South



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.108 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.109 The areas of land that make a strong contribution to this purpose are located in, and form a substantial part of the fragile gap between the towns of Petts Wood/Orpington and Bromley (parcels BR14, BR25, BR30, BR32, BR47 and BR55) the weakening of which would result in the loss of visual separation. This open and undeveloped land is not subject to any significant urbanising influences and plays a key role in maintaining the towns physical and visual separation. This is also the case for parts of the land that lie between Bromley/West Wickham and New Addington to the south west (BR65).

3.110 Other areas of land make a strong contribution where:

- Forms a substantial part of a remnant gap between neighbouring towns and/or the presence of some urbanising influence, for example between Bromley (via Chislehurst) and Sidcup, which are already merged to the north (parcels BR2-BR5, BR9, BR11 and BR12) and between Orpington and Sidcup (via Foots Cray), which are already merged to the north west (BR147 and BR151), between Bromley and Petts Wood/Orpington at the edges of Jubilee Country Park (parcels BR27 and BR28), Petts Wood FC, Bromley Rugby Club (BR52), between Bromley/West Wickham and New Addington just to the east of Coney Hall (parcels BR61 and BR64) and along the urban edges in the gap between Coney Hall and Keston (parcels BR56 and BR58).
- Containment by the urban area of Greater London, while still maintaining a strong sense of separation and lack of influence from urban development. For example Chislehurst Common (parcels BR20 and BR21) which maintains separation between Bromley the intervening settlement of Chislehurst in the fragile gap towards Orpington and Parkfield Recreation Ground (BR31).

3.111 Other land that makes a strong contribution is peripheral to the narrow and fragile gaps between Bromley and Orpington (BR46) and between Bromley and Orpington and New Addington (BR60) and therefore is still judged to represent a substantial part of it, the development of which would likely result in the loss of visual separation. The land between Biggin Hill and New Addington (parcels BR72, BR73, BR75, BR78 and BR79) makes a strong contribution by virtue of its relatively narrow distance in combination with its topography and connecting features which maintain separation and add to its substance, the weakening of which through development would likely result in the loss of visual separation. The least urbanised land along the

connecting A20 in between Orpington/Sidcup and Swanley (parcels BR154 and BR156) also makes a strong contribution to Purpose B.

3.112 The main areas of Green Belt that make a moderate contribution lie in the more remote and wider parts of the gaps between Orpington and Swanley (parcels BR143 and BR144) and Orpington and Biggin Hill (parcels BR100-BR102, BR104-BR108, BR111 and BR112) where the gap is wide enough that there would be the potential for some smaller areas of development without losing visual separation. The notably contained and/or developed parcels peripheral to the gap between Bromley and Orpington also make a more moderate contribution (parcels BR329, BR33, BR34, BR36, BR38, BR39, BR40-BR45, BR49, BR51, BR53 and BR54). Parcels BR40-BR45 also perform a moderate role in maintaining what remains of the remnant separation between West Wickham and Bromley. Although more central parcels BR49 and BR51 make a moderate contribution due their respective connections to Orpington and West Wickham and the separating features in the wider gap between the towns. There are also two areas of land that make a moderate contribution that are peripheral to the gap between Biggin Hill and New Addington (parcels BR66 and BR81).

3.113 The land making a moderate contribution within the gap between Petts Wood/Orpington and Bromley is generally peripheral to the narrow gap between the towns, but more contained by them, meaning smaller areas of development would not result in the loss of visual separation (parcels BR52, BR43, BR42, BR41, BR40, BR31, BR34 and BR36).

3.114 The Green Belt to the south of Biggin Hill and south east of Orpington, and along the boundary with Sevenoaks District makes a weak/no contribution to this purpose (parcels BR82-BR98, BR112-BR142). These areas of land do not lie in a notable gap between neighbouring towns.

3.115 Other land that makes a weak/no contribution to Purpose B includes land that is subject to a significant urbanising influence, either from washed over inappropriate development on the land itself or through containment by the urban edge such that it plays no role in maintaining any separation between towns. Examples of contained and developed land that makes a weak/no contribution to this purpose include: Chislehurst School for Girls (BR10), Midfield Primary School (BR15), former Marjorie McClure School (BR18), Chislehurst Golf Course (BR22), Bromley High School (BR26), Petts Wood Recreation Ground (BR35), Ravens Wood School (BR50), the woodland clearing north of Coney Hall (BR54), the dense residential development just to the west of Biggin Hill airport (BR76) and the land containing buildings associated with the airport (BR99), as well as land around Layhams Road at Keston

Mobile Park (BR71), and the villages in the gap between Orpington and Biggin Hill (parcels BR103 and BR109).

3.116 Figures 3.21 and 3.22 illustrate the variations in contribution to Purpose B across Bromley.

Figure 3.21: Contribution to Purpose B – Prevent the merging of neighbouring towns: North

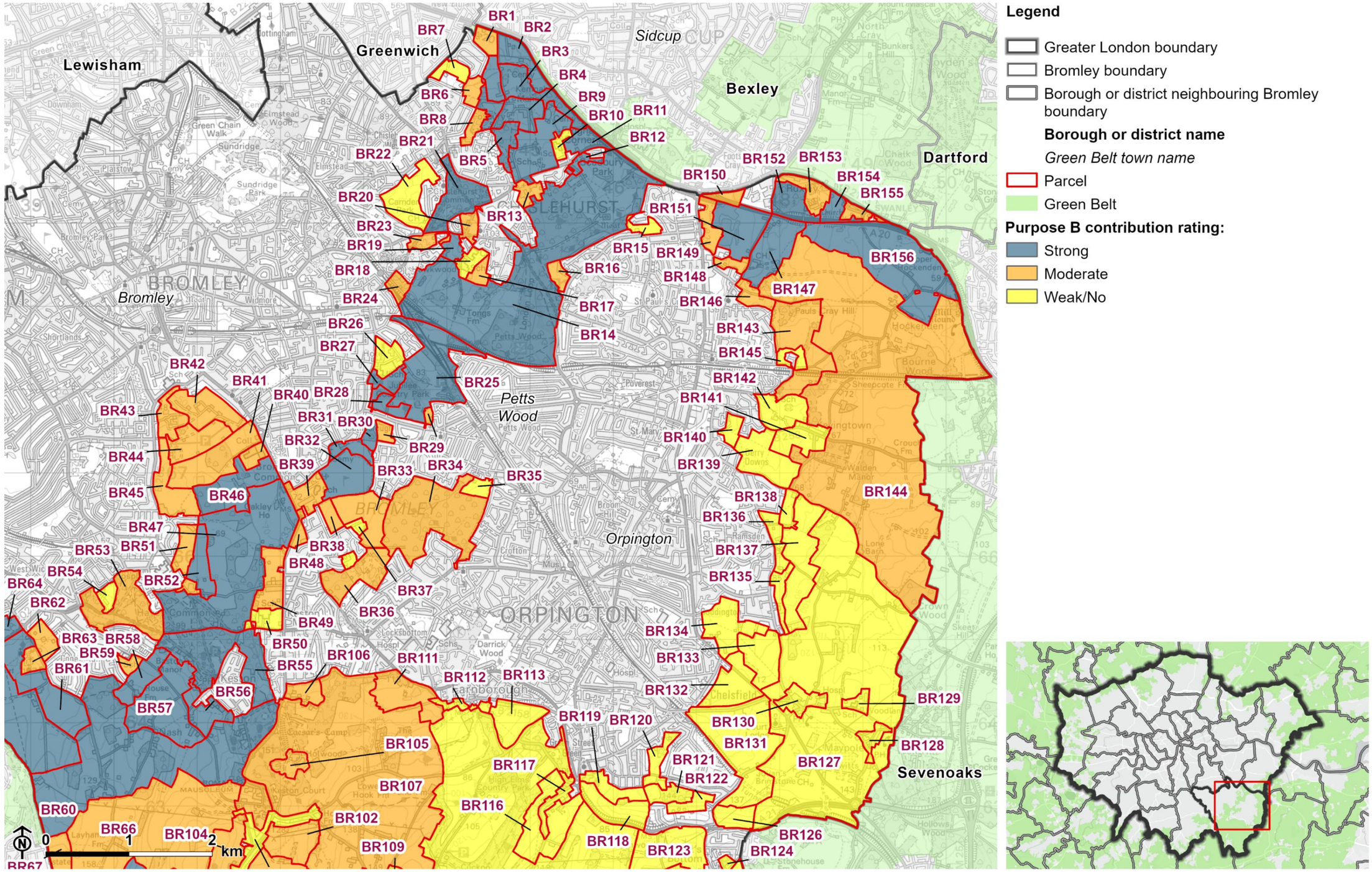

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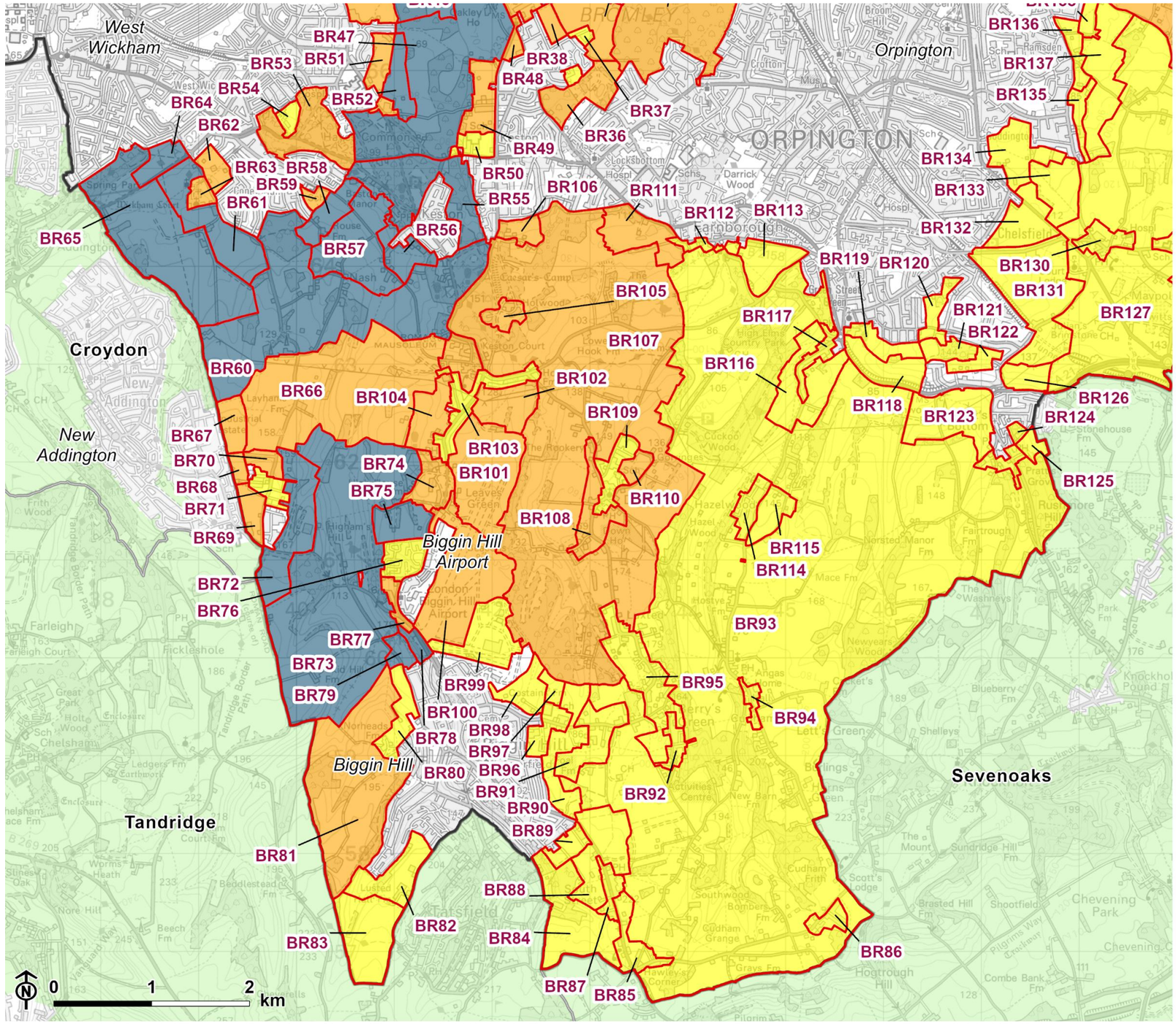
Figure 3.22: Contribution to Purpose B – Prevent the merging of neighbouring towns: South

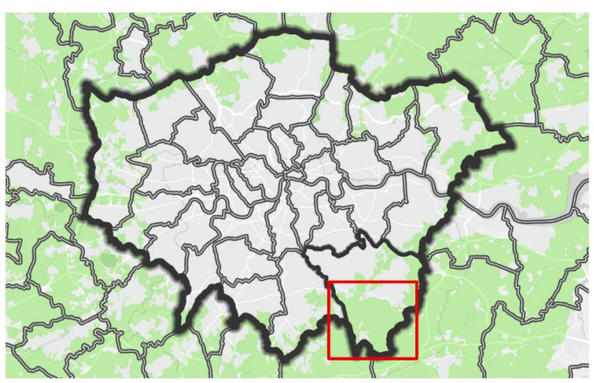


Legend

- Greater London boundary
- Bromley boundary
- Borough or district neighbouring Bromley boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose B contribution rating:

- Strong
- Moderate
- Weak/No



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.117 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

3.118 The majority of the Green Belt land in the borough is open and has a clear connection with the wider countryside and therefore makes a strong contribution to Purpose C.

3.119 Areas that make a strong contribution are located to the east (parcels BR127, BR144 and BR156) and south of Orpington (parcels BR93 and BR107), south and south east of West Wickham (parcels BR60, BR65 and BR66) and around Biggin Hill (parcels BR73, BR81 and BR83). These areas have a strong sense of separation from the urban areas and are not subject to any notable urbanising influence. If development were to take place in these locations, the surrounding Green Belt would be subject to a stronger urbanising influence than is currently the case. In addition, parcels BR41, BR46, BR47 and BR55 make a strong contribution to Purpose C as a result of the important role they play in maintaining the north-south connection between the open countryside in between Bromley, West Wickham and Orpington and the wider open countryside south of Keston.

3.120 Other areas of Green Belt make a strong contribution to Purpose C despite being subject to some (but not significant) urbanising influence, with their openness maintaining a sense of distinction from the urban area and a strong association with the wider countryside. Such locations include areas of contained Green Belt land in between Orpington and Bromley (including Chislehurst), covering parcels BR3-BR5, BR8, BR9, BR11, BR14, BR21, BR25, BR27, BR32-BR34, BR36, BR41, BR44, BR46 and BR47. Although this gap contains sizeable areas of open countryside, their containment by these large built up areas limits their relationship with the wider open countryside beyond. Smaller isolated clusters lie to the south east of New Addington, around Biggin Hill and south and east of Orpington.

3.121 There are a number of areas of open land that make a more moderate contribution to Purpose C by virtue of:

- their land use, which although appropriate in the Green Belt is more associated with the urban area. For example Queen Mary and Westfield Sports Ground (BR9), Chislehurst and Kemnal Park Cemetery (BR1 and BR2), school playing fields, Parkfield Recreation Ground (BR31), Petts Wood Recreation ground (BR35) and Biggin Hill airfield (BR100);

- their containment by urbanising urban areas or other inappropriate development. For example Belmont Open Space (BR6), Chislehurst Golf Course (BR22) and Goddington Park (BR134); and
- features in proximity that would limit the relationship with wider countryside as well as limiting the impact development would have on adjacent Green Belt land (e.g. St Paul's Green and land to the east of the River Cray at St Paul's Cray (BR149)); or,
- a combination of the above.

3.122 As with the other purposes, inappropriate development within the Green Belt lowers the contribution to Purpose C. The small isolated villages and hamlets in the open countryside generally make a moderate contribution to Purpose C (parcels BR87, BR92, BR103, BR109, BR114, BR117 and BR124) as they maintain some openness and have a strong relationship with the wider countryside that surround them.

3.123 Areas that contain significant inappropriate washed over development and are generally located next to established urban area have a more limited relationship with the wider countryside and are considered to make a weak/no contribution. This includes Chislehurst School for Girls (BR10), Midfield Primary School (BR15), former Marjorie McClure School (BR18), Bromley High School (BR26), Trinity Primary School and Bishop Justus School (BR39), Ravens Wood School (BR50), Charles Darwin School and Biggin Hill Primary School (BR96) and Farnborough Primary School and neighbouring development (BR112). In addition, the dense residential development just to the west of Biggin Hill airport (BR76) and the land containing buildings associated with the airport (BR99), as well as land around Layhams Road at Keston Mobile Park (BR71).

3.124 Open Green Belt land that is significantly contained and urbanised by urban areas, or inappropriate development washed over by the Green Belt also make a weak/no contribution to Purpose C by virtue of their stronger association with the urban areas, such as St Mary Cray Recreation Ground (BR140).

3.125 Figures 3.23 and 3.24 illustrate the variations in contribution to Purpose C across Bromley.

Figure 3.23: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment: North

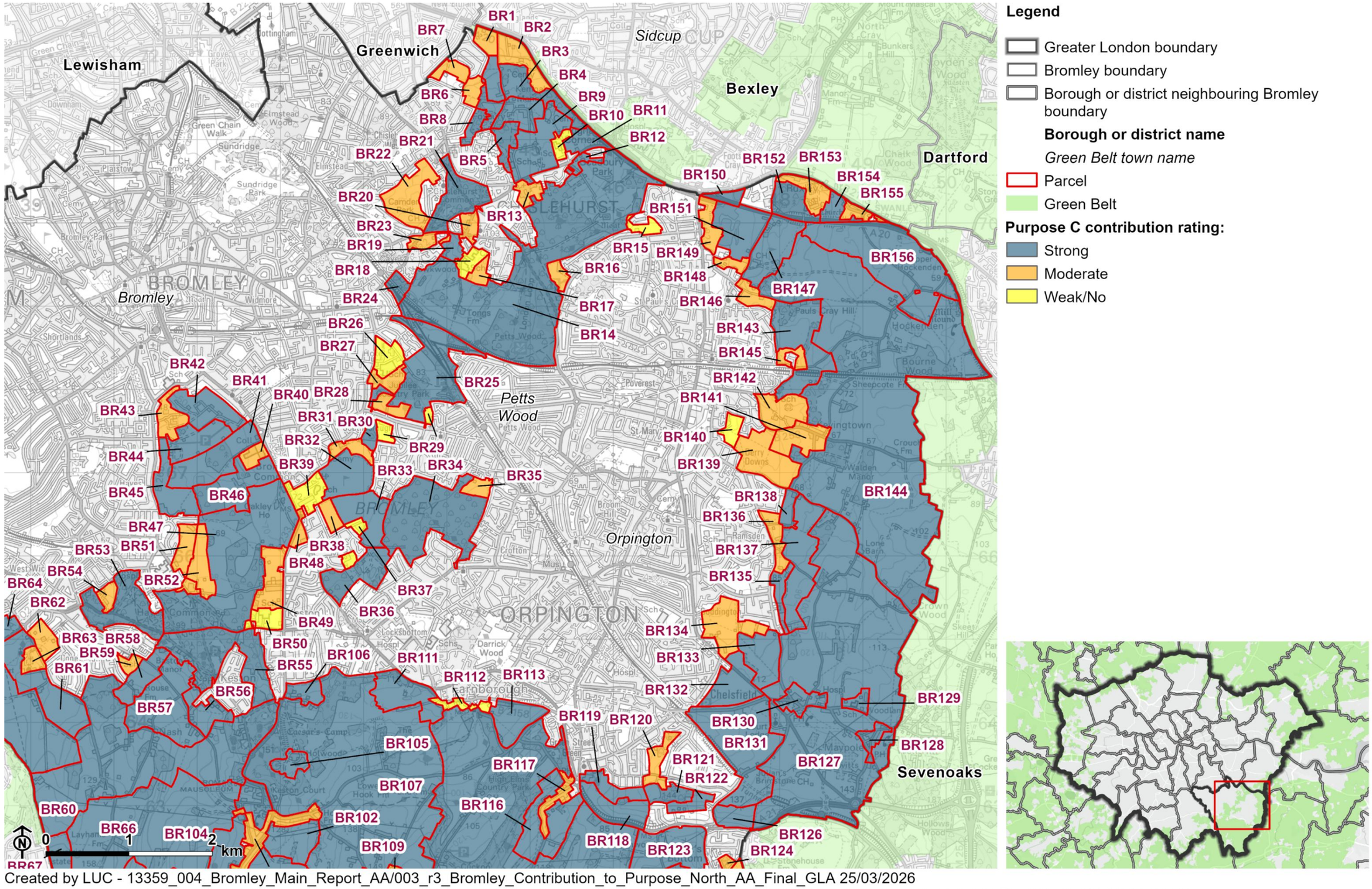

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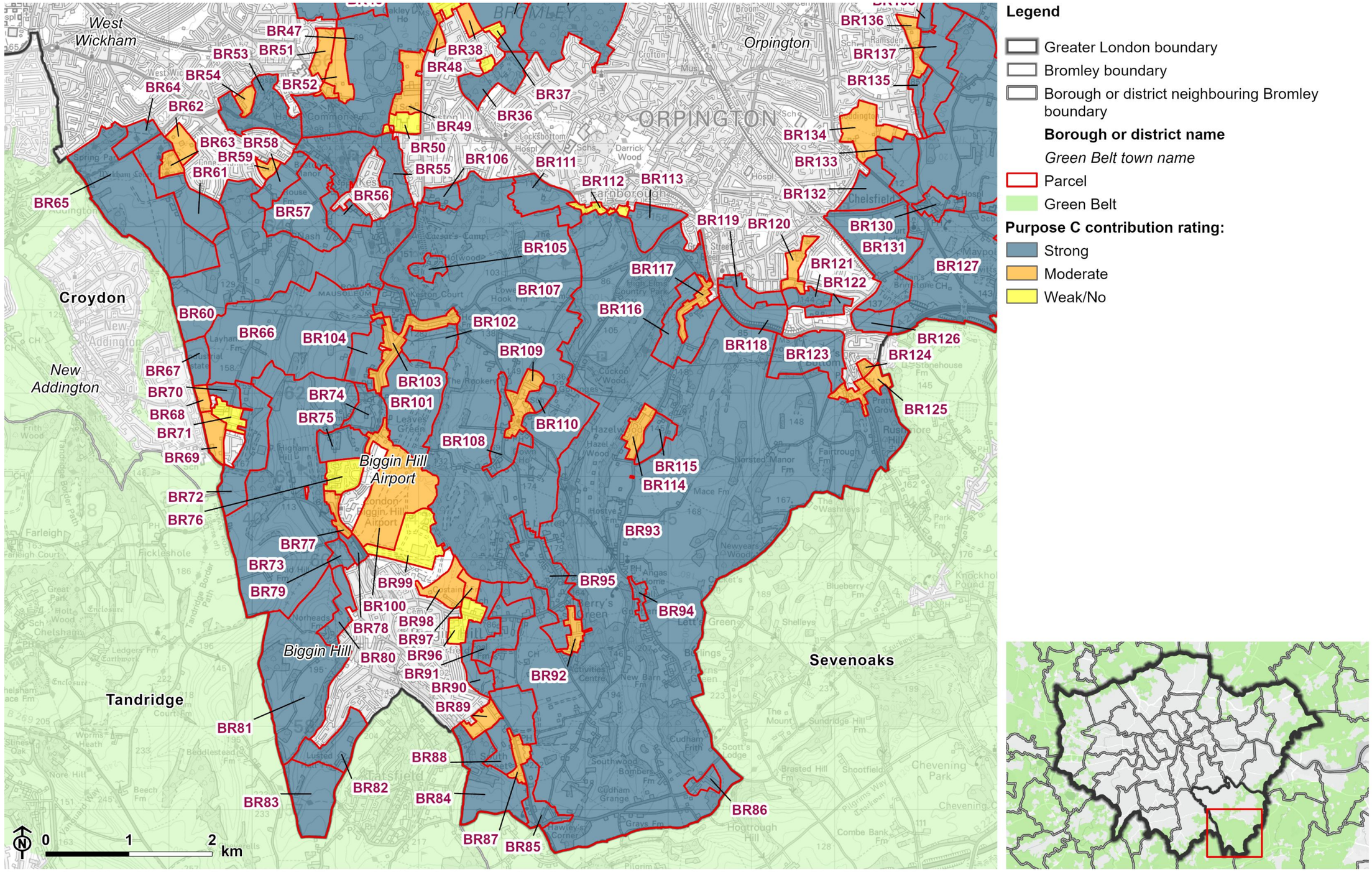
Figure 3.24: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment: South



Legend

- Greater London boundary
- Bromley boundary
- Borough or district neighbouring Bromley boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose C contribution rating:

- Strong
- Moderate
- Weak/No

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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.126 A review of relevant designations within and adjacent to the borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to ten settlements large enough to be considered towns in Green Belt terms: Bexleyheath, Biggin Hill/Biggin Hill Airport, Bromley, Croydon, New Addington, Orpington, Petts Wood, Sidcup, Swanley, and West Wickham.

3.127 New Addington (in the neighbouring London Borough of Croydon) and Swanley (in Sevenoaks District), not to be confused with the historic village of Swanley which is wholly separate from the more modern town, do not contain notable historic cores and settings suitable for their definition as historic towns. Croydon is located in the neighbouring London Borough of Croydon and Bexleyheath is located within the neighbouring London Borough of Bexley, at such a distance that Green Belt land within Bromley makes little to no contribution to their setting and special character.

3.128 However, the following towns have conservations areas located adjacent to Green Belt land:

- Biggin Hill was a rural hamlet until the 20th century and its history is largely defined by its role as a vital Royal Air Force (RAF) fighter station, particularly during the Battle of Britain. The **Biggin Hill RAF Station Conservation Area** designates the former military airfield but it is isolated from the main settlement of Biggin Hill in the open countryside to the north of the Green Belt town and is therefore not considered to be a historic town in Green Belt terms.
- Bromley has a historic core protected by **Bromley Town Centre Conservation Area**, although it is located deep within the urban area and consequently has no notable physical or visual relationship with the open countryside designated as Green Belt to the south. The area is focused predominantly on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points). The **Chislehurst Conservation Area** lies roughly 3 kilometres east of Bromley town centre and comprises predominantly residential development in the west, agricultural and rural land in the east, with the intervening portions incorporating extensive Commons and open space, nodes of retail, service and community facilities, and residential areas. However, the area is valued for its distinctive rural, wooded or village atmosphere separated from and/or screened from the urbanising influence of the large built-up area of Greater London to the west, north and east by its extensive coverage by mature trees. Consequently, the conservation area only

has a notable relationship with the open countryside rather than the neighbouring historic towns in Green Belt terms, with open views of the countryside designated as Green Belt to the south.

- Orpington is not considered to be historic town, as it largely comprises development from the 20th century and lacks an 'historic urban core' (identified within the GLHLC). There are five designated conservation areas that lies on the edge of the town. **Farnborough Village Conservation Area** on the southern edge of the town is designated for its remaining village character and associated historic features. **St Mary Cray Conservation Area** and **St Paul's Cray Conservation Area** on the northern edge of the town are designated to preserve the key buildings of the village centre, together with sufficient elements of its 19th and early 20th century development. The **Farnborough Park Conservation Area** and **Keston Park Conservation Area** protect areas of residential estate founded in the 1920s and are designated for the innovative way that the pre-existing landscape was incorporated into a high quality built development. However, there is no recorded links for these areas to the setting and special character of the town of Orpington.
- Petts Wood is not considered to be historic town, as it largely comprises development from the 20th century and lacks an 'historic urban core' (identified within the GLHLC). The **Chislehurst Road, Petts Wood Conservation Area** is designated to conserve the area's detached houses with a neo-vernacular influence and overall garden suburb character. There is no recorded reference to the setting and special character of the area being linked to the wider open countryside. Therefore, this conservation area is not considered to play a notable role in protecting the setting and special character of neighbouring historic towns in Green Belt terms.
- Sidcup (located within the neighbouring London Borough of Bexley) originated as a tiny hamlet on the road from Maidstone to London, initially known as Foots Cray. **The Green Conservation Area** and the **Halfway Street Conservation Area** protect two remnant historic parts of the town. The Green Conservation Area includes some of Sidcup's oldest surviving buildings, including two former country houses, a church and a timber-framed house. The Green Conservation Area Appraisal (2009) notes that 'these are important landmarks that can be viewed across the public green open spaces', and that 'open spaces include Sidcup Green, which forms a setting to the country houses and a link towards countryside to the east'. In regard to setting the appraisal states that the area 'retains a tranquil charm that evokes a sense of Bexley prior to interwar suburban development when it was characterised by low hills and river valleys'. To the north of The Green lies the Halfway Street Conservation Area which protects a remnant village core within the settlement and contains some of the

earliest surviving buildings in the area. However, Green Belt land in Bromley is physically and visually separated from the historic parts of the town by intervening built form and the Sidcup Bypass (A20) and so makes no contribution to the towns setting and special character.

- West Wickam is not considered to be historic town, as it largely comprises development from the 20th century and lacks an 'historic urban core' (identified within the GLHLC) and conservation area. However, to the south of the town the **Bromley, Hayes and Keston Commons Conservation Area** comprises sixteen individual sub-areas, each linked by common land and identified for its architectural or historic interest and/or semi-rural setting. Designated buildings are deemed to contribute to the area's special character, and established trees and mature gardens maintain the valued semi-rural setting of the commons and their environs. It is the common lands that are the unifying feature of this dispersed conservation area. However, no mention is made of any direct or indirect link between the conservation area and the historic setting and special character of the towns, or other nearby towns of Bromley and Orpington, which lie some distance away.

3.129 The Grade II **Holwood Park Registered Park and Garden** is recognised as a 18th Century landscaped park located to the west of Orpington. The park's listing notes that its 'parkland falls gently away from the house on three sides' and that 'on the south side the land slopes steeply providing spectacular views across the countryside in the direction of Downe and Biggin Hill'. However, the significance of these views is to the park and garden rather than the setting and special character of Orpington or any other of the nearby towns.

3.130 The Borough's adopted Local Plan identifies and designates several views of local importance, landmarks and major skyline ridges under Policy 48 (Skyline), specifically:

- Keston Ridge (skyline ridge) and view of Keston Ridge from southern section of Bromley High Street (view of local importance);
- Keston Windmill (landmark);
- View from Chelsfield Green Warren Road, looking North towards the Cray Valley (view of local importance); and
- View over City and Docklands from Hayes Common (view of local importance).

3.131 The Borough's adopted Local Plan and associated evidence base contains no information informing the justification and special character of each. Consequently, LUC has reviewed the Borough's Policies Map to evaluate the extent of each, their

relationship with the defined historic towns and contribution to their protected special character:

- Views of Keston Ridge from southern section of Bromley High Street have a limited relationship with the historic areas of the town. Keston Ridge looks over Keston village conservation area and Keston Park conservation area, both of which have been noted not to relate to the town of Orpington.
- Keston Windmill is located in Keston Village conservation area, which is separate from the town of Orpington. Furthermore, there are no notably important views between the historic areas of the town and this landmark.
- Views from Chelsfield Green Warren Road looks towards eastern edge of Orpington, but not to or from any notable historic areas.
- Views over City and Docklands from Hayes Common overlook a number of conservation areas within the Borough, but none identified to be of any notable significance to the setting and special character of historic towns in Green Belt terms, i.e. Bromley and Beckenham.

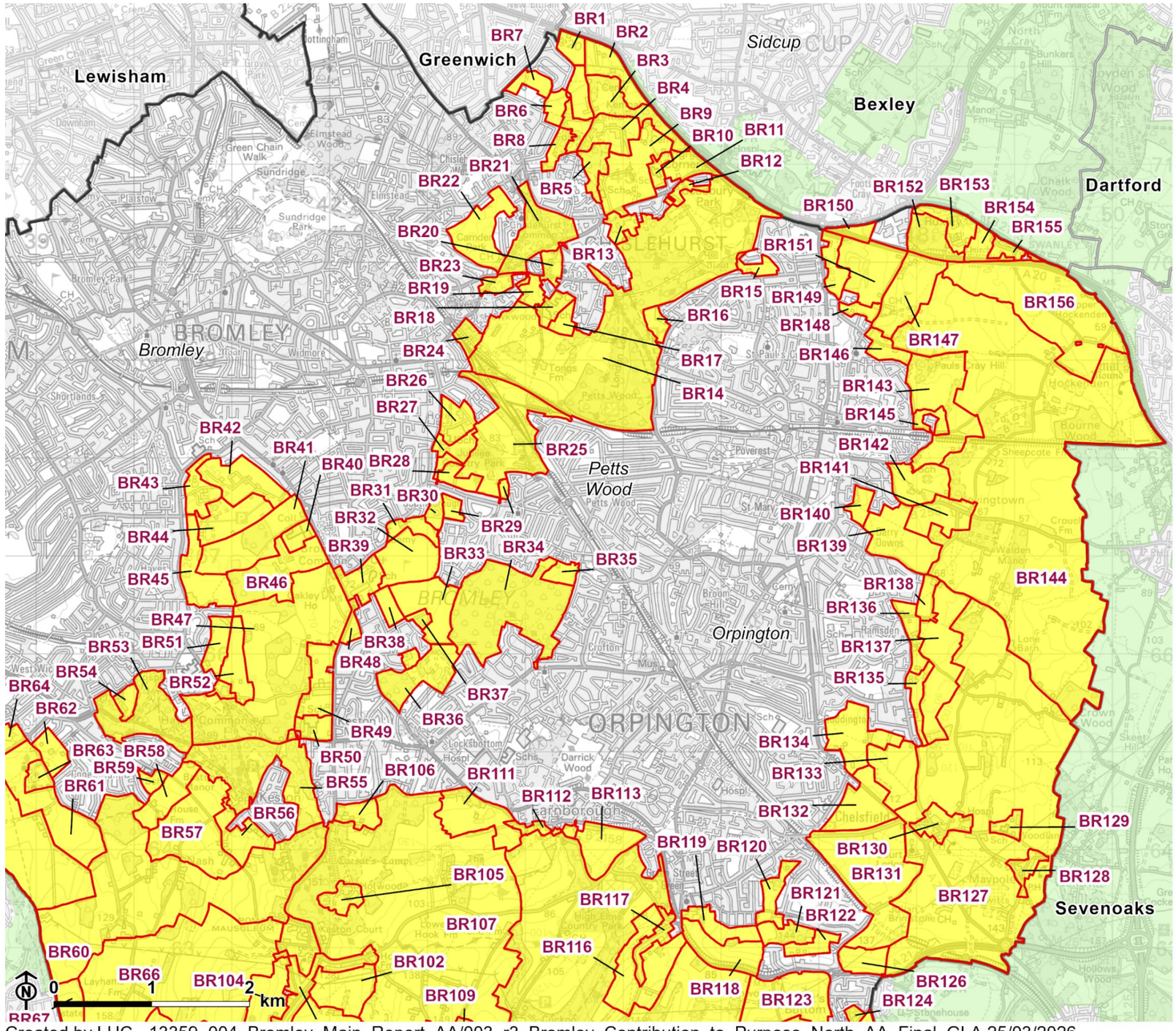
3.132 In light of the above, it is considered that none of the views of local importance, landmarks and major skyline ridges contribute to the setting and significance of the historic towns (in Green Belt terms).

3.133 Therefore, all of the Green Belt land within Bromley is considered to make a weak / no contribution to Green Belt Purpose D as shown on figures 3.25 and 3.26.

3.134 It is important to note that this conclusion does not mean that the Borough does not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.135 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

Figure 3.25: Contribution to Purpose D – Preserve the setting and special character of historic towns: North



Legend

- Greater London boundary
- Bromley boundary
- Borough or district neighbouring Bromley boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose D contribution rating:

- Strong
- Moderate
- Weak/No

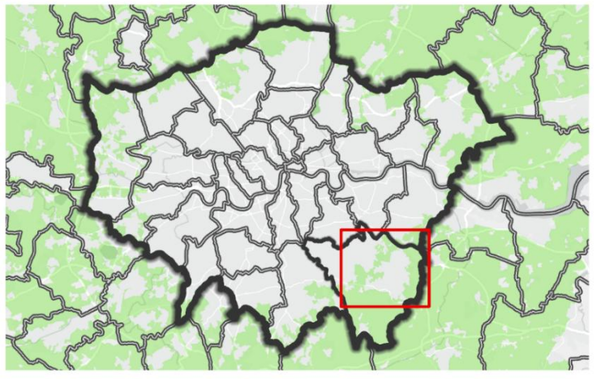


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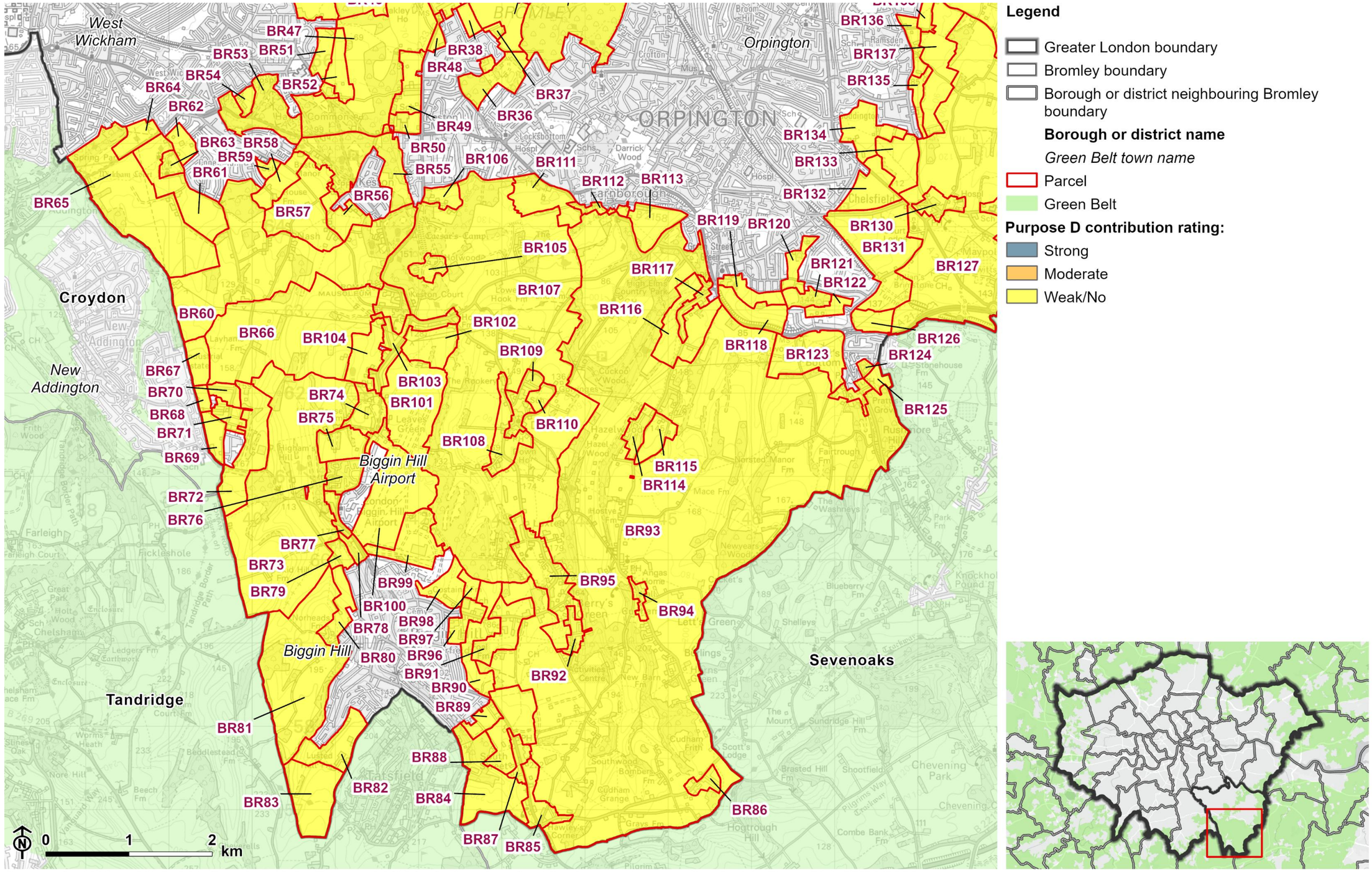
Figure 3.26: Contribution to Purpose D – Preserve the setting and special character of historic towns: South



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Potential grey belt in the London Borough of Bromley

3.136 Having regard to the definition set out the NPPF, the following areas of Bromley are defined as having potential for definition as grey belt land subject to further work by the borough:

- Sidcup Family Golf Centre (BR1).
- Belmont Open Space and Edgebury Primary School and Marjorie McClure School playing fields (parcels BR6 and BR7).
- Mead Road Infant School and the contained land to the north (BR8).
- Chislehurst School for Girls (BR10) and Farringtons School (BR13).
- Chislehurst Church of England Primary School and surrounding contained land (BR20), Chislehurst Golf Course (BR22) and Chislehurst Cricket Club (BR23).
- Midfield Primary School and playing fields (BR15).
- Marjorie McClure School and Playing Fields (parcels BR17 and BR18).
- Bromley High School (BR26).
- Southborough Primary School and St James' Primary School (BR29).
- Open fields and Richmal Crompton Recreation Ground (BR33).
- Petts Wood Recreation Ground (BR35).
- Developed land off Jackson Road and Lower Gravel Road (BR37).
- Land east of Prince's Plain Road(BR38).
- Bishop Justus School and Trinity Primary School (BR39).
- London South East College (BR40).
- Land around the periphery of Norman Park adjacent to the urban edge (parcels BR42, BR43 and BR45).
- Urbanised land east and west of Oakley Road, including Ravens Wood School (parcels BR48-BR50).
- Hayes Primary School and Baston House School and playing fields (BR51).
- Contained woodland north of Coney Hall (parcels BR53 and BR54).
- Coney Hall Recreation Ground and Coloma Court (parcels BR62 and BR63).
- Developed and urbanising land south east of New Addington (parcels BR68, BR69 and BR70).

- Developed and urbanising land north west, north and north east of Biggin Hill, including the southern portions of Biggin Hill Airport (parcels BR76, BR77, parcels BR96-BR100.
- Urban development retained by woodland south of Farnborough (BR112).
- Isolated settlements washed over by the Green Belt, including: South Street (BR87), Berrys Green (BR92), Leaves Green (BR103), Downe (BR109), Hazelwood (BR114), the developed land along Cudham Lane North (BR117) and south of Pratts Bottom (parcels BR124 and BR125).
- The contained land north of Worlds End Lane (BR120).
- Goddington Park (BR134).
- Urbanised land east of Chelsfield Lane (BR136).
- Partially contained and urbanised land retained by woodland north and south of Crockenhill Road (parcels BR139, BR140 and BR142).
- Partially contained and urbanised land east of Barnfield Road (BR145).
- Retained and urbanised land north and south of Chapmans Lane (BR146).
- Contained land north of Saint Pauls Cray and south of Foots Cray (parcels BR148-BR150).
- Contained and urbanised land to the east of Ruxley (parcels BR153 and BR155).

3.137 Figures 3.27 and 3.28 illustrates the area potentially suitable for definition as grey belt land within Bromley.

Figure 3.27: Green Belt land potentially suitable for definition as grey belt land: North

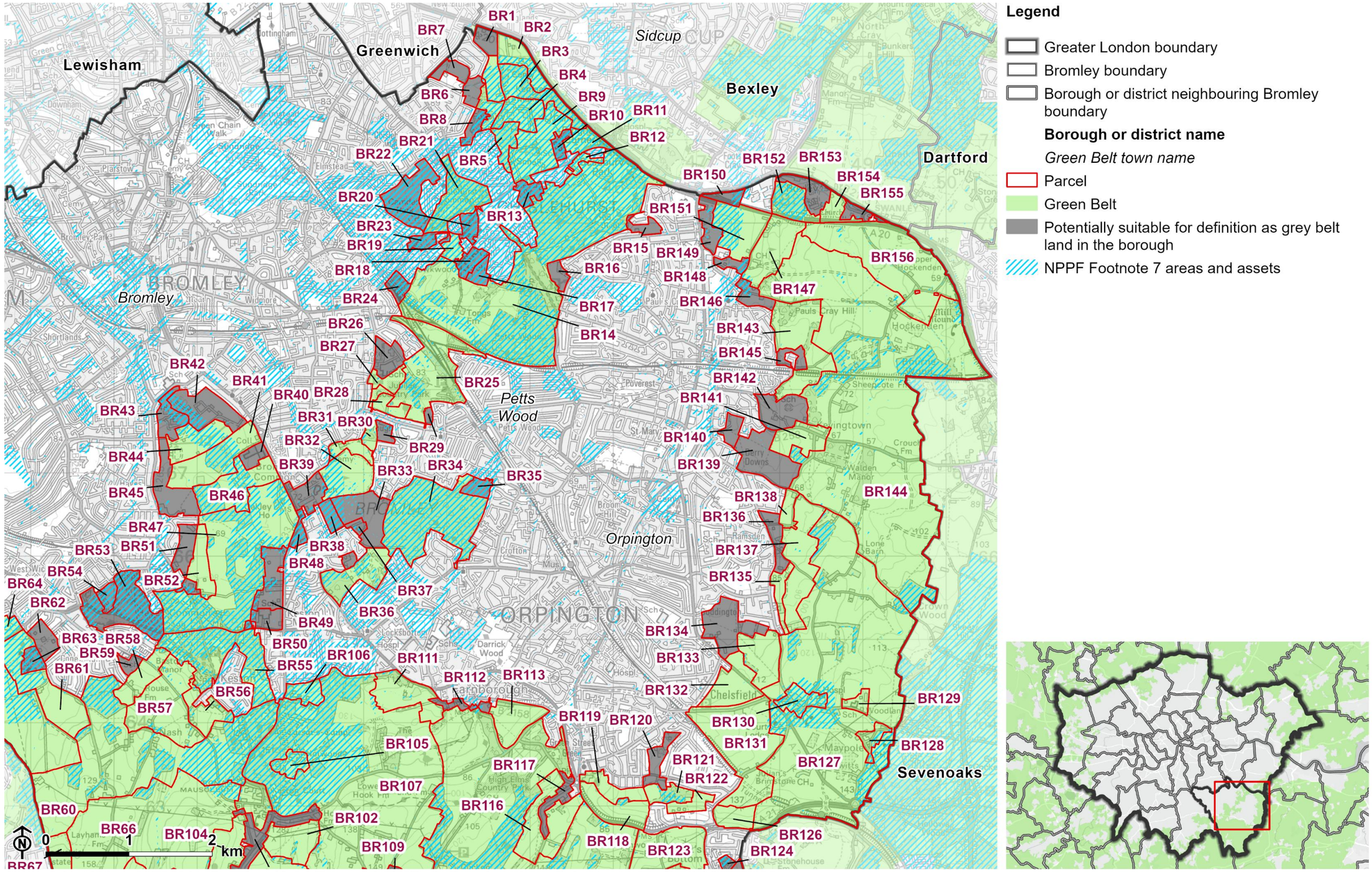

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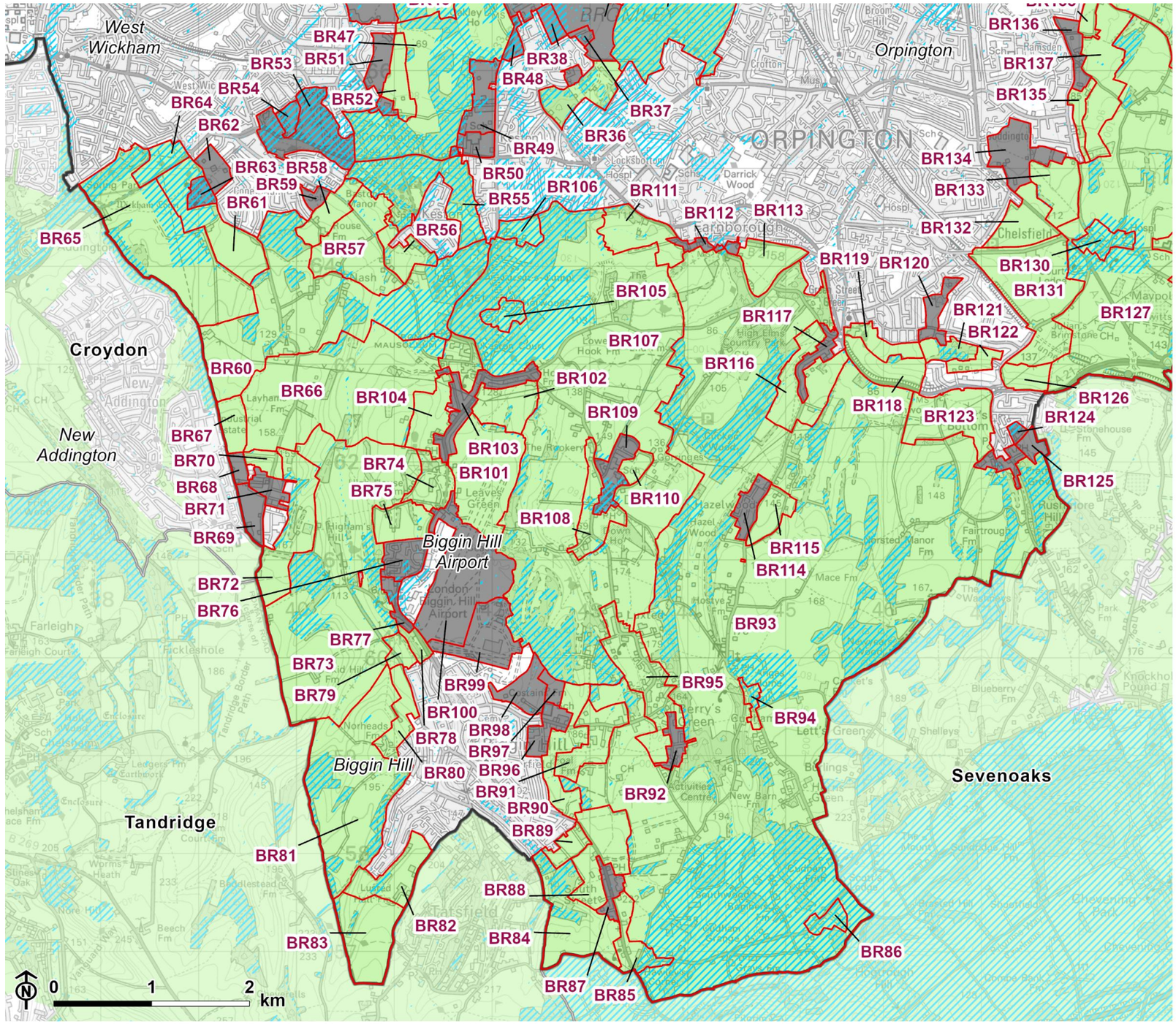
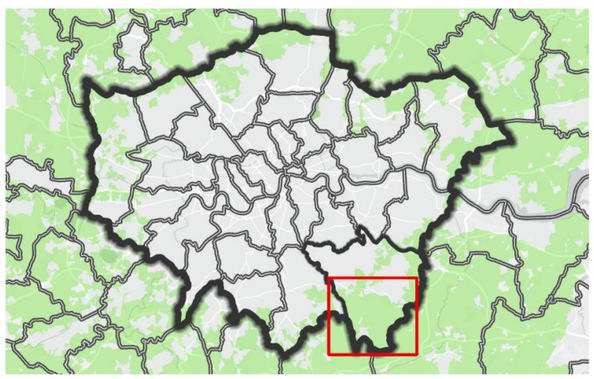
Figure 3.28: Green Belt land potentially suitable for definition as grey belt land: South



Legend

- Greater London boundary
- Bromley boundary
- Borough or district neighbouring Bromley boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets



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Highest and lowest contributing Green Belt land

3.138 The majority of the Green Belt in Bromley makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that makes the greatest contribution to the greatest number of Green Belt purposes include the open land:

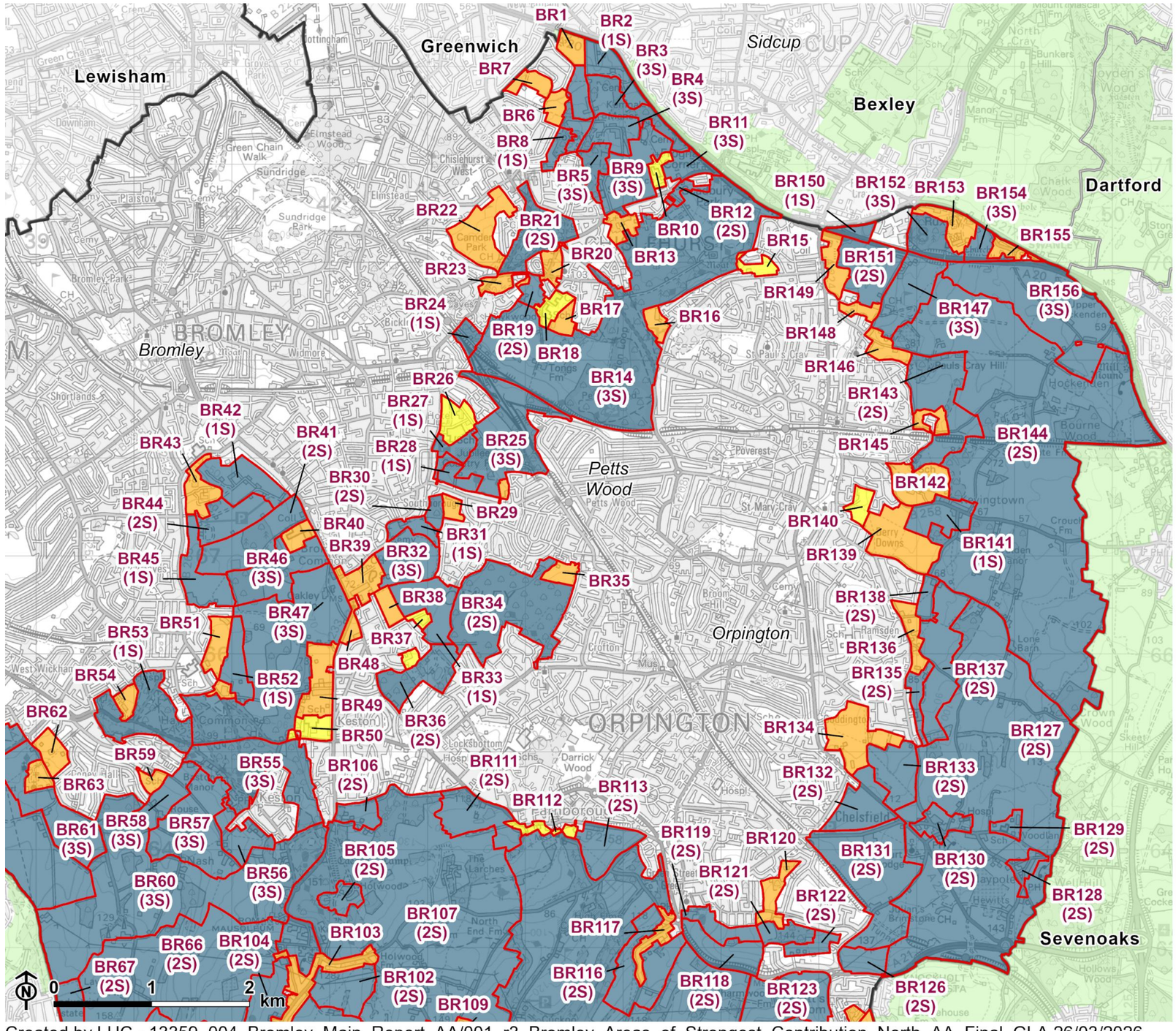
- To the south of Bromley, south-west of Orpington near Coney Hall and Keston, in particular the areas just to the north-east and north-west of Nash (including parcels BR55, BR57 and BR60). These areas make a strong contribution to purposes A, B and C. The area directly to the north makes a strong contribution to purposes B and C (BR47). Parcel BR66 to the south of BR60 make a strong contribution to purposes A and C.
- To the south west of West Wickham in between the large built-up area of Greater London and New Addington. This area makes a strong contribution to purposes A, B and C.
- To the south of Orpington in between the town and the village of Pratt's Bottom. This area makes a strong contribution to purposes A and C.
- To the east and south of Orpington, land makes a strong contribution to purposes A and C (parcels BR93, BR107, BR127 and BR144 and BR156). BR156 also makes a strong contribution to Purpose B.
- To the south west and west of Biggin Hill where land makes a strong contribution to purposes A and C (parcels BR81 and BR83) and north west between Biggin Hill and New Addington where land makes a strong contribution to purposes A and C and a strong contribution to Purpose B (BR73).
- Forming the gap between Bromley and Orpington where land makes a strong contribution to Purpose B and a strong contribution to purposes A and C (parcels BR14, BR25, BR30, BR32, BR41, BR46 and BR47). Parcels BR41, BR46 and BR47 make a strong contribution to Purpose C.

3.139 The areas within Bromley that contribute the least to the Green Belt purposes tend to be inappropriately developed Green Belt land where there is a distinct lack of openness, or contained pockets of Green Belt that are associated with urban areas and isolated from the wider open countryside. The most notable developed and isolated areas that only make a weak/no contribution to the Green Belt purposes include the grounds of educational establishments including: Chislehurst School for Girls (BR10), Midfield Primary School (BR15), former Marjorie McClure School (BR18), Bromley High School (BR26), Ravens Wood School (BR50), Charles Darwin School and Biggin Hill Primary School (BR96), Farnborough Primary School and neighbouring development (BR112), St Mary Cray Recreation Ground (BR140). The

dense residential development just to the west of Biggin Hill airport (BR76) and the land containing buildings associated with the airport (BR99), as well as land around Layhams Road at Keston Mobile Park (BR71) also make a weak / no contribution to the Green Belt purposes.

3.140 Figures 3.29 and 3.30 illustrate the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.29: Highest contribution to NPPF Green Belt purposes: North



Legend

- Greater London boundary
- Bromley boundary
- Borough or district neighbouring Bromley boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.

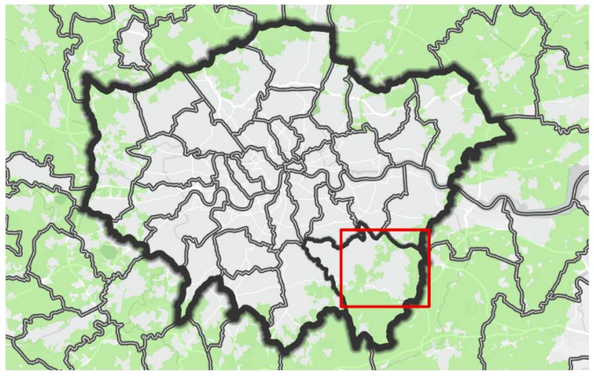


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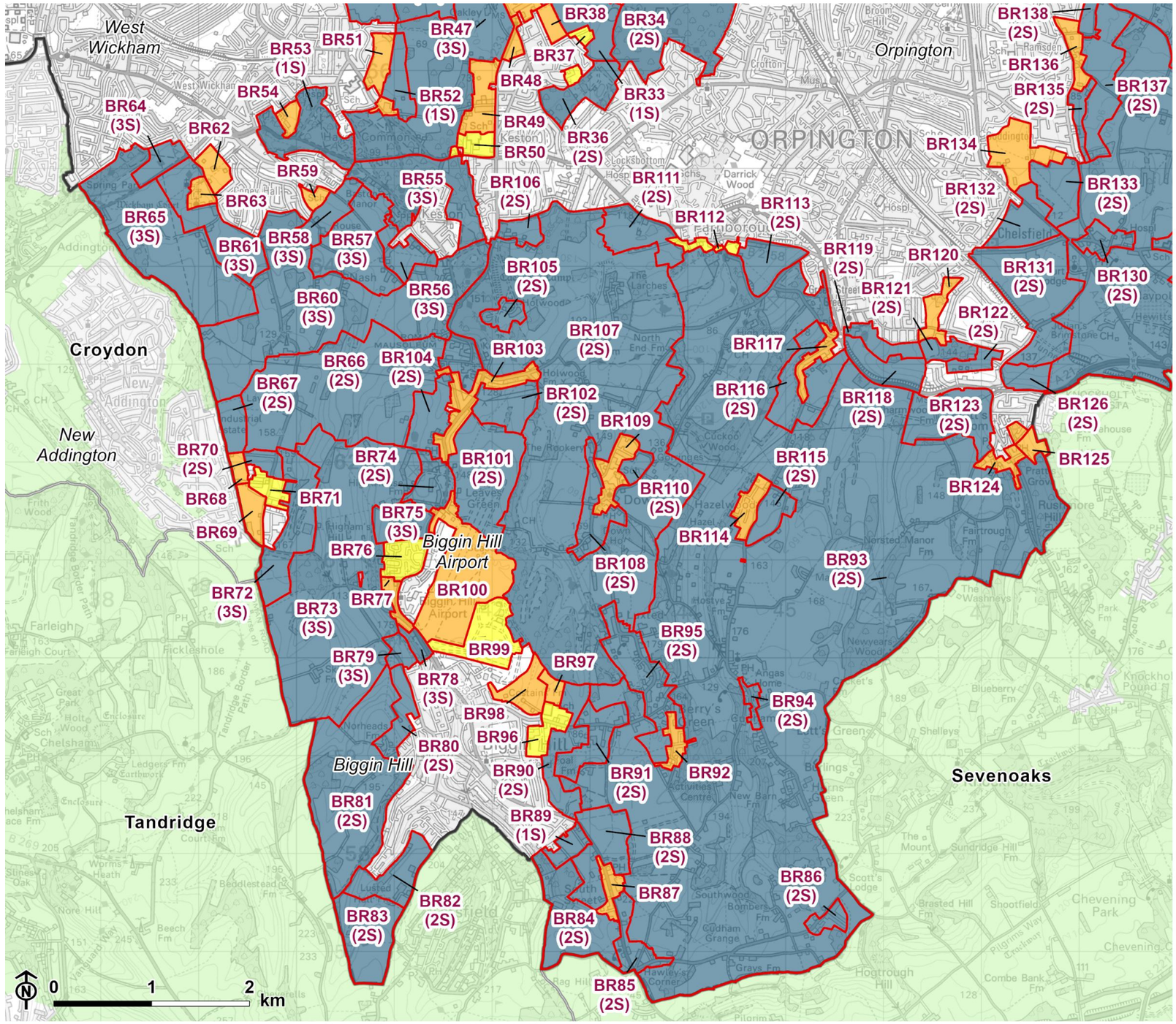
Figure 3.30: Highest contribution to NPPF Green Belt purposes: South



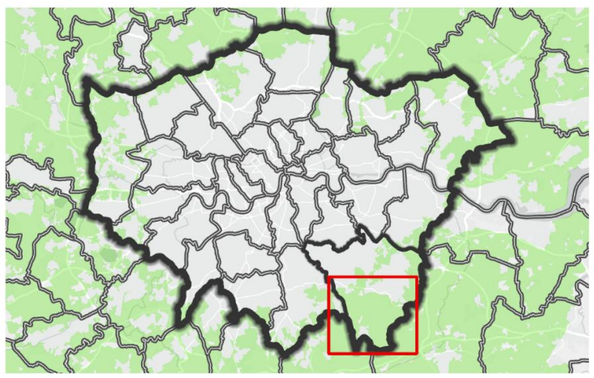
Legend

- Greater London boundary
- Bromley boundary
- Borough or district neighbouring Bromley boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.141 In light of the scale and contiguity of Green Belt land in Bromley and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with Biggin Hill, New Addington and Swanley in combination would likely have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably Bromley (Biggin Hill, Bromley/West Wickham, New Addington, Orpington/Petts Wood, Sidcup (via Foots Cray) and Swanley, would likely have a fundamental impact on Purpose B.
- Release or development of the vast majority of all the open Green Belt land within Bromley would likely have a fundamental impact on Purpose C.

Croydon

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.142 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

3.143 The majority of land within Croydon makes a strong contribution to Purpose A being adjacent or near to the large built up area and a strong sense of separation from urbanising influences and/or lacking physical features to restrict and contain development (parcels CR2, CR8, CR12, CR13, CR16, CR17, CR19, CR27, CR28, CR33, CR35, CR36, CR38, CR39, CR42-47, CR49, CR54-57, CR59-64, CR67, CR68, CR70, CR71, CR73, CR75, CR76, CR78, CR80-82, CR84, CR86 and CR89). Development in these locations would expand the large built up area into the open countryside and would therefore have a notable incongruous impact on the urban pattern. In the east of the borough strongly performing parcels to the north and west of New Addington (parcels CR59, CR61, CR75 and CR70) play an important role in

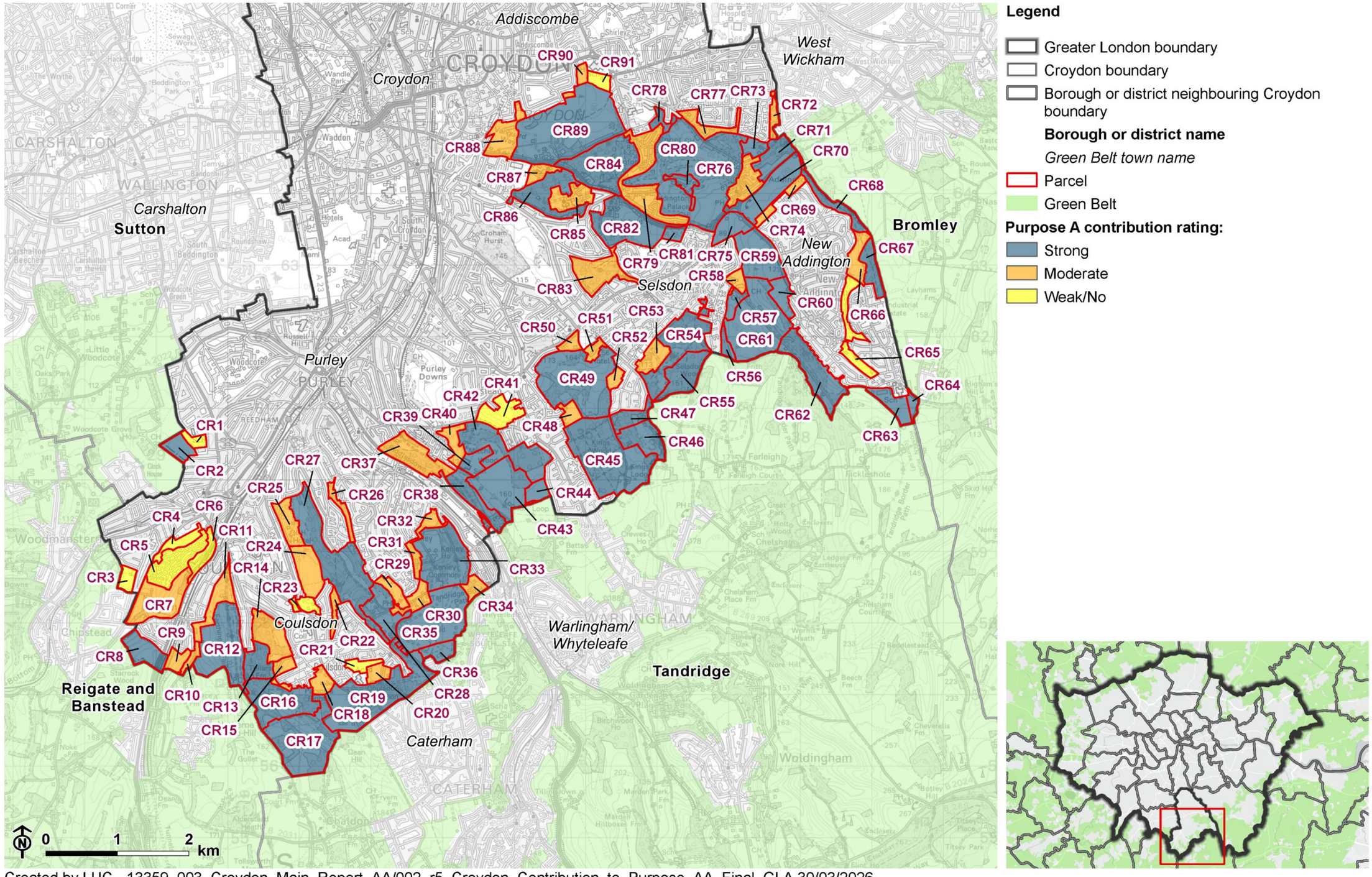
preventing the merging of the town with Greater London or Addington, with the risk of their merging increasing their combined sprawling influence.

3.144 Where the land is partially developed, more contained and/or has some notable relationship with the large built-up area it tends to make a more moderate contribution to Purpose A (parcels CR7, CR9-11, CR14, CR15, CR18, CR20, CR22, CR24-26, CR29-32, CR34, CR37, CR40, CR48, CR50-53, CR58, CR66, CR69, CR72, CR74, CR77, CR79, CR83, CR85, CR87, CR88 and CR90). These areas still maintain some sense of separation from the urban areas and play some role in inhibiting sprawl of the large built up areas.

3.145 Green Belt land that contains significant areas of development and/or is particularly contained and urbanised by large built-up areas (parcels CR1, CR3-CR6, CR21, CR23, CR41, CR65 and CR91) make a weak/no contribution to Purpose A.

3.146 Figure 3.31 illustrates the variations in contribution to Purpose A across Croydon.

Figure 3.31: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



Legend

- Greater London boundary
- Croydon boundary
- Borough or district neighbouring Croydon boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose A contribution rating:

- Strong
- Moderate
- Weak/No

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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.147 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.148 Land that makes a strong contribution to Purpose B forms substantial parts of gaps between towns, by virtue of its location, openness and the presence of strong separating or connecting features within the parcel, or a general lack of separating features in the gap. This includes land within or on the prominent periphery of the following fragile gaps between:

- Coulsdon (including Old Coulsdon) and Caterham on the Hill/Caterham Valley (parcels CR17 and CR19).
- Coulsdon and Whyteleafe/Warlingham (via Kenley) (parcel CR27).
- Whyteleafe/Warlingham and Caterham and Coulsdon and Purley (via Kenley) (parcels CR28, CR33 and CR35).
- Whyteleafe/Warlingham and Selsdon (via Sanderstead) (parcels CR42-44, CR45, CR46 and CR49).
- Selsdon (via Forestdale) and New Addington (parcels CR56, CR57, CR59, CR60, CR61, CR62 and CR75).
- New Addington and West Wickham (parcels CR67 and CR68).
- West Wickham, Selsdon and Croydon (via Shirley, Addington and Spring Park) (parcels CR70, CR71, CR73, CR75, CR76, CR78, CR80 and CR84).
- Croydon and Selsdon (parcels CR81, CR82, CR86 and CR89).

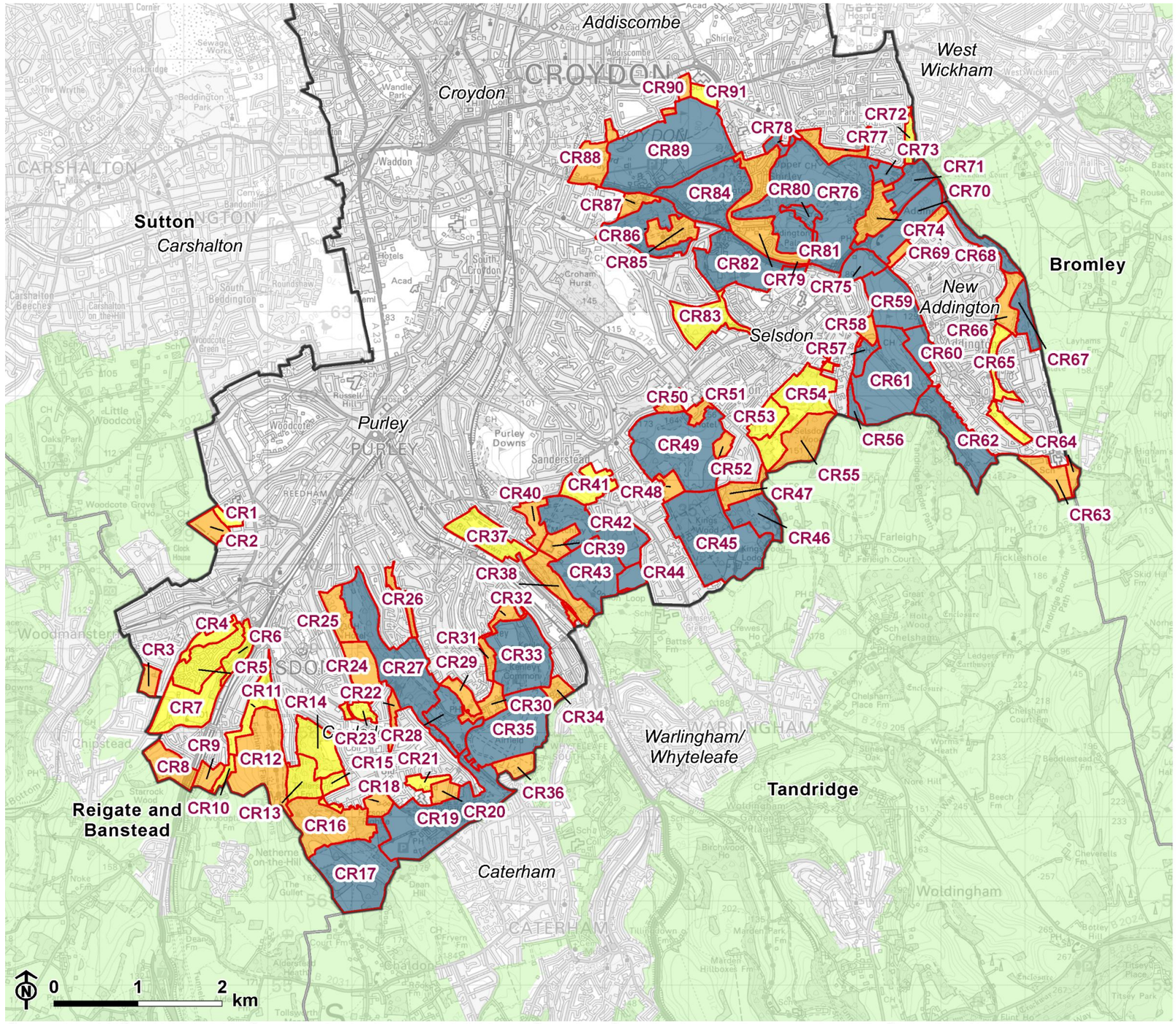
3.149 Green Belt land that is particularly developed and/or contained and urbanised by the surrounding urban area such that it is notably more peripheral or there is a lack of open land contributing to separation between neighbouring towns (parcels CR1, CR4-CR7, CR10, CR11, CR13-CR15, CR21, CR23, CR37, CR41, CR53, CR54, CR65, CR83 and CR91) make a weak/no contribution to Purpose B.

3.150 The remaining areas make a moderate contribution to this purpose because they represent less substantial parts of gaps between towns either by virtue of the wider presence of open land and separating features within the gaps and/or being more contained or urbanised by urban areas. These areas are still generally open and sufficiently distinct that they still play some separating role between neighbouring towns (parcels CR2, CR3, CR8, CR9, CR12, CR16, CR18, CR20, CR22, CR24-

CR26, CR29-CR32, CR34, CR36, CR38-CR40, CR48, CR50-CR52, CR55, CR58, CR63-CR64, CR66, CR69, CR74, CR77, CR79, CR85, CR87, CR88 and CR90).

3.151 Figure 3.32 illustrates the variations in contribution to Purpose B across Croydon.

Figure 3.32: Contribution to Purpose B – Prevent the merging of neighbouring towns

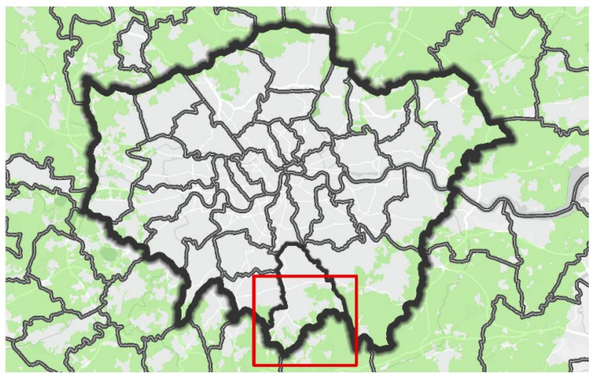


Legend

- Greater London boundary
- Croydon boundary
- Borough or district neighbouring Croydon boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose B contribution rating:

- Strong
- Moderate
- Weak/No



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.152 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

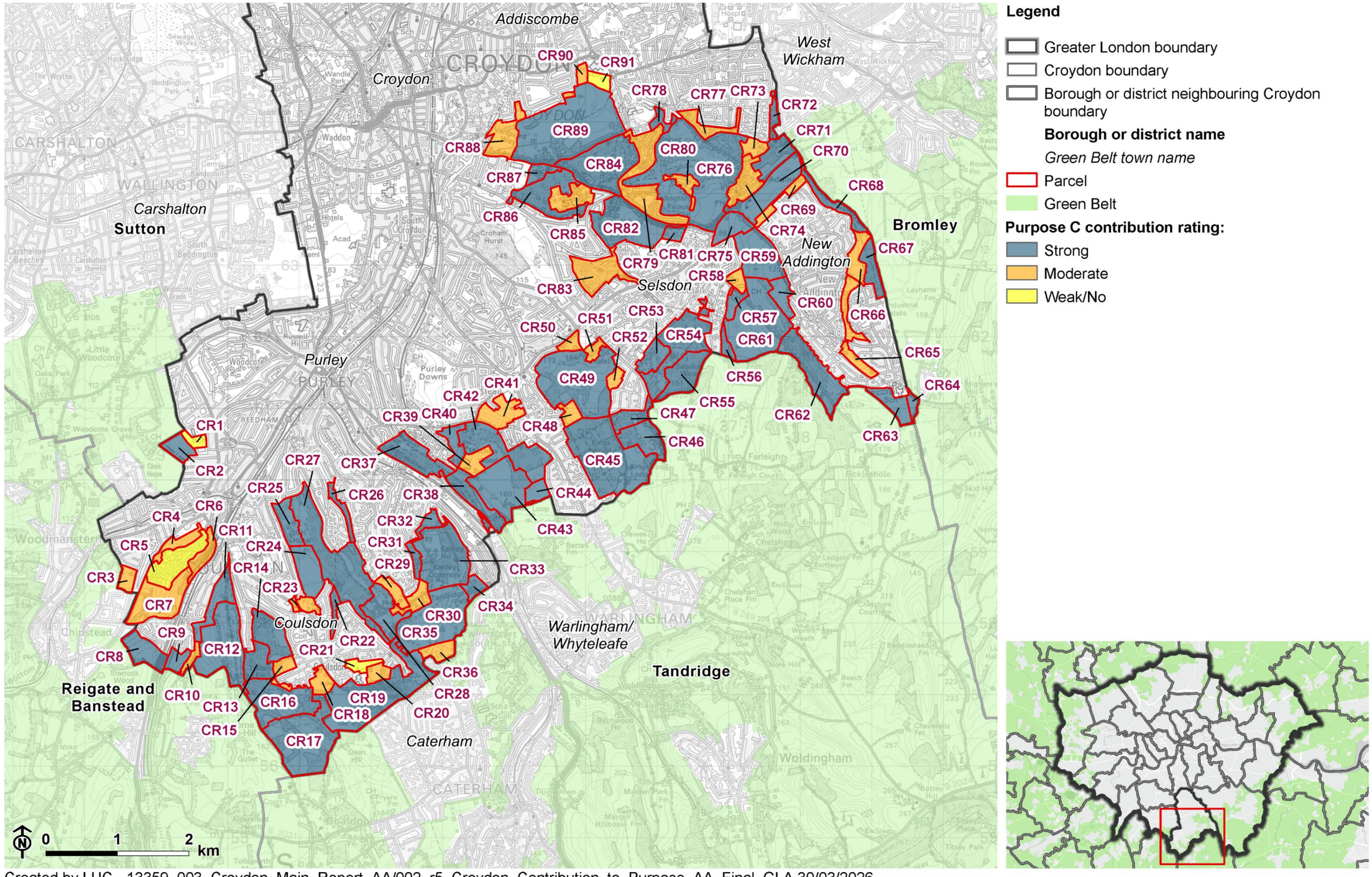
3.153 The majority of the Green Belt land in the borough is open and has a clear connection with the wider countryside and therefore makes a strong contribution to Purpose C. Areas that make a strong contribution are either located away from the urban edges or are separated from it by a significant boundary feature and therefore have a strong sense of separation from the urban areas and are not subject to any notable urbanising influence (parcels CR8, CR11-CR14, CR16, CR17, CR19, CR22, CR24-28, CR31-CR35, CR37, CR38, CR40, CR42-CR47, CR49, CR53-CR57, CR59, CR60, CR62, CR64, CR67, CR68, CR70-CR72, CR75, CR76, CR78, CR81, CR82, CR84, CR86 and CR89); or where the sense of separation is less strong but development would have an urbanising influence on adjacent open land (parcels CR2, CR9 and CR63). If development were to take place in these locations, the surrounding Green Belt would be subject to a stronger urbanising influence than is currently the case. In addition, the significant number of narrow green wedges in the borough means that release and development in several locations would risk severing areas of open countryside from the wider Green Belt to the south (parcels CR12, CR13, CR19, CR22, CR28, CR33, CR35, CR38, CR42, CR43, CR45, CR54, CR70, CR76 and CR84).

3.154 Green Belt land that contains significant areas of development and/or is significantly contained and urbanised by urban areas limiting their relationship with the wider countryside make a weak/no contribution to Purpose C (parcels CR1, CR5, CR21 and CR91).

3.155 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where Green Belt land is open but has land uses associated with the urban area rather than the open countryside, such as sports playing fields or allotments (parcels CR3, CR15, CR39, CR41, CR48, CR51, CR65, CR73, CR85 and CR88); or where land is partially developed (parcels CR10, CR20, CR30, CR74, CR77, CR79 and CR80); or open but has limited relationship with the wider countryside such that development would not have a notably wider encroaching influence (parcels CR4, CR6, CR7, CR18, CR23, CR52, CR58, CR66, CR83 and CR90).

3.156 Figure 3.33 illustrates the variations in contribution to Purpose C across Croydon.

Figure 3.33: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.157 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the borough contains and lies adjacent to fourteen settlements large enough to be considered towns in Green Belt terms – Addiscombe, Banstead/Burgh Heath/Nork, Biggin Hill/Biggin Hill Airport, Carshalton, Caterham on the Hill/Caterham Valley, Coulsdon (including Old Coulsdon), Croydon, New Addington, Purley, Redhill/Reigate, Selsdon, Sutton, Warlingham/Whyteleafe and West Wickham.

3.158 Carshalton, Croydon and Sutton have historic cores protected by conservations areas, although these are located deep within the urban area and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt within Croydon. The areas are focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points).

3.159 Banstead/Burgh Heath/Nork and Redhill/Reigate are located in the borough of Reigate and Banstead to the west and south of Croydon Borough respectively; and Caterham on the Hill/Caterham Valley and Warlingham/Whyteleafe are located within Tandridge to the south. These towns are located at such a distance that Green Belt land within Croydon makes little to no contribution to its setting and special character.

3.160 Addiscombe, New Addington, Purley, Selsdon and West Wickham are not considered to be historic towns. These settlements are predominantly suburban areas developed in the late 19th and/or early 20th centuries following the arrival of the railways and or as satellite towns to alleviate housing shortages in Inner London. They lack an identified ‘historic urban core’ identified within the Greater London Historic Landscape Characterisation (GLHLC, 2021) and do not contain any conservation area designations.

3.161 Biggin Hill is also not considered to be a historic town. It was a rural hamlet until the 20th century and its history is largely defined by its role as a vital Royal Air Force (RAF) fighter station, particularly during the Battle of Britain. The **Biggin Hill RAF Station Conservation Area** designates the former military airfield but it is isolated from the main settlement of Biggin Hill in the open countryside to the north of the Green Belt town.

3.162 However, the following towns have conservations areas which are located in close proximity to Green Belt land:

- Coulston lies on the edge of the North Downs and has a distinctive landscape setting of dry chalk valleys. **Bradmore Green Conservation Area** marks the historic core of Old Coulsdon, focused around the open spaces of Bradmore Green and Grange Park. The area features a number of historic listed and locally listed buildings dating from between the 13th and 18th centuries including the Grade I Church of St John.

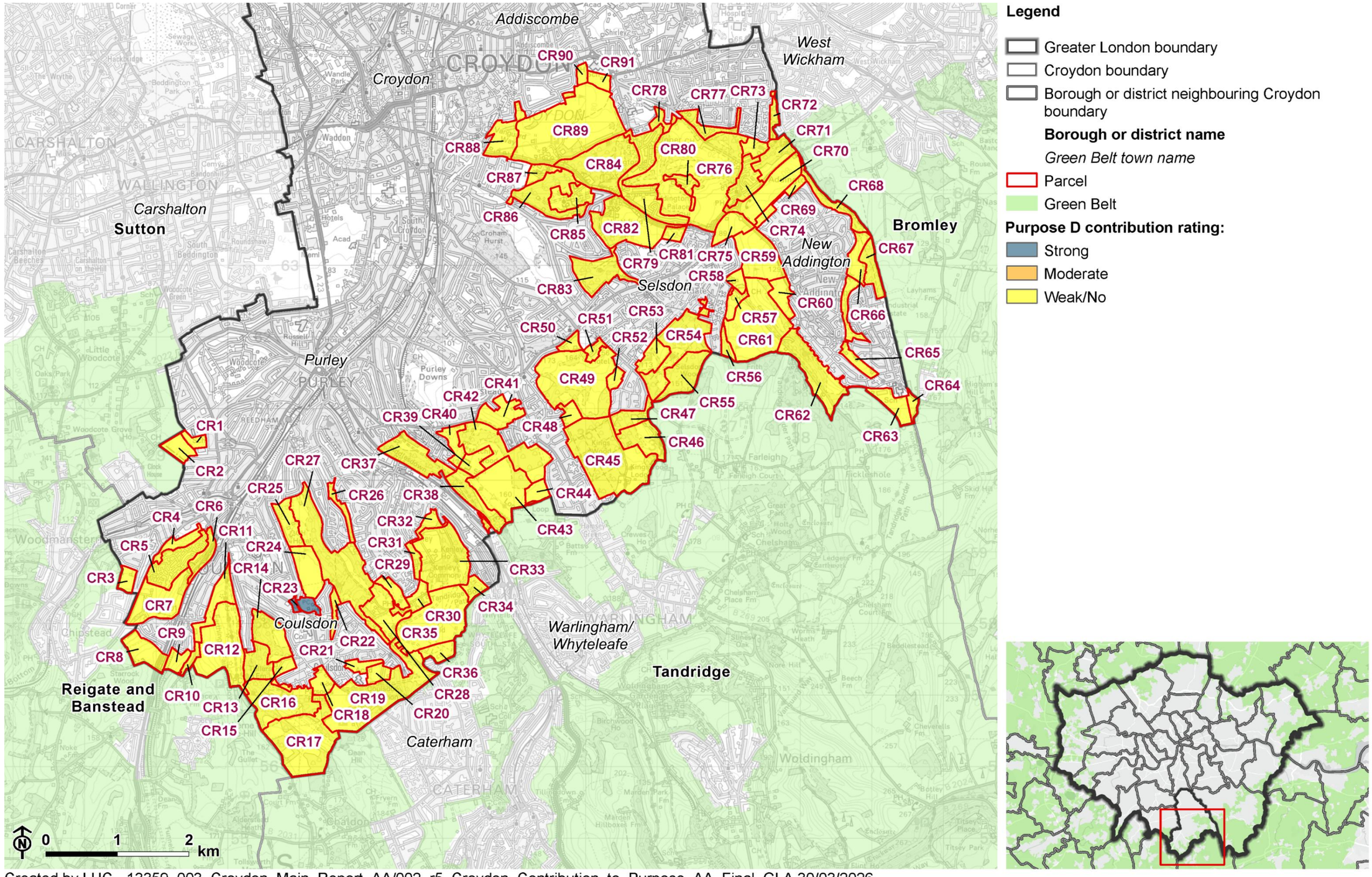
3.163 Based on the above, only one area of the Green Belt land within Croydon is considered to make a contribution to Green Belt Purpose D - the open spaces of Bradmore Green and Grange Park within Bradmore Green Conservation Area which marks the historic core of Old Coulsdon and makes a strong contribution to its setting and special character (CR23).

3.164 Other areas of the borough are considered to make a weak/no contribution to Purpose D. It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristic.

3.165 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.166 Figure 3.34 illustrates the variations in contribution to Purpose D across Croydon.

Figure 3.34: Contribution to Purpose D – Preserve the setting and special character of historic towns



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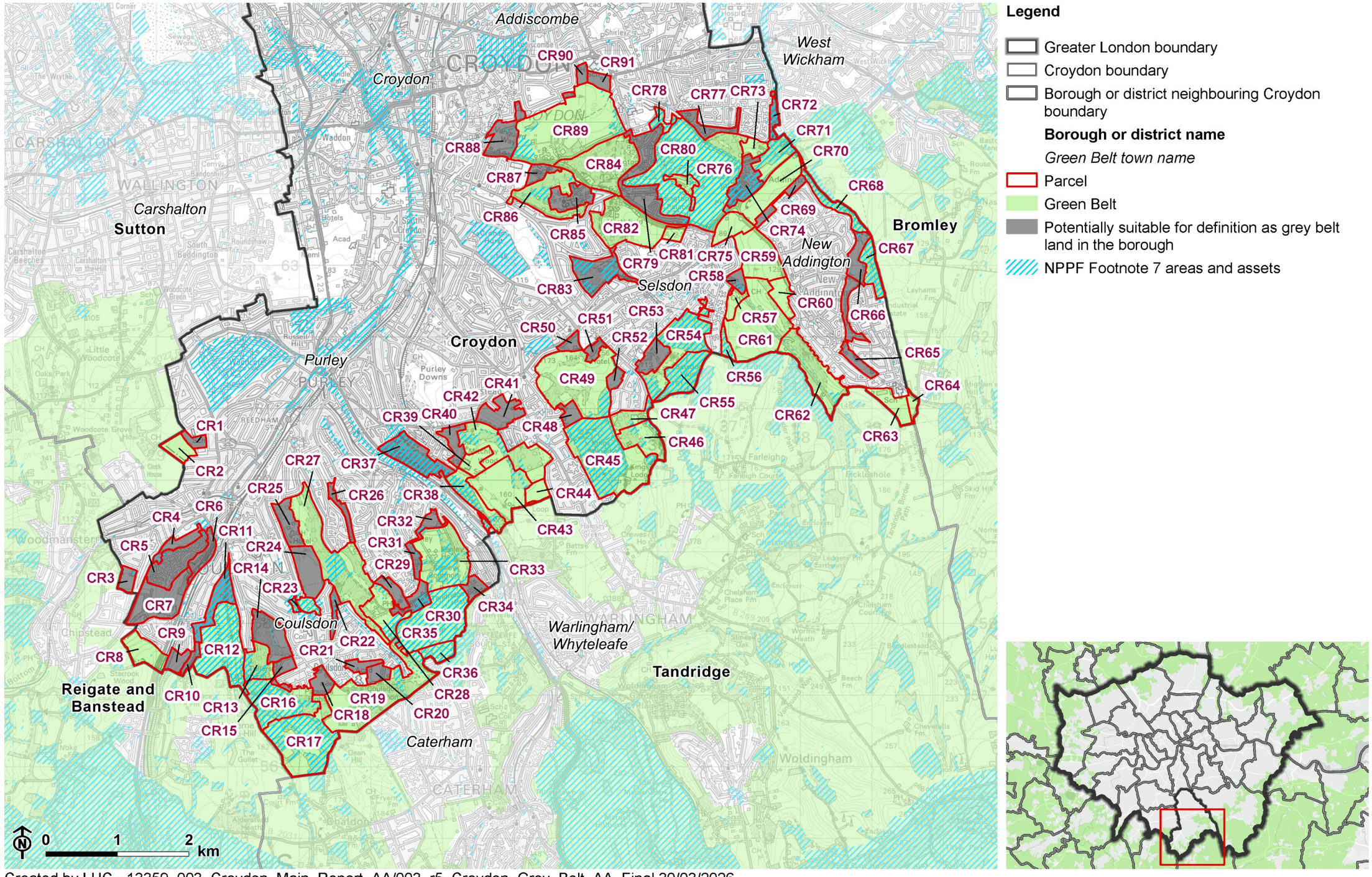
Potential grey belt in the London Borough of Croydon

3.167 Having regard to the definition set out in the NPPF, the following areas of Croydon are defined as having potential for definition as grey belt land subject to further work by the borough:

- Land largely contained and/or urbanised by the urban area of Purley (CR1).
- Land largely contained and/or urbanised by the urban areas of Coulsdon and Sanderstead (parcels CR3-CR7, CR9-CR11, CR14, CR15, CR18, CR20-CR22, CR24-CR26, CR29-32, CR34, CR37, CR40 and CR41).
- Land largely contained and/or urbanised by the urban areas of Selsdon, Forestdale and New Addington (parcels CR48, CR50-CR53, CR58, CR65, CR66, CR69 and CR83).
- Land largely contained and/or urbanised by of Croydon, Addington, West Wickham, Spring Park and Shirley (parcels CR72, CR74, CR77, CR79, CR85, CR87, CR88, CR90 and CR91).

3.168 Figure 3.35 illustrates the area potentially suitable for definition as grey belt land within Croydon.

Figure 3.35: Green Belt land potentially suitable for definition as grey belt land



Legend

- Greater London boundary
- Croydon boundary
- Borough or district neighbouring Croydon boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets

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Highest and lowest contributing Green Belt land

3.169 The majority of Green Belt in Croydon makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include open land:

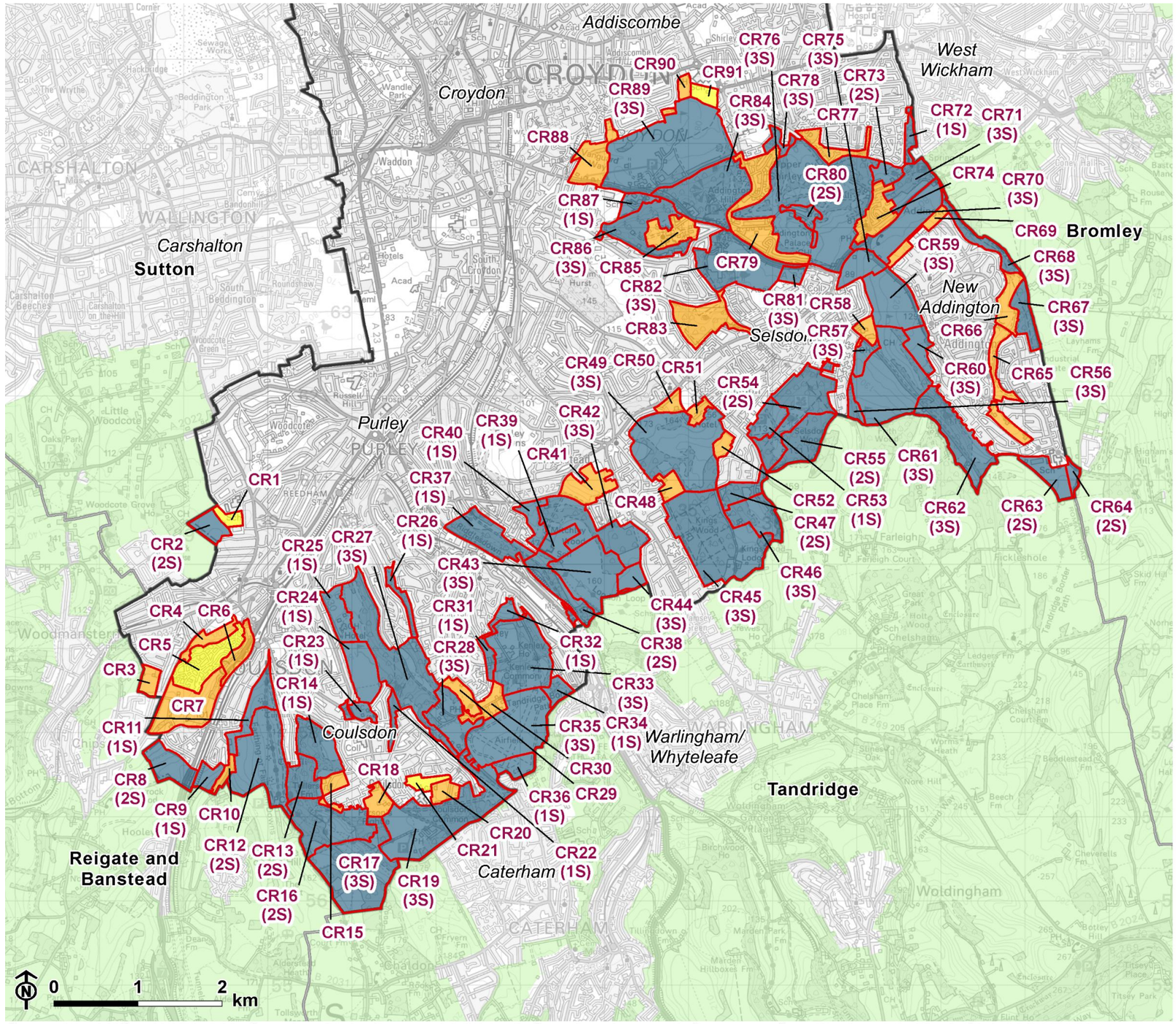
- South and west of Coulsdon (parcels CR2, CR8, CR12, CR13, CR16, CR17 and CR19) make strong contributions to purposes A and C. Parcels CR17 and CR19 also make a strong contribution to Purpose B.
- The open wooded parts of the dry valleys and slopes (parcels CR27, CR28 and CR33) and the majority of the prominent open Kenley Airfield (CR35) between Coulson and Warlingham/Whyteleafe (including via Kenley) make a strong contribution to purposes A, B and C and, in addition to parcels CR22, CR24, CR25, CR26, CR31 and CR32, a strong contribution to purpose C. Parcels CR27, CR28, CR33 and CR35 also make a strong contribution to purpose B, and parcel CR23 makes a strong contribution to purpose D.
- Within the wooded dry valleys to the south of Sanderstead, lying between Coulsdon, Whyteleafe/Warlingham and Selsdon (including via Sanderstead) parcels CR42-CR46 and CR49 make a strong contribution to purposes A, B and C and adjacent parcels CR38 and CR47 make a strong contribution to purposes A and C.
- South of Seldon, between Selsdon (including Forestdale) and New Addington parcels CR54-CR57, CR59-CR62 make a strong contribution to purposes A and C, with some (parcels CR56, CR57 and CR59-CR62) also making a strong contribution to purpose B.
- Between the urban areas of Croydon, Shirley, Addington, Selsdon (including Forestdale) and West Wickham parcels CR70, CR71, CR73, CR75, CR76, CR78, CR81, CR82, CR84, CR86 and CR89 make a strong contribution to purposes A, B and C. Parcel CR80 makes a strong contribution to purposes A and B.
- To the east and south of New Addington (parcels CR63, CR64, CR67 and CR68) make a strong contribution to purposes A and C, with parcels CR67 and CR68 also making a strong contribution to Purpose B.

3.170 The areas within Croydon that contribute the least to the Green Belt purposes tend to be inappropriately developed Green Belt land where there is a distinct lack of openness (parcels CR5 and CR91), or particularly contained and urbanised pockets land associated with urban areas, and more isolated from the wider open countryside

(parcels CR1 and CR21). These areas make no more than a weak/no contribution to the Green Belt purposes.

3.171 Figure 3.36 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong or strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.36: Highest contribution to NPPF Green Belt purposes



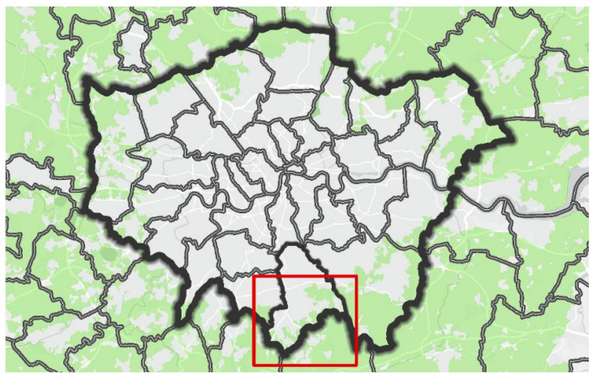
Legend

- Greater London boundary
- Croydon boundary
- Borough or district neighbouring Croydon boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.172 In light of the scale and contiguity of Green Belt land in Croydon and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up areas of Greater London with New Addington to the south-east would have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Coulsdon (including Old Coulsdon) and Caterham on the Hill/Caterham Valley.
  - Selsdon (via Forestdale) and New Addington.
  - New Addington and West Wickham.
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release or development of open land that forms an important part of the setting and special character of Old Coulsdon (Bradmore Green Conservation Area) would likely have a fundamental impact on Purpose D.

Ealing

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.173 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

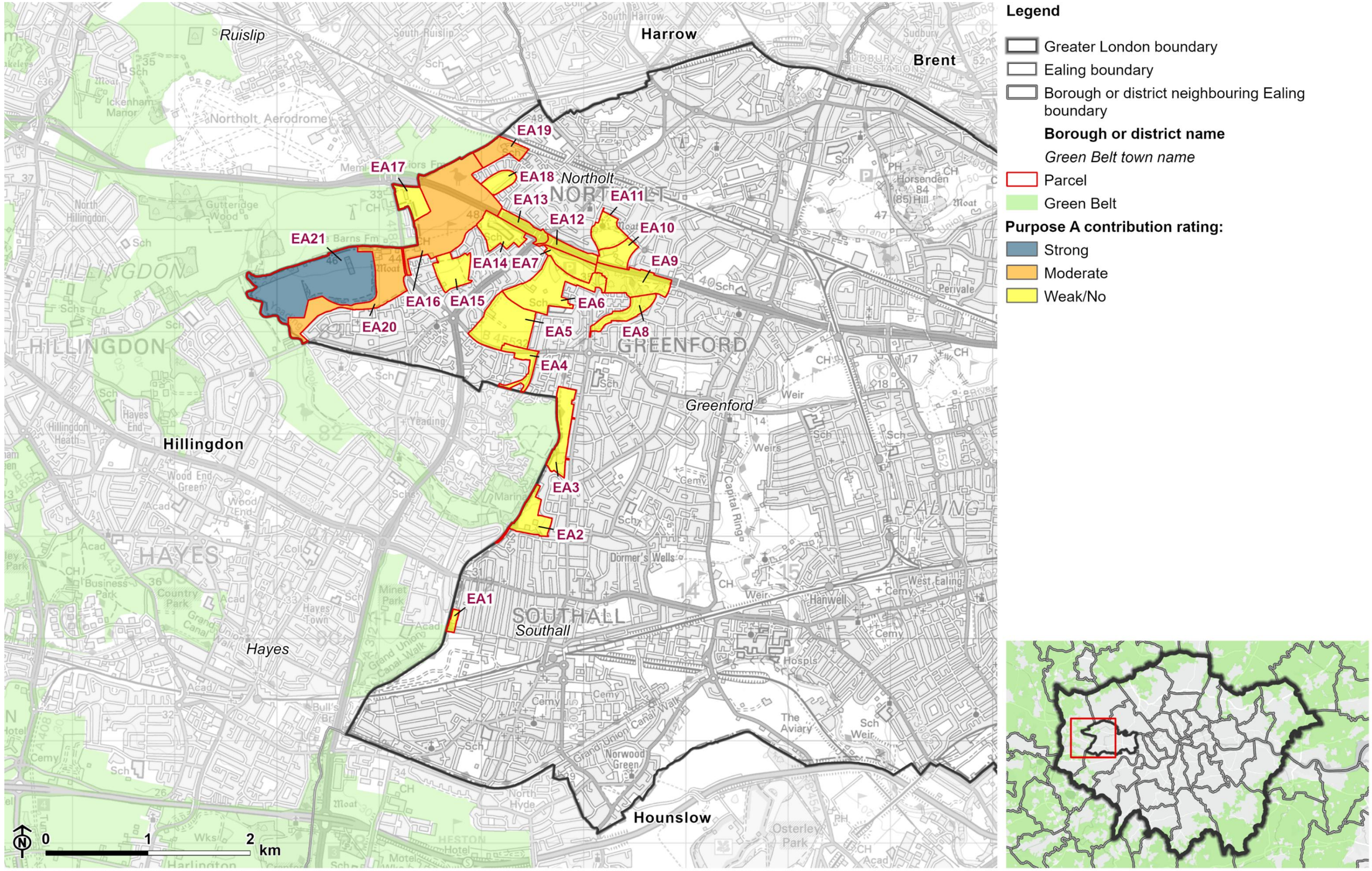
3.174 Only the open land east of Hillingdon and southwest of Northolt containing the West London Shooting School (EA21) makes a strong contribution to this purpose. Its embankments and surrounding woodland maintain separation from and retain the large built area to the south and south-east such that development of the areas would have an incongruous impact on the urban pattern.

3.175 Green Belt land that is particularly contained and/or urbanised by the surrounding urban area make a weak/no contribution to Purpose A. This includes all of the Green Belt land south and east of and including the Alec Reed Academy (EA14), as well as the contained land east of Islip Manor Meadows (EA18) and the SKLPC Sports and Community Centre and Playing fields (EA17).

3.176 The larger more central pockets of open countryside north and west of the Alec Reed Academy (EA14) make a more moderate contribution in acknowledgement of the fact that they generally have either a stronger relationship with the wider countryside despite some urbanising influence from adjacent urban areas.

3.177 Figure 3.37 illustrates the variations in contribution to Purpose A across Ealing.

Figure 3.37: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.178 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

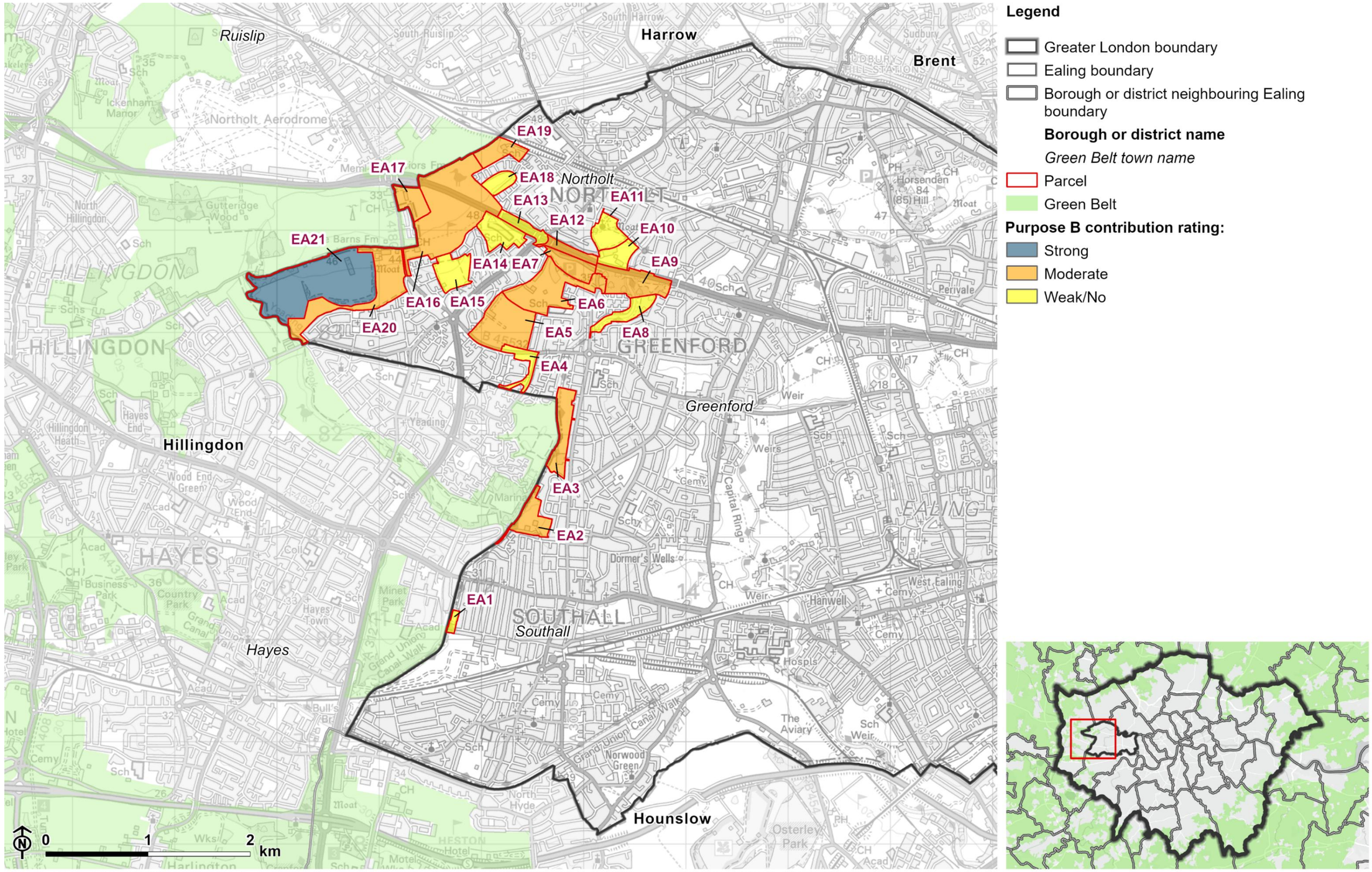
3.179 Only the open land east of Hillingdon and southwest of Northolt containing the West London Shooting School (EA21) makes a strong contribution to this purpose. Its embankments and surrounding woodland represent a substantial part of the gap between Hillingdon and Hayes to the south and Ruislip and Northolt to the northeast. Development in this area would therefore result in the loss of visual separation between towns.

3.180 The majority of Green Belt land in the borough makes a more moderate contribution to this purpose as a result of the majority of the Green Belt within the borough falling within less direct gaps between neighbouring towns. The open Green Belt land east of the Grand Union Canal, east of Yeading and west of Greenford only partially maintains separation between Greenford and neighbouring Hayes in the neighbouring London Borough of Hillingdon (parcels EA2 and EA3). The north eastern area of open Green Belt land is also very contained such that it only partially maintains remnant separation between Northolt and Greenford and the neighbouring of Hayes (via Yeading) in the neighbouring London Borough of Hillingdon (parcels EA5, EA6, EA7, EA9 and EA12). The north western Green Belt land west of Northolt maintains separation in a wider generally more moderate gap between Northolt and the neighbouring Annex 1 town of Ruislip in the neighbouring London Borough of Hillingdon (parcels EA16, EA17, EA19 and EA20).

3.181 Land that is notably developed or contained by urban development such that no notable gap between towns remains and/or is peripheral to partial and more moderate gaps make a weak/no contribution to this purpose, including parcels EA1, EA4. EA8, EA10, EA11, EA12, EA14, EA15 and EA18.

3.182 Figure 3.38 illustrates the variations in contribution to Purpose B across Ealing.

Figure 3.38: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.183 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

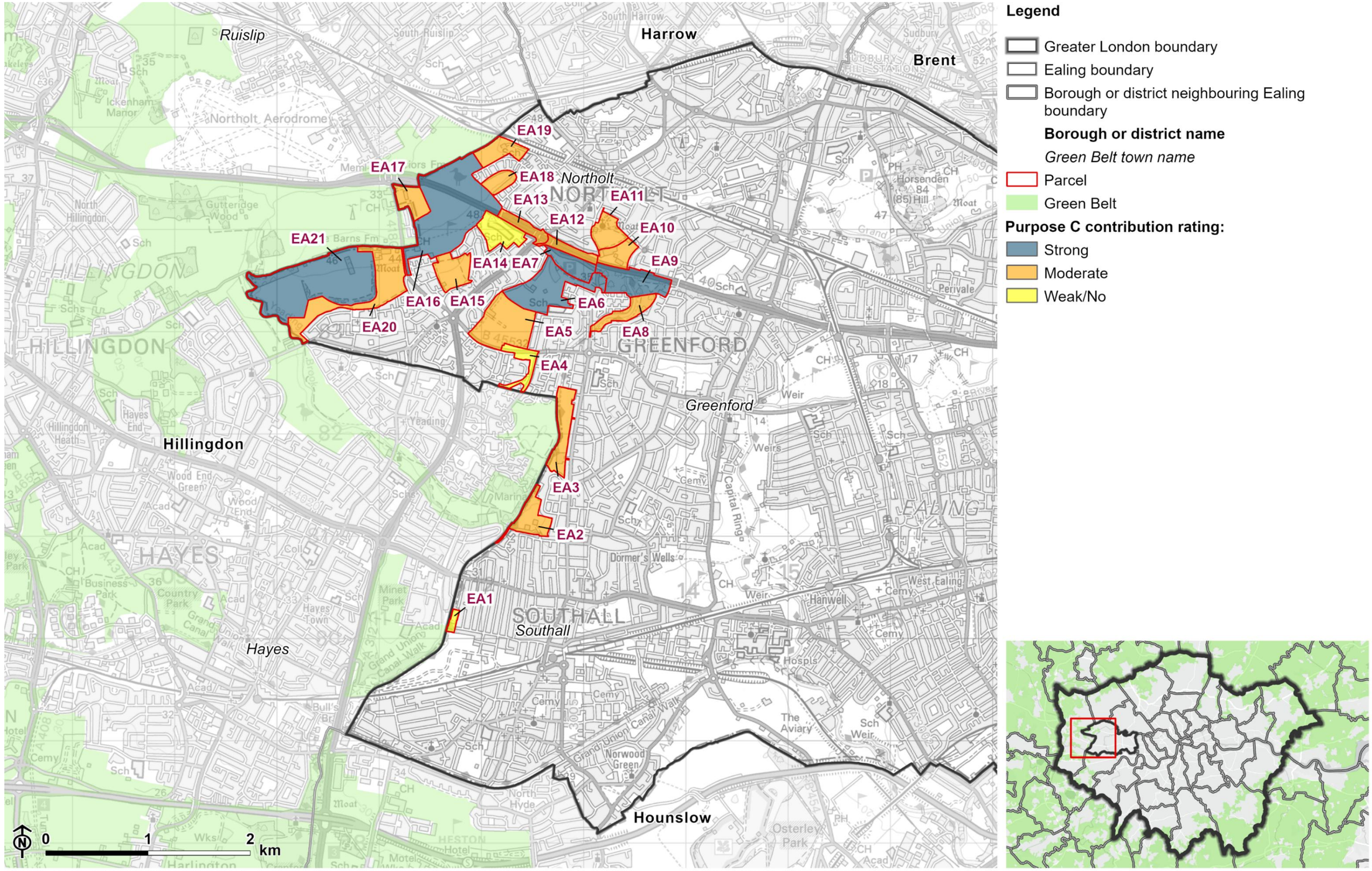
3.184 The open land east of Hillingdon and southwest of Northolt containing the West London Shooting School (EA21) and the larger pockets of open countryside along the A40 (parcels EA6, EA7, EA9 and EA16) make a strong contribution to Purpose C. Although these locations have some relationship with the neighbouring containing urban areas, their central locations are important in maintaining the wider integrity and visual and physical connectivity of the countryside in the Borough. Development in these locations has greater risk of exerting an urbanising influence on the wider countryside, including severing the physical and visual connection adjacent but more contained open pockets of Green Belt land have with the wider open countryside to the west.

3.185 The rest of the borough makes a moderate or weak contribution to Purpose C by virtue of one, or a combination, of the following:

- Their land use, which is appropriate in the Green Belt, but is more associated with the urban area. For example Rectory Park (EA5).
- Their containment by the urban edge or other urbanising development. For example, the Alec Reed Academy and Jon Chilton School playing fields (EA14) and Blair Peach Primary School playing fields and adjacent allotments (EA1) or the urbanised open space along Broadmead Road up to and including Rectory Park Football Centre north of Ruislip Road (EA4).

3.186 Figure 3.39 illustrates the variations in contribution to Purpose C across Ealing.

Figure 3.39: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.187 A review of relevant historic designations within and adjacent to the borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the borough contains and lies adjacent to five settlements large enough to be considered towns in Green Belt terms: Greenford, Hayes, Northolt, Ruislip and Southall.

3.188 Within these urban areas there are a number of conservation areas, the majority of which are located deep within the large built-up urban areas and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt. These areas tend to be focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points). Some other conservation areas protect formerly separate village centres (e.g. Norwood Green) which, whilst now having been subsumed within the wider area of a town, have special interests relating to their remnant village character and are therefore not considered relevant to the setting and special character of a historic town.

3.189 Notable exceptions include the conservations areas located within wider Green Belt town areas that lie adjacent to and/or include areas of Green Belt land, specifically the **Northolt Village Green Conservation Area**, which covers historic parts of Northolt. The area lies partly within the Green Belt and contains a Scheduled Monument (Northolt Manor, moated site) to the east. The Northolt Village Green Conservation Area Appraisal (2007) notes that historic significance of the area ‘is primarily as the site of an ancient moated manor, occupied from Saxon times, with, most importantly above ground, the C13 St. Mary’s Church’. It adds that ‘the survival of the ancient rural village provides the basis for the conservation area designation’ and that ‘within its boundaries a visitor finds a peaceful, picturesque landscape, isolated from its densely developed urban surroundings’. Key views within the conservation area include from the south-west edge of Belvue Park, looking north-east; and from the eastern edge of the moat, looking west.

3.190 Based on the above, only one area of the Green Belt land within the borough is considered to make a strong contribution to Green Belt Purpose D is Belvue Park (EA11). The Green Belt land immediately to the south of this area (EA10) is largely developed and not considered to contribute to the wider setting of the park.

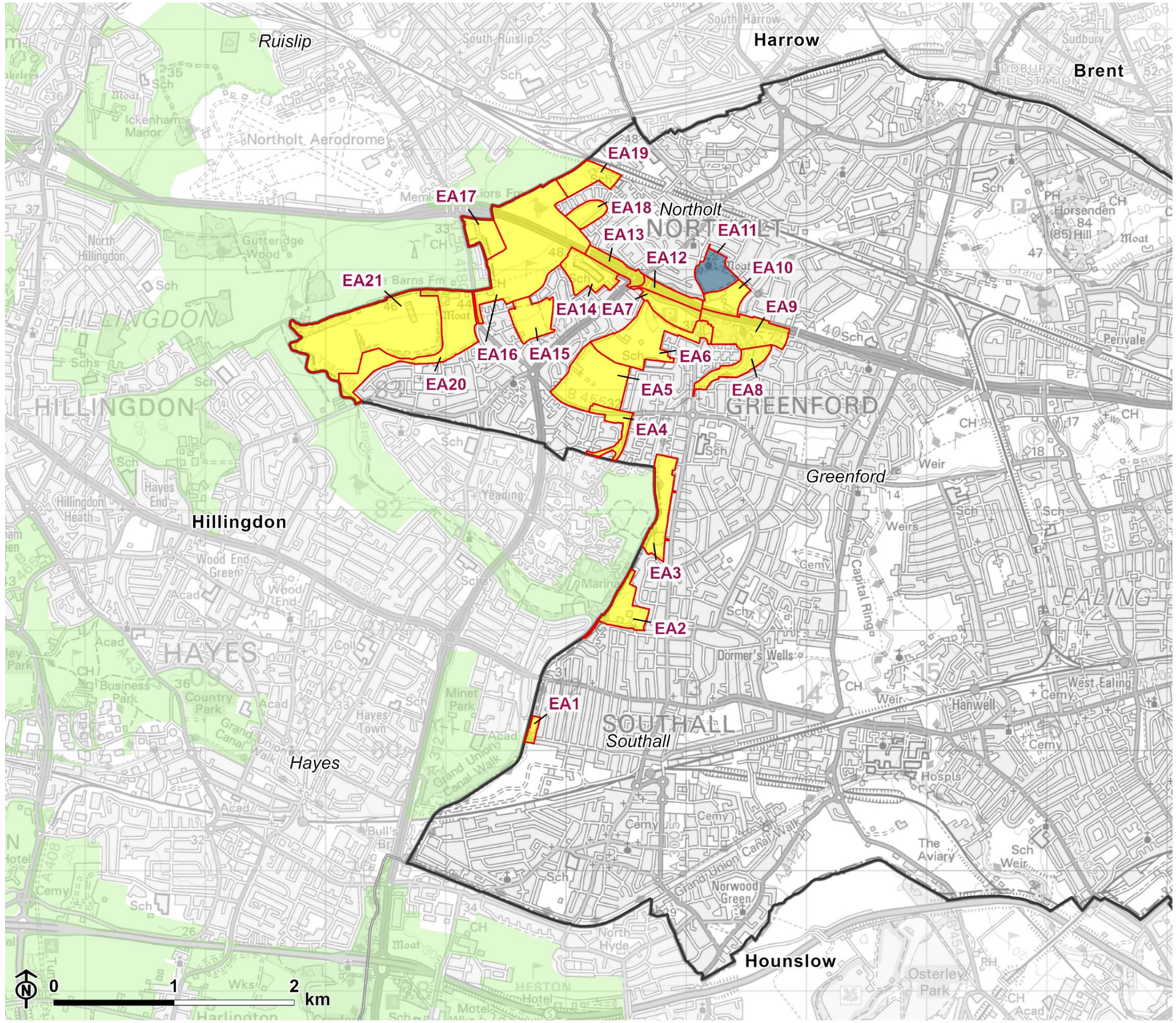
3.191 It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green

Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.192 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.193 Figure 3.40 illustrates the variations in contribution to Purpose D across Ealing.

Figure 3.40: Contribution to Purpose D – Preserve the setting and special character of historic towns

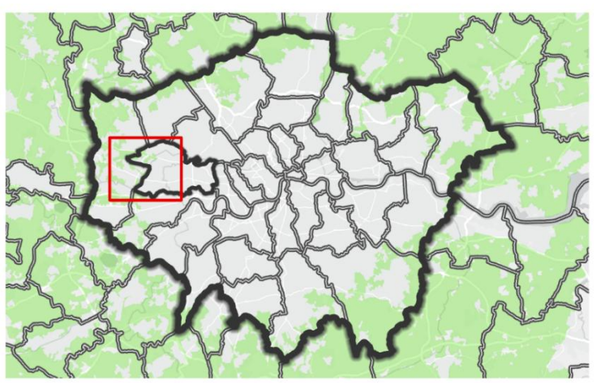


Legend

- Greater London boundary
- Ealing boundary
- Borough or district neighbouring Ealing boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose D contribution rating:

- Strong
- Moderate
- Weak/No



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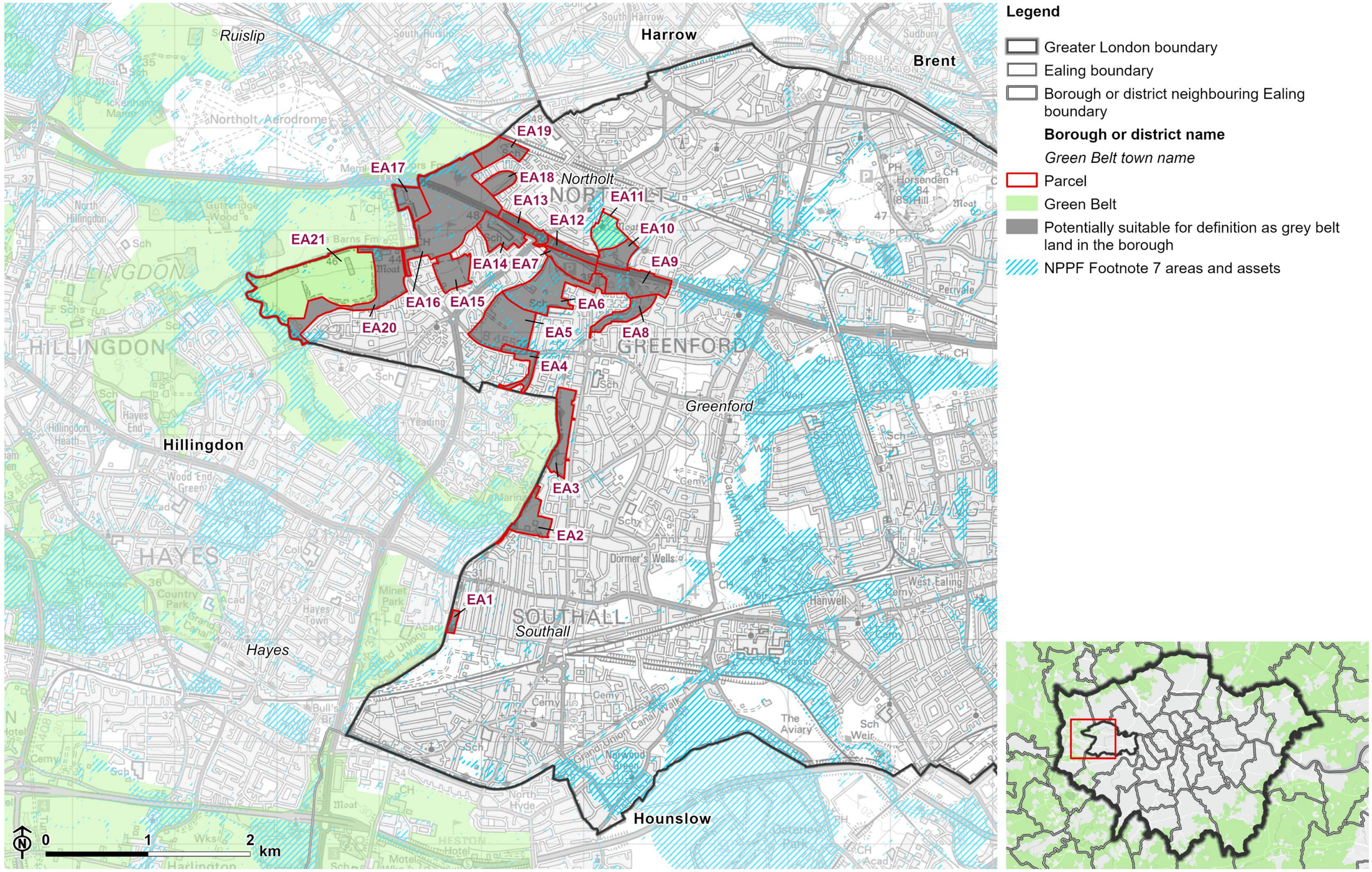
Potential grey belt in the London Borough of Ealing

3.194 Having regard to the definition set out in in the NPPF, the vast majority of the boroughs Green Belt land potential for definition as grey belt land subject to further work by the borough. The only notable exceptions include:

- Open land east of Hillingdon and southwest of Northolt containing the West London Shooting School (EA21). This area makes a strong contribution to purposes A, B and C.
- Belvue Park, St Mary's Church and cemetery and Northolt Village Memorial Hall (EA11). This area makes a strong contribution to Purpose D.

3.195 Figure 3.41 illustrates the area potentially suitable for definition as grey belt land within Ealing.

Figure 3.41: Green Belt land potentially suitable for definition as grey belt land



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Highest and lowest contributing Green Belt land

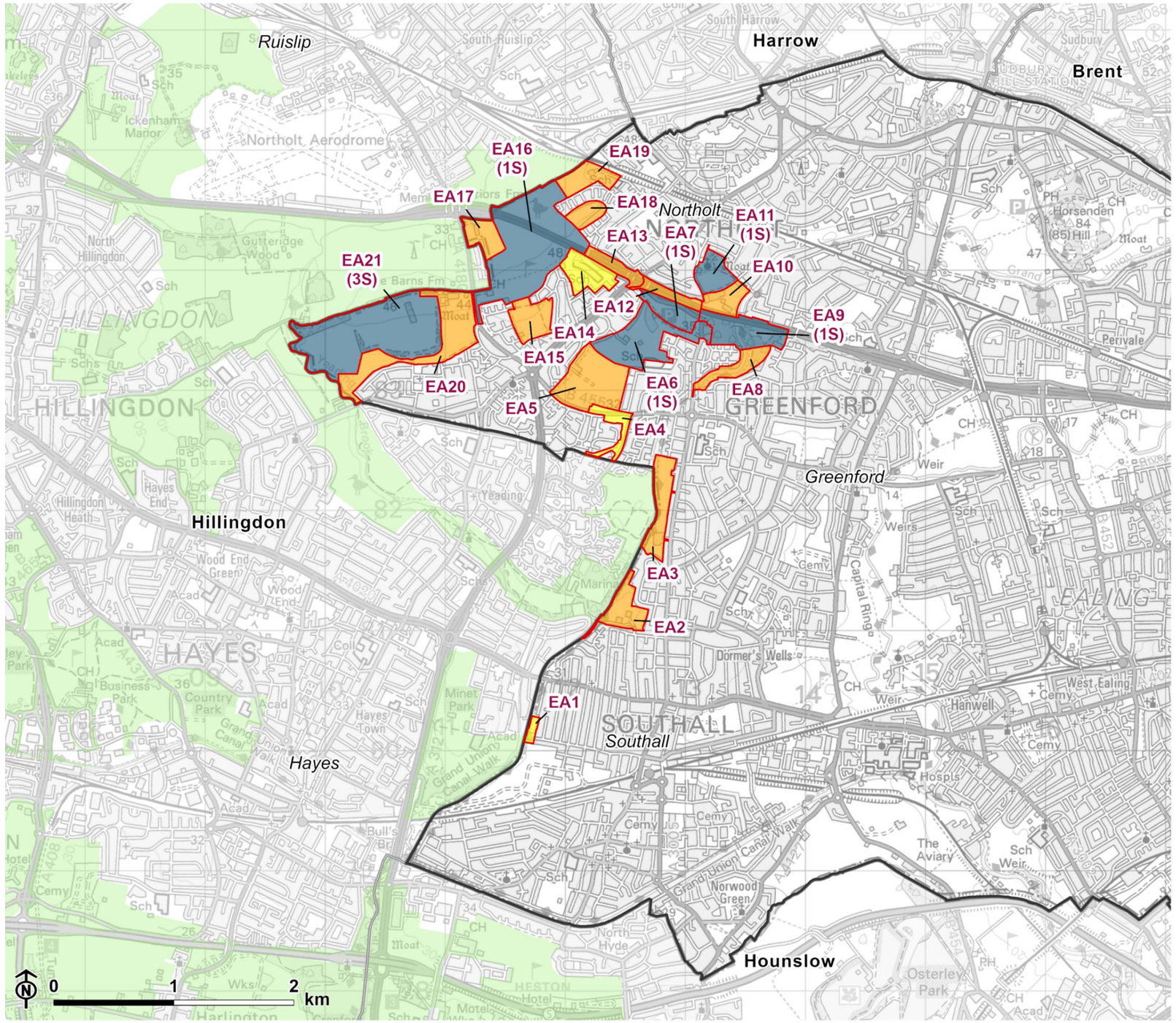
3.196 The majority of the Green Belt in Ealing does not makes a strong contribution to the Green Belt purposes. Only one area of Green Belt makes a strong contribution to multiple Green Belt purposes. The open land east of Hillingdon and southwest of Northolt, containing the West London Shooting School (EA21), where its embankments and surrounding woodland maintain. This area makes a strong contribution to purposes A, B and C.

3.197 The areas within Ealing that contribute the least to the Green Belt purposes are developed and significantly urbanised contained pockets of Green Belt that are associated with adjacent urban areas. The following areas make no more than a weak/no contribution to the Green Belt purposes:

- Blair Peach Primary School and allotments (EA1).
- The notably contained and urbanised open space along Broadmead Road up to and including Rectory Park Football Centre north of Ruislip Road (EA4).
- The Alec Reed Academy and Jon Chilton School (EA14).

3.198 Figure 3.42 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.42: Highest contribution to NPPF Green Belt purposes



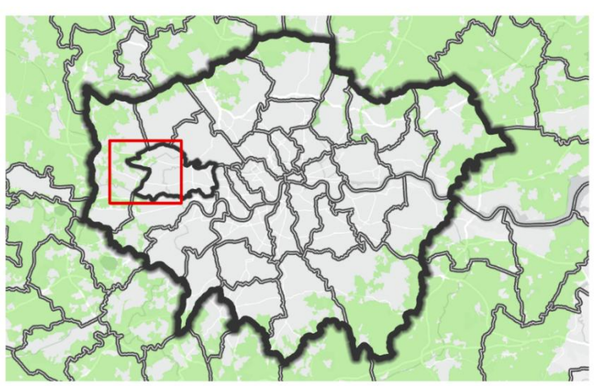
Legend

- Greater London boundary
- Ealing boundary
- Borough or district neighbouring Ealing boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.199 In light of the scale and contiguity of Green Belt land in Ealing and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of the vast majority of all the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release or development of Belvue Park (EA11) would likely have a fundamental impact on Purpose D.

3.200 Release or development of the open land east of Hillingdon and southwest of Northolt containing the West London Shooting School and surrounding woodland and fields (EA21) is unlikely to have an fundamental impact in isolation due to the fact that the wider open area is contained within the large built up area of Greater London and open Green Belt land could remain to the north, maintaining separation between Hillingdon and Hayes to the south and Ruislip and Northolt to the northeast.

Enfield

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.201 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

3.202 The majority of the borough's Green Belt land makes a strong contribution to Purpose A by virtue of its strong separation from neighbouring urban areas and relationship with the wider open countryside. This includes:

- The wooded and open rolling ridges of Trent Park, Enfield Chase and north and south of the Ridgeway (parcels EN4, EN10 and EN23).
- Whitewebbs Park, Whitewebbs Wood and the open Whitewebbs farmland and the wooded valley of the Turkey Brook west of Bull's Cross (EN44).

3.203 Parcel EN37 makes a strong contribution to Purpose A in large part due to the important role in plays in in inhibiting ribbon development along or in the vicinity of Clary Hill Road, which would have a notably significant narrowing influence between

the large built up area and Clay Hill/Crews Hill, increasing their combined sprawling influence.

3.204 Release and development in these locations near to the large built up area would represent notable sprawl, breaching strong retaining boundary features currently inhibiting incongruous patterns of development.

3.205 The same can be said for the thin wooded island in between the western and eastern courses of the River Lea in the far north-east of the borough (EN56), which also makes a strong contribution to Purpose A. In addition, however, release and development in this location also risks merging Greater London with Waltham Abbey, increasing their combined sprawling influence.

3.206 Large parts of the borough's Green Belt makes a strong contribution to Purpose A. These locations lie in closer proximity to the large built up area and its urbanising influences but are still sufficiently open that they represent a strong front line in preventing the sprawl of the large built-up area. This includes:

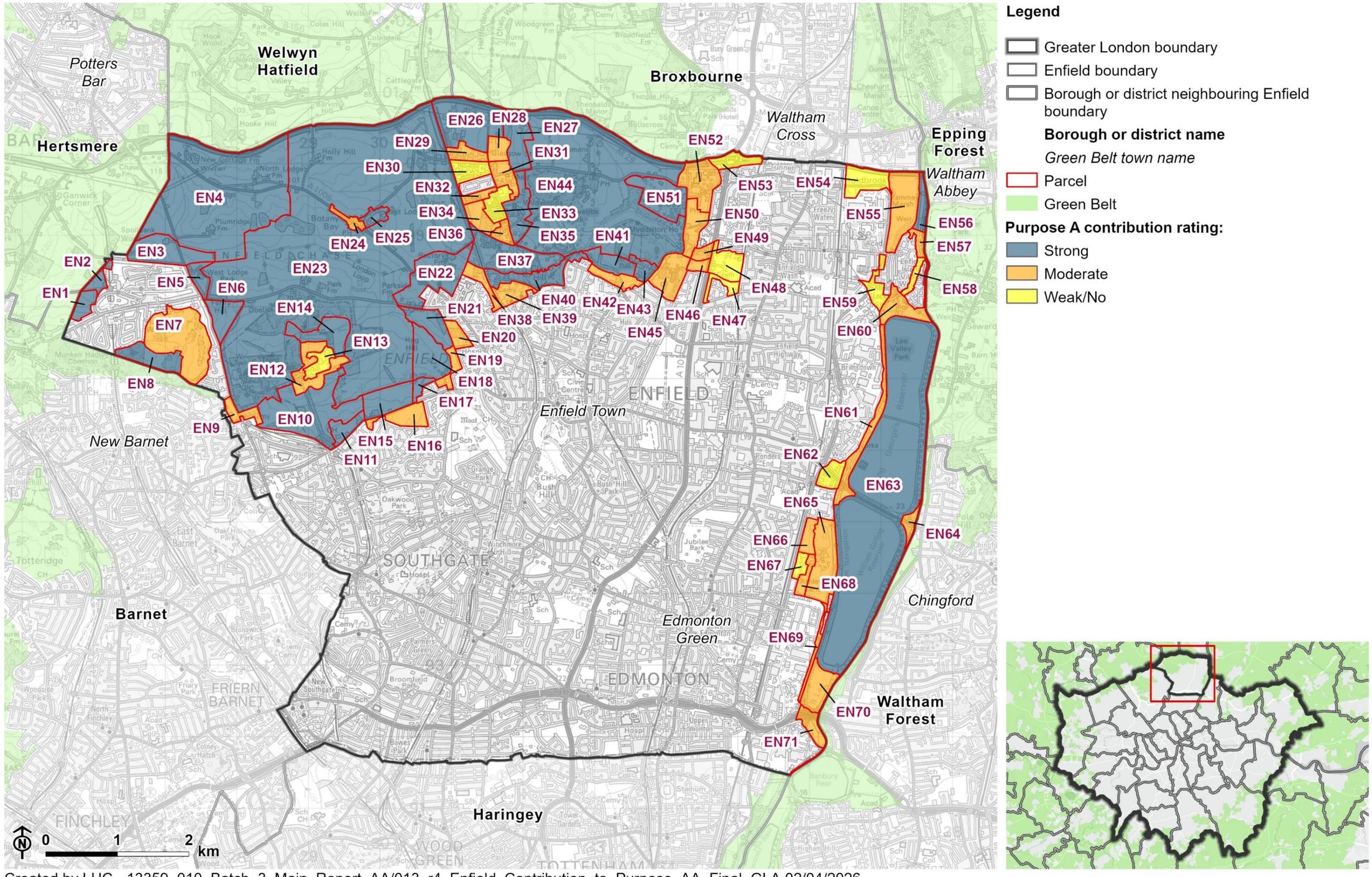
- The open Green Belt land surrounding Hadley Wood (parcels EN1 to EN6 and EN8).
- The less wooded and consequently more visually open countryside adjacent to the main urban edges of Oakwood (parcels EN11 and EN15), the new Trent Park residential estate (EN14), Worlds End (parcels EN17, EN18, EN21 and EN22), Botany Bay (EN25), Crews Hill (parcels EN26, EN27 and EN35), Clay Hill (parcels EN37 and EN40) and Forty Hill (parcels EN41 and EN43).
- The Tottenham Hotspur Football Club Training Ground (EN51).
- The William Girling and King George's Reservoirs in the east of the borough (EN63).

3.207 Green Belt land that is particularly developed (parcels EN13, EN30, EN33 and EN67) with limited openness or significantly contained and urbanised by neighbouring urban areas such that they have no notable relationship with the wider open countryside (parcels EN47 and EN48, EN53 and EN54, EN58 and EN59) or a combination of the two (EN62) make a weak/no contribution to Purpose A.

3.208 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more contained and/or urbanised by urban areas but are still generally open and sufficiently distinct from the large built up area that development would have some sprawling influence.

3.209 Figure 3.43 illustrates the variations in contribution to Purpose A across Enfield.

Figure 3.43: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.210 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.211 The areas that make a strong contribution are the least urbanised and open parcels in the narrowest and therefore most fragile gaps between neighbouring towns. Parcels that make a strong contribution to Purpose B include:

- Parcels EN55 and EN56 make a strong contribution to Purpose B, maintaining separation between the neighbouring towns of Enfield, Waltham Cross and Waltham Abbey.
- Parcel EN63, EN65, EN70 and EN71 make a strong contribution to Purpose B, maintaining separation between the neighbouring towns of Enfield/Edmonton Green and Chingford.

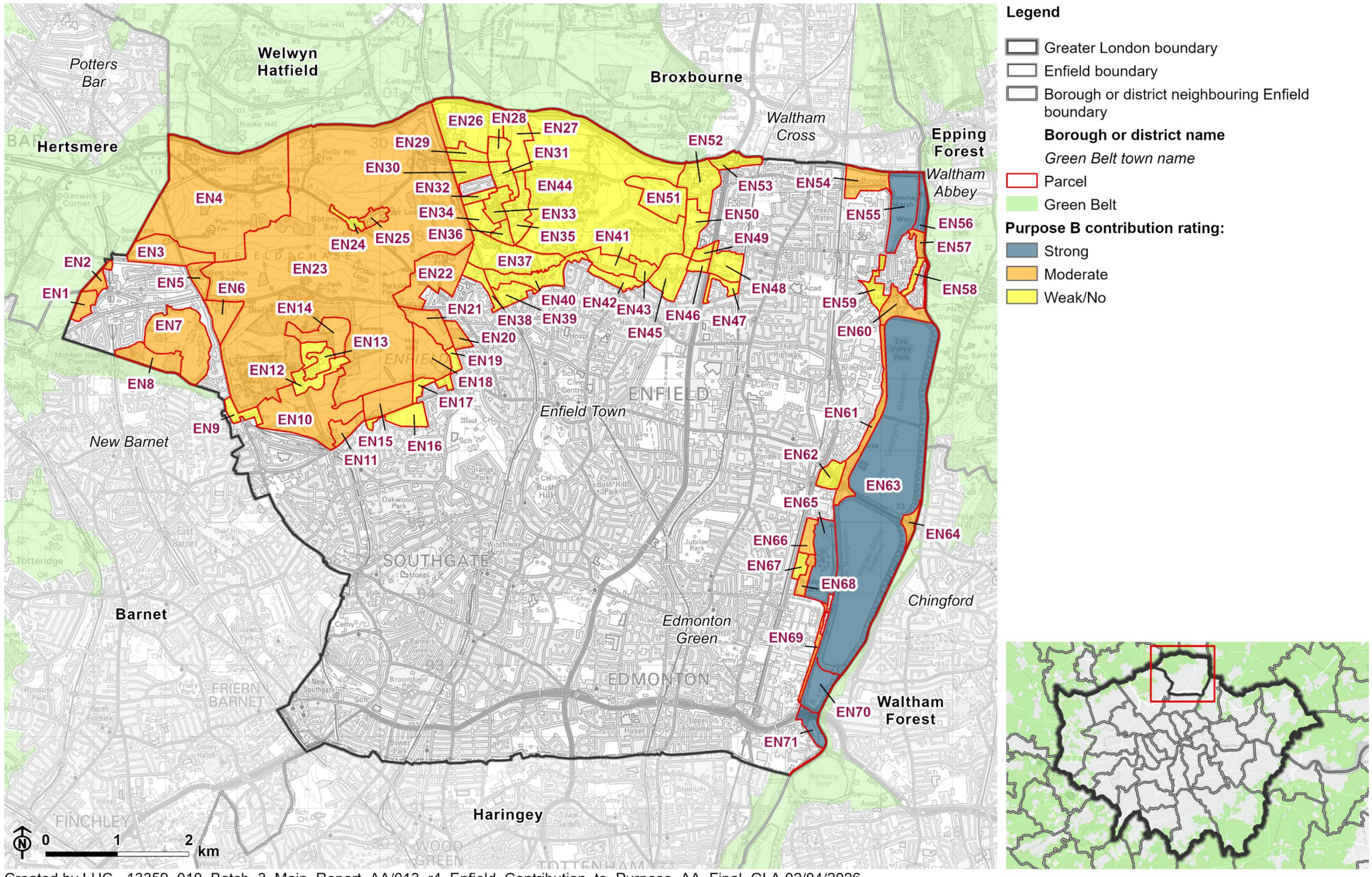
3.212 All Green Belt land in between the railway lines west of Crews Hill and east of Enfield Cemetery and Hoe Green Park make a weak/no contribution to Purpose B. This large area of Green Belt land in the northern central portion of the borough lies within what remains of the robust western gap between Enfield and Waltham Cross/Cheshunt, which are already merged to the east via the Great Cambridge Road and Hertford Road. In addition, Green Belt land that is particularly developed (parcels EN13, EN24, and EN67) or contained and urbanised by the surrounding urban area such that do not lie in notable open gaps between neighbouring towns (parcels EN9, EN12, EN16 and EN17, EN19, EN58 and EN59), or a combination of the two (EN62) also make a weak/no contribution to Purpose B.

3.213 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as:

- Open Green Belt land in the moderate gap between New Barnet/Enfield and Potters Bar via Hadley Wood (parcels EN1 to EN4 EN7 and EN8).
- Open Green Belt land peripheral to the moderate gap between New Barnet/Enfield and Potters Bar via Hadley Wood, in a wider gap between Enfield and Potters Bar connected via The Ridgeway (parcels EN5 and EN6, EN10 and EN11, EN14 and EN15, EN18, EN20 to EN23 and EN25.
- Where the land is more contained and urbanised by urban areas or retained by substantial separating features but still generally open and sufficiently distinct that they still play some separating role between closely neighbouring towns (parcels EN54, EN57, EN60, EN61, EN64, EN66, EN68 and EN69).

3.214 Figure 3.44 illustrates the variations in contribution to Purpose B across Enfield.

Figure 3.44: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.215 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

3.216 A majority of the borough's Green Belt land makes a strong contribution to Purpose C by virtue of its strong relationship with the open countryside, openness and lack of urbanising influences. This includes:

- The wooded and open rolling ridges of Trent Park, Enfield Chase and north and south of the Ridgeway (parcels EN4 and EN23).
- Whitewebbs Park, Whitewebbs Wood and the open Whitewebbs farmland and the wooded valley of the Turkey Brook west of Bull's Cross (EN44).

3.217 Release and development in these locations would represent significant encroachment into the more remote open countryside in the borough.

3.218 Release and development in thin wooded island in between the western and eastern courses of the River Lea in the far north-east of the borough (EN56) risks severing the open countryside of Rammey Marsh to the west from the wider open countryside to the east. The same can be said for the William Girling and King George's Reservoirs in the east of the borough (EN63), where release and development would risk severing the open countryside in the southern parts of the Lee Valley from the wider countryside to the north. Consequently, both parcels also make a strong contribution to Purpose C.

3.219 Large parts of the borough's Green Belt makes a strong contribution to Purpose C. These locations lie in closer proximity to urbanising influences but are still sufficiently open that they play an important role in inhibiting encroachment of the countryside within their immediate vicinity. This includes:

- The open Green Belt land surrounding Hadley Wood (parcels EN1 to EN8).
- The less wooded and consequently more visually open countryside adjacent to the main urban edges of Oakwood (parcels EN10, EN11 and EN15), the new Trent Park residential estate (EN14), Worlds End (parcels EN17, EN18, EN20, EN21 and EN22), Botany Bay (EN25), Crews Hill (parcels EN26, EN27 and EN35), Clay Hill (parcels EN37 and EN40) and Forty Hill (parcels EN41 and EN43).
- The Tottenham Hotspur Football Club Training Ground (EN51).

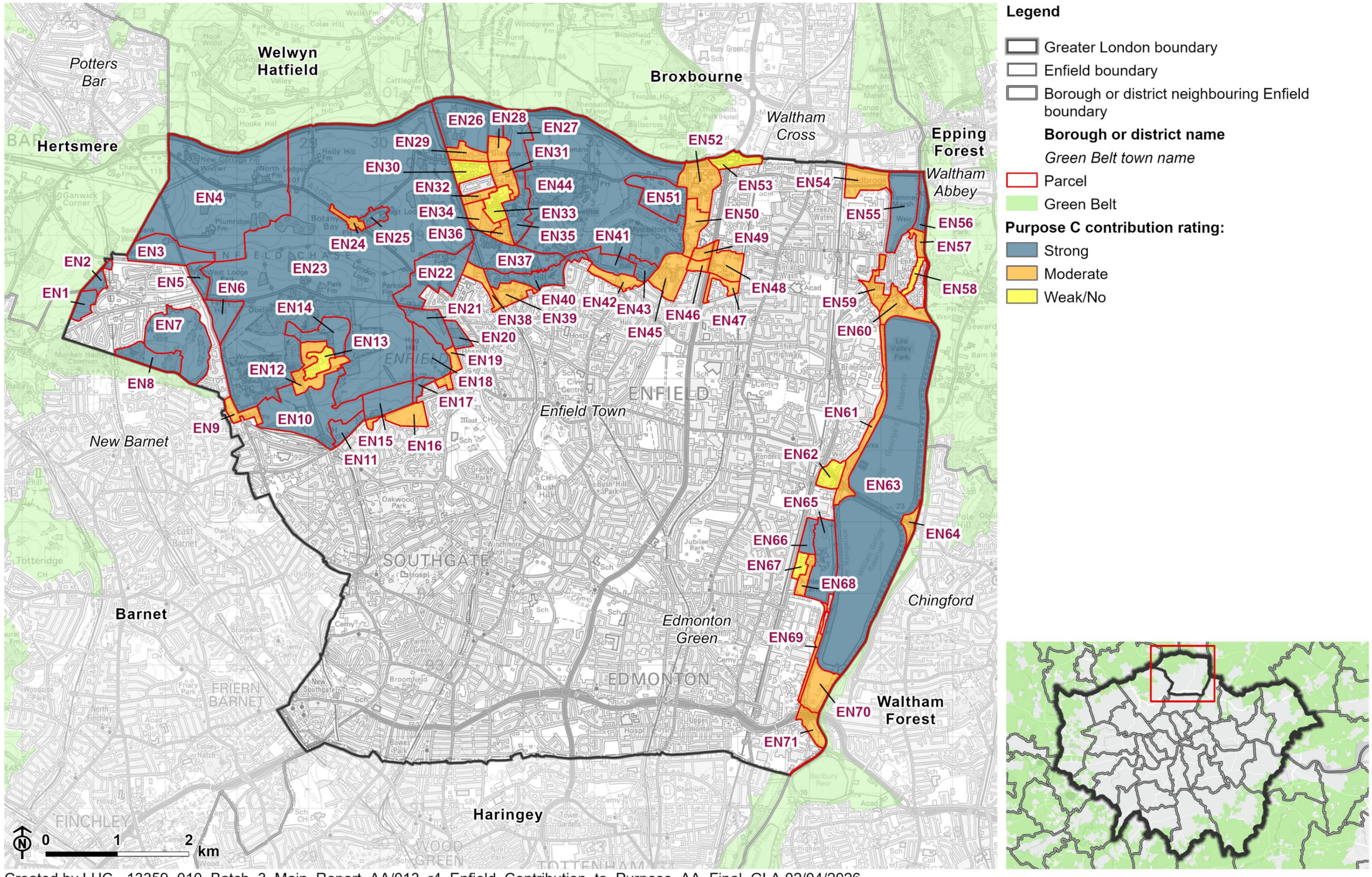
- Rammey Marsh (EN55).
- The Lee Valley Golf Course and Camping and Caravan Park (parcels EN65 and EN66).

3.220 Green Belt land that is particularly developed (parcels EN13, EN30, EN33 and EN67) with limited openness or significantly contained and urbanised by neighbouring urban areas such that they have no notable relationship with the wider open countryside (parcels EN53 and EN58) or a combination of the two (EN62) make a weak/no contribution to Purpose C.

3.221 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more strongly retained by the high reservoir embankments and/or contained by urban areas but is still generally open and sufficiently distinct that development would represent encroachment into the countryside. Other areas may be open but have land uses associated with the urban area rather than the open countryside, such as sports playing fields, cemeteries and allotments and have limited relationship with the wider countryside such that development would not have a wider encroaching influence.

3.222 Figure 3.45 illustrates the variations in contribution to Purpose C across Enfield.

Figure 3.45: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.223 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to seven settlements large enough to be considered towns in Green Belt terms: Chingford, Edmonton Green, Enfield Town, New Barnet, Potters Bar, Waltham Abbey and Waltham Cross. In addition, land to the west of Enfield has some relevance to the setting ad special character of Chipping Barnet. These towns are explored below:

- The GLHLC (2021) identifies an area of 'historic urban core' (intermediate type within the 'urban settlement' broad type) within **Chingford**, in an area also covered by **Chingford Green Conservation Area**. This historic core of the town is centred on the Green, a triangle of former forest land on which stands the 19th century parish church and churchyard of St Peter & St Paul. The Chingford Green Conservation Area Appraisal and Management Plan (2021) notes that the area has special interest as a locality that demonstrates clear evolution and development overtime, from a rural forested settlement, through to Victorian and Edwardian suburbanisation and expansion, as well as some limited later post war development. It retains a strong village feel, with a collection of religious, communal and civic buildings set around the historic Green. The conservation area is located on the high ground at the eastern edge of the Lee Valley and the conservation area appraisal identifies extensive long views out across the reservoirs to the west from the top of Kings Head Hill and from the western end of the Green (View 1).
- With the arrival of the railway in the 1870s the town of Edmonton developed from a modest market town surrounded by open country and small villages to a pattern of suburbs on the edge of London. The **Church Street, Edmonton Conservation Area** covers the eastern end of the B154, which connects the historic centre of Edmonton with that of Enfield (via the A105) to the north. It is centred on the medieval parish church of All Saints, which is all that survived 1960s redevelopment of most of the historic village centre of Lower Edmonton, around Edmonton Green. To the south of this Fore Street is an historic main road leading north from London, which attracted ribbon development from the 17th century and was extensively redeveloped as a commercial and administrative core from the late 19th century. Three separate sections of Fore Street are designated as conservation areas: **Fore Street (North) Conservation Area**, covering Lower Edmonton; **Fore Street (Angel) Conservation Area** covering the Angel, Edmonton; and **Fore Street (South)**

Conservation Area, covering Upper Edmonton. Fore Street runs north-south approximately parallel to and about 2km west of the River Lea. Whilst the landform rises very gently above the flood plain (lying within the Green Belt), the Church Street, Edmonton and Fore Street Edmonton Conservation Area Character Appraisal (2016) notes that *'there are no notable views out'* and that *'the setting is wholly urban, and the hinterland has been increasingly densely developed and redeveloped since the late 19th century'*. The only significant open spaces in the wider area are Pymmes Park, Craig Park and the Montagu Road Cemeteries (the latter covered by **Montagu Cemeteries Conservation Area**) which lie within the urban area.

- Like Edmonton, Enfield developed from a small market town into a suburb on the edge of London following the arrival of the railway in the 1870s. The **Enfield Town Conservation Area** covers the historic core of the town at the junction of Ermine Street (now the A105) and Southbury Road and Windmill Hill (A110). The Enfield Town Conservation Area Character Appraisal (2015) notes that whilst Enfield Town is *'the most densely built up of the Borough's conservation areas'*, it nevertheless *'contains substantial areas of open land within its boundaries - including the last remains of Enfield Chase'*. One of the aspects of the conservation area special interest includes views out from the centre, which provide an awareness of its green setting. However, this relates to green spaces within the surrounding suburban areas not designated as Green Belt (such as the churchyard, school playing fields, parks and the green at the west end of Church Street, and Town Park/Chase Park). The surrounding, later suburban development largely restricts the physical and visual connection between the historic parts of the town and the wider surrounding Green Belt land within Enfield to the north and west.
- As the name suggests, New Barnet is generally a more recent phase of development than Chipping Barnet to the west (see below). The northern part of New Barnet is a Victorian railway development centred on New Barnet Station along East Barnet Road and Station Road. Large scale residential development followed the opening of the railway station in 1872, with further expansion occurring in the early twentieth century. The town does not contain any conservation area designations and lacks a 'historic urban core' (intermediate type within the 'urban settlement' broad type) identified within the Greater London Historic Landscape Characterisation (GLHLC) (2021) and is therefore not considered to be a historic town.
- The GLHLC (2021) identifies an area of 'historic urban core' (intermediate type within the 'urban settlement' broad type) within Chipping Barnet to the west, an area also covered by **Wood Street Conservation Area**. The town developed on a hill with Wood Street following the contour of the hill on an east to west

axis. The conservation area character appraisal statement (2007) notes that 'the elevated position enjoyed by Wood Street allows long range views down side roads to the south over the open countryside of the Dollis Valley' whilst 'to the north … relatively flat and shorter range views into side roads allow an appreciation of the late Victorian urban expansion'. To the north-east of Chipping Barnet lies **Monken Hadley Conservation Area**, which includes the northern end of Chipping Barnet High Street. The Monken Hadley Conservation Area Appraisal Statement (2007) notes that the area 'has managed to retain its special green and leafy character, with so much open space, in sharp contrast with much of suburban London' and that 'Its winding lanes and scattered groups of native trees are set among a traditional English landscape of ancient commons, old hedgerows and open fields'. The area therefore forms a distinctive landscape setting to the north-east of Chipping Barnet. This area also includes the Battle of Barnet 1471 Registered Battlefield which, as the name suggests, has a historical association with the town.

- Potters Bar is located within Hertsmere District to the north of Enfield. The origins of the Potters Bar settlement itself stem from the creation of Enfield Chase, a Royal deer breeding and hunting ground first enclosed in approximately 1140 by King Henry II. Up until 1835 Potters Bar was a very small settlement along the Great North Road (today the A1000) but began to be developed substantially following the construction of the Great Northern Railway in 1850. Further development of the town took place in subsequent decades including after the completion of the M25 Motorway to the south of the town in the 1980's. Today the historic part of the settlement along High Street and Barnet Road (A1000) is marked only by a handful of listed buildings. This area is surrounded by later development which, along with the M25, largely restricts the physical and visual connection with wider surrounding Green Belt, including that within Enfield to the south and south-east. The only conservation area within Potters Bar that lies in reasonable proximity to Green Belt land in Enfield is **The Royds Estate, Potters Bar Conservation Area**, which is a surviving example if 1930s speculative privately funded development. However, the special interest of this area is related predominantly to the estate's planned layout and distinctive 1930s housing, with no mention in the conservation area appraisal (2014) of any relationship with the surrounding countryside.
- Waltham Abbey is a small market town lying on a gravel terrace between the River Lee and the rising ground of Epping Forest. The historic core of the town is covered by **Waltham Abbey Conservation Area** and features **Waltham Abbey Scheduled Monument**. The Waltham Abbey Conservation Area Appraisal (2016) notes that the special interest of the conservation area *'derives from the surviving historic settlement pattern and the large number of historic*

buildings'. In regard to setting, the appraisal also notes that *'The land is very flat and views are consequently limited'*. Several key views are identified within the appraisal, although all of these are internal views with no relationship with Green Belt land, including that within Enfield to the south-west of the town.

- Waltham Cross is a town in the Borough of Broxbourne, to the north of Enfield. Waltham Cross was formed into a separate ecclesiastical parish (from Cheshunt) in 1855, with its church of the Holy Trinity (since renamed Christ Church) built in 1832. The more historic parts of the town, focused along High Street/Crossbrook Street (B176), are indicated by several listed buildings. However, this area is surrounded by later development which, along with the A10 road, limits any physical or visual connection with Green Belt land within Enfield.
- **Clay Hill Conservation Area** and **Forty Hill Conservation Area** together form a combined area of interesting and distinct landscape, historical and architectural character on the northern fringe of Enfield. However, their special interest lies in their character as separate, rural areas with no reference made in their respective conservation area character appraisals (2015) to any contribution to the setting and special character of Enfield town.
- **Hadley Wood Conservation Area** lies to the north-west of Enfield town and north-east of New Barnet. Its area comprises a residential suburb that was created around the new station on the Great Northern Railway. Part of the area's special interest lies in the historic significance of the development of the Borough of Enfield, providing physical evidence of the transformation of the area from rural to suburban in the late 19th and early 20th centuries. There is no reference within the conservation area character appraisal (2016) to the setting and special character of the nearby towns of Enfield or New Barnet.
- **Ponders End Conservation Area** lies along the Lee Valley to the east of Enfield town and north-east of Edmonton. It comprises the land and buildings of Wright's Mill. Its special interest lies in it being a rare survival of an 18th and 19th century flour mill. There is no reference within the conservation area character appraisal (2015) to the setting and special character of the nearby towns of Enfield or Edmonton.
- **Enfield Lock Conservation Area** lies to the east of Enfield town, along the Lee Valley. It comprises the Lea Navigation, its lock, associated buildings, and adjoining meadows. Its special interest lies in the area being of significance in Enfield for its major contribution to the industrial history and former prosperity of the area. There is no reference within the conservation area character appraisal (2015) to the setting and special character of the nearby town of Enfield. There are nine Areas of Special Character (ASC) identified within Enfield, with their

‘Protected Characteristic traits’ set out within the Area of Special Character Boundary Review (2013). The ASC are divided into three main types: Farmland Ridges and Valleys; Rural Parklands; and River Valley and Floodplain. For the majority of the identified ASC the protected characteristic traits relate predominantly to landscape quality with no specific mention of any contribution to the setting and special character of nearby historic towns.

3.224 There are three Grade II Registered Parks and Gardens within Enfield: Trent Park; Forty Hall; and Myddelton House. Whilst there are views of importance noted, these are generally internally focussed across the parks and their significance relates to the park and gardens themselves, rather than the setting and special character of historic towns.

3.225 Based on the above, the following areas of the Green Belt land within the borough are considered to make a moderate contribution to Green Belt Purpose D:

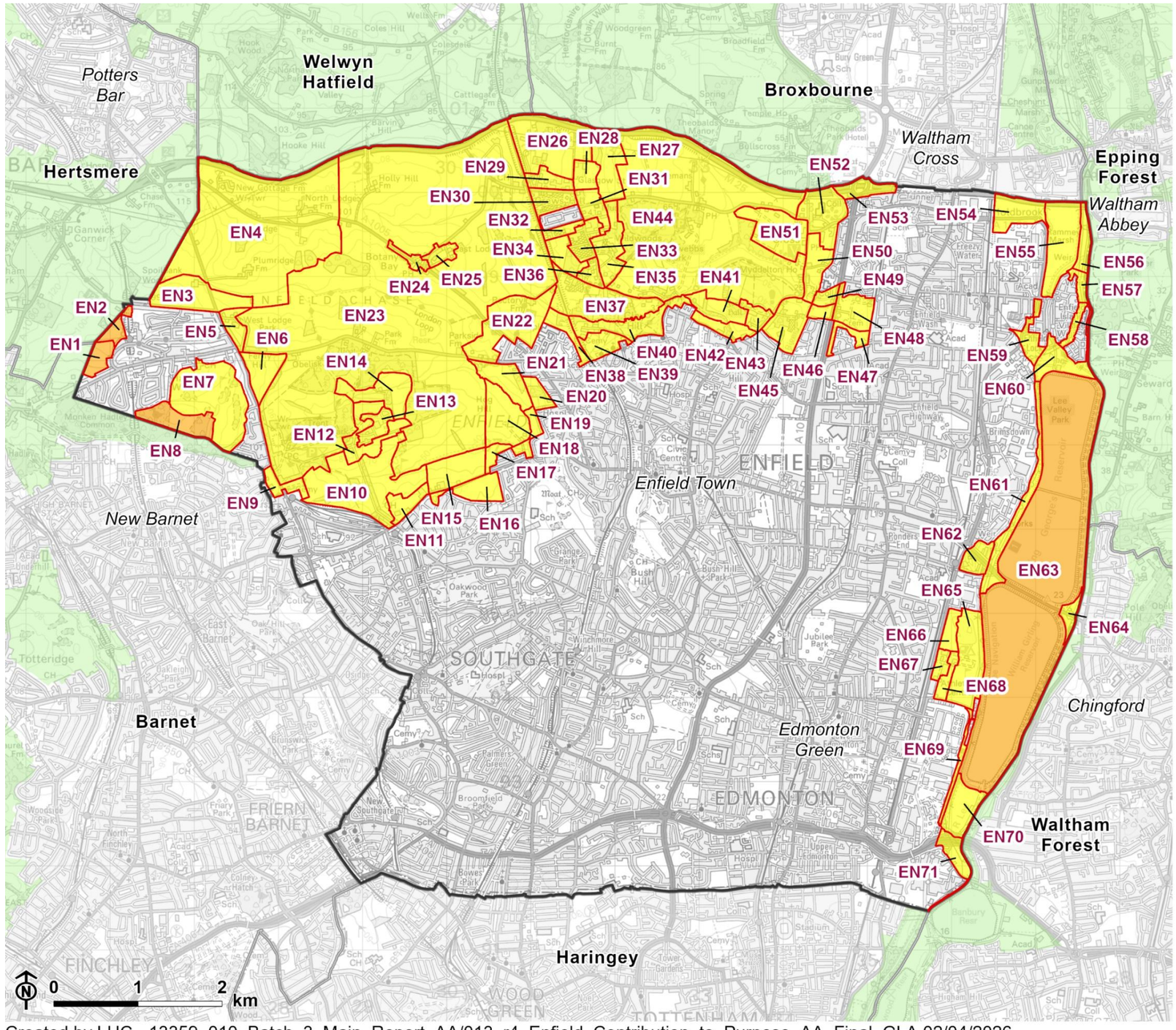
- that comprising the King George’s Reservoir and William Girling Reservoir to the east of the borough (EN63); and
- that forming the wider setting to Monken Hadley and Chipping Barnet to the west of the borough (parcels EN1, EN2 and EN8).

3.226 The remaining areas of the borough are considered to make a weak or no contribution to Purpose D. It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.227 The borough’s historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.228 Figure 3.46 illustrates the variations in contribution to Purpose D across Enfield.

Figure 3.46: Contribution to Purpose D – Preserve the setting and special character of historic towns



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Potential grey belt in the London Borough of Enfield

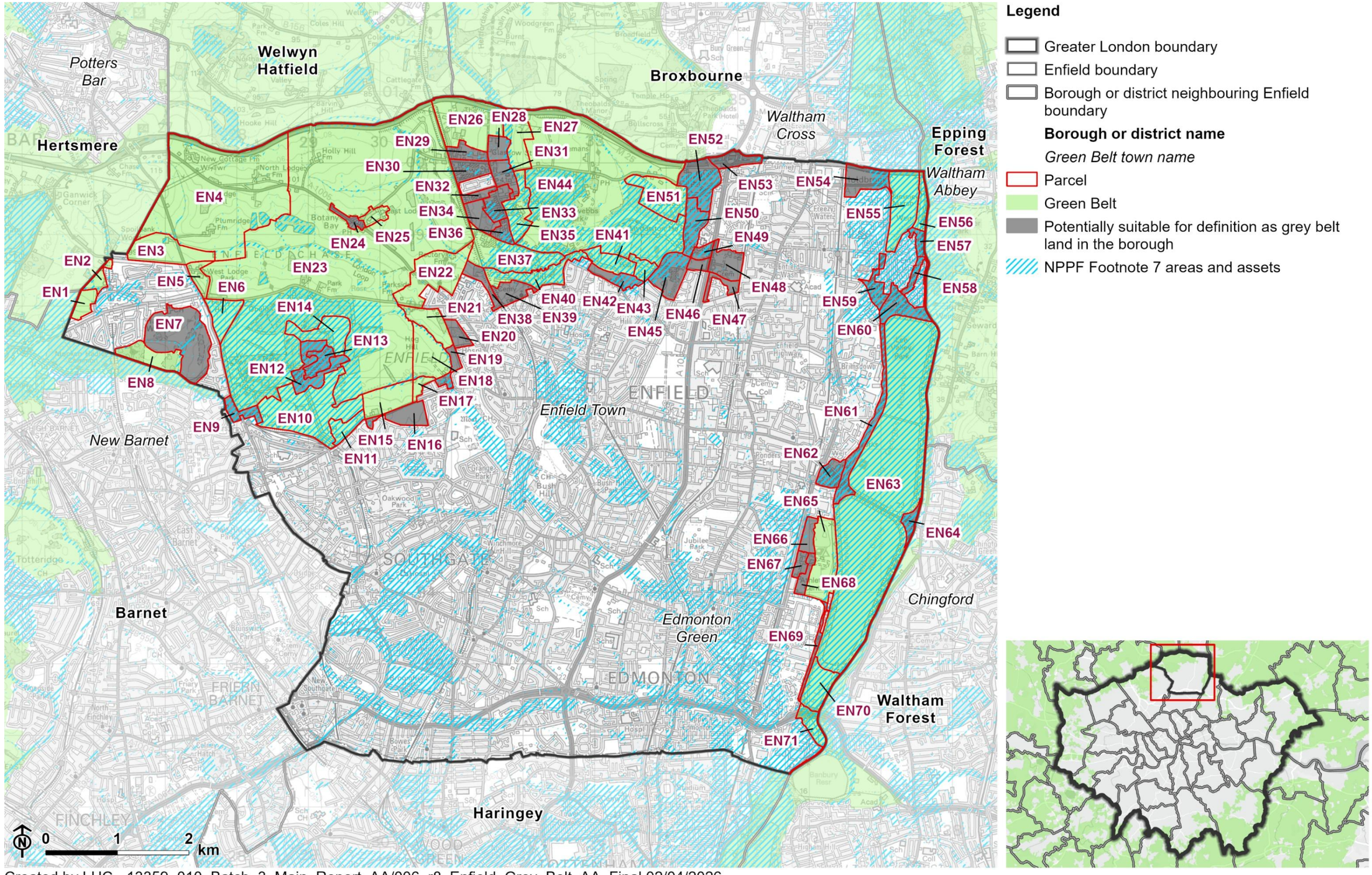
3.229 Having regard to the definition set out in the NPPF, the following areas of Enfield are defined as having potential for definition as grey belt land subject to further work by the borough:

- Hadley Wood Golf Course (EN7).
- Cockfosters Bowling and Cricket Club and Trent Park Cemetery (EN9).
- The Trent Park residential estate (EN13) and immediate grounds (EN12).
- The contained open land south of Enfield Road (EN16).
- The contained open land east and west of Camp Road and west of Chase Ridings, including Trentwood Side Allotments (EN19).
- The contained open land north of Crofton Way and south of Ridge Crest Road (EN20).
- The developed core of Botany Bay along The Ridgeway (EN24).
- The residential, commercial and industrial development and contained and urbanised open land at Crews Hill, including the land immediately north and south of Cattlegate Road (parcels EN29 and EN30), the land east of Burnt Farm Ride (EN28), the land east and west of Theobalds Park Road (parcels EN31 and EN33) and the land north and south of Ash Ride (parcels EN32 and EN34). Glasshouses cover a large part of this area but are regularly interspersed by warehouse buildings and car parks that combine to create a significant urbanising presence.
- The developed core of Clay Hill north of Strayfield Road and west of Theobalds Park Road (EN36).
- Scrubland and woodland north and east of The Kings Oak and Chase Farm Hospital, including the Chaselands Allotments (EN38).
- Lavender Hill Cemetery and the Cooks Hole Allotments (EN39).
- The Clay Hill and Gough Park Allotments (EN42).
- Developed and partially contained land east of Forty Hill Road and west of the New River, containing the residential development along the eastern side of Forty Hill Road, Worcester Primary School, Forty Hill Church of England Primary School, Jesus Church, the Clockhouse and Glebe Nursery and Goat Lane Allotments (EN45).

- The contained open land immediately east and west of the Great Cambridge Road, including the open land north (EN49) and south (EN46) of the Turkey Brook, Enfield Cemetery (EN48) and Hoe Green Park (EN47).
- Developed and open land east of Bull's Cross Road and Gilmour Close, including sports pitches, Chapel Manor Primary School and the London Christian Fellowship Church (EN50), Capel Manor College (EN52) and Junction 25 of the M25 (EN53).
- The contained open land west of the Small River Lee, south of the M25 and north and south of Mollison Avenue (EN54).
- The contained open land immediately north, east, south and west of the Enfield Island Village urban area (parcels EN57, EN58, EN59 and EN60).
- The open land retained by the high embankments of the William Girling and King George's Reservoirs (parcels EN61, EN64 and EN69).
- The developed and contained land west of the River Lee Navigation, north and south of Lea Valley Road (EN62).
- The developed and contained western side of the Green Belt land including the Lee Valley Golf Course (EN66), Lee Valley Athletics Centre and Cinema (EN67) and adjacent athletics track, scrubland and carpark (EN68).

3.230 Figure 3.47 illustrates the area potentially suitable for definition as grey belt land within Enfield.

Figure 3.47: Green Belt land potentially suitable for definition as grey belt land



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Highest and lowest contributing Green Belt land

3.231 The vast majority of the Green Belt in Enfield makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include:

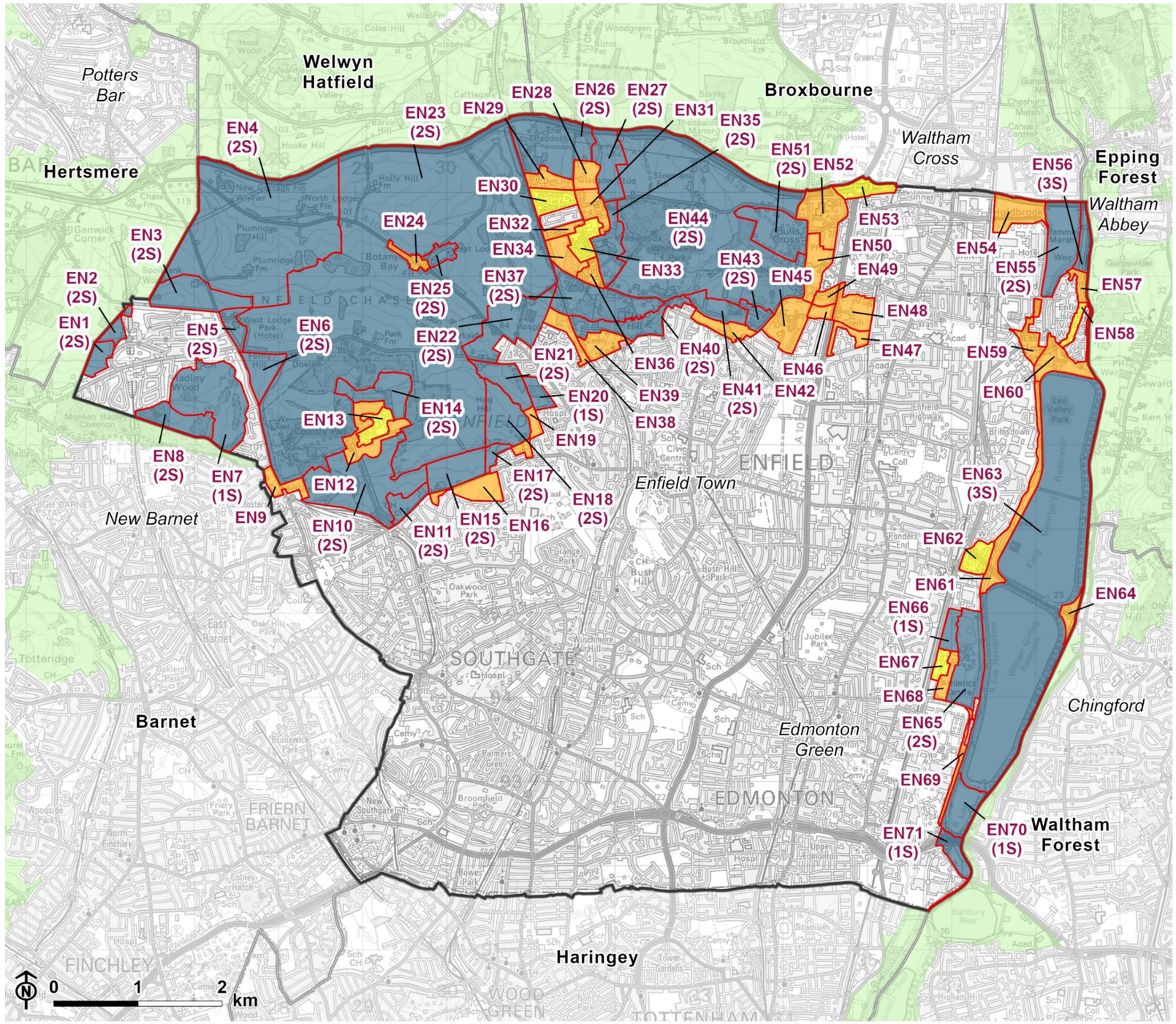
- The open Green Belt land surrounding Hadley Wood almost all of which makes a strong contribution to purposes A and C (parcels EN1 to EN6 and EN8), with the exception of the slightly more contained and less wooded EN7 which makes a strong contribution to Purpose C.
- The wooded and open rolling ridges of Trent Park, Enfield Chase and north and south of the Ridgeway which generally make a strong contribution to purposes A and C (parcels EN4, EN10, EN23 and EN37).
- The less wooded and consequently more visually open countryside adjacent to the main urban edges of Oakwood (parcels EN10 and EN15), the new Trent Park residential estate (EN14), Worlds End (parcels EN17, EN18, EN21 and EN22), Botany Bay (EN25), Crews Hill (parcels EN26, EN27, and EN35), Clay Hill (EN40) and Forty Hill (parcels EN41 and EN43), all of which make a strong contribution to purposes A and C. The one notable exception being the more contained but heavily wooded EN20, which makes a strong contribution to Purpose C.
- Whitewebbs Park, Whitewebbs Wood and the open Whitewebbs farmland and the wooded valley of the Turkey Brook west of Bull's Cross make a strong contribution to Purpose A (EN44).
- The Tottenham Hotspur Football Club Training Ground (EN51) makes a strong contribution to purposes A and C.
- Rammey Marsh (EN55) makes a strong contribution to purposes B and C.
- The thin wooded island in between the western and eastern courses of the River Lea in the far north east of the borough (EN56) make a strong contribution to purposes A, B and C.
- The William Girling and King George's Reservoirs in the east of the borough (EN63) make a strong contribution to purposes A, B and C.
- The Lee Valley Golf Course and Camping and Caravan Park generally make a strong contribution to purposes B and C (EN65), with the exception of the area defined by parcel EN66, which makes a strong contribution to Purpose C.
- The open land south of the William Girling Reservoir in between the River Lee Navigation to the west and the River Lea to the east in the far south eastern

corner of the borough (parcels EN70 and EN71), which make a strong contribution to Purpose B. In addition, parcel EN70, although currently a site for aggregate storage, it is open and undeveloped and makes a strong contribution to Purpose C.

3.232 The areas within Enfield that contribute the least to the Green Belt purposes are already largely developed (parcels EN13, EN30, EN33 and EN67) with limited openness or significantly contained and urbanised by neighbouring urban areas such that they have no notable relationship with the wider open countryside (parcels EN53 and EN58) or a combination of the two (EN62). All these parcels make no more than a weak/no contribution to the Green Belt purposes.

3.233 Figure 3.48 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.48: Highest contribution to NPPF Green Belt purposes



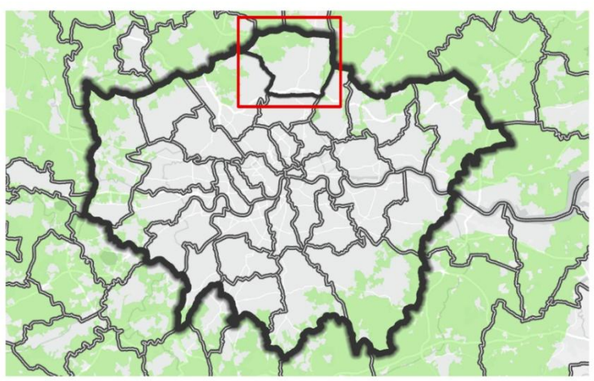
Legend

- Greater London boundary
- Enfield boundary
- Borough or district neighbouring Enfield boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.234 In light of the scale and contiguity of Green Belt land in Enfield and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development north of Gordon Hill and south of Clay Hill that would merge the urban areas of Clay Hill and Crews Hill with the large built up area of Greater London and release or development north of Enfield Island Village that would merge Waltham Abbey with the large built up area of Greater London would have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - New Barnet/Enfield (via Hadley Wood) and Potters Bar.
  - Enfield/Waltham Cross and Waltham Abbey.
  - Enfield/Edmonton Green and Chingford.
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.

Haringey

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.235 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

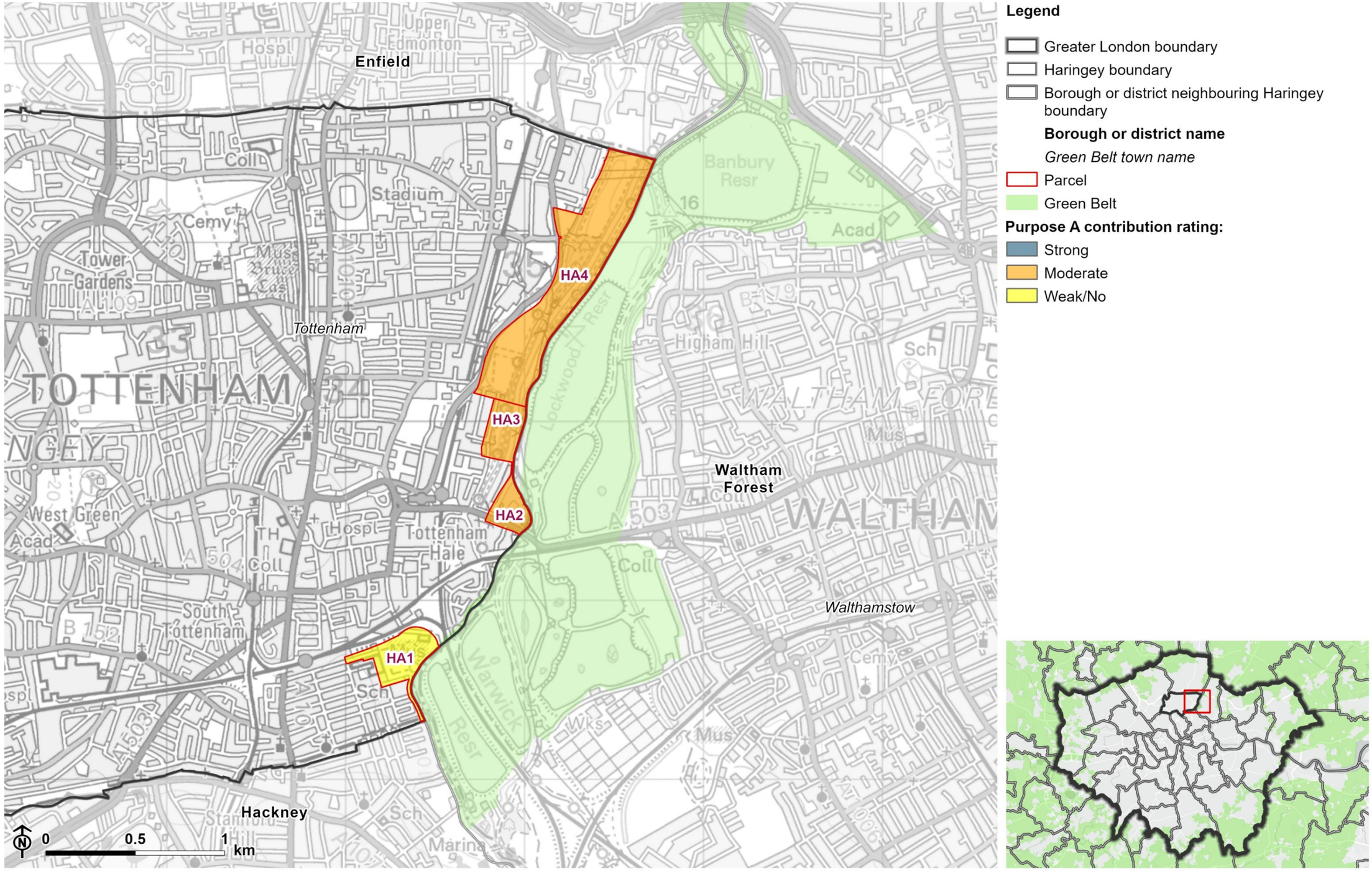
3.236 All Green Belt land in the borough is contained within the large built-up area of Greater London limiting its role in checking the sprawl of the city to some degree; however, Walthamstow Marshes (HA4), The Paddock Community Nature Park (HA2) and the East Hale Allotments (HA3) are judged to make a moderate contribution to Purpose A. These areas are generally open and have notable separation from containing urban area of Tottenham to the west; however, their wider containment within the large built-up area and the restricting role of the waterways and water

bodies of the Lea Valley directly to the east limit their overall contribution to moderate.

3.237 Markfield Park (HA1) is also retained by the same physical features but also notably more contained within the urban area of Tottenham, and contains more substantial pockets of urbanising development than the rest of the borough's Green Belt. Consequently, it makes a weak/no contribution to Purpose A.

3.238 Figure 3.49 illustrates the variations in contribution to Purpose A across Haringey.

Figure 3.49: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

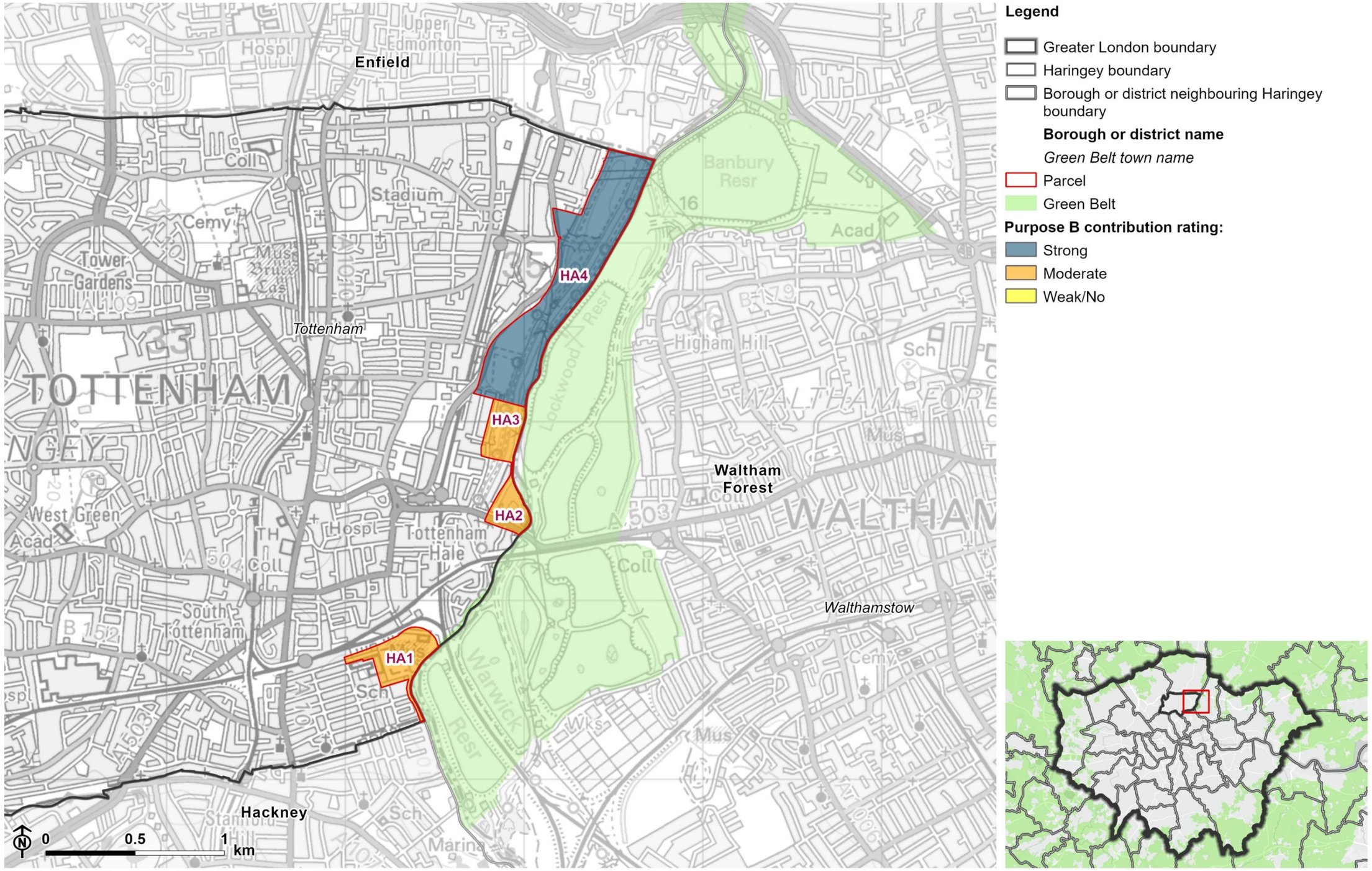
3.239 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.240 Walthamstow Marshes (HA4) makes a strong contribution to Purpose B. But for the large Lockwood Reservoir to the east, Walthamstow Marshes is the most substantial area of open scrubland and woodland in the narrow gap between the neighbouring towns of Tottenham to the west and Walthamstow to the east. Lockwood Reservoir, the River Lee and wooded Wild Marsh East maintain separation in the wider gap between towns to the east.

3.241 The more contained southern parts of the borough's Green Belt at Markfield Park (HA1), The Paddock Community Nature Park (parcel HA2) and the East Hale Allotments (HA3) represent smaller parts of the same gap and are therefore less substantial. Development in these locations would result in no more than a minor loss of visual separation between the neighbouring towns, again given the fact that the waterways and water bodies of the Lea Valley represent strong separating features. These areas are therefore judged to make a more moderate contribution to Purpose B.

3.242 Figure 3.50 illustrates the variations in contribution to Purpose B across Haringey.

Figure 3.50: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

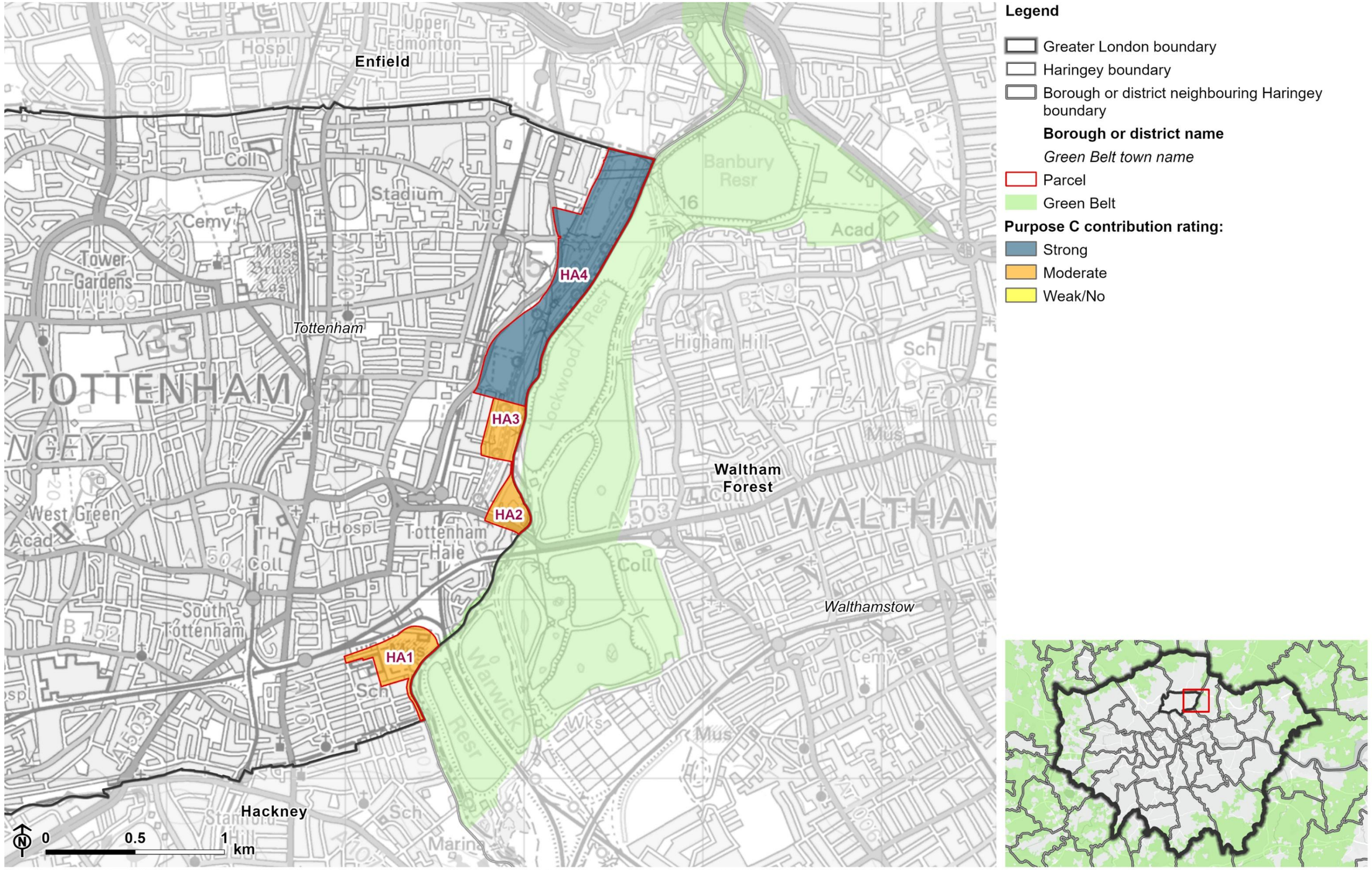
3.243 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

3.244 Walthamstow Marshes (parcel HA4) makes a strong contribution to Purpose C. This larger area of scrubland and woodland is open and has a more limited visual relationship with the surrounded urban edge. It represents the most significant of open countryside in this portion of the Lea Valley; however, Lockwood Reservoir, the River Lee and wooded Wild Marsh East play a wider restricting and screening role limiting the impact of development on the wider Lea Valley.

3.245 The more contained southern parts of the borough's Green Belt at Markfield Park (HA1), The Paddock Community Nature Park (HA2) and the East Hale Allotments (HA3) are equally retained by the waterways and water bodies of the Lea Valley, preventing wider encroachment into the Lea Valley. In addition, these areas have more of a relationship with the containing urban edge of Tottenham to the west by virtue of their land uses (including sports pitches and allotments) and the greater visibility of urbanising influences, such as Hale Wharf to the west and south of The Paddock Community Nature Park (HA2) and the East Hale Allotments (HA3) respectively, and the Markfield Beam Engine and Museum and Gladesmore Sports Centre within and in the vicinity of Markfield Park (HA1). These areas are therefore judged to make a more moderate contribution to Purpose C.

3.246 Figure 3.51 illustrates the variations in contribution to Purpose C across Haringey.

Figure 3.51: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.247 A review of relevant historic designations within and adjacent to the borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the borough contains and lies adjacent to two settlements large enough to be considered towns in Green Belt terms: Tottenham and Walthamstow.

3.248 Within these urban areas there are a number of conservation areas, the majority of which are located deep within the large built-up urban areas and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt. These areas tend to be focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points).

3.249 A linear settlement grew along Tottenham High Road, the successor to Ermine Street (the Roman road from London to Lincoln and York). The Tottenham High Road Historic Corridor today is protected by five conservation areas: **North Tottenham**; **Scotland Green**; **Bruce Grove**; **Tottenham Green** and **Seven Sisters/Page Green**. However, none of these areas have a significant physical or visual connection with the surrounding Green Belt land within the borough to the east (or within the adjacent London Borough of Waltham Forest). Views are noted within the various conservation area appraisals as being largely contained within the linear form of the high street, with limited views in and out.

3.250 The early parish of Walthamstow was predominantly rural, comprising farmland, forest and marsh interspersed with occasional large houses. However, its character changed dramatically between 1850 and 1900 with the continued expansion of London and the arrival of the railways. The Greater London Historic Landscape Characterisation (GLHLC, 2024) identifies an area of ‘historic urban core’ (intermediate type within the ‘urban settlement’ broad type) within Walthamstow. This area is also covered by **Walthamstow Village Conservation Area**, which comprises the surviving village nucleus of the town centred on the ancient parish church of St Mary’s. The conservation area, whilst situated near the summit of a low hill, is now entirely surrounded by the later development of Walthamstow. This means that that long views into and out of the area are largely obscured. Several other conservation areas lie within the surrounding townscape (including **Orford Road**, **Walthamstow St James**, **Leuca Road**, **Lloyd Park** and **Bakers Arms**) although they also have limited physical and visual connection with surrounding Green Belt land due to surrounding later development.

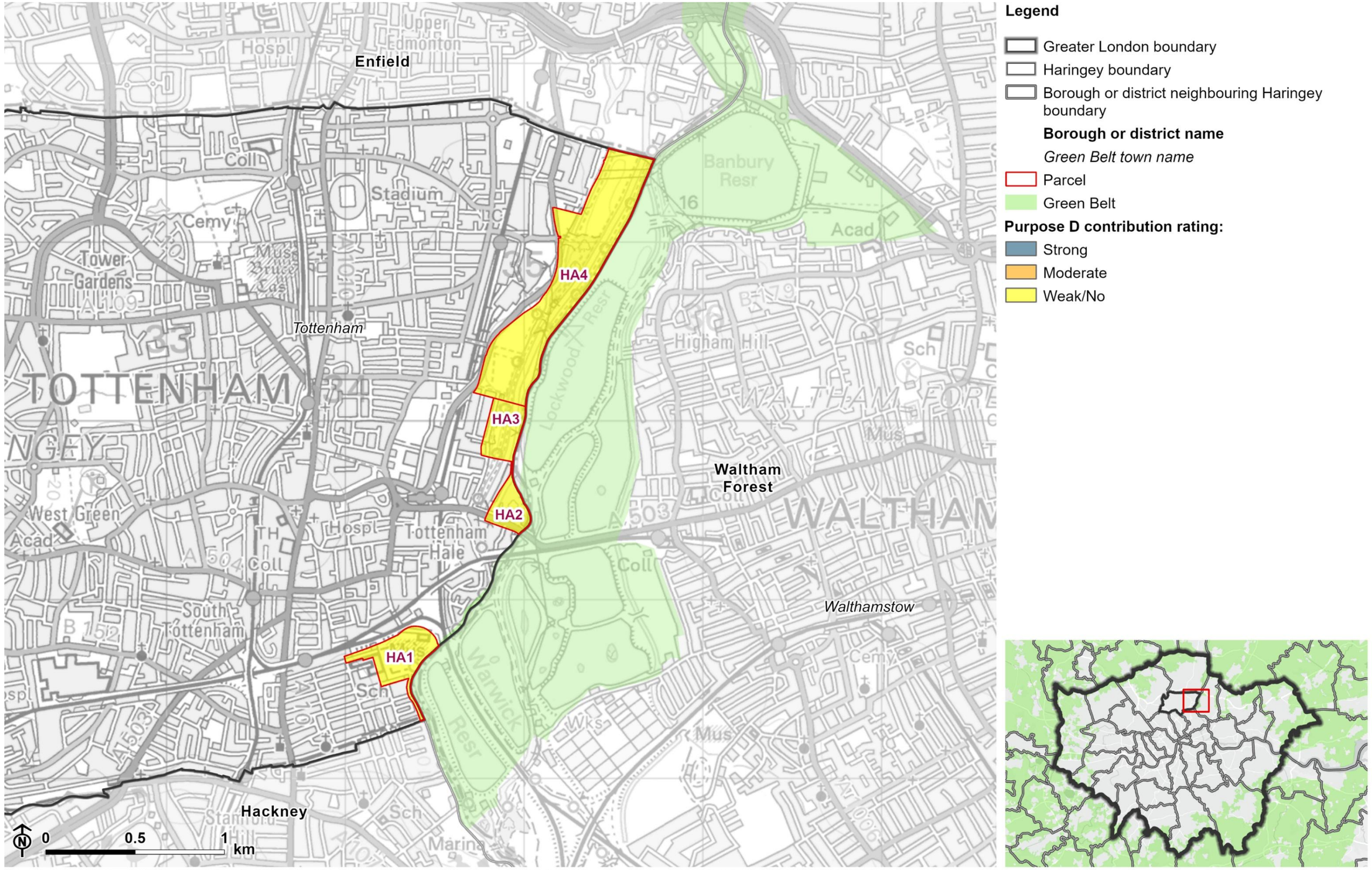
3.251 Based on the above, none of the Green Belt land within Haringey is considered to make a notable contribution to Green Belt Purpose D.

3.252 It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.253 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.254 Figure 3.52 illustrates the variations in contribution to Purpose D across Haringey.

Figure 3.52: Contribution to Purpose D – Preserve the setting and special character of historic towns



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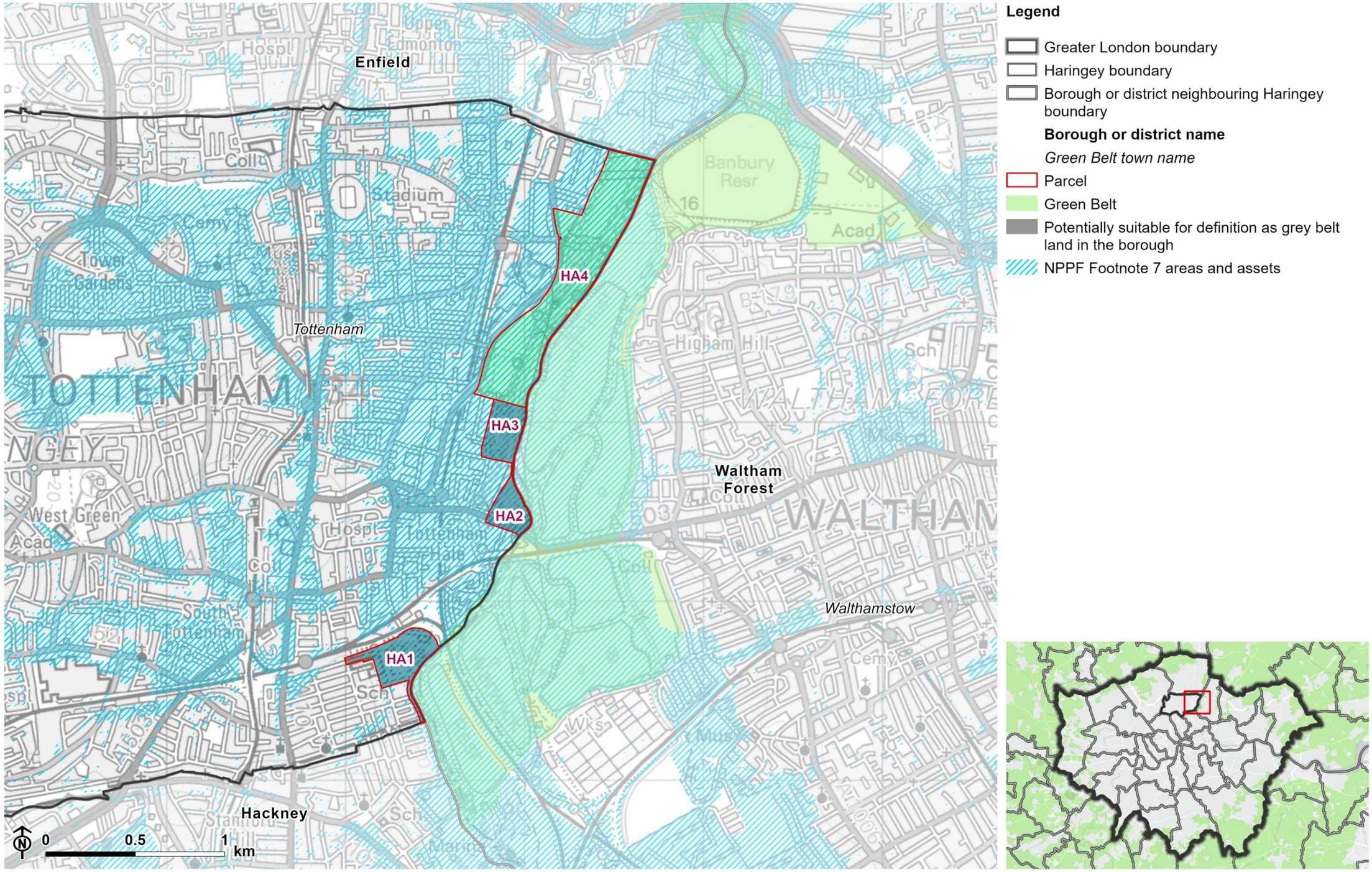
Potential grey belt in the London Borough of Haringey

3.255 Having regard to the definition set out in the NPPF, the following areas of Haringey are defined as having potential for definition as grey belt land subject to further work by the borough:

- Markfield Park (HA1).
- the Paddock Community Nature Park (HA2).
- the East Hale Allotments (HA3).

3.256 Figure 3.53 illustrates the area potentially suitable for definition as grey belt land within Haringey.

Figure 3.53: Green Belt land potentially suitable for definition as grey belt land



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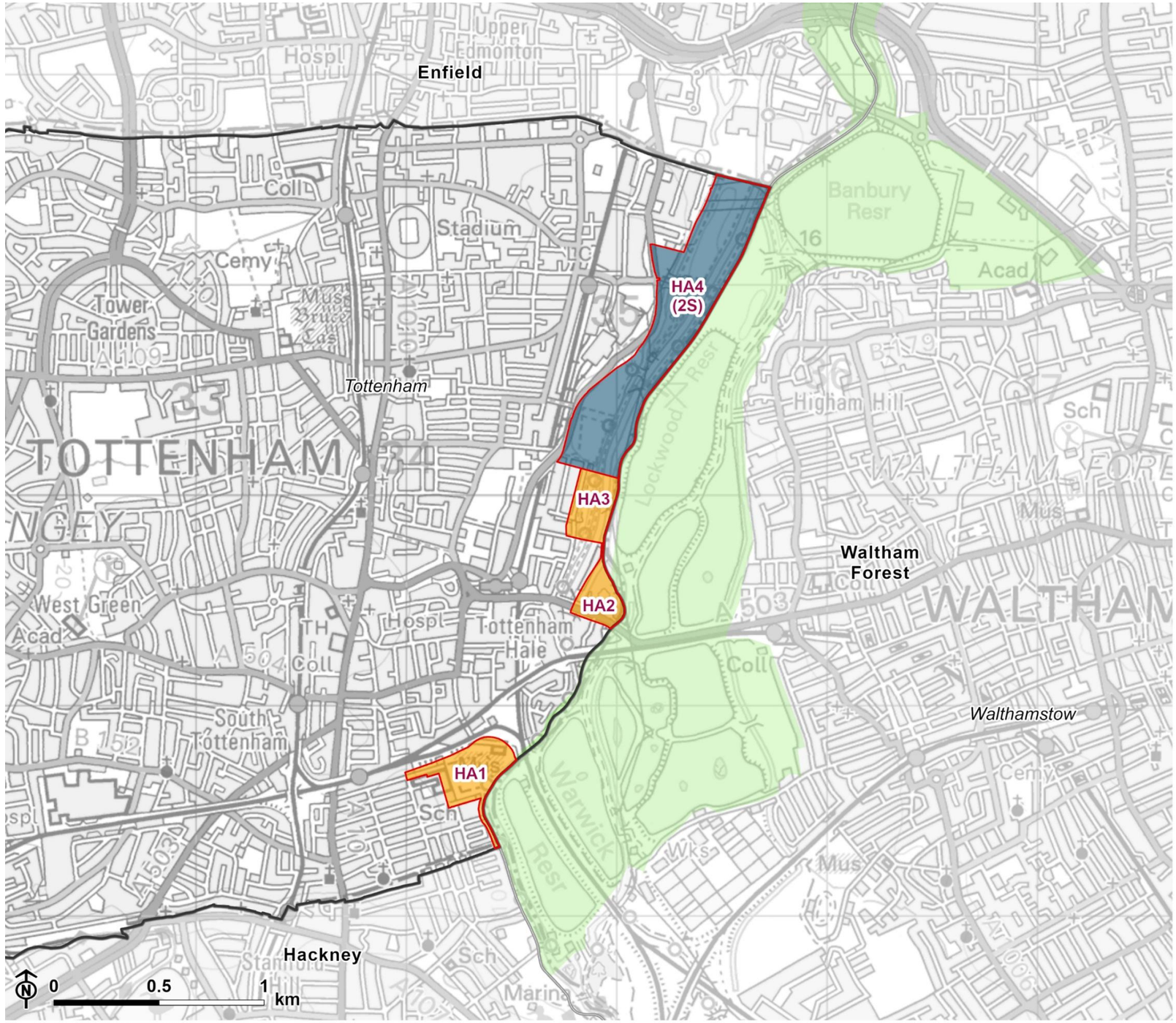
Highest and lowest contributing Green Belt land

3.257 Haringey contains a relatively small area of Green Belt land but its location and openness are such that it generally makes a strong contribution to the Green Belt purposes. Walthamstow Marshes (HA4) makes a strong contribution to purposes B and C and a moderate contribution to the Green Belt Purpose A. The more contained southern parts of the borough's Green Belt at Markfield Park (HA1), The Paddock Community Nature Park (HA2) and the East Hale Allotments (HA3) make a moderate contribution to the Green Belt purposes, including purposes B and C. All Green Belt land in the borough is considered to make a weak/no contribution to Purpose D.

3.258 Figure 3.54 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.54: Highest contribution to NPPF Green Belt purposes



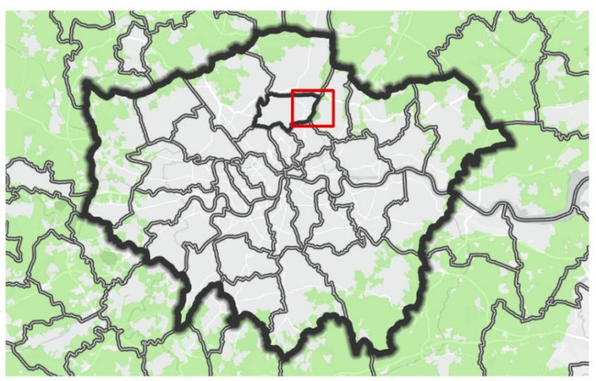
Legend

- Greater London boundary
- Haringey boundary
- Borough or district neighbouring Haringey boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.259 In light of the scale and contiguity of Green Belt land in Haringey and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development that would result in the physical or perceived merging of Tottenham to the west and Walthamstow to the east would have a fundamental impact on Purpose B. It is noted that this would require further release and development within the neighbouring London Borough of Waltham Forest to occur in advance or in combination, most notably at Wild Marsh East. Wild Marsh East represents the only area of Green Belt land in the wider gap between towns that is not covered by the Lea Valley's waterbodies and waterways.
- Release or development of the vast majority of all the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.

Harrow

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.260 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

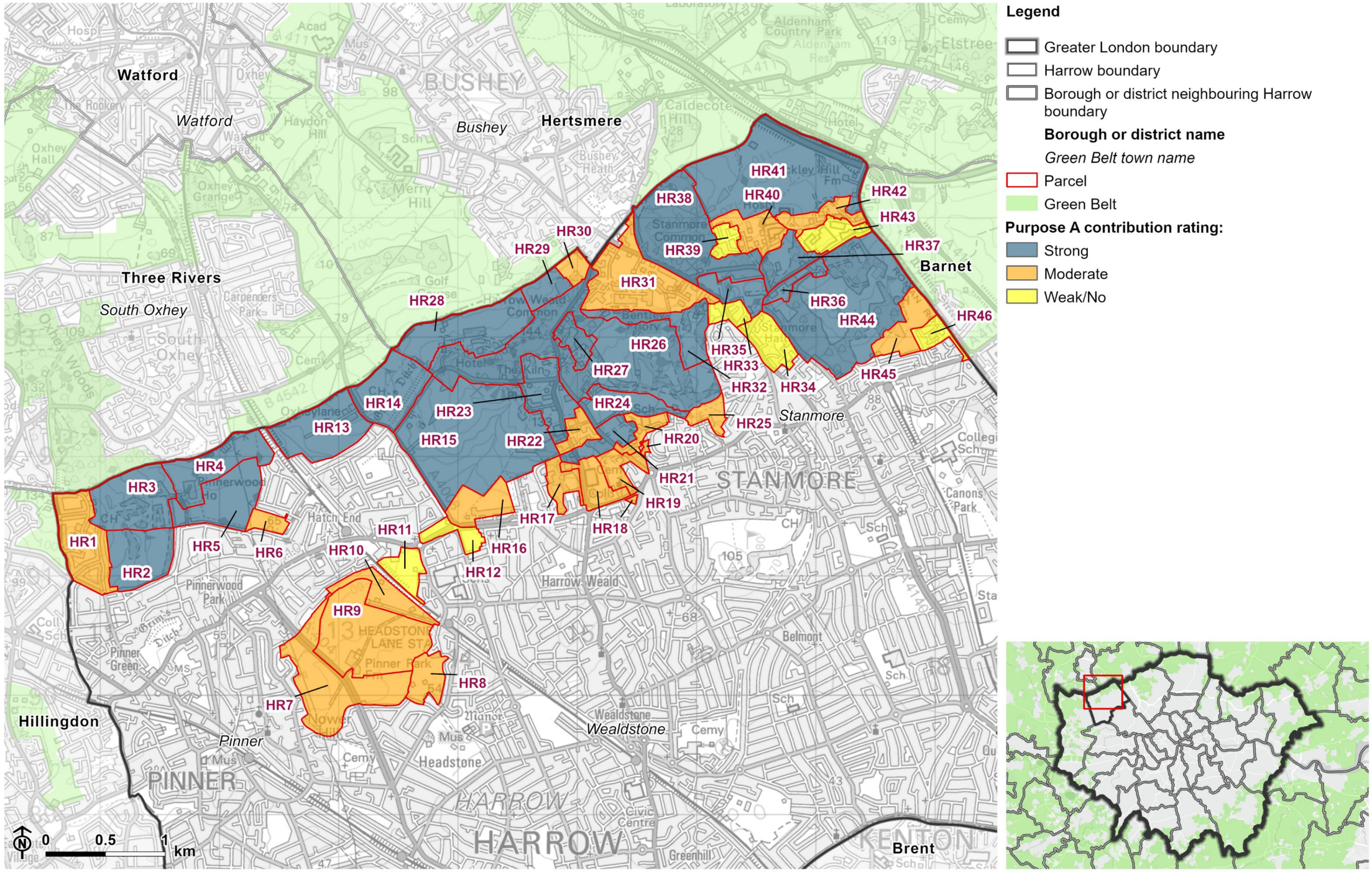
3.261 The majority of Green Belt land within Harrow makes a strong contribution to Purpose A due to it being sandwiched between the large built-up areas of Greater London, South Oxhey, Bushey and Borehamwood and being largely comprised of open, steep wooded slopes with a strong sense of separation from neighbouring urban areas. The parcels which make a strong contribution are particularly open and separate from urban areas and/or sit in locations that prevent Greater London from merging with neighbouring urban areas (parcels HR3 and HR4, HR13 and HR14, HR28, HR26, HR35, HR37, HR38, HR41, HR44). Several more parcels still make a strong contribution but contain some limited and isolated urbanising influences or have notable views of the surrounding urban edges (parcels HR2, HR5, HR15, HR21, HR23, HR24, HR27, HR29, HR32 and HR36).

3.262 Where the land is more contained or developed such that it has a lower sense of separation from large built-up areas or just less openness, but is still sufficiently distinct from large built up areas that further development would represent sprawl, make a more moderate contribution to Purpose A (parcels HR1, HR6, HR7-HR10, HR16, HR17-HR20, HR22, HR25, HR30 and HR31, HR40, HR42 and HR45). Parcels HR1, HR31 and HR40 contain substantial areas of development with some open areas but the sensitivity of their locations in the narrow gaps between Greater London and South Oxhey, Bushey and Borehamwood (via Elstree) elevate their contributions to moderate.

3.263 Green Belt land that contains significant areas of development with no notable openness or no notable distinction from adjacent large built up areas (parcels HR33, HR34, HR39, HR43 and HR46) or are wholly isolated within small pockets of open land within the large built-up area (parcels HR11 and HR12) make a weak/no contribution to Purpose A.

3.264 Figure 3.55 illustrates the variations in contribution to Purpose A across Harrow.

Figure 3.55: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.265 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.266 The areas that make a strong contribution are the least urbanised, open and often well treed parcels in the narrowest and therefore most fragile gaps between neighbouring towns. Parcels that make a strong contribution to Purpose B include:

- Parcels HR2-HR5, HR13 and HR14 make strong contributions to Purpose B due to the important role they play in maintaining separation between South Oxhey and Pinner and Wealdstone via Pinner Green, Pinnerwood Park and Hatch End in the fragile gap between the towns. Parcels HR2 and HR5 are slightly more contained.
- Parcels HR23, HR26, HR27 and HR32 make a strong contribution to Purpose B due to the fact that is open and steeply wooded slopes maintain separation in the fragile gap between Bushey and Stanmore and Wealdstone (via Harrow Weald), noting that significant ribbon development along connecting roads between towns has already occurred (HR31) increasing the fragility of the gap.
- Parcels HR35-HR38, HR41 and HR44 make a strong contribution to Purpose B due to being located in a fragile gap between Bushey, Stanmore/Edgware and Borehamwood, which is significantly narrowed by the intervening development along the connecting roads and at Elstree. The significance of the treelined M1 as a separating feature is diminished by the scale of development directly to the north and south of it in the gap. The mature woodland and rolling fields in these parcels represent the most substantial separating features and inhibit the expansion and consolidation of the existing ribbon development in the gap.

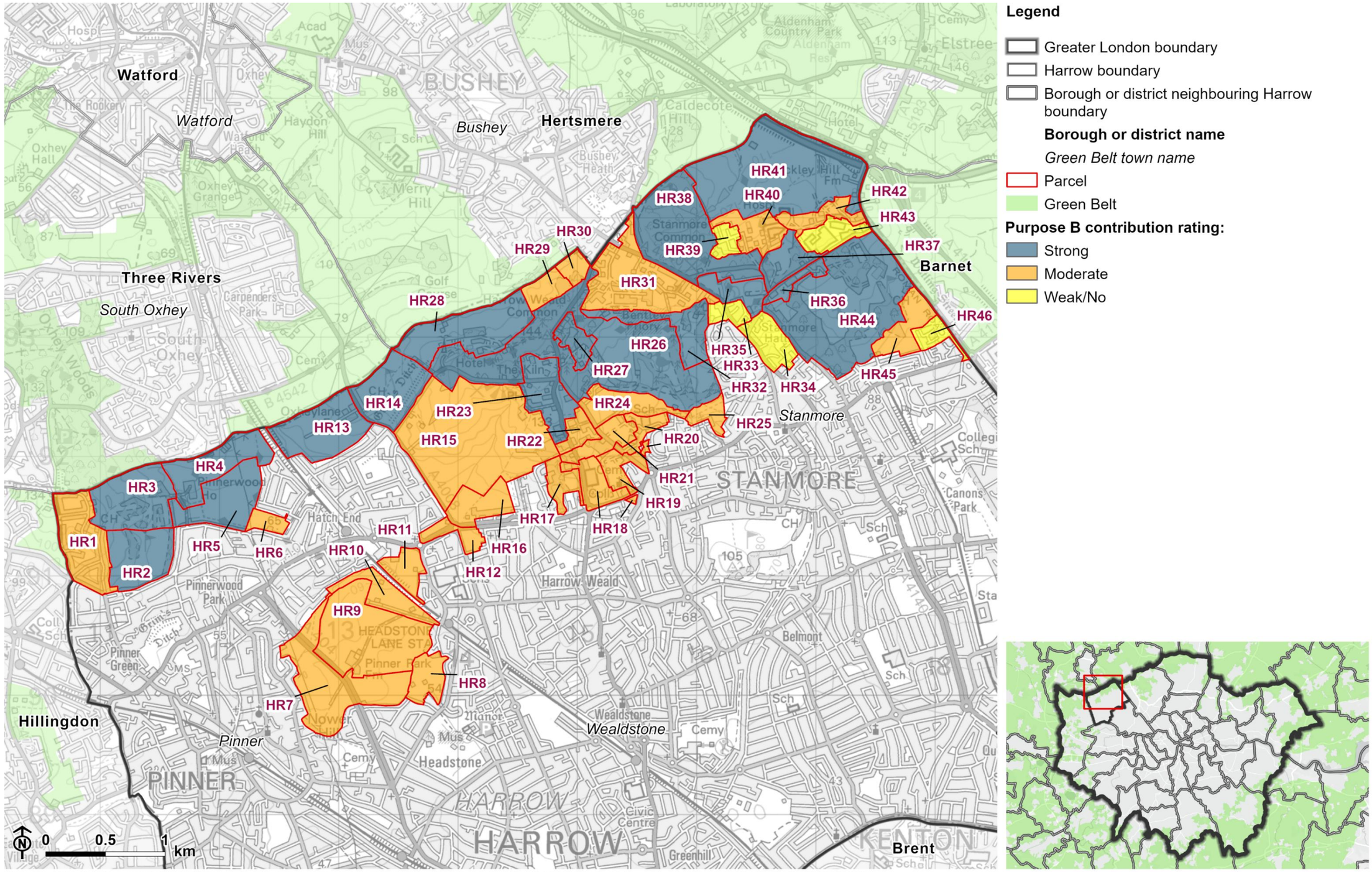
3.267 Green Belt land that is particularly developed (parcels HR33, HR34, HR39, HR43 and HR46) make a weak/no contribution to Purpose B.

3.268 The remaining areas make a moderate contribution to this purpose because they are more contained or urbanised by urban areas and as such form less substantial parts of fragile and moderate gaps between towns. These areas are still have some openness or distinction from urban areas that they still play some separating role between neighbouring towns (parcels HR1, HR6, HR7-HR12, HR15-HR22, HR24 and HR25, HR29-HR31, HR40, HR42 and HR45). Parcels HR1, HR31 and HR40 contain substantial areas of development but there are some open areas and the sensitivity of their locations in the narrow gaps between Greater London and

South Oxhey, Bushey and Borehamwood (via Elstree) elevate their contributions to moderate.

3.269 Figure 3.56 illustrates the variations in contribution to Purpose B across Harrow.

Figure 3.56: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.270 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

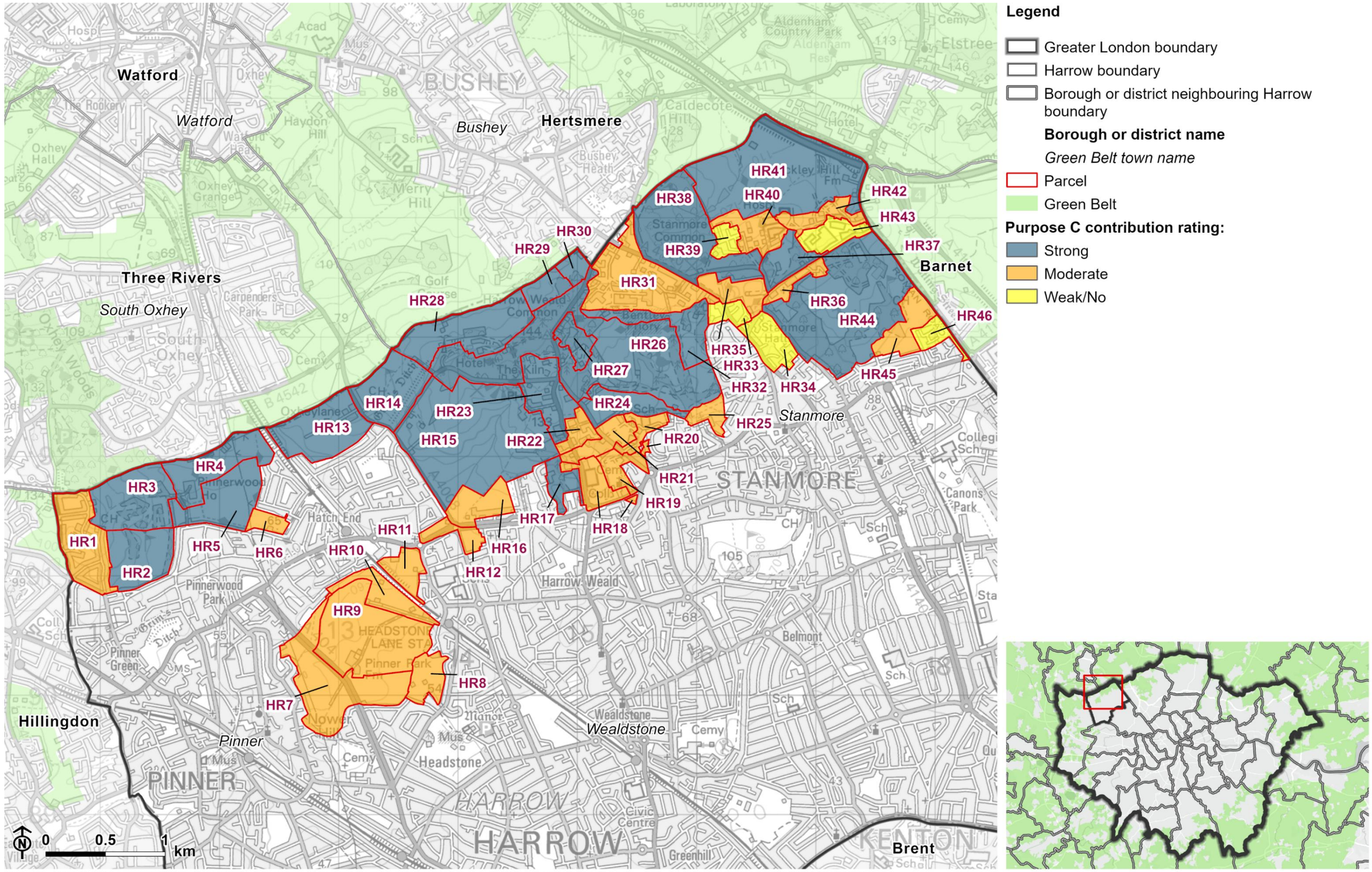
3.271 Large parts of the boroughs Green Belt land are comprised of open countryside that has a strong sense of separation from urban areas and is not subject to any substantial urbanising influence. Parcels HR3 and HR4 make a strong contribution to Purpose C for the role they play in maintaining a wider connection between areas of open countryside in between Greater London and South Oxhey, noting that significant development within these areas would risk severing open countryside to the south, west and north from the wider countryside to the east. Parcels HR26, HR28 and HR38 make a strong contribution to Purpose C by virtue of their wide open views of the wider open countryside, general lack of urbanising influences as a result of dense woodland cover. Several other parcels (parcels HR2, HR5, HR13, HR14, HR15, HR17, HR23, HR24, HR27, HR29, HR30, HR32, HR37, HR41 and HR44) make a strong contribution to Purpose C. In these locations the open countryside dominates and dilute urbanising influence and/or woodlands serve to screen and check the urbanising influences in the countryside.

3.272 Green Belt land that contains significant areas of development with no notable openness or no notable distinction from adjacent large built up areas (parcels HR33, HR34, HR39, HR43 and HR46) make a weak/no contribution to Purpose C.

3.273 The remaining areas (parcels HR1, HR6, HR7-H12, HR16, HR18-HR22, HR25, HR31, HR35, HR36, HR40, HR42 and HR45) make a moderate contribution to this purpose for a range of reasons, such as where land is developed with some openness and relationship with the wider countryside and/or urbanised but still retains a relationship with the wider countryside; or where Green Belt land is open but has land uses associated with the urban area rather than the open countryside, such as sports playing fields; and/or where land is open but has a limited relationship with the wider countryside such that development would not have a wider encroaching influence.

3.274 Figure 3.57 illustrates the variations in contribution to Purpose C across Harrow.

Figure 3.57: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.275 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to eight settlements large enough to be considered towns in Green Belt terms – Bushey, Borehamwood, Northwood, Pinner, South Oxhey, Stanmore, Watford, and Wealdstone. In addition, whilst located some distance from Green Belt land and not relevant to Purpose B, the town of Harrow to the south and Hendon (within the neighbouring London Borough of Barnet) to the south-east are relevant to Purpose D.

3.276 Watford is located in Watford District to the north of Harrow, beyond Bushey Heath and South Oxhey, at such a distance that Green Belt land within Harrow makes little to no contribution to its setting and special character.

3.277 Borehamwood, South Oxhey and Wealdstone are not considered to be historic towns as they lack a ‘historic urban core’ (intermediate type within the ‘urban settlement’ broad type) identified within the Greater London Historic Landscape Characterisation (GLHLC) (2021) and are not protected by notable historic designations, such as conservation areas. Historic mapping shows the original settlement of Borehamwood to be a small hamlet/village which grew considerably following the Second World War, with the construction of large areas of council housing for displaced Londoners. South Oxhey comprises a large housing estate built on land that was formerly part of the Oxhey Hall Estate after the Second World War to help alleviate housing pressure in London. Wealdstone was a rural area that later developed around Harrow Station (now Harrow & Wealdstone station) which was built in 1837. The majority of development in the town comprises Victorian and Edwardian terraces interspersed with some newer flatted developments in High Street and George Gange Way. The Kodak Harrow factory was located in Wealdstone (until its closure in 2016) which, along with other nearby factories, turned Wealdstone into Harrow's industrial centre.

3.278 The following towns have conservations areas which are located in relatively close proximity to Green Belt land in the borough:

- **Bushey High Street Conservation Area** covers the remnant historic core of the town within Hertsmere District. The Bushey High Street Conservation Area Appraisal (2008) notes that the area ‘lies at the centre of the town which developed from a small early settlement that stood around a village green next to the Church of St James and extended eastwards along the High Street’.

However, the historic core of the town is located some distance from Green Belt land within Harrow such that it makes little to no contribution to the town's setting and special character. The key views and vistas identified within the conservation area appraisal are predominantly internal, focused on key focal points. In the south of the town lies the High Road Bushey Heath Conservation Area, covering Windmill Lane, High Road and Hartsbourne Park. The High Road Bushey Heath Conservation Area Appraisal (2013) notes that the area's special interest 'is based around the still identifiable traces of early 19th Century settlement and development following the enclosure of Bushey Heath in 1808'. One of the key views and vistas noted within the conservation area appraisal is south along High Road towards the boundary with the London Borough of Harrow, where 'the sloping view down the hill out of the Area, lined with trees, illustrates its proximity with the wooded area of Stanmore Common'.

- Northwood, located within the neighbouring London Borough of Hillingdon, began as a hamlet along the north side of the Rickmansworth-Pinner road. Not much of this historic core survives, having expanded following the opening of Northwood Station in 1887. However, the town centre features three conservation areas which protect areas of this later development. This includes **Northwood Town Centre**, **Green Lane Conservation Area**, which is characterised by its late Victorian and Edwardian architecture; **The Glen, Northwood Conservation Area**, comprising 1950's planned development; and **Northwood, Frithwood Conservation Area**, which is primarily characterised by large individually designed detached houses in the Arts and Crafts style. Furthermore, there is no documented reference to surrounding open Green Belt land contributing to the setting and special character of these areas, including that in Harrow to the east.
- The medieval settlement of Pinner comprised several scattered hamlets and farmsteads the chief amongst which was focused along Pinner High Street. The GLHLC (2021) identifies an area of 'historic urban core' (intermediate type within the 'urban settlement' broad type) at Pinner High Street, an area also protected by **Pinner High Street Conservation Area**. Surrounding the High Street are other remnants of the historic parts of Pinner: to the immediate south an area now protected by **Tookes Green Conservation Area**; to the east an area protected by **East End Farm Conservation Area**; and to the north an area protected by **Waxwell Lane Conservation Area**. The identified key views and vistas within the respective conservation area appraisals are generally internal, being focused along roads and across open and green spaces towards landmark buildings. However, the Harrow Core Strategy 2012 and policies map identify an Area of Special Character at Pinner Hill to the north of Pinner. The core strategy (paragraph 9.3) states that 'together with the countryside at Pinner

Park Farm, this extensive open land provides a wider setting for the historic village of Pinner…'. Other conservation areas within Pinner relate to later development, such as **Moss Lane**, **Waxwell Close** and **Pinner Road**. There are also two Local Areas of Special Character identified within the Harrow Local Plan located to the west of the High Street – on West End Avenue and Meadow Road, and Eastcote Road. However, the importance of these areas relates to the presence of Edwardian and pre-World War I houses which have a locally cohesive and well-preserved townscape and architectural quality.

- In the early 20th century, as the population of London grew, Stanmore became increasingly urbanised and the former small rural village was rapidly becoming a suburb of London. This was accelerated following the opening of the Metropolitan Railway in 1932 and the construction of a station at Stanmore (now a London Underground Station). The GLHLC (2021) identifies three areas of 'historic urban core' (intermediate type within the 'urban settlement' broad type) within Stanmore, in an area also protected by **Stanmore Hill Conservation Area** and **Old Church Lane Conservation Area**. Whilst the former adjoins Green Belt land on its northern boundary, there are no documented references in the Stanmore Hill Conservation Areas Appraisal (2013) to this contributing to the setting and special character of the area. The identified key views and vistas within the area are generally focused along roads, with the only documented distant views being to the south due to the sloping land. Similarly, the identified key views and vistas within the Old Church Lane Conservation Area Appraisal (2013) are internally focused along roads and across open spaces with no documented visual links with surrounding Green Belt land to the north. To the north of Stanmore Hill lies **Little Common Conservation Area** which comprises an area by the Common, featuring cottages developed in a piecemeal fashion in the 17th century and large listed houses set within extensive grounds. The Little Common Conservation Area Appraisal (2013) notes that the area 'is characterised by lower density development and a more rural and peaceful air' and that 'trees and open spaces are an overriding feature as they surround and interact with the attractive groups of buildings, imparting much of the special landscape and qualities of the area' (largely provided by Stanmore Common). Much of this area is also identified within the Harrow Core Strategy 2012 and policies map as part of the Harrow Weald Ridge Area of Special Character which the core strategy notes as providing a green backdrop of higher ground when viewed from the lower-lying suburban areas to the south.
- The historic village core of Harrow is protected by **Harrow on the Hill Village Conservation Area**. The Harrow on the Hill Conservation Area Appraisal (2008) notes that the area comprises a large wooded mound rising over 70m above the surrounding plain, containing an ancient church and spire (Grade I

listed Parish Church of St Mary). The hill is a conspicuous part of Harrow that can be enjoyed from many points around, including from higher Green Belt land to the north. The Harrow Weald Ridge Area of Special Character, identified within the Harrow Core Strategy 2012 and policies map, provides a green backdrop of higher ground when viewed from the lower-lying suburban areas to the south including Harrow. The Harrow Local Plan also identifies two Protected Views towards Harrow on the Hill and St Mary's Church from this area of higher ground: from the proposed Country Park at Wood Farm (VP 22) and from Old Redding (VP 08). The Barnet Local Plan 2021-2036 also identifies a 'Locally Important View' PV01 from Mill Field (in Mill Hill) towards Harrow-on-the-Hill to the south-west.

- The high ground at the centre of the parish of Hendon was originally occupied by three hamlets: The Burroughs, Church End and Brent Street. The GLHLC (2021) identifies two areas of 'historic urban core' (intermediate type within the 'urban settlement' broad type) within Hendon, areas also covered by **Hendon Church End Conservation Area** and **Hendon The Burroughs Conservation Area**. The name 'Hendon' is thought to date from Anglo-Saxon times and is linked to the topography of the area, and the presence of a 'high hill'. The topography of Hendon Church End is relatively flat, with the exception of the northern end, where Greyhound Hill slopes dramatically down towards Watford Way. The Hendon Church End Conservation Area Character Appraisal (2012) notes that 'long range glimpsed views out over the north-west of the borough … contribute to the rural atmosphere of the area'. Views from the edge of Sunny Hill Park and St Mary's Churchyard look north-west towards distant higher ground within Harrow. In contrast the Hendon The Burroughs Conservation Area Character Appraisal (2012) notes that the topography of that area is relatively flat with the identified key views and vistas being internal along roads.

3.279 The Grade II **Bentley Priory Registered Park and Garden** comprises a 16th century estate enlarged and improved in the late 18th century. The listing for the park notes that it lies around 1km to the north-west of Stanmore but there is no reference to the park contributing to the setting and special character of the town.

3.280 Based on the above, the following areas of the Green Belt land within Harrow are considered to make a contribution to Green Belt Purpose D:

- Higher ground around Pinner Hill is identified as an 'Area of Special Character' which provides an open setting to the north of Pinner makes a strong contribution to its setting and special character (parcels HR2 and HR3), whilst land on Pinner Hill that is developed with some limited openness makes a moderate contribution (parcel HR1).

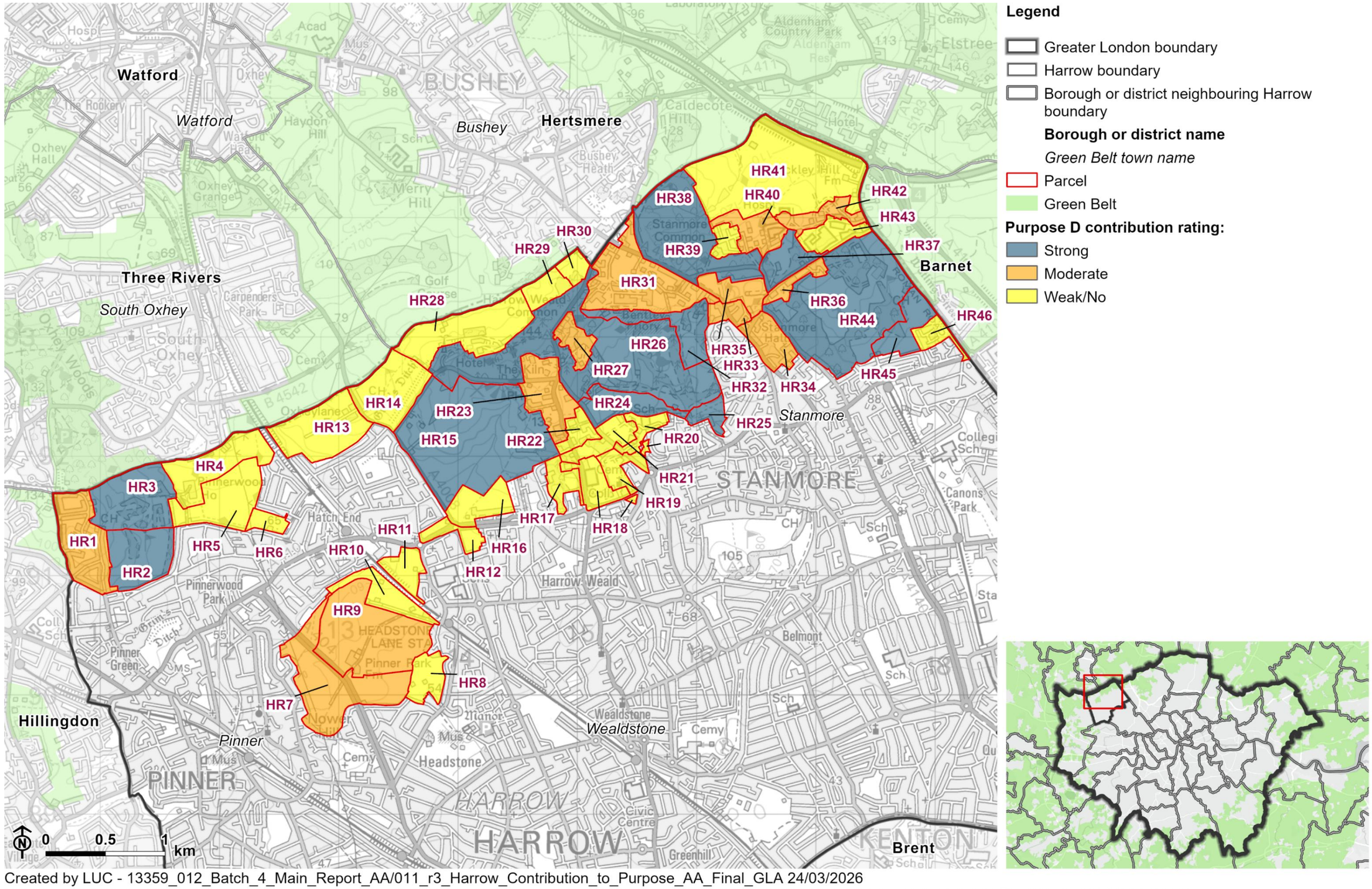
- Open countryside at Pinner Park Farm provides a wider setting to the east of the town of Pinner makes a moderate contribution to its setting and special character (parcels HR7 and HR9).
- Higher ground to the north of the Borough forms part of an 'Area of Special Character' that provides a distinctive open setting to the north of Stanmore and a green backdrop of higher ground when viewed from the lower-lying suburban areas to the south (including from Harrow) and south-east (from Hendon) makes a strong contribution to its setting and special character (parcels HR15, HR24, HR25, HR26, HR32, HR37, HR38, HR44 and HR45); whilst areas that are partially developed or comprise open suburban land uses such as sports pitches make a moderate contribution (parcels HR23, HR27, HR31, HR33, HR34, HR35, HR36, HR40 and HR42).
- Tree cover that provides a wider visual setting to the south of Bushey, reflecting proximity with the wooded area of Stanmore Common, makes a moderate contribution to its setting and special character (HR31).

3.281 Other areas of the borough are considered to make a weak or no contribution to Purpose D. It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristic.

3.282 The borough’s historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.283 Figure 3.58 illustrates the variations in contribution to Purpose D across Harrow.

Figure 3.58: Contribution to Purpose D – Preserve the setting and special character of historic towns



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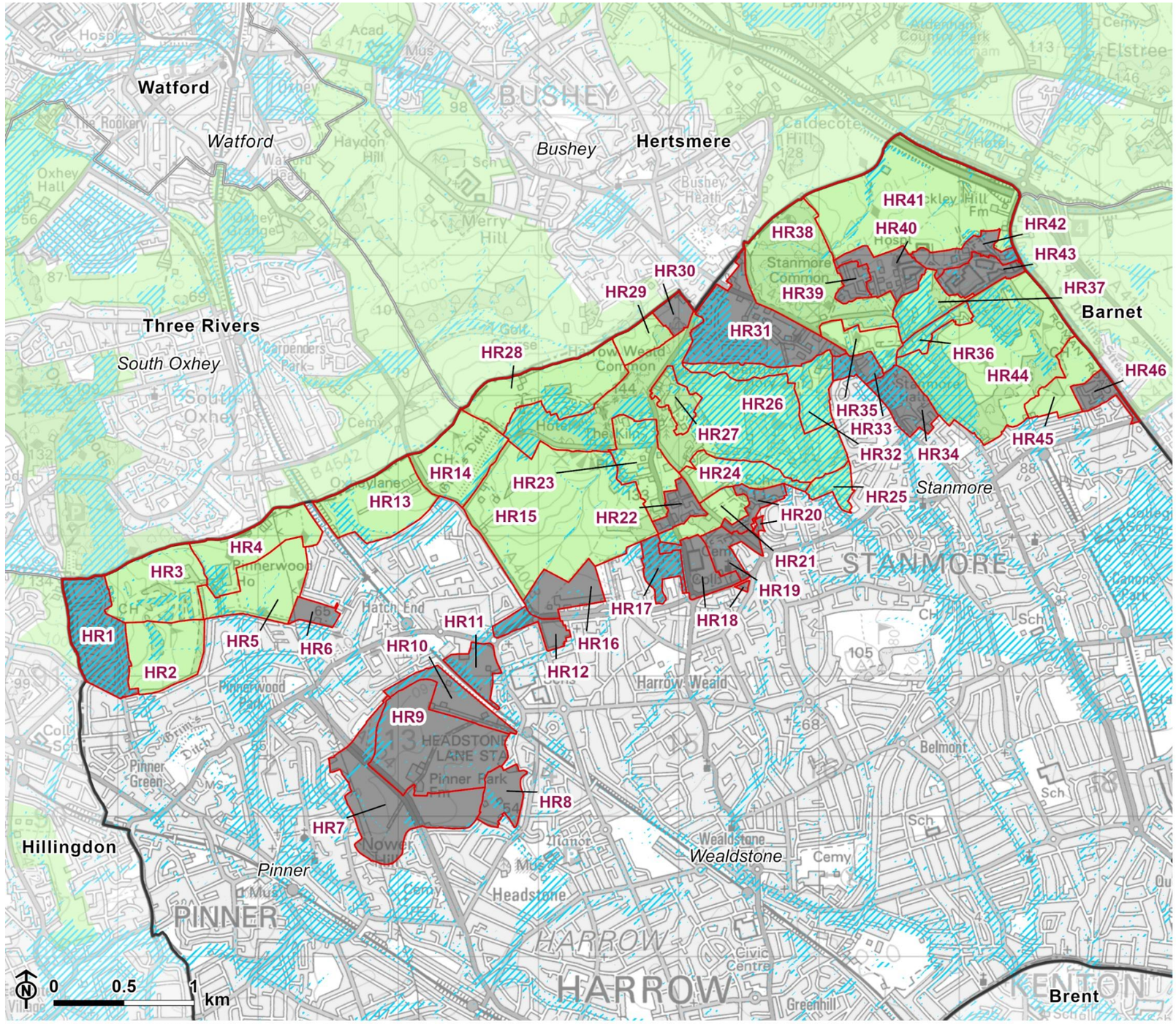
Potential grey belt in the London Borough of Harrow

3.284 Having regard to the definition set out in the NPPF, the following areas of Harrow are defined as having potential for definition as grey belt land subject to further work by the borough:

- The developed parts of Pinner Hill (HR1).
- Pinner Rugby and Football Club pitches (HR6).
- The isolated open countryside, allotments and sports pitches surrounding Pinner Park Farm (parcels HR7-HR11) and directly north and south of Uxbridge Road (parcels HR11 and HR12).
- The contained and/or developed land north of Harrow Weald in between and either side of Brookshill Road and Clamp Hill Road (parcels HR17-H20 and HR22).
- Urbanised and partially developed land off Hive Road (HR30).
- The areas of substantial development north and south of The Common Road and Stanmore Hill Road (parcels HR31, HR33 and HR34).
- The areas of substantially developed and notably urbanised land along Brightwen Grove and in and around the Royal Orthopaedic Hospital (parcels HR39, HR40, HR42 and HR43).
- The area of substantial development west of Brockley Hill Road (HR46).

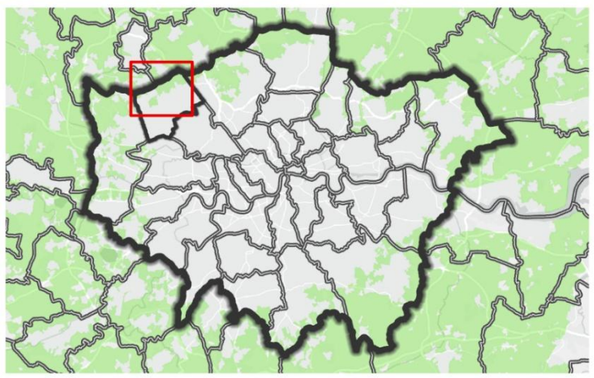
3.285 Figure 3.59 illustrates the area potentially suitable for definition as grey belt land within Harrow.

Figure 3.59: Green Belt land potentially suitable for definition as grey belt land



Legend

- Greater London boundary
- Harrow boundary
- Borough or district neighbouring Harrow boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets



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Highest and lowest contributing Green Belt land

3.286 The majority of Green Belt in Harrow makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include:

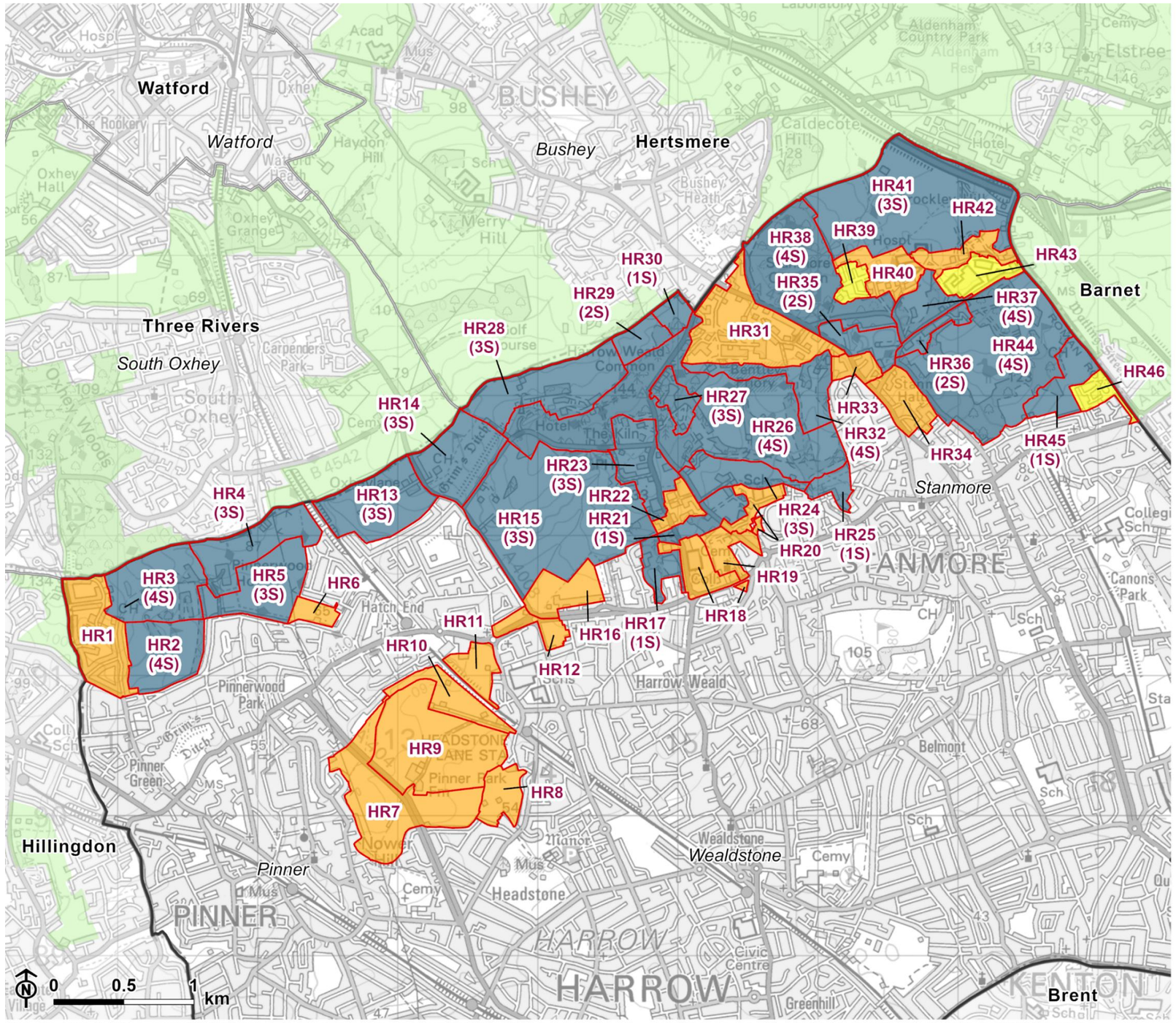
- Pinner Hill Golf Course (parcels HR2 and HR3) makes a strong contribution to purposes A, B, C and D.
- The land north of Hatch End (HR4 and HR5) make a strong contribution to purposes A, B and C.
- Grim's Dyke Golf Course (HR14) and the open countryside to the west (HR13) make a strong contribution to purposes A, B and C.
- The steep open slopes south of Old Redding Road (HR15) make a strong contribution to purposes A, C and D and the partially developed summit and upper slopes of the hill to the east (parcels HR23 and HR27) make a strong contribution to purposes A, B and C.
- The open fields on the lower slopes surrounding Lower Priory Farm (HR24) make a strong contribution to purposes A, C and D.
- The wooded slopes of the Bentley Priory Open Space and Grim's Dyke (parcels HR26 and HR32) make a strong contribution to purposes A, B, C and D.
- The more remote open fields of Harrow Weald Common (HR28) make a strong contribution to purposes A, B and C and the open fields closer to Bushey (HR29) make a strong contribution to purposes A and C.
- Stanmore Common Woodland (HR38) makes a strong contribution to purposes A, B, C and D.
- The open playing fields and surrounding woodland and water associated with Grove Fields and Stanmore Cricket Club (HR35) make a strong contribution to purposes A and B.
- The rolling fields and woodland surrounding and west of Brockleyhill Farm (HR41) make a strong contribution to purposes A, B and C.
- The open woodland and clearings north of Wood Lane (HR37) and the wooded slope and scrubland of Stanmore Country Park (HR44) make a strong contribution to purposes A, B, C and D.

3.287 The areas within Harrow that contribute the least to the Green Belt purposes are almost entirely developed with very limited openness and in locations that make no or very limited contribution to the setting and special character of historic towns.

This includes parcels HR39, HR43 and HR46, all of which make no more than a weak/no contribution to the Green Belt purposes.

3.288 Figure 3.60 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.60: Highest contribution to NPPF Green Belt purposes



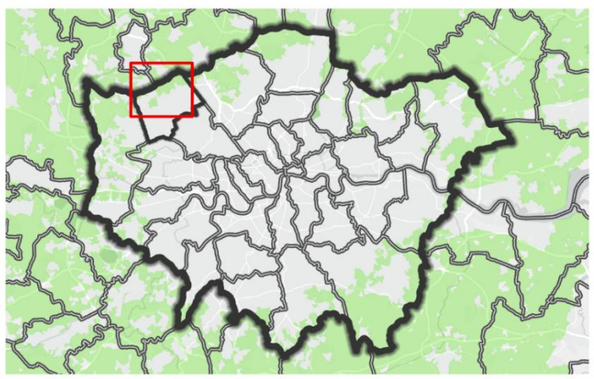
Legend

- Greater London boundary
- Harrow boundary
- Borough or district neighbouring Harrow boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.289 In light of the scale and contiguity of Green Belt land in Harrow and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with South Oxhey, Bushey and Borehamwood through a combination of development via Elstree, the Royal National Orthopaedic Hospital and adjacent ribbon development and the significant consolidation, densification and/or expansion of the existing ribbon development connecting Greater London with Bushey and South Oxhey would have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - South Oxhey and Pinner and Wealdstone via Pinner Green, Pinnerwood Park and Hatch End.
  - Bushey, Stanmore/Edgware and Borehamwood.
  - Consolidation, densification and/or expansion of the existing ribbon development connecting Bushey and Stanmore and Wealdstone (via Harrow Weald).
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release or development of the open higher ground around Pinner Hill, that represents an important part of the open setting of historic Pinner would have a fundamental impact on Purpose D.
- Release or development of the open higher ground to the north of the Borough that forms an important part of the distinctive open setting to Stanmore, Harrow and Hendon would have a fundamental impact on Purpose D.

Havering

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.290 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

3.291 All Green Belt land within the Havering is considered to be sufficiently near to Greater London to be considered to play some role in preventing their individual and/or combined sprawl. Consequently, all open and notably uncontained Green Belt land within the borough is considered to make a strong contribution to Purpose A. Notable exceptions include parcels HV6, HV55 and HV60, HV103 and HV145, all of which are contained by the large built-up area but represent large areas of open countryside with a strong sense of separation from surrounding urban areas such that they play an important role in preventing inward sprawl and therefore still make a strong contribution to Purpose A.

3.292 The vast majority of the wider open and largely uncontained areas make a strong contribution to Purpose A due to their strong sense of separation from the urban edge and/or lack of physical features to restrict and contain development.

3.293 Development in between Collier Row and Havering-atte-Bower, Harold Hill/Harold Wood and Brickfields and Havering-atte-Bower, Harold Hill/Harold Wood and Noak Hill and Brentwood and Rainham and Wennington also play an important role in maintaining separation between Greater London and satellite settlements/areas, with the risk of their merging increasing their combined sprawling influence. This includes parcels HV32, HV38, HV41, HV47 and HV48 between Collier Row and Havering-atte-Bower, parcels HV62 and HV66 in between Harold Hill/Harold Wood and Brickfields and Havering-atte-Bower, parcels HV81-HV86 in between Harrold Hill/Harold Wood and Brentwood, parcel HV110 in between Cranham and the development east of the M25, and parcels HV156 and HV160 in between Rainham and Wennington and the industrial estates off New Road and London Road to the south-east.

3.294 Areas that are more contained by the large built-up area and associated with it make a more moderate contribution to Purpose A. These areas, whilst contained, maintain some sense of separation from urban areas and function to inhibit some notable inward sprawl from the large built up area. This includes areas to the west of Elm Park/Hornchurch (parcels HV2, HV3, HV5, HV7 and HV8) and Romford (parcels

HV11, HV13, HV17-25 and HV27), in between the urban areas of Collier Row and Harold Hill (parcels HV52, HV53, HV54, HV56 and HV58); and north of Rainham, that lie between the urban areas of South Hornchurch and Rainham (parcels HV139, HV140, HV143, HV144 and HV146). Less contained areas that are notably developed, have moderate sense of separation from the large built area and/or that have physical features to restrict and contain development also make a moderate contribution to Purpose A (parcels HV29, HV36, HV39, HV42, HV61, HV63, HV64, HV68, HV73, HV80, HV92, HV95, HV97, HV98, HV101, HV102, HV104, HV109, HV113, HV129, HV136, and HV157-HV159).

3.295 Land that contains significant areas of development and/or is wholly or significantly contained by, and has a resulting strong relationship with, the large built-up area makes a weak/no contribution to Purpose A (parcels HV1, HV4, HV9, HV12, HV14-HV16, HV26, HV35, HV49, HV57, HV59, HV65, HV69, HV74 HV77, HV105, HV121, HV123, HV126, HV138 and HV154).

3.296 Figures 3.61 and 3.62 illustrate the variations in contribution to Purpose A across Havering.

Figure 3.61: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas: North

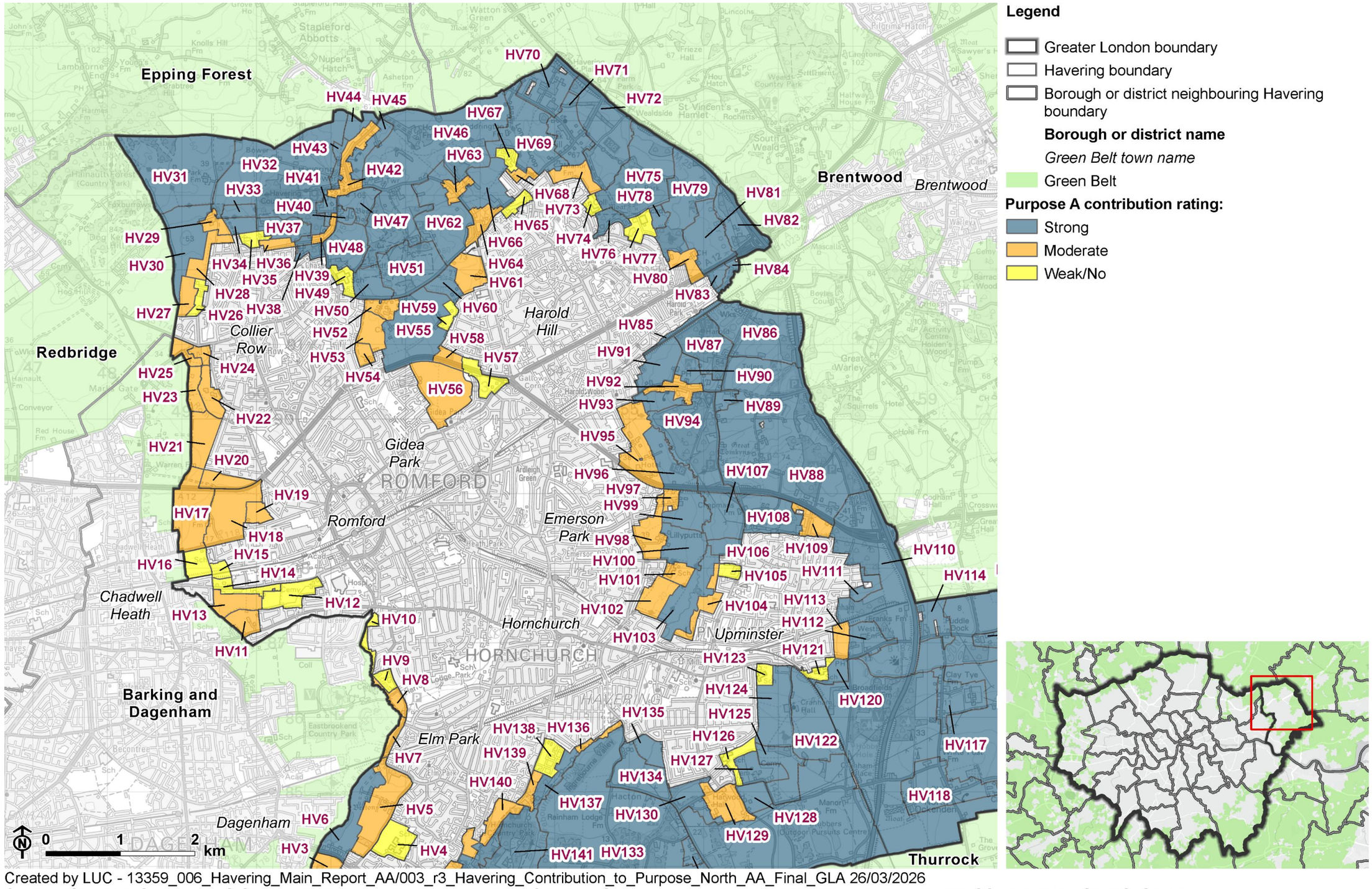

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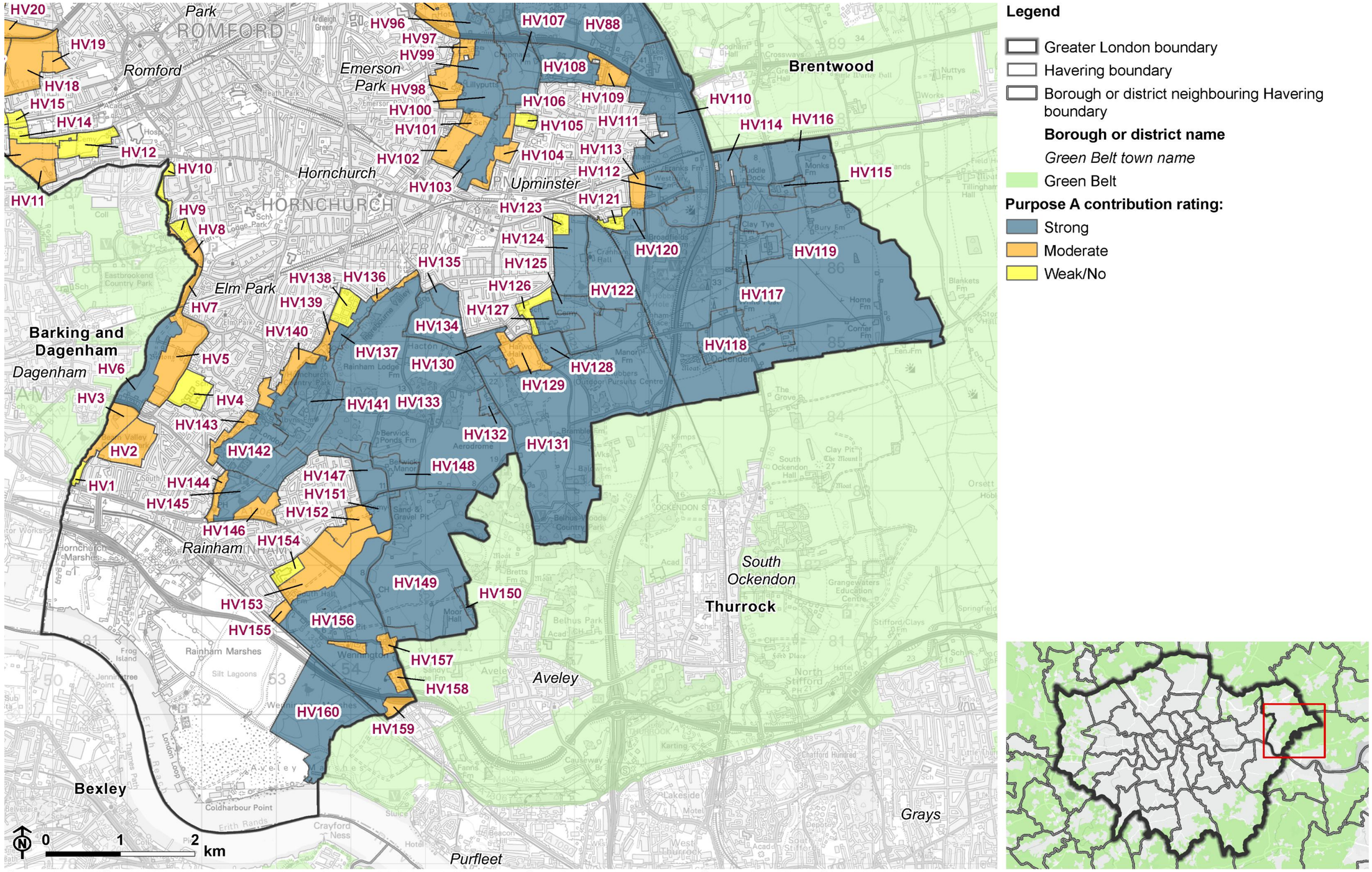
Figure 3.62: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas: South



Legend

- Greater London boundary
- Havering boundary
- Borough or district neighbouring Havering boundary
- **Borough or district name**
- *Green Belt town name*
- Green Belt

Purpose A contribution rating:

- Strong
- Moderate
- Weak/No

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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.297 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.298 Land that makes a strong contribution to Purpose B forms substantial parts of gaps between towns, including within the:

- Fragile gap between the towns of Elm Park/Rainham (via South Horncurch) and Dagenham (parcels HV3, HV5 and HV6).
- Fragile gap between Collier Row/Romford and Chadwell Heath (parcels HV11, HV13, HV15-HV18, HV23 and HV25).
- Fragile gap between Collier Row and Harold Hill, or an important peripheral part of it (parcels HV51, HV52, HV53, HV55, HV56 and HV60).
- Fragile gap between Harold Hill/Harold Wood and Brentwood (parcels HV79, HV81, HV82, HV83, HV84 and HV86).
- Fragile gap between Cranham and Emerson Park, or an important peripheral part of it (parcels HV94, HV99, HV100, HV103, HV106 and HV107);
- Along the primary connecting features in the developed moderate gap between Cranham/Upminster and Basildon (parcels HV110 and HV116).
- Fragile gap between Rainham and Elm Park (via South Hornchurch) (parcels HV141, HV142 and HV145).
- Along the primary connecting features in the developed moderate gap between Rainham and the Thurrock built-up area, including Aveley (parcels HV156 and HV160).

3.299 Land that makes a weak/no contribution to Purpose B includes land that does not lie within a gap between towns (parcels HV68-HV72), land that is particularly or largely developed, generally in moderate gaps between towns (parcels HV9, HV26, HV35, HV39, HV42, HV49, HV63-HV65, HV74, HV77, HV92, HV109 and HV138) and/or contained and strongly influenced by the surrounding urban areas and consequently more peripheral to moderate gaps between towns (parcels HV10, HV33-HV37, HV43-HV45, HV57, HV76, HV95, HV124 and HV139).

3.300 The remaining areas of the borough's Green Belt land, accounting for the vast majority of Green Belt land in the borough, make a moderate contribution to this purpose. These moderate contributions are for a range of reasons which all result in them representing less than substantial parts of gaps between towns, by virtue of

their wider nature, being notably peripheral to fragile gaps and/or being more contained or urbanised by urban areas. These areas are still generally open, connected to wider gaps and sufficiently distinct that they still play some separating role between neighbouring towns.

3.301 Figures 3.63 and 3.64 illustrate the variations in contribution to Purpose B across Havering.

Figure 3.63: Contribution to Purpose B – Prevent the merging of neighbouring towns: North

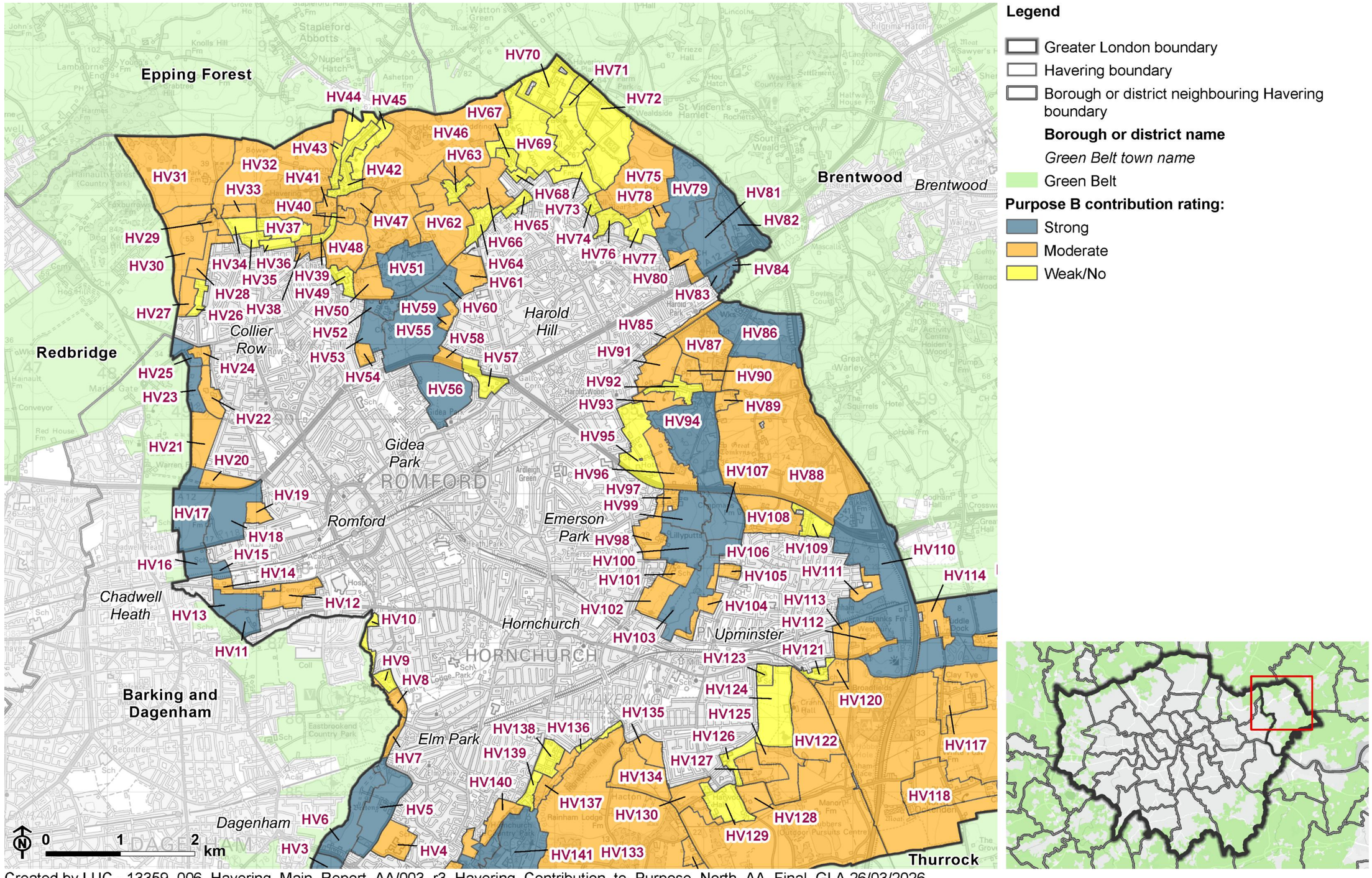

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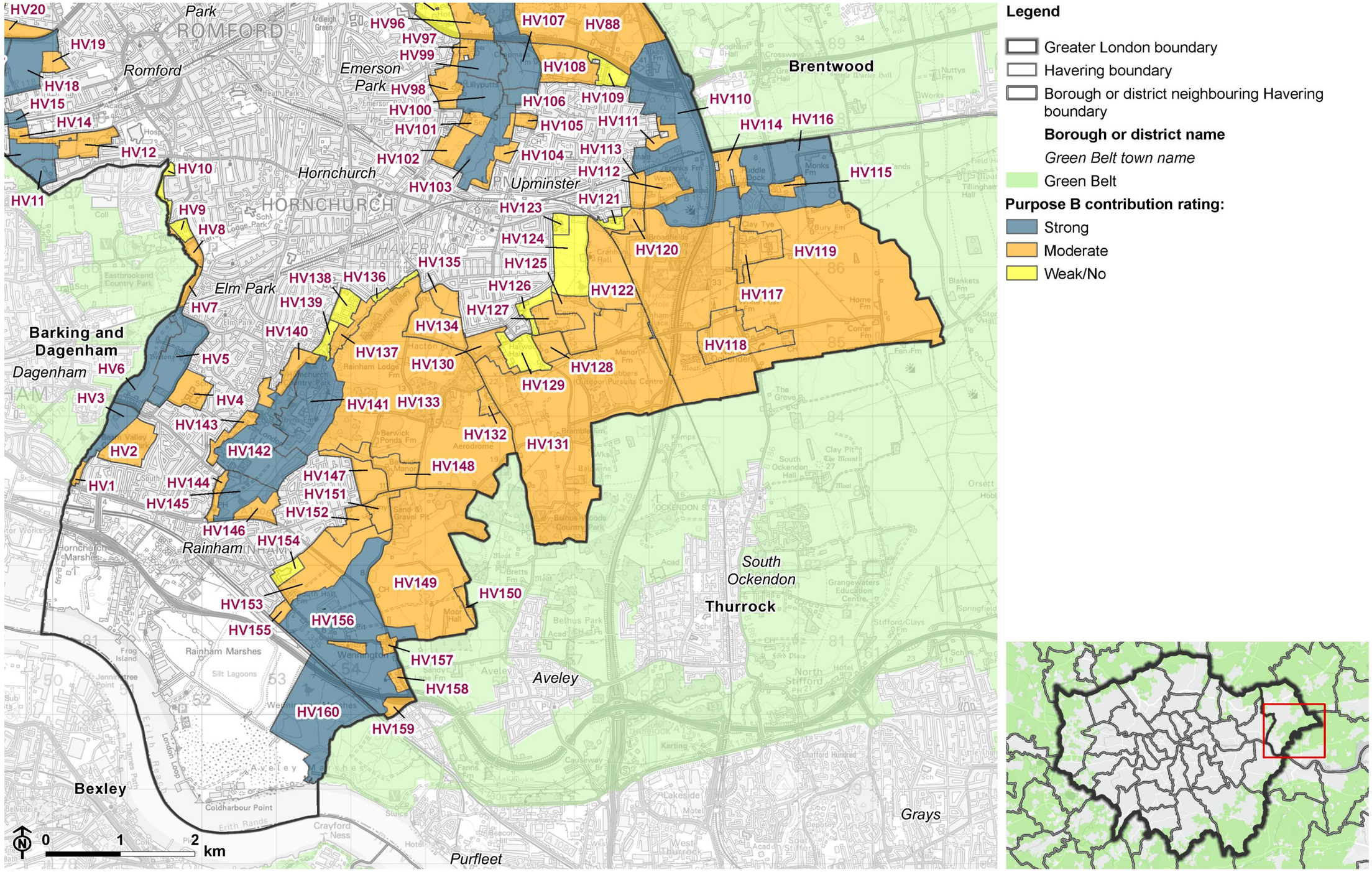
Figure 3.64: Contribution to Purpose B – Prevent the merging of neighbouring towns: South



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.302 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

3.303 The majority of the Green Belt land in the borough is open and has a clear connection with the wider countryside and therefore makes a strong contribution to Purpose C.

3.304 Green Belt that makes a strong contribution to Purpose C is generally subject to no significant urbanising influences and therefore is mostly open with a clear sense of separation from urban areas. In addition, where development would have a significant urbanising influence on adjacent open land, the land is considered to make a strong contribution to Purpose C, due to the fact that, if development were to take place in these locations, adjacent Green Belt land would likely be subjected to greater encroaching urbanising influences than is currently the case. These scenarios apply to the vast majority of parcels within the borough.

3.305 Green Belt land that contains significant areas of development and/or are significantly contained and/or urbanised by the urban area, limiting its relationship with the wider countryside make a weak/no contribution to Purpose C (parcels HV9, HV14, HV16, HV26, HV35, HV49, HV65, HV67, HV74, HV77, HV121, HV123, HV126, HV138 and HV154).

3.306 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where land is partially developed with some openness and relationship with the wider countryside (parcels HV38 and HV39, HV42, HV63, HV64 HV92, HV97, HV109, HV129 and HV157); or where Green Belt land is open but has land uses associated with the urban area rather than the open countryside, such as sports playing fields or allotments (parcels HV4, HV5, HV11, HV16, HV19, HV22, HV27, HV57, HV59, HV101, HV152 and HV154); and/or where land is open but has limited relationship with the wider countryside such that development would not have a notably wider encroaching influence (parcels HV2, HV4, HV8, HV10, HV11, HV11-HV13, HV15, HV17-22, HV24, HV27-HV29, HV36, HV54, HV58, HV68, HV73, HV83, HV95, HV98, HV102, HV140, HV143, HV148, HV151 and HV159).

3.307 Figures 3.65 and 3.66 illustrate the variations in contribution to Purpose C across Havering.

Figure 3.65: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment: North

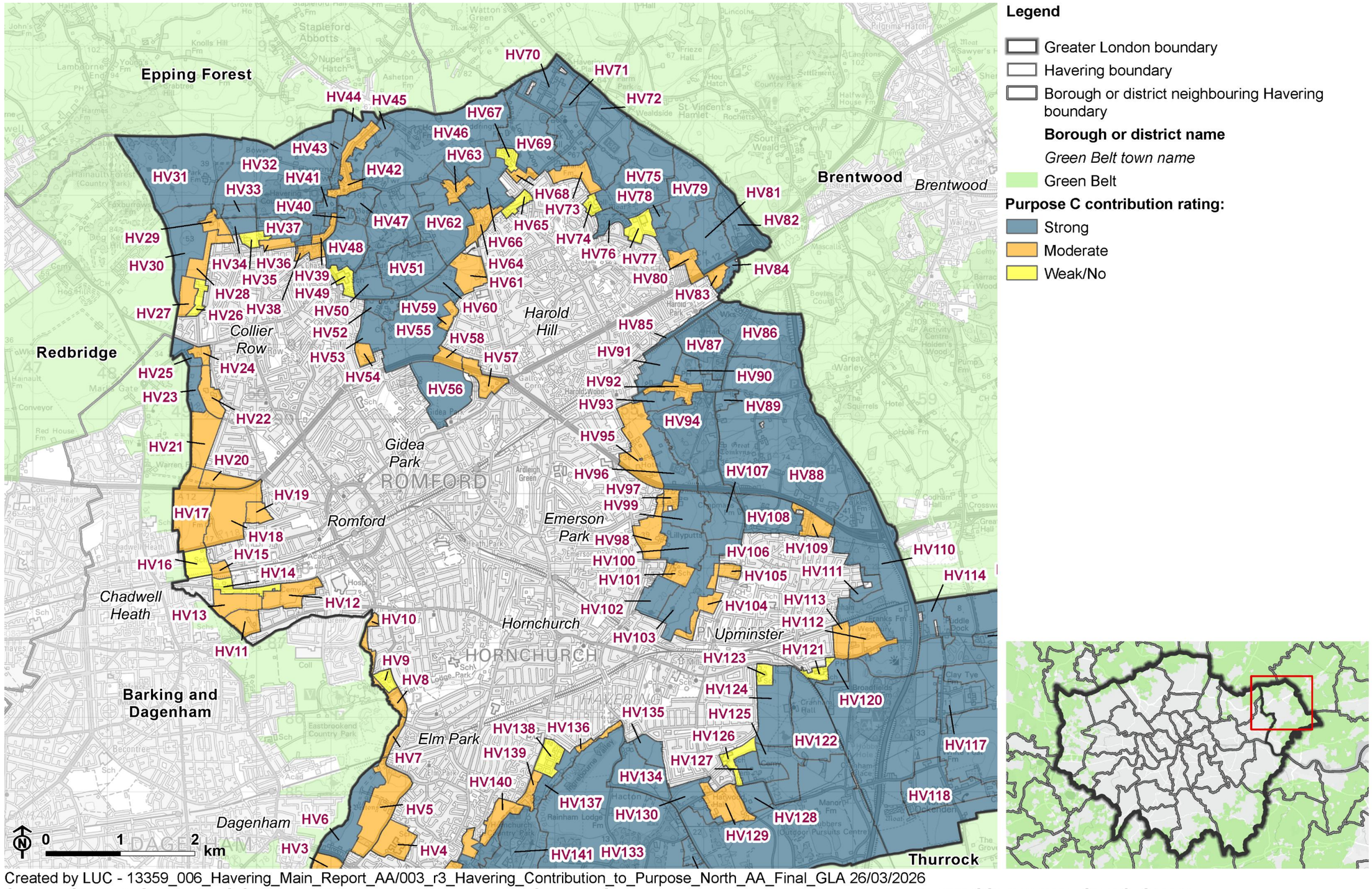

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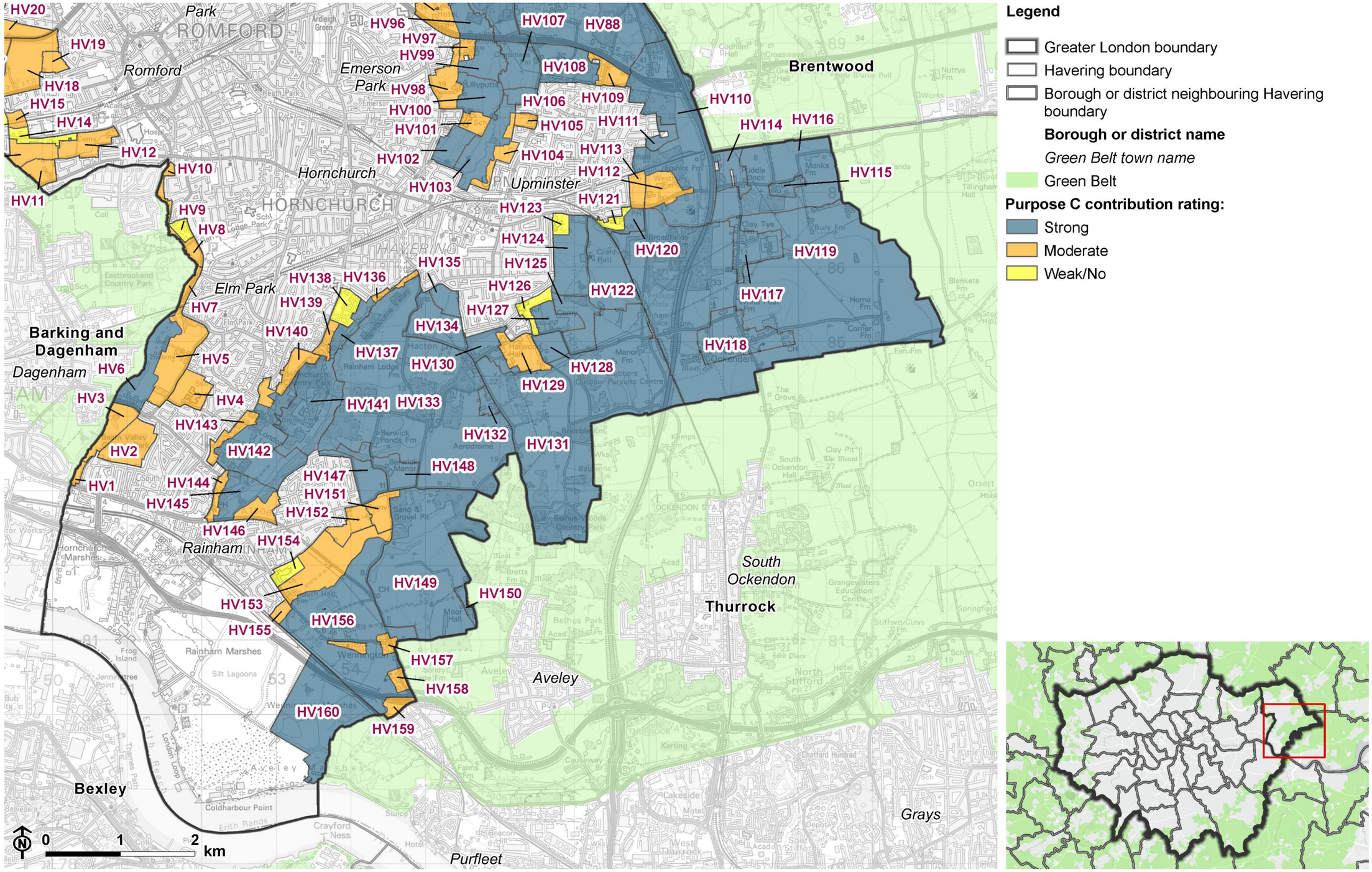
Figure 3.66: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment: South



Legend

- Greater London boundary
- Havering boundary
- Borough or district neighbouring Havering boundary
- **Borough or district name**
- *Green Belt town name*
- Green Belt

Purpose C contribution rating:

- Strong
- Moderate
- Weak/No

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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.308 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to twelve settlements large enough to be considered towns in Green Belt terms – Basildon, Chadwell Heath, Collier Row, Dagenham, Elm Park, Grays, Hainault, Harold Hill, Hornchurch, Rainham, Romford and Upminster.

3.309 Chadwell Heath, Collier Row, Elm Park, Hainault and Harold Hill are not considered to be historic towns. These settlements are predominantly suburban areas developed in the late 19th and/or early 20th centuries following the arrival of the railways and or as satellite towns to alleviate housing shortages in Inner London. They lack an identified 'historic urban core' identified within the Greater London Historic Landscape Characterisation (GLHLC, 2021) and do not contain any conservation area designations. Basildon is a new town located in Basildon District to the east of Havering, at such a distance that Green Belt land within the borough makes little to no contribution to its setting and special character.

3.310 However, the following towns have conservations areas which are located in relatively close proximity to Green Belt land:

- The **Dagenham Village Conservation Area** covers the historic former village core of the town. However, not much of the original fabric of the historic core remains, as noted within the Dagenham Village Conservation Area Appraisal (2009) 'most of the village buildings were knocked down to make way for new development which at the time was considered progress' and 'Crown Street, the main street of the village was largely destroyed in the 1960s and 1970s in preparation for the building of the Ibscott Estate'. In regard to landscape setting, the appraisal notes that the area 'is located on the Wantz Stream which flows into the Beam River' but that 'the conservation area today is predominantly surrounded by development dating from the Victorian era through to the late 1990's' with 'no distant views from the conservation area'.
- Grays is located to the east of Havering on the north bank of the River Thames in the neighbouring Unitary Authority of Thurrock. The historic core of the town is today indicated by a cluster of listed buildings including the Grade II* Church of St Mary the Virgin. Purfleet is also located on the north bank of the River Thames to the west of Gray with **Purfleet Conservation Area** and several listed buildings, including the Grade I listed Government Powder Magazine, indicating the historic core of the town. The setting of both Grays and Purfleet is focused primarily on the River Thames to the south, with Green Belt land within

Havering to the west located at some distance and playing little to no contribution to its setting and special character.

- Hornchurch occupies higher ground between the River Rom/Beam to the west and the River Ingrebourne to the east. The GLHLC identifies an area of 'historic urban core' within Hornchurch, in an area also protected partly by **St Andrew's Conservation Area**. The St Andrews Conservation Area Appraisal (n.d.) states that 'the focus and defining element of the Conservation Area is St. Andrew's Church, which resonantly identifies Hornchurch as an ancient place with long held significance, situated on the main route to London, today's Upminster Road'. To the west of St Andrew's lies **Langtons Conservation Area**, which the conservation area appraisal (2012) describes as being 'the cultural core of Hornchurch', and its character or special interest being defined as ''objects in a landscape', a grouping of cultural, ceremonial and recreational buildings and spaces in a verdant setting, with large areas of open space'. However, these historic parts of the town are surrounded by later development (including interwar development that directly borders St Andrew's) which limits any physical and visual relationship with surrounding Green Belt land within Barking & Dagenham Borough to the west.
- The historic core of Rainham is covered by **Rainham Conservation Area** and features a focal group of surviving historic buildings (including the Grade I listed Church of St Helen and St Giles; the Grade II* Rainham Hall and The Lodge; and the Grade II listed Vicarage and Redberry) that help retain a village character. The Rainham Conservation Area Appraisal (2025) identifies several 'additional qualities' of the area which includes 'an ancient settlement which developed in medieval times and retains a distinctive identity through its clear physical separation from surrounding built development'. In regard to setting the appraisal notes that the town is 'Divided by the valley of the River Ingrebourne from neighbouring Hornchurch, and with open countryside to the north and east, the settlement is still physically isolated from nearby suburban development, with only the approach from the west being densely built up'. It adds that 'its separation from other development is still pronounced, especially when approached from the eastern part of the A1306 and from the lanes to the north and east'.
- Romford, a market town since the 13th century, is centred on the medieval crossroads formed by the Market Place, High Street, North Street and South Street, but is encircled by a modern ring road (A1251) which physically and visually cuts off the historic core from its immediate suburban setting. This historic core is covered by **Romford Conservation Area**, the conservation area appraisal (2025) for which highlights that 'the main purpose of designation was to protect the group of historic buildings at the west end of the Market Place: St

Edward's Church, Church House, No 7 Market Place, Lloyds Bank, The Lamb Inn and the Golden Lion Inn'. This historic part of the town is surrounded by later development and the modern ring road which limits any physical and visual relationship with surrounding Green Belt land within Havering. To the north-east of Romford Conservation Area lies Gidea Park Conservation Area. This comprises a large part of the early 20th century residential suburb known as Gidea Park, with the designation relating specifically to the qualities of the suburban development rather than the historic town of Romford. Furthermore, whilst some Green Belt land at Romford Golf Course is included as setting area for the Conservation Area, there is no reference to this contributing to the setting and special character of the town of Romford.

- Upminster formed a historic parish that had three early centres of activity; the hamlets of Upminster, Hacton and Corbets Tey which merged to form the town. The area expanded into a suburb of London following the arrival of the railway in 1885, forming a terminal station on the London Underground. The historic core of Upminster, centred around the junction of St Marys Lane (A124 and B187) and Station Road/Corbets Tey Road (B1421), is today indicated by a handful of listed buildings including the Grade I Church of St Laurence. The historic core of Corbets Tey, on the southern edge of the urban area, is protected by **Corbets Tey Conservation Area** which lies almost entirely within the Green Belt. The Corbets Tey Conservation Area Character Appraisal (n.d.) sets out the special interest of the area, which includes a retained village character; a core of fine 17th and 18th century listed buildings centred upon High House; and the lake and listed bridge in Parklands open space, which was once part of the grounds of Gaynes Park. Additional qualities identified include 'a distinctive location on the edge of countryside, with its northern edge embedded in suburban development and the remainder bordering open countryside, which dominates the approach from east and west'. It also notes that the historic core 'is almost indistinguishable from surrounding development and feels like part of the urban area, but, on the approach from the west, it still introduces itself with some of the attributes of a village in a rural setting – parkland with a river and lake, 17th and 18th century houses at the junction, terraced cottages, and Harwood Hall'.

3.311 Based on the above, the following areas of the Green Belt land within Havering are considered to make a contribution to Green Belt Purpose D:

- Land to the south of Upminster which forms an open setting to the historic core of Corbets Tey, contributing to a remnant village character particularly when approaching from the east and west, and makes a moderate contribution to its setting and special character (parcels HV128-HV130).

- The valley of the River Ingrebourne which provides an open setting to the north of Rainham and helps retain its separate identity from Hornchurch through clear physical separation, especially when approached from the east along the A1306, makes a moderate contribution to its setting and special character (parcels HV144-HV146).

3.312 Other areas of the borough are considered to make a weak or no contribution to Purpose D. It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristic.

3.313 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.314 Figures 3.67 and 3.68 illustrate the variations in contribution to Purpose D across Havering.

Figure 3.67: Contribution to Purpose D – Preserve the setting and special character of historic towns: North

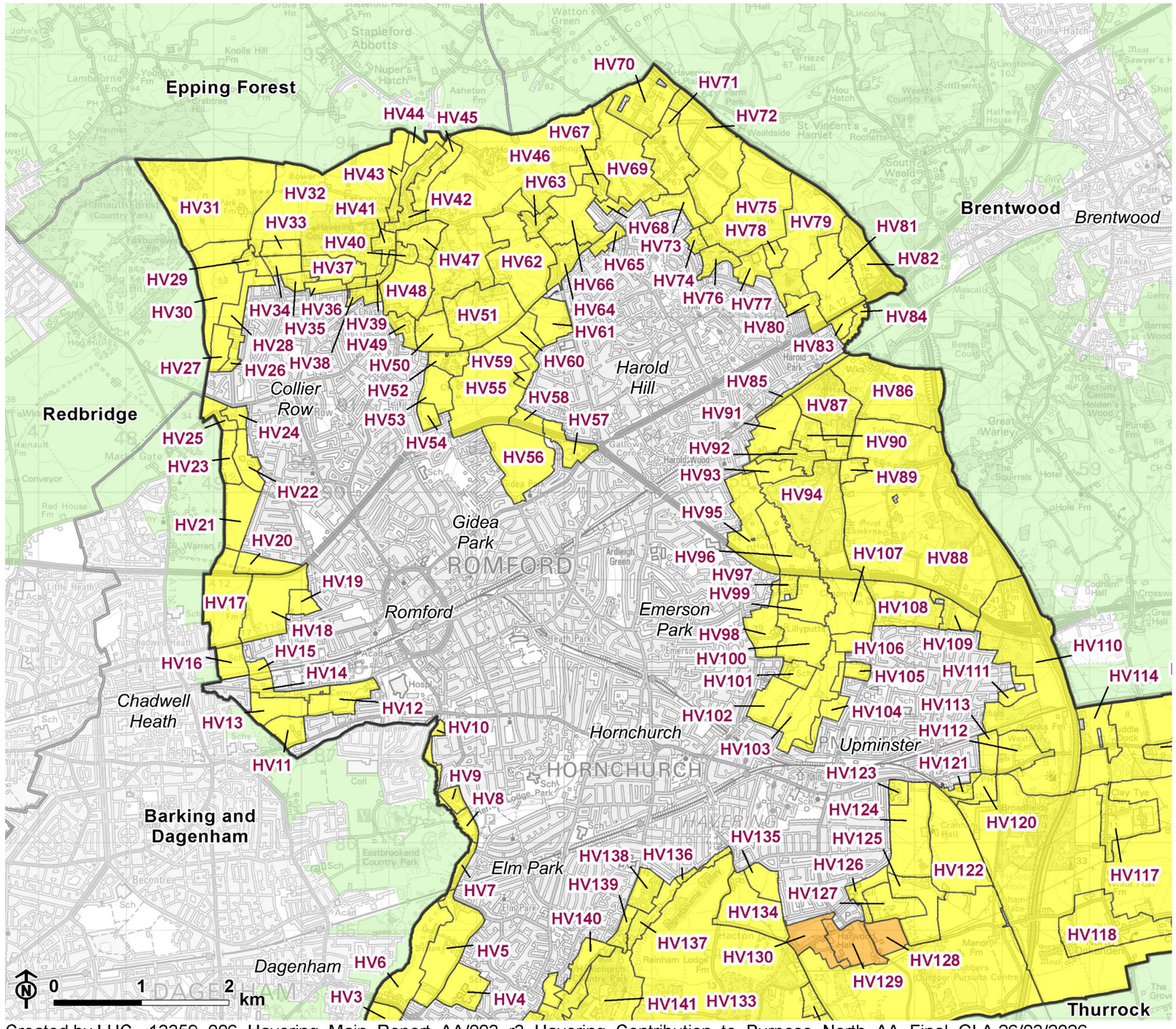

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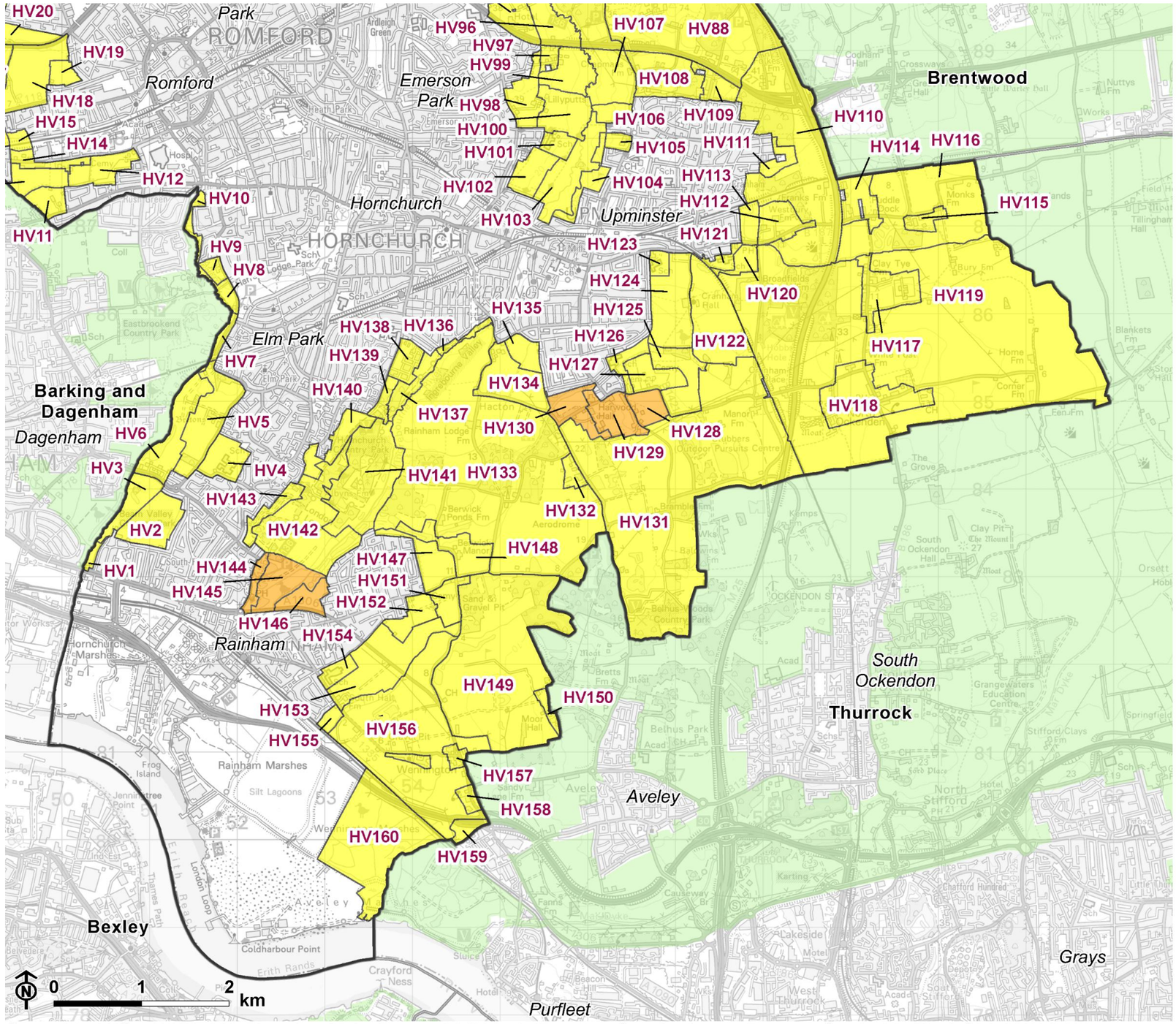
Figure 3.68: Contribution to Purpose D – Preserve the setting and special character of historic towns: South

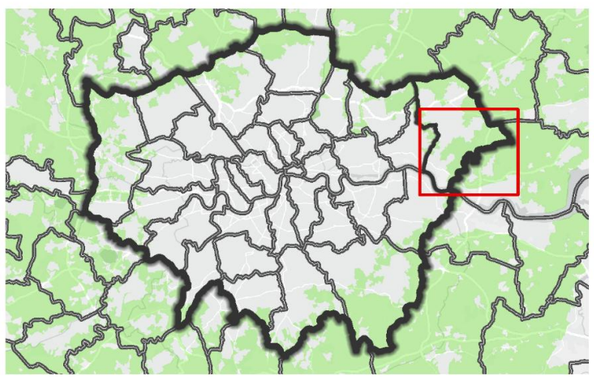


Legend

- Greater London boundary
- Havering boundary
- Borough or district neighbouring Havering boundary
- **Borough or district name**
- *Green Belt town name*
- Green Belt

Purpose D contribution rating:

- Strong
- Moderate
- Weak/No



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Potential grey belt in the London Borough of Havering

3.315 Having regard to the definition set out in the NPPF, the following areas of Havering are defined as having potential for definition as grey belt land subject to further work by the borough:

- Land largely contained and urbanised by the urban areas of South Hornchurch and Dagenham (parcels HV1, HV2, HV4 and HV7-HV10).
- Land largely contained by the urban areas of Romford, Rush Green and Chadwell Heath (parcels HV12, HV14, HV19-HV22 and HV24).
- Land on the western and northern edge of Collier Row (parcels HV26, HV27, HV29, HV35 and HV36).
- The densest pockets of development at Havering-atte-Bower (parcels HV39 and HV42).
- Land between Collier Row and Harold Hill (parcels HV49, HV54, HV57-HV59 and HV61).
- Land to the north and east of Harold Hill (parcels HV63-HV65, HV67, HV68, HV73, HV74, HV77 and HV80).
- Land to the east of Harold Wood (parcels HV92 and HV95).
- Land contained and urbanised by Hornchurch and Upminster/Cranham (parcels HV97, HV98, HV101, HV102, HV104, HV105 and HV109).
- Land to the south-east of Upminster/Cranham (parcels HV113, HV121, HV123, HV126 and HV129).
- Land on the eastern edge of Hornchurch and northern edge of Rainham (parcels HV138-HV140, HV143, HV144 and HV146).
- Land to the south-east of Rainham and the industrial estates off New Road and London Road to the south-east (parcels HV152-HV155 and HV157-HV159).

3.316 Figures 3.69 and 3.70 illustrates the area potentially suitable for definition as grey belt land within Havering.

Figure 3.69: Green Belt land potentially suitable for definition as grey belt land: North

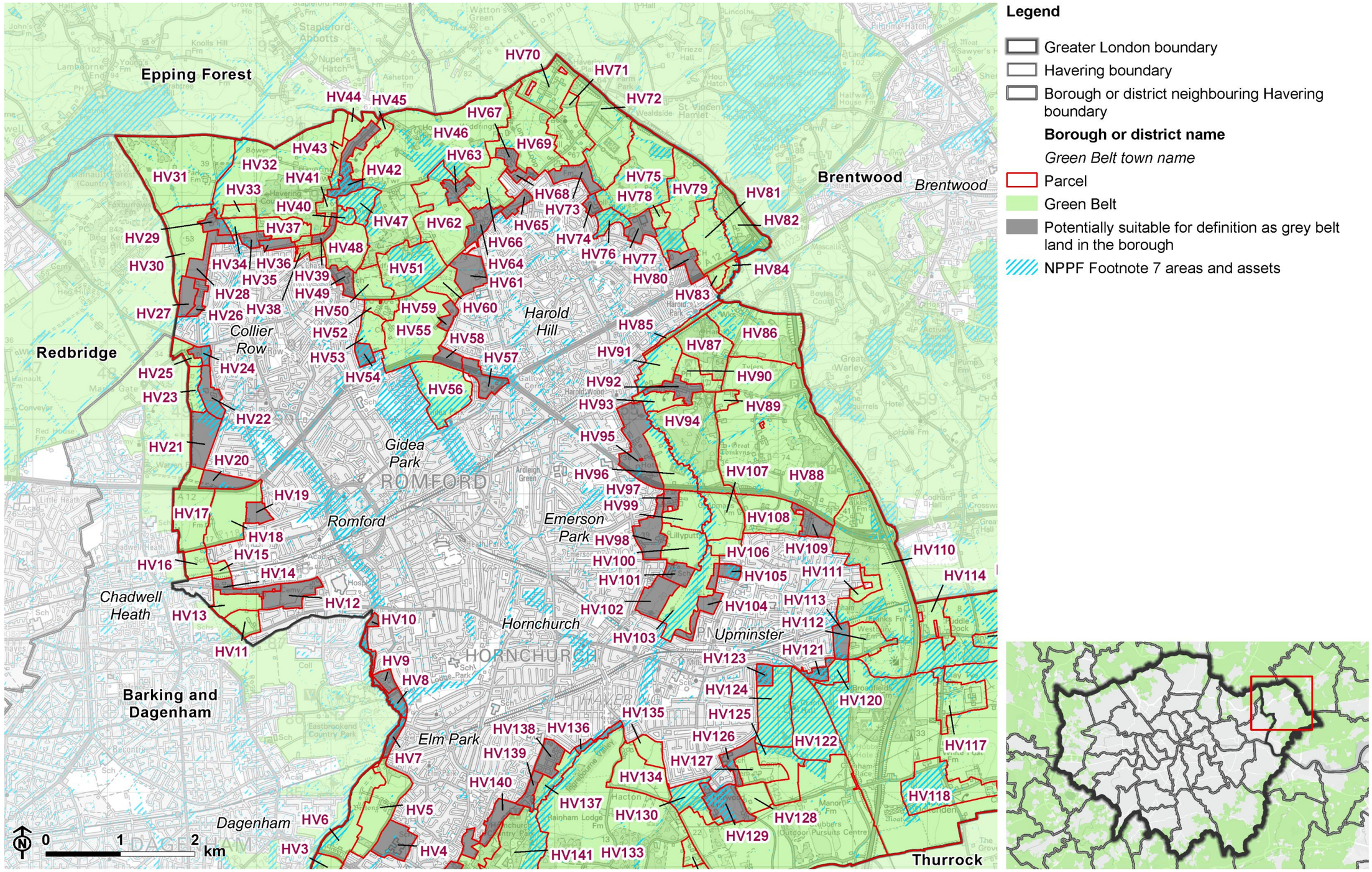

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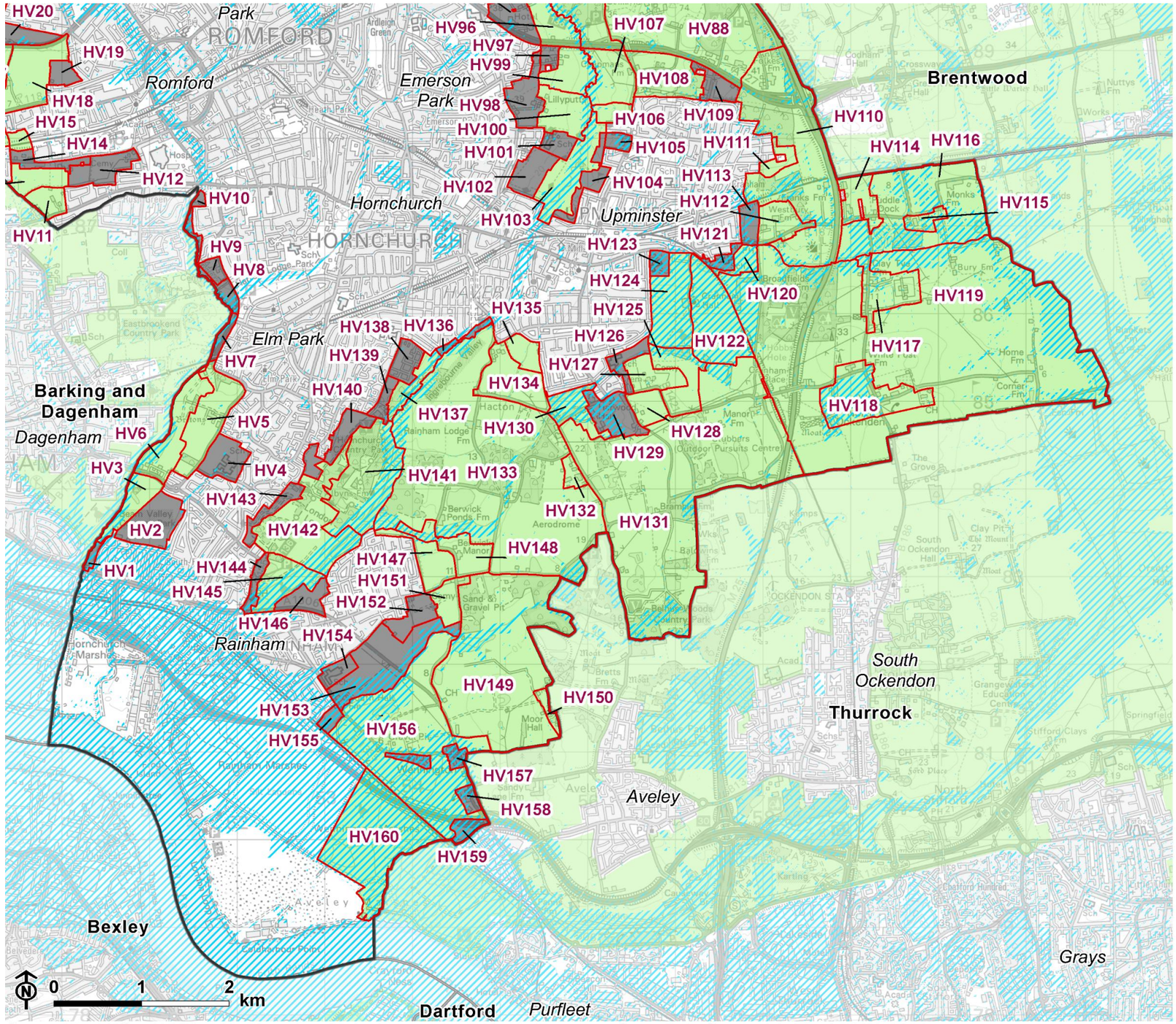
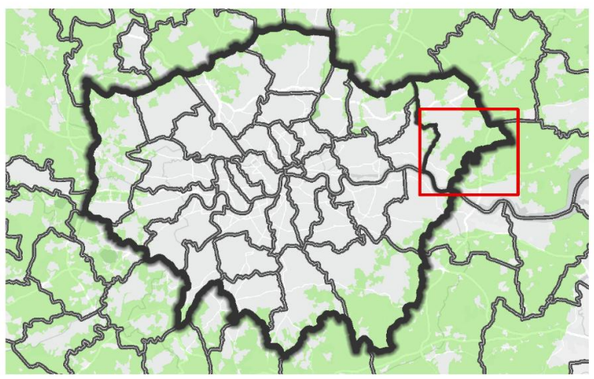
Figure 3.70: Green Belt land potentially suitable for definition as grey belt land: South



Legend

- Greater London boundary
- Havering boundary
- Borough or district neighbouring Havering boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets



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Highest and lowest contributing Green Belt land

3.317 The majority of Green Belt in Havering makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include open land:

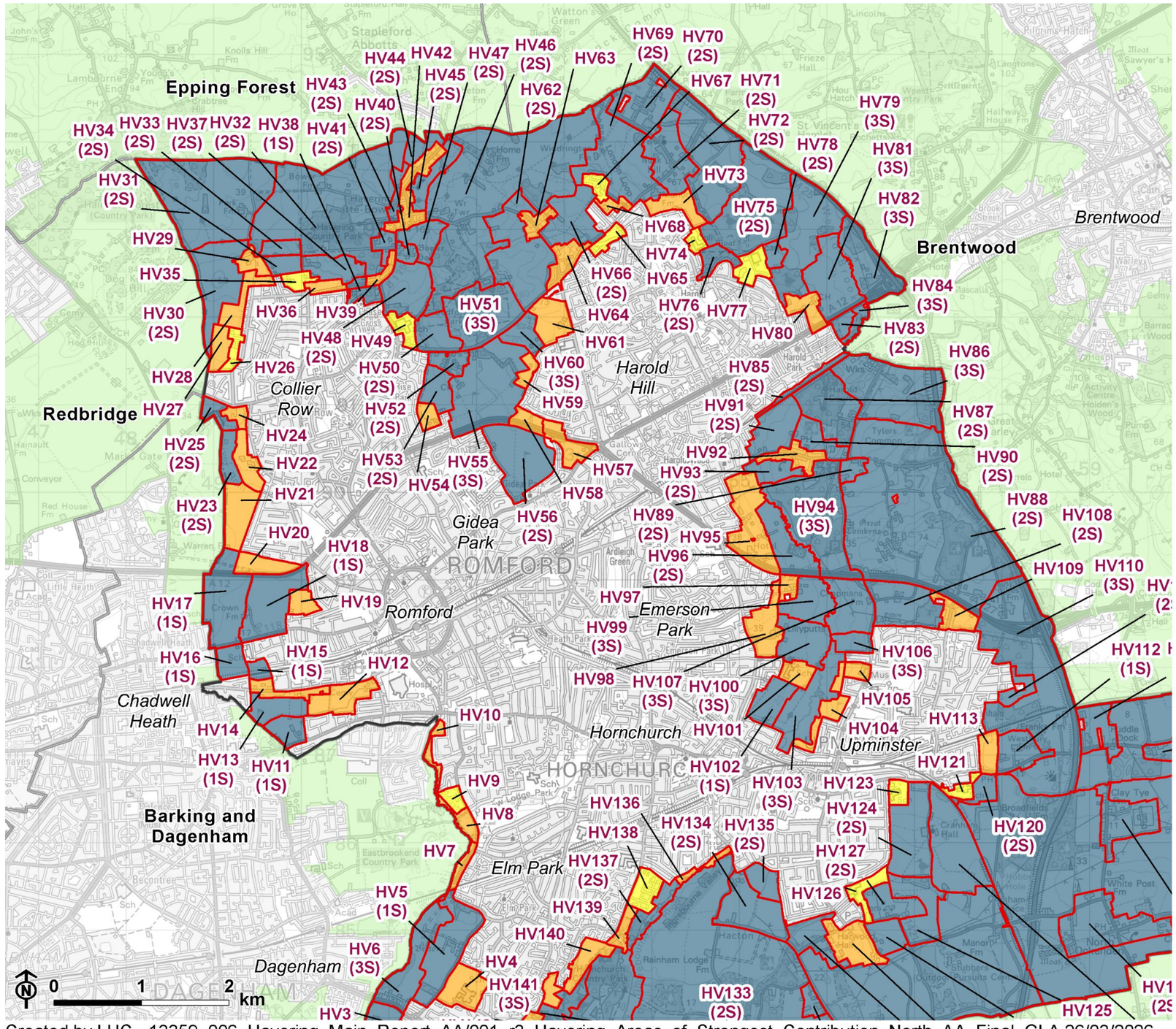
- In the south-west of the borough in the gap between Hornchurch and Dagenham, parcel HV6 makes a strong contribution to purposes A, B and C.
- In the north-west of the borough, north of Collier Row (parcels HV30-34, HV37, HV38, HV41, HV43 and HV44). These areas make a strong contribution to Purpose A, with most parcels (parcels HV30-34, HV37, HV41, HV43 and HV44) also making a strong contribution to Purpose C.
- In between Collier Row and Harold Hill, parcels HV51 and HV55 make a strong contribution to purposes A, B and C, with parcels HV50, HV52, HV53 and HV56 making a strong contribution to purposes B and C.
- In the north and north-east of the borough, north, north-west and north-east of Harold Hill (parcels HV45-47, HV50, HV51, HV62, HV66, HV69-72, HV75, HV76, HV79, HV81-HV84) land makes a strong contribution to purposes A and C, with some (parcels HV79, HV81, HV82 and HV84) also make a strong contribution to Purpose B.
- To the east of Harold Wood (parcels HV86-91, HV93, HV94 and HV96), land makes a strong contribution to purposes A and C. Parcel HV86 and HV94 also make a strong contribution to Purpose B.
- In between Hornchurch and Cranham, south of the A127 (parcels HV99, HV100, HV103 and HV106-108) make a strong contribution to Purpose A, with most parcels also making a strong contribution to purposes B and C.
- South and east of Upminster (parcels HV110-112, HV114-120, HV122, HV124, HV125, HV127, HV128 and HV130), land makes a strong contribution to Purpose A, with most parcels (parcels HV110, HV111, HV114-119, HV122, HV124, HV125, HV127, HV128 and HV130) also making a strong contribution to Purpose C. Some parcels (HV110 and HV116) also make a strong contribution to Purpose B.
- East of Elm Park/Hornchurch and north of Rainham (parcels HV132-135, HV137, HV141, HV142, HV145, HV147 and HV148), land makes a strong contribution to purposes A and C. Some parcels (parcels HV141, HV142 and HV145) that lie within the gap between Rainham and South Hornchurch also make a strong contribution to Purpose B.

- South and east of Rainham (parcels HV149, HV150, HV151, HV156 and HV160), land makes a strong contribution to Purpose A. Most parcels (parcels HV149, HV150, HV156 and HV160) also make a strong contribution to Purpose C, with some parcels (parcels HV156 and HV160) also making a strong contribution to Purpose B.

3.318 The areas within Havering that contribute the least to the Green Belt purposes tend to be developed Green Belt land where there is a distinct lack of openness, or notably contained pockets of Green Belt that are associated with urban areas, and notably isolated from the wider open countryside (parcels HV9, HV26, HV35, HV49, HV65, HV67, HV77, HV121, HV123, HV126, HV138 and HV154). These areas make no more than a weak/no contribution to the Green Belt purposes.

3.319 Figures 3.71 and 3.72 illustrate the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.71: Highest contribution to NPPF Green Belt purposes: North



Legend

- Greater London boundary
- Havering boundary
- Borough or district neighbouring Havering boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.

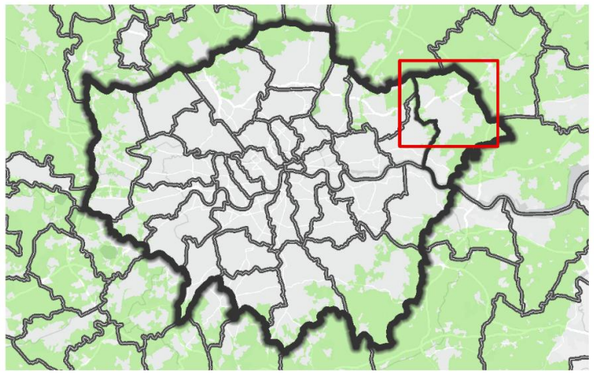


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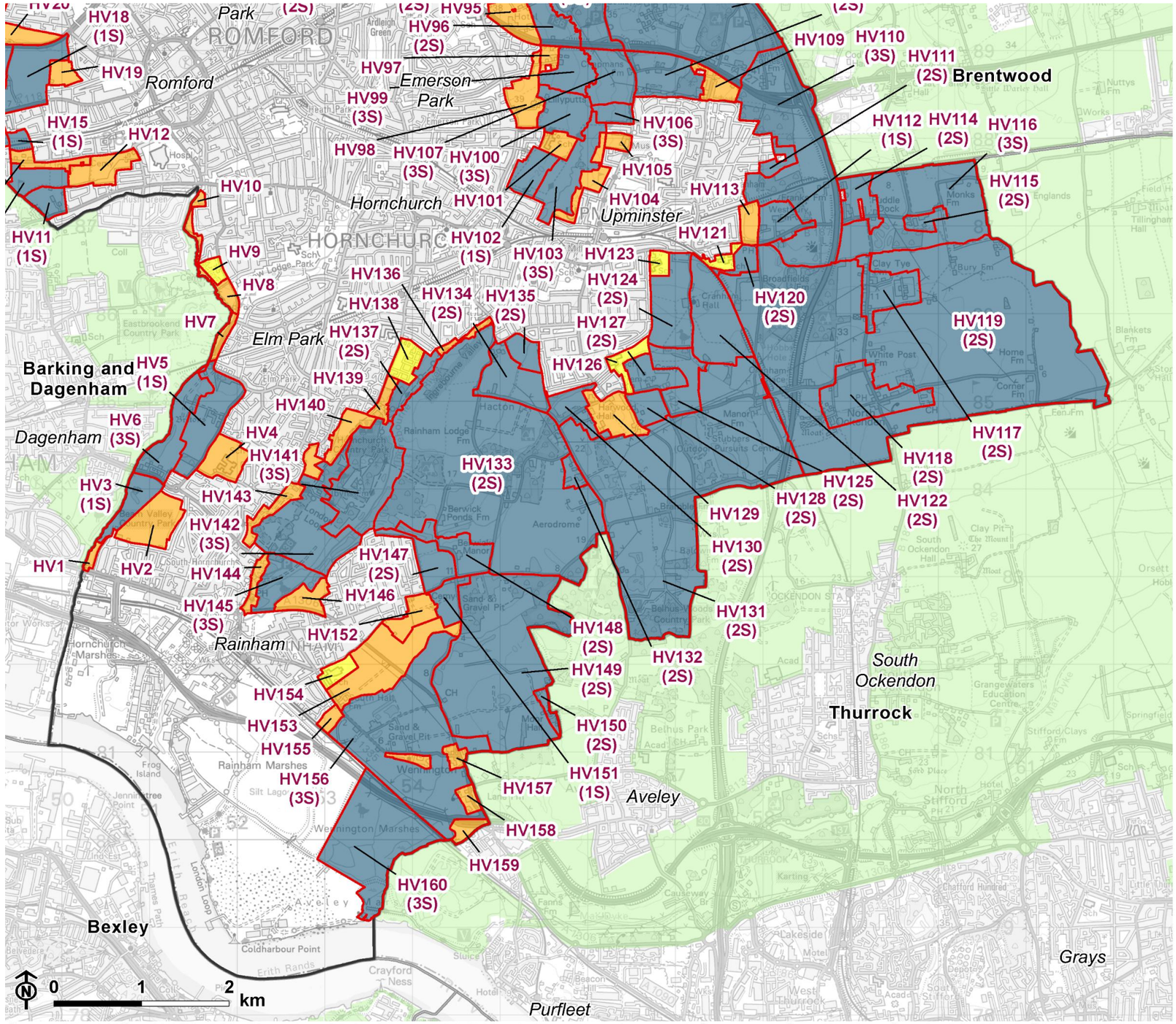
Figure 3.72: Highest contribution to NPPF Green Belt purposes: South



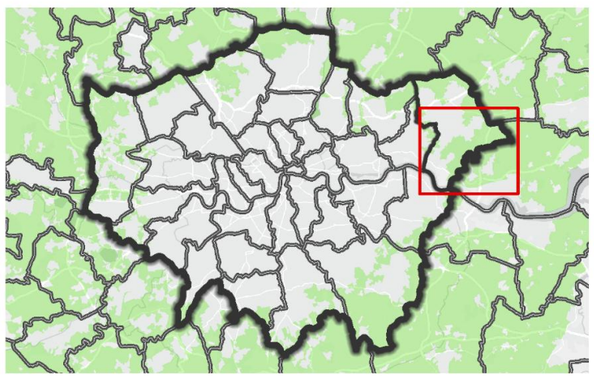
Legend

- Greater London boundary
- Havering boundary
- Borough or district neighbouring Havering boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.320 In light of the scale and contiguity of Green Belt land in Havering and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with Brentwood to the north-east, areas of development beyond the M25 to the east, and Wennington and the industrial estates off New Road and London Road to the south-east would have a fundamental impact on Purpose A
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Chadwell Health/Dagenham and Collier Row/Romford/Hornchurch/Elm Park and Rainham (via south Hornchurch).
  - Collier Row and Harold Hill.
  - Harold Hill/Harold Wood and Brentwood.
  - Cranham and Emerson Park.
  - Upminster/Cranham and Basildon.
  - Rainham and Elm Park/Hornchurch (via South Hornchurch).
  - Rainham and the Thurrock built-up area, including Aveley.
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.

Hillingdon

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.321 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

3.322 All Green Belt land within the Hillingdon is considered to be sufficiently near to Greater London to be considered to play some role in preventing their individual and/or combined sprawl. Consequently, all open and uncontained Green Belt land within the borough is considered to make a strong contribution to Purpose A. Notable exceptions include parcels which are contained by the large built-up area but represent large areas of open countryside with a strong sense of separation from surrounding urban areas such that they play an important role in preventing inward sprawl and therefore still make a strong contribution to Purpose A.

3.323 The areas that make a strong contribution to Purpose A include open and uncontained land lying adjacent or near to the large built up area that has a strong sense of separation from urban edge and/or lacking physical features to restrict and contain development (parcels HI1-HI7, HI10-HI21, HI24-HI27, HI33, HI34, HI37, HI43, HI44, HI47, HI48, HI51-HI54, HI56, HI57, HI60, HI62, HI64, HI72, HI74, HI75, HI80, HI84, HI134, HI140, HI144-HI147, HI178 and HI180).

3.324 Development to the west of Heathrow Airport would also further reduce the sense of separation between Greater London and Poyle, Colnbrook and Slough to the south-west (parcels HI45 and HI146), with the risk of their merging increasing their combined sprawling influence.

3.325 Areas that are more contained and urbanised by the large built-up area and/or or notably retained by physical features in reasonable proximity to the large built-up area make a more moderate contribution to Purpose A. These areas, whilst contained, maintain some sense of separation from urban areas and function to maintaining existing openness in the Green Belt and as such still make some contribution to Purpose A. This includes land between the urban areas of Northwood and Ruislip (parcels HI31, HI35, HI36, HI38); Ruislip and Ickenham (HI155); Ickenham, Uxbridge/Hillingdon and Northolt (parcels HI65, HI69, HI76, HI77, HI79, HI85, HI86, HI91 and HI94-HI96); Hayes and Yiewsley (parcels HI08 and HI111); West Drayton/Hayes and Heathrow Airport and Hounslow (parcels HI151, HI153-HI155, HI157, HI160, HI164, HI165, HI169-HI173, HI176, HI177, HI179 and HI181). Less contained areas that have moderate sense of separation from the large built area and/or that have physical features to restrict and contain development also make a moderate contribution to Purpose A (parcels HI28, HI29, HI78, HI132, HI50, HI132, HI133, HI135-HI137, HI142, HI149 and HI175), as do partially developed areas (parcels HI45, HI62, HI138, HI141 and HI156).

3.326 Land that contains significant areas of development (parcels HI9, HI22, HI30, HI39, HI46, HI88, HI92, HI109, HI110, HI116, HI120, HI123, HI126, HI128, HI150, HI159, HI166, HI168) and/or is wholly or significantly contained by, and has a resulting strong relationship with, the large built-up area (parcels HI40, HI41, HI42,

HI58, HI59, HI66, HI67, HI68, HI70, HI71, HI81, HI87, HI89, HI90, HI93, HI97, HI98, HI100-HI107, HI112-HI119, HI139, HI143, HI148, HI152, HI158, HI161-HI163, HI167 and HI174) makes a weak/no contribution to Purpose A.

3.327 Figures 3.73 and 3.74 illustrate the variations in contribution to Purpose A across Hillingdon.

Figure 3.73: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas: North

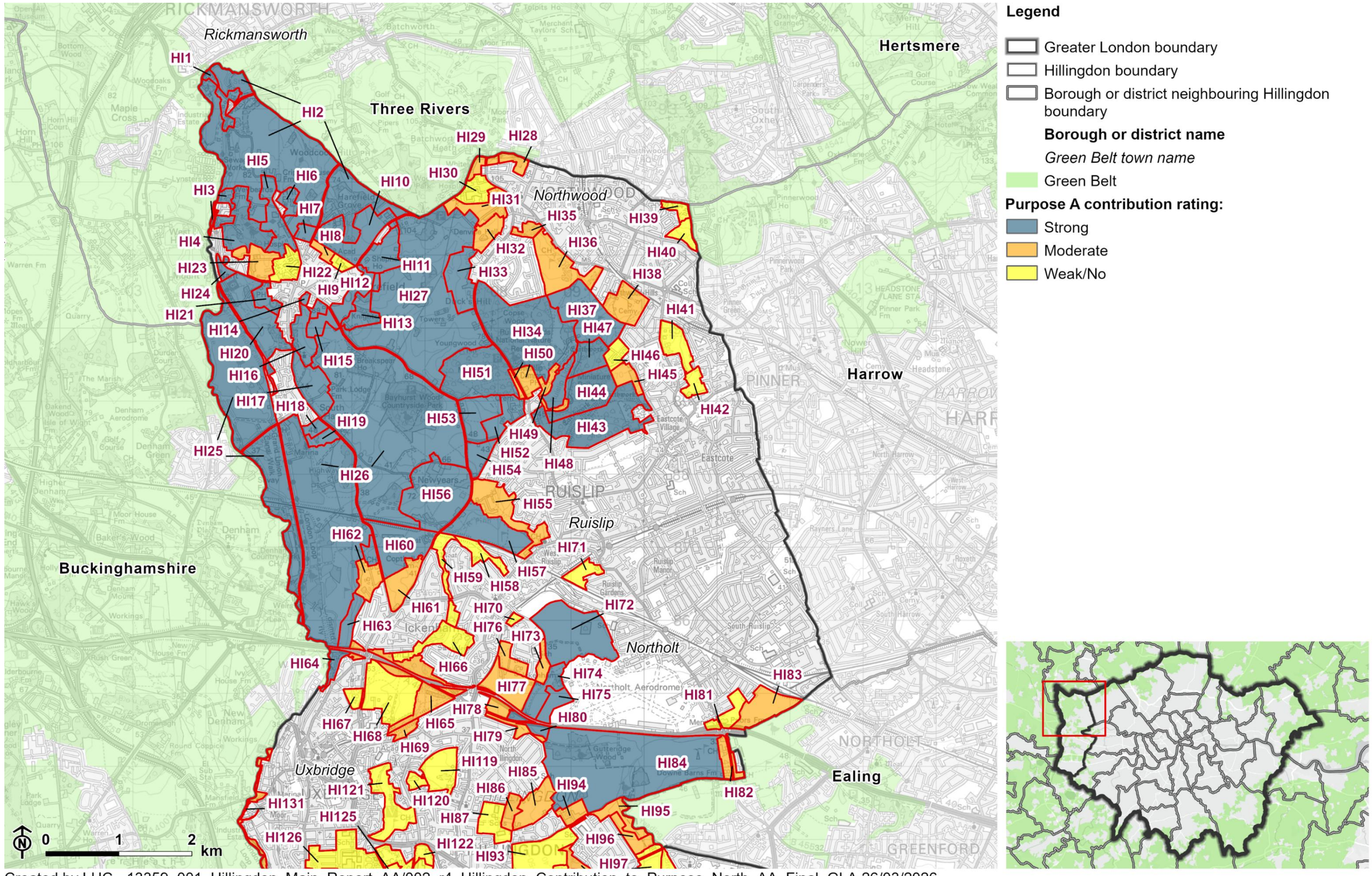

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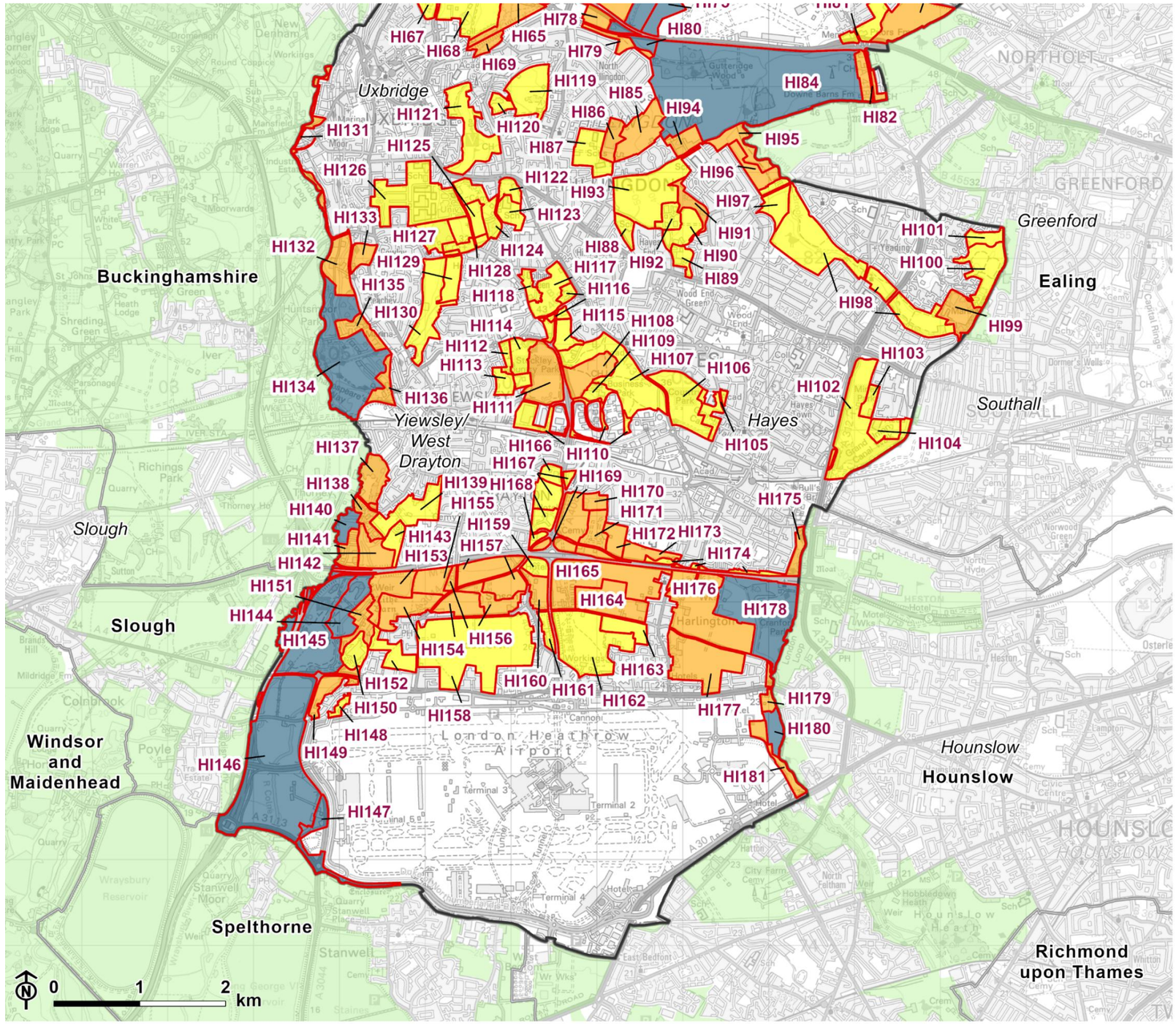
Figure 3.74: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas: South



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.328 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.329 Land that makes a strong contribution to Purpose B forms substantial parts of gaps between towns, including some remnant gaps between neighbouring towns that have already partially merged, including land within the:

- Gap between Northwood and Ruislip (parcels HI34, HI44 and HI47).
- Remaining gap between Ruislip and Uxbridge (via Ickenham) (parcels HI56 and HI57).
- Remaining gap between Uxbridge (via Hillingdon) and Northolt (parcels HI74, HI75, HI80 and HI84).
- Remaining gap between Hayes and Greenford in the neighbouring London Borough of Ealing via Yeading (parcels HI95-HI98).
- Remaining gap between Hayes (via Hayes End) and West Drayton/Yiewsley (parcels HI108 and HI111).
- Remaining gap between Hounslow (via Heathrow Airport), Yiewsley/West Drayton and Slough (via Colnbrook and Poyle) (parcels HI134, HI144 and HI146).
- Remaining gap between Hayes and Hounslow via Cranford and Heathrow Airport (parcels HI153-HI157, HI160, HI165, HI176 and HI178-HI181).

3.330 Land that makes a weak/no contribution to Purpose B includes land that does not lie within a gap between towns (parcels HI31, HI41, HI42, HI57, HI59, HI66, HI70, HI71, HI86, HI87, HI89-HI93, HI119, HI120, HI135 and HI148), land that is a very small part of wider moderate gaps between towns or notably peripheral to it (parcels HI18, HI38, HI61, HI62 and HI67), land that is largely developed (parcels HI9, HI22, HI30, HI39, HI46, HI92,, HI110, HI116, HI120, HI123, HI124, HI126, HI143, HI150, HI159, HI168, HI166) and/or contained and strongly influenced by the surrounding urban area and consequently more peripheral to gaps between towns (parcels HI14, HI40, HI61, HI81, HI105 and HI106, HI118, HI122, HI133, HI139, HI152 and HI167.

3.331 The remaining areas of the borough's Green Belt land, accounting for the vast majority of Green Belt land in the borough, make a moderate contribution to this purpose. These moderate contributions are for a range of reasons which all result in them representing less than substantial parts of gaps between towns, by virtue of

their wider or remnant nature, being notably peripheral to the core parts of gaps and/or being more contained or urbanised by urban areas. These areas are still generally open, connected to wider gaps and sufficiently distinct that they still play some separating role between neighbouring towns.

3.332 Figures 3.75 and 3.76 illustrate the variations in contribution to Purpose B across Hillingdon.

Figure 3.75: Contribution to Purpose B – Prevent the merging of neighbouring towns: North

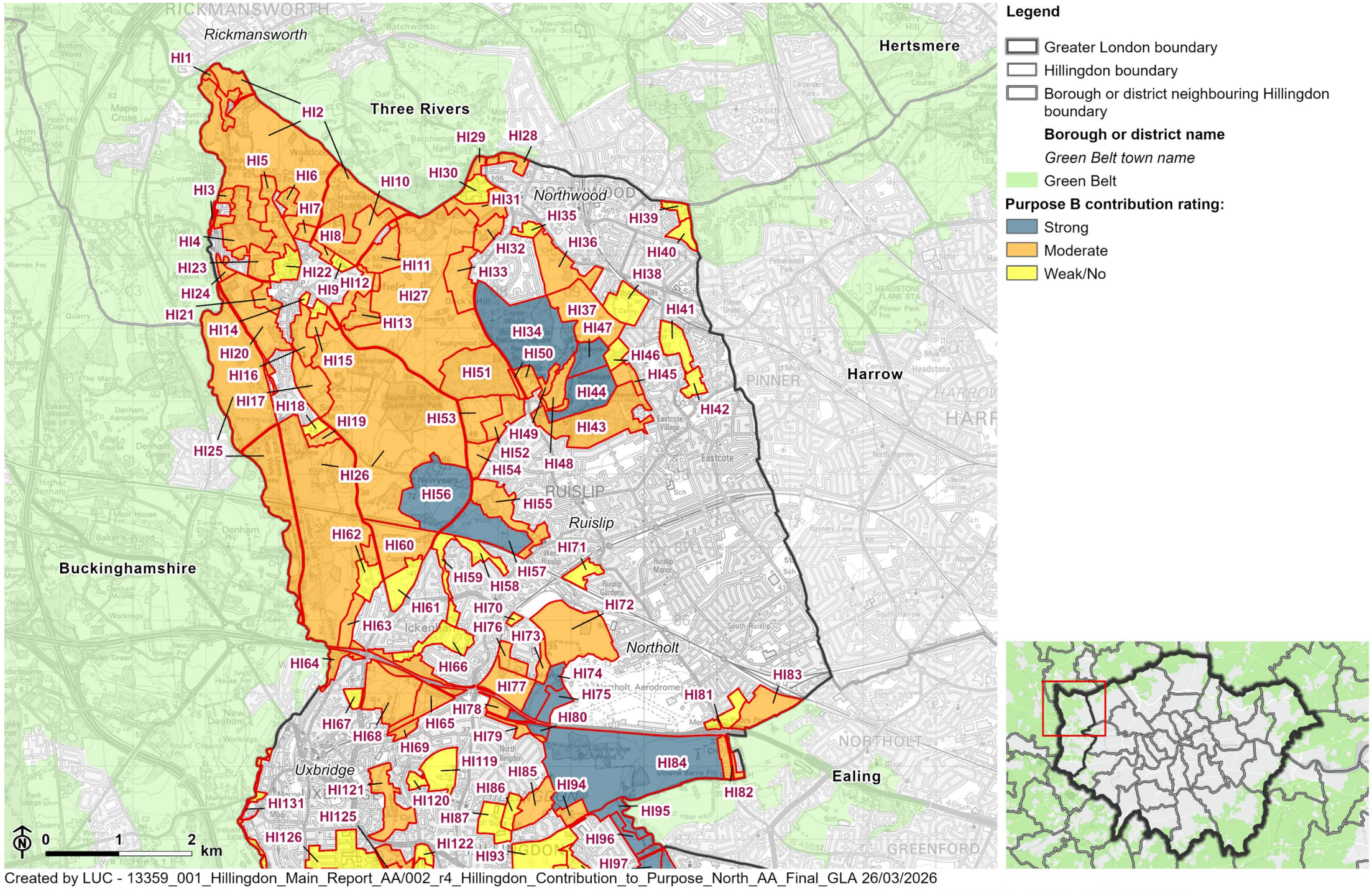

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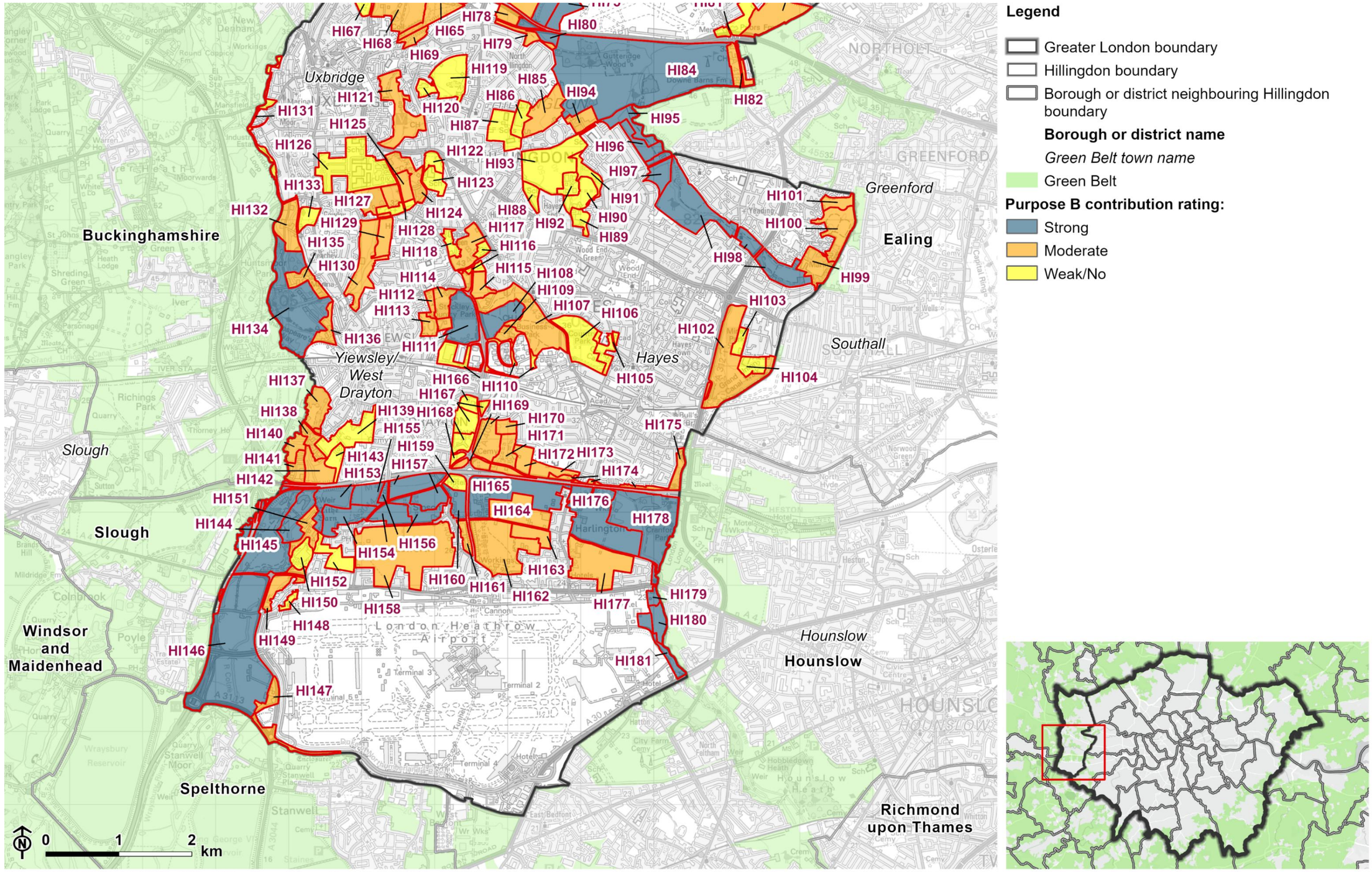
Figure 3.76: Contribution to Purpose B – Prevent the merging of neighbouring towns: South



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.333 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

3.334 The vast majority of the Green Belt land in the borough is open and has a clear connection with the wider countryside and therefore makes a strong contribution to Purpose C. Areas that make a strong contribution are countryside with a clear sense of separation from significant urbanising influences and a connection to wider countryside, including where development would have a significant urbanising influence on adjacent open land. If development were to take place in these locations, the surrounding Green Belt would generally be subject to a stronger urbanising influence than is currently the case, particularly development could be at risk of severing areas of open countryside from the wider countryside (parcels HI34, HI37 and HI47).

3.335 Green Belt land that contains significant areas of development and/or is urbanised by urban areas with limited relationship with the wider countryside make a weak/no contribution to Purpose C (parcels HI9, HI22, HI30, HI41, HI146, HI81, HI87, HI188, HI92, HI103-HI105, HI110, HI116, HI118, HI123, HI126, HI128, HI150, HI152, HI159, HI166 and HI168).

3.336 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where Green Belt land is open but has land uses associated with the urban area rather than the open countryside, such as sports playing fields or allotments (for example parcels HI8, HI14, HI38, HI40, HI52, HI68, HI71 and HI171) and/or where land is open but has limited relationship with the wider countryside such that development would not have a notably wider encroaching influence (for example parcels HI23, HI42, HI58 and HI59, HI67, HI70, HI76, HI79, HI85, HI86, HI106, HI112-HI115, HI117, HI121, HI122, HI124, HI125, HI127-HI130, HI139, HI147-HI149, HI151, HI153-HI155, HI157, HI158, HI160-HI165, HI167, HI170-HI174, HI177, HI179 and HI181), or where there are some urbanising influences (parcels HI39, HI45, HI62, HI138, HI141 and HI156).

3.337 Figures 3.77 and 3.78 illustrate the variations in contribution to Purpose C across Hillingdon.

Figure 3.77: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment: North

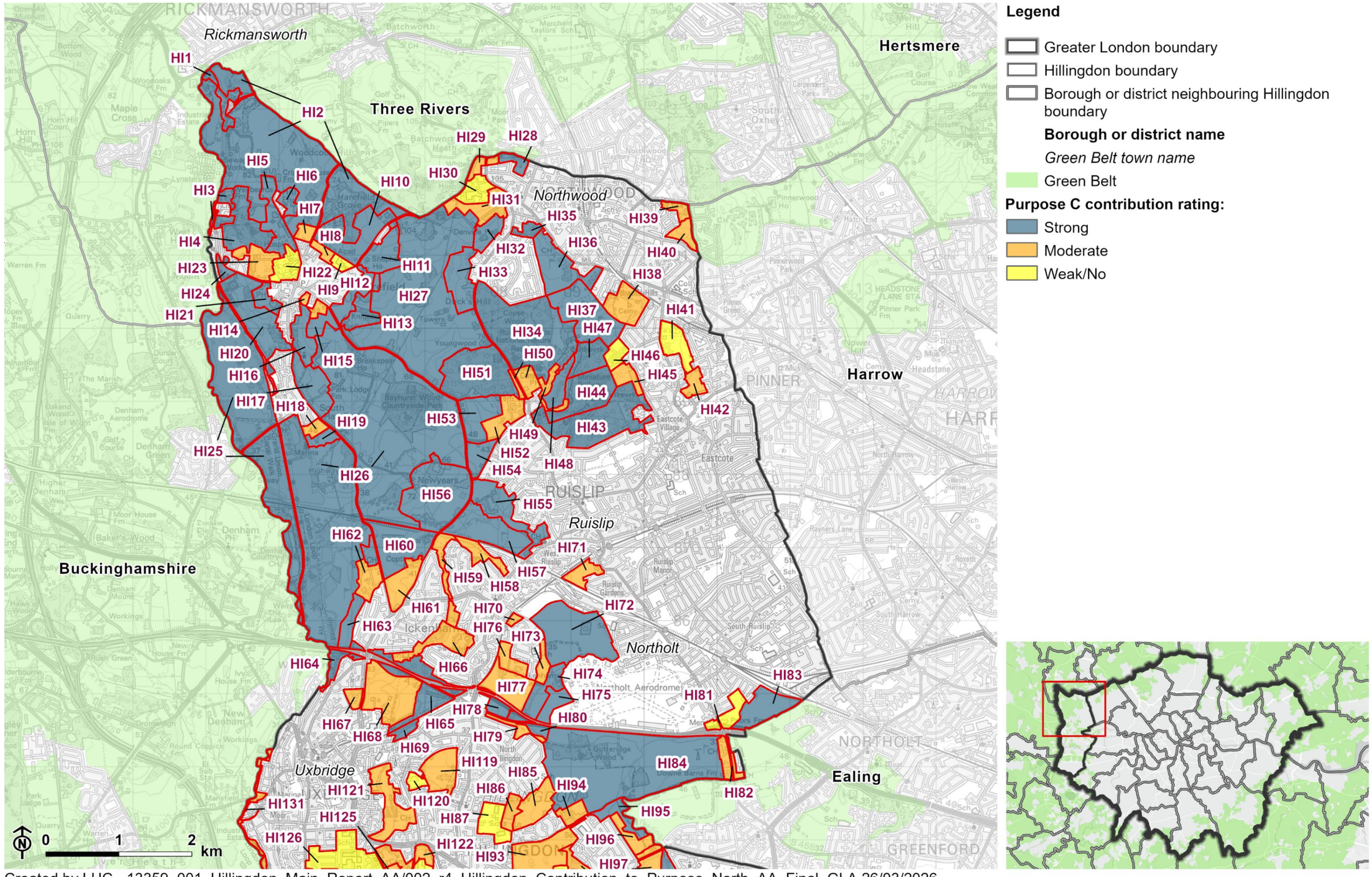

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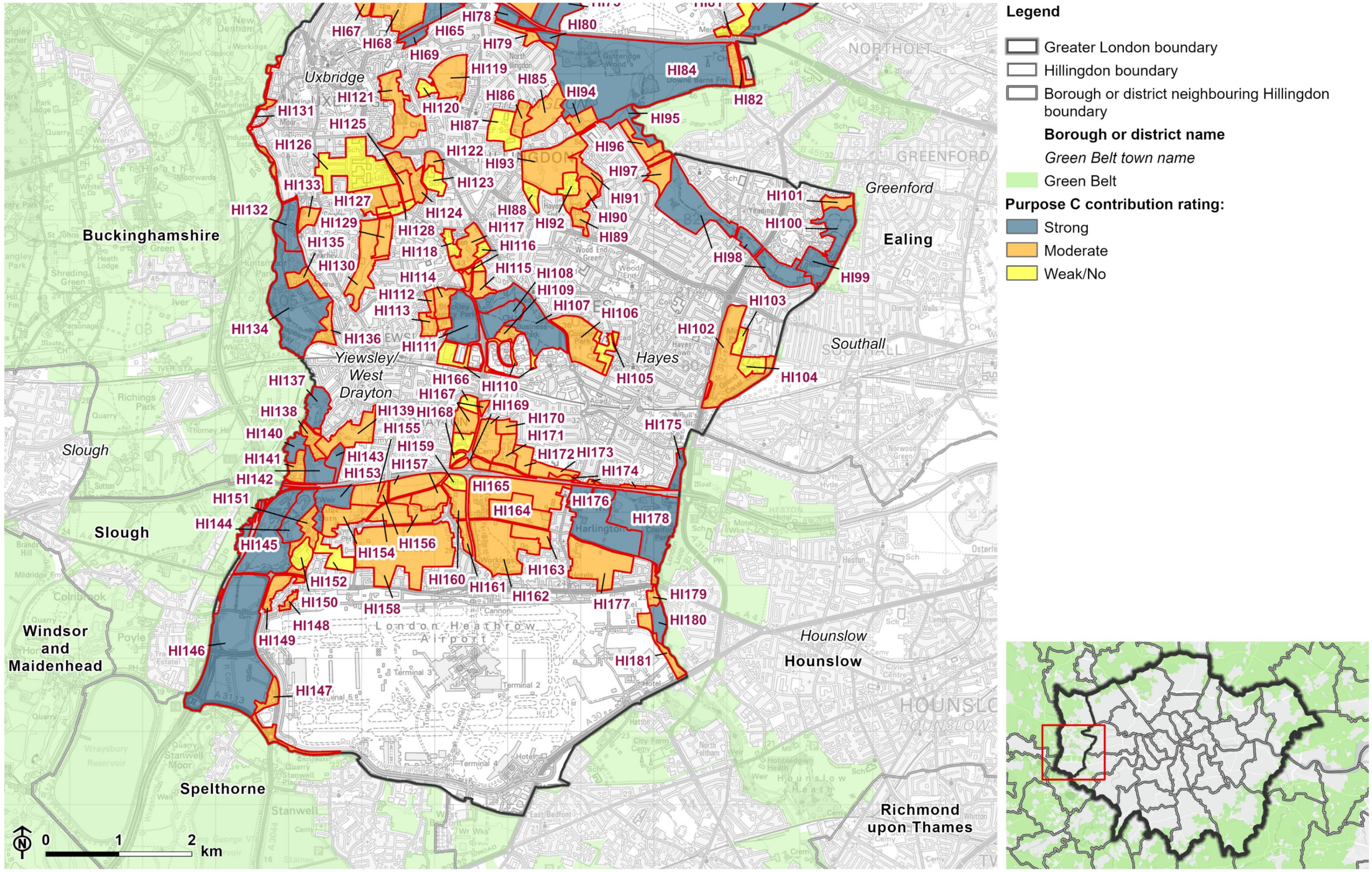
Figure 3.78: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment: South



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.338 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to 11 settlements large enough to be considered towns in Green Belt terms – Gerrards Cross/Chalfont Saint Peter, Greenford, Hayes, Northolt, Northwood, Rickmansworth, Ruislip, Slough, Southall, West Dayton/Yiewsley, and Uxbridge.

3.339 Hayes has a historic core protected by **Hayes Village Conservation Area**, although is located deep within the urban area and consequently has no notable physical or visual relationship with the open countryside designated as Green Belt. The key views identified in the Hayes Village Conservation Area Appraisal (2015) are internally focussed on trees, open spaces and surviving historic field boundaries and St Mary's Church. Northolt is located within the London Brough of Ealing to the east of Hillingdon. The historic parts of the town, protected by **Northolt Village Green Conservation Area**, have limited to no physical and visual connection with Green Belt land within Hillingdon Borough due to intervening built form. Slough is located in Slough Unitary Authority to the west of Hillingdon Borough, at such a distance that Green Belt land within the borough makes little to no contribution to its setting and special character.

3.340 Greenford and Southall are not considered to be historic towns as they lack a 'historic urban core' (intermediate type within the 'urban settlement' broad type) identified within the GLHLC (2021) and are not protected by conservation area designations.

3.341 Gerrards Cross/Chalfont Saint Peter are a significant distance to the west of the borough's Green Belt land beyond the M25/M40 and the wider Colne Valley to the west of the borough.

3.342 However, the following towns have conservations areas which are located in relatively close proximity to Green Belt land:

- **Northwood Town Centre, Green Lane Conservation** Area covers the commercial core of the Northwood area, centred on the junction of Green Lane and Maxwell Road and characterised by its late Victorian and Edwardian architecture. The area lies in proximity to Green Belt land at Norwood Golf Course to the south-east, separated from it by development along Rickmansworth Road. Despite its proximity, views within the area are generally internal and focussed along roads as noted within the Northwood Town Centre, Green Lane Conservation Area Appraisal (2019). A relevant view of note is that

looking south-west from the top of Maxwell Road, although due to the curving layout of the road there is little visual relationship with the Green Belt land at Northwood Golf Course. Two other conservation areas lie immediately adjacent to Northwood Town Centre: **The Glen, Northwood Conservation Area** to the west and **Northwood, Frithwood Conservation Area** to the north-east. These areas protect later estate development which have no physical or visual relationship with the nearby Green Belt land due to intervening development.

- **Rickmansworth Conservation Area** covers the historic core of the town located at confluence of three rivers: Colne, Chess and Gade within the neighbouring Three Rivers District. The river valley landscapes, which are designated as Green Belt, are an important aspect of the town's special character and setting. However, the valley of the River Colne Valley that lies within the Hillingdon Borough Green Belt is located some distance to the south-west of the historic core and therefore has limited visual relationship with the historic core.
- The GLHLC (2024) identifies an area of 'historic urban core' within Ruislip. This area is also covered by **Ruislip Village Conservation Area** which comprises the medieval village core of Ruislip, including (Ruislip) Manor Farm, St. Martin's Church and the buildings immediately surrounding them. The Ruislip Village Conservation Area Appraisal (2010) notes that the area 'has a green and open setting' and that it is 'surrounded by Green Belt to the north, east and west'. It makes specific mention of Park Wood which lies to the north of the town. The key local views identified in the appraisal are all internally focussed along roads and towards focal points. **Ruislip, Manor Way Conservation Area** is located in proximity to the east of Rusilip Village, although this covers an area of 20th century estate development that has little to no physical or visual connection with the wider surrounding Green Belt.
- The GLHLC (2021) identifies two areas of 'historic urban core' within West Drayton. This area is also covered by the **West Drayton Green Conservation Area** which comprises the old village centre of West Drayton. Part of the conservation area lies within the Green Belt, including The Closes and St Georges Meadows. These green open spaces directly abut the historic core of the settlement to the south contributing to its remnant historic character. At the time of writing there was no published conservation area appraisal for West Drayton Green.
- **Old Uxbridge/Windsor Street Conservation Area** and **Rockingham Bridge Conservation Area** lie within or close to the historic core of Uxbridge, but are largely surrounded by later development which limits any physical or visual relationship with the surround Green Belt in Hillingdon. Whilst the **Uxbridge**

Moor Conservation Area lies adjacent to a small area of Green Belt land within Hillingdon Borough along the valley of the River Colne, its focus is mainly on the Grand Union Canal with surrounding later built form limiting any physical or visual connection with surrounding Green Belt land.

3.343 There are several 'Areas of Special Local Character' (ASLC) within the borough, which are non-designated local heritage assets that have a character and identity local residents value and the council wishes to preserve or enhance. The following ASLC are identified within towns:

- Northwood: Dene Road; Old Northwood; Gatehill Farm Estate; Hillside, Northwood Hills; and Copsewood Estate.
- Ruislip: Moat Drive and Midcroft.
- Hayes: Central Avenue.
- Uxbridge: North Uxbridge.
- West Dayton/Yiewsley: Garden City, West Drayton.

3.344 There are no published evidence base documents relating to the ASLC. However, the areas identified above comprise later townscapes (e.g. suburban residential developments) that have little relationship with surrounding Green Belt land.

3.345 The Grade II **Stockley Park Registered Park and Garden** is located in the south of Hillingdon, predominantly within Green Belt land between the towns of Hayes and Yiewsley. The park's listing notes that the historic interest relates to 'a pioneering design from the early phase of business park development in England' and 'a skilled reuse of highly contaminated land'. There are no documented connection between the designated area and the setting and special character of neighbouring historic towns.

3.346 Based on the above, the following areas of the Green Belt land within Hillingdon are considered to make a contribution to Green Belt Purpose D:

- Green open spaces - The Closes and St Georges Meadows – which directly abut the historic core of West Drayton and form an important part of its setting and remnant rural character, make a strong contribution to its setting and special character (HI139).
- Wooded areas to the north of Ruislip form a wider green and open setting to the town and make a moderate contribution to its setting and special character (parcels HI143, HI144 and HI147).

- Farmland to the west of Ruislip forms a wider green and open setting to the town and makes a moderate contribution to its setting and special character (parcels HI155 and HI157).

3.347 Other areas of the borough are considered to make a weak or no contribution to Purpose D. It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.348 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.349 Figures 3.79 and 3.80 illustrate the variations in contribution to Purpose D across Hillingdon.

Figure 3.79: Contribution to Purpose D – Preserve the setting and special character of historic towns: North

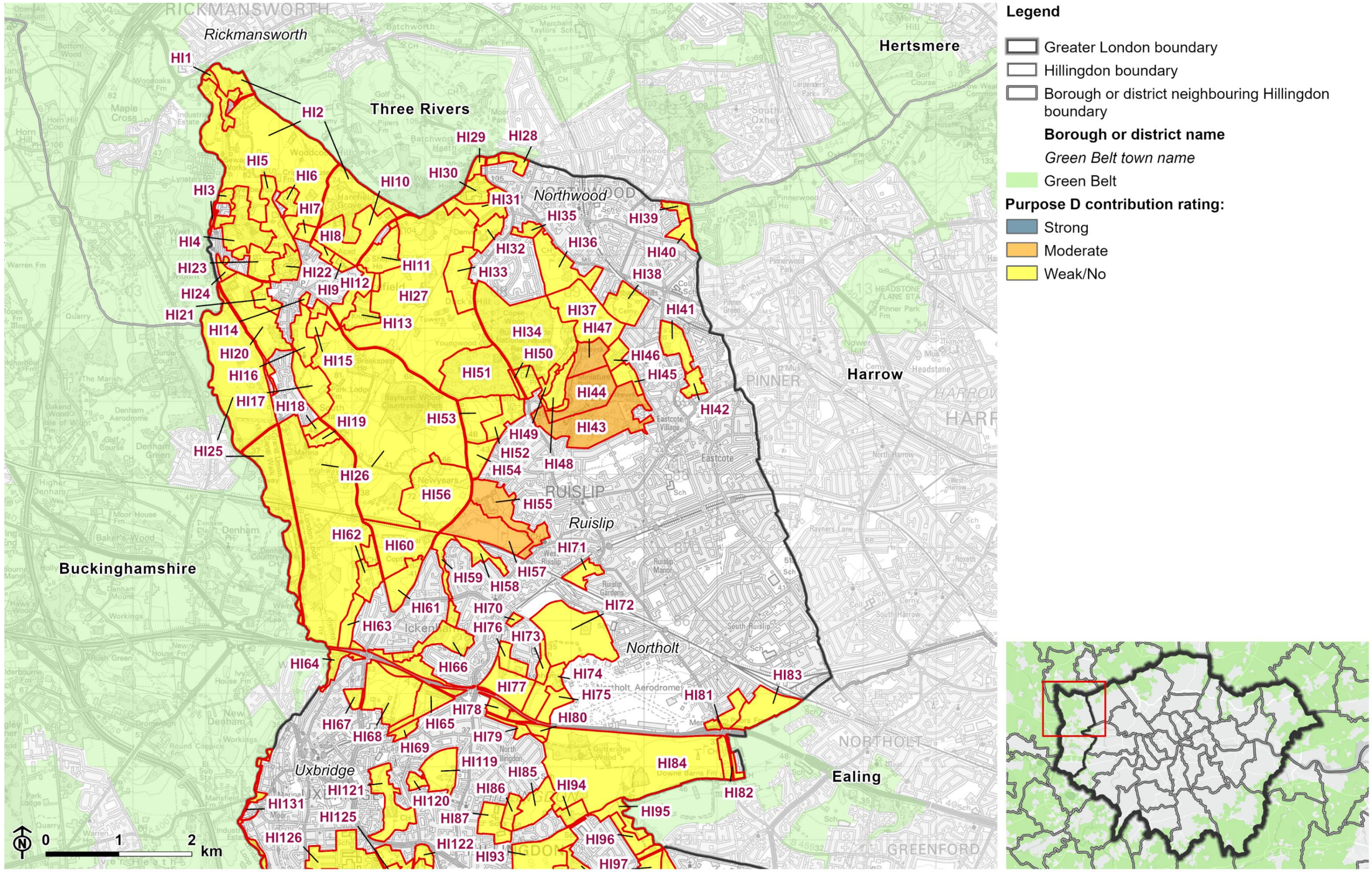

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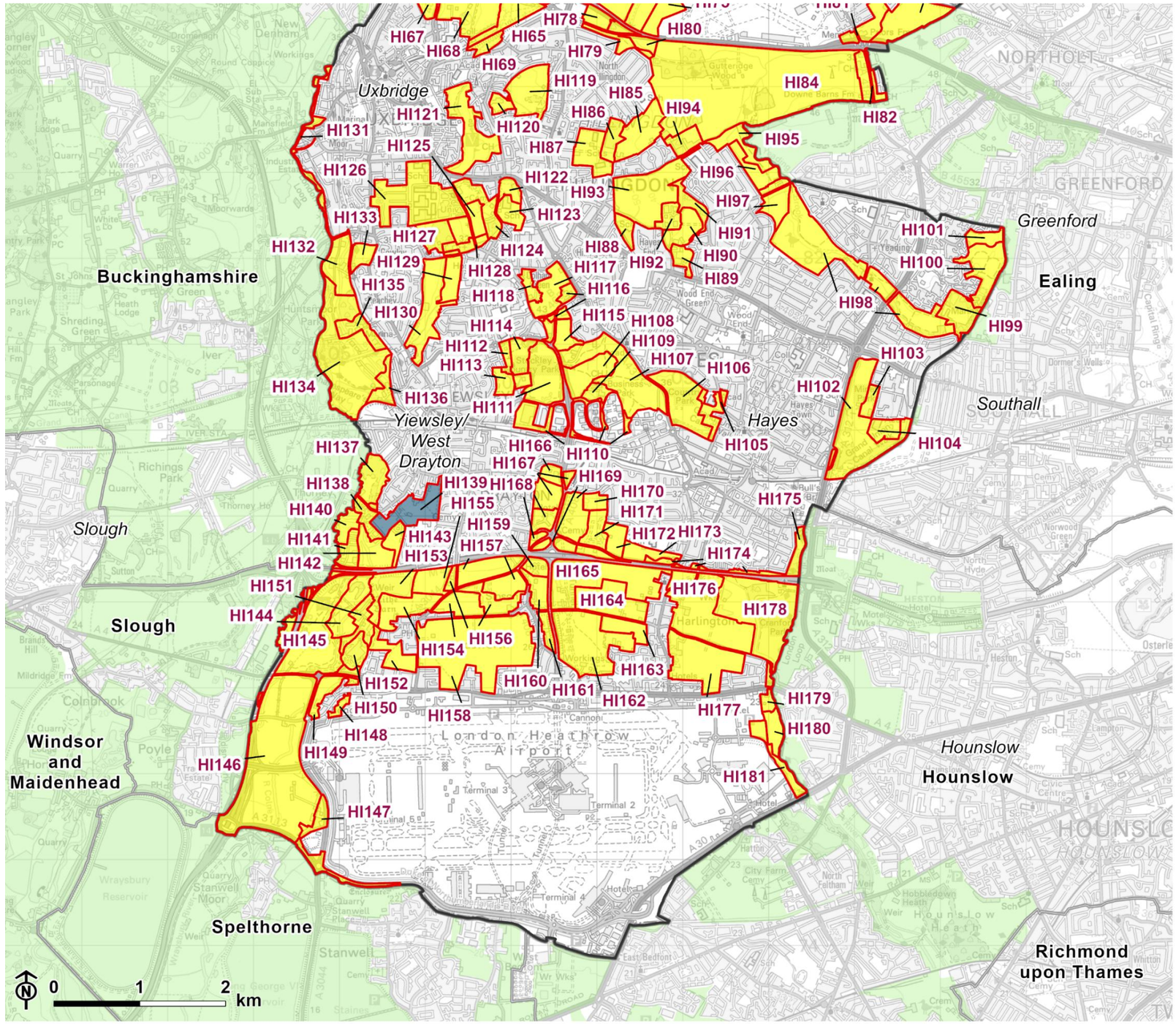
Figure 3.80: Contribution to Purpose D – Preserve the setting and special character of historic towns: South



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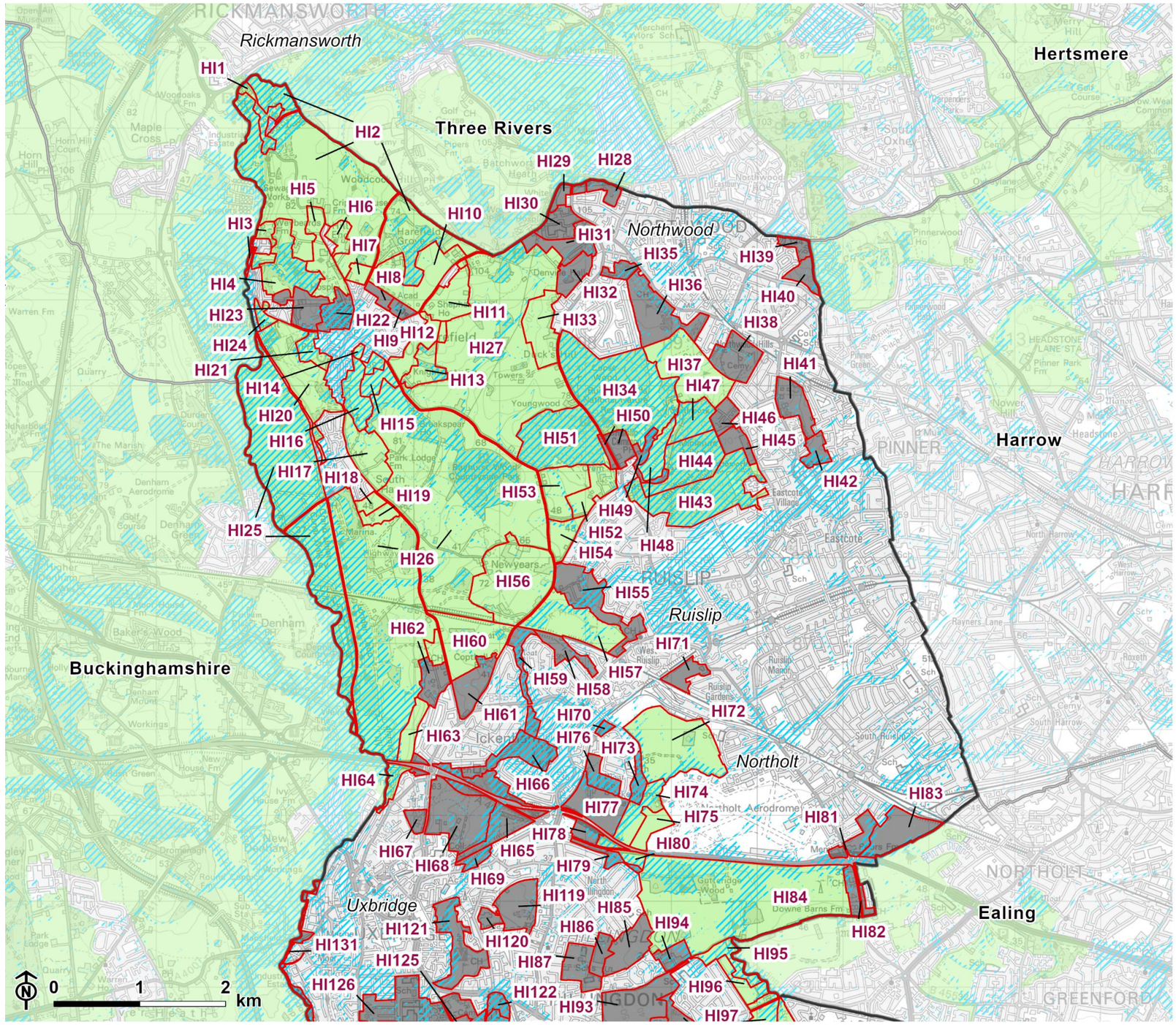
Potential grey belt in the London Borough of Hillingdon

3.350 Having regard to the definition set out in the NPPF, the following areas of Hillingdon are defined as having potential for definition as grey belt land subject to further work by the borough:

- Land on the northern and western edges of Harefield (parcels HI18, HI19, HI22 and HI23).
- Land on the north-western, eastern and southern edges of Northwood (parcels HI28-HI32, HI35, HI36 and HI38-HI40).
- Land contained within and on the western edge of Pinner/Eastcote Village (parcels HI41, HI42, HI45 and HI46).
- Land on the northern and western edge of Ruislip (parcels HI49, HI50 and HI55).
- Land on the north-western edge of Ickenham and western edge of Uxbridge (parcels HI61 and HI62).
- Land largely contained by the urban areas of Ickenham, Uxbridge, Northolt and Hillingdon (parcels HI58, HI59, HI65-HI71, HI73, HI76-HI79 and HI85-HI94).
- Urbanised land to the south east of Northolt (parcels HI81-HI83).
- Land largely contained and urbanised by the urban areas of Uxbridge and Hillingdon (parcels HI111-HI130).
- Land on the western edge of Uxbridge (parcels HI132, HI133, HI135 and HI136).
- Land largely contained by the urban areas of Hayes and Yiewsley (parcels HI105-107, HI109, HI110, and HI112-HI115).
- Land largely contained by the urban areas of Hayes, Hillingdon, Southall and Greenford (parcels HI99-101 and HI102-HI104).
- Land on the western edge of West Drayton and Heathrow Airport (parcels HI137-139, HI141-HI143 and HI148-151).
- Land largely contained by the urban areas of Hayes, West Drayton, Cranford and Heathrow Airport (parcels HI152, HI158, HI159, HI161-164, HI166-HI175 and HI177).

3.351 Figures 3.81 and 3.82 illustrate the area potentially suitable for definition as grey belt land within Hillingdon.

Figure 3.81: Green Belt land potentially suitable for definition as grey belt land: North



Legend

- Greater London boundary
- Hillingdon boundary
- Borough or district neighbouring Hillingdon boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets

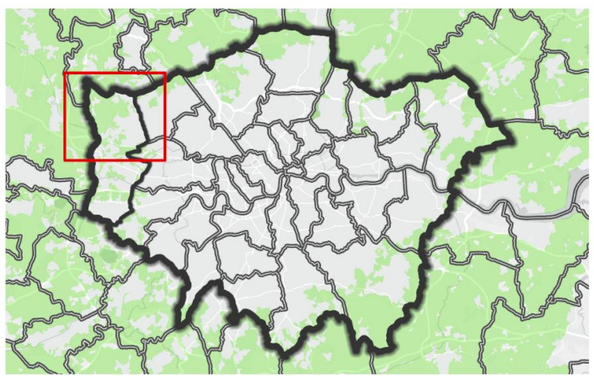


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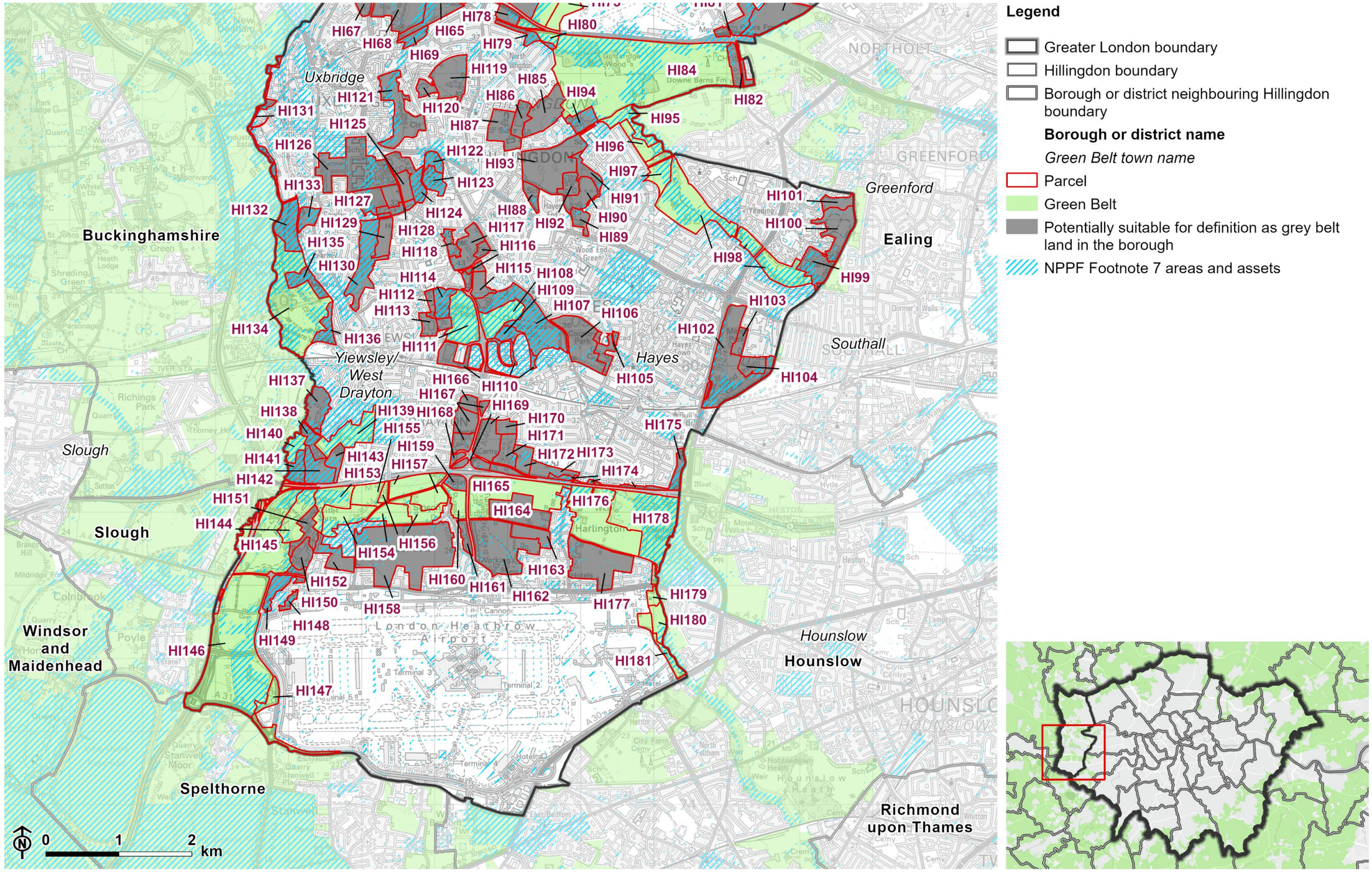
Figure 3.82: Green Belt land potentially suitable for definition as grey belt land: South



Legend

- Greater London boundary
- Hillingdon boundary
- Borough or district neighbouring Hillingdon boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets

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Highest and lowest contributing Green Belt land

3.352 The majority of Green Belt land in Hillingdon makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include the open land:

- North-west of the borough, north and west of Ruislip and Ickenham and west and south-west of Northwood (parcels HI1-7, HI10-HI21, HI24-HI27, HI33, HI34, HI37, HI43, HI44, HI47, HI48, HI51-HI54, HI56, HI57, HI60, HI63 and HI64). These areas make a strong contribution to Purpose A, with some also making a contribution to Purpose B (parcels HI34, HI44, HI47, HI49, HI56 and HI57) and Purpose C (parcels HI1-HI6, HI10-HI13, HI15-HI17, HI19-HI21, HI24-HI27, HI33, HI34, HI37, HI43, HI44, HI47, HI48, HI51, HI53, HI54, HI56, HI57, HI60, HI63 and HI64).
- Between Ruislip, Ickenham and Northolt (H172), land makes a strong contribution to purposes A and C.
- Within the gap between Hillingdon / Hayes and Ruislip/Northolt (parcels HI174, HI175, HI180, HI84, HI195 and HI196), land make a strong contribution to Purpose B. Most of these also make a strong contribution to Purpose A (parcels HI174, HI175, HI180 and HI184) and to Purpose C (parcels HI174, HI175, HI180, HI184 and HI195).
- Between Hayes and West Drayton/Yiewsley (parcels HI108 and HI111), land makes a strong contribution to Purpose B, and along with parcel HI107, a strong contribution to Purpose C.
- Between Hayes and Greenford in the neighbouring London Borough of Ealing (parcels HI195-H198), land makes a strong contribution to Purpose B, with parcel HI198, along with HI19, HI99 and HI100, also making a strong contribution to Purpose C.
- West of West Drayton/Yiewsley in a gap between it and Slough (HI134) makes a strong contribution to purposes A and B and, along with parcel HI132, a strong contribution to Purpose C.
- South-west of West Drayton and west of Heathrow Airport (parcels HI140 and HI144-HI147) land makes a strong contribution to Purpose A, with some also making a strong contribution to Purpose B (parcels HI144, HI145 and HI146)) and Purpose C (parcels HI140 and HI142-HI146). Parcel HI139 makes a strong contribution to Purpose D.

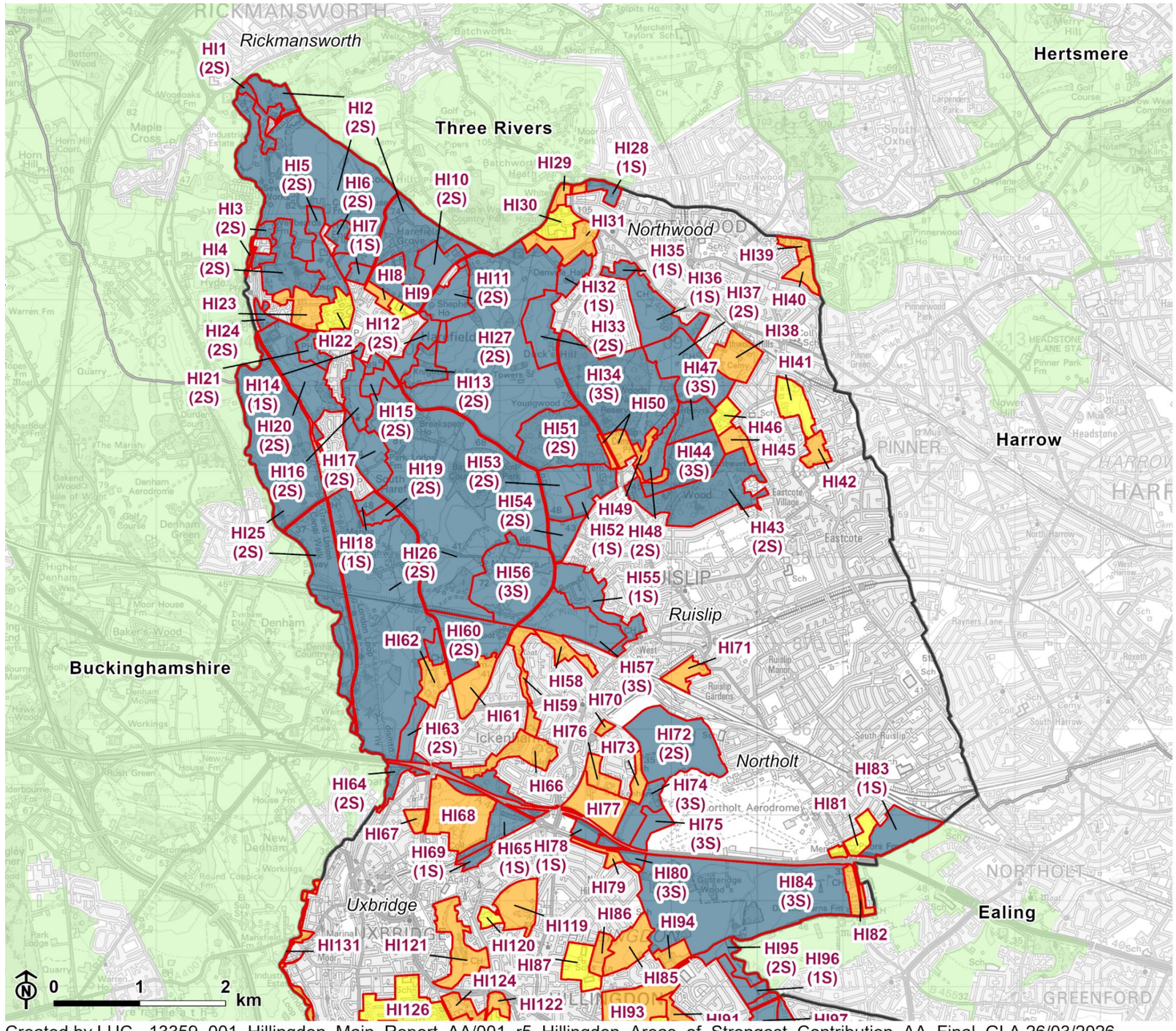
- Between Hounslow (via Cranford and Heathrow Airport) and West Drayton/Hayes and Feltham (parcels HI153-HI157, HI160, HI165, HI176 and HI178-HI181) land makes a strong contribution to Purpose B. Some parcels (parcels HI153, HI176, HI178 and HI180) also make a strong contribution to Purpose C, with parcel HI178 also making a strong contribution to Purpose A.

3.353 Green Belt land within Hillingdon that contributes the least to the Green Belt purposes tends to be significantly developed and urbanised (parcels HI9, HI22, HI30, HI46, HI87, HI88, HI92, HI109, HI110, HI116, HI120, HI123, HI126, HI128, HI150, HI159, HI166 and HI168), or notably contained pockets of Green Belt that are predominately associated with urban areas and largely isolated from the wider open countryside (parcels HI41, HI81, HI103-HI105, HI118 and HI152). These areas make no more than a weak/no contribution to the Green Belt purposes.

3.354 Figures 3.83 and 3.84 illustrate the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

3.355 The emerging plans to expand London Heathrow Airport to accommodate a third runway have not been considered in the assessment of Green Belt land in the London Borough of Hillingdon, given that the full details of this national infrastructure project have yet to be finalised and consented.

Figure 3.83: Highest contribution to NPPF Green Belt purposes: North



Legend

- Greater London boundary
- Hillingdon boundary
- Borough or district neighbouring Hillingdon boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.

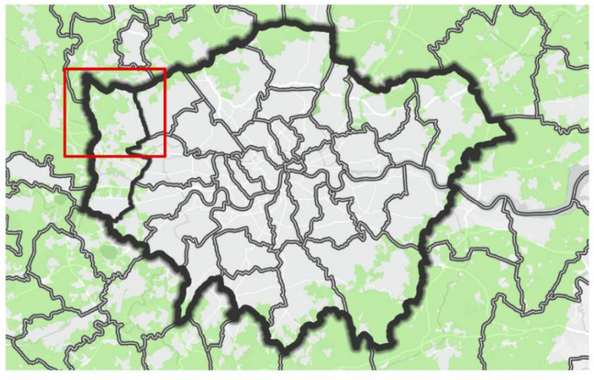


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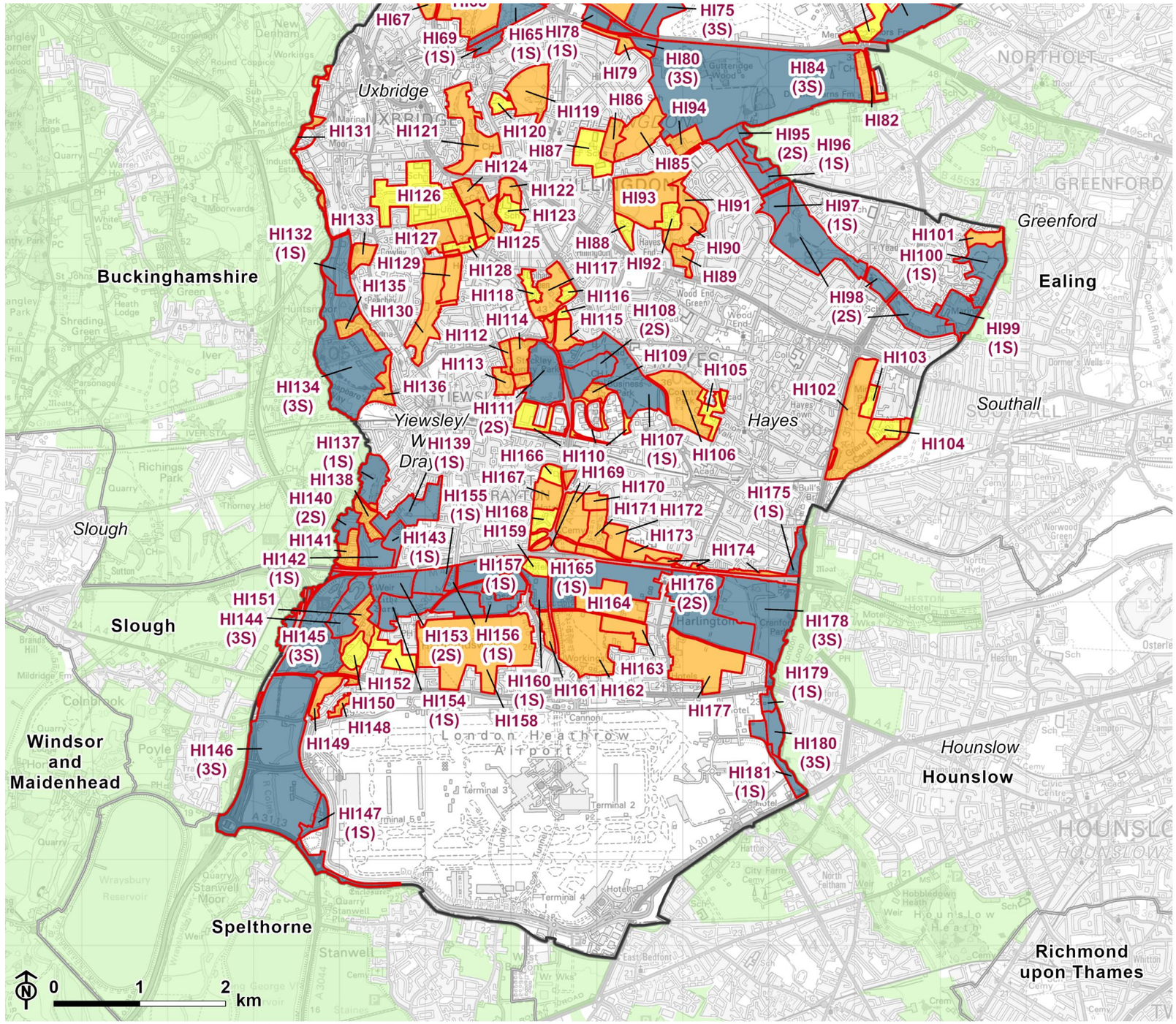
Figure 3.84: Highest contribution to NPPF Green Belt purposes: South



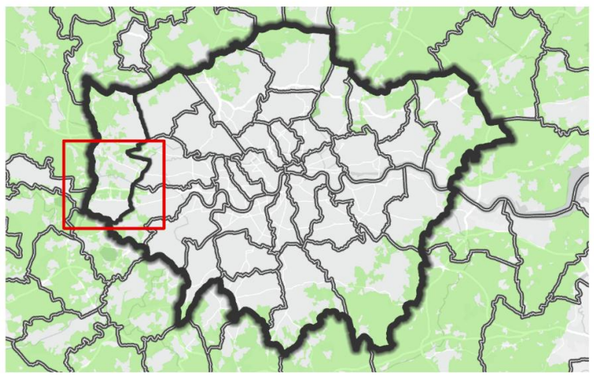
Legend

- Greater London boundary
- Hillingdon boundary
- Borough or district neighbouring Hillingdon boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.356 In light of the scale and contiguity of Green Belt land in Hillingdon and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with Harefield and Poyle/Colnbrook/Slough would have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Northwood and Ruislip.
  - Northwood/Ruislip/Uxbridge and Rickmansworth (via Harefield)
  - Northwood/Ruislip/Uxbridge and Gerrards Cross (via Denham and Harefield).
  - Hayes/Hounslow and Yiewsley/West Drayton (via Heathrow Airport) and Slough (via Colnbrook and Poyle).
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release or development of open land that forms an important part of the setting and special character of West Drayton would likely have a fundamental impact on Purpose D.

Hounslow

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.357 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

3.358 The areas that make a strong contribution are the least urbanised, open and often well treed parcels (parcels HO51, HO52, HO55-HO58, HO61, HO62, HO64, HO65, HO69, HO70 and HO72) in the far south west and south of the borough

separating Feltham from Ashford/Sunbury-on-Thames (within the neighbouring Spelthorne District). The development of these areas would have a notable incongruous impact on the urban pattern by significantly narrowing the gap or merging Greater London with Ashford/Sunbury-on-Thames, significantly extending the combined sprawling influence to the west.

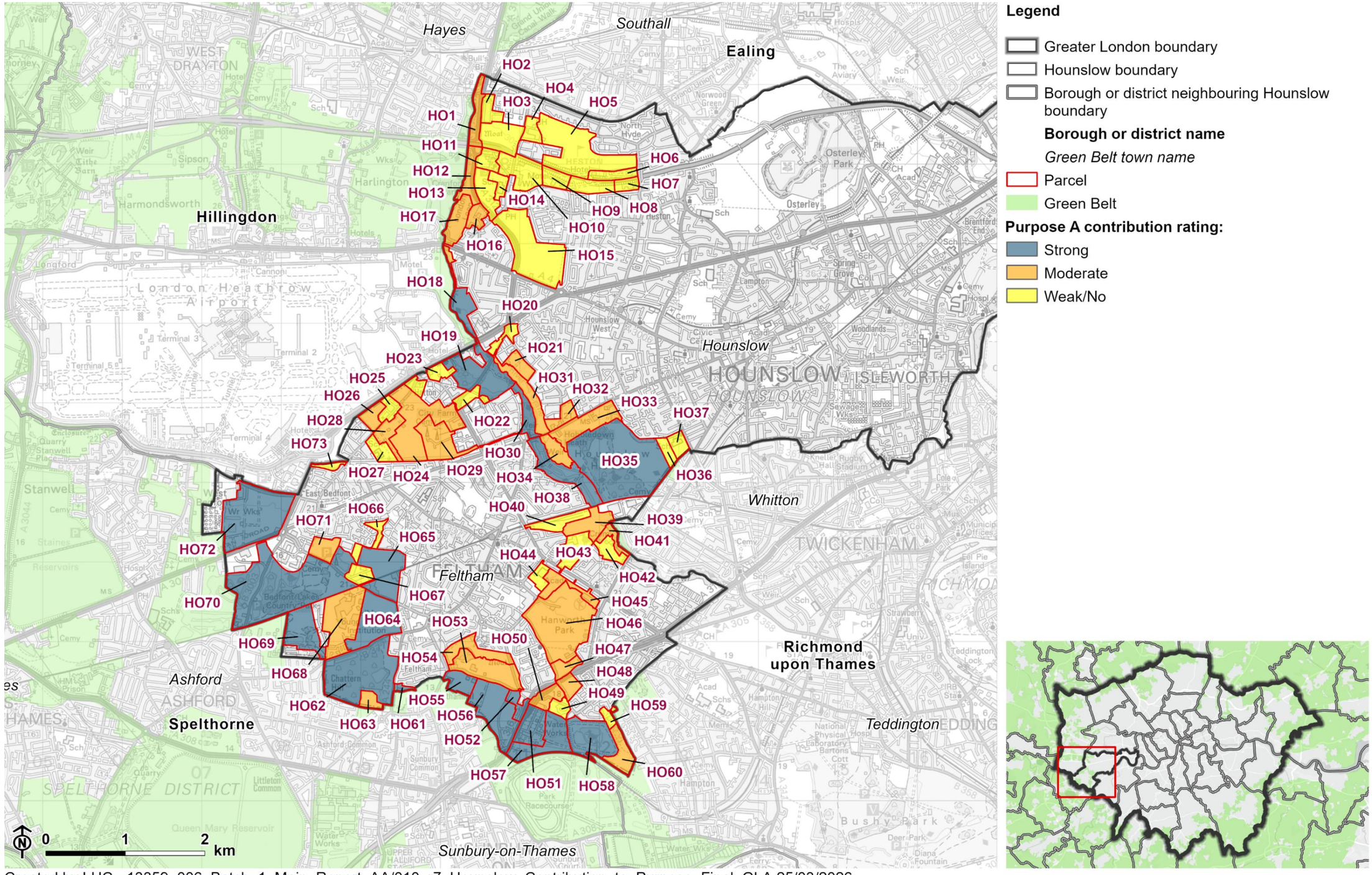
3.359 Hounslow Heath (HO35) and the well treed banks of the River Crane (parcels HO18, HO19, HO30, HO38 and HO39) to the east and north east of Feltham, separating Feltham from Hounslow and Whitton and Feltham from Teddington and Whitton (via Hanworth) and Hounslow from Ashford (via Heathrow Airport) make a strong contribution to this purpose. As the largest open space/corridor within the urban area, its mature trees clearly separate it from the surrounding urban area such that development within it would have a notable sprawling influence, increasing the combined sprawling connection between Feltham, Hounslow, Teddington, Whitton and Ashford (via Heathrow Airport).

3.360 Green Belt land that is particularly developed (parcels HO2, HO4, HO7, HO9, HO11, HO14, HO25, HO27, HO37, HO44, HO59 and HO67) or contained and urbanised by the surrounding urban area (parcels HO20, HO22, HO23, HO66 and HO73) make a weak/no contribution to Purpose A.

3.361 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more contained by the large built-up area but are still generally open and sufficiently distinct from large built up area that development would have some sprawling influence.

3.362 Figure 3.85 illustrates the variations in contribution to Purpose A across Hounslow.

Figure 3.85: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



Legend

- Greater London boundary
- Hounslow boundary
- Borough or district neighbouring Hounslow boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose A contribution rating:

- Strong
- Moderate
- Weak/No

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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.363 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.364 The areas that make a strong contribution are the least urbanised, open and often well treed parcels (parcels HO51, HO52, HO55-HO58, HO61, HO62, HO64, HO65, HO69, HO70 and HO72) in the far south west and south of the borough separating Feltham from Ashford/Sunbury-on-Thames (within the neighbouring Spelthorne District). These areas form a substantial part of the remaining gap and play a key role in maintaining what remains of the visual separation between the towns.

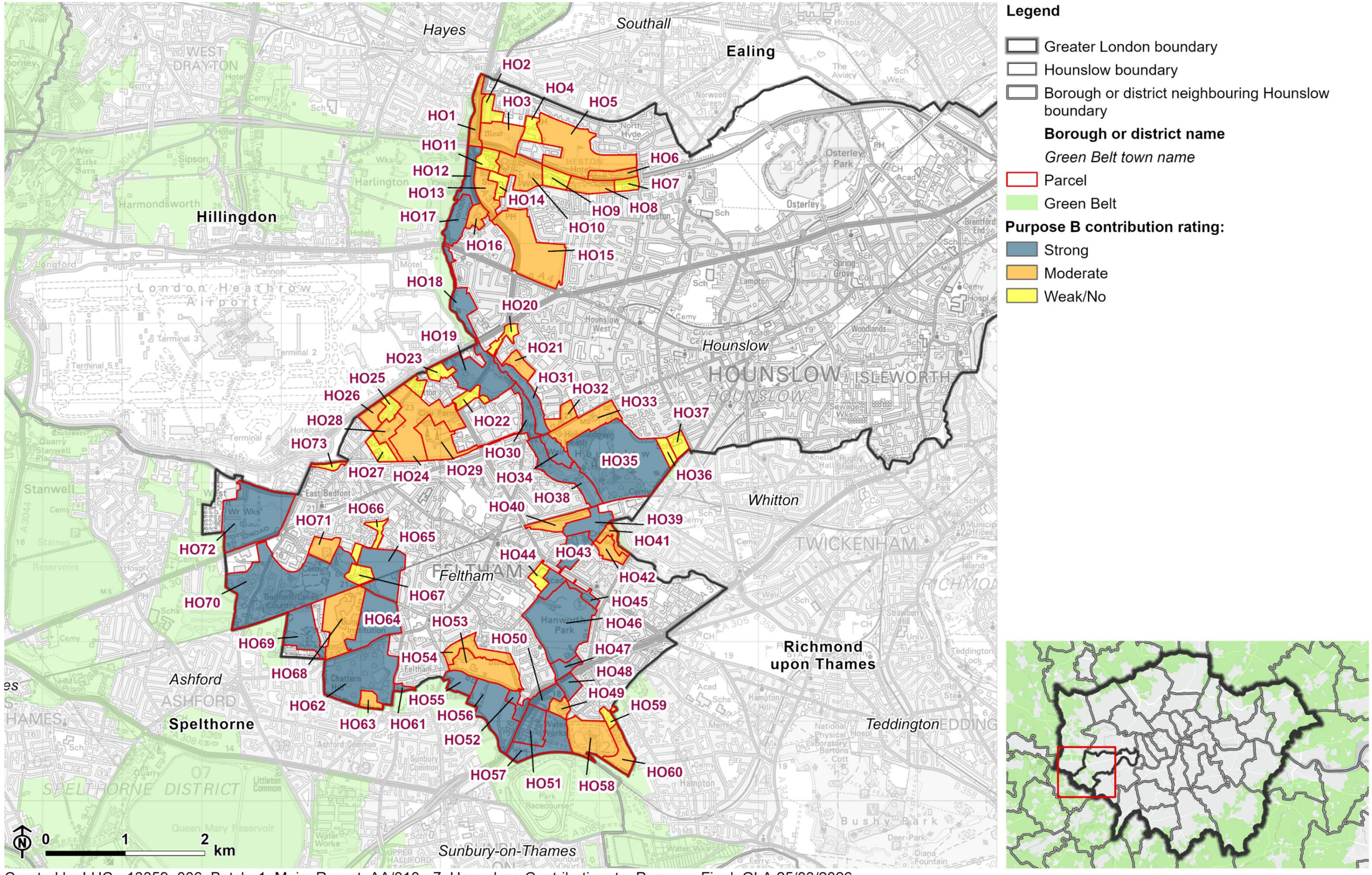
3.365 The well treed banks of the River Crane to the east and north east of Feltham, narrowly separate Feltham from Hounslow and Whitton and Feltham from Teddington and Whitton (via Hanworth) and Hounslow from Ashford (via Heathrow Airport). The parcels in these narrow gaps (parcels HO18, HO19, HO30, HO38 and HO39) make a strong contribution to this purpose. Similarly, Hounslow Heath (HO35) and Hanworth Park (HO46) represent the largest open spaces within the urban area, separating Feltham from Hounslow and Whitton and Feltham from Teddington and Whitton (via Hanworth), respectively. These larger well treed open spaces make a strong contribution to this purpose as the most substantial and visually separating parts of their respective gaps between towns.

3.366 Green Belt land that is particularly developed (parcels HO2, HO4, HO7, HO9, HO11, HO14, HO25, HO27, HO37, HO44, HO59 and HO67) or contained and urbanised by the surrounding urban area (parcels HO20, HO22, HO23, HO66 and HO73) make a weak/no contribution to Purpose B.

3.367 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more contained by urban areas but are still generally open and sufficiently distinct that they still play some separating role between neighbouring towns.

3.368 Figure 3.86 illustrates the variations in contribution to Purpose B across Hounslow.

Figure 3.86: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.369 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

3.370 The areas of the borough that comprise open countryside that has a strong sense of separation from urban areas and is not subject to any substantial urbanising influence within the Green Belt make a strong contribution to this purpose. Notable locations include:

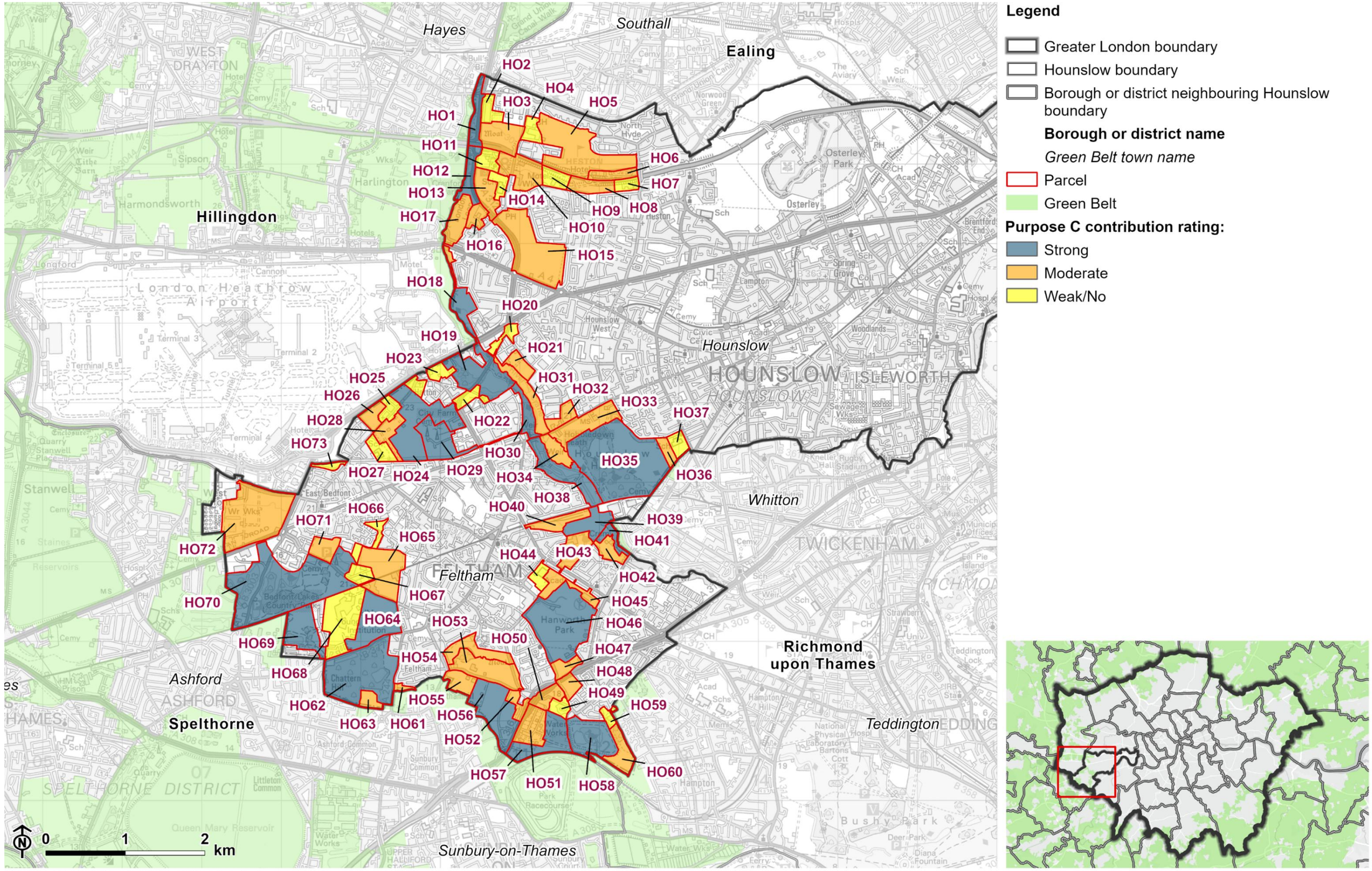
- The open and often well treed parcels (parcels HO56, HO57, HO58, HO62, HO64, HO69 and HO70) in the far south west and south of the borough.
- Hounslow Heath (HO35) and Hanworth Park (HO46).
- The well treed banks of the River Crane (parcels HO1, HO12, HO18, HO19, HO30, HO38 and HO39).
- The open fields and scrubland south of Hatton and north of Feltham and the Duke of Northumberland's River (parcels HO24 and HO29).

3.371 Green Belt land that is particularly developed (parcels HO2, HO4, HO7, HO9, HO11, HO14, HO25, HO27, HO37, HO44, HO59 and HO67) or contained and urbanised by the surrounding urban area (parcels HO20, HO22, HO23, HO66 and HO73) make a weak/no contribution to Purpose C.

3.372 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more contained by urban areas but are still generally open and sufficiently distinct that development would represent encroachment into the countryside.

3.373 Figure 3.87 illustrates the variations in contribution to Purpose C across Hounslow.

Figure 3.87: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.374 A review of relevant historic designations within and adjacent to the borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the borough contains and lies adjacent to nine settlements large enough to be considered towns in Green Belt terms: Ashford, Hayes, Hounslow, Feltham, Southall, Staines-upon-Thames, Sunbury-on-Thames, Teddington and Whitton.

3.375 Within these urban areas there are a number of conservation areas, the majority of which are located deep within the large built-up urban areas and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt. These areas tend to be focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points). Some other conservation areas protect formerly separate village centres (e.g. Heston Village, Cranford Village and Bedfont Green) which, whilst now having been subsumed within the wider area of a town, have special interests relating to their remnant village character and are therefore not considered relevant to the setting and special character of a historic town.

3.376 Notable exceptions include conservations areas located within wider Green Belt town areas that lie adjacent to and/or include areas of Green Belt land, including Hanworth Park located in between Hanworth and Feltham. The **Hanworth Park Conservation Area** comprises the historic core of the settlement, including a 1950s estate and Hanworth Park (including the Grade II listed Hanworth Park House). As noted within the Hanworth Park Conservation Area Appraisal (2021) ‘the Hanworth Park area is an important part of Hanworth and Feltham’ and ‘the conservation area’s special architectural and historic interest is primarily found in the historic nature and associations of Tudor Court and the moat behind’, with other interest lying ‘in the openness of Hanworth Park, creating a rural setting for the former Rectory’. In regard to views, the appraisal notes that ‘the most important views in the conservation area are those across Hanworth Park towards landmark St George’s Church on its west side’.

3.377 The Hounslow Local Plan (2015) identifies several ‘Areas of Special Character’, which are of significant local value in terms of architectural, townscape and environmental quality. One Area of Special Character is identified within the town of Hounslow, which the Hounslow Urban Context and Character Study (2015) describes as relating to an area of intact Victorian townscape. The study for Hounslow (Chapter 3) makes no mention of any relationship between the important historic aspects of the town and the nearby Green Belt.

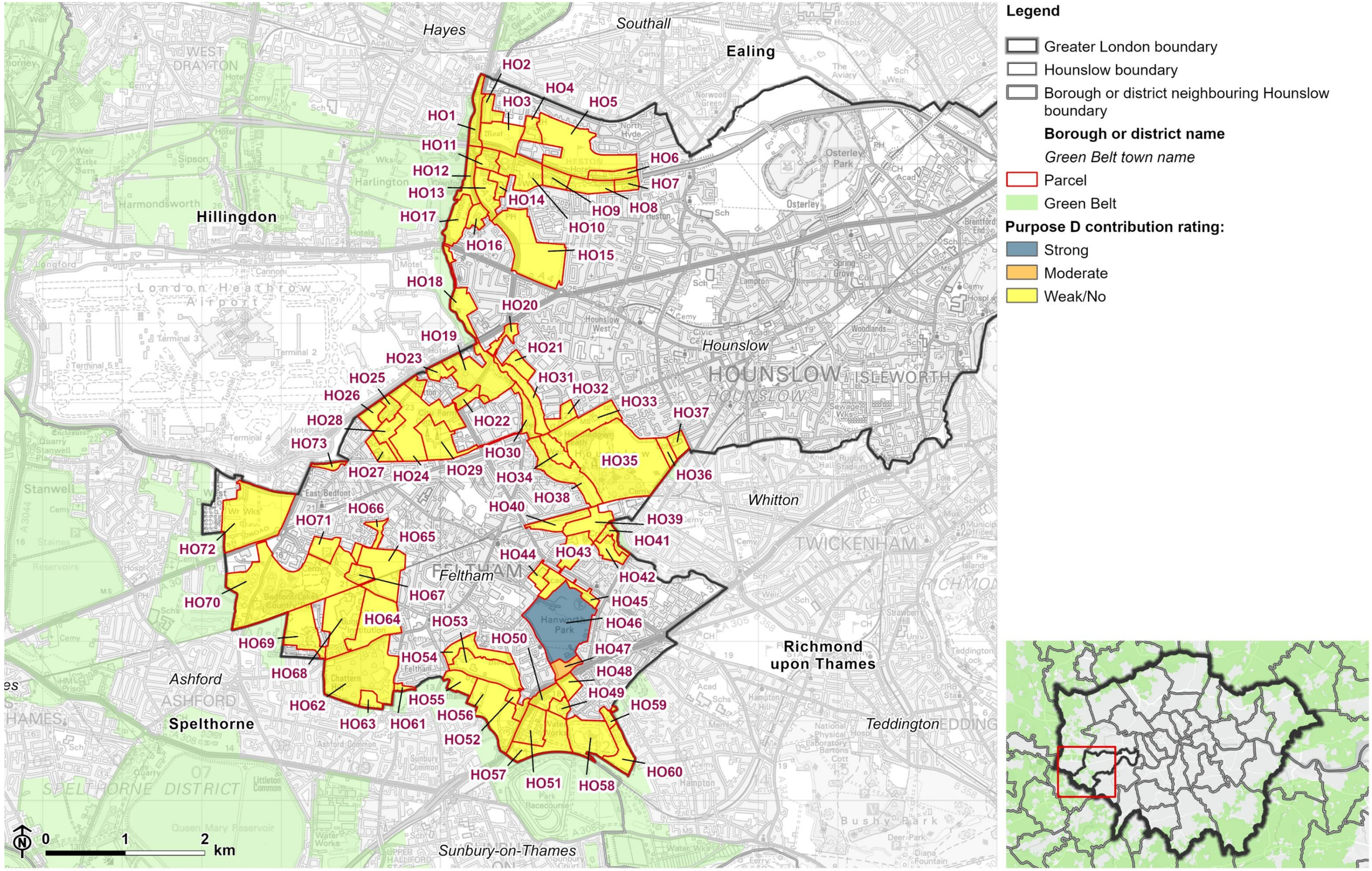
3.378 Based on the above, only one area of the Green Belt land within the borough is considered to make a strong contribution to Green Belt Purpose D is Hanworth Park (HO46). The land directly to the south comprised Rectory Meadow, Hanworth Villa Football Club and Hanworth Village Hall (HO47) is judged to make a more moderate contribution to Purpose D. This area has some wider visual links with historic parts of Hanworth (Feltham) to the north, including the landmark St George's Church.

3.379 It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.380 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.381 Figure 3.88 illustrates the variations in contribution to Purpose D across Hounslow.

Figure 3.88: Contribution to Purpose D – Preserve the setting and special character of historic towns



Legend

- Greater London boundary
- Hounslow boundary
- Borough or district neighbouring Hounslow boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose D contribution rating:

- Strong
- Moderate
- Weak/No

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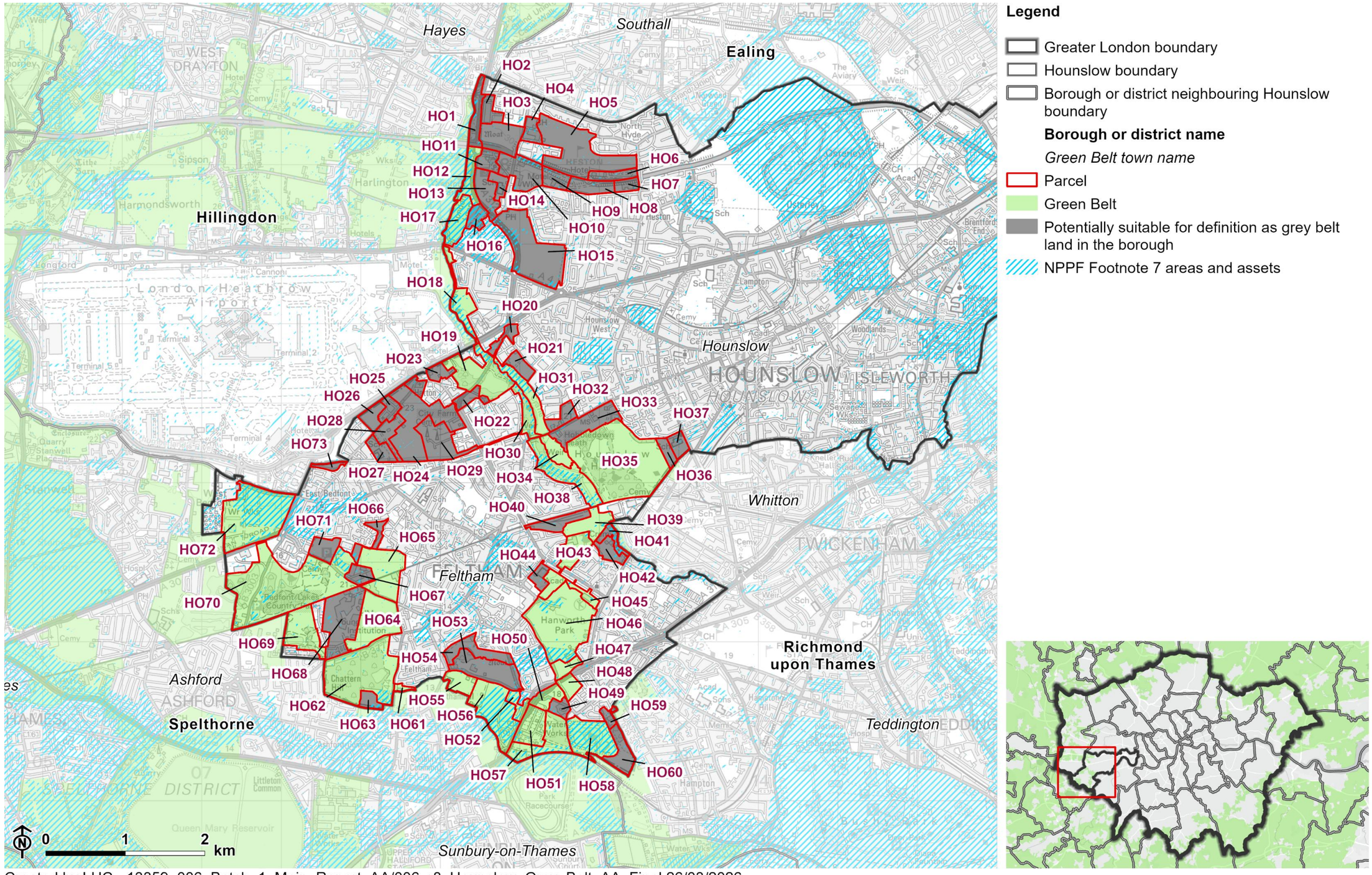
Potential grey belt in the London Borough of Hounslow

3.382 Having regard to the definition set out in the NPPF, the following areas of Hounslow are defined as having potential for definition as grey belt land subject to further work by the borough:

- All Green Belt land in the north of the borough north of the M4 and east of the A312 (parcels HO1-HO11, HO13-15) and the Cedars Primary School to the south west of the A312 (HO16).
- The more contained and urbanised Green Belt land east of the River Crane on the western and southern edges of Hounslow (parcels HO20, HO21, HO32 and HO33).
- The Green Belt land north of Feltham, in between Feltham, Hatton and Heathrow Airport (parcels HO22-HO28).
- The Heathland School and playing fields east of Hounslow Heath (parcels HO36 and HO37).
- The South West Middlesex Crematorium (parcels HO41 and HO42).
- The railway sidings east of Feltham (HO40).
- Springwest Academy and associated sports grounds (HO44).
- The Green Belt land south of Feltham north of Snakey Lane (parcels HO53 and HO54).
- The Green Belt land containing and heavily urbanised by the development along Dickenson Road and Nailhead Road (HO49).
- Hatherop Park, Twickenham Rugby and Football Club and St Richard's Church of England Primary School and playing fields (parcels HO59 and HO60).
- The Green Belt land directly north of the BP business park (HO63).
- Heathrow Logistics Park (HO67).
- Feltham Prison and the housing estate north of Ashford Road (HO68).
- The Green Belt land north of Bedfont Road and West of Bedfont Lake (HO71).
- The open space west of Sandy Drive and Southville Crescent (HO66).
- The isolated pockets of Green Belt land in between Longford River and the Duke of Northumberland River (HO73).

3.383 Figure 3.89 illustrates the area potentially suitable for definition as grey belt land within Hounslow.

Figure 3.89: Green Belt land potentially suitable for definition as grey belt land



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Highest and lowest contributing Green Belt land

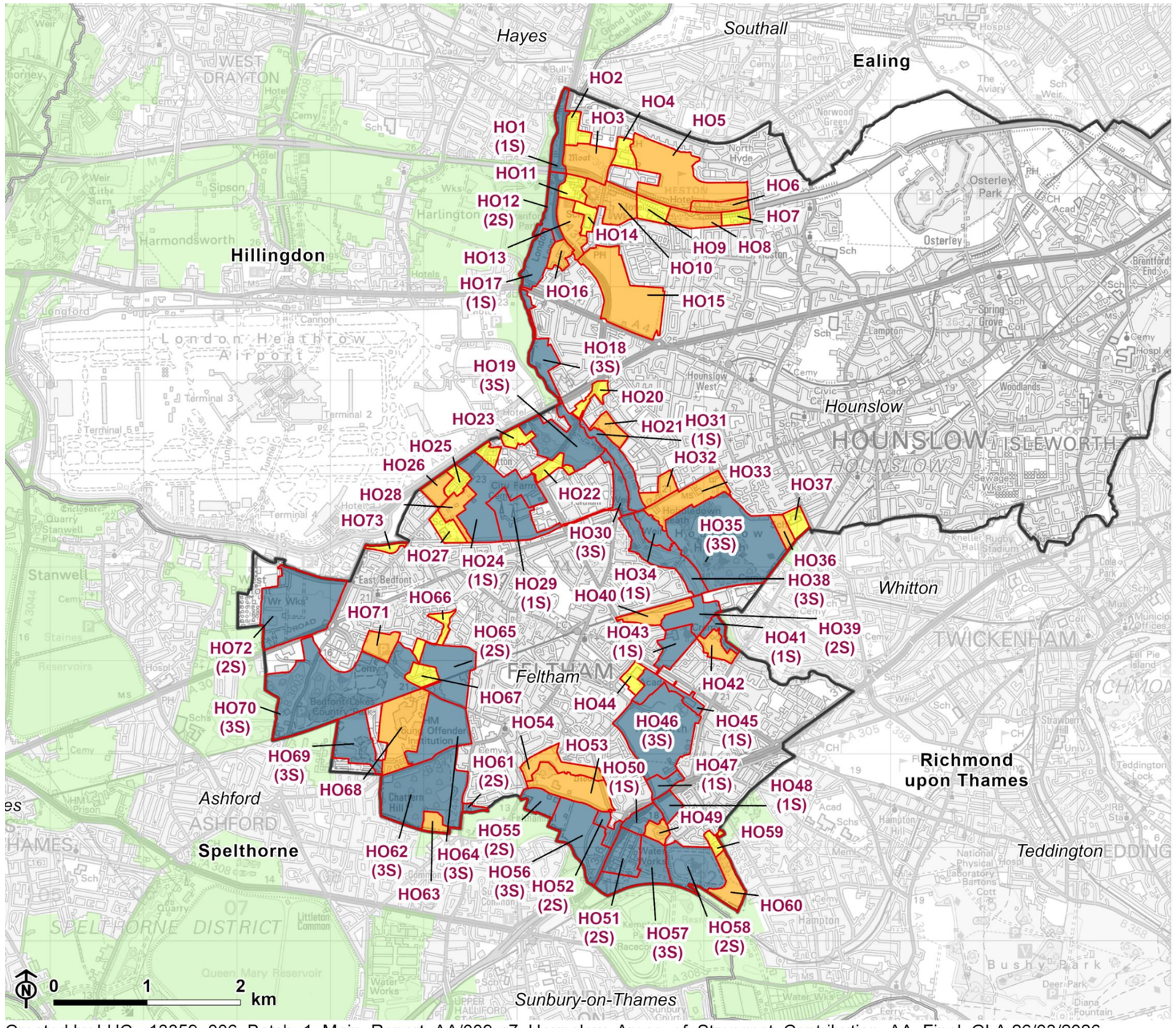
3.384 The majority of the Green Belt in Hounslow makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include:

- The least urbanised, open and often well treed parcels (parcels HO56, HO57, HO62, HO64, HO69 and HO70) in the far south west and south of the borough separating Feltham from Ashford/Sunbury-on-Thames (within the neighbouring Spelthorne District). These parcels make a strong contribution to purposes A, B and C. In addition, there are a number of other parcels in this area that make a strong contribution to purposes A and B (parcels HO51, HO52, HO55, HO58, HO61, HO65 and HO72).
- Hounslow Heath (HO35) and Hanworth Park (HO46) represent the largest open spaces within the urban area, separating Feltham from Hounslow and Whitton and Feltham from Teddington and Whitton (via Hanworth), respectively. These larger well treed open spaces make a strong contribution to purposes B and C, with Hounslow Heath (HO35) also make a strong contribution to Purpose A and Hanworth Park (HO46) also making a strong contribution to Purpose D.
- The well treed banks of the River Crane to the east and north east of Feltham, separating Feltham from Hounslow and Whitton and Feltham from Teddington and Whitton (via Hanworth) and Hounslow from Ashford (via Heathrow Airport). The highest contributing parcels (parcels HO18, HO19, HO30, HO38 and HO39) in this open river corridor make a strong contribution to purposes A, B and/or C.

3.385 The areas within Hounslow that contribute the least to the Green Belt purposes are already largely developed (parcels HO2, HO4, HO7, HO9, HO11, HO14, HO25, HO27, HO37, HO44, HO59 and HO67) or significantly contained and urbanised pockets of Green Belt that are associated with adjacent urban areas, do not sit in notable Green Belt gaps between towns and are largely isolated from the wider open countryside (parcels HO20, HO22, HO23, HO66 and HO73). All these parcels make no more than a weak/no contribution to the Green Belt purposes.

3.386 Figure 3.90 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.90: Highest contribution to NPPF Green Belt purposes



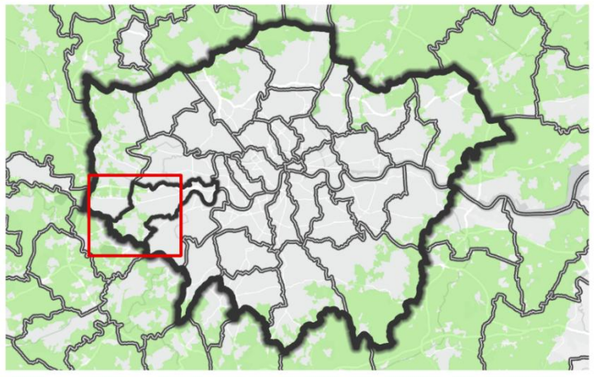
Legend

- Greater London boundary
- Hounslow boundary
- Borough or district neighbouring Hounslow boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.387 In light of the scale and contiguity of Green Belt land in Hounslow and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with Ashford/Sunbury-on-Thames and the wider contiguous and sprawling urban areas beyond would have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Feltham and Hounslow.
  - Feltham and Teddington/Whitton (via Hanworth).
  - Feltham and/or Teddington (via Hampton) with neighbouring Ashford/Sunbury-on-Thames.
- Release or development of the vast majority of all the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release or development of Hanworth Park (HO46) would likely have a fundamental impact on Purpose D.

Kingston

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.388 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

3.389 The vast majority of Green Belt land within Kingston is considered to make a strong contribution to Purpose A by virtue of the general openness, lack of containment and/or retention by physical features in reasonable proximity to the large built-up area (parcels KuT6-KuT10, KuT12, KuT14, KuT16, KuT18-KuT22 and KuT26). The development of these areas would have an incongruous impact on the

urban pattern by extending large built-up areas out into the open countryside beyond notable containing and retaining physical features, weakening the wider countryside and / or merging large built-up areas with smaller urban areas in the Green Belt such as Claygate, Chessington World of Adventure and Malden Rushett, increasing their combined sprawling influence.

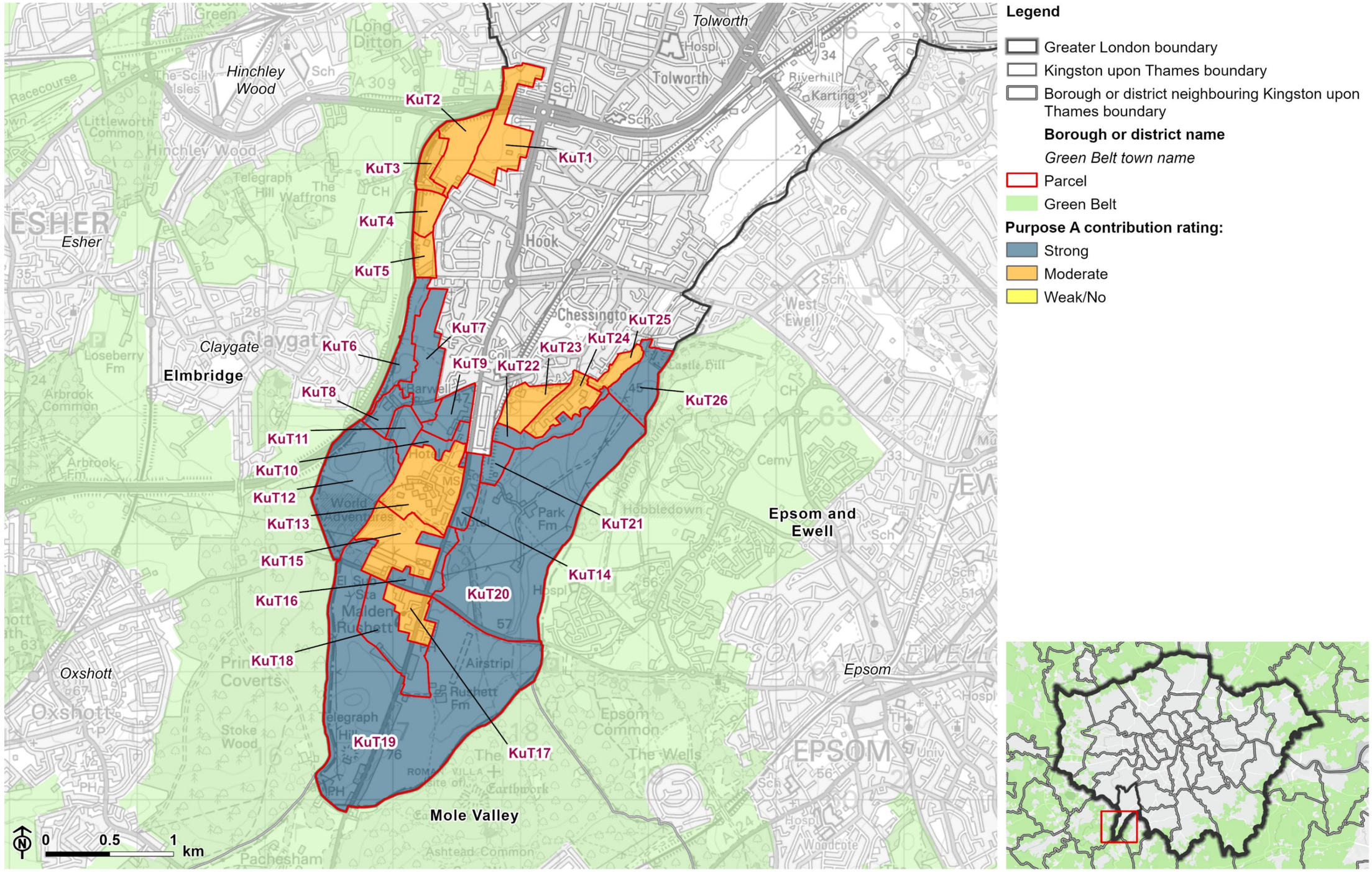
3.390 There are a number of areas that make a more moderate contribution to Purpose A including areas of washed over development and/or notable urbanising influences, such as the developed land north of Clayton Road (KuT3), Lovelace Primary School (KuT5), the residential development along Green Lane (KuT24), Chessington World of Adventures (KuT13 and KuT15) and the washed over developed areas of Malden Rushett (KuT17). Although these areas have significant pockets of development and urbanising influence, all have some separation from the large built-up area and scope for further loss of openness that could increase their sprawling influence.

3.391 Other areas that make a moderate contribution are located where the land is more contained and urbanised by urban areas and restricted by notable physical features, including the open but contained land north, south and east of the A3 and Kingston Bypass Junction (parcels KuT1, KuT2 and KuT4), Chessington Golf Course (KuT23) and the open land adjacent to Gilders Road (KuT25).

3.392 No Green Belt land in the borough makes a weak/no contribution to this purpose.

3.393 Figure 3.91 illustrates the variations in contribution to Purpose A across Kingston.

Figure 3.91: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.394 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.395 The areas of land that make a strong contribution to this purpose are located in and form a substantial part of the narrow and fragile gaps between the towns of Tolworth (via Chessington) and Esher (merged with Claygate and Hinchley Wood) (parcels KuT6-KuT8, KuT11 and KuT12), the weakening of which would result in a notable loss of visual separation between towns.

3.396 Other land that makes a strong contribution to Purpose B is open Green Belt land located to the south-east of Tolworth (via Chessington), in the more moderate but still notably visually open gap between and Tolworth (via Chessington) and Epsom (parcels KuT20-KuT22, KuT25 and KuT26). Several significant urban areas south of Horton Country Park and east and west of Horton Lane (all of which are planned to be released from and inset within the Green Belt in Epsom and Ewell's advanced emerging Local Plan), have narrowed this gap, reducing the open countryside maintaining separation between towns; however, thin woodland bands maintain separation. The Green Belt land directly to the north (parcels KuT23-KuT25) and south (KuT19) of this strongly contributing land generally makes a moderate contribution to this purpose.

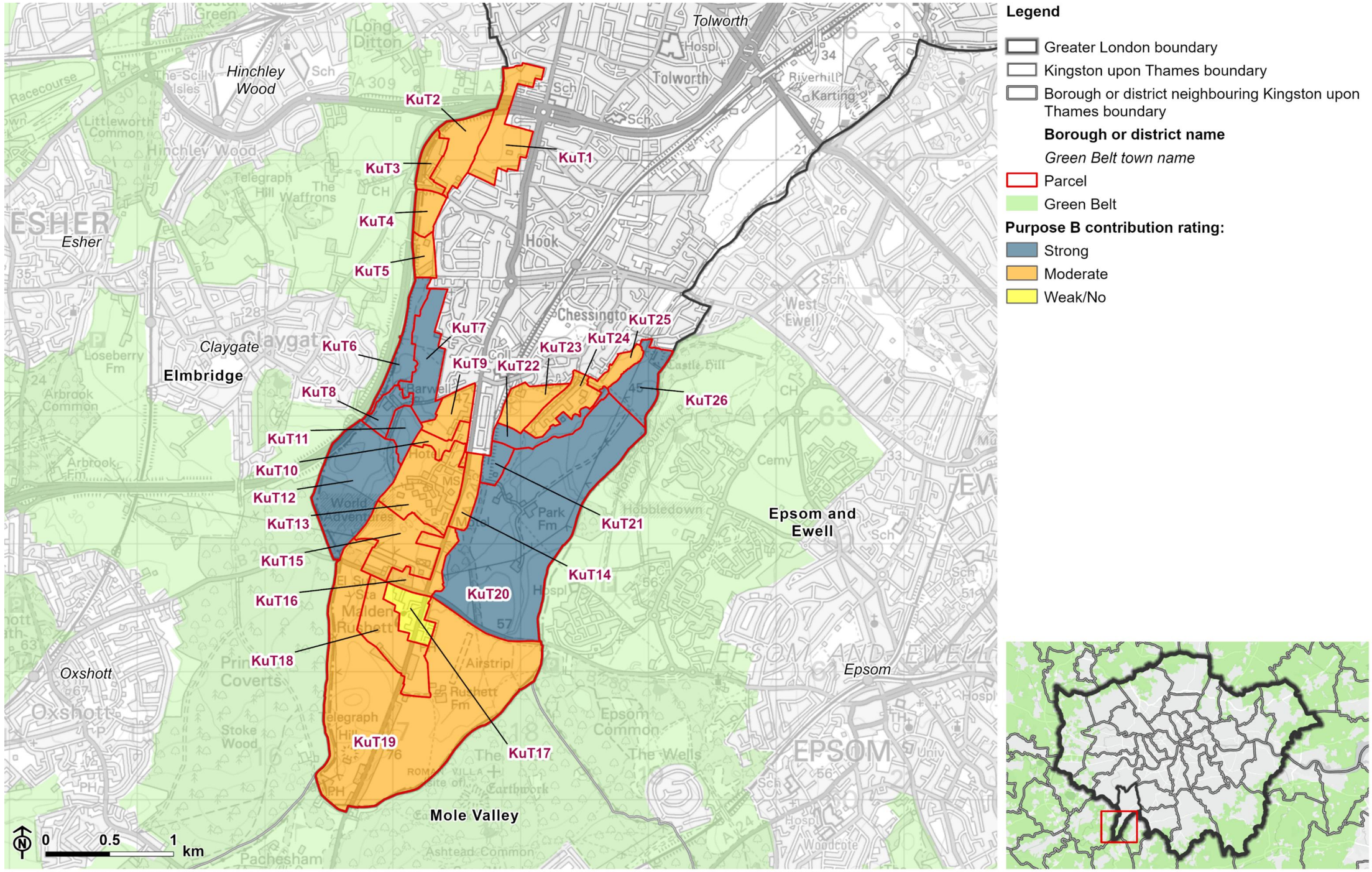
3.397 Parcels KuT1-KuT5 to the north west are more peripheral to the narrowest portions of the gap to the south and retained by the A3 such that they form a smaller and/or more urbanised part of the gap between towns to the south. Similarly, the land to the south (parcels KuT9, KuT10, KuT13, KuT14-KuT16 and the north-west of KuT19) is predominately influenced by the washed over development at Chessington World of Adventure, with the remaining open Green Belt land within and immediately adjacent to it forming a smaller and/or peripheral portion of the narrow gap between towns to the west.

3.398 The land to the south of Rushett Lane (parcels KuT18 and KuT19) make a moderate contribution to Purpose B. Whilst this land lies within a wider and more robust gap between towns to west, south and east with significant areas of woodland to the west, south and east maintaining separation, the wide-open area of countryside is not insignificant and development along and in the vicinity of the connecting roads between towns would still result in the minor loss of some visual separation between towns.

3.399 The only area of the borough that makes a weak/no contribution to this purpose the washed over village of Maldon Rushett which is largely developed and lies in a wider gap between towns (KuT17).

3.400 Figure 3.92 illustrates the variations in contribution to Purpose B across Kingston.

Figure 3.92: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.401 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

3.402 The majority of Green Belt in the Borough is largely open and has a clear connection with the wider countryside and therefore makes a strong contribution to Purpose C.

3.403 Areas that make a strong contribution are located away from the urban edge to the south west (parcels KuT6-KuT8, KuT10-KuT12), south (KuT14, KuT16, KuT18 and KuT19) and south east (parcels KuT14, KuT20-KuT23 and KuT26) of Chessington. These areas are generally open and have a clear relationship with the open countryside such that their development would have a notable urbanising influence. If development were to take place in these locations, the surrounding Green Belt would be subject to a stronger urbanising influence than is currently the case.

3.404 There are a number of areas of land that make a more moderate contribution to Purpose C by virtue of:

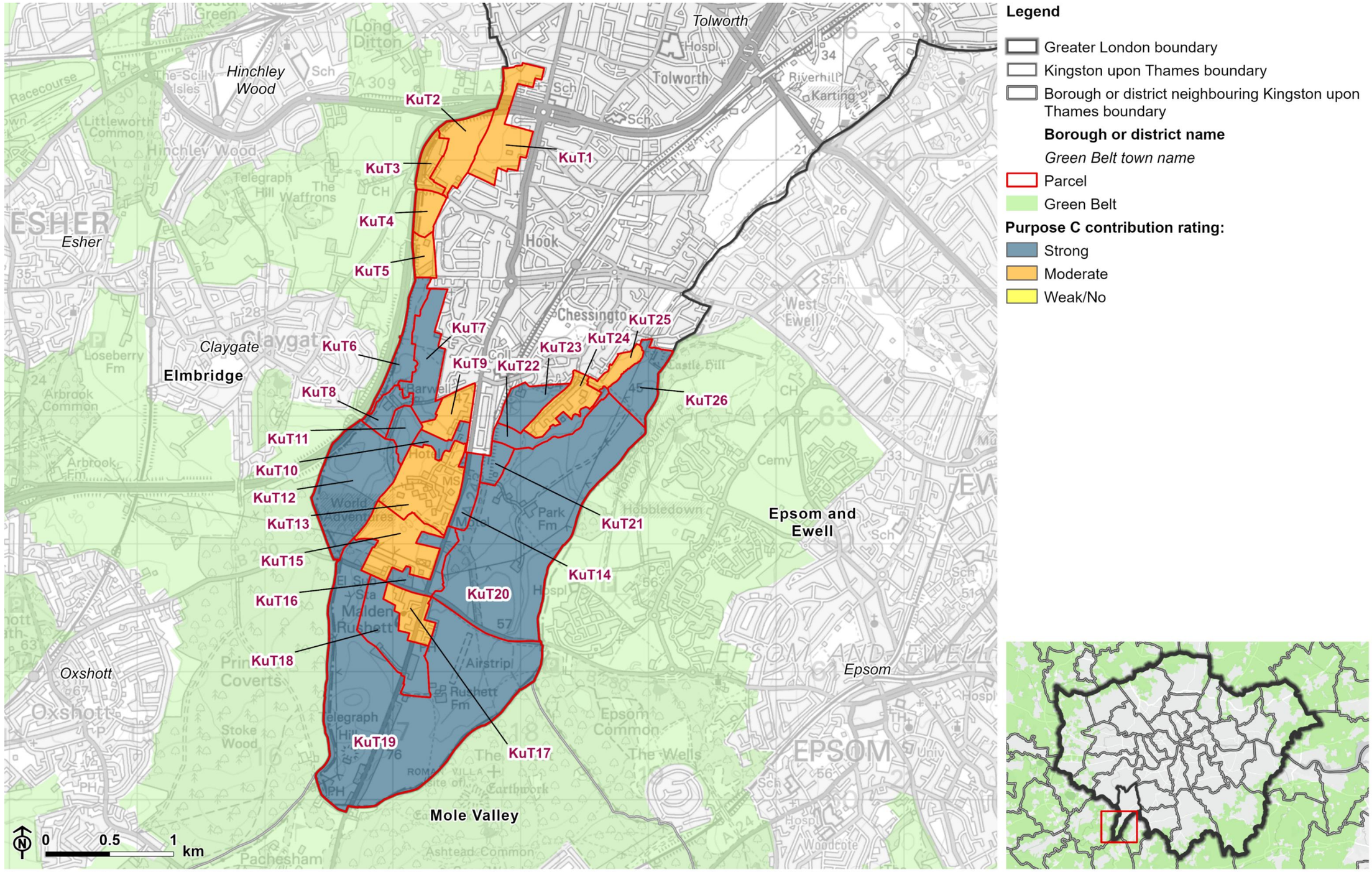
- their land use, which although broadly appropriate in the Green Belt is more associated with the urban area. For example, Southborough High School Playing Fields and King Edwards Recreation Ground (KuT1), Sir Francis Baker Recreation Ground and SHS Sport Ground (KuT9), and land to the south of Chessington World of Adventures (KuT15);
- their containment by urbanising urban areas or other inappropriate development or features in proximity that would limit the relationship with wider countryside as well as limiting the impact development would have on adjacent Green Belt land. For example, the open fields to the south and east of the A3 at the junction with the Kingston bypass (parcels KuT2 and KuT4) and the open land adjacent to Gilders Road (KuT25).
- inappropriate development within the Green Belt which lowers openness and has some urbanising influence, but open land in the area still has a relationship with the wider countryside. For example, the north of Clayton Road (KuT3), Lovelace Primary School (KuT5), Chessington World of Adventures (KuT13), development along Green Lane (KuT24) and the washed over village of Malden Rushett (KuT17); or,

- a combination of the above.

3.405 No Green Belt land in the borough makes a weak/no contribution to this purpose.

3.406 Figure 3.93 illustrates the variations in contribution to Purpose C across Kingston.

Figure 3.93: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.407 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B, the Borough contains and lies adjacent to six settlements large enough to be considered towns in Green Belt terms: Cobham (merged with Oxshott), Epsom, Esher (merged with Claygate and Hinchley Wood), Leatherhead (merged with Ashtead, Bookham and Fetcham), Tolworth, and Walton-on-Thames.

3.408 Within the urban area of Kingston there are a number of conservation areas, the majority of which are located deep within the large built-up urban areas and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt. These areas tend to be focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points).

3.409 Historic designations within and directly adjacent to the Green Belt are limited to a few isolated listed buildings and a scheduled monument. **Southborough Conservation Area**, located to the south of Kingston town centre and west of Tolworth, is the closest expansive historic designation to the Green Belt, although largely separated from it by built form and vegetation along Herne Road and Love Lane. The Southborough Conservation Area Appraisal (2009) notes that the area predominantly comprises late 19th and early to mode 20th century development. The appraisal contains no mention of any connection between the area and the wider open countryside designated as Green Belt, noting *'views through the conservation area are limited due to the topography and street layout'*.

3.410 Cobham and Oxshott are located within Elmbridge District to the west of Kingston. The historic core of Cobham is protected by **Cobham Conservation Area** and **The Tilt Conservation Area** immediately to the south-east. The Cobham Conservation Area Character Appraisal (n.d.) notes that the historic 'covers the area historically known as Church Cobham to the southern end of the settlement'. Due to its location on the south-western edge of the modern town, beyond intervening later development, and the presence of extensive intervening woodland at Prince's Coverts to the east of Oxshott, the town has limited physical or visual connection with Kingston's Green Belt.

3.411 Walton-on-Thames lies within Elmbridge District lies a significant distance to the west of Kingston, and has limited physical or visual connection with Kingston's Green Belt due to extensive intervening woodland at Prince's Coverts, the Kingston

Bypass (A3) and the urban areas of Esher and Claygate beyond. The nearest notable historic designation within the neighbouring Borough of Elmbridge is **Long Ditton Conservation Area**, which is located at the edge the large built-up area, merged with Southborough in the Kingston and therefore forming part of the wider urban area of Kingston. A Conservation Area Appraisal has yet to be published by the neighbouring Borough; however, the Conservation Area covers the extent of the historic church, manor house and gardens and has no direct connection with the historic town of Kingston to the north. Furthermore, the Kingston Bypass (A3) and mature woodland along it and at the conservation area's southern edge screens any visual relationship between this historic area and the wider Green Belt within Kingston.

3.412 Epsom lies directly to the south-east of Kingston's Green Belt in the neighbouring Borough of Epsom and Ewell but is largely separated from it by significant areas of woodland including that within Horton Country Park and Epsom and Ashtead Commons. The nearest notable historic designation within the neighbouring Borough of Epsom and Ewell is a cluster of Conservation Areas known as the 'Hospital Cluster' and comprised of Horton, Long Grove, St Ebba's, The Manor and West Park which relates to hospital development from the late 19th and early 20th centuries. West Park, sandwiched between Horton Country Park and the Epsom and Ashtead Commons lies in close proximity to the Kingston's Green Belt. The Epsom 'Hospitals Cluster Conservation Areas Character Appraisal and Management Proposals (2009) notes *'Views within the conservation area are constrained by the tall blocks of buildings and many trees…[but]…views out of the site over fields and lines of trees to the north west, where the land rises gently, are of particular merit. The garden and land around Hollywood House, which is highly visible from the access road leading to West Park Hospital, also forms part of the rural setting to the hospital'*. Focussed on the historic significance of setting of the hospital complex isolated in the open countryside away from the historic town of Epsom, this cluster of conservation areas is not considered to form part of the historic setting and special character of the historic town. Furthermore, the emerging Epsom and Ewell Local Plan (2022-2040) outlines plans to release large parts of these areas, insetting them within the Green Belt and allocating them for the delivery of new homes.

3.413 Leatherhead lies directly to the south of Kingston in the neighbouring District of Mole Valley. However, the town has limited physical and visual connection with Kingston's Green Belt due to significant intervening wooded ridges at Epsom and Ashtead Commons. Consequently, the historic setting and special character of Leatherhead has no notable connection with the wider Green Belt land within Kingston.

3.414 In addition to the Borough's and neighbouring authority Conservation Areas, the Borough's Views Study identifies several views of local importance which look out on to the Green Belt land designated in the Borough [See reference]. Relevant viewpoint reference numbers include: 44, 45, 47, 48, 122i, 122ii, 122iii, 125, 126, 127 and 178. The proforma assessments of each viewpoint have been reviewed to establish whether their importance relates to the setting and special character of the identified historic towns (in Green Belt terms), but no such connection was found. Historic elements of these specific views are limited to isolated views of isolated listed buildings, such as farm buildings.

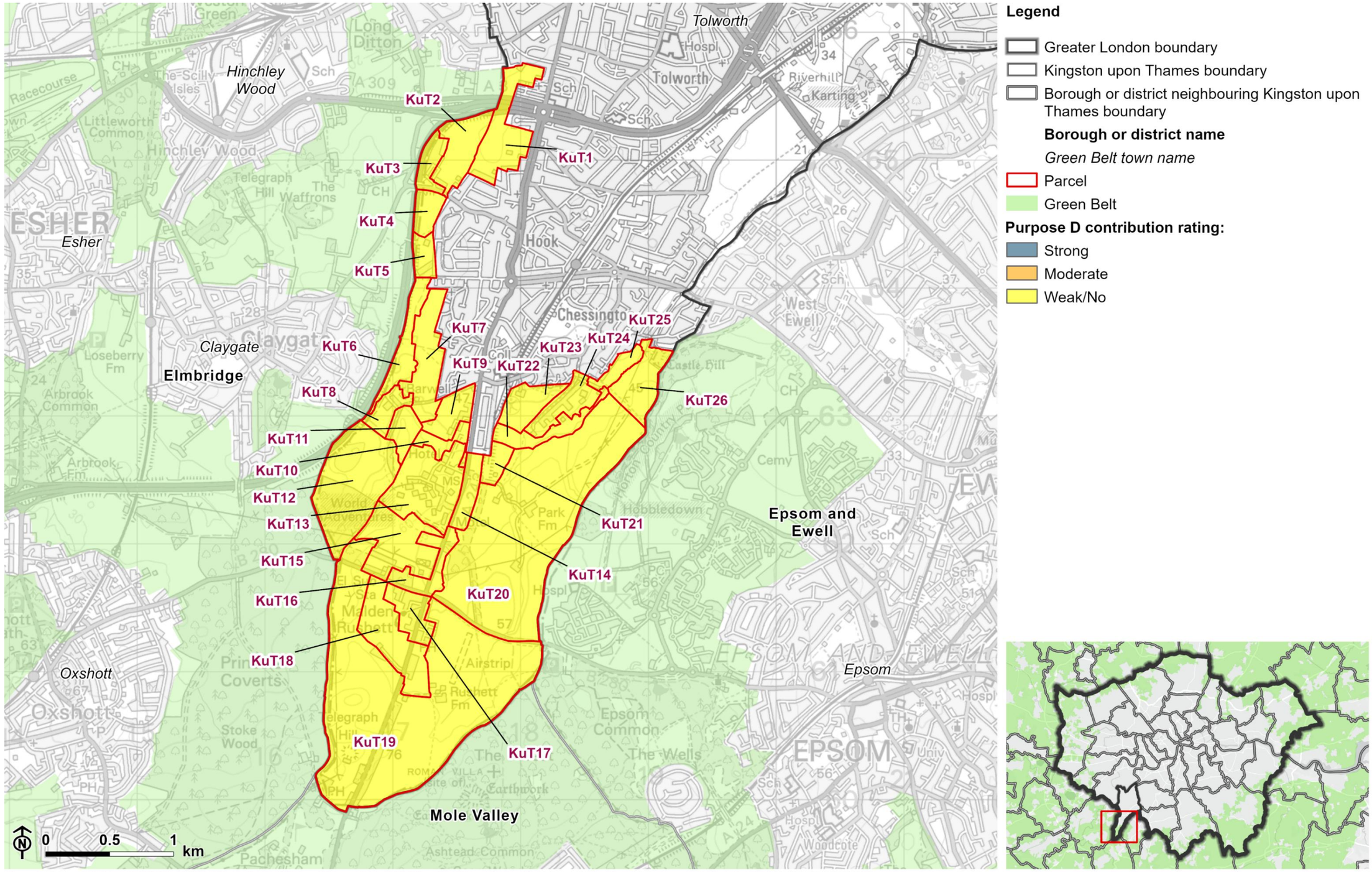
3.415 Therefore, none of the Green Belt land within Kingston is considered to make a contribution to Green Belt Purpose D.

3.416 It is important to note that this conclusion does not mean that the Borough does not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.417 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.418 Figure 3.94 illustrates the variations in contribution to Purpose D across Kingston.

Figure 3.94: Contribution to Purpose D – Preserve the setting and special character of historic towns



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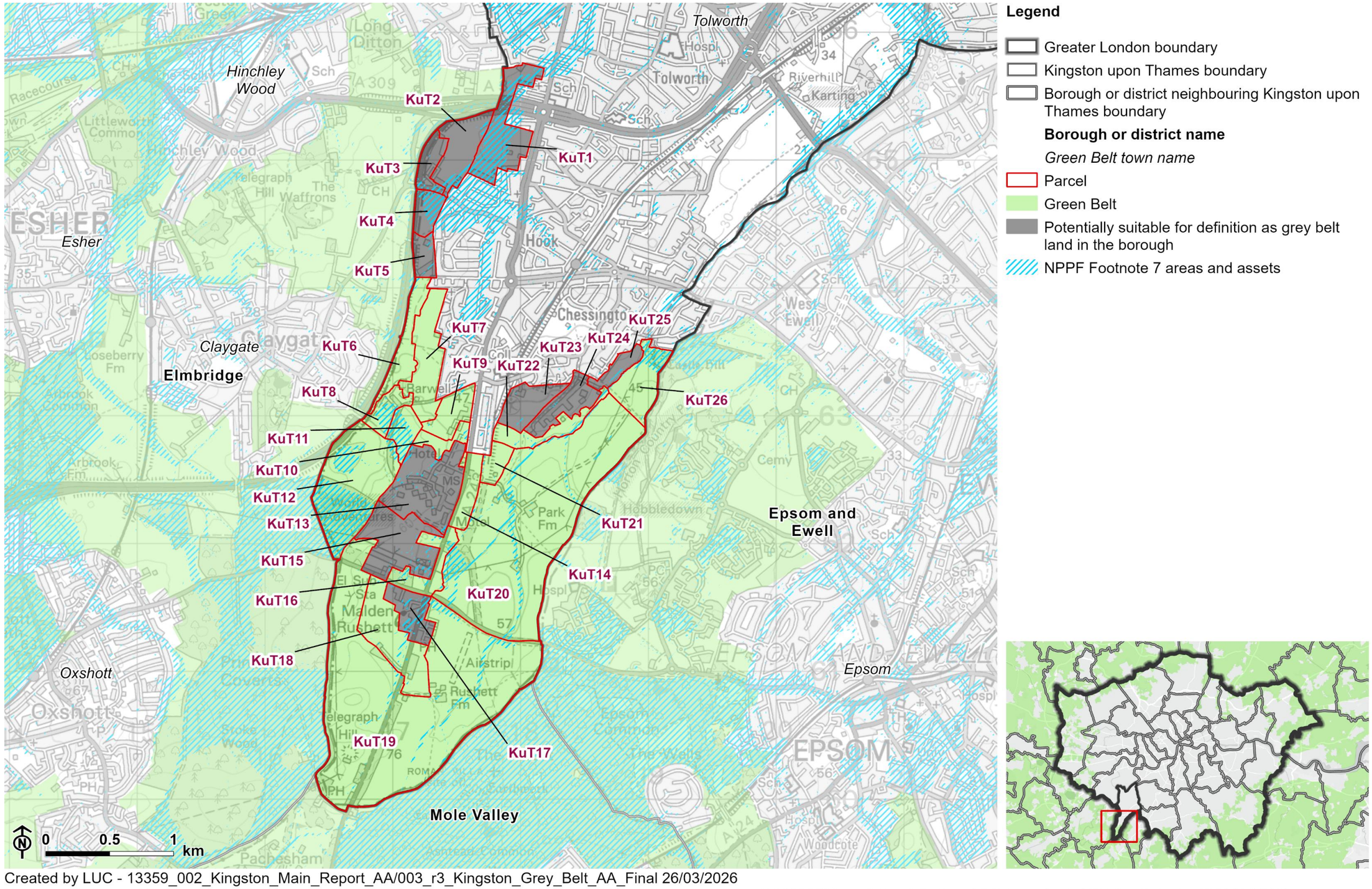
Potential grey belt in the London Borough of Kingston

3.419 Having regard to the definition set out in the NPPF, the following areas of Kingston are defined as having potential for definition as grey belt land subject to further work by the borough:

- Land north and south of the A3 and Kingston Bypass junction (parcels KuT1-KuT5). This area makes a moderate contribution to purposes A, B and C and a weak/no contribution to Purpose D.
- Land at Chessington World of Adventures (KuT13) which makes a moderate contribution to purposes A, B and C and a weak/no contribution to Purpose D.
- More open land south of the main part of Chessington World of Adventures (KuT15), which makes a moderate contribution to purposes A, B and C and weak/no contribution to Purpose D.
- The washed over settlement of Malden Rushett (KuT17 which makes a moderate contribution to purposes A and C and a weak/no contribution to purposes B and D.
- Washed over residential development at Green Lane and the contained open land directly to its north west (KuT23) and north east (KuT25) which make a moderate contribution to purposes A and B and a weak/no contribution to Purpose D. Chessington Golf Centre makes a strong contribution to Purpose C, whereas the open land adjacent to Gilders Road (KuT25) makes a moderate contribution to Purpose C.

3.420 Figure 3.95 illustrates the area potentially suitable for definition as grey belt land within Kingston.

Figure 3.95: Green Belt land potentially suitable for definition as grey belt land



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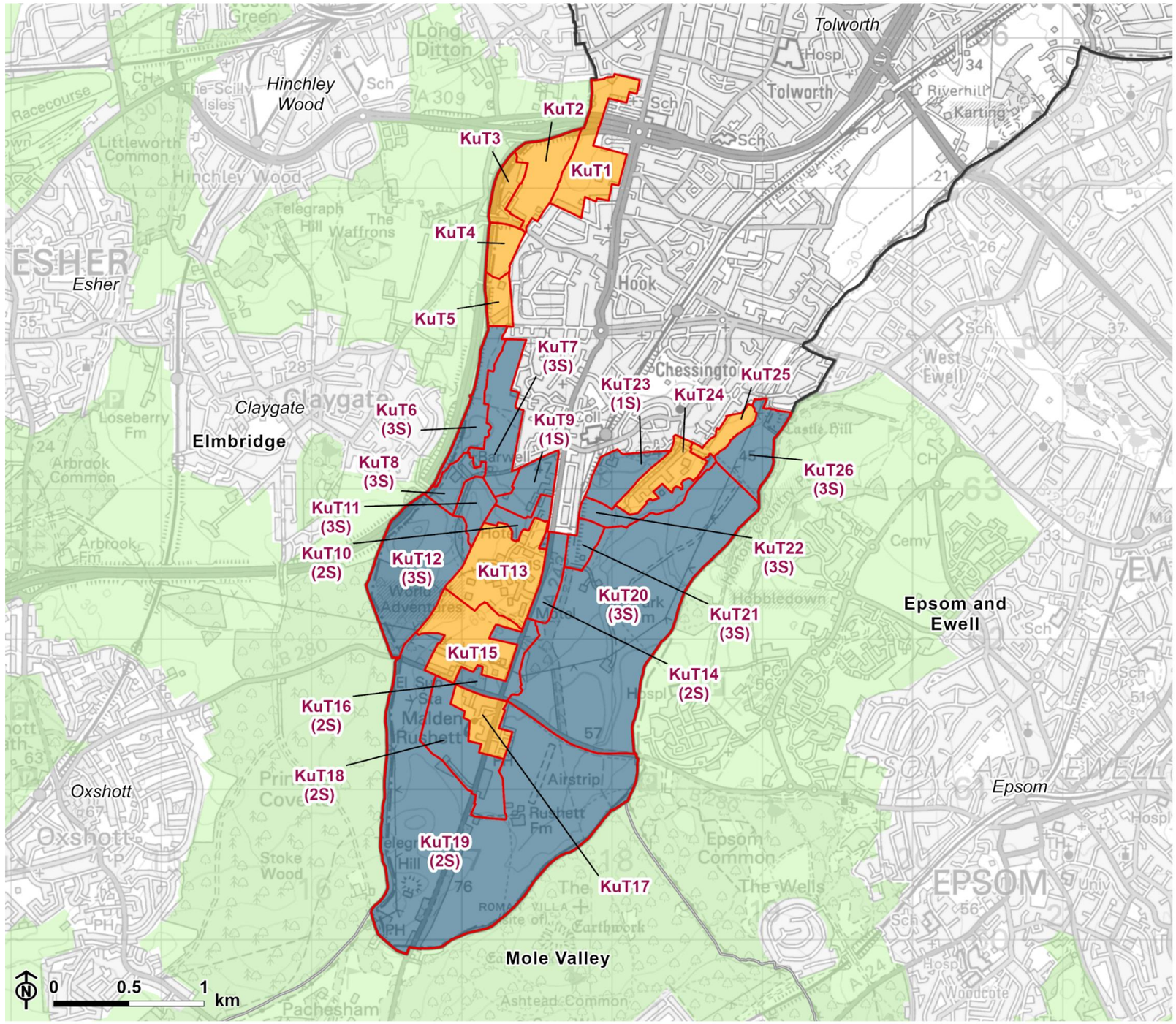
Highest and lowest contributing Green Belt land

3.421 The majority of the Green Belt in Kingston makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include the open land:

- In the narrow gap between Tolworth (via Chessington) and Esher (merged with Claygate and Hinchley Wood) which makes a strong contribution to purposes A and B and C (parcels KuT6-KuT12);
- To the south of Rushett Lane which makes a strong contribution to purposes A and C (parcels KuT18 and KuT19);
- Open land immediately to the east and west of the A243 (parcels KuT10, KuT14 and KuT16) which makes a strong contribution to Purpose A and C; and,
- Open land in the gap between Tolworth (via Chessington) and Epsom (parcels KuT20, KuT21, KuT22 and KuT26), which make a strong contribution to purposes A, B and C.

3.422 Figure 3.96 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.96: Highest contribution to NPPF Green Belt purposes



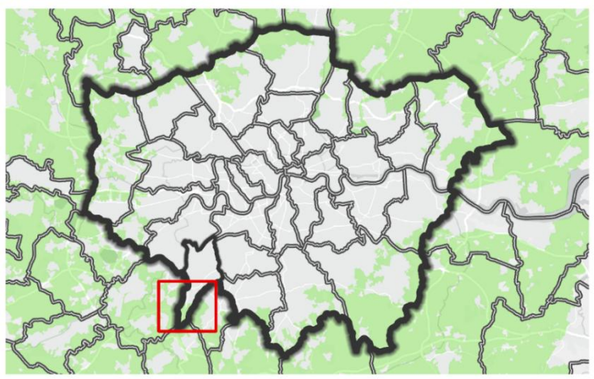
Legend

- Greater London boundary
- Kingston upon Thames boundary
- Borough or district neighbouring Kingston upon Thames boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.423 In light of the scale and contiguity of Green Belt land in Kingston and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with Chessington World of Adventure, Claygate and/or Malden Rushett beyond would likely have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Tolworth (via Chessington) and Esher (merged with Claygate).
  - Tolworth (via Chessington) and Epsom.
- Release or development of the vast majority of all the open Green Belt land within Kingston would likely have a fundamental impact on Purpose C.

Newham

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.424 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

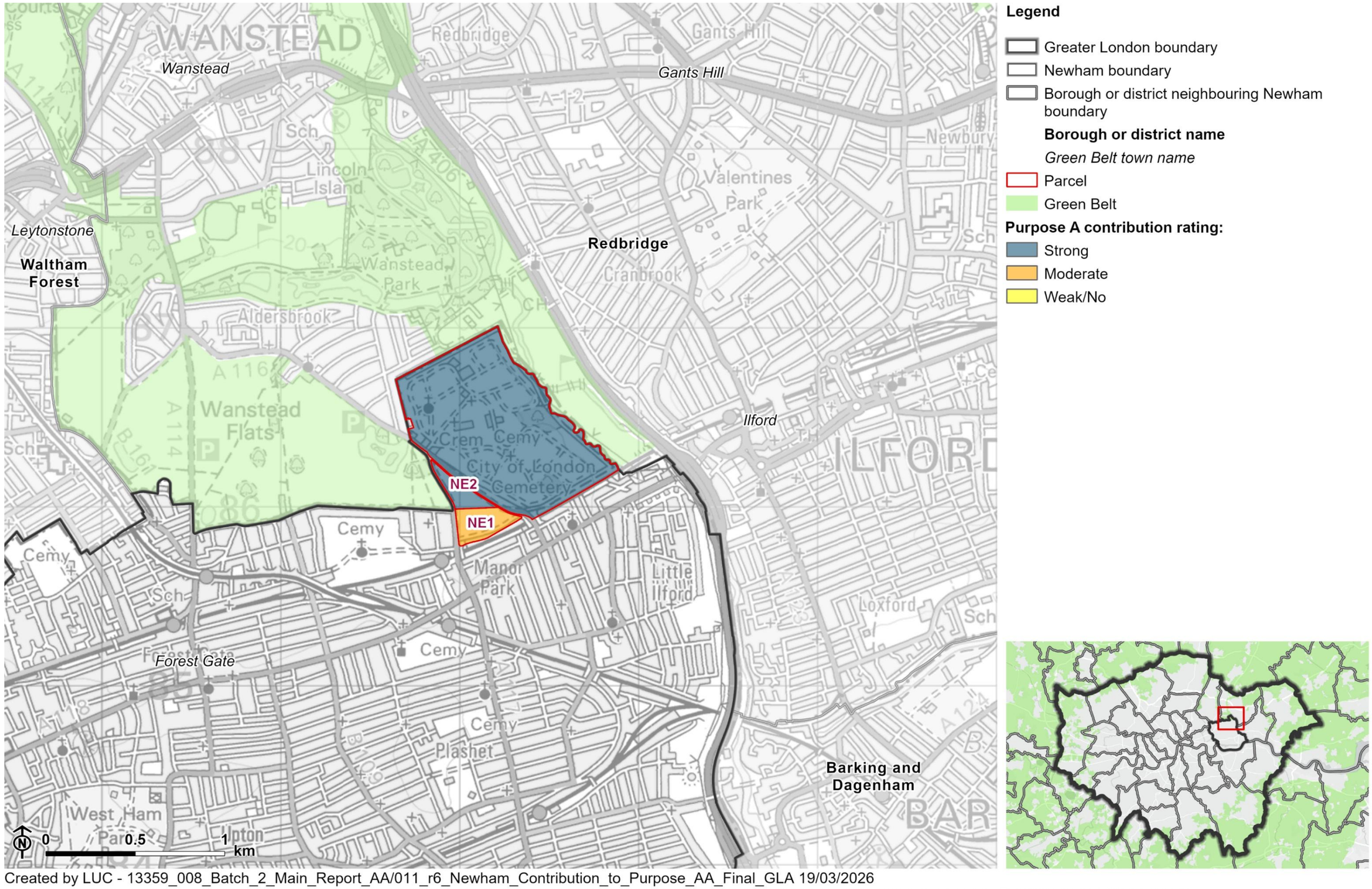
3.425 The wooded City of London Cemetery and the less contained northern portion of the Manor Park Flats (NE2) makes a strong contribution to Purpose A. The wooded cemetery plays an important restricting role on the wider large built up area such that its weakening or loss would have an adverse impact on this purpose. Furthermore, the northern portion of the Manor Park Flats lies beyond the containing urban area and the treelined Forest Drive to the west. Furthermore, development in cemetery would serve to weaken separation between the large built up area of Greater London and neighbouring Aldersbrook. Although Aldersbrook is wholly contained within the wider large built-up area of Greater London such that its merging with the large built-up area would not represent the outward sprawl of the city, the

merging of Aldersbrook with the surrounding urban area would still have an incongruous sprawling influence on the Green Belt within the immediate vicinity, notably the City of London Cemetery, Wanstead Flats and Wanstead Park.

3.426 The same cannot be said for the more contained southern portion of the Manor Park Flats (NE1), which although open is more immediately contained by the urban area of Manor Park to the south such that it makes a moderate contribution to Purpose A.

3.427 Figure 3.97 illustrates the variations in contribution to Purpose A across Newham.

Figure 3.97: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

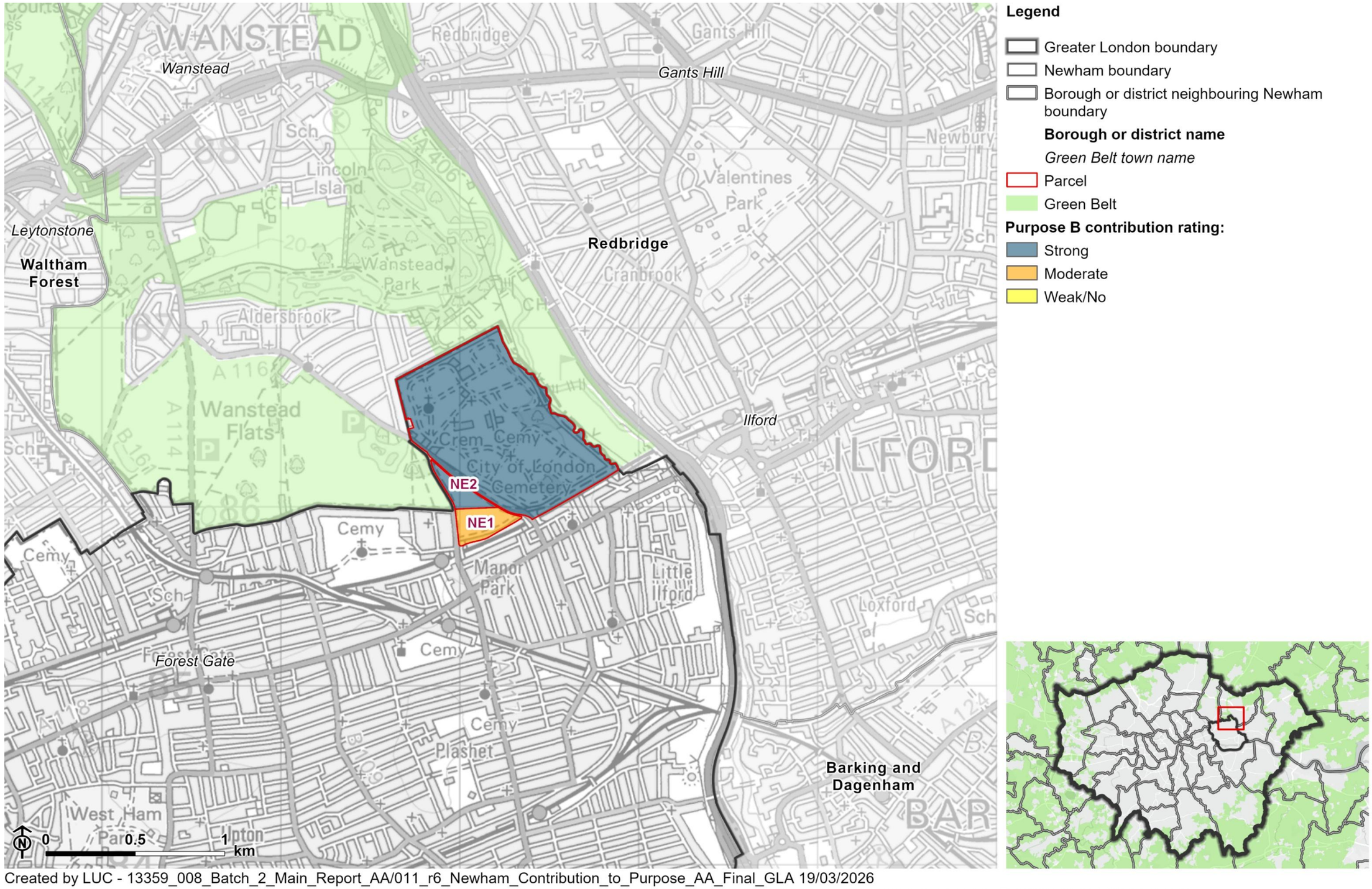
3.428 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.429 The wooded City of London Cemetery and the less contained northern portion of the Manor Park Flats (NE2) makes a strong contribution to Purpose B. The wooded cemetery grounds represents the main separating feature between Forest Gate/Ilford (via Manor Park) and Aldersbrook. Although Aldersbrook is not a town in its own right, its merging with the urban area to the south would significantly narrow the gap between Leytonstone/Wanstead and Ilford (via Manor Park) but for the small Bush Wood to the north west of Aldersbrook.

3.430 The same cannot be said for the more contained southern portion of the Manor Park Flats (NE1), which although open is more immediately contained by the urban area of Manor Park to the south such that it represents a much smaller part of the gap between towns and development within would have no more than a minor impact on visual separation overall. Consequently, this area makes a moderate contribution to Purpose B.

3.431 Figure 3.98 illustrates the variations in contribution to Purpose B across Newham.

Figure 3.98: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

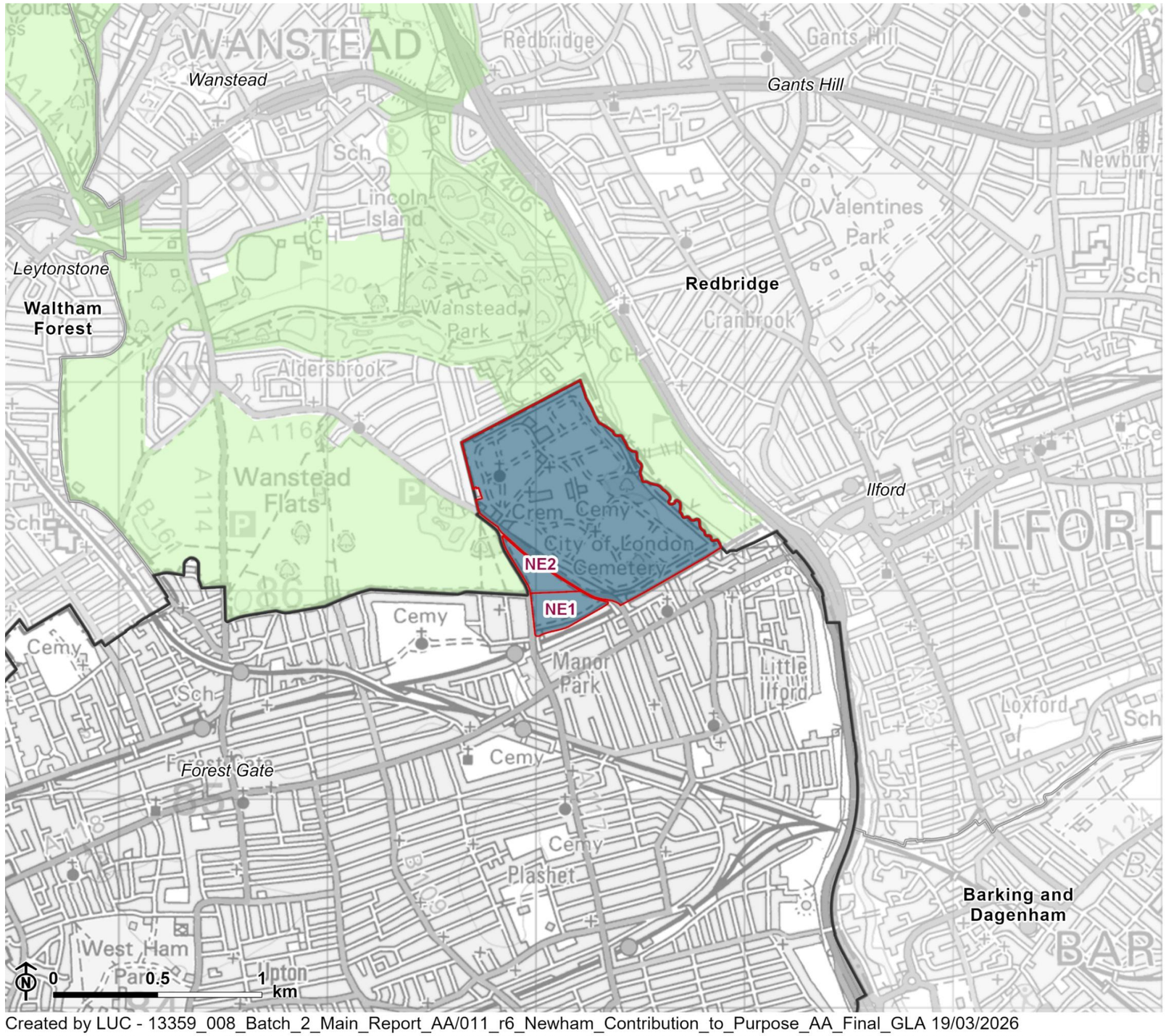
3.432 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

3.433 All Green Belt land within Newham makes a strong contribution to Purpose C. The wooded City of London Cemetery and the less contained northern portion of the Manor Park Flats (NE2) has a limited visual relationship with the surrounded urban edge and strong physical connection to the wider countryside to the east (Roding Valley) and west (Wanstead Flats). The wooded cemetery plays an important restricting role on the surrounding urban area, inhibiting its encroachment of the countryside. Development in Green Belt would exert and increased urbanising influence through thinning of the woodland and or the increased urban containment of the open countryside to the east and west.

3.434 The same can be said for the more contained southern portion of the Manor Park Flats (NE1), which although more contained by the urban area of Manor Park to the south, the lack of a notable boundary feature at the north edge of the parcel increases the likelihood that development in this open area exert a significant urbanising influence on the wider Manor Park Flats which plays an important role in connecting Wanstead Flats to the west with the Roding Valley to the east.

3.435 Figure 3.99 illustrates the variations in contribution to Purpose C across Newham.

Figure 3.99: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment

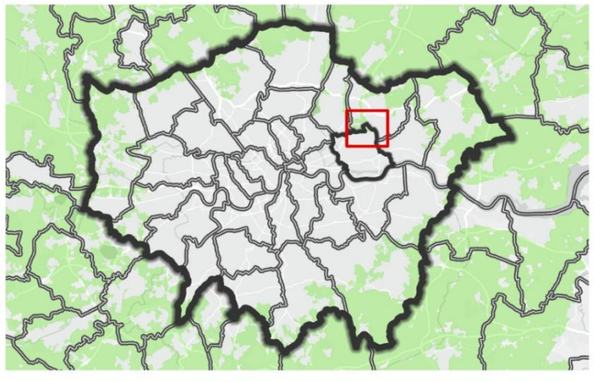


Legend

- Greater London boundary
- Newham boundary
- Borough or district neighbouring Newham boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose C contribution rating:

- Strong
- Moderate
- Weak/No



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.436 A review of relevant historic designations within and adjacent to the borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the borough contains and lies adjacent to five settlements large enough to be considered towns in Green Belt terms: Forest Gate, Gants Hill, Ilford, Leytonstone and Wanstead.

3.437 Within these urban areas there are a number of conservation areas, the majority of which are located deep within the large built-up urban areas and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt within Newham. These areas tend to be focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points).

3.438 Notable exceptions include the conservations areas located within Green Belt town areas that lie adjacent to and/or include areas of Green Belt land. These include:

- The **Forest Gate Town Centre Conservation Area** covers the historic core of the settlement. The town began as a hamlet on the edge of Epping Forest but then began to grow, with the coming of the railways from 1841, into an extensive Victorian suburb (including land to the east of the town centre, covered by **Woodgrange Estate Conservation Area**, **Durham Road Conservation Area** and **Romford Road Conservation Area**). Later maps show further development and the effects of wartime bombing and reconstruction. The town has an historic association with Wanstead Flats (which forms the southern extent of Epping Forest), to which this was an entrance ('Forest Gate'). This area (lying within the London Borough of Redbridge) forms part of the towns wider setting, with the linear north-south layout of Woodgrange Road/Woodford Road (A114) affording some distant views north to the southern edge of Wanstead Flats. No land within Newham contributes to the setting and special character of Forest Gate, as the presence of intervening development restricts any physical or visual connection with the core of the historic town.
- Aldersbrook is an Edwardian suburb that forms part of the wider suburban edge of Wanstead (located within the London Borough of Redbridge) and is protected by the **Aldersbrook and Lake House Conservation Area**. It lies immediately south of Wanstead Park, north of Wanstead Flats and north-west of the Grade I listed **City of London Cemetery Registered Park and Garden** that lies within Newham. The Aldersbrook and Lake House Conservation Area Appraisal (2020) notes that *'Views from the ends of streets in the Conservation Area*

towards and across these spaces are fundamental to the experience of the Conservation Area as a self-contained urban development in an otherwise open, green and undeveloped area'.

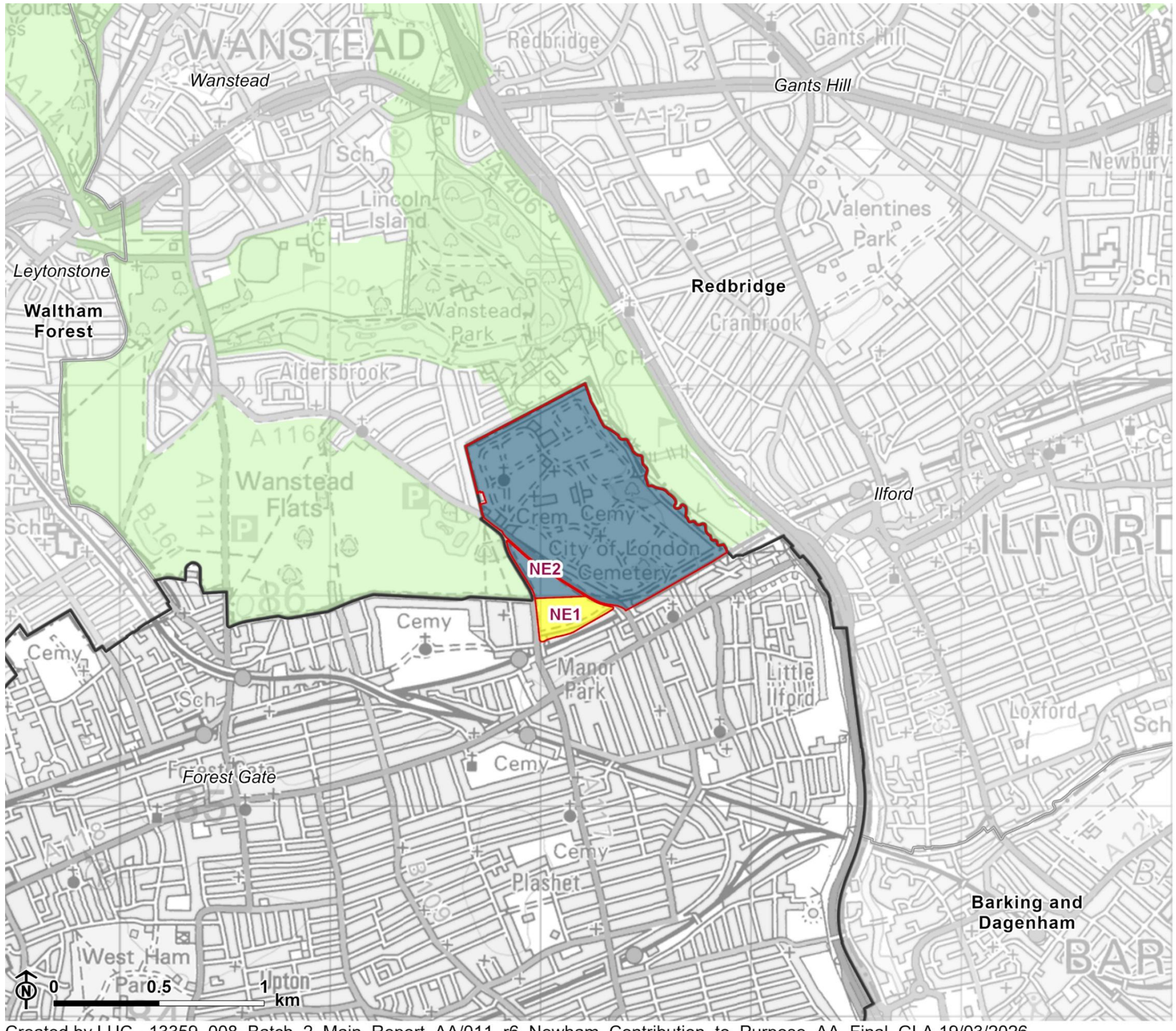
3.439 Based on the above only one area within the borough is considered to make a strong contribution to Green Belt Purpose D, that within the City of London Cemetery Registered Park and Garden (parcel NE2). This area forms part of an open setting to the south-east of Aldersbrook (Wanstead), with important views from the ends of streets.

3.440 It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.441 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.442 Figure 3.100 illustrates the variations in contribution to Purpose D across Newham.

Figure 3.100: Contribution to Purpose D – Preserve the setting and special character of historic towns



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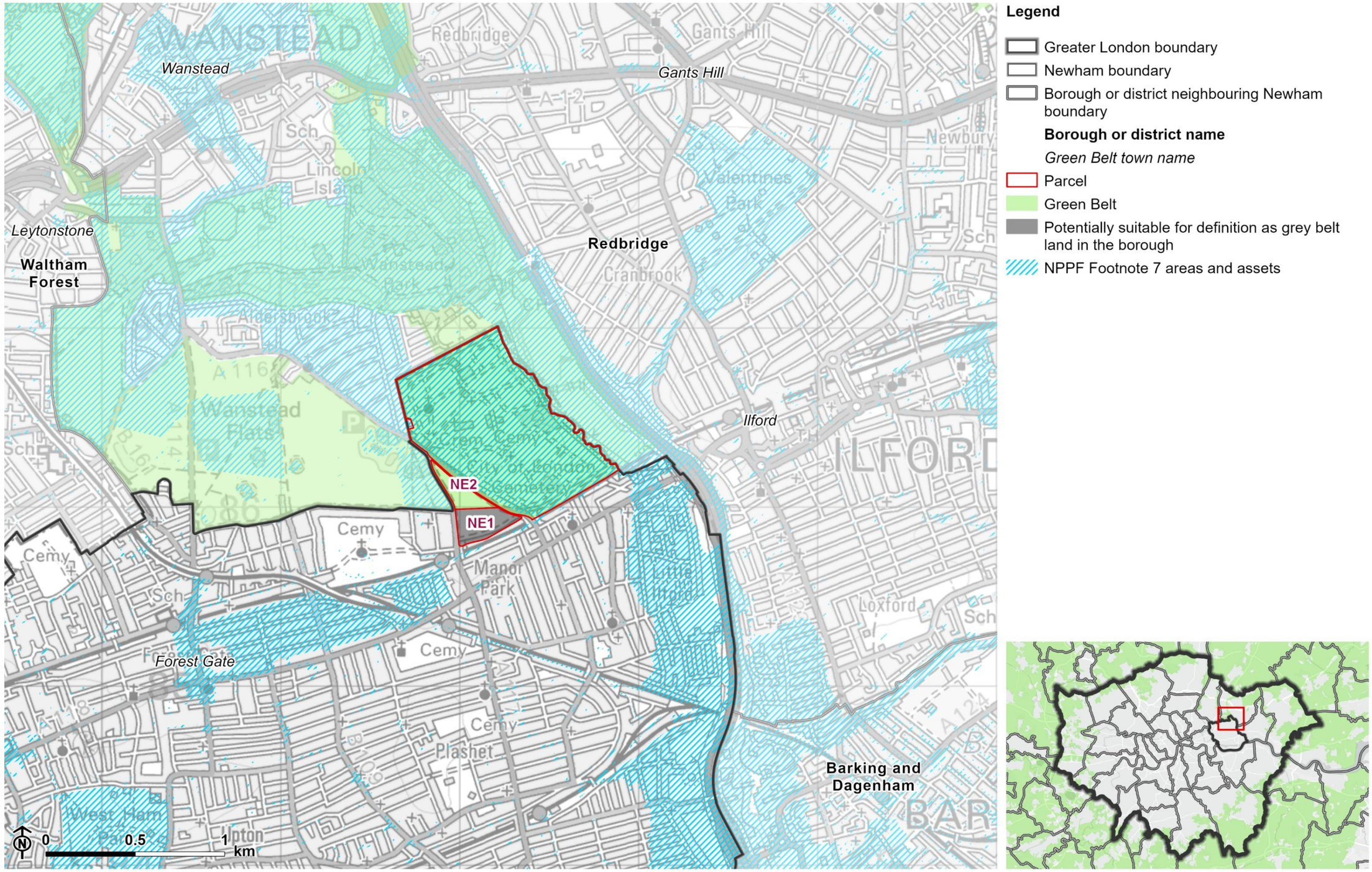
Potential grey belt in the London Borough of Newham

3.443 Having regard to the definition set out in the NPPF, only the contained southern portion of the Manor Park Flats (parcel NE1) is considered to have potential to be defined as grey belt land subject to further work by the borough.

3.444 Figure 3.101 illustrates the area potentially suitable for definition as grey belt land within Newham.

Figure 3.101: Green Belt land potentially suitable for definition as grey belt land



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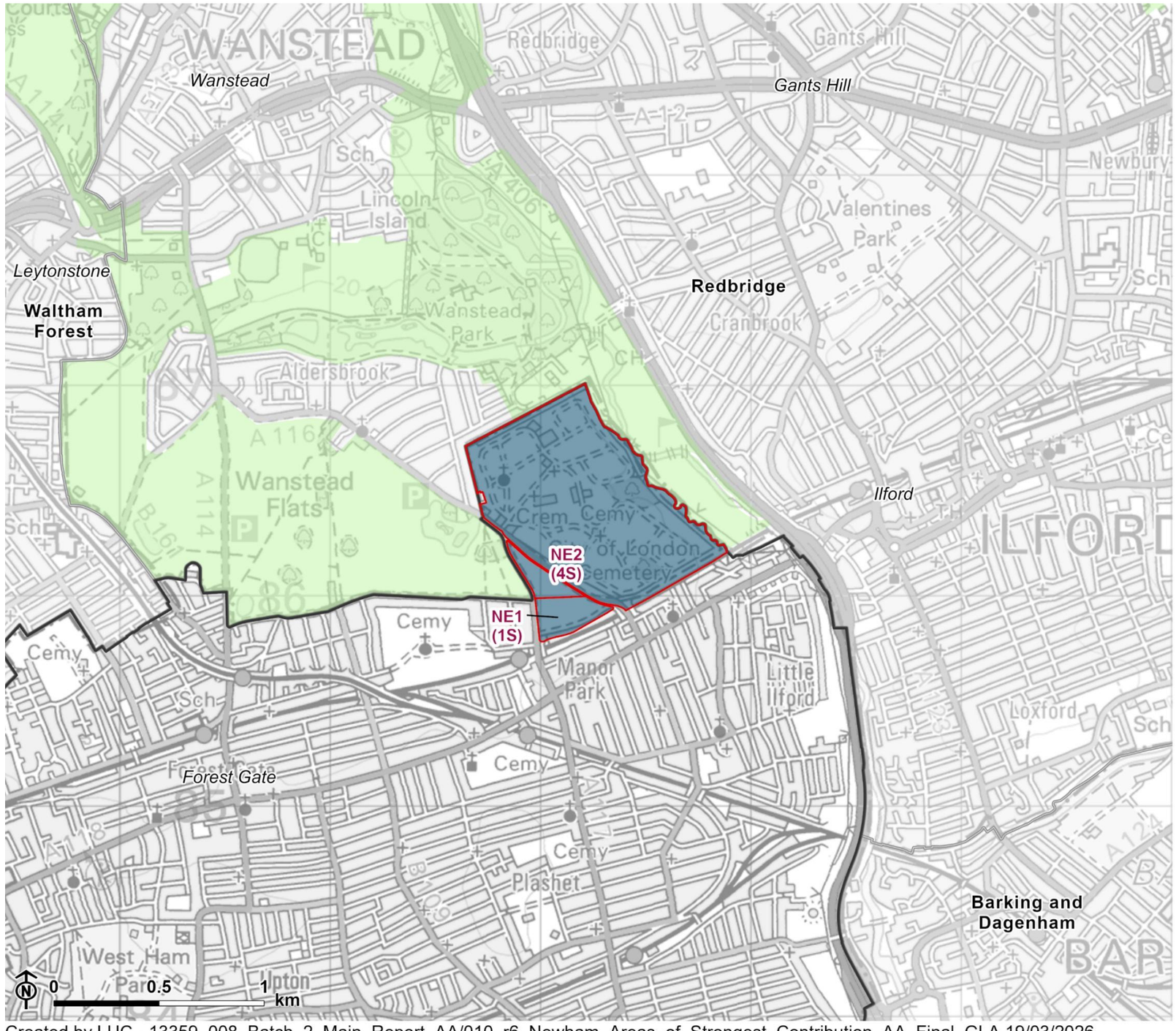
Highest and lowest contributing Green Belt land

3.445 Newham contains a relatively small area of Green Belt land but its location and openness are such that it generally makes a strong contribution to the Green Belt purposes. The wooded City of London Cemetery and the less contained northern portion of the Manor Park Flats (NE2) makes a strong contribution to purposes A, B, C and D. The more contained southern portion of the Manor Park Flats (NE1) is open but more immediately contained by the urban area of Manor Park to the south such that it makes a moderate contribution to purposes A and B, a strong contribution to Purpose C and a weak/no contribution to Purpose D.

3.446 Figure 3.102 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.102: Highest contribution to NPPF Green Belt purposes



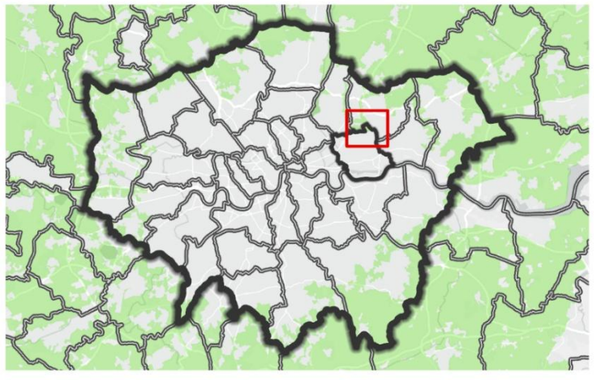
Legend

- Greater London boundary
- Newham boundary
- Borough or district neighbouring Newham boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.447 In light of the scale and contiguity of Green Belt land in Newham and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with Aldersbrook would have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of Forest Gate and Illford (via Manor Park) with Aldersbrook would have a fundamental impact on Purpose B. Although Aldersbrook is not a town in its own right, its merging with the urban area to the south would significantly narrow the gap between Leytonstone/Wanstead and Forest Gate/Ilford (via Manor Park) but for the small Bush Wood to the north west of Aldersbrook.
- Release or development of the vast majority of all the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release or development of the City of London Cemetery Registered Park and Garden (parcel NE2) would likely have a fundamental impact on Purpose D.

Redbridge

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.448 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

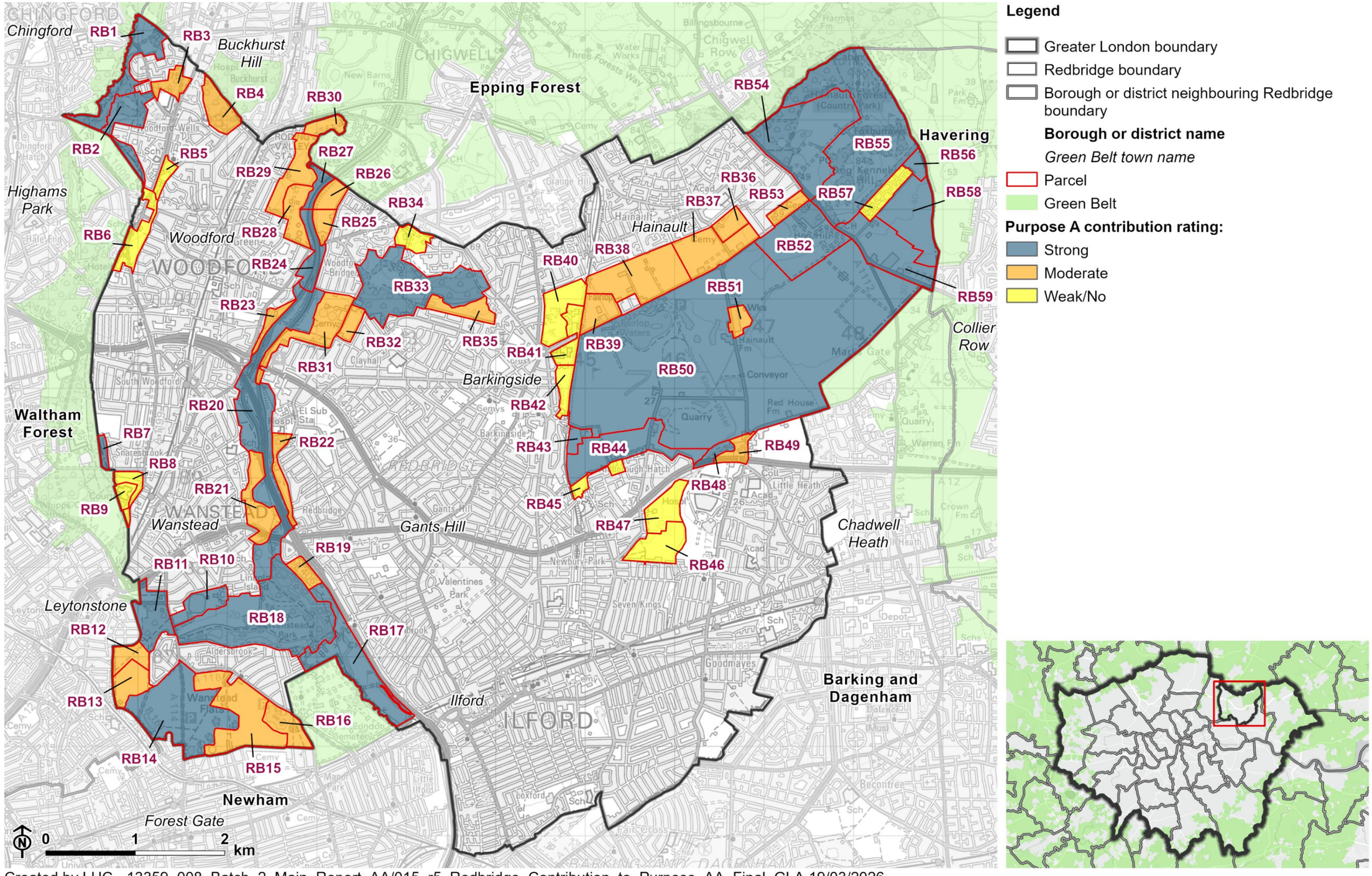
3.449 The areas of the borough that make a strong contribution to Purpose A are the least urbanised, open and often well treed parcels across the borough, which prevent localised sprawl into the open countryside in their immediate vicinity (parcels RB1-RB3, RB7, RB10 and RB11, RB14, RB17 and RB18, RB20, RB24, RB27, RB33, RB44 RB50, RB52, RB54, RB55, RB56, RB58 and RB59). Release and development in these locations would represent notable incongruous sprawl into the open countryside.

3.450 Green Belt land that is particularly developed (parcels RB9, RB41 and RB57) and/or contained and urbanised by the surrounding urban area (parcels RB5, RB6, RB8, RB34, RB40, RB42, RB43, RB46 and RB47) make a weak/no contribution to Purpose A.

3.451 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more contained by the large built-up area but are still generally open and sufficiently distinct from the large built up area that development would have some sprawling influence.

3.452 Figure 3.103 illustrates the variations in contribution to Purpose A across Redbridge.

Figure 3.103: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.453 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.454 The areas that make a strong contribution are the least urbanised, open and often well treed parcels in the narrowest and therefore most fragile gaps between neighbouring towns. Parcels that make strong contribution to Purpose B include:

- Parcels RB1, RB2, RB5 and RB6 make a strong contribution maintaining separation between the neighbouring towns of Chingford/Highams Park and Woodford.
- Parcel RB7, a relatively small parcel, which forms part of a wider area of Green Belt land in neighbouring Waltham Forest, maintaining separation between the neighbouring towns of Wanstead/Woodford and Walthamstow.
- Parcels RB10-RB18 make a strong contribution maintaining separation between the neighbouring towns of Forest Gate, Gants Hill, Ilford, Leytonstone and Wanstead, all via Aldersbrook – a small distinct urban area that sits between them.
- Parcels RB20, RB21 and RB30 make a strong contribution maintaining separation between the neighbouring towns of Wanstead/Woodford and Gants Hill and Barkingside/Hainault (via Woodford Bridge). Similarly Parcels RB24-RB28 make a strong contribution maintaining separation between Woodford and Barkingside/Hainault (via Woodford Bridge).
- Parcels RB52 and RB55 make a strong contribution to this purpose as their wooded slopes represent the most substantial separating feature in the more moderate gap between the neighbouring towns of Collier Row and Hainault.

3.455 Green Belt land that is particularly developed (parcels RB9, RB41 and RB57) or contained and urbanised by the surrounding urban area such that do lie in notable open gaps between neighbouring towns (parcels RB34, RB40, RB42, RB45, RB46 and RB47) make a weak/no contribution to Purpose B.

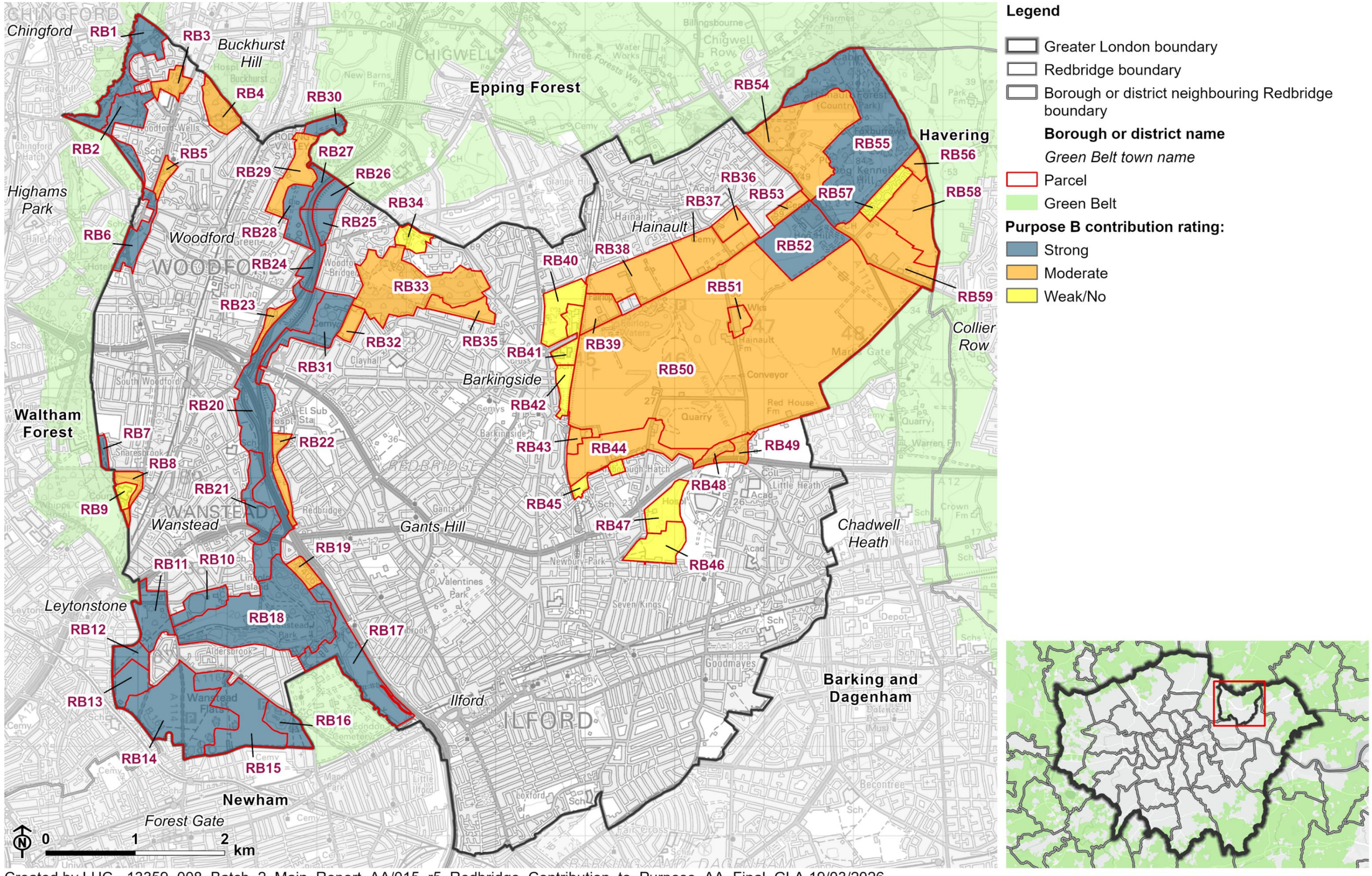
3.456 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as:

- Open Green Belt land at Claybury Park (parcels RB32 and RB34) which maintain some separation between the already merged towns of Barkingside (via Clayhall) and Hainault (via Woodford Bridge).

- Open Green Belt land in and to the east of Fairlop Waters Country Park (parcels RB36-RB40, RB43 and RB44, RB48 and RB48-RB52), which lies in a wider and so less fragile gap between Barkingside/Chadwell Heath and Hainault, which are already merged via the urban areas of Fairlop and Fullwell Cross to the west.
- Open Green land either side of the wooded ridge of Hainault Forest (parcels RB54, RB56, RB58 and RB59), which lie in a wider and so less fragile gap between Collier Row and Hainault.
- Where the land is more contained by urban areas or peripheral to fragile gaps but are still generally open and sufficiently distinct that they still play some separating role between closely neighbouring towns (parcels RB3-RB5, RB9, RB19, RB22 and RB23, RB29 and RB32).

3.457 Figure 3.104 illustrates the variations in contribution to Purpose B across Redbridge.

Figure 3.104: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.458 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

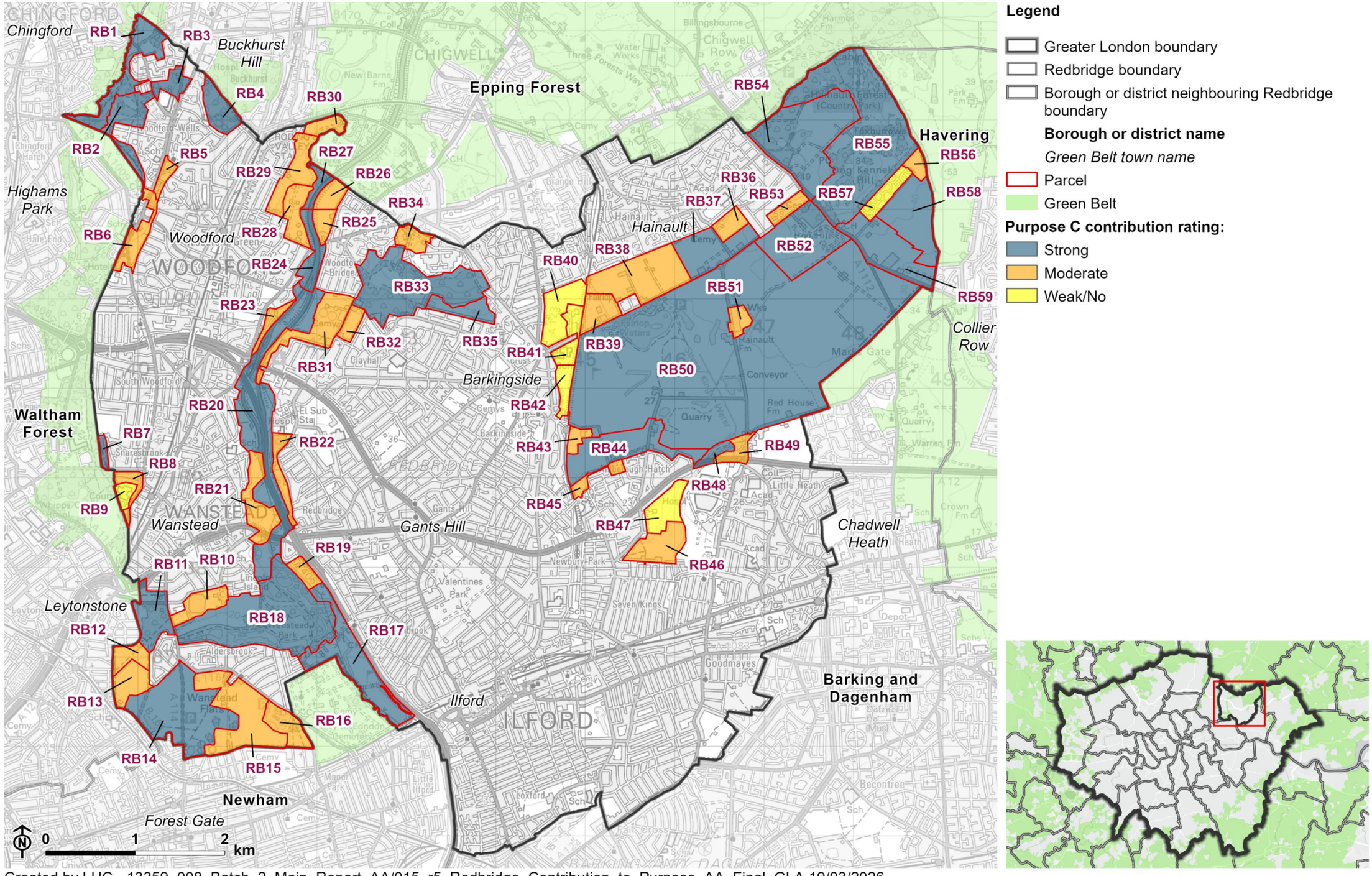
3.459 The vast majority of the areas of the borough Green Belt land is open countryside that has a strong sense of separation from urban areas and is not subject to any substantial urbanising influence. These areas make at least a strong contribution to this Green Belt purpose (parcels RB2-RB4, RB7, RB11, RB14, RB17, RB27, RB33, RB35, RB37, RB44, RB48, RB50, RB52, RB54, RB58 and RB59). Such locations are more vulnerable to encroaching impacts on the wider countryside. These wider impacts are particularly acute where release and development within parcels risks severing areas of open countryside, isolating them within the urban area. This risk is greatest in the narrowest portions of the green wedges in the west of the borough broadly comprised of the remnants of Waltham Forest, which is part of Epping Forest (RB1) and the shallow valley of the River Roding (parcels RB18, RB20 and RB24). These parcels make a strong contribution to Purpose C. Parcel RB55 also makes a strong contribution to Purpose C by virtue of its particularly strong association with the open countryside. Its high wooded slopes have notable separation from the urban areas in the borough, generally screened by thick woodland or facing out away from them.

3.460 Green Belt land that is particularly developed (parcels RB9, RB41 and RB57) and/or contained and urbanised by the surrounding urban area (parcels RB40, RB42 and RB47) make a weak/no contribution to Purpose C.

3.461 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more contained by urban areas but is still generally open and sufficiently distinct that development would represent encroachment into the countryside. Other areas may be open but have land uses associated with the urban area rather than the open countryside, such as sports playing fields, cemeteries and allotments and have limited relationship with the wider countryside such that development would not have a wider encroaching influence.

3.462 Figure 3.105 illustrates the variations in contribution to Purpose C across Redbridge.

Figure 3.105: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.463 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to 15 settlements large enough to be considered towns in Green Belt terms – Barkingside, Buckhurst Hill, Chadwell Heath, Chingford, Collier Row, Forest Gate, Gants Hill, Hainault, Highams Park, Ilford, Leytonstone, Loughton, Woodford, Wanstead, and Walthamstow.

3.464 Within these urban areas there are a number of conservation areas, the majority of which are located deep within the large built-up urban area and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt. These areas tend to be focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points). Some other conservation areas in neighbouring authorities are located some distance from Redbridge (e.g. Loughton) meaning Green Belt land in Redbridge makes little to no contribution their setting and special character.

3.465 Notable exceptions include the conservation areas located within Green Belt town areas that lie adjacent to and/or include areas of Green Belt land. These include:

- The **Forest Gate Town Centre Conservation Area** covers the historic core of the settlement. The town began as a hamlet on the edge of Epping Forest but then began to grow, with the coming of the railways from 1841, into an extensive Victorian suburb (including land to the east of the town centre, covered by **Woodgrange Estate Conservation Area**, **Durham Road Conservation Area** and **Romford Road Conservation Area**). Later maps show further development and the effects of wartime bombing and reconstruction. The town has a historic association with Wanstead Flats (which forms the southern extent of Epping Forest), to which this was an entrance (‘Forest Gate’). This forms part of the towns wider setting, with the linear north-south layout of Woodgrange Road/Woodford Road (A114) affording some distant views north to the southern edge of Wanstead Flats.
- The **Wanstead Village Conservation Area** covers the historic core of the settlement. In the Medieval and Early Post-Medieval Periods, Wanstead was a small sparsely populated rural parish on the edge of Epping Forest. Following the arrival of the railways in 1856 Wanstead grew rapidly during the second half of the nineteenth century (including Victorian and Edwardian development to the

east covered by **Wanstead Grove Conservation Area**). Despite this the area retains a strong village character today, with several green and open spaces and its core historic elements in a preserved state. The southern edge of the conservation area lies immediately adjacent to Wanstead Park (covered by **Wanstead Park Conservation Area** and the Grade II* **Wanstead Park Registered Park and Garden**), which lies within the Green Belt. St Mary's Avenue serves as a link between the park and Wanstead and its ancillary open green spaces. However, from the majority of the area there is limited visual connection with the Green Belt land to the south due to later surrounding development. The key views and vistas noted within the Wanstead Village Conservation Area Appraisal (2006) are internal, focussing along roads and across open spaces.

- Wanstead Park lies on the west side of the River Roding floodplain. It comprises the remains of formal gardens and landscape park dating from the late 17th century to early 19th century, located on the site of an earlier 16th century deer park. It is protected as the Grade II* Wanstead Park Registered Park and Garden and covered by **Wanstead Park Conservation Area**. The Wanstead Park Conservation Area Appraisal (2007) notes that 'closest settlement [to the park] is Wanstead to the north' with which it 'has close historic links', and 'to the south also lies the Edwardian residential suburb of Aldersbrook' (covered by **Aldersbrook and Lake House Conservation Area**). The conservation area appraisal notes that 'views from the park to the outside world are, owing to its enclosed character, and to the generally low relief, limited'. However, it does note an undesigned glimpsed view south towards the fleche of St. Gabriel's Church along Park Road in Aldersbrook, and a more expansive view east from the Long Walk towards the fleche of St. Andrew's on the Drive in Ilford. It also notes views from the southern end of the walk around the Ornamental Water looking east towards the tower of the Catholic Church on Wanstead Park Road (St John the Baptist Church) and the cupola of Highlands School.
- Aldersbrook is protected by the **Aldersbrook and Lake House Conservation Area** and comprises an Edwardian suburb that forms part of the wider suburban edge of Wanstead. It lies immediately south of Wanstead Park, north of Wanstead Flats and north-west of the City of London Cemetery (Grade I listed Registered Park and Garden). The Aldersbrook and Lake House Conservation Area Appraisal (2020) notes that 'views from the ends of streets in the Conservation Area towards and across these spaces are fundamental to the experience of the Conservation Area as a self-contained urban development in an otherwise open, green and undeveloped area'.
- Historically, Woodford was made up of three small and separate hamlets set within the vast expanse of the Epping Forest: Woodford Bridge, Woodford

Green and Woodford Wells. Today these historic parts of Woodford are protected by **Woodford Bridge Conservation Area, Woodford Green Conservation Area, Woodford Wells Conservation Area** and **South Woodford Conservation Area**. Woodford Bridge was the earliest of the three settlements, but by the twelfth century the principal manor house and parish church had moved to higher ground on the west side of the Roding valley. Woodford Bridge developed at a crossing point over the River Roding, with the settlement growing as traffic along the road increased. The historic core of the settlement is largely surrounded by later development, although retains some relationship with the valley of the River Roding to the west albeit the M11 severs this link somewhat. In addition, land within Claybury Park (protected by **Claybury Conservation Area**) to the south, whilst principally associated with the former Claybury Hall, forms a remnant part of the former forest landscape that originally surrounded the settlement, and includes Hospital Hill Wood/Claybury Wood thought to have been in existence since 1225. Woodford Green and Woodford Wells developed along a forest track (now the A104) to the west of Woodford Bridge. The settlement occupies a low ridge of land that slopes gently down towards the River Ching in the west and the River Roding in the east. The Woodford Green and Woodford Wells Conservation Area Appraisal (2007) states that the special interest of the area relates to several factors, including 'the long, semi-natural open spaces which form the heart of the area' and 'a village feel to the centre of the Conservation Areas and a semi-rural feel outside it'.

- Settlement in the Leyton area probably started in the Saxon period and remained largely rural until the construction of the Eastern Counties Railway between Stratford and Loughton in 1856, following which the area saw a rapid residential development. The historical part of the town centred on the 19th century parish church of St Andrew's is protected by **Leytonstone Conservation Area**. This area is located on the high ground at the eastern edge of the Lea Valley and immediately adjoining substantial surviving remnants of the great forest of Waltham, now Epping Forest. The Leytonstone Conservation Area Appraisal (2011) descries this forest-side position as 'an enduring characteristic of the area'. It also notes that 'extensive long views of all the Whipps Cross buildings are available from the sparsely treed forest land to the north east' but that 'the tree cover on the forest land to the north between Forest Glade and James Lane is … extensive right up to Forest Glade itself, and views are as a result very limited both into and out of the area'.

3.466 Based on the above, the following areas of the Green Belt land within Redbridge are considered to make a contribution to Green Belt Purpose D:

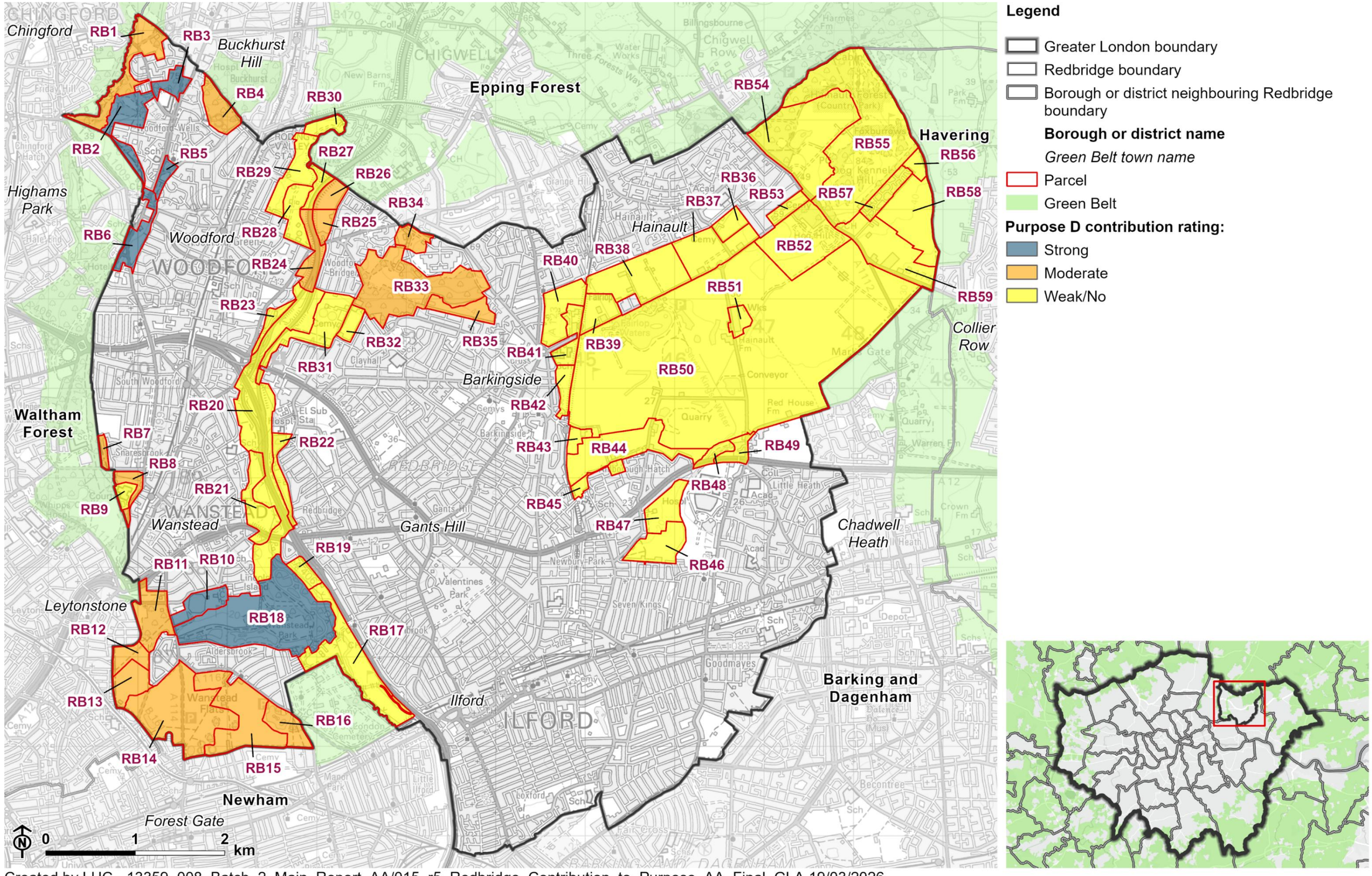
- Parts of Wanstead Flats to the south-west of the borough form part of the wider setting of Forest Gate such that they make a moderate contribution to its setting and special character (parcels RB14 and RB15), and form part of the wider setting to Wanstead (including Aldersbrook), making a moderate contribution to its setting and special character (parcels RB11, RB12, RB13, RB14, RB15 and RB16).
- Wanstead Park forms an important part of the open setting of Wanstead (including Aldersbrook), with some important views from and historic links to the town, making a strong contribution to its setting and special character (parcels RB10 and RB18).
- Claybury Park to the north of the borough is a remnant part of the former forest landscape which forms a wider open setting to the south of Woodford Bridge and makes a moderate contribution to its setting and special character (parcels RB33, RB34 and RB35). The valley of the River Roding also has a historic relationship with Woodford Bridge and forms an open setting to the west of the town, making a moderate contribution to its setting and special character (parcels RB24, RB25 and RB26).
- Open Green Belt land in the north-west of the borough forms part of the open setting at the heart of Woodford, making a strong contribution to its setting and special character (parcels RB2, RB3, RB5 and RB6), with areas that form a wider open setting to the town making a moderate contribution (parcels RB1 and RB4).
- Remnant parts of the great forest of Waltham (Epping Forest) within the west of the borough form part of the wider setting to the town of Leytonstone, making a moderate contribution to its setting and special character (parcels RB7 and RB8).

3.467 Other areas of the borough are considered to make a weak or no contribution to Purpose D. It is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.468 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.469 Figure 3.106 illustrates the variations in contribution to Purpose D across Redbridge.

Figure 3.106: Contribution to Purpose D – Preserve the setting and special character of historic towns



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Potential grey belt in the London Borough of Redbridge

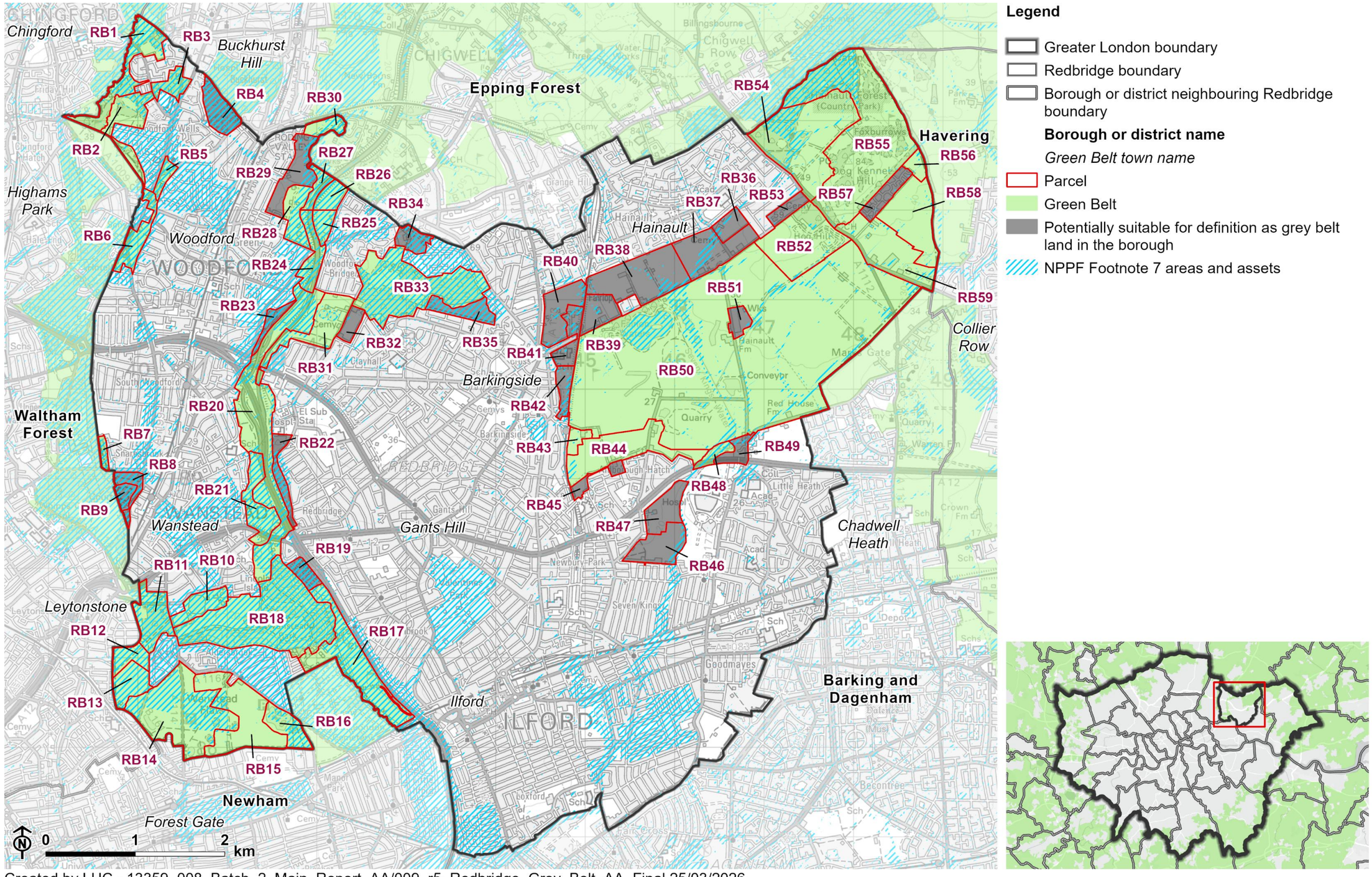
3.470 Having regard to the definition set out in the NPPF, the following areas of Redbridge are defined as having potential for definition as grey belt land subject to further work by the borough:

- Knighton Wood wholly within the borough's urban area north of Woodford Wells (RB4).
- Snaresbrook Crown Court (RB9) and the open woodland and Eagle Pond contained between it and the wider countryside (RB8).
- Royston Gardens and allotments east of the River Roding (RB19).
- Land in between Roding Lane South and the River Roding (RB22) retained by the river and the A406 beyond and punctuated by pockets of urbanising development.
- Land in between Chigwell Road and the M11 (RB23) retained by the motorway and containing the Chigwell Road Reuse and Recycling Centre.
- Bancroft and Whitbreads sports grounds west of the River Roding (parcel RB29).
- Urbanising development along Becket Close and Fitzherbert Close and the open contained land to the south-east of Roding Lane North Road (RB32).
- Contained land within Repton Park east and west of Regents Drive (RB34).
- South-eastern corner of Claybury Park comprised of the lower slope and grassland (RB35).
- Land north of Forest Road south Fairlop and Hainault (parcels RB36-RB41) punctuated by pockets of urbanising development and urbanised and contained by the urban area to the north, east and west.
- Avanti Court Primary School and King Soloman High School and associated playing fields contained within the urban area of Barkingside/Fulwell Cross and retained by the treelined railway line to the east (parcels RB41 and RB42).
- Land north of Aldborough Hatch (parcels RB43 and RB45) punctuated by pockets of urbanising development and urbanised and contained by the urban area to the west and south.
- Fords Sports Ground and Seven Kings Park wholly within the borough's urban area (parcels RB46 and RB47).

- The small residential estate along St James Gardens and the land immediately to the north and west which partially contained by the urban area and retained by treelined brooks to the north (parcels RB48 and RB49).
- Forest Park Cemetery and Crematorium (RB53) contained by the urban area and retained by Hog Hill to the south and Romford Road to the north-east.
- The large residential estate along Five Oaks Lane (RB57).

3.471 Figure 3.107 illustrates the area potentially suitable for definition as grey belt land within Redbridge.

Figure 3.107: Green Belt land potentially suitable for definition as grey belt land



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Highest and lowest contributing Green Belt land

3.472 The majority of the Green Belt in Redbridge makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include:

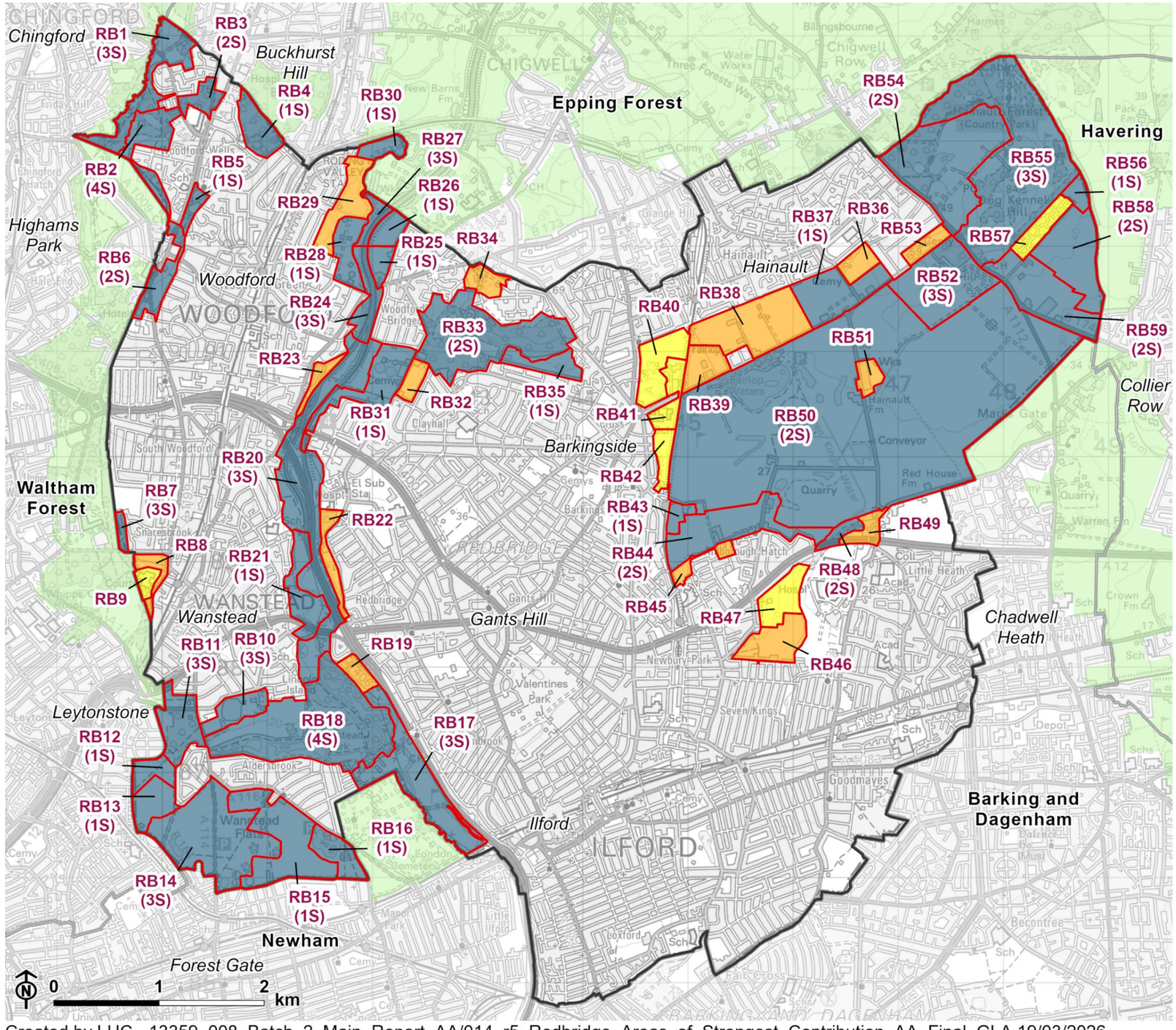
- The most open and often well treed green wedges in the west of the borough broadly comprised of the remnants of Waltham Forest, which is part of Epping Forest (parcels RB1, RB2 and RB7) and the shallow valley of the River Roding (parcels RB20, RB26 and RB27). These parcels make a strong contribution to purposes A, B and C. Wider open parts of the important gaps also make a strong contribution to Purpose B (parcels RB5, RB6, RB21, RB25, RB26, RB28 and RB31) and Purpose D (parcels RB2, RB3, RB5 and RB6).
- The open Wanstead Park, Wanstead Flats and the neighbouring wooded floodplain of the River Roding in the south-western corner of the borough generally make at least a strong contribution to Purpose B (parcels RB10, RB12, RB13, RB15 and RB16) but the most open and well treed parcels make a strong contribution to Purpose B and a strong contribution to purposes A and C also (parcels RB11, RB14 and RB17). Parcel RB18 makes a strong contribution to purposes C and D. Parcel RB10 also makes a strong contribution to Purpose D.
- Outside of the main green corridors into the urban area of the borough, Knighton Wood (parcel RB4) and Reeds Wood (parcel RB3) and Claybury Park (parcels RB33 and RB35) represent the largest open spaces within the urban area and make a strong contribution to Purpose C.
- The vast majority of the open countryside and lest contained south of Hainault, containing Fairlop Waters Country Park and the open fields and woodland to the south and west makes a strong contribution to purposes A and C (RB50), and other slightly more contained and urbanised parcels immediately to the north and south still make a strong contribution to Purpose C (parcels RB37, RB44 and RB48).
- The open and often wooded high ground in the north-east of the borough make at least a strong contribution to purposes A and C (parcels RB52, RB54 and RB59). The wooded slopes immediately north-west and south east of the housing estate along Five Oaks Lane make a strong contribution to Purpose A. Parcels RB52 and RB55 also make a strong contribution to Purpose B and Parcel RB56 also makes a strong contribution to Purpose A.

3.473 The areas within Redbridge that contribute the least to the Green Belt purposes are already largely developed (parcels RB9, RB41 and RB57) or

significantly contained and urbanised by neighbouring urban areas such that they have no notable relationship with the wider open countryside (parcels RB40, RB42 and RB47). All these parcels make no more than a weak/no contribution to the Green Belt purposes.

3.474 Figure 3.108 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.108: Highest contribution to NPPF Green Belt purposes



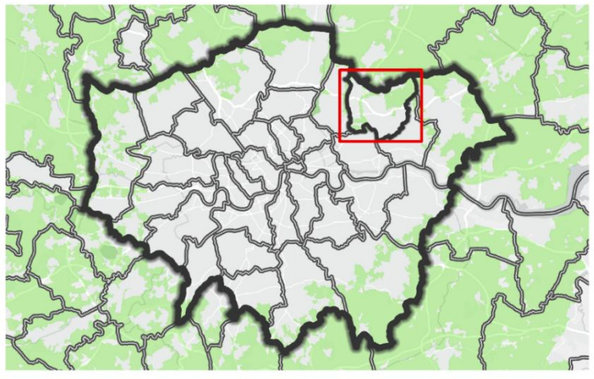
Legend

- Greater London boundary
- Redbridge boundary
- Borough or district neighbouring Redbridge boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.475 In light of the scale and contiguity of Green Belt land in Redbridge and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development north east of Hainault across the Hainault Forest Country Park and the wooded slopes of Cabin Hill and Dog Kennel Hill or north west of Collier Row across the wooded slopes of Dog Kennel Hill and Willoughby's Hill merging the large residential estate along Five Oaks Lane with the large built up area of Greater London would have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Chingford/Highams Park and Woodford.
  - Wanstead/Woodford and Gants Hill/Barkingside/Hainault (via Redbridge or Woodford Bridge).
  - Forest Gate, Gants Hill, Illford (via Manor Park), Leytonstone or Wanstead with one another or with Aldersbrook. Although Aldersbrook is not a town in its own right, its merging with the urban areas to the north, south, east or west would significantly narrow the gap between these neighbouring towns.
- Release or development of the vast majority of all the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release or development of the open Green Belt within and in the immediate setting of the Wanstead Park Conservation Area (parcels RB10 and RB18) and Woodford Green Conservation and Woodford Wells Conservation Area (parcels RB2 and RB3 and RB5 and RB6) would likely have a fundamental impact on Purpose D.

Richmond

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.476 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

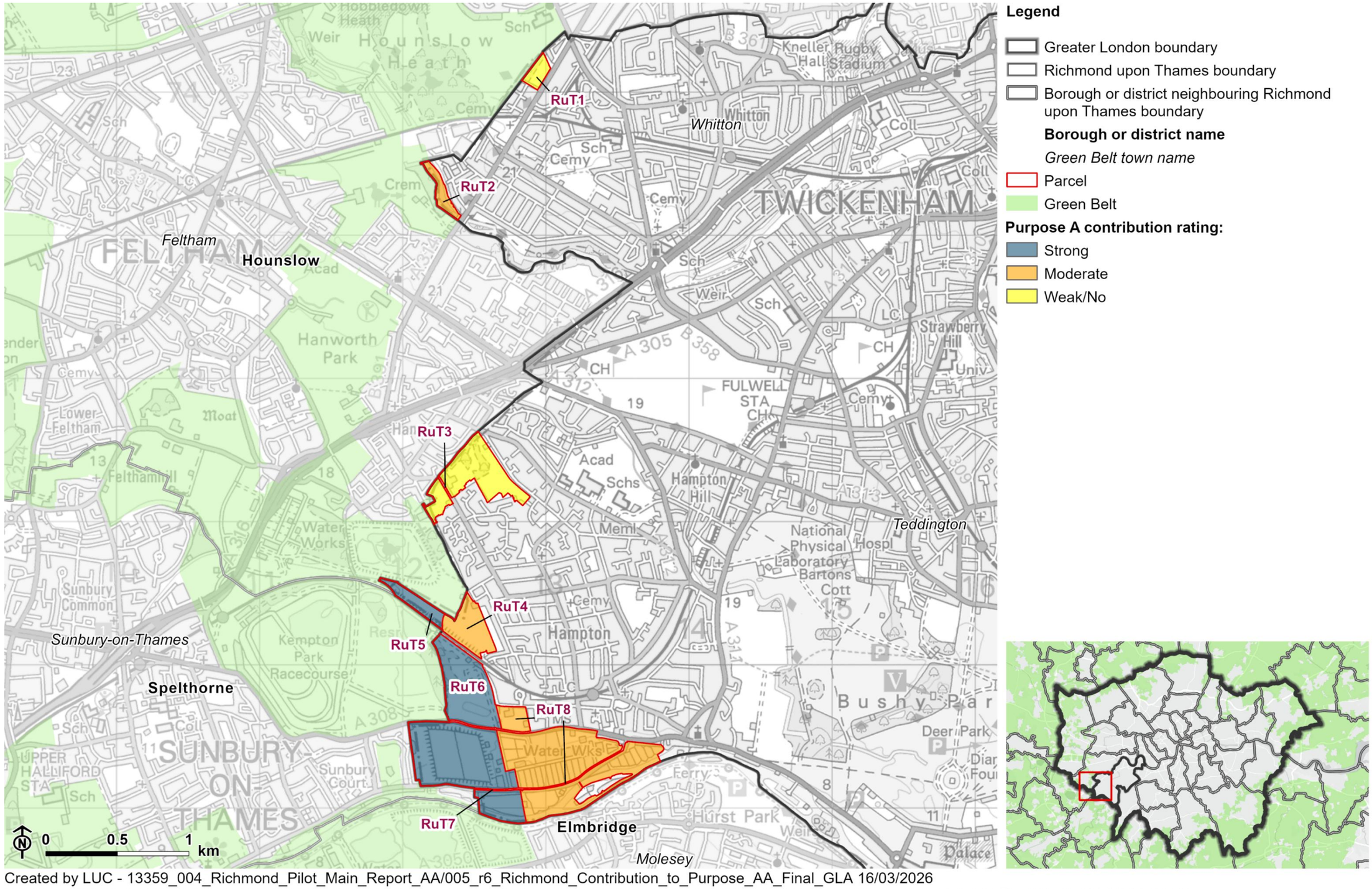
3.477 Those areas that make a strong contribution are located near to the west of Hampton, lying between it and Sunbury-on-Thames (parcels RuT5, RuT6 and RuT7). These open areas either do not directly abut and urban edge, or are heavily wooded, and therefore have a strong sense of separation from the urban area with no notable urbanising influence from it. The development of these areas would have an incongruous impact on the urban pattern by extending Hampton to the west and reducing the sense of separation from Sunbury-on-Thames.

3.478 Those areas that lie between Hampton and Sunbury-on-Thames and between Whitton and Feltham (within the neighbouring London Borough of Hounslow) where the land is more contained with a reduced sense of separation from urban areas, but are still generally open and sufficiently distinct from the large built up area that development would represent sprawl. These areas therefore make a more moderate contribution to Purpose A (parcels RuT2, RuT4 and RuT8).

3.479 Green Belt land that is particularly contained and urbanised by the surrounding urban area make a weak/no contribution to Purpose A, such as Hampton Common (RuT3) and Hounslow Heath Open Space (RuT1).

3.480 Figure 3.109 illustrates the variations in contribution to Purpose A across Richmond.

Figure 3.109: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.481 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

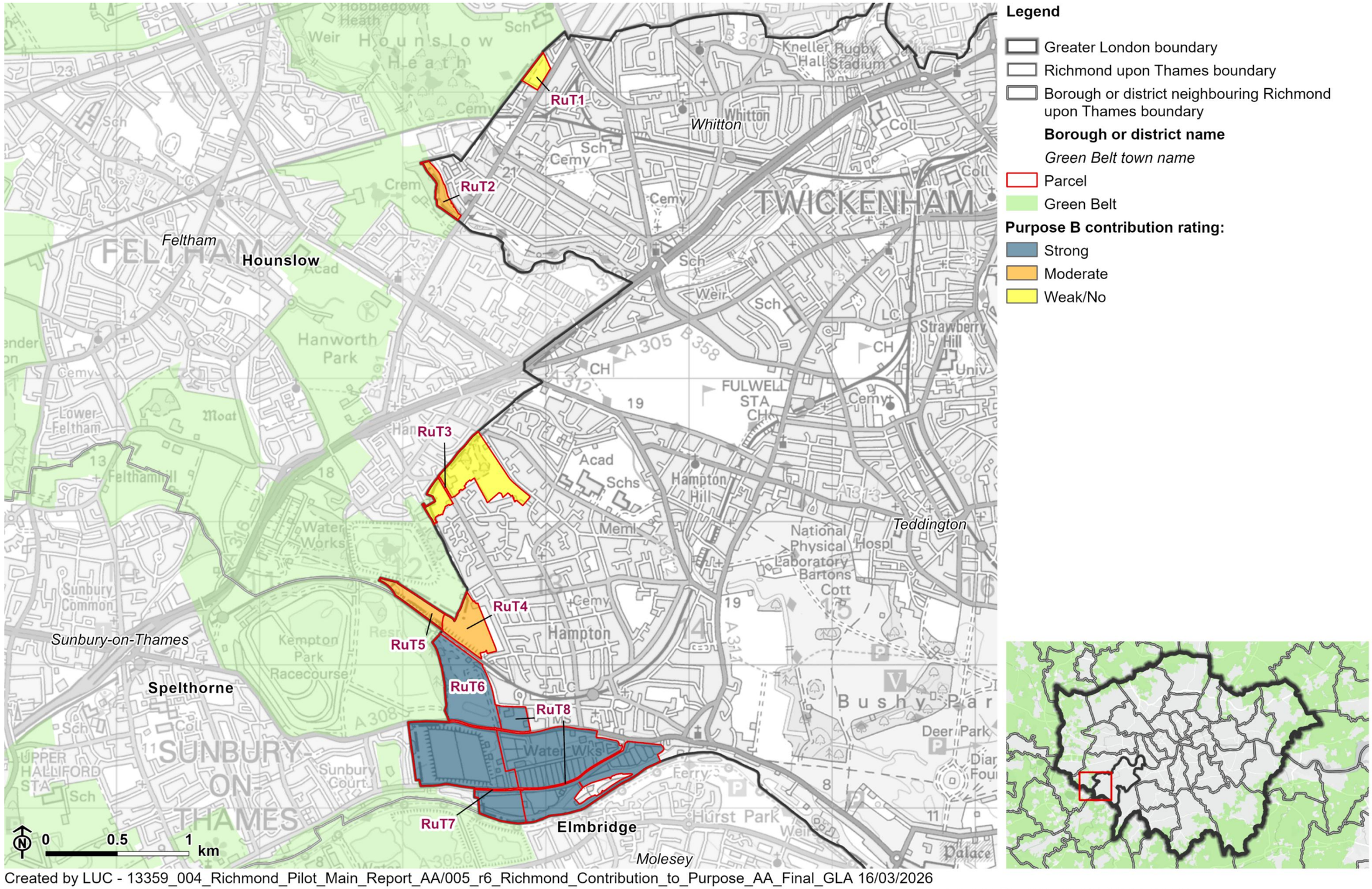
3.482 The areas of land that make a strong contribution to this purpose are located in, and form a significant part of, the fragile gap between the towns of Teddington and Whitton (via Hampton) and Sunbury-on-Thames and Moseley (parcels RuT6, RuT7 and RuT8). This area, whilst containing urbanising development (including infrastructure associated with Hampton Water Treatment Works), forms a substantial part of the remaining gap and plays a key role in maintaining what remains of the visual separation between the towns.

3.483 Land that makes a moderate contribution lies to the west of Whitton and east of the River Crane in between Feltham and Witton (RuT2) and west of Hampton peripheral to the fragile gap between Teddington (via Hampton) and Sunbury-on-Thames and Feltham (RuT4 and RuT5). There would be the potential for some development in these areas without losing visual separation between the towns.

3.484 Land that is contained by urban development at Hampton Common and Hounslow Heath Open Space and peripheral to gaps make a weak contribution to Purpose B (RuT1 and RuT3).

3.485 Figure 3.110 illustrates the variations in contribution to Purpose B across Richmond.

Figure 3.110: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.486 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

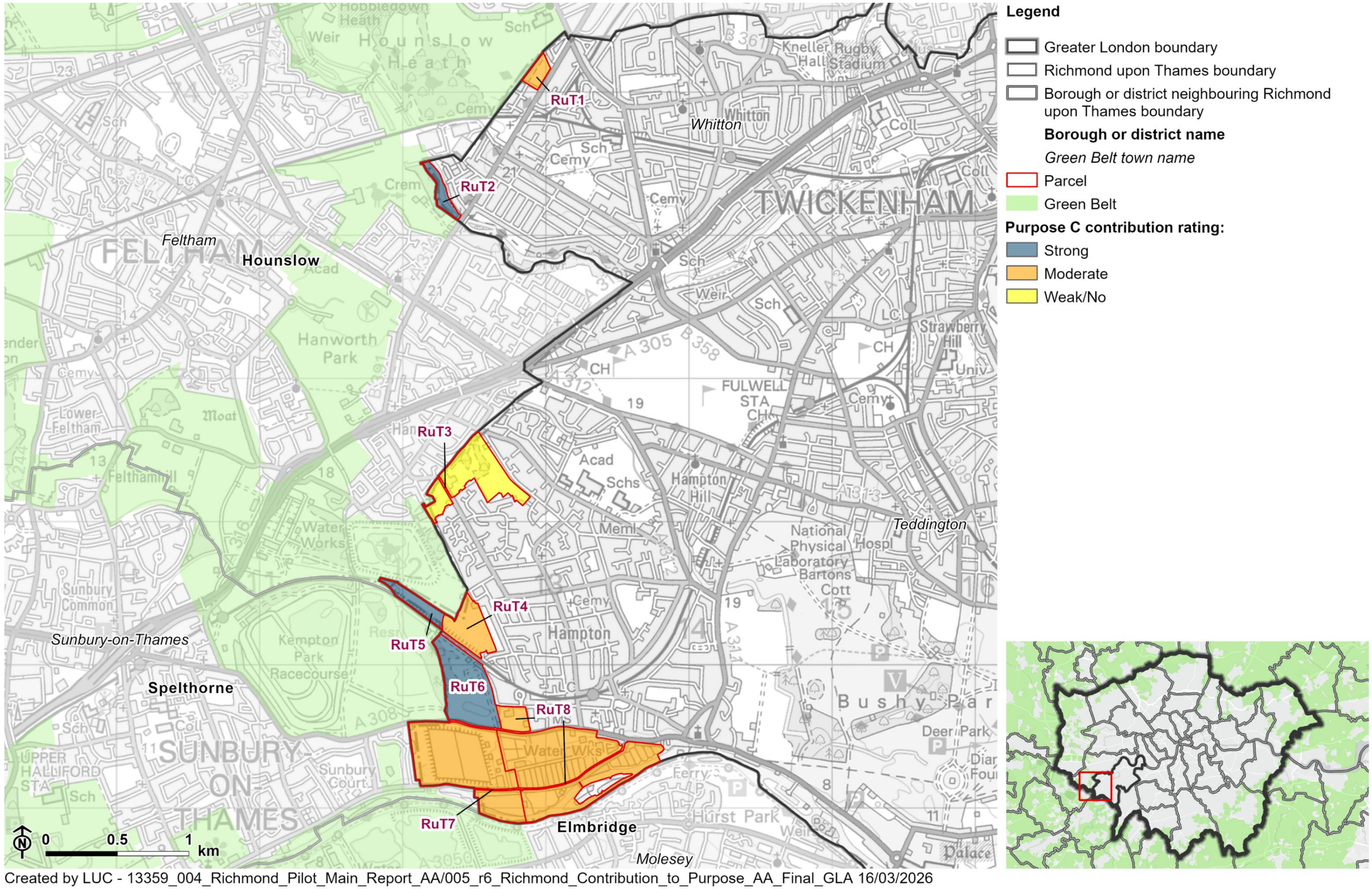
3.487 Areas to the west of Hampton (RuT5 and RuT6) and along the River Crane to the west of Whitton (RuT2) make a strong contribution to Purpose C. These areas comprise open countryside that has a strong sense of separation from the urban areas and is not subject to any substantial urbanising influence.

3.488 Some areas make a moderate or weak contribution to Purpose C by virtue of one, or a combination, of the following:

- Their land use, which is appropriate in the Green Belt, but is more associated with the urban area. For example, Hatherop Park and Hatherop Road Allotments to the west of Hampton (RuT4; Hampton Common and associated playing fields (RuT3); and land associated with Hampton Water Treatment Works (parcels RuT7 and RuT8).
- Their containment by the urban edge or other urbanising development. For example Hounslow Heath Open Space RuT1), Hampton Common (RuT3) and the Green Belt land next to the River Thames between Hampton and Molesey (parcels RuT7 and RuT8).

3.489 Figure 3.111 illustrates the variations in contribution to Purpose C across Richmond.

Figure 3.111: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.490 A review of relevant historic designations within and adjacent to the borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the borough contains and lies adjacent to six settlements large enough to be considered towns in Green Belt terms: Whitton, Teddington, Staines-upon-Thames, Sunbury-on-Thames, Molesey and Feltham.

3.491 Within these urban areas there are a number of conservation areas. In most cases the conservation areas are focused internally on historic buildings and spaces, with the surrounding Green Belt not contributing to their setting or special character. Many are also located deep within the large built-up urban area and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt. Some other conservation areas comprise former village centres (e.g. Hampton Village) which, whilst now lying within a town, have special interests relating to their village character and are therefore not considered relevant to the setting and special character of a historic town.

3.492 Policy 31 in the adopted Local Plan (2025) designate several views and vistas, including the following that have a relationship with Green Belt land:

- Shakespeare's Temple (Garrick's Villa) (A1.1).
- Hampton Court Road / Thames Street (A308) towards Hurst Park (east) (A1.3).
- Platt's Eyot pedestrian bridge (A3.1).

3.493 However, these views relate to the setting of Hampton Village Conservation Area and Platt’s Eyot Conservation Area (an island within the River Thames) and therefore do not contribute to the setting and significance of any historic towns (in Green Belt terms).

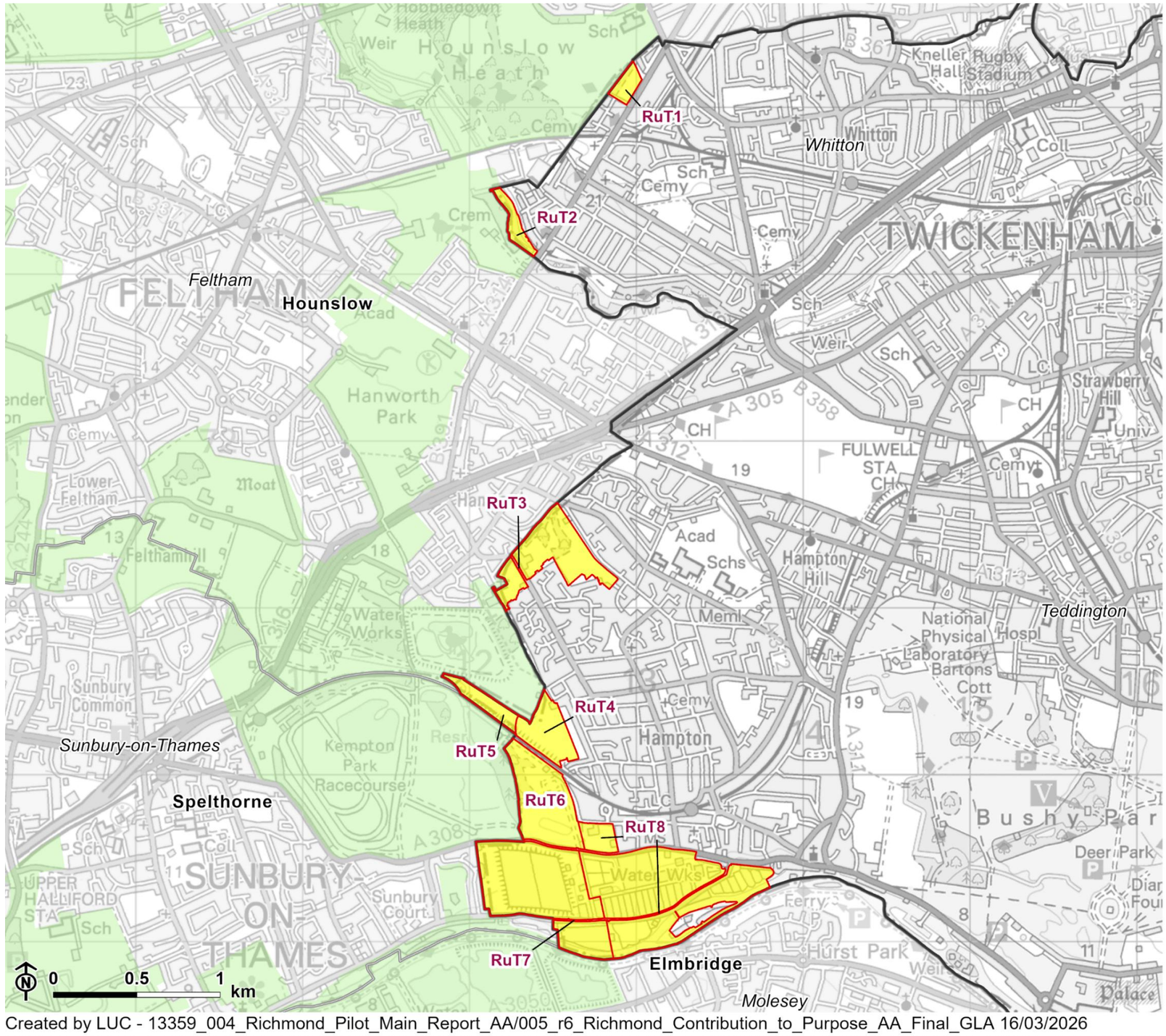
3.494 Based on the above, none of the Green Belt land within Richmond is considered to make a notable contribution to Green Belt Purpose D.

3.495 It is important to note that this conclusion does not mean that the Borough does not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.496 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.497 Figure 3.112 illustrates the variations in contribution to Purpose D across Richmond.

Figure 3.112: Contribution to Purpose D – Preserve the setting and special character of historic towns



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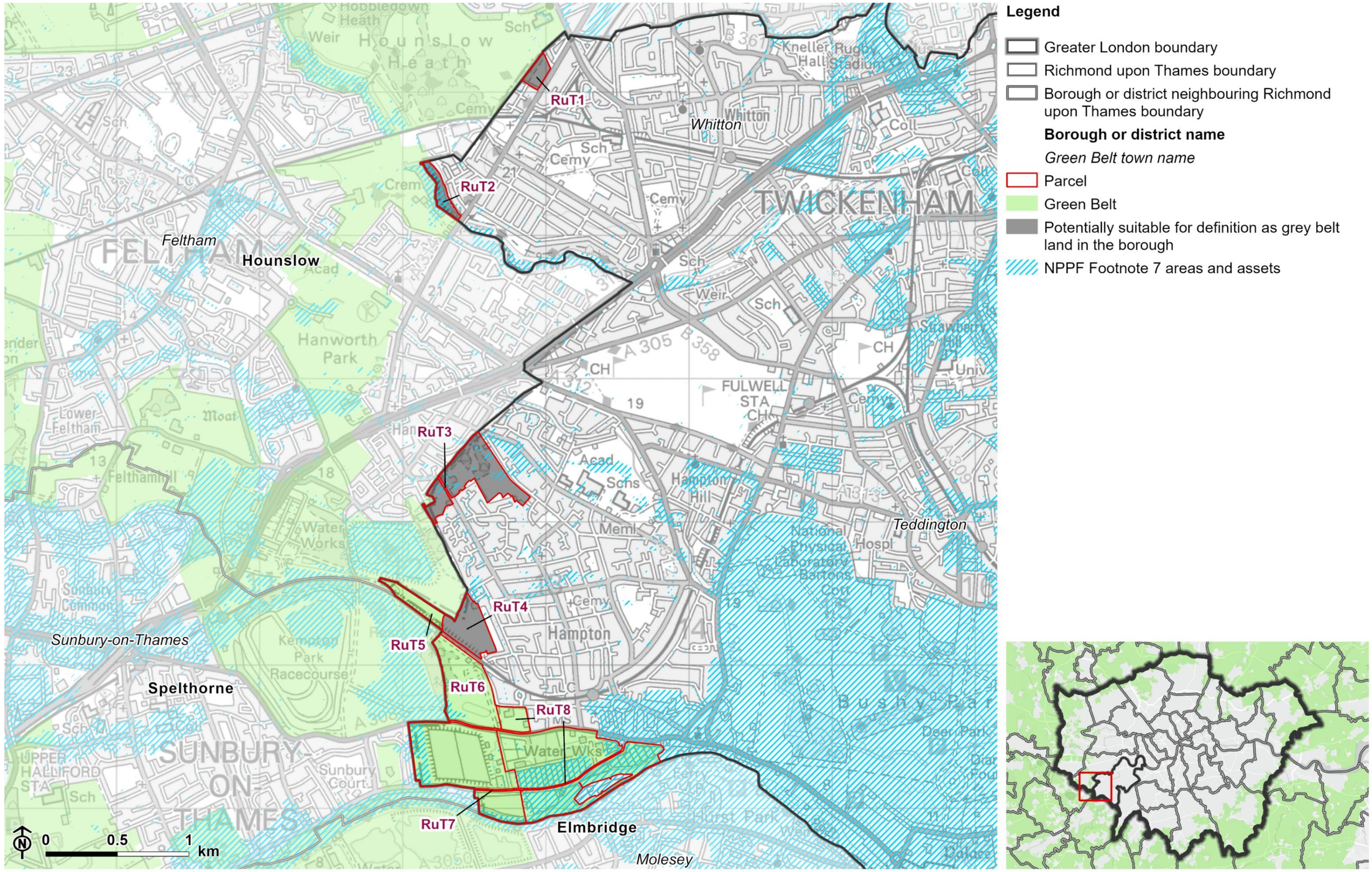
Potential grey belt in the London Borough of Richmond

3.498 Having regard to the definition set out in the NPPF, the following areas of Richmond are defined as having potential for definition as grey belt land subject to further work by the borough:

- Land within Hounslow Heath Open Space (RuT1).
- Land directly east of the River Crane between the Whitton and Feltham (RuT2).
- Land at Hampton Common and Oak Avenue Nature Reserve (RuT3).
- Land at Hatherop Park and Hatherop Road Allotments (RuT4).

3.499 Figure 3.113 illustrates the area potentially suitable for definition as grey belt land within Richmond.

Figure 3.113: Green Belt land potentially suitable for definition as grey belt land



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Highest and lowest contributing Green Belt land

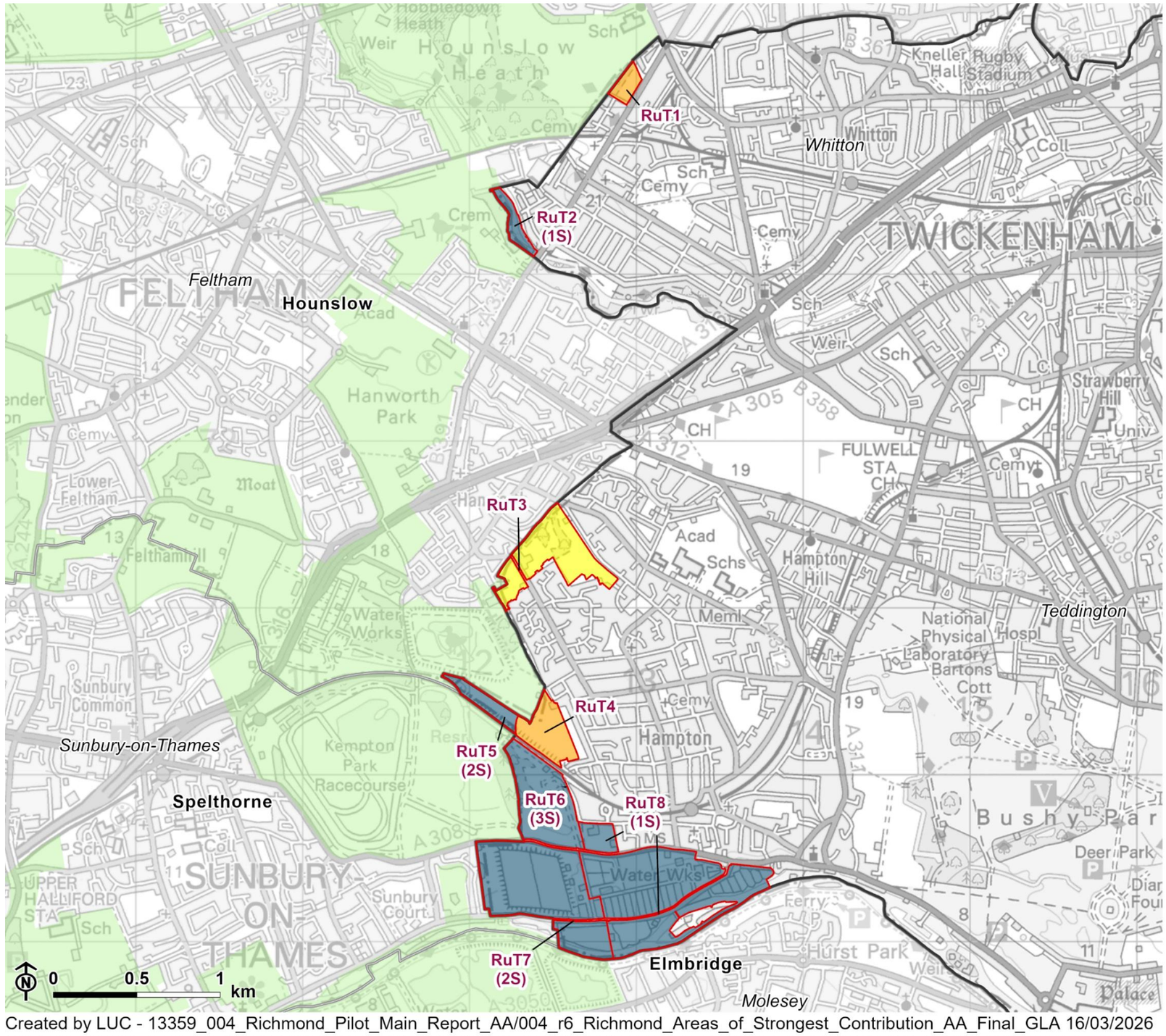
3.500 The majority of the Green Belt in Richmond makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include the open land:

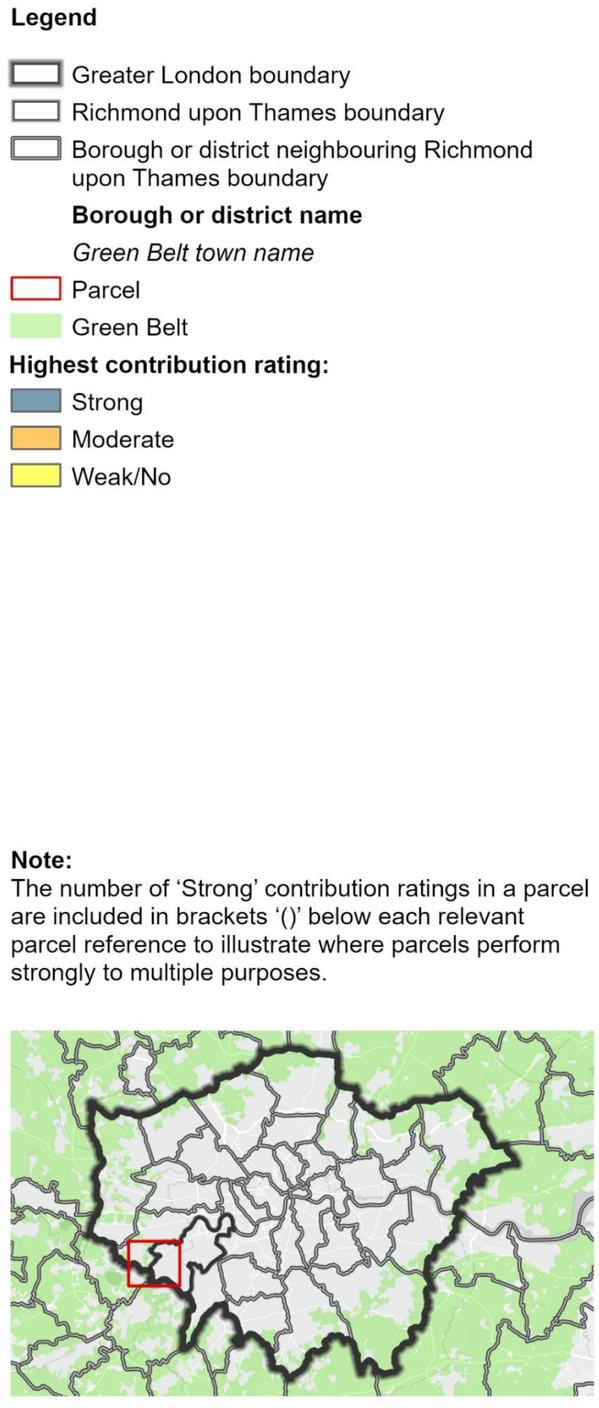
- To the west of Hampton, in areas with a strong sense of separation from the urban area (parcels RuT5 and RuT6). These areas make a strong contribution to purposes A and C.
- In the south west of the borough, along the valley of the River Thames between Hampton, Sunbury-on-Thames (within the neighbouring Spelthorne District) and Molesey (within the neighbouring Elmbridge District) (parcels RuT6, RuT7 and RuT8). These areas make a strong contribution to Purpose B.

3.501 The areas within Richmond that contribute the least to the Green Belt purposes are partially developed and contained pockets of Green Belt that are associated with adjacent urban areas, do not sit in notable Green Belt gaps between towns and are largely isolated from the wider open countryside. The following areas make no more than a weak/no contribution to the Green Belt purposes assessed here: the recreation grounds and urban parkland at Hampton Common (RuT3).

3.502 Figure 3.114 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.114: Highest contribution to NPPF Green Belt purposes





Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.

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Possible fundamental impacts to remaining Green Belt land

3.503 In light of the scale and contiguity of Green Belt land in Richmond and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with Sunbury-on-Thames and the wider contiguous and sprawling urban areas beyond would have a fundamental impact on Purpose A.
- Release or development that would result in the physical or perceived merging of Teddington and Whitton via Hampton with neighbouring Sunbury-on-Thames would have a fundamental impact on Purpose B.
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.

Sutton

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.504 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

3.505 The majority of land within Sutton makes a strong contribution to Purpose A being adjacent or near to the large built up area and either having a strong sense of separation from urban edges (parcels SU3, SU4, SU10, SU11, SU15, SU16, SU17, SU18, SU20, SU21, SU23 and SU25) and/or lacking physical features to restrict and contain development (parcels SU12, SU14, SU19 and SU22). Development in these locations would expand the large built up area into the open countryside and would therefore have a notable incongruous impact on the urban pattern. To the west, development of the Cuddington Golf Course would further reduce the sense of separation between Greater London and Banstead/Burgh Heath/Nork, with the risk of their merging increasing their combined sprawling influence.

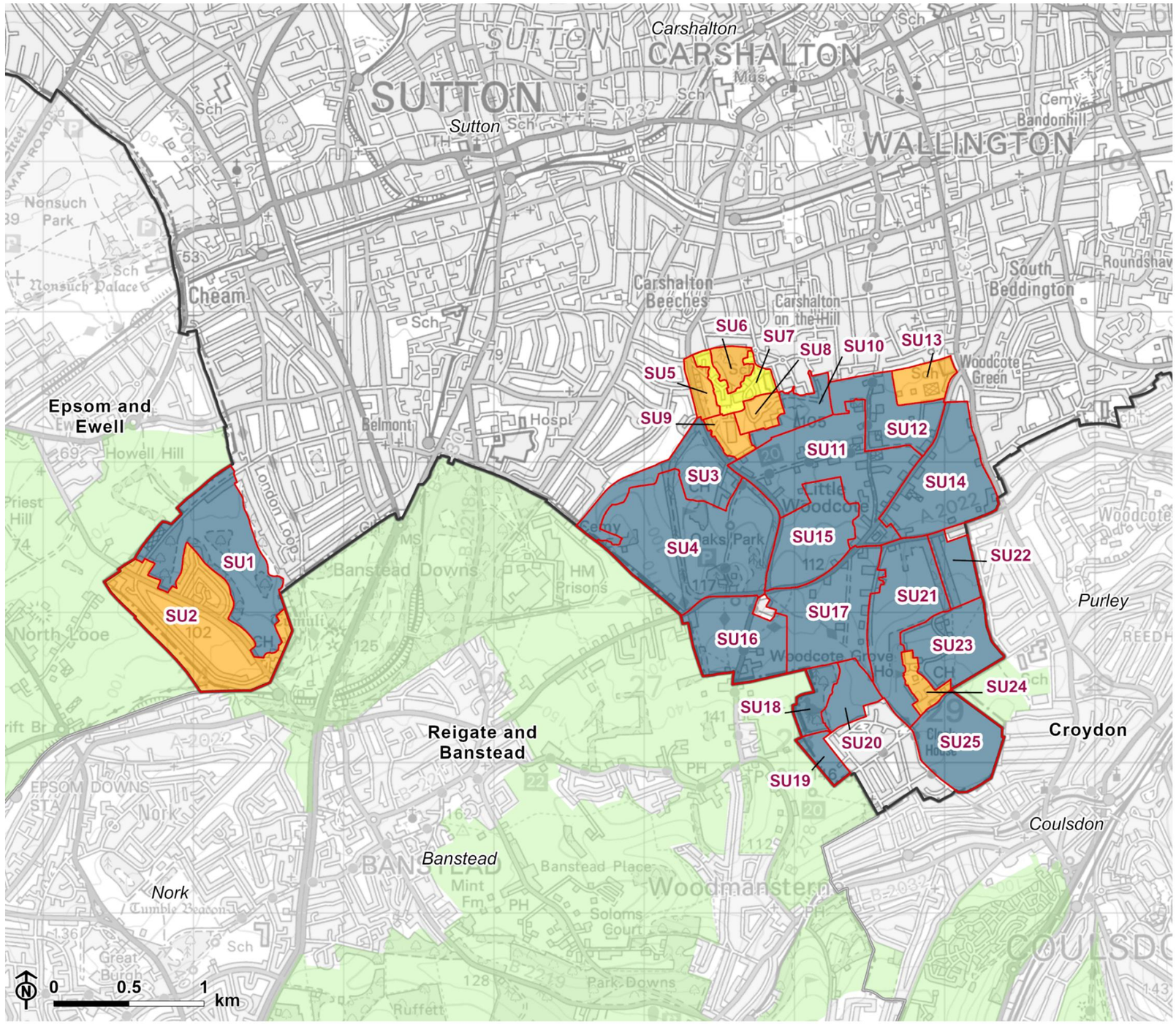
3.506 Where the land is more contained, has some notable relationship with the large built-up area be it through views of sparse development make a more moderate

contribution to Purpose A (parcels SU2, SU5, SU6, SU8, SU9, SU13 and SU24). Parcel SU2 contains a substantial area of development but it is generally well spread along Higher Drive and Banstead Road, maintaining some openness in between the linear residential streets and the sensitivity of the location in the narrow gap between Greater London and Banstead/Burgh Heath/Nork elevates its contribution to moderate.

3.507 Green Belt land that contains significant areas of development and is notably contained (SU7) makes a weak/no contribution to Purpose A.

3.508 Figure 3.115 illustrates the variations in contribution to Purpose A across Sutton.

Figure 3.115: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas

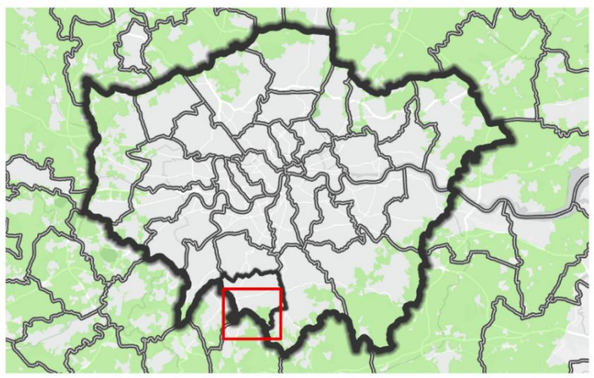


Legend

- Greater London boundary
- Sutton boundary
- Borough or district neighbouring Sutton boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Purpose A contribution rating:

- Strong
- Moderate
- Weak/No



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.509 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.510 The areas that make a strong contribution are the least urbanised, open and often well treed parcels in the narrowest and therefore most fragile gaps between neighbouring towns. Parcels that make a strong contribution to Purpose B include:

- Parcel SU1 makes a strong contribution to Purpose B, maintaining separation in a gap between Carshalton and Sutton (via Belmont and Carshalton Beeches) and Banstead/Burgh Heath/Nork, made more fragile by the development to the south.
- Parcels SU3 and SU4 make a strong contribution to Purpose B. They form substantial parts of a fragile gap between Carshalton and Sutton (via Carshalton Beeches) and Banstead/Burgh Heath/Nork (via ribbon of development along Croydon Lane and Carshalton Road), and their development would significantly impact visual separation.
- Parcel SU16 makes a strong contribution to Purpose B. It forms a substantial part of a fragile gap between Carshalton and Sutton (via Carshalton Beeches) and Coulston and Banstead (via ribbon of development along Croydon Lane and Carshalton Road). Development in the parcel would extend and almost merge the ribbon development along Croydon Lane and Carshalton Road which already significantly weaken the gap between Coulsdon and Banstead/Burgh Heath/Nork.
- Parcels SU11 and SU15 make a strong contribution to Purpose B. They form substantial parts of a moderate gap between Carshalton and Sutton (via Carshalton Beeches and Carshalton-on-the-Hill) and Coulsdon and Purley, and development in the parcels would significantly impact visual separation between towns.
- Parcels SU17, SU20 and SU21 make a strong contribution to Purpose B. They form substantial parts of a moderate gap between Carshalton and Sutton (via Carshalton Beeches and Carshalton-on-the-Hill) and Coulsdon and Purley. Development in the parcels would significantly impact visual separation between towns.
- Parcels SU18 and SU19 make a strong contribution to Purpose B. They form substantial parts of a fragile gap between Coulsdon and Banstead (via

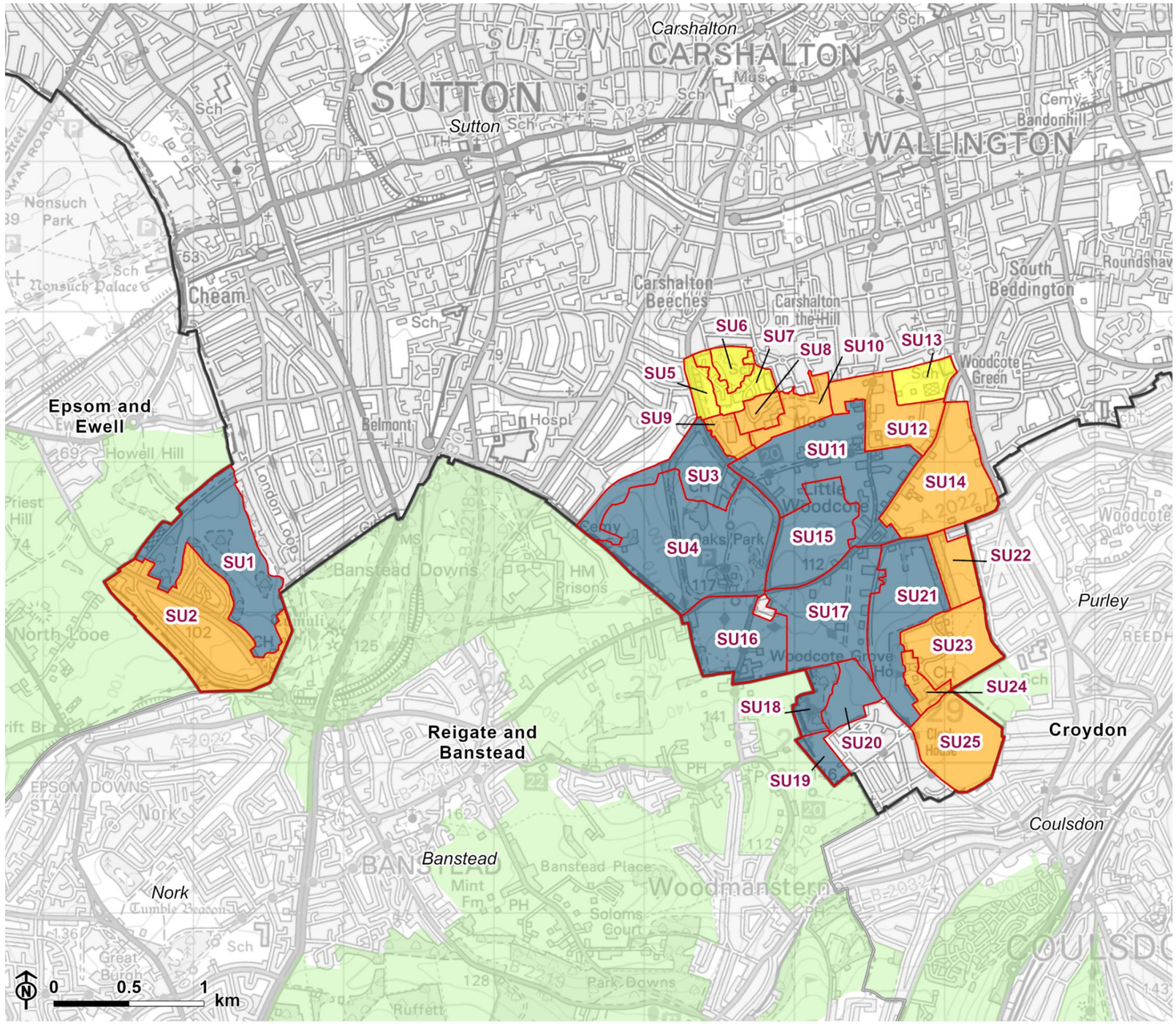
intervening development in Woodmansterne), and their development would significantly impact visual separation between towns.

3.511 Green Belt land that is particularly developed (parcels SU7 and SU13) and/or contained and urbanised by the surrounding urban area such that they are more peripheral to gaps between neighbouring towns (parcels SU5 and SU6) make a weak/no contribution to Purpose B.

3.512 The remaining areas make a moderate contribution to this purpose because they represent less substantial parts of the more moderate gaps between towns, by virtue of the wider nature of the gaps and/or being more contained or urbanised by urban areas. These areas are still generally open and sufficiently distinct that they still play some separating role between neighbouring towns (parcels SU8, SU9, SU10, SU12, SU14, SU22, SU23, SU24 and SU25). Parcel SU2 contains significant urbanising development but lies within a fragile gap separating the neighbouring towns of Carshalton and Sutton (via Belmont and Carshalton Beeches) and Banstead/Burgh Heath/Nork, elevating the significance of the limited remaining open land between dwellings to moderate.

3.513 Figure 3.116 illustrates the variations in contribution to Purpose B across Sutton.

Figure 3.116: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.514 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

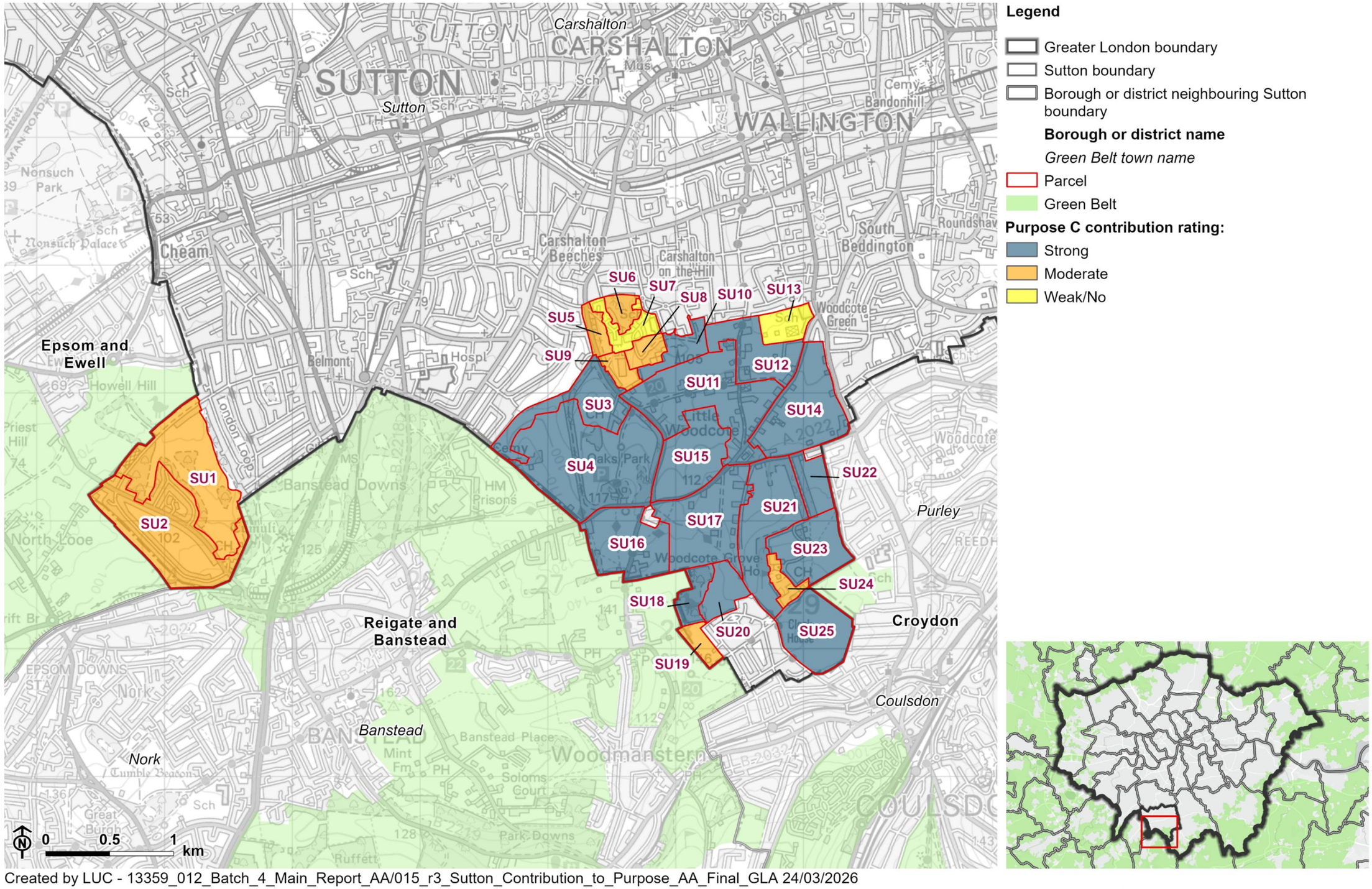
3.515 Large parts of the boroughs Green Belt land are comprised of open countryside that has a strong sense of separation from urban areas and is not subject to any substantial urbanising influence. Parcels SU4 and SU15 make a strong contribution to Purpose C as the areas of the boroughs Green Belt which have the least urbanising influences and strongest relationship with the wider open countryside. Several other parcels (parcels SU3, SU10, SU11, SU12, SU14, SU16, SU17, SU18, SU20, SU21, SU22, SU23 and SU25) make a strong contribution to Purpose C. In these locations views of the wider open countryside dominate and dilute any urbanising influence and/or woodlands serve to screen and check the urbanising influences in the countryside.

3.516 Green Belt land that contains significant areas of development (parcels SU7 and SU13) and are contained by the urban area sufficiently to limit their relationship with the wider countryside make a weak/no contribution to Purpose C.

3.517 The remaining areas (parcels SU1, SU2, SU5, SU6, SU8, SU9, SU19 and SU24) make a moderate contribution to this purpose for a range of reasons, such as where land is developed with some openness and relationship with the wider countryside and/or urbanised but still retains a relationship with the wider countryside; or where Green Belt land is open but has land uses associated with the urban area rather than the open countryside, such as sports playing fields; and/or where land is open but has limited relationship with the wider countryside such that development would not have a notably wider encroaching influence.

3.518 Figure 3.117 illustrates the variations in contribution to Purpose C across Sutton.

Figure 3.117: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.519 A review of relevant designations within and adjacent to the borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies adjacent to six settlements large enough to be considered towns in Green Belt terms – Banstead/Burgh Heath/Nork, Carshalton, Coulsdon (including Old Coulsdon), Epsom, Purley, and Sutton. These are explored below.

3.520 Banstead/Burgh Heath/Nork is a town in the borough of Reigate and Banstead to the south of Sutton. It remained a collection of rural village until the late 19th century when improved roads and the arrival of the railways led to its gradual growth and merging. The town is located on the North Downs chalk plain on a ridge of higher ground with the historic remnant village centre of the town protected by **Banstead Conservation Area**. The Banstead Conservation Area Appraisal (2014) states that the special interest of the area 'is as the remains of a traditional village'. However, the historic core of the town is located some distance from Green Belt land in Sutton to the north-east, and intervening built form limits any visual connection with land to the north-west.

3.521 Carshalton is a town, with a historic village centre protected by **Carshalton Village Conservation Area**. This historic area comprises open parkland of historical importance, including the grounds of the Carshalton House Estate and Grove Park, as well as notable buildings such as Honeywood Museum, The Lodge and the Old Rectory. The Carshalton Village Conservation Area Appraisal (2019) notes that the area is 'surrounded by typical 1913-39 housing, featuring medium density, terraced and semi-detached, two-storey housing'. This intervening built form means that there is no documented visual connection between the historic parts of the town and Green Belt within Sutton to the south. **Park Hill Conservation Area** lies to the south of Carshalton Village, although this area comprises more recent development along Park Hill and Wales Avenue. **Carshalton Park Conservation Area** lies to the south of Carshalton Village and covers the parkland and adjacent 1930s residential development along Ashcombe Road to the south.

3.522 Coulston lies on the edge of the North Downs within the neighbouring London Borough of Croydon and has a distinctive landscape setting of dry chalk valleys. **Bradmore Green Conservation Area** protects the historic core of Old Coulsdon, focused around the open spaces of Bradmore Green and Grange Park. However, the historic part of Coulston is located some distance from Green Belt land in Sutton to the north-west with intervening built form limiting any visual connection.

3.523 Epsom is a historic town in the borough of Epsom and Ewell to the south-west of Sutton. The **Epsom Town Centre Conservation Area** is a compact area covering the historic core of Epsom and most of its oldest buildings. Lying to the south of this is **Church Street Conservation Area** which also represents a part of the historic core of old Epsom around the late medieval church of St Martin's. The Epsom Town Centre Conservation Area Appraisal (2009) and the Church Street Conservation Area Appraisal (2010) both note that the landform of the area is flat and that 'there is very little sense of a surrounding landscape', as intervening buildings and trees prevent views out of the area. There is therefore limited to no visual connection between the historic core of Epsom and Green Belt land within Sutton to the east. To the north of Epsom town centre lies **Ewell Village Conservation Area**, which represents the historic parts of Ewell Village including the historic Bourne Hall Park and a notable collection of listed buildings. Similar to the Epsom historic core, the Ewell Village Conservation Area Appraisal (2009) notes that this remnant village core 'now lies within a built-up area'. This results in limited visual connection with surrounding countryside, including Green Belt land within Sutton to the east. There are several other conservation areas within Epsom which relate to later periods of development with generally suburban settings, such as **Ewell Downs Road**, **Higher Green**, **Lintons Lane**, **Providence Place**, **Pikes Hill**, **Burgh Heath Road**, **Downs Road Estate**, **Worple Road**, **College Road**, **Woodcote**, **Chalk Lane**, and **Stamford Green**.

3.524 Purley is not considered to be a historic town. The name Purley derives from an estate, mentioned in about 1200 when it was deeded to one William de Pirelea. It remained a small rural settlement until the 1920s and 1930s when it grew rapidly to provide homes in spacious green environments. One such development was the Webb Estate which was developed from farmland into over 220 Edwardian homes and landscaped gardens and is today protected today by the **Webb Estate and Upper Woodcote Village Conservation Area**.

3.525 Sutton originated as a highway-settlement at a major crossroads and turnpike in the 17th and 18th centuries, and then expanded dramatically following the arrival of the railways in the mid-19th century. The historic core of the town is protected today by **Sutton Town Centre Conservation Area**. The Sutton Town Centre Conservation Area Character Appraisal (2019) notes that the linear form of the High Street 'is experienced through long vista views and a distinctive sense of enclosure formed by continuous building lines of properties still aligned to historical plot boundaries either side of the road'. Whilst there are long views south along the High Street, intervening built form means that there is no documented visual connection between the historic core of the town and Green Belt within Sutton to the south-east. There are some other conservation areas within Sutton which relate to more recent areas of development, including **Grove Avenue**, **Landseer Road** and **Sutton**

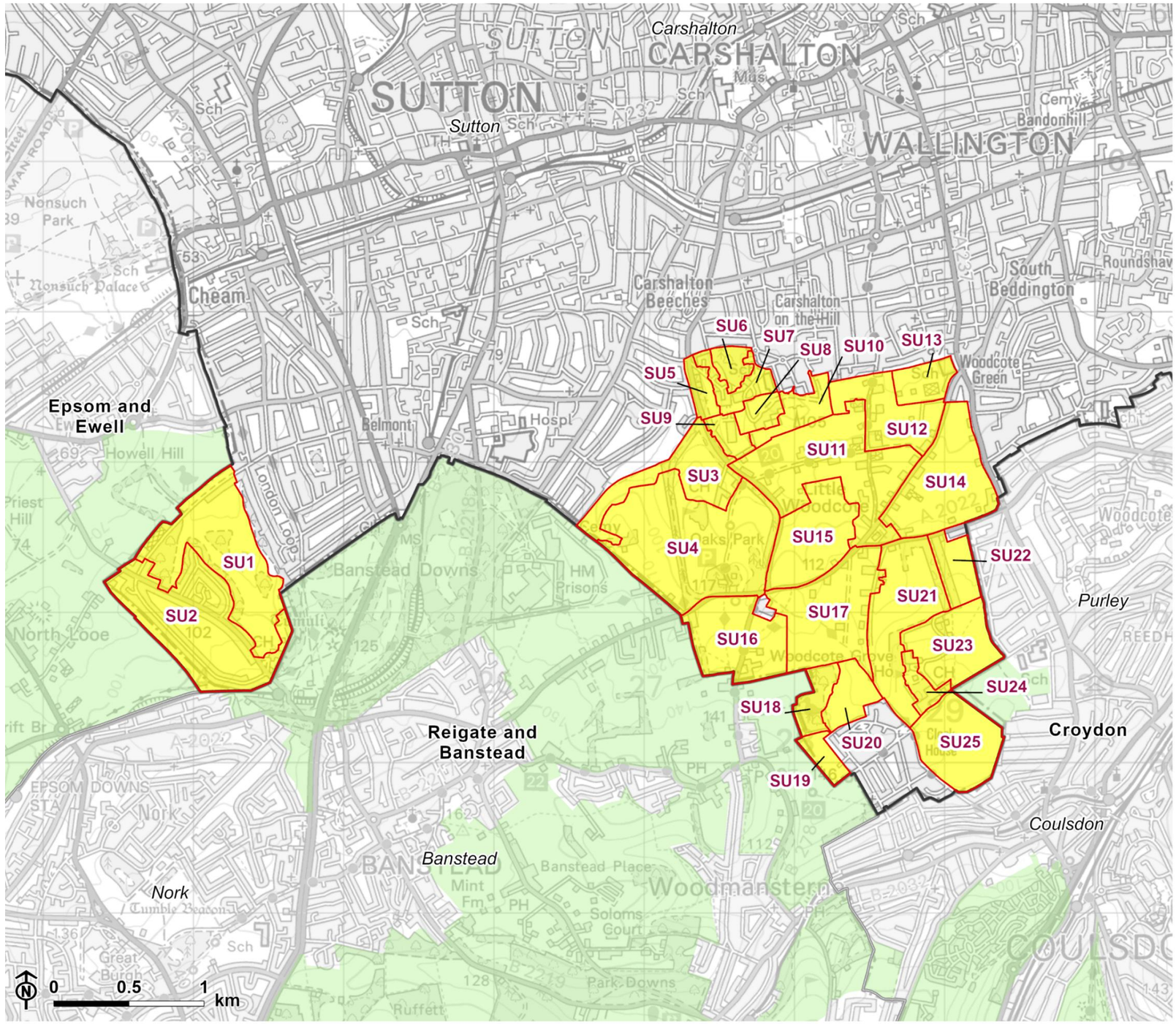
Garden Suburb. There are also a number of Areas of Special Local Character within Sutton. However, these cover more recent residential parts of the Borough within urban areas that are designated on the basis of their high quality townscape, architecture and landscape rather than any relationship with surrounding open land.

3.526 Based on the above, there are no areas of the Green Belt land within the borough considered to make more than a weak/no contribution to Green Belt Purpose D. However, it is important to note that this conclusion does not mean that other parts of the Borough do not have special and unique characteristics worthy of preservation, it is just that these characteristics are not directly relevant to an assessment of Green Belt Purpose D. Other Green Belt purposes seek to maintain openness of the countryside and maintain separation between towns, which may directly or indirectly contribute to preserving such special and unique local characteristics.

3.527 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.528 Figure 3.118 illustrates the variations in contribution to Purpose D across Sutton.

Figure 3.118: Contribution to Purpose D – Preserve the setting and special character of historic towns



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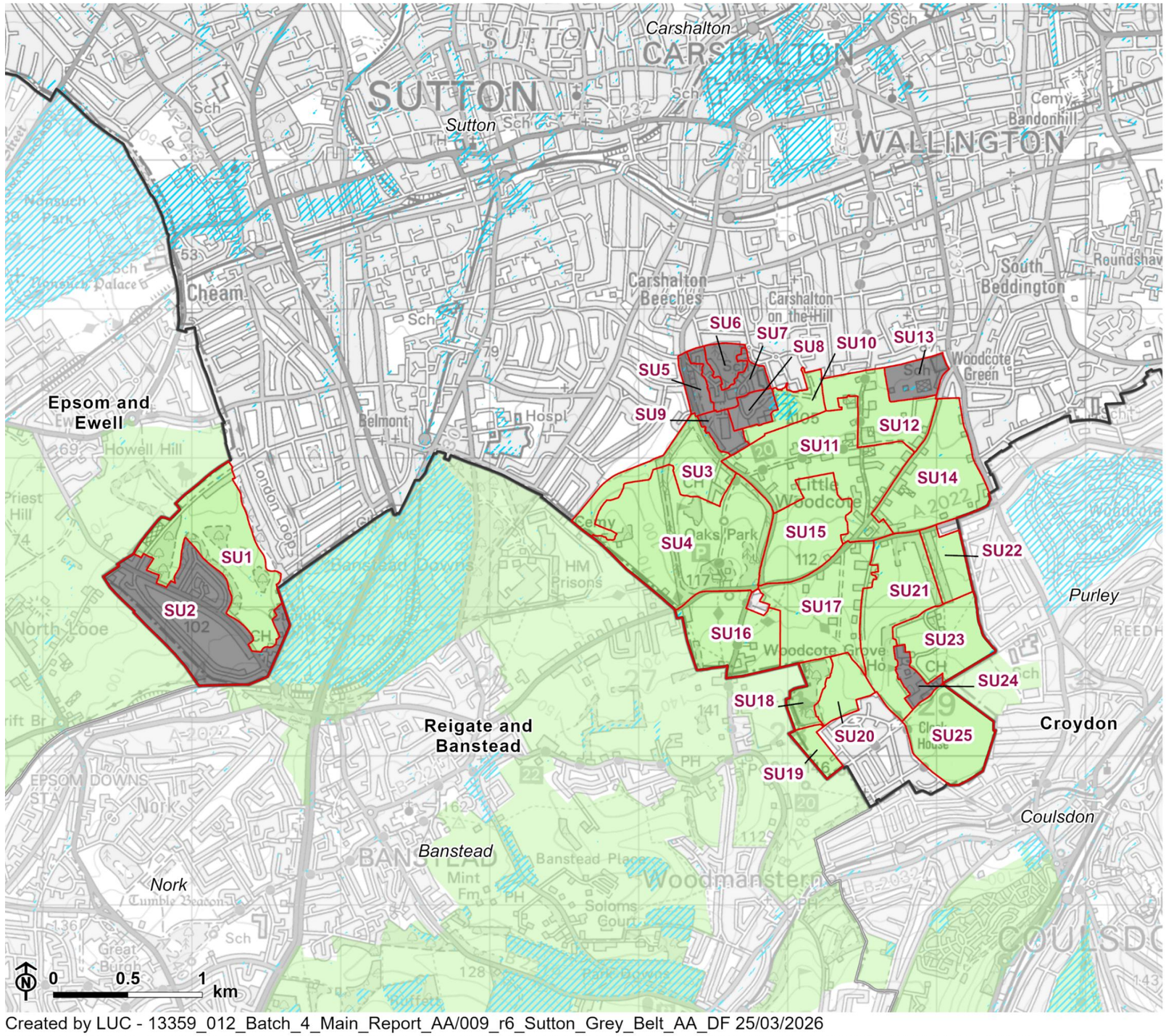
Potential grey belt in the London Borough of Sutton

3.529 Having regard to the definition set out in the NPPF, the following areas of Sutton are defined as having potential for definition as grey belt land subject to further work by the borough:

- The linear residential roads and the contained open land in between them south of Cuddington Golf Club (SU2).
- Notably contained open and/or developed land in between Carshalton Beeches and Carshalton on the Hill (parcels SU5, SU6, SU7 and SU9).
- Open sports pitches to the south of Carshalton Beeches and Carshalton on the Hill (SU8).
- Wallington High School for Girls and Dobbies Garden Centre Woodcote Green (SU13).
- The open field to the east of Woodcote Park Golf Club south of Little Woodcote Lane (SU22).
- The notable cluster of large buildings associated with Orford House and Woodcote Park Golf Club (SU24).

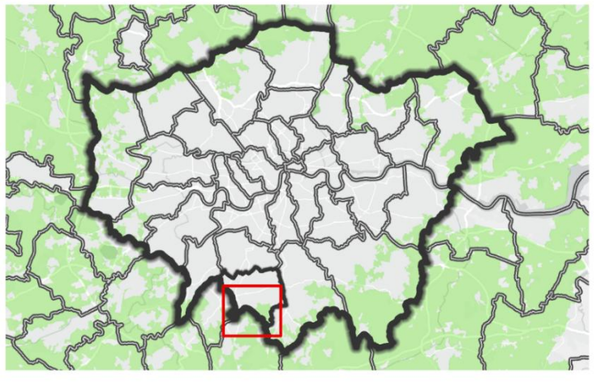
3.530 Figure 3.119 illustrates the area potentially suitable for definition as grey belt land within Sutton.

Figure 3.119: Green Belt land potentially suitable for definition as grey belt land



Legend

- Greater London boundary
- Sutton boundary
- Borough or district neighbouring Sutton boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets



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Highest and lowest contributing Green Belt land

3.531 The majority of Green Belt in Sutton makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include:

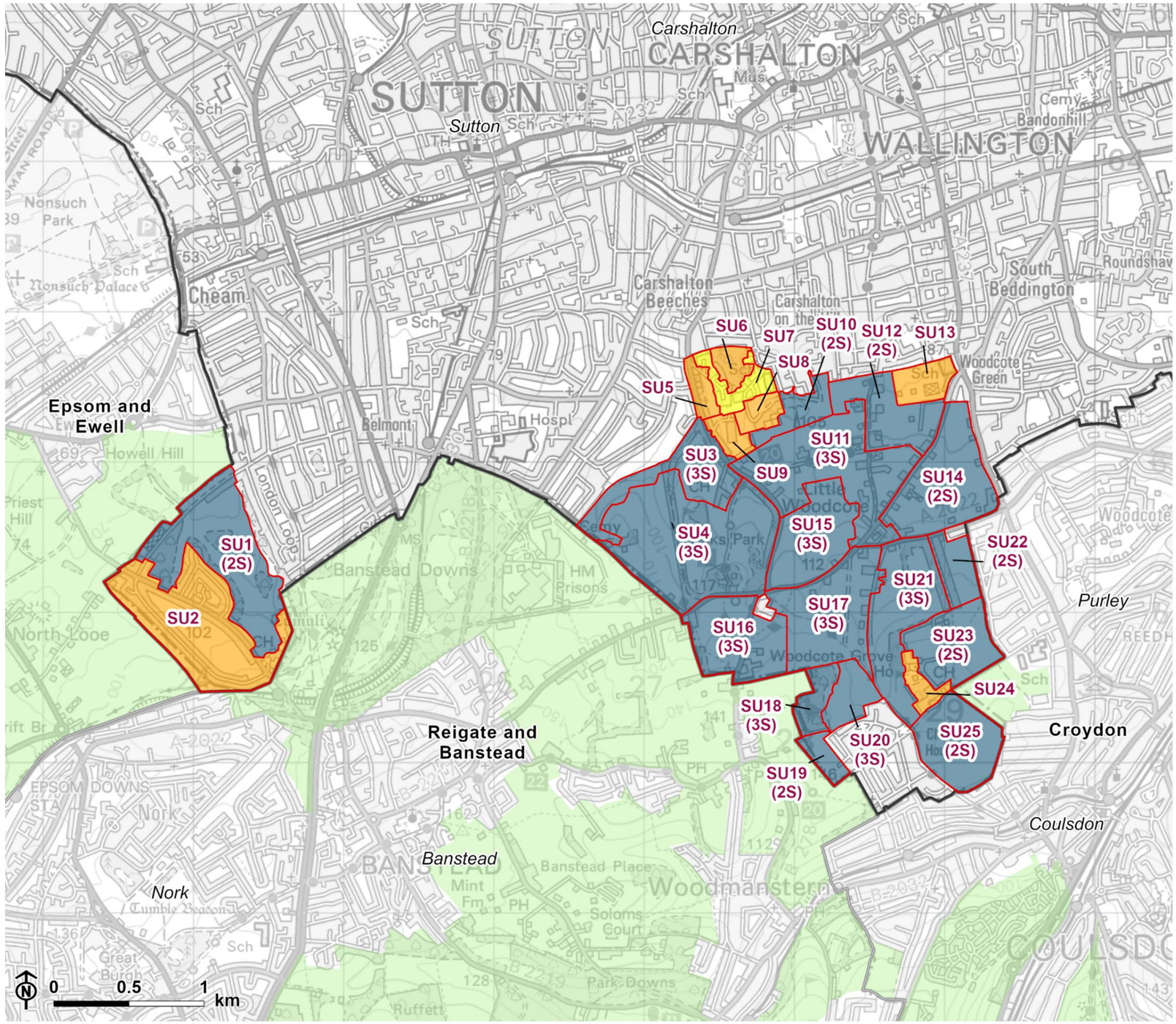
- Cuddington Golf Course (SU1) makes a strong contribution to purposes A and B.
- The open land immediately south of Carshalton Beeches in The Oaks Golf Course (SU3) makes a strong contribution to purposes A, B and C.
- The majority of Oaks Park Golf Course (SU4) makes a strong contribution to purposes A, B and C.
- Land south of Carshalton on the Hill (SU10) makes a strong contribution to purposes A and C.
- Land in between Little Woodcote and Woodcote Green (SU11) makes a strong contribution to purposes A, B and C.
- Land to the west of Oaks Park and Golf Course near Little Woodcote (SU15) makes a strong contribution to purposes A, B and C.
- Land south of Oaks Park and Golf Course (SU16) makes a strong contribution to purposes A, B and C.
- Land south of Woodcote Green and west and south west of Woodcote (parcels SU12, SU14, SU22, SU23 and SU25) make a strong contribution to purposes A and C.
- Land south of Little Woodcote (parcels SU17 and SU21) make a strong contribution to purposes A, B and C.
- Land at Big Wood (SU18) and to the immediate east of the wood (SU20) make a strong contribution to purposes A, B and C.
- Land south of Big Wood (SU19) makes a strong contribution to purposes A and B.

3.532 The area within Sutton that contributes the least to the Green Belt purposes is already largely developed, contained within the large built-up area (SU7) and so makes no more than a weak/no contribution to the Green Belt purposes.

3.533 Figure 3.120 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E.

Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.120: Highest contribution to NPPF Green Belt purposes



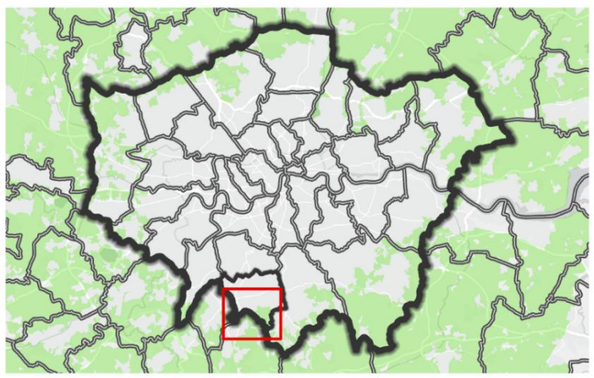
Legend

- Greater London boundary
- Sutton boundary
- Borough or district neighbouring Sutton boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.534 In light of the scale and contiguity of Green Belt land in Sutton and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development of land that would result in the physical or perceived merging of the large built-up area of Greater London with Banstead/Burgh Heath/Nork and the wider contiguous and sprawling urban areas beyond would have a fundamental impact on Purpose A
- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Carshalton/Sutton and Banstead/Burgh Heath/Nork.
  - Coulsdon and Banstead/Burgh Heath/Nork (via Woodmansterne and the ribbon development to the north and north west of it).
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.

Waltham Forest

Contribution to Green Belt Purpose A – to check the unrestricted sprawl of large built-up areas

3.535 Contribution to Purpose A is assessed by determining the role Green Belt land plays in preventing the sprawl of the large built-up areas of Greater London and surrounding large built-up areas (also defined as towns).

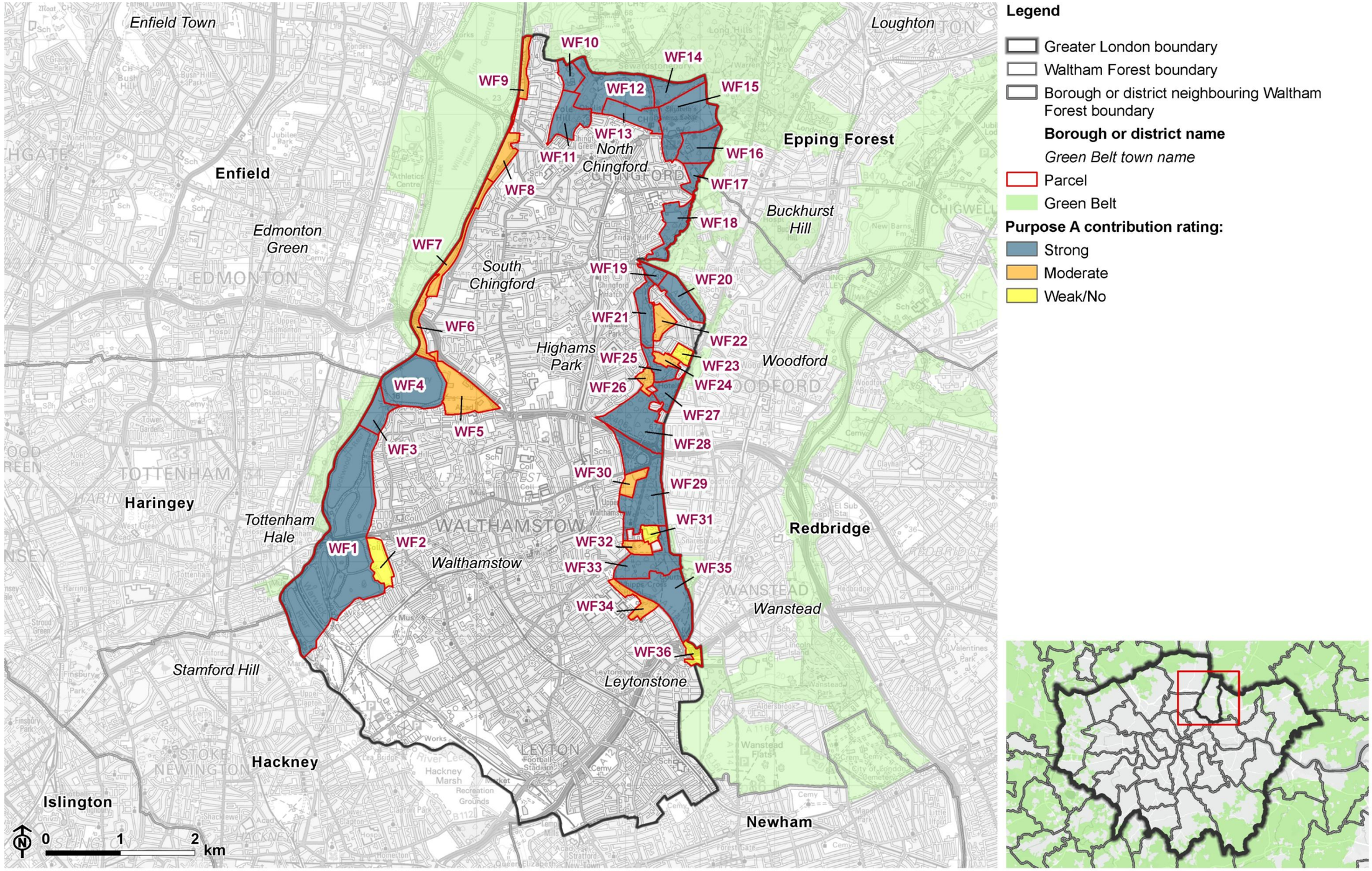
3.536 The areas of the borough that make a strong contribution to Purpose A are the least urbanised and open parcels, often containing large open bodies of water or mature woodlands that prevent localised sprawl into the open countryside in their immediate vicinity (parcels WF1, WF3, WF4, WF10-WF21, WF25, WF27 to WF29, WF33 and WF35). Release and development in these locations would represent notable incongruous sprawl of the large built-up area.

3.537 Green Belt land that is particularly developed (parcels WF23 and WF31) and/or contained and urbanised by the surrounding urban area (parcels WF2 and WF36) make a weak/no contribution to Purpose A.

3.538 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more urbanised by the large built-up area but still generally open and sufficiently distinct from the large built up area that development would have some sprawling influence or where the land is only partially open an urbanised.

3.539 Figure 3.121 illustrates the variations in contribution to Purpose A across Waltham Forest.

Figure 3.121: Contribution to Purpose A – Check the unrestricted sprawl of large built up areas



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Contribution to Green Belt Purpose B – to prevent neighbouring towns merging into one another

3.540 Contribution to Purpose B is assessed by determining the role Green Belt land plays in maintaining separation between distinct neighbouring towns.

3.541 The areas that make a strong contribution are the least urbanised and open parcels either contain large open bodies of water of mature woodland in the narrowest and therefore most fragile gaps between neighbouring towns. Parcels that make strong contributions to Purpose B include:

- Parcels WF1, WF3, WF4 and WF6 make a strong contribution maintaining separation between the neighbouring towns of Tottenham, Walthamstow, Edmonton Green and Chingford.
- Parcel WF16-WF18 make a strong contribution maintaining the majority of the fragile gap between Chingford and Buckhurst Hill.
- Parcels WF19-WF22, WF24, WF25, WF27 and WF28 make a strong contribution maintaining separation between the neighbouring towns of Highams Park and Woodford.
- Parcels WF29, WF30, WF32, WF33, WF35 and WF37 make a strong contribution maintaining separation between the neighbouring towns of Wanstead and Walthamstow/Leytonstone.

3.542 Parcels WF10-WF13 in the far north of the borough make a weak/no contribution to Purpose B, all of which lie in a wide robust gap between the neighbouring towns of Chingford and Loughton with Epping Forest representing a significant separating feature in the wider gap between the two.

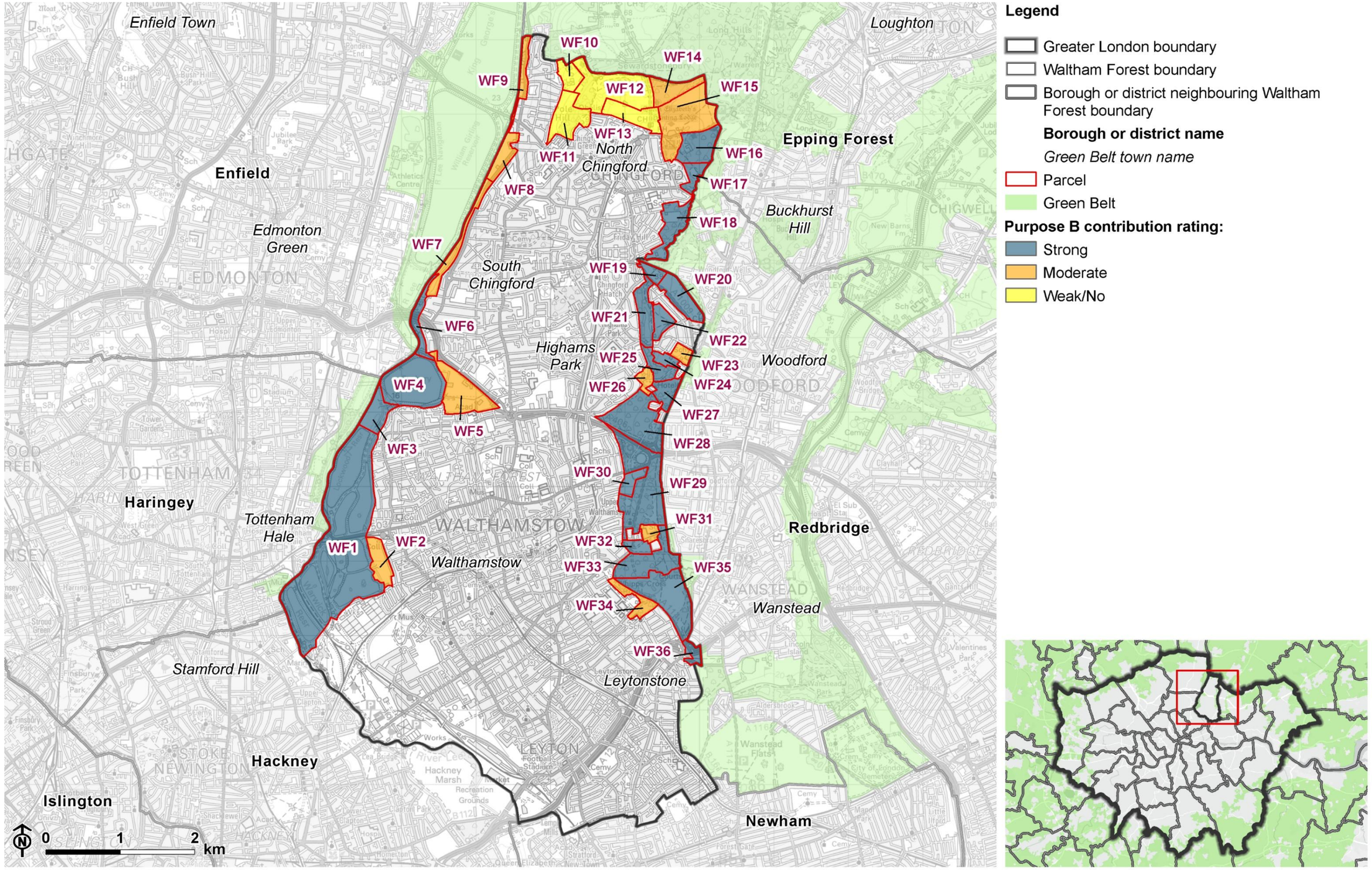
3.543 The remaining areas make a moderate contribution to this purpose for a range of reasons, including where:

- Land lies within fragile gaps between towns but is more contained by urban areas (parcels WF2, WF5 and WF34) or notably developed and urbanised (parcels WF23, WF26 and WF31).
- Land lies in fragile gaps but is retained by strong separating features such that they do not represent a substantial part of the gap but are still generally open and sufficiently distinct that they still play some separating role between closely neighbouring towns (parcels WF5, WF7, WF8 and WF9).

- Open land that is peripheral to fragile gaps between towns such that its development would have a notable but not significant containing influence on the fragile gap (parcels WF14 and WF15).

3.544 Figure 3.122 illustrates the variations in contribution to Purpose B across Waltham Forest.

Figure 3.122: Contribution to Purpose B – Prevent the merging of neighbouring towns



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Contribution to Green Belt Purpose C – to protect the countryside from encroachment

3.545 Contribution to Purpose C is assessed by determining whether land can be considered part of the countryside, the extent of urbanising influence affecting it and whether or not development in the parcel would increase urbanising influence on adjacent open land.

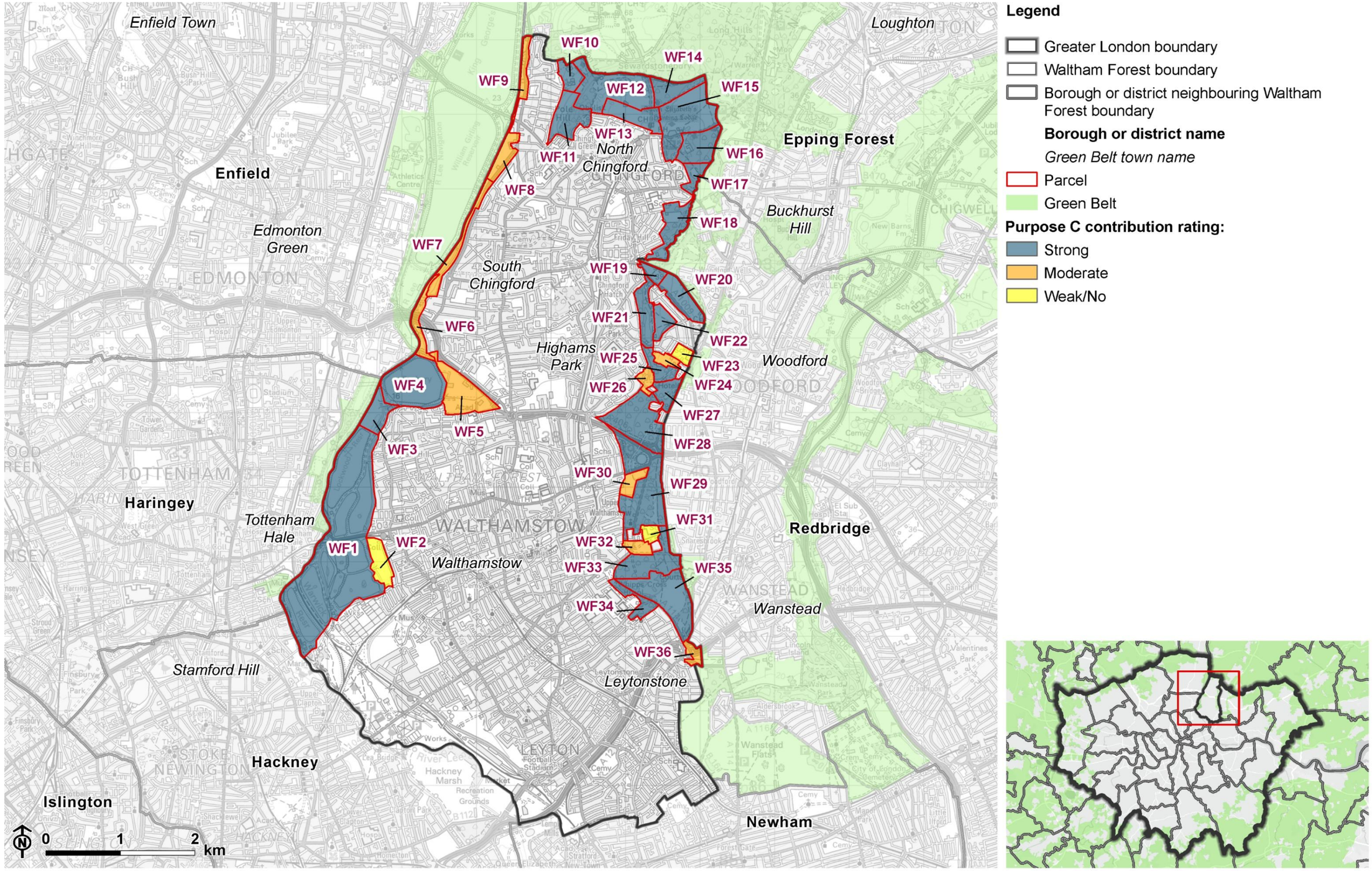
3.546 The vast majority of the area of the borough's Green Belt land is open countryside that has a strong sense of separation from urban areas and is not subject to any substantial urbanising influence. These areas make at least a strong contribution to this Green Belt purpose (parcels WF1, WF10, WF12, WF13, WF15 to WF17, WF20, WF22, WF34 and WF35). Such locations are more vulnerable to encroaching impacts on the wider countryside. These wider impacts are particularly acute where release and development within parcels risks severing areas of open countryside, isolating them within the urban area. This risk is greatest in the narrowest portions of the green wedges in the east and west of the borough (parcels WF3 and WF4 to the west and parcels WF18, WF19, WF21, WF25, WF27 to WF29 and WF33), with the exception of the southern-most sections which mark the end of green wedges. These parcels make a strong contribution to Purpose C. Parcels WF11 and WF14 also makes a strong contribution to Purpose C, with their wooded slopes having notable separation from the urban areas in the borough, generally screened by thick woodland or facing out to the wider open countryside.

3.547 Green Belt land that is particularly developed (parcels WF23 and WF31) and/or contained and urbanised by the surrounding urban area (WF2) make a weak/no contribution to Purpose C.

3.548 The remaining areas make a moderate contribution to this purpose for a range of reasons, such as where the land is more strongly retained by the high reservoir embankments and/or contained by urban areas but is still generally open and sufficiently distinct that development would represent encroachment into the countryside. Other areas may be open but have land uses associated with the urban area rather than the open countryside, such as sports playing fields, cemeteries and allotments and have limited relationship with the wider countryside such that development would not have a wider encroaching influence.

3.549 Figure 3.123 illustrates the variations in contribution to Purpose C across Waltham Forest.

Figure 3.123: Contribution to Purpose C – Assist in safeguarding the countryside from encroachment



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Contribution to Green Belt Purpose D – to preserve the setting and special character of historic towns

3.550 A review of relevant designations within and adjacent to the Borough has been undertaken. Drawing on the definition of Green Belt towns explored in the section relating to Green Belt Purpose B above, the Borough contains and lies in reasonable proximity to 13 settlements large enough to be considered towns in Green Belt terms: Edmonton Green, Enfield Town, Highams Park, Leytonstone, Loughton/Buckhurst Hill, North Chingford, South Chingford, Stamford Hill, Tottenham Hale (Tottenham), Waltham Abbey, Walthamstow, Wanstead and Woodford.

3.551 Within some of these urban areas there are a number of conservation areas, the majority of which are located deep within the large built-up urban area and consequently have no notable physical or visual relationship with the open countryside designated as Green Belt. These areas tend to be focused on historic buildings and spaces, with views being internal (e.g. along roads, across open spaces and towards landmarks/focal points). This includes Edmonton Green, Tottenham Hale, Walthamstow and Wanstead. Other towns, including Enfield, Loughton/Buckhurst Hill and Waltham Abbey, are located in neighbouring boroughs and at such a distance that Green Belt land within Waltham Forest makes little to no contribution to their setting and special character. Stamford Hill is not considered to be a historic town as it lacks a 'historic urban core' (intermediate type within the 'urban settlement' broad type) identified within the Greater London Historic Landscape Characterisation (GLHLC) (2021) and does not contain any conservation area designations.

3.552 However, the following towns have conservations areas which are located in close proximity to Green Belt land:

- Highams Park is primarily a residential area, with mainly Victorian and 1930s terraced houses. An area of housing developed in 1946 - the Ropers Field Estate - is covered by **Ropers Field Conservation Area**. The Ropers Field Conservation Area Appraisal (n.d.) notes that the special interest of the area lies in the architectural and historic qualities of the buildings, with a spacious layout of low-density semi-detached houses and maisonettes having *'echoes of the Garden City and Garden Suburb movement of Ebeneezer Howard, Parker & Unwin, and other founding fathers of Town Planning from the turn of the century'*. In regard to the setting, the conservation area appraisal notes that surrounding areas of surviving green space enhance the suburban quality of the estate, although this relates to green spaces within the surrounding suburban areas (such as Larkswood, the Rolls Sports Ground and Anslie Wood). The surrounding later suburban development largely restricts the physical and visual

connection with wider surrounding Green Belt land within Waltham Forest. To the east of the Ropers Field Estate within the Green Belt there is an area designated as the **Higham's Estate, Woodford Green Area of Special Character**. The estate was largely developed as a whole by the Warner family in the 1930s, and has a low-density suburban quality, with a recognisable and largely uniform architectural style and layout. The designation relates specifically to the qualities of the suburban development rather than the historic town of Highams Park.

- The GLHLC (2021) identifies an area of 'historic urban core' (intermediate type within the 'urban settlement' broad type) within **Chingford**, in an area also covered by **Chingford Green Conservation Area**. This historic core of the town is centred on the Green, a triangle of former forest land on which stands the 19th century parish church and churchyard of St Peter & St Paul. The conservation area has special interest as a locality that demonstrates clear evolution and development over time, from a rural forested settlement, through to Victorian and Edwardian suburbanisation and expansion, as well as some limited later post war development. It retains a strong village feel, with a collection of religious, communal and civic buildings set around the historic Green. Whilst the conservation area is located on higher ground to the east of the Lee Valley and west of the River Ching valley, owing to the presence of surrounding later development there are no identified visual connections with Green Belt land in Waltham Forest. However, to the immediate north and north-east the Chingford Green Conservation Area lies the **Chingford Station Road Conservation Area**. In regard to the areas special interest the conservation area appraisal notes *'the historic settlement was characterised by its historic landscape setting to the north and'* and that *'this setting remains undeveloped today and forms a fundamental element to the character and unique quality of the place'*. The appraisal also notes a strong visual and physical relationship with this former forested land now comprising Chingford Golf Course, *'best experienced along Forest View and in north easterly views along Eglington Road, The Drive and Farnley Road where the forest trees terminate framed views'.* This area to the immediate north and east of Chingford - **Fairmead Park** - is designated as a Park and Garden of Local Historic Interest.
- Settlement in the Leyton area probably started in the Saxon period and remained largely rural until the construction of the Eastern Counties Railway in 1856, following which the area saw a rapid residential development. The historical part of the town centered on the 19th century parish church of St Andrew's is protected by **Leytonstone Conservation Area**. This area is located on the high ground at the eastern edge of the Lea Valley and immediately adjoins substantial surviving remnants of the great forest of

Waltham, now Epping Forest. The Leytonstone Conservation Area Appraisal (2011) describes this forest-side position as *'an enduring characteristic of the area'*. It also notes that *'extensive long views of all the Whipps Cross buildings are available from the sparsely tree'd forest land to the north east'* but that *'the tree cover on the forest land to the north between Forest Glade and James Lane is … extensive right up to Forest Glade itself, and views are as a result very limited both into and out of the area'*.

- Historically, Woodford was made up of three small and separate hamlets set within the vast expanse of the Epping Forest: Woodford Bridge, Woodford Green and Woodford Wells. Woodford Green and Woodford Wells lie within the west of the neighbouring London Borough of Redbridge and so have some physical and visual relationship with Green Belt within Waltham Forest. Woodford Green and Woodford Wells developed along a forest track (now the A104) following a low ridge of land that slopes gently down towards the River Ching in the west. Surviving historic parts of the town are today protected by **Woodford Green Conservation Area**, **Woodford Wells Conservation Area** and **South Woodford Conservation Area**. The Woodford Green and Woodford Wells Conservation Area Appraisal (2007) states that the special interest of the area relates to several factors, including *'the long, semi-natural open spaces which form the heart of the area'* and *'a village feel to the centre of the Conservation Areas and a semi-rural feel outside it'*.

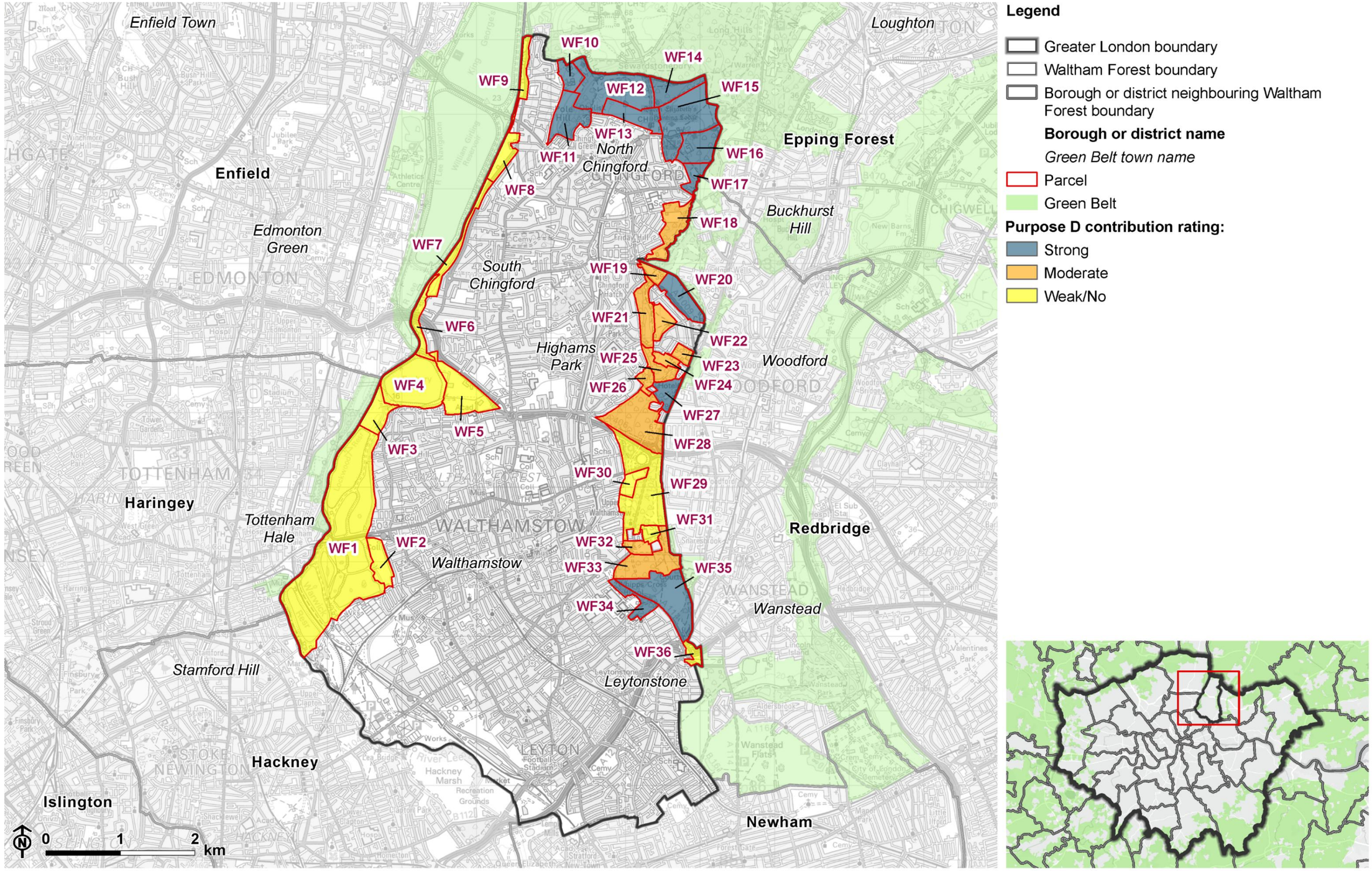
3.553 Based on the above, the following areas of the Green Belt land within Waltham Forest are considered to make a contribution to Green Belt Purpose D:

- Remnant parts of the great forest of Waltham (Epping Forest) within the south-east of the borough form part of the setting to the town of Leytonstone. Areas in proximity have a strong visual connection with historic parts of the town and make a strong contribution to its setting and special character (parcels WF34 and WF35), whilst more distant areas form part of the wider setting and make a moderate contribution (parcels WF32 and WF33).
- Open Green Belt land in the east of the borough form part of the setting to the town of Woodford. Land in proximity forms part of the open setting at the heart of Woodford, making a strong contribution to its setting and special character (parcels WF20 and WF27), with areas more distant forming a wider open setting to the town and making a moderate contribution (parcels WF18, WF19, WF21, WF22, WF23, WF24, WF25, WF26 and WF28).
- Open undeveloped remnant forest landscape to the north and east of Chingford that makes a strong contribution to its setting and special character (parcels WF10, WF11, WF12, WF13, WF14, WF15, WF16 and WF17).

3.554 The borough's historic environment record is subject to change. New evidence may be published at a later date that justifies local changes to the setting and special character of historic aspects of historic towns.

3.555 Figure 3.124 illustrates the variations in contribution to Purpose D across Waltham Forest.

Figure 3.124: Contribution to Purpose D – Preserve the setting and special character of historic towns



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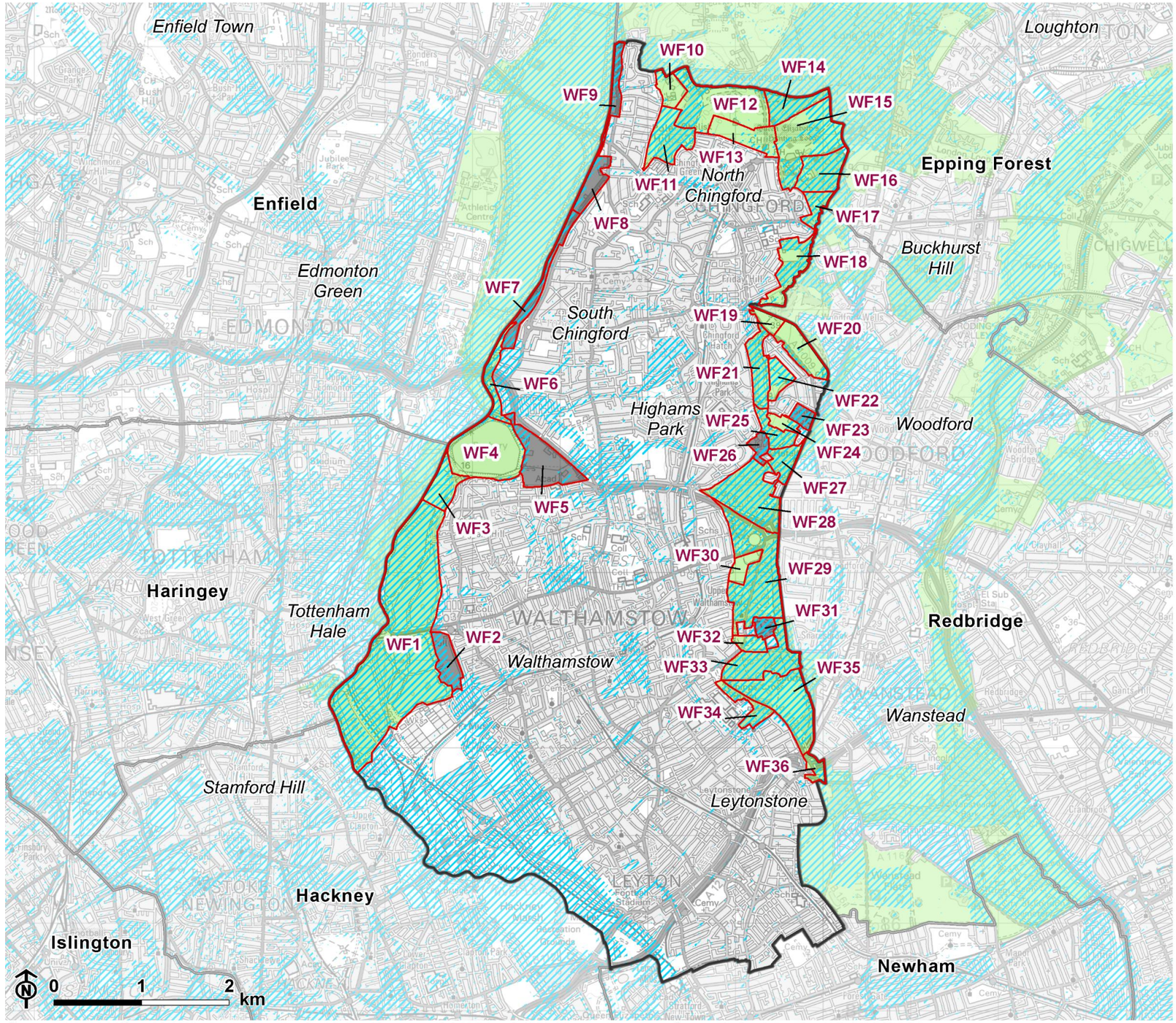
Potential grey belt in the London Borough of Waltham Forest

3.556 Having regard to the definition set out in the NPPF, the following areas of Waltham Forest are defined as having potential for definition as grey belt land subject to further work by the borough:

- Douglas Eyre Playing Fields and sports centre (WF2).
- Urbanised playing fields, scrubland and development east of Banbury Reservoir (WF5).
- Scrubland and playing fields east of the River Lea (parcels WF9 to WF19).
- Woodford High School and associated playing fields (WF23).
- Tower blocks along St Patricks Court, The Bridle Path, the Oaks and Matson Court and their immediate surroundings, including the land immediately south of Oak Hill contained by the Epping Forest Hotel (WF26).
- Forest School and associated buildings and playing fields (WF31).

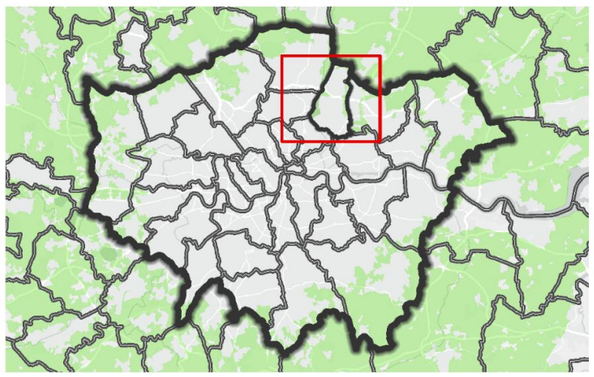
3.557 Figure 3.125 illustrates the area potentially suitable for definition as grey belt land within Waltham Forest.

Figure 3.125: Green Belt land potentially suitable for definition as grey belt land



Legend

- Greater London boundary
- Waltham Forest boundary
- Borough or district neighbouring Waltham Forest boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt
- Potentially suitable for definition as grey belt land in the borough
- NPPF Footnote 7 areas and assets



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Highest and lowest contributing Green Belt land

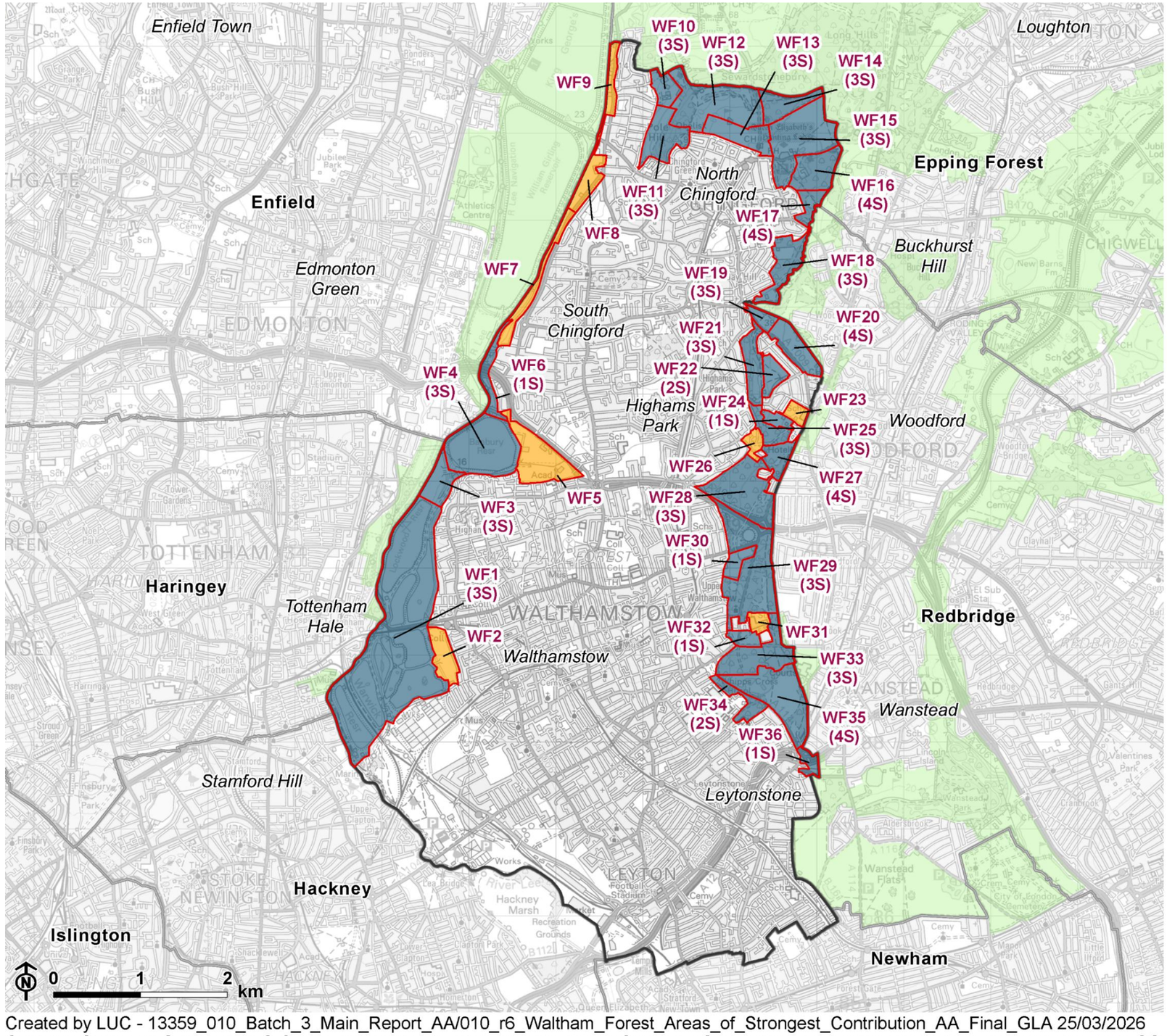
3.558 The majority of the Green Belt in Waltham Forest makes a strong contribution to at least one of the Green Belt purposes. Notable areas of the Green Belt that make the greatest contribution to the greatest number of Green Belt purposes include:

- The core components of the open wedge of Green Belt land in the east of the borough, comprised of the large reservoirs (parcels WF1 and WF4) and the intervening Tottenham Marshes (WF2). These parcels make a strong contribution to purposes A, B and C. Other narrow open parts of the important gap also make a strong contribution to Purpose B (WF6).
- The open wooded slopes in the north of the borough all of which make a strong contribution to purposes A and C (parcels WF10-WF15). In addition, parcels WF10 to WF17 make a strong contribution to Purpose D.
- The core components of the open wedge of Green Belt land in the west of the borough, comprised of the remnants of Waltham Forest, which is part of Epping Forest (parcels WF16 to WF22, WF24 and WF25, WF27 to WF29 and WF32 to WF36). Several of these parcels make a strong contribution to purposes A, B and C (parcels WF16-WF19, WF22, WF25, WF27, WF28, WF29, WF33 and WF34). Wider open parts of the important eastern gap make a strong contribution to purposes B and C (WF22), Purpose B (parcels WF24, WF32 and WF36) or Purpose C (WF34). In addition, four parcels in this green wedge make a strong contribution to Purpose D (parcels WF20, WF27, WF34 and WF35).

3.559 The areas within Waltham Forest that contribute the least to the Green Belt purposes are already significantly developed (parcels WF23, WF26 and WF31) or significantly retained by the high embankments of the reservoirs to the west, with the neighbouring urban area dominating (parcels WF2, WF5, WF7, WF8 and WF9). All these parcels make no more than a moderate contribution to the Green Belt purposes. No parcels in the borough make a weak/no contribution to all Green Belts purposes A, B, C and D.

3.560 Figure 3.126 illustrates the strongest level of contribution each area of the borough's Green Belt land makes to Green Belt purposes A, B, C and D, noting all Green Belt land in London is judged to make a moderate contribution to Purpose E. Where parcels make a strong contribution to more than one Green Belt purpose, the number of these ratings is referenced. The following sections describe the broad patterns of contribution to each Green Belt purpose.

Figure 3.126: Highest contribution to NPPF Green Belt purposes



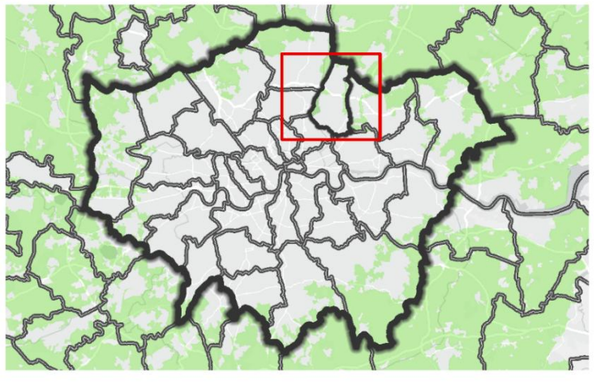
Legend

- Greater London boundary
- Waltham Forest boundary
- Borough or district neighbouring Waltham Forest boundary
- **Borough or district name**
- *Green Belt town name*
- Parcel
- Green Belt

Highest contribution rating:

- Strong
- Moderate
- Weak/No

Note:
The number of 'Strong' contribution ratings in a parcel are included in brackets '()' below each relevant parcel reference to illustrate where parcels perform strongly to multiple purposes.



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Possible fundamental impacts to remaining Green Belt land

3.561 In light of the scale and contiguity of Green Belt land in Waltham Forest and contributions the borough's Green Belt land makes to the Green Belt purposes, release or development that would do the following would likely fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole:

- Release or development that would result in the physical or perceived merging of the majority of the towns within and adjacent to the borough would have a fundamental impact on Purpose B, notably:
  - Stamford Hill/Tottenham Hale and Walthamstow.
  - Edmonton Green/Enfield Town and Chingford.
  - Chingford and Buckhurst Hill/Loughton.
  - Chingford/Highams Park and Woodford.
  - Walthamstow and Woodford.
  - Wanstead and Walthamstow.
  - Leytonstone and Wanstead.
- Release or development of the vast majority of the open Green Belt land within the borough would likely have a fundamental impact on Purpose C.
- Release or development of the open remnant forest landscape to the north and east of Chingford that are important to Chingford's setting and special character (parcels WF10, WF11, WF12, WF13, WF14, WF15, WF16 and WF17) would have a fundamental impact on Purpose D.
- Release or development of the remnant parts of the great forest of Waltham (Epping Forest) that are important to the setting of Leytonstone (parcels WF34 and WF35) would have a fundamental impact on Purpose D.
- Release or development of the open Green Belt land that is important to the open setting at the heart of Woodford (parcels WF20 and WF27) would have a fundamental impact on Purpose D.

Making Green Belt planning decisions

3.562 LUC has assessed the contribution of Green Belt land and has identified where there is currently potential to define grey belt land in each London borough, in line with relevant planning policy and guidance.

3.563 Further detailed work undertaken by the London boroughs may identify additional smaller areas of Green Belt land as having potential for definition as grey belt land. Conversely, further detailed work undertaken by the London boroughs may justify why areas identified in this study as having potential for definition as grey belt land do not meet the definition, for example due to effects on NPPF footnote 7 areas and assets.

3.564 The potential grey belt land identified in this study, or grey belt defined through further detailed work undertaken by the boroughs, may not be suitable for development and/or release from the Green Belt designation. London boroughs, as the local planning authorities, must:

- set out the necessary exceptional circumstances for releasing land from the Green Belt;
- determine development's appropriateness in the Green Belt; or,
- determine the necessary very special circumstances for inappropriately developing Green Belt land have been met.

3.565 Each is a matter of planning judgement requiring consideration of a much wider range of planning issues and evidence than the judgements of Green Belt contribution covered in this study. This study should not be used in isolation to inform these decisions.

3.566 Full consideration should be given to wider national planning policy and practice guidance, including but not limited to plan and site sustainability, deliverability and viability:

- Paragraph 148 of the NPPF which highlights that 'sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115' in plan-making.
- Paragraph 153 of the NPPF which states that 'very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.'
- Paragraph 157 of the NPPF which states 'The use of site-specific viability assessment for land within or released from the Green Belt should be subject to the approach set out in national planning practice guidance on viability.'

Chapter 4
Overall Potential Distribution of Grey Belt Across London

4.1 Table 4.1 includes a few statistics to help put the Green Belt study findings into a wider city context. **Figure 4.1** illustrates the distribution of potential grey belt land across the city.

4.2 This strategic assessment of Greater London's Green Belt land has identified roughly 20% of its total area as having potential to be defined as grey belt land, subject to further work at the borough level. This further detailed work might where justified:

- identify additional areas of grey belt land at a more granular scale (below 5ha);
- judge the potential areas of grey belt identified in this study as not suitable for definition as grey belt;
- identify a need to refine the areas of potential grey belt land to focus in more closely on the particularly urbanised and/or contained/retained areas within them; and/or
- exclude areas of potential grey belt land where the application of the policies relating to the areas or assets in NPPF footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.

4.3 In reviewing these findings, it is important to note that the extent of Green Belt land across the city varies significantly from borough to borough, with five of the city's 18 Green Belt boroughs containing nearly 70% of the total area of Green Belt land. Consequently, the area of search for grey belt land within some boroughs is significantly larger than others, with the largest areas of potential grey belt land generally being found in the boroughs with the largest areas of Green Belt.

4.4 The London boroughs with the largest areas of potential grey belt land are:

- Hillingdon with the 3rd largest area of Green Belt land has roughly 1,645ha of potential grey belt land. This represents roughly 34% of its total area of Green Belt land and roughly 24% of the total area of potential grey belt land identified across the city. It is important to note, however, that 26% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.

- Bromley with the largest area of Green Belt land has roughly 850ha of potential grey belt land. This represents roughly 11% of its total area of Green Belt land and roughly 12% of the total area of potential grey belt land identified across the city. It is important to note, however, that 23% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Havering with the 2nd largest area of Green Belt land has roughly 770ha, which represents roughly 13% of its total area of Green Belt land and roughly 11% of the total area of potential grey belt land identified across the city. It is important to note, however, that 21% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Croydon with the 6th largest area of Green Belt land has roughly 575ha, which represents roughly 26% of its total area of Green Belt land and roughly 8% of the total area of potential grey belt land identified across the city. It is important to note, however, that 16% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Hounslow with the 8th largest area of Green Belt land has roughly 515ha, which represents roughly 42% of its total area of Green Belt land and roughly 7% of the total area of potential grey belt land identified across the city. It is important to note, however, that 6% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Enfield with the 4th largest area of Green Belt land has roughly 500ha, which represents roughly 16% of its total area of Green Belt land and roughly 7% of the total area of potential grey belt land identified across the city. It is important to note, however, that 43% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.

4.5 The London boroughs with the smallest areas of potential grey belt land are:

- Newham with the 2nd smallest area of Green Belt land has roughly 5ha, which represents roughly 6% of its total area of Green Belt land and roughly 0.1% of the total area of potential grey belt land identified across the city. None of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, but it does lie within their immediate vicinity.
- Harringay with the smallest area of Green Belt land has roughly 20ha, which represents roughly 33% of its total area of Green Belt land and roughly 0.3% of

the total area of potential grey belt land identified across the city. It is important to note, however, that 96% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with the remaining area falling within their immediate vicinity.

- Richmond-upon-Thames with the 3rd smallest area of Green Belt land has roughly 30ha, which represents roughly 23% of its total area of Green Belt land and roughly 0.4% of the total area of potential grey belt land identified across the city. It is important to note, however, that 12% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Waltham Forest with the 11th largest area of Green Belt land has roughly 95ha, which represents roughly 11% of its total area of Green Belt land and roughly 1% of the total area of potential grey belt land identified across the city. It is important to note, however, that 56% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Sutton with the 6th smallest area of Green Belt land has roughly 100ha, which represents roughly 17% of its total area of Green Belt land and roughly 2% of the total area of potential grey belt land identified across the city. It is important to note, however, that 1% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Barking and Dagenham with the 5th smallest area of Green Belt land has roughly 145ha, which represents roughly 28% of its total area of Green Belt land and roughly 2% of the total area of potential grey belt land identified across the city. It is important to note, however, that 14% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.

4.6 With the remaining London boroughs falling in the middle:

- Barnet with the 5th largest area of Green Belt land has roughly 420ha, which represents roughly 18% of its total area of Green Belt land and roughly 6% of the total area of potential grey belt land identified across the city. It is important to note, however, that 30% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Harrow with the 10th largest area of Green Belt land has roughly 335ha, which represents roughly 31% of its total area of Green Belt land and roughly 5% of the total area of potential grey belt land identified across the city. It is important

to note, however, that 29% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.

- Redbridge with the 7th largest area of Green Belt land has roughly 310ha, which represents roughly 16% of its total area of Green Belt land and roughly 4% of the total area of potential grey belt land identified across the city. It is important to note, however, that 31% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Bexley with the 9th largest area of Green Belt land has roughly 245ha, which represents roughly 22% of its total area of Green Belt land and roughly 4% of the total area of potential grey belt land identified across the city. It is important to note, however, that 34% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Ealing with the 4th smallest area of Green Belt land has roughly 245ha, which represents roughly 79% of its total area of Green Belt land and roughly 4% of the total area of potential grey belt land identified across the city. It is important to note, however, that 10% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.
- Kingston-upon-Thames with the 12th largest area of Green Belt land has roughly 150ha, which represents roughly 24% of its total area of Green Belt land and roughly 2% of the total area of potential grey belt land identified across the city. It is important to note, however, that 18% of the area of potential grey belt land identified in this borough overlaps with NPPF footnote 7 areas and assets, with a larger area falling within their immediate vicinity.

4.7 Figure 4.1 illustrates some clear patterns in the general distribution of potential grey belt land across Greater London. These patterns are a product of the application of national planning practice guidance, specifically the guidance on how to assess the contribution of Green Belt land to Green Belt purposes A, B and D (the purposes relevant to the definition of grey belt land) in the context of Greater London and its relationship with neighbouring boroughs' and districts' settlements and countryside.

4.8 London boroughs have a higher proportion of potential grey belt land where a greater proportion of their Green Belt land is:

- already inappropriately developed;

- more contained and urbanised by urban areas, including Green Belt land that has become truncated by and/or isolated within large built-up areas away from the wider countryside designated as Green Belt;
- retained by physical features in reasonable proximity to large built-up areas;
- not within or on the periphery of fragile gaps between neighbouring towns, either as a result of an absence of neighbouring towns, wider significant separating features maintaining physical and visual separation between neighbouring towns and/or neighbouring towns having already merged to a significant degree;
- not part of the setting and does not make a considerable contribution to the special character of a historic town.

4.9 London boroughs have a lower proportion of potential grey belt land where a greater proportion of their Green Belt land is:

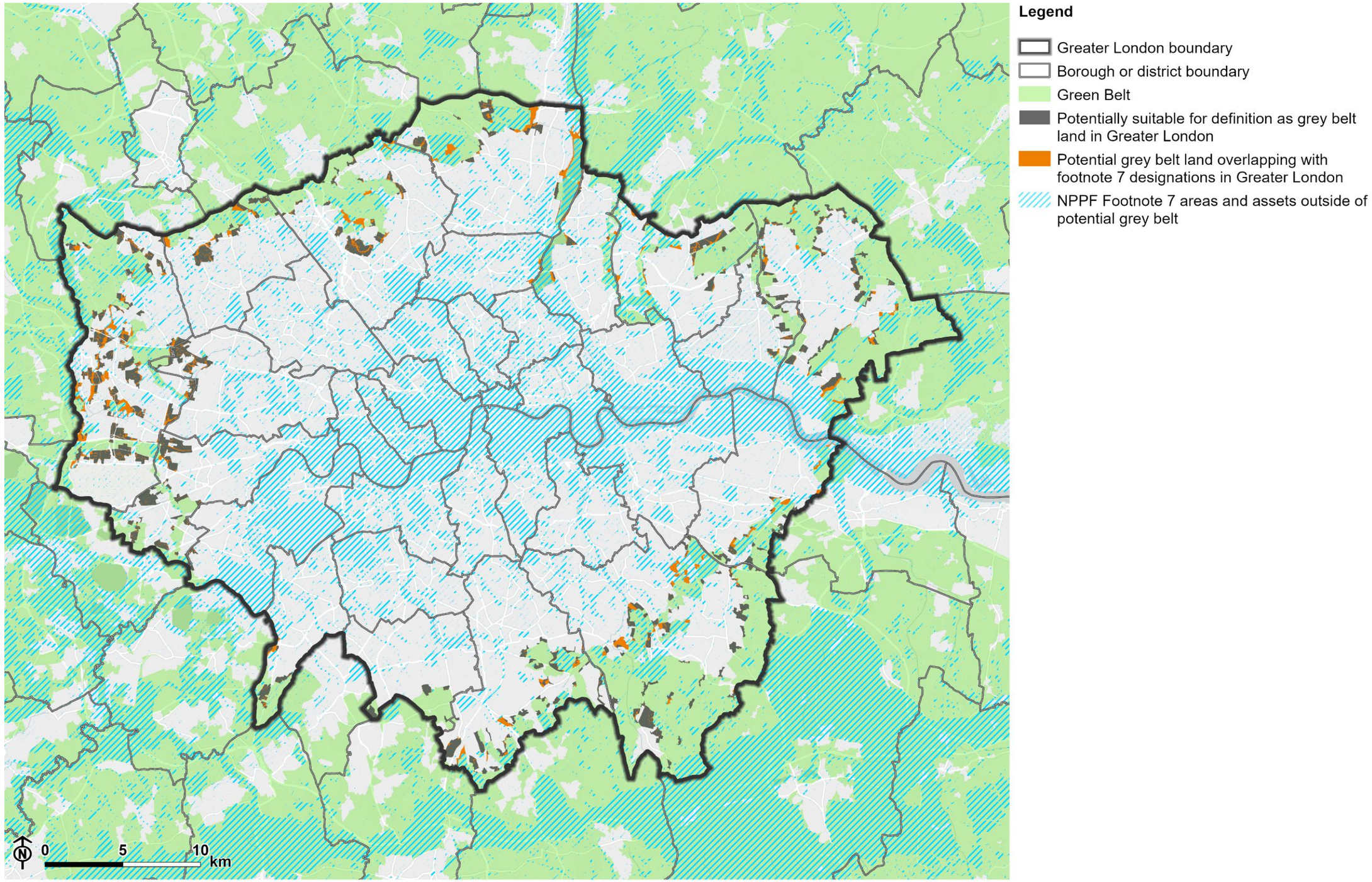
- open and free from urbanising influences;
- not contained and urbanised by urban areas, or retained by physical features in reasonable proximity to large built-up areas;
- within or on the periphery of fragile gaps between neighbouring towns;
- part of the setting or makes a considerable contribution to the special character of a historic town.

Table 4.1: Greater London Green Belt Study Statistics

Borough	Green Belt (ha)	Potential Grey Belt (ha)	Footnote 7 Designations on Potential Grey Belt Land (ha)	Percentage of Green Belt that is Potential Grey Belt	Percentage of Potential Grey Belt Covered by Footnote 7 Designations	Borough's Green Belt as a Percentage of Greater London's Total Green Belt	Borough's Potential Grey Belt as a Percentage of Greater London's Total Potential Grey Belt
Barking and Dagenham	528	146	20	27.6%	14%	1.5%	2.1%
Barnet	2,390	421	121	17.6%	29%	6.9%	6.0%
Bexley	1,121	247	84	22.0%	34%	3.2%	3.5%
Bromley	7,660	851	195	11.1%	23%	22.0%	12.2%
Croydon	2,189	574	94	26.2%	16%	6.3%	8.2%
Ealing	308	243	24	79.1%	10%	0.9%	3.5%
Enfield	3,068	503	216	16.4%	43%	8.8%	7.2%
Haringey	60	20	19	33.1%	96%	0.2%	0.3%
Harrow	1,089	335	93	30.8%	28%	3.1%	4.8%
Havering	6,067	769	161	12.7%	21%	17.4%	11.0%
Hillingdon	4,870	1,644	436	33.8%	26%	14.0%	23.6%
Hounslow	1,225	513	31	41.9%	6%	3.5%	7.4%
Kingston upon Thames	639	150	27	23.5%	18%	1.8%	2.2%
Newham	79	5	0	6.4%	0%	0.2%	0.1%
Redbridge	1,923	309	96	16.1%	31%	5.5%	4.4%
Richmond upon Thames	134	31	4	23.2%	12%	0.4%	0.4%
Sutton	605	103	1	17.1%	1%	1.7%	1.5%
Waltham Forest	845	96	53	11.4%	56%	2.4%	1.4%

Borough	Green Belt (ha)	Potential Grey Belt (ha)	Footnote 7 Designations on Potential Grey Belt Land (ha)	Percentage of Green Belt that is Potential Grey Belt	Percentage of Potential Grey Belt Covered by Footnote 7 Designations	Borough's Green Belt as a Percentage of Greater London's Total Green Belt	Borough's Potential Grey Belt as a Percentage of Greater London's Total Potential Grey Belt
Totals	**34,802**	**6,960**	**1,675**	**20%**	**24%**	**100%**	**100%**

Figure 4.1: Distribution of potential grey belt land across the city and NPPF footnote 7 areas and assets



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Appendix A
Green Belt Towns

A.1 Appendix A identifies the towns relevant to the assessment of contribution to Purpose B (to prevent neighbouring towns merging into one another) within and around each of the 18 London boroughs with Green Belt land.

Barking and Dagenham

A.2 Annex 1 of the London Plan names Barking, Barking Riverside, Chadwell Heath, Dagenham Heathway, Green Lane and Merrielands Crescent as towns in the London Borough of Barking and Dagenham. Only Chadwell Heath/Marks Gate and Dagenham border the metropolitan Green Belt. No open Green Belt land lies directly between towns in the borough; however, the metropolitan Green Belt separates these towns from the neighbouring Annex 1 towns of Collier Row, Elm Park, Hornchurch and Romford (including Becontree Heath and Rush Green in the London Borough of Barking and Dagenham) in the London Borough of Havering to the east.

A.3 To the north, Hainault in the neighbouring London Borough of Redbridge is not defined in Annex 1 of the London Plan as a town; however, Policy LP34 of the London Borough of Redbridge's adopted Local Plan (2018) refers to the Green Belt as playing an important role in preventing the merging of 'Barkingside with Hainault'. Furthermore, the population of Hainault in the 2021 Census was considerably larger than 7,500.

A.4 These relevant towns are consistent with the towns named in the named London boroughs' adopted Local Plans.

A.5 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Barking and Dagenham are:

- Chadwell Heath;
- Collier Row;
- Dagenham;
- Elm Park;
- Hainault;
- Hornchurch; and
- Romford.

Barnet

A.6 Annex 1 of the London Plan names Burnt Oak, Brent Cross, Brent Street, Chipping Barnet, Church End, Colindale/The Hyde, Cricklewood, East Finchley, Edgware, Golders Green, Hendon Central, Mill Hill, New Barnet, North Finchley, Temple Fortune and Whetstone as towns in the London Borough of Barnet. Only Chipping Barnet, Church End (via West Finchley), Edgware, Hendon, Mill Hill, New Barnet, North Finchley (via West Finchley and Woodside Park) and Whetstone (via Totteridge) lie adjacent to the metropolitan Green Belt. Some open Green Belt land lies directly between Hendon and Mill Hill, Church End (via West Finchley) and Mill Hill, Mill Hill and Whetstone (via Totteridge), Chipping Barnet and New Barnet and Whetstone (via Totteridge), Chipping Barnet (via Arkley and Barnet Gate) and Edgware in the borough.

A.7 To the north lies Hertsmere Borough. Hertsmere Borough Council's adopted Core Strategy (2013) names Borehamwood, Bushey, Potters Bar and Radlett as towns. Borehamwood is the closest to the urban area of Barnet, with Bushey and Potters Bar further to the west and north, respectively.

A.8 To the east, Hadley Wood in the neighbouring London Borough of Enfield sits in between the towns of Barnet and Potters Bar. Hadley Wood has a narrow physical connection to the main metropolitan area along Cockfosters Road, but is generally separated by open Green Belt land comprised of Monken Hadley Common and Hadley Wood Golf Course. The population of the urban area of Hadley Wood north of these open spaces is less than 7,500 in the 2021 Census, so this urban area is not defined as a town in its own right.

A.9 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Barnet are:

- Borehamwood;
- Bushey;
- Chipping Barnet;
- Church End (via West Finchley);
- Edgware;
- Hendon;
- Mill Hill;
- New Barnet;
- Potters Bar; and

- Whetstone (via Totteridge).

Bexley

A.10 Annex 1 of the London Plan names Belvedere, Bexleyheath, Crayford, Erith, Sidcup and Welling as towns in the London Borough of Bexley. Only Bexleyheath (via Bexley) and Crayford are partially separated by open Green Belt land north and south of Bourne Road (A223) and the River Cray.

A.11 To the north east, open Green Belt land and the River Thames separate the Bexley urban area from the urban areas of Grays, Purfleet and West Thurrock on the northern bank of the River Thames lies in neighbouring Thurrock. Thurrock's adopted Local Plan (2015) identifies Grays as the only town within the borough, but acknowledges it forms part of a wider conurbation of centres including Purfleet and West Thurrock.

A.12 To the east, Dartford in neighbouring Dartford Borough is largely merged with Crayford in the London Borough of Bexley; however, some open Green Belt land, covered by the Crayford and Dartford Marshes, lies between Crayford/Erith and Dartford to the north. Dartford is defined as a town in the adopted Dartford Borough Local Plan (2024).

A.13 To the south east, Sevenoaks District's Settlement Hierarchy, published as a standalone evidence based document in 2022, defines Edenbridge, Sevenoaks, Swanley and Westerham as towns, but only Swanley is sufficiently close to the London Borough of Bexley to be of relevance to the assessment of Purpose B.

A.14 To the south, the metropolitan Green Belt separates Sidcup from the neighbouring Annex 1 towns of Bromley (via Chislehurst) and Orpington/Petts Wood (via St Mary Cray and St Paul's Cray) in the London Borough of Bromley.

A.15 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Bexley are:

- Bexleyheath;
- Bromley;
- Crayford;
- Dartford;
- Erith;
- Grays (including Purfleet and West Thurrock);

- Orpington/Petts Wood;
- Sidcup; and
- Swanley.

Bromley

A.16 Annex 1 of the London Plan names Beckenham, Bromley, Orpington, Penge, Petts Wood, Upper Norwood/Crystal Palace and West Whickham as towns in the London Borough of Bromley, although only Bromley, Orpington, Petts Wood and West Wickham lie in close proximity to the metropolitan Green Belt, albeit surrounded by wider suburban communities together forming part of the conurbation. Notable exceptions include the very close but distinct villages of Keston, separated from Orpington by Padmall Wood and Keston Common, and Pratt's Bottom, separated from Orpington by the wooded slopes of Chelsfield Hill.

A.17 In the south of the borough, Biggin Hill and London Biggin Hill Airport are not defined as towns in either the London Plan or the London Borough of Bromley's adopted Local Plan (2019); however the area is identified in the London Plan and Bromley Local Plan as 'potential Strategic Outer London Development Centre'. Furthermore, the settlement has a population of over 7,500.

A.18 To the north, the neighbouring London Borough of Bexley includes the Annex 1 town of Sidcup (merged with Foots Cray) in close proximity to the northeastern edge of the London Borough of Bromley. Open Green Belt land separates this neighbouring town from Bromley (via Chislehurst) and Orpington/Petts Wood (via St Mary Cray and St Paul's Cray). Bexleyheath is defined as a major centre in its Retail and Town Centre Technical Paper (2021) but Sidcup (merged with Foots Cray) lies directly between it and the Green Belt land within the London Borough of Bromley.

A.19 To the south west, the neighbouring London Borough Croydon includes the Annex 1 towns of New Addington in close proximity to the western edge of the London Borough of Bromley. Croydon is defined as a metropolitan centre in the London borough of Croydon's adopted Local Plan (2018) but New Addington lies directly between it and the Green Belt land within the London Borough of Bromley.

A.20 To the east lies Sevenoaks District. Sevenoaks District's Settlement Hierarchy, published as a standalone evidence based document in 2022, defines Edenbridge, Sevenoaks, Swanley and Westerham as towns, but only Swanley is sufficiently close to the London Borough of Bromley to be of relevance to the assessment of Purpose B.

A.21 To the south lies Tandridge District. Tandridge District's Settlement Hierarchy evidence base document (2018) names Caterham-on-the-Hill, Caterham Valley, Warlingham and Whyteleafe as tier 1 urban settlements, although only Caterham and Oxted are described as towns in the District's adopted Core Strategy (2008). All are a significant distance from Bromley's nearest and smaller urban areas, and therefore are not considered to be relevant to an assessment of Purpose B in the London Borough of Bromley.

A.22 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Bromley are:

- Bexleyheath;
- Biggin Hill/Biggin Hill Airport;
- Bromley;
- Croydon;
- New Addington;
- Orpington;
- Petts Wood;
- Sidcup;
- Swanley; and
- West Wickham.

Croydon

A.23 Annex 1 of the London Plan names Addiscombe, Coulsdon, Croydon, New Addington, Norbury, Purley, Selsdon, South Norwood, Thornton Health and Upper Norwood/Crystal Palace as towns in the London Borough of Croydon.

A.24 In the east, open Green Belt land lies between Addiscombe and Selsdon, Selsdon and New Addington and Selsdon and Biggin Hill/Biggin Hill Airport and West Wickham in the neighbouring London Borough of Bromley to the south east and east, respectively.

A.25 To the south lies Tandridge District and Reigate and Banstead District. Tandridge District's Settlement Hierarchy evidence base document (2018) names Caterham on the Hill, Caterham Valley, Warlingham and Whyteleafe as tier 1 urban settlements, all of which lie on the southern edge of the borough. Although only Caterham and Oxted are described as towns in the District's adopted Core Strategy

(2008), all four of the settlements are almost merged together and to the Greater London conurbation via ribbon development along the roads that connect them. However, open Green Belt land also lies between, namely between Caterham and Coulsdon (including Old Coulsdon), Coulsdon (including Old Coulsdon) and Warlingham and Whyteleafe and Purley and Selsdon (via Hamsey Green, Kenley and Sanderstead) and Warlingham and Whyteleafe.

A.26 To the west, open Green Belt land sits between Coulsdon and Banstead in the neighbouring borough of Reigate and Banstead. The Reigate and Banstead Local Plan Core Strategy (2014) identifies Banstead as a town centre, which is merged with the wider urban area of Burgh Heath and Nork to the west. The Core Strategy also refers to Banstead as a village; however, it is noted that the settlement has a population over 7,500. The Reigate and Banstead Local Plan Core Strategy (2014) also identifies Redhill and Reigate as towns, which is merged with the wider urban area of Merstham to the north. To the south, open land lies between Coulsdon and Redhill/Reigate.

A.27 To the north, open Green Belt land sits between the northern edge of Coulsdon and the neighbouring towns of Sutton and Carshalton (both via Carshalton Beeches and Carshalton-on-the-Hill) in the neighbouring London Borough of Sutton.

A.28 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Croydon are:

- Addiscombe;
- Banstead/Burgh Heath/Nork;
- Biggin Hill/Biggin Hill Airport;
- Carshalton;
- Caterham on the Hill/Caterham Valley;
- Coulsdon (including Old Coulsdon);
- Croydon;
- New Addington;
- Purley;
- Redhill/Reigate;
- Selsdon;
- Sutton;
- Warlingham/Whyteleafe; and

- West Wickham.

Ealing

A.29 Annex 1 of the London Plan names Acton, Ealing, Greenford, Hanwell, Old Oak High Street and Southall as towns in the London Borough of Ealing. The advanced emerging Ealing Local Plan (submitted for examination 2024) also names Northolt and Perivale as towns. Only Greenford, Northolt and Southall lie in close proximity to metropolitan Green Belt land. Only a small area of open Green Belt land lies partially between the largely merged towns of Greenford and Northolt in the borough at Marnham Fields.

A.30 In the north west of the borough, the town boundary of Northolt lies either side of the A40, including and surrounding the open spaces of Rectory Park, Northolt Golf Course and Northala Fields, all of which are designated as Green Belt. Its southern boundary follows Owen/Maple Road, marking the boundary with Yeading in the neighbouring London Borough of Hillingdon. Although Yeading is not defined as an Annex 1 town, or town in the adopted Hillingdon Local Plan (2012), it represents an important connecting urban area between the Annex 1 town of Hayes in the London Borough of Hillingdon and Greenford in the London Borough of Ealing. Consequently, the open Green Belt land east of the Grand Union Canal, east of Yeading and west of Greenford, partially maintains separation between Greenford and the neighbouring Annex 1 town of Hayes in the neighbouring London Borough of Hillingdon.

A.31 Open Green Belt land to the north of Yeading, containing and surrounding the West London Shooting Grounds, maintains separation between Greenford and Ruislip in the neighbouring London Borough of Hillingdon. Open Green Belt land west of Northolt, containing Islip Manor Meadows and Lime Tree Golf Course partially maintains separation between Northolt and the neighbouring Annex 1 town of Ruislip in the neighbouring London Borough of Hillingdon.

A.32 In the west, open Green Belt land containing Minet Country Park lies between Southall and the London Plan Annex 1 town of Hayes in the neighbouring London Borough of Hillingdon.

A.33 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Ealing are:

- Greenford;
- Hayes;

- Northolt;
- Ruislip; and
- Southall.

Enfield

A.34 Annex 1 of the London Plan names Angel Edmonton, Edmonton Green, Enfield Town, Palmers Green and Southgate as towns in the London Borough of Enfield, although none have notable areas of open Green Belt land separating them.

A.35 The London Borough of Enfield's advanced emerging Local Plan includes plans to create a new large settlement at Crews Hill (including roughly 5,500 new homes) which, if adopted, would result in the creation of a new town (in Green Belt terms) close to the existing urban edge of Enfield. Prior to the formal adoption of the new Enfield Local Plan, Crews Hill is not defined as a neighbouring Green Belt town.

A.36 Hadley Wood in the west of the borough sits in between the towns of Southgate and neighbouring Barnet (both via Cockfosters) and Potters Bar (in neighbouring Hertsmere Borough). Hadley Wood has a narrow physical connection to the main metropolitan area along Cockfosters Road, but is generally separated by open Green Belt land comprised of Monken Hadley Common and Hadley Wood Golf Course. The population of the urban area of Hadley Wood north of these open spaces is less than 7,500 in the 2021 Census, so this urban area is not defined as a town in its own right. However, the urban area lies in the centre of open wider gaps between the neighbouring towns of New Barnet (in the neighbouring London Borough of Barnet) and Potters Bar. Hertsmere Borough Council's adopted Core Strategy (2013) names Potters Bar as a town.

A.37 In the east of the borough and beyond, open Green Belt land in the Lee Valley maintains separation of Edmonton Green and Enfield Town with the London Plan Annex 1 town of Chingford (comprised of North Chingford and South Chingford) in the neighbouring London Borough of Waltham Forest.

A.38 To the north east, the neighbouring towns of Waltham Cross merged with Cheshunt (in neighbouring Broxbourne Borough) and Waltham Abbey (in neighbouring Epping Forest District) are both identified as market towns in their respective adopted Local Plans.

A.39 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Enfield are:

- Chingford;

- Edmonton Green;
- Enfield Town;
- New Barnet;
- Potters Bar;
- Waltham Abbey; and
- Waltham Cross/Cheshunt.

Haringey

A.40 Annex 1 of the London Plan names Bruce Grove/Tottenham High Road, Crouch End, Finsbury Park, Green Lanes, Muswell Hill, West Green Road/ Seven Sisters, Tottenham Hale and Wood Green as towns, but only Tottenham borders the metropolitan Green Belt at the eastern edge of the borough.

A.41 To the east, the open Green Belt land within the borough west of Pymmes Brook and the River Lee Navigation separates Tottenham from the Annex 1 town of Walthamstow in the London Borough of Waltham Forest.

A.42 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Haringey are:

- Tottenham; and,
- Walthamstow.

Harrow

A.43 Annex 1 of the London Plan names Edgware, Harrow, Kenton, Kingsbury, North Harrow, Pinner, Rayners Lane, South Harrow, Stanmore and Wealdstone as towns. The same towns are referenced in Harrow's advanced merging Local Plan (2024). The only notable area of open Green Belt land between these towns surrounds Pinner Park Farm within the urban area in between Pinner and Wealdstone.

A.44 To the north east lies Hertsmere Borough. Hertsmere Borough Council's adopted Core Strategy (2013) names Borehamwood, Bushey, Potters Bar and Radlett as towns. Open Green Belt land separates Bushey at the boroughs northern boundary from the urban area of Harrow, with Borehamwood further to the north east north of Barnet.

A.45 To the north lies Three Rivers District. Open Green Belt land separates Pinner in the London Borough of Harrow from South Oxhey and Watford beyond. Three Rivers District's adopted Core Strategy (2011) settlement hierarchy names South Oxhey (merged with Carpenders Park) at the northern edge of the borough as a key or district centre. It is not described as a town in the Core Strategy; however, it has a population of over 7,500. Furthermore, it lies directly between the urban edges of the London Boroughs of Harrow and Hillingdon and the larger town of Watford, in Watford District, in close proximity to South Oxhey's northern boundary.

A.46 To the west lies the London Borough of Hillingdon. A small area of open Green Belt land comprised of Pinnerwood Park and Pinner Hill Golf Club separates Pinner in the London Borough of Harrow from northern part of the Annex 1 town of Northwood in Hillingdon.

A.47 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Harrow are:

- Bushey;
- Borehamwood;
- Northwood;
- Pinner;
- South Oxhey;
- Stanmore;
- Watford; and
- Wealdstone.

Havering

A.48 Annex 1 of the London Plan names Collier Row, Elm Park, Harold Hill (including Harold Wood), Hornchurch, Rainham, Romford (including Emerson Park and Gidea Park) and Upminster (including Cranham) as towns in the London Borough of Havering. Open Green Belt land lies directly between Collier Row and Harold Hill, Romford (via Emerson Park) and Upminster (via Cranham) and Hornchurch and Upminster. Open Green Belt land also lies between these towns and the neighbouring Annex 1 towns of Chadwell Heath and Dagenham in the London Borough of Barking and Dagenham to the west.

A.49 To the west, Hainault in the neighbouring London Borough of Redbridge is not defined in Annex 1 of the London Plan as a town; however, Policy LP34 of the

London Borough of Redbridge's adopted Local Plan (2018) refers to the Green Belt as playing an important role in preventing the merging of 'Barkingside with Hainault'. Furthermore, the population of Hainault in the 2021 Census was considerably larger than 7,500.

A.50 To the south, the town of Grays in neighbouring Thurrock neighbours the urban edges of Rainham and Upminster in the London Borough of Havering. Thurrock's adopted Local Plan (2015) identifies Grays as the only town within the borough, but acknowledges it forms part of a wider conurbation of centres including Aveley/Kennington, Purfleet and South Ockendon, all of which in isolation have populations of over 7,500 in the 2021 Census.

A.51 To the north east, the town of Brentwood in neighbouring Brentwood Borough lies close to the urban edge of Harold Hill/Harold Park in the London Borough of Havering. Policy MG03 in Brentwood Borough's adopted Local Plan (2022) identifies Brentwood as the only town within the borough. In addition, the allocation and consent of Dunton Hills Garden Village beyond the smaller developed areas of Codham Hall industrial estate and West Hordon to the east of the London Borough of Havering in neighbouring Brentwood Borough has narrowed the robust gap with Basildon (in Basildon Borough) and Havering, such that Basildon is also considered as a relevant neighbouring town.

A.52 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Havering are:

- Basildon;
- Brentwood;
- Chadwell Heath;
- Collier Row;
- Dagenham;
- Elm Park;
- Grays (including Aveley/Kennington, Purfleet and South Ockendon);
- Hainault;
- Harold Hill (including Harold Wood);
- Hornchurch;
- Rainham;
- Romford (including Emerson Park and Gidea Park); and

- Upminster (including Cranham).

Hillingdon

A.53 The Hillingdon Local Plan Part 1 (2012) only names Uxbridge as a town centre and describes the boroughs other district, minor and local centres collectively as 'neighbourhood centres'. However, Annex 1 of the London Plan names Eastcote, Hayes, Northwood, Ruislip, West Dayton/Yiewsley and Uxbridge as town centres. These settlements are broadly consistent with the Hillingdon Local Plan Part 2 (2020) town centre hierarchy which names Uxbridge as the only 'metropolitan centre' and Eastcote, Green Lane (Northwood), Hayes, Ruislip and West Dayton/Yiewsley as 'district centres'. Other settlements are named in the Hillingdon Local Plan Part 2 (2020) town centre hierarchy as 'minor centres' and 'local centres', which are considered to be too small in isolation to be considered standalone towns in Green Belt terms, but generally form part of wider urban areas defined as towns. The 'minor centres' of Ruislip Manor, Northwood Hills and Uxbridge Road Hayes are considered to be form part of the wider urban towns of Ruislip, Northwood and Hayes, respectively.

A.54 Although the urban areas of Cowley, Colham Green, Hayes End, Harlington (a local centre) and Heathrow Airport, Hillingdon (comprised of the local centres of North Hillingdon and Hillingdon Heath), Ickenham (a local centre) and Yeading (including the local centre along Willow Tree Lane) are not defined as towns they represent important connecting urban areas in between the large town centres such that some pockets of open Green Belt land, albeit often isolated from the wider open countryside, still maintain a degree of separation between towns within the London Borough of Hillingdon and neighbouring authority areas. Within the London Borough of Hillingdon these are:

- Open Green Belt land north of the M4 partially separates the southwestern edge of Hayes from the eastern edge of West Drayton.
- Stockley Country Park partially separates northern Hayes (via Hayes End) from West Drayton/Yiewsley.
- Open Green Belt land east and west of Cowley partially separates the northern edge of Yiewsley from the southern edge of Uxbridge.
- Open Green Belt land east and west of the River Pinn east of Uxbridge, including Dowding Park, Hillingdon Golf Course and Hillingdon and Uxbridge Cemeteries partially separate the eastern edge of Uxbridge from the connecting urban area of Hillingdon and the town Hayes beyond.

- Open Green Belt land south of the Northolt Aerodrome maintains separation between Hayes (via Hayes End and Yeading) and Ruislip and Uxbridge (via Hillingdon) and Ruislip.
- Open Green Belt land to the west and north west of Northolt Aerodrome partially maintains separation between Ruislip and the connecting urban area of Ickenham and the town of Uxbridge beyond.
- Open Green Belt land containing woodland south of Ickenham and Sports Grounds north of Uxbridge partially separate Uxbridge from the connecting urban area of Ickenham and the town of Ruislip beyond.
- Open Green Belt land north of Ickenham Ruislip Golf Course and open fields beyond and partially separate Ruislip from the connecting urban area of Ickenham and the town of Uxbridge beyond.
- Open Green Belt land containing the Ruislip Woods National Nature Reserve and Northwood and Haste Hill Golf Courses maintain separation between Northwood and Ruislip.

A.55 The emerging plans to expand London Heathrow Airport to accommodate a third runway have not been considered in the assessment of Green Belt land in the London Borough of Hillingdon, given that the full details of this national infrastructure project have yet to be finalised and consented.

A.56 A number of contained open or developed areas of Green Belt land sit contained within the urban areas of specific towns or connecting urban areas such that they do not play a notable separating role between named towns including:

- Lake Farm Country Park within the urban area of Hayes.
- Brunel University Campus which is largely developed.
- Coney Green and the open playing fields of Bishshalt School within the connecting urban area of Hillingdon.
- Hayes Park within the urban area of Hayes and wider open Green Belt land within the connecting urban area of Hillingdon.
- Oak Wood School and Swakeleys School open playing fields, Home Covert Wood and Pole Hill Open Space within the connecting urban area of Hillingdon.
- Hillingdon Court Park within the connecting urban area of Hillingdon.
- Sacred Heart Primary School open playing fields within the town of Ruislip.
- Swakeleys Park and the contain wooded banks of the River Pinn directly to the north and south within the connecting urban area of Ickenham.

- King George V Playing Fields and Ickenham Cricket Club within the connecting urban area of Ickenham.
- The neighbouring towns of Eastcote and Northwood in the London Borough of Hillingdon and Pinner in the neighbouring London Borough of Harrow are largely merged such that the open Green Belt land at Haydon Hall Meadows and directly north of it play no notable separating role.

A.57 Harefield is described as a village and 'local centre' in adopted Local Plan Part 1 (2012) and Part 2 (2020) and has a population below 7,500 and so is not defined as a town in Green Belt terms. However, the Green Belt that surrounds the village forms part of a wider gap between other neighbouring towns.

A.58 Open Green Belt land around the village of Harefield in the north west of the borough maintains separation between the towns of Northwood, Ruislip and Uxbridge in the London Borough of Hillingdon with the neighbouring town of Rickmansworth to the north within Three Rivers District. Rickmansworth is named as the Principal Town in the Three Rivers District's adopted Core Strategy (2011).

A.59 Open Green Belt land south of the village of Harefield and west of Ickenham maintains separation between the towns of Ruislip and Uxbridge (via Ickenham) in the Londin Borough of Hillingdon with the neighbouring town of Gerrards Cross/Chalfont Saint Peter to the west within Buckinghamshire. Although the town lies a significant distance away the smaller intervening settlements of Denham, Denham Green, Higher Denham and Tatling End have a narrowing influence along connecting roads and railway lines. Gerrards Cross/Chalfont Saint Peter is named in the South Buckinghamshire Core Strategy (2011) as a Principal Settlement.

A.60 In the east of the borough, three pockets of open Green Belt land play a partial role in maintaining separation between towns in the London Borough of Hillingdon and towns in the neighbouring London Borough of Ealing:

- Open Green Belt land containing Islip Manor Meadows and Lime Tree Golf Course partially maintain separation between Ruislip and the neighbouring Annex 1 town of Northolt in the neighbouring London Borough of Ealing.
- Open Green Belt land either side of Yeading Brook and the Grand Union Canal to the south and east of Yeading partially maintain separation between Hayes and the neighbouring Annex 1 town of Greenford in the neighbouring London Borough of Ealing.
- Minet Country Park partially separates Hayes and the London Plan Annex 1 town of Southall in the neighbouring London Borough of Ealing.

A.61 In the south west of the borough, open Green Belt land maintains separation between the towns of Uxbridge (via Cowley) and West Drayton/Yiewsley in the London Borough of Hillingdon from the neighbouring town of Slough in the neighbouring borough of Slough.

A.62 The open Green Belt land north west and west of Heathrow Airport is largely safeguarded for the expansion of Heathrow Airport and the construction of a third runway such that the remaining open Green Belt land in this part of the London Borough of Hillingdon will likely play a limited role in maintaining separation between Greater London and the town of Slough via the smaller urban areas of Colnbrook and Poyle in the borough of Slough.

A.63 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Hillingdon are:

- Gerrards Cross/Chalfont Saint Peter;
- Greenford;
- Hayes (including the minor centre of Uxbridge Road, Hayes);
- Northolt;
- Northwood (including the district centre of Green Lane and the minor centre of Northwood Hills);
- Rickmansworth;
- Ruislip (including the minor centre of Ruislip Manor and local centre of South Ruislip);
- Slough;
- Southall;
- West Dayton/Yiewsley; and
- Uxbridge.

Hounslow

A.64 Annex 1 of the London Plan names Brentford, Chiswick, Feltham High Street and Hounslow as towns, although only Hounslow (via Cranford and Hounslow West) and Feltham (merged with Bedfont) lie adjacent to the metropolitan Green Belt. The open Green Belt land north and south of the River Crane, including Hounslow Heath, maintains separation between Feltham and Hounslow.

A.65 In the north west of the borough, open Green Belt land separates Hounslow (via Cranford and Hounslow West) from the neighbouring Annex 1 towns of Hayes in the London Borough of Hillingdon to the north west and, to a lesser extent, Southhall in the London Borough of Ealing.

A.66 In the south of the borough, open Green Belt land separates Feltham in the London Borough of Hounslow and Sunbury-on-Thames in neighbouring Spelthorne Borough from Whitton and Teddington (via the connecting urban areas of Hampton and Hanworth), Annex 1 towns in the neighbouring London Borough of Richmond. The adopted Richmond-upon-Thames Local Plan (2018) consistently defines the same centres as the London Plan.

A.67 In the southwest of the borough, a thin band of open Green Belt land containing Bedfont Lakes Country Park separates Feltham (merged with Bedfont) from the merged urban areas of Sunbury-on-Thames, Ashford and Stanwell in the neighbouring borough of Spelthorne, which are in turn only separated from the Staines-upon-Thames (also in Spelthorne Borough) by the A308. The advanced emerging Spelthorne Local Plan (2024) refers to Staines-upon-Thames as the main town in Spelthorne Borough, with Ashford and Sunbury being named district centres. Both Ashford and Sunbury contain populations greater than 7,500 and are therefore large enough to be considered to be standalone towns; however, their proximity and connection to the town of Staines-upon-Thames directly to the west limits the significance of their standalone definition as towns given the loss of open countryside between them and Feltham would by association still merge Feltham with Staines-upon-Thames.

A.68 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Hounslow are:

- Ashford;
- Hayes;
- Hounslow;
- Feltham;
- Southall;
- Staines-upon-Thames;
- Sunbury-on-Thames;
- Teddington; and
- Whitton.

Kingston

A.69 Annex 1 of the London Plan names Kingston, New Malden, Surbiton and Tolworth as towns in the Royal London Borough of Kingston. None lie directly adjacent to the Green Belt but are contiguous with wider urban areas that do, namely Chessington, Hook and Long Ditton, all of which form part of the large built-up area.

A.70 To the west in the neighbouring borough of Elmbridge, Walton-on-Thames is the only urban area considered to be a town in the borough's adopted Core Strategy (2011). Although not directly adjacent to the urban area in Kingston, the smaller district settlements of Esher and the largely merged villages of Claygate and Hinchley Wood lie directly in between the two neighbouring towns, such that there is limited open countryside maintaining separation between the urban area of Tolworth (via Chessington and Hook) and Walton-on-Thames. In addition, to the south west, the district centres of Cobham merged with Oxshott lie on the periphery of this gap. Cobham has a population greater than 7,500.

A.71 To the east in the neighbouring borough of Epsom and Ewell, the Council's advanced emerging Local Plan names Epsom as the only town, merged with the neighbouring urban village of Ewell and the wider conurbation to the north. Open Green Belt land lies between Tolworth (via Chessington and Hook) and Epsom. Several significant urban areas south of Horton Country Park and east and west of Horton Lane (all of which are planned to be released and inset within the Green Belt in Epsom and Ewell's advanced emerging Local Plan) have narrowed the gap, reducing the open countryside maintaining separation between Tolworth and Epsom.

A.72 To the south in the neighbouring district of Mole Valley, Leatherhead is defined as a principle town in the District's adopted Local Plan (2024). Leatherhead almost forms a continuous urban area with the neighbouring suburban villages of Ashtead, Bookham and Fetcham, all of which have populations over 7,500 and so are collectively defined as a town for the purposes of this assessment. Again, the district centre of Cobham merged with Oxshott in the neighbouring borough of Elmbridge lie on the periphery of this gap.

A.73 In summary, the towns relevant to the assessment of Green Belt land within the Royal London Borough of Kingston are:

- Cobham (merged with Oxshott);
- Epsom;
- Esher (merged with Claygate and Hinchley Wood);
- Leatherhead (merged with Ashtead, Bookham and Fetcham);

- Tolworth; and
- Walton-on-Thames.

Newham

A.74 Annex 1 of the London Plan names Canning Town, East Beckton, Forest Gate, Gallions Reach, Green Street and Stratford as towns, but only Forest Gate lies adjacent to the metropolitan Green Belt.

A.75 Open Green Belt land in the Borough is limited to Manor Park Flats and the City of London Cemetery at its northernmost end. This Green Belt land does not maintain separation between towns within the London Borough of Newham but forms part of a wider area of open Green Belt land surrounding the smaller urban area of Aldersbrook in the London Borough of Redbridge that maintains separation between Forest Gate and the neighbouring Annex 1 towns of Gants Hill to the north east and Wanstead to the north, both in the London Borough of Redbridge, and Leytonstone to the north west in the London Borough of Waltham Forest.

A.76 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Newham are:

- Forest Gate;
- Gants Hill;
- Ilford;
- Leytonstone; and
- Wanstead.

Redbridge

A.77 Annex 1 of the London Plan names Barkingside, Gants Hill, Ilford, Woodford and Wanstead as towns. The London Borough of Redbridge's adopted Local Plan (2018) consistently defines the same urban areas. In addition, Policy LP34 in the London Borough of Redbridge's adopted Local Plan (2018) refers to the Green Belt as playing an important role in preventing the merging of 'Barkingside with Hainault'. The population of Hainault in the 2021 Census is larger than 7,500 and so this largely distinct urban area is also defined as a town in Green Belt terms, despite only containing a local centre.

A.78 The open Green Belt land to the east (Fairlop Waters Country Park) and west (Claybury Park and Hospital Hill Wood) of Fairlop and Fulwell Cross separates what remains of the gap between Barkingside and Hainault in the London Borough of Redbridge. The larger area of open Green Belt land to the east also separates Barkingside and Hainault from the neighbouring Annex 1 towns of Chadwell Heath/Marks Gate to the south east in the neighbouring London Borough of Barking and Dagenham and Collier Row to the east in the neighbouring London Borough of Havering.

A.79 In the centre of the borough, the narrow section of open Green Belt land in the Roding Valley maintains separation between the merged towns of Wanstead and Woodford in the west of the borough, the merged towns of Barkingside and Gants Hill (via Redbridge and Clayhall) in the centre of the borough and Hainault (via Woodford Bridge) in the north of the borough.

A.80 In the north, contained open Green Belt land in Lords Bushes and Knighton Wood partially separates Woodford the neighbouring settlement of Buckhurst Hill, and Loughton beyond, in the neighbouring District of Epping Forest. Epping Forest District's Local Plan (2023) identifies Loughton and Waltham Abbey as towns and Buckhurst Hill as a large village and district centre. Buckhurst Hill has a population of over 7,500 and sits in what remains of the gap between Woodford in the London Borough of Redbridge, Chingford in the neighbouring London Borough of Waltham Forest and Loughton in the neighbouring District of Epping Forest.

A.81 In the north west and west, open Green Belt land in the borough separates Wanstead and Woodford from the neighbouring Annex 1 towns of Chingford, Highams Park, Leytonstone, and Walthamstow in the London Borough of Waltham Forest.

A.82 In the south west of the borough, open Green Belt land surrounding the smaller urban area of Aldersbrook maintains separation between Wanstead and Gants Hill/Ilford in the London Borough of Redbridge and the neighbouring Annex 1 towns of Leytonstone to the west in the London Borough of Waltham Forest and Forest Gate to the south in the London Borough of Newham.

A.83 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Redbridge are:

- Barkingside;
- Buckhurst Hill;
- Chadwell Heath;
- Chingford;

- Collier Row;
- Forest Gate;
- Gants Hill;
- Hainault;
- Highams Park;
- Ilford;
- Leytonstone;
- Loughton;
- Woodford;
- Wanstead; and
- Walthamstow.

Richmond

A.84 Annex 1 of the London Plan names East Sheen, Richmond, Teddington, Twickenham and Whitton as towns, but only Whitton and Teddington (via the connecting urban areas of Hampton and Hanworth) lie in close proximity to the metropolitan Green Belt. The adopted Richmond-upon-Thames Local Plan (2025) consistently defines the same centres as the London Plan.

A.85 The limited open Green Belt land in the far west of the borough, west Whitton and Teddington (via Hampton), maintain separation between the neighbouring towns of Feltham (an Annex 1 town) in the neighbouring London Borough of Hounslow and Sunbury-on-Thames in the neighbouring borough of Spelthorne. The advanced emerging Spelthorne Local Plan (2024) refers to Staines-upon-Thames as the main town in Spelthorne Borough, with Sunbury-on-Thames being named as a district centre. Sunbury-on-Thames contains a population greater than 7,500, but its proximity and connection to the town of Staines-upon-Thames directly to the west limits the significance of its standalone definition as a town, i.e. the further loss of open countryside between Sunbury-on-Thames and Teddington (via Hampton) would, by association, merge the urban area within the London Borough of Richmond with Staines-upon-Thames.

A.86 Finally, the limited open Green Belt land within the Hampton Water Treatment Works south of Hampton maintains what remains of the limited separation between Teddington (via Hampton) and the neighbouring district centre of Molesey in the

neighbouring borough of Elmbridge. Elmbridge Borough's adopted Core Strategy (2011) only names Walton-on-Thames as a town, but Molesey is classified as a district centre. Molesey has a population greater than 7,500 and although it forms part of the wider Greater London conurbation, it is considered sufficiently separated from Teddington by Bushy Park (designated as Metropolitan Open Land), the River Thames and Hurst Park to be considered a standalone town in Green Belt terms.

A.87 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Richmond are:

- Feltham;
- Molesey;
- Staines-on-Thames;
- Sunbury-on-Thames;
- Teddington; and
- Whitton.

Sutton

A.88 Annex 1 of the London Plan names Carshalton, Cheam, Hackbridge, North Cheam, Rosehill, Sutton, Wallington and Worcester Park as towns in the London Borough of Sutton, although only Carshalton and Sutton (via Belmont, Carshalton Beeches and Carshalton-on-the-Hill) are close to the metropolitan Green Belt. No open Green Belt land sits in between the towns within the borough.

A.89 To the south, open Green Belt land sits between Carshalton and Sutton (via Belmont, Carshalton Beeches and Carshalton-on-the-Hill) and Coulsdon and Purley (London Plan Annex 1 towns in the neighbouring London Borough of Croydon) and Banstead (in the neighbouring borough of Reigate and Banstead). The Reigate and Banstead Local Plan Core Strategy (2014) identifies Banstead as a town centre, which is merged with the wider urban area of Burgh Heath and Nork to the west. The Core Strategy also refers to Banstead as a village; however, it is noted that the settlement has a population over 7,500.

A.90 To the west, open Green Belt land sits in between Sutton (via Belmont) and Epsom in the neighbouring borough of Epsom and Ewell. Epsom and Ewell Borough's advanced emerging Local Plan names Epsom as the only town, merged with the neighbouring urban village of Ewell and the wider conurbation to the north.

A.91 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Sutton are:

- Banstead/Burgh Heath/Nork;
- Carshalton;
- Coulsdon (including Old Coulsdon);
- Epsom;
- Purley; and
- Sutton.

Waltham Forest

A.92 Annex 1 of the London Plan names Bakers Arms, Highams Park, Leyton, Leytonstone, North Chingford, South Chingford, Walthamstow and Wood Street as towns in the London Borough of Waltham Forest. Open Green Belt land between these towns is limited to the land south of Walthamstow Avenue in between the largely merged South Chingford and Walthamstow and Wood Street.

A.93 To the west, the metropolitan Green Belt separates these towns from the neighbouring Annex 1 towns of Edmonton Green and Enfield Town in the London Borough of Enfield, Stamford Hill in the London Borough of Hackney and Tottenham Hale (Tottenham) in the London Borough of Harringay.

A.94 To the east, the metropolitan Green Belt separates these towns from the neighbouring Annex 1 towns of Woodford and Wanstead in the London Borough of Redbridge.

A.95 To the north east, the metropolitan Green Belt separates Chingford from the neighbouring settlements of Buckhurst Hill, Loughton and Waltham Abbey in the neighbouring District of Epping Forest. Epping Forest District's Local Plan (2023) identifies Loughton and Waltham Abbey as towns and Buckhurst Hill as a large village and district centre. Buckhurst Hill has a population of over 7,500 and sits in what remains of the gap between Chingford and Loughton.

A.96 In summary, the towns relevant to the assessment of Green Belt land within the London Borough of Waltham Forest are:

- Edmonton Green;
- Enfield Town;

- Highams Park;
- Leytonstone;
- Loughton/Buckhurst Hill;
- North Chingford;
- South Chingford;
- Stamford Hill;
- Tottenham Hale (Tottenham);
- Waltham Abbey;
- Walthamstow (including Wood Street);
- Wanstead; and
- Woodford.

Appendix B
Study Context

B.1 Appendix B puts the methodology in context, describing the metropolitan Green Belt and relevant national and regional planning policy and guidance.

The history of the metropolitan Green Belt

B.2 The metropolitan Green Belt as a standalone concept was first suggested by Raymond Unwin in 1933 as a 'green girdle'. In 1935 the London County Council put forward a scheme 'to provide a reserve supply of public open spaces and of recreational areas and to establish a Green Belt or girdle of open space lands, not necessarily continuous, but as readily accessible from the completely urbanised area of London as practicable'. This arrangement was formalised by the 1938 Green Belt (London and Home Counties) Act, under which 14,400 hectares of land around London were purchased by the London County Council and adjacent counties, both individually and jointly.

B.3 During the Second World War, the newly formed Ministry of Town and Country Planning commissioned an advisory plan for the future growth of Greater London. The Ministry gave its formal approval the plan's Green Belt proposals and the 1947 Town and Country Planning Act enabled local authorities to protect Green Belt land without acquiring it.

B.4 In 1955 the Government established (through Circular 42/55) the three main functions of the Green Belt as:

- checking growth of large built-up areas;
- preventing neighbouring settlements from merging; and
- preserving the special character of towns.

B.5 Emphasis on the strict control of development and the presumption against building in the Green Belt except in special circumstances was set out through further Government Green Belt guidance in 1962. The essential characteristic of Green Belts as permanent with boundaries only to be amended in exceptional circumstances was established through Circular 14/84.

B.6 The Greater London Development Plan, approved in 1976, defined the full extent of the London Metropolitan Green Belt. It stated that 'The Green Belt gives definition to the built-up area as a whole, limits urban sprawl and provides an area where open

recreational activities can take place. At the same time it plays an important role in the retention of areas of attractive landscape on London's fringes'.

B.7 In January 1988 PPG (Planning Policy Guidance Note) 2, Green Belts (subsequently replaced in 1995 and further amended in 2001) explicitly extended the original purposes of the Green Belt to add:

- to safeguard the surrounding countryside from further encroachment; and
- to assist in urban regeneration (subsequently replaced in 1995 and further amended in 2001).

B.8 PPG2 was replaced through the publication of the National Planning Policy Framework (NPPF) in March 2012. The NPPF has been revised and re-published in July 2018 and in February 2019, July 2021, December 2023 and December 2024, and this currently sets out national Green Belt and grey belt policy.

The London metropolitan Green Belt today

B.9 The metropolitan Green Belt covers over five hundred thousand hectares (ha), accounting for roughly a third of all Green Belt land in England, across 68 local authorities in Greater London, the East and South East of England. Within Greater London 18 boroughs contain Green Belt land, covering over 34,750ha (roughly 7%) of the metropolitan Green Belt, but over 20% of the total area of Greater London. Table B.1 shows how much Green Belt each of the 18 London boroughs contain.

Table B.2: Green Belt Area in London boroughs

London Borough	Green Belt area (rounded to nearest 10 hectares)
Barking and Dagenham	530
Barnet	2,390
Bexley	1,120
Bromley	7,650
Croydon	2,190
Ealing	310

London Borough	Green Belt area (rounded to nearest 10 hectares)
Enfield	3,070
Haringey	60
Harrow	1,090
Havering	6,050
Hillingdon	4,870
Hounslow	1,230
Kingston	640
Newham	80
Redbridge	1,920
Richmond	130
Sutton	610
Waltham Forest	840
Total	**34,780**

B.10 Figure B.1 illustrates the extent of the metropolitan Green Belt and accessible open space within Greater London, the constituent London Boroughs containing Green Belt land and neighbouring boroughs and districts in the wider metropolitan Green Belt immediately beyond Greater London.

B.11 This vast area of predominately open countryside plays an important and increasingly active role in conserving and enhancing the capital's and surrounding satellite settlement's diversity of character, history, nature, identity and economy.

B.12 Figures B.2 and B.3 illustrate the NPPF footnote 7 designations identified to date within Greater London. They are shown on two separate maps to improve their readability.

Figure B.1: Extent of the metropolitan Green Belt and accessible open space London and neighbouring local authorities

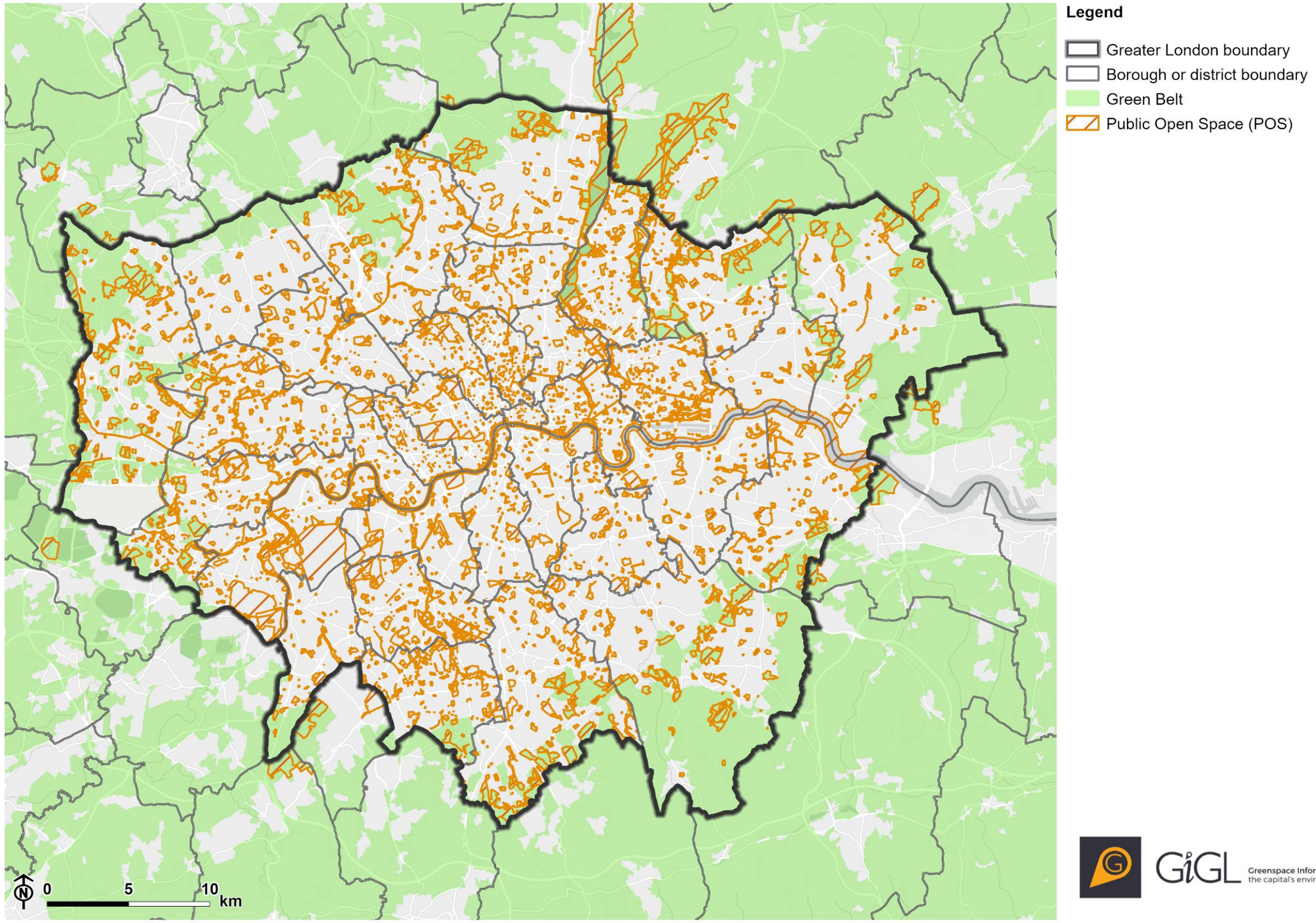

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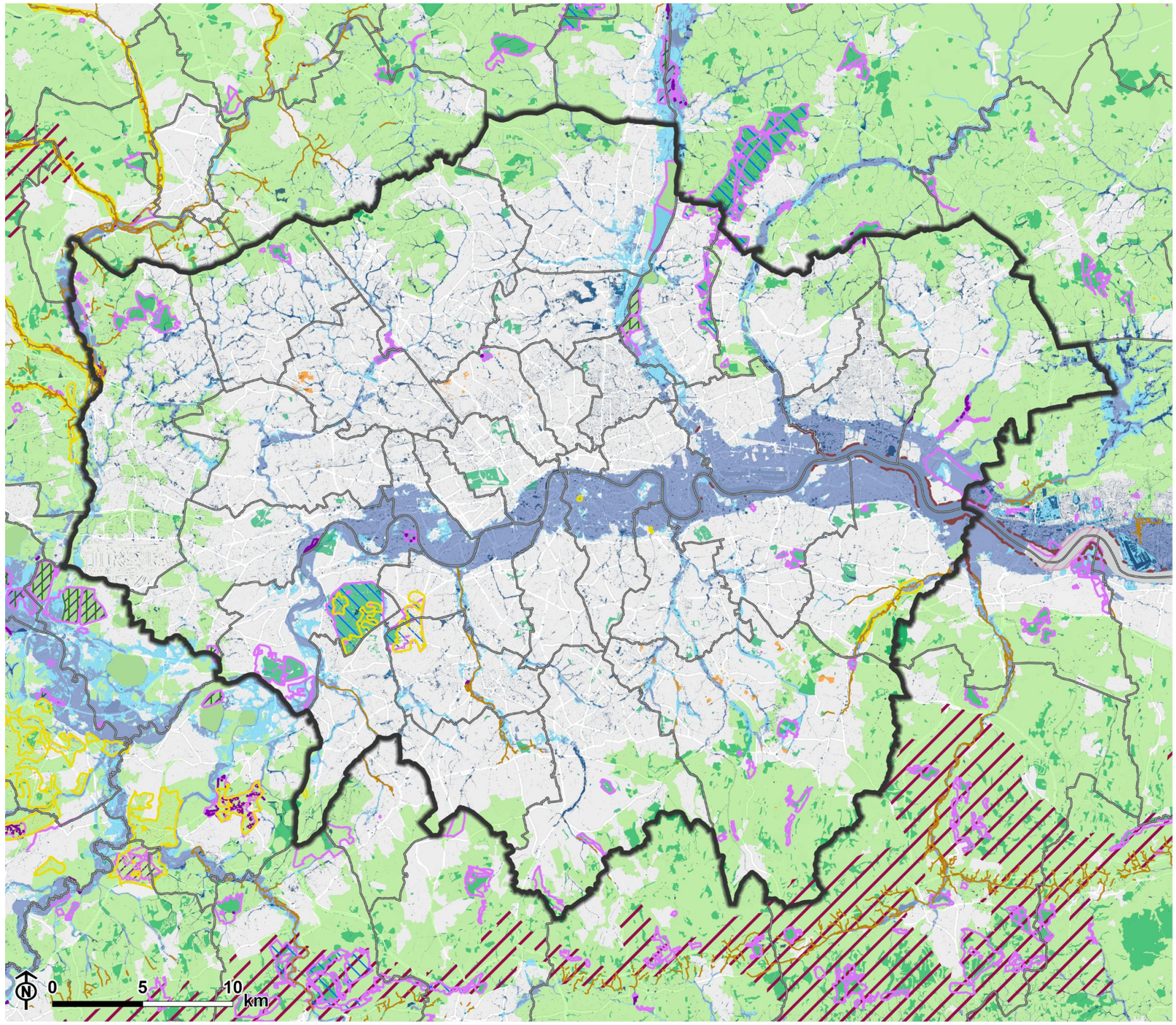
Figure B.2: Ecological, recreational and flooding NPPF footnote 7 areas and assets in London and neighbouring local authorities



Legend

- Greater London boundary
- Borough or district boundary
- Green Belt

NPPF Footnote 7 designations

- Chalk river
- Special Area of Conservation
- Special Protection Area
- Ramsar site
- Site of Special Scientific Interest
- Ancient woodland
- Saltmarsh
- Lowland fens
- Peaty soil
- National Landscape
- Local Green Space
- Marine Conservation Zone
- High risk of surface water flooding
- Flood zone 2
- Flood zone 3

NPPF Footnote 7 designations:
NPPF Footnote 7 designations not listed and mapped in this figure are generally not located within Greater London or local data sets were not readily available. Listed Buildings have not been included to improve legibility. These assets may provide a strong reason for refusing or restricting development and should therefore be reviewed separately. The locations of these assets are illustrated in parcel proforma.

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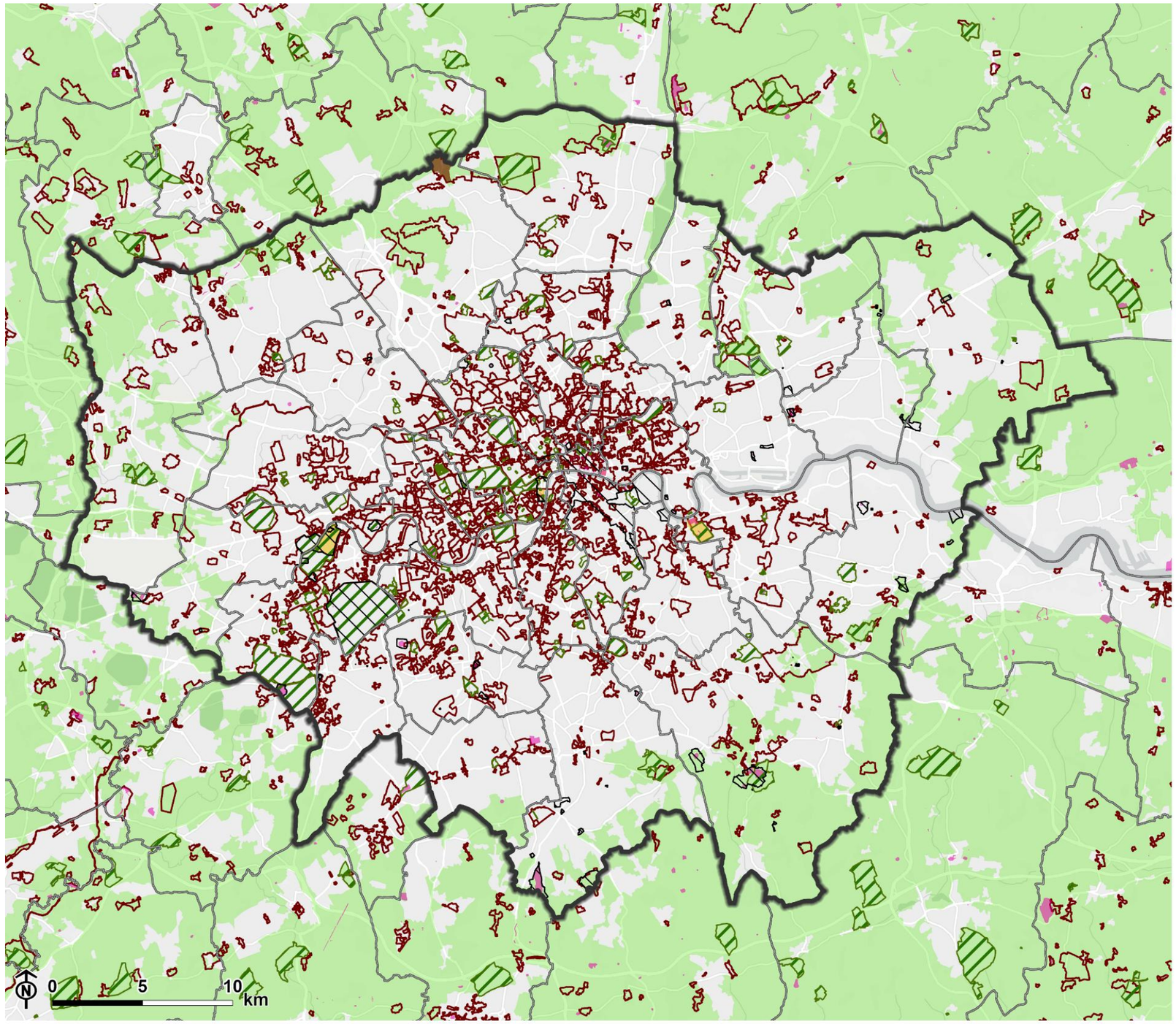
Figure B.3: Historic NPPF footnote 7 areas and assets in London and neighbouring local authorities



Legend

- Greater London boundary
- Borough or district boundary
- Green Belt

NPPF Footnote 7 designations - historic designations

- Conservation area
- Greater London Archaeological Priority Area (APA) - Tier 1
- Registered Parks and Gardens
- Scheduled monument
- Registered battlefield
- World Heritage Site

NPPF Footnote 7 designations:
NPPF Footnote 7 designations not listed and mapped in this figure are generally not located within Greater London or local data sets were not readily available. Listed Buildings have not been included to improve legibility. These assets may provide a strong reason for refusing or restricting development and should therefore be reviewed separately. The locations of these assets are illustrated in parcel proforma.

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National Green Belt policy

B.13 Government policy on the Green Belt and grey belt is set out in chapter 13 of the NPPF 'Protecting Green Belt Land' **[See reference 13]**.

Aims and purposes

B.14 Paragraph 142 of the NPPF states that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'.

B.15 This is elaborated in NPPF paragraph 143, which states that Green Belts serve five purposes, as set out below:

a) to check the unrestricted sprawl of large built-up areas;

b) to prevent neighbouring towns merging into one another;

c) to assist in safeguarding the countryside from encroachment;

d) to preserve the setting and special character of historic towns; and

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Exceptional circumstances

B.16 The NPPF paragraph 145 states:

'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.'

B.17 Paragraph 146 goes on to state that 'where an authority cannot meet its identified need for homes, commercial or other development through other means…authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.'

B.18 Paragraph 147 states that authorities must examine fully all other reasonable options for meeting its identified need for development before exceptional circumstances can be demonstrated. Notable reasonable alternatives include:

- ‘making as much use as possible of suitable brownfield sites and underutilised land;
- optimise the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- discuss with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.’

B.19 Paragraph 148 states that ‘Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework.’

Grey belt

B.20 ‘Grey belt’ is defined in Annex 2 of the NPPF as ‘land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.’

Green Belt boundaries

B.21 Paragraph 149 states that when defining Green Belt boundaries, plans should:

- demonstrate consistency with Local Plan strategy, most notably achieving sustainable development;
- not include land which it is unnecessary to keep permanently open;
- safeguard enough non-Green Belt land to meet development needs beyond the plan period; and,

- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Very special circumstances

B.22 Paragraphs 153 and 154 state that 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances… 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.'

Appropriate Green Belt development

B.23 New buildings are inappropriate in the Green Belt. There are exceptions to this which are set out in a closed list in paragraph 154:

- 'buildings for agriculture and forestry;
- the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages;
- limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites);
- limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt; and,
- Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

  i. mineral extraction;

ii. engineering operations;

iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;

iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;

v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

B.24 In addition, paragraph 155 states the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

- the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- there is a demonstrable unmet need for the type of development proposed;
- the development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.

Golden Rules

B.25 Paragraph 155 states homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where:

- The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- There is a demonstrable unmet need for the type of development proposed;
- The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and
- Where applicable the development proposed meets the ‘Golden Rules’ requirements set out below.

B.26 Where major development involving the provision of housing is proposed within or on land released from the Green Belt the following contributions should be made:

- affordable housing – in line with specifications set out in more detail in the NPPF and PPG.
- necessary improvements to local or national infrastructure; and
- the provision of new, or improvements to existing, green spaces that are accessible to the public.

Green Belt Planning Practice Guidance

B.27 The NPPF's Green Belt policies are supplemented by Planning Practice Guidance **[See reference 14]** (PPG, February 2025) on Green Belt planning and how to assess Green Belt land, which is particularly relevant to the methodology of this study.

B.28 The PPG sets out:

- the key steps in a Green Belt assessment, including:
  - defining the location and scale of the assessment area,
  - evaluating contribution to the Green Belt purposes,
  - considering areas and assets lists in NPPF footnote 7,
  - identifying grey belt land, and
  - determining if proposals would fundamentally undermine the five Green Belt purposes (taken together) of remaining Green Belt in the plan area;
- key considerations in assessing the contribution Green Belt land makes to Green Belt purposes A, B and D when identifying grey belt land;
- what release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;
- how to determine proposals on potential grey belt land;
- guidance on identifying sustainable locations in the Green Belt;
- golden rules for housing development including, how major housing development should contribute to accessible green space; and,
- how to consider the potential impact of development on the openness of the Green Belt.

B.29 The PPG makes it clear that strategic or local planning authorities, or appropriate groups of local planning authorities should produce a Green Belt assessment during the preparation or updating of all Local Plans, and Spatial Development Strategies that set the strategic context for the release of land where this would be required to meet development needs.

Assessing Green Belt land to identify grey belt land

B.30 Authorities must identify grey belt land as part of the necessary review and alteration of Green Belt boundaries in order to:

- sustainably prioritise it over other Green Belt locations through the plan-making process, and
- help determine planning applications on Green Belt land in line with paragraph 155.

B.31 The guidance is clear that 'where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt, or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the area's adopted Plan and the NPPF' (PPG Paragraph: 001 Reference ID: 64-001-20250225), including whether:

- development is sustainably located;
- whether it would meet the 'Golden Rules' contribution (where applicable); and
- whether there is a demonstrable unmet need for the type of development proposed.

The appropriate scale of Green Belt assessments

B.32 Authorities must identify an appropriate scale of Green Belt assessment that delivers clear variations in contribution to the Green Belt purposes, assessing all Green Belt land within a Plan area in the first instance and responding to local circumstances. Local circumstances may dictate, for example, the need for smaller assessment areas in areas where there is greater variation in contribution to the Green Belt purposes, or greater potential for sustainable development, such as around existing settlements or public transport hubs or corridors.

B.33 Green Belt land not judged to strongly contribute to any one of Green Belt purposes A, B and D has the potential to be identified as grey belt land. The assessment of variations in contribution to Green Belt purposes A, B and D must be informed by the criteria below.

B.34 Villages should not be defined as large built-up areas, towns or historic towns. Where there are no historic towns in or adjacent to a plan area, it may not be necessary to provide detailed assessments against Purpose D.

Grey belt assessment criteria

B.35 The PPG sets out illustrative criteria that should be considered when assessing the contribution of land to Green Belt purposes A, B and D.

Purpose A – to check the unrestricted sprawl of large built-up areas

B.36 Green Belt land contributing **strongly** to Purpose A is likely to:

- be adjacent or near to a large built-up area;
- be free of existing development;
- lack physical features in reasonable proximity that could restrict and contain development; and,
- if developed, would result in an incongruous pattern of development (such as an extended ‘finger’ of development into the Green Belt).

B.37 Green Belt land contributing **moderately** to Purpose A is likely to be adjacent or near to a large built-up area, and include one or more features that weaken contribution, such as (but not limited to):

- having physical feature(s) in reasonable proximity that could restrict and contain development; and/or
- contain or be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development; and/or
- being subject to other urbanising influences.

B.38 Green Belt land contributing **weakly** to Purpose A is likely to be:

- not adjacent to or near to a large built up area; or,
- adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development.

Purpose B – to prevent neighbouring towns merging into one another

B.39 Green Belt land contributing **strongly** to Purpose B is likely to:

- be free of existing development;
- be a substantial part of a gap between towns; and
- if developed, would likely result in the loss of visual separation of towns.

B.40 Green Belt land contributing **moderately** to Purpose B is likely to be located in a gap between towns, and include one or more features that weaken contribution, such as (but not limited to):

- a small part of a gap between towns; or
- if developed, would not result in the loss of visual separation between towns, for example due to the close proximity of structures, natural landscape elements or topography that preserve visual separation.

B.41 Green Belt land contributing **weakly** to Purpose B is likely to:

- not form part of a gap between towns; or,
- form only a very small part of a gap between towns, without making a contribution to visual separation.

Purpose D – to preserve the setting and special character of historic towns

B.42 Green Belt land contributing **strongly** to Purpose D is likely to:

- be free of existing development;
- form part of the setting of a historic town; and
- make a considerable contribution to the special character of a historic town, for example, as a result of being within, adjacent to, or of significant visual importance to the historic aspects of a town.

B.43 Green Belt land contributing **moderately** to Purpose D is likely to form part of the setting and/or contribute to the special character of a historic town, and include one or more features that weaken their contribution, such as (but not limited to):

- being separated to some extent from historic aspects of the town by existing development or topography;

- containing existing development; or
- not having an important visual, physical, or experiential relationship to historic aspects of a town.

B.44 Green Belt land contributing **weakly** to Purpose D is likely to not form part of the setting of a historic town, with no visual, physical, or experiential connection to the historic aspects of a town.

Applying NPPF footnote 7 to the definition of Grey Belt land

B.45 Grey belt land cannot be defined on Green Belt land covered by or affecting other NPPF footnote designations where that designation 'would provide a strong reason for refusing and restricting development'. In such locations, it may be necessary to only 'provisionally identify such land as grey belt in advance of more detailed specific proposals' (PPG Paragraph: 006 Reference ID: 64-006-20250225).

Assessing the impact of Green Belt release or development on the remaining Green Belt in the Plan area

B.46 The PPG states that a Green Belt assessment should not be limited to the impact of release or development of grey belt land but any Green Belt land, and requires consideration of fundamental impact to all five Green Belt purposes (taken together) to all remaining Green Belt across the plan area as a whole.

B.47 Such Green Belt locations should only be discounted for release or development where they would 'affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way' (PPG Paragraph: 008 Reference ID: 64-008-20250225).

Identifying sustainable locations in a Green Belt

B.48 Whether reviewing Green Belt boundaries or determining applications for development in the Green Belt, the need to promote sustainable patterns of development should determine whether a site's location would be appropriate for the kind of development proposed. Consequently, where grey belt land is not in a location that is or can be made sustainable, development on this land is inappropriate.

B.49 The sustainability of specific locations should be determined in light of local context and site or development-specific considerations; however, authorities should

seek to maximise sustainable transport solutions in line with NPPF paragraphs 110 and 115.

Golden Rules for Green Belt development

B.50 Green Belt developments must contribute to accessible green spaces to meet the Golden Rules. The PPG defines 'accessible green spaces' as 'areas of vegetation set within a landscape or townscape, often including blue space, which are available for public use free of charge and with limited time restrictions' (PPG Paragraph: 012 Reference ID: 64-012-20250225).

B.51 The PPG requires, contributions to accessible green space to consider delivering:

- Good quality green spaces which are safe; visually stimulating and attractive; well-designed; sustainably managed and maintained; and seek to meet the needs of the communities which they serve.
- Include safe active travel routes and infrastructure (such as footpaths and bridleways).
- Nature recovery set out within the relevant Local Nature Recovery Strategies, providing greater benefit to nature and contributing to the delivery of wider environmental outcomes.
- Arrangements for the long-term maintenance of green spaces.

B.52 Further guidance on Golden Rules for Green Belt development is set out in viability guidance, which states site specific viability assessment should not be undertaken or taken into account for the purpose of reducing developer contributions, including affordable housing. The government intends to review this Viability Guidance and will be considering whether there are circumstances in which site-specific viability assessment may be taken into account, for example, on large sites and Previously Developed Land (PDL).

B.53 Prior to development plan policies for affordable housing being updated in accordance with paragraph 67 in the National Planning Policy Framework, the amount of affordable housing contributions required are subject to an overall cap of 50% or more.

Impact of development on the openness of the Green Belt

B.54 Where necessary, assessments of the impact of proposals on the openness of the Green Belt must be tailored to the circumstances of the case and may include consideration of a proposals:

- spatial volume, i.e. impact on spatial openness;
- visual impact, i.e. impact on visual openness;
- the duration of development, and its remendability; and,
- the degree of activity, such as traffic generation.

Harm of not inappropriate development to the Green Belt and its openness

B.55 If development is on previously developed land (PDL) or grey belt and is not inappropriate development, substantial weight does not need to be given to any harm to the Green Belt, including to its openness **[See reference 15]**. This is justified by the definition of the land as PDL or grey belt, having already considered its impacts on openness or to Green Belt purposes.

London Green Belt policy

B.56 The role of the Green Belt is also reflected in the London Plan (2021) **[See reference 16]**. Policy G2: London's Green Belt states:

'The Green Belt should be protected from inappropriate development:

1. Development proposals that would harm the Green Belt should be refused except where very special circumstances exist.
2. Subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multifunctional beneficial uses for Londoners should be supported.

Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan.'

B.57 The London Plan is currently being reviewed, with a draft Replacement Plan anticipated in 2026. This assessment will form part of the evidence base for that new Plan.

London Green Belt evidence

B.58 The PPG outlined above makes it clear that the Government expects 'most Green Belt assessments to be undertaken by local authorities or appropriate groups of local authorities', and 'when updating or preparing plans, authorities will need to consider whether any existing Green Belt assessment remains up to date.' Therefore, although many local authorities may already have broadly appropriate Green Belt assessments, all are in the process of being reviewed and updated to be in line with the new PPG where necessary.

B.59 London is the only part of the country with an Strategic Development Strategy (The London Plan) in place, which sets the London borough's housing targets. The London-wide Green Belt assessment is required to inform the next London Plan, including future London borough housing targets.

B.60 This section references the latest Green Belt assessments prepared by Greater London's 18 local authorities, all of which are considered to require updating in line with current Government policy and the PPG. This study represents the first step in this process for the GLA and the commissioning London boroughs, and is likely to be a helpful consideration for the remaining London boroughs preparing their own updated Green Belt evidence. The last Green Belt assessment prepared by each London borough with Green Belt land is referenced below:

- Barking and Dagenham: The borough's latest Green Belt assessment was prepared in 2023 to inform its recently adopted (2024) Local Plan **[See reference 17]**.
- Barnet: The borough's latest Green Belt assessment was prepared in 2018 to inform its recently adopted (2025) Local Plan **[See reference 18]**.
- Bexley: The Council's published Local Plan (adopted 2023) evidence base does not currently contain a relevant Green Belt assessment study. The Council are in the process of preparing a Borough-wide Green Belt study in line with recent changes to the NPPF and PPG.
- Bromley: The Council's published Local Plan (adopted 2019) evidence base does not currently contain a relevant Green Belt assessment study. The Council are in the process of preparing a Borough-wide Green Belt study in line with recent changes to the NPPF and PPG.
- Croydon: The borough's latest Green Belt assessment was prepared in 2019 to inform the review of its adopted (2018) Local Plan **[See reference 19]**.

- Ealing: The borough's latest Green Belt assessments were prepared in 2022 and 2024 to inform its emerging Local Plan (submitted for examination in 2024) **[See reference 20]**.
- Enfield: The borough's latest Green Belt assessment was prepared from 2021 to 2023 to inform its emerging Local Plan (submitted for examination in 2024) **[See reference 21]**.
- Haringey: The borough's latest Green Belt assessment was prepared in 2014 to inform its emerging Local Plan **[See reference 22]**.
- Harrow: The borough's latest Green Belt assessment was prepared in 2004 to inform its adopted (2012) Local Plan **[See reference 23]**.
- Havering: The borough's latest Green Belt assessment was prepared in 2016 and 2018 to inform its adopted (2021) Local Plan **[See reference 24]**. The Council are in the process of preparing a Borough-wide Green Belt study in line with recent changes to the NPPF and PPG.
- Hillingdon: The borough's latest Green Belt assessment was prepared in 2013 to inform its adopted Local Plan (adopted in two parts in 2013 and 2020) **[See reference 25]**. The Council are in the process of preparing a Borough-wide Green Belt study in line with recent changes to the NPPF and PPG.
- Hounslow: The borough's latest Green Belt assessments were prepared in 2015 and 2019 to inform its emerging Local Plan submitted for public examination by the Planning Inspectorate under transitionary arrangements, i.e. the emerging Local Plan is being assessed based on NPPF (2023). **[See reference 26]**.
- Kingston Upon Thames: The borough's latest Green Belt assessment was prepared in 2018 to inform its emerging Local Plan **[See reference 27]**. The Council are in the process of preparing a Borough-wide Green Belt study in line with recent changes to the NPPF and PPG.
- Newham: The borough's latest Green Belt assessment was prepared in 2024 to inform its emerging Local Plan Review **[See reference 28]**.
- Redbridge: The borough's latest Green Belt assessment was prepared in 2016 to inform its adopted (2018) Local Plan **[See reference 29]**.
- Richmond: The borough's latest Green Belt assessment was prepared in 2021 to inform its adopted Local Plan **[See reference 30]**.
- Sutton: The borough's latest Green Belt assessment was prepared in 2023 to inform its emerging Local Plan **[See reference 31]**.

- Waltham Forest: The borough's latest Green Belt assessment was prepared in 2015 and 2019 to inform its adopted (2024) Local Plan **[See reference 32]**.

Appendix C
Consultation Summary

C.1 Chapter 1 sets out the approach to engagement with local planning authorities, statutory consultees and other stakeholders.

Method statement consultation

C.2 Table C.1 summarises the consultation comments received and responses and amendments to the method statement at this stage.

Table C.1: Method statement consultation record

Comments	Responses / Actions
Stakeholders expressed concern that introducing a "very strong" contribution rating, beyond the three-tier scale outlined in the Planning Practice Guidance (PPG), could cause confusion or devalue the "strong" rating, potentially impacting development decisions. They sought clarification on its benefits and implications.	The "very strong" rating is designed to provide greater granularity for commissioning authorities, highlighting areas of highest contribution within the "strong" category, but it does not undermine the value or policy status of "strong" contributions. All areas rated "strong" or "very strong" are considered equal in the context of the PPG and are identified as Green Belt, not grey belt. The London-wide report will not differentiate "very strong" contributions, and commissioning boroughs will have the option to include this distinction in their individual reports.
Clarification is sought on how "towns" are defined within the Greater London conurbation for Purpose B, and sought amendments to include or clarify specific settlements in Appendix A lists. Concerns were raised about the	For Green Belt land in the Greater London conurbation, where no distinct towns are separated by Green Belt, the urban edge of the conurbation is considered to represent the urban edge of the nearest towns. Appendix A has been updated to reflect specific feedback on relevant towns and urban

Comments	Responses / Actions
consistency of approach with existing local Green Belt assessments.	areas. This approach is consistent with existing Green Belt studies conducted for individual boroughs.
Stakeholders emphasised the critical role of conservation professionals' input for assessing impacts on designated heritage assets, non-designated archaeology of national significance, and their settings. There was concern that the strategic scale of assessment might not adequately capture these nuances and that "provisional grey belt" status for areas overlapping with Footnote 7 designations required careful qualification. The importance of Listed Buildings and their settings was specifically highlighted.	All available historic environment datasets, including the London Historic Characterisation Project, will inform assessments. We confirm that Green Belt land overlapping with Footnote 7 areas and assets will only be 'provisionally' identified as grey belt, explicitly signalling the need for further detailed, site-specific work by local planning authorities through plan-making or development management processes. To aid this, point data for listed buildings is mapped. The final report will clarify that such provisional areas require robust local testing.
More detail on the rationale for the 5-hectare minimum parcel size is required and how smaller areas or more detailed assessments would be handled, particularly for local plan-making and development management decisions.	The 5-hectare minimum parcel size is designed to define strategic variations in contribution to the Green Belt purposes across Greater London. In rare cases where smaller parcels (under 5ha) are isolated by urban or borough boundaries, they will be assessed. The study provides a baseline, and individual boroughs may wish to undertake more detailed, finer-grain assessments as needed for specific site proposals in their local plan-making or development management processes.
Stakeholders sought clarification on the relationship between Green Belt and Metropolitan Open Land (MOL), including why MOL is excluded from the study and the potential for Green Belt land to be re-designated as MOL. They	Text has been added to the final report to clarify that MOL is a distinct designation with different purposes to Green Belt and is therefore outside the scope of this assessment. While re-designation of land (e.g., from Green

Comments	Responses / Actions
highlighted local areas of open space that, while not Green Belt, are important.	Belt to MOL) may be a desirable outcome for local plans, this strategic study does not propose such changes. Figure A1 shows MOL for context.
General support was expressed for the methodology's approach to assessing the Green Belt purposes. Some minor points were raised regarding the importance of morphology/topography for Purpose A and C, and the handling of PDL.	The role of morphology and topography is acknowledged as a key consideration in the assessment of Green Belt contributions. The definition of Previously Developed Land (PDL) and its relation to grey belt has been clarified to ensure consistency with national policy, recognising its utility in subsequent site selection processes. The study does not define PDL in each London borough.

Pilot assessment report consultation

C.3 Table C.2 summarises the consultation comments received and responses and amendments to pilot assessment report.

Table C.2: Pilot assessment consultation record

Comments	Responses / Actions
Stakeholders suggested the reports provide greater clarity on the status of parcels shown as Grey Belt. Appropriate terms are needed to avoid misinterpretation, such as 'potential' or 'possible' Grey Belt. It should be noted that detailed assessment at the borough level is required to consider whether Grey Belt definition is appropriate.	The word ‘potential’ was added, and an additional sentence referring to borough work to formally define grey belt land added.
As MOL is outside the scope of this study the reports should note that	Text has been added to the final report to clarify that MOL is a distinct

Comments	Responses / Actions
although parcels do not perform against the Green Belt Purposes they may be suitable for other designations that form part of the open space hierarchy.	designation with different purposes to Green Belt and is therefore outside the scope of this assessment.
Additional detail in the commentary to refer to parcels and how the judgements have been made is required. Additionally, labelling of maps should be more detailed and removing the Green Belt layer from the aerial photography can also make them clearer.	Additional parcel references and additional labelling will be included in the final output. The level of detail in the commentary is considered appropriate for a strategic study.

Commissioning borough draft assessment findings consultation

C.4 Table C.3 summarises the consultation comments received and responses and amendments to the commissioning borough draft assessment findings.

Table C.3: Commissioning borough draft assessment findings consultation record

Comments	Responses / Actions
Stakeholders suggested that land identified as 'potential Grey Belt' should not be, given its existing or proposed designation as Metropolitan Open Land (MOL) or Local Open Space (LOS) in their Local Plans, or its suitability for such. They suggest these local policy designations should be reflected as a strong reason against Grey Belt status.	The Green Belt assessment is distinct from local designations like MOL or LOS, as they operate under different policy frameworks (NPPF vs. London Plan). All existing Green Belt land in Greater London has been assessed in this study. Boroughs may wish to consider building the necessary exceptional circumstances cases for is redesignation through their respective Local Plan-making processes.

Comments	Responses / Actions
Some boroughs challenged some of the parcel definitions, arguing that smaller subdivisions undervalue Green Belt contributions and that larger, more cohesive boundaries, or existing local designations, should be considered. They suggest that smaller parcels hinder a strategic understanding of the Green Belt's role.	Parcels reflect variations in Green Belt contribution, aligning with PPG guidance for identifying 'grey belt' that ‘a small number of large assessment areas will not be appropriate in most circumstances – authorities should consider whether there are opportunities to better identify areas of grey belt by subdividing areas into smaller assessment areas where this is necessary.’.
There were some questions regarding the assessment of 'urbanising influence' or 'openness' within parcels, with some arguing that minimal or screened development, or specific views across the land, warrant stronger Green Belt contribution ratings. Conversely, some suggest greater urbanising influence.	The assessments use a range of factors in defining perceptions of urbanisation, including views through seasonal foliage, alongside other factors influencing contribution. Minor clarifications have been made, but the overall assessment of openness and urbanising influence remains consistent with the methodology.
Concerns were raised about the fundamental suitability of some parcels for definition as potential grey belt, with boroughs asserting that their Green Belt contributions (especially to Purposes A, B, or D) are stronger than assessed. There are also requests for clarification on the precise criteria for Grey Belt.	Green Belt land with potential for definition as grey belt land has been defined based solely the NPPF definition (Green Belt land not strongly contributing to purposes A, B, or D). Potential 'Grey Belt' status indicates areas for further detailed local assessment.
Boroughs queried how specific land uses, such as sports pitches, allotments, cemeteries, or recreational grounds, were evaluated against Green Belt purposes, contending that these uses maintain openness and should not be considered 'urbanising' in a way that diminishes Green Belt value.	These uses are generally classified as associated with an urban area where in close proximity to urban edges, which may limit a parcel's perception as unspoilt countryside (Purpose C), or contribute to "some urbanising activity" (Purposes A/B). However, as generally appropriate land uses in the Green Belt,

Comments	Responses / Actions
	they do not judged to affect the openness of the Green Belt and/or represent significant development .
Councils sought clear clarification that the identification of 'potential Grey Belt' land is a preliminary finding, not a definitive recommendation for release or development. They emphasise that it requires substantial further local assessment, including detailed consideration of NPPF Footnote 7 assets and alignment with existing/emerging Local Plans.	Provisional Grey Belt status indicates areas that do not strongly contribute to key Green Belt purposes (A, B, D) and are *potentially* suitable for local review. It explicitly requires boroughs to conduct "further detailed work" and consider "wider planning considerations, including effects on other environmental designations not referenced under NPPF footnote 7," before making any policy decisions.

References

1 The London Borough of Redbridge decided to withdraw from the study during the assessment phase.

2 NPPF definition of 'Habitat Site': Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

3 NPPF definition of 'Heritage Asset': A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

4 Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

5 Some Irreplaceable Habitat data sets are more up-to-date than others. Consequently, their extent mapped in this study may require refinement following detailed site specific work through the typical development management process.

6 Robin Buchanan, January 2025 with regards to Suite 1, The Stables, Cannons Mill Lane, Bishop's Stortford CM23 2BN (Appeal Ref: APP/J1915/W/24/3339916)

7 R (on the application of Lee Valley Regional Park Authority) v Broxbourne BC [2015] EWHC 185 (Admin); R (on the application of Ribble Valley Borough Council) v (1) Secretary of State for Housing, Communities and Local Government (2) Majid Hussain [2025] EWHC 2363 (Admin).

8 The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.

9 House of Commons Library, City & Town Classification of Constituencies & Local Authorities (June, 2018). Available at: https://commonslibrary.parliament.uk/research-briefings/cbp-8322/

10 The Court of Appeal decision in R (Lee Valley Regional Park Authority) v Epping Forest DC [2016] EWCA Civ 404 included reference to openness in relation to appropriate development, with the judgement that appropriate development cannot be considered to have an urbanising influence and therefore harm Green Belt purposes.

11 Hansard HC Deb 08 November 1988 vol 140 c148W 148W; referenced in Historic England (2018) response to the Welwyn Hatfield Local Plan – Green Belt Review – Stage 3.

12 Planning Inspectorate, David Smith, Report to the Council of the London Borough of Redbridge regarding the Examination of the Redbridge Local Plan 2015-2030 (January, 2018). Available at: https://www.redbridge.gov.uk/media/4732/redbridge-local-plan-inspectors-report.pdf

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