

# Green Belt Topic Paper

## Exceptional Circumstances

December 2024

**Epsom and Ewell**  
**Local Plan** 2022-2040



# 1 Introduction

- 1.1 The Green Belt Topic Paper is one in a series of papers that sets out how the key strategies and themes of the Proposed Submission Epsom & Ewell Local Plan have been developed.
- 1.2 Each topic paper considers relevant national and local guidance that informed the development of the Epsom & Ewell Local Plan 2022 – 2040. The topic papers set out how the strategy, policies and allocations have developed in relation to this guidance and local evidence.
- 1.3 The topic papers do not contain any policies, proposals, or site allocations. The topic papers are intended to be ‘living’ documents, which will be updated throughout the plan-making process in order to reflect updated evidence, changes to the policy context, and the outcomes of the various stages of consultation and engagement. This paper outlines the considerations and process undertaken in determining the exceptional circumstances case for the release of Green Belt land to meet the needs within the Borough.
- 1.4 A draft Local Plan was published under Regulation 18 from 3 February to 19 March 2023. This consultation proposed a strategy based upon a brownfield focussed approach, with targeted increases in densities, particularly on various sites in the town centre (of which a Town Centre masterplan was prepared and now adopted), limited reuse of commercial and retail land and mixed use development. However, this approach alone did not address the significant shortfall in the assessed Local Housing Need and the Council also consulted upon the potential release of some greenfield options comprising the redevelopment of a small number of previously developed sites and greenfield sites on the outer parts of the Borough, which would involve release of land from the Green Belt.
- 1.5 In response to the 2023 consultation, comments were made about the level and need for Green Belt release and whether exceptional circumstances were justified. In response, the Council has prepared this Topic paper to demonstrate that exceptional circumstances exist for changing the Green Belt boundary.
- 1.6 This Topic Paper sets out a methodology which considers exceptional circumstances on a strategic level and embeds consideration of exceptional circumstances into the site selection process for the Regulation 19 Local Plan.
- 1.7 Section 2 of this Topic Paper set out the policy and legal context for the consideration of exceptional circumstances.

- 1.8 Section 3 then describes how the Council's Local Plan process for the consideration of exceptional circumstances responds to the policy and legal context, on both a strategic (whole plan) and site specific basis.
- 1.9 Section 4 describes how the exceptional circumstances process has been applied on a site-specific basis and the outcome of that process.
- 1.10 The role of this document is to set out the evidence which has informed preparation of the Regulation 19 Local Plan. Any alterations to the Green Belt boundary would take place through the ongoing Local Plan preparation process, including publication of the Regulation 19 Local Plan, submission of representations, the Examination in Public process and any further modifications prior to adoption.
- 1.11 Until such time as the Epsom and Ewell Local Plan is adopted, the Green Belt boundary remains as designated in the current Development Plan.

## 2 Section 2: Policy Background

2.1 National planning policy, including Green Belt policy, is primarily set out in the National Planning Policy Framework 2023 (NPPF), the Planning Policy for Traveller Sites (2023) and the national Planning Practice Guidance.

2.2 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). Sustainable development is that which best balances economic, social and environmental matters. Paragraph 11 states that for plan-making this means that:

*a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*

*b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>1</sup>, unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area<sup>2</sup>; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

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<sup>1</sup> As established through statements of common ground

<sup>2</sup> The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 72); and areas at risk of flooding or coastal change

- 2.3 NPPF Paragraph 60, sets out the Government's objective of "significantly boosting the supply of homes". The NPPF paragraph 23 states that "*strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development*" and that "*it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay*" (Paragraph 60).
- 2.4 The NPPF makes it clear that "*the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community*" (paragraph 60). Further detail on meeting the needs of different groups in the community is set out in NPPF paragraph 63.
- 2.5 In terms of the housing needs, paragraph 61 of the 2023 NPPF makes it clear that "*to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance*" but this latest revision to the NPPF has clarified that "the outcome of the standard method is an advisory starting point for planning authorities preparing a Local Plan".
- 2.6 The NPPF makes it clear that "*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*" (Paragraph 142). However, national policy does make provision for Local Authorities to make alterations to the Green Belt boundaries through the Local Plan process where exceptional circumstances are fully evidence based and justified (Paragraph 145).
- 2.7 Paragraph 145 sets out:  
"*Once established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan-making process. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans*".

## Exceptional Circumstances – Underlying Principles

2.8 The NPPF stipulates at paragraph 145 that Green Belt boundaries should only be altered in 'exceptional circumstances'. The NPPF (paragraph 146), sets out what needs to be demonstrated by Local Planning Authorities before determining that exceptional circumstances exist:

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

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

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

- 2.9 Paragraph 147 clarifies that ‘When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. The paragraph continues with ‘Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. It ends with the statement that plans ‘should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land’.
- 2.10 Paragraph 150 states that ‘*Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.*’
- 2.11 The use of the word ‘exceptional’ is not incidental and by default explains why little guidance is available to affected plan-making authorities primarily due to the fact that each Green Belt authority will have their own issues to overcome and therefore their own set of potentially exceptional circumstances.
- 2.12 The Draft Local Plan (Regulation 18) set out that the council considered that there were exceptional circumstances for amendment of Green Belt boundaries at a strategic level. This determination was made under the wording of the 2021 NPPF and as such it is considered that it warrants revisiting as the Local Plan reaches a more advanced stage.

### **Case Law Context**

- 2.13 As there is no formal definition or criteria to demonstrate exceptional circumstances, local planning authorities have reviewed case law to formulate an interpretation or a process of assessing whether exceptional circumstances exist. This, alongside the points in the above paragraphs will form the basis for the assessment in this topic paper.

### **Gallagher Homes case**

- 2.14 The [Gallagher Estates Ltd/Lioncourt Homes Ltd Vs Solihull Metropolitan Borough Council](#) EWHC 1283 (Admin) case suggested that to be “exceptional” circumstances, more should be required than “general planning concepts” or the re-assessment of a site’s planning merits, and that the test is “very stringent”:

### **Calverton Case**

- 2.15 The key relevant case law on the matter of assessing ‘exceptional circumstances’ is the case [Calverton Parish Council v Greater Nottingham Councils](#) [2015] EWHC 1078 (Admin). This sets out that the planning judgements involved in the consideration of exceptional circumstances to justify the release of Green Belt land for development. Paragraph 51 of the judgement states...

*...the planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:*

- i. the acuteness/intensity of the objectively assessed need (matters of degree may be important);*
  - ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
  - iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
  - iv. the nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and,*
  - v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*
- 2.16 In respect of point (v) the NPPF states at paragraph 147 that Local Plans should “also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”. [The National Planning Practice Guidance](#) (NPPG) goes further on this point and sets out the following guidance:

***How might plans set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements?***

*Where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt*



land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- new or enhanced green infrastructure;
- woodland planting;
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);
- improvements to biodiversity, habitat connectivity and natural capital;
- new or enhanced walking and cycle routes; and
- improved access to new, enhanced or existing recreational and playing field provision.

Paragraph: 002 Reference ID: 64-002-20190722 Revision date: 22 07 2019

***How can the strategic policy-making authority ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt will be secured?***

*Identifying the scope for compensatory improvements is likely to require early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified.*

*Consideration will need to be given to:*

*land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought; the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability; the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible.*

*Section 106 agreements could be used to secure long-term maintenance of sites.*

Paragraph: 003 Reference ID: 64-003-20190722 Revision date: 22 07 2019

### 3 Section 3

- 3.1 The [Draft Local Plan \(Regulation 18\)](#) published for consultation in February 2022 set out the exceptional circumstances for the strategic release of Green Belt as part of the Council's spatial strategy in paragraph 3.10

*'The council considers that the scale of unmet development / housing needs in the borough that would result from pursuing a brownfield only approach provides the exceptional circumstances and justification to make changes to the Green Belt boundaries in the borough'.*

- 3.2 The above was made on the basis that at the time the Regulation 18 Local Plan was prepared, urban sites could only accommodate 35.8% of the housing need established by the standard method at the time (576 dwellings per annum). The housing trajectory set out in the Regulation 19 Local Plan shows that 32% of housing need can be met on urban sites based on a housing need of the housing need established by the standard method (569 dwellings per annum or 10,242 over the plan period).

- 3.3 The [Epsom and Ewell Green Belt Technical note](#) published for consultation alongside the Draft Local Plan, provides a short chapter (chapter 4) on Exceptional Circumstances and identifies exceptional circumstances, proportionate to the stage of plan-making (Regulation 18). These are:

- A historic under delivery of housing as shown in the past and current [Authority Monitoring reports](#).
- A historic under delivery of affordable housing as shown in the past and current [Authority Monitoring reports](#).
- A lack of five-year housing land supply (most recent calculation suggests just over two years supply as set out in the [AMR 2023-2024](#)).
- A failure of the [Housing Delivery test](#). Where the last published results ([HDT 2022](#)) shows that the Council is one of the lowest performing in terms of the number of homes delivered against the housing need over the previous three years, consequently paragraph 79 of the NPPF applies where *'the presumption in favour of sustainable development applies, as set out in footnote 8 of this Framework, in addition to the requirements for an action plan and 20% buffer'*.
- The increasing levels of homelessness in the borough.
- 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).

3.4 The technical note identifies that Green Belt release provides 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 dwellinghouses.
- 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.
- deliver 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.

- 3.5 Whilst it is considered that the circumstances in 2022 have not changed to any material degree, it is considered appropriate to revisit this following updates to the NPPF in 2023 and in response to comments made during the consultation on the Draft Local Plan (Regulation 18) undertaken in February 2023.

### **The NPPF: Strategic Considerations**

- 3.6 In relation to NPPF para **146 (a)** *Make as much use as possible of suitable brownfield sites and underutilised land*. The Council has looked to make the best use of land and has investigated all opportunities to develop brownfield land within the borough's defined urban area that is not within the Green Belt. 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.
- 3.7 The Council has, on a number occasions, most recently July 2023 when updating the Land Availability Assessment (LAA) identified potential sites through a desk top review and wrote to freehold landowners to ask them to submit their sites for consideration for future development. The conclusions have informed the LAA 2024. The current housing trajectory shows that 32% of housing need can be met on urban sites.
- 3.8 The Council considers that there are no further opportunities to meet housing need in full on brownfield sites alone.
- 3.9 With regards to NPPF para **146 (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*. The Council has sought to maximise densities on the available land within the urban area having regard to local and sites specific constraints (e.g. heritage) where appropriate. Specifically, densities have been optimised as far as possible in quantifying potential yields on LAA sites where it would not have a significant negative impact on the character of the area.

- 3.10 The Council has also commissioned and recently published a Town Centre masterplan in September 2024 which set out guiding principles for the development and looked at various opportunity sites in the Town Centre. This set out 7 guiding principles including adopting a context-led design approach to guide the development, having particular regard to the impact of building heights, building design, materials and land uses will ensure new development contributes to an improvement in the quality of the town centre. This principle looked at a range of mainly low and mid-rise, high-density housing which would also afford excellent levels of residential amenity and complement the character of the town centre whilst using land efficiently.
- 3.11 The Council considers that there are no further opportunities to optimise densities, to meet housing need in full.
- 3.12 With regard to NPPF **para 146 (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. The Council has maintained continuous engagement with its neighbouring authorities regarding the unmet need, the dialogue has been consistent and clear. The Council has asked 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 are/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.
- 3.13 In light of the above, the exhaustion of these options and resultant scale of unmet development need is a significant and contributing factor leading Epsom and Ewell Borough Council to consider amending Green Belt boundaries.

## The Calverton Case Strategic Considerations

- 3.14 In terms of the Calverton case, it is considered that the first three points, in addition to the three criteria set out in Policy 146 of the NPPF, are matters that are best considered at a strategic level to inform a decision about whether exceptional circumstances exist for Green Belt release to be included in the local plan, without focusing on individual sites.
- 3.15 Points iv and v in the Calverton case are not strategic in their nature and can only be assessed on a site by site basis. Each site will vary in terms of how well they perform in relation to the Green Belt purposes applicable to them, the extent of harm arising from their development and the potential for mitigation. Each site has been assessed against points iv and v, which is set out in section 4.
- 3.16 With regards to the points of the Calverton Case the first three points are considered at this strategic level to inform a decision about whether exceptional circumstances exist for Green Belt release.
- (i) ***the acuteness/intensity of the objectively assessed need (matters of degree may be important)***
- 3.17 Case law establishes that this consideration relates solely to need for housing. The Council undertakes its calculation of Local Housing Need in accordance with the standard methodology required by the NPPF and NPPG. This generates a Local Housing Need of 569 dwellings per annum over the Local Plan period.
- 3.18 In addition to overall need for housing, the Housing and Economic Development Needs Assessment (HEDNA) published in 2022 identified a net need for 652 affordable homes per annum between 2022-2040 comprising of 574 rental properties and 78 affordable home ownership properties.
- 3.19 It is important to note that this test should also include an understanding of unmet housing need from elsewhere, starting first with areas within the Housing Market Area but also considering (with appropriate weight), other areas with strategic policy links to the Metropolitan Green Belt.
- 3.20 The Council has identified that unmet housing need exists or is likely to exist in several adjoining authorities, including those within the Housing Market Area, which is summarised below as identified through Memorandums of Understanding and will be covered in more detail in emerging Statements of Common Ground:
- Mole Valley District Council – Adopted their new Local Plan 2020-2039 in October 2024. Based on the constraints of the Borough and anticipated supply they arrived at a housing requirement below the Local Housing

Need. This will be accommodated on urban sites and 20 sites in the Green Belt. The shortfall of 1,700 between 2020 to 2037 (MVDC and EEBC DTC confirmed cannot help each other's unmet need)

- Royal Borough of Kingston Upon Thames –The new Local Plan has reached Regulation 18 stage – They have confirmed unlikely to meet each other's unmet need.
- Sutton – Preparing a New Local Plan – anticipate a shortfall in housing delivery against the need and therefore are unlikely to be able to assist
- Elmbridge – Plan under examination – not meeting need.
- Reigate and Banstead –They are maintaining 5 yr supply but unlikely to assist with unmet need of neighbours

	<b>EEBC</b>	<b>Mole Valley</b>	<b>Kingston</b>	<b>Sutton</b>	<b>Reigate and Banstead</b>
Housing Required per annum (HDT 2021-2022)	577	456	964	469 (886 based on the London Plan)	461
Existing Local Plan	Core Strategy 2007	Mole Valley Local Plan 2020-2039	Core Strategy 2012	Sutton Local Plan 2018	Core Strategy 2014 (reviewed 2019 and 2024)
Status of Local Plan	Imminent Regulation 19	Adopted 15 October 2024	Regulation 18	Regulation 18	LDS for emerging Local Plan
Proposed Housing Requirement	4700 (2022-2040)	2020-2039 6381 (336 p.a)	9640 (London Plan 2019-2029)	Reg 18 Option A 469 pa to 2029 and 403 pa to 2029-2040 Option B 667 pa Option C 886 pa	460 p.a
Housing planned for	4,916	6381	9678	N/A	7.4 years Five Year Land Supply Position
Unmet need	5,542 (10,242-4700)	1700	Unknown but unlikely to assist with unmet need of neighbours	Shortfall in all options	Unknown but unlikely to assist with unmet need of neighbours



***ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development***

3.21 Point i) focuses on the acuteness of housing need, in line with case law, but it is not housing alone that justifies consideration of exceptional circumstances. It is important to consider wider development needs within the Borough, before we can understand the availability of land and its contribution to sustainable development.

**Gypsy and Traveller Accommodation**

3.22 The Council's [Gypsy and Traveller Accommodation Assessment \(GTAA\)](#) was published in 2022 and assesses Traveller Needs up until 2040. Based on the planning definition based in the Planning Policy for Traveller Sites (PPTS) 2015, it identified a need for 10 Gypsy and Traveller Pitches. It also identified a need for 8 Gypsy and Traveller pitches for those that do not meet the planning definition.

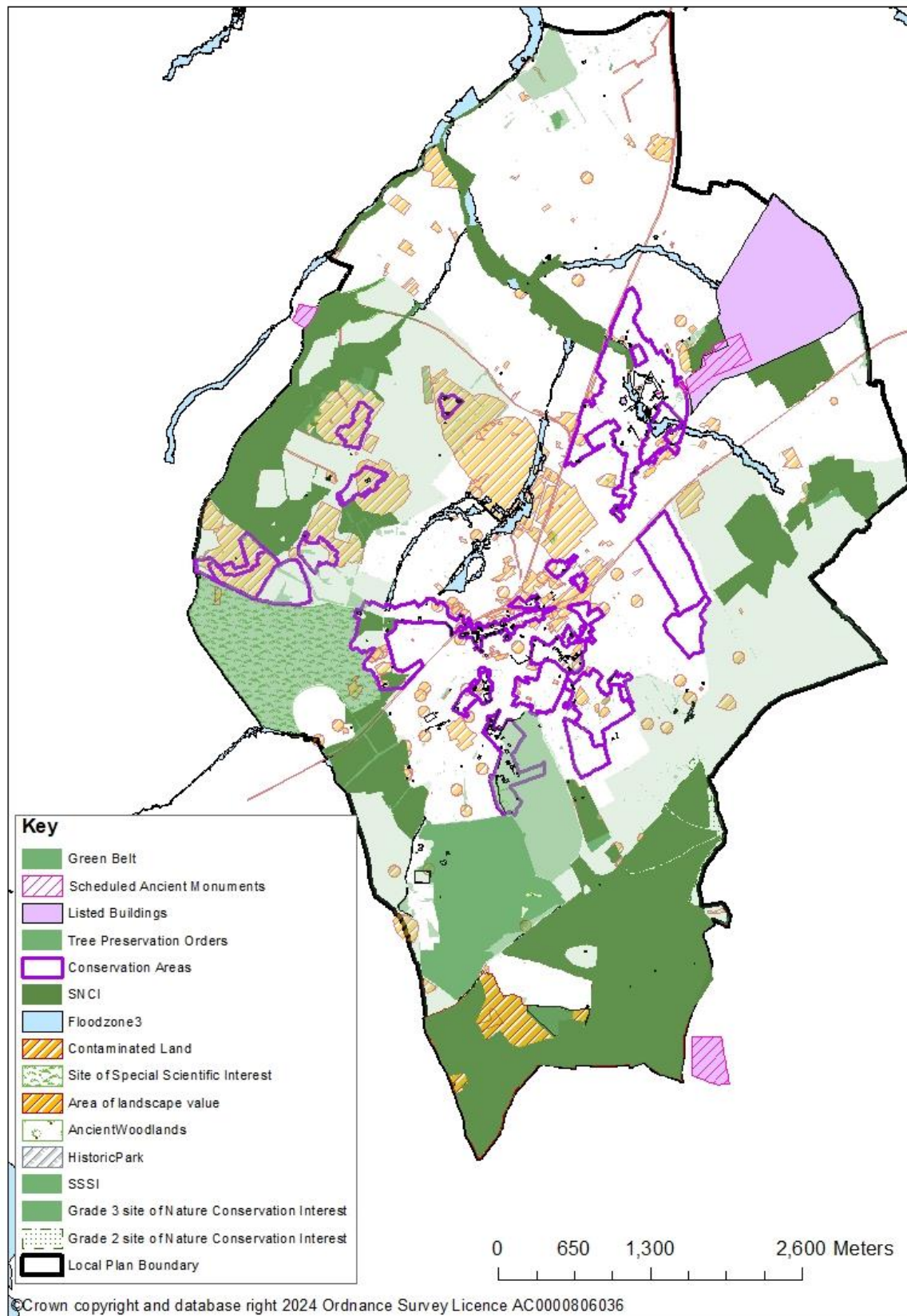
3.23 The PPTS was updated in 2023 and published alongside the NPPF updates. The PPTS has been updated to reflect the judgment in the Court of Appeal in the case of Smith v SSLUHC & Ors. Essentially the update reverts the definition of Gypsies and Travellers used in the Planning Policy for Travellers Sites to that adopted in 2012. As a result of this change, the need for Gypsy and Traveller Accommodation has increased from 10 to 18 pitches over the Local Plan period.

**Employment**

3.24 Local employment provision is an important element of sustainable development and contributes to both local and wider prosperity, whilst also limiting the need for people to commute. The HEDNA found that the supply of office, industrial and retail floorspace has been declining since 2023 and that evidence there was sufficient supply for 5.8 years for offices, 1.6 years for industrial and 2 years for retail. The recommendation is that the Council should secure warehousing and industrial floorspace supply in the key industrial estates and that sufficient office floorspace is provided in the market.

## Open Space, Sports and Recreation

- 3.25 In general, the Borough is well provided for in terms of quantities of publicly accessible open space. Natural and semi-natural open space provision is the most abundant per 1,000 population in the Borough (9.55 ha), followed by parks & gardens and recreation grounds (0.7 ha), amenity green space (0.67 ha) and allotments (0.17ha).
- 3.26 In broad terms the amount of publicly accessible open space appears to be balanced. Although with a slight under provision of parks and gardens and recreation grounds. As such, losses of publicly accessible open spaces should therefore be avoided unless suitable alternative provision can be made elsewhere. Future population growth will result in a reduction per person in the quantity of publicly accessible open space provision should no additional spaces be provided. Therefore, new developments will play an essential part in any additional provision.
- 3.27 In terms of accessibility, most of the urban areas within the borough have access to a category of public open space. There was only one area which was identified as being deficient in access to many categories of publicly accessible open space. This is an area within Epsom town centre, adjacent to Hook Road and the gas holders.
- 3.28 The inherent constraints within the borough make it challenging to accommodate the development needs identified. Highly restrictive constraints include those that would effectively preclude development include Flood Zone 3b, Sites of national nature conservation importance (Sites of Special Scientific Interest (SSSI) and Common Land. None of the sites promoted in the Green Belt contained these constraints and therefore all promoted sites have been assessed.
- 3.29 The borough also contains other constraints which further limit the availability of land for meeting development needs. These include: Area of Great Landscape Value (until such time as a review), registered park and garden, Sites of Nature Conservation Interest SNCIs, other areas of flood risk. When taken together the constraints impact a significant proportion of the Borough within and outside the Green Belt.
- 3.30 There is no other land type other than urban area and Green Belt. The borough is the smallest Borough in Surrey and has the highest density. This suggests that the small available land that is suitable is most likely already well and used efficiently.



Map of constraints

***iii)(on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;***

- 3.31 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 3.36% of the borough's greenfield Green Belt for future development 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.
- 3.32 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.
- 3.33 In summary, the land supply available for meeting the borough's development needs in sustainable and unconstrained locations is limited, with the only option remaining is towards the Green Belt.

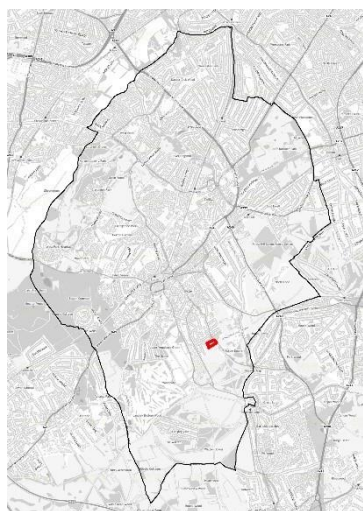
## 4 Section 4

4.1 This section considers exceptional circumstances on a site-specific basis. Each of the promoted GB sites are considered against the two remaining Calverton Case tests

- iv. *the nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and,*
- v. *the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.*

## Site Specific Exceptional Circumstances Proformas

### Land West of Burgh Heath Road COL017



Total Site Area: 1.52 ha  
Assessed Yield: 50 residential units

#### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P32	Land to the west of Burgh Heath Road east of Rifle Butts Alley	3	2	2	7

#### Site description

The site is an agricultural field located at the southern edge of settlement near Epsom Downs. The surrounding area comprises of various paddocks and stables.

The land rises above the existing properties on Beech Road.

The eastern and western boundary are well vegetated, screening the site from view, however the site appears elevated from the road and alley.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores high against purposes of the GB in terms of sprawl. It scores moderately for the purposes of merging and safeguarding the countryside from encroachment.

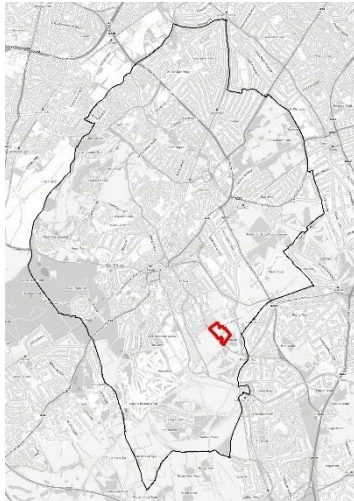
There are no landscape designations but the site is



	<p>an open field, elevated and rising towards sensitive landscape to the south. There are urban features as it adjoins properties on Burgh Heath Road and Beech Road</p> <p><u>Defensible Boundaries</u></p> <p>The site is defined on all sides except the southern boundary does not follow a physical feature.</p> <p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary. However permission has been granted for an 'enabling' scheme to the south for equestrian and residential development- which leaves this site vulnerable to infilling in the future.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary, but as mentioned a permitted enabling development to the south of this site leaves the site at risk of being infilled.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered to be of high in the area, being considered as a transitional landscape between the built up edge and the more sensitive landscape to the south.</p> <p>The impact could be ameliorated by careful master planning and a landscape and visual impact assessment LVIA should be carried out. The use trees and natural features could be used to screen/soften views. However, the land form in the area consists of steeply rising land to the south potentially limiting any effective mitigation measures here.</p> <p><u>Biodiversity</u></p> <p>The site does not have any particular ecological designation. Although the site is located within the 'North Downs' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p>

	<p><u>Access to open space/ countryside</u></p> <p>The size of the site may limit what can be achieved in terms of new open space.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	<p>Whilst it is recognised that the enabling development has extended development further south leaving the site at greater risk of infilling/ development.</p> <p>At present the site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p>

#### Land east of Burgh Heath Road (LAA reference COL019)



Total Site Area: 8.82 ha

Assessed Yield: 300 residential units

#### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P32	Land to the west of Burgh Heath Road east of Rifle Butts Alley	3	2	2	7

#### Site description

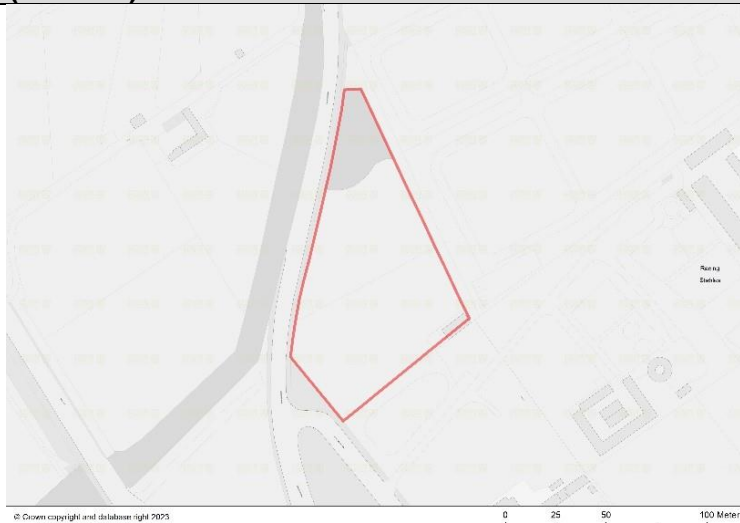
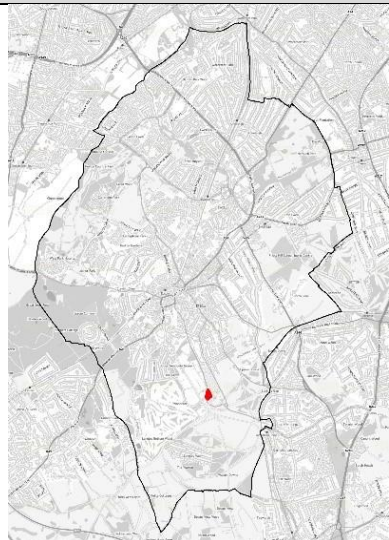
The site is a series of various sized agricultural field located at the southern edge of settlement near Epsom Downs. There is an enclave of new dwellings directly north of the site which has extended the settlement edge here. The



	surrounding area comprises of various paddocks and stables.
What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))	<p>The site scores high against purposes of the GB in terms of sprawl. The site scores moderately against the purpose of merging and safeguarding the countryside from encroachment.</p> <p>There are no landscape designations but the site is a series of open fields, elevated and rising towards sensitive landscape to the south. The land uses are pastoral, typical of the edge of settlement, a series of small field sub-divisions generally well-managed, with well-defined hedgerows.</p> <p>This series of fields form part of the small-scale transition between the southern Epsom settlement edge and the slopes of Epsom Downs and the golf course use to the south of the land parcel. This site is also adjoined by a small number of large infill plots development to the south which is accessed via Burgh Heath Road.</p> <p>New development is located to the north of the land parcel, extending the southern settlement edge of Epsom.</p> <p><u>Defensible Boundaries</u></p> <p>The site is defined by physical features, mainly field hedging and property boundaries. However, the site is an awkward shape and may make it vulnerable to further infill of adjacent parcels.</p> <p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary.</p>
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary into an increasingly sensitive landscape setting. Built development could be focussed at the northern part of the site with retaining a green buffer to the south.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered high in the area, with steep contours, the area is considered as a transitional landscape between the built up edge and the more sensitive landscape to the south</p>

	<p>The impact could be ameliorated by careful master planning. The use trees and natural features could be used to screen/soften views. However, the land form in the area consists of steeply rising land to the south potentially limiting any effective mitigation measures here.</p> <p><u>Biodiversity</u></p> <p>The site does not have any particular ecological designation. Although the site is located within the 'North Downs' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p>Site is also adjacent to SNCI to the south.</p> <p><u>Access to open space/ countryside</u></p> <p>The inclusion of new open space would increase accessibility here.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	<p>Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p>

## Land near Downs Road -north (COL020)



Total Site Area: 0.77 ha

Assessed Yield: 0

Proposed for Woodland (linked to COL023)

Parcel 3 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P07	Land between Downs Road and Ashley Road	3	2	2	7

Site description

The site is a small paddock, open with no buildings. The parcel is a small pocket of land set away from the settlement edge.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores high against purposes of the GB in terms of sprawl. The site scores moderately against the purpose of merging and safeguarding the countryside from encroachment.

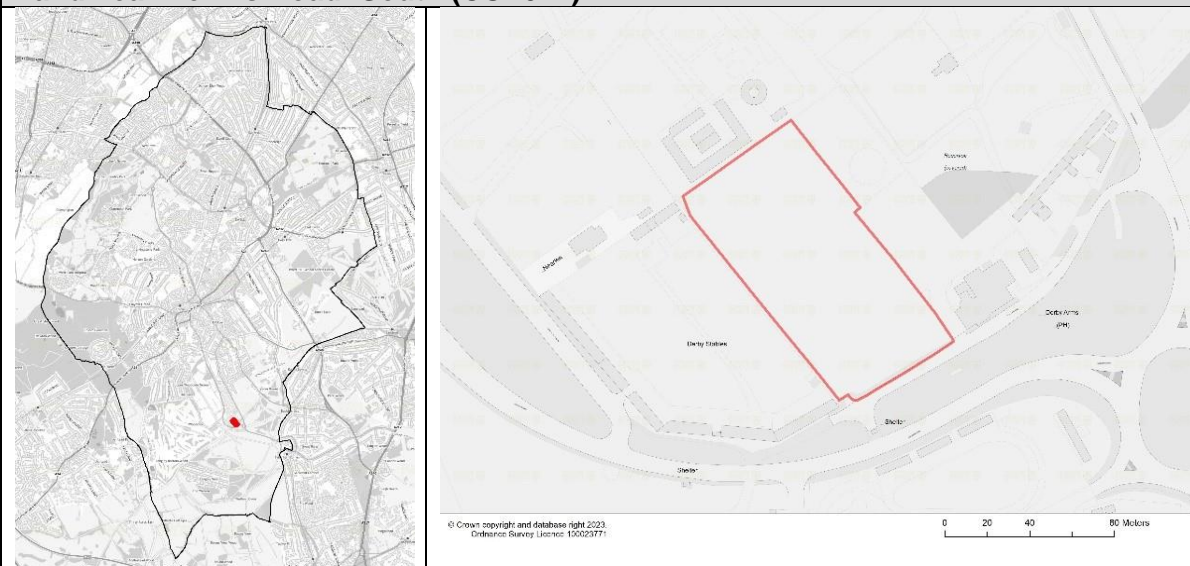
There are no landscape designations but the site sits within area between the built up limits and the more sensitive landscapes towards the south.

### Defensible Boundaries

The site is contained by a well defined hedge/tree boundary.

	The proposed woodland use would not require changes to the Green Belt.
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p>The proposed woodland use would not require changes to the Green Belt.</p> <p>The site boundaries are well defined.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered high in the area, being considered as a transitional landscape between the built up edge and the more sensitive landscape to the south.</p> <p><u>Biodiversity</u></p> <p>The site sits adjacent to areas of nature conservation and there are opportunities for the site to connect to and enhance the green corridors here.</p> <p><u>Access to open space/ countryside</u></p> <p>Opportunity to enhance open space and access to the countryside if the proposal allowed for public access.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	<p>Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p> <p>The proposal for woodland creation would not be inappropriate development and does not require changes to the GB boundary</p>

## Land near Downs Road -South (COL021)



Total Site Area: 0.8 ha

Assessed Yield:

0, Proposed as part of wider site including Housing, leisure, cultural (COL020, 21, 23 and WOO019

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P07	Land between Downs Road and Ashley Road	3	2	2	7

Site description

The site is a small paddock, open with no buildings.

The parcel is a small pocket of land set away from the settlement edge.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores high against purposes of the GB in terms of sprawl.

The site scores moderately against the purpose of merging and safeguarding the countryside from encroachment.

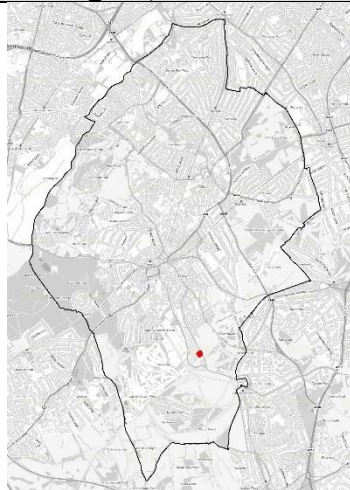
There are no landscape designations but the site sits within area between the built up limits and the more sensitive landscapes towards the south.

### Defensible Boundaries

The site is contained by a well defined hedge/tree boundary.

	The proposed woodland use would not require changes to the Green Belt.
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p>The proposed woodland use would not require changes to the Green Belt.</p> <p>The site boundaries are well defined.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered high in the area, being considered as a transitional landscape between the built up edge and the more sensitive landscape to the south.</p> <p><u>Biodiversity</u></p> <p>The site sits adjacent to areas of nature conservation and there are opportunities for the site to connect to and enhance the green corridors here.</p> <p><u>Access to open space/ countryside</u></p> <p>Opportunity to enhance opens space and access to the countryside if the proposal allowed for public access.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	<p>Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p> <p>The proposal for woodland creation would not be inappropriate development and does not require changes to the GB boundary</p>

#### Clear Heights, Downs Road (COL022)



Total Site Area: 0.4 ha



Assessed Yield: 11 residential units

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P07	Land between Downs Road and Ashley Road	3	2	2	7

Site description

The site is a two storey detached property with garden land, surrounding by a well vegetated boundary.  
The site is set away/detached from the settlement edge.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores high against purposes of the GB in terms of sprawl. The site scores moderately against the purpose of merging and safeguarding the countryside from encroachment.

There are no landscape designations but the site sits within area between the built up limits and the more sensitive landscapes towards the south.

#### Defensible Boundaries

The site is contained by a well defined hedge/tree boundary.

The site is previously developed single dwelling. Therefore, there is already impact on openness. Intensification of development will impact on openness for very limited benefit.

To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))

#### Landscape and visual sensitivity

The landscape and visual sensitivity is considered high in the area, being considered as a transitional landscape between the built up edge and the more sensitive landscape to the south. The site could be completely screened by hedging.

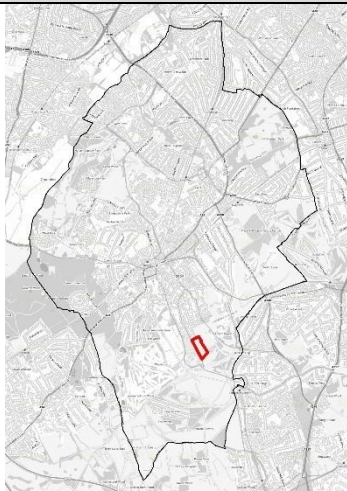
#### Biodiversity

The site sits adjacent to areas of nature conservation and there are opportunities for the site to connect to and enhance the green corridors here.

#### Access to open space/ countryside

	The site is too small to really accommodate publicly accessible open space.
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	<p>Having weighed up the issues outlined above and taking into consideration the small site that would yield a relatively small amount, it is considered that this does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p> <p>Nevertheless, redevelopment of PDL part of the site would not be inappropriate development and would not require exceptional circumstances to be demonstrated.</p>

#### Land near Downs Road-east (COL023)



Total Site Area: 7.21 ha

Developable Area:  
Northern half for site is proposed  
for residential

Assessed Yield;  
160 residential units





Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P08	Land to the east of Downs Road	3	2	3	8

Site description

The site forms a series of small- scale paddocks/ fields which lead to Epsom Downs golf course and the wider Downs. The surrounding hedgerows/tree belt are fairly tight but there are gaps in the vegetation allow for views into the site. These fields form part of the transition between the Epsom settlement edge.

There is a large cemetery to the west extending from Treadwell Road down to the south to the edge of The Downs.

The aspect of the site is north-east facing and there is a significant change in level rising up towards the south.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores high against purposes of the GB in terms of sprawl and safeguarding the countryside from encroachment.

The site scores moderately against the purpose of merging.

There are no landscape designations but the site is a series of open fields, elevated and sloping towards sensitive landscape to the south.

The site is attached to the settlement edge.

Defensible Boundaries

The site is contained by a well defined hedge/tree boundary.

The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary.

To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))

Landscape and visual sensitivity

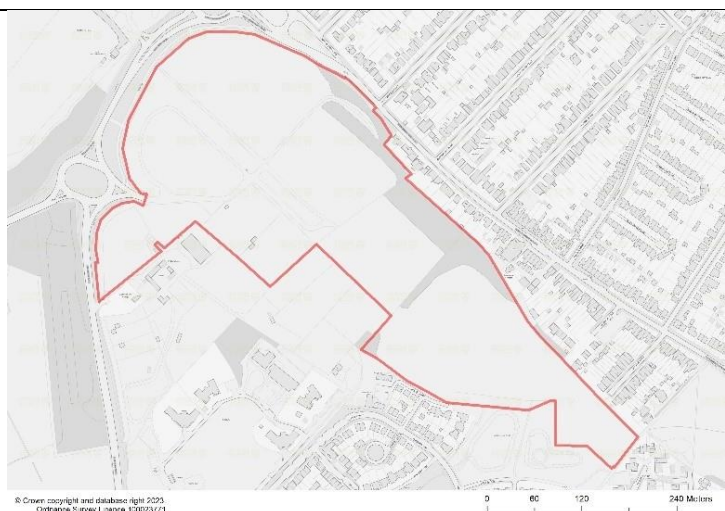
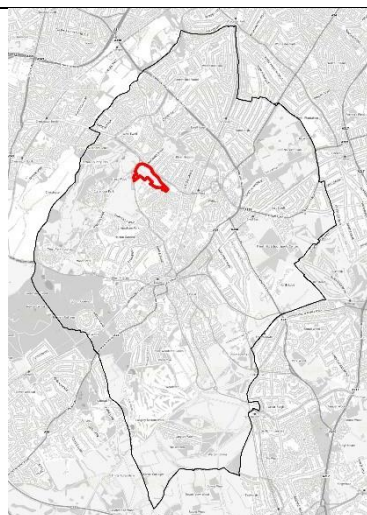
The landscape and visual sensitivity is considered high in the area, being considered as a transitional landscape between the built up edge and the more sensitive landscape to the south.

The impact could be ameliorated by careful master planning. Development could be focused to the

	<p>northern field, reducing sprawl further south. The use trees and natural features could be used to screen/soften views and to the southern part of the site could remain open.</p> <p>However the land form in the area consists of steeply rising land to the south potentially limiting mitigation measures here.</p> <p><u>Biodiversity</u></p> <p>The site is located within the 'North Downs' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p>The site sits adjacent to areas of nature conservation on two sides and there may be opportunities for the site to connect to and enhance the green corridors here</p> <p>In addition, enhancement of other sites COL020, COL021 and WOO019 would improve biodiversity</p> <p><u>Access to open space/ countryside</u></p> <p>New public open space proposed as part of the site and in combination with other sites COL020, COL021 and WOO019 would improve public accessibility to open space</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

#### Hook Road Arena COU026

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Total Site Area: 13.74 ha

Developable Area: South East with sports facilities to the North West

Assessed Yield:

A new sports hub to include playing pitches, a pavilion and changing facilities on the majority of the site. Approximately 100 homes are also proposed as enabling development on the eastern part of the site (which is surrounded on three sides by existing residential development).

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P31	Land to the north west of St Ebba's former hospital site	2	3	2	7

Site description

The site sits at the edge of the built up limits and between residential areas on either side of the Chessington Road and is therefore greatly influenced from these areas.

The open space is flat. The boundary edge is well vegetated with scrub, hedging and trees, the parcel is further sub-divided into variable-sized fields by a series of mature hedgerows/tree line. There are L shaped group of TPOs located midway of the site.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

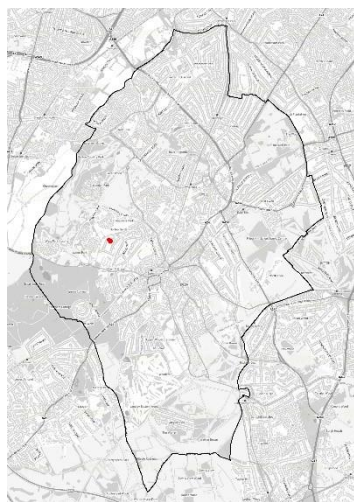
The site scores high against purposes of the GB in terms merging. It scores moderately against the purpose of sprawl and safeguarding the countryside from encroachment.

There are no landscape designations but the site is a large public open space.

	<p>Whilst the site provides a wedge between the residential areas, the scale and position of the proposed development focused to the south of the site will reduce any potential impact in the context of the wider landscape and Green Belt.</p> <p>The site, particularly to the south is substantially affected by the adjacent residential areas and associated busy road network of Hook Road and Chessington Road.</p> <p>The site is self contained, views in and out are largely screened. The southern part of the site is less screened and views from the southern bridleway and from St Ebbas estate.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p><u>Defensible Boundaries</u></p> <p>The boundaries consist of bridleway to the south, vegetated boundary to the rear of properties up to the roundabout to the east, Horton Lane to the north and the vegetated boundaries along the riding school and St Ebbas estate. The site has clear well defined boundaries.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered to be low, as it is not rare in the context of the wider character area, it is fairly flat and well screened. Development is proposed to be focused to south of the site which would reduce sprawl and encroachment into the countryside.</p> <p>The impact of development on the landscape could be ameliorated by careful masterplanning to maintain a green buffer/s or wedge/s to emphasise openness particularly to the north where there it moves further away from the built up core. A landscape and visual impact assessment LVIA should be carried out.</p> <p><u>Biodiversity</u></p> <p>There are no ecological designations on or near the site.</p> <p>The site has some grouped TPOs which could be incorporated and connect to surrounding green infrastructure network in the area.</p> <p><u>Access to open space/ countryside</u></p>

	There are no initial concept plans but the site promoters have indicated the potential to accommodate one or more outdoor sports facilities, these could be located to the north to maintain open area here. This would make a positive contribution towards provision of playing pitches, a pavilion and changing facilities to contribute towards the Borough's sport and recreation needs
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

#### Cuddington Glade (LAA reference HOR001)



Total Site Area: 0.52 ha

Assessed Yield:  
10-15 residential units

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P22	Land at and immediately surrounding Horton former hospital site	0	0	1	1

Site description

The site is a small area of semi natural amenity land

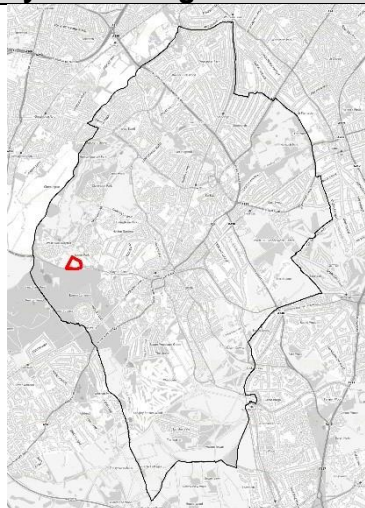
	<p>/open space adjacent a small number of residential properties. The site is overgrown and does not appear to be accessible.</p> <p>The site sits in the vicinity to Epsom Common/SSSI to the south of Christ Church Road.</p>
<p>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</p>	<p>The site forms a small part of a wider GB parcel which scores low against purposes of the GB in terms safeguarding the countryside from encroachment. It scores zero against merging and sprawl.</p> <p>There are no landscape designations.</p> <p><u>Defensible Boundaries</u></p> <p>Follows the physical boundary although is an awkwardly shaped site that leaves it vulnerable to further infill of adjacent parcels. Compromising the integrity of the boundary here through the slow ebbing away of small areas of Green Belt.</p> <p>The site is also rather small, therefore there is limited benefit from the quantum of development against its impact on the openness here.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p>The main impact from the development of this site would be extension of the built and countryside encroachment.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered to be low with no particular designations.</p> <p>The impact could be ameliorated by careful master planning to emphasise openness. Height, mass and density of development could be carefully considered and natural features could be used to soften or screen views of the built form. However, the size of the site and on site constraints (TPO to the east), taking into account the character of the area, would severely limit the quantum of development.</p> <p><u>Biodiversity</u></p> <p>The site is overgrown and has a semi natural quality. It sits adjacent to Epsom Common whether the proximity of development next to the SSSI may be a concern.</p>
<p>Concluding Assessment of whether there are exceptional</p>	<p>Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional</p>



circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.

Circumstances justifying an amendment to the Green Belt boundary.

### Hollywood Lodge HOR002



Total Site Area: 4.9 ha  
Assessed Yield: 50 residential units.

#### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P21	Land to the east of West Park former hospital site	3	3	2	8

#### Site description

The site is a large property that has become derelict and no longer in use. The buildings have been subject to vandalism. The buildings sit within an extensive garden area. The vegetation is overgrown and does not appear to be managed.

The buildings and hardstanding are existing development on the site that would be considered to be previously developed.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores high against purposes of the GB in terms of sprawl and merging. It scores moderately against the purpose of safeguarding the countryside from encroachment.

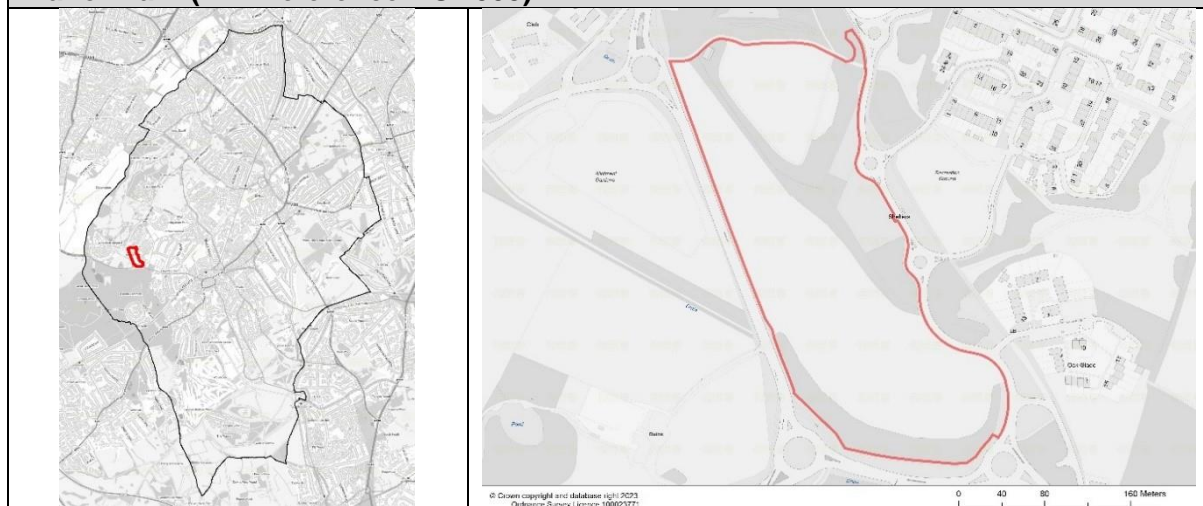
There are no landscape designations the site is fairly self contained.

	<p><u>Defensible Boundaries</u></p> <p>Follows the physical boundary although is an awkwardly shaped parcel that leaves it vulnerable to further infill of adjacent parcels. Compromising the integrity of the boundary here.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p>The main impact from the development of this site would be extension of the built form and closing the gap between the built form.</p> <p>The site boundaries are well defined vegetation along the roads and PROWs.</p> <p><u>Derelict land/buildings</u></p> <p>The redevelopment of the site offers the opportunity to make use of a derelict site/building and improve the quality of the environment here.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered to be low.</p> <p>The impact could be ameliorated by careful masterplanning to emphasise openness. Height, mass and density of development could be carefully considered and natural features could be used to create a green buffer and to soften or screen views of the built form.</p> <p><u>Biodiversity</u></p> <p>The site sits adjacent to Epsom Common and there are opportunities for the site to enhance the green corridors and in the area. On the other hand the proximity of development next to the SSSI may be a concern.</p> <p>The site is located within the 'Thames Basin Lowlands' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p><u>Access to open space/ countryside</u></p>



	There is a good Public Rights of Way (PROW) network which could link up the site.
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

#### Manor Park (LAA reference HOR003)



Total Site Area: 6.2 ha  
Assessed Yield: 90 residential units

#### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P22	Land at and immediately surrounding Horton former hospital site	0	0	1	1

#### Site description

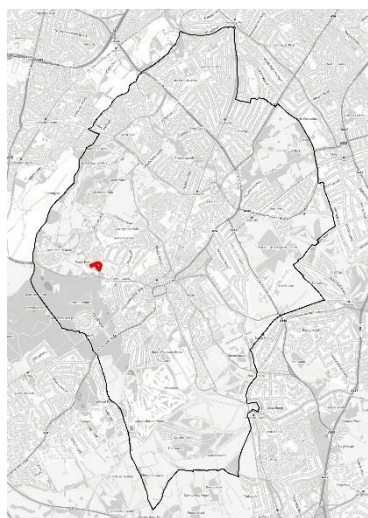
The site is an open amenity grassland with vegetated edges. There is significant tree coverage, many are protected (TPO). Some mown grassland but most of the site is in a semi-natural state. The site inaccessible to the south where it is fenced off.

The landscape is self contained and possesses semi natural qualities that blend in well with the character of the surrounding area and it's vicinity to Epsom Common/SSSI to the south of Christ Church Road. In this area, new build development is scattered in a semi rural parkland setting.

<p>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</p>	<p>The site scores low against purposes of the GB in terms safeguarding the countryside from encroachment. It scores zero against merging and sprawl.</p> <p>There are no landscape designations and the site is fairly self contained. However the northern part of the site is within a conservation area</p> <p><u>Defensible Boundaries</u></p> <p>Follows the physical boundary although is an awkwardly shaped parcel that could leave it vulnerable to further infill of adjacent parcels. Compromising the integrity of the boundary here.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p>The main impact from the development of this site would be extension of the built form and closing the gap between the built form.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape sensitivity is considered to be low and visual sensitivity moderate due to it's location within conservation area to the north.</p> <p>The impact could be ameliorated by careful masterplanning to emphasise openness. Height, mass and density of development could be carefully considered and natural features could be used to create a green buffer and to soften or screen views of the built form.</p> <p><u>Biodiversity</u></p> <p>The site is located within the 'Thames Basin Lowlands' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p>The site sits adjacent to Epsom Common proximity of development next to the SSSI may be a concern. The site may also enable opportunities for to enhance the corridors and in the area</p> <p><u>Access to open space/ countryside</u></p>

	There is a good Public Rights of Way (PROW) network and public open space in the area at present
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

#### Land off Cuddington Glade (LAA reference HOR004)



Total Site Area: 1.11 ha  
Assessed Yield: 30-50 residential units

#### Stage 1 score

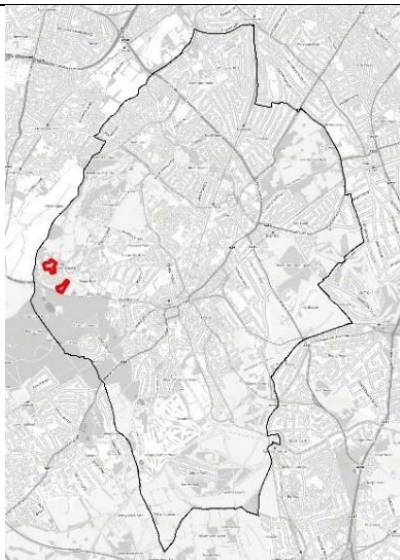
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P22	Land at and immediately surrounding Horton former hospital site	0	0	1	1

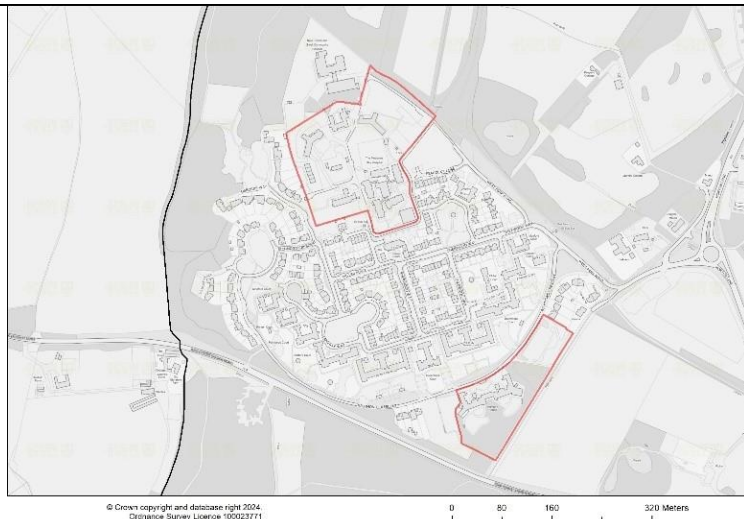
#### Site description

The site is a small area of semi natural amenity grassland, with scattered trees (TPO). It is self contained and not particularly sensitive. It's semi natural qualities does blend in well with the character of the surrounding area in the it's vicinity to Epsom Common/SSSI to the south of Christ Church Road.

The character of the area is new build development scattered in a semi natural parkland setting.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))	<p>The site scores low against purposes of the GB in terms safeguarding the countryside from encroachment. It scores zero against merging and sprawl.</p> <p>There are no landscape designations.</p> <p><u>Defensible Boundaries</u></p> <p>Follows the physical boundary although is an awkwardly shaped parcel that leaves it vulnerable to further infill of adjacent parcels. Compromising the integrity of the boundary here</p> <p>The site is small, therefore there is limited benefit from the quantum of development and its impact openness.</p>
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape sensitivity and visual sensitivity is considered to be low.</p> <p>The impact could be ameliorated by careful masterplanning to emphasise openness. Height, mass and density of development could be carefully considered and natural features could be used to soften or screen views of the built form.</p> <p><u>Biodiversity</u></p> <p>The site sits adjacent to Epsom Common and there are opportunities for the site to enhance the green corridors in the area. On the other hand the proximity of development next to the SSSI may be a concern.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.





Total Site Area:  
Northern site 3.7 ha, Southern site 1.97 ha

Assessed Yield:  
Approximately 50 dwellings (C3)

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P20	Land at and immediately surrounding West Park former hospital site	1	0	1	2

Site description

West Park is a former hospital site which has been redeveloped into a largely residential area but where some clinical uses still remain. This previously developed site comprise of NHS buildings and parking that are surplus to requirements.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores low against purposes of the GB in terms of sprawl and safeguarding the countryside from encroachment. It scores zero against merging.

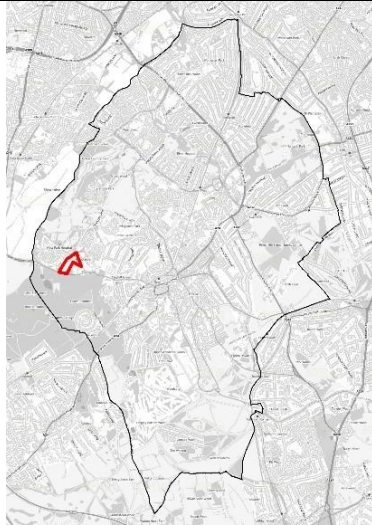
The sites forms part of a former hospital cluster and consists mainly of built development within the Green Belt and there is little in terms of open landscape. The site/s is within (south) and next to (north) to a conservation area.



	<p>The site is previously developed so the impact on openness will be limited and will depend on the development proposed.</p> <p>West Park is within a clearly defined landscaped parkland setting.</p> <p><u>Defensible Boundaries</u></p> <p>The former hospital site is now a largely urbanised housing estate that currently remains washed over by the Green Belt. The area of West Park has been assessed for 'openness' and for potential inseting in Section 2 and the proposed area for potential future development would fall within the proposed boundary for inseting.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p><u>Redevelopment of underutilised PDL</u></p> <p>Previously developed site within the Green Belt. The redevelopment of the site would result in the efficient use of underutilised PDL site.</p> <p>The impact from the development could be minimised if designed sensitively.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape sensitivity is low as the area is previously developed. However the site provides a backdrop to surrounding conservation area.</p> <p>The impact could be ameliorated by careful master planning to emphasise openness. Height, mass and density of development could be carefully considered and natural features could be used to soften or screen views of the built form. A landscape and visual impact assessment LVIA should be carried out.</p> <p><u>Biodiversity</u></p> <p>The site sits adjacent to areas of nature conservation and there are opportunities for the site to enhance the green corridors in and around the area.</p> <p><u>Access to open space/ countryside</u></p> <p>There is a good Public Rights of Way (PROW) network which could link up the site.</p> <p><u>New public open space could enhance accessibility.</u></p>
<p>Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.</p>	<p>Having weighed up the issues outlined above, the site is previously developed which would not require it is considered that this site does exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p>



## Nobel Park extension (LAA reference HOR007)



Total Site Area: 7.32 ha

Assessed Yield:  
90 residential units

### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P21	Land to the east of West Park former hospital site	3	3	2	8

### Site description

The site comprises of two parcels, allotments to the north and open land to the south. The existing vegetation to the south is overgrown and has a neglected appearance. In general, little is visible from the footpath, the whole parcel, including the Hollywood Lodge to the east (HOR002).

The southern boundary, eastern boundary and PROW footpath that bisects the parcel are covered by group TPO.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

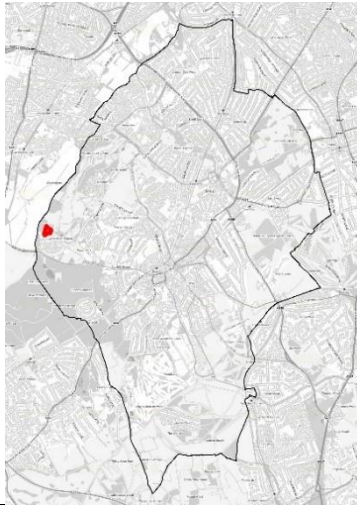
The site scores high against purposes of the GB in terms of sprawl and merging. It scores moderately against the purpose of safeguarding the countryside from encroachment.

There are no landscape designations and whilst adjacent to conservation area, the site is fairly self contained and cut off from it.

### Defensible Boundaries

	Follows the physical feature well defined vegetated boundary along roads and PROWs. The site is an awkwardly shaped parcel that leaves it vulnerable to further infill of adjacent parcels.
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p>The main impact from the development of this site would be extension of the built form and closing the gap between the built form and countryside.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered to be low. The impact on the landscape could be ameliorated by careful masterplanning to emphasise openness. Height, mass and density of development could be carefully considered and natural features could be used to create a green buffer and to soften or screen views of the built form. A landscape and visual impact assessment LVIA should be carried out.</p> <p><u>Biodiversity</u></p> <p>The site sits in the vicinity of a site of nature conservation importance. It sits adjacent to Epsom Common and there are opportunities for the site to enhance the green corridors and in the area. On the other hand the proximity of development next to the SSSI may be a concern.</p> <p>The site is located within the 'Thames Basin Lowlands' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p>The site promoters have indicated that a sensitive development which will include net gains in biodiversity.</p> <p><u>Access to open space/ countryside</u></p> <p>There is a good Public Rights of Way (PROW) network which could link up the site. The site promoters have suggested an access strategy be developed for the site and opportunity to improve the existing allotments.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

## West Park LAA Reference HOR008



Total Site Area: 1.47  
Assessed Yield: Approximately 150 dwellings (C3)

### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P20	Land at and immediately surrounding West Park former hospital site	1	0	1	2

### Site description

West Park is a former hospital site which has been redeveloped into a largely residential area but where some clinical uses still remain. This site was former hospital known as The Cottage Hospital and car park which is now derelict. The buildings are no longer in use and has the appearance of neglect.

The site levels is generally flat but with some level changes with slopes and steps to the adjoining buildings in the area.

The overall landscape structure to the western end is extensive parkland which transitions to the agricultural fields beyond.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores low against purposes of the GB in terms of sprawl and safeguarding the countryside from encroachment. It scores zero against merging.

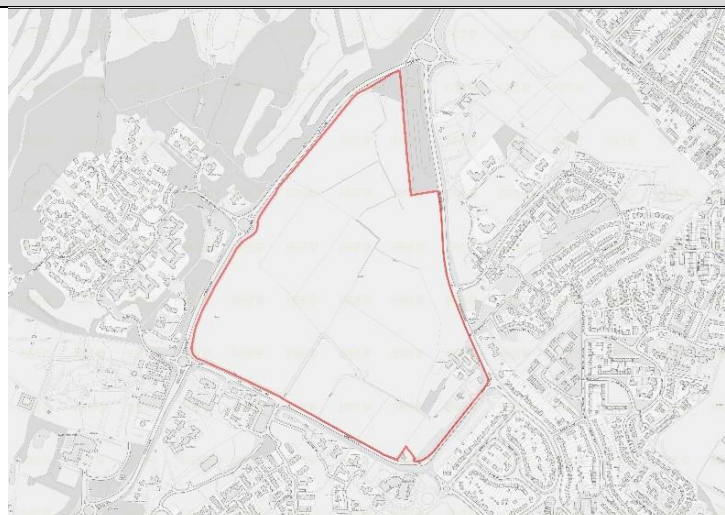
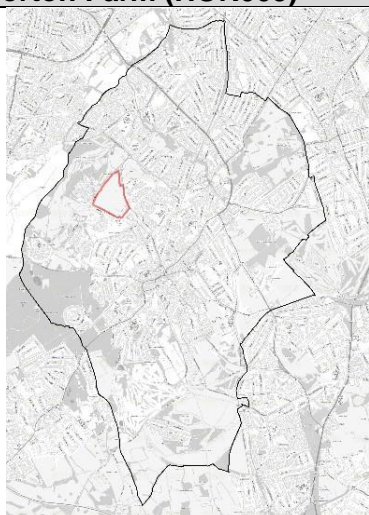
	<p>The site is previously developed are no landscape designations. It is a former hospital cluster and is affected by a Conservation Area.</p> <p>The site is previously developed and has become derelict and no longer in use.</p> <p><u>Defensible Boundaries</u></p> <p>The former hospital clusters are now largely urbanised housing estates that currently remain washed over by the Green Belt. The area of West Park has been assessed for 'openness' and for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.</p>
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p><u>Redevelopment of underutilised PDL</u></p> <p>Previously developed site within the Green Belt. The redevelopment of the site would result in the efficient use of underutilised PDL site.</p> <p>The impact from the development could be minimised if designed sensitively.</p> <p><u>Derelict land/buildings</u></p> <p>The redevelopment of the site offers the opportunity to make use of a derelict site/building and improve the quality of the environment here.</p> <p><u>Landscape and visual sensitivity</u></p> <p>Whilst the overall parkland landscape is designed and well managed. The landscape sensitivity and visual sensitivity is considered to be low. The site is previously developed.</p> <p>The impact could be ameliorated by careful masterplanning to emphasise openness. Height, mass and density of development could be carefully considered and natural features could be used to soften or screen views of the built form. A landscape and visual impact assessment LVIA should be carried out.</p> <p><u>Biodiversity</u></p> <p>The site sits adjacent to areas of nature conservation and there may be opportunities for the site to enhance the green corridors and in the area.</p> <p><u>Access to open space/ countryside</u></p> <p>There is a good Pubic Rights of Way (PROW) network which could link up the site.</p>
Concluding Assessment of whether there are exceptional	Having weighed up the issues outlined above, the site is previously developed where limited infilling is not considered



circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.

inappropriate development. The site is within the context of a urbanised development which is being considered for insetting due to it's limited contribution to openness, it is therefore considered that this site does exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

### Horton Farm (HOR009)



Total Site Area: 37.9 ha

Developable Area: The northern tip to be used for green infrastructure

Assessed Yield:  
Approximately 1,250 dwellings (C3) including some specialist housing and self build plots, 10 gypsy and traveller pitches, business incubation space, community building and a public park of approximately 7ha in addition to other green and blue infrastructure.



Site promoters concept diagram

Parcel 28 score

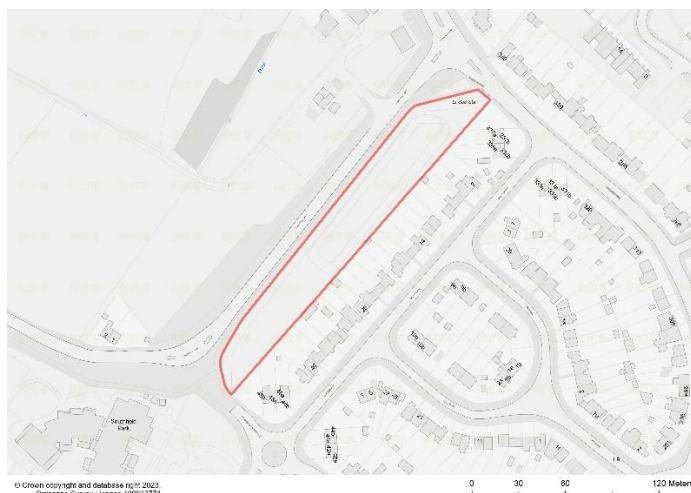
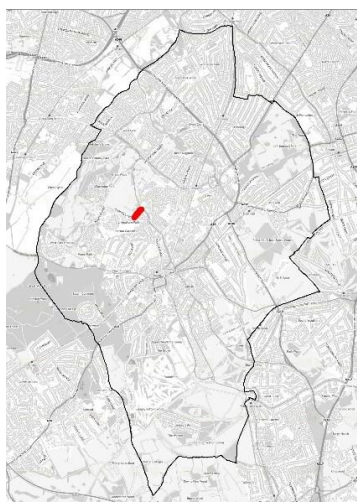
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P28	Land to the north of Chantilly Way east of Horton Lane	3	3	2	8

<p>Site description</p>	<p>The site is mostly open land with some agricultural buildings to the SE corner. There are no landscape designations but the site is large and open with a vegetated edge. The vegetated boundary provide some screening of the site but there is some visibility through some breaks in the vegetation. There are Conservation Areas in all hospital clusters that surround the site, and one directly adjacent the site.</p> <p>The parcel provides a gap between the hospital development clusters. The hospital clusters have been developed around the late 1990s to early 2000s which are located to the north, south-west and north-east of the parcel, effectively surrounding the site.</p> <p>Horton Country Park and Golf Course are located to the north. The character of the land surrounding this parcel is fragmented and substantially influenced by the adjacent residential areas, the hospital cluster sites and associated busy road network.</p>
<p>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</p>	<p>The site scores high against purposes of the Green Belt in terms of sprawl and merging and scores moderately against the purpose of safeguarding the countryside from encroachment. Although, it is important to note that the triangular site is hemmed in by former hospital clusters which are now residential estates set within parkland settings. These former hospital clusters are currently washed over by the Green Belt but are low scoring against the Green Belt purposes. These areas being proposed to be inset from the Green Belt. In this regard, the site would on the face of it be a natural rounding off of the built form here.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p><u>Defensible Boundaries</u></p> <p>The site is surrounded by highways on almost every edge with the Eastern boundary consisting of Hook Road and the locally listed Epsom Cemetery, the Southern boundary consisting of Chantilly Way and the Northern and Western Boundary Horton Lane.</p> <p>The site has well defined robust and durable boundaries on all sides which are also considered capable of forming a new Green Belt boundary in conjunction with the development of Chantilly Way.</p> <p>A initial concept plan of the site shows a potential proposal would result the northern part of the site being retained for open space/green infrastructure. This would retain a green buffer to the north of the site and reflect and become a continuation of the structure of the built form adjoining area.</p> <p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary. However taking into account the adjacent redeveloped hospital clusters which are low scoring green belt parcels being proposed for inseting, the impact is on the face of it is potentially reduced.</p>



	<p>The site boundaries are well defined by roads, and well defined woodland/locally listed cemetery.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered of low sensitivity, as it is not rare in the context of the wider character area, however, it does provide an open green gap and separation between the hospital clusters. However the former hospital clusters have been extensively built out into residential estates and are largely urban in character with some areas on the edge remaining open.</p> <p>The site is surrounded by hospital clusters that all have conservation areas.</p> <p>The impact of any development could be ameliorated by careful masterplanning to take into account the constraints in the location including the vicinity of heritage assets and landscape adjacent maintain a green buffer/s or wedge/s, which continues to emphasise openness particularly to the north where there is no adjacent built form. A landscape and visual impact assessment LVIA should be carried out.</p> <p><u>Biodiversity</u></p> <p>The site sits adjacent to areas of nature conservation interest/importance and there are opportunities for the site to connect to and enhance the green corridors and in the area.</p> <p><u>Access to open space/ countryside</u></p> <p>There are no Public Rights of Way (PROW) or networks of local footpaths within this parcel of land, therefore access is currently restricted. There is a private bridleway.</p> <p>New public open space proposed as part of the site could improve public accessibility to open space and improve connectivity through the site between the existing urban area to the east and Horton Country Park to the west.</p>
<p>Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.</p>	<p>Having weighed up the issues outlined above the redevelopment of the site would contribute significantly to the housing need within the Borough and help meet over half the accommodation needs for the gypsy and traveller community.</p> <p>Additional benefits include business incubation space, community building and a public park of approximately 7ha in addition to other green and blue infrastructure. On balance it is considered that this site does exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p>

## Land at Chantilly Way HOR010



Total Site Area: 0.7 ha  
Assessed Yield: 30 residential units

### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P29	Land to the east of Chantilly Way	2	0	0	2

### Site description

The site is a narrow undeveloped paddock that is heavily influenced by Chantilly Way and the settlement edge of Epsom to the south east. Residential properties along Brettgrave lies parallel and overlook the site.

The site forms a basin-like depression.

This parcel is severed from the wider landscape NW and has a stronger relationship with the urban landscape SE.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

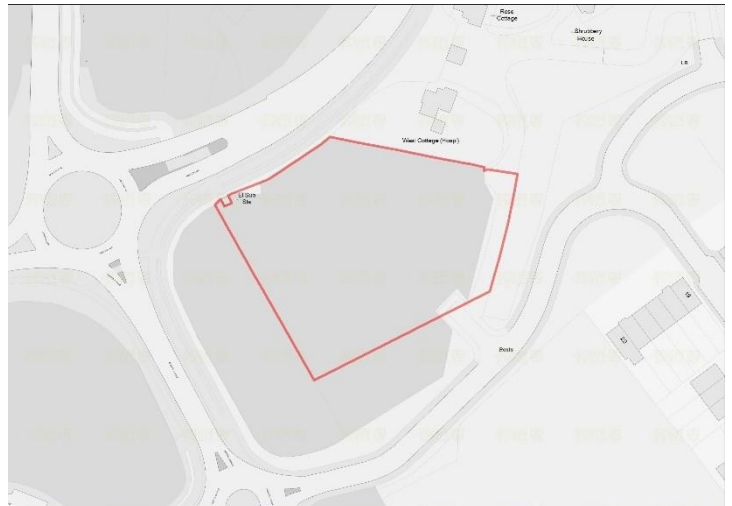
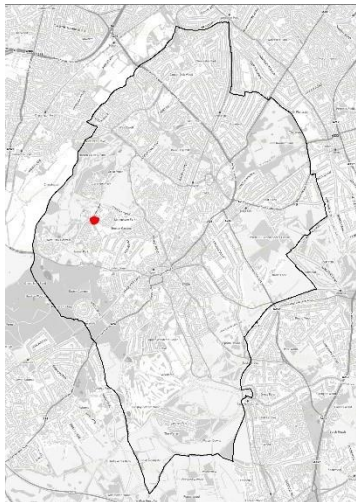
The site scores moderate against purposes of the GB in terms of sprawl. It scores zero for merging and against the purpose of safeguarding the countryside from encroachment.

There are no landscape designations and the site has an scrubby, unmanaged appearance.

Defensible Boundaries

	<p>The site has clear boundaries along Chantilly Way and the rear of properties along Brettgrave.</p> <p>The parcel has well defined robust and durable boundaries.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p><u>Landscape and Visual sensitivity</u></p> <p>The landscape and visual sensitivity is considered to be low sensitivity. The appearance of the area could be improved by careful masterplanning that uses green features to soften and screen views here.</p> <p><u>Biodiversity</u></p> <p>Opportunity to add green features that could enhance biodiversity, although probably limited.</p>
<p>Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.</p>	<p>Having weighed up the issues outlined above, it is considered that this site does exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p>

#### Land south of West Cottage, Livingstone Park HOR011



Total Site Area: 0.5 ha  
Assessed Yield; 10 residential units

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P25	Land at The Manor former hospital site	0	0	1	1

Site description

The site of a former house/property with significant tree coverage(some protected by TPO) and overgrown and boarded up access from Horton Crescent. It sits at a prominent corner between Horton Lane and Abbos Avenue. The site is well screened.

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores low against purposes of the GB in terms safeguarding the countryside from encroachment. It scores zero against merging and sprawl.  
The site sits within a landscape that is intensively managed.

The surrounding area is mainly residential, former hospital site set within a highly managed parkland setting and is within a conservation area. There are no landscape designations.

Defensible Boundaries

The site boundary does not follow any existing physical features, therefore it is weak and or would be vulnerable to further changes.

It is also awkwardly shaped which leaves it vulnerable to further infill of adjacent parcels. The site is small, therefore there is limited benefit from the quantum of development and it's impact openness.

There would be limited opportunity for development without impacting the existing considered layout and landscape setting.

Livingstone Park is washed over by the green belt and has been assessed for potential insetting in Section 2 and the proposed area for potential future development fall outside the proposed boundary for insetting.

To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))

Landscape and visual sensitivity

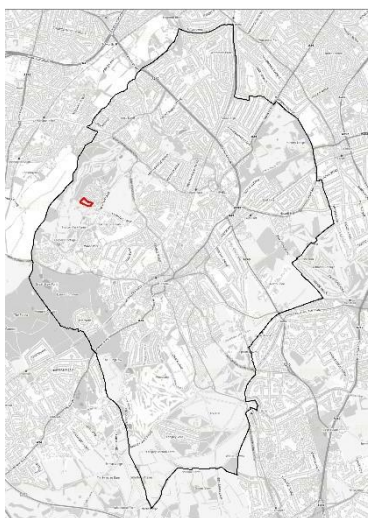
The landscape sensitivity is considered to be low and visual sensitivity is of moderate sensitivity set within a conservation area.

The impact could be ameliorated by careful masterplanning.

However the site is small and sits within a highly managed parkland setting and it is considered there is limited

	<p>opportunity for development without impacting the existing considered layout and landscape setting.</p> <p><u>Biodiversity</u></p> <p>Small site to really achieve any notable improvements to biodiversity if developed.</p> <p><u>Access to open space/ countryside</u></p> <p>There is a good Public Rights of Way (PROW) network and public open space in the area at present.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

### Clarendon Park HOR012



Total Site Area: 1.96 ha  
Assessed Yield: 40 residential units

#### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P27	Land at Clarendon Park (Long Grove former hospital site)	0	0	1	1

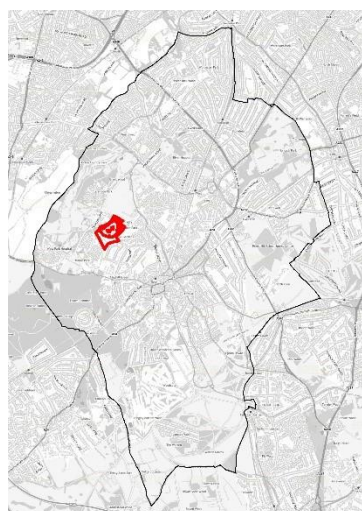



<p>Site description</p>	<p>The site is open space associated with residential development to the north as part of Clarendon Park. Clarendon Park is a residential development set within a former hospital and parkland landscape.</p> <p>The open space is a well managed parkland used for recreation by nearby residents. A dense tree belt running along the southern boundary is also designated as an SNCI.</p>
<p>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</p>	<p>The site scores low against purposes of the GB in terms safeguarding the countryside from encroachment. It scores zero against merging and sprawl.</p> <p>There are no landscape designations. However the site sits within a highly managed parkland setting and is adjacent a conservation area</p> <p><u>Defensible Boundaries</u></p> <p>Follows clear physical features and property lines.</p> <p>There would be limited opportunity for development without impacting the existing considered layout and landscape setting.</p> <p>Clarendon Park is washed over by the green belt and has been assessed for potential inseting in Section 2 and the proposed area for potential future development fall outside the proposed boundary for inseting.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p><u>Landscape and visual sensitivity</u></p> <p>The impact could be ameliorated by careful masterplanning. However, the landscape is of moderate sensitivity set within managed parkland setting adjacent to a conservation area. It is considered there is limited opportunity for development without impacting the existing considered layout and landscape and ecological setting.</p> <p><u>Biodiversity</u></p> <p>Part of the site is located within the 'Thames Basin Lowlands' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p>



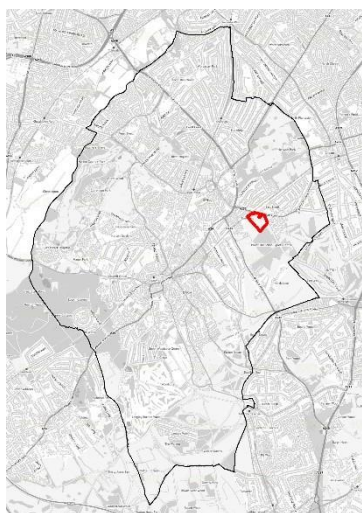
	<p>The southern part of the site is designated SNCI which leads onto to a larger area of SNCI. This should be safeguarded with sufficient buffer.</p> <p><u>Access to open space/ countryside</u></p> <p>There is a good Public Rights of Way (PROW) network and public open space in the area at present</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

### Horton Hospital, Livingstone Park HOR014

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<p>Total Site Area: 10.58 ha</p> <p>Assessed Yield: Housing, older persons accommodation</p>													
<p>Stage 1 score</p> <table><tr><th>Parcel ID</th><th>Site Description</th><th>Purpose score 1</th><th>Purpose score 2</th><th>Purpose score 3</th><th>Overall Score</th></tr><tr><td>P25</td><td>Land at The Manor former hospital site</td><td>0</td><td>0</td><td>1</td><td>1</td></tr></table>		Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score	P25	Land at The Manor former hospital site	0	0	1	1
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score								
P25	Land at The Manor former hospital site	0	0	1	1								
Site description	<p>Various parcels of amenity green space surrounding Livingstone Park. Livingstone Park is washed over by the green belt. Livingstone Park is a residential development set within a former hospital and parkland landscape.</p>												

<p>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</p>	<p>The site scores low against purposes of the GB in terms safeguarding the countryside from encroachment. It scores zero against merging and sprawl.</p> <p>There are no landscape designations. However the site sits within a highly managed parkland setting with distant views towards Epsom Downs.</p> <p><u>Defensible Boundaries</u></p> <p>This site follows the physical boundary although is an awkwardly shaped parcel that wraps around the residential core. There would be limited opportunity for development without impacting the existing considered layout and landscape setting.</p> <p>The area of Livingstone Park has been assessed for potential insetting in Section 2 and the proposed areas for potential future development fall outside the proposed boundary for insetting.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p><u>Landscape and visual sensitivity</u></p> <p>The landscape is of moderate sensitivity, with the northern part of the site within a conservation area.</p> <p>The impact could be ameliorated by careful masterplanning to emphasise openness. Height, mass and density of development could be carefully considered and natural features could be used to create a green buffer and to soften or screen views of the built form.</p> <p>However the site sits within a highly managed parkland setting and it is considered there is limited opportunity for development without impacting the existing considered layout and landscape and ecological setting.</p> <p><u>Biodiversity</u></p> <p>Most of the site semi natural in character and is designated SNCI. These should be safeguarded with sufficient buffer.</p> <p><u>Access to open space/ countryside</u></p> <p>There is a good Public Rights of Way (PROW) network and public open space in the area at present.</p>
<p>Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.</p>	<p>Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p>

## Land at Priest Hill NON013



Total Site Area:  
8.63.ha

Assessed Yield:  
250-350 residential units



LAND AT PRIEST HILL, EPSOM

ILLUSTRATIVE MASTERPLAN INCLUDING POTENTIAL GROWTH AREA

### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P43	Land to the east of NESLOT College	3	3	2	8

### Site description

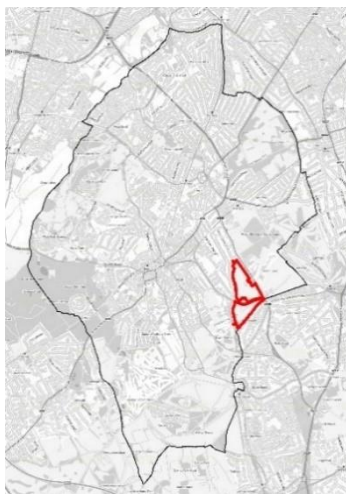
The site is open space within a largely urbanised context adjacent to busy roads and railway lines. The site adjoins the settlement edge of Ewell East and includes shallow, north facing slopes. The land consists of recreational facilities and playing fields, hard surfacing (former tennis courts), derelict buildings on the middle parcel, next to Ewell East Station.


	<p>The site borders the railway line, Cheam Road (the A232) and Banstead Road, with public rights of way to the, north (parallel to the railway line) west (along the edge of Nescot College) and south of the site where Priest Hill Nature Reserve is located. The Nature Reserve is also an SNCI.</p> <p>Vegetation follow the fence line of the footpaths. Glimpses into the site visible from the breaks in the vegetation.</p> <p>The site is adjacent to built development on the north (Cheam Road) and east (Banstead Road). Although there are notable level changes between the site and Cheam Road.</p>
What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))	<p>The site scores high against purposes of the GB in terms of sprawl and merging and scores moderately against the purpose safeguarding the countryside from encroachment.</p> <p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary and the reduction of a gap between built up areas.</p> <p>There are no landscape designations and parts of the site are previously developed land (former pavillion) and hardstanding to the north. These and the urban influences of the surrounding area limits any characterisation of it being open countryside.</p> <p><u>Defensible Boundaries</u></p> <p>The site has clear defensible boundaries, public right of way to the SW, railway line to the NW, public highway the north and east. However, the site is an awkward shape and may make it vulnerable to further infill of adjacent parcels.</p> <p>The NESLOT campus is washed over by the Green Belt but has been considered for inseting in section 2 of the GB Study update 2024.</p>
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary and reducing the gap between built up areas. To reduce the impact development could be focussed to the northern portion along Cheam Road and Banstead Road, this is where the existing urbanised features are and the continuation of built form here may be less intrusive, particularly where combined with green features to soften the views.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape and visual sensitivity considered to be low sensitivity as there are parts of the site that have urbanising features and the adjacent area is urban. The impact on the landscape could be ameliorated by careful masterplanning to maintain a green buffer/s or wedge/s to emphasise openness</p>



	<p>particularly to the south. Height, mass and density of development could be carefully considered and natural features could be used to soften or screen views of the built form. A LVIA should be carried out to ensure minimising the impact.</p> <p><u>Biodiversity</u></p> <p>The site is adjacent to Priest Hill Nature Reserve to the south and is located within the 'North Downs' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their, connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p><u>Access to open space/ countryside</u></p> <p>Redevelopment of the site would result in the loss of a outdoor leisure facility which would need to be justified and replace/re provided on site or elsewhere.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

#### Downs Farm (LAA reference NON016 and NON042)



<p>Total Site Area:</p> <p>27.97ha NON016 (north)</p> <p>17.92 ha NON042 (south)</p> <p>Developable Area:</p> <p>Northern parcel, GI on southern parcel</p> <p>Assessed Yield:</p> <p>675 residential units, park, school and employment</p>													
<p>Stage 1 score</p> <table><tr><th>Parcel ID</th><th>Site Description</th><th>Purpose score 1</th><th>Purpose score 2</th><th>Purpose score 3</th><th>Overall Score</th></tr><tr><td>P32</td><td>Land to the west of Burgh Heath Road east of Rifle Butts Alley</td><td>3</td><td>2</td><td>2</td><td>7</td></tr></table>		Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score	P32	Land to the west of Burgh Heath Road east of Rifle Butts Alley	3	2	2	7
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score								
P32	Land to the west of Burgh Heath Road east of Rifle Butts Alley	3	2	2	7								
<p>Site description</p>	<p>The site comprises paddocks, pasture, farmland with some light Industrial use and small business units. The site is contained by existing residential development and possesses north facing slopes.</p> <p>The site forms part of the gap between the Epsom and residential areas of Nork, adjacent to the Epsom Downs Station.</p> <p>The site has an undulating landform. Views are possible across the site to the nearest settlement edges.</p> <p>The western boundary and most of the eastern boundary abuts residential ribbon development.</p>												
<p>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</p>	<p>The site scores high against purposes of the GB in terms of sprawl. The site scores moderately against the purpose of merging and safeguarding the countryside from encroachment. The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary.</p>												



	<p>There are no landscape designations and parts of the site are previously developed in employment use. The parcels are partly enclosed or adjacent to ribbon development of detached along Reigate Road and Longown Lane North and South, these urban influences limit the openness of the parcel. However the contours and vicinity to conservation area increases the visual sensitivity of the site.</p> <p><u>Defensible Boundaries</u></p> <p>The site is defined by clear physical features including property boundaries and highways/ road boundaries. The southern parcel would comprise of new paths and would not require changes to the Green Belt.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p>The high score for sprawl and moderate score for merging could be ameliorated by limiting the area of built form to the northern parcel. The site promoters are proposing built development be restricted to the northern part of the northern parcel with the southern part of the parcel consisting of new and enhanced green infrastructure. The southern parcel is being proposed for enhanced new paths and</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape is of low sensitivity, as it contains some PDL land and is surrounded by houses and urbanising features, the landscape in the area is not rare in the context of the wider character area, however, it does provide an open green gap and some separation between Epsom and Nork.</p> <p>Any negative impact could be ameliorated by careful masterplanning to maintain a green buffer/s or wedge/s to emphasise openness particularly to the south where it moves away from the main built form of Epsom.</p> <p>The site contours are quite steeply sloping and the parcel to the north is adjacent the conservation area. The steep contours in the area may limit any effective mitigation measures, where development will be prominent in the landscape. LVIA should be carried out to ensure minimising the impact.</p> <p><u>Biodiversity</u></p> <p>The site sits in the vicinity of a site of nature conservation importance.</p> <p>The site is located within the 'North Downs' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the</p>

	<p>development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p><u>Access to open space/ countryside</u></p> <p>There is potential for new open space provision to the southern part of the site.</p> <p>New pedestrian footpaths in the southern parcel increases access to the countryside and potentially to public transport – Epsom Downs Railway Station to the south.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

#### Drift Bridge Farm (LAA reference NON021)

Total Site Area: 24.2 ha

Assessed Yield: 500 residential units

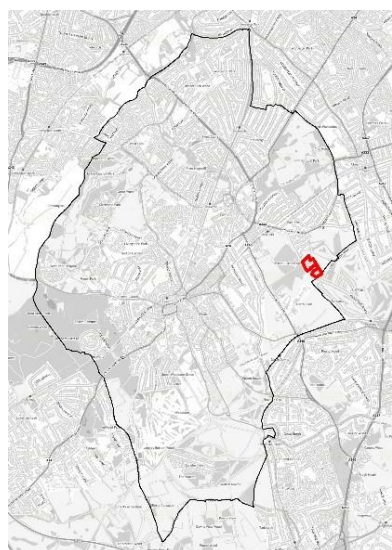
Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
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P38	Land to the east of Reigate Road north of railway line at North Looe	3	2	3	8	
Site description		The site is a currently in agricultural uses, with a number of varying sized fields, which rise to the south. Agricultural buildings and a dwelling are grouped near the entranced of the site. Access to the site is restricted to the west from Reigate Road (the A240), which is narrow and heavily vegetated with restricted views.				
What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))		<p>The site scores high against purposes of the GB in terms of sprawl and safeguarding the countryside from encroachment. The site scores moderately against the purpose of merging</p> <p>There are no landscape designations and parts of the site are previously developed to the west. Access to the site via Reigate Road and a railway line forms the southern boundary.</p> <p><u>Defensible Boundaries</u></p> <p>The site is defined by clear physical features including field boundary, property boundaries and railway line to the south. However, extending north from Nork extends the settlement boundary beyond the railway line- which is a strong enduring boundary, replaced by a weaker boundary (field boundary), leaving the area between settlements vulnerable to further infilling. Increasing the chances of creep from the south</p>				
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))		<p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary and impact on the countryside and to some extent merging.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape sensitivity is considered of low sensitivity and visual sensitivity moderate. There are urbanising features surrounding it and therefore impact on the countryside character already exists. This could be reduced by careful masterplanning, the use of lower densities and incorporation of open space and using green features to soften views.</p> <p><u>Biodiversity</u></p> <p>The site does not have any particular ecological designation. Although the site is located within the 'North Downs' Biodiversity Opportunity Area. BOAs are identified as locations</p>				

	where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.

### Banstead Road NON038



Total Site Area: 5.98.ha  
Assessed Yield: 50-80 residential units

#### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P45	Land at DW Fitness Banstead Road	3	3	1	7

#### Site description

The site surrounds a private gym located in isolation along Banstead Road. The site has a vegetated edge and is well screened from the road. Banstead Road has an urbanised

	<p>character with development to the north and to the south, the site provides a green wedge between Ewell and moving towards Banstead.</p> <p>Adjacent to nature conservation sites to the north and west.</p>
<p>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</p>	<p>The site scores high against purposes of the GB in terms of sprawl and merging and scores low against the purpose safeguarding the countryside from encroachment.</p> <p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary and the reduction of a gap between built up areas. The site moves away from the settlement edge and its urban influences and does to some extent possess the characteristics of it being open countryside but is connected to ribbon development to the north and south.</p> <p>There are no landscape designations and the site cloaks around previously developed land. The PDL is excluded from the site which is a private gym.</p> <p><u>Defensible Boundaries</u></p> <p>The site follows physical boundaries of the field. However, there is a gap between the existing built up edge and the site. The site is also an awkward shape and may make it vulnerable to change in the long term.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p>The main impact from the development of this site would be extension of the built form beyond the existing settlement boundary and reducing the gap between built up areas. Redevelopment of the site would effectively marry up the built development to the north and to the south, removing the gap entirely. Alternatively, if development were to be focussed in one cluster then it would still protrude awkwardly making the boundary vulnerable in the long term.</p> <p><u>Landscape and visual sensitivity</u></p> <p>The landscape is of low sensitivity. Open fields with limited views from Banstead Road. The landscape is not particularly unique and parts of it appear neglected in appearance and with urbanising features adjacent.</p> <p>The impact on the landscape could be ameliorated by careful masterplanning and height, mass and density of development could be carefully considered and natural features could be used to soften or screen views of the built form. A LVIA should be carried out to ensure minimising the impact.</p> <p><u>Biodiversity</u></p>









Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P52	Land to the east of Reigate Road	0	0	1	1

Site description	The site existing commercial uses accessed along narrow track. The site is self contained and has little impact on the wider landscape
What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))	<p>The site scores zero against purposes of the GB in terms of sprawl and merging and scores low against the purpose safeguarding the countryside from encroachment.</p> <p>The impact from the development of this site is zero or low all Green Belt purposes. The site is a small PDL in the Green Belt. It is accessed off a narrow single lane track from the Reigate Road.</p> <p><u>Defensible Boundaries</u></p> <p>The site follows clear physical boundaries of the property. Small, awkward shape site that would leave it vulnerable to future changes.</p> <p>In addition, the site is a small PDL site where limited infilling and partial or complete redevelopment is not considered inappropriate if it does not impact openness of the Green Belt.</p>
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p>The impact of the site is considered to be low and therefore harm to the GB from the development would be limited.</p> <p>The landscape is of low sensitivity. It is a self contained PDL site embedded in a small area of built development washed over by the Green Belt. Any impact on the landscape could be ameliorated by careful masterplanning and height, mass and density of development could be carefully considered and natural features could be used to soften or screen views of the built form. A LVIA could be carried out to ensure minimising the impact.</p>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	<p>The site is small, PDL site that can be carefully redeveloped without the need to change the Green Belt boundary.</p> <p>Having weighed up the issues outlined above, it is considered that this site does not exhibit Exceptional Circumstances justifying an amendment to the Green Belt boundary.</p>

## Insetting

Insetting West Park						
						
Total Site Area: 34.95 ha Proposed inset Area 25.6 ha						
Stage 1 score						
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score	
P20	Land at and immediately surrounding West Park former hospital site	1	0	1	2	
What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))		The area scores low against purposes of the GB in terms of sprawl and safeguarding the countryside from encroachment. It scores zero against merging.  The area is a former hospital and is previously developed within a parkland setting. There are no particular landscape designations. The surrounding landscape is within an area of rolling clay farm lands, with Epsom Common and woodlands to the south  A large part of the site is affected by Conservation Area.				

	<p><u>Defensible Boundaries</u></p> <p>The former hospital clusters are previously developed housing estates that currently remain washed over by the Green Belt. The area of West Park has been assessed for 'openness' and for potential inseting in Section 2 of the GB Study 2024. The proposed area for inseting would follow tightly the built up limits of the parcel.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p>The individual scores for the GB purposes and overall score for the parcel is low and therefore it is not considered that there would be significant consequent impact as a result of inseting.</p> <p>The site boundaries are well defined vegetation and clear property boundaries.</p> <p><u>Derelict land/buildings</u></p> <p>The area is largely previously developed and there are sites being put forward for future development. These sites consist of buldings that have become derelict and no longer in use. The impact on openness will be limited and will depend on the development proposed.</p> <p>The redevelopment of the site offers the opportunity to make use of a derelict site/building and improve the quality of the environment here.</p> <p>It is also important to note that reuse of buildings, limited infilling or patial or complete redevelopment is not considered inappropriate development in the Green Belt provided that there is no greater impact or harm to the openness of the Green Belt</p> <p><u>Landscape</u></p> <p>There are no landscape designations and most of the area is previously developed. In the absents of the GB designation, the area will be on the edge of settlement, and the impact from any proposed development could be ameliorated by way of it where careful masterplanning to emphasise openness. An LVIA should be required.</p> <p>The height, mass and density of development could be carefully considered and natural features could be used to soften or screen views of the built form.</p>

	<p><b><u>Biodiversity</u></b></p> <p>The site sits adjacent to areas of nature conservation and there may be opportunities for the site to enhance the green corridors in the area.</p> <p><b><u>Designations</u></b></p> <p>The character of the MDS would be protected by other existing designations</p> <ul style="list-style-type: none"> <li>• TPOs</li> <li>• Contaminated land</li> <li>• Archeological importance</li> <li>• West Park Conservation Area</li> <li>• Listed Buildings</li> <li>• Adjacent SSSI</li> </ul>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that the major developed site does not exhibit an open character that makes an important contribution to the Green Belt and should therefore be excluded from the Green Belt Boundary.

### Insetting NESCOT

	
<p>Total Site Area: 14.36 ha</p> <p>Proposed Inset Area: 10.08</p>	

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P42	Land at and associated with NESCOL College	1	3	1	5

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores high against purposes of the GB in terms of merging and scores low against the purpose of sprawl and safeguarding the countryside from encroachment.

The main impact of inseting of this site would be the reduction of a gap between built up areas.

There are no landscape designations and approximately half the site comprises of previously developed land in educational use.

Defensible Boundaries

The site has clear defensible boundaries, public right of way to the south, railway line to the north, public highway to the west and field boundary to the east.

The proposed area for inseting would follow tightly the built up elements of the campus to the north., where the southern boundary would follow the line of the property edge parallel to the extensive surface car park to the south.

To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))

The individual scores for the GB purposes is high with respect to merging.

The proposed area for inseting would follow tightly the built up areas of the site, the agricultural field to the south is proposed to remain in the Green Belt.

Landscape

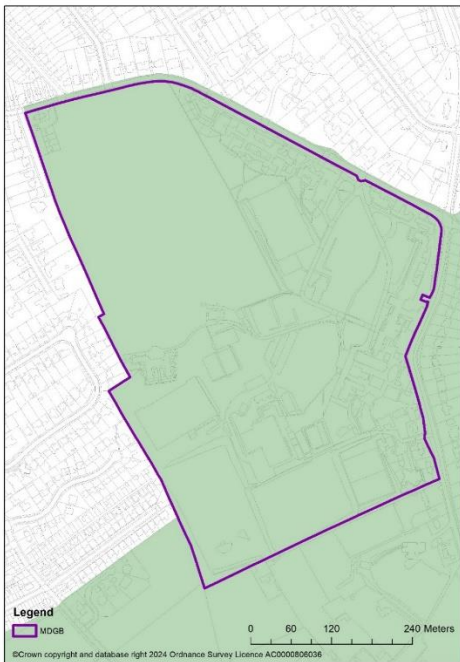

The landscape is of low sensitivity and most of the site to the north is previously developed. In this regard, It is important to note that reuse of buildings, limited infilling or partial or complete redevelopment is not considered inappropriate development in the Green Belt provided that there is no greater impact or harm to the openness of the Green Belt

	<p>Without a Green Belt designation, the area will be on the edge of settlement, and the impact from any proposed development could be ameliorated by way of it where careful masterplanning. An LVIA should be required.</p> <p>Proposals should consider carefully height, mass and density of development and the use of natural features to soften or screen views of the built form.</p> <p><b><u>Biodiversity</u></b></p> <p>The site is adjacent to Priest Hill Nature Reserve to the south and is located within the 'North Downs' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, any future development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p><b><u>Designations</u></b></p> <p>The character of the MDS would be protected by other existing designations</p> <ul style="list-style-type: none"> <li>• Contaminated land</li> <li>• Archeological Site</li> <li>• Adjacent BOA</li> <li>• Adjacent SNCI.</li> </ul>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that the major developed site does not exhibit an open character that makes an important contribution to the Green Belt and should therefore be excluded from the Green Belt Boundary.

#### Epsom College Insetting

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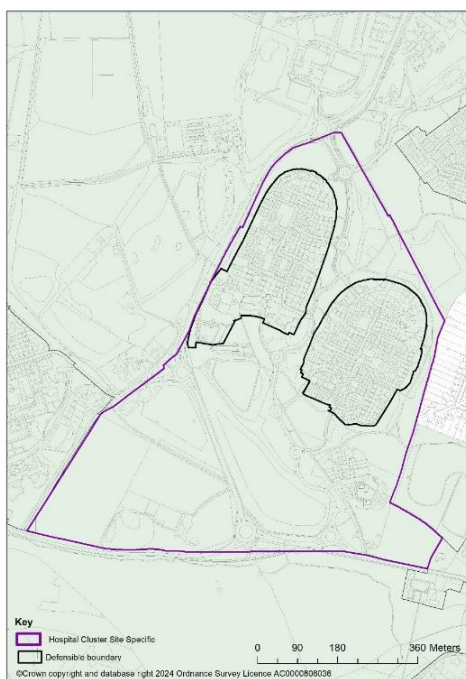
													
<p>Total Site Area: 30.39 ha Proposed inset Area 30.39 ha</p>													
<p>Stage 1 score</p> <table><tr><th>Parcel ID</th><th>Site Description</th><th>Purpose score 1</th><th>Purpose score 2</th><th>Purpose score 3</th><th>Overall Score</th></tr><tr><td>P36</td><td>Land at Epsom College</td><td>1</td><td>2</td><td>1</td><td>4</td></tr></table>		Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score	P36	Land at Epsom College	1	2	1	4
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score								
P36	Land at Epsom College	1	2	1	4								
<p>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</p>	<p>The site scores moderate against purposes of the GB for merging and low in terms of sprawl and safeguarding the countryside from encroachment. The main impact of insetting of this site would be the reduction of a gap between built up areas.</p> <p>The area is a private college campus comprising of buildings and open space.</p> <p>.</p> <p>There are no landscape designations but the site contains listed buildings and have distant views to the south</p> <p><u>Defensible Boundaries</u></p> <p>The site is defined by clear physical features following the property line of the campus.</p>												

<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p>The individual scores for the GB purposes is moderate with respect to merging.</p> <p>The proposed area for inseting would follow tightly the property line.</p> <p><u>Landscape</u></p> <p>The are no landscape designation but the site is adjacent conservation area and contains listed buildings.</p> <p>Whilst washed over by the Green Belt. It is important to note that reuse of buildings, limited infilling or patial or complete redevelopment is not considered inappropriate development in the Green Belt provided that there is no greater impact or harm to the openness on the Green Belt</p> <p>Without a Green Belt designation, the area will be on the edge of settlement, and the impact from any proposed development could be ameliorated by way of it where careful masterplanning. An LVIA should be required where development may impact on the character of the site and wider landscape or impact on important views.</p> <p>Proposals should consider carefully height, mass and volume of development and the use of natural features to soften or screen views of the built form.</p> <p><u>Biodiversity</u></p> <p>The site does not have any ecological designations but it is adjacent to the 'North Downs' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, any future development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how</p> <p>The high score for sprawl and moderate score for merging could ameliorated by limiting the area of built form to the northern parcel. The site promoters are proposing built development be restricted to the northern part of the northern parcel with the southern part of the parcel</p>
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	<p>consisting of new and enhanced green infrastructure. The southern parcel is being proposed for enhanced new paths and</p> <p><u>Landscape</u></p> <p>The landscape is of low sensitivity, as it contains some PDL land and is surrounded by houses and urbanising features, the landscape in the area is not rare in the context of the wider character area, however, it does provide an open green gap and some separation between Epsom and Nork.</p> <p>Any negative impact could be ameliorated by careful masterplanning to maintain a green buffer/s or wedge/s to emphasise openness particularly to the south where it moves away from the main built form of Epsom.</p> <p>The site contours are quite steeply sloping and the parcel to the north is adjacent the conservation area. The steep contours in the area may limit any effective mitigation measures, where development will be prominent in the landscape. LVIA should be carried out to ensure minimising the impact.</p> <p><u>Biodiversity</u></p> <p>The site sits in the vicinity of a site of nature conservation importance.</p> <p>The site is located within the 'North Downs' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p><u>Access to open space/ countryside</u></p> <p>The site is private and the facilities are not accessible to the general public.</p> <p><u>Designations</u></p> <p>The character of the MDS would be protected by other existing designations</p>
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	<ul style="list-style-type: none"> <li>• Contaminated land</li> <li>• Listed buildings</li> <li>• Locally listed buildings</li> <li>• Adjacent to College Road Conservation Area</li> <li>• Adjacent to Burgh Heath Road Conservation Area</li> <li>• TPOs</li> </ul>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that the major developed site does not exhibit an open character that makes an important contribution to the Green Belt and should therefore be excluded from the Green Belt Boundary.

### Insetting Manor Park



Total Site Area: 59.14 ha  
Proposed Inset Area: 13.71

### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P22	Land at and immediately surrounding Horton former hospital site	0	0	1	1

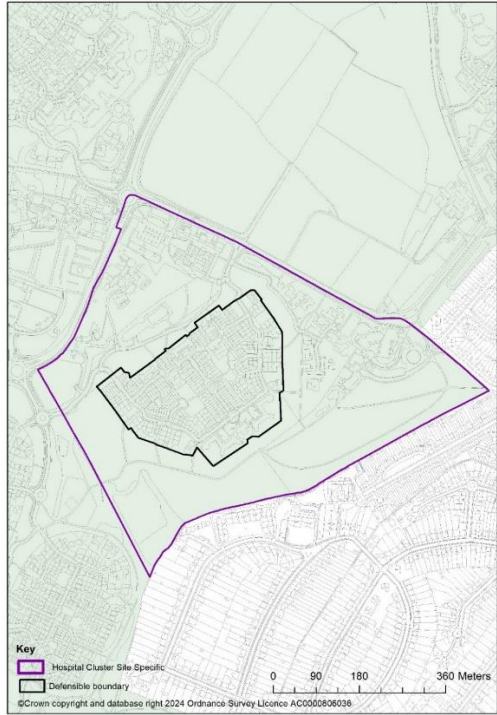
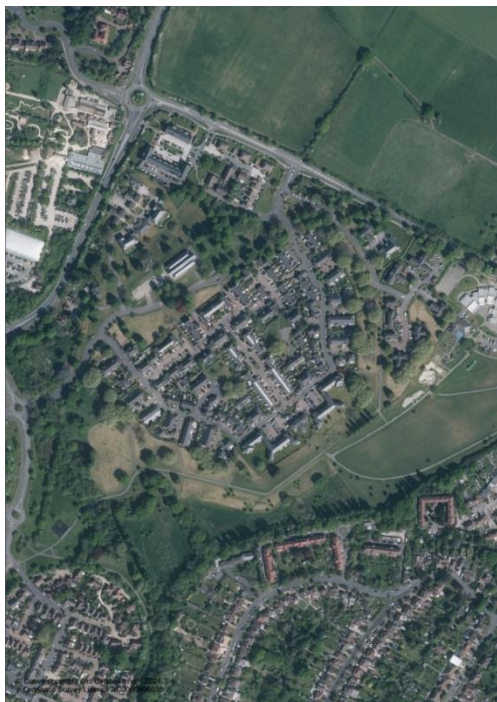
What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))	<p>The site scores low against purposes of the GB in terms safeguarding the countryside from encroachment. It scores zero against merging and sprawl.</p> <p>There are no landscape designations, however the southern part of the site is within a conservation area.</p> <p><u>Defensible Boundaries</u></p> <p>The site comprises of two main developed parcels the east and west.</p> <p>The proposed area for inseting would follow tightly the built up elements.</p>
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p>The main impact from the development of this site would encroachment into the countryside, although the score for this purpose is also low.</p> <p><u>Landscape</u></p> <p>There are no landscape designation but the southern part of the site is within a conservation area and the northern part of the site is adjacent SNCI.</p> <p>Whilst washed over by the Green Belt. It is important to note that reuse of buildings, limited infilling or partial or complete redevelopment is not considered inappropriate development in the Green Belt provided that there is no greater impact or harm to the openness on the Green Belt</p> <p>Without a Green Belt designation, the area will be on the edge of settlement, and the impact from any proposed development could be ameliorated by way of careful masterplanning. An LVIA should be required where development may impact on the character of the site and wider landscape or impact on important views.</p> <p>Proposals should consider carefully height, mass and density of development and the use of natural</p>



	<p>features to soften or screen views of the built form.</p> <p><u>Biodiversity</u></p> <p>The site is located adjacent to the 'Thames Basin Lowlands' Biodiversity Opportunity Area. BOAs are identified as locations where targeted habitat conservation and enhancement should be focussed to achieve greatest benefits. In this regard, the development of this site would require careful consideration on whether the proposal would affect any existing habitats and species in the BOA or their connectivity and how these can (or cannot) be mitigated and enhanced.</p> <p><u>Designations</u></p> <p>The character of the MDS would be protected by other existing designations</p> <ul style="list-style-type: none"> <li>• Contaminated land</li> <li>• Site of Archeological importance</li> <li>• Manor Conservation Area</li> <li>• West Park Conservation Area</li> <li>• TPOs</li> <li>• SNCI</li> </ul>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.	Having weighed up the issues outlined above, it is considered that the major developed site does not exhibit an open character that makes an important contribution to the Green Belt and should therefore be excluded from the Green Belt Boundary.

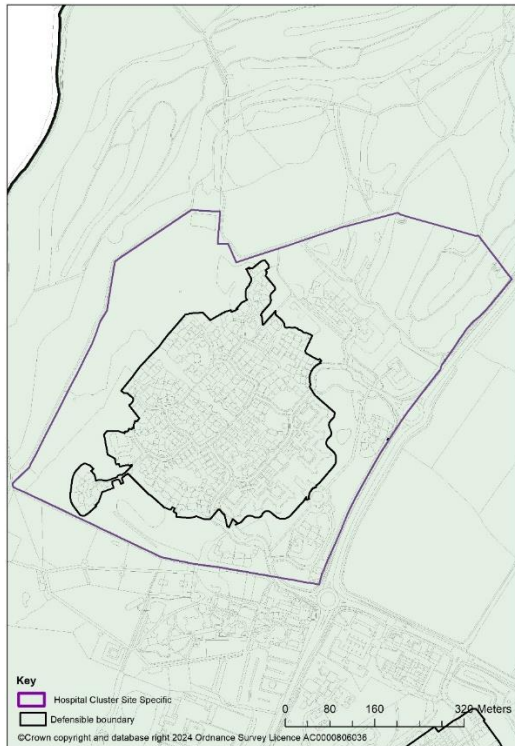
#### Insetting Livingstone Park



													
<div>Total Site Area: 38.92 ha Proposed Inset Area: 14.63 ha</div>													
<div>Stage 1 score</div> <table><tr><th>Parcel ID</th><th>Site Description</th><th>Purpose score 1</th><th>Purpose score 2</th><th>Purpose score 3</th><th>Overall Score</th></tr><tr><td>P25</td><td>Land at The Manor former hospital site</td><td>0</td><td>0</td><td>1</td><td>1</td></tr></table>		Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score	P25	Land at The Manor former hospital site	0	0	1	1
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score								
P25	Land at The Manor former hospital site	0	0	1	1								
<div>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</div>	<div>The site scores low against purposes of the GB in terms safeguarding the countryside from encroachment. It scores zero against merging and sprawl.</div> <div>There are no landscape designations. However the site sits within a highly managed parkland setting with distant views towards Epsom Downs.</div> <div>Defensible Boundaries</div> <div>The proposed area for inseting would follow tightly the built up elements.</div>												
<div>To what extent can the consequent impacts on the purposes of the Green</div>	<div>Landscape</div>												

<p>Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p>There are no landscape designations but the northern part of the site is within a conservation area and listed building. The southern part of the site is adjacent SNCI. The elevated position allows for long views to the south of the Borough.</p> <p>Whilst washed over by the Green Belt. It is important to note that reuse of buildings, limited infilling or partial or complete redevelopment is not considered inappropriate development in the Green Belt provided that there is no greater impact or harm to the openness on the Green Belt</p> <p>Without a Green Belt designation, the area will be on the edge of settlement, and the impact from any proposed development could be ameliorated by way of careful masterplanning. An LVIA should be required where development may impact on the character of the site and wider landscape or impact on important views.</p> <p>Proposals should consider carefully height, mass and density of development and the use of natural features to soften or screen views of the built form.</p> <p><u>Biodiversity</u></p> <p>Most of the surrounding parkland has a semi natural in character and is designated SNCI to the SW.</p> <p><u>Designations</u></p> <p>The character of the MDS would be protected by other existing designations</p> <ul style="list-style-type: none"> <li>• Contaminated land</li> <li>• Setting of listed building</li> <li>• Horton Conservation Area</li> <li>• Open space</li> <li>• TPOs</li> <li>• SNCI</li> </ul>
<p>Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.</p>	<p>Having weighed up the issues outlined above, it is considered that the major developed site does not exhibit an open character that makes an important contribution to the Green Belt and should therefore be excluded from the Green Belt Boundary.</p>

## Insetting Clarendon Park



Total Site Area: 45.09 ha  
Proposed inset Area 12.19 ha

### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P27	Land at Clarendon Park (Long Grove former hospital site)	0	0	1	1

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores low against purposes of the GB in terms safeguarding the countryside from encroachment. It scores zero against merging and sprawl.

There are no landscape designations, however the area consists of a highly managed parkland setting, to SE part of the site is within a conservation area and NW is SNCI and ancient woodland.

Defensible Boundaries

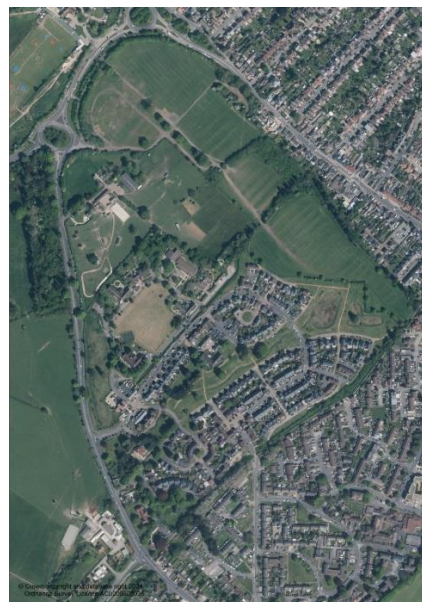
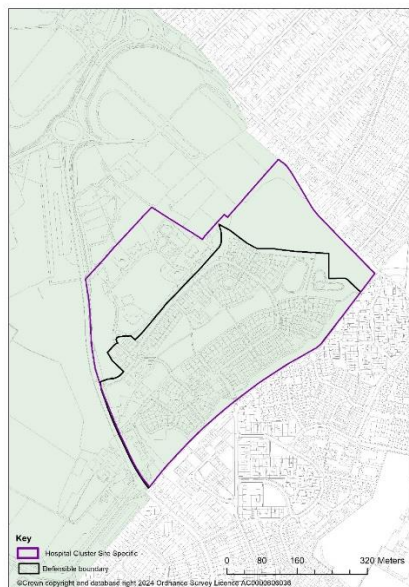
	The proposed area for inseting would follow tightly the built up elements
To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))	<p><u>Landscape</u></p> <p>There are no landscape designations, however the area consists of a highly managed parkland setting, to SE part of the site is within a conservation area and NW is SNCI and ancient woodland.</p> <p>Whilst washed over by the Green Belt. It is important to note that reuse of buildings, limited infilling or partial or complete redevelopment is not considered inappropriate development in the Green Belt provided that there is no greater impact or harm to the openness on the Green Belt</p> <p>Without a Green Belt designation, the area will be on the edge of settlement, and the impact from any proposed development could be ameliorated by way of careful masterplanning. An LVIA should be required where development may impact on the character of the site and wider landscape or impact on important views.</p> <p>Proposals should consider carefully height, mass and density of development and the use of natural features to soften or screen views of the built form.</p> <p><u>Biodiversity</u></p> <p>Most of the surrounding parkland landscape is covered by designated SNCI, LNR, Ancient woodland and TPOs which would protect the area from inappropriate development.</p> <p><u>Designations</u></p> <p>The character of the MDS would be protected by other existing designations</p> <ul style="list-style-type: none"> <li>• Contaminated land</li> <li>• Long Grove Conservation Area</li> <li>• TPOs</li> <li>• Adjacent Horton Country Park LNR</li> <li>• Adjacent Horton Country Park SNCI</li> <li>• Adjacent Ancient woodland</li> </ul>
Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and	Having weighed up the issues outlined above, it is considered that the major developed site does not exhibit an open character that



justify the release of the site from the Green Belt.

makes an important contribution to the Green Belt and should therefore be excluded from the Green Belt Boundary.

### Insetting St Ebbas



Total Site Area: 26.19 ha  
Proposed inset Area 16.14 ha

### Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P31	Land to the north west of St Ebba's former hospital site	2	3	2	7

What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))

The site scores high against the purposes of the GB in terms of merging. It scores moderate in terms sprawl and safeguarding the countryside from encroachment.

There are no landscape designations, however the area consists of a highly managed parkland setting, to NW the site is within a conservation area.

Defensible Boundaries

	<p>The proposed area for inseting would follow tightly the built up elements, excluding the NHS buildings to the NW which will remain in the Green Belt.</p>
<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</p>	<p><u>Landscape</u></p> <p>There are no landscape designations, however the area consists of a highly managed parkland setting, to NW part of the site is within a conservation and adjacent to public open space to the east.</p> <p>Whilst washed over by the Green Belt. It is important to note that reuse of buildings, limited infilling or partial or complete redevelopment is not considered inappropriate development in the Green Belt provided that there is no greater impact or harm to the openness on the Green Belt</p> <p>Without a Green Belt designation, the area will be on the edge of settlement, and the impact from any proposed development could be ameliorated by way of careful masterplanning. An LVIA should be required where development may impact on the character of the site and wider landscape or impact on important views.</p> <p>Proposals should consider carefully height, mass and density of development and the use of natural features to soften or screen views of the built form.</p> <p><u>Designations</u></p> <p>The character of the MDS would be protected by other existing designations</p> <ul style="list-style-type: none"> <li>• Contaminated land</li> <li>• St Ebba's Conservation Area</li> <li>• Open space</li> <li>• TPOs</li> <li>• Setting of statutory listed buildings</li> <li>• Village green</li> </ul>
<p>Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.</p>	<p>Having weighed up the issues outlined above, it is considered that the major developed site does not exhibit an open character that makes an important contribution to the Green Belt and should therefore be excluded from the Green Belt Boundary.</p>



## Anomalies

**001**

**219-225 Chessington Road**



This area is located at the NW edge of the Borough's Green Belt adjacent to Hook Road Arena public open space.

The existing boundary line cuts through the rear gardens of five residential properties and slices through the property at the end.

To correct this anomaly the boundary could wrap around the property boundaries entirely creating a clear boundary line.

The existing boundary as it is creates confusion. The amendment would provide clarity by using a clear physical feature.

The consequent impact is diminimus and would be an improvement, where the boundary would follow a clear physical feature.

**Area:** 0.0463 ha (463 sqm)

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P20	Land at and immediately surrounding West Park former hospital site	1	0	1	2

**What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))**

The area scores low against purposes of the GB in terms of sprawl and safeguarding the countryside from encroachment. It scores zero against merging.

The area comprises of residential properties adjacent Hook Road Arena open space.

The GB boundary in this location is being considered as part of the Site Allocation 34 Hook Road Arena, where the site is being considered for new sports hub to the north and 100 dwellings to the south east.

#### Defensible Boundaries

As it is, the boundary cuts through a number of residential properties. The boundary could be redrawn to follow the edge of the property boundaries delineated by clear physical features rather than cutting through the middle of gardens and one building.

#### **To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))**

The individual scores for the Green Belt purposes and overall score for the parcel is low and the size of the proposed amendment is not considered to lead to significant consequent impact as a result of the minor change.

The site boundaries are well defined vegetation and clear property boundaries.


#### **Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.**

Having weighed up the issues outlined above, it is considered that minor amendment would provide clarity by using a clear physical feature.

The consequent impact is diminimus and would be an improvement.

**002**

**Bramble Walk**

	<p>This area is located to the western side of the Borough’s Green Belt along Bramble Walk.</p> <p>The existing boundary line cuts off the corner verge adjacent to 60b Bramble Walk but includes the verge directly adjacent.</p> <p>The boundary could wrap around the corner verge, providing a clear and clean edge.</p> <p>The amendment would provide clarity by continuing the line to the corner verge rather than an abrupt slicing off the corner.</p> <p>The consequent impact is diminimus and would continue to follow a clear physical feature.</p>												
Area 0.0127 ha (127 sqm)													
Stage 1 score													
<table><tr><th>Parcel ID</th><th>Site Description</th><th>Purpose score 1</th><th>Purpose score 2</th><th>Purpose score 3</th><th>Overall Score</th></tr><tr><td>P17</td><td>Land at Epsom Common</td><td>3</td><td>3</td><td>3</td><td>9</td></tr></table>		Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score	P17	Land at Epsom Common	3	3	3	9
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score								
P17	Land at Epsom Common	3	3	3	9								
<b>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</b>													
<p>The area scores high against all purposes. However the proposed change is a very small area of verge.</p> <p><u>Defensible Boundaries</u></p> <p>The boundary cuts off the corner abruptly, this could be made more clear and tidy to continue the line along and wrap around the corner here.</p>													
<b>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</b>													

The individual scores for the Green Belt purposes and overall score for the parcel is high, however the size of the proposed amendment is not considered to lead to significant consequent impact as a result of the minor change.

**Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.**

Having weighed up the issues outlined above, it is considered that minor amendment would provide clarity.

The consequent impact is de minimis and would be an improvement.

**003**

**Durdans Stables**



The area is located to the southern edge of the Green Belt in and around Durdan's Farm.

The existing boundary line cuts the property in half, including a building.

To correct this anomaly the boundary could wrap around the building.

The amendment would provide clarity by excluding the entire building rather than slicing it in half where half is in the Green Belt and half is outside.

The consequent impact would be small and an improvement, where the boundary would follow a clear physical feature

**Area 0.0129 ha (129 sqm)**

**Stage 1 score**

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P10	Land immediately west of Chalk Lane	3	2	3	8

**What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))**

<p>The area scores high against purposes almost all of the purposes of the GB.</p> <p>The area the boundary that cuts through Durdan's Farm.</p> <p><u>Defensible Boundaries</u></p> <p>As it is, the boundary cuts through a building. The boundary could be redrawn to follow the edge of the building.</p>
<p><b>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</b></p> <p>The individual scores for the Green Belt purposes and overall score for the parcel is high, however the size of the proposed amendment is not considered to lead to significant consequent impact. The building is listed</p> <p>The site boundaries are well defined vegetation and clear property boundaries.</p>
<p><b>Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.</b></p> <p>Having weighed up the issues outlined above, it is considered that minor amendment would provide clarity.</p> <p>The consequent impact is de minimis and would be an improvement.</p>

#### 004 Christ Church Road open green space



The existing boundary line cuts through the open green space.

To correct this anomaly the boundary could wrap around the entire green space.

The amendment would provide clarity by using a clear physical feature.

The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature

Area: 0.088 ha

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P17	Land at Epsom Common	3	3	3	9

**What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))**

The area scores high for all purposes of the GB in terms of sprawl, merging and safeguarding the countryside from encroachment.

The existing boundary stops short of the tip of the green space.

Defensible boundary

To correct this anomaly the boundary could wrap around the entire green space, continuing the line along the road to the end of the green space and continuing the line south of Park Lawn Avenue wrapping around the edge of the open space.

**To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))**

The individual scores for the Green Belt purposes for the parcel is high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature of a high scoring parcel

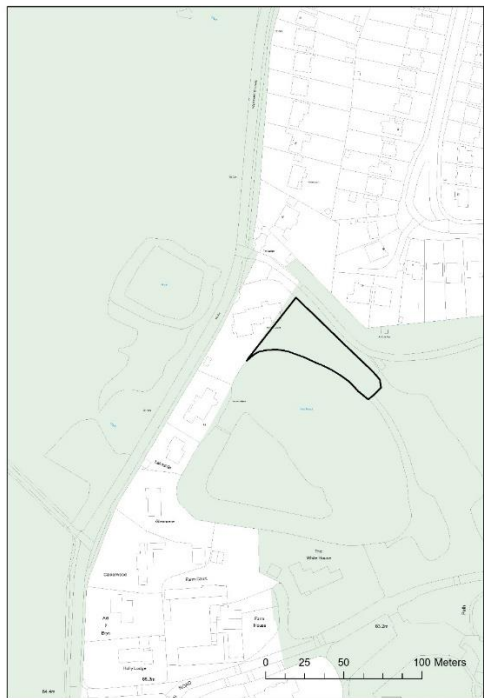
**Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.**

Having weighed up the issues outlined above, it is considered that minor amendment would provide clarity.

The consequent impact is de minimis and would be an improvement.

**005 Wilmerhatch Lane**



	<p>The existing boundary line cuts through a property boundary.</p> <p>To correct this anomaly the boundary could wrap around the entire property line.</p> <p>The amendment would provide clarity by using a clear physical feature.</p> <p>The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature</p>												
<p>Total Site Area: 0.17 ha</p>													
<p>Stage 1 score</p> <table><tr><th>Parcel ID</th><th>Site Description</th><th>Purpose score 1</th><th>Purpose score 2</th><th>Purpose score 3</th><th>Overall Score</th></tr><tr><td>P11</td><td>Land at RAC Woodcote Park Country Club</td><td>3</td><td>2</td><td>2</td><td>7</td></tr></table>		Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score	P11	Land at RAC Woodcote Park Country Club	3	2	2	7
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score								
P11	Land at RAC Woodcote Park Country Club	3	2	2	7								
<p><b>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</b></p>													
<p>The area scores high against purposes of the GB in terms of sprawl and moderate in regards to merging and safeguarding the countryside from encroachment.</p> <p><u>Defensible Boundaries</u></p> <p>As it is, the boundary cuts through a garden of a property. The boundary could be redrawn to follow the property boundary.</p>													
<p><b>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</b></p>													
<p>The individual scores for the Green Belt purposes for the parcel is moderate to high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature of a high/moderate scoring parcel</p>													
<p><b>Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.</b></p>													

Having weighed up the issues outlined above, it is considered that minor amendment would provide clarity.

The consequent impact is de minimis and would be an improvement.

#### 006 Old Barn Road



The existing boundary does not follow a physical feature and the line cuts through a property boundary.

To correct this anomaly the boundary could wrap around the rest of the property line

The amendment would provide clarity by using a clear physical feature.

The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature

Total Site Area: 0.05 ha

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P11	Land at RAC Woodcote Park Country Club	3	2	2	7

**What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))**

The area scores high against purposes of the GB in terms of sprawl and moderate in regards to merging and safeguarding the countryside from encroachment.

#### Defensible Boundaries

As it is, the boundary cuts through a garden of a property. The boundary could be redrawn to follow the property boundary.

**To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))**

The individual scores for the Green Belt purposes for the parcel is moderate to high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature

**Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.**

The individual scores for the Green Belt purposes for the parcel is moderate to high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature of a high/moderate scoring parcel

**007, 55 Longdown Lane North**



The existing boundary does not follow a physical feature and the line cuts through a property boundary.

To correct this anomaly the boundary could wrap around the rest of the property line and the adjoining road.

The amendment would provide clarity by using a clear physical feature.

The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature.

Total Site Area: 0.0029 ha (29 sqm)

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P37	Land north of College Road west of Reigate Road	1	3	2	6

**What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))**

The area scores high against purposes of the GB in terms of merging and moderate in regards to safeguarding the countryside from encroachment and low against sprawl.

**Defensible Boundaries**

As it is, the boundary cuts through a garden of a property. The boundary could be redrawn to follow the property boundary.

**To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))**

The individual scores for the Green Belt purposes vary from low to high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature

**Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.**

The individual scores for the Green Belt purposes for the parcel vary from low to high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature of a high/moderate scoring parcel

**008 Chessington Road / Oak Tree Close**



The site is located to the NW of the Borough near Horton Golf Course. The existing boundary line cuts a bus stop and changing the boundary line neatens the boundary.

The amendment would provide clarity by using a clear physical feature.

The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature

Total Site Area: 0.0277 ha (277 sqm)

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P23	Land at Horton Country Park and Horton Park Golf Club	3	3	3	9

**What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))**

The area scores high against purposes of the GB in terms of merging, sprawl and regards to safeguarding the countryside from encroachment.

#### Defensible Boundaries

The boundary could be redrawn to neaten up the line here.

#### **To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))**

The individual scores for the Green Belt purposes are high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature and neaten the line here.

#### **Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.**

The individual scores for the Green Belt purposes for the parcel are high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature of a high/moderate scoring parcel

#### **009 Wilmerhatch Lane Multiple**



The site/s are to the south west of the Borough. The existing boundary does not follow rear boundary property line to residential dwellings.

There also appears to be a mapping error to the north side of Wilmerhatch Lane which needs correcting.

Total Site Area: 0.1463 ha

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P12	Land to the west of Headley Road	2	3	1	6
P13	Land to the east of The Rye	3	3	3	9

**What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))**

The area/s overlaps two parcels, which vary from low to high scores against purposes of the GB in terms of merging, sprawl and regards to safeguarding the countryside from encroachment.

Defensible Boundaries

The boundary could be redrawn to neaten up the line here and to correct a mapping error which creates a small hole in the boundary.

**To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))**

The individual scores for the Green Belt purposes vary, however the size of the proposed amendment/s not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature


**Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.**

The individual scores for the Green Belt purposes for the parcel vary from low to high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature and would correct a mapping error.

**010 Woodcote Side / Woodcote Green Road**

	Located to the SE of the Borough, a very minor change to boundary to align with the property boundary and neaten up the line.
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Total Site Area: 1 sqm					
Stage 1 score					
Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P14	Land to the south of Dorking Road	3	3	3	9
<b>What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))</b>					
<p>The area scores high against purposes of the GB in terms of merging, sprawl and regards to safeguarding the countryside from encroachment.</p> <p><u>Defensible Boundaries</u></p> <p>The boundary could be redrawn to neaten up the line here.</p>					
<b>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))</b>					
<p>The individual scores for the Green Belt purposes are high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature and neaten the line here.</p>					
<b>Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.</b>					
<p>The individual scores for the Green Belt purposes for the parcel are high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature of a high/moderate scoring parcel</p>					

## 011 Woodcote Side



Area to the south west of the Borough, minor changes to boundary to align with the property boundary and neaten up the line.

The consequent impact would be de minimis and an improvement, where the boundary would follow a clear physical feature

Total Site Area: 0.052 ha (52 sqm)

Stage 1 score

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P14	Land to the south of Dorking Road	3	3	3	9

**What is the nature and extent of the harm to the Green Belt in this location if the site is developed? (Calverton (iv))**

The area scores high against purposes of the GB in terms of merging, sprawl and regards to safeguarding the countryside from encroachment.

### Defensible Boundaries

The boundary could be redrawn to align with the property boundary and neaten up the line here.

**To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent? (Calverton (v))**

The individual scores for the Green Belt purposes are high, however the size of the proposed amendment is not considered to lead to significant consequent negative impact. The consequent impact would be de minimis and an improvement, where the boundary would follow a clear physical feature and neaten the line here.

**Concluding Assessment of whether there are exceptional circumstances that would outweigh the harm to the Green Belt and justify the release of the site from the Green Belt.**

The individual scores for the Green Belt purposes for the parcel are high, however the size of the proposed amendment is not considered to lead to significant consequent

negative impact. The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature of a high/moderate scoring parcel