

# **Tandridge Green Belt Assessment**

**review by**

**Anna Cronin, BA, DipTP, MSc, MBA, MRTPI  
Director, Mole Ember Ltd.**

**October 2015**

# Contents

1.0	Introduction	page 3
2.0	Documents Reviewed	page 3
3.0	Method	page 3
4.0	Findings	page 4
5.0	Recommendations	page 5
Appendix 1	Summary Notes of Issues	page 6

## **1.0 Introduction**

- 1.1 This report is the summary outcome of a “critical friend” review requested by Tandridge District Council (TDC) planning officers of the draft Green Belt Assessment Part 1, in line with para 1.10 of the agreed Methodology. The Assessment was carried out by Tandridge officers in 2015, and the critical friend review was carried out in late October 2015.
- 1.2 TDC sought views on:
- Consistency within the document
  - Compliance with the methodology
  - Areas that may not be clear and need further explanation
  - Areas of concern – giving particular attention to soundness and legal issues, where appropriate.
- 1.3 As described in section 3.0, detailed comments on the documents reviewed were supplied to TDC separately.

## **2.0 Documents reviewed**

- Green Belt Assessment Methodology (as this was finalised in June 2015 it was not reviewed, but was used as an important background document)

In draft:

- Green Belt Assessment (GBA) report
- GBA Appendix A Maps of Historic Development Plans
- GBA Appendix B Historic Change Assessments
- GBA Appendix C Strategic Green Belt Areas
- GBA Appendix D Parcel Assessments
- GBA Appendix E Green Belt Settlements and Maps
- Appendices G and H Maps of Areas for Further Investigation and Critical Areas

## **3.0 Method**

- 3.1 The GBA Methodology was read initially, as the task was fundamentally to check whether the approach laid down was followed consistently in the subsequent work.
- 3.2 It should be noted that no judgement was made of, for example, the assessments of individual parcels. Rather the approach was to check

consistency in approach, application of the agreed methodology, terminology and clarity of presentation.

- 3.3 The GBA report was considered first as an overview, before Appendices B, C, D and E were read with particular reference to whether the approach within them followed the Methodology, and whether areas of text within them were not clearly expressed. Track changes were used to note queries and suggest alternative wording as appropriate. As part of this process, any spelling or other editorial errors noted were also flagged although this was more detailed in the case of the Parcel Assessments than the other Appendices.
- 3.4 The GBA report was then reconsidered in the light of the Appendices, and detailed track changes used as above.
- 3.5 The areas identified for Further Assessment and the Critical Areas identified in the text were cross checked with the relevant summary maps.
- 3.6 A number of issues were identified as a result of this work. These were raised with TDC officers in a telephone conference, and a note of them was supplied – see Appendix 1 to this report.

#### **4.0 Findings**

- 4.1 Although the Methodology was not reviewed as such, it correctly notes that there is no one generally agreed way in which to conduct a Green Belt Assessment (para 3.1), and no requirement that land serve all five national purposes of Green Belt. The approach taken, of assessing defined parcels across the whole Green Belt area against the national purposes of Green Belt, is a robust one. Relating Purpose 4 to conservation areas in the local context is also a legitimate approach. The explanation given in paras. 3.35 and 3.36 for omitting assessment of Purpose 5, to encourage regeneration, is also defensible.
- 4.2 Both the Methodology and the report are clear in taking the correct approach of assessing the current situation “on the ground” separately and in advance of any consideration of potential changes to the Green Belt boundary.
- 4.3 The report contains a number of boxes explaining where minor changes to the Methodology became necessary as a result of practical experience. In my professional experience, unless a thorough pilot survey is carried out the application of the agreed methodology in the field usually throws up the need for such minor changes – and it is sometimes necessary even where a pilot is carried out. The approach taken in the report is pragmatic and transparent.

4.4 The suite of appendices to the report provides a robust body of evidence. All the settlements have been considered in the context of their contribution to Green Belt purposes. This is important in the context of the NPPF para 86. It can be argued that the historical context set out in Appendix B is not strictly required for assessing how far the current Green Belt meets national purposes, but given the complex history of Green Belt boundaries in the district, as well as the impact of the local application of changing national policy over the years, this is considered to be helpful evidence which is more likely to be useful at a later stage when looking into the areas which are identified for further investigation.

4.5 See Appendix 1 for other comments.

## **5.0 Recommendations**

**It is recommended that TDC take into account the comments made in Appendix 1 before publication of the Green Belt Assessment.**

## Appendix 1 Summary Notes of Issues

Inevitably these comments focus on areas which could improve the project, but the amount of work that has been completed and presented well should not be underestimated.

No comments have been made on the Methodology as such, as this was a given.

The whole document and appendices would benefit from a thorough proof reading. Although the analysis cannot avoid being subjective to some extent, it would be better to avoid the use of “emotive” adjectives, such as vast and stunning when describing parcels – extensive, wide would be suitable substitutes.

All map keys should be checked and boundaries, eg of districts, labelled.

### 1.0 Overall Report

- 1.1 It would be helpful to include a have a section explaining how all the appendices, elements of assessment etc come together and are/will be used.
  - 1.2 It would be helpful to include a Glossary. For a non-technical readership, such terms as *washed over*, *defined village*, *rural exception site* need to be explained as they have specific meanings in relation to national Green Belt policy past and present. There is much misunderstanding of what development is/is not allowed in Green Belt, both under current and previous national policy. It would assist readers if a brief summary table could be included as, for example, at one point institutions in extensive grounds were acceptable development, and rural exception sites are a comparatively recent inclusion. This would be very useful when considering the historical aspects of Parcels, although admittedly it might not be possible to chart all changes in acceptable land use over 50 years.
  - 1.3 Given changes in national policy, although the report is correctly at pains to point out that in itself it does not alter Green Belt boundaries, it might be beneficial to point out that TDC may need to use the analysis to consider any changes required to comply with policy. In particular I have in mind the very limited areas where Parcel Assessment has identified existing boundaries which are not clear on the ground.
  - 1.4 Within the GBA Report, the boxes explaining how the Methodology was interpreted and changed in practice are useful, and provide transparency for the inevitable issues that arise in fieldwork.
- 2.0 Strategic Areas** - How these were assessed is not explained in either the Methodology or in Appendix C, and it should be set out. It appears to be a

mixture of history, landscape, land use, and tranquillity, assessed in a strategic, broad brush way.

- 3.0 Purple/blue areas** – the report is clear that purple and blue areas are areas identified in the Parcel Assessments for further investigation, for different reasons. However, blue areas, which the Methodology sees as areas which are “positively deviant”, appear to translate into the map of “Critical Areas”. This phrase is not explained, although it appears on the map and in the relevant Parcel Assessments. While para 5.9 of the Methodology is clear that identification is not a judgment on whether the Green Belt in these areas is weak or strong, the use of this unexplained phrase carries connotations and should be reviewed/explained.
- 4.0 Appendix B Historical information** There is a lot of research behind this and at first I queried whether it was necessary, given the basic task of assessing the Green Belt as it is today, and whether it is fit for the future. However, as I became more aware of the complex history of Green Belt definition in the TDC area, and given changes in national Green Belt policy over the years, I came to appreciate this as a resource, for understanding current boundaries and for further detailed work.
- 5.0 Appendix D Parcel Assessments**
- 5.1 The Methodology states that the parcel analysis will look at whether the area has changed since the Green Belt was designated. However, few parcels do this explicitly; Parcels 015,022,024 and 026 are exceptions.
- 5.2 To carry out such analysis, and write it up in the context of the Parcel, requires use of the historical maps and information in Appendices A & B. If this historical information is not used in the Parcel Assessments, where it is used? See my comments above re Appendix B, and in relation to an overall description of how all the elements of research come together – is it only required in further work where areas are identified for Further Investigation/Critical Areas?
- 5.3 Contrary to the Methodology, some Parcel Assessments do not describe the boundaries of the parcel. Parcel 001 is an example of this.
- 5.4 Where openness is mentioned in the parcels, is it assessed in a common way? It is clear that expanses of agricultural countryside are open, but in Parcel 001 playing fields are defined as not open, when clearly there are two aspects: land use (ie they are open and not built on) and context as part of a wider expanse/view (ie they are not open as development around them).
- 5.5 In parcel 001 the “scruffiness” of the land appears to be part of the assessment, but this is transitory and not part of the assessment of the contribution to Green Belt purposes.

- 5.6 In a number of Parcel Assessments the need for Further Investigation of “deviant purple areas” is referred to in the text on purposes but not in the Conclusions. These include parcels 005,009, probably 026, 027,028,032,035,036,038.
- 5.7 The identification of “deviant blue areas” ie Critical Areas is more consistently carried through to Conclusions, though appears to be missing in Parcel Assessment 038.
- 5.8 All the areas identified for Further Investigation ie purple (whether in text, Conclusions or both) do appear on the relevant map. As an editing refinement, a cross reference from the Parcel Assessments to the relevant number on the map of areas for Further Investigation would be helpful.
- 5.9 In areas where the Green Belt boundary is identified as not very defensible, as in parcels 018 and 022, one would expect these to be identified for Further Investigation - but they are not.
- 5.10 Identification of “Critical Areas” – see also comments in para 3.0 above. In Parcel Assessment 004 mention is made of a “critically important strip” – what is meant by this? In some assessments the word “important” appears to be used as a synonym for “critical”, as areas identified as “important” then appear on the blue blobs map.
- 5.11 It is not clear how/if the critical areas identified in Parcel Assessments 029 and 031 are reflected on the blue blobs map. And area 007 on that map appears to be almost the whole boundary with Outer London, and the same as Strategic Area A.
- 5.12 As an editing refinement, a cross reference from the Parcel Assessments to the relevant number on the map of blue blobs would be helpful.
- 5.13 It is assumed that the colour of the Overall Contribution maps in the Parcel Assessments is derived by GIS layering, as this was not checked visually.

## **6.0 Appendix E Green Belt Settlements and Maps**

- 6.1 The maps have not been added yet.
- 6.2 The text needs paragraph numbers for reference.
- 6.3 I assume that the assessments are carried out in line with para. 4.5 of the Methodology.
- 6.4 Each section of text concludes with a paragraph reaching a conclusion. It would be helpful if these paragraphs could be given a heading eg Conclusion: xxxxx



- 6.5 Where the text identifies areas for Further Investigation, eg Bletchingley, a cross reference to the map of areas for Further Investigation would be a helpful refinement.
- 6.6 All the *defined villages* appear to be identified for Further Investigation **except** Godstone, although the text suggests that it does not contribute much to the Green Belt purposes. However, similar comments are made of Blindley Heath, which **is** recommended for Further Investigation.
- 6.7 And on the blob map of areas for Further Investigation, **both** Godstone (area 006) and Blindley Heath (021) are shown.
- 6.8 Insets – there is a descriptive section of text on the Insets, but apparently no conclusion on whether these should be considered for Further Investigation or not, although one would assume that the boundaries require examination to check that they are still relevant and defensible, at the least.