

Green Belt Boundary Changes at Morden

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1 Summary

This document details objections to the soundness of policy **V2** and policies map **SD49** in relation to the release of Green Belt land at Morden. To make the policy sound, the change to the Green Belt boundary at Morden should be removed from the policies map. This change would be consistent with policies map **SD01b** submitted by the council at the start of the examination.

2 The Green Belt boundary change at Morden

2.1 Background

2.1.0.1 During the Matter C (Green Belt) examination session, the council stated that policy map, **SD49**, should be examined instead of the modified map, **SD01b**. This re-introduced the removal of Green Belt (GB) land at Morden that was absent in **SD01b**. The council clearly believed that the Local Plan (LP) would be sound *without* the release of GB at Morden at the start of the examination.

2.1.0.2 The council stated the affected area of GB to be 76ha. That is over *five times* the total area of GB that would be released by the LP to meet identified housing needs. It is roughly the same area as “key service village”, Lytchett Matravers.

2.1.0.3 The removal of GB would be effected solely by policy **V2** and the policies map, **SD49**, on adoption of the LP. Importantly, this is *irrespective* of any application that may (or may not) come forward for a holiday park and SANG at Morden.

2.1.0.4 Paragraphs 133-142 of the NPPF relate to this GB boundary change. Paragraphs 143-147, relating to proposals affecting the GB, are not relevant because if any application for development at Morden were to come forward, GB status for the site would have already been removed. Policy **I5** is conditional and does not affect the boundary change.

2.1.0.5 The Morden GB boundary change was not identified as a corollary to the various options in the New Homes for Purbeck consultation. In the LP, the boundary change is not even mentioned in “The Green Belt” (paras. 45 - 48 and policy **V2**), appearing only on the policies map. There is no assessment of the loss of GB at Morden in the Sustainability Appraisal, **SD02**, in relation to policies **V2** or **I5**. Greater visibility of this loss of GB may have changed perceptions of the options for housing and generated alternatives from consultees.

2.1.0.6 Nothing would preclude an application for a holiday park and SANG at Morden without any changes to the GB boundary. In that case, the development would have to pass the “very special circumstances” tests for inappropriate development in the GB under NPPF paras. 143-147 but whatever the outcome, the GB would remain intact. This would be the case if **SD01b** and **MM18-20** were implemented as the council proposed.

2.2 Policy V2 and policies map SD49

2.2.0.1 This sub-section considers the release of land from GB at Morden in the context of NPPF paras. 133-142 where relevant to this case.

2.2.1 NPPF para. 133

“The Government attaches **great importance** to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land **permanently** open; the essential characteristics of Green Belts are their **openness** and their **permanence**.”

2.2.1.1 The changes at Morden would obviously deny the permanence of the current GB.

2.2.2 NPPF para. 134

“Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

2.2.2.1 The GB in north Purbeck is fulfilling all of these functions. The Green Belt Study, **SD56**, divides the GB into somewhat arbitrary chunks and argues that not every chunk is fulfilling every function. That may be true, but the function of the GB as a whole is of *great importance*. For example, in **SD56**, any part of the GB that does not directly border existing development would be assessed as not fulfilling a) or probably b), but this would be ignoring the need to maintain *large enough* open buffers between towns to which the whole GB may be contributing. In paras. 152 & 153 of **SD56**, the Morden site is attributed no purpose under a) and b) although it does contribute to these functions of the GB taken as a whole [as well as c) and e)].

2.2.3 NPPF para. 136

“Once established, Green Belt boundaries should only be altered where **exceptional circumstances** are **fully evidenced and justified**, through the preparation or updating of plans. Strategic policies should **establish the need** for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”

2.2.3.1 The *need* to remove the Morden site from the GB has not been fully evidenced or justified and the council's submission of the revised policies map **SD01b** demonstrates that it is not necessary. Policy **EE4** provides general support for tourism, but it does not establish a need for development at Morden and alternative tourism developments are clearly possible. There are no policies in the LP that require the Morden site to be removed from GB in order to deliver the plan's identified needs. The housing background paper, **SD19**, makes no mention of it. The brief assessment of paras. 150-157 of **SD56** does not amount to full evidence and justification of exceptional circumstances (see below).

2.2.4 NPPF para. 137

"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully **all other reasonable options** for meeting **its identified need for development**.

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and

c) has been informed by **discussions with neighbouring authorities** about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground."

2.2.4.1 There is no identified need for development at Morden, but even if there were, all other reasonable options have not been considered, and nor have neighbouring authorities been asked to accommodate it. The GB study, **SD56**, does not consider options at all. The review by the landowner of alternative sites on his own property, **SD83**, is clearly much more limited than the NPPF requires. The council established that its identified needs could be met without changing the GB boundary at Morden at the start of the examination by the policies map **SD01b**.

2.2.5 NPPF para. 138

"When drawing up or reviewing Green Belt boundaries, the need to promote **sustainable patterns** of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is **necessary** to release Green Belt land for development, plans should give first consideration to land which has been previously-developed

and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through **compensatory improvements** to the environmental quality and accessibility of remaining Green Belt land."

2.2.5.1 The removal of land from the GB at Morden would create an incongruous island in the GB that is not a sustainable pattern of development. The site does not channel development towards urban areas or towns and villages. The potential provision of a SANG may be held to be a compensatory improvement, but this is a consideration only if it is *necessary* to release the land in the first place. Furthermore, the LP policies *do not secure* any compensatory improvements on the release of the Morden site (which would occur automatically on adoption of the LP whether or not a SANG is ever created).

2.2.6 NPPF para. 139

"When defining Green Belt boundaries, plans should:

- a) ensure **consistency** with the development plan's strategy for meeting **identified requirements** for sustainable development;
- b) not include land which it is unnecessary to keep permanently open;
- c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
- e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
- f) define boundaries **clearly**, using physical features that are readily recognisable and likely to be **permanent**."

2.2.6.1 The site at Morden releases over five times as much land from GB as all the housing allocations (in GB) combined (76ha vs approximately 14.5ha) but without delivering any of the identified housing need. As such, the boundary change is inconsistent with the LP's strategy for sustainable development whilst preserving the openness and permanence of the GB.

2.2.6.2 The GB study, **SD56** para. 157, states that the proposed new boundaries to the GB at Morden would not all be clearly defined by permanent physical features.

2.2.7 NPPF para. 141

"Once Green Belts have been defined, local planning authorities should plan positively **to enhance their beneficial use**, such as looking

for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land."

2.2.7.1 Policy **V2** and the policies map, **SD49**, do not achieve any enhancements at Morden, only harm. If a SANG were to be created in the GB, it would only be an enhancement to a GB that has already been harmed.

2.3 Conclusions

2.3.0.1 As currently proposed, the LP would definitely remove a large area of GB at Morden on the grounds that it *may* facilitate creation of a SANG that *may* help to support an unknown number of housing developments in unknown locations arising under policy **H8**. The resulting GB would be fragmented and incoherent, which calls into question how permanent the change would prove to be.

2.3.0.2 There was inadequate exposure of the Morden GB boundary change during consultation.

2.3.0.3 The exceptional circumstances to support the change have not been adequately evidenced or justified and alternative strategies have not been considered (other than *not* changing the boundary at Morden, which the council proposed at the start of the examination).

2.3.0.4 Consequently, to make the GB policies sound, the policies map should be changed (again) to leave the Morden site in GB.