

ANNEXE 1

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

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

- 1.1 Following the identification of land parcels in Stage 1, each individual parcel was assessed to establish the extent to which it contributes to the purposes and integrity of the Green Belt.

- 1.2 The NPPF sets out that the essential characteristic of the Green Belt is its openness and permanence. As set out in Section 2 above, it then defines five purposes of Green Belt: it is these five purposes which have formed the basis of the appraisal of each identified parcel:
 - To check the unrestricted sprawl of large built-up areas;
 - To prevent neighbouring towns merging into one another;
 - To assist in safeguarding the countryside from encroachment;
 - To preserve the setting and special character of historic towns; and
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 1.3 A series of robust, transparent and measurable decision-aiding criteria were developed in order to assess the contribution made to a particular purpose: these are discussed in more detail below. Each site was assessed against these “measurable” criteria but this was also supplemented by a qualitative analysis in recognition of the fact that some individual parcels have unique characteristics/situations which may not be reflected in purely quantitative measures. As an example of the qualitative measures that were considered, in some cases the topography of a parcel made it visible at long ranges, although strong boundaries made it less visible at closer ranges. In another

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

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

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

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

Table 2: Decision aiding criteria for Purpose 1

Appraisal considerations	Decision-aiding principles	Indicative Rating
Does the parcel protect open land which is contiguous or close to larger towns?	How well surrounded is the parcel by the existing urban area?	Higher importance to Green Belt
Does the parcel play a role in preventing ribbon development and non-compact development?	<i>Not contained</i> - Little or none of the boundary of the parcel is contiguous with the existing urban area. As a result, the majority of the parcel is largely detached from – and poorly related to – the existing urban concentration. Parcels not adjacent to the urban area or separated from it by an impermeable feature (e.g. motorway) are also considered to be not contained	
Are there clear and robust boundaries to contain development and prevent sprawl in the long term?	<i>Partially contained</i> – a minimum of 30% of the parcels boundary is contiguous with the existing urban area and the parcel has some appreciable relationship with the urban area	Lower importance to Green Belt
Would sprawl be stopped by other barriers other than land within the Green Belt?	What is the strength of the boundaries of the parcel?	High importance to Green Belt
	<i>Well contained</i> – a minimum of 65% of the boundary of the parcel is adjacent to the existing urban area. As a result the parcel feels enclosed by and well related to the existing urban area. Parcels with a reasonable level of contiguity with the urban area but which are enclosed externally by other strong features (e.g. motorway) are also considered to be well contained.	Lower importance to Green Belt
	<i>Weak</i> – the boundaries of the parcel are predominantly formed by features classified as weak in Table 1 above	
	<i>Average</i> – the boundaries of the parcel are partially formed by features classified as strong in Table 1 or the boundaries intermittently change between weak and strong features	Lower importance to Green Belt
	<i>Strong</i> – the boundary of the parcel is predominantly formed of features classified as strong in Table 2 above.	Lower importance to Green Belt

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

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

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

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

Table 3: Decision aiding criteria for Purpose 2

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

- 1.11 However, it was recognised that in the case of this purpose, there is also a need for a qualitative consideration of both the sensitivity of a particular settlement gap and the perception of merging “on the ground”. Whilst this particular issue has been afforded differing weight by Inspectors (and the Secretary of State) at appeal⁴⁵, it has nonetheless been recognised as a reasonable consideration in assessing this Green Belt purpose.

- 1.12 For the purposes of this study, a series of factors including the landscape between settlements and whether there are intervening visual/physical features (such as motorways, railways, landforms, vegetation etc.) were considered. This has allowed recognition to be given to the fact that, in some cases, the intervening landscape can change the perception of a settlement gap and reduce (or increase) its vulnerability to visual coalescence at a local scale. Whilst this more descriptive assessment has not been rated (e.g. as high, medium or lower importance in its own right), it has, where relevant, been reflected in the overall balance of the appraisal and rating for this

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

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

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

Purpose 3: To assist in safeguarding the countryside from encroachment

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

Table 3: Decision aiding criteria for Purpose 3

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

	in Table 1 or the boundaries intermittently change between weak and strong features	
	<i>Strong</i> – the boundary of the parcel is predominantly formed of features classified as strong in Table 2 above.	Lower importance to Green Belt

1.16 It was again recognised for this purpose that there was a need for a qualitative consideration of the extent to which a parcel forms part of the wider countryside fabric. Whilst this is in part related to parcel boundaries, it entails a more descriptive understanding of the level of inter-visibility and relationship between a parcel and the surrounding countryside, recognising that perceived impact of encroachment arising from a parcel which is “severed” from the wider countryside by strong boundary features will be less than a parcel where long range views across it and the wider countryside are possible. Again, whilst this more descriptive assessment has not been given its own high, medium or low rating it has, where relevant, been reflected in the overall appraisal and rating for this purpose.

1.17 Consideration was also given to whether a parcel contributes to, or provides, “beneficial uses” as set out in the NPPF (para 81). The rationale behind this is that those parcels which already support these “beneficial uses” are already operating as positive and valuable countryside. Issues such as whether the parcel provides formal sport/recreation space, is covered by a network of rights of way (thus accessible to the public), or whether the parcel has particular recognised landscape or biodiversity value were identified in the parcel assessments.

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

1.18 There are no nationally recognised historic towns in the borough. However, Reigate town centre has historic qualities, and is covered almost wholly by a Conservation Area. As such, it is arguably the asset to which the greatest level of protection ought to be provided under this purpose.

1.19 As part of the assessment of individual parcels, a number of other heritage assets were considered to be important in terms of maintaining historic setting, including other Conservation Areas and designated Historic Parks. However, given these do not strictly comply with the definition of “historic towns” as set out in the NPPF, the ratings afforded to parcels were moderated to reflect their lesser importance. Whilst more subjective than other measurable criteria, the principles of assessment are set out in the Table 4 below.

1.20 Settings were not identified around listed buildings (or even clusters of listed buildings). This is because, in general, the setting of a listed building is relatively localised rather than of “landscape scale” such that it would impact on the entirety of a parcel. For this reason it can be more adequately managed through a conventional development management approach. In

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

Table 4: Decision aiding criteria for Purpose 4

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

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

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

Table 5: Decision aiding criteria for Purpose 5

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