

Royal Borough of Kingston upon Thames

Green Belt and Metropolitan Open Land Assessment

Report



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Report for

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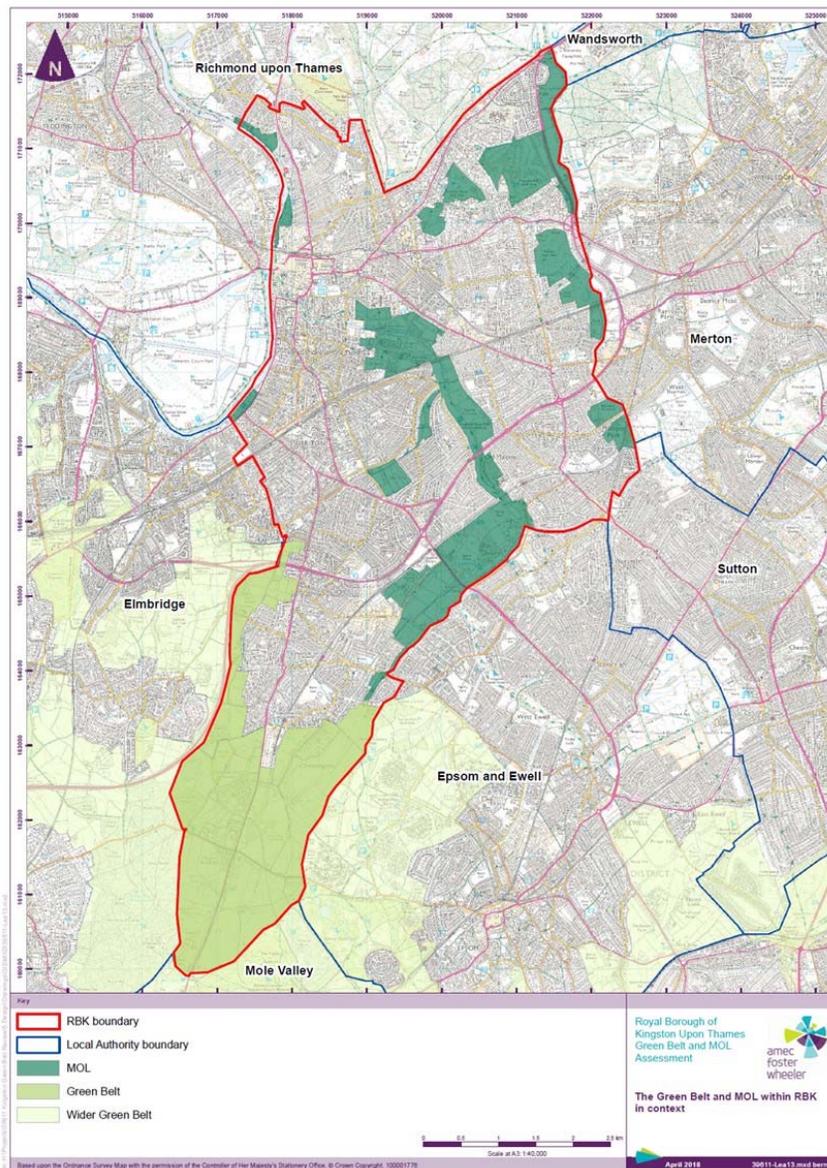


Executive summary

Purpose of this report

1. This report has been produced for the purpose of setting out the results of an Assessment of the role of Green Belt and Metropolitan Open Land (MOL) in the Royal Borough of Kingston upon Thames (hereafter RBK).
2. RBK Council has begun the production of a new Local Plan that will guide development in the Borough until 2041 and is gathering evidence to help inform key land use planning issues. This report forms part of that evidence base.
3. Around one third of the Borough is designated as either Green Belt or MOL (Figure 1), forming part of the Metropolitan Green Belt and the London-wide MOL network. The National Planning Policy Framework (NPPF (2012)) explains that Green Belt designation aims to prevent urban sprawl and keep land permanently open and the London Plan explains that the NPPF (2012)'s Green Belt policies should apply to MOL.

Figure 1 The Green Belt and MOL within RBK in Context





4. The overall aim of the Assessment is to provide RBK with an objective, evidence-based assessment of how the Green Belt with the Borough contributes to purposes set out in the NPPF (2012) and the extent to which MOL meets both Green Belt purposes and the criteria specified in the London Plan.
5. The Assessment covers all of the Green Belt and MOL across the Borough. As Green Belt and MOL boundaries do not always neatly follow administrative boundaries, the Assessment also covers small parts of neighbouring authorities' Green Belt and MOL. Parcels of land are defined as the basis for assessing areas of Green Belt and MOL, an approach which is consistent with studies undertaken in other authorities.
6. A straightforward colouring system (see below) and accompanying commentary is used to set out the conclusions for each parcel and to produce maps which summarise the extent to which each parcel fulfils each Green Belt purpose and MOL criteria along with an overall assessment (a summary matrix and accompanying maps). This provides a tabular and graphical presentation of the contribution of land to Green Belt purposes and MOL criteria.
7. None of the judgements on the relative contribution of the parcel to Green Belt purposes and MOL criteria are scored or weighted and the overall assessment reflects professional judgement on the contribution of the parcel against individual purposes/criteria and overall. Thus a Significant Contribution in respect of a particular purpose or criteria, and a Limited Contribution in all other respects, can lead to an overall judgement of Significant Contribution reflecting the parcel's primary purpose. Equally, Contributions identified across a number of purposes or criteria may still only lead to a judgement of a Contribution overall. The Assessment does not consider specific parcels in terms of their suitability for development.

The Colouring Assessment for Individual Green Belt purposes and MOL criteria

The parcel makes a **Significant Contribution** to a Green Belt purpose/MOL criteria clearly and unambiguously against the assessment purpose/criterion.



The parcel makes a **Contribution** to a Green Belt purpose/MOL criteria against the assessment purpose/criterion, although this is not especially distinct in character and/or has been compromised by development.



The parcel makes a **Limited Contribution** to a Green Belt purpose/MOL criteria because of either performing no clear role in a particular location and/or has been compromised by development.



8. The geography of the Green Belt and MOL within RBK is complex, reflecting the character and evolution of urban development, the location of Borough boundaries and land use. Green Belt and MOL is part of the transition zone between the densely populated suburbs of Greater London, and more open countryside (although in places urbanised) to the south, and in combination with land in adjacent authorities, is the start of the Metropolitan Green Belt which extends around Greater London. As such, land use is often of a diverse 'urban fringe' character and a continuation of MOL which forms the bulk of the open land in the dense urban area of the majority of the Borough, land which is often of significant community value.
9. The assessment of the extent to which land meets Green Belt purposes and MOL criteria is illustrated in Figure 2 and Figure 3. In summary, they demonstrate that at the parcel scale, the Green Belt and MOL in all cases makes at least a contribution to the purposes set for it. Clearly there is significant diversity amongst the contribution made to individual purposes and amongst the fulfilment of MOL criteria, but the broad pattern is clear, including extensive areas making a significant overall contribution, often reflecting a specific purpose, but also their accumulation (particularly in the case of MOL).



Figure 2 Overall Contribution to Green Belt Purposes

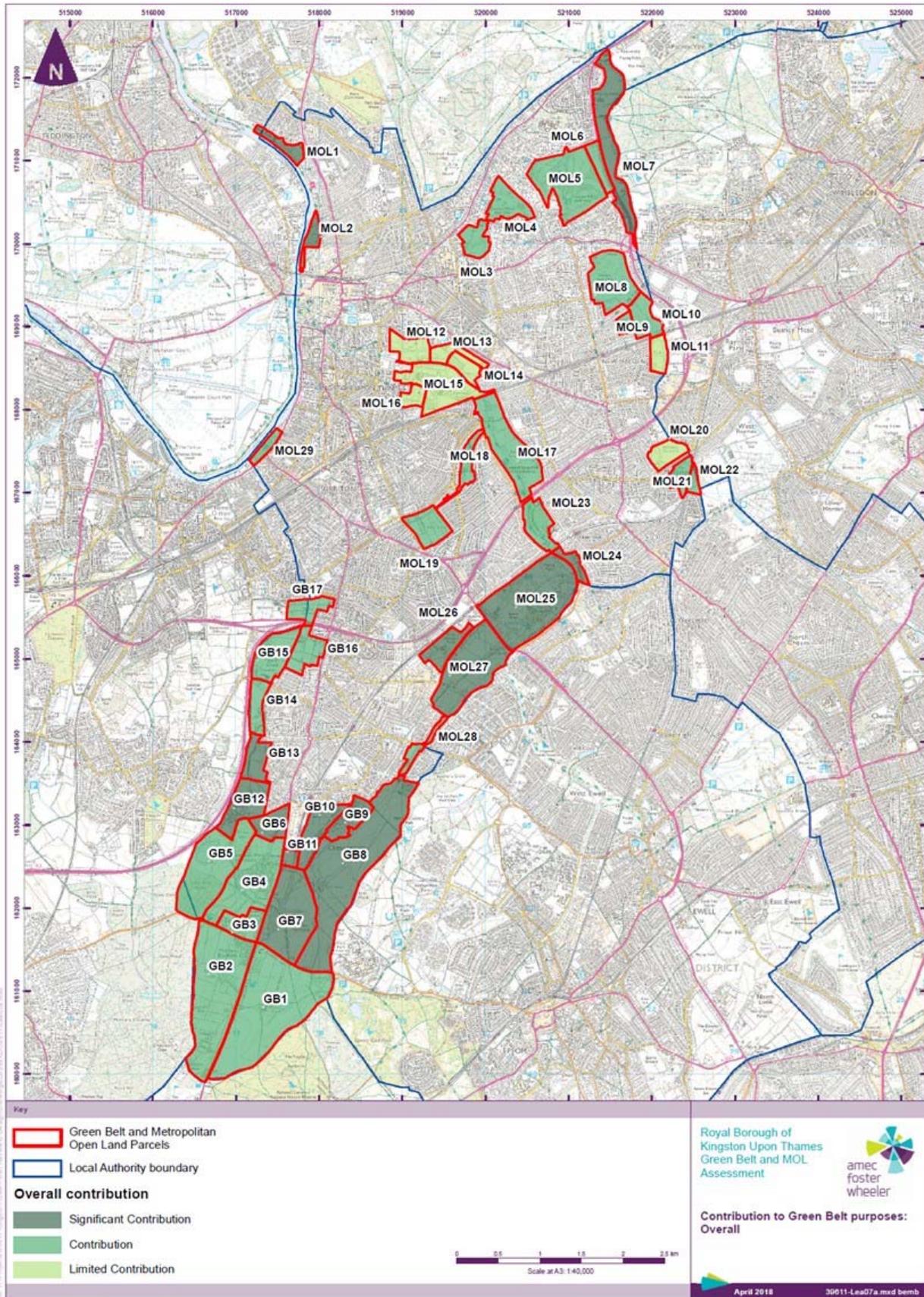
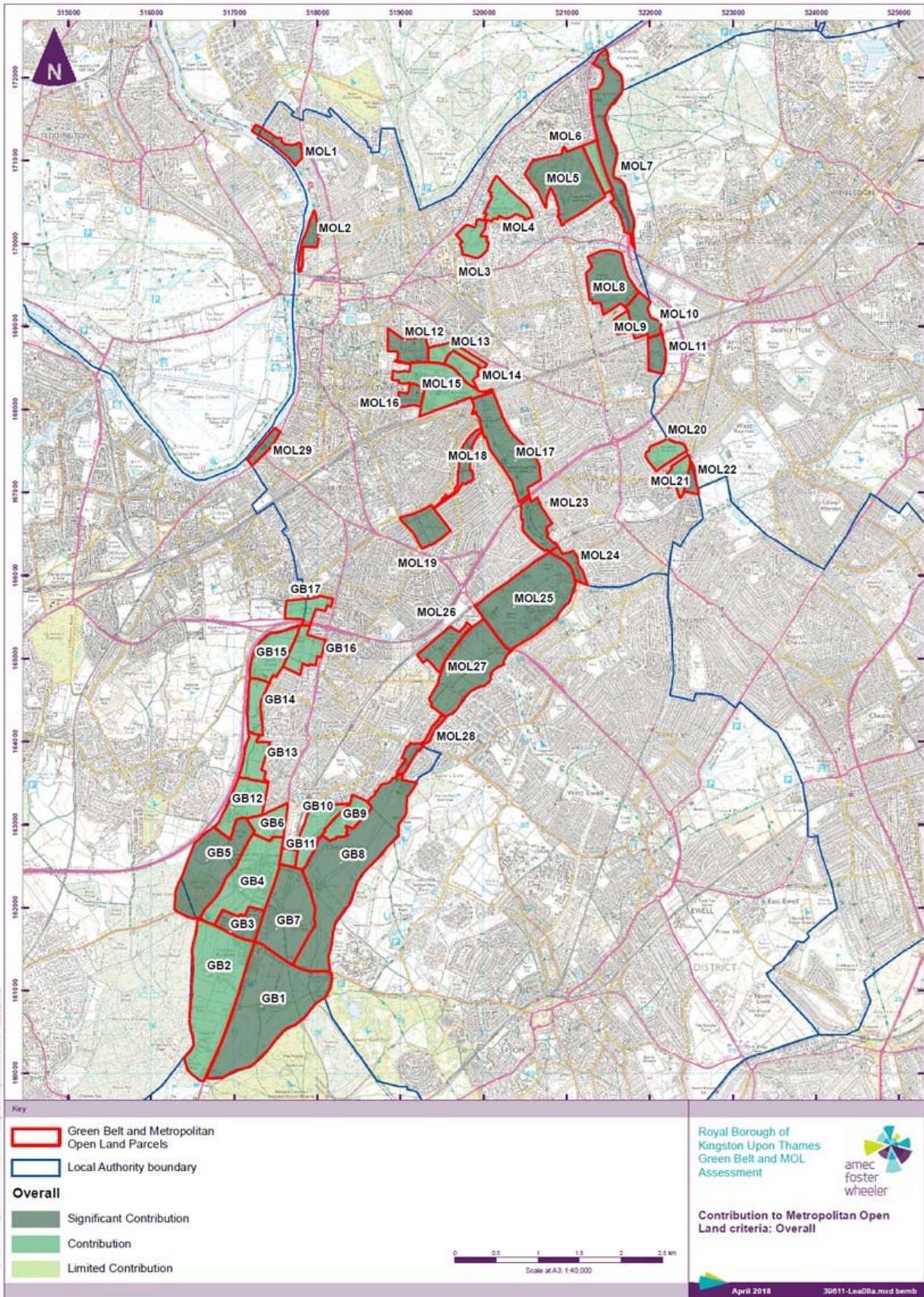




Figure 3 Overall Contribution to Metropolitan Open Land Criteria





Conclusions and Justification

1. The Green Belt within RBK fulfils its intended strategic purpose as part of the Metropolitan Green Belt, with many instances of more than one purpose being met.

The Assessment identifies that all parcels make a Contribution to at least one Green Belt purpose, and in many cases multiple purposes. Strategically, a dominant purpose relates to the containment of sprawl where a number of parcels act in combination to restrain the southward and westward spread of the conurbation at Chessington/Hook. Equally, the Green Belt acts to maintain the separation between towns and associated suburbs (i.e. Kingston upon Thames, Claygate, Oxshott, Ewell and Ashted/Leatherhead). More broadly, the Green Belt contributes to the prevention of the wider encroachment of built development in the immediate vicinity of the built edge of the conurbation and the wider open countryside. Notwithstanding the general fulfilment of Green Belt purposes across the Borough, there are examples where the containment of sprawl, in particular, has been less successful.

2. The Green Belt within RBK should be considered in its strategic context, both in terms of its role as part of the inner edge of the Metropolitan Green Belt and its function in combination with Green Belt in adjacent authorities.

As the inner edge of the Metropolitan Green Belt, the Green Belt within RBK plays a role of particular significance to London as a whole, containing the built edge and maintaining a more or less clear distinction between town and country. Strategically, the Green Belt acts in combination with Green Belt in adjacent authorities to the west, south and east, maintaining separation between towns and maintaining the openness of the countryside generally. In these regards, the purposes of Green Belt policy have broadly been fulfilled, with some localised exceptions, including notably significant built development at Chessington World of Adventures.

3. The criteria set for Metropolitan Open Land by the London Plan are fulfilled to varying degrees, with notable contributions as assets of London-wide importance.

The geography and roles of MOL within the Borough is complex but to varying degrees the land serves the purposes identified in the London Plan. MOL exhibits a wide diversity of land uses, including examples of extensive built development, notably at the Thames Water Sewage Works at Hogsmill. Together, there are significant areas of MOL which are identified as having significance to London as a whole, comprising the context for strategic river corridors such as the River Thames and the Hogsmill River; both of these corridors are identified within the All London Green Grid as being of recreational and nature conservation importance. Equally, there are wider areas of nature conservation and archaeological importance which, whilst not necessarily being of strategic significance, nevertheless are locally important. It is not untypical for MOL parcels to make a contribution to several criteria individually and when considered together overall make a significant contribution to their fulfilment.

4. There are no instances of the Assessment identifying an overall Limited Contribution to Green Belt purposes or MOL criteria.

Notwithstanding the high degree of variance in both form and function, all Green Belt and MOL parcels were found in the Assessment to make at least a Contribution overall to the purposes (Green Belt) or criteria (MOL) set for them. As such, all parcels were found to warrant their designation to greater or lesser degrees, with the relative strength of contribution often (but not exclusively) reflecting a particular role.

5. There are opportunities for positive land management, particularly in urban fringe areas, which would help to strengthen and restore landscape character.



Whilst no significant evidence of the abandonment or degradation of land was encountered in the Assessment, there are various land management interventions which could help to reinforce landscape character and condition. These include the substantiation of landscape elements such as hedgerows, tree planting and the management of unauthorised land uses. In turn, this could help to strengthen the integrity of the Green Belt in particular (compared to MOL, which because of its location and scale, has generally more closely managed land uses).

6. Use of this report

This report is part of the wider evidence base being assembled by RBK as part of the preparation of the Local Plan. As such, the findings and conclusions will be used in conjunction with other evidence studies which together inform decision making. No recommendations are made in the report regarding areas which may or may not hold potential for their status as either Green Belt or MOL to be changed in light of what is termed 'Exceptional Circumstances'. Further detailed work would be required to determine the effects (strategically and locally) of any such proposals.



Contents

1.	Study Remit and Policy Context	1
2.	Assessment Methodology	3
2.3	Approach to the Assessment	3
	Requirements	3
	Principles of the Assessment	3
2.4	Green Belt Purposes and Metropolitan Open Land Criteria	3
2.5	Land Parcel Definition and Analysis	4
2.3	Site Visits and Assessment of Land Parcels	7
2.5	Reporting	9
2.6	Consultation and the Duty to Co-operate Statement	9
3.	Strategic Assessment of the Green Belt and Metropolitan Open Land	13
3.1	The character of the Green Belt and Metropolitan Open Land in the Royal Borough of Kingston upon Thames	13
3.2	Assessment Against Green Belt Purposes and Metropolitan Open Land Criteria	14
3.3	Overview	19
	Land Making an Overall Significant Contribution to Green Belt Purposes	19
	Land Making an Overall Contribution to Green Belt Purposes	19
	Land Making an Overall Limited Contribution to Green Belt Purposes	20
	Land Making an Overall Significant Contribution to Metropolitan Open Land Criteria	20
	Land Making an Overall Contribution to Metropolitan Open Land Criteria	20
	Land Making an Overall Limited Contribution to Metropolitan Open Land Criteria	20
3.4	Analysis by Green Belt Purposes	20
	Checking the sprawl of large built-up areas	20
	Preventing neighbouring towns from merging	22
	Safeguarding the countryside from encroachment	23
	Preserving the setting and character of historic towns	24
	Assisting in urban regeneration	25
3.5	Analysis by Metropolitan Open Land Criteria	26
	Overview	26
	Contributes to the physical structure of London by being clearly distinguishable from the built-up area	26
	Includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London	26
	Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value	26
	Forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.	26
3.6	Comparative Assessment of the Results of Adjoining Green Belt Studies	31
3.7	Major Developed Sites in the Green Belt and MOL	32
3.8	Positive Use of the Green Belt and Metropolitan Open Land	32
3.8	Areas for Consideration for Designation as MOL	33
4.	Study Conclusions and Justification	35
	Table 2.1 Definition of Terms Applied in the Assessment	6
	Table 2.2 Parcel Assessment Criteria	7
	Table 2.3 Organisations Consulted on the Green Belt Review Methodology	9
	Table 2.4 Responses to the Consultation on the Green Belt Review Methodology	10
	Table 3.1 Assessment of Contribution to Green Belt and Metropolitan Open Land Criteria (see Appendix A for detailed parcel-by-parcel assessment)	17



Figure 1	The Green Belt and MOL within RBK in Context	i
Figure 2	Overall Contribution to Green Belt Purposes	iii
Figure 3	Overall Contribution to Metropolitan Open Land Criteria	iv
Figure 1.1	The Green Belt and MOL within RBK in Context	2
Figure 2.1	Parcels Surveyed	5
Figure 3.1	Overall Contribution to Green Belt Purposes	15
Figure 3.2	Overall Contribution to Metropolitan Open Land Criteria	16
Figure 3.3	Contribution to Checking the Sprawl of Large Built-up Areas	21
Figure 3.4	Contribution to Preventing Towns from Merging	22
Figure 3.5	Contribution to Safeguarding the Countryside from Encroachment	23
Figure 3.6	Contribution to Setting	24
Figure 3.7	Contribution to Urban Regeneration	25
Figure 3.8	Contributes to the Physical Structure of London, distinguishable from the built-up area	27
Figure 3.9	Includes open air facilities which serve either the whole or significant parts of London	28
Figure 3.10	Contains features or landscapes of national or metropolitan value	29
Figure 3.11	Forms part of a Green Chain or a link in the network of green infrastructure	30
Figure 3.12	Potential areas for designation as MOL	34

Appendix A	Parcel Assessment
Appendix B	Adjoining Local Authority Green Belt Reviews



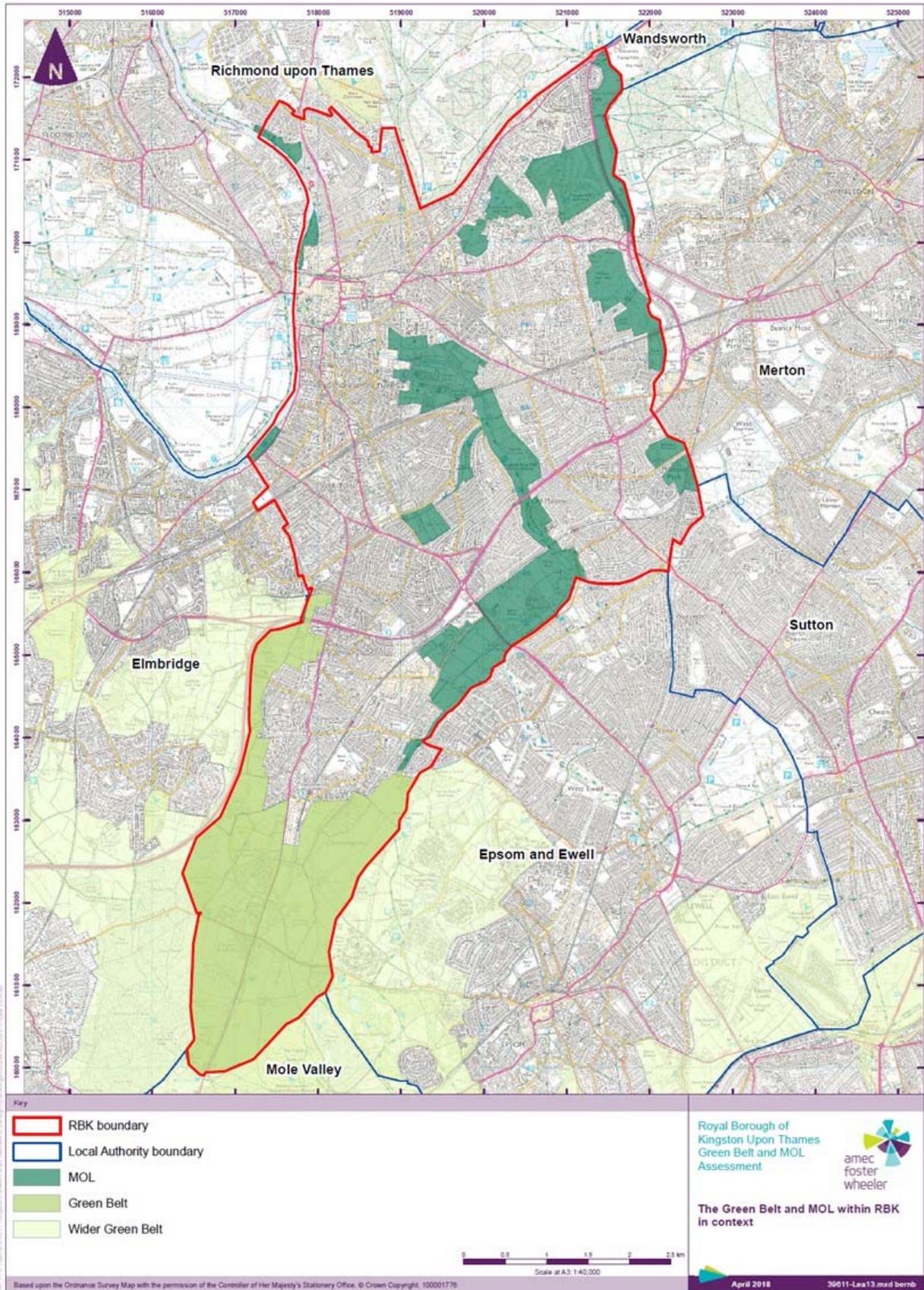
1. Study Remit and Policy Context

1. The Royal Borough of Kingston upon Thames Council (hereafter RBK) has begun the production of a new Local Plan that will guide development in the Borough until 2041. As part of this process, RBK has begun gathering evidence to help inform land use planning decisions, amongst which is an Assessment of the Green Belt and Metropolitan Open Land (MOL).
2. Around one third of the Borough is designated as either Green Belt or MOL (17% Green Belt and 15% MOL), forming part of the Metropolitan Green Belt and the London-wide MOL network. The National Planning Policy Framework (NPPF (2012)) explains that Green Belt designation aims to prevent urban sprawl and keep land permanently open and the London Plan states that the NPPF (2012)'s Green Belt policies should apply to MOL.
3. Given the requirements of the NPPF (2012) and London Plan and that the Green Belt and MOL cover a significant part of the Borough, RBK needs robust evidence to justify the approach that it will take with regard to these designations in its Local Plan. This Assessment will assist RBK in evaluating strategic options for sustainable development but does not indicate the suitability or potential of land for development.
4. The NPPF (2012) allows Councils to alter Green Belt boundaries in Exceptional Circumstances through the preparation of the Local Plan whilst the London Plan also allows Councils to alter MOL boundaries through the Local Plan process.
5. The overall aim of the Assessment is to provide RBK with an objective, evidence-based assessment of how the Green Belt with the Borough contributes to purposes set out in the NPPF (2012) and the extent to which MOL meets both Green Belt purposes and the criteria specified in the London Plan.
6. Figure 1.1 illustrates the extent of the Green Belt with RBK and its connection to the wider Green Belt to the east, south and west, and the extent of MOL designated within the Borough.
7. The remainder of the report is structured as follows:
 - ▶ Chapter 2 describes the study methodology, including the criteria used to assess the Green Belt and MOL.
 - ▶ Chapter 4 sets out the findings of the strategic Assessment.
 - ▶ Chapter 5 sets out the study conclusions and their justification.

The report is accompanied by two Appendices:

- ▶ Appendix 1 which sets out the detailed Green Belt and MOL Assessment, parcel-by-parcel.
- ▶ Appendix 2 which summarises the findings from adjacent Green Belt Reviews undertaken by Elmbridge Borough Council and Epsom and Ewell Borough Council.

Figure 1.1 The Green Belt and MOL within RBK in Context





2. Assessment Methodology

2.3 Approach to the Assessment

Requirements

1. The starting point for the Assessment is the need to assess the whole Green Belt and MOL within the Local Plan area, which in this case is the entire Borough (and not just settlement edges). This enables a transparent approach to be adopted, the results of which will withstand scrutiny and can be readily combined with other elements of the evidence base for the Local Plan as required. The methodology needs to be flexible to allow for conclusions made at a strategic scale to inform locally-specific analysis, enabling the Council to justify its approach to land within the Green Belt and MOL.

Principles of the Assessment

2. To ensure that the Assessment is fit-for-purpose, the methodology:
 - ▶ Uses a logical approach toward parcel definition.
 - ▶ Incorporates the systematic testing of the Green Belt and MOL against NPPF (2012) purposes and London Plan criteria using a clear framework.
 - ▶ Is capable of reproducing similar results if applied by another party.
 - ▶ Is robust and defensible at Examination in Public of the Local Plan through a clear, logical approach which produces meaningful outputs.
 - ▶ Can produce results which are useful to plan and policy making as a key part of the evidence base for the Local Plan.
 - ▶ Ensures that there is broad comparability/compatibility with similar pieces of work undertaken in adjacent authorities as well as those around the country.

2.4 Green Belt Purposes and Metropolitan Open Land Criteria

3. The NPPF (2012) (para. 80) sets out the following purposes for Green Belts:
 - ▶ to check the unrestricted sprawl of large built-up areas;
 - ▶ to prevent neighbouring towns merging into one another;
 - ▶ to assist in safeguarding the countryside from encroachment;
 - ▶ to preserve the setting and special character of historic towns; and
 - ▶ to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
4. The NPPF (2012) (para. 79) also notes the two 'essential characteristics' of Green Belts, that is 'their openness and their permanence'. Permanence is a planning consideration rather than a physical one. Nevertheless, it is recognised that there are benefits in using other features as Green Belt boundaries, where these are clearly defined on the ground and perform a physical and/or visual role in separating town and countryside. Although Green Belts might contain land which is of high quality and possibly recognised as a valued landscape, and land designated as

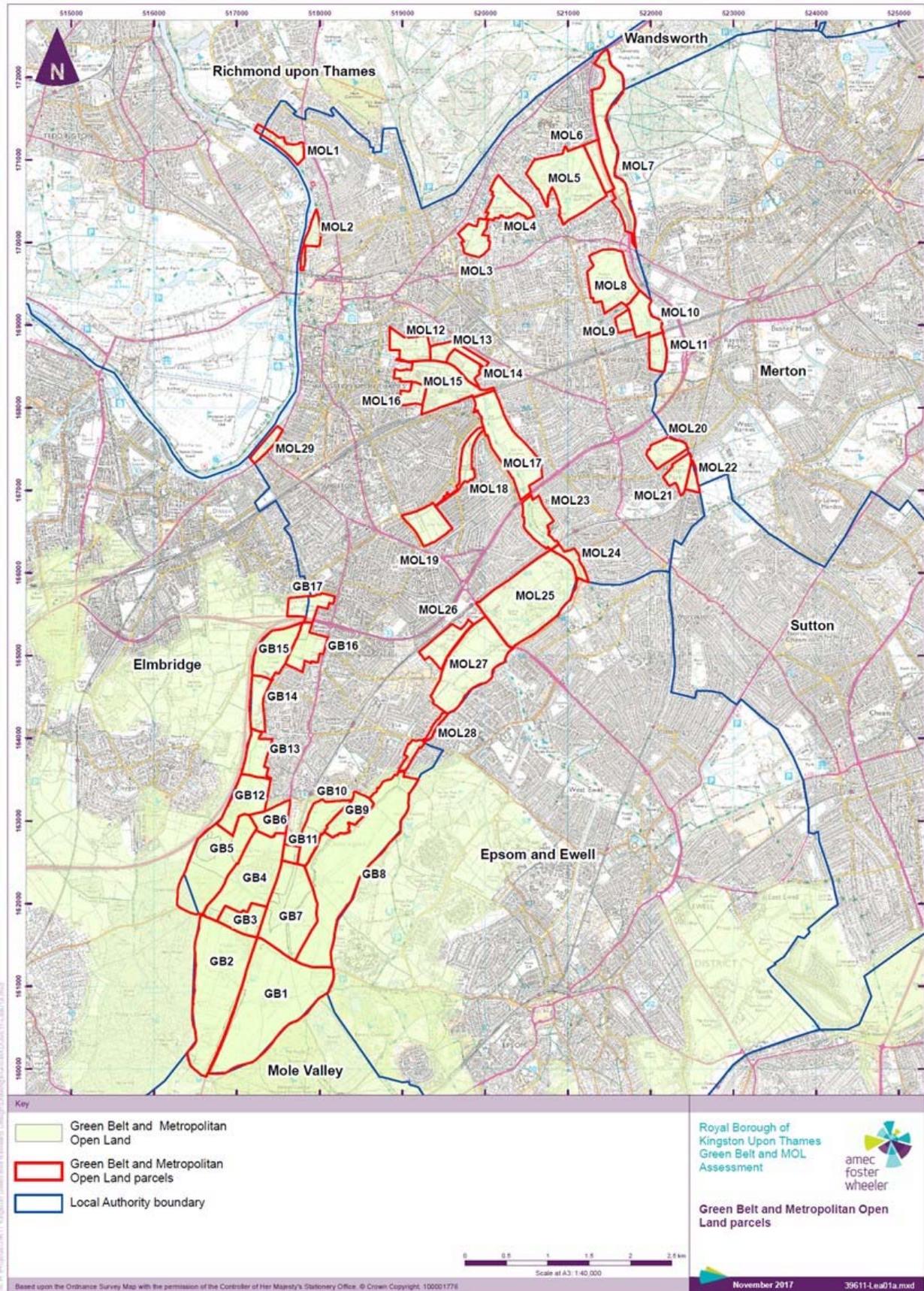


- being of nature conservation value, its purpose is not to protect such features but to keep land permanently open. Openness should not be confused with landscape character of that area.
5. The London Plan (March 2016, Policy 7.17) identifies the following criteria for the designation of MOL, which can be taken as specific qualities against which existing MOL can be assessed:
 - a. it contributes to the physical structure of London by being clearly distinguishable from the built up area
 - b. it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
 - c. it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
 - d. it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.
 6. The London Plan (Policy 7.17 and para 7.56) states that MOL should be treated equally to Green Belt. For assessment therefore, this means the application of both Green Belt purposes and MOL criteria (see section 2.3 below).

2.5 Land Parcel Definition and Analysis

7. The Assessment covers all of the Green Belt and MOL across the Borough. As Green Belt and MOL boundaries do not always neatly follow administrative boundaries, the Assessment also covers small parts of neighbouring authorities' Green Belt and MOL. Such an approach is consistent with the approach taken by studies undertaken in other authorities.
8. Parcels have been defined at an appropriate scale striking a balance between the number of parcels surveyed and the utility of the survey outputs; a small number of large parcels is as unhelpful as a large number of small parcels. Where necessary, sub-parcels (for example down to the field scale) can be identified as part of subsequent work in order to help explore locally-specific issues and/or impacts.
9. Ordnance Survey maps and aerial photos were used in the first instance to identify preliminary Green Belt and MOL parcels for assessment. Well-defined features were used to define the parcels. These features included:
 - ▶ Roads and rights of way of various scales, from rough tracks through to motorways;
 - ▶ A building line that provides a straight logical line and clearly represents the edge of the urban area;
 - ▶ A river, stream, ridge, car park, playground or other physical feature (such as a woodland edge);
 - ▶ An ownership boundary marked by physical features such as a hedgerow or a fence line; and
 - ▶ In the absence of any physical features to follow on the ground to provide a straight line between two permanent physical features.
10. The parcels surveyed are shown in Figure 2.1. Green Belt and MOL parcels have been labelled separately and as far as possible (given restrictions on public access) the boundaries of the parcels were confirmed as part of the site visits.

Figure 2.1 Parcels Surveyed



11. As part of establishing the basis for assessment against the purposes of Green Belt set out in the NPPF (2012) and for MOL against criteria set out in the London Plan, Table 2.1 defines the terms which have been applied in the Assessment.

Table 2.1 Definition of Terms Applied in the Assessment

Green Belt Purpose / MOL Criteria	Definition of Terms Applied in the Assessment
To check the unrestricted sprawl of large built-up areas	<p>Sprawl – spread out over a large area in an untidy or irregular way (Oxford Dictionary online). This includes ribbon development which is development along a main road, especially one leading out of a town or village (Oxford Dictionary Online). This includes historical patterns of, or current pressures for, the spread of all forms of development along movement corridors, particularly major roads.</p> <p>Large built-up areas – in the context of this study these are (broadly): Kingston and New Malden, Tolworth and West Ewell, and Chessington/Hook, Claygate, Oxshott, Epsom and Ashted/Leatherhead.</p>
To prevent neighbouring towns from merging	<p>Neighbouring towns – this relates (locally interpreted) to the relationship between Chessington, Claygate, Oxshott, Epsom/Ewell and Ashted/Leatherhead.</p> <p>Merger/Coalescence – the physical or visual linking of two settlements or areas of built form.</p>
To assist in safeguarding the countryside from encroachment	<p>Encroachment– a gradual advance beyond usual or acceptable limits (Oxford Dictionary online). The countryside – open land with an absence of built development and urbanising influences, and characterised by rural land uses including agriculture and forestry.</p> <p>Openness – a general absence of built development or other urbanising elements (i.e. not openness in a landscape character sense which concerns topography and woodland / hedgerow cover). Whilst vegetation provides visual enclosure this does not reduce openness (in the sense used for Green Belts), even though in practice, it might mean that development does, or could have, less visual impact. Openness as a characteristic can be considered in terms of the scale and density of development. The scale (i.e. the extent) and the density (i.e. the form) of the existing development affects the degree to which a parcel can be considered to be part of the countryside rather than an extension of the urban/settled area, or part of the built-up area in its own right. not all built development is considered to impinge on openness. Green Belt land often includes buildings which, by virtue of their form and arrangement in relation to other development, are considered to be compatible with a Green Belt location. This applies most commonly to rural villages, hamlets and farmsteads, where the scale, form and density of existing development is such that it can be considered to be part of the countryside, rather than an extension of the urban/settled area, or part of the built-up area in its own right.</p>
To preserve the setting and special character of historic towns	<p>Historic town – settlement or place with historic features identified in local policy or through conservation area or other historic designation(s).</p>
To assist in urban regeneration by encouraging the recycling of derelict and other urban land.	<p>Where development in open countryside is likely to render previously developed land in a particular vicinity unattractive to develop.</p>

Green Belt Purpose / MOL Criteria	Definition of Terms Applied in the Assessment
Metropolitan Open Land Criteria	<p>Strategic open land within the urban area that contributes to the structure of London. The strongest protection is given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. The London Plan (March 2016, Policy 7.17) identifies the following criteria for the designation of MOL, which can be taken as specific qualities against which existing MOL can be assessed:</p> <ol style="list-style-type: none"> it contributes to the physical structure of London by being clearly distinguishable from the built-up area it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London it contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value it forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

2.3 Site Visits and Assessment of Land Parcels

- The fieldwork assessed each parcel in respect of its character (land use, degree of openness, relationship to the countryside, and relationship with historic centres) along with the robustness of the boundaries which define that parcel. The purpose of the Assessment is to consider the relative extent to which the land fulfils the purposes of Green Belt or MOL criteria in light of the policies set out in the NPPF (2012) and London Plan.
- In the Assessment, consideration is given to both the strategic and local roles of the Green Belt and MOL generally and in the context of settlement edges, as well as positive uses of the Green Belt and MOL, as identified in the NPPF (2012) (para 81) and London Plan policy 7.17. The results of this exercise are recorded in matrices (Appendix A) which sets out comments on how each parcel performs against Green Belt purposes and MOL criteria.
- Table 2.2 sets out the Assessment criteria which used to assess the contribution of the parcels to Green Belt and MOL criteria. London Plan Policy 7.17 notes that MOL should be given the same level of protection as Green Belt land. As such it is reasonable to test MOL land against both MOL criteria and Green Belt purposes to ensure that due consideration is given to the requirements of Policy 7.17.

Table 2.2 Parcel Assessment Criteria

Topic	Assessment Criteria
NPPF (2012) Purposes of the Green Belt	
To check the unrestricted sprawl of large built up areas	<p>Prevent the sprawl of a built-up area into open land where development would not otherwise be restricted by a permanent boundary.</p> <p>What is the role of the parcel in preventing the extension of an existing development into open land beyond established limits, in light of the presence of significant boundaries?</p>
To prevent neighbouring towns from merging into one another	<p>Prevent development which would result in the merger or erosion of a gap (physically or visually) between settlements.</p> <p>What is the role of the parcel in preventing the merger of settlements which might occur through a reduction in the distance between them?</p>
To assist in safeguarding the countryside from encroachment	<p>Protect the openness of the countryside and its perceived rurality.</p> <p>What is the role of the parcel in maintaining a sense of openness,</p>

Topic	Assessment Criteria
	particularly in light of proximity to a settlement edge?
To preserve the setting and special character of historic towns	Preserve the setting and character of historic town. What is the role of the parcel in respect of the proximity to, and degree of intervisibility with, the core (such as a Conservation Area) of an historic town or settlement?
To assist in urban regeneration by encouraging the recycling of derelict and other urban land	Does the parcel act in concert with adjacent parcels to encourage urban regeneration, either generally or more specifically?
Overall Assessment of Contribution to Green Belt Purposes	In light of the assessment of individual purposes, what is the overall contribution of the parcel to the Green Belt, both individually and in a wider context?
Local Role of the Green Belt	
Preserving the setting and character of villages and other settlements	What is the relationship between a settlement and the surrounding Green Belt?
MOL Criteria (London Plan, Policy 7.17)	
Contributes to the physical structure of London	Is the parcel clearly distinguishable from the adjacent built-up area and thereby making a clear contribution to the physical structure of London?
Includes recreation and other facilities serving either the whole or significant parts of London	Does the parcel include sport, recreation, leisure and cultural facilities which are of strategic importance?
Contains features of national or metropolitan value	Does the parcel contain features or landscapes (historic, recreational, biodiversity) which are of national or metropolitan value?
Is part of Green Infrastructure	Is the parcel part of a Green Chain ¹ or acts as a link in the network of Green Infrastructure?
Opportunities to Promote Positive Use of the Green Belt/MOL	
Current public access and opportunities to provide access/ recreation	What is the degree of existing public access and/or provision of recreational facilities?
Enhancing landscapes and visual amenity	Does the parcel form part of the setting of a sensitive landscape (historic or otherwise)?
Enhancing biodiversity	Are there any national or local biodiversity designations within the parcel?
Improving derelict and damaged land	Is there any derelict land in the parcel?

15. A straightforward colouring system (see below) and accompanying commentary is used to set out the conclusions for each parcel and to produce maps which summarise the extent to which each parcel fulfils each Green Belt and MOL purpose and an overall assessment (a summary matrix and accompanying maps). This provides a simple tabular and graphical presentation of the contribution of land to the purposes of the Green Belt and MOL criteria.

16. None of the judgements on the relative contribution of the parcel to Green Belt and MOL criteria are scored or weighted and the overall assessment reflects professional judgement on the

¹ Green Chains are closely related open spaces of land (or water), linked together with way-marked footpaths and other pedestrian routes. They may connect across borough boundaries. Green Corridors are near continuous areas of open space that link nature conservation sites and act as conduits for plants and animals and which might also serve amenity, landscape and access roles. The Thames is the major green corridor. Source: Thames Landscape Strategy (1994) Chapter 4.

contribution of the parcel to Green Belt purposes individually and overall. Thus a Significant Contribution in respect of a particular purpose, and a Limited Contribution in all other respects, can lead to an overall judgement of Significant Contribution reflecting the parcel's primary purpose. Equally, Contributions identified across a number of purposes may still only lead to a judgement of a Contribution overall.

The Colouring Assessment for Individual Green Belt Purposes and MOL Criteria

The parcel makes a **Significant Contribution** to a Green Belt purpose/MOL criteria clearly and unambiguously against the assessment criterion.



The parcel makes a **Contribution** to a Green Belt purpose/MOL criteria against the assessment criterion, although this is not especially distinct in character and/or has been compromised by development.



The parcel makes a **Limited Contribution** to a Green Belt purpose/MOL criteria because of either performing no clear role in a particular location and/or has been compromised by development.



2.5 Reporting

18. This Report brings together the mapping, fieldwork and preliminary analysis, setting out the approach to the work undertaken, contextual material (such as current stage of Plan-making and the outputs from Green Belt Reviews in adjacent authorities) and adds overarching analysis of the study outputs, including preliminary conclusions. Account is taken of the following Green Belt Reviews: Mole Valley (2013); Elmbridge (2016); Richmond (2006) and Epsom and Ewell (2017). Colour-coded maps illustrate professional judgement of the contribution of each parcel to five purposes of Green Belt, as well as an overall assessment of each parcel's contribution to Green Belt. This provides a clear summary, in light of individual purposes, of the patterns of relative contribution. The Assessment does not consider specific parcels in terms of their suitability for development.

2.6 Consultation and the Duty to Co-operate Statement

19. In order to help promote good planning and fulfil the obligations of the Duty to Co-operate, interested parties were consulted on the study methodology prior to its commencement. Table 2.4 details the organisations who were consulted between 24th March 2017 and 21st April 2017.

Table 2.3 Organisations Consulted on the Green Belt Review Methodology

Epsom and Ewell Borough Council	Richmond Borough Council	Merton Borough Council
Elmbridge Borough Council	Wandsworth Borough Council	Sutton Borough Council
	Mole Valley District Council	North Kingston Neighbourhood Forum

Table 2.4 Responses to the Consultation on the Green Belt Review Methodology

Consultee	Comment	Response and how addressed in the Report
Epsom and Ewell Borough Council	EEBC would question whether the preliminary GB parcels outlined in Appendix 1 are of an appropriate scale. In particular, parcel GB1 appears to perhaps lend itself to further subdivision when considered against the listed defining physical features. However, we acknowledge that the methodology makes provision to enable further sub-division, primarily following the site visits.	Disagree – a logical approach to subdivision has been used which is clearly set out in the methodology. There are no substantive boundaries within Parcel GB1.
	It is unclear whether the assessment will be seeking to assess non-Green Belt and MOL immediately adjoining the same; an approach undertaken by both Elmbridge Borough Council & EEBC's studies. Whilst the number of locations is likely to be limited within RBK, a consistent approach would be encouraged.	Agreed - now addressed in the methodology.
	When considering the 'Definition of Terms' of Purpose 2, EEBC respectively requests that specific consideration and reference is given to Ewell Village and the former hospital cluster settlements in the western part Epsom which remain in the Green Belt.	These developments are noted in the Assessment.
	The Parcel Assessment Criteria is brief, it would be helpful if further clarity/ explanation is given on how the distinction between 'significant contribution', 'contribution' and 'limited contribution' will be assessed.	Assessment of relative contribution is made by professional judgement based on the stated assessment criteria,
	It is noted that the methodology also includes an assessment of the 'opportunities to Promote Positive Use of the Green Belt /MOL' whilst it is appropriate to undertake this assessment as part of the wider scope of the Green Belt and MOL Assessment, EEBC wishes to clarify that outcomes of this exercise will not form part of the scoring of the parcels against the purposes of containing land within the GB or MOL.	Positive use of the Green Belt is specifically referenced in the NPPF (2012) and is dealt with as part of the Assessment and analysis. However, the matter has not influenced the specific assessment of land against Green Belt purposes.
	EEBC welcomes the consideration of GB studies undertaken by neighbouring authorities including our own.	Noted.
Elmbridge Borough Council	As Green Belt is a strategic cross-boundary matter, we consider it beneficial that RBK is undertaking this assessment which will help inform the approach to Green Belt and the preparation of your Local Plan. You will be aware that as part of the preparation of its new Local Plan, Elmbridge Borough Council has undertaken a similar assessment that was published in March 2016. Whilst there are slight variations in approach between our two authorities, it is generally considered that the methodologies are consistent and should provide an important understanding of the role and functions of land designated Green Belt within our two authorities / along our shared borders. The definition of land parcels and looking across administrative boundaries is particularly welcomed, recognising that they 'do not always neatly follow administrative boundaries'. We are conscious that this was a particular concern of RBK when it came to the Elmbridge assessment. The consideration of other local authorities' assessments is also welcomed.	Noted.
	Notwithstanding the above, we would like to raise a few points that we consider would benefit further consideration:	
	1. Defining Boundaries – the majority of features to be used to define parcel boundaries (page 3) are considered to be consistent with para. 85 bullet point 6 of the NPPF (2012) in that they are physical features that are readily recognisable and likely to be permanent. It is understood that a flexible approach to the	Noted, but in the definition of the parcels for this Assessment, clear geographical features (roads in the main) have been used.

Consultee	Comment	Response and how addressed in the Report
	<p>identification of parcels is sometimes required particularly in the environs of more rural areas. As such, it is understood that some boundaries can be defined by what is considered to be additional durable features e.g. streams, ridges etc. However, we do have concern as to the use of car parks and playgrounds. These are not necessarily permanent. In terms of playgrounds these are features that are acceptable within the Green Belt and would form part of the wider area, not a defining boundary. Car parks, unless multi-storey, tend to be open and do not necessarily impact on the openness. It is not considered that they provide a defensible boundary. It is also considered that the appropriateness of using ownership boundaries is slightly dubious unless hedgerows, for example are protected.</p>	
	<p>2. Definitions of Terms to be Applied in the Assessment – please could you confirm the extent of what is being considered as the 'large built-up area' i.e. does this extend southwards to include Chessington but exclude Malden Rushett as it is washed over by Green Belt. We would also query the use of the Green Belt purpose 'to preserve the setting and special character of historic towns' and the consideration of Conservation Areas. In line with PAS Guidance, the Elmbridge Assessment has not applied this purpose. 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'.</p>	<p>The difficulty of dealing with this issue is acknowledged. Applied in the strictest sense, very little Green Belt country-wide contributes to this purpose, however locally the matter is significant in respect of Conservation Areas which together contribute to the historic character of a settlement where the broader identify is ambiguous. This is particularly the case with the London suburbs where the historic of a town or settlement has long been enveloped by extensive development. So, by acknowledging its local role, due consideration can still be given the purpose, although its influence on the overall judgement of fulfilment of purposes is likely to be lessened, which is why the avoidance of a 'scoring and summation' approach is most important.</p>
	<p>3. Opportunities to promote positive use of the Green Belt/MOL - whilst it is considered appropriate to undertake this assessment as part of the wider scope of the Green Belt and MOL Assessment in accordance with the NPPF (2012), the outcomes should not be used to inform the overall scoring of the parcels. The purposes of Green Belt relate to how designated land functions, not its land use or the positive benefits it provides / could provide.</p>	<p>Positive use of the Green Belt is specifically referenced in the NPPF (2012) and is dealt with as part of the Assessment and analysis. However, the matter has not influenced the specific assessment of land against Green Belt purposes.</p>
	<p>4. The Parcel Assessment Criteria – this is brief in detail and it would be helpful if further explanation is given on how the distinction between 'significant contribution', 'contribution' and 'limited contribution' will be assessed.</p>	<p>Assessment of relative contribution is made by professional judgement based on the stated assessment criteria,</p>
	<p>We would welcome further consultation at the appropriate stages as the assessment progresses. In particular, the assessments of Parcels GB17 and GB5 which cross / appear to cross over into Elmbridge Borough and also those located on our boundary (GB2 and GB12 – 15).</p>	<p>Noted.</p>

Consultee	Comment	Response and how addressed in the Report
Richmond Borough Council / Wandsworth Borough Council	In Richmond Borough the River Thames is designated as MOL and Other Site of Nature Importance. The sites MOL 1, MOL 2 and MOL28 lie on the river, and potential development on these sites would have to take account of possible impacts on the openness, character and ecology of the adjoining designated area. MOL 7, Kingston Vale is on the other side of the A3 from Richmond Park, which has protected status as an important habitat for wildlife, is a National Nature Reserve, London's largest Site of Special Scientific Interest and a European Special Area of Conservation.	Noted.
	Just for clarification, I should point out that Green Belt studies have not been undertaken by LB Richmond. However, in 2006 a Review of Land Subject to Protective MOL and OOLTI Designation was carried out on our behalf by Allen Pyke Associates	Noted.
	We have no further comments to make on the proposed methodology. We look forward to considering the outcome of the Assessment along with the emerging Local Plan in the future.	Noted.
Mole Valley District Council	1. On page 3, please add Leatherhead to the list of "neighbouring towns" which will be considered in terms of merging. Although Ashted has a larger population, Leatherhead is the principal town in this part of Mole Valley and its northernmost boundary is a similar distance from the District/Borough boundary. In fact, the residential properties which are in the Green Belt just south of the Kingston boundary (between Oxshott Road and the A243), have Leatherhead addresses.	Agreed – reference is now to Leatherhead/Ashted
	2. On page 2, Mole Valley's 2013/14 Green Belt Boundary Review is named as an example of a "Site-led, non-strategic review" which I don't feel is quite correct. The 2013/14 Green Belt Boundary Review was a background document to consultation on a site allocations plan. However, the Review itself was more comprehensive in scope and was not limited to specific sites.	Reference removed
	3. It may also be worth noting that MVDC's Green Belt Boundary Review did not reach a conclusion, because work on the site allocations plan was terminated in December 2014. However, the current Future Mole Valley consultation identifies a need for further Green Belt Review work, the scope and extent of which will be refined following the current consultation on alternative strategic options for development.	Background noted
North Kingston Neighbourhood Forum	The North Kingston Neighbourhood Area contains two parcels of land designated as Metropolitan Open Land, MOL 1 and MOL 2. These two land parcels have a locally distinctive character because of the river and riverside, and the associated Flora and Fauna. The river banks essentially natural character is locally respected.	Noted.
	As the assessment is carried out following regional and national guidelines, it is important that those locally specific and distinctive features are taken into consideration and given full support for enhancement and/or expansion of our MOL parcels.	Noted.
	The North Kingston Neighbourhood Forum is just embarking on the preparation of its Neighbourhood Plan, as you are aware, it is very early days. We may well be considering our MOL parcels as a part of our Neighbourhood Plan, and would therefore welcome the opportunity of working with the council on all aspects of our Metropolitan Open Land in the North Kingston Neighbourhood Area.	Noted.

3. Strategic Assessment of the Green Belt and Metropolitan Open Land

3. 1 The character of the Green Belt and Metropolitan Open Land in the Royal Borough of Kingston upon Thames

1. The geography of the Green Belt and MOL within RBK is complex, reflecting the character and evolution of urban development, the location of Borough boundaries and land use. Green Belt and MOL is part of the transition zone between the densely populated suburbs of Greater London, and more open countryside (although in places urbanised) to the south, and in combination land in adjacent authorities, is the start of the Metropolitan Green Belt which extends around Greater London. As such, land use is often of a diverse 'urban fringe' character and a continuation of MOL which forms the bulk of the open land in the dense urban area of the majority of the Borough. MOL is spatially complex, reflecting the designation of undeveloped land which is often of significant community value.
2. Green Belt covers largely undeveloped land to the south and southwest of the Borough. The land broadly exhibits an open character (that is largely free from built development) although there are various exceptions including the settlement of Malden Rushett and various substantial business enterprises (garden centres, equestrian centres etc), an electricity substation and various sports-related uses. Many of these land uses are not unexpected in the Green Belt, particularly in such close proximity to a major urban area. The Major Developed Site comprising Chessington World of Adventures is a notable exception, presenting a significant expanse of built form, washed over by Green Belt. Dense woodland cover acts to visually contain development, and filter views, particularly in combination with relatively elevated landform to the south (Telegraph Hill) and south west (Winey Hill). Rough pasture and associated dense hedgerows is common throughout, with arable land offering more extensive views to the south east and south. The visually open character of the Green Belt forms a strong contrast with the extensive dense woodland to the south east (Ashted Common/Epsom Common) and south west (Prince's Coverts). To the west, the A3 forms the dominant boundary feature, although land use and broad sense of openness is shared with Green Belt to the north of Claygate.
3. Notwithstanding proximity to extensive built-up areas associated with Kingston upon Thames and associated suburbs and the consequent diversity of Green Belt character, a general sense of openness (that is the broad absence of built development) has been maintained. Despite some evidence of incremental change associated with land use change (notably to equestrian enterprises), the condition of the landscape appears to be good, with a reasonably strong character.
4. Retention of the general sense of openness across the Green Belt reflects (to a greater or lesser degree) the consistent application of Green Belt policy which has prevented the occurrence of uncontained development, particularly in the vicinity of main roads, and the division between 'town and country' is generally clear.
5. The spatial character and land uses associated with MOL in the Borough presents a not unexpectedly complex picture. This reflects the designation of land which has remained undeveloped for housing or industry for a variety of reasons, and is now set down to recreation, amenity, nature conservation or utility purposes (notably the Major Developed Site of the Thames Water Sewage Treatment Works at Hogsmill. Together, this land helps to structure the urban area, maintain a sense of openness between relatively dense tracts of suburban housing, provide essential recreational space, protect nature conservation interests, and define local character.

6. The diverse roles of this Green Infrastructure are recognised in the London Plan and is part of the specific policy criteria² applied to such land, in addition to being treated as the equivalent of Green Belt (Policy 7.17).
7. Significant tracts of MOL within the Borough are recognised as being part of strategically important wildlife and recreational corridors. For RBK, the All London Green Grid³ identifies the Hogsmill River and the Beverley Brook as strategic corridors of significance to the Capital, with MOL bordering or containing the Hogsmill River from Kingston Cemetery at Norbiton through to Tolworth and Chessington, and similarly for the Beverley Brook from Kingston Vale through New Malden to Motspur Park. These two corridors comprise the majority of MOL in the Borough, although there are significant areas which either stand-alone or are related to land outside the Borough.
8. As noted above, the complexity of land use across MOL reflects its geography, history and significance as community assets. Thus sport and recreation (and associated buildings), both public and private access, forms a significant proportion of land uses, complemented by utilities and reflecting a multifunctional character, extensive tracts of land designated as being of nature conservation value. The majority of the land is managed to a greater or lesser degree, with limited evidence of dereliction or abandonment.

3.2 Assessment Against Green Belt Purposes and Metropolitan Open Land Criteria

9. The assessment of the extent to which Green Belt and MOL meets the purposes set for these designations is illustrated in Figures 3.1 and 3.2 and Table 3.1. In summary, they demonstrate that at the parcel scale, the Green Belt and MOL in all cases makes at least a contribution to the purposes set for it. Clearly there is significant diversity amongst the contribution made to individual purposes and amongst the fulfilment of MOL criteria, but the broad pattern is clear, including extensive areas making a significant overall contribution, often reflecting a specific purpose, but also their accumulation (particularly in the case of MOL).
10. Appendix A sets out the detailed assessment of each parcel. All 46 parcels (both Green Belt and MOL) have been assessed against Green Belt purposes, reflecting the direction in the London Plan (Policy 7.17) that MOL should be given the same protection as Green Belt land. As such, and set out in the methodology for this assessment, there is consequently a need to test MOL land against Green Belt purposes and MOL criteria. For completeness, Green Belt parcels are also tested against MOL criteria.

² MOL criteria (London Plan, Policy 7.17):

- Contributes to the physical structure of London by being clearly distinguishable from the built-up area
- Includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
- Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value
- Forms part of a Green Chain or a link in the network of green infrastructure

³ Mayor of London (March 2012) **Green Infrastructure and Open Environments: The All London Green Grid**

Figure 3.1 Overall Contribution to Green Belt Purposes

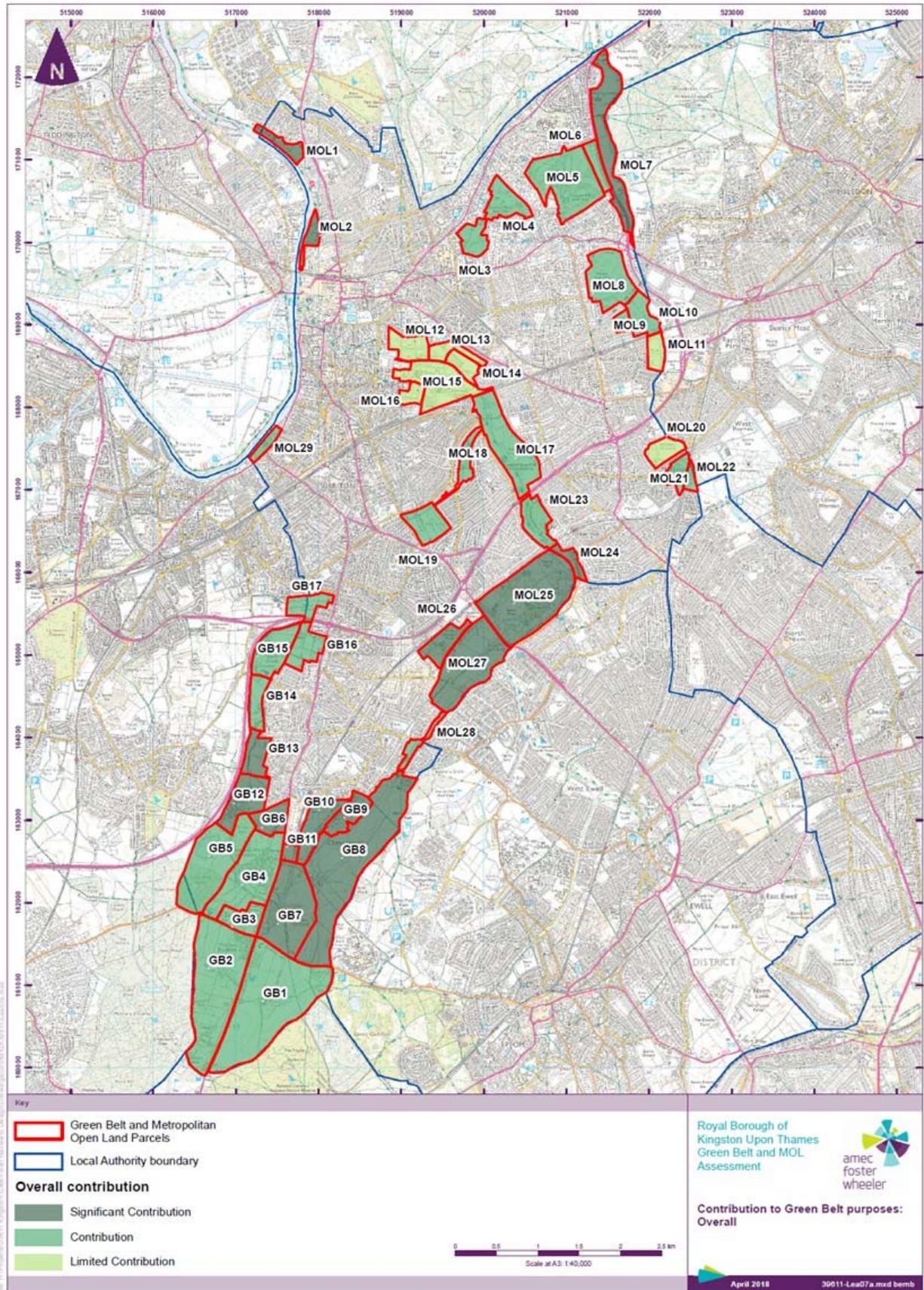


Figure 3.2 Overall Contribution to Metropolitan Open Land Criteria

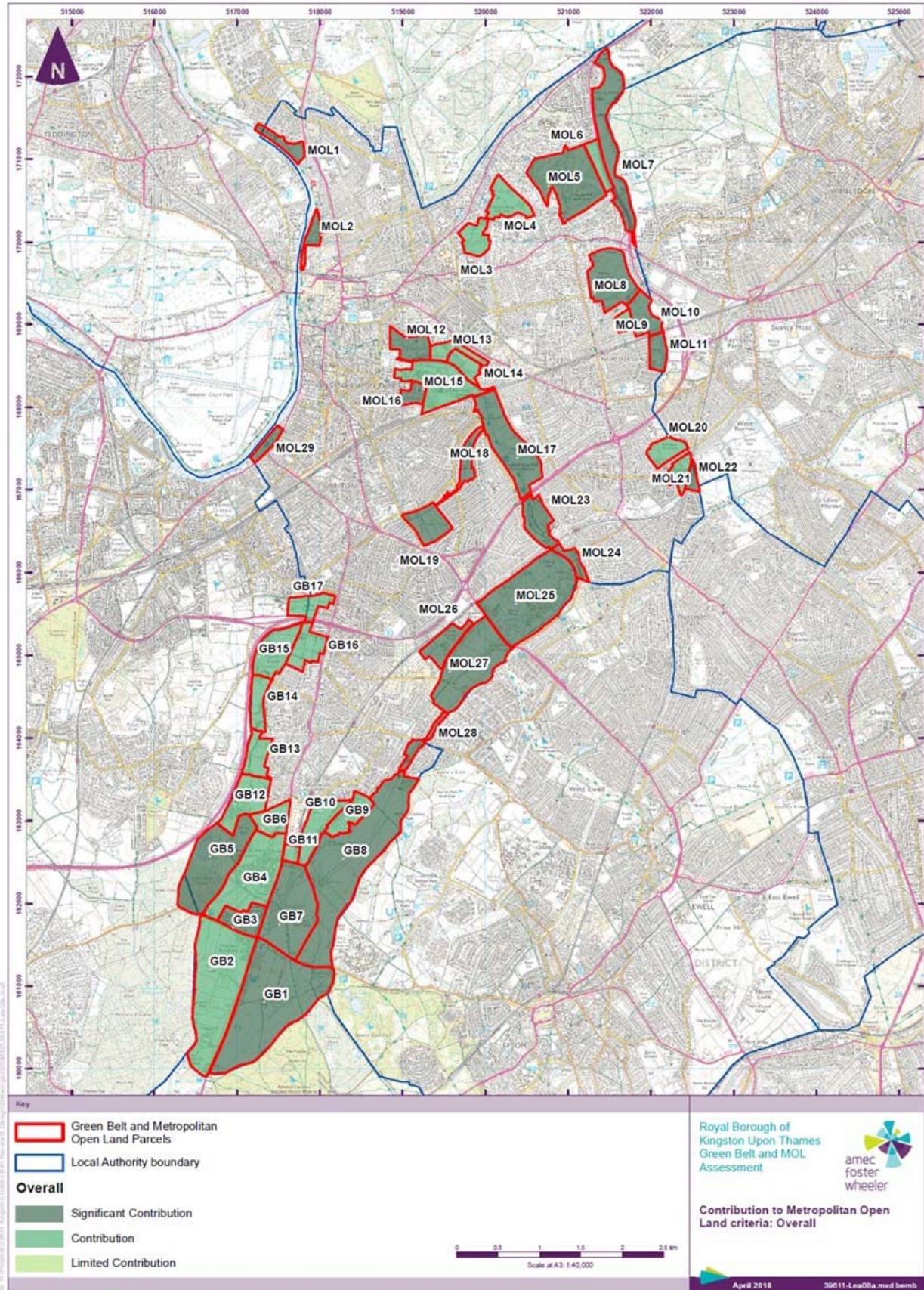


Table 3.1 Assessment of Contribution to Green Belt and Metropolitan Open Land Criteria (see Appendix A for detailed parcel-by-parcel assessment)

Key: LC = Limited Contribution C = Contribution SC = Significant Contribution

	Contribution to Green Belt Purposes						Contribution to MOL Criteria					
	Sprawl	Merger	Encroachment	Setting	Regeneration	GB Purposes Overall	Physical structure	Strategic recreation	Significant features	Green Infrastructure	MOL Criteria Overall	
MOL1	C	C	C	SC	LC	SC	SC	SC	SC	SC	SC	SC
MOL2	LC	C	C	SC	LC	SC	SC	SC	SC	SC	SC	SC
MOL3	LC	LC	LC	C	LC	C	C	LC	C	LC	C	C
MOL4	LC	LC	LC	C	LC	C	C	LC	C	LC	C	C
MOL5	LC	LC	C	LC	LC	C	C	LC	SC	C	SC	SC
MOL6	LC	LC	C	LC	LC	C	C	LC	LC	C	C	C
MOL7	C	SC	C	LC	LC	SC	C	SC	C	SC	SC	SC
MOL8	LC	C	C	LC	LC	C	C	LC	SC	C	SC	SC
MOL9	LC	LC	C	LC	LC	C	LC	LC	LC	C	C	C
MOL10	LC	C	C	LC	LC	C	C	LC	SC	C	SC	SC
MOL11	LC	LC	LC	LC	LC	LC	C	C	SC	C	SC	SC
MOL12	LC	LC	LC	LC	LC	LC	C	C	LC	SC	SC	SC
MOL13	LC	LC	LC	LC	LC	LC	C	C	C	C	C	C
MOL14	LC	LC	LC	LC	LC	LC	C	LC	C	C	C	C
MOL15	LC	LC	LC	LC	LC	LC	C	C	C	C	C	C
MOL16	LC	LC	LC	LC	LC	LC	C	C	SC	C	SC	SC
MOL17	LC	C	C	LC	LC	C	SC	SC	SC	SC	SC	SC
MOL18	LC	C	C	LC	LC	C	C	C	SC	C	SC	SC
MOL19	LC	C	LC	LC	LC	C	C	C	C	C	SC	SC
MOL20	LC	LC	LC	LC	LC	LC	C	C	LC	C	C	C
MOL21	LC	C	LC	LC	LC	C	C	C	LC	C	C	C
MOL22	LC	C	LC	LC	LC	C	C	LC	SC	SC	SC	SC

	Contribution to Green Belt Purposes						Contribution to MOL Criteria				
	Sprawl	Merger	Encroachment	Setting	Regeneration	GB Purposes Overall	Physical structure	Strategic recreation	Significant features	Green Infrastructure	MOL Criteria Overall
MOL23	LC	C	C	LC	LC	C	SC	SC	SC	SC	SC
MOL24	LC	C	C	SC	LC	SC	SC	SC	SC	SC	SC
MOL25	C	SC	C	C	C	SC	SC	SC	SC	SC	SC
MOL26	C	SC	C	LC	C	SC	SC	C	LC	LC	SC
MOL27	C	SC	C	LC	C	SC	SC	SC	SC	SC	SC
MOL28	LC	C	C	LC	LC	C	SC	SC	SC	SC	SC
MOL29	C	LC	C	C	LC	C	SC	SC	SC	SC	SC
GB1	LC	C	C	LC	LC	C	LC	C	SC	LC	SC
GB2	LC	C	C	LC	LC	C	LC	LC	C	LC	C
GB3	C	C	C	LC	LC	C	LC	LC	SC	LC	SC
GB4	C	C	C	LC	LC	C	LC	C	C	LC	C
GB5	LC	C	C	LC	LC	C	LC	LC	SC	LC	SC
GB6	SC	C	C	LC	LC	SC	C	LC	LC	LC	C
GB7	SC	C	C	LC	LC	SC	LC	C	SC	C	SC
GB8	SC	C	C	LC	LC	SC	C	C	SC	C	SC
GB9	SC	C	C	LC	LC	SC	C	C	C	C	C
GB10	SC	C	C	LC	LC	SC	C	C	C	LC	C
GB11	SC	C	C	LC	LC	SC	C	LC	LC	LC	C
GB12	SC	SC	C	LC	LC	SC	C	LC	C	LC	C
GB13	C	SC	C	LC	LC	SC	C	LC	LC	LC	C
GB14	C	C	C	LC	LC	C	C	LC	LC	LC	C
GB15	C	LC	C	LC	LC	C	C	LC	LC	LC	C
GB16	C	LC	C	LC	LC	C	C	LC	LC	LC	C
GB17	C	LC	C	C	LC	C	C	LC	LC	LC	C

3.3 Overview

11. The results of the Assessment, mapped in Figures 3.1 and 3.2 and detailed in Table 3.1 and Appendix A, demonstrate the widespread meeting of Green Belt purposes and MOL criteria. All parcels make at least an overall contribution to Green Belt and MOL criteria, reflecting the role of the Green Belt as the inner edge of the Metropolitan Green Belt and a combination of strategic and localised roles for MOL parcels. Together, Green Belt and MOL help to maintain a clear distinction between town and country, and to a lesser degree between some of the suburbs within the Borough.
12. The Green Belt within RBK, in combination with land in adjacent local authorities, acts to maintain the separation towns. Strategically, these are: Kingston upon Thames, Claygate, Oxshott, Ashted/Leatherhead and Ewell. This strategic function is complemented by the containment of pressures for the sprawl of suburbs, particularly along transport corridors. It is this tendency which has largely been checked by the Green Belt, consequently retaining a distinction between town and country. By largely preventing incremental change within open countryside, the open character of land beyond the urban edge has been maintained. The geography of the Green Belt within RBK is important in this regard, being the inner edge of the Metropolitan Green Belt, containing the contiguous suburbs of London and being part of the transition zone to open countryside.
13. Despite the extent of control over development afforded by Green Belt policy, the presence of significant development within the Green Belt has compromised its quality of openness in some localities, undermining its strategic function. This is of various scales, from small scale accumulation of built structures associated with horse keeping to the more substantive and systematic development of large-scale leisure-related development.
14. The following paragraphs summarise the broad form and function of the Green Belt across the study area.

Land Making an Overall Significant Contribution to Green Belt Purposes

15. The bulk of Green Belt land which is judged to make a significant contribution acts to contain the built edge of Kingston upon Thames at Chessington and Hook, where contiguous built development is largely uncontained by significant boundaries. Many of these parcels are related to the wider Green Belt in adjacent local authorities, in turn part of the inner edge of the Metropolitan Green Belt which extends southwards. Development would compromise the functioning of the Green Belt, primarily in respect of preventing the sprawl of the conurbation particularly along transport corridors (notably the A243), but also in maintaining separation between towns, notably between Kingston upon Thames and Claygate (notwithstanding the presence of the A3), and to a lesser degree Kingston upon Thames and Ewell (Horton), and between Kingston upon Thames and Ashted/Leatherhead.
16. Locally, various MOL parcels make a significant contribution to Green Belt purposes. Typically, they have an enclosed character, but help to prevent the merger of specific areas (albeit often far from being clearly differentiated given the character of suburban areas). In three instances, MOL helps to provide the setting for sensitive areas, notably along the River Thames and at Old Malden.

Land Making an Overall Contribution to Green Belt Purposes

17. Land making a contribution Green Belt purposes overall accounts for the majority of Green Belt and MOL parcels, reflecting the meeting of at least one purpose. Whilst many Green Belt and MOL parcels contribute to multiple purposes, this does not necessarily 'add up' to a significant contribution, but rather reinforces the point that Green Belt plays multiple roles and that these can be undermined through incremental change.

Land Making an Overall Limited Contribution to Green Belt Purposes

18. A number of MOL parcels have been identified as making an overall limited contribution to Green Belt purposes, reflecting the absence of a clear strategic or local role. However, for Green Belt parcels, none have been identified as making a limited contribution overall, reflecting both their multiple roles and particular importance as part of the inner edge of the Metropolitan Green Belt.

Land Making an Overall Significant Contribution to Metropolitan Open Land Criteria

19. The majority of MOL parcels are judged to make an overall significant contribution to MOL criteria, reflecting their fulfilment of multiple purposes set by the London Plan and critical role as part of the character of specific localities. Strategically, many of the MOL parcels are of significance to London as a whole, being part of networks of greenspace which have been identified as part of the All London Green Grid. Six Green Belt parcels are judged to make a significant contribution to MOL criteria largely based on the presence of biodiversity, archaeological and recreational resources.

Land Making an Overall Contribution to Metropolitan Open Land Criteria

20. Some nine MOL parcels and eleven Green Belt parcels have been identified as making an overall contribution to MOL criteria. This reflects their more localised role (in terms of the London Plan), but which can be significant to the character of a local area.

Land Making an Overall Limited Contribution to Metropolitan Open Land Criteria

21. No parcels of land surveyed were found to make a Limited Contribution to MOL criteria, with all parcels making a contribution or significant contribution to at least one criterion.

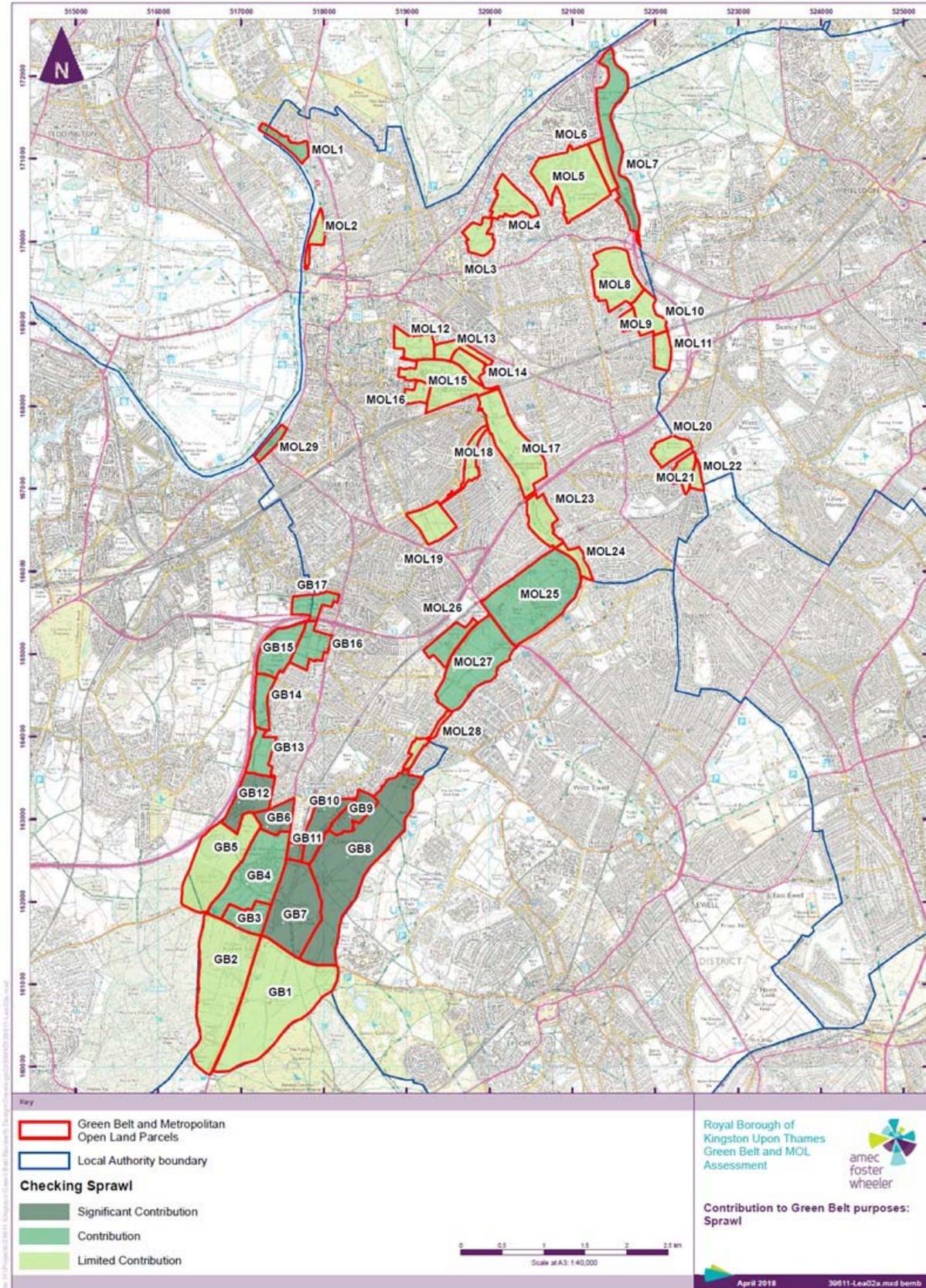
3.4 Analysis by Green Belt Purposes

22. The following sections review the role of the Green Belt and Metropolitan Open Land in respect of the five purposes identified in the NPPF (2012). As noted in the methodology, there is consideration of both strategic and local matters in respect of contribution to Green Belt purposes, notably in respect of historic towns. Conservation Areas are used as a proxy for areas of historic interests to which Green Belt and MOL can contribute by way of providing part of their context.

Checking the sprawl of large built-up areas

23. The location of the parcels which make a significant contribution to this purpose are unsurprisingly related to the immediate urban edge, where the Green Belt checks the spread of the contiguous built area, but also to transport corridors where there are pressures for (and evidence of) change. The inner edge of the Metropolitan Green Belt plays a significant role (supported by the wider Green Belt) in containing the tendency associated with large urban areas for unconstrained sprawl particularly along transport corridors. Within RBK, this role is clearly of particular significance, in relation to the suburbs of Kingston upon Thames at Chessington and Hook which abut the inner edge of the Metropolitan Green Belt.

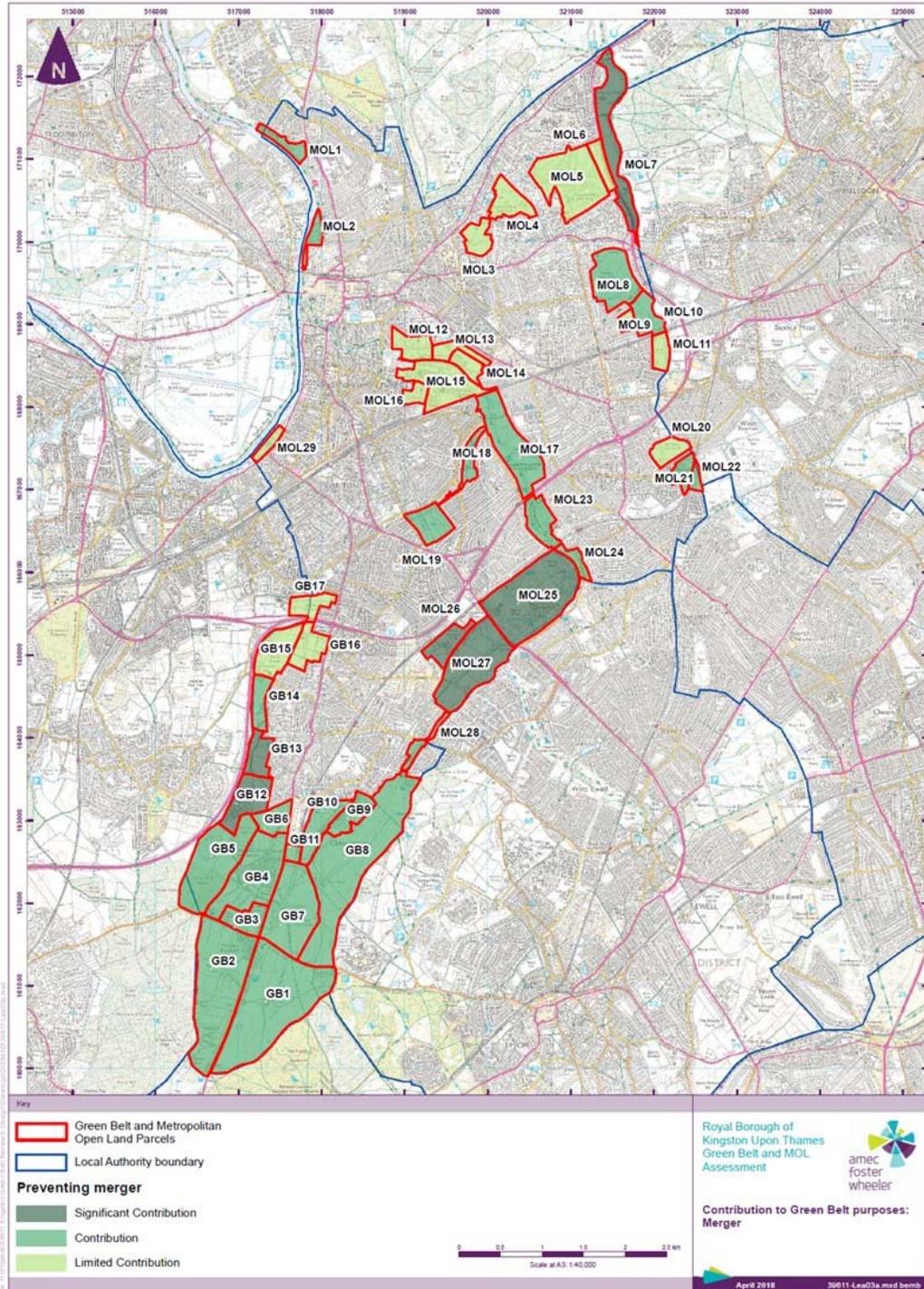
Figure 3.3 Contribution to Checking the Sprawl of Large Built-up Areas



Preventing neighbouring towns from merging

24. Maintenance of the separation of Kingston upon Thames (at Chessington/Hook) from Claygate is a clear strategic role of the Green Belt, notwithstanding the presence and use of the A3 as a containing boundary to Claygate. To a lesser degree this is also the case between Kingston upon Thames and Ewell (at Horton) where there is evidence of recent change through redevelopment of brownfield land and infilling, between Kingston upon Thames and Ashted/Leatherhead and between Kingston upon Thames and Oxshott.

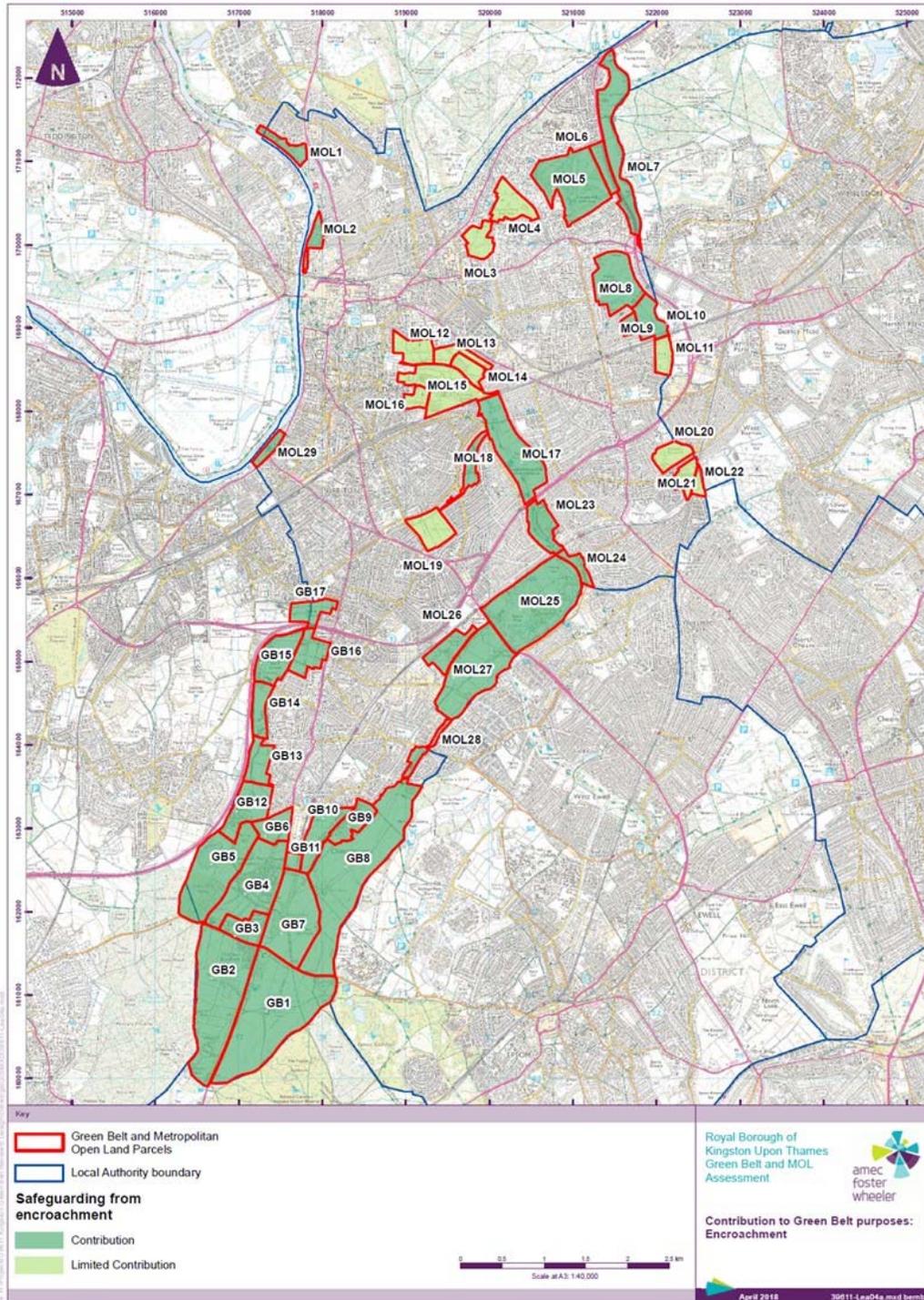
Figure 3.4 Contribution to Preventing Towns from Merging



Safeguarding the countryside from encroachment

25. This is a typically more generalised purpose, related to incremental change (either actual or potential) whereby land becomes progressively urbanised and losing its quality of openness. No parcels have been identified as making a significant contribution in this respect, reflecting the broad containment of development which results in a clear distinction between town and country and the wider regulation of incremental change within open land which, over time, can result in an urbanised appearance and function.

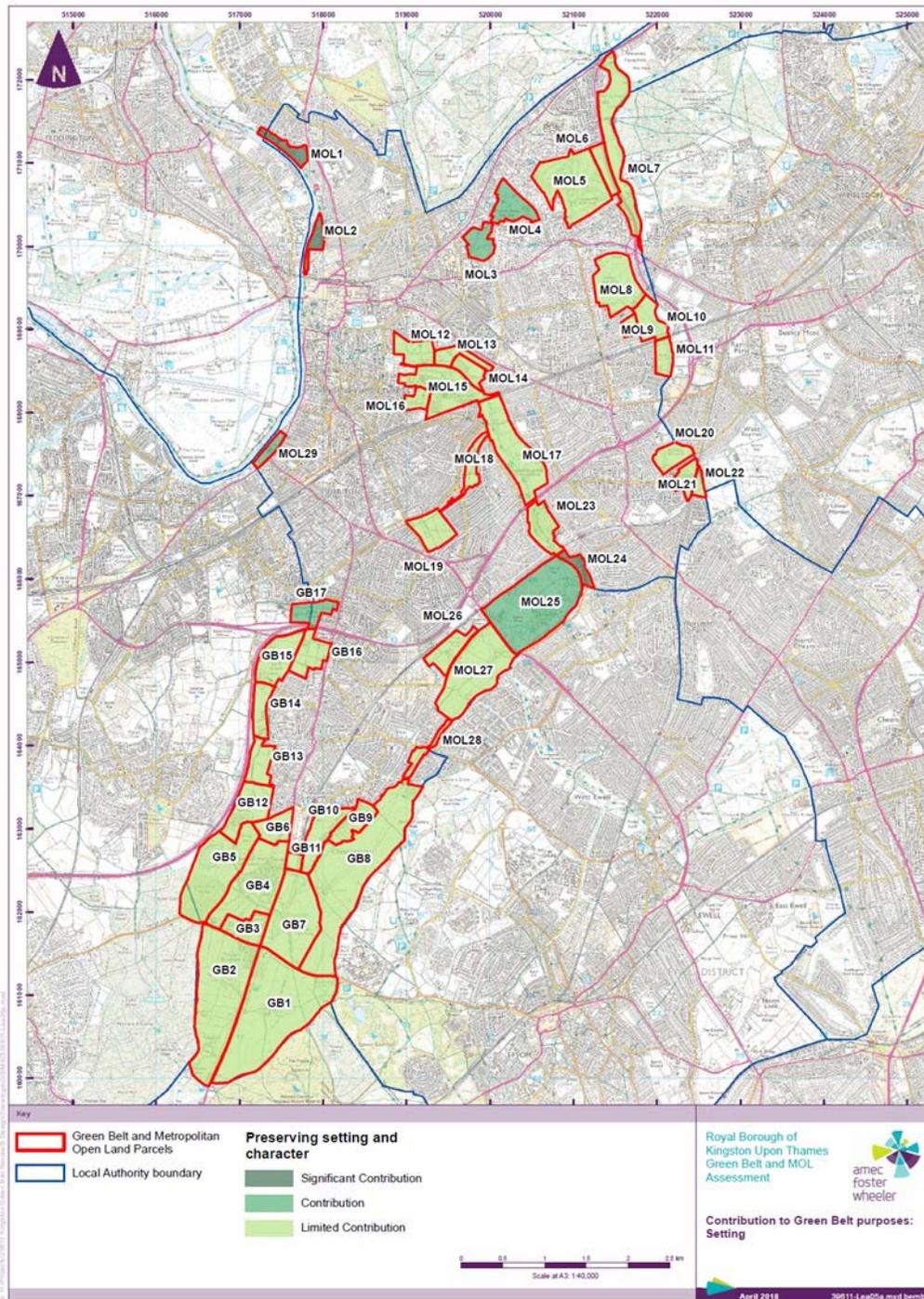
Figure 3.5 Contribution to Safeguarding the Countryside from Encroachment



Preserving the setting and character of historic towns

26. For only one parcel (GB17) has a strategic Green Belt role in respect of this purpose been identified, and in this case the contribution is not significant and is principally related to the setting for a Conservation Area. Locally in respect of MOL, this role is more frequently found, and is significant in certain localities. For example in the case MOL1 and MOL2, which are both adjacent to the River Thames, the preservation of setting and character is most important, substantiated by meeting of MOL criteria in respect of the protection of assets of Metropolitan significance.

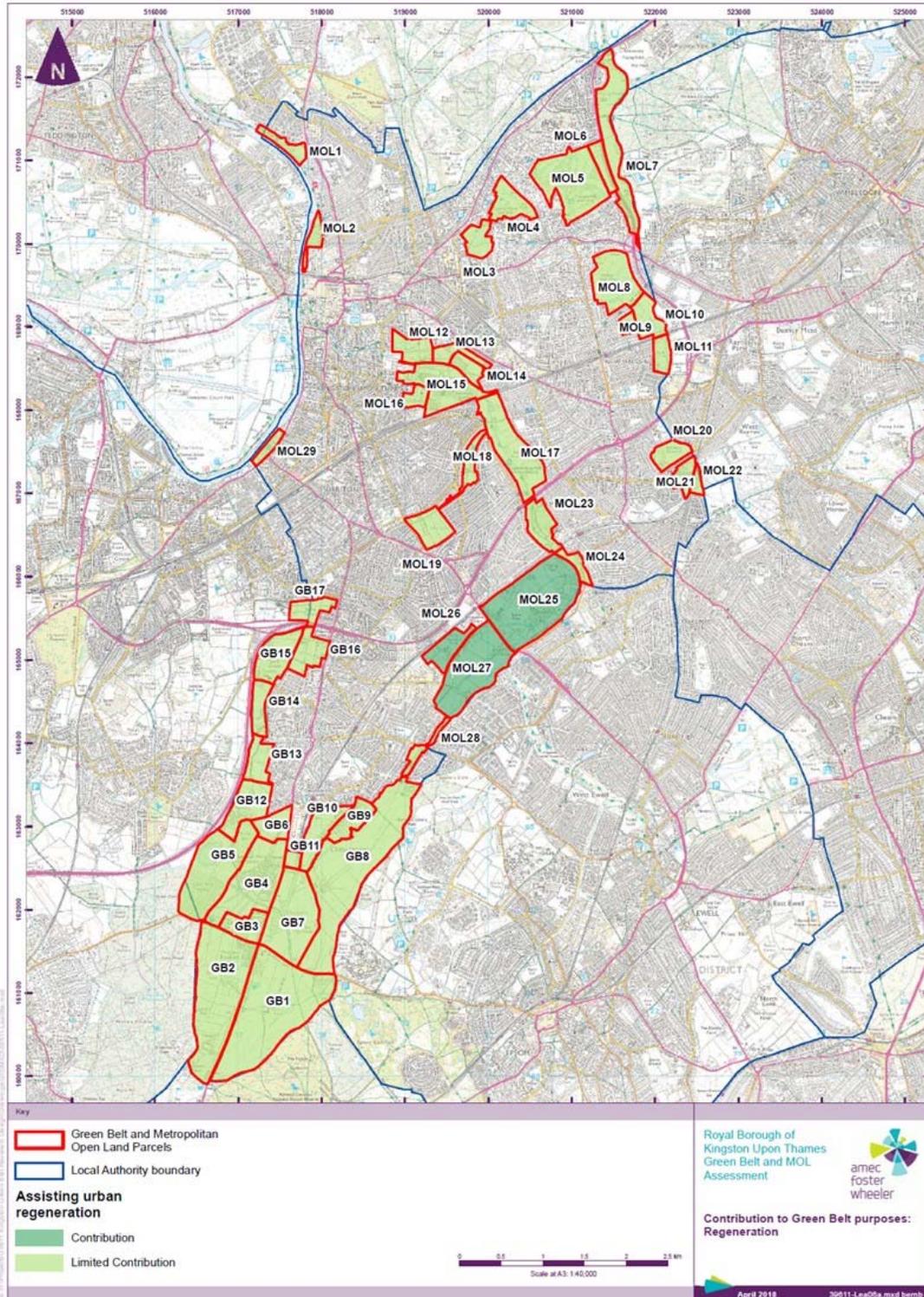
Figure 3.6 Contribution to Setting



Assisting in urban regeneration

27. A small number of parcels of MOL in the vicinity of Tolworth have been identified as potentially making a contribution to this purpose, although the precise connection is difficult to establish. For the wider Green Belt, again there could be a contribution but this is likely to be generalised.

Figure 3.7 Contribution to Urban Regeneration



3.5 Analysis by Metropolitan Open Land Criteria

Overview

28. Assessment of MOL against the criteria set by the London Plan (Policy 7.17) reveals that all parcels of MOL fulfill at least one criteria, with the majority fulfilling three or four. As such they all make a contribution or significant contribution at the scale of the strategic parcel. As with Green Belt, some parcels have complex internal divisions and land uses, and it follows that not all parts of the parcels will necessarily make a similar contribution. Overall, many parcels are assessed as performing multiple roles which together enhances their overall contribution to MOL criteria. The assessment of Green Belt parcels against MOL criteria reveals that more significant contributions are typically related to the presence of biodiversity and/or recreational resources which are deemed to be of Metropolitan significance.

Contributes to the physical structure of London by being clearly distinguishable from the built-up area

29. The majority of parcels (Figure 3.8) make at least a contribution to this purpose, often by virtue of their role as part of the either the Hogsmill River and Beverley Brook, in turn recognised as Strategic Corridors in the All London Green Grid. Equally, some parcels are of a sufficient scale to be a significant part of the structure and character of a locality, thereby assuming strategic significance. Parcels MOL9 (Alric Avenue Allotments), MOL18 & MOL19 (Hogsmill River Park and Alexandra Park), and MOL20 & MOL21 (sports fields at Motspur Park) do not contribute directly to a strategic function, but are nevertheless connected to wider MOL which does make such a contribution. Green Belt parcels adjacent to the built-extent of the urban area are considered to make a contribution to the structure of the capital, typically being the start of open countryside from the contiguous built-up area of London.

Includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London

30. This is perhaps the most exacting criterion, and one which many MOL parcels do not meet (Figure 3.9). Equally, the presence of strategic footpaths such as the London Loop which runs along the Hogsmill Valley, for example, means that many parcels make at least a contribution in this respect.

Contains features or landscapes (historic, recreational, biodiversity) of either national or metropolitan value

31. Significant numbers, and parts, of many MOL parcels have designated SINCS, and as noted above are part of Strategic Corridors identified within the All London Green Grid. Together, these constitute a significant resource, both as part of open space within London and its connectivity to land beyond the urban area (Figure 3.10). Many Green Belt parcels make a significant contribution in this respect, reflecting the presence of biodiversity resources which are considered to be of Metropolitan-wide significance.

Forms part of a Green Chain or a link in the network of green infrastructure and meets one of the above criteria.

32. The great majority of MOL parcels are assessed as making at least a contribution to the network of Green Infrastructure (Figure 3.11), being part of a Green Chain and/or identified as part of the All London Green Grid. This function is typically complemented by fulfilment of other MOL criteria. In three instances (MOL9 [Alric Avenue Allotments, New Malden], MOL20 [Athletic Ground off Motspur Park] and MOL21 [disused sports fields off Motspur Park]), the land is part of a Green Chain but does not meet another criteria. However, in the case of

MOL9, the land is clearly related to the wider MOL10 and MOL8, both of which make a significant contribution to MOL criteria. In the case of MOL20 and MOL21, these are part of wider land to the east at West Barnes (Morden Cemetery and playing fields).

Figure 3.8 Contributes to the Physical Structure of London, distinguishable from the built-up area

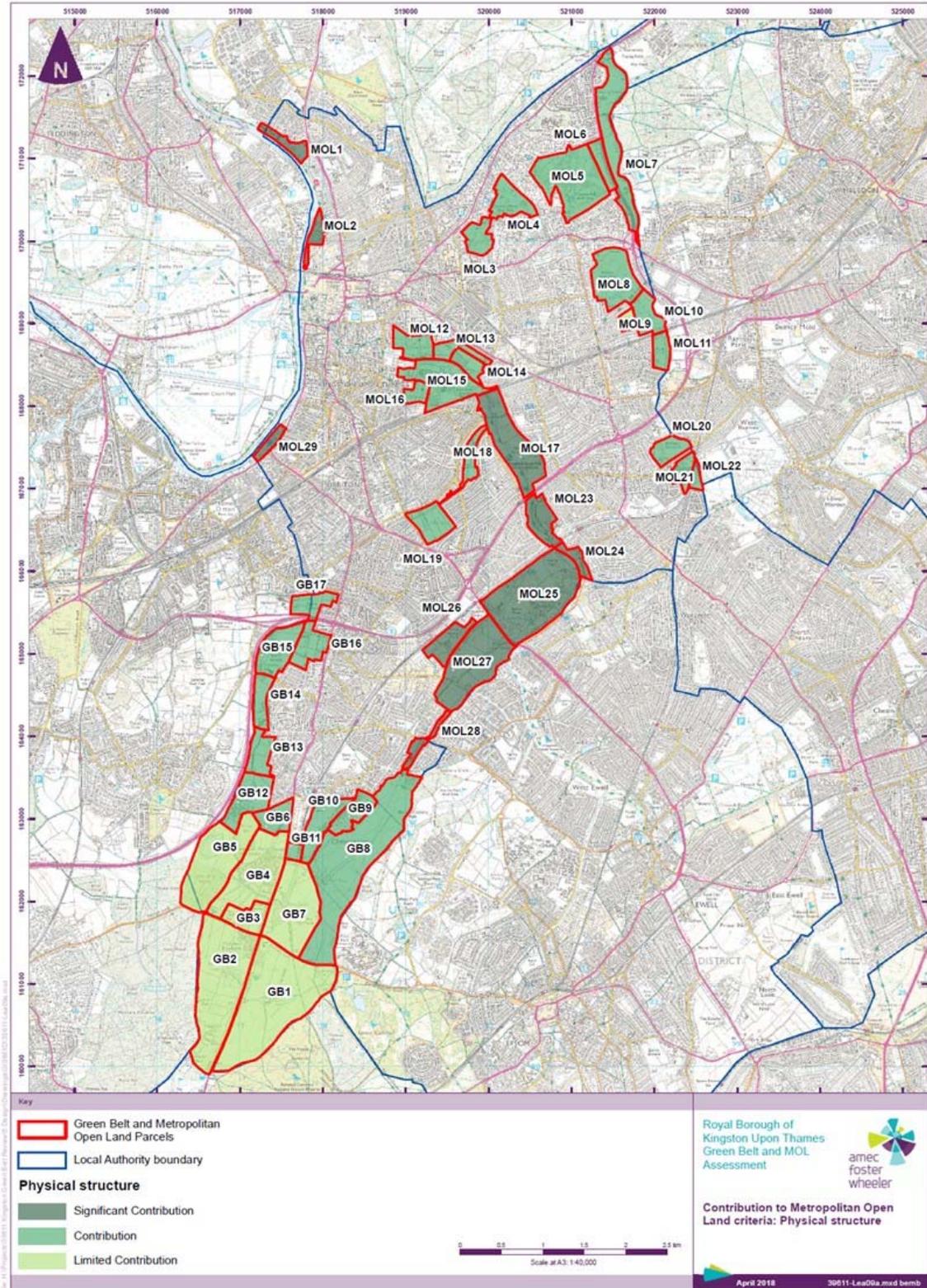


Figure 3.9 Includes open air facilities which serve either the whole or significant parts of London

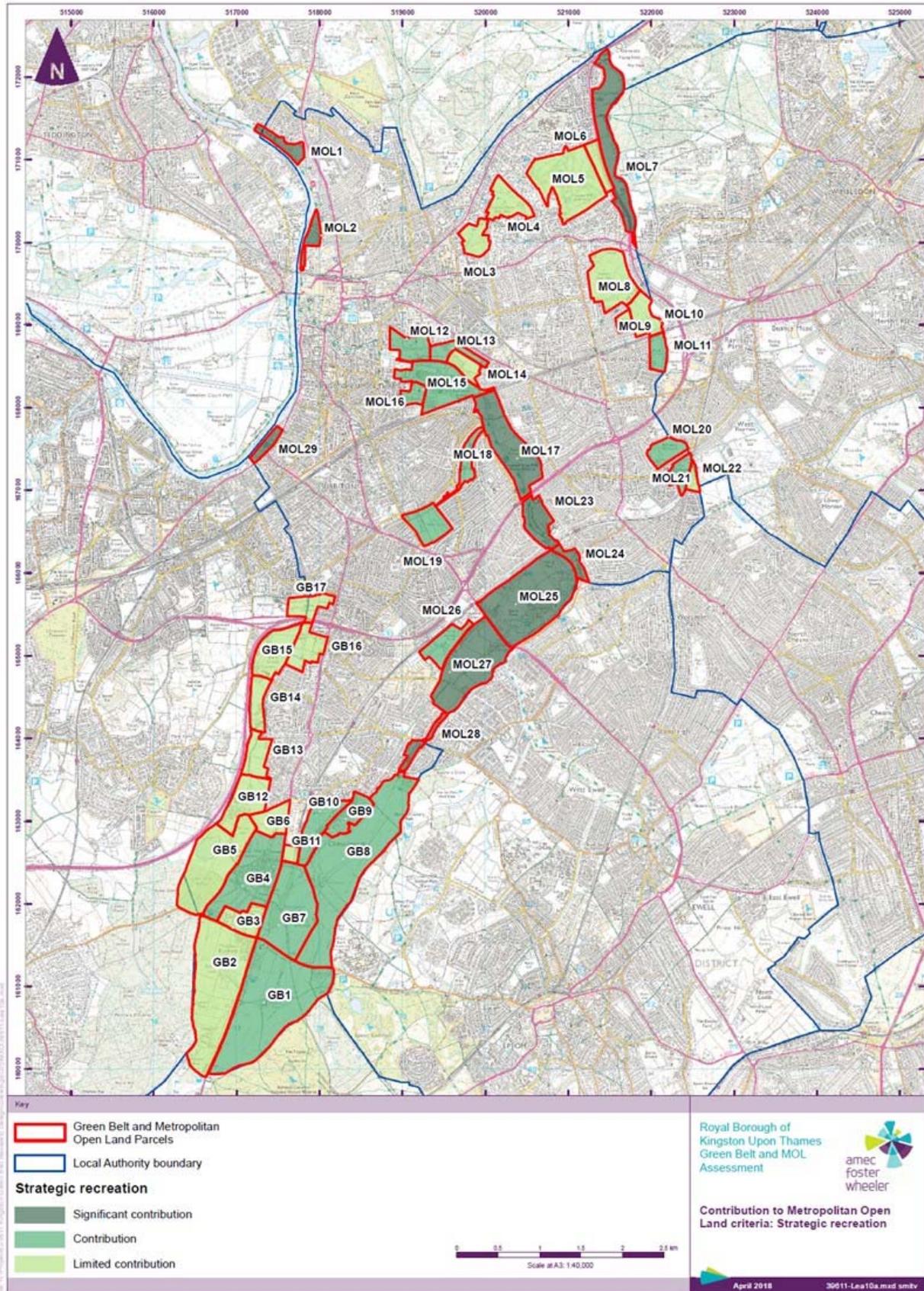


Figure 3.10 Contains features or landscapes of national or metropolitan value

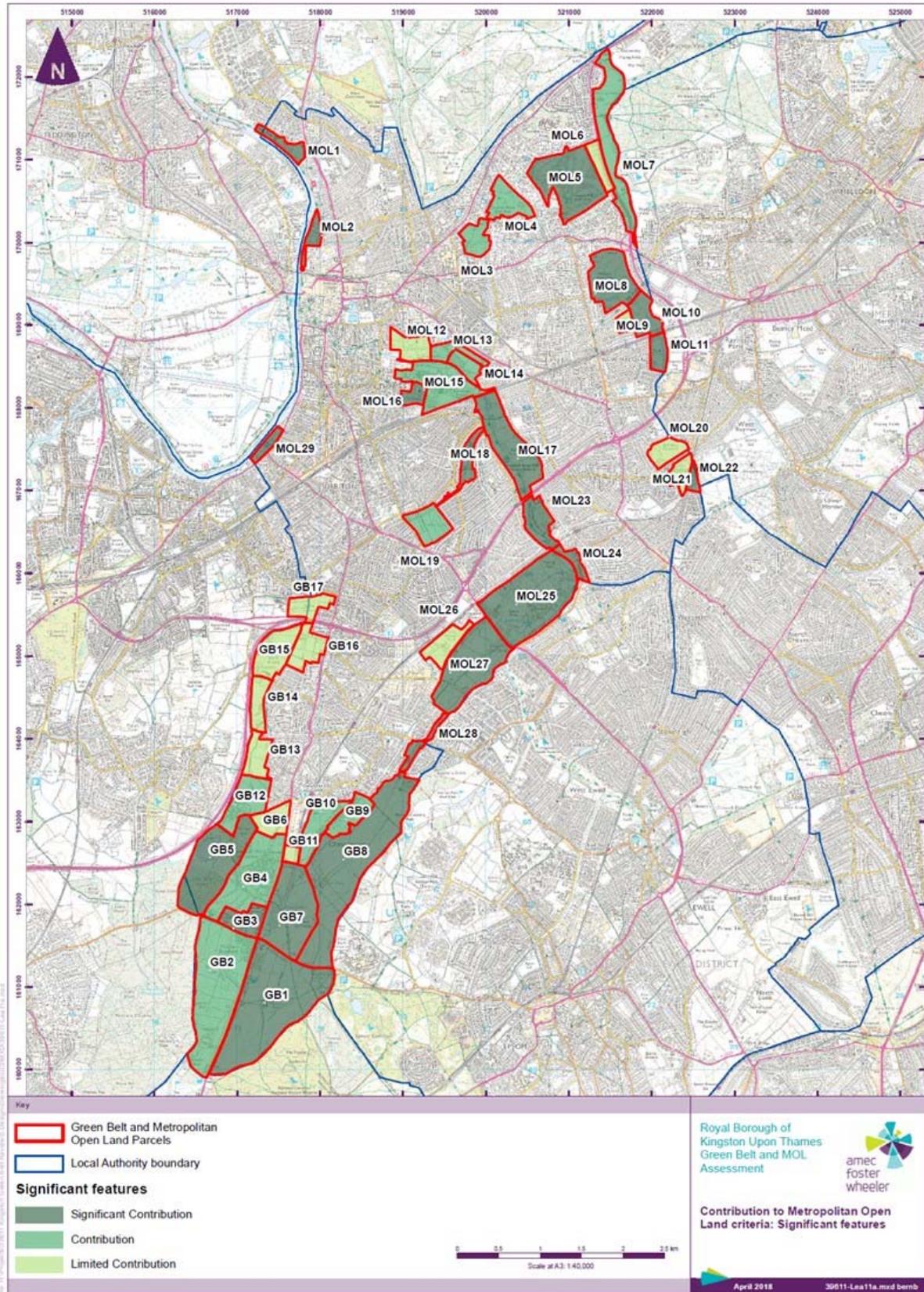
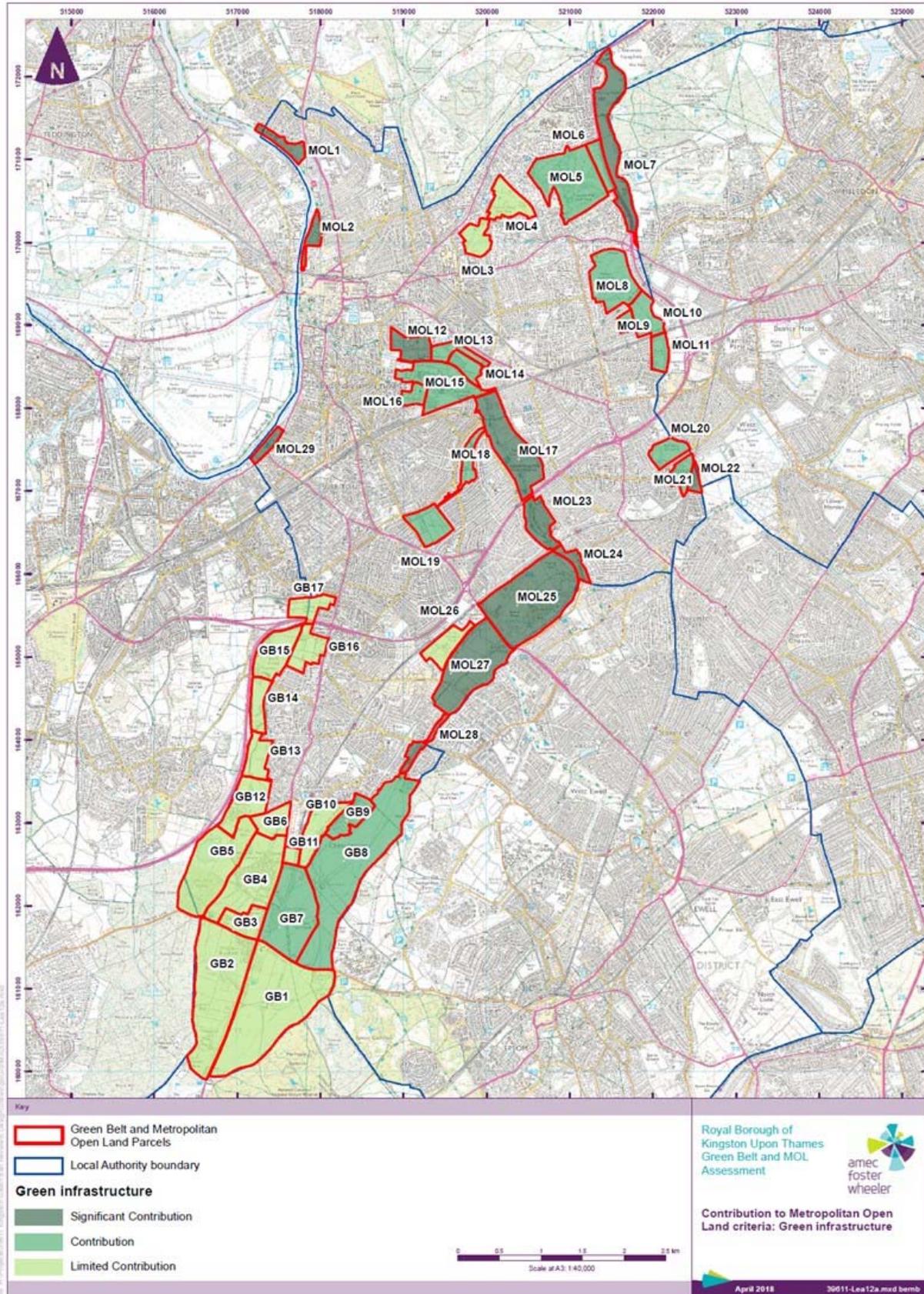


Figure 3.11 Forms part of a Green Chain or a link in the network of green infrastructure



3.6 Comparative Assessment of the Results of Adjoining Green Belt Studies

33. The outputs from Green Belt Reviews in two adjacent authorities – Elmbridge and Epsom and Ewell – are set out in Appendix B. The areas of common interest relate to:
- land adjoining Elmbridge Council, land to the north of A309 (containing Parcel GB17) and land between the A3 and the built edge of Hook and to the edge of Malden Rushett (Parcels GB3 to GB6 and Parcels GB12 to GB16).
 - land adjoining Epsom and Ewell Council, land between Horton Country Park and Chessington (Parcel GB8 and the eastern edge of Parcel GB1).
34. Parcel GB17 was assessed in the context of a wider parcel of land extending between Long Ditton and Hinchley Wood (Local Area 58 in the Elmbridge Review). The parcel as a whole was recommended for further attention in respect of holding potential for development, as follows:
- “Local Area 58 scores weakly across all purposes. The parcel is enclosed within the large built-up area of Greater London, with the Kingston bypass (A309) severing it from the wider Green Belt to the south, thus it contributes very weakly to Purpose 1. With regards to Purpose 2, the parcel makes only a very limited contribution to the overall gap between Long Ditton (part of the Greater London built-up area) and Claygate, with little risk that development would cause physical or visual coalescence of the settlements. The A309 to the south diminishes this role further. The Local Area meets Purpose 3 weakly as a result of its fragmented and piecemeal configuration and previous encroachment. Local Area 58 is part of Strategic Area A. The key role of this Strategic Area is to check the sprawl of Greater London and prevent the coalescence of London with neighbouring towns. It is not felt that this Local Area contributes to either of these purposes strategically and sits as a standalone parcel of land, severed from the wider Green Belt to the south which meets these purposes strongly. The Local Area has already suffered encroachment and is disconnected from the wider countryside. Thus, in line with the overall sensitivity of this Strategic Area to change, there is a sense that change could be accommodated without causing any further harm to the wider integrity of the Green Belt.”*
35. The Assessment of Parcel GB17 noted the physically constrained character of the land, set between the A3/A309 corridor and the urban edge at Southborough, but concluded that the land retains some qualities of open countryside and plays a role in containing the urban edge, being part of the inner edge of the Metropolitan Green Belt. Locally, the land was noted as making a contribution to local character as part of the context for the Southborough Conservation Area. Should Parcel GB17 become isolated as a result of the removal of Green Belt designation on land to the west, the land would be unlikely to continue to make a contribution to Green Belt purposes on its own merits.
36. Land the east of the A3 was considered as a single parcel (Local Area 27) and considered to make a median contribution against all purposes, with an overall ‘moderate’ score. This contrasts with the analysis of this Assessment which finds a much stronger role attributable to this land, principally related to the containment of sprawl, but also to the separation of settlements. Whilst the strategic intention of the Elmbridge Review is acknowledged, the complexity of this tract of land is such that the consideration of smaller parcels yields more nuanced results in respect of local geography, not least the matter of sprawl along the A243.
37. Land to the east of Parcel GB8, (Parcels 17, 20 and 23) largely comprising Horton Country Park was assessed as strongly performing against most Green Belt purposes. This accords with the analysis of this Assessment which considers GB8 as making a Significant Contribution in respect of helping to prevent sprawl, but also making a Contribution to the prevention of encroachment and to the separation of settlements.

3.7 Major Developed Sites in the Green Belt and MOL

38. There are two sites allocated in the RBK Core Strategy (2012) – Chessington World of Adventures and the Thames Water Sewage Treatment Works – as Major Developed Sites (MDS) in the Green Belt/MOL. These designations allow for development in keeping with the current use within the defined MDS boundary.
39. The Assessment shows that the parcels⁴ within which the MDS are contained contribute to Green Belt/MOL purposes, although this Contribution is not considered to be significant, reflecting the built-up character of these parcels.
40. The MDS definition reflects national policy that was originally contained in PPG2: Green Belts which was current when the RBK Core Strategy (2012) was being prepared and examined. PPG2 was superseded by the NPPF (2012) which no longer refers to MDS in the Green Belt. Consequently, it is unlikely that the designation can be used in the Council's new Local Plan.
41. In light of this Assessment, the Council will need to consider carefully the importance of the activities on these sites to RBK and more widely, and the implications of applying national and London-wide Green Belt/MOL policy without a MDS designation. Included in such a consideration could be whether Exceptional Circumstances exist to justify the removal of Green Belt/MOL policy from such sites. If Exceptional Circumstances are found to exist, the Council will need to define the precise boundary of these site in the Local Plan.

3.8 Positive Use of the Green Belt and Metropolitan Open Land

42. Green Belts (and equally MOL) are not simply a restrictive policy tool, but hold the potential to enhance environmental quality. In this regard, the NPPF (2012) (para 81) identifies that:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

43. As part of the Green Belt/MOL Assessment no parcels were identified as being so degraded to require specific intervention, although there is evidence of some of the typical negative characteristics associated with the so-called 'urban fringe' which include:
 - ▶ erosion of landscape structure through the removal and decay of field boundaries;
 - ▶ unmanaged hedgerows leading to 'gappy' boundaries;
 - ▶ unmanaged woodland resulting in poor structure and reduced opportunities for healthy succession;
 - ▶ fragmentation of land holdings associated with sale and lease for horse-keeping.
 - ▶ changes in land management associated with land help for 'hope value' leading to scrub encroachment; and
 - ▶ unsympathetic, hard urban edges associated with estate development which abuts open farmland.
44. By no means can all of the urban fringe thus be characterised, but combinations of these factors operate to lesser or greater degrees. These issues have long been nationally recognised and they are the subject of various interventions countrywide through initiatives such as community forestry. These can demonstrate that relatively modest interventions

⁴ Parcel GB4 contains land related to Chessington World of Adventures and parcel MOL15 contains the Thames Water Sewage Treatment Works.

such as tree planting and access improvements can potentially make a significant difference to the quality of the landscape in these areas. On a larger scale, the role of community forestry in particular and its natural fit with Green Belt designation is acknowledged in the NPPF (2012) (para 92).

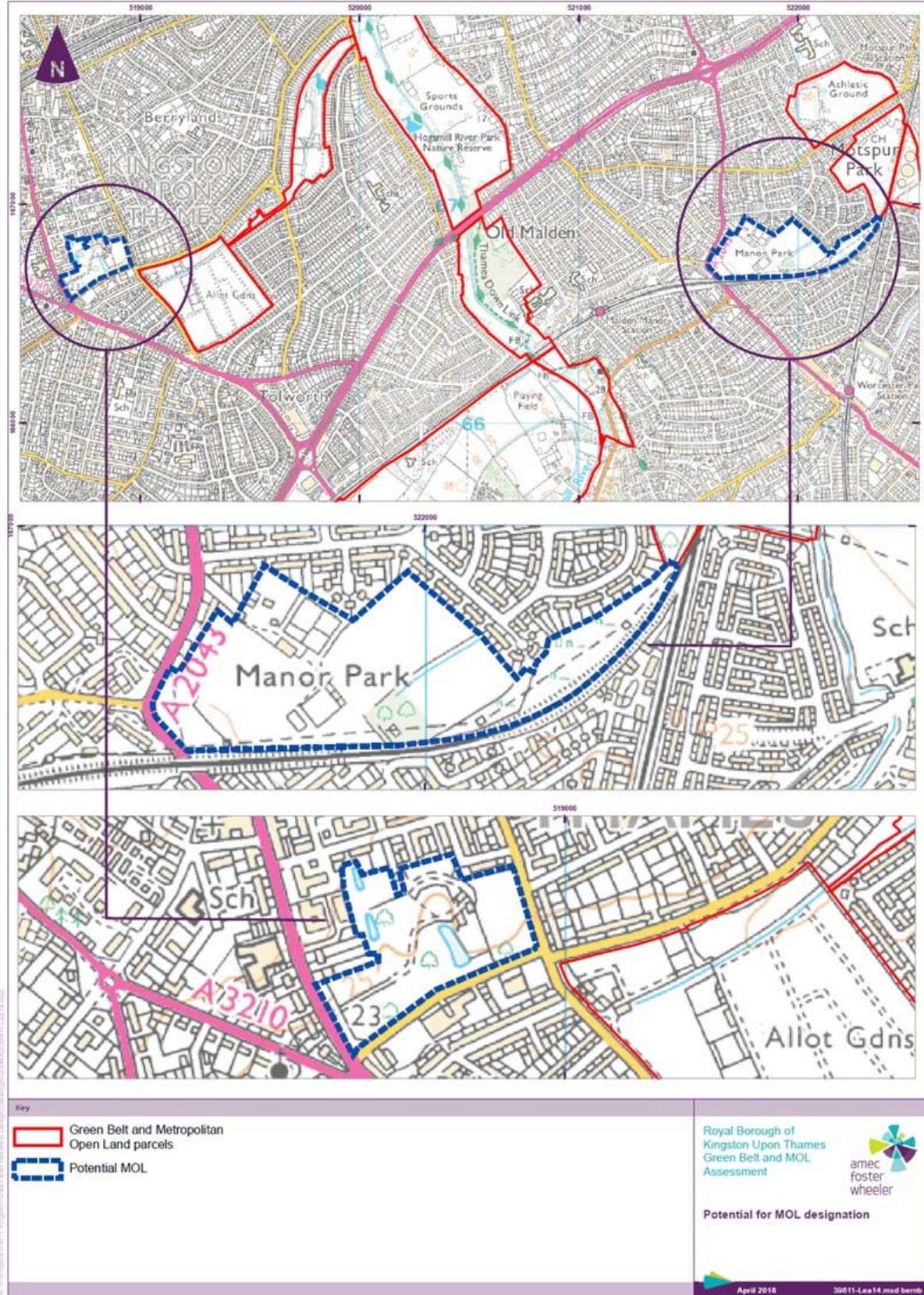
45. Direct intervention to strengthen the landscape character is typically reliant upon new development prompting opportunities to improve recreational opportunities, for example. The progressive erosion of landscape structure and wider changes in land use (for example to horse-keeping) can greatly affect both the appearance of the Green Belt and the sense of openness that be typical of its character. Whilst landscape quality is not a Green Belt criterion, as noted in the NPPF (2012), identifying opportunities for enhancing landscape character of the Green Belt is important. Opportunities include positive land management and/or enhancement of landscape structure, ranging from the provision of recreational and nature conservation opportunities as more comprehensive approaches through to Public Rights of Way enhancement and tree planting as part of selected intervention.
46. An example within RBK of such enhancement opportunities lies in access improvements to the Hogsmill River, notably in the vicinity of the Thames Water Sewage Works where there is currently no access.

3.8 Areas for Consideration for Designation as MOL

47. As part of the assessment process using maps and aerial photography, the following areas were identified as holding potential for consideration for designation as MOL, reflecting their character and geography. These are mapped in Figure 3.12.

Location	Fulfilment of MOL criteria	Additional Rationale
Manor Park, off Malden Road, Motspur Park	SINC	adjacent to Motspur Park
Fishponds, off Ewell Road/Hollyfield Road	SINC, Conservation Area	Adjacent to Alexandra Park

Figure 3.12 Potential areas for designation as MOL



4. Study Conclusions and Justification

1. The Green Belt within RBK fulfils its intended strategic purpose as part of the Metropolitan Green Belt, with many instances of more than one purpose being met.

The Assessment identifies that all parcels make a Contribution to at least one Green Belt purpose, and in many cases multiple purposes. Strategically, a dominant purpose relates to the containment of sprawl where a number of parcels act in combination to restrain the southward and westward spread of the conurbation at Chessington/Hook. Equally, the Green Belt acts to maintain the separation between towns and associated suburbs (i.e. Kingston upon Thames, Claygate, Oxshott, Ewell and Ashted/Leatherhead). More broadly, the Green Belt contributes to the prevention of the wider encroachment of built development in the immediate vicinity of the built edge of the conurbation and the wider open countryside. Notwithstanding the general fulfilment of Green Belt purposes across the Borough, there are examples where the containment of sprawl, in particular, has been less successful.

2. The Green Belt within RBK should be considered in its strategic context, both in terms of its role as part of the inner edge of the Metropolitan Green Belt and its function in combination with Green Belt in adjacent authorities.

As the inner edge of the Metropolitan Green Belt, the Green Belt within RBK plays a role of particular significance to London as a whole, containing the built edge and maintaining a more or less clear distinction between town and country. Strategically, the Green Belt acts in combination with Green Belt in adjacent authorities to the west, south and east, maintaining separation between towns and the maintaining the openness of the countryside generally. In these regards, the purposes of Green Belt policy have broadly been fulfilled, with some localised exceptions, including notably significant built development at Chessington World of Adventures.

3. The criteria set for Metropolitan Open Land by the London Plan are fulfilled to varying degrees, with notable contributions as assets of London-wide importance.

The geography and roles of MOL within the Borough is complex but to varying degrees the land serves the purposes identified in the London Plan. MOL exhibits a wide diversity of land uses, including examples of extensive built development, notably at the Thames Water Sewage Works at Hogsmill. Together, there are significant areas of MOL which are identified as having significance to London as a whole, comprising the context for strategic river corridors such as the River Thames and the Hogsmill River; both of these corridors are identified within the All London Green Grid as being of recreational and nature conservation importance. Equally, there are wider areas of nature conservation and archaeological importance which, whilst not necessarily being of strategic significance, nevertheless are locally important. It is not untypical for MOL parcels to make a contribution to several criteria individually and when considered together overall make a significant contribution to their fulfilment.

4. There are no instances of the Assessment identifying an overall Limited Contribution to Green Belt purposes or MOL criteria.

Notwithstanding the high degree of variance in both form and function, all Green Belt and MOL parcels were found in the Assessment to make at least a Contribution overall to the purposes (Green Belt) or criteria (MOL) set for them. As such, all parcels were found to warrant their designation to greater or lesser degrees, with the relative strength of contribution often (but not exclusively) reflecting a particular role.

5. There are opportunities for positive land management, particularly in urban fringe areas, which

would help to strengthen and restore landscape character.

Whilst no significant evidence of the abandonment or degradation of land was encountered in the Assessment, there are various land management interventions which could help to reinforce landscape character and condition. These include the substantiation of landscape elements such as hedgerows, tree planting and the management of unauthorised land uses. In turn, this could help to strengthen the integrity of the Green Belt in particular (compared to MOL, which because of its location and scale, has generally more closely managed land uses).

6. Use of this report

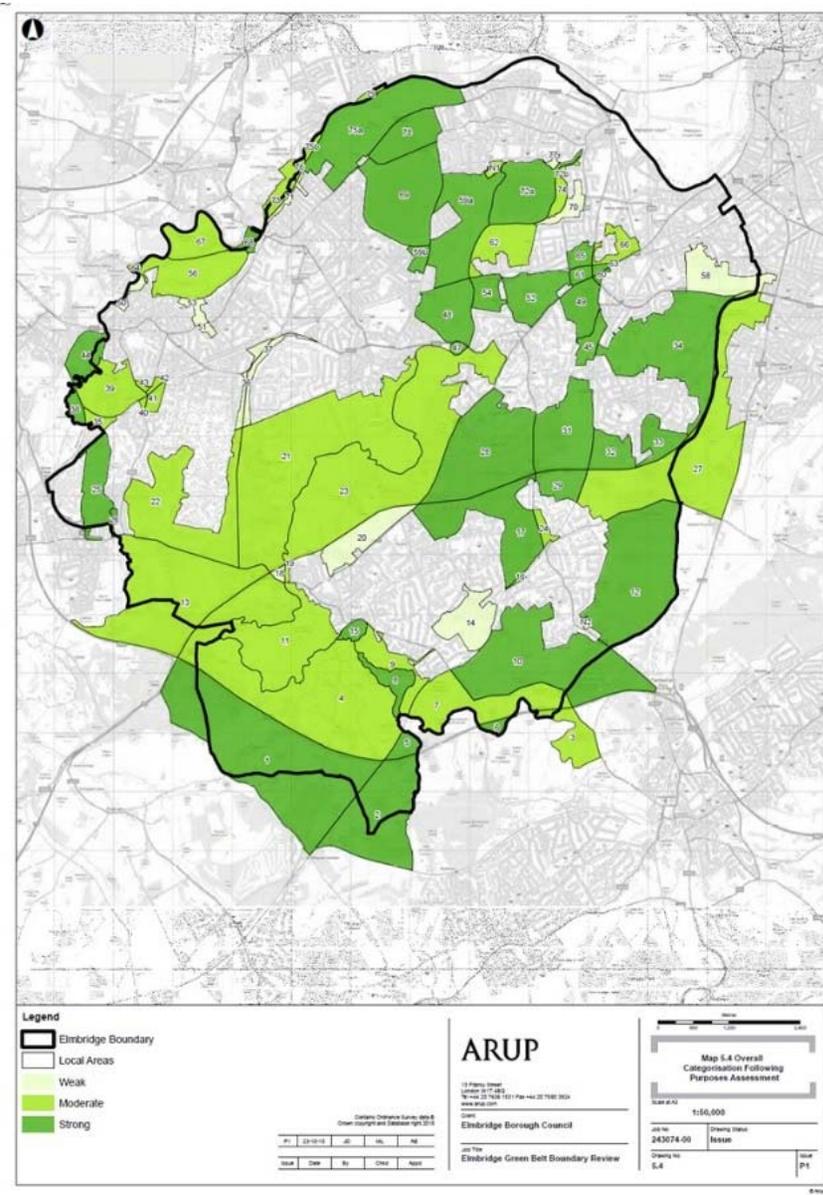
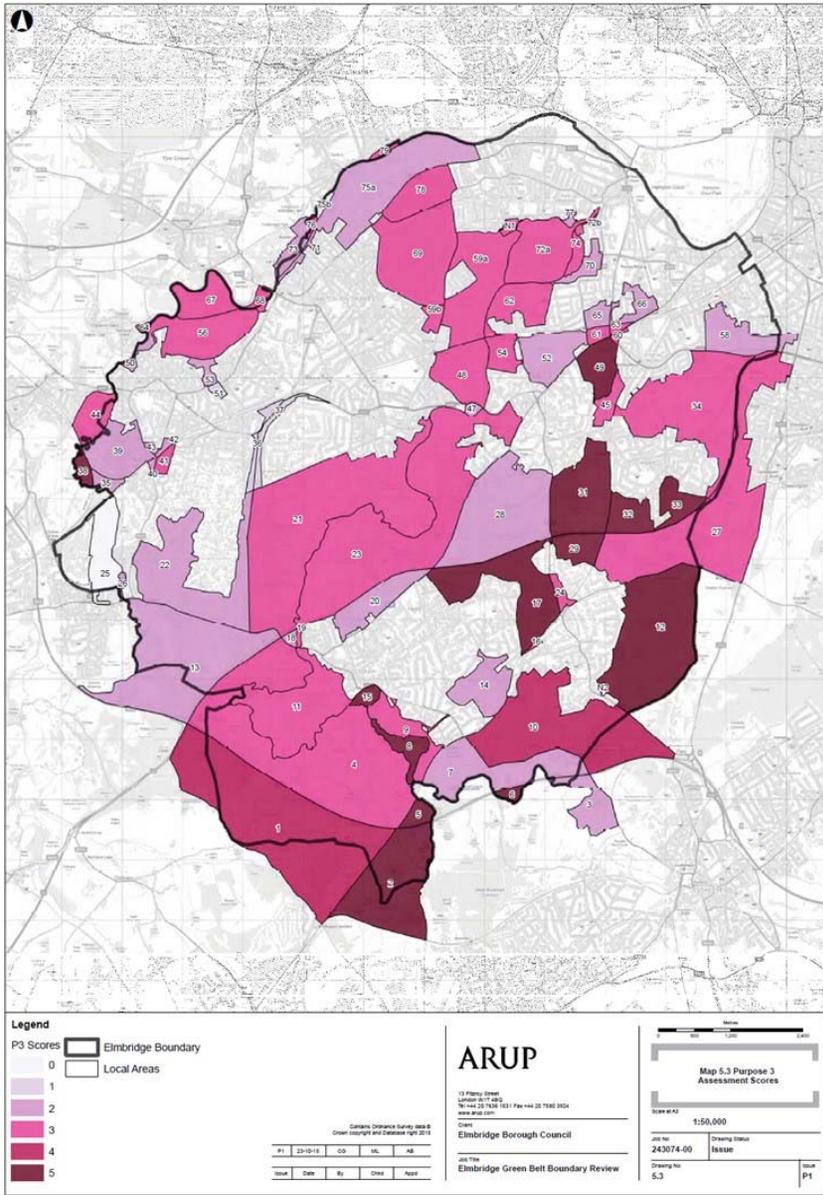
This report is part of the wider evidence base being assembled by RBK as part of the preparation of the Local Plan. As such, the findings and conclusions will be used in conjunction with other evidence studies which together inform decision making. No recommendations are made in the report regarding areas which may or may not hold potential for their status as either Green Belt or MOL to be changed in light of what is termed 'Exceptional Circumstances'. Further detailed work would be required to determine the effects (strategically and locally) of any such proposals.



Appendix A Parcel Assessment

See separate document.







6.1.8 Local Area 58

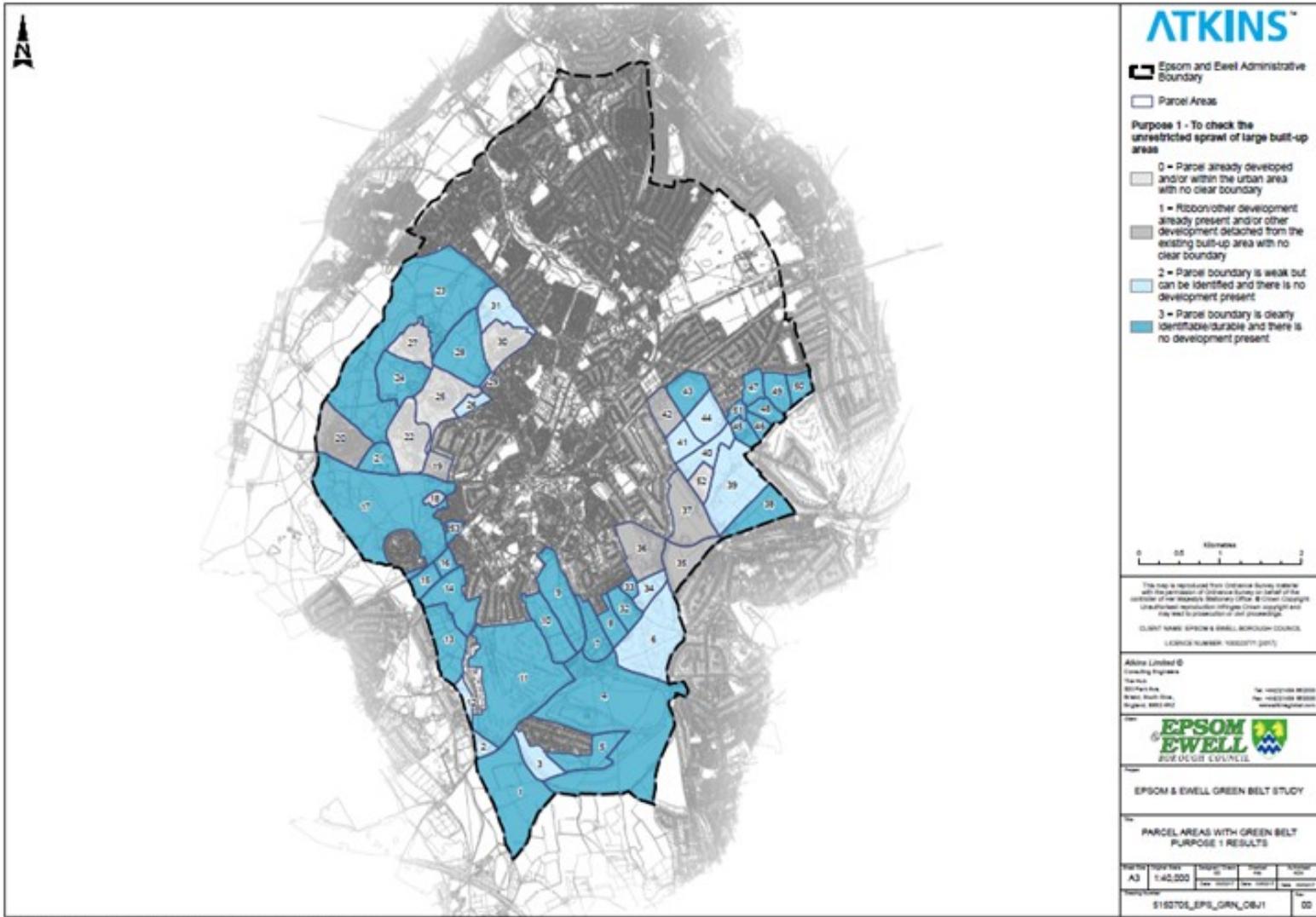
Local Area 58 scores weakly across all purposes. The parcel is enclosed within the large built-up area of Greater London, with the Kingston bypass (A309) severing it from the wider Green Belt to the south, thus it contributes very weakly to Purpose 1. With regards to Purpose 2, the parcel makes only a very limited contribution to the overall gap between Long Ditton (part of the Greater London built-up area) and Claygate, with little risk that development would cause physical or visual coalescence of the settlements. The A309 to the south diminishes this role further. The Local Area meets Purpose 3 weakly as a result of its fragmented and piecemeal configuration and previous encroachment. Local Area 58 is part of Strategic Area A. The key role of this Strategic Area is to check the sprawl of Greater London and prevent the coalescence of London with neighbouring towns. It is not felt that this Local Area contributes to either of these purposes strategically and sits as a standalone parcel of land, severed from the wider Green Belt to the south which meets these purposes strongly. The Local Area has already suffered encroachment and is disconnected from the wider countryside. Thus, in line with the overall sensitivity of this Strategic Area to change, there is a sense that change could be accommodated without causing any further harm to the wider integrity of the Green Belt.

Recommendation: Local Area 58 performs weakly against the NPPF (2012) purposes and could be considered further.

p.67



EPSOM & EWELL



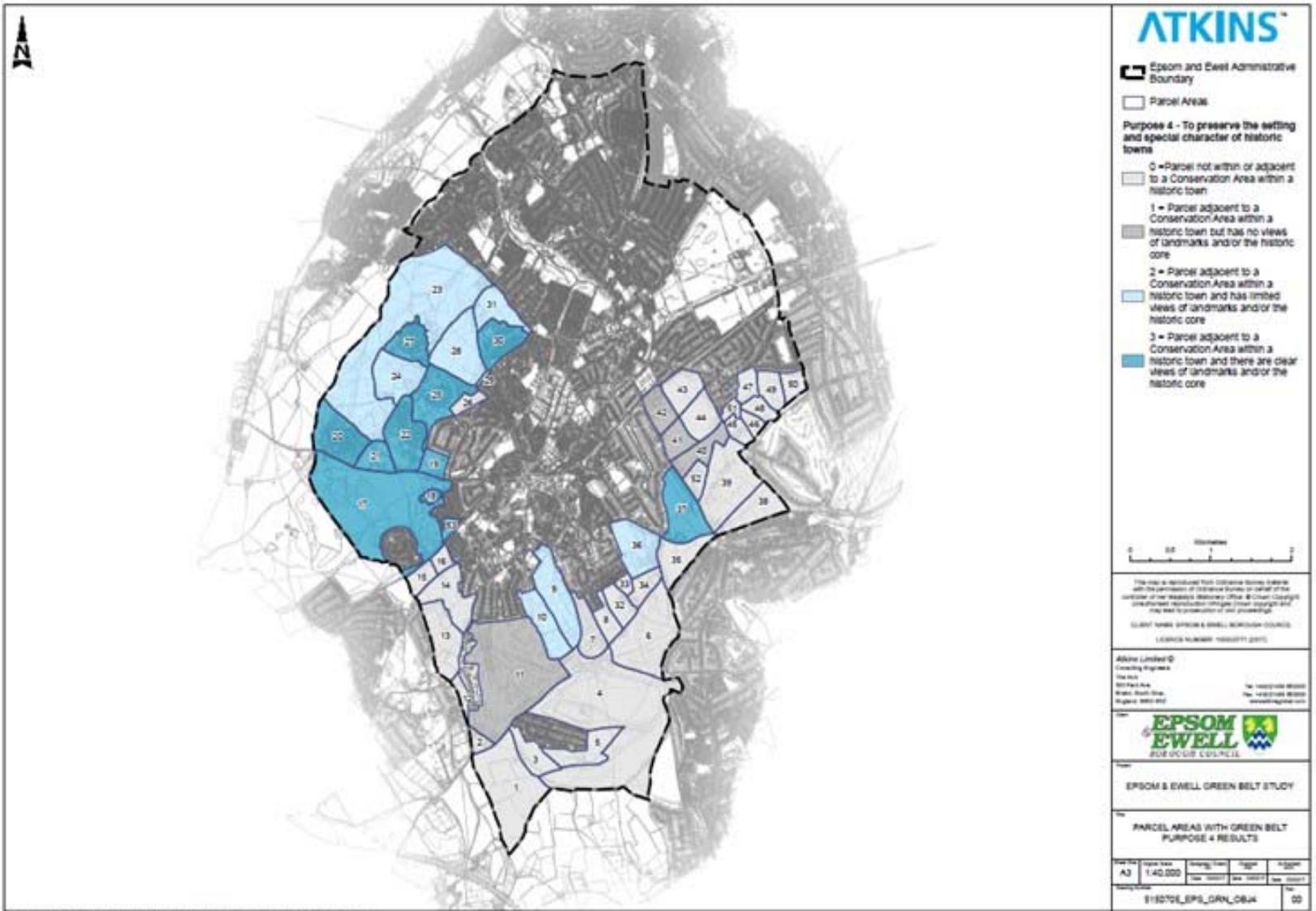






Table 2 - Designated Green Belt Scoring

Parcel ID	Description	Purpose 1 Score	Purpose 2 score	Purpose 3 score	Purpose 4 score	Overall score
P01	Land to the south east of Langley Vale Road	3	1	3	0	7
P02	Land to the south west of RAC Woodcote Park Country Club	2	2	2	0	6
P03	Land to the south west of Langley Vale	2	1	2	0	5
P04	Land at Epsom Downs Racecourse	3	2	2	0	7
P05	Land to the east of Langley Vale	3	2	2	0	7
P06	Land at Epsom Golf Course	2	2	3	0	7
P07	Land between Downs Road and Ashley Road	3	2	2	0	7
P08	Land to the east of Downs Road	3	2	3	0	8
P09	Land between Chalk Lane and Ashley Road	3	2	3	3	11
P10	Land immediately west of Chalk Lane	3	2	3	3	11
P11	Land at RAC Woodcote Park Country Club	3	2	2	1	8
P12	Land to the west of Headley Road	2	3	1	0	6
P13	Land to the east of The Rye	3	3	3	0	9
P14	Land to the south of Dorking Road	3	3	3	0	9
P15	Land to the north of Dorking Road west of Wells Road	3	3	3	0	9
P16	Land to the north of Dorking Road east of Wells Road	3	3	3	0	9
P17	Land at Epsom Common	3	3	3	3	12
P18	Land at Bracken Path and Church Side	0	0	1	3	4
P19	Land to the north of Christ Church Road	1	0	2	3	6
P20	Land at and immediately surrounding West Park former hospital site	1	0	1	3	5
P21	Land to the east of West Park former hospital site	3	3	2	3	11
P22	Land at and immediately surrounding Horton former hospital site	0	0	1	3	4
P23	Land at Horton Country Park and Horton Park Golf Club	3	3	3	2	11

