Examination Statement

St Piers Estate

Young Epilepsy

Tandridge District Council

Examination in Public

Matter 4 – Green Belt Boundary Alterations
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1. Introduction

1.1. This Examination Statement is submitted by Savills on behalf of Young Epilepsy (YE). YE is a charitable organisation that provides education and health services to children with epilepsy and other related conditions at facilities located at St Piers Estate, Lingfield.

1.2. Young Epilepsy participated in the Regulation 19 Consultation in September 2019 (see Appendix A) in relation to the Part 3 Green Belt Assessment (GBA) which was published three months prior, in June 2018. Throughout Part 1 and Part 2 of the GBA St Piers Estate had been identified as an area for further investigation (AFI 035). However, whilst the site was identified in Part 2 of the GBA for consideration as part of the exceptional circumstances test, the site was not included within Part 3 of the GBA.

1.3. YE seek to remove the site from the Green Belt as the site is previously developed and the designation is prohibitively restricting the Charity’s ability to maintain and improve the specialist health, education and residential services for children and young people with special needs at St Piers Estate. A site plan identifying the extent of land proposed to be removed from the Green Belt is appended to this letter (Appendix B). As can be seen from the site plan, Young Epilepsy are not seeking removal beyond the boundaries of the existing built environment.

1.4. It is considered that exceptional circumstances exist to release the site from the Green Belt, notably because the site fails to meet the purposes of the Green Belt (as recognised by TDC).

1.5. As noted in the GBA, the site is not considered to uphold the Green Belt’s fundamental characteristic of openness. This demonstrates that the Green Belt designation is redundant on this site and should be removed.

1.6. This Statement will respond to Matter 4, Questions 4.1; 4.4; and, 4.6 and set out how TDC’s GBA is inconsistent with National Planning Policy and should be reconsidered before the emerging Local Plan can be found sound.
2. **Response to Inspectors Initial Matters, Issues and Questions**

2.1. Savills, on behalf of Young Epilepsy, has informed the Programme Officer, Chris Banks, of their intentions to participate at the hearing sessions relating to Matter 4.

**Matter 4 Green Belt Boundary Alterations**

**Issue:** Is the Green Belt Assessment consistent with national planning policy for Green Belts, is it based upon appropriate criteria and is it adequate and robust?

**4.1. Was the Green Belt Assessment undertaken on the basis of a clear methodology consistent with national planning policy for protecting Green Belts?**

2.2. No.

2.3. National Planning Policy for protecting the Green Belt is deliberately vague to provide the flexibility for individual Councils to respond to the needs and constraints in each region. In lieu of blanket policy, the NPPF sets out the five purposes of the Green Belt (para. 80), making provision for Councils to review their Green Belt boundaries, in exceptional circumstances, through the preparation of the Local Plan (para. 83).

2.4. Whilst TDC has used the NPPF’s five purposes of the Green Belt to inform their GBA, they have gone beyond what is reasonable in their interpretation of National Policy and its application at a local level. The Councils’ interpretation of Purpose 2 is a prime example of this.

  **Purpose 2: ‘to prevent neighbouring towns merging into one another.’**

2.5. TDC has interpreted purpose two as “where neighbouring towns or settlements could merge if the land between them did not remain in the Green Belt”. By applying purpose two to both towns and settlements, this Green Belt policy is extended beyond what is considered reasonable or necessary. This is overly prohibitive and inconsistent with the NPPF as it has ultimately resulted in preventing underperforming Green Belt land from being released for development.
2.6. The GBA methodology is also flawed due to the lack of clarity throughout the assessments. The St Piers Estate site is identified as an area for further investigation but then has not been taken forward with limited explanation. TDC seem to have only released sites which provide for development rather than those sites not considered to meet the purposes, which is incorrect. The NPPF is clear that “plans should not include land which it is unnecessary to keep permanently open in the Green Belt” (para 85). Other LPAs have removed such land including Guildford and Reigate and Banstead in recent Development Plan Documents.

2.7. Additionally, the methodology used within the GBA is not considered positively prepared, justified or consistent with National Policy. The process set out in the assessment is reductionist as it merely seeks to assess Green Belt boundaries based on their relationship to existing settlements. This corresponds strongly to the preferred spatial strategy outlined in the Local Plan Review, set out prior to the findings of the GBA, and undermines the value of the this study as part of the Local Plan Evidence base.

2.8. This ambiguity demonstrates the need for the Council to undertake a robust assessment of the whole District, focusing on each parcel’s fulfilment of Green Belt purposes and the potential sensitivity for development in those locations. To create a sound Plan, the GBA should assess the sites against the purposes of the Green Belt and the Council resolve which are the most appropriate sites to allocate based upon the findings of all available evidence.

4.4. Is the site selection methodology for sites to be released from the Green Belt robust and are the proposed alterations to the Green Belt boundaries justified?

2.9. Throughout Part 1 and Part 2 of the GBA, TDC identify Areas for Further Investigation (AFIs) which are subsequently recommended for further assessment within the next stage of the GBA process. The land at St Piers Estate was identified as an AFI and recommended for review in the Part 3 GBA.

2.10. Notably in the GBA Part 2 (2016) where St Piers Estate is considered in further detail, TDC consider the following in relation to four out of the five Green Belt purposes:

a) Due to its siting, scale and the use of land, it is not considered to serve the purposes of preventing sprawl;

b) Nor does it prevent settlements from merging;
c) The site has been subject to significant development and as such it has not served to safeguard the
countryside from encroachment and in addition the extent and layout of existing development results
in a sense of containment that does not support the open character of the Green Belt.

d) Nor does it serve the purpose of preserving the character of setting of a Conservation Area

2.11. With regards to ensuring recognisable and defined Green Belt boundaries (NPPF 2012, para 85), TDC
recognise the boundaries at St Piers Estate can be defined by the Ancient Woodland and public footpaths.
In addition, when considered in terms of openness the GBA Part 1 states that 'whilst relatively spacious
within the site, the extent and layout of the development results in a contained effect, and does not support
the fundamental characteristic of openness.'

2.12. Part 2 of the GBA concluded that the site does not serve the purposes of the Green Belt and 'is
recommended for further consideration or whether or not exceptional circumstances exist as part of the
Green Belt Assessment' (Ref: AF1 035, page 24).

2.13. However, whilst the site was recommended for further consideration within Part 2 of the GBA, it was
unfoundedly dismissed at paragraph 3.9 of Part 2. In this, the Council stated that areas with development
that post-date the GB designation, but defined as appropriate development in the NPPF, are also excluded
from further consideration.

2.14. There had been no previous indications throughout the GBA process that the development permitted after
the GB designation would automatically exclude a site from further consideration for exceptional
circumstances, nor is there precedent in National Policy to justify this conclusion.

2.15. The omission of the St Piers Estate from Part 3 of the GBA proves that the site selection methodology was
not robust or justified. There is no basis for the Council to exclude the St Piers Estate from further
investigation. This demonstrates that the evidence is not positively prepared, justified or robust. For the
Plan to be found sound, the Council should be required to reevaluate their GBA and ensure that the study
is undertaken objectively and independent of the Local Plan.
4.6. In overall terms, are the proposed boundaries of the Green Belt defined clearly and would they be likely to be permanent or capable of enduring beyond the plan period?

2.16. Paragraph 83 of the NPPF dictates that Green Belt boundaries should be considered in the long term, with any alterations capable of enduring beyond the plan period.

2.17. This GBA is the first major Green Belt review in the District since 1950, demonstrating the sheer scope of work required to provide a comprehensive understanding of how the land is performing against the purposes of the Green Belt.

2.18. The GBA Part 1, page 189 [Historic Assessments of the Green Belt], relates to the St Piers Estate and states that whilst the site has been designated within the Green Belt since 1974, further extensions and intensification for the site has been permitted. Including: planning permission for an education unit; classrooms; offices; and parking. This demonstrates that special circumstances have already been proven as existing on the Estate. Therefore, the presence of the Green Belt designation does not inhibit development on the site, but makes efforts to maintain and improve the site unnecessarily bureaucratic, inefficient and costly.

2.19. As already established in paragraphs 2.10 and 2.11, the site does not fulfil the purposes of the Green Belt and its designation as Green Belt land contradicts the fundamental characteristic of openness. In addition, whilst the designation has not prohibited development on the site, it has made the planning process significantly more onerous, with significant financial repercussions to the charity.

2.20. The St Piers Estate should be removed from the Green Belt to ensure permanence of the revised boundaries. The GBA Part 1 clearly demonstrates that the Ancient Woodlands and Public Right of Ways encapsulating the site form clear and defensible Green Belt boundaries.

2.21. It is considered that as the Council has already recognised that the site does not meet the purposes of the Green Belt, does not support the fundamental characteristics of the Green Belt and offers recognisable and defensible boundaries, it will, at some point, be removed from the Green Belt. Therefore, the site should be removed to ensure that these changes to Green Belt boundaries endure beyond the plan period, in accordance with National Policy.
3. Conclusion

3.1. As set out in the comments made above in respect of the Inspector’s Main Issues and Questions, Young Epilepsy, consider that the Green Belt Assessment is unjustified, ineffective and inconsistent with National Planning Policy.

3.2. St Piers Estate does not meet the purposes of the Green Belt as acknowledged by TDC in their Green Belt Review and therefore should be removed from the Green Belt. Other LPAs have released land similar to St Piers Estate within their Development Plan Documents and YE request that TDC do the same.

3.3. For the Local Plan to be found sound, TDC should be required to reconsider their evidence base to ensure that it is independently and objectively collated. This will ensure that their Local Plan is founded on appropriate, relevant and up-to-date evidence, in accordance with the NPPF.

3.4. Without significant modifications to the Green Belt Assessment, Young Epilepsy cannot support the adoption of this Local Plan.
Appendix A – Regulation 19 Representation
Dear Sir/Madam,

Savills has been engaged by Young Epilepsy (YE) to submit representations to the current consultation on the draft Local Plan (Regulation 19). YE provides education and health services to children and young people with epilepsy and related conditions, from the local community and nationally, at facilities located at St Piers Estate, Lingfield. These facilities are currently located within the Green Belt and this severely restricts the potential for further improving the services provided to children and young people, through on-site relocation or expansion of development.

For the Local Plan to be found sound, it should comply with the four tests of soundness, one of which is being consistent with National Policy. In accordance with the National Planning Policy Framework (NPPF) (2012) and its subsequent Revision (2018), the previously developed nature of the site means it is unnecessary for it to be kept permanently open. Accordingly, this representation seeks the removal of part of St Piers Estate from the Green Belt.

Throughout this representation, reference is made to both the NPPF 2012 and the NPPF Revision. Tandridge District Council’s (TDC) current timeline for submission of the Local Plan, prior to 24 January 2019, means that the Local Plan will be examined against the 2012 version in accordance with the transitional arrangements. Should, however, the Local Plan submission be delayed, it will be determined against the NPPF Revision.

A site plan identifying the extent of land proposed to be removed from the Green Belt is appended to this letter (Appendix 1). As can be seen from the site plan, Young Epilepsy are not seeking removal beyond the boundaries of the existing built environment.

**Site Description**

The site comprises a 27-hectare estate situated to the east of Lingfield and north of Dormansland. The property is accessed by St Piers Lane, which bisects the site. Existing developed floorspace on the site currently comprises circa 33,200m² and accommodates one of the largest employers in the District. The site is situated in the Green Belt, and contains three Grade II listed buildings (Lingfield Hospital School, Barn east of School and Granary south of School). These three buildings are situated centrally within the property. The estate is surrounded by woodland to the north, south and east which restricts views in and out of the site. The site is located in Flood Zone 1.

**The Green Belt**

The Government attaches great importance to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF (2012) and NPPF Revision considers the essential characteristics of Green Belts to be their openness and their permanence. The five purposes of the Green Belt are:

a) To check the unrestricted sprawl of large built-up areas;
b) To prevent neighbouring towns merging into one another;
c) To assist in safeguarding the countryside from encroachment;
d) To preserve the setting and special character of historic towns; and  

e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

The NPPF (2012) allows for the amendment to Green Belt boundaries through the preparation of a Local Plan where exceptional circumstances exist (paragraph 83). At this time, authorities should consider the Green Belt boundaries, having regard to their intended permanence. When defining amended boundaries, local planning authorities should not, amongst other criteria, include land for which it is unnecessary to keep permanently open (paragraph 85). The St Piers Estate currently accommodates 81 buildings and this, therefore, is of particular relevance. In this regard, a considerable proportion of the site is previously developed.

The TDC Green Belt Assessment (GBA) Part 1 (2015) identifies the site as falling within part of a wider site (ref: GBA 035). In relation to St Piers Estate, the GBA states "...generally the parcel is free from any significant concentration of development. The exception is the NCYPE (now named Young Epilepsy) site to the south west of the parcel". The TDC GBA notes that St Piers Estate is the main development in the parcel and includes a number of buildings. As such it was identified as an area of further investigation (ref: 035).

The part of the site which accommodates the buildings fails to meet any of the five purposes of the Green Belt for the following reasons:

The site is surrounded by woodland which acts as a natural barrier, preventing the unrestrained sprawl of further development. Furthermore, the containing effect of the woodland means that the site is only able to expand eastwards. Notably, YE are not seeking to remove the undeveloped eastern parcel of land from the Green Belt. This would therefore restrict development expanding eastwards towards any settlements. The Green Belt designation on part of the site also makes no contribution towards safeguarding the countryside from encroachment.

The buildings that comprise the St Piers Estate are spread across most of the site, however some peripheral land to the east, north and south still remains largely open, and arguably contributes to the purposes of the Green Belt. As such, this representation is not proposing the removal of these parts of the site from the Green Belt; only the land that contains existing buildings which evidently fails to contribute to the purposes of the Green Belt. For clarity, these areas are identified on the appended site plan (Green Belt Release Site Plan).

The site accommodates some heritage assets. These, however, are currently surrounded by built development. In this respect, the Green Belt status of the site does not actively preserve any special character attributed to these assets.

Finally, the retention of the site in the Green Belt does not assist in urban regeneration. The site does not encourage the recycling of other derelict sites across the Tandridge District as the site is itself previously developed land.

Notably in the GBA Part 2 (2016) where St Piers Estate is considered in further detail, TDC identifies the following in relation to four out of the five Green Belt purposes:

a) Due to its siting, scale and the use of land, it is not considered to serve the purposes of preventing sprawl;

b) Nor does it prevent settlements from merging;

c) The site has been subject to significant development and as such it has not served to safeguard the countryside from encroachment and in addition the extent and layout of existing development results in a sense of containment that does not support the open character of the Green Belt.

d) Nor does it serve the purpose of preserving the character or setting of a Conservation Area

With regards to ensuring recognisable and defined Green Belt boundaries (NPPF 2012, paragraph 85), TDC recognise the boundaries at St Piers Estate can be defined by the Ancient Woodland and public footpaths.
For the reasons outlined above, and as identified by TDC in their GBA, the majority of the site, falling within the Green Belt, does not contribute towards the five defined purposes. Part of the site, as identified in the appended plan, should therefore be removed from the Green Belt. This would not only reflect the requirements of the NPPF (2012) and subsequent Revision, but also allow YE future opportunities to ensure their sustainability and longevity as an important local employer and charity.

Whilst the site was identified in the TDC GBA Part 2 for consideration as part of the exceptional circumstances test, it appears the site is not included within Part 3 of the Council’s GBA. It is considered that exceptional circumstances exist to release the site from the Green Belt, most notably because the site fails to meet the purposes of the Green Belt (as recognised by TDC) and to allow future development associated with the use of the site.

**Ensuring the future sustainable use of the site**

As a not-for-profit provider of education, health and social care, at the St Piers Estate, Young Epilepsy faces the twin challenges of funding constraints and the changing needs of children and young people. Removal of the Green Belt restrictions will allow Young Epilepsy to further explore options that will ensure that it can continue to meet the needs of children and young people from the local community and nationally. In addition, this it would also ensure that YE can continue to be an important contributor to the local economy and a long-term source for local employment.

The Green Belt designation restricts YE from developing the site to help sustain its future in meeting the needs of children and young people with epilepsy and related conditions. At present, should YE wish to expand or adapt the existing uses on the site, or submit an application for development to help support the current operations, an application successfully demonstrating Very Special Circumstances would need to be submitted.

As a result, development aimed at improving the facilities at YE would result in cumulative expenses from planning applications that offer little certainty moving forward. It is important to note that as a not-for-profit charity, the additional expense would be diverted directly from funds benefitting children and young people. In addition, failing to secure planning permission would exaggerate the financial challenges associated with the delivery of education and social care. In the wider context, this could adversely impact the delivery of services and have wider social implications by failing to support the provision of essential community facilities.

For this reason and moving forward, YE would like to engage with key stakeholders to develop a comprehensive framework for its facilities to ensure certainty through the planning process. This is beneficial for both YE, the community and Tandridge District Council, as this would ensure the ongoing sustainability of an important community service and one of Tandridge District’s largest employers.

In order for the Local Plan to comply with national policy, and to ultimately be found sound, it is considered that the previously developed land and area of the site that includes the 81 buildings should be removed from the Green Belt, and the Policies Map amended accordingly. The NPPF is clear that local planning authorities should not include land for which it is unnecessary to keep permanently open. Exceptional circumstances exist in the form of the site not contributing to any of the five purposes and to ensure the ongoing sustainability of YE.

I would be grateful if this representation and the appended plan can be taken into consideration as part of the plan making process.

I trust that this is of assistance. If you require any further information or clarification, please do not hesitate to contact me.
Yours sincerely

Katherine Munro
Savills Planning
Appendix B – Proposed Green Belt Release
Appendix C – Excerpt of GBA Part One
This Area for Further Investigation is a levelled area divided by St. Piers Lane, located to the north of Dormansland and east of Lingfield. This is a stand-alone site, which is known as the NCOPE and serves as a school for those with epilepsy. It includes a notable number of buildings, which are sited either side of St. Piers Lane with open areas at its western end. The buildings range in age and size, but appear to include a historic farmhouse at its core and at least three buildings are listed. The site is partially abutted by Ancient Woodland, but the majority of the surrounding land comprises fields, which are tree and hedge lined.

**A: Map of Area for Further Investigation**

**B: Why was this selected as an Area for Further Investigation?**

The NCOPE School and another school are present in the Green Belt to the south-west of the parcel. The centre is a specialised facility for caring for children who have epilepsy. The site includes a number of buildings and whilst it has some screening, cumulatively this is a prominent feature in the countryside. As such, this area has been identified as an Area for Further Investigation.
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<tr>
<th>Question</th>
<th>Description</th>
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<tbody>
<tr>
<td>C</td>
<td>Summary of Consultation Comments applicable to Area for Further Investigation</td>
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<tr>
<td>D</td>
<td>Is there built form in the Area for Further Investigation and what is the nature, age and relationship with the setting of the built form?</td>
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<td>E</td>
<td>How much undeveloped land lies within the Area for Further Investigation and describe the undeveloped land?</td>
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<tr>
<td>F</td>
<td>Are there any definitive boundaries within the Area for Further Investigation? Would the boundary prevent sprawl and / or does the boundary contain existing development? Is there opportunity to create a permanent boundary? Please consider this even when the definitive boundary is across the administrative boundary.</td>
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<td>G</td>
<td>Does the Area for Further Investigation prevent settlements from merging; partially or fully? What would be the implications if this area merged? Consider where this may be two built up areas merging. Does the area provide separation, or could it provide separation?</td>
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<td>What is the current use of the land and how does this relate to the purposes of the Green Belt?</td>
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<td>I</td>
<td>Is there a Conservation Area within the Area for Further Investigation? Please set out the details of the Conservation Area, including the size of the Conservation Area, the boundaries, the setting of it within the Green Belt, the reason why it is a Conservation Area. Also provide information and consider any adjacent Conservation Areas.</td>
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<tr>
<td>J</td>
<td>Has this area been subject to development pressure? Refer to planning applications / appeals and identify the key Green Belt considerations mentioned in the report.</td>
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This site has been subject to notable development pressure. In 2000 permission was granted for the demolition of buildings and the erection of a single storey residential building for those with severe epilepsy. The very special circumstances recognised that it is a nationally important establishment and that the existing
facilities were poor (TA/2000/1451), permission was granted for a change of use of part of a boathouse to provide a swimming pool for hydrotherapy purposes (TA/2003/344) with the same very special circumstances. In 2007 (TA/2007/822) permission was granted for the replacement of a single storey building with a 2-storey building providing student accommodation on the very special circumstances grounds of the poor condition of existing facilities, the need to meet disability requirements and importance of the establishment. In 2009 two schemes were permitted one for the demolition of five accommodation blocks and other buildings and the erection of 3 buildings, providing residential and independent living accommodation as well as education facilities (TA/2009/231). The very special circumstance related to the inadequacy of the existing facilities, the demonstrable need for this amount of development and the importance of the establishment. A storage buildi was permitted on the basis of need for storage of specialist outdoor equipment (TA/2009/1558). Most recently permission has been granted for the demolition of 5 buildings and the erection of 6 cabins (TA/2013/81). The scheme constituting a valuable educational facility that would provide greater openness than fall-back positions were considered to amount to the very special circumstances that outweighed harm to the Green Belt. In 2014 permission was granted for the demolition and erection of a single storey building (TA/2014/608). The reason for approval included the lack of demonstrable harm to the openness of the Green Belt, the facil not being replaceable elsewhere, the fact that it meets specific need and the poor condition of existing facilities, In addition it is evident that a number of the buildi on-site pre-date the area’s designation as Green Belt.

K: In line with paragraph 81 of the National Planning Policy Framework, what opportunities does the Green Belt offer?

The school is not public land, but it is bounded by and crossed by public rights of way to the open countryside and as such this Area provides some public benefits. Given it is privately owned, it is considered that it does not offer additional opportunities over and above those already present.

L: Using all the above information, what is the final conclusion?

Given the siting, scale and nature of the use in this Area, it does not serve the purposes of preventing large built-up areas from sprawling, preventing settlements from merging or preserving the setting and special character of Conservation Areas, it is in an area which is, by definition, countryside and its setting is clearly that countryside. However, the level and type of development, including its use, do not relate well to the purposes of including land in the Green Belt. It has been the subject of development which post-dates the Green Belt and which has been granted on grounds of very special circumstances and although development has largely been contained within the built envelope of the site, the Green Belt has not prevented encroachment in this locality. Furthermore, whilst relatively spacious within the site, the extent and layout of development results in a contained effect, and does not support the fundamental characteristic of openness. Accordingly it is recommended that it is considered further as part of the Green Belt Assessment.
Appendix D – Excerpt of GBA Part Two
consideration as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist.

| AFI  | Moorhouse Tileworks | This Area for Further Investigation formed part of GBA parcel 019 identified in the Green Belt Assessment (Part 1) (December 2015) and includes the sandpits and Tileworks that make up a large proportion of the parcel. Whilst the Tileworks pre-date the Green Belt designation, these have been subject to further development since the Green Belt was designated with resulting impact on the countryside. Given their siting, scale, use and relationship with settlements/built-up areas, they are not considered to serve any of the purposes of including land within the Green Belt. Although development is mostly contained within the site’s original envelope, the site does not contribute to the openness of the surrounding Green Belt and, as such it is recommended that it should be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist. |
| AFI  | Lambs Business Park | The Green Belt Assessment (Part 1) (December 2015) identifies this Area for Further Investigation due to the significant concentration of development and resulting encroachment upon the countryside. Due to the scale of development, its siting and commercial/industrial use, this Area for Further Investigation is not considered to serve purposes 1, 2 and 4 of including land within the Green Belt. Whilst the Area for Further Investigation is located within the countryside, the Business Park is a Strategic Employment Site with a quarry located on the western edge of the site outside the boundaries of the strategic employment designation, and as such is not considered to safeguard the countryside from encroachment. Although development is contained, the Area has a developed appearance, which undermines the open character of the Green Belt. Accordingly, it is recommended that it should be considered further as part of the Green Belt Assessment in terms of whether or not exceptional circumstances exist. |
| AFI  | NCYPE School | The Green Belt Assessment (Part 1) (December 2015) identifies this as an Area for Further Investigation within GBA parcel 045, concluding that the school represents a prominent feature in the countryside. This Area for Further Investigation comprises a school with residential accommodation and a substantial amount of ancillary development. Many of its buildings pre-date the Green Belt designation, but it is evident that there has been significant development since then permitted on grounds of very special circumstances. Due to its siting, scale and the use of land within this Area, it is not considered to serve the purposes of preventing sprawl or settlements from merging nor does it serve the purpose of preserving the character or setting of a Conservation Area. Whilst the Area is located in the open countryside, it has been subject to significant development and as such it has not served to safeguard the countryside from encroachment, although the development is largely contained within the school site’s envelope. In addition, the extent and layout of existing development results in a sense of containment within the Area of Further Investigation that does not support the open character of the Green Belt. For these reasons, this Area for Further Investigation is recommended for further consideration of whether or not exceptional circumstances exist as part of the Green Belt Assessment. |
| AFI  | Land rear Green Lane | The assessment of parcel GBA 040 in the Green Belt Assessment (Part 1) (December 2015) identifies large prominent buildings within the countryside, along Green Lane, comprising industrial units at Mushroom Farm and Gatwick off-airport parking at Westlands Farm. |