



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

## Green Belt Review

### Main Document



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Surrey Heath Borough Council  
Knoll Road, Camberley GU15 3HD  
[Planning.consultation@surreyheath.gov.uk](mailto:Planning.consultation@surreyheath.gov.uk)



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## 1. Introduction

### A new Local Plan for Surrey Heath

- 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.
- 1.2. In developing the new Local Plan, it is essential that the Council can 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). This document forms part of that evidence base.

### Background to the Study

- 1.3. Over 44% of land within Surrey Heath is designated as Metropolitan Green Belt (see Figure 1). As a strategic policy of land use constraint covering nearly half of the Borough, this designation is a key consideration in the development of the new Local Plan, particularly as the Council gives consideration as to the degree to which the emerging Plan is able to meet identified needs in a way that is consistent with the policies of the NPPF.
- 1.4. In 2017, Surrey Heath Borough Council undertook a high-level appraisal of how the Green Belt and countryside beyond the Green Belt within Surrey Heath was functioning against purposes 1 – 4 of the Green Belt as set out within Paragraph 138 of the NPPF. The Green Belt and Countryside Study<sup>1</sup> concluded that whilst nearly all of the Green Belt and countryside beyond the Green Belt within the borough functioned against the purposes of the Green Belt as set out within the NPPF, there are some areas which did not function, or did not function well against the purposes of the Green Belt.

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<sup>1</sup> Available at:

<https://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/LocalPlan/EvidenceBase/greenbeltcountrysidestudy2017.pdf>



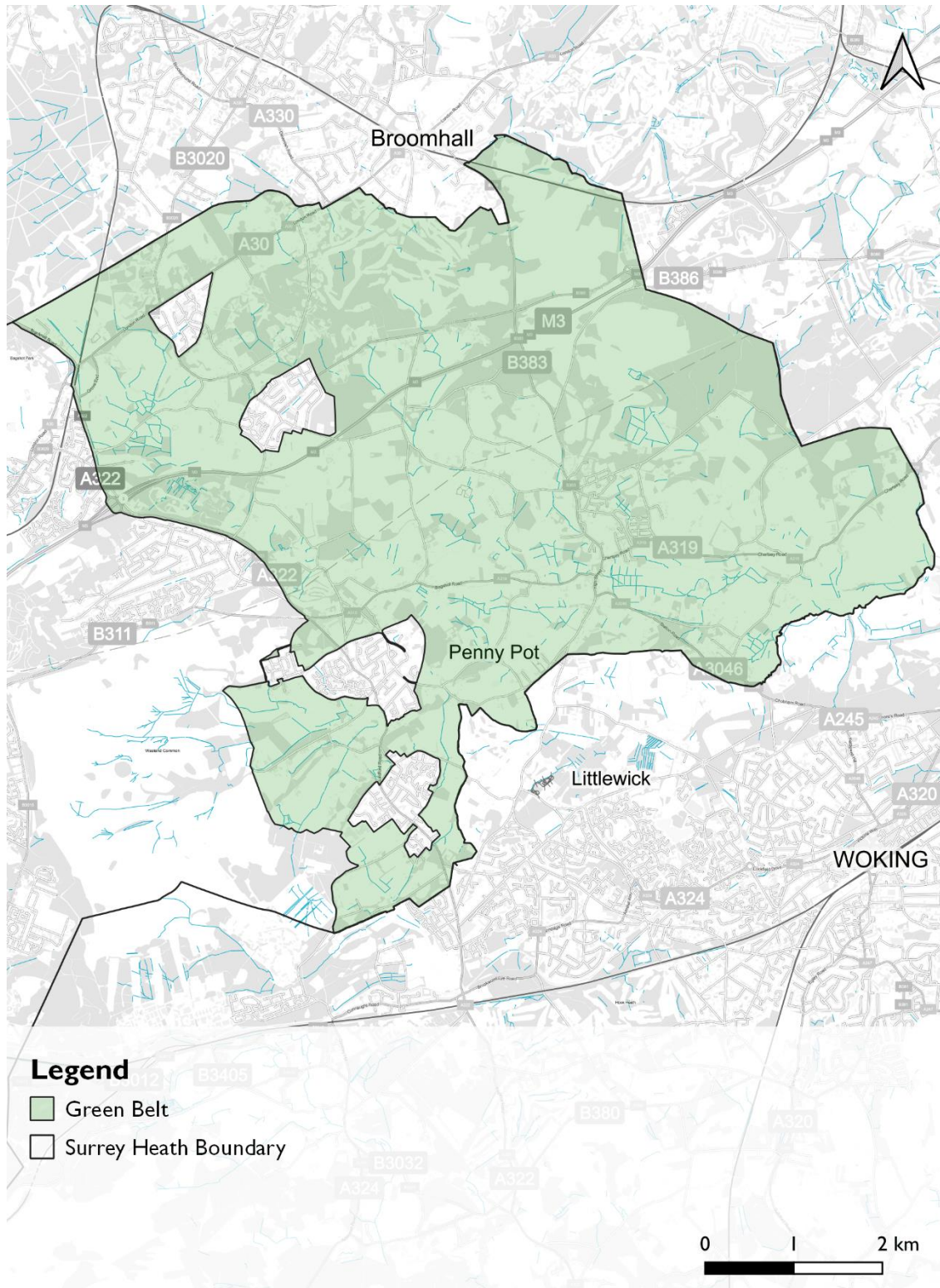


Figure 1: Extent of the Green Belt within Surrey Heath



- 1.5. In 2018, Land Use Consultants (LUC) undertook an independent appraisal of potential housing sites outside of Surrey Heath's defined settlement areas, including those situated within the Green Belt and the countryside beyond the Green Belt. The Surrey Heath Sites Appraisal<sup>2</sup> did not set out if sites should be released from the Green Belt, nor did it identify 'exceptional circumstances' for the release of land from the Green Belt. The study was part of the evolving evidence base to assist with the preparation of the Local Plan and the decision-making process and sought to support the development of the Draft Local Plan Issues and Options Consultation.

### The Green Belt in plan-making to date

- 1.6. In May 2018 the Council consulted on a Regulation 18 Draft Local Plan Issues and Options document, which was underpinned by a range of evidence-based documents, including those cited above. At the time of the consultation, the Council did not consider that there were exceptional circumstances to warrant an alteration to Green Belt boundaries. This was because:
- The Council had demonstrated that it was able to meet the majority of its total housing need figure within settlement areas, on previously developed land and in sustainable locations within the countryside beyond the Green Belt, without recourse to Green Belt land;
  - Hart District Council had capacity to meet the remainder of Surrey Heath's housing need in line with Paragraph 141 of the NPPF; and,
  - The Council considered that it was able to meet all other identified needs on land outside of the Green Belt.
- 1.7. However, following the Regulation 18 Draft Local Plan Issues and Options consultation, subsequent changes to housing need figures and site availability/capacity work identified that the Council could have a further shortfall against its housing figure.
- 1.8. Work has been undertaken separately to identify opportunities to deliver the Borough's housing needs sustainably without recourse to the Green Belt. Should further capacity work be unable to identify sufficient deliverable or developable sites capable of meeting the Council's housing needs sustainably in locations outside of the Green Belt, it is recognised that high level exceptional circumstances may exist to warrant an alteration to Green Belt boundaries.

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<sup>2</sup> Available at: <https://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>



- 1.9. It is recognised that if high level exceptional circumstances warranting an alteration to Green Belt boundaries are subsequently identified, the Green Belt evidence collected by the Authority to date is not considered sufficient to enable the Council to make robust decisions on where land should be released.
- 1.10. Although the Green Belt and Countryside Study 2017 offers a useful overview of how well non-urban land within Surrey Heath functioned at that time against the purposes of the Green Belt as defined in the NPPF, the study was undertaken at a strategic level and stops short of providing any indication on the level of harm that could arise to the wider Green Belt if land is released. It is also noted that, the Surrey Heath Sites Appraisal 2018 related to sites identified within the Surrey Heath Strategic Land Availability Assessment 2017<sup>3</sup>; as a result, the study is considered out of date.

### Purpose of this Study

- 1.11. In view of the limitations to the existing studies as set out above, it is recognised that further, up-to-date and more detailed evidence is required to enable the Council to fully understand how the Green Belt within Surrey Heath functions and what the implications will be for the wider Green Belt in the event that land is released from its extent. This Review will provide this evidence, which will be considered in conjunction with other background evidence to conclude on whether there are exceptional circumstances to warrant an alteration to Green Belt boundaries at both high level and local levels.
- 1.12. For clarity, this work does not in itself identify land that could be released from the Green Belt; this will be addressed through other evidence-based studies, if necessary. Similarly, this study does not commit the Council to revising Green Belt boundaries; it is recognised that an evolving evidence base may identify that there are no identifiable exceptional circumstances at macro and/or micro levels. For example, if further land is identified as available and deliverable within sustainable settlement areas, countryside locations or on previously developed land (which is capable of being supported by suitable SANG), the Council may conclude that exceptional circumstances do not exist to warrant Green Belt boundary changes.

### Structure of the Review

- 1.13. The Green Belt Review comprises two documents. The first is this, the Green Belt Review Main Document, which comprises the following:
  - a) A review of relevant Policy and Practice (Section 2);

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<sup>3</sup> Available at: <https://www.surreyheath.gov.uk/SLAA>



- b) A discussion of the Assessment Methodology (Section 3). This section sets out:
- How the extent of the study area was defined;
  - How land parcels within the Green Belt were identified for assessment;
  - How land parcels were assessed against the Green Belt purposes as set out in the NPPF; and,
  - The methodology used to identify the impact that the release of parcels would have upon the wider Green Belt in the event that they were released.
- c) Findings of the Study (Section 4).
- d) Next Steps (Section 5)

1.14. A Green Belt Review Sustainability Assessment accompanies the Main Document and should be read in conjunction with it. The Sustainability Assessment sets out the following:

- How a heat map for the sustainability of the Green Belt was developed;
- How sustainability considerations informed the scope of the study area considered through the Green Belt Review;
- A Sustainability Assessment of land parcels.





## 2. Review of relevant Policy and Practice

### The historic policy context of the Green Belt

2.1. The Metropolitan Green Belt was first established by Patrick Abercrombie within the Greater London Plan of 1944, in response to a programme of urban expansion. Although initially conceived as a relatively narrow band of public parks around London, the Metropolitan Green Belt became a greater reaching strategic policy of land use constraint designed to contain urban growth. A series of Circulars and guidance notes were published to encourage Local Authorities to designate Green Belts, setting down at a national level what a Green Belt should achieve and how local authorities should designate and preserve them. An initial Circular, 42/55, recommended that Planning Authorities consider whether to establish Green Belts in their areas in order to:

- Check the further growth of a large built up area;
- Prevent neighbouring settlements from merging into one another; or,
- Preserve the special character of a town.

2.2. The initial Circular invited Planning Authorities wishing to establish Green Belt in their areas to submit a sketch plan to the Minister of Housing and Local Government indicating approximate boundaries for the Belt.

2.3. Recognising that several sketch plans had been received and considered by the Minister of Housing and Local Government, a subsequent Circular, 50/57, confirmed that Authorities could now proceed with the formal definition of Green Belt boundaries in Development Plans. The Circular set out in greater detail how boundaries should be defined, advising that boundaries should follow the lines of features that can be recognised on the ground and that pockets of land around towns should be omitted from the Green Belt with the purpose of being developed at a later date without prejudice to the Green Belt. Circular 50/57 also gave an indication of how villages within the Green Belt should be addressed, indicating:

*“Where it is proposed to allow no new building at all, the Green Belt notation can be simply carried across the settlement. Where it is proposed to allow ‘infilling’ but no extension of a settlement and the form of the present settlement is such that it is clear what infilling would imply, the Green Belt notation can simply be carried across the settlement....the need to map the limits for development of a settlement is likely to arise only where the authority propose to allow some limited measure of expansion, or where the existing development is scattered and the authority consider it necessary to in the Plan their precise intentions”*



- 2.4. A later Circular, 14/84, recognised that detailed Green Belt boundaries were starting to be established or revised through Local Plans and endeavoured to provide advice on their definition. In particular, the Circular clarified that detailed Green Belt boundaries should endure well beyond the plan period and should only be altered in exceptional circumstances.
- 2.5. In 1988, the Government replaced all preceding Circulars with Planning Policy Guidance Note 2: Green Belts. PPG2 expanded upon many of the themes 6 addressed in the preceding guidance. It also introduced some subtle changes in emphasis to the existing purposes of the Green Belt and added two further purposes of the Green Belt. The resulting five purposes of the Green Belt were to:
- Check the unrestricted sprawl of large built-up areas;
  - Prevent neighbouring towns merging into one another;
  - Assist in safeguarding the countryside from encroachment;
  - Preserve the setting and special character of historic towns; and
  - Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.6. PPG2, whilst amended in 1995 and 2001, provided a largely unaltered Policy framework for Green Belts for the following 23 years.
- 2.7. In March 2012, the Government introduced the National Planning Policy Framework (NPPF), replacing and consolidating all Planning Policy Statements and Planning Policy Guidance Notes, including PPG 2, into a single document. The NPPF has been updated three times since its inception, first in 2018 and subsequently in 2019 and 2021. The 2021 version of the NPPF provides up to date policy in respect of Green Belt and is summarised below.

## The Green Belt in the National Planning Policy Framework (NPPF)

- 2.8. Government policy on the Green Belt is set out in Chapter 13 of the adopted National Planning Policy Framework (NPPF) Protecting Green Belt Land. Paragraph 137 of the NPPF indicates that the government attaches “great importance” to Green Belts and states “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.
- 2.9. This is elaborated in NPPF paragraph 138, which states that Green Belts serve five purposes, as set out below:



- To check the unrestricted sprawl of large built-up areas.
  - To prevent neighbouring towns merging into one another.
  - To assist in safeguarding the countryside from encroachment.
  - To preserve the setting and special character of historic towns.
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.10. The NPPF emphasises in paragraphs 139 and 140 that local planning authorities should establish and, if justified, only alter Green Belt boundaries through the preparation of their Local Plans. It goes on to state 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. Strategic policies should establish the need for any changes to Green Belt boundaries having regard to their intended permanence in the long term, so they can endure beyond the plan period.”
- 2.11. When defining Green Belt boundaries NPPF paragraph 143 states local planning authorities should:
- demonstrate consistency with Local Plan strategy, most notably achieving sustainable development;
  - not include land which it is unnecessary to keep permanently open;
  - safeguard enough non-Green Belt land to meet development needs beyond the plan period;
  - demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
  - define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 2.12. Current planning guidance makes it clear that the Green Belt is a strategic planning policy constraint designed primarily to prevent the spread of built development and the coalescence of urban areas. The NPPF goes on to state “*local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land*” (paragraph 145).



- 2.13. It is important to note, however, that these positive roles should be sought for the Green Belt once designated. The lack of a positive role, or the poor condition of Green Belt land, does not necessarily undermine its fundamental role to prevent urban sprawl by keeping land permanently open. Openness is not synonymous with landscape character or quality.
- 2.14. The NPPF's Green Belt policies are supplemented by National Planning Practice Guidance (PPG). The guidance sets out some of the factors that should be taken into account when considering the potential impact of development on the openness of Green Belt land. The factors referenced are not presented as an exhaustive list, but rather a summary of some common considerations borne out by specific case law judgements.
- 2.15. The guidance states openness can have both spatial and visual aspects. Other circumstances which have the potential to affect judgements on the impact of development on openness include the duration of development and its remediability to the original or to an equivalent (or improved) state of, openness and the degree of activity likely to be generated by development, such as traffic generation.
- 2.16. The guidance also elaborates on paragraph 142 of the NPPF which requires local planning authorities to 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 the remaining Green Belt land. The guidance endorses the preparation of supporting landscape, biodiversity or recreational need evidence to identify appropriate compensatory improvements, including new or enhanced green infrastructure, woodland planting, landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal), improvements to biodiversity, habitat connectivity and natural capital, new or enhanced walking and cycle routes and improved access to new, enhanced or existing recreational and playing field provision.
- 2.17. Finally, the guidance offers some suggested considerations for securing the delivery of identified compensatory improvements – the need for early engagement with landowners and other interested parties to obtain the necessary local consents, establishing a detailed scope of works and identifying a means of funding their design, construction and maintenance through planning conditions, section 106 obligations and/or the Community Infrastructure Levy.



## Planning Advisory Service Guidance

- 2.18. Neither the NPPF nor PPG provide guidance on how to undertake Green Belt assessments. However, the Planning Advisory Service (PAS) have published an advice note<sup>4</sup> that discusses some of the key issues associated with assessing the Green Belt.
- 2.19. The PAS Guidance considers the way in which the five purpose of Green Belt should be addressed, as follows:
- Purpose 1: To Check the Unrestricted Sprawl of large built-up areas – this should consider the meaning of the term ‘sprawl’ and how this has changed from the 1930s when Green Belt was conceived.
  - Purpose 2: To Prevent Neighbouring Towns from merging into one another - assessment of this purpose will be different in each case and a ‘scale rule’ approach should be avoided. The identity of a settlement is not determined just by the distance to another settlement; instead, the character of the place and the land between settlements must be acknowledged.
  - Purpose 3: To assist in safeguarding the countryside from encroachment - the most useful approach for this purpose is to look at the difference between the urban fringe and open countryside. As all Green Belt has a role in achieving this purpose, it is difficult to apply this purpose and distinguish the contribution of different areas.
  - Purpose 4: Preserving the Setting and Special Character of Historic Towns – this applies to very few places within the country and very few settlements in practice. In most towns, there are already more recent development between the historic core and the countryside.
  - Purpose 5: To assist in urban regeneration by encouraging the recycling of derelict and other urban land – the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. The value of various land parcels is unlikely to be distinguished by the application of this purpose.
- 2.20. It also states that the assessment of the performance of Green Belt should be restricted to the Green Belt purposes and not consider other planning considerations, such as landscape, which should be considered in their own right as part of the appraisal and identification of sustainable patterns of development.

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4 Available at: <https://www.local.gov.uk/sites/default/files/documents/green-belt-244.pdf>



## Case Law and Local Plan Examinations

- 2.21. It is also considered appropriate that relevant Inspector's reports from the Independent Examination of Local Plans by the Planning Inspectorate and case law should be used to inform the approach used in the Green Belt Review. The following section sets out the guidance of most relevance to the study:
- Green Belt studies should be “fair, comprehensive and consistent with the Core Strategy’s aim of directing development to the most sustainable locations”. Green Belt reviews should be ‘comprehensive’ rather than ‘selective’<sup>5</sup>.
  - Green Belt studies should make clear “how the assessment of ‘importance to Green Belt’ has been derived” from assessments against the individual purposes of Green Belt<sup>6</sup>. Such assessments against the purpose should form the basis of any justification for releasing land from the Green Belt<sup>7</sup>.
  - Openness and permanence are key considerations in terms of Green Belt; and are therefore integral to the assessment of Green Belt across all Purposes<sup>8</sup>.
  - Openness should be considered not only in terms of the extent of the built form but also has a visual aspect<sup>9</sup>. However, openness does not imply freedom from all forms of potential development and visual impact is not an obligatory consideration when assessing Green Belt openness<sup>10</sup>.
  - Green Belt should be assessed against the Purposes set out in NPPF and, if any purpose is to be excluded, there must be a robust rationale. Any methodology must clearly set out how the Purposes have been interpreted and should respect the local context, for example in relation to the definition of key terms are therefore integral to the assessment of Green Belt across all Purposes<sup>11</sup>.
  - Detailed Green Belt assessment does not need to be carried out for land covered by major policy constraints, for example flood zone 3b or sites of international or

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<sup>5</sup> Inspector’s report (A Thickett) to Leeds City Council (September 2014).

<sup>6</sup> Inspectors’ Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015)

<sup>7</sup> Inspector’s interim findings (H Stephens) to Durham City Council (November 2014)

<sup>8</sup> Inspector (Mel Middleton), Note – Green Belt Review, Independent Examination of the Welwyn Hatfield (December 2017).

<sup>9</sup> Heath & Hampstead Society v Camden LBC & Vlachos (2008) and Turner v Secretary of State for Communities and Local Government & East Dorset District Council (2016)

<sup>10</sup> In February 2020 the Supreme Court overturned the Court of Appeal Ruling on the case of Sam Smith v North Yorkshire County Council and Darrington Quarries Ltd (2018)

<sup>11</sup> Inspector (David Smith), Report to the Council of the London Borough of Redbridge, Report on the Examination of the Redbridge Local Plan 2015-2030 (24 January 2018)



national nature conservation importance, which would preclude development in any case<sup>12</sup>.

- In reviewing land against the purposes, Green Belt studies should consider the reasons for a Green Belt's designation as they are related to the purposes<sup>13</sup>.
- 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<sup>14</sup>.
- When demonstrating exceptional circumstances, Councils should consider the Calverton case namely assessing:  
*“The acuteness/intensity of the objectively assessed need (matters of degree may be important);  
the inherent constraints on supply/availability of land prima facie suitable for sustainable development;  
(On the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;  
the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and  
the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.”*<sup>15</sup>
- When setting out exceptional circumstances for release Councils need to demonstrate these at both a strategic and local level<sup>16</sup>.
- What is deemed to be an exceptional circumstance is a matter for rational planning judgement and this will "almost inevitably be an analysis of the nature and degree of the need, allied to a consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy<sup>17</sup>.

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<sup>12</sup> Inspector (Mel Middleton), Note – Green Belt Review, Independent Examination of the Welwyn Hatfield, (December 2017)

<sup>13</sup> Inspector's interim findings (H Stephens) to Durham City Council (November 2014)

<sup>14</sup> Inspectors' Letter (L Graham) to Cambridge City and South Cambridgeshire Councils (May 2015)

<sup>15</sup> Calverton Parish Council vs Nottingham City Council, High Court of Justice Ruling (2015)

<sup>16</sup> Inspector (Jonathan Bore) Examination of the Guildford Borough Local Plan: Strategy and Sites, Inspector's Questions and Comments (No. 1) (23 March 2018)

<sup>17</sup> Ouseley J in Compton PC v. Guildford BC & SSHCLG (2019)



- In line with the NPPF, there is a need to ensure the assessment takes into account the need to first give consideration to land which has been previously developed and/or is well served by public transport<sup>18</sup>.
- There is a need to ensure that the Green Belt provides enough granularity for all relevant scales of development to be considered. In the case of the St Albans Local Plan, the Inspectors considered the development strategy put forward to be unsound, in part because smaller scale sites of land that made a weaker contribution to the Green Belt purposes study were excluded from the more detailed Green Belt review. Overall concern was expressed that there was a focus on only strategic sites, with a need for a finer grain Green Belt Review<sup>19</sup>.
- When setting out the opportunities for enhancing the remaining Green Belt, Councils should demonstrate that the proposals are deliverable and that the costs for their implementation have been factored into the viability of proposed allocations<sup>20</sup>.

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<sup>18</sup>Inspector's letter (Louise Crosby and Elaine Worthington) St Albans Local Plan Examination (14 April 2020)

<sup>19</sup> Inspector's letter (Louise Crosby and Elaine Worthington) St Albans Local Plan Examination (14 April 2020)

<sup>20</sup> Inspector (Katie Child) Rossendale Local Plan Examination (2019) and Inspector's letter (Louise Crosby and Elaine Worthington) St Albans Local Plan Examination (2020)





### 3. Assessment Methodology

#### Introduction

- 3.1. The overriding purpose of this Study is to identify how the Green Belt within Surrey Heath functions and what the implications could be for the wider Green Belt in the event that land is released from its extent.
- 3.2. In the absence of an established methodology for undertaking such a study, Surrey Heath has developed a bespoke methodology. This methodology has been developed with regard had to national policy and guidance, the experiences of other Local Authorities, local circumstances and the approaches taken to appraising the performance of Green Belt (where applicable) in neighbouring Boroughs. The methodology is intended to ensure consistency in how the assessment is undertaken across the study area.
- 3.3. The methodology comprises two parts. Part 1 gives consideration to how specific areas of the Green Belt within Surrey Heath function against the purposes of the Green Belt as set out in the National Planning Policy Framework (NPPF). This part of the assessment is comparable to the assessment made within the 2017 Green Belt and Countryside Study but will provide a finer grained assessment of land within Surrey Heaths Green Belt, using an updated methodology.
- 3.4. Part 2 gives consideration to how the release of areas of Green Belt land could impact upon the integrity of the wider Green Belt. The following section discusses the assessment methodology used in detail.
- 3.5. Together, the findings of Part 1 and Part 2 will enable the Council to develop an understanding of the degree of harm that would arise to the Green Belt in the event that land is released from its extent.

#### Identifying the scope of the Study Area

- 3.6. The full extent of the Green Belt and the countryside beyond the Green Belt within Surrey Heath was assessed within the Green Belt and Countryside Study (GBCS) 2017, as appropriate to a strategic study. However, it is not considered that the GBCS alone is sufficient to enable the Council to draw to robust conclusions as to where Green Belt boundary revisions should be made, in the event that it is determined that there are exceptional circumstances to warrant such an alteration. This Study will address this deficit by providing a finer grained study of how land within the Borough performs against the Green Belt purposes and how the integrity of the Green Belt could be affected in the event its boundaries were to be revised.



3.7. In view of the purpose of the Study, consideration was given as to whether the full extent of the Surrey Heath Green Belt should be subject to a finer grained review, or whether a more focused approach should be adopted. It was concluded that a more focused Study, limited to consideration of previously developed land and land around settlements would be more appropriate for the following reasons:

- Paragraph 142 of the National Planning Policy Framework sets out 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.
- Paragraph 142 of the NPPF also indicates that land well-served by public transport should also be given early consideration. In line with Paragraph 142, a Green Belt Sustainability Study undertaken alongside this work confirmed that land adjacent to the Boroughs Green Belt settlements generally provided the most sustainable locations within the Green Belt in respect of both transport and other services.
- Green Belt land comprising previously developed land and land adjacent to settlements is more likely to be under a degree of urban influence when compared to other open Green Belt land. It is prudent to consider Green Belt land under greater urban influence first; harm arising from Green Belt release is likely to be higher where there is currently no urban influence.
- Undertaking a finer grained review of the full extent of the Green Belt is likely to give rise to an overly complex study which would be difficult to understand and would make it challenging to draw to robust conclusions.
- Such an approach is comparable to approaches taken by many other Green Belt Studies which have been considered as robust at Examination in Public, including Runnymede Borough Council, which adjoins Surrey Heath to the east.

3.8. The approach to identifying specific areas of previously developed land and land around settlements for assessment is set out below.

### Identifying land around settlements

3.9. As a starting point, Surrey Heath identified an indicative 400m assessment buffer around all settlements which:

- Are inset within (excluded from) the Surrey Heath Green Belt;
- Benefit from a defined settlement boundary but are otherwise washed over by the Green Belt designation;
- Adjoin the Borough's Green Belt.



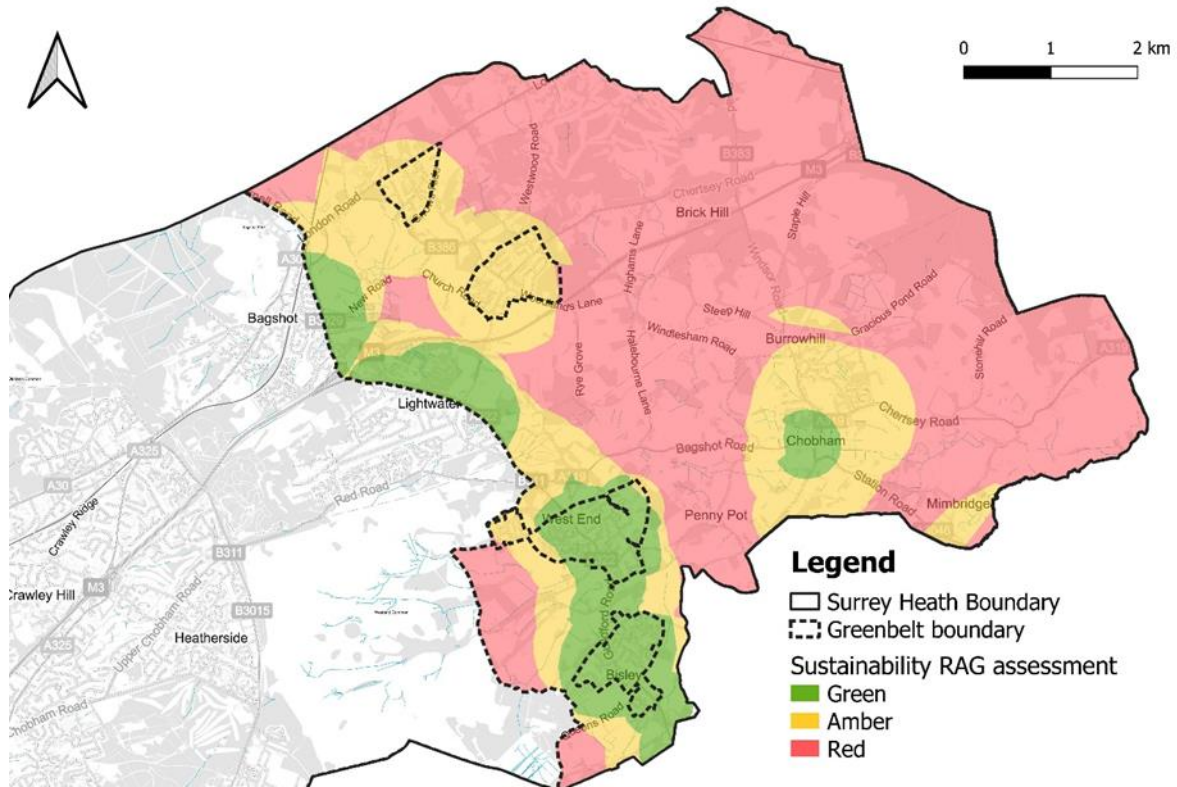
3.10. At 400m, the extent of the indicative assessment zone was guided by both a desire for consistency with the approach adopted by Runnymede and also took account of local circumstances; a relatively narrow buffer of 400m was perceived to recognise the relatively narrow gaps between settlements within and surrounding the Surrey Heath Green Belt and was considered to reflect the likely maximum extent of sustainable development. Beyond 400m, the sustainability of land is likely to drop off (see Figure 2), which could have an adverse effect on the integrity of the Green Belt. Similarly, wider buffers would mean that the risk of harm to the wider Green Belt would be likely to increase and would on a practical basis, risk a significant degree of duplication with the 2017 Study. In view of this, a 400m buffer was drawn around the following settlements:

- Bagshot;
- Bisley;
- Chobham;
- Lightwater;
- West End;
- Windlesham; and,
- Windlesham (Snows Ride).

3.11. For Chobham, which benefits from a defined settlement area but is otherwise ‘washed over’ by the Green Belt designation, it was considered appropriate to also include Green Belt land falling inside of the settlement area within the assessment, for robustness.

3.12. There are a number of settlements which are adjacent to the Surrey Heath Green Belt, but outside of the Surrey Heath Borough boundary, namely the areas of Woking and Sunningdale. The Council did not consider it appropriate to assess parcels of land adjoining these settlements at this stage in the Local Plan process, as land in these areas would be subject to duty-to-co-operate discussions as part of the Local Plan process and would not follow the Council’s general preferred approach of directing development to its own settlements.





**Figure 2: Overarching results of Sustainability Assessment of Green Belt land**

### Defining boundaries of parcels for assessment within and around settlements

- 3.13. To facilitate an effective study where relative performance of areas of Green Belt land could be clearly distinguished at a finer grain, it was considered appropriate to break land within the identified assessment zone into smaller parcels.
- 3.14. The process of defining the boundaries of the sub-areas was undertaken in line with the general principles used to identify the parcels in the 2017 Green Belt and Countryside Study. This was to identify boundaries of land parcels using permanent man-made and natural features that were visually discernible and unlikely to change in the long term. This approach however, whilst suitable to identify parcels of a size commensurate to a strategic level study, would in itself be ineffectual at drawing out differences in the performance of different areas of land on the finer-grained basis required for this study.
- 3.15. As such, a range of smaller-scale features and boundaries have been used to identify smaller parcels of Green Belt land within the original strategic parcels from the 2017 Study, including but not limited to:



- unclassified public roads and private roads;
- footpaths;
- smaller watercourses;
- well established woodland edges and field boundaries;
- property boundaries; and,
- existing development with strongly established boundaries.

3.16. In identifying parcels for assessment, it was recognised that some areas may feature many such boundaries in close proximity; using these to define a range of very small parcels would be unlikely to reveal any significant variation between areas of land. Likewise, it was noted that some areas could be devoid of any such features, which could lead to the identification of overly large parcels not commensurate to a study at this scale. In other cases, suitable boundary features were found to lie within the first 200m of the assessment zone, or beyond the 400m extent. Taking these challenges in parcel definition into account, the definition of parcels for assessment ultimately relied upon planning judgement, however the following principles were developed in advance of the parcelling exercise to help guide and bring a degree of consistency to the process:

- Where many elements could be used to identify parcel boundaries within close proximity (leading to the identification of many, very small parcels), the identification of parcels under 2ha will be avoided. Officers consider 2ha to be a reasonable and appropriate minimum parcel size. Any parcels under 2ha in size will be amalgamated into an adjacent parcel.
- Where there is an absence of boundary features within the 400m assessment zone, regard will be had to the presence of boundary features beyond the assessment zone. Where suitable features lie just beyond the assessment zone that can be used to identify a robust boundary for a parcel, these will be used instead. Where no features of any degree exist, or lie significantly beyond the assessment zone, planning judgement will be used to identify parcel boundaries. Ultimately, in cases where no features exist inside or in a reasonable distance outside of the assessment zone, the outer boundary of the buffer itself will be used to mark the boundary of the parcel in question.
- Where a clear, easily identifiable and strong boundary (for example a motorway or train line) lies inside of the 400m assessment zone, within approximately 100m of the zones edge, no parcel will be identified beyond this boundary.
- Where a parcel would cross into an adjoining authority area, the Borough boundary will be used to define the outer parcel boundary, unless alternative tangible features are present which can be used to define the limits of the parcel, inside the Surrey



Heath boundary. It is not considered appropriate to assess land falling within an adjoining Borough.

- Where land is subject to an absolute constraint, it will be excluded from further assessment. For the purposes of the assessment, absolute constraints have been aligned with those set out in the Strategic Land Availability Assessment (SLAA)<sup>21</sup>. In the event that an absolute constraint encircles an area of land, the encircled land will be excluded from assessment.
- Where an absolute constraint severs land within the assessment zone from the adjoining settlement the land in question will generally not be subject to assessment.
- Where the approach to identifying parcels leaves a narrow area between settlements under 200m, the land in question will be incorporated into the assessment for completeness.

- 3.17. The boundaries of parcels were initially identified through desk-based assessments of publicly available data, including aerial photography, Ordnance Survey maps, 'birds' eye' views and Google Earth, with parcels subsequently refined to take account of the local context. For consistency, the parcels were drawn by one individual, before being taken through a check and challenge exercise with other planning professionals.

## Previously Developed Land

- 3.18. In line with Paragraph 142 of the NPPF, the Council has also sought to identify areas of Previously Developed Land within the Borough for assessment. The Green Belt within Surrey Heath accommodates a broad range of Previously Developed Land in different uses, and which exist at a variety of scales.
- 3.19. For the purposes of this study, Previously Developed Land has been interpreted as land which is or was occupied by a permanent structure, including the curtilage of the developed land ... and any associated fixed surface infrastructure (in line with the NPPF definition).
- 3.20. A review of Previously Developed Land within the Surrey Heath Green Belt was undertaken to identify sites for assessment. As with the identification of parcels around settlements, a number of principles were developed to inform the identification of areas for inclusion within the Study, as set out below:

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<sup>21</sup> This comprises land lying wholly within, or adversely constrained by: a European Nature Conservation Site (SAC and SPA including the Thames Basin Heaths Special Protection Area; a Site of Special Scientific Interest (SSSI); ancient woodland; the 400m buffer zone of the Thames Basin Heath Special Protection Area (SPA); and, Flood Zone 3b



- Any sites smaller than 2ha will be excluded from consideration;
  - In line with the criterion set out in Paragraph 3.13 above, Previously Developed Land subject to absolute constraints will be excluded from the Study.
  - Land will not be considered to constitute Previously Developed Land where it is explicitly excluded within the NPPF definition, including land that is or was last occupied by agricultural or forestry buildings, land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures and land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
  - In addition to the above, horticultural nurseries and unauthorised developed land will not be considered within the assessment of previously developed land.
  - Although residential gardens, parks, recreation grounds and allotments outside of built-up areas are considered to constitute Previously Developed Land (taking account of the NPPF definition which excludes from the definition of PDL only those areas that lie within built-up areas), these areas will not be considered as part of this assessment.
  - Land adjacent to PDL will not be considered as part of the land parcelling assessment unless the PDL in question falls within a buffer zone surrounding a settlement, as the Council approach seeks to focus potential development close to existing settlements to reduce the potential impact on the wider Green Belt and take account of opportunities to deliver sustainable development.
- 3.21. Together, the approach to identifying parcels for further study resulted in the identification of 117 parcels (see Figure 3). Each parcel was subsequently identified by a unique reference relating to its associated settlement or PDL status, before being taken through Part 1 and Part 2 of the assessment process. Results for the Part 1 and Part 2 assessments are recorded on a detailed proforma, with a proforma completed for each parcel, giving a textual explanation of the ratings given.



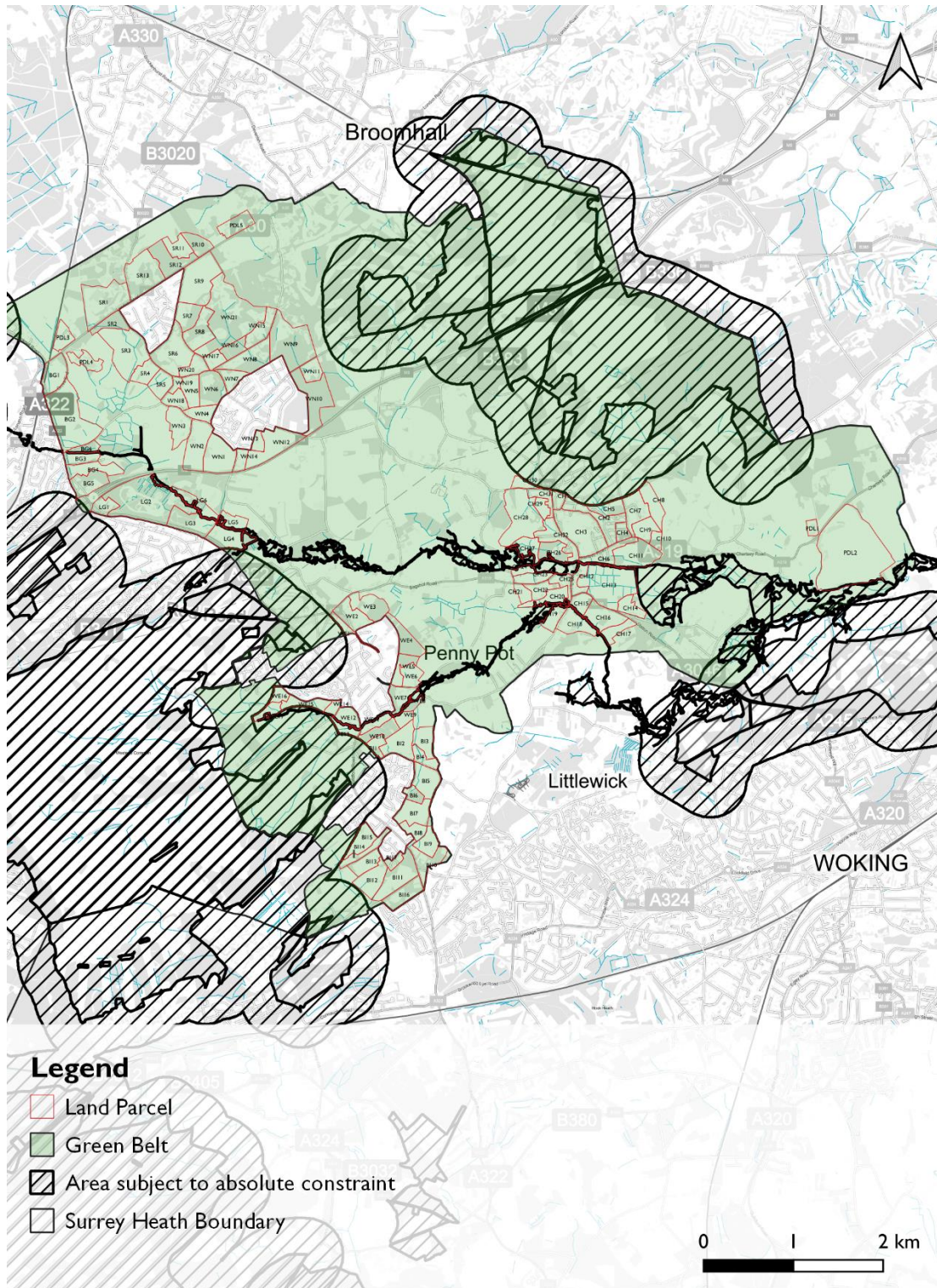


Figure 3: Land parcels for assessment





## Part I: Assessment of the function of parcels against Green Belt Purposes

### Introduction

- 3.22. The purpose of the first stage of the assessment process is to provide a comprehensive review of how each land parcel functions against the purposes of the Green Belt as set out within the NPPF.
- 3.23. The methodology for this part of the study has been developed to further refine the conclusions identified as part of the 2017 Green Belt and Countryside Study. The finer grained nature of this assessment will ensure that the function of the most sustainable land within the Green Belt is robustly understood, where the subtleties of the performance of Green Belt land may not have been as apparent in the 2017 Green Belt and Countryside Study.
- 3.24. The assessment methodology used in Part I is very similar to that used in the 2017 Study, which despite being prepared for a strategic-level study, is considered to be generally compatible with making a finer grained assessment. Notwithstanding this, some elements of the methodology have been updated as appropriate in order to ensure variation in Green Belt function can be better identified at the micro scale. Updates also seek to take account of comments received in response to the Surrey Heath Draft Local Plan Regulation 18 Consultation 2018, up to date case law, and to further increase transparency in the assessment process. Significant differences will be explained in summary within the supporting text.
- 3.25. As with the 2017 Study, each parcel will be assessed against a series of questions linked to Purposes 1 – 4 of the Green Belt as set out within the NPPF, with the objective of establishing how each parcel is functioning. By undertaking the assessment in this way using planning judgement as appropriate, consistency in the way each parcel is assessed will be secured.
- 3.26. The assessment of parcels was undertaken with regard had to a range of desk-based resources, including (but not limited to) aerial photography and Ordnance Survey mapping held within the Councils Geographic Information System.
- 3.27. The following subsections sets out how Surrey Heath considered each of the Purposes of the Green Belt through this assessment in detail, including;
- How Surrey Heath has defined relevant terms used within the NPPF for the purposes of this assessment; and,



- The questions associated with each Purpose that will be used to develop a robust understanding of how each parcel functions against each Purpose of the Green Belt.

**Purpose 1: To check the unrestricted sprawl of large built-up areas**

- 3.28. Purpose 1 recognises that the Green Belt performs a barrier role by restricting the outward growth of large built-up areas. As such the assessment of how the Green Belt within Surrey Heath functions against Purpose 1 focuses upon how parcels act to provide a barrier, or zone of constraint to the sprawl of large, built-up areas by focusing upon those parts of the Green Belt that lie at the periphery of large built-up areas.
- 3.29. In making the assessment of how parcels perform against Purpose 1, the 2017 Green Belt and Countryside Study defined sprawl as the outward spread of a large built-up area in an untidy or irregular way. Notwithstanding this, the current study seeks to clarify that in Green Belt terms, even planned, compact development has capacity to constitute sprawl. As such, this study takes into account the definition of sprawl offered by the RTP1 Research Briefing No. 9 (2015) on Urban Form and Sustainability, which reflects that even compact development forms can constitute sprawl:
- “As an urban form, sprawl has been described as the opposite of the desirable compact city, with high density, centralised development and a mixture of functions. However, what is considered to be sprawl ranges along a continuum of more compact to completely dispersed development. A variety of urban forms have been covered by the term ‘urban sprawl’, ranging from contiguous suburban growth, linear patterns of strip development, leapfrog and scattered development.”*
- 3.30. Under the 2017 Study, large built-up areas were identified as any main towns or principal urban areas which were identified within the Surrey Heath Core Strategy and Development Management Policies DPD 2011 – 2028 or the respective adopted DPD’s of neighbouring areas and that were situated directly adjacent to Borough boundary.
- 3.31. This led to the identification of Frimley and Camberley, Woking, Farnborough and Aldershot, Ash and Tongham and Blackwater and Hawley as large built-up areas. However, for the purposes of this study, only the large built-up area of Woking is considered to be of relevance. This is because the Purpose 1 assessment focuses upon the point at which the Green Belt meets built up areas. Given that the settlements of Frimley and Camberley, Farnborough and Aldershot, Ash and Tongham and Blackwater and Hawley lie some distance from the Green Belt within Surrey Heath, it is not envisaged that the Green Belt within Surrey Heath is capable of directly checking the sprawl of any of these areas; this was confirmed in the results of the Green Belt and Countryside Study 2017.



- 3.32. In determining how effectively parcels function to check the sprawl of the defined large built-up area of Woking, consideration is given to the proximity of parcels to Woking and the nature of the boundary where the Green Belt and settlement meet.
- 3.33. Those parcels falling closest to the periphery of the settlement are considered to have the greatest potential to function against Purpose 1 as it is these areas that provide the immediate zone of constraint to further expansion. The capacity for a parcel to prevent the sprawl of a large, built-up area will fall away with distance from the urban edge.
- 3.34. The capacity for a parcel to prevent the sprawl of a large, built-up area is also affected by its character at the point at which the rural and urban areas meet, in addition to the nature of any features which define the threshold between the areas, including the presence of any absolute constraints, such as common land.
- 3.35. Paragraph 143 of the NPPF indicates that Green Belts with boundaries that are clearly defined using recognisable features are more likely to be permanent; an essential characteristic of Green Belts are their permanence. Where such features define the point at which the Green Belt meets large built-up areas, the land subject to restrictive Green Belt designations can be reinforced by allowing the land outside of the urban area to be more clearly understood in the landscape as countryside, where urban sprawl would not be appropriate. Land that has a strong urban edge boundary would perform more strongly as part of a settlement gap than land already under significant influence from the urban area. As such, parcels that benefit from outer edges (adjacent to large built-up areas) defined by recognisable features that are likely to be permanent are likely to function more successfully against Purpose 1.
- 3.36. In some cases, parcels may not benefit from a strong boundary feature at their outer edges (adjacent to large built-up areas), but the land beyond the urban area nonetheless exhibits a robust and unspoiled rural character. In such locations the distinction between rural and urban areas is clear and as a result, it will be considered that the Green Belt has nonetheless demonstrably functioned to check sprawl arising from a neighbouring large built-up area.
- 3.37. Elsewhere, the boundary between the rural and urban areas may be poorly defined and/or diffuse in character with existing evidence of sprawl, which may take a variety of forms as set out above. Such boundaries lack permanence and do not allow the differentiation between the Green Belt and the urban environment to be clearly understood.
- 3.38. The assessment criterion for Purpose 1 is set out in Table 1 below. The Purpose 1 assessment was undertaken with reference to aerial photography and Ordnance Survey base maps held within the Council's Geographic Information System, with desk-based findings checked and challenged through site visits.



Criteria	Level of function
<p>Land parcels will be directly adjacent or close to a large built-up area and will provide the nearest zone of constraint to the expansion of the area. The parcel provides a recognisable feature that is likely to be permanent (such as roads, rivers, wooded areas) and can be clearly understood as a limit to urban expansion. Such features may have already demonstrably checked sprawl. There will be no notable evidence of urban sprawl beyond the feature.</p>	<p>Functions Strongly</p>
<p>Land parcels will be adjacent to or close to a large built-up area and will provide the nearest zone of constraint to the expansion of the area. The parcel does not provide a recognisable or permanent feature which can be understood as a limit to urban expansion but there is no appreciable evidence of urban sprawl, with the Green Belt designation having demonstrably functioned to check sprawl arising from a neighbouring large built-up area.</p>	<p>Functions Moderately</p>
<p>Land parcels will be adjacent to or close to a large built-up area and will provide the nearest zone of constraint to the expansion of the area. The point at which the two areas meet will be poorly defined and/or diffuse in character with existing evidence of sprawl.</p>	<p>Functions Weakly</p>
<p>Land parcels will be close to a large built-up area but do not provide the nearest effective zone of constraint to the expansion of the area. Land parcels are not adjacent or close to the defined large, built-up areas and do not provide a zone of constraint to the sprawl of such an area.</p>	<p>No appreciable function</p>

Table 1: Criteria for assessment against Purpose 1



**Purpose 2: To prevent neighbouring towns from merging**

- 3.49. Purpose 2 recognises that the Green Belt performs an interstitial role by maintaining gaps or spaces between towns. As such the assessment of how the Green Belt parcels function against Purpose 2 examines the role land within each parcel plays in maintaining the gaps between towns.
- 3.50. In making the assessment of how parcels perform against Purpose 2, Surrey Heath has defined 'merging' as the coalescence of towns so that they become, or appear to become, a single entity.
- 3.51. The Green Belt and Countryside Study 2017 gave consideration to how each parcel functioned to inhibit the merging of settlements across a range of scales, including villages. The approach was considered to reflect the difficulties inherent in distinguishing towns from villages without employing rudimentary measures and also sought to acknowledge at a local level, the administrative boundaries of Surrey Heath and its adjoining Boroughs contain a plethora of physically separate and distinct settlements across a range of scales, the merging of which would not only have implications for the identity and local character of those places, but could also impact significantly upon the integrity of the Green Belt. As a result, the 2017 Study took into consideration any settlement with a defined boundary identified within the Surrey Heath Core Strategy and Development Management Policies DPD 2011 – 2028 or the respective adopted DPD's of neighbouring areas, irrespective of scale, for the purposes of the assessment. For the purposes of robustness however, the current study has sought to define towns as distinct from villages and smaller settlements.
- 3.52. There is no national guidance or prevailing method on how to categorise settlements. The Oxford English Dictionary defines a town as 'a place with many houses, shops, etc. where people live and work. It is larger than a village but smaller than a city'. The National Geographic website provides no definition for a town but does define a village as 'a small settlement usually found in a rural setting. It is generally larger than a hamlet, but smaller than a town', indicating that 'some geographers specifically define a village as having between 500 and 2,500 inhabitants. The South East Plan also included guidance on defining types of settlement/service centres. Although the South East Plan has been revoked, its approach to settlement hierarchy is a useful guide. Supporting text to the now revoked Policy BE5 of the South East Plan, defined towns as settlements with populations exceeding 3,000.



- 3.53. Moving away from population-based approaches to defining settlements, the Office of National Statistics (ONS) has prepared the latest Rural-Urban classification, published in August 2013 and based on 2011 data. The Rural-Urban classification is used to distinguish rural and urban areas in the UK. Page 18 of the Rural-Urban Classification User Guide sets out the distinction between a ‘village’ and a ‘town’ is based on settlement form rather than population size, the economic function or historic role and usefully recognises that the density profile rules in Bibby and Brindley (2013) imply that where a dwelling forms part of a town there must be at least 500 other dwellings within 800 metres.
- 3.54. Taking into account the guidance set out above, this Study has sought to define towns in a technical capacity<sup>22</sup> as any settlement area with an estimated population exceeding 3,000 people and that features more than circa 500 dwellings within an 800m radius. In addition to filtering out smaller settlements from the 2017 Study, the current Study has also sought to refine the list of settlements considered under Purpose 2 to include only those that relate closely to the Borough’s Green Belt. As a result, any settlements distant from the Borough (for example, those set beyond closer towns) and any settlements distant from the Surrey Heath Green Belt have been removed from consideration. The resultant settlements defined as towns for the purposes of the assessment are set out in Table 2 below. Notwithstanding the more focused list of settlements for consideration under the Purpose 2 assessment, this would not preclude consideration of how smaller intervening settlements and other development affects the gap between towns, both spatially and visually.

Local Authority Area	Relevant Towns
Surrey Heath	Camberley, Frimley and Frimley Green, Mytchett, Bagshot, Bisley West End, Lightwater, Chobham, Windlesham (including Snows Ride).
Bracknell Forest	Bracknell/Binfield, North Ascot.
Royal Borough of Windsor and Maidenhead	Ascot, Sunningdale, Sunninghill.

<sup>22</sup> Definition is made without prejudice to the popular recognition of some identified settlements as villages



Runnymede	Englefield Green, Chertsey, Addlestone, Virginia Water, Woodham
Woking	Woking (comprising Woking, West Byfleet, Sheerwater and Knaphill)
Guildford	No towns considered owing to distance and spatial relationship between Guildford and Green Belt within Surrey Heath
Rushmoor	No towns considered owing to distance and spatial relationship between Guildford and Green Belt within Surrey Heath
Hart	No towns considered owing to distance and spatial relationship between Guildford and Green Belt within Surrey Heath

Table 2: Settlements for consideration under the Purpose 2 assessment

- 3.73. In determining how effectively each parcel functions to prevent the identified settlements from merging into one another, consideration is given to the spatial and perceptual factors that are considered relevant to a parcels contribution to Purpose 2.
- 3.74. As with the 2017 Study, those parcels that prevent development within a narrow gap between identified settlements are likely to have the greatest capacity to play a role in preventing settlements from merging. parcels that prevent development within a broad gap between settlements are considered less essential in preventing settlements from merging; in such locations development could potentially occur without settlements merging. For the purposes of transparency in the current Study and having regard to the spatial characteristics of the Surrey Heath Green Belt and its wider environment, any gap under 1km has generally been considered to constitute a narrow gap. A gap of circa 2km has been considered as a moderate gap and a broad gap has been considered as being in excess of 3km.



- 3.75. Notwithstanding this, as noted in PAS guidance, distance alone should not be used to assess the extent to which the Green Belt prevents settlements from merging into one another. The PAS guidance also refers to settlement character and the character of land in between as being relevant considerations when looking at retaining 'separateness'. For example, a broad gap may be perceived as being narrower owing to its visual characteristics, or development within a narrow gap between settlements may in some rare cases be deliverable without the perception of settlements merging because other features ensure that the settlements remain visually separate.
- 3.76. The 2017 Study recognised that the visual characteristics of a parcel have such a capacity to impact upon the sense of a gap between settlements; this is not new to this Study. Landform and land cover within each parcel can act to connect or separate neighbouring settlements visually and the presence of roads connecting settlements or barriers (e.g. rivers) separating settlements can all influence how a gap between settlements is perceived and experienced, as can the presence of urbanising features, or absolute constraints, such as floodplain or the Thames Basin Heaths Special Protection Area. As with the assessment under Purpose 1, land that benefits from a strong urban edge is likely perform more strongly as part of a settlement gap than land that is already under significant influence from the urban area.
- 3.77. A particular issue in respect of the Surrey Heath Green Belt is the prevalence of often historic and intermittent ribbon development and the impact that this has on the perception of the gaps between the Borough's rural settlements. In some cases, the impact of ribbon development may not go so far as to give rise to the impression of settlements merging, but may nonetheless render a settlement gap fragile, irrespective of its overall size. In other cases, ribbon development may be of such intensity and so continuous that it gives rise to the appearance of settlements merging. The more focused nature of the current Study enables Surrey Heath to make a more detailed assessment how ribbon development affects the perception of gaps between settlements.
- 3.78. Taking the above into account, it is important to recognise that the contribution an individual parcel makes to a gap between settlements is significantly influenced by the size and visual characteristics of the gap overall; the characteristics of land outside of the parcel under consideration may by necessity affect the contribution the parcel itself can make to Purpose 2.





3.79. The assessment criterion for Purpose 2 is set out in Table 3 below. It is recognised that any individual parcels may fall within a plethora of gaps between settlements; as such focus is taken on the principal role or roles played by each parcel. The Purpose 2 assessment was undertaken with using Ordnance Survey mapping held within the Council’s Geographic Information System, in addition to information gathered through site visits and contained within the Surrey Heath Landscape Sensitivity Assessment.

Criteria	Level of function
<p>The parcel is considered to play a very strong role in preventing development that would result in the merging of settlements. The parcel falls within a narrow gap between settlements and provides a reasonably strong visual break between them. Alternatively, the parcel falls within a moderate or broad gap between settlements, but features within the parcel (including, but not limited to gaps in existing ribbon development) are essential to preventing development that would otherwise lead to a sense of connection between settlements. Loss of openness would be likely to significantly undermine the actual or experienced gap.</p>	<p>Functions Strongly</p>
<p>The parcel is considered to play a moderate role in preventing development that would result in the merging of settlements. The parcel falls within a moderate gap between settlements and provides a strong visual break between them. Alternatively, the parcel falls within a broad gap between settlements where features within the parcel are important to preventing development that would otherwise lead to the sense of the gap between settlements reducing significantly. Loss of openness would not necessarily compromise the overall gap between settlements in this location, however the overall scale of the gap is important to ensure that the overall actual or experienced gap is not undermined.</p>	<p>Functions Moderately</p>



<p>The parcel is considered to play a very limited role in preventing the merging or erosion of the actual or perceived gap between settlements. The parcel may fall within a location where there is a broad gap between settlements where there is no perception of connectivity. Alternatively, features within the parcel may contribute significantly to a sense of connection between settlements.</p>	<p>Functions Weakly</p>
<p>The parcel is considered to play no appreciable role in preventing the merging or erosion of the visual or physical gap between settlements. The parcel falls within a location where the gap between settlements has already been eroded or the parcel is already developed to a degree that openness has been lost.</p>	<p>No appreciable function</p>

Table 3: Assessment Criteria for Purpose 2

**Purpose 3: To assist in safeguarding the countryside from encroachment**

- 3.90. Purpose 3 recognises that Green Belt policy performs a safeguarding role, by protecting countryside that is enjoyed for its openness. As such the assessment of how the Green Belt within Surrey Heath functions against Purpose 3 is focused upon the open character and degree of urbanising features within and surrounding each parcel. The assessment under Purpose 3 is generally the same as made under the terms of the Green Belt and Countryside Study 2017, however the methodology has been updated to better address the role of visual openness and urbanising influence in the assessment process.
- 3.91. In making the assessment of how parcels perform against Purpose 3, ‘countryside’ is defined as open land that exhibits a rural character. ‘Openness’ refers to the extent to which countryside can be considered open from an absence of urbanising features rather than from a landscape character perspective, where openness might be influenced by through topography and presence (or otherwise) of woodland and hedgerow cover. The absence of visual openness arising from natural features is not, for the purposes of this assessment, considered to diminish openness in Green Belt terms.



- 3.92. 'Urbanising features' are considered to be built forms of development or other building operations normally associated with urban land uses, including (but not limited to) highways infrastructure, housing estates, prisons and commercial facilities. Such features are considered to compromise the rural character and openness of the countryside. Urbanising features may have both a spatial and visual impact upon openness and hold potential to compromise the rural character and openness of the countryside.
- 3.93. The assessment also gives consideration to the impact of urbanising influence from neighbouring land, taking into account whether open land is contained by urbanising features and the extent to which an absence of visual association with urban areas may increase association with the open Green Belt or, conversely, the extent to which the visual or spatial dominance of urban development may increase association with the urban area. This consideration formed part of the assessment considerations under the 2017 study, but taking account that this Study is focused more keenly on the urban edge, has capacity to form a more prominent part of the assessment.
- 3.94. For clarity, development commonly found within the countryside, such as agricultural or forestry related development, isolated dwellings and churches in addition to those forms of development considered under Paragraphs 149 and 150 of the NPPF to be not inappropriate development within the Green Belt cannot, according to case law, be considered to have an urbanising influence and therefore harm Green Belt purposes.
- 3.95. Those parcels that exhibit the characteristics of open countryside and possess a significant degree of openness, with urbanising features limited to small scale development and/or development appropriate to the countryside, are considered to have the greatest capacity to function against Purpose 3. Where the open countryside character of a parcel is compromised by urbanising features either inside or outside of a parcel, parcels are considered to have less capacity to function against this Purpose. parcels have no appreciable function against this Purpose where they are dominated by urbanising features and exhibit no characteristics of the countryside.



- 3.96. In assessing the function of parcels against Purpose 3, the degree of urbanising development within a parcel was initially estimated. As a rule of thumb, any parcel containing less than an estimated 7% urbanising features was considered to perform strongly against this purpose. A parcel containing between 8% and 15% urbanising features was considered to perform moderately against this Purpose and any parcel containing an estimated 16% urbanising development or above was considered to perform weakly against this purpose. Notwithstanding this, these percentages were then considered further in light of qualitative assessments of the form, texture and character of development within the parcel, as well as the impact upon the parcel of urbanising features from outside the parcel. Professional judgement was then used to draw to a conclusion on the overall level of function of each parcel. Using professional judgement allowed for a more holistic view and assessment of each parcel, as each parcel is unique in the way that it may be experienced.
- 3.97. The assessment criterion for Purpose 3 is set out in Table 4 below. Ordnance Survey base maps and aerial photography contained on the Council’s Geographic Information System will be reviewed in order to undertake this assessment, with findings of the desk-based assessment to be checked and challenged through site visits.

Criteria	Level of function
<p>The land parcel possesses the characteristics of the open countryside and exhibits a significant degree of openness. Development will generally be limited to buildings and uses otherwise expected in the countryside, with little or no urbanising development. There is little or no sense of urbanising influence from neighbouring land.</p>	<p>Functions Strongly</p>
<p>The land parcel generally possesses the characteristics of the open countryside. Development will be limited to buildings and uses otherwise expected in the countryside, although some limited small-scale urbanising development may be present, compromising openness on a localised basis. There may be some limited sense of urbanising influence from neighbouring land.</p>	<p>Functions Moderately</p>



<p>The parcel exhibits some characteristics of the open countryside, however urbanising features are likely to be prevalent and/or parcels may be subject to urbanising influences from neighbouring land. The openness of the parcel is compromised.</p>	<p>Functions Weakly</p>
<p>The land parcel is dominated by urbanising features and exhibits no notable characteristics of the open countryside.</p>	<p>No appreciable function</p>

Table 4: Assessment criteria for Purpose 3

**Purpose 4: To preserve the setting and special character of historic towns**

- 3.100. Purpose 4 recognises that Green Belt policy can perform a character role by providing the landscape context to historic towns. As such the assessment of how the Green Belt within Surrey Heath functions against Purpose 4 is outward looking from historic towns, giving consideration to the contribution that the openness of the Green Belt makes to the setting and special character of these.
- 3.101. For the purposes of this assessment, historic towns are considered to be places that feature an accumulation of individual designated and non-designated heritage assets (which could include buildings, spaces and other built or natural features) such that the contribution that each individual asset makes to the historic identity of the settlement is amplified by virtue of its proximity to and relationship with other such assets. It is expected that historic towns will exhibit a strong and recognisable historic identity and character (even though they may also incorporate more recent development).
- 3.102. Under the terms of the 2017 Green Belt and Countryside Study, the Study concluded that the only historic settlements within the study area which have notable inter-visibility with Green Belt in Surrey Heath were Chobham and Bagshot. This conclusion remains appropriate for the purposes of the current study<sup>23</sup>.

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<sup>23</sup> both settlements are popularly recognised as villages, but nonetheless meet the technical criteria for consideration as towns (set out under Purpose 2) within this methodology



- 3.103. In determining how effectively parcels function to preserve the setting and special character of these historic settlements, consideration is given to how the openness or other characteristics of each parcel interacts with the historic areas of the identified settlements. In an update to the 2017 methodology, consideration will also be given to whether there are distinctive features experienced on approach to a historic settlement which may give a Purpose 4 function to land which has a less direct visual relationship with the historic core of the settlement.
- 3.104. Those parcels that make a contribution to the setting and special character of a historic town by virtue of their spatial relationship and openness are considered to have greatest capacity to function against Purpose 4. parcels that are considered to have no function in this respect are those that do not provide the setting to any historic town.
- 3.105. The assessment criterion for Purpose 4 is set out in Table 5 below. In order to undertake this assessment, Conservation Area Appraisals were referred to where appropriate. Regard was also given to Ordnance Survey base maps and aerial photography contained on the Council' Geographic Information System. Site visits were also undertaken.

Criteria	Level of function
The openness and countryside character of the land parcel play a significant role in enhancing the setting and special character of a historic settlement, by virtue of its character, views, inter-visibility, topography, features or landscape.	Functions Strongly
The openness and countryside character of the land parcel play a moderate role in enhancing the setting and special character of a historic settlement, by virtue of its character, views, inter-visibility, topography, features or landscape.	Functions Moderately
The openness and countryside character of the land parcel play a minor role in enhancing the setting and special character of a historic settlement, by virtue of its character, views, inter-visibility, topography, features or landscape.	Functions Weakly



<p>The land parcel does not form part of the setting or contribute to the special character of any historic town by reason of its character, views, inter-visibility, topography, features or landscape.</p>	<p>No appreciable function</p>
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Table 5: Assessment criteria for Purpose 4

**Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

- 3.106. As with the 2017 Study, Purpose 5, which relates to assisting in urban regeneration by encouraging the recycling of derelict land, was not incorporated into this assessment.
- 3.107. PAS guidance contained within ‘Planning on the Doorstep’ states: “...it must be the case that the amount of land within urban areas that could be developed will already have been factored in before identifying Green Belt land. If Green Belt achieves this purpose, all Green Belt does to the same extent and hence the value of various land parcels is unlikely to be distinguished by the application of this purpose.” In essence it is highly unlikely that development pressures operate at a sufficiently localised level to draw out meaningful judgements on the relative impact of discrete parcels of Green Belt land on Purpose 5. Elsewhere, the Inspector’s report (D Smith) to the London Borough of Redbridge (January 2018) notes that with regards to Purpose 5 “this purpose applies to most land” but that “it does not form a particularly useful means of evaluating sites” – File reference: PINS/W5780/429/10.
- 3.108. The Council recognises that Purpose 5 should be afforded equal weight with Purposes 1 – 4 – by reason of its restrictive character, Green Belt designations are invaluable in encouraging urban regeneration and the recycling of brownfield and other derelict land by constraining land supply, steering development to urban locations and making the recycling of derelict and other urban land more viable. However, measuring accurately the extent to which individual parcels contribute to this process of recycling of derelict and other urban land is problematic. While it would be possible to undertake a spatial analysis of the supply of brownfield land relative to parcels across a range of scales, it is exceptionally difficult to identify and robustly measure a causal link between the policy restraint in a particular parcel and the recycling of urban land elsewhere, in part reflecting the complexity of the development process, the prevalence of policy mechanisms aimed at encouraging the recycling of previously developed land, locational requirements of different types of development and variations in the property market over time.



- 3.109. The complexity arising from the interplay of these varied factors in the relationship between the Green Belt and countryside in Surrey Heath and its neighbouring urban areas mean that spatial analysis based on the supply of brownfield land relative to the locations of individual parcels would either be overly simplistic or would be based on significant assumptions such as to place the results in significant doubt.
- 3.110. In view of these issues, it has been considered that there is no appropriate means to establish with certainty the degree to which each parcel assists in urban regeneration on a parcel-by-parcel basis, without risk of drawing to inaccurate conclusions based on supposition alone.

**Recording the Results of the Stage I Assessment & the overarching Function Assessment**

- 3.111. As noted in Paragraph 3.2, a pro forma was completed for each parcel, providing a detailed textual explanation in respect of how each parcel performs in respect of the criteria. Initially, each parcel will be assessed in terms of its function against each Purpose. A colour coding classification system (see Figure 4) accompanies the textual explanation for each Purpose. It is considered that this approach to individually assessing each Purpose of the Green Belt allows for the conclusions reached in respect of the function of each parcel against each Purpose to be set out in a transparent way. Each colour-coded rating will reflect the highest contribution the majority of the land within each parcel makes to each purpose.

Level of function
Functions Strongly
Functions Moderately
Functions Weakly
No appreciable function





- 3.112. Under the terms of the 2017 Study, no aggregation or scoring of ratings to provide an overall assessment was provided as it was considered that this could result in parcels that make a low or moderate contribution to a number of Purposes ranking higher than those which make a strong contribution to one Purpose only. It was recognised that the NPPF does not require all the Purposes to be met simultaneously and as such parcels hold capacity to make a significant contribution to Green Belt Purposes without performing against every Purpose. Notwithstanding this, it was recognised that in making judgements in respect of the overall contribution to Green Belt purposes, a parcel that functions strongly with respect to several purposes is likely to be considered more important to Green Belt functionality than a parcel that functions strongly against a single purpose.
- 3.113. In contrast to the approach taken in the 2017 Study however, an overall functionality rating will be provided for each parcel assessed under the current Study, taking into account the function of each parcel against the four NPPF purposes. The approach used to identify an overall rating for each parcel is set out in Figure 5 below and has been developed in order to address the concerns set out in the 2017 Study and reiterated in the Paragraphs above.

Description	Level of Function
The parcel functions strongly against at least two Purposes and moderately against at least one Purpose	<b>Very High Function</b>
The parcel functions strongly against at least 2 Purposes; or functions strongly against at least 1 Purpose and moderately against at least 1 other	<b>High</b>
The parcel functions strongly against at least 1 Purpose, or moderately against all Purposes	<b>Moderate High</b>
The parcel functions moderately against at least two Purposes	<b>Moderate</b>
The parcel functions moderately against at least one Purpose	<b>Low Moderate</b>



Functions weakly against at least two Purposes	Low
The parcel functions weakly against one or fewer Purposes	Very Low

Figure 5: Assessment criteria for overarching Function Assessment

## Part 2: Wider Impact Assessment

- 3.114. Part 2 makes a qualitative assessment using planning judgement and the findings of the Part 1 assessment to give consideration as to the degree to which the release of each land parcel could affect the integrity and long-term protection of the wider Green Belt, in the event of its release. Assessment under Part 2 will give consideration to the impact of Green Belt release upon adjacent Green Belt land.
- 3.115. Adjacent Green Belt land is defined in this study as the land that lies next to and/or in close proximity to parcel being assessed for potential release. For the purposes of the assessment, it will be assumed that the parcel being assessed will not be open and would be notionally developed across its full extent at a density of 30dph.
- 3.116. Reflecting PAS guidance, the release of a parcel upon the integrity of the wider Green Belt is more likely to be limited where:
- The parcel would effectively be infill, with the parcel already enclosed by, or closely associated with the urban area;
  - The parcel is well contained by the landscape;
  - A strong boundary could be created where there is robust distinction between rural and urban areas.
- 3.117. Conversely, the release of a parcel upon the integrity of the wider Green Belt is more likely to be detrimental where:
- The parcel would result in the increased containment of open Green Belt land, which could lead to future pressure for release;
  - The parcel is not well contained by the landscape;
  - The release of the parcel would result in the creation of a more diffuse boundary, where rural and urban areas are, or could be, less discernible from each other. For example, going from a strong boundary to a weaker boundary where there is perceived to be little opportunity to establish a robust boundary, or moving a



boundary to a location where proximity to development uncharacteristic of the Green Belt would lead to the appearance of sprawl.

- 3.118. In many circumstances, the extent of the impact of the release of a parcel upon any adjacent land that remains designated as Green Belt is limited by the strength of adjacent Green Belt land in relation to the Green Belt purposes. For example, the increased containment of land that is considered to function poorly against the Purposes of the Green Belt, will constitute less of an impact than the containment of land that has a stronger relationship with the wider countryside, and therefore plays a more significant role in relation to the Green Belt purposes.
- 3.119. As with the assessment under Part I, a colour coded classification system will be used to identify the level of risk to the wider Green Belt if a parcel were removed from the Green Belt (see Table 6), using planning judgement as necessary.

Criteria	Level of risk
<p>The parcel does not relate closely with a settlement;</p> <p><i>Or a combination of the following:</i></p> <p>Development within the parcel would result in the increased containment of open Green Belt land;</p> <p>The parcel is not well contained by the landscape;</p> <p>The release of the parcel could result in a more diffuse boundary where rural and urban areas are, or could be less discernible from each other.</p>	Higher Risk to wider Green Belt
<p>A combination of factors from higher and lower risk categories – e.g. Development would result in increased containment of Green Belt land but would be well contained by the landscape; The parcel would be infill but would result in the creation of a more diffuse boundary.</p>	Moderate Risk to wider Green Belt
<p>The parcel would be infill with the parcel already enclosed by or closely associated with a settlement;</p> <p>The parcel is well contained by the landscape;</p> <p>A strong boundary could be created where there is robust distinction between rural areas.</p>	Lower Risk to wider Green Belt
<p>The parcel is already significantly developed</p>	Negligible Risk - Risk reflects existing relationship with wider Green Belt

Table 6: Criteria for the Wider Impact Assessment



- 3.120. It is recognised that it may be the case that the release of an individual parcel would be likely to compromise the long-term protection or integrity of the surrounding Green Belt, but as a group of parcels, its impact upon the integrity of the wider Green Belt would be lessened. For example – development within a parcel would result in significant containment of adjoining Green Belt land but release in conjunction with the contained land would address the identified concerns. As such, the Wider Impact Assessment will comprise 2 Stages. At Stage 1, the impact on the wider Green Belt of the release of each parcel on an individual basis will be considered. At Stage 2, consideration will be used to determine whether the release of a parcel in conjunction with neighbouring parcels would result in a lower level of risk to the integrity of the wider Green Belt.
- 3.121. Planning judgement will be used to make the assessment. A rating will only be provided in Stage 2 if it is concluded that the risk level reduces from the Stage 1 assessment. In the event that the risk level identified is equal to, or higher than that given for Stage 1, no rating will be provided.
- 3.122. It is recognised that there may be multiple combinations of parcels beyond those assessed at Stage 2 that could be considered in terms of their impact upon the wider Green Belt. The assessment under Stage 2 is focused on the most likely combinations of parcels to limit the impact upon the wider Green Belt, but it is not exhaustive, and does not preclude further consideration of the cumulative loss of alternative groupings of parcels at a later date if deemed appropriate.
- 3.123. Results from the Part 2 assessment will be incorporated into the Assessment Proforma, with a textual explanation given for conclusions reached.
- 3.124. The following section discusses the findings of the assessment.



## 4. Findings of the Study

### Introduction

- 4.1. This section summarises the findings of the Green Belt Review. The Green Belt assessments can be broadly broken down into two discrete outputs:
- Contribution to the Green Belt purposes (the product of Part 1 of the assessment methodology), i.e. the relative performance of the borough's Green Belt rated against the purposes of Green Belt set out in the National Planning Policy Framework; and
  - Impact of release of parcels upon the wider Green Belt (the product of Part 2 of the assessment methodology).
- 4.2. Figures 4 - 7 illustrate the function of Surrey Heath's Green Belt against each individual purpose of the Green Belt considered through the Study. Figures 8-10 set out the results of the Function Assessment, which gives each parcel a rating based on its level of function against each of the Green Belt purposes. A textual summary will be provided describing the key findings of each Purpose assessment in summary, in addition to the findings of the overarching Function Assessment.
- 4.3. Figure 11 illustrates the findings of Stage 1 of the Part 2 assessment, which gives consideration to the impact upon the wider Green Belt of the release of individual parcels. Figure 12 illustrates the findings of Stage 2 of the Part 2 assessment and will only show those parcels whose risk rating would reduce if released in conjunction with other parcels. As with the results of the Part 1 Study, a textual explanation will be provided describing the key findings of the assessments. The following section discusses the findings of Part 1 and Part 2 of the Study.
- 4.4. A full table of the results of the Part 1 and Part 2 assessments can be found at Annex 1 and full assessment proformas can be found at Annex 2.

### Findings of Part 1: Green Belt Purposes Assessment

#### **NPPF Purpose 1: To check the unrestricted sprawl of large built-up areas**

- 4.5. Figure 4 shows the function of each parcel towards checking the unrestricted sprawl of large built-up areas.



- 4.6. The methodology for Stage I of the assessment recognises that land falling closest to the periphery of large built-up areas will have greatest potential to function against Purpose I as it is these areas that provide the immediate zone of constraint to further expansion. The capacity of land to prevent the sprawl of a large built-up area will fall away with distance from the urban edge.
- 4.7. For the purposes of the Stage I assessment, only Woking, which lies in close proximity to Green Belt within Surrey Heath was considered to constitute a large built-up area.
- 4.8. Only five parcels (BI9 – BI12 and BI16) were identified as functioning to check the unrestricted sprawl of Woking. These lie adjacent to the large built-up area and by virtue of their generally undeveloped character, function Strongly in this respect.
- 4.9. It is not considered that any other Green Belt parcels function to check the sprawl of a large, built-up area. This reflects the spatial characteristics of the Borough, with no other large built-up areas situated within, or in close proximity to the easternmost part of Surrey Heath where the Green Belt is designated.



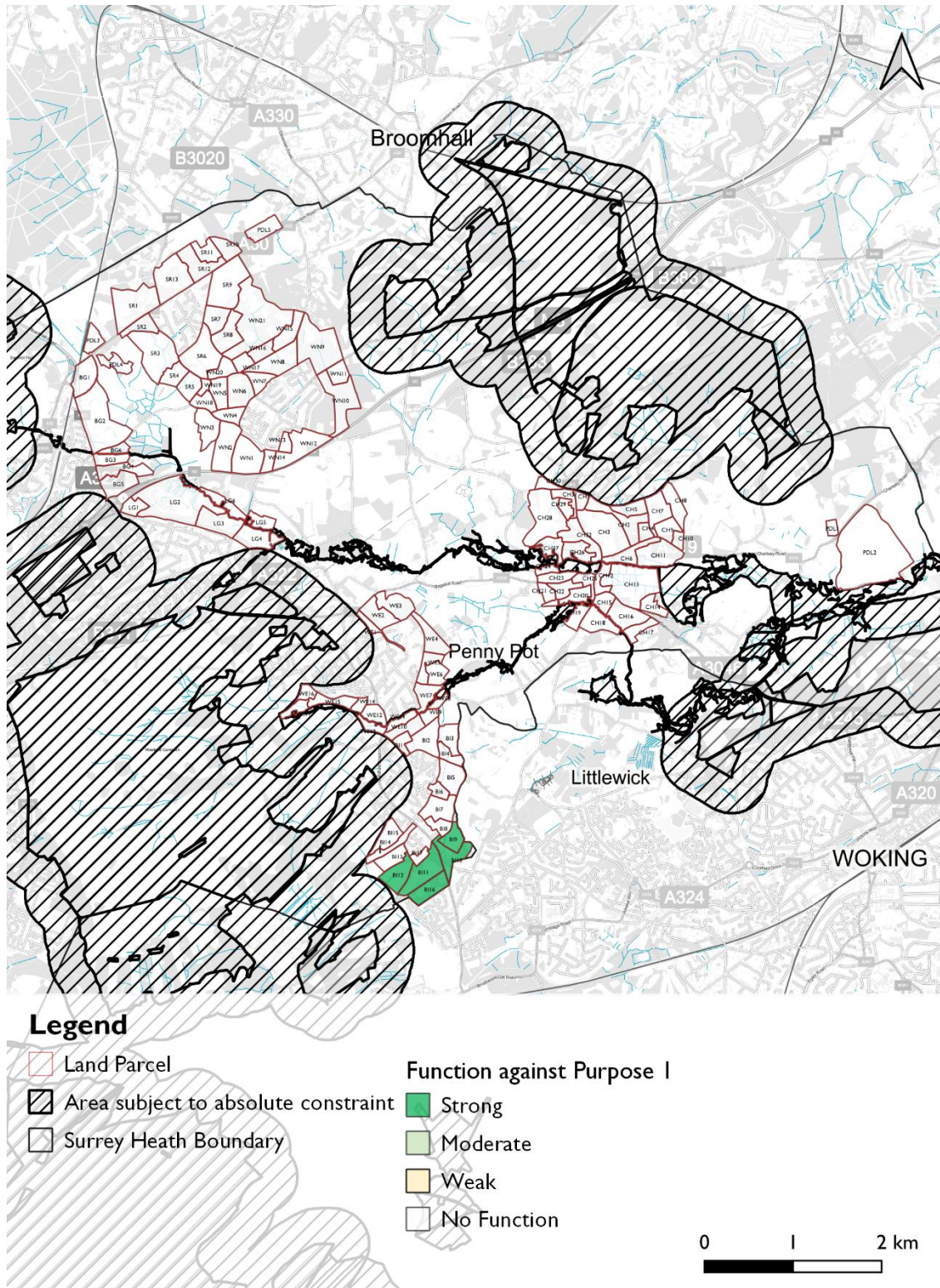


Figure 4: Results of the Purpose I Assessment



**Purpose 2: To prevent neighbouring settlements from merging into one another**

- 4.10. Figure 5 shows the function of each parcel towards preventing neighbouring settlements from merging.
- 4.11. Parcels with the strongest function against Purpose 2 are generally found in clusters, most predominantly around the very narrow settlement gaps between Bisley and Woking (BI9 – BI12, BI16) and Bisley and West End (WE10 – WE11, WE13, BI1). These settlements are situated in close succession along the A322, with a limited gap of less than 500m between Bisley and Woking and less than 300m between Bisley and West End. The relatively strong countryside character and absence of prevalent and visible ribbon development in this location is considered to contribute successfully to the sense of the gap between the settlements in these locations.
- 4.12. Ribbon development was a significant factor for consideration in the Purpose 2 assessment. The methodology for the Study recognised that ribbon development can affect the perception of settlement gaps in a number of ways. In areas of intense ribbon development, the land subject to the ribbon development may be so affected that it cannot be considered to contribute to the sense of separation between settlements. Elsewhere, the presence of intermittent ribbon development may render a gap fragile – whilst development in itself brings a sense of connectivity between settlements, the remaining open land surrounding the development is considered more important to the settlement gap; if remaining open land is lost, the sense of separation between settlements may be wholly lost. This led to the strong rating of many parcels between Windlesham and Snows Ride, in addition to parcels to the north of Chobham between Chobham and Windlesham (CH28 and CH30) and between Chobham and West End (CH21 – CH24, WE3, WE5 – WE7).
- 4.13. Parcels to the eastern side of the A322 adjoining Bagshot and Lightwater were generally considered to function strongly in maintaining the settlement gaps between Bagshot and Lightwater to the west and Windlesham/Windlesham (Snows Ride) to the east. This resulted from the strength of the boundary between rural and urban areas provided by the A322 in this location, and the open characteristics of the land to the eastern side of the highway.





- 4.14. Parcels to the south west of West End and Bisley were identified as having a lesser function in respect of Purpose 2, owing to limited connectivity to other settlements through roads and landscape in these areas. To the south east of Chobham, the presence of small pockets of development and ribbon development similarly resulted in the down rating of parcels in the vicinity of Station Road. In this particular area it was recognised that the gap between Woking and Chobham was broader, and that landscape features beyond the parcel in Woking Borough provided the strongest parts of the settlement gap.
- 4.15. Similarly, land to the south of Windlesham was also found to function less effectively against Purpose 2. Here, the M3 lies just south of the defined settlement, containing land designated as Green Belt between the settlement and the motorway. In this location, the presence of the M3, in addition to ribbon and other development, limits the contribution that the land makes to the gap between Windlesham and Chobham and Windlesham and Lightwater.
- 4.16. Land to the east of both Windlesham and Chobham was generally found to have a lesser function against Purpose 2 owing to the relatively wide settlement gaps present to the east of these settlements.
- 4.17. In a handful of cases, it is recognised that land has been developed to such a degree that it cannot reasonably contribute to Purpose 2. This is most notable in the centre of Chobham and in small pockets between Windlesham and Windlesham (Snows Ride) (WN19 – WN20).



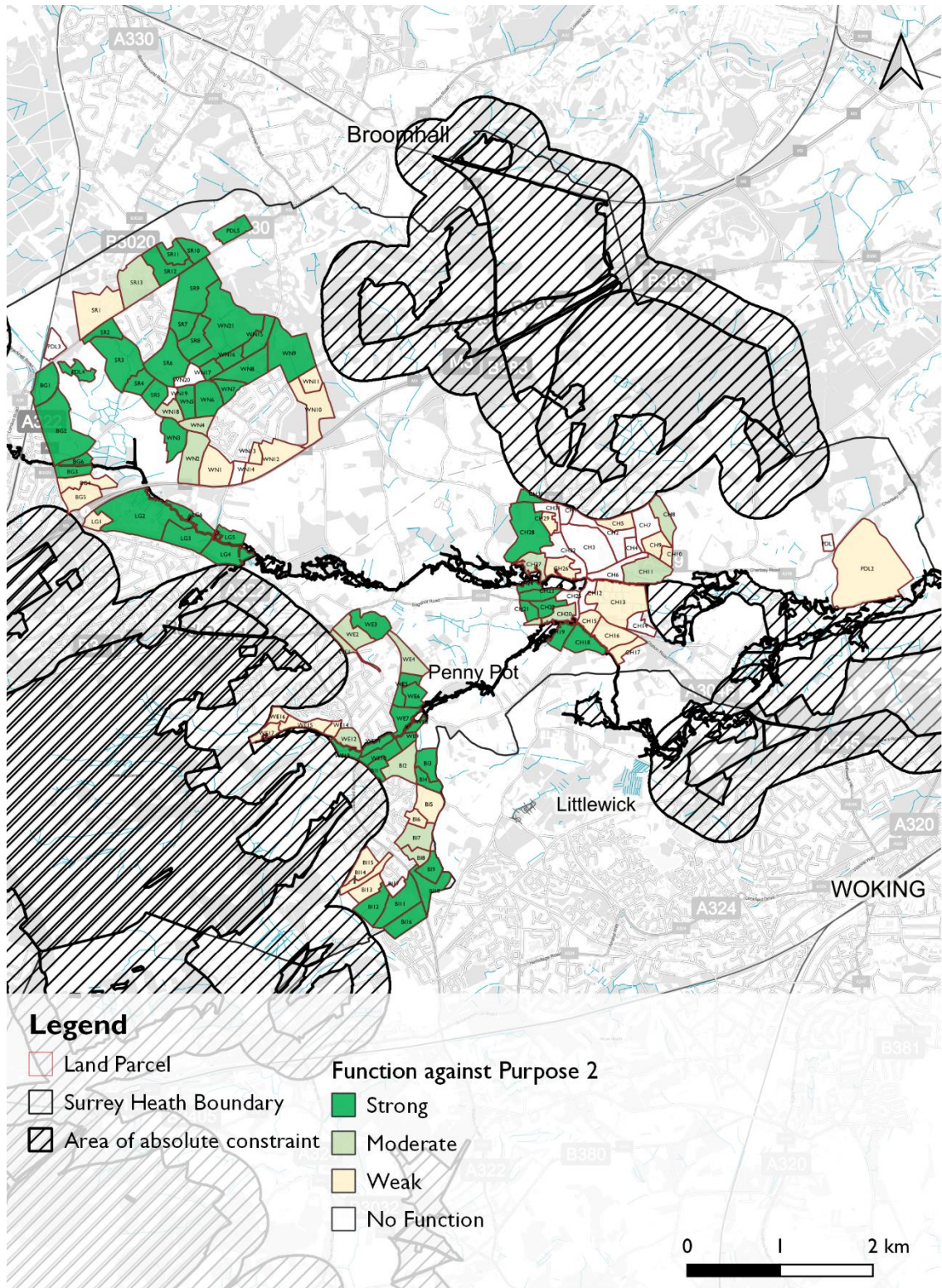


Figure 5: Results of the Purpose 2 Assessment



**Purpose 3: To assist in safeguarding the countryside from encroachment**

- 4.18. Figure 6 shows how each parcel is considered to function in respect of safeguarding the countryside from encroachment. The methodology identifies that the strongest performing parcels are expected to possess the characteristics of the open countryside.
- 4.19. The parcels assessed generally function strongly against Purpose 3 of the Green Belt, with many parcels, particularly around West End, Bisley and Lighwater, identified as having a strong, open character. Elsewhere, particularly around Windlesham, Snows Ride and Chobham there are a number of parcels that are identified as functioning less well against Purpose 3 as a result of their developed characteristics.
- 4.20. In line with the findings of the 2017 Study, a number of land parcels within the centre of Chobham were not considered to exhibit the characteristics of the countryside.
- 4.21. Of the Previously Developed Land parcels considered through the assessment, none were considered to have no function. However, four were recognised as having a weak function, owing to the extensive development contained within them. Land within SR3, which comprises an industrial estate and school was found to have a moderate function against Purpose 3, with development in this location being relatively open textured.



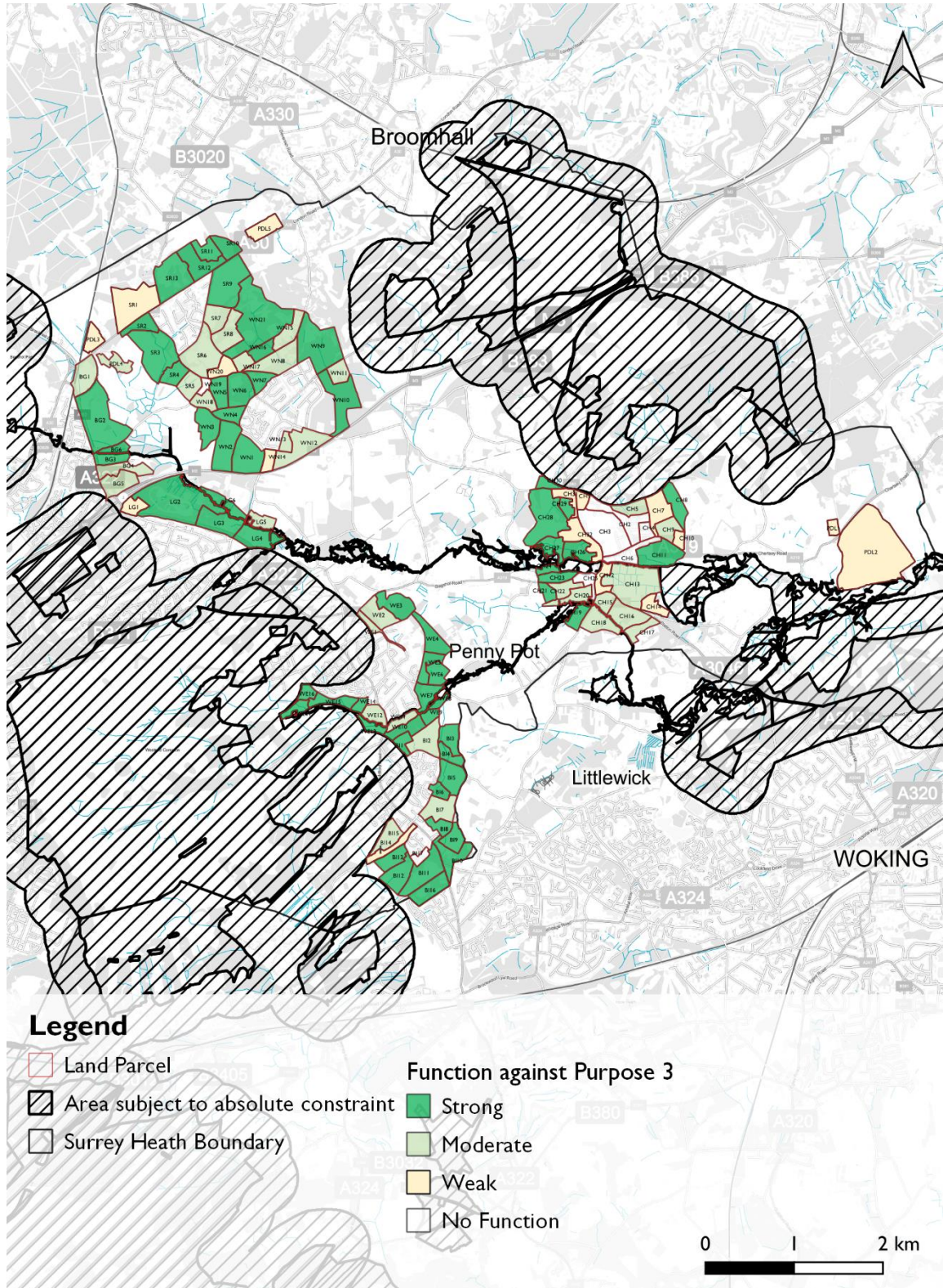


Figure 6: Results of the Purpose 3 assessment



**Purpose 4: To preserve the setting and special character of historic settlements**

- 4.22. In line with the methodology set out in Section 3 the only historic settlements within and surrounding the study area which were identified as having significant inter-visibility with Green Belt in Surrey Heath were considered to be Chobham and Bagshot. Figure 7 shows how each parcel is considered to function in respect of Purpose 4.
- 4.23. The vast majority of the parcels assessed did not contribute to Purpose 4. Modern development is situated to the north east of Chobham, disconnecting the historic parts of the settlement from the open countryside. As a result, parcels to the north east of Chobham were not considered to contribute to the setting and special character of the historic settlement.
- 4.24. To the north, east and west of Chobham, the relationship between the historic parts of the settlement and the surrounding countryside is significantly stronger. The countryside in a number of parcels provides a rural setting to footpaths and highways that run into the heart of the settlement. Parcel CH13 is considered to be particularly important, with a significant degree of intervisibility between the historic core, including the cricket pitch and St Lawrence's Church and the wider countryside.
- 4.25. No Green Belt parcels are considered to contribute to the setting and special character of Bagshot, with no inter-visibility between land designated as Green Belt and the historic parts of Bagshot owing to topography and the presence of more modern development between the historic parts of Bagshot and the Green Belt.



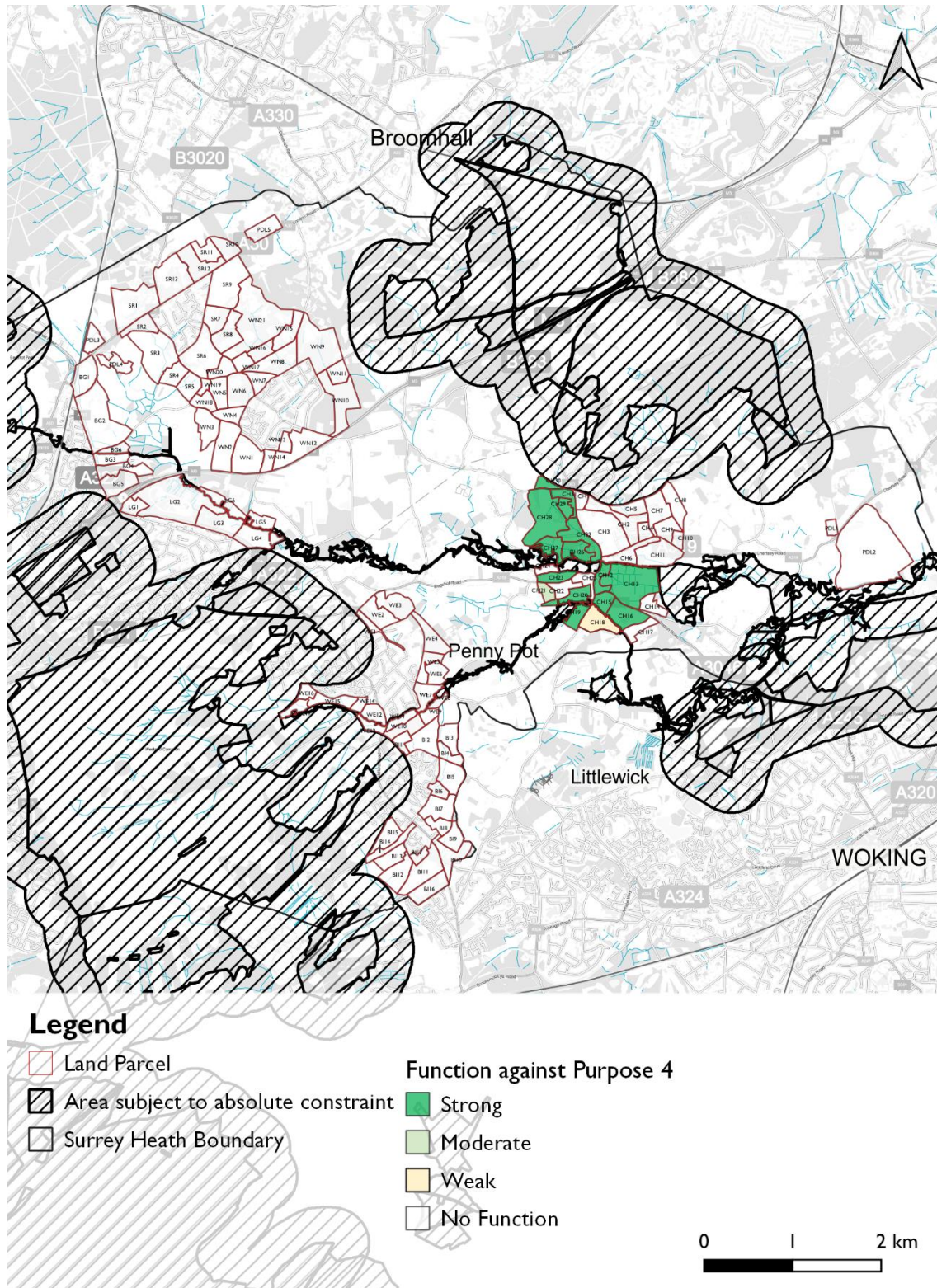


Figure 7: Results of the Purpose 4 assessment



### Overall Level of Function

- 4.26. The final stage of the Part I assessment provides an overall rating for the level of function of the Green Belt parcels assessed against Purposes 1 – 4 of the Green Belt as set out in the National Planning Policy Framework (NPPF).
- 4.27. The overall findings are set out across Figures 8 - 10. From the Figures, it can be seen that there are two particular concentrations of land parcels that function particularly strongly against the Purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF), with these areas being identified as having a very high function against the purposes of the Green Belt.
- 4.28. Concentrations of highly functioning parcels are also found around the Borough's more northerly settlements, including between and around the settlements of Windlesham and Windlesham (Snows Ride), where the narrow gaps between settlements are fragile, and to the east of the A322, which itself generally forms a demonstrably strong Green Belt boundary.
- 4.29. There are also areas of Green Belt land that is considered to function less strongly; most notably to the south of Windlesham where land is contained between the M3 motorway and the settlement, to the south west of West End, where the landscape and policy designations are relatively containing and to the south east and the west of Bisley, where the existing settlement has a degree of urbanising influence.
- 4.30. The most notable concentration of low functioning Green Belt land lies within the existing washed over Green Belt settlement area of Chobham, which in many areas is built up with little to indicate that the settlement falls within the Green Belt. There are other pockets of low functioning Green Belt scattered throughout the wider assessment area, often reflecting small pockets of relatively intensive development uncharacteristic of the Green Belt.



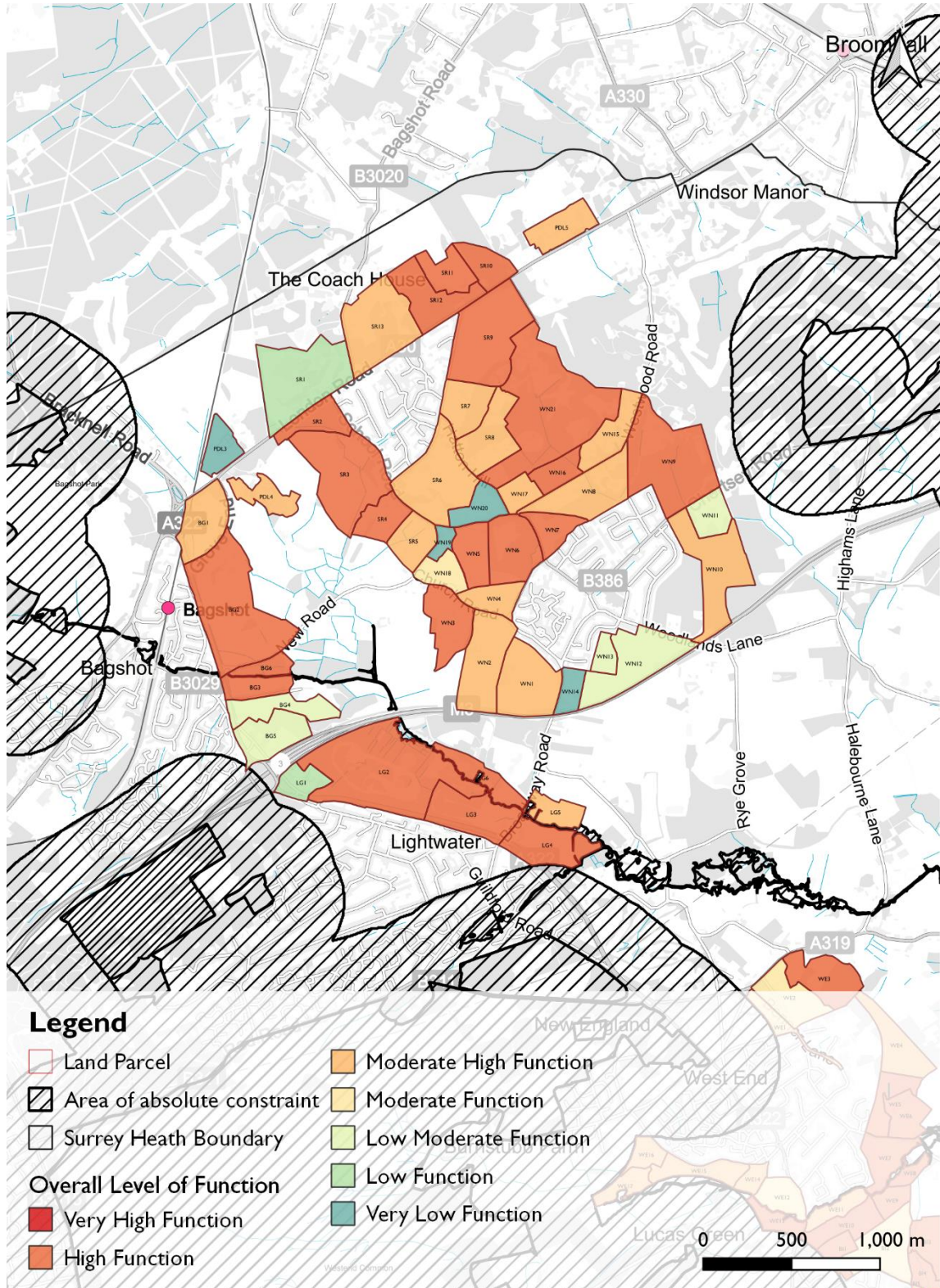


Figure 8: Overall function of Green Belt land (northern parcels)





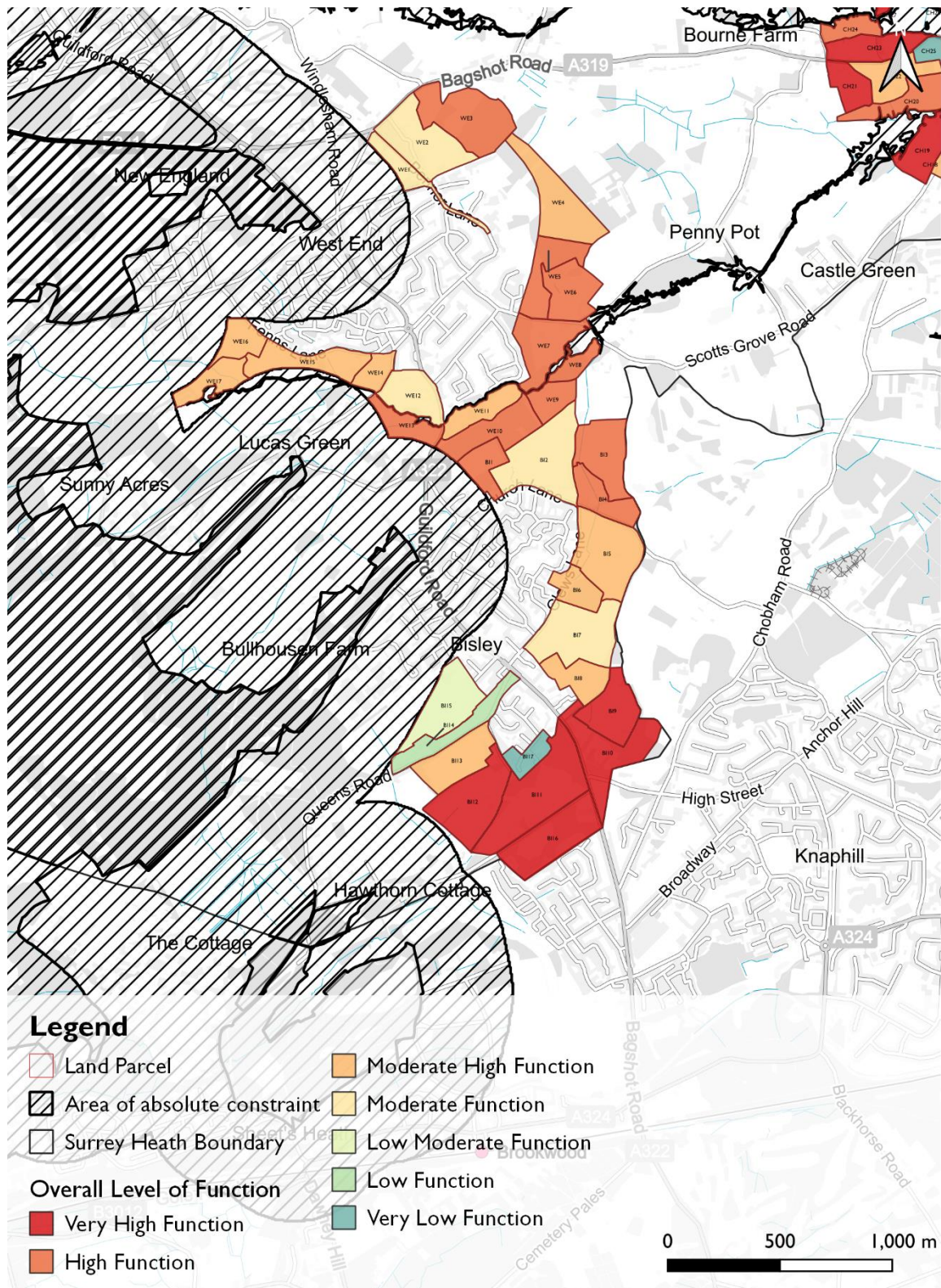


Figure 9: Overall function of Green Belt land (southern parcels)



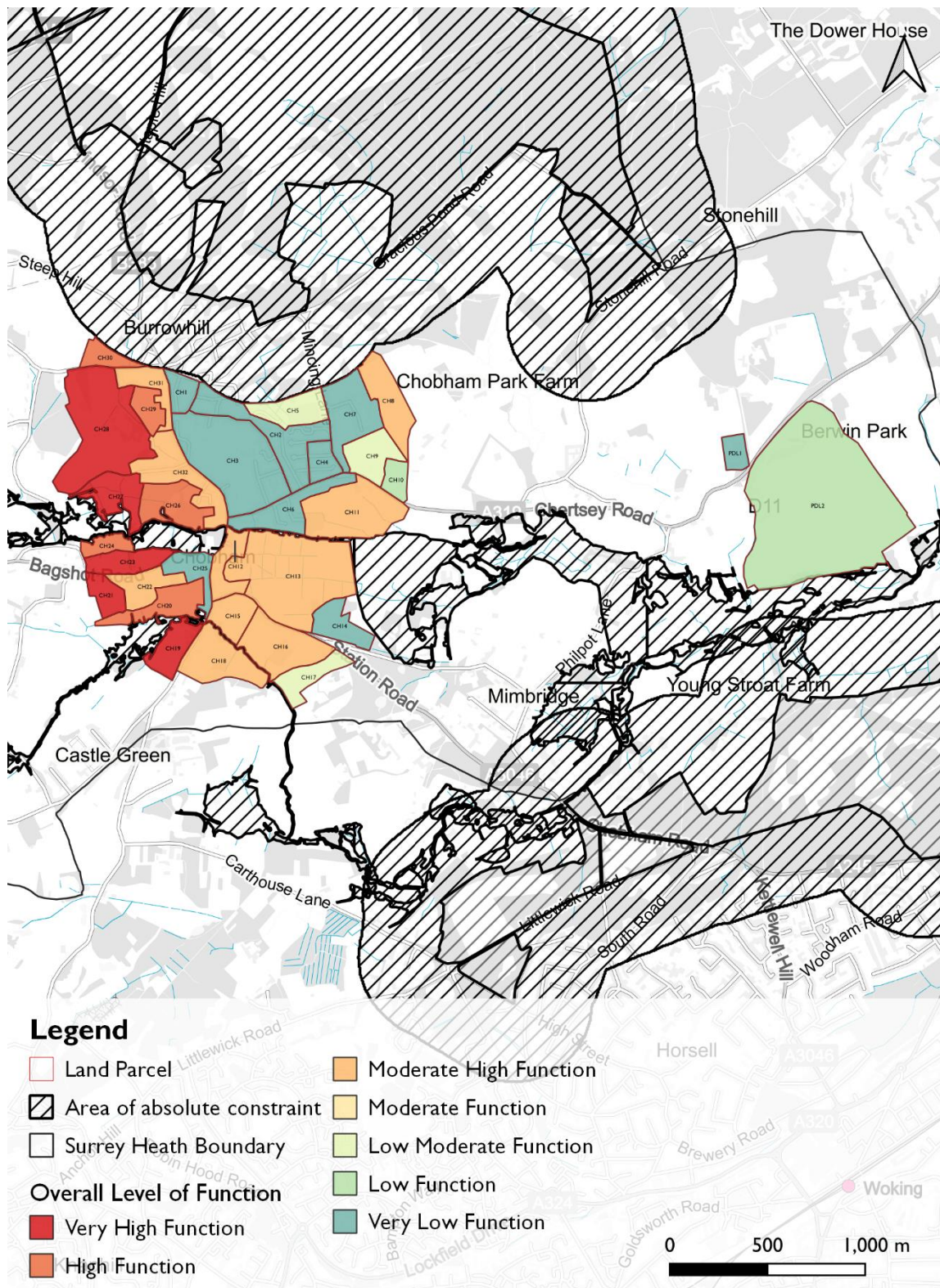


Figure 10: Overall function of Green Belt land (eastern parcels)



## Findings of Part 2: Wider Impact Study

- 4.31. The Wider Impact Study seeks to identify how the removal of parcels from the Green Belt would affect the integrity of the wider Green Belt.
- 4.32. At Stage 1, consideration was given to the potential impact arising from the individual release of parcels. The assessment under Stage 1 shared some similarities to the findings of the overarching Green Belt function assessment in that parcels situated between Bisley and Woking, Windlesham and Windlesham (Snows Ride) and to the west of Chobham were all identified as having the highest risk to the integrity of the wider Green Belt in the event that parcels were removed from its general extent. In the case of parcels to the south of Bisley, the risk was principally attributed to the likelihood of land release resulting in increased containment of neighbouring land. In respect of settlements at Windlesham and Chobham, the presence of a higher sensitivity landscape and ribbon development, in addition to a relatively open textured landscape were considered to be key factors.
- 4.33. Because all Previously Developed parcels are located some distance from neighbouring settlements, these were, by virtue of the assessment criteria, considered as posing a higher risk to the integrity of the Green Belt in the event of release.
- 4.34. The only parcels identified as having a negligible risk to the wider Green Belt were those falling within central Chobham. It was considered that these parcels had already been developed to such a density that the land already has an urban/rural relationship with the wider Green Belt around it.
- 4.35. Parcels identified as having a moderate or lower risk to the integrity of the wider Green Belt in the event of release were found throughout the study area and did not accumulate particularly significantly in any given location.
- 4.36. Findings of the Part 2, Stage 1 Study are set out in Figure 11.



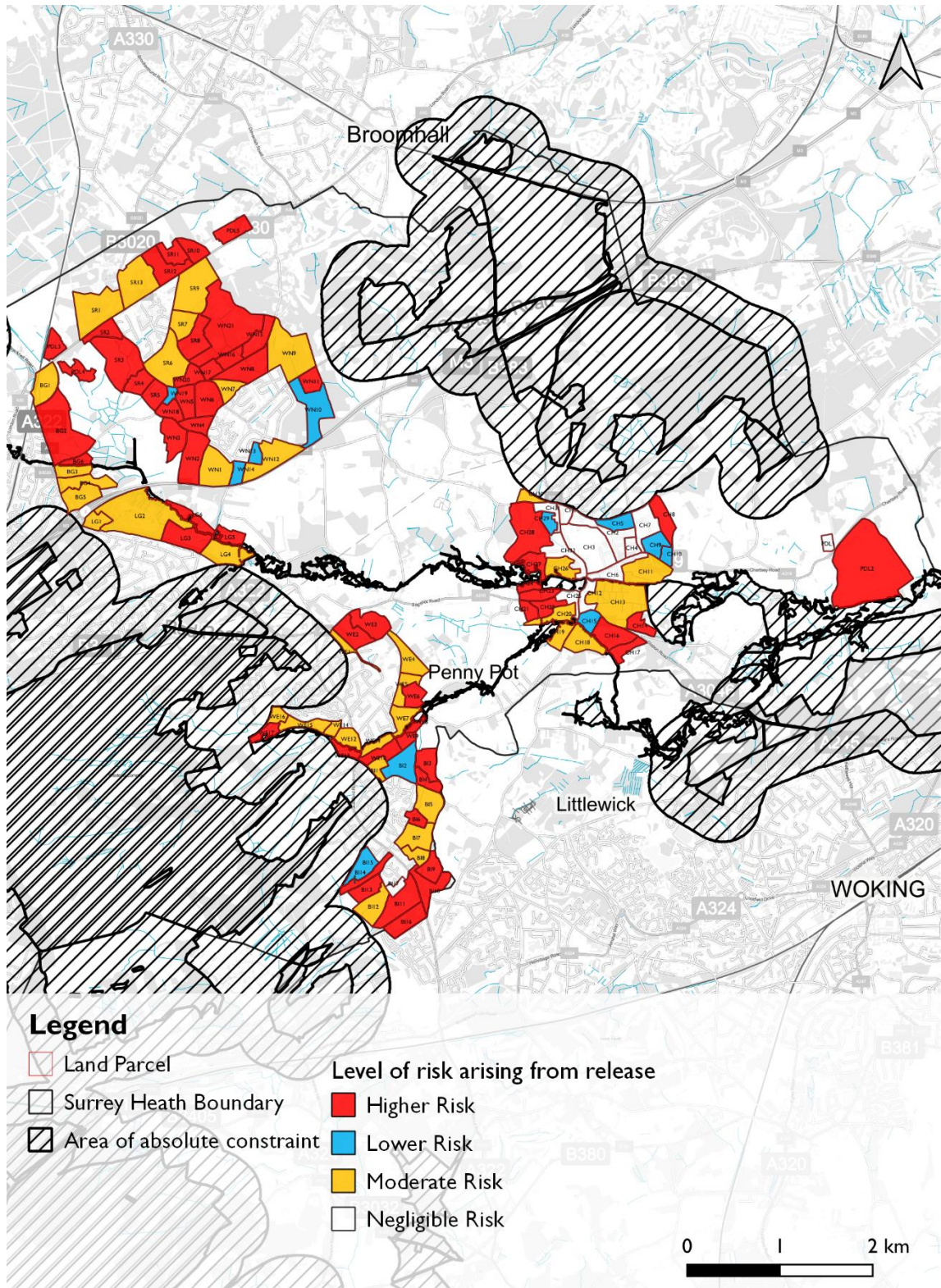


Figure 11: Results of the Part 2 Stage 1 Study



- 4.37. Under the Part 2, Stage 2 assessment, it was considered that, if released in conjunction with other neighbouring parcels, the risk of release arising from 17 parcels would be lessened. Of note were the following findings:
- If released in conjunction, parcels WE12, WE14 – WE16 would move from having a moderate risk to the integrity of the wider Green Belt, to having a lower risk. To the eastern and north western ends of the grouping of parcels, land would be well contained by the existing settlement and to the south west, the landscape, in addition to the Thames Basin Heaths Special Protection Area and associated buffer would have a containing effect on development in itself. Field boundaries and Trulley Brook would all provide reasonable alternative Green Belt boundaries.
  - If released in conjunction, parcels at B15 – B18 would reduce from having a moderate risk to the integrity of the wider Green Belt, to having a lower risk. A wider release here would have no notable containing impact on adjoining land and would be well contained in itself by field boundaries and highways.
  - If released in conjunction, parcels BG3 – BG5 would cumulatively result in a lower risk to the integrity of the wider Green Belt, with less likelihood of the containment of neighbouring land.
  - Parcel WNI2 would, if released in conjunction with WNI3 and WNI4 be very well contained by the existing settlement and would benefit from a strong boundary in the M3/ Likewise, Release of land in WNI1 alongside WNI10 would connect that parcel to the settlement and development in this area would be well contained by the surrounding wooded environment.
- 4.38. Three parcels at BG2, CH8 and BG4 would reduce from having a higher risk to a moderate risk to the integrity of the wider Green Belt, if released in conjunction with neighbouring parcels.
- 4.39. Because all Previously Developed parcels are located some distance from neighbouring settlements, it was not considered that there was any way in which to lessen the risk of release to the wider Green Belt by these were, by virtue of the assessment criteria, considered as posing a higher risk to the integrity of the Green Belt in the event of release in conjunction with other Green Belt land under the terms of the assessment.

Findings of the Part 2, Stage 2 Study are set out in Figure 12, which shows the adjusted parcels in isolation and in Figure 13, which shows the cumulative findings of Stage 1 and Stage 2.



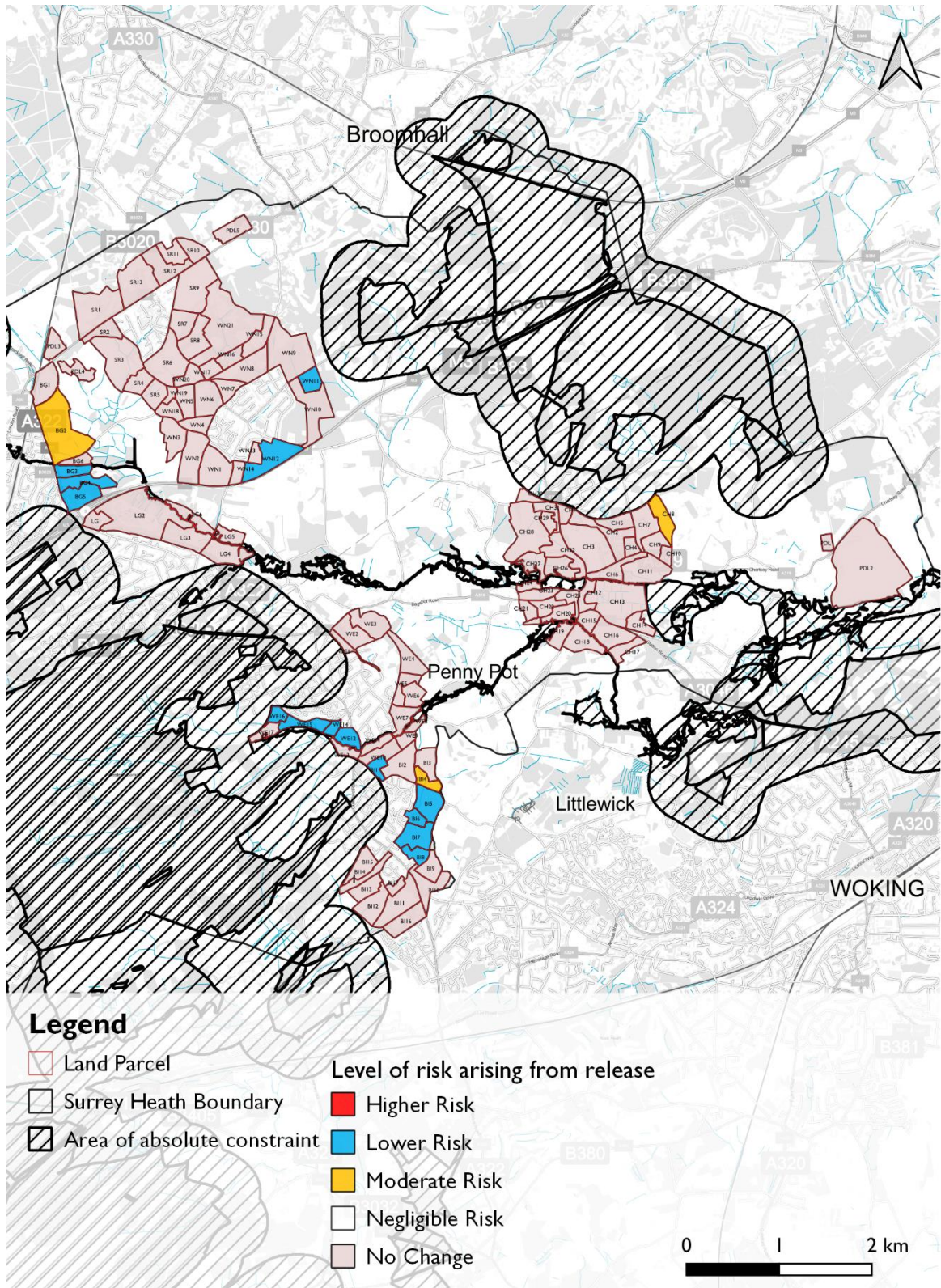


Figure 12: Results of the Part 2 Stage 2 Study



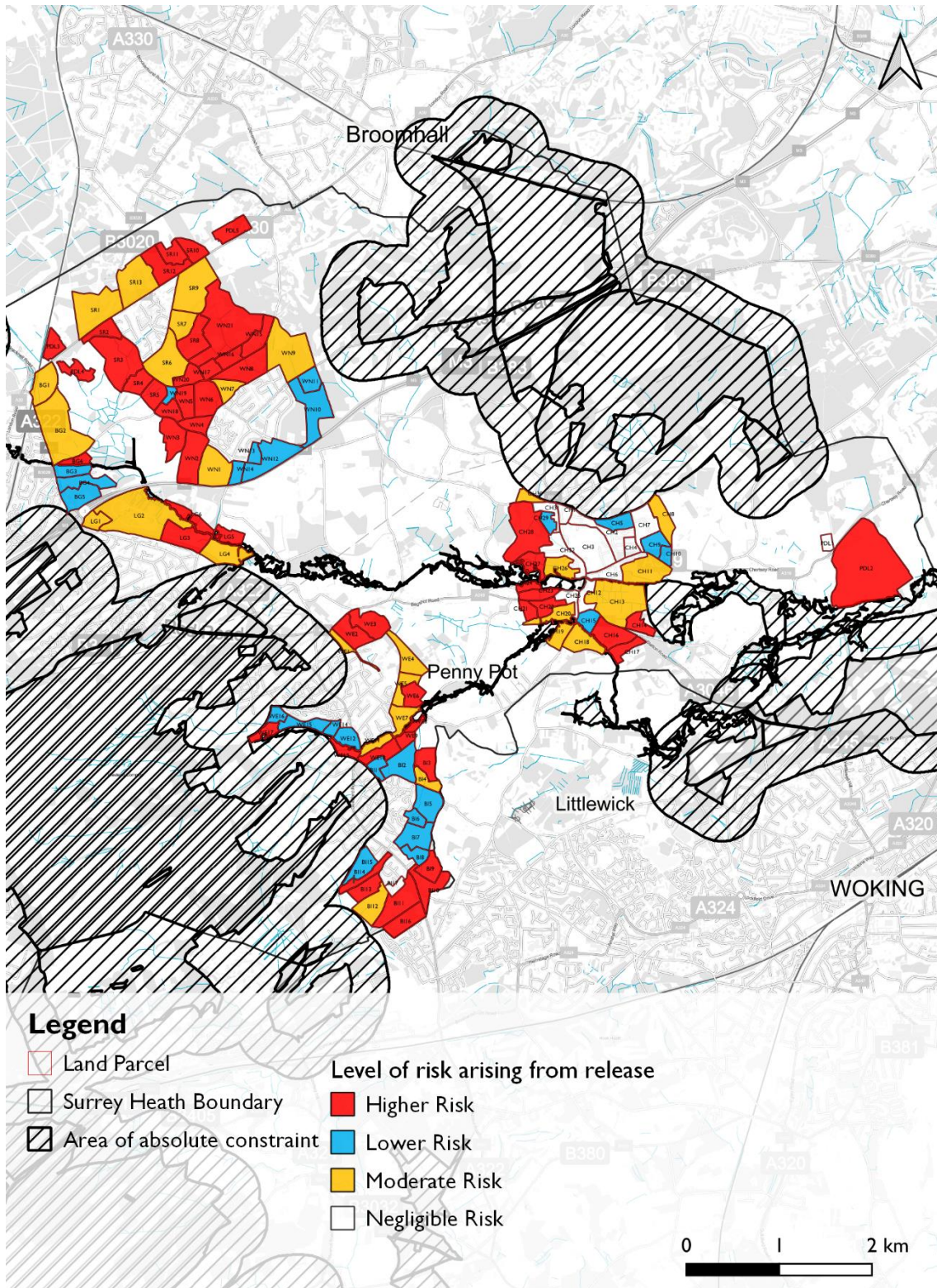


Figure 13: Cumulative results of the Part 1 and Part 2 assessments



## 5. Next Steps

### Introduction

- 5.1. This Green Belt Review has provided a detailed assessment of how previously developed land and land surrounding (and in the case of Chobham, also within) the Borough's Green Belt settlements functions against the purposes of the Green Belt as set out within the National Planning Policy Framework (NPPF), in addition to giving an indication of the implications for the wider Green Belt in the event land is released from its general extent.
- 5.2. As part of the development of a sound spatial strategy for the Local Plan, the Council will, through the remainder of the Local Plan preparation process, need to give careful consideration as to whether there are exceptional circumstances to warrant an alteration to Green Belt boundaries. It should also be noted that the consideration of exceptional circumstances is an iterative process that should be returned to at various stages of the Plan making process, with regard had to a developing evidence base. The following section sets out how exceptional circumstances will be considered.

### Considering whether exceptional circumstances exist to warrant changes to Green Belt boundaries

- 5.3. Prior to concluding that 'exceptional circumstances' exist to justify changes to the Green Belt, Paragraph 141 of the NPPF states that local authorities should demonstrate that all other 'reasonable options' for meeting its identified need for development have been considered. In particular local authorities need to consider whether their strategy:
  - makes effective use of suitable brownfield sites and underutilised land;
  - optimises the density of development in town and city centres and other locations well served by public transport; and
  - explores whether other authorities can help to meet some of the identified development requirement.
- 5.4. Useful guidance on identifying 'exceptional circumstances' for making alterations to Green Belt boundaries is set out in the recent High Court judgement: *Compton Parish Council and others v Guildford Borough Council and others* (2019). The judge concluded:

*“There is no definition of the policy concept of ‘exceptional circumstances’ for altering Green Belt boundaries. This itself is a deliberate policy decision, demonstrating that there is a planning judgment to be made in all the circumstances of any particular case.”*





*“The ‘exceptional circumstances’ can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgment, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary...there will almost inevitably be an analysis of the nature and degree of the need, allied to consideration of why the need cannot be met in locations which are sequentially preferable for such developments, an analysis of the impact on the functioning of the Green Belt and its purpose, and what other advantages the proposed locations, released from the Green Belt, might bring, for example, in terms of a sound spatial distribution strategy.”*

- 5.5. Elsewhere, Case Law emphasises the importance of demonstrating exceptional circumstances at both a strategic and local level<sup>24</sup>.
- 5.6. In making the assessment of whether exceptional circumstances exist to warrant an alteration to Green Belt boundaries at a strategic level, planning judgement will be used with regard had to relevant Policy, Case Law and all available and relevant evidence as appropriate. The following information and evidence will be particularly relevant in drawing to a robust conclusion in respect of whether exceptional circumstances exist at both strategic and local levels:
- The Government’s standard method for assessing local housing need;
  - The Employment Land Review (ELR);
  - The Gypsy and Traveller Accommodation Assessment (GTAA);
  - The outcomes of Duty to Co-operate discussions;
  - The Strategic Land Availability Assessment (SLAA);
  - The Sustainability Appraisal (SA);
  - This Green Belt Review (including the Sustainability Assessment) and other Green Belt evidence including the Green Belt and Countryside Study (GBCS) and Chobham Village Green Belt Boundaries Study (CVGBBS).
- 5.7. Consideration of the above evidence and information in the round will enable the Council to use planning judgement to draw to robust conclusions on whether exceptional circumstances exist at a strategic level. It will also help the Council to make decisions about where Green Belt release should occur, if this is deemed necessary.

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<sup>24</sup> Inspector (Jonathan Bore) Examination of the Guildford Borough Local Plan: Strategy and Sites, Inspector's Questions and Comments (No. 1) (23 March 2018)



- 5.8. Where Green Belt release is considered justified, the findings of this Study will be a key consideration in deciding where release should occur. In respect of how the findings of the Study will be used, the Council considers that from a Green Belt perspective, it would be preferable to release land which the Study identifies as having lower function against the Green Belt purposes and that poses a lower risk to the integrity of the wider Green Belt in the event of release (see Figure 14). Release of such areas are likely to cause least harm to the Green Belt. Conversely, it would be preferable to retain within the Green Belt areas the Study identifies as having a high level of function against the Green Belt purposes and that represent a high risk to the integrity of the wider Green Belt in the event of release. Release of such areas are likely to result in the greatest harm to the Green Belt.
- 5.9. However, whilst preferable to minimise harm to the Green Belt, wider factors of suitability and sustainability also need to be factored into the decision-making process.
- 5.10. In respect of sustainability, Paragraph 142 of the National Planning Policy Framework emphasises that when revising Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. The Green Belt Review Sustainability Assessment provides evidence in respect of the sustainability credentials of relative areas of the Green Belt that can be factored into the consideration of where land could be released from the Green Belt.
- 5.11. In respect of suitability, where Green Belt release is being driven by development needs, it is important to recognise that land should generally be identified as being available and suitable for development. If it is not, it is unlikely that local level exceptional circumstances for release can be adequately justified. The Strategic Land Availability Assessment (SLAA) will help the Council develop a robust understanding of where land is available for development.
- 5.12. It is important to note that the most sustainable areas of the Green Belt, or those areas that are most suitable for development, are those that will result in the highest harm to the Green Belt in the event of their release. Planning judgement will therefore be required to draw to a conclusion on whether the sustainability benefits and suitability of Green Belt release and the associated development outweigh the harm to the Green Belt designation.



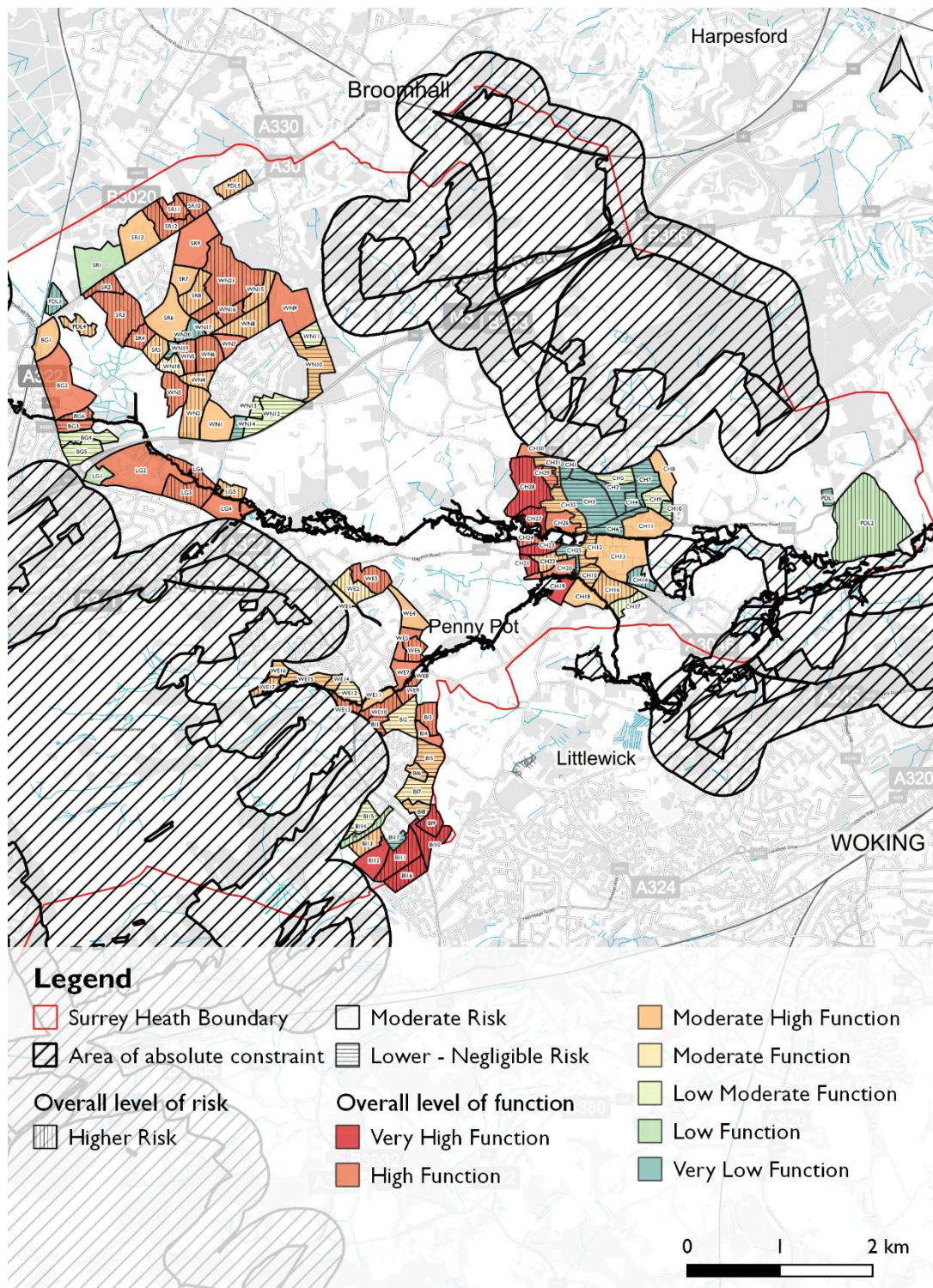


Figure 14: Cumulative results of Part 1 and Part 2 Assessments



- 5.13. In view of this, when considering the risks and benefits of removing land from the Green Belt at the local level, consideration should be given to whether potential harm to the Green Belt can be reduced or ameliorated. This will be particularly relevant to cases where land identified within this Study has been identified as having a high level of function against the Green Belt purposes and/or a high risk to the integrity of the wider Green Belt in the event of its release. The extent to which harm can be mitigated will vary from site to site and will depend on the specifics of each case. Mitigation may include (but is not limited to):
- Addressing the nature of the boundary at the point at which rural and urban areas meet – for example, boundaries could be strengthened, and new landscaping integrated at weak points to reduce opportunities for sprawl and to enable a clear distinction between rural and urban areas;
  - Release of smaller or larger areas of land may result in more effective containment of development or more robust boundaries;
  - Considering the ownership and management of landscape elements – for Surrey Heath, requirements to provide Suitable Alternative Natural Green Space may provide an opportunity to secure areas of open land and would offer greater security of landscape features and screening beyond land in private ownership (for example, in back gardens); and,
  - Using building scale and density to create a transition from urban to rural in order to reduce the perception of urbanisation.
- 5.14. The Council’s Landscape Sensitivity Assessment provides useful evidence which will assist in identifying site specific opportunities for mitigation of harm.
- 5.15. Finally, consideration of the opportunities provided by each release to enhance the beneficial use of the Green Belt should be factored into decision making in respect of where to amend Green Belt boundaries. This is a requirement of the National Planning Policy Framework (NPPF), which advises at Paragraph 145:
- “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”*
- 5.16. Table 7 sets out the beneficial uses of the Green Belt as defined in the NPPF and given an indication of the potential ways that beneficial use can be secured. The opportunities presented by release of land within the Green Belt to increase the beneficial use of remaining Green Belt land is likely to vary from site to site, and like mitigation of harm, will depend on the specifics of each case.



Beneficial Use	Considerations
Improving access	Enhancing coverage and condition of the rights of way network and increasing open space provision, including for Suitable Alternative Natural Green space.
Providing locations for outdoor sport	Some outdoor sports can represent an urbanising influence – for example where floodlighting and extensive infrastructure is required to support the use. Emphasis should be placed on sports and activities that do not require formal facilities is less likely to harm the Green Belt
Retaining and enhancing landscapes and visual amenity	The Surrey Heath Landscape Sensitivity Assessment provides useful guidance on the enhancement of the Borough’s landscapes, with appropriate measures likely to vary between areas. Consideration should be given to key views within, into and out of rural areas.
Increasing Biodiversity	Most Green Belt land has potential for increased biodiversity value, e.g. the management of hedgerows and agricultural field margins, the restoration of habitats and provision of habitat connectivity. There may also be significant potential to link enhancements with policy requirements to deliver ‘biodiversity net gain’ associated with development proposals.
Climate Change mitigation and adaptation	Tree planting and re-wilding projects can create new carbon sinks. Furthermore, increasing the density and biodiversity of the Borough’s flora can combat the urban heat island effect of the large built-up areas and flood risk.
Improving damaged and derelict land	Giving land a functional, economic value is a key aspect in avoiding damage and dereliction through lack of positive management, but this needs to be achieved with minimum harm to the characteristics / qualities which help it contribute to Green Belt purposes.

Table 7: Beneficial uses of Green Belt land



- 5.17. In considering the effects of Green Belt release on a localised basis, it is noted that there may be numerous permutations of combinations of parcels that could be considered for release in conjunction. If this is the case, consideration should be given to the cumulative impact of the release of multiple parcels upon the Green Belt as a whole.



## Annex I: Table of Overall Findings

REF	NAME	Part I Assessment				Overall Rating	Part 2 Assessment	
		P1	P2	P3	P4		Stage A	Stage B
BG1	Land at Grove End	None	Strong	Mod	None	Moderate High Function	Moderate Risk	N/A
BG2	Land at Windlesham Golf Course, to the east of the A322 Guildford Road	None	Strong	Strong	None	High Function	Higher Risk	Moderate Risk
BG3	Land North of Swift Lane	None	Strong	Strong	None	High Function	Moderate Risk	Lower Risk
BG4	Land to the south of Swift Lane and to the east of Guildford Road	None	Weak	Mod	None	Low Moderate Function	Moderate Risk	Lower Risk
BG5	Land to the north of the M3 and to the east of the Guildford Road	None	Weak	Mod	None	Low Moderate Function	Moderate Risk	Lower Risk
BG6	Land South of New Road	None	Strong	Strong	None	High Function	Higher Risk	N/A
BI1	Land at Lion Park, off Church Lane	None	Strong	Strong	None	High Function	Moderate Risk	Lower Risk
BI2	Land at Hawk and Springfield Farms	None	Mod	Mod	None	Moderate Function	Lower Risk	N/A
BI3	Land at Chobham Golf Course	None	Strong	Strong	None	High Function	Higher Risk	N/A
BI4	Fields to the north of Church Lane	None	Strong	Strong	None	High Function	Higher Risk	Moderate Risk



B15	Land to the south of Church Lane	None	Weak	Strong	None	Moderate High Function	Moderate Risk	Lower Risk
B16	Woodland to the east of Clews Lane	None	Weak	Strong	None	Moderate High Function	Higher Risk	Lower Risk
B17	Fields south east of Clews Lane	None	Mod	Mod	None	Moderate Function	Moderate Risk	Lower Risk
B18	Land north west of Kiln Lane (footpath)	None	Mod	Strong	None	Moderate High Function	Moderate Risk	Lower Risk
B19	Land south east of Kiln Lane (footpath)	Strong	Strong	Strong	None	Very High Function	Higher Risk	N/A
B110	Land north of the junction between Guildford Road and Limecroft Road	Strong	Strong	Strong	None	Very High Function	Higher Risk	N/A
B111	Land at Bisley Common, north of Stafford Lake	Strong	Strong	Strong	None	Very High Function	Higher Risk	N/A
B112	Land at Strawberry Farm	Strong	Strong	Strong	None	Very High Function	Moderate Risk	N/A
B113	Land at Miles Green Farm	None	Weak	Strong	None	Moderate High Function	Higher Risk	N/A
B114	Common Land and housing north west of Queens Road, at Miles Green	None	Weak	Weak	None	Low Function	Higher Risk	N/A
B115	Land at Ramsbrook Farm	None	Weak	Mod	None	Low Moderate Function	Lower Risk	N/A
B116	Land at Bisley Common, south of Stafford Lake	Strong	Strong	Strong	None	Very High Function	Higher Risk	N/A
B117	Land at Jopling Road	None	None	None	None	Very Low Function	Negligible Risk	N/A
CH1	Land at Oakhurst	None	None	Weak	None	Very Low Function	Negligible Risk	N/A
CH2	Land North of Burr Hill Lane	None	None	None	None	Very Low Function	Negligible Risk	N/A





	and East of Delta Road							
CH3	Land between Windsor Road and Delta Road	None	None	None	None	Very Low Function	Negligible Risk	N/A
CH4	Land east of Brookleys	None	None	None	None	Very Low Function	Negligible Risk	N/A
CH5	Land west of Mincing Lane	None	Weak	Mod	None	Low Moderate Function	Lower Risk	N/A
CH6	Land east of High Street and south of Chertsey Road	None	None	None	None	Very Low Function	Negligible Risk	N/A
CH7	Land at the Avenue	None	None	Weak	None	Very Low Function	Negligible Risk	N/A
CH8	Land north east of The Avenue	None	Mod	Strong	None	Moderate High Function	Higher Risk	Moderate Risk
CH9	Land to the north of Chertsey Road	None	Weak	Mod	None	Low Moderate Function	Lower Risk	N/A
CH10	Land to the west of Chobham Park Lane	None	Weak	Weak	None	Low Function	Lower Risk	N/A
CH11	Land to the south of Chertsey Road, Chobham	None	Mod	Strong	None	Moderate High Function	Moderate Risk	N/A
CH12	Land east of High Street and north Station Road	None	None	Weak	Strong	Moderate High Function	Negligible Risk	N/A
CH13	Land at Chobham Meadows and Flexlands Farm	None	Weak	Mod	Strong	Moderate High Function	Moderate Risk	N/A
CH14	Land North of Sandpit Hall Road	None	None	Weak	None	Very Low Function	Higher Risk	N/A
CH15	Land at Chobham Recreation Ground	None	Weak	Mod	Strong	Moderate High Function	Lower Risk	N/A



CH16	Land south of Station Road and north west of Broadford Lane Path	None	Weak	Mod	Strong	Moderate High Function	Higher Risk	N/A
CH17	Land South of Station Road and South East of Broadford Lane Path	None	Weak	Mod	None	Low Moderate Function	Higher Risk	N/A
CH18	Land South East of Castle Grove Road	None	Strong	Mod	Weak	Moderate High Function	Moderate Risk	N/A
CH19	Land North West Castle Grove Road	None	Strong	Strong	Strong	Very High Function	Moderate Risk	N/A
CH20	Land West of Castle Grove, North of the Bourne	None	Mod	Mod	Strong	High Function	Moderate Risk	N/A
CH21	Land South of Vicarage Road	None	Strong	Strong	Mod	Very High Function	Higher Risk	N/A
CH22	Land at Chobham Park Farm	None	Strong	Mod	None	Moderate High Function	Higher Risk	N/A
CH23	Land North of Vicarage Road	None	Strong	Strong	Strong	Very High Function	Higher Risk	N/A
CH24	Land South of the Millbourne, East of Clappers Lane	None	Strong	Strong	None	High Function	Higher Risk	N/A
CH25	Land west of the High Street, South of Bagshot Road	None	None	None	None	Very Low Function	Negligible Risk	N/A
CH26	Land West Windsor Road, South of Leslie Road	None	Weak	Strong	Strong	High Function	Moderate Risk	N/A
CH27	Land to the north of the Millbourne	None	Mod	Strong	Strong	Very High Function	Higher Risk	N/A
CH28	Land North of Leslie Road at Leslie Farm and Burrow Hill Nurseries	None	Strong	Strong	Strong	Very High Function	Higher Risk	N/A



CH29	Land South of Windlesham Road and West of Windsor Road	None	Weak	Strong	Strong	High Function	Lower Risk	N/A
CH30	Land North of Windlesham Road	None	Strong	Strong	Strong	High Function	Moderate Risk	N/A
CH31	Land west of Windsor Road, south of Windlesham Road	None	None	Weak	Strong	Moderate High Function	Negligible Risk	N/A
CH32	Land west of Windsor Road incorporating Leslie Road	None	None	Weak	Strong	Moderate High Function	Negligible Risk	N/A
LG1	Land to the south of the M3 and to the north east of Guildford Road	None	Weak	Weak	None	Low Function	Moderate Risk	N/A
LG2	Land at Windlesham Arboretum	None	Strong	Strong	None	High Function	Moderate Risk	N/A
LG3	Land to the north west of Broadway Road and to the north east of the A322 Guildford Road	None	Strong	Strong	None	High Function	Higher Risk	N/A
LG4	Land to the south east of Broadway Road and north east of the A322 Guildford Road	None	Strong	Strong	None	High Function	Moderate Risk	N/A
LG5	Land at Broadway Green and Windlebrook Farms	None	Strong	Mod	None	Moderate High Function	Higher Risk	N/A
LG6	Land South of Oldhouse Lane	None	Strong	Strong	None	High Function	Higher Risk	N/A
PDL1	Chobham Business Centre	None	None	Weak	None	Very Low Function	Negligible Risk	N/A



PDL2	Fairoaks Airport	None	Weak	Weak	None	Low Function	Higher Risk	N/A
PDL3	Longacres Garden Centre	None	None	Weak	None	Very Low Function	Higher Risk	N/A
PDL4	Hall Grove School and Industrial Estate	None	Strong	Mod	None	Moderate High Function	Higher Risk	N/A
PDL5	Hilliers and Windlesham Garden Centres	None	Strong	Weak	None	Moderate High Function	Higher Risk	N/A
SR1	Land to the north of the A30 London Road and to the west of the B3020 Sunninghill Road	None	Weak	Weak	None	Low Function	Moderate Risk	N/A
SR2	Woodland south of A30 London Road	None	Strong	Strong	None	High Function	Higher Risk	N/A
SR3	Land at Windlesham Golf Course, south west of School Road	None	Strong	Strong	None	High Function	Higher Risk	N/A
SR4	Land to the south west of School Road	None	Strong	Strong	None	High Function	Higher Risk	N/A
SR5	Land to the south west of School Road and to the west of Church Road	None	Strong	Mod	None	Moderate High Function	Higher Risk	N/A
SR6	Land to the south east of Snows Ride and to the north east of School Road	None	Strong	Mod	None	Moderate High Function	Moderate Risk	N/A
SR7	Land at Snows Ride Farm	None	Strong	Mod	None	Moderate High Function	Moderate Risk	N/A
SR8	Land to the north east of Hatton Hill	None	Strong	Mod	None	Moderate High Function	Higher Risk	N/A
SR9	Land to the south of the	None	Strong	Strong	None	High Function	Moderate Risk	N/A



	A30 London Road and west of Snows Ride							
SR10	Woodland north east of Windlesham Hall	None	Strong	Strong	None	High Function	Higher Risk	N/A
SR11	Land at Windlesham Hall	None	Strong	Strong	None	High Function	Higher Risk	N/A
SR12	Woodland south west of Windlesham Hall	None	Strong	Strong	None	High Function	Higher Risk	N/A
SR13	Land to the north of the A30 London Road and to the east of the B3020 Sunninghill Road	None	Mod	Strong	None	Moderate High Function	Moderate Risk	N/A
WE1	Land South west of Benner Lane	None	Mod	Mod	None	Moderate Function	Moderate Risk	N/A
WE2	Land to the north of the junction between Benner Lane and Fairfield Lane	None	Mod	Mod	None	Moderate Function	Higher Risk	N/A
WE3	Land between Fairfield Lane and Bagshot Road	None	Strong	Strong	None	High Function	Higher Risk	N/A
WE4	Land south east of Fairfield Lane	None	Mod	Strong	None	Moderate High Function	Moderate Risk	N/A
WE5	Woodland to the east of the West End Reserve Site	None	Strong	Strong	None	High Function	Moderate Risk	N/A
WE6	Land to the north of Beldam Bridge Road	None	Strong	Strong	None	High Function	Higher Risk	N/A
WE7	Land at Beldam Bridge Farm	None	Strong	Strong	None	High Function	Moderate Risk	N/A



WE8	Woodland south east of the Bourne	None	Strong	Strong	None	High Function	Higher Risk	N/A
WE9	Open fields to the south of Oldhouse Lane	None	Strong	Strong	None	High Function	Higher Risk	N/A
WE10	Land south of Oldhouse Lane and east of Guildford Road	None	Strong	Strong	None	High Function	Higher Risk	N/A
WE11	Land to the south of the Bourne and to the east of Guildford Road	None	Strong	Mod	None	Moderate High Function	Moderate Risk	N/A
WE12	Land between Lucas Green Road and Guildford Road, north of the Bourne	None	Mod	Mod	None	Moderate Function	Moderate Risk	Lower Risk
WE13	Land between Lucas Green Road and Guildford Road, south of the Bourne	None	Strong	Strong	None	High Function	Higher Risk	N/A
WE14	Field between Fenns Lane and Lucas Green Road	None	Weak	Strong	None	Moderate High Function	Moderate Risk	Lower Risk
WE15	Land at Fenns Farm and Rosedene Farm	None	Weak	Strong	None	Moderate High Function	Moderate Risk	Lower Risk
WE16	Land at Rounce Farm, west of Fenns Lane	None	Weak	Strong	None	Moderate High Function	Moderate Risk	Lower Risk
WE17	Fields north of Trulley Brook	None	Weak	Strong	None	Moderate High Function	Higher Risk	N/A
WNI	Land south west of the junction between Church and Broadway Roads	None	Weak	Strong	None	Moderate High Function	Moderate Risk	N/A



WN2	Land south east of the junction between Church Road and Rectory Lane	None	Mod	Strong	None	Moderate High Function	Higher Risk	N/A
WN3	Land south west of the junction between Church Road and Rectory Lane	None	Strong	Strong	None	High Function	Higher Risk	N/A
WN4	Land between Church Road and Pound Lane	None	Mod	Strong	None	Moderate High Function	Higher Risk	N/A
WN5	Land south of Kennel Lane	None	Strong	Strong	None	High Function	Higher Risk	N/A
WN6	Land between Kennel Lane and Pound Lane	None	Strong	Strong	None	High Function	Higher Risk	N/A
WN7	Land at the Field of Remembrance	None	Strong	Strong	None	High Function	Moderate Risk	N/A
WN8	Land south of Westwood Road	None	Strong	Mod	None	Moderate High Function	Higher Risk	N/A
WN9	Land between Westwood Road and Chertsey Road	None	Strong	Strong	None	High Function	Moderate Risk	N/A
WN10	Land at Heathpark Wood (beyond the housing reserve site)	None	Weak	Strong	None	Moderate High Function	Lower Risk	N/A
WN11	Land at Oakwood	None	Weak	Mod	None	Low Moderate Function	Higher Risk	Lower Risk
WN12	Land south of Woodlands Lane and north west of the M3	None	Weak	Mod	None	Low Moderate Function	Moderate Risk	Lower Risk
WN13	Land south of Broadley Green	None	Weak	Mod	None	Low Moderate Function	Lower Risk	N/A
WN14	Land east of Broadway Road	None	None	Weak	None	Very Low Function	Lower Risk	N/A



WN15	Residential properties to the north of Westwood Road	None	Strong	Mod	None	Moderate High Function	Higher Risk	N/A
WN16	Woodland to the north of Westwood Road	None	Strong	Strong	None	High Function	Higher Risk	N/A
WN17	Land to the east of the junction between Hatton Hill and Kennel Lane	None	Strong	Mod	None	Moderate High Function	Higher Risk	N/A
WN18	Land north east of Church Road	None	Mod	Mod	None	Moderate Function	Higher Risk	N/A
WN19	Land south east of the Junction between Church Road and Kennel Lane	None	None	None	None	Very Low Function	Lower Risk	N/A
WN2	Land south east of the junction between Church Road and Rectory Lane	None	Mod	Strong	None	Moderate High Function	Higher Risk	N/A
WN20	Land west of the junction between Kennel Lane and Hatton Hill	None	None	Weak	None	Very Low Function	Higher Risk	N/A
WN21	Wooded land between Snows Ride and Windlesham	None	Strong	Strong	None	High Function	Higher Risk	N/A
WN3	Land south west of the junction between Church Road and Rectory Lane	None	Strong	Strong	None	High Function	Higher Risk	N/A
WN4	Land between Church Road and Pound Lane	None	Mod	Strong	None	Moderate High Function	Higher Risk	N/A
WN5	Land south of Kennel Lane	None	Strong	Strong	None	High Function	Higher Risk	N/A





WN6	Land between Kennel Lane and Pound Lane	None	Strong	Strong	None	High Function	Higher Risk	N/A
WN7	Land at the Field of Remembrance	None	Strong	Strong	None	High Function	Moderate Risk	N/A
WN8	Land south of Westwood Road	None	Strong	Mod	None	Moderate High Function	Higher Risk	N/A
WN9	Land between Westwood Road and Chertsey Road	None	Strong	Strong	None	High Function	Moderate Risk	N/A

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