

# **NUTFIELD GREEN PARK**

**GREEN BELT ASSESSMENT ADDENDUM**

**MARCH 2025**

FPCR | environment  
& design



## GREEN BELT ASSESSMENT ADDENDUM

Client

Nutfield Park Developments Ltd

Project

Nutfield Green Park

Date

31 March 2025

## CONTENTS

1.0	INTRODUCTION .....	1
2.0	NATIONAL PLANNING POLICY FRAMEWORK.....	1
3.0	GREEN BELT ASSESSMENT.....	1
4.0	WHETHER THE SITE SHOULD BE CLASSIFIED AS GREY BELT .....	3
5.0	SUMMARY AND CONCLUSIONS.....	7

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## 1.0 INTRODUCTION

- 1.1 This Green Belt Assessment Addendum has been carried out for Nutfield Green Park by FPCR Environment and Design Ltd (FPCR). The purpose of this Addendum is to outline updates to the submitted Landscape and Visual Appraisal and Green Belt Assessment 10 October 2023(FPCR).
- 1.2 This addendum outlines any updates in assessment relating to Green Belt in the context of the NPPF (December 2024) and updates to the PPG February 2025, which has been published since the application was submitted.
- 1.3 This addendum should be read in conjunction with Landscape and Visual Appraisal and Green Belt Assessment October 2023 (FPCR).

## 2.0 NATIONAL PLANNING POLICY FRAMEWORK

- 2.1 The National Planning Policy Framework was updated on the 12<sup>th</sup> December 2024. (NPPF 2024).
- 2.2 The NPPF 2024 has no direct impact on the Landscape and Visual Appraisal aspects of the submitted Landscape and Visual Appraisal and Green Belt Assessment October 2023, or the judgements made as part of the appraisal process.
- 2.3 However, as part of the NPPF 2024 updates, Green Belt policy has been reviewed and there are a number of changes relating to the assessment of Green Belt. Updates to the NPPG were also published in February 2025, relating to Green Belt matters including grey belt. These are discussed further in the following Green Belt section.

## 3.0 GREEN BELT ASSESSMENT

- 3.1 The updated NPPF (December 2024) sets out a number of changes to Green Belt with the introduction of the concept of grey belt. This is defined as:

*'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.' 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. (Annex 2 Glossary).*

- 3.2 This addendum report assesses the role of the site against Green Belt purposes, a, b and d. The consideration of other matters pertaining to grey belt is covered in the Planning Statement Addendum prepared by HGH Consulting.
- 3.3 The NPPF (December 2024) was further updated with some minor clarificatory amendments in February 2025, specifically in relation to paragraph 155:

*'The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply: a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.'*

- 3.4 This addendum also addresses whether the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

## National Planning Practice Guidance

3.5 National Planning Practice Guidance (NPPG), supplements the NPPF with guidance. An update to the guidance was released 27th February 2025. It sets out some of the factors that should be taken into account when considering the potential impact of development on Green Belt land and identifying grey belt land.

3.6 The NPPG guidance sets out:

- *"the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land"*
- *"the considerations involved in determining whether release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;"*
- *"guidance for considering proposals on potential grey belt land"*
- *"guidance on identifying sustainable locations when considering the release or development of Green Belt land"*
- *"updated guidance on how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, should contribute to accessible green space"*
- *"updated guidance on how to consider the potential impact of development on the openness of the Green Belt".*

3.7 Under a section titled '*Assessing Green Belt to identify grey belt land*' the NPPG notes:

*"This guidance is relevant to those authorities performing a review of Green Belt boundaries to meet housing or other development needs (either prior to or as part of the plan making process), those authorities otherwise required to determine whether land constitutes grey belt in decision making, and others seeking to identify grey belt land."*

3.8 At Paragraph 001 it continues:

*"Where land is identified as grey belt land, any proposed development of that land should be considered against paragraph 155 of the NPPF, which sets out the conditions in which development would not be inappropriate on grey belt land".*

3.9 A series of tables are set out at Paragraph 005, illustrating features that are likely to be noted against a 'Strong', 'Moderate' or 'Weak/None' contribution to Green Belt purposes a, b, and d.

- Purpose A - to check the unrestricted sprawl of large built up areas
- Purpose B - to prevent neighbouring towns merging into one another
- Purpose D - to preserve the setting and special character of historic towns

3.10 For brevity, the illustrative text descriptions are not reproduced here but are referenced in the following section.

3.11 This addendum report also assesses whether the proposed development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.

#### 4.0 WHETHER THE SITE SHOULD BE CLASSIFIED AS GREY BELT

4.1 The first stage of this test is to assess whether the site does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143, the Green Belt purposes.

4.2 The submitted Landscape and Visual Appraisal and Green Belt Assessment October 2023 (FPCR) provided background on the role of land within the Green Belt. This assessment provided commentary on the Tandridge District Council Green Belt Assessment December 2015 - Main Report. This report included Nutfield and the application site within a large assessment parcel, described as GB 28. This area is shown below

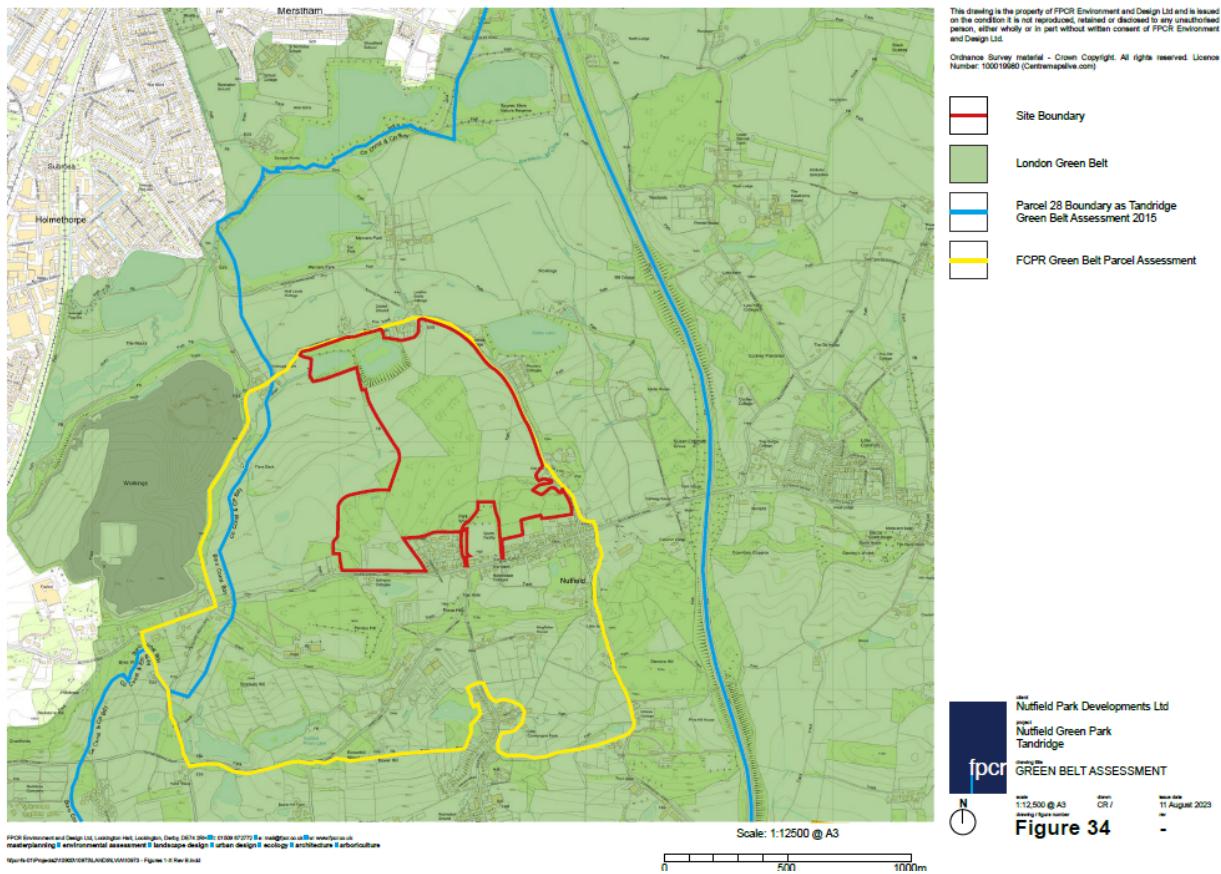


4.3 The NPPG sets out how local authorities should define land to be assessed within Green Belt assessment. It notes

*"The number and size of assessment areas can be defined at a local level and respond to local circumstances. However, the following principles will need to be considered."*

4.4 It then goes on to identify that a small number of large assessment areas will not be appropriate in most circumstances, and that assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes.

4.5 The FPCR assessment October 2023, assessed a more granular assessment area. This is shown below, identified in yellow.



#### Purpose A - to check the unrestricted sprawl of large built up areas

4.6 The FPCR assessment concluded that the land parcel as a whole, lies away from large built-up areas. Smaller built-up areas at Nutfield and south Nutfield exist within or at the edge of the parcel and these are separated by topography and woodland, maintain separate identities, and limit the influence of built development. Overall, it is considered the parcel plays no role in restricting the sprawl of large built up areas.

4.7 For the evaluation of Green Belt, the NPPG clarifies that purpose A, “*relates to the sprawl of large built up areas. Villages should not be considered large built up areas*”.

4.8 In the assessment criteria the NPPG notes that areas of land that make a “*weak or no contribution*” to Purpose (a) are likely to include those that: - are not adjacent to or near to a large built up area. The site falls clearly within this definition. Nutfield and South Nutfield are villages not large built up areas.

#### Purpose B – to prevent neighbouring towns merging into one another

4.9 The FPCR assessment concluded that the parcel of land includes Nutfield and borders South Nutfield. These settlements are separated by the change in levels and by areas of woodland and retain their separate identities. The undeveloped land between Nutfield and South Nutfield does play a role in maintaining the separate identities of these two settlements. Other towns are more remote from the parcel. Nutfield and South Nutfield are villages not towns.

4.10 For the evaluation of Green Belt, the NPPG clarifies that purpose B “*relates to the merging of towns, not villages.*”

4.11 The NPPG criteria sets a definition of “*Weak or None*” contribution and states

*“Assessment areas that contribute weakly are likely to include those that:*

- do not form part of a gap between towns, or
- form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation”

4.12 The application site falls within this description, the towns being remote from the site. The site would make a weak/no contribution to purpose b.

Purpose D – to preserve the setting and special character of historic towns

4.13 The FPCR assessment concluded that the parcel does not provide a setting, or any contribution to the special character of a historic town.

4.14 The NPPG states that in relation to Green Belt purpose D:

*“This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.”*

4.15 The site is not near any historic town and makes no contribution to this purpose.

4.16 In summary the conclusions on the contribution of the site to green belt purposes are set out below

Green Belt Purpose	Contribution to purpose
Purpose a) to check the unrestricted sprawl of large built-up areas	No contribution
Green Belt Purpose b) to prevent neighbouring towns merging into one another	Weak/ no contribution
Green Belt Purpose d) to preserve the setting and special character of historic towns	No contribution

Consideration of whether the site is Grey Belt

4.17 Consideration of the site's contribution to Green Belt Purposes (a), (b) and (d) is considered alongside the other relevant planning factors, to determine whether the site could be considered as “grey belt” within the Planning Statement Addendum prepared by HGH Consulting.

***Whether the development would “not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan” NPPF para 155***

4.18 Paragraph 155 of the NPPF December 2024 follows Paragraph 154 which sets out the range of exceptions to inappropriate development in the Green Belt. Paragraph 155 states:

*‘The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply (not all are repeated below):*

*a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan....'*

4.19 The paragraph goes on to identify other criteria to consider, and taken together a judgement is then reached on whether the development would not be inappropriate in the Green Belt. This is covered on the Planning Statement Addendum, produced by HGH Consulting.

4.20 The following section of this assessment looks at how the development would affect the purposes (taken together) of the remaining Green Belt across the area of the plan, to feed into this planning judgement. This judgment draws on the assessment of the contribution of the site to Green Belt purposes, but is a different exercise, assessing how the development (rather than the site) would affect purposes taken together. As such the terms used in the NPPG for the contribution of land (strong, moderate or weak contribution) are not the most appropriate ones for the assessment of effects. A narrative assessment is set out below

4.21 The analysis of the role of the site against Green Belt Purposes A, B and D earlier in this report shows that the site makes a weak or no contribution to these purposes. The development only takes up part of the site, and is largely contained by existing woodland, so the harms arising from the development are even more limited.

4.22 In terms of Green Belt purpose C, encroachment on the countryside, the site forms part of an area of disturbed but regenerating land. It is not open farmland / countryside. The earlier FPCR assessment submitted with the planning application (October 2023) concluded that the site provided a limited role in safeguarding the countryside from encroachment. The NPPG does not change this conclusion, and the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. Apart from the direct changes to the site itself, the changes would be barely perceptible across the wider Green Belt within the plan area.

## 5.0 SUMMARY AND CONCLUSIONS

5.1 In terms of Green Belt, the site does not strongly contribute to Green Belt Purposes a, b and d. The site has been assessed as making the following conclusion to Green Belt Purposes

Green Belt Purpose	Contribution to purpose
Purpose a) to check the unrestricted sprawl of large built-up areas	No contribution
Green Belt Purpose b) to prevent neighbouring towns merging into one another	Weak/ no contribution
Green Belt Purpose d) to preserve the setting and special character of historic towns	No contribution

5.2 The site does not strongly contribute to Green Belt Purposes a, b and d, and so passes the first part of the test to be “grey belt” land.

5.3 A further assessment of whether development of the site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area has shown that there would only be a limited effect on the overall Green Belt purposes.

5.4 The development therefore would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan. Apart from the direct changes to the site itself, the changes would be barely perceptible across the wider Green Belt within the plan area.

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