



Epsom and Ewell Green Belt

Technical note

For consultation 1 February 2023 to 19 March 2023

January 2023

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1 Introduction

Background

- 1.1 Epsom and Ewell Borough Council is in the process of preparing a new Local Plan for the period to 2040. Identifying the potential scale of, and locations for, new housing and other forms of development across the borough to meet identified needs is a priority issue for the Local Plan.
- 1.2 Whilst more than half of the land in the borough is urban, or previously developed, land, about 40% of it is covered by the Green Belt. The tightly drawn Green Belt boundaries around the borough's residential areas make the challenge of finding suitable sites and land all the more difficult.
- 1.3 A key requirement of the new Local Plan 2022-2040 is for it to be informed by a robust and up to date evidence base.

Purpose of this technical note

- 1.4 This Green Belt Technical Note has been prepared to support to Draft Local Plan 2022-2040 public consultation which runs from 1 February 2023 to 19 March 2023.
- 1.5 This note sets out the Green Belt evidence used to inform the Draft Local Plan to date and the methodology for future assessments of the Epsom and Ewell Green Belt designation intended to inform the next iteration of the Local Plan.
- 1.6 The proposed methodologies are open for comment alongside the Draft Local Plan and refined methodologies will be produced taking into account the comments received during the consultation period.
- 1.7 Once complete, these assessments will make up the final combined Green Belt Study, and will form an essential cornerstone in the provision of a sound and up to date evidence base to support the development of policies relating to the accommodation of future growth in the borough and will be used to inform decisions relating to the long-term growth aspirations for the borough.
- 1.8 This note also supports the Draft Local Plan 2022-2040 Spatial Strategy and the proposed release of Green Belt by setting out what Epsom and Ewell Borough Council considers to be the exceptional circumstances to justify Green Belt release.

Purpose of the combined study, once complete

- 1.9 This combined study has three principal purposes as follows:
 - to assess Epsom and Ewell's Green Belt against the five purposes of Green Belt as set out in the NPPF, with a view to potential release for development purposes in the longer term, should this be necessary within the new Epsom and Ewell Local Plan 2022-2040.
 - to assess the existing Green Belt boundary having regard to its intended permanence in the long term, so that it can endure beyond the plan period.
 - to identify defensible Green Belt boundaries for those sites identified as available through the Land Availability Assessment, with a view to potential release for development purposes in the longer term should this be necessary within the new Epsom and Ewell Local Plan 2022-2040.

Format and scope of the combined study, once complete

- 1.10 This combined study, once complete will include four assessments:
 1. An assessment of the extent to which land designated as Metropolitan Green Belt within the borough performs against the five purposes as set out in Paragraph 138 of the NPPF. Please note that this assessment is complete an attached as Appendix 1.
 2. An assessment of major previously developed land, currently within the Green Belt
 3. An assessment of any anomalies which may have arisen or come to the attention of the Council, over time, concerning the current alignment of the Green Belt boundary.
 4. An assessment of the potential for defensible Green Belt boundaries around strategic sites to accommodate growth.

2 Methodology

- 2.1 This section sets out the methodologies for the four assessments.

Assessment 1 - assessment of the extent to which land designated as Metropolitan Green Belt within the borough performs against the five purposes as set out in Paragraph 138 of the NPPF.

- 2.2 Epsom and Ewell Borough Council wish to understand the extent to which land designated as Metropolitan Green Belt within the borough performs against the five purposes as set out in the NPPF. The assessment will adopt a 'policy off' approach. Therefore, consideration of other constraints, policies, strategies or the development potential of any designated Metropolitan Green Belt land, has not been included within its scope. This approach is entirely consistent with the requirements of a strategic Green Belt study.
- 2.3 This assessment consists of three key stages as follows:
 - Stage 1: Defining discrete parcels.
 - Stage 2: Assessing the parcels against the 5 purposes of Green Belt as set out in the NPPF; and
 - Stage 2: Assessing Non- green belt land immediately adjoining the defined Metropolitan Green Belt boundary in the borough.

Stage 1

- 2.4 To identify discrete areas of Green Belt land and define them as individual parcels. These parcels will be delineated using strong permanent physical boundaries which are easily identifiable, in line with the requirements the NPPF for defining Green Belt boundaries. When defining boundaries, local planning authorities should...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 2.5 These features include:
- Roads (major roads and A-roads);
 - Rail and other permanent infrastructure.
 - Landscape Character Areas.
 - Watercourses.
 - Footpaths and bridleways.
 - Areas of woodland, hedgerows and treelines; and
 - Established field patterns.
- 2.6 The Metropolitan Green Belt land within the defined parcels does not necessarily respect authority boundaries. Areas of land immediately beyond the borough boundary are also designated Green Belt for example in the southwest of the borough where the Green Belt designation stretches beyond the authority boundary where it adjoins the administrative area of Mole Valley District Council. This study will consider the role of the Green Belt in its wider context and will, therefore, assess those parcels at the borough boundary taking account of the character of land beyond it.

Stage 2

- 2.7 This assessment will be carried out using a 'policy off' approach. Consideration will not, therefore, be given to the parcel's role in the context of any other constraints, policies, strategies or its development potential.
- 2.8 Each parcel will be subject to an assessment in line with the criteria set out below, and scoring will be informed by site visits to ensure robustness in the appraisal process. Each parcel will be assessed and assigned a score for the extent to which it performs against each purpose of Green Belt as set out in the NPPF:
- to check the unrestricted sprawl of large built-up areas.
 - to prevent neighbouring towns merging into one another.
 - to assist in safeguarding the countryside from encroachment; and
 - to preserve the setting and special character of historic towns.
- 2.9 By virtue of its designation, all Green Belt land is considered to make an equal contribution to the fifth purpose of Green Belt 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. Therefore, parcels will not be scored against this purpose.
- 2.10 Parcels will not be ranked against each other. Furthermore, each of the purposes of Green Belt carry equal weight and, therefore, parcels may perform poorly against one purpose and highly against others. This approach is wholly consistent with the requirements of a strategic Green Belt study.
- 2.11 For each of the first four purposes a score of 0, 1, 2 or 3 will be assigned, on the basis of the following:
- 0 – Parcel does not perform against the purpose
 - 1 – Parcel is lower performing against the purpose
 - 2 – Parcel is more moderately performing against the purpose
 - 3 – Parcel is higher performing against the purpose

Stage 3

- 2.12 Those areas of undesignated land immediately adjoining the defined Metropolitan Green Belt boundary in the borough, which may be considered as suitable for inclusion in the Green Belt, will be defined and assessed against the same criteria as designated Green Belt land.

Assessment 2 – assessment of major previously developed land, currently within the Green Belt

- 2.13 Epsom and Ewell Borough Council wish to consider whether major developed sites within the Green Belt should be inset (removed from the Green Belt).
- 2.14 The methodology for this consists of two main stages:
- Stage 1: Does the major previously developed site possess open character, justifying its retention within the Green Belt, and resistance of notable future redevelopment or expansion?
 - Stage 2: If the site does not contribute to the openness of the wider Green Belt does the major previously developed site exhibit defensible boundaries that would allow for inseting in accordance with the NPPF.

Stage 1 - Does the major previously developed site possess open character, justifying its retention within the Green Belt, and resistance of notable future redevelopment or expansion?

- 2.15 Paragraph 143 of the NPPF advises that when defining Green Belt boundaries, local authorities should not include land which it is unnecessary to keep permanently open, and if the major previously developed sites are of sufficient scale and do not possess an open character, it may not be necessary, or even possible, to keep them permanently open.
- 2.16 Paragraph 144 of the NPPF refers to villages within the Green Belt only being included within the Green Belt if the open character of the village makes an important contribution to the openness of the Green Belt. Whilst recognising that the major developed sites are not villages, it is considered reasonable to adopt a similar approach towards their potential for inclusion or inseting within the Green Belt.
- 2.17 If the major previously developed sites contribute little to the openness of the Green Belt at present, then it is unlikely to be necessary to keep the site within the Green Belt, and inseting would be justified and necessary in accordance with the NPPF.
- 2.18 The inseting of the major previously developed sites within the Green Belt would result in less policy restraint towards their growth and redevelopment proposals, albeit there would still be a need to adhere to other relevant planning policies and guidance controlling the development of such sites away from the urban areas.
- 2.19 If a major previously developed site is not considered appropriate for inseting and should remain 'washed over' within the Green Belt it would imply that the open character of the site makes an important contribution to the openness of the Green Belt. This would in turn imply that there is limited opportunity to redevelop, or expand the site, without detracting from the openness of the Green Belt. Redevelopment proposals would therefore need to be assessed in the light of paragraph 149 (last bullet point) of the NPPF, which allows such redevelopment, subject to it not having a greater impact on the openness of the Green Belt, and the purposes of including land within it, than the existing development.
- 2.20 In order to assess whether the major previously developed sites should be inset from the Green Belt, the proportion of the site that has been built upon will be calculated to help inform whether the site displays an open character. A potential Green Belt inseting boundary would be indicated if the site does not generally display open character that contributes to the wider Green Belt. This potential Green Belt inseting boundary would not necessarily follow the curtilage of buildings or development footprint within the site as these would need to conform with the Green Belt boundary principles and the formation of permanent defensible boundaries, as explained within the NPPF. The resulting appropriate boundary may therefore allow for the expansion or redevelopment within the site up to the identified inseting boundary.
- 2.21 In addition to calculating the percentage of built coverage or development footprint of the site, consideration will also be given to its appearance and the site area when assessing the presence or absence of open character. There are inevitably developments, including farm buildings that offer a notable element of development within the Green Belt but do not justify removal from it. As a result, sites will need to be of sufficient scale to justify being inset from the Green Belt. Such calculations are not conclusive with regards to the presence or absence of open character at each of the major previously developed sites, however, these provide an indication of openness supported by observations from site surveys.

Stage 2 Does the major previously developed site exhibit defensible boundaries that would allow for inseting in accordance with the NPPF.

- 2.22 A potential Green Belt inseting boundary would be indicated for the major previously developed site if the principles of paragraph 143 of the NPPF could be accommodated, in particular the need to follow physical features that are recognisable and likely to be permanent.

Assessment 3 - An assessment of any anomalies which may have arisen or come to the attention of the Council, over time, concerning the current alignment of the Green Belt boundary.

- 2.23 Epsom and Ewell Borough Council wish to consider whether any minor Green Belt boundary changes are required to correct any anomalies in the current definition of the Green Belt boundary and ensure that it accords with guidance in the NPPF. Over time, some anomalies have arisen or come to the attention of the Council concerning the current alignment of the Green Belt boundary. These have arisen because there have been changes in circumstances on the ground since the current Green Belt boundary was defined and/or because advice on how the Green Belt boundary should be defined has been updated.
- 2.24 The new Local Plan 2022-2040 presents an opportunity to ensure that the Green Belt boundary is up to date and follows consistent criteria throughout the borough. This is a separate process from the identification of sites for development.
- 2.25 When defining Green Belt boundaries, the NPPF (paragraph 139) states that local planning authorities should, among other things “Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”. Account should also be taken of the extent to which it is necessary to keep land permanently open.
- 2.26 The methodology for this consists of a single stage:
- Stage 1: Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?

Assessment 4 - An assessment of the potential for defensible Green Belt boundaries around strategic sites to accommodate growth.

- 2.27 Epsom and Ewell Borough Council wish to consider whether there can be defensible green belt boundaries identified for the available sites identified in the Land Availability Assessment, should these be identified for future growth in the new Local Plan 2022-2040.
- 2.28 The methodology for this consists of a single stage.
- Stage 1: Does the site exhibit defensible boundaries that would allow for inseting in accordance with the NPPF.
- 2.29 A potential Green Belt inseting boundary would be indicated for the site if the principles of paragraph 143 of the NPPF could be accommodated, in particular the need to follow physical features that are recognisable and likely to be permanent.

3 Assessment 1 – Strategic Green Belt Review

Epsom and Ewell Green Belt Study (2017)

- 3.1 This assessment was completed in 2017 and whilst the Introduction chapter is now out of date, the methodology and findings of the report have been reviewed to ensure that they remain fit for purpose and robust to support the new Local Plan 2022-2040. Over the course of the past 5 years, little has changed to affect the scoring contained within this study. The findings therefore remain robust and can be relied upon.
- 3.2 The findings of this assessment are detailed in Appendix 1.

4 Exceptional circumstances

Introduction

- 4.1 In addressing the matter of amendments to Green Belt boundaries, the National Planning Policy Framework (NPPF) at Para. 140 states that these should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.
- 4.2 The exceptional circumstances test is a less demanding one than that for very special circumstances, when seeking to determine a planning application for inappropriate development in the Green Belt. This was confirmed in the case of *Compton PC v Guildford BC* (2019), which also determined that exceptional circumstances is a matter of planning judgement, which can also include meeting the need for housing.
- 4.3 The NPPF further states at Para. 141 that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the plan-making authority are required to demonstrate that all other reasonable means for meeting needs have been considered.

Assessment of Exception Circumstances

Starting point

- 4.4 The NPPF at Para. 141, states that the justification for releasing Green Belt to meet development need will be assessed through the examination of the authority's strategic policies and whether the strategy:
- a) makes as much use as possible of suitable brownfield sites and underutilised land**
- 4.5 Epsom and Ewell Borough Council has investigated all opportunities to develop brownfield land. The Land Availability Assessment (LAA) draws upon a variety of sources and includes sites put forward under the Call for Sites exercise, schemes with planning permission or in the planning process (including at pre-application stage), officer review of additional sites through desk-based assessments and site visits, and the Council's own land holdings. Based on the evidence to date the Council considers that there are no further opportunities to meet housing need in full on brownfield sites alone.

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

- 4.6 Densities have been optimised as far as possible in quantifying potential yields on LAA sites without having a significant negative impact on the character of the area. The Council considers that there are no further opportunities to optimise densities, to meet housing need in full.

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

- 4.7 The Council has engaged with its neighbouring authorities to ask whether they have capacity to meet any potential unmet need. Discussions on this matter are included within the Duty to Cooperate Framework and no authorities were able to assist. Although some were at different stages of plan-making, all were experiencing similar challenges to Epsom and Ewell Borough Council in terms of meeting their own development needs, given the high figure generated by the standard methodology and their constraints, so had no spare capacity to meet additional need in the wider area. In light of the above, Epsom and Ewell Borough Council is considered justified in amending Green Belt boundaries to help meet need.
- 4.8 The professional view of officers is that we have exceptional circumstances to warrant amending Green Belt boundaries to help meet our needs. In reaching this position, officers have balanced the harm caused by the principle of Green Belt release and the impact on individual sites against the benefits of those sites being developed and to the strategy as a whole. The key point is that the release at just 3.6% of the boroughs Green Belt is very limited and therefore the benefits clearly outweigh the degree of harm. The same position would be unlikely in the event of a much larger release. As such, the Council is focused on releasing land for specific purposes. These are: family homes, a greater proportion of affordable housing (40% on green field compared with 30% on brownfield), and the provision of Gypsy and Traveller accommodation.
- 4.9 The overall rationale for the selection of sites has been those that result in the least harm for the most benefit. Without the Green Belt sites, the Local Plan would largely deliver the status quo in terms of housing delivery, with only allocated sites in the urban area that can achieve planning permission regardless of whether we have an up-to-date Local Plan in place.
- 4.10 This Technical Note sets out below the basis for exceptional circumstances, proportionate to the stage of plan-making (Regulation 18). These are:
- A historic under delivery of housing as shown in the Authority Monitoring report.
 - A historic under delivery of affordable housing as shown in the Authority Monitoring report.
 - A lack of five-year housing land supply.
 - A failure of the Housing Delivery test.
 - The increasing levels of homelessness.
 - That there were 1200 households on the housing needs register, over 600 of these households were identified as being in high housing need (June 2022).
- 4.11 Green Belt release sites provide the opportunity to:
- deliver a greater mix of homes including the provision of family housing, which would not be feasible on previously developed urban sites. Urban sites are largely expected to prioritise the delivery of housing through flatted development schemes in order to maximise the efficient use of land and boost densities. Greenfield sites however are not subject to the same constraints and viability issues and therefore offer somewhat of a 'blank canvas' to increase the provision of dwellings.
 - deliver a higher proportion of affordable housing. Due to their less complex viability considerations, greenfield sites i.e. those in the Green Belt, have been viability tested to a level of 40% Affordable Housing. This level will help to substantially increase the level of Affordable Housing provision within the borough. In comparison, viability testing on previously developed urban site typologies has shown that only a 30% Affordable Housing level is likely to be viable.
 - delivery Gypsy and Traveller Accommodation. Due to the constrained nature of the borough, it has not been possible to identify any sites within the urban area or any brownfield sites on which to accommodate additional pitches.
- 4.12 In conclusion, we consider the sites identified in our Draft Local Plan for release from the Green Belt are pivotal to the delivery of our strategy and that the substantial benefits outweigh the harm resulting from amending Green Belt boundaries and any other harm.

5 Appendix 1 – Epsom and Ewell Green Belt Study (2017)

Epsom and Ewell Green Belt Study

Assessment Report

Epsom and Ewell Borough Council

February 2017





1. Introduction

- 1.1 Atkins Limited was commissioned by Epsom and Ewell Borough Council (EEBC) to carry out a Green Belt Study to assess the performance of land designated as Metropolitan Green Belt in Epsom and Ewell as part of the evidence base for the partial review of 'The Core Strategy 2007' (hereafter referred to as the Core Strategy), which forms part of the adopted Epsom and Ewell Local Plan. This Green Belt Study will be used to inform decisions relating to the long-term growth aspirations for the borough and discussions with neighbouring authorities under the Duty to Co-operate relating to the accommodation of wider growth pressures from both within and beyond Surrey.

Requirement for the Study

- 1.2 The key driver for this Green Belt Study (hereafter referred to as the Study) is EEBC's need to adopt a partial review of its Core Strategy taking account of the requirements of the National Planning Policy Framework (NPPF) and up to date Planning Practice Guidance (PPG).
- 1.3 A key requirement of the Core Strategy partial review is for it to be informed by a robust and updated evidence base. Part of this evidence base includes the Strategic Housing Market Assessment for Epsom and Ewell and the adjoining authorities of the Royal Borough of Kingston upon Thames, Elmbridge Borough Council and Mole Valley District Council. Increasing development pressure from both within and beyond the borough boundary means that EEBC, and its adjoining authorities, must engage in ongoing work under the Duty to Co-operate to ensure the adequate provision of land for housing.
- 1.4 Part of EEBC's ongoing commitment to fulfilling the requirement of the Duty to Co-operate and ensuring the adequate consideration of wider growth pressures has been the signing of the Surrey Local Strategic Statement (Surrey LSS) within which EEBC made a commitment to undertake an assessment of the Metropolitan Green Belt within its boundaries.
- 1.5 This Study will form an essential cornerstone in the provision of a sound and up to date evidence base to support the development of policies relating to the accommodation of future growth in the borough. Furthermore, the Study will perform a wider role in informing the Surrey LSS by providing an up to date view of how the Metropolitan Green Belt within EEBC is performing, whilst also contributing to the aim of achieving a comprehensive review of the Metropolitan Green Belt as a whole.

Scope

- 1.6 The core purpose of this Study is to assess the extent to which land designated as Metropolitan Green Belt within the borough performs against the five purposes as set out in Paragraphs 79 and 80 of the NPPF.

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

80. Green Belt serves five purposes

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

The scope and basis of this Study is set out in the table below and has been carried out adopting a 'policy off' approach. Therefore, consideration of other constraints, policies, strategies or the development potential of any designated Metropolitan Green Belt land to which the Study relates, has not been included within its scope. This approach is entirely consistent with the requirements of a strategic Green Belt study at this stage of the Core Strategy partial review process. Once complete, this Study will provide a platform for EEBC to make decisions relating to the accommodation of future growth in the borough.

This Study:	This Study DOES NOT:
<ul style="list-style-type: none"> Assesses the extent to which land designated as Metropolitan Green Belt in Epsom and Ewell performs against the five purposes of Green Belt as set out in Paragraph 80 of the NPPF; Provides up to date evidence in relation to how the Metropolitan Green Belt within the borough is performing; and Assesses discrete parcels of land immediately beyond the currently adopted Metropolitan Green Belt boundary which may be suitable for inclusion with the Green Belt. 	<ul style="list-style-type: none"> Assess the development potential of land designated as Metropolitan Green Belt; Make recommendations as to the extent or basis of further and more detailed assessments; Make recommendations for amendments to the existing Metropolitan Green Belt boundary; Determine whether or not land should be removed from the Metropolitan Green Belt; Consider the role of Metropolitan Green Belt land in wider strategies, policies or programmes; Take account of other constraints such as flood risk or other statutory designations; or Consider the land's performance in the context of other land-use policies.

Approach

- 1.7. This Study has been undertaken in seven key stages:
- Stage One: Establishing the scope of the Assessment;
 - Stage Two: Establishing the methodology;
 - Stage Three: Identification of assessment parcels;
 - Stage Four: Detailed assessment of parcels;
 - Stage Five: Scoring and draft reporting;
 - Stage Six: Stakeholder workshop; and
 - Stage Seven: Final reporting.
- 1.8. Stage One of the Study process included a review of background information which provided the opportunity to establish the scope of the Study and to understand the local context within which it was to be undertaken. The assessment methodology assessment was drafted and consulted upon before being finalised at Stage Two. This consultation was carried out with neighbouring authorities, with the aim of reflecting a cohesive approach to the assessment of Metropolitan Green Belt, whilst demonstrating EEBC's commitment to the Surrey LSS and the wider Duty to Co-operate. A list of stakeholders who were consulted at this stage is included in Appendix F. The Metropolitan Green Belt land within EEBC was divided into discrete parcels at Stage Three, taking account of the Green Belt land adjoining or straddling the borough boundary. These discrete parcels were subject to detailed assessment at Stage Four in line with the finalised methodology, with the findings informing the scoring and draft reporting at Stage Five. A key stakeholder workshop was held at Stage Six in December 2016 to discuss the initial findings of the assessment before the final

draft report was prepared at Stage Seven. A list of the stakeholders who attended the workshop in December 2016 is included in Appendix F.

Structure of the Assessment Report

- 1.9. This report outlines the findings of the assessment undertaken as part of the Study, and is divided into five sections. Following this introduction (Section 1), a detailed description of the strategic and planning context to the Metropolitan Green Belt within Epsom and Ewell is provided in Section 2. Section 3 outlines the methodology used, whilst Section 4 sets out the detailed assessment findings. Section 5 provides a summary of overall performance of the Metropolitan Green Belt in Epsom and Ewell. Detailed maps relating to the assessment of the individual land parcels are included within the Appendices at the back of this Report.

Study Context

- 1.10. A review of available relevant background information relating to Epsom and Ewell was undertaken in order to establish the local context for the Study and to inform the assessment of the discrete parcels. This review helped to inform the preparation of an objective and locally sensitive methodology which supports a robust and thorough assessment of how land designated as Metropolitan Green Belt within EEBC performs.

Local Context

- 1.11. Epsom and Ewell is a borough authority located within the north east of the county of Surrey, adjacent to the London Borough of Sutton (to the north east) and the Royal Borough of Kingston upon

Thames (to the north west). The administrative area of Reigate and Banstead Borough Council adjoins EEBC to the south east, with the boundary of Mole Valley District Council adjoining to the south west.

- 1.12. A large proportion of the borough is designated as Green Belt (42%) land forming part of the much wider Metropolitan Green Belt. The Metropolitan Green Belt within EEBC forms a horseshoe shape wrapping around the central urban areas in the centre and north of the borough. The Metropolitan Green Belt stretches beyond the borough boundary, merging with Green Belt land within the Royal Borough of Kingston upon Thames to the west, Mole Valley District Council to the south west, Reigate and Banstead Borough Council to the south east and a smaller area of Green Belt land in the London Borough of Sutton to the east.
- 1.13. The character of EEBC varies greatly with more urbanised areas to the north and within the centre of the borough and rural areas characterising the south. Within the Green Belt there are varying and diverse land uses, with the most significant being publicly accessible open space which accounts for approximately 40% of designated Green Belt land in the borough. This open space includes Epsom Downs (including Epsom Downs Racecourse and associated facilities), Horton Country Park and Epsom Common. Leisure use is also a predominant feature within the Green Belt in EEBC with Cuddington Golf Course, RAC Woodcote Park Country Golf Club, Epsom Golf Club and Horton Park Golf Club all within designated Green Belt land. Alongside areas of open space there are numerous developed sites within the Green Belt, including a number of former hospital sites (known as the hospital cluster) in the north west portion of the borough. These sites have been the focus of redevelopment for residential uses much of which is now complete. The North East Surrey College of Technology (NESCOT) and Epsom College are also within the Green Belt in the eastern portion of the borough and are designated as Major Developed Sites under Policy DM2 'Infilling within the Major Developed Sites' of the Epsom and Ewell Development Management Policies Document (2015).

reviewed. The components which will be included in the partial review of the Core Strategy are a review of the borough's housing targets, affordable housing policy, housing supply strategy, policy approach to the provision of Gypsy and Traveller accommodation and designated Green Belt land, alongside the provision of new policies relating to the borough's heritage assets.

- 1.15. To date, no strategic review of the Metropolitan Green Belt within Epsom and Ewell carried has been out. However, the Epsom and Ewell Green Infrastructure Study (2013) provided a detailed overview of the Metropolitan Green Belt, the need for safeguarding and its role in the distinctive and varied character of the borough.
- 1.16. This Study will form part of the updated evidence base supporting the formulation of strategic policies which consider EEBC's role in accommodating future growth, alongside wider strategic focusses for development beyond the borough's boundary.

The Epsom and Ewell Local Plan

- 1.14. EEBC's proximity to Greater London, and its position within the South East region, places increasing pressure on Epsom and Ewell to accommodate future long-term growth. Within this context, the current Core Strategy, which forms part of the adopted Epsom and Ewell Local Plan, will be partially



2. Study Approach

- 2.1. In order to ensure a robust approach to the Study, this methodology has been informed by the key relevant requirements of the NPPF.
- 2.2. An initial Draft Methodology was issued for consultation to key stakeholders and neighbouring authorities in October 2016 as set out in the list of consultees in Appendix F. The feedback received was taken into consideration and is reflected in the methodology which has formed the basis of this Study.

Defining Discrete Parcels

- 2.3. As a starting point, the Study identified discrete areas of Green Belt land and defined them as individual parcels. These parcels were delineated using strong permanent physical boundaries which are easily identifiable, in line with the requirements of Paragraph 85 of the NPPF for defining Green Belt boundaries:

85. When defining boundaries, local planning authorities should...define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

- 2.4. These features included:
 - Roads (major roads and A-roads);
 - Rail and other permanent infrastructure;
 - Landscape Character Areas;
 - Watercourses;
 - Footpaths and bridleways;
 - Areas of woodland, hedgerows and treelines; and
 - Established field patterns.
- 2.5. The Metropolitan Green Belt land within the defined parcels does not necessarily respect authority boundaries. Areas of land immediately beyond the borough boundary are also designated Green Belt for example in the south west of the borough where the Green Belt designation stretches beyond the authority boundary where it adjoins the administrative area of Mole Valley District Council. This Study has considered the role of the Green Belt in its wider context and has, therefore, assessed those parcels at the borough boundary taking account of the character of land beyond it.

Assessment Methodology

- 2.6. As set out in Section 1, this Study has been carried out using a 'policy off' approach. Consideration has not, therefore, been given to the parcel's role in the context of any other constraints, policies, strategies or its development potential.
- 2.7. Each parcel has been subject to an assessment in line with the criteria set out in Table 1 below, and scoring has been informed by site visits to ensure robustness in the appraisal process. Each parcel has been assessed and assigned a score for the extent to which it performs against each purpose of Green Belt as set out in Paragraph 80 of the NPPF:
 - *to check the unrestricted sprawl of large built-up areas;*
 - *to prevent neighbouring towns merging into one another;*
 - *to assist in safeguarding the countryside from encroachment; and*
 - *to preserve the setting and special character of historic towns.*
- 2.8. By virtue of its designation, all Green Belt land is considered to make an equal contribution to the fifth purpose of Green Belt '*to assist in urban regeneration, by encouraging the recycling of derelict and other urban land*'. Therefore, parcels have not been scored against this purpose.
- 2.9. Parcels have not been ranked against each other. Furthermore, each of the purposes of Green Belt carry equal weight and, therefore, parcels may perform poorly against one purpose and highly against others. This approach is wholly consistent with the requirements of a strategic Green Belt Study which will form a robust and transparent part of the evidence base to inform the partial review of the Core Strategy as part of Epsom and Ewell's Local Plan.

Non-Green Belt Land

- 2.10. Those areas of undesignated land immediately adjoining the defined Metropolitan Green Belt boundary in EEBC, which may be considered as suitable for inclusion in the Green Belt, have been defined and assessed against the same criteria as designated Green Belt land. These are addressed in more detail in Section 3.

Assessment Criteria

2.11. The assessment of each Parcel was carried out against the following criteria and scoring system. For each of the first four purposes a score of 0, 1, 2 or 3 was assigned, on the basis of the following:

- 0** – Parcel does not perform against the purpose
- 1** – Parcel is lower performing against the purpose
- 2** – Parcel is more moderately performing against the purpose
- 3** – Parcel is higher performing against the purpose.

Table 1 - Assessment Criteria

Green Belt Purpose	Parcel Criteria and Scoring	Assessment Considerations
1. To check unrestricted sprawl of large built-up areas	<p>Is ribbon or other development present within the Parcel?</p> <p>Is other development detached from the existing built-up area?</p> <p>Scoring</p> <p>Parcel is already developed and/or is within the urban area with no clear boundary =</p> <p>0 Parcel does not perform against the purpose</p> <p>Ribbon/other development is already present and/or other development is detached from the existing built-up area with no clear boundary =</p> <p>1 Parcel is lower performing</p> <p>Parcel boundary is weak but can be identified and there is no development present =</p> <p>2 Parcel is more moderately performing</p> <p>Parcel boundary is clearly identifiable/durable and there is no development present =</p> <p>3 Parcel is higher performing</p>	<p>Consideration should be given to how well contained the urban area is by the Parcel, i.e. what role does it play in restricting the spread of urbanising development. Ribbon development is an indication that the Green Belt is not performing.</p> <p>Durable boundaries are considered to be roads and other infrastructure, permanent natural features such as watercourses, flood plains, protected woodland, etc. Less durable boundaries are considered to be field boundaries, hedgerows and treelines. Whilst easily identifiable, these features are less durable.</p>
2. To prevent neighbouring towns merging into one another	<p>Does the Parcel represent a 'gap' between urban areas?</p> <p>Is the Parcel within an existing urban area?</p> <p>Scoring</p> <p>Parcel is within an existing urban area and does not represent a gap between neighbouring urban areas =</p> <p>0 Parcel does not perform against the purpose</p> <p>Parcel represents a gap of more than 5 kilometres between urban areas =</p> <p>1 Parcel is lower performing</p> <p>Parcel represents a gap of between 1 and 5 kilometres between urban areas and is not within an existing urban area =</p> <p>2 Parcel is more moderately performing</p> <p>Parcel represents a gap of less than 1 kilometres between urban areas and is not within an existing urban area =</p> <p>3 Parcel is higher performing</p>	<p>Merging can reasonably be expected if a gap of less than 1 kilometre is identified. Parcels representing gaps of less than 1 kilometre play an essential role in preventing the merging of urban areas.</p>

Green Belt Purpose	Parcel Criteria and Scoring	Assessment Considerations
3. To assist in safeguarding the countryside from encroachment	<p>Is the Parcel characterised by countryside?</p> <p>Does the Parcel adjoin areas of countryside?</p> <p>Is ribbon or other development present within the Parcel?</p> <p>Scoring</p> <p>Parcel is not characterised by countryside, does not adjoin countryside and/or has been developed = 0 Parcel does not perform against the purpose</p> <p>Parcel is adjoined by countryside and has development present = 1 Parcel is lower performing</p> <p>Parcel is generally characterised by countryside, is adjoined by countryside and/or has limited development present = 2 Parcel is more moderately performing</p> <p>Parcel is characterised by countryside, adjoins countryside and does not contain any development = 3 Parcel is higher performing</p>	<p>Countryside is considered to be land which is rural and open including farmland. Associated agricultural buildings are not considered to be development for the purposes of assessing the encroachment of urban development.</p> <p>Development at Epsom Downs Racecourse which is directly related to the racecourse is not considered to be urbanising development in line with the approach to the assessment of planning applications for such development, permitted development rights and the NPPF. The same approach will be taken to equestrian related development which is detached from the Racecourse.</p>
4. Preserve the setting and special character of historic towns	<p>Is the Parcel within or adjoining a Conservation Area within an historic town?</p> <p>Are key landmarks or the historic core visible from within the Parcel?</p> <p>Does the Parcel contribute to the setting of an historic town?</p> <p>Scoring</p> <p>Parcel is not within, adjacent to or part of the setting of a Conservation Area within a historic town = 0 Parcel does not perform against the purpose</p> <p>Parcel is adjacent to or is part of the setting of a Conservation Area within a historic town but has no views of landmarks and/or the historic core = 1 Parcel is lower performing</p>	<p>An assessment of topography, intervening features and site visits would be used to assess the performance of the relevant Parcels against this purpose. Consideration should be given to views into and of Conservation Areas and any historic landmarks/ key historic buildings. This should include the considerations of views and setting of Greater London.</p>
5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land	<p>By virtue of its designation all designated Green Belt land is considered to make an equal contribution to the fifth purpose of Green Belt. Therefore parcels have not been assessed against this purpose.</p>	



3. Study Findings

- 3.1. The following section details the findings of the Study, which reviewed and scored a total of 53 discrete parcels of designated Metropolitan Green Belt land against the criteria set out in Table 1 above. A total of 4 parcels of non-designated land were also reviewed against the same criteria to assess how they would perform if designated as Green Belt land.
- 3.2. Table 2 provides parcel scoring and should be read alongside Appendix A 'Assessment Areas' which illustrates the discrete parcels, whilst maps in Appendices B - E provide graphical representations of scoring against each of the first four purposes of Green Belt.

Designated Green Belt Land

- 3.3. Each Parcel has been assessed to understand its relevant contribution to the Metropolitan Green Belt. Table 2 provides scoring against each of the first four purposes alongside a total combined score. The parcels have not been ranked and the inclusion of a total score is for illustrative purposes only, rather than to provide a comparator between the parcels.



Parcel P09 Land between Chalk Lane and Ashley Road

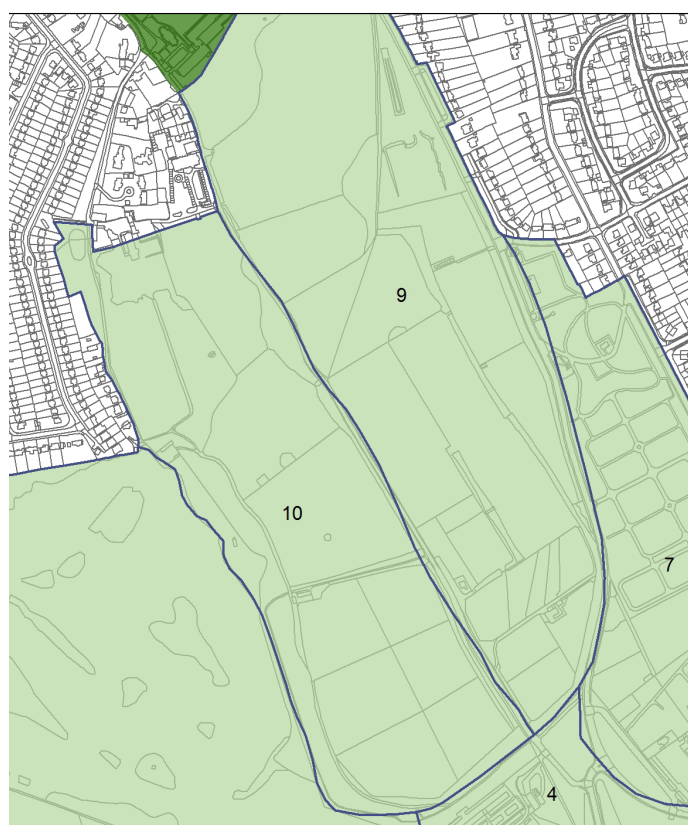


Figure 1

Purpose 1

- 3.4. Parcels which perform highly against purpose 1 to 'Check unrestricted sprawl of large built-up areas' are those parcels which directly adjoin the edge of the urban area within EEBC. Those parcels with strong defensible permanent boundaries at the urban edge are particularly strong. The majority of parcels in the south west portion of the borough perform highly against purpose 1. These parcels include P09 and P10 where the Green Belt forms a peninsular into the urban area of Epsom at its southern edge. These parcels have strong defensible boundaries formed of well-established hedgerows and groups of trees. The B290 Ashley Road forms the eastern boundary of parcel P09 (Figure 1) adding to its robustness in terms of purpose 1.
- 3.5. Parcels which perform more moderately against purpose 1 include parcels which are immediately adjacent to the built up area of EEBC but where boundaries are less permanent and defensible. These parcels include those where the urban facing boundaries are formed of residential gardens. Whilst these boundaries are identifiable they are less

permanent and defensible, for example parcel P37. The eastern and western boundaries of P37 are formed of the residential gardens of properties on Reigate Road to the east and Longdown Lane North to the west. The parcel's southern boundary is more robust and is formed of the A2022 College Road. Whilst this parcel contains Epsom Skip Hire Company, the area of development is limited and is not considered to be urbanising, therefore, is not deemed to be urban sprawl or ribbon development.

- 3.6. Parcels which are lower performing against purpose 1 include parcels which are within the north west portion of the Green Belt. The boundaries of most of these parcels are weak and not easily identifiable where they meet the urban area. Furthermore, there is urbanising development in these parcels, with some heavily developed with residential units. Parcels which contain the redeveloped hospital sites do not perform against this purpose as they contain urbanising development and do not have clear defensible boundaries. For example, Parcel P30 (Figure 2) directly adjoins the built up area of Epsom and contains urbanising development at St Ebba's former hospital site. There is no clear boundary between the urban area and the Green Belt in this area.

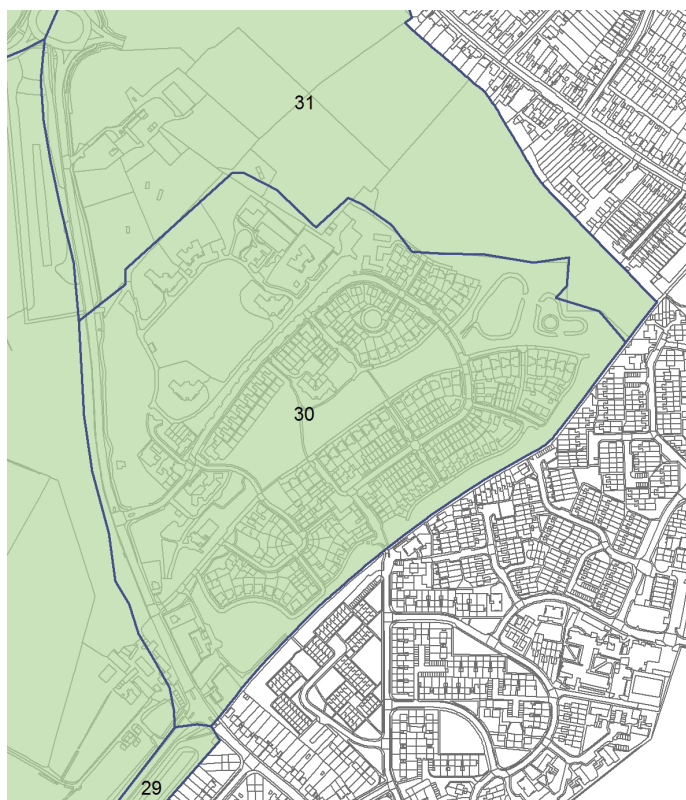


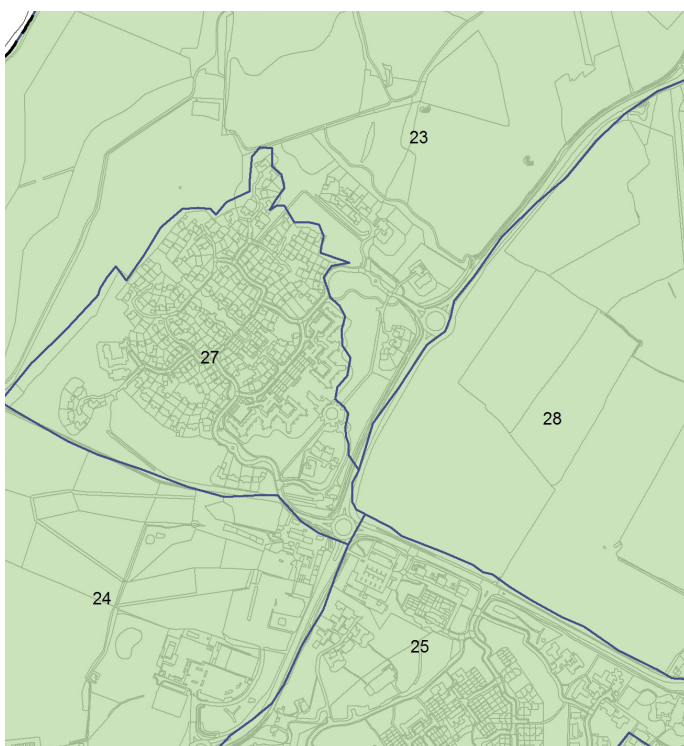
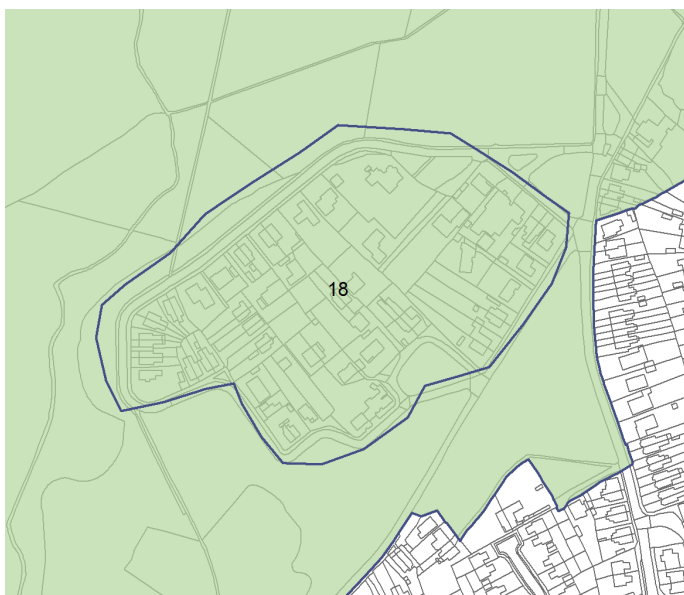
Figure 2 Parcel P30 Land at St Ebba's former hospital site

Purpose 2

- 3.7. Parcels which perform highly against purpose 2 to 'Prevent neighbouring towns merging into one another' are those parcels which form a gap of less than 1 kilometre between urban areas. Within the south east of the borough parcel P06, alongside parcels P08 and P32 - P34 form a gap of approximately 1 kilometre between the southern edge of the urban area of Epsom and Great Burgh to the south east. Parcels P47, P49 and P50, alongside Green Belt immediately beyond the borough's boundary, play a pivotal role in preventing the merging of Belmont to the east and East Ewell to the west. Whilst these areas are adjoining in the area to the north of these parcels, the presence of Green Belt prevents further coalescence.
- 3.8. In the west of the borough, parcels P13 and P14 form a gap of approximately 500 metres between the Woodcote area of EEBC to the east and the eastern edge of Ashted to the west. Parcel P14 is formed of the southern part of Epsom Common whilst P13 is formed of fields, both of which play a crucial role in preventing the coalescence of Epsom and Ashted.
- 3.9. Parcels which are more moderately performing against purpose 2 include those which form a gap of between 1 and 5 kilometres between urban areas. Parcels P04, P09, P10 and P11 together form a gap of approximately 1.3 kilometres between the Woodcote/Chalk Lane area of Epsom to the north and Langley Vale to the south.

3.10. Lower performing parcels include those areas of Green Belt land to the extreme south of the borough, beyond Langley Vale. Parcels P01 and P03, alongside Green Belt beyond the borough boundary, form a gap of more than 5 kilometres between Langley Vale to the north and smaller settlements of Headley to the south beyond the M25 motorway.

3.11. Parcels P30 and P18 do not perform against purpose 2 as both parcels are an extension of the existing urban area and, therefore, do not form a gap.



Purpose 3

3.12. Parcels which perform highly against purpose 3 to '*Assist in safeguarding the countryside from encroachment*' are generally those contained areas of Green Belt land which adjoin more rural areas away from the main built-up areas of the borough. Parcels P01 at the southern edge of the borough and the larger parcels P17 and P23 along the western boundary perform highly against this purpose.

3.13. Parcels which are more moderately performing are largely those which immediately adjoin the built up areas of EEBC or adjoining boroughs, including parcels P03, P04, and P28. Although adjacent to urban areas, these parcels are mainly characterised by countryside and do not contain development.

3.14. Lower performing parcels include those areas of the Green Belt which are enclosed by the urban areas or which contain ribbon development. These parcels include P37 and P35 where ribbon development runs along Reigate Road and Longdown Lane South respectively.

Purpose 4

3.15. Parcels which perform highly against purpose 4 to '*Preserve the setting and special character of historic towns*' are those areas of the Green Belt which adjoin Conservation Areas. Parcels P09 and P10 provide clear views of, and extend in to, the Chalk Lane Conservation Area, protecting its setting by restricting development in this location. There are clear views of the historic Durdan's Estate from within P10 and, therefore, this parcel is pivotal in preserving the views of this historic landmark within the Conservation Area.

3.16. Parcels which are more moderately performing against purpose 4 include those that surround the hospital clusters in the north west of the borough. Parcels P23, P24 and P28 adjoin and have limited views of The Manor, West Park, Horton and Long Grove Conservation Areas and therefore contribute to their preservation.

3.17. Parcels which are lower performing against Purpose 4 include Parcels P40 – P42 along the eastern edge of Reigate Road, south of the railway line. These parcels benefit from limited views of the Higher Green and Ewell Downs Road Conservation Areas which are set back from the western edge of Reigate Road by a single row of dwellings.

Table 2 - Designated Green Belt Scoring

Parcel ID	Description	Purpose 1 Score	Purpose 2 score	Purpose 3 score	Purpose 4 score	Overall score
P01	Land to the south east of Langley Vale Road	3	1	3	0	7
P02	Land to the south west of RAC Woodcote Park Country Club	2	2	2	0	6
P03	Land to the south west of Langley Vale	2	1	2	0	5
P04	Land at Epsom Downs Racecourse	3	2	2	0	7
P05	Land to the east of Langley Vale	3	2	2	0	7
P06	Land at Epsom Golf Course	2	2	3	0	7
P07	Land between Downs Road and Ashley Road	3	2	2	0	7
P08	Land to the east of Downs Road	3	2	3	0	8
P09	Land between Chalk Lane and Ashley Road	3	2	3	3	11
P10	Land immediately west of Chalk Lane	3	2	3	3	11
P11	Land at RAC Woodcote Park Country Club	3	2	2	1	8
P12	Land to the west of Headley Road	2	3	1	0	6
P13	Land to the east of The Rye	3	3	3	0	9
P14	Land to the south of Dorking Road	3	3	3	0	9
P15	Land to the north of Dorking Road west of Wells Road	3	3	3	0	9
P16	Land to the north of Dorking Road east of Wells Road	3	3	3	0	9
P17	Land at Epsom Common	3	3	3	3	12
P18	Land at Bracken Path and Church Side	0	0	1	3	4
P19	Land to the north of Christ Church Road	1	0	2	3	6
P20	Land at and immediately surrounding West Park former hospital site	1	0	1	3	5
P21	Land to the east of West Park former hospital site	3	3	2	3	11
P22	Land at and immediately surrounding Horton former hospital site	0	0	1	3	4
P23	Land at Horton Country Park and Horton Park Golf Club	3	3	3	2	11
P24	Land to the west of Horton Lane north of Epsom Polo Club	3	2	2	2	9
P25	Land at The Manor former hospital site	0	0	1	3	4
P26	Land at Long Grove Park	2	3	2	0	7
P27	Land at Clarendon Park (Long Grove former hospital site)	0	0	1	3	4
P28	Land to the north of Chantilly Way east of Horton Lane	3	3	2	2	10
P29	Land to the east of Chantilly Way	2	0	0	0	2
P30	Land at St Ebba's former hospital site	0	0	1	3	4
P31	Land to the north west of St Ebba's former hospital site	2	3	2	2	9
P32	Land to the west of Burgh Heath Road east of Rifle Butts Alley	3	2	2	0	7

Parcel ID	Description	Purpose 1 Score	Purpose 2 score	Purpose 3 score	Purpose 4 score	Overall score
P33	Land to the east of Burgh Heath Road south of Beech Way	3	2	2	0	7
P34	Land north of Epsom Golf Course east of Burgh Heath Road	2	2	2	0	6
P35	Land to the east of Longdown Lane South, south of College Road	1	3	2	0	6
P36	Land at Epsom College	1	2	1	2	6
P37	Land north of College Road west of Reigate Road	1	3	2	3	9
P38	Land to the east of Reigate Road north of railway line at North Looe	3	2	3	0	8
P39	Land to the east of Reigate Road west of Higher Drive at North Looe	2	2	2	0	6
P40	Land between Reigate Road and Banstead Road	2	2	2	1	7
P41	Land at Glyn School Sports Pavilion	2	3	2	1	8
P42	Land at and associated with NESCOL College	1	3	1	1	6
P43	Land to the east of NESCOL College	3	3	2	0	8
P44	Land to the west of Banstead Road south east of NESCOL College	2	3	2	0	7
P45	Land at DW Fitness Banstead Road	3	3	1	0	7
P46	Land north west of Cuddington Way	3	3	3	0	9
P47	Land south of Cheam Road	3	2	3	0	8
P48	Land at Cuddington Golf Course north of Cuddington Way	3	2	3	0	8
P49	Land south of Northey Avenue west of Sutton Grammar School Sports Ground	3	3	3	0	9
P50	Land at Sutton Grammar School Sports Ground	3	3	3	0	9
P51	Land to the south of Fairview east of Banstead Road	3	3	3	0	9
P52	Land to the east of Reigate Road	0	0	1	0	1
P53	Land south of Wheelers Lane north of Evelyn Way	3	3	3	3	12

Non-Green Belt Land

3.18. Discrete parcels of land immediately adjoining the defined Metropolitan Green Belt boundary within EEBC have been assessed for their suitability for inclusion within the Green Belt. As set out in Section 1 this Study does not seek to make recommendations for amendments to the existing Metropolitan Green Belt boundary. The Study has defined four discrete areas of land and has assessed them against the same criteria as designated Metropolitan Green Belt land in line with the criteria set out in Table 1. These areas are referenced NG01 to NG04 and are addressed in more detail below.

NG01

3.19. NG01 is a parcel of land directly adjacent to the north west corner of parcel P09 within the Chalk Lane Conservation Area. The roughly square Parcel is bordered to the north by Worple Road and to the west by Chalk Lane. St Martin's C of E Junior School is immediately to the east and an area of woodland lies to the south within parcel P09. The parcel contains business development consisting of business premises and associated car parking set within the grounds of the Grade II* listed Woodcote Grove. Redevelopment to update and increase the capacity of the site is currently underway.

3.20. If designated as Green Belt land, NG01 would be lower performing against purpose 1 to *'Check unrestricted sprawl of large built-up areas'*. The parcel does have durable and identifiable boundaries to the north and west being formed of Worple Road and Chalk Lane, but due to the presence of existing built development, especially at its southern boundary, the parcel would be lower performing. The parcel would also be considered as lower performing against purpose 2 to *'Prevent neighbouring towns merging into one another'* as it does not represent a gap between urban areas. The dense area of woodland immediately beyond the parcel's southern edge, within parcel P09, forms a natural barrier to the edge of the urban area from the area of open Green Belt land beyond which serves as part of the gap between urban areas within Epsom and Banstead to the south.

3.21. NG01 is immediately on the edge of the urban area and adjoins an area of woodland separating the urban edge from the more open area of Green Belt

beyond. NG01 would not serve a purpose in protecting the countryside from encroachment and, therefore, does not perform against purpose 3 to *'Assist in safeguarding the countryside from encroachment'*.

3.22. NG01 is within the Chalk Lane Conservation Area and provides the setting for the Grade II* Listed Woodcote Grove, which is also identified as a Focal Building within the Conservation Area Appraisal. The parcel benefits from key views in to the Conservation Area and on this basis, would perform highly against purpose 4 to *'Preserve the setting and special character of historic towns'*.



Parcel NG01 Land to the south of Worple Road east of Chalk Lane

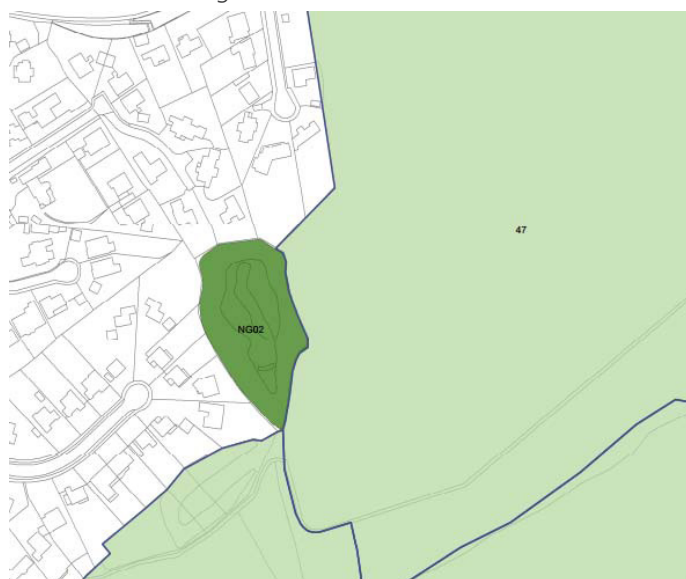
NG02

3.23. NG02 is a small discrete parcel of land directly adjacent to Parcel P47 at the end of Beverley Close in East Ewell. The roughly triangular parcel is made up of an area of mature woodland and is bordered by residential gardens to the north, west and south associated with properties on Beverley Close. The area of woodland extends eastwards to form an established hedgerow through the southern portion of the adjacent agricultural field within parcel P47.

3.24. If designated as Green Belt land, NG02 would perform more moderately against purpose 1 to *'Check unrestricted sprawl of large built-up areas'*. The parcel's boundaries are formed of residential gardens to the north, west and south which do not provide durable or easily identifiable boundaries. However, the parcel does not contain any ribbon or other development.

3.25. NG02 is on the eastern edge of the residential area within East Ewell and forms part of the gap between Belmont to the east and East Ewell to the west. As set out above, whilst these two areas adjoin in the area to the north of parcels P47, P49 and P50, the presence of Green Belt prevents further coalescence and collectively these parcels play an essential role in preventing the further merging of Belmont to the east and East Ewell to the west. If designated as Green Belt, NG02 would contribute to this role and would be considered as higher performing against purpose 2 *'to prevent neighbouring towns merging into one another'*.

3.26. The wooded nature of parcel NG02 means that it is generally characterised by countryside and it adjoins countryside to the east. If designated as Green Belt land, NG02 would be more moderately performing against purpose 3 to *'Assist in safeguarding the countryside from encroachment'*. Although the parcel directly adjoins agricultural fields within parcel P47, and whilst it is undeveloped, it is surrounded by urban development on three sides. The parcel would not perform against purpose 4 to *'Preserve the setting and special character of historic towns'* as it does not contribute to the setting of a Conservation Area.



Parcel NG02 Land to the east of Beverley Close

NG03

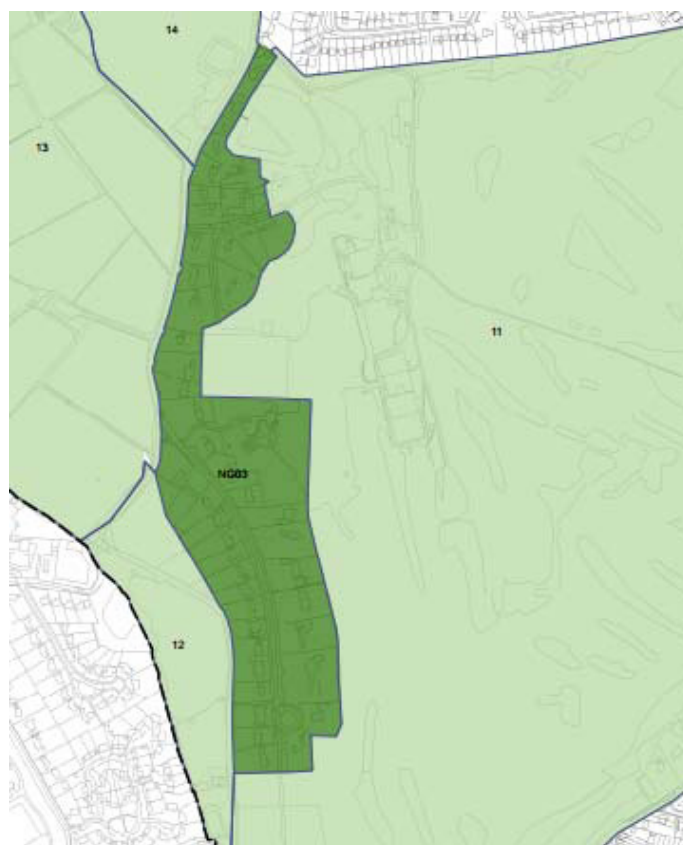
3.27. NG03 is a small strip of land at The Ridge in the south west of the borough located between designated Metropolitan Green Belt land at parcels P11-P14. The irregularly shaped parcel contains large

detached dwellings set in large individual plots bordered by a substantial area of tree cover to the west within parcel P12 and land associated with RAC Woodcote Park Country Golf Club within parcel P11 to the east. Agricultural fields adjoin to the north west within parcel P13.

3.28. Whilst the boundaries of NG03 are relatively well defined, being formed of well-established hedgerows and tree lines delineating the boundaries of the large residential plots, the presence of ribbon development means that NG03 would be lower performing against purpose 1 to *'Check unrestricted sprawl of large built-up areas'* if designated as Green Belt.

3.29. Although ribbon development is present within parcel NG03 it would, alongside parcels P12 and P13, form a gap of approximately 500 metres between the Woodcote area of Epsom to the north east and the eastern edge of Ashted to the west and south west. Therefore, if designated as Green Belt this parcel would perform highly against purpose 2 *'to prevent neighbouring towns merging into one another'*.

Parcel NG03 Land at The Ridge



3.30. If designated as Green Belt land, NG03 would be lower performing against purpose 3 to *'Assist in safeguarding the countryside from encroachment'*. Whilst surrounded by parcels which are characterised by countryside, NG03 has ribbon development present at The Ridge. The parcel would not perform against purpose 4 to *'Preserve the setting and special character of historic towns'* as it does not contribute to the setting of a Conservation Area.

NG04

3.3.1. NG04 is a large parcel of designated Green Space at Nonsuch Park in the north east of the borough at its boundary with the London Borough of Sutton to the east. The irregularly shaped parcel is formed of a large swathe of partly wooded open green land which borders the urban areas of Stoneleigh to the north west, Cheam to the east and East Ewell to the south.

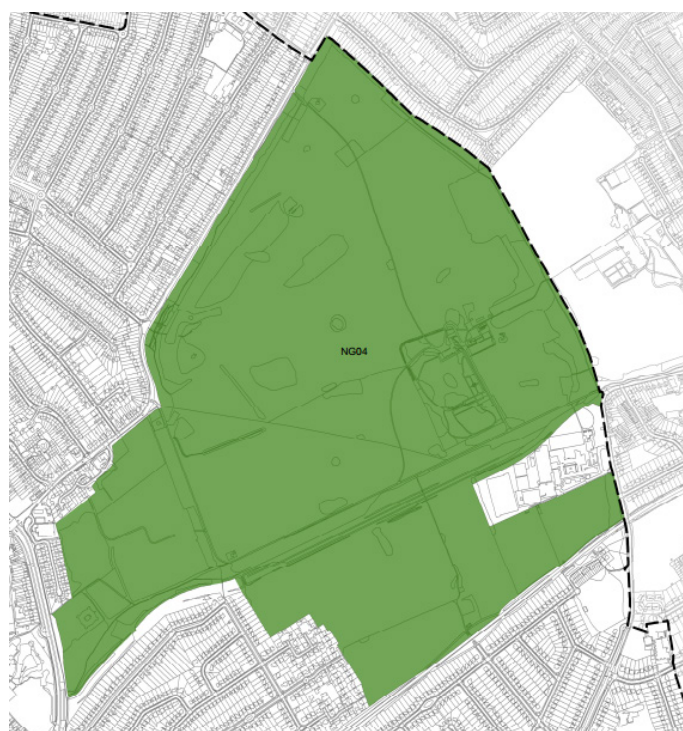
3.32. The boundaries of parcel NG04 are well defined by dense and well-established hedgerows, tree lines and groups of trees. The parcel is also free from development and therefore would perform highly against purpose 1 *'To check unrestricted sprawl of large built-up areas'* if designated as Green Belt.

3.33. NG04 forms an undeveloped open gap of approximately 1.3 kilometres between the urban areas of Cheam to the east and Stoneleigh to the west. Whilst these areas are adjoined in the area to the north of NG04, the parcel would, if designated as Green Belt land, play a role in preventing the further coalescence of these urban areas. Therefore Parcel NG04 would be considered moderately performing against purpose 2

'to prevent neighbouring towns merging into one another' if designated as Green Belt land.

3.34. Parcel NG04 is surrounded by urban development on all sides but is relatively substantial in size and free from urbanising development within its boundaries. By virtue of its designation as Green Space parcel NG04 is characterised by countryside and therefore would be more moderately performing against purpose 3 to *'Assist in safeguarding the countryside from encroachment'* if designated as Green Belt.

3.35. Parcel NG04 would not perform against purpose 4 to *'Preserve the setting and special character of historic towns'* as it is not within or on the edge of a Conservation Area.



Parcel NG04 Land at and adjoining Nonsuch Park

Table 3 - Non-designated Green Belt Scoring

Parcel ID	Description	Purpose 1 Score	Purpose 2 score	Purpose 3 score	Purpose 4 score	Overall score
NG01	Land to the south of Worple Road east of Chalk Lane	1	1	0	3	5
NG02	Land to the east of Beverley Close	2	3	1	0	6
NG03	Land at The Ridge	1	3	1	0	5
NG04	Land at Nonsuch Park	3	2	2	0	7

4. Overall performance

- 4.1. The majority of the Green Belt within EEBC benefits from strong, durable and obvious boundaries which assist in restricting the sprawl of urbanising development. This is reflected by 29 parcels out of the total 53 being assessed as performing highly against purpose 1 to '*Check unrestricted sprawl of large built-up areas*'. A further 12 parcels perform more moderately and are those parcels where boundaries are weaker being formed of, for example residential gardens associated with properties on the edge of the Green Belt. Six parcels have been assessed as lower performing against purpose 1 and are those parcels where there is limited urbanising development present for example at NESCOL and Epsom College. Those parcels that do not perform against purpose 1 are those at the hospital clusters and those that are entirely developed.
- 4.2. There is limited evidence of coalescence within the Green Belt with those areas which form a crucial gap between urban areas performing highly or more moderately against purpose 2 '*to prevent neighbouring towns merging into one another*'. This is particularly evident along the eastern edge of the borough at its boundary with the London Borough of Sutton to the east. Only 11 out of the 53 defined parcels were assessed as being lower performing or performing no role against purpose 2. These parcels are those that are already developed and therefore form no gap.
- 4.3. In general the parcels that perform highly against purpose 2 also perform highly against purpose 3 to '*Assist in safeguarding the countryside from encroachment*'.

Parcels that are generally characterised by countryside are largely those that are on the edge of the borough's boundary. These parcels are those that are forming critical gaps between urban areas. Other parcels that perform highly are those around Epsom Downs Racecourse where the borough is more open and rural in character.

- 4.4. The borough's Green Belt performs a more limited role in preserving the setting and special character of historic towns. There is, however a concentration of highly performing parcels around the hospital cluster which are crucial in preserving the setting and character of the former hospital sites.



Figure 4 - West Park Conservation Area



Figure 3 - Land at Epsom Downs Racecourse



Figure 5 - Land to the east of Chantilly Way

Notable Parcels

- 4.5. One parcel, P29 (Land to the east of Chantilly Way), does not perform against 2, 3 or 4. This parcel is a very small rectangular shaped area of land which, on the whole, does not perform well as Green Belt. The piece of land forms a 24 metre wide strip between the residential gardens associated with properties on Brettgrave and Chantilly Way. The parcel performs more moderately against purpose 1 by virtue of it being free from development.
- 4.6. Two parcels, Parcel P17 (Land at Epsom Common) and P53 (Land south of Wheelers Lane north of Evelyn Way) perform highly against all four purposes. Both parcels are located in the west of the borough immediately beyond the urban edge. These parcels are undeveloped and are maintaining the separation between the main urban area and The Wells to the west.

Conclusion

- 4.7. This Green Belt Study has demonstrated that the area of designated Metropolitan Green Belt land within Epsom and Ewell is, on the whole, highly performing. Whilst the character of the Green Belt varies greatly across the borough it continues to play a vital role in preventing urban sprawl, encroachment of the countryside and coalescence. The areas of Green Belt adjoining the borough's Conservation Areas are largely successful in preserving the setting and special character of them. Part of the borough's Green Belt at Epsom Downs Racecourse also plays a wider role in preserving the setting of the historic core of London by safeguarding clear views in to the City.



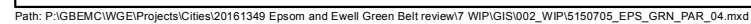
Figure 6 - Land at Epsom Common



Figure 7 - View of City of London from Epsom Golf Course

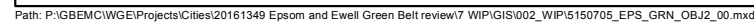
Appendices

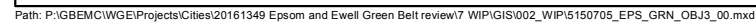


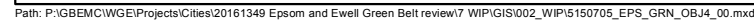


Appendix B - Purpose 1 (Map)









Appendix F - Consultees and Stakeholders

The following consultees were invited to comment on the draft methodology:

- CPRE
- Elmbridge Borough Council
- Epsom Civic Society
- Greater London Authority
- London Borough of Sutton
- Mole Valley Borough Council
- Reigate and Banstead Borough Council
- Surrey County Council

Representatives from the following key stakeholders attended the workshop held in December 2016:

- CPRE
- Elmbridge Borough Council
- Epsom Civic Society
- Mole Valley Borough Council
- Reigate and Banstead Borough Council
- Surrey County Council

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