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Appendix A

Glossary of Terms

Appendix B

Pro-Forma: Strategic Green Belt Area Assessment

Appendix C

Pro-Forma: Local Green Belt Area Assessment

Abbreviations

AONB	Area of Outstanding Natural Beauty
EBC	Elmbridge Borough Council
DCLG	Department for Communities and Local Government
LDS	Local Development Scheme
LSS	Local Strategic Statement
NPPF	National Planning Policy Framework
PAS	Planning Advisory Service
PINS	Planning Inspectorate
PPG	Planning Policy Guidance Notes
RPG	Regional Planning Guidance
SHMA	Strategic Housing Market Assessment
SPA	Special Protection Area
SPD	Supplementary Planning Document

1 Introduction

1.1 Background

Ove Arup & Partners Ltd (Arup) has been appointed by Elmbridge Borough Council (EBC) to undertake a Green Belt Boundary Review as part of the evidence base to support the Elmbridge Local Plan. The need for the study has arisen from recent discussions with regard to local plans adopted prior to the introduction of the National Planning Policy Framework (NPPF) and with an evidence base that predates this change in national policy. The Review will form a key part of the evidence base examining the constraints of development across the Borough. It will be used in any decision making on the need to undertake a full or partial review of the Council's Local Plan.

The Green Belt Boundary Review assesses the Elmbridge Green Belt against the purposes of Green Belt as defined by the NPPF. The assessment has been undertaken in two interlinked parts: first, a strategic review of the Elmbridge Green Belt within the wider Metropolitan Green Belt context; second, a local review of identified Green Belt parcels to identify the relative performance of the Green Belt against the NPPF defined purposes of the Green Belt.

1.2 Purpose of the Review

The purpose of a Green Belt Boundary Review is to provide evidence of how different areas perform against the Green Belt purposes set out in national policy. Planning authorities may then take this into account alongside other evidence in making decisions about possible changes to Green Belt boundaries. A boundary revision can take the form of an expansion or a contraction. However, equally a Green Belt Boundary Review may conclude that no changes are appropriate.

The Green Belt Boundary Review provides an independent and objective appraisal of all existing Green Belt land in Elmbridge, as well as land outside the Green Belt boundaries which may be designated. This encompasses the Council's remaining reserve housing sites at the edge of the urban areas, as well as other open land around the edge of settlements.

The Review responds to the Council's brief, which is clear in its aspirations to:

- Undertake a comprehensive assessment 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.

1.3 Report Structure

Following this introduction, this report is structured as follows:

- Chapter 2 sets out the context for this Green Belt Boundary Review, including the history of the Green Belt as a whole and specifically within Elmbridge.
- Chapter 3 provides the policy context at the national and local level, together with a summary of Green Belt Reviews undertaken by neighbouring authorities.
- Chapter 4 sets out the methodology for the Review.
- Chapter 5 sets out the key findings of the Review.
- Chapter 6 provides recommendations for further work.
- Chapter 7 sets out the conclusions of this Review.
- Annex Report 1 contains the Strategic Green Belt Area Assessment proformas.
- Annex Report 2 contains the Local Green Belt Area Assessment pro-formas.

Elmbridge Green Belt Boundary Review 2 Context

2.1 **History of the Green Belt**

The concept of Green Belt dates back to the origins of the modern British planning system and is frequently credited as one of the most notable achievements of the planning system, halting the outward 'sprawl' of London into the countryside. During the 19th century, the rapid expansion of the railways had suddenly brought once remote settlements within commuting distance of central London; Elmbridge was no exception.

During the previous centuries, encouraged by the construction of Oatlands Palace by Henry VIII, the area became home to a great number of other country estates, including Charles Hamilton's fine landscaped park at Painshill near Cobham. Many of these were broken up after the arrival of the railways in the 1840s, which sparked a property boom in areas within close proximity of the new stations. Sir John Easthope, the Chairman of the London and Southampton Railway, acquired significant landholdings in Weybridge and subsequently sold it off for housing development. East and West Molesey witnessed similar growth following the opening of the line to Hampton Court in 1849, whilst the formerly isolated villages of Claygate and Oxshott saw rapid growth in the late 19th century¹. Overall, the population increased from 6,500 to 34,500 over the course of the century².

Particularly after the war, concerns grew about the rapid change of rural areas around London and the impact of urban sprawl. Surrey played a particularly important role in the development of the early concept of Green Belt. The Surrey County Council Act 1931 created its pre-cursor – it made provision for the County Council to purchase rural land for quiet enjoyment to form a Countryside Estate, which remains in the ownership of the authority today³. Subsequently, the Metropolitan Green Belt, first suggested by Raymond Unwin in 1933 as a green girdle which was embodied in the Green Belt (London and Home Counties) Act 1938 and Sir Patrick Abercrombie's Greater London Plan of 1944 (later established nationwide in the Town and Country Planning Act of 1947), curtailed the further unchecked growth of London's urban area. This original Green Belt was six to ten miles wide and subsequently deemed as insufficient to restrict development in the widening commuter belt.

¹ A Brief History of Elmbridge, Elmbridge Museum (http://www.elmbridgemuseum.org.uk/local/).

² Amelebrige to Elmbridge: The Biography of a Borough, The Elmbridge Hundred (http://www.elmbridgehundred.org.uk/history-of-elmbridge/).

³ Surrey County Council (2013) County Council Meeting – 19 March 2013, Minute.

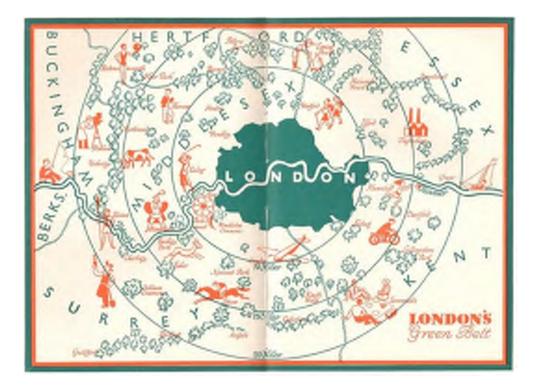


Figure 2.1 Extract from SPB Mais's book published in 1939 celebrating the 50th anniversary of the London County Council

Circular 42/55, released by government in 1955, encouraged local authorities to establish their own Green Belts. Following this, the Surrey Development Plan of 1958 was the first plan to formally designate Metropolitan Green Belt in Surrey, including in Elmbridge. The Circular set out three main functions of the Green Belt:

- To check the growth of a large built-up area;
- To prevent neighbouring settlements from merging into one another; and
- To preserve the special character of a town.

Circular 50/57, published in 1957, distinguished the inner and outer boundaries of Green Belts (with Elmbridge located in the inner edge of the Metropolitan Green Belt) and established the importance of defined and detailed permanent boundaries.

In 1962, the Minister of Housing and Local Government published the advice booklet titled 'The Green Belts'. The booklet recorded that the last of the Home Counties development plans had been approved in 1959, enabling the completion of the Metropolitan Green Belt. An updated 'The Green Belts' booklet was published in 1988.

The Surrey Structure Plan 1978 considered a Green Belt distance of approximately 19-24 km (12-15 miles) sufficient to contain the outward sprawl of London. Following local government reorganisation in 1972 and the merger of

Esher Urban District Council with Walton and Weybridge Urban District Council to create the Borough of Elmbridge, the Green Belt boundaries were subsequently reviewed during the preparation of the 1993 Local Plan, which established precise boundaries throughout the Borough for the first time⁴.

Circular 14/84 was published by the Government in 1984 and introduced two new Green Belt objectives:

- Assisting in urban regeneration; and
- Safeguarding the countryside from further encroachment.

In January 1988, the Government introduced a series of policy statements which were known as Planning Policy Guidance Notes (PPGs). PPG2 on Green Belts was published in 1988 and reiterated the advice contained in previous Green Belt Circulars.

Regional and county policies in the form of Regional Planning Guidance for the South East 1994 (RPG9) and the Surrey Structure Plan 1994 further supported the Green Belt as a tool for urban regeneration.

RPGs and PPGs published throughout the 1990s and 2000s reiterated the importance of the Green Belt in preventing sprawl⁵ and recognised additional functions, including their role in urban renaissance⁶ and sustainable transport⁷.

It is important to note that the South East Plan, which was revoked in 2013, made no reference to Green Belt boundary revisions in the urban areas of Elmbridge, instead focusing growth on Guildford, Woking, and Reigate and Banstead.

RPGs and PPGs were replaced by the NPPF in 2012 which reiterated that the fundamental aim of the Green Belt was to prevent urban sprawl by keeping land permanently open.

2.2 Previous Green Belt Reviews

There have been no recent Green Belt Boundary Reviews within the Elmbridge area.

⁴ Excluding Brooklands, whose Green Belt boundaries were established in the Brooklands Local Plan First Alteration in January 1995.

⁵ Government Office for the South East (2001) *Regional Planning Guidance for the South East (RPG 9)*.

⁶ Government Office for London (1996) *Regional Planning Guidance for London Authorities* (*RPG3*).

⁷ Department of the Environment, Transport and the Regions (2000) *Planning Policy Guidance 3:* Housing.

3 Policy Context

3.1 National Context

At the national level, the NPPF⁸, national Planning Practice Guidance⁹ and ministerial letters provide the policy and guidance context for the role and function of the Green Belt. The following sections summarise the current position.

3.1.1 National Policy

The NPPF sets out the Government's planning polices for England and how these are expected to be applied. Central to the NPPF is the 'presumption in favour of sustainable development' which for plan-making means that local planning authorities should positively seek opportunities to meet development needs and should meet objectively assessed needs unless specific policies of the NPPF (such as Green Belt policy) indicate that development should be restricted.

Protection of Green Belt around urban areas is a core planning principle of the NPPF. Policy for protecting Green Belt land is set out in section 9 of the Framework which emphasises the great importance that the Government attaches to Green Belts.

Circular 42/55 released by Government in 1955 highlighted the importance of checking unrestricted sprawl of built-up areas and of safeguarding countryside from encroachment. It set out three main functions of the Green Belt which are now upheld in the NPPF:

- To check the growth of a large built-up area;
- To prevent neighbouring settlements from merging into one another; and
- To preserve the special character of a town.

The NPPF advocates openness and permanence as essential characteristics of the Green Belt stating that 'the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open' (paragraph 79). The NPPF details five purposes of the Green Belt:

- 1. 'To check the unrestricted sprawl of large built-up areas;
- 2. To prevent neighbouring towns merging into one another;
- 3. To assist in safeguarding the countryside from encroachment;
- 4. To preserve the setting and special character of historic towns; and
- 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. (paragraph 80)

⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁹ http://planningguidance.communities.gov.uk/

For ease of reference in this Review, these purposes are referred to as NPPF Purposes 1 to 5, with the assigned number corresponding to the order in which the purposes appear in the NPPF, as above.

In addition to the purposes of the Green Belt, the NPPF advocates enhancement to existing Green Belts. Paragraph 81 states that 'local planning authorities are required to plan positively to enhance the beneficial use of the Green Belt' once Green Belt boundaries have been defined including looking for opportunities to:

- 'Provide access;
- Provide opportunities for outdoor sport and recreation;
- Retain and enhance landscapes, visual amenity and biodiversity; or
- Improve damaged and derelict land'.

Paragraph 83 states that 'local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans' and that 'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan'. Importantly, the NPPF acknowledges the permanence of Green Belt boundaries and the need for Green Belt boundaries to endure beyond the plan period (paragraph 83). The need to promote sustainable patterns of development when reviewing the Green Belt boundaries is also acknowledged (paragraph 84).

The NPPF seeks to align Green Belt boundary review with sustainable patterns of development (paragraph 84). Local planning authorities are encouraged to 'consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'.

Paragraph 85 states that 'when defining boundaries, local planning authorities should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- *Not include land which it is unnecessary to keep permanently open;*
- Where necessary, identify in their plans areas of "safeguarded land" between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period;
- Make clear that the safeguarded land is not allocated for development at the
 present time. Planning permission for the permanent development of
 safeguarded land should only be granted following a Local Plan review which
 proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.'

3.1.2 National Guidance

The national Planning Practice Guidance is intended to provide up-to-date, accessible and useful guidance on the requirements of the planning system. The Guidance was updated in October 2014, reiterating the importance of the Green Belt and acknowledging that Green Belt may restrain the ability to meet housing need. The following paragraphs are relevant to Green Belt Assessment:

- Paragraph 044 Do housing and economic needs override constraints on the use of land, such as Green Belt? 'The NPPF should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan. The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole, or specific policies in the Framework indicate that development should be restricted' (as it is with land designated as Green Belt). 'The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.'
- Paragraph 045 Do local planning authorities have to meet in full housing needs identified in needs assessments? 'Assessing need is just the first stage in developing a local plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.'

The national Planning Practice Guidance does not provide any specific guidance on conducting a Green Belt Assessment *per se*.

3.1.3 Ministerial Statements

Letters from ministers of the Department for Communities and Local Government (DCLG) to the Planning Inspectorate (PINS) or local government officers or general statements by ministers have clarified or re-affirmed aspects of Green Belt policy. During his time as Planning Minister, Nick Boles issued a series of Ministerial Statements on the Green Belt which, in general, continued to emphasise the protection of the Green Belt.

Perhaps the most significant statement came in March 2014 when correspondence between Nick Boles and PINS reaffirmed the importance and permanence of the Green Belt and that Green Belt may only be altered in 'exceptional circumstances' through the preparation or review of local plans¹⁰. The correspondence recognised

¹⁰ Department for Communities and Local Government (DCLG) (2014) *Inspectors' Reports on Local Plans*.

 $⁽https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/286882/140303_Letter_-Sir_Michael_Pitt.pdf)\\$

the special role of the Green Belt in the framing of the presumption in favour of sustainable development, which sets out that local authorities should meet objectively assessed needs unless specific policies in the Framework indicate development should be restricted with the Green Belt identified as one such policy.

This position was reaffirmed in October 2014 when the national Planning Practice Guidance was amended (see section 3.1.2).

3.1.4 Legal Cases

There is limited case history relating to decisions about the setting or change of Green Belt boundaries in local plans. However, there are two recent relevant examples of note.

The first is the Solihull Local Plan (Solihull Metropolitan District Council). In this case, a developer's sites in Tidbury Green were placed into the Green Belt by the Solihull Local Plan (SLP) adopted in December 2013. The developer challenged the SLP on three grounds: (i) that it was not supported by an objectively assessed figure for housing need; (ii) the Council has failed in its duty to cooperate; and (iii) the Council adopted a plan without regard to the proper test for revising Green Belt boundaries. The Claim succeeded at the High Court.

Solihull appealed against the decision, but the appeal was dismissed by the Court of Appeal. The Court held that the Local Plan Inspector and Solihull Metropolitan District Council had failed to identify a figure for the objective assessment of housing need as a separate and prior exercise, and that was an error of law. In addition, the Judge dismissed the Inspector's reasons for returning the developers' sites to the Green Belt, saying that:

'The fact that a particular site within a council's area happens not to be suitable for housing development cannot be said without more to constitute an exceptional circumstance, justifying an alteration of the Green Belt by the allocation to it of the site in question'.

More recently, in the case of Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council, this position was upheld. In this case, the Parish Council applied to the High Court to quash parts of the Aligned Core Strategies of the three authorities, arguing that: (i) it had failed to consider whether housing numbers should be reduced to prevent the release of Green Belt land; and (ii) it had failed to apply national policy in considering its release. However, the Claim was rejected.

In Paragraph 42 of the decision, referring to the earlier Solihull decision, the Judge stated:

'In the case where the issue is the converse, i.e. subtraction, the fact that Green Belt reasons may continue to exist cannot preclude the existence of countervailing exceptional circumstance – otherwise, it would be close to impossible to revise the boundary. These circumstances, if found to exist, must be logically capable of trumping the purposes of the Green Belt; but whether they should not in any given case must depend on the correct

identification of the circumstances said to be exceptional, and the strength of the Green Belt purposes'.

While supporting the earlier Solihull case, the judgement also confirms that 'exceptional circumstances' may override the purposes set out in the NPPF, depending on the strength of these purposes. In determining what is exceptional, a planning inspector should, after establishing the objectively assessed housing need, ideally consider: the 'acuteness/intensity of the...need'; the 'constraints on the supply/availability of land ... suitable for development'; the 'difficulties in achieving sustainability without impinging on the green belt'; the 'nature and extent of the harm to this green belt'; and how far the impacts on Green Belt purposes could be reduced.

The Judge was satisfied that, whilst 'an ideal approach has not been explicitly followed on a systematic basis', the inspector had 'followed the sort of approach...set out'.

3.2 Local Policy Context

At the local level, there a number of adopted plans that form the basis of the Council's Local Plan. Together these form the local policy context for the Green Belt. The Elmbridge Local Plan consists of the adopted Core Strategy (2011), the Development Management Plan (2015), and Surrey County Council's Minerals Plan Core Strategy and Primary Aggregates Development Plan Documents (2011). In addition the Council has adopted two Supplementary Planning Documents (SPDs) on Design & Character and Developer Contributions.

In October 2014 the Council adopted a new Local Development Scheme (LDS) following a series of decisions made by the Courts and Planning Inspectors in relation to local plans in other areas. These decisions indicated that Plans adopted prior to the publication of the NPPF and where housing delivery was based on Regional Spatial Strategies could not be considered to have an up-to-date housing target. The Council therefore decided to suspend preparation of its Plans to allocate development sites and set out a timetable for the review of the Local Plan's evidence base.

This Green Belt Boundary Review will, alongside a new Strategic Housing Market Assessment; Review of Absolute Constraints; consideration of Exceptional Circumstances; and Site Assessments, form the key evidence base assessing the potential scale of future development within the Borough and will inform the Council's decision on future plan preparation.

3.2.1 Elmbridge Core Strategy (2011)

The Elmbridge Core Strategy states that:

'Evidence shows that there is sufficient potential within the urban area to meet the local housing requirement. The Green Belt boundary will remain unchanged'.

Policy CS1 (Spatial Strategy) specifies the following in relation to the Borough's green infrastructure network:

- 'The multi-functional role of the network will continue to be protected and enhanced and the Council will work with partners to manage and expand sustainable networks of accessible green space and corridors to, and through, the urban area'.
- 'New development will be directed towards previously developed land within the existing built up areas'.

Where new development is considered, the surrounding Green Belt will continue to be protected and full account must be taken of the impact of such development on the Green Belt.

Policy CS14 (Green Infrastructure) states that the Council will protect, enhance and manage a diverse network of accessible multi-functional green infrastructure, pursuing new provision and improvements to existing facilities in order to increase their capacity, including in the Green Belt.

3.2.2 Development Management Plan (2015)

Policy DM1 sets out the Council's overarching approach in favour of sustainable development. However, the policy also notes:

'Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

i. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or

ii. Specific policies in the Framework [such as Green Belt policy] indicate that development should be restricted.'

Policy DM17 upholds the fundamental aims of the Green Belt in preventing urban sprawl and safeguarding the openness of the Green Belt, limiting the development of new building in the Green Belt to a few exceptions.

Policy DM18 establishes a presumption in favour of extensions, and alterations to and replacements of, buildings in the Green Belt, provided they do not result in disproportionate additions over and above the size of the original building or have a materially greater impact on the openness of Green Belt.

3.3 Other Context

3.3.1 Planning Advisory Service Guidance (2015)

The Planning Advisory Service (PAS) published updated guidance for Green Belt Assessment in February 2015 in the context of the need to accommodate strategic housing (and employment) requirements¹¹.

Emphasis is placed on the need for assessment against the five purposes of the Green Belt in the first instance. The guidance acknowledges that there are planning considerations, such as landscape quality, which cannot be a reason to designate an area as Green Belt, but that could be a planning consideration when seeking suitable locations for development.

The guidance outlines considerations to be made in relation to the five purposes as set out below:

- Purpose 1: to check the unrestricted sprawl of large built up areas consider the meaning of sprawl compared to 1930s definition, and whether positively planned development through a local plan with good masterplanning would be defined as sprawl.
- Purpose 2: to prevent neighbouring towns from merging into one another the purpose does not strictly suggest maintaining the separation of small settlements near to towns. The approach will be different for each case. The identity of a settlement would not be determined solely by the distance to another settlement; the character of the place and of the land in between must be taken into account. A 'scale rule' approach should be avoided. Landscape character assessment is a useful analytical tool for this type of assessment.
- Purpose 3: to assist in safeguarding the countryside from encroachment Seemingly, all Green Belt achieves this purpose. The recommended approach is to look at the difference between land under the influence of the urban area and open countryside, and to favour open countryside when determining the land that should be attempted to be kept open, accounting for edges and boundaries.
- Purpose 4: to preserve the setting and special character of historic towns

 it is accepted that in practice this purpose relates to very few settlements as a result of the envelopment of historic town centres by development.
- Purpose 5: to assist in urban regeneration by encouraging the recycling of derelict and other urban land the amount of potentially developable land within urban areas must have already been factored in before Green Belt land is identified. All Green Belt would achieve this purpose to the same extent, if it does achieve the purpose, and the value of land parcels is unlikely to be distinguishable on the basis of this purpose.

The PAS guidance additionally recognises the relevance of the duty to cooperate, as set out in the Localism Act 2011, and soundness tests of the NPPF to Green Belt consideration. The NPPF requires local planning authorities to 'work

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¹¹ Planning Advisory Service (2015) Planning on the Doorstep: The Big Issues – Green Belt.

collaboratively with other bodies to ensure strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans' (paragraph 179). Additionally the level of housing that a local authority is required to plan for is also determined by whether there is an 'unmet requirement' from a neighbouring authority (paragraph 182).

The guidance recognises that Green Belt is a strategic policy and hence a strategic issue in terms of the duty to cooperate. Areas of Green Belt should therefore be assessed collectively by local authorities. This is important particularly for areas of Green Belt land that fall into different administrative areas, and the significance attached to that land.

3.4 Green Belt Experience

3.4.1 Neighbouring and Surrey Authorities' Experience

Local planning authorities now hold the responsibility for strategic planning following the revocation of regional strategies as created in the Localism Act 2011. The national Planning Practice Guidance outlines the duty to cooperate as:

"...a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an on-going basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters."

This Review covers the areas of the Green Belt falling within the administrative boundary of Elmbridge Borough Council, as well as areas in neighbouring authorities where there is no defensible boundary feature which aligns with the Borough boundary. However, it is important to note that this assessment will not directly influence the approaches to Green Belt in neighbouring authorities and no recommendations will ultimately be made beyond the boundaries of Elmbridge.

The methodology and proposed Green Belt parcels were shared with the neighbouring and wider partner authorities and discussed at a workshop held on 19th May 2015. Comments received have been taken into account in developing the methodology and undertaking the Review. The draft Local Area Assessments were also shared with relevant local authorities where they crossed the administrative boundary of Elmbridge into other boroughs and districts. The comments received were considered and have fed into this report where appropriate.

As part of this Review, it is important to understand how each of the neighbouring local authorities, as well as other authorities in Surrey, are approaching Green Belt issues and the methodology employed in any reviews of the Green Belt they have undertaken. Green Belt in adjoining districts (Map 3.1) may achieve the purpose of checking unrestricted sprawl from the urban areas both within and outside Elmbridge. It may also play a role in protecting strategic gaps between urban areas and settlements both within and outside Elmbridge. The potential release of any Green Belt land within or outside Elmbridge may impact on settlement patterns and the role of the wider Metropolitan Green Belt.

Furthermore, in November 2014 Elmbridge Borough Council, along with nine other Surrey boroughs and districts and Surrey County Council, agreed to the preparation of a Surrey Local Strategic Statement (LSS) which will set out common priorities on strategic matters which can be used in Local Plans and associated examinations¹². This included an undertaking to develop a picture of housing need across Surrey (an NPPF-compliant Strategic Housing Market Assessment for each borough and district) and an up-to-date picture of Green Belt to inform local plans and the LSS. Close liaison with other Surrey authorities will therefore be important to developing a consistent approach to Green Belt across the LSS area, and understanding the role of the Green Belt and the possible impacts of release at a strategic level.

The approaches to Green Belt Boundary Reviews taken in neighbouring and other Surrey authorities have been summarised below based on a review of material available on the authorities' websites; for neighbouring authorities, additional detailed summaries of approaches to Green Belt are provided (Table 3.1). This table was shared with the authorities concerned for validation, verification of accuracy and to check the degree to which it matched current thinking within said authorities.

In summary:

- Neighbouring authorities' Green Belt Reviews identified land parcels of strategic importance in reference to both the NPPF Green Belt policy and local Green Belt planning policy.
- For Runnymede Borough Council, the parcels were divided based on visible natural features and infrastructure. Potential constraints were then considered and parcels were recommended for release based on whether they met both NPPF criteria and the existing settlement hierarchy.
- Woking Borough Council implemented a sieve to exclude areas of land with constraints. The availability and achievability of sites were also considered.
 The remaining sites were then assessed in terms of suitable development uses.
- Guildford Borough Council's review sub-divided land into parcels based on viable features. These parcels were assessed for their contribution to the four main Green Belt purposes. The study consists of a number of volumes which, using environmental capacity and sustainability analysis, identified a range of potential development areas based on different spatial strategies. This includes strategic sites around the urban areas, small and major expansion around the villages and a new settlement. The study also looked at the insetting of villages, major previously developed sites and traveller sites.
- Mole Valley District Council's review grouped parcels into broad areas of the Green Belt with similar characteristics. Each area was then graded on its significance to the Green Belt (minimal, moderate or significant).

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¹² The authorities signed up to the preparation of the Surrey LSS are: Elmbridge Borough Council; Epsom and Ewell Borough Council; Guildford Borough Council; Mole Valley District Council; Reigate and Banstead Borough Council; Runnymede Borough Council; Spelthorne Borough Council; Surrey County Council; Tandridge District Council; Woking Borough Council.

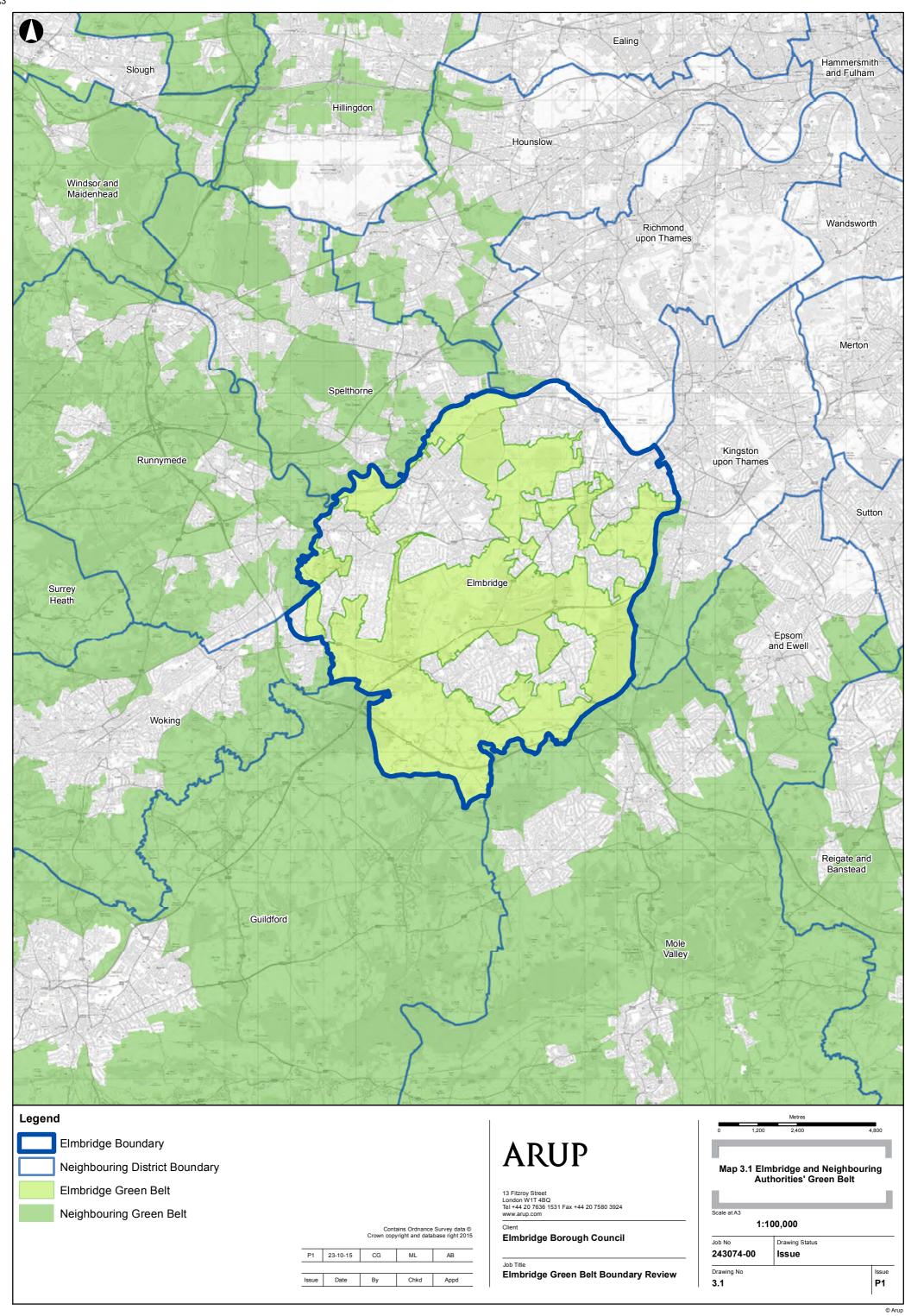


Table 3.1 Green Belt Approaches in Neighbouring Authorities

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
Spelthorne Borough Council	The Council's current Core Strategy was adopted in February 2009. Following the publication of the NPPF the Council made the decision to review existing planning documents in September 2014 and produce a new Local Plan. The Council is currently undertaking early stakeholder engagement which will run through to January 2016.	Land outside the Borough's urban area covers about 65% of the total area and is part of the Metropolitan Green Belt with a "strategic role in containing the outward spread of the capital and providing a belt of open land for air and exercise" (2009 Core Strategy). The Vision calls for all further development to be confined within existing urban areas.	N/A	N/A
Runnymede Borough Council	The Council's Local Plan was adopted in 2001. A new Local Plan is in preparation with policies guiding development in Runnymede up to 2035. Officers are currently compiling an evidence base	Approximately 79% of Runnymede is designated Green Belt. The Local Plan Saved Policies state that with some limited exceptions, there will be a "strong presumption against development" within the Green Belt, or that would conflict with its purposes or adversely affect its open character. The Council previously submitted a Local Plan Core Strategy (LPCS) for examination in January 2014. The intention was that the LPCS would form one of a suite of documents to replace the saved policies from the 2001 Local Plan. Following a preliminary hearing in April 2014, the Planning Inspector recommended that the Council should withdraw the LPCS, questioning the lack of up to date evidence and a need to fulfil duty to cooperate in a more collaborative and robust way, in particular to consider	Runnymede Borough Council Green Belt Review 2014	Phase 1 involved the identification of parcels based on the following features: 1. M3 and M25 motorways; 2. A and B roads; 3. Railway lines; 4. River Thames; 5. River Wey. These parcels were initially scored against the NPPF purposes of the Green Belt with a score of 1 to 5. Phase 2 involved assessing the parcels against technical constraints and then re-appraising the refined parcels against the 5 NPPF purposes. Conclusions were then drawn regarding which resulting land parcels could potentially be released based on whether they met the NPPF purposes and their strategic fit within the existing settlement hierarchy,

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
		meeting the shortfall within an appropriately defined housing market area. The Inspector in his recommendation stated that a Green Belt review and an updated Strategic Housing Market Assessment (SHMA) together with any other existing evidence "will enable the Council to produce an up-to-date plan for the Borough, within a relatively short timescale, based on robust and justified information".		
Woking Borough Council	Woking's Core Strategy was adopted on 25 October 2012.	60% of the Borough's land outside of a large built-up area of villages. Large areas of heathland within the Metropolitan Green Belt are designated as part of the Thames Basin Heaths Special Protection Area (SPA). The spatial vision calls for the protection of "the integrity of the Green Belt" (2012 Core Strategy). Limited infilling and redevelopment will be allowed in designated Major Developed Sites within the Green Belt to accommodate housing need in the Borough between 2022 and 2027.	Woking Green Belt Review 2013	Stage 1 involved sieve mapping which identified areas of land which should be excluded from further study due to the presence of constraints. Stage 2 involved the identification of land parcels based on constraints in Stage 1, broad landscape characteristics and identifiable features. Separate criteria (major importance; moderate importance; minor importance and no importance) were used to assess parcels of land against each of the Green Belt purposes for Stage 3. Sites were then identified against overall potential including availability and achievability. Stage 5 involved a review of Gypsy and Traveller sites within the Green Belt and Stage 6 considered options for development in suitable sites. The study determined that in most areas, designated Green Belt land around the town serves some or all of the Green Belt purposes.

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
Guildford Borough Council	The current Local Plan for Guildford was adopted in 2003. Consultation on a new draft Local Plan ran from July to September 2014. The Council is in the process of updating the Local Development Scheme.	The borough is 89% Green Belt, the remaining consisting the urban areas of Guildford, Ash and Tongham with a small proportion of Countryside beyond the Green Belt in the west. The 2003 Local Plan included the removal of Manor Farm at the University of Surrey from the Green Belt.	Guildford Borough Greenbelt and Countryside Study 2013 (Volume I, Volume II, Volume II addendum, Volume III, Volume IV, Volume V, Volume VI)	Stage 1 involved the compartmentalisation and sub-division of land into separate land parcels with boundaries of each parcel being clearly demarcated by visible landscape features. Stage 2 involved a score of zero or one against each of the following four Green Belt purposes as set out in the NPPF: 1. Safeguarding the countryside from encroachment. 2. Prevent towns merging. 3. Restrict sprawl of urban areas. 4. Preserve setting and character of historic towns. Stage 3 involved assessing the environmental capacity of land surrounding the urban areas and villages to determine whether it may be appropriate to identify a potential development area. Stage 4 involved assessing the sustainability credentials of potential development areas identified within Stage 3. The Study also assessed whether a new settlement at Wisley airfield might be appropriate in Green Belt terms, and whether it would be appropriate to inset some villages, major previously developed sites and Traveller sites. The study findings recommended a range of potential development areas that will be considered further through the Local Plan process.
Mole Valley District Council	The 2009 Mole Valley Core Strategy guides new development in the District up to 2026.	75% of the District is within the Metropolitan Green Belt with most of the existing development in the District within	Green Belt Boundary Review 2013	The Green Belt within Mole Valley has been reviewed against the following criteria:

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
		the five built up areas and five larger rural villages. The Core Strategy calls for new development to be directed to suitable areas within existing built-up areas.		 To what degree does this land prevent neighbouring towns/villages merging into one another? To what degree does this land assist in safeguarding the countryside from encroachment? To what degree does this land preserve the setting and special character of historic towns and villages? Parcels were grouped into broad areas of Green Belt with similar characteristics were identified and analysed against the above criteria – each area was then given a grading according to whether it has a minimal, moderate or significant contribution to the purposes of the Green Belt.
Royal Borough of Kingston upon Thames	The Core Strategy development plan document was adopted in April 2012 and guides future development in the borough up to 2027.	640 hectares of land in the south of the borough is designated Green Belt, just over 15% of its total area. The Core Strategy DPD states that the Green Belt forms part of London's strategic open space network, and will continue to be protected from inappropriate development and maintain a clear urban edge to this part of south west London.	N/A	N/A
London Borough of Richmond Upon Thames	In July 2015 the Council agreed a new Local Plan programme for progressing the Site Allocations Plan and the initial scope for the partial review of the existing Core Strategy (2009) and Development Management Plan (2011). The Council is now in the process of reviewing and updating the Local	The adopted Core Strategy (2009) states that as the Council can achieve its strategic dwelling target and other land use needs without the loss of protected open land. It is not envisaged that significant changes will be brought forward through the site allocations DPD, and there may be scope for including some additional areas for further protection.	N/A	N/A

Authority	Local Plan Status	Green Belt Context	Green Belt Assessment	Methodology / Conclusions from Green Belt Assessment
	Plan, consisting of the adopted Core			
	Strategy (CS) (2009) and			
	Development Management Plan			
	(DMP) (2011). It is now proposed to			
	take the site-specific allocations			
	forward alongside the review of the			
	existing policies to allow the Council			
	to align the sites available with the			
	needs of the borough as identified			
	through the Local Plan Review. A			
	consultation on the rationale and			
	scope for the review of the policies			
	contained within the CS and DMP,			
	including the proposed sites to be			
	allocated for development, is taking			
	place in January/February 2016.			
	Pre-publication consultation on the			
	first draft of the Local Plan is			
	anticipated to take place in late spring			
	/ early summer 2016, with			
	publication in late autumn 2016 and			
	submission for examination in spring			
	/ summer 2017, whereby the adoption			
	of the Local Plan is anticipated to			
	take place in spring 2018. It is not			
	envisaged that a review of Green Belt			
	boundaries will be undertaken as part			
1	of the Local Plan process.			

3.4.2 Wider Experience

A brief examination of a selection of Green Belt Boundary Reviews carried out elsewhere in the country revealed the following key lessons in terms of methodology as follows.

- A variety of approaches have been taken in assessing the functionality of Green Belt against the NPPF purposes. This partially reflects that each study has been undertaken in response to a specific brief and is tailored to the special local characteristics of the area in question.
- A two stage process has typically been used to first identify those Green Belt
 areas least sensitive to change and where development would be least
 damaging in principle, before moving onto a second stage to consider
 technical site constraints.
- For the purposes of assessment, authorities have primarily divided the Green Belt into land parcels for assessment using durable, significant and strong physical boundaries which are clearly defined in the methodology, though some have used grid squares of a defined size to identify the land parcels for assessment.
- Only those purposes deemed relevant to the local context have been used in reviews rather than necessarily using all five, while in some instances authorities have combined multiple purposes within their assessments.
- In terms of interpreting the national purposes, definition of terms (both within the purposes themselves and criteria applied) is of key importance to a successful and transparent assessment.
- Assessment criteria used to assess individual purposes have been tailored to local circumstances.
- Qualitative approaches are primarily used in assessments, although some authorities have used more quantitative measures. The approach to scoring in assessments varies from simplistic traffic light systems to more complex approaches to scoring.

3.5 Implications for the Review

National policy, as set out in the NPPF, emphasises the importance and permanence of Green Belt. The NPPF sets out clearly the five purposes that the Green Belt is intended to serve, highlights that the Local Plan process offers the only opportunity for the Green Belt boundaries to be reviewed, and stresses that boundaries should be defined using permanent and recognisable physical features. Neither the NPPF, nor the supporting national Planning Practice Guidance, provide guidance on how to conduct a Green Belt Review *per se*. The implied emphasis is thus on each authority to develop a methodology which is appropriate to the local context.

Crucial to the development of such a methodology is the establishment of satisfactory definitions for the key terms used in the NPPF purposes (yet not

explicitly defined) – different interpretations of such terms would significantly alter how the Review is carried out. While a number of Green Belt Boundary Reviews do not articulate clearly how terms have been defined, the Green Belt Boundary Review for Dacorum, St Albans and Welwyn Hatfield provided definitions based on a combination of legitimate sources (for example, the Oxford English Dictionary) as well as the known aspirations sought through national and local policy.

Some key definitions which were considered for this Review include:

- Large built-up areas (Purpose 1): This originally referred to London for the Metropolitan Green Belt, but the scope of how this is interpreted has shifted over time to include other large settlements within the wider Green Belt area. The Dacorum, St Albans and Welwyn Hatfield review applied the term to London, Luton/Dunstable and Stevenage, though it is not immediately clear how this choice was reached. The Central Bedfordshire Green Belt Assessment applied the definition more broadly, considering any area deemed 'urban'. When defining this term, the methodology for Elmbridge considered the settlement structure across the Borough, which consists of a series of small-medium sized towns as well as built-up areas immediately adjacent to London.
- Sprawl (Purpose 1): The definition of this term varies significantly. The PAS Guidance queries whether development that is masterplanned and promoted positively through a development plan would constitute sprawl, but this does not provide a specific and measurable definition which could be applied in a Green Belt Boundary Review, nor does it feel like an entirely satisfactory explanation of sprawl alone. Other Green Belt Reviews, for example the Guildford Green Belt and Countryside Study, have edged towards a more spatial definition, considering sprawl as the 'creeping advancement of development beyond a clear physical boundary of a settlement'. Given sprawl is a multi-faceted concept, it would seem prudent to consider both of these spheres in the definition adopted in this Review.
- Neighbouring towns (Purpose 2): The interpretation of 'towns' varies across previous Green Belt Boundary Reviews. While it tends to be aligned to the defined settlement hierarchy, as set out in the relevant development plan, some authorities have chosen to apply a more local purpose. For example, in Runnymede, the threat of coalescence between many smaller settlements led to the Green Belt Boundary Review considering all settlements equally, including those 'washed over' in the Green Belt. Given that, in Elmbridge, the Green Belt boundaries are for the most part closely abutting the edge of settlements, it might be most appropriate to consider all non-Green Belt areas as the 'towns' to be considered in the assessment.
- Countryside (Purpose 3): The Dacorum, St Albans and Welwyn Hatfield Review adopted a 'functional' as opposed to 'political economy' definition of this term, centred on pastoral and primary land uses, while others adopted broader definitions which took countryside to mean any open land. Evidently, this interpretation is not appropriate in areas which are entirely semi-urban, where Green Belt may have been applied to areas which are open but not genuinely of a 'countryside' character. Given the significant contrast between

urban and rural areas in and around Surrey, in a similar fashion to areas of Buckinghamshire or Hertfordshire, a similar 'functional' definition may be the most appropriate.

In addition to other Green Belt Boundary Reviews, the PAS Guidance on Green Belt Assessments issued in 2014 is particularly helpful in setting out key parameters to consider when developing a Green Belt Assessment methodology. The key points to note are:

- A Green Belt Assessment is not an assessment of landscape quality, though elements of landscape assessment assist in assessing the Green Belt (for example, in identifying potential new boundaries or differentiating between areas of unspoilt countryside or semi-rural areas).
- The label 'historic towns' applies to a select number of settlements and it is therefore accepted that the Purpose 4 assessment will only be relevant in very few instances. As set out in section 4.4.4, it is considered that Purpose 4 is not relevant to the Elmbridge Green Belt Boundary Review.
- Purpose 5 is not helpful in terms of assessing relative value of land parcels and is therefore not relevant to the Elmbridge Green Belt Boundary Review.
- Green Belt is a strategic issue and should be considered collaboratively with neighbouring authorities under duty to cooperate, thus emphasising the importance of ongoing consultation with neighbouring stakeholders.

4 Methodology

4.1 Introduction

The following sections set out the methodology used for undertaking the Green Belt Boundary Review. An overview of the methodology is set out in. Figure 4.1

4.2 Parcel Identification

The scope for this Review was to consider all Green Belt land, as defined in the current adopted local plan for Elmbridge (Map 4.1), as well as non-Green Belt land that might be considered for inclusion in the Green Belt. As required by the brief, two tiers of Green Belt land parcel were identified:

- Strategic Green Belt Areas (Strategic Areas) Broad areas for the Strategic Green Belt Area Assessment, identified largely through commonalities in landscape character and natural constraints or barriers that distinguish between different parts of the Green Belt, and functional connections with the wider Metropolitan Green Belt. Further details on the identification of the Strategic Areas is provided in section 4.2.1.
- Local Green Belt Areas (Local Areas) More granular parcels for the Local Green Belt Area Assessment against the NPPF purposes. Further details on the identification of the Local Areas is provided in section 4.2.2.

While the assessment process initially considered these two assessment levels discreetly, outputs from analysis of the Strategic Areas has informed the detailed recommendations for the smaller Local Areas.

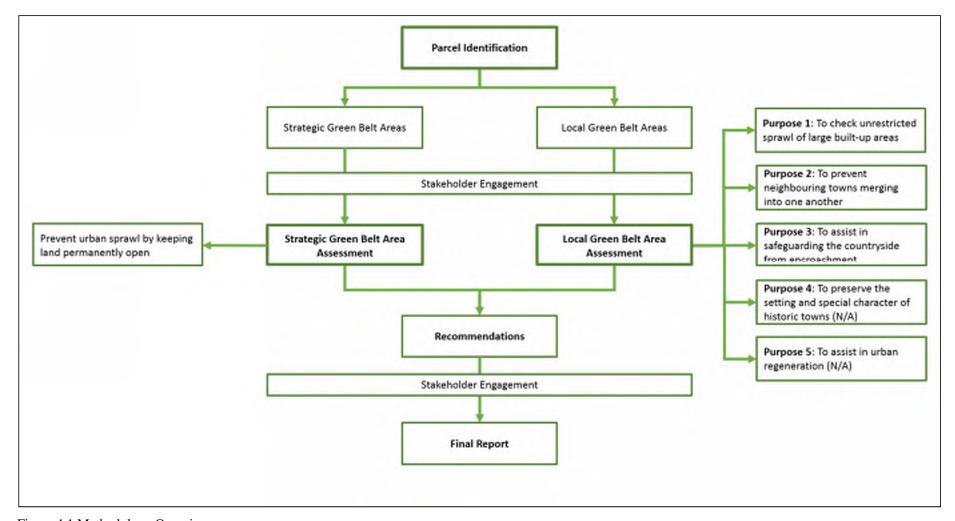
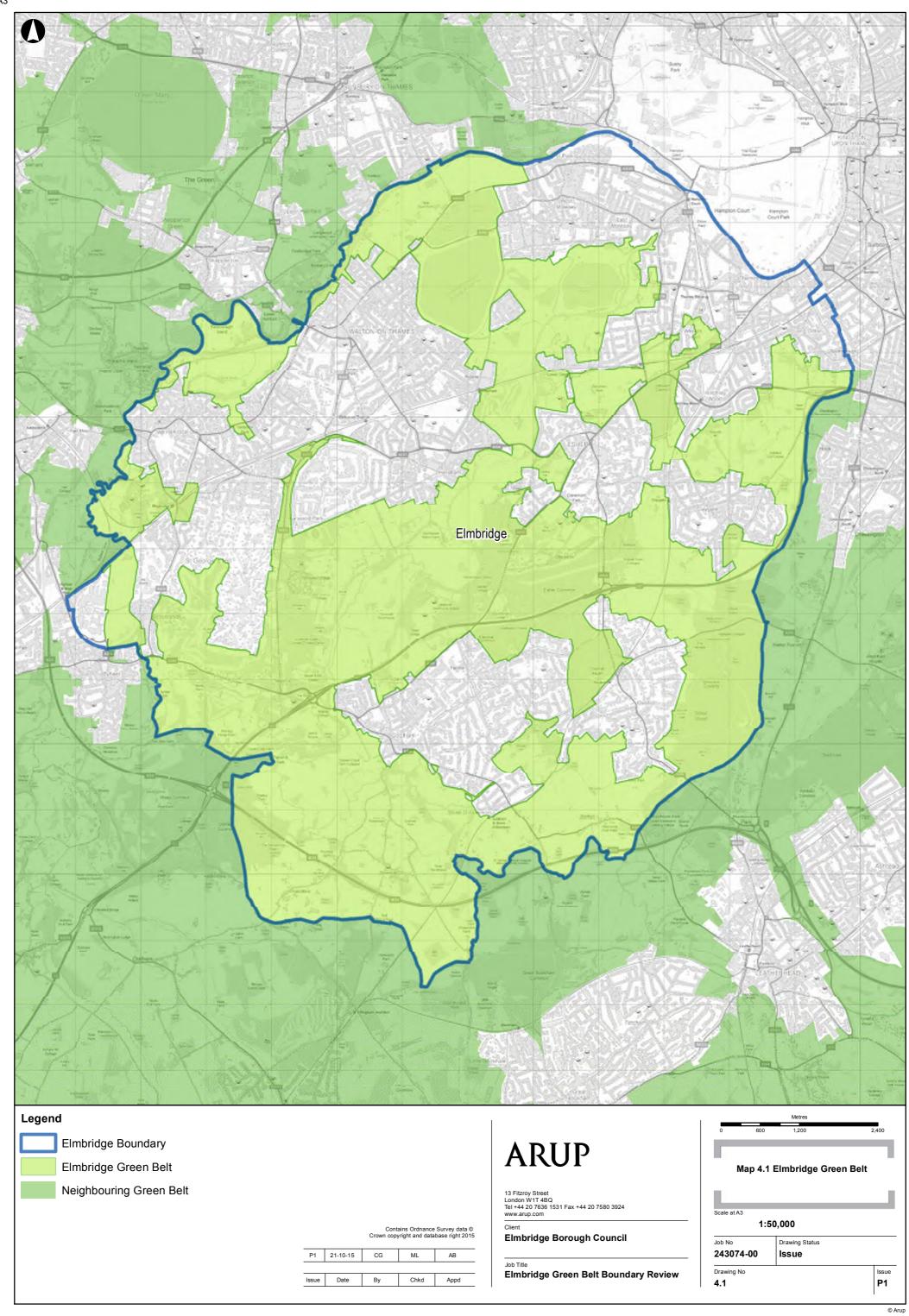


Figure 4.1 Methodology Overview

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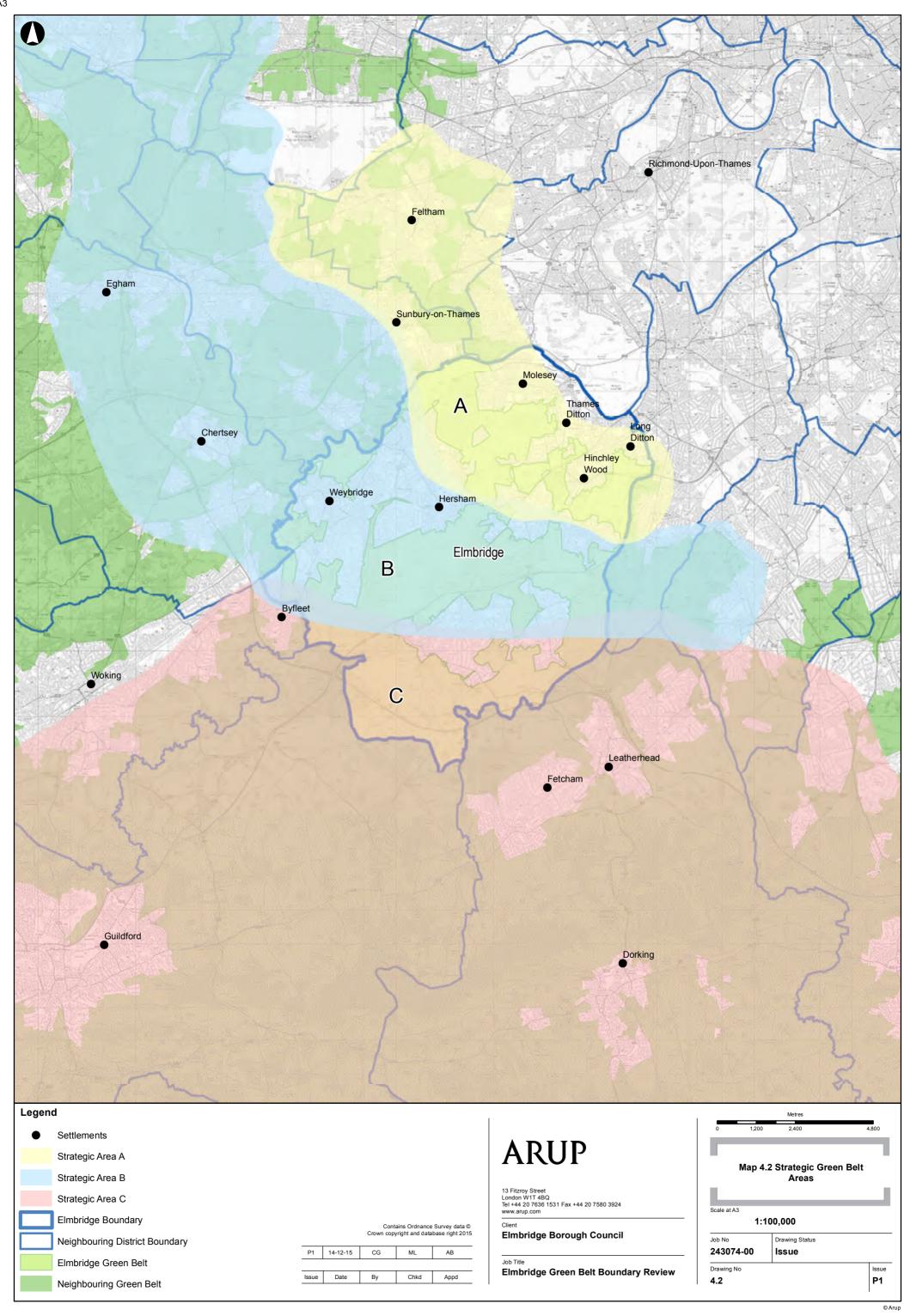
4.2.1 Strategic Green Belt Areas (Strategic Areas)

Green Belt designation extends over 57% of the Borough, though the Council notes that it is of a particularly fragmented nature, reflecting the transition between the Surrey countryside and London to the north-east¹³.

Three broad Strategic Green Belt Areas were identified as shown in Map 4.2, based on initial discussions with the Council, desk-based analysis, and the emerging/draft Surrey Landscape Character Assessment Study. The identified Strategic Green Belt Areas are summarised as follows, with detailed analysis contained in Annex Report 1:

- Strategic Area A A northern band of Green Belt separating the London fringe settlements (e.g. Molesey, Thames Ditton, Long Ditton, and Hinchley Wood) from settlements to the south. This Strategic Area of Green Belt is fragmented in nature, often reduced into small pockets of green space utilised for functional/infrastructure and recreational uses. Incorporating the northern reaches of the Thames River and Lower Mole River Floodplains, the Strategic Area is degraded in places and includes a series of large elevated reservoirs extending north-westwards into Spelthorne and other industrial uses such as water treatment works at Walton and Esher, and the Sunbury Lock gas works. The area also includes green space within urban areas such as Sandown Park Racecourse, golf courses, and sports pitches. Tranquillity tends to be lower than in the other Strategic Areas.
- Strategic Area B A central band of Green Belt separating the settlements of Walton-on-Thames / Weybridge / Hersham, Esher and Claygate from the settlements of Cobham and Oxshott to the south. This Strategic Area of Green Belt is less fragmented than Strategic Area A, albeit with a range of uses and characteristics. The west of the Strategic Area (extending into Runnymede, Spelthorne and into the outer-most fringes of London around Hillingdon) is characterised by rolling farmland landscape with varying field sizes, levels of openness (including areas of significant tree cover) and degree of human influence (for example, golf courses). To the east of the Lower Mole River Floodplain (characterised by a mixture of pastoral and arable fields), the Strategic Area becomes more influenced by urban settlement, with a series of wooded commons, public car parks, and roads. The eastern side of the Strategic Area, extending into Kingston upon Thames and Epsom and Ewell, is characterised by arable farming and ancient woodland.
- Strategic Area C A southern band of Green Belt located to the south of Esher and Claygate and the southern extent of Cobham and Oxshott, connecting directly with the more rural character of the Green Belt found in Guildford and Mole Valley. The character of this Strategic Area is dominated by gently sloping lowland containing medium to large fields of pasture with some arable farming, ancient woodland, and historic parks. The area is dissected by major transport routes including the A3 and M25. Settlements are smaller and more dispersed.

¹³ Elmbridge Borough Council (2011) Elmbridge Core Strategy.



4.2.2 Local Green Belt Areas (Local Areas)

Any potential alterations to the Green Belt must be based on a new permanent and defensible boundary; thus, permanent man-made and natural features have been selected as the basis of criteria for the identification of the Local Areas. In particular, the boundaries of the Local Areas are based on the following features (Map 4.3):

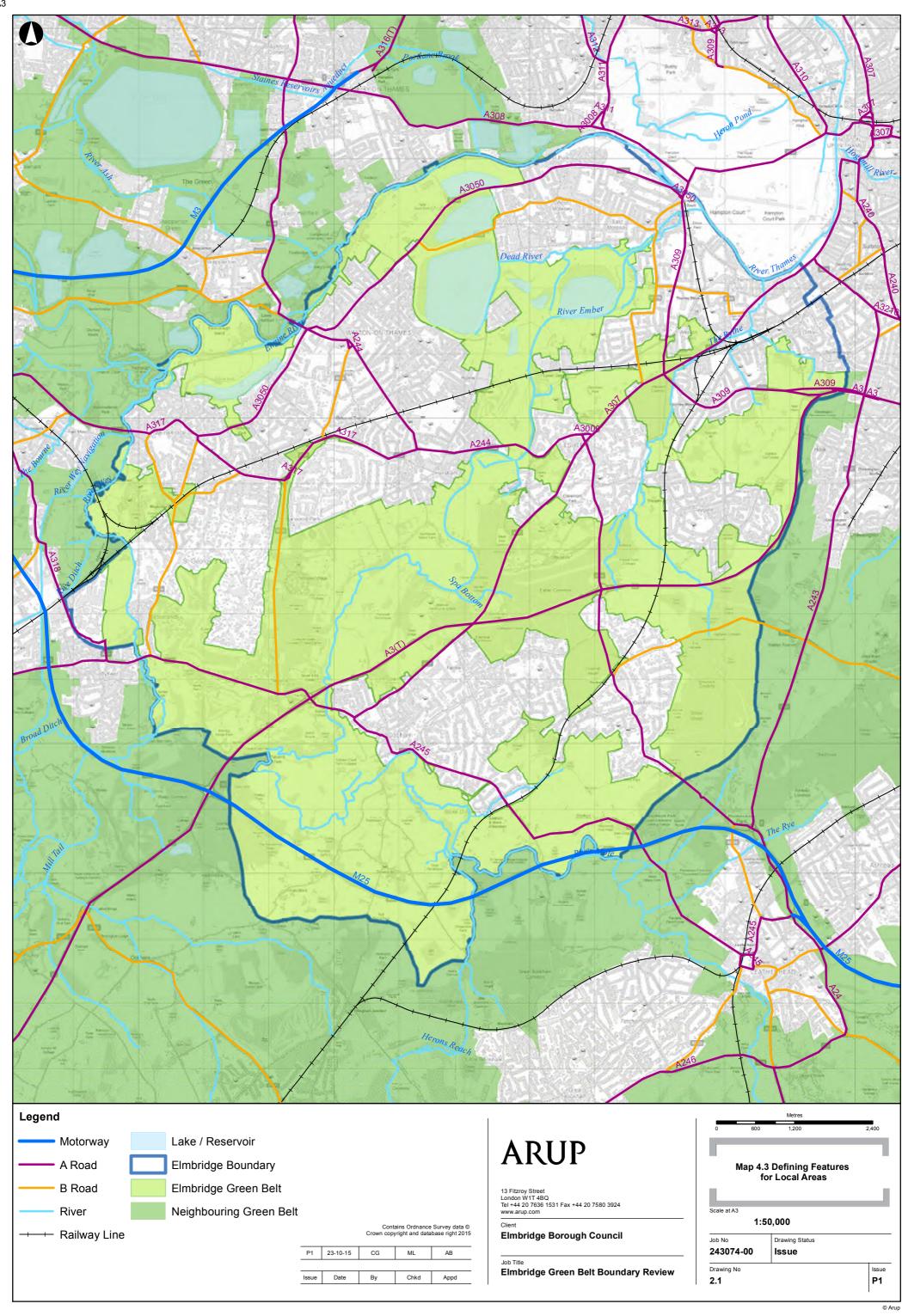
- Motorways;
- A and B Roads;
- Railway lines;
- River Thames:
- Role Mole;
- River Wey Navigation; and
- Reservoirs.

Given the range of urban and rural conditions found in Elmbridge, from the semiurban fringes of Greater London (e.g. Molesey and Long Ditton) in the north of the Borough to the relatively unspoilt countryside in the south, a flexible approach to the identification of Local Areas for assessment was deemed necessary, particularly in the environs of the non-Green Belt settlements. This was achieved through careful consideration of Local Area parcel boundaries during site visits and the sub-division of some Local Areas in and around the non-Green Belt settlements where appropriate using additional durable boundary features such as:

- Unclassified public roads and private roads;
- Smaller water features, including streams, canals and other watercourses;
- Prominent physical features (e.g. ridgelines);
- Existing development with strongly established, regular or consistent boundaries;
- Protected woodland or hedgerows.

This process of sub-division took into account local context and involved an element of professional judgement based on site visits and discussions with Council officers.

In some cases, boundary features are located close together, for example where roads, rivers, and/or railway lines run closely parallel to each other. These features were taken together to form one boundary rather than separately which would lead to small slithers of Green Belt land which would not form logical Local Areas for assessment.



It was decided that, in cases where the Elmbridge Borough boundaries do not coincide with permanent, durable boundary features, Local Areas would overlap with Green Belt in neighbouring authority areas to align with the nearest durable feature. This ensures a consistent approach to the assessment of Green Belt throughout Elmbridge and takes into account the strategic, cross-boundary nature of the Metropolitan Green Belt. In cases where Green Belt at the edge of the Borough was not deemed to meet Green Belt purposes, this may have implications for its designation, not just within Elmbridge but also outside the Borough. However, it is important to note that this assessment does not directly influence the approaches to Green Belt in neighbouring authorities and no recommendations have ultimately been made beyond the boundaries of Elmbridge.

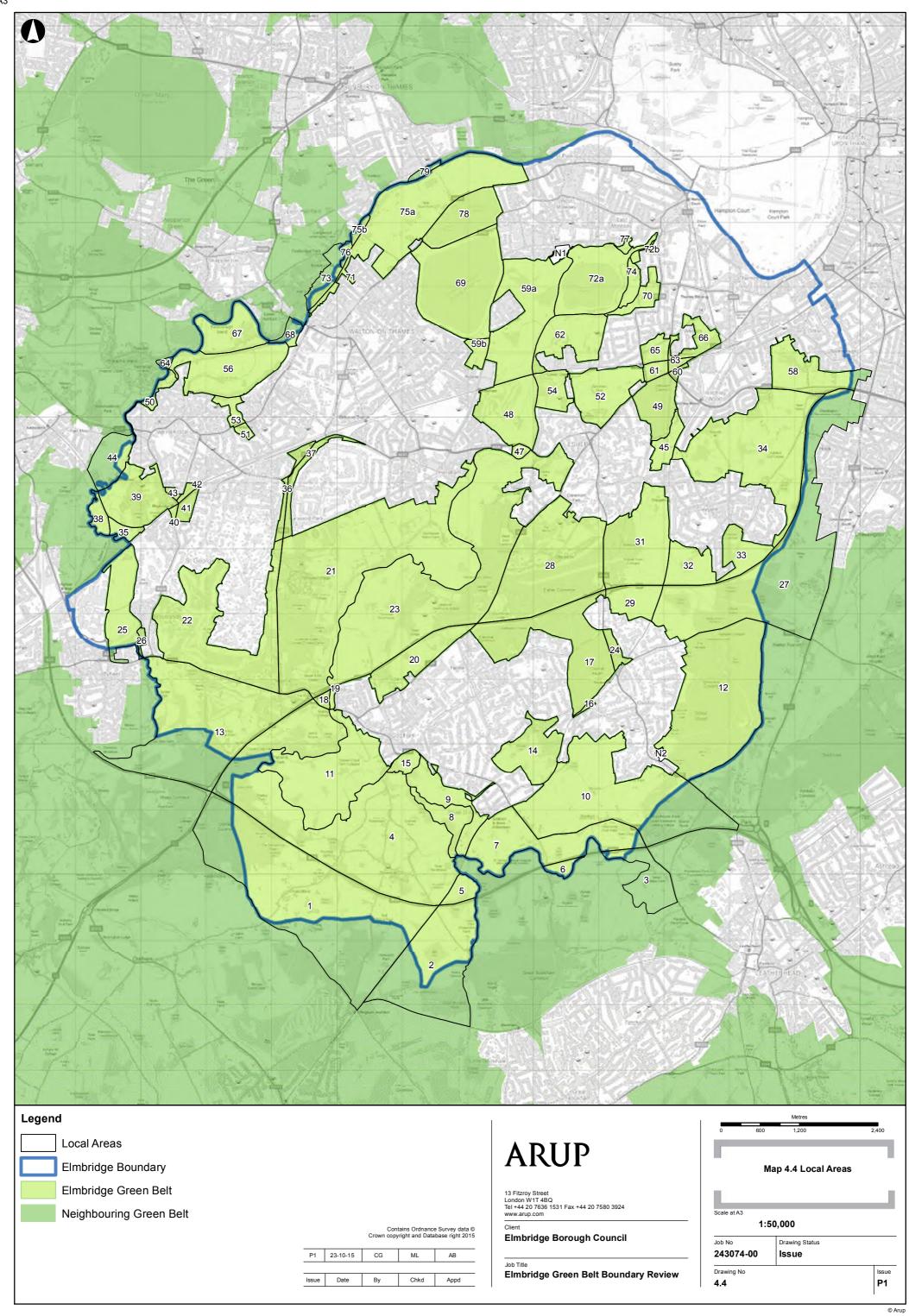
Non-Green Belt

Based on previous experience of conducting Green Belt Boundary Reviews, the starting point for identifying non-Green Belt land was open land outside of the defined settlement limits set out in local development plans but not included in the Green Belt. Liaison with Elmbridge Borough Council found that two remaining reserved housing sites on the edge of urban areas were consistent with this criteria and should be assessed against the Green Belt purposes.

In general, following discussion with the Council, it was concluded that existing Green Belt boundaries are drawn sufficiently tightly to the built environment to negate any significant additional investigation within existing settlement limits. Therefore, the only non-Green Belt land considered in this Review are the two identified reserve housing sites located on the south-east side of Oxshott and the south side of West Molesey.

Identified Local Areas

A total of 78 Local Areas and two Non-Green Belt Areas were identified for assessment (see Map 4.4). It should be noted that the numbering of the Local Areas is not strictly sequential due to adjustments to the parcels during identification (e.g. further sub-division and combining of parcels as deemed appropriate). The two non-Green Belt parcels (identified reserve housing sites) are labelled N1 and N2 respectively.



4.3 Strategic Green Belt Area Assessment

The Strategic Green Belt Area Assessment focussed on two aspects of the Elmbridge Green Belt:

- The role of Elmbridge Green Belt within the wider sub-regional context of the Metropolitan Green Belt; and
- The different functional areas of Green Belt within the Borough (as identified in section 4.2.1).

This task provided a critical context-setting role in the Green Belt Boundary Review, identifying the functional role of Elmbridge's Green Belt in relation to the rest of the Surrey Green Belt and wider Metropolitan Green Belt.

Within Elmbridge, the Core Strategy identifies the 'myriad of distinctive and diverse landscapes' within the Green Belt (paragraph 3.14). Having identified broad strategic areas for high-level consideration, a desk-based assessment was undertaken to identify the different functional roles of the Green Belt across the Borough, including physical constraints or barriers that distinguish between the different areas, and how these link to the wider Green Belt within neighbouring authorities. These Strategic Green Belt Areas subsequently provide the context for the Local Green Belt Assessment.

4.4 Local Green Belt Area Assessment

Each of the Local Areas identified in section 4.2.2 was assessed against the NPPF Purpose 1-3¹⁴. There is no national guidance, which establishes exactly how such an assessment should be undertaken. The PAS guidance, recent examples and previous experience reiterate the need to respect local circumstances and the unique characteristics that affect the way that the NPPF purposes of the Green Belt are appraised.

The purpose of the assessment was to establish any differentiation in terms of how the Local Areas in the existing Green Belt function and fulfil the purposes of the Green Belt. For those Local Areas outside of the current Green Belt, the assessment considered how these land parcels might fulfil the purpose if designated.

For each purpose, one or more criteria were developed using both qualitative and quantitative measures. A score out of five was attributed for each criterion (Figure 4.2). If a Local Area was considered to have no contribution to a specific purpose, in addition to the detailed analysis undertaken, a statement was added to the proforma to this effect and a score of zero was attributed.

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¹⁴ As set out in sections 3.5, 4.4.4, and 4.4.5, NPPF Purposes 4 and 5 were not considered relevant for this Review.

Figure 4.2 Indicative Criteria Scores and Equivalent Wording for individual purpose assessments

Strength of Local Area against	Score	Equivalent Wording
criteria for Purposes 1-3	1	Weak or Very Weak
	2	Relatively Weak
	3	Moderate
	4	Relatively Strong
	5	Strong or Very Strong

It is important to note that each of the NPPF purposes is considered equally significant, thus no weighting or aggregation of scores across the purposes was undertaken. As such, a composite judgement was necessary to determine whether, overall, Local Areas are meeting Green Belt purposes strongly or weakly for each purpose.

Following the individual purpose assessments, an overall summary was developed for each Local Area. A rule of thumb was applied whereby:

- Any Local Area scoring relatively strongly, strongly or very strongly (4 or 5) against the criteria for one or more NPPF purpose was judged to be **strong** Green Belt overall:
- A local area scoring moderately (3) against at least one purpose and failing to score strongly against any purpose (4 or 5) was adjudged as **moderate** Green Belt: and
- A Local Area fulfilling the criteria relatively weakly, weakly or very weakly
 (1 or 2) across all purposes was deemed to be weak Green Belt.

The assessment also considers in more detail the presence of small-scale sub areas within Local Areas which might be less sensitive and thus able to accommodate change. In these cases, a further assessment considered the potential for Green Belt boundaries to be adjusted without significantly reducing ability to meet NPPF purposes. These recommendations will be taken forward to inform any decisions taken on amending the Green Belt boundaries following further assessment work.

The following sections examine the definition of each of the five purposes of the Green Belt in relation to local objectives and role of the Green Belt in terms of achieving its purpose locally, and set out the criteria and associated scoring applied.

4.4.1 Purpose 1

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

The original strategic purpose of the Metropolitan Green Belt was to check the sprawl of London. However, given only part of Elmbridge is directly adjacent to Greater London, this assessment also considers the role of Local Areas in restricting the sprawl of large built-up areas across the Borough and within neighbouring local authorities. These have been defined to correspond to the Tier

1 settlements (or equivalent) identified in the respective Local Plans for each local authority, both within and outside Elmbridge, to ensure a robust and evidence-based approach to the assessment (see Map 4.5; Table 4.1)¹⁵.

Although 'sprawl' is a multi-faceted concept and thus has a variety of different definitions, this Review has adopted a simple definition, considering sprawl as 'the outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way'. In order to appraise the extent to which the Green Belt keeps this in check, it is necessary to consider:

- a) Whether the Local Area falls at the edge of one or more distinct large built-up areas;
- b) The degree to which the Local Area is contained by built-form, and the nature of this physical containment, as well as the linkage to the wider Green Belt, as well as the extent to which the edge of the built-up area has a strongly defined, regular or consistent boundary.

Table 4.1 Large Built-Up Areas Considered in Purpose 1 Assessment

Elmbridge	Neighbouring Local Authorities
Greater London built-up area (Molesey / Thames Ditton / Long Ditton / Hinchley Wood) ¹⁶	Greater London built-up area (LB Richmond upon Thames, RB Kingston upon Thames and Epsom and Ewell) ¹⁸
Walton-on-Thames / Weybridge / Hersham ¹⁷	Staines-upon-Thames (Spelthorne) ¹⁹ Sunbury-on-Thames / Ashford / Stanwell (Spelthorne) ²⁰ Addlestone (Runnymede) ²¹ Chertsey (Runnymede) ²²

¹⁵ These were confirmed with officers from the respective neighbouring authorities at a workshop held on 19th May 2015.

¹⁶ For the purposes of the assessment, this includes all constituent parts of the continuous built-up area within Elmbridge which have coalesced with Greater London, including (but not limited to) Molesey, Thames Ditton, Long Ditton, and Hinchley Wood.

¹⁷ Walton-on-Thames, Weybridge and Hersham have already coalesced and will therefore be treated as one large built-up area for the purposes of this assessment.

¹⁸ For the purposes of the assessment, this includes all constituent parts of the continuous built-up area of Greater London within the London Borough of Richmond upon Thames and the London Borough of Kingston upon Thames, including (but not limited to): Hampton, Surbiton, Tolworth, and Chessington. Additionally, it encompasses the urban areas of Epsom and Ewell which have coalesced with Greater London.

¹⁹ Staines-upon-Thames is identified as the principal centre and employment area in the Spelthorne Core Strategy and Policies Development Plan Document (2009).

²⁰ The Sunbury-on-Thames, Ashford and Stanwell urban area was identified as an additional large built-up area at the workshop held with neighbouring and partner authorities on 19th May 2015.

²¹ Addlestone identified as one of three town centres in the Local Plan (2001) and identified as a 'large built-up area' in Runnymede Green Belt Review (December 2014).

²² Chertsey identified as one of three town centres in the Local Plan (2001) and identified as a 'large built-up area' in Runnymede Green Belt Review (December 2014).

Elmbridge	Neighbouring Local Authorities
	Egham / Englefield Green (Runnymede) ²³
	Woking / Byfleet / Woodham (Woking) ^{24,25}
	Guildford urban area (Guildford) ²⁶
	Ash and Tongham urban area (Guildford) ²⁷
	Dorking (including North Holmwood) (Mole Valley) ²⁸
	Leatherhead / Bookham / Fetcham (Mole Valley) ^{29,30}
	Ashtead (Mole Valley) ³¹

There are two stages in this assessment:

Assessment 1(a)

Firstly, a Local Area must be at the edge of one or more distinct large built-up areas in order to prevent development which would constitute sprawl. This criterion must therefore be met for Purpose 1 to be fulfilled and was applied on a *Pass/Fail* basis.

Assessment 1(b)

As stated at Assessment 1(a), Green Belt should function to protect open land at the edge of large built-up areas (Table 4.1). However, the extent to which a Local Area prevents sprawl is dependent on its relationship with the respective built-up areas. For those Local Areas that scored a 'Pass' for Assessment 1(a), Assessment 1(b) initially focussed on the degree to which Green Belt abuts built-up areas, the nature of this relationship and links to the wider Green Belt. The following criteria were used for assessment:

 A Local Area predominantly surrounded or enclosed by two or more distinct areas of built form and that also retains a strong link to the wider Green Belt,

²³ Egham identified as one of three town centres in the Local Plan (2001) and identified as a 'large built-up area' in Runnymede Green Belt Review (December 2014).

²⁴ Woking is identified as the main town in the Woking Core Strategy (2012).

²⁵ Woking, New Haw, Woodham, Byfleet, West Byfleet and Sheerwater are considered as one urban area in the assessment as these settlements have already coalesced. Also includes Brooklands Industrial Estate, which falls partially within Elmbridge.

²⁶ Guildford urban area identified as an 'urban area' (top tier settlement) in the Guildford Borough Settlement Hierarchy (2014).

²⁷ Ash and Tongham urban area identified as an 'urban area' (top tier settlement) in the Guildford Borough Settlement Hierarchy (2014). It is not labelled on Map 4.5 due to the map scale.

²⁸ Dorking (including North Holmwood) identified as a Principal Town in the Mole Valley Settlement Hierarchy (2008).

²⁹ Leatherhead identified as a Principal Town in the Mole Valley Settlement Hierarchy (2008).

³⁰ Leatherhead, Bookham, and Fetcham are considered as one urban area in the assessment as these settlements have already coalesced.

³¹ Ashtead was identified as an additional large built-up area on the basis of its population and area, following consultation with Mole Valley District Council.

would play a particularly important role in preventing sprawl. For the purpose of the assessment, this condition is referred to as 'contiguous'.

- A Local Area displaying a low level of containment by a large built-up area may prevent sprawl but to a lesser extent. This assessment refers to such areas as 'connected' with a large built up area.
- A Local Area, almost entirely contained or surrounded by built development
 which forms part of a single built-up area and has limited connections to the
 wider Green Belt, would only prevent sprawl to a limited extent (rather,
 potential development would likely be classified as infill), and is referred to as
 'enclosed' by a single built up area.

This initial assessment was supplemented by additional analysis on the role of Green Belt in preventing sprawl which would not otherwise be restricted by another barrier. The NPPF states that Local Authorities should 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent' (paragraph 85). Boundary identification reflected this, based on the following definitions:

- Examples of durable features (likely to be permanent):
 - Infrastructure: motorway; public and made road; a railway line; river.
 - Landform: stream, canal or other watercourse; prominent physical feature (e.g. ridgeline); protected woodland/hedge; existing development with strongly established, regular or consistent boundaries.
- Examples of features lacking in durability (soft boundaries):
 - Infrastructure: private/ unmade road; power line.
 - Natural: field boundary, tree line.

Where sprawl would not otherwise have been restricted by a durable boundary feature, the extent to which the existing built form had strongly established or recognisable boundaries was assessed, based on the following definitions:

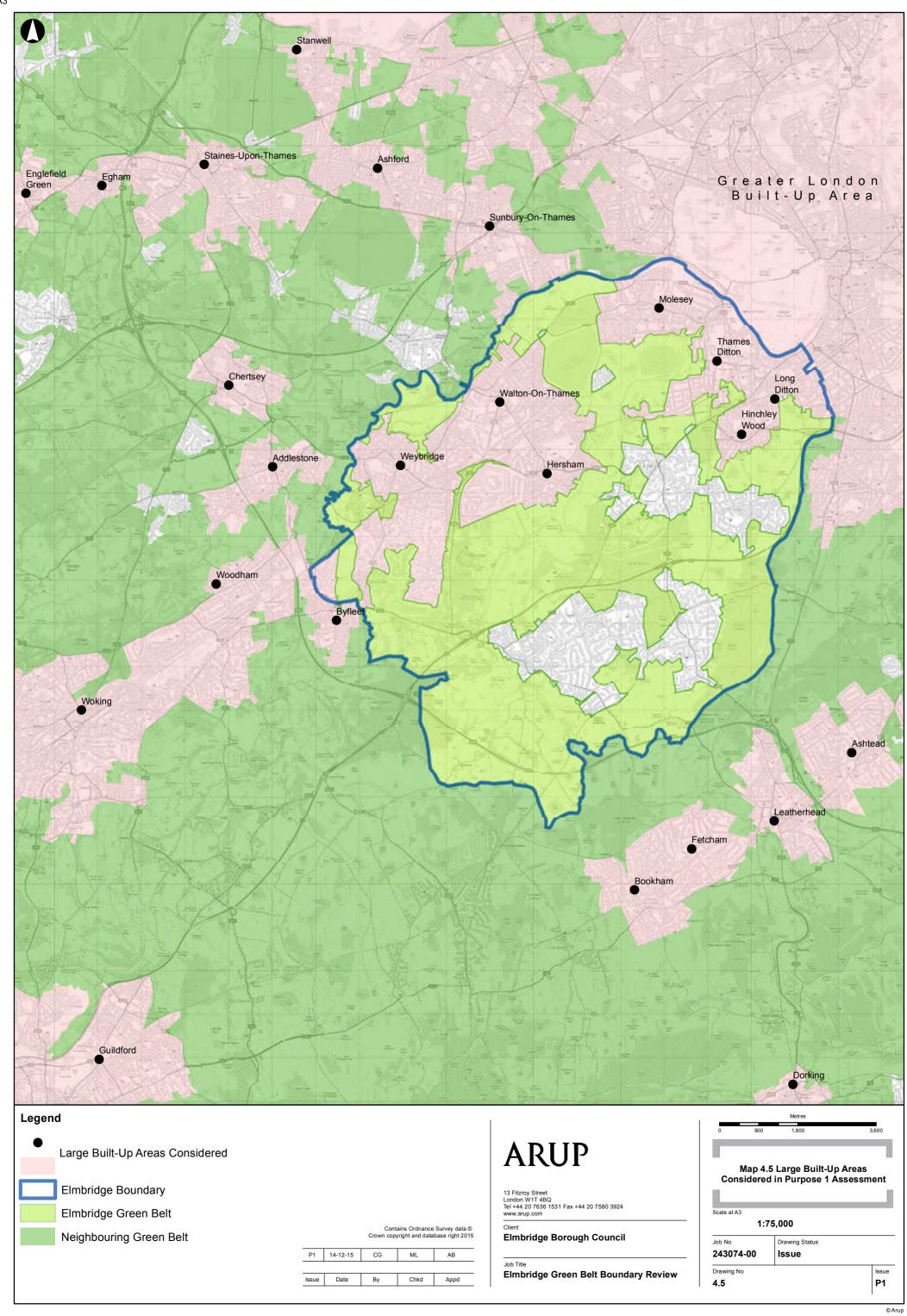
- 'Regular' or 'consistent' built form comprised well-defined or rectilinear built form edges, which would restrict development in the Green Belt.
- 'Irregular' or 'inconsistent' built form comprised imprecise or 'softer' edges, which would not restrict growth within the Green Belt.

Purpose 1 Assessment Criteria

The criteria used to assess the Local Areas against Purpose 1 are set out below. These multi-faceted criteria evolved following discussions with the Council and stakeholder consultation, and were developed in such a way that both the relationship between the Green Belt and large built-up areas and the strength of its boundaries may be considered without placing undue weight on Purpose 1 versus the wider NPPF purposes.

Table 4.2 Purpose 1 Assessment Criteria

Purpose	Criteria	Scores
To check the unrestricted sprawl of large built-	(a) Land parcel is at the edge of one or more distinct large built-up areas.	PASS: Land parcel meets Purpose 1. FAIL: Land parcel does not meet Purpose 1 and will score 0 for criteria (b).
up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.	 5+: Land parcel is contiguous with (a) large built-up area(s). The large built-up area(s) is/are predominantly bordered by features lacking in durability or permanence. 5: Land parcel is contiguous with (a) large built-up area(s), though the large built-up area(s) is/are predominantly bordered by prominent,
		permanent and consistent boundary features. 3+: Land parcel is connected to one or more large built-up area(s). The large built-up area(s) is/are predominantly bordered by features lacking in durability or permanence.
		3: Land parcel is connected to one or more large built-up area(s), though the large built-up area(s) is/are predominantly bordered by prominent, permanent and consistent boundary features.
		1+: Land parcel is enclosed by one distinct large built-up area. The large built-up area is predominantly bordered by features lacking in durability or permanence.
		1. Land parcel is enclosed by one distinct large built-up area, though the large built-up areas is predominantly bordered by prominent, permanent and consistent boundary features.
	Criterion Score	xx/5



4.4.2 Purpose 2

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

In addition to the clear function of this purpose in preventing towns from merging and therefore protecting existing gaps between towns, it also forms the basis for maintaining the existing settlement pattern. National policy provides no guidance over what might constitute 'towns' and whether this purpose should also take into consideration the gaps between smaller settlements.

Given the general concentration of development outside of the Green Belt in Elmbridge, the assessment of Local Areas considered gaps between all non-Green Belt settlements. Non-Green Belt settlements in Elmbridge were identified through the appropriate local development plans and in discussion with the Council. Settlements in neighbouring local authority areas adjacent to areas of Green Belt in Elmbridge were identified using adopted local plans (Table 4.3; Map 4.6)³².

Table 4.3 Settlements Considered in Purpose 2 Assessment

Elmbridge	Neighbouring Local Authorities ³³	
Greater London built-up area (Molesey / Thames Ditton / Long Ditton / Hinchley Wood)	Greater London built-up area (LB Richmond upon Thames, RB Kingston upon Thames and Epsom and Ewell)	
Walton-on-Thames / Weybridge / Hersham	Woking / Byfleet / Woodham (Woking and Runnymede) ³⁴	
Cobham / Oxshott	Addlestone (Runnymede)	
Esher	Chertsey (Runnymede)	
Claygate	Shepperton / Lower Halliford (Spelthorne)	
Field Common	Sunbury-on-Thames (Spelthorne)	
	Staines-upon-Thames (Spelthorne)	
	Upper Halliford (Spelthorne)	
	Ashtead (Mole Valley)	
	Leatherhead / Bookham / Fetcham (Mole Valley)	
	East Horsley (Guildford) ³⁵	

The extent to which an area of Green Belt protects a land gap was assessed using the following definitions:

³² These were confirmed with officers from the respective neighbouring authorities at a workshop held on 19th May 2015.

³³ Neighbouring settlements were defined as those adjacent to Elmbridge's boundary.

³⁴ Woking, New Haw, Woodham, Byfleet, West Byfleet and Sheerwater are considered as one urban area in the assessment as these settlements have already coalesced. Also includes Brooklands Industrial Estate, which falls partially within Elmbridge.

³⁵ East Horsley was identified as an additional settlement for consideration in Purpose 2 following consultation with Guildford Borough Council.

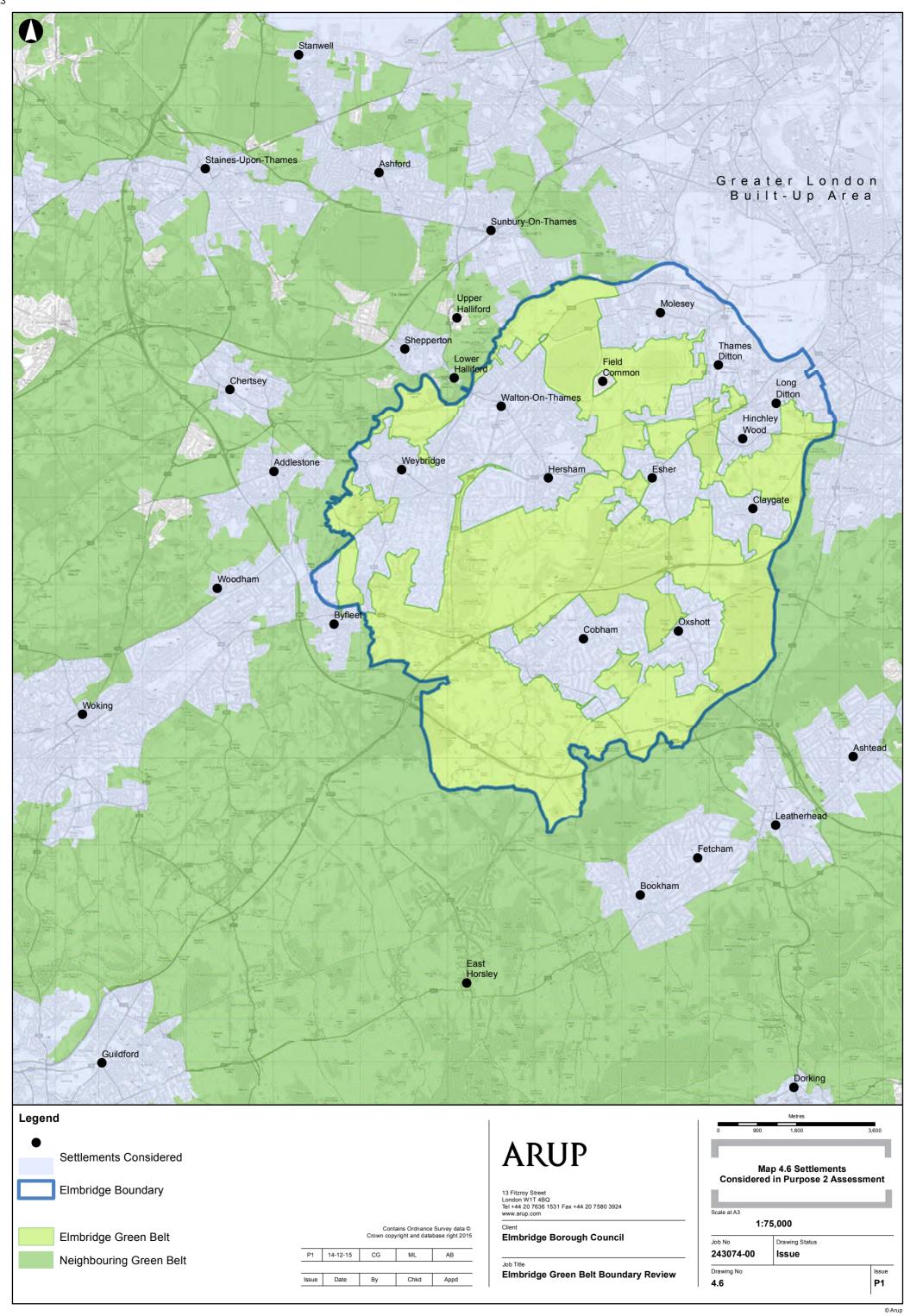
- 'Essential gaps', where development would significantly reduce the perceived or actual distance between settlements.
- 'Wider gaps', where limited development may be possible without coalescence between settlements.
- 'Less essential gaps', where development is likely to be possible without any risk of coalescence between settlements.

Purpose 2 Assessment Criteria

The criteria used to assess the Local Areas against Purpose 2 are set out in Table 4.4.

Table 4.4 Purpose 2 Assessment Criterion

Purpose	Criterion	Scores
To prevent neighbouring towns from merging	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements.	5: An 'essential gap' between non-Green Belt settlements, where development would significantly visually or physically reduce the perceived or actual distance between them. 3: A 'wider gap' between non-Green Belt settlements where there may be scope for some development, but where the overall openness and the scale of the gap is important to restricting merging. 1: A 'less essential gap' between non-Green Belt settlements, which is of sufficient scale and character that development is unlikely to cause merging between settlements. 0: Land parcel does not provide a gap between any settlements and makes no
Total score		discernable contribution to separation. xx/5



4.4.3 Purpose 3

Purpose 3: To assist in safeguarding the countryside from encroachment

This purpose seeks to safeguard the countryside from encroachment, or a gradual advancement of urbanising influences through physical development or land use change. The assessment considered openness and the extent to which the Green Belt can be characterised as 'countryside', thus resisting encroachment from development. Openness refers to the extent to which Green Belt land could be considered open from an absence of built development rather than from a landscape character perspective, where openness might be characterised through topography and presence or otherwise of woodland and hedgerow cover.

Historic open land uses associated with the urban fringe and urban characteristics as well as the countryside exist in the Elmbridge Green Belt and include, but are not limited to, mineral working and landfill, public utilities, motorways and their intersections, educational institutions, hotels and some small areas of residential development. Some of these semi-urban uses have an impact on the 'openness' of the Green Belt as identified in the assessment.

Purpose 3 Assessment Criteria

The criteria used to assess the Local Areas against Purpose 3 are set out below. Ordnance Survey base maps and aerial photography were reviewed in order to undertake the openness assessment.

The percentage of built form within a Local Area was calculated using GIS tools based on the land area of features that are classified as manmade (constructed) within the Ordnance Survey MasterMap data, excluding roads and railway lines. The data includes buildings, some surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures.

The score attributed to a Local Area was initially determined on the basis of the percentage built form. Scores were considered further in light of qualitative assessments of character, undertaken through site visits and revised as judged appropriate³⁶. This assessment considered, in particular, the extent to which Local Areas might be reasonably identified as 'countryside' / 'rural' (in line with the NPPF). In order to differentiate between different areas, broad categorisation was developed encompassing assessments of land use (including agricultural use), morphology, context, scale and links to the wider Green Belt:

 'Strong unspoilt rural character' was defined as land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.

³⁶ For example, Local Areas with a relatively low level of built form (i.e. between 20-30%) and a largely rural character would score 3; however a Local Area with a relatively low level of built form (i.e. between 20-30%) but with an urban character (such as formal open space designation covering the entire Local Area) would score 1. In practice, these revisions only applied to a few Local Areas as the character and the percentage of built form were generally aligned, as per the score definitions.

- 'Largely rural character' was defined as land with a general absence of built development, largely characterised by rural land uses and landscapes but with some other sporadic developments and man-made structures.
- 'Semi-urban character' was defined as land which begins on the edge of the fully built up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
- 'Urban character' was defined as land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

Table 4.5 Purpose 3 Assessment Criterion

Purpose	Criterion	Score
Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.	5: Contains less than 3% built form and possesses a strong unspoilt rural character.4: Contains less than 5% built form and/or possesses a strong unspoilt rural character.
		3: Contains less that 10% built form and/or possesses a largely rural character.
		2: Contains less than 15% built form and/or possesses a largely rural character.
		1: Contains more than 15% built form and/or possesses an urban character.
		0: Contains more than 20% built form and possesses an urban character.
Total score		xx/5

4.4.4 Purpose 4

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

This purpose serves to protect the setting of historic settlements by retaining the surrounding open land or by retaining the landscape context for historic centres. As outlined in the advice note published by PAS³⁷, the assessment of this purpose relates to very few settlements in practice, due largely to the pattern of modern development that often envelopes historic towns today. Cambridge is a good example of a settlement where the setting of the historic centre is contextualised

³⁷ Planning Advisory Service (2015) Planning on the Doorstep: The Big Issues – Green Belt.

by rural features, where the views across the 'backs' retain a special status in planning terms.

Following discussions with the Council, it was determined that Purpose 4 was not relevant to the Elmbridge Green Belt Boundary Review given that there were considered to be no instances where historic towns/cores directly abutted the Green Belt and where the Green Belt played a functional role in the setting of such historic settlements. Whiteley Village, a retirement village located near to Hersham, was initially considered given its arts and crafts architecture but was not considered to be of a scale of historic significance identified as being relevant to the purpose.

As a result, Purpose 4 was excluded from the Review.

4.4.5 Purpose 5

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

Purpose 5 focuses on assisting urban regeneration through the recycling of derelict and other urban land. As outlined in Section 3, the advice note issued by PAS suggests that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. Therefore, assessment of Green Belt against this purpose will not enable a distinction between Local Areas as all Green Belt achieves the purpose to the same extent.

Furthermore, during engagement with the Council, it was confirmed that there are no planned urban regeneration schemes that were being inhibited by Green Belt designations.

As a result, Purpose 5 was excluded from the Review.

4.5 Pro-Forma

The pro-forma templates for the Strategic Green Belt Area Assessment and Local Green Belt Area Assessment are provided in Appendix B and Appendix C respectively.

4.6 Recommendations

Upon completion of the Local Green Belt Area Assessment and following a revisit of the outcome of the Strategic Green Belt Area Assessment, the criteria scores for Purposes 1-3 were collated and tabulated across all of the Local Areas, to highlight those areas meeting the purposes to a lesser or greater extent. Key findings and final recommendations are set out in sections 5 and 6 respectively.

Local Areas which meet the Green Belt purposes strongly have been identified clearly and the recommendation made to the Council that these Local Areas are less preferable for release.

Weaker performing Local Areas, as well as small-scale sub area within Local Areas which might be less sensitive and thus able to accommodate change, have

also been identified and recommended for particular attention in future assessment work as there could be the potential to adjust the Green Belt boundary without significantly impacting on the NPPF purposes and fundamental aim of Green Belt.

The Council's approach is to assess all parcels, regardless of their strength in Green Belt terms, against a number of constraints that could impact on an areas' ability to accommodate future growth. This information together with the recommendations from the Green Belt Boundary Review will then be used by the Council to make a decision as to whether exceptional circumstances exist that outweigh the strength of the Green Belt, allowing development to take place.

5 Key Findings

5.1 Strategic Green Belt Area Assessment

As set out in section 4, the Strategic Green Belt Area Assessment considered three broad geographical areas and focussed on the following aspects:

- The role of Elmbridge Green Belt within the wider sub-regional context of the Metropolitan Green Belt; and
- The different functional areas of Green Belt within the Borough.

The completed pro-formas for the Strategic Assessment are provided in Annex Report 1.

Strategically, the three geographical areas function slightly differently in the context of the Green Belt purposes set out in the NPPF, with each playing its own unique role at the sub-regional and Borough level.

5.1.1 Strategic Area A

Strategic Area A is a narrow and fragmented band of Green Belt which closely abuts the very edge of south-west London, stretching from Heathrow Airport to Epsom. This strategically important arc of green spaces provides a narrow break between the built-form of outer London and a series of Surrey towns, including Walton-on-Thames, Hersham, Esher and Claygate in Elmbridge.

As Green Belt, the Area's key roles are with respect to Purposes 1 and 2, meeting both of these **very strongly**. It acts as an important barrier to potential sprawl from the Greater London built-up area and a number of large built-up areas within Surrey, including several within Elmbridge, and establishes important gaps between a number of Surrey towns, preventing their merging into one another and the Greater London built-up area. However, it meets Purpose 3 **weakly** due to the fragmented nature of the Green Belt and the prevalence of man-made/industrial uses.

The importance of the Strategic Area as part of a wider Green Belt network must be acknowledged, yet there is a sense that in some of the more fragmented and/or degraded parts of the Green Belt change could be accommodated without causing any further harm to its integrity.

5.1.2 Strategic Area B

Strategic Area B forms part of a wide Green Belt buffer which broadly maintains separation between a series of distinct towns and villages in Surrey, Berkshire and Buckinghamshire, as well as the outer-most fringes of London around Hillingdon. Although the coherence and continuity of the Green Belt varies significantly, overall this broad arc of Green Belt maintains narrow gaps between towns in Elmbridge, Spelthorne, Runnymede and Woking, as well as Mole Valley and Epsom and Ewell, thus maintaining the settlement pattern.

The main functions of this Area in Green Belt terms, similarly to Strategic Area A, are to prevent sprawl from large built-up areas and establish important gaps between several towns, though this time within Surrey, Berkshire and Buckinghamshire. It therefore meets Purposes 1 and 2 **strongly**. It also prevents encroachment into some relatively unspoilt areas of countryside, the first areas moving outwards from London, thus meeting Purpose 3 **moderately**. However, it is noted that there is significant variation in character across the area.

Given the Strategic Area protects a series of particularly narrow gaps between settlements, the character of the Area could be altered significantly by alterations to Green Belt boundaries. Consideration should also be given to the Area's particular sense of rurality, though some areas which contain developments may be less sensitive overall.

5.1.3 Strategic Area C

Strategic Area C is intrinsically linked with a large unbroken swathe of Green Belt extending outwards over the Surrey countryside, including the Surrey Hills Area of Outstanding Natural Beauty (AONB), towards Woking, Guildford, Dorking and the North Downs beyond.

At the sub-regional level, the Area maintains the relatively unspoilt character of the Surrey countryside by preventing the encroachment of development into rural areas, thus meeting Purpose 3 **strongly**. In several locations, it maintains gaps between Surrey settlements, meeting Purpose 2 **strongly**. While in comparison to Strategic Areas A and B it plays a lesser role in preventing the sprawl of large built-up areas, Strategic Area C still meets Purpose 1 **moderately** by acting as an important barrier to potential sprawl from the Guildford urban area, Ash and Tongham urban area, Dorking, and Leatherhead / Bookham / Fetcham / Ashtead.

The Strategic Area includes some of the most open areas in the Borough and wider sub-region and, especially given that it protects a particularly narrow gap between adjacent settlements, the landscape may have particular sensitivities if the Green Belt boundaries were to be amended.

5.1.4 Summary

Table 5.1 summarises the overall strength of the three Strategic Areas against NPPF Purposes 1-3, as well as the fundamental aim of Green Belt in '[preventing] urban sprawl by keeping land permanently open' (paragraph 79).

Table 5.1 Summary of Overall Findings from Strategic Area Assessment

Strategic Area	Meets the Fundamental Aim?	Strength against Purpose 1	Strength against Purpose 2	Strength against Purpose 3
A	Yes	Very Strong	Very Strong	Weak
В	Yes	Strong	Strong	Moderate
C	Yes	Moderate	Strong	Strong

5.2 Local Area Assessment

5.2.1 Local Areas for Assessment

A total of 78 Local Areas and two Non-Green Belt Areas were identified for assessment (see Map 4.4). It should be noted that the numbering of the Local Areas is not strictly sequential due to adjustments to the parcels during identification (e.g. further sub-division and combining of parcels as deemed appropriate). The two non-Green Belt parcels (identified reserve housing sites) are labelled N1 and N2 respectively.

5.2.2 Local Areas

The Local Areas were assessed against Purpose 1-3 of the NPPF Green Belt purposes. As set out in section 4, the fourth and fifth purposes were not assessed. The completed pro-formas for each Local Area can be found in Annex Report 2.

Table 5.2 sets out the scores for each Local Area against NPPF Purposes 1-3. The scoring is illustrated spatially in Maps 5.1 - 5.3.

5.2.2.1 Purpose 1 Assessment

30 of the 78 Local Areas (38%) do not lie at the edge of an identified large built-up area and thus do not directly prevent sprawl. These Local Areas therefore fail to meet Purpose 1 as per the scoring criteria set out in Table 4.2. These are identified in Table 5.2 and Map 5.1. While some of these Local Areas abut the edges of settlements, they play no role in preventing the sprawl of 'large built-up areas' (in reference to the specific policy set out in NPPF Paragraph 80, and defined for the purposes of this Review in section 4.4.1 of this report). In a small number of instances, specifically in the case of Local Areas 2, 3, 10 and 73, only small areas of Green Belt separate Local Areas from large built-up areas. These cases have been noted qualitatively in the pro-formas in Annex Report 2.

Notably, a further 12 Local Areas (15%) (36, 37, 50, 51, 53, 58, 65, 70, 71, 72b, 74 and 77) score 1 or 1+ and meet this Purpose only weakly. These parcels are 'enclosed' within the extent of a single large built-up area and thus do little to prevent their outward sprawl. The majority of these parcels are located in the north-east of Elmbridge at the edge of Greater London, where the Green Belt is noted as being fragmented and piecemeal, the result of historic patterns of sprawl that perpetuated during the rapid growth of London in the late 19th and early 20th centuries.

31 Local Areas (40%) are 'connected' to large built-up areas and score 3 or 3+. Given Elmbridge's proximity to Greater London and its own urban context, it is perhaps unsurprising that such a high proportion of the Green Belt meets this purpose. Of these Local Areas, eight (22, 39, 40, 41, 42, 47, 49 and 68) score 3+ and thus play a heightened role in preventing sprawl by providing a barrier where the boundary between the Green Belt and the large built-up area is not robust, durable or readily recognisable.

Five Local Areas (6%) (25, 26, 59a, 69 and 75a) score 5, therefore meeting Purpose 1 strongly. These clusters of parcels in the north-east and south-west of Elmbridge play a particularly important role in preventing sprawl into open land by way of their containment by at least two, distinct large built-up areas.

5.2.2.2 Purpose 2 Assessment

17 out of 78 Local Areas (22%) fail to meet Purpose 2 as per the scoring criteria set out in Table 4.4. These are identified in Table 5.2 and Map 5.2. These land parcels are deemed to make no discernable contribution to the separation of settlements, generally as a result of their small scale and containment within the settlement footprint (for example, Local Areas 51 and 53) or their weak linkage to the wider Green Belt (for example, Local Areas 16 and 24).

A further 13 Local Areas (17%) score 1 and meet Purpose 2 only weakly. These parcels form an integral part of, or the entirety of, less essential gaps between towns, both in Elmbridge and in neighbouring local authority areas. These gaps tend to be large in scale and configured in such a way that development would be possible without resulting in the coalescence of settlements. Some Local Areas scoring weakly against this Purpose (for example, Local Areas 17 or 58) play a lesser role as part of a smaller gap.

Most Local Areas (25 in total; 32%) meet this Purpose moderately, scoring 3 against the criteria. These land parcels are important for maintaining the general openness and scale of different gaps, but as a result of their configuration may be able to accommodate some development which would not result in coalescence.

23 Local Areas (29%) meet Purpose 2 strongly (a score of 5) by providing the whole of, or a substantial part of, essential, narrow gaps between towns. These gaps tend to be of a very small scale, such that any development would lead to the physical coalescence of settlements. Alternatively, Local Areas may be particularly important as a result of local topography which results in a reduction in the perceptual distance between settlements (Local Areas 29 and 31 are particular examples of this). The majority of Local Areas in the north-east of Elmbridge, where there are a series of very narrow gaps between different settlements, meet this purpose strongly.

5.2.2.3 Purpose 3 Assessment

The vast majority of Local Areas meet this purpose to a greater or lesser extent, as per the scoring criteria set out in Table 4.5. Only one Local Area (25) scores 0. This land parcel, which encompasses part of the Brooklands Business Park, has an urban character and contains a significant amount of built form, thus could not be described as 'countryside'. However, aside from this, there is significant variation in the scoring of this Purpose across Elmbridge.

There are 29 Local Areas (37%) which score 1 or 2, thus meeting this Purpose only weakly (see Table 5.2 and Map 5.3). This is reflective of the piecemeal nature of the Green Belt in much of Elmbridge, particularly in the north of the Borough adjacent to Greater London and around the Thames valley, and the

relatively high level of existing encroachment in many urban fringe areas which diminishes the rural character of the Green Belt in these areas.

33 Local Areas (42%) meet this purpose moderately, demonstrating a largely rural character but with some evidence of encroachment.

The remaining 15 Local Areas (19%) score 4 or 5 and thus meet this Purpose strongly. These land parcels maintain a strong unspoilt rural character with a high level of openness and development within these areas would be considered encroachment into the countryside. The most unspoilt and thus strongest scoring parcels for this purpose tend to be concentrated in the south and east of the Borough.

5.2.3 Non-Green Belt Areas

Two non-Green Belt Local Areas, the remaining reserve housing sites, were assessed against Purpose 1-3 of the NPPF Green Belt purposes to identify potential scope for designation as Green Belt.

Local Area N1 scored moderately across Purposes 1, 2 and 3, while Local Area N2 failed to meet Purposes 1 or 2 and scored only very weakly (1) against Purpose 3.

5.3 Overall Summary

All 80 Local Areas (Green Belt and non-Green Belt) meet one or more of the NPPF purposes to varying degrees. The individual purpose scores for sub-areas are set out in Table 5.2 and Maps 5.1-5.3.

In order to summarise the outcomes from the assessment, the Local Areas have been categorised as follows:

- 36 Local Areas are judged to be **strong** Green Belt, meeting **at least one** of the purposes strongly (scoring 4 or 5);
- 31 Local Areas are judged to be **moderate** Green Belt, scoring moderately (3) against at least one purpose and failing to score strongly against any purpose (4 or 5);
- 13 Local Areas are judged to be **weak** Green Belt, failing to meet or weakly meeting **all** purposes (scoring 1 or 2). The categorisation of Local Areas is also set out in Table 5.2 and in Map 5.4.

Table 5.2 Overall Summary of Findings for Purposes Assessment

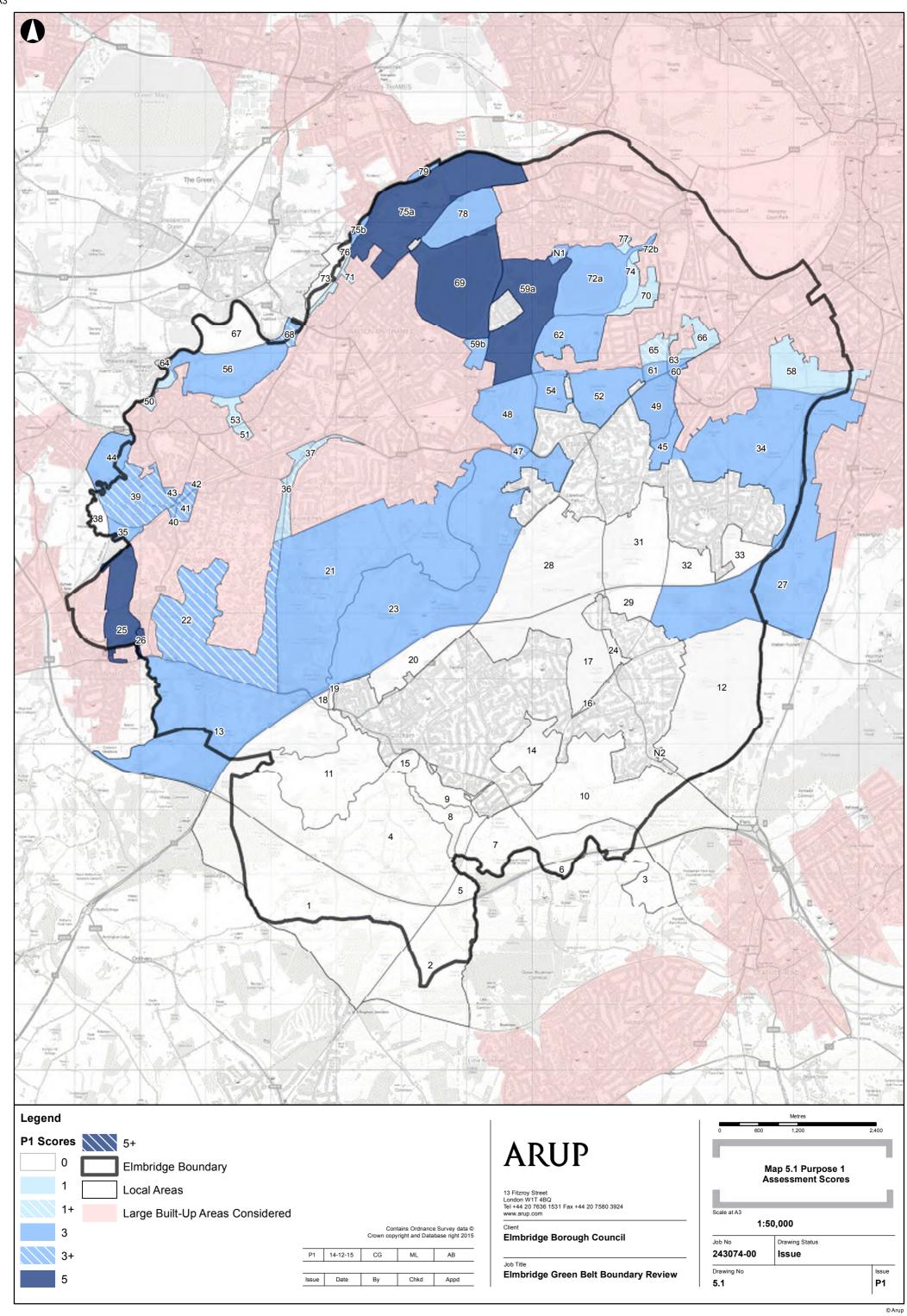
Local Area	Area (ha)			Purpose Assessments		Overall
		Purpose 1 – To chec built-up areas	k the unrestricted sprawl of large	Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Summary
		(a) Land parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	
1	453.4	FAIL	0	1	4	Strong
2	186.1	FAIL	0	3	5	Strong
3	51.2	FAIL	0	3	2	Moderate
4	471.6	FAIL	0	1	3	Moderate
5	16.2	FAIL	0	3	5	Strong
6	8.6	FAIL	0	3	5	Strong
7	128.5	FAIL	0	3	2	Moderate
8	29.0	FAIL	0	1	5	Strong
9	50.5	FAIL	0	1	3	Moderate
10	291.8	FAIL	0	3	4	Strong
11	161.4	FAIL	0	1	3	Moderate
12	268.9	FAIL	0	3	5	Strong
13	300.2	PASS	3	3	2	Moderate
14	65.1	FAIL	0	1	2	Weak
15	11.8	FAIL	0	1	5	Strong
16	1.9	FAIL	0	0	3	Moderate
17	145.7	FAIL	0	1	5	Strong

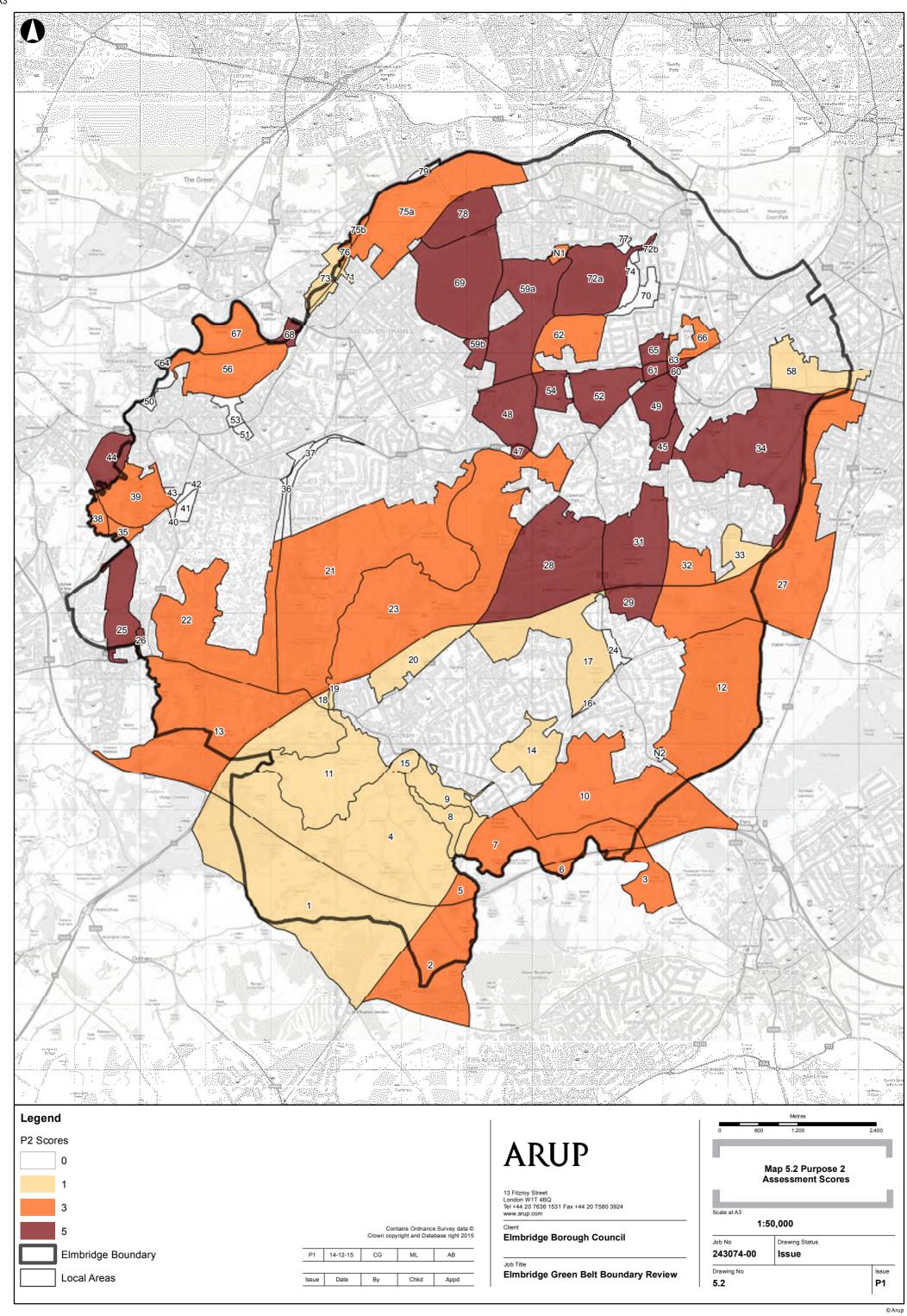
Local Area	Area (ha)			Purpose Assessments		Overall
		Purpose 1 – To check the unrestricted sprawl of large built-up areas	Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Summary	
		(a) Land parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	
18	4.5	FAIL	0	1	2	Weak
19	2.6	FAIL	0	1	3	Moderate
20	61.5	FAIL	0	1	2	Weak
21	455.8	PASS	3	3	3	Moderate
22	197.8	PASS	3+	3	2	Moderate
23	431.6	PASS	3	3	3	Moderate
24	10.0	FAIL	0	0	3	Moderate
25	67.7	PASS	5	5	0	Strong
26	3.8	PASS	5	5	2	Strong
27	344.8	PASS	3	3	3	Moderate
28	219.2	FAIL	0	5	2	Strong
29	35.8	FAIL	0	5	5	Strong
31	123.6	FAIL	0	5	5	Strong
32	41.3	FAIL	0	3	5	Strong
33	35.8	FAIL	0	1	5	Strong
34	231.5	PASS	3	5	3	Strong
35	10.1	PASS	3	3	2	Moderate
36	13.5	PASS	1	0	1	Weak

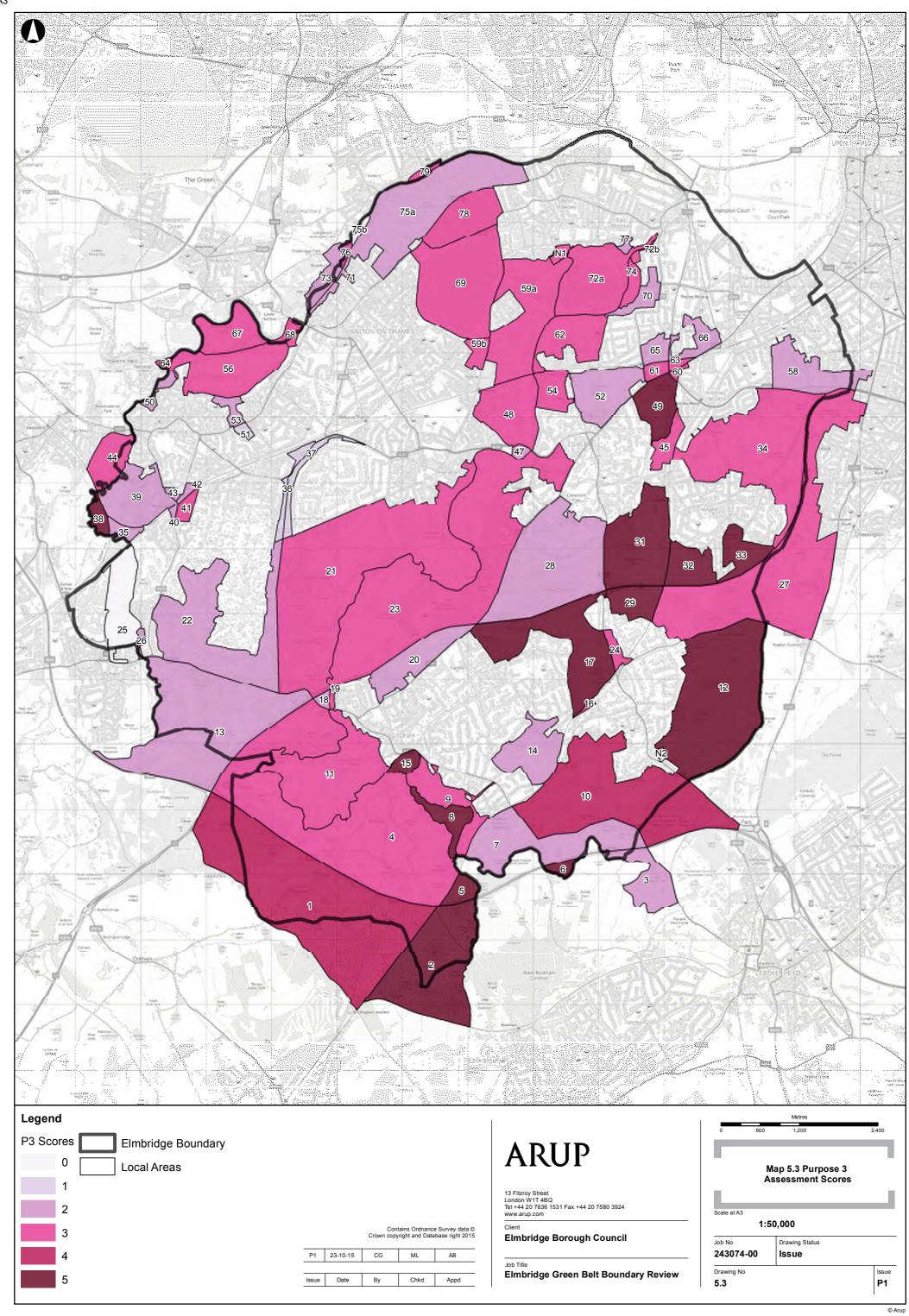
Local Area	Area (ha)			Purpose Assessments		Overall Summary
		Purpose 1 – To check the unrest built-up areas	ek the unrestricted sprawl of large	Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	
		(a) Land parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	
37	17.6	PASS	1+	0	1	Weak
38	13.2	FAIL	0	3	5	Strong
39	73.3	PASS	3+	3	2	Moderate
40	2.2	PASS	3+	0	2	Moderate
41	10.0	PASS	3+	0	3	Moderate
42	3.9	PASS	3+	0	2	Moderate
43	2.5	PASS	3	0	2	Moderate
44	40.0	PASS	3	5	3	Strong
45	20.5	PASS	3	5	3	Strong
47	4.6	PASS	3+	5	2	Strong
48	78.0	PASS	3	5	3	Strong
49	45.3	PASS	3	5	5	Strong
50	9.9	PASS	1	0	2	Weak
51	4.1	PASS	1	0	1	Weak
52	67.6	PASS	3	5	2	Strong
53	11.0	PASS	1	0	2	Weak
54	27.8	PASS	3	5	3	Strong
56	96.6	PASS	3	3	3	Moderate

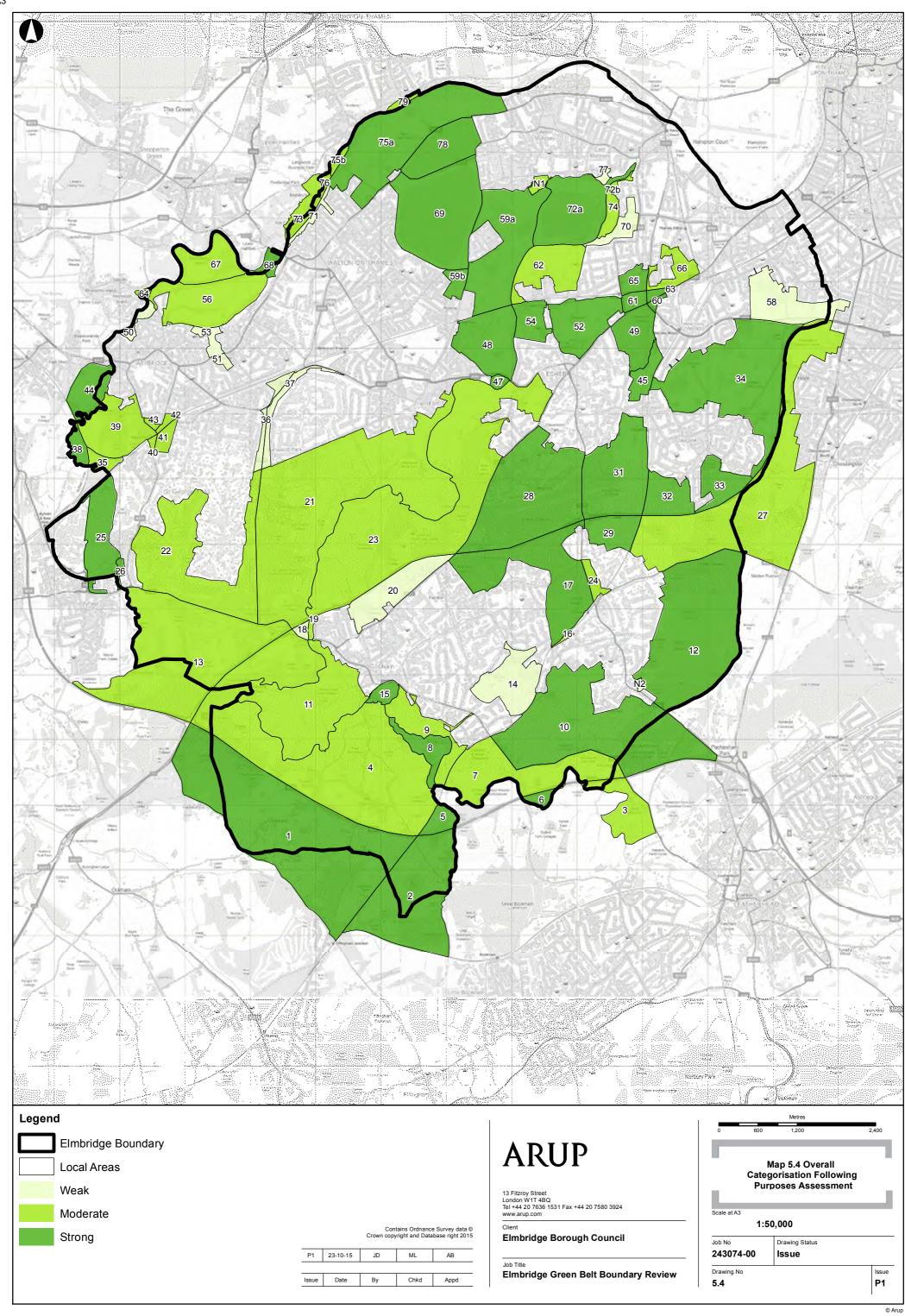
Local Area	Area (ha)			Purpose Assessments		Overall
		Purpose 1 – To check the unrestricted sprawl of large built-up areas	Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Summary	
		(a) Land parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	
58	67.3	PASS	1	1	2	Weak
59a	133.8	PASS	5	5	3	Strong
59b	12.4	PASS	3	5	3	Strong
60	2.8	PASS	3	5	3	Strong
61	9.3	PASS	3	5	3	Strong
62	62.3	PASS	3	3	3	Moderate
63	4.3	PASS	3	5	3	Strong
64	2.9	FAIL	0	0	3	Moderate
65	15.0	PASS	1+	5	2	Strong
66	23.1	PASS	1	3	2	Moderate
67	52.7	FAIL	0	3	3	Moderate
68	10.1	PASS	3+	5	3	Strong
69	173.6	PASS	5	5	3	Strong
70	19.2	PASS	1	0	2	Weak
71	7.5	PASS	1+	1	2	Weak
72a	102.1	PASS	3	5	3	Strong
72b	3.2	PASS	1	0	3	Moderate
73	23.4	FAIL	0	3	2	Moderate

Local Area	Area (ha)	Purpose Assessments				Overall
		Purpose 1 – To check the unrestricted sprawl of large built-up areas		Purpose 2 – To prevent neighbouring towns from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Summary
		(a) Land parcel is at the edge of one or more distinct large built-up areas	(b) Prevents the outward sprawl of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary	Prevents development that would result in merging of or significant erosion of gap between neighbouring settlements, including ribbon development along transport corridors that link settlements	Protects the openness of the countryside and is least covered by development	
74	12.7	PASS	1	0	3	Moderate
75a	188.0	PASS	5	3	2	Strong
75b	4.9	PASS	3	3	0	Moderate
76	3.9	FAIL	0	3	3	Moderate
77	3.1	PASS	1	0	2	Weak
78	62.5	PASS	3	5	3	Strong
79	4.9	PASS	3	0	3	Moderate
N1	5.4	PASS	3	3	3	Moderate
N2	2.0	FAIL	0	0	1	Weak









6 Recommendations

Following the Strategic and Local Assessments, a series of recommendations have been identified which the Council may wish to take forward for further consideration in a second phase of more detailed assessment work.

While it is clear that the majority of the Green Belt in Elmbridge is performing an important role in terms of the NPPF purposes, as well as the fundamental aim of Green Belt, a number of weaker areas have been identified which may warrant further consideration. These varying recommendations can broadly be split into the following categories:

- Local Areas which perform weakly against the NPPF purposes and could be considered further. This would include an assessment of constraints to development (e.g. flooding) and the consideration of whether 'exceptional circumstances' exist to justify any alterations to the Green Belt boundary.
- 2. Moderately or strongly performing Local Areas where there is clear scope for sub-division to identify weakly performing sub-areas for further consideration in accordance with the above provisions.
- 3. Non-Green Belt Areas which could be considered for inclusion in the Green Belt. This would also include the consideration of whether 'exceptional circumstances' exist to justify any alterations to the Green Belt boundary. In accordance with the NPPF, this would apply equally to any additions to the Green Belt as it would to any subtractions.
- 4. Anomalous boundaries which should be amended to ensure the Green Belt boundary is both readily recognisable and likely to be permanent, in line with national policy.

The following section of the report describes and justifies the various recommendations in terms of both the Local and Strategic Assessments.

Recommendations in categories 1-3 are illustrated in Map 6.1, whilst detailed maps are provided for those in category 4 in Table 6.1.

The recommendations of this report should only be applied to Green Belt land located within Elmbridge Borough. They should not be used to directly influence the approaches to Green Belt in neighbouring authorities and no recommendations have ultimately been made beyond the boundaries of Elmbridge.

Any amendments to the Green Belt should not however be considered in isolation. This is particularly the case where the recommendations apply to those Local Area parcels adjacent to the Borough boundary. Where it is recommended that the Council may wish to take forward for further consideration some parcels, and where these parcels cross the administrative boundary, consideration should only be given to the area within Elmbridge Borough. As Green Belt is a cross-boundary strategic issue, further discussions are however, likely to ensue with neighbouring authorities as part of this work. The Council should be particularly mindful that any proposed amendments should not leave small, isolated 'pockets' of Green Belt in another Borough or District.

6.1 Weakly Performing Local Areas

The following Local Areas or clusters of Local Areas have been identified as weakly performing (Table 5.2) and warrant further consideration in future work.

6.1.1 Local Area 14

Local Area 14 fails to meet Purpose 1 as it is not located at the edge of a large built-up area (Cobham / Oxshott not being defined as a 'large built-up area'). As a result of it being nearly fully enclosed within the settlement footprint of Cobham, which largely envelops the land parcel to the east, it is judged as meeting Purpose 2 weakly, playing only a less essential role in preventing coalescence with Leatherhead or Fetcham. Finally, the continuity of the countryside within the Local Area is highly fragmented as a result of its managed status, level of previous encroachment and weak linkage with the wider countryside, thus it is deemed to meet Purpose 3 weakly.

Local Area 14 falls within Strategic Area C, the key functions of which are to prevent the coalescence of towns within Surrey and encroachment into the countryside. It is not felt that the release of Local Area 14 would have any impact on the ability of this broader Strategic Area in meeting this role, nor is it felt that, in relative terms, the Local Area is as equally sensitive to change as the Strategic Area. The particularly open character of the broad area is noted in the assessment, a characteristic not displayed within this Local Area.

Recommendation: Local Area 14 performs weakly against the NPPF purposes and could be considered further.

6.1.2 Local Area 16

Local Area 16 meets neither Purpose 1 nor 2, as it is not located at the edge of a large built-up area (Cobham / Oxshott not being defined as such), and is of such a small scale and effectively enveloped within the settlement footprint of Oxshott that it plays no role in maintaining separation between settlements. The parcel is adjudged as performing a moderate role with respect to preventing encroachment into the countryside (Purpose 3) and thus is classified as moderate Green Belt overall. However, there are particular circumstances which warrant further consideration here.

Although it consists of an area of land which, in terms of level of built form, is highly open and rural in terms of land use, the parcel is of such a small scale and severed from the wider Oxshott Heath to the north by the New Guildford railway line, which forms a hard and defensible edge along its northern boundary. This weakens its relationship with the wider countryside to the north. Of additional importance is its role with respect to the broader strategic functions of Strategic Area B, in which the parcel sits. These main roles are to prevent sprawl and maintain the gaps between Surrey towns, yet Local Area 16 makes no contribution to either of these roles.

Thus, while at the local scale the Local Area may play a limited role in preventing encroachment, its limited relationship with the countryside to the north and weak role in terms of the wider strategic Green Belt network would suggest that it should be afforded further consideration.

Recommendation: Local Area 16 performs moderately against the NPPF purposes but, as a result of particular circumstances described previously, could be considered further.

6.1.3 Local Areas 18 and 19

Local Area 18 fails to meet Purpose 1 as it is not located at the edge of a large built-up area (Cobham / Oxshott not being defined as a 'large built-up area'). As a result of its very small scale and severance from surrounding Green Belt by infrastructure and natural features, it is judged as meeting Purpose 2 weakly, playing a less essential role in preventing coalescence between Cobham / Oxshott and Weybridge. The Local Area has a semi-urban character as a result of its land uses and relationship with surrounding urban features, therefore meeting Purpose 3 weakly.

Local Area 19, immediately abutting Local Area 18 to the east, makes a similarly weak contribution to Purposes 1 and 2. Although it was judged to contribute moderately to Purpose 3 as a result of its open character, it is very small in scale and intrinsically linked to the built-up areas around it, as well as Local Area 18 to the west. As a result, despite the variance in scores, Local Areas 18 and 19 should be considered together as a cluster.

Local Areas 18 and 19 overlap Strategic Areas B and C. It is not felt that release of either of the two parcels, which are physically severed from the wider Green Belt, would compromise the broader role of these Strategic Areas in preventing the coalescence of settlements or restricting encroachment. As noted in the assessment of Strategic Area B, areas of Green Belt which already contain development would be less sensitive to change.

Recommendation: Local Area 18 performs weakly against the NPPF purposes and, together with the adjacent Local Area 19, could be considered further.

6.1.4 Local Area 20

Local Area 20 fails to meet Purpose 1 as it is not located at the edge of a large built-up area (Cobham / Oxshott not being defined as a 'large built-up area'). With regards to Purpose 2, the parcel makes only a very limited contribution to the overall gap between Cobham / Oxshott and Hersham, with little risk that development would cause physical or visual coalescence of the settlements. The A3, which acts as a significant severance from the wider Green Belt to the north, diminishes this role further. The Local Area is heavily influenced by urban developments, both within and directly adjacent. A hotel and pub, sports club and ancillary buildings, and dwelling reduce the openness in the east, while to the west there are further residential dwellings. Thus, as a result of weak linkage with the countryside and previous encroachment, Local Area 20 only meets Purpose 3 weakly.

The Local Area is part of Strategic Area B, the primary role of which is to act as a barrier to the sprawl of large built-up areas and maintain gaps between Surrey towns. The Strategic Area assessment concluded that amendments to boundaries should be considered carefully in the context of particularly narrow gaps between settlements, but it is not felt that Local Area 20 plays a critical role in relation to these gaps or would compromise the ability of the wider Area to maintain the gap between Cobham / Oxshott and Hersham.

Recommendation: Local Area 20 performs weakly against the NPPF purposes and could be considered further.

6.1.5 Local Areas 36 and 37

Local Areas 36 and 37 are directly adjacent and share very similar characteristics, both meeting the Green Belt purposes particularly weakly. Given their scale, location and character, it is considered that they should be considered together as a cluster. Both Local Areas are almost completely enclosed within the Hersham / Walton-on-Thames / Weybridge large built-up area with very little linkage to the wider Green Belt to the south, making little discernable contribution to the prevention of the outward sprawl of the urban area. They make no contribution to any gaps between settlements (Purpose 2) and could not be considered 'countryside' on account of their very small scale, proliferation of existing encroachment at their fringes and relationship with the urban area which envelops them. They therefore play almost no role in preventing encroachment, meeting Purpose 3 weakly.

Local Areas 36 and 37 are part of Strategic Area B. If removed, they would not compromise the ability of this wider Area to prevent the coalescence of settlements and, as noted in the Strategic Assessment, areas of Green Belt which already contain development would be less sensitive to change.

Recommendation: Local Areas 36 and 37 perform weakly against the NPPF purposes and could be considered further.

6.1.6 Local Area **50**

Local Area 50 is one of a series of islands in this part of the River Thames and its tributaries. It has a strong relationship with the Walton-on-Thames / Weybridge / Hersham large built-up area, which envelops the parcel to the north, east and south, whilst linkage westwards to the wider Green Belt is limited, reduced further by existing development on other islands. The parcel therefore makes little contribution to preventing the outward sprawl of the large built-up area and meets Purpose 1 weakly. The Local Area makes no contribution to any gaps between settlements, therefore does not meet Purpose 2, and contains a number of residential developments which give it a semi-urban character, thus meeting Purpose 3 weakly.

Local Area 50 is part of Strategic Area B. If removed, it would not compromise the ability of this wider Area to prevent the coalescence of settlements and, as noted in the Strategic Assessment, areas of Green Belt which already contain development would be less sensitive to change.

Recommendation: Local Areas 50 performs weakly against the NPPF purposes and could be considered further.

6.1.7 Local Areas 51 and 53

Local Areas 51 and 53 are directly adjacent and share very similar characteristics, both meeting Green Belt purposes particularly weakly. They should be considered together as a cluster. Both Local Areas are enclosed by the Walton-on-Thames / Weybridge / Hersham large built-up area, with a very weak relationship with the wider Green Belt to the north. Local Area 51 is severed from the Green Belt by the A3050, while Broad Way separates Local Area 53 from the wider Green Belt beyond. Both make only a very minor contribution to the prevention of outward sprawl of the large built-up area. Neither Local Area meet Purpose 2, given they are both within the existing settlement footprint and make no contribution to any gap between settlements, whilst neither could be reasonably described as 'countryside'. Local Area 51 is an urban park with no relationship to the countryside, whilst Local Area 53 which is a Registered Park and Garden consists of a large hotel and its grounds, encompassing car parks and a golf course. Thus, they both meet Purpose 3 weakly.

Local Areas 51 and 53 are part of Strategic Area B, the primary role of which is to act as a barrier to the sprawl of large built-up areas and maintain gaps between Surrey towns. As a result of their severance from the wider Green Belt and effective enclosure within the large built-up area, it is not felt that either of these Local Areas play any role at the strategic level. Furthermore, as noted in the Strategic Assessment, areas of Green Belt which already contain development would be less sensitive to change.

Recommendation: Local Areas 51 and 53 perform weakly against the NPPF purposes and could be considered further.

6.1.8 Local Area **58**

Local Area 58 scores weakly across all purposes. The parcel is enclosed within the large built-up area of Greater London, with the Kingston bypass (A309) severing it from the wider Green Belt to the south, thus it contributes very weakly to Purpose 1. With regards to Purpose 2, the parcel makes only a very limited contribution to the overall gap between Long Ditton (part of the Greater London built-up area) and Claygate, with little risk that development would cause physical or visual coalescence of the settlements. The A309 to the south diminishes this role further. The Local Area meets Purpose 3 weakly as a result of its fragmented and piecemeal configuration and previous encroachment.

Local Area 58 is part of Strategic Area A. The key role of this Strategic Area is to check the sprawl of Greater London and prevent the coalescence of London with neighbouring towns. It is not felt that this Local Area contributes to either of these purposes strategically and sits as a standalone parcel of land, severed from the wider Green Belt to the south which meets these purposes strongly. The Local Area has already suffered encroachment and is disconnected from the wider countryside. Thus, in line with the overall sensitivity of this Strategic Area to

change, there is a sense that change could be accommodated without causing any further harm to the wider integrity of the Green Belt.

Recommendation: Local Area 58 performs weakly against the NPPF purposes and could be considered further.

6.1.9 Local Areas 70, 72b, 74 and 77

Local Areas 70 and 77 score weakly across all purposes, contributing very weakly towards the prevention of sprawl (they are enclosed within the large built-up area of Greater London and have very weak links to the wider Green Belt), displaying semi-urban characteristics and making no discernable contribution to gaps between settlements. These parcels therefore warrant further consideration in further detailed Green Belt Boundary Review work.

Local Areas 72b and 77 are intrinsically linked to Local Areas 70 and 77; they lie directly adjacent, share largely similar characteristics and are of a similar small scale. While they score moderately against Green Belt purposes, the complexities of linear infrastructure and other physical features in this part of the Green Belt mean that all four of these Local Areas should be reviewed in more detail as a single cluster.

These Local Areas are all part of Strategic Area A. The key role of this Strategic Area is to check the sprawl of Greater London and prevent the coalescence of London with neighbouring towns. This cluster of Local Areas is effectively contained within the existing footprint of Greater London, which extends as far west as the River Ember. Furthermore, it has already suffered encroachment and has relatively weak linkage to the wider countryside. As a result, in line with the overall sensitivity of this Strategic Area to change, there is a sense that change could be accommodated without causing any further harm to the wider integrity of the Green Belt.

Recommendation: Local Areas 70 and 77 perform weakly against the NPPF purposes and, together with the adjacent Local Areas 72b and 74, could be considered further.

6.1.10 Local Areas 71 and 73

Local Area 71 scores weakly against all purposes. The small strip of land southeast of the River Thames is effectively enclosed within the large built-up area of Walton-on-Thames / Weybridge / Hersham, thus contributing very weakly to Purpose 1. The land parcel makes no discernable contribution to the separation of settlements (Purpose 2) and has an inherently semi-urban character with almost no interaction with the wider countryside (Purpose 3). Furthermore, the existing boundary between the land parcel and Walton-on-Thames is largely illogical and weak, cutting across open space and through the gardens of residential properties. The River Thames would form a more readily recognisable and permanent boundary here.

Local Area 73 is directly adjacent to Local Area 71, being located on the opposite bank of the River Thames. Although it scores moderately against the purposes, as

a result of the complex relationship between the Borough boundary and the Thames in this area, as well as the strong visual connection between this land parcel and Local Area 71, it is felt that there would be value in examining these two Local Areas as a single cluster.

The cluster of Local Areas is part of Strategic Area B. If removed, it would not compromise the ability of this wider Area to preventing the coalescence of settlements. Furthermore, it is noted in the Strategic Assessment that areas of Green Belt which already contain development would be less sensitive to change. These Local Areas have suffered encroachment and are more intrinsically tied with the settlement than the countryside, thus it is felt that they would not harm the overall strength of the Green Belt.

Recommendation: Local Area 71 performs weakly against the NPPF purposes and, together with the adjacent Local Area 73, could be considered further.

6.2 Areas for Potential Sub-Division

The following Local Areas should be considered for sub-division into smaller areas that warrant further consideration in future work.

6.2.1 Local Area 24

Local Area 24 does not score against Purposes 1 or 2, but scores moderately against Purpose 3. Together with Local Area 17 to the west, it maintains the openness of an extensive swathe of dense woodland (Oxshott Heath), preventing the encroachment of development into this area. However, it is noted that a very small, isolated area to the south-east of the New Guildford railway line is effectively severed from the wider Green Belt. It is effectively enveloped by residential development and has a much stronger visual and functional relationship with the urban area of Oxshott than the countryside. It would therefore play no role in preventing encroachment if considered separately.

Local Area 24 is part of Strategic Area B, the main roles of which are to prevent sprawl and maintain the gaps between Surrey towns. As a whole, the Local Area makes little or no contribution to either of these functions.

Recommendation: Local Area 24 scores moderately against the NPPF purposes, but there is clear scope for sub-division; the south-eastern corner, which may score less strongly, could be considered further.

6.2.2 Local Area 25

Local Area 25 is a unique area of Green Belt within Elmbridge. Although the land parcel scores strongly against Purposes 1 and 2, forming the final piece of Green Belt preventing the coalescence of Weybridge and Byfleet and checking the sprawl of two large built-up areas which closely abut it, it is effectively urbanised, with significant areas of built-form in the north around Mercedes-Benz and the Brooklands Hotel. Although the test track which takes up most of the northern part of the Local Area maintains a feeling of openness, the function of the land parcel and the surrounding context, with industrial uses to the west and offices

directly to the east, contribute to a strong sense of urbanity which is not generally associated with Green Belt; the Local Area fails to meet Purpose 3 as it has already been encroached upon. Furthermore, it could be said that the two settlements have already coalesced, though it is recognised that the parcel plays an important role in preventing an even greater sense of coalescence in perceptual terms.

In terms of its relationship with Strategic Area B, Local Area 25 is strategically important to the wider Green Belt. If removed, there is potential for the integrity of the wider Green Belt network to be harmed as the strategic link to land to the north in Runnymede and also to the south (east of Byfleet) would be threatened. The primary role of this Strategic Area is to act as a barrier to the sprawl of large built-up areas and maintain gaps between Surrey towns, both of which the Local Area plays a role in, strategically and in terms of the finer grain.

It is recognised that there are two distinct areas of the parcel: the northern, more urban part around the Mercedes-Benz track; and the area south of Wellington Way which maintains a greater level of openness and stronger linkage to the wider Green Belt. There may be scope to examine the area north of Wellington Way separately in greater detail in further Green Belt Boundary Review work, though consideration should be given to the strategic role that this land plays.

Recommendation: Local Area 25 scores strongly against the NPPF purposes, but there is clear scope for sub-division; the northern half, which may score less strongly, could be considered further.

6.2.3 Local Area **62**

While considered in its entirety the Local Area meets Purposes 1-3 moderately, it was noted that the south of the parcel directly adjacent to Lower Green displays different characteristics to the wider area and could be sub-divided to form one or more new land parcels. It is thought that, as a result of encroachment into open land at the edge of the urban area (including the new Cranmere School), strong enclosure and weak connectivity to the wider countryside, these areas may score more weakly if considered separately.

Any further analysis in this part of the Green Belt should pay close consideration to the broader role that this land plays as part of Strategic Area A, the primary role of which is to prevent the sprawl of Greater London and restrict its coalescence with surrounding towns.

Recommendation: Local Area 62 scores moderately against the NPPF purposes, but there is clear scope for sub-division; the southern area, which may score less strongly, could be considered further.

6.2.4 Local Area 66

Local Area 66 forms part of a network of small parcels which collectively form the final open gap between the built-up area of Greater London and Esher, preventing Greater London's outward sprawl and the coalescence of the settlements. However, it is felt that the eastern part of the Local Area plays a

lesser role, given it is almost completely enclosed by built form with only a narrow link to the wider Green Belt. Weston Green and the Old Cranleighan Club are open but display semi-urban characteristics, with little sense of linkage to the wider countryside and an urban context. In contrast, the south-western area has strong linkage to Littleworth Common and the wider network of green spaces which constitute this area of Green Belt. As a result, it is felt that there is merit in sub-dividing this parcel to consider in more detail the role of the eastern part of the Local Area. It is considered that this sub-area may score more weakly if considered alone.

Local Area 66 is part of Strategic Area A, whose primary role is to check the sprawl of Greater London and prevent the coalescence of Greater London with neighbouring towns. The eastern area of the parcel is contained within the existing footprint of Greater London and has a semi-urban character with relatively weak linkage to the wider countryside. As a result, in line with the overall sensitivity of this Strategic Area to change, there is a sense that change could be accommodated without causing any further harm to the wider integrity of the Green Belt.

Recommendation: Local Area 66 scores moderately against the purposes, but there is clear scope for sub-division; the eastern area, which may score less strongly, could be considered further.

6.2.5 Local Area 75a

Considered as a whole, the important role of Local Area 75a in preventing the outward sprawl of both Greater London and Walton-on-Thames / Weybridge / Hersham (Purpose 1) is recognised, as well as its role in terms of Purpose 2 and lesser role in relation to preventing encroachment (Purpose 3). However, it was noted in the Local Assessment that there may be scope for development in the parcel without settlements coalescing. In particular, the western part of the Local Area consists of areas which are more closely associated with the edge of Walton-on-Thames than the wider countryside beyond, with a strong sense of enclosure within the built-up area to the west of Waterside Drive. The BP Terminal in the far western extent of the Local Area are a further urbanising influence. It is considered that this part of the Local Area may score more weakly against the purposes if considered separately.

Local Area 75a overlaps Strategic Areas A and B and fulfils roles prevalent in both, checking the outward sprawl of both London and Walton-on-Thames / Weybridge / Hersham, as well as preventing the coalescence of the settlements. Further work should consider the extent to which the identified sub-area contributes to this purpose, given it displays urban characteristics and a high degree of enclosure within the settlement footprint.

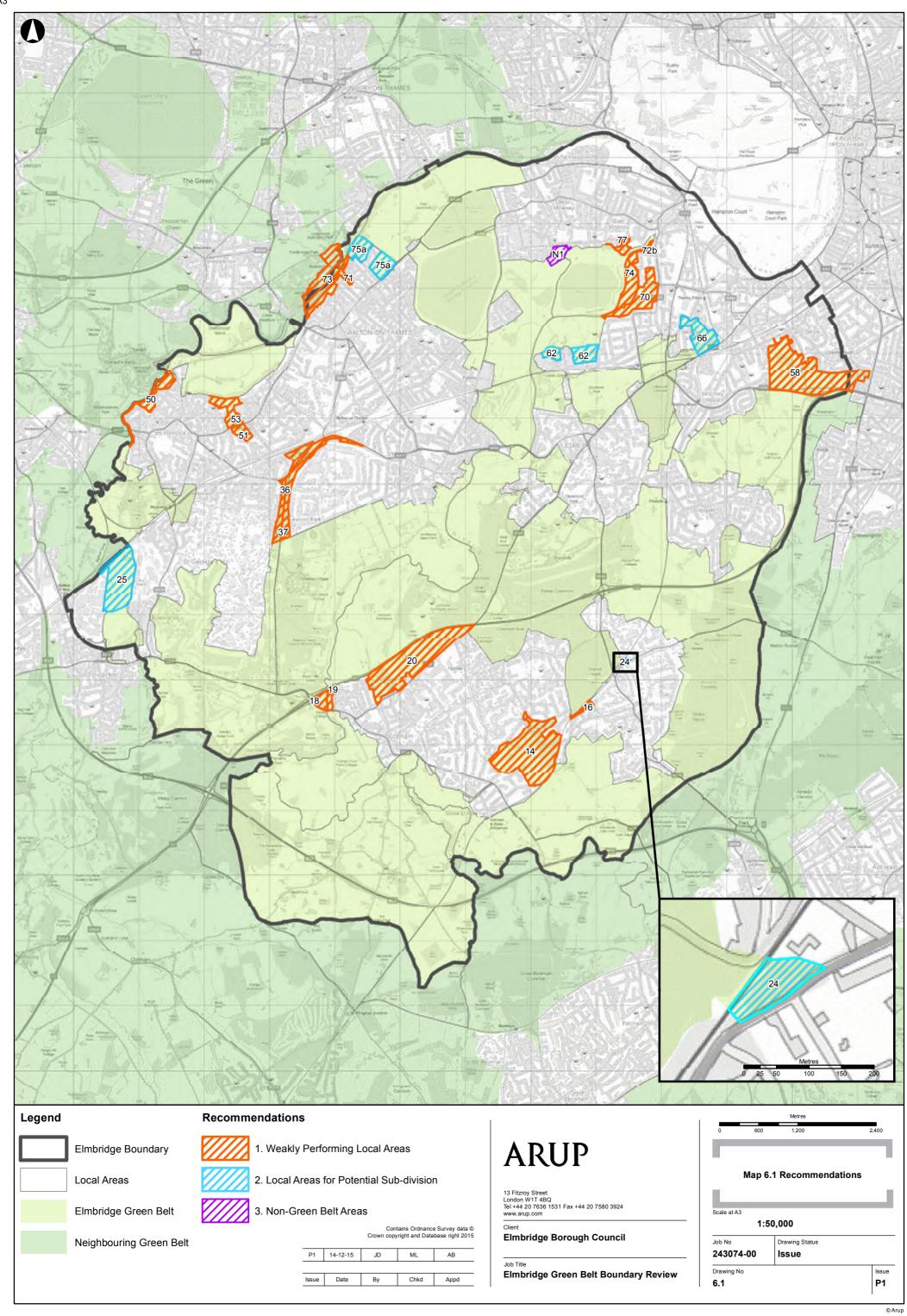
Recommendation: Local Area 75a scores strongly against the NPPF purposes, but there is clear scope for sub-division; the western area, which may score less strongly, could be considered further.

6.3 Non-Green Belt Areas

6.3.1 Non-Green Belt Local Area N1

Non-Green Belt Local Area N1 displays similar characteristics to the Green Belt further south (Local Area 59a) and there is no readily recognisable boundary feature currently separating these two areas. If designated Green Belt, Local Area N1 would strengthen the ability of the Green Belt to check the outward sprawl of Greater London (Molesey) by providing a more robust boundary, and prevent encroachment into open countryside. However, the parcel is very small in scale and not deemed integral to maintaining the openness and permanence of the Green Belt. The Dead River may provide an alternative boundary, but further work should be undertaken to ascertain the strength of this compared to the existing boundary.

Recommendation: Non-Green Belt Local Area N1 performs some functions of Green Belt and could be considered further.



6.4 Boundary Anomalies

As part of this review, minor boundary anomalies have been considered. These are sections of the Green Belt boundary adjoining settlements where the boundary does not follow a readily recognisable physical feature, or where the boundary is not durable. Such instances are identified in Table 6.1 below, with potential new boundaries illustrated in the accompanying maps.

Table 6.1 Identified Boundary Anomalies with Suggested New Boundaries

Local Area	Commentary	Мар
9	The north-eastern boundary of Local Area 9 at the edge of Cobham includes a linear area of grass verge along Tilt Road, as well as part of Tilt Common. This would appear to be an erroneous inclusion in the Green Belt. It is proposed that the Green Belt boundary instead cuts north-west at the entrance to the cemetery, excluding the narrow strip of Green Belt along Tilt Road, before continuing west and then north along the edge of Tilt Road. At the junction between Tilt Road and Elm Grove Road, it is proposed that the boundary cuts west, following the boundary of residential gardens and then north along the western edge of Tilt Common. This will remove an area of land from the Green Belt.	
12	A small anomaly has been identified to the east of Birds Hill Drive, where the Green Belt cuts through residential gardens. It is proposed that the boundary is realigned to the rear of these gardens, removing a small area of land from the Green Belt.	

Local **Commentary** Map Area 22 (1) In the south-west of Local Area 22, the Green Belt boundary cuts across open land in the grounds of a large house. It is suggested that the boundary is realigned to follow the dense planting buffer at the southern edge of the property, before cutting east around the edge of a further dwelling and its garden, removing a small area of Green Belt. This feature is readily recognisable and more likely to be permanent. (2) At the far north-east of Local Area 22, the boundary cuts through a building. It is suggested that the boundary be redrawn to align it with a defined planting buffer to the south of the property, East Road and Burwood Road, adding a small area of land to the Green Belt. These features are readily recognisable and more likely to be permanent. 65/66 A very minor anomaly has been identified in the north-east of Local Area 65 / far north-west of Local Area 66 where the Green Belt boundary cuts through a number of buildings. It is suggested that the boundary is realigned to the edge of these boundaries, removing a very small area from the Green Belt.

7 Conclusion

This review has examined the performance of the Green Belt in and around Elmbridge against the Green Belt Purposes, as set out in the NPPF. The analysis was undertaken at two scales:

- Strategic Areas three broad areas of Green Belt which form part of a wider Green Belt network, stretching into surrounding boroughs and districts, and beyond; and
- Local Areas 78 smaller land parcels within the Green Belt bounded by readily recognisable, durable physical features.

Additionally, two non-Green Belt Local Areas, the Borough's remaining reserve housing sites, were also assessed against the Purposes.

Following a sustained period of urban growth in the area during the late 19th and early 20th centuries, fuelled by the opening of the railways and the rapid outward expansion of London, the Green Belt in Elmbridge, first established in 1957, has played an important role in checking the further sprawl of London and preventing the coalescence of distinct settlements. For the Strategic Assessment, three distinct areas of Green Belt were identified within Elmbridge, each performing its own unique role and function.

While the Green Belt closest to London (Strategic Area A) was found to be part of a fragmented network, its role in preventing the outward sprawl of the metropolitan area and its coalescence with surrounding towns was deemed particularly important. The next band of Green Belt moving outwards from London (Strategic Area B) is more coherent, acting as a barrier to the sprawl of large built-up areas in Surrey and other surrounding counties, as well as preventing towns from coalescing. The Green Belt furthest from London at the southern fringe of Elmbridge (Strategic Area C) primarily prevents encroachment into more extensive, unbroken areas of open countryside.

Considering the Green Belt at a smaller scale (Local Areas), the Green Belt in its entirety meets one or more of the NPPF purposes, although the degree to which different parts of the Green Belt contribute to the individual purposes varies across the Borough. Several areas of the Green Belt were noted as performing weakly against the NPPF purposes, whilst in a smaller number of areas, scope was identified to sub-divide Local Areas further still to focus on areas which are likely to perform less strongly if considered separately, under the premise that suitable defensible boundary features can be identified to enclose such areas. Local Areas, clusters of Local Areas and sub-sections of Local Areas were identified for further consideration.

The identified areas are distributed throughout Elmbridge, but generally consist of distinct areas of Green Belt which are small in scale, possessing semi-urban characteristics and located adjacent to or even enclosed within urban areas, thus performing little or no role in preventing the outward sprawl of large built-up areas, the coalescence of settlements or encroachment into the countryside. The identified areas were also considered in the context of the Strategic Assessment, looking at their role in maintaining the integrity of the wider Green Belt.

In addition to identifying weakly performing Green Belt, this study has also considered whether there is any land currently outside the Green Belt which would benefit from a Green Belt designation. In practice, the land that falls within this category corresponded to two reserve housing sites. Assessment of these Non-Green Belt Local Areas against the NPPF purposes suggests there is one land parcel which would merit further consideration as to whether a Green Belt boundary adjustment would be appropriate.

Finally, a small number of boundary anomalies were identified during the course of the review, with suggested corrections put forward for consideration by the Council. These will ensure the continued robustness and durability of the Green Belt boundary in Elmbridge going forward.

It is important to note that the recommendations set out in this report will not automatically lead to the release of land from the Green Belt or the designation of new Green Belt. Ensuring maximum protection for the Green Belt, in line with national policy, should continue to be a core planning principle in the formulation of Local Plan policy. The areas identified through this review as warranting further consideration will need to be subject to more detailed assessment in the next phase of the Green Belt Boundary Review, to determine the appropriateness and feasibility of adjustments to the Green Belt boundary. Following this work, further decision making by the Council in updating the Local Plan will determine, which areas, if any might be released from or added to the Green Belt. The Green Belt Boundary Review will ultimately sit as part of a suite of evidence, particularly alongside the Strategic Housing Market Assessment and a Review of Constraints, which will be used to inform future plan making.

The Council will also need to careful consider whether, in accordance with the NPPF, whether there are any 'exceptional circumstances' that justify the Green Belt boundary in Elmbridge Borough to be altered through the preparation of the Elmbridge Local Plan. This will apply equally to any proposed additions are subtractions to land designated Green Belt. At that time, the Council will need to consider the Green Belt boundary having regard to their intended permanence in the long term, so that any proposed boundaries are capable of enduring beyond the plan period.

Appendix A

Glossary of Terms

Term	Definition
Connected	Displaying a low level of containment and rather simply adjoining the urban area.
Contiguous	Predominantly surrounded or enclosed by built form but also retaining a strong link to the wider Green Belt.
Duty to Cooperate	A legislative requirement in the Localism Act 2011 which places a duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.
Enclosed	Almost entirely contained or surrounded by built development.
Encroachment	A gradual advancement of urbanising influences through physical development or land use change.
Essential Gap	A gap between settlements where development would significantly reduce the perceived or actual distance between them.
Large Built-Up Area	Areas defined to correspond to the major settlements identified in the respective Local Plans for each local authority, both within and outside Elmbridge, and used in the NPPF Purpose 1 assessment.
Largely Rural Character	Land with a general absence of built development, largely characterised by rural land uses and landscapes but with some other sporadic developments and man-made structures.
Less Essential Gap	A gap between settlements where development is likely to be possible without any risk of coalescence between them.
Local Area	Green Belt land parcel defined by permanent and defensible boundaries, for use during the Local Green Belt Area Assessment.
Local Green Belt Area Assessment	Assessment of Local Areas against NPPF purposes for Green Belt.
Neighbouring Town	Refers to settlements within Elmbridge, as well as settlements in neighbouring authorities immediately adjacent to Elmbridge's boundaries, for the assessment against NPPF Purpose 2.
Open Land	Open land refers to land that is lacking in built development.
Openness	Openness refers to the extent to which Green Belt land could be considered open from an absence of built development.
Semi-Urban Character	Land which begins on the edge of the fully built up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
Sprawl	The outward spread of a large built-up area at its periphery in a sporadic, dispersed or irregular way.

Term	Definition
Strategic Areas	Broad areas of Green Belt, extending beyond the boundaries of Elmbridge Borough Council, for consideration as part of the Strategic Green Belt Area Assessment.
Strategic Green Belt Area Assessment	Assessment of Elmbridge Green Belt as part of wider Metropolitan Green Belt, together with consideration of the functional role of the Strategic Green Belt Areas within the Borough.
Strong Unspoilt Rural Character	Land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.
Urban Character	Land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.
Wider Gap	A gap between settlements where limited development may be possible without coalescence between them.

Appendix B

Pro-Forma: Strategic Green Belt Area Assessment

Strategic	
Area	
Location	
Map	
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C-hl	
Sub-regional	
Context	
Elmbridge	
Elmbridge Context	
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Elmbridge Context Character	
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Summary	
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Sensitivity to	
Sensitivity to Change	
Sensitivity to Change	

Appendix C

Pro-Forma: Local Green Belt Area Assessment

Local Area Area (ha) Location Plan	
Area (ha)	
Location Plan	
Strategic Area	
Summary	

Purpose	Criteria	Assessment	Score
(1) To check the	(a) Land parcel is at		
unrestricted	the edge of one or		
sprawl of large	more distinct large		
built-up areas	built-up areas.		
•	(b) Prevents the		
	outward sprawl of a		
	large built-up area		
	into open land, and		
	serves as a barrier at		
	the edge of a large		
	built-up area in the		
	absence of another		
	durable boundary.		
Purpose 1: Total	Score		X/5
(2) To prevent	Prevents development		
neighbouring	that would result in		
towns from	merging of or		
merging	significant erosion of		
	gap between		
	neighbouring		
	settlements, including		
	ribbon development		
	along transport		
	corridors that link		
	settlements.		
Purpose 2: Total	Score		X/5
(3) Assist in	Protects the openness		
safeguarding the	of the countryside and		
countryside	is least covered by		
from	development.		
encroachment			
Purpose 3: Total	Score		X/5

Photograph(s)	
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