

# **Tandridge Green Belt Assessment**

## **Part 2**

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**Review by**

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## 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 7

## **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 2. The Assessment was carried out by Tandridge officers in 2016, and the critical friend review was carried out in August 2016.
- 1.2 TDC particularly sought views on:
  - Consistency in the approach taken to settlements
  - And areas for additional protection/enhancement
- 1.3 As described in section 3.0, detailed comments on the documents reviewed were supplied to TDC separately.

## **2.0 Documents reviewed**

The following documents supplied by TDC were intensively reviewed:

- Green Belt Assessment Part 2 draft for critical review (GBA) report
- Appendix 2 Working Draft 310716

In addition, the Green Belt Assessment Part 1 published on the Council’s website was consulted where necessary as background, as was the National Planning Policy Framework.

## **3.0 Method**

- 3.1 The GBA Part 2 draft was read initially, in order to gain an understanding of how the work of the GBA Part 1 was being progressed and the approach used, as the task was fundamentally to check whether the approach laid down was followed consistently in Appendix 2.
- 3.2 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. In some cases additional wording to assist the general, non-specialist, reader was suggested, and in other cases more

concise wording. This annotated draft has been returned to TDC for consideration.

- 3.3 The Areas for Further Investigation were cross checked with the relevant summary maps to ensure all were shown.
- 3.4 Appendix 2 was then considered, and detailed track changes used as above, with the annotated draft being returned to TDC. In the Appendix, the consultation comments were generally not amended, even where these are hard to follow, as they are assumed to be copied directly from what was said by respondents.
- 3.5 The areas identified for further consideration in Part 3 were cross checked with the tables in the GBA Part 2 report.

It should be noted that the purpose of the review was not to check the conclusions reached by officers, other than noting where these were not clear, were inconsistent in approach or did not appear to flow from the justification presented.

## 4.0 Findings

### Methodology and Approach

- 4.1 As in 2015, it remains the case that there is no one generally agreed way in which to conduct a Green Belt Assessment (para 3.1 of the TDC Methodology), and no requirement that land serve all five national purposes of Green Belt.
- 4.2 The general conclusion is that the report and Appendix 2 are based on a defensible methodology and thorough and clear in their findings, if slightly laboured and repetitive in places. A very considerable amount of information gathering and analysis has taken place, providing a detailed picture of the Green Belt in the district.
- 4.3 The graphics, eg on page 3 of the Report, are very useful and the continuation of the GBA Part 1 approach of using blue boxes to show changes in methodology is also helpful and transparent.
- 4.4 It is noted in para 2.4 that comments made at Issues and Options stage have been taken on board and influenced the approach taken in Part 2. This is good practice, as is the setting out of the comments in the relevant part of Appendix 2. Generally the methodological approach is robust and appropriate, utilising various techniques and involving “check and challenge”

of results. It is entirely reasonable to focus only on relevant planning applications for consideration, and this is a useful part of the analysis in Appendix 2.

- 4.5 It is also considered appropriate not to go back and amend the GBA Part 1 in places to respond to comments.

### **The Wider Role of the Metropolitan Green Belt**

- 4.6 Some of the suggested wording changes are to emphasise the **national** purposes of Green Belt. Although the text is clear that the GBA Part 2 Report is not to be read as a standalone document, in my professional experience readers may need to be reminded that Tandridge's Green Belt is defined under **national** guidelines. I have suggested that the national purposes be set out in the report.
- 4.7 This is particularly relevant because of the inevitable focus on Green Belt land in Tandridge. While this is completely understandable, given the scope of the Review, it should be borne firmly in mind in undertaking the review as a whole that this is the **Metropolitan** Green Belt around London as a whole, extending into neighbouring London boroughs and Surrey districts. In parts of the text in Appendix 2, eg in AFI 006, there appears to be a hint of needing to maintain Green Belt in TDC to "repel sprawl" (my phrase) from Bromley and Croydon. Yet both boroughs also have extensive areas of Green Belt within them, have the same responsibilities under the NPPF as Tandridge, and the land across the boundary within London may also be Green Belt. While it is not mentioned in this stage of the Green Belt Review specifically, there is a Duty to Co-operate issue to be considered in terms of defining coherent areas of Green Belt across administrative boundaries.

### **Matters which would benefit from clarification**

- 4.8 There are a few areas where it is difficult, or confusing, to follow the reasoning in the Part 2 Report.
- 4.9 The first is in para 1.7, which states that most of the AFIs have been identified because they include clusters of development of various sorts. Generally speaking, such development would be a negative contribution to Green Belt purposes, depending on scale. However, the text goes on to say that not all are identified for negative purposes, some for their positive contribution. This is confusing. It may be that what is meant is that some areas are identified because although they contain development, they also contain areas which may contribute positively to Green Belt. These could be areas where the

“blob on the map” contains a cluster of development, but also a sports ground or other open area. It would be worth revisiting this paragraph and other instances where this explanation occurs.

- 4.10 The second is in para 1.17<sup>1</sup>, point 2 Additional Protection or Enhancement, which is difficult to follow. Paragraph 81 of the NPPF is clear that one first defines the Green Belt, then looks for enhancement opportunities. It is of course sensible to collect information on possible enhancements at the same time as collecting other data on site. However, if areas are really important in their Green Belt role, they should be secure in being protected strongly for this role even when challenged, and defensible on appeal. It is difficult to visualise what stronger protection for Green Belt purposes might be necessary or possible, unless this is an “insurance policy” against possible changes in national policy which might be at odds with local thinking, or is linked to a possible future delivery strategy in the Local Plan, as is hinted in para 7.4<sup>2</sup>. Elsewhere, eg in Appendix 2 AFI 002, this proposed additional protection appears to be related to the lack of definitive boundaries, and if this is a key concern it would be preferable to set this out in para 1.17<sup>3</sup>.
- 4.11 It should also be noted that para 3.6<sup>4</sup> implies that only one area is identified for consideration for additional protection, but Table 2 of the Report lists two.
- 4.12 In Section 7, AFI 33 appears on both maps 3 and 4.

### **Treatment of settlements/clusters of development to be further considered for inseting**

- 4.13 The phrases “Defined Village” and “countryside by definition” are used extensively in the analysis. They have specific meanings in the local context, but it is not easy to find a definition even in the Glossary in GBA Part 1.
- 4.14 In the vast majority of cases recommended for further examination in Part 3 it is apparent that they either consist of areas of extensive or large scale development, some which has taken place since Green Belt designation, or compact and dense areas of development which are greater in depth than “ribbon” development, or spacious low density development which nevertheless is extensive in area. As far as can be assessed without detailed knowledge, the conclusions appear consistent.
- 4.15 However, the text regarding Godstone AFI 017 is not well expressed and the text in Appendix 2 should be reviewed (this is also noted in the comments on Appendix 2 below).

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<sup>1</sup> Previous paragraph 1.17 Additional Protection or Enhancement has been deleted. See paragraph 2.35 on page 19 of the Report for explanation.

<sup>2</sup> Paragraph 6.4 in revised Report.

<sup>3</sup> See footnote 1.

<sup>4</sup> Paragraph 3.6 has been deleted. See footnote 1.

- 4.16 Nutfield AFI 029 is also not well expressed as the “map blob” appears to relate to an area at the western end of the village, while the analysis appears to apply to the whole settlement. On the latter basis further consideration in Part 3 appears reasonable.
- 4.17 There is a potential issue in how residential development with gardens backing on to Green Belt are treated. In AFI 030 South Nutfield, for example, gardens are seen as providing a transition to undeveloped Green Belt. Elsewhere, eg AFI 033 Blindley Heath, where gardens also appear to back on to Green Belt, residential development is noted as being in close proximity and seen from the Green Belt, and therefore not contributing to openness. Are these really different situations, or just different ways of viewing similar situations?

### **General Comments on Appendix 2**

- 4.18 It is assumed that all the maps are all to the same scale, as this is relevant to descriptions of the scale of development. It would helpful to add an appropriate note to this effect.
- 4.19 It can be hard to relate text comments to the maps when the names of settlements/areas of development do not appear on the OS base maps. AFI 014 is an example, the text mentions Bletchingley and Godstone, Bletchingley is half-named, but there is no indication of Godstone. AFI 002 is another where, without referring back to GBA Part 1, one cannot distinguish between the large and small inset areas of Warlingham, which makes the analysis hard to follow. AFI 003 talks about Warlingham and Chelsham, but with no indication of where Chelsham is. In some cases additional labelling would assist.
- 4.20 Where parcels abut the administrative boundary, shown in green on the maps, it would be helpful to label the adjacent borough/district.
- 4.21 “Common land” has a specific meaning in law, and its development is very tightly constrained (whether or not it is located in Green Belt). AFI 006, AFI 007, AFI 022, AFI 027 and AFI 050 are examples of where the phrase is used, not always definitively. Unless land is definitely common land, it would be better to use a phrase such as “appears to have informal public access”.
- 4.22 AFI 017 Godstone – the text for this Area should be reviewed as it is not clearly expressed.
- 4.23 The conclusions regarding AFI 037 in Appendix 2 are not clear and should be reviewed.
- 4.24 AFI 044 on the borders of Lingfield should also be reviewed as it is not clear in its conclusions. The text appears to be recommending that should be

looked at further in terms of exceptional circumstances, but the Area does not appear to be listed in the relevant table in the Report.

## **5.0 Recommendation**

**It is recommended that the matters raised in Section 4 of this report are given consideration before the Green Belt Assessment Part 2 and Appendix 2 are finalised for publication.**