



# Green Belt Study Update 2024



November 2024



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



## Document history

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# 1 Introduction

## Background

- 1.1 Epsom and Ewell Borough Council is in the process of preparing a new Local Plan for the period to 2040. As part of this it will be identifying the potential scale of, and locations for, new housing and other forms of development across the borough to meet identified needs as a priority issue.
- 1.2 More than half of the land in the borough is urban, or previously developed land, about 40% of it is covered by the Green Belt.
- 1.3 The Council commissioned Atkins to undertake a Green Belt Study and subsequent part 2 study in 2017 and in 2018 respectively. The former divided the Green Belt into 53 parcels and assessed them against the purposes of the Green Belt; the Part 2 study assessed sites within the Green Belt being promoted at the time for future development. Seven years have passed since the original study was published and the Council considers it prudent to review and update the contents of the study and part 2, to reflect any additional sites that may have been submitted through the later call for site exercises and to ensure the studies in general, remain up to date.
- 1.4 A key requirement of the new Local Plan 2022-2040 is for it to be informed by a robust and up to date evidence base.

## Introduction and Purpose of this Update

- 1.5 The decision to review the Green Belt Study was considered when drafting the Local Plan for the Regulation 18 stage. The Council published a [Green Belt Technical Note](#) alongside the Draft Local Plan 2022-2040 (Regulation 18) public consultation between 1 February 2023 to 19 March 2023.
- 1.6 The technical note set out the Green Belt evidence used to inform the Draft Local Plan to date and the methodology for future assessments of the Epsom and Ewell Green Belt designation intended to inform the next iteration of the Local Plan. The technical note set out the framework for an updated assessment comprising of four main assessments, with a proposed methodology for each one. These were open for comment alongside the Draft Local Plan, the comments on the technical note have been taken into account in refining the methodologies contained in this study.
- 1.7 These assessments will form an essential part in the provision of a sound and up to date evidence base to support the development of policies relating to the accommodation of future growth in the borough and will be used to inform decisions relating to the long-term growth aspirations for the borough.
- 1.8 The purpose of this work is to:
  - to assess Epsom and Ewell's Green Belt against the purposes of Green Belt as set out in the NPPF, with a view to potential release for development purposes in the longer term, should this be necessary within the new Epsom and Ewell Local Plan 2022-2040.
  - to assess the existing Green Belt boundary having regard to its intended permanence in the long term, so that it can endure beyond the plan period.
  - to identify defensible Green Belt boundaries for those sites promoted through the call for sites process and detailed in the Land Availability Assessment, with a view to potential release for development purposes in the longer term should this be necessary within the new Epsom and Ewell Local Plan 2022-2040.

## Format and scope

- 1.9 This study will include four assessments:
  - **Section 1:** An assessment of the extent to which land designated as Metropolitan Green Belt within the borough performs against the five purposes as set out in Paragraph 143 of the NPPF. This is essentially a review of the assessment carried out by Atkins in 2017.
  - **Section 2:** An assessment of major previously developed land, currently within the Green Belt.
  - **Section 3:** An assessment of any anomalies which may have arisen or come to the attention of the Council, over time, concerning the current alignment of the Green Belt boundary.
  - **Section 4:** An assessment of the potential for defensible Green Belt boundaries around strategic sites to accommodate growth.

## 2 Section 1: Assessment of the extent to which land designated as Metropolitan Green Belt within the borough performs against the five purposes as set out in Paragraph 143 of the NPPF.

- 2.1 This section reviews the existing Stage 1 assessment carried out in 2017 by Atkins, this assessed to what extent land designated as Metropolitan Green Belt within the borough performs against the five purposes as set out in the NPPF. The assessment was a 'policy off' approach. No consideration of other constraints, policies, strategies or the development potential, was within its scope of this assessment.
- 2.2 This assessment consists of three key stages as follows:
- Stage 1: Defining discrete parcels.
  - Stage 2: Assessing the parcels against the 5 purposes of Green Belt as set out in the NPPF; and
  - Stage 3: Assessing 'non – Green Belt' land immediately adjoining the defined Metropolitan Green Belt boundary in the borough.

### Stage 1

- 2.3 The 2017 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 the NPPF for defining Green Belt boundaries. When defining boundaries, local planning authorities should...*define boundaries clearly, using physical features that are readily recognisable and likely to be permanent* (Para 148(f) NPPF).
- 2.4 These features are not defined but may include:
- Roads (major roads and A-roads);
  - Rail and other permanent infrastructure.
  - Landscape Character Areas.
  - Watercourses.
  - Footpaths and bridleways.
  - Areas of woodland, hedgerows and treelines; and
  - Established field patterns.
- 2.5 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 southwest of the borough where the Green Belt designation stretches beyond the authority boundary where it adjoins the administrative area of Mole Valley District Council. This study will consider the role of the Green Belt in its wider context and will, therefore, assess those parcels at the borough boundary taking account of the character of land beyond it.
- 2.6 The 2017 Study broke down the Green Belt boundary into 53 discrete parcels and assessed each against the Green Belt purposes.

### Stage 2

- 2.7 Once the parcels were defined, the next stage of the study comprised of an assessment of the parcels against the Green Belt purposes.
- 2.8 Each parcel was assessed and assigned a score for the extent to which it performs against each purpose of Green Belt as set out in the NPPF:
- **Purpose 1:** To check the unrestricted sprawl of large built-up areas.
  - **Purpose 2:** To prevent neighbouring towns merging into one another
  - **Purpose 3:** To assist in safeguarding the countryside from encroachment;
- 2.9 In terms of **purpose 4**, "*to preserve the setting and special character of historic towns*", the 2017 study assessed parcels on a broader definition of the setting historic town and consideration was given to parcels in the vicinity of conservation areas. Following responses to the Draft Local Plan that referenced the technical note (Appendix A) and reviewing other studies and Planning Advisory Service (PAS) guidance [Planning on the Doorstep: The Big Issue-Green Belt](#) 2015; it is considered that this purpose relates to very few settlements in practice. This is generally considered to mean entire towns or cities that are considered to be 'historic' rather than smaller areas near conservation areas or other historic designations. Most 'historic towns' are already enveloped by recent development between the historic core and moving out to the open countryside. As such, following further consideration, this review will not include the scores assigned to parcels in relation to purpose 4.
- 2.10 In terms of **purpose 5**, "*to assist in urban regeneration, by encouraging the recycling of derelict and other urban land*"; by virtue of its designation, all Green Belt land is considered to make an equal contribution to the fifth purpose of Green Belt 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. Therefore, parcels will not be scored against this purpose.
- 2.11 It is important to note that parcels should not be ranked against each other, that said, the overall score has been included to provide a broad picture. It should also be noted that each of the purposes of Green Belt carry equal weight and, therefore, parcels may perform poorly against one purpose and highly against others. This approach is wholly consistent with the requirements of a strategic Green Belt study.
- 2.12 For each of the three purposes a score of 0, 1, 2 or 3 is 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
- 2.13 The scores from the 2017 study differ only in that the score for purpose 4 has not been included in this update. Taking this into account the overall score has been adjusted respectively and are as follows.

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P01	Land to the south east of Langley Vale Road	3	1	3	7
P02	Land to the south west of RAC Woodcote Park Country Club	2	2	2	6
P03	Land to the south west of Langley Vale	2	1	2	5
P04	Land at Epsom Downs Racecourse	3	2	2	7
P05	Land to the east of Langley Vale	3	2	2	7
P06	Land at Epsom Golf Course	2	2	3	7
P07	Land between Downs Road and Ashley Road	3	2	2	7
P08	Land to the east of Downs Road	3	2	3	8
P09	Land between Chalk Lane and Ashley Road	3	2	3	8
P10	Land immediately west of Chalk Lane	3	2	3	8
P11	Land at RAC Woodcote Park Country Club	3	2	2	7
P12	Land to the west of Headley Road	2	3	1	6
P13	Land to the east of The Rye	3	3	3	9
P14	Land to the south of Dorking Road	3	3	3	9
P15	Land to the north of Dorking Road west of Wells Road	3	3	3	9
P16	Land to the north of Dorking Road east of Wells Road	3	3	3	9
P17	Land at Epsom Common	3	3	3	9
P18	Land at Bracken Path and Church Side	0	0	1	1
P19	Land to the north of Christ Church Road	1	0	2	3
P20	Land at and immediately surrounding West Park former hospital site	1	0	1	2
P21	Land to the east of West Park former hospital site	3	3	2	8
P22	Land at and immediately surrounding Horton former hospital site	0	0	1	1
P23	Land at Horton Country Park and Horton Park Golf Club	3	3	3	9
P24	Land to the west of Horton Lane north of Epsom Polo Club	3	2	2	4
P25	Land at The Manor former hospital site	0	0	1	1
P26	Land at Long Grove Park	2	3	2	7
P27	Land at Clarendon Park (Long Grove former hospital site)	0	0	1	1
P28	Land to the north of Chantilly Way east of Horton Lane	3	3	2	8
P29	Land to the east of Chantilly Way	2	0	0	2
P30	Land at St Ebba's former hospital site	0	0	1	1
P31	Land to the north west of St Ebba's former hospital site	2	3	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
P33	Land to the east of Burgh Heath Road south of Beech Way	3	2	2	7
P34	Land north of Epsom Golf Course east of Burgh Heath Road	2	2	2	6
P35	Land to the east of Longdown Lane South, south of College Road	1	3	2	6
P36	Land at Epsom College	1	2	1	4
P37	Land north of College Road west of Reigate Road	1	3	2	6
P38	Land to the east of Reigate Road north of railway line at North Looe	3	2	3	8
P39	Land to the east of Reigate Road west of Higher Drive at North Looe	2	2	2	6
P40	Land between Reigate Road and Banstead Road	2	2	2	6
P41	Land at Glyn School Sports Pavilion	2	3	2	7
P42	Land at and associated with NESCOL College	1	3	1	5
P43	Land to the east of NESCOL College	3	3	2	8
P44	Land to the west of Banstead Road south east of NESCOL College	2	3	2	7
P45	Land at DW Fitness Banstead Road	3	3	1	7
P46	Land north west of Cuddington Way	3	3	3	9
P47	Land south of Cheam Road	3	2	3	8
P48	Land at Cuddington Golf Course north of Cuddington Way	3	2	3	8
P49	Land south of Northey Avenue west of Sutton Grammar School Sports Ground	3	3	3	9
P50	Land at Sutton Grammar School Sports Ground	3	3	3	9
P51	Land to the south of Fairview east of Banstead Road	3	3	3	9
P52	Land to the east of Reigate Road	0	0	1	1
P53	Land south of Wheelers Lane north of Evelyn Way	3	3	3	9

Table 1 Parcels and scores for Purpose 1 to Purpose 3 with overall scores

- 2.14 The scores reflect those of the 2017 study without the scores for purpose 4. On reflection, guidance and advice from stakeholders have drawn attention to the limited circumstances where the purpose applies.
- 2.15 The individual scores for each purpose and overall scores are set out in Table 1 above. The score broadly follows a high, medium and low scoring system. The criteria based assessment and explanation is contained in Table 2 below ( Table 1 in the 2017 study ). For example in regard to *Purpose 1 to check the unrestricted sprawl of large built-up areas*, the criteria for assessment considers whether the parcel is already developed, how well contained, the role it plays in restricting sprawl and how clear the boundaries are.

Green Belt Purpose	Parcel Criteria and Scoring	Assessment Considerations
1. To check unrestricted sprawl of large built-up areas	<p>Is ribbon or other development present within the Parcel?</p> <p>Is other development detached from the existing built-up area?</p> <p><b>Scoring</b></p> <p>Parcel is already developed and/or is within the urban area with no clear boundary =  <b>0</b> Parcel does not perform against the purpose</p> <p>Ribbon/other development is already present and/or other development is detached from the existing built-up area with no clear boundary =  <b>1</b> Parcel is lower performing</p> <p>Parcel boundary is weak but can be identified and there is no development present =  <b>2</b> Parcel is more moderately performing</p> <p>Parcel boundary is clearly identifiable/durable and there is no development present =  <b>3</b> Parcel is higher performing</p>	<p>Consideration should be given to how well contained the urban area is by the Parcel, i.e. what role does it play in restricting the spread of urbanising development. Ribbon development is an indication that the Green Belt is not performing.</p> <p>Durable boundaries are considered to be roads and other infrastructure, permanent natural features such as watercourses, flood plains, protected woodland, etc. Less durable boundaries are considered to be field boundaries, hedgerows and treelines. Whilst easily identifiable, these features are less durable.</p>
2. To prevent neighbouring towns merging into one another	<p>Does the Parcel represent a 'gap' between urban areas? Is the Parcel within an existing urban area?</p> <p><b>Scoring</b></p> <p>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</p> <p>Parcel represents a gap of more than 5 kilometres between urban areas =  <b>1</b> Parcel is lower performing</p> <p>Parcel represents a gap of between 1 and 5 kilometres between urban areas and is not within an existing urban area =  <b>2</b> Parcel is more moderately performing</p> <p>Parcel represents a gap of less than 1 kilometres between urban areas and is not within an existing urban area =  <b>3</b> Parcel is higher performing</p>	<p>Merging can reasonably be expected if a gap of less than 1 kilometre is identified. Parcels representing gaps of less than 1 kilometre play an essential role in preventing the merging of urban areas.</p>
3. To assist in safeguarding the countryside from encroachment	<p>Is the Parcel characterised by countryside? Does the Parcel adjoin areas of countryside?</p> <p>Is ribbon or other development present within the Parcel?</p> <p><b>Scoring</b></p> <p>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</p> <p>Parcel is adjoined by countryside and has development present =  <b>1</b> Parcel is lower performing</p> <p>Parcel is generally characterised by countryside, is adjoined by countryside and/or has limited development present = <b>2</b>  Parcel is more moderately performing</p> <p>Parcel is characterised by countryside, adjoins countryside and does not contain any development =  <b>3</b> Parcel is higher performing</p>	<p>Countryside is considered to be land which is rural and open including farmland. Associated agricultural buildings are not considered to be development for the purposes of assessing the encroachment of urban development.</p> <p>Development at Epsom Downs Racecourse which is directly related to the racecourse is not considered to be urbanising development in line with the approach to the assessment of planning applications for such development, permitted development rights and the NPPF. The same approach will be taken to equestrian related development which is detached from the Racecourse.</p>
4. Preserve the setting and special character of historic towns	<p>The 2017 scores for this purpose have not been included. This purpose is generally accepted as relating to very few settlements in practice. In most cases, historic towns have already been enveloped by recent developments between the historic core, and the countryside between the edge of the town.</p>	
5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land	<p>By virtue of its designation all designated Green Belt land is considered to make an equal contribution to the fifth purpose of Green Belt. Therefore parcels have not been assessed against this purpose.</p>	

Table 2 Assessment Criteria



2.16 It is important to understand why parcels should not be ranked against each other, whilst the overall score can give a broad indication of what parcels may be either the highest performing or lowest performing overall for all green-belt purposes, each parcel is ultimately unique and drawing direct comparisons can lead to misinterpretations. In addition, the overall scores are made up of individual scores for each purpose, for example it may perform highly on one purpose and not for others. Therefore, it is important to look at each score for each parcel individually.

2.17 There are 11 sites with the highest performing overall score of 9, these are Parcels 13-17, 23, 46, 49-51 and 53, which means these performs the highest score for all purposes. The lowest score of 1 was identified on 6 Parcels, these are Parcel 18, 22, 25, 27, 30 and 52, meaning it only scored the lowest score for one of the purposes. The lowest scoring parcels are mainly areas that contain significant built development, these include many former hospital clusters. Major developed sites in the Green Belt and the former hospital clusters will be assessed further in Section 2.

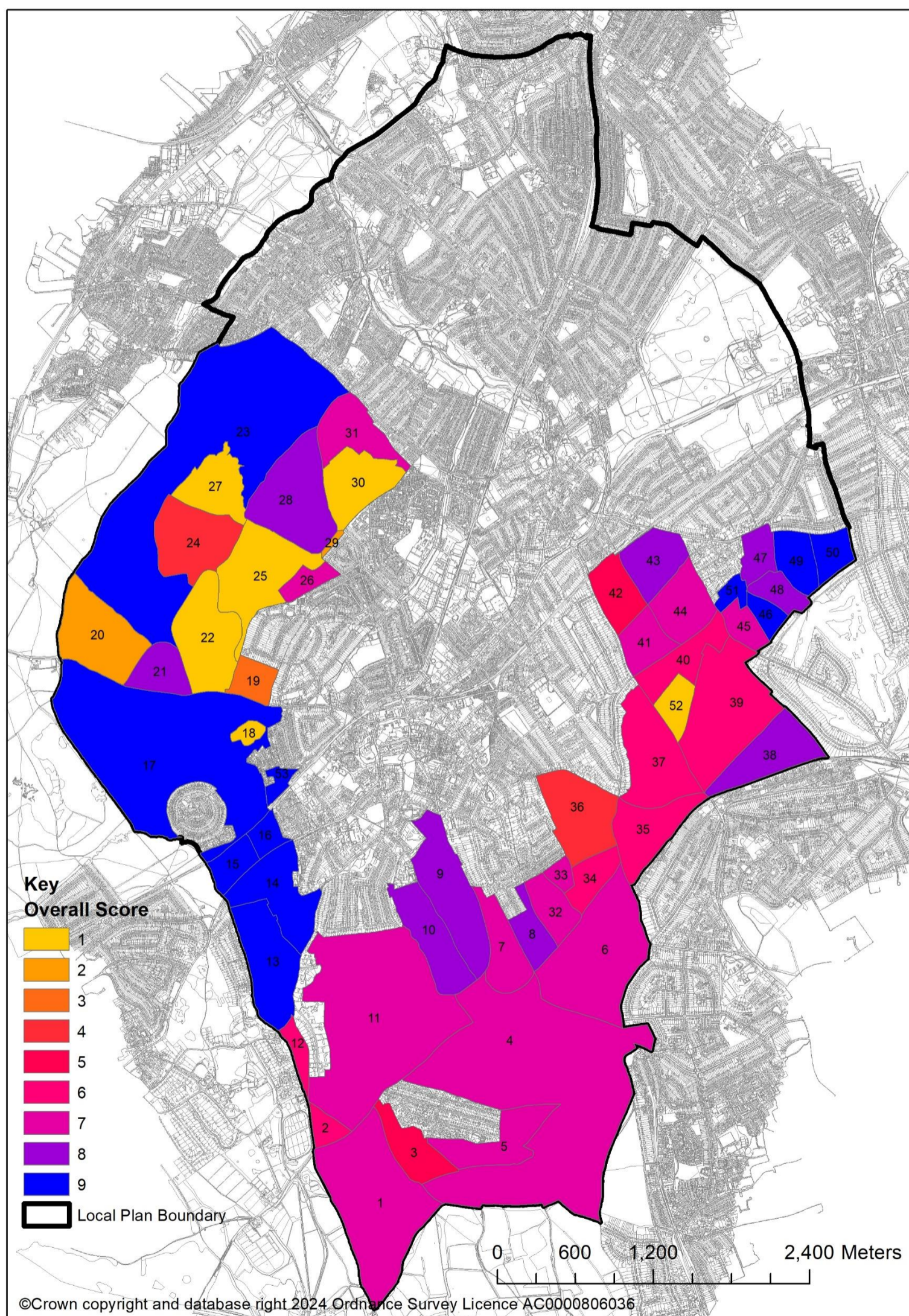


Figure 1 Map showing the overall scores for the Green Belt

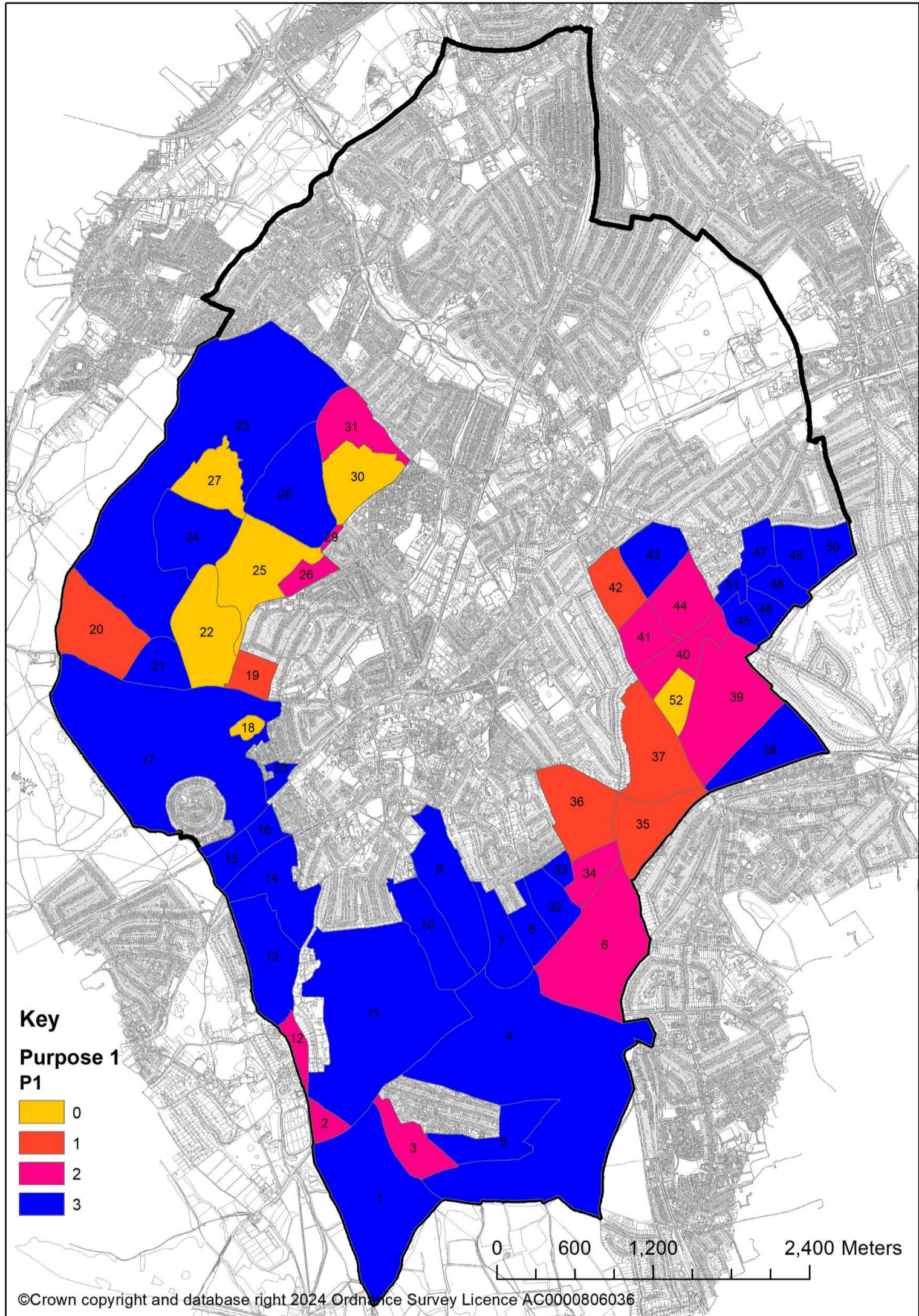


Figure 2 Map showing the scores for Green Belt parcels with respects to Purpose 1 To check the unrestricted sprawl of large built-up areas.

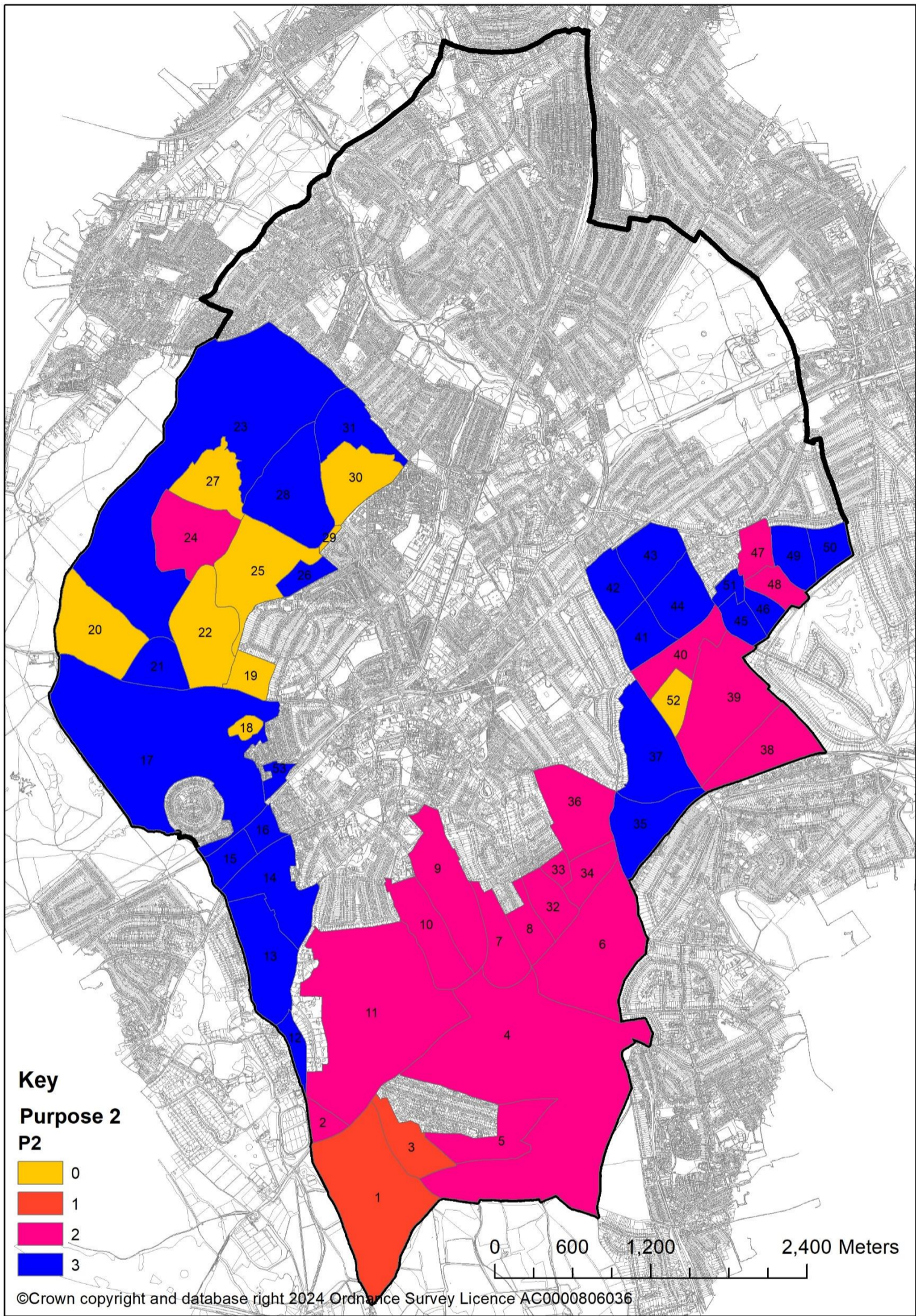


Figure 3 Map showing the scores for Green Belt parcels with respects to Purpose 2 'to prevent neighbouring towns merging into one another'

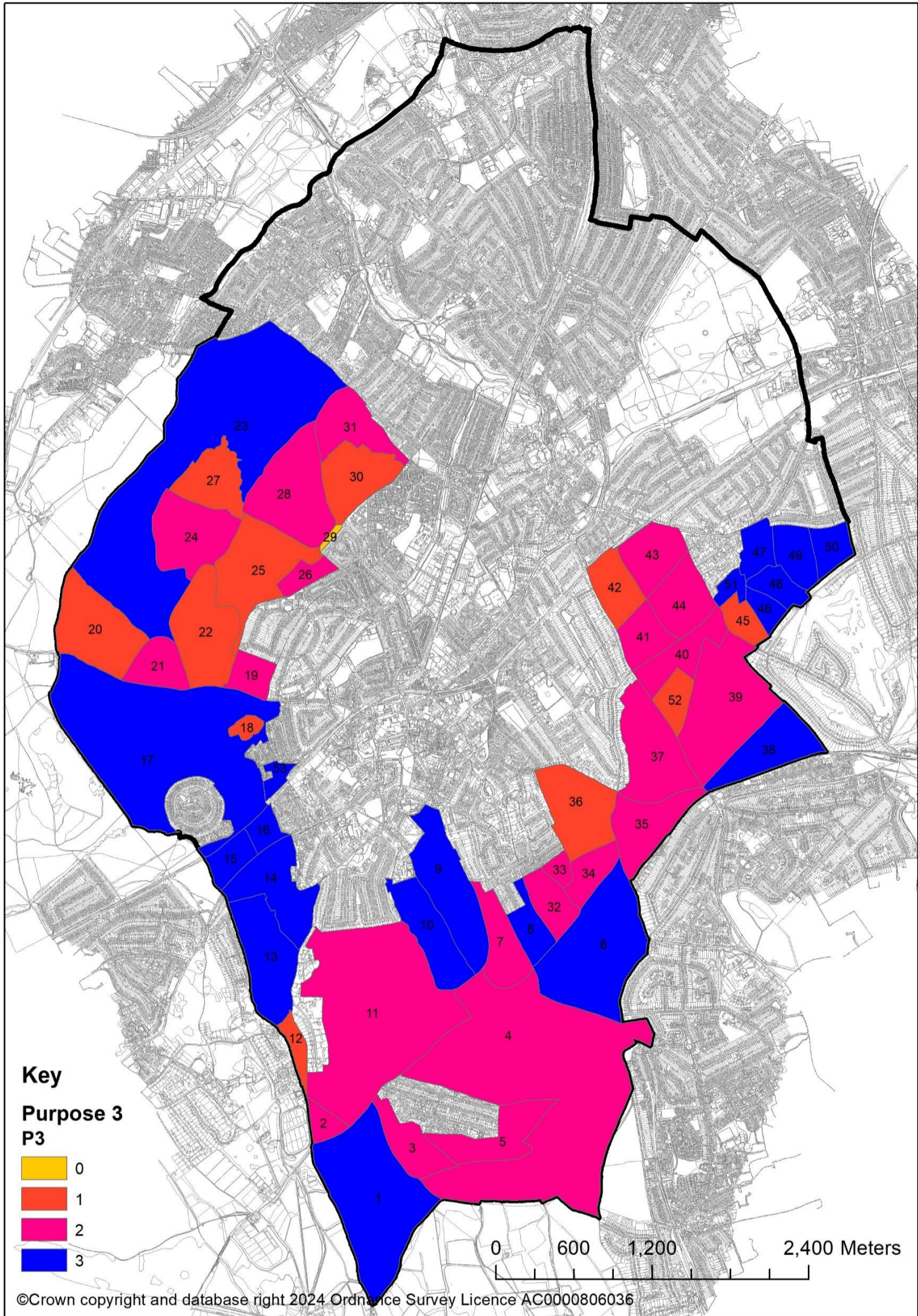


Figure 4 Map showing the scores for Green Belt parcels with respects to Purpose 3 'to assist in safeguarding the countryside from encroachment'

### Stage 3

2.18 This stage of the first assessment reviews those areas of undesignated land immediately adjoining the defined Metropolitan Green Belt boundary in the borough, which may be considered as suitable for inclusion in the Green Belt, will be defined and assessed against the same criteria as designated Green Belt land. This was carried out in the 2017 study. Four areas of non-green belt areas were assessed. As with the other parcels, we will discount the scores for purpose 4 the scores are detailed in Table 3 below

<b>Non-GB land</b>	<b>Parcel Name</b>	<b>Purpose 1 Score</b>	<b>Purpose 2 Score</b>	<b>Purpose 3 Score</b>	<b>Overall score</b>
NG01	Land to the south of Worple Road east of Chalk Lane	1	1	0	2
NG02	Land to the east of Beverley Close	2	3	1	6
NG03	Land at The Ridge	1	3	1	5
NG04	Land at and adjoining Nonsuch Park	3	2	2	7

Table 3 Assessment scores for non-GB sites in the Borough

2.19 Paragraph 144 of the NPPF states that any proposals for new Green Belts should be set in strategic policy and should meet be justified based on the criteria set out. The scoring shows in general moderate scores which would not suggest any exceptional circumstances to alter the Green Belt boundary to include these areas.

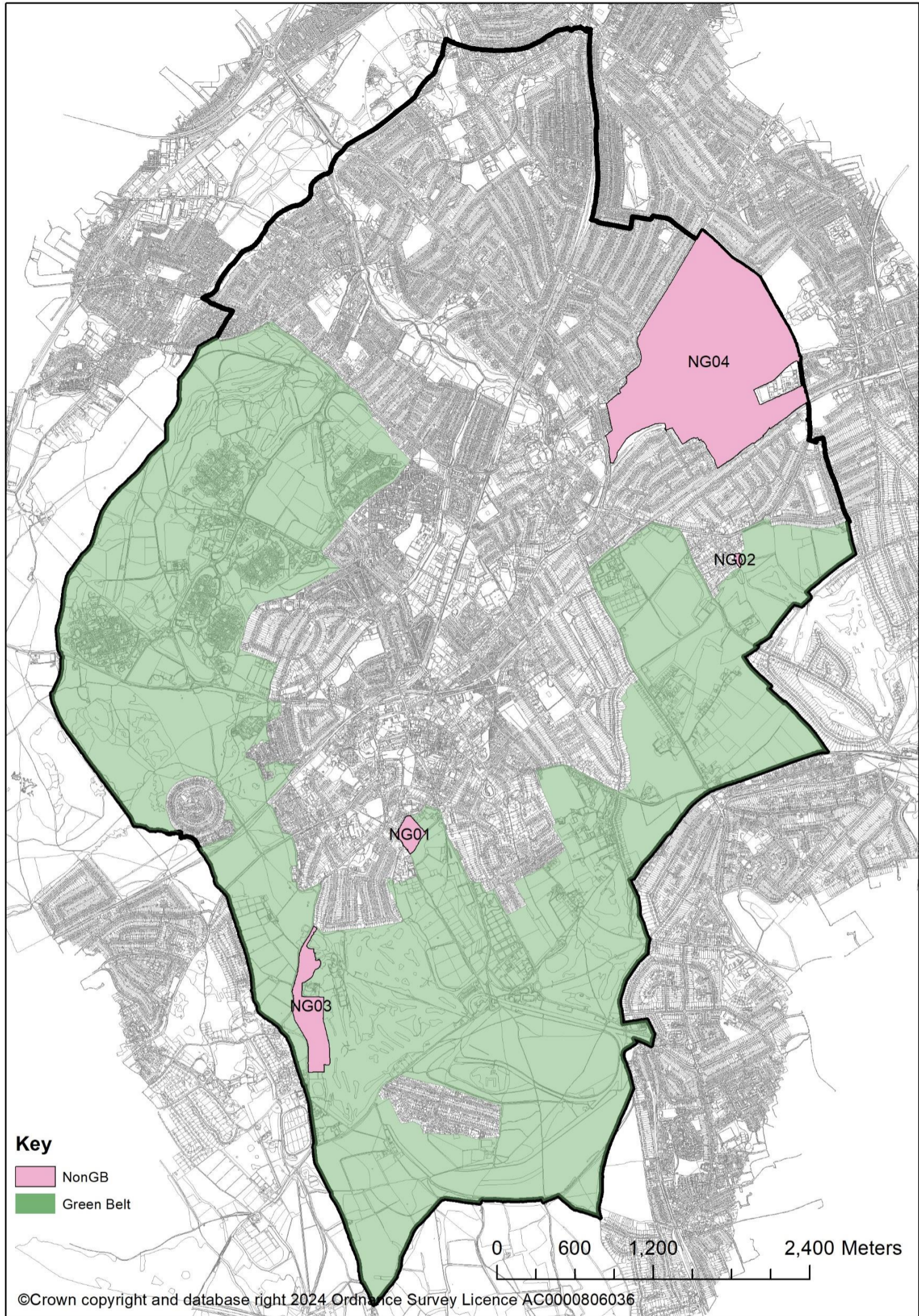


Figure 5 Map showing areas of non-Green Belt land assessed against the Green Belt purposes

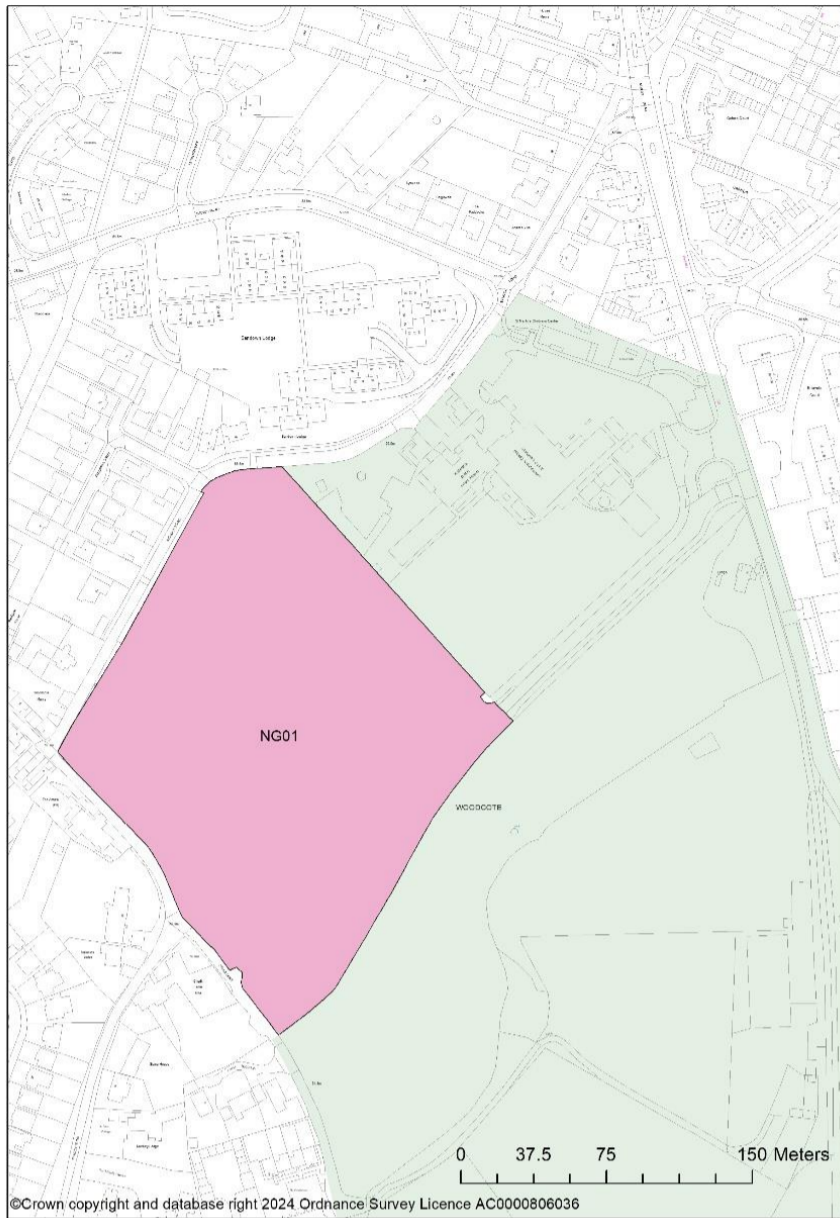


Figure 5.1 NG01 Land to the south of Worple Road east of Chalk Lane

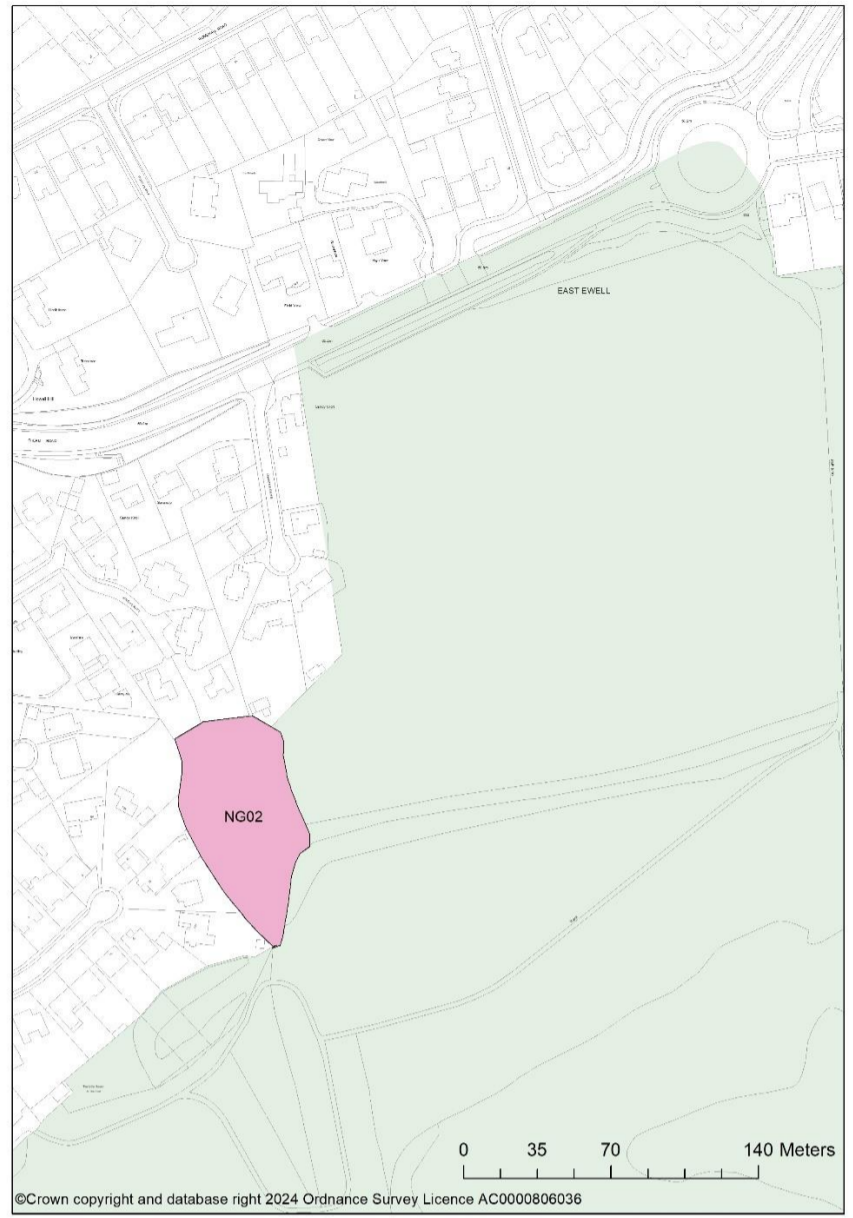


Figure 5.2. NG02 Land to the east of Beverley Close

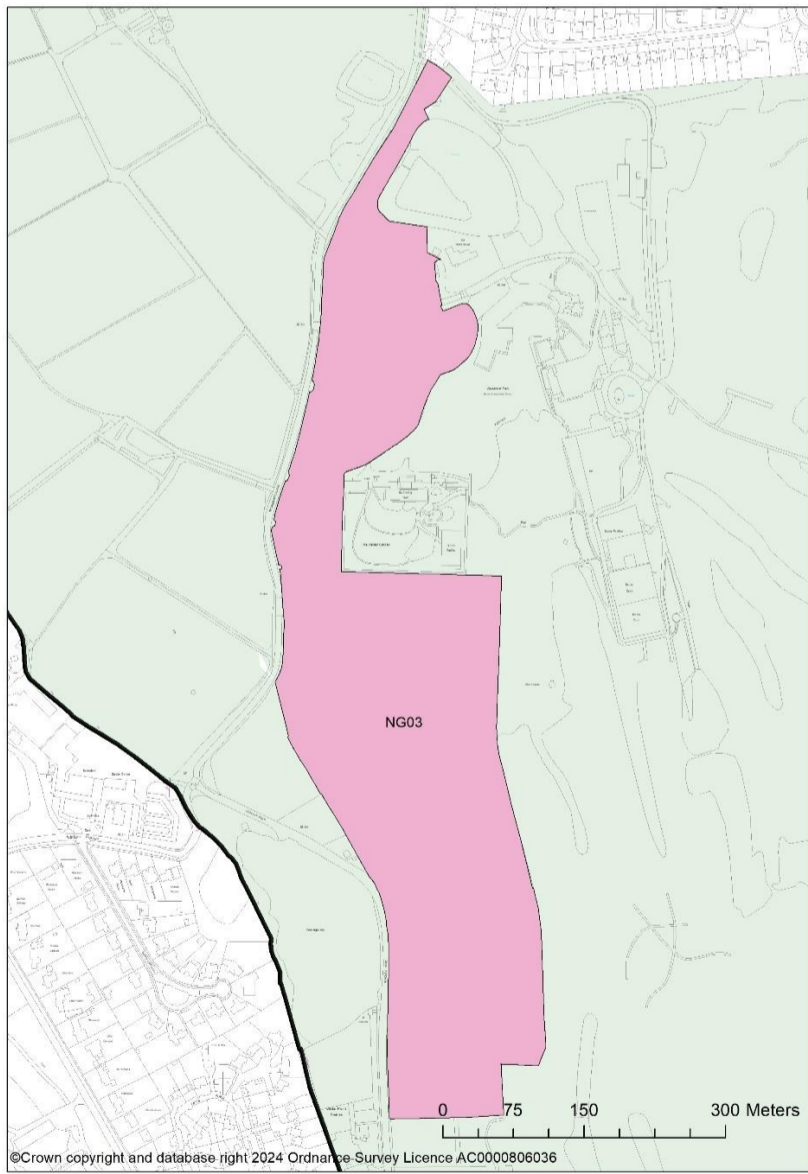


Figure 5.3 NG03 Land at The Ridge

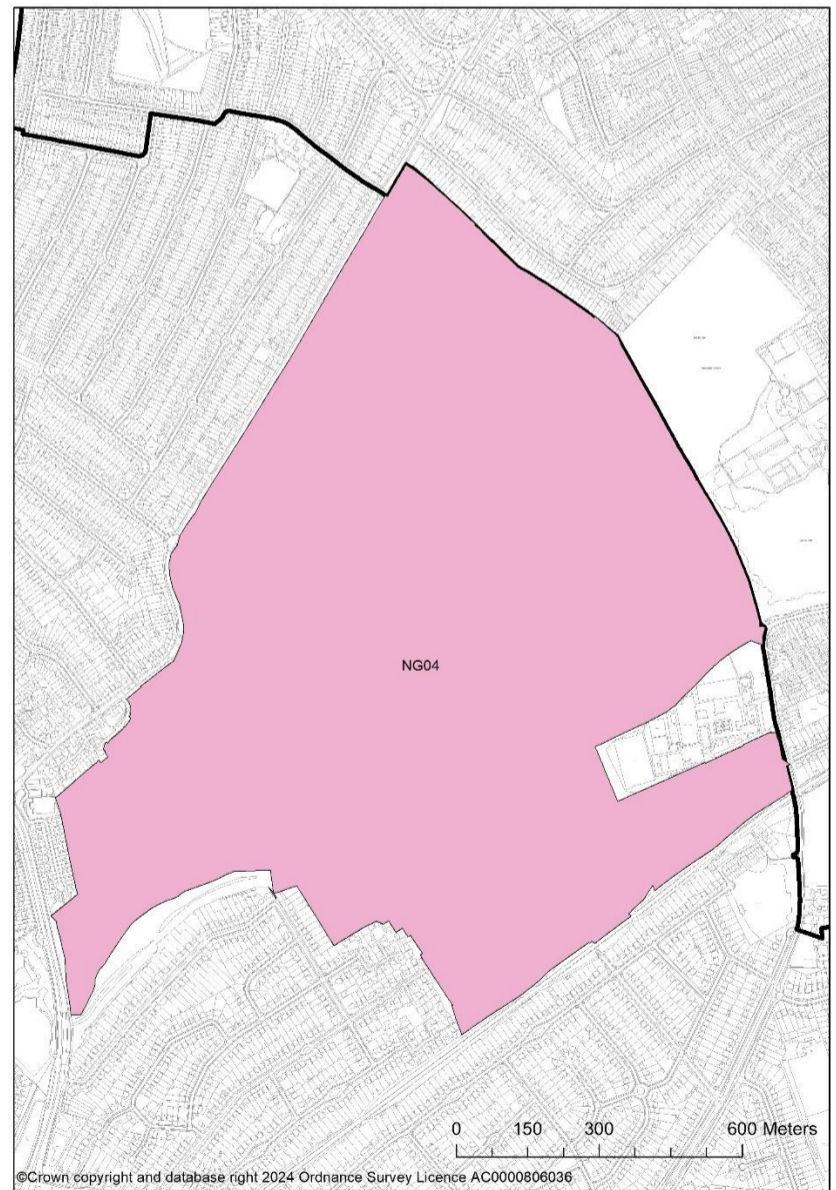


Figure 5.4 NG04 Land at and adjoining Nonsuch Park

## 3 Section 2: Assessment of major previously developed land, currently within the Green Belt

3.1 The second assessment is to assess whether there are areas of the existing Green Belt, specifically former or existing designations 'major developed sites within the Green Belt' should be inset (i.e. removed from the Green Belt).

### Current Development Plan

3.2 Major developed sites in the Green Belt are an existing designation within the Council's Development Plan. The Epsom and Ewell [Core Strategy \(2007\)](#) makes reference to these in Policy CS2 Green Belt and CS8 Broad Location of Housing Development where infilling and redevelopment may be permitted, Policy DM2 Major Developed Sites in the Epsom and Ewell [Development Management Policies Document \(2015\)](#) provides further detail setting out that limited infilling in these locations would be permitted provided that it satisfies the criteria set out in the policy. Major Developed sites in the Green Belt consisted of institutional uses set within extensive grounds and was a former national and Structure Plan policy (which following changes to national and regional planning policy no longer exists) but was taken forward in the current Development Plan. Policy DM2 states that limited infilling within the boundaries of Major developed sites defined in the Local Plan 2000 (described in paragraph 2.7 in the Development Management Policies Document 2015 as being seven sites, including the former hospital clusters, Epsom College and NEScot).

### Previous Development Plan

3.3 The 'Hospital Cluster' were identified in the 1996 Local Plan and consisted of Horton Hospital, Long Grove Hospital, The Manor Hospital, St Ebba's Hospital, Hollywood Lodge and the Central Boiler House (See Figure 6). The 1996 Local Plan contained a full chapter on the Hospital Cluster (Chapter 5) containing several policies (HC1-HC17) for the redevelopment of the hospitals into 1500 dwellings. At this time West Park Hospital was not identified for redevelopment and did not form part of the 'cluster' as identified in the policy, however West Park constituted as a Major Developed Site in the Green Belt and proposals for that area were covered by GB12 and GB13 of the 1996 Local Plan.

### Methodology

3.4 The methodology for the assessment in this section was set out in the technical note and consists of two main stages:

- **Stage 1:** Does the major previously developed site possess open character, justifying its retention within the Green Belt, and resistance of notable future redevelopment or expansion?
- **Stage 2:** If the site does not contribute to the openness of the wider Green Belt does the major previously developed site exhibit defensible boundaries that would allow for inseting in accordance with the NPPF.

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

3.5 Paragraph 148 of the NPPF advises that when defining Green Belt boundaries, local authorities should not include land which it is unnecessary to keep permanently open. In this regard, if major previously developed sites are of sufficient scale and do not possess an open character, and therefore unnecessary to keep them permanently open.

3.6 Paragraph 149 of the NPPF refers to villages within the Green Belt only being included within the Green Belt if the open character of the village makes an important contribution to the openness of the Green Belt. Whilst recognising that the major previously developed sites in the borough are not villages, it is considered reasonable to adopt a similar approach towards their potential for inclusion or inseting within the Green Belt.

3.7 On reviewing other Green Belt Review studies elsewhere (e.g. Runnymede, Reigate and Banstead) and the approach to inseting, some authorities have taken the approach to first assess whether an area is a 'village' before assessing whether it should be washed over or inset from the Green Belt boundary. It is not our intention to take this approach. Given the size of the Borough and the geographical make up of the Borough we do not consider this a necessary step. The Borough does not contain defined "villages" or specific policies on settlement hierarchy. The structure of the Borough is largely characterised as urban area or Green Belt and therefore it is considered that the key assessment in this regard is the site's contribution to the openness to the Green Belt. We do not consider the former hospitals cluster as villages but more self-contained settlements, similar to 'the Wells', 'the Ridge or 'Langley Vale' within the Borough which are all inset from the Green Belt.

3.8 For this assessment, we are assessing areas of major previously developed sites within Green Belt. These are set out in policy DM2 as being those defined in the Local Plan 2000. We have included what are known as the former hospital sites or former 'hospital clusters' (St Ebba's, Long Grove, Manor and Horton Hospital) in this assessment.

3.9 In order to assess whether the major previously developed sites possess an open character, we will calculate the proportion of the site that is developed and what proportion is undeveloped to help inform whether the site displays an open character.

3.10 In addition to calculating the approximate percentage of built coverage or development footprint of the site, consideration will also be given to its appearance and the site area when assessing the presence or absence of open character. Other considerations including density, type of dwellings (e.g. detached, semi-detached, terraced, or flatted), plot size, layout, extent of open areas, building heights and boundary treatments, topography and degree of vegetation and views in/out of the area will assist in whether the area has an open character and to what degree. To determine this, a criterion has been developed from other studies (Runnymede, St Albans, Guildford<sup>1</sup>).

- **Low:** Area dominated by built form with closely spaced two story or higher flats, terraces or semi-detached/detached properties set in modest/small plots in uniform patterns or blocks. Enclosures predominantly man-made. Open areas are few, or incidental with limited gaps in frontages restricting or partially restricting views through. Any longer views through gaps are obscured or partially obscured predominantly by built development. Limited stands of trees/copses or non-landscaped vegetation.
- **Medium:** Area has a built character with clusters of detached/semi-detached single/two storey dwellings set in modest plots. Modest gaps in frontages with largely unrestricted short views through. Longer views partially obscured by built development or obscured/partially obscured by vegetation. Enclosures either natural or man-made. Modest amount of open areas within the boundary.
- **High:** Buildings are dispersed within the area and are predominantly detached single/two storey set in large plots. Extensive gaps between development with short views predominantly unrestricted and long views unobscured or partially obscured by vegetation. Enclosures are either natural or if man-made are low lying or obscured by vegetation. Open areas present throughout the area.

<sup>1</sup> Runnymede GB Technical Note <https://www.runnymede.gov.uk/planning-policy/planning-policy-evidence-based-documents/11>; St Albans GB Review <https://www.stalbans.gov.uk/green-belt-documents>; Guildford GB and Countryside Study Volume IV <file://eebc.gov.uk/eebc/Town%20Hall/User%20Folders/DControl/poonw111/Downloads/Vol IV 17 04 2014.pdf>



3.11 The assessments have been carried out using a combination of site visits (undertaken between May and June 2024), a desk based assessment using digital mapping and other software.

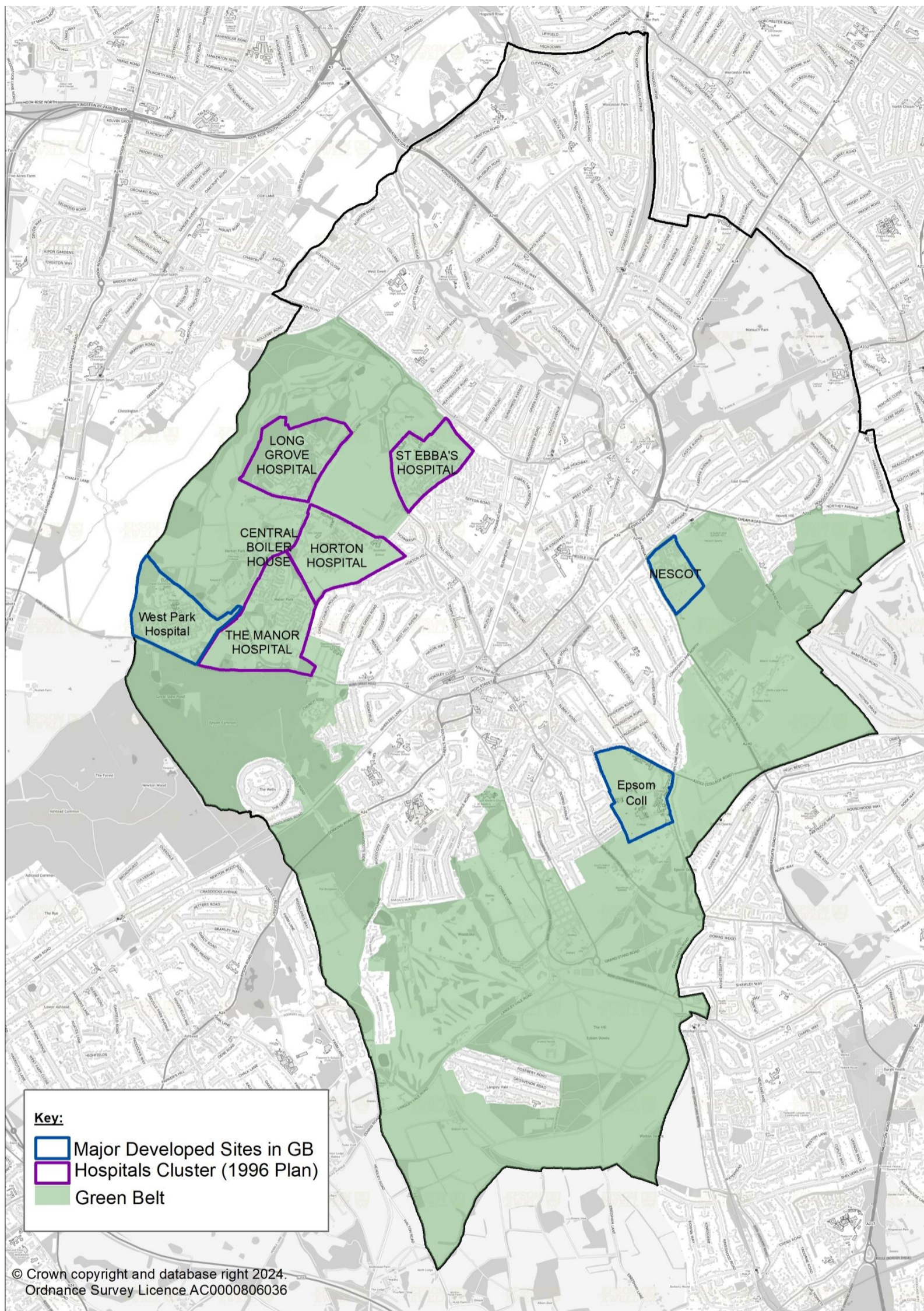


Figure 1 Map showing Major Developed Sites in Green Belt and Hospital Cluster

3.12 The Major development Sites are listed as follows:

Site Name	GBS Parcel reference (see Table 1 and Map 1)	Reference
West Park Hospital	20	20_001
Epsom College	36	36_001
NESCOT	42	42_001
Hook Road Residential (Former St EBBA's Hospital)	30	30_001
Livingstone Park Horton Area (Former Horton Hospital)	25	25_001
Manor Park (Former Manor Hospital)	22	22_001
Clarendon Park (Former Long Grove Hospital)	27/23	27_001

Table 4. List of sites to be assessed in section 2

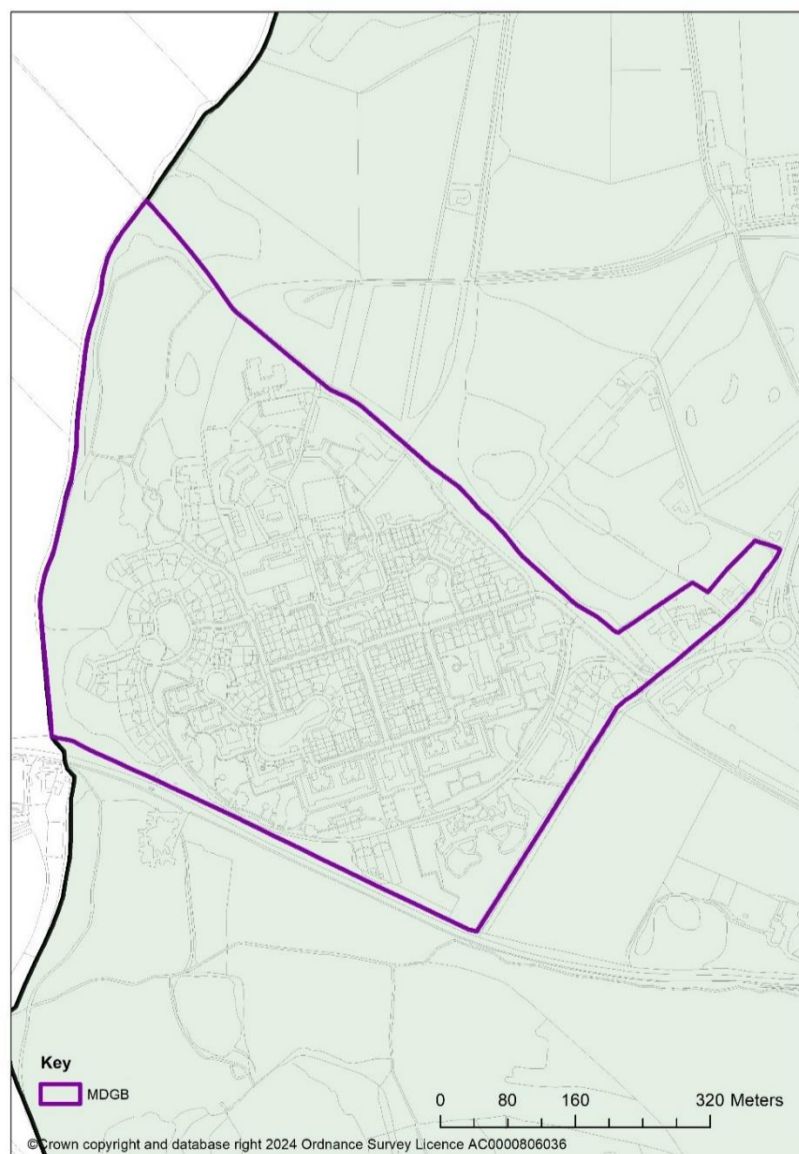
3.13 Most of the sites fall within one of the parcels in Section 1, some overlap multiple parcels, the scores from section 1 are noted to provide context.

### Site 20\_001 West Park Hospital

3.14 West Park Hospital is currently allocated in the borough's development plan as a Major Developed Site within the Green Belt. The area did not form part of the Hospital Cluster allocation in earlier Local Plans but was a Major developed site in the Green Belt. Since then, residential development has taken place here on most of the site and currently comprises of mainly residential uses with limited NHS/Hospital uses remaining.

3.15 The majority of the site falls mainly within Parcel 20, with an overall score of 2. A small tip to the east falls within Parcel 23 with an overall score of 9.

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



Map of the site



Percentage of the site	Percentage	Area (ha)
Buildings	11.16	3.9
General Surface (inc gardens)	38.00	13.28
Natural Environment	41.43	14.48
Path	2.95	1.03
Roads	6.47	2.26

### Existing uses

The area is known as West Park, it comprises mainly of residential uses with some hospital facilities remaining to the south and north of the area, known as The Cottage Hospital and 'The Poplars Physiotherapy Centre'.

**Total Area of MDS**

34.95 ha

**Built development**

The proportion of the site in built development is 20.47 ha or 59%% (comprising of buildings, paths roads and general surface- which includes garden land).

The density of the area varies throughout the site but overall is around 26 dph within a parkland setting. Approximately 59% of the area is built up and 41% is parkland, open green space, play area.

**Building heights and footprint**

Varies between 2-4 storeys. There is a historic water tower that is 6 storeys and Grade II listed that has been retained as part of the development of the site. Building footprints vary, newer detached properties on modest sized plots near the centre and western part of the site; and buildings with large footprints either converted or new apartment buildings to the southern and south eastern part of the site.

**Enclosures**

Domestic enclosures e.g. walls, fence. Most of the area is enclosed by Vegetated edge/ tree belt. A dense tree belt to the south limits views in/out. A narrow tree belt to the east (and SW) allows for some views during the autumn/winter when the foliage dies back.

**Topology**

A gentle slope but generally flat

**Views**

Heavily treed open spaces limit views in and out of the area. There are glimpses of the wider landscape at the edges where there are intermittent breaks in vegetation

**Overall Assessment**

Mixed use area comprising of residential and hospital buildings.

Mix of housing types including houses and flats of varying heights up to four storeys. There are a number of larger building footprints in area (reflecting hospital buildings in the area).

Open areas are interwoven in the area, with a larger open area at the north-west part of the site.

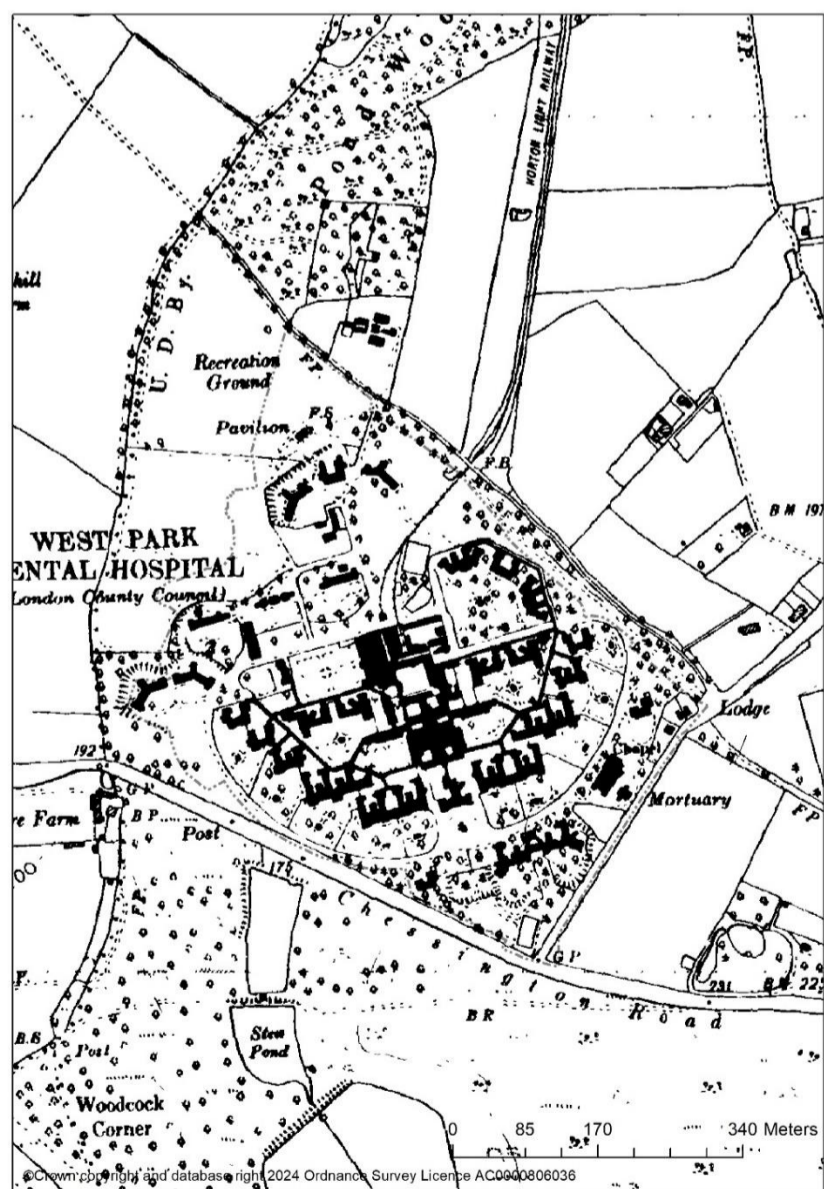
The boundary of the area is heavily treed with limited distant views.

**Score**

L. Whist fairly low density, there are a mixture of housing types including flatted development up to four storeys and other non-residential uses on the site. Set within a parkland setting but most of the open area is on the perimeter.

**Recommendation**

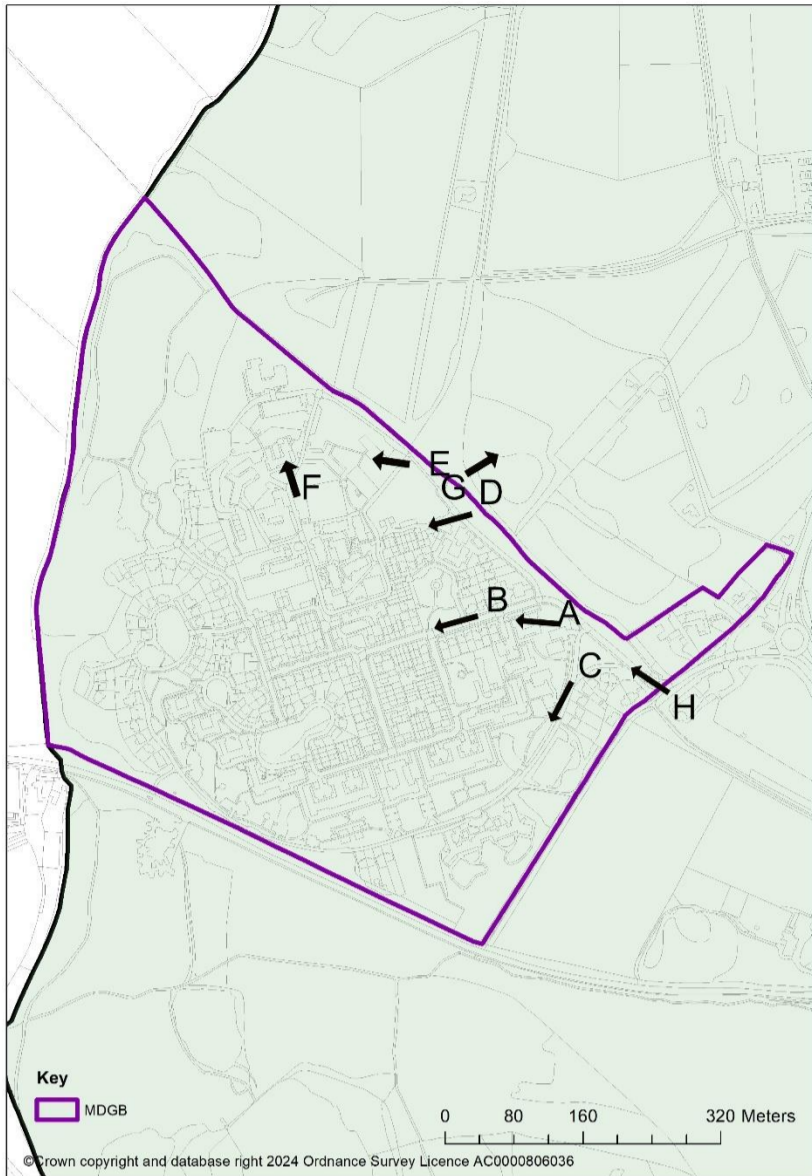
Consider inseting the built up area to take into account recent development



Historic map (1938) of the former West Park hospital



Historic aerial photo of the former West Park hospital



Annotated Plan



Current aerial photo of West Park area



A. View looking north/west from the east of Richmond Crescent Road



B. View looking down Sherwood Way towards Grade II water tower. The photo captures the generous spacing between buildings in some parts of the site



C. View looking south down Richmond Crescent Road. Large footprint, three storey buildings.



D. Buildings at the eastern side of Sherwood Way, large footprint buildings.



E. Single storey NHS buildings located north of the area



F. Two storey NHS building north of the area. Most of the other NHS buildings to the north are single storey except this one



G. Glimpse of the wider landscape from West Park Road towards the East



H. Entrance to West Park

**Site 42\_001 NESCOL**

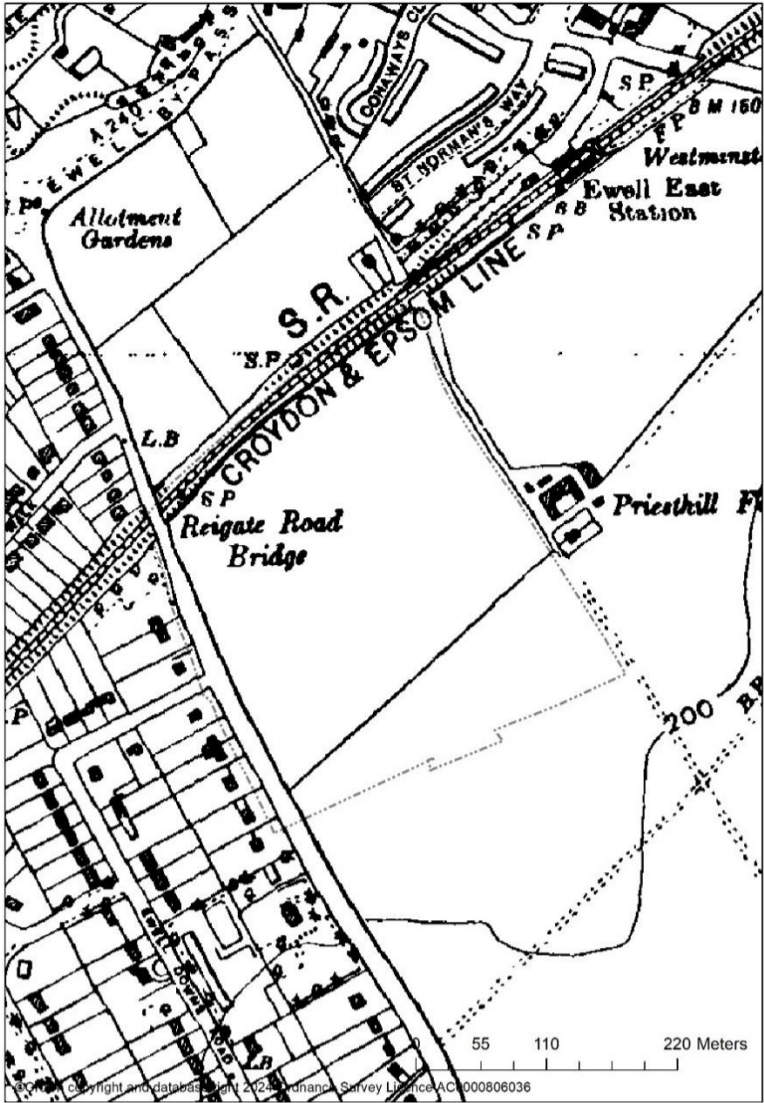
3.16 NESCOL is currently allocated in the boroughs adopted development plan as a Major Developed Site within the Green Belt. NESCOL (North East Surrey College of Technology) is a further education establishment located on the edge of settlement. Its primary role is as a further education establishment for adults. In addition, the campus consists of sports pitches, gym, day nursery, theatre and beauty salon. The site falls within Parcel 42 and has an overall score of 5

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



Percentage of the site	Percentage	Area (ha)
<b>Buildings</b>	14.55 %	2.09
<b>General Surface</b>	25.56 %	3.67
<b>Natural Environment</b>	56.34 %	8.09
<b>Path</b>	0.35 %	0.05
<b>Roads</b>	3.20 %	0.46

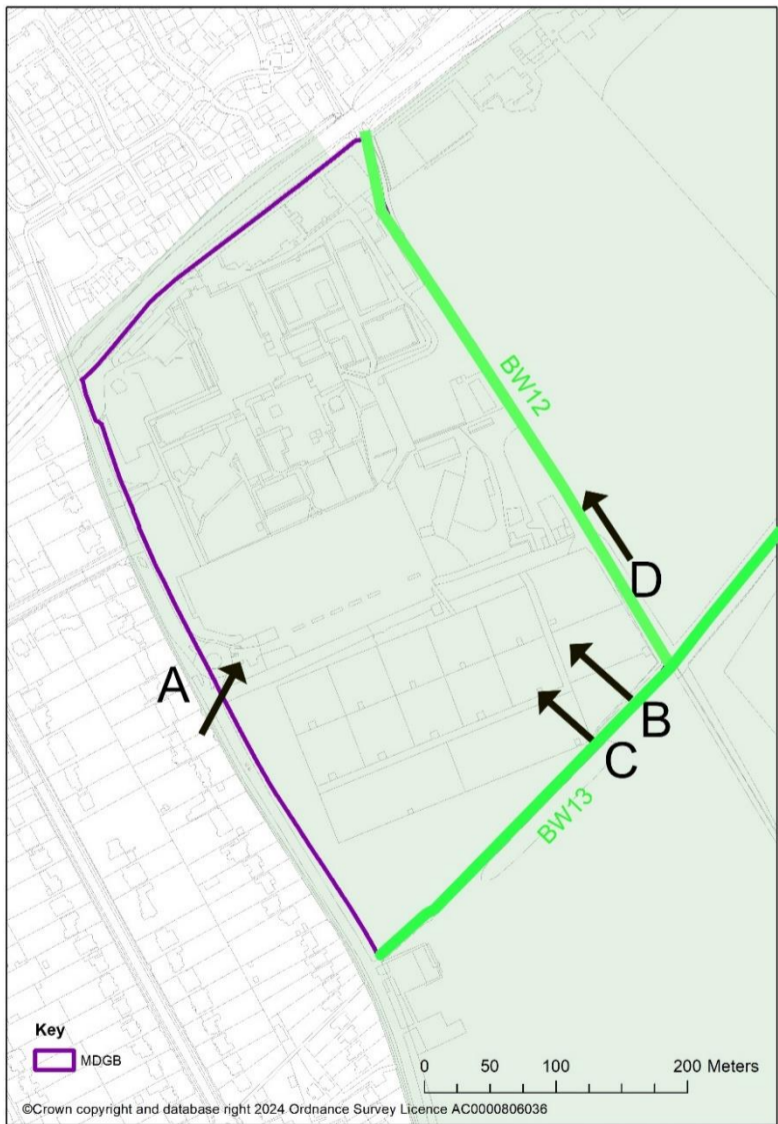
<b>Existing uses</b>
NESCOL Campus, car park and farming fields to the south (used for animal studies)
<b>Total Area of this MDS</b>
14.36 ha
<b>Built development</b>
6.27 ha (comprising of buildings, paths roads and general surface). The northern part of the site consists of the main campus buildings, surface car park and amenity green space are located centrally. The farm facilities predominantly located on the southern field. Approximately 43.66% of the area is built up including surface parking and the remaining area 56.34% is open green space comprising amenity greenspace and the field south
<b>Building heights and footprint</b>
Large footprint educational buildings of varying building heights, the tallest building is the approximately 5 storeys
<b>Enclosures</b>
Enclosures including iron railings/wire fencing in combination with a well vegetated edge around the college grounds. Railings and hedge along the southern boundary next to the car park terminates the built up area. The southern farming field is surrounded by tree/hedge boundary. The field is divided by agricultural enclosures and animal pens. The northern boundary is a railway line, with a railway station Ewell East NE of the site
<b>Topology</b>
Generally flat
<b>Views</b>
Well vegetated boundary limit views in and out but there are breaks in the vegetation that allow for glimpse in and out.
<b>Overall Assessment</b>
Fairly flat and the site is well screened but glimpse into the site visible from all boundaries, it is most exposed along Reigate Road. The grounds of the college has an urbanised character although well landscaped, amenity green space dispersed amongst the buildings. The southern part becomes completely open with agricultural/educational uses.
<b>Score</b>
L, the built up part to the north of the site is urban in character
<b>Recommendation</b>
Consider insetting to better reflect the extent of the built area



Map of NESCOT 1938



Historic aerial photo of NESCOT



Annotated Map



Current aerial photo



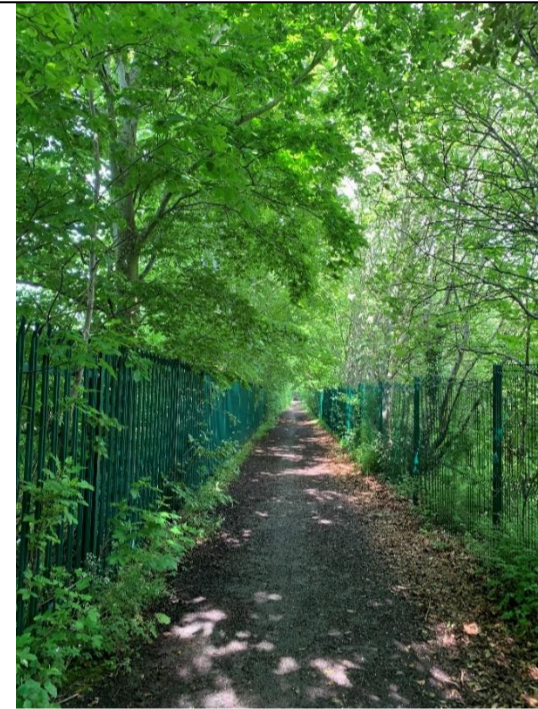
A. NESLOT view from the roundabout from Reigate Road, south/west corner of the car park



B. View of the agricultural field over the wire fencing.



C. View of the agricultural field from bridleway (BW13) running south of southern edge. The fields are used by the College's for animal care courses



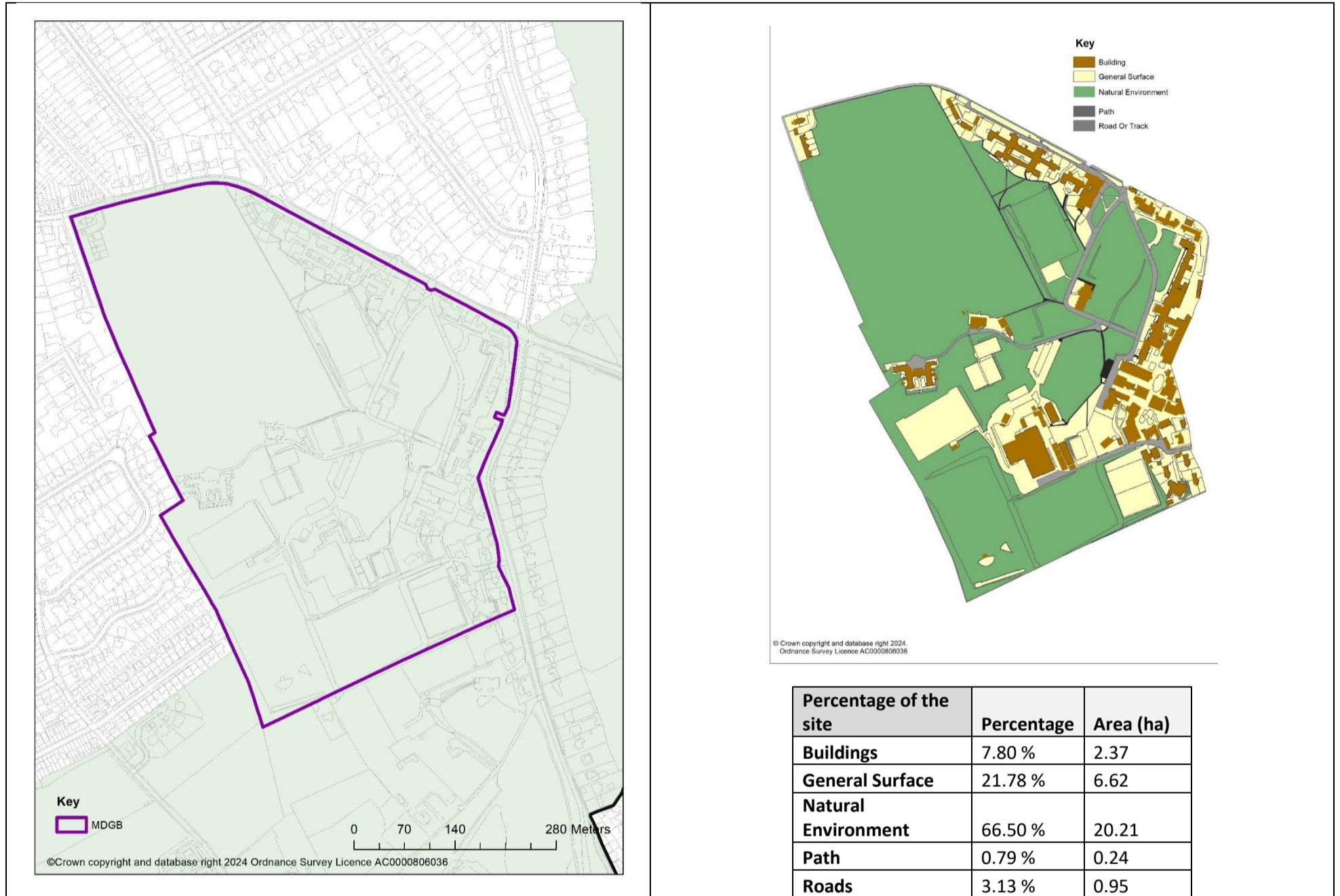
D. View north along bridleway 12, Nescot located to the west of the Bridleway and playing fields to the east.



**Site 36\_001 Epsom College**

3.17 Epsom College is currently allocated as a Major Developed Site within the Green Belt. Epsom College is a private Independent School for the 11+ age group and upwards. It is located on the edge of settlement. The grounds includes historic buildings, chapel, numerous sports pitches and fields. The site falls within Parcel 36 and has an overall score of 4.

Parcel ID	Site Description	Purpose 1 Score	Purpose 2 Score	Purpose 3 Score	Overall score
P36	Land at Epsom College	1	2	1	4

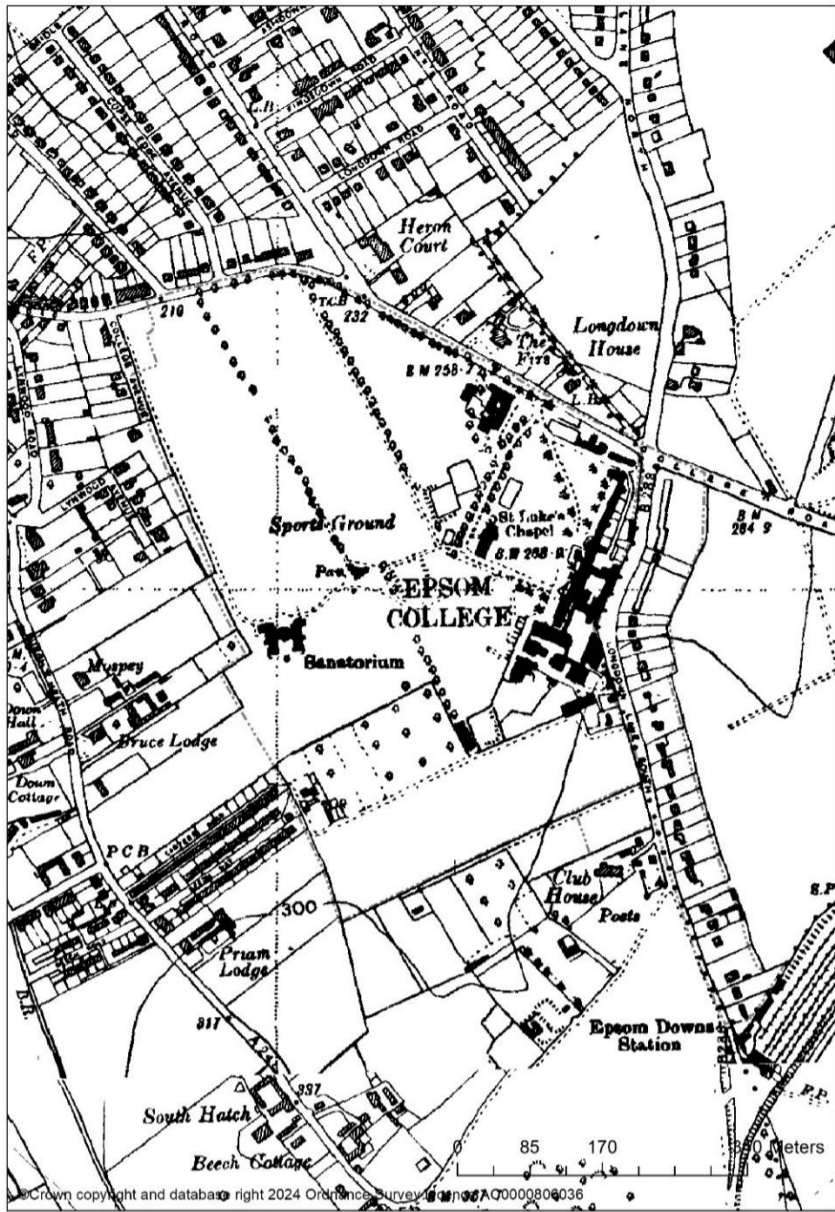


<b>Existing uses</b>
Independent school for 11+ age group. Large grounds containing educational buildings including boarding houses and numerous sports pitches and fields.
<b>Total Area of MDS</b>
30.39 ha
<b>Built development</b>
10.18 ha (comprising buildings, paths, roads and general surface). Most of the buildings are located along the northern and eastern edges of the site adjoining College Road and Longdown Lane South. Some are statutory listed buildings. Approximately 33.5% of the area is built up and the remaining area (66.5%) is open, comprising of various sports fields/pitches and amenity greenspace. The majority of the open fields are contained behind /within the built up boundary.
<b>Building heights and footprint</b>
Varying heights, prevailing height 2-4 storeys. The tower of the main building approximately 5 storeys. Educational establishment with mainly large footprint buildings. There are a few small footprint, domestic semi detached properties to the N/W and S/E
<b>Enclosures</b>
The campus is surrounded by a high brick wall (along Longdown Lane south), fence or railings and a meter high hedge along College Road.
<b>Topology</b>
Generally flat.
<b>Views</b>
The college buildings and high brick wall along Longdown Lane South have a significant presence here.
There are clear views of the grounds from College Road over the hedge and through the open sports fields. The open aspect allows for clear views south towards the distant Epsom Downs. Other prominent views via the main entrance and along the boundary where there are railings and breakages in the vegetation. There is a strong building line along the two roads where the central part of the site is mainly open. The site is large and appears to sprawling but is contained/hemmed in by the educational buildings on the edge. The site is fairly flat with views of Epsom Downs to the south. College Road further east is on higher ground and the College buildings can be seen on approach to the junction of College Road and Longdown Lane North and South.
<b>Overall Assessment</b>
Private school campus, large, sprawling site . Buildings are located on the edges hemming in the open fields/pitches in the centre. Large footprint buildings vary in height and style. The buildings are prominent, particularly along Longdown Lane South. The open fields allow for distant views of Epsom Downs to the South
<b>Score</b>

M. Whist the edge is built up with a strong building line, the central part of the site is open and allows for longer views to the south.

**Recommendation**

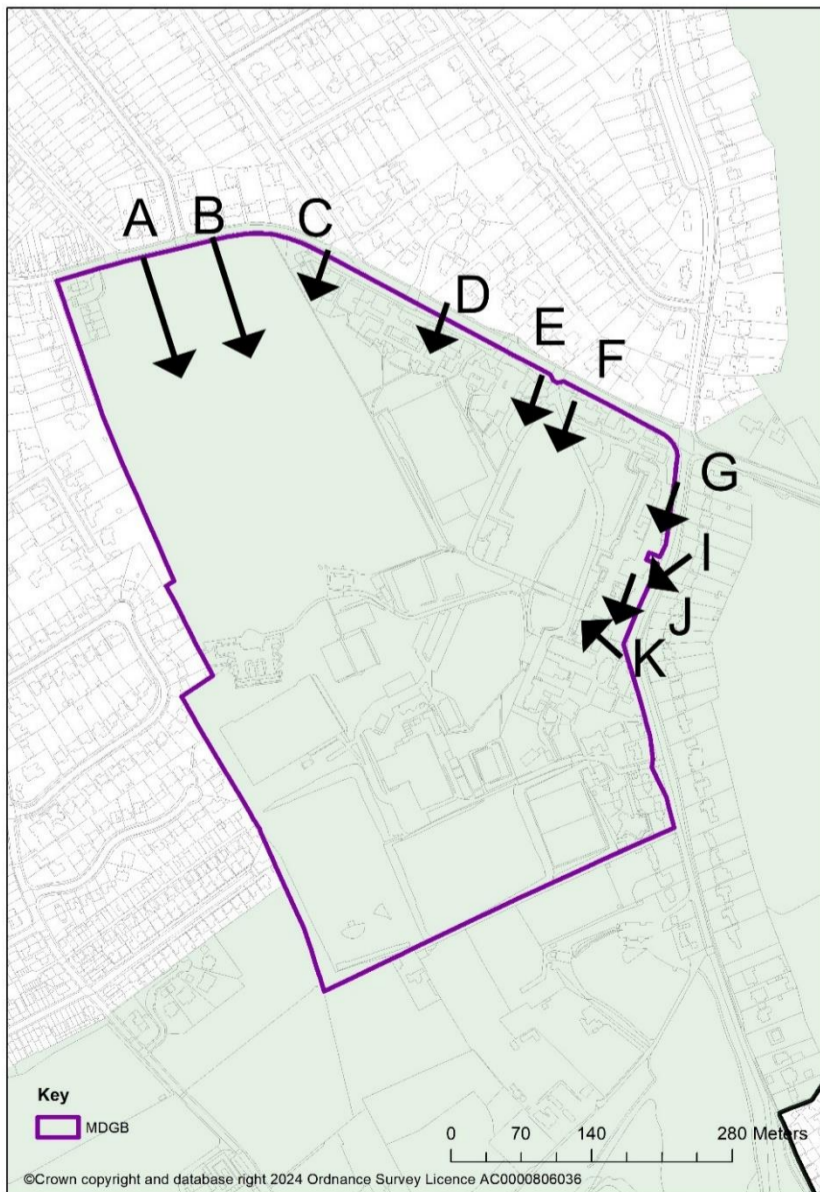
There is a case for retaining the site in the GB because of the layout makes it difficult to inset the built up part from the open part. Alternatively would have to consider inseting the whole site.



Historic map (1938) of Epsom College



Historic aerial photo of Epsom College



Annotated Map



Current Aerial Photo of the site



A. View from College Road looking south towards Epsom. There are railings and a low hedgeline that allow for open views through the site



B. Views south from College Road. Distant views of Epsom Downs visible. Historic tree line running north south remain in tact



C. Domestic buildings at the northern tip of College Road, where the road bends.



D. Back entrance from College Road



E. Main entrance from College Road- Looking East



F. Main Entrance from College Road- Looking north



G. View south down Longdown Lane South.



I. View south down Longdown Lane South. College buildings dominate the townscape



J. View south down Longdown Lane South



K. View North along Longdown Lane South

### Former Hospital Cluster

3.18 These are the areas that were former hospitals, located to the North West part of the Borough. These were allocated in the 1996 Local Plan and carried forward to later Local Plans. We will look at each of the former hospital groups individually.

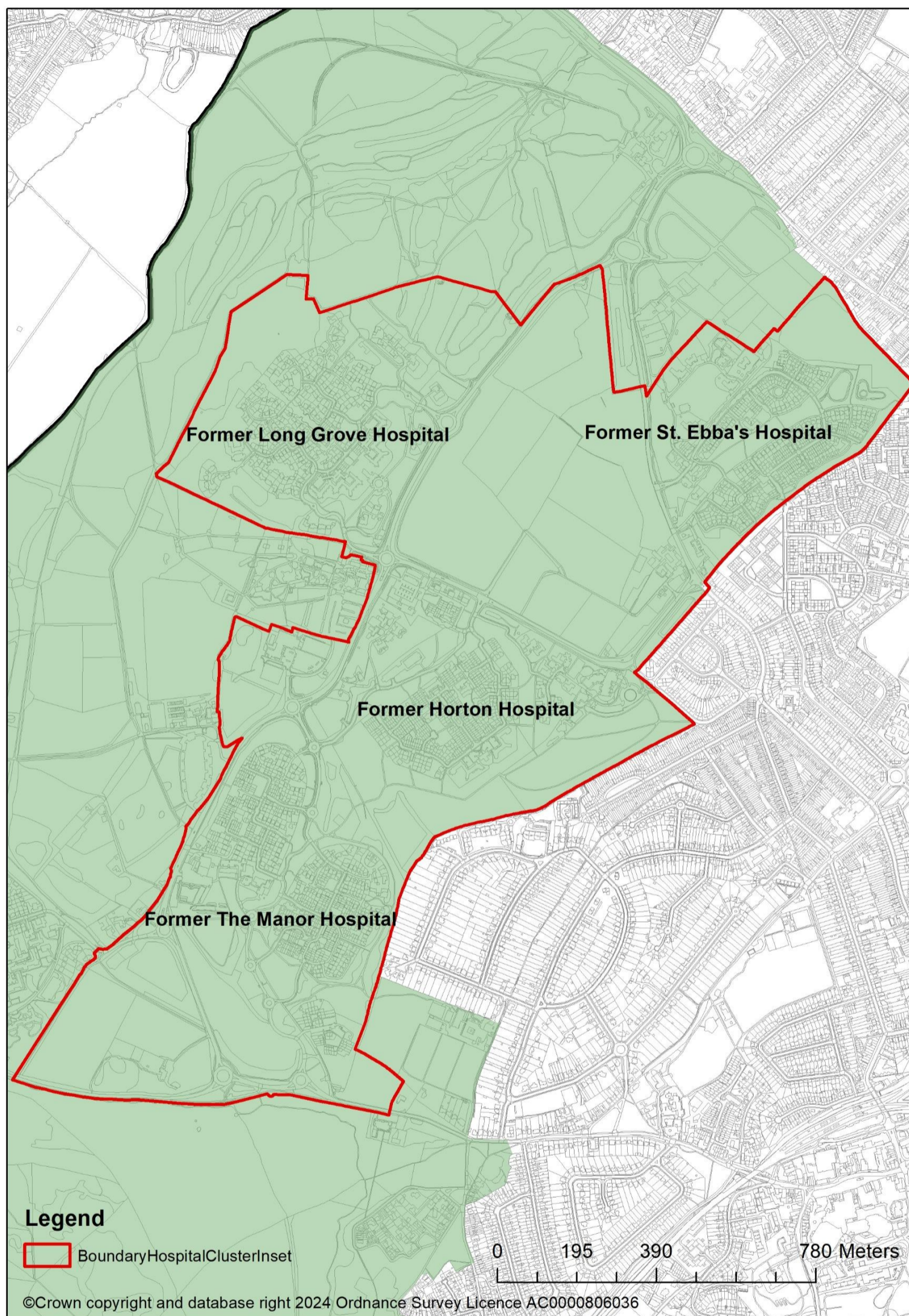


Figure 2 Map of the Former Hospital Cluster

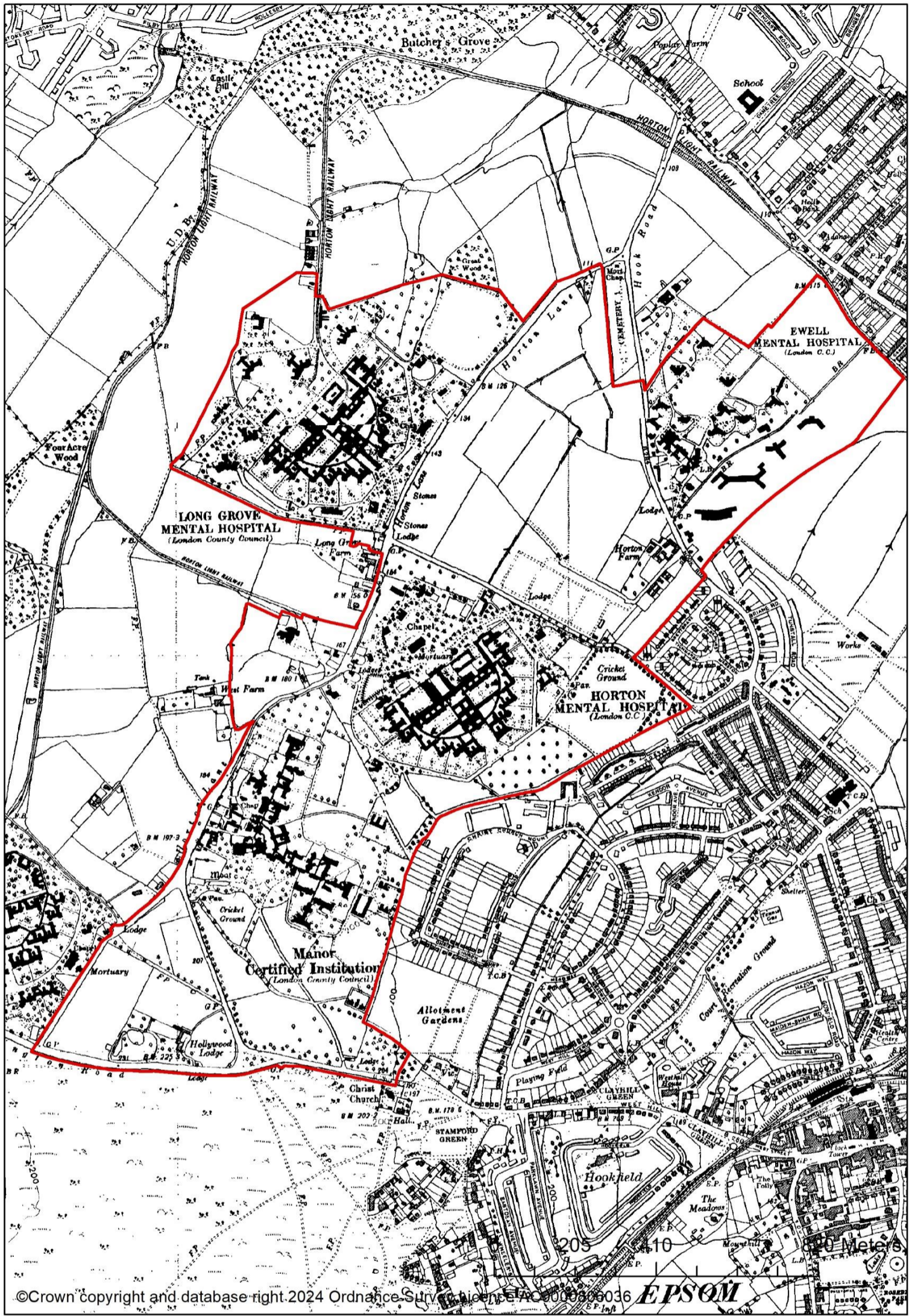
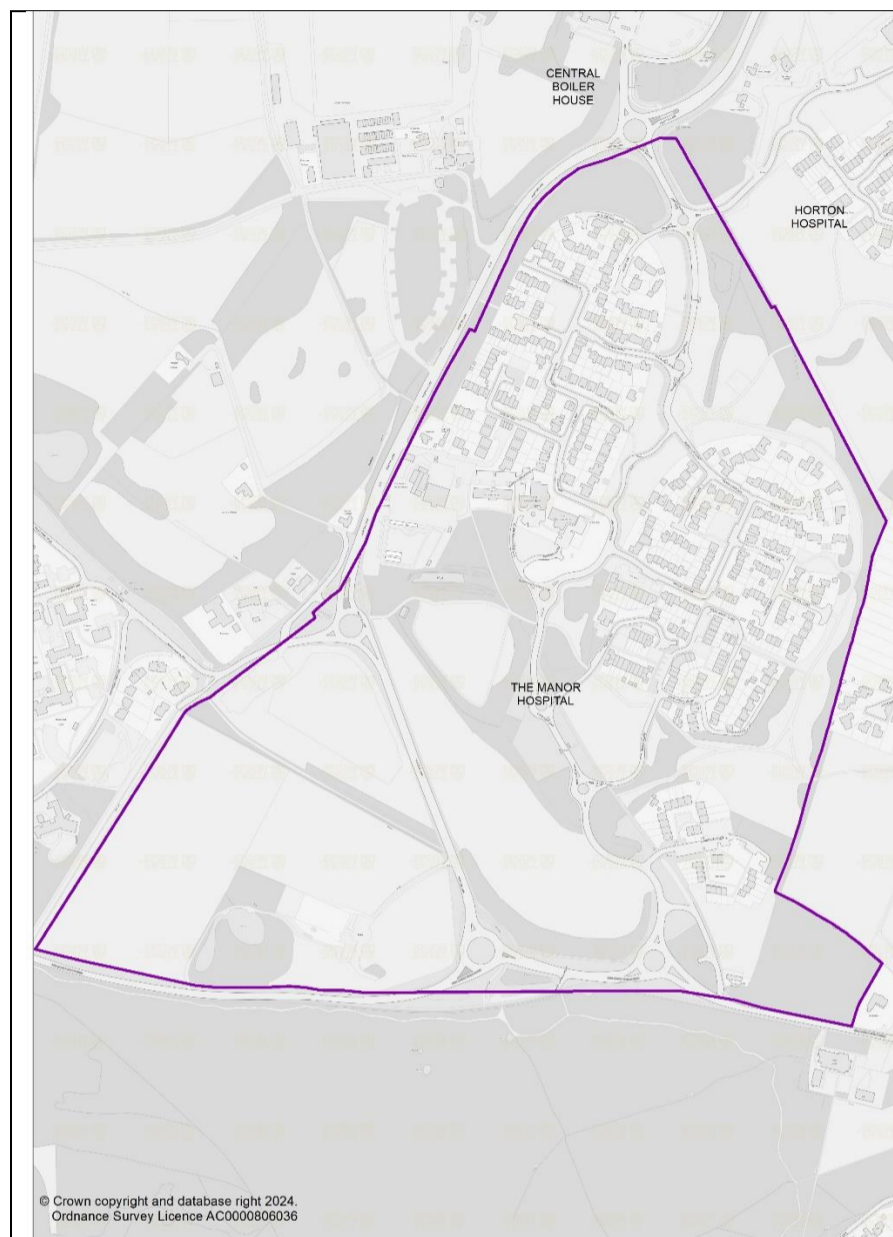


Figure 3 Historic map of the former Hospital Cluster

**Site 22\_001 Manor Park (Former The Manor Hospital)**

- 3.19 Residential area split into two distinct areas and surrounded by open space. The Manor Hospital was described as being developed in an ad hoc manner which might explain the sprawling nature to it. The open space and trees were also noted of value as well as a medieval moated area (site of archaeological importance).
- 3.20 The site falls within Parcel 22 and has an overall score of 1.

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

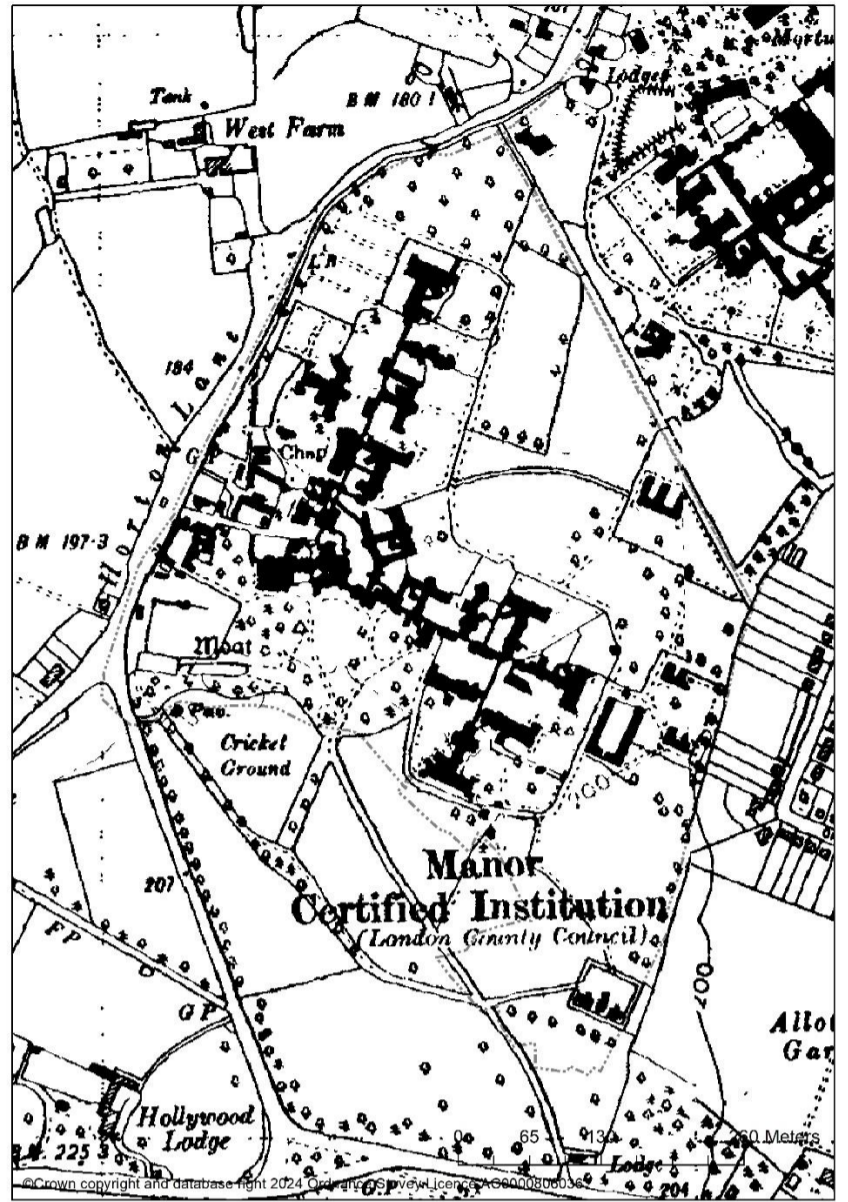


Percentage of the site	Percentage	Area (ha)
<b>Buildings</b>	5.33	3.15
<b>General Surface</b>	16.44	9.72
<b>Natural Environment</b>	60.06	35.52
<b>Path</b>	1.94	1.15
<b>Roads</b>	16.23	9.6

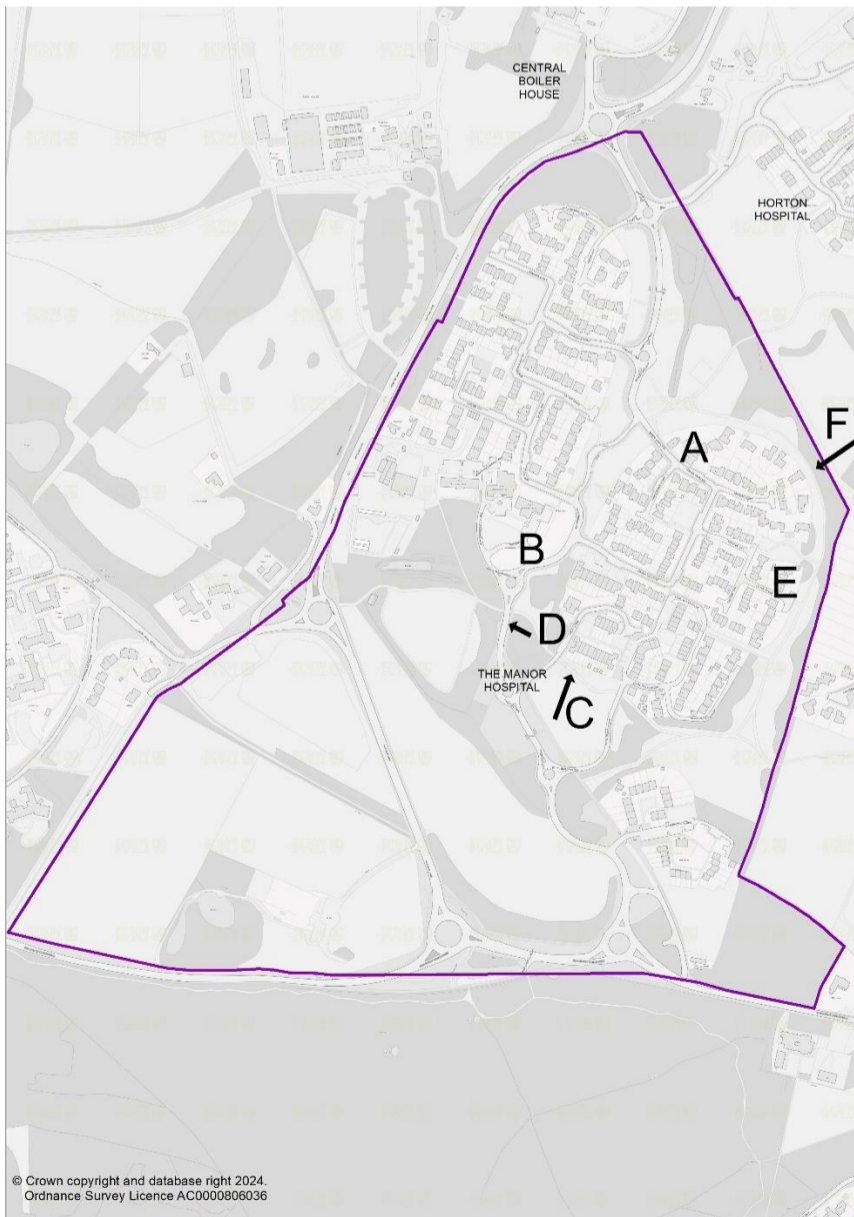
<b>Existing uses</b>
Residential area set within open space
<b>Total Area of this hospital cluster</b>
59.14 ha
<b>Built development</b>
23.62 ha or 40% (comprising of buildings, paths, roads and general surface). Most of the buildings are concentrated into two distinct sections surrounded by open space with an arterial road separating the areas which connects to Livingstone Park (another hospital cluster) to the north. Approximately 40% of the area is built up and the remaining area 60% is open space, amenity green space, parkland, grounds of large private property mainly garden land/Parkland (Hollywood Lodge) and allotments.
<b>Building heights and footprint</b>
The prevailing height is 2 storeys. With a mixture of terraces, semi detached, and detached properties on modest plots. There are also some historic buildings of larger footprint that have been converted into flats in the area (in Pheonix Close). The average density of the built up area is 22.18 dph.
<b>Enclosures</b>
Domestic enclosures fences, walls, vegetation. The edge of the built form is heavily vegetated with woodland paths.
<b>Topology</b>
Gently sloping
<b>Views</b>
Most of the open areas are heavily treed which limits views in and out the area. Paths along the edges and central road are also well vegetated and screened, allowing for glimpses into the residential area through various informal and formal gaps.
<b>Overall Assessment</b>
Residential area separated by central green ribbon and road. Surrounded by open space. Open space makes up 60% of the area, mainly on the edges and south. Built up area is on average 22 dph.
<b>Score</b>
L. Whist fairly low density, there are a mixture of housing types including flatted development up to three storeys. Set within a parkland setting but built up area concentrated in two parcels which are urban in character, most of the open area is on the perimeter and to the south
<b>Recommendation</b>
Consider insetting taking into account recent development



Historic aerial photo former Manor Hospital



1938 Map of the former Manor hospital area



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Current aerial photo of Manor Park





A. View from Nightingale Close



B. View of Pheonix Close on the western parcel of the former hospital site. Converted historic building



C. Views of residential development on the eastern parcel from the south, near Helm Close.



D. Avenue planting along pathways located near Helm Close



E. Residential found units located in the eastern parcel



F. Gaps through the vegetated boundary leading to the residential parcel (eastern side) from the wooded footpath on the edge

**Site 25\_001 Livingstone Park (Former Horton Hospital)**

3.21 Residential area, with school, local shops and The Horton (cultural/arts venue) surrounded by open space. The original hospital was an integrated building complex which broadly grouped around a semi-circular corridor arrangement. This is reflected in the footprint of the site now which retains that semi-circular shape. The integrated complexes were noted to be of some architectural merit. The Horton Chapel is a listed building.

3.22 The site falls within Parcel 25 and has an overall score of 1.

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

**Key**

- Building
- General Surface
- Natural Environment
- Path
- Road Or Track

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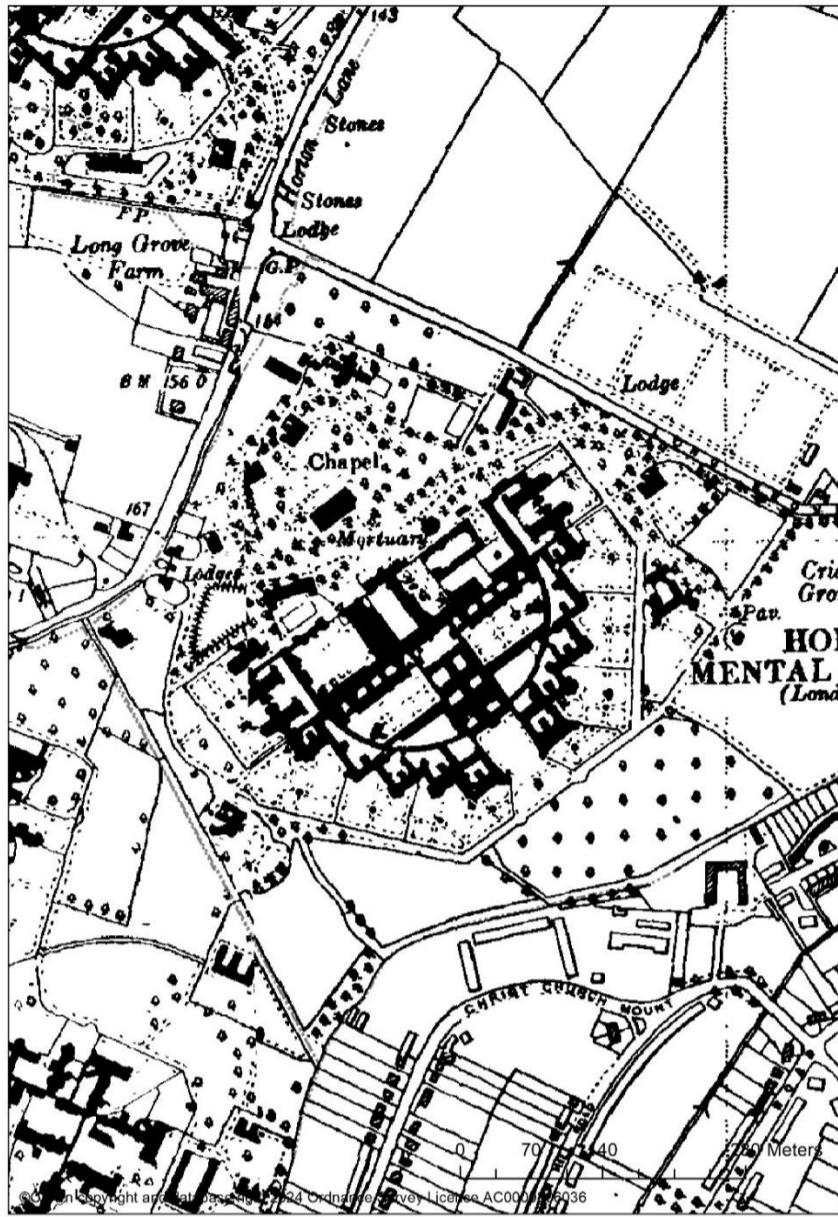
Percentage of the site	Percentage	Area
<b>Buildings</b>	8.35	3.25
<b>General Surface</b>	17.81	6.93
<b>Natural Environment</b>	63.21	24.6
<b>Path</b>	3.47	1.35
<b>Roads</b>	7.17	2.79
	100.00	38.92

<b>Existing uses</b>
Mixed use including Residential area, small shopping area, The Horton (Arts Centre) School and open space to the south
<b>Total Area of this hospital cluster</b>
38.92 ha
<b>Built development</b>
14.32 ha or 37% is built development comprising of buildings, paths, roads and general service. Most of the buildings are concentrated in the central horse shoe, which is surrounded by open space. Approximately 37% of the area is built up and the remaining area 63% is open comprising of Long Grove Park and surrounding semi natural open space
<b>Building heights and footprint</b>
A range of building types, styles and heights reflecting the mix of uses here. A mixture of 2-3 storey houses, mainly in terraces but also semi detached and detached units in the area and 3-3 1/2 storey flats. Larger footprint buildings to the south (eg Horton Crescent) The average density of the built up area is 79 dph.
<b>Enclosures</b>
Domestic enclosures, mainly hedges and brick walls
<b>Topology</b>
Gently sloping
<b>Views</b>
Limited views within the estate. Short distant views along the edges, where it is more open but this is limited to views of the parkland grounds rather than the wider landscape. The boundary of the area is heavily treed limiting long distant views.
<b>Overall Assessment</b>
Central residential core with some local shops, community facility and school on the edge and significant areas of open space on the edge. Approximately 60% of area is open space. The site is generally self contained and the heavily vegetated boundary limit views in and out.
<b>Score</b>

L. High density built up area, with a mixture of housing types including a large proportion of flatted development up to three storeys. Set within a parkland setting but built up area concentrated in the centre which are urban in character, most of the open area is on the perimeter.

**Recommendation**

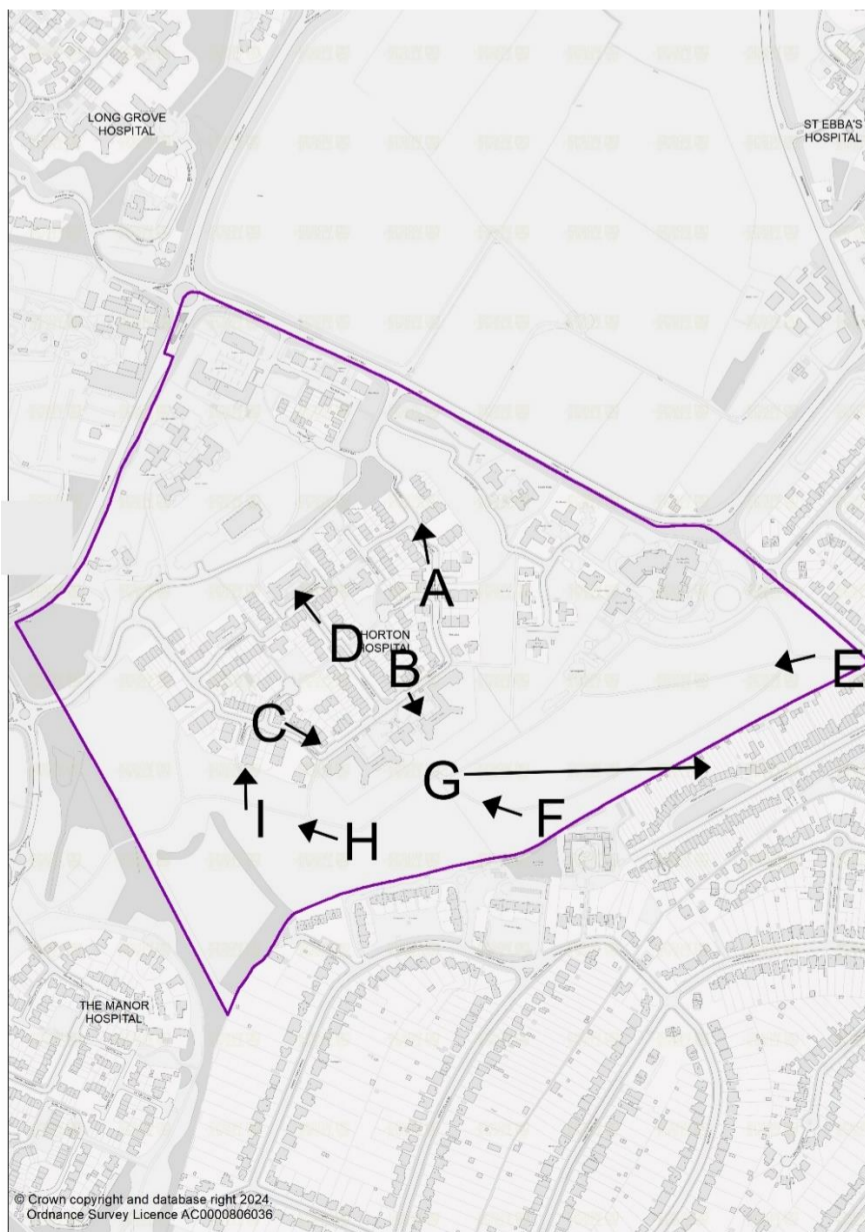
Consider inseting taking into account recent development



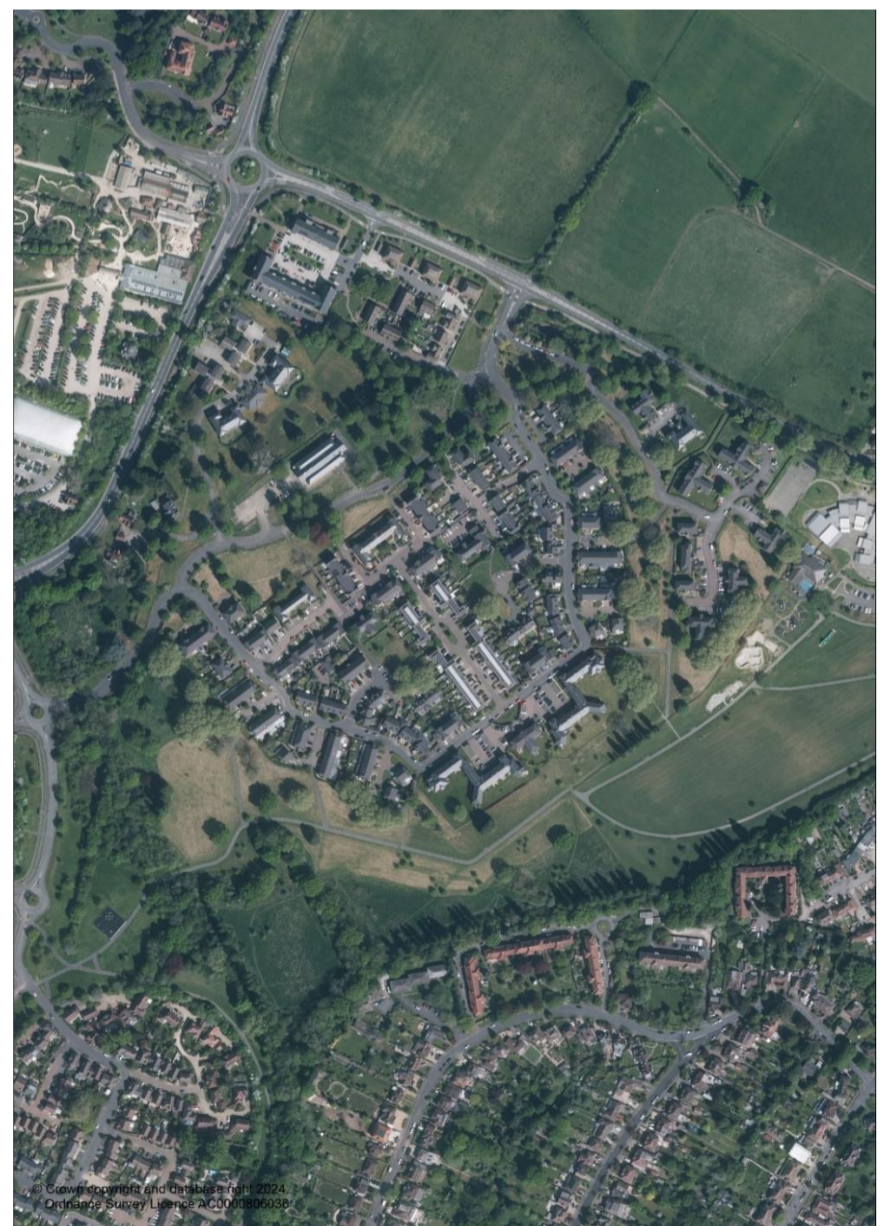
Historic Map (1938) of the former Horton Hospital



Historic aerial photo of the former Horton Hospital



Annotated Map (Insert Horton Hospital Ano Map from one drive)



Current aerial photo of Livingstone Park



A. Detached properties along Horton Crescent (East)



B. Larger footprint buildings southern part of Horton Crescent (central)



C. Detached and Semi detached properties along Horton Crescent (West)



D. Mainly 3 storey terraces along Cavendish Walk



E. Long Grove Park to the South of the area



F. View of the redeveloped Horton Hospital from Long Grove Park



G. View from the N/W corner of Long Grove Park facing SE towards the Downs



H. Paths along the Southern part of Livingstone Park adjacent Long Grove Park



I. View of residential development in Livingstone Park from green space to the south



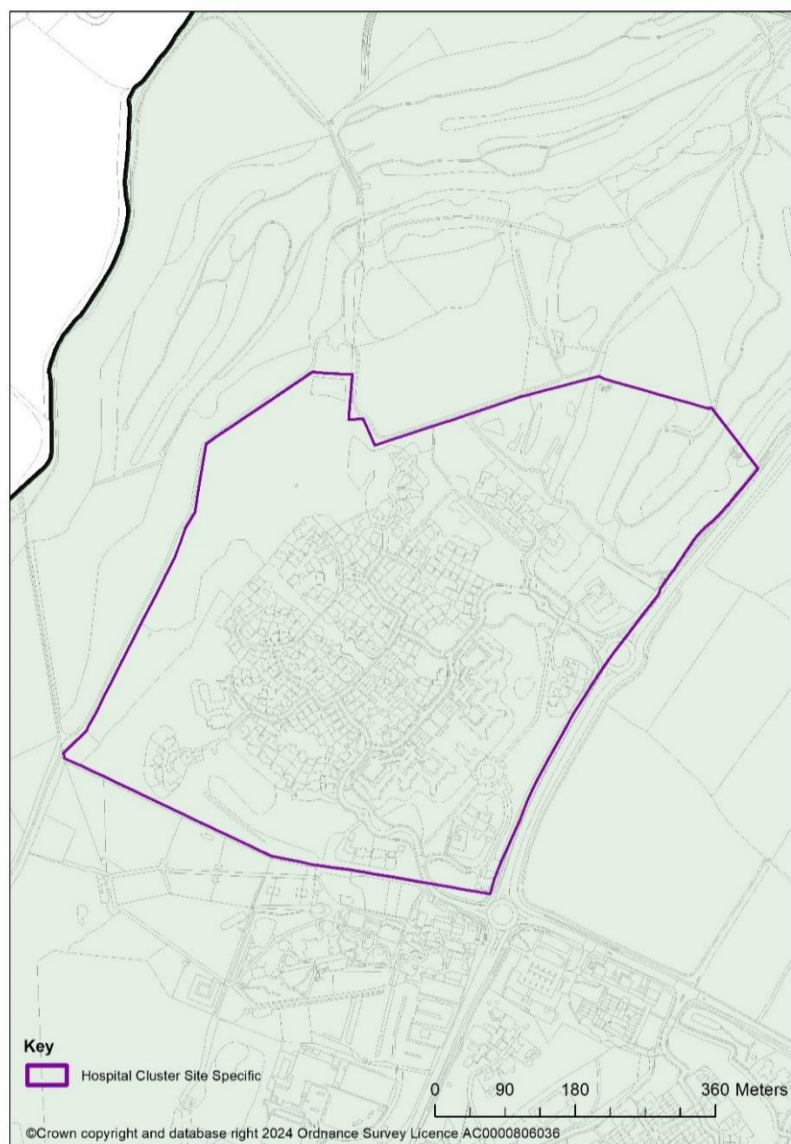
J. Paths through semi natural greenspace to the south of the site

**Site 27\_001 Clarendon Park (Former Long Grove Hospital)**

3.23 Residential area surrounded by open space. Similar to the former Horton Hospital site, the original hospital was an integrated building complex which broadly grouped around a semi-circular corridor arrangement. This is reflected in the footprint of the site now which retains that semi-circular shape. The site was noted to have extensive tree cover.

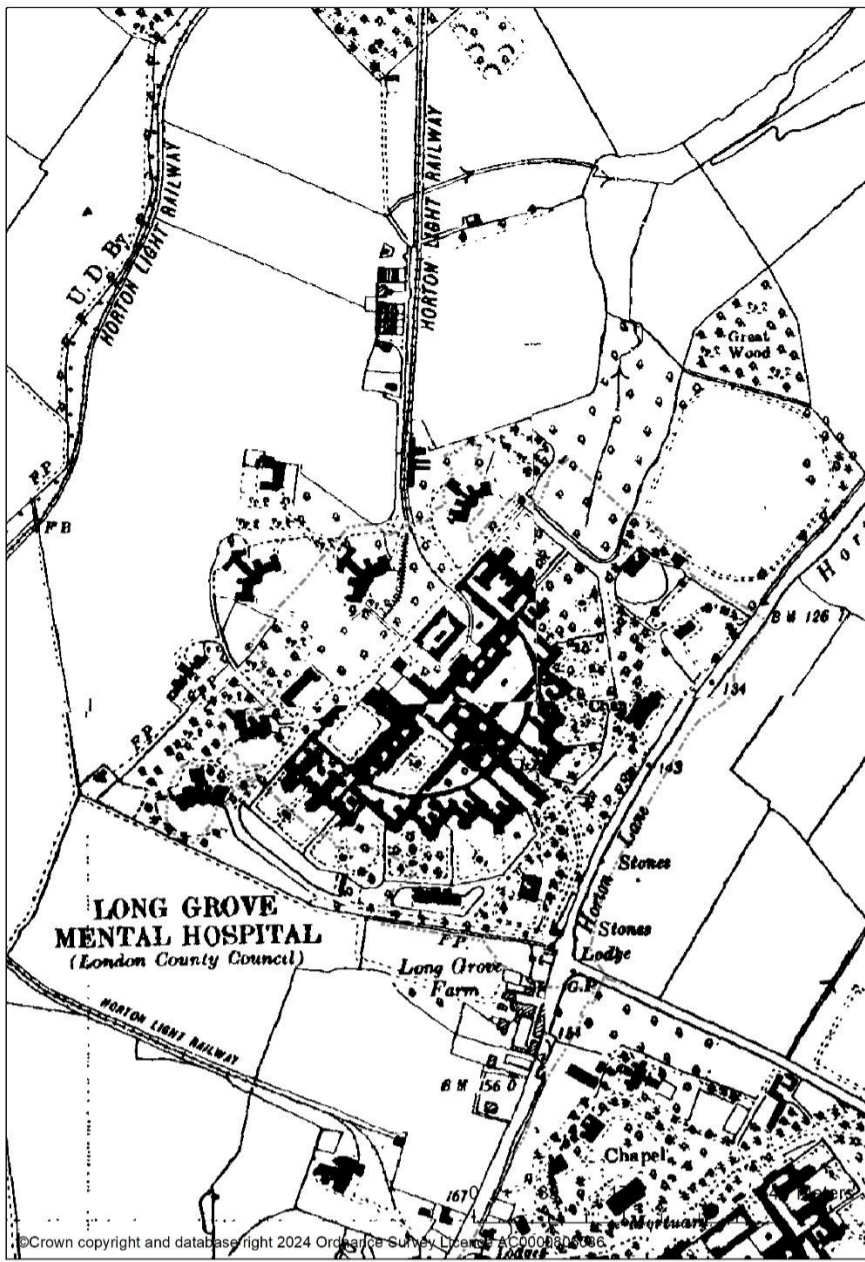
3.24 The site falls within two parcels, Parcel 23 and Parcel 27

Parcel ID	Site Description	Purpose 1 Score	Purpose 2 Score	Purpose 3 Score	Overall score
P23	Land at Horton Country Park and Horton Park Golf Club	3	3	3	9
P27	Land at Clarendon Park (Long Grove former hospital site)	0	0	1	1



Percentage of the site	Percentage %	Area (ha)
<b>Buildings</b>	6.94	3.13
<b>General Surface</b>	23.02	10.38
<b>Natural Environment</b>	63.30	28.54
<b>Path</b>	1.42	0.64
<b>Roads</b>	5.32	2.4
	100.00	45.09

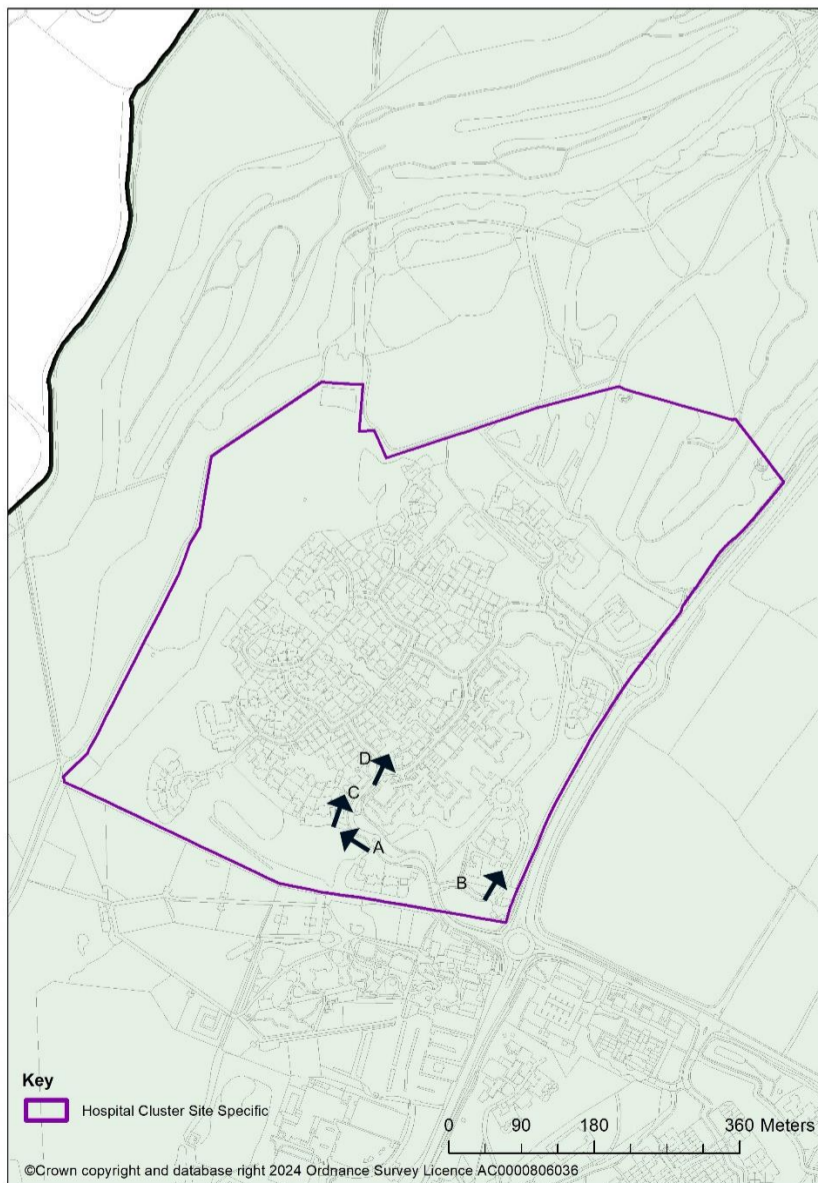
<b>Existing uses</b>
Residential area within parkland setting
<b>Total Area of this hospital cluster</b>
45.09 ha
<b>Built development</b>
16.55 ha is built development comprising of buildings, paths, roads and general surface (which includes gardens). Most of the buildings are concentrated in the centre, mostly detached units but there are some terraces and flatted development detached plots on the edges surrounded by open space on the edges. Approximately 37% of the area is built up and the remaining area 63% is open space, parkland and golf course.
<b>Building heights and footprint</b>
The character of the area varies. The prevailing height is 2-3 storey. There are detached houses along South View and townhouses with some flatted development (along Sandy Mead). Development on large more substantive plots and wide, winding roads along John Watkins Close. The average density of the built up areas is approximately 21 dph.
<b>Enclosures</b>
Domestic enclosures fences, walls, vegetation. Open space is edged by low timber railings
<b>Topology</b>
Gently sloping
<b>Views</b>
Most of the open areas are manicured and well maintained, heavily treed which limits distant views in and out the area
<b>Overall Assessment</b>
Residential area with pockets of open space mainly on the edges. Treed boundary allow short views within the site but limit views in and out the site. Within built up area, the average density is approx 21 dph
<b>Score</b>
M. Low density built up area, with a mixture of housing types up to three storeys. Set within a parkland setting and built up area concentrated in the centre but sprawls out on the edges, most of the open area is on the perimeter.
<b>Recommendation</b>
Consider inseting taking into account recent development



Historic map of the former Long Grove hospital 1938



Historic aerial photo of the former Long Grove hospital



Annotated Map



Aerial photo of Clarendon Park



A. View along McKenzie Way to the south of the site



B. View along Grove Close, significant open space and vegetation between built up areas.



C. View looking north McKenzie Way



D. View of north of McKenzie Way

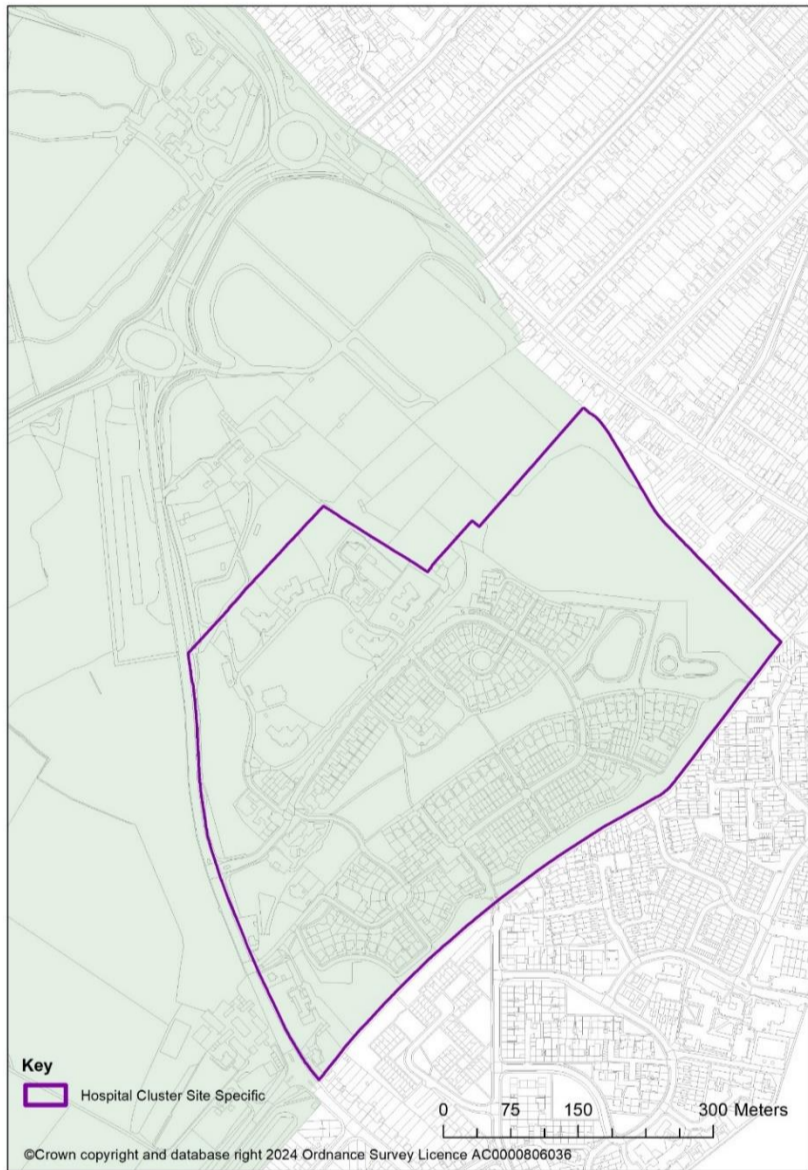


**Site 30\_001 Hook Road Residential (Former St Ebba's Hospital)**

3.25 Residential area surrounded by open space. The north/west part of the site appears to be in NHS use (Surrey and Borders Partnership NHS Trust "Mytime", services for adults 18 and over who are living with a learning disability). The former St Ebbas Hospital was described as being developed in an ad hoc manner, with temporary buildings developed over time where most of the buildings were not of any particular merit. The footprint of the original site is pretty much indistinguishable from the site as it is today.

3.26 The site falls within Parcel 30.

Parcel ID	Site Description	Purpose 1 Score	Purpose 2 Score	Purpose 3 Score	Overall score
P30	Land at St Ebba's former hospital site	0	0	1	1



Percentage of the site	Percentage %	Area (ha)
<b>Buildings</b>	9.97	2.61
<b>General Surface</b>	29.32	7.68
<b>Natural Environment</b>	51.62	13.52
<b>Path</b>	1.57	0.41
<b>Roads</b>	7.52	1.97
	100.00	26.19

<b>Existing uses</b>
Predominantly residential area with green wedge open space/sustainable urban drainage. NHS use of the north/west part of the site. Part of Hook Road Arena open space to the N/E
<b>Total Area of this hospital cluster</b>
26.19 ha
<b>Built development</b>
12.67 ha comprising of buildings, paths, roads and general surface (including garden land). Most of the buildings are concentrated in two diagonal ribbons separated by open space. The open space at the centre is a sustainable drainage system running parallel. To the north/west is a collection of low rise, low density buildings, three of these are located within a small conservation area, they are statutory listed buildings, used by the NHS. Approximately 48% of the area is built up and the remaining area 52% is open green space and parkland
<b>Building heights and footprint</b>
A mixture of 2 storey semi detached houses, 3 storey detached town houses and 3 storey flats. A number of retained historic structures and buildings on the site, A 4-4 ½ story tower at Parkview Way (north entrance to the site). The average density of the built up area is approximately 32 dph. The NHS buildings to the north/west are dispersed and generally single storey or 1 ½ storey buildings
<b>Enclosures</b>
Domestic enclosures, hedges, fences, brick walls
<b>Topology</b>
Gently sloping
<b>Views</b>
Views are generally limited to within the estate. The linear open space that bisects the estate allow for some longer views but within the site rather than the wider landscape. The residential buildings are visible from Hook Road, where it is quite open around the two entrances, but otherwise there is a landscape buffer and well vegetated boundary between the site and the fairly busy road here. The site is generally contained, with short distant views within the site, mainly of the parkland grounds.

Glimpses of the site visible from the brideway, although it is densely vegetated and enclosed by metal fencing, with few entrance points. To the east is public open space (known as Hook Road Arena), where the estate is visible and accessible from here.

**Overall Assessment**

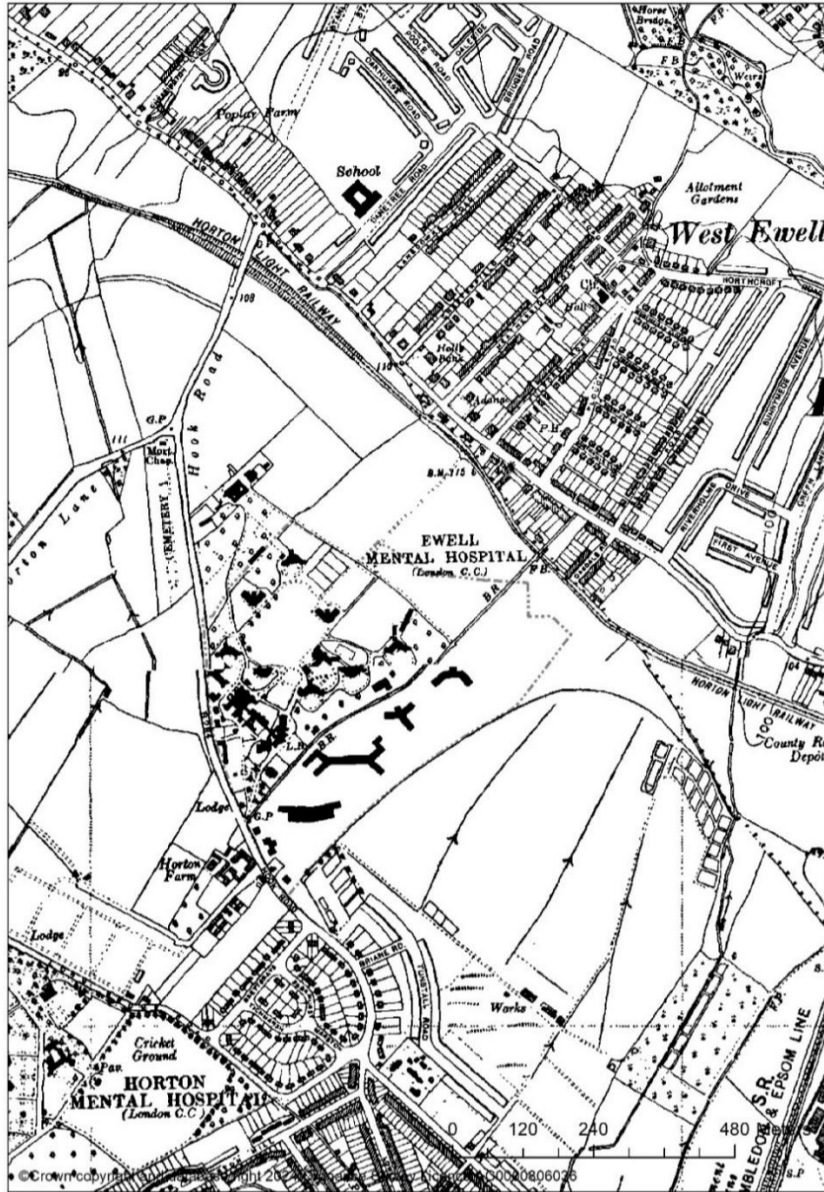
Largely residential with some NHS use to the NW. Green wedge located centrally, cutting through the site east to west. The site is fairly self contained and the heavily vegetated boundary limit views in and out.

**Score**

L. Medium density built up area, with a mixture of housing types but largely detached, semi detached and terrace houses. Set within a parkland setting but urban in character.

**Recommendation**

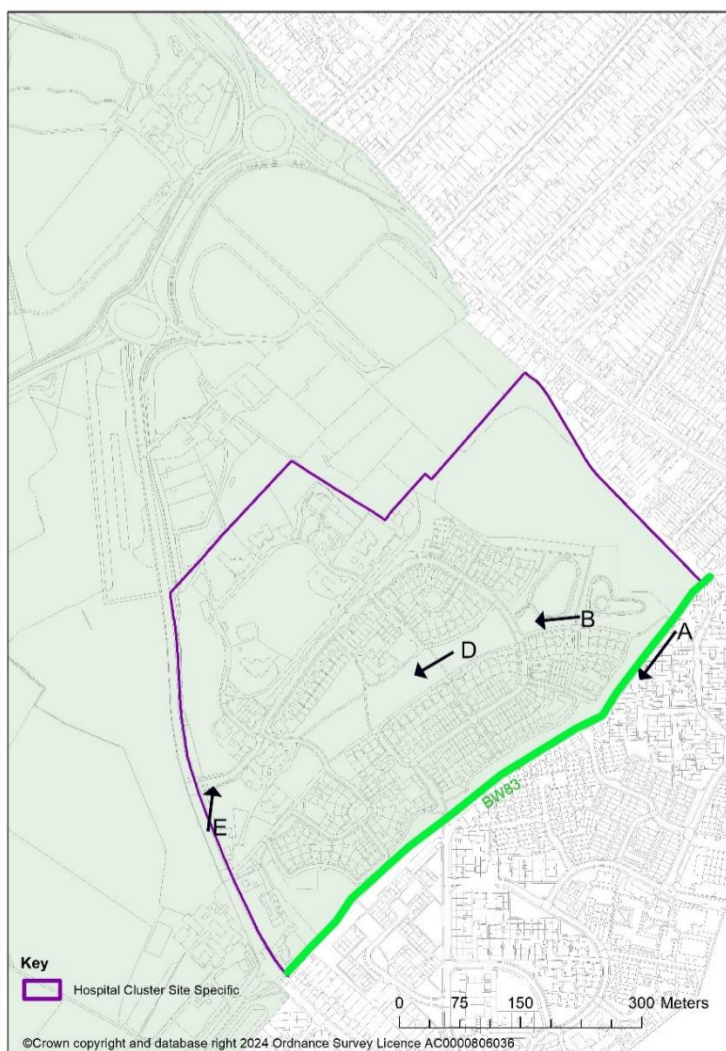
Consider inseting taking into account recent development



Historic Map of the former St Ebba Hospital



Historic aerial photo of the former St Ebbas Hospital



Annotated Map



Aerial photo of St Ebba's



A. Bridleway (BW83) running along the southern boundary



B. View of St Ebba's estate from Maple Close, looking NW



- View of the North Entrance to the site from Hook Road (B284). View of the listed tower



C. View along central open space/ sustainable drainage channel

3.27 On most of the parcels, the degree of openness varies within each parcel, with the built form usually focussed in the centre, so in most cases the potential defensible boundaries could be drawn to ensure open areas remain in the Green Belt. A summary of the assessment is set out below.

Site Name	GBBR Parcel	Sub parcel Reference	Density (dph)	Openness score	Recommendation
West Park Hospital	20	20_001	26	L	Consider inseting taking into account recent development
Epsom College	36	36_001	N/A	M	Difficult to inset only the built up parts of the site. The buildings are concentrated on the edge with open areas located centrally
NESCOT	42	42_001	N/A	L	Consider inseting taking into account recent development
Hook Road Residential (Former St EBBA's Hospital)	30	30_001	32	L	Consider inseting taking into account recent development
Livingstone Park Horton Area (Former Horton Hospital)	25	25_001	79	L	Consider inseting taking into account recent development
Manor Park (Former Manor Hospital)	22	22_001	22	L	Consider inseting taking into account recent development
Clarendon Park (Former Long Grove Hospital)	27/23	27_001	21	M	Consider inseting taking into account recent development

Table 5 Summary of Section 2 assessment

Percentage of the site	West Park	Manor Park (Former Manor Hospital)	Livingstone Park (Former Horton Hospital)	Clarendon Park (Former Long Grove)	St Ebbas	Epsom College	Nescot
<b>Buildings</b>	11.16	5.33	8.35	6.94	9.97	7.80	14.55
<b>General Surface</b>	38.00	16.44	17.81	23.02	29.32	21.78	25.56
<b>Natural Environment</b>	41.43	60.06	63.21	63.30	51.62	66.50	56.34
<b>Path</b>	2.95	1.94	3.47	1.42	1.57	0.79	0.35
<b>Roads</b>	6.47	16.23	7.17	5.32	7.52	3.13	3.20
	100.00	100.00	100.00	100.00	100.00	100.00	100.00

Table 6 Summary of site makeup

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

3.28 Following the first stage of this assessment which looked at whether there was any potential for inseting the Green Belt boundary by assessing whether the areas generally displayed an open character that contributes to the wider Green Belt. The next part of this assessment is to consider where the potential Green Belt boundary line could be drawn. In considering where a defensible boundary could be drawn, physical features that are recognisable and likely to be permanent will be used, these may include the following:

- 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.
- Existing development with strongly established and regular boundaries

3.29 Paragraph 149 of the NPPF states that unless it is necessary to restrict development primarily for its important contribution to the openness of the Green Belt then it should be included in the Green Belt. However, if an area should be protected for other reasons (e.g. conservation area), then other means should be used, and the area should be excluded from the Green Belt. Therefore, for each area we have looked at what other designations exist and whether these offer more appropriate protection than the Green Belt designation for these areas.

3.30 As with the first stage of this assessment each area will be assessed individually.

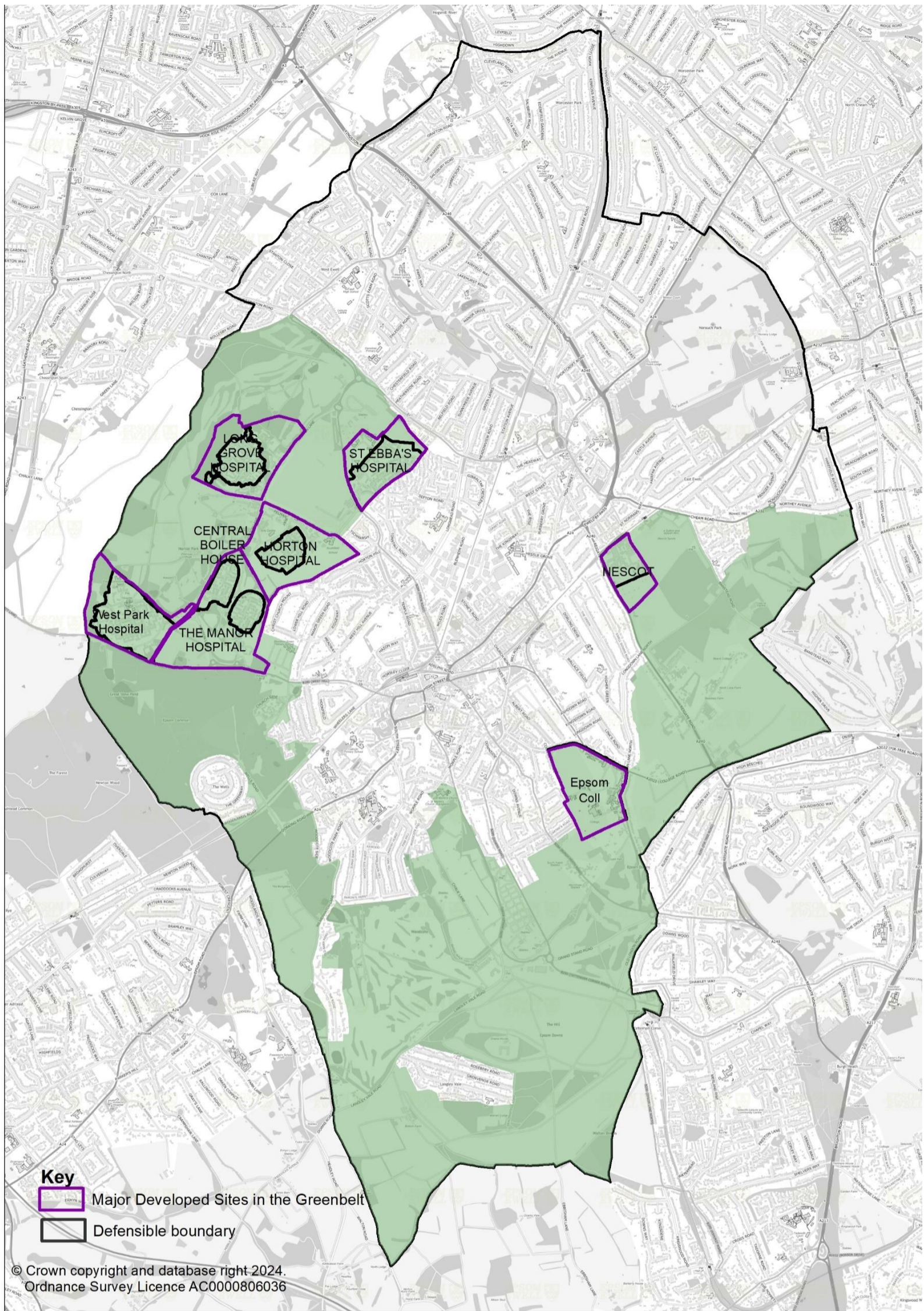
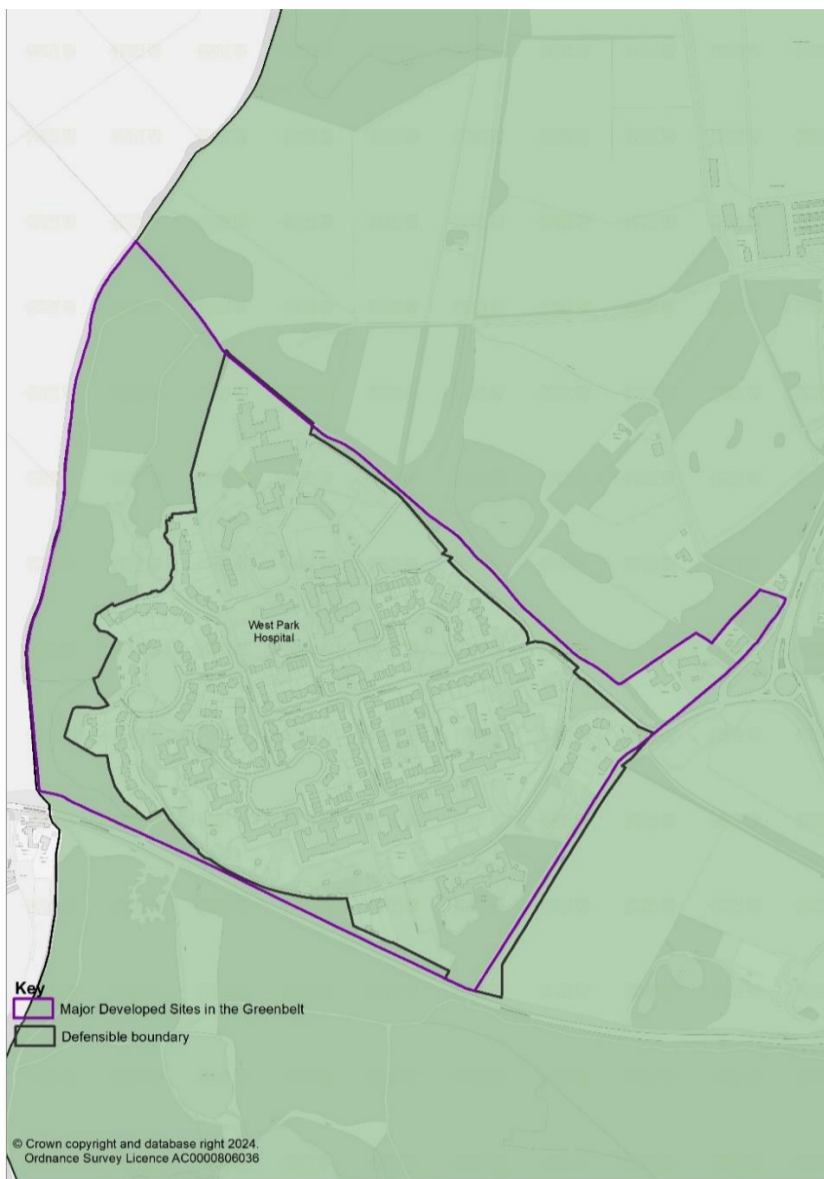


Figure 9 Map showing potential defensible boundary for MDS and Hospital Cluster

Site 20\_001 West Park, Hospital



Proposed defensible boundary

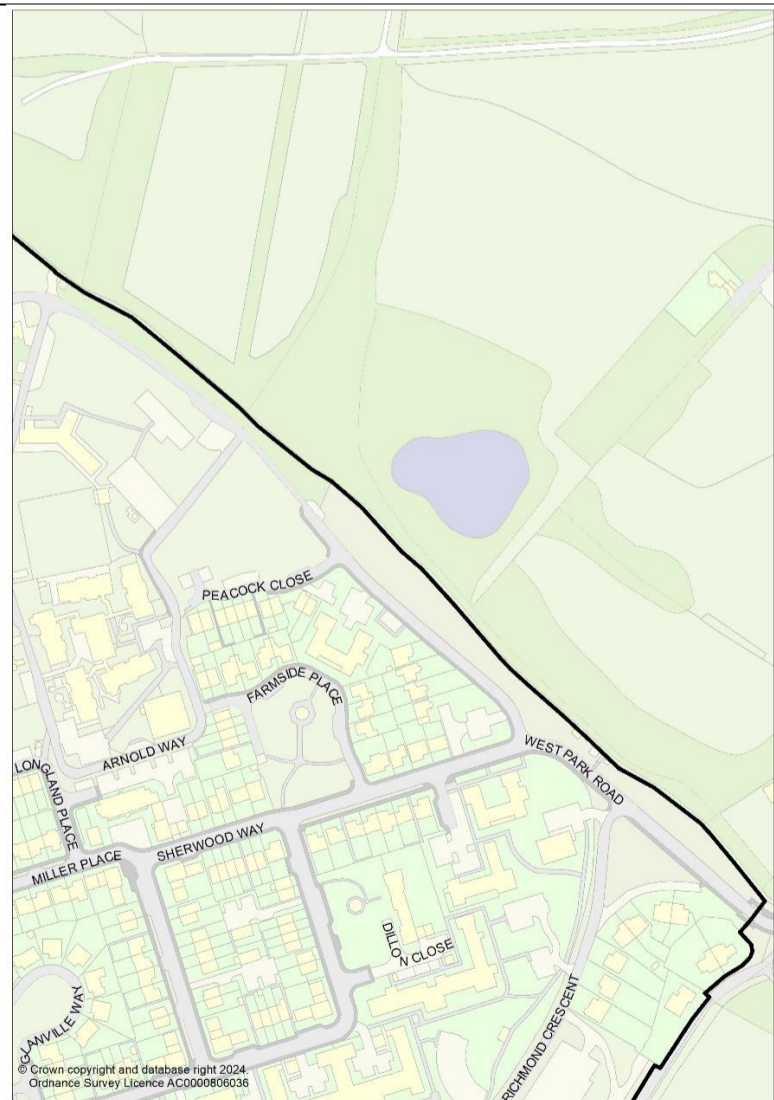


Aerial Photo of the site

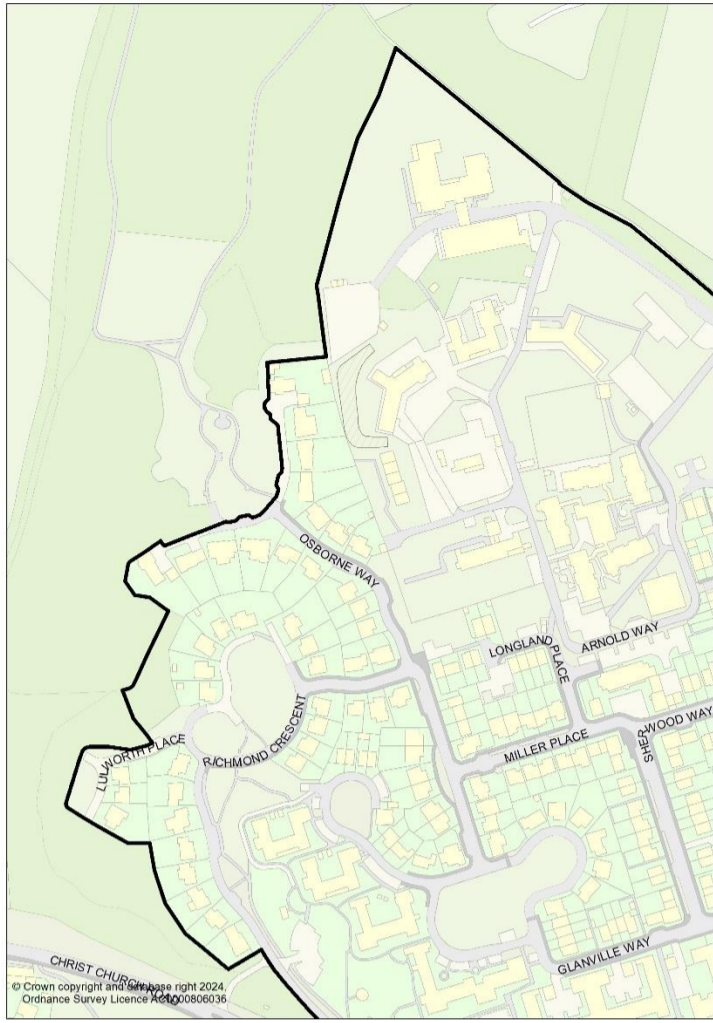


A defensible boundary could be tightly drawn along the built up area.

1. The southern boundary would follow the road line of Richmond Crescent and the rear of well defined, regular property boundaries and along the bottom SE the line would follow a public footpath.



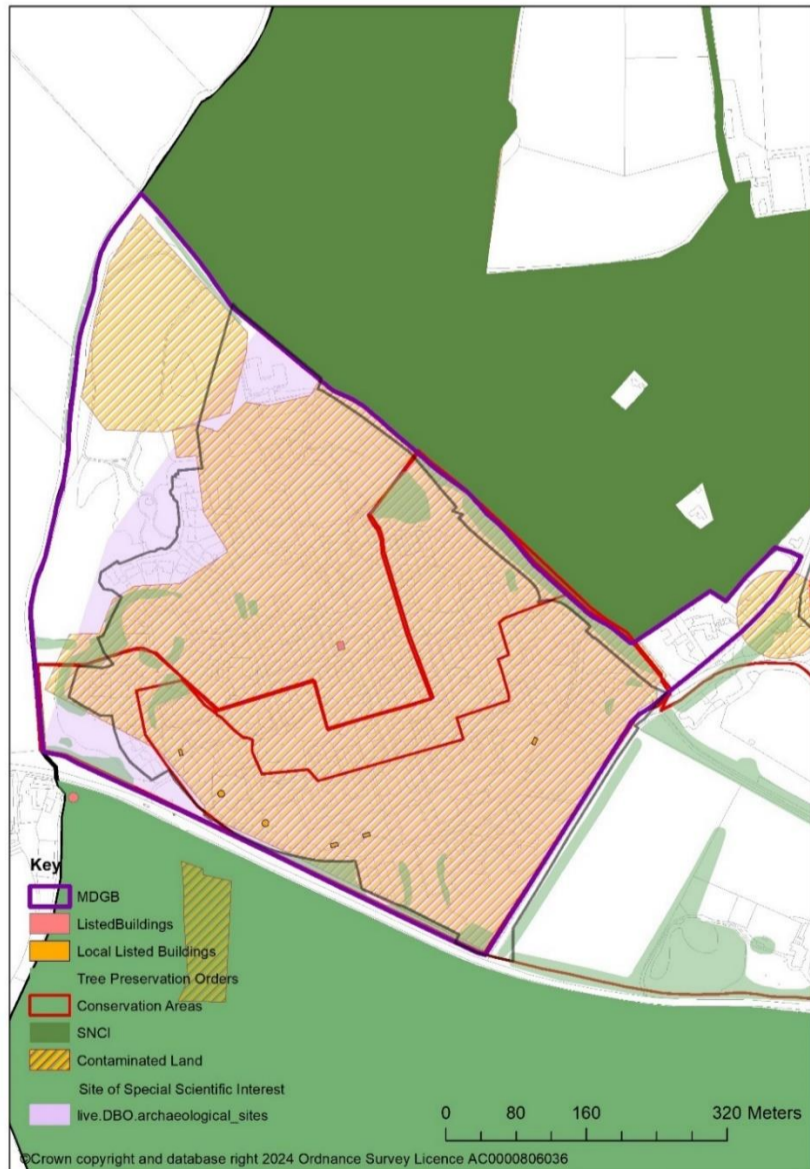
2. The eastern boundary would follow the public footpath located parallel to West Park Road until it reaches the northern most tip,



3. At the northern tip it would wrap around the triangular boundary of the NHS buildings (Microbiology Department, West Park Hospital which is now vacant), following the well defined/regular property line defined by hedging. It could wrap tightly against the car park and then follow the well defined/regular property lines along the western edge.



4. This would continue along the well define property lines back down to Richmond Crescent.  
This would be a tightly drawn boundary ensuring that built up areas that are unnecessary to keep permanently open are excluded from the GB and the more open areas remain within the Green Belt.



**Total area that could be inset**

25.6 ha

**Other designations which offers protection from inappropriate development**

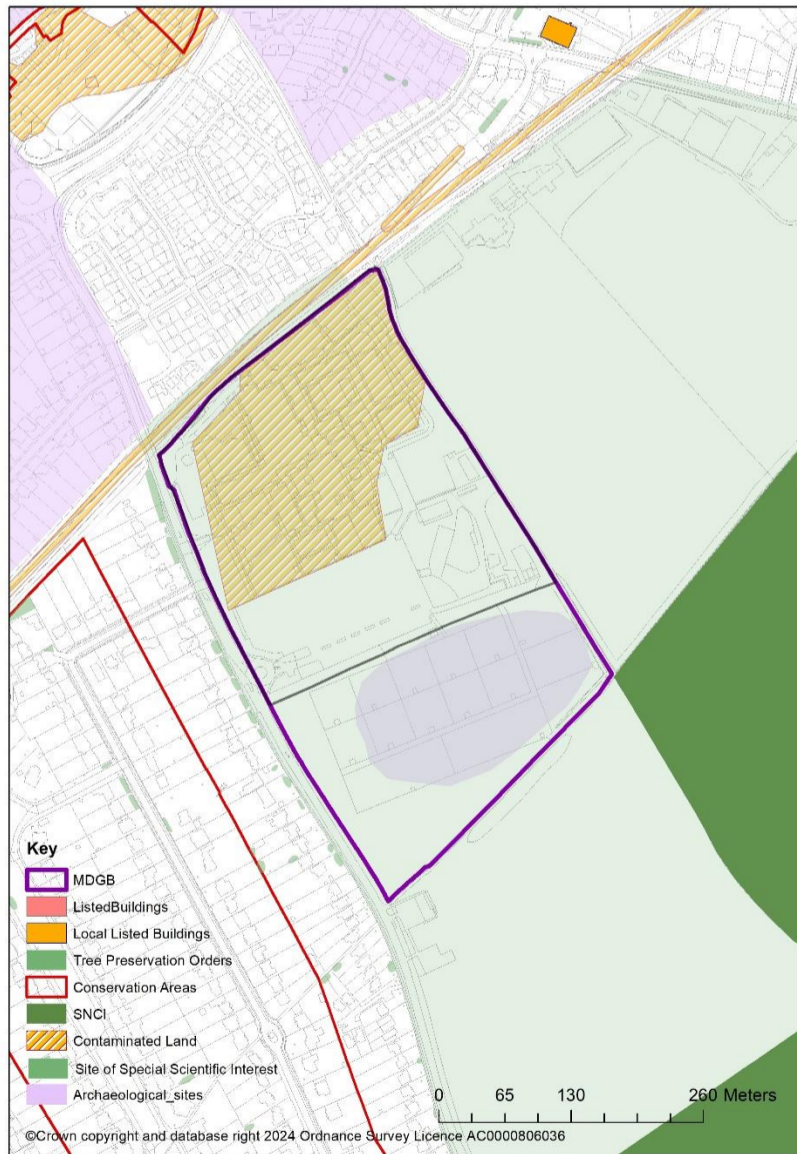
- TPOs
- Contaminated land
- Archeological importance
- West Park Conservation Area
- Listed Buildings



Site 42\_001 NESCOL



Aerial Photo of the site



Map showing constraints on the site

**Defensible boundary**

The defensible boundary could be amended to follow the edge of the bridleway (BW12) running adjacent to the eastern boundary of the College grounds. The southern boundary could wrap around the southern property line defined by fencing and hedge line of the car park of the campus, leaving the open farm area to the south (which is used by the college for educational purposes) to remain within the Green Belt.

To ameliorate the impact of any loss, the boundary line could be tightly drawn to only inset the buildings and hardstanding to the north of the parcel. The southern fields that are used for agricultural uses and are predominantly open in nature are proposed to be retained within GB boundary

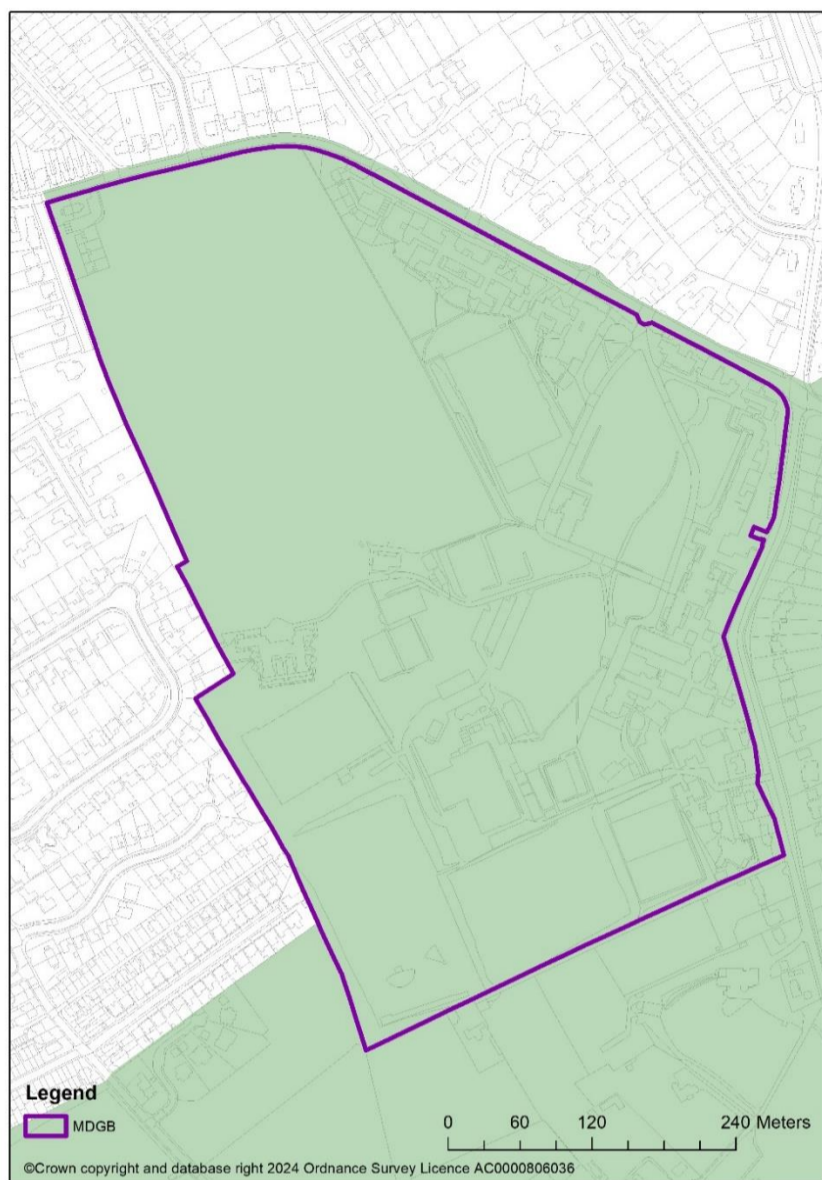
**Total area that could be inset**

10.08 ha

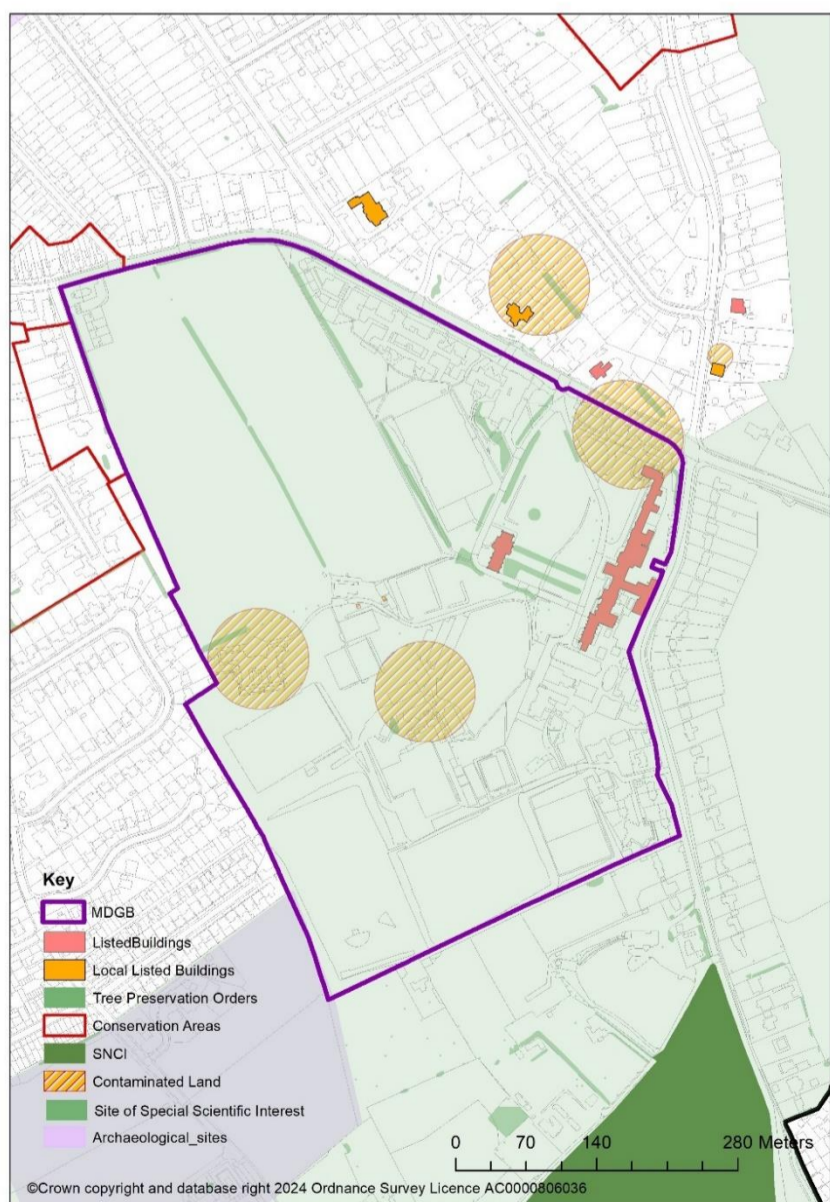
**Other designations which offers protection from inappropriate development**

- Contaminated land
- Archeological Site
- Adjacent BOA
- Adjacent SSCI

Site 36\_001 Epsom College



Aerial Photo of the site



Map showing constraints on the site

**Defensible boundary**

The defensible boundary could be amended to follow the Longdown Lane to the south and wrapping around the well defined property line of the whole campus.

As noted in the previous section, it would be difficult to draw a defensible boundary that allowed for only the buildings to be inset and the open areas to remain in the Green Belt. The open areas have long distant views towards the Downs, the open space/open areas are located within the grounds, hemmed in by the buildings on the edge.

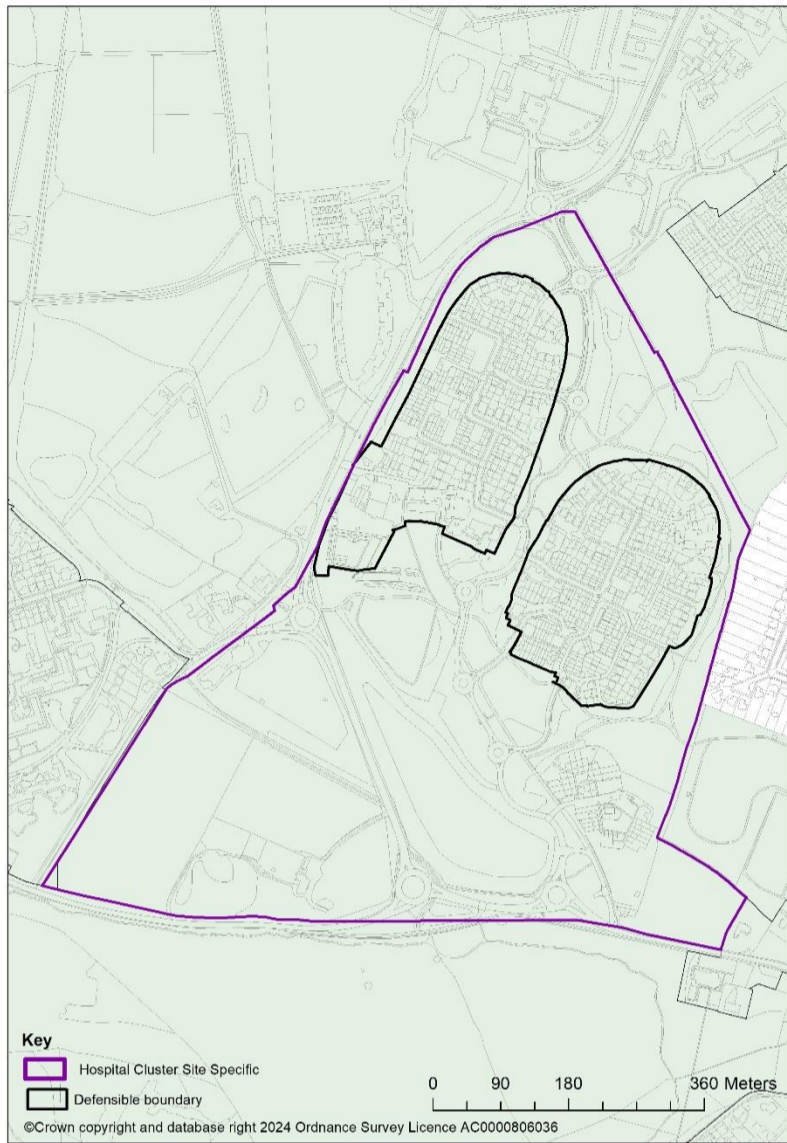
**Total area that could be inset**

30.39 ha

**Other designations which offers protection from inappropriate development**

- Contaminated land
- Listed buildings
- Locally listed buildings
- Adjacent to College Road Conservation Area
- Adjacent to Burgh Heath Road Conservation Area
- TPOs

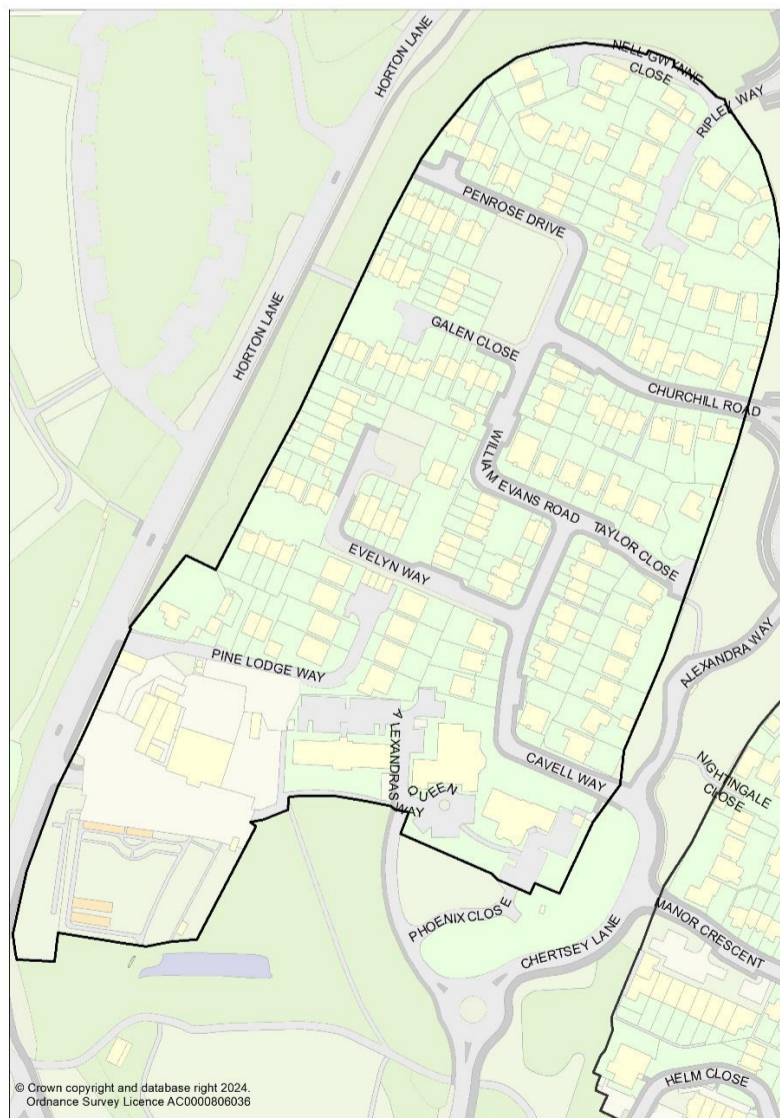
Site 22\_001 Manor Park (Former The Manor Hospital)



Proposed defensible boundary



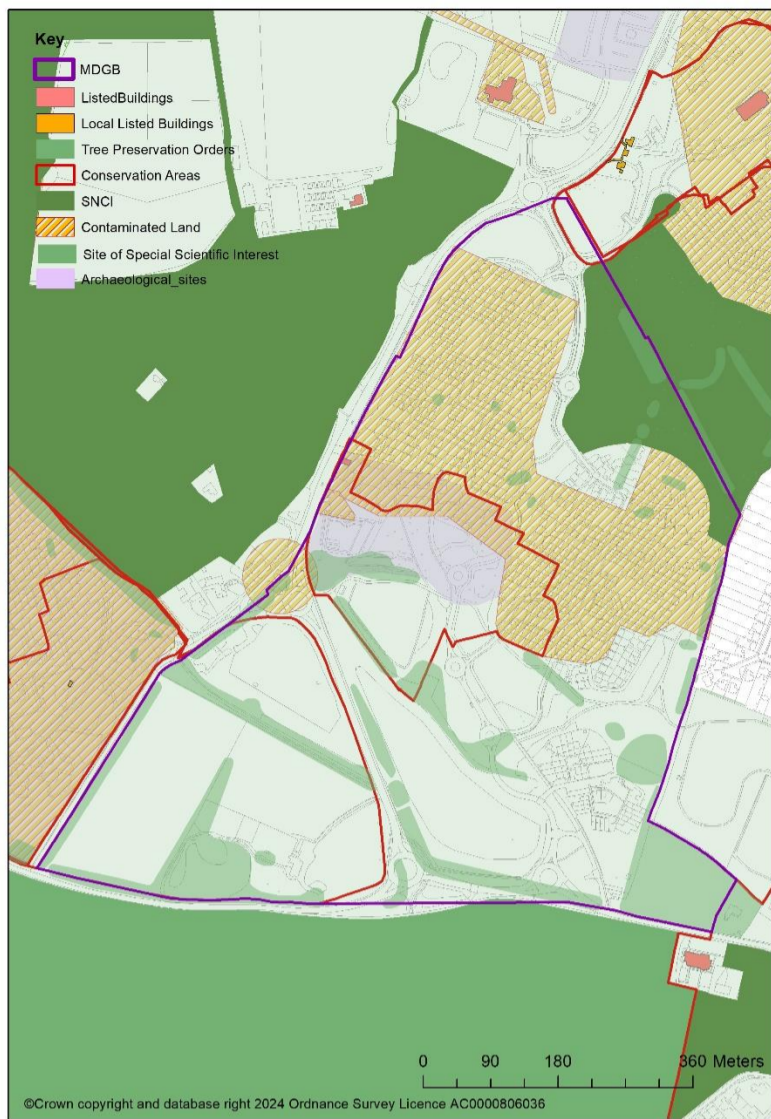
Aerial Photo of the site



1. The west parcel-The defensible boundary could follow tightly the property line which coincides with tree belt along Nell Gwynne Close and hugging the property line/ tree belt south along Abbotts Avenue down to Chertsey Lane. It would then follow the straight edge property line of Phoenix Close to the rear of the Nursery (The Old Moat) and follow the property boundary around the nursery, meeting the property line and tree belt along Horton Lane hugging the property line north.



2. The east parcel- The defensible boundary could follow tightly the property line which coincides with the tree belt on the other side around the parcel from Manor Crescent, around the tip of the parcel, south to around Rona Maclean Close. Crossing the road to Helm Close, cutting along the property boundary defined by straight edge fence and continue around the property lines of Manor Crescent.



Map showing constraints on the site

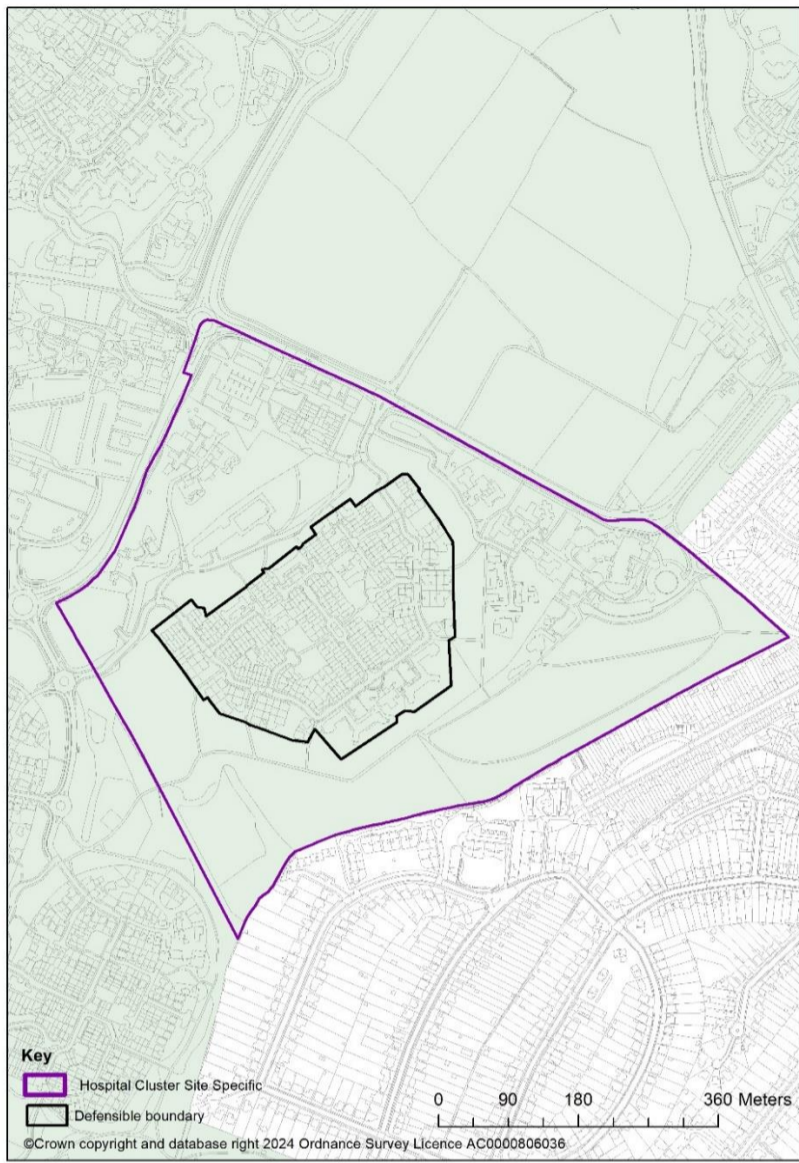
**Total Area that could be inset**

13.71 ha

**Other designations which offers protection from inappropriate development**

- Contaminated land
- Site of Archeological importance
- Manor Conservation Area
- West Park Conservation Area
- TPOs
- SNCI

Site 25\_001 Livingstone Park (Former Horton Hospital)



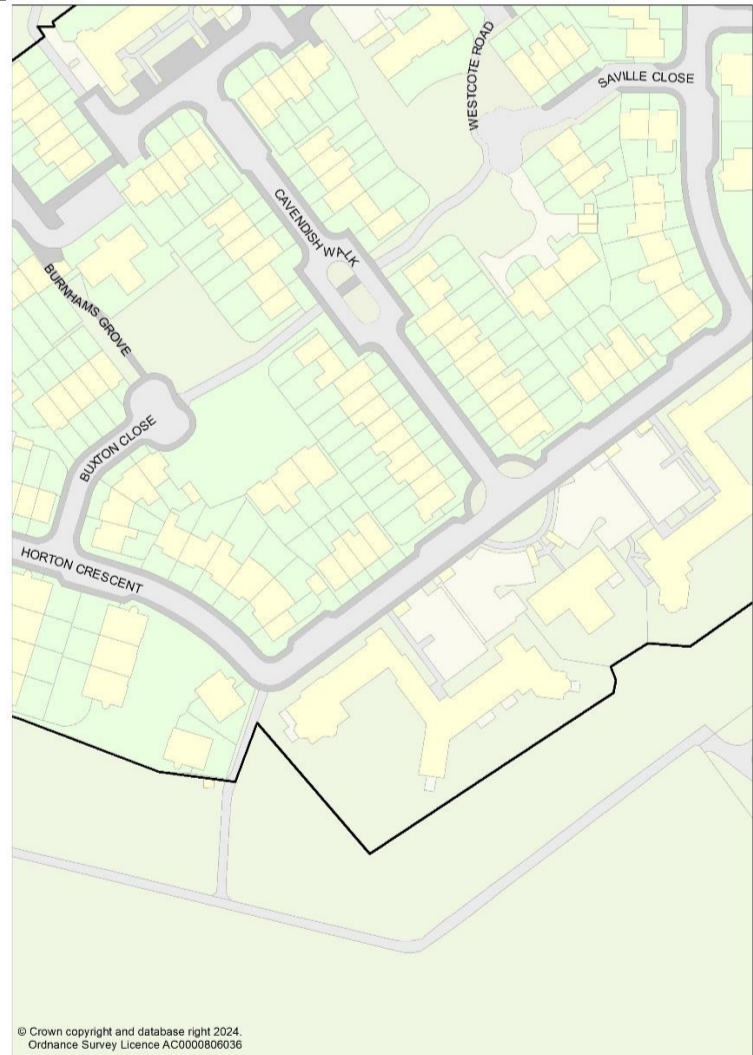
Proposed defensible boundary



Aerial Photo of the site



1. The defensible boundary line could follow the property boundaries tightly around Horton Crescent which wraps the area from the east.

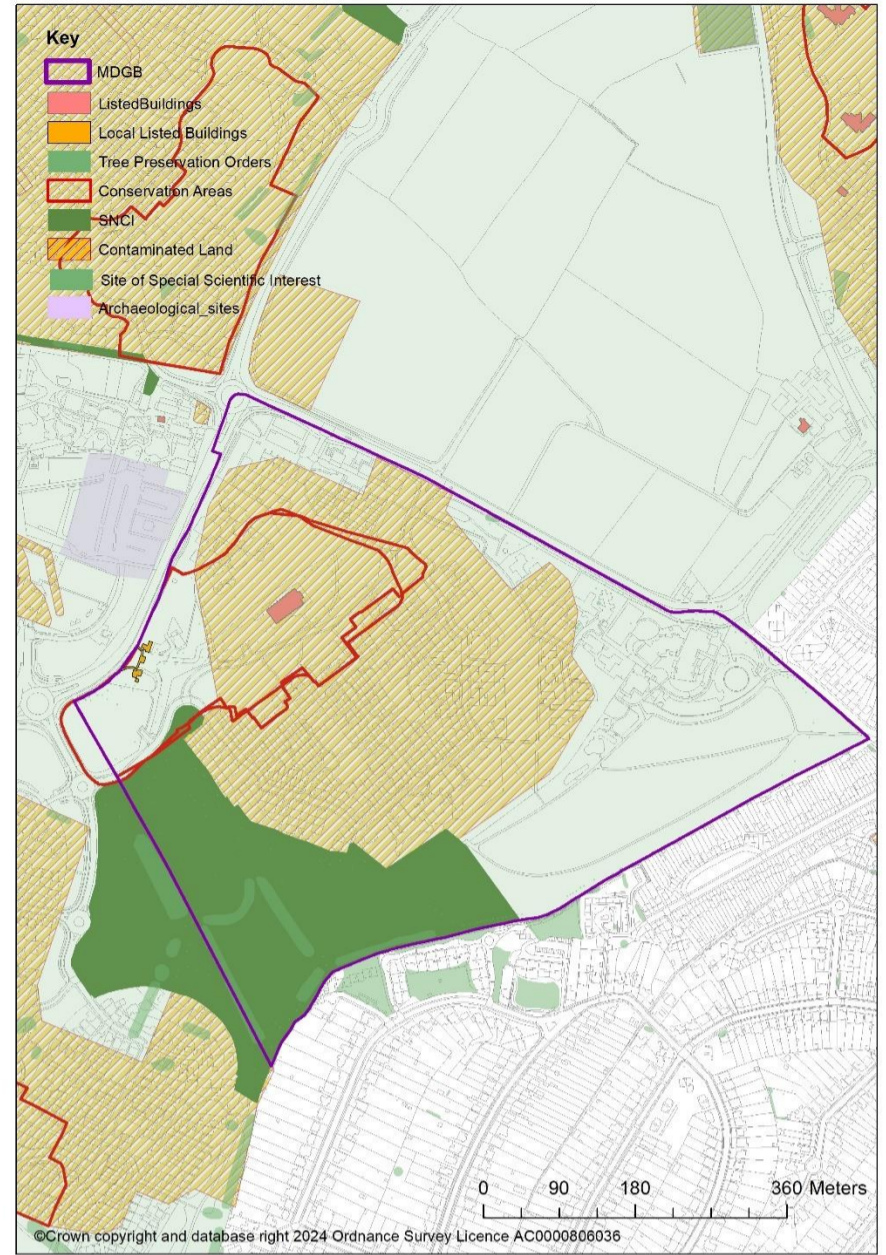


2. This would continue the entire way around Horton Crescent to the west following the semi circular shape.



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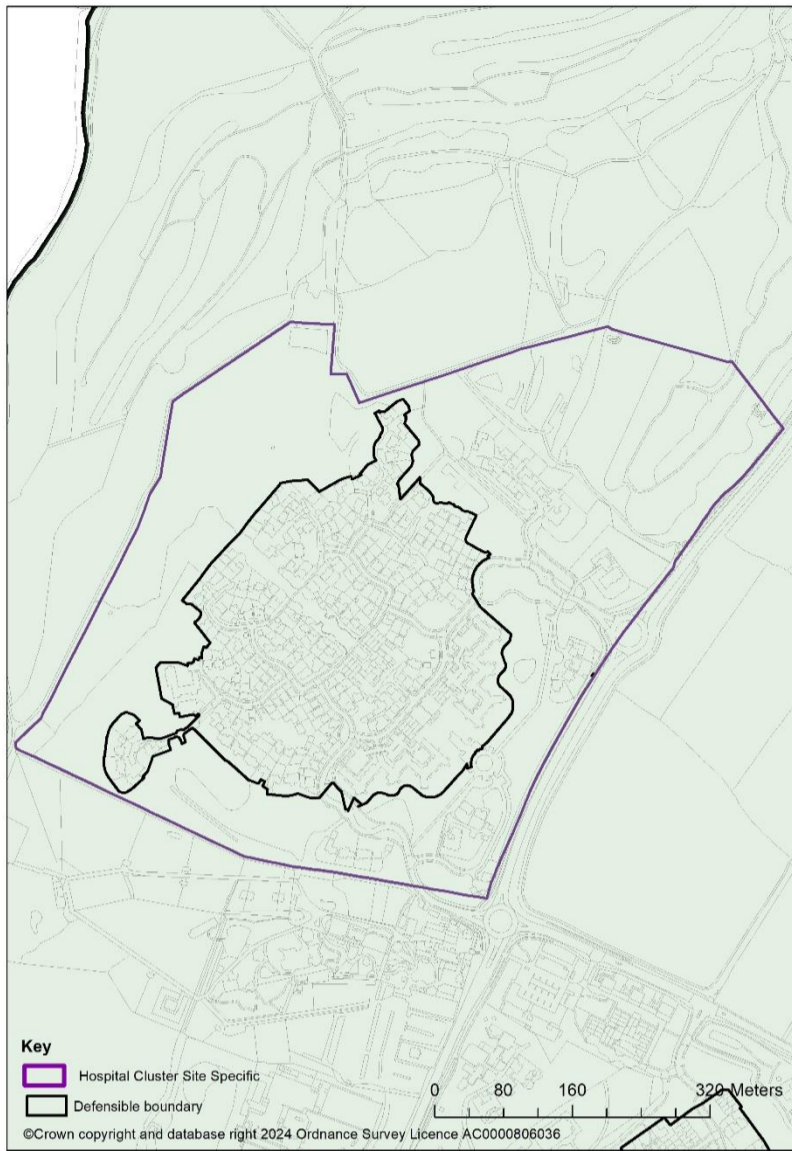
3. It would then follow the straight edged property boundaries along Haven Way. The open green areas would remain in the Green Belt. The Horton Arts Center and School and local centre would remain in the Green Belt.



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<b>Total Area that could be inset</b>
14.63 ha.
<b>Other designations which offers protection from inappropriate development</b>
<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>

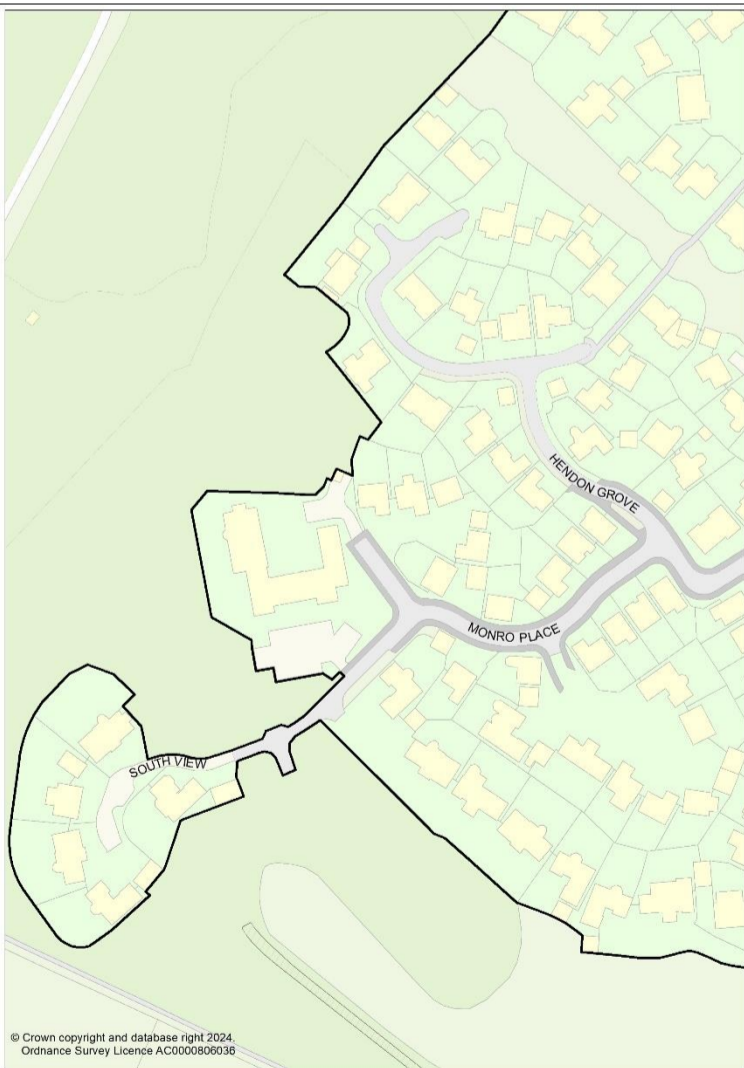
Site 27\_001 NE Horton Lane Residential (Former Long Grove Hospital)



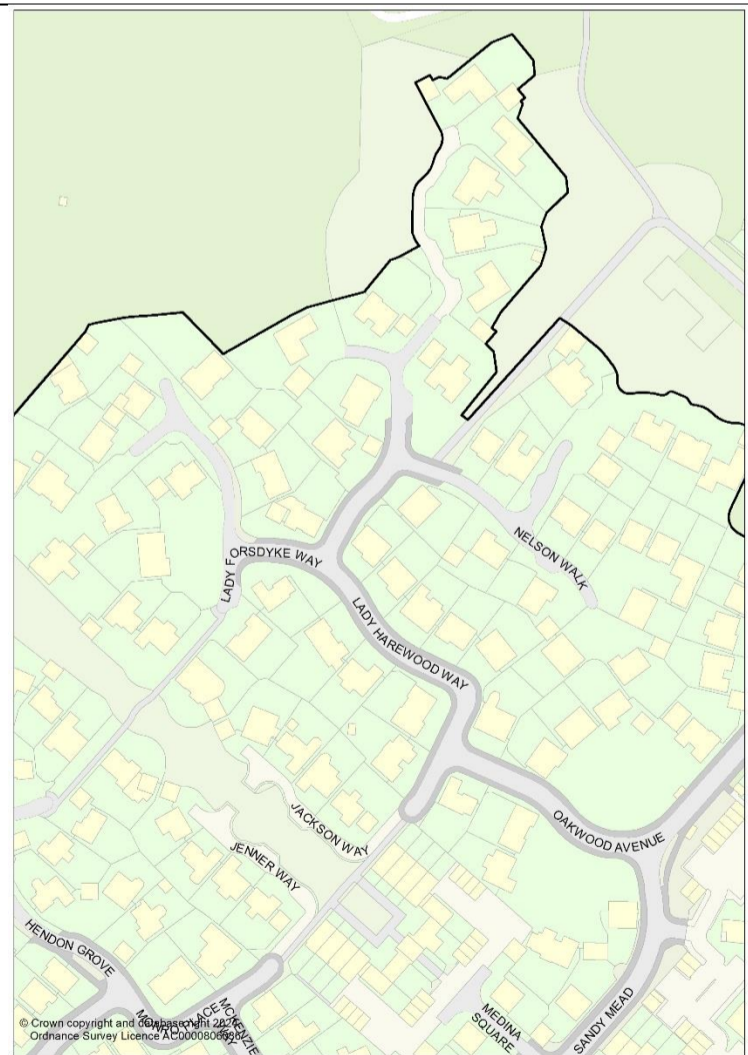
Proposed defensible boundary



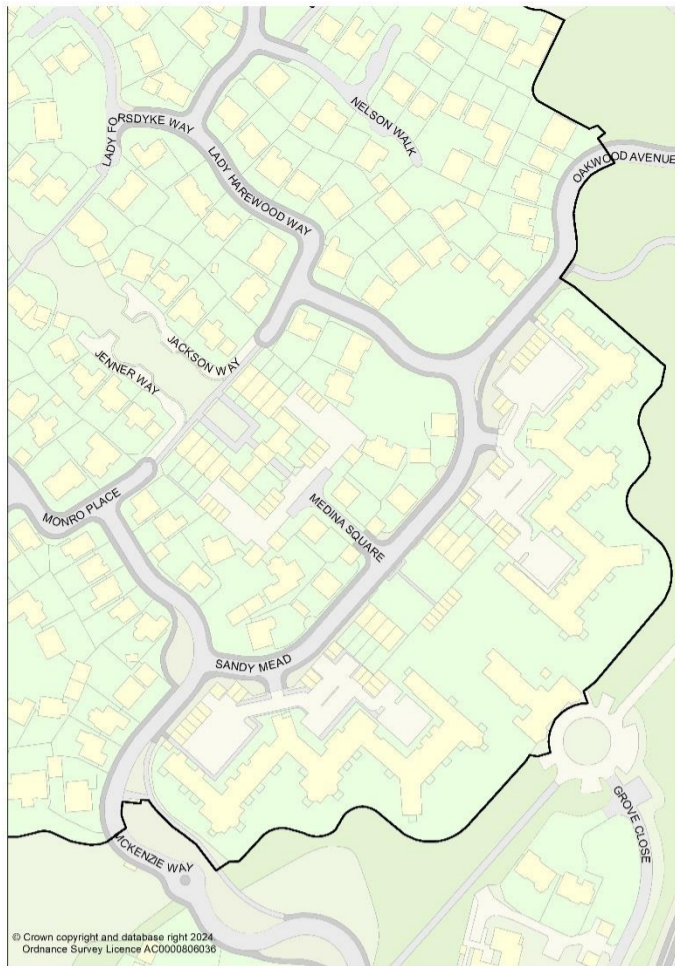
Aerial Photo of the site



The defensible boundary could be amended to wrap tightly with property boundaries. To the west wrapping tightly around properties in South View and Hendon Grove



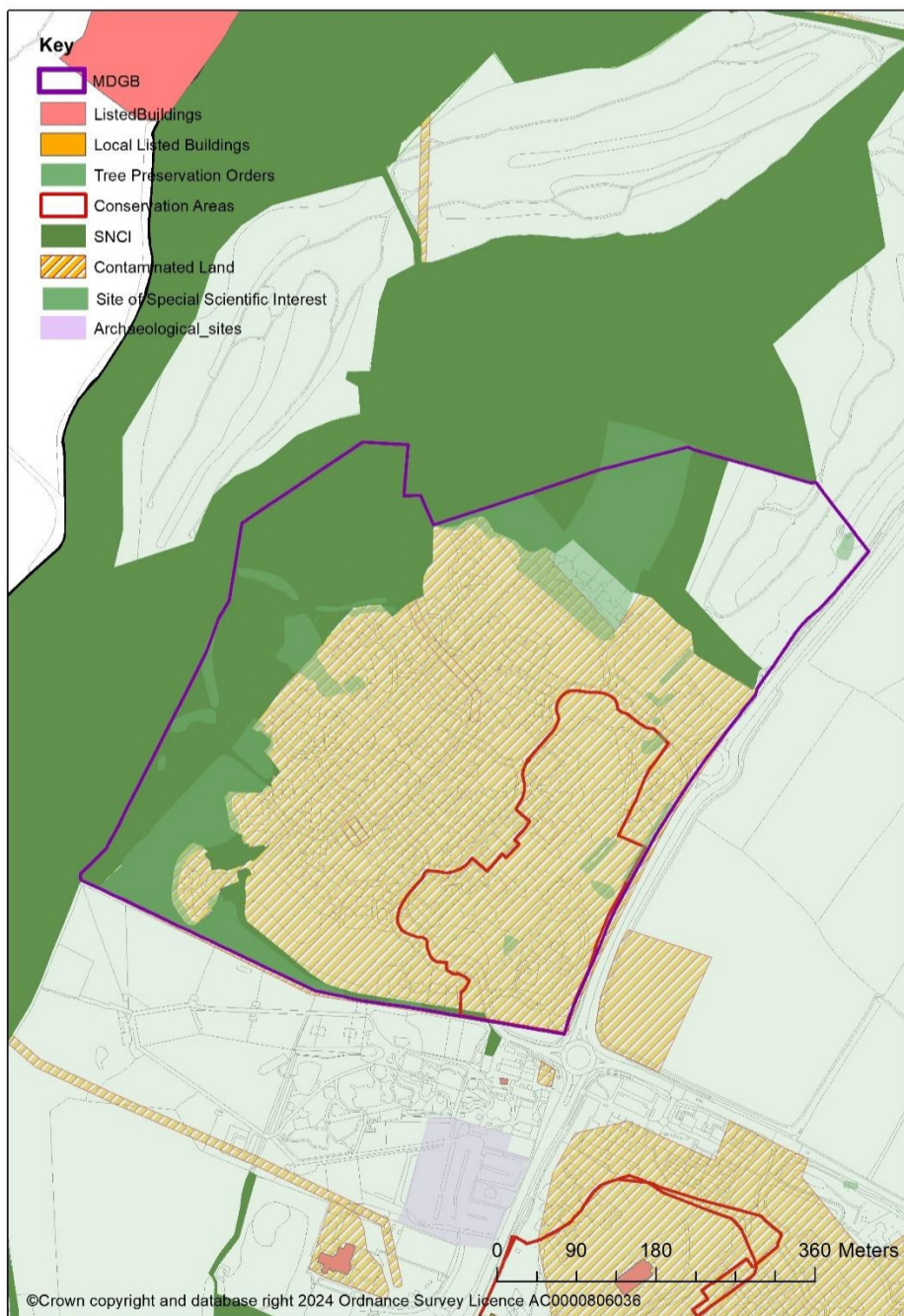
To the north, wrapping around Lady Harewood Way, Nelson Walk.



To the South East the property boundary could be drawn tightly against the property boundary of Sandy Mead, where the dense tree line would remain in the Green Belt



The boundary line would continue across McKenzie Way following the paved road of South View which lies adjacent to the open green space to the south. The open green space would remain in the Green Belt.



Map showing constraints on the site

**Total Area that could be inset**

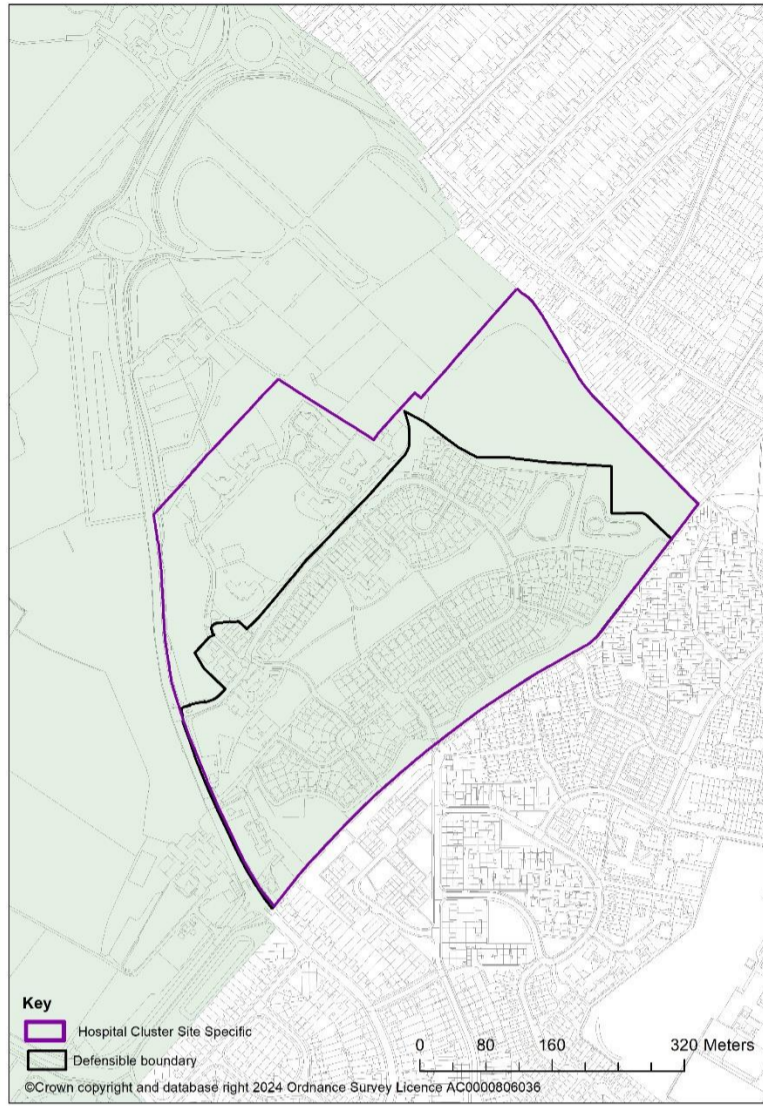
12.19 ha.

**Other designations which offers protection from inappropriate development**

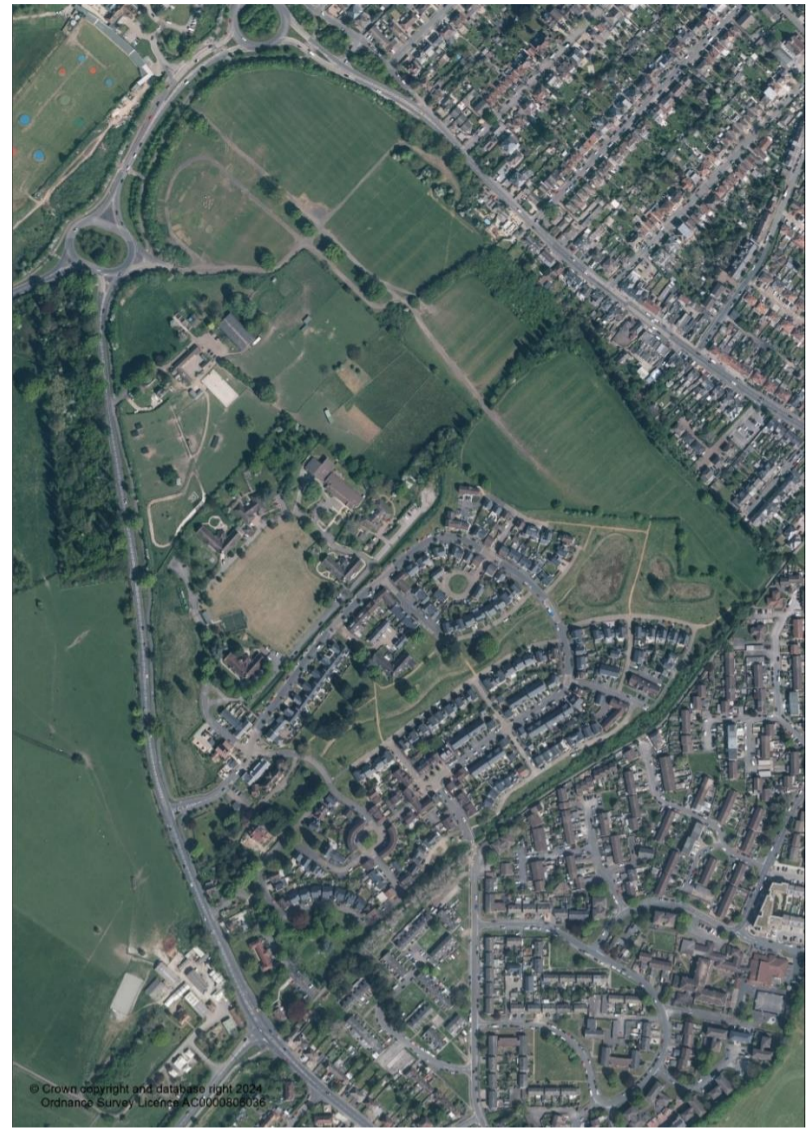
- Contaminated land
- Long Grove Conservation Area
- TPOs
- Adjacent Horton Country Park LNR
- Adjacent Horton Country Park SNCI
- Adjacent Ancient woodland



Site 30\_001 Hook Road Residential (Former St Ebba's Hospital)



Proposed defensible boundary



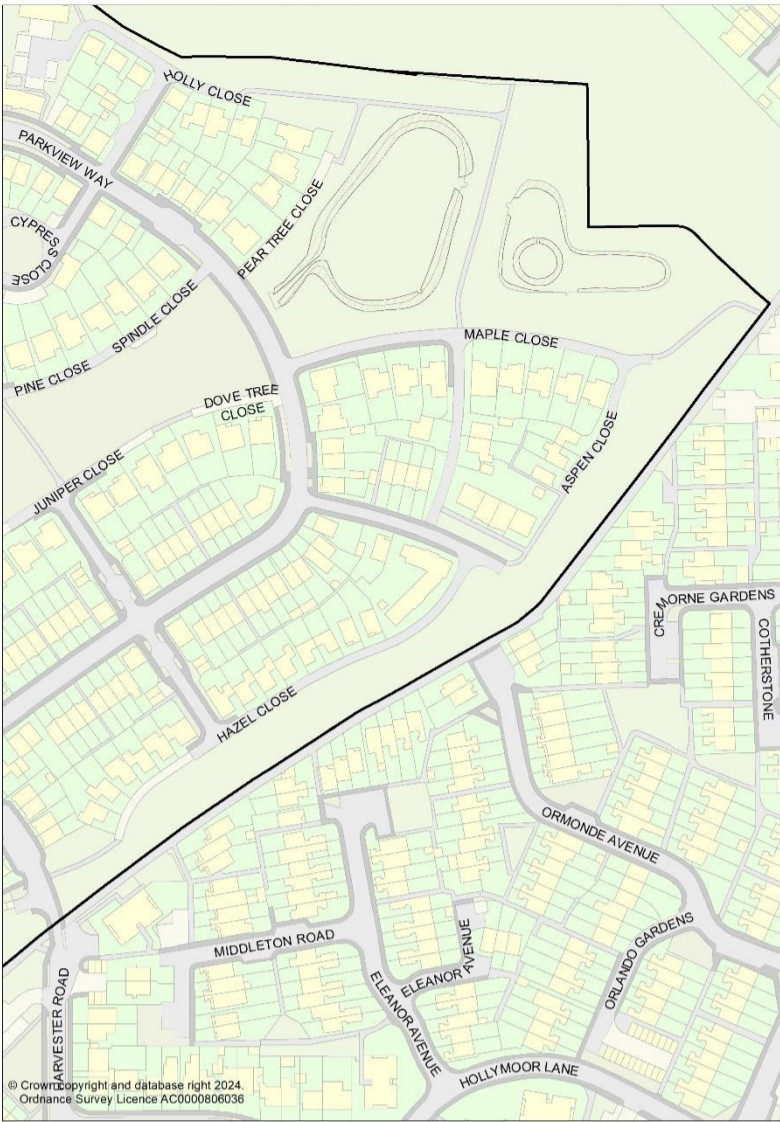
Aerial Photo of the site



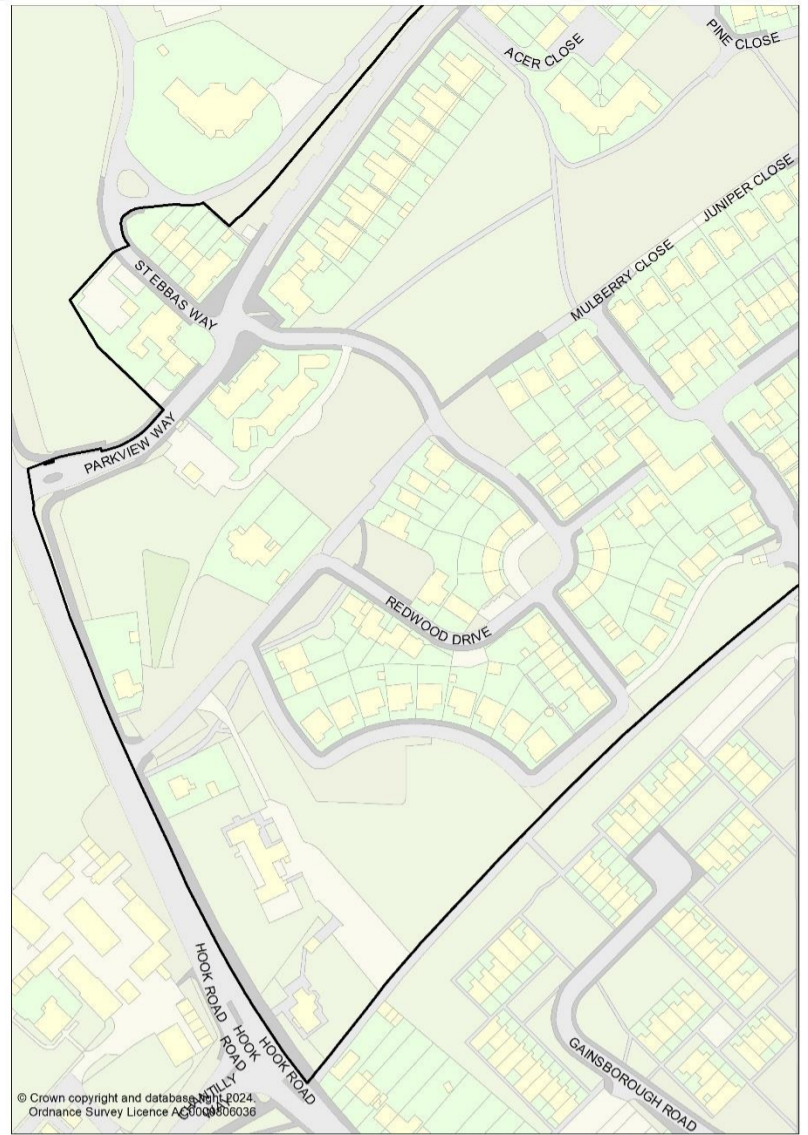
1. The defensible boundary could be amended to follow Hook Road to the west, turning off the road following the field line and cut around the buildings on entrance to St Ebbas Way, the line would follow the fence/property line between St Ebbas Way/Parkview



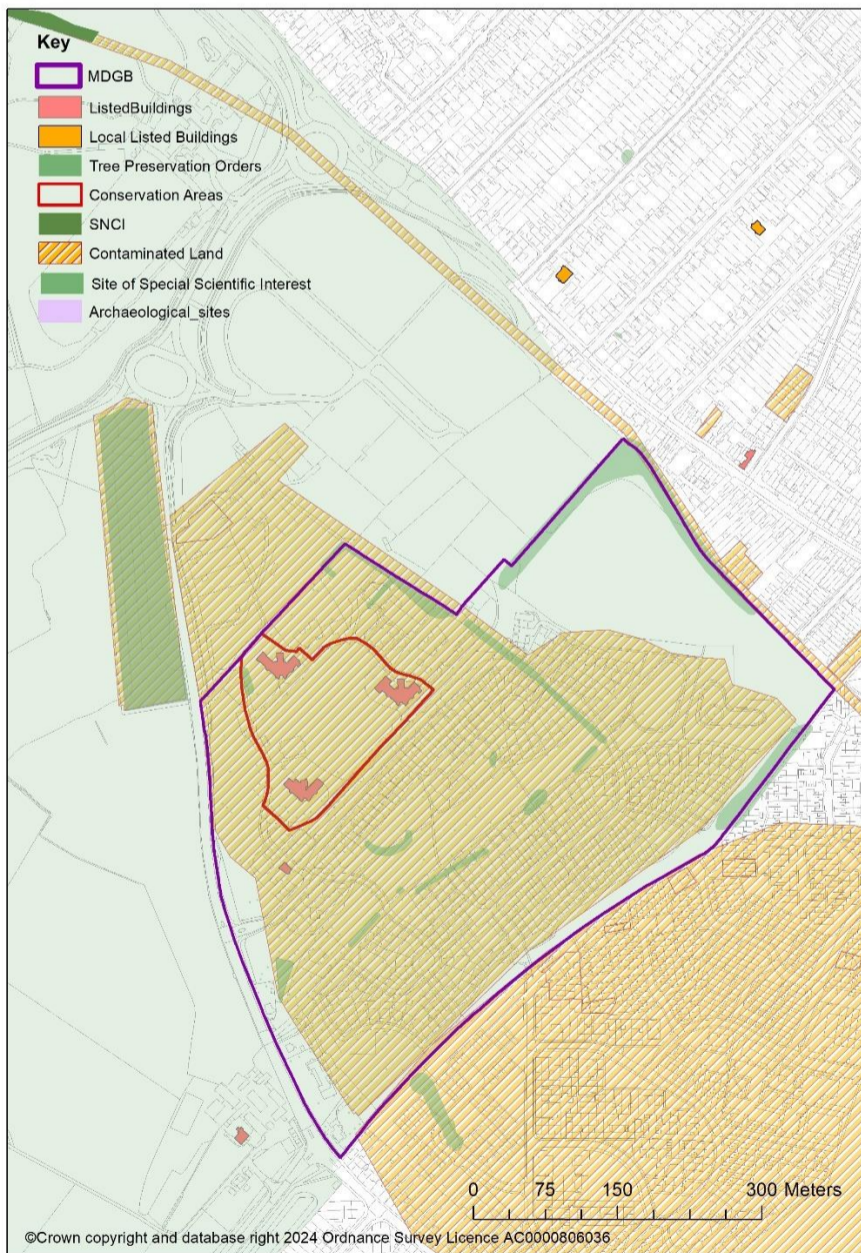
2. The line would follow the fence/property line to the end of Parkview Way following the hedge boundary near Holly Close and Hook Road Arena



3. The line would continue along the boundary along Hook Road Arena down to Bridleway 83,



4. The line would continue along the southern boundary tracing back to Hook Road.



Map showing constraints on the site

**Total Area that could be inset**

16.14 ha

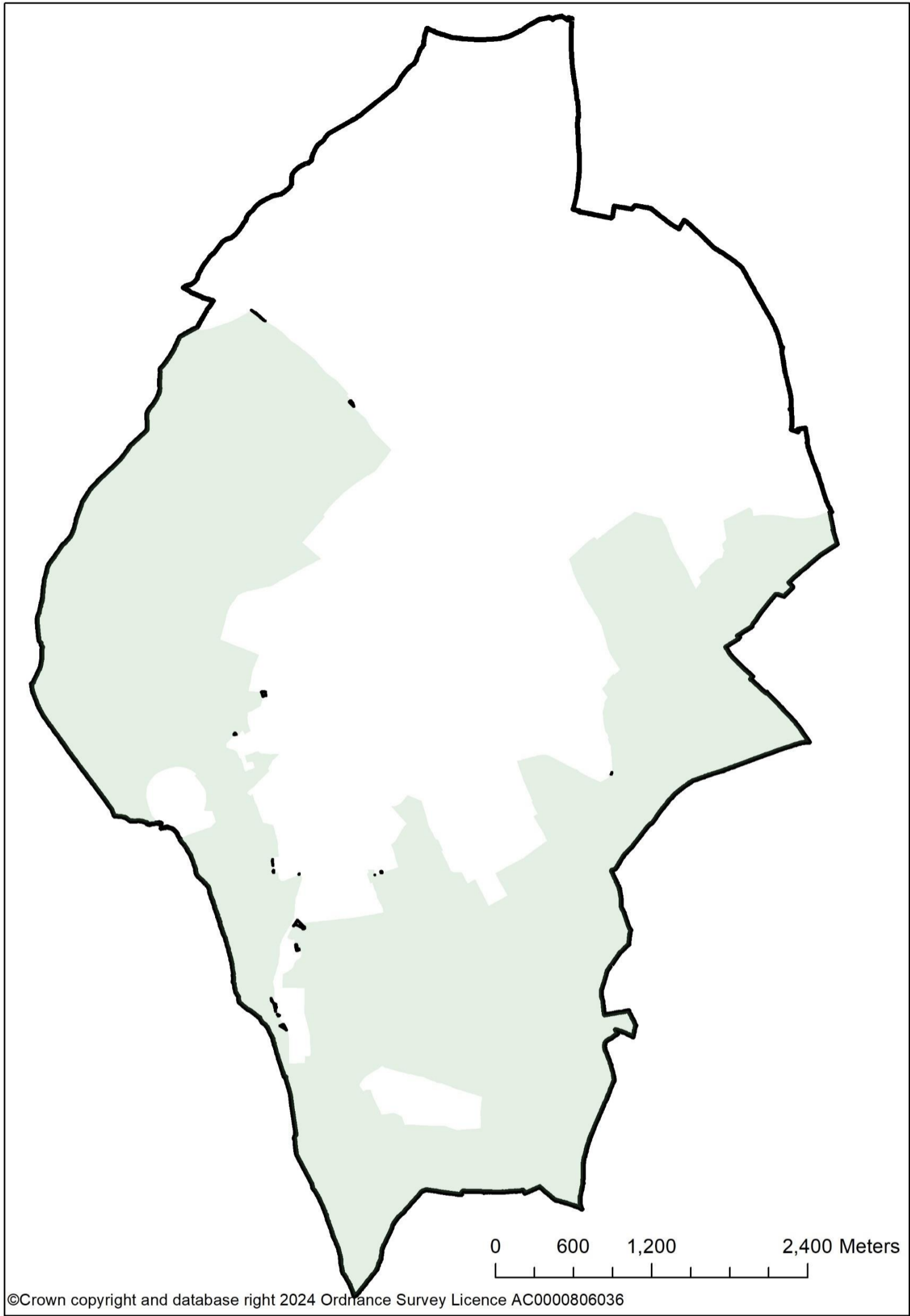
**Other designations which offers protection from inappropriate development**

- Contaminated land
- St Ebba's Conservation Area
- Open space
- TPOs
- Setting of statutory listed buildings

- 3.31 Whilst the inseting of the major previously developed sites within the Green Belt would result in less policy restraint towards their growth and redevelopment proposals, there would still be a need to adhere to other relevant planning policies and guidance controlling the development of such sites in these areas, for example proximity to heritage assets or landscape constraints.
- 3.32 It may be the case that some or all of the sites are not considered appropriate for inseting and should remain 'washed over' within the Green Belt, this would imply that the open character of the site makes an important contribution to the openness of the Green Belt.

## 4 Section 3 - An assessment of any anomalies

- 4.28 This section will consider whether any minor Green Belt boundary changes may be required to correct any anomalies in the current Green Belt boundary. Over time, anomalies have occurred. These are usually small in nature and may have arisen because there have been changes in circumstances on the ground since the current Green Belt boundary was defined, or perhaps through the digitisation of mapping or because advice on the Green Belt boundary has been updated.
- 4.29 The preparation of the new Local Plan 2022-2040 presents an opportunity to ensure that the Green Belt boundary is up to date and follows consistent criteria throughout the borough.
- 4.30 When defining Green Belt boundaries, the NPPF (paragraph 148) states that local planning authorities should, among other things “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”. These are not stated but may include, roads, railway lines, water courses, footpaths or bridleway, established tree lines or field patterns.
- 4.31 Account should also be taken of the extent to which it is necessary to keep land permanently open.
- 4.32 The methodology for this consists of a single stage:
- Stage 1: Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?



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Figure 10 Map showing the location of anomalies

**Map**



**Name:**

221-225 Chessington Road

**Reference:**

001

**Area:**

0.0463 ha (463 sqm)

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

The existing boundary line cuts through the rear gardens of three 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.

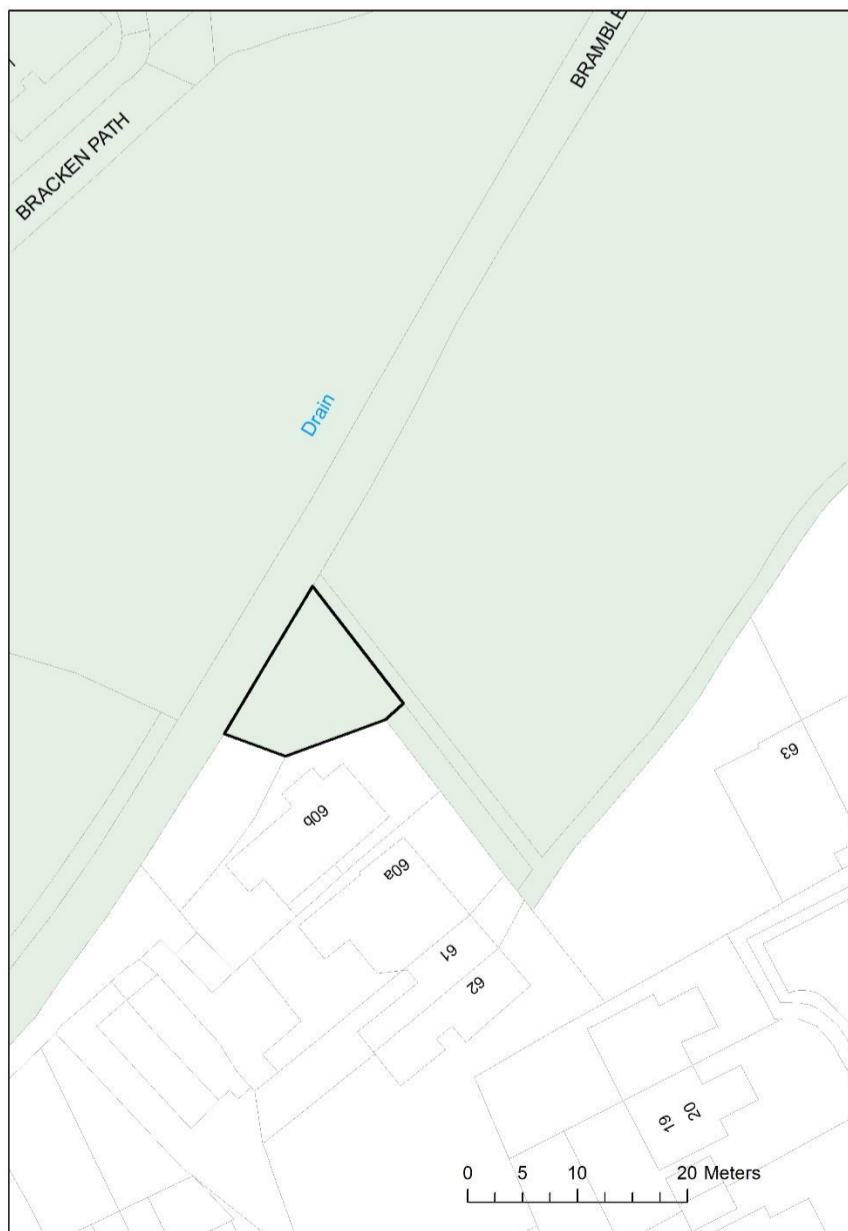
The amendment would provide clarity by using a clear physical feature.

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

**Reason for amendment**

To align with physical feature

**Map**



**Name:**

Bramble Walk

**Reference:**

002

**Area:**

0.0463 ha (463 sqm)

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

The existing boundary line cuts through the rear gardens of three properties, slicing through the property at the end

To correct this anomaly the boundary could wrap around the property boundaries entirely

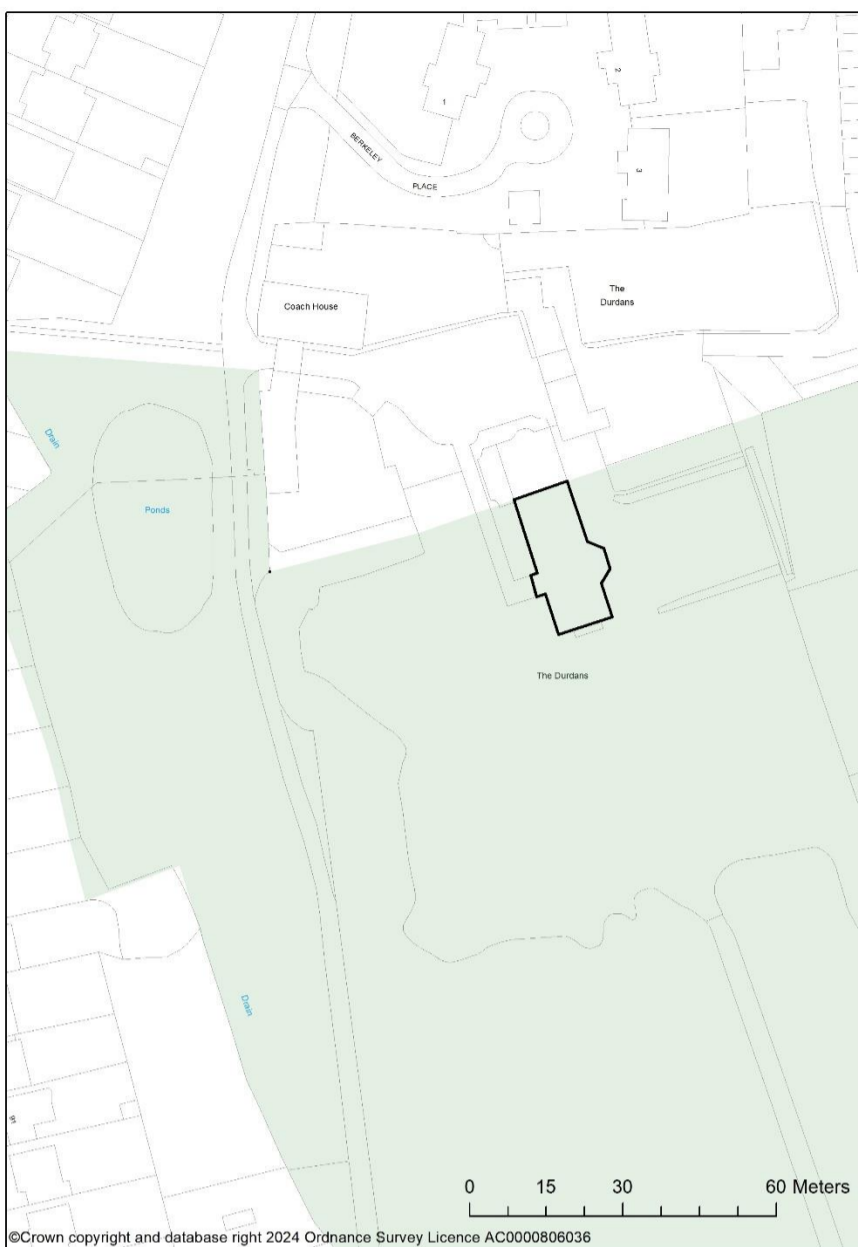
The amendment would provide clarity by using a clear physical feature.

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

**Reason for amendment**

To align with physical feature

**Map**



**Name:**

Durdans Stables

**Reference:**

003

**Area:**

0.0129ha (129 sqm)

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

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

To correct this anomaly the boundary could exclude the entire building from the Green Belt so there is no ambiguity as to whether the building is within or outside the Green Belt.

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

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

**Reason for amendment**

To align with physical feature

**Map**



**Name:**

Christ Church Road open green space

**Reference:**

004

**Area:**

0.088 ha

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

The existing boundary line cuts through the open green space.

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.

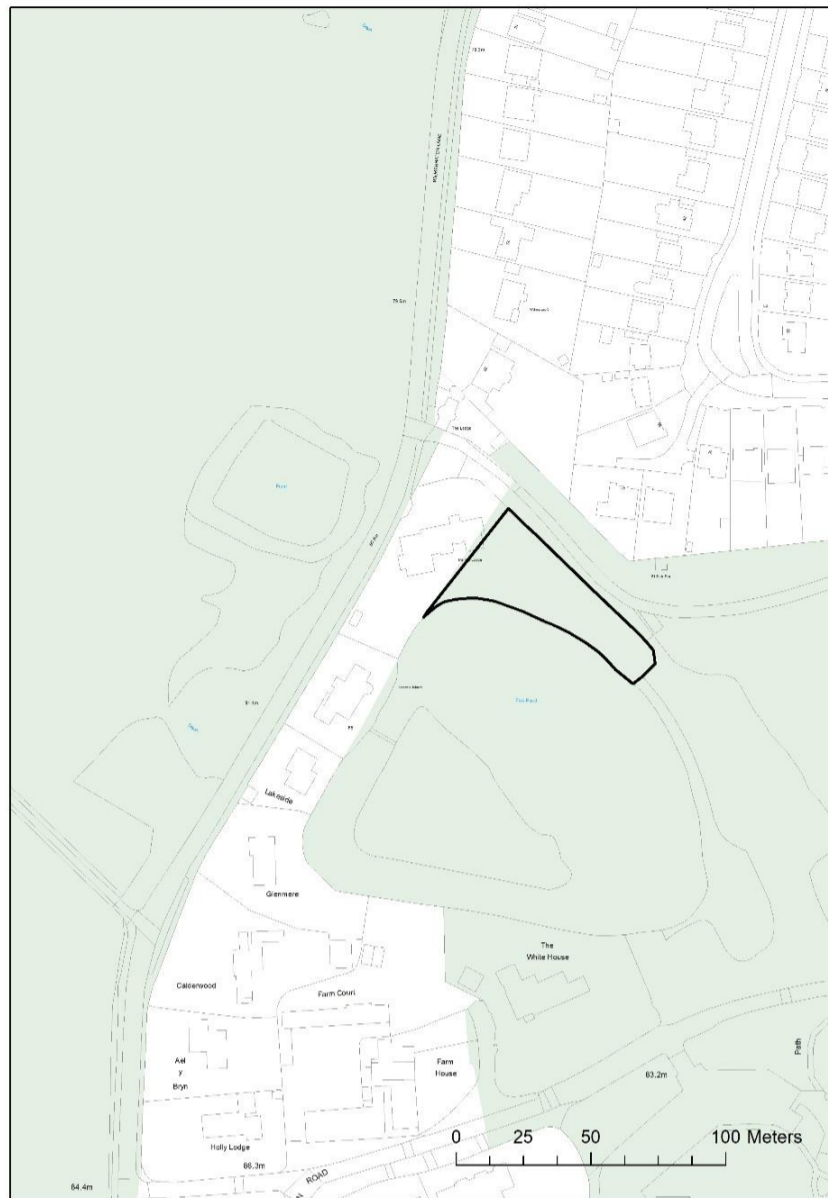
The amendment would provide clarity by using a clear physical feature.

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

**Reason for amendment**

To align with physical feature

**Map**



**Name:**

Wilmerhatch Lane

**Reference:**

005

**Area:**

0.17 ha

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

The existing boundary line cuts through a property boundary.

To correct this anomaly the boundary could wrap around the entire property line.

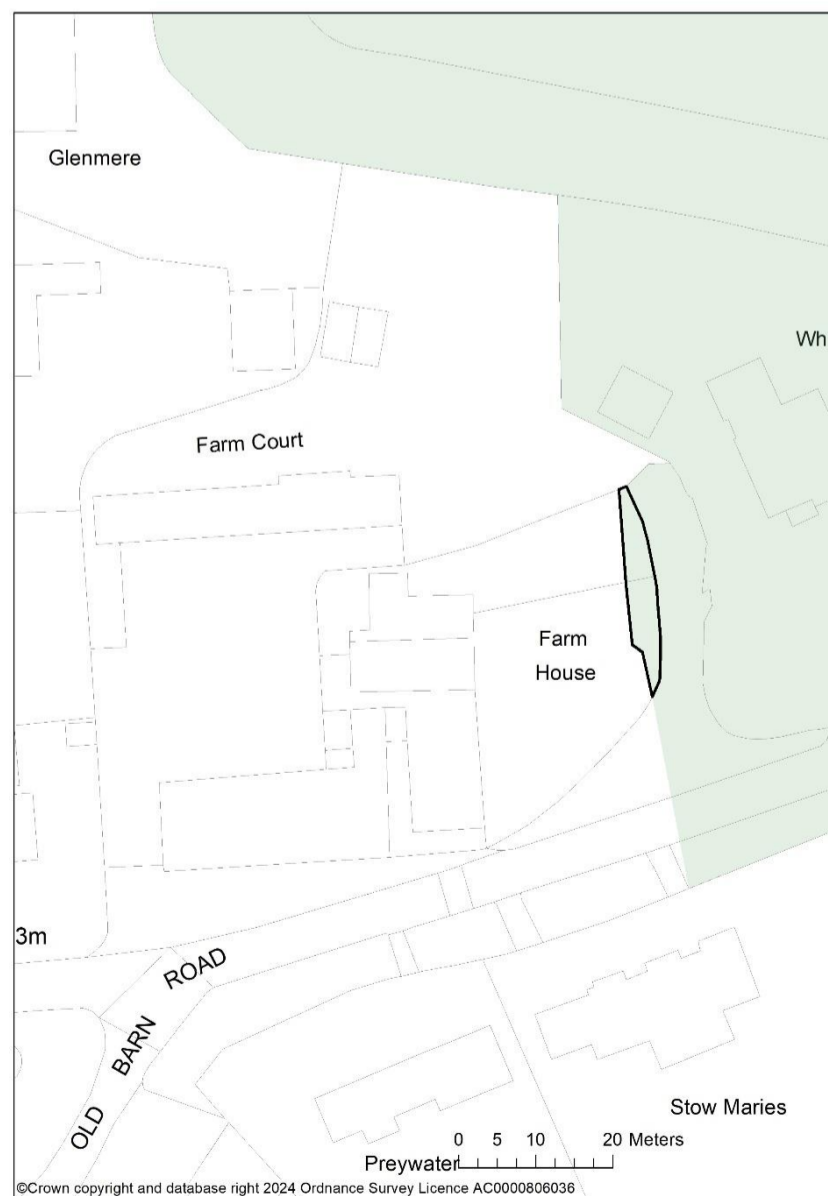
The amendment would provide clarity by using a clear physical feature.

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

**Reason for amendment**

To align with physical feature

**Map**



**Name:**

Old Barn Road

**Reference:**

006

**Area:**

0.05 ha

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

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.

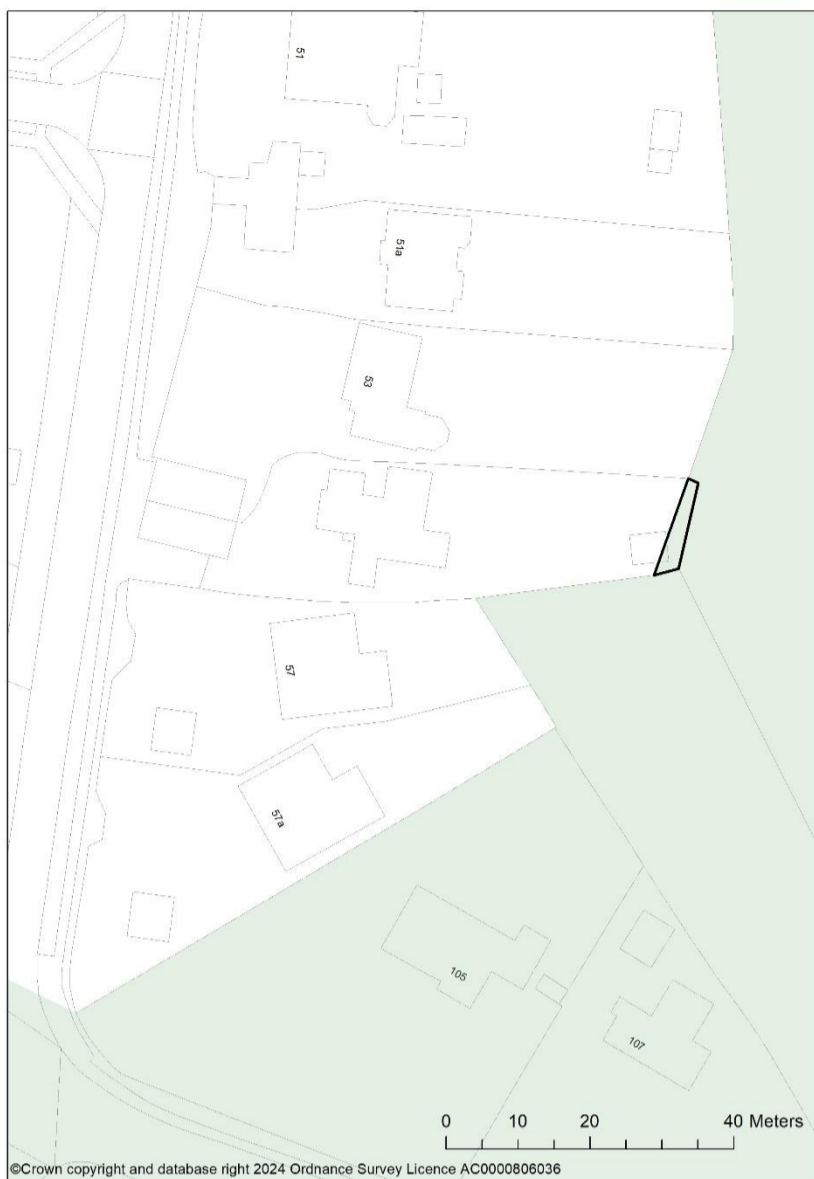
The consequent impact would be diminimus and an improvement, where the boundary would follow a clear physical feature

**Reason for amendment**

To align with physical feature



**Map**



**Name:**

55 Longdown Lane North

**Reference:**

007

**Area**

0.0029 ha (29 sqm)

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

The existing boundary line cuts through a property's boundary.

A minor amendment to the boundary could be made to exclude the rear garden.

The impact of this change would be diminimus.

**Reason for amendment**

To align with physical feature.

**Map**



**Name:**

Chessington Road / Oak Tree Close

**Reference:**

008

**Area:**

0.0277 ha (277 sqm)

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

The existing boundary line cuts a bus stop and changing the boundary line neatens the boundary.

**Reason for amendment**

To better align with physical features.

**Map**



**Name:**

Wilmerhatch Lane - multiple

**Reference:**

009

**Area:**

0.1463 ha (1463 sqm)

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

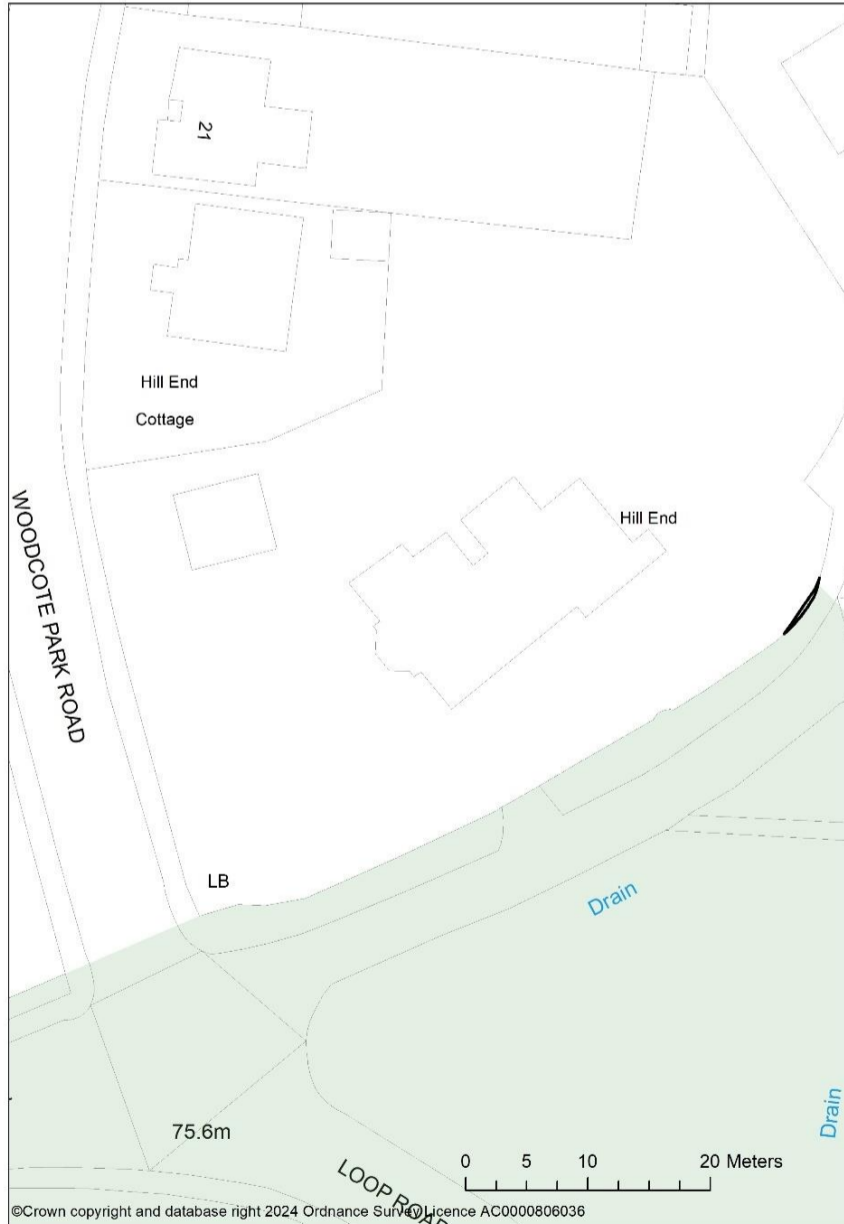
The existing boundary does not follow rear boundary property line to residential dwellings.

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

**Reason for amendment**

To better align with physical features.

**Map**



**Name:**

Woodcote Side / Woodcote Green Road

**Reference:**

010

**Area:**

(1 sqm)

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

Very minor change to boundary to align with the property boundary and neaten up the line.

**Reason for amendment**

To better align with physical features.

**Map**



**Name:**

Woodcote Side

**Reference:**

011

**Area:**

0.0052 ha (52 sqm)

**Does the Green Belt boundary follow physical features that are readily recognisable and likely to be permanent?**

Slight changes to boundary to align with the property boundary and neaten up the line.

**Reason for amendment**

To better align with physical features.

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

- 5.1 This assessment is carried out so that if exceptional circumstances are demonstrated for the need to release land to accommodate future development and amend the boundaries of the Green Belt then consideration has been given to the presence (or otherwise) of readily recognisable physical features which are likely to be permanent. It is important to understand that this assessment is not recommending any of the following sites for removal from the Green Belt. This assessment looks at defensible boundaries of sites promoted for development in the Green Belt. The release of Green Belt land will require an 'exceptional circumstances' case to be made. Changes in the Green Belt can only be made in the preparation of a new Local Plan. Any proposed amendment will be based on overall consideration of the spatial strategy, taking into account sustainability, suitability, deliverability of sites, environmental considerations, other constraints and planning considerations. Green Belt will not be the single consideration.
- 5.2 To ensure a thorough and complete assessment of defensible Green Belt boundaries. All available (Green Belt) sites promoted for development and detailed in the Land Availability Assessment (2024), have been assessed.
- 5.3 Sites will be assessed on whether it exhibits defensible boundaries that would allow for inseting in accordance with the NPPF. A potential Green Belt inseting boundary would be indicated for the site if the principles of paragraph 148 of the NPPF (December 2023) could be accommodated, in particular the need to follow physical features that are recognisable and likely to be permanent.
- 5.4 These features are not defined but may include:
- Roads (major roads and A-roads)
  - Rail and other permanent infrastructure
  - Watercourses.
  - Footpaths and bridleways
  - Areas of woodland, hedgerows and treelines; and
  - Established field patterns
  - Existing development with strongly established and regular boundaries
- 5.5 In some cases, the features may be less defined or irregular. This might include irregular property boundaries, fragmented tree lines or hedgerows. This might be interpreted or considered less durable and less likely to be permanent, having greater potential to change over time.
- 5.6 As part of this assessment:
- Sites that consist of major policy constraints will not be considered further. Whilst this assessment is not assessing other constraints. These designations are highly restrictive and would effectively preclude development in any case. These are Flood zone 3b, Sites of national nature conservation importance (Sites of Special Scientific Interest (SSSI). We have also included Common Land in a similar regard here. None of the sites contained these constraints and therefore all promoted sites were assessed.
  - A combination of site visits (undertaken in Spring/Summer 2024) and desk-based assessments informed what the character of the sites and the relationship with the wider greenbelt and settlement.
  - An assessment of the key physical features within and adjacent to each site has been carried out which could be deemed suitable for defining a new defensible Green Belt boundary if the site is considered for release.
  - An assessment of landscape and visual sensitivity
- 5.7 The assessment of landscape sensitivity is informed by the published landscape character assessments<sup>1</sup>. Whether the landscape has a landscape designation or townscape designation (i.e., conservation area).
- 5.8 The assessment of visual sensitivity is informed by the topography and level of exposure (or not) of the site. The aesthetics or visual amenity of the site i.e., does it have an important role in the character of the area, what is the level of management/maintenance? Whether there are any landscape designation or townscape designation (i.e., conservation area) is also valid here.
- 5.9 The structure of this assessment will follow the GBBR Parcel reference in consecutive order.

<sup>1</sup> [National Character Area](#) DEFRA, [Surrey Landscape Character Assessment](#), Epsom and Ewell Borough: HDA April 2015

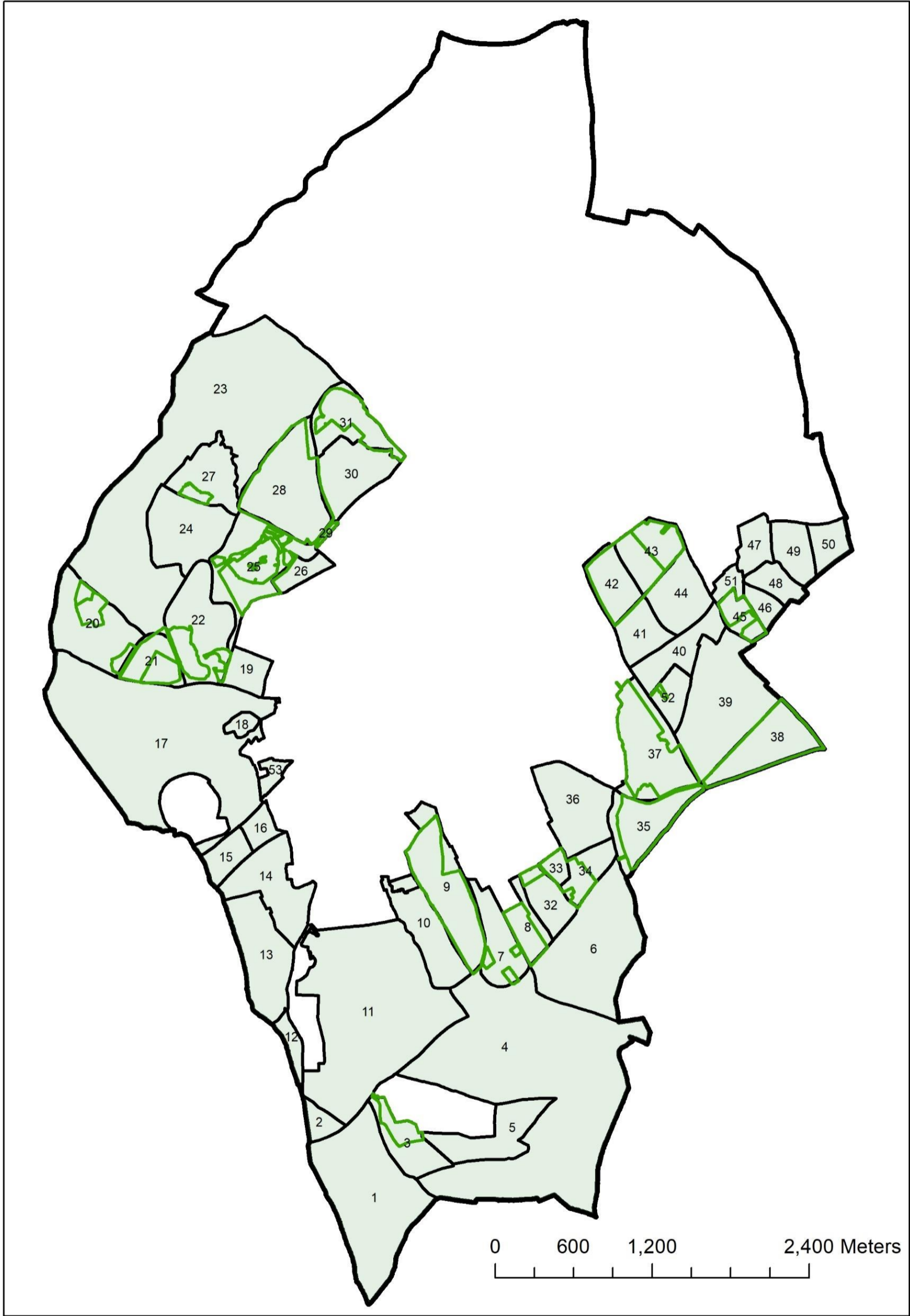


Figure 11 Map showing GBBR parcels and GB sites being promoted for future development.

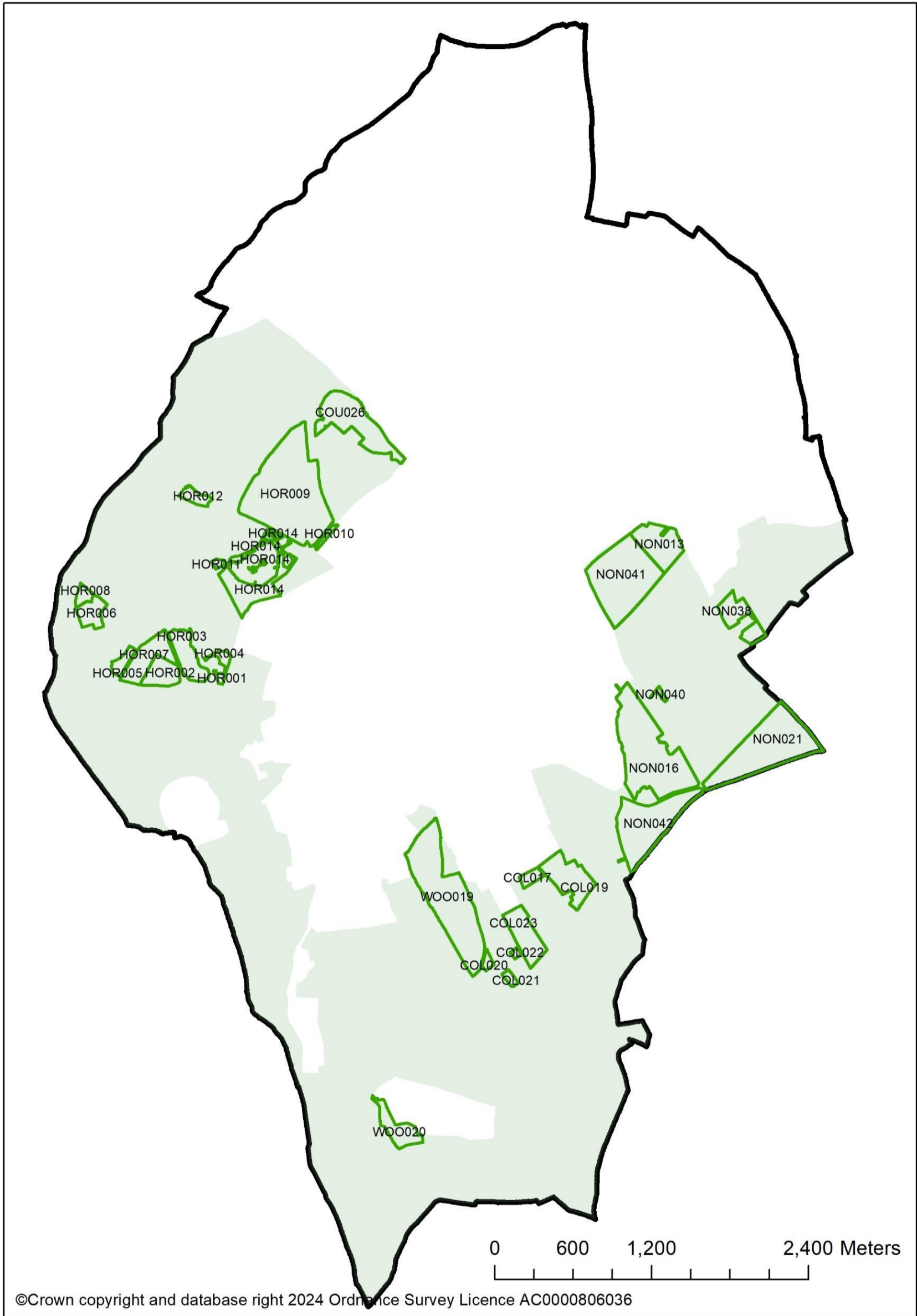
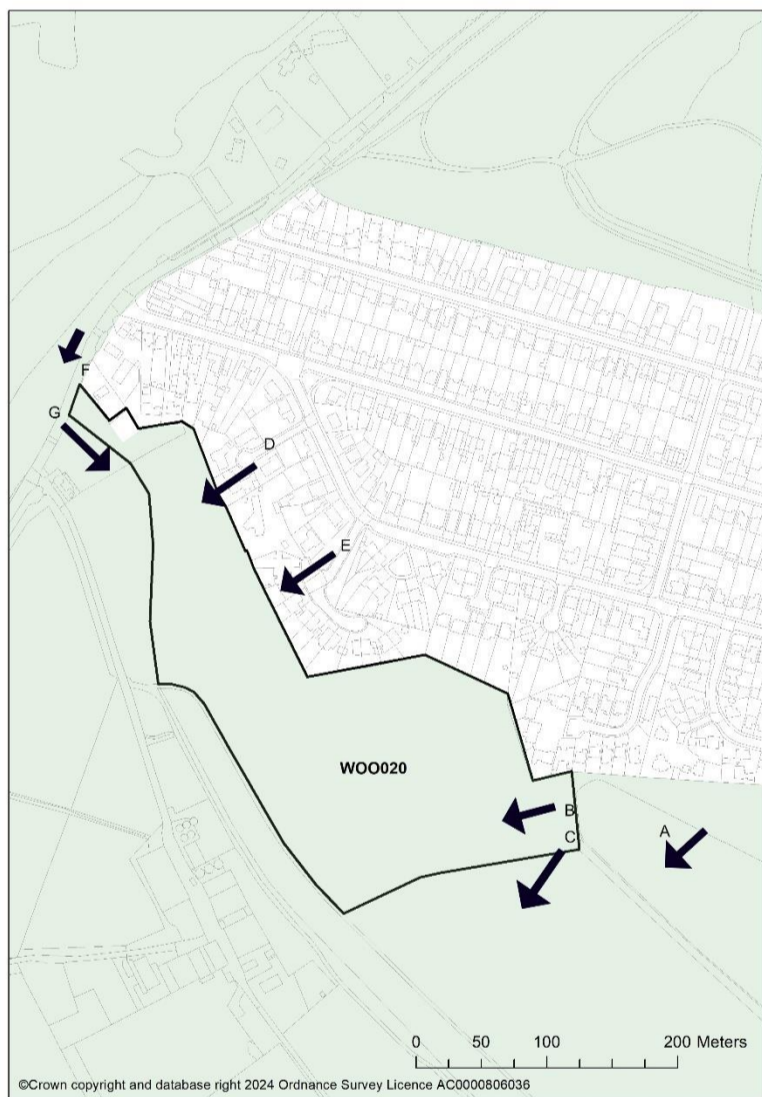


Figure 12 Map of GB sites being promoted for future development through the Land Availability Assessment

**Land North of Langley Bottom Farm (within Parcel 3)**

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P03	Land to the southwest of Langley Vale	2	1	2	5

**Land North of Langley Bottom Farm W00020**



Annotated Plan



A. Woodland area located to the southeast known as The Warren.



B. View from the SE ridge adjacent the woodland, view of rolling hills towards the south.



C. View from the SE ridge towards the west. Views of the surrounding rolling landscape.



D. View from Millers Copse. From here, there is a view of the land adjacent the site which rises behind these houses. The landform in Langley Vale reflects the surrounding rolling landscape



E. View from behind houses in Langley Close. View of the land adjacent rising again after sloping down from the site,





F. View of the site from the North, along Langley Vale Road.



G. View from Langley Vale Road, the steep valley is visible

**Current Use/Status.**

- Agricultural/arable land
- Farm buildings (outside of the site boundary).

**Area**

5ha

**Promoted for**

The site being promoted for housing development.

**Primary Constraints**

- None

**Designations**

- Area of Great Landscape Value (AGLV)
- Adjacent to woodland ancient woodland 'The Warren' with a 'blanket' Tree Preservation Order.
- Adjacent to Epsom Downs Site of Nature Conservation Importance (SNCI)

**Landscape character and relationship with the wider area**

The site is located within the National Character Area 129, Thames Basin Heaths and under the county-wide character assessment UE3: Epsom Downs. Some key characteristics of the area as a whole is sloping landform, open, exposed fields, a growing sense of remoteness to the south.

Land use is agricultural, transitioning to the wider open countryside. It also adjoins the southern settlement edge of Langley Vale. The landform forms a side of a valley, descending from 125m to 85m AOD, the lowest part along Langley Vale Road.

There are bridleways to the west and southern edge of the site and paths within the woodlands (The Warren). The area has routes which connect Headley / Walton-on-the- Hill / Epsom Downs.

This parcel falls within an Area of Great Landscape Value (AGLV). The designation extends south beyond the borough boundary. The eastern edge adjoins ancient woodland.

**Readily recognisable physical features which are likely to be permanent**

Boundaries of the site

- The site abuts the settlement boundary of Langley Vale which has a clear and regular boundary.
- The southeastern tip would follow the strong ancient woodland line.
- The southern boundary of the site does not follow a readily recognisable physical boundary, appears to be the centre point of the large field.
- The western boundary follows an access road/path running parallel to Ebbisham Lane but does not follow any physical boundary on the northern part of this edge.

The site does not currently follow a recognisable physical boundary to the south or west and therefore it would need to be achieved through the creation of new edges/boundaries through design, potentially compromising the integrity of the boundary here.

**Views**

There are views of the site from the southern edge of the Langley Vale Village settlement, specifically views from the curtilage of Grosvenor Road, Millers Copse and Langley Close.

There are views of the valley side and bottom from bridleways and footpaths that form the edge to this parcel, some of these are elevated viewpoints across the Langley Bottom Farm stead towards the countryside beyond.

**Visual sensitivity**

The site is highly sensitive due to its location and the setting it provides to both the Epsom Downs Racecourse and Langley Vale settlement. It also forms part of a transitional landscape, one side of a valley which leads into the wider countryside beyond. Elevated views from the northern edge from the edge of the woodlands and from various parts of the village (e.g. Langley Close). The site is rare and quite tranquil in the context of the wider borough as part of the Epsom Downs area.

There are longer distance views of this parcel from the Epsom Downs Racecourse and from a bridleway on elevated ground to the north and south of the site.

The site is of high landscape and visual sensitivity. This is comprised of the combined effects of this transitional landscape the amenity and sensitive nature of the viewpoints, some of which are medium to longer distance and the site forms the foreground to these views. The site is rare in the context of the wider borough as part of the Epsom Downs area and would not be readily substitutable.

**Conclusion**

Landscape and visual sensitivity are high and there is a high overall sensitivity to development where the impact on openness considered to be high.

The existing urban edge is rounded off and clearly delineated. The proposed site boundaries do not follow a recognisable feature that is likely to be permanent and is considered to be weak and would extend the urban edge in awkward manner. Therefore, the overall integrity of the Green Belt in this location would be considered compromised should the site be released from the Green Belt.

**Various sites along Downs Road (within parcel 7, 8 and 9)**

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
P08	Land to the east of Downs Road	3	2	3	8
P09	Land between Chalk Lane and Ashley Road	3	2	3	8

**Land near Downs Road -north (COL020)**



**Current Use/Status.**

Agricultural/grazing land

**Area**

0.77

**Promoted for**

Memorial Woodland as part of wider proposal with COL023

**Primary Constraints**

No

**Designations**

- Adjacent SNCI and
- Adjacent to Epsom cemetery

**Landscape character and relationship with the wider area**

The site is located within the National Character Area 129, Thames Basin Heaths and Surrey County Landscape Character Area CD1 - Ashted and Woodcote Parks Chalk Down with Woodland. Some key characteristics of the area are steep slopes, a mosaic of medium/small fields, tree belts and dispersed woodlands.

The site is a paddock, surrounded by a well-defined hedging/tree boundary of varying density/intactness. There are limited urban features. It lies adjacent to the cemetery on approach to Epsom Downs. This series of fields form part of the small-scale transition between the Epsom settlement edge and the larger scale uses on the upper slopes of Epsom Downs and the golf course use to the south.

The land uses in the area are pastoral, typical of settlement edge.

The elevated Downs to the south affords long views across Epsom towards London, within which the site forms the foreground.

Landscape sensitivity is considered high in this location.

**Readily recognisable physical features which are likely to be permanent**

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

The proposed woodland use would not require inseting from the Green Belt

**Views**

- Gaps in the vegetation along Ashley Road allow for views in/out of the site (this may vary depending on the time of the year)
- Lower hedge along the southern boundary, which allow for views in/out of the site. Open, exposed views towards Epsom Down to the South

**Visual sensitivity**

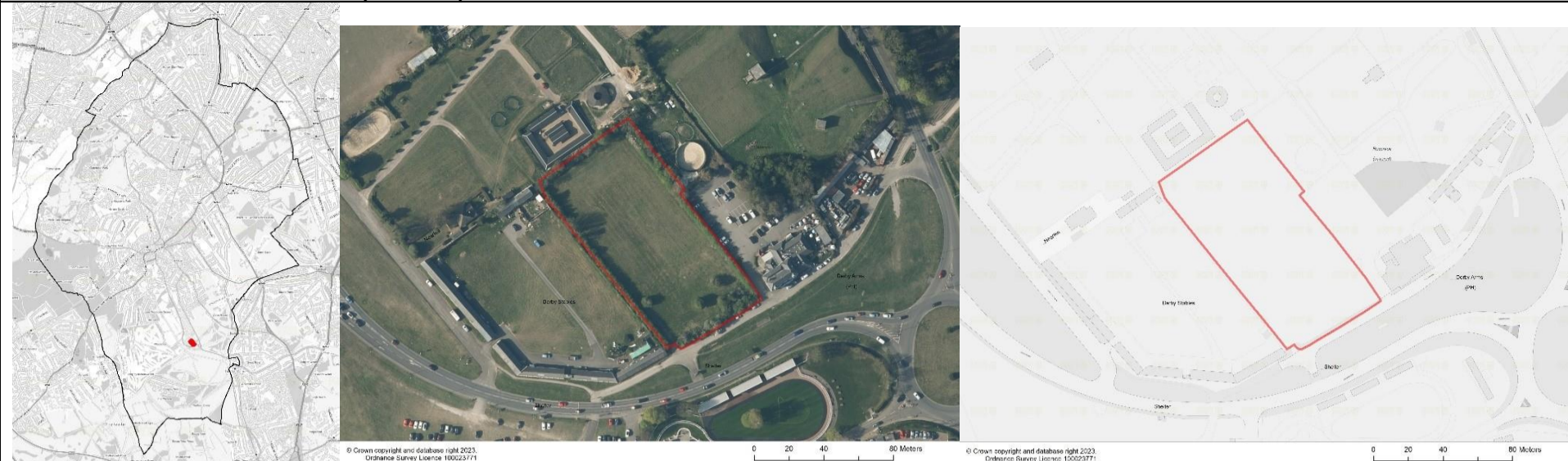
The site is highly sensitive due to its location and transitional landscape character, rising steeply to the south. It forms a series of small-scale fields which form the setting to the Downs when viewed from the settlement edge as well as marrying the settlement edge of Epsom with the wider, larger-scale landscape of Epsom Downs, especially in views from the elevated edges and viewpoints on Grandstand Road.

The visual sensitivity is considered high in this location.

**Conclusion**

Landscape and visual sensitivity are high. The site forms part of a wider proposal comprising of a number of sites, where the proposals is for this paddock to be used as a memorial woodland, which would not require inseting from the Green Belt. The site forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the southeast which, if released would undermine the integrity of the wider Green Belt in this area.

**Land near Downs Road-south (COL021)**



**Current Use/Status.**

Agricultural/grazing land

**Area**

0.8 ha

**Promoted for**

Woodland as part of wider proposal COL023

**Primary Constraints**

No

**Designations**

Adjacent listed building

**Landscape character and relationship with the wider area**

The site is located within the National Character Area 129, Thames Basin Heaths and Surrey County Landscape Character Area CD1 - Ashted and Woodcote Parks Chalk Down with Woodland. Some key characteristics of the area are steep slopes, a mosaic of medium/small fields, tree belts and dispersed woodlands.

The site is a paddock, surrounded by a well-defined hedging/tree boundary. There are limited urban features. It lies adjacent to the Derby Arms Public House and to the south are open views towards Epsom Downs. The site forms part of a series of fields that transition between the Epsom settlement edge and the larger scale uses on the upper slopes of Epsom Downs and the golf course use to the south.

The land uses in the area are pastoral, typical of settlement edge.

The elevated Downs to the south affords long views across Epsom towards London, within which the site forms the foreground.

Landscape sensitivity considered to be high.

**Readily recognisable physical features which are likely to be permanent**

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

The proposed woodland use would not require inseting from the Green Belt

**Views**

The site is surrounded by dense hedging and there are limited views in and out

**Visual sensitivity**

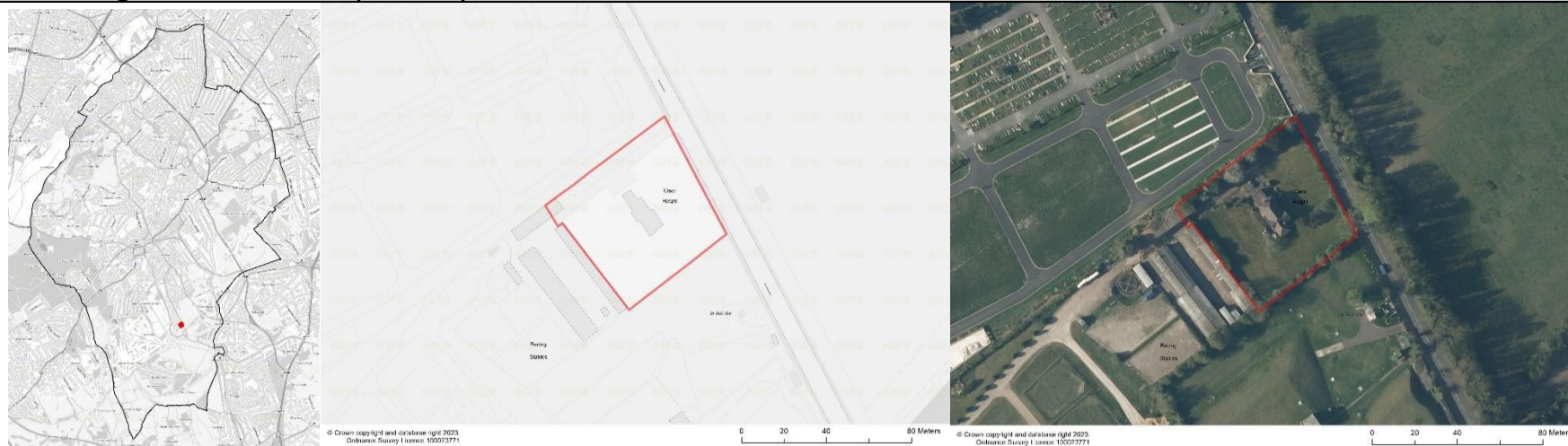
The site is highly sensitive due to its location and transitional landscape character, it forms a series of small-scale fields which form the setting to the Downs when viewed from the settlement edge as well as marrying the settlement edge of Epsom with the wider, larger-scale landscape of Epsom Downs, especially in views from the elevated edges and viewpoints on Grandstand Road.

Visual sensitivity considered to be high.

**Conclusion**

Landscape and visual sensitivity are high. The site forms part of a wider proposal comprising of a number of sites, where the proposals is for this paddock to be used as a memorial woodland, which would not require inseting from the Green Belt. The site forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the southeast which, if released would undermine the integrity of the wider Green Belt in this area.

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



**Current Use/Status.**

Residential

**Area**

0.4 ha

**Promoted for**

Housing

**Primary Constraints**

No

**Designations**

- Adjacent to SNCI
- Adjacent to Epsom cemetery

**Landscape character and relationship with the wider area**

The site is located within the National Character Area 129, Thames Basin Heaths and Surrey County Landscape Character Area CD1 - Ashted and Woodcote Parks Chalk Down with Woodland. Some key characteristics of the area are steep slopes, a mosaic of medium/small fields, tree belts and dispersed woodlands.

The site is residential property, surrounded by a well-defined property boundary, lined with hedging/tree boundary. The site is a large two storey property. The site sits within a series of fields that transition between the Epsom settlement edge and the larger scale uses on the upper slopes of Epsom Downs and the golf course use to the south.

The land uses in the area are pastoral, typical of settlement edge.

**Readily recognisable physical features which are likely to be permanent**

Property boundary, with well defined, mature hedging regular boundary.

The site is small, inseting the site may encourage the ebbing away of the boundary and compromise the integrity of the boundary here.

**Views**

The site is surrounded by dense hedging and there are limited views in and out

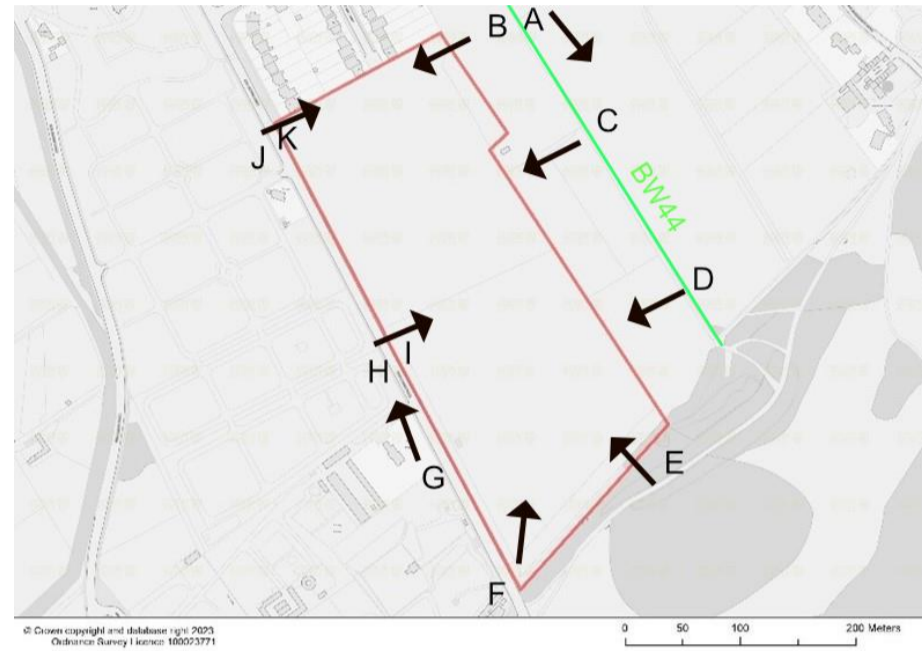
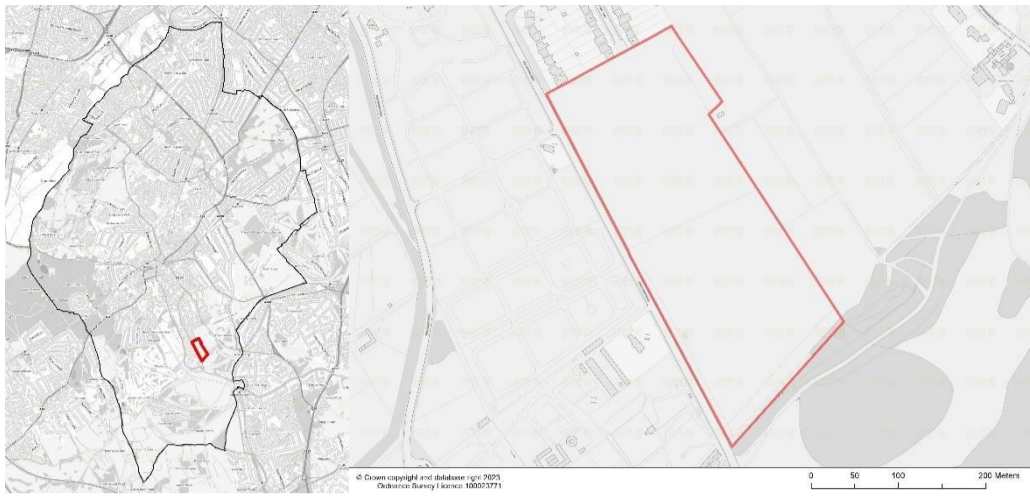
**Visual sensitivity**

The site itself is not particularly sensitive and is fairly self-contained behind the vegetated boundary, however its location sits within a transitional landscape character, between the settlement edge of Epsom with the wider, larger-scale landscape of Epsom Downs.

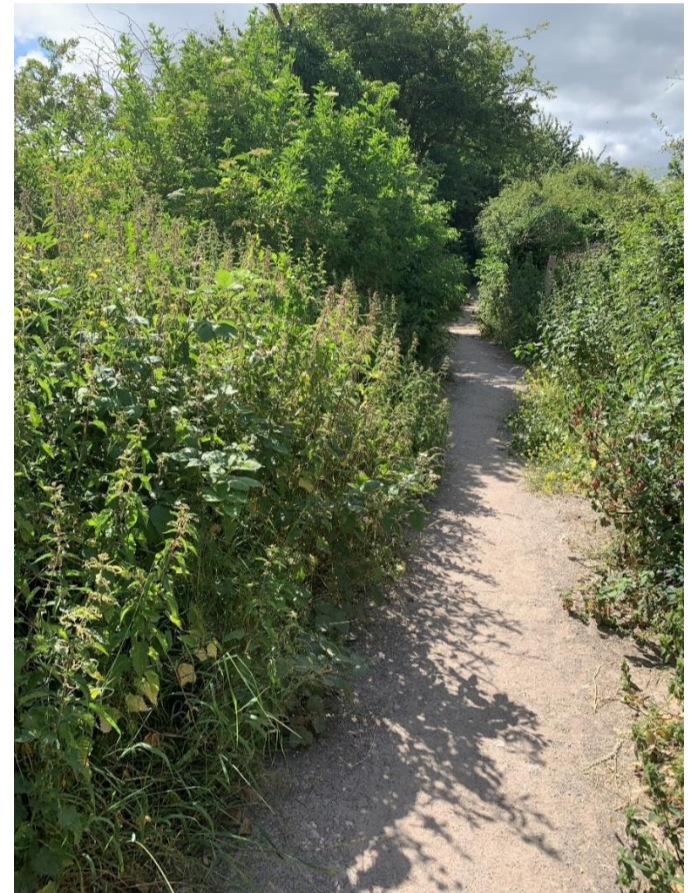
**Conclusion**

The site forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the south east which, if released would undermine the integrity of the wider Green Belt in this area.

Land near Downs Road-east (COL023)



Annotated plan



A. View south from Bridleway 44 (also known as Rifle Butts Alley), to the east of the site



B. View from Bridleway 44 to the West, area to the north of the site



C. View from Bridleway 44 to the West. This is the view of the filed and eastern tree boundary of the site. The site itself is not visible here.



D. Another view from Bridledway 44 to the West. This is the view of the filed and eastern tree boundary of the site. The site itself is not visible here.



E. View north towards the site from the southern path adjacent Epsom Golf Course. Dense vegetation, little can be seen of the site but glimpse of the distant horizon line and rolling hills to north



F. Access onto the site from the S/W corner, off Downs Road. View north, horizon line, distant landscape



G. View from Downs Road. Dense vegetation along the Road screens the site. There is no pavement on eastern side of Downs Road



H. Access to the site from Downs Road-central gate



I. View of the site from the central gate along Downs Road



J. Access from the NE access gate onto the site from Downs Road



K. View from NE gate from Downs Road

**Current Use/Status.**

Agricultural/grazing land

**Area**

7.21 ha

**Promoted for**

Housing

**Primary Constraints**

No

**Designations**

Adjacent to a number of SNCIs

Adjacent to Epsom cemetery

**Landscape character and relationship with the wider area**

The site is located within the National Character Area 129, Thames Basin Heaths and Surrey County Landscape Character Area CD1 - Ashted and Woodcote Parks Chalk Down with Woodland. Some key characteristics of the area are steep slopes, a mosaic of medium/small fields, tree belts and dispersed woodlands.



The site sits in the context of Epsom Downs golf course and the wider Downs. It sits on higher ground and forms the settlement edge of Epsom. This series of fields form part of the small-scale transition between the Epsom settlement edge and the larger-scale uses on the upper slopes of Epsom Downs and the golf course use to the immediate south of the land parcel. Land to the west is a large Cemetery extending from Treadwell Road down to the south to the edge of The Downs.

The land uses in the area are pastoral, typical of settlement edge land. The aspect of the site is north-east facing and there is a significant change in level rising up towards the south (towards the Downs), the land rises from approximately 95m (at the northern part of the site) to 125 AOD (the southern edge of the site). There are limited urban features within these small-scale fields, although views of the adjacent residential properties can be seen at various parts of the site. The surrounding hedgerows/tree belt are fairly tight but there are gaps in the vegetation allow for views into the site.

The elevated Downs to the south affords long views across Epsom towards London, within which the site forms the foreground. Additionally, due to the elevation, there is inter-visibility with the surrounding areas.

Landscape sensitivity considered to be high in this location.

#### **Readily recognisable physical features which are likely to be permanent**

- The eastern boundary follows the historic hedge line / tree belt line. There is a field between the site and Bridleway BW44, known as 'Rifle Butts Way' located to the east, parallel to the eastern boundary of the site.
- Downs Road (B289) to the west which is well defined by a mature hedgerow and providing containment;
- The northern boundary of this parcel is defined by residential boundaries (Downs Way) and some limited vegetated cover.
- The southern boundary is well defined with a historic hedge line / tree belt and path between the site and Epsom Golf course to the south.

Changing the boundary of the GB in this location would extend the built up limits may compromise the integrity of the GB in this location.

#### **Views**

- Views across the site towards Burgh Heath Road e.g. stables
- Views from Downs Road, Downs Way and Aston Way looking up hill towards Epsom Downs
- Views from PROW Rifle Butts Alley, although limited due to a field and hedge/treeline separating the PROW and the site
- Views from Downs Way

#### **Visual sensitivity**

The site is highly sensitive due to its location and transitional landscape character, It forms a series of small- scale fields which give setting to the Downs when viewed from the settlement edge as well as marrying the settlement edge of Epsom with the wider, larger-scale landscape of Epsom Downs.

The site has an overall High Sensitivity to development, combining the values set out for Landscape and Visual Sensitivity. This is comprised of the combined effects of this portion of transitional landscape, the amenity it affords the settlement edge of Epsom and the extensive inter-visibility. This site is close to a number of SNCIs.

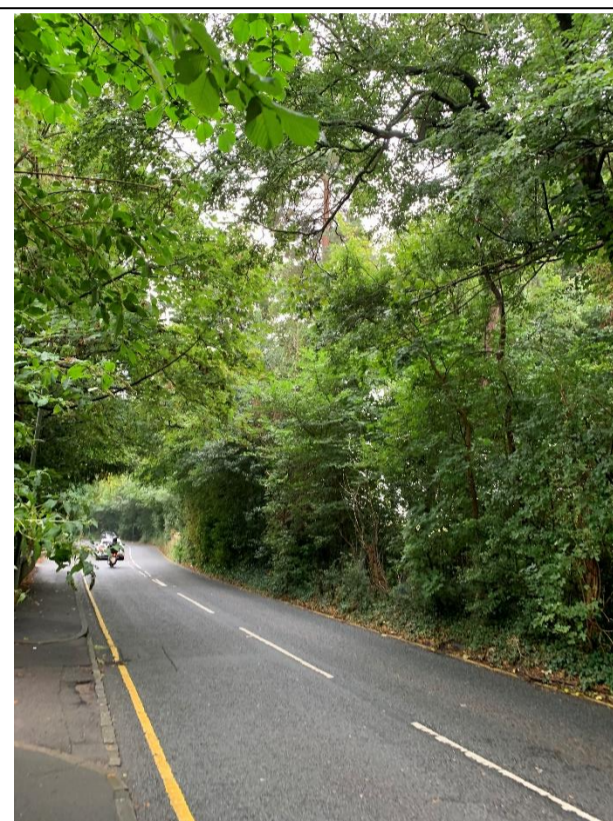
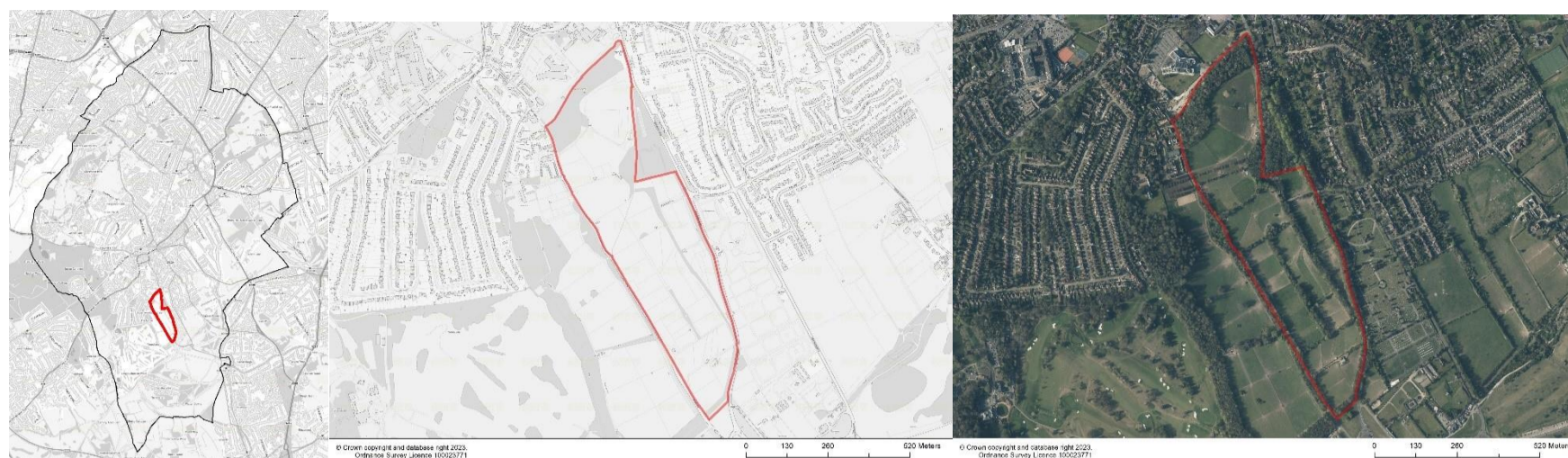
#### **Conclusion**

Landscape and visual sensitivity are high.

The existing urban edge is clearly delineated and even. The proposed site boundaries would extend the urban edge further south potentially compromising the overall integrity of the Green Belt in this location should the site be released from the Green Belt.

The parcel also forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the south east which, if released would undermine the integrity of the wider Green Belt in this area.

**Land near Downs Road-west (WOO019)**



View from Ashley Road. Pavement on one side of the road, No pavement on side of the road next to the site. Heavily vegetated boundary restricts views onto the site



**Current Use/Status.**

Trees and paddocks

**Area**

28.53 ha

**Promoted for**

Retained paddocks with new footpaths, linked to COL023

**Primary Constraints**

No

**Designations**

- Blanket TPO over most of the site,
- Areas of archaeological importance to the north
- Adjacent Chalk Lane Conservation Area
- Adjacent to Epsom cemetery

**Landscape character and relationship with the wider area**

The site is located within the National Character Area 129, Thames Basin Heaths and Surrey County Landscape Character Area CD1 -

Ashtead and Woodcote Parks Chalk Down with Woodland. Some key characteristics of the area are steep slopes, a mosaic of medium/small fields, tree belts and dispersed woodlands.

The site is a large area consisting of a series of paddocks/fields located on the western side of Ashley Road (B290). This section of Ashley Road has no pavement on the western side- adding to the more edge of settlement character of the area. The site is divided into a number of paddocks by a number of historic hedgerows. The site is surrounded by a well defined hedging/tree boundary of varying intactness allowing for views in/out of the site.

The land uses in the area are pastoral, typical of settlement edge.

**Readily recognisable physical features which are likely to be permanent**

- To the east and moving south Ashley Road (B290), well defined tree/hedge line, with brick wall along parts of the southern section
- The southern boundary is well defined by tree belt, that leads to a open green space that leads to Epsom Downs
- The western boundary is well defined by vegetated edge along Chalk Lane, an unmarked narrow Lane with no pavement.
- The northern boundary of this parcel is defined by a dense tree belt and property boundary adjacent Woodcote Grove.

**Views**

- Views of the site from Ashley Road through gaps in the vegetation
- Views of the site from Chalk Lane through gaps in the vegetation

**Visual sensitivity**

The site is highly sensitive due to its location and transitional landscape character. It forms a series of small- scale fields which give setting to the Downs when viewed from the settlement edge as well as marrying the settlement edge of Epsom with the wider, larger-scale landscape of Epsom Downs.

This site is close to a number of SNCIs.

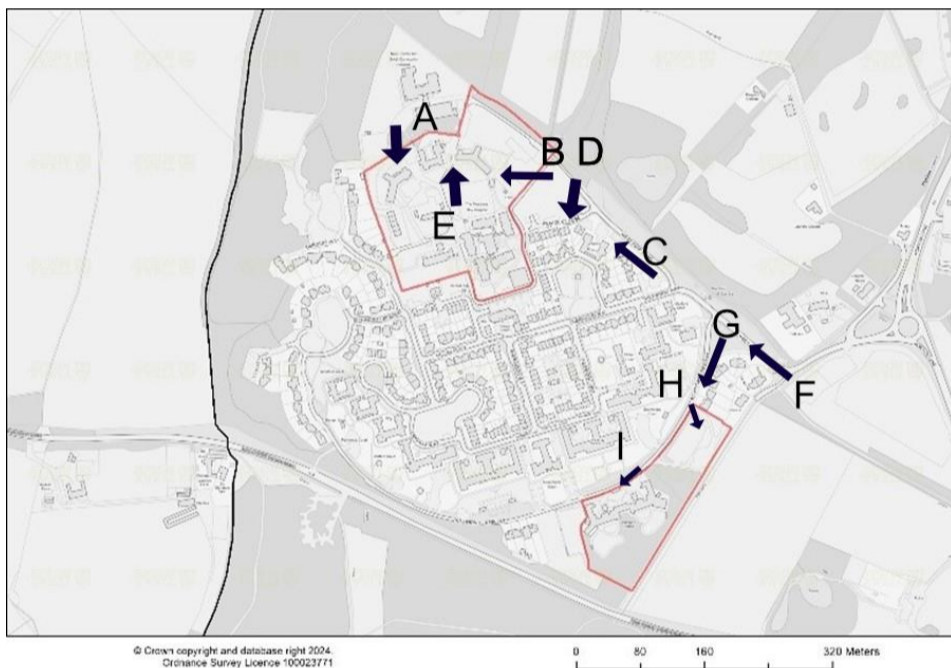
**Conclusion**

Landscape and visual sensitivity are high. The site forms part of a wider proposal comprising of a number of sites, where the proposals is for these paddocks to be retained with new footpaths, which would not require inseting from the Green Belt. The site forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the south east which, if released would undermine the integrity of the wider Green Belt in this area.

**Epsom Community Hospital (within Parcel 20)**

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

**West Park LAA Reference HOR005 and HOR006 (former LAA reference STA017, STA018)**



Annotated Map



A. View looking south onto the site from the north. Derelict shed on the edge of the site, next to now unused car park



B. NHS buildings, on site HOR006 mainly single storey but there is a two storey building on the site. Land levels vary on the site



C. View towards the north west from West Park Road



D. View of the adjacent open space/play area east of HOR006



E. Two storey building located centrally on site HOR006



F. Entrance to West Park



G. View looking south down Richmond Crescent Road. Large footprint, three storey buildings.



H. Car park on the southern parcel



I. NHS buildings on the southern parcel

**Current Use/Status.**

Currently in NHS use (within the context of a wider residential area and parkland setting)

- The Cottage Hospital and 'The Poplars Physiotherapy Centre'.
- Clinical hospital uses including the 'Community Team for People with Learning Disabilities'.

NHS uses sits

**Area**

1.47 ha

**Promoted for**

The site being promoted for future development for residential on the existing footprint

**Primary Constraints**

- No

**Designations**

- Major developed sites in the Green Belt (See Section 2)
- Conservation Area
- Listed building
- Contaminated land

- TPOs (individual and grouped)

#### Landscape character and relationship with the wider area

The area is West Park residential area and remaining clinical uses. These areas contain existing built development within the Green Belt. Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area LF4, forming part of the north-western edge to the settlement of Epsom.

LF4 Horton Rolling Clay Farmland excludes the built-up parts of the parcel, so the surrounding landscape is described as gently rolling landscape, surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The site is also influenced by the adjoining Surrey Landscape character area, LW3 Ashtead and Epsom Commons Clay Woodland to the immediate south on the other side of Christ Church Road. Where the key characteristics include undulating landscape, woodlands, common land and tree cover that obscures views. The lack of urban influence in this adjoining area provides for a sense of tranquility and remoteness.

The site levels on HOR006 varies with slopes and steps to the various buildings. The area generally sits higher to the northern tip moving west. Overall the wider West Park area ranges 50-60m AOD, increasing in elevation to the west where the land becomes more pronounced in its undulations, as it rises and transitions towards the agricultural land to the north and west of the parcel.

The overall wider landscape structure to the western end is extensive parkland which transitions to the agricultural fields beyond, gently undulating moving westwards.

The residential development and the remaining hospital uses are within a clearly defined landscaped parkland setting. Overall, the landscape is designed and well managed. There is limited sense of remoteness or tranquility, but there is the visual connection to the wider landscape from the edges of the West Park grounds with views out along certain points (depending on the time of year when the vegetation becomes dormant the views are more prominent).

The site itself consists of built development of and little in terms of open landscape, although appreciate it's location next to the conservation area.

Overall landscape sensitivity is low

#### Readily recognisable physical features which are likely to be permanent

The sites, HOR005, HOR006 and HOR008 are within a Major Developed Site in the GB known as West Park, which is assessed in section 2 for potential insetting, therefore the potential boundary is considered in the context of the wider West Park area

- The eastern boundary is defined by tree belts and slopes down towards a PROW/Footpath runs along the edge
- The northern boundary is defined by the PROW/Footpath, tree belt and field boundary and the edge of the hospital uses, enclosed by metal fencing and property lines.
- The western boundary is an agricultural field boundary with a substantial line of mature hedgerow trees and property lines.
- The south-western boundary is formed by a tree belt along Christ Church Road (the B280), which is also the edge of the Epsom and Ashtead Commons to the immediate south.

The area of West Park has been assessed for potential insetting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for insetting.

#### Views

- Views from B280, from the entrance along Christ Church Road, and intermittent glimpses through into the residential parts of the site through gaps in the otherwise dense vegetation.
- Glimpse of the wider landscape from West Park Road towards the East
- Views within the West Park

#### Visual sensitivity

The landscape of area is set within a high quality parkland setting and adjacent to a conservation area.

The relationship of this parcel to the surrounding landscape is important to consider.

Visual sensitivity is considered to be moderate.

#### Conclusion

The quality of the surrounding landscape here is high and well managed however most of the site is PDL and little open area. Therefore landscape sensitivity is low.

The buildings sit neatly within a parkland setting and site sits adjacent to a Conservation Area.

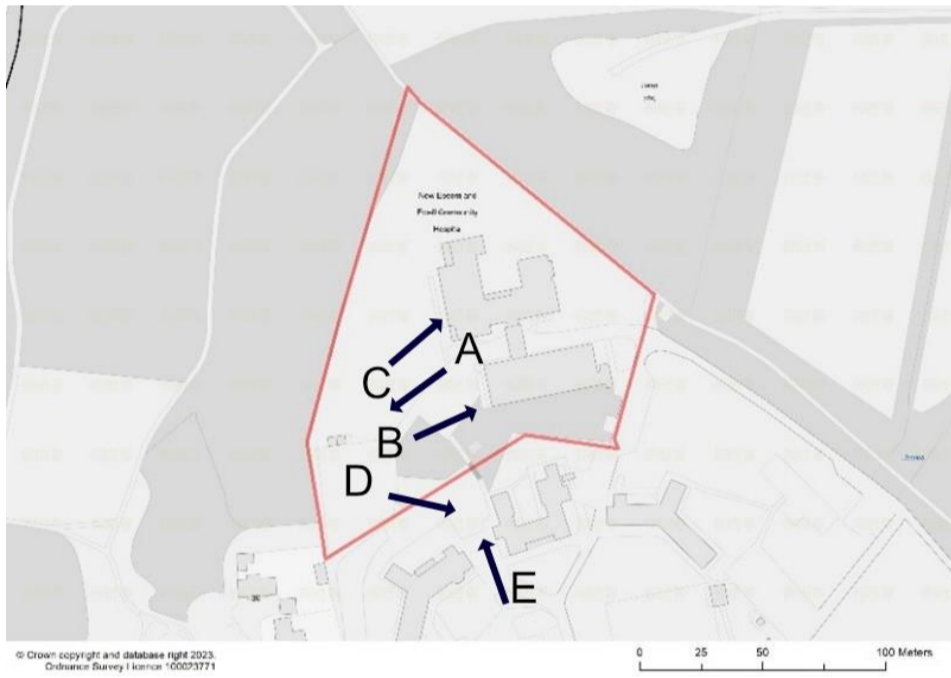
The site is fairly self contained, although glimpse of the wider landscape is visible from some of the edge.

The area of West Park has been assessed for potential insetting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for insetting.

**Epsom Community Hospital (within Parcel 20)**

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

**West Park LAA Reference HOR008**



A. Derelict car park to the west of the site



B. View east from the car park towards derelict buildings



C. View east from the car park to derelict buildings



D. View south/east towards site HOR006



E. View north from site HOR006 view, can see the Scotts Pines on HOR008 in the distance.

**Current Use/Status.**

Currently in NHS use.

- The Cottage Hospital and 'The Poplars Physiotherapy Centre'.
- Clinical hospital uses including the 'Community Team for People with Learning Disabilities'.

NHS uses sits within the context of residential uses within a parkland setting

**Area**

Northern site 3.7 ha

Southern site 1.97 ha

**Promoted for**

The site being promoted for future development for residential on the existing footprint

**Primary Constraints**

- No

**Designations**

- Major developed sites in the Green Belt (see section 2)
- Conservation Area
- Listed building
- Contaminated land
- TPOs (individual and grouped)

**Landscape character and relationship with the wider area**

The area is West Park residential area and remaining clinical uses. These areas contain existing built development within the Green Belt. Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area LF4, forming part of the north-western edge to the settlement of Epsom.

LF4 Horton Rolling Clay Farmland excludes the built-up parts of the parcel, so the surrounding landscape is described as gently rolling landscape, surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The site is also influenced by the adjoining Surrey Landscape character area, LW3 Ashted and Epsom Commons Clay Woodland to the immediate south on the other side of Christ Church Road. Where the key characteristics include undulating landscape, woodlands, common land and tree cover that obscures views. The lack of urban influence in this adjoining area provides for a sense of tranquility and remoteness.

The site levels on HOR008 is generally flat with slopes and steps to the adjoining site HOR006. The site generally sits higher than the surrounding area. Overall the wider West Park area ranges 50-60m AOD, increasing in elevation to the west where the land becomes more pronounced in its undulations, as it rises and transitions towards the agricultural land to the north and west of the parcel.

The overall landscape structure to the western end is extensive parkland which transitions to the agricultural fields beyond, gently undulating moving westwards. The site itself consists of built development which are no longer in use and has the appearance of neglect.

Whilst the overall parkland landscape is designed and well managed. The landscape sensitivity is considered to be low.

**Readily recognisable physical features which are likely to be permanent**

HOR005, 6 and 8 sit within a Major Developed Site in the GB known as West Park, which is assessed in section 2 for potential inseting, therefore the potential boundary is considered in the context of the wider West Park area

- The eastern boundary is defined by tree belts and slopes down towards a PROW/Footpath runs along the edge
- The northern boundary is defined by the PROW/Footpath, tree belt and field boundary and the edge of the hospital uses, enclosed by metal fencing and property lines.
- The western boundary is an agricultural field boundary with a substantial line of mature hedgerow trees and property lines.
- The south-western boundary is formed by a tree belt along Christ Church Road (the B280), which is also the edge of the Epsom and Ashted Commons to the immediate south.

The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.

**Views**

- Views from B280, from the entrance along Christ Church Road, and intermittent glimpses through into the residential parts of the site through gaps in the otherwise dense vegetation.
- Glimpse of the wider landscape from West Park Road towards the East
- Views within the residential area and parkland



**Visual sensitivity**

The adjacent landscape of this site is well managed and maintained, where residential and NHS uses are within a high quality parkland setting and conservation area.

However the site is PDL and currently derelict, with a neglected appearance The visual sensitivity is considered to be low.

**Conclusion**

Whilst the buildings adjacent a parkland setting where the quality of the landscape here is high and well managed. The site itself consists of built development that has become derelict and has a neglected appearance.

The site is fairly self contained, although glimpse of the wider landscape is visible from various points along the boundary edge.

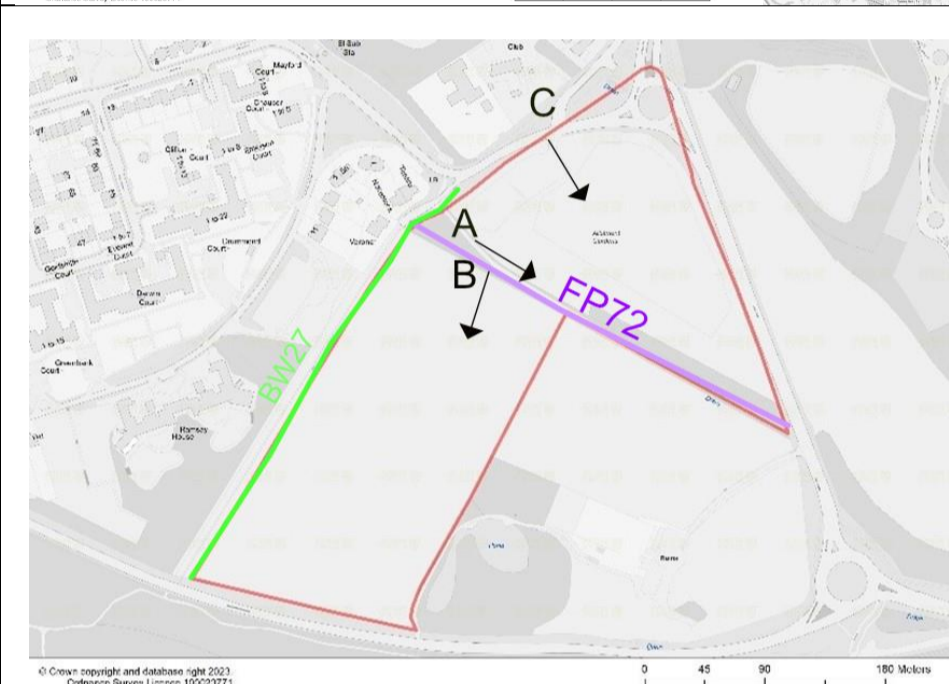
Landscape and visual sensitivity considered to be low

The area of West Park has been assessed for potential insetting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for insetting.

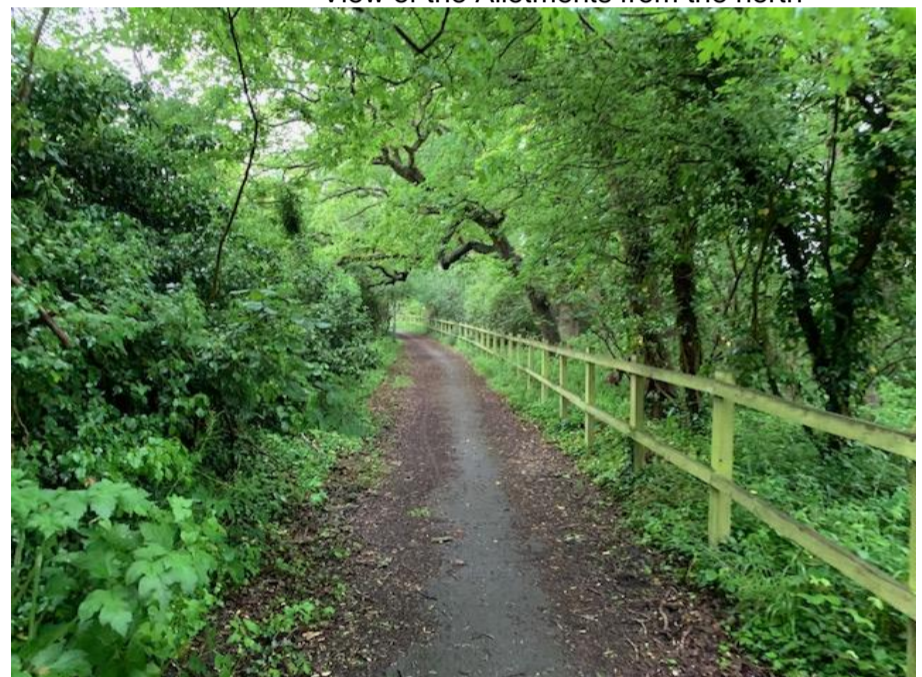
**Noble Park Extension and Hollywood Lodge (within Parcel 21)**

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

**Nobel Park extension (LAA reference HOR007)**



View of the Allotments from the north



A. View along footpath



B. View of southern field from footpath



C. Allotments in the northern portion of the parcel.

**Current Use/Status.**

An isolated agricultural field, also to the south and west of the parcel.

**Area**

7.32 ha

**Promoted for**

The sites within the parcel are being promoted for future development.

**Primary Constraints**

- No

**Designations**

- West Park Conservation Area.

- Some significant tree belts with group TPOs.
- Land to the south is designated as a Local Nature Reserve and Site of Special Scientific interest (SSSI) and forms part of Epsom Common.

#### **Landscape Character and relationship with the wider area**

Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area - LF4 Horton Rolling Clay Farmland landscape is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The uses comprise allotments and a degraded landscape associated with the derelict Hollywood Lodge. Existing vegetation is overgrown. In general, little is visible from the footpath, the whole parcel, including the Hollywood Lodge to the east (HOR002) has a neglected appearance. The southern boundary, eastern boundary and PROW footpath that bisects the parcel are covered by group TPO.

There is little influenced by the nearby former settlement edge of Epsom, however the site does relate to the wider developments of the Epsom hospitals cluster sites, with connection to the green infrastructure.

In general landscape sensitivity is low, existing trees and boundary vegetation requiring management. There is limited sense of tranquillity and limited visual connection to the wider landscape from the parcel itself.

#### **Readily recognisable physical features which are likely to be permanent**

The allotment boundary is defined by Horton Lane/West Park Road and footpath 72 bounded by a mature lines of trees which relate to former agricultural boundaries. Footpath FP72 bisects the site, connecting West Park Road and Horton Lane.

The south-western boundary is Christ Church Road (the B280) and strong tree belt along the road edge. Epsom Commons are located across the road to the immediate south.

Bridleway BW27 located along the western boundary.

Clearly defined tree belt in the centre, running parallel to BW27.

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.

The high score at stage 1 is noted

#### **Views**

The viewpoints from PROW FP 72, which bisects the parcel, between West Park Road and Horton Lane.

The site is quite self contained, limited views in and out.

#### **Visual sensitivity**

Landscape sensitivity is generally of low sensitivity and parts of the site has a general neglected appearance. Although site is located within conservation area, site has been unmanaged/maintained. Landscape and Visual changes associated with development could improve the landscape condition.

The site is fairly contained and limited views of the parcel. Glimpses of views towards parts of the site which are fenced off.

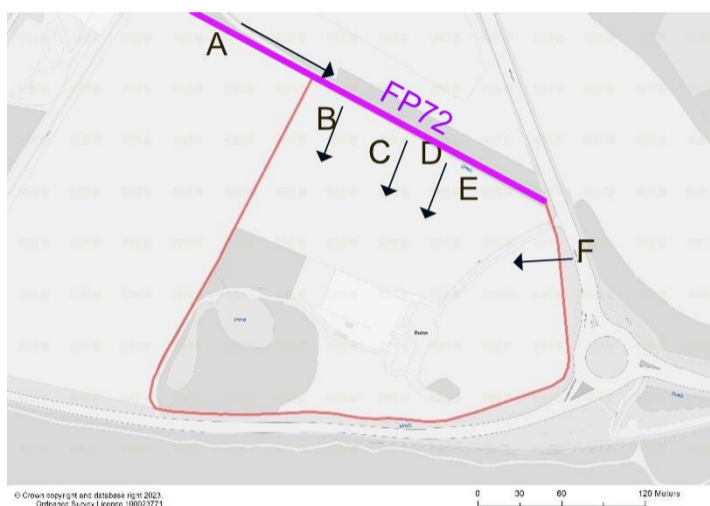
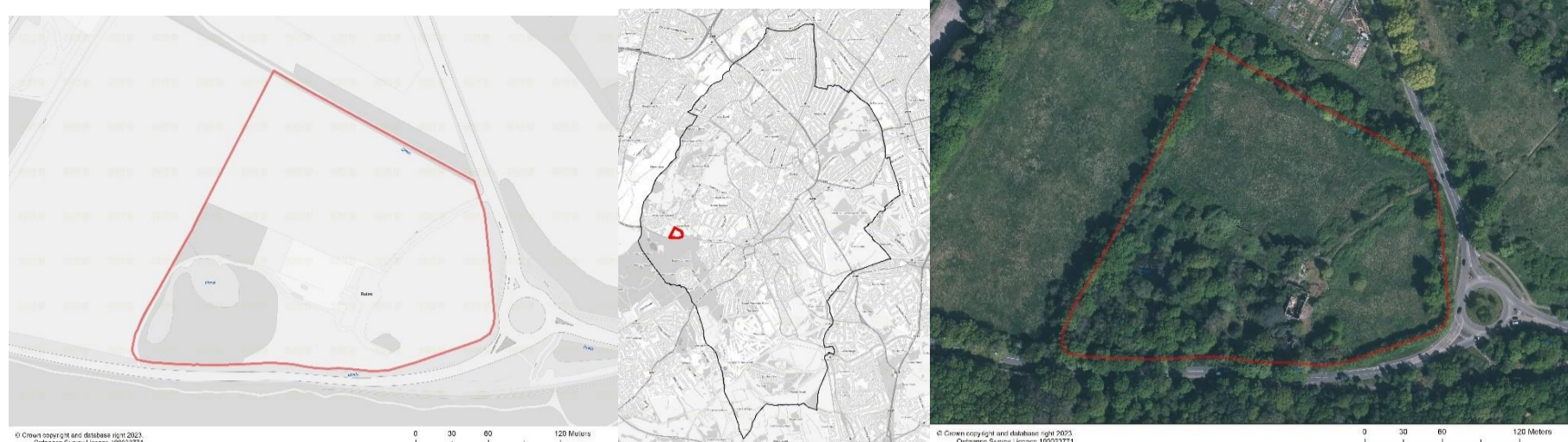
Landscape sensitivity is considered to be low

#### **Conclusion**

Landscape and visual sensitivity are generally low. Although note the higher score in the GBS Stage One.

The development of the parcel would move development closer to Christ Church Road (the B280), removing a gap between the built up parcel. Although the importance of the gap is considered more on a localised scale as there is built development on either on both sides.

Hollywood Lodge (LAA reference HOR002)



A. View along footpath (FP72) north of the site



B. Glimpses of the site from gaps in the hedge line from the footpath



C. The former building and structures are visible



D. Buildings and structures have been vandalised with graffiti



E. Graffiti on buildings



F. View of the building from Horton Lane.

**Current Use/Status.**

Derelict land former property known as 'Hollywood Lodge'

**Area**

4.9 ha

**Promoted for**

The sites within the parcel are being promoted for future development.

**Primary Constraints**

- No

**Designations**

- West Park Conservation Area.
- Some significant tree belts with group TPOs.
- Land to the south is designated as a Local Nature Reserve and Site of Special Scientific interest (SSSI) and forms part of Epsom Common.

**Landscape Character and relationship with the wider area**

Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area - LF4 Horton Rolling Clay Farmland landscape is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

Hollywood Lodge was a former large house set within open grounds used by the Health Authorities., now derelict and has been subject to vandalism.

Existing vegetation is overgrown. In general the whole parcel has a neglected appearance. The southern boundary, eastern boundary and footpath 72 that bisects the parcel are covered by group TPOs.

There is little influenced by the nearby former settlement edge of Epsom, however the site does relate to the wider developments of the Epsom hospitals cluster sites, with connection to the green infrastructure.

In general landscape sensitivity is low, with derelict buildings and existing trees and roadside vegetation are overgrown and require management. There is limited sense of remoteness or tranquillity and limited visual connection to the wider landscape from the parcel itself.

**Readily recognisable physical features which are likely to be permanent**

Footpath FP72 to the north

To the east is a tree belt along Horton Lane

The southern boundary is Christ Church Road (the B280) and strong tree belt along the road edge (Epsom Commons are located across the road to the immediate south).

The western boundary is a well defined hedge/tree belt boundary

The site adjoins site HOR007 to the west which is considered above

**Views**

- Various viewpoints from PROW FP 72 where there are gaps in the boundary
- View from Horton Lane through gap in the boundary.

**Visual sensitivity**

Landscape sensitivity is generally of low sensitivity and has a general neglected appearance. Landscape and Visual changes associated with development could improve the landscape condition.

The site is fairly contained and limited views of the parcel. Glimpses of views from gaps in the boundary

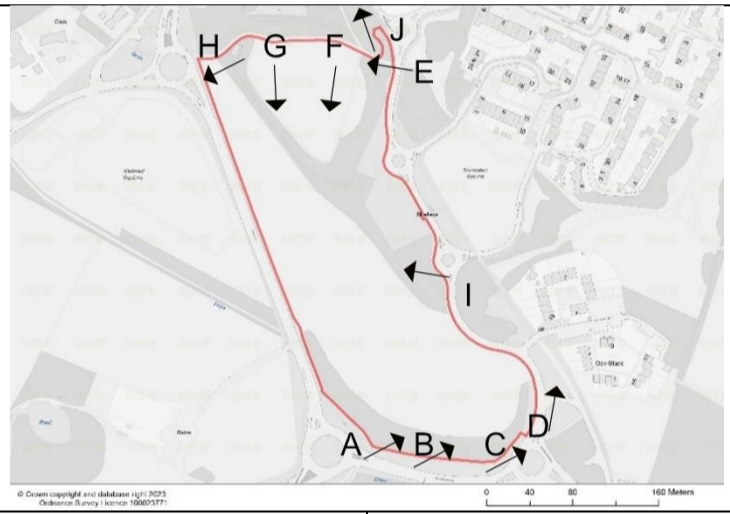
**Conclusion**

Landscape and visual sensitivity are generally low. Although note the higher score in the GBS Stage One. The development of the parcel would move development closer to Christ Church Road (the B280), removing a gap between the built up parcel. Although the importance of the gap is considered more on a localised scale as there is built development on either on both sides.

**Manor Park and Cuddington Glade (within Parcel 22)**

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

**Manor Park (LAA reference HOR003)**



A. View from Christ Church Road. Dense vegetation limits views in



B. View from Christ Church Road. Scrub/Dense vegetation



C. View from Christ Church Road part screened by high fence, which limits the view into the site



D. View East from Christ Church Road, toward Oak Glade



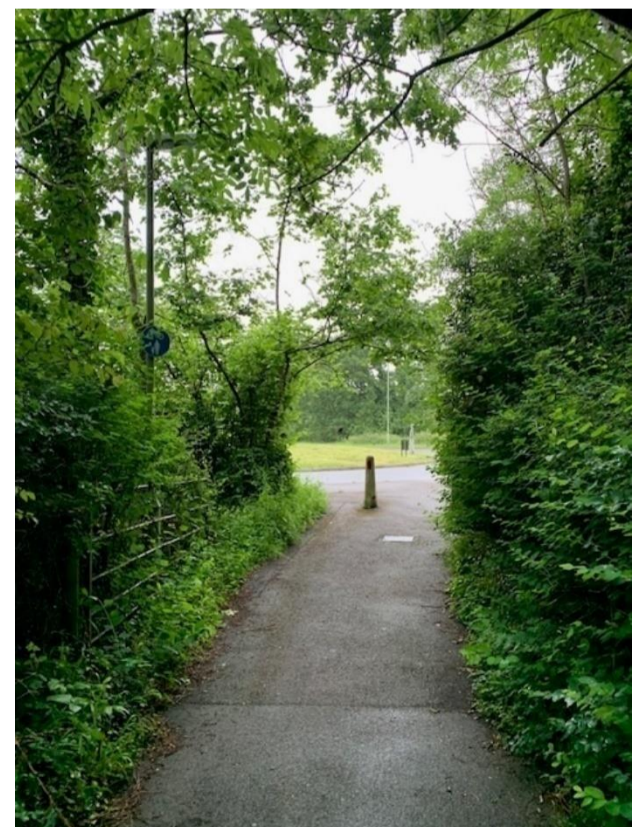
E. Entrance to footpath north/east of the site



F. Open semi natural space to the north, view from the footpath



G. Open semi natural space to the north, view from the footpath



H. Entrance to footpath north/west of the site



I. Amenity green space east, along Chertsey Lane



J. View north from Chertsey Lane towards Phoenix Close

**Current Use/Status.**

Open space

**Area**

6.2 ha

**Promoted for**

Promoted for future residential development.

**Primary Constraints**

- No

**Designations**

- Manor Conservation Area
- Various tree belts and individual trees with TPOs.
- Adjacent to Site of Special Scientific interest (SSSI) and is part of Epsom Common to the south Christ Church Road

**Landscape character and relationship with the wider area**

Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area - LF4, Horton Rolling Clay Farmland is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The existing uses include amenity grassland, open space with vegetated edges. Significant tree coverage, many are protected (TPO). Some mown grassland but largely semi-natural state.

The landscape is self contained and in terms of exposure, is not particularly sensitive. However it's semi natural qualities does 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. New build development is scattered in a semi rural setting and generally hidden from view from the edges. There is a limited sense of remoteness or tranquility and limited due to the vicinity of modern development and the heavily trafficked road to the south (Christ Church Road B280).

Overall landscape sensitivity considered to be low.

**Readily recognisable physical features which are likely to be permanent**

- Northern boundary-Existing footpath to the north running east and west between Horton Lane and Chertsey Lane.
- Western boundary-Horton Lane, which consists of a well defined, vegetated edge and fencing
- Eastern boundary- the winding Chertsey Lane, which is also a well defined, vegetated edge.
- Southern boundary- Christ Church Road, which is also a well defined, vegetated edge and also fenced off

**Views**

Views into the site are mainly from the north and glimpses into the site via gaps the otherwise continuous vegetated boundary on the western boundary. The vegetation with the fencing on the south and east screen the site from view along these edges. Therefore restricting views in and out. The site is divided by tree belt, creating a small semi natural open space to the north of the site.

**Visual sensitivity**

The landscape has a semi natural, woodland character and part of the site is located within a conservation area. The area is self contained so in terms of exposed views is generally limited. However the semi natural quality of the space connects with the townscape/built development.

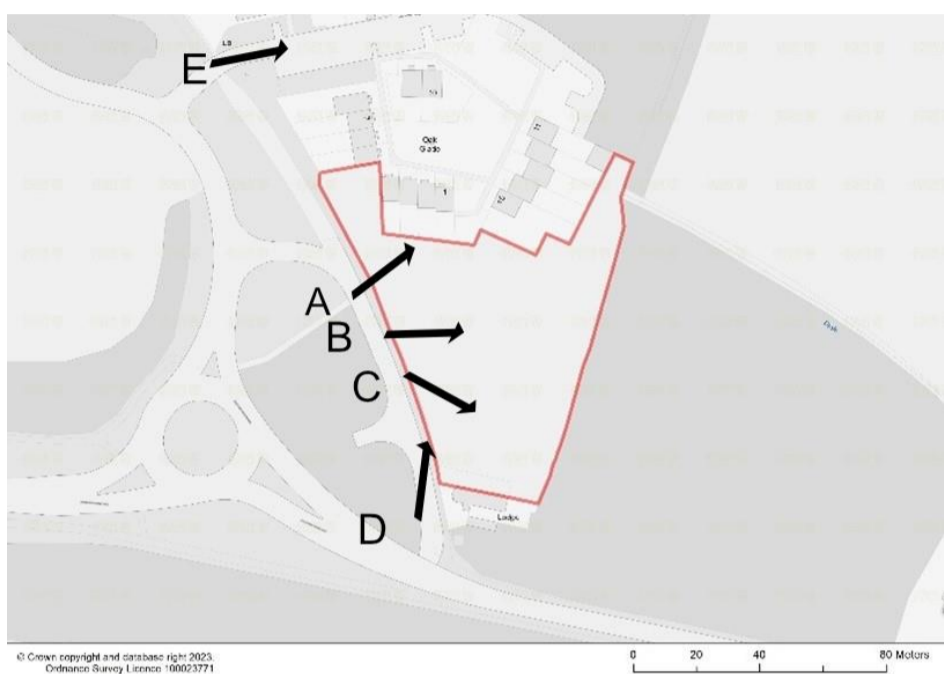
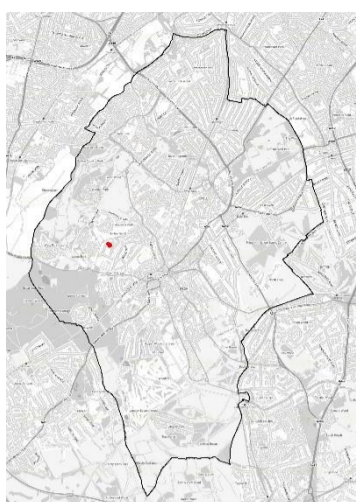
The site is considered to be moderate visual sensitivity

**Conclusion**

Landscape sensitivity low and visual sensitivity is considered to be moderate



**Cuddington Glade (LAA reference HOR001)**



A. View of the site from Cherry Tree Lane, overlooked by residential from Oak Glade



B. View of the site from Cherry Tree Lane. The site has a semi-natural open space



A. View of the site from Cherry Tree Lane.



B. The site is enclosed by timber post fencing and overgrown.



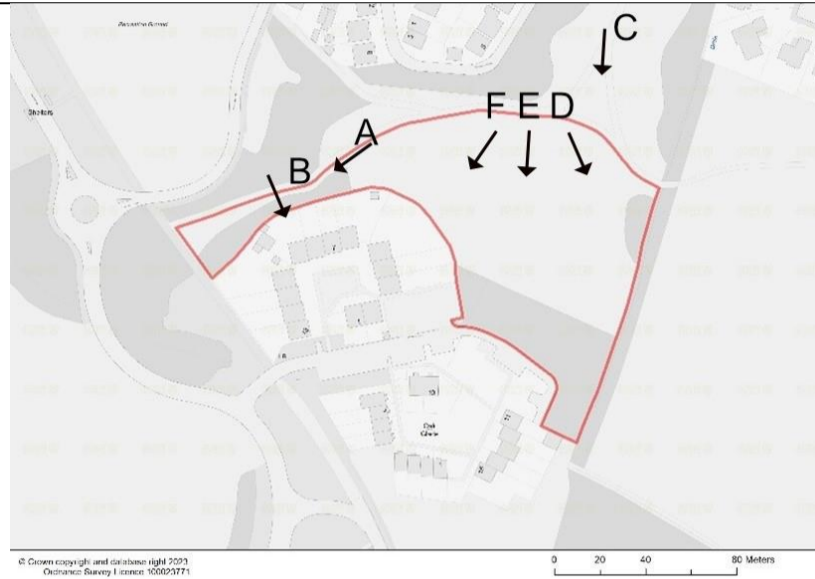
C. Cuddington Glade residential estate to the north of the site

**Current Use/Status.**

Amenity grassland/Open space

<b>Area</b>
0.52 ha
<b>Promoted for</b>
Promoted for future residential development.
<b>Primary Constraints</b>
No
<b>Designations</b>
<ul style="list-style-type: none"> <li>• Tree belt to east (TPOs.)</li> <li>• Adjacent Site of Special Scientific interest (SSSI) and is part of Epsom Common to the south Christ Church Road.</li> </ul>
<b>Landscape character and relationship with the wider area</b>
<p>Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area - LF4, Horton Rolling Clay Farmland is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness. The existing use appears to semi natural amenity grassland, open space to a small number adjacent properties. Site is overgrown and does not appear to be accessible</p> <p>The landscape is open but small and self contained and in terms of exposure, is not particularly sensitive. It's semi natural qualities blends in well with the character of the surrounding area and reflects its vicinity to Epsom Common/SSSI to the south of Christ Church Road. New build development is scattered in a semi rural setting. There is some degree of remoteness/ tranquility being set back busy Christ Church Road but this is a small setback and the busy Christ Church Road does create some disturbance.</p> <p>Landscape sensitivity is considered low</p>
<b>Readily recognisable physical features which are likely to be permanent</b>
<ul style="list-style-type: none"> <li>• The property boundaries to the north of the site (within Cuddington Glade) are well defined</li> <li>• Well vegetated boundary along the east and west.</li> <li>• Property boundary to the south.</li> </ul>
<b>Views</b>
Views are mainly limited to the area or immediate surroundings.
<b>Visual sensitivity</b>
The landscape has a semi natural character. The area is fairly self contained. Landscape predominantly associated with adjacent development at Cuddington Glade. Visual sensitivity
<b>Conclusion</b>
Landscape sensitivity and visual sensitivity is low

Land off Cuddington Glade (LAA reference HOR004)



A. Path along northern edge of the site



B. Glimpses of adjacent residential from the footpath



C. Path approaching the site from the north



D. Semi natural enclosed open space



E. Semi natural enclosed open space



F. Semi natural enclosed open space. Adjacent residential in Cuddington Glade visible.

**Current Use/Status.**

Semi natural open space

**Area**

1.11 ha

**Promoted for**

Promoted for future residential development.

**Primary Constraints**

- No

**Designations**

- Various tree belts and individual trees with TPOs.

**Landscape character and relationship with the wider area**

Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area - LF4, Horton Rolling Clay Farmland is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The existing use is a semi natural amenity grassland, with scattered trees (TPO)

The landscape is self contained and in terms of exposure, is not particularly sensitive. It's semi natural qualities does blend in well with the character of the surrounding area, although not designated for nature conservation but is in the it's vicinity to Epsom Common/SSSI to the south of Christ Church Road. New build development is scattered in a semi rural setting and generally hidden from view from the edges. There is a limited sense of remoteness or due to the vicinity of modern development.

Landscape sensitivity considered to be low

**Readily recognisable physical features which are likely to be permanent**

- Northern boundary, existing footpath south of Ethel Bailey Close running east and south/east
- Tree belt on the eastern boundary down to Cuddington Glade
- Property boundary to West
- To the south, Cuddington Glade (Road) boundary

**Views**

Views in/out are mainly limited to the area or immediate surroundings.

**Visual sensitivity**

The landscape has a semi natural character. The area is self contained so in terms of exposed views is generally low in sensitivity. The semi natural quality of the space connects with the Townscape/built development. Landscape predominantly associated with development

which screens off wider views. Visual sensitivity considered to be low

The site is fairly contained and limited views of the site.

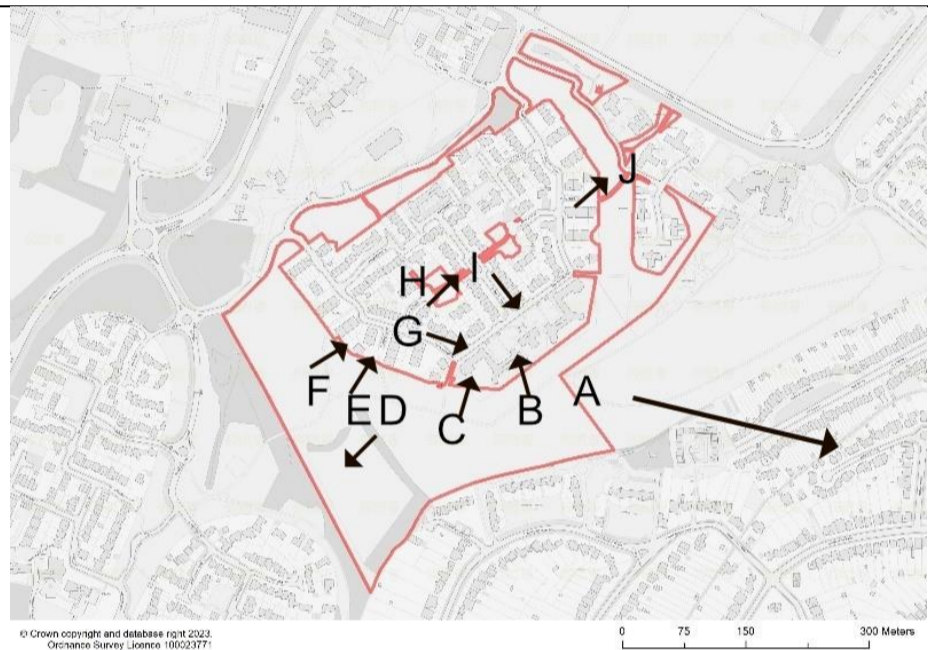
**Conclusion**

Landscape and visual sensitivity low

Horton Hospital, Livingstone Park (within Parcel 25)

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

Horton Hospital, Livingstone Park (LAA reference HOR014)



A. View from the NW of Long Grove Park, long distant views of the Downs



B. Residential buildings south of Livingstone Park adjacent open space and Long Grove Park



C. Residential buildings south of Livingstone Park adjacent open space and Long Grove Park



D. Open space to the southern perimeter of Livingstone Park. Semi-natural green space.



E. Southern perimeter of Livingstone Park. The interface between the residential area and open space is clear.



F. Southern perimeter of Livingstone Park. Views in and out of the residential area are open. The open space inbetween has a semi-natural character. Most of the green space here is designated SNCI



G. Residential area along Horton Crescent west



H. Flatted development near footpath near Cavendish Walk



I. View north of Cavendish Walk



J. View north from Eastman Way

**Current Use/Status.**

Open space/parkland surrounding residential area and other amenities.

**Area**

10.58 ha

**Promoted for**

Various parts of the site being promoted for future development

**Primary Constraints**

No

**Designations**

- The southern portion of the site is designated as a Site of Nature Conservation Interest (SNCI).
- Part of Horton Conservation Area to the north.
- Adjacent Listed buildings to the North
- TPOs groups to the south of the site within SNCI and scattered trees (some TPO) on remaining areas of the site.

**Landscape character and relationship with the wider area**

Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area LF4, forming part of the north-western edge to the settlement of Epsom. LF4, Horton Rolling Clay Farmland is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The characteristic of the area is residential, with some local centre uses, a developed hospital cluster set within the former hospital parkland landscape, which provides an attractive setting to the recently constructed residential neighbourhood and clusters of listed buildings, which are located along the southern edge, adjacent to Long Grove Park.

There are a cluster of buildings located in the north-western corner of the site, including older gate house buildings, detached dwellings and Horton Chapel, are all set within mature trees, with large plots and accesses to Horton Lane, via Haven Way and Abbots Avenue. This forms part of the strong landscape context to the built form of the neighbourhood. The south-western part of the site's open space forms part of the wider network of parks, connecting to Long Grove Park to the south and also contributes to the parkland context of the site.

The character is defined by the development clustered within the former building footprints, arranged in a semi circular pattern, with defined streets and street spaces with a parkland setting around the built-envelope, which give the buildings, especially those listed above, a strong parkland setting with mature specimen trees.

The land is gently sloping in a northerly direction at approximately 40-46m AOD.

The landscape is designed and intensively managed, the relationship between built-form and views to the surrounding landscape is a defining characteristic of the hospital cluster developments.

The landscape of the site is a well-managed. There is a degree of tranquility within the larger extents of open space, with the presence of feature buildings, attractive contemporary design of new residential buildings set within a former hospital landscape, with a strong structure, defined uses in the open spaces and planting function. There are TPOs protecting mature trees throughout the parcel.

Landscape sensitivity considered moderate

**Readily recognisable physical features which are likely to be permanent**

- Haven Way defines the north-western boundary, with hedgerows and hedgerow trees for a significant proportion of its length.
- The south-western boundary is well defined by vegetation part of SNCI and Manor Park housing (former hospital) to the south.
- The south-eastern boundary is defined by the boundary of Long Grove Park which is fenced off
- The western boundary is defined by a strong, well defined, tree line (largely covered by TPO)

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.

**Views**

- Views from Horton Lane and Chantilly along the north and north-western parcel boundaries, with views into the residential area and parkland surrounding the development with gate houses..
- Views from open space within the parcel which forms part of the wider green infrastructure, with footpaths connecting to The Manor development.
- Long distant views towards Epsom Downs from the southern part of the site, north of Long Grove Park

**Visual sensitivity**

The site is of high visual sensitivity due to the historic setting and buildings set within a highly managed parkland setting. Some distant views to Epsom Downs from southern part of the site adjacent to Long Grove Park.

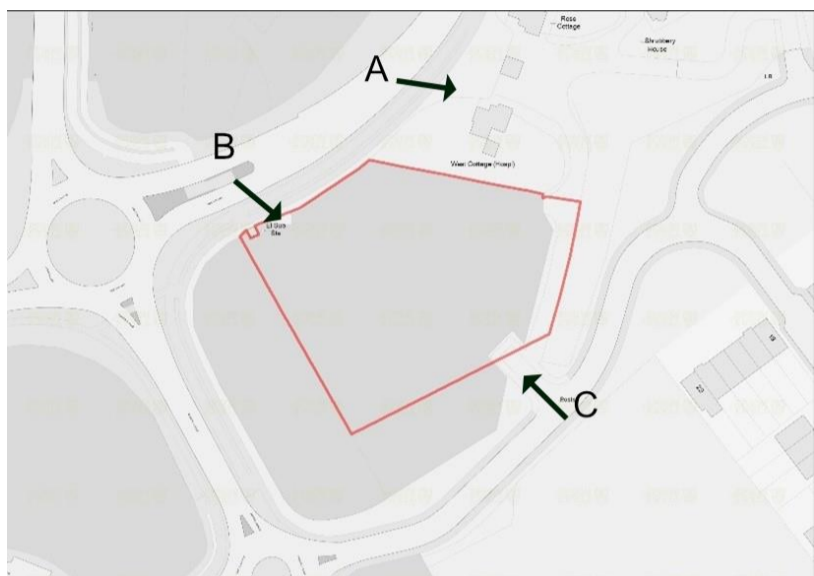
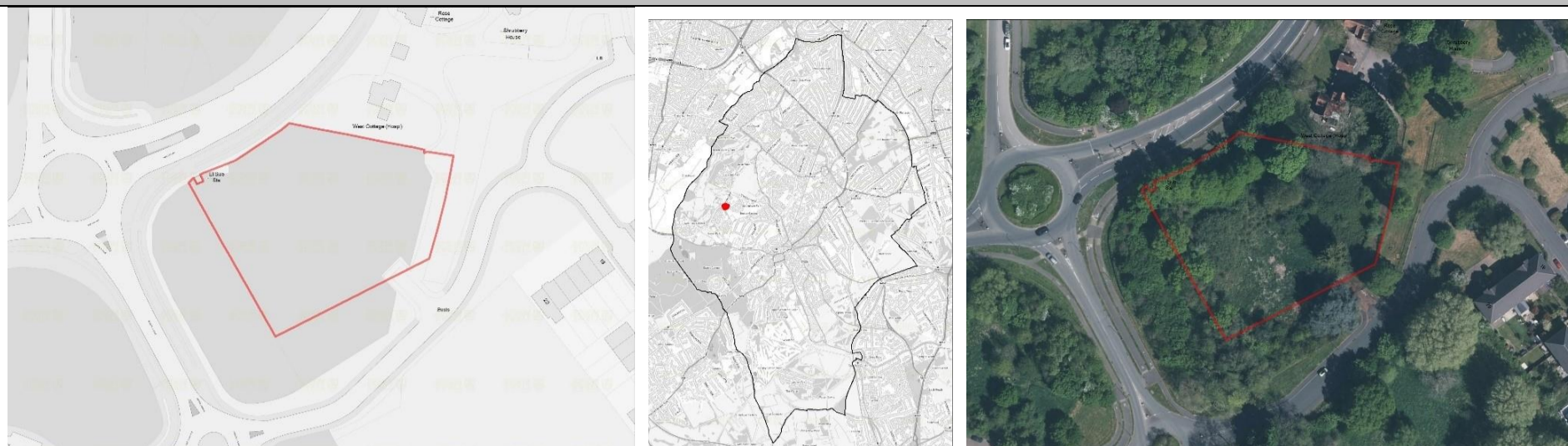


**Conclusion**

The visual sensitivity is high and sensitive to change. There would be limited opportunity for development without impacting the existing considered layout and landscape setting.

The area of Livingstone Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development fall outside the proposed boundary for inseting.

**Land south of West Cottage, Livingstone Park (LAA 2024 reference HOR011)**



A. West Cottage adjacent to the site



B. View of the site from the North, Horton Lane



C. View of the site from the South from Horton Crescent

**Current Use/Status.**

Open land, Former site of a detached house.

**Promoted for**

Various parts of the site being promoted for future development

**Primary Constraints**

No

**Designations**

- Adjacent Site of Nature Conservation Interest (SNCI) to the south
- Within Horton Conservation Area.
- In the vicinity of a Listed building and locally listed building.
- There are numerous TPOs scattered throughout the site

**Landscape character and relationship with the wider area**

Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area LF4, forming part of the north-western edge to the settlement of Epsom. LF4, Horton Rolling Clay Farmland is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The characteristic of the surrounding area is residential, former hospital site set within parkland landscape, which provides an attractive setting to the recently constructed residential neighbourhood and clusters of listed buildings.

There site sits at a prominent corner between Horton Lane and Abbas Avenue. The site of a former house, the site has significant tree coverage (some protected by TPO) and overgrown and boarded up access from Horton Crescent. The site is well screened.

The site sits within a landscape that is intensively managed. There is a degree of tranquility is limited due to it's location at a prominent junction.

**Readily recognisable physical features which are likely to be permanent**

The site has well defined property boundary, however the site boundary submitted for consideration does not follow the property line.

**Views**

The site is heavily screened with vegetated and fenced boundary. Limited views in/out.

**Visual sensitivity**

The site is sensitive due to the historic setting and buildings set within a highly managed parkland setting.

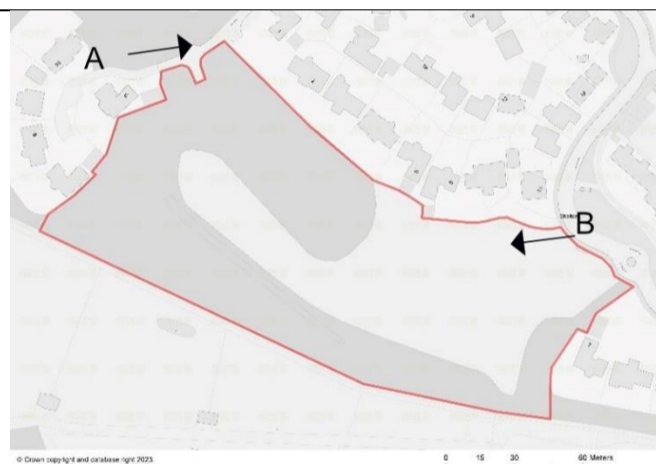
**Conclusion**

It's location at a prominent corner within conservation area and parkland setting means the visual sensitivity is high. The site is currently heavily vegetated and views in and out are limited. It forms part of a green buffer between the residential area and main road, Horton Lane. The site is also high landscape and visual sensitivity

**Clarendon Park (within Parcel 27)**

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

**Clarendon Park (LAA 2024 reference HOR012)**



A. View from the NW, South View



B. View from NE

**Current Use/Status.**

Open space.

**Area**

1.96 ha

**Promoted for**

The site being promoted for future development

**Primary Constraints**

- No

**Designations**

- Site of Nature Conservation Interest (Horton Country Park) running along the south of the parcel following tree belt
- TPOs grouped to the south and scattered throughout the parcel.
- Critical drainage/surface water drainage issues
- Adjacent to Long Grove Conservation Area

**Landscape character and relationship with the wider area**

Located within the National Character Area 114, Thames Basin Lowlands and adjacent to Surrey County Landscape Character Area LF4, forming part of the north-western edge to the settlement of Epsom. LF4, Horton Rolling Clay Farmland is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The site is open space associated with residential development to the north. A developed hospital cluster set within the former hospital parkland landscape. 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.

The landscape is designed and intensively managed. The site is adjacent to the conservation area. There is little sense of remoteness and a degree of tranquility.

The landscape sensitivity is considered low.

**Readily recognisable physical features which are likely to be permanent**

- BW73 on the southern boundary
- Property boundaries to the west (South View)
- Well defined tree belt to the south
- Property boundary to the east (Mckenzie Way)

The area of Clarendon Park has been assessed for potential inseting in Section 2 and this site does not fall within the proposed boundary for inseting as it has an open character here and therefore considered to be retained

**Views**

Open space adjacent residential, views in and out of the site are limited to the residential areas of South View sand McKenzie way.

**Visual sensitivity**

Whilst there are limited views in and out.

The site is of moderate sensitivity due to the historic setting near conservation area set within a highly managed parkland setting.

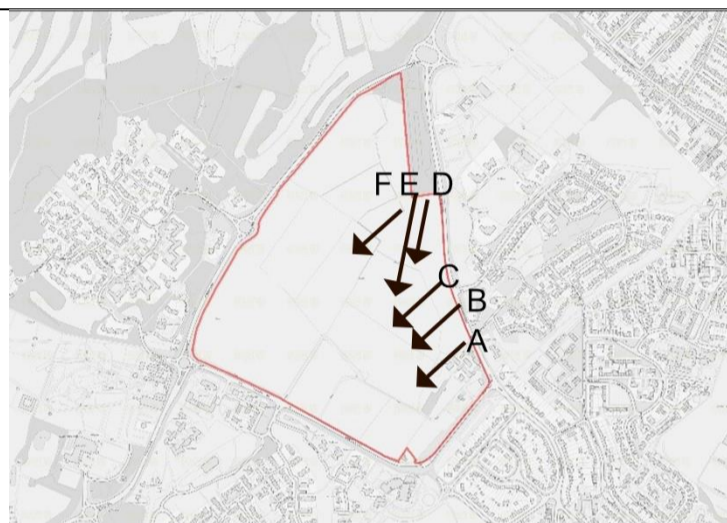
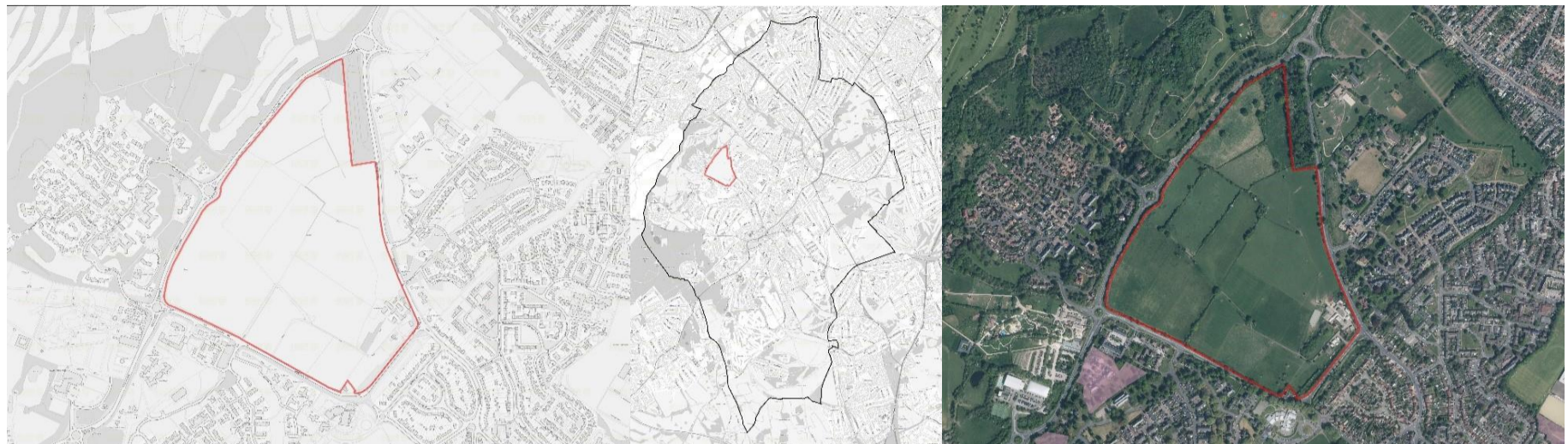
**Conclusion**

The landscape sensitivity is limited and visual sensitivity is moderate. There are also a number of constraints identified within the parcel that would be sensitive to change.

Land at Horton Lane (within Parcel 28)

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

Land at Horton Lane (LAA reference HOR009)



A. View of the site from Hook Road, St Ebba's entrance.



B. View of the site from Hook Road. The hedge/tree line is incomplete and allows for views in/out of the site here



C. View of the site from Hook Road. There is no pavement on the side of the road of the site.



D. View of the site from edge adjacent to the cemetery



E. View of the site from edge adjacent to the cemetery. Fields used by horses to graze



F. View of the site from edge adjacent to the cemetery. Horses grazing on the field. Extensive area, appears flat, distant views to the other side of the site.

**Current Use/Status.**

Horton Farm Stables/Riding school  
Hay meadow grassland

**Area**

37.9 ha

**Promoted for**

The site being promoted for future development.

**Primary Constraints**

None

**Designations**

- Adjacent Local Nature Reserve and SNC to the north-west at Horton Country Park and Horton Golf Club.
- There are Conservation Areas outside of the boundary but in the vicinity of three of its boundary edges associated with the hospital cluster.
- There is a listed building within the Horton Farm Stables group of buildings (the Grade II Horton Farmhouse), other listed buildings in the vicinity
- The woodland located to the northern-most part of the parcel is protected by a TPO.

**Landscape character and relationship with the wider area**

The site is located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area LF4. LF4, Horton Rolling Clay Farmland is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

Land uses are predominantly agriculture set within a series of variable sized fields. The topography is gently sloping elevation is between 35 and 45m AOD.

The site has strong vegetated boundaries or edges and has a gently undulating landform. The parcel provides an open gap between the hospital development clusters located to the north, south-west and north-east of the parcel and acts as an island between the built up areas.

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. There is limited sense of remoteness and tranquility, but the nearby Horton Country Park is relatively peaceful.

The vegetated boundaries of the site are strongly defined with native field hedgerows and tree belts along the main roads surrounding the site. To the north of the site, outside of the boundary is there is a woodland block/cemetery (with TPOs), which is reflective of those found in the wider character area.

The landscape sensitivity is considered low.

**Readily recognisable physical features which are likely to be permanent**

- Horton Lane
- Hook Road (B284)
- Chantilly Way

The boundary of the site tend to be well-defined agricultural hedgerows. The site is entirely enclosed and form a series of well-defined agricultural fields. The northern point of the site, adjacent to the Hook Road Arena roundabout and access, is well defined by a woodland block of approximately 70 metres in depth.

**Views**

Views into this land are mainly through breakages of various lengths in the hedgerows along Horton Lane, the B284, Hook Road and Chantilly Way.

**Visual sensitivity**

Whilst the site reflects the Rolling Clay Farmland character, overall the visual sensitivity of this site is Low to Medium as it is fairly self contained and, there are some short distance views from publicly accessible viewpoints but limited medium/longer distance views beyond the site. There is no access to the land and no Public Rights of Way through the site and the surrounding boundary is heavily vegetated.

Large site in the vicinity of conservation areas at 3 of its 4 sides. Site forms the backdrop to the former hospital clusters

The higher score from GBS Stage 1 is noted as the site is a significant size and does provide a separation between the hospital clusters, effectively a green island surrounded by the redeveloped areas of the hospital clusters

It is of low tranquillity in the context of the busy roads that surround the site entirely and views of modern development from the redeveloped hospital clusters.

Visual sensitivity considered to be moderate.

**Conclusion**

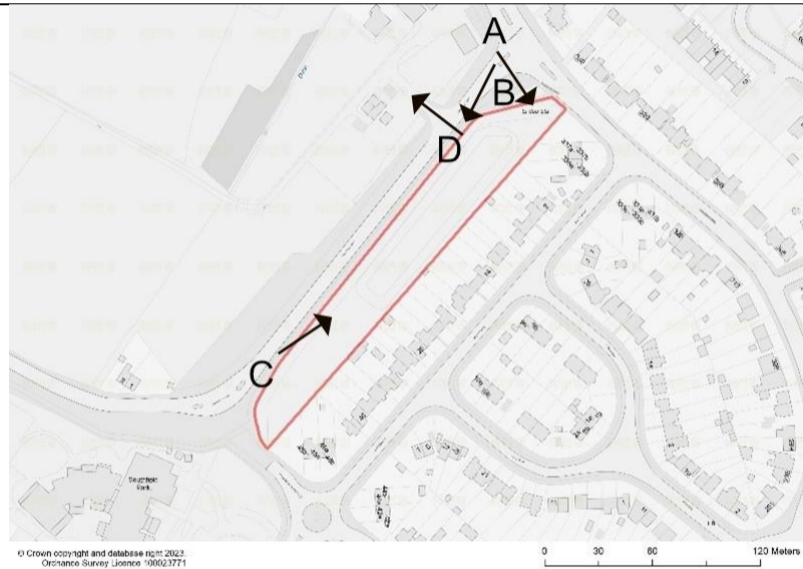
The landscape and visual sensitivity are low to moderate. The site is a significant size and fairly flat and self contained and the parcel has well defined robust and durable boundaries on all sides.



Land at Chantilly Way, Epsom within Parcel 29

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

Land at Chantilly Way, Epsom (LAA reference HOR010)



A. View from the north corner, the intersection of Hook Road and Chantilly Way. Vegetated edge



B. View looking SW down the site along Chantilly Way. The site is visible from the road. The land slopes down in the centre creating a basin. The site abuts the rear of boundaries at Brettgrave.



C. View looking NE



D. View at the northern corner, looking across to Horton Farm (HOR009)



The landform is uneven



The site has a scrub like, unmanaged appearance

**Current Use/Status.**

Land use for informal grazing of horses.

**Area**

0.7 ha

**Promoted for**

The site being promoted for future residential development.

**Primary Constraints**

None

**Designations**

There is a single TPO located within a residential plot adjacent (along Brettgrave).

**Landscape character and relationship with the wider area**

The site is located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area LF4, forming an edge to the settlement of Epsom and nearby West Ewell. LF4, Horton Rolling Clay Farmland is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The characteristic of this site is an undeveloped paddock, but it is heavily influenced by Chantilly Way and the settlement edge of Epsom to the south east. Residential properties along Brettgrave lies parallel and overlooks the site.

The site is at 40 to 45m AOD and forms a basin-like depression which may have a flood-related function however this needs further investigation.

This parcel is severed from the wider landscape rural landscape by Chantilly Way and has a stronger relationship with the urban landscape than the wider landscape across the road.

The landscape condition is unmanaged and scrubby in appearance

**Readily recognisable physical features which are likely to be permanent**

Rear of property boundaries.

Chantilly Way

Clear robust and durable boundaries that would round off the settlement boundary neatly

**Views**

The site is visible from the Chantilly Way and from residential properties on Brettgrave.

**Visual sensitivity**

The landscape is of low sensitivity. The site is substantially affected by the adjacent residential areas and associated busy road of Chantilly Way and the vegetation lacks structure. There is no sense of remoteness or tranquillity in the context of Chantilly Way to the immediate west of the site.

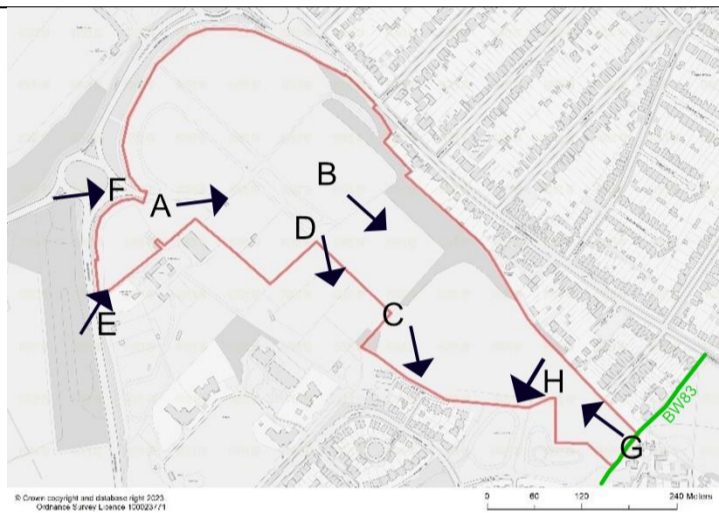
**Conclusion**

The landscape sensitivity is low and considered would be limited impact on openness if released. The parcel performs little purpose in Green Belt terms, scoring low in the GBS Stage One.

Hook Road Arena within Parcel 31

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

Hook Road Arena (LAA reference COU026)



A. View of the site looking south from the NW entrance



B. View from the centre of the site looking NE. The rooftops of properties along Chessington Road are visible. Chessington Road is heavily trafficked and road noise is noticeable here.



C. View from the centre of the site looking SW, Views of residential development former hospital cluster site, St Ebba's



D. Whilst most of the adjacent Riding School is well screened, there are brief glimpses of the site from here.



E. Epsom RDA is a charity offering horse riding opportunities for disabled people. The entrance to the site is via Horton Lane



F. NW entrance to the site from roundabout on Horton Lane



G. View north towards the site from Bridleway 83



H. Access between Hook Road Arena open space and the St Ebba's residential area

**Current Use/Status.**

- Playing fields
- Open Space, Events space- Car boot sales/fireworks

#### Area

13.74 ha

#### Promoted for

The site being promoted for future development.

#### Primary Constraints

None

#### Designations

Group TPOs approximately mid point, sub-dividing the site

#### Landscape character and relationship with the wider area

Located within the National Character Area 114, Thames Basin Lowlands and Surrey County Landscape Character Area LF4. Horton Rolling Clay Farmland is described as gently rolling landscape, paddocks, farmland and scattered woodland surrounded by built development which encloses some of the landscape limiting the sense of tranquility and remoteness.

The site sits at the edge of the built up limits and between residential areas on two sides along Chessington Road and former hospital cluster (St Ebba's) now residential estate. It is therefore greatly influenced and visible to and 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.

Whilst the site provides a narrow wedge between the residential areas along Chessington Road and St Ebbas, the scale and position is not considered significant in the context of the wider landscape and Green Belt. The site is fragmented and substantially affected by the adjacent residential areas and associated busy road network of Hook Road and Chessington Road. Chessington Road in particular is very busy and the noise of the road is noticeable from the site, and as such limiting the sense of remoteness or tranquility.

Landscape sensitivity is low.

#### Readily recognisable physical features which are likely to be permanent

BW83 – Bridleway to the south west of the parcel.

Well defined field boundaries, tree belts along roads including Chessington Road (B2200), Horton Lane (B284) and Hook Road.

Footpath in Hook Road Arena.

Property boundaries including the Riding school and adjacent St Ebba's development is fenced off.

#### Views

- Views into the site from Bridleway
- Limited views from Chessington Road, (B2200) or Horton Lane (B284), site is well screened by vegetation
- Residential properties from adjoining areas
- St Ebba's Farm, an employment area, now used for horse stabling.

#### Visual sensitivity

The landscape and visual sensitivity is low, with similar landscape within the wider borough character area, The site is flat and well screened. It is heavily influenced by adjoining residential development. It functions as a gap between the areas. There are views of the site from the bridleway but the site is well screened from the roads. The southern part is possibly lower sensitivity due to it's proximity to the wider built up settlement of the main town, becoming more undeveloped moving north/west.

The relationship of this parcel to the surrounding area is important and whilst the parcel does provide a gap between the settlement edges of Epsom and Ewell West and the wider series of parcels, it's function is considered more effective on a local level rather than at a strategic level.

Visual sensitivity is low

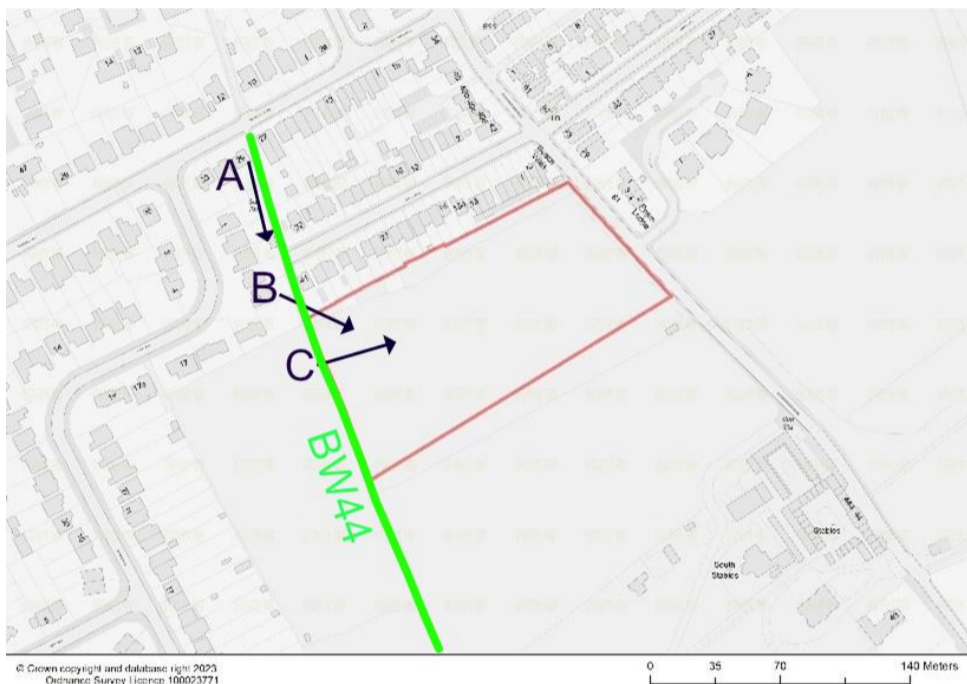
#### Conclusion

The Landscape and visual sensitivity is low. The parcel well defined robust and durable boundaries on its north eastern and western boundaries formed by Chessington Road and Hook Road respectively which are also considered capable of forming a new robust Green Belt boundary.

Land West of Burgh Heath Road (within Parcel 32)

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

Land West of Burgh Heath Road (LAA reference COL017)



View south from Bridleway 44



View south from Bridleway 44



View south from Bridleway 44

**Current Use/Status.**

Agricultural land

**Area**

1.52 ha
<b>Promoted for</b>
The site being promoted for future development. An initial masterplan has been submitted
<b>Primary Constraints</b>
None
<b>Designations</b>
Archaeological site/significance
TPOs
<b>Landscape character and relationship with the wider landscape</b>
<p>Located within the National Character Area 119 North Downs and Surrey County Landscape Character Area CD1, Ashted and Woodcote Parks Chalk Down with Woodland. The key characteristics of the landscape include proximity to golf courses and Epsom Downs, with land generally rising south towards The Downs. The area includes large paddocks, gallops, stables and sports fields set within an undulating landform. The site itself is a large agricultural field.</p> <p>The aspect of the site is north-west facing and there is a significant change in level from south to north, between 112 and 85m AOD. There are urban features within these small-scale fields, as they adjoin properties on Burgh Heath Road, Beech Road and Beech Way.</p> <p>The eastern and western boundary are well vegetated, screening the site from view, however the site appears elevated from the road and alley, due to the elevation, there is inter-visibility with the surrounding areas.</p> <p>The landscape sensitivity is considered high.</p>
<b>Readily recognisable physical features which are likely to be permanent</b>
<ul style="list-style-type: none"> <li>• Burgh Heath Road to the east which is well defined by hedgerow;</li> <li>• Rifle Butts Alley (Bridleway 44), a PROW which connects Epsom Golf course to the residential street of Beech Road</li> <li>• The northern boundary of this parcel is defined by residential boundaries and line of TPO Trees.</li> <li>• The southern boundary of the site is not defined, it lies north of the field edge which is delineated by a fence</li> </ul>
<b>Views</b>
<ul style="list-style-type: none"> <li>• Residential properties along Burgh Heath Road, Downs Road, Downs Way, Aston Way, Beech Road</li> <li>• Views from PROW Rifle Butts Alley which is located to the west of the site.</li> <li>• Views from several elevated and popular panoramic viewing points at Grand Stand Road, which looks towards London</li> </ul>
<b>Visual sensitivity</b>
<p>The site is highly sensitive to change due to its location and transitional landscape character between the edge of Epsom with the wider landscape of Epsom Downs. The elevated location and undulating landform allows for views on lower ground and distant views to and from Epsom Downs to the immediate south of the site.</p> <p>Visual sensitivity is considered high</p>
<b>Conclusion</b>
The visual sensitivity is high and landscape sensitivity is high. In addition the parcel forms part of the gap between the urban edge of Epsom to the north and Great Burgh to the south east.

**Land east of Burgh Heath Road (within parcel 33 and 34)**

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P33	Land to the east of Burgh Heath Road south of Beech Way	3	2	2	7
P34	Land north of Epsom Golf Course east of Burgh Heath Road	2	2	2	6

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



**Current Use/Status.**

Agricultural.  
Stabling, Paddocks.

**Area**

8.82 ha

**Promoted for**

The site being promoted for future development.

**Primary Constraints**

None

**Designations**

There are TPOs dotted around the site.  
Adjacent SNCI

**Landscape character and relationship with the wider area**

Located within the National Character Area 119 North Downs and Surrey County Landscape Character Area CD1, Ashted and Woodcote Parks Chalk Down with Woodland. The key characteristics of the landscape include proximity to golf courses and Epsom Downs, with land generally rising south towards the Downs. The area includes large paddocks, gallops, stables and sports fields set within an undulating landform. The site itself is a number of various sized agricultural fields/paddocks.

This series of fields form part of the small-scale transition between the southern Epsom settlement edge and the larger-scale uses on the slopes of Epsom Downs and the golf course use to the south of the land parcel. This site is also adjoined by land to the south, with large infill plots development, which is accessed via Burgh Heath Road, a series of larger plots with substantial dwellings.

New development is located to the north of the land parcel, extending the southern settlement edge of Epsom.

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. The aspect of the site is north facing and there is a significant rise in levels from north to south, between 90 and 100m AOD. The site form part of these views in the context of the Epsom settlement edge. Additionally, due to the elevation, there is inter-visibility with the surrounding areas, for example, views towards the land parcel from roads footpaths to the south, running along the northern edge of Epsom Downs Golf Course.

Landscape sensitivity considered to be high.

**Readily recognisable physical features which are likely to be permanent**

- The western boundary is Burgh Heath Road, consists of mature, well-maintained hedgerow which runs along it, this does have a break which has been made to create a site works access.
- The north boundary is defined by a mix of property boundaries, hedgerows and trees, potentially the former agricultural hedgerows of the former edge
- The eastern boundary is a former agricultural hedgerow boundary, with some gaps in the northern section of the hedgerow.
- The southern boundary is a well-defined agricultural hedgerow.

**Views**

- Distant view from elevated of the Downs
- Views from undesignated footpaths to the south, running along the northern edge of Epsom Downs Golf Course.

**Visual sensitivity**

High sensitivity due to its location and transitional landscape qualities as part of the southern settlement edge of Epsom with the wider larger scale landscape of Epsom Downs to the south-west.

The site has extensive visibility and is close to the elevated Epsom Downs landscape.

**Conclusion**

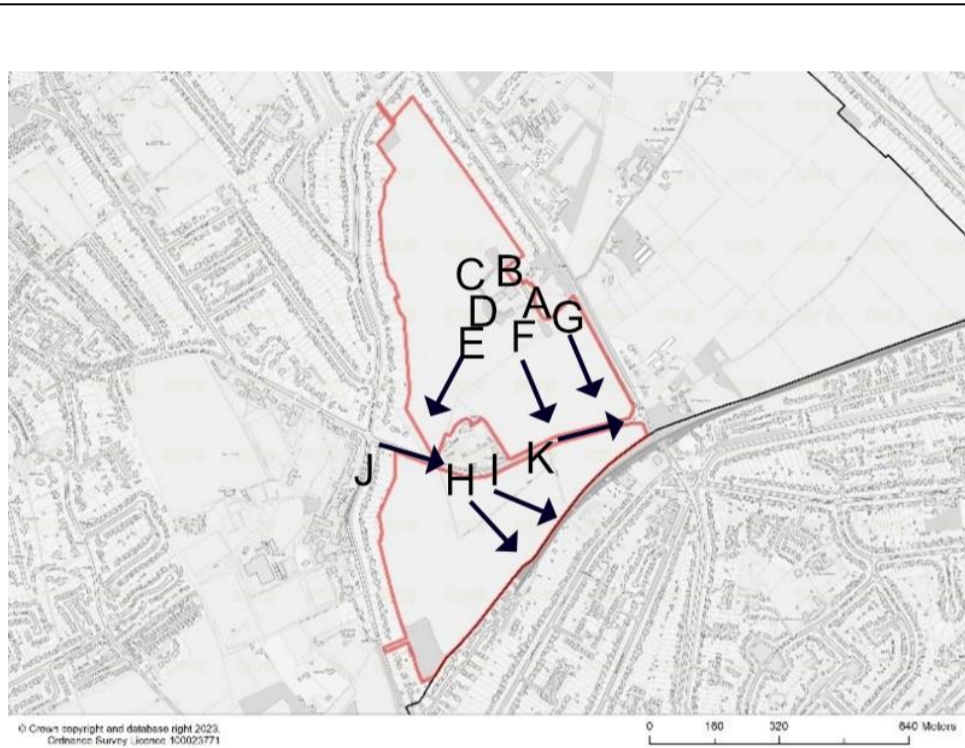
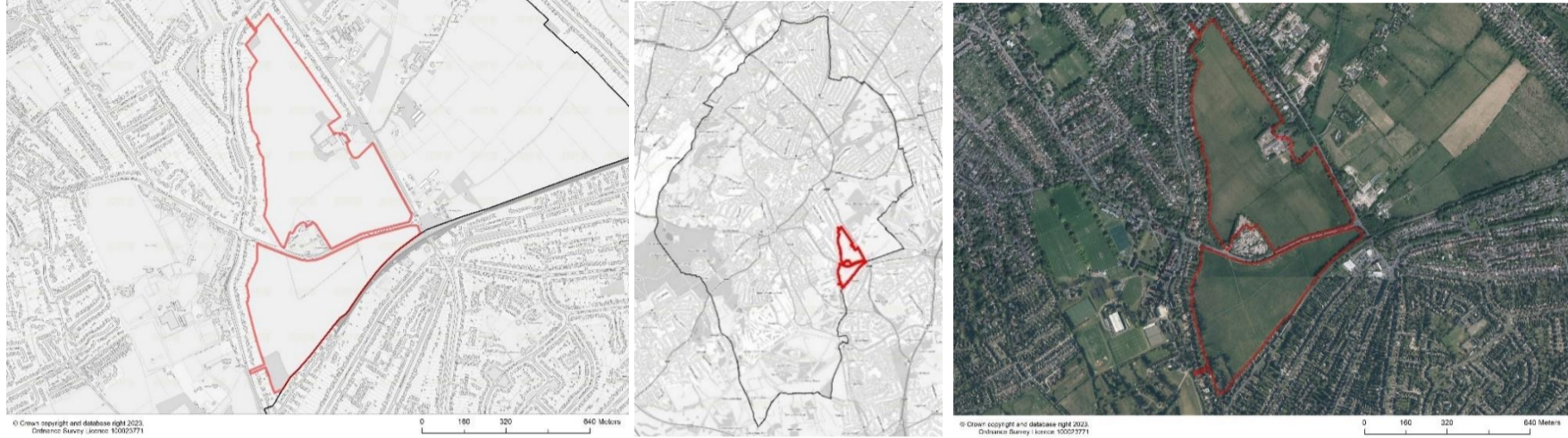


Landscape and visual sensitivity are high. In addition the parcel forms part of the gap between the urban edge of Epsom to the north and Great Burgh to the south east which if released would compromise the integrity of the Green Belt in this location.

**Downs Farm (within Parcel 35 and 37)**

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P35	Land to the east of Longdown Lane South, south of College Road	1	3	2	6
P37	Land north of College Road west of Reigate Road	1	3	2	6

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



A. View from the centre of the site, access drive to the onsite business



B. Existing business operating from the centre of the site



C. Existing business on site



D. Land south of the buildings, embanked open space



E. View west from embanked area at the centre of the site



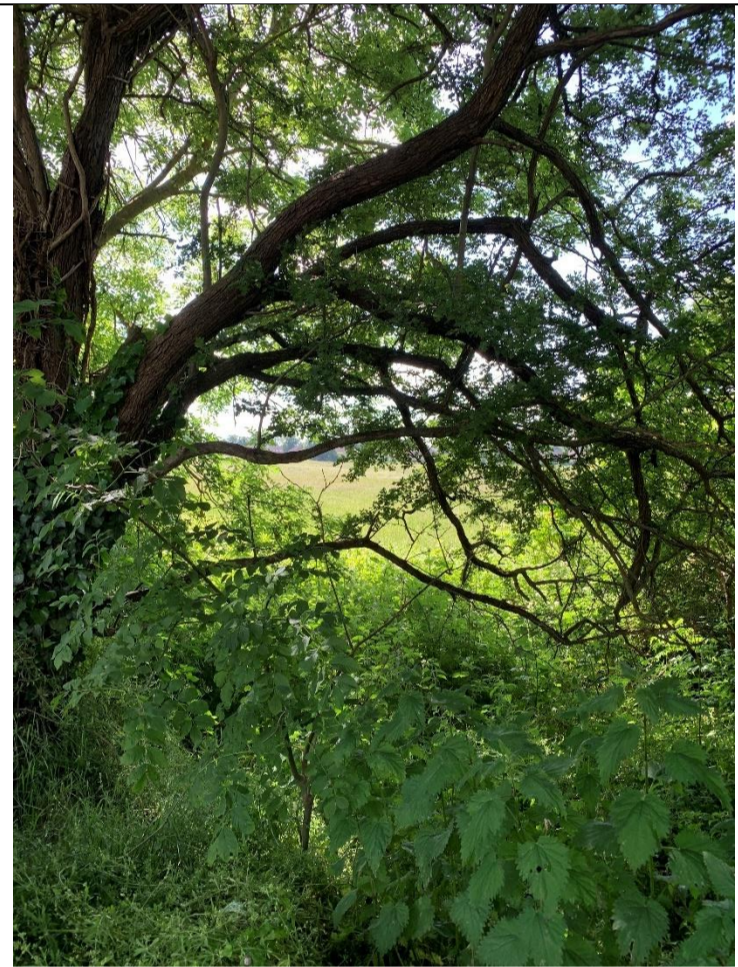
F. View south from embanked area at the centre of the site



G. View south east from the embanked area at the centre of the site



H. View south of the southern parcel from College Road (A2022), gaps in the vegetated boundary



I. View south of the southern parcel from College Road (A2022), gaps in the vegetated boundary



J. View north east towards the northern parcel. The opening is for the Skip Hire business along College Road



K. View east along College Road, A2022

**Current Use/Status.**

- Grassland
- Light Industrial use within former Chalk pit (College Road);
- Small business units at 'The Downs Farm' (Reigate Road); and
- Adjacent to residential on Reigate Road and Longdown Lane

**Area**

27.97ha NON016 (north)  
17.92 ha NON042 (south)

**Promoted for**

The site being promoted for future development. Initial concept plan suggest built development on the northern parcel and with no development on the southern parcel except for improved accessibility and footpaths. Therefore, only the northern parcel is considered here.

**Primary Constraints**

None

**Designations**

- Listed Buildings adjacent (visible with the nearby Epsom College campus).
- Adjacent Higher Green/Longdown Lane Conservation Area is located to the north-west of Parcel 37.
- There are TPOs within the western site boundary and along the eastern boundary adjoining the A240 Reigate Road..

**Landscape character and relationship with the wider area**

Located within the National Character Area 119, North Downs and Surrey County Landscape Character Area CF4, North Looe Open Chalk Farmland. The key characteristics of this landscape is north facing slopes and undulating landform rising southward, farmland, arable fields and sports fields, hedges of varying intactness, limited public rights of way, distant views of the settlement edge. Busy roads and railway line severance.

The site is contained by existing residential development and possesses north facing slopes. Parcel 37 forms part of the gap between the Epsom settlement boundary and Epsom Downs residential areas of Nork, adjacent to the Epsom Downs Station, together with Parcel 37. It has an undulating landform, but rising towards the south direction from 80m to 95m AOD. The site comprises paddocks, pasture, farmland land parcel with little or no subdivision. The land use on the site itself is comprised of employment uses on the site and within a former chalk pit.

The western boundary and most of the eastern boundary is residential, with mixed rear property boundaries along Longdown Lane North, and a strongly vegetated boundary. Hedges along field boundaries vary in intactness. Views are possible across the site to the nearest settlement edges.

The condition of the landscape is mixed, with the employment site boundaries for the former Chalk Pit and Downs Farm detracting from the wider landscape character. Tranquillity, remoteness and scenic beauty are limited due to urban influences.

The site is adjacent to conservations areas to the north.

Landscape sensitivity is low.

**Readily recognisable physical features which are likely to be permanent**

- The southern boundary is well-defined along College Road, with mature hedgerow vegetation on the site boundary
- The western and north-eastern boundaries are bordered by residential properties that have mature vegetation (including some TPOs)
- The southern section of Reigate Road has some mature trees lining the route and bordering Parcel 37.

**Views**

The northern parcel is well-contained, glimpse of the site to the north via Skip development  
Views of the southern parcel from College Road.  
Views of Epsom College to the south visible from the northern parcel

**Visual sensitivity**

This parcel has a medium sensitivity. It provides a gap between existing development. The site contributes to a series of pockets of land, which together form a gap between the Boroughs of Epsom and Ewell and Reigate and Banstead.

The site is also surrounded by development and therefore has already been affected by urbanising features.

**Conclusion**

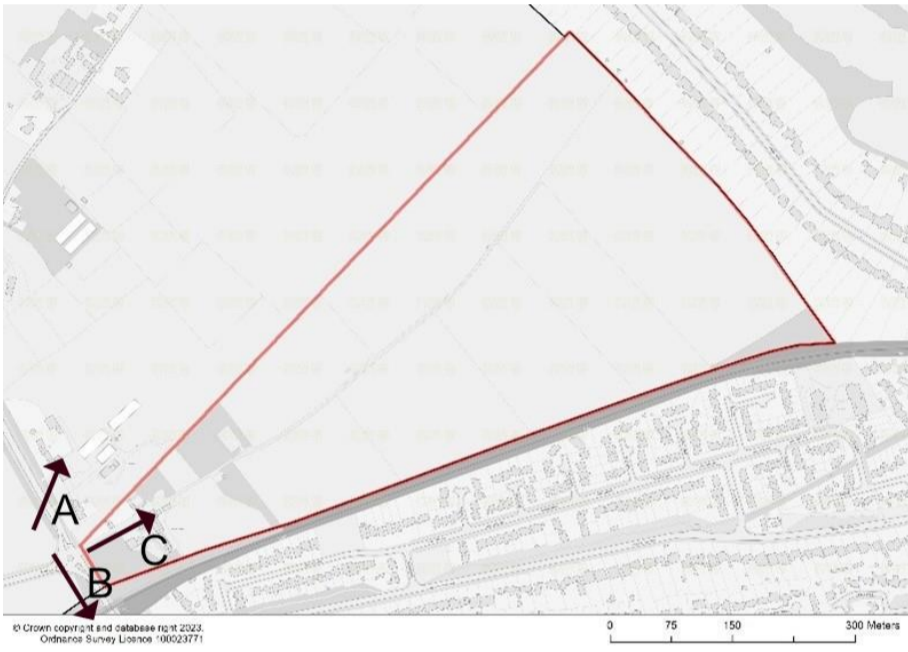
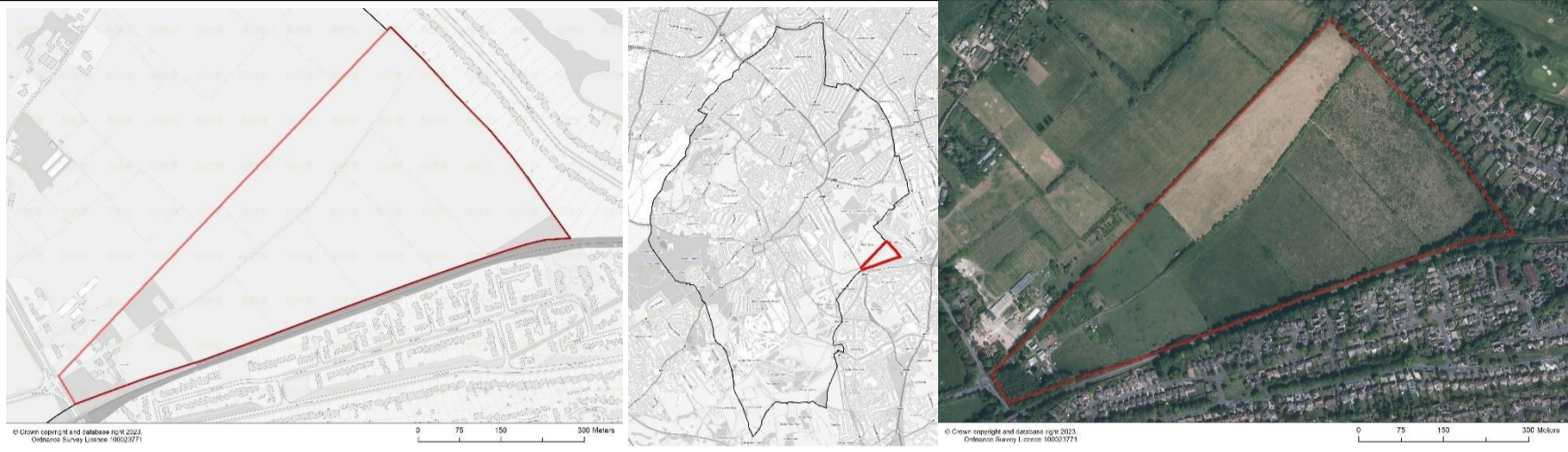
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The site is also surrounded by development and therefore has already been affected by urbanising features.

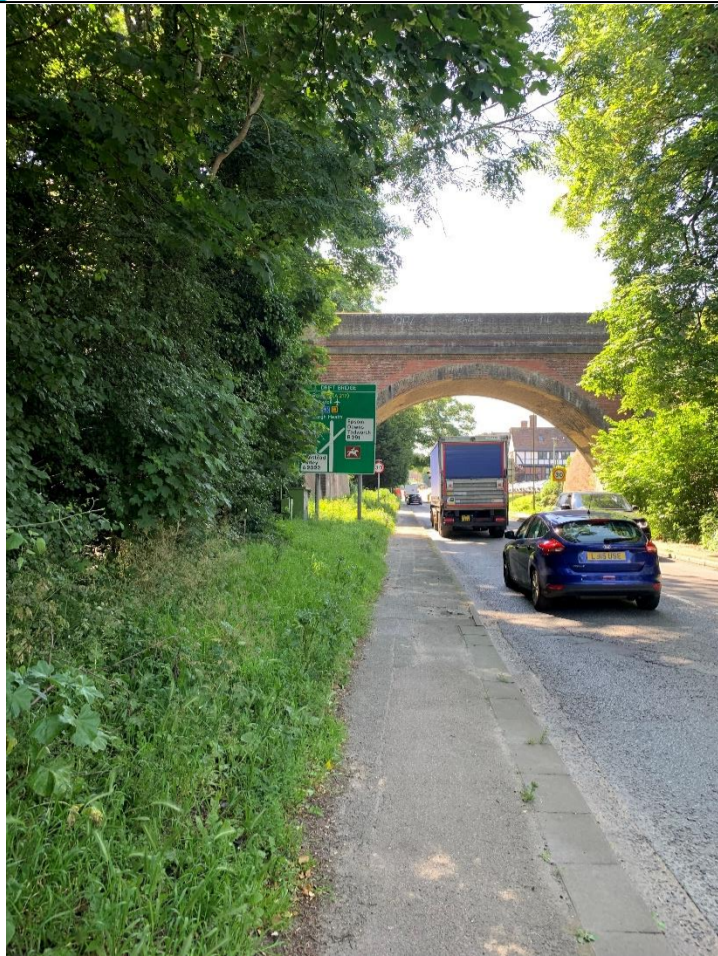
**Drift Bridge Farm (Within Parcel 38)**

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P38	Land to the east of Reigate Road north of railway line at North Looe	3	2	3	8

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



A. Garden Centre located north of the site



B. View south of Reigate Road (A240), view of Drift Bridge



C. View of site from the entrance of the site

**Current Use/Status.**

Agricultural land, pasture and buildings, advised to be vacant

**Area**

24.02 ha

**Promoted for**

The site being promoted for future development.

**Primary Constraints**

None

**Designations**

There are TPOs which coincide with the substantial tree belts eastern boundary.

**Landscape Character and relationship with the wider landscape**

Located within the National Character Area 119 North Downs and Surrey County Landscape Character Area CF4 Open Chalk Farmland is characterized by chalk hills, north facing slopes and undulating landform rising southward, farmland, arable fields and sports fields, hedges of varying intactness, limited public rights of way, distant views of the settlement edge. Busy roads and railway line severance.

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 entrance of the site. Access to the site is restricted to the west from Reigate Road (the A240), which is heavily vegetated with restricted views.

Tranquillity, remoteness and scenic beauty are limited due to urban influences, located next to a busy road, railway line and to the south and east adjacent residential properties and the settlement edge of Nork.

Landscape sensitivity is low, however note the moderate/high scores at Stage 1

**Readily recognisable physical features which are likely to be permanent**

- Reigate Road (A240) to the west
- Railway line along the southern boundary
- Field line delineated by vegetation/hedge/tree line
- Rear of property boundaries of Higher Drive

**Views**

Site is self contained, limited views in/out

**Visual sensitivity**

The site is fairly self contained. The parcel forms part of the gap between urban areas to the north and south.

The railway line that currently separates the site from the settlement of Nork (in Reigate and Banstead) is a strong and clear defensible boundary. If the site were released for development, that boundary would be compromised leaving a less well defined boundary. In addition redevelopment would reduce the gap here.

**Conclusion**

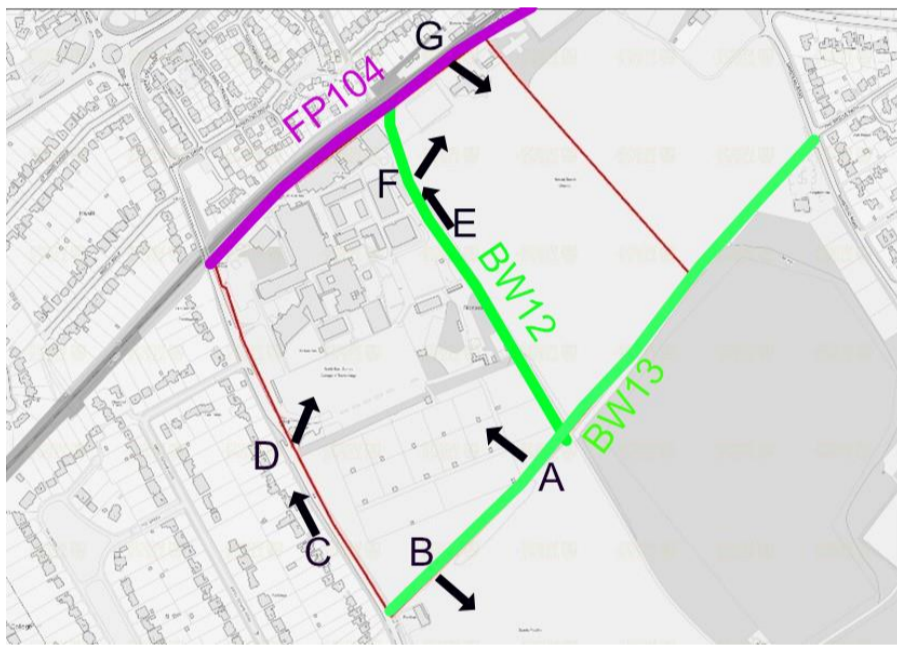
The parcel forms part of the gap between urban areas to the north and south. The railway line that currently separates the site from the settlement of Nork (in Reigate and Banstead) is a strong and clear defensible boundary. If the site were released for development, that boundary would be compromised leaving a less well defined boundary, as well as reducing the gap here compromising the integrity of the Green Belt in this location.



**NESCOT (within Parcel 42 and 43)**

Parcel ID	Site Description	Purpose score 1	Purpose score 2	Purpose score 3	Overall Score
P42	Land at and associated with NESCOT College	1	3	1	5
P43	Land to the east of NESCOT College	3	3	2	8

**NESCOT (LAA reference NON041)**



A. View of the southern field used for animal husbandry teaching (part of college) from the bridleway (BW13)



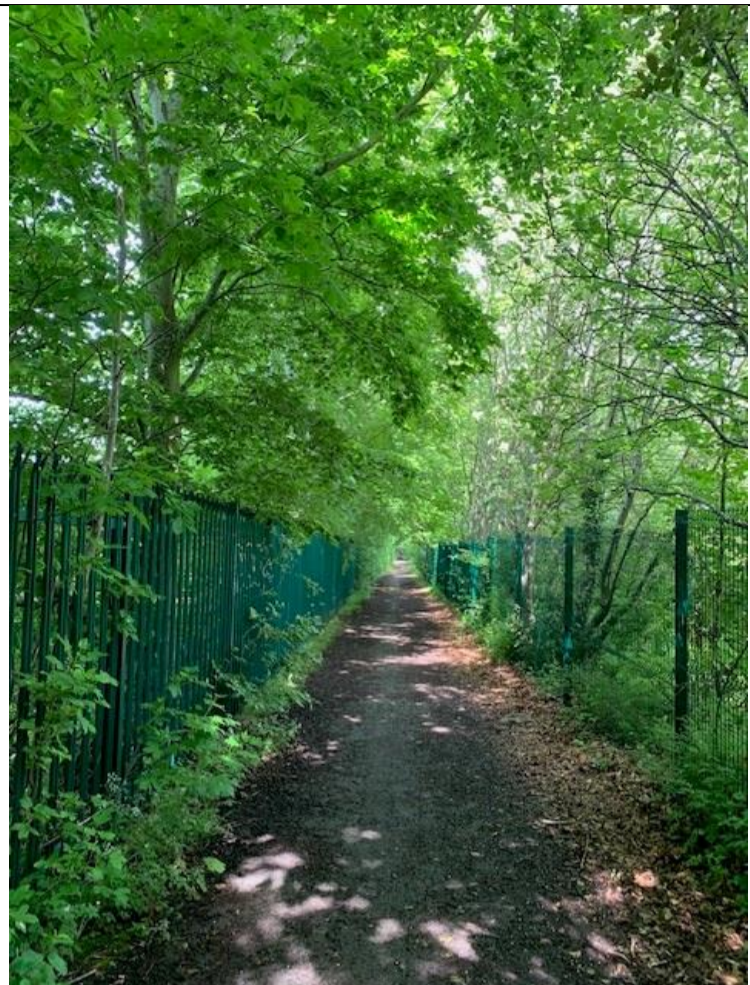
B. View of the southern field outside of the site, the adjoining sports ground (Glyn School Sports Pavillion) to the south of BW13



C. View north from Reigate Road, the western edge of the site



D. View of the NEScot campus at Reigate Road



E. View north along bridleway (BW12), which cuts between the east and west part of the site



F. View of the western parcel from bridleway (BW12)



G. View of derelict buildings from footpath along the northern boundary (FP104)

**Current Use/Status.**

- Educational establishment
- Nescot sports ground – football/rugby pitches with associated parking and pavilions/changing rooms.

**Area**

23.08 ha

**Promoted for**

The site to the west is being promoted for leisure and educational use linked with NEScot

**Primary Constraints**

None

**Designations**

Adjacent Priest Hill Nature Reserve (SNCI) to the south

**Landscape character and relationship with the wider area**

Located within the National Character Area 114, Thames Basin Heaths and Surrey County Landscape Character Area CF4, North Looe Open Chalk Farmland. The key characteristics of this landscape is north facing slopes and undulating landform rising southward, farmland, arable fields and sports fields, hedges of varying intactness, limited public rights of way, distant views of the settlement edge. Busy roads and railway line severance.

The site is a further education college and adjoining open space on the edge of 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 site borders the railway line with public rights of way to the, north (parallel to the railway line), Reigate Road (A240) and to the south of the site is Glyn School Sports Pavillion and Priest Hill Nature Reserve.

Tranquility and remoteness limited (except perhaps along the footpaths) due to urbanising influences on the settlement edge.

Landscape sensitivity is low

**Readily recognisable physical features which are likely to be permanent**

- Most of the boundaries are well vegetated but this is not continuous throughout allowing for glimpse into the site
- The southern and western boundaries are well vegetated with trees/hedgerow planting and fencing that contain the site well.
- BW13–Bridleway to the south is well maintained. Vegetated boundaries but not continuous allowing for glimpses of the open

spaces

- FP104 – Footpath to the north is well maintained. Vegetated boundaries but not continuous allowing for glimpses of the derelict buildings and hardstanding, with access to Ewell East Station.

#### **Views**

- View of Nescot from Reigate Road
- Views to the site are possible from bridleway, BW13, BW112 and footpath, FP104.

#### **Visual sensitivity**

The College part of the site is being considered for inseting (see section 2)

The site is a further education college and adjoining open space. It is not a particularly sensitive landscape as a recreational facility and a character of amenity open space, not rare in the context of the wider character area.

The parcel sits on the edge of settlement and provides the beginning of a gap between settlements and the loss would reduce the gap at the settlement edge of East Ewell.

The site and surrounding character to the north is urbanised in character. The boundaries are well defined.

Overall the site is low sensitivity.

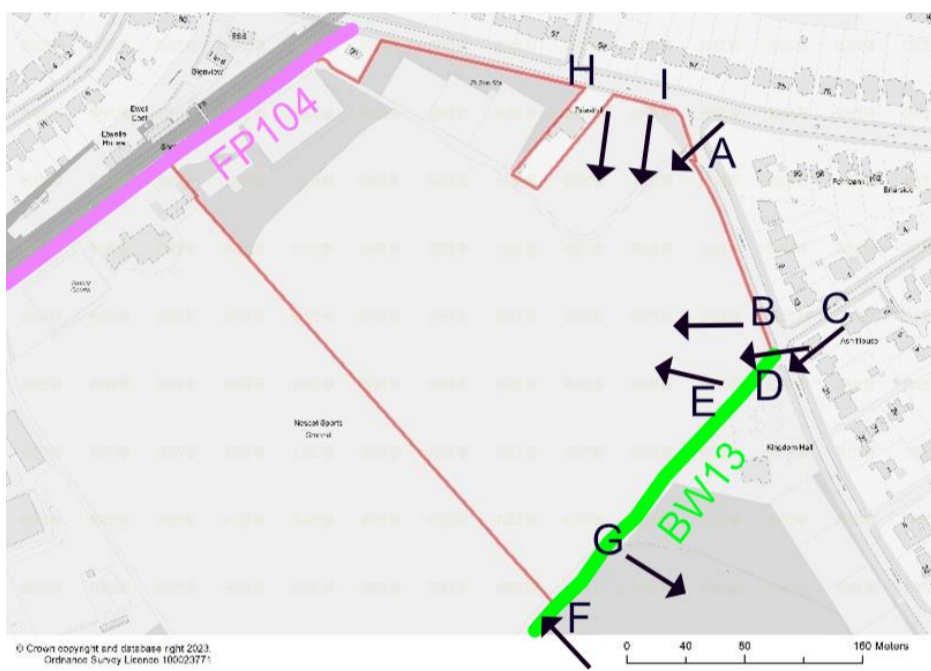
#### **Conclusion**

The landscape sensitivity and visual sensitivity are low. The moderate score from the stage 1 GBBR is noted.

**NESCOT and Land at Priest Hill (within Parcel 43)**

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

**Land at Priest Hill (LAA reference NON013)**



A. Entrance onto the site from Banstead Road



B. View of the site from SE corner of the site from Banstead Road



C. Signage towards Bridleway 43 to the south of the site



D. View of the site and adjacent Bridleway 43



E. View of the site from Bridleway 43, from gap in the vegetated boundary



F. Boundary fencing between the site and adjacent field to the west of the site.



G. Access to the Priest Hill Nature Reserve to the south of the site



H. View of the site from Cheam Road



I. View of the site from Cheam Road

**Current Use/Status.**

- Playing Fields
- Nescot sports ground – football/rugby pitches with associated parking and pavilions/changing rooms.

**Area**

8.63ha

**Promoted for**

The site is being promoted for future residential development.

**Primary Constraints**

None

**Designations**

Adjacent Priest Hill Nature Reserve (SNCI) to the south

**Landscape character and relationship with the wider area**

Located within the National Character Area 114, Thames Basin Heaths and Surrey County Landscape Character Area CF4, North Looe Open Chalk Farmland. The key characteristics of this landscape is north facing slopes and undulating landform rising southward, farmland, arable fields

and sports fields, hedges of varying intactness, limited public rights of way, distant views of the settlement edge. Busy roads and railway line severance.

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

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. Vegetation and trees and fencing line the footpaths. Various glimpses into the site from the edge where the vegetation is not entirely intact, offering glimpses in.

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. The adjacent roads are very busy, Tranquility and remoteness limited (except perhaps along the footpaths) due to urbanising influences on the settlement edge.

Landscape sensitivity considered low.

#### **Readily recognisable physical features which are likely to be permanent**

- Most of the boundaries are fenced off as well as vegetated, the vegetation is not continuous throughout allowing for glimpse into the site
- The southern and western boundaries are well vegetated with trees/hedgerow planting and fencing that contain the site well.
- BW13 – Bridleway to the south is well maintained. Vegetated boundaries but not continuous allowing for glimpses of the open spaces
- FP104 – Footpath to the north is well maintained. Views of the disused tennis courts visible

#### **Views**

- The intersection of Cheam Road and Banstead Road is very exposed and lacks visual containment
- Along the rest of Cheam Road, the site is well screened and not visible. Also the road level becomes lower than the site the further west the road travels
- The boundary along Banstead Road is quite exposed at the intersection with Cheam Road and then further south the road travels with various breaks in the vegetation /tree line.
- Views to the site are possible from bridleway, BW13, BW112 and footpath, FP104.

#### **Visual sensitivity**

The site is a recreational facility and is visually exposed from the intersection of Cheam Road and Banstead Road. It is not a particularly sensitive landscape as a recreational facility and a character of amenity open space, not rare in the context of the wider character area. The parcel sits on the edge of settlement and provides the beginning of a gap between settlements and the loss would reduce the gap at the settlement edge of East Ewell.

The parcel is a managed playing field and the former character of grassland will now reflect more of an amenity grassland. The surrounding character to the north is urbanised.

The boundaries are well-vegetated but there are breakages in the tree line where the site is visible.

Medium visual sensitivity

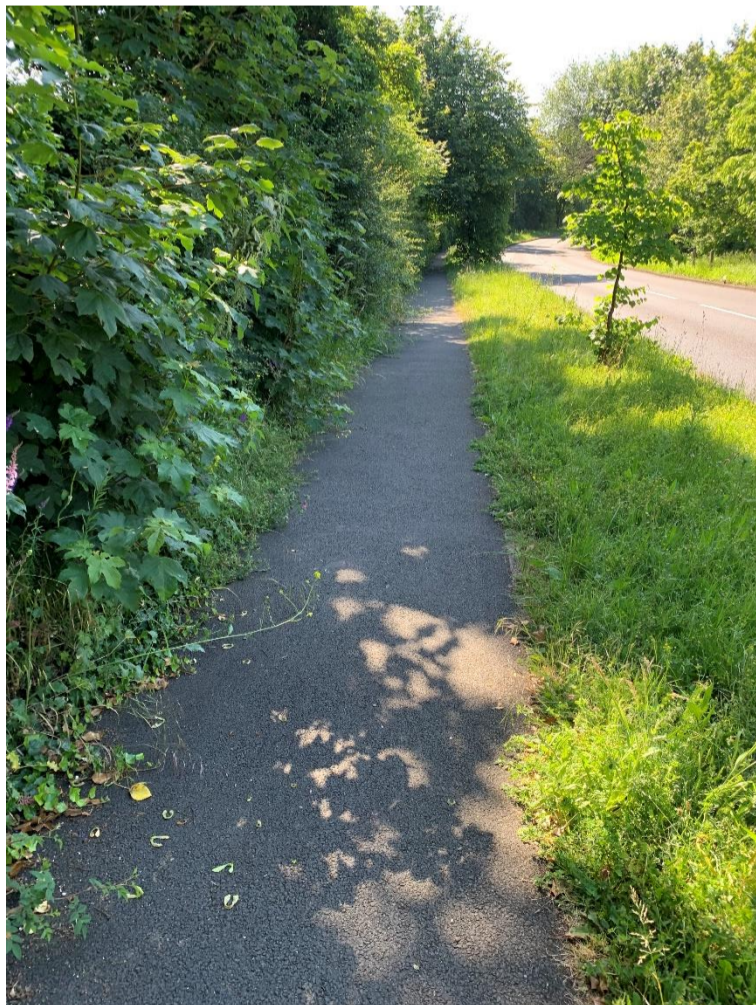
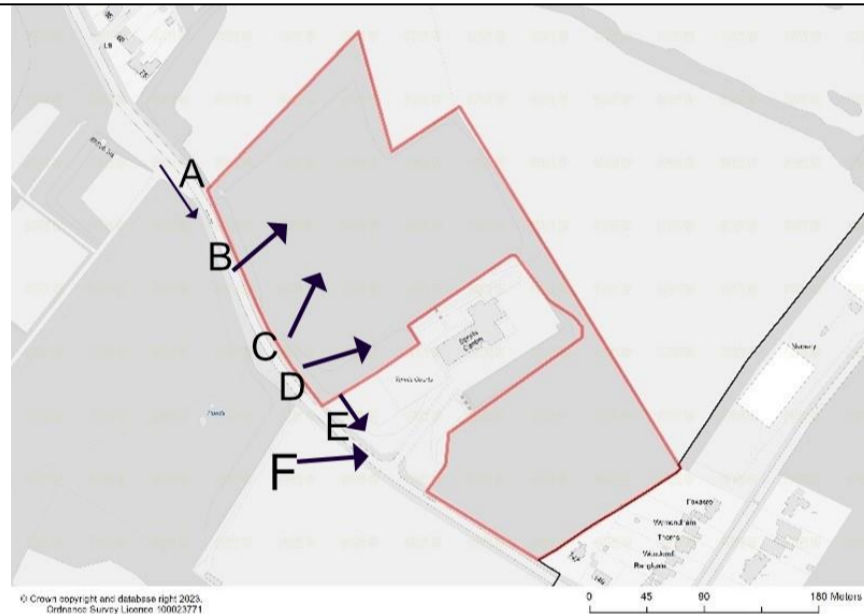
#### **Conclusion**

The landscape sensitivity is low and visual sensitivity is low. The high score from the stage 1 GBBR is noted, Whilst the landscape sensitivity of the parcel is low, the site contributes to the an existing gap between built areas and the redevelopment of the site would reduce this gap,

**Banstead Road (within Parcel 45)**

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

**Banstead Road (LAA reference NON038)**



A. View south down Banstead Road



B. View of the site from gated opening (north) along Banstead Road



C. View of the site from gated opening (south) along Banstead Road



D. View of the site from gated opening (South) along Banstead Road



E. View south of Banstead Road



F. Private gym at the centre of the site.

**Current Use/Status.**

Open space

**Area**

5.98 ha

**Promoted for**

The site is being promoted for future residential development.

**Primary Constraints**

None

**Designations**

Adjacent SNCI

**Landscape character and relationship with the wider area**

Located within the National Character Area 119 North Downs and Surrey County Landscape Character Area CF4, North Looe Open Chalk Farmland. The key characteristics of this landscape is north facing slopes and undulating landform rising southward, farmland, arable fields and sports fields, hedges of varying intactness, limited public rights of way, distant views of the settlement edge. Busy roads and railway line severance.



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 character with development to the north and to the south, the site provides a green wedge between Ewell and moving towards Banstead.

Adjacent to nature conservation sites to the north and west.

Landscape sensitivity is low.

#### **Readily recognisable physical features which are likely to be permanent**

- The boundaries are vegetated but are not continuous, allowing for views into the site.
- The northern, southern and eastern boundaries are well defined by a vegetated edge. There is a sense of continuity and openness with land to the south-east.
- Western boundary, Banstead Road,
- Property boundary of the private gym

#### **Views**

- Views from two access points along Banstead Road.

#### **Visual sensitivity**

The site is unused open greenfield land. The land appears unmanaged and overgrown.

Views from the two entrances are wide and exposed. The site adjoins a private gym and golf course which enable open, undisturbed views.

The parcel sits on the edge of settlement and provides the beginning of a gap between settlements and the loss would reduce the gap and the sense of openness here to the settlement edge of East Ewell.

The boundaries are well-vegetated in parts but this is not continuous, and there are areas where the site is visible.

Visual sensitivity is moderate

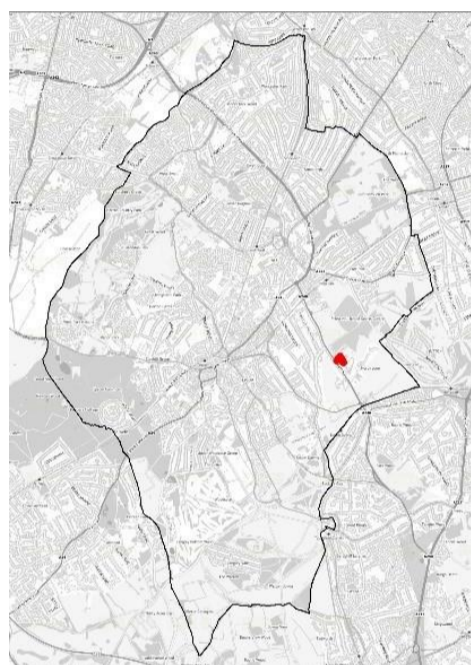
#### **Conclusion**

Landscape and visual sensitivity are moderate. Open land with undisturbed views to the east. The site contributes to the an existing gap between settlements and the loss would reduce this gap or eliminate it entirely.

The Looe, Reigate Road (within parcel 52)

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

The Looe, Reigate Road (LAA reference NON040)



**Current Use/Status.**

Commercial use and single dwelling

**Area**

0.4

**Promoted for**

The site being promoted for future residential development.

**Primary Constraints**

None

**Designations**

Contaminated land

**Landscape character and relationship with the wider landscape**

Located within the National Character Area 119, North Downs and Surrey County Landscape Character Area CF4, North Looe Open Chalk Farmland. The key characteristics of this landscape is north facing slopes and undulating landform rising southward, farmland, arable fields and sports fields, hedges of varying intactness, limited public rights of way, distant views of the settlement edge. Busy roads and railway line severance.

The site existing commercial uses accessed along narrow track. The site is self contained and has little impact on the wider landscape

**Readily recognisable physical features which are likely to be permanent**

Access track and property boundary

**Views**

The site is located down a narrow track and set back from Reigate Road.

**Visual sensitivity**

The site is self contained, visual and landscape sensitivity are low

**Conclusion**

The site is self contained, visual and landscape sensitivity are low

5.10 Below is a summary of the site assessments

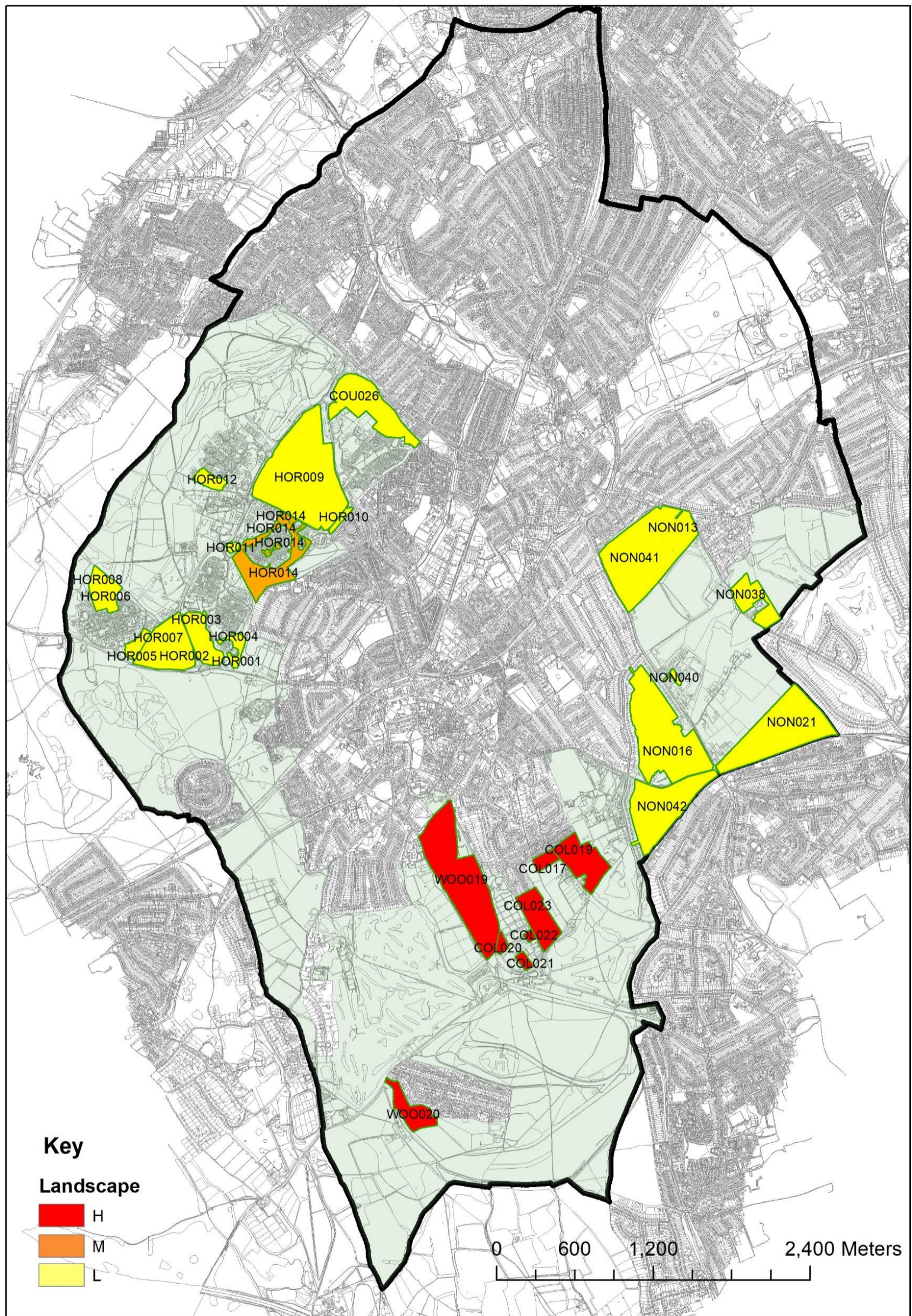


Figure 13 Map of assessed landscape sensitivity

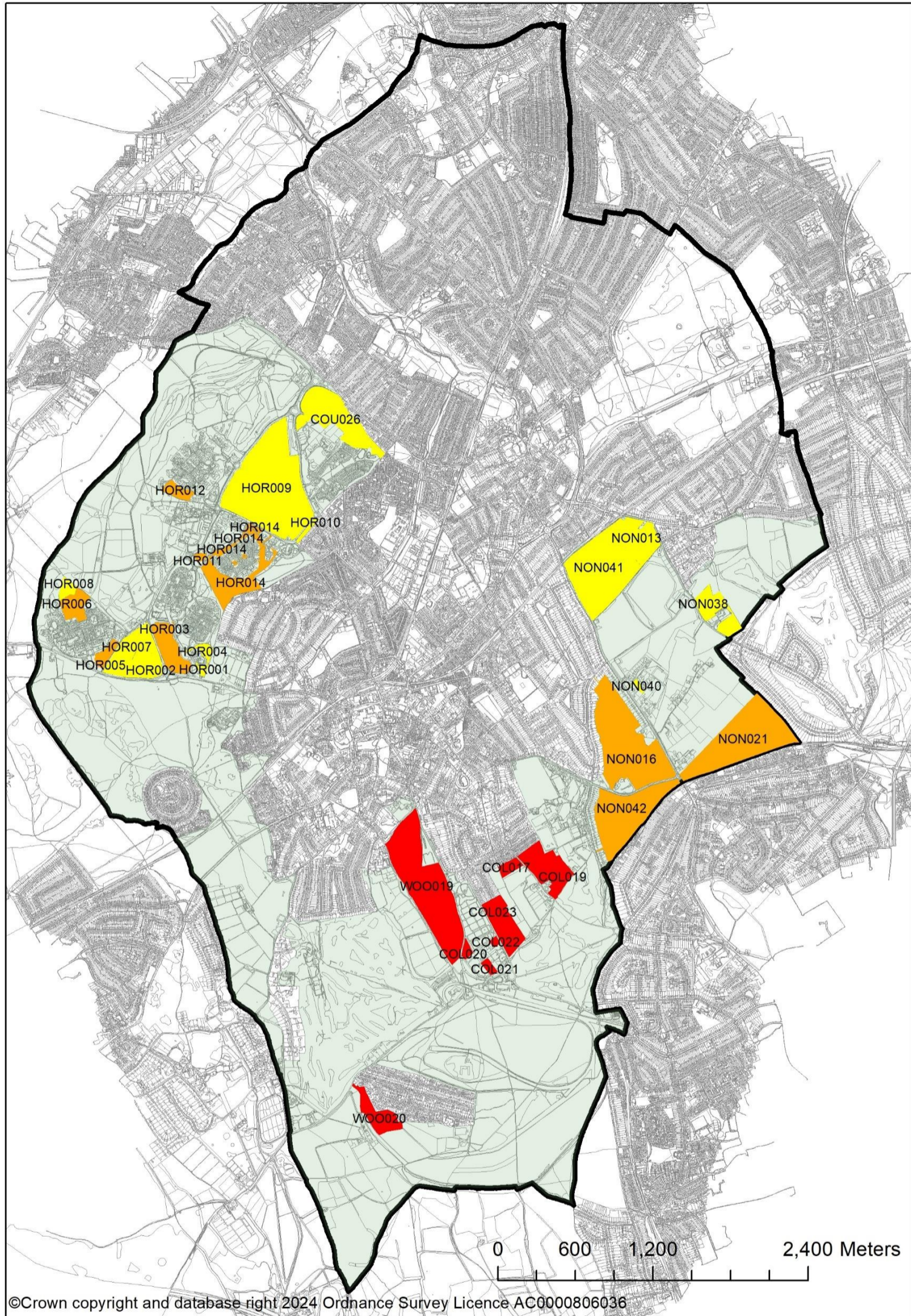


Figure 14 Map showing visual sensitivity score

Table 7. Summary of assessment

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land to the south west of Langley Vale	P1(2) P2(1) P3(2) 5	Land North of Langley Bottom Farm WOO020	WOO020	Landscape and visual sensitivity are high and there is a high overall sensitivity to development where the impact on openness considered to be high. The existing urban edge is rounded off and clearly delineated. The proposed site boundaries do not follow a recognisable feature that is likely to be permanent and is considered to be weak and would extend the urban edge in awkward manner. Therefore the overall integrity of the Green Belt in this location would be considered compromised should the site be released from the Green Belt.	H	H	Does not follow existing physical features. High sensitivity to change. Changing the boundary may compromise the integrity of the boundary here	Does not follow existing physical features. A weak defensible boundary
Land between Downs Road and Ashley Road	P1(3) P2(2) P3(2) 7	Land near Downs Road - north (COL020)	COL020	Landscape and visual sensitivity are high. The site forms part of a wider proposal comprising of a number of sites, where the proposals is for this paddock to be used as a memorial woodland, which would not require inseting from the Green Belt. The site forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the south east which, if released would undermine the integrity of the wider Green Belt in this area.	H	H	Small paddock proposed for woodland use. Not necessary for inseting	Does follow physical features but is a small site and where the proposed use would not be required for inseting

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land between Downs Road and Ashley Road	P1(3) P2(2) P3(2) 7	Land near Downs Road-south (COL021)	COL021	Landscape and visual sensitivity are high. Therefore, impact on openness would be high. The site forms part of a wider proposal comprising of a number of sites, where the proposals is for this paddock to be used as a memorial woodland, which would not require inseting from the Green Belt. The site forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the south east which, if released would undermine the integrity of the wider Green Belt in this area.	H	H	Small paddock proposed for woodland use. Not necessary for inseting	Does follow physical features but is a small site and where the proposed use would not be required for inseting
Land between Downs Road and Ashley Road	P1(3) P2(2) P3(2) 7	Clear Heights, Downs Road (COL022)	COL022	The site forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the south east which, if released would undermine the integrity of the wider Green Belt in this area.	H	H	Landscape and visual sensitiviity, high scoring at stage 1, makes the parcel highly sensitive to development	Follows the physical boundary of the property. Small site that would require inseting, would leave it vulnerable to further infill/inseting of adjacent parcels. Compromising the integrity of the boudnary here
Land to the east of Downs Road	P1(3) P2(2) P3(3) 8	Land near Downs Road-east (COL023)	COL023	Landscape and visual sensitivity are high.  The existing urban edge is clearly delineated and even. The proposed site boundaries would extend the urban edge further south potentially compromising the overall integrity of the Green Belt in this location should the site be released from the Green Belt.  The parcel also forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the south east which, if released would undermine the integrity of the wider Green Belt in this area.	H	H	Landscape and visual sensitiviity, high scoring at stage 1, makes the parcel highly sensitive to development	Follows the physical boundary that is clear and capable of roundsing off the area neatly. However does extend the built up edge further south into elevated landscape Compromising the integrity of the boudnary here

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land between Chalk Lane and Ashley Road	P1(3) P2(2) P3(3) 8	Land near Downs Road-west (WOO019)	WOO019	Landscape and visual sensitivity are high. The site forms part of a wider proposal comprising of a number of sites, where the proposals is for these paddocks to be retained with new footpaths, which would not require inseting from the Green Belt. The site forms part of the gap between the built-up edge of Epsom and Tatennham Corner to the south east which, if released would undermine the integrity of the wider Green Belt in this area.	H	H	The proposed retention of paddocks and introduction of footpaths. Not necessary for inseting	Does follow physical features but is a small site and where the proposed use would not be required for inseting
Land at and immediately surrounding West Park former hospital site	P1(1) P2(0) P3(1) 2	Land at West Park (south) HOR005	HOR005	<p>The quality of the surrounding landscape here is high and well managed however most of the site is PDL and little open area. Therefore landscape sensitivitiy is low. The buildings sit neatly within a parkland setting and site sits within a Conservation Area.</p> <p>The site is fairly self contained, although glimpse of the wider landscape is visible from some of the edge. The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.</p>	L	M	The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.	The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land at and immediately surrounding West Park former hospital site	P1(1) P2(0) P3(1) 2	Land at West Park (North) HOR006	HOR006	The quality of the surrounding landscape here is high and well managed however most of the site is PDL and little open area. Therefore landscape sensitivity is low. The buildings sit neatly within a parkland setting and site sits adjacent to a Conservation Area. The site is fairly self contained, although glimpse of the wider landscape is visible from some of the edge. The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting..	L	M	The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.	The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.
Land at and immediately surrounding West Park former hospital site	P1(1) P2(0) P3(1) 2	Epsom Community Hospital (HOR008)	HOR008	Whilst the buildings adjacent a parkland setting where the quality of the landscape here is high and well managed. The site itself consists of built development that has become derelict and has a neglected appearance. The site is fairly self contained, although glimpse of the wider landscape is visible from various points along the boundary edge. Landscape and visual sensitivity considered to be low. The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.	L	L	The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.	The area of West Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development would fall within the proposed boundary for inseting.



Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land to the east of West Park former hospital site	P1(3) P2(3) P3(2)  8	Nobel Park extension (HOR007)	HOR007	Landscape and visual sensitivity are generally low. Although note the higher score in the GBS Stage One. The development of the parcel would move development closer to Christ Church Road (the B280), removing a gap between the built up parcel. Although the importance of the gap is potentially more on a localised scale as there is built development on either on both sides.	L	L	Landscape and visual sensitivity are generally low.  Although note the higher score in the GBS Stage One.  Site adjacent to SSSI to the south	Follows the physical boundary although is an awkwardly shaped parcel that leaves it vulnerable to further infill of adjacent parcels.
Land to the east of West Park former hospital site	P1(3) P2(3) P3(2)  8	Hollywood Lodge (HOR002)	HOR002	Landscape and visual sensitivity are generally low. Although note the higher score in the GBS Stage One. The development of the parcel would move development closer to Christ Church Road (the B280), removing a gap between the built up parcel. Although the importance of the gap is considered more on a localised scale as there is built development on either on both sides.	L	L	Landscape and visual sensitivity are low.  Although note the higher score in the GBS Stage One.  Site adjacent to SSSI to the south	Follows the physical boundary although is small parcel that leaves it vulnerable to further infill of adjacent parcels.
Land at and immediately surrounding Horton former hospital site	P1(0) P2(0) P3(1)  1	Manor Park (HOR003)	HOR003	Semi natural open space set within conservation area. Landscape sensitivity low and visual sensitivity are moderate within conservation area to the north	L	M	Landscape sensitivity is low and visual sensitivity is moderate.  Low score at stage 1  Site has significant TPO coverage and the site adjacent to SSSI to the south	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

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land at and immediately surrounding Horton former hospital site	P1(0) P2(0) P3(1)  1	Cuddington Glade (HOR001)	HOR001	Landscape sensitivity is low and visual sensitivity is low.	L	L	Landscape and visual sensitivity is low Low score at stage 1 The site contains some trees, some are TPOs. Very small site to consider insetting. Could be considered in the context of insetting adjoining residential at Cuddington Glade	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
Land at and immediately surrounding Horton former hospital site	P1(0) P2(0) P3(1)  1	Land off Cuddington Glade (HOR004)	HOR004	Landscape sensitivity is low and visual sensitivity is low.	L	L	Landscape and visual sensitivity is low Low score at stage 1 Half of the site contains trees, with TPOs. Very small site to consider insetting. Could also be considered in the context of insetting adjoining residential at Cuddington Glade	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
Land at The Manor former hospital site	P1(0) P2(0) P3(1)  1	Horton Hospital, Livingstone Park (HOR014)	HOR014	The visual sensitivity is high and sensitive to change. There would be limited opportunity for development without impacting the existing considered layout and landscape setting.	M	M	Landscape sensitivity is moderate and visual sensitivity is moderate. A lot of the site is covered by ecological designation and heritage designation. overall high sensitive to change.	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  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.
Land at The Manor former hospital site	P1(0) P2(0) P3(1)  1	Land south of West Cottage, Livingstone Park (HOR011)	HOR011	It's location at a prominent corner means the visual sensitivity is high. The site is currently heavily vegetated and views in and out are limited. It forms part of a green buffer between the residential area and main road, Horton Lane. The site is also high sensitivity due to the historic setting set within a highly managed parkland setting	L	M	Moderate sensitivity to change. Changing the boundary may compromise the integrity of the boudnary here	Does not follow existing physical features and would be a weak defensible boundary. Small and awkwardly shaped parcel that leaves it vulnerable to further infill of adjacent parcels.

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land at Clarendon Park (Long Grove former hospital site)	P1(0) P2(0) P3(1) 1	Clarendon Park (HOR012)	HOR012	The landscape sensitivity is low and visual sensitivity is moderate. There are also a number of constraints identified within the parcel that would be sensitive to change.	L	M	Moderate sensitivity to change.  A lot of the site is covered by ecological designation  The area was assessed for potential inseting in Section 2 and the proposed area for inseting excludes this site	Follows the physical boundary although is an awkwardly shaped parcel that leaves it vulnerable to further change  The area of Clarendon Park has been assessed for potential inseting in Section 2 and the proposed areas for potential future development fall outside the proposed boundary for inseting.
Land to the north of Chantilly Way east of Horton Lane	P1(3) P2(3) P3(2) 8	Land at Horton Lane (HOR009)	HOR009	The site is a significant size and fairly flat. It sits in the vicinity of historic settings but is self contained and seprated by major roads therefore it's relationship with these conservation areas are limited. The parcel has well defined robust and durable boundaries on all sides.	L	L	Moderate sensitivity to change. The high score from stage 1 GB Study is noted	Follows a clear physical boundary. The site is surrounded by existing built development and would seem to round off the settlement edge. However most of the former hospital sites are currently washed over by the Green Belt. These have been assessed for potential inseting in Section 2 for inseting
Land to the east of Chantilly Way	P1(2) P2(0) P3(0) 2	Land at Chantilly Way, Epsom (LAA reference HOR010)	HOR010	The landscape sensitivity is low and considered would be limited impact on openness if released. The parcel performs little purpose in Green Belt terms, scoring low in the GBS Stage One.	L	L	Low in terms of landscape and visual sensitivity. Therefore sensitivity to development is low	Follows a clear physical boundary. The site would round off the settlement edge to Chantilly Way, a clear defensible boundary

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land to the north west of St Ebba's former hospital site	P1(2) P2(3) P3(2) 7	Hook Road Arena (COU026)	COU026	The Landscape sensitivity and visual sensitivity is low. The parcel has largely well defined robust and durable boundaries on its north eastern and western boundaries formed by Chessington Road and Hook Road respectively which are also considered capable of forming a new robust Green Belt boundary.	L	L	Low in terms of landscape and visual sensitivity. Note the higher score from stage 1. Therefore sensitivity to development is moderate	Follows physical features with clear durable boundary. The site is an awkward shape that could leave it vulnerable to change
Land to the west of Burgh Heath Road east of Rifle Butts Alley	P1(3) P2(2) P3(2) 7	Land West of Burgh Heath Road (COL017)	COL017	The visual sensitivity is high and landscape sensitivity is high. In addition the parcel forms part of the gap between the urban edge of Epsom to the north and Great Burgh to the south east. The high score in stage 1 is noted.	H	H	High sensitivity to change.	Follows physical feature on most sides except to the south, leaving it vulnerable to further creep further south
Land to the east of Burgh Heath Road south of Beech Way	P1(3) P2(2) P3(2) 7	Land east of Burgh Heath Road (COL019)	COL019	Landscape and visual sensitivity are high. In addition the parcel forms part of the gap between the urban edge of Epsom to the north and Great Burgh to the south east which if released would compromise the integrity of the Green Belt in this location.	H	H	High sensitivity to change. Changing the boundary here extends the settlement edge south and may compromise the integrity of the boundary here	Follows physical boundary. The site is an awkward shape and may make it vulnerable to further infill of adjacent parcels.

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land to the east of Longdown Lane South, south of College Road	P1(1) P2(3) P3(2) 6	Downs Farm (South) (NON042)	NON042	<p>This parcel has a medium sensitivity. It provides a gap between existing development. The site contributes to a series of pockets of land, which together form a gap between the Boroughs of Epsom and Ewell and Reigate and Banstead.</p> <p>The site is also surrounded by development and therefore has already been affected by urbanising features.</p>	L	M	Proposal does not include development in this parcel. Not necessary for inseting	The boundary does follow physical features but the proposed use would not be required for inseting
Land north of College Road west of Reigate Road	P1(1) P2(3) P3(2) 6	Downs Farm (North) (NON016)	NON016 (see P35)	<p>This parcel has a medium sensitivity. It provides a gap between existing development. The site contributes to a series of pockets of land, which together form a gap between the Boroughs of Epsom and Ewell and Reigate and Banstead.</p> <p>The site is also surrounded by development and therefore has already been affected by urbanising features.</p>	L	M	Moderate sensitivity to change. Changing the boundary here extends the settlement edge south and may compromise the integrity of the boudnary here	Follows clear physical boundary. Extends settlement south closing the gap between settlements

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land to the east of Reigate Road north of railway line at North Looe	P1(3) P2(2) P3(3) 8	Drift Bridge Farm (NON021)	NON021	The parcel forms part of the gap between urban areas to the north and south. The railway line that currently separates the site from the settlement of Nork (in Reigate and Banstead) is a strong and clear defensible boundary. If the site were released for development, that boundary would be compromised leaving a less well defined boundary, as well as reducing the gap here compromising the integrity of the Green Belt in this location.	L	M	Moderate sensitivity to change. Changing the boundary here extends the settlement edge north from Nork and may compromise the integrity of the boundary here	Follows clear physical boundaries, however extending north from Nork extends the settlement boundary beyond the railway line- which is a strong enduring boundary, replaced by a weaker boundary, leaving the area between settlements vulnerable to further infilling. Increasing the chances of creep from the south
Land at and associated with NESCOL College	P1(1) P2(3) P3(1) 5	NESCOT (NON041)	NON041	The visual sensitivity are low to medium. Whilst the landscape sensitivity of the parcel is low, the site contributes to the an existing gap between settlements and the loss would reduce this gap, The high score from the stage 1 GBBR is noted.	L	L	Low/Moderate sensitivity to change. The site contains some PDL elements where limited development could take place. The moderate score from the stage 1 GBBR is noted. The site contributes to the an existing gap between settlements and the loss would reduce this gap.	Clear defensible boundaries The site is an awkward shape and may make it vulnerable to further infill of adjacent parcels.  There are PDL elements on the site, so GB boundaries may not need to be amended for limited development
Land to the east of NESCOL College	P1(3) P2(3) P3(2) 8	Land at Priest Hill (NON013)	NON013	The visual sensitivity is low. Whilst the landscape sensitivity of the parcel is low, the site contributes to the an existing gap between settlements and the loss would reduce this gap, The high score from the stage 1 GBBR is noted.	L	L	Moderate sensitivity to change. The high score from the stage 1 GBBR is noted. The site contributes to an existing gap between settlements and the loss would reduce this gap.	Clear defensible boundaries The site is an awkward shape and may make it vulnerable to further infill of adjacent parcels.  There are PDL elements on the site, so GB boundaries may not need to be amended for limited development

Site Description	Parcel score	Promoted Site	Promoted site reference	Conclusion	Landscape sensitivity	Visual sensitivity	Sensitivity to change	Defensible boundaries
Land at DW Fitness Banstead Road	P1(3) P2(3) P3(1) 7	Banstead Road (NON038)	NON038	The visual sensitivity are low to medium. Whilst the landscape sensitivity of the parcel is low, the site contributes to the an existing gap between settlements and the loss would reduce this gap or eliminate it entirely.	L	L	Moderate sensitivity to change. The high score from the stage 1 GBBR is noted. The site contributes to the an existing gap between settlements and the redevelopment of the site would effectively close this gap.	Clear defensible boundaries The site is an awkward shape and may make it vulnerable to further changes
Land to the east of Reigate Road	P1(0) P2(0) P3(1) 1	The Looe, Reigate Road (NON040)	NON040	The site is self contained, visual and landscape sensitivity are low	L	L	Low sensitivity to change	Does follow physical features but is a small site and where the proposed use would not be required for inseting of the Green Belt

## Appendix A

### Summary of Comments received at the Regulation 18 consultation about the Green Belt Technical Note

#### Elmbridge Borough Council:

- EBC note that the Epsom and Ewell Green Belt Technical Note (January 2023) has been prepared to support to Draft Local Plan 2022-2040 public consultation. It sets out the Green Belt evidence used to inform the Draft Local Plan to date and the methodology for future assessments of the Green Belt designation within Epsom and Ewell intended to inform the next iteration of the Local Plan.
- In previous correspondence with EEBC, EBC have made comments regarding the assessment of the Green Belt within Epsom and Ewell against the five purposes of Green Belt as set out in the NPPF. There is still some concern as to the consideration of the setting and special character of 'historic towns' within the methodology.
- In the Epsom and Ewell Green Belt Study, Assessment Report, (February 2017) there are 22 land parcels in the Green Belt that have been identified as either performing highly, moderately or lower against purpose 4 to 'Preserve the setting and special character of historic towns' as per the NPPF. The study went on to conclude that the borough's Green Belt performs a more limited role in preserving the setting and special character of historic towns.
- In line with PAS Guidance, the Elmbridge Green Belt Boundary Review (GBBR) has not applied purpose 4. It is generally felt that this criteria will only apply to very few settlements in practice due largely to the pattern of modern development that often envelopes historic towns today. Whilst it is acknowledged that Conservation Areas and other landmarks have a historic nature / features that should be preserved, it is queried whether these are sufficient to warrant the status / label 'historic town'.

#### Epsom & Ewell Borough Council

- The comments regarding purpose 4 to preserving the setting of historic towns noted and it is accepted that this is generally apply in limited circumstances, not usually where there may impact individual heritage assets but rather where the impact is on historic towns. The review has not taken forward the scores for purpose 4.

#### CPRE Surrey:

- They are unclear why the Green Belt Study Part 2, referred to in paragraph 3.55, was not completed ahead of the release of the draft Plan.
- It is also unclear why only the first of the two Atkins studies of the Borough's Green Belt has been included as an annex to the 2022 Green Belt Study Part 1.
- CPRE Surrey rejects the reasoning behind paragraph 3.57 which needs total revision. There is no case to be made for the proposals to develop housing estates at Horton Lane, the Hook Road Arena and on land near Ewell East Station which all score highly as Green Belt sites.



- It is noted that the Chantilly Way site, unlike Horton Farm, the Hook Road Arena, and land near Ewell East Station, scores low in terms of its Green Belt performance. However, it is suggested that there may be drainage and biodiversity issues associated with this site.
- CPRE Surrey is puzzled that the Council appears to have disregarded evidence from its own Green Belt studies when preparing this Plan. Horton Farm, the Hook Road Arena, and the site adjacent to Ewell East Station are all highly rated in these studies for their Green Belt performance.

Epsom & Ewell Borough Council

The comments regarding the review of the Green Belt Study are noted. The original studies were completed in 2017 and 2018 making them over 7 years old. It is important that the council's evidence base remains up to date and accurate and this is why we will be reviewing and updating this piece of evidence base.

Vail Williams (on behalf of NESCOL?):

- Vail Williams suggest that should the council decide not to amend the Green Belt boundaries, it will be a considerable constraint to the College, especially in regard to the certainty of how educational improvements on the site, and supporting growth and new facilities will be able to be provided.
- They argue that redevelopment and expansion at NESCOL is essential to enhance both the quality and quantity of community, leisure and education provision for existing and new students, & better access to quality facilities for the wider community. They would therefore wish the site to be removed from Green Belt or identified, or allocated for suitable college led development, associated with open space leisure and education, where it is consistent with sensitivities around the Green Belt and the adjacent SNCI. This allocation or identification will reduce risk to any future expansion.
- They note that para 50 of the Local Plan states clearly "*Within the borough there are several areas that are currently designated as Metropolitan Green Belt but are predominantly developed and urban in character. These include parts of the NESCOL college campus (excluding the playing fields) and the five hospital sites which were allocated for residential development in the Core Strategy*".
- They also note that the plan continues to commit that "*A future revision to the Green Belt Study Part 2 will undertake a detailed assessment of Green Belt boundaries in the Borough, the proposed methodology for which is contained in the Part 1 Study (2022).*"

They note that the draft Local Plan para 18 suggests that leisure facilities in the area may need improvement. Given the need to ensure qualitative and quantitative provision, they would look to ensure any education or community use on the site is compatible with the council's wider Leisure Strategy

Epsom & Ewell Borough Council

The comments regarding the opportunity to amend Green Belt boundary are noted. The Council will be looking into whether areas within the existing Green Belt boundary should be considered for Green Belt release/insetting in the updated study.

Savills (re. Downs Farm):

- Savills argue that the LPA should release more Green Belt land in order to meet the housing needs of the borough and the unmet housing needs of surrounding authorities.
- They cite the Duty to Cooperate document (2023) which illustrates the unmet housing needs in Epsom & Ewell and nearby LPAs.
- They go on to state that the Downs Road Site would constitute a case for 'exceptional circumstances' which are required for the removal of the Downs Road site from the Green Belt and suggest this is suitable for allocation for residential development in the Local Plan.

Epsom & Ewell Borough Council

The comments regarding the need to consider amending Green Belt Study to meet future housing need is noted. The Council will be undertaking this assessment in the updated Green Belt Study.

Montreaux (on behalf of Java)

- One way the draft plan proposes to meet its housing requirement is by releasing appropriate sites from the Green Belt and allocating them for development. Java fully support this approach and recommend all sites within the LAA that are not currently allocated are fully assessed and considered as part of the next phase in the local plan review and this should include sites currently located within the Green Belt.
- National Policy states that only those villages whose open character makes an important contribution to the openness of the Green Belt should be included in the Green Belt. Those that do not should be inset, or removed, from the Green Belt and other development management policies used to restrict any inappropriate development.
- National Policy requires that land which it is unnecessary to keep permanently open should not be included in the Green Belt
- The Green Belt Study Part 1 (2022) breaks the Council's Green Belt into 53 land parcels which cover relatively sizable geographical areas. This study identified areas that were considered appropriate for removal from the Green Belt. Some of these areas have not been allocated for development within the draft local plan.
- Given the fact that the Council are currently unable to meet their objectively assessed need of 576 dwelling per annum, as set out in the HEDNA. Java respectfully request that the unallocated sites that have been identified as being appropriate for release from the Green Belt are considered within the Green Belt Study Part 2. This study will undertake a detailed assessment of Green Belt boundaries in the borough, using the methodology contained in the Part 1 Study (2022).
- Sites identified as being appropriate for release within this Part 2 study should be removed from the Green Belt and allocated for development within the Submission Local Plan (Regulation 19) document.

Epsom & Ewell Borough Council

The comments are noted. The Council will be looking into whether areas within the existing Green Belt boundary should be considered for Green Belt release/insetting.

Lichfields:

- Lichfields state their agreement with the LPAs position that exceptional circumstances exist which justify amending Green Belt boundaries to meet housing need, on the basis of a historic under delivery of housing including affordable housing, a lack of five-year housing land supply, a failure of the Housing Delivery Test, increasing levels of homelessness and that as of June 2022, there were 1,200 households on the housing needs register, over 600 of which were identified as being in high housing need.
- They fully agree with the Council's conclusion that exceptional circumstances exist to justify the release of Green Belt land in Epsom and Ewell. The scale of the housing need is significant and past under-delivery has worsened the position. It is clear that the Council has met the tests set out in paragraph 141 of the NPPF by making as much use as possible of land in urban areas and optimising the density of development. As set out above, Epsom and Ewell are not able to rely on neighbouring authorities to assist with any unmet need.
- Therefore, it is entirely appropriate for the Council to release land from the Green Belt to meet housing need and exceptional circumstances exist to justify this.

Epsom & Ewell Borough Council

The comments are noted. The Council will be looking into whether areas within the existing Green Belt boundary should be considered for Green Belt release/insetting.

Downs Farm:

- Lichfields' view is that the Council has not demonstrated that there are strong reasons why the Downs Farm site could not be released for development through the demonstration of exceptional circumstances. The Council has therefore not established that the tipping point (i.e. the maximum amount of Green Belt release on potential sites) falls at the point where Downs Farm is excluded from the plan. We explain our reasoning in the remainder of this section of our representations.
- In the Green Belt Technical Note (2023), the Council identify a number of benefits associated with Green Belt release sites:
  - 1. Delivering a greater mix of homes including the provision of family housing;
  - 2. Delivering a higher proportion of affordable housing due to less complex viability considerations;
  - 3. Ability to deliver Gypsy and Traveller Accommodation, for which no suitable sites have been identified within the Borough.
- In addition to these, they would add the following:
  - 1. Ability to deliver significant areas of public open space for existing and future residents' use;

- 2. Ability to facilitate pedestrian and cycle connections for existing and future residents' use, and promote sustainable travel within the borough;
- 3. Typically able to commence on site quickly to assist with housing supply in the early years of the plan period, whereas complex brownfield sites may have more issues to resolve;
- 4. Overall, boosting housing supply to assist with meeting the significant housing need within the borough.

Epsom & Ewell Borough Council

The comments are noted. The Council will be looking into whether areas within the existing Green Belt boundary should be considered for Green Belt release/insetting.

Carter Jonas (on behalf of Epsom Projects re. Land off Cuddington Glade):

- Considerations of the Green Belt in and around the Borough is, of course, of particular interest to Epsom Projects – Land off Cuddington Glade is currently washed over by the designation – and so this draft policy is one which they would seek to closely scrutinise. As such, they are not convinced that as currently drafted it is clear and unambiguous to allow for efficient decision making, and nor does it obviously accord with national policies for the Green Belt.
- They consider points 1) and 2) in the policy to be sound.
- Whilst point 3) reflects the language of National Planning Policy Framework, the supporting text to the policy, and this criterion specifically, is not clear. This lack of clarity is regarding the use – and definition – of the term infill. In the draft Local Plan, it is suggested that “infill” can be defined as: Limited infilling in developed areas within the Green Belt may also be appropriate, where it can be demonstrated that the site ought to be considered to be within the urban area.
- The usual definition used refers to gaps in an otherwise built frontage, and whilst this can create some tension with “preserving openness” it is less problematic than a definition (as suggested in the draft Local Plan) which suggests that development is acceptable if it could be considered to be part of an urban area. This raises the fundamental question of whether the area in question ought to be ‘washed over’ by the Green Belt in the first place. If an area is predominantly urban in nature it is likely to have a built form which is not open in nature, and therefore is unlikely to perform well against the ‘tests’ of the Green Belt. Land such as this – including the “hospital clusters” – should be ‘inset’ and removed from the Green Belt, through the Local Plan process. Through inseting the “hospital clusters” there is an opportunity to consider the most appropriate and permanent new boundaries for the Green Belt, and Epsom Projects firmly believes that this inseting process should include Land off Cuddington Glade. Releasing the site from the Green Belt – which does not perform well against the ‘tests’ as set out in the Green Belt survey (more on this below) - would allow for the delivery of much needed new homes to help the Council go further in trying to meet the housing needs of its communities.

Epsom & Ewell Borough Council

The comments are noted. The Council will be looking into whether areas within the existing Green Belt boundary should be considered for Green Belt release/insetting.

Comments about National Policy (NPPF) The National Planning Policy Framework (NPPF), at paragraph 140, outlines that: “... *Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.*”

Epsom & Ewell Borough Council

The Comments are noted. The Council will ensure the evidence base is carried out in accordance with national policy and guidance.

Comments about what constitutes “exceptional circumstances” is not defined in national policy, or in the associated Planning Practice Guidance (PPG) and is a matter of planning judgement. This was confirmed by LJ Jay in the Calverton1 case where he noted that (albeit referring to the 2012 iteration of the NPPF):

““Exceptional circumstances” remains undefined. The Department has made a deliberate policy decision to do this, entrusting decision-makers with the obligation of reaching sound planning judgements on whether exceptionality exists in the circumstances of the individual case.”

Calverton is helpful at paragraph 51 where the judgements required in identifying exceptional circumstances are considered. Five ‘matters’ are identified:

- (i): the scale of housing need
- (ii): the inherent constraints on land suitable for sustainable development
- (iii): Patterns of sustainable development
- (iv): the nature and extent of the harm to this Green Belt
- (v): mitigating and managing any resultant impacts on the purposes of the Green Belt

Before considering the ‘matters,’ two other considerations should be noted: First, that the “very special circumstances” test in the Framework – in respect of assessment of planning applications for inappropriate development in the Green Belt – is a: “stricter test than that ...of changing the boundaries of the Green Belt in the local plan.”

This principle has also been held at the high court by Sir Duncan Ouseley. Second: in the same ruling Sir Duncan Ouseley concluded that no more than one individual circumstance was needed. However, exceptional circumstances can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgement, to say that the circumstances are sufficiently exceptional to warrant altering the green belt boundary.

It is noted that the work of reviewing the Green Belt boundaries has not been finished by the Council – they await the second stage of the Green Belt study – so

the answer to all the Calverton 'matters' is not known at this stage. However, the need for homes, other constraints across the Borough and the delivery of sustainable development can all be considered to be reasons enough to review the Green Belt boundaries 'in principle.'

Epsom & Ewell Borough Council

The Comments are noted. Whilst the updated Green Belt Study will not be assessing exceptional circumstances. There will be a separate note/topic paper that will consider the exceptional circumstance case and it will take into account the Calverton case.

Various comments regarding the scores of individual parcels and the potential to release some of these.

Epsom & Ewell Borough Council

The Comments are noted. The study is being reviewed and updated.

- Opposition to new development on the existing Green Belt.
- Development should be focussed on brownfield sites. Examples given
  - Relocate St Ebbas hospital and expand Parkviews Estate
  - Redevelop buildings at Epsom Hospital
  - Redevelop Old Police Station on Church Road
  - Redevelop Watersedge Estate
  - Redevelop the old Organ Inn (CPO if necessary)
  - Redevelop Hollywood Lodge
  - Pockets of land in Livingstone Park
  - Redevelop Kingswood House, Chalk Pit College Road and Former Unigate Dairy
- Suggestions that there are sufficient brownfield sites to meet housing needs; mention of sites on the brownfield register.

Epsom & Ewell Borough Council

The Comments are noted. The study is being reviewed and updated. Any release of land for development from the Green Belt will require an exceptional circumstance case to be made and this will be the subject of a separate note/topic paper.

- Some support/recognition that some Green Belt may be necessary in order to meet housing needs.

Epsom & Ewell Borough Council

The Comments are noted. The study is being reviewed and updated. Any release of land for development from the Green Belt will require an exceptional circumstance case to be made and this will be the subject of a separate note/topic paper.

General comments

- Concerns that borough is already too densely population.
- Concern that if Green Belt boundaries are changed now this will set a precedent of future 'Green Belt loss'.

- Concerns that if Green Belt boundaries are changed now they will 'be lost forever'
- Suggestion that loss of greenfield land should be compensated for by creation of other green spaces.
- Concern that the use of greenfield and Green Belt have been used interchangeably, which is misleading.
- Suggestions that policy should be focussing on 'maximising the benefits of Green Belt land', as stated in para. 145 of the NPPF. Concerns that no mention is made of this.
- Concern that no calculation has been provided that supports the statement that 3.6% of the Green Belt has been released for development.
- Concerns with a lack of a proper definition of 'Limited Infilling' on p. 70 of the draft Plan.
- Suggestions that the Plan does not comply with paras 142 or 143 of the NPPF. Para. 142 states:
  - *'they should also set out ways in which the impact of removing land from Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land'*
- Comparisons drawn to Mole Valley & Elmbridge, who are 'not releasing Green Belt land for development'.
- Comments about uneven distribution of sites being considered
- Concerns about the impact of development on Green Belt land on the overall character of the borough.
- Concerns about the environmental consequences of the loss of Green Belt land.
- Concerns about loss of wildlife & impact on diversity as a result of development on the Green Belt.
- Loss of agricultural land
- Comments suggesting that the Green Belt needs to be made more accessible to the public.
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Epsom & Ewell Borough Council

The comments are noted. The study is being reviewed and updated. Any release of land from the Green Belt will require an exceptional circumstance case to be made and this will be the subject of a separate note/topic paper and the consideration of other matters in addition to Green Belt.