Runnymede Borough Council Green Belt Review Part 2 Report

Final | 24 March 2017

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1 Introduction

1.1 Background

- 1.1.1 Ove Arup & Partners Ltd (Arup) has been appointed by Runnymede Borough Council (RBC) to undertake a Green Belt Review Part 2 (GBR Part 2) as part of the evidence base to support the Runnymede Local Plan. This study advances the Green Belt Review (GBR) undertaken by Arup in 2014.
- 1.1.2 The 2014 GBR considered how well the Green Belt in Runnymede (Map 1.1) was performing against the Green Belt Purposes, as set out in the National Planning Policy Framework (NPPF), and whether alterations to the existing boundaries could be made. The Green Belt within Runnymede was assessed in its entirety, split across 41 parcels (referred to as General Areas). The performance of each individual parcel was assessed against three of the five Purposes, with parcels further refined through additional considerations relating to development constraints.
- 1.1.3 The outcome of this process was the identification of a number of resultant land parcels, forming areas which the Council could consider for release from the Green Belt, if such an approach was necessary and justified as part of the wider Local Plan spatial strategy, and could be justified through the demonstration of exceptional circumstances.
- 1.1.4 Following the publication of the 2014 GBR, a number of interested parties submitted comments to the council regarding the methodology and conclusions set out in the study. Further detailed representations were also made during the Council's Issues, Options and Preferred Approaches (IOPA) consultation (Reg 18).
- 1.1.5 Following analysis of the submitted representations, Arup concluded that the methodology and approach to the assessment was robust, and that the conclusions formed from the 2014 GBR could be relied upon. However, it was noted that a number of representations expressed concerns that the Green Belt parcels assessed in the 2014 GBR were too large in size in some cases. It was argued that if smaller parcels had been considered, different conclusions would have been drawn in terms of how a site performed against the Green Belt purposes.
- 1.1.6 These comments were taken into consideration, and as a result Arup recommended to the Council that additional, more spatially focused work could be undertaken. It was suggested that a more finely grained review could be carried out, to better understand the performance of smaller parcels against Green Belt purposes, and their context in relation to the Green Belt as a whole.
- 1.1.7 The intention of this more refined and focussed assessment was to complement the conclusions formed in the 2014 GBR, and to ensure

that the Council has made every effort to identify appropriate land to meet identified needs. It was concluded by both RBC and Arup that the additional reviews should build on existing evidence to support the Runnymede 2035 Local Plan, and therefore not look to amend the Green Belt evidence already completed. The additional assessments within the GBR Part 2 will be used to inform the development of a new version of the Draft Local Plan, which it is anticipated will go out for a further Regulation 18 consultation in May 2017.

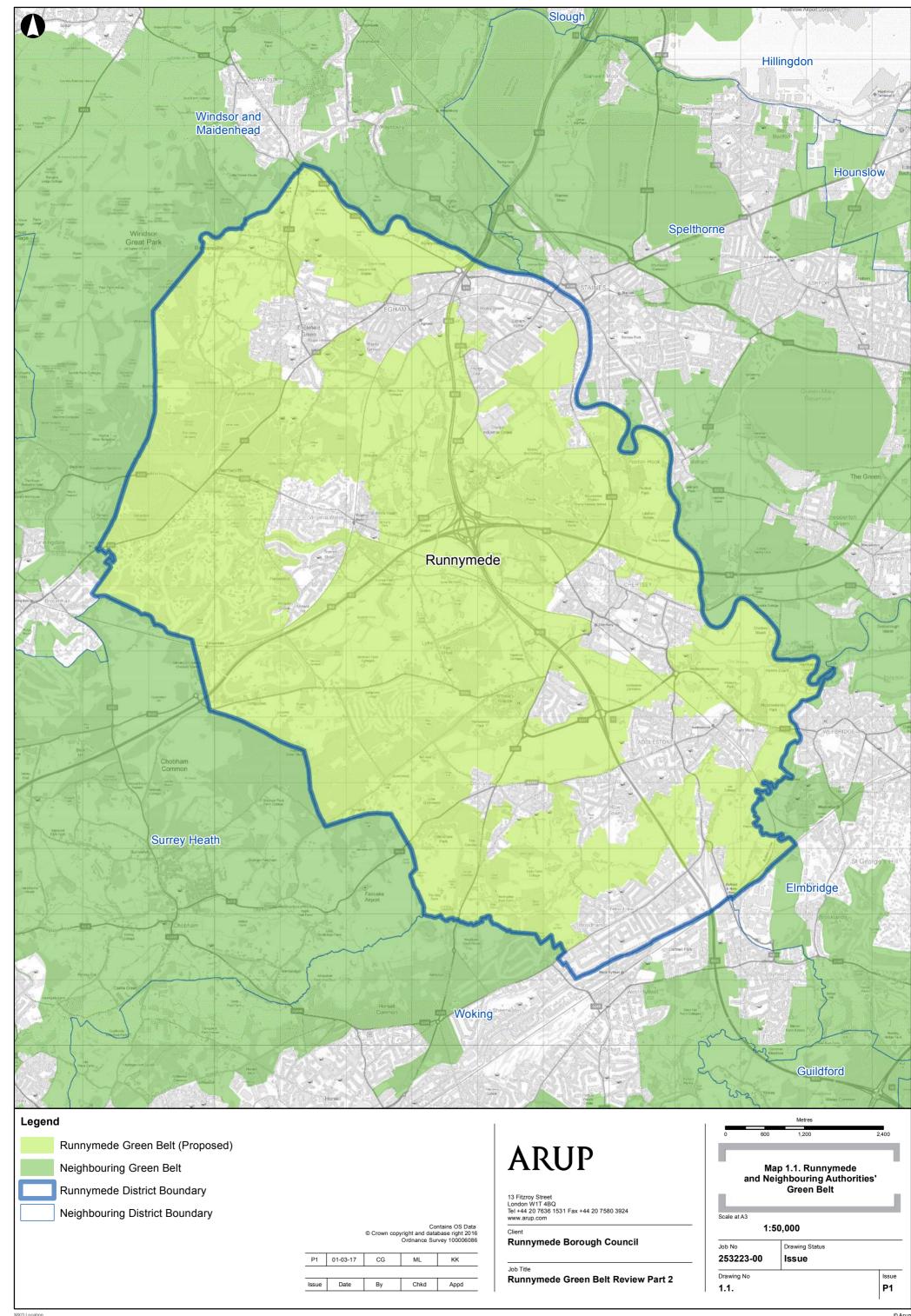
1.2 Purpose of the Review

- 1.2.1 The purpose of a Green Belt Boundary Review is to provide evidence of how different areas perform against the Green Belt purposes set out in national policy. Planning authorities may then take this into account alongside other evidence in making decisions about possible changes to Green Belt boundaries. A boundary revision can take the form of an expansion or a contraction. However, equally a Green Belt Boundary Review may conclude that no changes are appropriate.
- 1.2.2 The GBR Part 2 provides an independent and objective appraisal of Green Belt parcels identified through the GBR and subsequent work by RBC on their evidence base.
- 1.2.3 The GBR Part 2 responds to the guiding principles established by RBC, summarised as follows:
 - RBC's spatial strategy to date has been that urban and brownfield sites should be prioritised for development. Only when it became clear that there were insufficient available and suitable urban and brownfield sites to meet RBC's identified housing and employment needs were amendments to the Borough's Green Belt boundaries considered.
 - RBC's strategy has been to only consider sites for release from the Green Belt that can be shown to perform the most weakly against the purposes of including land within the Green Belt as set out in the NPPF. Sites must either form an extension to an existing urban settlement, or be large enough in their own right to form their own settlement.
 - Both Arup and Council officers remain of the opinion that the 2014 GBR is robust. As such, the GBR Part 2 should not look to amend the evidence already completed, but should take conclusions already drawn into account to ensure consistency.
 - The GBR Part 2 should take into account the 1988 publication from the Department of the Environment entitled 'The Green Belts' notes that the western sector [of the metropolitan Green Belt], from Sunningdale to Gerrards Cross [which contains Runnymede] is the most seriously fragmented of all.
 - The GBR Part 2 should consider the general extent of the Green Belt beyond the RBC boundaries.

- It is not the remit of the GBR Part 2 to consider exceptional circumstances arguments.
- It is reasonable to exclude some land from the Part 2 assessment based on the conclusions of the 2014 GBR and other evidence gathered by the Council to date. For example, an application of the absolute constraints as detailed in the 2014 GBR.
- Outcomes from the GBR Part 2 must be complementary to the Council's preferred vision and objectives for the Runnymede 2035 Local Plan, as set out in the Council's IOPA consultation document.
- The GBR Part 2 should not seek to balance Green Belt purposes with other sustainability objectives; the Council will undertake this balancing exercise as part of its wider site selection work that will underpin the Local Plan.

1.3 Structure

- **1.3.1** Following this introduction, this report is structured as follows:
 - Chapter 2 sets out the methodology for the Review.
 - Chapter 3 sets out the key findings of the Review.
 - Chapter 4 provides recommendations.
- 1.3.2 Annex Report 1 contains the Green Belt Area Assessment pro-formas.



2 Methodology

2.1 Introduction

- 2.1.1 The methodology for this study has been developed to further refine the conclusions identified as part of the 2014 GBR. The granular nature of this assessment has helped to ensure that smaller sites, which adjoin existing urban settlements and perform weakly against Green Belt purposes, have been correctly identified.
- 2.1.2 The methodology has been developed in line with previous experience and good practice identified elsewhere, alongside guidance documents such as the Planning Practice Guidance (PPG), Planning Advisory Service (PAS) guidance note on Green Belt policy, and the Landscape Institute guidance on landscape visual assessment.
- 2.1.3 As far as possible, the methodology has drawn upon and developed the approach used in the 2014 GBR. Table 2.1 illustrates how, at a broad level, the four considerations for identifying Resultant Land Parcels in the earlier 2014 Review have been incorporated into this GBR Part 2. It should however be noted that some of the more precise details of the methodology have been subject to minor variations, to reflect latest thinking on Green Belt assessments, and also to reflect the finer grain analysis required at this stage. Where this has been the case, the justification for this evolution has been clearly explained.

Table 2.1 Comparison of 2014 approach to identifying resultant land parcels and assessment of smaller areas in Green Belt Review Part 2

Factors taken into account in identifying Resultant Land Parcels (2014 Green Belt Review)	Factors considered as part of the Green Belt Review Part 2
Performance against NPPF Purposes 1-3 if considered separately to the wider General Area	Assessment of sub-areas against NPPF Purposes 1-3 (Section 2.3.2)
Role and importance in terms of the function of the wider Green Belt	Assessment of role in the wider, strategic Green Belt (Section 2.3.3)
The presence of boundary features which have the potential to be permanent and readily recognisable (subject to further, more detailed assessment)	Sub-areas identified for assessment in line with boundary features which have the potential to be permanent and readily recognisable (Section 2.1.3)
Spatial fit with the Borough's Local Plan settlements	Green Belt assessed in line with RBC's settlement buffers, which are in line with the Borough Centre Hierarchy (Section 2.1.1)

2.1.4 It was agreed in conjunction with RBC that it is not within the remit of the GBR Part 2 to consider exceptional circumstances arguments. It will fall to the Council to further assess the sustainability and delivery of the land parcels set out in the GBR Part 2 assessment, if it is

proposed to proceed with any Green Belt releases as part of the Local Plan.

2.2 Identifying the area to be subject to further Green Belt assessment

Apply settlement Buffers

- As part of the 2014 GBR, the entirety of the Green Belt in Runnymede was assessed against the NPPF purposes. In contrast, the GBR Part 2 feeds directly into RBC's site selection process, and therefore it was appropriate to undertake a more spatially focused piece of work, in line with the Council's site allocation strategy¹. Thus, only Green Belt land around existing settlements has been assessed.
- 2.2.2 To ensure the assessment was both comprehensive and consistent with the overall spatial strategy for the Borough, RBC developed indicative fixed buffers around each identified settlement. In determining an appropriate width of buffer, RBC carried out a literature review of broadly comparable studies elsewhere. On the basis of the literature review, the conclusions of the centre hierarchy paper, and following a high level consideration of the overall size of the Borough and spacing between settlements, as a starting point, the following buffers were drawn around all of the urban settlements in Runnymede:
 - 1km
 - 500m
- 2.2.3 In addition, a narrower 250m buffer was drawn around Thorpe Village, Ottershaw, and Englefield Green. However, following further consideration, it was felt that the 500m and 1km buffer widths were too large for Runnymede's urban settlements for this focussed and fined grained second phase of work. There was also concern that the 500m buffer was too large given the limited gaps between settlements in the southern part of the Borough in particular. Overall, it was decided that a 400m buffer would provide a reasonable buffer zone for the town centres and key service centres, and their surrounding urban areas. The 250m buffer was considered a reasonable buffer for the local service centres and their surrounding urban areas.
- These buffers indicated the likely maximum extent of sustainable development and vary according to the position of the settlement in the centre hierarchy, as set out in Table 2.2. This approach limited Green Belt assessments to within the defined buffers of the Borough's settlements, ensuring a proportionate and focussed study. It was felt this targeted approach was particularly justified given the fragmented nature of the Green Belt in North West Surrey.

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¹ The Runnymede Site Selection considers allocating sites that form an extension to an existing urban settlement, or would be large enough in their own right to form their own settlement.

2.2.5 Due to the work previously undertaken, it was felt that the consideration of wider buffers would to some extent cause duplication. Furthermore, assessing the area more widely on a finer grained basis might encourage unsustainable forms of development away from settlements (unless a site is large enough to form its own settlement), which could have an adverse effect on the integrity of the Green Belt.

Table 2.2 RBC-identified settlement buffers

Town Centres / Key Service Centres - 400m Buffer	Local Service Centres and surrounding urban areas - 250m Buffer
Addlestone	Thorpe Village
Chertsey/ Chertsey South	Ottershaw
Egham	Englefield Green
Virginia Water	
New Haw/Woodham	

Identify final areas for further assessment

- 2.2.6 To ensure alignment of this GBR Part 2 with the emerging Site Selection work, further consideration was afforded to the interaction between the settlement buffers and the sites promoted for development, as well as the Resultant Land Parcels identified through the 2014 GBR. It was decided that in circumstances where a site fell entirely or partially within an identified settlement buffer, the whole area was considered. In some cases, this resulted in the expansion of the area for assessment where promoted sites extended beyond the identified buffer areas.
- 2.2.7 The extent of the Resultant Land Parcels were then subject to an additional sense check. In cases where it was felt that the areas had a close functional or physical relationship with adjacent promoted sites, the extent of these areas were adjusted as necessary. An element of professional judgement was required to reach this decision. The assessment covered the full extent of the buffer, to ensure that sites that were not directly adjacent to the settlement, but still functionally related, were still considered as part of the assessment. The site selection process undertaken by RBC will ultimately discount areas on the basis of the relative sustainability of their location or other such factors.
- 2.2.8 Figure 2.1 illustrates the approach, in this example the full extent of all sites illustrated in yellow were assessed.

Runnymede Borough Council Green Belt Review Part 2

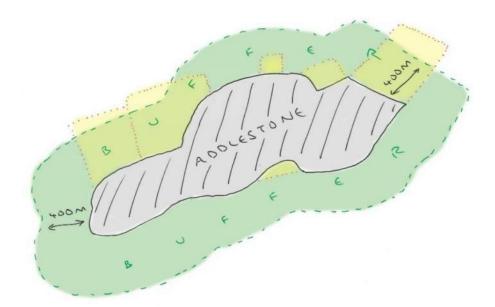


Figure 2.1 Approach to settlement buffers and promoted development sites²

2.3 Defining boundaries of the sub-areas for assessment

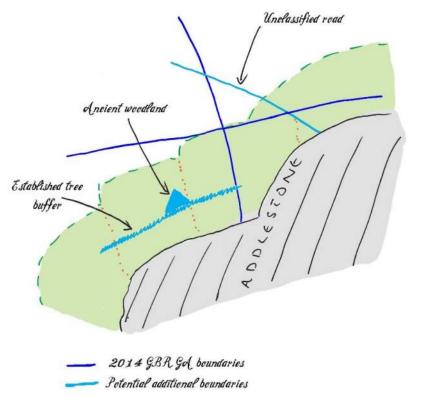
- 2.3.1 The process of defining the boundaries of the sub-areas was undertaken in line with the general principles used to identify the General Areas in the 2014 GBR, however applied on a more flexible basis.
- 2.3.2 The Green Belt Review identified General Areas on the basis of manmade and natural features that are readily recognisable and likely to be permanent:
 - M3 and M25 Motorways;
 - A and B Roads;
 - Railway lines;
 - River Thames; and
 - River Wey.
- 2.3.3 These boundary features were also used for the methodology of the GBR Part 2. However, due to the granular nature of the sub-areas, a range of smaller-scale features and durable boundaries also played a role in compartmentalising the Green Belt into smaller functional areas, including:
 - Unclassified public roads and private roads;
 - Smaller water features, including streams, canals and other watercourses;

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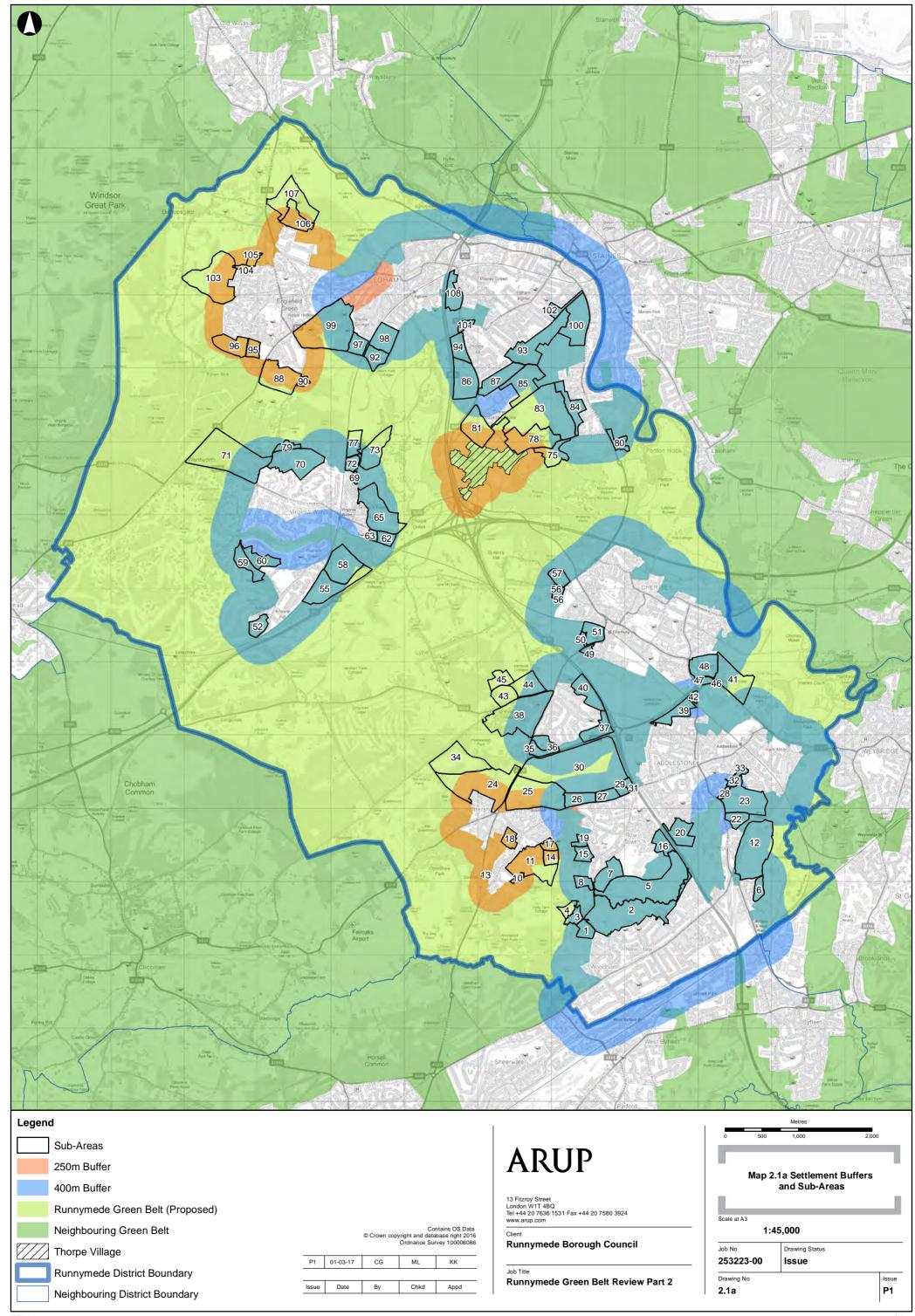
² Note that the sketch is for illustrative purposes only and does not accurately portray actual promoted development sites.

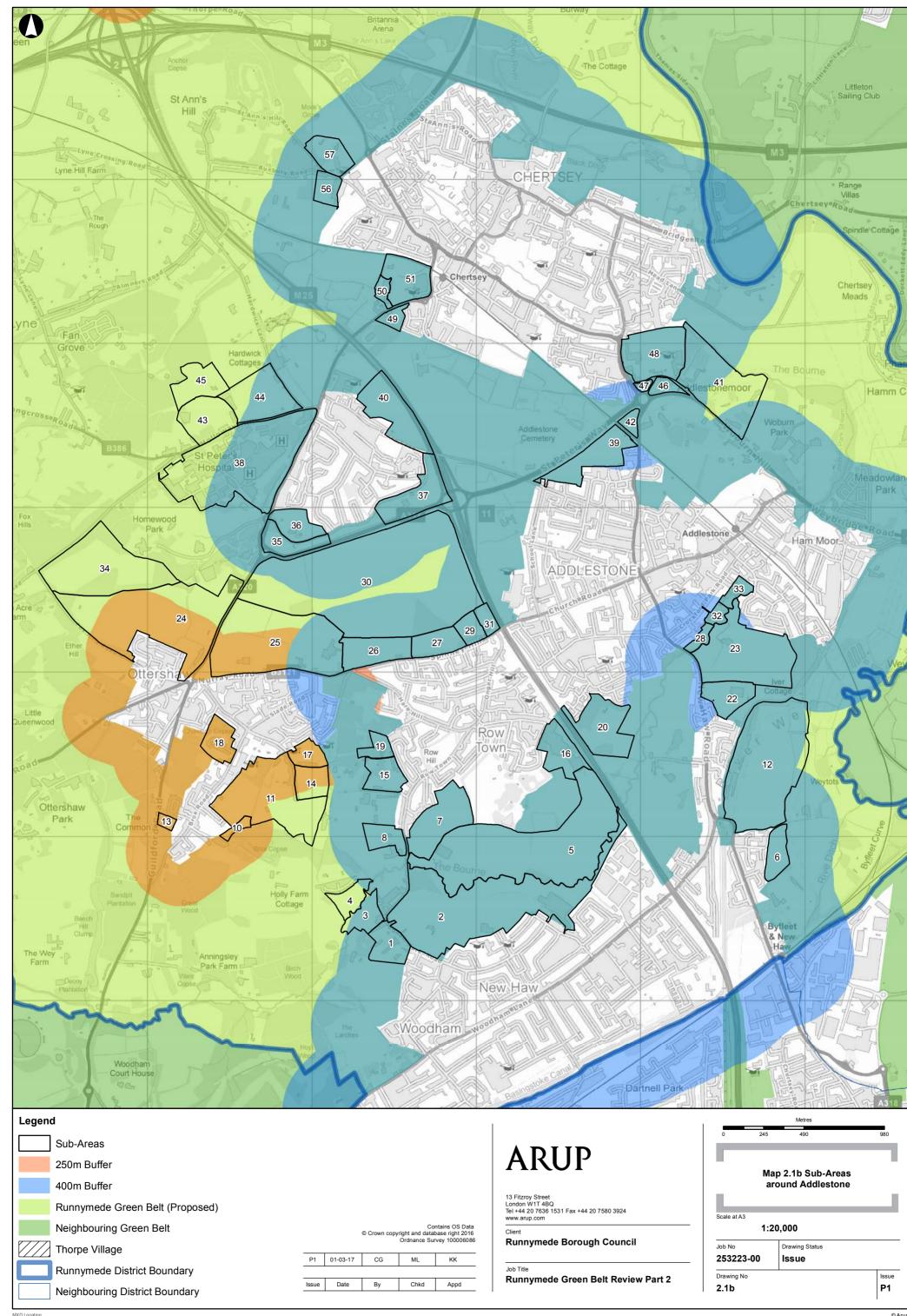
- Prominent physical features (e.g. ridgelines);
- Existing development with strongly established, regular and consistent boundaries;
- Well-established woodland edges, tree belts and hedgerows.
- 2.3.4 The sub-areas were initially identified through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps, 'birds eye' views and Google Earth. A small number of amendments to these sub-areas were made once the site-visits had been carried out, to better reflect the site characteristics. This process of refinement took account of the local context, and involved an element of professional judgement.

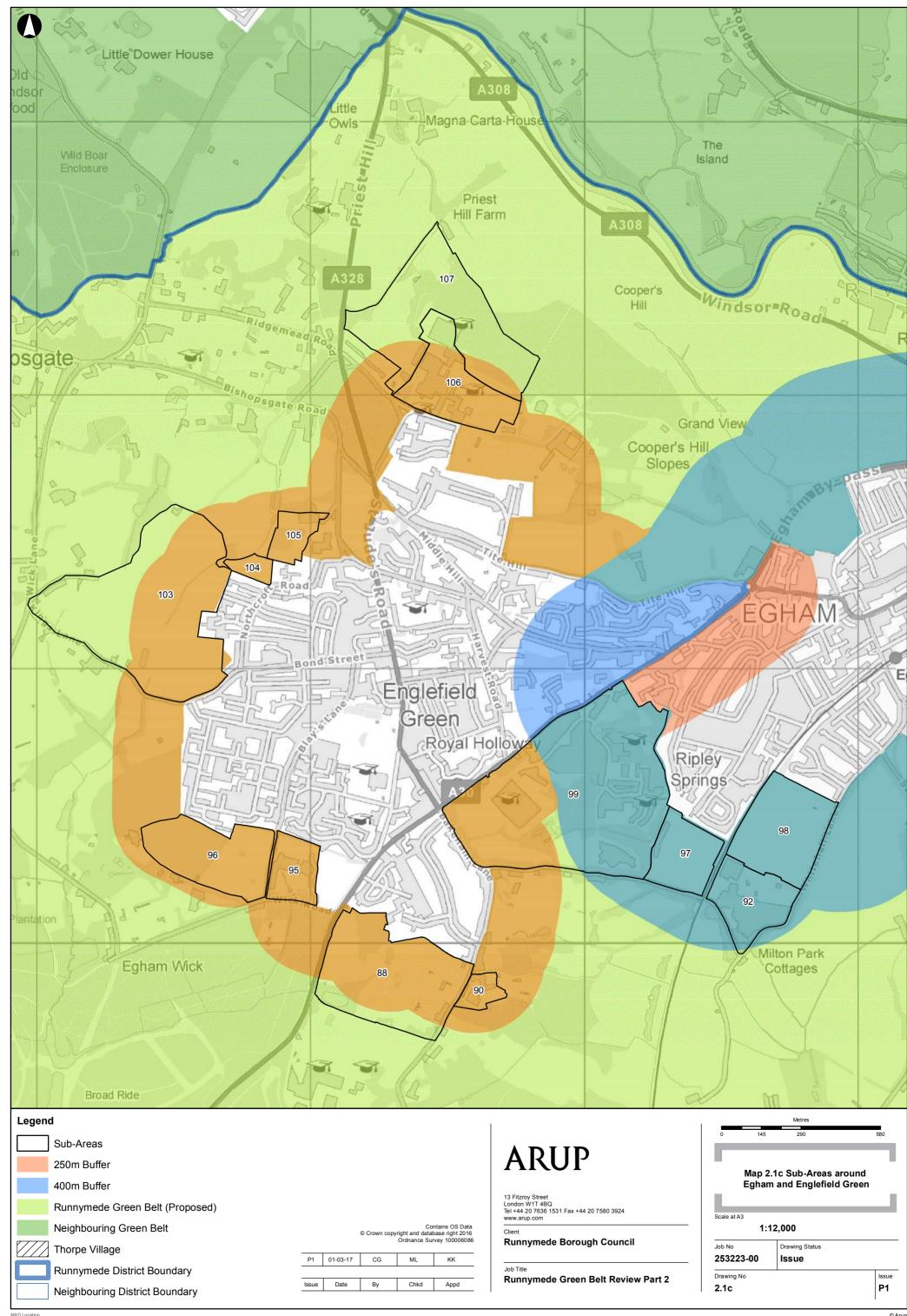
Figure 2.2 Approach to identifying sub-area boundaries

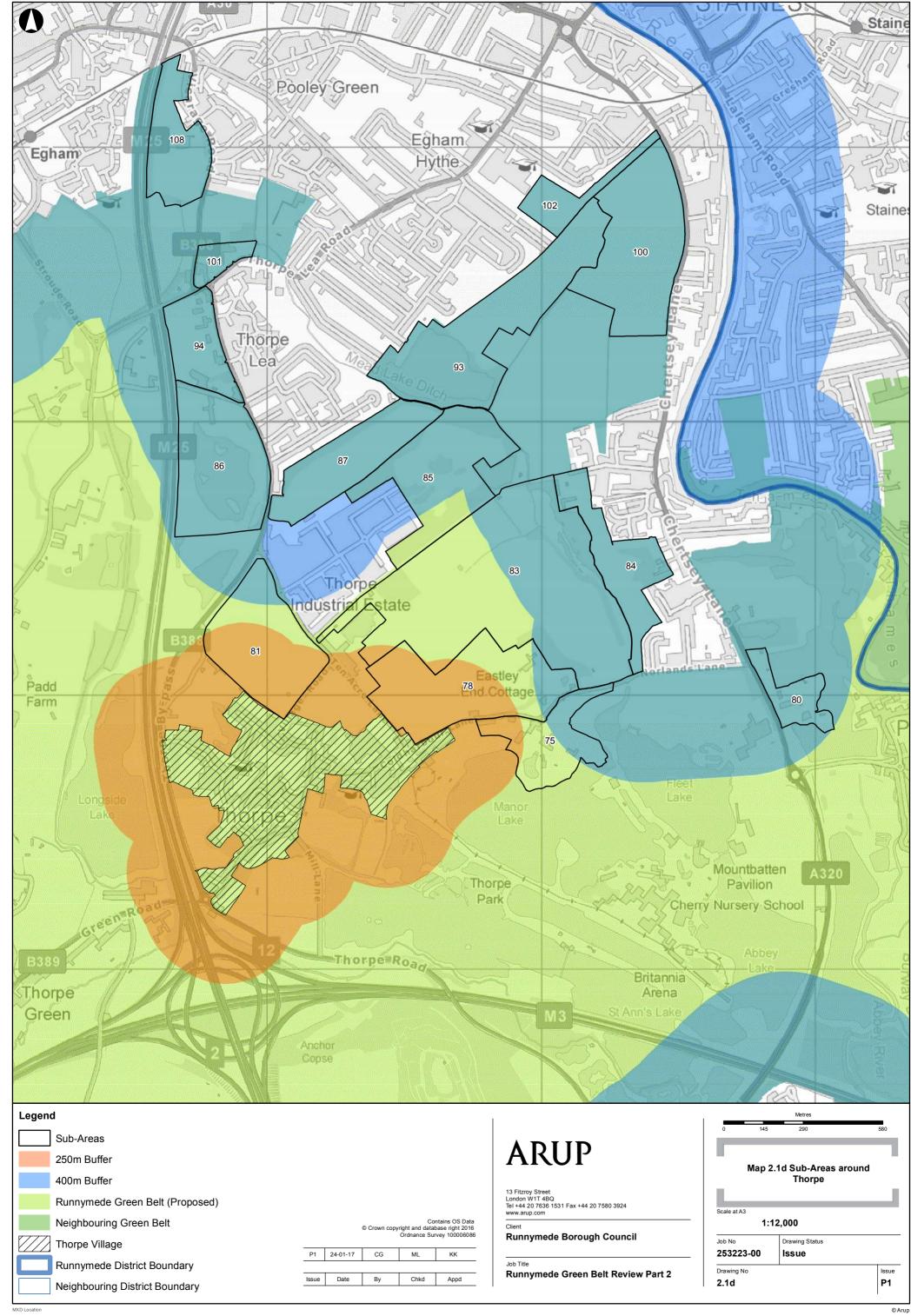


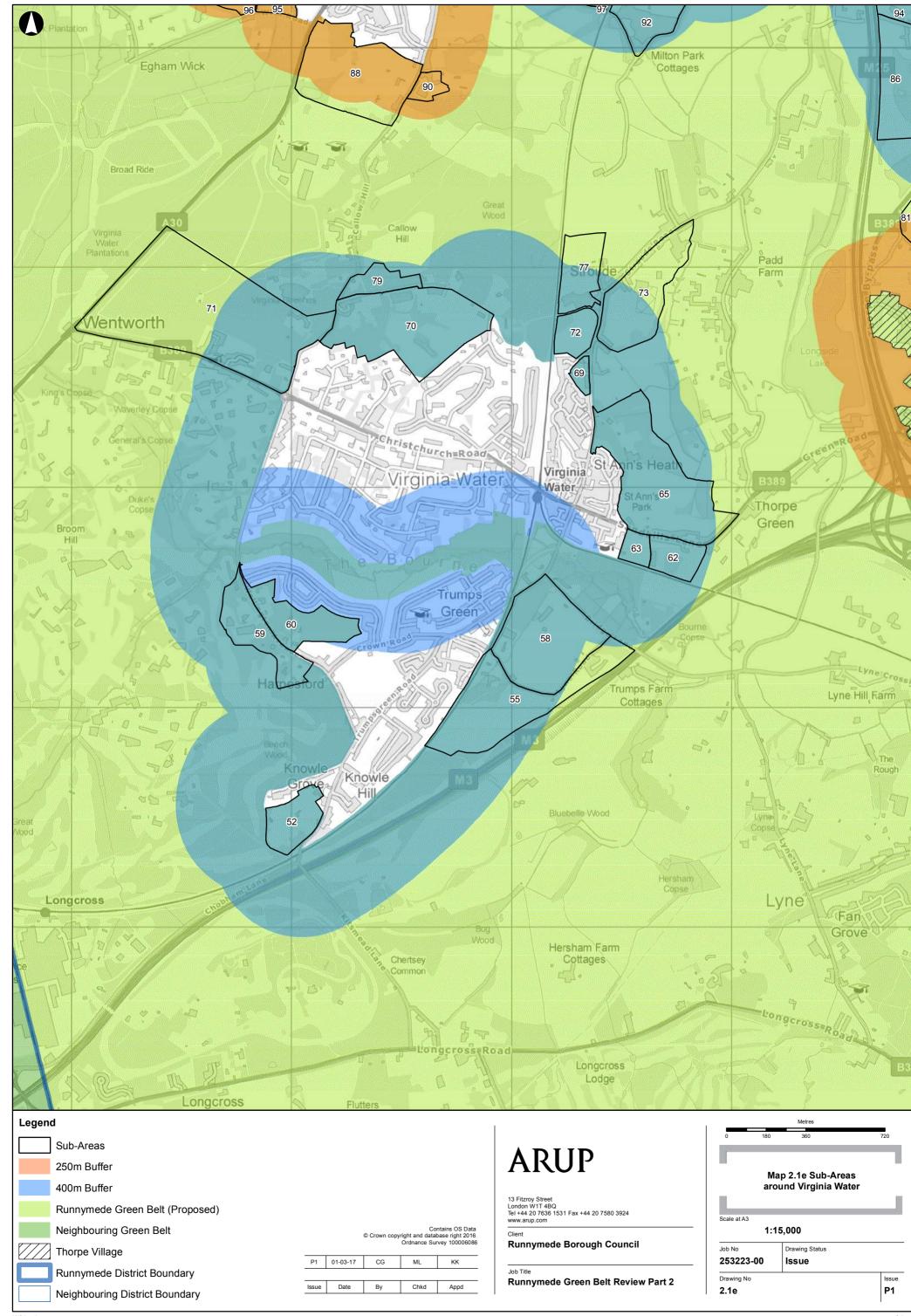
- 2.3.5 To ensure that the GBR Part 2 was pragmatic and aligned with the Site Selection process, sub-areas that were fully covered by absolute constraints within Site Selection were not assessed as part of this study. Areas that were only partially constrained however have been considered and included in this assessment.
- 2.3.6 The sub-areas assessed are illustrated spatially in Maps 2.1a-e. Each sub-area was assigned a new unique reference number, to reflect variations in the spatial extents of these new areas versus areas of land identified in previous studies (for example, the Resultant Land Parcels from the 2014 GBR, or sites identified in the SLAA).











2.4 Assessment of sub-areas against Purposes 1-3 of the National Planning Policy Framework

Site visits

- All sub-areas identified within the settlement buffers were visited to understand their immediate context, character and boundary features. Photographs of all sub-areas were taken (where access permitted) to illustrate their character, highlight relevant features and demonstrate their relationship with the wider Green Belt and adjacent settlements. The site visits were also used to sense check sub-area boundaries, including consideration of whether any further sub-division or combining of sub-areas was appropriate.
- 2.4.2 The site visits were carried out using a GIS-based site assessment tool, which recorded GPS-referenced observations and photographs directly into the assessment database. For each sub-area, detailed notes were recorded on site. This included noting any requirements to amend sub-area boundaries, for example where a previously identified boundary was deemed insufficiently defensible or a new boundary feature identified.

Assessment of Green Belt purposes

- 2.4.3 The approach to the assessment of Green Belt purposes remains broadly consistent with that adopted for the 2014 GBR. However, given the finer grained nature of the analysis, the approach has been updated in some instances, and applied on a more qualitative basis.
- 2.4.4 The assessment process involved a careful review of all sub-areas, to ascertain the extent to which Green Belt 'purposes' were fulfilled. As with the 2014 GBR, the assessments comprised 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 was supported by primary evidence from the site visits. The assessment involved the appraisal of each sub-area against the NPPF Purposes as a standalone area, however also took into account the scores awarded to the applicable General Area in the 2014 GBR. This comparison helped to consider the role of each sub-area as part of the wider, strategic Green Belt.
- 2.4.5 It should be noted, however, that there is no existing national guidance which establishes how such an assessment should be undertaken. The PAS guidance, recent examples of studies undertaken by other authorities, and our own previous experiences reiterate the need to reflect local circumstances and the unique characteristics that affect the way that the NPPF purposes of the Green Belt are appraised. The approach was therefore broadly aligned with the methodology developed for the 2014 GBR, with minor alterations made to reflect further developed thinking as well as the differing scale of assessment.

- 2.4.6 The aim of the assessment was to establish any differentiation in terms of how sub-areas in the existing Green Belt functioned and fulfilled the purposes of the Green Belt. The assessment of sub-areas was undertaken in two strands:
 - Assessment against the NPPF Purposes;
 - Appraisal of role and importance in terms of the function of the wider Green Belt (taking into consideration General Area scores from the 2014 GBR) and potential for mitigation of wider harm.
- As part of the methodology for the 2014 GBR, three of the five Green Belt purposes were considered. For consistency, this approach was maintained for this part of the assessment. As such, each sub-area was assessed against NPPF Purposes 1-3, set out below:
 - 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.
- 2.4.8 As with the 2014 GBR, one or more criteria have been developed for each purpose using both qualitative and quantitative measures, and a score out of five was attributed to each criterion.
- 2.4.9 In cases where a sub-area was considered to make no contribution to a specific purpose, in addition to the detailed analysis undertaken, a statement was added to this effect and no score was attributed.
- 2.4.10 It is important to note that each of the NPPF purposes is considered equally significant thus, consistent with the 2014 GBR, no weighting or aggregation of scores across the purposes was undertaken. As such, a composite judgement was necessary to determine whether, overall, Green Belt sub-areas are meeting Green Belt purposes strongly or weakly.

Table 2.3 Criterion scores

Overall Strength of	Score	Equivalent Wording
Green Belt Parcel against Criterion	0	Does not meet Criterion
	1	Meets Criterion Weakly or Very Weakly
	2	Meets Criterion Relatively Weakly
	3	Meets Criterion
	4	Meets Criterion Relatively Strongly
	5	Meets Criterion Strongly or Very Strongly

2.4.11 The broad definitions of each of the purposes of the Green Belt in relation to local objectives and role of the Green Belt in terms of achieving its purpose locally remain unchanged from the existing 2014 GBR and therefore are not repeated here.

Purpose 1 criteria

2.4.12 In line with the 2014 GBR, the Purpose 1 criteria was applied in relation to the following identified Large Built-Up Areas in Table 2.4. Figure 2.2 illustrates these areas spatially.

Table 2.4 Large Built-Up Areas used for the Purpose 1 Assessment
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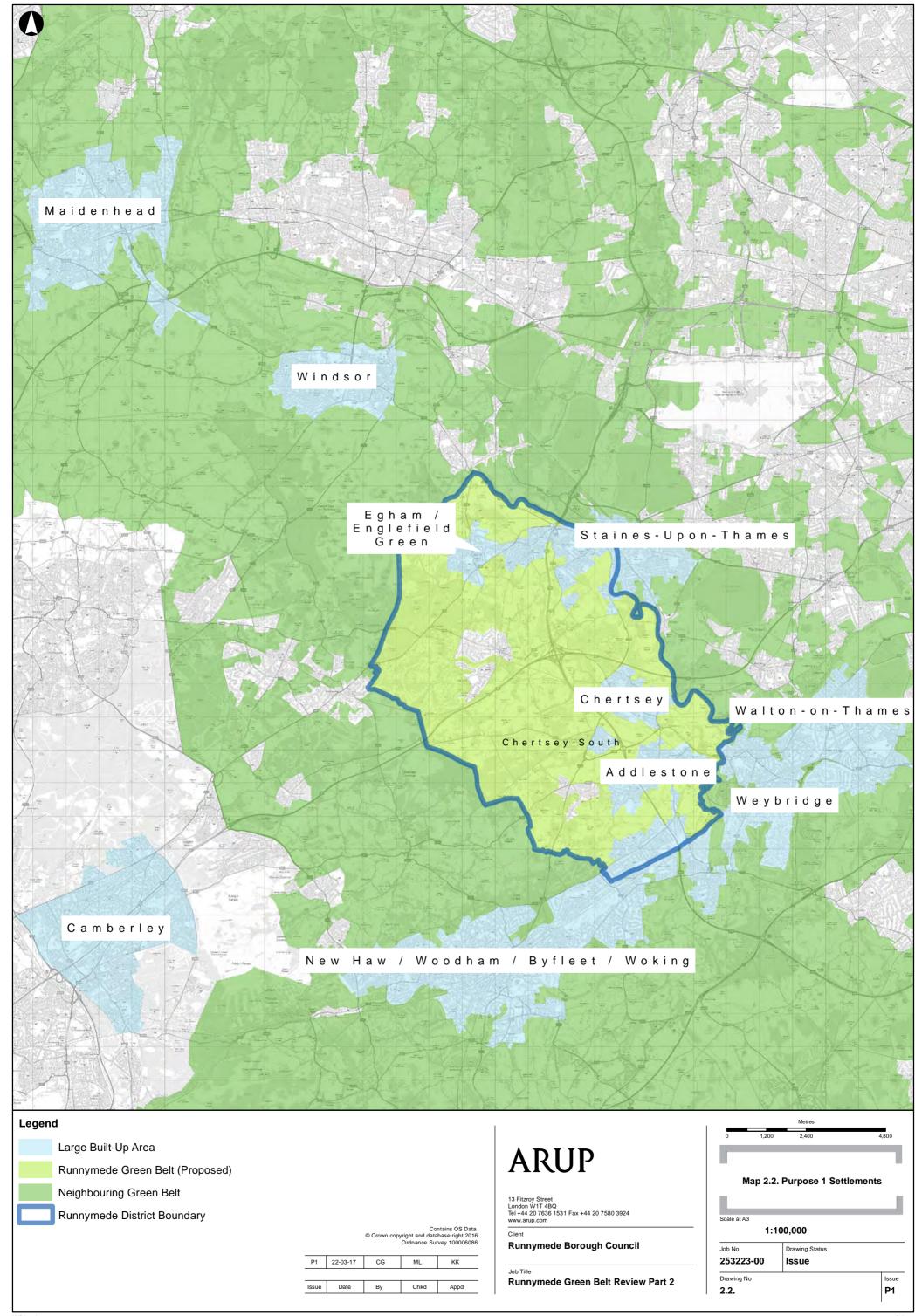
Runnymede	Neighbouring Local Authorities
Addlestone	Camberley (Surrey Heath)
Chertsey/ Chertsey South ³	Maidenhead (Windsor and Maidenhead)
Egham/ Englefield Green ⁴	Staines upon Thames (Spelthorne)
_gg.ee.e e.ee	Walton on Thames (Elmbridge)
	Weybridge (Elmbridge)
	Windsor (Windsor and Maidenhead)
	Woking (Woking) ⁵

- 2.4.13 The 2014 GBR defined sprawl as "The spread of built form over a large area in an untidy or irregular way". It considered the role of large, General Areas of Green Belt in protecting open land adjacent to large built-up areas, considering the level of containment or connection between open areas of Green Belt and the neighbouring large built-up areas. This definition was broadly maintained to ensure consistency with earlier work, however the assessment criteria have been adjusted to reflect the finer grain of assessment.
- 2.4.14 At this smaller scale, the assessments considered:
 - The extent to which Green Belt is preventing the irregular, outward spread of a large built-up area into open land;
 - The role of the Green Belt in preventing the sprawl of a large built-up area by creating a barrier in the absence of another permanent physical boundary.
- 2.4.15 In the 2014 GBR, this assessment was undertaken in two parts, with separate scores attributed to each. However, for this stage of work, the assessments have been combined into a single score, to address the possible perception of aggregation and reflect more recent Green Belt assessment experience, detailed below.
- **2.4.16** Green Belt should function to protect open land at the edge of large built-up areas. However, the extent to which a small sub-area prevents sprawl is dependent on:
 - Its relationship with the respective built-up area;

³ Chertsey and Chertsey South are considered to be part of the same large built up area in the assessment

⁴ Egham and Englefield Green are considered as one large built-up area in the assessment as these settlements have already coalesced. For the purposes of this assessment, the large built-up area incorporates the areas of Staines-on-Thames lying to the west of the River Thames.

⁵ Woking, New Haw, Woodham, Byfleet, West Byfleet and Sheerwater are considered as one urban area in the assessment as these settlements have already coalesced.



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• The openness of the Green Belt at the urban edge; 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'.

- 2.4.17 The assessment therefore focussed on each of the aforementioned criteria, with the following criteria used for assessment:
 - A sub-area physically abutting, or perceptually connected to⁶, a large-built area is likely to prevent its outward sprawl and would be identified as 'connected'; its importance for preventing sprawl would depend on:
 - the openness of the urban edge and the configuration of development in relation to the wider Green Belt;
 - 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.
- 2.4.18 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 were identified at the edge of large built-up areas, sub-areas were assessed based on the following broad definitions:
 - Where large built-up areas were 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 '+' was 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, regular and consistent boundaries.

⁶ It is recognised that, given the likely scale of the sub-areas for assessment, some areas may not be physically connected to a large built-up area but may be visually or functionally linked to it. Therefore, judgement of whether an area is connected to 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.

- 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 are likely to include:
 - Infrastructure: private/unmade road; bridleway/footpath; power line.
 - Natural: field boundary; fragmented/inconsistent tree line or hedgerow.
- 2.4.19 Where no boundary features separated the Green Belt from adjoining large built-up areas, the regularity of the urban edge and thus the importance of the Green Belt was instead considered as follows:
 - Where the built-form edge is 'Regular' or 'Consistent', comprising well-defined or rectilinear built-form edges, which would restrict development in the Green Belt, no '+' was assigned;
 - Where the built-form edge is identified as 'Irregular' or 'Inconsistent', comprising imprecise or softer edges, which would not restrict growth within the Green Belt, a '+' was assigned.
- 2.4.20 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 was employed in attributing the score.

Table 2.5 Purpose 1 Assessment Criteria

Purpose	Criteria	Scores
To check the unrestricted sprawl of large built-up areas	Prevents the outward, irregular spread of a large built-up area into open land, and serves as a barrier at the edge of a large built-up area in the absence of another durable boundary.	5+: Sub-area is connected to a large built-up area; it protects open 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 is predominantly bordered by features lacking in durability or permanence. 5: Sub-area is connected to a large built-up area; it protects open 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 is bordered by prominent, permanent and consistent boundary features. 3+: Sub-area is connected to a large built-up area, however the urban edge is not considered to be open and/or 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.

Purpose	Criteria	Scores
		3: Sub-area is connected to a large built-up area, however the urban edge is not considered to be open and/or 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.
		1+: Sub-area is enclosed by a large built-up area which is predominantly bordered by features lacking in durability or permanence.
		1: Sub-area is enclosed by a large built-up area which is predominantly bordered by prominent, permanent and consistent boundary features.
		0: Area not judged to be physically or perceptually connected to an identified large built-up area
Total score		xx/5

Purpose 2 criteria

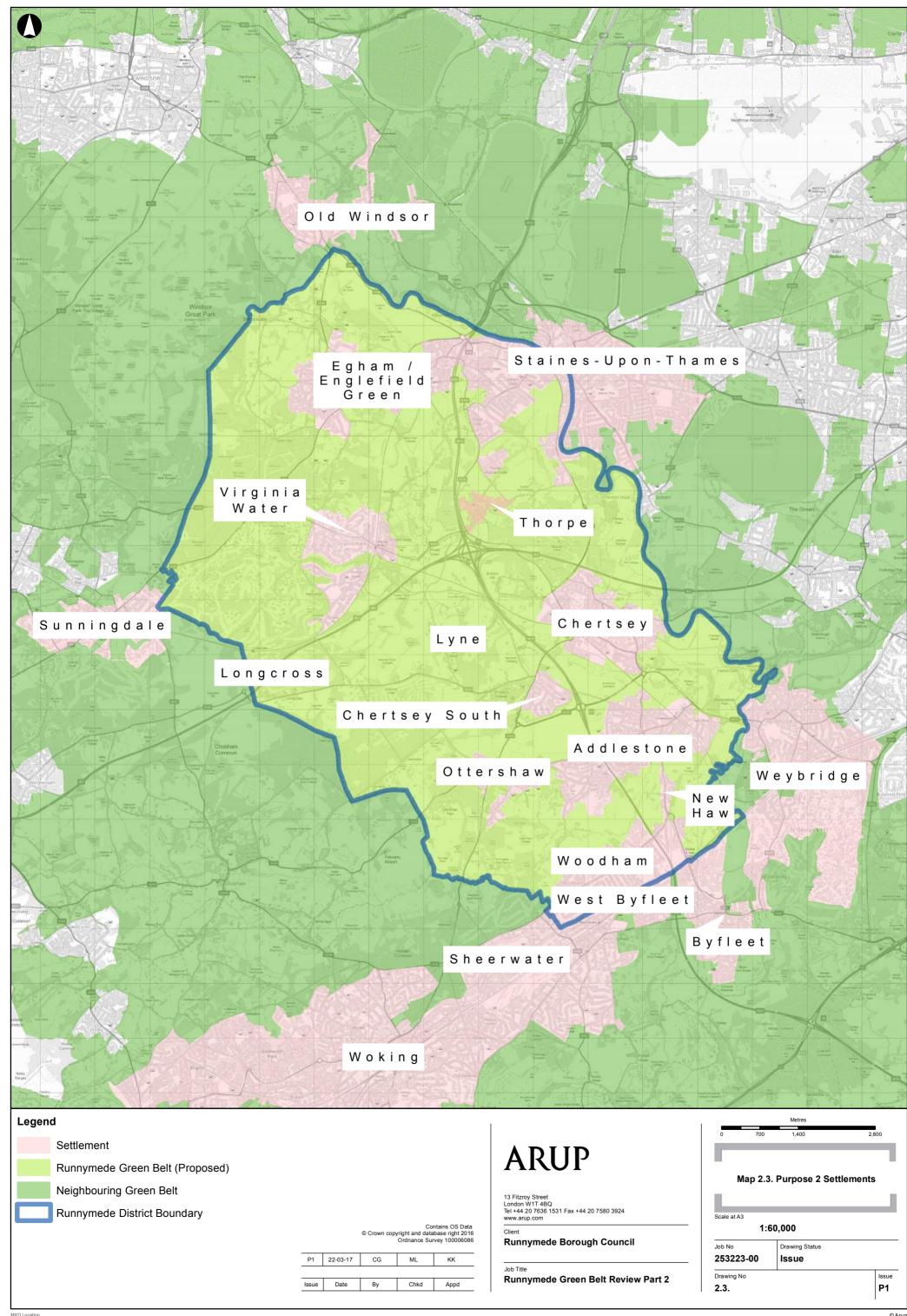
2.4.21 Purpose 2 criteria was applied to sub-areas in the context of the settlements in Table 2.6. Figure 2.3 illustrates these areas spatially.

Table 2.6 Settlements for the Purpose 2 Assessment

Runnymede Settlements	Neighbouring Settlements (Authority)
Addlestone	Byfleet (Woking)
Chertsey / Chertsey South	Old Windsor (Windsor and Maidenhead)
Egham/ Englefield Green ⁷	Sheerwater (Woking)
Longcross	Staines upon Thames (Spelthorne)
Lyne	Sunningdale (Windsor and Maidenhead)
New Haw	West Byfleet (Woking)
Ottershaw	Weybridge (Elmbridge)
Thorpe	
Virginia Water	
Woodham	

2.4.22 The criterion used to assess sub-areas against Purpose 2 is set out in Table 2.7. The assessment also considered the extent to which sub-areas formed parts of gaps, and whether these parts play an essential or less essential role in terms of the overall gap.

⁷ For the purposes of this assessment, this settlement incorporates the areas of Staines-on-Thames lying to the west of the River Thames.



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

Table 2.7 Purpose 2 Assessment Criteria

Purpose 3 criteria

- 2.4.23 The criteria used to assess the sub-areas against Purpose 3 are set out below. Ordnance Survey base maps and aerial photography were reviewed in order to undertake the openness assessment.
- 2.4.24 The percentage of built form within a Green Belt Parcel was calculated using GIS tools based on the land area of features that are classified as manmade (constructed) within the Ordnance Survey MasterMap data, excluding roads and railway lines. This data included buildings, some surfaced areas such as car parks, infrastructure such as sewerage treatment works, glasshouses and other miscellaneous structures.
- 2.4.25 The score attributed to a sub-area was initially determined on the basis of the percentage built form. However, scores were then considered further in light of qualitative assessments of character, undertaken through site visits and revised as judged appropriate. This assessment considered, 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 has been developed encompassing assessments of land use (including agricultural use), morphology, context, scale and links to the wider Green Belt:
 - 'Strong unspoilt rural character' was defined as land with an absence of built development and characterised by rural land uses and landscapes, including agricultural land, forestry, woodland, shrubland/scrubland and open fields.
 - 'Largely rural character' was defined as land with a general absence of built development, largely characterised by rural land

- uses and landscapes but with some other sporadic developments and man-made structures.
- 'Semi-urban character' was defined as land which begins on the edge of the fully built up area and contains a mix of urban and rural land uses before giving way to the wider countryside. Land uses might include publicly accessible natural green spaces and green corridors, country parks and local nature reserves, small-scale food production (e.g. market gardens) and waste management facilities, interspersed with built development more generally associated with urban areas (e.g. residential or commercial).
- 'Urban character' was defined as land which is predominantly characterised by urban land uses, including physical developments such as residential or commercial, or urban managed parks.
- 2.4.26 Given the more granular scale of assessment in this GBR Part 2, a six-point scale has been developed to more effectively differentiate between different sub-areas. The proposed built-form thresholds draw on recent Green Belt assessment experience.

Table 2.8 Purpose 3 Assessment Criteria

Purpose	Criterion	Score
Assist in safeguarding the countryside from encroachment	Protects the openness of the countryside and is least covered by development.	 5: Contains less than 5% built form and possesses a strong unspoilt rural character. 4: Contains less than 10% built form and/or possesses a strong unspoilt rural character. 3: Contains less that 15% built form and/or possesses a largely rural character. 2: Contains less than 25% built form and/or possesses a semi-urban character. 1: Contains more than 25% built form and/or possesses an urban character. 0: Contains more than 25% built form and possesses an urban character.
Total score		xx/5

Assessment of role in the wider, strategic Green Belt

2.4.27 In addition to the three Purposes, the assessment qualitatively considered the role of sub-areas within the context of the wider, strategic Green Belt. This included a summary of the findings from the 2014 GBR about the wider General 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, as well as the potential for mitigation of harm to the wider Green Belt. Where deemed notable, a

comparison between the performance of the sub-area and the wider parcel was made.

Pro-forma

2.4.28 A pro-forma for each sub-area recorded the assessments against each criteria, together with observations from site visits, including photographs. The overall scores and conclusions were recorded in an Excel spreadsheet. The proforma used in the 2014 GBR has been updated to reflect this methodology, and a copy can be found in Annex Report 1.

3 Key Findings

- **3.1.1** This section summarises the key findings from the assessment of the sub-areas against the NPPF purposes.
- 3.1.2 In accordance with the approach set out in Section 2.1, 94 sub-areas were identified for assessment (see Map 2.1a). At the end of this section Table 3.4 sets out the scores for each sub-area against NPPF Purposes 1-3 with the purpose scoring illustrated spatially in Maps 3.1-3.3 and overall scores in Map 3.4.
- **3.1.3** Detailed pro-formas setting out the assessments for each sub-area can be found in Annex Report 1.

3.2 Purpose 1 Assessment

- 3.2.1 The overall findings of the Purpose 1 assessment are illustrated spatially in Map 3.1, while Table 3.1 summarises the Purpose 1 scores.
- 3.2.2 Much of the Green Belt in Runnymede has a 'fragmented' pattern as a result of historic development patterns and major infrastructure, which often compartmentalises areas of land which remain open and weakens their links to the wider countryside. 21 of the 94 sub-areas, 22% of the total, meet Purpose 1 strongly (scoring 5 or 5+) by preventing the outward sprawl of large built-up areas.
- 3.2.3 These areas are generally clustered in the Borough's most in-tact swathes of open land. It was judged that these sub-areas restrict sprawl over areas of a larger scale where there are no natural or man-made features to limit the extent of sprawl into the countryside or check the form of development; for example, sub-areas 2 and 5, collectively prevent unrestricted outward sprawl of Addlestone from the north and New Haw/Byfleet/Woodham from the south into a tract of open countryside. Broadly, these more integral swathes can be identified in the east of the Borough around the Thames, along the River Bourne and around Runnymede and Windsor Great Park in the north-west, although several form a network of additional substantive 'fingers' of open land surrounding some of the Borough's large built-up areas (for example, the area comprising sub-area 30 between Chertsey (Chertsey South) and Addlestone (Row Town).
- 3.2.4 In total 34 sub-areas, 36% of the total, are judged as performing moderately against Purpose 1, scoring 3 or 3+. While the role of these areas in preventing the outward growth of large built-up areas is recognised, their lesser role in preventing sprawl may be due to one of two factors. Firstly, a number of these sub-areas are already predominantly developed where the Green Belt meets the edge of the large built-up area, thus contain development that may already be perceived as sprawl; for example, sub-area 94 contains a substantial proportion of built-form, including semi-industrial premises and

storage yards, whilst 38 comprises a densely developed hospital. Secondly, several sub-areas are bounded by durable man-made or physical features, which would limit the scale of outward growth and regularise development form; for example, sub-areas 35, 37 and 40 are closely bounded by major roads which would limit the outward expansion of Chertsey (Chertsey South) and ensure that this does not unduly protrude into the Green Belt.

- 3.2.5 9 sub-areas, 10% of the total, score weakly against Purpose 1, scoring 1 or 1+. These are 'enclosed' within large built-up areas and thus do little to prevent sprawl. In a number of cases, this has simply come about as a result of surrounding development patterns; for example, modern housing development at Pooley Green and Egham Hythe wraps around sub-area 108 to the east. In other cases, enclosed sub-areas have arisen as a result of modern infrastructure development which effectively brings formerly rural land within the settlement footprint; for example, sub-area 36.
- 3.2.6 30 of the 94 sub-areas (32%) are not connected to an identified large built-up area, either physically or perceptually, and do not directly prevent sprawl, thus failing to meet Purpose 1.

Purpose 1 Score	Number of sub-areas	Sub-areas
5+	6	2, 83, 85, 88, 103, 104
5	15	3, 5, 8, 12, 19, 20, 22, 23, 26, 30, 31, 44, 57, 81, 100
3+	7	1, 28, 40, 41, 84, 87, 105
3	27	6, 15, 27, 29, 32, 35, 37, 38, 39, 42, 43, 46, 47, 48, 49, 50, 56, 80, 86, 90, 93, 94, 95, 96, 97, 98, 106
1+	2	36, 102
1	7	7, 16, 33, 51, 99, 101, 108
0	30	4, 10, 11, 13, 14, 17, 18, 24, 25, 34, 45, 52, 55, 58, 59, 60, 62, 63, 65, 69, 70, 71, 72, 73, 75, 77, 78, 79, 92, 107

Table 3.1 Purpose 1 Summary of Scores

3.3 Purpose 2 Assessment

- 3.3.1 The overall findings of the Purpose 2 assessment are illustrated spatially in Map 3.2, while Table 3.2 summarises the Purpose 2 scores.
- 3.3.2 In broad terms, the strongest performing sub-areas are concentrated towards the east of the Borough. This is linked to development patterns, with a denser network of larger settlements separated by narrow gaps closer to London in the east, which opens out further

west into a more nucleated settlement pattern where settlements are separated by larger expanses of open countryside.

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- 3.3.3 13 out of 94 sub-areas, 14% of the total, perform strongly against this purpose, scoring 5. While this constitutes a relatively small proportion in terms of the number of sub-areas, it is notable that several of these are of a substantive scale and collectively these sub-areas represent around one third of the total area of Green Belt assessed. Given the focus of this Part 2 Review on Green Belt adjacent to settlements, this reflects the particularly important role that the Green Belt in Runnymede plays in preventing settlements from merging. A number of these sub-areas are generally clustered along more intensely developed corridors, where the Green Belt maintains gaps that are small in scale and often at risk of being compromised by ribbon development; for example, along Woburn Hill between Chertsey and Addlestone or between Thorpe and Egham (Egham Hythe). Others maintain the openness of strategically important, narrow gaps which, if further diminished, would harm the Green Belt's ability to prevent neighbouring towns from merging; for example, sub-areas 39 and 42 between Addlestone and Chertsey.
- 3.3.4 22 sub-areas, 23% of the total, perform moderately against Purpose 2, scoring 3. These sub-areas either form the entirety of 'wider gaps', maintaining wider areas of open land set in between more settled corridors, along river valleys and major roads; for example, between Virginia Water, Thorpe and Englefield Green in the north of the Borough. Alternatively, these sub-areas may from part of more 'essential' gaps, which although not essential for preventing merging of settlements continue to make a contribution to maintaining the openness and general scale of these gaps. It should be noted that, in some cases, smaller areas within these sub-areas may be less important for preventing coalescence; this is noted qualitatively in the pro-formas.
- 3.3.5 38 sub-areas, 40% of the total, perform weakly against Purpose 2, scoring 1. These sub-areas may form less essential gaps, those which are physically larger in scale (for example, the gap between Virginia Water and Sunningdale, which sub-area 59 forms part of) or are judged to be less essential parts of smaller-scale gaps; this might be as a result of their relatively limited scale, or as a result of physical or topographical features which restrict the potential for coalescence.
- 3.3.6 A further 21 sub-areas, 22% of the total, make no discernable contribution to the separation of settlements and do not meet Purpose 2. These are generally so small in scale that, in relative terms, they play no role as part of larger-scale gaps between settlements (for example, sub-areas 13, 60 or 105), and/or may be so closely associated with existing settlements that, and additionally subject to existing development, that they are effectively enveloped within the built area and do not form part of the gap to another settlement (for example, sub-areas 18, 33 or 69). It should be noted that, while these

represent 22% of the total number of parcels, they make up a small proportion of the Green Belt in terms of area.

Table 3.2 Purpose 2 Summary of Scores

Purpose 2 Score	Number of sub-areas	Sub-areas
5	13	2, 5, 12, 23, 24, 30, 39, 41, 42, 75, 78, 81, 83
3	22	3, 4, 8, 11, 14, 15, 19, 20, 22, 25, 26, 43, 44, 45, 46, 65, 73, 77, 86, 88, 106, 107
1	38	1, 6, 7, 16, 17, 27, 28, 29, 31, 34, 35, 36, 37, 38, 40, 47, 48, 50, 55, 56, 57, 58, 59, 62, 63, 70, 71, 72, 79, 80, 84, 85, 90, 92, 93, 96, 97, 99
0	21	10, 13, 18, 32, 33, 49, 51, 52, 60, 69, 87, 94, 95, 98, 100, 101, 102, 103, 104, 105, 108

3.4 Purpose 3 Assessment

- 3.4.1 The overall findings of the Purpose 3 assessment are illustrated spatially in Map 3.3, while Table 3.3 summarises the Purpose 3 scores.
- 3.4.2 All of the 94 sub-areas meet this purpose to a greater or lesser extent, reflecting the relatively high level of openness across much of the Green Belt in Runnymede.
- 3.4.3 20 of the 94 sub-areas perform strongly against this Purpose 3, scoring 4, with a further four scoring 5, very strongly. Collectively these make up 26% of the total. These tend to be located at the western extremities of the Borough's band of major settlements, which opens out into a wider band of more unspoilt countryside, or else at the outer edges of the identified settlement buffers. Three 'fingers' of more unspoilt countryside also permeate into the more developed areas in the east of the Borough: between Addlestone (Row Town) and New Haw/Byfleet/Woodham (including sub-areas 2 and 5); between Addlestone (Row Town), Ottershaw and Chertsey (Chertsey South) (including sub-areas 24, 30 and 34); and between Thorpe, Egham Hythe and Staines upon Thames (including sub-areas 85, 93 and 100).
- 3.4.4 32 sub-areas, 35% of the total, perform moderately against this purpose, scoring 3. These sub-areas, distributed widely across the Borough, include areas of open countryside that are subject to some urbanising influences, such as ribbon development or large-scale infrastructure, or contain areas with a contrasting, more urbanised character. It should be noted that these continue to play some role in preventing encroachment into the countryside.
- 3.4.5 33 sub-areas perform weakly against this purpose, scoring 2, with a further five sub-areas scoring 1, very weak. Together, these comprise 40% of the total. This notably high proportion reflects the focus of the assessment on smaller-scale areas of Green Belt around the edges of

settlements, but also the level of fragmentation of the overall Green Belt around Runnymede. These have suffered previous encroachment and possess semi-urban or urban characteristics with higher levels of built form, interspersed amongst some areas of open land.

Table 3.3 Purpose 3 Summary of Scores

Purpose 3 Score	Number of sub-areas	Sub-areas
5	4	5, 30, 79, 103
4	20	2, 12, 14, 24, 34, 42, 44, 45, 58, 71, 72, 77, 81, 85, 88, 93, 96, 100, 104, 107
3	32	3, 4, 6, 7, 11, 13, 15, 18, 19, 20, 23, 25, 26, 27, 35, 37, 39, 40, 43, 49, 52, 55, 57, 60, 65, 70, 83, 84, 86, 87, 98, 102
2	33	1, 8, 10, 16, 17, 22, 28, 29, 31, 32, 33, 36, 38, 41, 46, 48, 50, 51, 56, 59, 62, 63, 73, 75, 78, 80, 94, 95, 97, 99, 105, 106, 108
1	5	47, 69, 90, 92, 101
0	0	N/A

3.5 Purposes Assessment Summary

- 3.5.1 All 94 sub-areas meet one or more of the NPPF purposes to varying degrees. All individual purpose scores for sub-areas are set out in Table 3.4.
- In order to summarise the outcomes from the assessment and begin to draw overall conclusions from the assessment against the NPPF purposes, sub-areas have been categorised as follows:
 - 38 of the sub-areas are judged to be strongly scoring Green Belt, meeting at least one of the purposes strongly;
 - 42 sub-areas are judged to be moderately scoring Green Belt, with a moderate score (3) against at least one purpose and failing to score strongly (4 or 5) against any purpose;
 - 14 sub-areas are judged to be weakly scoring Green Belt, failing to meet or weakly meeting all purposes (scoring 0, 1 or 2).
- 3.5.3 The categorisation of sub-areas following the purposes assessment is also set out in Table 3.4 and illustrated in Map 3.4.

3.6 Strategic Green Belt Assessment

3.6.1 Reflecting the more granular focus of the GBR Part 2, additional qualitative assessment was undertaken to identify the role of sub-areas as part of the wider, 'strategic' Green Belt Parcels in which they sit. The findings of the GBR were used to undertake this assessment. This involved:

- Comparing the contributions made by the sub-area to the NPPF purposes against the performance of the wider Parcel;
- Highlighting instances where sub-areas make a lesser contribution or, locally, play a particularly important role in terms of the wider strategic Green Belt;
- Drawing on these factors, identifying whether the de-designation of the sub-area would harm the integrity of the wider Green Belt, and whether any mitigation would be required to limit or remove this harm.
- 3.6.2 Each sub-area was individually assessed. As a result of particular nuances in each instance, detailed commentaries are provided in the pro-formas in Annex Report 1. The findings can broadly be grouped as follows:
 - 51 of the 94 sub-areas, over half, are identified as important to maintaining the integrity of the strategic Green Belt, with little or no scope for mitigation of this harm;
 - 35 sub-areas, over one third, are identified as less important to the integrity of the strategic Green Belt, where the loss of the sub-area is unlikely to harm the wider Green Belt;
 - In the case of two sub-areas, spatial variations in the level of potential harm to the wider Green Belt are identified;
 - 6 sub-areas are identified as less important to the integrity of the strategic Green Belt, but where mitigation would be required to limit harm to the wider Green Belt.

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Table 3.4 Overall Summary of Findings for Purposes Assessment

		Purpose Assessments				
Sub-	Area	Purpose 1 – To check the unrestricted	Purpose 2 – To prevent neighbouring	Purpose 3 – Assist in safeguarding the	Overall	
area ref	(ha)	sprawl of large built-up areas	town from merging	countryside from encroachment	Summary	
		Prevents the outward, irregular spread of	Prevents development that would result			
		a large built-up area into open land, and	in merging of or significant erosion of	Protects the openness of the countryside		
		serves as a barrier at the edge of a large	gap between neighbouring settlements	and is least covered by development		
		built-up area in the absence of another	including ribbon development along			
	4.77	durable boundary	transport corridors that link settlements	-	3.6.1	
1	4.7	3+	1	2	Moderate	
2	38.3	5+	5	4	Strong	
3	3.5	5	3	3	Strong	
4	3.1	0	3	3	Moderate	
5	41.3	5	5	5	Strong	
6	3.6	3	1	3	Moderate	
7	9.9	1	1	3	Moderate	
8	3.4	5	3	2	Strong	
10	0.9	0	0	2	Weak	
11	20.2	0	3	3	Moderate	
12	30.7	5	5	4	Strong	
13	0.8	0	0	3	Moderate	
14	3.8	0	3	4	Strong	
15	4.2	3	3	3	Moderate	
16	5.9	1	1	2	Weak	
17	2.8	0	1	2	Weak	
18	4.1	0	0	3	Moderate	
19	2.2	5	3	3	Strong	
20	9.5	5	3	3	Strong	
22	5.0	5	3	2	Strong	
23	19.3	5	5	3	Strong	

	Purpose Assessments				
Sub- area ref	Area (ha)	Purpose 1 – To check the unrestricted sprawl of large built-up areas	Purpose 2 – To prevent neighbouring town from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Overall Summary
24	33.4	0	5	4	Strong
25	28.5	0	3	3	Moderate
26	6.8	5	3	3	Strong
27	4.4	3	1	3	Moderate
28	1.3	3+	1	2	Moderate
29	2.4	3	1	2	Moderate
30	70.7	5	5	5	Strong
31	1.7	5	1	2	Strong
32	1.3	3	0	2	Moderate
33	1.8	1	0	2	Weak
34	20.7	0	1	4	Strong
35	4.3	3	1	3	Moderate
36	4.4	1+	1	2	Weak
37	8.2	3	1	3	Moderate
38	33.1	3	1	2	Moderate
39	7.8	3	5	3	Strong
40	9.8	3+	1	3	Moderate
41	17.4	3+	5	2	Strong
42	1.2	3	5	4	Strong
43	7.4	3	3	3	Moderate
44	9.8	5	3	4	Strong
45	5.8	0	3	4	Strong
46	1.5	3	3	2	Moderate
47	0.5	3	1	1	Moderate
48	10.8	3	1	2	Moderate
49	1.6	3	0	3	Moderate
50	1.3	3	1	2	Moderate

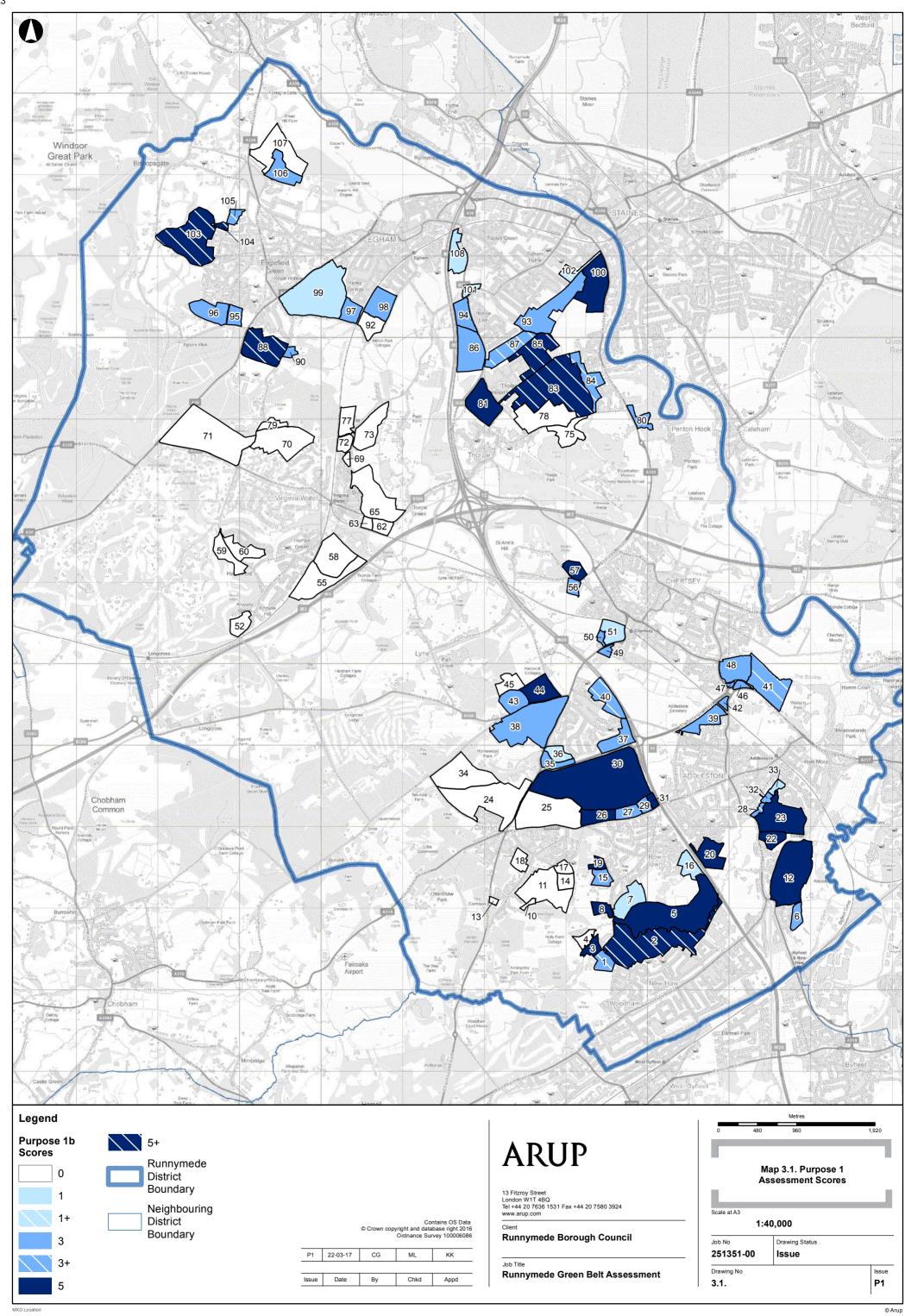
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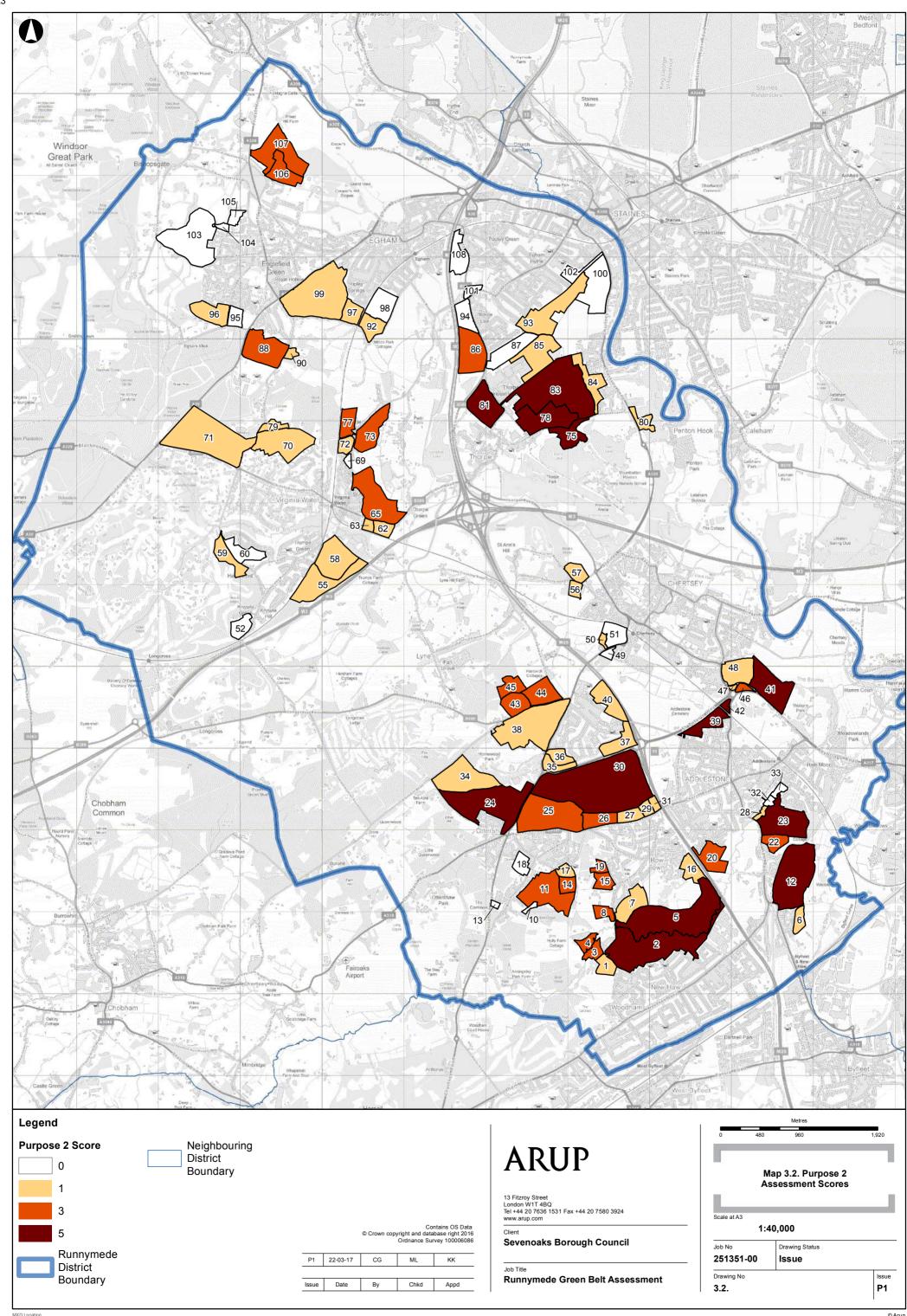
		Purpose Assessments			
Sub-	Area	Purpose 1 – To check the unrestricted	Purpose 2 – To prevent neighbouring	Purpose 3 – Assist in safeguarding the	Overall
area ref	(ha)	sprawl of large built-up areas	town from merging	countryside from encroachment	Summary
51	6.9	1	0	2	Weak
52	5.3	0	0	3	Moderate
55	17.1	0	1	3	Moderate
56	2.7	3	1	2	Moderate
57	4.6	5	1	3	Strong
58	16.9	0	1	4	Strong
59	7.4	0	1	2	Weak
60	7.4	0	0	3	Moderate
62	3.9	0	1	2	Weak
63	1.8	0	1	2	Weak
65	21.9	0	3	3	Moderate
69	1.1	0	0	1	Weak
70	20.1	0	1	3	Moderate
71	41.3	0	1	4	Strong
72	3.3	0	1	4	Strong
73	12.1	0	3	2	Moderate
75	8.5	0	5	2	Strong
77	5.9	0	3	4	Strong
78	18.1	0	5	2	Strong
79	3.1	0	1	5	Strong
80	3.9	3	1	2	Moderate
81	14.1	5	5	4	Strong
83	45.0	5+	5	3	Strong
84	9.3	3+	1	3	Moderate
85	15.4	5+	1	4	Strong
86	15.9	3	3	3	Moderate
87	11.0	3+	0	3	Moderate

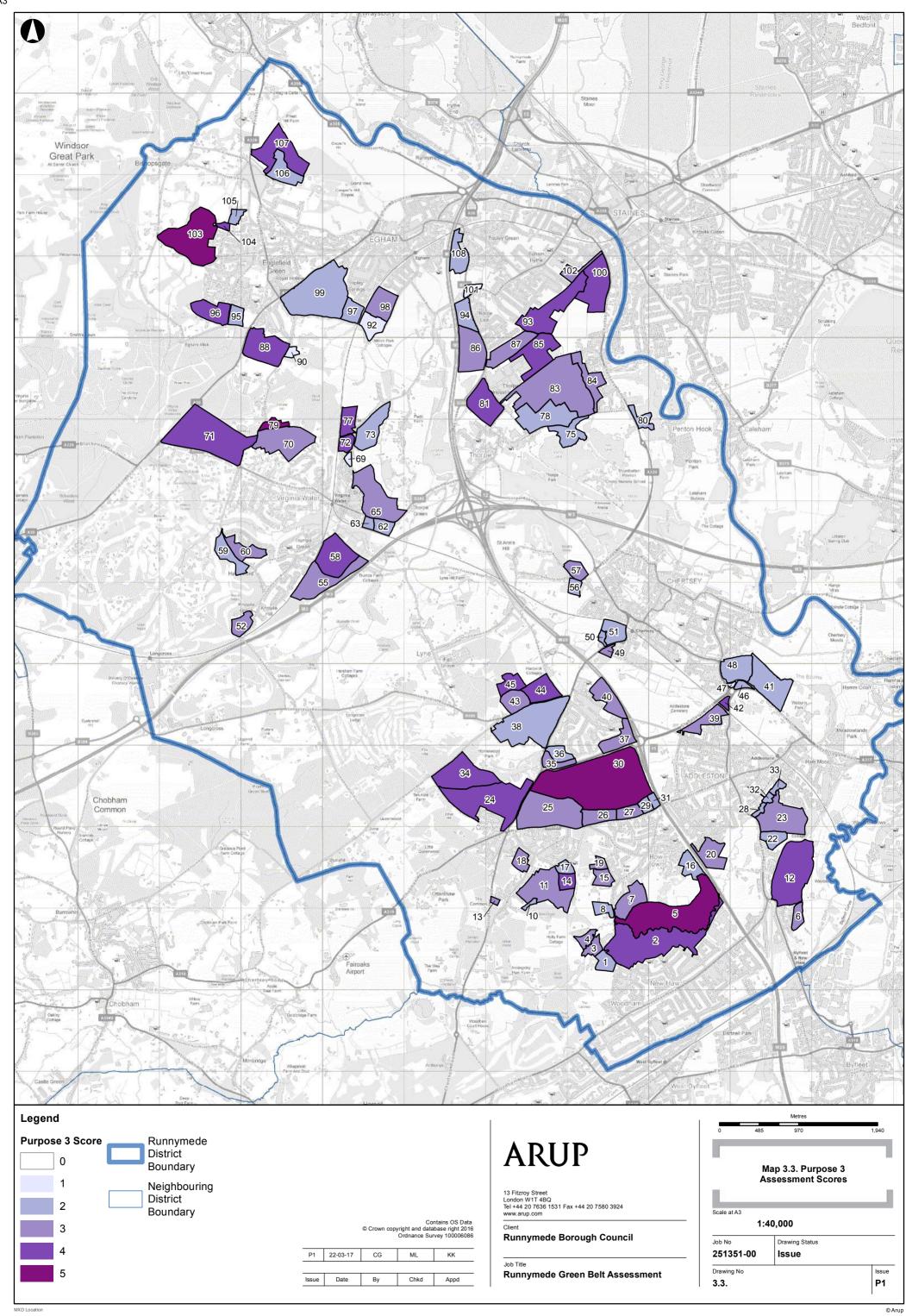
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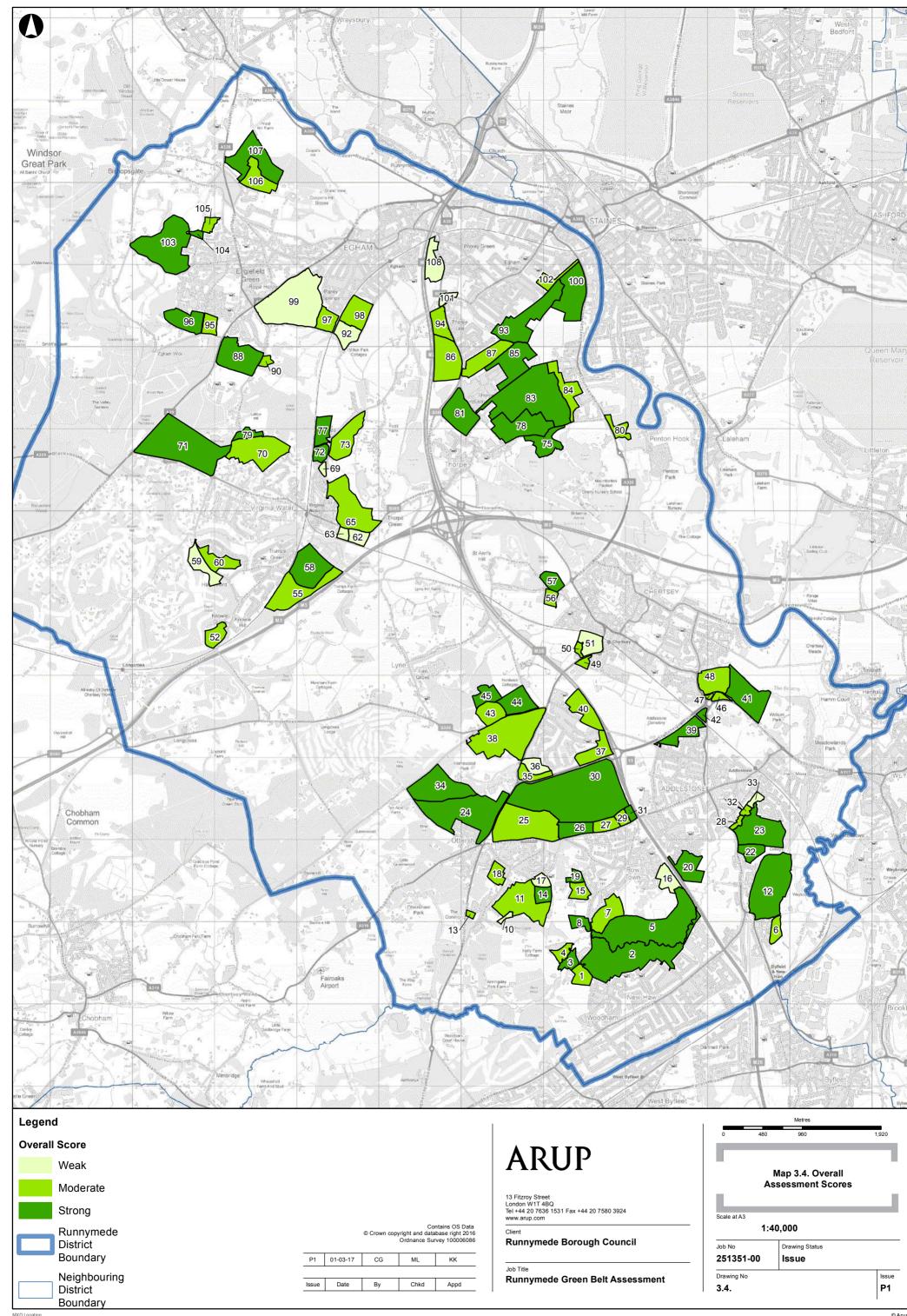
	Purpose Assessments				
Sub- area ref	Area (ha)	Purpose 1 – To check the unrestricted sprawl of large built-up areas	Purpose 2 – To prevent neighbouring town from merging	Purpose 3 – Assist in safeguarding the countryside from encroachment	Overall Summary
88	17.1	5+	3	4	Strong
90	1.6	3	1	1	Moderate
92	6.5	0	1	1	Weak
93	20.9	3	1	4	Strong
94	6.7	3	0	2	Moderate
95	3.9	3	0	2	Moderate
96	9.9	3	1	4	Strong
97	5.6	3	1	2	Moderate
98	10.1	3	0	3	Moderate
99	38.3	1	1	2	Weak
100	18.2	3	0	4	Strong
101	2.2	1	0	1	Weak
102	4.0	1+	0	3	Moderate
103	29.5	5+	0	5	Strong
104	1.2	5+	0	4	Strong
105	2.6	3+	0	2	Moderate
106	9.1	3	3	2	Moderate
107	18.4	0	3	4	Strong
108	8.4	1	0	2	Weak

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4 Recommendations

- 4.1.1 This section sets out a series of recommendations which RBC should consider in the development of the Runnymede 2035 Local Plan. These draw on both the assessments against the NPPF Purposes and of harm to the wider strategic Green Belt. Consideration of whether 'exceptional circumstances' exist to justify any alterations to the Green Belt boundary are not made, though it is anticipated that these recommendations will support the Council in developing arguments relating to the performance of smaller areas of Green Belt.
- 4.1.2 Drawing on both the GBR and GBR Part 2 findings, is clear that the majority of the Green Belt in Runnymede is performing an important role in terms of the NPPF purposes, at both the strategic level and on a smaller scale. Notwithstanding this, a number of areas have been identified which may warrant further consideration. These are categorised as follows:
 - 1. Weaker performing sub-areas/clusters Green Belt sub-areas that are weaker performing against all NPPF purposes, incorporating adjacent 'clustered' sub-areas that have particular characteristics in their own right or synergies with neighbouring weaker sub-areas which might lend themselves to further consideration.
 - 2. **Strategically less important sub-areas/clusters -** Sub-areas which, although medium scoring against the NPPF purposes, are judged to be less important to the integrity of the strategic Green Belt.
 - 3. Strategically less important sub-areas with need for mitigation Sub-areas which, although medium scoring against the NPPF purposes, could be judged as less important to the integrity of the strategic Green Belt subject to the provision of particular mitigation to limit harm to the wider Green Belt.
 - 4. **Sub-areas with scope for further sub-division -** Medium or strongly performing sub-areas where there is considered to be clear scope for further sub-division to identify weakly performing or strategically less important areas, subject to implementation of specific mitigation to ensure the presence of boundary features that are permanent and readily recognisable; these could be afforded further consideration in accordance with the above provisions.
- 4.1.3 Aside from excluding sub-areas that are judged as completely constrained by absolute constraints prior to commencing the assessment, it should also be noted that all recommended areas have been identified for further consideration based on their performance against NPPF purposes only, at a sub-area and wider strategic level. Suitability in terms of sustainability, infrastructure and wider planning considerations was not taken into account.

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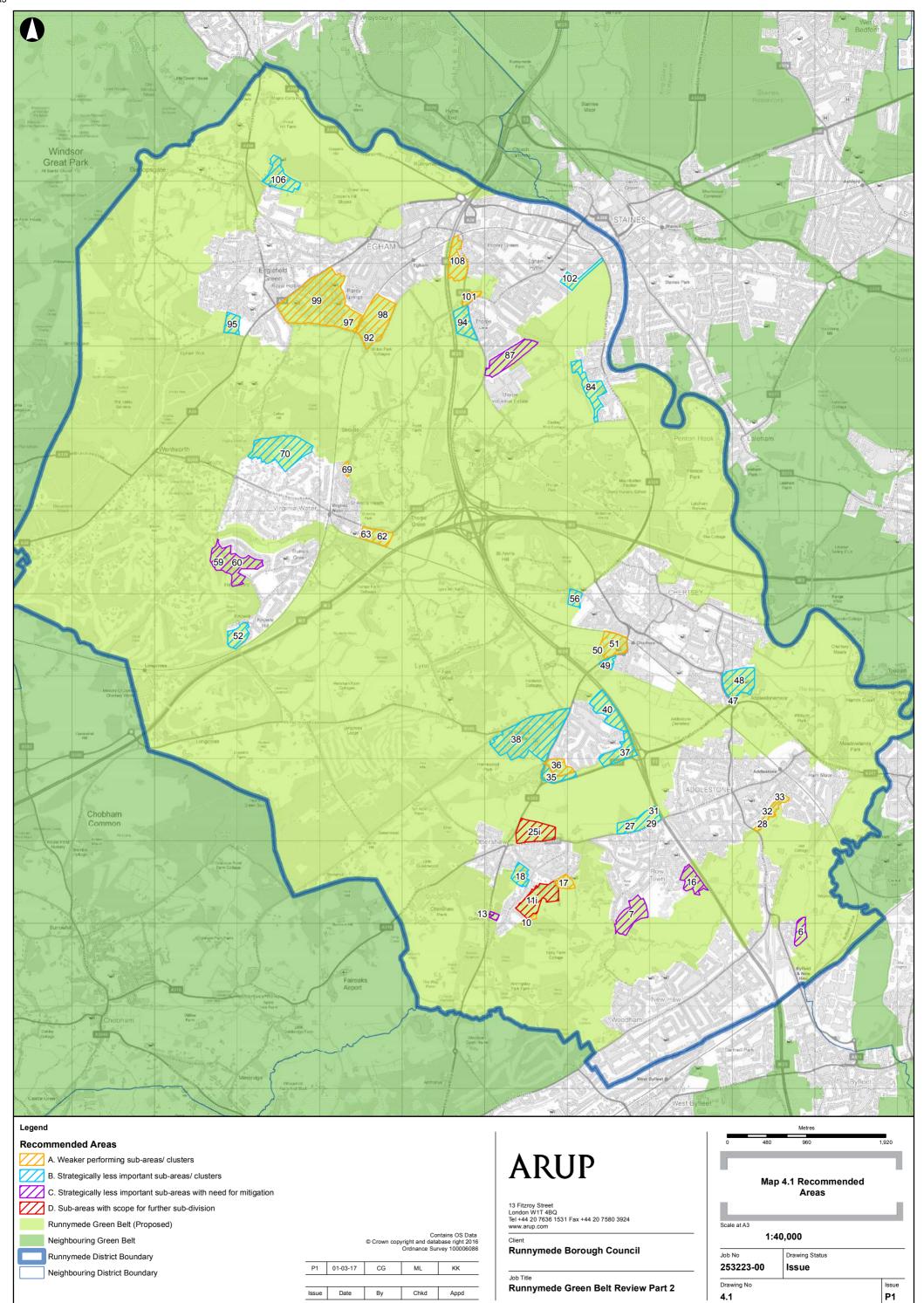
4.1.4 Table 4.1 summarises the sub-areas recommended for further consideration and the categorisation of these areas. The recommended areas are shown spatially in Map 4.1, with further detail provided in the following sections.

Table 4.1 Summary of Recommended Areas

Category	Sub-area / cluster	Approximate size (ha)
A: Weaker performing	10	0.9
sub-areas/clusters	17	2.8
	33, 28, 32	4.4
	51, 50	8.1
	36	4.4
	62, 63	5.7
	69	1.1
	92, 98	16.7
	99, 97	43.9
	101	2.2
	108	8.4
B: Strategically less	18	4.1
important sub- areas/clusters	27, 29, 31	8.5
areas/clusters	35	4.3
	37, 40	18.0
	38	33.1
	47, 48	11.2
	49	1.6
	52	5.3
	56	2.7
	70	20.1
	84	9.3
	94	6.7
	95	3.9
	102	4.0
	106	9.1
C: Weakly performing or	6	3.6
strategically less important sub-areas with need for	7	9.9
mitigation	13	0.8
9	16	5.9
	59, 60	14.8
	87	11.0
D: Sub-areas with scope	11i	20.28
for further sub-division	25i	28.5 ⁹

⁸ Size illustrates total sub-area size as assessed rather than after any potential sub division.

⁹ Size illustrates total sub-area size as assessed rather than after any potential sub division.



MXD Location

4.2 Recommended Areas

4.2.1 The following section summarises the justification for each of the Recommended Areas. Further detail of the assessments undertaken for each sub-area is provided in Annex Report 1.

A. Weaker performing sub-areas/clusters

Sub-Area 10



- 4.2.2 Sub-area 10, located to the south of Ottershaw, meets the NPPF purposes weakly, failing to meet Purposes 1 or 2 and making only a weak contribution to purpose 3. It has limited visual and perceptual links to the wider countryside and its rurality is diminished by its functional land uses, comprising a mixture of residential properties, market gardening uses, and greenhouses. While the wider Parcel within which the sub-area falls was judged as performing strongly against the NPPF Purposes in the 2014 GBR, the sub-area makes a lesser contribution and, as a result of its small scale and containment, it is judged unlikely that the loss of this sub-area would harm the integrity of the wider strategic Green Belt.
- **Recommendation:** Sub-area 10 meets the NPPF purposes weakly and could be considered further. Furthermore, the sub-area has a strong physical relationship with the adjacent sub-area 11, also recommended

for further consideration in category D; these Recommended Areas may therefore warrant joint consideration.

Sub-Area 17



- 4.2.4 Sub-area 17, located to the south-west of Ottershaw, meets the NPPF purposes weakly, failing to meet Purpose 1 and making only a weak contribution to Purposes 2 and 3. The sub-area forms a very small part of the gap between Ottershaw and Addlestone, and in terms of the settlement morphology encompasses areas already physically and functionally aligned with Ottershaw, thus not contributing to a further narrowing of the gap. Its rurality it diminished by semi-urban land uses, and furthermore there are limited connections to the wider countryside due to the severing effect of the private road to the south and strong visual links to surrounding residential uses. While the wider Parcel within which the sub-area falls was judged as performing strongly against the NPPF Purposes, the sub-area makes a lesser contribution and, as a result of its small scale and containment, it is judged unlikely that the loss of this sub-area would harm the integrity of the wider strategic green.
- **Recommendation:** Sub-area 17 meets the NPPF purposes weakly and could be considered further.

Sub-Areas 33, 28 and 32



- 4.2.6 Sub-area 33, located to the south of Addlestone, meets the NPPF purposes weakly, failing to meet Purpose 2 and making only a weak contribution to Purposes 1 and 3. The sub-area is physically enclosed by the large built up area of Addlestone, wrapped around by built-form to the north, west and partially to the east. Almost the entirety of the sub-area comprises residential properties set in grounds, and has a strong sense of functional and visual alignment with the surrounding settlement form.
- 4.2.7 Sub-areas 28 and 32, immediately abutting sub-area 33 to the south, make a similarly weak contribution to purposes 2 and 3. Although these areas score moderately against Purpose 1, they are both small in scale and strongly bounded the River Bourne to the south-east, as well as the A318 to the south-west. These features regulate the scale and form of outward growth and would check the outward sprawl of Addlestone into the wider Green Belt. Additionally, these sub-areas are intrinsically linked to the edge of Addlestone, as well as sub-area 33. As a result, despite the variance in scores, sub-areas 28 and 32 should be considered together with 33 as a cluster.
- 4.2.8 As a whole, the cluster makes a lesser contribution to the NPPF purposes than the wider Parcel in which it sits, which scored strongly against Purposes 1 and 2. As a result of its small scale, containment

and severance from wider Green Belt to the south the cluster plays a limited role with respect to the wider strategic Green Belt and its loss would not harm the overall integrity of the Green Belt.

Recommendation: Sub-area 33 performs weakly against the NPPF purposes and, together with the adjacent sub-areas 28 and 32, could be considered further.

Sub-Area 36



- 4.2.10 Sub-area 36, located to the south-west of Chertsey (Chertsey South) meets NPPF Purposes 1, 2 and 3 weakly. It is enclosed by the large built-up area of Chertsey (Chertsey South), and is visually surrounded by built form on three sides by existing residential dwellings. There is limited perceptual connection with the surrounding Green Belt due to its low lying topography, presence of dense woodland to the south and, beyond this, large infrastructure. This also reduces its sense of rurality, which is already diminished by the presence of new apartments (under construction at time of assessment). Overall, the sub-area is small in scale, particularly when considered with the scale of the overall gap between Chertsey (Chertsey South) and Ottershaw.
- **Recommendation:** Sub-area 36 meets the NPPF purposes weakly and could be considered further. Furthermore, the sub-area has a strong physical and functional relationship with the adjacent sub-area 35,

also recommended for further consideration in category B; these Recommended Areas may therefore warrant joint consideration.





- 4.2.12 Sub-area 51, located to the east of Chertsey, meets the NPPF purposes weakly, failing to meet Purpose 2 and making only a weak contribution to Purposes 1 and 3. The sub-area is enclosed by the large built-up area of Chertsey and has a weak relationship with the wider Green Belt as a result of existing development and dense planting immediately to the west. Over one third of the sub-area is covered by built form, including school buildings and associated car parking and a bowling club, and the sub-area possesses a semi-urban character.
- 4.2.13 Sub-area 50, immediately to the west, makes a similarly weak contribution to Purposes 2 and 3. Although this area scores moderately against Purpose 1, it should be noted that the Green Belt here is not open, incorporating a number of residential properties and low density structures associated with the cattery, while a stream and road immediately to the west would assist in regularising development form and restricting the scale of growth. Additionally, this sub-area is intrinsically linked to the edge of Chertsey, as well as sub-area 51. As a result, despite the variance in scores, sub-area 50 should be considered together with 51 as a cluster.

4.2.14 While the wider Parcel within which this cluster falls was judged as performing strongly against the NPPF Purposes, the sub-area makes a lesser contribution as a result of its built-up, urbanised feel, limited connection with the wider countryside and sense of containment, and it is judged unlikely that the loss of this sub-area would harm the integrity of the wider strategic Green Belt.

Recommendation: Sub-area 51 performs weakly against the NPPF purposes and, together with the adjacent sub-area 50, could be considered further.





- 4.2.16 Sub-areas 62 and 63, located to the east of Virginia Water, are directly adjacent and both meet the NPPF purposes weakly, failing to meet Purpose 1 and scoring weakly against Purposes 2 and 3. This cluster has a semi-urban character, comprising a school playing field and residential properties set in large grounds, with surrounding infrastructure further diminishing the sense of rurality. This cluster makes a similarly weak contribution to the NPPF purposes as the wider Parcel in which it sits, thus it is judged that this area makes a limited contribution with respect to the wider strategic Green Belt.
- **4.2.17 Recommendation:** Sub-areas 62 and 63 meet the NPPF purposes weakly and could be considered further.



- 4.2.17.1 Sub-area 69, located to the north-east of Virginia Water, meets the NPPF purposes weakly, failing to meet Purposes 1 and 2 and scoring very weakly against Purpose 3. The sub-area has an urban character, containing residential development, a bed and breakfast and a public house. Furthermore, it is almost entirely surrounded by development, with residential ribbon development on the east side of Stroude Green severing links to the wider Green Belt.
- 4.2.17.2 The sub-area is both physically and functionally part of the built area of Virginia Water, and plays no role as part of the wider strategic Green Belt as a result of its urban character and lack of connection to the wider Green Belt.
- **Recommendation:** Sub-areas 69 meets the NPPF purposes weakly and could be considered further.

Sub-Areas 92 and 98



- 4.2.17.4 Sub-area 92, located to the south of Egham/Englefield Green, meets the NPPF purposes weakly, failing to meet Purpose 1 and scoring weakly against Purposes 2 and 3. The sub-area is heavily built up, comprising offices, laboratories and car parking set amongst some landscape grounds. As a result of the scale of the gap and configuration of the gap between Egham/Englefield Green and Virginia Water, the sub-area is judged as making a very limited contribution to Purpose 2.
- 4.2.17.5 Sub-area 98, immediately to the north, makes a similarly weak contribution to Purpose 2. Although this area scores moderately against Purposes 1 and 3, the two sub-areas lie directly adjacent and, as a result of their similar scale and the severing effect of Whitehall Lane (which encloses both sub-areas to the east), these should be considered together as a cluster. Sub-area 98 has a contained feel, separated from the wider Green Belt by Whitehall Lane, as well as a research park to the south (sub-area 92) and the railway line to the west. These features would limit the scale of growth and regularise built-form; furthermore, they diminish the rurality of the sub-area, which has limited connection to the wider countryside.
- **4.2.17.6** Overall, the relative containment of this cluster, which is strongly bounded by durable features, and its differing character from the wider

countryside to the south and east, result in a limited contribution to the overall integrity of the wider strategic Green Belt.

4.2.17.7 Recommendation: Sub-area 92 performs weakly against the NPPF purposes and, together with the adjacent sub-area 98, could be considered further. It should be noted that, as a result of the configuration of these sub-areas, it is unlikely that 92 could be considered suitable for release in isolation from 98.

Sub-Areas 99 and 97



- 4.2.18 Sub-area 99, located to the south of Egham/Englefield Green, scores weakly against NPPF Purposes 1, 2 and 3. The sub-area, comprising much of the Royal Holloway campus, has an urban character as a result of substantial built-form. It is enclosed within the large built-up area of Egham/Englefield Green, and has relatively weak linkage with the wider Green Belt; furthermore, it makes a very limited contribution to the overall scale of the gap between Egham/Englefield Green and Virginia Water as a result of the configuration of surrounding development and the sense of containment.
- 4.2.19 Sub-area 97, immediately to the east, makes a similarly weak contribution to Purposes 2 and 3. Although this area score moderately against Purpose 1, it is small in scale and strongly bounded by Prune Hill to the south and a railway line to the east. These features regulate

the scale and form of outward growth and would check the outward sprawl of Egham/Englefield Green into the wider Green Belt. Additionally, the sub-area is intrinsically linked to the edge of the settlement, and functionally linked to adjacent sub-area 99. As a result, despite the variance in scores, sub-areas 99 and 97 should be considered together as a cluster.

- 4.2.20 The wider Parcel in which this cluster sits scored moderately against purpose 3, preventing encroachment into areas of open countryside. As a result of surrounding development, Prune Hill to the south and a steep drop in topography to the east, it is considered that the sub-area plays a limited role in preventing encroachment into the countryside, and is less important to securing the openness of broader gaps between settlements. As such, it is judged that this area makes a limited contribution to the overall integrity and performance of the wider Green Belt.
- **Recommendation:** Sub-area 99 performs weakly against the NPPF purposes and, together with the adjacent sub-area 97, could be considered further.





4.2.22 Sub-area 101, located to the west of Egham/Englefield Green, meets the NPPF purposes weakly, failing to meet Purpose 2 and scoring

weakly against Purposes 1 and 3. While it is acknowledged that the sub-area is not physically 'enclosed' by the large built-up area of Egham/Englefield Green on all sides, development immediately to the south and a very short distance to the north and north-east creates a sense of containment within the built area and results in a limited contribution to Purpose 1. The sub-area also, itself, has an urban character, comprising business units and offices. While the wider Parcel in which the sub-area sits was identified as important for preventing sprawl, it is considered that the sub-area makes little contribution to its overall strategic integrity as a result of its small scale, containment and position 'enclosed' within surrounding built form.

Recommendation: Sub-area 101 performs weakly against the NPPF purposes and could be considered further.

Sub-Area 108



4.2.24 Sub-area 108, located to the south of Egham/Englefield Green, meets the NPPF purposes weakly, failing to meet Purpose 2 and scoring weakly against Purposes 1 and 3. The sub-area is physically enclosed by the large built up area of Egham/Englefield Green, wrapped around by built-form to the north, east and west (albeit separated physically from this to the west by the M25). The sub-area has a semi-urban character, consisting of a leisure centre, residential properties and

associated car parking, interspersed with open areas of a more urban fringe character (e.g. allotments and playing fields). The sub-area is self-contained with weak linkage to the wider countryside and makes no contribution to maintaining the strategic integrity of the wider Green Belt.

Recommendation: Sub-area 108 performs weakly against the NPPF purposes and could be considered further.

B. Strategically less important sub-areas/clusters

Sub-Area 18



- 4.2.26 The sub-area, located to the west of Ottershaw, fails to meet Purposes 1 and 2 but scores moderately against Purpose 3. With respect of this purpose, the sub-area reflects the contribution of the wider strategic Parcel, preventing encroachment into an area with a largely rural character. However, given the more urban feel in the south of the sub-area and the containment of the more rural, wooded area in the north, it is judged that the sub-area plays a lesser role in maintaining the integrity of the wider strategic Green Belt.
- 4.2.27 At the strategic level, the loss of the sub-area is unlikely to harm the wider Green Belt given its small scale, containment within the existing settlement form and the configuration of existing development.

Recommendation: Sub-area 18 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.



Runnymede Borough Council



- 4.2.29 Sub-areas 27 and 29, located to the north of Addlestone (Row Town), meet the NPPF purposes moderately. These areas both score moderately against Purpose 1, with sub-area 29 also making a moderate contribution to Purpose 3. However, these areas are physically adjacent and closely aligned and should be considered together.
- 4.2.30 In both instances, the sub-areas are viewed as making a limited contribution to purpose 1 with respect to the wider strategic Parcel; in both cases, the scale of outward growth would be regulated as a result of established durable features, (established woodland, planted buffers and a stream), thus restricting sprawl. In the case of sub-area 29, this area is inward-facing and visually and physically severed from the broader, more open area of countryside to the north by an area of dense woodland. This, together with a prominent ridgeline further north, limits harm to the openness and rural character of the wider surrounding Green Belt. Both sub-areas are relatively small in scale compared with the broader sub-area in which they sit, and are judged

to be of less importance to maintaining the gap between Addlestone and Chertsey (Chertsey South).

4.2.31 Although adjacent sub-area 31 scores strongly against the NPPF purposes, specifically Purpose 1 in relation to preventing sprawl, it is judged that as a result of its intrinsic links to the two adjacent sub-areas further west, it should be additionally considered as part of this cluster. Subject to appropriate strengthening of its existing northern boundary, it is judged that its overall harm to the wider strategic Green Belt would be limited.

Recommendation: Sub-areas 27 and 29 perform moderately against the NPPF purposes, but make a lesser contribution to the overall integrity of the wider strategic Green Belt and, together with sub-area 31, could be considered further.

Sub-Area 35



4.2.33 The sub-area, located to the south-west of Chertsey (Chertsey South), meets the NPPF purposes moderately, scoring moderately against Purposes 1 and 3. Although not physically connected to Chertsey (Chertsey South), the sub-area maintains strong perceptual and functional links with the built-up area, and has a sense of containment due to being bounded by Bittams Lane, Guildford Road and St Peter's

Way, which would restrict the scale of outward growth and regulate the form of development.

4.2.34 While the sub-area's moderate contribution to Purpose 3 is noted, as a result of dense woodland around its fringes its visual and functional connection to the wider countryside is limited; this is also diminished by the presence of large infrastructure, which limits its overall contribution to the integrity of the wider strategic Green Belt.

Recommendation: Sub-area 35 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further. Furthermore, the sub-area has a strong physical and functional relationship with the adjacent sub-area 36, also recommended for further consideration in category A; these Recommended Areas may therefore warrant joint consideration.

Sub-Areas 37 and 40



- 4.2.36 Sub-areas 37 and 40 meet the NPPF purposes moderately, scoring moderately against purposes 1 and 3. They are physically adjacent and closely aligned functionally, and should therefore should be considered together.
- 4.2.37 In both instances, the sub-areas are viewed as making a limited contribution to Purpose 1 with respect to the wider Green Belt around

Chertsey. Both sub-areas are of a relatively limited scale, and furthermore the role of both the M25 and A317 as buffers to regularise growth means that the cluster fundamentally plays a lesser role in preventing the outward sprawl of Chertsey. With respect of Purpose 3, while in isolation the sub-areas plays a moderate role in preventing encroachment into the countryside, on account of their openness and rural function, it is judged that surrounding infrastructure and urbanising influences such as residential development along Bittams Lane and the M25 to the east result in a lesser contribution overall when considered as part of the wider strategic Green Belt. As a whole, the cluster performs weakly against Purpose 2, as it forms only a very small and less critical part of the gap between Chertsey and Addlestone.

Recommendation: Sub-areas 37 and 40 meet the NPPF purposes moderately, but make a lesser contribution to the overall integrity of the wider Green Belt and could be considered further.

Sub-Area 38



4.2.39 The sub-area, located to the west of Chertsey (Chertsey South), meets Purposes 2 and 3 weakly, but scores moderately against Purpose 1. The wider parcel was identified as performing strongly against Purpose 3, preventing encroachment into a broader area of open, unspoilt countryside. However, as a result of its semi-urban character

and particularly high proportion of built-form, it is judged that it makes a limited contribution to this purpose, both locally and in terms of the wider strategic Green Belt (given its relatively high level of self-containment). Additionally, while the sub-area makes up a sizeable part of the wider gap between Chertsey (Chertsey South) and Lyne, it is judged that it makes a lesser contribution in strategic terms as a result of its lack of openness and strong functional alignment with the wider settlement of Chertsey. The highly developed and self-contained feel of the sub-area also diminish its overall contribution to Purpose 1 at the strategic scale.

- 4.2.40 Overall, it is judged that this area plays a limited role with respect to the wider strategic Green Belt and its loss would not harm the integrity of surrounding Green Belt.
- **4.2.41 Recommendation:** Sub-area 38 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.

Sub-Areas 47 and 48



4.2.42 Sub-areas 47 and 48, located to the south of Chertsey, meet the NPPF purposes moderately. These areas both score weakly against Purposes 2 and 3, but moderately against Purpose 1. These areas are physically adjacent and closely aligned and should be considered together.

- 4.2.43 Both of the sub-areas are, in a functional and visual sense, intrinsically aligned with the edge of Chertsey. It should be noted that the Green Belt here has a semi-urban feel with a diminished sense of openness, incorporating a former school, football club and playing fields north of Addlestone Moor (sub-area 48), and residential properties to the south (sub-area 49). These sub-areas are also strongly defined by defensible, readily recognisable features which limit the scale of 'growth' and regulate the form of development, thus checking sprawl and limiting potential harm to the integrity of the wider strategic Green Belt to the east and south (Purpose 1).
- 4.2.44 Overall, it is judged that this cluster plays a limited role with respect to the wider strategic Green Belt and its loss would not harm the integrity of surrounding Green Belt.
- **Recommendation:** Sub-areas 47 and 48 perform moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further. It should be noted that, as a result of the configuration of these sub-areas, it is unlikely that 47 could be considered suitable for release in isolation from 48.



- 4.2.46 The sub-area, located to the east of Chertsey, meets the NPPF purposes moderately, scoring moderately against Purposes 1 and 3. While the wider strategic Parcel was identified as strongly performing against Purposes 1, 2 and 3, the sub-area performs a lesser role than this broader area. In strategic terms, the sub-area does not form part of the gap between Chertsey and Addlestone as a result of its small scale, containment and relationship to surrounding development (Purpose 2). Additionally, the sub-area plays a lesser role in preventing the outward growth of Chertsey, which would be limited in scale and contained by durable features with no harm to the integrity of the wider Green Belt (Purpose 1). Although the sub-area is largely free from development, its self-contained feel and visual relationship with Chertsey Recreation Ground to the north limits any connection with the wider countryside, thus its strategic contribution to preventing encroachment (Purpose 3).
- 4.2.47 Overall, it is judged that this area plays a limited role with respect to the wider strategic Green Belt and its loss would not harm the integrity of surrounding Green Belt.
- **4.2.48 Recommendation:** Sub-area 49 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.





4.2.49 The sub-area, located to the south-west of Virginia Water, fails to meet Purposes 1 and 2 but scores moderately against Purpose 3. With respect to this purpose, it should be noted that its scale and sense of containment limit its role in terms of the wider strategic Green Belt. Development wraps around the sub-area to the north, east and south, and a dense wooded buffer to the west limits visual and physical linkage to the wider Green Belt.

- 4.2.50 Overall, it is judged that this area plays a limited role with respect to the wider strategic Green Belt and its loss would not harm the integrity of surrounding Green Belt.
- **Recommendation:** Sub-area 52 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.

Sub-Area 56



4.2.52 The sub-area, located to the north-west of Chertsey, scores weakly against Purposes 2 and 3, but moderately against Purpose 1. While the sub-area performs moderately against Purpose 1, it should be noted that the scale and form of outward growth would be restricted by the dense woodland and ridgeline immediately to the west; furthermore, in terms of outward growth, it is judged that this would be a natural

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area and strongly aligned with the Council's reserve housing site to the south-east.

- 4.2.53 Overall, it is judged that this area plays a limited role with respect to the wider strategic Green Belt and its loss would not harm the integrity of surrounding Green Belt.
- **Recommendation:** Sub-area 56 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.

Sub-Area 70



- 4.2.55 The sub-area, located to the north of Virginia Water, scores moderately against Purpose 3. While the sub-area reflects the general character and openness of much of the wider parcel, it is judged that the configuration of development around its fringes, as well as its relationship with the surrounding settlement form, means that it is less integral to the wider Green Belt in strategic terms. Hollow Lane to the north, as well as development form and dense planting along this edge, contribute to a sense of containment and severance from the wider countryside.
- 4.2.56 As a result, it is judged that this area plays a limited role with respect to the wider strategic Green Belt and its loss would not harm the integrity of surrounding Green Belt.

4.2.56.1 Recommendation: Sub-area 70 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.

Sub-Area 84



4.2.57 The sub-area, located to the south-west of the Egham/Englefield Green large built up area (which includes part of Staines), scores weakly against Purpose 2, but moderately against purposes 1 and 3. While the sub-area prevents the outward growth of the Egham/Englefield Green large built-up area, it is strongly bounded to the west by watercourses and lakes. These would limit the scale of growth and regulate the form of development. Furthermore, as a result of the existing configuration of development, this would not represent a substantial scale of expansion. Strategically, the sub-area makes a lesser contribution to maintaining the gap between Egham/Englefield Green and Thorpe as a result of its relatively small scale and limited visual and physical connection to the Green Belt further west (Purpose 2). Furthermore, while the sub-area has a largely rural character as a result of its openness, as a result of its disconnection from the wider Green Belt and the presence of surrounding visually prominent urbanising influences it makes a limited contribution to preventing encroachment into the countryside versus the wider strategic parcel further west.

4.2.58 Overall, it is judged that this area plays a limited role with respect to the wider strategic Green Belt and its loss would not harm the integrity of surrounding Green Belt.

4.2.59 Recommendation: Sub-area 84 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.

Sub-Area 94



- 4.2.60 The sub-area, located to the south-west of Egham/Englefield Green, scores weakly against Purpose 3, but moderately against Purpose 1. The sub-area is is strongly bounded and self-contained, with weak linkage with the wider Green Belt. It is of a small scale and subject to existing development, and strongly bounded by New Wickham Lane, Clockhouse Lane East and the M25, which restrict the scale of outward growth and regularise the form of development.
- 4.2.61 As such, it is judged that this area plays a limited role in respect of the wider strategic Green Belt and its loss would not harm its overall integrity.
- **4.2.62 Recommendation:** Sub-area 94 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.



- 4.2.63 The sub-area, located to the south of Egham/Englefield Green, scores very weakly against Purpose 3, but moderately against Purpose 1. With respect to this purpose, it should be noted that the sub-area is of a very small scale and strongly bounded by Wick Road to the south, Blay's Lane to the west and a private access road to the east. This area has a sense of separation from the wider countryside. The sub-area is already predominantly built-up, with development to the north and in close proximity to the east and a wooded area to the south.
- 4.2.64 As such, it is judged that this area plays a limited role in respect of the wider strategic Green Belt and its loss would not harm its overall integrity.
- **4.2.65 Recommendation:** Sub-area 95 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.



- 4.2.66 The sub-area, located to the south of Egham/Englefield Green, scores moderately against Purpose 3. While the sub-area is completely free of development, its configuration is such that it is highly influenced by the urban edge. Comprising playing fields in the west and wooded areas and scrubland in the east, the sub-area is visually linked to the edge of the settlement to the north, with development wrapping around much of the western part of the sub-area. This is distinct from the wider open countryside, and visually separated from this area by dense planting along its southern boundary.
- 4.2.67 As such, it is judged that this area plays a limited role in respect of the wider strategic Green Belt and its loss would not harm its overall integrity.
- **Recommendation:** Sub-area 102 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.



- 4.2.69 The sub-area, located to the north of Egham/Englefield Green, scores moderately against Purposes 1 and 2. While at the sub-area scale the sub-area plays a moderate role in preventing the outward sprawl of Egham/Englefield Green, dense woodland, which wraps around much of the sub-area, plays a critical role in limiting the scale of growth and regularising the form of potential development. The sub-area also scores more strongly against Purpose 2 at the local level; this is due to visibility towards Old Windsor arising from topographical changes, but most of the site is already built out, thus the perceptual distance between the settlements would not be reduced. The western portion of the sub-area is built-out right up to the boundary with the wider Green Belt, while the eastern portion is more open with largely recreational uses; however, this has a stronger sense of enclosure from surrounding built form and heavily wooded areas.
- 4.2.70 Therefore, while the sub-area scores moderately overall, existing mitigating physical features reduce any risk of harm to the overall Green Belt.
- **Recommendation:** Sub-area 106 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt and could be considered further.

C. Weakly performing or strategically less important sub-areas/clusters with need for mitigation

Sub-Area 6



- 4.2.72 The sub-area, located to the east of New Haw/Woodham/Byfleet, meets the NPPF purposes moderately, scoring moderately against Purposes 1 and 3. However, as a result of the electric sub-station to the south and dense planting along the eastern edge, as well as residential properties which wrap around to the west, there is a sense of disconnect from the wider countryside. In terms of the wider strategic Green Belt, it is judged that the sub-area makes a limited contribution in terms of its overall openness and integrity (Purpose 3). Furthermore, the sub-area is relatively small in scale, and the presence of the aforementioned durable features mean that the extent of outward growth would be limited and the form of development regulated, thus limiting the sub-area's contribution to Purposes 1 and 2 in a more strategic sense.
- 4.2.73 It is acknowledged that Wey Manor Road provides limited screening from the wider countryside along a small section of the northern boundary. Thus, in order to limit the visual impact on the wider countryside and mitigate harm to the wider Green Belt, it is suggested that the existing fragmented planted features are subject to significant

strengthening. Subject to this mitigation, it is judged that the loss of the sub-area would not harm the wider Green Belt, as a result of its limited scale and alignment with the existing settlement to the west.

Recommendation: Sub-area 6 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt. Subject to mitigation along its northern boundary, it could be considered further.

Sub-Area 7



4.2.75 Overall, the sub-area, located to the south of Addlestone (Row Town), scores weakly against Purposes 1 and 2, but moderately against Purpose 3. As a result of residential development wrapping around to the north, east and west, much of the sub-area has a more enclosed feel and makes a lesser contribution to preventing sprawl. The integrity of the broader, open gap to the south would remain in-tact as a result of the relative separation of this area from the wider Green Belt in visual terms. While the sub-area scores moderately against Purpose 3 as a result of its strong openness, the northern part of the sub-area has a limited connection to the wider Green Belt further south as a result of its sense of containment by surrounding development and low lying topographical position, which limits is visual connection to the wider countryside.

- 4.2.76 However, it should be noted that, while much of the sub-area plays a limited role with respect to the integrity of the wider Green Belt, a small area in the extreme southern part extends south of the existing settlement extent of Addlestone (Row Town) and thus plays a more critical role. This area protrudes outwards into the countryside and prevents further ribbon development along Row Town that would perceptually reduce the scale of the gap between Addlestone (Row Town) and Woodham. Additionally, although topography plays some role in restricting visibility between the sub-area and the wider Green Belt, the access road and fragmented planted buffer along the southeastern boundary could be strengthened further to increase its robustness and establish a more recognisable boundary.
- **4.2.77 Recommendation:** Sub-area 7 performs moderately against the NPPF purposes. Much of the sub-area makes a lesser contribution to the overall integrity of the wider strategic Green Belt and may be suitable for further consideration. However, this would require mitigation to improve the durability of the south-eastern boundary. Additionally, it is recommended that the Council maintains the openness of the southernmost tip of the sub-area, which extends beyond the existing settlement extent of Row Town. It is suggested that this could be achieved through:
 - Removal of the whole area, as identified, from the Green Belt and the creation of specific Local Plan policies to maintain this area as open space;
 - Retention of the southernmost tip in the Green Belt and the creation of a new Green Belt boundary further to the north, through strengthening of existing remnant landscape features or a new man-made feature.

Sub-Area 13



- 4.2.78 Sub-area 13, located to the west of Ottershaw, scores moderately against the NPPF purposes overall. As a result of its very small scale and lack of physical or perceptual connection to any large built-up area, it does not meet purposes 1 or 2. It scores moderately against Purpose 3 as a result of its high level of openness and rural function as paddocks. However, in terms of the wider strategic Green Belt, it makes a lesser contribution as a result of surrounding urbanising influences and its strong sense of enclosure from dense woodland to the south, and the A320 to the west.
- 4.2.79 While the loss of this area would not impact on the integrity of the wider Green Belt, it is judged that parts of the northern boundary may require additional boundary to ensure their permanence and durability. Alternatively, it is suggested that the Council may wish to consider, in conjunction with this sub-area, a wider area as far north as Sunnyside (including the existing caravan site), which has a limited sense of openness.
- **4.2.80 Recommendation:** Sub-area 13 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt. Subject to mitigation to improve the durability of its northern boundary, or consideration together with a broader area of Green Belt to the north, it could be considered further.

Sub-Area 16



- 4.2.81 The sub-area, located to the south of Addlestone (Row Town), performs weakly against the NPPF purposes. The sub-area is enclosed by the existing settlement form to the north and west and severed from the wider Green Belt to the east by the M25, thus limiting its contribution to preventing sprawl at the wider strategic level. Its small scale and predominant sense of separation from the wider Green Belt to the south also limits its role as part of the essential gap between Addlestone and New Haw/Woodham/Byfleet. The rurality is diminished by urbanising influences in the form of residential development to the north and north-west, as well as the M25 immediately to the east; this is further reduced by the cluster of structures associated with the Animal and Plant Health Agency.
- 4.2.82 The loss of the northern part of the sub-area would not significantly harm the wider Green Belt, as it would form infill development, and would not erode the wider gap. However, currently, the southern boundary itself is not readily recognisable and it is judged that this would require strengthening to limit harm to the wider Green Belt.
- **4.2.83 Recommendation:** Sub-area 16 performs weakly against the NPPF purposes and subject to mitigation along its southern boundary to limit harm to the wider Green Belt, it could be considered further.

Sub-Areas 59 and 60



- 4.2.84 Sub-area 59, located to the west of Virginia Water, meets the NPPF purposes weakly, failing to meet Purpose 1 and scoring weakly against Purposes 2 and 3. It is of a small scale in comparison with the much larger, less essential gap between Virginia Water and Sunningdale, and has a semi-urban character as a result of residential properties set along Wellington Avenue.
- 4.2.85 Sub-area 60, immediately to the east, makes a similarly weak contribution to Purposes 1 and 2. Although this area scores moderately against Purpose 3, the two sub-areas lie directly adjacent, share largely similar characteristics and are of a similar small scale. Furthermore, aside from the connection to sub-area 59, the sub-area is otherwise physically severed from the wider Green Belt. These sub-areas should therefore be considered together as a cluster.
- 4.2.86 This cluster makes a similarly weak contribution to the NPPF purposes as the wider Parcel in which it sits, thus it is judged that this area makes a limited contribution with respect to the wider strategic Green Belt. It should be noted however that, as a result of 'softer' features along the western edge of sub-area 59 which are not immediately recognisable, further strengthening of this boundary to enhance its permanence and durability would be necessary in order to limit harm to the wider Green Belt.

Recommendation: Sub-area 59 performs weakly against the NPPF purposes. Subject to mitigation along its western boundary to limit harm to the wider Green Belt, this area could considered further together with the adjacent sub-area 60.

Sub-Area 87



- 4.2.88 Sub-area 87, located to the south of Egham/Englefield Green (Egham Hythe), performs moderately against Purposes 1 and 3. However, as a result of its enclosure by existing natural features, including dense woodland and, beyond this, Mead Lake, the scale of any outward growth would be limited and the extent of built-form regularised. Furthermore, the sub-area is set in-between two inset areas, Egham Hythe to the north and Thorpe Industrial Estate to the south. It is judged that these areas are functionally and visually linked and effectively form part of the same large built-up area, thus the role of this area in preventing sprawl is limited. While the sub-area and wider strategic Parcel are both considered to be largely rural in character, the sub-area is largely contained by built-form, thus diminishing its rurality and connection to the wider countryside. Any harm to the integrity of the wider Green Belt would be limited by this sense of enclosure.
- 4.2.89 It is judged that, overall, the sub-area plays a limited role in terms of the integrity of the wider strategic Green Belt. However, its southern

boundary (east of the Thorpe Business Park) is less strongly defined, and while much of the sub-area is contained it is judged that further strengthening of this boundary may be necessary to prevent any sense of sprawl and limit harm to the wider Green Belt.

4.2.90 Recommendation: Sub-area 87 performs moderately against the NPPF purposes, but makes a lesser contribution to the overall integrity of the wider strategic Green Belt. Subject to mitigation to improve the durability of its southern boundary, it could be considered further.

D. Sub-areas with scope for further sub-division

Sub-Area 11i



- 4.2.91 Sub-area 11i comprises the western part of sub-area 11. As a whole, sub-area 11 scores moderately against Purposes 2 and 3. It contributes to maintaining the general extent and openness of the gap between Ottershaw and Addlestone (Row Town), which further east is fragmented as a result of existing built-form. Additionally, the southeastern part of the sub-area has a particularly unspoilt, rural character and a stronger sense of remoteness.
- 4.2.92 However, the western part of the sub-area, 11i, has a more limited connection to the wider countryside and its rurality is diminished by visually prominent residential development at the edge of Ottershaw,

which wraps around to the west and south-west; existing residential development in the north-east further reduces linkage with more open, rural areas to the south-east (Purpose 3). In terms of the wider strategic Green Belt, the loss of this area would not reduce the overall scale of the gap between the settlements, particularly given the existing residential development along Bousley Rise (Purpose 2).

- 4.2.93 It is judged that, overall, sub-area 11i plays a limited role in terms of the integrity of sub-area 11 and the wider strategic Green Belt. However, it should be noted that, in order to limit harm to the wider Green Belt, part of its eastern boundary (aligned with the existing public footpath) would require substantive strengthening to increase its durability and permanence, and additionally limit visual impacts to the more open, rural areas to the east.
- **Recommendation:** Sub-area 11i makes a lesser contribution to the NPPF purposes than the wider sub-area 11, and furthermore makes a lesser contribution to the overall integrity of the wider strategic Green Belt. Subject to mitigation to improve the durability of its eastern boundary, it could be considered further.

Sub-Area 25i



4.2.95 Sub-area 25i comprises the south-western part of sub-area 25. While the wider strategic Parcel was identified as maintaining the essential

gaps between Addlestone and Chertsey, and Chertsey and Ottershaw, sub-area 25 plays a lesser role (Purpose 2). Similarly, it does not fully represent the unspoilt rural characteristics demonstrated across the wider parcel (Purpose 3). However, it is judged that, broadly, there is a varying role between the northern/eastern and southern/western parts of the sub-area. While the northern/eastern part is judged to be sensitive in terms of the overall strategic Green Belt as a result of its openness and strong visual connection with the wider countryside, it is judged that a small area in the south-west, sub-area 25i, plays a lesser role in strategic terms.

- 4.2.96 As a result of topography (a ridgeline along the northern boundary), as well as the more urbanised character of this area as a result of built-form and surrounding urbanising influences, it plays a diminished role in preventing encroachment into the countryside and is less fundamental to the openness of the broader gaps between settlements. As such, subject to mitigation (including establishing a more robust northern boundary), it is judged that the loss of this area would have lesser harm to the wider strategic Green Belt.
- **Recommendation:** Sub-area 25i makes a lesser contribution to the NPPF purposes than the wider sub-area 25, and furthermore makes a lesser contribution to the overall integrity of the wider strategic Green Belt. Subject to mitigation to improve the durability of its northern boundary, it could be considered further.

4.3 Green Belt Boundary Amendments

- 4.3.1 Taking into account the broad observations made on the strength and regularity of Green Belt boundaries (see Annex Report 1), as well as the specific recommendations made through this review regarding mitigation, the boundaries adopted as part of any adjustments to the Green Belt should be kept under review as part of the ongoing development of the new Local Plan.
- 4.3.2 When reconsidering boundaries, it is recommended that the Council adopt the following principles:
 - Boundaries should be based on man-made or natural physical features where, as a result of factors such as scale, magnitude or planning policies or designations, there is a strong likelihood of permanence;
 - In line with the broad principles outlined in the Methodology, features might include:
 - Motorways and roads (both public and private);
 - Railway lines;
 - Rivers, brooks, and other smaller water features, including streams and canals;
 - Prominent physical features (e.g. ridgelines);

- Existing or future development with strongly established, regular and consistent boundaries;
- Protected woodland;
- Established planted features, including hedgerows.
- Boundaries should be readily recognisable, ideally both on plan and visually on the ground;
- Where remnant or degraded features exist (e.g. remains of historic hedgerows), the potential to restore / replace these features should be explored where possible to secure and enhance the character of the landscape;
- In identifying new Green Belt boundaries, consideration should be given to the visual impact of a potential release on the wider Green Belt and, where appropriate, suitable mitigation identified to limit this impact (e.g. increasing the density of planted buffers to shield development from the wider countryside where this complements and enhances landscape character and setting and does not introduce further adverse impact);
- Consideration should be afforded to the creation of new boundaries as part of future development, and how the creation of robust features might be obligated through Local Plan site-specific and development management policies.

5 Conclusion

- This Study has examined the performance of 94 sub-areas against the Green Belt purposes, as set out in the NPPF. These were identified by considering the interaction between the Council's promoted development sites and a series of distance buffers, which were applied to the Borough's identified Town Centres, Key Service Centres and Local Service Centres. Where practicable, site boundaries were adjusted to align with durable man-made and physical features, thus producing the sub-areas for assessment. Sub-areas completely or almost completely covered by absolute constraints were excluded from further assessment.
- The GBR noted the ongoing importance of the Green Belt in Runnymede as part of the wider Metropolitan Green Belt, preventing urban sprawl and merging of settlements and ensuring the provision of open countryside for the enjoyment of all. It identified that the majority of the land exhibits openness and a low level of built development, which are considered key characteristics of Green Belt.
- 5.1.3 The approach for the GBR Part 2 has drawn upon these key observations, adapting and expanding the specifics of the assessment to reflect the more focused, granular assessment of Green Belt around the Borough's settlements, whilst remaining consistent with the overarching principles of the GBR. Crucially, while the GBR Part 2 has assessed considerably smaller areas, its recommendations are underpinned by explicit consideration of the role and function of the Green Belt at the wider, strategic level to ensure consistency.
- Many of the sub-areas assessed through this Study, (38 out of 94, or 40%), continue to perform one or more of the NPPF purposes strongly, while all sub-areas meet the purposes to a greater or lesser extent. However, reflecting the rather fragmented state of the Green Belt around many of the Borough's settlements, the Study has identified 14 sub-areas that only meet the Purposes weakly. These have been recommended for further consideration by the Council, in some instances together with adjacent sub-areas where judged logical and in line with broader principles around limiting harm to the wider Green Belt.
- Additionally, as part of this Study, further assessment has been undertaken to consider the contribution of moderately performing subareas to the integrity of the wider strategic Green Belt. This has considered the role of the sub-area within the context of the strategic parcels identified in the GBR, and the potential for harm to the function of the wider Green Belt if such sub-areas were removed. This assessment has identified a number of additional Recommended Areas for further consideration by the Council, including whole sub-areas, 'clusters' of sub-areas and two instances where sub-areas could be further sub-divided to identify weaker areas.

- 5.1.6 While these Recommended Areas are distributed across the Borough, they generally comprise distinct areas of Green Belt which are relatively small in scale, possessing semi-urban characteristics and located adjacent to or even enclosed within urban areas, thus performing little or no role in preventing the outward sprawl of large built-up areas, the coalescence of settlements or encroachment into the countryside.
- 5.1.7 Notably, Recommended Areas have been identified for further consideration based on their performance against NPPF purposes only, at the local and strategic scales, rather than their suitability in terms of sustainability, infrastructure and wider planning considerations. These findings will therefore need to be balanced against the findings of other technical work and the Council's broader spatial vision as part of the wider site selection process. The recommendations set out in this Study will not automatically lead to the release of land from the Green Belt. Ensuring maximum protection for the Green Belt, in line with national policy, continues to be a core planning principle in the formulation of Local Plan policy. Further decision making by the Council in updating the Local Plan will determine which areas, if any, might be released from or added to the Green Belt. This GBR Part 2 will ultimately form part of a suite of evidence, which will be used to inform the plan-making process.
- 5.1.8 The Council will also need to carefully consider whether, in accordance with the NPPF, whether there are any 'exceptional circumstances' that justify the Green Belt boundary in the Borough to be altered through the preparation of the new Local Plan. At that time, the Council will need to consider the definition of new Green Belt boundaries, taking into account the principles set out in this Study and having regard to their intended permanence in the long term, so that any proposed boundaries are capable of enduring beyond the plan period.