
Subject Elmbridge GBBR: Response to Public Consultation Comments on Green Belt
Date 8 June 2018 **Job No/Ref** 258097-00

1 Introduction

Ove Arup and Partners Ltd (Arup) was appointed by Elmbridge Borough Council (EBC) to undertake a Green Belt Boundary Review (GBBR) as part of the evidence base to support the Elmbridge Local Plan. The Study assessed all Green Belt land in Elmbridge against the purposes of Green Belt, as defined by the National Planning Policy Framework (NPPF) (March 2012). As set out in the Methodology and Assessment Report (March 2016), the Study aimed to:

- Comprehensively assess of the extent to which land designated as Green Belt continues to meet the aim and purposes of such land;
- Identify the strategic and cross boundary impacts in relation to land designated as Green Belt arising from current and future development in neighbouring Boroughs; and
- Identify any land that no longer meets the aims and purposes of Green Belt and which could have this designation removed.

Arup completed the Study in March 2016.

Between 16th December 2016 and 24th February 2017, EBC undertook formal consultation on its Strategic Options document, *Shaping Elmbridge: a new Local Plan*, the first stage in the process of developing its new Local Plan. As part of the consultation, the emerging evidence base was also published, including the GBBR.

Arup was subsequently commissioned by EBC to provide support in responding to representations made in relation to the GBBR. This note summarises the outputs from this process, including:

- A high-level review of EBC's summaries of the key issues relating to the GBBR;
- Responses to each of the key issues raised by representations in relation to the GBBR; and
- A summary of any potential impacts on the findings of the GBBR, including confirmation as to whether any further work is required.

2 Review of “Summary of Consultation Responses”

In response to the Local Plan Strategic Options Consultation, the Council received approximately 50,000 comments from 3,760 respondents. The Council registered and read all comments, and the key issues raised were reported to Councillors in a Summary of Consultation Responses document.¹ The document was then published on the Council's website. Comments made regarding the GBBR, both in terms of the methodology and specific local areas, were summarised over paragraphs 13.12 – 13.99 (page 135 – 147).

To support the review of issues raised, Arup was asked to respond to each of the key issues highlighted in the summary of responses document and to review a sample of the original responses

¹ Elmbridge Borough Council, Elmbridge Local Plan: Strategic Options Consultation (Regulation 18) Summary of Consultation Responses (July 2017) - <http://consult.elmbridge.gov.uk/consult.ti/lpsoc/consultationHome>

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received to ensure that no key issues had been missed. This review concluded that the *Summary of Consultation Responses* document captures and adequately summarises the key issues emerging from the Consultation in relation to the GBBR.

However, it should be noted that through this more granular review, consultation response #523296 identified one specific typographical error which could warrant clarification through the means of an erratum note. This relates to a clarification over the terminology utilised in the assessment criteria for Purpose 3, whereby the term “semi-urban” is omitted from the score criteria for a score of ‘2’. It should be noted that this does not impact upon the scoring of any Local Area or the overall findings or recommendations arising from the GBBR.

3 GBBR Issues Raised - Responses

The following table reviews and responds to each of the issues relating to the GBBR in the Summary of Regulation 18 Responses. The table pursues a consistent structure, initially grouping responses thematically, before responding to comments relating to specific Local Areas.

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No.	Reference ²	Summary of Issue Raised and Comments	Response	Action Required
001	13.18 (p. 136)	<p>Overall Methodological Approach</p> <p>The GBBR was a flawed and subjective process, and thus it had little weight, was incorrect and (some) suggested a more scientific method should have been used.</p>	<p>The methodology used in the GBBR was developed in line with the NPPF and in discussion with EBC, also incorporating a broad review of best practice (including consideration of approaches in neighbouring local authority areas). The approach was also corroborated through Duty to Cooperate commitments with the relevant authorities and therefore represents a robust strategy for the assessment of the Green Belt. The methodology incorporates specific criteria for each of the NPPF purposes assessed, utilising both quantitative and qualitative data, which are linked to each score. This provides a logical, transparent and suitably robust means of assessing each Local Area.</p>	No change.
002	13.21 (p.137)	<p>Definition of Local Areas</p> <p>Comments were received querying why it was considered appropriate to assess and subsequently define Local Areas of Green Belt (because many consider the Green Belt to be sacrosanct, and thus</p>	<p>The approach to identifying Local Areas was set out in the GBBR methodology and complied with the guidance in the NPPF in relation to “readily recognisable [boundaries that are] likely to be permanent”.³ This allows functional areas of Green</p>	No change.

² Paragraph reference and page number within the Summary of Responses document (July 2017).

³ National Planning Policy Framework, Para. 85

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		questioned the point of undertaking the GBBR at all).	Belt to be assessed. In relation to the broader point raised, as stated in the GBBR Methodology and Assessment Report (2016), the overarching aim of the GBBR is to provide evidence of how different areas perform against the NPPF purposes set out in national policy. Ultimately, the recommendations in the GBBR itself cannot automatically lead to the release of land from the Green Belt or the designation of new Green Belt. However, EBC may take the findings of the GBBR into account alongside other evidence in making decisions about possible changes to Green Belt boundaries, as part of a review of the Local Plan (in line with the NPPF). ⁴	
003	13.21 (p.137)	<p>Scoring of Local Areas</p> <p>The need to classify areas of Green Belt as weakly, moderately or strongly performing was also queried. It was considered that Local Areas were either performing / functioning as Green Belt or not and that a ‘sliding-scale’ was inappropriate. It was stated that this standard approach adopted by Arup and used by many other local authorities was not supported by national planning policy as there is no reference to weakly, moderately or strongly performing Green Belt in it. Others stated that Green Belt did not need to ‘perform’; it merely had</p>	While the methodology used in the GBBR was developed in line with the NPPF, it should be noted that the NPPF provides no guidance as to how Green Belt should be assessed. The methodology incorporated a broad review of best practice and precedent from other local authorities (as set out in sections 3.3-3.5 of the GBBR), and was also corroborated through Duty to Cooperate commitments, and therefore presents a robust strategy for the assessment of the Green Belt. Furthermore, scoring/classifying areas of Green Belt based on the extent to which they meet the NPPF purposes has been found to be a sound approach to	No change.

⁴ National Planning Policy Framework, Para. 83

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		to exist to fulfil its purpose, alongside other statements to this or similar effect.	assessing Green Belt during a number of Local Plan examinations, notably in the case of Cheshire East. ⁵	
004	13.22 (p.137)	<p>Identifying potential areas for release</p> <p>Building on comment no. 003, it was stated that even Local Areas considered to be weakly performing were, to an extent, still fulfilling the purposes of Green Belt and therefore should not be considered further for development. Comparison was made to other local authorities' Green Belt Studies where some areas were identified as not fulfilling any Green Belt purposes. It was stated that no such areas had been identified in Elmbridge Borough and therefore no amendments to the boundary were justified.</p>	The GBBR does not make recommendations for the release or creation of Green Belt, but identifies those Local Areas (or sub-areas within Local Areas) that perform weakly against the NPPF purposes and could be considered further by EBC through the wider plan-making process. Furthermore, the performance of Green Belt against the NPPF purposes will not determine, in itself, whether or not adjustments are made to Green Belt boundaries. EBC will determine whether, in accordance with the NPPF, there are any 'exceptional circumstances' that justify the Green Belt boundary to be altered through the preparation of the Elmbridge Local Plan.	No change.
005	13.23 (p.137)	<p>Purpose 1 and overall Green Belt value</p> <p>Other comments received stated that any assessment of Green Belt based solely on its contribution to its function, will find that sites adjacent to existing settlements will score highest in checking the unrestricted sprawl of a built-up area. It was stated that it was axiomatic that these areas are also likely to be the most sustainable for development, being close to existing services and facilities. On the basis of the methodology</p>	As set out in the GBBR Methodology (section 4.4.1) a Local Area must be "at the edge of one or more distinct large built-up areas" in order to fulfil Purpose 1; however, Assessment 1(b) then considers the extent to which these Local Areas prevent "the outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way". As such, it cannot be assumed that sites adjacent to large built-up areas will meet Purpose 1 strongly. Furthermore, restricting sprawl is only one of the	No change.

⁵ Inspector's Further Interim Views – Examination of the Cheshire East Local Plan Strategy (December 2015), para. 46.

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		employed it was suggested that the logical conclusions was that the more remote an area was from settlements the less value it would have.	Green Belt's five identified purposes (as set out in the NPPF ⁶). The GBBR Methodology considered Purposes 1-3 and reached a "composite judgement" with no weighting or aggregation attached to any of these purposes ⁷ ; as such, it is not a given that Local Areas adjacent to existing settlements will score the highest overall, nor can it be assumed that Green Belt areas distant from settlements have the least value.	
006	13.24 (p.137)	Composite scoring of Local Areas Some responses queried why the overall summary was based on the best of the three scores i.e. some areas rated moderately / strongly performing based solely on the score for Purpose 3, despite the acknowledgement that all Green Belt purposes should have equal weight.	The approach to providing a composite judgement across the NPPF purposes was developed on the basis that that each of the NPPF purposes is considered equally significant. Furthermore, there is no requirement for Green Belt to meet all the purposes. Thus, it was considered appropriate and robust to apply no weighting or aggregation of scores across the purposes.	No change.
007	13.25 (p.137)	Purposes 4 and 5 There were also concerns raised that only 3...out of the 5 purposes of Green Belt listed in the NPPF were used when assessing Local Areas, when all of them should have been used. An example of this was the fact that many residents stated that Stoke D'Abernon (being listed in the Domesday Book) was a historic settlement, and thus the criterion	While it is acknowledged that Elmbridge contains a variety of individual heritage assets, best practice (as set out in section 3.3 of the GBBR) indicates that the assessment of Purpose 4 relates to few settlements in practice, as the historic centres of many towns have been enveloped by modern day development. The role of the Green Belt primarily relates to protecting the uniquely rural or open settings of these historic	No change.

⁶ National Planning Policy Framework, Para. 80

⁷ Green Belt Boundary Review Methodology and Assessment (2016), section 4.3

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		<p>relating to preserving the setting of historic settlements should also have been utilised, or that the Green Belt does help with urban regeneration in Elmbridge, so that criterion should have used as part of the scoring methodology.</p>	<p>centres, which is reduced when there is no visual/physical connection between the Green Belt and these historic centres. Engagement with EBC during the development of the Methodology demonstrated no instances where the settings of historic town centres in Elmbridge are directly influenced by the Green Belt, thus it was considered appropriate not to assess this purpose in order to reflect local context.</p> <p>In relation to Purpose 5, while it is acknowledged that the Green Belt, as a whole, plays an important role in promoting the redevelopment of urban brownfield sites (by funneling development towards urban areas), this role would be best considered at broader level than assessed in the GBBR. At the Elmbridge scale, the Green Belt in its entirety meets this purpose equally (as acknowledged in the GBBR Methodology, section 4.4.5); thus, it is deemed robust to undertake no further assessment of individual Local Areas (which would not result in differentiation between the performance of different areas of Green Belt).</p>	
008	13.26 (p.137-8)	<p>Landscape quality and land function</p> <p>Objections to the GBBR were raised as no account was taken of landscape quality and the use / potential uses of the Green Belt which together, shape how the Green Belt is subjectively</p>	<p>In establishing the fundamental aim and purposes of Green Belt, the NPPF makes no reference to landscape quality. As such, the inclusion of landscape quality criteria was not judged to be a robust approach to assessing the performance of the Green Belt. However, in relation to Purpose 3, the GBBR</p>	No change.

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		experienced, how it functions and how overall, in contributes towards quality of life.	considered the extent to which Local Areas might be reasonably identified as ‘countryside’ / ‘rural’, taking into consideration land use and function.	
009	13.26 (p.137-8)	Planning positively for enhancement Reference was made to paragraph 81 of the NPPF and the obligation that Councils have to plan positively to enhance the Green Belt with opportunities to provide access, outdoor sport and recreation and to retain and enhance landscapes, visual amenities and biodiversity. It was stated that these points should have formed part of the assessment of Green Belt and that had these aspects been factored in, most of the Green Belt Local Areas identified as ‘weakly performing’ would be excluded from further consideration for development.	As identified in the response to comment no. 004, the GBBR does not make recommendations for the release or creation of Green Belt, but identifies those Local Areas (or sub-areas within Local Areas) that perform weakly against the NPPF purposes and could be considered further by EBC through the wider plan-making process. Such further consideration, made by the Council, will take into account paragraph 81 of the NPPF, however this did not fall within the scope of the assessment undertaken through the GBBR.	No change.
010	13.27 (p.138)	Historic reasons for designation of Green Belt It was also commented that the Council has not set out the historical reasons for the Local Areas being designated as Green Belt and what has changed since then to justify the change in status of the land from Green Belt to land being capable of providing new homes.	EBC will determine whether, in accordance with the NPPF, there are any ‘exceptional circumstances’ that justify the Green Belt boundary to be altered through the preparation of the Elmbridge Local Plan. However, it should be noted that, in preparing the Methodology for the GBBR, consideration was afforded to the history of the Green Belt designation in Elmbridge, and the original justification for the designation of the Metropolitan Green Belt. This was combined with consideration of how this role has evolved since its original designation (for example,	No change.

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			preventing the outward sprawl of large built-up areas beyond London as set out in section 2.1 of the GBBR).	
011	13.28 (p.138)	<p>Defining Local Areas</p> <p>Comments received stated that the GBBR was undertaken on the basis of an extreme interpretation of the NPPF and what is considered to be a defined and permanent boundary. In selecting to define boundaries using major existing and permanent man-made and natural features, it was stated that this over influenced the definition of Local Areas and also became a dubious factor in assessing performance. Furthermore, it was expressed that the over emphasises of major roads and railway lines had undervalued the durability of some long established boundaries and that the use of minor features to sub-divide large areas was applied inconsistently. In addition, some respondents felt that roads (including dual carriageways) and railway lines were not barriers between areas of Green Belt and thus should not be used to separate Green Belt areas into Local Areas.</p>	<p>As stated in the response to comment no. 002, the approach to identifying Local Areas, as set out in the GBBR Methodology, complied with the NPPF which states that when amending boundaries, these should be defined “using physical features that are readily recognisable and likely to be permanent”. In identifying the range of features that should be utilised to define Local Areas, consideration was afforded as to the types of feature that could reasonably be judged to accord with this requirement (including roads and railway lines). While it is acknowledged that the ‘parcelisation’ of land inevitably, to some extent, influences the scores attributed to Local Areas, the approach adopted in identifying weaker performing areas of Green Belt does not preclude the identification of smaller, weakly performing ‘sub-areas’ within wider Local Areas. Furthermore, this process also took into consideration the strategic role and function of Local Areas within wider Strategic Areas. As such, the parcelisation of the Green Belt had limited bearing on the findings and recommendations made through the GBBR, which were founded on the performance of the Green Belt against the NPPF purposes.</p>	No change.

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012	13.29 (p.138)	<p>Scale of Local Areas</p> <p>Adding to the issue of sub-division, it was felt that the huge disparity of size of defined local areas led to biased assessments and had allowed opportunities to be missed that might arise if smaller Local Areas were defined. It was felt by many that all of the areas should be broken down into smaller / more equally sized areas and that this would make the assessment of the Local Areas fairer.</p>	<p>As noted in the response to comments nos. 002 and 011, the approach to identifying Local Areas, as set out in the Methodology, complied with the NPPF in relation to defensible boundaries. While this resulted in some large areas, it provided an appropriate means of assessing functional areas of Green Belt. The assertion that this process was “biased” is not correct, as a consistent approach to identifying Local Areas was applied throughout the Borough, relying solely on defensible boundary features. Further, it cannot be assumed that had smaller areas been identified that they would have automatically scored less strongly against the NPPF purposes. Nevertheless, assessing smaller parcels of land is something EBC is currently working towards through the GBBR Supplementary Work.</p>	No change.
013	13.30 (p.138)	<p>Use of Ward boundaries</p> <p>A view was also expressed that the consultants’ assessment of Local Areas had been incorrect as these were based on ward boundaries (following the electoral review) and not the settlement boundaries as set out in the Core Strategy. It was considered that the Council had provided the consultants with incorrect information which formed the basis of many Local Areas in the Weybridge / Hersham areas as being assessed as weakly performing.</p>	<p>The approach to defining Local Areas was set out in the GBBR Methodology (specifically at section 4.2.2). Administrative boundaries (including wards) were not reviewed in identifying Local Areas, nor in developing the methodological approach (including defining the ‘large built-up areas’ for consideration in Purpose 1, or the ‘towns’ for consideration in Purpose 2).</p>	No change.

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014	13.31 (p.138)	<p>Definition of ‘sprawl’</p> <p>In regard to Purpose 1, some responses pointed to a need to reconsider the definition of sprawl. Reference was made to the definition of ‘sprawl’ as set out in the Collins Dictionary - ‘the part of a city that has not been planned and spreads out untidily over a large area’. As such, it is stated that ‘sprawl’ is a somewhat derogatory term and a complete anachronism when any major development is to be provided for and controlled by positively prepared development plans.</p>	<p>Notwithstanding the view expressed that the term ‘sprawl’ is an “anachronism”, checking the “unrestricted sprawl of large built-up areas” remains one of the purposes of Green Belt, as enshrined in the NPPF. The GBBR provides an objective assessment of the performance of the Green Belt against this purpose, based on the current situation as identified through desk-based and on-site assessment, and in developing the methodology it was considered neither appropriate nor pragmatic to consider the hypothetical merits of prospective development approaches in assessing different Local Areas. Furthermore, the use of the Oxford Dictionary definition in establishing the meaning of sprawl for the purposes of the assessment was considered entirely appropriate.</p>	
015	13.32 (p.139)	<p>Use of ‘Pass / Fail’ criteria</p> <p>It was also considered that as the purpose emphasised ‘checking’ sprawl the Review determined that any effective contribution of an area depended on it being on the frontier i.e. having a boundary on to the built up area. This resulted in a ‘gating switch’ whereby these criteria must be met (a ‘PASS’ given) before any scoring was subsequently applied. Furthermore, this approach was not considered appropriate as it was applied regardless of the size or shape of the Local</p>	<p>The methodology incorporated a review of best practice and precedent from other local authorities, and was also corroborated through Duty to Cooperate commitments, and therefore presents a robust strategy for the assessment of the Green Belt. While it is correct to state that the assessment did not pay regard to the size or shape of the Local Areas, the chosen approach was considered clear, transparent and consistent, and it should also be noted that particular nuances within Local Areas (i.e. differential performance against specific purposes) were taken into consideration when identifying the</p>	

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		<p>Area and so evaded the question of how much of the Local Area this point actually applied to. It was also considered by others to not be suitable as it did not appear to be carried forward as part of the final scoring of a Local Area, which they felt it should be.</p>	<p>recommended areas for further consideration. With regard to the specific comment around the “Pass/Fail” element of the assessment not being carried forward, this is not an accurate reflection of the adopted approach – all Local Areas which failed the Purpose 1(a) assessment were scored ‘0’ against Purpose 1(b), given they did not meet Purpose 1.</p>	
016	13.33-4 (p.139)	<p>Defining the ‘large built-up areas’</p> <p>The interpretations of other terminology used in the assessment of Purpose 1 were also deemed incorrect. It was considered that the lack of explanation in the NPPF and planning guidance as to how ‘built-up areas’ is interpreted has not necessarily led to a consistent categorisation or to a categorisation that accords with natural observations. For example, it is suggested that the continuous built up area of Surbiton / Esher / Fairmile is just as much as a large built up area as Walton-on-Thames, Weybridge and Hersham. Underpinning this suggestion is the statement that this part of the country is effectively a continuous built up area within which there are all of the usual land uses including areas of open space, some of which are designated Green Belt.</p> <p>Other inconsistencies that have been suggested is that if Chertsey and Addlestone (located in Runnymede Borough) are categorised separately</p>	<p>While the methodology used in the GBBR was developed in line with the NPPF, it should be noted that the NPPF provides no guidance as to how Green Belt should be assessed and does not define key terms used in the Green Belt purposes. The use of the settlement hierarchy (as set out in the Core Strategy) to define large built-up areas is considered justified in the absence of specific guidance. Furthermore, reflecting the role of Green Belt in restricting built-development, this was cross-checked qualitatively to identify where settlements form continuous large built-up areas; thus, it was verified that Surbiton does not form a continuous built-up area with Esher as the Green Belt continues to maintain separation between these settlements.</p> <p>With regard to neighbouring authorities, a consistent approach to identifying large built-up areas was utilised. This was then corroborated with these local authorities through Duty to Cooperate commitments, with all comments received taken into account when finalising the list of large built-up areas relevant to</p>	No change.

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		as large built up areas, then Fairmile must also be. Cobham and Oxshott were also considered to have been omitted from the list of large built-up areas. It was stated that both these areas should be included particularly as Bookham and Fetcham (in Mole Valley District) have been included, with neither of these areas being any larger than Cobham or Oxshott.	the assessment. Thus, the approach is deemed to be correct.	
017	13.35-6 (p.139)	<p>Consideration of boundary strength in Purpose 1 assessment</p> <p>In regard to the detailed assessment, it was considered by some respondents that too much emphasis had been placed on whether there is a durable or permanent ‘barrier’ existing somewhere. As with previous comments relating to defining Local Areas, it was accepted that guidance indicates that Local Areas can be delineated by certain barriers, but it was felt that just because such a physical barrier exists somewhere then the whole Local Area (that owes its existence to that barrier) should then, by Arup’s 6 own criteria (on Table 4.2), be downgraded to the lowest scores (1 or 1+). It was considered that the artificial Local Area of Green Belt, however large or small, which has been created by the presence of a road or railway, should not be just dismissed as not having value in preventing sprawl into open land or serving as a barrier at the edge of</p>	<p>The comment does not reflect the multiple considerations taken into consideration in reaching the Purpose 1(b) scores. In order to be considered a weakly performing Local Area (scoring 1 or 1+, depending on the strength of the inner Green Belt boundary), the Methodology states that a Local Area must be “almost entirely contained or surrounded by built development which forms part of a single built-up area and [with] limited connections to the wider Green Belt”. Thus, while the role of the outer boundary of a Local Area as a ‘barrier feature’ was a relevant consideration, equally important was the extent to which a Local Area was judged to be “contained or surrounded by built-development”. The latter consideration was key in determining the extent to which a Local Area prevented the ‘outward sprawl’ of a large built-up area. As such, it is considered that the approach does not place undue emphasis or weighting on the strength of boundaries, nor does it downgrade the importance of much of the Green Belt in Elmbridge in preventing sprawl (noting</p>	No change.

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		<p>a large built up area. It was concluded that this assumption completely downgrades a Local Area's intrinsic value in preventing sprawl and condemns large important Green Belt areas that are "on the front line" to little or no importance under Purpose 1.</p> <p>It was also expressed that the scoring judgements dominated on whether there is the existence or not of boundaries based on durable features was again an overzealous and interpretation and misapplication of national policy and guidance.</p>	<p>that just under half of Local Areas assessed scored moderately or strongly against this purpose).</p> <p>With regard to the latter comment, as discussed in the response to comment no. 011, the approach to identifying the strength of boundaries complied with the NPPF, with consideration afforded to the types of feature that could reasonably be judged to be "readily recognisable and likely to be permanent". It should be noted that the strength of the inner Green Belt boundary did not preclude the identification of any Local Area for further consideration by the Council. As such, the approach is considered clear and robust.</p>	
018	13.38 (p.139)	<p>Perceptual separation between settlements – Purpose 2</p> <p>Some respondents felt that the perception of separation of neighbouring towns and any distinct character and identity should not be determined by the distance between them, but must in part be a product of the particular character and role of the intervening area. It was suggested that by focusing solely on gaps between settlements which often meant a collection of communities, ignored the importance of separation between individual villages within such conurbations.</p>	<p>The approach to determining the performance of Local Areas against Purpose 2 specifically paid regard to a wider range of factors beyond distance. This is reflected in the Methodology, with the criteria used to score Local Areas against Purpose 2 referring specifically to the extent to which areas contribute to the visual or physical gaps between settlements, both perceptually and in terms of actual distance. Furthermore, each Local Area was subject to a site visit, which ensured the particular character and role of the Green Belt in maintaining separation between settlements was understood.</p> <p>With regard to the latter point, it should be noted that contribution to the separation of villages within conurbations is not identified in the NPPF as a</p>	No change.

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			purpose of the Green Belt; as such, it was not assessed as part of the GBBR.	
019	13.39 (p.140)	<p>Defining the ‘towns’ for the Purpose 2 assessment</p> <p>As with the interpretation of large built-up areas, it was also suggested that in the absence of what a ‘town’ is considered to be in national policy and guidance that this had led to an inconsistent application. It is stated that by virtue of its size and the facilities and services present, Fieldcommon cannot be properly regarded as a town.</p>	<p>As noted specifically in the comments, the NPPF provides no guidance as to how Green Belt should be assessed and does not define key terms used in the Green Belt purposes, including the ‘towns’ referred to in Purpose 2. As such, it is not clear how the approach could be considered “inconsistent” with the NPPF. Given Elmbridge’s tightly defined Green Belt boundaries, and the general absence of defined settlements which are ‘washed over’ in the Green Belt, considering all non-Green Belt areas as ‘towns’ in the context of Purpose 2 was considered robust and appropriate to the Elmbridge context. With regard to Field Common, given its distinct character and physical separation from surrounding settlements by open countryside, it was judged appropriate to identify it is a separate ‘town’ for the Purpose 2 assessment.</p> <p>With regard to neighbouring authorities, a consistent approach to identifying towns was utilised. This was then corroborated with these local authorities through Duty to Cooperate commitments, with all comments received taken into account when finalising the list of large built-up areas relevant to the assessment.</p>	No change.

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020	13.42 (p.140)	<p>Approach to assessing Purpose 3</p> <p>Some respondents suggested that it was incorrect to assess the built-form of a Local Area and to consider the extent to which the ‘openness’ and ‘rural’ qualities of Green Belt area have been maintained. It was felt that this approach failed to consider the effectiveness of the Local Area as a barrier that continues to prevent encroachment. It was also suggested that the assessment of ‘semi-urban character’ should not include publicly accessed green space, green corridors, country parks or local nature reserves. Such features were considered to be more rural in nature.</p>	<p>The methodology incorporated a review of best practice and precedent from other local authorities, and was also corroborated through Duty to Cooperate commitments, and therefore presents a robust strategy for the assessment of the Green Belt. Specifically with respect of Purpose 3, in developing the Methodology for the GBBR, regard was paid to the Oxford Dictionary definition of the term ‘encroachment’: <i>Advance gradually beyond usual or acceptable limits</i>. Given rural areas are generally characterised by their lack of built development (physical openness), and particular land uses generally associated with rural areas, the choice of criteria for the Purpose 3 assessment is therefore considered robust and appropriate.</p> <p>With regard to the definition of the ‘semi-urban’ category, it should be noted that the specific land uses identified are indicative and not designed to be exhaustive (i.e. “land uses <u>might include</u>...”). Furthermore, the presence of one (or more) of the identified land uses did not automatically result in a Local Area being identified as weakly performing against Purpose 3. For each Local Area, a judgement of performance was made, taking into consideration land use, morphology, context, scale and links to the wider Green Belt, as set out in the GBBR Methodology.</p>	No change.

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No.	Reference ²	Summary of Issue Raised and Comments	Response	Action Required
021	13.43 (p.140)	<p>Bias against smaller areas</p> <p>Comments were also made that suggested that this element of the review showed bias against the potential release of smaller areas. For example, the percentage of built form discriminated against man-made structures including community assets which favoured the larger Local Areas.</p>	<p>The approach to the Purpose 3 assessment was applied consistently across all Local Area; thus, the claim that there was an element of bias shown against smaller areas of Green Belt is incorrect. Furthermore, the presence/lack of community facilities was not considered as part of the assessment, and the percentage built-form assessment reflected all areas defined as ‘built’ in Ordnance Survey MasterMap data. This was considered a robust and accurate means of assessing openness.</p>	No change.
022	13.44 (p.140)	<p>Purpose 3 score criteria</p> <p>Focusing on the scoring, it was suggested that the percentages of built-form contained in Table 4.5 (to score 5 less than 3% built form, to score 4 less than 5% and to score 3 less than 10%) are too strict. Amendments were suggested that to score 4 the % of built form should be increased to “less than 10%” and to score 3 the % of built form should be “less than 15%”. Consequently the % to score 2 should be increased to “less than 18%”.</p>	<p>The identification of specific built-form thresholds in judging the performance of Local Areas against Purpose 3 was based on Arup’s previous experience of undertaking Green Belt Assessments in local authority areas with a similar context to Elmbridge (for example, Runnymede). No evidence is presented as to why the alternative thresholds suggested would be more suitable. Notwithstanding this, it should be noted that the defined criteria for the Purpose 3 assessment afforded a degree of flexibility in assigning scores to Local Areas, reflecting the potential for individual nuances and the judgement-based nature of the assessment.</p>	No change.
023	13.45-6 (p.140-1)	<p>Use of consultants</p> <p>A few comments were received questioning the independence of Arup. Their own website was</p>	<p>Arup is an independent firm of designers, planners, engineers, consultants and technical specialists. Our ownership structure – the firm is held in trust on behalf of its employees – ensures that Arup retains its</p>	No change.

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		<p>referenced in that it states they are international engineers. Concern was also raised that they tended to be work on behalf of private companies including developers. It was suggested that this caused a conflict of interest and that their subjective nature was tainted. A few comments also stated that as Arup were not a local company to the area then they had limited knowledge of Green Belt in Elmbridge, of ‘local issues’ and how the Green Belt was / is used by the various communities.</p> <p>It was suggested that in order to achieve a consensus of how Local Areas function in terms of the purpose of the Green Belt, local residents and other amenity groups should form part of a review panel, and that the GBBR should be subject to ‘independent audit verification’, but without any detail as to who should carry this out, or how a suitable body would be selected to do this. There was also stated suspicion that the Review had been ‘fixed’ or set out to meet pre-drawn conclusions.</p>	<p>independent spirit and remains a learning organisation. Our philosophy is based on acting honourably in our dealings with our own and other people and our Ethics Policy⁸ addresses the responsibility of each of our employees with regard to the fiduciary duties they owe. Arup has a contractual obligation to EBC to immediately bring any potential conflict of interest to their attention; no such conflict has been identified during the course of the commission.</p> <p>Although Arup’s offices are not based in Elmbridge, the GBBR involved a suitably exhaustive review of the local context relevant to the Study. Furthermore, in order to understand the role and performance of the Green Belt, each Local Area was subject to a site visit by two members of the project team.</p> <p>The GBBR provided an impartial, objective assessment of all Green Belt in Elmbridge, and its findings were not influenced by external factors (e.g. wider Local Plan considerations such as the “Call for Sites”, or the opinions of Council officers).</p>	
024	13.48-58 (p.141-2)	<p>Local Area 14</p> <p>The vast majority of comments received strongly disagreed with the overall assessment of Local Area 14 as ‘weakly performing’. It was considered</p>	<p>Local Area 14 was assessed against the published methodology for the GBBR, the findings of which are considered to remain correct. While it is noted that there is a difference of opinion on the overall</p>	No change.

⁸ <https://www.arup.com/our-policies>

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		<p>by the majority of residents and other local amenity groups to be highly / strongly performing Green Belt....</p> <p><i>Full summary available at Appendix A.</i></p>	<p>approach to assessing Green Belt, as set out in a number of previous responses, the Methodology incorporated a broad review of best practice and precedent from other local authorities, and was also corroborated through Duty to Cooperate commitments; it therefore presents a robust strategy for the assessment of the Green Belt.</p> <p>With regard to comments raised around the definition of the ‘large built-up areas’ for Purpose 1, and the ‘towns’ for Purpose 2 (i.e. the point that Cobham, Stoke D’Abernon and Oxshott are “distinct communities”), these comments are dealt with in responses 016 and 019 respectively.</p> <p>In response to the specific comment that the assessment “must have largely been viewed from a map”, it should be noted that the assessment utilised a mixture of desk-based and site-based assessment. In order to understand the role and performance of the Green Belt, each Local Area (including Local Area 14) was subject to a site visit by two members of the project team.</p> <p>It is also noted that comments were raised around the Local Area’s score against Purpose 3. It be noted that the defined criteria for the Purpose 3 assessment afforded a degree of flexibility in assigning scores to Local Areas, taking into consideration both the deemed character and physical openness. This reflected the potential for individual nuances and the</p>	

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			<p>judgement-based nature of the assessment. In this instance, the characteristics as observed on site were judged to outweigh the relatively limited built-form present within the Local Area.</p> <p>A number of comments are raised around the desirability and suitability of Local Area 14 for development. It should be noted that the GBBR makes no recommendations around the developability of sites, and that findings and recommendations are limited specifically to the performance of areas against the Green Belt purposes.</p>	
025	13.59-13.67 (p.142-3)	<p>Local Area 20</p> <p>The vast majority of comments received strongly disagreed with the overall assessment of Local Area 20 as ‘weakly performing’. It was considered by the majority of residents and other local amenity groups to be highly / strongly performing Green Belt...</p> <p><i>Full summary available at Appendix A.</i></p>	<p>In line with the response to comment no. 024, Local Area 20 was assessed against the published methodology for the GBBR, the findings of which are considered to remain correct. Furthermore, the methodology is considered appropriate and robust.</p> <p>While the comments relating to the role of Local Area 20 as a “green corridor” are noted, this is a separate consideration to Green Belt performance (which the Study set out to assess). Similarly, notwithstanding the legal status of the Ribbon Development Act (1935), the Study took into consideration current national legislation/policy and local policy, but only in relation to Green Belt in line with the aims of the Study.</p>	No change.

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			<p>While comments around the variable openness and distribution of built form around the Local Area are acknowledged, it should be noted that the comments raised broadly align with the detailed assessment commentary set out in the Local Area pro-forma in Annex Report 2. However, this was balanced against the overall character of the Local Area, taking into account evidence of previous encroachment, the influence of surrounding development, and links to the wider Green Belt, all of which are judged to be relevant considerations in the overall judgement of performance against Purpose 3.</p> <p>Responding to the comments around the accuracy of the percentage built form, the assessment reflected all areas defined as ‘built’ in Ordnance Survey MasterMap data. This was considered a robust and accurate means of assessing openness.</p>	
026	13.68-79 (p.144-5)	<p>Local Area 58</p> <p>A number of comments received agreed with the Strategic Assessment and the identification of Local Area 58 forming part of the wider swathe of Green Belt around London forming what was referred to in the Review as Strategic Area A. The identification of Strategic Area A performing “very strongly” against the first two purposes of Green Belt was supported...</p>	<p>In line with the response to comment no. 024, Local Area 58 was assessed against the published methodology for the GBBR, the findings of which are considered to remain correct. Furthermore, the methodology is considered appropriate and robust.</p> <p>In response to the comments raised around Purpose 1, while the view was expressed that the Local Area forms the “front line in preventing London’s sprawl”, based on the identification of Long Ditton and Thames Ditton as part of the large built-up area of</p>	No change.

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		<i>Full summary available at Appendix A.</i>	<p>Greater London as defined in the Methodology (as they have historically coalesced), the Local Area does not restrict “sprawl” as it is bounded to the west, north and east by existing development, and the A309 forms a significant physical and visual barrier between this area and the wider Green Belt to the south. This results in the identification of the Local Area as ‘enclosed’, based on the definition established in the Methodology.</p> <p>With regards to the potential for “pressure to develop for housing areas immediately to the south of the road”, it should be noted that consideration was afforded to the role of Local Area 58 in the context of the wider Green Belt Strategic Area A. This (section 6.1.8 of the Report) states that the Local Area “has already suffered encroachment and is disconnected from the wider countryside”, but acknowledges that the wider Green Belt to the south continues to meet the purposes strongly. Furthermore, the area to the south of the A3 is not recommended for further consideration as it was found to meet the NPPF purposes strongly.</p> <p>With regard to comments raised around the Local Area’s role in maintaining the “distinct communities” of Long Ditton and Thames Ditton, response 019 describes how the distinct ‘towns’ for Purpose 2 were identified.</p>	

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			<p>While the comments relating to the role of Local Area 58 as a “green lung” are noted, this is a separate consideration to Green Belt performance (which the Study set out to assess).</p> <p>While the comments around the accuracy of the percentage built form are noted, the assessment reflected all areas defined as ‘built’ in Ordnance Survey MasterMap data. This was considered a robust and accurate means of assessing openness. Furthermore, it should be noted that the defined criteria for the Purpose 3 assessment afforded a degree of flexibility in assigning scores to Local Areas, reflecting the potential for individual nuances and the judgement-based nature of the assessment.</p>	
027	13.80-82 (p.145-6)	<p>Local Areas 36 and 37</p> <p>Some respondents said that they could see why the Local Areas were not strongly performing in Green Belt terms for example, they did not provide a significant gap between settlements. Two differing views then emerged. Some stated that this area should be looked at for additional residential development as it could accommodate additional housing and was close to existing settlements, and that parts of the area previously had dwellings on. Other respondents stated that regardless of the area performing weakly, it should not be built upon. It</p>	<p>In line with the response to comment no. 024, Local Areas 36 and 37 was assessed against the published methodology for the GBBR, the findings of which are considered to remain correct. Furthermore, the methodology is considered appropriate and robust.</p> <p>A number of comments are raised around the desirability and suitability of Local Areas 36 and 37 for development – it should be noted that the GBBR makes no recommendations around the developability of sites, and that findings and recommendations are limited specifically to the</p>	No change.

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		<p>was felt that the narrow strip would provide only a small amount of houses, with poor access onto a busy main road.</p> <p>Some respondents disagreed with the assessment that the two Local Areas were weakly performing as they provided a clear boundary between Burwood Park / Hersham and Weybridge. It was also stated that there are large amounts of wildlife in the areas and that the land is well used by local residents for walking, dog walking and recreation. It was suggested as an area that should be designated as a Local Green Space.</p> <p>In contrast however, a small number of responses said this area should be looked at for additional residential development as it was a weakly performing area of Green Belt that could accommodate additional housing, was located closely to existing settlements, and parts of it had had dwellings on it in the past.</p>	<p>performance of areas against the Green Belt purposes.</p> <p>The suitability of Local Areas for development will be for the Council to consider alongside other suggestions for allocation / designation such as Local Green Space.</p>	
028	13.83-4 (p.146)	<p>Local Area 70</p> <p>This Local Area received a number of comments stating that it should not be developed due to the variety of wildlife it hosts, as well as its function as a flood plain / soakaway. There was also concern about the loss of recreational uses within the area, including the park in the south western corner (which was suggested as an area that could</p>	<p>While the comments are acknowledged, it should be noted that the GBBR makes no recommendations around the developability of sites, and that findings and recommendations are limited specifically to the performance of areas against the Green Belt purposes.</p> <p>The suitability of Local Areas for development will be for the Council to consider alongside other</p>	No change.

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		<p>potentially be designated as a Local Green Space) along with the facilities at Imber Court.</p> <p>Others stated that as it was a weakly performing Local Area it should be considered as an alternative location for development to the three Key Strategic Areas.</p>	<p>suggestions for allocation / designation such as Local Green Space.</p>	
029	13.85-88 (p.146-70)	<p>Suggested 'sub-divisions' of Local Areas</p> <p>In addition to the general comments received regarding the GBBR methodology, a number of responses also raised site specific comments. The majority of these were made by landowners and/or their representatives promoting land for future development. As part of their submissions alternative assessment and / or 'scoring' against the GBBR criteria was suggested. This was on the basis that if the Local Area was sub-divided, the overall assessment of the promoted site would be weak in comparison to the remaining, wider Local Area / Green Belt.</p>	<p>While it cannot be assumed that had smaller areas been identified that they would have automatically scored less strongly against the NPPF purposes, assessing smaller parcels of land is something the Council is currently working towards through the GBBR Supplementary Work. As such, it would not be appropriate to provide any further response to this general comment.</p>	<p>No change.</p>

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APPENDIX A: FULL SUMMARIES OF LOCAL AREA SPECIFIC RESPONSES

Local Area 14

General Comments:

The vast majority of comments received strongly disagreed with the overall assessment of Local Area 14 as ‘weakly performing’. It was considered by the majority of residents and other local amenity groups to be highly / strongly performing Green Belt.

It was stated that any development of the site would impact on the fundamental aim of Green Belt, to protect openness and to maintain permanence of the Green Belt. The point was also made that many times in the past 20-30 years there has been severe pressure by developers and /or landowners to put forward parts of this area as suitable for development usually at the Local Plan process (first in 1992). It was stated that these pressures were strongly resisted by the Council on Green Belt grounds and that without continual resistance, areas facing Blundel Lane would very soon be developed with very likely low density housing.

Purpose 1 – checking the sprawl of large built up areas

Linking back to the responses made as to the definitions used within the Review, it was again stated that both Cobham and Oxshott should be classified as separate large built-up areas. Supporting this opinion was the statement that when travelling east along Blundel Lane one is leaving a substantial urban area and the open area is preventing further development along the road into Oxshott and its village core. If the definition were amended, the Local Area would then ‘Pass’ the first criteria of Purpose 1 and, would continue to be assessed against the second element of Purpose 1.

Other comments received relating to Purpose 1 stated that Local Area 14 has strong links to Local Area 10, and that the presence of the railway line and Blundel Lane should not mean it is weakly performing in comparison to Local Area 10. It was also stated that the development of the Local Area would result in urban sprawl and the spread of settlements away from the services provide in the designated centres.

Purpose 2 – to prevent neighbouring towns from merging

The GBBR states that the Local Area meets Purpose 2 weakly as it is “nearly fully enclosed within the settlement footprint of Cobham... playing a less than essential role in preventing coalescence with Leatherhead and Fetcham”.

Criticism of the Review was received in regard to this assessment stating that the consultants clearly do not know the area and that their assessment must have been largely viewed from a map. It was stated that on the ground the situation is entirely different and that the Local Area is not enclosed within the footprint of Cobham. The Local Area is considered to be a distinct entity in its own right stretching from the north along Fairmile Lane with open views south to and beyond the office

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complex and to the south stretching from the edges of Stoke D'Abernon along the road east to the outskirts of Oxshott village.

Related to the above point are the significant number responses that stated that Cobham, Stoke D'Abernon and Oxshott are distinct communities. Reference to the Council's own Flood Risk Assessment recognising them as separate entities was also made along with references to their distinct 'cultures', identities and histories. As such, removal of the Local Area from the Green Belt would almost certainly lead to the merging of Oxshott with Stoke D'Abernon and Cobham, and because of this, the Local Area was performing strongly in keeping these settlements separate. The fact that the GBBR referred to Cobham and Oxshott as one settlement / area was stated as evidence of the inaccuracy of the report and that this showed that it should not be given significant weight or be used by the Council as part of its evidence base.

It was felt that the description that fits this area under Table 4.4 of the assessment criteria is "a wider gap between non Green Belt settlements ... where the overall openness and the scale of the gap is important to prevent merging" or "an essential gap between non Green belt settlements where development would significantly reduce the perceived or actual distances between them."

Purpose 3 – to assist in safeguarding the countryside from encroachment

A number of comments, some including photographs, were received stating that the area is largely rural and notwithstanding the office complex / residential redevelopment at Knowle Park, has limited built form. A number of responses queried the scoring attributed with reference to Table 4.5 of the Review stating that the Local Area should score a 4 or 5 under this purpose (the range of built form suggested on the Local Area ranged from 2.5 to a little over 5%).

Other points made included the criticism that the countryside was assessed as highly fragmented. It was commented that there are in fact large open areas of land with mostly non-intrusive boundaries. The comment on "managed status" was only considered to be partly true in regards to Knowle Park but that it still presents an attractive open park-scape fully appropriate in the Green Belt.

Finally, the description of Local Area 14 as "semi-urban" was also considered to be highly subjective and untrue. Responses stated that it was semi-rural or just rural and that the nature of the area, and its uses incidentally represent considerable obstacles to the delivery of housing.

Local Area 20

General Comments:

The vast majority of comments received strongly disagreed with the overall assessment of Local Area 20 as 'weakly performing'. It was considered by the majority of residents and other local amenity groups to be highly / strongly performing Green Belt.

Some comments did however accepted that this site is likely to be available based on the history of the site and its ownership. It was also accepted that this site provides little benefit to the purpose of the Green Belt, due to its location between the A3 Esher By-Pass and existing residential development at Cobham.

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Purpose 1 – checking the sprawl of large built up areas

Linking back to the responses made as to the definitions used within the Review, it was again stated that both Cobham and Oxshott should be classified as large built up areas. If the definition were amended, the Local Area would then ‘Pass’ the first criteria of Purpose 1. In regard to how the Local Area would then be assessed it was stated that the area is viewed as a very largely open area stretching away north from the main road and that the A3 cannot be seen as it is constructed in a cutting. It was generally felt that too much emphasis and importance had been placed on the A3 as a barrier to preventing urban sprawl, with some respondents stating that roads do not separate areas of Green Belt from others.

Comments continued that Local Area 20 is essentially part of a largely open corridor that runs on one or both sides of the road all the way from north Cobham including Cobham Rugby Sports fields north to Esher Commons finally ceasing only after Claremont Gardens. The Local Area was therefore considered to be a vital component of this green corridor and for this purpose alone should be retained as Green Belt. It was also stated that the Local Area should be valued for its own sake and therefore has importance in preventing outward sprawl from the urban development which is already contained by the Portsmouth Road.

Other comments received stated that the development of the Local Area would result in urban sprawl and the spread of settlements away from the services provide in the designated centres. Respondees also stated that as Local Area 20 formed part of Strategic Area B, what is said about the Strategic Area must have some bearing.

Purpose 2 – to prevent neighbouring towns from merging

A mixture of comments were received in regard to the role the Local Area plays in preventing towns / settlements from merging. A number of comments stated that the Local Area did not play an important role with some respondents agreeing that its contribution is limited in terms of the overall gap between Cobham and Hersham. Others felt however, that the Local Area prevents the merging of Cobham and Esher (along the Portsmouth Road (A307)) and Hersham. It was stated that the development of the Local Area Development would contravene the Ribbon Development Act (1935) which is still in force.

Purpose 3 – to assist in safeguarding the countryside from encroachment

The statement that the Local Area is “heavily influenced by urban developments” and other uses was disputed by those responding to the consultation. It was stated that uses that are directly adjacent, and therefore outside of the Local Area such as residential dwellings to the west and east do not reduce the openness and that this was commonplace along the borders of any Local Area and the settlement areas.

The statement that ‘the parcel is tightly bounded by the A307 to the south and the A3 to the north, both of which detract audibly and visually from the sense of rurality’, was also a point of contention. Comments stated that this was only true up until a point, and that on the ground the conclusions draw may be different from a desk-top / map based assessment. It was also stated that the Local Area forms part of a wide expanse of open countryside to the north and that as the A307 presents a strong and defensible boundary already, this should continue to contain the built up area of Fairmile.

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Local Area 58

General comments:

A number of comments received agreed with the Strategic Assessment and the identification of Local Area 58 forming part of the wider swathe of Green Belt around London forming what was referred to in the Review as Strategic Area A. The identification of Strategic Area A performing “very strongly” against the first two purposes of Green Belt was supported.

However, the vast majority of comments received strongly disagreed with the overall assessment of Local Area 58 as ‘weakly performing’. It was considered by the majority of residents and other local amenity groups to be highly / strongly performing Green Belt. It was stated that any development of the site would impact on the fundamental aim of Green Belt, to protect openness and to maintain permanence of the Green Belt.

Concern was raised that any development of Local Area 58 will lead before long to pressure to develop adjoining Green Belt sites. In particular, it was felt that there will inevitably be pressure to develop parts of the north of Local Area 34, both east and west of Woodstock Lane South. Also mentioned was that Area 58 is very similar to Area 34 and yet the scoring differs and that Arbrook Common was described as deserted most of the time in comparison to Parcel 58.

Purpose 1 - checking the sprawl of large built up areas

A significant number of comments strongly opposed the assessment of Local Area 58 in regards to Purpose 1. It was stated that the position of the area immediately adjacent to the urban area of Long Ditton, Thames Ditton and parts of the Borough of Kingston Upon Thames means that it plays a vital role in checking the unrestricted sprawl of large built up areas, in this case South West London. The area was stated as forming the immediate “front line” in preventing London’s sprawl continuing further south. Such emphasis on the A309 checking any further urban sprawl was believed to be much exaggerated and the reasoning flawed. It was felt that if the area to the north of the main road was removed from the Green Belt and built on there would be considerable pressure to develop for housing areas immediately to the south of the road.

It was also strongly stated that Long Ditton was not ‘enclosed’ within the large built up area of Greater London (it is not possible to be so on three sides out of four) or that Long Ditton formed part of the Greater London built up area. Rather, Long Ditton was its own separate area from Greater London with its own community and marked change in urban character between Surbiton and Long Ditton. It was felt that the development of the area would create significant urban sprawl with the area becoming one large urban landscape with no open space separating Long Ditton from Hinchley Wood, London and areas such as Surbiton, Chessington & Hook. It is felt by many respondents that the whole Local Area performs a vital part of the ‘green lung’ entry into this part of Elmsbridge from London and that it provides a rural gateway / transition between London and Surrey.

On the basis of the above it was felt that Local Area 58 should be given a higher score (strongly performing) and be offered a higher protection.

Purpose 2 – to prevent neighbouring towns from merging

A significant number of respondents also disagreed with the assessment of Local Area 58 in regards to Purpose 2. It was felt that the statement that the area ‘makes only a very limited contribution to

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the overall gap between Long Ditton and other areas' was incorrect. Comments received stated that the assessment of the role that the Local Area plays in providing a gap between settlements was incorrect in focusing on Long Ditton and Claygate. Rather the importance of the Local Area in providing a gap between settlements should have been considered in the context of the area to the east and west – the gap between Long Ditton and Hinchley Wood, and again, also between Long Ditton and Chessington / Hook / Surbiton / London in general.

The general gap was considered by respondents to be 'essential' in its role of maintaining existing settlement patterns, and that removal of this Local Area from the Green Belt and subsequent development would severely compromise these settlements.

On the basis of the above it was felt that Local Area 58 should be given a high level of protection.

Purpose 3 – to assist in safeguarding the countryside from encroachment

Comments received in regards to Purpose 3 queried whether it was correct to base the assessment on the level of built-form that had occurred previously as a result of previous encroachments and which reflected the sensitive, fragmented nature / configuration of the area.

It was stated that the built-form was erroneous and that there were in fact very few so called 'built developments' within the 67 hectares of land. Rather than being seen as 'semi-urban', the Local Area is considered by respondents to be 'semi-rural'. Comments received also stated that the built form was generally located / confined to the edges of the Local Area and that as the area is countryside, any development in it would be encroachment of the countryside in of itself.

Continuing on scoring aspect and the built form assessment, a number of comments were also received that stated that by ARUP's own assessment, the built form percentage of 7.5% would score a 3 as it contains less than 10% built form. The point was made that other areas e.g. Local Area 62, has a higher percentage built-form but was still deemed to be more rural.