



Development Management Plan (Regulation 18 stage)

Green Belt Review

June 2016

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.

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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 – 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;
 - 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;
- 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 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 also only be made through the Development Management Plan.

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:

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

- **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

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 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.
- 2.7 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.

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

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.
- 2.13 Policy CS3 sets out that land may also be safeguarded through the DMP to provide options to meet longer term development needs.

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 has carried out a “Stage 2” Sustainable Urban Extensions study which focusses down in greater detail on the suitability, sustainability and achievability of individual sites. The findings of this work will inform the prioritisation of sites in that study and subsequent site allocations. 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 and land currently beyond the Green Belt

Overview

- 3.1 The primary purpose of Part 1 of this study is to provide evidence to support the identification of sites for urban extensions in the Development Management Plan (in line with Core Strategy Policy CS3 4a) and to assess those areas currently beyond the Green Belt to inform whether the land should be included, or remain excluded, from the Green Belt (reflecting Policy CS3 4c of the Core Strategy).

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 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 will be 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, unprotected woodland and hedgerows, field boundaries
Vegetation – dense tree belts, protected woodlands and hedgerows	
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 <u>or currently beyond</u> 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.
- 3.10 Taking account of both 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. 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 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 contained is the parcel?</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

- 3.14 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.

- 3.15 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

- 3.16 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.
- 3.17 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

- 3.18 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 its openness and that, once established, Green Belts should be enhanced for beneficial use.
- 3.19 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	
	<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
Are there strong boundaries which would prevent physical or visual encroachment in the long term?	<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

- 3.20 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.

- 3.21 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

- 3.22 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.
- 3.23 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.
- 3.24 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

- 3.25 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.
- 3.26 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.
- 3.27 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

- 3.28 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.
- 3.29 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.
- 3.30 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.
- 3.31 In terms of interpretation and use of these conclusions to inform decision-making on site allocations, those parcels currently in the Green Belt which make 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 release as there would be direct conflict with the principle of Core Strategy Policy CS3(3b)⁶. For other sites, and sites currently beyond the Green Belt in Horley, their overall ranking should be used to inform prioritisation along with the results of the separate constraints assessment.
- 3.32 Detailed assessments for each of the parcels are included at Appendix 1.

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.

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	5 - 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	4
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 – Hartwood Nursery and surrounds	Moderate	Lower	Moderate	Lower	Lower	
South West Reigate	SSW9 – Land at Dovers Farm	Moderate	Lower	Moderate	Lower	Lower	3
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	2
South West Reigate	SSW6 – Land west of Castle Drive	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	1 - highest
South West Reigate	SSW4 – Land at Clayhall Lane	Higher	Moderate	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	SEH9 – Land east of Wilgers Farm	Moderate	Lower	Higher	Lower	Lower	
Horley surrounds	SEH10 – Land east of Farney View Farm	Moderate	Moderate	Higher	Lower	Lower	2
Horley surrounds	EH3 – Land north of Smallfield Road	Moderate	Higher	Moderate	Lower	Lower	
Horley surrounds	SEH5 – Land west of Burstow Stream	Higher	Moderate	Higher	Lower	Lower	1 – highest
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	
Horley surrounds	EH2 – Brook Wood	Moderate	Higher	Higher	Lower	Lower	

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, Lower Kingswood	Although a somewhat urban feature, the existing 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 insetting 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 therefore not considered to be a village in its own right
	<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.	

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

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 It is recommended that the changes are consulted upon as part of the Regulation 18 DMP consultation and consideration be given to their incorporation on the Policies Map.

6. Conclusions and recommendations

- 6.1 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 currently beyond the Green Belt boundary should be included within it;
 - 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.
- 6.2 The key findings and recommendations from each of the three parts of the review are set out below:
- 6.3 *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)⁷.
 - 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.
- 6.4 *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
 - 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 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.

6.5 *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.

6.6 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.