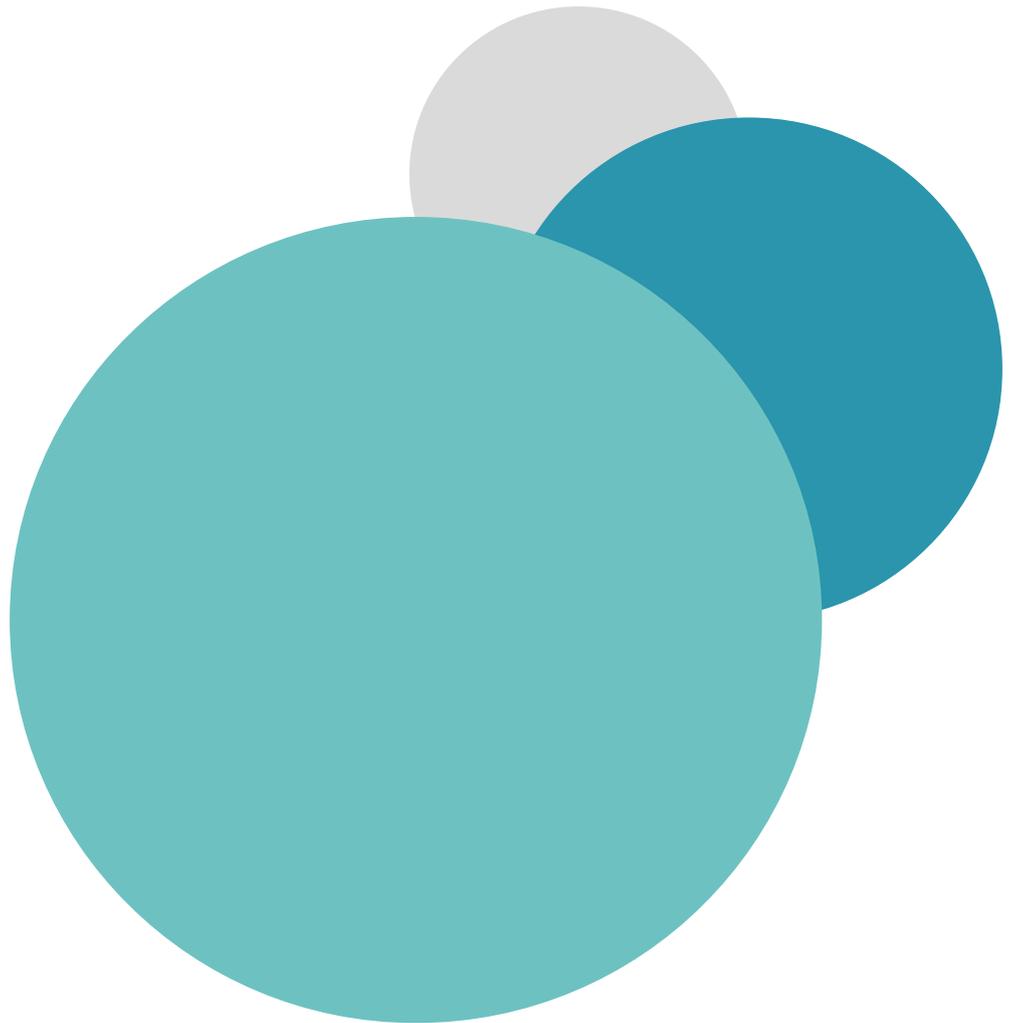


# **Green Belt Settlement Boundary Review Topic Paper**

**November 2020**



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### Acronyms:

LPP1 – Local Plan Part 1

LPP2 – Local Plan Part 2

NPPF – National Planning Policy Framework 2018

AONB – Area of Outstanding Natural Beauty

## 1. Background

- 1.1 As part of Waverley Local Part Plan Part 1 (LPP1) the Council commissioned a Green Belt Review, to look at the existing Green Belt in the borough, and how it is performing against the purposes set out in paragraph 134 of the NPPF. This was undertaken in two stages, with an initial strategic review, and a more detailed site assessment of areas which could be considered for review.
- 1.2 Much of Waverley's Green Belt is characterised by woodland and an undulating landscape which limits longer distance views but contributes to a distinctly rural character, even close to existing urbanised areas. The Green Belt Review found that overall the Green Belt is functioning effectively against its purposes. However, the review identified a number of areas for further assessment where land has the potential to be removed from the Green Belt, as well as areas which could be added. Part 2 of the Green Belt review considered these parcels in more detail.
- 1.3 It has been established through LPP1 that exceptional circumstances exist which justify a number of changes to the Green Belt where particular areas only make a limited contribution to the purposes of the Green Belt, in light of constraints on development in the Borough, the level of housing need, and pursuant to the objectives of sustainable development.
- 1.4 LPP1 identified removed two areas of land from the Green Belt at Godalming and one at Milford. The area removed at Milford Golf Course is also a strategic housing allocation in LPP1. The built-up areas of the villages of Elstead, Milford, Witley, and Chiddingfold have also been inset from the Green Belt. LPP1 also set out that there is potential for the Green Belt boundary around these villages to be adjusted to accommodate housing needs.
- 1.5 Whilst the principle of these changes has been established through LPP1, this only identifies broad areas for potential removal. The purpose of this topic paper is to set out the reasoning for the detailed changes to the Green Belt being made through LPP2.
- 1.6 This work has been carried out alongside a wider review of settlements boundaries across the Borough (The Settlement Boundaries Topic Paper). The new settlement boundaries will also follow the amended Green Belt boundary. An earlier version of this Topic Paper was published alongside the Preferred Options Consultation in May 2018. This update reflects feedback received from that consultation and from key stakeholders, and changes to proposed site allocations.

## 2. Review Methodology

- 2.1 The principal purpose of the Green Belt boundary changes in LPP2 is to define the detailed boundaries within those settlements where LPP1 identifies the potential need, in principle, to release land from the Green Belt. Policy RE2 of LPP1 states:

*“The following changes to the Green Belt will be made in Local Plan Part 2, with the boundaries to be defined following consultation with local communities: Detailed adjustments to the Green Belt boundaries (and Rural Settlement boundaries) around Chiddingfold, Elstead, Milford and Witley.”*

- 2.2 At the time of the earlier Preferred Options consultation on LPP2, it was the intention that LPP2 would make the Green Belt boundary changes for Chiddingfold, Elstead, Milford and Witley. However, the National Planning Policy Framework (NPPF) now allows for detailed amendments to be made to Green Belt boundaries in Neighbourhood Plans, where a need for changes to the Green Belt boundaries has been established through strategic policies. As the need to change the Green Belt boundaries at these settlements has been established in the relevant strategic policy in LPP1, it is now proposed that the detailed Green Belt boundary changes around Chiddingfold and Elstead, to accommodate planned housing growth, will now be made in the respective Neighbourhood Plans that are in preparation for those areas. As a result it is only in the parish of Witley, which includes the villages of Milford and Witley, where LPP2 will make the detailed Green Belt boundary changes required to accommodate planned growth, set out in principle in LPP1.
- 2.3 The driver for making the main Green Belt boundary changes around Milford and Witley comes from the need to enlarge the settlements in order to meet the housing allocation for Witley parish set out in LPP1. Therefore, the adjustment to Green Belt boundaries is closely aligned to the identification and assessment of sites suitable to accommodate the required additional housing.
- 2.4 It was through LPP1 that the principle of Green Belt changes were identified. The Council demonstrated the exceptional circumstances to justify the release of some land from the Green Belt in accordance with the Plan’s Spatial Strategy and to support the delivery of the required number of new homes. The key piece of Green Belt evidence that was relevant to the preparation and examination of LPP1 was the Green Belt Study undertaken by Amec in 2014. In essence that divided the Green Belt in Waverley into segments and assessed each segment in terms of how it performed against Green Belt purposes. Following the initial assessment, certain segments were identified for more

detailed consideration. Of particular relevance were the segments immediately surrounding the settlements.

### Green Belt Purposes

2.5 Paragraph 133 of the NPPF states that ‘The fundamental aim of Green belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.’

2.6 Paragraph 134 sets out that the five purposes of the Green Belt are:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

2.7 As part of the 2014 Study broad segments around Milford and Witley were assessed to identify whether these segments make a significant contribution, contribution, or limited contribution to the purposes of the Green Belt. The exception to this is the final purpose, which is about directing development to urban land wherever possible and as such is not a Green Belt purpose which land around rural villages directly contribute to. The Council has however sought to maximise the potential of land within the urban areas before considering development within the Green Belt.

2.8 Having regard to this evidence, LPP1 identifies some broad areas to the west/northwest of Milford and to the west of the Petworth Road in Witley as being potentially suitable for removal from the Green Belt. In addition, again informed by the Green Belt Review, LPP1 removed some land at Milford Golf Course from the Green Belt. This land is also a strategic site allocation in LPP1.

### Defining Boundaries

2.9 When defining detailed Green Belt boundaries, the NPPF (paragraph 139) states that 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;
- be able to demonstrate 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.

2.10 With regard to the fifth bullet point of paragraph 139 A significant proportion of the Borough is outside of the Green Belt, and opportunities for development on brownfield land are likely to emerge in the future. As such while it cannot be ruled out that further Green Belt releases will not be needed in the future, it has not been established there is a need to remove additional safeguarded land at this stage. Additionally, the strategic policies in LPP1 do not make provision for safeguarded land to be identified in LPP2. Therefore, the main Green Belt boundary changes around Milford and Witley are those required to meet the minimum housing requirement of the parish of Witley as set out in Policy ALH1 of LPP1.

2.11 A number of other minor changes to the Green Belt are proposed to correct anomalies and ensure the boundary accords with paragraph 139 of the NPPF, in particular point 6. While changes to the Green Belt should normally take place where exceptional circumstances have been demonstrated, the limited extent of these changes mean that they have no material impact on the function of the Green Belt, and are only proposed to ensure that the boundary on the ground is consistent with the final bullet of paragraph 139 of the NPPF.

2.12 In addition to these changes, associated background evidence to review settlement boundaries through LPP2 has identified areas where development has taken place since the boundaries were previously defined, as well as where improvements in mapping mean that minor changes would mean that the Green Belt boundary would better accord with the criteria for setting boundaries set out in the NPPF. These other adjustments to Green belt boundaries in LPP2, that are not specifically linked to planned growth have been identified in Milford and Witley, Chiddingfold, Elstead, Godalming and Haslemere. These minor changes are linked to the wider work that has been undertaken in LPP2 to review and update settlement boundaries generally.

### **3. Assessment of Potential Sites for Removal from the Green Belt in Milford and Witley to Accommodate Planned Growth**

- 3.1 During the earlier preparation of LPP2, the approach to identifying land that could potentially be removed from the Green Belt on the edges of Milford and Witley focussed only on land/sites within the broad areas shown by the asterisk notation in LPP1. This was the area to the west and north west of Milford and the segment of land west of Petworth Road in Witley (see Plan 5 in LPP1). However, the Council was mindful of strong representations from the Parish Council favouring consideration of land that was being promoted at the Secretts Garden Centre, which is located on the north eastern side of Milford. Witley Parish Council has continued to strongly advocate consideration of the Secretts site, including through their Neighbourhood Plan. Following the Neighbourhood Plan's examination, the Neighbourhood Plan sets out the community's preference for Secretts as supporting text. Waverley Borough Council has determined that the Neighbourhood Plan can go to referendum and is currently waiting for this to take place. In response the Council decided to take legal advice on whether it could consider for removal from the Green Belt in LPP2 any land not within one of the broad areas shown in LPP1. The advice was that there was nothing in law to prevent the consideration of other sites, but that there would need to be clear and cogent reasons for doing so.
- 3.2 In the light of this advice the Council decided to review sites around Milford and Witley that are both within and outside the broad areas shown in LPP1. There is a separate Topic Paper on the site selection process for the proposed LPP2 housing allocations in Witley. This covers the range of factors that the Council considered in deciding which sites to put forward for allocation in LPP2. As all of these sites are within or partly within the Green Belt, they are proposed to be removed from the Green Belt alongside being allocated for housing. This Topic Paper focusses on the Green Belt considerations and the evidence that has informed the site selection process.
- 3.3 A key part of the evidence base for the site selection is the "Green Belt Site Appraisals: Milford, Witley and Wormley" document (September 2020), which was produced by Wood Environmental and Infrastructure Solutions UK Ltd on behalf of the Council (the Wood Study). This evidence builds on the evidence in the 2014 Amec Green Belt Review, However, it differs from it in two ways. Firstly, it considers the Green Belt impacts on a site by site basis, rather than the larger segments used in the 2014 Study. Secondly, the site assessments contain two elements (a) it considers the contribution the site makes to Green Belt purposes; and (b) there is an assessment of the degree of harm associated with development of the site. Sites are ranked according to degree of harm in the following classifications: Limited, Moderate to Limited, Moderate, Moderate to Significant and Significant.

- 3.4 A total of 24 potential sites were considered in the Wood Study but not every site promoted to the Council was included in it. A number of sites were excluded from the assessment including: sites within 400m of the Wealden Heaths Special Protection Area (SPA), and greenfield sites which were considered unacceptable because they were not well connected to the existing settlement area.. The reason these sites were excluded is because it is unlikely that the effects of housing in such close proximity to the SPA can be adequately mitigated so the sites would not be suitable for housing allocation in any event.
- 3.5 Having undertaken this initial sieving process, the Wood Study involved a detailed assessment of the 24 sites. The outcome from the Study was a shortlist of six sites where the Study concluded that the potential harm to the Green Belt was either 'Limited' or 'Moderate to Limited'. Sites falling within the other categories were not taken any further. The Study recommended that these six sites should be taken forward for further consideration against planning criteria to determine their suitability. Three of the six sites shortlisted are the sites that the Council is proposing to remove from the Green Belt and allocate for housing in LPP2, namely: Land between Haslemere Road and Petworth Road (Highcroft), Milford; Land North of Wheeler Lane (Wheeler Street Nurseries), Witley; and Land between Portsmouth Road and Chapel Lane (Secretts Garden Centre), Milford.
- 3.6 In the case of the first two sites, the amended Green Belt boundaries are logical, linked to site boundaries or the likely extent of development. In the case of the Secretts Garden Centre, the definition of the Green Belt boundary has been informed by the land required to accommodate the development envisaged at the site, as well as current boundaries/enclosure. The critical boundaries are the boundary to the north east, which will follow a defined tree/hedge line, and the boundary to the north west. This is currently only defined by a track so would need reinforcing as part of any development on the site.
- 3.7 More information on the wider assessment of these sites and other sites promoted around Milford and Witley is set out in the Housing: Numbers, Site Assessments and Allocations Topic Paper.

## 4. Other Green Belt Boundary Changes in LPP2

4.1 As stated above there are some other minor changes to Green Belt boundaries contained in LPP2. These are linked to the work to review settlement boundaries generally. These changes affect Chiddingfold, Elstead, Godalming, Milford and Witley. Full details of these changes and associated maps detailing the changes can be found in the Settlement Boundaries Topic Paper.

### Chiddingfold

4.2 The Chiddingfold Neighbourhood Plan will be allocating sites to meet the requirements of LPP1 and making the necessary changes to the Green Belt boundary to achieve this. There is one other change to the Green Belt boundary in Chiddingfold that is included in LPP2. This is to correct an anomaly where the settlement and Green Belt boundary currently runs through the gardens of properties in Woodside Road. The proposed change would mean that the new boundary runs along the rear boundaries of these properties.

### Elstead

4.3 As with Chiddingfold, the Elstead Neighbourhood Plan will be allocating sites to meet the LPP1 housing requirement for Elstead and making the necessary Green Belt and settlement boundary changes to achieve this. In addition, LPP2 is making three minor changes to the Settlement/Green Belt boundary. One is in the vicinity of St James C of E School, the second affects land adjacent to 11 Westbrook Hill and the third is to extend the boundary to include Withybridge House. Full details of these changes and accompanying maps showing the changes can be found in the Settlement Boundaries Topic Paper.

### Godalming

4.4 In Godalming there are five proposed changes to address anomalies and factual updates. These relate to land on the north side of Peperharow Road, properties in College Hill, land between South Hill and Scizdons Climb, land at Woodside Park and land at the Godalming Football Ground. These are either to align the Green Belt boundary more closely with physical features or to reflect factual changes such as the granting of a planning permission. Full details of these changes and their justification, together with maps, can be found in the Settlement Boundaries Topic Paper.

### Milford and Witley

4.5 In addition to the Green Belt boundary changes required to accommodate the three LPP2 site allocations in Milford/Witley, there are two other minor changes proposed, both in Witley. One is at Birchwood, Gasden Copse and the other is at 1 and 2 Nightingale Close. Again, full details of these and the other Green Belt boundary changes in Milford and Witley, together with associated maps, can be found in the Settlement Boundaries Topic Paper.