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Surrey Heath Local Plan Appraisal of Sites

Green Belt Sites

Prepared by LUC
March 2018



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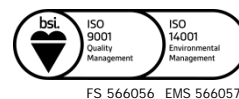
Green Belt Sites

Sites Appraisal
Prepared by LUC
March 2018

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1 Introduction

Background

- 1.1 LUC was commissioned to undertake an independent and robust appraisal of potential housing sites within the Borough. Surrey Heath Borough Council (SHBC) is preparing a new Local Plan for the Borough which will set out the strategies and policies that will guide the sustainable development of the Borough up to 2032. This study has been commissioned to assess the sustainability credentials of potential housing sites within the Green Belt. The site appraisals will be brought together with other evidence base documents to enable the Council to make an informed assessment of whether there are sustainable sites within the Green Belt that could help the Council meet its objectively assessed housing need.
- 1.2 The appraisals may also be used alongside other evidence based studies to draw to robust conclusions in respect of whether there are exceptional circumstances to warrant the alteration of Green Belt boundaries. For the avoidance of doubt, this study does not conclude if sites should be released from the Green Belt. Nor does it identify 'exceptional circumstances' for the release of land from the Green Belt. This will be for the Council to determine, with appropriate regard to wider evidence, and the outcomes of work undertaken under the Duty to Co-operate with neighbouring authorities.

Study aims and objectives

- 1.3 The overall aim of the study was to undertake a comprehensive review of the sustainability of a number of potential development sites outside of Surrey Heath's defined settlement area but within the Green Belt that may be suitable for housing.
- 1.4 In doing so, the objectives were:
 - To identify the physical and absolute (primary) environmental constraints to development within the Borough – these are constraints which preclude significant development.
 - To identify the non-absolute (secondary) environmental constraints to development – these are constraints which are sensitive but where significant development may not be precluded, particularly if appropriate mitigation is put in place.
 - To review the landscape sensitivity of the proposed sites to determine whether this constitutes an absolute or non-absolute constraint to development.
 - To review the findings of the Council's Green Belt and Countryside Study (2017) to establish how the performance of the sites against the purposes of Green Belt (as defined in the National Planning Policy Framework), compares with the performance of the parcels assessed in the Green Belt and Countryside Study.
 - To assess the accessibility of the sites in terms of proximity to key services and facilities e.g. education, transport, health, retail and leisure services.
 - To draw together the findings of the study to provide robust conclusions on the overall sustainability and achievability of development of the sites so that the Council, members of the public and elected members can clearly see how the different sites perform, thereby assisting with the preparation of the Local Plan and the decision-making process.

Local Plan context

- 1.5 The existing Surrey Heath Local Plan comprises of:
- The Core Strategy and Development Management Policies Development Plan Document and Policies Map, adopted February 2012 and covering the plan period from 2011-2028.
 - Camberley Town Centre Area Action Plan, adopted July 2014 and covering the plan period from 2011-2028.
 - The remaining 'saved' policies from the Local Plan 2000, adopted December 2000.
- 1.6 Surrey Heath Borough Council is now in the process of preparing a new Local Plan that will cover the plan period up to 2032. Consultation on the Issues and Options Local Plan Document (Regulation 18) will take place in Spring 2018.
- 1.7 The 2016 Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment (SHMA)¹ identifies that Surrey Heath has an Objectively Assessed Housing Need (OAHN) of 382 units per year across the period of 2014-2032. The adopted Core Strategy currently provides for only 191 units per year and the 2017 Strategic Land Availability Assessment (SLAA), due to be finalised in November 2017, indicates that there are currently insufficient sites to address this additional need, creating an estimated shortfall of 1,483 dwellings, including backlog.
- 1.8 In the development of the new Local Plan, the Council will need to consider whether any alternative spatial strategies can address, or reduce this shortfall. The Council will initially consider whether there are any sites within the countryside beyond the Green Belt capable of meeting the shortfall against the Council's OAHN, and following this may need to give consideration as to whether there are 'exceptional circumstances' to release land from the Green Belt. Further evidence is therefore required to inform the Council's decision making in respect of what sites, if any, to release within the new Local Plan to address the Council's shortfall against its OAHN.

Structure of report

- 1.9 This appraisal report is set out as follows:
- **Chapter 2** explains the assessment methodology used.
 - **Chapter 3** summarises the findings of the environmental constraints assessment.
 - **Chapter 4** summarises the findings of the services assessment.
 - **Chapter 5** discusses the achievability of developing each site for housing.
 - **Chapter 6** presents the assessment conclusions.
- 1.10 The assessment is supported by a number of appendices:
- **Appendix 1** lists the sites assessed.
 - **Appendix 2** lists the data and information sources used in the assessment.
 - **Appendix 3** provides the full assessment results for each site.
 - **Appendix 4** presents the detailed findings of the landscape review.
 - **Appendix 5** presents the detailed findings of the Green Belt assessment.
 - **Appendix 6** presents the maps showing proximity to services.

¹ Wessex Economics (2016) Hart, Rushmoor and Surrey Heath Strategic Housing Market Assessment 2014-2032 for Hart District Council, Rushmoor Borough Council & Surrey Heath Borough Council. Available at: <http://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base/strategic-housing-market-assessment>.

2 Methodology

2.1 This chapter sets out the methodology used for this study, under the following headings:

- Overview of sites assessed.
- Data collation and analysis.
- Assessment of environmental constraints, including:
 - Landscape review; and
 - Green Belt assessment.
- Assessment of proximity to services.
- Assessment of development achievability.





Sites assessed

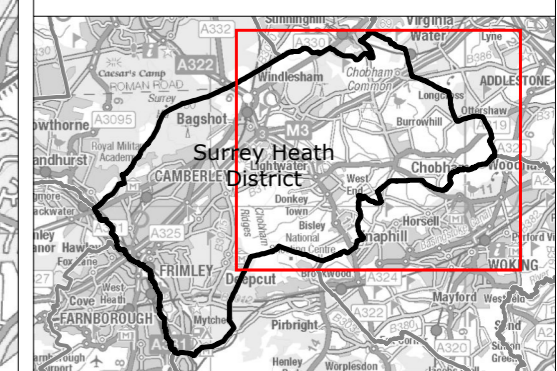
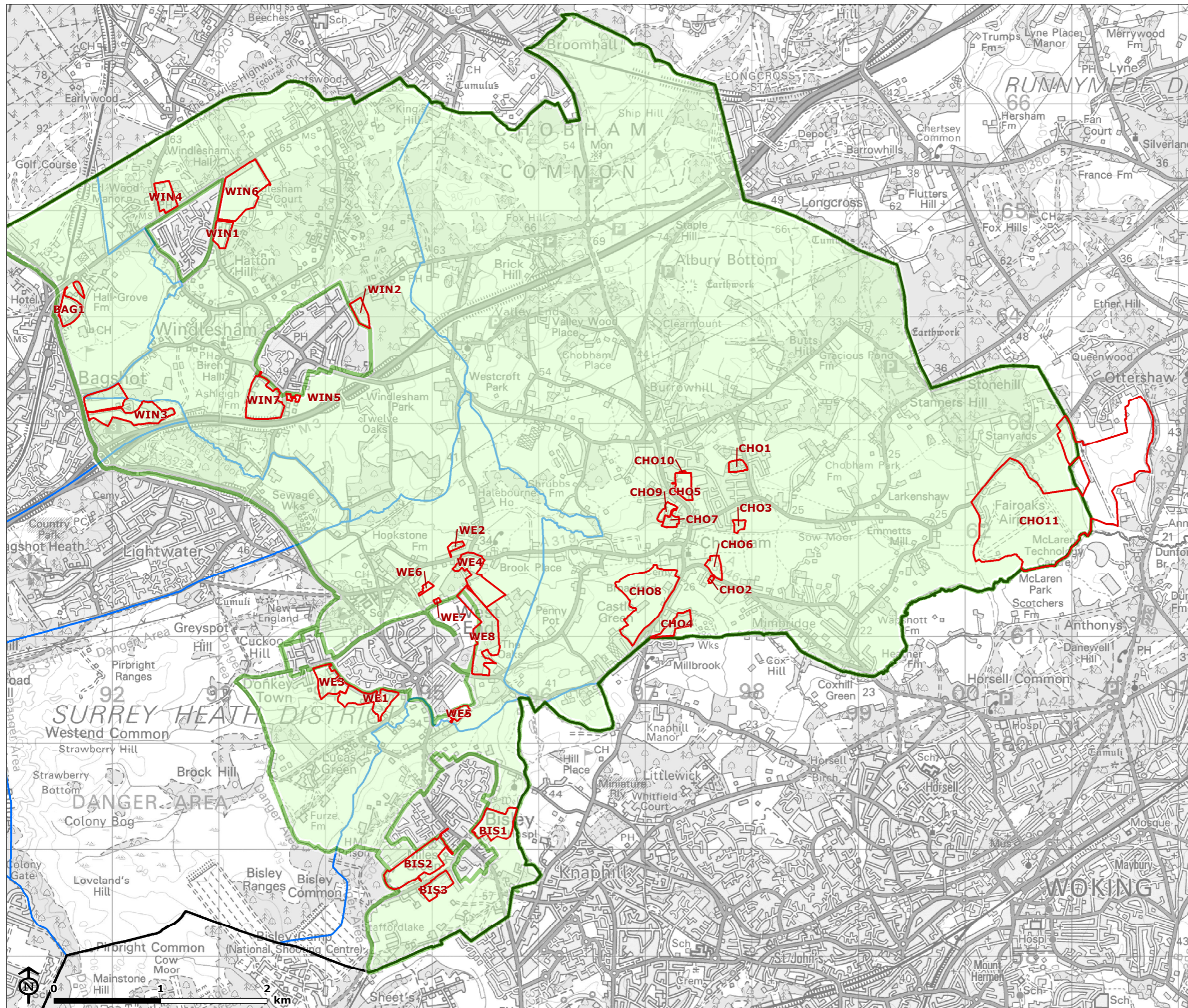
2.2 This study considers sites that may be available for residential development within Surrey Heath Green Belt. There are 30 sites included in the assessment (**Figure 2.1**), most of which have been identified through the Local Plan call for sites process in July 2017 and subsequently incorporated into the 2017 Strategic Land Availability Assessment – SLAA. In addition there is an additional site that has been identified by SHBC as potentially suitable for housing development – Fair Oaks Airport - which has also been assessed. A list of the sites assessed and their size is provided in **Appendix 1**. Throughout this document, the sites are referred to by their SLAA reference number and a geographical reference, which refers to one of the following areas within the Borough:

- Bagshot (BAG reference);
- Bisley (BIS reference);
- Chobham (CHO reference);
- West End (WE reference); and
- Windlesham (WIN reference).

Surrey Heath Borough Council Site Appraisals

Figure 2.1: Sites in the Green Belt

-  Surrey Heath Borough
-  SLAA/ other reference
-  Sub areas
-  Green Belt



Map Scale @A3: 1:35,000



Data collection and analysis

- 2.3 Data on the environmental constraints and services has been collated from sources in the public domain and from data held by SHBC and Surrey County Council. Full details of the data used and how it has been analysed are provided in **Appendix 2**.
- 2.4 The data has been mapped using Geographical Information System (GIS) software and includes the following components:
- **Background mapping and aerial photography.**
 - **Boundaries of assessed sites.**
 - **Physical constraints:** roads, rivers, waterbodies, railways, buildings, oil pipelines² and other major infrastructure, and the Farnborough Airport Public Safety Zone. With the exception of buildings, physical constraints have been excluded from the assessment as development within these areas is not possible. Buildings have been assumed to be potentially developable unless they have known heritage value.
 - **Environmental constraints:** habitats and wildlife sites; heritage assets; landscape, green space and countryside; and soils and water. The criteria used in the assessment of environmental constraints are set out below.
 - **Services:** employment, education, transport, health, retail, and leisure. The proximity of each site to these services has been identified using GIS, and is described below.

Assessment of environmental constraints

- 2.1 For each of the environmental constraints being considered, the constraint has been categorised as either 'absolute' or 'non-absolute', according to the environmental sensitivity of the asset in question and the strength of the policy safeguards that apply to it:
- **Absolute** constraints are those constraints where significant development is likely to be precluded, for example within 400m of the Thames Basin Heaths SPA.
 - **Non-absolute** constraints are those that are sensitive but have less weight applied to them in national policy, i.e. where significant development may not be precluded, but where there is the risk of negative impacts which could be significant, for example at the sub-national or local level.
- 2.2 Absolute constraints, along with physical constraints (as defined above, except buildings), have been mapped in relation to the sites under consideration. The capacity of a site to accommodate housing has then been calculated by identifying the area not constrained by absolute and physical constraints. For each potential housing site, a development density of 30 dwellings per hectare has been applied to identify the number of homes that the site could potentially provide. 30 dph has been used in order to apply a consistent approach across all sites for the assessment.
- 2.3 However, a smaller number of homes may actually be achievable, depending on a site's secondary (non-absolute) environmental constraints, proximity to services, development achievability, potential density of development, as well as the requirement (or otherwise) for on-site Suitable Alternative Natural Greenspace (SANG) provision. Further details on the calculation of the number of homes each site could potentially provide is outlined in **Appendix 3**.
- 2.4 Each non-absolute constraint means that mitigation may be required for a particular type of impact, in order for development to be acceptable at that location. As any individual constraint could prove to be a barrier to development if suitable mitigation is not possible, a site with several non-absolute constraints is not necessarily less suitable for development than a site with one non-absolute constraint. Therefore, rather than rank each site in terms of relative suitability for

² Note that, for the purposes of this draft assessment, oil pipelines have been treated as a non-absolute constraint pending confirmation of the status of the pipeline corridor buffer shown on the GIS data.

housing development (based on the number of environmental constraints), a summary of the constraints present and the measures potentially required to overcome those constraints have been presented for each site.

- 2.5 A scoring system has been used to show the likely impact of developing each site. For each constraint, consideration has been given to whether residential development at that location would result in a positive or negative effect, and whether that effect would be minor, moderate, major, or uncertain as shown in **Table 2.1**.

Table 2.1: Key to scoring against site assessment criteria

Scoring symbol	Key
✓✓✓	Major positive effect
✓✓	Moderate positive effect
✓	Minor positive effect
0	Negligible/neutral effect
✘	Minor negative effect
✘✘	Moderate negative effect
✘✘✘	Major negative effect
?	Uncertain effect

Absolute constraints

- 2.6 **Table 2.2** sets out those features considered to be absolute environmental constraints and the reasons why.

Table 2.2: Absolute environmental constraints

Constraint	Explanation of treatment
Thames Basin Heaths Special Protection Area (SPA) and 400m buffer zone	<p>SPAs are designated under the Habitats Directive³ (transposed into the UK habitats regulations), which protects sites from significant effects on their integrity.</p> <p>The Surrey Heath Thames Basin Heaths SPA SPD⁴ highlights a key threat to the protected species on site, all ground or low level nesting birds, is human activity, particularly recreational activity such as dog walking. Predation by domestic cats is also a risk factor, as well as fly tipping and arson. In 2009, the Thames Basin Heaths Joint Strategic Partnership Board (JSPB) endorsed a strategic Delivery Framework, which recommends a combination of three avoidance measures to protect the Thames Basin Heaths from the impact of new residential development:</p> <ul style="list-style-type: none"> • The establishment of a 400 metre buffer around the SPA within which no net new residential development will be permitted. • The provision of Suitable Alternative Natural Greenspace (SANG). • Strategic Access Management and Monitoring (SAMM) measures, co-ordinated visitor management across the whole of the publically accessible SPA.
Thursley, Ash, Pirbright & Chobham Special Area of Conservation (SAC)	<p>SACs are designated under the Habitats Directive⁵ (transposed into the UK habitats regulations), which protects sites from significant effects on their integrity.</p> <p>The HRA⁶ of the Surrey Heath DPD identifies the following potential impacts on the SAC, which relate to development and increases in local population:</p> <ul style="list-style-type: none"> • Recreational pressure.

³ Also known as the Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora.

⁴ Surrey Heath Borough Council (2012) Local Development framework 2011-2028: Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document (2012) <http://www.surreyheath.gov.uk/residents/planning/planning-policy/supplementary-planning-documents/thames-basin-heaths-special>.

⁵ Also known as the Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora.

⁶ Scott Wilson (2011) Surrey Heath Core Strategy and Development Management Policies: Habitat Regulations Assessment of the Proposed Submission DPD incorporating amendments made post-suspension. For Surrey Heath Borough Council. <http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/LocalPlan/CoreStrat/PrevCoreStrat/FinalHRAwithMaps.pdf>.

Constraint	Explanation of treatment
	<ul style="list-style-type: none"> • Air pollution. • Water abstraction. • Water quality. <p>While the potential for recreational pressure and water quality impacts can be indicated partly by the proximity of proposed development, air pollution and water abstraction relate more to the overall level of development within the Borough and beyond, and are therefore beyond the scope of this study.</p>
Site of Special Scientific Interest (SSSI)	<p>The National Planning Policy Framework (NPPF) states that development on land within or outside a SSSI likely to have an adverse effect on the site, either individually or in combination with other developments, should not normally be permitted⁷.</p> <p>There are two SSSIs within the Green Belt: Chobham Common SSSI and Colony Bog and Bagshot Heath SSSI. Both SSSIs coincide with the Thames Basin Heaths SPA.</p>
National Nature Reserve (NNR)	<p>NNRs are statutorily designated wildlife sites, established under the National Parks and Access to the Countryside Act 1949 and Wildlife and Countryside Act 1981. They are considered to represent some of the most important ecosystems in Britain.</p> <p>Chobham Common NNR largely coincides with the SPA and SAC, although there are two small areas of NNR that lie outside the SPA/SAC boundaries.</p>
Functional floodplains	<p>National Planning Practice Guidance (PPG) states that local authorities should define areas as functional floodplains (Flood Zone 3b) and that these are designated to make space for flood waters during flooding. Development should generally be directed away from functional floodplains using the Environment Agency's catchment flood management plans, shoreline management plans and local flood risk management strategies. If areas are intended to flood they should be safeguarded from development and identified as functional floodplains⁸.</p> <p>Essential infrastructure and water-compatible uses proposed within functional floodplains must pass the Exception Test. PPG⁹ states that such development should be designed and constructed to:</p> <ul style="list-style-type: none"> • remain operational and safe for users in times of flood. • result in no net loss of floodplain storage. • not impede water flows and not increase flood risk elsewhere.

Non-absolute constraints

2.7 **Table 2.3** sets out those features considered to be non-absolute environmental constraints and explains how effects on them have been assessed, with reference to guidance or policy.

Table 2.3: Non-absolute environmental constraints

Constraint	Explanation of treatment
Habitats and wildlife sites	
Thames Basin Heaths SPA 400m to 5km buffer	<p>Surrey Heath Thames Basin Heaths SPA SPD¹⁰ identifies a 400m-5km buffer around the SPA in which developments of dwellings where there is a net gain of one or more homes is considered to give rise to likely significant effects and will be required to contribute towards avoidance measures (SANG and SAMM).</p> <p>Developments of more than 100 dwellings are generally expected to provide on-site SANG. All SANGs, including on-site provision, will be expected as a minimum to provide the standards of 8ha of SANG per 1,000 population.</p> <p>Sites with the capacity to provide greater than 100 homes have been considered to potentially have a major negative effect (not taking into account any effects of</p>

⁷ DCLG (2012) National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

⁸ DCLG (2014) Planning Practice Guidance - Flood Risk and Coastal Change, Paragraph: 015, Reference ID: 7-015-20140306 <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

⁹ DCLG (2014) Planning Practice Guidance - Flood Risk and Coastal Change, Paragraph: 067, Reference ID: 7-067-20140306 <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

¹⁰ Surrey Heath Borough Council (2012) Local Development framework 2011-2028: Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document (2012) <http://www.surreyheath.gov.uk/residents/planning/planning-policy/supplementary-planning-documents/thames-basin-heaths-special>.

Constraint	Explanation of treatment
	mitigation – this is discussed in relation to Achievability), and sites with the capacity for less than 100 have been considered to have a potential moderate negative effect. The whole of Surrey Heath Borough is within 5km of the SPA ¹¹ .
SSSI Impact Risk Zones	Natural England has identified Impact Risk Zones (IRZs) for SSSIs ¹² . These are buffer zones in which certain types of development could have an adverse effect on each site, according to the features it is designated for. Development proposals within those zones must be consulted upon by Natural England, in case there are risks to the SSSIs, and any necessary mitigation identified and agreed. All of the SSSIs within Surrey Heath have IRZs that identify residential development as a potential risk to the sites; the distance at which Natural England need to be consulted depends on the scale of development and the site. Larger sites (e.g. >100 homes) have been considered to have a potentially moderate negative effect and smaller sites a potential minor negative effect.
Local Nature Reserves (LNR)	LNRs are declared by local authorities under the National Parks and Access to the Countryside Act 1949. The adopted Surrey Heath Core Strategy includes policy that restricts development that results in harm to or loss of a LNR ¹³ . Development of a site containing an LNR (i.e. that would be lost) has therefore been considered to cause a moderate negative effect. Sites that are close to a LNR may have a minor negative effect, depending on the potential scale of the development, the nature of the LNR and its sensitivities.
Sites of Nature Conservation Interest (SNCI)	Sites of Nature Conservation Importance (SNCI) are areas that are non-statutorily designated as being of county or local wildlife value ¹⁴ . The adopted Surrey Heath Core Strategy includes policy that restricts development that results in harm to or loss of SNCI ¹⁵ . Total loss of a SNCI would be considered to be a major negative effect. Potential loss of an SNCI would be considered to cause a moderate negative effect. Sites that are close to a SNCI may have a minor negative effect, depending on the potential scale of the development, the nature of the SNCI and its sensitivities.
Ancient woodland	The National Planning Policy Framework (NPPF) states that development resulting in the loss of ancient woodland, areas that have been wooded continuously since at least 1600AD, should be refused, unless the need for, and benefits of, the development in that location clearly outweigh the loss ¹⁶ . Development of a site containing ancient woodland (that would be lost) has therefore been considered to cause a major negative effect.
Priority habitat	Priority habitat has been identified in the UK or regional Biodiversity Action Plans as being of biodiversity importance. Surrey Heath's Core Strategy (policy CP14A) identifies the local importance of priority habitats and states that biodiversity should be protected, managed and enhanced. The loss of priority habitat due to development would therefore be a minor or moderate

¹¹ Surrey Heath Borough Council (2012) Local Development framework 2011-2028: Thames Basin Heaths Special Protection Area Avoidance Strategy Supplementary Planning Document (2012) <http://www.surreyheath.gov.uk/residents/planning/planning-policy/supplementary-planning-documents/thames-basin-heaths-special>.

¹² Natural England, Natural England's Impact Risk Zones for Sites of Special Scientific Interest (For use by Local Planning Authorities to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites and determine when to consult Natural England): User Guidance (2017) http://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf.

¹³ Surrey Heath Borough Council (2012) Core Strategy & Development management Policies 2011-2018: Policy CP14A Biodiversity and Nature Conservation <http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/CSFinalAdoptedCSDMPSmallFileSize.pdf>.

¹⁴ Surrey Heath Borough Council (2012) Core Strategy & Development management Policies 2011-2018 <http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/CSFinalAdoptedCSDMPSmallFileSize.pdf>.

¹⁵ Surrey Heath Borough Council (2012) Core Strategy & Development management Policies 2011-2018: Policy CP14A Biodiversity and Nature Conservation <http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/CSFinalAdoptedCSDMPSmallFileSize.pdf>.

¹⁶ DCLG (2012) National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework-2>.

Constraint	Explanation of treatment
	negative effect, depending on the scale of the loss.
Tree Preservation Orders (TPO)	<p>National Planning Practice Guidance (PPG)¹⁷ states that local planning authorities in England may protect specific trees, groups of trees or woodland in the interests of amenity via a TPO. This Order prohibits the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction or protected trees.</p> <p>A number of trees, tree groups and woodlands are protected by Surrey Heath Borough Council and their damage, destruction or works to such trees requires permission from the Council¹⁸. The loss of trees with TPOs would therefore be a minor or moderate negative effect, depending on the scale of the loss.</p>
Heritage assets	
<p>Designated heritage assets</p> <p>(Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Registered Battlefields, Conservation Areas;</p> <p>Non-designated archaeological assets meeting the criteria for national significance (equivalent to that for Scheduled Monuments))</p>	<p>The NPPF¹⁹ requires that developments be refused planning permission if they will lead to substantial harm to or loss of significance of a designated heritage. Permission should only be granted if the benefits outweigh the harm, or if all of the following apply:</p> <ul style="list-style-type: none"> • the nature of the heritage asset prevents all reasonable uses of the site; and • no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and • conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and • the harm or loss is outweighed by the benefit of bringing the site back into use. <p>Conservation Areas are designated under the Planning (Listed Buildings and Conservation Areas) Act 1990²⁰ by local planning authorities or the Secretary of State for their special architectural or historic interest²¹. Development within Conservation Areas should consider the Conservation Area Appraisals and Management Proposals²², documents produced by Surrey Heath Borough Council outlining the special character of each Conservation Area and the management proposals to preserve and enhance this character.</p> <p>Additionally, non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.</p> <p>For each type of heritage asset, it has been identified whether the feature is present and a historic environment consultant's professional judgement has been used to establish whether there is any potential for setting change. Commentary is provided for each site on the historic environment at the site. The assessment score relates to heritage assets as a whole.</p>
<p>Undesignated heritage assets</p> <p>Local Heritage Assets²³, and other previously-recognised undesignated heritage assets – for example, those identified in the Surrey Historic Environment Record.</p>	<p>The NPPF²⁴ requires that the effects of developments on the significance of non-designated heritage assets be taken into account when determining planning applications. Developments that cause loss to the whole or part of a heritage asset should be refused without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.</p> <p>Surrey Heath's Local Heritage Asset Supplementary Planning Document (SPD) states that development affecting Local Heritage Assets as defined on the Council's Local Heritage Asset List²⁵ will need to consider the relevant policies in the NPPF and the Core Strategy and Development Management Policies DPD²⁶.</p> <p>Undesignated heritage assets have been assessed as for designated heritage assets.</p>

¹⁷ DCLG (2014) Planning Practice Guidance - Tree Preservation Orders and trees in conservation areas, Paragraph: 001 Reference ID: 36-001-20140306 <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas>.

¹⁸ Surrey Heath Borough Council (2017) Tree Information and Preservation Orders <http://www.surreyheath.gov.uk/residents/planning/tree-information-and-preservation-orders>.

¹⁹ DCLG (2012) National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework-2>.

²⁰ Planning (Listed Buildings and Conservation Areas) Act 1990 <https://www.legislation.gov.uk/ukpga/1990/9/contents>.

²¹ Historic England (2017) Conservation Areas <https://historicengland.org.uk/listing/what-is-designation/local/conservation-areas/>.

²² Surrey Heath Borough Council (2017) Conservation Areas <http://www.surreyheath.gov.uk/residents/planning/historic-environment/conservation-areas>.

²³ As identified in the Local Heritage Assets SPD (2012), and set out in the 'List of Historic Buildings in Surrey Heath' (2010)

Constraint	Explanation of treatment
Areas of High Archaeological Potential	<p>Areas of High Archaeological Potential are identified in the Sites and Monuments Record maintained by Surrey County Council²⁷. Within these areas it is likely that any disturbance of the ground would result in significant archaeological finds and therefore developments within these areas are required to undertake a prior assessment of the possible archaeological significance of the site and the implications of the proposed development in order to be permitted²⁸.</p> <p>Areas of High Archaeological Potential have been assessed as for designated heritage assets.</p>
Landscape, green space and countryside	
Open spaces and playing pitches	<p>The NPPF (para. 74) sets out the only circumstances in which an open space can be developed for different uses. It clarifies that existing open space should not be built on unless:</p> <ul style="list-style-type: none"> • an assessment has been undertaken which has clearly shown the open space to be surplus to requirements; or • the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or • the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. <p>Surrey Heath's Open Space Standards Paper²⁹ makes recommendations that high quality and high value open space be protected. It also recommends that open space serving identified catchment gaps of other open space typologies be protected and enhanced.</p> <p>Development of a site that would cause total loss of open space and playing pitches has therefore been considered to cause a moderate negative effect. Partial losses may be minor negative, depending on the scale.</p>
Landscape	<p>The European Landscape Convention recognises the importance of the cultural, ecological, environmental and social value of landscape. The convention provides a platform for landscape to be considered at all stages; planning, protection and management in order to achieve sustainable development.</p> <p>Section 11 of the NPPF states that:</p> <p><i>"The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes(...)"</i>³⁰</p> <p>National Planning Practice Guidance (PPG) on the Natural Environment promotes the preparation of landscape character assessments to achieve the objective for planning to recognise the intrinsic character and beauty of the countryside³¹.</p> <p>Landscape has been considered in terms of valued landscape elements, perceptual qualities, and visual contribution, with a rating of potential effects on each of these three elements, plus an overall landscape sensitivity rating. This is described further below.</p>

²⁴ DCLG (2012) National Planning Policy Framework, Paragraphs 128-140 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

²⁵ Surrey Heath Borough Council (2010) List of Historic Buildings in Surrey Heath <http://www.surreyheath.gov.uk/residents/planning/historic-environment/local-heritage-assets>.

²⁶ Surrey Heath Borough Council (2012) Surrey Heath Borough Council Local Plan 2011-2028: Designation of Local Heritage Assets Supplementary Planning Document <http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/Local-Heritage/LocalHeritageAssetsSPD.pdf>.

²⁷ Surrey Heath Borough Council (2017) Areas of High Archaeological Potential <http://www.surreyheath.gov.uk/residents/planning/historic-environment/areas-high-archaeological-potential>.

²⁸ Surrey Heath Borough Council (2012) Core Strategy & Development Management Policies 2011-2028: Policy DM17 Heritage <http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/CSFinalAdoptedCSDMPSmallFileSize.pdf>.

²⁹ Knight, Kavanagh & Page (2016) Open Space Study Standards Paper, October 2016 for Surrey Heath Borough Council <http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/OpenSpaces/Open%20Space%20Standards%20Paper%202016.pdf>.

³⁰ DCLG (2012) National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

³¹ DCLG (2014) Planning Practice Guidance - Natural Environment, Paragraph: 001 Reference ID: 8-001-20140306 <https://www.gov.uk/guidance/natural-environment>.

Constraint	Explanation of treatment
Green Belt and countryside	<p>Paragraph 80 of the NPPF³² states that the five fundamental purposes of Green Belt are as follows:</p> <ul style="list-style-type: none"> • To check the unrestricted sprawl of large built up areas; • To prevent neighbouring towns merging into one another; • To assist in safeguarding the countryside from encroachment; • To preserve the setting and special character of historic towns; and • To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>In the Green Belt there is a general presumption against inappropriate development, unless 'very special circumstances' can be demonstrated to show that the benefits of the development will outweigh the harm caused to the Green Belt.</p> <p>Once established, Green Belt boundaries should only be altered in 'exceptional circumstances', through the preparation or review of the Local Plan. A site's contribution to the Green Belt purposes has been assessed by checking the site against the emerging Surrey Heath Green Belt and Countryside Study findings.</p> <p>This involved identifying if the contribution to Green Belt for the Site differs to the rating given for the assessment parcels used in the Surrey Heath Green Belt and Countryside Study.</p>
Soils and water	
Contaminated land	Data is not currently available on contaminated land. This has therefore been excluded from the assessment.
Agricultural Land	<p>The NPPF³³ states in paragraph 112 that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.</p> <p>The NPPF defines the 'best and most versatile agriculture land' as land in grades 1, 2 and 3a of the Agricultural Land Classification. Grade 1 land is considered 'Excellent', Grade 2 'Very Good', Grade 3 'Good to Moderate', Grade 4 'Poor' and Grade 5 'Very Poor' agricultural land³⁴.</p> <p>Development that causes the loss of Grade 1 or Grade 2 agricultural land is considered to have a major negative effect. Development that causes the loss of Grade 3 agricultural land (data is not available to distinguish between Grades 3a and 3b) is considered to have a moderate negative effect. Grade 4 and Grade 5 agricultural land has not been considered within the assessment.</p>

³² DCLG (2012) National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework-2>.

³³ DCLG (2012) National Planning Policy Framework <https://www.gov.uk/government/publications/national-planning-policy-framework-2>.

³⁴ Natural England (2010) Agricultural Land Classification map London and the South East (ALC007) <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>.

Constraint	Explanation of treatment
Flood Zone 3a	<p>National Planning Policy Guidance (PPG)³⁵ defines Flood Zone 3a as ‘Land having a 1 in 100 or greater annual probability of river flooding; or Land having a 1 in 200 or greater annual probability of sea flooding’.</p> <p>The PPG considered caravans, mobile homes and park homes intended for permanent residential use as ‘highly vulnerable’ and dwelling houses, as well as other residential developments such as student residences and care homes, as ‘more vulnerable’³⁶. Therefore, the layout of developments should be designed so the most vulnerable uses, such as residential properties, are restricted to higher ground with a lower risk of flooding, with development of lower vulnerability, such as parking and open space in the higher risk areas³⁷.</p> <p>Where it is not possible to locate development in areas of low flood risk (the ‘sequential test’), an Exception Test can be applied. The Exception Test must demonstrate that the benefits of the development outweigh the risk and that a site-specific Flood Risk Assessment demonstrates that the development will be safe and will not increase flood risk elsewhere³⁸.</p> <p>Developments within Flood Zone 3a therefore contribute to major negative effects.</p>
Flood Zone 2	<p>National Planning Policy Guidance (PPG)³⁹ defines Flood Zone 2 as ‘Land having between a 1 in 100 and 1 in 1,000 annual probability of river flooding; or land having between a 1 in 200 and 1 in 1,000 annual probability of sea flooding’.</p> <p>Developments within Flood Zone 2 therefore contribute to moderate negative effects.</p>

2.8 **Chapter 3** summarises the findings of the environmental constraints assessment and **Appendix 3** provides the full assessment results for each site.

Landscape sensitivity assessment

- 2.9 The assessment of landscape characteristics at each potential housing site within the Green Belt has been undertaken using a combination of desk study and site visits.
- 2.10 The desktop assessment has been informed by the Surrey Landscape Character Assessment and an analysis of mapping, aerial views and other online resources. The fieldwork involved visits to all sites and key viewpoints, with photography used to supplement the written assessment.
- 2.11 For both the desk study and site visits, the three characteristics and criteria outlined in **Table 2.4** have been considered.

Table 2.4: Landscape sensitivity assessment methodology

Characteristic	Criteria	Sensitivity
<p>Valued landscape elements</p> <p>Valued landscape elements could be topographical (e.g. a distinctive landform that enhances landscape character), associated with natural land cover (e.g. field</p>	<p>E.g. The landscape makes a strong contribution to local landscape character – e.g. it has a distinctive landform, an intact, natural landscape with hedgerows, trees and other features of interest, such as ponds or watercourses. Strong landform features such as slopes, scarps and valleys are likely to be more sensitive.</p> <p>Many natural features which are key to landscape character are present.</p>	High

³⁵ DCLG (2014) Planning Practice Guidance - Flood Risk and Coastal Change, Paragraph: 065 Reference ID: 7-065-20140306 <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

³⁶ DCLG (2014) Planning Practice Guidance - Flood Risk and Coastal Change, Paragraph: 053 Reference ID: 7-053-20140306 <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

³⁷ DCLG (2014) Planning Practice Guidance - Flood Risk and Coastal Change, Paragraph: 053 Reference ID: 7-053-20140306 <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

³⁸ DCLG (2012) National Planning Policy Framework - Paragraph 102 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>.

³⁹ DCLG (2014) Planning Practice Guidance - Flood Risk and Coastal Change, Paragraph: 065 Reference ID: 7-065-20140306 <https://www.gov.uk/guidance/flood-risk-and-coastal-change>.

Characteristic	Criteria	Sensitivity
pattern or woodland) or associated with the built landscape (e.g. listed buildings). Additional value may be conveyed by designations associated to some degree with landscape interest – e.g. ancient woodland or heathland.	E.g. The landscape has some natural features that contribute to, but are not key to local landscape character, or some characteristic elements of everyday value.	Moderate
	E.g. The landscape is simple, lacking in natural features that contribute to local landscape character.	Low
Perceptual qualities This considers qualities such as rurality (traditional land uses with few modern, human influences), sense of remoteness or tranquillity. High scenic value, perceived naturalness, freedom from human activity/disturbance and 'dark skies' would all add to sensitivity in relation to this criterion.	E.g. A relatively tranquil landscape, lacking strong intrusive elements. A high perceived degree of rurality/ naturalness with few modern human influences. High scenic value.	High
	E.g. A landscape with some sense of rurality, but with some modern elements.	Moderate
	E.g. An area significantly influenced by development/ human activity, where new development would not be out of character.	Low
Visual contribution This considers the visual prominence of the site, reflecting the extent of openness or enclosure in the landscape (due to landform or land cover), and the degree of intervisibility with the surrounding landscape (i.e. the extent to which potential development would be visible). It considers the role the sub-area plays in contributing to valued views, such as scenic views from key recreational routes. It also considers whether the site forms a visually distinctive or important undeveloped skyline.	E.g. The sub-area is prominent in views from the wider landscape (e.g. as a result of openness or landform). The sub-area plays a key role in contributing to valued views. Distinctive or undeveloped skylines with important landmark features are likely to be more sensitive to built development, which may detract from these as features in the landscape.	High
	E.g. Development within the sub-area would potentially be visible to some degree or may be partially screened. The sub-area does not contain important landmark features that form a distinctive or prominent skyline.	Moderate
	E.g. The landscape is enclosed/ visually contained and well screened as a result of landform and/or land cover and is not visually prominent in the landscape.	Low
Overall summary and rating	The three aspects of sensitivity set out above are considered in combination to arrive at an overall land sensitivity judgement. Professional judgement is used to reach this overall judgement. In some cases for example Moderate + Moderate + High may equal a Moderate rating overall. This is because the Moderates may be on the upper or lower side of M (so 3 'upper' M's can equal an MH overall). Mitigation measures may in some instances be suggested, but the sensitivity rating will not reflect these. The overall rating uses a five-point scale of high/ moderate-high / moderate / low-moderate / low. High = high landscape sensitivity to development and vice versa.	

2.12 Each site has been described with reference to each of these three characteristics and rated for each, along with an overall landscape sensitivity rating for each site (high-low). These ratings have been used to identify whether proposed development would have a minor, moderate or major (positive or negative effect) on the landscape as shown in **Table 2.5**.

Table 2.5: Landscape sensitivity ratings and potential impact of development

Landscape sensitivity rating	Corresponding site assessment score
No sensitivity	Neutral effect (0)
Low sensitivity (L)	Minor negative effect (*)
Low to moderate sensitivity (LM) Moderate sensitivity (M) Moderate to high sensitivity (MH)	Moderate negative effect (**)
High sensitivity	Major negative effect (***)

2.13 The detailed findings of the landscape review are provided in **Appendix 4**.

Green Belt assessment

2.14 The Green Belt assessment has been based on a desk study, supplemented by information gathered during visits to each site.

2.15 The desk study has considered each site against the findings of SHBC’s Green Belt and Countryside Study (2017). The purpose of the Green Belt and Countryside Study (2017) was to provide the Council with a thorough and up to date understanding of how the Green Belt and Countryside within Surrey Heath functions against the purposes of the Green Belt as set out in the National Planning Policy Framework. The study divided the Green Belt and Countryside up into 107 discrete parcels for assessment. Each parcel was assessed in terms of its contribution to the five Green Belt purposes as set out in paragraph 80 of the NPPF, as follows:

The purposes of Green Belt

1. To check the unrestricted sprawl of large built-up areas.
2. To prevent neighbouring towns merging into one another.
3. To assist in safeguarding the countryside from encroachment.
4. To preserve the setting and special character of historic towns.
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

2.16 For each potential development site, this study summarises the key findings of the parcel-level Green Belt and Countryside Study Assessment (2017). An assessment has then been undertaken of the extent to which each site can be considered to differ from the Green Belt and Countryside Study in terms of its Green Belt contribution to the NPPF purposes. This was required as the assessment parcels for the Green Belt and Countryside Study are not the same as the site boundaries considered in this study.

2.17 No assessment of the potential overall harm of removing land from the Green Belt has been undertaken and will be completed at a later date by SHBC, in the event that the Authority considers that there may be ‘exceptional circumstances’ to warrant the alteration of Green Belt boundaries. This will consider the implications of removing sites from the Green Belt on the integrity of the wider Green Belt – i.e. whether the loss of Green Belt could have implications for the performance of Green Belt within neighbouring land.

2.18 As the assessment does not consider the harm of removing the potential sites from the Green Belt, the scoring (positive / negative and neutral to major) has not been used in this case. Instead a summary is provided of how the site performs against the NPPF Green Belt purposes. It is not possible to assess the performance of Purpose 5 on a site by site basis.

2.19 The detailed findings of the Green Belt assessment are provided in **Appendix 5**.

Assessment of proximity to services

- 2.20 For those sites or parts of sites not affected by absolute constraints, the accessibility of the site (e.g. by walking, cycling, or by public transport) in terms of proximity to services and facilities has been considered. Accessibility to services provides an indication of the likely sustainability of each site, not only in terms of the potential to minimise car travel, but also social and economic opportunities such as fostering community or encouraging local spending. **Table 2.6** sets out the distances that have been used to assess proximity to each service type. The proximity to the following services were assessed:
- Employment: Town centres, District Centres and Core Employment Areas as defined within the Surrey Heath Core Strategy and Development Management Policies DPD.
 - Retail: Town, district, local and neighbourhood centres as defined within the Surrey Heath Core Strategy and Development Management Policies DPD.
 - Education: Primary schools as defined by Surrey County Council (not including private schools, independent schools and special needs schools).
 - Education: Secondary schools as defined by Surrey County Council (not including private schools, independent schools and special needs schools).
 - Transport: Bus stops as defined by National Public Transport Access Nodes.
 - Transport: Railway stations as defined in Ordnance Survey mapping.
 - Health: Doctors surgeries as defined by Surrey Heath Borough Council.
 - Health: Hospitals as defined by Surrey Heath Borough Council.
 - Leisure: Playing pitches and open space as defined by Surrey Heath Borough Council.
 - Leisure: Indoor sports facilities as defined by Surrey Heath Borough Council.
- 2.21 Proximity to services has been mapped using GIS to show where each of the sites lies in relation to each type of service. Straight-line ('as the crow flies') distances have been used to provide a measure of accessibility, but if a site is partially (due to its size) within proximity to a service, this has been acknowledged and a score has been given based on the proximity of the majority of the site to this service. The findings of the assessment of services are presented in **Chapter 4** with the maps shown in **Appendix 6** and the data used for the assessment listed in **Appendix 2**.
- 2.22 As with the environmental constraints, the scoring system has been used to assess the significance of the effects of developing the site for housing. For example, a site that provides easy access to employment, retail, health centres, schools and public transport systems has been rated as having a major positive effect (✓✓✓).
- 2.23 A lack of some services within close proximity to a site does not preclude development of that site, but could mean that provision for new services will need to be met by a developer in order to make the site sustainable. This could make some sites less attractive or unviable. This may also be the case where there are existing services close to a site but they are close to capacity.
- 2.24 An assessment of the capacity of existing services, the potential costs of service provision and development viability is beyond the scope of this assessment. This study solely comments on the sustainability of each site in terms of accessibility to existing services and identifies where sites may lie beyond an acceptable distance from those services.

Table 2.6 Scoring used in the assessment of proximity to services

Definition	Meets 'desirable' / 'preferred' criteria	Meets 'acceptable' criteria	Meets 'maximum' criteria	Borderline e.g. at 'maximum' distance / part of site within	Exceeds maximum criteria slightly	Exceeds maximum criteria moderately (2x)	Exceeds maximum criteria greatly (3x)	Uncertain	Explanation
Score	iii	ii	i	0	x	xx	xxx	?	
'Doorstep' services: Bus stops	<100m	<200m	<400m	c.400m	>400m	>800m	>1.2 km	e.g. existing service may be lost but there are others nearby.	CIHT guidance from 2015 ⁴⁰ suggests that 400m is maximum distance to bus stops in residential areas, and 200m in town centres.
'Neighbourhood' services: Retail (district / local centres), primary school, railway station, doctors surgery, playing pitches / open space, indoor sports facilities	<200m	<400m	<800m	c.800m	>800m	>1.6km	>2.4 km		The 2015 guidance suggests that a range of neighbourhood facilities are provided within 10 minutes' walking time (c.800m). CIHT guidance from 2000 ⁴¹ provides additional detail and suggests 200m (desirable), 400m (acceptable), 800m (preferred maximum) for town centres.
'Town' services: Employment, secondary school, major hospital (A&E)	<500m	<1km	<2km	c.2km	>2km	>4km	>6km		The 2000 guidance suggests 500m (desirable), 1km (acceptable), 2km (preferred maximum) for commuting / school. Hospitals have been considered to have a similar catchment.

⁴⁰ Planning for Walking, 2015: <http://www.ciht.org.uk/en/document-summary/index.cfm/docid/859203EA-CFA1-4BE7-A136D943E93D4904>

⁴¹ Providing for Journeys on Foot, 2000: <http://www.ciht.org.uk/en/knowledge/publications/index.cfm/providing-for-journeys-on-foot-2000>

Assessment of development achievability

- 2.25 Following consideration of environmental constraints and proximity to services, the achievability of residential development at each site has been considered. The assessment presents:
- An overall summary of the site's characteristics.
 - The types of mitigation required to overcome any (non-absolute) constraints.
 - A high level discussion of the benefits that development of the site could bring in terms of environmental or infrastructure improvements (with reference to work already carried out by SHBC, where it can be applied to specific sites).
 - A summary of further work needed to identify whether the sites' suitability for residential development and the benefits that could be derived from doing so.
- 2.26 The assessment of development achievability is contained in **Chapter 5** of this report.

3 Environmental Constraints

- 3.1 This chapter summarises the findings of the environmental constraints assessment. Full details are provided in the appendices, as follows:
- **Appendix 3:** Provides detailed summaries and maps of the absolute and non-absolute constraints at each site. A summary is also provided of the headline findings of the landscape and Green Belt assessment
 - **Appendix 4:** Sets out the detailed findings of the landscape review for each site.
 - **Appendix 5:** Presents the detailed assessment of the contribution of each site to Green Belt purposes.

Screening out of absolute and physical constraints

- 3.2 The following absolute constraints are present within the Borough's Green Belt:
- European designated sites (SPA and SAC) and the Thames Basin Heaths SPA 400m buffer zone.
 - Nationally designated sites (SSSI and NNR).
 - Functional floodplain (Flood Zone 3b).
- 3.3 Several sites have absolute constraints that affect part of the site. None of the sites are within the SPA/SAC or constrained by the NNR, but three sites lie partly within the SPA 400m buffer zone, and eight sites have functional floodplain within them. This is summarised in **Table 3.1**.

Table 3.1: Summary of sites in the Green Belt with absolute environmental constraints

Site	SPA 400m buffer	Flood Zone 3b
BIS2 Ramsbrooks Farm, West of Guildford Road (SLAA ref 741)	●	
CHO3 Land at Latchetts Mead, Green Lane (SLAA ref 409)		●
CHO7 Mincing Lane Nursery, Mincing Lane (SLAA ref 238)		●
CHO8 Broadford, Castle Grove Road (SLAA ref 548)		●
CHO9 Land northwest of The Grange (SLAA ref 597)		●
CHO11 Fair Oaks Airport (not in SLAA)		●
WE1 Land South of Fenns Lane / Land at Heathermead (SLAA ref 153)	●	●
WE3 Land West of Fenns Lane (SLAA ref 239)	●	
WE5 Kingswood Pallets (SLAA ref 799)		●
WIN3 Land at Swift Lane (SLAA ref 737)		●

- 3.4 Most of the sites are constrained to some degree by physical constraints (buildings, roads, railways, water bodies, or safeguarded transport sites), although buildings are only considered to be a constraint to development for the three sites with heritage buildings present. In the majority of cases, only a small proportion (<10%) of the site is constrained (for example where there is an existing heritage building) and none of the sites have a large proportion of their area constrained by physical constraints.
- 3.5 The site summaries in **Appendix 3** include calculations for each of the site areas and the numbers of homes that they could accommodate, once physical and absolute constraints have been removed. For the sites within the Green Belt, physical constraints have little overall effect on the number of homes that can be accommodated within the site.

Assessment of non-absolute constraints

- 3.6 This section provides a commentary on the degree of constraint posed by each type of environmental asset, within the Green Belt, and then summarises the individual sites that may be significantly affected by these constraints.

Habitats and wildlife sites

- 3.7 Some parts of the Borough fall within the Thames Basin Heath SPA 400m buffer zone, in which no net residential development is permitted and the whole of the remainder of the Borough falls within the 400m to 5km Thames Basin Heaths SPA buffer zone. Residential development within this zone is expected to provide or contribute to Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) measures⁴², to mitigate the potential effects of increased recreational pressure on the SPA. Developments of more than 100 dwellings are generally expected to provide SANG on site. Additionally, the Surrey Heath Borough Council Thames Basin Heaths Special Protection Area Avoidance Strategy SPD requires SANG to be able to provide 2.3-2.5km circular walk in order to be effective.
- 3.8 Although the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD does not set out a minimum size for SANG, the need to accommodate a minimum 2.3 – 2.5km walk will in reality have an impact upon the viable size of a SANG. In the Council's experience, the area of SANG required to comfortably deliver a 2.3km walk in line with the other requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD is around 9ha.
- 3.9 The whole Borough also falls within a SSSI Impact Risk Zone (IRZ) in which residential development is identified as having the potential to affect a nearby SSSI. Development proposals within IRZs must be consulted on by Natural England and any necessary mitigation identified and agreed.
- 3.10 There are two SSSIs within the Green Belt: Chobham Common SSSI and Colony Bog and Bagshot Heath SSSI. Both SSSIs coincide with the Thames Basin Heaths SPA.
- 3.11 The potential effects of any specific development on a SSSI would need to be considered on a case by case basis, but could include effects related to:
- Increased recreational pressure.
 - Changes to land use or management.
 - Requirements for water abstraction or discharge.
 - Accidental damage, for example pollution.

⁴² As set out in the Thames Basin Heaths SPA Avoidance Strategy SPD:
<http://www.surreyheath.gov.uk/sites/default/files/documents/residents/planning/planning-policy/TBH/TBHAdoptedSPD.pdf>

- 3.12 There are five LNRs and 31 SNCIs within the Green Belt area of the Borough. One potential housing site (CHO8 Broadford) has an SNCI within its boundaries and several SNCIs lie adjacent or close to sites; no LNRs are close enough to be affected by potential housing sites. The effect of residential development on SNCIs would need to be considered on a site-specific basis, but could include similar effects to those with the potential to affect SSSIs. Note that this assessment has been based on SNCI data for Surrey Heath only.
- 3.13 Although there are several pockets of ancient woodland within the Green Belt, no potential housing sites contain ancient woodland.
- 3.14 Areas of priority habitat occur across the Borough. Lowland heathland and lowland fens largely coincide with the SPA/SAC sites, although pockets occur elsewhere. The majority of the priority habitat found within the potential housing sites is deciduous woodland.

Heritage assets

- 3.15 There are three Conservation Areas within the Green Belt, however only Chobham Village Conservation Area lies close to any proposed housing sites (the CHO sites); CHO6 Land Flexlands Farm and CHO8 Broadford incorporate part of the Conservation Area. There are no Registered Parks or Gardens within the Green Belt, although Bagshot Park abuts the north-western edge of Surrey Heath's Green Belt boundary (close to the BAG sites).
- 3.16 The two Scheduled Monuments within the Green Belt are some distance from the proposed housing sites and are unlikely to constrain development.
- 3.17 Listed Buildings occur throughout the Green Belt but do not fall within the proposed housing sites. However, there are Listed Buildings close to housing sites and development may have the potential in some instances to have an effect on their setting.
- 3.18 There are a number of Areas of High Archaeological Potential within the Green Belt; in a small number of cases, these overlap or lie close to potential housing sites.
- 3.19 The Historic Environment Record identifies a large number of undesignated heritage assets across the Borough. These vary widely in nature and sensitivity and have been considered in relation to the specific housing sites that could affect them (as set out in **Appendix 3**).

Open space

- 3.20 The Green Belt incorporates a variety of types of open space, including playing pitches, parks, play areas, allotments, cemeteries, and semi natural green space. Some of the playing pitches fall within potential housing sites and therefore have the potential to be lost. (this is considered in further detail in **Chapter 4**).

Soils and water

- 3.21 The areas of flood risk within the Green Belt follow corridors from Bagshot towards Chobham and Fair Oaks, and from Chobham southeast towards West End and South towards Woking. Some of the potential housing sites lie within areas of Flood Risk 2 or 3a and significant parts of CHO8 Broadford, Castle Grove Road lie within areas of Flood Risk 3b, which would therefore influence the layout and design of development within the sites.
- 3.22 Although there are no areas of Grade 1 or 2 agricultural land within the Green Belt, there are areas of Grade 3 land. Several potential housing sites are wholly within Grade 3 land and several others are partly within it. At this stage, due to no data being available, it is not possible to identify which of those areas of Grade 3 land are classified as Grade 3a 'best and most versatile' or Grade 3b land. Detailed site surveys would be required to make this distinction.

Landscape review

- 3.23 Around Bagshot, Windlesham and West End, woodlands and well-treed hedgerow boundaries are commonplace in the assessment sites, as they are across the Borough as a whole. Woodland is a characteristic and valued landscape element in Surrey Heath, but the landscape value of specific woodland areas can vary with their visual context, accessibility and character.

- 3.24 Factors such as a strong role in a settlement's setting, or public access, increase the sensitivity of some wooded areas. Sites with lower landscape sensitivity are typically those that have a stronger relationship with urban edges, or other intrusive landscape elements such as major roads, but tree cover can result in moderate perceptual qualities even in relative close proximity to such features.
- 3.25 In Chobham, historic landscape character and good public access increase sensitivity for a number of sites, particularly those associated with Chobham Meadows and woodland to the west of the village, but several smaller sites are contained by existing development, or are already to an extent developed.

Green Belt assessment

- 3.26 The Green Belt assessment assessed the sites against the four NPPF Green Belt purposes. The Green Belt in Surrey Heath does not extend as far west as Camberley and Frimley, or the county boundary at Farnborough/Aldershot. There are also no sites adjacent to Woking or Aldershot. These are the only settlements considered to constitute large built-up areas, so no Green Belt land in the Borough contributes to Green Belt Purpose 1: the prevention of sprawl of large built-up areas.
- 3.27 With regard to Purpose 2, the prevention of coalescence, tree cover in the vicinity of transport routes often help to strengthen the relatively small gaps between settlements. A location alongside a direct route linking settlements, or within a fragile gap that has already been weakened by development, was generally found to make a stronger contribution.
- 3.28 The majority of sites rate highly in terms of preventing countryside encroachment, the third of the purposes of Green Belt. The extent of woodland / strong tree cover in around sites is a common reason for this. The few sites that make a more moderate contribution typically do so because of some urbanising influence within or adjacent, and an absence of strong boundary features to disconnect them from the urban edge. Only sites that are heavily developed, or disconnected from the wide Green Belt by urban development, are considered to make no contribution to this purpose.
- 3.29 Purpose 4 relates to preserving the setting and special character of historic towns. Chobham and Bagshot were the two settlements considered with respect to Purpose 4 to be historic towns. In practice few sites were considered to have sufficient relationship with Bagshot to make any contribution to this purpose, but a number of sites around Chobham were found to contribute to protecting the village's historic character.

Summary

- 3.30 **Table 3.2** summarises the assessment of environmental constraints detailed in **Appendix 3**. Note that these initial scores assess each constraint individually and are based on the presence of environmental assets within each site. They do not take into account the opportunities for mitigation, or the combined effect of the sites' constraints; these are discussed in **Chapter 5 Achievability**.
- 3.31 Four sites (BIS2, CHO8, WE1 and WE3) have a large proportion of their areas constrained by absolute or physical constraints (the Thames Basin Heath SPA 400m buffer or flooding). However, in the cases of BIS2 and CHO8, the sites are large enough that a significant number of homes can be accommodated despite these constraints.

- 3.32 Some parts of the Borough fall within the Thames Basin Heath SPA 400m buffer zone, in which no net residential development is permitted and the whole of the remainder of the Borough falls within the 400m to 5km Thames Basin Heaths SPA buffer zone, as well as within SSSI Impact Risk Zones. Development at all sites therefore scores negatively in relation to these constraints. The difference in scores is due to the scale of development that can be accommodated at each site. Just over half of the sites can accommodate greater than 100 homes and therefore receive a major negative score in relation to the SPA buffer (not taking into account the potential for mitigation) and a moderate negative score in relation to the SSSIs.
- 3.33 Most of the sites have a moderate negative impact in terms of landscape, although CHO3, CHO8 and WE4 have high sensitivity and therefore housing development at these sites has the potential to have major negative impacts. The performance of the sites against Green Belt purposes varies according to their location and scale. Other differences between the sites, in terms of their scores, arise from the relative presence of priority habitats, agricultural land, heritage assets, and areas of flood risk. There are no major constraints associated with SNCIs, priority habitats, TPOs, or open space. None of the sites are constrained by LNRs or ancient woodland. Only one of the sites has an SNCI within its boundaries: CHO8 Broadford has part of Broadford Meadows within it.
- 3.34 With regards to the historic environment, with the exception of Fair Oaks Airport, which is a heritage asset in its own right (due to its military heritage) and has a large area at risk of flooding, heritage constraints are likely to result in minor or moderate impacts. These would require mitigation and/or influence the layout or number of homes possible at the sites, but would not necessarily preclude development. In some cases, however, it has not been possible to determine the sensitivity of heritage assets through this desk study and additional site-level investigation would be required.
- 3.35 One third of the sites are constrained by flood risk that could pose a major constraint to the capacity to accommodate homes, site layout and/or development viability. A similar number of sites are affected by the presence of agricultural land; six sites are almost entirely or wholly on Grade 3 agricultural land.
- 3.36 Overall, Fair Oaks Airport appears to be the most environmentally constrained, but it may potentially still be able to accommodate a large number of homes, owing to the size of the site. Seventeen sites (BAG1, BIS1, BIS3, CHO1, CHO4, CHO5, CHO10, WE2, WE3, WE6, WE7, WIN1, WIN2, WIN4, WIN5 and WIN7) have no major negative scores, but can accommodate a smaller number of homes; half of which can accommodate 96-99 homes. CHO1 Mincing Lane (48 homes), WE3 Land West of Fenns Lane (78 homes), and WIN2 Land North of Reserve Site, Heathpark Drive (83 homes) can accommodate a moderate number of homes. CHO10 Peerless Site, Windsor Court Road (3 homes), WE2 Conifers Nursery, Bagshot Road (21 homes), WE6 Land at 34 Streets Heath, West End (21 homes), WE7 Land at Fairfield Lane (6 homes) and WIN5 Land off Broadway Road, Windlesham (18 homes) can accommodate a small number of homes.

Key

Scoring symbol	Key
0	Negligible/neutral effect
x	Minor negative effect
xx	Moderate negative effect
xxx	Major negative effect
••	Significant physical / absolute constraints
•	Physical / absolute constraints are present
?	Uncertain effect

Scoring symbol	Key
N	No contribution to Green Belt purpose
W	Weak contribution to Green Belt purpose
M	Moderate contribution to Green Belt purpose
S	Strong contribution to Green Belt purpose
S/M	Parts of the site score differently

Table 3.2: Summary of constraints at Green Belt sites

Site ref: LUC (SLAA)	Site name	Phys/absolute constraint	TBH 400m-5km buffer	SSSI IRZ	SNCI	LNR	Ancient woodland	Priority habitat	TPO	Heritage	Open spaces/pitches	Agricultural land	Flood Zone	Landscape	Green Belt Purpose 1	Green Belt Purpose 2	Green Belt Purpose 3	Green Belt Purpose 4
BAG1 (736)	Grove End		xx	x	0	0	0	0	0	x	0	0	0	xx	N	M	M	N
BIS1 (740)	Land East of Clews Lane		xx	x	0	0	0	0	0	xx	0	0	0	xx	N	S	S	N
BIS2 (741)	Ramsbrooks Farm, Land West of Guildford Road	●●	xxx	xx	x	0	0	0	x	0	0	0	0	xx	N	W	M	N
BIS3 (800)	The Miles Green Nursery		xx	x	0	0	0	0	0	x	x	0	0	xx	N	M	M	N
CHO1 (238)	Mincing Lane Nursery, Mincing Lane		xx	x	0	0	0	xx	x	x	0	0	0	xx	N	W	S	N
CHO2 (316)	Leonard Daborn Ltd, Station Road		xx	x	0	0	0	0	0	?	0	xx	xxx	x	N	N	N	N
CHO3 (409)	Land at Latchetts Mead, Green Lane	●	xx	x	0	0	0	xx	0	?	0	0	xxx	xxx	N	W	M	N
CHO4 (414)	Land north of Lakeside Drive, Chobham		xx	x	0	0	0	xx	0	x	0	0	0	xx	N	M	S	W
CHO5 (447)	Chobham Rugby Club, Windsor Road		xx	x	0	0	0	0	0	x	xx	0	0	x	N	N	N	N
CHO6 (510)	Land at Flexlands Farm, Station Road		xx	x	0	0	0	0	0	?	0	xx	xxx	xx	N	M	S	S
CHO7 (546)	Land rear of The Grange	●	xx	x	0	0	0	xx	xx	x	0	0	xxx	xx	N	M	S	S

Site ref: LUC (SLAA)	Site name	Phys/absolute constraint	TBH 400m-5km buffer	SSSI IRZ	SNCI	LNR	Ancient woodland	Priority habitat	TPO	Heritage	Open spaces/pitches	Agricultural land	Flood Zone	Landscape	Green Belt Purpose 1	Green Belt Purpose 2	Green Belt Purpose 3	Green Belt Purpose 4
CHO8 (548)	Broadford, Castle Grove Road	●●	xxx	xx	xx	0	0	x	0	?	0	xx	xxx	xxx	N	S	S	S
CHO9 (597)	Land northwest of The Grange	●	xx	x	0	0	0	x	xx	x	0	0	xxx	xx	N	W	S	S
CHO10 (755)	Peerless Site, Windsor Court Road	●	xx	x	0	0	0	0	0	0	0	0	0	x	N	N	N	N
CHO11 (n/a)	Fairoaks Airport	●	xxx	xx	0	0	0	x	0	xxx	0	0	xxx	xx	N	W/M/S	M/S	N
WE1 (153)	Land South of Fenns Lane/Land at Heathermead	●●	xx	x	0	0	0	x	0	xx	0	0	xxx	xx	N	S/M	S	N
WE2 (233)	Conifers Nursery, Bagshot Road	●	xx	x	0	0	0	0	0	0	0	xx	xx	x	N	W	M	N
WE3 (239)	Land west of Fenns Lane	●●	xx	x	0	0	0	0	0	0	0	0	xx	xx	N	M	S	N
WE4 (374)	Land at Pankhurst Farm	●	xx	x	0	0	0	x	0	x	0	xx	0	xxx	N	S	S	N
WE5 (799)	Kingswood Pallets	●	xx	x	0	0	0	x	0	0	0	0	xxx	xx	N	S	M	N
WE6 (805)	Land at 34 Streets Heath, West End		xx	x	0	0	0	0	0	0	0	xx	0	xx	N	W	S	N
WE7 (806)	Land at Fairfield Lane		xx	x	0	0	0	0	0	x	0	xx	0	xx	N	W	S	N
WE8 (813)	Land at Oak Farm House	●	xxx	xx	0	0	0	xx	0	xx	0	xx	0	xx	N	M	S	N

Site ref: LUC (SLAA)	Site name	Phys/absolute constraint	TBH 400m-5km buffer	SSSI IRZ	SNCI	LNR	Ancient woodland	Priority habitat	TPO	Heritage	Open spaces/pitches	Agricultural land	Flood Zone	Landscape	Green Belt Purpose 1	Green Belt Purpose 2	Green Belt Purpose 3	Green Belt Purpose 4
WIN1 (276)	Land East of Snows Ride/Hatton Hill		xx	xx	0	0	0	0	x	?	0	0	0	xx	N	S	M	N
WIN2 (609)	Land north Reserve Site, Heathpark Drive		xx	x	0	0	0	x	x	0	0	0	0	xx	N	W	S	N
WIN3 (737)	Land at Swift Lane	●	xxx	xx	0	0	0	xx	0	x	0	0	xxx	xx	N	M/S	S	N
WIN4 (807)	Land east of Sunninghill Road, Windlesham		xx	x	0	0	0	x	0	0	0	0	0	xx	N	M	S	N
WIN5 (808)	Land off Broadway Road, Windlesham		xx	x	0	0	0	0	0	0	0	xx	0	xx	N	W	W	N
WIN6 (809)	Land East of Snows Ride, Windlesham	●	xxx	xx	0	0	0	x	x	0	0	0	0	xx	N	S	M	N
WIN7 (810)	Land South of Church Road		xx	x	0	0	0	0	0	x	0	xx	0	xx	N	M	S	N

4 Proximity to Services

- 4.1 This chapter provides an assessment of how well the sites are served by services and facilities, and in particular those sites that are not constrained by physical or absolute constraints. **Table 4.1** summarises the proximity of the sites to employment, retail, education, transport, health and leisure services. Detailed assessments and maps are included in **Appendix 3 and Appendix 6**.
- 4.2 The proximity of potential housing sites to services contributes to the attractiveness of the location as a place to live, influences how people travel, and may affect viability if developers need to contribute to off-site infrastructure improvements or provide facilities on site.
- 4.3 Fair Oaks Airport (CHO11) is located the furthest from existing settlements and scores poorly in terms of proximity to all existing services. However, as the largest potential housing site under consideration, development would need to support the required provision of new services, subject to viability. This is discussed further in **Chapter 5**.
- 4.4 Only two sites (BAG1 and WIN3) have good access to the employment opportunities that town centres provide, whilst two thirds of sites have good access to shopping areas. The sites closest to Bagshot and Woking, located in the adjacent authority, are the best located for employment, whilst the sites in Bisley and Chobham, and some of those in West End, are the best located for shops.
- 4.5 The majority of the sites either have good access to a primary school, or good access to a secondary school. One site in Chobham (CHO1) and two in Windlesham (CHO1, WIN2 & 7) are wholly beyond the recommended maximum distance for both, but most of the West End sites have good access to both. Although there are fewer secondary schools within the Borough, they are larger than primary schools and it is generally accepted that students will travel further to a secondary school than a primary school. Secondary students may be more likely to travel by bus or bicycle; therefore if it is easy to access secondary schools by these means, and their distance may be less of a constraint than appears.
- 4.6 Most of the sites are within an acceptable distance from a bus stop. For the purposes of the study a frequent bus service is considered to be two or more bus services an hour. Therefore the areas of Chobham and Windlesham are considered to have infrequent bus services as they do not meet this criterion. Only the site in Bagshot (BAG1) is within an acceptable distance to a railway station. 20 of the sites are greater than 2.4km from a railway station and therefore have a major negative score. As with secondary schools, if it is easy to access the railway stations despite their distance (for example by bus or bicycle), distance from railway stations may pose less of a constraint than the initial assessment indicates.
- 4.7 There are no sites that are close enough to a hospital to score positively in terms of access, and only one third of the sites score positively in terms of access to GP surgeries. As with railway stations and secondary schools, good access by bus or other means, may reduce the effects of distance from potential housing sites. However, access to hospitals has less of an influence on the sustainability or viability of a development site, as people generally make fewer trips to hospitals than other services. The distance from GP surgeries, particularly if they have limited capacity, could influence the viability of developments.
- 4.8 Most of the sites have good access to indoor and outdoor leisure facilities, although development at one of the sites (CHO5) would involve the loss of existing playing pitches.
- 4.9 In summary, Fair Oaks Airport scores the lowest in terms of existing service provision. None of the sites stand out as being significantly better in terms of service provision, but the sites around Chobham appear to score slightly higher as a group than other locations. All of the sites, with the exception of Fair Oaks Airport (which could provide significant services on site), have a mixture of positives and negatives in terms of access to existing services.

Key

Scoring symbol	Key
✓✓✓	Meets 'desirable' / 'preferred' criteria
✓✓	Meets 'acceptable' criteria
✓	Meets 'maximum' criteria
0	Borderline e.g. at 'maximum' distance / part of site within
x	Exceeds maximum criteria slightly
xx	Exceeds maximum criteria moderately (2x)
xxx	Exceeds maximum criteria greatly (3x)
?	Uncertain e.g. existing facility may be lost but others are nearby

Table 4.1: The proximity of Green Belt sites to services

Site ref: LUC (SLAA)	Site name	Employment	Retail	Primary schools	Secondary schools	Bus stops	Railway stations	Doctors surgeries	Hospitals	Playing pitches and open space	Indoor sports facilities
BAG1 (736)	Grove End	✓✓	x	x	✓	0	✓	x	xx	✓✓	✓✓
BIS1 (740)	Land East of Clews Lane	xx	✓	✓	x	0	xx	x	xxx	✓✓	✓
BIS2 (741)	Ramsbrooks Farm, Land West of Guildford Road	xx	✓	✓	x	✓	xx	x	xxx	✓✓✓	✓
BIS3 (800)	The Miles Green Nursery	xx	0	✓	x	x	xx	x	xxx	✓✓✓	✓
CHO1 (238)	Mincing Lane Nursery, Mincing Lane	xx	✓	x	x	✓	xxx	✓	xx	✓✓✓	✓
CHO2 (316)	Leonard Daborn Ltd, Station Road	x	✓✓	✓	x	✓	xxx	✓	xx	✓✓✓	✓✓✓
CHO3 (409)	Land at Latchetts Mead, Green Lane	x	✓✓	✓	x	✓	xxx	✓	xx	✓✓✓	✓
CHO4 (414)	Land north of Lakeside Drive, Chobham	x	✓	✓	x	✓	xxx	x	xxx	✓✓	✓
CHO5 (447)	Chobham Rugby Club, Windsor Road	xx	✓	✓	x	✓✓	xxx	✓✓	xx	?	?
CHO6 (510)	Land at Flexlands Farm, Station Road	x	✓✓	✓	x	✓	xxx	✓	xx	✓✓✓	✓✓
CHO7 (546)	Land rear of The Grange	xx	✓✓	✓✓	x	✓	xxx	✓✓✓	xx	✓✓	✓✓
CHO8 (548)	Broadford, Castle Grove Road	x	✓	✓	x	✓	xxx	x	xxx	✓	✓
CHO9 (597)	Land northwest of The Grange	xx	✓✓	✓✓	x	✓	xxx	✓✓	xx	✓✓	✓✓
CHO10 (755)	Peerless Site, Windsor Court Road	xx	✓	✓	x	✓✓✓	xxx	✓	xx	✓✓✓	✓✓✓
CHO11 (n/a)	Fairoaks Airport	x	xxx	xxx	x	xx	xxx	xx	x	0	xx

Site ref: LUC (SLAA)	Site name	Employment	Retail	Primary schools	Secondary schools	Bus stops	Railway stations	Doctors surgeries	Hospitals	Playing pitches and open space	Indoor sports facilities
WE1 (153)	Land South of Fenns Lane/Land at Heathermead	xx	✓	x	✓✓	x	xxx	✓	xxx	✓✓	✓
WE2 (233)	Conifers Nursery, Bagshot Road	xx	x	✓	✓✓	✓	xxx	x	xxx	✓	✓
WE3 (239)	Land west of Fenns Lane	xx	✓	x	✓✓	x	xxx	✓	xxx	✓✓	x
WE4 (374)	Land at Pankhurst Farm	xx	x	✓	✓	✓	xxx	x	xxx	✓	✓
WE5 (799)	Kingswood Pallets	xx	✓	0	✓	✓	xxx	✓	xxx	✓✓	✓✓
WE6 (805)	Land at 34 Streets Heath, West End	xx	✓	✓	✓✓	x	xxx	x	xxx	✓✓✓	✓✓
WE7 (806)	Land at Fairfield Lane	xx	✓	✓✓	✓✓	✓	xxx	x	xxx	✓✓✓	✓✓
WE8 (813)	Land at Oak Farm House	xx	✓	✓✓	✓	✓	xxx	x	xxx	✓	✓
WIN1 (276)	Land East of Snows Ride/Hatton Hill	x	x	✓	x	✓✓	xx	xxx	xx	✓	✓
WIN2 (609)	Land north Reserve Site, Heathpark Drive	x	✓	x	x	✓✓	xxx	xx	xx	✓✓	✓
WIN3 (737)	Land at Swift Lane	✓✓	x	✓	x	✓	0	x	xx	✓	✓
WIN4 (807)	Land east of Sunninghill Road, Windlesham	x	xx	✓	x	✓	xx	xx	x	0	0
WIN5 (808)	Land off Broadway Road, Windlesham	x	✓	x	0	✓✓	xx	x	xx	✓	✓
WIN6 (809)	Land East of Snows Ride, Windlesham	x	x	0	✓	✓	xx	xxx	x	x	x
WIN7 (810)	Land South of Church Road	x	✓	x	x	✓	xx	x	xx	✓	0

5 Achievability

- 5.1 This chapter considers how achievable residential development would be at each site, taking into account the findings from the analysis of: the physical, absolute and non-absolute constraints; the proximity to services and facilities; and the types of measures that would be required to overcome any identified issues.

Factors affecting development achievability

- 5.2 The achievability of residential development at any specific site depends on:
- the availability of the land, for example how willing the landowner is to sell or develop;
 - the likelihood of obtaining planning permission, which is related to the sustainability of the proposals and the degree to which any harm can be mitigated;
 - the financial viability of the development, which is influenced by factors such as the requirement for new infrastructure; and
 - whether the removal of the site from the Green Belt can be justified in terms of the 'exceptional circumstances' that need to be demonstrated.
- 5.3 The NPPF is predicated on the requirement for evidence that is based on realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period. Para 47 (third bullet) of the NPPF states that Local Plans need to identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. 'Developable' is defined in the footnotes of the NPPF as follows:
- "To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged."*
- 5.4 The NPPG also states with respect to Strategic Land Availability Assessments (SLAAs) that:
- "A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Because persons do not need to have an interest in the land to make planning applications, the existence of a planning permission does not necessarily mean that the site is available. Where potential problems have been identified, then an assessment will need to be made as to how and when they can realistically be overcome. Consideration should also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions."*
- 5.5 This would indicate that there should be explicit landowner interest in bringing forward a site, and no insurmountable environmental/ sustainability constraints.
- 5.6 The majority of the sites considered in this assessment have been put forward as part of SHBC's call for sites process; however, the willingness of individual landowners to develop the sites will vary. For the purposes of this assessment, all of the sites have been considered to have the potential for development.

- 5.7 The viability of a development depends on the return that the developer is likely to receive, which is influenced by the number of homes that can be sold, and the costs incurred. The costs of development include:
- The cost of acquiring the land: this is site-specific.
 - Design and planning application costs; for example, a development that requires an Environmental Impact Assessment is likely to cost more: these are specific to the proposed development.
 - The cost of environmental mitigation: this depends on the sensitivity of the site and what is proposed there.
 - Developer contributions and the cost of new infrastructure: these depend on the scale of development and the capacity of existing infrastructure.
- 5.8 SHBC's *Infrastructure Delivery Plan 2013-2023*⁴³ (February 2013) identifies the Borough's infrastructure requirements and the strategy for providing these is set out in the *Infrastructure Delivery Supplementary Planning Document*⁴⁴ (June 2014). The mechanism by which developers contribute to this is set out in the *CIL Charging Schedule*⁴⁵.
- 5.9 The Delivery Plan notes that new development is expected to put pressure on education provision (particularly primary schools), traffic congestion, the provision of leisure and amenity facilities, and waste and recycling services. As a result, improved infrastructure provision has been planned including improvements to roads, footpaths and cycle routes; additional school places; and improved open space and green infrastructure provision. The focus of infrastructure improvements has largely been in the areas of largest planned growth, around Camberley and Deepcut. The improvements to infrastructure set out in the SHBC documents were expected to take place over a period from 2013 to 2026. It is therefore difficult to identify the current capacity and, depending on when the sites considered in this assessment could be developed, any future capacity issues.
- 5.10 SHBC expects any residential development to make developer contributions, which are largely collected through the Community Infrastructure Levy (CIL).
- 5.11 Further detailed work on infrastructure capacity and viability would be required at the site level to determine whether either would be a barrier to development at specific sites.
- 5.12 If minded to release sites from the Green Belt, the Council will need to demonstrate that there are 'exceptional circumstances' to justify their release. The Housing White Paper (2017), although not currently part of national planning policy, sets out the key tests local authorities should follow in order to justify the 'exceptional circumstances' needed for the release of Green Belt land. Local planning authorities must demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:
- Making effective use of suitable brownfield sites and the opportunities offered by estate regeneration;
 - Making use of the potential offered by land which is currently underused, including surplus public sector land where appropriate;
 - Optimising the proposed density of development; and
 - Exploring whether other authorities can help to meet some of the identified development requirement.
- 5.13 Only once these options have been exhausted can justification potentially be provided for the release of land within the Green Belt. The relative sustainability of each of the sites has been discussed in **Chapters 3 & 4**.

⁴³ Surrey Heath Borough Council (2013) Surrey Heath Borough Council Local Plan 2011-2028: Infrastructure Delivery Plan 2013-2023 <http://www.surreyheath.gov.uk/residents/planning/planning-policy/evidence-base>.

⁴⁴ Surrey Heath Borough Council (2014) Infrastructure Delivery Supplementary Planning Document <http://www.surreyheath.gov.uk/residents/planning/planning-policy/supplementary-planning-documents>.

⁴⁵ Surrey Heath Borough Council (2014) Surrey Heath Borough Council Local Plan 2011-2028: Community Infrastructure Levy (CIL) Charging Schedule <http://www.surreyheath.gov.uk/residents/planning/planning-policy/other-planning-documents/community-infrastructure-levy-cil>.

- 5.14 The following section provides a summary of:
- **The maximum number of homes that could be accommodated on each site based on a capacity of 30dph.** This figure takes into account the physical and absolute constraints affecting the site and any requirements to provide on-site SANG. As previously noted developments of more than 100 dwellings are generally expected to provide on-site SANG. All SANGs, are also expected as a minimum to provide the standards of 8ha of SANG per 1,000 population and should include a 2.3-2.5km circular walk in order to be effective, In the Council's experience, the area of SANG required to comfortably deliver a 2.3km walk in line with the other requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD is around 9ha. Where a site cannot accommodate a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD , it has been assumed that a maximum of 99 or less homes can be accommodated.
 - **Site positives:** i.e. factors in favour of the site.
 - **Potential issues and mitigation measures** that may be required to overcome them.
- 5.15 Further detail on the identified constraints affecting each site and the calculation of the number of homes each site could potentially provide is provided in **Appendix 3**.

Achievability of residential development at each site

BAG1 (736) Grove End

- 5.16 **Maximum number of homes at 30dph:** 99.
- 5.17 **Site positives:** The site has no physical constraints, is well-located for some local services (employment, secondary schools, railway stations, outdoor and indoor leisure facilities), and is unconstrained by LNRs, ancient woodland, priority habitat, TPOs, open spaces, agricultural land or flood risk.
- 5.18 **Potential issues and measures to overcome them:** The area of the site unconstrained by physical and absolute constraints could deliver 150 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. It is very unlikely that the site will be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD, in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that can be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.
- 5.19 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Broadmoor to Bagshot Woods SSSI (c.900m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby – the nearest is Freemantle Field SNCI (c.500m away), that could be affected by development, for example by recreation pressure.
- 5.20 A Grade II listed building, Hall Grove School, is adjacent to the site but generally well screened by vegetation. Trees around the perimeter of the site should therefore be retained to protect the setting of the building.
- 5.21 The site is considered to be of low to moderate landscape sensitivity to housing development as its landscape elements have no particular value, but its visual openness combined with screening tree cover provide a relationship with the surrounding countryside and a degree of screening from traffic. In Green Belt terms, although the site is enclosed by transport links, it retains strong separation from urban development and performs an important role in preserving separation between Bagshot and Windlesham. The site was assessed to perform moderately in relation to NPPF Green Belt Purposes 2 and 3 and make no contribution Purposes 1 and 4.

- 5.22 The site exceeds the maximum recommended distance to a primary school and hospital, and the majority of the site exceeds the recommended distance to a shopping area and a GP surgery. Part of the site also exceeds the recommended distance to a bus stop.

BIS1 (740) Land East of Clews Lane

- 5.23 **Maximum number of homes at 30dph:** 99.
- 5.24 **Site positives:** The site is not affected by any physical or absolute constraints, or by constraints related to local wildlife sites, on-site habitats, open spaces, agricultural land or flood risk. It is well-located in terms of shopping areas, primary schools, outdoor and indoor leisure facilities.
- 5.25 **Potential issues and measures to overcome them:** The area of the site unconstrained by physical and absolute constraints could deliver 246 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. It is very unlikely that the site will be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that can be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.
- 5.26 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.600m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that could be affected by development, for example if they are sensitive to recreation pressure. The nearest is Bisley Common SNCI (c.200m away).
- 5.27 There are potential effects on heritage assets that require further investigation to identify what mitigation may be required. There is a Roman Road which passes through the site and there are buildings of heritage interest adjacent to the site whose setting may have the potential to be affected by development. These include Clews Farmhouse (Listed Building, Grade II*); Clews Farm Barn (Listed Building, Grade II); Holy Well of St. John the Baptist (Listed Building, Grade II). They are all of high importance and lie within 100m of site boundary. In order to mitigate the potential for impacts to the Farmhouse (which is c.60m from the site), the retention / enhancement of existing trees should be prioritised.
- 5.28 The site has moderate to high landscape sensitivity to housing development. The parcel's landform, land cover and field pattern, and its role as a distinct setting to the settlement edge of Bisley, make it sensitive to development.
- 5.29 In terms of Green Belt purposes, although there is settlement abutting the site on two sides, the site's land cover and landform create a relatively strong distinction between settlement and countryside. The site does therefore still retain the characteristics of the countryside. The site was assessed to perform strongly in relation to Purposes 2 and 3 and make no contribution Purposes 1 and 4.
- 5.30 The site exceeds the maximum recommended distance greatly to a hospital, moderately exceeds the distance to employment areas and a railway station, and slightly exceeds the distance to a secondary school and a GP surgery. Part of site also exceeds the maximum recommended distance to bus stops.

BIS2 (741) Ramsbrooks Farm, Land West of Guildford Road

- 5.31 **Maximum number of homes at 30dph:** 113 however, this higher capacity is subject to Natural England considering a SANG in the Thames Basin Heaths SPA 400m buffer zone is acceptable. If not, the maximum number of homes would be 99. Moreover, other constraints may further limit the capacity of the site, as set out below.

- 5.32 **Site positives:** The site is not affected by constraints relating to local nature reserves, ancient woodland, priority habitats, heritage, open spaces, agricultural land or flood risk. It is well-located in terms of shopping areas, primary schools, bus stops, outdoor and indoor leisure facilities.
- 5.33 **Potential issues and measures to overcome them:** Approximately half of the site lies within the Thames Basin Heaths SPA 400m buffer zone, which means that residential development on the site should be confined to the east and southeast of the site. The remainder of the site unconstrained by physical and absolute constraints could deliver 159 homes at 30dph. However, as this remainder of site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. 159 homes would require 3.18ha of SANG, however the provision of this SANG on-site would limit the area available for housing and it is very unlikely that the unconstrained part of site would be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD. The land within the 400m buffer on the site could accommodate 7.48ha of SANG, which could contribute to meeting the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD, but its suitability would need to be confirmed through site-level assessment to ensure that it meets the requirements of SANG. Overall, the site could therefore accommodate 113 homes and a SANG. However, if the land within the 400m buffer were found to be unsuitable, it is very unlikely that the site would be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD, in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that could be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.
- 5.34 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.200m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration.
- 5.35 Polledoak Slade & Short Siberia Range SNCI is adjacent to the site. If the SNCI is sensitive to recreation pressure, residential development at the site could impact upon the SNCI.
- 5.36 A row of trees with TPOs runs along part of the northern boundary of the site, but outside the site boundary. These could constrain site layout if their roots extend beneath the site.
- 5.37 The site has low-moderate landscape sensitivity to new housing developments. Although influenced by the urban edge the site retains a rural character and contributes to the setting of linear development alongside common land (a characteristic feature within the landscape character areas within which it is located). The eastern end of the site, closest to the edge of Bisley is considered to be slightly less sensitive to development than the western end. Impacts on the landscape due to development would need to be mitigated through sensitive site layout and design.
- 5.38 With regard to the Green Belt, the site is undeveloped countryside but existing adjacent development has led to some urbanising influence within the site. This site was assessed to perform weakly against Purpose 2, moderately in relation to Purpose 3 and make no contribution to Purposes 1 and 4.
- 5.39 The site, excluding the area within the Thames Basin Heaths SPA 400m buffer, exceeds the maximum recommended distance greatly to a hospital, moderately exceeds the distance to employment areas and a railway station, and slightly exceeds the distance to a secondary school and GP surgery.

BIS3 (800) The Miles Green Nursery

- 5.40 **Maximum number of homes at 30dph:** 99.
- 5.41 **Site positives:** The site has no significant physical constraints and is well-located for some local services; primary schools, outdoor and indoor leisure facilities. It is unconstrained by LNRs, ancient woodland, priority habitat, TPOs, agricultural land, or flood risk.
- 5.42 **Potential issues and measures to overcome them:** The area of the site unconstrained by physical and absolute constraints could deliver 123 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. It is very unlikely that the site will be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that can be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.
- 5.43 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.500m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest are Polledoak Slade & Short Siberia Range SNCI and Bisley Common SNCI, both c.200m away.
- 5.44 There is a possible heritage asset on site and part of the Surrey Heath Common Land semi-natural greenspace, which could both constrain site layout. Refer to **Appendix 3** for further detail.
- 5.45 The site has moderate landscape sensitivity to new housing development as it has no distinctive landscape elements but retains a rural character. In terms of Green Belt purposes, the site is lacking urban influence and so protects against encroachment. The site was assessed to perform strong in relation to NPPF Green Belt Purpose 3, moderate in relation to Purpose 2 and make no contribution Purposes 1 and 4.
- 5.46 The site exceeds the maximum recommended distance greatly to a hospital, moderately exceeds the distance to employment areas and a railway station, and slightly exceeds the distance to a secondary school, and GP surgery. The majority of site also exceeds the maximum recommended distance from bus stops and part of site exceeds the maximum recommended distance from shopping areas.

CHO1 (238) Mincing Lane Nursery, Mincing Lane

- 5.47 **Maximum number of homes at 30dph:** 48 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.48 **Site positives:** The site has no significant physical constraints and is well-located for some local services; shopping areas, bus stops, GP surgeries, outdoor and indoor leisure facilities. It is unconstrained by LNRs, ancient woodland, open spaces, agricultural land, or flood risk.
- 5.49 **Potential issues and measures to overcome them:** The site is within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.50 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Chobham Common SSSI (c.500m away), which is part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Little Heath SNCI, <100m away.

- 5.51 Deciduous woodland priority habitat covers much of the site. This should ideally be retained, which would significantly reduce the capacity of the site. If the priority habitat is to be lost, the harm in doing so in planning terms would need to be weighed by SHBC against the benefits of developing the site. There are also two trees with TPOs on the southern boundary of the site.
- 5.52 There are Grade II listed buildings adjacent to the site and their setting could be affected by development of the site. The wooded edge of the site, to a reasonable depth, would need to be maintained to protect their setting.
- 5.53 The site has low to moderate landscape sensitivity to housing development as, although the woodland on the site gives some sense of rurality and contributes to the wooded character of the local landscape, regenerated woodland is an everyday feature and the character of the site is influenced by residential development which encloses it on two sides. Development on the permitted Little Heath Nursery site to the west will add further containment.
- 5.54 In Green Belt terms, the site scores weakly, playing no role against Green Belt NPPF Purposes 1 and 4 and only a weak role in preventing the erosion of a gap between settlements (purpose 2) due to the extent of the gap to the north of Chobham. However, despite its proximity to urban development, it is undeveloped and as woodland it displays characteristics of the countryside (strong - Purpose 3).
- 5.55 The site greatly exceeds the maximum recommended distance to a railway station, moderately exceeds the recommended distance to employment areas and a hospital, and slightly exceeds the recommended distance to a primary school and secondary school. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent. Access to these could be improved through developer contributions off-site.

CHO2 (316) Leonard Daborn Ltd, Station Road

- 5.56 **Maximum number of homes at 30dph:** 6 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.57 **Site positives:** The site has no significant physical constraints and is well-located for most local services; shopping areas, primary schools, bus stops, GP surgeries, outdoor and indoor leisure facilities. It is unconstrained by LNRs, ancient woodland, priority habitat, TPOs, and open spaces.
- 5.58 **Potential issues and measures to overcome them:** This site is wholly within Flood Zone 3a and on Grade 3 agricultural land, which could preclude or significantly constrain development. Site-level flood risk assessment would be required to determine the potential capacity of the site and any required mitigation. Further investigation would be required to determine whether the agricultural land is 3a ('best and most versatile') or 3b. To comply with the NPPF, SHBC would need to demonstrate that poorer quality land was not available, prior to developing agricultural land.
- 5.59 The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.60 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. However, there are no SSSIs within 1km of the site. There are SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Mill Bourne SNCI, c.300m away.
- 5.61 The approximate line of a Roman Road passes through the site, so there is a possibility that there are previously unrecognised archaeological assets at the site.
- 5.62 The site has low landscape sensitivity to housing development as it makes no contribution to landscape or visual character of the surrounding area. It also makes no contribution to the Green Belt as it is already developed.

- 5.63 The site greatly exceeds the maximum recommended distance to a railway station, moderately exceeds the distance to a hospital, and slightly exceeds it to employment areas and a secondary school. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent. It is too small to provide on-site services or significant developer contributions.

CHO3 (409) Land at Latchetts Mead, Green Lane

- 5.64 **Maximum number of homes at 30dph:** 30 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.65 **Site positives:** The site is well-located for some local services (shopping areas, primary schools, bus stops, GP surgeries, outdoor and indoor leisure facilities) and is unconstrained by LNRs, ancient woodland, TPOs, open spaces and agricultural land.
- 5.66 **Potential issues and measures to overcome them:** A large proportion of the site is within Flood Zone 3a and the southern part of the site is in Flood Zone 2. This could preclude or significantly constrain development. Site-level flood risk assessment would be required to determine the potential capacity of the site and any required mitigation.
- 5.67 Deciduous woodland priority habitat is present across almost the entire site, so any development of the site would involve its loss. The degree of loss could be reduced by limiting the number of homes on the site, but any loss of priority habitat in planning terms would need to be weighed up by SHBC against the benefits of developing the site.
- 5.68 The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.69 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Chobham Common SSSI (c.1km away), which is part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Mill Bourne SNCI, <100m away.
- 5.70 The site has some archaeological potential, which would require further consideration.
- 5.71 The site has high landscape sensitivity to new housing development. It contributes highly to local landscape character as it contains mature oak woodland which is a valued landscape feature and screens views of the adjacent residential development from the publically accessible Chobham Meadows.
- 5.72 The mature oak woodland of the site plays a strong role in contributing to Green Belt Purpose 3 by containing the built edge of Chobham, thus limiting the impact residential development on the openness of the adjoining countryside of Chobham Meadows. However the site plays a weak role in preventing the merging of Chobham with nearby settlements (Purpose 2) and does not contribute to Purposes 2 and 4 of the Green Belt.
- 5.73 The site greatly exceeds the maximum recommended distance to a railway station, moderately exceeds it to a hospital, and slightly exceeds it to employment and a secondary school. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent.

CHO4 (414) Land north of Lakeside Drive, Chobham

- 5.74 **Maximum number of homes at 30dph:** 99 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.75 **Site positives:** The site has no physical constraints, is well-located for some local services (shopping areas, primary schools, bus stops, outdoor and indoor leisure facilities) and is unconstrained by LNRs, ancient woodland, TPOs, open spaces, agricultural land and flood risk.

- 5.76 **Potential issues and measures to overcome them:** The site could deliver 105 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. It is very unlikely that the site will be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that can be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.
- 5.77 Deciduous woodland priority habitat covers the whole site. Therefore, any development of the site would involve its loss. The degree of loss could be reduced by limiting the number of homes on the site, but any loss of priority habitat in planning terms would need to be weighed up by SHBC against the benefits of developing the site.
- 5.78 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. However, there are no SSSIs within 1km of the site. There are SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest are Broadford Meadows SNCI and Millbrook Meadows, both c.300m away.
- 5.79 There are Grade II listed buildings adjacent to the site that could be affected by development. The retention of trees around the site boundary would protect their setting.
- 5.80 The site has low to moderate landscape sensitivity as the secondary woodland on the site is a characteristic, if every day feature of the local landscape which provides a rural setting to the ribbon development along Castle Grove Road. However, it is influenced by adjacent development and is not visually prominent.
- 5.81 In Green Belt terms, the woodland serves a role in maintaining the relatively fragile countryside separation between Chobham and Castle Green, which in turn forms a significant proportion of the gap between Chobham and West End. The site was assessed to perform strong in relation to NPPF Green Belt Purpose 3, moderate in relation Purpose 2, weak in relation to Purpose 4 and make no contribution Purpose 1.
- 5.82 The site greatly exceeds the maximum recommended distance to a railway station and hospital, and slightly exceeds the distance to employment areas, a secondary school and a GP surgery. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent. Access to buses could be improved through developer contributions off-site.

CHO5 (447) Chobham Rugby Club, Windsor Road

- 5.83 **Maximum number of homes at 30dph:** 99.
- 5.84 **Site positives:** The site has no significant physical constraints, is well-located for some local services (shopping areas, primary schools, bus stops, GP surgeries, outdoor and indoor leisure facilities) and is unconstrained by LNRs, ancient woodland, priority habitat, TPOs, agricultural land and flood risk.
- 5.85 **Potential issues and measures to overcome them:** The site is a rugby club, which would be lost if the site was developed.
- 5.86 The area of the site unconstrained by physical and absolute constraints could deliver 102 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. It is very unlikely that the site will be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that can be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.

- 5.87 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Chobham Common SSSI (c.600m away), which is part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Little Heath SNCI (c.200m away).
- 5.88 There are Grade II listed buildings next to the site that could be affected by development, although high hedges provide some protection from this.
- 5.89 The site has low landscape sensitivity to housing development as the site lacks natural features and is significantly influenced and visually contained by the residential development that surrounds it. The open playing fields on the site are surrounded by urban development and so do not contribute to the purposes of the Green Belt.
- 5.90 The site greatly exceeds the maximum recommended distance to a railway station, moderately exceeds it to employment areas and a hospital, and slightly exceeds it a secondary school. The effects of development in relation to leisure facilities are uncertain, as development of the site would involve loss of playing pitches and indoor sports facilities, although other facilities are nearby. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent.

CHO6 (510) Land at Flexlands Farm, Station Road

- 5.91 **Maximum number of homes at 30dph:** 66 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.92 **Site positives:** The site has no physical constraints, is well-located for most local services (shopping areas, primary schools, bus stops, GP surgeries, outdoor and indoor leisure facilities) and is unconstrained by LNRs, ancient woodland, priority habitat or open spaces.
- 5.93 **Potential issues and measures to overcome them:** The site is wholly within Flood Zone 3a, which could preclude or significantly constrain development. Site-level flood risk assessment would be required to determine the potential capacity of the site and any required mitigation.
- 5.94 More than half of the site is Grade 3 agricultural land, which should ideally be retained. Development would therefore either be significantly limited or would result in the loss of agricultural land. Further investigation would be required to determine whether this is 3a ('best and most versatile') or 3b. To comply with the NPPF, SHBC would need to demonstrate that poorer quality land was not available, prior to developing agricultural land.
- 5.95 The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.96 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. However, there are no SSSIs within 1km of the site. There are SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Broadford Meadows SNCI (c.600m away).
- 5.97 A small part of the Chobham Village Conservation Area falls within the site; therefore, development of the site has the potential to affect its setting. The site has some archaeological potential; therefore heritage effects are uncertain and would require further investigation. Refer to **Appendix 3** for further detail.
- 5.98 The site has moderate to high landscape value to housing development as it is pastoral landscape located within the wider river floodplain along the Mill Bourne, strongly associated with Chobham Meadow which forms part of the rural setting to the historic core of Chobham and is prominent in views from the village. However, the site is influenced by ribbon development along its southern boundary.

- 5.99 The site is located in a relatively broad but fragile gap between settlements and so plays a moderate role in relation to Green Belt Purpose 2. However, its position within the stream valley along the Mill Bourne which extends from the historic core of Chobham to Chobham Meadows, means that it makes a strong contribution to Purposes 3 and 4. It does not lie adjacent to a large built up area and therefore make no contribution to Purpose 1.
- 5.100 The site greatly exceeds the maximum recommended distance to a railway station, moderately exceeds it to a hospital, and slightly exceeds it to employment areas and a secondary school. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent.

CHO7 (546) Land rear of The Grange

- 5.101 **Maximum number of homes at 30dph:** 45 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.102 **Site positives:** The site has no physical constraints, is well-located for most local services (shopping areas, primary schools, bus stops, GP surgeries, outdoor and indoor leisure facilities) and is unconstrained by LNRs, ancient woodland, open spaces or agricultural land.
- 5.103 **Potential issues and measures to overcome them:** Almost the entire site is covered by a TPO and is classed as deciduous woodland priority habitat. Approximately one third of the site is within Flood Zone 2 (with small areas of Flood Zone 3a). Any one of these constraints could be sufficient to preclude or significantly constrain development at the site. The site also has moderate to high landscape sensitivity to housing development as the broadleaved woodland of the site lends a rural character to the local landscape and provides part of the wider rural context to the historic core of the village. It is a relatively peaceful landscape despite its proximity to the settlement edge.
- 5.104 The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.105 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Chobham Common SSSI (c.600m away), which is part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Broadford Meadows SNCI (c.400m away).
- 5.106 There are potential heritage assets on the site that would require further investigation and could constrain site layout. Refer to **Appendix 3** for further detail.
- 5.107 If development of the site does occur, it should ideally take place in the north of the site, close to the existing settlement to avoid the area at risk of flooding. The loss of TPO and deciduous woodland in planning terms would need to be weighed by SHBC against the benefits of developing the site.
- 5.108 In Green Belt terms, the wooded rural character of the site creates a strong visual break between the edge of the village and settlements to the west. The site forms part of a larger coherent block of deciduous woodland which encloses the settlement and provides a wooded rural context for the Chobham Village Conservation Area. The site was assessed to perform moderately in relation to NPPF Green Belt Purpose 2 and strong in relation to Purposes 3 and 4. It makes no contribution to Purpose 1.
- 5.109 The site exceeds the recommended maximum distance from employment areas, secondary schools, railway stations and hospitals. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent.

CHO8 (548) Broadford, Castle Grove Road

- 5.110 **Maximum number of homes at 30dph:** 407 however, this higher capacity is subject to Natural England considering a SANG in the functional floodplain is acceptable. If not, the maximum number of homes would be 270. Moreover, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.111 **Site positives:** A significant number of homes could potentially be accommodated on this site. The site is well-located for some local services (shopping areas, primary schools, bus stops, outdoor and indoor leisure facilities) and is unconstrained by LNRs, ancient woodland, TPOs, or open spaces.
- 5.112 **Potential issues and measures to overcome them:** Much of the northern half of the site is constrained by functional floodplain as a stream runs through the site. Flood Zone 3a and 2 are therefore also present and cover much of the site. This is likely to preclude or significantly constrain the layout of development at the site.
- 5.113 The area of site unconstrained by physical and absolute constraints could deliver 540 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. 540 homes would require 10.8ha of SANG, however the provision of this SANG on-site would limit the area available for housing. The land within the functional floodplain on the site could accommodate 4.57ha of SANG, which could contribute to meet the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD, but its suitability would need to be confirmed through site-level assessment to ensure that it meets the requirements of SANG. Overall, the site could therefore accommodate 407 homes and a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD. However, if the land within the functional floodplain were found to be unsuitable, then the site would be able to deliver 270 homes and the required SANG.
- 5.114 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. However, there are no SSSIs within 1km of the site.
- 5.115 There is an area of deciduous woodland priority habitat on the site, but it coincides with an area of Flood Zone 3a, which is likely to limit development anyway. A small area of Grade 3 agricultural land is present in the north of the site.
- 5.116 An area of high archaeological potential extends into the site and a bridge on site is an undesignated heritage asset. The presence of Grade II listed buildings and Chobham Conservation Area, mean that the setting of heritage assets needs to be considered and could influence the layout of development at the site. This would require further investigation. Refer to **Appendix 3** for further detail.
- 5.117 The site has high landscape sensitivity to housing development as the tranquil pastoral fields and wet meadows of the site bounded by an intact network of hedgerows and woodland copses make a strong contribution to the local landscape character. The site also contributes strongly to Purposes 2, 3 and 4 of the Green Belt. Located within a shallow stream valley along the River Bourne, the undeveloped parcel has a strong pattern of pastoral fields which are well vegetated and riparian trees which provide a strong visual break between settlements. The open countryside character of the parcel acts as a green gateway to the historic core of the village. The site makes no contribution to Purpose 1.
- 5.118 The site, excluding the large area designated as Flood Zone 3b, greatly exceeds the maximum recommended distance to a railway station and hospital, and slightly exceeds it to employment areas, a secondary school and a GP surgery. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent. Access to these could be improved through developer contributions off-site.

CHO9 (597) Land northwest of The Grange

- 5.119 **Maximum number of homes at 30dph:** 45 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.120 **Site positives:** The site is well-located for most local services (shopping areas, primary schools, bus stops, GP surgeries, outdoor and indoor leisure facilities) and is unconstrained by LNRs, ancient woodland, open spaces or agricultural land.
- 5.121 **Potential issues and measures to overcome them:** The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.122 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Chobham Common SSSI (c.900m away), which is part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Broadford Meadows SNCI (c.400m away).
- 5.123 There are small areas of deciduous woodland priority habitat and Flood Zone 2 and 3a within the site, and there are potential undesignated heritage assets; these would constrain the layout of development at the site. Refer to **Appendix 3** for further detail. Almost half of the site is also covered by a TPO. Development would therefore either be significantly limited or would involve the loss of TPO trees. This would need to be weighed up in planning terms against the benefits of developing the site.
- 5.124 The site has moderate to high landscape sensitivity to housing development as the broadleaved woodland and small pastoral fields of the site lend a rural character to the local landscape and provide a part of the wider rural context to the historic core of the village. It is a relatively peaceful landscape despite its proximity to the settlement edge.
- 5.125 In Green Belt terms, the wooded site creates a strong visual break between the edge of Chobham and settlements to the west. The woodland forms part of a coherent block of deciduous woodland that extends between the settlement edge and the river floodplain to the south providing part of the wider rural context to the historic core of the village. The site was assessed to perform weak in relation to NPPF Green Belt Purposes 2, strong against Purposes 3 and 4 and make no contribution Purpose 1.
- 5.126 The site greatly exceeds the maximum recommended distance to a railway station, moderately exceeds it to employment areas and a hospital, and slightly exceeds it to a secondary school. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent.

CHO10 (755) Peerless Site, Windsor Court Road

- 5.127 **Maximum number of homes at 30dph:** 3.
- 5.128 **Site positives:** The site has no significant physical constraints, few environmental constraints, and is well-located for most local services; shopping areas, primary schools, bus stops, GP surgeries, outdoor and indoor leisure facilities.
- 5.129 **Potential issues and measures to overcome them:** The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.

- 5.130 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Chobham Common SSSI (c.600m away), which is part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNClS nearby that may be sensitive to development, for example recreational pressure. The nearest is Little Heath SNCl (c.200m away).
- 5.131 Although any development could have a landscape impact, the site is of low landscape sensitivity as it is previously developed land within an urban area. The site does not contribute to the NPPF Green Belt purposes.
- 5.132 The site exceeds maximum recommended distances to secondary schools (slightly), employment areas and hospitals (moderately), and railway stations (greatly). Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent. It is too small to provide on-site services or significant developer contributions off-site.

CHO11 (n/a) Fairoaks Airport

- 5.133 **Maximum number of homes at 30dph:** 2,037 within the Surrey Heath portion of site (the only part of site being considered for housing provision for the purposes of this study) however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.134 **Site positives:** A significant number of homes could potentially be accommodated on the site. The site is not affected by constraints relating to local nature reserves, TPOs, open spaces or agricultural land. Although it is poorly located in terms of existing infrastructure and services, it has the potential to provide significant on-site services, effectively as a new settlement.
- 5.135 **Potential issues and measures to overcome them:** There is a watercourse along the southern boundary. The southern fringe of the site is constrained by functional floodplain, where residential development would be unsuitable, and areas of Flood Zone 2 and 3a, where development would only be achievable subject to the sequential and exception tests.
- 5.136 Fairoaks Airport is a heritage asset in its own right (due to its military history) and includes a number of un-designated historic buildings. There are also buildings of high heritage importance close to the site that could have their setting affected by residential development of the site. Refer to **Appendix 3** for further detail. A comprehensive assessment of the site, including its surviving military heritage, would be required.
- 5.137 The large number of homes that could be accommodated at the site would require the provision of on-site SANG, and 2,037 homes would require 40.7ha of SANG. Part of the site lies within Runnymede Borough and is sufficiently large (43.2ha) that it could be used for this required SANG. Moreover, the functional floodplain present on the Surrey Heath part of site could deliver an additional 8.3ha of SANG but its suitability would need to be confirmed through site-level assessment to ensure that it meets the requirements of SANG. Moreover, if the number of homes is reduced due to flood risk constraints, areas at risk of flooding may also be suitable for use as SANG, but its suitability would again need to be confirmed through site-level assessment to ensure that it meets the requirements of SANG.
- 5.138 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSIs are Horsell Common SSSI (c.500m away) and Chobham Common SSSI (c.1km away), which are both part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration.
- 5.139 There are three areas of deciduous woodland priority habitat on the site. These should be retained to avoid negative impacts; however, the site is sufficiently large that this should be easy to achieve through sensitive layout of development.

- 5.140 The site has moderate to high landscape sensitivity to housing development. Despite the presence of large commercial buildings in the north west of the site, the open fields and deciduous woodland around the airfield lend a sense of rurality to the local landscape, forming part of the setting to the River Bourne to the south. The site is visually sensitive, with open views across the airfield to the wooded landscape to the south. The airfield area in isolation has low to moderate sensitivity, and for a smaller area of development focused on the existing airfield buildings and hardstanding areas, there would be potential to mitigate harm further through woodland planting to screen visual impact.
- 5.141 With regard to Green Belt, despite the presence of commercial buildings, the central airfield part of the Site (G52b) makes a weak contribution to Purpose 2 and a moderate contribution to Purpose 3 of the Green Belt. Open land to the northeast (G52c) and south (G52a) has a more rural character and makes a stronger contribution to Green Belt purposes. G52c makes a strong contribution to Purpose 2 and Purpose 3 and G52a makes a moderate contribution to Purpose 2 and strong contribution to Purpose 3. .
- 5.142 The site, excluding the large area designated as Flood Zone 3b, is not close enough to existing settlements to have good access to any services and scores poorly in terms of access to local employment areas, shopping areas, schools, transportation, health facilities and leisure facilities. Small-scale development at this site would therefore be unsustainable. However, a scale of development at the site that would effectively result in a new settlement would be able to support the provision of new services, although this would affect the overall capacity of the site.

WE1 (153) Land South of Fenns Lane/Land at Heathermead

- 5.143 **Maximum number of homes at 30dph:** 99 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.144 **Site positives:** The site is well-located for some local services (shopping areas, secondary schools, GP surgeries, outdoor and indoor leisure facilities) and is unconstrained by LNRs, ancient woodland, open spaces and agricultural land.
- 5.145 **Potential issues and measures to overcome them:** The southern half of the site is within the Thames Basin Heaths SPA 400m buffer and is therefore unsuitable for development. Much of the same area is also within Flood Zone 3a or 2, with a small area of functional floodplain. There is also a small area of Flood Zone 2 within area of the site outside the 400m buffer.
- 5.146 The area of site outside of the 400m buffer, and unconstrained by physical and other absolute constraints, could deliver 120 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. It is very unlikely that the site will be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that can be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.
- 5.147 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.200m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Matchett's Meadow SNCI (c.300m away).
- 5.148 There are undesignated heritage assets on the site and Grade II listed buildings nearby, whose settings could be affected by development. Refer to **Appendix 3** for further detail. These could constrain the layout of development at the site, as could an area of deciduous woodland priority habitat.

- 5.149 The site has moderate to high landscape sensitivity to housing development. The watercourses and associated wooded areas and small adjacent fields are the most sensitive part of the site. In Green Belt terms, all of the site is considered to have sufficient distinction from the urban edge to make a strong contribution to preventing encroachment on the countryside (Purpose 3). Land to the south of Trulley Brook also makes a strong contribution to preserving the settlement gap (Purpose 2) between West End and Bisley. The site makes no contribution to Purposes 1 and 4.
- 5.150 The site, excluding the area within the Thames Basin Heaths SPA 400m buffer, exceeds maximum recommended distances to primary schools (slightly), employment area (moderately), and railway stations and hospitals (greatly). Additionally, the majority of site slightly exceeds the maximum recommended distance to bus stops.

WE2 (233) Conifers Nursery, Bagshot Road

- 5.151 **Maximum number of homes at 30dph:** 21 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.152 **Site positives:** The site has no significant physical constraints, is well-located for some local services (schools, bus stops, outdoor and indoor leisure facilities) and is unconstrained by LNRs, ancient woodland, priority habitat, TPOs, heritage, or open spaces.
- 5.153 **Potential issues and measures to overcome them:** Approximately half of the site is Grade 3 agricultural land. Further investigation would be required to determine whether the agricultural land is 3a ('best and most versatile') or 3b. To comply with the NPPF, SHBC would need to demonstrate that poorer quality land was not available, prior to developing agricultural land.
- 5.154 A small area of the site is constrained by deciduous woodland priority habitat.
- 5.155 The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.156 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.1km away), which is part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. There are three 600m away.
- 5.157 The site has low landscape sensitivity to housing development as its proximity to urbanising development and lack of any strong connection to the adjacent river valley landscape mean that it has low landscape sensitivity. The site's horticultural use is not considered to reduce the Green Belt sense of openness as this an appropriate use within the Green Belt. However adjacent development and the lack of any significant association with the wider river valley countryside limit the contribution to the prevention of countryside encroachment (Purpose 3). The site was assessed to perform moderately in relation to Purpose 3, weak in relation to Purpose 2 and make no contribution to Purposes 1 and 4.
- 5.158 The site exceeds maximum recommended distances to shopping areas and GP surgeries (slightly), employment areas (moderately), and railway stations and hospitals (greatly).

WE3 (239) Land west of Fenns Lane

- 5.159 **Maximum number of homes at 30dph:** 78.
- 5.160 **Site positives:** The site is well-located for some local services (shopping areas, secondary schools, GP surgeries, and outdoor leisure facilities) and is unconstrained by LNRs, ancient woodland, priority habitat, TPOs, heritage, open spaces or agricultural land.
- 5.161 **Potential issues and measures to overcome them:** More than half of the site is within the Thames Basin Heaths SPA 400m buffer and is therefore unsuitable for residential development. The remainder of the site is within the 400m to 5km buffer zone; however the size of the site means that SANG provision can be met through developer contributions rather than on site.

- 5.162 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.200m away), which is part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Matchetts Meadow SNCI (c. 200m away).
- 5.163 The site has low to moderate landscape sensitivity to housing development as, although it is bordered on three sides by housing, it has sufficient boundary vegetation to retain some rural character, and its open fields have some landscape value. Although partially contained by development, the site retains some countryside character. Its structures are associated with former nursery uses, and so are not considered to compromise openness in Green Belt terms. The site was assessed to perform strongly in relation to Purpose 3, moderately in relation to Purpose 2 and make no contribution to Purposes 1 and 4.
- 5.164 The site, excluding the area within the Thames Basin Heaths 400m buffer zone, exceeds maximum recommended distances to primary schools, bus stops and indoor leisure facilities (slightly), employment areas (moderately), and railway stations and hospitals (greatly).

WE4 (374) Land at Pankhurst Farm

- 5.165 **Maximum number of homes at 30dph:** 99 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.166 **Site positives:** The site has no significant physical constraints and is well-located for some local services; schools, bus stops, outdoor and indoor leisure facilities. It is unconstrained by LNRs, ancient woodland, TPOs, open spaces or flood risk.
- 5.167 **Potential issues and measures to overcome them:** The majority of the site is Grade 3 agricultural land. Further investigation would be required to determine whether the agricultural land is 3a ('best and most versatile') or 3b. To comply with the NPPF, SHBC would need to demonstrate that poorer quality land was not available, prior to developing agricultural land.
- 5.168 The area of the site unconstrained by physical and absolute constraints could deliver 276 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. It is very unlikely that the site will be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that can be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.
- 5.169 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.1km away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Wet Meadows at Roselands SNCI (c.200m away).
- 5.170 The layout of development at the site could be constrained by areas of deciduous woodland priority habitat, and heritage assets adjacent to the site whose settings could be affected. Refer to **Appendix 3** for further detail.
- 5.171 The site has high landscape sensitivity to housing development as the wooded central part of the site, and land to the south of it, is isolated from urbanising influences and retains a strong rural character. Landscape character to the north is weaker, being affected by built development and traffic on the A319, so containing development in this area would reduce harm.

5.172 In Green Belt terms, the site is isolated from the settlement edge at West End, but at its northern end is affected by washed-over development along the A319. It makes a strong contribution to settlement separation (Green Belt Purpose 2) and a strong contribution to preventing countryside encroachment (Purpose 3). The site makes no contribution to Purposes 1 and 4.

5.173 The site exceeds maximum recommended distances to shopping areas and GP surgeries (slightly), employment areas (moderately), and railway stations and hospitals (greatly).

WE5 (799) Kingswood Pallets

5.174 **Maximum number of homes at 30dph:** 45 however, other constraints are likely to further limit the capacity of the site, as set out below.

5.175 **Site positives:** The site has no significant physical constraints and is well-located for some local services; shopping areas, secondary schools, bus stops, GP surgeries, outdoor and indoor leisure facilities. It is unconstrained by LNRs, ancient woodland, TPOs, heritage, open spaces or agricultural land.

5.176 **Potential issues and measures to overcome them:** The majority of the site is within Flood Zone 2, with areas of Flood Zone 3a in the north of the site. This could preclude or significantly constrain development and site-level flood risk assessment would be required to determine the potential capacity of the site and any required mitigation.

5.177 Approximately half of the site is deciduous woodland priority habitat, which should ideally be retained. Development of the site would therefore either be significantly limited or would involve the loss of priority habitat. This loss would need to be weighed in planning terms against the benefits of developing the site.

5.178 The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.

5.179 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.700m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is Bisley Village Green SNCI (c.300m away).

5.180 The site has low to moderate landscape sensitivity to housing development as proximity to the Bourne creates some sensitivity, but this is offset by the site's commercial use. In Green Belt terms, the site's commercial use affects countryside character, but it is distinct from the urban edge and plays a role in preserving the settlement gap between West End and Bisley. The site was assessed to perform strongly in relation to Purpose 2, moderately in relation to Purpose 3, make no contribution to Purposes 1 and 4.

5.181 The site exceeds maximum recommended distances to employment areas (moderately), and railway stations and hospitals (greatly). Part of site also exceeds the maximum recommended distance from primary schools.

WE6 (805) Land at 34 Streets Heath, West End

5.182 **Maximum number of homes at 30dph:** 21 however, other constraints are likely to further limit the capacity of the site, as set out below.

5.183 **Site positives:** The site has no physical constraints, few environmental constraints, and is well-located for some local services; shopping areas, schools, outdoor and indoor leisure facilities.

5.184 **Potential issues and measures to overcome them:** The whole site is Grade 3 agricultural land. Further investigation would be required to determine whether the agricultural land is 3a ('best and most versatile') or 3b. To comply with the NPPF, SHBC would need to demonstrate that poorer quality land was not available, prior to developing agricultural land.

- 5.185 The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.186 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.500m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is West End Churchyard SNCI (c.100m away).
- 5.187 The site has moderate landscape sensitivity to housing development as is adjacent to houses but its association with woodland on Streets Heath gives its landscape and visual value. In Green Belt terms, the site is adjacent to a line of houses, but its location in relation to Streets Heath means that it retains a degree of separation from the urban edge. The site was assessed to perform strongly in relation to Purpose 3, weak in relation to Purpose 2 and make no contribution to Purposes 1 and 4.
- 5.188 The site exceeds maximum recommended distances to bus stops and GP surgeries (slightly), employment area (moderately), and railway stations and hospitals (greatly). It is too small to provide on-site services or significant developer contributions off-site.

WE7 (806) Land at Fairfield Lane

- 5.189 **Maximum number of homes at 30dph:** 6 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.190 **Site positives:** The site has no physical constraints and is well-located for most local services; shopping areas, schools, bus stops, outdoor and indoor leisure facilities. It is unconstrained by LNRs, ancient woodland, priority habitat, open space, or flood risk.
- 5.191 **Potential issues and measures to overcome them:** The whole site is Grade 3 agricultural land. Further investigation would be required to determine whether the agricultural land is 3a ('best and most versatile') or 3b. To comply with the NPPF, SHBC would need to demonstrate that poorer quality land was not available, prior to developing agricultural land.
- 5.192 The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.193 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.600m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example recreational pressure. The nearest is West End Churchyard SNCI (c.300m away).
- 5.194 There are Grade II listed buildings adjacent to the site whose setting could be affected by development at the site. This could constrain site layout.
- 5.195 The site has low to moderate landscape sensitivity as it helps to retain some rural context for Fairfield Lane, but is too small and too closely associated with built development to have any great landscape sensitivity.
- 5.196 With regard to Green Belt, the Site will be influenced by the proximity of forthcoming development to the south of Fairfield Road, but its tree cover and connectivity with open land to the north give it a role in protecting the countryside from encroachment. The site was assessed to perform strongly in relation to Purpose 3, weak in relation to Purpose 2 and make no contribution to Purposes 1 and 4.
- 5.197 The site exceeds maximum recommended distances to employment areas, a railway station, GP surgeries and a hospital. It is too small to provide on-site services or significant developer contributions off-site.

WE8 (813) Land at Oak Farm House

- 5.198 **Maximum number of homes at 30dph:** 156 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.199 **Site positives:** The site is not affected by any physical or absolute constraints, or by constraints related to SNCIs, LNRs, ancient woodland, TPOs, open spaces or flood risk. A significant number of homes could potentially be accommodated on the site and it is well-located in terms of some local services; shopping areas, schools, bus stops, outdoor and indoor leisure facilities.
- 5.200 **Potential issues and measures to overcome them:** The area of site unconstrained by physical and absolute constraints could deliver 426 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. 426 homes would require 8.54ha of SANG, however the provision of this SANG on-site would limit the area available for housing and the site and would be very unlikely to deliver a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD. The site could therefore accommodate 156 homes and the required SANG.
- 5.201 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.900m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration.
- 5.202 There is deciduous woodland priority habitat across much of the site, which should ideally be retained. However, any significant development of the site would result in its loss. It may be possible to mitigate loss to an extent through sensitive layout of development, or reducing the development footprint but, where there is loss of priority habitat, the acceptability of development at the site in planning terms (e.g. Core Strategy Policy CP14A) would need to be weighed up.
- 5.203 There are listed buildings of high importance adjacent to the site that could have their setting affected by development at the site. Hatchgate Farmhouse; Beldam Bridge Farmhouse and barn are all Grade II listed buildings of high importance; and lie within 60m of site boundary. These are all currently set in comparatively open, rural landscape and visually separated from modern residential development. There is therefore the potential for moderate harm to the significance of the assets as a consequence of the loss of the rural setting. This would require further assessment to quantify and identify whether the impact can be mitigated.
- 5.204 The entire site is Grade 3 agricultural land. If this is Grade 3a - best and most versatile land; (which would require further investigation), development should ideally be located elsewhere, in line with the NPPF:
- "Paragraph 112: Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality."*
- 5.205 Two small waterbodies and an existing building are present on site, which would influence the layout of future development but would not preclude development.
- 5.206 The site has low-moderate landscape sensitivity to housing development. The site has some isolation from the urban edge, and plays a role in visually containing the West End, but its former nursery planting has limited its value in landscape terms. Retaining a strong boundary of vegetation would limit landscape harm resulting from development within the site.
- 5.207 With regard to Green Belt, the site's tree cover and its separation from the West End give it a strong role in preventing countryside encroachment, and it also contributes to the settlement gap between West End and Chobham. This site was assessed to perform moderately in relation to Purpose 2, strongly against Purpose 3 and make no contribution to Purposes 1 and 4.
- 5.208 The site exceeds maximum recommended distances to GP surgeries (slightly), employment areas (moderately), and railway stations and hospitals (greatly).

WIN1 (276) Land East of Snows Ride/Hatton Hill

- 5.209 **Maximum number of homes at 30dph:** 96.
- 5.210 **Site positives:** The site has no significant physical constraints, or constraints relating to SNCIs, LNRs, ancient woodland, priority habitats, open space, agricultural land or flood risk. It is well-located for some local services; primary schools, bus stops, outdoor and indoor leisure facilities.
- 5.211 **Potential issues and measures to overcome them:** The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.212 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSIs are Chobham Common SSSI and Broadmoor to Bagshot Woods and Heaths SSSI, which are c.2km away and part of the SPA. It may therefore be that the potential impact on the SSSIs from residential development is picked up by the required SPA mitigation; however, other potential impacts may need to be considered and ruled out.
- 5.213 There are potential effects on heritage assets that require further investigation to identify and may need to be mitigated. Whilst there are no recorded assets on site, there are two buildings that may be of heritage interest and whose setting may have the potential to be affected by development within the site. Refer to **Appendix 3** for further detail. This would require further investigation.
- 5.214 There are some TPO trees on the site and immediately adjacent that could constrain the layout of development.
- 5.215 The site has low-moderate landscape sensitivity to new housing developments. The site has no particular features or qualities to make it significantly sensitivity to development, but there is a degree of separation from the urban area of Windlesham. Preservation of the perimeter tree cover would be important in retaining the settlement-edge character of Snows Ride.
- 5.216 With regard to the Green Belt, Snows Ride creates a clear distinction between Windlesham and the adjacent countryside, but the Site's commercial uses have an impact on countryside character. The site was assessed to perform strongly in relation to Purpose 2, moderately in relation to Purpose 3 and make no contribution to Purposes 1 and 4.
- 5.217 The site exceeds maximum recommended distances to employment areas, a shopping area and secondary schools (slightly), railway stations and hospitals (moderately), and GP surgeries (greatly for the majority of site). Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent.

WIN2 (609) Land north Reserve Site, Heathpark Drive

- 5.218 **Maximum number of homes at 30dph:** 84 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.219 **Site positives:** The site has no significant physical constraints and is well-located for some services; shopping areas, bus stops, outdoor and indoor leisure facilities. It is unconstrained by LNRs, ancient woodland, heritage, open space, agricultural land or flood risk.
- 5.220 **Potential issues and measures to overcome them:** The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.221 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Chobham Common SSSI (c.800m away), which is part of the Thames Basin Heaths SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that may be sensitive to development, for example increased recreational pressure. The nearest is Sunningdale Golf Course SNCI (c.600m away).

- 5.222 The site is wooded and the layout of development would be further constrained by the presence of deciduous woodland priority habitat and TPO trees.
- 5.223 The site has moderate to high landscape sensitivity to housing development as its woodlands are characteristic of the Borough and their containment provides separation from urbanising influences. The location of the site means that it plays an important role in connecting woodlands to either side of Chertsey Road, and in providing a woodland area between the settlement edge and Updown Court. Retention of woodland belts along the Chertsey Road and Updown Court boundaries would reduce harm. In Green Belt terms, the wooded site has strong distinction from the adjacent settlement, and an absence of urbanising influences, and so makes a strong contribution preventing encroachment of the countryside (Green Belt purpose 3). The site was assessed to perform weakly in relation to Purpose 2, make no contribution to Purposes 1 and 4.
- 5.224 The site exceeds maximum recommended distances to employment areas, primary schools and secondary schools (slightly), GP surgeries and hospitals (moderately), and railway stations (greatly). Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent.

WIN3 (737) Land at Swift Lane

- 5.225 **Maximum number of homes at 30dph:** 198 however, other constraints are likely to further limit the capacity of the site, as set out below
- 5.226 **Site positives:** A significant number of homes could potentially be accommodated on the site and it is well-located in terms of most local services; employment, primary schools, bus stops, outdoor and indoor leisure facilities. The site is not affected by constraints relating to LNRs, ancient woodland, TPOs, open spaces or agricultural land.
- 5.227 **Potential issues and measures to overcome them:** The area of site unconstrained by physical and absolute constraints could deliver 468 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. 468 homes would require 9.34ha of SANG, however the provision of this SANG on-site would limit the area available for housing. The site could therefore accommodate 198 homes and a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD.
- 5.228 A watercourse runs through the site, which creates a small area of absolute constraint (functional floodplain) but is also associated with a large area at risk of flooding. Approximately half of the site is in Flood Zone 2 (medium risk of flooding), with a narrow corridor of Flood Zone 3a (high risk of flooding) alongside the watercourse. Development should avoid areas of medium or high flood risk, where possible. The 'sequential test' is used to steer development towards areas of lowest flood risk and, where this is not available, the 'exception test' is used to demonstrate that flood risk will be managed satisfactorily so that development can occur in higher risk areas. Areas of site that are not suitable for residential development due to flood risk could be used for SANG provision, but the suitability of the land would need to be confirmed through site-level assessment to ensure that it meets the requirements of SANG. This site will therefore require detailed flood risk assessment and design to quantify the number of homes that could be accommodated and the achievability of development.
- 5.229 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.700m away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. There are also SNCIs nearby that could be affected by development. The nearest is Lightwater County Park SNCI (c.500m away).
- 5.230 Areas of deciduous woodland priority habitat are present in the east and northwest of the site, covering a large portion of the site overall. However, these largely coincide with areas of Flood Zone 2. The area of the site not at risk of flooding (most of the southern half) is almost entirely unconstrained by priority habitat.

- 5.231 There is a heritage asset on the site, of low importance, that could be affected by development and would require further assessment: HER site (MSE14457) 'Stonehill', a potential medieval settlement site.
- 5.232 The site has moderate landscape sensitivity to housing development. The site's woodland elements, open fields and watercourse have landscape value, but perceptual qualities are compromised by the adjacent land uses and the major road. Woodland at the eastern end of the site is significant in terms of screening development and preserving the well-wooded character of the landscape. Preservation of the site's woodland elements and retention of a buffer along the Windle Brook would reduce potential landscape harm resulting from development.
- 5.233 With regard to Green Belt, the A322 creates strong separation between the site and the urban area, although current adjacent land uses and the proximity of the main road have some impact on countryside character. The site also contributes to settlement separation between Bagshot and Windlesham. This site was assessed to perform moderately in the northern area of the site and strongly elsewhere against Purpose 2, strongly against Purpose 3 and makes no contribution to Purposes 1 and 4.
- 5.234 The site slightly exceeds the maximum recommended distance to a shopping area, secondary school, GP surgery (majority of site), and railway station (part of the site); and moderately exceeds the distance to a hospital. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent. Access to these could be improved through developer contributions off-site.

WIN4 (807) Land east of Sunninghill Road, Windlesham

- 5.235 **Maximum number of homes at 30dph:** 99 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.236 **Site positives:** The site has no significant physical constraints, few environmental constraints and is well-located for some local services; primary schools and bus stops.
- 5.237 **Potential issues and measures to overcome them:** The area of the site unconstrained by physical and absolute constraints could deliver 126 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. It is very unlikely that the site will be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that can be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.
- 5.238 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. There are no SSSIs or SNCIs within 1km of the site.
- 5.239 Deciduous woodland priority habitat occupies about half of the site and should ideally be retained. Development would therefore either be limited to the north of the site or would need to be justified in planning terms against the loss of priority habitat.
- 5.240 The site has moderate landscape sensitivity to housing development as its woodland contributes to its separation from the urban edge and to perceptions of this as a rural area. In Green Belt terms, the A30 and strong tree cover along its northern edge mark a clear boundary to Windlesham, beyond which urbanising development would constitute a significant encroachment into countryside, and would also reduce separation between Windlesham and Sunninghill. The site was assessed to perform strongly in relation to Purpose 3, moderately in relation to Purpose 2 and make no contribution to Purposes 1 and 4.
- 5.241 The site exceeds the maximum recommended distances to all services either partly, slightly or moderately, with the exception of primary schools and bus stops. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent.

WIN5 (808) Land off Broadway Road, Windlesham

- 5.242 **Maximum number of homes at 30dph:** 18.
- 5.243 **Site positives:** The site has no significant constraints, few environmental constraints and is well-located for some local services; shopping areas, bus stops, outdoor and indoor leisure facilities.
- 5.244 **Potential issues and measures to overcome them:** The site lies within the 400m to 5km Thames Basin Heaths SPA buffer but, as it cannot accommodate greater than 100 homes, would not need to provide on-site SANG. Instead, developers would need to contribute to and/or make use of off-site SANG provision.
- 5.245 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. There are no SSSIs within 1km but there are SNCIs nearby that may be sensitive to development, for example increased recreational pressure. The nearest is Manor Farm Wood SNCI (c.700m away).
- 5.246 The site has low to moderate landscape sensitivity to housing development as its trees have some value in helping to define the settlement edge. The site makes only a weak contribution to Green Belt purposes. The site was assessed to perform weakly in relation to Purposes 2 and 3, makes no contribution to Purposes 1 and 4.
- 5.247 The site moderately exceeds the recommended maximum distances to a railway station and hospital, and slightly exceeds the recommended maximum distance to employment areas, primary schools and GP surgeries, and partially exceeds the recommended maximum distance to secondary schools. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent. It is too small to provide on-site services or significant developer contributions off-site.

WIN6 (809) Land East of Snows Ride, Windlesham

- 5.248 **Maximum number of homes at 30dph:** 201.
- 5.249 **Site positives:** A significant number of homes could potentially be accommodated on the site and it has no significant physical constraints. The site is not affected by constraints relating to LNRs, ancient woodland, heritage, open spaces, agricultural land or flood risk. The site is well-located for secondary schools and bus stops.
- 5.250 **Potential issues and measures to overcome them:** The area of site unconstrained by physical and absolute constraints could deliver 471 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. 471 homes would require 9.42ha of SANG, however the provision of this SANG on-site would limit the area available for housing. The site could therefore accommodate 201 homes and a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD.
- 5.251 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. There are no SSSIs within 1km but there are SNCIs nearby that may be sensitive to development, for example increased recreational pressure. The nearest is Sunningdale Golf Course SNCI (c.700m away).
- 5.252 The layout of development at the site could be slightly constrained by the presence of deciduous woodland priority habitat and TPO trees around some of the site's edges.
- 5.253 The site has moderate landscape sensitivity to housing development as its visual openness and strong tree lines give a degree of landscape sensitivity. In Green Belt terms, the site forms an important element of the gap between Windlesham and Sunningdale, and is undeveloped and largely contained from urbanising influences. The site was assessed to perform moderately in relation to Purpose 3, strongly in relation to Purpose 2 and make no contribution to Purposes 1 and 4.

- 5.254 The site exceeds the maximum recommended distances to all services, with the exception of secondary schools and bus stops. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent. Access to these could be improved through developer contributions off-site.

WIN7 (810) Land South of Church Road

- 5.255 **Maximum number of homes at 30dph:** 99 however, other constraints are likely to further limit the capacity of the site, as set out below.
- 5.256 **Site positives:** A significant number of homes could potentially be accommodated on the site. It is not affected by constraints relating to LNRs, ancient woodland, priority habitats, TPOs, open spaces or flood risk. The site is well-located for shopping areas, bus stops and outdoor leisure facilities.
- 5.257 **Potential issues and measures to overcome them:** The area of the site unconstrained by physical and absolute constraints could deliver 288 homes at 30dph. However, as the site is within the Thames Basin Heaths SPA 400m to 5km buffer, development greater than 100 homes on the site would require on-site SANG. It is very unlikely that the site will be capable of delivering a SANG that meets the requirements of the Thames Basin Heaths Special Protection Area Avoidance Strategy SPD in addition to a quantum of development exceeding 100 units. As such it is likely that the maximum number of homes that can be delivered on this site would be limited to 99 and developers would need to contribute to and/or make use of off-site SANG provision.
- 5.258 Most of the site is Grade 3 agricultural land. If this is Grade 3a (to be determined following further investigation), then development should ideally be located elsewhere, in line with the NPPF.
- 5.259 The presence of the site within a SSSI impact risk zone means that potential impacts on nearby SSSI(s) would need to be assessed at the site level and any necessary mitigation agreed with Natural England. The nearest SSSI is Colony Bog and Bagshot Heath SSSI (c.1.2km away), which is part of the SPA. Potential impacts associated with recreation will therefore be picked up by the requirement for SPA mitigation, but there may be other impacts associated with development that require consideration. SNCIs could also potentially be affected by development. The nearest is Manor Farm Wood SNCI.
- 5.260 The site has high archaeological potential and is crossed by a possible Roman Road; which would require further assessment.
- 5.261 The site has low to moderate landscape sensitivity to housing development. The site's containment between Windlesham and the M3 limits its landscape value, but its elevation creates some distinction from the settlement edge and creates some visual sensitivity. Additional screening along the western boundary, with locally appropriate, native species, would reduce the impact on views from rights of way to the west.
- 5.262 With regard to Green Belt, the site's landform gives it some distinction from the urban edge, but containment between the southern edge of Windlesham and the M3 has an impact on its countryside character. This site was assessed to perform moderately against Purpose 2, strongly against Purpose 3 and make no contribution to Purposes 1 and 4.
- 5.263 The site exceeds the maximum recommended distances to all services, with the exception of shopping areas, bus stops and outdoor leisure facilities. Although the site is well located in terms of distance to bus stops, it is also noted that bus services in this area are infrequent.

Summary of mitigation that may be required

- 5.264 Although this study considers constraints that can be assessed at a strategic level, each potential site will need to be considered in detail. It may not be possible to mitigate some impacts, i.e. if the impact is too great and mitigation is not physically possible, or the costs of doing so are too high.

5.265 Location-specific impacts will therefore need to be identified and mitigation developed at the detailed masterplanning stage in conjunction with relevant stakeholders. The approach to mitigating the potential impacts, as discussed above, is summarised in **Table 5.1**.

Table 5.1: Approaches to mitigation

Constraint	Mitigation approach
<p>Thames Basin Heaths 400m-5km buffer zone</p> <p>SSSI impact risk zone</p>	<p>Sites with >100 homes are expected to provide on-site SANG, while sites with fewer homes can contribute to or make use of off-site SANG provision. All sites need to contribute to SAMM.</p> <p>The Borough-wide impact of housing development on European sites (SPA/SAC) would also be assessed as part of SHBC's Habitats Regulations Assessment.</p> <p>Mitigation for impacts to the SSSIs will depend on the nature of the SSSIs. Impacts on a SSSI from a specific development would be assessed by an ecologist as part of a planning application and any mitigation agreed with Natural England.</p>
<p>LNR or SNCI</p>	<p>Mitigation for impacts to LNRs or SNCIs will depend on the nature of the wildlife sites.</p> <p>Partial or complete loss of this type of site would require mitigation for the specific types of habitats or species affected, for example compensatory habitat provision. This could be difficult to achieve, depending on the scale of the impact and habitats / species involved.</p>
<p>Ancient woodland</p> <p>Priority habitat</p>	<p>Ancient woodland is woodland that has existed continuously since at least 1600. It is therefore not possible to replace.</p> <p>Mitigation for impacts to priority habitat will depend on the habitat affected.</p> <p>It may be possible to compensate for the loss of priority habitat elsewhere, although this will be harder for habitats that are slow- or difficult to establish, such as woodland.</p>
<p>Heritage assets</p>	<p>Heritage assets cannot be replaced, although development may be appropriate in proximity to them if undertaken sensitively. Mitigation could include minimising excavation, a programme of archaeological / heritage recording, and/or design that minimises visual impacts and any impacts to the setting of historic assets.</p>
<p>Open spaces and playing pitches</p>	<p>Open spaces and playing pitches provide amenity and contribute to the network of greenspace in the Borough. Loss of specific features should therefore be considered with reference to overall greenspace provision and the potential wider recreational/ecological effects on any connected greenspaces.</p> <p>Where replacement features are appropriate, care would need to be taken to ensure that the function of the feature is maintained and that it is accessible to those who use it.</p>

Constraint	Mitigation approach
Agricultural land (Grade 1-3)	<p>Although it would be difficult to replace or mitigate lost productive land, it may be possible to compensate for economic impacts and improve the productivity of other areas.</p> <p>More detailed ALC assessments may be needed to identify which Grade 3 land is 'best and most versatile' i.e. 3a so that this can be avoided. Loss of higher grade agricultural land would only be in line with the NPPF, if alternative lower grade agricultural land was not available.</p>
Flood risk	<p>The NPPF requires areas of low flood risk to be prioritised for development over areas of medium or high risk (the sequential test). Where development cannot be sited in a lower risk area, development in higher risk area may be appropriate, providing that it can demonstrate that flood risk will be managed such that the site will be safe and not worsen flood risk elsewhere (the exception test).</p> <p>Site-specific flood risk assessment is often required as part of a planning application.</p>
Landscape	<p>In line with the NPPF, valued landscaped should be protected and enhanced. This would generally be achieved either by avoiding development in the most sensitive locations or through sensitive layout and design of the proposed development.</p>

5.266 Any of the constraints could prevent residential development from being acceptable, if mitigation cannot be achieved at a specific site. There are also a number of types of constraints that it is not possible to take into account at the strategic level of this study and which would need to be identified at the site level. For example: impacts on protected species, site-level flood risk assessment, contaminated land, and visual impacts. Mitigation may also be required for these.

6 Conclusions

- 6.1 The achievability of residential development for each site is presented in **Chapter 5** and supported by the detailed assessments in **Appendices 3-6**.

Comparison of the assessed sites

- 6.2 The sites fall into four categories, as summarised below.

Relatively constrained larger sites

- 6.3 The following potential housing sites have significant environmental constraints that would limit and could preclude development. Further assessment would be required to determine the capacity of the sites for development, but the conclusions of this initial assessment indicate that some development may be possible at the sites, despite the constraints:

- BIS2 Ramsbrooks Farm, Land West of Guildford Road (maximum 113 homes);
- CHO8 Broadford, Castle Grove Road (maximum 407 homes);
- CHO11 Fair Oaks Airport (maximum 2,037 homes);
- WE8 Land at Oak Farm House (maximum 156 homes); and
- WIN3 Land at Swift Lane (maximum 198 homes).

- 6.4 These sites would need to provide a SANG on site.

Relatively unconstrained larger sites

- 6.5 The following site could accommodate greater than 100 homes but, at this stage, does not appear to have constraints that would significantly limit its capacity. This would need to be confirmed through more detailed site assessments:

- WIN6 Land East of Snows Ride, Windlesham (maximum 201 homes).

Relatively constrained smaller sites

- 6.6 The following sites appear to have the potential to accommodate 100 homes or less, but have environmental constraints that would limit capacity and could preclude development:

- CHO1 Mincing Lane Nursery, Mincing Lane (maximum 48 homes);
- CHO2 Leonard Daborn Ltd, Station Road (maximum 6 homes);
- CHO3 Land at Latchetts Mead, Green Lane (maximum 30 homes);
- CHO4 Land north of Lakeside Drive, Chobham (maximum 99 homes);
- CHO6 Land at Flexlands Farm, Station Road (maximum 66 homes);
- CHO7 Land rear of The Grange (maximum 45 homes);
- CHO9 Land northwest of The Grange (maximum 45 homes);
- WE1 Land South of Fenns Lane / Land at Heathermead (maximum 99 homes);
- WE2 Conifers Nursery, Bagshot Road (maximum 21 homes);
- WE4 Land at Pankhurst Farm (maximum 99 homes);
- WE5 Kingswood Pallets (maximum 45 homes);
- WE6 Land at 34 Streets Heath, West End (maximum 21 homes);

- WE7 Land at Fairfield Lane (maximum 6 homes);
- WIN2 Land north of Reserve Site, Heathpark Drive (maximum 84 homes);
- WIN4 Land east of Sunninghill Road, Windlesham (maximum 99 homes); and
- WIN7 Land South of Church Road (maximum 99 homes).

Relatively unconstrained smaller sites

6.7 The following sites have the capacity to accommodate less than 100 homes and appear to be relatively unconstrained, but their suitability for development would still need to be confirmed with more detailed site assessments:

- BAG1 Grove End (maximum 99 homes);
- BIS1 Land East of Clews Lane (maximum 99 homes);
- BIS3 The Miles Green Nursery (maximum 99 homes);
- CHO5 Chobham Rugby Club, Windsor Road (maximum 99 homes);
- CHO10 Peerless Site, Windsor Court Road (maximum 3 homes);
- WE3 Land west of Fenns Lane (maximum 78 homes);
- WIN1 Land East of Snows Ride / Hatton Hill (maximum 96 homes); and
- WIN5 Land off Broadway Road, Windlesham (maximum 18 homes).

Next steps

6.8 This work is intended to inform SHBC's identification of suitable housing sites, as part the preparation of its new Local Plan. This study has brought together information from a number of sources and mapped the various environmental and service constraints to development that exist within key sites within the Green Belt in the Borough. Although it is not possible as part of this study to identify which sites are definitively suitable for residential development, it has been possible to identify the key strategic constraints to development, and the type of mitigation that may be required to enable residential development to take place.

6.9 Although this study has considered cumulative impacts at the site level, it is not possible as part of this study to consider the cumulative impacts of the collective development of a number of sites, particularly at the Borough scale. These issues would need to be considered as part of the next stage of assessment, once decisions had been taken about which sites may be suitable for allocation. The potential suitability of specific sites will ultimately come down to their 'viability' and levels of 'acceptability', which in turn will be influenced by the mitigation measures proposed and how well they can be implemented. Should the Borough decide to allocate land for development, any such mitigation should then be embedded in policy guidance or masterplans that are prepared as part of the Local Plan process.

6.10 The Council will need to determine if there are any overriding exceptional circumstances to warrant the consideration of removal of sites from the Green Belt, however it is not guaranteed that any sites will be identified for release. To determine if there are any exceptional circumstances to warrant the consideration of removal of sites from the Green Belt, it will be necessary to look at the objectively assessed needs for development, the performance of land within the Green Belt against the NPPF Green Belt purposes, the need to promote sustainable patterns of development and whether these needs can be accommodated without releases from the Green Belt, including within the wider housing market area. These considerations should be balanced against an assessment of whether the release of land from the Green Belt would provide sustainable development options which are not available in other areas of the Borough and the wider Housing Market Area.

Appendix 1 - Green Belt sites assessed

The table below lists the sites considered in this assessment.

LUC reference	SLAA reference	Site name	Area (ha) (taken from GIS data)	Potential number of homes (based on 30dph,) Assuming no constraints taken into account	Potential number of homes (based on 30dph, subject to detailed review) Assuming constraints taken into account
Sites in Bagshot					
BAG1	736	Grove End	5.0	150	99
Sites in Bisley					
BIS1	740	Land East of Clews Lane	8.2	246	99
BIS2	741	Ramsbrooks Farm, Land West of Guildford Road	13.1	393	113
BIS3	800	The Miles Green Nursery	4.1	123	99
Sites in Chobham					
CHO1	238	Mincing Lane Nursery, Mincing Lane	1.6	48	48
CHO2	316	Leonard Daborn Ltd, Station Road	0.2	6	6
CHO3	409	Land at Latchetts Mead, Green Lane	1.0	30	30
CHO4	414	Land north of Lakeside Drive, Chobham	3.5	105	99
CHO5	447	Chobham Rugby Club, Windsor Road	3.4	102	99
CHO6	510	Land at Flexlands Farm, Station Road	2.2	66	66
CHO7	546	Land rear of The Grange	1.5	45	45
CHO8	548	Broadford, Castle Grove Road	22.6	678	407
CHO9	597	Land northwest of The Grange	1.5	45	45
CHO10	755	Peerless Site, Windsor Court Road	0.1	3	3
CHO11	n/a	Fairoaks Airport	123.8, of which 80.6 (c.65%) is within Surrey Heath and available for housing. The rest is in	2,418 (in the Surrey Heath proportion of site)	2,037

LUC reference	SLAA reference	Site name	Area (ha) (taken from GIS data)	Potential number of homes (based on 30dph,) Assuming no constraints taken into account	Potential number of homes (based on 30dph, subject to detailed review) Assuming constraints taken into account
			Runnymede and earmarked as SANG.		
Sites in West End					
WE1	153	Land South of Fenns Lane/Land at Heathermead	7.4	222	99
WE2	233	Conifers Nursery, Bagshot Road	0.7	21	21
WE3	239	Land west of Fenns Lane	5.9	177	78
WE4	374	Land at Pankhurst Farm	9.2	276	99
WE5	799	Kingswood Pallets	1.6	48	45
WE6	805	Land at 34 Streets Heath, West End	0.7	21	21
WE7	806	Land at Fairfield Lane	0.2	6	6
WE8	813	Land at Oak Farm House	14.2	426	156
Sites in Windlesham					
WIN1	276	Land East of Snows Ride/Hatton Hill	3.2	96	96
WIN2	609	Land north Reserve Site, Heathpark Drive	2.8	84	84
WIN3	737	Land at Swift Lane	15.9	477	198
WIN4	807	Land east of Sunninghill Road, Windlesham	4.2	126	99
WIN5	808	Land off Broadway Road, Windlesham	0.6	18	18
WIN6	809	Land East of Snows Ride, Windlesham	15.7	471	201
WIN7	810	Land South of Church Road	9.6	288	99

Appendix 2 - Data and information used

GIS data

GIS layers	Source	Constraint Level
Background mapping and assessment boundaries		
OS Base Maps 1:10k, 1:25k, 1:50k	Emapsite	n/a
Aerial photography	ESRI	n/a
Site boundaries (SLAA)	SHBC	n/a
Green Belt parcels	SHBC	n/a
SANGS	SHBC	n/a
Physical constraints		
Rivers and lakes	Ordnance Survey OpenMap Local	Physical constraint
Railway lines	Ordnance Survey OpenMap Local	Physical constraint
Dual carriageway, A road, primary road	Ordnance Survey OpenMap Local	Physical constraint
Other roads	Ordnance Survey OpenMap Local	Physical constraint
Buildings	Ordnance Survey OpenMap Local	Physical constraint
Oil and gas pipelines	SHBC	Non-absolute physical constraint
Safeguarded transport sites	SHBC	Non-absolute physical constraint
Farnborough Airport Public Safety Zone	SHBC	Physical constraint
Environmental constraints		
Special Area of Conservation (SAC)	Natural England	Absolute constraint
Special Protection Area (SPA)	Natural England	Absolute constraint
Thames Basin Heaths SPA 400m buffer	Generated by LUC	Absolute constraint
Thames Basin Heaths 400m-5km buffer	Generated by LUC	Non-absolute constraint
Sites of Special Scientific Interest (SSSI)	Natural England	Absolute constraint
SSSI Impact Risk Zones	Natural England	Non-absolute constraint
National Nature Reserves (NNR)	Natural England	Absolute constraint
Sites of Nature Conservation Interest (SNCI)	SHBC / Surrey Nature Partnership	Non-absolute constraint
Local Nature Reserves (LNR)	SHBC	Non-absolute constraint
Ancient Woodland Inventory	Natural England	Non-absolute constraint
Priority Habitat Inventory	Natural England	Non-absolute constraint
Scheduled Monuments	Historic England	Non-absolute constraint
Listed Buildings	Included in HER data	Non-absolute constraint
Registered Parks & Gardens	Historic England	Non-absolute constraint
Conservation Areas	SHBC	Non-absolute constraint

GIS layers	Source	Constraint Level
Areas of High Archaeological Potential and County Sites of Archaeological Importance	SHBC	Non-absolute constraint
Undesignated heritage assets (HER)	Surrey County Council Hampshire County Council Berkshire Council	Non-absolute constraint
Locally listed buildings	SHBC	Non-absolute constraint
Historic landscape characterisation	Surrey County Council Sourced from Archaeology data service website	Non-absolute constraint
Open spaces, including playing pitches	SHBC	Non-absolute constraint
Surrey Landscape Character Areas	Not available in GIS form. Online sources viewed instead	Non-absolute constraint
Contaminated land	Not available	n/a
Agricultural Land Classification	Natural England	Non-absolute constraint
Flood Zone 2	Environment Agency	Non-absolute constraint
Flood Zones 3	Environment Agency	Non-absolute constraint
Flood Zones 3b	SHBC	Absolute constraint
Flood Storage Areas	Environment Agency	Non-absolute constraint
Infrastructure and services		
Core Employment Areas	SHBC	Infrastructure
District/Local Centres	SHBC / OS mapping	Infrastructure
Primary schools	Surrey County Council	Infrastructure
Secondary schools	Surrey County Council / OS mapping	Infrastructure
Railway stations	Ordnance Survey OpenMap Local	Infrastructure
Bus stops	NaPTAN	Infrastructure
GP surgeries	OS Data Commons	Infrastructure
Hospitals	OS OpenMapLocal	Infrastructure
Sports facilities, open space and recreation facilities	SHBC	Infrastructure

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