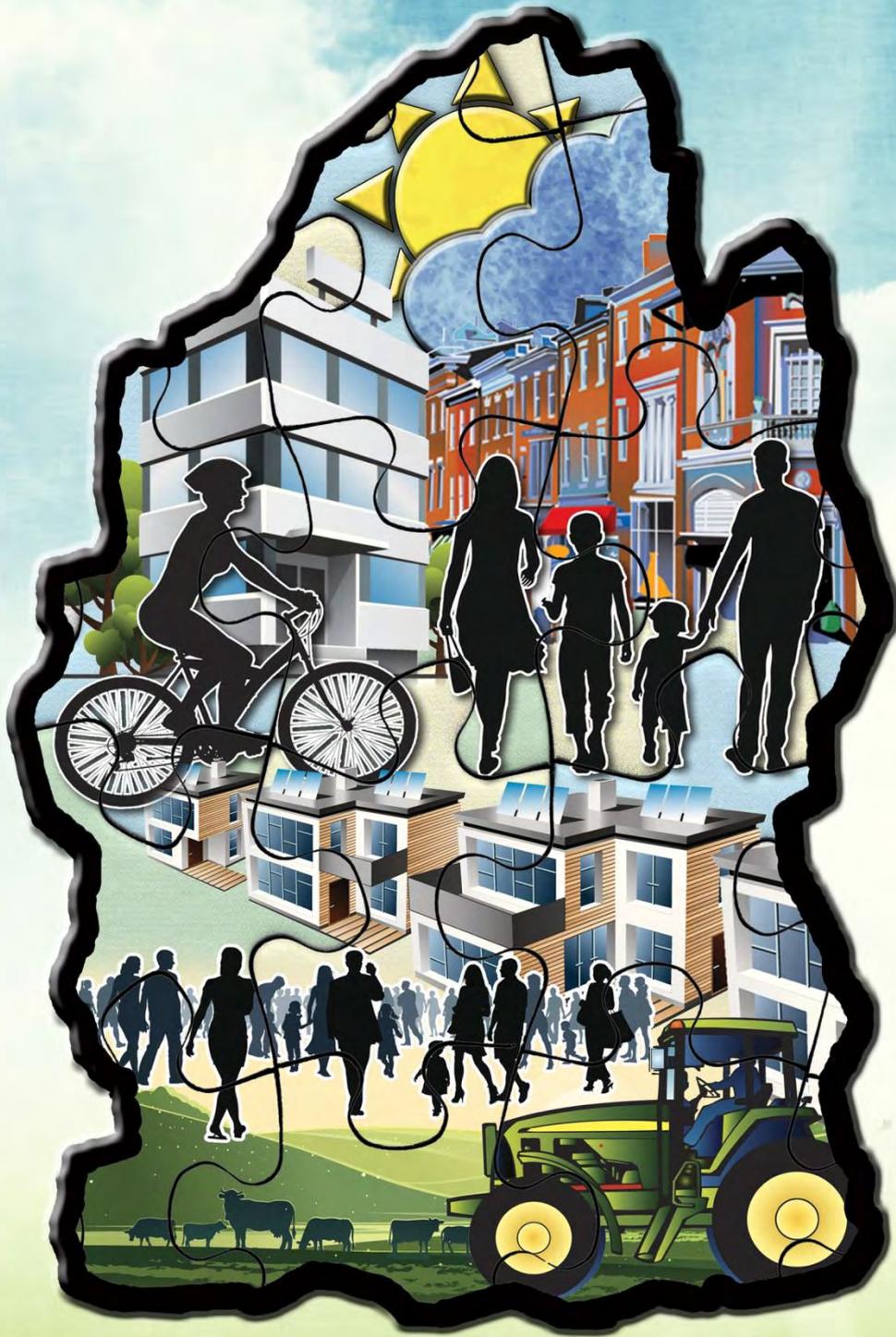


Our Local Plan



Green Belt Assessment (Part 2):
Areas for Further Investigation

October 2016

Contents

Executive Summary	4
1.0 Introduction	5
Background.....	5
The Plan-making Process	5
The Green Belt Assessment	6
Study Area	7
Objectives of the GBA: Areas for Further Investigation	8
2.0 Study Methodology	11
Process.....	11
Stage 1: Defining the Assessment Area	13
Stage 2: The Assessment process.....	14
Pro forma	14
Aerial photography.....	15
GIS	15
Site Visits.....	15
Assessment Considerations.....	15
Previous Consultation	17
Additional Areas.....	17
Removal of Areas	17
Other issues raised	18
Stage 3: Conclusions of this study	18
Critical review	19
3.0 Further Areas for Investigation – Assessments	19
Findings	19
Areas that should be considered further in terms of whether or not exceptional circumstances exist.....	20
Settlements that require protection for reasons other than their contribution to openness and are recommended for further consideration in terms of inseting through the Local Plan	20
Areas which should not be considered any further	20
4.0 Areas for Further Investigation: Exceptional Circumstances	21
5.0 Areas for Further Investigation: Settlements to be considered for inseting	27
6.0 Conclusions and recommendations	32
7.0 Next Steps	36
Risks.....	37
8.0 Glossary.....	38
A.1. Appendix 1.....	41

What does this document do?	What does this document <u>not</u> do?
<ul style="list-style-type: none"> • Constitutes the 2nd Part of the Green Belt Assessment. 	<ul style="list-style-type: none"> • Consider all Green Belt land in Tandridge.
<ul style="list-style-type: none"> • Provides detailed analysis of Areas for Further Investigation. 	<ul style="list-style-type: none"> • Draw up, review or alter Green Belt boundaries or inset settlements.
<ul style="list-style-type: none"> • Considers the open character of villages and settlements and their contribution to the openness of the wider Green Belt. 	<ul style="list-style-type: none"> • Allocate land or assess the suitability of land for development.
<ul style="list-style-type: none"> • Recommends Areas to be considered in Part 3 of the Green Belt Assessment. 	<ul style="list-style-type: none"> • Consider other constraints, such as infrastructure issues and flood risk.
<ul style="list-style-type: none"> • Rules out some areas of Green Belt land from further consideration as part of the Green Belt Assessment. 	<ul style="list-style-type: none"> • Constitute a 'stand- alone' document.

Executive Summary

The Green Belt Assessment constitutes an evidence base study that is being prepared to inform and support the Tandridge Local Plan. This Green Belt Assessment: Areas for Further Investigation (October 2016) constitutes Part 2 of the Green Belt Assessment and considers the Areas for Further Investigation identified in the Green Belt Assessment (December 2015) in detail. Hereafter these reports are referred to as Green Belt Assessment (Part 1) (December 2015) and Green Belt Assessment (Part 2): Areas for Further Investigation.

In line with the agreed Methodology (June 2015), it considers a total of 54 Areas for Further Investigation in terms of their role in serving the Green Belt purposes, their openness and contribution to the openness of the wider Green Belt. These areas all contain clusters of development.

On the basis of detailed analysis, this Part 2 Assessment concludes that a number of Areas should be considered further in Part 3 of the Green Belt Assessment. It identifies a total of 13 Areas to be considered in Part 3 of the Green Belt Assessment in terms of whether or not exceptional circumstances exist that may justify alterations to the Green Belt boundary. In addition, the Report identifies 11 Areas to be considered in Part 3 in terms of whether or not they should be inset and excluded from the Green Belt designation through the Local Plan. A number of recommendations are made to guide the further consideration of those Green Belt areas in Part 3 of the Green Belt Assessment.

In conclusion, the Green Belt Assessment (Part 2): Areas for Further Investigation rules out the remaining Areas for Further Investigation from further consideration as part of the Green Belt Assessment. However, areas ruled out from further consideration as part of the Green Belt Assessment may still be considered for exceptional circumstances on the basis of other evidence base considerations through the Local Plan process.

1.0 Introduction

Background

1.1 Tandridge District Council (TDC) is preparing a new Local Plan that will provide strategic direction to development in the District up to 2033. As part of the wider evidence base, a Green Belt Assessment is being prepared to support and underpin the emerging Local Plan. The overall objective of the Green Belt Assessment is to ensure that the Council has considered the role of the Green Belt in the District, establish how successfully it serves the Green Belt purposes (listed below) and to ensure that the Local Plan retains a Green Belt boundary that is fit for purpose in the long term in accordance with paragraph 83 of the National Planning Policy Framework (NPPF).

Paragraph 80

The Green Belt serves five purposes:

- 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.

The Plan-making Process

1.2 As a first step in the process, a Local Plan Issues and Approaches document was prepared for consultation that set out a vision for how the District will look in 2033, the main issues facing the District and a range of options of how to respond to these issues. In addition, the document identified a number of conceptual approaches to delivery strategy.

1.3 In accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 the District Council carried out public consultation on the Local Plan Issues and Approaches document between December 2015 and February 2016. The consultation was essentially a scoping exercise to provide opportunity for public comment on what the Local Plan should contain, and sought views on all aspects of the document.

1.4 As a second step, a Sites Consultation document is being prepared, which sets out a number of potential development sites and broad areas that are being considered in terms of their capacity and suitability for accommodating development as well as deliverability over the plan period. The Sites Consultation document is subject to public consultation during November and December 2016.

The Green Belt Assessment

1.5 The Green Belt Assessment (Part 1) (December 2015) was prepared and published alongside the Issues and Approaches document. It focussed exclusively on designated Green Belt land, including settlements and development within the designated Green Belt ('washed over'¹). The Green Belt Assessment (Part 1) (December 2015) sets out:

- A historic assessment of the Green Belt in Tandridge District with focus on the settlements, explaining the main changes that have occurred since the Green Belt was designated and considering, at high-level, their contribution to openness.
- A high-level strategic assessment of the Metropolitan Green Belt. This divided the District into three strategic areas and explained the performance of each strategic area against four out of five Green Belt purposes².
- A detailed parcel assessment that considers each of the 47 GBA parcels against the four purposes of the Green Belt.³

1.6 Bringing together these three assessment elements, the Green Belt Assessment (Part 1) (December 2015) concluded that the majority of Green Belt in Tandridge is effective at serving at least one Green Belt purpose⁴ and therefore does not require further analysis as part of the Green Belt Assessment.

1.7 However, it recognised that some areas of designated Green Belt land may require more detailed assessment and identified a number of areas which either serve the Green Belt purposes less or more obviously/effectively. These have been referred to as Areas for Further Investigation. Those identified because they serve the purposes less obviously/effectively primarily include areas centred on clusters of existing development within the Green Belt, such as settlements, employment areas and other concentrations of development that may reduce openness. Whilst those which were identified because they more obviously/effectively serve the purposes were recommended in order to understand the effective role played by those areas and to identify opportunities to further protect and/or enhance those areas. In both cases further investigation was recommended to understand the reasons for, and circumstances surrounding, development in the Green Belt that has had an impact on the areas' contribution to the purposes of the Green Belt.

¹ The term 'washed over' is defined in the Glossary (Section 8.0 of this Report) as are other technical terms.

² Purpose 5 is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Given the difficulty in assessing how an area of Green Belt land is directly responsible for brownfield development on the basis of assumptions relating to viability and developability, purpose 5 can only be effectively considered on a case-by-case basis through the Local Plan process, rather than through the Green Belt Assessment as explained in paragraphs 3.35 – 3.36 of the Methodology (June 2015).

³ See paragraph 1.1 of this Report and footnote 2 above.

⁴ The Green Belt purposes are listed at paragraph 1.1 of this Report.

- 1.8 In addition, the Green Belt Assessment (Part 1) (December 2015) set out a number of recommendations that guide the further investigation of these Areas. This Report comprises Part 2 of the Green Belt Assessment, which will form part of the evidence base for the Local Plan and inform its preparation. It takes forward recommendations 2, 3 and 4 set out in the Green Belt Assessment (Part 1) (December 2015) and considers the Areas for Further Investigation in greater detail.

Recommendation 2 – Ensure that the roles of the Green Belt parcels which serve the Green Belt more effectively are recognised.

Recommendation 3 – Carry out additional work within the Areas for Further Investigation to determine why they serve the Green Belt less effectively.

Recommendation 4 – Carry out additional work to consider the existing boundaries of the Green Belt in Tandridge to ensure they are robust and defensible for the long-term.

Study Area

- 1.9 The Green Belt Assessment (Part 2): Areas for Further Investigation considers a total of 54 indicative Areas for Further Investigation. These include the 49 areas that were identified in Appendix F of the Green Belt Assessment (Part 1) (December 2015) as deviating⁵ in their contribution to the Green Belt purposes.
- 1.10 Out of these 49 Areas for Further Investigation identified in Part 1, ten have now been extended in terms of the area to be considered, either:
1. In order to assess their wider context as part of this assessment; or
 2. To more closely reflect the description of the Area set down in Part 1.

These include Areas for Further Investigation 007, 014, 017, 026, 029, 030, 037, 038/42, 039 and 041.

- 1.11 Areas 038 and 042 have been amalgamated to form one large Area for Further Investigation as they overlap.
- 1.12 Lastly, six additional Areas for Further Investigation have been added for detailed consideration primarily in response to consultation undertaken through the Issues and Approaches document and through the evidence collation process.

⁵ The term 'deviating' was used in Part 1 of the Green Belt Assessment and has been carried forward into the Part 2 of the Green Belt Assessment to ensure consistency. The term has been used to describe areas which deviate either positively or negatively from the Green Belt purposes i.e. more or less effectively/obviously.

- 1.13 Due to the amalgamation of Areas 038 and 042, which as a result have the single reference number AFI 038/042, the total number of Areas amounts to 54. However, the numbering has been continued from 050 onwards, with the last reference number being AFI 055. Section 2 sets out the justification for the inclusion of additional Areas for Further Investigation.
- 1.14 An overview map of all indicative Areas for Further Investigation considered as part of this Report can be found in Appendix 1. Collectively, these constitute the Study Area for the purpose of this Report.

Objectives of the GBA: Areas for Further Investigation

- 1.15 The overall objective of the Green Belt Assessment is to determine how Green Belt land within the District should be considered as part of the Local Plan process. This can only be determined after a number of assessment stages have been carried out. The Green Belt Assessment is just one piece of the wider evidence base which informs and supports the preparation of the Local Plan.
- 1.16 As a first step in the process, the Green Belt Assessment (Part 1) (December 2015) sought to consider the strategic role of the Green Belt, the context and relationship of each settlement with the Green Belt in terms of openness, and the individual performance of each Green Belt parcel against four out of the five national Green Belt purposes. It concluded that the majority of Green Belt in Tandridge is effective at serving at least one Green Belt purpose, but recognised that some areas need further detailed analysis. Green Belt land outside the Areas for Further Investigation will not be re-visited in this Part 2 of the Green Belt Assessment, except for those identified in paragraphs 2.26 – 2.28.
- 1.17 This Report builds on the initial findings of the Green Belt Assessment (Part 1) (December 2015) and takes forward its recommendations in providing further, detailed analysis of those locations which were identified as Areas for Further Investigation. On the basis of the detailed analysis, this Report seeks to further sift and scrutinise these Areas in order to identify those that should be considered further still, as part of the Green Belt Assessment and potentially the Local Plan process⁶. This will enable the consideration of these areas in Part 3 of the Green Belt Assessment in the following contexts.

1. Exceptional circumstances

Paragraph 83 of the NPPF states that Green Belt boundaries may only be altered in exceptional circumstances through the preparation of a Local Plan. To determine whether an Area for Further Investigation should be carried forward to be considered in Part 3 of the Green Belt Assessment in terms of exceptional circumstances, the detailed analysis set out in this Report seeks to:

⁶ The 3 parts of the Green Belt Assessment process are illustrated in section 7.0 of this Report Figure

- Understand the circumstances surrounding development in the Green Belt, including development that pre-dates the Green Belt designation and development that was permitted on the basis of very special circumstances, and to consider its impact on an area's performance against the Green Belt purposes.
- Establish a detailed understanding of existing boundaries, considering robustness and defensibility, permanence and likely endurance beyond the plan period.

The Green Belt Assessment (Part 2): Areas for Further Investigation, however, does not attempt to determine whether exceptional circumstances exist that might justify the Green Belt boundaries being altered. The consideration of exceptional circumstances will take place through the Local Plan process, including the consideration of the wider evidence base and the process of arriving at a preferred strategy for the District.

It should be noted that the consideration of exceptional circumstances through the Local Plan process is essentially different from the consideration of 'very special circumstances'⁷ carried out through the planning applications process. These two processes should not be confused.

2. Settlements

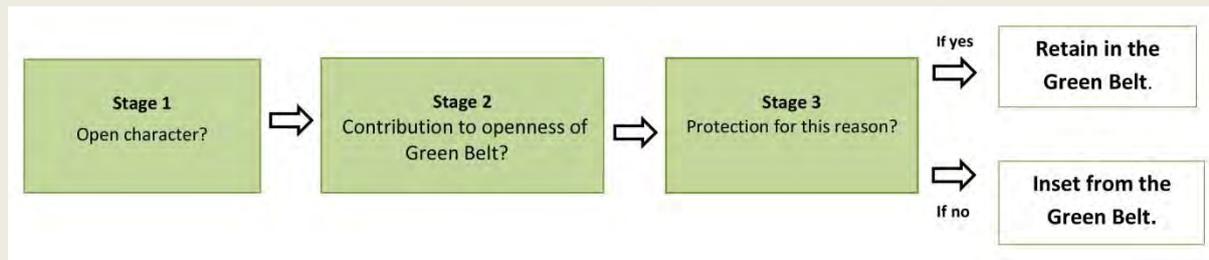
Openness is one of the two essential characteristics of the Green Belt. Paragraph 86 of the NPPF states that if the character of a village needs to be protected for reasons other than its contribution to the open character of the Green Belt, the village should be excluded from the Green Belt. If the 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.

Building on the high-level analysis of settlements' contribution to the openness of the Green Belt set out in Section 7 of the Green Belt Assessment (Part 1) (December 2015), this Part 2 Report considers the extent of the open character of Green Belt settlements within the Areas for Further Investigation that are currently "washed over" and their contribution towards the openness of the surrounding Green Belt. This test is different from the process undertaken when considering land against the Green Belt purposes. This Report essentially considers the Areas for Further Investigation against the three-stage test for inseting set out in paragraph 86 of the National Planning Policy Framework.

1. Stage 1: Does the settlement have an open character?
2. Stage 2: If yes, does the open character make an important contribution to the openness of the Green Belt?
3. Stage 3: If yes, is it necessary to prevent development for that reason?

⁷ Within the Green Belt proposed development which does not fall within one of the exceptions listed under paragraphs 89 and 90 of the NPPF 2012 constitute inappropriate development. Inappropriate development is, by definition, harmful to the Green Belt. Paragraph 88 states inappropriate development should not be approved unless there are 'very special circumstances' and these will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm, is clearly outweighed by other considerations. 'Very special circumstances' is not defined within NPPF.

Figure 1: Flowchart demonstrating three-stage test for insetting.



Those settlements that are found to be in need of protection for reasons other than their contribution to the openness of the Green Belt may be considered at a later stage (Regulation 19 stage) for “insetting”⁸ through the Local Plan process in accordance with national policy. This Part 2 Report will be recommending further consideration at the next stage as to whether or not settlements should be inset. It will not recommend that any of the Areas for Further Investigation will be inset. Settlements that are inset would no longer be washed over by the Green Belt or subject to Green Belt policies. Instead they would be subject to either general policies or where appropriate specific policies, drawn up to manage development in light of the specific circumstances and characteristics of the settlement. However, consideration of settlements as part of this Report does not necessarily mean that they will be inset and no conclusions are made to this effect, at this stage.

It should be noted that this assessment element focusses on the settlements’ contribution to the essential Green Belt characteristic of ‘openness’, rather than performance against any of the Green Belt purposes. This is because ‘insetting’ a settlement through the Local Plan process is, in policy terms, essentially a separate exercise from altering Green Belt boundaries on the basis of exceptional circumstances.

⁸ The term “insetting” is defined in the Glossary (Section 8.0 of this Report).

2.0 Study Methodology

Process

- 2.1 The Tandridge Local Plan [Green Belt Assessment Methodology](#) was agreed by Planning Policy Committee in June 2015. It set out a 3 stage assessment process, comprising the following stages.

Stage 1 Defining the assessment area: This stage includes the definition of strategic assessment areas, local assessment areas (parcels) and identification of settlements.

Stage 2 Assessment process: This stage includes the overarching strategic consideration of the Metropolitan Green Belt and the contribution the Green Belt in Tandridge makes to this, as well as the detailed assessment of the parcels against four out of the five Green Belt purposes.

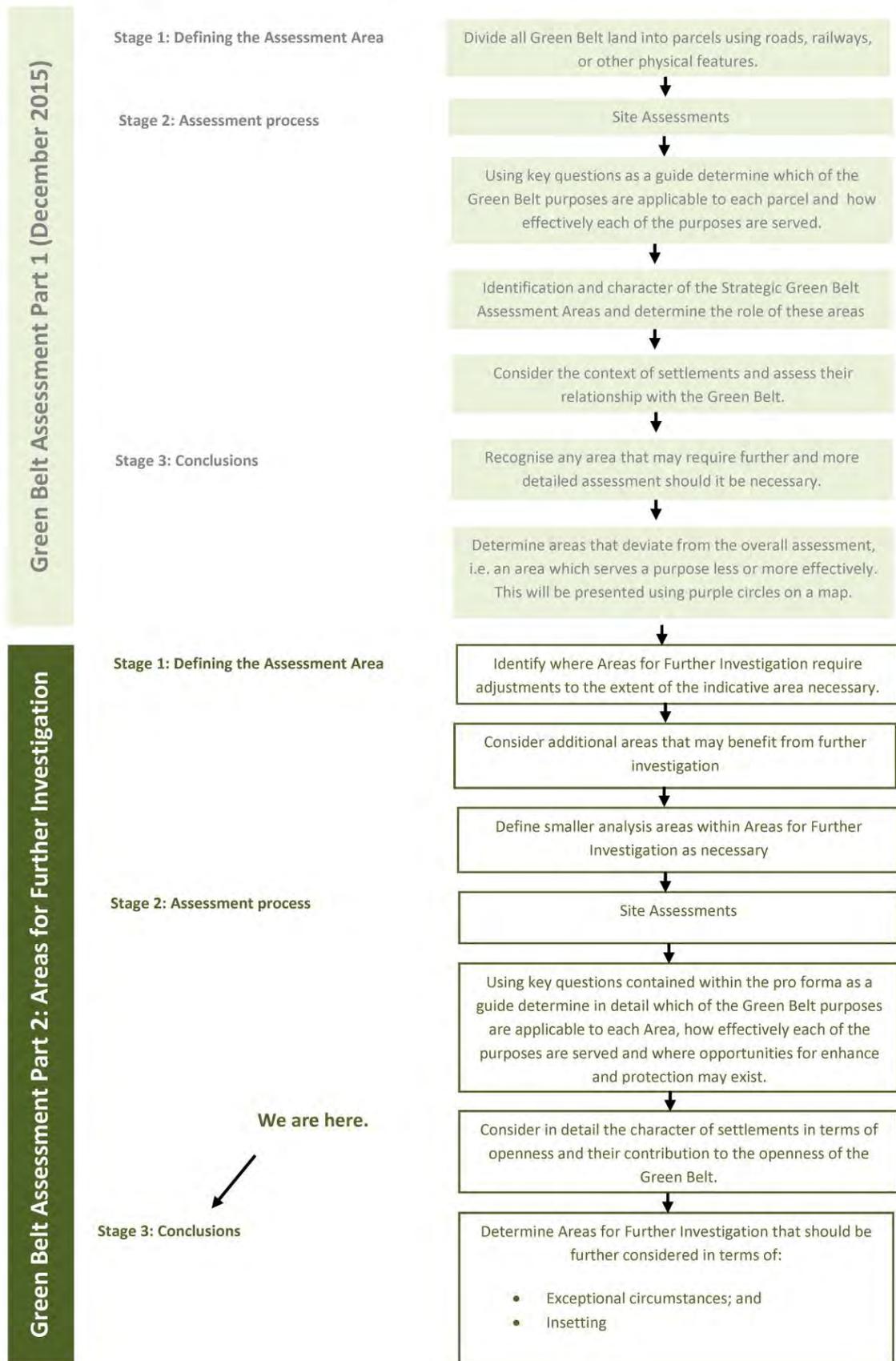
The methodology relating to the assessment of villages and settlements, in light of paragraph 86 of the NPPF, included a historic assessment focussed on settlements with high-level consideration of their contribution to openness.

Stage 3 Conclusions: This stage makes an overall conclusion as to how the parcels and strategic areas serve the wider Green Belt function, and the settlements relate to the surrounding Green Belt. In addition, this stage included the identification of Areas for Further Investigation, which are being considered within this Part 2 Report.

- 2.2 The agreed Methodology was applied in the Green Belt Assessment (Part 1) (December 2015), but deviated to some extent where it was necessary for the benefit of the assessment process. The nature of, and reasons for, deviations from the agreed Methodology were clearly identified in blue text boxes throughout the Part 1 Report.
- 2.3 The analysis set out in this Part 2 Report is carried out in response to the need for more detailed consideration of the Areas for Further Investigation that is identified in recommendations 2, 3 and 4 of the Green Belt Assessment (Part 1) (December 2015). Whilst the agreed Methodology included the identification of Areas for Further Investigation it did not set out how this Part 2 assessment should be conducted. This work will enable the Council to pursue the consideration of exceptional circumstances, or the necessity to inset settlements as the Local Plan progresses, where it is necessary to do so.
- 2.4 The methodology used in the detailed analysis of the Areas for Further Investigation in this assessment stage has been guided by and aligned with the agreed Methodology (June 2015). As such, it reflects the 3-stage approach explained in section 2.1, using the same structure, analysis approach and data gathering tools. This Part 2 Report should therefore be read in conjunction with the Green Belt Assessment (Part 1) (December 2015) and the agreed Methodology (June 2015). In addition, the approach to assessing the Areas for Further Investigation takes on board relevant comments that were made through the consultation on the Issues and Approaches document between December 2015 and February 2016, and lessons learned in carrying out the Green Belt Assessment (Part 1) (December 2015).

An updated flow diagram illustrating the assessment elements in each stage is set out at Figure 2.

Figure 2: Methodology Flow Diagram



2.5 The individual assessment elements within each stage are guided by the recommendations of the Green Belt Assessment (Part 1) (December 2015) and national Green Belt policy requirements. These are explained below. Where the methodology applied in this Report deviates from the agreed approach set out in the Methodology (June 2015) this is identified clearly and justified in a blue box throughout this Report.

Stage 1: Defining the Assessment Area

2.6 As noted in paragraph 1.13, 6 additional Areas for Further Investigation were added to the 49 Areas that were originally identified in the Green Belt Assessment (Part 1)(December 2015), bringing the total up to 54 Areas for Further Investigation⁹. These 6 additional Areas were identified:

- In response to representations made as part of the Regulation 18 consultation; and
- As part of an officer workshop considering the need for further investigation of Green Belt areas from a development management perspective;

2.7 The majority of Areas for Further Investigation are depicted with purple ovals to illustrate indicatively where the assessment area is located (see Appendix 1). This approach is taken because the role of both Part 1 and Part 2 of the Green Belt Assessment is not to identify boundaries, but to allow for investigation to take place. However, a small number of the Areas for Further Investigation are not shown indicatively and include definitive boundaries because they are located immediately adjacent to the District boundary or are bounded by built-up areas/inset settlements.

2.8 The Council recognises that the District boundary is not a physical boundary and that the Green Belt, in many instances, extends into neighbouring authority areas. The Green Belt Methodology acknowledged this and noted that officers may use vantage points from other areas to consider the wider context where applicable. However, it concluded that the Green Belt Assessment would only assesses the Green Belt within the remit of the District on the basis that it is for other Green Belt authorities to determine whether or not to undertake a Green Belt Assessment and if so, how they assess the Green Belt within their local authority areas. Therefore, for the purposes of this study, the Green Belt land considered is located within the District boundary.

2.9 The Methodology (June 2015) also acknowledges that the Council has a legal requirement to work with its neighbouring authorities and other relevant stakeholders as part of the Duty to Co-operate on strategic issues. Strategic issues for cooperation may include the Metropolitan Green Belt and the Council will seek to meet the Duty and ensure cooperation takes place throughout the plan making process.

⁹ Of note is that whilst numbers AFI 038 and AFI 042 have been joined together the numbering of the six additional Areas for Further Investigation starts from AFI 050.

- 2.10 In total 54 Areas for Further Investigation have been considered, some of which have been broken down into smaller analysis areas, with the extent of each analysis area spatially illustrated in the pro formas contained in Appendix 2 of this Report.

Stage 2: The Assessment process

- 2.11 A number of data gathering tools and data sources have been used to inform the assessment process. These are set out and explained below.

Pro forma

- 2.12 A pro forma was developed in order to guide the site visits and serve as a basis for the detailed analysis of each Area for Further Investigation. The elements and questions contained in the pro forma take account of the specific recommendations of the Green Belt Assessment (Part 1) (December 2015) and national policy requirements. The pro forma is designed to:
- A Consider the overall nature and appearance of the Area for Further Investigation, including existing land uses, topography and vegetation.
 - B Justify the identification of the Area, including whether the area is positively or negatively deviant from the purposes of the Green Belt.
 - C Enable consideration of the Area in light of applicable consultation responses received during the consultation on the Issues and Approaches Local Plan document.
 - D Identify any built form within the Area, its nature, age and relationship with the setting.
 - E Recognize the proportion and nature of undeveloped land within the Area for Further Investigation.
 - F Identify any definitive boundaries, considering whether the boundaries contain development or prevent sprawl as well as any opportunity to create a permanent boundary.
 - G Consider the Area's role in preventing coalescence and any potential implications of coalescence.
 - H Identify current land uses within the Area for Further Investigation and their relationship to the Green Belt purposes.
 - I Confirm any Conservation Area within the Area for Further Investigation, its nature, size, boundaries, setting and reasons for designation.
 - J Ascertain whether development pressures exist within the Area for Further Investigation.
 - K Consider any opportunities the Green Belt offers in the light of paragraph 81 of the National Planning Policy Framework.

Deviation from the Green Belt Assessment Methodology and the reason why

Between sections 3.18 and 4.6, the Methodology sets down the questions and factors to be considered in the assessment of the strategic areas, parcels and settlements. The pro forma is therefore a deviation, which allows for more thorough and comprehensive consideration of the Areas for Further Investigation, and it has been adjusted to the needs of the study and designed to take account of the specific recommendations set down in the Green Belt Assessment (Part 1) (December 2015) and national Green Belt policy.

Aerial photography

- 2.13 As an additional assessment tool aerial photography was used in a number of instances prior to undertaking site visits, enabling street views from different points within each Area as well as a bird's eye view. This aided the understanding of the Areas for Further Investigation, helped to break down the larger Areas into smaller analysis areas on character grounds and enabled consideration in greater detail.

GIS

- 2.14 In assessing the Areas for Further Investigation, the Council's GIS system was used as an additional assessment tool to establish the presence, siting and extent of built-up areas, larger rural settlements, Conservation Areas, Ancient Woodland and trees covered by Tree Preservation Orders in order to fully understand the relationship between them, to establish the position of boundaries or to determine whether a feature could form a definitive boundary.

Site Visits

- 2.15 Site visits were undertaken for each Area for Further Investigation by officers from the Council's Planning Policy Team.
- 2.16 A combined approach of viewing the Areas by car and on foot was undertaken to investigate Areas fully. In most instances, site visits were carried out on foot, utilising public rights of way and other available access routes. In some cases, however, it was possible to utilise topography and viewpoints to gather information and to do so by car from stopping points within and on the edge of the Areas for Further Investigation.
- 2.17 Sites within private ownership and those that were not readily visible from public points of view were accessed with the consent of the landowner or their representatives, or by utilising the Council's Rights of Entry powers. These approaches allowed access to views of the Areas from a variety of vantage points, including views from within and the edge of the Areas, enabling the identification of key features, how the Areas relate to the surrounding land and multiple opportunities to take photographic evidence.

Assessment Considerations

- 2.18 For each Area, consideration was given to its character, appearance and setting, including:

- Topography¹⁰
- The proportion of developed and undeveloped land
- The age and nature of built form/development
- Boundaries and how they are delineated (e.g. fencing, trees or hedges)
- The land use

2.19 Using the Council's GIS system and on-site observations, regard was also had to whether the Area included:

- Category 1 settlements¹¹ (existing built-up areas), category 2 settlements (larger rural settlements and Defined Villages in the Green Belt) as well as the siting of their boundaries
- Conservation Areas
- Public rights of way
- Informal use of the land by members of the public
- Ancient Woodland
- Trees covered by Tree Preservation Orders

2.20 In some instances, where information was not available or identifiable, reasonable assumptions were made. In some instances the use of land was not obvious or the age of built form could not be identified and an estimate had to be applied based on professional judgement.

2.21 In addition, the majority of Conservation Areas do not have detailed conservation area appraisals justifying the reasons for designation. Accordingly, a degree of judgement has had to be made in determining how they relate to the Green Belt.

2.22 Planning decisions within each Area for Further Investigation were reviewed in order to understand in more detail the circumstances surrounding development within them. This included consideration of:

- Whether or not development pre-dates the Green Belt designation;
- The volume and type of development that is appropriate in policy terms; and
- The volume and type of development that is inappropriate in policy terms, but has been allowed on the basis of very special circumstances that have outweighed the harm by inappropriateness and any other identified harm.

2.23 Within the 54 Areas for Further Investigation, approximately 12, 600 decisions were identified ranging from minor amendments and extensions to existing properties, through to changes of use and wholesale redevelopment. These records date back to when planning records began formal collation in 1948. Due to the significant volume of applications within the Areas for Further Investigation, it has been necessary to focus the review on those most relevant to gaining an understanding of the nature,

¹⁰ Whilst it is acknowledged that topography is essentially a landscape consideration rather than a consideration in defining Green Belt, it can make a contribution to the character of an Area and is therefore taken account of as part of this Green Belt Assessment.

¹¹ Category 1 and 2 Settlements are listed under Policy CSP 1 of the Tandridge District Core Strategy 2008.

history and justification for existing development within the Green Belt. For this reason refused planning applications, listed building consents, advertisement consents, Tree Preservation Orders, adjoining authorities' consultations and prior approvals were excluded from the review. In addition, officer judgement has been applied in identifying the most relevant applications that would be indicative of how the Green Belt purposes had been served (and/or are still being served) in a specific location.

Previous Consultation

- 2.24 As indicated in section 1.3 of this Report, a Regulation 18 consultation was carried out on the Local Plan Issues and Approaches document between December 2015 and February 2016. As part of the consultation, public comment was invited on the evidence base documents, including the Green Belt Assessment (Part 1) (December 2015).
- 2.25 Approximately 5,200 comments were received over the course of the consultation on the Issues and Approaches document, including those which are relevant to the Green Belt Assessment (Part 1) (December 2015) and the agreed Methodology (June 2015). Of the comments received on the Green Belt documents over 100 related directly to the Areas for Further Investigation. Key issues raised through consultation responses relevant to the Areas for Further Investigation have been included in the pro formas, which are contained in Appendix 2. This has enabled the detailed consideration of the Areas for Further Investigation in light of representations received as part of the site visit and throughout the assessment of the Areas. Responses in relation to the Green Belt Assessment have informed the conclusions of this Part 2 Report, as appropriate. For this reason the Green Belt Assessment (Part 1) (December 2015) will not be revised. Instead the comments received have assisted the evolution of the assessment process in an iterative way.

Additional Areas

- 2.26 Some of the consultation responses highlighted Areas, which were suggested for further consideration and detailed assessment. These have been added into the study area, adding four new Areas for Further Investigation (AFI 050, AFI 051, AFI 052 and AFI 053).
- 2.27 A further 2 Areas were additionally included as a result of the officer workshop considering the need for further investigation of Green Belt areas from a development management perspective as explained in paragraph 2.6 of this Report (AFI 054 and AFI 055).
- 2.28 The additional Areas for Further Investigation coincide with parcels which had already been assessed as part of the Green Belt Assessment (Part 1) (December 2015) and were ruled out from further consideration as they were considered to serve the Green Belt purposes effectively. Therefore, only the specific parts of the original parcels suggested by the consultation responses or identified as part of the officer workshop were re-visited.

Removal of Areas

- 2.29 Although comments were also received requesting the removal of certain Areas for Further Investigation, the Council consider it prudent to assess Areas in as much detail as possible and utilise the findings to guide the process, rather than to remove

Areas from consideration in the absence of detailed evidence. It will be through this Part 2 Report and the assessment process that any Areas will be discounted from further consideration in Part 3 of the Green Belt Assessment, in accordance with the methodology and in a consistent manner.

Other issues raised

- 2.30 Consultation responses included comments relating to the Green Belt purposes served by the Areas for Further Investigation and how well they are served, recommending in some instances either strong protection or removal from the Green Belt.
- 2.31 Responses also identified where they felt errors had been made in the Part 1 process and these have been noted and addressed where possible.
- 2.32 Minor textual errors/inaccuracies have been registered and, where possible, addressed as part of the detailed site analysis contained within the pro formas. Additional information and/or points raised were noted when undertaking site visits and when looking at the planning history of the areas. Further information relating to how the Council has considered the representations made to the Issues and Approaches consultation is set out in the Statement of Consultation (2016).

Stage 3: Conclusions of this study

- 2.33 This Part 2 Report presents the findings of the detailed analysis of 54 Areas for Further Investigation. On the basis of the detailed analysis carried out, this Report identifies any Areas to be considered in Part 3 of the Green Belt Assessment through the Local Plan process. The conclusions of this Report are two-fold.
 - 1. The identification of Areas to be considered in Part 3 in terms of whether or not exceptional circumstances exist which may justify changes to Green Belt boundaries through the Local Plan in line with paragraph 83 of the NPPF.
 - 2. The identification of Areas to be considered in Part 3 that include settlements within the Green Belt, which require protection for reasons other than their contribution to openness and may be considered through the Local Plan process in terms of whether or not they should be inset.
- 2.34 It should be emphasised that this Part 2 Report does not recommend specific changes to existing boundaries or 'insetting' of Green Belt settlements. These are matters for the Local Plan process to consider and are outside the scope of this Green Belt Assessment.
- 2.35 In recommending Areas to be considered in Part 3 in terms of exceptional circumstances, and settlement suitability for 'insetting' at the Regulation 19 stage, this Part 2 Report rules out all remaining Areas for Further Investigation on Green Belt grounds. These Areas will no longer be considered as part of the Green Belt Assessment. However, they may still be considered through the Local Plan process in terms of exceptional circumstances that may justify release from the Green Belt on the basis of evidence considerations other than the Green Belt Assessment. Accordingly, where exceptional circumstances are being determined through the

Local Plan on the basis of other evidence base considerations, these would not include the conclusions of this Green Belt Assessment.

- 2.36 Of note is that recommendation 2 of the Green Belt Assessment (Part 1) (December 2015) stated further work would be undertaken to understand areas which serve the Green Belt purposes more effectively and to ensure they are protected and enhanced where necessary. Given that paragraph 81 of the NPPF makes it clear that once the Green Belt has been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, opportunities for enhancement can only be considered at the next the stage in the process.
- 2.37 Whilst additional protection has been considered for those Areas that have been identified in the Part 1 Report, such as for example the area of land separating Tatsfield from Biggin Hill (AFI 010), it has been concluded that no stronger protection than the Green Belt is either necessary or possible. The Green Belt designation should secure protection and, even if challenged, would be defensible on appeal.

Critical review

- 2.38 This Report was reviewed by a critical friend in August 2016. The critical review was carried out by Mole Ember Ltd who considered compliance with the methodology and identified clarification or amendments which would be helpful.
- 2.39 A report was prepared, setting out the findings and conclusions of the critical review. These have been fully taken account of in revising this Green Belt Assessment (Part 2): Areas for Further Investigation (October 2016). The critical friend report is available on the Council's website.

3.0 Further Areas for Investigation – Assessments

- 3.1 As set out in paragraph 2.6, 54 Areas for Further Investigation were considered in detail on the basis of site visits. For each Area, a pro forma was completed to help reach an overall conclusion about the Area.
- 3.2 This section of the report summarises the findings from the detailed analysis of each Area for Further Investigation. The detailed assessments are contained in Appendix 2.

Findings

- 3.3 The findings relating to the 54 Areas for Further Investigation fall into three different categories:
1. Areas that should be considered further in Part 3 in terms of whether or not exceptional circumstances exist.
 2. Settlements that require protection for reasons other than their contribution to openness and are recommended for further consideration in Part 3 in terms of whether or not they should be inset through the Local Plan.
 3. Areas that are recommended not to be considered further as part of the Green Belt Assessment process.

Areas that should be considered further in terms of whether or not exceptional circumstances exist

3.4 A small number of Areas to be considered in Part 3 are identified. These are recommended to be considered further through the Local Plan process in terms of whether or not exceptional circumstances exist to justify alteration of the Green Belt boundary. These are Areas:

- With a sense of enclosure or containment; or
- With significant levels of development, including commercial and industrial development

3.5 These Areas are not considered to support the fundamental characteristic of openness or serve the national Green Belt purposes¹² effectively.

Settlements that require protection for reasons other than their contribution to openness and are recommended for further consideration in terms of inseting through the Local Plan

3.6 Section 4.0 of the Methodology lists Defined Villages in the Green Belt¹³ and other Green Belt settlements, which were considered as part of the Green Belt Assessment (Part 1) (December 2015). Those recommended for further consideration as part of the Green Belt Assessment (Part 1) (December 2015) were not considered to have an open character when assessed at a high level.

3.7 On the basis of more detailed assessment of those settlements in terms of open character and their contribution to the openness of the surrounding Green Belt, the Defined Villages and a number of settlements are recommended for further consideration in terms of whether or not they should be inset through the Local Plan process. These are mostly quite densely developed and comprise significant concentrations of built form; and as a result are considered to make a limited contribution to openness.

Areas which should not be considered any further

3.8 Based on observations made during the site visits, the assessment process and consideration of the planning history, it is concluded that a significant number of the Areas for Further Investigation serve one or more of the national purposes effectively and as such are not being recommended for further consideration as part of the Green Belt Assessment. Accordingly, Areas within this category will not be considered further in terms of exceptional circumstances or inseting as part of the Green Belt Assessment process. However, they may be considered further in terms of exceptional circumstances as part of the Local Plan process. These primarily include Areas abutting the District's boundaries and those relating to Conservation Areas. In most cases, it has been concluded that they serve the Green Belt purposes effectively.

3.9 Areas with development that post-dates the Green Belt designation, but is defined in paragraph 89 of the NPPF as appropriate development in the Green, such as

¹² Listed at paragraph 1.1 of this Report.

¹³ The term "Defined Village in the Green Belt" is defined in the Glossary (Section 8.0 of this Report).

minerals extraction, limited infill, replacement buildings or outdoor sports facilities, are also excluded from further consideration.

4.0 Areas for Further Investigation: Exceptional Circumstances

- 4.1 This section identifies Areas to be considered in Part 3 for further consideration as part of the Green Belt Assessment in terms of exceptional circumstances. The Areas recommended are indicative only, in that they broadly indicate a location but do not have defined boundaries. This is because boundaries can only be defined through the Local Plan process in the event that exceptional circumstances can be demonstrated. This section should be read alongside the parcel and settlement assessments set out in the Green Belt Assessment (Part 1) (December 2015).
- 4.2 It should be stressed that the identification of Areas for Further Investigation in this section does not mean that the Area will be removed from the Green Belt or developed. The purpose of identifying these areas is to enable further consideration in terms of exceptional circumstances and to determine how they may be considered as part of the Local Plan process.
- 4.3 The Areas to be considered in Part 3 are set out in Table 1, alongside a reference number and a summary of the reason why they should be considered in terms of exceptional circumstances. In addition they are illustrated on maps 1-4 in section 6 of this Report.

Table 1 Areas to be considered in Part 3 in terms of exceptional circumstances

REF No	Area/Location	Summary of Reasons
AFI 002	Farleigh Road/ Warlingham	<p>The high level analysis of parcel GBA 001 in the Green Belt Assessment (Part 1) (December 2015) considered that a reduction in this small strip of Green Belt would compromise the character and separation of the large inset area of Warlingham and the small inset area along the north end of Farleigh Road and that it is extremely effective in preventing towns from merging.</p> <p>Overall, the detailed analysis of the Area for Further Investigation confirms this conclusion. However, a section in the south-west of the Area is considered to serve Green Belt purposes 1, 2 and 3 with limited effectiveness. It is bounded by built form on three sides with a scaffolding yard set within it. This south-western section within the Area for Further Investigation is considered to serve the Green Belt purposes with limited effectiveness due to its location, scale and its relationship with the surrounding built form. Furthermore, there is a sense of containment due to the siting of built form and topography. Therefore, it is recommended that the south-western section within Area for Further Investigation 002 is considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist. The remainder of this Area for Further Investigation is not recommended to be considered further as part of the Green Belt Assessment.</p>
AFI 007 (a)	Hamsey Green and Warlingham Schools and Caravan Park	<p>Parcel GBA 002 in the Green Belt Assessment (Part 1)(December 2015) was identified as having been built-up over the years, with the school appearing to constitute sprawl from the adjoining urban area.</p> <p>AFI 007 (a): This area includes the original Warlingham School building, which pre-dates the Green Belt. However, the school has been subject to a number of extensions and due to the extent of built form, much of which has been allowed on the basis of very special circumstances post-dating the Green Belt designation, this section of the Area for Further Investigation does not have an open character. In addition, the Green Belt in this section is not considered to serve the purposes of preventing sprawl, safeguarding from encroachment or preventing settlements from merging. It is therefore recommended this section of Area for Further Investigation 007 should be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist. The remainder of this Area for Further Investigation 007, with the exception of section AFI 007 (b) as explained below, is not recommended to be considered further as part of the Green Belt Assessment.</p>
AFI 007 (b)	Hamsey Green and Warlingham Schools and Caravan Park	<p>AFI 007 (b): To the far south of this Area for Further Investigation is a section which is bounded by development along Shelton Avenue, Hillbury Road and along The Green. This results in a sense of containment within this section. As a result of the layout of existing development, this section of the Area for Further Investigation is not considered to serve the purposes of preventing sprawl, safeguarding from encroachment or preventing settlements from merging. Whilst it is acknowledged that some of this section provides public benefits, it is not considered to serve the purposes of including land within the Green Belt and it is recommended to be considered further as part of the Green Belt Assessment. The remainder of this Area for Further Investigation, with the exception of section AFI 007 (a) as explained above, is not recommended to be considered further as part of the Green Belt Assessment.</p>

AFI 008	Strip of Green Belt that separates Caterham on the Hill/Caterham Valley and Whyteleafe	<p>This Area for Further Investigation is identified in the parcel assessment of GBA 004 set out in the Green Belt Assessment (Part 1)(December 2015) as a buffer between Caterham Valley, Caterham on the Hill and Whyteleafe, which in part serves to prevent sprawl from the London Boroughs.</p> <p>Except land accommodating Queens Park, which forms part of analysis area 5, the remainder of this Area for Further Investigation serves the Green Belt purposes well and should be ruled out from further consideration as part of the Green Belt Assessment. The Queens Park area however is not considered to serve the purposes of including land within the Green Belt. It is sited between built form that is located in Caterham on the Hill and therefore does not serve to prevent settlements from merging. Being bounded by built-up areas to the north, south and west, it also does not prevent sprawl. Whilst countryside by definition, it has the character and appearance of an urban park, which together with its siting bounded by urban development results in sense of enclosure and containment. It is therefore not considered to serve the purpose of safeguarding from encroachment. As such, the land accommodating Queens Park is recommended to be considered further as part of the Green Belt Assessment, whilst the remainder of the Area for Further Investigation is ruled out from further consideration as part of the Green Belt Assessment.</p>
AFI 009	West of A22, East of Longsdon Way, Caterham	<p>This Area for Further Investigation coincides with parcel GBA 005 considered in the Green Belt Assessment (Part 1) (December 2015). The high-level assessment acknowledges that the Green Belt in this location plays a role in preventing sprawl from Caterham and Warlingham, but considers this part of the parcel as an anomaly requiring further consideration to identify why it has prevented sprawl when a more definitive boundary is available.</p> <p>Analysis area 1 comprises the southernmost section of this Area for Further Investigation sited to the west of the A22 and is shown on the map attached to the pro forma. This analysis area is isolated from the wider Green Belt, small in scale and remains undeveloped. Whilst it has served to contain development, due to its siting, scale and relationship with the urban area as well as the siting of the A22 along its eastern edge, this section of the Area is not considered to serve the purposes of preventing sprawl and safeguarding from encroachment. Given the substantial separation from other settlements and distance from Conservation Areas, it does not serve purposes 2 and 4 of including land within the Green Belt either. Being bounded by built form, including the A22, there is a sense of enclosure and containment that undermines the open character of the southernmost section of this Area for Further Investigation. As such, it is recommended that this section be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist. The remainder of the Area for Further Investigation is to be excluded from further consideration as part of the Green Belt Assessment.</p>
AFI 013	Clacket Lane Services	<p>This Area for Further Investigation spans GBA parcels 013 and 019 as identified in the Green Belt Assessment (Part 1) (December 2015), including the M25 and the Clacket Lane Service Station.</p> <p>The Motorway Service Station post-dates the Green Belt designation and was permitted on the basis of very special circumstances. Due to its scale, location on both sides of the motorway and the nature of its use, it serves none of the purposes of including land within the Green Belt and compromises the safeguarding of the countryside from encroachment. In addition, it contains substantial development, which undermines the open character of the Green Belt in this location and its contribution to the openness of the surrounding Green Belt. Therefore, this Area is recommended for further</p>

		consideration as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist.
AFI 020	Moorhouse Tileworks	<p>This Area for Further Investigation formed part of GBA parcel 019 identified in the Green Belt Assessment (Part 1) (December 2015) and includes the sandpits and Tileworks that make up a large proportion of the parcel.</p> <p>Whilst the Tileworks pre-date the Green Belt designation, these have been subject to further development since the Green Belt was designated with resulting impact on the countryside. Given their siting, scale, use and relationship with settlements/built-up areas, they are not considered to serve any of the purposes of including land within the Green Belt. Although development is mostly contained within the site's original envelope, the site does not contribute to the openness of the surrounding Green Belt and, as such it is recommended that it should be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist.</p>
AFI 032	Lambs Business Park	<p>The Green Belt Assessment (Part 1)(December 2015) identifies this Area for Further Investigation due to the significant concentration of development and resulting encroachment upon the countryside.</p> <p>Due to the scale of development, its siting and commercial/industrial use, this Area for Further Investigation is not considered to serve purposes 1, 2 and 4 of including land within the Green Belt. Whilst the Area for Further Investigation is located within the countryside, the Business Park is a Strategic Employment Site with a quarry located on the western edge of the site outside the boundaries of the strategic employment designation, and as such is not considered to safeguard the countryside from encroachment. Although development is contained, the Area has a developed appearance, which undermines the open character of the Green Belt. Accordingly, it is recommended that it should be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist.</p>
AFI 035	NCYPE School	<p>The Green Belt Assessment (Part 1)(December 2015) identifies this as an Area for Further Investigation within GBA parcel 045, concluding that the school represents a prominent feature in the countryside.</p> <p>This Area for Further Investigation comprises a school with residential accommodation and a substantial amount of ancillary development. Many of its buildings pre-date the Green Belt designation, but it is evident that there has been significant development since then permitted on grounds of very special circumstances. Due to its siting, scale and the use of land within this Area, it is not considered to serve the purposes of preventing sprawl or settlements from merging nor does it serve the purpose of preserving the character or setting of a Conservation Area. Whilst the Area is located in the open countryside, it has been subject to significant development and as such it has not served to safeguard the countryside from encroachment, although the development is largely contained within the school site's envelope. In addition, the extent and layout of existing development results in a sense of containment within the Area of Further Investigation that does not support the open character of the Green Belt. For these reasons, this Area for Further Investigation is recommended for further consideration of whether or not exceptional circumstances exist as part of the Green Belt Assessment.</p>
AFI 039	Land near Green Lane	The assessment of parcel GBA 040 in the Green Belt Assessment (Part 1)(December 2015) identifies large prominent buildings within the countryside, along Green Lane, comprising industrial units at Mushroom Farm and Gatwick off-airport parking at Westlands Farm.

		<p>The detailed analysis of this Area for Further Investigation identifies development in this Area, including other commercial sites, residential properties and mobile homes which post-date the Green Belt designation. A number of these sites have been subject to post-Green Belt permissions based on the grounds of very special circumstances, such as the off-airport parking at Westlands Farm and the gypsy and traveller pitches on Green Lane. Given its location, it is not considered that this Area for Further Investigation serves to prevent the sprawl from built-up areas or the merging of settlement. Whilst it is open countryside by definition, the Area does not have an open character and undeveloped appearance as a result the built form contained within it. In addition, development has clearly extended outwards and on this basis, it is considered that the Green Belt in this Area has failed to safeguard the countryside from encroachment. Accordingly, it is recommended that this Area be considered further in terms of whether or not exceptional circumstances exist as part of the Green Belt Assessment.</p>
AFI 043	Hobbs Industrial Estate	<p>The assessment of parcel GBA 041 in the Green Belt Assessment (Part 1) (December 2015) concludes that substantial parts of the countryside within this Area for Further Investigation have been encroached upon by the presence of development, comprising numerous large units and warehouses.</p> <p>The detailed assessment of this Area for Further Investigation confirms the conclusion reached through the high level analysis. The Area is not considered to serve the purposes of including land within the Green Belt. Due to the location, use and scale of development within the Area, it neither prevents sprawl from built-up areas, nor settlements from merging and does not preserve the setting of any Conservation Areas. The industrial estate is not defined as countryside, and accordingly does not serve to safeguard from encroachment, however it is bounded by land that appears to constitute countryside and this does serve this purpose.</p> <p>Furthermore, the Area has been the subject of significant development pressure, much of it permitted in accordance with policies relating to its designation as a Strategic Employment Site and as a result it does not have an open character. Given the conclusions regarding how it serves the purposes, it is recommended that this Area for Further Investigation is considered further in terms of whether or not exceptional circumstances exist as part of the Green Belt Assessment.</p>
AFI 049	North of Caterham on the Hill	<p>This Area for Further Investigation coincides with parcel GBA 047 as identified in the Green Belt Assessment (Part 1) (December 2015), which concludes that the parcel does not serve any of the purposes of the Green Belt. Furthermore, it is identified as being of different character from adjoining land, with a visual and physical separation.</p> <p>The detailed analysis of this Area for Further Investigation concurs with the conclusion reached through the high level analysis. Area 049 is enclosed by development within the District, resulting in a sense of containment and it appears visually distinct and as such does not benefit from the openness of the adjoining Common in Croydon; as a consequence it is not considered to contribute towards openness. Based on the conclusions regarding the Green Belt purposes it is recommended that it be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist.</p>

AFI 054	The Plantation, West Park Road	<p>The Area for Further Investigation coincides with parcel GBA 041 considered as part of the high-level analysis in the Green Belt Assessment (Part 1)(December 2015). However, the Part 1 assessment did not identify this as an Area for Further Investigation, and states in section D.42.1 that it is a large site used by travelling show people.</p> <p>This Area for Further Investigation comprises a travelling show peoples' ground in addition to a number of gypsy and traveller pitches. Due to the extent of development, its location and distance from the nearest Conservation Area, it is not considered to prevent sprawl and merging of settlements, nor does it preserve the setting or special character of a Conservation Area. Traveller development post-dates the Green Belt and has been permitted on grounds of very special circumstances. Being unconnected to any settlement, development has resulted in encroachment and represents a stark contrast to the openness of the surrounding countryside. Furthermore, whilst built form is low-rise, the extent of the traveller site and the density of development within, compromises the openness of the Green Belt in this location. Accordingly, it is recommended that this Area for Further Investigation is considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist.</p>
--------------------	---	--

5.0 Areas for Further Investigation: Settlements to be considered for inseting

5.1 This section identifies the settlements that will be considered in Part 3 in terms of whether or not they should be inset.

Table 2 Settlements to be considered in Part 3 in terms of inseting.

REF No	Area/Location	Summary of Reasons
AFI 010	District Boundary with Bromley (Adjoining Biggin Hill) and including Tatsfield	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1) (December 2015) concludes that there is a considerable amount of built form within the village which impacts on the openness of the Green Belt.</p> <p>The detailed assessment of this settlement concurs with this conclusion. Due to the amount, extent and density of development/built form within the Defined Village in the Green Belt, the settlement is not considered to have an open character which makes a positive contribution to the openness of the Green Belt. Therefore, the area which comprises the Defined Village is recommended for further consideration as part of the Green Belt Assessment in terms of whether or not it should be inset.</p>
AFI 017	Godstone	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1) (December 2015) identifies a considerable amount of built form in Godstone, and concludes that it has become more developed in character as it has been built up over the years and is self-contained.</p> <p>The detailed assessment of this settlement confirms this conclusion. Godstone is a Defined Village in the Green Belt and whilst it is a Semi-Rural Service Settlement¹⁴, it is a large village containing a notable amount of development, with large proportions of it in depth, such that it is, in parts, semi-urban in character.</p> <p>The extent of the village, its layout and relatively high density are such that it does not convey an open character and whilst there is an open area at its historic core, this is entirely contained by built form. Beyond the boundaries of the Defined Village, development is more sporadic and interspersed by fields and makes some contribution to the openness of the surrounding Green Belt. Accordingly, the Defined Village is recommended for further consideration as part of the Green Belt Assessment in terms of</p>

¹⁴ As set down in the Tandridge District Settlement Hierarchy (November 2015).

		whether or not it should be inset.
AFI 023	Southern half of Old Oxted (south of A25)	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1) (December 2015) identifies this Area as being built-up and centred on the Conservation Area.</p> <p>Old Oxted is a Defined Village in the Green Belt located in very close proximity to Oxted. It has a core of dense and tightly packed built form. Whilst density gradually reduces beyond the historic core, within its boundaries, the Defined Village does not exhibit an open character. This is due to development density, the extent of the area within the boundaries and the concentration and layout of built form. Beyond the boundaries of the Defined Village, development becomes more sporadic and makes a greater contribution to the openness of the surrounding Green Belt. As such, this Area is recommended for further consideration in terms of whether or not it should be inset as part of the Green Belt Assessment.</p>
AFI 024	South Godstone	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1)(December 2015) considers that this settlement contains a substantial concentration of development in the Green Belt and the surrounding countryside.</p> <p>This is a well contained village, which is largely built-up and designated as a Defined Village in the Green Belt. Due to the extent of the village, development density and the layout of built form, it is not considered to have an open character. There is a clear demarcation and change in character between the village and the open and undeveloped land surrounding it. In light of this, it is not considered to contribute to the openness of the Green Belt. As such the area of land within the Defined Village boundaries is recommended for further consideration in terms of whether or not it should be inset as part of the Green Belt Assessment.</p>
AFI 026	Bletchingley	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1)(December 2015) identified three areas in this settlement with different characters, settings and relationships with the Green Belt. The overall conclusion was that it felt open due to open spaces, views of the countryside and an appearance of limited built form. The detailed analysis considers the settlement against the three-stage test for inseting and as this Area includes a Conservation Area, it considers the Green Belt land beyond the Defined Village boundaries against the Green Belt purposes.</p> <p>The three-stage test for inseting has been undertaken in relation to the part of Bletchingley, which is designated as a Defined Village in the Green Belt. Bletchingley's layout comprises three clusters of development which extend along the A25. The central cluster, extends to either side of the A25, and comprises the historic core with a mixture of residential and non-residential uses. Whilst the outer clusters of development (located east and west of the central cluster) predominantly comprise residential development in depth which is located primarily either to the north or south of the A25 and which in a large part dates from the inter- and post-war periods. These clusters contain notable concentrations of development and as a result of the overall extent of the Defined Village, its layout, density and the amount of built form, it has been concluded that it does not have an open character.</p>

		<p>The central cluster of development contained within the Defined Village boundary is located within the Bletchingley Conservation Area. However, the Conservation Area boundaries encompass land to the north and south of the Defined Village. It is considered that the Green Belt beyond the Defined Village boundaries serves to protect the setting and special character of the Conservation Area centred on the village's historic core. The Green Belt surrounding the Defined Village has ensured the tight linear form has been retained by preventing further sprawl, most notably to the north, east and south. It has also served to prevent encroachment upon the countryside, which contributes towards the Conservation Area's setting and it has ensured that the built-up parts of Bletchingley do not merge.</p> <p>Accordingly it is recommended that further consideration be given in terms of whether or not the Defined Village should be inset as part of the Green Belt Assessment. Land beyond the Defined Village boundaries is not recommended for further consideration as part of the Green Belt Assessment.</p>
AFI 029	Nutfield	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1) (December 2015) identifies a concentration of development in this settlement.</p> <p>The detailed analysis concurs with this conclusion. The Area is a relatively small village in the Green Belt, although it is not designated as a Defined Village. Its layout involves development on either side of the A25, some of which extends in depth to either side of the A25. Whilst small in extent, the layout and density of built form along the A25 results in a sense of containment and as such the core of the village is not considered to be open in character. Land within the core (between development on the west side of Parkwood Road to the cluster of development to the east of Church Hill and Cooper's Hill Lane) is mostly built-up and not considered to contribute to the openness of the Green Belt. Development becomes less dense, more interspersed and sporadic beyond this and increasingly makes a contribution to the openness of the surrounding Green Belt. Accordingly it is recommended that further consideration be given as part of the Green Belt Assessment to the more built-up core of the village in terms of whether or not it should be inset.</p>
AFI 030	South Nutfield	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1) (December 2015) concludes that there is a concentration of development in South Nutfield, which does not have an open character.</p> <p>The detailed analysis confirms significant levels of development in this Defined Village in the Green Belt. Whilst it is semi-rural in appearance, the village is comprised of much built form and dense housing. Within its boundaries, the Defined Village is not considered to be open in character and therefore makes little contribution to the openness of the surrounding Green Belt. It is therefore recommended that this Area for Further Investigation be considered further as part of the Green Belt Assessment in terms of whether or not it should be inset.</p>

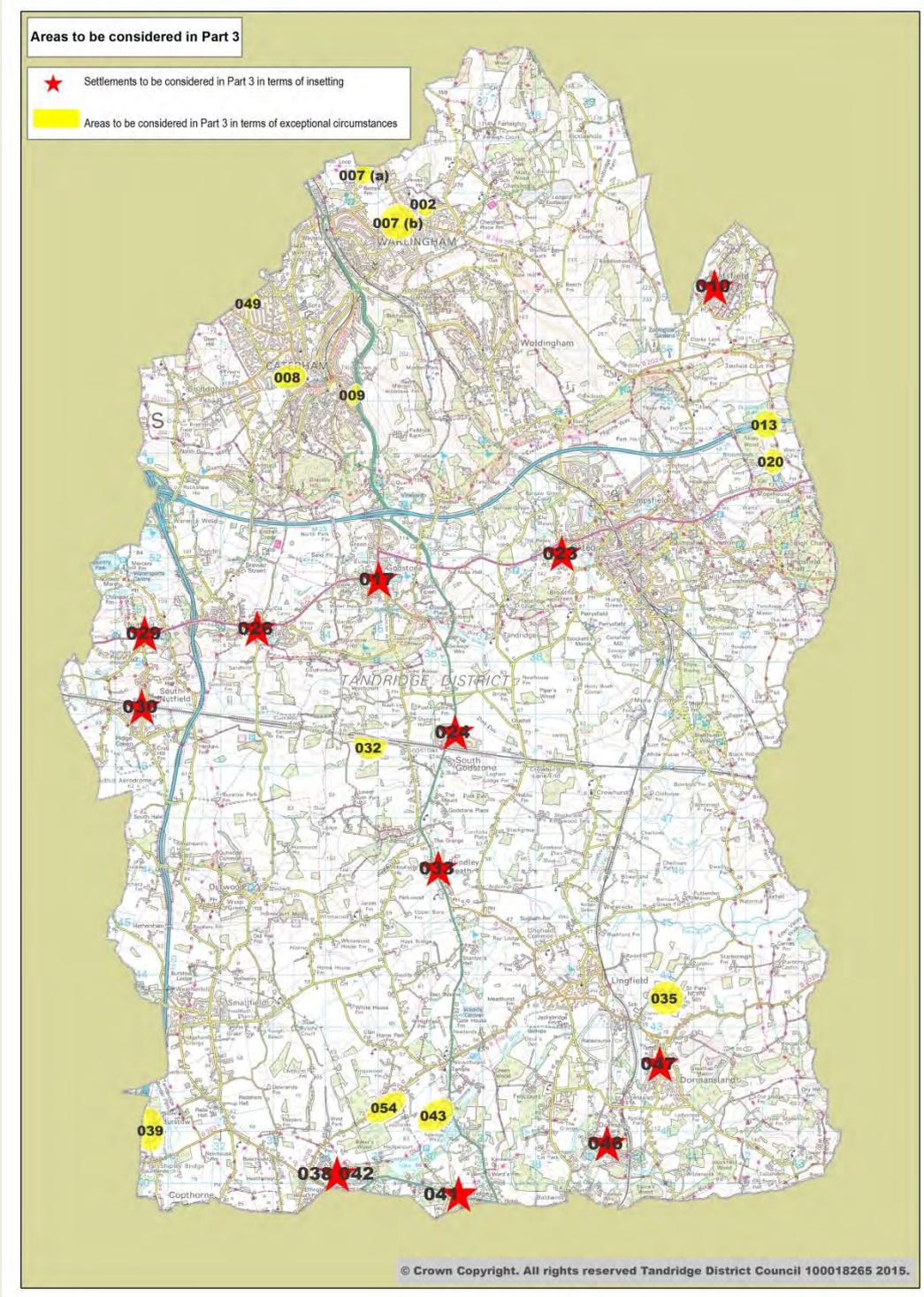
REF No	Area/Location	Summary of Reasons
AFI 033	Blindley Heath	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1) (December 2015) identifies notable levels of development which range in size and prominence within this village.</p> <p>This is a large village, where built form extends beyond the boundaries of the Defined Village in the Green Belt designation. Whilst it is semi-rural in appearance, it extends along a relatively long stretch of the A22 with reasonably dense built form which extends in varying depths either side of the main highway, which obscures the landscape beyond.</p> <p>Development beyond these boundaries becomes more sporadic and less dense, with fields and open and undeveloped land becoming more of a feature. Land within the Defined Village boundaries does not contribute to openness. For these reasons it is recommended that the Defined Village be considered further as part of the Green Belt Assessment in terms of whether or not it should be inset.</p>
AFI 038/042	District Boundary with Mid Sussex (Cophthorne)/Domewood	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1) (December 2015) concludes that Domewood cumulatively impacts on openness and encroaches upon the countryside.</p> <p>Overall, this Area for Further Investigation is large and includes Domewood, a private residential estate in the Green Belt. Whilst comprising spacious and low density development, by reason of its extent and layout land within Domewood is not considered to have an open character. As a settlement, it is reasonably well contained with built form mostly facing inwards. A number of properties back onto the open countryside, providing a degree of transition to the surrounding open land, which is facilitated by the Area's topography. However, overall this settlement is not considered to make a positive contribution to the openness of the Green Belt. It is therefore recommended that Domewood be considered further in terms of whether or not it should be inset as part of the Green Belt Assessment.</p>
AFI 041	District Boundary with Mid Sussex (Adjoining East Grinstead, including Felbridge).	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1)(December 2015) identifies a large concentration of development within this Area for Further Investigation that cumulatively impacts on openness.</p> <p>Overall, this Area for Further Investigation is considered to serve the Green Belt purposes well and should not be considered further as part of the Green Belt Assessment. However, the land contained in analysis area 1 includes Felbridge a Defined Village, which abuts development contained in the adjoining district, and due to its layout, density and extent of development does not exhibit an open character which contrasts with the surrounding fields and wooded areas. On this basis, it is recommended that the Defined Village within analysis area 1 is considered further in terms of whether or not it should be inset. The remainder of this Area for Further Investigation should not be considered further as part of the Green Belt Assessment.</p>

REF No	Area/Location	Summary of Reasons
AFI 046	Dormans Park	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1)(December 2015) concludes that there is a notable amount of development within the countryside in this location. The extent of the built form here differentiates itself, in character, from the more rural and open surrounds.</p> <p>This settlement comprises a private residential estate of relatively large dwellings with a spacious and low density layout. However, the extent of this Area in addition to the layout of built form and the amount of development within it does not result in an open character in this location and it is not considered to contribute to the openness of the surrounding Green Belt. It is therefore recommended that this Area be considered further in terms of whether or not it should be inset.</p>
AFI 047	Dormansland	<p>The high-level settlement analysis contained in the Green Belt Assessment (Part 1) (December 2015) identifies a substantial concentration of development and its encroachment upon the countryside.</p> <p>Dormansland is a Defined Village in the Green Belt, which has a semi-rural appearance. However, it is not insignificant in size and development is dense. It is therefore considered that this Area for Further Investigation does not have an open character. Whilst it is reasonably well contained, with limited sporadic development beyond the Defined Village boundaries, the land within the Defined Village boundaries is not considered to make a positive contribution to the openness of the Green Belt. Although beyond the boundaries, the more sporadic built form makes some contribution towards openness. It is therefore recommended that this Area be considered further in terms of whether or not it should be inset.</p>

6.0 Conclusions and recommendations

6.1 Map 1 below provides an overview of all Areas to be considered in Part 3, including settlements that are recommended to be carried forward and considered through the Local Plan process.

Map 1 Overview map of Areas to be considered in Part 3



- 6.2 Some Areas to be considered in Part 3 are carried forward in a reduced extent. This means in some instances only part of the Area for Further Investigation considered in this Part 2 Report is recommended to be considered in Part 3. Maps 2, 3 and 4 illustrate these Areas to be considered in Part 3 at a larger scale.
- 6.3 Areas that are not recommended to be considered in Part 3 will not be considered further as part of the Green Belt Assessment process. It is concluded that these Areas effectively perform against the Green Belt purposes. However, this does not mean that they will not be considered further as part of the Local Plan process and may still be considered for exceptional circumstances on the basis of other evidence base considerations, although these would not include Green Belt considerations.
- 6.4 Two recommendations are made for Part 3 of the Green Belt Assessment. Recommendations 1 and 2 are carried forward from the Part 1 report (Recommendations 5 and 6 of the Part 1 report) because the determination of exceptional circumstances and inseting fall outside the scope of this report.

Recommendation 1: Establish whether exceptional circumstances exist

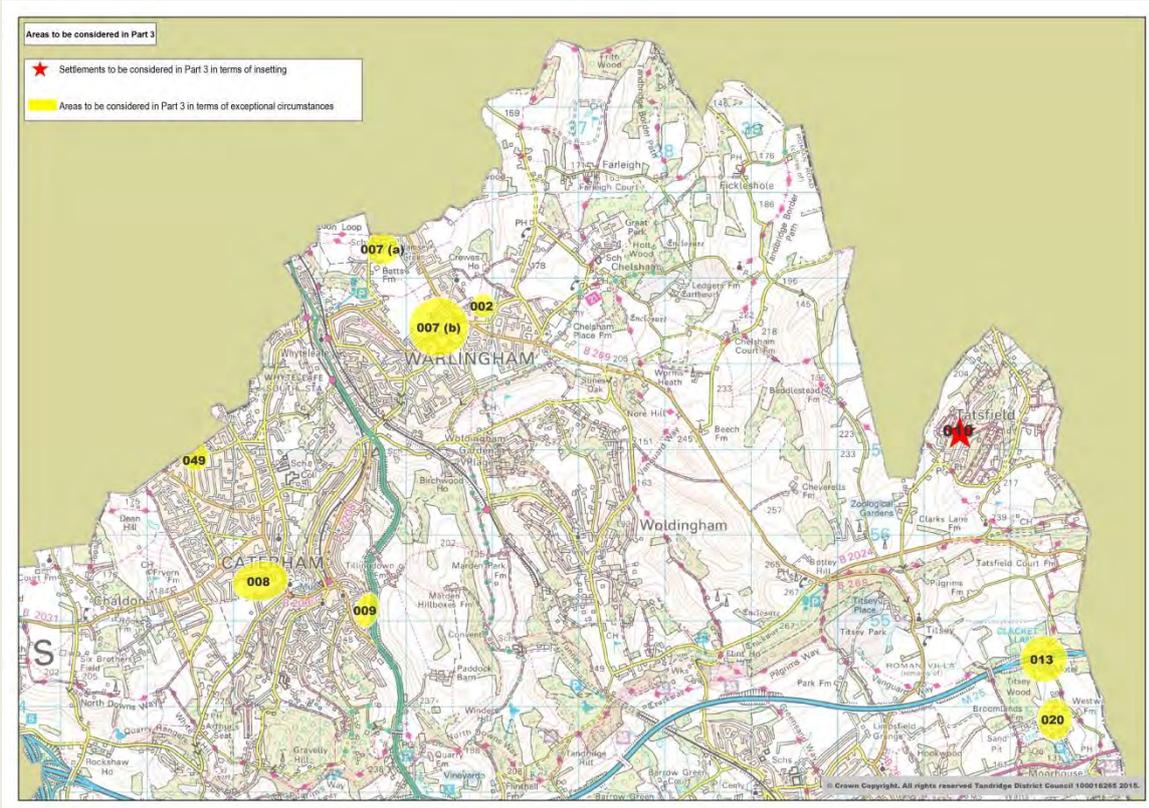
Recommendation 6 of the Green Belt Assessment (Part 1) (December 2015) notes that Green Belt boundaries, once established, can only be altered in exceptional circumstances, through the preparation or review of the Local Plan. If alterations to the boundaries of the Green Belt as part of the Local Plan process are to be made, it must be established whether or not exceptional circumstances exist to justify boundary change. As part of this process, regard should be had to findings of all evidence, including the findings of the Green Belt Assessment. This Part 2 Report has not assessed the presence of exceptional circumstances in any capacity.

Those recommended for further consideration may be considered for exceptional circumstances and if carried forward the conclusions of the Green Belt Assessment may form part of those exceptional circumstances. Those which are not recommended for further consideration on Green Belt grounds may also be considered for exceptional circumstances based on other evidence base considerations. The Sites Consultation Topic Paper provides a more detailed explanation with regards to how these may be treated.

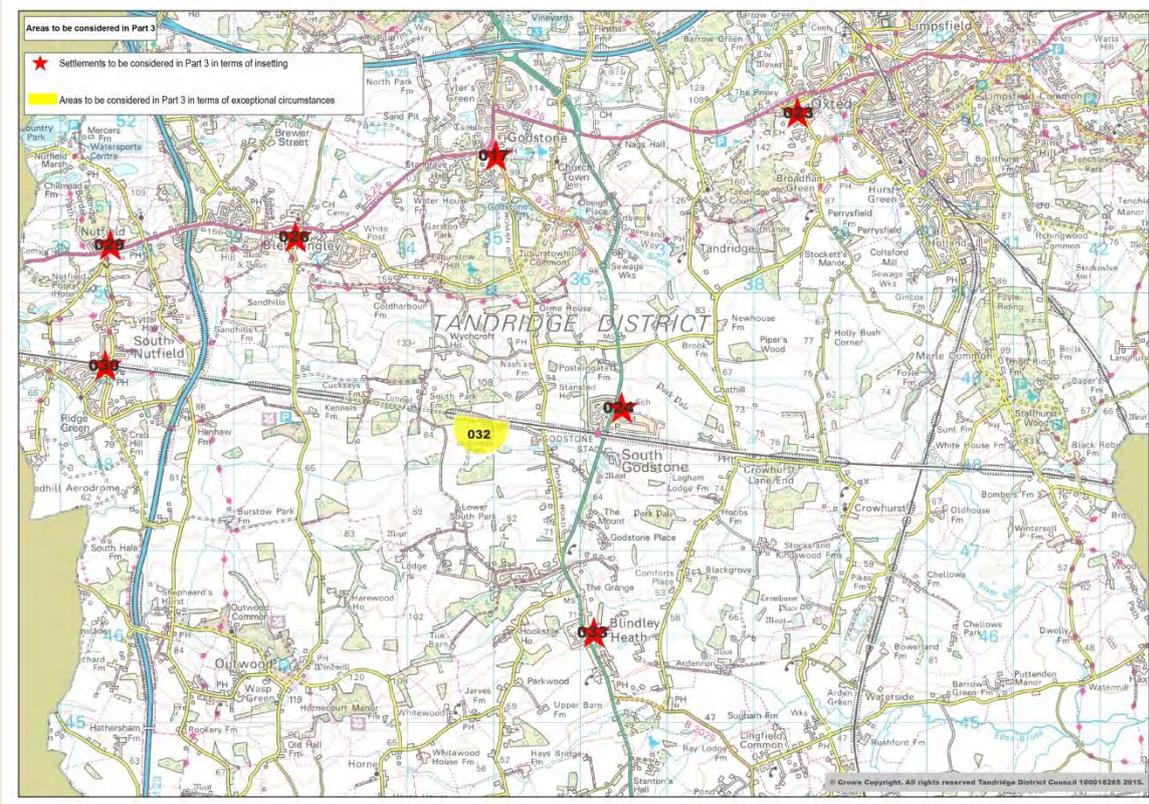
Recommendation 2: Determine if settlements should be inset.

Compared to the considerations around exceptional circumstances, the NPPF stipulates a fundamentally different set of circumstances for the process of establishing whether villages in the Green Belt should be “inset” (Green Belt designation removed) or “washed over” (remain in the Green Belt). It is recommended that as part of the Local Plan process it should be established whether the settlements identified in section 5 of this Report should remain in the Green Belt or be inset.

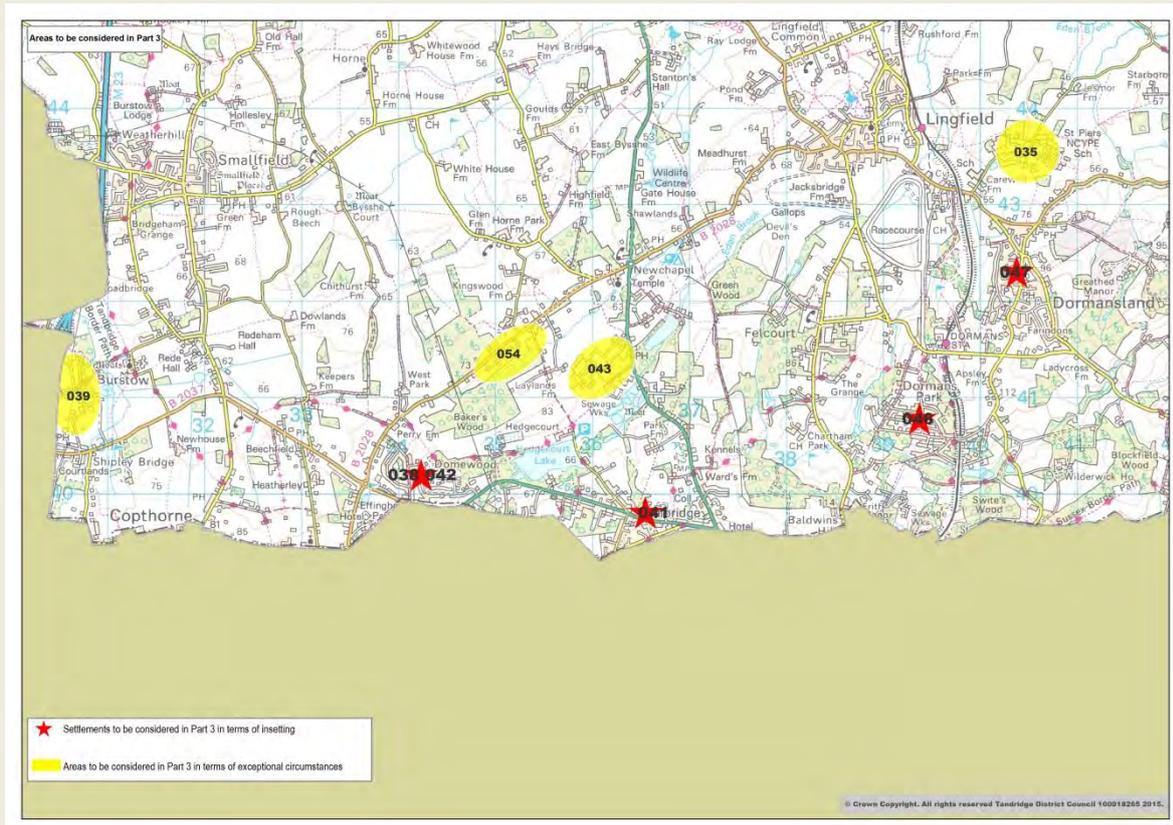
Map 2 Areas to be considered in Part 3 located in the north of the District



Map 3 Areas to be considered in Part 3 located in the centre of the District



Map 4 Areas to be considered in Part 3 located in the south of the District



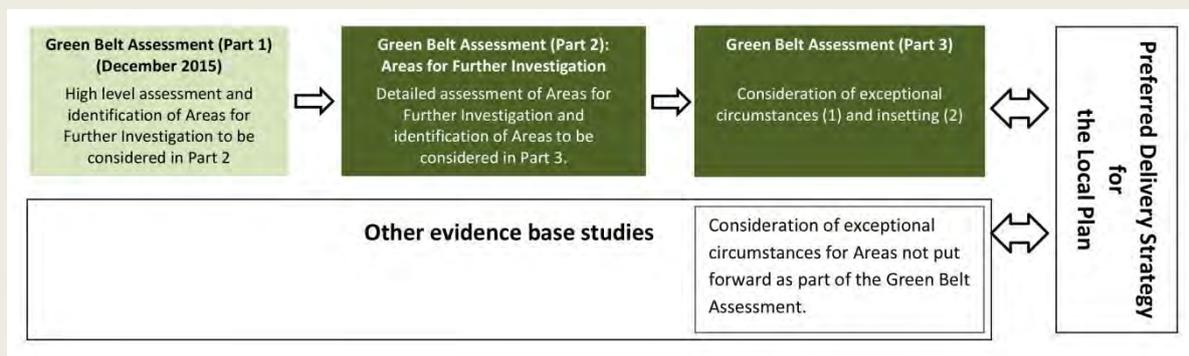
7.0 Next Steps

- 7.1 This section of the Report sets out the next steps in the process and explains how this evidence base document will be used to inform the Local Plan.
- 7.2 It should be noted that it will not be until the next iteration of the Local Plan (Regulation 19) that a preferred delivery strategy will be established, which will involve the identification of specific sites which can accommodate development within the framework of the strategy. All evidence gathered, including this Green Belt Assessment, will inform and feed into the selection of the preferred strategy that will be set out in the Local Plan that the Council intends to submit to examination. Prior to submission to examination, the Local Plan will be subject to public consultation on the soundness of the Plan.
- 7.3 Any specific sites that are identified as part of the development strategy and located within the Green Belt, will be considered through the Local Plan process against national Green Belt purpose 5. Purpose 5 is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land and only within the context of a preferred delivery strategy and specific development sites can it be determined how an area of Green Belt land is directly responsible for brownfield development on the basis of assumptions relating to viability and developability. As explained in paragraphs 3.35 – 3.36 of the Methodology (June 2015) consideration of purpose 5 of including land within the Green Belt must take place on a case-by-case basis through the Local Plan process, rather than through the Green Belt Assessment.
- 7.4 One of the stages involved in identifying specific sites, will include consideration of those Areas marked indicatively in yellow on maps 1-4 of this Report and whether or not exceptional circumstances exist that may justify changes to current Green Belt boundaries in order to arrive at a preferred delivery strategy. It should be noted that there is no definition of exceptional circumstances contained in national policy and ultimately what might amount to exceptional circumstances is a planning judgement. However, some guidance on what may constitute exceptional circumstances for the purpose of the Local Plan can be derived from planning case law. This suggests that the identification of unmet development need in itself is insufficient to constitute exceptional circumstances. However unmet development need may constitute exceptional circumstances where it forms part of a package of other considerations. Accordingly, it is possible that identified need for development alongside other findings of the evidence base studies, including the Green Belt Assessment, may cumulatively be determined as exceptional circumstances.
- 7.5 Furthermore, in considering where boundary changes may be justified, the Local Plan process will take account of the need to promote sustainable patterns of development and consider the consequences for sustainable development of channelling development towards towns and villages inset within the Green Belt. The

Council will also have regard to the Settlement Hierarchy¹⁵ to help determine which areas are considered to be more sustainable, or which have the ability and opportunity to be made suitably sustainable for the benefit of the community.

- 7.6 The Green Belt Assessment Part 3 will give further consideration to whether or not those settlements (marked on maps 1-4 of this Report as stars) should be inset in light of all evidence available. If it is concluded that villages or settlements are to be removed from the Green Belt designation, they would be inset, and thus no longer washed over and subject to Green Belt policies. Instead they would be subject to general policies managing development, such as those set out in the Tandridge Local Plan Part 2: 2014 - 2029, unless the specific circumstances of a settlement require specific policies with the necessary policy mechanisms considered through the Local Plan process.

Figure 3: The Green Belt Assessment process



- 7.7 When exceptional circumstances are being considered, other evidence base considerations may form part of the exceptional circumstances that may justify the release of Green Belt land outside the Areas for Further Investigation recommended in this Part 2 Report. Any area of land released from the Green Belt would similarly be subject to general policies managing development, such as those set out in the Tandridge Local Plan Part 2: 2014 – 2029. Any Green Belt land released and allocated for development in the Local Plan would in addition be subject to a site allocation policy that establishes the general principle of development on the site.
- 7.8 However, there are a number of risks associated with the process of Green Belt review. One of these is the changing national policy landscape in respect of the Green Belt. Since Planning Policy Statement 2 was revoked, there has been limited guidance available setting out the process of carrying out Green Belt reviews contained in the National Planning Policy Framework and National Planning Practice Guidance. No doubt as other areas' local plans undergo the examination process, a body of decisions will be built up which might shape practice in other areas. Furthermore, whilst early indications suggests the likely continuity of current Green Belt policy, following the recent changes in national and London-wide political leadership, the policy framework within which the Green Belt Assessment for the Tandridge Local Plan is carried out may be subject to further change.

¹⁵ The Tandridge District Settlement Hierarchy (November 2015) was undertaken in order to understand the district and the role played by settlements within an area.

8.0. Glossary

Acronym	Word	Description
	Adoption	The final stage of implementation of a Plan; this requires the local planning authority to agree the Local Plan and make it publicly available.
	Affordable Homes/Housing	The Department for Communities and Local Government defines Affordable Homes as “social rented, affordable rented and intermediate housing, provided to specified eligible households whose needs are not met by the market.”
	Ancient Monuments	Any scheduled monument, and any other monument which in the opinion of the Secretary of State is of public interest by reason of the historic, architectural, traditional, artistic or archaeological interest.
	Ancient Woodland	An area that has been wooded continuously since at least 1600 AD.
AGLV	Area of Great Landscape Value	Areas of land considered to have scenic landscape value, which are subject to certain protection rights to development.
AONB	Area of Outstanding Natural Beauty	Areas considered to have such natural beauty worthy of conservation and enhancement, which are situated outside of National Parks.
	Biodiversity	The variety of animal and plant life, on all scales, found within a specified geographical location.
	Built Form	Another term for development.
	Character	A term relating to Conservation Areas or Listed Buildings, but also to the appearance of any rural or urban location in terms of its landscape or the layout of streets and open spaces, often giving places their own distinct identity.
	Coalescence	The merging or coming together of separate towns or villages to form a single entity.
	Conservation Areas	An area designated by the Council for its special architectural or historic interest, and where it is important that this special character is preserved or enhanced.
	Conurbation	A large densely populated area formed by the growth and coalescence of individual towns or cities.
	Countryside	Any land in Tandridge District which is not inset from the Green Belt, any defined villages in the Green Belt or an industrial area as set out in the Councils up to date Economic Needs Assessment.
	Curtilage	The area normally within the boundaries of a property surrounding the main building and used in connection with it.
	Defined Village/Town	The basis for determining whether a village should be included within the Green Belt is set out in the NPPF paragraph 86 as follows; “ <i>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.</i> ” The defined settlements in Tandridge were defined through the Tandridge District Council Detailed Policies 2014, but the Local Plan could change this.
	Development	Development is defined under the 1990 Town and Country Planning Act as “the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land”.

	Dwellings	Self-contained units of residential accommodation. This includes houses, apartments, and maisonettes.
	Employment Sites	Specific locations that have been identified as potential and/or existing sites for business and employment.
	Encroachment	Development in the Green Belt which is not connected to a larger built up area or existing settlement and which post-dates the designation of the Green Belt which came into effect in 1958 and 1974.
	Footprint	The formal boundary of either a building or piece of land.
	Gatwick Airport Public Safety Zone	Areas of land at the end of runways established at the busiest airports in the UK, within which certain planning restrictions apply. These aim to control the number of people on the ground at risk in the unlikely event if an aircraft accident on take-off or landing.
GB	Green Belt (Metropolitan)	A policy designation for land surrounding London. The Metropolitan Green Belt stretches from the edge of London's built form and covers areas of land as far out as Berkshire, Sussex and Essex. The fundamental aim of Green Belt "is to prevent urban sprawl by keeping land permanently open." Settlements, roads and industrial units can all be in the green belt.
	Green Belt Boundaries	The border of any land designated as Green Belt.
	Green Belt Release	A change in policy which alters the designation of land as Green Belt and removing it from the Green Belt designation.
	Hard Standing	Land which has been surfaced with a hard material such as tarmac or concrete in order to park vehicles on and/or utilise for transportation of vehicles of some kind.
	Historic Core	Historically, the centre of a village, town or city which has special architectural or historic interest and which may also be designated as a conservation area.
	Infill/Infilling	The development of relatively small gaps between existing buildings.
	Infrastructure	The basic services required in order to support homes, businesses and travel etc. This includes utility services such as energy provision and sewage treatment, as well as transport networks.
	Inset	A village/town that is not included within the designation of Green Belt.
LNR	Local Nature Reserves	Places with wildlife or geological features that are locally significant i.e. certain species, rocks or minerals can only be found in that area. These are often managed by local community volunteers.
	Local Plan	One document within the Local Development Plan. The Local Plan is a planning policy document prepared by the Local Planning Authority that guides development for the plan period of 20 years. The Local Plan is subject to consultation and independent examination before the Local Planning Authority can adopt the document.
NPPF	National Planning Policy Framework	A document that sets out the Government's planning policies for England and how these are expected to be applied. the Framework was published in March 2012
	Open Space	All open space of public value which offer important opportunities for sport and recreation and can act as a visual amenity.
	Openness	Openness refers to the absence of built development.

	Parcel	An area of land which is subject to assessment. The entire District was divided into assessment parcels based on its characteristics and key physical features to enable comprehensive assessment and to make the process more manageable.
PPG	Planning Practice Guidance	Guidance for local authorities on best practice for implementing the Government's planning policies set out in the NPPF.
	Ribbon Development	Development, usually residential, usually extending along one or both sides of a road but not in depth i.e. one row of properties as opposed to comprehensive clusters.
	Rural Exception Schemes/Sites	Small sites used for affordable housing which are retained in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable units without grant funding.
	Self-Contained Development	Development which conforms to strict boundaries and which has not lent itself to any sprawl.
SSSI	Sites of Special Scientific Interest	Sites designated by Natural England under the Wildlife and Countryside Act 1981.
	Strategic Employment Sites	An area that provides a large amount of employment and which contributes to both the local economy and wider area.
	Topography	A description (or visual representation on a map) of the shape of the land, for example, contours or changes in the height of land above sea level.
	Urban Sprawl	The advancement of uncontrolled, ad hoc, unplanned and sporadic development beyond the clear physical boundary of a settlement.
	Washed Over	Villages/towns which are within the Green Belt and continue to hold the designation.

A.1. Appendix 1

A.1.1 As explained in Section 1.9 of this Report, a number of indicative Areas for Further Investigation are being considered for the purpose of the Green Belt Assessment. These include the 49 Areas for Further Investigation identified in Appendix F of the Green Belt Assessment (December 2015) and 6 additional Areas for Further Investigation. This Appendix illustrates all 54 Areas for Further Investigation that are subject to detailed analysis on a map.

