

London Borough of Lewisham
Lewisham Metropolitan Open Land Review
Main Report
Final – 5 March 2020

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

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

Job number 271571

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Contents

	Page
1 Introduction	2
1.1 Study Purposes	2
1.2 Structure	3
2 Context	4
2.1 MOL Policy and Guidance	4
2.2 Green Belt	6
2.3 Experience Elsewhere	9
2.4 Legal Precedents	13
2.5 Implications for this Study	14
3 Methodology	16
3.1 Assessment	16
3.2 Step 1: Area Identification	17
3.3 Step 2: Defining Sub-Area Boundaries	17
3.4 Step 3: Site Visits	17
3.5 Step 4: Assessment of Sub-Areas	20
3.6 Step 4b: Consideration of Boundaries	25
3.7 Step 5: Categorisation and Recommendations	25
4 MOL Key Findings and Recommendations	26
5 Conclusions	30
5.1 Performance Assessment	30
5.2 Potential Amendments to MOL	30

Appendix A

Glossary of Terms

A1 Glossary of Terms and Acronyms

1 Introduction

1.1 Study Purposes

Arup was appointed by London Borough of Lewisham (LBL) to undertake a review of its Metropolitan Open Land (MOL) to support the preparation of Lewisham's new Local Plan.

Overarching MOL policy is established through the London Plan, which requires boroughs to designate the extent of MOL in their Local Plans with any changes to the existing boundaries to be undertaken through the plan-land process. The London Plan further states MOL and Green Belt should be accorded equal status and that the principles of national Green Belt policy should apply to MOL.

The purpose of this MOL Review is to provide evidence regarding the strategic performance of MOL, assessed against the MOL designation criteria, as set out in the London Plan. LBL may then take the findings of the review into account alongside other evidence in making decisions about their Local Plan Strategy and site allocations and ultimately possible alterations to MOL boundaries.

The review is not a policy or decision-making document that proposes any release or amendments of MOL but it will be an important part of LBL's evidence base. It is not within the remit of the MOL review to consider exceptional circumstances arguments, which the London Plan requires as necessary to justify the release of land from MOL. It will fall to LBL to further assess this, as appropriate, as part of the wider plan-making process.

MOL will not be the only consideration when assessing the suitability and deliverability of sites identified for allocation in Lewisham. LBL will not be precluded from allocating MOL sites for development if other factors in favour of the site outweigh this consideration. There is no clear definition of what amounts to exceptional circumstances to justify alterations of the MOL boundary to support proposed site allocations. However, case law and Local Plan Examination in Public (EIP) precedents¹ in relation to MOL and Green

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

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

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

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

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

Belt suggest that any justification must be responsive to local conditions and take into account a range of factors. Such factors might include:

- Unique / significant housing or employment need and a lack of supply of more preferential sites (i.e. those that the National Planning Policy Framework (NPPF) directs towards before considering MOL / Green Belt²) - exceptional circumstances cannot be justified based on need alone³;
- Adverse implications for the sustainable development strategy within the borough;
- Inherent sustainability of directing growth in a particular direction;
- Tightly drawn MOL / Green Belt boundaries and constraints on alternative sites;
- The opportunity to deliver social infrastructure, which would bring about long-term benefits for local residents; or
- Boosting housing delivery in areas with past issues of deliverability in order to increase the supply of affordable housing.

1.2 Structure

The paper is structured as follows:

- Section 2 considers the context for undertaking a MOL review based on a review of planning policy, guidance, experience elsewhere and legal precedents.
- Section 3 sets out the methodology.
- Section 4 presents the key findings and recommendations from the MOL assessment.
- Section 5 provides the conclusions of the study.

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

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

Bromsgrove (2016)

² See: National Planning Policy Framework (2019) paragraph 133.

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

2 Context

This section establishes the context for the MOL review. It explores planning policy relating to MOL and Green Belt, as well as reviewing experience elsewhere in terms of other MOL reviews and legal precedents to set out key implications for this review.

2.1 MOL Policy and Guidance

The concept of MOL was first defined in the 1969 draft London Development Plan, which proposed a protective designation for larger areas of open land within the urban area. Upon approval of the Plan in 1976, the policy was adopted as ‘land within the built-up area’ that needs ‘to be safeguarded just as much as the Green Belt’. Since the concept was first introduced, it has remained the province of London’s metropolitan planning policy only. Thus the 2019 National Planning Policy Framework (NPPF) (and its predecessors) contains no references to MOL. There is no guidance available on conducting a MOL review.

2.1.1 London Plan

Adopted London Plan

Policy 7.17 of the London Plan (2016)⁴ establishes the policy context for MOL. At the strategic level, support is expressed for the current extent of MOL, its extension in appropriate circumstances and protection against development, in particular, that which would have an adverse impact on its openness. The policy states that any alterations to MOL boundaries should be undertaken as part of the LDF process; and further that to designate land as MOL it is necessary to demonstrate that the land meets at least one of the following criteria:

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

⁴ Mayor of London (2016) The London Plan, The Spatial Development Strategy for London Consolidated with Alterations Since 2011

The supporting text to Policy 7.17 states that ‘paragraphs 79-92 of the [2012] NPPF on Green Belts applies equally to Metropolitan Open Land (MOL)’.⁵ This was tested in the appeal case of R (on the application of Lensbury Ltd) v Richmond-Upon-Thames London Borough Council⁶, which confirmed in legal terms that equal protection should be afforded to Green Belt and MOL designations in determining planning applications.

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

Draft London Plan

Following the EIP in 2018, the Mayor released the replacement draft London Plan with post EIP amendments. Although the 2016 London Plan remains adopted policy, the 2019 draft London Plan will be accorded increasing weight in planning decisions given its likely imminent adoption. It should be noted that the draft London Plan has been examined against the 2012 NPPF and therefore does not take into account any changes made in the 2018/2019 versions of the NPPF. The Secretary of State for Housing, Communities and Local Government has stated that a revised London Plan must be brought forward at the earliest opportunity, which has regard to the new national policy. Given that the NPPF is ‘silent’ on the issue of MOL, this direction is more significant in terms of any impact for Green Belt policy. However, it is important to consider given the close intertwining of these two policy strands in the London Plan.

The draft London Plan⁷ (2019) includes Policy G3 on MOL. The requirements of Policy G3 (Part A) are similar to the adopted London Plan, i.e. the need to protect MOL from inappropriate development and encouraging the enhancement of quality and range of uses for MOL. Although it now states that ‘*development proposals that would harm MOL should be refused.*’ The policy also now explicitly states that MOL is ‘*afforded the same status and level of protection as Green Belt.*’

The criteria for designating MOL remain broadly unchanged (Policy G3, Part B), although the numbering has been revised to 1-4 and the wording of the final criteria refined:

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

The policy continues to require that any alterations to the boundary of MOL be undertaken through the Local Plan process (Policy G3, Part C). However, the

⁵ It is assumed that the paragraphs in the new NPPF (2019) relating to Green Belt, paras 133-147, continue to apply to MOL. Further detail on these paragraphs is set out in section 2.2.1 of this review.

⁶ R, Lensbury Ltd (2016), (On the application of) v Richmond-Upon-Thames London Borough Council.

⁷ GLA (2019) Draft London Plan – Consolidate Changes Version

policy now explicitly states that boundary alterations should only take place in exceptional circumstances, which must be fully evidenced and justified.

The EIP Panel Report and Recommendations, subsequently published in October 2019, proposes changes to the draft MOL policy flagging Parts A and C as inconsistent with national policy. No changes are recommended for the designation criteria (Policy G3, Part B). The Panel Recommendations delete the references to causing harm, citing the NPPF allowance for very special circumstances.

2.1.2 Local Policy

Lewisham's policy on MOL is set out in the Core Strategy's Development Plan Document (2011). Core Strategy Objective 7 states that the 'important environmental, ecological and biodiversity features' of the borough, including MOL, should be protected to promote health and well-being. This is objective supported in policies throughout the document, such as Spatial Policy 1, which states that open space, including MOL, 'will be protected, and a net gain of open space across the borough will be sought, particularly through on-site provision'.

Core Strategy Policy 12 recognises the role that the natural environment plays in addressing climate change. It sets the requirement for the council to conserve nature, green the built environment and facilitate sport and recreation. One of the listed actions for achieving this includes designating additional MOL including Sydenham Wells Park, Horniman Gardens and Telegraph Hill Park.

Core Strategy Policy 18 further states that tall buildings will be 'considered inappropriate' in areas where their presence would harm local character and areas of open space, such as MOL.

2.2 Green Belt

Given that MOL and Green Belt are afforded the same status and protection and the fact that NPPF Green Belt policy is considered to apply to MOL, it is equally important to understand the Green Belt policy context.

2.2.1 National Policy and Guidance

NPPF

National Green Belt policy as set out in the 2019 NPPF places 'great importance' on the Green Belt, and seeks its protection through preventing urban sprawl and keeping land permanently open. The NPPF defines Green Belt's essential characteristics as its 'openness and permanence'.

Green Belt is considered to have five key purposes, these are:

1. To prevent unrestricted sprawl of large urban areas;
2. To prevent neighbouring towns merging into one another;

3. To contribute to the safeguarding the countryside against encroachment;
4. To preserve the special character and setting of historic towns; and
5. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Once established, Green Belt boundaries can only be altered in exceptional circumstances, which must be fully justified and evidenced in updated plans. This will be assessed at an examination considering whether:

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

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

Planning Practice Guidance

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

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

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

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

2.2.2 London Plan

Adopted London Plan (2016)

Policy 7.16 of the London Plan (2016)⁸ establishes the policy context for London's Green Belt. At the strategic level, support is expressed for the current extent of London's Green Belt, its extension in appropriate circumstances and its protection against development. The policy states that the strongest protection should be given to London's Green Belt, in accordance to national guidance. In regard to planning decisions, inappropriate development should be refused, except in very special circumstances. Development will only be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance.

The supporting text to Policy 7.16 states that 'paragraphs 79-92 of the [2012] NPPF gives clear policy guidance on the functions of the Green Belt performs, its key characteristics, acceptable uses and how its boundaries should be altered, if necessary. The supporting text states the important role the Green Belt plays as part of London's multifunctional green infrastructure and how the Mayor is keen to see improvements in its overall quality and accessibility. Positive management of the Green Belt is key to improving its quality and hence its positive benefits for Londoners.

Draft London Plan (2019)

As discussed previously, following the EIP in 2018, the Mayor released the replacement draft London Plan with post EIP amendments. Although the 2016 London Plan remains adopted policy, the 2019 draft London Plan will be accorded increasing weight in planning decisions given its likely imminent adoption. The Draft Local Plan includes Policy G2 London's Green Belt. The policy states the Mayor's strong support for the continued protection of London's Green Belt. Policy G2 sets out the following:

'A The Green Belt should be protected from inappropriate development:

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

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

The Draft London Plan (2019) refers to the NPPF and the clear direction for management of development within the Green Belt and the processes and considerations for defining Green Belt boundaries that it provides. The policy sets out the multi-functional benefits of the Green Belt for London, such as combating the urban heat island effect, growing food, and providing space for

⁸ Mayor of London (2016) The London Plan, The Spatial Development Strategy for London Consolidated with Alterations Since 2011

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

The EIP Panel Report and Recommendations, subsequently published in October 2019, proposes changes to the draft Green Belt policy flagging it as inconsistent with national policy. A modified Policy G2 is recommended:

‘A The Green Belt should be protected from inappropriate development:

- 1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist;*
- 2) subject to national planning policy tests the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.*

B Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a local plan’.

2.2.3 Local Plan

The London Borough of Lewisham’s Core Strategy (2011)⁹ has no specific policy on Green Belt given there is no designation in the borough.

2.3 Experience Elsewhere

Table 2.1 provides a summary of MOL reviews carried out by local authorities across London, including those authorities neighbouring Lewisham. The summary includes high level details of the methodology employed along with key findings.

It should be noted that the timescales for undertaking all but one of these MOL reviews pre-date the publication of the 2019 NPPF (exception being LB Hounslow, published in June 2019), and all reviews predate the Draft London Plan, whilst others have not been subject to Independent Examination. In identifying good practice from the approaches adopted by other authorities, these factors should be taken into account to ensure that the methodology adopted is sound and reflects the latest policy requirements.

⁹ The London Borough of Lewisham (2011) Local Development Framework Core Strategy
<https://lewisham.gov.uk/myservices/planning/policy/ldf/core-strategy/about-our-core-strategy-for-the-local-development-framework>

Table 2.1 MOL Reviews Experience Elsewhere

Local Authority	Study	Status	Summary of Approach
LB Barnet	Green Belt and Metropolitan Open Land Study	In progress	n/a
LB Croydon	Review of Metropolitan Green Belt and Metropolitan Open Land	Published 2016; Review in progress	A joint review of all Green Belt and MOL in the borough. The first part of the assessment reviews all designated sites against the MOL criteria set out in the London Plan, and a further section explores potential development options for any poorly performing sites. The review found one area of land that did not meet the requirements for MOL. A further three areas of Local Open Land abutting the Green Belt were proposed to be re-designated as MOL.
LB Enfield	Metropolitan Open Land & Green Chain Associated Open Space Review	Published 2013	A high-level review of MOL and Green Chain associated Open Space (GCOS). It reviewed the MOL boundaries, using GIS to 'tidy up' boundaries that needed adjustment due to land use changes since the previous iteration or past cartographical inconsistencies (due to the previous study being carried out before the invention of GIS). It was recommended that the borders of sixteen MOL sites should be amended for this reason. Two GCOS sites were recommended to be designated to MOL with a further seven GCOS sites were recommended to be designated to MOL with additional boundary changes. One Local Open Space site was recommended to be designated to MOL.
LB Hillingdon	Metropolitan Open Land and Green Chains Assessment	Published 2004	The study assessed 3 MOL sites and 6 Green Chain sites against criteria developed by the study using national and regional policies. This was supported by a process of option development, with particular attention paid to the relationship between MOL and Green Chains and the large areas of designated Green Belt in the borough. The study recommended retaining two existing MOL sites, re-designating two existing MOL sites as Green Belt, and designating seven of 'Areas forming links in Green Chains' to MOL.

Local Authority	Study	Status	Summary of Approach
LB Hounslow	Hounslow Green Belt Review Stage 2	Published 2019 [Produced by Arup]	The study was a stage 2 Green Belt and MOL review, which aimed to assess the findings of the Stage 1 Green Belt review undertaken in 2015 to ensure compliance with the updated NPPF and further developing a draft Stage 2 Green Belt Review undertaken by the local authority in 2017. The Green Belt and MOL assessments followed two separate but complementary workstreams. A key focus of the MOL assessment was to establish whether Green Belt General Areas that perform poorly against the NPPF but provide important open space, could be re-designated as MOL. The areas identified for assessment were evaluated against the London Plan MOL criteria and an overall score was developed for each parcel. This was used to support the recommendations made for each site. The study recommended that three General Areas should be re-designated as MOL and six should be partially re-designated as MOL.
LB Richmond upon Thames	Review of Land Subject to Protective MOL and OOLTI designation	Published 2006	This study reviewed MOL, Green Belt, Green Chains and Other Open Land of Townscape Importance (OOLTI) in the borough. The study noted that the local authority was not open to removing designations from existing sites, but instead wanted to focus on increasing the number of designated sites in the borough. The first phase of the study involved reviewing existing designated sites and potential new sites using aerial photography. This process identified 88 new sites that may be suitable for designation, and these were taken forward for further assessment and a site visit. Sites were assessed against the criteria set out in the UDP policies. The MOL policy criteria are akin to the current London Plan MOL designation criteria in terms of their intent and scope. It was concluded that 38 of these sites were recommended as 'Highly Recommended' for designation, while 50 were recommended as 'Possible Designation'.
LB Sutton	Green Belt and Metropolitan Open Land Review	Published 2015	The study was prepared in support of an emerging Local Plan and aimed to assess whether Green Belt and MOL were performing adequately. The review included Stage 1 and Stage 2 assessments for Green Belt and MOL. The Stage 1 review assessed the Green Belt and MOL against criteria derived from the NPPF and London Plan respectively. The Stage 1 Review concluded that of the 30 MOL sites reviewed, 7 MOL sites were identified as poorly performing and suitable for 'Possible Release'. Poorly performing sites were then examined in further detail in Stage 2 of the assessment against criteria used elsewhere in the Local Plan preparation work to evaluate potential development sites through the call for sites process. the assessment found that 6 of the 7 poorly performing MOL sites were suitable for potential release, representing a loss of 13.13ha.

Local Authority	Study	Status	Summary of Approach
RB Greenwich	Towards a Greener Royal Greenwich – Green Infrastructure Study	Published 2017	A MOL review was undertaken as part of the borough's Green Infrastructure Study. The study aimed to audit existing provision of all types of green infrastructure and designated open space and inform decisions regarding allocating land for other forms of development. A desk-based study was used to audit each MOL site against the London Plan MOL criteria using OS maps and aerial photographs, and these were verified through a series of site visits. The review found that of the 1177.8ha of land currently designated as MOL within the borough, 1.8ha could be considered for exclusion. A further 10.9ha could be considered as meeting the criteria for MOL and should be considered for inclusion. The review included five suggested amendments to extend areas of MOL to include adjoining areas of open space. Two sites were recommended for exclusion as they were considered not consistent with MOL criteria.
RB Kingston Upon Thames	Green Belt and Metropolitan Open Land Assessment	Published 2018	This review was conducted in support of the development of a new Local Plan and covered all MOL and Green Belt across the borough. The study used both a desk-based and site-based assessment and compared each MOL site against the London Plan MOL criteria. It was found that significant areas of MOL that are identified as being significant to London as a whole, such as those that provide context to the River Thames Strategic River Corridor. The assessment found that there were no MOL sites that made an overall limited contribution to the MOL criteria. Two additional sites were identified as being suitable for consideration for designation as MOL.

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

In summary, the following key points can be noted:

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

2.4 Legal Precedents

This section provides a summary of relevant recent legal precedents, established through Planning Appeals and Independent Examination of Local Plans, which will help to inform the approach taken to the MOL review. It should be noted, however, that all of these precedents were made within the context of the 2012 NPPF and / or the 2016 London Plan. It will remain to be seen whether any of these precedents will be challenged as the 2019 NPPF, or the replacement London Plan, is applied to planning decisions and plan making.

MOL Precedents

A review of MOL appeals found that the case law reflects the London Plan's assertion that MOL should be afforded the same level of protection as Green Belt. Key tests in Green Belt policy, such as the appropriateness of development or the 'special circumstances' in which development harmful to the Green Belt can be approved, have successfully been applied in cases concerning MOL.^{10, 11}

Green Belt Precedents

Various planning appeals¹² have highlighted important considerations around the interpretation and importance of 'openness of the Green Belt' and therefore how this is applied in a Green Belt assessment or a MOL review. Openness is generally considered to be 'land free from built development', which should be assessed on an individual area / site basis as well as in terms of the

¹⁰ The Queen on the application of Heath & Hampstead Society and Alex & Thalys Vlachos and London Borough of Camden [2008] EWCA Civ 193.

¹¹ Brown v London Borough of Ealing Council & Anor [2018] EWCA Civ 556 (23 March 2018)

¹² For example: Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin); The Planning Inspectorate (2018) *Appeal Ref: APP / P1940/W/17/3183388* – Clovercourt Ltd v Three Rivers District Council; The Planning Inspectorate (2018) *Appeal Ref: APP/ A0665/ W/ 17/ 3190601* – Clegg v Cheshire West & Chester Council; Ministry of Housing, Communities and Local Government, Secretary of State (2018) *Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd and The Howard Partnership Trust*; The Planning Inspectorate (2017) *Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust*, APP/ Y3615/W/16/3151098

cumulative impact on adjacent areas / sites. Alongside openness, permanence is the other key consideration to assess.

While recent Independent Examinations¹³ have highlighted: the importance of assessing openness as opposed to landscape; the need for assessments to consider local circumstances when determining essential areas to retain; and the need for assessments to focus on assessing Green Belt against the NPPF purposes, with robust rationale presented if any purpose is to be excluded. They have also queried whether local considerations, if used, should be accorded the same weight as the NPPF Purposes; and advocated that it is pointless to carry out Stage 2 Green Belt Assessment for sites affected by major policy constraints.

2.5 Implications for this Study

The key implications of this review for this study are:

- There is no Government defined methodology for carrying out a MOL review and local authorities have therefore taken a variety of approaches to-date.
- Assessing MOL against the designation criteria set out in the London Plan appears to be an acceptable approach, (in a similar vein to the way that Green Belt should be assessed against the Purposes set out in the NPPF) and, if any criteria is to be excluded, there must be a robust rationale. Any methodology must clearly set out how the criteria have been interpreted and should respect the local context.
- Openness and permanence are key considerations in terms of features of MOL / Green Belt; and are therefore integral to the assessment of MOL across all criteria.
- Openness should be considered not only in terms of a 'volumetric approach' (i.e. physical coverage of built form) but also in terms of 'visual elements' (for example, visual linkages to settlements, functional character and linkages to wider MOL).
- Changes to the boundaries or extent of MOL are not supported by the London Plan or the emerging draft London Plan (2019). Any proposed changes will need to be supported by a robust case, which is fully justified and evidenced. The MOL review will only provide the starting point and it will be necessary for the Council to develop the exceptional circumstances case as part of the wider Local Plan process. An argument for exceptional circumstances cannot rest on the poor-quality nature of designated land.
- Improvements to the quality of MOL are supported. A MOL review offers an opportunity to identify where such improvements are required.

¹³ Mel Middleton, Inspector (December 2017) Welwyn Hatfield Local Plan Examination Green Belt Review; David Smith, Inspector, (24 January 2018), Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030

- Extensions to MOL are supported by the London Plan (2016) and the emerging draft London Plan (2019) where the land meets at least one of the MOL criteria. Thus, non-MOL should be assessed on this basis.

3 Methodology

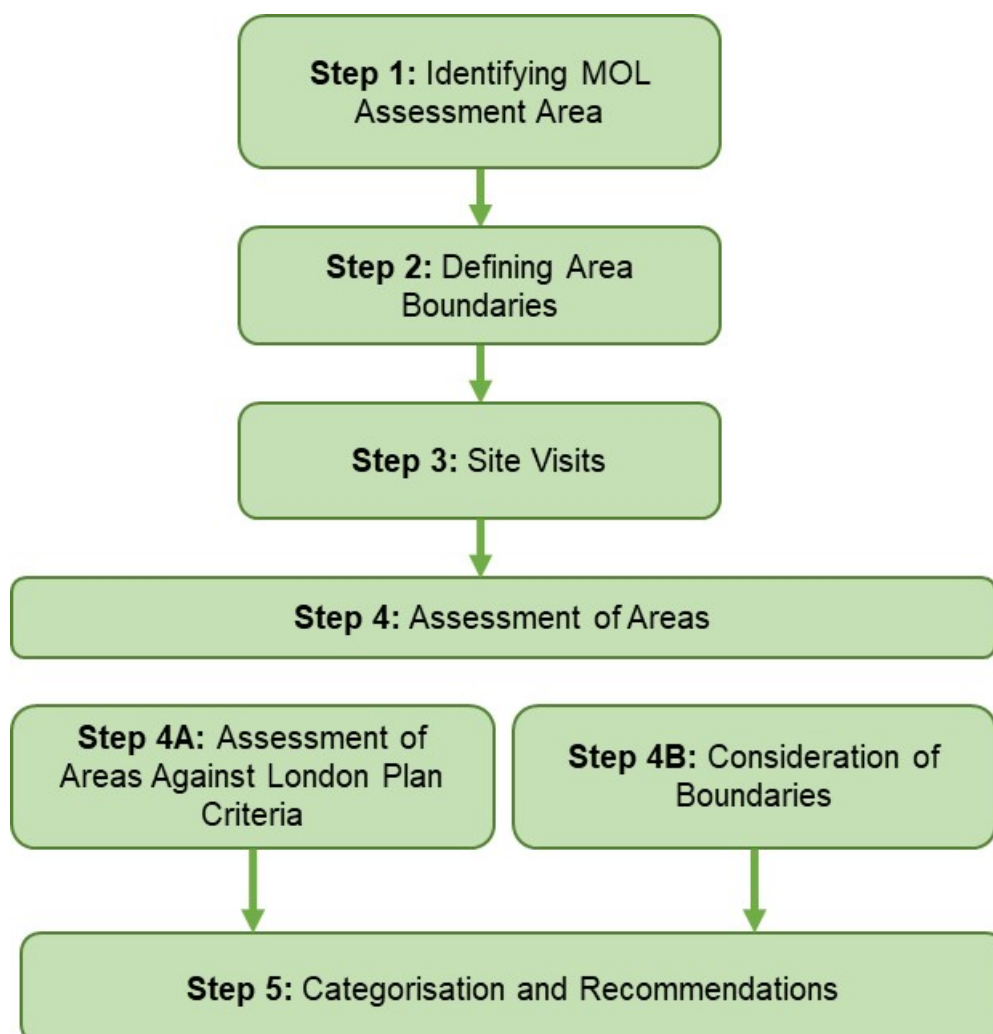
3.1 Assessment

A stepped approach was undertaken for this study, as summarised in Figure 3.1. The starting point for the study was to establish the full extent of existing MOL and any proposed areas for MOL extension (Step 1). The gross area was then subdivided into assessment areas, the boundaries of which were defined in line with the NPPF (2019, Para 139) Green Belt boundary definition, (Step 2). The MOL assessment process itself (Step 4) drew on both primary evidence from site visits (Step 3) and desktop research; and comprised:

- An assessment against London Plan MOL criteria to reach a judgement as to the performance of the MOL (Step 4a); and
- Consideration of the strength of area boundaries and whether mitigation or enhancement might be required (Step 4b).

Step 5 presents recommendations for an area, including enhancements and boundary alterations / mitigation.

Figure 3.1 MOL Assessment Process



The Council shared the methodology with their Duty to Cooperate partners. No comments were received.

3.2 Step 1: Area Identification

The scope for this review was to consider all of Lewisham's MOL, as defined in the adopted Local Plan as well as six non-MOL that be considered for inclusion in the MOL as part of the Local Plan review process. The additional sites identified for future assessment for potential MOL designation were identified in the London Borough of Lewisham Open Space Strategy 2012-2017¹⁴. The strategy deemed the sites as strategically important as their loss would significantly affect open space provision in an area of a high and growing population. One parcel (Tudor Memorial Bowling Green) was assessed following a request from a local Councillor.

It should be noted that one revision was made to the assessment area to take account of a cartographical error in the adopted policies map.

3.3 Step 2: Defining Sub-Area Boundaries

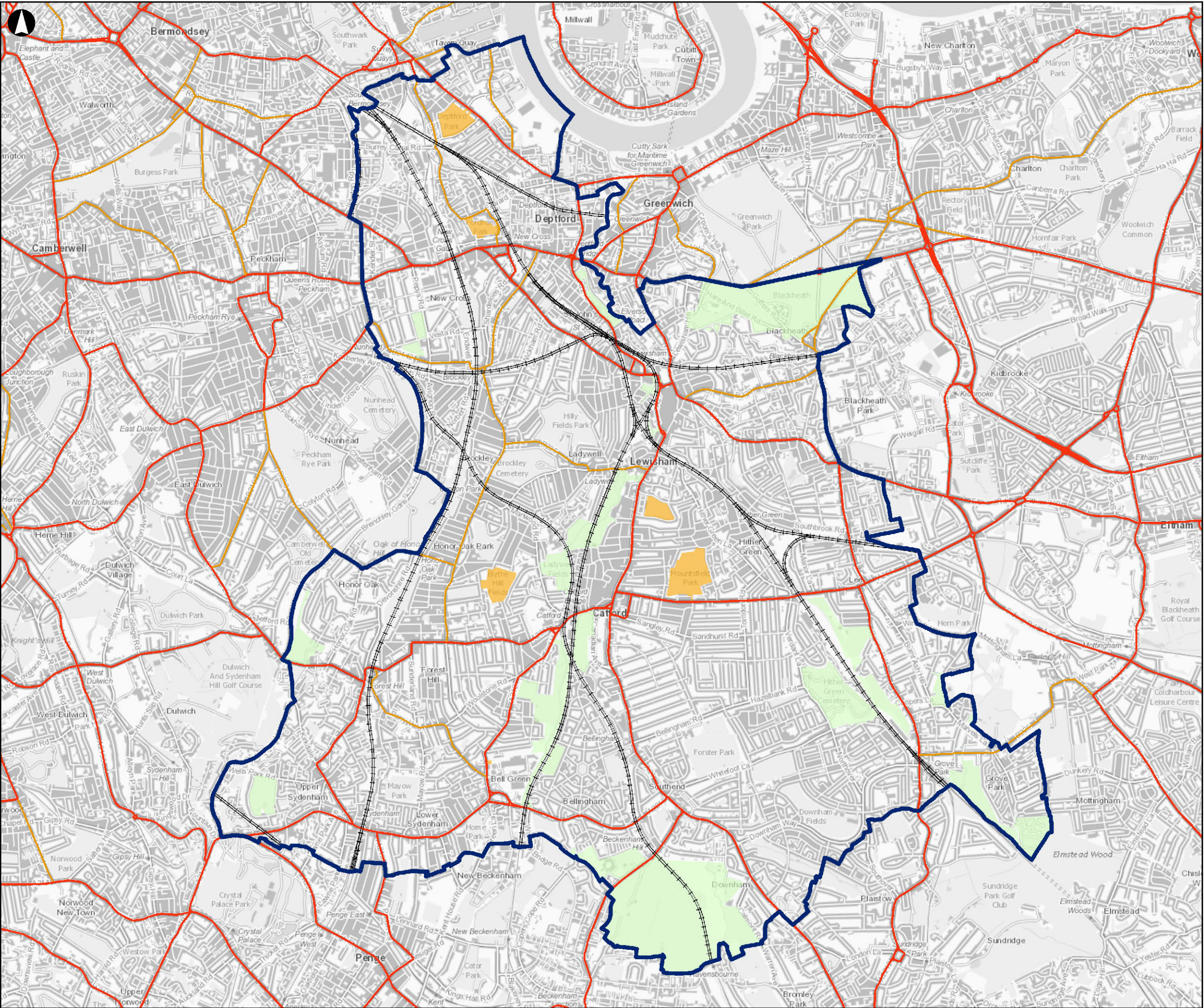
Paragraph 139 of the NPPF requires Green Belt boundaries to be defined 'clearly, using physical features that are readily recognisable and likely to be permanent'. Given that the London Plan policy suggests NPPF Green belt policy principles should be applied to MOL, it therefore follows that a similar approach can be adopted for defining MOL boundaries. In dividing the MOL into assessment areas, the following key features were used to subdivide the MOL: A and B roads and railway lines (Figure 3.2).

Area boundaries were initially defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps 'birds eye' views and Google Earth. Boundaries were adjusted as necessary, based on desktop analysis and on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement accounted for the local context of the area and involved an element of professional judgement. Each area was assigned a unique reference number, (Figure 3.3).

3.4 Step 3: Site Visits

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

¹⁴ Available here: <https://lewisham.gov.uk/mayorandcouncil/aboutthecouncil/strategies>



- LBK Borough Boundary
- Proposed MOL
- MOL
- Rail Line
- A Road
- B Road

Coordinate System: British National Grid



D2	2019-10-08	JL	KF	KF
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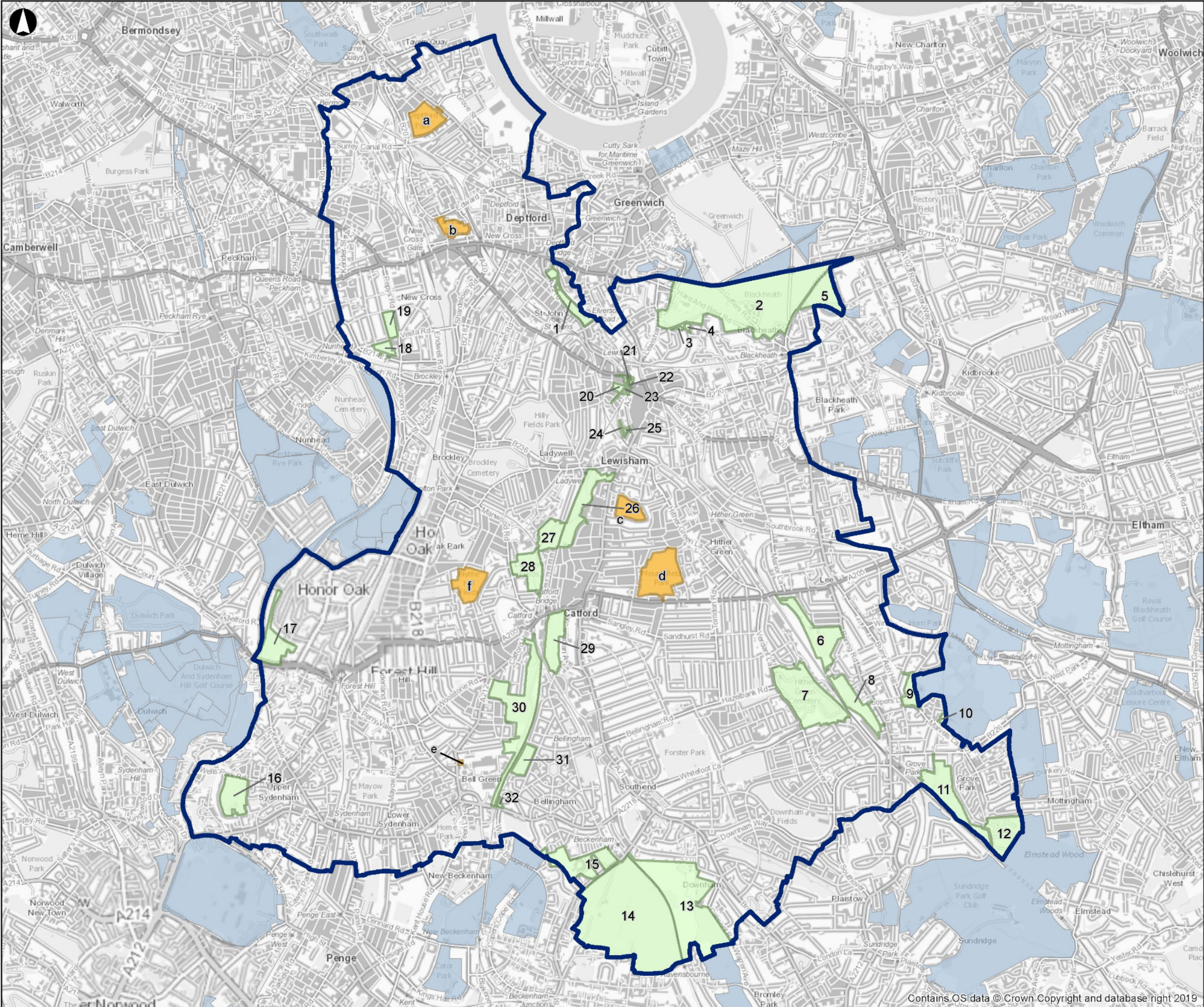
Client
London Borough of Lewisham

Project Title
MOL Review

Drawing Title
Figure 3.2 MOL and Proposed
MOL with Boundary Features

Scale at A3
1:35,000
Role

Suitability	
Draft	
Arup Job No	Rev
271571-00	D2
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001	



- Legend**
- Lewisham Borough Boundary
 - Proposed MOL (a-f)
 - MOL (1-33)
 - London MOL

Coordinate System: British National Grid

Metres

0 455 910 1,820

D2	2020-01-21	ER	AH	KF
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Project Title
MOL Review

Drawing Title
MOL Assessment Area Boundaries

Scale at A3
1:35,000
Role

Suitability
Issue
Anup Job No
271571-00
Name
001

Rev	D2
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3.5 Step 4: Assessment of Sub-Areas

The assessment process involved a mixture of evidence from desk-based research, including contextual information and secondary data sources such as aerial photography, Google Streetview, and GIS baseline and well as primary evidence obtained through the site visits. The aim of the assessment was to establish any differentiation in terms of how areas function and fulfil the purposes of MOL.

Within the adopted and emerging London Plan, the Mayor accords considerable significance to MOL as an integral part of London's green infrastructure network and effectively making it subject to the same level of protection as Green Belt. This position is also reinforced by Policies SP1, CS12 and CS18 and Core Strategy Objective 7 within the Adopted London Borough of Lewisham Core Strategy¹⁵

A key aspect of MOL of direct relevance to this assessment is the concept of openness, which is central to consideration of MOL and has also formed a fundamental part of recent appeal decisions in relation to development proposals within MOL¹⁶. In the context of MOL, openness goes substantially beyond just visual effects, relating also to spatial effects of potential development, and it should be thought of as one of the primary characteristics of such land. This concept has therefore been central to framing the criteria for the assessment, which are presented below.

3.5.1 Step 4a: Assessment Criteria and Application

The assessment criteria are based on the four criteria (A-D) underpinning MOL set out in the London Plan. A five-point scale is applied to the relevant criteria, where 1= weak and 5 = strong, with justifications set out in Table 4.1. Each MOL criterion is considered equally significant, and therefore no weighting or aggregation of scores across the criteria was undertaken. As land only needs to meet one of the criteria to be fit for MOL designation, the highest scoring criteria provides the overall score.

The following tables (Table 3.1a to Table 3.1d) also set out the data and information sources to be applied in assessing sites against each of the criteria. These criteria were used as the basis for a field survey proforma (developed in ESRI Collector to enable capture of raw data, in the field, in real time) to capture and verify information and recommendations during site visits and as the primary evidence base for reporting.

¹⁵ London Borough of Lewisham, 2011, *Lewisham Local Development Framework: Core Strategy Development Plan Document*

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

Table 3.1a Assessment criteria - London Plan MOL Criterion A: 'Contributes to the physical structure of London by being clearly distinguishable from the built-up area'

Assessment Thresholds and Definitions

Weak	Weak-Moderate	Moderate	Moderate-Strong	Strong
<p>Parcel is significantly eroded by built/ancillary development which creates highly notable incursions in the parcel/blurs the relationship between built form and open space/creates a highly permeable boundary with a very weak sense of contrast between the two.</p> <p>And/or: Urbanising influences includes adjacent development directly impacting on the visual openness, likely not to be screened and affecting the majority of the parcel, such that it makes little or no contribution to structure of a neighbourhood.</p> <p>And/or: Very weak landscape structure and/or low levels of topographic variation, such that edge conditions are very poorly defined.</p>	<p>Built development is notable in parts of the parcel.</p> <p>And/or: Sense of openness is relatively weakly defined with a clearly apparent sense of erosion by development and urbanising influences. Contributes to physical structure at a very local (neighbourhood) scale</p> <p>And/or: Fairly low level of topographic variation contributing to definition of edge conditions, or partly fragmented landscape structure (likely to have great enhancement potential).</p>	<p>Built development is generally absent across much of the area.</p> <p>And/or: Sense of openness is mostly well-defined with only localised erosion by development and urbanising influences. Contribution to physical structure of London is apparent, although likely to be fragmented rather than intact.</p> <p>And/or: Reasonable level of topographic variation contributing to definition of edge conditions, or fair landscape structure (which may have enhancement potential).</p>	<p>Built development is largely absent.</p> <p>And/or: The parcel provides a clear and well-defined sense of openness and separation, such that sense of openness is more than apparent. Notable contribution to the structure of London – large scale greenspace asset which provides clear distinction and sense of separation, although may have some localised erosion.</p> <p>And/or: Contains strong and possibly varied landscape structure and/or topographic variation, which define edge conditions.</p>	<p>Built development is completely absent.</p> <p>And/or: The parcel provides a very clear and highly defined sense of openness and separation, such that openness is the defining/dominant characteristic of the parcel. Highly notable and prominent contribution to structure of London (e.g. river valley, Metropolitan scale park or greenspace)</p> <p>And/or: Contains very strong and varied landscape structure (intimate spatial scale and landscape mosaic) and/or topographic variation, which define edge conditions – a hard, well-defined boundary.</p>

Potential data and information sources: Ordnance Survey 1:25,000 Explorer mapping and MasterMap data, aerial photography, historic mapping/map regression where available/relevant, field survey.

Table 3.1b Assessment criteria - London Plan MOL Criterion B: 'Includes open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London'

Assessment Thresholds and Definitions

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

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

Table 3.1c Assessment criteria - London Plan MOL Criterion C: 'Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value'

Assessment Thresholds and Definitions

Weak	Weak-Moderate	Moderate	Moderate-Strong	Strong
<p>Parcel is not part of nor linked to landscapes of national importance (Registered Battlefields or Registered Parks and Gardens).</p> <p>And/or: Parcel may make a very weak or tangential contribution to a locally listed landscape.</p> <p>And/or: Parcel is/forms part of a very local level GI/recreational asset.</p> <p>And/or: Is un-designated for ecological interest, supporting common-place habitats.</p> <p>And/or: Parcel may be in very poor condition/very poorly maintained and managed.</p>	<p>Parcel may form at most a tertiary part of a Registered Park and Garden (e.g. on its periphery).</p> <p>And/or: Parcel is partially linked to a GI asset of Metropolitan significance.</p> <p>And /or: Parcel may be designated as a candidate Site of Importance for Nature Conservation (SINC)/ Site of Nature Conservation Interest (SNCI), or may support habitats of parish value.</p>	<p>Parcel may form a secondary or small/minor part of a Registered Park and Garden (e.g. within the boundary but not forming one of the features listed in the citation/not part of a designed view included in the listing).</p> <p>And/or: Parcel forms a small part of or is partially linked to a GI asset of Metropolitan significance.</p> <p>And /or: Parcel may be designated at a sub-regional or district level for</p>	<p>Parcel forms part of an important part of a Registered Park and Garden and is likely to contain some features listed in the citation/ parcel contains a Registered Park and Garden in its entirety.</p> <p>And/or: Parcel forms an important part of a Regional Park or other green space of Metropolitan importance.</p> <p>And/or: Parcel is ecologically rich, possessing either nationally important habitats or is designated for ecology at the national level, as a Site of Special Scientific Interest (SSSI), a National Nature Reserve (NNR), or both.</p>	<p>Parcel forms a key location in a World Heritage Site or is a key part of a Registered Park and Garden/contains many key features listed in the citation/contains a Registered Park and Garden in its entirety.</p> <p>And/or: Parcel forms an essential part of a Regional Park or other green space of Metropolitan importance</p> <p>And/or: Parcel is ecologically outstandingly rich, possessing either internationally important habitats or is designated for ecology at such a level – RAMSAR*/Natura 2000*/Special Protection Area (SPA)/Special Areas of Conservation (SAC)/SSSI, or both. (*for definitions see Appendix A1 Glossary and Definitions)</p>

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

Table 3.1d Assessment criteria - London Plan MOL Criterion D: 'Forms part of a Green Chain or link in the green infrastructure network and meets one of the above criteria'

Assessment Thresholds and Definitions

Weak	Weak-Moderate	Moderate	Moderate-Strong	Strong
A GI asset with very low or poor levels of accessibility and connectivity.	Has a generally fragmented green link/access network, likely to be of at most secondary level of importance to the GI network (e.g. may also include local routes/Public Rights of Way (PRoW)).	Has a partial green link/access network, which may in part fulfil a strategic function as part of a wider GI network.	Parcel connects to a green link of London-wide importance, such as a Green Chain. Likely also to contain a mostly well-connected green link network.	Parcel contains or forms part of a park of Metropolitan importance or contains part of a green link of London-wide importance, such as a Green Chain. Likely also to contain an extensive or well-connected green link network

Potential data and information sources: South London Green Chain dataset

3.6 Step 4b: Consideration of Boundaries

Step 4b considered the relative strength of the MOL boundary in relation to the requirements of paragraph 139 of the NPPF for boundaries to be defined *'clearly, using physical features that are readily recognisable and likely to be permanent'*.

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

3.7 Step 5: Categorisation and Recommendations

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

4 MOL Key Findings and Recommendations

The section summarises the key findings and recommendations from the MOL review. Table 4.1 presents a summary of the overall scores of the areas against the criteria and methodology outlined in Section 3. Full assessment profiles, scoring and recommendations based on the assessment are shown in the proformas in the Annex Report.

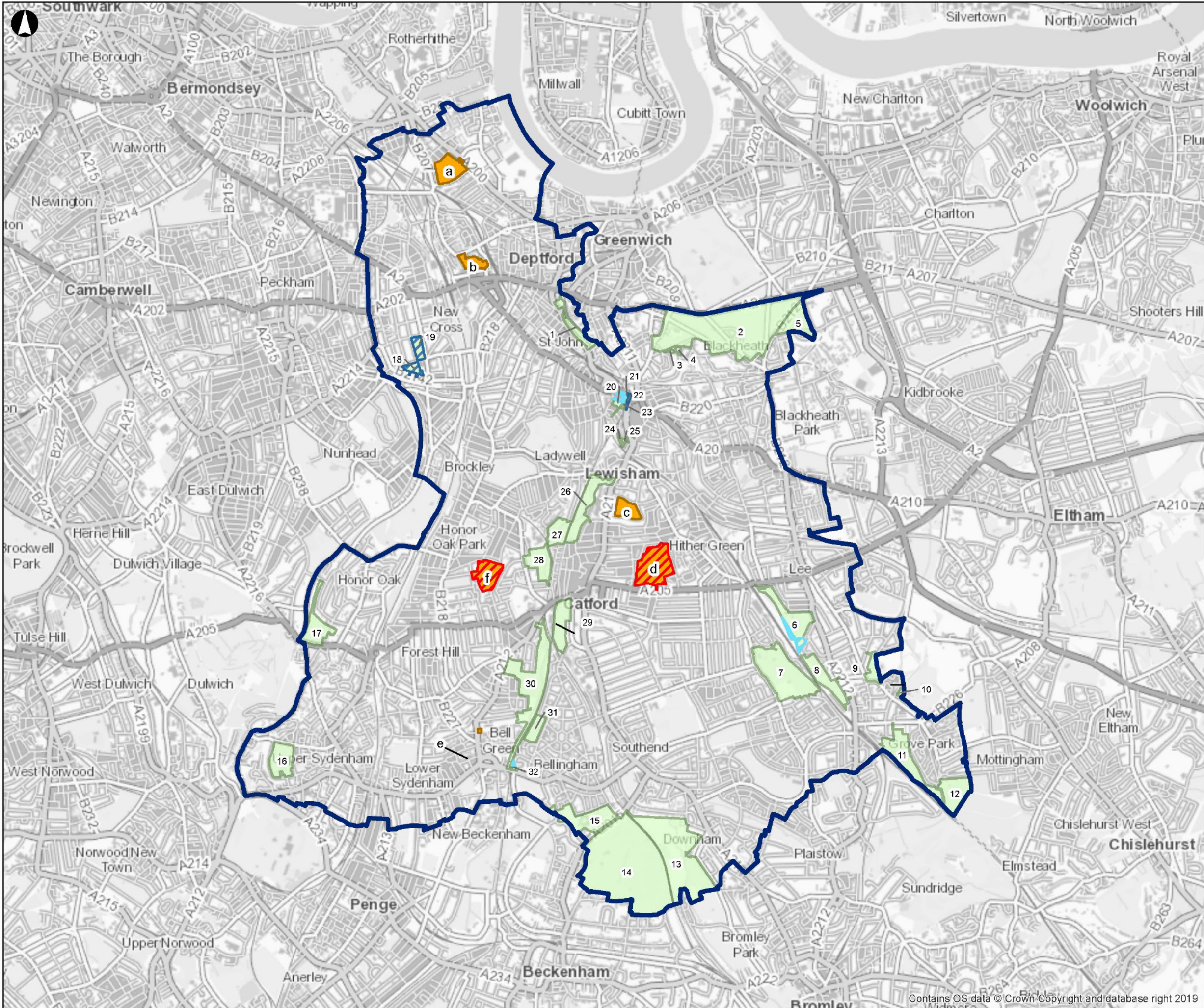
Figure 4.1 presents the overall recommendations in terms of whether existing areas of MOL should retain their current designation or be subject to further consideration for whole or partial release; and whether sites proposed for MOL designation meet the London Plan criteria.

Table 4.1 Area Assessment Summary

Summary table whereby: 1= Weak, 2= Weak-moderate, 3 = Moderate, 4= Moderate-strong, 5= Strong. This table summarises information from the pro forma assessment summaries detailed in the Annex report. It is not necessary to read through this table if you are using a text reader, as the information is expanded upon and explained more fully in the pro forma assessments.

MOL Area	Criterion A	Criterion B	Criterion C	Criterion D	Overall Rating	Strategy	MOL Status
MOL area 1	4	3	3	3	4	Conserve, Enhance	Retain
MOL area 2	4	3	5	5	5	Conserve, Enhance	Retain
MOL area 3	3	2	3	2	3	Conserve, Enhance	Retain
MOL area 4	3	2	2	2	3	Conserve, Enhance	Retain (Minor expansion of the parcel is proposed to create a stronger boundary.)
MOL area 5	4	2	4	3	4	Conserve, Enhance	Retain
MOL area 6	3	2	2	2	3	Conserve, Enhance, Restore, Review	Consider further for partial release
MOL area 7	4	3	2	3	4	Conserve, Enhance	Retain
MOL area 8	4	3	3	4	4	Conserve, Enhance, Restore	Retain
MOL area 9	3	3	2	1	3	Conserve, Enhance, Review	Retain
MOL area 10	4	1	2	2	4	Conserve, Enhance, Restore	Retain
MOL area 11	4	2	2	4	4	Conserve, Enhance	Retain
MOL area 12	4	3	5	2	5	Conserve, Enhance	Retain
MOL area 13	4	4	4	4	4	Conserve, Enhance	Retain
MOL area 14	5	5	5	5	5	Conserve	Retain
MOL area 15	3	2	2	2	3	Conserve, Enhance	Retain
MOL area 16	3	2	2	4	4	Conserve	Retain
MOL area 17	3	5	5	4	5	Conserve	Retain
MOL area 18	2	2	2	0	2	Review	Consider further for release

MOL Area	Criterion A	Criterion B	Criterion C	Criterion D	Overall Rating	Strategy	MOL Status
MOL area 19	2	2	2	0	2	Review	Consider further for release
MOL area 20	4	3	2	4	4	Conserve, Enhance	Consider further for partial release
MOL area 21	1	1	1	0	1	Review	Consider further for release
MOL area 22	1	1	1	0	1	Review	Consider further for release
MOL area 23	4	2	2	3	4	Conserve, Enhance	Retain
MOL area 24	3	1	1	3	3	Conserve, Enhance	Retain
MOL area 25	3	1	1	2	3	Conserve, Enhance	Retain
MOL area 26	4	3	4	4	4	Conserve	Retain
MOL area 27	3	3	3	4	4	Conserve	Retain
MOL area 28	4	3	3	4	4	Conserve	Retain
MOL area 29	3	2	1	1	3	Conserve, Enhance	Retain
MOL area 30	4	3	3	4	4	Conserve, Enhance	Retain
MOL area 31	3	2	2	1	3	Conserve, Enhance	Retain
MOL area 32	3	2	2	3	3	Conserve, Enhance	Consider further for partial release
MOL area A	2	2	2	0	2	Review	Not recommended as MOL
MOL area B	2	2	2	0	2	Review	Not recommended as MOL
MOL area C	2	2	2	0	2	Review	Not recommended as MOL
MOL area D	3	2	2	0	3	Conserve, Review	Consider further as MOL
MOL area E	2	1	2	0	2	Review	Not recommended as MOL
MOL area F	3	2	2	0	3	Conserve, Enhance, Review	Consider further as MOL



Legend

- Lewisham Borough Boundary
- Existing MOL Parcels
 - Consider Further for Full Parcel Release
 - Consider Further for Partial Parcel Release
 - Retain as MOL
- Proposed MOL
 - Consider Further for MOL
 - Not Recommended as MOL

Coordinate System: British National Grid



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Project Title
MOL Review

Drawing Title
Figure 4.1: MOL Review Recommendations

Scale at A3
1:40,000
Role

Suitability	
Issue	
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5 Conclusions

5.1 Performance Assessment

This study reviewed the existing extent of Lewisham's MOL, subdivided into 32 areas, and assessed its performance against the London Plan MOL criteria. Consideration was also given to the strength of existing boundaries and whether they were 'clearly defined using physical features that are readily recognisable and likely to be permanent' (in line with NPPF paragraph 139).

The majority of the MOL in Lewisham performs moderately to strongly against the London Plan MOL criteria and therefore its MOL designation should be retained. The recommendations for potential changes are as follows:

- Three areas should be considered further for potential partial release. The areas for potential release relate to those parts that are already developed.
- Four areas should be considered further for potential total release. Two of these areas no longer contain open land following the reconfiguration of roads / regeneration scheme in Lewisham town centre. The other two areas perform weakly against all MOL criteria and while they have locally important recreation, historic or biodiversity value, these features are protected by other designations.
- There should be a small extension of the MOL in one parcel to create a stronger boundary.

The study also considered whether six potential areas should be designated as MOL by assessing their performance against the London Plan MOL criteria. The overall recommendations for these areas are:

- Two areas should be considered further for designation as MOL as part of the development of the Lewisham spatial strategy.
- Four areas are not recommended as MOL.

5.2 Potential Amendments to MOL

The recommendations from the MOL review should be considered by the Council in the decision-making process for Lewisham's spatial strategy. A summary of the recommendations can be found in Table 4.1, with mapped representation in Figure 4.1.

It should be noted that the relative strength of boundaries was not a determining factor in the final recommendations given it may be possible in certain circumstances to secure mitigation to strengthen currently weak boundaries or to provide new boundaries where gaps exist (e.g. through a

site allocation policy). While it is noted where this might be required in the final recommendations, the decision on the appropriateness of strengthening existing, or creating new boundaries, will be for the Council to make, taking into account how such mitigation might be secured.

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

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

A1 Glossary of Terms and Acronyms

Term	Definition
BAP	Biodiversity Action Plan A BAP describes biological resources in an area and provides detailed plans for conservation of these resources.
Blue Ribbon Network	A spatial policy covering London's waterways and water spaces and land alongside them. It includes the Thames, the canal network, the other tributaries, rivers and streams within London and London's open water spaces such as docks, reservoirs and lakes.
EIP	Examination in Public The process by which a planning inspector publicly examines a Development Plan Document.
Green Chain	Areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian and cycle routes.
Green infrastructure (GI)	The multifunctional, interdependent network of open and green spaces and green features (e.g. green roofs). It includes the Blue Ribbon Network but excludes the hard-surfaced public realm. This network lies within the urban environment and the urban fringe, connecting to the surrounding countryside. It provides multiple benefits for people and wildlife including: flood management; urban cooling; improving physical and mental health; green transport links (walking and cycling routes); ecological connectivity; and food growing. Green and open spaces of all sizes can be part of green infrastructure provided they contribute to the functioning of the network as a whole.
LBL	London Borough of Lewisham
LNR	Local Nature Reserve
MOL	Metropolitan Open Land
NATURA 2000	The network of nature protection areas within the European Union, made up of Special Areas of Conservation and Special Protection Areas.
NNR	National Nature Reserve (NNR)
NPPF	National Planning Policy Framework
PROW	Public Right of Way
PPG	Planning Practice Guidance
RAMSAR	Ramsar are wetland of international importance that have been designated under the criteria of the Ramsar Convention on Wetlands.

Term	Definition
SAC	Special Area of Conservation A SAC protects one or more special habitats and / or species – terrestrial or marine – listed in the EU Habitats Directive.
SINC / SMI	Site of Importance for Nature Conservation SINCs are sites which are recognised as being of particular importance to wildlife and biodiversity. SINCs are divided into Sites of Metropolitan Importance for Nature Conservation (SMI), Site of Borough Importance for Nature Conservation (Grade I and Grade II) and Site of Local Importance for Nature Conservation. Also known nationally as Local Wildlife Sites.
SNCI	Site of Nature Conservation Interest SNCIs are sites which contain features of substantive nature conservation value at a local level.
SPA	Special Protection Area A SPA protects one or more rare, threatened or vulnerable bird species listed in Annex 1 of the EU Birds Directive, and regularly occurring migratory species.
SSSI	Special Site of Scientific Interest SSSI are areas of special interest due to their fauna, flora, geological or physiographical features.