

Spelthorne Borough Council

**Spelthorne Green Belt Assessment  
Stage 2**

**Draft Methodology**

Report Ref

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Draft

This report takes into account the particular instructions and requirements of our client.

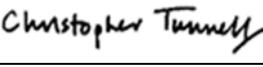
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# 1 Introduction

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Arup has been appointed by Spelthorne Borough Council (SBC) to undertake a Stage 2 Green Belt Assessment (GBA Stage 2). This Study advances the Stage 1 Green Belt Assessment (GBA) undertaken by Arup in 2017, and will form part of the evidence base to support the Spelthorne Local Plan 2020-2035.

The intention of this more refined and focussed assessment is to complement the conclusions formed in the GBA, and to ensure that SBC has made every effort to identify appropriate land to meet identified needs. This note sets out the proposed approach for the GBA Stage 2.

## Site Selection Considerations

The assessment will not be a policy or decision-making document that proposes any release of Green Belt land but it will be an important part of SBC's evidence base. It is not within the remit of the GBA Stage 2 to consider 'exceptional circumstances' arguments, which would be necessary to justify the release of land from the Green Belt. It will fall to SBC to further assess the sustainability and delivery of areas of land assessed through the GBA Stage 2 assessment, as appropriate, as part of the wider plan-making process.

Green Belt will not be the only consideration when assessing the suitability and deliverability of sites identified for allocation in Spelthorne. SBC will not be precluded from allocating sites for development that are assessed as being highly performing Green Belt if other factors in favour of the site outweigh this consideration.

## 2 Context

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### 2.1 Overview

The purpose of a Green Belt Assessment is to provide evidence of how different areas perform against the Green Belt purposes, as 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.

Spelthorne GBA set out the relevant national and local policy framework for undertaking such an assessment, as well as relevant guidance and good practice identified elsewhere. This has not been repeated here; however, it continues to shape the methodology for this Stage 2 Assessment. This section therefore provides an update on policy, guidance and experience elsewhere since the initial assessment was undertaken.

### 2.2 Policy and Guidance

#### 2.2.1 National Planning Policy Framework

Since the GBA, changes have been proposed to national planning policy. On 5th March 2018, the Government published the draft revision of the National Planning Policy Framework (NPPF) for consultation. The final publication of the revised NPPF expected in summer 2018.

The draft NPPF generally strengthens Green Belt policy, in particular around the production or review of local plans, to ensure the redevelopment of brownfield land is maximised and density of development is optimised before amendments to Green Belt boundaries are considered. It should be noted that most policies relating to Green Belt remain unchanged, i.e.: the overarching aim, the five purposes, the intended permanence of the Green Belt, the need to take into account sustainable patterns of development, alterations only to be undertaken in exceptional circumstances and the need for positive planning in the use of Green Belt land.

Within the Draft NPPF, the Green Belt chapter includes changes that relate to the process of amending Green Belt boundaries through local plans. The key changes are:

- **‘Exceptional circumstances’:** Paragraphs 135-136 outline that Green Belt boundaries should only be altered in exceptional circumstances, after the strategic plan-making authority have examined fully all other reasonable options for meeting its identified need. The term ‘reasonable options’ has been summarised as making use of brownfield sites, optimising density of development focusing on centres and other locations well served by public transport, and demonstrating discussion with neighbouring authorities.
- **Prioritising area for release:** Paragraph 137 outlines that, when it has been concluded that Green Belt release is required, land which has been previously



aspect is a characteristic quality of the countryside, and “safeguarding the countryside from encroachment” includes preservation of that quality of openness. The preservation of “the setting ... of historic towns” obviously refers in a material way to their visual setting, for instance when seen from a distance across open fields<sup>3</sup>.

Appeal cases in Three Rivers<sup>4</sup> and Cheshire West and Chester<sup>5</sup> further highlight the need to carefully consider ‘openness’. In the former case, the Inspector concluded the proposal for three dwellings should be allowed as it constituted limited infill development in a village and as appropriate Green Belt development, the impact of the proposal on openness did not need to be assessed; however, that being said, the Inspector concluded that, regardless, any possible impact on openness would be offset by the removal of an existing structure with a similar footprint to the proposed development.

“I therefore conclude that the proposal would constitute limited infill within a village and would therefore not be inappropriate development within the Green Belt. Accordingly, there is no need to examine if very special circumstances exist to outweigh any harm arising from inappropriateness. ...

In view of my finding that the proposal is not inappropriate development, the impact on openness does not fall to be formally considered, but the impact of proposal on the openness of the Green Belt would be offset to a large degree by the removal of the barn that has a similar footprint to the proposed houses.”

The case in Cheshire concerned plans for a new home to be developed on previously developed Green Belt land. The site concerned was a builder’s yard on the edge of washed-over village. The Inspector concluded that it could not be considered infill development, given that it was widely spaced from neighbouring houses and has frontages onto different roads. Further the development would urbanise the site and its surroundings, thereby diminishing the openness of Green Belt. The appeal was accordingly dismissed.

“Indeed, in line with the 2016 *Turner v Secretary of State and East Dorset Council* judgement the concept of openness should not be limited to a volumetric approach comparing the size, mass and physical effect of openness before and after development. Such an approach would be far too simplistic and ignore the wider aspects of openness which goes beyond the physical effect of buildings or structures. Factors relevant include how built up the Green Belt is now and how built up would it be after development has taken place. Consequently, although it may be accepted that the proposal to redevelop a brownfield site may result in a reduced volume and footprint compared to the buildings and structures currently in place, there are wider factors that must be taken into account in defining the effect of the proposal on openness.

In assessing the matter of openness there are a number of ways of determining whether there would be encroachment into the Green Belt. The effect of development as encroachment on the countryside may be in the form of loss of openness or intrusion. The Framework identifies that openness is an essential characteristic of the Green Belt.”

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<sup>3</sup> *Turner v Secretary of State CLG and East Dorset Council (2016) EWHC 2728 (Admin)*

<sup>4</sup> The Planning Inspectorate (2018) *Appeal Ref: APP / P1940/W/17/3183388 – Clovercourt Ltd v Three Rivers District Council*

<sup>5</sup> The Planning Inspectorate (2018) *Appeal Ref: APP/ A0665/ W/ 17/ 3190601 – Clegg v Cheshire West & Chester Council*

The Secretary of State approved plans to build a replacement secondary school and new homes on Green Belt land east of Guildford, after ruling that ‘very special circumstances’ had been demonstrated<sup>6</sup>. He agreed with the Inspector that the scheme represented a significant development in the Green Belt which would, inevitably and significantly reduce its openness and would erode the open context of the village. Noting the substantial harm to the Green Belt, he ruled that the provision of new housing and a new school carried greater weight.

The Inspector’s note<sup>7</sup> for this appeal highlighted some key considerations in relation to Green Belt, which are relevant to this assessment:

- The two essential attributes of the Green Belt are its permanence and openness, in line with NPPF (paragraph 79).
- The key element to assess is the effect that a development has on the openness of the Green Belt.
- The “*concept of ‘openness’ is generally considered to be land being free from built development.*”
- Although openness should be assessed on an individual site / area basis, the cumulative impact on the Green Belt of development on adjacent sites / areas should be considered.

## Local Plan Examinations

Issues relating to Green Belt Assessment highlighted at recent Local Plan Examinations, include:

- Welwyn Hatfield (2017)<sup>8</sup>: The Inspector stressed the need to ensure sufficient granularity in identifying land parcels in a Stage 2 Assessment; the importance of assessing openness as opposed to landscape; the need for assessments to consider local circumstances when determining essential areas to retain and preserving settlement gaps; queried whether local considerations, if used, should be accorded the same weight as the NPPF Purposes; and advocated that it is pointless to carry out Green Belt Assessment for sites affected by major policy constraints.

[The Local Plan development strategy is not sound], “in part because there was insufficient justification for the failure to identify sufficient developable sites within the Green Belt. This is largely because the phase 1 Green Belt Review was at such a strategic level as to render its findings on the extent of the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas. .... Additionally, the phase 2 Green Belt Review, which did look at a finer

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<sup>6</sup> Ministry of Housing, Communities and Local Government, Secretary of State (2018) *Town and Country Planning Act 1990 – Section 78 Appeal Made by Berkley Homes (Southern) Ltd And The Howard Partnership Trust*

<sup>7</sup> The Planning Inspectorate (2017) *Report to the Secretary of State for Communities and Local Government, Town and Country Planning Act 1990 Guildford Borough Council Appeal by Berkley Homes (Southern) Ltd and the Howard Partnership Trust*, APP/ Y3615/W/16/3151098

<sup>8</sup> Mel Middleton, Inspector (December 2017) *Welwyn Hatfield Local Plan Examination Green Belt Review*

grain of sites, does not appear to have examined all of the potential development sites adjacent to the urban areas.

Furthermore that study, which combined a more refined examination, of the contribution that sites made to Green Belt purposes, with an overall examination of development considerations, appears to have incorporated an examination of landscape character into the consideration of openness. Openness considerations in a Green Belt context should only be concerned about the absence of built development and other dominant urban influences. They should not be concerned about the character of the landscape.

.....

There must be a limit beyond which the development of undeveloped land between settlements, be they neighbouring towns or nearby smaller settlements, should not proceed. Exactly what that is in terms of distance is debatable and it could well be different in the context of the merging of neighbouring towns to the context of maintaining the settlement pattern. I note that the Council has referred to a kilometre, whereas other studies have used a mile and even five kilometres in the context of neighbouring towns. What is significant however is perception and a kilometre gap with limited development in a landscape of rolling topography, where the settlements are not visible one from the other, is probably more valuable than five kilometres in flat country with more sporadic urban development in between and such that the settlements are clearly visible one from the other.

.....

There are of course sites, which for other purposes are unlikely to ever be developed. I would include the statutory conservation sites, land potentially at risk of flooding, and the major heritage assets in this category but the final choice should be a rational value judgement on the importance of the protection. It nevertheless seems pointless to me to carry out a detailed Green Belt assessment for such sites however they are defined.”

- Redbridge (2018)<sup>9</sup>: The Inspector emphasised that a Green Belt Review should focus on assessing the Green Belt against the NPPF purposes. Where no historic towns exist, it is reasonable to exclude Purpose 4 from an assessment. Further, although Purpose 5 is not particularly useful for evaluating sites, the rationale expressed for leaving out this purpose must be robust.

“The assistance the Green Belt gives to urban regeneration is assumed to be nil because all brownfield sites with reasonable prospects of development have been identified. That view is flawed as a matter of principle because the aims of the Green Belt are long term but as this purpose applies to most land it does not form a particularly useful means of evaluating sites.”

The following Local Plan Examinations do not address Green Belt Assessments per se but nevertheless highlight the sorts of factors that might be considered in developing an exceptional circumstances case and therefore of potential relevance when developing the assessment methodology:

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<sup>9</sup> David Smith, Inspector, (24 January 2018), *Report to the council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030*

- Guildford (2018)<sup>10</sup>: The Inspector highlighted the need to demonstrate strategic level exceptional circumstances to justify the release of Green Belt and also the local level exceptional circumstances for the release of specific sites.
- Vale of White Horse (2016)<sup>11</sup>: The Inspector stated that a revision of the Green Belt boundaries ‘is not inherently unsustainable’ and reiterated that the Ministerial Statement in March 2014, which indicated that unmet housing needs are unlikely to represent the ‘very special circumstances’ necessary to justify inappropriate development in the Green Belt, is not relevant for plan-making. The Inspector accepted that there were sufficient ‘exceptional circumstances’ to justify the release of sites from the Green Belt, taking into consideration total objectively assessed housing need, local housing needs in specific areas, the limited potential for development within existing settlement, tightly drawn Green Belt boundaries, other absolute land constraints, unsustainability of other spatial options and the suitability and deliverability of the sites in question in terms of accessibility to existing settlements and services.
- Birmingham (2016)<sup>12</sup>: In the Plan, the Council proposed two strategic Green Belt releases. In determining whether the ‘exceptional circumstances’ for their release from the Green Belt had been justified, the Inspector noted that both would lead to encroachment into the countryside but judged that this harm would be outweighed by the ‘exceptional, and possibly unique scale’ of unmet housing need in the city, which can only be effectively addressed through amendments to the Green Belt boundary. The Inspector’s conclusion was that even taking consideration of the Council’s approach to site selection, which aimed to prioritise brownfield land and additionally sought to maximise the yield from each site, the scale of unmet need would remain exceptional. The Inspector further noted that the release of these two sites would not “lead to ‘unrestricted sprawl’, and both have defensible boundaries formed by main roads and topographical features.”

## 2.4 Experience Elsewhere

Table 2.1 provides a summary of stage 2 Green Belt assessments undertaken by authorities neighbouring Spelthorne Borough Council, and a brief overview of the methodology taken. While Table 2.2 summarises the approach taken in neighbouring authorities and elsewhere to identify sub-areas for stage 2 Green Belt assessments. Key points to note:

- Consistency of approach between Stage 1 and Stage 2 Green Belt assessments, in terms of assessment criteria.  
Variety of approaches taken to identify sub-areas for Stage 2 assessments.

<sup>10</sup> Jonathan Bore, Inspector (23 March 2018) *Examination of the Guildford Borough Local Plan: Strategy and Sites, Inspector’s Questions and Comments (No.1)*

<sup>11</sup> Malcolm Rivett, Inspector (25 May 2016) *Vale of White Horse Local Plan 20131: Part 1 Examination – Inspector’s Interim Findings.*

<sup>12</sup> Roger Clews (11 March 2016) *Report on the Examination of the Birmingham Development Plan*

**Table 2.1 Summary of Neighbouring Authorities Green Belt Assessment Work**

| Local Authority           | Study   | Status            | Summary of Approach  |
|---------------------------|---|-------------------|--|
| Runnymede Borough Council | Green Belt Review Part 2  | Published in 2017 | The Study assessed all sites promoted for development that were located within indicative buffers around settlements. Promoted sites located outside of the buffers were not included as part of the assessment. The sub-areas were assessed against the purposes of the NPPF, and the role they play in relation to the wider strategic Green Belt. The assessment criteria were broadly the same as those used for the 2014 GBR. Recommendations were then made identifying sub-areas that could be considered for potential release.  |
| Elmbridge Borough Council | Green Belt Review Part 2  | Not yet published | n/a<br>[Conducted by Arup]   |
| Windsor and Maidenhead    | The Edge of Settlement Analysis Part 2: Green Belt Purpose Assessment | Published in 2016 | The Study assessed all land on the edge of those settlements which are themselves excluded from the Green Belt. All areas of land were considered regardless of whether it had been promoted by the landowner. Parcels were identified in line with 'hard constraints' relevant to the borough. Each parcel was assessed against four of the five Green Belt purposes. Recommendations were made as to the level of contribution each parcel makes to the wider Green Belt.<br><br>This approach was broadly comparable with that taken in the Edge of Settlement – Part 1 Green Belt Purpose Assessment (2015) which considered large built up areas excluded from the Green Belt. Part 1 assessed Green Belt against Purposes 1-4 of the NPPF. |
| Slough Borough Council    | n/a   | n/a               | n/a  |
| Hillingdon                | Green Belt Assessment Update  | Published in 2013 | The Study provided an update to the Green Belt review undertaken in 2006, taking account of changes in national planning policy and the additional sites that have been submitted as part of the Local Plan Part 2. The review assessed all representations relating to a proposed change in the Green Belt boundary, received by the Council since the adoption of the Unitary Development Plan in 1998. These were assessed against the purposes defined in the NPPF.  |

| Local Authority | Study                                      | Status            | Summary of Approach  |
|-----------------|--|-------------------|--|
| Hounslow        | Draft Hounslow Green Belt Review (Stage 2) | Published in 2017 | <p>This Study undertook a review of the weaker performing parcels of Green Belt identified in the Part 1 Green Belt Review (2015), and required further consideration. Sites were filtered on the basis of existing and potential uses, and policy constraints. Weaker performing parcels were then reviewed against purposes 1-3 as defined in the NPPF, and recommendations were made regarding the continued designation of land as Green Belt.</p> <p>This approach is broadly comparable to that taken in the Part 1 Green Belt Review. The Study considered all Green Belt land, as well as land outside of the defined urban areas but not within the Green Belt. Green Belt parcels were assessed against purposes 1-3 in the NPPF, and a more detailed appraisal of the qualitative aspects of the sites and their character.</p> |



**Table 2.2 Review of Green Belt Methodologies – Sub-Area Identification**

| Local Authority                   | Date | Approach taken to identifying Sub-Areas   |
|-----------------------------------|------|---|
| Welwyn Hatfield Borough Council   | 2014 | <p>The Welwyn Hatfield Part 2 Study assessed a range of Green Belt sites, including:</p> <ul style="list-style-type: none"> <li>‘Strategic sub-areas’ (as identified in the Part 1 Study)</li> <li>‘Small scale sub-areas’ and areas for ‘Boundary adjustment’ recommended for further assessment in the Part 1 Study</li> <li>Sites identified in the Strategic Housing Land Availability Assessment</li> <li>Sites identified in the Gypsy and Traveller Land Availability Assessment</li> </ul> <p>This approach was however criticised during the Local Plan Examination. Although the Review assessed finer grain sites, it was not considered to fully examine all of the potential development sites adjacent to urban areas.</p>  |
| Runnymede Borough Council         | 2017 | <p>RBC’s spatial strategy is that urban and brownfield sites should be prioritised for development. In line with this spatial strategy, Runnymede Borough Council Green Belt Review Part 2 used indicative fixed buffers around each identified settlement, to indicate the likely maximum extent of sustainable development. In determining an appropriate width of buffer, the Council carried out a literature review of broadly comparable studies elsewhere. The findings from the literature review, along with the conclusions of the centre hierarchy paper, and considerations on the size of the Borough and spacing of settlements, led to a range of buffer widths being tested.</p> <p>Overall, it was decided that a 400m buffer would provide a reasonable zone for the town centres and key service centres. The 250m buffer was considered a reasonable buffer for the local service centres and their surrounding urban areas.</p> <p>These buffers indicated the likely maximum extent of sustainable development, and vary according to the position of the settlement in the centre hierarchy. It was considered that assessing wider buffers would to some extent cause duplication with previous work undertaken, and might encourage unsustainable forms of development away from settlements.</p> <p>The assessment covered the full extent of the buffer, to ensure that sub-areas that were not directly adjacent to the settlement, but still functionally related, were still considered as part of the assessment. Promoted sites located outside of the buffers were excluded from the assessment. The buffers helped to identify ‘in-between’ sites that would logically form sub-areas for assessment.</p> |
| Cheshire East Council             | 2015 | <p>The Green Belt Parcel Assessment provided further detailed assessment on smaller parcels of land:</p> <ul style="list-style-type: none"> <li>- Around settlements either partially or fully inset by the Green Belt, within General Areas identified in the Stage 1 Assessment as providing a ‘contribution’ or ‘no contribution’ to the Green Belt (excluding General Areas that were identified a providing a ‘major’ or ‘significant’ contribution); and</li> <li>- Around all settlements identified as Principle Towns, Key Service Centres and Local Service Centres</li> </ul> <p>Sites included in the Local Plan Strategy (Submission Version), not covered by the above criteria were also assessed but reported separately.</p>   |
| Cheshire West and Chester Council | 2013 | <p>The Stage 2 Green Belt Review re-assessed all of the ten Areas reviewed as part of Stage 1. This formed the starting point to identify resultant land parcels within the 10 Areas, which could potential be released from the Green Belt.</p>  |

| Local Authority                         | Date | Approach taken to identifying Sub-Areas   |
|---|------|---|
| Royal Borough of Windsor and Maidenhead | 2016 | The Edge of Settlement Analysis: Green Belt Purpose Assessment considered all land on the edge of those settlements which are themselves excluded from the Green Belt. To ensure a comprehensive assessment all areas of land were considered regardless of whether it had been promoted by the landowner as being available for development.   |
| Aylesbury Vale District Council         | 2016 | <p>The Aylesbury Vale Green Belt Assessment Part 2 assessed the ‘general areas’ and ‘sub-parcel areas’ that had been identified in Part 1 of the assessment as warranting further consideration for potential removal from the Green Belt, as well as other options the Council were considering for land within the Green Belt.</p> <p>The areas for further consideration included the following:</p> <ul style="list-style-type: none"> <li>- General Areas, which scored weakly overall against the NPPF purposes</li> <li>- Whole General Areas or clusters of General Areas, which performed medium or strongly scoring against the NPPF purposes but have particular characteristics or synergies with neighbouring weaker General Areas</li> <li>- Medium or strongly scoring General Areas where there is clear scope for sub-division to identify weakly performing ‘sub-areas’, including the presence of boundary features which have the potential to be permanent and recognisable</li> <li>- Non-Green Belt General Areas, which could be considered for inclusion in the Green Belt.</li> </ul> |

## 2.5 Implications for this Study

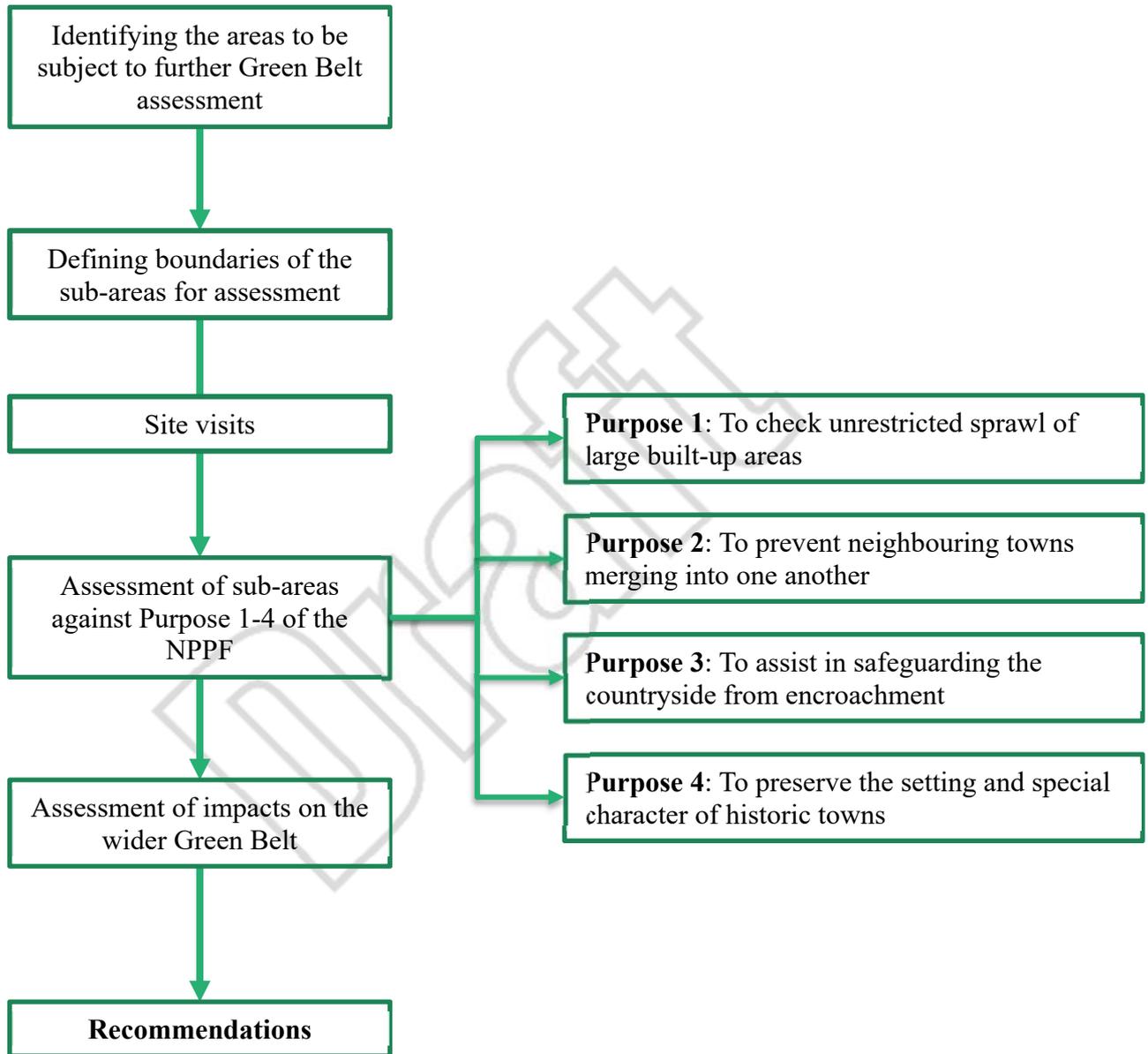
This section has set out the context of emerging national policy, legal cases that draw attention to recent thinking during Local Plan Examinations and planning appeals and experience elsewhere to Green Belt assessment. The implications for this assessment are:

- Openness and permanence are key considerations in terms of Green Belt; and are therefore integral to the assessment of Green Belt across all Purposes.
- Openness should be considered not only in terms of a ‘volumetric approach’ (i.e. physical coverage of built form) but also in terms of ‘visual elements’ (for example, visual linkages between settlements in relation to Purpose 2, or functional character and linkages to the wider Green Belt in relation to Purpose 3).
- Green Belt should be assessed against the Purposes set out in NPPF and, if any purpose is to be excluded, there must be a robust rationale. Any methodology must clearly set out how the Purposes have been interpreted and should respect the local context.
- A thorough approach must be taken to the identification of sub-areas for assessments, particularly where there is a risk that objectively assessed housing need would not be met without amending Green Belt boundaries.
- Detailed Green Belt assessment does not need to be carried out for land covered by major policy constraints, which would preclude development in any case.
- The strategic as well as local Green Belt value should be considered in assessments.
- When assessing whether an area can be removed from the Green Belt, consideration should be given to the presence or otherwise of defensible boundary features.
- There is no defined methodology for carrying out a Stage 2 assessment and local authorities have therefore taken a variety of approaches to-date.
- Evidence from Green Belt assessments should be reviewed in conjunction with broader evidence of the suitability and deliverability to justify ‘exceptional circumstances’ for amendments to the boundaries. Proposed amendments to the Green Belt should be intrinsically linked to a district’s overall spatial strategy and there has to be a degree of certainty over the deliverability of sites to justify the ‘exceptional circumstances’ required to remove them from the Green Belt

### 3 Methodology

This section sets out the methodology for undertaking the GBA Part 2. An overview of the methodology process is summarised in Figure 3.1.

**Figure 3.1 Methodology Diagram**



#### 3.1 Area Identification

As part of the GBA, the entirety of the Green Belt in Spelthorne was assessed against the NPPF purposes. This first assessment stage identified six Local Areas for Potential Sub-Division (LAPS). All of the LAPS will be included in the Stage 2 assessment. Local Areas that were assessed as performing weakly in their entirety in the GBA will not be considered further, as they have already been identified as recommended areas for further consideration by the SBC.

The GBA Stage 2 feeds directly into SBC's site selection process, and it is therefore appropriate to undertake a more spatially focussed piece of work. However, there is no agreed approach to identifying sub-areas for this stage of assessment. We have therefore reviewed experience elsewhere, and considered recent advice from PINS, in developing the methodology (see Section 2). In discussion with SBC, it has been decided that a settlement buffer approach to identifying Sub-Areas will be employed. The rationale is twofold:

- Consistency of approach with neighbouring authorities Runnymede and Elmbridge; and
- Examines all potential sites adjacent to urban areas and therefore represents a robust and thorough assessment.

There is no specific guidance regarding the appropriate buffers to adopt, therefore it is up to the individual authority to define such buffers in accordance with local circumstances taking into account elements such as settlement patterns and gaps, topography, extent of greenbelt etc... In the case of Spelthorne, a relatively small borough in land area, densely developed with relatively small gaps between built up areas and in comparison, to other boroughs relatively modest swathes of greenbelt, a buffer of relatively narrow proportion has been considered appropriate. Therefore, for the purposes of this assessment, the starting point will be to assume a buffer of some 250 m around each settlement. A larger buffer would mean that the buffer zones would coalesce in many areas so that effectively this Stage 2 assessment would be assessing the same as land parcels as assessed in the first greenbelt assessment and therefore lose the degree of granularity that should be associated with a Stage 2 assessment.

The identification of a buffer should not be taken as an indication that this land is necessarily the most sustainable, suitable or deliverable option for any future development. Rather, if the GBA Stage 2 demonstrates the presence of areas of land which perform less strongly against the Green Belt purposes, it will be for SBC to determine as part of wider local plan work as to whether these areas fit with the identified preferred option for growth.

To ensure that the assessment reflects the local context, three processes of refinement will be undertaken, relating to:

- Major 'buffer' features;
- Emerging site selection work;
- Major policy and other constraints.

## Major Buffer Features

Given the primacy given to maintaining the openness of the Green Belt, including its 'visual' openness, as well as the particularly fragile nature of the Green Belt in the Spelthorne context (maintaining a network of narrow tracts of open land between urban areas), the buffer will be refined inwards in some instances to reflect the presence of major visual/physical buffer features in the landscape.

Large waterbodies, including the network of Thames Water reservoirs and other artificial lakes (resulting from minerals workings), cover a significant proportion of the Green Belt in Spelthorne; these often form substantive physical/visual buffers to the outward expansion of the Borough's urban areas, taking into account the substantive embankments surrounding them. Motorways and dual-carriageways also provide significant buffers in a number of instances. In summary, the buffer will be adjusted, where appropriate, to reflect the presence of:

- Local topography (physical and man-made).
- Significant waterbodies (lakes and reservoirs).
- Major roads (dual-carriageways and Motorways).

### Emerging Site Selection Work

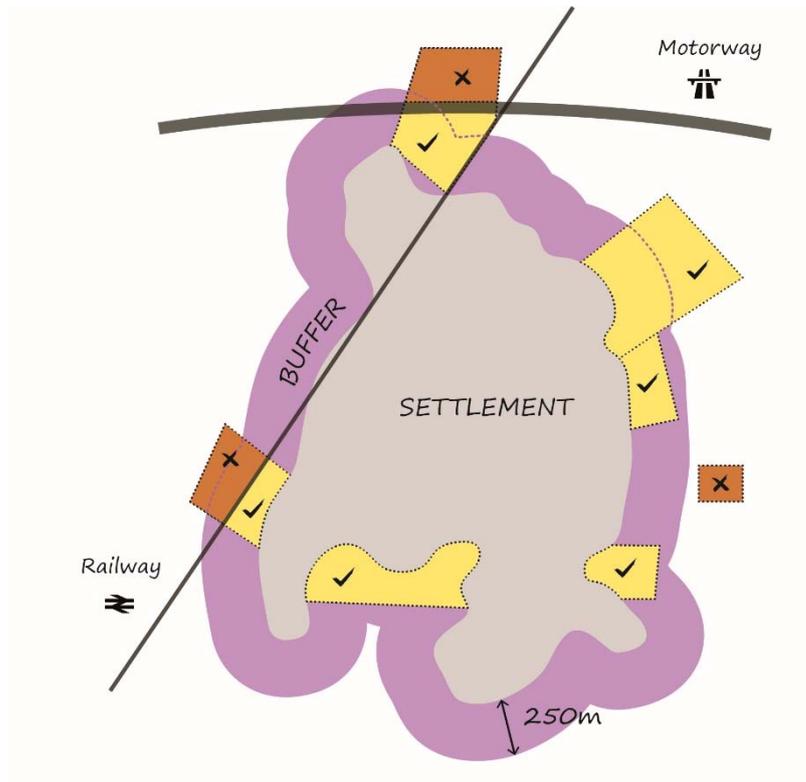
To ensure alignment with emerging site selection work, further consideration will be given to the settlement buffers and sites promoted for development in the 'call for sites'.

The application of buffers means that only those sites falling entirely or partially within the defined buffers will be subject to further assessment, ensuring the Stage 2 assessment remains both focussed and pragmatic.

Where promoted sites are located partially within a settlement buffer, the entirety of these sites will be taken forward for further consideration. Similarly, where a site is located outside of the settlement buffers, but adjoins sites located within the buffer, this site may be included for further assessment as appropriate.

Figure 3.2 demonstrates how this process will be undertaken. The 'x' indicates where promoted sites will not be assessed, with '✓' indicating promoted sites for inclusion within the assessment. Promoted sites partially falling outside of the buffer will still be included in the assessment, unless a permanent man-made or natural boundary feature exists. In some cases, this will result in the expansion of the area for assessment where promoted sites extend beyond the identified buffer areas.

The LAPS will also be reviewed on a similar basis. However, an additional sense check will be undertaken. If they have a close functional or physical relationship with promoted sites, the extent of the areas will be adjusted as necessary.

**Figure 3.2 Assessing Sub-Areas within Indicative Buffers**

### Major Policy and Other Constraints

A filtering process to remove sites, which are entirely or largely constrained by other significant policy constraints will be undertaken, to exclude areas where development is likely to be inappropriate. The ‘major policy constraints’ from the Strategic Land Availability Assessment (SLAA)<sup>13</sup> will be used, i.e.:

- Flood zone 3b (functional floodplain)
- Sites of international and national nature conservation importance
  - Special Protection Area (SPA)
  - Special Areas of Conservation (SAC)
  - Ramsar Sites
  - Sites of Special Scientific Interest (SSSI)
- Public Safety Zone

In addition to these ‘major policy constraints’, and in discussion with SBC, it was agreed that the following areas will also be excluded from assessment:

- Thames Water reservoirs since these are operational water bodies and there has been no indication from Thames Water that this function will cease and

<sup>13</sup> SBC (2015) *Spelthorne Local Plan, Strategic Land Availability Assessment, Methodology*

therefore the land be available for potential release. The excluded reservoir area will be defined as the full extent of the water body plus its embankments.

- Sites in active use for churches, cemeteries and allotments.
- Sites designated as common land.
- Sites identified by SBC as already under development.
- Narrow constrained sites with limited development potential.

Locations affected by these constraints will be mapped using GIS data supplied by SBC, and in the case of the reservoirs, Thames Water; and used to refine definition of the sites.

### 3.2 Defining Sub-Area Boundaries

Given the requirement through paragraph 85 of the NPPF for Green Belt boundaries to be defined ‘*clearly, using physical features that are readily recognisable and likely to be permanent*’, it therefore follows that these sub-areas should be defined, to reflect these principles from the outset.

The process of defining the boundaries of the ‘sub-area’ will be undertaken in line with the general principles used to identify the Local Areas in GBA, however applied on a more flexible basis to reflect the more granular nature of the assessment.

Permanent and defensible boundary features, both man-made and natural, will continue to be used to assess the performance of the Green belt (Table 3.1). Due to the more granular nature of the work, additional boundary features will play a particularly important role in compartmentalising the Green Belt into smaller areas for further assessment.

**Table 3.1 Boundary Features for Identifying Sub-Areas**

| Permanent Man-made and Natural Features | Additional Boundary Features   |
|---|--|
| Motorways                               | Unclassified public and private roads  |
| A and B Roads                           | Smaller water features, including streams, canals and other watercourses         |
| Railways lines                          | Prominent physical features (ridgelines)   |
| River Thames                            | Existing development with strongly established, regular or consistent boundaries |
| River Mole                              | Established and unbroken woodland or hedgerow                                    |
| River Wey Navigation                    |  |
| Reservoirs                              |  |

Sub-area boundaries will initially be defined through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps ‘birds eye’ views and Google Earth. Boundaries will be adjusted as necessary, based on on-site observations during the site visits, to reflect the site characteristics as accurately as possible. This process of refinement will take into account the local context of the sub-area, and will involve an element of

professional judgement. Each sub-area will be assigned a unique reference number.

### 3.3 Site Visits

All sub-areas will be visited to understand their immediate context, character and boundary features. Photographs of all sub-areas will be taken (access permitting) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider Green Belt and adjacent settlements. Pro-formas for each sub-area will record the assessments against each criterion, together with observations from site visits and photographs.

### 3.4 Assessment of Sub-Areas

The assessment process will involve a mixture of evidence from desk-based research, including contextual information and secondary data sources such as aerial photography, Google Streetview, and historic maps. This will be supported by primary evidence obtained through the site visits.

The aim of the assessment is to establish any differentiation in terms of how sub-areas function and fulfil the purposes of the Green belt. The assessment of the sub-areas will be undertaken in two strands:

- Assessment against the NPPF Purposes; and
- Appraisal of role and importance of the sub-area in terms of the function of the wider Green Belt, (taking into consideration the Local Area scores from the GBA).

### 3.5 Assessment against Green Belt Purposes

As part of the methodology for the GBA, four of the five Green Belt purposes were considered. This approach will be maintained for this part of the assessment. As such, each sub-area will be assessed against NPPF Purposes 1-4:

1. **To check the unrestricted sprawl of the 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.**

As with the GBA, no assessment of sub-areas will be undertaken with regard to NPPF Purpose 5: **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.** Assessment against this purpose will not enable a distinction between sub-areas as all Green Belt achieves the purpose. It is difficult to distinguish the individual contribution that a single parcel of land makes to encouraging the re-use of urban land.

As with the GBA, one or more criteria have been developed for each purpose using both qualitative and quantitative measures, and a score out of five will be attributed to each criterion (Table 3.2). For consistency with the GBA, each NPPF

purpose will be considered equally significantly, and therefore no weighting or aggregation of scores across the purposes will be undertaken. As such, a composite judgement will be necessary to determine where, overall, Green Belt sub-areas are meeting Green Belt purposes strongly or weakly.

**Table 3.2 Criterion scores**

|   |   |                                       |
|---|---|---------------------------------------|
| Overall Strength of Green Belt Sub-area against Criterion | <b>Score</b>                              | <b>Equivalent Wording</b>             |
|   | <b>0</b>                                  | Does not meet Criterion               |
|   | <b>1</b>                                  | Meets Criterion Weakly or Very Weakly |
|   | <b>2</b>                                  | Meets Criterion Relatively Weakly     |
|   | <b>3</b>                                  | Meets Criterion                       |
|   | <b>4</b>                                  | Meets Criterion Relatively Strongly   |
| <b>5</b>  | Meets Criterion Strongly or Very Strongly |                                       |

## Purpose 1

### *To check the unrestricted sprawl of the large built-up areas*

In line with the GBA, the Purpose 1 criteria will be applied in relation to the following identified large built-up areas in Table 3.3.

**Table 3.3 Large Built-up Areas Used for the Purpose 1 Assessment**

| Spelthorne Large Built-up Areas   | Neighbouring Local Authority Large Built-up Areas   |
|---|---|
| Staines-upon-Thames / Egham (Runnymede)<br>Ashford / Sunbury-on-Thames / Stanwell <sup>14</sup> | Greater London built-up area (including Heathrow Airport) (LB Hillingdon, LB Hounslow, LB Richmond upon Thames) <sup>15</sup><br>Walton-on-Thames / Weybridge / Hersham (Elmbridge)<br>Chertsey (Runnymede)<br>Windsor (RB Windsor and Maidenhead)<br>Slough (Slough) |

This assessment will adopt the following definition of sprawl in line with the GBA: ‘the outward spread of a large built-up area at its periphery in a sporadic, dispersed and irregular way’. It considered whether a Local Area was situated at the edge of one or more distinct large built-up areas, and the degree to which the Local Area was contained by built-form. It also considered the linkage to the wider Green Belt, as well as the extent to which the edge of the built-up area had a strongly defined, regular or consistent boundary.

This definition is broadly maintained to ensure consistency with earlier work. As with the 2016 GBBR, the assessments will consider:

<sup>14</sup> Including the residential area comprising Edward Way, Orchard Way and Desford Way, located to the south of the A30 (London Road).

<sup>15</sup> Encompassing the Molesey, Dittons (Thames Ditton, Long Ditton, Hinchley Wood, and Weston Green), Hampton, Hanworth, Feltham and Bedfont.

1. Whether the Green Belt sub-area falls at the edge of one or more distinct large built-up area(s);
2. The degree to which the Green Belt sub-area is contained by built-form, and the nature of this physical containment, as well as the linkage to the wider Green Belt (including the presence of prominent physical features that would restrict the scale of outward growth and regularise potential development form);
3. The extent to which the edge of the built-up area has a strongly defined regular or consistent boundary.

### **Assessment 1(a)**

A sub-area must abut 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. Reflecting the more granular scale of the Supplementary Work compared with the 2016 GBBR, some sub-areas may not physically abut a large built-up area but may be visually or functionally linked to it. Therefore, judgement of whether a sub-area is at the edge of a large built-up area will be taken on a flexible basis utilising professional judgement, taking into account whether sub-areas are located within identified buffer zones for large built-up areas.

### **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. However, the extent to which a sub-area prevents sprawl is dependent on:

Its relationship with the respective built-up area(s); and

The presence of prominent features in the Green Belt which might restrict the scale of outward growth and ensure development is regular and/or 'tidy'.

The assessment will therefore focus on each of the aforementioned criteria, with the following criteria used for assessment:

- A sub-area predominantly surrounded or enclosed, either physically or perceptually, by two or more distinct large built-up areas, which also retains a strong link to the wider Green Belt, would play a particularly important role in preventing sprawl and would be identified as 'contiguous'.
- A sub-area displaying a low level of containment by a large built-up area, but still physically or perceptually abutting it, is likely to prevent the outward sprawl of a large built-up area and would be identified as 'connected'; its importance for preventing sprawl would depend on the presence of prominent man-made and natural features that would restrict the scale of outward growth, both physically and in more perceptual terms (e.g. in terms of visual impact), and regularise development form.
- A sub-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); this is referred to here as 'enclosed' by a single built-up area.

The NPPF states that Local Authorities should '*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent*' (paragraph 85). Where boundary features are identified at the edge of large built-up areas, sub-areas will be assessed based on the following broad definitions:

- Where the built-form edge was 'Regular', comprising well defined or rectilinear built-form edges or where large built-up areas are bounded by more durable features that are likely to be permanent, it was judged that the Green Belt plays a lesser role in preventing sprawl, and as such no '+' is assigned. Examples of such features include:
  - Infrastructure: motorway; public and man-made road; railway line; river.
  - Landform: stream, canal or other watercourse; prominent physical feature (e.g. reservoir embankment); woodland edges, tree belts and hedgerows; existing development with strongly established and regular boundaries.
- Where the built-form edge was 'Irregular', comprising ill-defined or softer edges or where large built-up areas are bounded by less durable, 'softer' features, a '+' was assigned in recognition of the role of the Green Belt in preventing sprawl in the absence of an alternative barrier. Examples of such features include:
  - Infrastructure: private/unmade road; bridleway/footpath; power line.
  - Natural: field boundary; fragmented/inconsistent tree line or hedgerow.

For sub-areas where the boundary between the large built-up area and the Green Belt comprises a mixture of different types of physical features, or where sections of the edge are unbounded, a degree of professional judgement will be employed in attributing the score.

**Table 3.4 Purpose 1 Assessment Criteria**

| Purpose            | Criteria   | Scores   |
|--------------------|--|--|
|                    | (a) Land parcel is at the edge of one or more distinct large built-up areas.   | AT EDGE: Sub-area meets Purpose 1.<br>NOT AT EDGE: Sub-area does not meet Purpose 1 and will score 0 for criteria (b)  |
|                    | (b) Prevents the outward, irregular spread of a large built-up area and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary. | <p>5+: Sub-area is contiguous with two or more large built-up areas; or connected to a large built-up area, protecting land adjacent to the large built-up area from urban sprawl where there are no boundary features to restrict the scale of growth and regularise development form. The large built-up area(s) is/are predominantly bordered by features lacking in durability or permanence.</p> <p>5: Sub-area is contiguous with two or more large built-up areas; or connected to a large built-up area, protecting land adjacent to the large built-up area from urban sprawl where there are no boundary features to restrict the scale of growth and regularise development form. The large built-up area(s) is/are bordered by prominent, permanent and consistent boundary features.</p> <p>3+: Sub-area is connected to a large built-up area, however there are boundary features present which may restrict the scale of growth and regularise development form. The large built-up areas is predominantly bordered by features lacking in durability or permanence.</p> <p>3: Sub-area is connected to a large built-up area, however there are boundary features present which may restrict the scale of growth and regularise development form. The large built-up areas is predominantly bordered by features lacking in durability or permanence.</p> <p>1+: Sub-area is enclosed by a large built-up area which is predominantly bordered by features lacking in durability or permanence.</p> <p>1: Sub-area is enclosed by a large built-up area which is predominantly bordered by prominent, permanent and consistent boundary features.</p> |
| <b>Total score</b> |  | <b>xx/5</b>  |

## Purpose 2

### *To prevent neighbouring towns merging into one another*

The Purpose 2 criterion (Table 3.6) is the same as that used in the GBA, and considers the extent to which sub-areas form parts of gaps preventing towns from merging, and whether these parts play an essential or less essential role in terms of

the overall gap. It will be applied to sub-areas in the context of the settlements in Table 3.5.

This assessment considers the openness of the Green Belt, in terms of whether it can physically or visually accommodate growth without fundamentally compromising the gaps between settlements. In determining the extent to which a gap prevents coalescence, various factors will be taken into consideration including distance, natural or man-made barriers and topography.

**Table 3.5 Settlements for Purpose 2 Assessment**

| Spelthorne Settlements                               | Neighbouring Authority Settlements   |
|--|--|
| Staines-upon-Thames                                  | Walton-on-Thames / Weybridge / Hersham (Elmbridge)   |
| Ashford / Sunbury-on-Thames / Stanwell <sup>16</sup> | Greater London (LB Hillingdon, LB Hounslow, LB Richmond upon Thames and Elmbridge) <sup>18</sup> |
| Shepperton / Lower Halliford                         | Addlestone (Runnymede)   |
| Upper Halliford <sup>17</sup>                        | Chertsey (Runnymede)   |
| Laleham  | Egham (Runnymede)  |
| Littleton  | Poyle / Colnbrook (Slough)   |
|  | Slough (Slough)  |
|  | Datchet (RB Windsor and Maidenhead)  |
|  | Old Windsor / Wraysbury (RB Windsor and Maidenhead)  |

**Table 3.6 Purpose 2 Assessment Criterion**

| Purpose   | Criterion   | Scores  |
|---|---|---|
| <b>To prevent neighbouring towns from merging</b> | 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. | <p>5: An ‘essential gap’ between non-Green Belt settlements, where development would significantly visually or physically reduce the perceived or actual distance between them.</p> <p>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.</p> <p>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.</p> <p>0: Sub-area does not provide a gap between any settlements and makes no discernible contribution to separation.</p> |

<sup>16</sup> Including the residential area comprising Edward Way, Orchard Way and Desford Way, located to the south of the A30 (London Road)

<sup>17</sup> Including the residential area at Tadmore Close, located to the south of Halliford Road

<sup>18</sup> Encompassing Molesey, Dittons (Thames Ditton, Long Ditton, Hinchley Wood, and Weston Green), Hampton, Hanworth, Feltham and Bedfont.

## Purpose 3

### *To assist in safeguarding the countryside from encroachment*

The Purpose 3 criterion (Table 3.7) is the same as that used in the GBA and considers openness (in terms of extent of existing built development) and the degree to which the Green Belt can be characterised as countryside.

The approach to the Purpose 3 assessment will be the same as that taken in the GBA. The percentage of built form within a Green Belt sub-area will be 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. This data will include buildings, surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures.

The score attributed to a sub-area will initially be determined on the basis of the percentage built form. However, scores will then be considered further in light of qualitative assessments of character, undertaken through site visits and revised as judged appropriate. This assessment will consider, in particular, the extent to which a sub-area might be reasonably identified as ‘countryside’ / ‘rural’ (in line with the NPPF). In order to differentiate between different areas, broad categorisation will be used to encompass assessments of land use (including agricultural use), morphology, context, scale and links to the wider Green Belt:

- ‘Strong unspoilt rural character’ will be 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.
- ‘Largely rural character’ will be 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, including ‘plotland’ development.
- ‘Semi-urban character’ will be 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’ will be defined as land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.

**Table 3.7 Purpose 3 Assessment Criterion**

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

## Purpose 4

### *To preserve the setting and special character of historic towns.*

The Purpose 4 criterion (Table 3.8) is the same as that used in the GBA and considers the extent to which a sub-area protects land in the immediate and wider context for a historic town. The approach to the Purpose 4 assessment will be the same as that taken in the GBA. Two aspects are of particular importance with regard to assessment of Green Belt against Purpose 4:

- The role of the sub-area in providing immediate context for the historic town (along the boundary between the settlement and the Green Belt), i.e. Staines-upon-Thames in this borough; and
- Contribution to views or vistas between the historic town and the surrounding countryside, looking both inwards and outwards where public viewpoints exist.

The relative importance of particular landforms or landscape features to the setting and special character of a historic town will be judged using the relevant Conservation Area Appraisals. Potential vistas will be identified using Ordnance Survey contour maps and will be sense checked on site visits.

**Table 3.8 Purpose 4 Assessment Criterion**

| Purpose   | Criterion  | Score  |
|---|--|--|
| <b>To preserve the setting and specific character of historic towns</b> | Protects land which provides immediate and wider context for a historic town, including views and vistas between the town and surrounding countryside. | 5: Sub-area plays an important role in maintaining the unique setting of a historic town by providing unspoilt vistas of surrounding countryside from within the settlement or unbroken vistas into the settlement from afar, and protects open land which has a strong connection with the historic core, contributing to its immediate historic setting. |

|  |  |   |
|--|--|---|
|  |  | <p>3: Sub-area plays an important role in maintaining the unique setting of a historic town by providing unspoilt vistas of surrounding countryside from within the settlements or unbroken vistas into the settlement from afar, or protects open land which has a strong connection with the historic core, contributing to its immediate historic setting.</p> <p>1: Sub-area makes a limited contribution to the broader setting of a historic town by providing a countryside setting for a historic core which is inward facing, and has a weak relationship with the surrounding countryside.</p> <p>0: Sub-area does not abut an identified historic town core.</p> |
|--|--|---|

### 3.6 Assessment of Impacts on the Wider Green Belt

In addition to assessment against the NPPF Purposes 1-4, an additional qualitative assessment will be undertaken to identify the role of the sub-areas as part of the wider Strategic Green Belt or Local Area within which they are located.

This will include a summary of the findings from the GBA about the wider Local Area in which the sub-area is located and a qualitative discussion on the importance of the sub-area to the performance of this wider area. Where relevant (e.g. where multiple sub-areas are considered for recommendation for release from the Green Belt), consideration will also be given to the impact of cumulative loss of the Green Belt. Where deemed notable, a comparison between the performance of the sub-area and the wider Local Area will be made. For sub-areas located on or over the borough boundaries, consideration will be given to available results from neighbouring authority Green Belt assessments.

Qualitative assessments will also be undertaken to further assess the following criteria:

- Would the potential release of a sub-area impact on the strength of the Green Belt boundary as a whole? For example, would the sub-area lead to a stronger or weaker Green Belt boundary, and would the new boundary be compliant with the requirements of NPPF paragraph 85 with regard to boundaries being define “clearly, using physical features that are readily recognisable and likely to be permanent”?
- Would the potential release of a sub-area impact on the assessment of the remaining Local Area(s) and adjacent Local Areas? For example, would the scores from the GBA for the Local Area(s) within which the sub-area is located, and those adjacent to the sub-area, be likely to change as a result of the sub-division and if so to what extent?
- Would the potential release of a sub-area impact on the long-term protection of the Green Belt? For example, how would removal of the sub-area from the

Green Belt impact on the Strategic Area identified in the GBA within which it is located?

The strategic assessments of each sub-area will be summarised in a table, to help determine overall performance, and inform recommendations.

### 3.7 Recommendations

Following the completion of the assessment against the NPPF purposes, and the wider strategic assessment, sub-areas will be categorised based on their performance against the NPPF purposes, and role within the wider strategic Green Belt (Figure 3.3). This process will highlight sub-areas meeting the purposes and wider role in the Green Belt to a lesser or greater extent. Further consideration will be given to boundary features, and recommendations for release will be made accordingly.

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**Figure 3.3 Methodology for Categorising Sub-Areas**

