

**EPSOM & EWELL GREEN BELT STUDY 2017**

<u>Report of the:</u>	Head of Place Development
<u>Contact:</u>	Karol Jakubczyk
<u>Urgent Decision?(yes/no)</u>	No
<u>If yes, reason urgent decision required:</u>	
<u>Annexes/Appendices (attached):</u>	Epsom & Ewell Green Belt Study (January 2017)
<u>Other available papers (not attached):</u>	National Planning Policy Framework

**REPORT SUMMARY**

National planning policy sets out how the Government attaches great importance to Green Belts. It also states that local planning authorities should use the opportunity provided by a review of a local plan to consider Green Belt boundaries having regard to their intended permanence in the long term, so that they remain relevant beyond the plan period. The current partial review of the Core Strategy provides an opportunity for us to reflect upon national planning policy. To that end, the Borough Council has instructed external consultants to prepare a Green Belt Study, which assesses the performance of our Green Belt against the five purposes set out in national planning policy. The Study will form part of our Local Plan's technical evidence base and will inform the preparation of new policy. This piece of technical evidence is now ready for publication.

**RECOMMENDATION (S)**

- (1) The Committee considers the Green Belt Study and agrees to its publication;
- (2) Notes that the Study identifies four sites, which are not currently part of the designated Green Belt but have been assessed as performing strongly against at least one of the purposes of the Green Belt; and
- (3) Agrees that the Study's outputs, including those relating to sites not currently designated as being within the Green belt, be used to inform the partial review of the Core Strategy.

*Notes*

## **1 Implications for the Council's Key Priorities, Service Plans and Sustainable Community Strategy**

- 1.1 The delivery and implementation of the Epsom & Ewell Local Plan contributes towards all of the Council's Key Priorities. The partial review of the Core Strategy is a critical part of the Local Plan review process as it will set out how sustainable growth will be delivered during the plan period.

## **2 Background**

- 2.1 The National Planning Policy Framework (NPPF) states that local planning authorities should use their evidence base to inform their plan making process. It specifically requires that local plans are based upon *"...adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area"*.
- 2.2 The NPPF reiterates the fundamental aim of maintaining Green Belts – namely that they prevent urban sprawl by keeping land permanently open. It also restates the five purposes that Green Belts serve<sup>1</sup>. Any assessment of whether land within the Green Belt remains fit-for-purpose will test the performance of that specific site against these five purposes. It is particularly noteworthy that land only has to serve one of the five purposes – not all five.
- 2.3 The NPPF also states that *"...the Government attaches great importance to Green Belts"* and that once established *"...Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."*
- 2.4 In the past Green Belt boundaries have remained largely fixed and unchanged – in most cases since their original designation. The NPPF demands that local planning authorities plan positively for growth (specifically housing) and 'leave no stone unturned' when considering options. With that in mind, the Borough Council would open itself to considerable risk if it failed to prepare an objective assessment of our Green Belt's performance against the five purposes as set out in the NPPF.
- 2.5 In order to secure a sound and robust review of our Green Belt to inform our plan making process, the Borough Council commissioned Atkins Limited to carry out a Green Belt Study. This technical exercise is now complete. A copy of the Study is enclosed under Annex 1.

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<sup>1</sup> NPPF Paragraph 80.

### **3 Epsom & Ewell Green Belt Study**

- 3.1 The Epsom & Ewell Green Belt Study is a technical evidence base document that provides an assessment of the designated Metropolitan Green Belt located within the Borough boundary. Its core purpose is to assess the extent to which land designated as Green Belt performs against the five purposes set out in national planning policy. In order to achieve a completely objective assessment, the Study takes a 'policy off' approach. Namely for the purposes of the Study other policy considerations, which under most normal circumstances would be considered along with Green Belt policy, are not brought into play. This may appear counterintuitive but it actually provides us with a more robust piece of evidence with which to defend our position than it otherwise would.
- 3.2 The Study defines the discrete land parcels that together comprise our Green Belt using physical features that are readily recognisable and likely to be permanent<sup>2</sup>. For the purposes of our Study, this included roads, railway lines, watercourses, established field boundaries, rights of way and areas of woodland.
- 3.3 Following their definition, each parcel's performance has been tested against the purposes of the Green Belt. The individual performance of each parcel was assessed and scored from 0, where the parcel is not performing against the purpose; through to 3, where the parcel is higher performing. No parcels had an overall score of 0. Parcels were not ranked against each other. Furthermore, each of the separate purposes of Green Belt are treated as having equal weight, and as a consequence a parcel may perform strongly against one purpose and poorly against another. It is again highlighted that, to be strongly performing, land only has to score highly against one of the five purposes – not all five. The performance of each individual parcel is set out under Table 2 (Annex 1) and is geographically illustrated under Appendices B – E (Annex 1).
- 3.4 The Green Belt Study included stakeholder engagement – specifically in relation to the methodology, and the identification and definition of individual parcels. This engagement process included a stakeholder workshop, which involved representatives from the Epsom Civic Society, the CPRE, Elmbridge Borough Council, the Royal Borough of Kingston, Mole Valley District Council and Reigate & Banstead Borough Council.
- 3.5 In relation to the performance of our existing Green Belt, the key messages from the Study are:
- a) The designated Green Belt within Epsom and Ewell is on the whole highly performing.

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<sup>2</sup> This approach is in accordance with NPPF Paragraph 85.

LICENSING AND PLANNING POLICY COMMITTEE  
(DATE OF MEETING)

- b) Whilst the Green Belt's character varies across the Borough, it continues to play a vital role in preventing urban sprawl, encroachment of the countryside and coalescence.
  - c) The Independent consultants have also concluded that those areas of Green Belt that adjoin the Borough's designated Conservation Areas are also successfully performing the purpose of preserving their setting and special character.
  - d) It is also noted that part of the Green belt located at Epsom Downs plays a wider role in preserving the setting of the historic core of London by safeguarding clear views into the City.
  - e) The majority of our Green Belt benefits from strong, durable and obvious boundaries that restrict the sprawl of urbanising development.
  - f) Two parcels (Parcel 17 and Parcel 53) performed highly against all four purposes.
  - g) Only one parcel (P29 – land east of Chantilly Way) did not perform (namely scored a zero) against three of the purposes.
- 3.6 In addition to assessing the performance of land already designated as Green Belt, the Study also provides an assessment of four discrete parcels of land that have in the past been suggested for consideration for inclusion within the Green Belt. These sites are land south of Worple Road and east of Chalk Lane; land east of Beverley Close; land at the Ridge; and land at and adjoining Nonsuch Park. The Study has found that all four sites perform highly against at least one of the purposes. In addition, two of the sites also performed moderately (namely scored two) against at two of the other purposes.
- 3.7 It is noted that Nonsuch Park is managed in partnership with the London Borough of Sutton. The Green Belt Study's assessment of the four sites will be used to inform the preparation of the forthcoming Issues and Options Consultation Paper, which is anticipated to come before the Committee during September 2017.
- 3.8 In conclusion, the Study is positive about the performance of our Green Belt. It also provides, for the first time, an assessment of the performance of undesignated land against the purpose of the Green Belt. This places the Borough Council in a strong position in terms of evidence that will inform the preparation and production of the partial review of the Core Strategy.

#### **4 Financial and Manpower Implications**

- 4.1 There is an on-going requirement to ensure effective cross boundary engagement on strategic planning issues. The resources needed to ensure that this happens are in place.

- 4.2 **Chief Finance Officer's comments:** The cost of the consultants has been funded from within the current Place and Development budget for 2016/17. The cost of publishing the study can also be funded from within the current Place and Development budget for 2016/17.

## 5 Legal Implications (including implications for matters relating to equality)

- 5.1 **Monitoring Officer's comments:** There are no legal implications arising directly from this report.

## 6 Sustainability Policy and Community Safety Implications

- 6.1 The partial review of the Core Strategy will contribute towards delivering the Council's objectives for maintaining and enhancing the Borough as a sustainable place to live, work and visit by providing guidance to new development proposals.
- 6.2 Any future policy options relating to the extent of the Green Belt will form part of the Core Strategy review process, which will be subject to a full Sustainability Appraisal report. This will be subject to public consultation at an appropriate time in the process.

## 7 Partnerships

- 7.1 The Duty to Cooperate requires that Local Planning Authorities engage with partners on strategic issues such as the Green Belt. We have already provided opportunities for our neighbours to engage through the stakeholder engagement process. We will continue to work with those neighbouring authorities that share our Green Belt issues to ensure that the purpose and performance of the Green Belt is not degraded.

## 8 Risk Assessment

- 8.1 Failure to provide a robust assessment of the purpose and performance of our Green Belt could leave the Borough Council open to challenge, with the associated threat of growth being directed onto sites not considered appropriate by the Council.
- 8.2 Whilst this area of risk has not previously manifested itself, the higher levels of housing growth being projected within Greater London and the wider South East of England places additional pressure upon the Borough.
- 8.3 By proactively planning for future growth, identifying where it should and should not go, we will place ourselves in a stronger position to resist unsustainable levels of growth in the wrong locations.

**9 Conclusion and Recommendations**

- 9.1 The Members of the Committee are asked to consider the Epsom & Ewell Green Belt Study; note the assessment of the land parcels that comprise the Green Belt; note the assessment of the four sites currently outside of the Green Belt and agree to its publication.
- 9.2 The Committee are also asked to acknowledge that the outputs from the Study will be used to inform the partial review of the Core Strategy.

**WARD(S) AFFECTED: (All Wards);**