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# Shaping Elmbridge A New Local Plan

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Green Belt Site Assessment – Explanatory Notes

2021



**Elmbridge**  
Borough Council  
*... bridging the communities ...*

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## Introduction

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- 1.1 The new Local Plan will set out the spatial strategy for the Borough for a 15-year period, to deliver the Council's vision for how our places and communities will grow. It will include Borough-wide strategic and detailed development management policies to deliver sustainable growth. In addition, the Plan will allocate sites for development to meet the identified needs for housing, travellers, employment and open space.
- 1.2 In preparing the Plan, the Council has undertaken a number of evidence-gathering studies to identify the Borough's development needs, and what land is available to meet these needs. The Council has also commissioned reviews of the role and function of the Green Belt.
- 1.3 These explanatory notes have been produced to set out the approach taken to assessing the suitability of development of sites within the Green Belt.

### **Housing need in Elmbridge**

- 1.4 In 2016, the Council published a Strategic Housing Market Assessment which was produced in conjunction with the Royal Borough of Kingston-upon-Thames, Epsom and Ewell Borough Council and Mole Valley District Council. This document set out the objectively-assessed need (OAN) across the Housing Market Area and indicated that Elmbridge had a need for 474 new dwellings per annum.
- 1.5 In 2017, the Government set out proposals for reform in a consultation paper entitled 'Planning for the Right Homes in the Right Places'. Included within this was a new standardised method for calculating housing need, which was adopted in the revisions to the NPPF published in 2019. Following updates to the standard method published in December 2020, the local housing need for Elmbridge is 641 dwellings per annum (9,615 dwellings over a 15-year period (2021 – 2036)).
- 1.6 The Council published a Local Housing Market Assessment in 2020 which focuses on the breakdown of new dwellings by size, affordable housing requirements and housing needs for specific groups.
- 1.7 The Gypsy, Roma and Traveller Accommodation Assessment 2020 provides an assessment of current and future needs for this type of accommodation. It identified a future need for 28 pitches over the plan period.

## **Land availability in Elmbridge**

- 1.8 A Land Availability Assessment (LAA) has been undertaken to inform the preparation of the Local Plan. The LAA sets out the evidence for the supply of land which is suitable, available and achievable for housing, economic development and other uses over the plan period. The LAA is primarily concerned with sites in the urban area. The LAA 2018 informed the development options set out in the Options Consultation in 2019 and has been updated (LAA 2021), to inform the draft Local Plan.
- 1.9 The LAA identifies the potential land supply to meet the Borough's development needs, but it is not the role of that document to consider which of the sites are most aligned with the Council's spatial strategy and which should therefore be allocated.
- 1.10 The LAA is a live document and is subject to change to ensure that the development of the Local Plan is based on the most up-to-date information.

## **Economic development needs in Elmbridge**

- 1.11 A Strategic Employment Land Review (2019) has been undertaken to assess the Borough's existing employment sites and consider their potential to meet the needs of the market and deliver economic growth. It considers not only the performance of existing sites designated as Strategic Employment Land, but also examines a variety of other non-designated sites which may have the potential to become strategically-important locations for employment.
- 1.12 Prior to this, the Retail Assessment 2016 assessed future demand for retail floorspace in the Borough up to 2035 and considered the existing and future roles of its town, district and local centres. It concluded that between 15,100sqm and 21,600sqm of net additional retail floorspace would be required within the centres.
- 1.13 The Commercial Property Market Study (2017) identified a need for an additional 58,000 sqm of employment floorspace to cover the period until 2035, totaling 16ha. Most of the need (9ha) is for office space, with around 7ha needed for warehousing and distribution.
- 1.14 The more recent Local Market Appraisal (2020) relies on current employment forecast data to test the predictions made in the 2017 Study and concludes that the 58,000 sqm need may be an over-calculation over the long-term. Current demand for office space is not particularly strong, but industrial spaces are very much in demand. It is concluded that the Council will need to make a concerted effort to protect the existing stock and identify more sites for this type of use. The Appraisal also concludes that the amount of retail floorspace identified as required in 2016 should be reduced by around 20-30% for comparison goods, and 5 to 10% for convenience goods.

## **Assessment of Elmbridge's existing Green Belt**

- 1.15 The Council commissioned a review of the performance of the Borough's existing Green Belt against the purposes of designating such land as set out in national policy. This work is known as the Green Belt Boundary Review (GBBR).
- 1.16 The first phase of the GBBR (2016) focused firstly on a strategic review of Elmbridge's Green Belt within the wider Metropolitan Green Belt context and secondly, on a local review of identified Green Belt parcels (known as Local Areas) to identify the performance of the Green Belt against the purposes of designation as set out in paragraph 134 of the NPPF. The local areas were judged to be performing either strongly, moderately or weakly against the purposes of designation.
- 1.17 The second phase of the GBBR (2018) split these weakly-performing local areas into sub-areas, so they could be examined in more detail. The sub-areas were considered against the purposes of designation and also to what extent they contribute to the integrity of the wider Green Belt. A number of sub-areas were identified as weakly performing and/or making a less important contribution to the wider strategic Green Belt, and forty-eight areas were recommended for further consideration.
- 1.18 The Review of Absolute Constraints (2016) and subsequent update (2019) identified the constraints which would prevent development occurring, as the resultant impacts could not be mitigated. The 2016 document provided a comprehensive assessment of all of the Local Areas, highlighting those entirely or partially affected by absolute constraints. The 2019 document took into account subsequent amendments to the National Planning Policy Framework to include Ancient and Veteran Trees and updates to flood risk mapping.
- 1.19 The Green Belt Accessibility Assessment (2019) considered the accessibility of the weakly performing Local Areas and all of the Sub-Areas, as well as sites promoted by landowners. The document looks at the proximity of the land parcels to major service and employment centres, public transport hubs and a range of more local facilities and services.
- 1.20 The Assessment of Weakly Performing Local Areas (2019) reviewed the twelve land parcels identified in the first phase of the GBBR (2016) and considered their development potential. Three of these Local Areas had previously been identified as Key Strategic Areas, with the potential to accommodate large-scale development. Of the remaining nine weakly-performing local areas, the Assessment found that five had a developable area with the potential to accommodate small-scale development. Four had no development potential at all.
- 1.21 The review of Green Belt Previously Developed Land (2019) sought to ascertain the existence of any such land on the twelve weakly-performing Local Areas identified within the 2016 work, and all of the Sub-Areas identified

within the 2018 work. It did not attempt to quantify the extent of previously-developed land within these parcels, but simply whether or not any existed.

- 1.22 The Minor Boundary Amendments document (2019) comprised a detailed review of the Green Belt boundaries with the adjoining built-up area across the whole Borough, to consider minor amendments to make the boundary more logical or defensible. In total, 83 minor amendments are recommended.

### **Purpose and structure of this report**

- 1.23 It is clear from the most recent published LAA, and the emerging assessment, that there will be insufficient land coming forward within the Borough's urban areas to meet its development needs over the plan period. As such, and providing that the exceptional circumstances required by paragraph 136 of the NPPF can be demonstrated, sites in the Green Belt could be considered for allocation in the emerging Local Plan.
- 1.24 It is important that a consistent, robust and objective approach is used to identify possible sites to be released from the Green Belt and for consideration for allocation in the Local Plan. Any proposed allocation would be subject to whether the Council concludes that there are the exceptional circumstances, in accordance with national planning policy, to justify any amendments to the Green Belt boundary. A consideration of exceptional circumstances at the borough-wide scale has been undertaken separately. Exceptional circumstances on a site-specific basis are considered in this methodology.
- 1.25 This site assessment methodology has been developed using the advice within the NPPF and the National Planning Practice Guidance on Strategic Housing and Economic Land Availability Assessments, as well as best-practice examples from other local planning authorities.

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# Planning Policy Context

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## National Planning Policy Framework 2021

- 2.1 The National Planning Policy Framework (NPPF) (2021) reinforces the Government's objective to significantly boost the supply of homes in England. The NPPF requires that, as a minimum, Local Plans should provide for an area's housing and other development needs, as well as any that cannot be met within neighbouring areas, where it is practical to do so and is consistent with achieving sustainable development.
- 2.2 Using the evidence gathered during the preparation of the Plan, local planning authorities are directed to ensure that they meet their full development needs, including identifying key strategic sites which are critical to the delivery of the strategy. In determining the minimum number of homes needed, the plan should be based upon a local housing need assessment. The NPPF requires that this should be "conducted using the standard method in national planning guidance" (paragraph 61).
- 2.3 Paragraph 22 advises that policies should seek anticipate and respond to long-term opportunities and requirements, by planning for a minimum period of fifteen years from the date of adoption. Paragraph 20 sets out of the types of development that must be planned for, which can be summarised as housing, commercial, infrastructure, community facilities and conservation of the environment. Paragraph 35 sets out the tests for soundness, and requires that the strategy should take into account reasonable alternatives and be based on evidence.
- 2.4 Paragraph 11 of the NPPF states that:
- a) "Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
  - b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
    - i. The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
    - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of this Framework taken as a whole."
- 2.5 Green Belt policy is identified within footnote 6 of the NPPF as a specific policy which indicates that development should be restricted.

Paragraph 137 sets out the national policy in relation to Green Belt. “The Government attaches great importance to the Green Belt. The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. As such the essential characteristics of Green Belts are their openness and their permanence’.

Green Belt serves the following five purposes:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbouring towns from 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.

Green Belt is therefore a policy designation intended to keep land free from development. There is a common public misconception that Green Belt land is ‘sacrosanct’ and that once designated it should never be developed. This has never, however, been the case in legislative or policy terms.

National policy is very clear that when a planning application is submitted on Green Belt land, the applicant must demonstrate ‘very special circumstances’ exist in order to justify harm to the Green Belt. National Planning Practice Guidance (PPG) states that housing need alone is unlikely to represent these ‘very special circumstances’.

However, a different test applies when determining whether to adjust Green Belt boundaries through a Local Plan – in particular the process of plan-making requires a more strategic and longer term assessment and then judgement to be made. Paragraph 136 of the NPPF states that: *‘Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans’.*

2.6 Paragraphs 139 – 145 of the NPPF set out the policies which must be considered if a Local Planning Authority needs to amend or review their Green Belt boundaries.

2.7 Specifically, paragraphs 139-140 establish criteria that should be satisfied before exceptional circumstances to change Green Belt boundaries can be said to exist. There is a requirement to fully examine “all reasonable options” for meeting identified development needs before releasing Green Belt. This will be assessed through the examination of the plan, considering whether the proposed strategy

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;

- b) Optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development as demonstrated through the Statement of Common Ground.

2.8 The NPPF requires that when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be considered (paragraph 142). Furthermore, the paragraph states that ‘where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and / or is well-served by public transport’.

2.9 Finally, paragraph 145 states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.

2.10 Site selection (and indeed plan-preparation, more broadly) must also take into account the guidance of the NPPF in relation to the following matters:

- Sustainable locations – local planning authorities should take an integrated approach to considering the location of housing, economic uses and community facilities and services (paragraph 93e), and ensure a mix of uses to minimise the number and length of journeys undertaken (paragraph 106a). Significant development should be focused on locations which are, or can be made sustainable (paragraph 105) and sustainable modes of travel should be promoted to limit future car use (paragraph 124c), including the provision for attractive walking and cycling networks and supporting facilities (paragraph 106d)
- Land – planning policies should give weight to the use of suitable brownfield land within settlements for residential and other types of development (paragraph 120c) and should allocate land of the lowest environmental and amenity value for development (paragraph 175). Plans should meet identified needs in a way that makes the maximum use of previously-developed land (paragraph 119). Where it is necessary to develop agricultural land, sites with poorer quality soils should be preferred (footnote 58). Policies should support the remediation of degraded or contaminated land (paragraph 174f).

- Open space – local planning authorities should plan positively for the provision and use of open space (paragraph 93a), and base policies on robust assessment of the need for open space, sporting and recreational facilities (paragraph 98). Existing open space, sports and recreational facilities should not be built on unless a limited set of circumstances apply (paragraph 99). There is a presumption against development on areas designated as Local Green Space, unless compliant with policies used to regulate development in the Green Belt.
- Climate change – policies should address climate change mitigation and adaptation (paragraph 20d), ensuring the future resilience of communities and infrastructure (paragraph 153) and taking care to site new development away from areas vulnerable to the impacts of climate change where possible (paragraph 154a). Locations which can assist with the reduction of greenhouse gas emissions should be supported (paragraph 154b)
- Biodiversity and habitats – planning policies should protect sites of biodiversity value (paragraph 174a) and minimise the impact on, and provide net gains for, biodiversity (paragraph 174d). Footnote 6 includes specific designations and ‘irreplaceable habitats’ as assets of particular importance which may provide a strong reason for restricting the overall scale, type or distribution of development.
- Flood risk – planning policies should make provision for infrastructure to mitigate flood risk (paragraph 20b) and recognise that undeveloped land can perform a flood risk mitigation function (paragraph 120b). Development should be directed away from areas at the highest risk of flooding, taking into account future increases in risk (paragraph 159). The cumulative impacts of development on flood risk must also be considered (paragraph 160). A risk-based approach, using the sequential test and, if necessary, the exception test should be applied (paragraph 161).
- The environment – development should minimise pollution (paragraph 8c). Development should not contribute to, or be at risk of being affected by, soil, air, water or noise pollution or land instability (paragraph 174e). Opportunities to improve air quality and mitigate existing impacts should be identified at the plan-making stage (paragraph 186), and policies should limit the impact of noise and light pollution (paragraph 185).
- Heritage – the conservation and enjoyment of the historic environment should be planned for (paragraph 190), taking into account the desirability of sustaining and enhancing heritage significance, and the wider benefits that conservation of the historic environment can bring. Great weight should be given to the conservation of heritage assets (paragraph 199)

and any harm to its significance must be supported by a clear and convincing justification (paragraph 200).

- Minerals – Mineral Safeguarding Areas should be defined (paragraph 210c) and policies adopted to ensure that these finite resources are not sterilised by other types of development.

## **National Planning Policy for Waste**

2.11 This document sets out the Government’s detailed waste planning policies, and requires that all local planning authorities pay regard to it to the extent that their responsibilities encompass waste management. Waste planning is the responsibility of Surrey County Council, which has recently adopted the Surrey Waste Local Plan 2020. In the Plan, three sites within Elmbridge (of which, one is in the Green Belt) have been identified for waste-related development.

## **Planning Practice Guidance**

2.12 The Planning Practice Guidance (PPG) supports the policies set out in the NPPF and provides additional detail to aid with their interpretation and implementation.

2.13 The section of the PPG which deals with Plan-making advises that local planning authorities are expected to have a clear understanding of housing needs in their area, as well as business requirements, in order to prepare policies for residential and employment-related development respectively.

2.14 The section on Housing & Economic Land Availability Assessment advises local planning authorities on ensuring a supply of suitable, available and achievable sites for delivery over the plan period. Assessments should “identify sites and broad locations with potential for development; assess their development potential; and assess their suitability for development and the likelihood of development coming forward.”

2.14 The most recent LAA (2021) has been produced in accordance with the method articulated by the PPG. The process for conducting Stages 1 and 2 of the preparation of the LAA has informed the production of this site assessment methodology.

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## Stage 1 - identification of sites for assessment

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- 3.1 The geographical area covered by this site assessment methodology is land located within the administrative boundary of Elmbridge.

### Sources of sites

Sites have been identified from the following sources:

- Call for sites exercises in 2017, 2018 and 2019
  - Regulation 18 consultations
  - Green Belt Boundary Review
- 3.2 Sites for assessment were initially identified from the Call for Sites exercises and Regulation 18 consultations carried out during the Plan preparation period. In addition, since 2015 the Council has welcomed submissions from landowners, agents and interested parties on a rolling basis.
- 3.3 Anyone wishing to submit a site for consideration was asked to complete a proforma and attach a site plan. The proforma requested information regarding the site's location and size, ownership, planning history, proposed uses of the site and capacity, constraints and availability. In total, 89 sites within the Green Belt have been promoted for consideration.
- 3.4 Sites for assessment were also identified within the Green Belt Boundary Review documents:
- weakly performing Local Areas identified by the Green Belt Boundary Review (GBBR) 2016 and the GBBR Assessment of Weakly Performing Local Areas 2019; and
  - the sub-areas identified as being of less importance to the wider strategic Green Belt identified within the GBBR Sub-Division Report 2018.
- 3.5 In total, twelve local areas and forty-eight sub-areas were identified by the Green Belt Boundary Review documents for consideration.
- 3.6 It should be noted that there are a number of promoted sites which fall within sub-areas, or the boundaries of which are contiguous with the sub-area boundaries. In these cases, only one proforma has been produced in order to avoid duplication.

## Site assessment thresholds

3.8 In selecting sites which will be subject to assessment, consideration has been given to the amount of development that could be accommodated.

- Housing - only those sites able to support five or more net dwellings have had their development potential assessed, in accordance with the Planning Practice Guidance<sup>1</sup>.
- Gypsy, Roma and Traveller pitches – Potential to accommodate between three and fifteen pitches

For potential Gypsy/Travelling Showpeople sites, three pitches is the minimum number of considered necessary. The average pitch is expected to be capable of accommodating an amenity building, a large trailer and touring caravan, (or two trailers, drying space for clothes, a lockable shed), parking space for two vehicles and a small garden area. Based on local evidence and wider research, an appropriate minimum pitch size is considered to be 500m<sup>2</sup> (0.05 ha).

- Employment land – only those sites with an area greater than 0.25ha, or which were considered able to provide more than 500 square metres of net additional floorspace have had their development potential assessed, in accordance with the with the Planning Practice Guidance<sup>2</sup>.

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<sup>1</sup> Planning Practice Guidance on 'Housing and economic land availability assessment', Paragraph: 009  
Reference ID: 3-009-20190722 dated 22 07 2019

<sup>2</sup> Planning Practice Guidance on 'Housing and economic land availability assessment', Paragraph: 009  
Reference ID: 3-009-20190722 dated 22 07 2019

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## Stage 2 - Initial sift

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- 3.9 Having compiled a list of local areas, sub-areas and sites identified in accordance with the criteria set out in Stage 1, an initial sift of the sites was undertaken.

### Initial assessment of Green Belt integrity

- 3.10 A desktop assessment, using the Council's Geographic Information System (GIS), was undertaken to consider the impact of release on the integrity of the Green Belt. This was a high-level evaluation intended to identify sites which would result in isolated developed areas surrounded by land designated as Green Belt. In addition to the impact of release of these areas on the integrity of the wider Green Belt, such areas were considered unlikely to be sustainably-located and would be less likely to present permanent, defensible boundaries. In total, twenty-nine of the areas under consideration were discounted following this initial assessment.

### Identification of Absolute Constraints

- 3.11 A desktop assessment, using the Council's Geographic Information System (GIS) was undertaken to establish whether or not the site was affected by any absolute constraints, and, if so, the extent of the constraint coverage.
- 3.12 The absolute constraints affecting Elmbridge have been identified based on footnote 6 of the NPPF, which seeks to protect areas or assets of particular importance<sup>3</sup>. These are:
- Flood Zone 3b (1 in 20-year flood outline – undeveloped land)
  - Sites of Special Scientific Interest (SSSIs);
  - Special Protection Areas (SPA) and Ramsar Sites;
  - Suitable Alternative Natural Greenspace (SANG);
  - Registered Parks and Gardens of Special Historic Interest;
  - Lowland Fens;
  - Ancient Woodlands;
  - Ancient and veteran trees; and
  - Registered Town and Village Greens and Commons
- 3.13 Where the entirety of a site was covered by an absolute constraint, it was discounted. Where it was only partially covered, the site progressed to the next stage of assessment except where a new potential access was located within Flood Zone 3b, in which case the site was discounted. This ensured

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<sup>3</sup> Review of Absolute Constraints (2016) and subsequent update (2019) - <https://www.elmbridge.gov.uk/planning/planning-policy/evidence-to-inform-the-new-local-plan/>

that sites are not excluded in their entirety at this stage where alterations to a site boundary could be made to remove absolute constraints, or where areas affected by absolute constraints could be considered for other uses.

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## Stage 3 - information gathering and officer analysis

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- 3.14 The next stage of the site assessment process gathered more detailed information on each site. Following this officers undertook an initial analysis of the sites' suitability for development and contribution towards sustainability principles. A proforma was developed in order to present this work in a coherent, comprehensive and consistent format. A copy of the proforma can be found in appendix x.
- 3.15 The information used to complete the proformas was drawn from the Council's GIS systems, planning history database, other evidence base documents and submissions from land promoters.
- 3.16 The details gathered on each site included the following:

### **A. Site details**

#### **A1. Site information**

Land parcel location details, including the settlement and ward in which it is located, its size and address have been recorded. A map and satellite image have also been provided, for ease of identification. The description of the land parcel provides an overview of existing conditions and notable features, as well as identifying surrounding uses where relevant.

The proforma identifies whether the parcel is presently greenfield or brownfield and whether it is within the built up area, or adjacent to it. A site is considered to be within the built up area if it is surrounded by development on at least three sides. If it is developed on one or two sides, it is considered to be adjacent to the built up area. The existing land use is then identified, with reference to the use class(es) as applicable.

The agricultural land classification of each site has been recorded. Paragraph 175 of the NPPF advises that "Plans should:...allocate land with the least environmental or amenity value, where consistent with other policies in this Framework." Footnote 58 clarifies that "Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality." As such, whilst none of the sites have been discounted based on their agricultural land classification, the best and most versatile agricultural land is to be avoided. Sites falling within Grades 4, 5, urban or non-agricultural would therefore be considered first for development.

A summary of the site's identification within the GBBR documents follows. The local area and sub-area (if applicable) within which the site falls has been identified, together with the judgement made on its overall performance. The performance of the local areas against the purposes was categorised as strong, moderate or weak. For the sub-areas, two judgements were made: the extent to which the area performs against the purposes, and the importance of its contribution to the wider strategic Green Belt.

Land ownership information has been provided to assist with consideration of the site's availability. Where a land parcel is known to fall within multiple ownerships, this is noted, but land ownership has not been actively investigated. Where a land parcel (or part thereof) is known to be in public ownership, the owner and area have been identified.

Where a site has planning history, this has been identified where relevant. Previous applications for householder development (or of a similar scale, for other uses) has been excluded as it is unlikely to be relevant to the future development potential of a site. For some sites with particularly extensive history, it has been necessary to record only the most recent applications and where this has occurred, the cut-off date is shown.

The reason for considering the site concludes the first section of the proforma: whether it has been promoted by the landowner, or whether it was identified in the GBBR for further consideration.

## **A2. Constraints**

Any absolute constraints affecting the sites have been identified, along with the area of the land affected (expressed in both hectares and percentage coverage).

Other constraints, or policy designations to be taken into account, are listed below. Whilst these would not necessarily preclude development coming forward on a particular site; they may affect the nature, extent or location of development. The constraints/designations have been identified using the Council's GIS software. Where only part of the site is covered by a constraint, the affected area is identified. The presence of immovable essential infrastructure, such as gas pipelines and overhead power cables, is also noted in this section where applicable.

## **B. Type and size of development**

### **B1. Potential use of land parcel**

The development potential of each site has been identified and the capacity estimated.

For residential development, the suggested density on which the which the estimated capacity is based is shown. The section has been completed using professional judgement, based on the prevailing pattern of development in the surrounding area, local density policies in the Core Strategy 2011 and the overriding need to make efficient and effective use of land as required by national policy.

Estimations of capacity have also taken into account the presence and extent of constraints affecting the site. This is not necessarily the same quantum of development which would be carried forward into a policy allocating the site for development, as the decision to allocate will take account of a wider range of evidence-base documents and the requirements of infrastructure providers.

For commercial development, the proposed use class and net additional floorspace has been shown where the site has been promoted by the landowner. Where there is insufficient information provided, the proposed floorspace has been left 'unknown'.

Sites which have a potential use which does not fall within one of the categories listed above are identified under 'Other'.

## **B2. Site promotion**

This section of the proforma has been completed only when a site within (or contiguous with) the land parcel under consideration has been promoted by a landowner/developer. The site reference number is given, followed by the details as they were submitted by the landowner/developer in their representations.

## **C. Site suitability considerations**

### **C1. Sustainable location**

The NPPF requires that, at the plan-making stage, opportunities to sustainable modes of transport such as walking, cycling and public transport must be promoted. Paragraph 142 of the NPPF states that "when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account...Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which...is well served by public transport."

As such, there is a need to consider accessibility to public transport facilities, major service and employment centres, as well as range of more local services and facilities. The findings of the GBBR Accessibility Assessment (2019) were used to complete this section of the proforma. The Accessibility Assessment awarded each site one of the following ratings, based on an average score taken across all of the criteria: excellent, good, fair, moderate and limited.

Also recorded in this section is the score for distance to a bus stop with at least a 'good' (as defined within the Accessibility Assessment) service, and the distance to a railway station.

No site was discounted in Stage 3 based on the outcome of the Accessibility Assessment.

### **C3. Previously developed land**

The NPPF advises that identified development needs should be planned for in way that makes as much use as possible of previously-developed land. Where release of land from the Green Belt is required and justified to meet development needs, paragraph 142 of the NPPF states that “plans should give first consideration to land which has been previously-developed...” The existence and extent of previously developed land on each of the sites under consideration has therefore been recorded on the site assessment proforma.

The glossary at Annex 2 to the NPPF defines previously-developed land as:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for mineral extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed by where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

The completion of this section of the proforma has been informed by the GBBR – Assessment of Previously Developed Land (2019), the extent of built form coverage identified in the 2018 review of Green Belt sub-areas, as well as aerial photography and review of the site’s planning history. Sites were not discounted in Stage 3 where they did not include any previously-developed land.

### **C4. Green Belt performance and integrity**

The purpose of carrying out the GBBR was to identify areas which do not properly fulfil the purposes of designating land as Green Belt, and to identify areas which are of less importance to the integrity of the wider strategic Green Belt. Sites which perform strongly against the purposes, or which are important to the integrity of the Green Belt, were discounted at Stage 1 of this methodology (except where promoted by the landowner).

It is considered that areas of the Green Belt which perform most strongly against the purposes play a role in promoting sustainable patterns of development, as required by paragraph 142 of the NPPF. Strongly-performing land maintains the identity of each of Elmbridge’s individual and distinct settlements, and directs development towards the urban areas. As such, the performance of the site against the purposes has been given significant weight in the overall conclusion. Where the positive and negative impacts of development on a site are finely-balanced, greater weight has been given to preserving the openness and permanence of the existing Green Belt, in accordance with the generally-restrictive approach to development on land designated as Green Belt articulated within national policy.

This section of the proforma summarises the performance of the site under consideration against the purposes and its importance to the wider Green Belt. The GBBR assessments from 2016 and 2018 were relied upon to complete this section, but professional judgement has been used to consider the applicability of these findings to sites promoted by landowners, where the boundaries are not contiguous with a local-area or sub-area considered within the GBBR.

The summaries identify instances whereby the release of the site under consideration would have an impact on the performance of neighbouring local/sub-areas, taking into account the potential cumulative impact of release.

This section also considers the resultant Green Belt boundary if the site was removed: paragraph 143f) of the NPPF advises that boundaries must be clearly defined, “using physical features that are readily recognisable and likely to be permanent.” Sites should be considered for development only where there is an existing defensible physical boundary, or where there is a realistic prospect of achieving one as part of the development process. Opportunities to strengthen existing boundaries have also been highlighted where identified.

## **C5. Landscape sensitivity**

The rating applied within the Landscape Sensitivity Study (2019) has been used to complete this section of the proforma. The Study assessed the extent to which the character and quality of the landscape in the Borough is sensitive to change from the introduction of a large scale residential and mixed-use development.

Each landscape unit assessed within the Study was awarded one of the following ratings:

High	The landscape is highly sensitive to change arising from residential/ mixed-use development. A very high degree of care will be needed in considering the location, design and siting of any change within the landscape.
Moderate-High	The landscape has a moderate-high sensitivity to change arising from residential and mixed-use development. A high degree of care will be needed in considering the location, design and siting of any change within the landscape.
Moderate	The landscape has a moderate sensitivity to change arising from residential and mixed-use development. Although the landscape may have some ability to absorb change, some alteration in character may result. Considerable care is still needed in locating and designing such developments within the landscape.
Moderate-Low	The landscape has a moderate-low sensitivity to change arising from residential and mixed-use development. The landscape may have relatively greater ability to absorb change although care is still needed in locating and designing such developments within the landscape. There may be opportunity for mitigation, enhancement and restoration.
Low	The landscape has a low sensitivity to change arising from residential and mixed-use development. Change can potentially

	be more easily accommodated or there may be considerable opportunities to integrate such developments within the landscape, to positively create new character, or restore/enhance the landscape. Sensitive design is still needed to accommodate change.
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The eventual visual impact of development will depend on its nature, siting, size, detailed design and the position and distance from which it is viewed. For the majority of sites considered, this information was not available at the time of the assessment. The Study was undertaken on a Borough-wide scale so caution is required when applying its findings to individual sites, but it is considered to provide a useful base from which professional judgement has been applied to consider the likely impacts of development in the overall conclusion. Where there is the potential for mitigation measures to have an impact on the resulting visual effects of development on the landscape, narrative has been provided in part F. of the proforma.

In a small number of cases, the land parcel falls within more than one landscape unit. Where this occurs, both ratings have been identified and taken into consideration.

Whilst the findings of the Study and professional judgement as to the impact of the scale of development proposed on visual amenity form part of this site assessment methodology, it has not been pre-supposed that change would be negative. Regard is had to the sensitivity of the landscape both within the Sustainability Appraisal at part G. of the proforma and the overall conclusion, but this is weighed against the other criteria in order to identify potential sites for release from the Green Belt. As such, no site was been discounted based solely on its sensitivity rating.

## **D. Availability**

A site is considered to be available when, based on the information available, there is confidence that the land is controlled by a landowner/developer who has expressed an interest in developing the site. Information submitted in relation to the Call for Sites exercises, in response to the consultations carried out under Regulation 18, and recent planning history has been used to complete this section of the proforma.

Some of the land parcels considered had been promoted for development at some stage during the plan-making process but had not recently been put forward. In these cases, the lack of up-to-date information on availability has not ruled a site out, but has had an impact on assessment at part E. of the proforma which addresses deliverability.

## **E. Achievability**

A site is considered 'achievable' where there is a reasonable prospect that a particular type of development will occur on the site at a particular point in time. This is essentially an initial judgement about the viability of the site and development proposed: it incorporates consideration of the appropriateness and likely market attractiveness for the type of development proposed and the readiness of the land to be developed.

Considering information from site promoters, professional judgement and industry research as well as information gathered to complete earlier sections of the proforma, the following factors have been considered:

### **E1. Absolute constraints**

The findings of the earlier identification of absolute constraints on the site are summarised here: whether such constraints exist on the site, and the extent of their coverage.

### **E2. Other constraints**

Other constraints were identified in step A.2 of the proforma and, whilst they would not necessarily preclude development coming forward on a particular site; they may affect the nature, extent or location of development. As well as the constraints listed earlier, professional judgement and local knowledge have been used to identify constraints to development which have not been mapped, such as access issues or ground conditions. Constraints which would require a financial contribution to be provided by way of a planning obligation are highlighted. The constraints identified in step A.2 are mostly fixed and are unlikely to be affected by the adoption of a new Local Plan.

Not every constraint will have an impact on the achievability of developing the site. Where a particular constraint is considered relevant, it has been discussed in this section. The potential for mitigation of the impact has also been considered here.

### **E3. Market factors**

Professional judgement, local knowledge and industry research have been used to consider factors which would impact on the demand for the development proposed. In many cases, there are no specific issues which would render a site more or less attractive, but benefits (such as proximity to a mainline train station) and disadvantages (such as proximity to a major highway network) are identified and considered here.

### **E4. Viability factors**

Where constraints have been identified in section A2., commentary on the potential impact of these on economic viability is given here. The impact on viability is dependent on the type of constraint and professional judgement as to its severity, the extent of site coverage and the extent of the work required either to overcome the constraint or mitigate the impact of the development on it.

This is a high-level overview which seeks to highlight any potential barriers to viable development and does not attempt to quantify the impact of the constraint in financial terms.

## **F. Deliverability**

Paragraph 67 of the NPPF requires that the Local Plan identifies:

- a) “specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.”

Taking account of information gathered in relation to suitability, availability and achievability as well as industry evidence, a professional judgement has been made as to the likely timeframe for development to be realised. Research indicates that greenfield sites come forward at a broadly similar rate to brownfield sites, but greenfield sites deliver homes more quickly<sup>4</sup>.

This judgement has incorporated consideration of the nature and extent of constraints affecting the site and technical work required in relation to them, recent planning history, the need to assemble adjoining land parcels (where applicable) and the likelihood of phased development on larger sites.

The information submitted by land promoters indicated that many of them would be deliverable within the first five years of the plan period, but in most cases this was considered overly optimistic as pre-application discussions had not taken place, an application for permission had not been submitted and/or there is technical work needed to address constraints. On the majority of sites where land ownership and availability is known, the earliest likely timeframe for delivery is in the period 6-10 years. Where land has been promoted at some stage during the plan-making period, but not within the last two years, delivery has been assumed at no earlier than years 11-15 of the plan period.

## **G. Added beneficial use**

Paragraph 141 of the NPPF requires that local planning authorities plan positively to maximise the beneficial use of land within the Green Belt: “to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes; visual amenity and biodiversity; or to improve damaged or derelict land.” Though this site assessment methodology seeks to identify sites which could be removed from the Green Belt to meet the Borough’s development needs, it was considered necessary to incorporate these opportunities into the proforma. This is firstly because sites which are eventually discounted will remain within the Green Belt and there will remain a duty to plan positively for their use in accordance with paragraph 141, and secondly because where a site is considered appropriate for release, the planning benefits arising from development should be maximised.

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<sup>4</sup> ‘Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?’, Nathaniel Lichfield & Partners, 2016

The information used to complete this section of the proforma has been drawn primarily from the submissions of land promoters. Where a site has not been promoted, or the promotion did not include discussion or all/any of the benefits, professional judgement and local knowledge has been used to identify opportunities.

In some cases, no added benefits have been identified. Where there would be dis-benefit, this has also been highlighted. The considerations discussed in this section have been taken into account in the overall conclusion.

## H. Sustainability Appraisal

All of the sites for which proformas were completed have been subject to Sustainability Appraisal. This process seeks to promote sustainable development by considering the extent to which the draft Local Plan will contribute towards meeting environmental, social and economic objectives. This part of the site assessment identifies the likely effects of development on each site. The Sustainability Appraisal uses the scoring system shown in the table below.

Score	Description	Symbol
<b>Significant positive impact</b>	Significant positive change towards sustainability	++
<b>Minor positive impact</b>	Minor positive change towards sustainability	+
<b>Neutral</b>	The option contributes neither positively nor negatively towards the objective	0
<b>Minor negative impact</b>	Minor negative change towards sustainability	-
<b>Significant negative impact</b>	Significant negative change towards sustainability	--
<b>Uncertain</b>	It is unclear whether there is the potential for a negative or positive effect on the objective	?

Broadly, if a site scores a '- -' it is considered that the development could pose significant harm even with the use of mitigation measures, whereas a score of '++' indicates that the development has potential to bring about clear environmental, social or economic benefits. Commentary to justify the score awarded against each objective is provided, based on the information gathered within the earlier sections of the proforma and professional judgement. The Sustainability Framework against which each of the sites was assessed can be found at Appendix 1.

The Sustainability Appraisal is a standalone assessment, the results of which are taken into account in the overall conclusion on the site's suitability for release from the Green Belt. Only where a site is appraised as having significant negative effects which cannot be mitigated, or balanced by positive effects, were sites discounted based on the result of the Sustainability Appraisal.

All of the sites recorded some negative effects and many of the effects were graded as neutral. Where uncertain or negative impacts arise, some of these may be

mitigated by implementation of the generic policies in the new Local Plan. For example, sites recording a minor negative impact against the biodiversity objective could be dealt with by overarching policies concerning conservation and net gain. Site-specific issues could be addressed within individual site allocation policies.

Although there will be some residual negative effects remaining following policy implementation, it is considered that where a site has been recommended for release that the majority of negative or uncertain effects can be mitigated and that remaining negative effects can be outweighed by the positive effects.

## **I. Conclusion**

Paragraph 146 of the NPPF states that the boundaries of existing Green Belts should only be altered where exceptional circumstances 'are fully evidenced and justified'. The Council has already undertaken a review of the exceptional circumstances<sup>5</sup> which apply to the Borough as a whole and which might justify the release of land to meet its development needs, in the event that sufficient capacity cannot be identified within the urban area.

This final section of the proforma addresses whether or not the exceptional circumstances exist in relation to the particular site under consideration, with reference to its existing and proposed uses and development capacity. In many cases, it was concluded that the sites would contribute towards meeting the Borough's overall need for housing and would be of a scale that there would also be significant provision of affordable housing.

Where national planning policy indicates that the existing use should be protected and there is no reasonable prospect of the use being re-located to an alternative site, it has been concluded that exceptional circumstances do not exist.

Following the initial analysis of the site's suitability for development, and an assessment of its sustainability, an overall conclusion has been made as to whether or not the site should be further considered for release from the Green Belt. The full justification for this conclusion is set out in the proforma's final section.

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<sup>5</sup> Exceptional Circumstances Case, September 2016 - <https://www.elmbridge.gov.uk/planning/planning-policy/evidence-to-inform-the-new-local-plan/>

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## Appendix 1 – Sustainability Framework

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SA Objectives	++	+	0	-	--
<b>1. To provide sufficient housing to enable people to live in a home suitable to their needs and which they can afford.</b>	Deliverable (1-5 Years) or Strategic Site (100+ units).	Contributing to meeting the housing requirement.	No housing is being proposed.	More than 1 dwelling is being lost by the proposed development.	More than 50 dwellings would be lost by the development proposal.
<b>3. To conserve and enhance, archaeological, historic and cultural assets and their settings.</b>	N/A	Development likely to have a positive impact on historic character.	No impact on archaeological, historic and cultural assets.	Impact on setting of archaeological, historic and cultural assets / partial loss of assets.	Complete loss of archaeological, historic and cultural assets.
<b>4. To reduce the need to travel, encourage sustainable transport options and improve accessibility to all services and facilities.</b>  <b>USE ACCESSIBILITY STANDARDS OVERALL SCORES FOR THE RESULTS</b>	<b>Excellent</b> 0 - 400m distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest	<b>Good</b> 400m to 800m distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest	<b>Fair</b> 800 - 1.2km distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest	<b>Moderate</b> 1.2 - 1.6km distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest	<b>Limited</b> Over 1.6km distance to bus stop with good / very good / excellent service; railway station; major service and employment centre or locally significant employment area; primary school; secondary school; health centre / GP; dentist; nearest retail centre; local services; and publicly accessible green spaces.

SA Objectives	++	+	0	-	--
	centre / GP; dentist; nearest retail centre; local services; and publicly accessible green spaces.	retail centre; local services; and publicly accessible green spaces.	retail centre; local services; and publicly accessible green spaces.	retail centre; local services; and publicly accessible green spaces.	
<b>5. To make the best use of previously developed land and existing buildings</b>	PDL on the site will be used.	N/A	Mix use of PDL and greenfield.	N/A	Greenfield.
<b>6. To support economic growth which is inclusive, innovative and sustainable.</b>  <b>USE SPECIFIC ACCESSIBILITY SCORES FOR THE RESULTS</b>  <b>CONCLUDE ON THESE MATTERS AS A SINGLE</b>	Excellent 0-5km distance to major service centre / employment location or 0-2.5km distance to significant employment site.	Good 5.1-10km distance to major service centre / employment location or 2.6-5km distance to significant employment site.	Fair 10.1-15km distance to major service centre / employment location or 5.1-7.5km distance to significant employment site.	Moderate 15.1-20km distance to major service centre / employment location or 7.6-10km distance to significant employment site.	Limited 20+km distance to major service centre / employment location or 10+km distance to significant employment site.
	N/A	The site is of a scale (over 0.25ha) to enable the development of new employment units as part of the	N/A	The site is not of a scale (under 0.25ha) to enable the development of a new neighbourhood	N/A

SA Objectives	++	+	0	-	--
<b>SCORE.</b>		development.		which would improve access to and provision of additional services and facilities as well as employment opportunities.	
<b>7. To provide for employment opportunities to meet the needs of the local economy.</b>	Creates a large new workforce / Strategic Sites (100+ jobs).	Creates new workforce in a single employment or retail use or business / midrange sites.	Only creates temporary construction jobs (not a new workforce) / smaller sites and modest additions.	Partial loss of jobs (existing employment use).	Loss of all jobs / partial loss of jobs in a strategic employment area.
<b>11. To reduce flood risk</b>	No fluvial or surface water flood risk / flood zone 1.	Flood Zone 1 but there are surface water flooding issues (1 in 1000 yr) on site and / or any risk affecting access).	Partially Flood Zone 2 and / or surface water flooding issues (1 in 100 yr).	Mostly or all Flood Zone 2 / Flood Zone 3a and / or risk of 1 in 30 year surface water flooding on less than 20% site area.	In functional flood plain (FZ3b) or risk of 1 in 30 year surface water flood risk on more than 20% site area.
<b>12. To improve the water quality of rivers and groundwater and maintain an adequate supply of water.</b>	N/A	Site does not lie within a Groundwater Protection Zone.	N/A	Site lies in Groundwater Protection Zone.	N/A
	N/A	No waterbody on	N/A	Water courses	N/A

SA Objectives	++	+	0	-	--
<b>CONCLUDE ON THESE MATTERS AS A SINGLE SCORE.</b>		site.		dissect site or waterbody on site.	
	N/A	Existing infrastructure serves site and surrounding area.	N/A	Water utility infrastructure not easily assessible.	N/A
<b>13. To reduce land contamination and safeguard soil quality and quantity</b>  <b>CONCLUDE ON THESE MATTERS AS A SINGLE SCORE.</b>	Potentially contaminated land on site.	N/A	No potentially contaminated land on site.		
	Site contains non-agricultural & urban quality soils.	The site contains Grade 4 quality soil.	N/A	Loss of Grade 3 quality soil.	Loss of Grades 1 & 2 quality soils.
<b>14. To ensure air quality continues to improve and noise and light pollution are reduced.</b>  <b>CONCLUDE ON THESE MATTERS AS A SINGLE SCORE.</b>	N/A	Site location does not fall within a proposed or existing Air Quality Management Area or is not in proximity of a major highway network (M25 / A3).	N/A	Site location is not within but adjoins a proposed or existing Air Quality Management Area or is in proximity of a major highway network (M25 / A3).	Site location falls within a proposed or existing Air Quality Management Area and would require mitigation through design to resist existing pollution threats.
	N/A	The site is in or adjacent to the	The site is PDL or adjacent to the	The site is not located in or	N/A

SA Objectives	++	+	0	-	--
		built-up urban area - unlikely to be a noticeable intrusion from light or noise pollution.	built-up urban land.	adjacent to the built-up urban area and therefore will increase perception of noise, light and air pollution.	
<b>15. To protect and enhance landscape character.</b>  <b>CONCLUDE ON THESE MATTERS AS A SINGLE SCORE.</b>	N/A	Site located in the urban built-up area with no open green space adjoining or neighbouring the site.	Assessment shows low or moderate-low landscape character impact.	Assessment shows moderate landscape character impact.	Assessment shows high or moderate-high landscape character impact.
			Site is not covered or near a landmark or strategic view.	Site will impact on landmark or strategic view.	
<b>16. To conserve and enhance biodiversity.</b>	N/A	Site is in the built-up urban area or on PDL and not covered by any biodiversity designation.	N/A	Site is a partially greenfield land or partially covered by a biodiversity designation.	Site is in its entirety a greenfield or covered by a biodiversity designation.

## Appendix 2 – List of promoted sites

<b>GB reference</b>	<b>Site Address</b>
GB1	SA-89 – Land northeast of Waterside Drive, Walton-on-Thames, KT12 2JP
GB2	SA-35 – Land south of Ruxley Crescent, Claygate, Esher, KT10 0TZ
GB3	LA-18 – Land at Pains Hill Farm, Portsmouth Road, Cobham, KT11 1DN and land to its west and land at Bridge Lodge, Convent Lane, Cobham, KT11 1HL
GB4	SA-9 – Land south of Randolph Close, Stoke D’Abernon, Cobham, KT11 2SW
GB5	SA-73 – Land at Esher Rugby Club, 369 Molesey Road, Walton-on-Thames, KT12 3PF
GB6	Land to the east of Octagon Road, Whiteley Village, Hersham, KT12 4EH
GB7	SA-36 – Land south of Arbrook House, 36 Copsem Lane, Esher, KT10 9HE
GB8	Hunters Lodge, Horsley Road, Downside, Cobham, KT11 3NY
GB9	SA-4 - Land south of 58 Stoke Road, Stoke D’Abernon, Cobham, KT11 3PT
GB10	SA-51 - Manor Farm, Woodlands Lane, KT10 0TA
GB11	SA-82 - Land south east of Queen Elizabeth II Reservoir and west of Molesey Road, Walton-on-Thames, KT12 3PW (west of)
GB12	SA-79 - Land south of Rydens Road and north-east of Normanhurst Road, Walton-on-Thames, KT13 3DU
GB13	SA-94 – Land north east of Queens Elizabeth II Storage Reservoir and south of Walton Road, Walton-on-Thames, KT8 2HF (west of)
GB14	SA-21 - Corbie Wood, Seven Hills Road – Land north of Flagstaff and south of Corbie Cottage, Seven Hills Road, Walton-on-Thames, KT12 4DE
GB15	Land northeast of Beech Hill, Byfleet Road, Cobham, KT11 1EE
GB16	Land at Rodona Road, St George’s Hill, Weybridge, KT13 0NP
GB17	SA-32 – Land northeast of Horrington Farm, Vale Road, Claygate, Esher, KT10 0NN
GB18	SA-88 – Land north of Island Barn Reservoir, Ray Road, Molesey (south of KT8 2LF)
GB19	SA-14 – Land east of Danes Way, Oxshott, KT22 0LX
GB20	SA-28 – Hillview Nursery, Seven Hills Road, Walton-on-Thames, KT12 4DD
GB21	LA-70 – Land at Imber Court, Ember Lane, East Molesey, KT8 0BT
GB22	SA-72 – Land east of Molesey Road and south of Field

	Common Lane, Walton-on-Thames, KT12 3PN
GB23	SA-85 – Land south of Waterside Drive, Walton-on-Thames, KT12 2DY
GB24	SA-75 – Land south of Esher Sewage Treatment Works and west of Farm Road, Esher, KT10 8AU
GB25	LA-58 – Land north of A309, Woodstock Lane North, Long Ditton, KT6 5HN
GB25-2	Land north of the A309 and west of Woodstock Lane North, Long Ditton, KT6 5HN
GB26	SA-25 – Land south of Holroyd Road, Claygate, Esher, KT10 0LG
GB27	SA-58 – Land east of 110 Telegraph Lane, Claygate, Esher, KT10 0DY
GB28	Land east of Ruxley Crescent, Claygate, Esher, KT10 0TZ
GB29	SA-53 – Land west of Slough Farm, 81 Telegraph Lane, Claygate, Esher, KT10 0DT
GB30	SA-60 - Land at Beazley's Farm, Littleworth Road, Esher, KT10 9PD
GB31	SA-45 – Land north of Woodlark Farm, Burhill Road, Hersham, Walton-on-Thames, KT12 4JD
GB32	SA-55 - Land east and south of Claygate Scout Centre, Oaken Lane, Claygate, Esher, KT10 0RQ
GB33	SA-65 – Land south of Hillcrest Gardens, Esher, KT10 0BX
GB34	SA-24 - Land at Horrington Farm (east), Vale Road, Claygate, Esher, KT10 0NN
GB35	SA-59 – Land east of Claygate House, Littleworth Road, Esher, KT10 9PN
GB36	Land at Chilbrook Road, Downside, Cobham, KT11 3PB
GB37	SA-37 - Land east of Turners Lane, Hersham, Walton-on-Thames, Surrey, KT12 4AW (north)
GB38	Winterdown, Portsmouth Road, Esher, KT10 9JN
GB39	Land adjacent to Joynings, Seven Hills Road, Weybridge, KT11 1ET
GB40	SA-3 - Land between Blundel Lane and M25, Woodlands Lane, Stoke D'Abernon
GB41	SA-87 – Land north west of Queen Elizabeth II Storage Reservoir and south east of Terrace Road, Walton-on-Thames, KT12 2EE
GB42	SA-16 – Cricket Ground Anvil Lane, Cobham, Surrey, KT11 1AQ (including land to the northwest and south)
GB43	Bramley Hedge Farm, Redhill Road, Cobham, KT11 1EQ
GB44	SA-83 - Land north of Field Common Lane and east of Molesey Road, Walton-on-Thames, KT12 3RX (north of)
GB45	SA-37 - Land east of Turners Lane, Hersham, Walton-on-Thames, Surrey, KT12 4AW (south)
GB46	SA-11 – Land east of Blundel Lane and south of Waverley Road, Stoke D'Abernon (south of KT11 2SS)
GB47	SA-68 - Weylands Old Treatment Works, Molesey Road, Walton-on-Thames, KT12 3PE

GB48	SA-6 – Land west of Cobham Station, Station Road, Stoke D'Abernon, Cobham, KT11 3BW
GB49	SA-54 – Land south of Lammas Lane, Esher, KT10 8AN
GB50	SA-74 – Land at and west of Cranmere Primary School, Arran Way, Esher, KT10 8BE
GB51	Land at Hersham Golf Club, Assher Road, Hersham, KT12 4RA
GB52	Norwood Farm, Elvedon Road, Cobham, Surrey, KT11 1BS
GB53	Cobham Saw Mill, Downside Road, Downside, Cobham, Surrey, KT11 3LY
GB54	SA-64 - Land south west of Heathside, Hinchley Wood, Dittons, Esher, KT10 9TF (south of)
GB55	Sandown Racecourse (Sites 1, 2 and 5 as proposed under application ref. 2019/0551)
GB56	Land at Brooklands College, Heath Road, Weybridge, KT13 8TU
GB57	SA-73 – Land at Esher Rugby Club, 369 Molesey Road, Walton-on-Thames, KT12 3PF (north)
GB58	SA-29 – Land at Horrington Farm (west), Vale Farm, Claygate, Esher, KT10 0NN
GB59	LA-47 - Land south of the A244 and north of the River Mole, Esher, KT12 4LL
GB60	SA-80 - Land north of Grove Way and west of Grove Way, Esher, KT10 8BE (north of)
GB61	No site considered under this reference
GB62	SA-47 - Land at and south of Burhill County Primary School, New Berry Lane, Hersham, Walton-on-Thames, KT12 4HQ
GB63	SA-41 - Loseberry Farm, Hare Lane, Claygate, Esher, KT10 9BU
GB64	SA-50 – Moore Place Golf Club, Portsmouth Road, Esher, KT10 9LN
GB65	LA-20 – Land at Chippings Farm, Elvedon, Cobham, KT11 1BS & Land at The Fairmile, Portsmouth Road, Cobham, KT11 1BW
GB66	Land at The Broom, Pains Hill, Portsmouth Road, Cobham
GB67	LA-14 - Land west of Blundel Lane, Cobham, KT11 2QF
GB68	Whiteley Village Redundant Works Yard, Chestnut Avenue, KT12 4DH
GB69	SA-93 - Land north of Rivernook Farm (Phase 2), Hurst Road, Walton-on-Thames
GB70	SA-55 – Land north of Wingham Court Care Home, Oaken Lane, Claygate, KT10 0RQ
GB71	Land at Suma Farm, Ockham Lane, Cobham, KT11 1LP
GB72	LA-72b - The Molesey Venture, Orchard Lane, East Molesey, Surrey, KT8 0BN
GB73	SA-51- Land at Manor Farm, Woodstock Lane south, Claygate, Esher, KT10 0TA
GB74	Waynflete Estate, More Lane, Esher, Surrey, KT10 8QA
GB75	No site considered under this reference number
GB76	Land east of Squirrels, Downside Common Road, Cobham, KT11 3NP

GB77	Land east of Arbrook Lane and south of Hare Lane, Claygate, Esher, KT10 9BU
GB78	Cold Norton Farm, Ockham Lane, Cobham, KT11 1LW
GB79	Land north of Kilrue Land, Hersham, KT12 5BN
GB80	Land east of Soprano Way and south of the A309, Hinchley Wood, Esher, KT9 1UF (north of)
GB81	No site considered under this reference number
GB82	LA-47 – Land south of the A244 and north of the River Mole, Esher, KT12 4LL
GB83	Chelsea FC Training Ground, Stoke Road, Stoke D’Abernon, Cobham, KT11 3PT
GB84	Land south of M25 at Chasemore Farm – around Cobham Services
GB85	Long Orchard Farm, Cobham, Surrey, KT11 1EL
GB86	The Depot, 46 Redhill Road, Cobham, KT11 1EQ
GB87	Bramley Orchard, Redhill Road, Cobham, KT11 1EQ
GB88	Land north east of Burhill Golf Club, Burhill, Hersham, KT12 4AY
GB89	Land at Blackhills, Esher
GB90	The Oaks, Woodstock Land south, Hinchley Wood

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## Appendix 3 – Map of sites discounted at the initial assessment of Green Belt integrity

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