



Development Management Plan (Regulation 19) Green Belt Review

October 2017

Disclaimer

Reigate & Banstead Borough Council makes the following disclaimer relating to the Green Belt Review and its associated documents.

- The study does not constitute a review of the Council's policy approach to the Green Belt. This is set out in the adopted Core Strategy and in the National Planning Policy Framework and remains unchanged by the contents of this report.
- The findings and evidence in this document should not be taken to imply that the Council will grant planning permission for development in any of the areas covered. All planning applications will continue to be determined against the development plan and material planning considerations, including the National Planning Policy Framework.
- The study does not change Green Belt boundaries, nor imply that the removal of any site from the Green Belt, or its allocation for development, will be included within the final Development Management Plan. Amendments to Green Belt boundaries and decisions on whether or not sites are to be allocated for development, and the timing of their release, will be taken through the Development Management Plan and Policies Map, informed by this study, other relevant evidence, public consultation, sustainability appraisal and examination by a planning inspector.
- The boundaries of land parcels in this study have been selected to enable analysis and assessment of Green Belt function. This does not limit an alteration to these boundaries for the purposes of any future allocation through the Local Plan process.
- The Council does not accept liability for any factual inaccuracies or omissions in this study. It should be acknowledged that this study is solely concerned with assessment of Green Belt function and that there may be additional constraints on sites that are not included within this document. All planning applications will continue to be determined on their own merits rather than solely relying on the information contained within this document. Individuals are advised to carry out their own analysis of site constraints for the purposes of any planning application or land purchase.

Contents

1. Introduction.....	4
Green Belt Review Status and Purpose	4
Structure of the Study	5
2. Policy Context.....	6
3. Part 1: Review of land within the broad areas of search for sustainable urban extensions.....	10
Overview.....	10
Task 1: Identifying land parcels for assessment	10
Task 2: Assessing parcels against the individual purposes of including land within the Green Belt	12
Task 3: Determining an overall priority for protection.....	20
4. Part 2: Review of minor boundary anomalies	25
Overview.....	25
Methodology	25
Summary of Assessments	28
5. Part 3: Review of washed over villages and other land inset within the Green Belt.....	32
Overview.....	32
Methodology	32
Summary of Assessments	35
6. Part 4: Exceptional Circumstances for Altering the Green Belt.....	37
Policy Context.....	37
Sustainable Urban Extensions.....	39
Green Belt Anomalies.....	43
Washed Over Villages and Inset Land.....	44
Gypsies, Travellers and Travelling Showpeople Sites	45
East Surrey Hospital	47
Safeguarded Land	53
Rural Surrounds of Horley	57
Summary of Exceptional Circumstances Conclusions.....	62
7. Conclusions and recommendations.....	64

Appendices

Appendix 1: Parcel Assessments

Appendix 2: Anomalies

Appendix 3: Washed over and inset areas

1. Introduction

Green Belt Review Status and Purpose

- 1.1 The purpose of this study is to review land around the edge of the existing built-up area in the identified areas of search for sustainable urban extensions identified in the Reigate & Banstead Core Strategy in order to assess the extent to which that land contributes to the purposes and integrity of the Green Belt. This report provides the evidence to identify where revised boundaries could be drawn in order to ensure the permanence and longevity of the Green Belt into the future.
- 1.2 In accordance with the commitment in Core Strategy¹ Policy CS3, this study forms part of the evidence base for the Development Management Plan and is intended to inform future site allocations and amendments to the Green Belt boundary on the Policies Map. It addresses the specific aims set out in Policy CS3 by:
- Considering the extent to which land within the broad areas of search identified for urban extensions contributes to the purposes of the Green Belt;
 - Considering whether there are any anomalies in the borough's Green Belt boundary and identifying where boundaries could be revised to align with clear and strong physical features;
 - Assessing whether any washed over villages should be removed from the Green Belt;
 - Assessing whether any areas inset within or currently beyond the Green Belt boundary should be included within it. Reference to 'land currently beyond the Green Belt boundary' means assessing whether any areas of the Rural Surrounds of Horley should be added to the Green Belt.
 - Considering whether there are exceptional circumstances for altering the Green Belt boundaries in the manner recommended in this report and in other documents.
 - The process of identifying land to safeguard beyond the end of the current plan period is discussed in the separate Safeguarded Land Report. The process of identifying suitable sites for gypsies, travellers and travelling showpeople is set out in the Traveller Site land Availability Assessment report. These two issues are discussed in the exceptional circumstances section of this report, but for additional detail please refer to the above-mentioned reports.
- 1.3 This review is a technical evidence base document which specifically considers the single aspect of Green Belt. **This study does not allocate land for development nor does it, in itself, remove land from the Green Belt.** It has been carried out independently of work to assess the suitability and achievability of sites for development including Sustainability Appraisal. The findings of this review and other technical work being undertaken will be

¹ www.reigate-banstead.gov.uk/corestrategy

considered together, along with any other material considerations, in the selection of potential development sites which will be set out in the final Development Management Plan. Any changes to Green Belt boundaries will only be made through the Development Management Plan and Policies Map.

Structure of the Study

- 1.4 The Green Belt Review has been separated into several separate elements in order to robustly and transparently address the specific aims and requirements set out in Core Strategy Policy CS3. The separate parts are set out below:
- **Part 1:** Review of land within the broad areas of search for urban extensions (both currently within, and beyond, the Green Belt boundary)
 - **Part 2:** Review of detailed boundary anomalies
 - **Part 3:** Review of washed over villages and land inset within the Green Belt
 - **Part 4:** Consideration of the 'exceptional circumstances' for removing the proposed land from the Green Belt. This includes a consideration of the proposed changes from the first three parts of this report; of Green Belt alterations for gypsy, traveller and travelling showpeople sites as proposed through the Traveller Site Land Availability Assessment report and the DMP; the removal of the East Surrey Hospital site from the Green Belt as proposed through the DMP; the safeguarding of Green Belt land beyond the end of the plan period, as proposed through the Safeguarded Land report and the DMP; and the proposal to add the land currently designated as the Rural Surrounds of Horley to the Green Belt.

2. Policy Context

- 2.1 The following policy is deemed relevant to the preparation of the Green Belt Review for Reigate & Banstead.

National Policy

National Planning Policy Framework

- 2.2 The National Planning Policy Framework (NPPF)² sets out the Government's planning policies for England. At the heart of the NPPF is the ethos that planning should contribute to achieving sustainable development.
- 2.3 The NPPF states that the Government attaches great importance to Green Belts. It sets out the five key purposes which the Green Belt serves:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.4 In terms of plan-making, the NPPF requires local planning authorities with Green Belts in their area to establish boundaries in their Local Plans. Once in place, these should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.
- 2.5 In reviewing Green Belt boundaries, the NPPF guides local planning authorities to consider their permanence for the long-term and their endurance beyond the plan period. The NPPF also provides specific guidance which local planning authorities should follow when defining boundaries, including the need to:
- Ensure consistency with the Local Plan strategy for meeting development needs
 - Define boundaries clearly, using physical features which are recognisable and permanent.
- 2.6 The NPPF also encourages plan-making authorities to consider, where necessary, identifying safeguarded land to meet future development needs (beyond the plan period), so that they can be satisfied that Green Belt boundaries will not need to be changed again at the end of the plan period.

² <http://planningguidance.communities.gov.uk/blog/policy/>

- 2.7 In exceptional circumstances, the NPPF also allows for the identification of new Green Belt and sets out a series of criteria which local planning authorities should demonstrate if such an approach is proposed. The NPPF states at paragraph 82 that if local planning authorities proposed a new Green Belt they should:
- demonstrate why normal planning and development management policies would not be adequate;
 - set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
 - show what the consequences of the proposal would be for sustainable development;
 - demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
 - show how the Green Belt would meet the other objectives of the Framework.

Local Policy

Overview

- 2.8 Reigate & Banstead Borough Council's adopted development plan consists of the adopted Core Strategy 2014 and the saved policies of the Borough Local Plan 2005, along with County Council minerals and waste plans.
- 2.9 The Council is in the process of preparing its new Local Plan. The Core Strategy 2014 forms part of this new Local Plan. It will be accompanied by the Development Management Plan (DMP) which will set out detailed policies and will also allocate land to meet the development needs set out in the Core Strategy. Any changes to the boundaries and extent of the Green Belt in the borough will be progressed through the DMP and the accompanying Local Plan Policies Map (which will replace the current Proposals Map).
- 2.10 The Core Strategy, together with the DMP (once adopted) will largely replace the Borough Local Plan 2005. They will also be supported by Supplementary Planning Documents (SPD) to provide additional detailed guidance and advice (such as on affordable housing) where this is considered necessary and appropriate.

Core Strategy

- 2.11 In relation to the Green Belt, the Core Strategy adopts a policy approach that is consistent with national policy. In terms of decision-taking it seeks to maintain a robust and defensible Green Belt and sets out that planning applications for inappropriate development in the Green Belt will be resisted except in very special circumstances.

- 2.12 The Core Strategy sets out the exceptional circumstances under which land may be removed from the Green Belt through the plan-making process. It commits the Council to carry out a Green Belt Review to inform the DMP, and establishes the scope of this work as:
- Consideration of the purposes of the Green Belt to inform the identification of land for sustainable urban extensions in the broad areas of search identified in Core Strategy Policy CS6
 - Addressing boundary anomalies throughout the borough
 - Reviewing washed over villages and areas of land inset within or currently beyond the Green Belt throughout the borough.
 - In Reigate & Banstead, land beyond the Green Belt is currently designated as the Rural Surrounds of Horley. In addition to policy CS3, in paragraph 5.2.13, the Core Strategy commits to a review of the Rural Surrounds of Horley designation through the DMP process
- 2.13 Policy CS3 sets out that land may also be safeguarded through the DMP to provide options to meet longer term development needs. This process is discussed in a separate Safeguarded Land report.

Relationship with Other Evidence

- 2.14 To support preparation of the Core Strategy, the Council carried out an assessment of potential broad locations for sustainable urban extensions.
- 2.15 The Sustainable Urban Extensions: Broad Geographic Locations Technical Report (published in November 2012) assessed the merits of different scales of urban extensions and carried out an analysis of the constraints, suitability and sustainability of 20 broad areas of search around and adjoining the borough's urban areas. The broad areas were then prioritised to determine the preferred broad locations for inclusion within the Core Strategy.
- 2.16 The broad locations set out in the adopted Core Strategy are:
- Countryside beyond the Green Belt adjoining the urban area of Horley
 - East of Redhill and East of Merstham
 - South and South West of Reigate.
- 2.17 The assessment of suitability of broad locations undertaken as part of the Core Strategy preparation also included a strategic level review of the extent to which broad areas of land fulfil and contribute to the purposes of the Green Belt. This was guided by information and principles set out in the National Planning Policy Framework. Each area of search was assessed against the following criteria to identify – in broad terms – the contribution it made to the overall function of the Green Belt and its sensitivity in terms of loss of Green Belt:
- Whether the area of search included previously developed land/was generally of an open character
 - Whether the area of search included recognisable physical features which could act as a boundary to the Green Belt

- Whether the area of search was in a strategic gap which has a role in checking the unrestricted sprawl of a large built up area
- Whether the area of search was in a local gap which has a role in preventing neighbouring towns/settlements from merging
- Whether the area of search played a role in the setting and special character of a historic town/settlement

2.18 To support the Development Management Plan Regulation 18 consultation document, the Council carried out a “Stage 2” Sustainable Urban Extensions study which focuses down in greater detail on the suitability, sustainability and achievability of individual sites. The findings of the Stage 2 study has informed the prioritisation of sites in that study and subsequent proposed site allocations, and this Green Belt Review should be read in conjunction with that study.

3. Part 1: Review of land within the broad areas of search for sustainable urban extensions

Overview

- 3.1 The primary purpose of Part 1 of this study is to provide evidence to support the identification of sites for urban extensions in the Development Management Plan (in line with Core Strategy Policy CS3 4a). In addition, the assessment of areas currently beyond the Green Belt will also be used to inform whether the land should be included, or remain excluded, from the Green Belt (reflecting Policy CS3 4c of the Core Strategy), an issue which will be discussed in more detail in part four of this paper.

Task 1: Identifying land parcels for assessment

Policy Principles	
NPPF	When defining boundaries, local authorities should: ...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent (para 85)
Core Strategy Policy CS3	<p>The Council will undertake a Green Belt review...this review will include...ensuring clearly defined and readily recognisable boundaries which are likely to be permanent and capable of enduring beyond the plan period (clause 4d)</p> <p>The Council will undertake a Green Belt review...this review will include...consideration of the purposes of the Green Belt to inform the identification of land for sustainable urban extensions in the broad areas of search identified in policy CS6 (clause 4a)...and reviewing washed over villages and areas of land inset within <u>or</u> <u>currently beyond</u> the Green Belt (clause 4c)</p>

- 3.2 The first stage of this part of the Green Belt Review was to sub-divide each of the areas of search for sustainable urban extensions identified in the Core Strategy into separate parcels which would form the basis of assessment.
- 3.3 In the areas of search around East Redhill and Merstham and South West Reigate, land directly adjacent to – and contiguous with – the existing urban area was divided up into land parcels for assessment. In addition, land around Horley (currently known as the rural surrounds of Horley) was also separated into land parcels and considered through this review. Whilst this land is currently beyond the Green Belt, it has also been considered through this review for two reasons:
1. to inform the identification of potential development sites by providing evidence to identify those areas of land which play a more important role in maintaining settlement separation and preventing sprawl and/or

most demonstrate the intrinsic beauty and character of the countryside³; and

2. to reflect the requirements of the Core Strategy that this study should include a review of areas of land currently beyond the Green Belt (Policy CS3 (4)(c)).

3.4 The guiding principles for the definition of parcels were as follows:

- The land should, as far as possible, be of similar character and land-use: this was to ensure that a robust assessment can be made of the contribution of the parcel as a whole and minimise the scope for different parts of a parcel to perform very differently against a particular purpose.
- The parcel should, as far as possible, be delineated by clearly defined boundaries: this was to reflect government guidance and to ensure that the boundary of the Green Belt has permanence into the future. It is recognised that it may not always be possible to define parcels using strong boundaries, and in some cases weaker boundaries may need to be used. **Table 1** outlines the strong and weak boundaries that have been used to delineate the parcels.

Table 1: Boundary features used to delineate parcel areas

Strong boundaries	Weaker boundaries
Prominent landscape features – valley, ridgelines, steep hills etc.	Man-made – intermittent or unclear settlement boundaries, private/unmade roads or tracks, power lines, fencing
Watercourses – rivers, streams, canals etc.	Vegetation – sparse or intermittent tree belts, sparse or intermittent hedgerows, unprotected woodland, field boundaries
Vegetation – dense tree belts, dense hedgerows, protected woodlands,	
Man-made – motorways, major distributor roads, railway lines, established building lines/curtilage boundaries	

3.5 The identification of land parcels for assessment was initially carried out as a desk based exercise using Ordnance Survey maps and the Local Plan Proposals Map, combined with aerial/birds eye photography, in order to identify site character and boundary features. In some cases, this was supplemented by planning history searches and gazetteer information to confirm land uses.

3.6 All land parcels were subsequently visited. During these visits, the uses, character and, in particular, the boundaries identified during the desk based exercise were verified and any variations recorded. Visual and written records were also made of the character, strength of boundaries and any relevant long range views as perceived “on the ground” to inform the subsequent assessment of parcels in Task 2.

³ NPPF paragraph 17

Task 2: Assessing parcels against the individual purposes of including land within the Green Belt

Policy Principles	
NPPF	Green Belt serves five purposes: to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration by encouraging the recycling of derelict and other urban land (para 80)
Core Strategy Policy CS3	<p>In exceptional circumstances land may be removed from the Green Belt...Exceptional circumstances may exist where...there is no or limited conflict with the purposes and integrity of the Green Belt (clause 3b)</p> <p>The Council will undertake a Green Belt review...this review will include...consideration of the purposes of the Green Belt to inform the identification of land for sustainable urban extensions in the broad areas of search identified in policy CS6 (clause 4a)</p> <p>The Council will undertake a Green Belt review...this review will include...reviewing washed over villages and areas of land inset within or currently beyond the Green Belt (clause 4c)</p>

- 3.7 Following the identification of land parcels in Stage 1, each individual parcel was assessed to establish the extent to which it contributes to the purposes and integrity of the Green Belt.
- 3.8 The NPPF sets out that the essential characteristic of the Green Belt is its openness and permanence. As set out in Section 2 above, it then defines five purposes of Green Belt: it is these five purposes which have formed the basis of the appraisal of each identified parcel:
- To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.9 A series of robust, transparent and measurable decision-aiding criteria were developed in order to assess the contribution made to a particular purpose: these are discussed in more detail below. Each site was assessed against these “measurable” criteria but this was also supplemented by a qualitative analysis in recognition of the fact that some individual parcels have unique characteristics/situations which may not be reflected in purely quantitative measures. As an example of the qualitative measures that were considered, in some cases the topography of a parcel made it visible at long ranges, although strong boundaries made it less visible at closer ranges. In another

instance, a parcel boundary did not adjoin the urban area, but did adjoin a built complex within the Green Belt, which was considered to contain the parcel somewhat. In a third example, a parcel had an interrelationship with the immediately surrounding countryside, but this was abruptly brought to a halt by the nearby presence of a motorway.

- 3.10 Taking account of these quantitative and qualitative aspects, each parcel was rated as making either a low contribution, medium contribution or high contribution to each particular purpose. All quantitative measures were weighted equally, with the qualitative factors overlaid where relevant to “sense check” the overall ranking. Detailed explanations of these rankings are provided in Appendix 1. These ‘purpose’ ranks were then combined into an overall rating for each land parcel.

Purpose 1: To check the unrestricted sprawl of large built-up areas

- 3.11 In Reigate & Banstead, Green Belt land is within the Metropolitan Green Belt which was designated with the primary purpose of the containment of London. However, the purpose as defined in the NPPF refers to “large built-up areas” and in this regard, the borough’s Green Belt also plays a localised role in containing the outward growth of existing urban settlements in the borough.
- 3.12 For the purposes of this study, “large built-up areas” has been taken to include the main urban settlements of Redhill/Reigate/Merstham, Banstead/Tadworth and Horley but also any other urban areas previously considered to have been of a size and character which warranted exclusion from the Green Belt.
- 3.13 The concept of ‘sprawl’ is not defined in the NPPF. For the purposes of this study, it has been taken to mean “the uncontained outward spread of a large built-up area at its periphery”.
- 3.14 In order to establish the extent to which each parcel contributes to Purpose 1, the assessment criteria set out in table 2 overleaf were applied:

Table 2: Decision aiding criteria for Purpose 1

Appraisal considerations	Decision-aiding principles	Indicative Rating	
<p>Does the parcel protect open land which is contiguous or close to larger towns?</p> <p>Does the parcel play a role in preventing ribbon development and non-compact development?</p>	<p>How well surrounded is the parcel by the existing urban area?</p>	<p><i>Not contained</i> - Little or none of the boundary of the parcel is contiguous with the existing urban area. As a result, the majority of the parcel is largely detached from – and poorly related to – the existing urban concentration. Parcels not adjacent to the urban area or separated from it by an impermeable feature (e.g. motorway) are also considered to be not contained</p>	<p>Higher importance to Green Belt</p>
		<p><i>Partially contained</i> – 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</p>	
		<p><i>Well contained</i> – 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.</p>	<p>Lower importance to Green Belt</p>
<p>Are there clear and robust boundaries to contain development and prevent sprawl in the long term?</p> <p>Would sprawl be stopped by other barriers other than land within the Green Belt?</p>	<p>What is the strength of the boundaries of the parcel?</p>	<p><i>Weak</i> – the boundaries of the parcel are predominantly formed by features classified as weak in Table 1 above</p>	<p>High importance to Green Belt</p>
		<p><i>Average</i> – 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</p>	
		<p><i>Strong</i> – the boundary of the parcel is predominantly formed of features classified as strong in Table 2 above.</p>	<p>Lower importance to Green Belt</p>

Purpose 2: To prevent neighbouring towns from merging into one another

- 3.15 Whilst the Green Belt plays a strategic role in maintaining separation between main towns, given the urban context of Reigate & Banstead – in particular the fragmented nature of the urban area in parts of the borough – it also plays a more local role in preventing individual urban settlements and villages from merging into a single urban mass. In the assessment of Purpose 2, reference

to “towns” was taken to mean all individual urban settlements to ensure this local role is properly recognised.

- 3.16 In order to establish the extent to which each parcel contributes to Purpose 2, the focus of measurable criteria was on separation between settlements in “plan form”, that is the role which a parcel plays in maintaining a particular “as the crow flies” separation distance between two particular settlements or villages.

Table 3: Decision aiding criteria for Purpose 2

Appraisal considerations	Decision-aiding principles	Indicative Rating
Does the parcel protect open land which is contiguous or close to larger towns?	<i>Essential gap</i> – Removal of the parcel from the Green Belt would leave a settlement gap of less than 1km	Higher importance to Green Belt
	<i>Narrow gap</i> – Removal of the parcel from the Green Belt would result in a settlement gap of less than 2km	
	<i>Wide gap</i> – Removal of the parcel from the Green Belt would leave a settlement gap	Lower importance to Green Belt
Is the settlement gap vulnerable or sensitive to coalescence?	<i>Critical</i> – Removal of the parcel would lead to the existing gap being closed by more than 30%	Higher importance to Green Belt
	<i>Partial</i> – Removal of the parcel would lead to the existing gap being closed by more than 15%	
	<i>Limited</i> – Removal of the parcel would lead to the existing gap being closed by less than 15%	Lower importance to Green Belt

- 3.17 However, it was recognised that in the case of this purpose, there is also a need for a qualitative consideration of both the sensitivity of a particular settlement gap and the perception of merging “on the ground”. Whilst this particular issue has been afforded differing weight by Inspectors (and the Secretary of State) at appeal⁴⁵, it has nonetheless been recognised as a reasonable consideration in assessing this Green Belt purpose.
- 3.18 For the purposes of this study, a series of factors including the landscape between settlements and whether there are intervening visual/physical features (such as motorways, railways, landforms, vegetation etc.) were considered. This has allowed recognition to be given to the fact that, in some cases, the intervening landscape can change the perception of a settlement gap and reduce (or increase) its vulnerability to visual coalescence at a local scale. Whilst this more descriptive assessment has not been rated (e.g. as high, medium or lower importance in its own right), it has, where relevant, been reflected in the overall balance of the appraisal and rating for this

⁴ For example Land at Glebelands, Thundersley (APP/M1520/A/12/2177157)

⁵ For example Land at Hunting Butts Farm, Cheltenham (APP/B1605/A/11/2164597)

purpose. Where this is the case, this is reflected in the parcel assessments in Appendix 1.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 3.19 The NPPF sets out that a core principle of the planning system is that it should recognise the intrinsic character and beauty of the countryside. The NPPF is clear that one of the essential characteristics of Green Belts is openness and that, once established, Green Belts should be enhanced for beneficial use.
- 3.20 For the purposes of this assessment, the concept of ‘countryside’ was considered to stand in opposition to the ‘urban’. The countryside is characterised by a relative lack of built form, and where development does take place in the countryside (such as barns and other farm buildings) it tends to be smaller in scale and in overall development footprint than urbanised built environment uses. Consequently, the proportion of land within a parcel that is covered with built form was felt to be a good proxy definition for ‘countryside’, with areas containing a relatively high proportion of built form being considered ‘more urban’.
- 3.21 In the assessment of Purpose 3, the focus of measurable criteria was therefore on establishing the openness of each individual parcel, predominantly through reference to the extent of existing built development and urban form. Although considered under Purpose 1, boundary strength was also reflected in the measurable criteria for this purpose given the role which boundaries can play in preventing encroachment, both physically and visually.

Table 3: Decision aiding criteria for Purpose 3

Appraisal considerations	Decision-aiding principles	Indicative Rating
Is the parcel largely open and rural in character?	<i>Undeveloped</i> – less than 10% of the land area of the parcel is covered by built form/urban features	Higher importance to Green Belt
	<i>Largely undeveloped</i> – up to 25% of the land area of the parcel is covered by built form/urban features	
Are there strong boundaries which would prevent physical or visual encroachment in the long term?	<i>Partially developed</i> – more than 25% of the land area of the parcel is covered by built form/urban features	Lower importance to Green Belt
	<i>Weak</i> – the boundaries of the parcel are predominantly formed by features classified as weak in Table 1 above	Higher importance to Green Belt
	<i>Average</i> – 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	
	<i>Strong</i> – the boundary of the parcel is predominantly formed of features classified as strong in Table 2 above.	Lower importance to Green Belt

- 3.22 It was again recognised for this purpose that there was a need for a qualitative consideration of the extent to which a parcel forms part of the wider countryside fabric. Whilst this is in part related to parcel boundaries, it entails a more descriptive understanding of the level of inter-visibility and relationship between a parcel and the surrounding countryside, recognising that perceived impact of encroachment arising from a parcel which is “severed” from the wider countryside by strong boundary features will be less than a parcel where long range views across it and the wider countryside are possible. Again, whilst this more descriptive assessment has not been given its own high, medium or low rating it has, where relevant, been reflected in the overall appraisal and rating for this purpose.
- 3.23 Consideration was also given to whether a parcel contributes to, or provides, “beneficial uses” as set out in the NPPF (para 81). The rationale behind this is that those parcels which already support these “beneficial uses” are already operating as positive and valuable countryside. Issues such as whether the parcel provides formal sport/recreation space, is covered by a network of rights of way (thus accessible to the public), or whether the parcel has particular recognised landscape or biodiversity value were identified in the parcel assessments.

Purpose 4: To preserve the setting and special character of historic towns

- 3.24 There are no nationally recognised historic towns in the borough. However, Reigate town centre has historic qualities, and is covered almost wholly by a Conservation Area. As such, it is arguably the asset to which the greatest level of protection ought to be provided under this purpose.
- 3.25 As part of the assessment of individual parcels, a number of other heritage assets were considered to be important in terms of maintaining historic setting, including other Conservation Areas and designated Historic Parks. However, given these do not strictly comply with the definition of “historic towns” as set out in the NPPF, the ratings afforded to parcels were moderated to reflect their lesser importance. Whilst more subjective than other measurable criteria, the principles of assessment are set out in the Table 4 below.
- 3.26 Settings were not identified around listed buildings (or even clusters of listed buildings). This is because, in general, the setting of a listed building is relatively localised rather than of “landscape scale” such that it would impact on the entirety of a parcel. For this reason it can be more adequately managed through a conventional development management approach. In

addition, the setting of heritage assets has been considered through wider appraisal work carried out for potential urban extension sites.

Table 4: Decision aiding criteria for Purpose 4

Appraisal considerations	Decision-aiding principles	Indicative Rating
Is the open nature of the parcel an important part of the wider setting of the heritage asset?	What role does the parcel play in conserving heritage setting or historic character?	<i>Integral</i> – the openness and character of the parcel is clearly related – and contributes significantly – to the setting of Reigate town
Is there a visual or physical link between the parcel and the heritage asset?		<i>Partial</i> – the openness and character of the parcel contributes to some extent to the setting of Reigate town or contributes significantly to the setting of other assets
		<i>Limited</i> – the parcel plays little or no role in conserving historic character or setting
		Higher importance to Green Belt
		Lower importance to Green Belt

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 3.27 As stated above with regard to the strategic Green Belt review carried out as part of the original Sustainable Urban Extensions study, Purpose 5 is associated with the general principle of an “urban areas first” approach.
- 3.28 Whilst the Council has several identified regeneration areas, the Core Strategy sets out an explicit hierarchical approach to land allocation which prioritises opportunities in regeneration areas (and generally within the wider urban area) in advance of development within the Green Belt as part of urban extensions. It also sets out that the latter will only be released in the event that the Council’s land supply falls below the required five years meaning that – in effect – Green Belt land will only come forward once development opportunities in these regeneration areas and the wider urban area have been exhausted or are not in a position to contribute to supply.
- 3.29 Given this strategy, it was concluded through the Core Strategy examination that notwithstanding an ‘urban areas first approach’ consideration needs to be given to the release of Green Belt to accommodate future housing growth. As a result, all parcels are assessed as having low importance against this purpose. The Council will however continue to ensure that if and when Green Belt land is removed (via the plan making process) and subsequently released for development, it is done so in a way which complements developments and projects being brought forward in regeneration areas.

Table 5: Decision aiding criteria for Purpose 5

Appraisal considerations	Decision-aiding principles	Indicative Rating
Would releasing a parcel of land directly or indirectly divert development interest away from urban regeneration opportunities or compromise their viability?	As discussed above – Core Strategy “urban areas first” approach ensures that development on greenfield, Green Belt sites should not directly compete with viable urban/regeneration opportunities.	Lower importance to Green Belt

Task 3: Determining an overall priority for protection

- 3.30 The detailed analysis in Task 2 enabled specific conclusions to be drawn on the contribution made by the identified land parcels to each of the individual purposes of the Green Belt.
- 3.31 In order to inform the identification of land parcels that may potentially be suitable for development, it is necessary to draw these individual assessments into an overarching conclusion as to the importance and value of each particular parcel to the purposes and integrity of the Green Belt and, as a consequence, the degree of harm which would arise should it be released.
- 3.32 For the purposes of this study, the 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. These overall scores have then been presented in Tables 6 and 7 overleaf in the form of a prioritisation with those land parcels assessed as having a greater cumulative contribution to the purposes of the Green Belt being identified as a higher priority for protection. Choropleth maps showing the location and priority of the parcels have also been provided.
- 3.33 Detailed assessments for each of the parcels are included at Appendix 1.

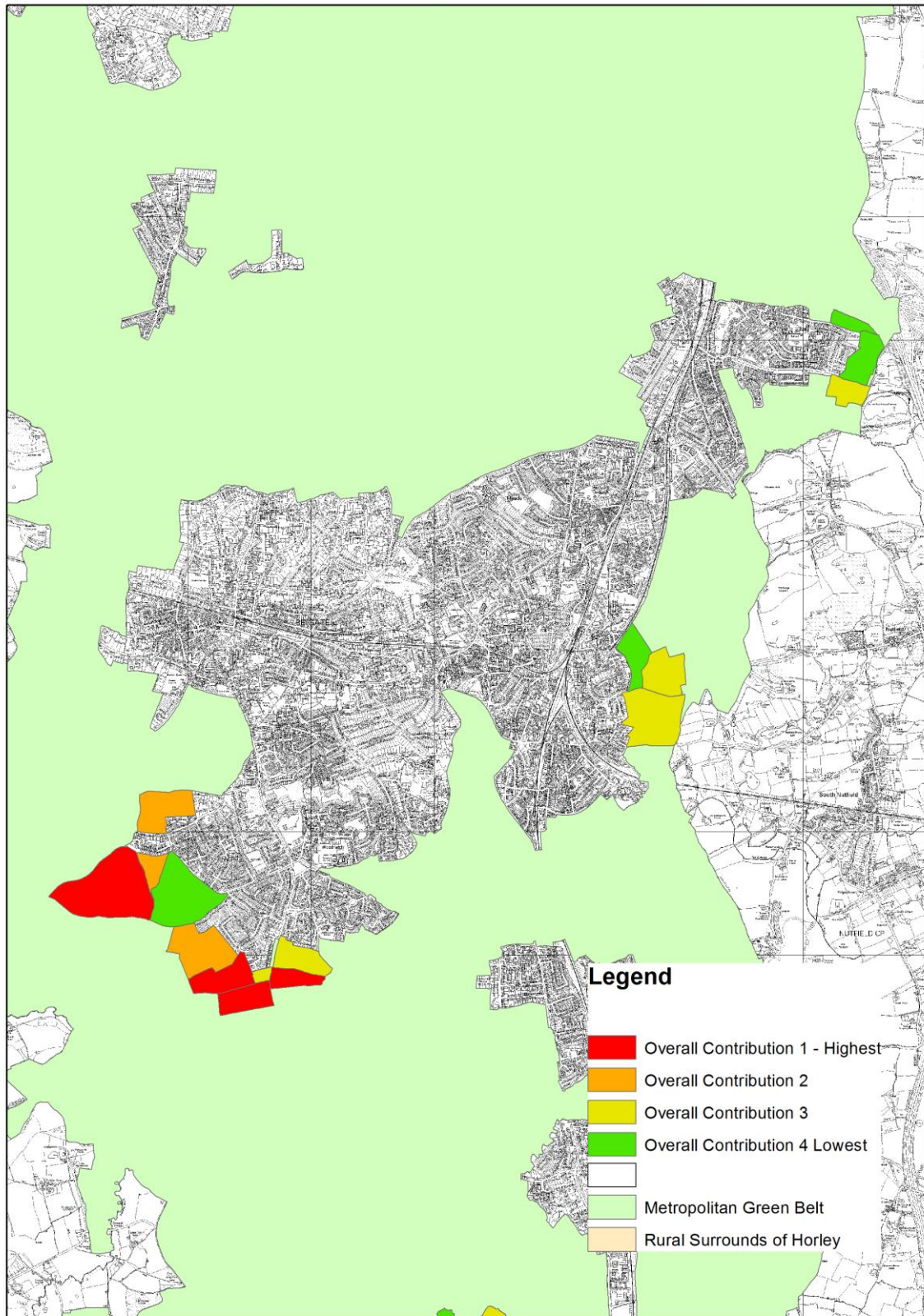
Table 6: Summary of assessments and overall priority for continued Green Belt protection (East Redhill, East Merstham and South West Reigate)

Broad Area	Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5	Priority for protection
East Redhill	ERM2 – Paddock north of Nutfield Road	Lower	Lower	Moderate	Lower	Lower	4 - lowest
East Merstham	ERM5 – Oakley Farm	Lower	Lower	Moderate	Lower	Lower	
East Merstham	ERM6 – Land north east of Merstham	Lower	Lower	Moderate	Lower	Lower	
South West Reigate	SSW2 – Land at Sandcross Lane	Lower	Lower	Moderate	Lower	Lower	
East Redhill	ERM1 – Hillsbrow	Lower	Moderate	Moderate	Lower	Lower	3
East Redhill	ERM3 – Former Copyhold Works	Moderate	Moderate	Lower	Lower	Lower	
East Merstham	ERM4 – Land south of Bletchingley Road	Moderate	Lower	Moderate	Lower	Lower	
South West Reigate	SSW7 – Hartswood Nursery and surrounds	Moderate	Lower	Moderate	Lower	Lower	
South West Reigate	SSW9 – Land at Dovers Farm	Moderate	Lower	Moderate	Lower	Lower	2
South West Reigate	SSW5 – Land south of Slipshatch Road	Moderate	Lower	Higher	Lower	Lower	
South West Reigate	SSW1 – Shepherds Lodge Farm	Lower	Lower	Higher	Moderate	Lower	
South West Reigate	SSW3 – King George's Field	Moderate	Lower	Higher	Lower	Lower	
South West Reigate	SSW6 – Land west of Castle Drive	Higher	Lower	Higher	Lower	Lower	1 - highest
South West Reigate	SSW6A – Land West of Castle Drive	Higher	Lower	Higher	Lower	Lower	
South West Reigate	SSW4 – Land at Clayhall Lane	Higher	Lower	Higher	Lower	Lower	
South West Reigate	SSW8 – Land west of Dovers Green Road	Higher	Lower	Higher	Lower	Lower	
South West Reigate	SSW10 – Land east of Dovers Green Road	Higher	Lower	Higher	Lower	Lower	
South West Reigate	SSW10 – Land east of Dovers Green Road	Higher	Lower	Higher	Lower	Lower	

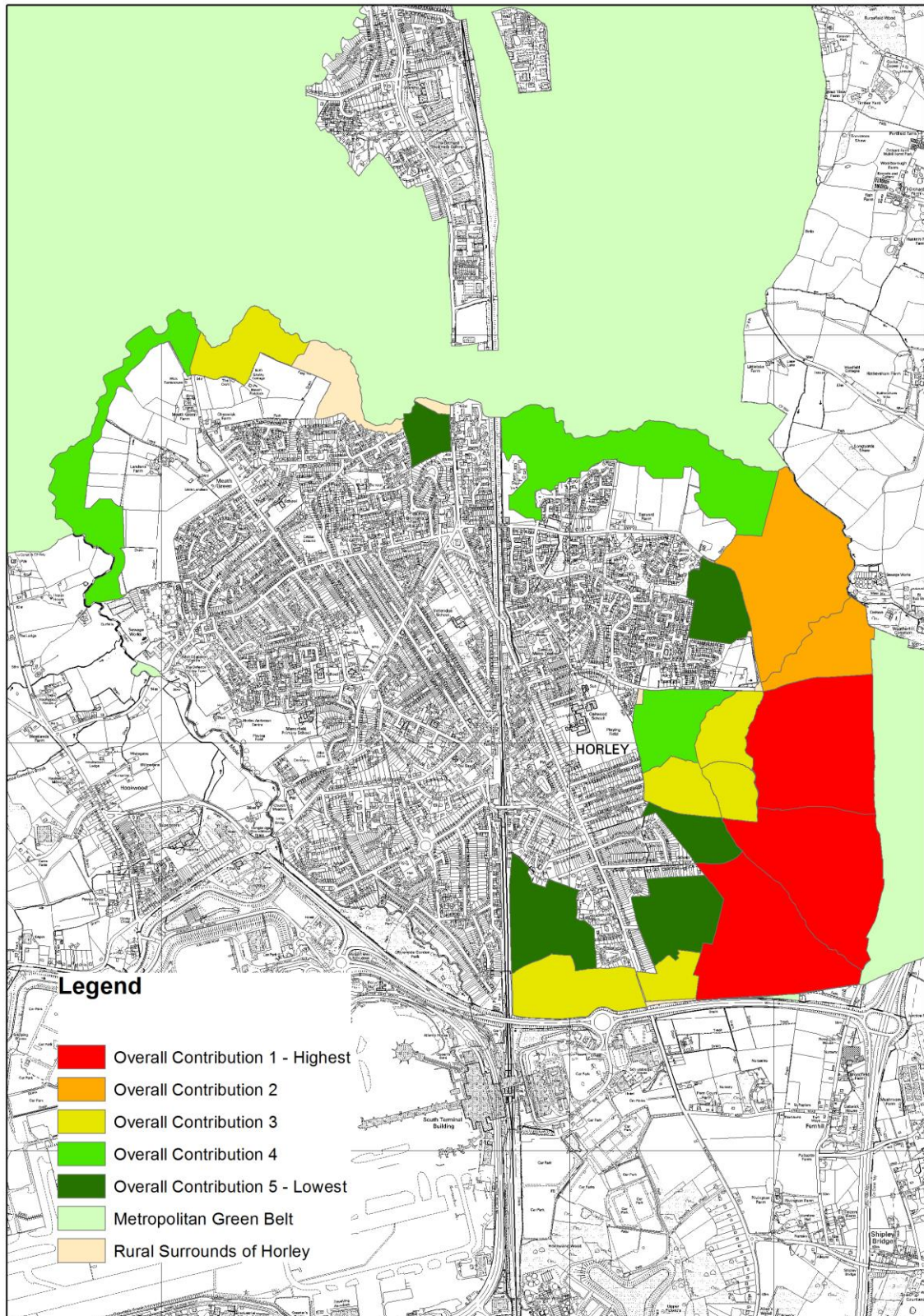
Table 7: Summary of assessments and overall contribution to purposes of the Green Belt (Horley surrounds – not currently Green Belt)

Broad Area	Land Parcel	Purpose 1	Purpose 2	Purpose 3	Purpose 4	Purpose 5	Overall contribution
Horley surrounds	EH1 – Langshott Wood	Lower	Lower	Moderate	Lower	Lower	5 - lowest
Horley surrounds	NWH2 – Land at Bonehurst Road	Lower	Lower	Moderate	Lower	Lower	
Horley surrounds	SEH1 – Land south of Limes Avenue	Lower	Lower	Moderate	Lower	Lower	
Horley surrounds	SEH4 – Land at The Close	Moderate	Lower	Lower	Lower	Lower	
Horley surrounds	SEH6 – Land at Newstead Hall	Lower	Lower	Moderate	Lower	Lower	
Horley surrounds	SEH7 – Land at Wilgers Farm	Lower	Lower	Higher	Lower	Lower	4
Horley surrounds	NEH1 – North East Sector RGC	Lower	Lower	Higher	Lower	Lower	
Horley surrounds	NWH3 – North West Sector RGC	Lower	Lower	Higher	Lower	Lower	
Horley surrounds	NWH1 – Land at Meath Green Lane	Lower	Moderate	Higher	Lower	Lower	3
Horley surrounds	SEH2 – Land west of Balcombe Road	Lower	Higher	Moderate	Lower	Lower	
Horley surrounds	SEH3 – Land east of Balcombe Road	Moderate	Higher	Lower	Lower	Lower	
Horley surrounds	SEH8 – Land at Farney View Farm	Moderate	Lower	Higher	Lower	Lower	
Horley surrounds	SEH10 – Land east of Farney View Farm	Moderate	Moderate	Moderate	Lower	Lower	
Horley surrounds	SEH9 – Land east of Wilgers Farm	Moderate	Lower	Higher	Lower	Lower	2
Horley Surrounds	EH2 – Brook Wood	Moderate	Higher	Moderate	Lower	Lower	
Horley surrounds	EH3 – Land north of Smallfield Road	Moderate	Higher	Moderate	Lower	Lower	1 – highest
Horley surrounds	SEH5 – Land west of Burstow Stream	Higher	Moderate	Higher	Lower	Lower	
Horley surrounds	SEH11 – Land at Harrowsley Green Farm	Moderate	Higher	Higher	Lower	Lower	
Horley surrounds	SEH12 – Land south of Haroldslea Drive	Moderate	Higher	Higher	Lower	Lower	

Overall contribution to the purposes of the green belt - Redhill, Merstham, Reigate



Overall contribution to the purposes of the green belt - Horley



4. Part 2: Review of minor boundary anomalies

Overview

- 4.1 The primary purpose of Part 2 of the study is to identify where minor anomalies exist in the borough’s Green Belt boundaries and recommend amendments which would address these anomalies. This is to ensure that, at the localised level, the Green Belt boundary is as far as possible aligned with strong features and therefore likely to be more robust in the long-term.
- 4.2 It is not the purpose of this part of the study to identify opportunities – however small – for development on the edge of the urban area.
- 4.3 There are a variety of reasons why a minor change/amendment to the Green Belt boundary could be necessary. This includes:
- Consistency: to ensure that particular sites, or types of sites (mainly those with built development), which are contiguous with the urban area, are treated consistently or, if not, that there are robust reasons to treat them variably.
 - Digitising errors: the advent of digital mapping and digital/aerial photography since the Green Belt was originally transcribed has, in some places, led to minor anomalies where boundaries do not correctly follow physical features or cut through plots of land and even through buildings.
 - Reflect current conditions: in some instances, the circumstances of a specific site have changed since the Green Belt was originally drawn up which warrant a revision to boundaries. This could include instances where new development has been built which crosses the Green Belt boundary or where development has occurred adjacent to the boundary which is so similar in character to the adjoining urban area that the difference in status cannot be justified.

Methodology

Policy Principles	
NPPF	When defining boundaries, local planning authorities should...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent
Core Strategy Policy CS3	The Council will undertake a Green Belt review...this review will include...addressing existing boundary anomalies throughout the borough.

Assessment Principles

- 4.4 The guiding principle for this part of the study is to ensure that, throughout the borough and at a localised level, boundaries are as clearly defined as practicable and serve to reinforce the permanence of the Green Belt.
- 4.5 Four assessment principles were developed to ensure that a transparent and consistent approach was taken to the identification of anomalies and the recommendation of amendments:
1. Where a strong feature (as defined in Table 1 above) forms the current Green Belt boundary, and the density/grain of development within this boundary is markedly more urban (e.g. higher/tighter) than in the Green Belt, the existing boundary should remain as is.
 2. Where land currently in the Green Belt is developed at a similar density/grain to the adjacent urban area, it should be incorporated within the urban area – unless it would cross a strong boundary or result in a ribbon of development.
 3. Where the existing boundary appears to be incorrect or inaccurate due to either the scale it was drawn at, or as a result of a digitising error, then the boundary should be realigned logically. Wherever possible, this should be to a strong feature.
 4. Where development has occurred since the Green Belt boundary was drawn and the development crosses or leads to the boundary being otherwise inappropriate, then the boundary should be aligned to the built settlement edge or other strong boundary feature.

Identification of Potential Anomalies and Assessment Procedure

- 4.6 Firstly, a detailed desk based review was carried out to identify potential small-scale boundary anomalies. This primarily involved studying digital Ordnance Survey Master Map combined with aerial/birds eye photography (from 2012). Discussions were also held with the Council's Development Management and Planning Enforcement teams to establish whether officers had encountered, or been made aware of, any potential anomalies through the course of their work. In total, 45 anomalies were identified through this process.
- 4.7 All potential anomalies were brought forward for assessment by an internal review panel comprised of officers from policy, development management and enforcement. In each case, the panel considered the possible reasons as to why the anomaly had occurred, reviewed any relevant planning history and developments and ultimately assessed whether a change was or was not required in accordance with the principles above.
- 4.8 Where it was felt a robust conclusion could not be made on the basis of digital photography/mapping or where a change in the boundary was proposed, site visits were carried out to verify the situation. During these visits, visual and written records were made of the type, scale and character of any relevant land uses and the apparent strength of any existing or potential boundaries. A further review panel was convened to consider this on-site evidence and draw a conclusion.

Summary of Assessments

- 4.9 Table 8 below summarises the overall conclusions of the review panel in respect of each of the anomalies identified. Mapping for each of the anomalies assessed is contained in Appendix 2.
- 4.10 It is recommended that the changes proposed as a result of the assessments are consulted upon as part of the Regulation 18 DMP consultation and consideration be given to their incorporation on the Policies Map.

Table 8: Commentary and conclusions for identified anomalies

Ref.	Location Description	Comments and Conclusion
1	Monfort Rise, Salfords	Single dwelling included within Green Belt, the character of which is not demonstrably different in character/density than the adjoining residential area. Change to include single property within urban area.
2	Lodge Lane, Salfords	Boundary illogical dissects residential curtilage. Change to align with property boundaries.
3	West Avenue/Horley Road, Earlswood	Area of amenity land is demonstrably different in character to the adjoining urban area and transitions to the GB. Boundary is however illogical in places as follows common land boundary and not physical features. Change to align with road (West Avenue).
4	South of Copsleigh Avenue, Earlswood	Drafting error as boundary misaligned with residential curtilages/settlement edge. Change to align with settlement edge.
5	Maple Road/Woodhatch Road, Earlswood	Area of amenity land is demonstrably different in character to the adjoining urban area and transitions to the GB. Whilst could be realigned to roads, the existing settlement edge is well established and a strong feature. No rationale for change.
6	Three Arch Road, Earlswood	Area of amenity land is demonstrably different in character to the adjoining urban area and transitions to the GB. Whilst could be realigned to roads, the existing settlement edge is well established and a strong feature. No rationale for change.
7	Oaklands Drive, Earlswood	Housing estate built since original GB boundary defined (early 2000s). Density and grain of development similar to adjoining residential area and large area of open land is illogically excluded from GB. Although urban edge is not well defined in some places, rationale still exists to draw tightly along the extent of built form. Change to align with extent of built form/settlement edge.
8	Brambletye Park Road, Earlswood	Boundary illogically dissects outbuildings and hard landscaped play area of school, all of which are materially urban in character. Change to align with extent of built complex of school.
9	Nuthatch Gardens, Reigate	Drafting error as boundary misaligned with

		residential curtilage/settlement edge. Change to align with settlement edge.
10	Dovers Green Road, Reigate	Housing development built since original GB boundary defined (2013/14). Density and grain of development similar to adjoining residential area. Change to align with extent of built form/settlement edge.
11	Dovers Green Road , Reigate	Area of amenity land is demonstrably different in character to the adjoining urban area and transitions to the GB. Boundary is however illogical in places as follows common land boundary and not physical features. Change to align with access road adjacent to Dovers Green Road.
12	Park Lane, Reigate	Although single dwelling included within Green Belt, plot is significantly more open than adjoining residential enclave. No rationale for change.
13	Colley Lane, Reigate	Drafting error as boundary inconsistently follows curtilages and road. Change to consistently follow road.
14	Coppice Lane, Reigate	Drafting error as boundary inconsistently follows curtilages and road. Change to consistently follow road.
15	Gatton Road, Reigate	Drafting error as boundary inconsistently follows curtilages and road. Change to consistently follow road.
16	Frenches Road, Redhill	Terraces of houses built since original GB boundary defined (mid 2000s). Density and grain of development distinctly urban and akin to the adjoining residential area. Change to align with settlement edge/roads which bound the development.
17	Southern boundary of Watercolour development	Housing estate built since original GB boundary defined (mid/late 2000s). As estate has development, boundary originally defined has become inconsistent and inaccurate. Change to align with extent of built form/settlement edge.
18	Battlebridge Lane/London Road, Redhill	Boundary illogical as dissects commercial properties on adjoining industrial estate. Change to align with boundary of industrial estate.
19	Oakley Site, Radstock Way, Merstham	Boundary illogical dissects outbuildings forming part of the Oakley complex. Change to align with boundary of built complex.
20	Smithy Lane, Lower Kingswood	Boundary illogical as dissects residential curtilages. Change to align with property boundaries.
21	Green Lane, Lower Kingswood	Boundary dissects residential curtilages; however, forms a consistent and coherent boundary line. No rationale for change.
22	Orchard Way, Lower Kingswood	Boundary illogical as dissects residential curtilages. Change to align with property boundaries.
23	Mogador Road, Lower Kingswood	Drafting error as boundary misaligned with residential curtilage/settlement edge. Change to align with settlement edge.
24	Petrol Station, Brighton Road,	Although a somewhat urban feature, the existing

	Lower Kingswood	GB boundary (aligned to the settlement edge) is more clearly defined. No rationale for change.
25	Greenacres, Lower Kingswood	Small housing estate built since original GB boundary defined (early 2000s). Density and grain of development similar to adjoining residential. Change to align with extent of built form/settlement edge.
26	R/O The Glade, Kingswood	Area of woodland to the rear of residential properties is open in character and transitions to the GB. Boundary inconsistently follows residential curtilages and dissects areas of woodland. Change to align with settlement edge/residential curtilages.
27	Legal & General, Furze Hill, Kingswood	Boundary arbitrarily dissects and inconsistently treats the curtilage of the site (car parking areas). Change to align with edge of residential settlement and roads.
28	Withybed Corner, Walton on the Hill	Boundary illogical as dissects residential curtilage leaving built form in the Green Belt. Actual boundary of curtilage is strongly defined by trees so positive benefit from alteration. Change to align with property boundary to north/tree belt.
29	Walton Street/Ebbisham Lane, Walton on the Hill	Although single dwelling included within Green Belt, plot is significantly larger and more open than adjoining properties with no natural strong boundary with which to realign. No rationale for change.
30	Howard Close, Walton on the Hill	Area of amenity space is open in character and boundary already aligned with strong feature in form of estate road. No rationale for change.
31	Mere Pond, Walton on the Hill	Pond is open in character and transitions to the GB. Whilst could be realigned to roads, the existing settlement edge is well established and a strong feature. No rationale for change.
32	Brighton Road, Burgh Heath	Although single dwelling included within Green Belt, plot is significantly more open than adjoining residential area. No rationale for change.
33	Can Hatch, Burgh Heath	Although development has occurred since the GB boundary was original defined (early 2000s), density of the three properties is materially different to adjoining residential area and significantly more open. No rationale for change.
34	Wellesford Close, Banstead	Boundary illogical as dissects residential curtilages. Change to align with property boundaries.
35	Holly Hill Park, Banstead	Drafting error as boundary cuts through residential curtilage. Change to align with property boundary
36	Chatsworth Park, Holly Lane, Banstead	Although development has occurred since the GB boundary was original defined (early 2000s), density is materially different to adjoining urban area and significantly more open. No rationale for change.
37	Winkworth Road/Bolters Lane, Banstead	Area of woodland/amenity land is open in character. Whilst could be realigned to roads, the existing settlement edge is well established

		and a strong feature. No rationale for change.
38	A217/Winkworth Road, Banstead	Area of woodland is open in character and transitions to the GB. Whilst could be realigned to roads, the existing settlement edge is well established and a strong feature. No rationale for change.
39	Osier Way, Banstead	Boundary cuts through properties arbitrarily on residential estate built since original GB defined (mid 1980s). Change to align with outer estate road.
40	Tattenham Crescent, Epsom Downs	Boundary illogically dissects curtilage of commercial premises. Change to align with extent of commercial forecourt.
41	Coulsdon Lane, Chipstead	Boundary illogical as dissects residential curtilages. Change to align with property boundaries.
42	R/O Chipstead Way, Chipstead	Boundary considered to have been drawn logically; however, gardens appear to have been informally extended into GB in interim. No rationale for change.
43	Beckenshaw Gardens, Woodmansterne	Drafting error as boundary cuts through residential curtilage. Change to align with property boundary.
44	Kenneth Road, Woodmansterne	Drafting error as boundary cuts through residential curtilage. Change to align with property boundary.
45	Queens Close, Walton on the Hill	Recent flatted development built since original GB boundary defined (2013/14). Density and grain of development similar to adjoining residential area. Very strong tree boundary around residential development. Change to align with extent of developed site formed by tree boundary.
46	Dorking Road, Tadworth	Small area of woodland/pond adjacent to settlement edge is consistent in character to adjoining land which is in Green Belt. Boundary currently defined by private residential access track and could be strengthened by aligning with established settlement edge. Change to align with settlement edge/residential curtilages.

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

Overview

- 5.1 The primary purpose of Part 3 of the study is to review villages, settlements and large developments to establish whether the current approach to inseting these within the Green Belt, or washing these over with Green Belt designation, remains appropriate (Policy CS3 4c).

Methodology

Identifying areas for review

Policy Principles	
NPPF	<p>When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. (para 84)</p> <p>If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt. (para 86)</p>
Core Strategy Policy CS3	The Council will undertake a Green Belt review...this review will include...reviewing washed over villages and areas of land inset within or currently beyond the Green Belt throughout the borough.

- 5.2 A desk-based review of digital mapping and aerial photography was carried out in order to identify areas for consideration under this part of the study. In the first instance, it was decided to identify all “clusters” or “concentrations” of homes and other facilities within the borough’s Green Belt.
- 5.3 In the context of East Surrey, the urban form of Reigate & Banstead is somewhat unique in the scale of its settlements, with predominantly larger built up areas and very few small scale rural villages or clusters within the borough. Unlike surrounding districts where washed over rural villages are common, practically all of the borough’s settlements and villages are therefore already inset within the Green Belt and designated as urban area.
- 5.4 There are therefore very few areas within the borough which could fall to be reviewed in this part of the study: in total only three areas were initially identified:
- Netherne-on-the-Hill

- Royal Earlswood
- Sidlow

- 5.5 In addition to these areas currently within the Green Belt, the only existing area of the borough currently inset within the Green Belt – Babylon Lane – was also considered against the characteristics above to assess whether the inseting remains appropriate, justified and robust in the context of the NPPF.
- 5.6 A number of functional and physical characteristics were used to determine whether the areas identified could be classified as a “village” or independent settlement area in their own right and therefore whether they should be assessed for potential removal from/insetting within the Green Belt:
1. Critical Mass: Is the concentration of sufficient “critical mass” (number of homes/land area)?
 2. Identity: Does the area have a separate physical or community identity and a distinct character compared to the surrounding main urban area?
 3. Independence: Is the area served by its own services and facilities such that can function independently from surrounding urban settlements?
- 5.7 The areas identified were then categorised according to the extent to which they met the characteristics above using the following approach:
- Green: the area clearly meets the characteristic
 - Amber: the area displays some aspects of the characteristic and/or displays the characteristic less clearly
 - Red: the area does not meet the characteristic
- 5.8 These ratings against the individual characteristics were the combined into an overall conclusion as to whether the area constituted a village/independent settlement area or not.

Table 9: Assessment of physical and functional characteristics

Area	Characteristics	Comments	Overall conclusion
Netherne-on-the-Hill	<i>Critical mass</i>	Approximately 580 dwellings over an area of 26 hectares.	Area is of sufficient scale, distinct identity and has a reasonable degree of physical/functional independence. It is therefore considered to be a village in its own right
	<i>Identity</i>	Physically separated from Coulsdon/Hooley; distinct character in terms of dwelling mix, style, village green. Active independent residents association with “village plan”.	
	<i>Independence</i>	Own village shop, recreational and leisure facilities.	
Royal Earlswood	<i>Critical mass</i>	Approximately 390 dwellings over an area of 17 hectares.	Area is of sufficient scale to form a separate settlement area and has a degree of distinct identity but is functionally reliant on nearby Earlswood and Redhill in terms of services. It is
	<i>Identity</i>	Close related in physical terms to Earlswood: reads as part of wider suburb. Some distinctiveness in character owing to heritage. Independent residents association.	

	<i>Independence</i>	Own small scale leisure facilities but no other services/shops. Wholly reliant on neighbouring Redhill and Earlswood.	therefore not considered to be a village in its own right
Sidlow	<i>Critical mass</i>	Only 21 dwellings over an area of approximately 5 hectares.	The area is very small scale and whilst it has a distinct semi-rural character, it is dependent upon neighbouring urban areas (Reigate/Woodhatch) for services and facilities. It is therefore not considered to be a village in its own right
	<i>Identity</i>	Physically separated from Reigate. Distinct semi-rural/rural character. Covered by wider parish council.	
	<i>Independence</i>	Own church but no other facilities (e.g. shop etc.). Wholly reliant on neighbouring Reigate.	
Babylon Lane	<i>Critical mass</i>	Only 21 dwellings over an area of approximately 5 hectares.	The area is very small scale and whilst it has a distinct semi-rural character, it is wholly residential and dependent upon neighbouring urban areas (Kingswood) for services and facilities. It is therefore not considered to be a village in its own right
	<i>Identity</i>	Physically separated from Lower Kingswood. Distinct semi-rural/rural character but part of the wider community of Kingswood/Lower Kingswood.	
	<i>Independence</i>	No facilities of its own, purely a residential area. Wholly reliant on neighbouring Lower Kingswood.	

- 5.9 Based on this assessment above, it was considered that only Netherne-on-the-Hill exhibited characteristics consistent with a village or independent settlement. This area was therefore carried forward to the need stage of the assessment to determine whether – from the perspective of the Green Belt - it would be appropriate for in-setting.
- 5.10 Whilst Babylon Lane was considered not to be a village/settlement area in its own right, as it is currently inset within the Green Belt, it was also taken forward to the next stage to ensure that it would not be incongruous with, or harmful to, the wider Green Belt if a decision were taken to put in back the Green Belt.

Review of inseting and washing over

- 5.11 The NPPF sets out the basic principle which should be applied in determining whether areas should be washed over by, or inset within the Green Belt. In simple terms, this entails an assessment of the character and openness of the area and the extent to which it relates to the wider Green Belt.
- 5.12 A series of key factors and decision-aiding criteria were developed in order to assess these NPPF principles: these are discussed in more detail below in Table 10. Some of the identified criteria are “measurable”; however, these were also supplemented by a qualitative analysis in recognition of the fact that certain characteristics of character may not be captured in a purely quantitative assessment.

Table 10: Key factors and decision-aiding principles for settlement openness

Factor	Decision-aiding criteria	Indicative rating
Density	<i>Very low</i> – development within the identified area occurs at less than 10dph	Higher contribution to openness of Green Belt
	<i>Low</i> – development within the identified area occurs at between 10 and 20dph	
	<i>Medium</i> – development within the identified area occurs at more than 20dph	Lower contribution to openness of Green Belt
Compactness	<i>Dispersed</i> – Building separation is often wide (i.e. greater than 5m). Breaks in the built form are a common feature and are generally larger in size.	Higher contribution to openness of Green Belt
	<i>Moderate</i> – some open spaces and undeveloped areas exist, some of which are larger in size. Reasonable separation exists at the boundaries between dwellings (i.e. between 2m and 5m).	
	<i>Compact</i> – open spaces, undeveloped plots and breaks in the built form are infrequent. Building separation is generally narrow (i.e. less than 2m).	Lower contribution to openness of Green Belt
Building scale/massing	<i>Light</i> – buildings are almost exclusively two storeys or less (more than 75%). Detached and semi-detached buildings predominate and dense terraces or blocks of built form are infrequent or non-existent.	Higher contribution to openness of Green Belt
	<i>Moderate</i> – buildings are mainly two storeys or under (more than 50%). Dense terraces or blocks exist but are not dominant.	
	<i>Heavy</i> – buildings in excess of two storeys are common (more than 50%). Dense building forms (e.g. flats/terraces) are frequent and characteristic of the area.	Lower contribution to openness of Green Belt
Boundaries and visual permeability	<i>Open</i> – outer boundaries are generally exposed with built form open to the wider countryside. Where they exist, boundary features are intermittent, small-scale and typically natural (hedging, trees etc.). Intervisibility with the wider countryside.	Higher contribution to openness of Green Belt
	<i>Mixed</i> – a mix of formal enclosure and more exposed boundaries exist within the area. Some views and vistas to the wider countryside from within the area are possible.	
	<i>Closed</i> – outer boundaries are predominantly formed by dense, visually prominent or “urban” boundary features (such as dense trees). Potential for views and vistas between and through the area to the wider countryside are limited.	Lower contribution to openness of Green Belt

Summary of Assessments

- 5.13 The table below summarises the assessment against the different factors for each of the two areas reviewed and provides an overall conclusion as to their overall openness and contribution to the wider Green Belt. More detailed commentary and imagery/mapping for each of the two areas assessed is contained in Appendix 3.
- 5.14 For the purposes of this study, the 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). No weighting is applied and the combined thresholds are: High: 10+, Moderate: 8 to 10; Low: 4 to 7.

Table 11: Summary of assessments and overall contribution to purposes of the Green Belt (washed over land and insets)

Broad Area	Factor 1	Factor 2	Factor 3	Factor 4	Overall conclusion
Netherne-on-the-Hill	Lower	Moderate	Moderate	Moderate	<i>Low contribution to Green Belt openness</i>
Babylon Lane	Higher	Moderate	Higher	Higher	<i>High contribution to Green Belt openness</i>

- 5.15 Based on the assessments, it is concluded that Netherne-on-the Hill – as defined by the boundary in Appendix 3 – makes a low contribution to Green Belt openness. As such, consideration should be given to excluding the area from the Green Belt (i.e. that it be inset).
- 5.16 Conversely, the Babylon Lane area – which is currently inset within the Green Belt in the 2005 Borough Local Plan – is not considered to meet the essential characteristics of a village or settlement area in its own right. In addition, the nature and character of the area is such that it makes a high contribution to Green Belt openness and should therefore be considered for inclusion within the Green Belt (i.e. washing over).
- 5.17 These proposed changes were consulted upon as part of the Regulation 18 DMP consultation, and the few comments received on this topic were considered against the evidence base – however, no changes to the final recommendations are considered necessary.

6. Part 4: Exceptional Circumstances for Altering the Green Belt

Policy Context

- 6.1. This section considers the use of the phrase ‘exceptional circumstances’ as this appears in national planning policy and applies to recommending alterations to the Metropolitan Green Belt in Reigate & Banstead Borough.
- 6.2. [Paragraph 82 of the NPPF](#) states that “new Green Belts should only be established in exceptional circumstances”, and that when proposing a new area of Green Belt, a local authority should:
- “Demonstrate why normal planning and development management policies would not be adequate;
 - Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
 - Show what the consequences of the proposal would be for sustainable development;
 - Demonstrate the necessity of the Green Belt and its consistency with local plans for adjoining areas; and
 - Show how the Green Belt would meet the other objectives of the Framework”
- 6.3. [Paragraph 83](#) states that “once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan”. However, no explicit definition of ‘exceptional circumstances’ is provided, nor is there an explanation of the process a local authority might go through to demonstrate exceptional circumstances (as, for example, in paragraph 82 for the establishment of new Green Belts).
- 6.4. [Paragraph 84](#) states that “when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development”.
- 6.5. [Paragraph 86](#) states that “if it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt”.
- 6.6. [Planning Practice Guidance](#) does not provide any further clarification, merely reiterating that “once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan” (Reference ID: 3-044-20141006).

- 6.7. Government has indicated that the NPPF published in 2014 will be revised in 2018, and it is unclear at present whether further clarification will be forthcoming related to the interpretation of ‘exceptional circumstances’ in Green Belts and how these may relate to other housing policy initiatives, for example Garden Communities.
- 6.8. To provide more local context and clarity, the [Reigate & Banstead Core Strategy Adopted 2014](#) provides further consideration on ‘exceptional circumstances’ to be applied to a Green Belt review and any allocation of sites through the plan making process – in this case through the Development Management Plan.
- 6.9. Policy CS3 of the Core Strategy states:
- “3. In exceptional circumstances land may be removed from the Green Belt and allocated for development through the plan making process. Exceptional circumstances may exist where both (a) and (b) apply:*
- a. There is an overriding need for the development in order to secure the delivery of the strategic objectives and policies of the Core Strategy, and either:*
- i. The development proposed cannot be accommodated on land within the existing urban area or on land which is in the countryside beyond the Green Belt; or*
- ii. The development of land within the Green Belt would represent a significantly more sustainable option than (i).*
- b. There is no or limited conflict with the purposes and integrity of the Green Belt.”*
- 6.10. Prior to adoption this policy was tested and found sound during [the inspection](#) of the Core Strategy.
- 6.11. Policy CS3 thus sets out a number of tests that must be met to justify exceptional circumstances for removing land from the Green Belt for site allocations:
- Is there an overriding need for development to secure the delivery of the Core Strategy?
 - Is it possible to accommodate that development within the existing urban area or the countryside outside the Green Belt? Or,
 - Is development on land that is currently within the Green Belt a significantly more sustainable option than development in the possible locations in the urban area or the countryside outside the Green Belt?
 - Would the removal of this area from the Green Belt seriously conflict with the purposes or integrity of the Green Belt?
- 6.12. These tests will be applied to the proposals for removing land from the Green Belt for Sustainable urban Extensions, traveller sites, and the East Surrey

Hospital site. For land which is proposed to be added to the Green Belt, the five requirements from paragraph 82 of the NPPF will be applied instead. For the alteration of Green Belt anomalies, changes to washed over villages and inset land, and the consideration of safeguarding land beyond the end of the plan period, other considerations are thought to apply, and this will be discussed in the relevant sections below.

Sustainable Urban Extensions

- 6.13. The [Sustainable Urban Extensions Stage 2 Technical Report](#) recommends that parcels ERM1, ERM2, ERM3, ERM4, ERM5, SSW2, SSW6 (partly), SSW7, SSW9, NWH1, NWH2, and SEH4 be considered for allocation as Sustainable Urban Extensions. All of these apart from NWH1, NWH2, and SEH4 are located within the Green Belt. This section will consider the case for exceptional circumstances for removing these parcels of land from the Green Belt.

Is there an overriding need for development?

- 6.14. During the [Core Strategy examination](#), the Inspector accepted a housing target for Reigate & Banstead Borough Council of 460 dwellings per annum during the plan period, for a total of 6,900 new dwellings by 2027. This target is notably below the objectively assessed need of 600-640 dwellings per annum (a total of 9,000-9,600 new dwellings by 2027). However, the Inspector accepted that this was “the most sustainable level of provision that can be achieved having regard to the environmental constraints, capacity considerations and deliverability issues which face the borough” (para 32).
- 6.15. [Core Strategy](#) policy CS4 identifies how land in the borough should be prioritised for housing delivery. Housing delivery should be focused first on the priority locations for growth and regeneration – Redhill and Horley town centres, the Preston and Merstham regeneration areas, and the Horley North East and North West sector developments. Beyond this, the priority should be on the built-up areas of Redhill, Reigate, Horley, and Banstead, focusing first on town centres, then edge of centre locations within walking distance of the town centres, and the on other sustainable sites within these urban areas.
- 6.16. The [2016 Strategic Housing Land Availability Assessment Addendum](#) identified that, as of March 2016, 1,857 of the required housing units had been built. It identified opportunities to build another 2,533 on specific sites between April 2016 and March 2021. This leaves a total of 2,510 dwellings required in the final six years of the plan period (April 2021-March 2027). Including an allowance for windfalls, the SHLAA Addendum could identify opportunities for only 1,879 units on specific sites, a shortfall of 631 housing units. The SHLAA Addendum then identified that the broad locations proposed for urban extensions could accommodate a total of 1,018 dwellings. The final sustainable urban extension sites proposed for allocation in the DMP are expected to provide 1,005 dwellings. This would account for the shortfall and allow for some variability in the amount of housing that comes forward on

specific sites, or the possibility of development on specific sites not eventually coming forward.

- 6.17. Essentially, while the target of 460 new dwellings per annum is already lower than the objectively assessed need for housing in the borough, it is still unlikely that the borough can meet the target without some housing development outside of the existing urban area. Without the development of urban extensions, the borough is likely to only reach around 418 dwellings per annum across the plan period – below the agreed housing target, and well below the objectively assessed need for housing.
- 6.18. It has been consistently confirmed in Duty to Cooperate discussions that adjoining boroughs and districts are unable to take any of Reigate & Banstead’s unmet housing need.
- 6.19. In addition to this, while the Council is currently meeting its affordable housing target, this target is significantly lower than the assessed need for affordable housing in the borough. Urban extensions will be expected to have a higher percentage of affordable housing than urban developments, as this will be more viable on such sites. Consequently, urban extensions will contribute to the need for affordable housing in the borough.
- 6.20. Consequently, it can be said that there is an overriding need for housing development in the borough, and for some of this development to take place outside the urban area. There is an overriding need to identify land suitable for urban extensions providing at least 631 new dwellings, and preferably somewhat more than that to account for expected developments or anticipated windfalls not materialising. This means it is possible that there are exceptional circumstances for altering the Green Belt if the other criteria are met.

Is it possible to accommodate development outside the Green Belt?

- 6.21. In Reigate & Banstead, the majority of land outside the urban area is within the Green Belt. However, around Horley there is a ring of countryside which is outside the Green Belt, and is currently designated as the Rural Surrounds of Horley. The remaining available land within the Rural Surrounds was split into 17 parcels for assessment in the [Sustainable Urban Extensions Site Specific Technical Report](#). The total size of these parcels was 271.4ha, which would be more than enough land for the required amount of housing. Therefore, it is theoretically possible to accommodate all of the needed development outside of the Green Belt. This means there are not exceptional circumstances for altering the Green Belt, unless it is clear that development within the Green Belt is a more sustainable option than development on land outside of the Green Belt.

Is development within the Green Belt a more sustainable option?

- 6.22. The entire area of the Rural Surrounds of Horley was separated into parcels and assessed for suitability in the [Sustainable Urban Extensions Site Specific](#)

[Technical Report](#). A total of 17 parcels were assessed against constraints including heritage, landscape and agriculture, biodiversity, countryside access and recreation, flood risk and water quality, and environmental health and living amenity.

- 6.23. A very large proportion of land within the Rural Surrounds of Horley is constrained, particularly by flood risk. The [Sustainable Urban Extensions Stage 1 Technical Report](#) had identified that only 46.5ha of the Rural Surrounds is not constrained by flooding, and only around 39ha of this is located adjacent to the existing urban area (with a small area not at risk of flooding isolated some distance from the existing urban area). “This falls some way short of the amount of land that would be required” (para 8.15).
- 6.24. After assessment, only 4 of the 17 parcels were found to be potentially appropriate for sustainable housing development – parcels NWH1, NWH2, SEH1, and SEH4. The remaining parcels were found to have severe constraints in terms of flood risk, air pollution, aircraft noise levels (due to the proximity of Gatwick Airport), settlement separation, woodland protection, accessibility, and their role in the strategic gap between Horley and Gatwick. This assessment is summarised in table 7 of the [Sustainable Urban Extensions Site Specific Technical Report](#). The sites that are considered sustainable for housing development make up a total of 46.8ha. However, the overall available land is reduced because site SEH1 has been identified as the most suitable allocation for a Strategic Employment Site, the need for which is discussed in [Strategic Employment Provision Opportunity Study](#). The remaining sustainable housing sites make up 31.4ha. The total available area is still further reduced because areas of these sites are located within flood zones 2 and 3, which would constrain development. The final site allocations proposed for the DMP assume that sites NWH1, NWH2, and SEH4 can provide 155 dwellings – leaving a continued shortfall of 476.
- 6.25. At the same time as assessing land parcels in the Rural Surrounds of Horley, an assessment was undertaken of land parcels in the broad areas of search within the Green Belt, as identified during the Core Strategy process – these areas are East Redhill and East Merstham, and South West Reigate. A total of 16 parcels were assessed, and 9 were found to be sustainable locations for housing development – ERM1-5, SSW2, a small part of SSW6, SSW7 and SSW9. The remaining sites would not be considered sustainable due to various matters including flood risk, loss of recreational land or sports facilities, and their location in relation to the urban area and the remainder of the Green Belt.
- 6.26. The proposed sites for allocation are close to existing settlements and road access, and the [Strategic Highway Assessment](#) has found that their development would not unduly burden the transport capacity of the borough. In the case of the sites on the former Copyhold Works and landfill, the represent a good use of previously developed land. The sites near Redhill are particularly close to the town centre, and should be accessible through sustainable modes of transport. The sites are all sequentially preferable in terms of reducing flood risk. Some mitigation measures may be needed to

deal with impacts on biodiversity, landscape, or air quality and noise pollution, but the same or greater levels of mitigation would be required on the remaining sites within the Rural Surrounds of Horley to make them fit for development.

- 6.27. Taking into account constraints that would reduce the developable area, these proposed site allocations in the DMP can provide up to 850 dwellings. It is considered that housing development on these Green Belt sites would be significantly more sustainable than development on any available sites in the Rural Surrounds of Horley except NWH1, NWH2, and SEH4. This is reflected in policy MLS1 of the DMP, which sets out the order in which urban extensions are expected to be developed – the sites in the Rural Surrounds of Horley are prioritised ahead of sites currently in the Green Belt.
- 6.28. In conclusion, although there are sites within the Rural Surrounds of Horley that would be sustainable locations for housing development, these do not amount to enough land for all of the needed development. For the remaining development, the identified sites within the Green Belt would be significantly more sustainable options. This means that there may be exceptional circumstances for altering the Green Belt, as long as the proposed changes do not seriously conflict with the purposes or integrity of the Green Belt.

Would this proposal seriously conflict with the purposes or integrity of the Green Belt?

- 6.29. Each parcel that was assessed for suitability in the Sustainable Urban Extensions report was also assessed for its contribution to the Green Belt in Part 1 of this report. Each land parcel was compared against the five purposes of the Green Belt as set out in [paragraph 80 of the NPPF](#). Based on this assessment, the sites were then ranked in terms of their priority for protection as part of the Green Belt, from 1 (highest priority for protection) to 5 (lowest priority for protection).
- 6.30. Sites ERM2, ERM5, and SSW2 were ranked at level 5, and sites ERM1, ERM3, ERM4, SSW7 and SSW9 were ranked at level 4. Site SSW6 as a whole was ranked at level 2, suggesting it is a high priority for protection due to its contribution to the purposes of the Green Belt. However, the small sub-section of the site which is proposed for removal from the Green Belt is separated from the rest of the site by a boundary of hedgerows and would essentially function as an infill for the urban area that encloses it on all sides but the west. Because of this, removal of the small sub-section of SSW6 from the Green Belt is not felt to conflict seriously with the purposes of the Green Belt.
- 6.31. An analysis of the strength of the proposed new Green Belt boundaries has been undertaken. The majority of the borders consist of strong features, with some features of moderate strength. Three small stretches of the boundary are currently considered to be formed of weak border features. Moderate and weak boundaries will be expected to be strengthened when development

takes place through measures such as additional planting or the use of strong residential curtilage boundaries.

Conclusion

6.32. In conclusion, there are exceptional circumstances for removing land from the Green Belt for the recommended urban extensions, in line with the exceptional circumstances test set in the Core Strategy.

- There is an overriding need for the development;
- The development can possibly be accommodated on land outside the Green Belt; however
- Development partially within the Green Belt would be a significantly more sustainable option than development wholly outside the Green Belt; and
- The proposed removal would not seriously conflict with the purposes or integrity of the Green Belt.

Green Belt Anomalies

6.33. During the process of reviewing the Green Belt, a number of potential anomalies were identified, as set out in Part 2 of this report. These anomalies include situations in which development has encroached into the Green Belt, situations where the Green Belt has been drawn to include areas of development at the same density as adjacent areas outside the Green Belt, and digitising errors leading to illogical boundaries that cut through plots of land or buildings.

6.34. The review of these anomalies in Part 2 analysed 46 potential anomalies, and recommended that 32 of the anomalies be changed. However, the NPPF still requires exceptional circumstances to be demonstrated to support any changes to the Green Belt, even the fixing of anomalies. The Green Belt anomalies can only be amended during the preparation of a local plan, but case law suggests that “it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary” ([Gallagher Homes Ltd v Solihull Borough Council \[2014\]](#)).

6.35. At the same time, the exceptional circumstances test laid out in the Core Strategy does not apply here, as the first three tests revolve around the need for and location of a required development – as new development is not the rationale for altering the Green Belt anomalies, these tests cannot apply here. The final test from the Core Strategy is that the proposed change does not seriously conflict with the purposes of the Green Belt, but this would be too wide-ranging a test to be applied by itself as proof of exceptional circumstances – significant changes to the Green Belt boundary could be made on this basis, as well as amendments to minor anomalies.

6.36. Consequently, it is felt that there are three grounds on which there exceptional circumstances for making these amendments to anomalies:

- 6.37. Digitising Errors: where an anomaly appears to be because of a digitising error, there is an exceptional circumstance for altering it. This includes cases where the Green Belt boundary cuts through a building, curtilage, or plot.
- 6.38. Encroachment: where development of a density/grain similar to the adjacent urban area has encroached onto the Green Belt, there is an exceptional circumstance for altering the Green Belt boundary to go around this development.
- 6.39. Weak Border Features: where a current Green Belt boundary is identified as having a weak border feature, and a minor amendment would provide it with an alternative, strong border feature, there is an exceptional circumstance for altering the Green Belt boundary. This is in line with the NPPF requirement for Green Belts to have strong and defensible boundaries that are capable of enduring in the long term.
- 6.40. In conclusion, it is believed that there are exceptional circumstances that justify the proposed amendments.

Washed Over Villages and Inset Land

- 6.42. Paragraph 86 of the NPPF states that ““if it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt”.
- 6.43. It is on the basis of this paragraph that the review of inset and washed over villages took place, and the proposed amendments are put forward. Part 3 of this report found that Babylon Lane provided a high contribution to the openness of the Green Belt due to its very low density, dispersed buildings, and open outer boundaries. It is considered necessary to prevent development in the area in order to protect the openness of the Green Belt, rather than because of the character of the area *per se*.
- 6.44. Netherne-on-the-Hill, however, was found to have a low contribution to the openness of the Green Belt due to a relatively high density, a moderate level of compactness and building scale and massing, and mixed boundaries. While development within the boundaries of Netherne should be carefully controlled, this is due to the character of the village rather than the contribution it makes to the Green Belt. This is reflected in the large conservation area, the multiple listed buildings, and the historic park/garden status that covers parts of Netherne. Development that affects the character of the Netherne should be dealt with using these designations and existing planning policies, and it is not considered appropriate for Netherne to continue to be in the Green Belt on this basis.

- 6.45. While the exceptional circumstances test set out in the Core Strategy does not apply to Netherne (because it is based primarily around the need for and location of development, and no development is being proposed in this situation), it is considered that the growth of Netherne since the 2005 BLP represents a significant change in circumstances that warrants a claim of exceptional circumstances for amending the Green Belt. Although development has taken place at Netherne over a number of years, the residential development was only substantively finished in 2008, after the 2005 BLP was adopted. The presence of large residential community in Netherne is thus a significant change in circumstances that has taken place since 2005, and represents exceptional circumstances for removing Netherne from the Green Belt in order to manage future development in line with normal planning policies, and to recognise its status as a substantial village which does not contribute to the purposes of the Green Belt any longer.

Gypsies, Travellers and Travelling Showpeople Sites

- 6.46. The [Traveller Site Land Availability Assessment](#) recommends that parcels G3, G4, G9 and G12 be considered for allocation as gypsy, traveller and travelling showpeople sites. All of these sites are located within the Green Belt. This section will consider the case for exceptional circumstances for removing these parcels of land from the Green Belt.

Is there an overriding need for development?

- 6.47. The need for pitches for gypsies, travellers, and travelling showpeople is set out in the [Gypsy and Traveller Accommodation Assessment](#), and is based on the definition of travellers set out in [Planning Policy for Travellers Sites](#). The GTAA found a need for 16 additional pitches, with the possible need for a further 8 pitches depending on gathering more information from traveller households for whom there is currently incomplete data to determine whether they meet the PPTS definition. The GTAA also found a need for 7 additional pitches for travelling showpeople. In total, the number of pitches needed in the current plan period (and up to 2031, as a fifteen year survey of need was carried out) is between 23 and 31.
- 6.48. There is an overriding need for this development, as the Council must consider the needs of these communities in developing the local plan, and the GTAA has demonstrated that the need is considerable. This means it is possible that there are exceptional circumstances for altering the Green Belt if the other criteria are met.

Is it possible to accommodate development outside the Green Belt?

- 6.49. To provide 16 pitches for gypsies, travellers, and travelling showpeople would not require large amounts of space. In terms of space, it would clearly be

technically possible to find the necessary amount of land within the urban area or the countryside outside the Green Belt. This means there are not exceptional circumstances for altering the Green Belt, unless it is clear that development within the Green Belt is a more sustainable option than development on land outside of the Green Belt.

Is development within the Green Belt a more sustainable option?

- 6.50. The process of allocating gypsy and traveller sites is discussed in more detail in the [Traveller Site Land Availability Assessment](#) (TSLAA). To determine whether development within the Green Belt is a more sustainable option than development outside the Green Belt, first the potential sites were defined, being taken from land owned by the council, sites featured in the SHLAA, responses to the Council's call for sites, extant planning permissions, and current unauthorised traveller sites. Sites that were too small to sustain a pitch were excluded, and then sites in areas of absolute constraint (within an SSSI, SAC, AONB, RASC, historic park or garden, or flood zones 2 and 3) were screened out.
- 6.51. The remaining sites were assessed for suitability, which included a consideration of social and environmental sustainability. The criteria used to determine the suitability of the sites were:
- The site can be integrated into the local area and co-exist with the local community;
 - The site has safe access to the highway and has adequate parking and turning areas;
 - The site provides a satisfactory residential environment for its intended occupiers and on-site utility services for the number of pitches proposed;
 - The site is not located in an area at high risk of flooding, including functional floodplains;
 - There is adequate local infrastructure and access to appropriate healthcare and local schools; and
 - The site does not significantly impact upon the visual amenity and character of the area or the amenity of neighbouring land uses.
- 6.52. After going through this process, only sites within the Green Belt were left. All identified potential sites outside the Green Belt were ruled out due to not meeting at least one of the suitability criteria, and therefore not representing a sustainable option for accommodating the necessary pitches. The full detail of this screening process can be found in the TSLAA.
- 6.53. Consequently, while the development could possibly be located outside the Green Belt, the proposed sites within the Green Belt are considered to be significantly more sustainable options. This means that there may be exceptional circumstances for altering the Green Belt, as long as the proposed changes do not seriously conflict with the purposes or integrity of the green

Would this proposal seriously conflict with the purposes or integrity of the Green Belt?

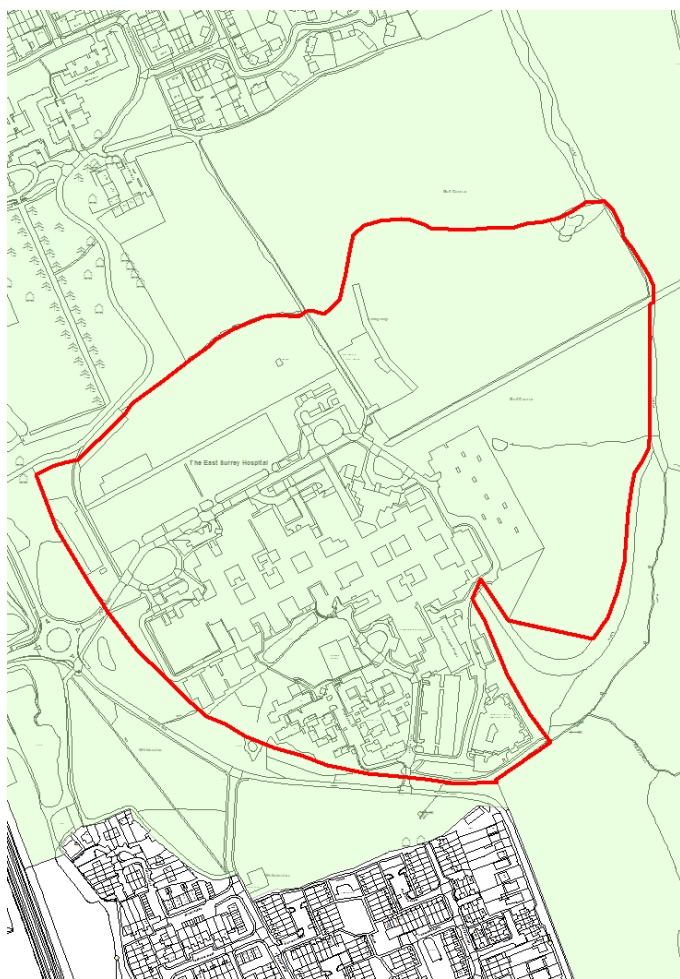
- 6.54. A Green Belt review was undertaken of all the sites that made it through the screening process – all of which are in the Green Belt. Five sites were found to be of high importance to the Green Belt, and these sites were also discounted and are not proposed for allocation. The remaining five sites were found to be of moderate importance to the Green Belt. Thus, while there is a some conflict with the purposes of the Green Belt, the proposed sites are not felt to represent a serious conflict with the purposes or integrity of the Green Belt.

Conclusion

- 6.54. In conclusion, there are exceptional circumstances for removing the proposed gypsy, traveller and travelling showpeople sites from the Green Belt, in line with the exceptional circumstances test set in the Core Strategy.
- There is an overriding need for the development;
 - The development can theoretically be accommodated on land outside the Green Belt; however
 - Development within the Green Belt would be a significantly more sustainable option than development outside the Green Belt; and
 - The proposed removal would not seriously conflict with the purposes or integrity of the Green Belt.

East Surrey Hospital

- 6.56. It is proposed that the East Surrey Hospital site and some land adjacent to it should be removed from the Green Belt to facilitate the expansion of the hospital's services. This section will consider the case for exceptional circumstances for removing these parcels of land from the Green Belt.
- 6.57. A map of the proposed Green Belt alteration is below.



Is there an overriding need for development?

- 6.58. The [Core Strategy](#) notes, in paragraph 5.5.5, that the borough contains an increasing elderly population that will need care in the future, and that there are some health problems relating to obesity in more deprived areas of the borough. It notes that “it is therefore important that the Council continues to work in partnership with service providers to ensure that these needs are met”. Policy CS5 states that the Council will “work with partners such as [...] health providers [...] to deliver improved health facilities and access to healthier lifestyles”.
- 6.59. East Surrey Hospital is the only hospital in the borough, and the only hospital within the Surrey and Sussex Healthcare NHS Trust. Demand for its services comes from across the borough, and also the areas of Crawley, south Croydon, and north-east West Sussex. Demand for the services provided by the hospital is high, and is expected to remain high. The current development proposed for the Green Belt land includes a private patients hospital, a rehabilitation centre, an outpatients centre, and MRI Centre expansion, and some residential development for key workers. The table below sets out the rise in patient numbers over the previous three years, and shows a 12.4% rise in patient numbers in just two years between 2014/15 and 2016/17.

Service Type	Patients 2016/17	Patients 2015/16	Patients 2014/15
Emergency Department Attendances	96,149	91,256	86,361
Outpatients	363,806	340,522	321,010
Emergency Admissions	34,197	34,097	32,001
Births	4,546	4,560	4,449
Elective Admissions	46,661	44,188	41,421
Total	545,359	514,623	485,242

6.60. Considering the Core Strategy's objective of working with service providers to deliver improved health facilities and ensure the health needs of the borough are met; and the rising demand for services at the hospital; it is clear that there is an overriding need for some expansion of the hospital to secure the delivery of Core Strategy policies. This means it is possible that there are exceptional circumstances for altering the Green Belt if the other criteria are met.

Is it possible to accommodate development outside the Green Belt?

6.61. To provide the necessary expansion, the hospital proposes releasing a total of 24ha of land from the Green Belt. Of this, 15.38ha are already part of the major developed site and 8.62ha would be an addition to the site (although 0.83ha of this additional land is also previously developed, as part of a golf driving range). It can therefore be assumed that 8.62ha is the minimum amount of land needed for the required expansion, although if the development took place away from the current site this may be increased due to the need for ancillary infrastructure (such as car parks, for example) – if development takes place on the existing site, this infrastructure should take up less space due to the ability to 'pool' some of the infrastructure with the existing site.

6.62. It is unlikely that a single site in the urban area could be found for redevelopment with the proposed medical facilities. The facilities could be spread across multiple sites within the urban area, although this would require the Surrey and Sussex NHS Trust to identify, purchase, and apply for planning permission for multiple sites; and would likely increase the amount of travel required between different sites. This damages both the sustainability objective of reducing the need to travel, and is likely to lead to piecemeal expansion of the hospital, and the possibility of certain required facilities not being delivered, which would affect the Core Strategy policies relating to health. It is reasonable to say that the development cannot be accommodated within the existing urban area.

6.63. There is a large amount of countryside outside the Green Belt in Horley, and this land is currently designated as the Rural Surrounds of Horley. For the purposes of the Green Belt Review and [Sustainable Urban Extensions Technical Report](#), this area was divided into parcels, many of which would be

large enough to accommodate the required amount of medical development. This means there are not exceptional circumstances for altering the Green Belt, unless it is clear that development within the Green Belt is a more sustainable option than development on land outside of the Green Belt.

Is development within the Green Belt a more sustainable option?

- 6.64. Most of the land parcels identified within the Rural Surrounds of Horley are constrained in a way which makes them unsustainable for the hospital development. Parcels SEH4, NWH1 and NWH2 have been allocated for Sustainable Urban Extensions, and parcels SEH1 and SEH2 have been allocated for a Strategic Employment Site. There is a necessity for these developments in line with the [Core Strategy](#) and the [Strategic Employment Provision Opportunity Study](#), and these are considered to be the most appropriate and sustainable parcels to use for these purposes – to use these parcels for hospital expansion instead would work against the achievement of the Core Strategy objectives and policies and would potentially lead to unsustainable outcomes as the housing or employment provision would potentially be pushed onto less sustainable land parcels.
- 6.65. Large parts of parcels SEH7 and EH2 have been designated as part of the Riverside Green Chain, one intention of which is to increase access to open space and improve health outcomes – to reverse this designation for the allocation of a hospital development would be counter-productive in terms of maximising the health outcomes of the borough. These parcels are also prone to flooding. Of the remaining parcels, all except SEH3, SEH5, and SEH11 are located almost entirely within flood zones, and a large development in these areas would run contrary to Core Strategy and DMP policies on reducing flood risk. Parcel SEH3 is entirely within the Gatwick Open Setting which aims to maintain a separation between Gatwick Airport and Horley, and is also entirely within the 57dB noise contour of Gatwick Airport – the potential health effects of regular exposure to this amount of noise would undermine the work of the hospital and the Core Strategy policies on health. The majority of parcel SEH5 suffers from the same constraints. It is for these reasons that the sites were also considered unsustainable for housing development.
- 6.66. This leaves parcel SEH11 as the most suitable of the identified parcels in the RSH, as it is relatively free from flood risk, and unconstrained by noise or landscape designations. However, the parcel is detached from the existing urban area, and development on this site would likely appear as an encroachment into the countryside in a way that development adjacent to the existing hospital would not. The parcel, along with all other parcels in the RSH, was assessed against the purposes of the Green Belt in Part 1 of this report, and was rated as the highest priority for protection. And the location of the parcel, detached from the existing urban area, means that development here would increase the need to travel (contrary to the [Sustainability Appraisal](#) framework principles), and would likely be difficult or impossible to access via public transport, putting barriers in the way of access to healthcare for residents.

- 6.67. In addition to this, the [Strategic Highway Assessment](#) undertaken as part of the DMP process has shown that the provision of the Strategic Employment Site in Horley is likely to significantly increase traffic pressure in this part of the borough. While the increase in traffic is indicated to be of a manageable level with some infrastructural improvements, the nearby development of a large, car-dependent hospital facility which will draw patients from across the borough and beyond may increase the pressure on Horley's transport infrastructure beyond what can be handled.
- 6.68. Allowing the hospital expansion to take place on the existing site and land adjoining it would appear to offer a number of sustainability benefits over the use of land within the RSH. The site in question is already owned by the NHS Trust, and would therefore provide additional certainty that the expansion can actually be delivered, contributing to the achievement of the health policies in the Core Strategy. The site is unconstrained by flood risk. The site is situated directly adjacent to an existing urban area, and is easily accessible by both car and bus, and locating additional services in the same location as the existing hospital would not increase the need to travel.
- 6.69. Consequently, while the development could possibly be located within the countryside outside the Green Belt, allowing the hospital to expand adjacent to its current site is considered to be a significantly more sustainable option. This means that there may be exceptional circumstances for altering the Green Belt, as long as the proposed changes do not seriously conflict with the purposes or integrity of the Green Belt.

Would this proposal seriously conflict with the purposes or integrity of the Green Belt?

- 6.70. The hospital site was not assessed against the purposes of the Green Belt in the first three parts of the Green Belt Review. [Paragraph 80 of the NPPF](#) sets out the five purposes of the Green Belt as follows:
- To check the unrestricted sprawl of large built up areas
 - To prevent neighbouring towns merging into one another
 - To assist in safeguarding the countryside from encroachment
 - To preserve the setting and special character of historic towns
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- 6.71. To check the unrestricted sprawl of large built up areas: The site that has been proposed for removal from the Green Belt does not adjoin the urban area, although it is close to it, and much of the land between South Earlswood and the hospital consists of road and rail infrastructure. Ultimately, the proposed site is not well contained by the urban area and would appear as something of a sprawl. However, the proposed boundaries are mostly strong, and do contain the development within the proposed area – they consist of dense lines of trees, further strengthened by the presence of public roads behind them on the western side of the site. The northern boundary of the proposed Green Belt removal is less strong, consisting of a more intermittent tree boundary. However, the land to the north of this boundary is also owned

by the NHS Trust, and has not been suggested for removal from the Green Belt in order to preserve it as an open space and a gap between the hospital and the small settlement of Royal Earlswood. The settlement edge of Royal Earlswood does provide a well-defined edge to the north of the site which would contain further sprawl.

- 6.72. To prevent neighbouring towns merging into one another: The proposed site would see new development built between the northern edge of the existing hospital and the southern edge of Royal Earlswood. This would narrow the already small gap between the hospital and Royal Earlswood, but as the hospital is not considered a town or settlement, this would not affect the Green Belt purpose. However, if the site were removed from the Green Belt, it would represent a noticeable reduction in the gap between the existing urban areas of Earlswood and South Earlswood. The current shortest distance between the edges of the two defined urban areas is 767 metres. If the hospital site were removed from the Green Belt, the gap would be reduced to 570 metres. By the criteria developed for Part 1 of this report, the gap would be considered essential, and the role of the site within the gap would be considered partial, as removal would reduce the gap between settlements by 26%.
- 6.73. However, while the site appears to therefore conflict with this purpose of the Green Belt, there are two potentially mitigating factors. The area north of the site, which forms a gap between the hospital site and the washed over settlement of Royal Earlswood, is intended to be retained as an open parkland space for access by residents, visitors, and hospital workers. And the presence of the washed over settlement of Royal Earlswood significantly reduces the visual perception of the existing gap. With suitable mitigation measures to ensure a level of openness is retained on the expanded site, it is felt that the site could be considered to have only limited conflict with this Green Belt purpose.
- 6.74. To assist in safeguarding the countryside from encroachment: A large amount of the site is previously developed with the existing hospital buildings. Built form or hard standing covers approximately 34% of the proposed site area, making the site partially developed under the Green Belt Review criteria. In addition, the site is considered to have mostly strong boundaries, which further reduces the risk of encroachment onto the countryside.
- 6.75. To preserve the setting and special character of historic towns: The site is not close to the borough's only historic town Reigate, and will not have an impact on its setting or special character.
- 6.76. To assist in urban regeneration by encouraging the recycling of derelict and other urban land: As was discussed above, it is unlikely that the expansion of the hospital could be accommodated within the existing urban area, so that continuing to protect this area of Green Belt would be unlikely to encourage the use of derelict or other urban land in its place.

- 6.77. The release of this site for the expansion of the hospital would not conflict with four of the five Green Belt purposes, and would have only limited conflict with the remaining purpose.

Conclusion

- 6.78. In conclusion, there are exceptional circumstances for removing the hospital site from the Green Belt to allow the proposed expansion, in line with the exceptional circumstances test set in the Core Strategy.
- There is an overriding need for the development;
 - The development can theoretically be accommodated on land outside the Green Belt; however
 - Development within the Green Belt would be a significantly more sustainable option than development outside the Green Belt; and
 - The proposed removal would not seriously conflict with the purposes or integrity of the Green Belt.

Safeguarded Land

- 6.78. A site at Redhill Aerodrome is being proposed as safeguarded land beyond the end of the plan period, as set out in the Safeguarded Land report. This section will consider the case for exceptional circumstances for removing this land from the Green Belt and safeguarding it for potential development after the current plan period.
- 6.79. The exceptional circumstances test set out in the Core Strategy is for land to “be removed from the Green Belt and allocated for development”. In the case of safeguarded land, there is no current allocation for development being made – allocation for development would need to be confirmed in a future plan-making process. Consequently, the wording of the first three questions has been slightly altered here to reflect that no site allocation is currently forthcoming.

Is it necessary to safeguard land beyond the end of the plan period?

- 6.81. [Paragraph 83 of the NPPF](#) is clear that during the preparation of the local plan, “authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period”. Paragraph 85 states that local authorities should “where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period [and] satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period”.
- 6.82. Consequently, it was important that the Council consider the issue of safeguarded land beyond the end of the plan period in order to ensure that the

DMP is compliant with national policy. Without considering this issue, the Council could not be sure that the Green Belt boundaries would endure beyond the end of the plan period.

- 6.83. In the current plan period, the borough has an objectively assessed housing need of 600-640 dwellings per year. However, as was accepted during the Core Strategy examination, due to the numerous constraints on development within the borough, only a target of 460 homes per year can be achieved – and as shown above, even this target can only be reached with the use of urban extensions on Green Belt land.
- 6.84. The recent Housing White paper consultation has proposed standardising the method used for calculating local authority housing needs. Using the proposed methodology, the borough would have an objectively assessed need of 644 dwellings per year in the next plan period, although it should be noted that the actual housing target may be reduced below this again, as the same constraints that applied in the Core Strategy examination will still be in place.
- 6.85. The current pattern of urban and windfall development, and additional analysis from the HELAA, suggests that there is unlikely to be sufficient unconstrained land within the existing urban area to fully accommodate housing needs beyond the current plan period. There is some scope to provide housing on the identified urban extensions beyond the end of the current plan period – the current housing trajectory suggests that 310 units of the housing allocated for urban extensions in the DMP may not come forward until after 2027. In addition, site ERM2/3 is restricted by the operation of the adjacent landfill site, and may not be capable of development until post-2027. However, this would provide less than a year of the current housing target. Safeguarded land outside of the urban area would protect existing towns from over-development which could affect the character of the towns and the provision of the necessary infrastructure for residents.
- 6.86. In summary, development pressures within the borough are expected to continue beyond the end of the current plan period. It is unlikely that this pressure can be directed entirely within the urban area, and it was therefore considered to be necessary to look at safeguarding land within the Green Belt.

Is it possible to safeguard land outside the Green Belt?

- 6.87. It is extremely unlikely that the required amount of housing can be provided entirely from brownfield land within the urban area or windfall sites, with the most suitable sites currently known to the Council allocated as development sites for the current plan period. The remaining land in the borough that is not within the Green Belt is the Rural Surrounds of Horley. This area was split into multiple parcels of land for the Sustainable Urban Extensions Technical report and Green Belt Review. Parcels NWH1, NWH2, and SEH4 have been allocated within the DMP for urban extensions, parcels SEH1 and SEH2 have been allocated for a strategic employment site, and parcels EH2 and SEH7 have been allocated as part of the Riverside Green Chain. However, the

remaining parcels make up a total land area of 161.2ha. This would be more than enough land to accommodate the needed housing, meaning there are not exceptional circumstances for altering the Green Belt, unless it is clear that safeguarding within the Green Belt is a more sustainable option than safeguarding land outside of the Green Belt.

Is safeguarding land within the Green Belt a more sustainable option?

- 6.88. Of the available parcels within the Rural Surrounds of Horley, all except SEH3, SEH5, and SEH11 are located almost entirely within flood zones, and a large development in these areas would run contrary to Core Strategy and DMP policies on reducing flood risk. Parcel SEH3 is entirely within the Gatwick Open Setting which aims to maintain a separation between Gatwick Airport and Horley, and is also entirely within the 57dB noise contour of Gatwick Airport – development here would require significant mitigation to make it suitable for long-term human habitation without the potential for significant health problems. The majority of parcel SEH5 suffers from the same constraints. It is for these reasons that the sites were also considered unsuitable as sustainable urban extensions.
- 6.89. This leaves parcel SEH11 as the most suitable of the identified parcels in the RSH, as it is relatively free from flood risk, and unconstrained by noise or landscape designations. However, the parcel is only 37ha, and the area that is not at risk of flooding is even smaller, at roughly 11ha. Only a very small amount of the Rural Surrounds of Horley can therefore be considered a sustainable location for housing development beyond the plan period.
- 6.90. A process of identifying and assessing potential sites for safeguarded land was undertaken, as described in the Safeguarded Land Report. This identified a number of sites that could potentially be considered more sustainable than the majority of the land in the Rural Surrounds of Horley. A sustainability appraisal of spatial options was also undertaken, which concluded that a single large extension to an existing urban area or a single large standalone site would be the most sustainable options. These spatial types would be more able to provide a mix of land uses, including employment, community and recreation uses, which a series of smaller extensions would have difficulty supporting. These types of site would also be more able to support the funding of the necessary infrastructure. It was recognised that an extension may be slightly more sustainable than a standalone site, as it would be likely to have less impact on the landscape, although this would ultimately be dependent upon the choice of site.
- 6.91. With this in mind, and after an assessment of all the identified sites, the Redhill Aerodrome site was chosen as the preferred site for safeguarded land beyond the end of the plan period. The site is large enough to contain the required amount of housing, and has only limited risk of flooding in areas directly adjacent to the Salfords Stream. The site is not located within an area that suffers from air quality or noise management problems. The site is partially previously developed land, currently being used as an aerodrome, and its redevelopment for housing would be a sustainable use of previously

developed land and would require the cleaning up of any contamination currently on the site. The ability to provide a large standalone settlement in this location due to the reduced risk of flooding makes the provision of local services easier, which may reduce the need to travel. When taking into account the level of housing needed beyond the plan period, the Redhill Aerodrome site should be considered a significantly more sustainable option than development on the remaining, flood-prone parcels of the Rural Surrounds of Horley.

- 6.92. In addition to this, the proposed site is not being safeguarded speculatively, but has been promoted through the SHLAA and HELAA processes. The site is thus available and developable, and while any decision on whether to actually develop it has still to be taken in a future review of the local plan, the site can realistically provide for some of the borough's housing need in the future.
- 6.93. Consequently, while land within the countryside outside the Green Belt could theoretically be safeguarded, safeguarding the proposed land within the Green Belt is considered to be a more sustainable option. This means that there may be exceptional circumstances for altering the Green Belt, as long as the proposed changes do not seriously conflict with the purposes or integrity of the Green Belt.

Would this proposal seriously conflict with the purposes or integrity of the Green Belt?

- 6.94. As part of the safeguarded land report, each potential safeguarding site was assessed against the five purposes of the Green Belt. The Redhill Aerodrome site was assessed to have a moderate importance for purposes 1 and 3, high importance for purpose 2, and low importance for purposes 4 and 5. For comparison, the parcels in the Rural Surrounds of Horley were also assessed against the Green Belt principles in Part 1 of this report, and site SEH11 (the most suitable remaining parcel in the Rural Surrounds due to its relative lack of flood risk) was actually found to score slightly more strongly against the purposes than the Redhill Aerodrome site – SEH11 was assessed to have a high importance for purposes 2 and 3, moderate importance for purpose 1, and low importance for purposes 4 and 5.
- 6.95. The second purpose of the Green Belt, for which the Redhill Aerodrome site was judged to be of high importance, is the need to maintain a separation between settlements. The proposed land to be safeguarded would indeed remove the separation between the settlements of South Earlswood and Salfords were it all to be developed. However, this is not the intention. The development as currently proposed would leave green buffer zones maintaining a separation from both South Earlswood and Salfords, and it is intended for these buffer zones to be made clear in any future site allocation on this land.
- 6.96. The additional land is proposed for safeguarding for two primary reasons. Firstly, it is considered sensible to safeguard land that will be needed to provide access to a future development on this site, and this will include

securing a link road from the M23 to East Surrey Hospital. Secondly, to ensure that the buffer zones are safeguarded in order that they can perform that function if development takes place. By safeguarding the land for the buffer zones, continued settlement separation can be ensured in the future, supporting the purposes of the Green Belt. Therefore it is felt that although there is some conflict with the purposes of the Green Belt, the conflict is not serious and can be mitigated.

- 6.97. It should be noted that the site promoters for Redhill Aerodrome have indicated that their proposals are to be advanced with reference to the Government's Prospectus for Garden Communities 2016. The Garden Communities housing initiative reflects latest Government policy, which sees some merit in certain circumstances for advancing relatively self-contained and stand-alone sustainable communities which are physically separate from existing settlements. Garden Community proposals have been promoted in both open countryside and Green Belt locations. This possibility is not referred to in the NPPF and it is not clear if this will be addressed in the proposed review of the NPPF in 2018. It does not feature in the spatial strategy of the current adopted Core Strategy for the area. Whether, in order to achieve this aspect of Government Housing Policy, the criteria for removing land from the Green Belt will be addressed explicitly remains to be seen. Currently there appears to be some implicit support in Government policy on Garden Settlements to regard this as an additional criterion to apply to the "planning balance" rationale in a Green Belt situation. As proposals elsewhere progress no doubt there will be efforts to settle the present uncertainty.

Conclusion

- 6.98. In conclusion, there are exceptional circumstances for safeguarding the proposed land for potential development beyond the current plan period, broadly in line with the exceptional circumstances test set in the Core Strategy.
- There is a need to safeguard land beyond the end of the current plan period;
 - Land could theoretically be safeguarded outside the Green Belt; however
 - Safeguarding the proposed site within the Green Belt would be a significantly more sustainable option; and
 - The proposed alteration would not seriously conflict with the purposes or integrity of the Green Belt.

Rural Surrounds of Horley

- 6.99. This section considers whether there are 'exceptional circumstances' for adding the land currently within the Rural Surrounds of Horley designation to the Green Belt. This will involve considering the Rural Surrounds of Horley against the five criteria in [paragraph 82 of the NPPF](#).

Demonstrate why normal planning and development management policies would not be adequate

- 6.100. The Rural Surrounds of Horley is likely to experience a particularly high level of pressure for development due to being the only area of the borough outside of both the urban area and the Green Belt. This will be particularly so if there is ever a shortfall in the five year housing supply. A recent appeal on Land at 17 The Close, Horley (Ref: APP/L3625/W/15/3141260) allowed permission, with the reasoning including the site being within the RSH, albeit this appeal was quashed in the High Court and has now been reverted to another Planning Inspector for determination. However, the principle is one that may be tested again in the future should the Council not be able to demonstrate a five year housing supply.
- 6.101. However, at this point in time, there is no strong evidence of exceptional pressure for development on the Rural Surrounds of Horley outside of the planned urban extensions, with only a limited number of speculative applications made in the area since the 2005 Borough Local Plan was adopted. In addition, the policies in the proposed Development Management Plan allow for the release of Sustainable Urban Extension sites to be phased in order to ensure that the borough has a five year housing land supply throughout the plan period.
- 6.102. The RSH falls largely within Flood Zones 2 and 3. Whilst this currently precludes the majority of development in this area, given the requirements of national policy to direct development away from flooding, it is understood that the Environment Agency and landowners of some of the parcels of land are currently looking at the potential to use flood mitigation to improve the flooding situation in this area. Should this be the case then as discussed in the paragraph above this land is likely to be the subject of pressure for housing. However, at this point, there is no firm evidence on how the flooding situation in the area may change in the coming years. In addition, flood zone policy should not be used to restrict development *per se*, but rather to ensure that development is sustainable and safe for human habitation. Consequently, the borough should not rely on the existence of a flood zone in the Rural Surrounds of Horley to restrict development in this area – if the flood zone is reduced, existing planning policies should be relied upon to determine future applications for permission in the same way as they currently are for areas in the RSH that are not within the flood zone.
- 6.103. In summary, existing planning and development management policies appear to be adequate at this time to deal with development in the RSH.

Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary

- 6.104. The Inspector's report for the Borough Local Plan 2005 examination notes that Horley was seen as an opportunity to provide houses in a strategically useful and sustainable location near Gatwick that should be grasped. The RSH designation was added to the requirement for the Borough for that

reason and this was the justification for the addition to the Structure Plan total for the Borough in the first place. However, the Inspector considered that whether to designate the remaining Rural Surrounds of Horley as Green Belt could be a matter considered at the next review of the local plan.

- 6.105. Since 2006, 42% of all units permitted for the borough have been in Horley. A large part of this is due to the creation of two new neighbourhoods on the northern edge of Horley, the Horley East and Horley West urban extensions. Whilst it is acknowledged that not all planning permissions will be built out, this is still indicative of the amount of development that Horley has faced over the last 10 years.
- 6.106. The DMP is also proposing 3 additional Sustainable Urban Extensions (totalling 185 homes) around the north and east edge of Horley and a major Employment Site to the south of Horley. Along with the other site allocations in the rest of the borough, these will provide adequate land to accommodate development needs and targets, both in line with targets set out in the Core Strategy and any subsequent needs that have been identified through the DMP process.
- 6.107. Ultimately, however, almost all development in the RSH in recent years has been led by the plan-making process. There is very limited evidence of pressure for speculative development in the RSH outside of the plan-making process. Consequently, while circumstances have changed significantly in Horley over the past decade, they have only changed in a way which was anticipated in the Borough Local Plan 2005.
- 6.108. The largest potential change in circumstances to come is the Strategic Employment Site in the south of the RSH. The [Strategic Highway Assessment](#) suggests that if this site comes forward it could, if appropriate mitigation is not put in place, increase traffic in some areas of Horley. This could be an argument for placing the remaining RSH into the Green Belt to restrict development in the area that may further worsen traffic.
- 6.109. Circumstances have also changed in terms of planning policy with the proposed area of safeguarded land at Redhill Aerodrome which will accommodate growth beyond the plan period. This site has been identified following constraints assessments, Green Belt reviews and sustainability appraisals of a range of alternative sites (including around Horley) and is being put forward as the most sustainable option for future housing growth beyond the end of the current plan period. As such, the usefulness of 'safeguarding' land for future development by using the designation of the RSH is reduced, as this land has already been appraised in the safeguarded land report and found not to represent the most sustainable long-term option for housing delivery.
- 6.110. In summary, while circumstances have changed in Horley since the Borough Local Plan 2005 was adopted, it is not clear that these changes are significant enough to warrant the exceptional measure of adding the RSH to the Green Belt, although it could be argued that the presence of safeguarded land

elsewhere in the borough significantly reduces the need to keep the RSH 'safeguarded' for future development using the RSH designation.

Show what the consequences of the proposal would be for sustainable development

- 6.111. While it is important to seek to maximise development opportunities on non-Green Belt areas, it is also important to consider wider sustainability implications. This includes overall distribution and the need to locate development in sustainable locations that can maintain the vitality and vibrancy of our settlements.
- 6.112. In line with the 2005 BLP examination Inspectors report, the Council considers it appropriate to maximise the use of RSH where it is sustainable to do so. For this reason, it is still proposed that three Sustainable Urban Extensions be allocated within the RSH (NWH1, NWH2 and SEH4). A major business park is also proposed on SEH1 and SEH2 which would deliver around 210,500 sqm of floorspace. Parcels NWH3 and NEH1 will be designated as part of the Riverside Green Chain around Horley, which will protect them from future development, although these areas were already largely protected from development due to extensive flood zones.
- 6.113. There is nevertheless a point at which the harm of directing additional development to the RSH will outweigh the benefits of doing so. In particular, the level of new housing concentrated to the north of Horley will generate additional traffic on key access routes within and around Horley. Whilst the transport modelling does not indicate that the development proposed in the DMP cannot be accommodated, it will likely put a strain on the local road network all the same.
- 6.114. The [Strategic Highway Assessment](#) also suggests that if the Strategic Employment Site in the south of the RSH comes forward, this will increase traffic within parts of Horley, unless appropriate mitigation action is taken. Again, the assessment suggests that this increase will be manageable (and the proposed DMP policy requires measures to minimise use of the private car and promote modal shift), but a further increase in traffic on top of this would potentially place an undue level of stress on transport infrastructure in the area. Consequently, there is a sustainability argument for placing the remaining RSH into the Green Belt to prevent further development in the area beyond that which is planned in the DMP.
- 6.115. A [Sustainability Appraisal](#) was undertaken which assessed the sustainability of the land parcels within the RSH. This showed that, in the main, the land parcels were not that sustainable for development, and highlighted a number of potential problems around flood risk, sustainable transport, air quality, and landscape impact. Placing these parcels into the Green Belt would prevent development taking place in unsustainable locations.
- 6.116. In summary, placing the remaining areas of the RSH into the Green Belt would likely have a positive effect on sustainable development, The most

sustainable locations for development within the RSH have already been identified and allocated. Development on the remaining parcels would be unsustainable with regard to a number of the sustainability framework principles.

Demonstrate the necessity for the Green Belt and its consistency with local plans for adjoining areas

6.117. A detailed analysis of the RSH parcels was carried out in Part 1 of this report. Despite not being located within the Green Belt, each parcel was assessed for its potential contribution to the purposes of the Green Belt. This assessment was used to prioritise the land parcels in order of their contribution to the Green Belt purposes, and to contribute towards decisions on which site should be prioritised for housing development.

6.118. The parcels which have not been allocated for urban extensions in the DMP show a mixed level of importance to the Green Belt purposes, with parcels EH1, SEH6 and SEH7 being of a fairly low priority, and the remaining parcels making a moderate to higher contribution to the Green Belt. It could therefore be argued that there is some necessity of putting the higher-performing parcels into the Green Belt to ensure they continue to play this role. However, this argument is undermined somewhat by the failure to demonstrate any significant pressure for speculative development in the RSH. This suggests that if the land is kept as RSH rather than put into the Green Belt, it will still be able to perform the same functions for the foreseeable future.

6.119. In terms of consistency with local plans for adjoining areas, the RSH is separated from the boundary with Tandridge by a strip of Green Belt within the Reigate & Banstead borough extent. Crawley does not have any Green Belt but does have a Biodiversity Opportunity Area which abuts the southern edge of the RSH. It is felt that a proposal to place the RSH into the Green Belt would not conflict with either of the adjoining areas' local plans.

Show how the Green Belt would meet the other objectives of the framework

6.120. Beyond the criteria discussed above, placing the RSH into the Green Belt is considered to meet some of the other objectives of the NPPF in the following ways:

- The 12 principles of planning include that planning should:
 - *Always seek a good standard of amenity for all existing and future occupants of land and buildings (paragraph 17, bullet 4)*
 - The limitation on future extensive development in an area which has already been subject to a large amount of development would help to secure a good standard of amenity for existing and future occupants of land and buildings.
 - *Take account of the different roles and character of different areas and recognise the intrinsic character and beauty of the countryside (paragraph 17, bullet 5)*

- The proposed change would recognise that the RSH is an important part of the countryside of the borough, and has an intrinsic countryside character comparable to that of the current Green Belt.
 - *Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs (paragraph 17, bullet 12)*
 - A Green Belt designation would prevent further urban sprawl and ensure that adequate infrastructure can be provided for existing and committed development.
- *Defining Green Belt boundaries clearly, using physical features that are readily recognisable and likely to be permanent (paragraph 85, bullet 6)*
 - If the RSH is placed into the Green Belt, the Green Belt boundary would be formed by a strong tree line which extends all the way along the boundary between the urban area and the current RSH.

Conclusion

6.121. In conclusion, it is believed that there are no exceptional circumstances to justify placing the Rural Surrounds of Horley into the Green Belt. This is on the basis that:

- Normal planning and development management policies would be adequate to control development within the RSH
- There have not been major changes in circumstances that would make the adoption of this exceptional measure necessary, as all changes in circumstances were planned for
- It is difficult to demonstrate any necessity for the additional Green Belt

6.122. Because of this, the proposal fails the exceptional circumstances test, even though it would have a positive impact on sustainability, would be consistent with local plans for adjoining areas, and would assist in the achievement of some of the other policies of the NPPF.

Summary of Exceptional Circumstances Conclusions

6.123. Having reviewed the case for exceptional circumstances for the proposed changes to the Green Belt, the following conclusions have been reached:

- There are exceptional circumstances for releasing land from the Green Belt for the proposed Sustainable Urban Extensions
- There are exceptional circumstances for amending the Green Belt anomalies
- There are exceptional circumstances for washing over the inset area of Babylon Lane

- There are exceptional circumstances for inseting the washed over village of Netherne-on-the-Hill
- There are exceptional circumstances for releasing land from the Green Belt for the proposed gypsy and traveller sites
- There are exceptional circumstances for releasing the East Surrey Hospital site from the Green Belt
- There are exceptional circumstances for releasing the Redhill Aerodrome site from the Green Belt for safeguarding purposes
- There are no exceptional circumstances to justify placing the land currently within the Rural Surrounds of Horley designation into the Green Belt

7. Conclusions and recommendations

- 7.1 This review has been prepared to inform the Regulation 18 DMP consultation document. It covers the specific aims set out in Policy CS3 by:
- Considering – at a more detailed level - the extent to which land within the broad areas of search identified for urban extensions contributes to the purposes of the Green Belt in order to inform the identification of potential development sites;
 - Assessing whether any land currently beyond the Green Belt boundary should be included within it, through a review of the Rural Surrounds of Horley designation;
 - Considering whether there are any anomalies in the borough’s Green Belt boundary and identifying where boundaries could be revised to align with clear and strong physical features; and
 - Assessing whether any washed over villages should be removed from the Green Belt and whether any inset areas should be included within it.
- 7.2 The key findings and recommendations from each of the four parts of the review are set out below:
- 7.3 *Part 1: Review of land within the broad areas of search for sustainable urban extensions and land currently beyond the Green Belt:*
- In identifying potential development sites within the areas of search within the Green Belt, land parcels identified as making either: a) a higher contribution to any purpose, or b) a moderate (or greater) contribution to three or more purposes, should not be considered for removal from the Green Belt through the plan-making process as there would be direct conflict with the principle of Core Strategy Policy CS3(3b)⁶.
 - In all other cases, including for land currently beyond the Green Belt in Horley, sites with a lower overall contribution to the purposes of the Green Belt should be favoured as potential development opportunities (subject to consideration of all other constraints).
 - Consideration should be given to exploring the principle of putting areas/parcels of land around Horley into the Green Belt where they are identified as making a significant contribution to Green Belt purposes (and where the land is not required to deliver development needs). It is recommended this principle is tested through the Regulation 18 consultation.
- 7.4 *Part 2: Review of minor boundary anomalies*
- A number of potential minor changes to, and re-alignment of, Green Belt boundaries are proposed to address anomalies and ensure strong, readily recognisable and permanent

⁶ That is to say that due to their contribution, their release would result in a significant conflict with the purposes of the Green Belt and certainly not the “no or limited” conflict set out in Policy CS3.

- These changes – as described in Table 8 on maps in Appendix 2 – should be consulted on through the Regulation 18 DMP consultation and, subject to this, included on the Proposals Map.

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

- The village at Netherne-on-the-Hill, as defined in Appendix 3 – makes a low contribution to the Green Belt and consideration should be given to excluding it from the Green Belt.
- The loose-knit residential area at Babylon Lane – which is currently inset within the Green Belt – should instead be included within, and washed over by, the Green Belt.
- Views on both of these proposed amendments should be sought through the Regulation 18 consultation on the DMP.

7.6 *Part 4: Review of exceptional circumstances justifying the alteration of the Green Belt boundary*

- There are exceptional circumstances for releasing land from the Green Belt for the proposed Sustainable Urban Extensions
- There are exceptional circumstances for amending the Green Belt anomalies
- There are exceptional circumstances for washing over the inset area of Babylon Lane
- There are exceptional circumstances for inseting the washed over village of Netherne-on-the-Hill
- There are exceptional circumstances for releasing land from the Green Belt for the proposed gypsy and traveller sites
- There are exceptional circumstances for releasing the East Surrey Hospital site from the Green Belt
- There are exceptional circumstances for releasing the Redhill Aerodrome site from the Green Belt for safeguarding purposes
- There are no exceptional circumstances to justify placing the land currently within the Rural Surrounds of Horley designation into the Green Belt

7.7. It should be noted that this review is a technical evidence base document which specifically considers the single aspect of Green Belt. **This study does not allocate land for development nor does it, in itself, remove land from the Green Belt.** Any changes to Green Belt boundaries will also only be made through the Development Management Plan. The findings of this review and other technical work being undertaken will be considered together, along with any other material considerations, in the selection of potential development sites which will be set out in the final Development Management Plan.