

Matter 4: Green Belt Review
Reigate and Banstead Development
Management Plan Examination

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1. Introduction

- 1.1. This Statement has been prepared by Indigo Planning on behalf of The School Government Publishing Company Ltd in response to the Inspector's Schedule of Matters, Issues and Questions published as part of the Reigate and Banstead Development Management Plan (DMP) Examination.
- 1.2. The School Government Publishing Company Ltd owns the land to the south of the former Darby House. This has been promoted throughout the DMP process. The site has been identified as a proposed sustainable urban extension site by the Council and is identified as Site ERM4b in the DMP.
- 1.3. This Statement addresses the Inspector's questions under Matter 4 which relate to the following issue:

"Is there a need to review Green Belt in the borough and is the approach justified, effective and consistent with national policy in the NPPF"
- 1.4. This Statement has been submitted alongside other Statements submitted in respect of Matters 5 and 9.

2. Matter 4a: Question 1

Question 1: Is the Green Belt review consistent with national policy in the NPPF and PPG's and with the policies in the Core Strategy?

- 2.1. The NPPF seeks the alignment of economic and housing evidence in order to support the delivery of necessary growth. Paragraph 135 advises that the Green Belt boundaries should ensure consistency with the Local Plan strategy for meeting identified development requirements and not include land which it is unnecessary to keep permanently open. In this case the adopted Core Strategy (July 2014) currently sets the Council's strategy to deliver this growth in the Borough.
- 2.2. Any review of existing Green Belt cannot be considered in isolation but must be undertaken in the plan-making process in the context of the key roles established at paragraphs 7-9 of the NPPF. Paragraph 9 of the NPPF requires Plans and decisions to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas. The overarching housing need and the spatial strategy established by the Core Strategy provides the local focus for the preparation of the DMP.
- 2.3. Policy CS3 of the Core Strategy commits the Council to undertaking a Green Belt Review to inform the preparation of the DMP. The policy also confirms that subject to the findings of the Green Belt Review and where exceptional circumstances exist, such as, meeting the housing need and objectives of the Core Strategy, land will be released from the Green Belt for allocation as SUEs.
- 2.4. On this basis we consider that the Green Belt review is consistent with the NPPF and policies contained within the adopted Core Strategy.
- 2.5. The Council's Green Belt Review conforms with the evidence which supported the preparation of the Core Strategy.
- 2.6. The Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012), which supported the Core Strategy, assessed the merits of different scales of urban extensions and 20 broad areas of search adjoining the Borough's urban areas. The outputs of this work confirmed the three broad areas of search for SUE sites established in Policy CS6 of the Core Strategy.
- 2.7. In the first instance the Green Belt Review sub-divided the established broad areas of search into separate land parcels. This process was also informed by the Council's technical review of land parcels in respect of infrastructure requirements, design issues and required mitigation measures (see the SUE (Stage 2) Site Specific Technical Report (June 2016)). We consider that the methodology underpinning this initial phase of the Green Belt Review conforms with policy principles of the NPPF (paragraph 139) and Core Strategy Policy CS3.
- 2.8. The second phase of the Green Belt Review was to assess these established land parcels against the NPPF's five defined Green Belt purposes (paragraph 134). Again, we consider that the methodology underpinning this element of the Green Belt Review conforms with the requirements of local and national policies. However, we consider that there are some inaccuracies in the actual assessment and subsequent ranking of some sites (see our answer to Question 2 for details).
- 2.9. The final phase of the Green Belt Assessment of land parcels consisted of ranking each site by virtue of their performance in the assessment phases. We consider this to be a fair way of determining the most suitable sites for release.

- 2.10. Having reviewed the evidence base we conclude that the Green Belt Review process is robust in the policy context provided by the NPPF and the Core Strategy. Accordingly, it is considered that the SUE sites proposed for release will not damage the integrity of the Green Belt following their removal and subsequent development.

3. Matter 4a: Question 2

Question 2: Is the methodology and the basis for assessing, selecting and rejecting sites appropriate, objective, consistent, and justified with robust evidence?

- 3.1. As stated in our answer to Question 1 we endorse the methodology behind the Council's site selection process and Green Belt Review. However, we do have concerns regarding the consistency and accuracy of the assessment of individual sites set out in Appendix 1 of the Green Belt Review.
- 3.2. The outputs of this assessment process informs the ranking of the SUE sites for release identified in Policy MLS1. As such, it is vital that the assessment process is robust.
- 3.3. The Green Belt Review assesses each land parcel against the five purposes of the Green Belt, as set out at paragraph 134 of the NPPF, and scores whether a site has a higher, moderate or lower impact on the Green Belt Purpose. Each of these purposes have been assessed against the scoring criteria identified at pages 14-19 of the Green Belt Review.
- 3.4. The Council's overall conclusion for each parcel is based on a simple cumulative scoring mechanism (1, 2 and 3 respectively for ratings of lower, moderate and higher). As there is no implied "importance" in national policy between the various purposes, no weighting has been applied.
- 3.5. The Council's conclusions of this assessment for the Green Belt sites in East of Redhill and East of Merstham is provided in Table 1 below.

Table 1: The Council's Assessment of Green Belt Sites

Broad Area	Land Parcel	Green Belt Purpose					Priority for protection
		1	2	3	4	5	
East of Redhill	ERM1	Lower	Moderate	Moderate	Lower	Lower	3
East of Merstham	ERM5	Lower	Lower	Moderate	Lower	Lower	4
East of Merstham	ERM4	Moderate	Lower	Moderate	Lower	Lower	3
East of Redhill	ERM2/3	Lower/ Moderate	Lower/ Moderate	Moderate/ Lower	Lower	Lower	4/3

- 3.6. In our view the Council's assessment and scoring of land parcels has not been consistent. Therefore, the protection priority of each land parcel stated in Table 1 is not robust.
- 3.7. We set out below our own assessment of sites in East of Redhill and East of Merstham against the NPPF's Green Belt Purposes. The assessment adopts the Council's scoring mechanism.
- 3.8. The Green Belt Review assesses sites ERM4a and ERM4b as a single site. As acknowledged in the HELAA and the policies of the DMP (including the minor modifications August 2018) these are separate development sites under separate ownerships. Our assessment splits parcel ERM4 into the two individual SUE allocations sites ERM4a and ERM4b.

Purpose 1

- 3.9. In terms of the criteria for checking the unrestricted sprawl of a large built up area, Table 2 of the Green Belt Review states that sites will be given a moderate score if:
- Partially contained – a minimum of 30% of the parcels boundary is contiguous with the existing urban area and the parcel has some appreciable relationship with the urban area; and
 - The boundaries of the parcel are partially formed by features classified as strong in Table 1 or the boundaries intermittently change between weak and strong features.
- 3.10. Strong boundaries are defined as prominent landscape features (valley, ridgelines, steep hills), dense tree belts, dense hedgerows, protected woodlands, motorways and major distributor roads, railway lines, established building lines/curtilage boundaries.
- 3.11. Weaker boundaries are defined as intermittent or unclear settlement boundaries, private/unmade roads or tracks, power lines, fencing, sparse or intermittent tree belts, sparse or intermittent hedgerows, unprotected woodland, field boundaries.
- 3.12. The site will be given a 'Lower' score if:
- A minimum of 65% of the boundary of the parcel is adjacent to the existing urban area. As a result, the parcel feels enclosed by and well related to the existing urban area. Parcels with a reasonable level of contiguity with the urban area but which are enclosed externally by other strong features (e.g. motorway) are also considered to be well contained.
 - The boundary of the parcel is predominantly formed of features classified as strong.
- 3.13. The sites that make up ERM4 (ie ERM4a and ERM4b) score very differently when assessed against these criteria.
- 3.14. It is also worth highlighting that the original green belt review of ERM4 included the additional parcel of land to the east. This site was subsequently excluded from the Regulation 18 consultation, but the Green Belt Review was not revised to take account of the changes in boundary. Therefore, as a starting point, the assessment of site ERM4 as a whole was already at a disadvantage as it includes a more sensitive parcel of land that is no longer being considered.
- 3.15. ERM4a has a partial boundary with the existing urban area which bounds the recent housing development to the north west of the site. The remainder of the site is relatively open to the wider Green Belt. The site does however benefit from relatively strong boundaries in the form of a dense tree belt / hedgerow which surrounds the majority of the site although this is broken in parts to the east.
- 3.16. In contrast, ERM4b has a strong relationship with housing development that is located immediately to the north which lies across the entirety of its northern boundary. It also shares its entire western boundary with Woodfield School which lies to the west. The site benefits from a boundary contiguous with the existing urban area that is proportionally greater than that of sites ERM1 and ERM5, both of which have a score of 'Lower' against purpose 1.
- 3.17. We consider that the score of 'Moderate' is appropriate for site ERM4a but ERM4b should be reclassified as 'Lower' in this regard.
- 3.18. The score of 'Lower' for site ERM5 is considered to be inappropriate as only part of the site benefits from a strong boundary with the motorway. The land to the east is open and does

not benefit from a strong boundary. The site should therefore be reclassified as 'Moderate'.

- 3.19. Site ERM2/3 has a limited a limited relationship with the existing urban area and as such be classified as at least 'Moderate' but potentially could be considered as 'Higher'.

Purpose 2

- 3.20. In terms of the criteria for preventing neighbouring towns merging into one another, we consider the Council's scoring to be reasonable.

Purpose 3

- 3.21. In terms of the criteria for assisting in safeguarding the countryside from encroachment; the Green Belt Review in Table, states that sites will be given a moderate score if:

- Up to 25% of the land area of the parcel is covered by built form/urban features; and
- The boundaries of the parcel are partially formed by features classified as strong or the boundaries intermittently change between weak and strong features.

- 3.22. The site will be given a 'Lower' score if:

- More than 25% of the land area of the parcel is covered by built form/urban features; and
- the boundary of the parcel is predominantly formed of features classified as strong.

- 3.23. ERM4a has existing development on the site that equates to less 25% of the total site area. Whilst the boundaries features are strong in places, there are weaker in others. The site' score of 'Moderate' is considered to be reasonable.

- 3.24. Whilst site ERM4b only benefits from built form in the form of an existing access, it benefits from strong boundaries around the entirety of the site. Again, its score of 'Moderate' is considered to be reasonable.

- 3.25. Site ERM1 does not benefit from any urban features. However, its boundaries could be considered as strong due to the tree belts surrounding the site. It should therefore be considered equally with ERM4b and be scored as 'Moderate'

- 3.26. Site EMR5 benefits from a limited amount of existing development on its western boundary. However, only part of the site benefits from strong boundaries. Its score of 'Moderate' is therefore reasonable.

- 3.27. Site ERM2/3 benefits from a limited amount of existing development. However, only part of the site benefits from strong boundaries. Its score of 'Moderate' is therefore reasonable.

Purpose 4

- 3.28. In terms of the criteria for preserving the setting and special character of historic towns, we consider the Council's scoring to be reasonable.

Purpose 5

- 3.29. In terms of the criteria for assisting in urban regeneration, by encouraging the recycling of derelict and other urban land, we consider the Council's scoring to be reasonable.

Conclusions

- 3.30. In light of our assessment above, we set out in Table 2 our conclusions on the comparative

assessment of Green Belt sites in East of Redhill and East of Merstham area. This takes into account the Council's scoring of 1, 2 and 3 for lower, moderate and higher ratings respectively. Table 2 scores site ERM4b most favourably of all East of Mertsam and Redhill sites. In light of our assessment site ERM4b should be given a higher priority status than other Green Belt sites in Policy MLS 1.

- 3.31. Our assessment clearly identifies inconsistencies and inaccuracies in the assessment of specific Green Belt Assessment sites. These assessments inform and influence the priority ranking of SUE sites in Policy MLS 1.
- 3.32. Accordingly, based on the Council's evidence and our own assessment the priority ranking of sites is not justified and should be reviewed as part of the Examination process.
- 3.33. Notwithstanding the above, as stated in our Matter 5 Statement, our overarching stance on Policy MLS 1 is that it should either be amended or deleted to allow all SUE sites to come forward now in order to meet the rising housing needs of the Borough.

Table 2: Indigo Comparative Assessment of Green Belt Sites

Broad Area	Land Parcel	Green Belt Purpose					Score
		1	2	3	4	5	
East of Merstham	ERM4b	Lower	Lower	Moderate	Lower	Lower	6
East of Merstham	ERM5	Moderate	Lower	Moderate	Lower	Lower	7
East of Merstham	ERM4a	Moderate	Lower	Moderate	Lower	Lower	7
East of Redhill	ERM2/3	Moderate	Lower/Moderate	Moderate	Lower	Lower	7
East of Redhill	ERM1	Lower	Moderate	Moderate	Lower	Lower	7

4. Matter 4a: Question 3

Question 3: Have all reasonable and realistic alternative sites been considered and given full reasons for selection/rejection?

- 4.1. Policy CS6 of the Core Strategy established the three broad areas of search for potential SUE sites. At the time of the Core Strategy examination the Inspector will have had due regard for the evidence base underpinning the Council's identification of these broad areas. As such, the Council should only consider potential SUE sites located inside these established areas as part of the preparation of the DMP.
- 4.2. The Sustainable Urban Extensions (Stage 2) Site Specific Technical Report, which informed the Regulation 18 DMP, identifies all of the sites considered for allocation and release from the Green Belt located within the defined broad areas of search. Table 2 of the document identifies the methodology used to assess each of the potential development sites and reasons for discounting sites. We consider the Council's methodology to be exhaustive and robust.
- 4.3. In light of the context provided by the Core Strategy we are content that the evidence base underpinning the DMP considers all reasonable and realistic alternative sites. The Sustainable Urban Extensions (Stage 2) Site Specific Technical Report provides clear and robust evidence regarding the Council's site selection process.

5. Matter 4a: Question 4

Question 4: Does the DMP clearly identify and demonstrate the exceptional circumstances necessary to justify amending the Green Belt boundaries and releasing land from the Green Belt?

- 5.1. Para 136 of the NPPF confirms that Green Belt boundaries should only be altered in exceptional circumstances that are fully evidenced and justified through the preparation of a Local Plan. Core Strategy Policy CS3 defines the exceptional circumstances under which land may be release from the Green Belt.
- 5.2. In our assessment exceptional circumstances have been triggered for the following reasons:
- The DMP is required to allocate development sites to meet housing need defined in Core Strategy policy. Without the release of land from the Green Belt and subsequent delivery of housing on these sites the Borough's housing needs would not be met over the plan period, nor would the Council be able to demonstrate a rolling five year land supply.
 - Through the Core Strategy and DMP evidence base the Council have evidenced that sustainable housing allocations cannot be made, to meet overarching housing need requirements, on land within existing urban areas or on land within the open countryside.
 - Integral to the Council's site selection process was a comprehensive Green Belt Review exercise. The Green Belt Review identified land parcels capable of coming forward for development without conflicting with part 3b of Core Strategy Policy CS3 which requires the release of sites from the Green Belt to have limited or no conflict with the purposes and integrity of the Green Belt. These land parcels are the proposed SUE allocations.
- 5.3. We consider that there is a set of exceptional circumstances which clearly justifies Green Belt release. The Council's approach to release appropriate sites from the Green Belt is supported by:
- Policies CS3 and CS6 of the adopted Core Strategy;
 - The requirement for the planning system to deliver all three dimensions of sustainable development (paragraph 8 of the NPPF);
 - The need for Plans and decisions to take into account local circumstances in order to achieve sustainable development (paragraph 9 of the NPPF);
 - The need for the planning system to be genuinely plan led (paragraph 15 of the NPPF); and
 - The Governments' objective to significantly boost the supply of homes (paragraph 59 of the NPPF).