Spatial Planning Dissertation

by Emily Hall

UNIVERSITY COLLEGE LONDON FACULTY OF THE BUILT ENVIRONMENT

BARTLETT SCHOOL OF PLANNING

Nibbling at the Green Belt:

An Investigation into the Impacts of Small-Scale Residential Development

Emily Rose Hall

BA (Hons)

Being a dissertation submitted to the faculty of The Built Environment as part of the requirements for the award of the MSc Spatial Planning at University College London: I declare that this dissertation is entirely my own work and that ideas, data and images, as well as direct quotations, drawn from elsewhere are identified and referenced.

Signature:

Date:

2nd September 2019

Word Count (Main Body): 10,944

Word Count (Appendices): 4,991

ACKNOWLEDGEMENTS

CONTENTS

FIGURES

ABSTRACT

The realignment of the Green Belt is a heavily debated planning topic, creating conflicting public, political and academic opinions. The argument for the release of Green Belt land for housing is continually challenged by the need to conserve and protect England's natural landscapes. Hence, the primary purpose of this thesis is to investigate the controversy surrounding the Green Belt, reflecting on the relevant planning policies that define the use of land across England. Drawing on secondary data resources, primary research into planning decisions and semi-structured interviews with planning professionals, this project focuses specifically on the impact of small-scale, minor residential developments in eroding Green Belt boundaries and the subsequent alteration in the use of land throughout England. The south-east county of Surrey and the district of Tandridge are employed as unique case studies, in which the prevailing Green Belt trends and the predominant policy arguments employed in decision-making are examined. The data collected is reviewed in conjunction with relevant theoretical literature surrounding the controversial concept of Green Belt policy.

1 INTRODUCTION

1.1 The History of the Green Belt

The Green Belt is defined as "*a designated area of land surrounding a built-up area, into which urban expansion is strictly limited by planning policies*" (Gregory *et al.*, 2009, p.317). The concept of the Green Belt initially emerged during the reign of Queen Elizabeth I when a law was passed in 1592 prohibiting the erection of new buildings on undeveloped land within a ring of three miles around the London Wall (North Mymms District Green Belt Society, 2005). In the 1600s, the protection of land from development was re-introduced when Sir William Petty proposed a Green Belt two miles from the centre of London (Landscape Institute, 2018). The Green Belt also formed part of Ebenezer Howard's garden city movement in 1898
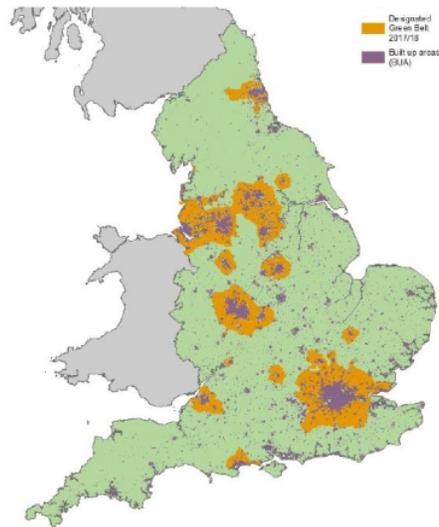
Figure 1: Extent of England's Green Belt as at 31st March 2018 (MHCLG, 2018b)

(Howard, 1902). The London Green Belt was first formally proposed by Patrick Abercrombie in the Greater London Plan in 1944 and was officially implemented under the UK's 1947 Town and Country Planning Act (RTPI, 2014). A total of 14 designated Green Belts now cover almost 13% of England, surrounding 38 major towns and cities (NE and CPRE, 2010). **Figure 1** illustrates the extent of England's Green Belts, as at 31st March 2018.

1.2 The Purpose of the Green Belt

The notion of a physical boundary between urban cities and their surrounding countryside has been fundamental to town and country planning since its origin (Elson, 1986). In accordance with both national and local planning policy, the Green Belt seeks to restrict the expansion of large built-up areas, aiming to prevent neighbouring towns from merging into one another (Barker, 2006). Amati (2016) articulates that the Green Belt has become the most famous

attempt to control urban sprawl throughout England where Green Belts have been a central part of national planning policy for over 50 years.

Central government Green Belt policy has remained largely unchanged since its initial implementation in the early 20th Century (Munton, 1983). Having become a permanent feature of the nation's planning system, Green Belt policy reform is heavily resisted and has become a highly contested planning matter (Mace, 2018). However, the inflexibility of Green Belt policy is increasingly criticised and is often blamed for the UK's housing crisis (Amati, 2016). According to Hall (1974), Green Belts are the most severe form of urban containment that has subsequently increased land and house prices across the country. More recently, Cheshire (2018) identifies the impact of the British planning system's restrictions on the supply of development in a time of increasing demand. The need to develop England's Green Belts sparks provocative opinions that continue to be debated throughout the worlds of politics and academia, influencing public opinion and creating a challenging task for planners and developers.

1.3   The Metropolitan Green Belt

The Metropolitan Green Belt was the first of the Green Belts to be established in the 1930s, seeking to control London's population growth pressures (Mace, 2018). Covering 516,000 hectares, the Metropolitan Green Belt accounts for 32% of the total area of England's Green Belt land (MHCLG, 2018b). The Metropolitan Green Belt has an area more than three times the size of Greater London that spreads across 68 different districts and boroughs (Mace, 2018). Hence, it has a longer history, greater size and more controversial development pressures than any of the other English Green Belts (Munton, 1983). Mace et al. (2016) demonstrates that the Metropolitan Green Belt is an "*effective but blunt policy instrument*" (p.9), generating polarised discussions in connection with housing supply and the degradation of the environment.

This thesis seeks to establish the extent to which development is encroaching onto Green Belt land, at a national, county and district level. The south-east county of Surrey is an important case study, where 24% (121,810 hectares) of the Metropolitan Green Belt exists within the Surrey border (Johnson, 2018). Situated in the east of Surrey and comprising 94% Metropolitan Green Belt (see **Figure 2**), the Tandridge district also represents a controversial case study for the assessment of Green Belt policy (Tandridge District Council, 2019). The Tandridge district has the second highest proportion of Green Belt in the country, as at 31st March 2018 (Grimwood and Barton, 2018).
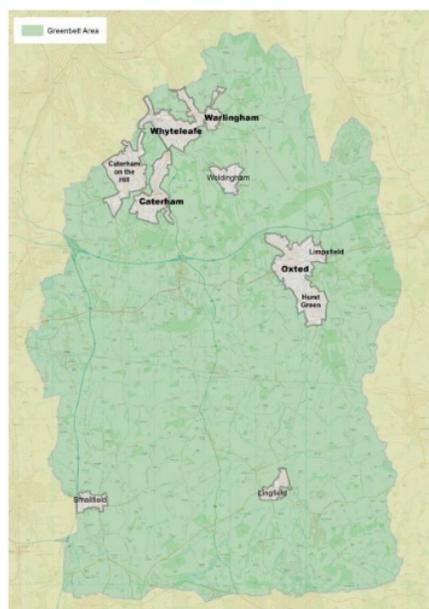
Figure 2: Extent of Metropolitan Green Belt in Tandridge District (Tandridge District Council, 2018)

1.4   Project Objectives

This thesis explores the ongoing controversy surrounding Green Belt policy, investigating the extent to which small-scale residential developments are gradually eroding Green Belt boundaries. For the purposes of this project, small-scale residential schemes are defined as those encompassing 'minor' developments of between 1-9 new dwellings. This research project will focus upon alterations to the Green Belt at a national scale, as well as the realignment of the Green Belt at the county and district level, uncovering the prevailing Green Belt policy arguments employed in decision-making. Interpretive policy analysis, secondary data analysis, primary research and interviews will be employed as the principal research methods throughout this project, seeking to address the following research questions:

1. At national, county and district level, to what extent are small-scale residential development projects eroding the Green Belt?
2. In determining minor residential developments in the Green Belt, what are the prevailing policy considerations utilised in practice?
3. What is the importance of small-scale realignment of the Green Belt and does this have a wider impact on its preservation?

2 PLANNING POLICY CONTEXT

The English planning system is a case-by-case system that relies on the controls attached to land and the weighting of material considerations to inform a decision (Mandelker, 1962). According to Elson (1986), "*Green Belts are the most long-standing policy instrument used by local authorities and central Government to shape patterns of urban development*" (p.xvii) in which the Green Belt has become a permanent feature of both national and local planning policy. This section sets out the relevant planning policy that will form the basis for this thesis.

2.1 National Planning Policy Framework (NPPF)

The most recent revision of the NPPF was published in February 2019 and sets out the Government's planning policies for England and how these should be applied. Chapter 13 of the NPPF is titled "Protecting Green Belt Land" in which Paragraph 133 confirms "*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*" (MHCLG, 2019b, p.40). Paragraph 143 illustrates that "*inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*" (MHCLG, 2019b, p.42). Whilst the construction of new buildings in the Green Belt is defined as 'inappropriate development', Paragraphs 145 and 146 of the NPPF list several exceptions to this.

2.2 Tandridge District Council Planning Policy

The Tandridge District Council Core Strategy was adopted in October 2008, setting out the key issues facing the district, including the retention of the Green Belt. The Green Belt is defined as a vitally important aspect in protecting the existing character of the district, seeking to control the outward spread of London and the merging of neighbouring communities (Tandridge District Council, 2008).

The Tandridge District Council Local Plan Part 2: Detailed Policies (2014-2019) was adopted in July 2014, containing a set of detailed planning policies to be applied locally. Policy DP10:

"Green Belt" states planning permission for any inappropriate development which is, by definition, harmful to the Green Belt, will normally be refused. Policy DP12: "Development in the Defined Villages in the Green Belt" identifies several Green Belt settlements within which infilling and small-scale residential development is appropriate. In line with the NPPF, Policy DP13: "Buildings in the Green Belt" reiterates the exceptions to inappropriate development in the Green Belt (Tandridge District Council, 2014).

3 LITERATURE REVIEW

A considerable amount of literature has been written about England's Green Belt dating back to the initiation of the policy in the 16th Century and its implementation in the 20th Century. A wide range of academic articles and practice-based reports have ultimately informed a key understanding of the background to Green Belt policy. Snowball referencing has been employed to enhance the range and quality of the literature analysed. Various media articles that present Green Belt policy controversy in the modern day have been evaluated, highlighting the ongoing complexities of Green Belt discussions. Several government reports containing key statistics have formulated a clear and objective understanding of England's current Green Belt policy. In addition, membership of the 'Planning Resource' has allowed unlimited access to important updates on Green Belt policy, case law and general planning trends. This literature review seeks to expand upon the basic understandings of Green Belt policy, highlighting the growing controversy and identifying the process of small-scale erosion of the Green Belt at the national, county and district level.

3.1 The Aims of Green Belt Policy

England's Green Belts are a long-standing top-down policy intervention, in which their aims and characteristics are set out within national planning policy. In line with the fundamental aim of preventing urban sprawl on a national scale, local authorities also have a responsibility in defining and protecting the Green Belt at a local level, through the implementation of local planning policies (CPRE, 2014). Seeking to control unwanted development and protect local amenities, local authorities are responsible for reviewing their Green Belt boundaries within their Local Plans, defining and controlling what constitutes 'inappropriate development' in the Green Belt (Munton, 1983).

Despite the publication of both national and local policy, few members of the public fully understand the main purpose of the Green Belt in which its aims to safeguard the countryside from encroachment are often greatly misunderstood. Drawing upon the representations made within politics and the media, public perceptions usually revolve around the Green Belt being a place of natural beauty where the environment is protected to the highest standard. In reality, Green Belts are vastly dynamic in their landscape characteristics where only 9% of England's Green Belts are designated National Parks or Areas of Outstanding Natural Beauty (AONB)

(Sturzaker and Mell, 2017). In this sense, academics such as Amati (2016) and Mace (2018) present a more objective understanding of Green Belt policy, assessing the role of politics and the media in influencing public opinion. Providing factual and statistical data, local authorities have also begun to re-inform the public that the Green Belt is a planning designation, as opposed to a description of the land where the Green Belt varies significantly in landscape quality (Tandridge District Council, 2014).

3.2   Green Belt Policy: A Success

Restricting urban growth and protecting open space since its initial implementation, the Green Belt has been undeniably successful in achieving its original objectives (NE and CPRE, 2010). Academics such as Barker (2006; 2014) agree that Green Belt policy has generated substantial social and environmental benefits, enhancing quality of life and preserving publicly accessible open spaces of high amenity value (London First, 2015). Taking on a more realistic approach, Sturzaker and Mell (2017) articulate that without the Green Belt, there would be uncontrollable social, economic and environmental decline with increased traffic, congestion, pollution and noise resulting from the fragmentation of neighbourhoods across the British countryside. Having understood the fundamental aims of the Green Belt, Munton (1983) demonstrates that Green Belt policy is one of the most widely supported and long-lasting planning policies.

3.3   Debate & Controversy

Scholarly literature written by planners, politicians, geographers and urbanists is traditionally positive, with little insight into what the future holds for Green Belt policy. However, in recent years, an increasing number of academic studies, media articles, pressure group reports and government statements have heavily criticised England's Green Belts, defining the policy as inflexible and outdated (Mace *et al.*, 2016; Moore, 2014). Moreover, a predominant concern relating to the continued implementation of Green Belt policy is the shortage of land available for housing development.

Gallent and Tewdwr-Jones (2007) raise concerns regarding the limited supply of land available to meet increasing housing demands. Land availability is evidently one of the key processes

underpinning housing delivery where permanent land designations, such as the Green Belt, are heavily critiqued for their role in restricting housing supply and increasing property prices (Carmona *et al.*, 2003; Gallent *et al.*, 2019; Satsangi *et al.*, 2010). According to the landmark report prepared by NE and CPRE (2010), property prices are, on average, 20% higher in the Green Belt compared to non-Green Belt areas. Thus, the continued implementation of London's Green Belt is ultimately linked with the chronic shortage of affordable housing across England, and particularly in the South East (Amati and Yokohari, 2006). Shucksmith (1990) identifies the need to strike a balance between preserving the English countryside and meeting the need for housing across the country.

Today, Green Belt policy is under political attack for being outdated and no longer fit for purpose, where there is considerable tension between the continued protection of England's Green Belts and the requirement to meet housing needs across the country (Scott *et al.*, 2019). With limited land mass and one of the highest population densities in Europe, Amati (2016) explores the extent to which England's Green Belt remains a useful or relevant concept for the 21st Century. Gallent *et al.* (2006) acknowledge the wide variety of criticisms towards Green Belt policy in which the longstanding land designation was never intended to be so permanent and rigid. Thus, an increasing number of academics are beginning to examine the future role of Green Belt policy. The media have also become heavily critical of the Green Belt's aims and its restrictions in city expansion (Moore, 2014).

3.4   Reduction & Reform

England's Green Belt policy evidently has a long history of being successful. However, as identified above, recently published academic literature has begun to contest the restrictive nature of Green Belt policy, arguing the extent to which Green Belt boundaries should be reformed (Amati and Yokohari, 2006). On a national scale, Mace (2018) identifies current debates that predominantly fixate on the political resistance to large-scale Green Belt policy reform. In addition, Carmona *et al.* (2013) pinpoints prevailing concerns at a local level in connection with the release of Green Belt land for development by local authorities. The contested nature of Green Belt policy reform has been recognised by the national government, whereby Grimwood and Barton (2019) have collated a factual briefing paper containing an informed discussion of the future of Green Belt policy and the potential for Green Belt boundary review. In response, pressure groups, such as the Campaign to Protect Rural England and the London Green Belt Council, have published several Green Belt studies, a

collection of which have been submitted to national government and most recently for the Draft New London Plan Examination In Public, expressing their concerns over the development threats to England's Green Belt (London Green Belt Council, 2017; 2019a; 2019b). The review of Green Belt policy is evidently a highly contested planning matter in the present day.

3.5   Reflection on the Literature

The relevant academic literature, government reports, political debates and public protests have revealed an array of contrasting opinions relating to the Green Belt, many of which relate to the implications of large-scale realignment of the Green Belt boundaries and the extent to which major planning proposals would alter the coverage of the designated land on a national scale. However, published literature demonstrates a sufficient lack of insight into the ways in which small-scale residential developments are eroding England's Green Belt, where such discussions are not a central focus in politics or academia. According to Glenigan (2018), residential planning applications and approvals on the Green Belt have grown progressively and there is general consensus that more is being built on England's Green Belts. Yet, national statistics refer primarily to the approval of major housing schemes, whereby small-scale developments are generally overlooked. This thesis therefore considers the ways in which the approval of minor residential developments is gradually altering the Green Belt boundaries in England, Surrey and Tandridge.

In addition, published academic literature fails to determine the prevailing Green Belt policy considerations employed in decision-making as individual case studies are often disregarded. Hence, this research project aims to undertake a unique study that examines the specific terminology incorporated in decisions for approving and refusing proposals for minor residential developments within the Green Belt.

4 ANALYTICAL FRAMEWORK & METHODOLOGY

This section identifies and examines the methods employed throughout this research project, relating to the analytical framework, the data collection, the use of secondary data analysis, the organisation of semi-structured interviews and the data analysis process.

4.1 Analytical Framework; Interpretive Policy Analysis

When determining planning proposals, Planning Officers and Inspectors must consider the notion of 'inappropriate development' in the Green Belt, in accordance with the definitions set out within national and local planning policy. Yet, policy making has an undeniable political backdrop where shifts in Green Belt policy discussions are often influenced by shifts in government (Hajer and Wagenaar, 2003). Hence, Green Belt policy is a complex and controversial topic, with ongoing debates taking place throughout the worlds of politics, academia and the media. It is important to establish the conflicting interpretations of Green Belt policy, given the contrasting public perceptions. This thesis therefore seeks to engage in interpretative policy analysis, taking into account the work of Frank Fischer, Dvora Yanow, Maarten Hajer and Hendrick Wagenaar.

Interpretive policy analysis is the presumption that societal issues addressed in policymaking have different meanings to different groups of people, often contrasting with the original meaning intended by the policy makers. Interpretive policy analysis seeks to determine the different perspectives that people have on an issue, how this impacts what they see, how they see it and how they react (Hult and Johnson, 2015). Fischer and Forester (1993) identify an 'argumentative turn' in policy analysis in which there is an increasing focus on the role of argumentation in policy communication and evaluation, creating additional controversy in the modern day. Policy analysis can extend from evaluating policies before they have been adopted, to evaluating policies after their implementation, the latter of which is the case in this project. Interpretative policy analysis will be used within this thesis to determine the prevailing policy considerations employed in decision-making, establishing the reasons for approving and refusing minor residential developments in the Green Belt and the ways in which such schemes contribute to the erosion of the Green Belt. The written language of Green Belt policy

itself will be considered as well as the language used by the decision-maker in planning records (Yanow, 2000).

4.2   Secondary Data Analysis

Secondary data is characterised as information that has already been collected by another party which is readily available to use (Clark, 2005). According to Trzesniewski *et al*. (2011), secondary data has traditionally comprised quantitative and statistical data, yet qualitative data has been increasingly archived for secondary data analysis in recent times. It is acknowledged that existing data is not always able to address particular research questions where secondary data often includes a limited number of surveys or measurements. Furthermore, it is difficult to determine whether the primary researcher had access to all available information in which the constraints of the study are not usually disclosed. Nonetheless, there are undeniable benefits to having an easily accessible, extensive range of reliable resources comprising both quantitative and qualitative data. Given the data has already been collected and is readily available to analyse, secondary data analysis is efficient in conserving costs, time and resources. Secondary data sources are often much denser and of much higher quality than individual investigations, additionally ensuring the current researcher adopts an objective and open approach (Little, 2013).

Quantitative secondary data has been collected from a variety of national, county and district level articles and reports. The Ministry of Housing, Communities and Local Government together with the Office for National Statistics have published several statistical reports between 2011 and 2019. With estimates collected annually as at 31 March, these publications provide detailed information on national land use change and local planning authority Green Belt releases in England. It is noted that these findings have been reiterated by several reports published by Natural England, the Campaign for the Protection of Rural England and the London Green Belt Council. Such reports also encompass statistics relating to the extent of Green Belt land in Surrey. Having assessed the time available and the scope of work undertaken, the use of secondary data analysis represents an appropriate research method, enhancing an understanding into the reality of Green Belt policy in practice.

4.3   Primary Research

Primary research is research that is collected first-hand, including observations, investigations and surveys. Primary research methods are often used for solving problems that do not have a significant range of published information and for establishing how a larger problem plays out at the local level (Lowe and Zemliansky, 2011). Whilst being potentially time consuming, primary research seeks to eliminate bias through the collection of factual information. For the purposes of this thesis, extensive primary research has been undertaken through the analysis of a range of planning records relating to minor residential developments proposed on the Green Belt throughout Tandridge over a five-year period (31 July 2014 – 31 July 2019). This includes Decision Notices, Officer Reports and Appeal Decisions which are publicly accessible, and which are useful tools in highlighting the prevailing Green Belt policy considerations. Using Tandridge District Council's online planning applications search engine, a total of 222 planning decisions in Tandridge were successfully collated.

4.4   Data Analysis

Following the collection of primary data, thematic analysis was undertaken using NVivo, a qualitative data analysis software (QSR International, 2019). The analysis sought to classify the predominant Green Belt policy arguments for approving and refusing small-scale residential developments within Tandridge, set out within the Officer Reports and Appeal Decisions. Following the storage, organisation and categorisation of the relevant planning records, NVivo facilitated thematic coding to be undertaken, thus helping to identify common themes (Edhlund and McDougall, 2012). Whilst Bryman and Burgess (1994) raise concerns about the unstructured and disorganised nature of qualitative data, Crang (2005) identifies a range of advantages to coding data into specific classifications, making the data analysis simpler and more efficient.

The findings derived from the national and county statistical reports, and the data analysed from the planning records using NVivo, has been visually presented in order to enhance understanding. Multiple themes, correlations and trends have been uncovered and analysed, as illustrated throughout this project. It should be noted that given the focus on Surrey and Tandridge, the results established are not fully representative of development trends across the entirety of the UK. Nevertheless, the use of primary research has provided unique data that directly relates to the study questions set out in this thesis.

4.5 Interviews

In addition to the secondary data analysis and following the presentation of the primary research results, semi-structured interviews were employed in order to validate and challenge the findings. According to Valentine (2005), interviewing is a key qualitative method in which social encounters take on a conversational style, allowing the researcher to gather unique data. When interviewing, it is important to understand that multiple perceptions of the same concept exist, where there are a variety of 'realities' as opposed to one singular 'truth' (Schwartz-Shea and Yanow, 2012). It is acknowledged that interviews are often difficult to quantify and measure, whereby each participant will provide a unique response (Trochim *et al.*, 2015). Moreover, the recruitment of participants can be challenging, especially when attempting to interview members of public bodies. Nevertheless, interviewing is a constructive research method, providing a rich source of in-depth data.

Semi-structured interviews are a form of guided conversation, offering an opportunity to receive specialist perspectives that are not generally pre-categorised and are not usually available in the public domain (Alshenqeeti, 2014; Gubrium and Holstein, 2001). For the purposes of this project, a semi-structured schedule of interview questions was prepared in advance, comprising open ended questions that had been derived from national and local planning policy and the conceptual framework of this thesis (see **Appendix 1**). Two interviews took place with selectively sampled Planning Consultants, each holding relevant experience and expertise in practicing Green Belt policy within the public and private sector. Tandridge District Council's planning department were also approached, however only automatic responses were received via email whereby Tandridge District Council is currently undergoing a mass restructuring, hence why members of the Planning Department were so difficult to recruit (Curley, 2019). Nonetheless, for the purposes of validating the research gathered and gaining expert opinions in the small-scale re-alignment of the Green Belt, semi-structured interviews have proved to be an effective form of primary data collection.

4.6 Ethical Considerations

Ethical issues were not anticipated to arise from the interpretive policy analysis, secondary data analysis or primary research undertaken for the purposes of this thesis, given that the material comprises publicly accessible data. In addition, there were no ethical concerns relating to the two interviews that took place with the Planning Consultants, provided the

interview content did not contain personal data. In compliance with the appropriate ethical and moral review addressed by Gregory (2003), each respondent was issued an information sheet and had the opportunity to ask any questions before entering the interview process (see **Appendix 2**). Each respondent had agreed to participate by signing an individual consent form (see **Appendix 3**). Participants were able to leave the interview process at any time and could request the destruction of all information gathered. The anonymity of the respondents has been maintained, in which only brief descriptions of their professional experiences are disclosed. A full Risk Assessment Form is attached at **Appendix 4**.

4.7   Summary

The methods employed for the purposes of this research project have successfully facilitated the collection and analysis of an extensive range of data. The results found have ultimately contributed to the investigation into small-scale residential developments and the realignment of the Green Belt on a national, county and district level. Furthermore, this methodological approach has assisted in identifying the frequent policy phrases used when determining proposals in the Green Belt, contributing to effective interpretive policy analysis. In addition, the results of the secondary data analysis and primary research have been validated and challenged by two specialists working with the planning and development sector. The methodological approaches utilised within this project have helped to assess the reality of Green Belt policy in practice.

5 FINDINGS

Having undertaken secondary data analysis, primary research and two interviews with Planning Consultants, this section conveys the key findings and patterns that have emerged. An array of national, county and district statistics are presented and are subsequently analysed in **Section 6**.

5.1 National Statistics: England

According to MHCLG (2019a), England has a land area of just over 13 million hectares in which more than one third of England's land is protected against development by one or more environmentally protected designations. In order to obtain a general understanding of the extent of development throughout England, it was at first important to review how much of England's land area is developed and how this has changed over time. **Figure 3** combines the data from the MHCLG Green Belt statistical reports dated 2011-12 to 2017-18 and confirms that the developed land area of England has increased from 9% as at 31 March 2012 to 11% as at 31 March 2018. This is a total increase of 2% over a 6-year period.

Land Area of England Developed								
Year	2011 - 2012	2012 - 2013	2013 - 2014	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	Change 2010 - 2011 to 2017 - 2018
Land area of England developed (%)	9	9	9	11	11	11	11	+2

Figure 3: Land Area of England Developed (CLG, 2011; DCLG, 2012; 2014a; 2014b; 2015b; 2016b; 2017b; MHCLG, 2018b)

In comparison to the land area of England that is developed, the national statistics also clarify the change in the area of Green Belt land in England (see **Figure 4**). At 31 March 2011, the Green Belt in England was estimated at 1,639,530 hectares, equivalent to 12.57% of the total land area. However, the most recent figures illustrate that England's Green Belt is now estimated at 1,629,510 hectares, equivalent to 12.49% of the total land area. Hence, the findings demonstrate a steady reduction in the area of Green Belt land in England following a decrease of 10,020 hectares (0.61%) from 31 March 2011 to 31 March 2018.

Area of Green Belt Land in England									
Year	2010 - 2011	2011 - 2012	2012 - 2013	2013 - 2014	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	Change 2010 - 2011 to 2017 - 2018
Area of Green Belt land in England (ha)	1,639, 530	1,639, 480	1,639, 160	1,638, 630	1,636, 500	1,635, 490	1,634, 580	1,629, 510	-10,020
Area of Green Belt land in England (%)	12.57	12.57	12.56	12.56	12.54	12.54	12.53	12.49	-0.61

Figure 4: Area of Green Belt Land in England (CLG, 2011; DCLG, 2012; 2014a; 2014b; 2015b; 2016b; 2017b; MHCLG, 2018b)

In accordance with the reduction of England's Green Belt, it has been implied that such large-scale realignments are primarily due to the release of Green Belt land following the adoption of new Local Plans by individual local authorities (MHCLG, 2018b). A total of 186 local authorities have designated Green Belt within their boundaries (CLG, 2011). **Figure 5** confirms that 50 of these local authorities have reviewed their Green Belt boundaries from 2010-11 to 2017-18, contributing to the erosion of England's Green Belt land.

Number of Authorities Making Changes to Green Belt Boundaries in England									
Year	2010 - 2011	2011 - 2012	2012 - 2013	2013 - 2014	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	Total number of authorities
Number of authorities making changes to Green Belt boundaries	3	3	4	3	11	8	8	10	50

Figure 5: Number of Authorities Making Changes to Green Belt Boundaries in England (CLG, 2011; DCLG, 2012; 2014a; 2014b; 2015b; 2016b; 2017b; MHCLG, 2018b)

Drawing upon the national land use statistics published by the MHCLG, the percentage of new residential dwellings created within the Green Belt was assessed from 2013-14 to 2017-18. **Figure 6** demonstrates that in 2017-2018, 2% of the total residential dwellings created in England were located within the Green Belt. Furthermore, over half of the new residential dwellings created within the Green Belt have consistently been built on previously developed land since 2013-14.

Residential Dwellings Created in the Green Belt in England						
Year	2013 - 2014	2014 - 2015	2015 - 2016	2016 - 2017	2017 - 2018	Change 2013 – 2014 to 2017 - 2018
Residential dwellings created in the Green Belt (%)	3	3	2	4	2	-1
Residential dwellings created in the Green Belt on previously developed land (%)	62	56	57	51	53	-9

Figure 6: Residential Dwellings Created in the Green Belt in England (DCLG, 2015a; 2016a; 2017a; MHCLG, 2018a; 2019a)

5.2 County Statistics: Surrey

The south-east county of Surrey is divided into 11 individual boroughs and districts, each containing a portion of the Metropolitan Green Belt. The London Green Belt Council have published a total of three reports in connection with the predicted loss of the Metropolitan Green Belt from July 2016 to July 2018. As at July 2016, a total of 24,185 dwellings were proposed to be built on the Metropolitan Green Belt in Surrey, compared to 37,590 as at July 2017 and 29,381 as at July 2018. **Figure 7** demonstrates that Surrey is currently considered to be the county with the third greatest number of threats from development proposed on the Metropolitan Green Belt (London Green Belt Council, 2016; 2017; 2019a). A breakdown of the proposed dwellings on the Metropolitan Green in each borough and district in Surrey, as at July 2018, is presented at **Figure 8**.
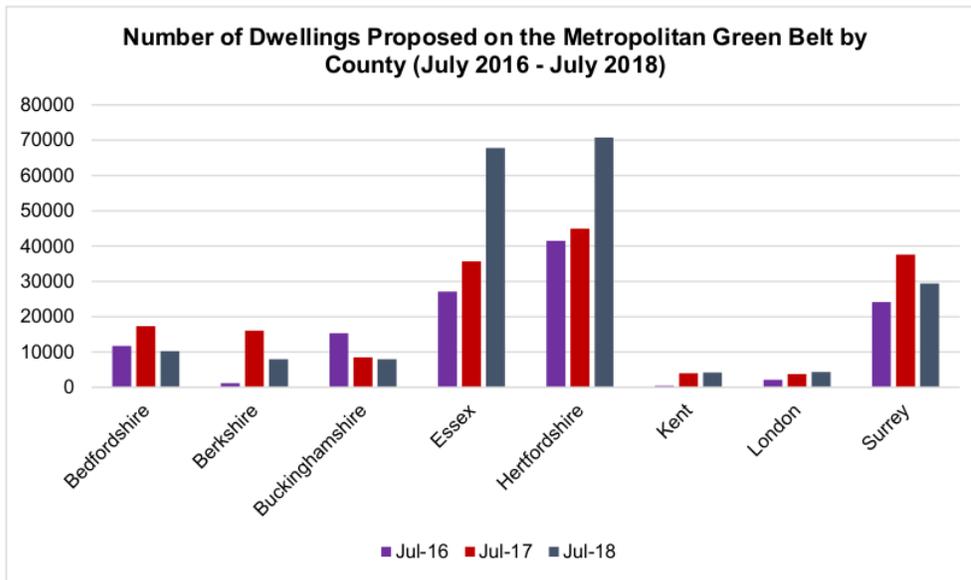
Figure 8: Number of Dwellings Proposed on the Metropolitan Green Belt by County (July 2016 – July 2018) (London Green Belt Council, 2016; 2017; 2019a)
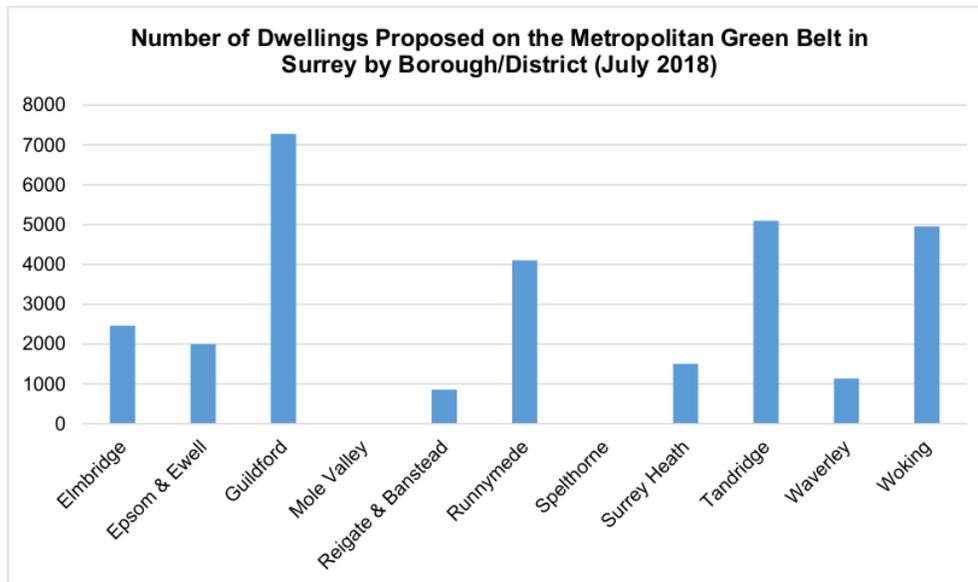
Figure 7: Number of Dwellings Proposed on the Metropolitan Green Belt in Surrey by borough and district (July 2018) (London Green Belt Council, 2019a)

5.3   District Statistics: Tandridge

Figure 8 demonstrates that, as at July 2018, the district with the second highest number of dwellings proposed on the Metropolitan Green Belt in Surrey was Tandridge, totalling 5,093 new dwellings. In order to establish the number of minor residential developments that have contributed to this trend, primary research has been undertaken. Using Tandridge's online planning application search engine, applications and appeals for minor residential developments that were decided between 31 July 2014 and 31 July 2019 have been collected and the results are presented below. Applications for permitted development, prior approvals, single replacement dwellings and agricultural workers' dwellings were not assessed because they would not result in a net increase in residential dwellings in the Green Belt, nor an extension of the existing built form.

A total of 222 applications for minor residential developments in the Green Belt were decided over the five-year period and were subsequently analysed (see **Appendix 5**). A total of 105 applications were granted (47%), 115 applications were refused (52%) and 2 applications were not determined (1%). See **Figure 9**. Of the 115 applications refused, a total of 46 appeals were lodged (40%). A total of 2 appeals were allowed (4%) and 44 appeals were dismissed (96%). **See Figure 10**. The results demonstrate that from 2014 to 2019, the number of applications submitted, and the number of appeals lodged for minor residential development in Tandridge's Green Belt has generally increased. Accordingly, the number of proposals granted planning permission in Tandridge has increased from a total of 16 applications granted in 2014-15, to a total of 28 applications granted in 2018-19. However, the proportion of applications refused at the local level has increased over the five-year period from 47% of applications refused in 2014-15 to 60% of applications refused in 2018-19. Hence, whilst there is an increasing number of proposals being submitted and approved, there is an increasing percentage of applications being refused at the local level. This is reflected within the appeal process as only 2 appeals for minor residential developments in the Green Belt have been allowed in Tandridge over the last five years.
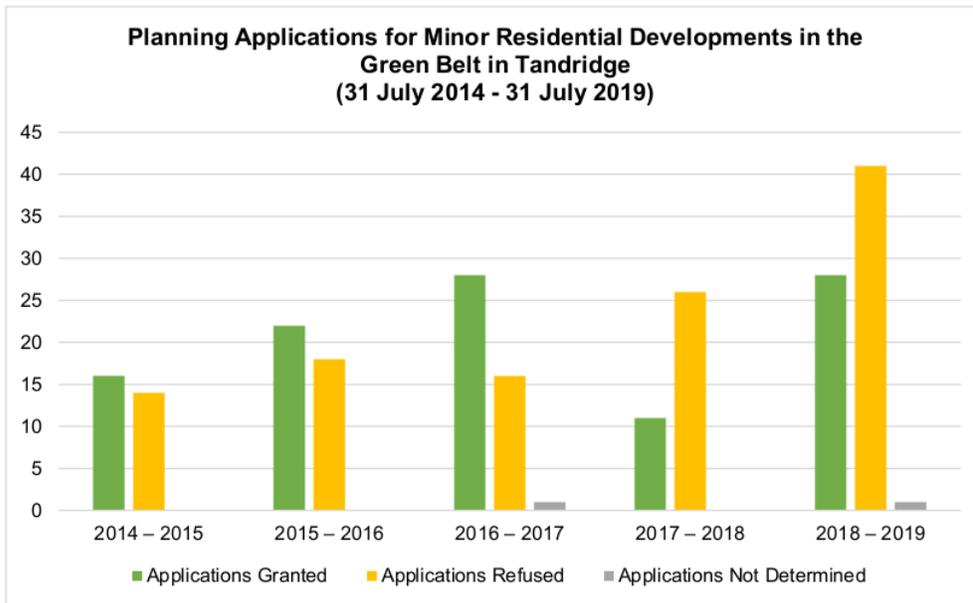
Figure 10: Planning Applications for Minor Residential Developments in the Green Belt in Tandridge (31 July 2014 – 31 July 2019)
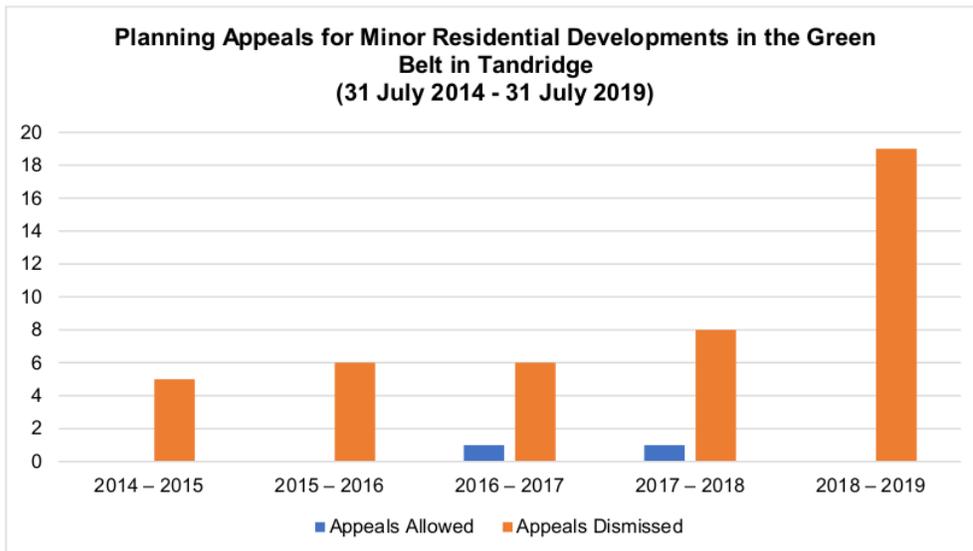
Figure 9: Planning Appeals for Minor Residential Developments in the Green Belt in Tandridge (31 July 2014 – 31 July 2019)

Alongside the quantitative data collected, qualitative data was also gathered through the detailed analysis of the relevant planning records. The Officer Reports and the Appeal Decisions relating to the 222 applications and appeals were imported into NVivo and were classified thematically. Based on the terminology set out within national and local planning guidance, a total of 10 categories were created and used to assess the planning records. See **Figure 11**.

Name	Files	References
01 Appropriate Development	123	124
02 Inappropriate Development	99	100
03 Harm to Openness	59	63
04 Impact on Character and Appearance	50	50
05 Unsustainable Location	38	38
06 Poor Design	19	19
07 Previously Developed Land	65	65
08 Defined Village	46	46
09 Limited Infilling	11	11
10 Very Special Circumstances	9	9

Figure 11: List of Nodes Created in NVivo

The relevant applications and appeals were first categorised into those comprising 'appropriate' development and 'inappropriate' development in the Green Belt. Of the 222 decisions made, 55% of the proposals were assessed as 'appropriate' development in the Green Belt in which "*the impact upon the openness of the Green Belt and the purpose of including land in it are such that the proposal would have no greater impact than at present and as such constitutes an appropriate form of development.*" (Application Number: 2014/290). In comparison, 45% of the proposals were defined as 'inappropriate' development in the Green Belt whereby "*the proposals would constitute inappropriate development which, by definition, is harmful to the Green Belt*". (Application Number: 2018/1910).

Considering that 48% of proposals were granted planning permission and 52% of proposals were refused planning permission, there are evidently several factors underlying the definitions 'appropriate' or 'inappropriate' development in the Green Belt. Hence, several specific reasons for granting and refusing permission were identified, in which each

proposal was assessed on its own merits. The redevelopment of previously developed land, 'limited infilling' in villages and the demonstration of 'very special circumstances' were identified as predominant reasons for approval. Contrastingly, the impact on the openness of the Green Belt, the impact on local character and appearance, poor design and proposals considered to be sited within unsustainable locations formed frequent reasons for refusal.

5.4   Interviews

Following the secondary data analysis and the primary research, two Planning Consultants were interviewed in order to discuss the results found. The participants demonstrated detailed knowledge and experience in dealing with Green Belt policy, particularly within Surrey and Tandridge.

Several discussions surrounding the purpose of the Green Belt took place, where Planning Consultant B identified that the Green Belt "*is too little understood by people in what it actually is and the purpose of it and how much land it covers*". Planning Consultant A reinforced that "*Green Belt is a policy designation; it is not a landscape designation*". Planning Consultant A acknowledged that the most substantial re-alignment of England's Green Belt results from Local Plan reviews in which it was advised "*if you want to obtain planning permission in the Green Belt, you need to do it through the promotion of a site in the Local Plan or a Neighbourhood Plan*". In comparing the number of proposals for minor residential developments in the Green Belt that are approved and refused, Planning Consultant A presumed "*the majority would be refused or dismissed on appeal because they are in the Green Belt*", in line with the primary research results.

Both Planning Consultants identified various reasons for refusing minor residential development schemes in the Green Belt, throughout England, Surrey and Tandridge. In accordance with national and local planning policy, Planning Consultant A confirmed that new development will always have an impact on the openness of the Green Belt to an extent as "*new dwellings in the Green Belt are the definition of harm, and so it is a matter of fact. Even if you can't see it, it would conflict with Green Belt policy in terms of openness*". Planning Consultant A also detailed the controversial assessment of a site being located within an 'unsustainable location' in which it would be unsuitable for development: "*in terms of sustainability, that's a tricky one because a lot of sites in the Green Belt, apart from the ones*

right next to the settlements, are going to have a sustainability issue". Planning Consultant B asserted that refusing applications and appeals on the grounds of unsustainability "*is complete nonsense*".

On the contrary, in determining applications and appeals, Planning Consultant B identified that there is "*more policy support including previously developed land and limited infilling*" that support proposals for minor residential developments in the Green Belt. In particular, Planning Consultant A reflected upon the "*policy in the Framework that refers to limited infilling in villages*" whereby certain forms of development are permitted within defined villages and settlements in the Green Belt. In general, Planning Consultant A stressed the importance of demonstrating 'very special circumstances' for which development should be allowed in the Green Belt. Although, Planning Consultant B noted that the successful formulation of 'very special circumstances' is rare and "*often quite difficult*".

Looking forward, when asked if the Green Belt is likely to remain a permanent feature of England's planning policy guidance, Planning Consultant A explained "*it needs to be reviewed. Do I think it is going to happen? I doubt it. It's too big of a hot potato. Politically it is not going to work*". In addition, Planning Consultant B asserted "*there is too much politics involved in Green Belt, it is too much of a political hot potato*", thus demonstrating the complexity of Green Belt policy in practice.

6 ANALYSIS & DISCUSSION

Amalgamating the results set out in **Section 5**, this section investigates the extent to which small-scale residential developments are eroding England's Green Belt boundaries and the justifications for granting and refusing such planning proposals. The future of Green Belt policy is subsequently scrutinised, drawing upon the theoretical framework outlined within this research project.

6.1 Green Belt Trends Over Time

Barker (2006) identifies a strong public belief that the majority of England's land area is developed. However, in accordance with the national statistics presented in **Figure 3**, only 11% of the land area of England was developed as at 31 March 2018. Comparatively, 12.49% of England's land area was Green Belt as at 31 March 2018, as shown in **Figure 4.** Hence, the area of Green Belt land in England surprisingly exceeds the area of developed land. Nevertheless, the national statistics indicate a steady reduction of 10,020 hectares (0.61%) in the extent of England's Green Belt from 31 March 2011 to 31 March 2018. Carmona *et al.* (2003) identify the primary reason for this is the release of Green Belt land for site allocations within Local Plans. The in-depth discussions with Planning Consultant A also confirmed that the most effective way of overcoming the restrictions of Green Belt policy "*is to have land allocated through Local Plans*", conforming with the results set out in **Figure 5**. From 2010-11 to 2017-18, a total of 50 local authorities in England made changes to their local Green Belt boundaries, allocating land for employment, retail and residential purposes. It should be noted that the allocation of Green Belt land for residential development within the identified boroughs and districts comprised major planning proposals only, resulting in the net reduction of the Green Belt. Thus, minor residential developments are rarely considered within Local Plan reviews and hence it is important to assess the specific number of minor developments proposed in the Green Belt.

The English government has recently brought forward policies and programmes that acknowledge the greater viability and achievability of rural sites (Satsangi *et al.*, 2010). In the same manner, Planning Consultant B identified the increasing pressure for residential development to meet local and national housing needs, in which it is presumed that more development is subsequently being proposed on the Green Belt. From April 2009 to March

26

2018, Glenigan (2018) identified a progressive increase in the number of residential planning applications both submitted and approved in the Green Belt, with a significant increase from 2012 onwards following the publication of the NPPF. At the county level, the number of dwellings proposed on the Metropolitan Green Belt in Surrey increased from 24,185 in July 2016 to 29,381 in July 2018 (London Green Belt Council, 2016; 2017; 2019a). In Tandridge, the number of applications submitted for small-scale residential developments gradually increased from 30 applications in 2014-15 to 70 applications in 2018-19. Corresponding with nation-wide pressures for development, the number of proposals on the Green Belt is therefore increasing on a national, county and district scale.

6.2   Reasons for Approval

In line with the growing number of applications submitted for residential development in the Green Belt, the number of proposals granted planning permission has subsequently increased, thus illustrating an intensification of residential development. It is therefore essential to understand the primary reasons for approving such proposals within the Green Belt, corresponding with the exceptions to 'inappropriate' development set out within national and local planning policy. Incorporating the specific terminology employed in decision-making, the following sections combine the common reasons for granting planning permission identified in NVivo, the discussions undertaken with the Planning Consultants and the theoretical understandings of the academic literature.

6.2.1   Previously Developed Land

New houses in the Green Belt have traditionally been prohibited, except upon sites where there was previously a building before (Thomas, 1963). Ratcliffe *et al.* (2009) therefore identifies that both planning and political agendas are putting increasing pressure on planners and developers to deliver housing on previously developed land, the most up-to-date definition of which is contained within the NPPF. As shown in **Figure 6**, 53% of new build residential developments in the Green Belt were built on previously developed land in 2017-18. Forming part of a more general pattern, Glenigan (2018) states that between April 2009 and March 2018, 58% of the residential units approved in the Green Belt in England were on previously developed land (Glenigan, 2018). In Tandridge, 29% of the total proposals submitted for minor residential developments in the Green Belt determined in the last five years comprised the redevelopment of previously developed land. For instance, when approving an application for

the demolition of existing buildings and the erection of a bungalow, the Planning Officer confirmed that "*the proposal would be appropriate in the Green Belt, constituting the redevelopment of previously developed land*" (Application Number: 2018/1566). Bibbly (2009) articulates that the majority of land used in new development schemes comprises parcels of previously developed land in which "*it is very difficult to build on the Green Belt unless you are redeveloping previously developed land*" (Planning Consultant A).

6.2.2 Limited Infilling in Villages

The Tandridge District contains a number of Green Belt settlements that have defined boundaries but that are washed over by the Green Belt (Tandridge District Council, 2008). In line with the NPPF, Policy DP12 of the Tandridge District Council Local Plan Part 2 confirms that infilling and other small-scale forms of redevelopment are considered appropriate within these Defined Villages of the Green Belt (Tandridge District Council, 2014). Drawing upon the primary research results, 21% of minor residential developments in the Green Belt decided in the last five years were located within one of the nine Defined Villages in Tandridge. Meanwhile, 5% of proposals were determined as comprising 'limited infilling' within a village in which such proposals have "*development on four sides and can thus reasonably be described as being limited infill*" (Application Number: 2018/2333). In questioning the definition of a village, Planning Consultant A referred to the case of Wood v Secretary of State for Communities and Local Government and Gravesham Borough Council (2015) in which the decision to refuse an outline planning permission for a single dwelling on appeal was successfully challenged in the High Court. It was found that villages do not necessarily accord with the settlement boundaries on Councils' Policies Maps where there is a need to consider the actual position on the ground. In addition, the assessment of whether a proposal constitutes 'limited infilling' in a village is a question of planning judgement to be determined by the decision-maker. In accordance with this case law, despite falling just outside the Tatsfield Village boundary in Tandridge, on appeal the Inspector assessed the actual position of the site on the ground whereby "*the appeal site is reasonably within the village's confines*" (Application Number: 2017/536). Therefore, as articulated by Planning Consultant A, the concept of limited infilling in villages is a prevailing policy consideration for approving small-scale residential developments in the Green Belt, in Tandridge, Surrey and England.

6.2.3 Very Special Circumstances

Paragraph 143 of the NPPF states that inappropriate development in the Green Belt "*should not be approved except in very special circumstances*" (MHCLG, 2019b, p.42). In compliance with national and local planning policy, Planning Consultant A therefore advised that developers should always seek to find 'very special circumstances' for proposals in the Green Belt. According to Watson (2019), there is not a uniform list of what constitutes 'very special circumstances', because such conditions will differ from site to site. This was reiterated by Planning Consultant B who confirmed that 'very special circumstances' are site specific. Planning Consultant A articulated that arguments for the existence of exceptional circumstances should resolve around planning considerations, as personal circumstances are not usually sufficient. For instance, "*you might have someone with a particular illness that needs to have a certain single-storey dwelling, but personal circumstances come and go, and they are limited to a timescale. It sounds harsh but you very rarely overcome planning objections with personal circumstances*". Determining whether 'very special circumstances' exist is therefore dependent on the balance of planning considerations in which individual circumstances must outweigh the harm to the Green Belt (Watson, 2019).

In Tandridge, only 4% of proposals for minor residential developments in the Green Belt over the last five years were approved at the local level following the demonstration of 'very special circumstances'. The majority of these applications were granted on the basis that the site benefitted from an extant planning permission where "*the proposal is considered to comprise inappropriate development within the Green Belt however due to the existence of very special circumstances in form of an extant planning permission it is considered that the proposal would have no greater impact upon the openness of the Green Belt*" (Application Number: 2014/980). In addition, the existence of a property's permitted development rights was considered to amount to very special circumstances in two separate instances in which "*this building could be extended under its permitted development rights and outbuildings could be erected under Class E*", thus the proposed development was considered more appropriate in terms of the impact on the openness of the Green Belt (Application Number: 2014/998). Excluding the exceptions to inappropriate development set out within national and local planning policy, the successful demonstration of 'very special circumstances' is evidently sporadic and not a frequent reason for granting planning permission.

6.3 Reasons for Refusal

The quantity of proposals granted planning permission in the Green Belt has evidently increased over the last five years, alongside the increase in the number of applications submitted. Nevertheless, the proportion of applications refused in the Green Belt in Tandridge has gradually increased in which 45% of proposals were considered to amount to 'inappropriate' development in the Green Belt and 52% of proposals were refused planning permission from July 2014 to July 2019. Elson (1986) determines that "*no other policy has such a strong presumption against development*" (p.xxv), stressing the importance of establishing the underlying reasons for refusing residential development schemes in the Green Belt.

6.3.1 Impact on the Openness of the Green Belt

The NPPF determines that "*the essential characteristics of Green Belts are their openness and their permanence*" (MHCLG, 2019b, p.40). However, in accordance with the views sought from Planning Consultant A, Mace (2018) infers that "*all development will impact openness*" (p.16) to an extent. This is evidenced by the sample of planning records analysed in NVivo, in which the most frequent reason for refusing minor residential developments in Tandridge was the resulting harm on the openness of the Green Belt (27%). Harm to the openness of the Green Belt is considered to arise in accordance with the "*scale, extent, and spread of built form across an extensive area of the site*" (Application Number: 2014/1568) and the "*introduction of a residential curtilage and the associated paraphernalia*" (Application Ref: 2014/1975). Planning Consultant A additionally considered "*the argument of visual amenity in the Green Belt in terms of openness*" with reference to the case of Turner v Secretary of State for Communities and Local Government and Anor (2016). Involving an application for the replacement of a mobile home and storage yard with a three-bedroom bungalow and associated residential curtilage, the Court found the word openness to be open-textured in which multiple elements are of relevance, depending on the specifics of individual cases. There is evidently a variety of components that constitute the multi-layered concept of openness including the extent of the existing built form, the visual dimension and the volumetric calculations. The consequential impacts of a proposal on the openness of the Green Belt is therefore highly complex in which the aesthetics of openness is no doubt a subjective planning consideration (Mace, 2018). Nonetheless, the impact of a development on the openness of the Green Belt is undoubtedly a principal planning matter, evidenced by the extensive number of proposals being refused in the Green Belt.

6.3.2 Unsustainable Location

In comparison to urban areas, Green Belts are often deemed unsustainable in which new developments are repeatedly criticised and subsequently refused for comprising the creation of isolated dwellings (Jeon *et al.*, 2018). Planning Consultant B expressed that "*Tandridge are very good at refusing applications for developments being within an unsustainable location*", coinciding with the primary research results where 17% of proposals for minor residential developments in the Green Belt were determined as being situated within unsustainable locations, far away from local shops, services and transport links. For instance, "*the residential units would be remote from key services, in an unsustainable location and reliant upon the private car*" (Application Number: 2018/246).

Nevertheless, Planning Consultant A referred to Paragraph 103 of the NPPF that asserts "*opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-taking*". (MHCLG, 2019b, p.30). Likewise, Planning Consultant B stated, "*the Government's definition of isolation and distance from public transport and things really doesn't apply to somewhere like Tandridge because nowhere in Tandridge is remote in the way that other parts of the UK are remote*". It was inferred that "*Surrey highways in particular should not be making those arguments or supporting Tandridge in those arguments*". Furthermore, Planning Consultant A questioned "*what is more sustainable: having development way out in a new settlement or having it on the edge on an existing settlement where you have existing services and existing railway stations?*". Thus, there are varying definitions of rurality whereby the Green Belt can be considered as relatively sustainable in transport terms, in comparison to England's wider countryside (Scott *et al.*, 2019). Seeking to clarify this planning matter, the case of Braintree District Council v Secretary of State for Communities and Local Government & Greyread Ltd & Granville Developments (2018) found isolated new homes to be defined as those "*far away from other places, buildings or people; remote*" (p.7). Hence, "*if there are dwellings in the vicinity… it then falls into the definition of it not being isolated. Some Council's, probably Tandridge, will argue differently, but that is what case law says*" (Planning Consultant A).

Whilst there is evidently some debate surrounding the interpretation of this policy, the consideration of a site being within an unsustainable location is a frequently employed reason for refusing proposals in Tandridge and across England. Mace (2018) logically explains that development should not be restricted in the Green Belt on sustainability terms, yet an

increasing number of proposals are refused on the basis of the site being situated within an unsustainable and isolated location, particularly at the local level.

6.3.3 Design, Character and Appearance

In his theory of the Garden City, Ebenezer Howard sought to preserve the character of rural areas through the implementation of Green Belts (Ratcliffe *et al.*, 2009). The quality of design and the loss of local distinctiveness is therefore a key concern that has emerged in the 21st Century, particularly in rural settlements (Scott *et al.*, 2019). One of the key purposes of the Green Belt, as set out within national planning policy, is "*to preserve the setting and special character of historic towns*" (MHCLG, 2019b, p.40). According to NE and CPRE (2010), house building is typically of low density in the Green Belt and the standardisation of urban development is not considered appropriate. In addition, Paragraph 130 of the NPPF states "*permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions*". (MHCLG, 2019b, p.39).

Utilising the NVivo categories created for the primary research purposes, 23% of proposals for minor residential schemes in the Green Belt in Tandridge were identified as having a detrimental impact on the character and appearance of the local area, whilst 9% were defined as constituting poor design, resulting in the refusal of planning permission. A proposal for the demolition of existing vacant workshops and garages and the erection of a pair of semi-detached dwellings and a block of four flats was determined by Planning Officers as failing "*to integrate effectively into their surroundings and would be appear as a cramped form of development which would be out of character with the open, rural character of the site and surrounding area, harmful to its landscape character and detrimental to the visual amenities of the area*" (Application Number: 2018/1430). The character and design of a development is therefore a key consideration in determining planning proposals in which Gunn (2007) recognises the conundrum of providing a sufficient number of high-quality homes in sustainable locations, in accordance with national and local planning policy.

6.4 The Future of the Green Belt

Employing Tandridge as the principle case study, there are evidently a variety of reasons for granting and refusing planning permission for residential developments in the Green Belt, creating great controversy between national government, public bodies, pressure groups and planning professionals. Planning Consultant B articulated that "*in my opinion, most planners, particularly in areas like Tandridge, have been naturally inclined to protect the Green Belt. They have a Committee of Members that are very much supportive of that basis… I think everyone interprets policy to achieve the ends they want to*". Both Planning Consultants described the Green Belt as a "*political hot potato*", referred to by Planning Consultant A as one "*that no-one really wants to tackle*". Hence, it is evident that Green Belt policy is engaged in conflicting political agendas, in which the land designation has generally maintained strong political support over time (Amati, 2016).

However, the limitations to the 'natural growth' of towns has long been a topic of controversy (Elliot, 1935). Urban containment has subsequently increased land and house prices where there is persistent undersupply of affordable housing, particularly in southern England (Barker, 2014). Current Green Belt policy is therefore interpreted by many as a 'stopping device' opposed to a device of control as first envisaged, leading to housing shortages and increases in land prices (Sturzaker and Mell, 2017). Looking into the future of Green Belt policy, Planning Consultant A declared *"Should it be amended? Yes"*. Furthermore, and contrary to widespread belief, the Green Belt is not an environmental designation, but a policy designation that seeks to restrict the development of the land (Toft, 1978). Planning Consultant B identified *"the danger of that is that the Green Belt is starting to enjoy protections that the countryside beyond the Green Belt doesn't… It's going to come as a shock to people that you will start seeing developments pop up beyond the Green Belt and they are probably going to be on more open land than the Green Belt"*. Additionally, Planning Consultant A noted *"there are some wonderful pieces of land that are not in the Green Belt but are actually more at risk from development"*. For instance, if planning permission is refused for proposals in the Green Belt, developers are more likely to 'leapfrog' the Green Belt and begin developing sites beyond (Ratcliffe *et al.*, 2009). The Green Belt therefore fails to restrict urban sprawl as development is leapfrogging into rural locations, encouraging less sustainable patterns of development (Amati and Yokohari, 2006; Gunn, 2007). Nevertheless, Planning Consultant B stated *"I can't see in my lifetime the Green Belt being given up, until we reach such an understanding of the housing crisis that people go, well, you've got to build there irrespective of what we called the*

land before". Therefore, Green Belt policy is likely to continue to operate as a dominant planning policy for many years, given its political and public popularity (Ratcliffe *et al*., 2009).

7 CONCLUSION

Sturzaker and Mell (2017) articulate that Green Belts are a very simple, yet extremely complex concept. This thesis has investigated the heightened discussions surrounding Green Belt policy in which multiple conflicting public, private, political and academic opinions exist. Having undertaken secondary data analysis, primary research into planning decisions and semi-structured interviews with two planning professionals, this project has analysed a variety of national, county and district Green Belt statistics, employing Surrey and Tandridge as unique case studies. This section seeks to summarise the key findings, presenting a clear understanding of Green Belt policy trends in the past, present and future.

7.1 Nibbling at the Green Belt

This research project has investigated the extent to which small-scale residential developments are eroding the Green Belt boundaries, at a national, county and district level. At a national scale, the extent of England's Green Belt is gradually decreasing and at a county level, the number of dwellings proposed to be built on the Green Belt in Surrey is increasing. In line with the statistical findings and the views sought from planning professionals, Carmona *et al.* (2003) articulates that the release of Green Belt land for development by local authorities is the primary reason for such large-scale Green Belt realignment. It is therefore difficult to decipher the extent to which small-scale residential developments are contributing to such major revisions of England's Green Belt boundaries.

The erosion of the Green Belt at a district level was assessed using a sample of minor residential schemes proposed in Tandridge's Green Belt in the last five years. In accordance with the findings presented by Glenigan (2018), the number of applications submitted has increased radically over time. Thus, the number of proposals granted planning permission in the Green Belt has intensified accordingly. However, following an analysis of the annual findings, the proportion of proposals refused planning permission exceeds those granted planning permission in Tandridge. It is therefore concluded that whilst small-scale residential developments are marginally contributing to the erosion of the Green Belt at a local level, the large-scale realignment of the Green Belt, that is the primary concern highlighted within academic literature, pressure group reports and political discussions, is predominantly a result

of Green Belt land being released by local authorities for major residential development projects.

7.2   Planning Policy Considerations

Employing a sample of proposals in the Green Belt in Tandridge, this thesis has examined the prevailing policy considerations employed in decision-making. It is determined that the extent of residential land in the Green Belt is increasing at a local level, however this is primarily through the redevelopment of previously developed land and through the conversion of existing buildings, as set out within national and local planning policy. Development that comprises limited infilling in villages is also frequently considered as an exception to inappropriate development, thus increasing the number of houses built on Green Belt land. Nevertheless, it is concluded that current policy set out within national and local planning policy guidance is highly effective in controlling development on the Green Belt, as evidenced by the proportion of proposals denied planning permission. The impact of development on the openness of the Green Belt is a multidimensional and complex planning consideration, with over a quarter of the sampled proposals being refused. In addition, developments situated within unsustainable locations are frequently refused in Tandridge, creating conflicting opinions about the sustainability of the Green Belt. The design, character and appearance of new residential development has also been identified as an important planning consideration. To summarise, Green Belt policy is open to interpretation in which the original meaning intended by the policy makers is often manipulated, dependent upon the professional and political agendas of developers and decision-makers.

7.3   Green Belt in the 21st Century and Beyond

The designation of the Green Belt continues to be undeniably successful in restricting urban sprawl in England (Gallent *et al.*, 2006). Mace (2018) determines that the Green Belt is ultimately associated with definitions of 'Englishness' in which the countryside is part of our national identity. However, Herington (1990) confirms that whilst the concept of the Green Belt is still relevant, "*Green Belt policy is hopelessly outdated*" (p.43) and is usually applied negatively in order to restrict development. Whilst house building in the Green Belt is a controversial topic, generating substantial public outcry, political debate and academic dispute, there is growing concern about the threat of development on the countryside beyond

the Green Belt. Formulating an interesting topic for further research, academic insight into the extent to which development is leapfrogging the Green Belt has emerged, highlighting the consequences of the continued implementation of the Green Belt on England's wider countryside.

Ratcliffe *et al.* (2009) confirms "*nationally, green belt policy serves an important purpose, but it must be the subject of continued review and reflection*" (p.223) where there is a general consensus from academics and planning professionals that the boundaries of the Green Belt should be revised. Academic research and government findings demonstrate a clear understanding of the pressing need for more high-quality housing in England and particularly in the south-east. Hence, national and local Green Belt policy should be carefully revised to ensure the English planning system takes a proactive approach in meeting the development needs of the country. Nevertheless, the realignment of England's Green Belt will no doubt continue to attract political resistance. Therefore, in reality, Green Belt policy is more than likely to remain the dominant policy in England, continuing to restrict the sprawl of large built-up areas until the housing crisis becomes so extreme that it can no longer be ignored (Mace, 2018).

8 BIBLIOGRAPHY

1. Alshenqeeti, H. (2014) Interviewing as a Data Collection Method: A Critical Review, *English Linguistics Research*, 3(1), pp.39-45.

2. Amati, M. (2016) Urban Green Belts in the Twenty-first Century, *Urban Planning and Environment*, Routledge, London.

3. Amati, M. and Yokohari, M. (2006) Temporal Changes and Local Variations in the Functions of the Green Belt, *Landscape and Urban Planning*, 75, pp.125-142.

4. Barker, K. (2006) *Barker Review of Land Use Planning: Final Report – Recommendations*, HMSO, London.

5. Barker, K. (2014) *Housing: Where's the Plan?* London Publishing Partnership, London.

6. Bibbly, P. (2009) Land Use Change in Britain, *Land Use Policy*, 26S, S2 – S13.

7. Bryman, A. and Burgess, R. G. (1994) Reflections on Qualitative Data Analysis. In: Bryman, A. and Burgess, R. G. (1994) *Analysing Qualitative Data,* Routledge, London.

8. Campaign to Protect Rural England (2014) *London's Green Belt and Metropolitan Open Land: Time for Renewal*, CPRE London Member Briefing.

9. Carmona, M., Carmona, S. and Gallent, N. (2003) *Delivering new homes: processes, planners and providers*, Routledge, London.

10. Cheshire, P. (2018) Broken Market or Broken Policy? The Unintended Consequences of Restrictive Planning, *National Institute Economic Review*, 245, pp.9-19.

11. Clark, G. (2005) Secondary Data. In: Flowerdew, R. and Martin, D. (2005) *Methods in Human Geography: A Guide for Students doing a Research Project*, Prentice Hall, pp.57-74.

12. Communities and Local Government (2011) Local Planning Authority Green Belt: England 2010/11, *Planning Statistical Release,* 15 April 2011, Communities and Local Government, London.

13. Crang, M. (2005) Analysing Qualitative Materials. In: Flowerdew, R. and Martin, D. ed. *Methods in Human Geography: A Guide for Students doing a Research Project*, Prentice Hall, pp.218-232.

14. Curley, R. (2019) *Tandridge District Council's money saving planning department restructure caused £350k overspend*, Surrey Live, 04 July 2019, https://www.getsurrey.co.uk/news/surrey-news/tandridge-district-councils-money-saving-16527042 (Accessed 18.08.19).

15. Department for Communities and Local Government (2012) Local Planning Authority Green Belt: England 2011/12, *Planning Statistical Release*, 30 November 2012, Department for Communities and Local Government, London.

16. Department for Communities and Local Government (2014a) Local Planning Authority Green Belt: England 2012/13, *Planning Statistical Release*, 07 March 2014, Department for Communities and Local Government, London.

17. Department for Communities and Local Government (2014b) Local Planning Authority Green Belt: England 2013/14, *Planning Statistical Release*, 16 October 2014, Department for Communities and Local Government, London.

18. Department for Communities and Local Government (2015a) Land Use Change Statistics in England: 2013/2014, *Land Use Statistical Release*, 06 August 2015, Department for Communities and Local Government, London.

19. Department for Communities and Local Government (2015b) Local Planning Authority Green Belt: England 2014/15, *Planning Statistical Release*, 01 October 2015, Department for Communities and Local Government, London.

20. Department for Communities and Local Government (2016a) Land Use Change Statistics in England: 2014/2015, *Land Use Statistical Release*, 31 March 2016, Department for Communities and Local Government, London.

21. Department for Communities and Local Government (2016b) Local Planning Authority Green Belt: England 2015/16, *Planning Statistical Release*, 08 September 2016, Department for Communities and Local Government, London.

22. Department for Communities and Local Government (2017a) Land Use Change Statistics in England: 2015/2016, *Land Use Statistical Release*, 02 March 2017, Department for Communities and Local Government, London.

23. Department for Communities and Local Government (2017b) Local Planning Authority Green Belt: England 2016/17, *Planning Statistical Release*, 07 September 2017, Department for Communities and Local Government, London.

24. Edhlund, B. and McDougall, A. G. (2012) *NVivo 10 essentials: your guide to the world's most powerful data analysis software*, Stallarholmen, Sweden.

25. Elliot, E. G. S. (1935) The Green Belt Round London, *The Town Planning Review*, 16(4), pp.316-318.

26. Elson, M. (1986) *Green Belts: Conflict Mediation in the Urban Fringe*, William Heinemann Ltd, London.

27. Fischer, F. and Forester, J. (1993) *The Argumentative Turn in Policy Analysis and Planning*, UCL Press, London.

28. Gallent, N., Andersson, J., and Bianconi, M. (2006) *Planning on the Edge: The Context for Planning at the Rural–Urban Fringe*, Routledge, London.

29. Gallent, N. and Tewdwr-Jones, M. (2007) *Decent Homes for All: Planning's Evolving Role in Housing Provision*, Routledge, London.

30. Gallent, N., Hamiduddin, I., Stirling, P. and Kelsey, J. (2019) Prioritising local housing needs through land-use planning in rural areas: Political theatre or amenity protection? *Journal of Rural Studies*, 6, pp.11-20, Elsevier.

31. Glenigan (2018) *The Use of Greenfield and Brownfield Land in Greenbelt Housing & Commercial Projects*, Prepared for Campaign for the Protection of Rural England.

32. Gregory, I. (2003) *Ethics in Research*, Continuum, London.

33. Gregory, D., Johnston, R., Pratt, G., Watts, M. J. and Whatmore, S. (2009) *The Dictionary of Human Geography*, Wiley, Blackwell.

34. Grimwood, G. G. and Barton, C. (2019) *Green Belt*, Briefing Paper Number 00934, House of Commons Library.

35. Gubrium, J. F. and Holstein, J. A. (2001) *Handbook of Interview Research*, SAGE.

36. Gunn, S. C. (2007) Green Belts: A Review of the Region's Responses to a Changing Housing Agenda, *Journal of Environmental Planning and Management*, 50(5), pp. 595-616.

37. Hajer, M. A. and Wagenaar, H. (2003) *Deliberative Policy Analysis: Understanding Governance in the Network Society*, Cambridge University Press, Cambridge.

38. Hall, P. (1974) The Containment of Urban England, *The Geographical Journal*, 140(3), pp.486-408.

39. Herington, J. (1990) *Beyond Green Belts: Managing Urban Growth in the 21st Century*, Regional Studies Association and Jessica Kingsley Publishers, London.

40. Howard, E. (1902) *Garden Cities of To-morrow*, Swan Sonnenschein & Co. Ltd, London.

41. Hult, F. M. and Johnson, D. C. (2015) *Research Methods in Language Policy and Planning: A Practical Guide*, John Wiley & Sons, West Sussex.

42. Jeon, S., Hong, H. and Kang, S. (2018) Simulation of Urban Growth and Urban Living Environment with Release of the Green Belt, *Sustainability*, 10(9), 3260.

43. Johnson, T. (2018) *'With many green belt developments on the way it's high time we started to defend our countryside'*, Surrey Live, https://www.getsurrey.co.uk/news/surrey-news/with-many-green-belt-developments-14785462 (Accessed 30.03.19).

44. Landscape Institute (2018) *Green Belt Legislation: A History*, Landscape institute, https://www.landscapeinstitute.org/policy/green-belt-policy/ (Accessed 30.06.19).

45. Little. T. D. (2013) *The Oxford Handbook of Quantitative Methods in Psychology, Volume 2: Statistical Analysis*, Oxford University Press, Oxford.

46. London First (2015) *The Green Belt: A Place for Londoners?* London First, London.

47. London Green Belt Council (2016) *Safe Under Us: An Investigation into Widespread Threats from Housebuilding in London Metropolitan Green Belt*, September 2016.

48. London Green Belt Council (2017) *The Accelerating Loss of London's Green Belt – Who is to Blame? 'Safe Under Us?' One Year On: A Review of Current Threats*, September 2017.

49. London Green Belt Council (2019a) Further Serious Loss of London's Green Belt, *'Safe Under Us'? – Two Years On*, January 2019.

50. London Green Belt Council (2019b) *London Green Belt Council*, http://londongreenbeltcouncil.org.uk/ (Accessed 19.05.19).

51. Lowe, C. and Zemliansky, P. (2011) *Writing Spaces: Readings on Writing*, Parlor Press, South Carolina.

52. Mace, A., Blanc, F., Gordon, I and Scanlon, K. (2016) *A 21st Century Metropolitan Green Belt*, The London School of Economics and Political Science, London.

53. Mace, A. (2018) The Metropolitan Green Belt, Changing an Institution, *Progress in Planning*, 121, pp.1-28.

54. Mandelker, D. R. (1962) *Green Belts and Urban Growth*, English Town and Country Planning in Action, The University of Wisconsin Press, Wisconsin.

55. Ministry of Housing, Communities and Local Government (2018a) Land Use Change Statistics in England: 2016/2017, *Land Use Statistical Release*, 31 May 2018, Ministry of Housing, Communities and Local Government, London.

56. Ministry of Housing, Communities & Local Government (2018b) Local Planning Authority Green Belt: England 2017/18, *Planning Statistical Release*, 4 October 2018, Ministry of Housing, Communities and Local Government, London.

57. Ministry of Housing, Communities & Local Government (2019a) Land Use Change Statistics in England: 2017/2018, *Land Use Statistical Release*, 31 May 2019, Ministry of Housing, Communities and Local Government, London.

58. Ministry of Housing, Communities & Local Government (2019b) *National Planning Policy Framework*, Ministry of Housing, Communities and Local Government, London.

59. Moore, R. (2014) *It is time to rethink Britain's Green Belt?* The Observer: Planning Policy, The Guardian, 19 October 2014, https://www.theguardian.com/politics/2014/oct/19/is-it-time-to-rethink-the-green-belt (Accessed 21.05.19).

60. Munton, R. (1983) *London's Green Belt: Containment in Practice*, Routledge, London.

61. Natural England and Campaign to Protect Rural England (2010) *Green Belt: A Greener Future*, A Report by Natural England and the Campaign to Protect Rural England, Report NE196.

62. North Mymms District Green Belt Society (2005) *Green Belts: A Brief History*, March 2005, http://www.greenbeltsociety.org.uk/history/ (Accessed 30.06.19).

63. QSR International (2019) *What is NVIVO?* QSR International Pty Ltd, http://www.qsrinternational.com/what-is-nvivo (Accessed 25.03.19).

64. Ratcliffe, J., Stubbs, M. and Keeping, M. (2009) *Urban Planning and Real Estate Development*, Routledge, New York.

65. RTPI (2014) *Planning London: From Julius Caesar to Boris Johnson*, RTPI London Centenary Series.

66. Satsangi, M., Gallent, N. and Bevan, M. (2010) *The Rural Housing Question*, The Policy Press, Bristol.

67. Schwartz-Shea, P. and Yanow, D. (2012) *Interpretive Research Design: Concepts and Processes*, Routledge, London.

68. Scott, M., Gallent, N. and Gkartzios, M. (2019) *The Routledge Companion to Rural Planning, Routledge*, New York and London.

69. Shucksmith, M. (1990) *Housebuilding in Britain's Countryside*, Routledge, London.

70. Sturzaker, J. and Mell, I. (2017) *Green Belts: Past; Present; Future?* Routledge Studies in Urbanism and the City, Routledge, London.

71. Tandridge District Council (2008) *Core Strategy*, Adopted 15 October 2008.

72. Tandridge District Council (2014) *Local Plan Part 2: Detailed Policies 2014-2029*, Adopted July 2014.

73. Tandridge District Council (2019) *Our Local Plan: 2033*, Regulation 22 Submission, January 2019.

74. Thomas, D. (1963) London's Green Belt: The Evolution of an Idea, *The Geographical Journal*, 129(1), pp. 14-24.

75. Toft, D. (1978) Green Belt and the Urban Fringe, *Built Environment*, 21(1), pp.54-59.

76. Trochim, W. M., Donnelly, J. P. and Arora, K. (2015) *Research Methods: The Essential Knowledge Base*, Cengage Learning, Boston.

77. Trzesniewski, K., Donnellan, M. and Lucas, R. (2011) *Secondary Data Analysis: An Introduction for Psychologists,* American Psychological Association, Washington, D.C.

78. Valentine, G. (2005) Tell me about...: using interviews as a research methodology. In: Flowerdew, R. and Martin, D. (2005) *Methods in Human Geography: A Guide for Students doing a Research Project*, Prentice Hall, pp.110-126.

79. Watson, S. (2019) *Ten Circumstances 'Special' Enough to Justify Green Belt Development*, Planning Resource, 13 March 2019, https://www.planningresource.co.uk/article/1578942/ten-circumstances-special-enough-justify-green-belt-development (Accessed 19.08.19).

80. Yanow, D. (2000) *Conducting Interpretive Policy Analysis, SAGE,* Thousand Oaks.

9 APPENDICES

Appendix 1: Interview Questions

Appendix 2: Participant Information Sheet

Appendix 3: Consent Form Template

Appendix 4: Risk Assessment Form

Appendix 5: Tandridge Applications and Appeals (31 July 2014 – 31 July 2019)

Appendix 1: Interview Questions

Q1: How often to you deal with planning applications and appeals in the Green Belt, in Surrey, and in Tandridge?

Q2: Are you aware of the percentage of England's land area that is Green Belt? Do you think this has increased or decreased over the last 10 years?

Q3: Do you know the primary cause of this reduction in Green Belt?

Q4: Do you often partake in Local Plan reviews and consultations that involve the allocation of Green Belt land for development?

Q5: Do you think the number of applications and appeals for minor residential developments in the Green Belt is increasing or decreasing?

Q6: Are you aware of how many proposals for minor residential developments in the Green Belt are approved? Do you think this has increased or decreased in the last five years?

Q7: Are you able to explain the impact of proposals on the openness of the Green Belt?

Q8: Are you aware of arguments for and against the concept of 'isolated' dwellings within 'unsustainable' locations?

Q9: Can you explain the concept of previously developed land?

Q10: How often to you see reference to 'very special circumstances' in Green Belt proposals?

Q11: Do you think Green Belt policy and the restrictions on Green Belt land will be permanent or do you see scope for some flexibility?

Appendix 2: Participant Information Sheet

Participant Information Sheet

Project Title: Nibbling at the Green Belt: An Investigation into the Impacts of Small-Scale Residential Development

Researcher: Emily Hall

Introduction

You are being invited to take part in a research project being undertaken by a Masters Student from the Bartlett School of Planning, University College London (UCL).

Before you decide whether or not to participate it is important for you to understand why the research is being conducted and what participation will involve. Please read the following information carefully, feel free to discuss it with others if you wish, or ask the research team for clarification or further information. Please take time to decide whether or not you wish to take part.

Why is this research being conducted?

This research project seeks to examine the ongoing controversy of Green Belt policy in the 21st Century. The aim of this thesis is to establish the extent to which minor residential developments are eroding the Green Belt at national, county and district level. In determining small-scale residential developments in the Green Belt, this project seeks to understand the prevailing policy considerations used in practice. Furthermore, this thesis aims to uncover the importance of small-scale realignment of the Green Belt and the wider impacts on its preservation.

Why am I being invited to take part?

You are being invited to take part in this research project due to your experience in dealing with Green Belt policy. Your professional views are sought in order to gain an informed understanding of Green Belt policy in practice. It is envisaged that your everyday experiences in planning will assist in validating and/or challenging the primary research results found, thus contributing significantly to this research project.

Do I have to participate?

Participation is entirely voluntary. If you do choose to participate and then change your mind, you may withdraw from the research at any time with no consequences and without having to give a reason.

What will happen if I choose to take part?

If you do choose to participate, you will be invited to face-to-face interview to explore the issues highlighted above. The interview will be conducted at a mutually agreed location. The interview will last approximately 30 minutes and will be audio recorded (and transcribed at a later date). You will have the opportunity to see the interview transcript and agree any amendments with the researcher after the interview is concluded. Travel and subsistence expenses are not offered for participation.

What are the advantages of taking part?

There are no immediate benefits for participating in this project and no financial incentive or reward is offered. However, it is hoped that this project will inform a greater understanding of Green Belt policy in

practice, clarifying areas of controversy that current exist within the academic world, the media and politics. It is hoped that this research project will uncover the extent to which small-scale residential developments are eroding England's Green Belt land and the subsequent impacts of this.

What are the possible disadvantages of taking part?

We anticipate no significant disadvantages associated with taking part in this project. If you experience any unexpected adverse consequences as a result of taking part in the project you are encouraged to contact the researcher as soon as possible using the contact details on Page 2 of this information sheet.

If I choose to take part, what will happen to the data?

The interview data will be anonymised at the point of transcription and identified by a general identifier (e.g. 'Planning Officer A' or 'Planning Consultant B'). A record of participant identities and any notes will be kept separately and securely from the anonymised data. All data and information affiliated with this project will be securely stored on an encrypted computer drive and physical documents will be stored securely on University property.

The data will be only used for the purposes of this research and relevant outputs and will not be shared with any third party. The anonymised data may be utilised in the written dissertation produced at the end of this project, and this dissertation may then be made publicly available via the University Library's Open Access Portal, however no identifiable or commercial sensitive information will be accessible in this way.

What will happen to the results of the research project?

It is anticipated that the data collected in this project will be included in the dissertation produced at the end of this project, submitted for the award of a Masters degree at University College London (UCL). You will not be personally identified in any of the outputs from this work, and attributions and quotations will be anonymised. If you would like to receive an electronic copy of any outputs stemming from this project, please ask the contact below who will be happy to provide this.

Contact Details

If you would like more information or have any questions or concerns about the project or your participation, please use the contact details below:

Primary contact	Emily Hall
Role	MSc Spatial Planning Student
Email	Emily.Hall.17@ucl.ac.uk

Supervisor	Yvonne Rydin
Role	MSc Spatial Planning Dissertation Supervisor
Email	Y.Rydin@ucl.ac.uk

Telephone   0203 1089 562

Concerns and / or Complaints

If you have concerns about any aspect of this research project please contact the MSc Student in the first instance, then escalate to the supervisor.

Appendix 3: Consent Form Template

Informed Consent Sheet

Nibbling at the Green Belt: An Investigation into the Impacts of Small-Scale Residential Development

If you are happy to participate, please complete this consent form by ticking the boxes to acknowledge the following statements and signing your name at the bottom of the page.

Please give the signed form to the researcher conducting your interview at the interview. They will also be able to explain this consent form further with you, if required.

1.	I have read and understood the information sheet.	☐
2.	I agree to participate in the above research by attending a face-to-face interview as described on the Information Sheet.	☐
3.	I understand that my participation is entirely voluntary.	☐
4.	I understand that I may withdraw at any time without giving a reason and with no consequences.	☐
5.	I agree for the interview to be audio recorded.	☐
6.	I understand that I may see a copy of the interview transcript after it has been transcribed and agree any amendments with the researcher.	☐
7.	I understand that the intention is that interviews are anonymised and that if any of my words are used in a research output that they will not be directly attributed to me unless otherwise agreed by all parties.	☐
8.	I understand the data from this project will be considered for repository in the UCL Open Access repository as described on the Information Sheet but that this will be anonymised data only.	☐
9.	I understand that I can contact the student who interviewed me at any time using the email address they contacted me on to arrange the interview, or the dissertation supervisor using the contact details provided on Page 3 of the information sheet.	☐

Participant name: **Signature:**   **Date:**

Researcher name: **Signature:**   **Date:**

Appendix 4: Risk Assessment Form

RISK ASSESSMENT FORM
FIELD / LOCATION WORK

UCL

The Approved Code of Practice - Management of Fieldwork should be referred to when completing this form
http://www.ucl.ac.uk/estates/safetynet/guidance/fieldwork/acop.pdf

DEPARTMENT/SECTION BARTLETT SCHOOL OF PLANNING

LOCATION(S) UCL (LONDON), SURREY COUNTY COUNCIL COUNTY HALL (KINGSTON), TANDRIDGE DISTRICT COUNCIL OFFICES (OXTED)

PERSONS COVERED BY THE RISK ASSESSMENT EMILY HALL

BRIEF DESCRIPTION OF FIELDWORK SECONDARY DATA ANALYSIS AND INTERVIEWS

Consider, in turn, each hazard (white on black). If **NO** hazard exists select **NO** and move to next hazard section.
If a hazard does exist select **YES** and assess the risks that could arise from that hazard in the risk assessment box.
Where risks are identified that are not adequately controlled they must be brought to the attention of your Departmental Management who should put temporary control measures in place or stop the work. Detail such risks in the final section.

ENVIRONMENT	The environment always represents a safety hazard. Use space below to identify and assess any risks associated with this hazard
e.g. location, climate, terrain, neighbourhood, in outside organizations, pollution, animals.	Examples of risk: adverse weather, illness, hypothermia, assault, getting lost. Is the risk high / medium / low ? NO.

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

- ☐ work abroad incorporates Foreign Office advice
- ☐ participants have been trained and given all necessary information
- ☐ only accredited centres are used for rural field work
- ☐ participants will wear appropriate clothing and footwear for the specified environment
- ☐ trained leaders accompany the trip
- ☐ refuge is available
- ☐ work in outside organisations is subject to their having satisfactory H&S procedures in place
- ☐ OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

EMERGENCIES	Where emergencies may arise use space below to identify and assess any risks
e.g. fire, accidents	Examples of risk: loss of property, loss of life

NO.

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

- ☐ participants have registered with LOCATE at http://www.fco.gov.uk/en/travel-and-living-abroad/
- ☐ fire fighting equipment is carried on the trip and participants know how to use it
- ☐ contact numbers for emergency services are known to all participants
- ☐ participants have means of contacting emergency services
- ☐ participants have been trained and given all necessary information
- ☐ a plan for rescue has been formulated, all parties understand the procedure
- ☐ the plan for rescue /emergency has a reciprocal element
- ☐ OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

EQUIPMENT	Is equipment used?	No	If 'No' move to next hazard If 'Yes' use space below to identify and assess any risks
e.g. clothing, outboard motors.	Examples of risk: inappropriate, failure, insufficient training to use or repair, injury. Is the risk high / medium / low ?		

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

- ☐ the departmental written Arrangement for equipment is followed
- ☐ participants have been provided with any necessary equipment appropriate for the work
- ☐ all equipment has been inspected, before issue, by a competent person
- ☐ all users have been advised of correct use
- ☐ special equipment is only issued to persons trained in its use by a competent person
- ☐ OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

LONE WORKING	Is lone working a possibility?	No	If 'No' move to next hazard If 'Yes' use space below to identify and assess any risks
e.g. alone or in isolation lone interviews.	Examples of risk: difficult to summon help. Is the risk high / medium / low?		

CONTROL MEASURES	Indicate which procedures are in place to control the identified risk

- ☐ the departmental written Arrangement for lone/out of hours working for field work is followed
- ☐ lone or isolated working is not allowed
- ☐ location, route and expected time of return of lone workers is logged daily before work commences
- ☐ all workers have the means of raising an alarm in the event of an emergency, e.g. phone, flare, whistle
- ☐ all workers are fully familiar with emergency procedures
- ☐ OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

ILL HEALTH

e.g. accident, illness, personal attack, special personal considerations or vulnerabilities.

The possibility of ill health always represents a safety hazard. Use space below to identify and assess any risks associated with this Hazard.

Examples of risk: injury, asthma, allergies. Is the risk high / medium / low?

NO.

CONTROL MEASURES — Indicate which procedures are in place to control the identified risk

- [ ] an appropriate number of trained first-aiders and first aid kits are present on the field trip
- [ ] all participants have had the necessary inoculations/ carry appropriate prophylactics
- [ ] participants have been advised of the physical demands of the trip and are deemed to be physically suited
- [ ] participants have been adequate advice on harmful plants, animals and substances they may encounter
- [ ] participants who require medication have advised the leader of this and carry sufficient medication for their needs
- [ ] OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

TRANSPORT

e.g. hired vehicles

Will transport be required	NO		Move to next hazard
	YES		Use space below to identify and assess any risks

Examples of risk: accidents arising from lack of maintenance, suitability or training
Is the risk high / medium / low?
NO.

CONTROL MEASURES — Indicate which procedures are in place to control the identified risk

- [ ] only public transport will be used
- [ ] the vehicle will be hired from a reputable supplier
- [ ] transport must be properly maintained in compliance with relevant national regulations
- [ ] drivers comply with UCL Policy on Drivers http://www.ucl.ac.uk/hr/docs/college_drivers.php
- [ ] drivers have been trained and hold the appropriate licence
- [ ] there will be more than one driver to prevent driver/operator fatigue, and there will be adequate rest periods
- [ ] sufficient spare parts carried to meet foreseeable emergencies
- [ ] OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

DEALING WITH THE PUBLIC

e.g. interviews, observing

Will people be dealing with public	No	If 'No' move to next hazard
		If 'Yes' use space below to identify and assess any risks

Examples of risk: personal attack, causing offence, being misinterpreted. Is the risk high / medium / low?

CONTROL MEASURES — Indicate which procedures are in place to control the identified risk

- [ ] all participants are trained in interviewing techniques
- [ ] interviews are contracted out to a third party
- [ ] advice and support from local groups has been sought
- [ ] participants do not wear clothes that might cause offence or attract unwanted attention
- [ ] interviews are conducted at neutral locations or where neither party could be at risk
- [ ] OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

WORKING ON OR NEAR WATER	**Will people work on or near water?**	No	**If 'No' move to next hazard** **If 'Yes' use space below to identify and assess any risks**
e.g. rivers, marshland, sea.	Examples of risk: drowning, malaria, hepatitis A, parasites. Is the risk high / medium / low?		

CONTROL MEASURES	**Indicate which procedures are in place to control the identified risk**
☐	lone working on or near water will not be allowed
☐	coastguard information is understood; all work takes place outside those times when tides could prove a threat
☐	all participants are competent swimmers
☐	participants always wear adequate protective equipment, e.g. buoyancy aids, wellingtons
☐	boat is operated by a competent person
☐	all boats are equipped with an alternative means of propulsion e.g. oars
☐	participants have received any appropriate inoculations
☐	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

MANUAL HANDLING (MH)	**Do MH activities take place?**	No	**If 'No' move to next hazard** **If 'Yes' use space below to identify and assess any risks**
e.g. lifting, carrying, moving large or heavy equipment, physical unsuitability for the task.	Examples of risk: strain, cuts, broken bones. Is the risk high / medium / low?		

CONTROL MEASURES	**Indicate which procedures are in place to control the identified risk**
☐	the departmental written Arrangement for MH is followed
☐	the supervisor has attended a MH risk assessment course
☐	all tasks are within reasonable limits, persons physically unsuited to the MH task are prohibited from such activities
☐	all persons performing MH tasks are adequately trained
☐	equipment components will be assembled on site
☐	any MH task outside the competence of staff will be done by contractors
☐	OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

SUBSTANCES	**Will participants work with substances**	**No**	**If 'No' move to next hazard** **If 'Yes' use space below to identify and assess any risks**
e.g. plants, chemical, biohazard, waste	Examples of risk: ill health - poisoning, infection, illness, burns, cuts. Is the risk high / medium / low?		

CONTROL MEASURES	**Indicate which procedures are in place to control the identified risk**

- [ ] the departmental written Arrangements for dealing with hazardous substances and waste are followed
- [ ] all participants are given information, training and protective equipment for hazardous substances they may encounter
- [ ] participants who have allergies have advised the leader of this and carry sufficient medication for their needs
- [ ] waste is disposed of in a responsible manner
- [ ] suitable containers are provided for hazardous waste
- [ ] OTHER CONTROL MEASURES: please specify any other control measures you have implemented:

OTHER HAZARDS	**Have you identified any other hazards?**	**No**	**If 'No' move to next section** **If 'Yes' use space below to identify and assess any risks**
i.e. any other hazards must be noted and assessed here.	Hazard: Risk: is the risk		

CONTROL MEASURES	**Give details of control measures in place to control the identified risks**

Have you identified any risks that are not adequately controlled?	**NO** ☒ **YES** ☐	**Move to Declaration** **Use space below to identify the risk and what action was taken**

Is this project subject to the UCL requirements on the ethics of Non-NHS Human Research?   No

If yes, please state your Project ID Number

For more information, please refer to: http://ethics.grad.ucl.ac.uk/

DECLARATION	The work will be reassessed whenever there is a significant change and at least annually. Those participating in the work have read the assessment.

Select the appropriate statement:

- [x] I the undersigned have assessed the activity and associated risks and declare that there is no significant residual risk
- [ ] I the undersigned have assessed the activity and associated risks and declare that the risk will be controlled by the method(s) listed above

NAME OF SUPERVISOR YVONNE RYDIN

SIGNATURE OF SUPERVISOR   DATE

Appendix 5: Tandridge Applications and Appeals (31 July 2014 – 31 July 2019)

Application Number	Net Dwellings	Decision	Appeal
31 July 2014 – 31 July 2015			
1 2014/1568	8	Refused (18 December 2014)	
2 2014/158	1	Refused (06 March 2015)	Dismissed (22 March 2016)
3 2014/290	4	Granted (05 September 2014)	
4 2014/802	1	Granted (17 September 2014)	
5 2014/946	1	Granted (19 September 2014)	
6 2014/980	1	Granted (27 August 2014)	
7 2014/998	1	Granted (18 September 2014)	
8 2014/1026	1	Granted (19 August 2014)	
9 2014/1242	7	Refused (10 October 2014)	
10 2014/1372	2	Granted (28 November 2014)	
11 2014/1480	1	Refused (14 November 2014)	Dismissed (01 February 2016)
12 2014/1576	7	Refused (27 November 2014)	Dismissed (14 December 2015)
13 2014/1592	3	Refused (04 February 2015)	
14 2014/1612	2	Refused (27 November 2014)	
15 2014/1684	1	Granted (29 April 2015)	
16 2014/1696	3	Refused (23 December 2014)	
17 2014/1782	4	Refused (02 February 2015)	
18 2014/1844	5	Granted (27 February 2015)	
19 2014/1975	1	Refused (04 March 2015)	
20 2014/2019	1	Granted (13 February 2015)	
21 2014/2028	1	Granted (25 February 2015)	
22 2014/2051	1	Granted (24 February 2015)	
23 2015/34	9	Refused (05 June 2015)	
24 2015/43	1	Refused (01 May 2015)	Dismissed (25 February 2016)

25	2015/174	1	Granted (29 April 2015)	
26	2015/184	9	Granted (27 July 2015)	
27	2015/196	1	Refused (06 May 2015)	
28	2015/468	1	Granted (08 May 2015)	
29	2015/646	4	Refused (03 July 2015)	Dismissed (08 March 2016)
30	2015/911	1	Granted (13 July 2015)	

31 July 2015 – 31 July 2016				
31	2013/1485	4	Refused (05 October 2015)	
32	2014/1138	2	Granted (23 March 2016)	
33	2014/1353	2	Refused (03 September 2015)	Dismissed (14 June 2016)
34	2014/1794	5	Refused (08 January 2016)	
35	2015/515	1	Refused (04 September 2015)	Dismissed (27 June 2016)
36	2015/559	5	Refused (17 September 2015)	
37	2015/623	1	Refused (07 September 2015)	Dismissed (24 October 2016)
38	2015/849	1	Refused (16 November 2015)	
39	2015/851	7	Granted (31 July 2015)	
40	2015/931	1	Granted (04 September 2015)	
41	2015/979	8	Refused (08 January 2016)	Dismissed (14 December 2015)
42	2015/1173	1	Refused (21 August 2015)	
43	2015/1174	2	Refused (30 October 2015)	
44	2015/1209	1	Refused (02 October 2015)	
45	2015/1343	1	Granted (16 February 2016)	
46	2015/1388	1	Refused (09 November 2015)	Dismissed (13 May 2016)
47	2015/1440	2	Granted (07 October 2015)	
48	2015/1527	1	Granted (21 October 2015)	
49	2015/1538	1	Refused (03 November 2015)	

50	2015/1596	1	Granted (15 December 2015)	
51	2015/1754	1	Granted (18 November 2015)	
52	2015/1791	1	Granted (21 April 2016)	
53	2015/1797	4	Refused (22 February 2016)	
54	2015/1902	1	Granted (15 December 2015)	
55	2015/1923	1	Granted (10 February 2016)	
56	2015/1927	3	Granted (31 December 2015)	
57	2015/2027	4	Granted (13 January 2016)	
58	2015/2053	1	Granted (07 July 2016)	
59	2015/2133	3	Refused (08 February 2016)	
60	2015/2179	2	Granted (18 March 2016)	
61	2015/2225	2	Granted (11 March 2016)	
62	2015/2252	6	Granted (06 June 2016)	
63	2015/2268	1	Refused (26 February 2016)	Dismissed (05 September 2016)
64	2016/27	1	Granted (15 July 2016)	
65	2016/139	3	Granted (21 March 2016)	
66	2016/207	1	Granted (12 May 2016)	
67	2016/382	1	Granted (13 June 2016)	
68	2016/493	1	Granted (18 May 2016)	
69	2016/541	1	Refused (06 June 2016)	
70	2016/762	4	Refused (15 July 2016)	
		31 July 2016 – 31 July 2017		
71	2015/1575	8		Allowed (19 May 2016)
72	2015/1709	1	Granted (11 August 2016)	
73	2016/170	2	Granted (14 October 2016)	
74	2016/204	1	Refused (11 February 2016)	Dismissed (23 February 2017)

75	2016/503	2	Refused (22 March 2016)	Dismissed (05 June 2017)
76	2016/547	1	Granted (12 August 2016)	
77	2016/553	5	Granted (04 October 2016)	
78	2016/640	8	Refused (08 September 2016)	
79	2016/925	1	Refused (27 May 2016)	Dismissed (01 June 2017)
80	2016/987	9	Granted (01 November 2016)	
81	2016/1011	1	Refused (04 June 2016)	Dismissed (13 January 2017)
82	2016/1087	1	Granted (21 September 2016)	
83	2016/1098	5	Granted (31 August 2016)	
84	2016/1245	2	Refused (25 November 2016)	
85	2016/1262	2	Refused 08 July 2016)	Dismissed (17 March 2017)
86	2016/1334	3	Granted (28 October 2016)	
87	2026/1353	1	Granted (15 March 2017)	
88	2016/1405	1	Refused (16 November 2016)	
89	2016/1577	1	Granted (09 November 2016)	
90	2016/1595	1	Granted (15 December 2016)	
91	2016/1622	4	Granted (21 February 2017)	
92	2016/1636	2	Granted (22 November 2016)	
93	2016/1657	1	Granted (14 December 2016)	
94	2016/1665	1	Refused (05 September 2016)	Dismissed (18 July 2017)
95	2016/1684	4	Granted (09 February 2017)	
96	2016/1739	1	Granted (12 December 2016)	
97	2016/1789	1	Refused (26 January 2017)	
98	2016/1814	1	Refused (28 April 2017)	
99	2016/1877	3	Refused (05 April 2017)	
100	2016/1960	1	Granted (20 January 2017)	
101	2016/1975	4	Granted (26 January 2017)	

102	2016/2005	1	Granted (06 January 2017)	
103	2016/2131	1	Refused (03 March 2017)	
104	2016/2185	6	Granted (31 January 2017)	
105	2016/2317	7	Granted (03 March 2017)	
106	2016/2373	2	Granted (10 March 2017)	
107	2017/60	3	Granted (28 April 2017)	
108	2017/194	3	Refused (03 May 2017)	
109	2017/298	1	Granted (15 Ma7 2017)	
110	2017/333	1	Granted (13 April 2017)	
111	2017/336	8	Granted (01 June 2017)	
112	2017/420	3	Granted (26 April 2017)	
113	2017/461	1	Granted (23 June 2017)	
114	2017/749	2	Refused (20 June 2017)	
115	2017/783	2	Refused (19 July 2017)	
31 July 2017 – 31 July 2018				
116	2016/1840	9	Refused (30 September 2016)	Dismissed (02 November 2017)
117	2016/1971	1	Refused (19 October 2016)	Dismissed (18 August 2017)
118	2016/2138	9	Refused (14 November 2016)	Dismissed (29 August 2017)
119	2016/2142	1	Refused (04 November 2016)	Allowed (17 August 2017)
120	2016/2375	1	Refused (16 November 2016)	Dismissed (22 December 2017)
121	2016/2430	1	Refused (15 September 2017)	
122	2017/196	2	Refused (30 July 2018)	
123	2017/314	1	Refused (29 November 2016)	Dismissed (05 March 2018)
124	2017/536	1	Refused (24 January 2017)	Dismissed (19 January 2018)
125	2017/563	1	Refused (17 March 2017)	Dismissed (09 March 2018)
126	2017/751	1	Refused (12 June 2018)	

127	2017/886	2	Granted (24 August 2017)	
128	2017/930	2	Refused (23 March 2018)	
129	2017/1006	1	Refused (12 May 2017)	Dismissed (23 May 2018)
130	2017/1154	1	Granted (24 November 2017)	
131	2017/1296	9	Granted (14 September 2017)	
132	2017/1405	1	Granted (23 October 2017)	
133	2017/1707	3	Granted (11 October 2017)	
134	2017/1771	1	Granted (17 October 2017)	
135	2017/1889	2	Refused (15 December 2017)	
136	2017/1921	3	Refused (12 December 2017)	
137	2017/2022	4	Granted (01 February 2018)	
138	2017/2074	3	Refused (04 December 2017)	
139	2017/2284	1	Granted (05 February 2018)	
140	2017/2400	2	Refused (22 June 2018)	
141	2017/2404	1	Granted (16 February 2018)	
142	2017/2412	1	Granted (08 February 2018)	
143	2017/2502	1	Granted (02 February 2018)	
144	2017/2637	1	Refused (22 May 2018)	
145	2018/56	1	Refused (29 May 2018)	
146	2018/246	4	Refused (29 March 2018)	
147	2018/258	1	Refused (25 April 2018)	
148	2018/373	9	Refused (31 July 2018)	
149	2018/458	1	Refused (21 June 2018)	
150	2018/765	3	Refused (19 June 2018)	
151	2018/873	2	Refused (27 June 2018)	
152	2018/899	2	Refused (13 July 2018)	
31 July 2018 – 31 July 2019				

153	2017/212	9	Granted (15 July 2019)	
154	2017/1201	7	Refused (31 October 2017)	Dismissed (10 August 2018)
155	2017/1220	4	Refused (11 June 2017)	Dismissed (29 August 2018)
156	2017/1614	1	Refused (26 July 2017)	Dismissed (26 October 2018)
157	2017/1625	2	Granted (12 September 2018)	
158	2017/1662	1	Refused (01 August 2017)	Dismissed (24 December 2018)
159	2017/1809	1	Refused (26 August 2018)	Dismissed (19 September 2018)
160	2017/1820	1	Refused (29 June 2017)	Dismissed (24 October 2018)
161	2017/2150	2	Granted (28 September 2018)	
162	2017/2184	1	Refused (24 May 2017)	Dismissed (23 January 2019)
163	2017/2189	1	Refused (28 December 2017)	Dismissed (19 September 2018)
164	2017/2198	1	Refused (23 January 2018)	Dismissed (18 October 2018)
165	2017/2229	8	Granted (02 February 2018)	
166	2017/2259	1	Refused (31 October 2017)	Dismissed (23 October 2018)
167	2017/2539	1	Granted (26 September 2018)	
168	2017/2572	9	Granted (22 August 2018)	
169	2017/2675	1	Refused (22 December 2017)	Dismissed (05 April 2019)
170	2018/13	7	Refused (18 May 2018)	
171	2018/47	3	Refused (03 April 2018)	Dismissed (03 May 2019)
172	2018/63	1	Granted (22 October 2018)	
173	2018/373	9	Refused (31 July 2018)	
174	2018/505	4	Refused (22 October 2018)	
175	2018/551	1	Refused (24 May 2018)	Dismissed (09 May 2019)
176	2018/586	3	Refused (14 May 2018)	Dismissed (09 May 2019)
177	2018/705	3	Granted (09 November 2018)	
178	2018/906	3	Refused (05 October 2018)	

179	2018/1004	6	Refused (20 July 2018)	Dismissed (15 May 2019)
180	2018/1067	1	Refused (06 August 2018)	
181	2018/1072	7	Granted (14 September 2018)	
182	2018/1085	1	Granted (14 August 2018)	
183	2018/1215	1	Refused (13 November 2018)	
184	2018/1218	1	Refused (25 September 2018)	
185	2018/1272	1	Granted (04 March 2019)	
186	2018/1327	1	Granted (10 October 2018)	
187	2018/1392	1	Granted (04 October 2018)	
188	2018/1430	5	Refused (27 February 2019)	
189	2018/1442	2	Refused (07 September 2018)	Dismissed (26 February 2019)
190	2018/1461	1	Refused (01 October 2018)	Dismissed (28 June 2019)
191	2018/1566	1	Granted (02 November 2018)	
192	2018/1622	1	Refused (06 December 2018)	
193	2018/1910	9	Refused (14 January 2019)	
194	2018/1984	3	Granted (01 April 2019)	
195	2018/2069	1	Granted (20 December 2018)	
196	2018/2098	1	Refused (28 January 2019)	
197	2018/2147	1	Refused (20 December 2018)	
198	2018/2153	7	Refused (07 January 2019)	
199	2018/2227	2	Granted (28 January 2019)	
200	2018/2264	6	Refused (29 January 2019)	
201	2018/2310	2	Granted (22 February 2019)	
202	2018/2333	1		Dismissed (13 June 2019)
203	2018/2400	1	Refused (30 January 2019)	
204	2018/2421	5	Refused (31 January 2019)	
205	2018/2447	1	Refused (25 July 2019)	

206	2018/2479	1	Refused (08 January 2019)	Dismissed (09 May 2019)
207	2018/2481	1	Granted (25 March 2019)	
208	2018/2562	5	Granted (28 February 2019)	
209	2018/2575	1	Granted (14 March 2019)	
210	2017/2581	2	Granted (13 December 2018)	
211	2019/68	9	Granted (28 June 2019)	
212	2019/138	3	Refused (19 March 2019)	
213	2019/140	1	Granted (17 July 2019)	
214	2019/200	2	Refused (27 March 2019)	
215	2019/237	9	Refused (03 April 2019)	
216	2019/312	1	Refused (15 April 2019)	
217	2019/321	1	Granted (09 May 2019)	
218	2019/336	1	Granted (30 April 2019)	
219	2019/502	3	Refused (16 May 2019)	
220	2019/566	1	Refused (31 May 2019)	
221	2019/610	4	Granted (24 May 2019)	
222	2019/736	1	Granted (16 July 2019)	