

## Epsom and Ewell Green Belt Study

Assessment Report

**Epsom and Ewell Borough Council** 

February 2017



#### **1. Introduction**

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

### Requirement for the Study

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

future growth in the borough. Furthermore, the Study will perform a wider role in informing the Surrey LSS by providing an up to date view of how the Metropolitan Green Belt within EEBC is performing, whilst also contributing to the aim of achieving a comprehensive review of the Metropolitan Green Belt as a whole.

#### Scope

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

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

80. Green Belt serves five purposes

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

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

This Study:	This Study DOES NOT:
<ul> <li>Assesses the extent to which land designated as</li></ul>	<ul> <li>Assess the development potential of land designated as</li></ul>
Metropolitan Green Belt in Epsom and Ewell performs	Metropolitan Green Belt; <li>Make recommendations as to the extent or basis of</li>
against the five purposes of Green Belt as set out in	further and more detailed assessments; <li>Make recommendations for amendments to the existing</li>
Paragraph 80 of the NPPF; <li>Provides up to date evidence in relation to how the</li>	Metropolitan Green Belt boundary; <li>Determine whether or not land should be removed from</li>
Metropolitan Green Belt within the borough is performing;	the Metropolitan Green Belt; <li>Consider the role of Metropolitan Green Belt land in</li>
and <li>Assesses discrete parcels of land immediately beyond</li>	wider strategies, policies or programmes; <li>Take account of other constraints such as flood risk or</li>
the currently adopted Metropolitan Green Belt boundary	other statutory designations; or <li>Consider the land's performance in the context of other</li>
which may be suitable for inclusion with the Green Belt.	land-use policies.

#### Approach

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

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

#### **Structure of the Assessment Report**

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

#### **Study Context**

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

#### **Local Context**

1.11. Epsom and Ewell is a borough authority located within the north east of the county of Surrey, adjacent to the London Borough of Sutton (to the north east) and the Royal Borough of Kingston upon Thames (to the north west). The administrative area of Reigate and Banstead Borough Council adjoins EEBC to the south east, with the boundary of Mole Valley District Council adjoining to the south west.

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

#### The Epsom and Ewell Local Plan

1.14. EEBC's proximity to Greater London, and its position within the South East region, places increasing pressure on Epsom and Ewell to accommodate future long-term growth. Within this context, the current Core Strategy, which forms part of the adopted Epsom and Ewell Local Plan, will be partially reviewed. The components which will be included in the partial review of the Core Strategy are a review of the borough's housing targets, affordable housing policy, housing supply strategy, policy approach to the provision of Gypsy and Traveller accommodation and designated Green Belt land, alongside the provision of new policies relating to the borough's heritage assets.

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



#### 2. Study Approach

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

#### **Defining Discrete Parcels**

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

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

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

#### **Assessment Methodology**

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

#### **Non-Green Belt Land**

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

#### **Assessment Criteria**

- 2.11. The assessment of each Parcel was carried out against the following criteria and scoring system. For each of the first four purposes a score of 0, 1, 2 or 3 was assigned, on the basis of the following:
- 0 Parcel does not perform against the purpose
- 1 Parcel is lower performing against the purpose
- 2 Parcel is more moderately performing against the purpose
- **3** Parcel is higher performing against the purpose.

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

#### Table 1 - Assessment Criteria

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



#### 3. Study Findings

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

#### **Designated Green Belt Land**

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





Parcel P09 Land between Chalk Lane and Ashley Road

#### **Purpose 1**

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

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

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





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

#### Purpose 2

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

- 3.10. Lower performing parcels include those areas of Green Belt land to the extreme south of the borough, beyond Langley Vale. Parcels P01 and P03, alongside Green Belt beyond the borough boundary, form a gap of more than 5 kilometres between Langley Vale to the north and smaller settlements of Headley to the south beyond the M25 motorway.
- 3.11. Parcels P30 and P18 do not perform against purpose2 as both parcels are an extension of the existing urban area and, therefore, do not form a gap.





#### **Purpose 3**

- 3.12. Parcels which perform highly against purpose 3 to *'Assist in safeguarding the countryside from encroachment'* are generally those contained areas of Green Belt land which adjoin more rural areas away from the main built-up areas of the borough. Parcels P01 at the southern edge of the borough and the larger parcels P17 and P23 along the western boundary perform highly against this purpose.
- 3.13. Parcels which are more moderately performing are largely those which immediately adjoin the built up areas of EEBC or adjoining boroughs, including parcels P03, P04, and P28. Although adjacent to urban areas, these parcels are mainly characterised by countryside and do not contain development.
- 3.14. Lower performing parcels include those areas of the Green Belt which are enclosed by the urban areas or which contain ribbon development. These parcels include P37 and P35 where ribbon development runs along Reigate Road and Longdown Lane South respectively.

#### **Purpose 4**

- 3.15. Parcels which perform highly against purpose 4 to 'Preserve the setting and special character of historic towns' are those areas of the Green Belt which adjoin Conservation Areas. Parcels P09 and P10 provide clear views of, and extend in to, the Chalk Lane Conservation Area, protecting its setting by restricting development in this location. There are clear views of the historic Durdan's Estate from within P10 and, therefore, this parcel is pivotal in preserving the views of this historic landmark within the Conservation Area.
- 3.16. Parcels which are more moderately performing against purpose 4 include those that surround the hospital clusters in the north west of the borough. Parcels P23, P24 and P28 adjoin and have limited views of The Manor, West Park, Horton and Long Grove Conservation Areas and therefore contribute to their preservation.
- 3.17. Parcels which are lower performing against Purpose 4 include Parcels P40 P42 along the eastern edge of Reigate Road, south of the railway line. These parcels benefit from limited views of the Higher Green and Ewell Downs Road Conservation Areas which are set back from the western edge of Reigate Road by a single row of dwellings.

#### Table 2 - Designated Green Belt Scoring

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

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

#### **Non-Green Belt Land**

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

#### **NG01**

- 3.19. NG01 is a parcel of land directly adjacent to the north west corner of parcel P09 within the Chalk Lane Conservation Area. The roughly square Parcel is bordered to the north by Worple Road and to the west by Chalk Lane. St Martin's C of E Junior School is immediately to the east and an area of woodland lies to the south within parcel P09. The parcel contains business development consisting of business premises and associated car parking set within the grounds of the Grade II\* listed Woodcote Grove. Redevelopment to update and increase the capacity of the site is currently underway.
- 3.20. If designated as Green Belt land, NG01 would be lower performing against purpose 1 to 'Check unrestricted sprawl of large built-up areas'. The parcel does have durable and identifiable boundaries to the north and west being formed of Worple Road and Chalk Lane, but due to the presence of existing built development, especially at its southern boundary, the parcel would be lower performing. The parcel would also be considered as lower performing against purpose 2 to 'Prevent neighbouring towns merging into one another' as it does not represent a gap between urban areas. The dense area of woodland immediately beyond the parcel's southern edge, within parcel P09, forms a natural barrier to the edge of the urban area from the area of open Green Belt land beyond which serves as part of the gap between urban areas within Epsom and Banstead to the south.
- 3.21. NG01 is immediately on the edge of the urban area and adjoins an area of woodland separating the urban edge from the more open area of Green Belt

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

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



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

#### NG02

- 3.23. NG02 is a small discrete parcel of land directly adjacent to Parcel P47 at the end of Beverley Close in East Ewell. The roughly triangular parcel is made up of an area of mature woodland and is bordered by residential gardens to the north, west and south associated with properties on Beverley Close. The area of woodland extends eastwards to form an established hedgerow through the southern portion of the adjacent agricultural field within parcel P47.
- 3.24. If designated as Green Belt land, NG02 would perform more moderately against purpose 1 to *'Check unrestricted sprawl of large built-up areas'.* The parcel's boundaries are formed of residential gardens to the north, west and south which do not provide durable or easily identifiable boundaries. However, the parcel does not contain any ribbon or other development.

- 3.25. NG02 is on the eastern edge of the residential area within East Ewell and forms part of the gap between Belmont to the east and East Ewell to the west. As set out above, whilst these two areas adjoin in the area to the north of parcels P47, P49 and P50, the presence of Green Belt prevents further coalescence and collectively these parcels play an essential role in preventing the further merging of Belmont to the east and East Ewell to the west. If designated as Green Belt, NG02 would contribute to this role and would be considered as higher performing against purpose 2 *'to prevent neighbouring towns merging into one another'*.
- 3.26. The wooded nature of parcel NG02 means that it is generally characterised by countryside and it adjoins countryside to the east. If designated as Green Belt land, NG02 would be more moderately performing against purpose 3 to 'Assist in safeguarding the countryside from encroachment'. Although the parcel directly adjoins agricultural fields within parcel P47, and whilst it is undeveloped, it is surrounded by urban development on three sides. The parcel would not perform against purpose 4 to 'Preserve the setting and special character of historic towns' as it does not contribute to the setting of a Conservation Area.



Parcel NG02 Land to the east of Beverley Close

#### NG03

3.27. NG03 is a small strip of land at The Ridge in the south west of the borough located between designated Metropolitan Green Belt land at parcels P11-P14. The irregularly shaped parcel contains large detached dwellings set in large individual plots bordered by a substantial area of tree cover to the west within parcel P12 and land associated with RAC Woodcote Park Country Golf Club within parcel P11 to the east. Agricultural fields adjoin to the north west within parcel P13.

- 3.28. Whilst the boundaries of NG03 are relatively well defined, being formed of well-established hedgerows and tree lines delineating the boundaries of the large residential plots, the presence of ribbon development means that NG03 would be lower performing against purpose 1 to 'Check unrestricted sprawl of large built-up areas' if designated as Green Belt.
- 3.29. Although ribbon development is present within parcel NG03 it would, alongside parcels P12 and P13, form a gap of approximately 500 metres between the Woodcote area of Epsom to the north east and the eastern edge of Ashtead to the west and south west. Therefore, if designated as Green Belt this parcel would perform highly against purpose 2 'to prevent neighbouring towns merging into one another'.

#### Parcel NG03 Land at The Ridge



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

#### NG04

- 3.3.1.NG04 is a large parcel of designated Green Space at Nonsuch Park in the north east of the borough at its boundary with the London Borough of Sutton to the east. The irregularly shaped parcel is formed of a large swathe of partly wooded open green land which borders the urban areas of Stoneleigh to the north west, Cheam to the east and East Ewell to the south.
- 3.32. The boundaries of parcel NG04 are well defined by dense and well-established hedgerows, tree lines and groups of trees. The parcel is also free from development and therefore would perform highly against purpose 1 'To check unrestricted sprawl of large built-up areas' if designated as Green Belt.
- 3.33. NG04 forms an undeveloped open gap of approximately 1.3 kilometres between the urban areas of Cheam to the east and Stoneleigh to the west. Whilst these areas are adjoined in the area to the north of NG04, the parcel would, if designated as Green Belt land, play a role in preventing the further coalescence of these urban areas. Therefore Parcel NG04 would be considered moderately performing against purpose 2

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

- 3.34. Parcel NG04 is surrounded by urban development on all sides but is relatively substantial in size and free from urbanising development within its boundaries. By virtue of its designation as Green Space parcel NG04 is characterised by countryside and therefore would be more moderately performing against purpose 3 to 'Assist in safeguarding the countryside from encroachment' if designated as Green Belt.
- 3.35. Parcel NG04 would not perform against purpose 4 to *'Preserve the setting and special character of historic towns'* as it is not within or on the edge of a Conservation Area.



Parcel NG04 Land at and adjoining Nonsuch Park

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

#### Table 3 - Non-designated Green Belt Scoring

#### 4. Overall performance

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



Figure 3 - Land at Epsom Downs Racecourse

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

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



Figure 4 - West Park Conservation Area



Figure 5 - Land to the east of Chantilly Way

#### **Notable Parcels**

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

#### Conclusion

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



Figure 6 - Land at Epsom Common



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

# Appendices

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#### Appendix A - Assessment Areas



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**Appendix B** - Purpose 1 (Map)



**ATKINS**<sup>\*\*</sup> Epsom and Ewell Administrative Boundary Parcel Areas Purpose 1 - To check the unrestricted sprawl of large built-up areas 0 = Parcel already developed and/or within the urban area with no clear boundary 1 = Ribbon/other development already present and/or other development detached from the existing built-up area with no clear boundary 2 = Parcel boundary is weak but can be identified and there is no development present 3 = Parcel boundary is clearly identifiable/durable and there is no development present 0.5 This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office. © Crown Copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. CLIENT NAME: EPSOM & EWELL BOROUGH COUNCIL LICENCE NUMBER: 100023771 [2017] Atkins Limited © onsulting Engineers The Hub 500 Park Ave, Tel: +44(0)1454 662000 Fax: +44(0)1454 663333 www.atkinsglobal.com Bristol, South Glos., England, BS32 4RZ EWELL BOROUGH COUNCIL EPSOM & EWELL GREEN BELT STUDY PARCEL AREAS WITH GREEN BELT PURPOSE 1 RESULTS Checked HM Authorised NDK A3 1:40,000 Date 03/02/17 00 5150705\_EPS\_GRN\_OBJ1

Appendix C - Purpose 2 (Map)



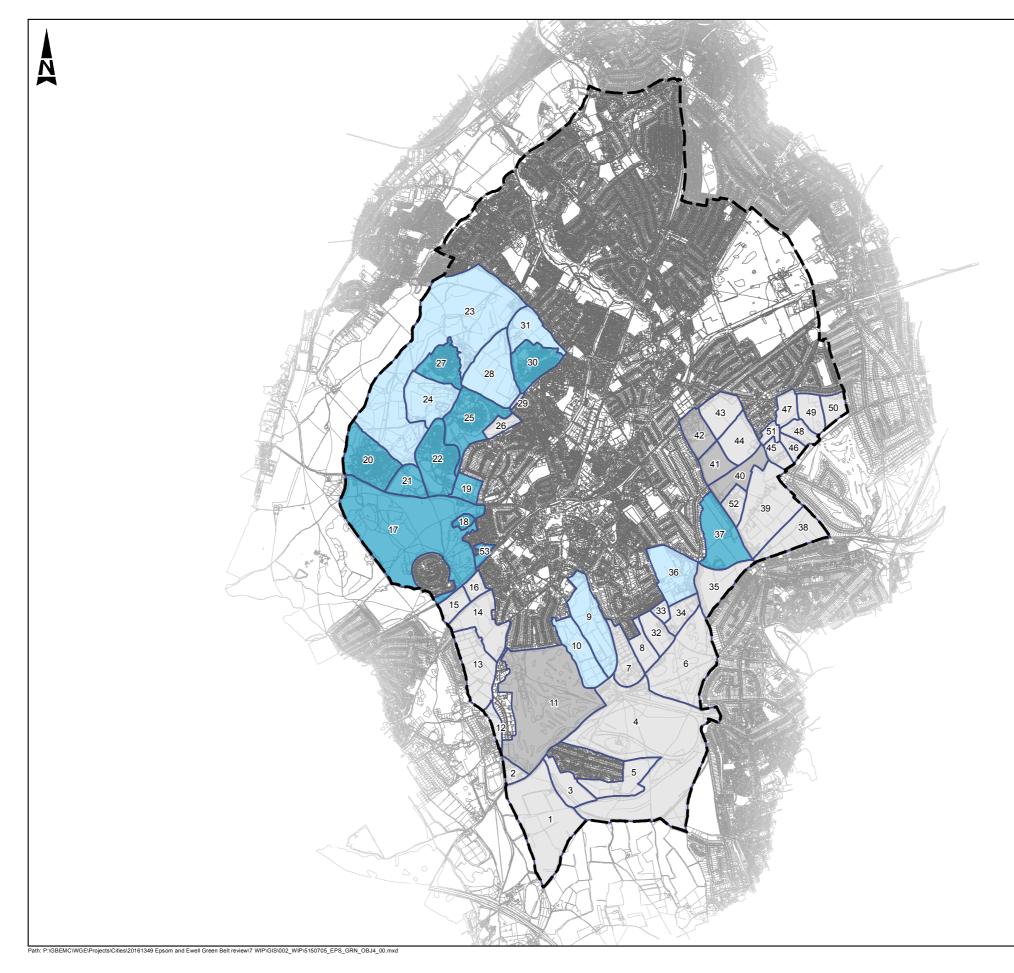
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Appendix D - Purpose 3 (Map)



**ATKINS**<sup>®</sup> Epsom and Ewell Administrative Boundary Parcel Areas Purpose 3 - To assist in safeguarding the countryside from encroachment 0 = Parcel not characterised by countryside, does not adjoin countryside and/or has been developed 1 = Parcel adjoined by countryside and has development present 2 = Parcel generally characterised by countryside, adjoined by countryside and/or has limited development present 3 = Parcel characterised by countryside, adjoins countryside and does not contain any development 0.5 This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the controller of Her Majesty's Stationery Office. © Crown Copyrig Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. CLIENT NAME: EPSOM & EWELL BOROUGH COUNCIL LICENCE NUMBER: 100023771 [2017] Atkins Limited © Consulting Engineers The Hub 500 Park Ave, Bristol, South Glos., England, BS32 4RZ Tel: +44(0)1454 662000 Fax: +44(0)1454 663333 www.atkinsglobal.com EPSOM & EWELL GREEN BELT STUDY PARCEL AREAS WITH GREEN BELT PURPOSE 3 RESULTS Checked HM Authorised NDK gned / Dr SD A3 1:40,000 ate 03/02/ ate 03/0 5150705\_EPS\_GRN\_OBJ3 00

Appendix E - Purpose 4 (Map)



**ATKINS**<sup>®</sup> Epsom and Ewell Administrative Boundary Parcel Areas Purpose 4 - To preserve the setting and special character of historic towns 0 =Parcel not within or adjacent to a Conservation Area within a historic town 1 = Parcel adjacent to a Conservation Area within a historic town but has no views of landmarks and/or the historic core 2 = Parcel adjacent to a Conservation Area within a historic town and has limited views of landmarks and/or the historic core 3 = Parcel adjacent to a Conservation Area within a historic town and there are clear views of landmarks and/or the historic core 0.5 This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the ntroller of Her Majesty's Stationery Office. © Crown Copyrig Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. contr CLIENT NAME: EPSOM & EWELL BOROUGH COUNCIL LICENCE NUMBER: 100023771 [2017] Atkins Limited © Consulting Engineers The Hub 500 Park Ave, Bristol, South Glos., England, BS32 4RZ Tel: +44(0)1454 662000 Fax: +44(0)1454 663333 www.atkinsglobal.com EPSOM BOROUGH COUNCIL EPSOM & EWELL GREEN BELT STUDY PARCEL AREAS WITH GREEN BELT PURPOSE 4 RESULTS Checked HM Authorised NDK gned / Dr SD A3 1:40,000 ate 03/02 ate 03/ 5150705\_EPS\_GRN\_OBJ4 00

#### **Appendix F** - Consultees and Stakeholders

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

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

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

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

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