HEARING STATEMENT

Matter 4: Green Belt boundary alterations

MIQS questions addressed in this document;

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MIQS Question 4.1

Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?

Response to Question 4.1

4.1.0 The answer to matter 4; question 4.1 is ‘no’, for the following reasons;

4.1.1 We provided a significant level of detail on this process in our previous representation to the Regulation 19 consultation. This representation reviewed the lack of clear methodology. As per the instructions for this stage of the process, we will not duplicate this information here, but we would request that the information contained within this previous representation is considered in relation to this matter as it is directly applicable to the question at hand.

MIQS Question 4.2

In terms of paragraph 84 of the Framework, have the proposed alterations to the Green Belt boundaries taken account of the need to promote sustainable patterns of development and are they consistent with the Local Plan strategy?

Response to Question 4.2

4.2.0 The answer to matter 4; question 4.2 is ‘no’, for the following reasons;

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1 i.18.2264.ST001 – Soundness Test – Housing Allocations and Supporting Evidence page 4 and 9-16
There is no obvious correlation between the requirements of NPPF (2012) Paragraph 84 and the Green Belt Assessments. The approach taken to Green Belt boundary review is largely limited to an assessment of whether strategic areas meet the reasons defined in the NPPF for including land within the Green Belt. The ‘need to promote sustainable patterns of development’ would support the Spatial Strategy, but this is given no consideration.

The original consultation on the Spatial Strategy did consider the various scenarios for whether development should be channelled towards urban areas or inset towns and villages (the scenario concerning ‘beyond the Green Belt boundary’ is not applicable to Tandridge), resulting in the conclusion that development should be channelled towards existing urban areas rather than more rural locations.

However, this outcome is not given any consideration in the Green Belt Assessment. Green Belt on the urban fringe is considered in the same manner as more rural Green Belt with no specific weighting given to locations identified by the Spatial Strategy. This leads to a lack of commensurate assessment in line with the Spatial Strategy and the requirements of Paragraph 84.

Any correlation between the location of alterations to the Green Belt boundary and the requirements of paragraph 84 of the Framework are therefore coincidental rather than a deliberate attempt by the plan making process to promote a sustainable pattern of development.

**MIQS Question 4.3**

*Is the site selection methodology for sites to be released from the Green Belt robust and are the proposed alterations to the Green Belt boundaries justified?*

**Response to Question 4.3**

The answer to matter 4; question 4.3 is ‘no’ in relation to the site selection methodology, for the following reasons;

We provided a significant level of detail on the site selection process in our previous representation to the Regulation 19 consultation. As per the instructions for this stage of the process, we will not duplicate this information here, but we would request that the information contained within this previous representation is considered in relation to this matter as it is directly applicable to the question at hand.

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2 i.18.2264.ST001 – Soundness Test – Housing Allocations and Supporting Evidence
4.3.2 We also provided evidence relating to the way site-specific evidence was used by TDC\(^3\). Whilst we appreciate that omission sites are not to be discussed during this process, and we are therefore not asking the Examiner to review the objector’s omission site, the manner in which site-specific evidence was misused by TDC is an important consideration in assessing the adequacy of their site selection methodology. We would therefore ask that the information contained within this previous representation is taken into account in this context.

\(^3\) i.18.2264.ST002 – Soundness Test – Site CAT039 Evidence