

Matter 4 – 1/10/25 – Hearing Action

Green Belt Exceptional Circumstances Topic Paper (TP02)

- 1 The purpose of this Note is to set out the Council's proposal for further work in assessing the capacity of the Green Belt to accommodate additional growth.
- 2 The need for the Note arises in the light of evidence received during the afternoon session of day 3 of the examination on the potential to accommodate dwellings on land which is presently notated as Metropolitan Green Belt. In summary, the examination heard that in February 2017 Messrs Atkins were commissioned to carry out a Green Belt Study to assess the extent to which Epsom's Green Belt performs the Green Belt purposes. In January 2023, the Council produced the Epsom and Ewell Green Belt Technical Note (GB02) which included the Atkin's Study (2017). The subsequent work which followed the methodology set out in GB02 is reported in a Green Belt Study Update dated November 2024 (GB01). Separately the Council undertook an assessment of exceptional circumstances which is reported in TP02 dated December 2024. The express purpose of both the latter documents is to set out the evidence which informed the preparation of the Submission Draft (Regulation 19) Plan.
- 3 GB01 applies the 4-part methodology. TP02 then assesses each of the LAA Green Belt sites in terms of the nature and extent of the harm that would be caused by the release of land from the Green Belt and the extent to which such harm might be mitigated.
- 4 The examination of this evidence revealed the assessments in TP02 contain certain inconsistencies and inaccuracies. Consequently, it is possible that some sites that have been judged to serve a Green Belt purpose might objectively be suitable for release under the methodology contained in this document. If this is correct, the Council will not have done all it might have done to address the shortfall.
- 5 In the circumstances, a proportionate and fair method is required to check whether the Council could reasonably do more to meet the shortfall. To that end, the Council invites the Inspector to ask it to review the assessment of Green Belt LAA sites strictly in accordance with the methodology contained in TP02. This will enable it to determine whether there is the potential to identify additional land for housing in the Green Belt without harming Green Belt purposes.

What work is proposed

- 6 Revisit Section 4 of Green Belt Exceptional [Circumstances Topic Paper \(TP02\)](#), in relation to the appraisals relating to all the Green Belt LAA sites.

Scope of work

- 7 The appraisals for each of the sites identified above in Section 4 of the Topic Paper will be comprehensively reviewed to assess the two site-specific Calverton tests only, notably:

iv. the nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and,

v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.

- 8 They will be assessed using only the 3 purposes that stem from the 2017 Green Belt Study carried forward into GB01, namely assessing harm by considering the impact on the fundamental purposes of three of the five purposes defined in Para 143 of the NPPF December 2023:
 - a. Checking the urban sprawl of cities.
 - b. Preventing the merging of towns and cities.
 - c. Safeguarding the countryside from encroachment
- 9 This will include how the Plan has given first consideration to land which has been previously developed and / or is well served by public transport, in line with Para 147 of the NPPF December 2023.
- 10 In addition to the above, the proformas will be comprehensively reviewed to ensure:
 - Green Belt Review (2024) Stage 1 scores correctly apply to the site
 - The site description is accurate.
 - Information not relevant to the two site specific Calverton tests is not included in the appraisal
 - The concluding assessment clearly states the reasons why exceptional circumstances can (or cannot) be demonstrated for each site.