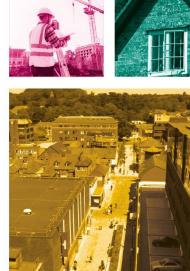
Surrey Heath Local Plan: Preferred Options (2019 – 2038)

Green Belt Review

Sustainability Assessment

























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I. Introduction

- 1.1. Surrey Heath Borough Council is preparing a new Local Plan which will set out the strategies and policies that will guide the development of the Borough up to 2038.
- In developing the new Local Plan, it is essential that the Council is able to draw upon a comprehensive evidence base that provides robust, relevant and up-to-date evidence in respect of a range of strategic matters that affect Surrey Heath. This will enable sound decisions to be made in respect of the strategies and policies that are best placed to deliver a positively prepared Plan for the Borough which allows it to develop in a way that is sustainable and consistent with the Policies in the National Planning Policy Framework (NPPF).
- 1.3. To support the development of the Local Plan, Surrey Heath Borough Council has committed to undertaking a Green Belt Review, which builds upon the findings of the Green Belt and Countryside Study 2017. The Review comprises two documents which should be read in conjunction. The first of these is the Green Belt Review Main Document, which sets out:
 - The purpose of the Review;
 - Background to the Study, including the policy context of the Review in addition to relevant case law;
 - The assessment methodology prepared to identify:
 - a) The function of the Green Belt against the purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF);
 - b) The level of risk release of land would pose to the wider extent of the Green Belt.
 - Next steps in the consideration of whether exceptional circumstances exist to warrant an alteration to Green Belt boundaries.
- 1.4. The second document is this, the Green Belt Review Sustainability Appraisal. This document is additional to the Green Belt Review and should be read in conjunction with the Main Document. This document sets out the following:
 - The practical and policy context for sustainability in Green Belt review (Section 2);
 - How sustainability has been considered through the Green Belt Review (Section 3);
 - How the sustainability heat map developed to support the Review has been used and key findings (Section 4); and,
 - Conclusions and next steps (Section 5).



2. Policy Context

National Planning Policy Framework

- 2.1. The National Planning Policy Framework (NPPF) places sustainable development at the heart of planning policy. Paragraph 7 of the NPPF indicates that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 of the NPPF sets out that the planning system has economic, social and environmental objectives which are interdependent and should be pursued in mutually supportive ways to achieve sustainable development.
- 2.2. At Paragraph 11, the NPPF sets out a presumption in favour of sustainable development. For plan making, the presumption means that:
 - a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;
 - 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 in this Framework taken as a whole.
- 2.3. In respect of sustainable development in the context of Green Belts, Paragraph 142 of the NPPF sets out that:

When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. 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. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.



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2.4. At Paragraph 143, the NPPF indicates that when defining Green Belt boundaries, plans should ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development.

Relevant Case Law

- 2.5. In the High Court ruling in the case of Calverton Parish Council vs Nottingham City Council, Mr Justice Jay confirmed that when demonstrating exceptional circumstances, consideration should be given to a range of factors including the inherent constraints on supply/availability of land prima facie suitable for sustainable development and the consequent difficulties in achieving sustainable development without impinging on the Green Belt.
- 2.6. In the Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015), it was indicated that Green Belt studies should take account of the need to promote sustainable patterns of development, as required by paragraph 142 of the NPPF [even if] such an exercise would be carried out through the SEA/SA process.



3. Sustainability in the Green Belt Review

Introduction

3.1. In light of the policy and case law context set out above, it was recognised that sustainability considerations should inform the development of the methodology for the Green Belt Review. It was also recognised that, in the event that exceptional circumstances warranting an alteration to the Green Belt boundaries are later identified at a strategic level, an understanding of the relative sustainability of land within the Green Belt should be factored into the consideration of where Green Belt boundaries should be altered at the local level.

A heat map for sustainability

- 3.2. To develop an understanding of the sustainability credentials of relative areas of the Green Belt, a heat map for sustainability was created, using a RAG rating system.
- 3.3. To prepare the heat map, accessibility of services within the Green Belt was analysed. Accessibility to services provides a good indication of sustainability. Siting development in the vicinity of areas with good access to a range of services has the greatest capacity to not only minimise car travel, but also has capacity to realise wider sustainability benefits for example by boosting local economies, improving people's health and wellbeing, increasing social connections in communities, and tackling climate change.
- 3.4. The services that were taken into account in the preparation of the heat map included:
 - Schools, including primary schools, infant and junior schools (excluding secondary schools, private schools, independent schools and special needs schools¹) as defined by Surrey County Council;
 - Doctors surgeries as defined by NHS Choices;
 - Retail and employment opportunities comprising district, local and neighbourhood centres as defined by the Surrey Heath Core Strategy and Development Management Policies DPD;
 - Public transport access nodes, including bus stops and railway station.

¹ These facilities are expected to have a broader catchment and are therefore it is expected that pupils will travel further to access these facilities.





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- 3.5. Consideration was given to including cycle routes within the list of services taken into account in the preparation of the heat map. However, due to the limited provision of cycle routes in the east of the Borough, as defined by Surrey County Council, on balance it was concluded that this would not have contributed meaningfully to the assessment. The Council is none the less committed to working with partners to improve cycle paths across the Borough and recognises the significant contribution that cycle networks play in creating sustainable places to live and work.
- 3.6. The location of each service was mapped using GIS Mapping; then for each service, a set of distance criteria were developed that are unique to the accessibility expectations of the service concerned. A series of 'buffers' were then drawn around each service. Where land fell within the preferred distance of the service (as the crow flies), a green buffer was drawn. Where land fell within a reasonable distance from the service but beyond the green buffer, an amber buffer was drawn. Where land fell beyond the maximum reasonable distance from a service, an red buffer was drawn. The distances for each service, together with a descriptor of how the distances for 'red', 'amber' and 'green' categories were derived is set out in Table 1.
- 3.7. As will be noted from the Table below, two categories were set out relating to bus stops; one relating to the distance to any bus stop, and one relating to distance to bus stops benefitting from a regular service. This endeavours to reflect the additional benefits to sustainability arising from proximity to regular services.

Assessment Criteria	Red	Amber	Green
Distance from bus stop	Not within 800m of bus service	Between 800m and 400m from bus stop	Less than 400m from bus stop

Explanation: The Authority Monitoring Report (AMR) assesses development sites that have been completed in the monitoring year based on whether they are within 400m or a 5-minute walk of a bus stop. Therefore, for the purposes of the assessment, for a site to be considered 'green' it needs to be within 400m of a bus stop. On the basis that using a bus service means that there is an onward journey and a likelihood that a user would not also be using their car or alternative mode of transport, 'Amber' is assessed as an 800m distance, being double what would be considered a 'short 5 minute walk'.

Frequency of bus	Less than one	One service every	More than one
service within	service per hour, no	hour, limited weekend	bus service per
800m	weekend service	services	



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	hour, good
	weekend services

Explanation: With regards to frequency of bus services, as 800m is still considered a walkable distance, this is the marker distance which the assessment is based on. This has then been split by areas that have a frequent service (more than every hour, scoring green), those that have a one hour service (amber) and those that are less frequent (red). There are two criteria for bus services because it is considered to take into account both the distance from bus services and the frequency of services provided.

Distance from	Not within 3km of	Between 3km and 1km	Within Ikm of
railway station	railway station	away from a railway	railway station
		station	

The criteria for a green rating is based upon a 1km catchment (approximately a 10-15 minute walk). The amber assessment takes into account that people may cycle or indeed drive a short distance to a railway station, applying a 3 km catchment. This is based on a number of information sources, including the recently published How to save the Housing Crisis².

Distance from	Not within 800m of	Between 800m and	Within 400m of a
schools	primary school	400m from a primary	primary school
		school	

This criterion focuses solely on the distance from primary schools, applying a 400m distance for green that aligns with similar criteria applied in the AMR. For amber, a distance of 800m is applied (relating to a 10 minute walk), as a walk duration beyond this would likely not be practical for many families. Moreover, a key issue with many schools is parking during the start and finish of school which is exacerbated when families are not within walking distance of a school. It is recognised that for secondary schools, the catchment areas are much broader and, in some cases, specific bus services are provided for children in the morning and afternoon, for example between Chobham and Collingwood. Therefore, for the purposes of this assessment, it was not considered necessary to incorporate secondary schools.

https://www.sbs.ox.ac.uk/sites/default/files/2020-03/THE%20HOUSING%20SPRINT%20Report.pdf? platform=hootsuite – page 53



Distance from	Not within the	Between 2km and	Within 800m of a
local retail	distances specified	800m of a	neighbourhood
services	for an amber or	neighbourhood parade	parade or local
	green rating	or local centre, or	centre, or within
		between 3km and 2km	2km of a district
		of a district centre.	centre.

A catchment of 800m distance for Neighbourhood Parades and Local Centres is applied for the green assessment, aligning with similar criteria in the AMR and taking into account the more localised provision of retail offer. However, a broader catchment of 2km is applied for an amber assessment, taking a similar approach to railway stations, in that a longer walk or a short drive or cycle ride may be options people would also take.

As District Centres have a comparatively greater provision of retail services, a broader 2km catchment is applied for a green assessment. For an amber assessment, 3km catchment is applied to District Centres, taking into account a slightly longer journey. The assumptions for distances applied for this criterion is based on a number of information sources including the AMR and HSCH.

Distance from a	Not within 2km of a	Between 2km and	Within 800m of a
doctors surgery	doctors surgery	800m from a doctors	doctors surgery
		surgery	

For GP surgeries, the green rating is based on a 800m which relates to a medium walking distance or short cycle. The amber rating is based on a 2km catchment, based on a short drive or cycle. The assumptions for distances applied for this criterion is based on a number of information sources including the AMR and HSCH.

Table 1: Inputs for GIS buffer mapping

3.8. Each metric was mapped individually, then overlaid to build a detailed understanding of where concentrations of services were present. Because of the proliferation of data on the mapping (arising from the layering of a significant number of datasets), the mapping was visually challenging to decipher. As a result, a further step to condense the findings into a single overarching RAG heat map was undertaken, in order to better differentiate areas of high and low accessibility to services.



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3.9. Planning judgement was used to define the boundaries of areas of high accessibility, moderate accessibility and lower accessibility, taking account of where concentrations of services were present. The resultant heat map is set out in Figure 1 below.

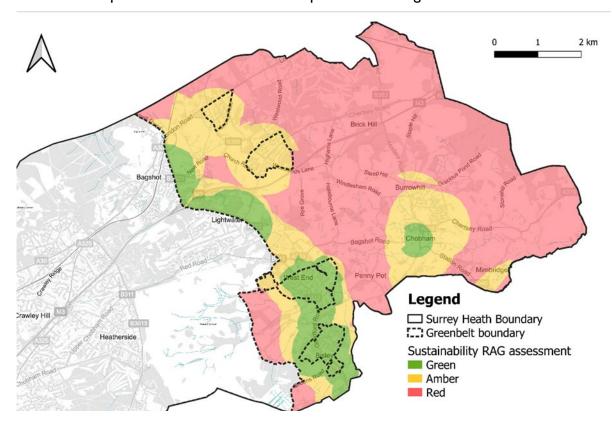


Figure 1: Sustainability Heat Map of the Surrey Heath Green Belt

- 3.10. The heat map generally confirms that land in the Green Belt is likely to be most sustainable in settlements along the course of the A322; these settlements generally benefit from a collection of bus stops from which regular services are accessible, in addition to providing good accessibility to local retail services and schools. Lightwater, Bagshot and West End benefit from doctors surgeries and both Bisley and Bagshot fall in relatively close proximity to rail services.
- 3.11. Central Chobham is also identified as having a high level of accessibility, benefitting from a range of local retail services, bus stops, a doctors surgery and a school; however these are largely concentrated in the centre of the settlement, with accessibility to services falling away with distance from the centre of the settlement. This is reflected by the limited coverage of the 'area of high accessibility' identified in Figure 1.



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3.12. Windlesham is identified as having slightly less accessibility to services than other Green Belt settlements. Here there is a lack of frequent bus services and a doctors surgery, however the settlement nonetheless benefits from a School and local centres, in addition to lying within 3km of railway stations at Bagshot and Sunningdale.



4. How the heat map for sustainability has been used

Introduction

4.1. The heat map for sustainability was used in two ways through the Study. These are set out below.

Informing the scope of the Study Area

4.2. In the early stages of preparing a methodology for the study it was noted that a finer grained assessment of Green Belt land should be undertaken; the Parcels considered through the Green Belt and Countryside Study were generally large and whilst befitting a strategic level study, the assessment findings would not provide sufficiently detailed evidence in respect of Green Belt considerations to inform decision making on where to remove land from the Green Belt, should such a step be considered necessary.

Consideration was then given as to whether the full extent of the Green Belt should be subject to a finer grained review, or whether the Study should focus on specific areas of the Green Belt. Subsequently it was decided to focus the Study upon previously developed land and on land surrounding existing Green Belt settlements. A number of factors fed into this decision, however a key consideration that led to the review taking this focus was the guidance on sustainability set out within Paragraph 142 of the NPPF and within the NPPF more widely. It was concluded to focus the Green Belt Review upon the areas of the Green Belt with greatest accessibility to services, which the heat map for sustainability identified to be the areas surrounding existing Green Belt settlements.

4.3. A full explanation of how the scope of the Study Area was defined and how land parcels for assessment were subsequently identified is set out in Paragraph 3.7 of the Green Belt Review Main Document.

Providing an understanding of the current sustainability credentials of Land Parcels within the assessment

- 4.4. In addition to helping to define the scope of the study area, it was also considered that once the boundaries of individual Land Parcels were identified, it should be recorded whether each Parcel fell within an area of high accessibility, moderate accessibility or low accessibility to services.
- 4.5. The findings of this assessment have been based on the heat map for sustainability. The boundaries of land parcels were overlaid on the heat map to determine their degree of accessibility.



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- 4.6. It should be noted that in some cases, Land Parcels did not fall within a single accessibility area, but instead fell between different areas (for example, one Parcel may fall partly within an area of high accessibility, and partly within an area of moderate accessibility). In such cases, the rating at the point of the Parcel closest to the nearest settlement was taken as the overall rating for the Parcel.
- 4.7. The results of the parcel sustainability assessment are set out in Figure 2 and are set out in tabular form at Annex 1.
- 4.8. Overall, a majority of the Parcels are considered in general terms to be located in relatively sustainable locations. This is particularly evident in Parcels around the settlements of Bisley, West End, Lightwater and Bagshot, where only a handful of Parcels on the periphery of the assessment area are identified as having a moderate level of accessibility to services.
- 4.9. Land parcels surrounding settlements at Windlesham are mostly identified as having a moderate level of accessibility to services, with some areas more distant from the centres of the settlements given a lower rating for accessibility.
- 4.10. Areas of Previously Developed Land considered through the assessment are often located within the countryside and are distant from the services provided by nearby settlements. As a result, all land parcels identified under the 'previously developed land' category are identified as having low accessibility to services, apart from PDL3 and PDL4, which are identified as having moderate accessibility to services.



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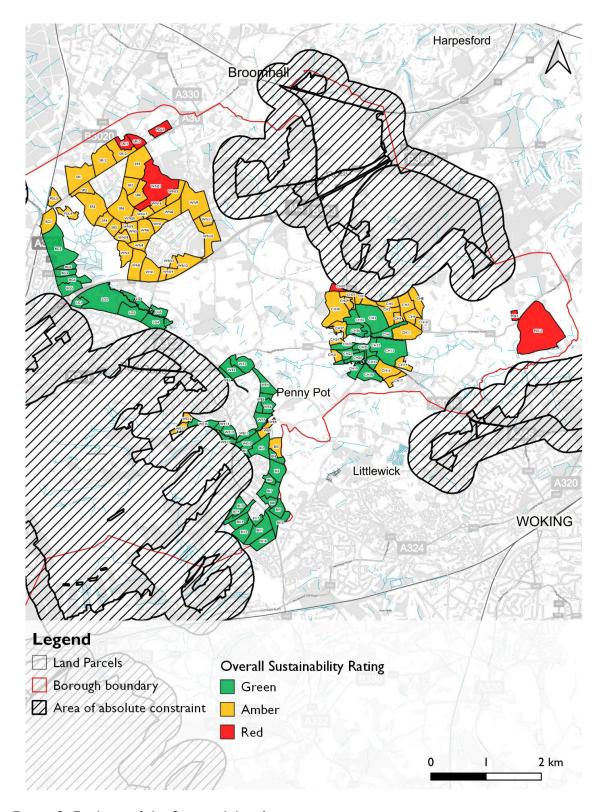


Figure 2: Findings of the Sustainability Assessment



5. Conclusion and Next Steps

Introduction

- 5.1. This document sets out how sustainability considerations have been taken into account in the production of the Green Belt Review and provides an initial Sustainability Assessment for the Parcels considered through the Review process.
- 5.2. The Green Belt Review Main Document sets out the next steps in respect of how exceptional circumstances should be considered and the further work that will need to be undertaken in the event that exceptional circumstances are identified warranting release of Green Belt land. This will not be reiterated here; the following section instead sets out how sustainability, more specifically, should be factored into the consideration of where to release Green Belt land, should such a step be considered necessary.

Next Steps

- 5.3. In the event exceptional circumstances warranting an alteration to Green Belt boundaries are identified at a strategic level, consideration will need to be given in respect of where precisely boundaries should be revised. Sustainability should be a key factor in the decision making process to which appropriate weight should be given.
- 5.4. The Sustainability Assessment set out within this document provides a good starting point in considering the potential sustainability of land being considered for release, however it is not an ultimate indication of sustainability.
- 5.5. In the event that further consideration is given in respect of the release of land from the Green Belt, it should be recognised that whilst a land parcel, or site, may not be sustainable now, development may provide an opportunity to deliver sustainability benefits, for example, by providing new on-site services or contributing to services offsite. The opportunities presented by each site or land parcel will vary significantly, taking into account size, location and viability. Such opportunities have not been examined through this Study, however if the Council does move towards considering the release of land from the Green Belt, it will be important to consider whether any deficiencies in accessibility and sustainability identified through this study could be addressed.



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5.6. In addition, consideration should be given to the sustainability benefits, or disbenefits arising from the release of multiple Parcels of land or sites. In some cases, the release of multiple parcels of land in one location may place increased pressure on existing facilities, and individual releases may not in themselves be of a sufficient scale to mitigate this pressure (for example, by providing new infrastructure to compensate). Alternatively, release of multiple parcels of land, or sites, around a settlement may unlock the provision of new infrastructure that will improve the overall sustainability of the settlement in question.



Annex I: Findings of the land parcel sustainability assessment

Ref	Name	Sustainability Level
BGI	Land at Grove End	Amber
	Land at Windlesham Golf Course, to the east of the A322 Guildford	7411001
BG2	Road	Green
BG3	Land North of Swift Lane	Green
BG4	Land to the south of Swift Lane and to the east of Guildford Road	Green
BG5	Land to the north of the M3 and to the east of the Guildford Road	Green
BG6	Land South of New Road	Green
BII	Land at Lion Park, off Church Lane	Green
BI2	Land at Hawk and Springfield Farms	Green
BI3	Land at Chobham Golf Course	Amber
BI4	Fields to the north of Church Lane	Green
BI5	Land to the south of Church Lane	Green
BI6	Woodland to the east of Clews Lane	Green
BI7	Fields south east of Clews Lane	Green
BI8	Land north west of Kiln Lane (footpath)	Green
BI9	Land south east of Kiln Lane (footpath)	Green
BIIO	Land north of the junction between Guildford Road and Limecroft Road	Green
BIII	Land at Bisley Common, north of Stafford Lake	Green
BII2	Land at Strawberry Farm	Green
BII3	Land at Miles Green Farm	Green
BII4	Common Land and housing north west of Queens Road, at Miles Green	Green
BII5	Land at Ramsbrook Farm	Green
BII6	Land at Bisley Common, south of Stafford Lake	Green
BII7	Land at Jopling Road	Green
CHI	Land at Oakhurst	Amber
CH2	Land North of Burr Hill Lane and East of Delta Road	Amber
CH3	Land between Windsor Road and Delta Road	Green



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CH4	Land east of Brookleys	Amber
CH5	Land west of Mincing Lane	Amber
CH6	Land east of High Street and south of Chertsey Road	Green
CH7	Land at the Avenue	Amber
CH8	Land north east of The Avenue	Amber
СН9	Land to the north of Chertsey Road	Amber
CHI0	Land to the west of Chobham Park Lane	Amber
CHII	Land to the south of Chertsey Road, Chobham	Amber
CHI2	Land east of High Street and north Station Road	Green
CH13	Land at Chobham Meadows and Flexlands Farm	Green
CHI4	Land North of Sandpit Hall Road	Amber
CH15	Land at Chobham Recreation Ground	Green
CH16	Land south of Station Road and north west of Broadford Lane Path	Amber
CH17	Land South of Station Road and South East of Broadford Lane Path	Amber
CH18	Land South East of Castle Grove Road	Green
CH19	Land North West Castle Grove Road	Green
CH20	Land West of Castle Grove, North of the Bourne	Green
CH21	Land South of Vicarage Road	Amber
CH22	Land at Chobham Park Farm	Green
CH23	Land North of Vicarage Road	Green
CH24	Land South of the Millbourne, East of Clappers Lane	Amber
CH25	Land west of the High Street, South of Bagshot Road	Green
CH26	Land West Windsor Road, South of Leslie Road	Green
CH27	Land to the north of the Millbourne	Amber
CH28	Land North of Leslie Road at Leslie Farm and Burrow Hill Nurseries	Amber
CH29	Land South of Windlesham Road and West of Windsor Road	Amber
CH30	Land North of Windlesham Road	Red
CH31	Land west of Windsor Road, south of Windlesham Road	Amber
CH32	Land west of Windsor Road incorporating Leslie Road	Green
LGI	Land to the south of the M3 and to the north east of Guildford Road	Green
LG2	Land at Windlesham Arboretum	Green



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LG3	Land to the north west of Broadway Road and to the north east of the A322 Guildford Road	Green
LG4	Land to the south east of Broadway Road and north east of the A322 Guildford Road	Green
LG5	Land at Broadway Green and Windlebrook Farms	Green
LG6	Land South of Oldhouse Lane	Green
PDLI	Chobham Business Centre	Red
PDL2	Fairoaks Airport	Red
PDL3	Longacres Garden Centre	Amber
PDL4	Hall Grove School and Industrial Estate	Amber
PDL5	Hilliers and Windlesham Garden Centres	Red
SRI	Land to the north of the A30 London Road and to the west of the B3020 Sunninghill Road	Amber
SR2	Woodland south of A30 London Road	Amber
SR3	Land at Windlesham Golf Course, south west of School Road	Amber
SR4	Land to the south west of School Road	Amber
SR5	Land to the south west of School Road and to the west of Church Road	Amber
SR6	Land to the south east of Snows Ride and to the north east of School Road	Amber
SR7	Land at Snows Ride Farm	Amber
SR8	Land to the north east of Hatton Hill	Amber
SR9	Land to the south of the A30 London Road and west of Snows Ride	Amber
SR10	Woodland north east of Windlesham Hall	Red
SRII	Land at Windlesham Hall	Red
SR12	Woodland south west of Windlesham Hall	Amber
SR13	Land to the north of the A30 London Road and to the east of the B3020 Sunninghill Road	Amber
WEI	Land South west of Benner Lane	Green
WE2	Land to the north of the junction between Benner Lane and Fairfield Lane	Green
WE3	Land between Fairfield Lane and Bagshot Road	Green
WE4	Land south east of Fairfield Lane	Green
WE5	Woodland to the east of the West End Reserve Site	Green
WE6	Land to the north of Beldam Bridge Road	Green
WE7	Land at Beldam Bridge Farm	Green



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WE8	Woodland south east of the Bourne	Amber
WE9	Open fields to the south of Oldhouse Lane	Amber
WEI0	Land south of Oldhouse Lane and east of Guildford Road	Green
WEII	Land to the south of the Bourne and to the east of Guildford Road	Green
WEI2	Land between Lucas Green Road and Guildford Road, north of the Bourne	Green
WEI3	Land between Lucas Green Road and Guildford Road, south of the Bourne	Green
WE14	Field between Fenns Lane and Lucas Green Road	Green
WE15	Land at Fenns Farm and Rosedene Farm	Green
WE16	Land at Rounce Farm, west of Fenns Lane	Amber
WE17	Fields north of Trulley Brook	Amber
WNI	Land south west of the junction between Church and Broadway Roads	Amber
WN2	Land south east of the junction between Church Road and Rectory Lane	Amber
WN3	Land south west of the junction between Church Road and Rectory Lane	Amber
WN4	Land between Church Road and Pound Lane	Amber
WN5	Land south of Kennel Lane	Amber
WN6	Land between Kennel Lane and Pound Lane	Amber
WN7	Land at the Field of Remembrance	Amber
WN8	Land south of Westwood Road	Amber
WN9	Land between Westwood Road and Chertsey Road	Amber
WNI0	Land at Heathpark Wood (beyond the housing reserve site)	Amber
WNII	Land at Oakwood	Amber
WN12	Land south of Woodlands Lane and north west of the M3	Amber
WN13	Land south of Broadley Green	Amber
WN14	Land east of Broadway Road	Amber
WN15	Residential properties to the north of Westwood Road	Amber
WN16	Woodland to the north of Westwood Road	Amber
WN17	Land to the east of the junction between Hatton Hill and Kennel Lane	Amber
WN18	Land north east of Church Road	Amber
WN19	Land south east of the Junction between Church Road and Kennel Lane	Amber



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WN20	Land west of the junction between Kennel Lane and Hatton Hill	Amber
WN2I	Wooded land between Snows Ride and Windlesham	Red

6. It is recognised that there could be a range of factors that could be considered to determine potential improvements to the sustainability of a given area or site. It is noted, for example, that there is potential for the sustainability of a site to be improved by site design and/or contributions towards sustainable modes of transport. However, it is not considered that assessing the potential future sustainability of a site is possible as part of this study due to the high degree of uncertainty as to how a site might come forward as a development proposal. It is none the less recognised that any forthcoming development proposals could take a number of different steps to improve the sustainability of a site.

