

View Response

Response #1228808

From

[REDACTED]
[REDACTED]

Date

Started: 02 Sep 2024 10:46. Last modified: 02 Sep 2024 10:46

Status

Complete

Title

Mr

First Name

Nicholas

Last Name

Whittington

Organisation

Pegasus Group

Job Title

Senior Planner

Address Line 1

[REDACTED]

Address Town

[REDACTED]

Address County

[REDACTED]

Address Post Code

[REDACTED]

Which of the following categories best describes you?

Planning Consultant

Which local areas of Surrey Heath are you specifically interested in?

Windlesham

Which topic areas are you specifically interested in?

Employment and Economy

Environment and Biodiversity

Housing

Sustainability

Visibility

Unknown.

Introduction

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)

Please fill in a separate form for each representation you wish to make.

To view Surrey Heath Borough Council's Privacy Statement, please visit our [website](#).

Please read the separate guidance notes found under "supporting documents" before completing and submitting this form.

Part A - Personal Details

Part A - Personal Details

1

First name

You must provide an answer to this question.

2

Last name

You must provide an answer to this question.

3

Job title (where relevant)

Senior Planner

4

Organisation (where relevant)

Pegasus Group

5

Do you wish to be notified when the Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?

You must provide an answer to this question.

☒

Yes

☐

No

6

Do you wish to be notified when the independent examiner's recommendations are published?

You must provide an answer to this question.

☒

Yes

☐

No

7

Do you wish to be notified when the Local Plan has been adopted?

You must provide an answer to this question.

☒ Yes

☐ No

Please note

After completing Part A of this Online Response Form, please click "Save answers" below to ensure your information is submitted correctly.

Please note that your formal comments (known as representations) and your name will be made available on the Council's website. All other details in Part A of this form containing your personal details will not be shown.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B - Representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

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8

What paragraph does your representation relate to? (E.g., "2.14")

«No response»

9

What policy does your representation relate to? (E.g., "SS1")

You must provide an answer to this question.

«No response»

10

What else does your representation relate to? (E.g., any other detail, such as "policies map", "table", "appendix", etc.)

To which part of the Pre-Submission Local Plan does this representation relate? You must include: (1) the paragraph number; (2) the policy; or, (3) any other detail, e.g., policies map, table, appendix, etc.

«No response»

11

Do you consider the Pre-Submission Local Plan to be legally compliant? (please refer to guidance notes)

You must provide an answer to this question.

- ☐ Yes
- ☐ No
- ☐ Don't know

12

Do you consider the Pre-Submission Local Plan to be sound? (please refer to guidance notes)

You must provide an answer to this question.

- ☐ Yes
- ☐ No
- ☐ Don't know

13

Do you consider that the Pre-Submission Local Plan complies with the Duty to Co-operate? (please refer to guidance notes)

You must provide an answer to this question.

- ☐ Yes
- ☐ No
- ☐ Don't know

14

Please give details of why you consider the Pre-Submission Local Plan to be legally compliant. Please be as precise as possible.

You must provide an answer to this question.

«No response»

15

Please give details of why you consider the Pre-Submission Local Plan is **not** legally compliant. Please be as precise as possible.

You must provide an answer to this question.

«No response»

16

Please give details of why you consider the Pre-Submission Local Plan to be sound. Please be as precise as possible.

You must provide an answer to this question.

«No response»

17

Please give details of why you consider the Pre-Submission Local Plan to be **not** sound. Please be as precise as possible.

You must provide an answer to this question.

«No response»

18

Please give details of why you consider the Pre-Submission Local Plan to be compliant with the Duty to Co-operate. Please be as precise as possible.

You must provide an answer to this question.

«No response»

19

Please give details of why you consider the Pre-Submission Local Plan to **not** be compliant with the Duty to Co-operate. Please be as precise as possible.

You must provide an answer to this question.

«No response»

20

Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant, having regard to the matters you have identified.

(Please note that non-compliance with the Duty to Co-operate is incapable of modification at examination)

You will need to say why each modification will make the Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

You must provide an answer to this question.

«No response»

21

Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan sound, having regard to the matters you have identified.

(Please note that non-compliance with the Duty to Co-operate is incapable of

modification at examination)

You will need to say why each modification will make the Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

You must provide an answer to this question.

«No response»

22

If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

You must provide an answer to this question.

- ☐ Yes, I wish to participate at the oral examination.
- ☐ No, I do not wish to participate at the oral examination.

23

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary.

(Please note, the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.)


You must provide an answer to this question.

«No response»

End of representation

Thank you for answering the above questions and completing this representation.

You should receive a confirmation email once you have submitted your representation.

	<p align="center">Surrey Heath Borough Council</p> <p align="center">Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</p> <p align="center">Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to: planning.consultation@surreyheath.gov.uk
OR
Planning Policy and Conservation, Surrey Heath Borough Council,
Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)

Please fill in a separate sheet for each representation you wish to make.

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Part A

1. Personal Details*		2. Agent's Details (if applicable)
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Title	Mr	Mr
First Name	Jack	Rob
Last Name	Stirling	Henderson
Job Title (where relevant)		Director
Organisation (where relevant)	Retirement Villages Group	Pegasus Group
Address Line 1		3 West Links
Line 2		Tollgate
Line 3		Chandlers Ford
Post Code		SO53 3TG
Telephone Number		[REDACTED]

E-mail Address

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	X	
• The independent examiner's recommendations are published?	X	
• The Local Plan has been adopted?	X	

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Part B – Please use a separate sheet for each representation

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Name or Organisation :

Retirement Villages Group

3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph

Policy

SS1

Other, e.g.
policies map,
table, appendix

Policies Map

4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)

Yes

X

No

4.(2) Sound (please refer to guidance notes)

Yes

No

4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)

Yes

X

No

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Pre-Submission Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. You are advised to read our Representations Guidance note for more information on legal compliance and soundness.

SEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024.

Paragraph 35a of the NPPF requires Local Plans to be positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs.

The Borough's current standard method housing need figure is 321 per annum, whilst the Government's proposed LHN figure is 658 per annum. This is an increase of 389 dwellings per annum, significantly beyond the DRAFT NPPF transitional arrangement allowance (-200 dwellings per annum) for advanced emerging Local Plans. This shortfall needs to be met. In its current form, the Plan is therefore not positively prepared or justified.

Furthermore, this shortfall must be met otherwise the Local Plan would not be found sound against the fourth test of soundness as listed in part d of paragraph 35, which requires local plans to be consistent with national policy.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above.
(Please note that non-compliance with the duty to co-operate is incapable of modification at examination)
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SEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024.

The Council need to be more positive and proactive to ensure that these needs are met, by allocating more sites specifically to meet the need for housing with care. This should include the release of sites from the Green Belt, where appropriate.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒


Yes, I wish to participate at the oral examination

Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate.

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To expand upon the reasoning outlined above and in the supporting written representations.

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	<p align="center">Surrey Heath Borough Council</p> <p align="center">Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</p> <p align="center">Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)

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Part A

1. Personal Details*		2. Agent's Details (if applicable)
<small>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</small>		
Title	Mr	Mr
First Name	Jack	Rob
Last Name	Stirling	Henderson
Job Title (where relevant)		Director
Organisation (where relevant)	Retirement Villages Group	Pegasus Group
Address Line 1		3 West Links
Line 2		Tollgate
Line 3		Chandlers Ford
Post Code		SO53 3TG
Telephone Number		[REDACTED]

E-mail Address

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	X	
• The independent examiner's recommendations are published?	X	
• The Local Plan has been adopted?	X	

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Part B – Please use a separate sheet for each representation

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Name or Organisation :	Retirement Villages Group
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3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	HA1	Other, e.g. policies map, table, appendix	Policies Map
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4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (please refer to guidance notes)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

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SEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024

Under policy HA1, just three sites are allocated for extra care or residential care uses. In total, these 3 sites are expected to deliver (per their allocation and associated policy text) just 124 extra care or residential care units across the plan period to 2038.

The Borough has a considerable and growing elderly population, coupled with an identified current need for extra and residential care. This need is not being responded to by the small number of allocations (just 124 units) in the Local Plan for this specialist housing type and is therefore not positively prepared, justified or consistent with national policy.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above.
(Please note that non-compliance with the duty to co-operate is incapable of modification at examination)

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SEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024.

Taking account of the existing 46-unit scheme at Bagshot, the Council has identified a current shortfall of 313 units for housing with care. The allocation of Land east of Snows Ride, Windlesham would provide an additional 154 specialist homes. This single allocation would meet nearly 50% of the identified shortfall to help address the current deficiency in the provision for housing with care.

Land at Snows Ride should be allocated for the provision of specialist older persons accommodation and the Policies Map updated accordingly to include the allocation and amend the Green Belt boundary to remove the site from the Green Belt.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒


Yes, I wish to participate at the oral examination

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Part A

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First Name	Jack	Rob
Last Name	Stirling	Henderson
Job Title (where relevant)		Director
Organisation (where relevant)	Retirement Villages Group	Pegasus Group
Address Line 1		3 West Links
Line 2		Tollgate
Line 3		Chandlers Ford
Post Code		SO53 3TG
Telephone Number		[REDACTED]

E-mail Address

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	X	
• The independent examiner's recommendations are published?	X	
• The Local Plan has been adopted?	X	

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Part B – Please use a separate sheet for each representation

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Name or Organisation :	Retirement Villages Group
-------------------------------	---------------------------

3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	HA1	Other, e.g. policies map, table, appendix	Policies Map
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4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (please refer to guidance notes)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

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SEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024.

Under policy HA1, just three sites are allocated for extra care or residential care uses. In total, these 3 sites are expected to deliver (per their allocation and associated policy text) just 124 extra care or residential care units across the plan period to 2038.

The Borough has a considerable and growing elderly population, coupled with an identified current need for extra and residential care. This need is not being responded to by the small number of allocations (just 124 units) in the Local Plan for this specialist housing type and is therefore not positively prepared, justified or consistent with national policy.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination)

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SSEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024.

The addition of Policy HA1/29 - Land east of Snows Ride, Windlesham, would ensure the plan is positively prepared, justified and consistent with national policy.

Propose amending Policy HA1 – Housing Allocations, to include the allocation of Land east of Snows Ride, Windlesham (HA1/29). The addition of this single allocation would meet nearly 50% of the identified shortfall to help address the current deficiency in the provision for housing with care.

Land at Snows Ride should be allocated for the provision of specialist older persons accommodation and the Policies Map updated accordingly to include the allocation and amend the Green Belt boundary to remove the site from the Green Belt.

(Continue on a separate sheet / expand box if necessary)

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No, I do not wish to participate at the oral examination

☒


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Name or Organisation :

Retirement Villages Group

3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph

Policy

H5

Other, e.g.
policies map,
table, appendix

Policies Map

4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)

Yes

X

No

4.(2) Sound (please refer to guidance notes)

Yes

No

4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)

Yes

X

No

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

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SEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024.

This Policy is supported. There is currently no local policy context with which to secure self- and custom-build housing in the Borough. Due to the lack of a policy instrument in the adopted Local Plan to deliver self- and custom-building housing, there is clearly unmet demand over previous years.

This Policy ensures the new local plan would be consistent with national policy.

(Continue on a separate sheet / expand box if necessary)

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(Please note that non-compliance with the duty to co-operate is incapable of modification at examination)

You will need to say why each modification will make the Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024.

The delivery of self- and custom-building plots for offer to those on the register in Surrey Heath is clearly a significant benefit, and one which is being provided over and above current and proposed policy requirements. This element of the proposed development at Land at Snows Ride is an important delivery benefit and provides yet further justification for the allocation of Land east of Snows Ride, Windlesham under Policy HA1.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

☐

No, I do not wish to participate at the oral examination

☒


Yes, I wish to participate at the oral examination

Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate.

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

To expand upon the reasoning outlined above and in the supporting written representations.

Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

	<p align="center">Surrey Heath Borough Council</p> <p align="center">Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</p> <p align="center">Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to: planning.consultation@surreyheath.gov.uk

OR

Planning Policy and Conservation, Surrey Heath Borough Council,
Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)

Please fill in a separate sheet for each representation you wish to make.

Surrey Heath Borough Council's Privacy Statement is [here](#).

Please read the [separate guidance notes](#) before completing this form.

Part A

1. Personal Details*		2. Agent's Details (if applicable)
<small>*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.</small>		
Title	Mr	Mr
First Name	Jack	Rob
Last Name	Stirling	Henderson
Job Title (where relevant)		Director
Organisation (where relevant)	Retirement Villages Group	Pegasus Group
Address Line 1		3 West Links
Line 2		Tollgate
Line 3		Chandlers Ford
Post Code		SO53 3TG
Telephone Number		[REDACTED]

E-mail Address

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	X	
• The independent examiner's recommendations are published?	X	
• The Local Plan has been adopted?	X	

Please note that your formal comments (known as representations) and your name will be made available on the Council's website. All other details in Part A of this form containing your personal details will not be shown.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B – Please use a separate sheet for each representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :

Retirement Villages Group

3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph

Policy

H6

Other, e.g.
policies map,
table, appendix

4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)

Yes

X

No

4.(2) Sound (please refer to guidance notes)

Yes

No

4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)

Yes

X

No

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Pre-Submission Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. You are advised to read our Representations Guidance note for more information on legal compliance and soundness.

SEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024

Generally supportive of this policy. However, Part 3 of the policy states that sites of 10 or more self-contained specialist homes should deliver an *'appropriate proportion of affordable homes as evidenced by an independent viability assessment'*. This is contrary to the Council's own evidence which confirms (at paragraph 6.36 of the Local Plan Viability Assessment, March 2024, Three Dragons), that *"Specialist older persons housing was not viable in either value area, on greenfield or brownfield land, even without affordable housing."*

As such, it is not based upon proportionate evidence and is therefore not justified.

(Continue on a separate sheet / expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above.

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination)
You will need to say why each modification will make the Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SEE ACCOMPANYING WRITTEN REPRESENTATIONS DATED SEPTEMBER 2024.

Part 3 of the policy should be deleted.

In the event that this part of the policy remains, an upper limit affordable housing figure that applies specifically to Specialist Housing should be added. This maximum threshold should be based on robust viability assessment of Specialist Housing.

Further sites, including Land east of Snobs Ride, Windlesham, should be allocated for this type of development, alongside the 3 proposed at HA1/26-28. In the absence of allocations that deliver the required quantum of specialist homes for older people, the LP is unsound.

These additional allocations could be provided either through the specific H6 Specialist Housing policy itself or through Policy HA1 Housing Allocations.

(Continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

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No, I do not wish to participate at the oral examination

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To expand upon the reasoning outlined above and in the supporting written representations.

Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Written Representations.

Surrey Heath Local Plan 2019–2038 (Regulation 19 Consultation).

In support of Affordable and Self-Build homes, GP surgery, an Integrated Retirement Community, and Suitable Alternative Natural Greenspace.

Land at Snows Ride, Windlesham, Surrey GU20 6LA

For and on behalf of Retirement Villages Group.

September 2024.



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1.0 Introduction.

1.1 The following representations are made by Pegasus Group on behalf of our client, Retirement Villages Group (RVG). They are made in response to the current consultation by Surrey Heath Borough Council (SHBC) following publication of their Pre-Submission Regulation 19 Local Plan. We understand that this consultation is running between **7th August 2024 – 20th September 2024**.

1.2 RVG have an interest in land at Snows Ride, Windlesham, and are currently progressing an outline planning application for the development of this site.

1.3 The live planning application (reference: 24/0428/OOU) submitted by RVG seeks planning permission for the following:

Outline planning application with all matters reserved other than means of access, for mixed residential development comprising up to 154 Integrated Retirement Community units (Use Class C2) and 33 dwellings (Use Class C3), together with a GP Surgery, the creation of Suitable Alternative Natural Greenspace, landscaping, car parking, access, maintenance workshop, refuse storage, and communal facilities.

The Illustrative Masterplan submitted in support of the planning application is appended at Appendix 1.

1.4 These representations, the live planning application, and previous promotional efforts proactively set out the justification for allocating Snows Ride as a sustainable and attractive site for specialised housing for older people.

1.5 For the reasons set out in these representations, we strongly recommend that the site be allocated ahead of submission of the Surrey Heath Local Plan to the secretary of state for examination.

Agent	Client
Mr Rob Henderson Director Pegasus Group 3 West Links Tollgate Chandlers Ford Hampshire SO53 3TG	Retirement Villages Group 2 nd Floor, 52 Grosvenor Gardens LONDON SW1W OAU

2.0 Demography & Strategic Policies

Demography

- 2.1 Paragraph 1.34 of the Reg 19 Plan summarises the demographic trends prevailing in Surrey Heath. It states:

'The demographic and socio-economic profile of the Borough is characterised by an ageing population. This presents future challenges for housing, health, employment and social support.'

- 2.2 This is reinforced by the findings of the 2011 and 2021 census. The population in Surrey Heath is growing, albeit at a slower rate than the country and region generally, and the Borough has an ageing population, with a '34% increase in residents aged 70–74 years' (para 1.35). This is a considerable growth in the proportion of elderly residents in the Borough which needs to be pro-actively addressed through the Local Plan.

- 2.3 During the plan period, the population within the Borough is expected to age further: with a forecast '45.6% increase in residents aged between 75 and 84, and a 77.1% increase in residents aged 85 or over. This is compared to a 6% increase in residents aged under 65%' (para 1.35). This is a critical situation.

- 2.4 Paras 1.36 – 1.46 of the Reg 19 Local Plan summarise that the area is an expensive place to live, with house prices above the national average, relatively low levels of deprivation and poverty compared to the national average, good education and health facilities and outcomes, a broad range of formal and informal open spaces and playing pitches, and a strong economic base.

- 2.5 In summarising the key relevant demographic and contextual challenges to be addressed by the emerging Local Plan, the Reg 19 LP at paragraph 1.59, confirms the following:

*'Providing a range of housing which helps meet the needs of all of the Borough's residents needs to be addressed through the provision of an appropriate mix of housing. **In particular, the Borough has high house prices and there is a need to ensure the availability of affordable housing, as well as meeting the needs of an aging population**'. [Pegasus emphasis added]*

- 2.6 The above challenge is acknowledged by Strategic Objective A (para 1.66) of the Reg 19 Local Plan, which seeks to deliver sustainable development that contributes to meeting housing needs, providing new homes of an appropriate mix and tenure, including the provision of affordable and specialist housing needs.

- 2.7 These are all important contextual factors for both the emerging Local Plan and the material planning considerations that are applicable to the proposed development of Land at Snows Ride for mixed-use development, led by an Integrated Retirement Community.

Strategic Policies

Policy SS1: Spatial Strategy

- 2.8 Rather than setting out a pro-active context to the spatial strategy for the Local Plan, Section 2 commences with reference to the approximately half of the Borough which is designated as Green Belt. The Thames Basin Heath SPA designation which covers large sections of the Borough is certainly a significant environmental constraint which places restrictions on new development, however the Green Belt is not an environmental constraint, so should not be referenced as such.
- 2.9 Paragraph 2.5 of the Reg 19 LP confirms that the NPPF suggests that local plans need to use the Government's Standard Method for calculating local housing needs, as set out in the PPG. Para 2.5 of the emerging plan states that this is 'the advisory starting point'; however the DRAFT NPPF recently published by the new Labour Government has revoked this wording (para 62 of the DRAFT NPPF, Jul 2024) which needs to be addressed before the plan is submitted for examination by the SoS. While it is acknowledged that the transitional arrangements set out in Para 226 of the DRAFT NPPF allow for Local Plans to be examined under the previous framework if submitted to the SoS 1 month after the adoption of the new NPPF, in accordance with Para 227 of the DRAFT NPPF, where local plans reach adoption with an annual housing requirement that is more than 200 dwellings lower than the relevant Local Housing Need figure, *Local Authorities will be expected to commence plan-making in the new plan-making system at the earliest opportunity to address the shortfall in housing need.*
- 2.10 Para 2.7-2.8 of the Reg 19 plan sets out the Borough's Local Housing Need (LHN) standard method LHN figure of 5,578 homes. This is reduced from the actual figure of 6,111 (321 homes per year), because the Hart Local Plan 2032 accommodates 41 dwellings per annum of unmet need arising in Surrey Heath to 2032 (533 homes in total).
- 2.11 However, the Reg 19 plan still makes provision for 6,012 dwellings to be delivered across the plan period (321 homes per year), ensuring a housing supply buffer against the Housing Requirement.
- 2.12 Whilst this buffer is welcome, the main and unavoidable concern with the housing numbers to be delivered by the Reg 19 Local Plan is the recent DRAFT publication of the Government's new standard method housing figures.
- 2.13 The Borough's current standard method housing need figure is 321 per annum, whilst the Government's proposed LHN figure is 658 per annum. This is an increase of 389 dwellings per annum, significantly beyond the DRAFT NPPF transitional arrangement allowance (-200 dwellings per annum) for advanced emerging Local Plans.
- 2.14 This shortfall needs to be met, and concern is raised at this stage that the plan would be both unsound, and not legally compliant with the emerging NPPF at the time of examination, regardless of any transitional arrangements that might be in place. At the point of adoption, the Plan may still be considered out of date because it would not make provision for a 5 year housing land supply.

Policy HA1: Housing Allocations

- 2.15 Under policy HA1, just three sites are allocated for extra care or residential care uses. These are:
- HA1/26 – Pinehurst, 141 Park Road, Camberley
 - HA1/27 – Land at Loen, St Catherines Road, Deepcut
 - HA1/28 – 61–63 London Road, Camberley
- 2.16 In total, these 3 sites are expected to deliver (per their allocation and associated policy text) just 124 extra care or residential care units across the plan period to 2038.
- 2.17 A care home is proposed to be delivered as part of Policy HA4 (Mindenhurst, Deepcut), but it is unclear how many bedrooms this will deliver, and is an alternative use from the older-persons accommodation being delivered through policies HA1/26, 27 and 28.
- 2.18 Despite the demographic trends referenced in Section 2 and paragraphs 1.34 – 1.59 of the Reg 19 Plan, the Council are planning to deliver only 124 extra-care or residential care uses for older persons during the plan period to 2038.

Need for housing with care and residential care in Surrey Heath

- 2.19 The Council have provided an updated Local Housing Needs Assessment (LHNA, March 2024) as part of the evidence base for the Reg 19 Local Plan. This provides an analysis of the need for housing for older people in Surrey Heath.
- 2.20 It confirms that the population of older persons is increasing and will drive a need for housing which is capable of meeting the needs of older persons (para 9.2).
- 2.21 Paragraph 9.14 of the LHNA states that there is likely to be an increased requirement for specialist housing options moving forward. These include age-restricted market housing, retirement living or sheltered housing, extra care or housing-with-care, and residential care homes and nursing homes.

2.22 Table 9.6 of that Assessment sets out the specialist housing need using adjustments which reflect the relative health of older people in Surrey Heath, and a tenure split for housing with support and housing with care categories.

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall / surplus (-ve)	Addition -al demand to 2040	Shortfall /surplus by 2040
Housing with support	Market	72	501	655	154	364	517
	Affordable	38	314	342	28	190	217
Total (housing with support)		110	815	996	181	553	735
Housing with care	Market	30	46	267	221	148	369
	Affordable	10	0	92	92	51	143
Total (housing with care)		40	46	359	313	199	512
Residential care home bedspaces		35	253	319	66	177	243
Nursing care home bedspaces		40	871	359	-512	199	-313
Total bedspaces		75	1,124	677	-447	376	-70

Older Persons Housing Need (LHNA 2024 Table 9.6)

2.23 The table indicates a current (2024) demand for 359 extra care units, rising to 512 by 2040.

2.24 Current supply is noted in the table as 46, which includes a single new development in Bagshot. However, the lead-in time for planning, build-out, marketing, sale and occupation is considerable and there must be a robust planning policy framework to deliver this important dwelling type/tenure, or else the shortfall will continue to grow.

2.25 It is the case that the Council has identified a current shortfall of 313 units for housing with care, taking account of the existing 46-unit scheme at Bagshot. This rises to a shortfall of 512 units by 2040 (per Table 9.6 LHNA).

2.26 Meanwhile, there is a current shortfall of 66 units for residential care, rising to 243 by 2040 (per Table 9.6 LHNA).

2.27 Thus, on the Council's figures, there is a demonstrated need for extra and residential care which is considerably over and above the amount being allocated for (just 124 extra and residential care units in the Reg 19 plan to 2040), and already a shortfall, which will increase across the plan period.

2.28 Our client would refer to the current live planning application on this site (reference: 24/0428/OOU) in setting out their own assessment of the current and developing need for this type of accommodation.

2.29 A report prepared with the live planning application finds that based on the 'Housing in Later Life' target provision rates, there is a **current** need for 315 additional units of 'Housing with Care' for owner occupiers and 583 additional units of 'Retirement Housing' for owner occupiers in Surrey Heath.

- 2.30 In summary, regardless of the measurement year or adjustments for the health and wellbeing of residents in Surrey Heath, the Borough has a considerable and growing elderly population, coupled with an identified current need for extra and residential care. This need is not being responded to by the small number of allocations (just 124 units) in the Local Plan for this specialist housing type.

Pipeline for Housing for Older People in Surrey Heath

- 2.31 The LHNA makes an attempt to set out the 'pipeline' of planning permissions which would help address identified need at para 9.32, as below:
- 12/O546 – Princess Royal Barracks Brunswick Road, Deepcut Camberley, GU16 6RN – includes a 60 bed care home
 - 18/O613 – Land at 84 – 100 Park Street, Camberley, GU15 3NY – 61 sheltered units
 - 18/1083 – 42–44 London Road, Bagshot, GU19 5HL – 46 extra care apartments
 - 17/O647 – Orchard Cottage, Shepherds Lane, Windlesham, Surrey, GU20 6HL – 65 bed care home
 - 20/O921/CEU – Pinewood, 93 College Ride, Bagshot, GU19 5E9 – 69 bed care home
 - 19/2318 – 156 Mytchett Road Mytchett Camberley Surrey GU16 6AA – two additional bedrooms in care home
- 2.32 This pipeline, however, is dominated by care homes (196 out of 303 units). Only 46 units of this supply is for the type of accommodation provided by the allocations referenced above and sought to be delivered under draft Policy H6 (see below).
- 2.33 The Council therefore does not have a pipeline of planning permissions suitable to address the shortfall of unmet need in the short term, nor are they allocating sufficient land to meet demand in the medium / long term.

Policy H6: Specialist Housing

- 2.34 This DRAFT policy is extracted in full, below, due to its relevance to the site which is the subject of this promotional exercise.

POLICY H6: Specialist Housing

- 1) Proposals for the development of specialist housing including suitable supported or extra care housing and registered bed spaces in residential care homes will be permitted, provided they:
 - a) meet the identified needs of older people and households with specific needs that are evident at the time of the proposal;
 - b) are supported by the appropriate authorities responsible for primary health care and social care provision, taking account of the increased demands associated with the proposal's occupiers;
 - c) will be suitable for the intended occupiers having regard to the quality and type of facilities, the level of independence and the provision of support and/or care;
 - d) will be accessible to local shops, services, public transport and community facilities, where appropriate to the needs of the intended occupiers;
 - e) will not result in the over-concentration of specialist housing in a particular locality, leading to a material change in character; and,
 - f) will not have a detrimental impact on the vitality or viability of Camberley Town Centre, where the proposal is located in or adjacent to the Town Centre.
- 2) The mix of tenures negotiated by the Council will have regard to advice from the appropriate authorities responsible for primary health care and social care provision, as necessary.
- 3) Where viable, sites of 10 or more self-contained specialist homes should deliver an appropriate proportion of affordable homes as evidenced by an independent viability assessment.
- 4) Proposals that would involve a net loss of specialist housing units or bed spaces, will only be permitted where appropriate replacement specialist accommodation will be provided that satisfies the criteria (1) of this policy, or it is demonstrated, using local evidence including the [Local Housing Need Assessment](#), that there is no local need for the existing type of specialist housing to be retained.
- 5) Where permission is granted for specialist accommodation, the Council reserves the right to use a legal agreement to ensure that proposals are retained for their permitted use.

Draft Policy HA6, Specialist Housing – Reg 19 Plan

- 2.35 This DRAFT policy text is supported. Our client's proposals fully accord with its requirements. The current outline planning application with Surrey Heath Borough Council for determination meets the needs of older people and households with specific needs that are evident at the current time, and accords with all criterion set out in point 1 (a-f) of the policy text.
- 2.36 The site also delivers an appropriate proportion of much-needed affordable housing in tandem.
- 2.37 Retirement Villages Group emphasise however that this Policy, on its own, is not sufficient to respond to the considerable shortfall in specialist housing which is proposed to be allocated for within the Reg 19 Local Plan. Paragraph 63 of the DRAFT NPPF is clear that within the context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This includes housing for older people (including those who require retirement housing, housing-with-care and care homes). By failing to allocate enough land for the quantum of need identified in both the Council's own needs assessment (which is considered to be conservative by RVG) and the assessment carried out by RVG, the Local Plan is unsound.

The Authority will be aware that the planning system places considerable burdens on applicants and limited certainty of success for much-needed older-persons accommodation proposals. Allocating the current outline application site at Snows Ride provides a clear way of addressing the identified shortfall in a manner that is consistent with emerging policy and removes this uncertainty.

- 2.38 Pursuing planning permission for this important and much-needed specialist housing without the certainty of a site allocation presents significant risks and viability implications for developers. Further sites should be allocated for this type of development, alongside the 3 proposed at HA1/26-28. In the absence of allocations that deliver the required quantum of specialist homes for older people, the LP is unsound.

3.0 The Green Belt

- 3.1 The Council has taken the decision not to release any development in the Green Belt for residential development as they do not consider that exceptional circumstances exist to release land from the Green Belt for this purpose.
- 3.2 From a development management perspective, the live planning application on the site for the proposed Integrated Retirement Community (amongst other uses), sets out that the proposed development of the site should be granted planning permission due to the Very Special Circumstances (VSC) that outweigh the harm to the Green Belt, and any other harm, in accordance with NPPF paragraph 153.
- 3.3 This is set out in Section 7 of the Planning Statement for the current application (ref. 24/0428/OOU).
- 3.4 The remainder of this section discusses the Council's evidence base and its assessment of the Green Belt 'function' of Land at Snows Ride.

Surrey Heath Local Plan: Green Belt Review (Addendum and Additional Assessment, December 2023)

- 3.5 The approach of the SHBC Reg 19 Local Plan is to not release any land from the Green Belt for residential development.
- 3.6 The Council has prepared repeated assessments relating to the Green Belt, including most recently, a Green Belt Review (Addendum and Additional Assessment, December 2023). The purpose of the Review was to provide evidence of how different areas within the Borough perform against the Green Belt purposes set out in national policy.
- 3.7 Importantly, the stated intention of the Green Belt Review is to provide part of the necessary evidence base to determine whether there are the exceptional circumstances to warrant an alteration to the Green Belt boundaries at both a high level, and at a local level.
- 3.8 Helpfully, the Green Belt Review provides the entire subject site with a reference of 'SR9' (Land to the north east of Hatton Hill and the south of the A30 London Road). In other Green Belt reviews the site is referenced as '809'. The site is found to serve no Green Belt Function against purposes 1 (to check unrestricted sprawl of large built up areas) and 4 (preserve the setting and special character of historic towns) of the Green Belt.
- 3.9 The assessment also finds that the site has a strong function against purposes 2 (to prevent neighbouring towns merging) and 3 (safeguarding the countryside from encroachment).
- 3.10 The overall assessment therefore remains that the site is 'high functioning' against the Green Belt purposes, and is at moderate risk if considered as part of a wider impact assessment, if released on an individual basis from its Green Belt designation.

- 3.11 Previous representations to the Surrey Heath emerging Local Plan in respect of Land at Snows Ride have set out a finer grain detailed assessment of the subject site's Green Belt function (Appendix 3). This assessment concurred with the Council's findings regarding function 1 and 4 (i.e no function) but disagreed with the findings relating to functions 2 and 3 of the Green Belt. This is reiterated below.
- 3.12 In relation to Green Belt purpose 2, the nearest settlement, Sunningdale, is located to the north-east, and any development on land east of Snows Ride would not bring about any level of coalescence. Whilst the Site is seen as an open green paddock on an aerial image, in reality, the perception of the settlement gap is created by the lack of visibility of built form, and the wooded verdant and green nature of the route along London Road. Snows Ride makes very little contribution to Green Belt purpose 2 (*to prevent neighbouring towns merging into one another*). Development in the form proposed could in no way be said to result in the merging of Windlesham (Snows Ride) and Sunningdale.
- 3.13 In relation to Green Belt purpose 3 (*to assist in safeguarding the countryside from encroachment*), further consideration has been given to the nature of the setting of the site, the sensitivity of the site to landscape change, and the strength and permanence of the Green Belt boundary that would be created if development takes place. It remains our view that if the existing mature vegetation boundaries are retained, development is generally restricted to 2-storey height, and a new strong woodland Green Belt boundary is created, there will be little to no impact (in relation to Green Belt purpose 3) beyond the site's well contained boundaries. Furthermore, the provision of the significant SANG buffer along the northern, eastern and southern portions of the site (see Illustrative Masterplan at Appendix 1) creates a strong defensible rural boundary safeguarding further encroachment into the Green Belt. Accordingly, we adjudge land east of Snows Ride to make a low contribution to Green Belt purpose 3.
- 3.14 In combination with the evidence set out in the planning application, it is considered that there are necessary exceptional circumstances for the release of this site from the Green Belt for allocation in the emerging Local Plan, and subsequently, development. This would comprise a small-scale amendment to the Green Belt boundary along with the delivery of significant benefits for the existing local community, which are discussed in Section 5, below.
- 3.15 Integrated Retirement Communities (IRCs) have higher build costs, partly as a result of delivering supporting communal facilities. As such, developers of IRCs cannot be as competitive as standard residential developers in terms of land prices and therefore, in the absence of sufficient allocations through the development plan process, have frequently turned to bringing forward Green Belt sites with very special circumstances to justify their release. The 'blanket' approach by Surrey Heath BC to not allow any Green Belt releases for the delivery of much needed specialist accommodation for older people, affordable dwellings, and self-build dwellings, together with supporting open space and SANG, is considered to restrict the ability of the Local Plan to deliver the homes and infrastructure that the Borough's residents need across the Plan period.

4.0 Sustainability Appraisal

- 4.1 The opposition to the non-release of any Green Belt sites for older persons' or specialist residential development in the Reg 19 Local Plan is already established above, in Section 3.
- 4.2 The latest SA accompanying the Reg 19 Local Plan sets out 2 growth scenarios, having worked through various other scenarios as the plan has emerged. Growth Scenario 2 does include a single release of a site from the Green Belt, that being 'Fairoaks Garden Village'. No other releases are proposed for residential development in either Growth Scenario.
- 4.3 Ultimately the SA settles on Growth Scenario 1, which avoids a large single Green Belt release which would allocate a new Garden Village at Fairoaks (1,000 homes).
- 4.4 The Sustainability Appraisal published alongside the Reg 19 Local Plan also provides a summary of the considerations made specifically in relation to 'Site 809' (the site which is the subject of these representations), and its non-allocation in the Reg 19 LP.
- 4.5 Sites 276 and 809 are discussed on similar terms, due to their shared boundary and location adjoining the NE settlement boundary of Windlesham. The conclusions reached regarding these sites is extracted below (SA, para 5.4.104):

*'Sites 276 and 809 – are adjacent sites at the northeast extent of Windlesham, specifically at the eastern extent of the Snows Ride part of the settlement. **There is a degree of landscape containment**, Site 276 includes some PDL (an employment area) and **Site 809 benefits from access to the A30, such that there is connectivity to Bagshot Station to the west and Sunningdale station to the east (both within 2.5km; there is also a footpath along the A30, but not cycle path).***

*However, there is likely to be heritage and character sensitivity, given nearby Windlesham Court (albeit not nationally or locally listed) and associated large homes. The pre-WWI OS map shows Site 276 as a cricket pitch and Site 809 as within the grounds of Windlesham Court. **The promoter for Site 809 submitted a response to the consultation in 2022, suggesting the potential for 100 homes, but a preferable scheme might involve higher density housing alongside community infrastructure.** There would be a concern regarding urban sprawl along the A30, noting the recently permitted garden centre redevelopment scheme between Snows Ride and Broomhall; however, **there is a tree belt along the A30 that could provide screening and there are no public rights of way in the vicinity (indeed, there is only one public right of way linking to Snows Ride, potentially suggestive of a growth-related opportunity).**' [Pegasus emphasis added].*

- 4.6 The above discusses the site in broadly positive terms, suggesting that potential heritage and character concerns are overcome by strong landscape containment, and that the scheme has now progressed to demonstrate how an Integrated Retirement Community (in other words: higher density housing, in response to this analysis), together with community infrastructure and other affordable homes can be delivered on the subject site (see: live planning application 24/O428/OOU).

- 4.7 In addition to the above, we would again highlight the Green Belt Review Sustainability Assessment undertaken specifically for site 809. This has not been updated since the Regulation 18 consultation and therefore the findings have been erroneously carried forward to the Reg 19 Plan.
- 4.8 The Assessment helps develop an understanding of the sustainability credentials of areas of the Green Belt. The overall 'rating' for the land east of Snows Ride (site ref 809) remains 'Amber'.
- 4.9 However, an assessment of the criteria is undertaken below taking account of the proposed use of the land (per live application 24/O428/OOU), as specialised housing for older people and SANG.

GB Review SA Criteria	GB Review Land east of Snows Ride (site reference 809)	
Distance from bus stop		There are bus stops just north of the site, on the A30.
Frequency of bus service		There is more than one service per hour.
Distance from railway station		The railways stations at Bagshot and Sunningdale are 2.5km from the site, although Sunningdale station is a 5-minute direct bus journey.
Distance from schools		Not applicable to the Care Village proposal.
Distance from local retail services		Local convenience stores, public house, café, restaurant are all within 800m of the site, providing many of the services associated with a neighbourhood parade. These facilities will be supplemented by the facilities provided in the Care Village. The District Centre of Sunningdale is a 5-minute direct bus journey.
Distance from a doctors surgery		There is a private doctor's surgery in Snows Ride. Further, consulting rooms, providing a range of health services, will be provided within the Care Village.

Green Belt Sustainability Assessment Criteria (applied by Igloo Planning to site 809)

- 4.10 The above findings clearly illustrate how the sustainability 'score' of the site is high, with all criteria producing outcomes which would typically be expected to accompany a 'green' score, where the criterion is relevant to the proposed development.

5.0 Other Delivery Benefits

Affordable Housing

- 5.1 Part 3 of DRAFT Policy H6 confirms that sites of 10 or more self-contained specialist homes should deliver an *'appropriate proportion of affordable homes as evidenced by an independent viability assessment'*. At paragraph 6.36 of the viability assessment prepared in support of the local plan (Local Plan Viability Assessment, March 2024, Three Dragons), it is stated that *"Specialist older persons housing was not viable in either value area, on greenfield or brownfield land, even without affordable housing... We note that there have been recent retirement housing applications and developments in Surrey Heath suggesting that developers are able to make such adaptations and deliver viable schemes although these have been delivered without affordable housing, supporting our finding that affordable specialist older persons accommodation as part of a market development is not viable in the current financial climate."* Part 3 of Policy H6 should therefore be deleted as the Council's own evidence confirms that in the majority of cases affordable housing provision as part of specialist older persons housing schemes is not viable. This is further evidenced in the schedule provided at Appendix 4 which shows that Integrated Retirement Communities are typically unviable under the accepted terms of assessment.
- 5.2 Nevertheless, should the Planning Authority intend that this element of the policy remain, an upper limit figure, based upon clear evidence, should be provided to assist in instances where the provision of affordable housing may be viable.
- 5.3 Despite the acknowledged viability concerns around the ability to deliver affordable housing as part of specialist older persons housing schemes, the live planning application on Land at Snows Ride (24/O428/OOU) does so. A block providing up to 23 apartments will provide discounted market sale homes, under the First Homes initiative.
- 5.4 In regards of affordable housing need, the LHNA (2024) Table 6.8 details the estimated housing need and affordability by tenure.

Table 6.8 Estimated housing need and affordability by tenure

	Number in need	% unable to afford	Current need after affordability
Owner-occupied	621	3.1%	19
Affordable housing	379	69.7%	264
Private rented	708	31.1%	220
No housing (homeless/concealed)	629	100.0%	629
TOTAL	2,338	48.4%	1,133

Source: Derived from a range of sources

Table 6.8 (LHNA, 2024)

- 5.5 There is clearly a current and continued need for affordable housing in Surrey Heath, as well as a need for smaller homes for young people identified in the Windlesham Neighbourhood Plan. The delivery of affordable dwellings alongside specialist accommodation for older people on the subject site is a considerable benefit in the current planning application, but should not be a requirement of policy given the direct conflict with the evidence base underpinning the draft plan.

Self-Build Housing

- 5.6 DRAFT Policy H5 of the Reg 19 Plan sets out the ambition to deliver self-build housing as part of development proposals for 10 or more dwellings.
- 5.7 The current proposed development of Land at Snows Ride proposes approximately 10 self-build plots. This is against a current policy context which has no mechanism to secure self- and custom-build housing in the Borough, due to no existing policy to secure the delivery of this housing type in the adopted Local Plan.
- 5.8 The recent LHNA, 2024, confirms that there are currently 325 on 'Part 2' the Self and Custom Build register in Surrey Heath. Being prescribed to 'Part 2' of this register requires individuals to pay an annual fee to remain on the register, which further confirms their interest in this housing product.
- 5.9 Due to the lack of a policy instrument in the adopted Local Plan to deliver self- and custom-building housing, there is clearly unmet demand over previous years.
- 5.10 The delivery of self- and custom-building plots for offer to those on the register in Surrey Heath is clearly a significant benefit, and one which is being provided over and above current and proposed policy requirements. This element of the proposed development at Land at Snows Ride is an important delivery benefit.

SANG

- 5.11 The live planning application masterplan for the site includes sustainable alternative natural greenspace of approximately 8.6ha. This would be open to all members of the public as new recreation space to enjoy, of which there is a limited supply in the settlement of Windlesham currently.
- 5.12 The SANG will be designed in accordance with the Surrey Heath SANG SPD (2019) and Natural England guidance dated 2021. The circa 8.6ha SANG is far in excess of the 2ha minimum SANG size, meaning that it will be able to fulfil all other roles and criteria of a SANG.

GP Surgery

- 5.13 A GP Surgery is proposed on the subject site as part of the proposals in the live planning application. Land is reserved for this use and would be transferred to the GP surgery as part of any Legal Agreement accompanying a possible planning permission.

A letter of support from the Lightwater GP Surgery submitted as part of the planning application confirms that they would look to occupy the new GP surgery as expanding their current site, which is at capacity, is not feasible.

- 5.14 This is a significant benefit of the scheme in response to the current identified need for a GP Surgery in the Windlesham Area, identified in the Surrey Heath Infrastructure Needs Assessment 2017 at paragraph 4.3.6:

'The above analysis identifies that there is currently limited capacity within GP surgeries in Surrey Heath and so any population growth is likely to place considerable additional pressure on GP services.'

BNG

- 5.15 A development of the site as set out in the live planning application presents an opportunity to provide a significant BNG uplift, relative to the site's current baseline condition. As currently designed, the site would deliver in excess of 20% uplift in habitat BNG units.

Other Benefits

- 5.16 A raft of other benefits would be delivered through the allocation and development of Land at Snows Ride for development as proposed in the live planning application.
- 5.17 These include communal facilities including a café, restaurant, shop and leisure facilities which would be available for public use, economic benefits and new jobs associated with the construction and operation of the Integrated Retirement Community, and highways and footpath enhancements along Snows Ride to improve pedestrian and cycle connectivity.

6.0 Summary and Conclusions

- 6.1 These representations to the SHBC Regulation 19 Local Plan consultation are made on behalf of Retirement Villages Group. They should be read in conjunction with previous representations made on the emerging Local Plan, a vision document prepared and submitted via previous Local Plan consultation in July 2022, and in the context of a current live outline planning application on the site under the application reference 24/0428/OOU.
- 6.2 Objections are raised to the Regulation 19 Local Plan for the following reasons:
- 6.3 The Borough's current standard method housing need figure is 321 per annum, whilst the Government's proposed (currently out for consultation) LHN figure for the 658 per annum. This is an increase of 389 dwellings per annum, significantly beyond the DRAFT NPPF transitional arrangement allowance (-200 dwellings per annum) for advanced emerging Local Plans.
- 6.4 The Council are currently planning to meet their *current* LHN figure, ignoring the increased numbers expected to be adopted later this year. This shortfall needs to be met, and concern is raised at this stage that the plan would be both unsound, and not legally compliant with the emerging NPPF and standard method housing figures at the time of examination, regardless of any transitional arrangements that might be in place.
- 6.5 The Local Plan is failing to meet the very clear housing needs of the aging population in the Borough. The 3no. allocations in the Reg 19 plan for older persons accommodation make only a small contribution towards meeting the needs for specialist housing in the Surrey Heath Borough (124 homes), with the Council seeking to rely upon a 'permissive' Policy H6 to address the remaining local need. This does not create favourable conditions for the Borough to proactively respond to the identified need for older persons and specialist housing during the plan period.
- 6.6 Specialist Housing Providers require certainty and confidence in the delivery of sites to ensure that the unmet need for older person accommodation can be addressed during the plan period. Taking account of the existing 46-unit scheme at Bagshot, the Council has identified a current shortfall of 313 units for housing with care. The allocation of Land east of Snows Ride, Windlesham would provide an additional 154 specialist homes. This single allocation would meet nearly 50% of the identified shortfall to help address the current deficiency in the provision for housing with care.
- 6.7 The Council need to be more positive and proactive to ensure that these needs are met, by allocating more sites specifically to meet the need for housing with care. This should include the release of sites from the Green Belt, where appropriate.
- 6.8 The Council have taken a 'one size fits all' approach to releasing sites from the Green Belt for residential development, including for specialist older persons accommodation. In short, no sites are being released from the Green Belt for this purpose.
- 6.9 The requirement in policy H6 that specialist housing for older people should make an

affordable housing contribution is completely unsupported by the viability evidence available to the Planning Authority. It is unreasonable and will diminish further the delivery of a form of housing for which there is significant need.

- 6.10 With specific consideration to the merits of our client's site at Land east of Snows Ride, we consider that the site represents a unique opportunity to deliver an Integrated Retirement Community (of which there is currently an unmet need), much-needed affordable and self-build homes, and a range of other community benefits including land for a GP, SANG, ecological and highways improvements.
- 6.11 The NPPF is clear that Local Plans will have to meet the tests of soundness as set out in paragraph 35 (36 in DRAFT July 2024 NPPF) in order to be adopted. These include being *a) Positively Prepared – preparing a strategy which as a minimum seeks to meet the areas objectively assessed needs* and *d) Consistent with national policy*. As evidenced above, the Surrey Heath Regulation 19 plan in its current iteration does not meet these tests, as set out further within the table at Appendix 2 and within the representation forms submitted in response to this consultation.
- 6.12 We therefore recommend that Land east of Snows Ride, Windlesham should be allocated for development to provide an Integrated Retirement Community, with associated supporting development and Suitable Alternative Natural Greenspace in the Council's Submission Local Plan and the Policies Map amended accordingly.

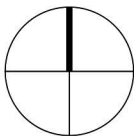


Appendix 1 – Illustrative Masterplan submitted in support of planning application ref.
24/O428/OOU.



KEY

- Site Boundary
- Retained Tree
- Vegetation to be removed
- 1 Woodland and Parkland Landscape Buffers along Snow's Ride and London Road. Pedestrian footpath to be located within parkland along Snow's Ride
- 2 Suitable Alternative Natural Greenspace (SANG) comprising species rich grassland, attenuation basin, walks and incidental and natural play trails
- 3 Wooded edge of SANG along eastern and south-eastern boundary
- 4 Sensitively designed edge between SANG and development to create a sense of tranquillity balanced with natural surveillance and permeability in line with Natural England requirements
- 5 Approach into scheme from London Road, meadow triangle with signage welcoming visitors and wayfinding for pedestrians, with views to the SANG
- 6 Green Fingers to comprise pocket orchards, foraging and berry walks, nature trail and nut coppices, spaces for the community to gather, bug hotels, swales and rain gardens, with pedestrian connections to the SANG
- 7 Leafy streets including shared space zones, setting a clear road hierarchy and create a verdant appearance and support wayfinding through the scheme
- 8 Orchard Walks and community pocket orchards for communal fruit growing and harvesting with potential for apiaries
- 9 Kitchen Gardens / Allotments: welcoming spaces for residents to grow food and develop a sense of community. Raised beds, potting sheds and potential for apiaries
- 10 Residential courtyard: neighbours meeting and Socialising spaces
- 11 Clubhouse Square: a visually welcoming space with visitor drop-off, set within a framework of cherry blossom trees
- 12 Formal Green: a visually open formal lawn space to play croquet and for outdoor events
- 13 Formal gardens to the Clubhouse with terraces for sundowners
- 14 Network of informal paths into and around SANG for Peaceful recreation
- 15 Play and Agility trails and play spaces along walks with a larger play space near the Club House for residents to enjoy with their visiting grandchildren.
- 16 Potential zone for petanque games
- 17 Water attenuation basin within SANG
- 18 Proposed GP Surgery location
- 19 Potential resting point to include a bench and opportunities for watching wildlife



0m 25m 50m 75m 100m

Rev	Date	Description
1	14/03/2024	For Planning
2	03/04/2024	For Planning
3	05/04/2024	For Planning

Dwn	Ckd
MG	ET
MG	ET
MG	ET

Drawn	MG
Checked	ET
Date	APR' 2024
Scale	@ A1 1 : 1250

Windlesham
Illustrative Landscape
Masterplan

WNS-EDL-ZZ-XX-DR-L-0100
P3



Appendix 2 – Response to Proposed Surrey Heath Local Plan (2019–2038): (Regulation 19) Policies

Proposed Draft Policy.	Tests of Soundness.	Suggested Modifications.
SS1 – Spatial Strategy	<p>Paragraph 35a of the NPPF requires Local Plans to be positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs.</p> <p>The Borough’s current standard method housing need figure is 321 per annum, whilst the Government’s proposed LHN figure is 658 per annum. This is an increase of 389 dwellings per annum, significantly beyond the DRAFT NPPF transitional arrangement allowance (–200 dwellings per annum) for advanced emerging Local Plans. This shortfall needs to be met. In its current form, the Plan is therefore not positively prepared or justified.</p> <p>Furthermore, this shortfall must be met otherwise the Local Plan would not be found sound against the fourth test of soundness as listed in part d of paragraph 35, which requires local plans to be consistent with national policy.</p>	<p>The Council need to be more positive and proactive to ensure that these needs are met, by allocating more sites specifically to meet the need for housing with care. This should include the release of sites from the Green Belt, where appropriate.</p>
HA1 – Housing Allocations	<p>Under policy HA1, just three sites are allocated for extra care or residential care uses. In total, these 3 sites are expected to deliver (per their allocation and associated policy text) just 124 extra care or residential care units across the plan period to 2038.</p> <p>The Borough has a considerable and growing elderly population, coupled with an identified current need for extra and residential care. This need</p>	<p>Taking account of the existing 46–unit scheme at Bagshot, the Council has identified a current shortfall of 313 units for housing with care. The allocation of Land east of Snows Ride, Windlesham would provide an additional 154 specialist homes. This single allocation would meet nearly 50% of the identified shortfall to help address the current deficiency in the provision for housing with care.</p> <p>Land at Snows Ride should be allocated for the provision of specialist older persons</p>

	is not being responded to by the small number of allocations (just 124 units) in the Local Plan for this specialist housing type and is therefore not positively prepared, justified or consistent with national policy.	accommodation and the Policies Map updated accordingly to include the allocation and amend the Green Belt boundary to remove the site from the Green Belt.
H5 – Range and Mix of Housing	<p>This Policy is supported. There is currently no local policy context with which to secure self- and custom-build housing in the Borough. Due to the lack of a policy instrument in the adopted Local Plan to deliver self- and custom-building housing, there is clearly unmet demand over previous years.</p> <p>This Policy ensures the new local plan would be consistent with national policy.</p>	The delivery of self- and custom-building plots for offer to those on the register in Surrey Heath is clearly a significant benefit, and one which is being provided over and above current and proposed policy requirements. This element of the proposed development at Land at Snows Ride is an important delivery benefit and provides yet further justification for the allocation of Land east of Snows Ride, Windlesham under Policy HA1.
H6 – Specialist Housing	<p>Generally supportive of this policy. However, Part 3 of the policy states that sites of 10 or more self-contained specialist homes should deliver an <i>‘appropriate proportion of affordable homes as evidenced by an independent viability assessment’</i>. This is contrary to the Council’s own evidence which confirms (at paragraph 6.36 of the Local Plan Viability Assessment, March 2024, Three Dragons), that <i>“Specialist older persons housing was not viable in either value area, on greenfield or brownfield land, even without affordable housing.”</i> As such, it is not based upon proportionate evidence and is therefore not justified.</p>	<p>Part 3 of the policy should be deleted.</p> <p>In the event that this part of the policy remains, an upper limit affordable housing figure that applies specifically to Specialist Housing should be added. This maximum threshold should be based on robust viability assessment of Specialist Housing.</p> <p>Further sites, including Land east of Snows Ride, Windlesham, should be allocated for this type of development, alongside the 3 proposed at HA1/26–28. In the absence of allocations that deliver the required quantum of specialist homes for older people, the LP is unsound.</p> <p>These additional allocations could be provided either through the specific H6 Specialist Housing policy itself or through Policy HA1 Housing Allocations.</p>
Proposed Allocation	The addition of Policy HA1/29 – Land east of Snows Ride, Windlesham,	Propose amending Policy HA1 – Housing Allocations, to include the allocation of



Policy HA1/29	would ensure the plan is positively prepared, justified and consistent with national policy.	Land east of Snows Ride, Windlesham (HA1/29). The addition of this single allocation would meet nearly 50% of the identified shortfall to help address the current deficiency in the provision for housing with care.
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Appendix 3 – Previous representations to the Surrey Heath emerging Local Plan Reg 18 made in respect of Land at Snows Ride. – submitted in separate files.



Appendix 4 – FVA Outcomes.

Typology	Existing site use	Number of homes	Affordable housing outcome		
Retirement living	Hotel	24	Nil affordable viable		1.
Retirement living	Offices	54	Nil affordable viable		2.
AL/extra care	Cleared former office site with consent for office redevelopment	100	Nil affordable viable		3.
AL/extra care	Offices	65	Nil affordable viable		4.
Retirement living	Car workshop	38	Nil affordable viable		5.
IRC	Council offices	113	Nil affordable viable		6.
Retirement living	Bus depot	89	Nil affordable viable		7.
Retirement living	Offices	31	Nil affordable viable		8.
AL/extra care	Industrial	58	£100,000		9.
AL/extra care	Student hostel	60	Nil affordable viable		10.
Retirement living	Hostel	42	Nil affordable viable		11.
Retirement living	Mixed commercial	80	£477,550		12.
Retirement living	School	63	£180,000		13.
IRC	Agricultural farmland	133	????		14.
IRC (alongside commercial and other housing)	Manufacturing	150 (plus 190 other housing)	Nil affordable viable		15.
IRC	Nursery/garden centre	124	Nil affordable viable		16.
IRC	Cleared urban site, previously cinema, retail etc	166	Nil affordable viable		17.
IRC	Horse paddocks	160	Nil affordable viable		18.
IRC	Garden centre	125	Nil affordable viable		19.
IRC (alongside other housing)	Agricultural farmland	125	Nil affordable viable		20.

IRC	Greenfield used for keeping of horses	141	Nil affordable viable, £1m sum offered on <i>ex gratia</i> basis		21.
IRC	Greenfield	144	Nil affordable viable		22.
IRC and care home	Infilled former quarry	164	£2,500,000		23.
		2,409	£4,257,550 (<2% affordable housing)		

LAND EAST OF SNOWS RIDE
WINDLESHAM, SURREY HEATH

VISION DOCUMENT

MAY 2022





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INTRODUCTION



INTRODUCTION

STATUS

This Vision Document has been prepared on behalf of The Wooldridge Group, who have an interest in the land to the east of Snows Ride, Windlesham.

The proposals presented within this document are intended to stimulate and inform debate around the opportunity to create a new community green space for the residents of Snows Ride, alongside a high quality care village to help meet the local need for housing with care.

It is expected that the plans will evolve, as the views of the Council, local community and other key stakeholders are taken on board, and as further technical work is completed.

THE WOOLDRIDGE GROUP

The Wooldridge Group are a locally based award winning developer. They seek to create beautiful places, with a particular emphasis on ensuring that their schemes reflect - and contribute towards - local community needs.

The Wooldridge Group are committed to engaging with the local community and other key stakeholders as the scheme progresses through the planning process.

PURPOSE AND SCOPE

The purpose of this Vision Document is to demonstrate how some of the key challenges identified in the emerging Surrey Heath Local Plan (and Windlesham Neighbourhood Plan) can be addressed through proposed development of the land to the east of Snows Ride, Windlesham.

The Vision Document is informed by preliminary technical work in relation to highways and accessibility, landscape, trees and Green Belt matters, drainage, and flood risk. It is also informed by evidence in relation to the significant need for more housing with care, to meet the needs of an ageing local population.

The detailed design of the proposed care village and green space is for a later stage in the planning process, but The Wooldridge Group are committed to the delivery of an exemplar scheme, both in terms of design quality, and environmental sustainability.

THE TEAM



DOCUMENT STRUCTURE



INTRODUCTION

Provides information regarding the status, purpose and scope of the document. Introduces the Wooldridge Group and the consultant team.



THE CHALLENGE

Reviews the challenges facing Surrey Heath – including in relation to addressing the housing needs of an ageing population, the limited scope to deliver new strategic community infrastructure in smaller villages, specifically in the east of the Borough (including at Windlesham), and the importance of protecting the Thames Basin Heaths Special Protection Area (TBHSPA).



THE OPPORTUNITY

This section addresses the merits of land east of Snows Ride, as a sustainable location for accommodating a care village and new community green space. It describes the site and its surroundings, including the accessibility of the site in relation to the existing local facilities and services, and to the nearby train stations at Sunningdale and Bagshot. The findings of the completed technical assessments are briefly summarised, culminating in an overview of the opportunities and constraints that have influenced the proposals for the site.



THE VISION

Presents an emerging vision for the land east of Snows Ride. The development objectives are defined, before presenting an initial concept masterplan.



SUMMARY

Provides a summary of the proposals.





THE CHALLENGE



THE CHALLENGE

As in most local authority areas, Surrey Heath faces a range of challenging planning issues. There are concerns around the affordability of local housing, and there is a need to plan for an ageing population. A comprehensive approach is required towards protection of the Thames Basin Heaths Special Protection Area, and more generally, opportunities taken to enhance local biodiversity, and improve access to local green spaces.

The Surrey Heath Local Plan review provides an opportunity to tackle these challenges (and others), through a positive and coherent planning strategy, with related supporting land use allocations.

SURREY HEATH BOROUGH PLANNING STRATEGY

Core Strategy and Development Management Policies Document

The Surrey Heath Core Strategy and Development Management Policies Document was adopted in 2012. It was prepared in a different planning policy context to the now emerging Local Plan, with the South East Plan (Regional Spatial Strategy) setting the housing target for the Borough in the period to 2026. Many of the challenges facing the Borough at the time of preparing the Core Strategy nonetheless remain highly pertinent today.

The “Key Challenges” listed in the Core Strategy (section 3) include:

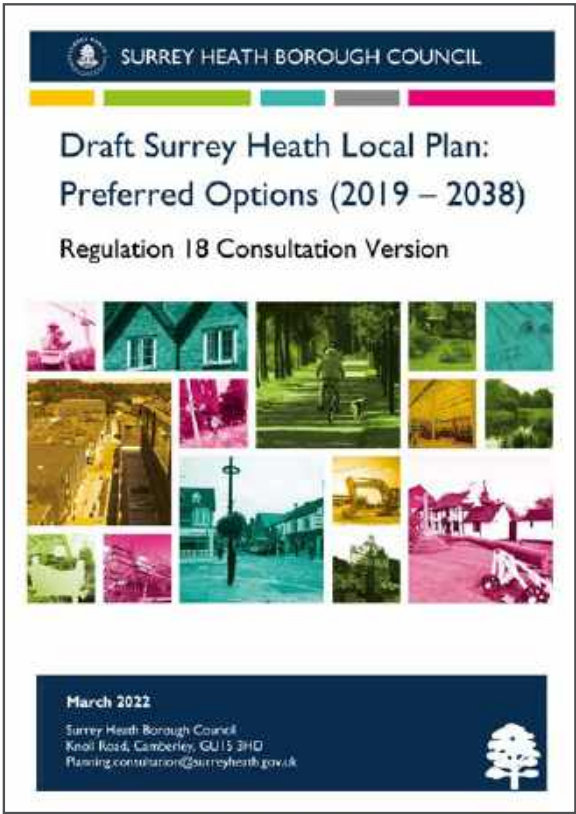
- Protecting biodiversity, including through the provision of new or improved green spaces.
- The high cost of housing and cost of living, meaning that affording a place to live is a problem even for those on average incomes.
- The ageing population, including in terms of housing, health, employment and social support.
- The high levels of car ownership and the poor public transport accessibility across much of the Borough.
- The need to address climate change issues, including by making better use of resources.

Emerging Surrey Heath Local Plan

The Draft Surrey Heath Local Plan (March 2022) also includes a section outlining the key challenges in the Borough. There is significant overlap with the challenges identified in the 2012 Core Strategy:

- How to deliver the additional development and infrastructure that will support and benefit the changing population, without compromising the quality of life of existing residents or cause harm to the environment.
- How to ensure that new development is supported by the necessary physical, social and community infrastructure.
- How to deliver an appropriate mix of housing, ensuring the availability of affordable housing, as well as meeting the needs of an ageing population.

- How to ensure that development within the Green Belt does not have a detrimental impact on the openness and purposes of the Green Belt.
- How to ensure that new development is designed and located to minimise its impact on the environment, and that it mitigates, and is adapted for, climate change.
- How to ensure that the character of towns and villages in the Borough is protected, whilst allowing the necessary development to take place.



THE CHALLENGE

Windlesham Neighbourhood Plan

The Windlesham Neighbourhood Plan 2018-2028 was 'made' in 2019, following a comprehensive engagement process with local residents.

In relation to proposals for new dwellings, the Neighbourhood Plan notes that an analysis of the population and housing stock profiles has indicated an ageing population, with individuals either reluctant or unable to downsize. To help address these issues, the Neighbourhood Plan promotes smaller dwellings, including retirement and assisted living units.

In relation to community facilities, the Neighbourhood Plan references the National Planning Policy Framework (NPPF), in terms of the encouragement given to positively enhancing the beneficial use of Green Belt land – including looking for opportunities to provide access, deliver new recreation opportunities, and enhance biodiversity.



MAIN AREAS OF EXISTING "URBAN" GREEN SPACE WITHIN THE SNOWS RIDE AREA OF WINDLESHAM

THE CHALLENGE

Addressing three of the key challenges, or themes, in turn:

Housing Needs and the Ageing Population

The Local Housing Needs Assessment (LHNA) (GL Hearn, 2020), which forms part of the evidence base for the emerging Local Plan, confirms that there is a significant need for more affordable housing in the Borough. The delivery of more affordable housing is important for a range reasons, including in terms of ensuring that there is accommodation for local key workers.

The LHNA also addresses the issue of the ageing population in Surrey Heath. By 2040, older persons age groups are forecast to experience the most significant proportional growth, with ages 70-74 increasing by 27.6%, ages 75-79 increasing by 53.9%, ages 80-84 increasing by 59.5% and 85 years and over increasing by 107.9%. The LHNA confirms that:

“given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward.”

The LHNA identifies a deficit of some 1,284 units of specialist housing (i.e. housing with support, enhanced sheltered accommodation, and extra care housing) by 2040. The majority of the provision to meet this need should be for housing with support/care.

GL Hearn recommend that the Council should consider how best to deliver the identified specialist housing need, with one suggested option being to identify sites in accessible locations for specialist housing.

Work commissioned by The Wooldridge Group supports the findings and recommendations set out in the LHNA. A Headline Need Statement for Housing with Care, prepared by Carterwood (March 2022), considers existing local provision, and the pipeline of new local provision, and concludes that there will be a shortfall of nearly 450 private housing with care units in the Borough by 2037.

Whilst draft Policy H6 in the emerging Local Plan (March 2022) provides a permissive policy for the delivery of specialist housing, this is felt unlikely to meet the evidenced needs. The Wooldridge Group believe that the Council should take forward GL Hearn’s LHNA recommendation, and adopt a more proactive approach to ensuring that the housing needs of the ageing population are met, by allocating sites specifically to meet the need for housing with support/care.

Community Facilities, including Access to Recreation Land

The emerging Local Plan recognises the importance of access to green open spaces, to encourage healthy lifestyles. Residents of the Snows Ride area of Windlesham have limited access to local green space, and indeed, there are few public rights of way in the immediate vicinity.

The Council’s Interim Sustainability Appraisal specifically recognises the growth related opportunity in the Snows Ride area, with scope to deliver new strategic green space to benefit the existing community.

Protecting and Enhancing Biodiversity

The Thames Basin Heaths Special Protection Area (TBHSPA) covers 23% of the Borough. It is a site of international importance, supporting vulnerable ground nesting birds.

Natural England have advised that new housing within 5km of the SPA may harm the rare bird populations, as a result of more walkers, cats and dogs frequenting the heathland.

In order to allow new development while safeguarding the integrity of the Thames Basin Heath SPA , the Council has put in place mitigation measures, which include the need for provision of Suitable Alternative Natural Greenspace (SANG). A number of new or improved areas of open space have already been provided in Surrey Heath, and further areas will need to be provided to help mitigate the impact of future development.

As well as protecting the biodiversity interest within the Thames Basin Heath SPA , opportunities should be taken to enhance biodiversity in other parts of the Borough, in keeping with the emerging Local Plan vision, that overall, a net gain in biodiversity should be achieved across the Borough in the Plan period.



THE OPPORTUNITY



INTRODUCTION

The land east of Snows Ride offers a significant opportunity to help address some of the key Local Plan challenges, in terms of helping to meet the housing needs of the ageing population, enhancing local biodiversity and in terms of delivering a strategic area of recreation space for existing and new residents.

The locational advantages of the land east of Snows Ride are set out below, in terms of wider accessibility to the larger settlements of Bagshot and Sunningdale. The site is then described, including in relation to the nearby existing local amenities, before the summary findings of the preliminary technical work are presented.



LAND EAST OF SNOWS RIDE WINDLESHAM

CONNECTIVITY

The land east of Snows Ride is well connected. It sits adjacent to the A30, with good access to bus services (which serve Bagshot railway station to the west, and Sunningdale railway station to the east).

BUS TRAVEL

The nearest bus stops to the site are located on London Road, close to the northern boundary of the site. A new pedestrian link can be provided within the site to connect to these stops.

London Road is served by the 500 bus service that runs between Frimley Park Hospital, via Bagshot, Windlesham, Sunningdale and Staines. The service runs along London Road in both directions throughout the week and on a Saturday from around 7am to around 6pm.

A range of local destinations can easily be reached via a direct bus from adjacent to the site.

Camberley Rail Stn / Pembroke Bdy, stop C			0737	0747	1040	1340	1515	1630	1735	1010	1230
Bagshot Square			0745	0755	1047	1347	1522	1637	1742	1017	1237
Lightwater War Memorial	0650	0720	0757	0805	1052	1352	1527	1643	1747		
Lightwater Ambleside Road (Rydal Place)					1055	1355	1529				
Lightwater Briar Avenue (Osborne Drive)					1057	1357	1532				
Lightwater Road Colville Gardens					1059	1359	1534				
Windlesham Post Office	0655	0725	0802	0810	1107	1407	1542	1648	1752	1024	1244
Windlesham Bee	0658	0728	0805	0813	1110	1410	1545	1651	1755	1027	1247
Charters School			0815								
Sunningdale Rail Stn, London Road			0820	0820	1115	1415	1550	1656		1031	1251
Sunningdale Rail Stn, Forecourt	0705	0735							1800		

ROUTE 500 BUS TIMETABLE EXTRACT

Importantly, Sunningdale railway station is only a 5 minute bus journey from the site. In addition, the Waitrose supermarket in Sunningdale and Frimley Park Hospital are 5 and 40 minute bus journeys respectively. Camberley Town Centre is only a 28 minute bus journey away.

The site, and a range of local destinations, are accessible by bus.

DESTINATION	DURATION
SUNNINGDALE RAILWAY STATION	5 MINUTES
WAITROSE SUNNINGDALE	5 MINUTES
FRIMLEY PARK HOSPITAL	40 MINUTES
CAMBERLEY TOWN CENTRE	28-30 MINUTES

RAIL TRAVEL

As detailed above, Sunningdale railway station is only a 5 minute bus journey from the site. Sunningdale provides up to 3 trains per hour towards London between 7am and 8pm and the journey takes approximately 55 minutes.

Bagshot railway station is also only 2.5km from the site, offering services to a range of destinations including Ascot, Guildford and Farnham. Camberley, the nearest main town is only 5 minutes by train from Bagshot station.

The railway stations at Sunningdale and Bagshot, connected by the 500 bus, afford the opportunity to travel to and from the site to a range of destinations, for all types of journey purposes.

SUMMARY

A convenient and frequent bus service provides connectivity to a range of local destinations, including the railway station, retail and other facilities in Sunningdale. The available public transport services offer a realistic alternative to private car use, for residents, staff and visitors of any future development on land east of Snows Ride.

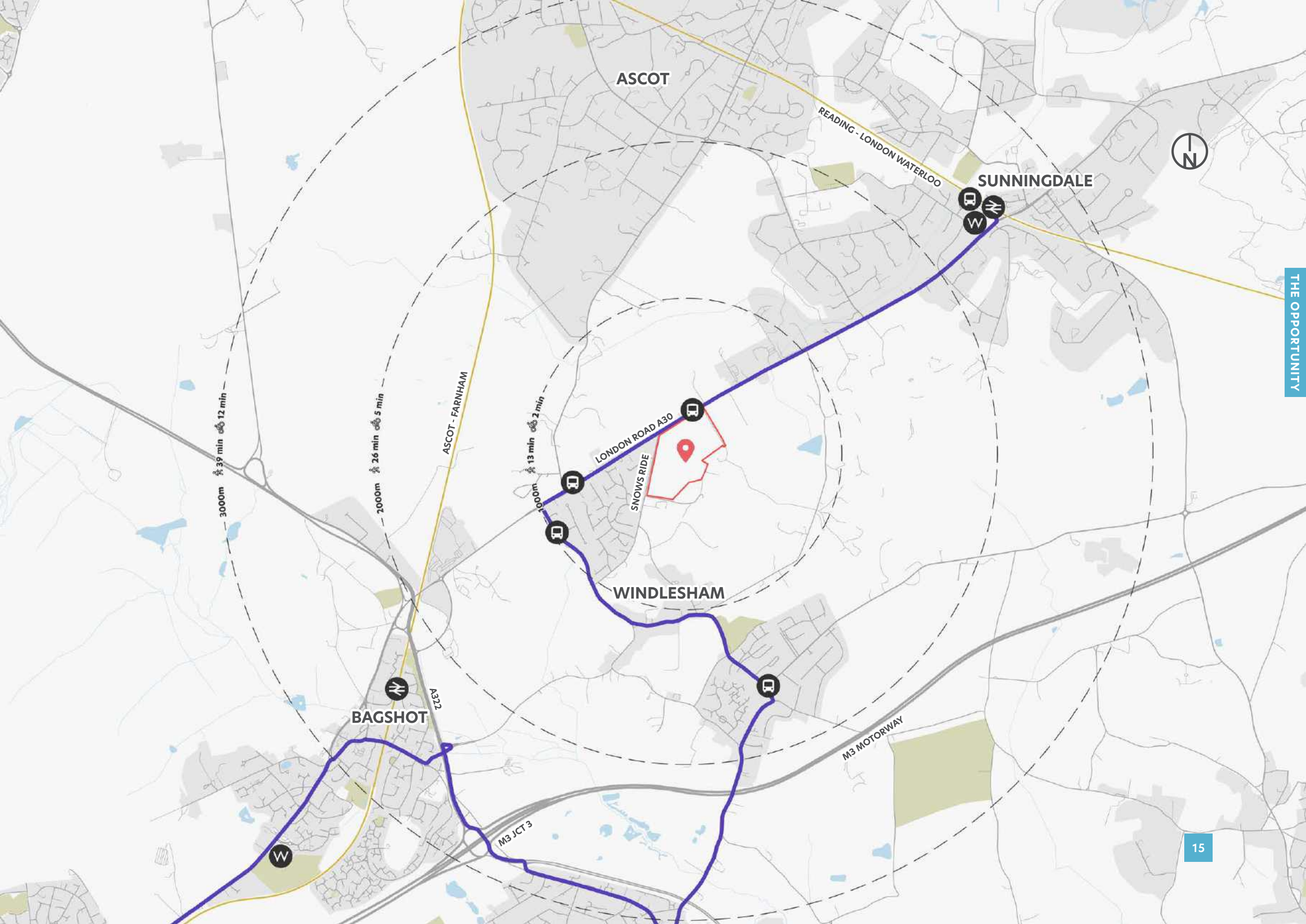
LEGEND

BUS ROUTE (ROUTE 500)

BUS STOPS (ROUTE 500)

RAILWAY STATIONS

WAITROSE SUPERMARKETS



THE SITE

The site is located to the east of Snows Ride and south of London Road A30. It comprises paddock land of c.16 Ha and is currently grazed by horses.

Topography on site is gently undulating, with a small rise from the northern edge (c.66-67m AOD) to the centre of the site (c.68-72.5m AOD), and a gentle fall towards the southwestern corner (c.62.5m AOD).

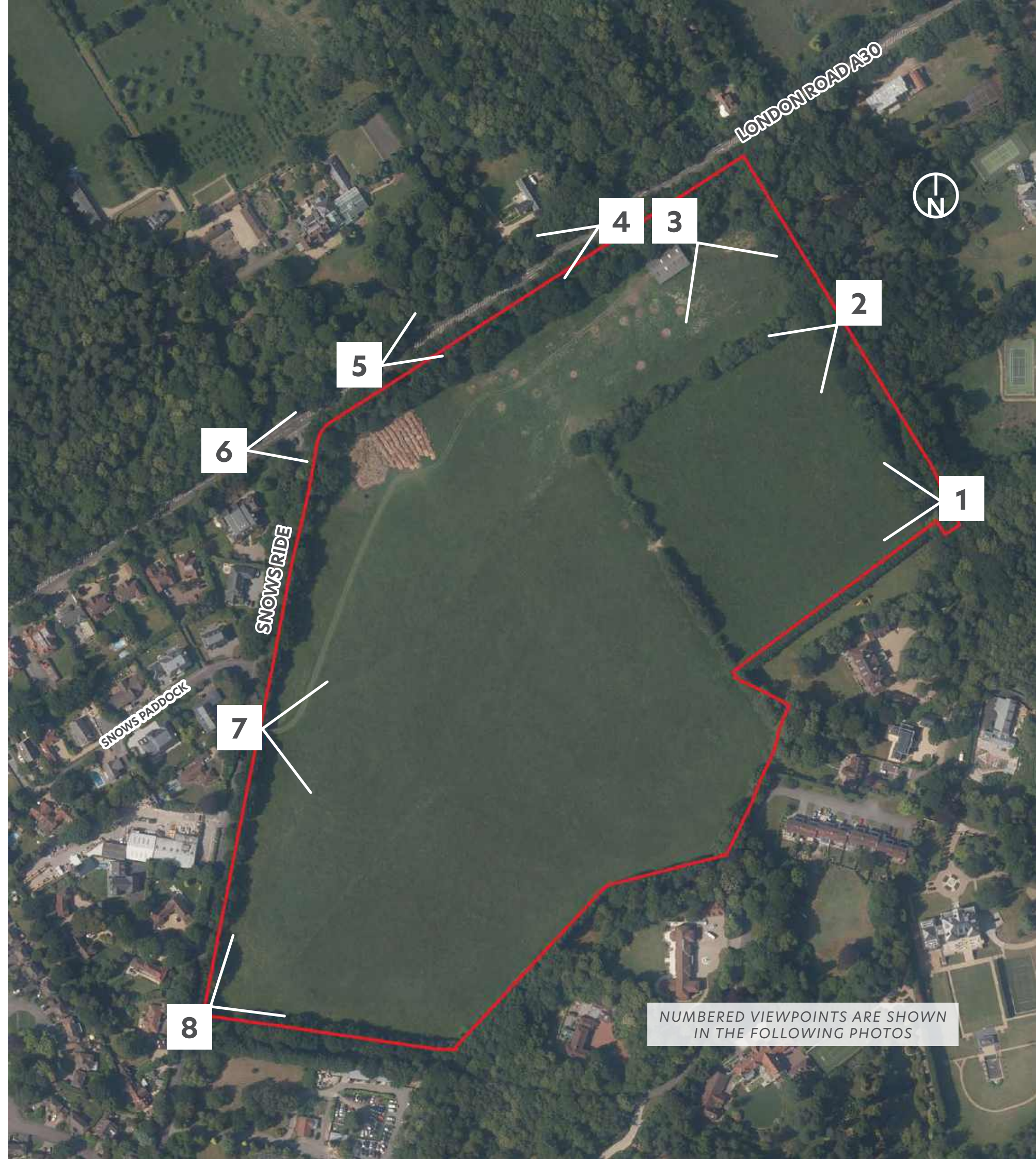
An existing barn is located in the northern corner of the site, and no other permanent structures are present.

The northern edge of the site is defined by the A30 and dense, established mature vegetation around 20m in depth. The northern boundary is delineated by a private vehicular access to Windlesham Court lined by mature single trees and scrub. A row of established, well maintained trees forms the northeastern boundary, shared with Park Place. The remainder of the eastern boundary comprises tall, established trees with dense undergrowth. A private, gated vehicular access defines the southern and southeastern boundary, providing access to Windlesham Court. Snows Ride and a drainage ditch delineates the western boundary, which has single tree planting and a barred gate providing agricultural vehicle access half way along Snows Ride.

There is a square field in the northeast of the site. This is defined by drainage ditches and mature trees.

Pavements provide for pedestrian access along London Road, but Snows Ride does not currently have a formal pedestrian access route

The site has strong visual enclosure on all sides as a result of the surrounding existing mature vegetation.



NUMBERED VIEWPOINTS ARE SHOWN
IN THE FOLLOWING PHOTOS

SITE PHOTOS



VIEW WEST INTO NATURALLY ENCLOSED “SQUARE” FIELD FROM NORTHEASTERN CORNER



VIEW SOUTHWEST INTO ENCLOSED “SQUARE” FIELD FROM THE FAR EASTERN BOUNDARY

SITE PHOTOS



3

VIEW SOUTHEAST TOWARDS "SQUARE" FIELD FROM NORTHERN BOUNDARY EAST OF THE EXISTING BARN



4

VIEW SOUTHWEST ALONG A30 LONDON ROAD



5

VIEW NORTHEAST ALONG A30 LONDON ROAD



6

JUNCTION OF A30 LONDON ROAD & SNOWS RIDE

SITE PHOTOS



PANORAMIC VIEW OF THE SITE FROM SNOWS RIDE TOWARDS THE NORTH AND EAST



PANORAMIC VIEW FROM SOUTHWEST CORNER ON SNOWS RIDE TOWARDS THE NORTHEAST

LOCAL AMENITIES

Windlesham is a village dispersed over three main areas; the historic elements of the village in the south, dwellings along rural lanes in the centre, and a collection of mid-late 20th century housing in the north.

The site is located to the east of the northern part of Windlesham, to the east of Snows Ride.

Many day-to-day services are available within the immediate local area, including convenience stores, garden centres (with cafes, restaurants and shops), public houses, and a GP surgery in close proximity.

The nearest larger area for recreation is the Field of Remembrance. Although a beautiful facility, it is some distance from the site with no continuous footway linking the two.











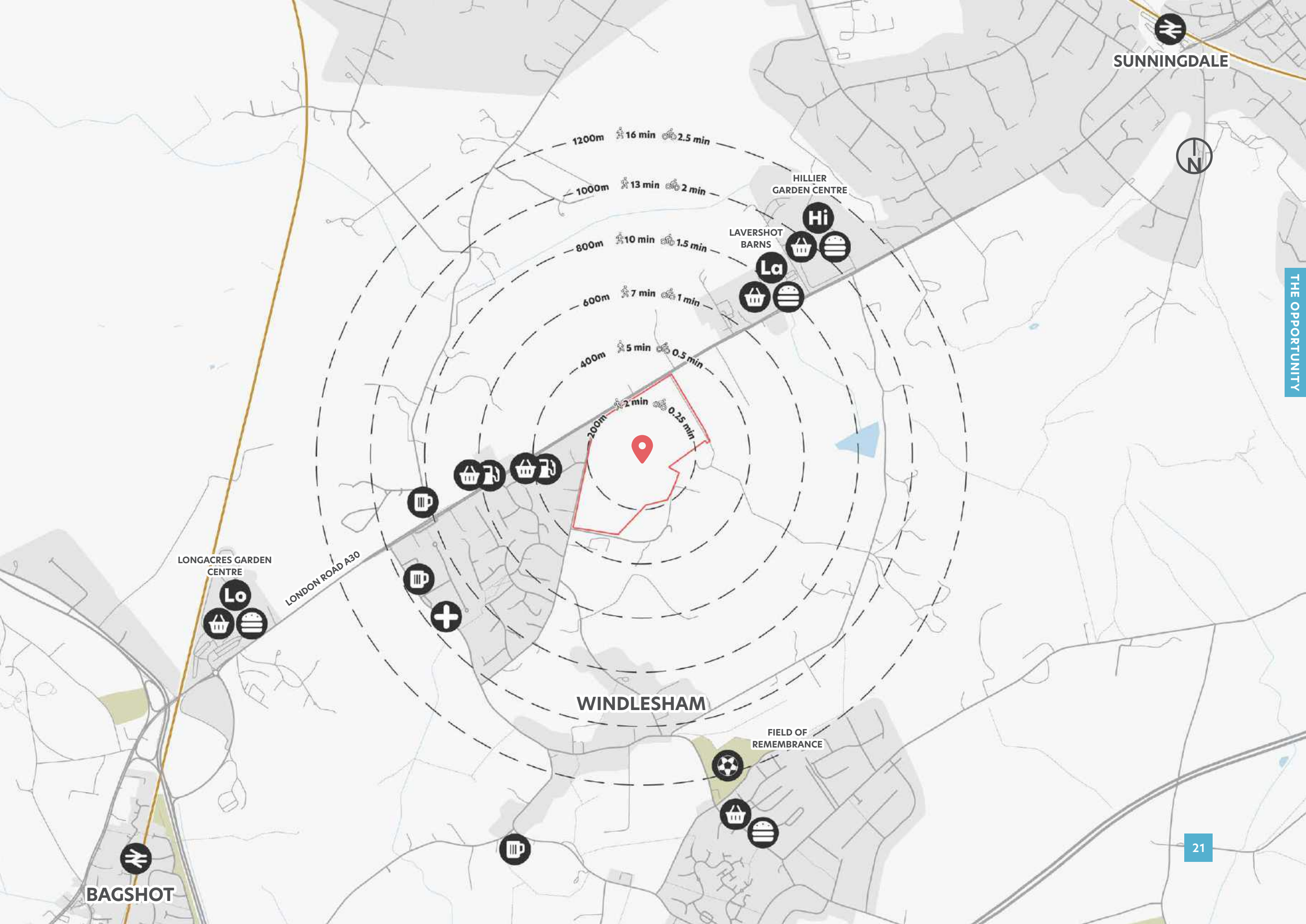
 THE WINDMILL PUB



   LAVERSHOT BARNS - INCL SHOPS, RESTAURANT

NEAREST

	CONVENIENCE STORE (ESSO MFG)	350m
	PETROL STATION (ESSO MFG)	350m
	LAVERSHOT BARNS (SHOPS, CAFE)	500m
	PUB (THE WINDMILL)	750m
	GP SURGERY (PARK HEALTH CLINICS)	880m
	RECREATION (FIELD OF REMEMBRANCE)	1.1km
	LONGACRES GARDEN CENTRE (SHOPS, CAFE)	1.7km
	RAILWAY STATION (BAGSHOT)	2.3km



TECHNICAL ASSESSMENT

To fully understand the potential of the land east of Snows Ride, and to inform the proposals, a number of technical assessments have been undertaken, with headline findings presented below:

ECOLOGY

The site does not support any statutory or non-statutory ecological designations, but is within 2km of three statutory designated sites (including the Thames Basin Heaths SPA), and three non-statutory designated sites (including Sunningdale Golf Course SNCI, and Sunningdale Ladies Golf Course SNCI). There are also two ancient woodlands within 2km of the Site.

Description

The site itself is dominated by permanent pasture, grazed by horses. There are two fields separated by ditches lined by trees, which slope gently downhill from the northern end of the site to the south west corner. In this corner the ground is much softer under foot. The fields support poor semi-improved grassland with a variety of grass species, with a limited diversity of forbs.

The ditch marking the boundary between the large and small fields holds water in small pools. The pool at the northern end of the ditch appears to hold water for much of the year and supports flote grass, which is indicative of permanent or prolonged waterlogging.

Along the northern boundary and the northern end of Snows Ride (on the western boundary) there is a mixed plantation woodland supporting a variety of deciduous and coniferous trees including mature specimens. The understory is open and readily accessible but is dominated by non-native invasive species including laurel, rhododendron, and bamboo. The hedgerow along Snows Ride is dominated by a line of trees.

Protected Species and Species of Conservation Concern

The site has potential to be used by protected species and species of conservation concern. In summary:

The existing woodland and boundary trees support potential roosting features for bats. The open grassland, hedges and woodland are all likely to be used for foraging by bats, however the woodland and hedgerows are likely to be of higher value for bats than the species-poor semi-improved grassland sward. The retention of the existing woodland and hedgerows, combined with the proposed new woodland, scrub, grassland and wetland is considered likely to result in improved foraging habitat.

There are no records of dormouse within 2 km of the site. However, the site does support woodland and hedgerow habitat that is well connected with the wider landscape. As such the site has potential to support dormouse. However, the woodland and hedgerow habitat will be retained and enhanced, and new habitat in the form of woodland and scrub can be created as part of any future SANG. As such, if present, the proposed development is likely to result in a net gain in suitable habitat (and an improvement in habitat quality) for dormouse.

There is limited suitable habitat for common species of reptile, although grass snake could be associated with the wet ditches, hedgerow and woodland edge, and slow worm and common lizard may occur along hedgerow and woodland edge habitat.

There are two ponds on the boundary with the site, and at least five other ponds within 500 metres that could support great crested newts. On site the flooded ditch on the northern boundary has the potential to support newts, if it retains water long enough into the summer.

The proposed SANG can support new oak birch woodland, wetland, scrub and grassland, and is considered likely to provide improved habitat for common reptile species and great crested newts.

ARBORICULTURE

The trees at the site are located at the site boundaries and have landscape value as site screening. There is ample scope on this site to allow development, whilst retaining the tree groups present, and also ensuring there is a sustainable relationship with retained trees and the proposed development.

More detailed survey information taken for the trees adjacent to Snows Ride indicates that there is scope to provide an access into the site from that road. There are several locations on the boundary where there are low quality C category trees that could be removed to allow for an access. In these locations there are gaps between the Root Protection Areas (RPAs) of B category trees where an access could be provided without causing adverse impact.

Most of the area within the site is devoid of trees, and therefore there is the opportunity for significant tree planting as part of any proposed development.

TECHNICAL ASSESSMENT

LANDSCAPE

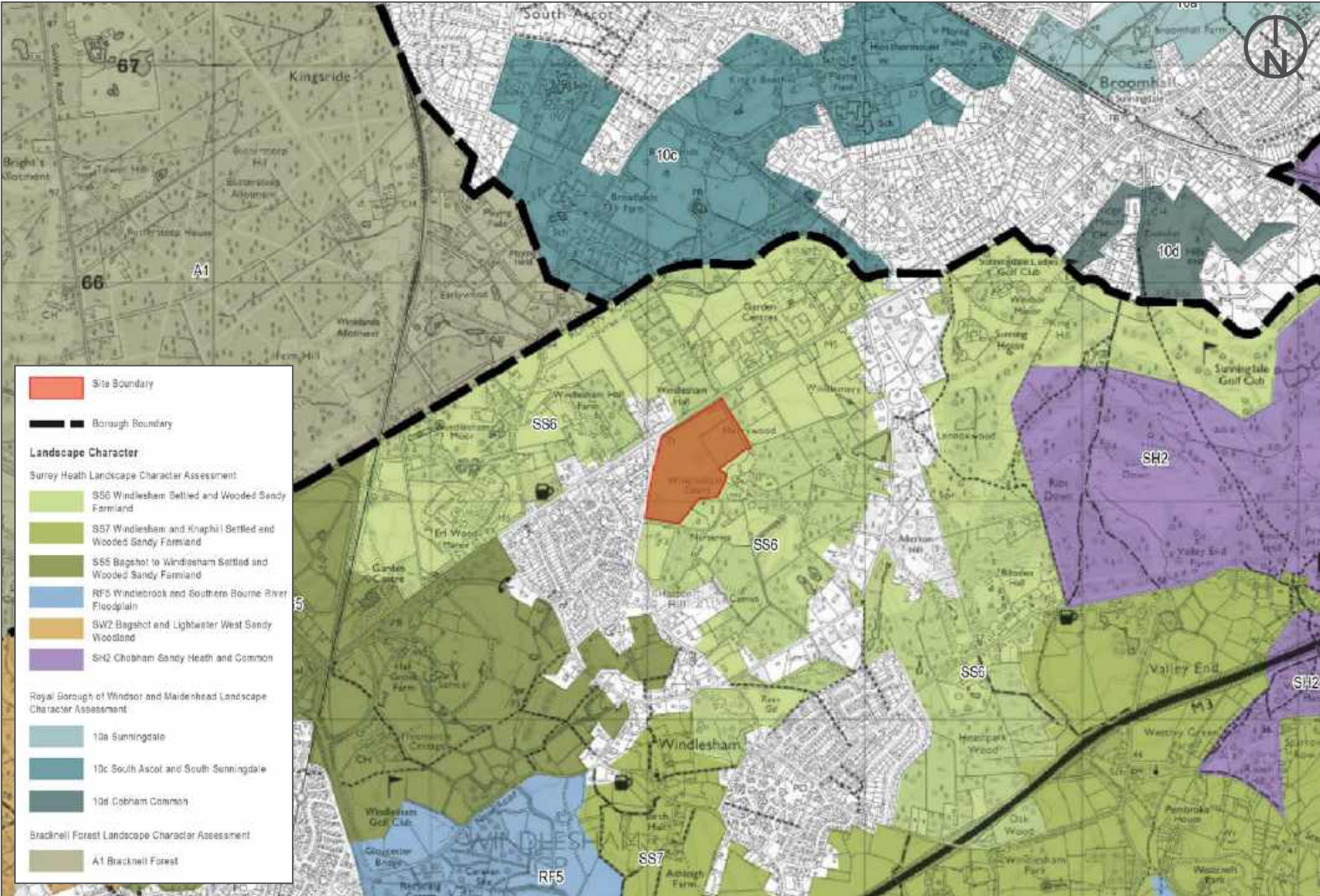
The site itself, and the landscape surrounding, is neither nationally or locally designated in terms of its landscape character.

The site is almost entirely enclosed by well vegetated mature trees and hedgerows along all boundaries, albeit that there are a few gaps in the mature vegetation along the western boundary, adjacent to Snows Ride.

The Surrey Landscape Character Assessment (April 2015), places the site within the Windlesham Settled and Wooded Sandy Farmland (SS6) character area, with a key characteristic being:

‘Settlement and surrounding built-up areas are mostly contained or screened by surrounding woodland and boundary vegetation, with the character area having limited public access. Views are substantially limited by tree cover.’

The extensive woodland surrounding the existing settlement of Windlesham provides a good level of screening to the site from the south and south east, as well as from the north and north west. It is therefore not easily visible from external public footpaths and residential properties, especially in summer, when the vegetation is in full leaf.



LANDSCAPE CHARACTER AREA

TECHNICAL ASSESSMENT

GREEN BELT

The site is currently situated within the Green Belt.

Surrey Heath Borough Council has prepared a number of assessments relating to the Green Belt, including most recently, a Green Belt Review (2022). The purpose of the Review was to provide evidence of how different areas within the Borough perform against the Green Belt purposes set out in national policy.

The subject land east of Snows Ride formed part of Parcel SR9 in the Review. The work concluded that the parcel played no function in relation to Green Belt purpose 1 (to check the unrestricted sprawl of large built up areas) or in relation to Green Belt purpose 4 (to preserve the setting and special character of historic towns). In relation to Green Belt purpose 2 (to prevent neighbouring towns merging into one another) and Green Belt purpose 3 (to assist in safeguarding the countryside from encroachment) the Council's recent work concluded that the parcel fulfilled a strong function.

The Wooldridge Group has commissioned a finer grain assessment, in terms of its Green Belt function. This work concurred with the Council's findings in relation to Green Belt purposes 1 & 4, but reached a different conclusion regarding Green Belt purposes 2 & 3.

In relation to Green Belt purpose 2, the nearest settlement, Sunningdale, is located to the north east, and any development on land east of Snows Ride would not bring about any level of coalescence. Whilst the Site does provide an open green paddock on an aerial image, in reality, the perception of the settlement gap is created by the lack of visibility of built form, and the wooded verdant and green nature of the route along London Road. Specifically, development on the land east of Snows Ride would not contribute to linear development along London Road, due to the strong vegetation along the site's northern boundary.

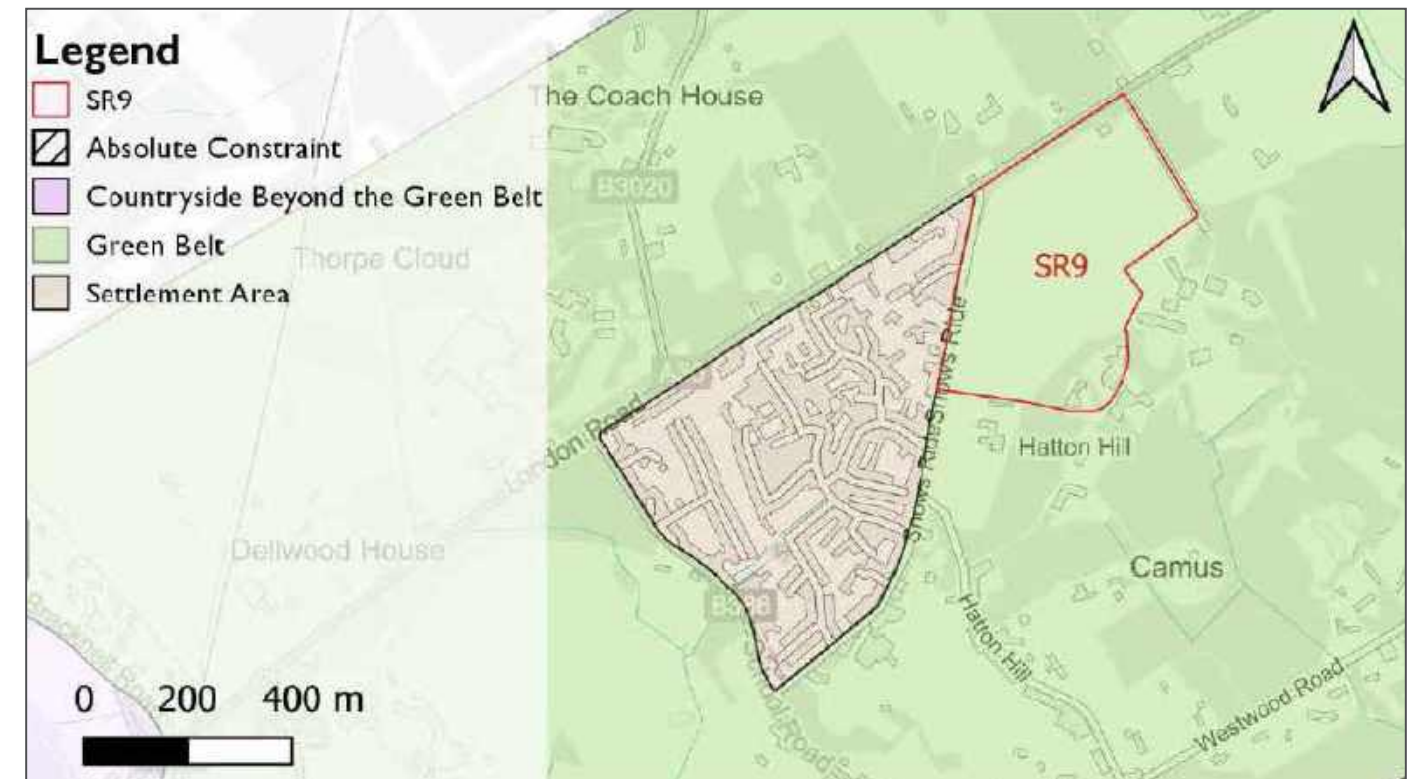
Land east of Snows Ride is adjudged to make very little contribution to Green Belt purpose 2.

In relation to Green Belt purpose 3, further consideration has been given to the nature of the setting of the site, the sensitivity of the site to landscape change, and the strength and permanence of the Green Belt boundary that would be created if development takes place. The consultants acting for The Wooldridge Group concluded that if the existing mature vegetation boundaries are retained, development is generally restricted to 2 storey height, and a new strong woodland Green Belt boundary is created, there will be little to no impact (in relation to Green Belt purpose 3) beyond the site's well contained boundaries.

Accordingly, land east of Snows Ride is adjudged to make a low contribution to Green Belt purpose 3.

The different conclusions drawn between the work undertaken by the Council, and the work commissioned by The Wooldridge Group, can be explained by the fact that the consultants acting for The Wooldridge Group were able to consider a finer grained, landscape led approach.

As a result, only part of Parcel SR9 is proposed for release from the Green Belt, with the remaining land permanently retained as SANG/ recreation space for the local community.



GREEN BELT REVIEW - PARCEL SR9

TECHNICAL ASSESSMENT

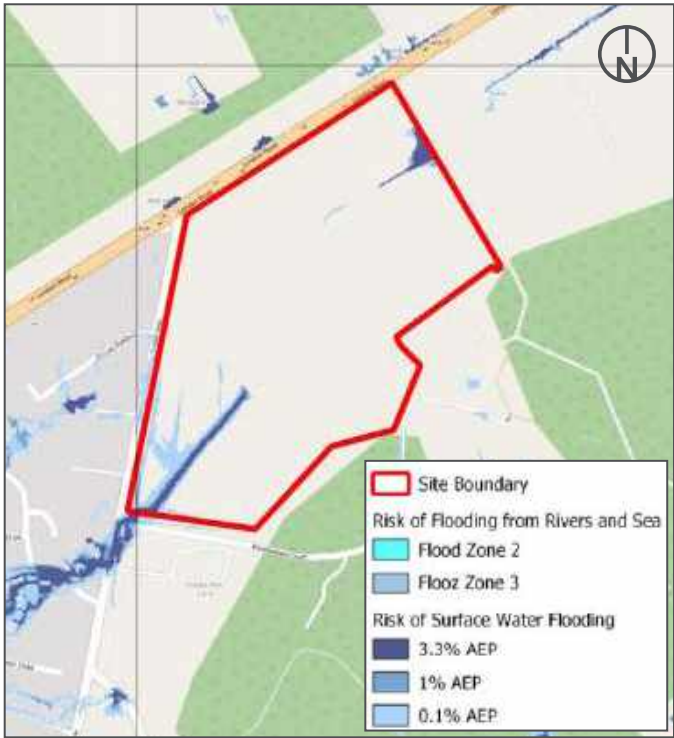
FLOOD RISK AND DRAINAGE

The site sits within Flood Zone 1, and is not at risk of fluvial flooding. However, the Environment Agency flood maps suggest that parts of the site are at risk of surface water flooding.

The site's topographic survey shows there is a natural decrease towards the centre of the site that falls to the northeast and southwest corners, coinciding where surface water run-off accumulates. An outline drainage design has been prepared, following falls in topography and allowing use of open swales.

The surface water run-off can be attenuated in a basin in the southwest corner, before being discharged at a controlled rate into the existing surface water sewer. This can either be through a new sewer connection, or via existing open ditches and small pond, near the southwestern edge of the site. Thames Water Have confirmed that there is capacity in their Foul Water sewage network for the proposed development.

The attenuation pond will be oversized in order to provide betterment through reduced run-off rates from the site.



ENVIRONMENT AGENCY SURFACE WATER FLOOD MAP

HIGHWAYS ASSESSMENT

It has been demonstrated that the site is, or can be made, accessible by a range of modes of transport other than the private car. It is has also been demonstrated that there are a range of day-to-day facilities within reasonable walking and cycling distance of the site.

A high-level assessment of the potential traffic generation from the site has been made, assuming a care village comprising of around 100 units. The assessment shows that the proposals could generate the region of 20 two-way trips in the AM peak and around 16 two-way trips in the PM peak hour.

To put this into some context, this equates to around an additional two-way vehicle trips every 3 minutes during even the busiest periods of the day.

This level of additional traffic is highly unlikely to have any impact at all on the operation and safety of the local highway network.

UTILITIES

There are existing services running along the boundary of the site, and some services that run across the site. In summary:

- There is a gas main that runs north/ south through the site.
- There is an LV main along Snows Ride.
- Affinity Water have a distribution main running down the eastern side of Snows Ride.
- BT Openreach have some overhead cabling along the eastern side of Snows Ride, in the southwest corner of our site, and there is also some underground apparatus, running east-west through the site.

The Constraints Plan below shows the routing for the utilities that run across the site.

CONSTRAINTS & OPPORTUNITIES

THE OPPORTUNITY
















Informed by the surveys and assessments undertaken by specialist consultants, and taking into account the challenges set out in Section 2 of this document, the following constraints and opportunities have been identified:

- The site benefits from strong visual enclosure as a result of the existing mature tree and scrub planting along all boundaries. This is particularly dense along the northern boundary shared with the A30 London Road. There is scope to further reinforce and enhance the site boundaries.
- An existing “square” is located in the northeastern corner, and is based on an historic field boundary. This area is defined by drainage ditches and strong tree planting. The south-eastern edge of this square is delineated by strong boundary planting to Park Place.
- Due to the natural shape of this square field, there is the potential for this area to have a strong character within the landscape strategy.
- An existing barn is located in the northern corner of the site. This is currently in a dilapidated state and will be demolished.
- Consideration of the relationship with surrounding dwellings will be crucial to any scheme. As a result, any development along Snows Ride will need to appreciate the context and setting of existing dwellings opposite.
- Topography on site is gently undulating with a low point in the south-western corner (c.62.5m AOD), rising to a high point along the eastern boundary (c.72.5m AOD).
- Existing utilities run across and around the boundary of the site. In particular, an Openreach fibre cable is routed east-west through the centre of the site, from Snows Ride through to existing dwellings in the east. A gas main runs

- parallel with existing tree planting in the north of the site, from London Road through to existing dwellings south of the “square” field.
- Technical work has demonstrated the scope for a new vehicular access into the site off Snows Ride, approximately 75m from the junction with London Road. This access can be accommodated without impacting on any Category A or B boundary trees.
 - The site is well located on the route of a frequent bus service, with a five-minute travel time to Sunningdale railway station.
 - The site is well located to benefit from local services and amenities. Two Esso MFG service stations with convenience stores are located c.350m to the west along London Road. The Lavershot Barns Garden Centre complex is c.350m to the east along London Road and offers a number of shops and a restaurant.
 - There are opportunities to create improved connections through and around the site for pedestrians and cyclists. There is scope to create an attractive pedestrian route within the site, parallel to London Road. Further, there is currently no defined pedestrian route along Snows Ride, and there is the opportunity to provide footways connecting the northwest corner of the site with London Road, and connecting the southwestern corner of the site with the existing footway provision on Hawkes Leap.
 - The site does not suffer from fluvial flooding and is located within Flood Zone 1. There is however currently a risk of surface water flooding within the south-eastern corner of the site. An outline drainage design has been prepared, which through a combination of open swales and an on-site attenuation pond, would provide betterment through reduced run-off rates from the site.

- There is scope to create a large area of SANG (Suitable Alternative Natural Greenspace), providing accessible new public open space for existing and future residents.
- The SANG area will also afford the opportunity to create new varied habitats, providing a net gain in biodiversity.
- The location of the site, and the quality of the existing environment, present an opportunity to deliver a high quality care village (alongside the aforementioned SANG), which would make a significant contribution towards meeting the local housing needs of an ageing population.

LEGEND

-  SITE BOUNDARY
-  EXISTING INTERNAL TREES
-  ESTABLISHED BOUNDARY VEGETATION
-  FALL OF LAND
-  SPOT HEIGHTS (m AOD)
-  EXISTING SURROUNDING HIGHWAYS
-  EXISTING STRUCTURE (TO BE DEMOLISHED)
-  EXISTING ELECTRICAL LINE
-  EXISTING GAS LINE
-  EXISTING WATER LINE
-  EXISTING INTERNET CABLE
-  RELATIONSHIP WITH SURROUNDING DWELLINGS
-  POTENTIAL PRINCIPAL ACCESS POINT
-  EXISTING SURFACE WATER FLOOD RISK
-  POTENTIAL PEDESTRIAN & CYCLE CONNECTIONS





THE VISION



INTRODUCTION

The emerging Local Plan sets out the very real challenges facing Surrey Heath Borough. There are clear tensions between the need to deliver new homes (including for the ageing population), along with new community infrastructure, whilst at the same time protecting and enhancing both the built and natural environment.

The land east of Snows Ride presents a unique opportunity to deliver a high quality care village and SANG recreation land, that will support the objectives of the emerging Local Plan and respond to some of the aspirations of the local community (as articulated in the Windlesham Neighbourhood Plan).

The ideas presented below are in no way fixed - they are presented to stimulate further discussion and show the potential that exists to create an exceptional environment in which to live, work and recreate.

DEVELOPMENT OBJECTIVES

The following key objectives have been distilled from the emerging Local Plan and Windlesham Neighbourhood Plan.

There will be many more detailed objectives and issues to consider in due course, but the following objectives have been used as the key drivers for the emerging vision.

The challenge is to simultaneously address each of these objectives - creating a special place to live that also delivers clear and lasting benefits for existing local residents.



OBJECTIVE 1

MEETING THE NEEDS OF AN AGEING POPULATION



OBJECTIVE 2

CREATING A HIGH QUALITY ENVIRONMENT



OBJECTIVE 3

PROTECTING AND ENHANCING BIODIVERSITY



OBJECTIVE 4

DELIVERING LOCAL COMMUNITY BENEFITS

CONCEPT MASTERPLAN

The masterplan approach seeks to address the defined objectives - creating a well-designed, carefully considered scheme, that respects the local context and is appropriate for Windlesham.

- The built development will comprise a c.5.5Ha Care Village of around 100 homes with care, defined by a series of single storey cottages set within beautifully landscaped grounds.
- The Care Village will provide communal facilities offering residents a variety of leisure, dining and relaxation services. These could include a bowling green, croquet lawn, restaurant & bar, meeting spaces and relaxation suite.
- The proposed dwellings will be of exemplary design, and set within landscaped communal parkland, creating a peaceful, idyllic and safe environment for residents.
- Affordable housing for some of the care village employees can also be provided within the Care Village. These will share a similar architectural character to the proposed residents dwellings and form part of the streetscape.
- Wrapping around the Care Village will be c.10Ha of SANG land, which will be accessible to existing local residents, and the residents of the new Care Village, all year round.
- In the northern corner of the site, a small new car park is proposed, to allow use of the SANG by visitors from further afield.
- The landscape strategy for the SANG proposes a series of biodiversity character areas, enhancing and creating a range of habitats.
- A 20% Biodiversity Net Gain is considered achievable, in accordance with emerging Local Plan policy.
- A new permanent and defensible Green Belt boundary can be formed along the eastern edge of the Care Village, meaning that only c.5.5Ha of land would be removed from the Green Belt.
- The new Green Belt will be defined by the A30 to the north, and existing trees, proposed new native species planting, and a Ha-Ha feature along the eastern and southern edge of the Care Village.
- Due to the retention of trees along London Road and Snows Ride, the site will remain visually contained, and any views of the proposed Care Village will be heavily filtered when viewed from the A30.
- The relationship between the Care Village and the surrounding SANG has been carefully considered. In particular, the public and private spaces have been clearly defined to ensure the safety and security of residents and their homes. Residents will have secure access to and from the SANG, through gated entrances that will not be accessible to the public.
- New pedestrian and cycle links are proposed within the site, parallel to Snows Ride and London Road. These will allow safe and attractive passage for pedestrians and cyclists through the site.
- The proposed new principal vehicular access into the site is off Snows Ride.
- New footways are proposed at the northern end of Snows Ride, connecting to the footways on London Road, to allow access to local amenities and services.
- A new pedestrian footway is also offered along Snows Ride south of the site. This allows safe access for existing residents to the proposed new SANG for recreation purposes.
- The proposed drainage strategy utilises open swales, connecting through to an on-site attenuation pond (in the site west corner of the site). It is proposed that the attenuation pond will be oversized, providing betterment through reduced run-off rates from the site.
- The drainage features will form key elements of the Biodiversity and Landscape strategies.



CONCEPT MASTERPLAN



OBJECTIVE 1: MEETING THE NEEDS OF AN AGEING POPULATION

This Vision Document has set out the planning challenges associated with the ageing population in Surrey Heath, including in relation to the identified need for the delivery of more specialist housing.

Whilst the draft Local Plan (March 2022) provides a permissive approach to the delivery of specialist housing, there is a very real risk that this approach will not result in the evidenced housing needs of the ageing population being met. A more proactive approach is needed, with sites allocated specifically to meet the need for specialist housing.



The Wooldridge Group propose that land east of Snows Ride is allocated for the creation of a new Care Village. The Care Village would be approximately 5.5ha in area, with much of this comprising low scale and low density cottages set within extensively landscaped grounds.

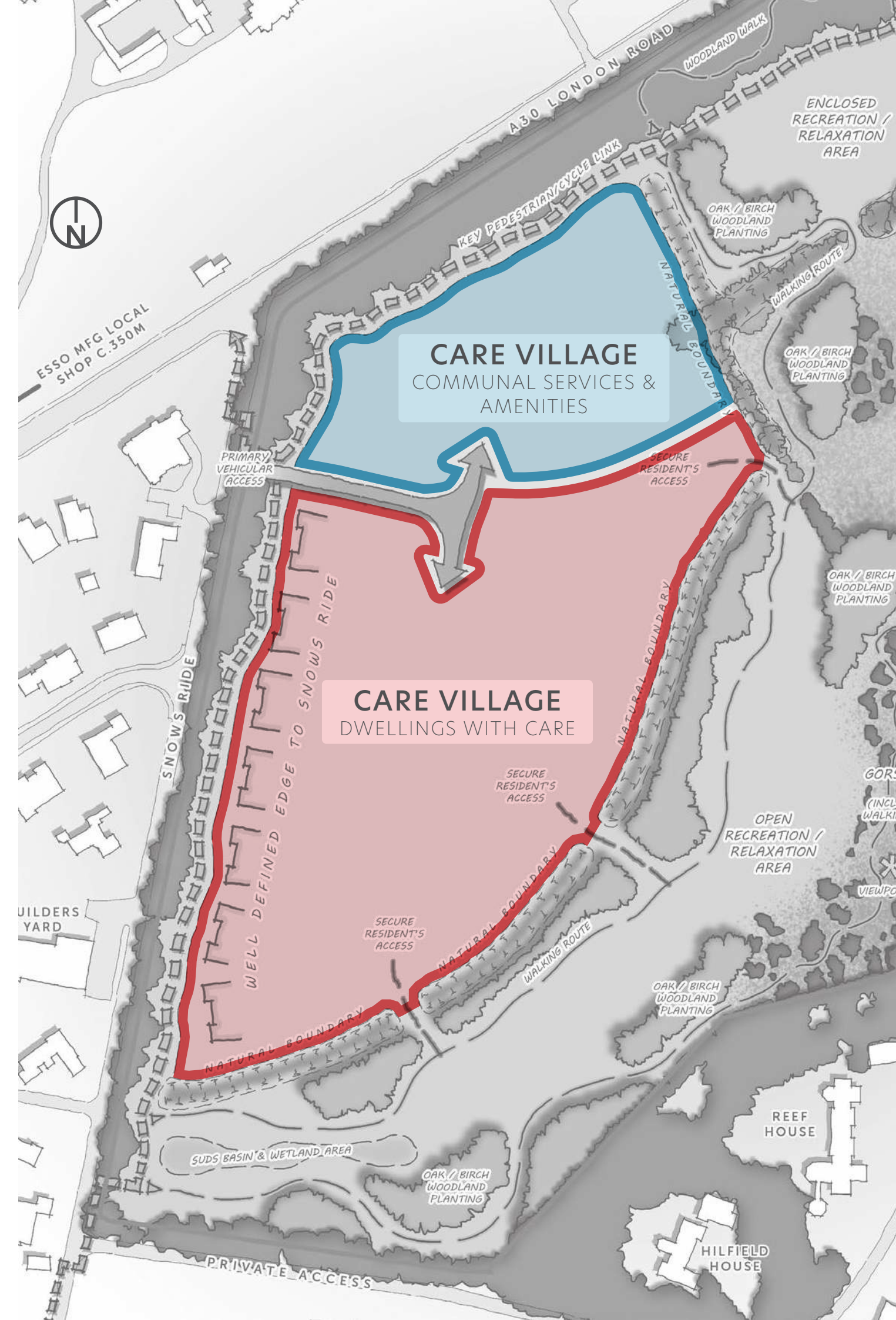
Alongside the housing with care, a number of new on-site facilities would be provided, potentially including:

- A coffee shop/café, restaurant & bar.
- Local village shop.
- A variety of lounges and areas for social activity, i.e; an events/private dining room for family celebrations, cinema room etc.
- A range of health and wellbeing facilities including: a gym, spa, swimming pool, treatment rooms, consulting rooms, hairdressing salon and nail bar.
- Formal landscaped gardens and other outside areas for residents to enjoy with their families. Including areas for gardening and outdoor activities such as croquet, lawn/boules and fitness classes.

The new homes within the Care Village will provide a local option for those wishing to downsize, helping to free-up local family housing.

LEGEND

-  COMMUNAL SERVICES & AMENITIES
-  DWELLINGS WITH CARE





OBJECTIVE 2: CREATING A HIGH QUALITY ENVIRONMENT

A key principle for the proposals is ensuring that the development is of an exemplary quality. This extends to both the built form of the Care Village, as well as the creation of the proposed SANG.

The siting, size and arrangement of both elements have been carefully considered in development the concept proposals for the site.

Details of the design and layout of the Care Village will be developed as the scheme progresses through the planning process, however some preliminary development principles are set out below:

- Dwellings to be principally semi-detached or detached cottages, loosely arranged within high-quality landscaped grounds.
- Communal services and amenities will be within a series of buildings and spaces in the north of the site.
- The dwellings will be of a high architectural quality that reflects the local vernacular, using detailing and materials influenced by local buildings.

- The residential buildings will be primarily single storey, with the potential for some dwellings to accommodate rooms in the roof.
- The communal buildings are likely to be two storeys in height. This enhanced height will assist with legibility through and around the site. This taller element also creates appropriate levels of enclosure for adjacent areas of communal open space.
- Key buildings will be used to terminate key routes through the site and define important junctions and the site entrance. These buildings will have a material uplift to provide interest in the street scene, and enhance legibility.
- All buildings will benefit from sustainable construction techniques. The latest energy and water management technologies will ensure dwellings are environmentally friendly and energy efficient.

LEGEND



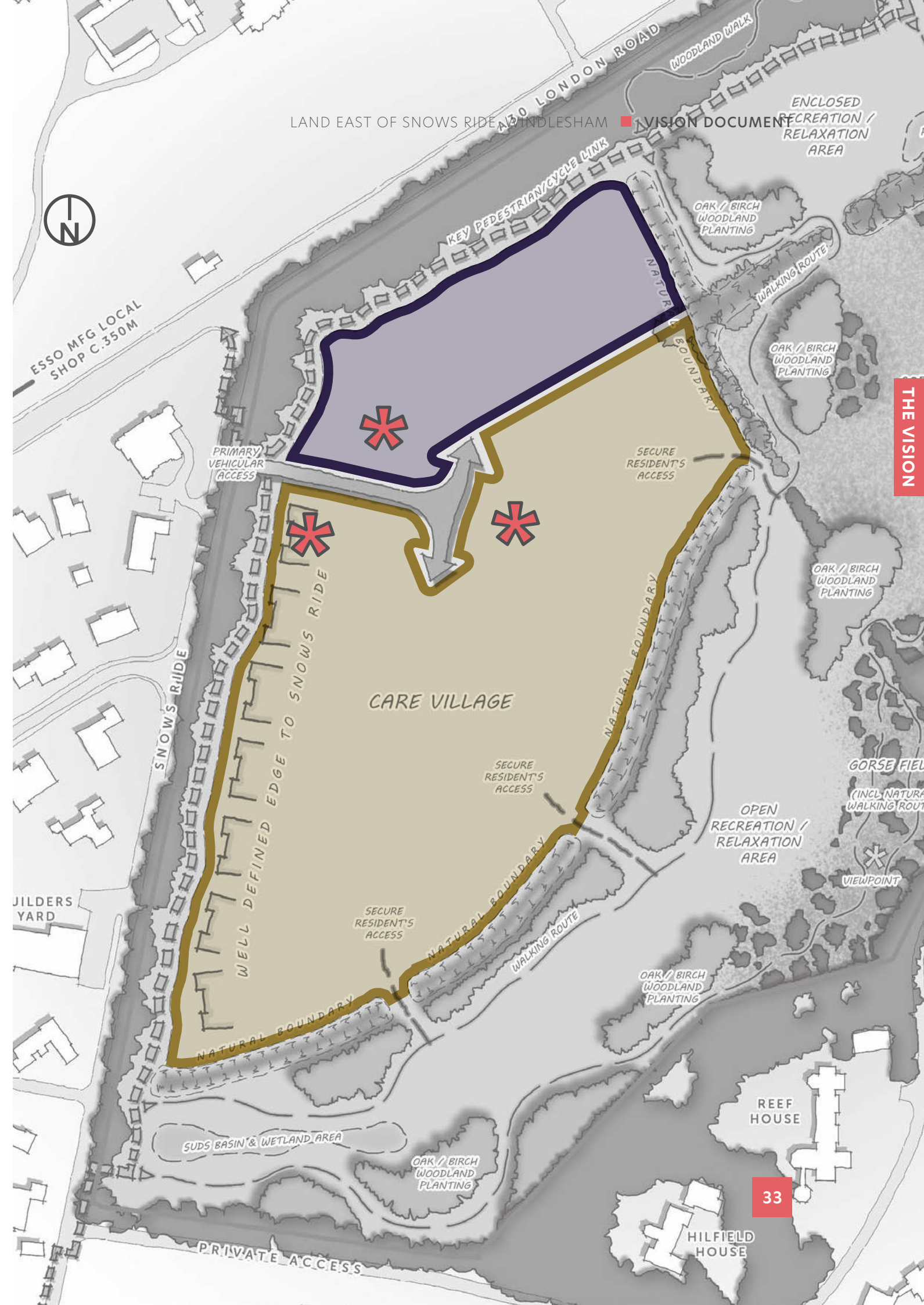
2 STOREY



1 - 1.5 STOREY



KEY BUILDINGS





OBJECTIVE 3: PROTECTING & ENHANCING BIODIVERSITY

Thames Basin Heath SPA

The Site is located outside of the 400m exclusion zone but within 5km of the Thames Basin Heaths SPA. In order to protect the SPA, the scheme at Snows Ride proposes a new area of Sustainable Alternative Natural Greenspace (SANG) of c.10Ha. This land will be accessible to the general public all year round and will provide important habitats for flora and fauna.

A considered ecology and landscape strategy has been developed for the SANG, in order to provide a variety of habitats to accommodate various species and deliver a net gain in biodiversity.

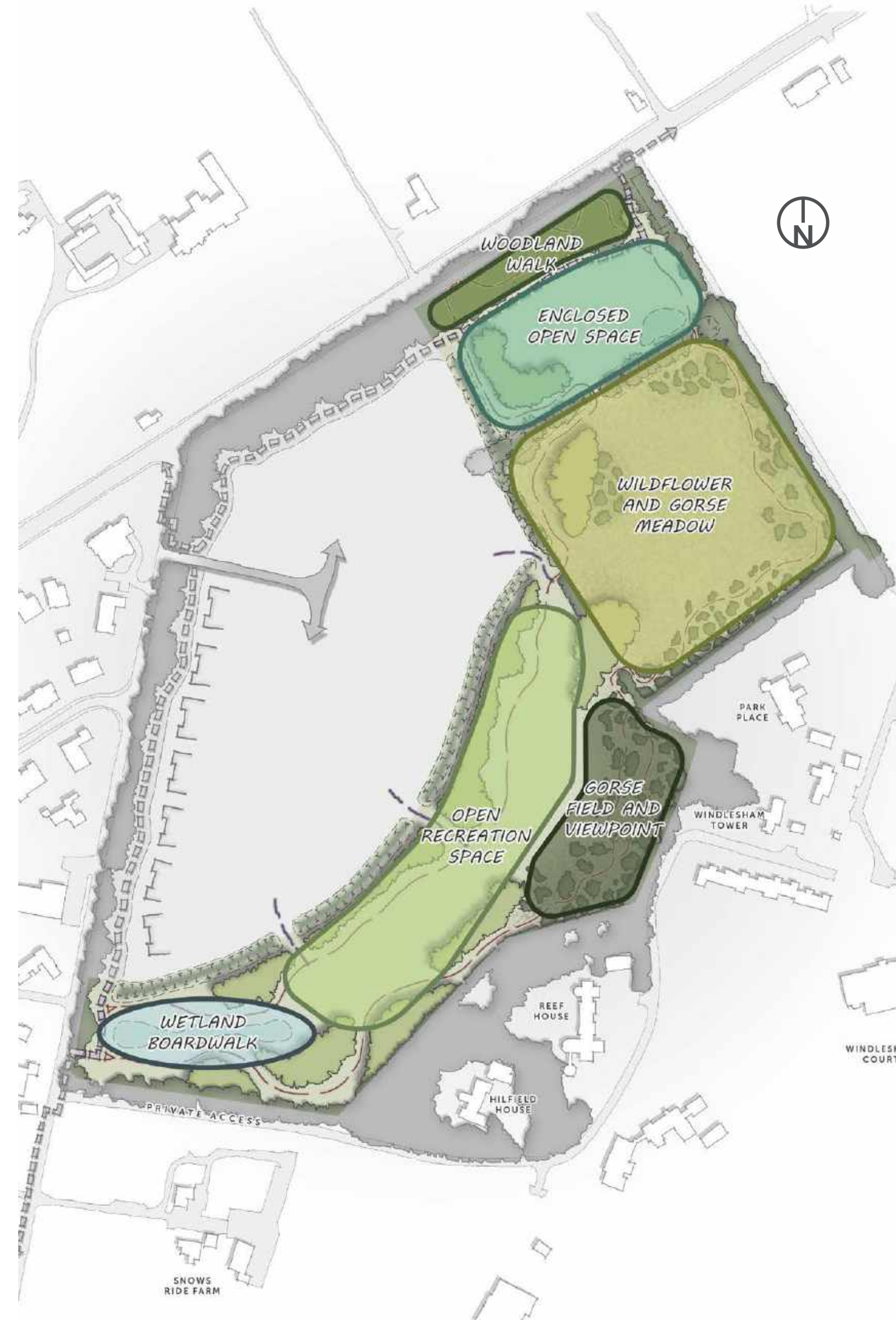
Suitable Accessible Natural Greenspace (SANG) and Biodiversity Gain

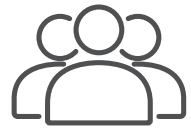
The proposed development will result in the loss of approximately 5 ha of species-poor semi-improved grassland, and the creation of a SANG, in which a variety of habitat can be created, aimed at enhancing the overall diversity of habitats and species supported by the site. New habitat will include oak birch woodland, gorse dominated scrub, wetland (ponds and marsh) and good quality semi-improved grassland.

Overall, it is considered the SANG and the proposed development is capable of delivering at least a 20% biodiversity net gain above the current baseline value of the site, through a combination of good urban design, creation of new areas of native woodland, scrub and wetland (ponds and marsh), and the enhancement of the condition of the retained poor semi-improved grassland. This level of Biodiversity Net Gain accords with emerging Local Plan policy.

The proposed SANG will provide a new recreational and biodiversity resource for new and existing local residents, who will be able to walk to and through the new SANG. The SANG could also service a wider area through the provision of a small car park in the northern part of the SANG.

Importantly, an assessment of the proposed SANG layout and design has demonstrated that it is capable of meeting all of the Natural England essential and desirable criteria for new SANG.





OBJECTIVE 4: DELIVERING LOCAL COMMUNITY BENEFITS

New Accessible Green Space

The Snows Ride area of Windlesham is currently poorly served by locally accessible open space. The proposed SANG would give local residents year-round access to an expansive, high-quality public area of green space, within easy walking distance.

New footway provision is proposed at the northern end of Snows Ride, as well as between Hawke's Leap and the south-western edge of the new SANG, to provide safe pedestrian access for existing local residents.

Within the site, a 2.3km circular walk will be provided, that weaves its way through the various character areas proposed within the SANG, providing opportunities for picnics, exercise, relaxation and areas for dogs to be off-leash.

Local Housing Choice

The Care Village will deliver the types of new home identified as being needed by the Windlesham Neighbourhood Plan. The new high-quality homes with care will provide a local option for those wishing to downsize, and should help free-up local family housing.

The Local Economy

An further benefit of the scheme is the new jobs that will be created in the Care Village, and the additional spend in the local economy.





SUMMARY



SUMMARY

This document has been prepared on behalf of The Wooldridge Group. Its purpose is to demonstrate how some of the challenges identified in the emerging Local Plan and Windlesham Neighbourhood Plan can be addressed, through sensitively planned, high quality development and green space provision on land east of Snows Ride, Windlesham.

In summary:

- The emerging Local Plan recognises the planning challenges associated with the **ageing population in Surrey Heath Borough**. In particular, there is a significant **evidenced need for more housing with care**.
- Whilst draft Policy H6 in the emerging Local Plan provides a permissive policy for the delivery of specialist housing, this is felt unlikely to meet the identified needs. **A more proactive approach should be taken to ensuring that the needs of the ageing population are met, by allocating sites specifically to meet the need for housing with care.**
- The new homes with care will provide a local **option for those wishing to downsize**, helping to free-up local family housing.

- The emerging Local Plan and related evidence base also emphasise the **importance of protecting the Thames Basin Heaths SPA, enhancing biodiversity in other parts of the Borough, and providing residents with access to strategic green space** (recognising the wide-ranging health benefits).
- Land to the east of Snows Ride, Windlesham, sits adjacent to the A30, with **good access to bus services and nearby rail services**. As importantly, many **day-to-day amenities are available within the immediate local area**, including convenience stores, garden centres (with cafes, restaurants and shops), public houses, and a GP surgery.
- The land to the east of Snows Ride extends to c.16Ha, with **no significant development constraints**. Topography on site is gently undulating, the land is very well contained by existing mature boundary trees and vegetation, there is no risk of fluvial flooding, and a new access can be created into the site off Snows Ride.
- The **proposal is to deliver a high quality c.5.5Ha Care Village, which will deliver around 100 new homes with care**, and associated supporting facilities. This will make

a significant contribution towards the requirement for specialist housing in the Borough.

- Wrapping around the Care Village will be c.10Ha of SANG land, which will provide a **locally accessible strategic recreation area for existing and new residents**.
- A finer grain assessment of the site has demonstrated that the land makes **limited contribution to the purposes of the Green Belt**. Importantly, **the significant benefits of the proposals can be delivered through the release of just c.5.5Ha of Green Belt land**, with a new permanent and defensible Green Belt boundary created on the eastern boundary of the Care Village.
- The SANG land will assist in protecting the Thames Basin Heaths SPA from additional recreation pressure, and will enable the **delivery of a 20% Biodiversity Net Gain**, in accordance with emerging Local Plan policy.



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Planning Policy
Surrey Heath Borough Council
Surrey Heath House
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GU15 3HD

9th May 2022

Dear Sirs

**SURREY HEATH LOCAL PLAN REGULATION 18 CONSULTATION RESPONSE –
LAND OFF SNOWS RIDE, WINDLESHAM**

This letter of representation is submitted on behalf of The Wooldridge Group, who have an interest in land off Snows Ride, Windlesham. A Site Location Plan is attached as **Appendix 1**.

Summary Statement

The emerging Local Plan recognises the planning challenges associated with an ageing population, including the need to deliver more housing with care. Whilst draft Policy H6 (Specialist Housing) provides a permissive policy for the delivery of specialist housing, and two of the draft allocations reference new care home delivery/ the provision of extra care or residential care uses, it is considered that these measures will not meet the evidenced housing needs of the ageing population, in particular in terms of the need for more housing with care.

A more proactive approach is required, with the allocation of additional sites specifically to meet the need for housing with care.

The emerging Local Plan and related evidence base also emphasise the importance of protecting the Thames Basin Heaths Special Protection Area (TBHSPA), enhancing biodiversity in other parts of the Borough, and providing residents with access to strategic green space (recognising the wide-ranging health benefits).

This representation makes the case for land east of Snows Ride, Windlesham, to be allocated in the Local Plan for the delivery of a new Care Village and SANG. The proposals outlined in the accompanying Vision Document (attached as **Appendix 2**), would deliver a high quality c.5.5Ha Care Village, with around 100 new homes with care, and associated supporting facilities. Such an allocation would make a significant contribution towards the requirement for specialist housing in the Borough.

Wrapping around the Care Village would be c.10Ha of SANG land, which will provide a locally accessible strategic recreation area to serve existing and new residents, as well as a wider catchment, through provision of a small car park in the north east corner of the site. This SANG land will assist in protecting the Thames Basin Heaths SPA from additional recreation pressure, and will enable the delivery of a minimum of 20% Biodiversity Net Gain (on-site), in accordance with emerging Local Plan policy.

The significant benefits of the outlined proposals can be delivered through the release of just c.5.5Ha of Green Belt land, with a new permanent and defensible Green Belt boundary created on the eastern edge of the Care Village.

Housing Needs and the Ageing Population

Housing Land Supply

As set out in the emerging Local Plan, it is our understanding that the Local Housing Need figure for Surrey Heath is 327 homes per year, which over the Plan period (2019-2038) results in a need for 6,213 new homes. However, to take account of the commitment from Hart District Council, to accommodate some of Surrey Heath's unmet need, the housing requirement in the draft Surrey Heath Local Plan is 5,680 new homes (Policy SS1: Spatial Strategy).

The Local Housing Needs Assessment (LHNA) (GL Hearn, 2020) forms an important part of the evidence base for the emerging Local Plan, and provides a more detailed assessment of local housing need in terms of the housing mix and need for affordable housing.

The Council's Housing Supply Topic Paper (2022) draws together the evidence and sets out the justification for the strategy and policy for housing in the draft Local Plan. It is clear from the Topic Paper (paragraph 4.34) that the Council has sought to maximise the identified housing land supply presented in their Strategic Land Availability Assessment (2021). Sites have been re-appraised, development density assumptions re-visited, and planning applications awaiting determination assessed, leaving "no stone unturned" in terms of potential housing delivery opportunities.

The total housing supply figure (as set out in Table 1 of the Housing Supply Topic Paper, and Table 3 of the draft Local Plan) is 6,082 dwellings.

The Housing Topic Paper then addresses the housing supply buffer, confirming that on the figures presented, there is a 7% buffer between the identified supply and housing requirement figure. Whilst some justification for this small buffer is presented in the Topic Paper, The Wooldridge Group are concerned that at this relatively early stage in the plan-making process, the Council has little flexibility in its identified supply to address matters that may well arise prior to submission of the Local Plan, or indeed, during the examination process.

The lack of flexibility is two-fold. Firstly, the buffer is small, at only 7%, and secondly, given the approach taken in the Council's Strategic Land Availability Assessment (2021), there is no realistic scope to squeeze any further capacity from the identified supply of sites. To address this concern, and provide confidence that local housing needs will be met over the Plan period, additional sites should be identified and allocated in the Regulation 19 version of the Local Plan.

Ageing Population

The Core Strategy and emerging Surrey Heath Local Plan both identify the ageing population as a key challenge, including in terms of meeting the housing needs of the ageing population.

The Local Housing Needs Assessment (LHNA) (GL Hearn, 2020) highlights that by 2040, older persons age groups are forecast to experience the most significant proportional growth, with ages 70-74 increasing by 27.6%, ages 75-79 increasing by 53.9%, ages 80-84 increasing by 59.5% and 85 years and over increasing by 107.9%. Reflecting on these changing demographics, the LHNA advises (at paragraph 7.14) that:

“Given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward.”

The LHNA identifies a deficit of some 1,284 units of specialist housing (i.e. housing with support, enhanced sheltered accommodation, and extra care housing) by 2040. The majority of the provision to meet this need should be housing with care.

Work commissioned by The Wooldridge Group supports the findings and recommendations set out in the LHNA. A Headline Need Statement for Housing with Care, prepared by Carterwood (attached as **Appendix 3**), assesses existing local provision, and the pipeline of new local provision, and concludes that there will be a shortfall of nearly 450 private housing with care units in the Borough by 2037.

Both the GL Hearn work, and that by Carterwood, demonstrate a substantial deficit in the provision of housing with care, unless new schemes are brought forward in the Plan period. The current draft of the Local Plan (Policy HA1: Housing Allocations) includes just two allocations that make explicit provision for specialist housing. Pinehurst, Camberley, is allocated for extra care or residential care uses, with an indicative capacity for 44 (net) (C3 equivalent homes), and the allocation at Mindenhurst, Deepcut, includes provision for a care home (C2).

These allocations will only make a small contribution to meeting the needs for specialist housing in Surrey Heath Borough, with the Council seeking to rely upon permissive draft Policy H6 (Specialist Housing) to address the remaining local need.

There is a very real prospect that this approach will fail to adequately address the housing needs of the ageing population. The Wooldridge Group believe that the Council should take forward GL Hearn's LHNA recommendation (at paragraph 8.21), and adopt a more positive and effective approach to ensuring that the housing needs of the ageing population are met, by allocating sites specifically to meet the need for housing with care.

Omission Site – Land East of Snows Ride, Windlesham

The Vision Document attached as **Appendix 2** outlines the merits of land east of Snows Ride, Windlesham, as a sustainable location for accommodating a Care Village and new community greenspace (Suitable Alternative Natural Greenspace – SANG).

This representation is seeking the allocation of land east of Snows Ride, Windlesham, for a high quality c.5.5Ha Care Village, with around 100 new homes with care, and associated supporting facilities. The allocation would also provide for c.10Ha of SANG land, which will provide a locally accessible strategic recreation area to serve existing and new residents, as well as a wider catchment.

Connectivity and Accessibility

The land east of Snows Ride is well connected. It sits adjacent to the A30, which is served by a frequent bus service (the 500 service) that runs between Frimley Park Hospital, Bagshot, Windlesham, Sunningdale and Staines. The nearest bus stops to the site are located on the A30, close to the northern boundary of the site.

Sunningdale railway station, and the Waitrose in Sunningdale, are just a five minute bus ride from the site. There are regular trains from Sunningdale station to central London. Bagshot railway station is also only 2.5km from the site, offering services to a range of destinations including Ascot, Guildford and Farnham.

Further detail is included in the Vision Document (attached as **Appendix 2**), and Sustainable Transport Strategy (attached as **Appendix 4**).

Many day-to-day services and facilities are also available within the immediate local area, including convenience stores, a garden centre (with cafes, restaurant and shops), public houses, and a GP surgery.

Site Constraints and Opportunities

There are no insurmountable development constraints on the land east of Snows Ride – the topography on site is gently undulating, the land is very well contained by existing mature boundary trees and vegetation, there is no risk of fluvial flooding, and a new access can be created into the site off Snows Ride.

Further detail is provided in the attached Vision Document (attached as **Appendix 2**). This provides photographs of the site, and a summary of the site constraints and opportunities.

The Vision Document also includes a summary of the technical work undertaken in support of the proposals. In addition to the technical work referenced above (the Headline Need Statement for Housing with Care, and the Sustainable Transport Strategy), the following reports are provided in support of this representation:

- Overview Tree Survey – **Appendix 5**
- Initial Flood Review and SuDS Strategy – **Appendix 6**
- Landscape and Green Belt Statement – **Appendix 7**

The Concept Proposal

A Concept Masterplan is presented in the attached Vision Document (**Appendix 2**, page 31).

It is proposed that the built development will comprise a c.5.5Ha Care Village, of around 100 homes with care, defined by a series of single storey cottages set within beautifully landscaped grounds. The Care Village will provide communal facilities offering residents a variety of leisure, dining and relaxation services.

Wrapping around the Care Village will be c.10Ha of SANG land, which will be accessible to existing local residents, the residents of the new Care Village, and a wider catchment, all year round. Overall, a minimum of 20% on-site Biodiversity Net Gain is considered achievable, in accordance with emerging Local Plan Policy.

A new permanent and defensible Green Belt boundary will be formed along the eastern edge of the Care Village, meaning that only c.5.5Ha of land would need to be removed from the Green Belt to deliver the benefits outlined (i.e. to make a significant contribution to the local need for housing with care, and to deliver c10Ha of new publicly accessible greenspace).

The Green Belt

Land east of Snows Ride is currently situated in the Green Belt.

The Council has prepared a number of assessments relating to the Green Belt, including most recently, a Green Belt Review (2022). The purpose of the Review was to provide evidence of how different areas within the Borough perform against the Green Belt purposes set out in national policy. Importantly, the stated intention of the Green Belt Review is to provide part of the necessary evidence base to determine whether there are the exceptional circumstances to warrant an alteration to the Green Belt boundaries at both a high level, and at a local level.

The subject land east of Snows Ride forms part of Parcel SR9 in the Green Belt Review. The Council's work concluded that the parcel played no function in relation to Green Belt purpose 1 (to check the unrestricted sprawl of large built up areas) or in relation to Green Belt purpose 4 (to preserve the setting and special character of historic towns). In relation to Green Belt purpose 2 (to prevent neighbouring towns merging into one another) and Green Belt purpose 3 (to assist in safeguarding the countryside from encroachment) the Council's recent work concluded that the parcel fulfilled a strong function.

The Wooldridge Group has commissioned a finer grain assessment, in terms of the subject site's Green Belt function (see Landscape and Green Belt Statement at **Appendix 7**). This work concurred with the Council's findings in relation to Green Belt purposes 1 & 4, but reached a different conclusion regarding Green Belt purposes 2 & 3.

In relation to Green Belt purpose 2, the nearest settlement, Sunningdale, is located to the north east, and any development on land east of Snows Ride would not bring about any level of coalescence. Whilst the Site is seen as an open green paddock on an aerial image, in reality, the perception of the settlement gap is created by the lack of visibility of built form, and the wooded verdant and green nature of the route along London Road.

Specifically, development on the land east of Snows Ride would not contribute to linear development along London Road, due to the strong vegetation along the site's northern boundary.

It is asserted that land east of Snows Ride makes very little contribution to Green Belt purpose 2 (to prevent neighbouring towns merging into one another). Development in the form proposed could in no way be said to result in the merging of Windlesham (Snows Ride) and Sunningdale.

In relation to Green Belt purpose 3 (to assist in safeguarding the countryside from encroachment), further consideration has been given to the nature of the setting of the site, the sensitivity of the site to landscape change, and the strength and permanence of the Green Belt boundary that would be created if development takes place. The consultants acting for The Wooldridge Group conclude that if the existing mature vegetation boundaries are retained, development is generally restricted to 2 storey height, and a new strong woodland Green Belt boundary is created, there will be little to no impact (in relation to Green Belt purpose 3) beyond the site's well contained boundaries.

Accordingly, we adjudge land east of Snows Ride to make a low contribution to Green Belt purpose 3.

It is proposed that a new Green Belt boundary can be defined by the A30 to the north, and existing trees, proposed new native species planting, and a Ha-Ha feature along the eastern edge of the Care Village.

Overall, The Wooldridge Group believe that there are the necessary exceptional circumstances for a small scale alteration to the Green Belt boundary at Snows Ride, Windlesham. At the strategic level, this representation has set out the clear risks associated with a housing land supply that only marginally exceeds the housing requirement. In addition, given that meeting the needs of the ageing population has been identified as a key challenge for the Local Plan, and given that the evidence demonstrates a significant need for more housing with care, there is much more the Local Plan could and should do to ensure that the housing needs of the ageing population are met.

At the more local level, the subject land is sustainably located, and would deliver a significant benefit for the existing local community, through the delivery of c.10Ha of publicly accessible greenspace. Further, it is submitted, that the sensitively planned, landscape led proposals presented in this representation would result in limited harm to the Green Belt (whilst delivering the aforementioned significant local benefits).

Proposed new SANG

The proposed SANG will provide a new recreational and biodiversity resource for new and existing local residents, as well as wider catchment population, who will be able to walk to, through and around the new SANG. The proposed layout for the SANG is illustrated in the Vision Document (see **Appendix 2**). This layout has been developed with input from an ecologist and landscape architect, ensuring that the layout addresses the Natural England essential and desirable criterion for new SANG.

The table attached as **Appendix 8** presents the Natural England criterion, and sets out how the proposed new SANG can meet each aspect.

Sustainability Appraisal

The Council has prepared an Interim Sustainability Appraisal (ISA) in support of the draft Local Plan (March 2022). The appraisal focuses on three growth scenarios. Scenario 1 includes all of the developable and deliverable sites from the Strategic Land Availability Assessment (alongside completions commitments and windfall). Scenario 2 has Scenario 1 as a base, but in addition, includes 800 homes at some or all of the 18 'shortlisted' Green Belt sites, and Scenario 3 also has Scenario 1 as a base, but also includes potential development at Fair Oaks Airport.

The ISA suggests (at paragraph 5.4.77) that in relation to the land east of Snows Ride (and two other sites at Windlesham) *"...there are a range of constraints, but no absolute constraints that serve to rule the sites out of contention at this stage in the process"*.

In relation to the land east of Snows Ride (site reference 809), it is not clear what constraints are being referenced, as the Strategic Land Availability Assessment (2021) simply discounts the site on the basis of its Green Belt designation.

The ISA appraises the three growth scenarios under 13 topic headings, and provides a comparative assessment between each scenario. The challenges of appraising scenarios are fully recognised, particularly where one scenario (in this case Scenario 2) has a range of site options embedded, and of course, each of those site options will have different advantages and disadvantages.

To demonstrate how well the land east of Snows Ride, Windlesham performs against the 13 topic headings, an appraisal has been undertaken, which summarises the main issues in relation to Scenario 2 (as set out in the ISA), and then considers the performance of the land east of Snows Ride in isolation. The findings of this work are presented in the table attached as **Appendix 9**.

It can be seen that nearly all of the negative issues flagged in relation to Scenario 2, are either not relevant to the land east of Snows Ride (site reference 809) or the issue can be mitigated through the design, form and layout of the proposed development.

In addition to the ISA, the Council has also prepared a Green Belt Review Sustainability Appraisal (January 2022). The aim of the latter Appraisal is to help develop an understanding of the sustainability credentials of areas of the Green Belt. Whilst the assessment results against each criteria, for each site, are not provided, the overall 'rating' for the land east of Snows Ride (site reference 809) is 'Amber'.

A brief review of the assessment criteria is presented below, taking account of the District Centre that sits just outside of Surrey Heath Borough (Sunningdale), and taking account of the proposed use of the land (Care Village and SANG):

GB Review SA Criteria	GB Review Land east of Snows Ride (site reference 809)	
Distance from bus stop		There are bus stops just north of the site, on the A30.
Frequency of bus service		There is more than one service per hour.
Distance from railway station		The railways stations at Bagshot and Sunningdale are 2.5km from the site, although Sunningdale station is a 5-minute direct bus journey.
Distance from schools		Not applicable to the Care Village proposal.
Distance from local retail services		Local convenience stores, public house, café, restaurant are all within 800m of the site, providing many of the services associated with a neighbourhood parade. These facilities will be supplemented by the facilities provided in the Care Village. The District Centre of Sunningdale is a 5-minute direct bus journey.
Distance from a doctors surgery		There is a private doctor's surgery in Snows Ride. Further, consulting rooms, providing a range of health services, will be provided within the Care Village.

It is suggested that taking into account the available frequent bus service, and the nearby train stations, as well as the proposed use of the subject site, it should have been scored as "Green" in the Council's Green Belt Review Sustainability Appraisal.

The Wooldridge Group would very much welcome the opportunity to discuss the proposals and this representation in more detail with the Council. For the reasons presented, The Wooldridge Group believe there are the exceptional circumstances to make a small amendment to the Green Belt boundary at Windlesham - to make a significant contribution towards meeting the evidenced need for more housing with care, and to deliver a large area of publicly accessible green space for both existing and new residents.

We would be grateful if you would acknowledge safe and timely receipt of this representation.

Yours faithfully



Ian Gillespie BSc (Hons) MRTPI
 Director

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m 

Encs:

Appendix 1 – Site Location Plan

Appendix 2 – Vision Document – Land off Snows Ride, Windlesham

Appendix 3 – Headline Needs Assessment

Appendix 4 – Sustainable Transport Strategy

Appendix 5 – Overview Tree Survey

Appendix 6 – Initial Flood Review and SuDS Strategy

Appendix 7 – Landscape and Green Belt Statement

Appendix 8 – Assessment of Proposed SANG against Natural England Criterion

Appendix 9 – Sustainability Appraisal Comparison Table

Representation Forms Pack

Appendix 1 – Site Location Plan



**Appendix 2 – Vision Document – Land off Snows Ride, Windlesham
(attached separately)**

Appendix 3 – Headline Needs Assessment

Headline planning need statement
Housing with care

**Land at Snow Ride,
Windlesham, GU20 6LN**

Prepared for:
Woodridge Developments Ltd

Carterwood Report – March 2022

Prepared by:

Jessamy Venables, Director
BSc (Hons) MSc MRICS
M: 07736 276486

- Sector specialists
- Data quality
- Innovation

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Instructions

T1 Instruction summary			
Client	Woodridge Developments Ltd		
Site address	Land at Snow Ride, Windlesham, GU20 6LN		
Prepared by	Jessamy Venables BSc (Hons) MSc MRICS		
Reviewed by	Jessica Stainthorpe BSc (Hons)		
Research date	15 March 2022	Report date	24 March 2022
T2 Purpose of advice			
Purpose of report	<p>This headline planning need statement provides a brief analysis of the quantitative need for private housing with care/extra care to inform the initial decision-making process and for pre-application discussions with the local planning authority.</p> <p>Our report is for the use of the client only and should not be used for any purpose other than the purpose stated. <u>It is not a valuation and must not be used for, inter alia, loan security purposes, submission with a planning application or as part of a planning appeal.</u></p>		
Important notice	<p>Our sources of information and limitations to our advice are provided within Appendix A and should be read fully in conjunction with our report.</p> <p>All recommendations are based upon the market and financial climate as at the date of issue of the report.</p>		
T3 The application			
Instruction background	<p>Headline planning need statement commissioned to inform pre-application enquiries with Surrey Heath Borough Council prior to the submission of a planning application for an integrated retirement community/ care village.</p> <p>We understand the proposed integrated retirement community will provide approximately 120 units of private housing with care with associated communal facilities and care support services.</p>		
The development	<p>The integrated retirement community will provide an environment where residents will be able to access support and care from the on-site care team. As individual care and support needs increase, residents will be able to receive the level of support and care they require, administered easily within their own home.</p>		
T4 Carterwood			
<p>Carterwood provides advice across the care sector to a range of operators, developers and other stakeholders.</p> <p>Carterwood's client base represents many operators currently seeking to develop new care homes and extra care schemes. Accordingly, we are in an almost unique position in the sector, having assessed over 4,000 sites since 2008, for a range of providers across a range of scheme types and care categories.</p>			

Need statement conclusions

T5 Market commentary		
Assessed catchments	<ul style="list-style-type: none">A circa 5-mile market catchment.The Surrey Heath Borough Council local authority area.	
Year of assessment	2025, the earliest the proposed housing with care in the integrated retirement community could start to be made available.	
Existing private housing with care	Market catchment	4 schemes providing 350 private housing with care units
	Local authority area	0 schemes providing 0 private housing with care units.
	Market catchment	162 units with planning permission and 10 pending.
	Local authority area	46 units with planning permission and 0 pending.
Planned private housing with care	Market catchment	Net need for 174 units
	Local authority area	Net need for 368 units
	Existing supply and <u>all</u> planned units (with planning permission and pending) are included in the analysis.	
Projected private housing with care net need (2032)	Market catchment	Net need for 260 units
	Local authority area	Net need for 406 units
	Existing supply and <u>all</u> planned units (with planning permission and pending) are included in the analysis, with no allowance for closures of obsolete stock.	
Conclusion	<p>We consider there is a significant and growing identified need for additional private housing with care within the market catchment and the Surrey Heath Borough Council area.</p> <p>A proposed integrated retirement community would assist in addressing the current significant shortfall and the increasing future need for additional private extra care within a high-quality setting with associated facilities and amenities. This would provide an appealing option for older people along with the resultant benefits to residents, the NHS and the local community.</p>	

Need analysis summary

T6 Need analysis (2025) for private housing with care			
Catchment area	5-mile market catchment	Local authority area	
Year of assessment	2025	2025	
Gross need			
Total 75+ population	17,406	10,360	
Gross need for private housing with care (4.0%)	696	414	
Private housing with care supply			
Current supply (units)	350	0	
Planned units by operational year	172	46	
Total supply (units)	522	46	
Net need			
Net need for private housing with care units	174	368	
T7 Net need for private housing with care units – medium to long term			
Catchment	5-mile market catchment	Local authority area	
Year			
2022	293	387	
2025	174	368	
2027	198	378	
2032	260	406	
2037	349	448	
2042	453	500	
Net need for private housing with care units			

Assessed catchment areas



Figure 1: Catchment area map

Notes
<ul style="list-style-type: none">Gross need for housing with care is assessed using the Housing LIN Strategic Housing for Older People (2011) (SHOP) and the Housing in Later Life (2012) tools, which we consider best reflect the underlying need characteristics of private housing with care.Key year of analysis based upon 2025 – the earliest possible year units within the proposed development could be available.Existing supply includes private extra care, enhanced sheltered housing and assisted living.Planned supply based upon individual assessment of each scheme and assessment of earliest likely year of development completion (or earliest possible year should planning be forthcoming for pending applications).

Market catchment

T8 Gross need for private housing with care in market catchment (2025)		
Type of accommodation	Private housing with care units	
Gross need (4.0%)	696	

T9 Existing supply of private housing with care (market catchment)			
Scheme type	Schemes (No.)	Units (No.)	Private units (No.)
Market catchment	5-mile	5-mile	5-mile
With on-site care/support	4	401	350

T10 Planned supply of new private housing with care by estimated year of delivery		
Planned supply pipeline by year of delivery		Market catchment
2022		0
2023		162
2024		0
2025		10
2026+		0
Total planned units		172
Total number of schemes		3

T11 Planned supply of new private housing with care		
Catchment	Market catchment	
New-build OPH units: pending decision	10	
New-build OPH units: granted permission	162	
Total planned units	172	
Total number of schemes	3	

Local authority area

T12 Gross need for private housing with care in local authority catchment (2025)		
Type of accommodation	Private housing with care units	
Gross need (4.0%)	414	

T13 Existing supply of private housing with care (local authority area)			
Scheme type	Schemes (No.)	Units (No.)	Private units (No.)
Local authority area			
With on-site care/support	0	0	0

T14 Planned supply of new private housing with care by estimated year of delivery		
Planned supply pipeline by year of delivery		Local authority area
2022		0
2023		46
2024		0
2025		0
2026+		0
Total planned units		46
Total number of schemes		1

T15 Planned supply of new private housing with care		
Catchment	Local authority area	
New-build housing with care units: pending decision	0	
New-build housing with care units: granted permission	46	
Total planned units	46	
Total number of schemes	1	

Existing supply

T16 Summary of existing schemes								
Map ref	Catchment	Scheme	Manager / operator	Distance to subject site (miles)	Total units	Private units	Scheme type	Year of construction
1	Market catchment only	Lynwood Village, Rise Road, Sunninghill, Ascot, Berkshire, SL5 0AJ	BEN - Motor & Allied Trades Benevolent Fund	1.6	171	171	Extra care	2015
2	Market catchment only	Audley Sunningdale Park, Silwood Road, Sunningdale, Ascot, Berkshire, SL5 0QD	Audley Villages	2.1	125	125	Extra care	2022
3	Market catchment only	Augustus House, Station Parade, Virginia Water, Surrey, GU25 4AB	YourLife Management Services	4.6	40	40	Extra care	2018
4	Market catchment only	Clement House, Johnston Close, Hurley Drive, Bracknell, Berkshire, RG12 2GH	Silva Homes	4.8	65	14	Extra care	2015

Planned supply

T17 Summary of planned provision										
Map ref	Catchment area	Site address	Applicant	Scheme	Net private housing with care units	Development commenced	Estimated year of delivery	Distance from subject scheme (miles)	Planning ref./date granted	Notes
Granted										
A	Market and local authority	42 London Road, Bagsnot, Surrey, GU19 5HL	Your Life Management Services Limited	Construction of a part three-, part four-storey building to provide 46 extra care apartments including associated facilities, car parking and landscaping following the demolition of existing buildings includes sustainable urban drainage system.	46	Yes	2023	1.7	18/1083 - 30/07/2020	-
B	Market catchment only	Guldford Road, Chertsey, Surrey, KT16 0AG	C Squared Property Developments Ltd	Reserved matters applications pursuant to outline planning permission RU.17/1815 to consider access, appearance, landscaping, layout and scale relating to a 116-unit retirement village with care building (use class C2) with associated infrastructure landscaping and car parking, includes natural ventilation.	116	Yes	2023	5.6	RU.19/1609 - 14/02/2020	This application forms part of a wider development
Pending										
C	Market catchment only	Ascot Priory, Priory Road, Ascot, Berkshire, SL5 8RT	Private individual	Alterations and extensions to St David's Nursing Home following demolition of non-original buildings and extension to St Christopher's care home and conversion of the south wing and undercroft to provide 10 apartments and associated works including car parking and landscaping.	10	-	2025	3.3	20/00503/FUL	This application includes extensions and internal alterations at St Davids Nursing Home together with 10 independent living flats.

Source: see Appendix A
Notes: Planning research was undertaken on 15 March 2022. Any applications submitted onto our planning registers after this date will be excluded from our analysis. We have only researched planning applications for new-build private housing with care schemes that have been granted or are pending decision. Extensions to existing schemes have not been researched.

Competition map

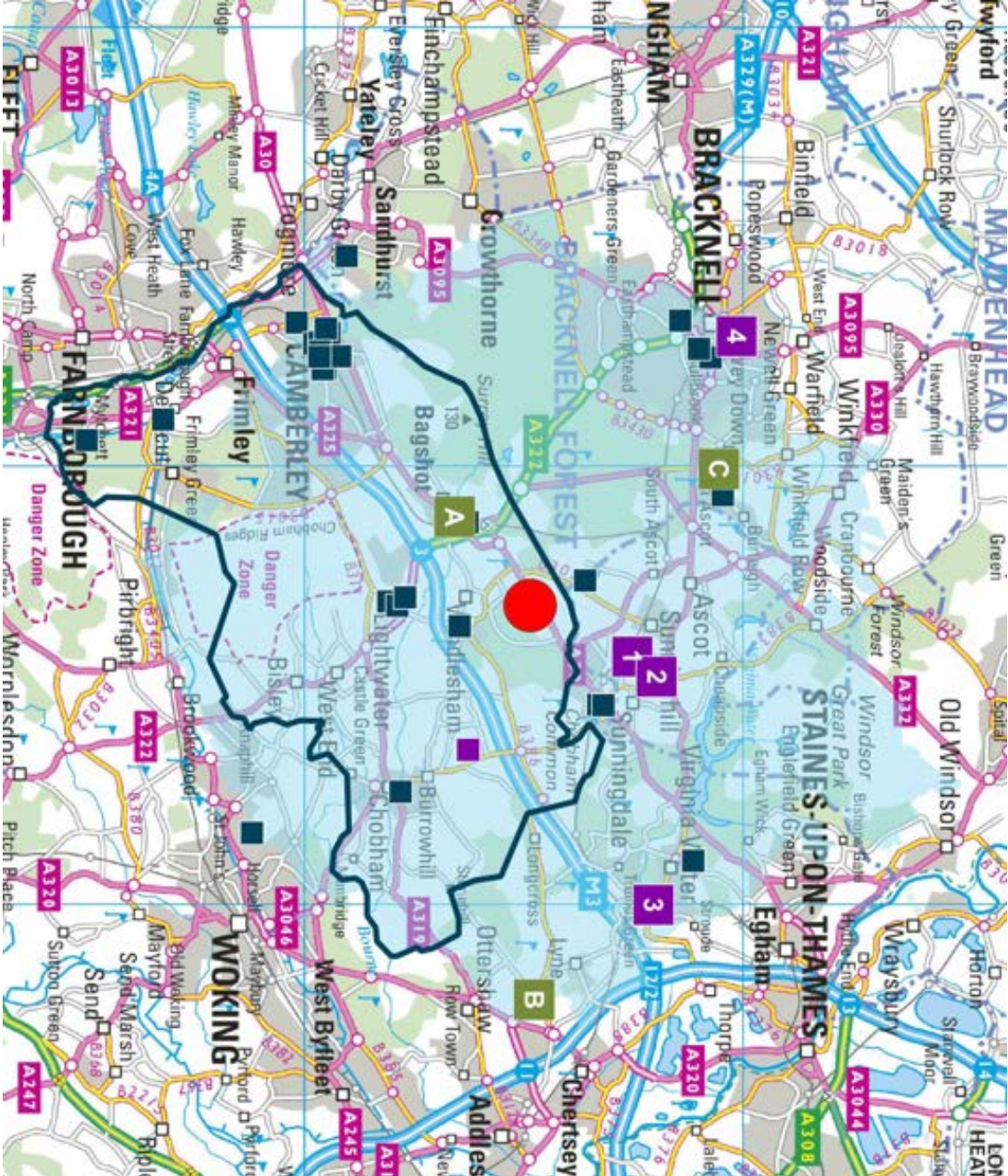
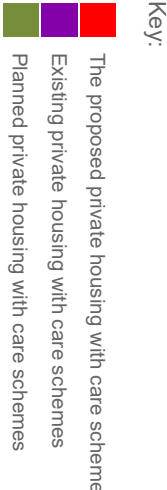


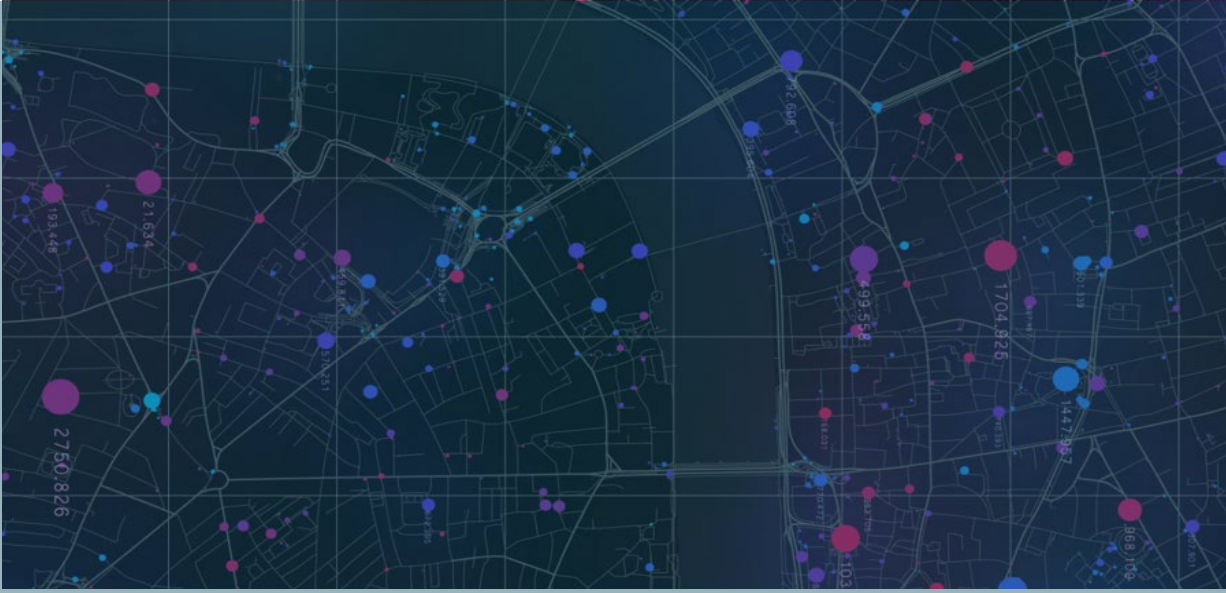
Figure 2: Existing private housing with care and planned schemes within the catchment areas assessed



Map references refer to schemes identified in tables T16 and T17.



Figure 3: National map



Appendices

Sources and limitations of advice

Definitions and reservations

T18 Sources of data

Census 2011 population statistics, ONS 2018-based population projections, EAC database, Cartenwood database, relevant planning departments, Ordnance Survey data © Crown copyright and database right (2018), LPS Intellectual Property © Crown copyright and database right (since 2016), Glenigan, Planning Pipe and Housing LIN.

Methodology

A detailed methodology is available upon request

T19 Limitations of advice

Data sources	<ul style="list-style-type: none">All information supplied by the client, its professional advisors, local authorities, social services, statutory bodies, investigation agencies and other stated sources is accepted as being correct and accurate. In accordance with our definitions and reservations (attached), should such information be proven through further investigations to be incorrect, then this could affect our advice.Map sources contain Ordnance Survey data © Crown copyright and database right (2018); Map data ©2019 Google; LPS Intellectual Property © Crown copyright and database right (since 2016).
Confidentiality	<ul style="list-style-type: none">This report is for the stated purposes only and for the sole exclusive use of the named client, to whom it is addressed.Neither the whole, nor any part of this report or any reference to it, may be included now or at any time in the future, in any published document, circulation or statement, nor referred to or used in any way, without our written approval and context to which it may appear.
Conflict of interest	<ul style="list-style-type: none">There are no conflicts of interest that we are aware of that would prevent us from providing our advice.
Market conditions	<ul style="list-style-type: none">The trading environment of the care sector in the UK, which impacts upon market conditions, remains in a volatile state. Contributing factors include some ongoing uncertainty around the post-Brexit trading conditions, operating with the legacy and future risks of Covid-19 and the effect of the conflict in Ukraine and the resulting inflationary pressures. Our reports are prepared using high quality data and expert analysis from our experienced team. Any recommendations made are based upon the market and financial climate as at the date of the report, but do not take into account future economic or market fluctuations caused by the events outlined above or other unforeseen events. With this in mind, it may be prudent to review a commissioned report periodically in light of any significant developments which may affect the care sector.
Census 2021	<ul style="list-style-type: none">This report contains data relating to the 2011 census. The England and Wales 2021 census took place on 21 March 2021; the initial findings from this census are currently due to be published from March 2022, with the final release of all data outputs for England and Wales due by March 2023. The Scottish census has been delayed until 2022. We will monitor the census data release schedule, reviewing new data as it is released and ensuring the data is embedded into our analysis as quickly as possible.

Timing of advice

Our work commenced on the date of instruction and the collection and compilation of data and other research contained within our work was undertaken at varying times during the period prior to completion of this report.

The report, information and advice provided during our work were prepared and given to address the specific circumstances as at the time the report was prepared and the scope and requirements set out in the engagement letter. Cartenwood has no obligation to update any such information or conclusions after that time unless it has agreed to do so in writing and subject to additional cost.

Data analysis and sources of information

Details of our principal information sources are set out in the appendices and we have satisfied ourselves, so far as possible, that the information presented in our report is consistent with other information such as made available to us in the course of our work in accordance with the terms of our engagement letter. We have not, however, sought to establish the reliability of these information sources by reference to other evidence.

The report includes data and information provided by third parties of which Cartenwood is not able to control or verify the accuracy.

We must emphasise that the realisation of any prospective financial information or market or statistical estimates set out within our report is dependent on the continuing validity of the assumptions on which it is based and may be subject to other variables and factors outside the scope of our report. Any assumptions stated in the report will need to be reviewed and revised to reflect market conditions. We accept no responsibility for the realisation of the prospective financial or market information. Actual results may be different from those shown in our analysis because events and circumstances frequently do not occur as expected, and the differences may be material.

Measuring and predicting demand is not an exact science, and it should be appreciated that there are likely to be statistical and market related factors that could cause deviations in predicted outcomes to actual ones.

We have undertaken certain analytical activities on the underlying data provided by third parties to arrive at the information presented. We cannot and do not accept responsibility for the completeness or accuracy of this underlying data.

Where we have adapted and combined different data sources to provide additional analysis and insight, this has been undertaken with reasonable care and skill. The tools used and analysis undertaken are subject to both internal and external data-checking, proof reading and quality assurance. However, when undertaking complex statistical analysis it is understood that the

degree of accuracy is never absolute and there is inevitably variance in any findings, which must be carefully weighed up with all other aspects of the decision-making process.

The estimates and conclusions contained in this report have been conscientiously prepared in the light of our experience in the property market and information that we were able to collect, but their accuracy is in no way guaranteed.

All advice has been prepared on a 'desktop' basis and where we have prepared advice on a 'headline basis', we have conducted a higher level and less detailed review of the market. If commissioning a Headline Market Analysis report it we recommend commissioning a comprehensive market analysis report before finalising the decision-making process. Where we have provided 'comprehensive' advice, we have used reasonable skill and endeavours in our analysis of primary and secondary (for example, Census, Land Registry, etc.) data sources, but we remain reliant upon the quality of information from third parties, and all references above to accuracy, statistics and market analytics remain valid.

Purpose and use

The report has been prepared for the sole use of the client and any other persons specifically named in our engagement letter and solely for the purposes stated in the report. The report should not be relied upon by any other person or for any other purposes. The report is given in confidence to the client and any other persons specifically named in our engagement letter and should not be quoted, referred to or shown to any other parties without our prior consent.

The data, information and any conclusions in the report should not be used as the sole basis for any business decision, and Cartenwood shall not be liable for any decisions taken on the basis of the same. The client should independently verify any data or information in the report which may be relevant to taking a business decision.

This report is for general informative purposes only and does not constitute a formal valuation, appraisal or recommendation. It is only for the use of the persons to whom it is addressed and no responsibility can be accepted to any third party for any reliance placed on the whole or any part of its contents. It may not be published, reproduced or quoted in part or in whole, nor may it be used as a basis for any contract, prospectus, agreement or other document without Cartenwood's prior consent, which will not be unreasonably withheld.

Extraordinary market factors

The trading environment of the care sector in the UK, which impacts upon market conditions, remains in a volatile state. Contributing factors include some ongoing uncertainty around the post-Brexit trading conditions, operating with the legacy and future risks of COVID-19 and the effect of the conflict in Ukraine and the resulting inflationary pressures. Our reports are prepared using high quality data and expert analysis from our experienced team. Any recommendations made are based upon the market and financial climate as at the date of the report, but do not take into account future economic or market fluctuations caused by the events outlined above or other unforeseen events. With this in mind, it may be prudent to review a commissioned report periodically in light of any significant developments that may affect the care sector.

Census 2021

This report contains data in relation to the 2011 census. The England and Wales 2021 census took place on 21 March 2021 and at present there is no confirmation of when the data will become available due to the Scottish census being delayed until 2022. We are monitoring the current situation, but we anticipate that data will not be available until 2022 at the earliest.

Intellectual Property

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Appendix 4 – Sustainable Transport Strategy (attached separately)

Appendix 5 – Overview Tree Survey



Overview Tree Survey

Snows Ride Windlesham

Written by: Tom Grayshaw
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Date: 07/04/2022
Job number: 2457
Report reference: TGA.2457OverviewTreeSurvey

Contents

1. Introduction	3
2. Survey method & limitations	4
3. Constraints & opportunities.....	5
4. Conclusions & recommendations	10
5. Tree Survey Schedule	11

1. Introduction

- 1.1. TGA Ltd was instructed by The Wooldridge Group in March 2022 to carry out an overview survey the trees at Snows Ride, Windlesham. Trees were assessed as group features to provide overview information in terms of constraints and opportunities. The survey was carried out on 30th March 2022 by the author.
- 1.2. More detailed BS5837:2012 survey information was gathered for individual trees adjacent to Snows Ride, to assist with the identification of a suitable place for a proposed access.
- 1.3. The reference for the Tree Survey Plan that accompanies this report is TGA.2457.TSP.001.
- 1.4. The survey plan is based on the supplied topographical ground survey, reference TG-22-1365-01.
- 1.5. This report provides tree survey data in the context of development constraints and was not carried out for health and safety purposes.
- 1.6. The controlling authority is Surrey Heath Borough Council who can be contacted at: www.surreyheath.gov.uk
- 1.7. According to a search of the Surrey Heath Borough Council online mapping service there is a Tree Preservation Order covering trees on the east side of Snows Ride reference TPO/1/56.

2. Survey method & limitations

- 2.1. The survey has been carried out following the recommendations of BS5837:2012 Trees in relation to design, demolition and construction – Recommendations. Further notes on survey method are included in the comments section of the schedule where required.
- 2.2. The majority of trees have been assessed as group features to provide overview level information with average estimated dimensions and category as a group.
- 2.3. Where trunk diameters were measured this was at 1.5m above ground level using a diameter tape. Multiple stemmed trees are measured according to section 4.6 of BS5837:2012. For groups of trees the diameter given may be an estimated average or an estimated maximum.
- 2.4. Tree heights were measured with a Hagloff clinometer or estimated in relation to those measured with the clinometer.
- 2.5. Categories are based on the Table 1 - Cascade chart for tree quality assessment from BS5837:2012 (see appendix 1 below). An assessment was made of each tree's health and condition, and an assessment of its life expectancy if its surroundings were to be unchanged.
- 2.6. Trees of A and B category should be considered as constraints to development and every attempt should be made to incorporate them into any proposed development design.
- 2.7. C category trees will not usually be retained where they would impose a significant constraint to development, but should be retained where there is no reason for their removal.
- 2.8. U category trees are in such a condition that they are unlikely to contribute beyond 10 years, and may be removed as good arboricultural practice.

3. Constraints & opportunities

- 3.1. The site comprises a field currently in use for equine purposes with one hay barn at the north. The field is further divided with a square shaped paddock at the eastern end.



Overview of site included in survey

- 3.2. To the north is the A30 London Road. At the west is Snows Ride. On the eastern boundary there is a private driveway. To the south of the site there are residential properties.
- 3.3. The site is bounded by a mixture of post and wire fence, close board fence and brick wall. There is a gate providing vehicle access to the field via Snows Ride. There is an access at the north east with an unmade track leading to the barn.
- 3.4. The site has a large number of mature deciduous trees on the boundaries, and is but mostly devoid of trees on the site interior. See tree survey schedule at section 5 below.
- 3.5. On the northern boundary is a strip of good quality mixed deciduous woodland (W1). It can be seen the group was two rows of trees, with self seeded and understorey trees grown up between the rows to form a continuous wooded group an average of approximately 25m in width. The group acts as a dense visual screen between the site and the A30 London Road. There are a small number of A category mature Oak trees. Collectively the group is B category, and a constraint to any development in arboricultural terms.

- 3.6. On the northeast boundary there are mature native broadleaf trees, predominantly oak, which mark the boundary between the field edge and the private drive. These are A and B category trees, but with little understorey or regeneration growth. The existing trees are a constraint, and there would be the opportunity for additional planting on the boundary where there are gaps, should this be desired.
- 3.7. At the eastern end of the site there are two rows of trees (G4 & G5) that define a smaller paddock. The trees are relatively low quality as individuals, and are consistent with hedgerow planting that has become unmaintained. The trees are growing along a wet ditch. On an individual basis none of the trees would represent a development constraint in arboricultural terms however retention would be preferable as the group have landscape, ecological and historical value.
- 3.8. There are two Leyland Cypress hedges (G3 & G7) which act as a dense visual screen between the site and the residential properties to the south. These are offsite, and therefore in third party ownership. The groups should be considered in terms of shading.
- 3.9. At the south east there are mixed deciduous trees planted sporadically near the boundary. These offer some screening, but do not form a continuous group. The opportunity would be there for additional planting to act as screening to the properties beyond should that be required.
- 3.10. On the southern boundary there are trees planted in a linear feature along the private driveway located just offsite at the south (G9). These are on or near the boundary and would be retained as being in third party ownership. Given their location on the southern boundary they would represent a constraint in terms of potential shading.
- 3.11. On the western boundary with Snows Ride there are mainly Oak trees and a smaller number of Birch and Sweet Chestnut on a ditch and bank feature. There is a mixture of larger mature B category trees and then smaller lower quality C category trees present as understorey. Trees on the boundary are included within TPO reference TPO/1/56. The trees form a linear feature consistent with having arisen from hedgerow planting on the ditch and bank feature which is present. There is the opportunity to provide an access on this boundary between the better quality trees (see further below).



View of W1 woodland group on northern boundary with A30



East of site, W1 woodland group on right



Trees on eastern boundary in G2



G3 Leyland Cypress on southeast boundary



G5 group forming internal boundary for square field



G6 trees at east of site



G9 trees on southern boundary



South west corner of site with Snows Ride to right of picture



Example of trees on Snows Ride

4. Conclusions & recommendations

- 4.1. The survey was carried out to provide overview tree constraints and opportunities information, to inform a vision document outlining potential development of the site. Before any detailed site layout is produced, a full BS5837:2012 tree survey should be undertaken.
- 4.2. The trees at the site are located at the site boundaries and have landscape value as site screening. There is ample scope on this site to allow development, whilst retaining the tree groups present, and also ensuring there is a sustainable relationship with retained trees and the development proposals.
- 4.3. More detailed survey information taken for the trees adjacent to Snows Ride indicates that there is scope to provide an access into the site from that road. There are several locations on the boundary where there are low quality C category trees that could be removed to allow for an access. In these locations there are gaps between the RPAs of B category trees where an access could be provided without causing adverse impact.
- 4.4. The area within the site is devoid of trees, and therefore there is the opportunity for significant tree planting as part of any development.
- 4.5. When a final layout design is produced, an Arboricultural Impact Assessment (AIA) should be completed to evaluate the direct and indirect effects of the proposed design, and where necessary recommend mitigation. Where such mitigation is required, an Arboricultural Method Statement and Tree Protection Plan should be produced to provide protection measures as per BS5837:2012 recommendations.

Tom Grayshaw BA (Hons) Tech Cert (ArborA) Dip Arb L6 (ABC) MArborA
7th April 2022

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5. Tree Survey Schedule

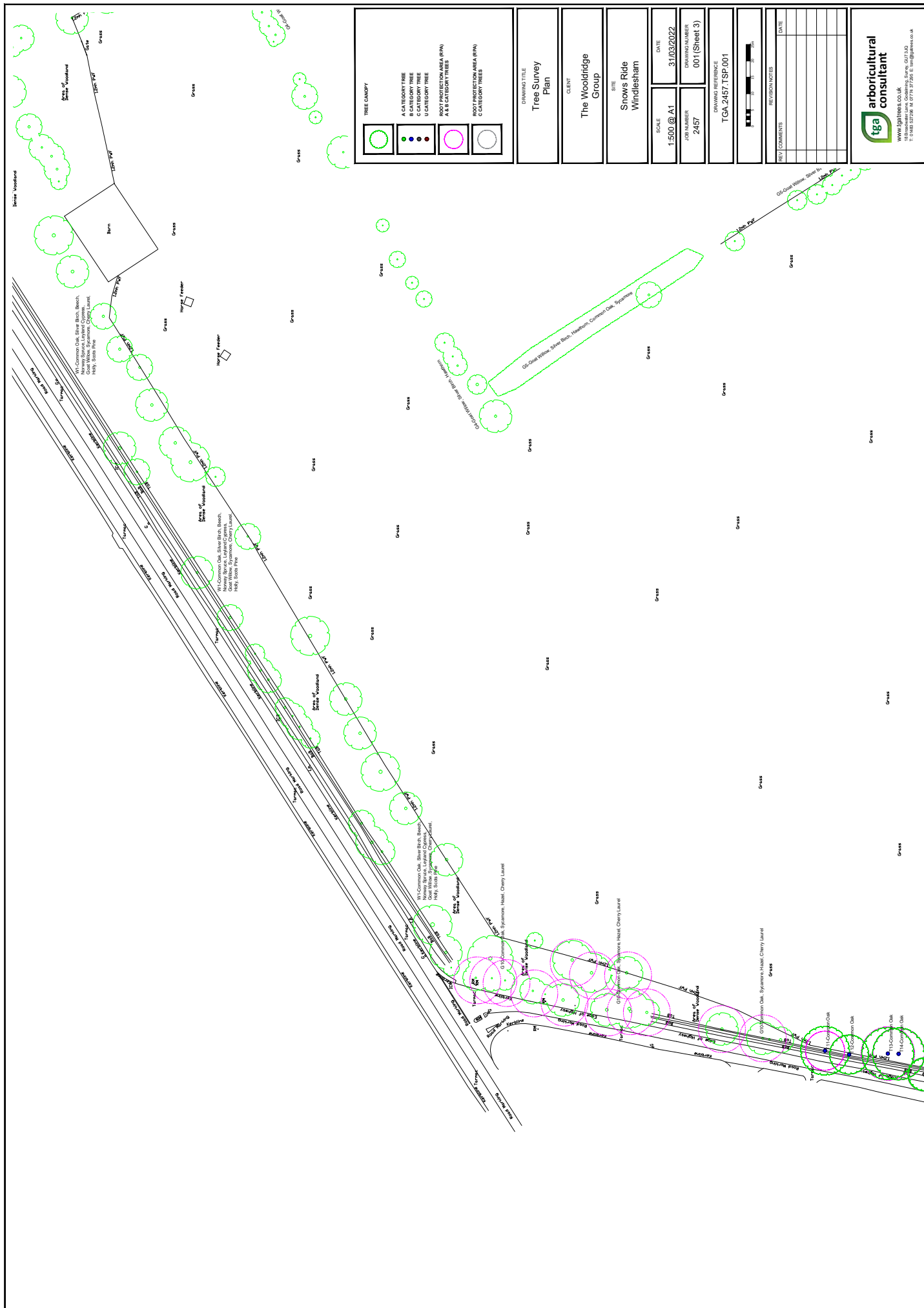
No.	Species	Ht (crown)	Dia (stems)	Crown spread (NESW)	Life stage	ERC	Comments & preliminary recommendations	BS Cat
W1	Quercus robur (Common Oak), Betula pendula (Silver Birch), Fagus sylvatica (Beech), Picea abies (Norway Spruce), X Cupressocyparis leylandii (Leyland Cypress), Salix caprea (Goat Willow), Acer pseudoplatanus (Sycamore), Prunus laurocerasus (Cherry Laurel), Ilex aquifolium (Holly), Pinus sylvestris (Scots Pine)	22(0)	1000(1)	10, 10, 10, 10	M	40+	Woodland group between paddocks and London Road. Mature mixed deciduous trees predominantly Oak, with a smaller proportion of other species. The mature oak are located broadly speaking in two rows, adjacent to the pavement and then another row adjacent to the field further south. Dense understorey of mainly Laurel. High value as screening and landscape buffer next to road. Some A category individual oaks but mainly B category component trees. Understorey trees are C category. Ditch and bank feature adjacent to pavement with oak trees and other trees planted on top of the bank, consistent with a hedge feature which is long lapsed. Sycamore and birch present consistent with self seeding. Bamboo present in areas as invasive. Collectively the group is a constraint to development in arboricultural terms.	B2
G2	Quercus robur (Common Oak), Betula pendula (Silver Birch), Populus tremula (Aspen), Prunus laurocerasus (Cherry Laurel), Crataegus monogyna (Hawthorn), Ilex aquifolium (Holly), Corylus avellana (Hazel)	22(0)	1000(1)	10, 10, 10, 10	M	40+	Group located adjacent to private track. Some mature individual oak A category to 22m height and 1.2m diameter. Also B category oaks. Landscape value as group. Understorey of Holly Hawthorn and laurel planted in linear row consistent with hedge planting but then left to grow unmaintained to a current height up to 12m.	B2

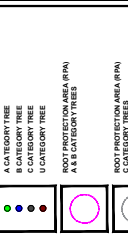
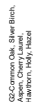
No.	Species	Ht (crown)	Dia (stems)	Crown spread (NESW)	Life stage	ERC	Comments & preliminary recommendations	BS Cat
G3	X Cupressocyparis leylandii (Leyland Cypress)	18(2)	250(1)	5, 5, 5, 5	EM	40+	Conifers planted as large boundary hedge. Value as screening between site and property to South.	B2
G4	Salix caprea (Goat Willow), Betula pendula (Silver Birch), Crataegus monogyna (Hawthorn)	13(0)	300(1)	5, 5, 5, 5	EM	20+	Average estimated dimensions given for group. Stems located on edge of wet ditch. Some value dividing current fields but not significant in the wider landscape. None of the trees on an individual basis are of a quality that would represent a development constraint.	C2
G5	Salix caprea (Goat Willow), Betula pendula (Silver Birch), Crataegus monogyna (Hawthorn), Quercus robur (Common Oak), Acer pseudoplatanus (Sycamore)	13(0)	300(1)	5, 5, 5, 5	EM	20+	Average estimated dimensions given for group. Stems located on edge of ditch. Some value dividing current fields but not significant in the wider landscape. None of the trees on an individual basis are of a quality that would represent a development constraint but collective value as landscape feature.	C2
G6	Quercus robur (Common Oak), Salix caprea (Goat Willow), Acer pseudoplatanus (Sycamore)	15(2)	500(1)	7, 7, 7, 7	M	40+	Maximum estimated dimensions given for group. Group of trees located sporadically on or near boundary. Landscape value as screening.	B2
G7	X Cupressocyparis leylandii (Leyland Cypress)	18(2)	250(1)	5, 5, 5, 5	EM	40+	Conifers planted as large boundary hedge. Offsite planted adjacent to brick wall on boundary. Value as screening between site and property to South.	B2
G8	Acer pseudoplatanus (Sycamore), Betula pendula (Silver Birch)	12(0)	200(1)	4, 4, 4, 4	SM	40+	Offsite trees on other side of brick wall on boundary. Self seeded. Dimensions estimated.	C2
G9	Quercus robur (Common Oak), Betula pendula (Silver Birch)	14(2)	400(1)	8, 8, 8, 8	EM	40+	Maximum estimated dimensions given for group. Landscape value as boundary group. On a linear row next to grass verge adjacent to private driveway beyond boundary. Located on other side of post and wite fence.	B2

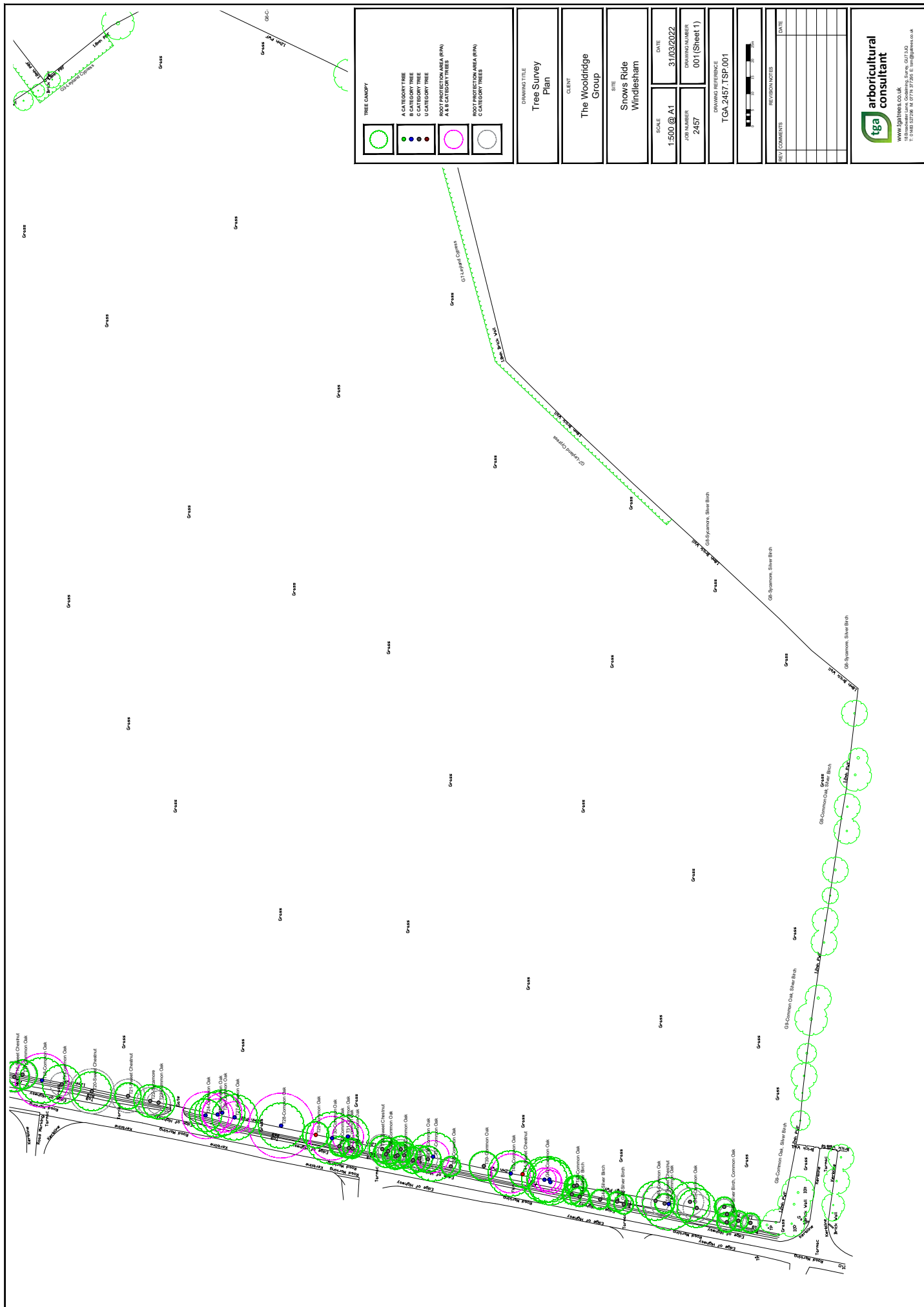
No.	Species	Ht (crown)	Dia (stems)	Crown spread (NESW)	Life stage	ERC	Comments & preliminary recommendations	BS Cat
G10	Quercus robur (Common Oak), Acer pseudoplatanus (Sycamore), Corylus avellana (Hazel), Prunus laurocerasus (Cherry Laurel)	18(0)	600(1)	8, 8, 8, 8	M	40+	Group of mature oak in triangle of land between road and barb wire fence on site interior. Understorey of laurel and rhododendron. Group can be considered an extension of W1 group. Collective value as group and a constraint in development terms.	B2
T11	Quercus robur (Common Oak)	18(5)	500(1)	7.5, 7.5, 7.5, 7.5	M	40+	Twin stem from 1.5m.	B2
T12	Quercus robur (Common Oak)	18(5)	500(1)	6, 6, 6, 6	M	40+	Position estimated as not shown on topo	B2
T13	Quercus robur (Common Oak)	18(5)	680(1)	8, 8, 8, 8	M	40+	Shared canopy with adjacent tree	B2
T14	Quercus robur (Common Oak)	18(5)	660(1)	8, 8, 8, 8	M	40+	Shared canopy with adjacent tree	B2
T15	Acer pseudoplatanus (Sycamore)	15(5)	250, 250, 250(3)	5, 5, 5, 5	EM	20+	Diameters estimated. Triple stem from 1m. Ivy clad	C2
T16	Castanea sativa (Sweet Chestnut)	10(2)	400(1)	4.5, 4.5, 4.5, 4.5	EM	20+	Uneven crown due to competition.	C2
T17	Quercus robur (Common Oak)	10(2)	350(1)	4.5, 4.5, 4.5, 4.5	EM	20+	Uneven crown due to competition.	C2
T18	Quercus robur (Common Oak)	14(5)	690(1)	7, 7, 7, 7	M	40+		B2
T19	Quercus robur (Common Oak)	13(2)	300(1)	6, 6, 6, 6	EM	40+	Uneven crown due to competition	C2
T20	Castanea sativa (Sweet Chestnut)	10(2)	300, 200, 200, 400(4)	6, 6, 6, 6	EM	10+	Multistern tree with congested stems and damage to main stem.	C2
T21	Castanea sativa (Sweet Chestnut)	10(2)	350, 200, 150(3)	4, 4, 4, 4	EM	10+	Multistern tree with congested stems and damage to main stem.	C2
T22	Acer pseudoplatanus (Sycamore)	10(2)	200, 200, 200(3)	5, 5, 5, 5	EM	10+	Multistern tree self seeded low quality	C2

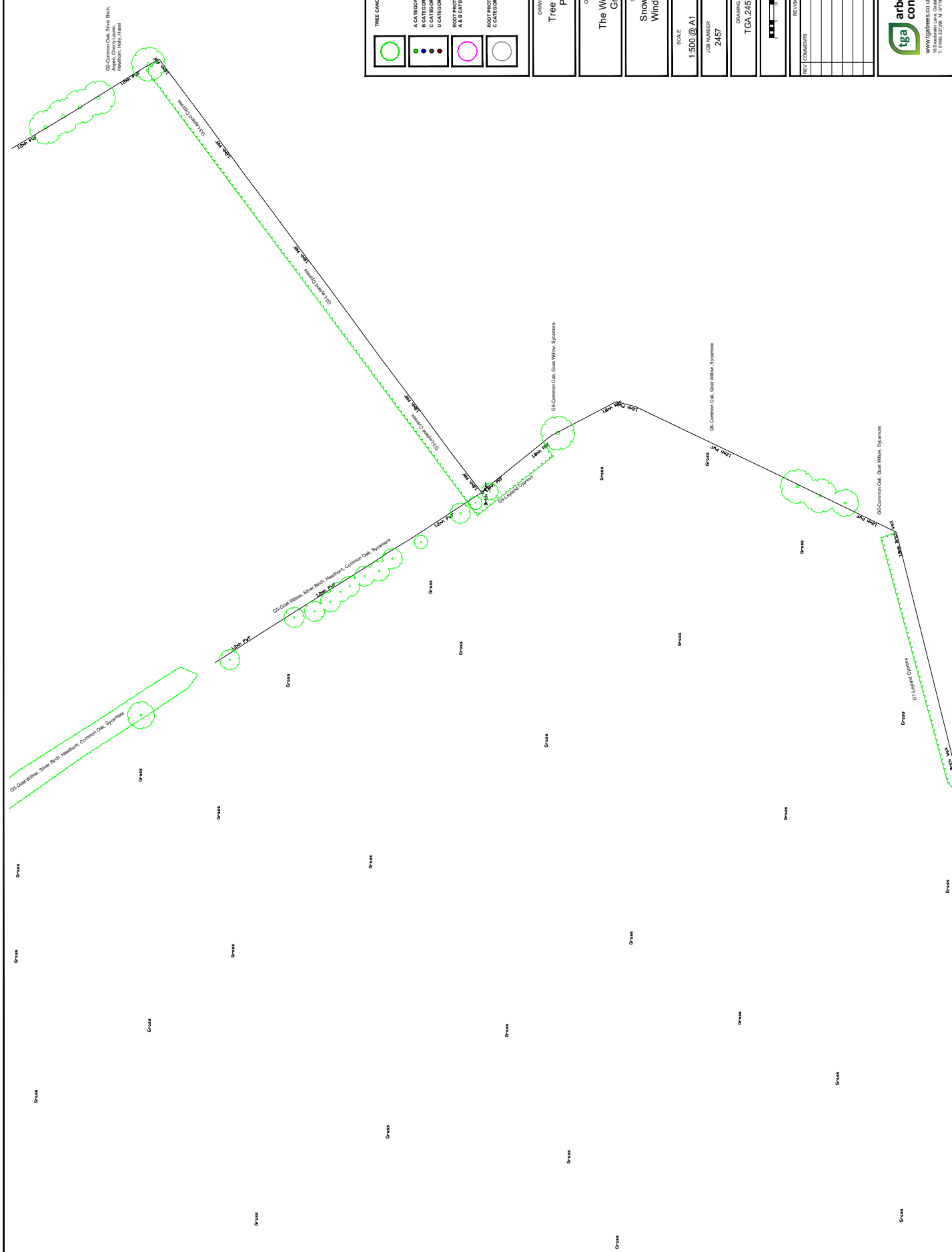
No.	Species	Ht (crown)	Dia (stems)	Crown spread (NESW)	Life stage	ERC	Comments & preliminary recommendations	BS Cat
T23	Quercus robur (Common Oak)	10(5)	300(1)	5, 5, 5, 5	EM	20+	Leaning tree uneven crown	C2
T24	Quercus robur (Common Oak)	16(5)	600(1)	5, 5, 5, 5	M	40+	Uneven crown	B2
T25	Quercus robur (Common Oak)	16(5)	400(1)	7, 7, 7, 7	EM	40+	Shared canopy with adjacent tree	B2
T26	Quercus robur (Common Oak)	16(5)	500(1)	7, 7, 7, 7	EM	40+	Shared canopy with adjacent tree	B2
T27	Quercus robur (Common Oak)	16(5)	400(1)	7, 7, 7, 7	EM	40+		B2
T28	Quercus robur (Common Oak)	16(5)	830(1)	7, 7, 7, 7	M	40+	Position measured in relation to other trees on topo	B2
T29	Quercus robur (Common Oak)	5(0)	600(1)	4, 4, 4, 4	OM	<10	Fallen tree	U
T30	Quercus robur (Common Oak)	16(5)	560(1)	8, 8, 8, 8	M	40+		B2
T31	Quercus robur (Common Oak)	16(5)	400(1)	6.5, 6.5, 6.5, 6.5	EM	40+		B2
T32	Quercus robur (Common Oak)	12(5)	250(1)	3, 3, 3, 3	SM	40+		C2
T33	Quercus robur (Common Oak)	12(5)	250(1)	3, 3, 3, 3	SM	40+		C2
T34	Quercus robur (Common Oak)	12(5)	250(1)	3, 3, 3, 3	SM	40+		C2
T35	Castanea sativa (Sweet Chestnut)	8(2)	200, 200, 200, 150(4)	4, 4, 4, 4	EM	20+		C2
G36	Quercus robur (Common Oak)	12(5)	250(1)	4, 4, 4, 4	SM	20+	Average estimated dimensions given for group. Self seeded on bank.	C2
T37	Quercus robur (Common Oak)	13(5)	410(1)	7.5, 7.5, 7.5, 7.5	EM	20+	Uneven crown	B2
T38	Quercus robur (Common Oak)	8(2)	150, 150(2)	3, 3, 3, 3	SM	10+	Twin stem ivy infested	C2





No.	Species	Ht (crown)	Dia (stems)	Crown spread (NESW)	Life stage	ERC	Comments & preliminary recommendations	BS Cat
T39	Quercus robur (Common Oak)	8(2)	360(1)	4.5, 4.5, 4.5, 4.5	SM	40+		C2
T40	Quercus robur (Common Oak)	14(2)	500(1)	7, 7, 7, 7	EM	40+		B2
T41	Castanea sativa (Sweet Chestnut)	12(5)	200, 200, 300(3)	4, 4, 4, 4	EM	<10	Moribund. Position estimated	U
G42	Quercus robur (Common Oak)	16(2)	300(1)	7, 7, 7, 7	SM	40+	Diameters estimated. Growing in group with shared canopy	B2
T43	Quercus robur (Common Oak)	16(2)	250(1)	3, 3, 3, 3	SM	40+		C2
G44	Betula pendula (Silver Birch)	14(5)	250(1)	3, 3, 3, 3	EM	20+	Some positions estimated. Average estimated dimensions given for group	C2
G45	Quercus robur (Common Oak)	14(5)	350(1)	6, 6, 6, 6	EM	40+	Self seeded oaks with similar dimensions	C2
T46	Castanea sativa (Sweet Chestnut)	10(5)	350(1)	3, 3, 3, 3	EM	10+	Suppressed	C2
T47	Quercus robur (Common Oak)	16(5)	670(1)	8, 8, 8, 8	M	40+		B2
G48	Betula pendula (Silver Birch), Quercus robur (Common Oak)	12(2)	200(1)	3, 3, 3, 3	SM	20+	Understorey trees. Some positions estimated	C2









	<p>TREE CANOPY</p>
	<p>A CATEGORY TREE B CATEGORY TREE C CATEGORY TREE U CATEGORY TREE</p>
	<p>ROOT PROTECTION AREA (RPA) A & B CATEGORY TREES</p>
	<p>ROOT PROTECTION AREA (RPA) C CATEGORY TREES</p>

DRAWING TITLE

**Tree Survey
Plan**

CLIENT

The Wooldridge Group

SITE
Snows Ride
Windlesham

SCALE	DATE
1:500 @ A1	31/03/2022

DRAWING REFERENCE
TGA.2457.TSP.001

REVISION NOTES		DATE
REV	COMMENTS	

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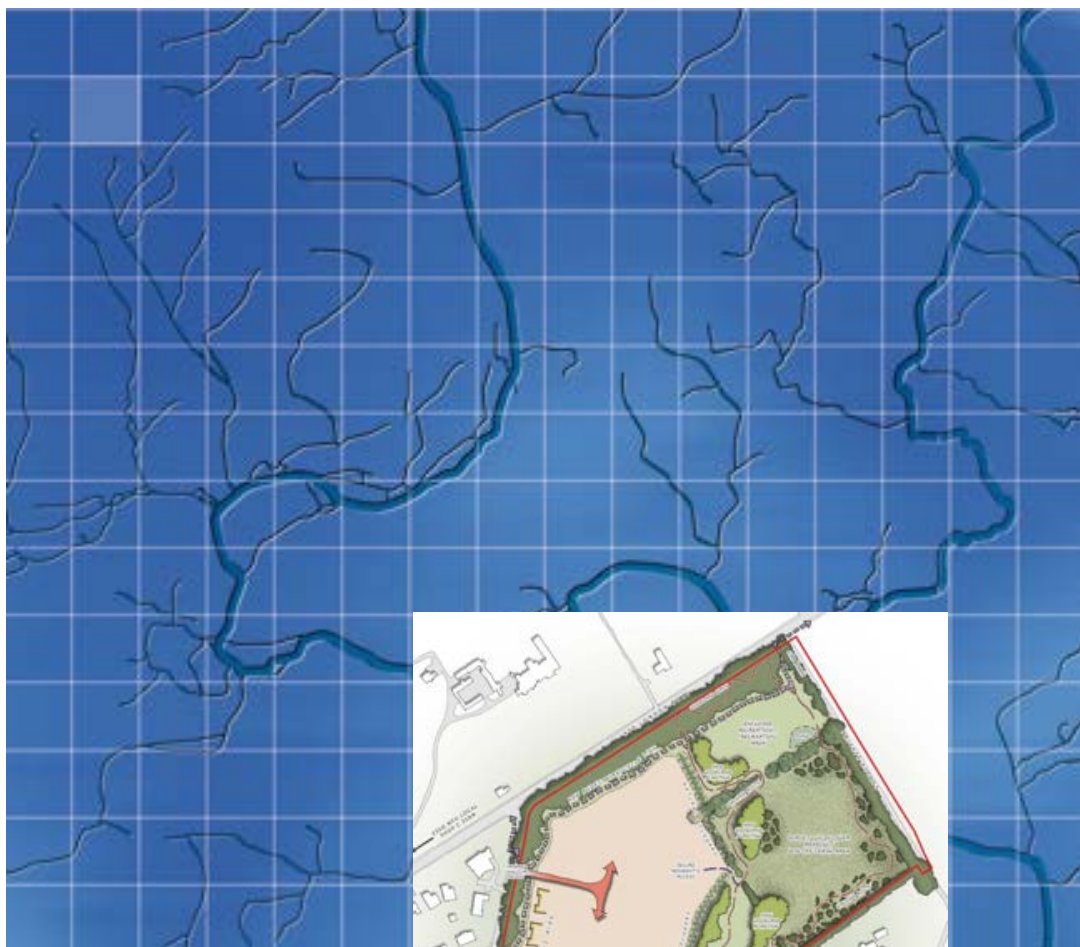
Appendix 6 – Initial Flood Review and SuDS Strategy

The Wooldridge Group

May 2022

Initial Flood Review and SuDS Strategy

Proposed Care Village and SANG Allocation, Snows Ride, Windlesham



WHS

The Wooldridge GroupThe Wooldridge Group

Initial Flood Review and SuDS Strategy

Document issue details

WHS1939

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1.0	29/04/2022	Draft	Daniel Murtagh (Consultant)	Brett Park (Principal Consulatnt)
1.1	06/05/2022	Final	Daniel Murtagh (Consultant)	Brett Park (Principal Consulatnt)

For and on behalf of Wallingford HydroSolutions Ltd.

This report has been prepared by WHS with all reasonable skill, care and diligence within the terms of the Contract with the client and taking account of both the resources allocated to it by agreement with the client and the data that was available to us. We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above. This report is confidential to the client and we accept no responsibility of any nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.



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WHS

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Initial Flood Review and SuDS Strategy

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Appendix A – BGS SuDS Report

Appendix B – Thames Water Pre-Planning Enquiry Response

1 Introduction

1.1 Background

WHS have been instructed by The Wooldridge Group to support the promotion of a 16ha development site to the east of Snows Ride, Windlesham, in Surrey Heath Borough. The scope of work includes leading on the flood risk and drainage strategy for this site. The current proposal for the land is a c.5.5ha care village, and c.10ha of SANG/ recreation land.

1.2 Site Location

This site is located adjacent to Snows Ride and London Road in Windlesham, Surrey Heath (NGR: 493180, 165195). The location is an existing greenfield site, see Figure 1 for a Site Location Map.



Figure 1 - Site Location Map

1.3 Sources of Information

The main sources of information for this assesment include:

- EA Flood Mapping¹
- The British Geological Survey (BGS) Infiltration SuDS GeoReport²
- 2m Lidar Data³
- Soilscales Online Map⁴

¹ Environment Agency Fluvial Flood Maps. Available at: <http://maps.environment-agency.gov.uk>. Accessed March 2022.

² British Geological Society (BGS), (2021). Infiltration SuDS GeoReport. BGS_325461_33121.

³ Survey Open Data available at: <https://environment.data.gov.uk/DefraDataDownload/?Mode=survey>. Accessed March 2022.

⁴ Soilscales Online Map. Available at: <http://www.landis.org.uk/soilscales/index.cfm>. Accessed April 2022.

2 Flood Risk

2.1 Fluvial and Pluvial Flood Risk

The Environment Agency's (EA) flood map shows that the site is not at risk of fluvial flooding, Figure 2. Although there is no risk of fluvial flooding at the site, there is a risk of surface water flooding in the areas to the north-east and south-west of the site where the topography is naturally lower.

There is no proposed infrastructure located in the surface water flood zones, however, they will be managed with green infrastructure to control and attenuate flows leaving the site.

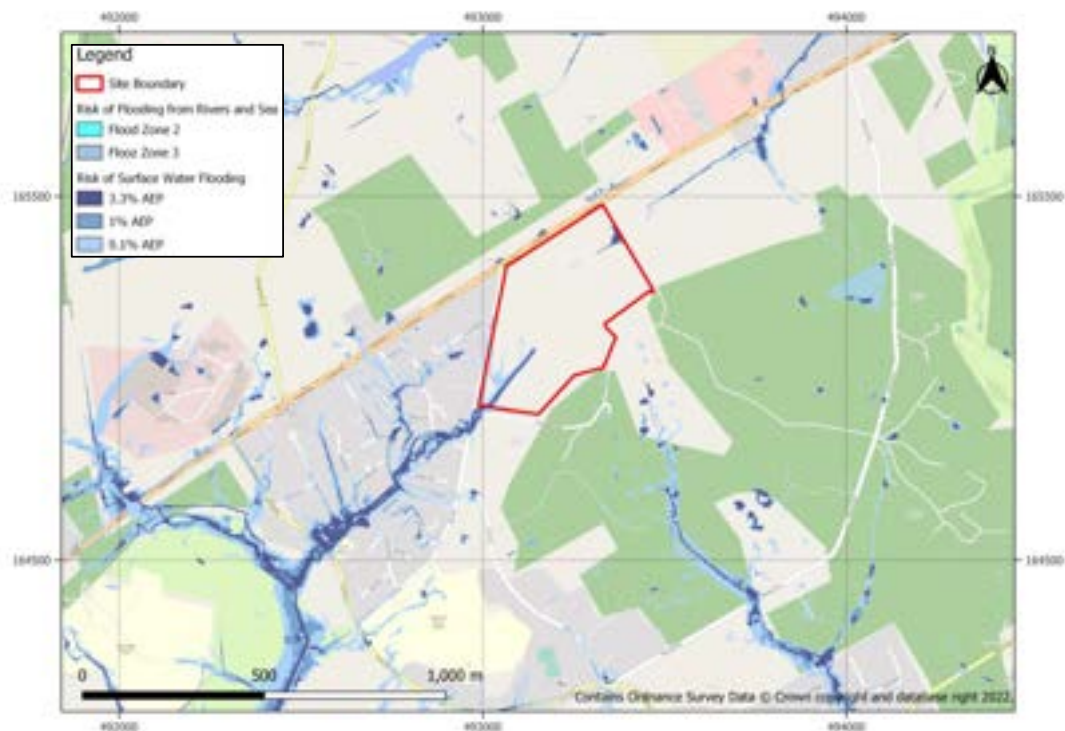


Figure 2 – EA Flood Map, Surface Water Flood Risk

2.2 Historical Flooding

No records of flooding at the site are recorded within the EA's historic flood map.

2.3 Ground Water Flood Risk

Groundwater flooding is defined as the emergence of groundwater at ground level. The BGS SuDS report states the depth to groundwater is likely to be less than 3m below the ground surface for at least part of the year.

A review of Soilscape's online mapping service has indicated that the majority of the site lies on slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils. This means that there is impeded drainage to the majority of the site.

For these soils and given the topography of the site, it is concluded groundwater flooding should be considered a risk, although manageable within the design of development levels.

3 Outline SuDS Strategy

3.1 SuDS Hierarchy

To ensure that surface water run-off from the site does not result in an increase in flood risk, the management of run-off has been considered using a sequential approach, in line with current guidance.

The following options for the disposal of surface water run-off were considered, in order of preference;

- Infiltration systems - Surface water drainage should discharge to a soakaway or other infiltration device where ground conditions are favourable.
- Attenuated discharge to a watercourse – Surrey Heath Burrough Council will require the rate of discharge to be attenuated to the existing greenfield run-off rates for the site, to prevent any increase in runoff and minimise the risk of increased flooding downstream.
- Attenuated discharge to a surface water sewer – where other forms of outlet are not achievable discharge should be made to a sewer.
- Attenuated discharge to a combined sewer – this is the least favorable option and should only be considered when all other options have been exhausted.

3.2 Infiltration Potential

The BGS SuDS Report suggests that the infiltration potential for the majority of the site has significant constraints, this is due to the following main issues:

- Superficial deposits are likely to be poorly draining.
- Groundwater is likely to be less than 3m below ground surface for at least part of the year.

It is concluded that infiltration at this site is unlikely to be a viable option, however, this should be confirmed with infiltration testing during the detailed design stage of this project. The BGS SuDS report can be seen in full in Appendix A.

3.3 Antennuated Discharge into a Watercourse Potential

Along the western boundary of the site there is a small drainage ditch which discaheges into a small pond, Figure 3. This pond has a culverted outlet and it is likely that it discharges into a Thames Water surface water sewer.

The capacity of this existing ditch is likely to be insufficient for the proposed development and as such, it would likely need to be enlarged in order to accommodate the proposed development. This may not be possible due to it being located off site.

As such attenuated discharge into this existing ditch is unlikely to be a feasible option unless permission form the existing land owners is obtained to improve the performance of the ditch, pond and outlet culvert.

Regardless of whether this is a feasible option or not, surface water run-off will eventually discharge into the existing surface water sewer.

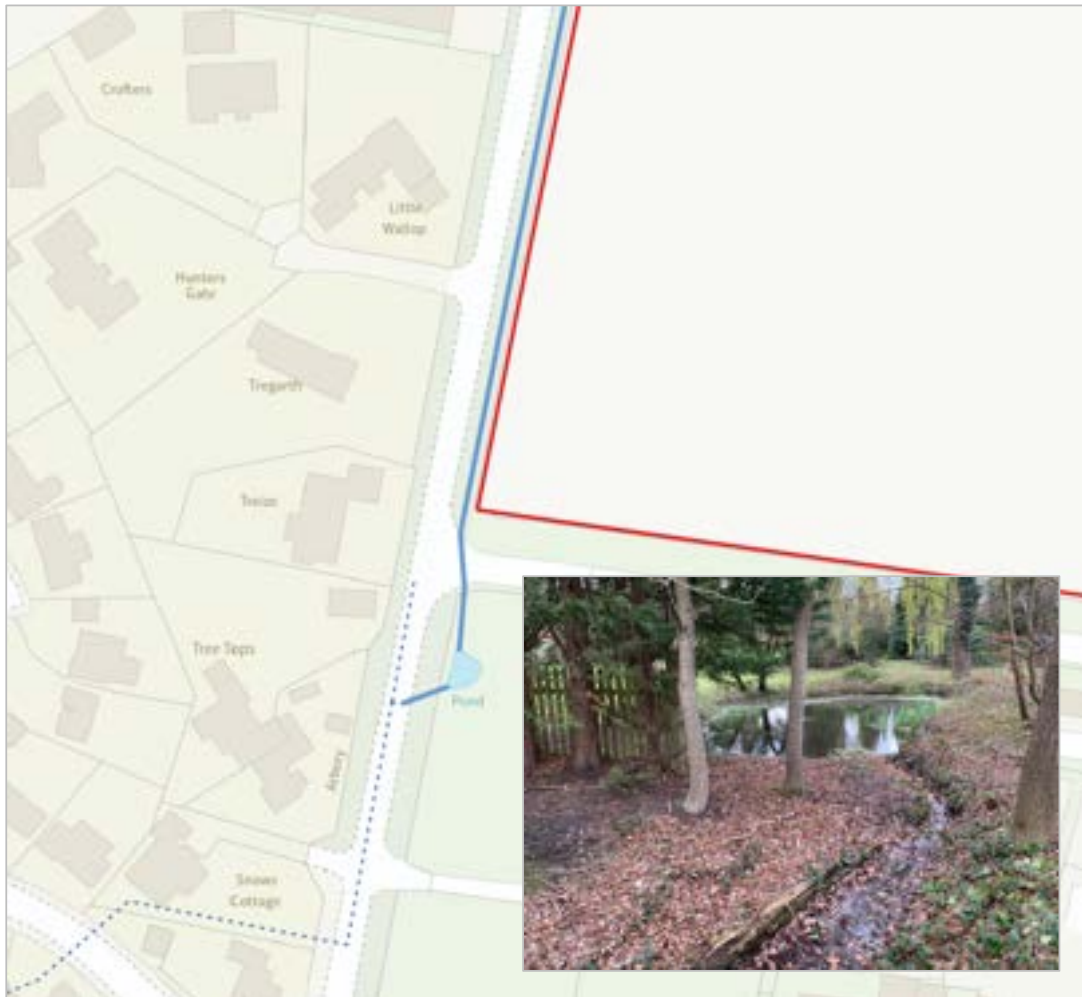


Figure 3 – Location of existing drainage

3.4 Preferred Option (Assuming connectivity can be verified)

Figure 4 shows an outline SuDS strategy taking into consideration the natural topography of the site. There is a natural decrease towards the centre of the site that falls to the north-east and south-west corners of the site, this coincides where the surface water run-off accumulates. The outline drainage design plan follows the natural fall in topography to utilise open swales as much as possible. This is the preferred solution.

Surface water run-off will then be attenuated in an attenuation basin in the south-west corner of the site, before being discharged at a controlled rate into the existing surface water sewer. This will either be through a new connection into the sewer or via the existing open ditches and small pond described in Section 3.3.



Figure 4 – Outline SuDS Strategy

3.5 Storage Estimate

Table 1 shows an estimate of the likely attenuation storage requirement for the proposed development, assuming a developed impermeable area of 35% of the site which is designated for development (5.5 ha) from the concept plan (WOOL.220202_CSM-01_R2).

Storage volumes have been estimated using Causeway's Flow software with FEH13 rainfall. The final volume will depend on the efficiency of the outflow device, this will be confirmed at the detailed design stage. However, a vortex flow control device is used at the outlet of attenuation ponds to discharge the outflow to the local network at the existing greenfield rate, for this estimate and to be conservative, this has been taken as Qbar.

Table 1. Comparison of the different areas required for the proposed attenuation pond.

Percentage of the site as Impermeable Area	*Attenuation Storage Area (m ²)
Expected Storage (35% of 5ha Developed Area)	1,400 to 1,700

**Based on a 1m depth attenuation pond*

Table 1 shows the required storage area, the attenuation pond will be oversized in order to provide betterment through reduced run-off rates from the site.

3.6 Sewer Connection (Thames Water Enquiry)

Thames Water have confirmed there is sufficient foul water capacity at this site for the proposed development – see Appendix B for full details. Should there be any changes to the design, Thames Water should be consulted to confirm sufficient capacity is available in their system.

Following confirmation that infiltration is not a viable option, Thames Water will confirm the option of discharging into the existing surface water sewer network. This surface water drainage proposal will need to be agreed in principle by the Lead Local Flood Authority before Thames Water will review the proposal and provide comments on the restricted discharge rate.

Given that it is proposed that the scheme will reduce greenfield run-off rates, it is anticipated that discharge into the existing surface water sewer will be a feasible option.

4 Conclusions

Initial Flood Review:

- This type of development is classed as 'more vulnerable' by the NPPF and all guidance on this type of development should be followed.
- Parts of this site are at a high risk of surface water flooding according to the EA flood maps.
- This site is not at fluvial flood risk.
- There are plenty of safe access and egress routes to and from the site along Snobs Ride Road and London Road.

SuDS Strategy:

- Based on the Non-Statutory Technical Standards for Sustainable Drainage Systems, S2 states "For greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1 in 1-year rainfall event and the 1 in 100-year rainfall event should never exceed the peak greenfield runoff rate for the same event".
- S4 in the Non-Statutory Technical Standards for Sustainable Drainage Systems also states "Where reasonably practicable, for greenfield development, the runoff volume from the development to any highway drain, sewer or surface water body in the 1 in 100 year, 6-hour rainfall event should never exceed the greenfield runoff volume for the same event".
- An attenuation pond for the 100yr + central climate change results in an approximate area of 902 m² for an estimated impermeable area of 35%. This area for the attenuation storage is to be confirmed in the detailed design stage following confirmation of infiltration rates, detailed pond size calculations, discharge rates, required design event, freeboard and urban creep allowance.
- The attenuation pond will be oversized in order to provide betterment through reduced runoff rates from the site.
- The initial concept plan suggests that ground raising may not be required, and drainage will follow a gravity drainage system to the southwest corner where the attenuation pond is located (to be confirmed).
- SuDS designs will most likely be constrained by shallow groundwater levels across the site.
- Thames Water have confirmed there is capacity in their Foul Water sewage network for this development.

Appendix A – BGS SuDS Report

Appendix B – Thames Water Pre-Planning Enquiry Response



Mr Daniel Murtagh

Wallingford HydroSolutions
Castle Court,
6 Cathedral Road,
Cardiff,
CF11 9LJ



22 April 2022

Pre-planning enquiry: Confirmation of sufficient capacity

Site: Windlesham, London Road, Surrey Heath, Surrey - GU20 6PJ

Dear Daniel,

Thank you for providing information on your proposed development.

Proposed site: Housing (100 units).

Proposed foul water discharge by gravity (assumed) into manhole SU92649901 or into manhole SU93652401.

Proposed surface water via soakaways and not to Thames Water sewer network.

We're pleased to confirm that there will be sufficient foul water capacity in our sewerage network to serve your development.

This confirmation is valid for 12 months or for the life of any planning approval that this information is used to support, to a maximum of three years.

You'll need to keep us informed of any changes to your design – for example, an increase in the number or density of homes. Such changes could mean there is no longer sufficient capacity.

What happens next?

Please make sure you submit your connection application, giving us at least 21 days' notice of the date you wish to make your new connection/s.

If you've any further questions, please contact me on [REDACTED]

Kind Regards

Zaid Kazi

Developer Services – Major Projects, Project Engineer

[REDACTED]

Get advice on making your sewer connection correctly at connectright.org.uk

Clearwater Court, Vastern Road, Reading, RG1 8DB

Find us online at developers.thameswater.co.uk

Appendix 7 – Landscape and Green Belt Statement

Land off Snows Ride, London Road, Windlesham, Surrey LANDSCAPE & GREEN BELT STATEMENT

on behalf of Wooldridge Group
April 2022



-	DRAFT	FC	AS	JBA	30/03/22
Revision	Purpose	Originated	Checked	Authorised	Date
Document Number: JBA 22/105- Doc 1		Document Reference: LANDSCAPE AND GREEN BELT STATEMENT Land at Snows Ride, Windlesham, Surrey			
		JAMES BLAKE ASSOCIATES			

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1. INTRODUCTION

1.1 Background

1.1.1 James Blake Associates Ltd has been instructed by The Woodbridge Group to complete a Landscape and Green Belt Assessment of land east of Snows Ride, Windlesham. The purpose of the exercise is to assess the contribution the land makes to purposes of the Green Belt, and examine the landscape factor of relevance, to determine the scope for development, and the opportunity for creation of a new defensible Green Belt boundary.

1.1.2 This Assessment concerns the Site at Windlesham which is enclosed by existing mature trees and hedgerows at the boundaries. It is situated at the eastern edge of existing residential settlement along Snows Ride, with a small collection of residential properties to the south and south east, off Windlesham Court. The north of the Site is formed by London Road (A30), beyond this to the north east is a small commercial development, comprised predominantly of garden centers and other stores of a similar nature. To the east of the Site is a large, mature woodland with a couple of private residential properties in the woodland located within it. Large areas of woodland surrounding areas of settlement extends beyond the Site boundaries. The Site location is shown on **Figure 1**. The proposals for the Site comprise a 5.5ha care village and 10ha of Suitable Alternative Natural Greenspace (SANG) and recreational land for the local community.

1.1.3 Scope

1.1.4 This document and supporting photographs provide a detailed assessment of the Site, the potential impact of development on landscape quality, biodiversity and wildlife, and its contribution to the purposes of the Green Belt, as set out in the National Planning Policy Framework (NPPF).

1.1.5 This Statement has been prepared with reference to the National Planning Policy Framework, the Surrey Heath Borough Local Plan (December 2000) and the Surrey Heath Borough Draft Local Plan (2022) and associated relevant Evidence Base documents.

1.1.6 Whilst it is acknowledged that these documents are crucial in assessing the potential suitability of sites for much needed residential, commercial and other development, it is perhaps only after more extensive studies on specific sites that the potential of mitigation from sensitive siting and design considerations can be explored in more detail. These considerations can determine how successfully development can integrate into sites that, until now, were conceived as being too sensitive or contrary to policies – such as the Green Belt or that were thought of as strategic to prevent coalescence.

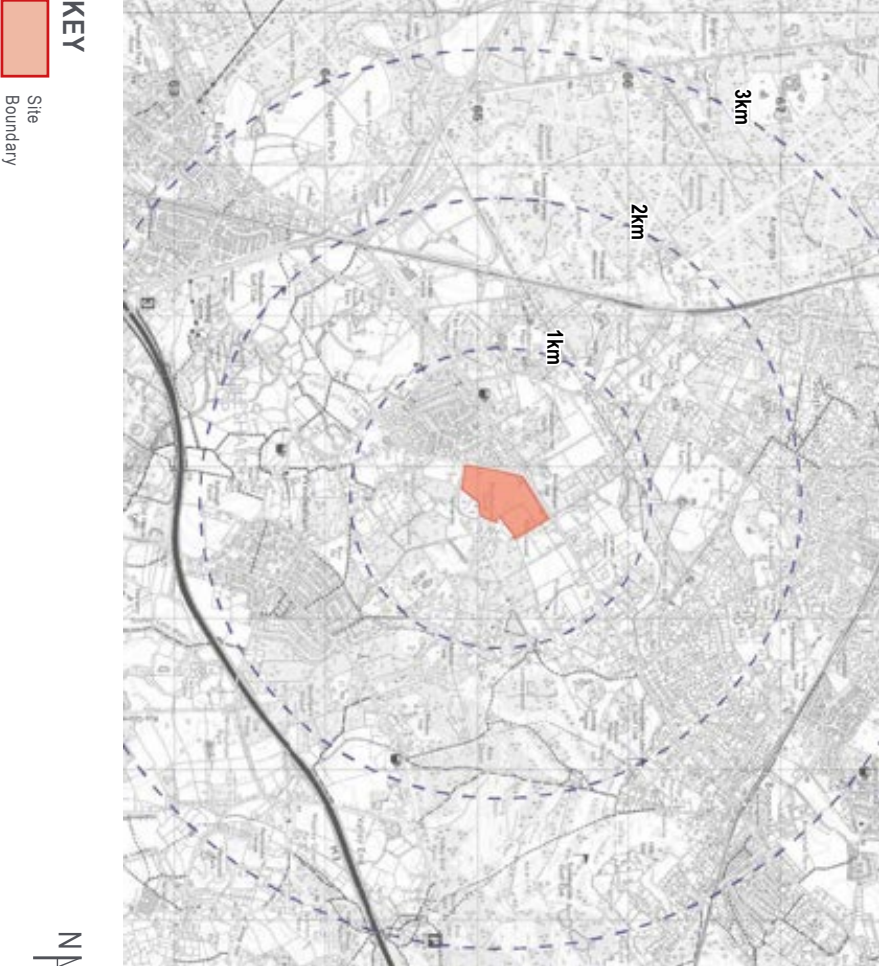


Figure 1: Site Location Plan. Not to Scale
Source: Ordnance Survey Crown Copyright 2022. All rights reserved. License Number 100022432

2. POLICY CONTEXT

2.1 General Policy Matters

2.1.1 The development of the Site needs to be considered against national and local planning policy context. Policies and advice contained within the following documents (and supporting Supplementary Planning Documents) have been reviewed:

- National Planning Policy Framework (July 2021);
- Surrey Heath Borough Local Plan (December 2000) and Draft Local Plan (2022);
- Planning Policy Evidence Base Documents:
- Surrey Heath Borough Landscape Character Assessment, April 2015;
- Surrey Heath Landscape Sensitivity Assessment, July 2021;
- Surrey Heath Green Belt Review (2019-2039), January 2022;
- Surrey Heath Local Plan Appraisal of Sites, Green Belt Sites, March 2018.

2.2 National Planning Context

2.2.1 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The NPPF sets out a clear presumption in favour of sustainable development. There are three dimensions to sustainable development: economic, social and environmental.

2.2.2 NPPF Section 13: Protecting Green Belt land states that 'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.'

2.2.3 Green Belt is considered to perform five purposes:

- 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.

2.2.4 The NPPF emphasises in Paragraph 140 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It goes on to state that 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans'.

2.2.5 Paragraph 147 of the NPPF states, as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

2.2.6 Paragraph 141 of the NPPF states that: 'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimise's the density of development... including whether policies promote a significant uplift in minimum density standards in town and city centers and other locations well served by public transport; and
- c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground'.

2.2.7 Paragraph 143 of the NPPF provides guidance for local planning authorities when defining Green Belt boundaries. A key aspect is ensuring the permanence of the Green Belt is secured using physical features that are readily recognisable and likely to be permanent.

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

Landscape and Design

2.2.9 NPPF Section 12: Achieving Well-Design Places sets out that good quality and inclusive design is a key aspect of sustainable development. As such all new developments should 'function well and add to the overall quality of the area...,' 'establish a strong sense of place...,' 'optimise the potential of the site to accommodate development, creating and sustaining an appropriate mix of uses (including green and other public space),' 'respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation,' and 'be visually attractive as a result of good architecture and landscaping'. These principles are supported by NPPG 26: Design.

2.2.10 Trees are also highlighted as making an important contribution to the character and quality of urban environments, helping to mitigate and adapt to climate change. 'Planning policies and decisions should ensure that new streets are tree-lined'.

Housing Need and Supply

2.2.11 Section 5 of the NPPF, Delivering a sufficient Supply of Homes, states that local planning authorities should have a clear understanding of housing needs in their area:

- Strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.
- Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:
 - a) specific, deliverable sites for years one to five of the plan period; and
 - b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.

The Natural Environment

2.2.12 Section 15 of the NPPF sets out the principles to conserve and enhance the natural and local environment, including the protection and enhancement of valued landscapes (para. 174.) Local planning authorities should subsequently set criteria based policies against which proposals for any development on or affecting protected landscape areas will be judged. A distinction should be made in the hierarchy of designated sites so that the level of protection is commensurate with their status and gives appropriate weight to their importance (para. 175).

2.3 Borough Wide Policy

2.3.1 The Surrey Heath Borough Council Local Plan (2019-2038) is currently out for consultation and due to be adopted in December 2023. It will be the key document that provides the framework to guide the future development in the Borough of Surrey Heath. It sets out a vision and objectives and includes policies for managing development and infrastructure.

2.3.2 **Surrey Heath BC Policy E1 – Thames Basin Heaths Special Protection Area:** The following extract from E1 is useful: 'The Council will only permit development where satisfied that this will not give rise to likely significant adverse effect on the integrity of the Thames Basin Heaths Special Protection Area (SPA) whether alone or in combination with other development...Net new residential development will not be permitted within the exclusion zone, set at 400m linear distance from the SPA boundary...All new residential (net) development within 5km of the Thames Basin Heaths Special Protection Area is considered to give rise to the possibility of likely significant effect. Where one or more adverse effects on the integrity of the SPA will arise, measure to avoid and mitigate these effects must be delivered and secured in perpetuity and be subject to an Appropriate Assessment.'

2.3.3 The Site is located outside of the 400m exclusion zone but within 5km of the Thames Basin Heaths SPA. The Local Plan also notes appropriate measures that can mitigate effects on the SPA, these include '...a) all net new residential development will provide or contribute toward the provision of Suitable Alternative Natural Greenspace (SANG). b) SANGs will be provided at a standard of at least 8ha per 1,000 new occupants. c) developments of 10 or more net new dwellings will only be permitted within the identified catchment areas of SANG.'

2.3.4 **Surrey Heath BC Policy E3 – Biodiversity Net Gain:** the Policy E3 of the Local Plan states 'Development proposals will be permitted where they can demonstrate the provision of a minimum 20% increase in biodiversity units when set against the baseline biodiversity value...This may include the creation, restoration, enhancement and subsequent maintenance habitats and features.'

2.3.5 The main objectives of this Policy is to meet the national guidance for BNG as set out in the NPPF. BNG should be integrated into the design of a site through the provision of new wildlife habitats, but may also include off-site biodiversity enhancement of green networks.

2.3.6 **Surrey Heath BC Policy E7 – Landscape Character Assessment:** the following extract from Policy E7 notes '1) development proposals will be permitted which respond to and wherever possible enhance the special character. Key positive landscape attributes, value and landscape setting of settlements. 2) Development proposals should demonstrate that: a) they can integrate with, and positively contribute to the landscape character of the area; b) they are sited and designed so as to avoid any adverse impact on key positive landscape attributes identified in relevant Landscape Character Assessments and Landscape Sensitivity Studies; c) they are sites and designed to minimise landscape and visual impacts. In line with the analysis, guidance and strategies provided in relevant Landscape Character Assessments and Landscape Sensitivity Studies...'

2.3.7 **Surrey Heath BC Policy GBC1 – Development of new buildings within the Green Belt:** the GBC1 policy identified that '...limited infilling may be acceptable within the Green Belt outside of defined settlement areas as designated on the Policies Map where it can be demonstrated that the site should be considered to be within the village...'

2.3.8 The policy goes on to state that 'The council will encourage scheme that result in environmental and landscape improvement, enhance biodiversity and nature conservation, and support better accessibility by sustainable means.'

2.4 Surrey Heath Borough Council Planning Policy Evidence Base Documents

2.4.1 There are a number of technical background documents which support the Local Plan. The development of the evidence base is an ongoing process and new documents are added when they become available. Those of particular relevance to the proposed Site to the east of Snows Ride, Windlesham are reviewed in further detail as set out below.

2.4.2 The aim of the **Surrey Heath Local Plan Appraisal of Sites, 2018**, was to undertake a comprehensive review of the sustainability of a number of development sites outside of the defined settlement boundaries but within the Green Belt of

the Surrey Heath Borough. The proposed Site is located within the parcel WIN6 (809). Refer to **Figure 2**. The assessment for the parcel notes that 'A significant number of homes could potentially be accommodated on the site as it has no physical constraints...The site is well-located for secondary schools and bus stops.' It also describes the parcel as having a moderate landscape sensitivity to housing development.

2.4.3 **The Surrey Heath Landscape Sensitivity Assessment, 2021**, considers the sensitivity of different landscapes within the Surrey Heath Borough to residential development, the document uses the defined Landscape Character Areas (LCA) for the Surrey Heath Borough to form the base of the assessment. The Landscape Sensitivity Assessment considers both landscape and visual aspects of sensitivity which includes: Landform, Landscape pattern and time depth, Natural character, Built character, Recreational value, Perceptual aspects, and Settlement setting.

2.4.4 The Site is within LCA S6a, Windlesham Settled and Wooded Sandy Farmland and within sub area S6a, settlement edges north and east of Snows Ride. The key characteristics of LCA S6a are described within the **Surrey Heath Landscape Character Assessment** section of this report. The sensitivity evaluation for the area identifies that the area has a 'gently undulating landform. The area features some modern built development, including nurseries, garden centers and large-scale research institutes/laboratories to the north-west of the A30. The landscape is visually enclosed by woodland and boundary vegetation which substantially limits views.' all of these as well as the lack of public access, create a lower sensitivity rating. The surrounding woodland is noted to carry a higher value of sensitivity.

2.4.5 The sub area of S6a (refer **Figure 3**) typically comprises pastoral fields and paddocks set within woodland, interspersed with existing built development and transport networks. In addition to this there is a distinct lack of historic features and limited public access. The strong wooded areas around the settlements creates a green backdrop, enclosing views into and out of the area. The overall sensitivity rating for S6a is Moderate.

2.4.6 The Landscape Sensitivity Assessment notes three key points for potential mitigation in the S6a area. These are:

- 'Be designed to retain tree cover that is essential to the character of this area and consider opportunities for new woodland planting to help integrate new development within the landscape.'
- 'Avoid having an urbanising effect along London Road or Snows Ride through the use of appropriate surfacing, the minimising of street clutter and the use of traditional signage with regard to local style and materials.'
- 'Be sited carefully to relate to existing settlement pattern and retain the individual identity of the settlement. This will ensure that is perceived as being part of Snows Ride rather than piecemeal development along roads and will help avoid a sense of merging with Sunningdale.'

2.4.7 Recommendations for potential enhancement strategies include:

- Enhancing the varied woodland plantations, belts and copses and degraded hedgerows, through additional planting of locally prominent species and by promotion traditional woodland management techniques and regimes with land owners.
- Introducing recreational access into the local area and enhancing connections through new footpath and cycleway along London Road and Snows Ride.
- Restoration of historic hedgerows

2.4.8 **The Surrey Heath Borough Council Green Belt Review (2022)** and **Green Belt review Sustainability Assessment (2022)** the Green Belt was assessed in its entirety, split across different parcels. The performance of each individual parcel was assessed against four of the five Purposes, with parcels further refined through additional considerations relating to development constraints. The intention of Green Belt Review (Sustainability Assessment), is more refined and focused to complement the Green Belt Review, Main Document, 2022. The study highlights the accessibility of the various Green Belt parcels to public transport and local facilities.

2.4.9 The purpose of a Green Belt Review is to provide evidence of how different areas perform against the Green Belt purposes set out in national policy. Planning authorities may then take this into account alongside other evidence in making decisions about possible changes to Green Belt boundaries. A boundary revision can take the form of an expansion or a contraction. However, equally a Green Belt Review may conclude that no changes are appropriate. The Green Belt Review and Sustainability Assessment provides the key findings and next steps through the objective appraisal of Green Belt parcels identified in the Green Belt Review and subsequent work by Surrey Heath Borough Council on their evidence base.

2.4.10 Four of the five Green Belt purposes were considered as part of the methodology for the Green Belt Review. For consistency, this approach was maintained for this part of the assessment. As such, each sub-area was assessed against NPPF Purposes 1-4.

2.4.11 The Site at land east of Snows Ride, Windlesham is identified as within Parcel SR9. Refer to **Figure 4**. Parcel SR9 includes two properties to the south of the Site off Windlesham Court, these are not within the proposed Site boundary. The assessment for Parcel SR9 states the following for each Purpose:

2.4.12 Purpose 1:- The parcel is not adjacent or close to any defined large, built-up areas and does not provide a zone of constraint to the sprawl of such an area.

2.4.13 Purpose 2:- Land forms part of the moderate gap between Snows Ride and Sunningdale, approximately 1.8km, and comprises woodland block and open fields as well as residential development and large scale commercial garden centers. There is potential for loss of openness within the settlement gap to increase the perception of the settlements merging.

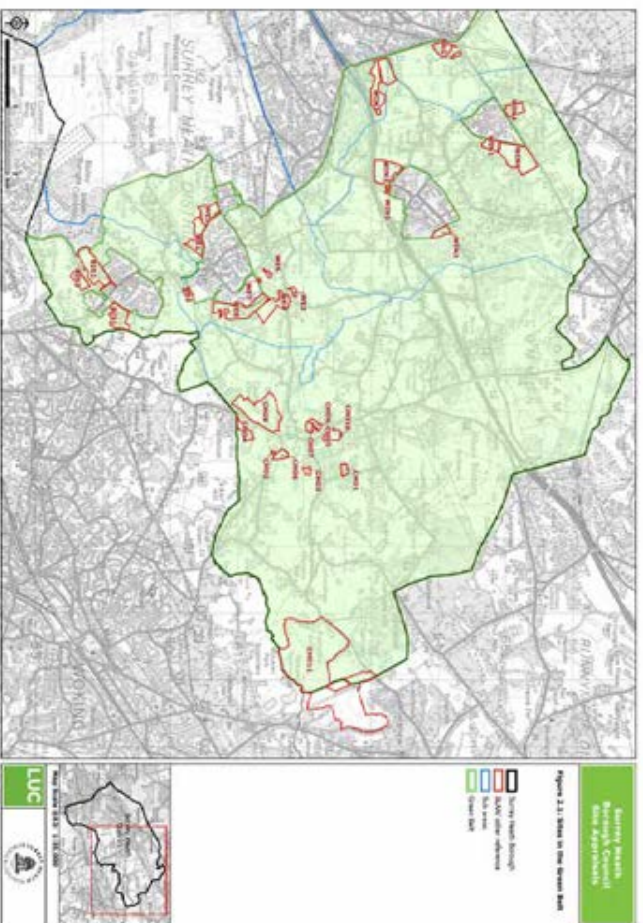


Figure 2: Surrey Heath Local Plan Site Appraisal, Green Belt Sites - London Road, Windlesham Site Ref: WIN6.

Not to Scale

Source: Surrey Heath Local Plan Site Appraisal, Green Belt Sites, March 2018

The parcel also forms a narrow gap between Windlesham and Snows Ride, however local topography, the wooded landscape and lack of connectivity between the settlements would mean that loss of openness would not significantly effect the perception of the settlement gap.

2.4.14 Purpose 3:- Land contains the characteristics of open countryside, principally comprising two large fields. The two residential properties in the southern portion of Parcel SR9 have a localised impact on the openness, however this does not undermine the overall performance of the parcel. The Council's Green Belt Review states that parcel SR9 performs moderately against purpose 3. The councils Green Belt Review clarifies 'The 2017 Study rated the parent parcel as performing moderately against Purpose 3. This was echoed within the 2018 Study, which assessed a SLAA site with boundaries almost identical to the current site (refer **Figure 2** and **para 2.4.2**). Notwithstanding this, the current study rates the parcel as functioning Strongly against Purpose 3. In respect of the 2017 Study, it is considered that the difference in rating is attributable to the differing characteristics between the parent parcel (which exhibited a somewhat settled character) and the largely open parcel currently under consideration. In respect of the 2018 Study, it is felt that the urbanising influence of surrounding development and the A30 is overstated, on balance.'

2.4.15 Purpose 4:- The parcel is not considered to form part of the setting, or contribute to the special character of any historic settlement.

2.4.16 The Green Belt Review found that parcel SR9 exhibits No function to Purposes 1 and 4 and a Strong contribution to Purpose 2 and 3. Parcel SR9 was not assessed against Purpose 5, however, the overall rating of parcel SR9 was assessed to be of High Function.

2.4.17 The findings of the Green Belt Review, concluded that **'Development within parcel SR9 would generally be well contained by the landscape and in most areas wooded areas would provide alternative Green Belt boundaries, although these are slightly less robust that the highways which currently define the Green Belt boundary in this location. The alternative boundary in this location may connect the settlement with the dispersed residential development present to the south east, which may lead the Green Belt boundary in this location to be perceived as diffuse. Release with adjacent parcels would not address or overcome this issue.'**

3. LANDSCAPE AND VISUAL BASELINE

3.1 Site Location and Context

3.1.1 The Site's boundaries and context are shown in **Figure 5**. The area (approximately 16ha) is geometric in shape and consists of two existing grass paddocks. The Site is almost entirely enclosed by well vegetated boundaries consisting of mature trees and hedgerows. There are a few gaps in the mature vegetation along western boundary to Snows Ride, allowing glimpses of the dwellings along the edge of Snows Ride. Along the western half of the Site there is a greater sense of connection to Snows Ride, particularly as the Site is utilised as horse paddocks, generally perceived as a settlement edge landuse, rather than arable field or open common land such as the nearby Chobham Common. Towards the eastern half of the Site, there is a much more rural wooded nature, even with glimpsed views of single dwelling set in woodland to the south east, it has a greater sense of separation and tranquility from the area of settlement at Snows Ride. The northern boundary of the Site is formed by London Road (A30), with the southern boundary contained by a strong belt of mature vegetation along Windlesham Court. This vegetation then extends onto the south eastern boundary at the rear of residential properties on Windlesham Court and Lavershot Lodge (private road). The principle features of the Site and surrounds are shown in **Figure 7: Site Photos**.

3.1.2 The surrounding context predominantly consists of small residential villages with some commercial development and large scale garden centers and nurseries to the north of the Site with the existing residential villages of Windlesham to the east and south of the Site. To the west and south there are a scattering of individual large detached dwellings set within large well vegetated grounds, giving the overall appearance of wooded sandy farmland. Access to green and open space is limited due to the distinct lack of Public Rights of Way (ProW) in the local area.

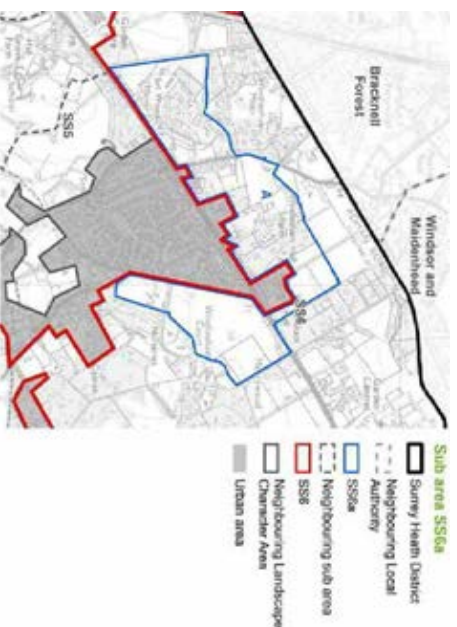


Figure 3: Landscape Sensitivity Assessment - Parcel SS6a. Not to Scale
Source: Surrey Heath Borough Council, Landscape Sensitivity Assessment, July 2021



Figure 4: Green Belt Review - Parcel SR9. Not to Scale
Source: Surrey Heath Borough Council, Green Belt Review, Annex 2, January 2022

3.1.3 The Site and surrounds, excluding areas of settlement such as Snows Ride, are covered by the London Area Surrey Heath Green Belt designation (refer to **Figure 2** adjacent). A full assessment of the Site's contribution to Green Belt Purposes is outlined in **Section 4**.

3.2 Published Character Assessments

3.2.1 The Site falls within the National Character Area 129 - Thames Basin Heaths, which follows the banks of the Thames as it extends from East London, through the activity of urban life and major residential areas. The Thames Basin Heaths National Character Area (NCA) stretches westwards from Weybridge in Surrey to the countryside around Newbury in Berkshire. Woodland accounts for a quarter of this NCA, reflecting the predominance of low-grade agricultural land. In this heavily wooded landscape, there are significant timber and biomass opportunities.

3.2.2 Common land is found across the NCA, with the largest commons found on raised plateaus of Tertiary sands and gravels. On these deposits, farming is largely limited to rough pasture and there are large estates. Non-agricultural land uses are widespread, and include large plantations and military bases.

3.2.3 The Surrey Landscape Character Assessment (April 2015) indicates that the Site is located within the London Area Green Belt of Surrey Heath and is within Landscape Character Type (LCT) SS: Settled and Wooded Sandy Farmland, further subdivided into Landscape Character Areas (LCAs), where the Site is situated in the Windlesham Settled and Wooded Sandy Farmland (SS6).

3.2.4 The Windlesham Settled and Wooded Sandy Farmland Character Area (SS6) surrounds the northern edge of Windlesham and extends to the north east of Bagshot. Residential development along Westwood Road connects the southern village of Windlesham to Sunningdale and divides the character area in two. The SS6 character area is defined by the significant extents of woodland.

3.2.5 The key characteristics of SS6 of relevance to the Site are described as:

- 'An undulating landscape....'
- Contains extensive areas of both broadleaved and coniferous woodland... The majority of the woodland elsewhere is fragmented by roads, settlement and golf course development.
- Set in between the woodland are pastoral fields, along with paddocks, nurseries and garden centers.
- Settlement consists of a relatively light scattering of farmsteads, small low density areas of dwellings and large houses enclosed by trees and evergreen shrubs... Settlement and surrounding Built Up Areas are mostly contained or screened by surround woodland and boundary vegetation.
- The A30 and two 'B' roads cross the character area, but elsewhere is limited to private drives and tracks.
- A few public rights of way cross through the character area, linking adjacent Built Up Areas to the wider countryside to the east, but central and western parts of the character area have limited public access.
- Windlesham and Sunningdale are linked by a ribbon of low density dwellings, but woodland between the two main areas of settlement prevents a sense of further urbanisation of the area between the two towns.
- Views are substantially limited by tree cover.
- The substantial areas of woodland within the character area result in a relatively secluded landscape, particularly within the dense woodland which has a sense of remoteness and tranquillity. Human influence is however obvious or detectable elsewhere, limiting the sense of remoteness overall.'

3.2.6 The Landscape Strategy recommendations for the SS6 LCA includes, encouraging sustainable and multi-purpose woodlands, promoting traditional woodland management techniques and the use of local species in new woodland areas or within hedgerows to be enhanced. The Landscape Strategy also recommends that built development is designed to

retain the pattern of villages and short rows of housing facing onto roads or commons to maintain the village setting. It also notes to ensure that new development is designed to retain tree cover and consider opportunities for new woodland planting to enhance existing and new development to integrate it into the local landscape.

3.2.7 The Site at Windlesham in effect lies within the Green Belt and within LCA SS6, being mostly contained by mature vegetation along each boundary and the wider woodland landscape, and is closely connected to the Snows Ride area of the village of Windlesham.

3.3 Historic and Cultural Issues

3.3.1 The name of Windlesham is thought to derive from the Windle Brook which runs to the south of the village settlements, south of the M3, and the common suffix 'tham' being the Old English word for 'homestead'.

3.3.2 Windlesham is a medieval village first recorded in 1178 and was once a remote farming settlement community built within Windsor Great Park. The community was so small that there is little mention of Windlesham, and surrounding villages, within the Domesday book. There have been some archaeological finds which can be dated back to the Bronze Age as well as some neolithic flints.

3.3.3 The village of Windlesham is a modern village with a few scattered remaining examples of late 18th century building work and road networks, however, these are very much intertwined with the modern cottages and villas. Many of the common fields that once existed in Windlesham were lost as part of the Enclosure Act of 1812.

3.3.4 There is a Grade II listed Milestone on the A30 / London Road, dating back to the mid 18th century, approximately 500m to the west of the Site. The milestone was carved by a local mason and marks 25 miles from Hyde Park Corner (Historic England List Entry Number: 1474953) and is part of a sequence of designated milestones along this stretch of the A30 / London Road.

3.3.5 Grade II listed Bagshot Park is also within 1.8km to the south west of the Site (Historic England List Entry Number: 1001381). Bagshot Park is a mid-Victorian garden and pleasure grounds in a parkland setting from the late 17th Century. Within Bagshot Park is Grade II Bagshot Park Mansion (Historic England List Entry Number: 1030005) a Tudor Gothic Style country house designed in 1877 by Benjamin Perry for the Duke of Comaught.

3.3.6 During the late 1960's and late 1980's three major housing developments were built off Snows Ride, Heath Park Drive and Windmill Field creating two distinct settlement areas to the Windlesham village.

3.4 Settlement

3.4.1 The Windlesham village is located in the north of the Surrey Heath Borough approximately 25 miles (40km) south west of central London, and 2.5 miles (4 km) north east of Camberley, and 3.3 miles (5.3km) to the south east of Bracknell. According to the 2011 census, Windlesham was recorded as having a population of 16,775.

3.4.2 The Site is located to the eastern edge of residential development off Snows Ride, a sustainable location with access to convenience stores, health facilities, public houses and restaurants all close by.

3.5 Site Character and Visual Amenity

3.5.1 The Site consists of two grass paddocks, one small square paddock in the east of the Site defined by existing shrub and tree vegetation, the remainder of the Site creates the second paddock. The Site is 16ha in size, the northern boundary of the Site is bounded by the London Road (A30) and is defined by a 17m deep strip of dense mature woodland. This dense woodland continues, for approximately 20m, along the western boundary of the Site, adjacent to Snows Ride. A strong

line of mature trees, with the occasional gap, forms the remaining western boundary. The physical southern boundary comprises a post and wire fence with a brick wall defining the boundary of the residential properties off Windlesham Court, with a large group of trees stretching along the length of the boundary, a small portion of this vegetation is evergreen. The eastern boundary of the Site is composed of a post and wire fence and well vegetated with mature trees and shrubs, just beyond this on the other side Lavershot Lodge Road is an area of dense woodland.

3.5.2 The Site lies at approximately 70m Above Ordnance Datum (AOD) and is located outside of the flood zone for the Virginia Water tributary (shown in **Appendix C**). The extensive woodland surrounding the existing settlement of Windlesham serves as a good level of screening to the Site from the south and south east as well as from the north and north west. The Site is not easily visible from external public footpaths and residential properties. The close relationship to settlement at Snows Ride is gleaned through the gaps in the vegetated boundary to the western edge of the Site, where glimpses of rooftops, brick wall to frontages and access drives can be seen, along with the Travis Perkins unit, which is well utilised and busy with delivery long bed trucks and lorries. This screen would be partial in winter and more complete in summer due to some of the deciduous vegetation not in full leaf in winter. This factor is important in assessing this Site, which is well contained.

3.5.3 The Site is currently accessed via a field gate off Snows Ride. There is a ditch along the smaller western boundary of the smaller field parcel. The vegetated boundaries contain trees of variable age class and contribute to the wooded nature and visual amenity of the locale. This is important in considering the possibility of development on the Site and the perceptions of the Green Belt and openness from Windlesham and Sunningdale.

3.6 Access

3.6.1 The local road network is connected by the A30 London Road that runs in parallel with the M3 located further to the south of Windlesham, and connects Egham in the north east to Basingstoke in the south west. The M3 and M25 transport network is also easily accessible from Snows Ride and Windlesham.

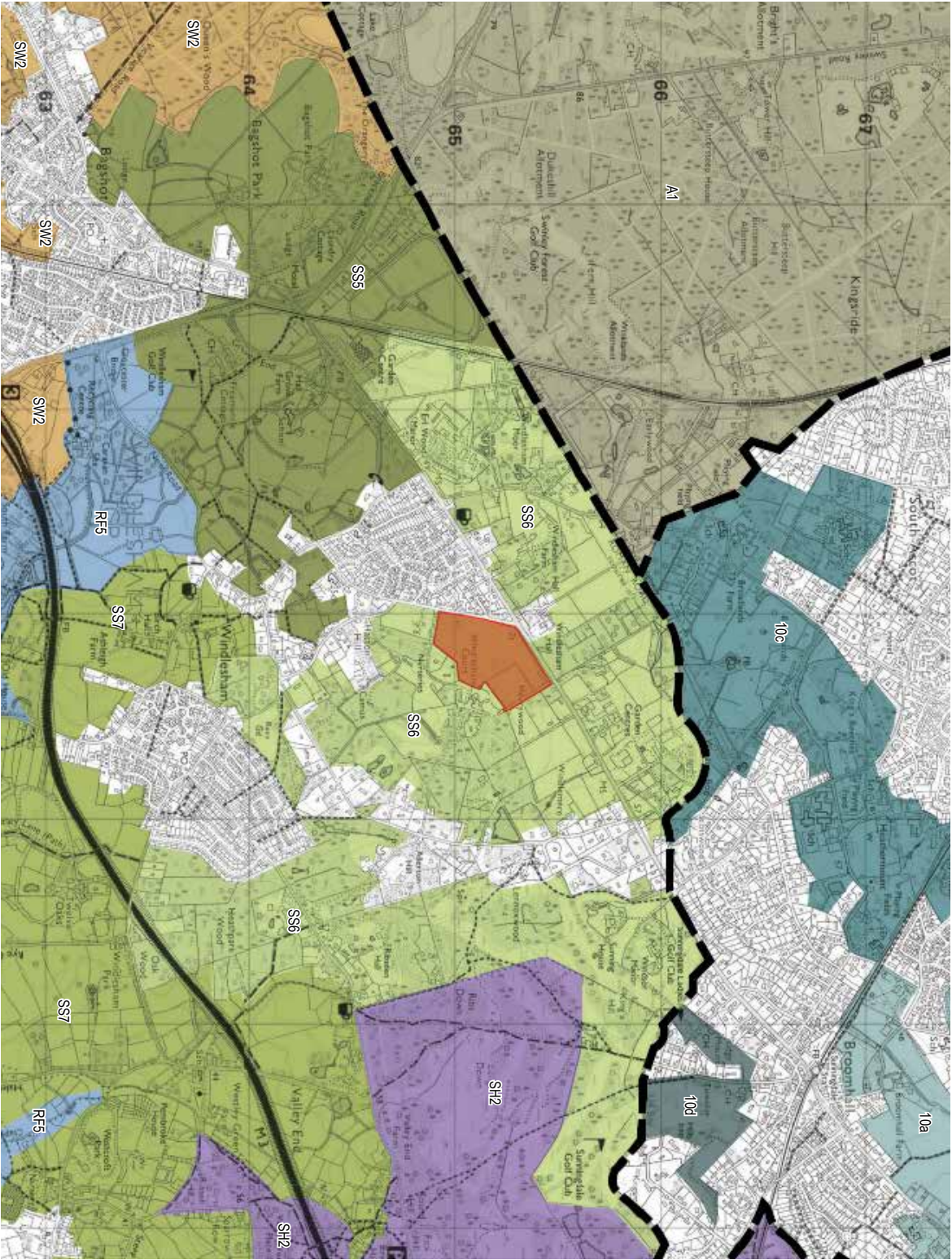
3.6.2 In the immediate vicinity there is a lack of Public Rights of Way, with PROWs located to the south around Windlesham, and further to the east across Chobham Common. The ancient Devils Highway Roman Road is also located to the north, although much of this has now disappeared in the landscape of today.

3.7 Designation

3.7.1 The Site is currently situated within Green Belt and is designated as London Area Green Belt, a Surrey Heath Borough Council (SHBC) policy which protects land from development. However, many local authorities with Green Belt land have had to consider releasing land from the Green Belt to meet development needs. Sites which are identified within the Surrey Heath SLAA need to be assessed in terms of their contribution to the purposes of the Green Belt, as well as in relation to their sustainability merits.

3.7.2 This Site is considered worthy of detailed examination, because if developed, it would not remove the existence of a green break between settlements and is unlikely to cause coalescence. The Site's boundaries are very well-defined and defensible.

3.7.3 The proposed development Site is designated as Green Belt, and is adjacent to Snows Ride and the settlement of Windlesham which is located outside of Green Belt land. The potential for compromising the Green Belt by development proposals is explored in **Section 4** - looking at the issue primarily in landscape and visual terms.



- KEY

Site Boundary

Borough Boundary
- Landscape Character

Surrey Heath Landscape Character Assessment

SS6 Windesham Settled and Wooded Sandy Farmland

SS7 Windesham and Knaphill Settled and Wooded Sandy Farmland

SS5 Bagshot to Windlesham Settled and Wooded Sandy Farmland

RF5 Windlebrook and Southern Bourne River Floodplain

SW2 Bagshot and Lightwater West Sandy Woodland

SH2 Chobham Sandy Heath and Common

Royal Borough of Windsor and Maidenhead Landscape Character Assessment

10a Sunningdale

10c South Ascot and South Sunningdale

10d Cobham Common

Bracknell Forest Landscape Character Assessment

A1 Bracknell Forest

Figure 5: Landscape Character Areas. 1:20,000 @ A3
Source: Surrey Landscape Character Assessment: (April 2015)

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3.8 Photographic Survey

- 3.8.1 A number of representative and illustrative views of the Site and surrounds have been selected to demonstrate the existing visual amenity, with viewpoint location chosen based on distance, the degree of visibility, the nature of the view and the anticipated number or type of potential receptors.
- 3.8.2 Photographs were taken in March 2022 and demonstrate a scenario when vegetation is not in full leaf. Visibility will be lessened in Summer when deciduous vegetation is in leaf. For each viewpoint the likely visual receptors are identified and the view is described. Refer to **Figure 6** and **Figure 7**.
- 3.8.3 View Descriptions
- 3.8.4 Viewpoint 1 - Windlesham Court. The tree lined lane provides a good level of screening to the Site, with occasional small gaps allowing filtered views through the vegetation. However, typically receptors on Windlesham Court would have their main focus on the direction of travel.
- 3.8.5 Viewpoint 2 - View to the south along Windlesham Court. The lane has mature vegetation with some gaps along the Site boundary, allowing for some filtered views into the Site. Strong woodland belt on the northern side of the lane, screens views from the east and south east.
- 3.8.6 Viewpoint 3 - View from Snows Ride at the junction with Snows Paddock, to the west of the Site. The view is directly facing the Site through the tree lined boundary. Whilst the existing vegetation does not screen views entirely, it would provide an element of softening to built form.
- 3.8.7 Viewpoint 4 - View looking north towards the Site from Snows Ride, near to the junction with Hawkes Leap. Snows Ride is generally very well vegetated with a mix of mature trees and low level vegetation. Trees are both deciduous and evergreen forming a substantial screen even during the winter months.
- 3.8.8 Viewpoint 5 - Looking north east towards the Site from PROW junction with footpath 26 and 27. The PROW crosses the golf course, however intervening vegetation scattered through out the golf course prevents any direct views of the Site. The Site and roof lines of residential properties in the settlement at Snows Ride, neither is the development Site.
- 3.8.9 Viewpoint 6 - View from Snows Ride towards the western corner of the Site, near the junction with Windlesham Court. The tree lined western boundary of the Site allows for some clear views between the tree trunks into the Site. Vegetation along the northern and eastern boundaries curtail views and contain the Site. A dwelling on Windlesham Court is visible through the trees.
- 3.8.10 Viewpoint 7 - View from Snows Ride next to the junction with London Road, looking eastwards towards the Site. The boundary is well vegetated with trees and a low level hedgerow screening the majority of the Site from view. Where the hedgerow is gappy, or there are gaps between the trees there are some glimpsed views into the Site.
- 3.8.11 Viewpoint 8 - Looking south east towards the Site from London Road (A30) near the junction with Snows Ride. The boundary of the Site along London Road is well vegetated with a thick band of woodland. Vegetation along Snows Ride is slightly more gappy which allows for a few glimpsed views to the Site between trees.
- 3.8.12 Viewpoint 9 - View south from Snows Ride. Mature trees and hedgerow vegetation screen the majority of views to the Site. Some views are afforded above the hedgerow and between gaps in the trees.
- 3.8.13 Viewpoint 10 & 11 - Views from London Road, east (10) and west (11). Vegetation along both sides of London Road is strong and screens views towards the Site. There are a few dwellings and commercial enterprises along here, just discernible through the mature vegetation, which gives rise to a perception of a wooded landscape.
- 3.8.14 Viewpoint 12- Views from London Road. Vegetation along both sides of London Road is strong along with the existing residential development it screens any views of the Site. Again the perception is of a wooded landscape with pockets of settlement.

3.9 Site Infrastructure and Social Capital

- 3.9.1 Approximately 2km to the south of the Site lies the M3 Motorway, linking Windlesham to the wider road network. To the east of the Site is Bagshot train station, which is on the South Western Railway Line, providing access to London Waterloo to the east, and Portsmouth, Bournemouth and Weymouth to the south. Approximately 2.5km to the north east of the Site is Sunningdale Railway Station, providing access to Reading and into London.
- 3.9.2 To the east of the Site is Windlesham Golf Club, providing an area of recreation. The Field Of Remembrance lies to the south of the Site, where the local communities use the field for community events.
- 3.9.3 There are garden centers to the north of the Site off London Road, which also include cafe and restaurants within walking distance of the Site. There is a bus stop on London Road, just to the north of the Site which provides good connections to the southern development in Windlesham, Light Water and Bagshot.
- 3.9.4 The two nearest schools are Windlesham Village Infant School and Woodcote House School both of which are a 10 minute walk away through the village.
- 3.10 Landscape Baseline Summary
- 3.10.1 The Site is almost entirely enclosed by well vegetated mature trees and hedgerows along all boundaries, there are a few gaps in the mature vegetation along western boundary adjacent to Snows Ride. The Surrey Landscape Character Assessment (April 2015) indicates that the Site is located within the Windlesham Settled and Wooded Sandy Farmland (SS6). A key characteristic of relevance is
‘Settlement and surrounding Built Up Areas are mostly contained or screened by surrounding woodland and boundary vegetation, with the character area having limited public access. Views are substantially limited by tree cover’.
- 3.10.2 The extensive woodland surrounding the existing settlement of Windlesham serves as a good level of screening to the Site from the south and south east as well as from the north and north west and therefore is not easily visible from external public footpaths and residential properties, especially in summer, when the vegetation is in full leaf and screen a number of the views into the Site. This factor is important in assessing this Site, which is well contained, considering the possibility of development on the Site and the perceptions of the Green Belt and openness from Windlesham and Sunningdale.
- 3.10.3 The Site is currently situated within the Green Belt and is designated as London Area Green Belt, a Surrey Heath Borough council (SHDC) policy which protects land from development. Other than the Green Belt the Site is not within nor abutting any other designation areas.
- 3.10.4 This baseline assessment of visual amenity clearly indicates that the Site has no visual connection between Snows Ride and Sunningdale. Development of the Site as proposed, would be set back from London Road with the built form located towards the western side of the Site, adjacent to Snows Ride area of settlement and thus retaining a substantial area of green open space to the east. This has good potential for the creation of a strong defensible Green Belt boundary, whilst ensuring there is no perception of coalescence between Sunningdale and Windlesham (Snows Ride).



Figure 6: Photographic Survey - Viewpoint Locations. Not to Scale

Source: Ordnance Survey Crown Copyright 2022. All rights reserved. License Number 100022432



Viewpoint 1

Site
Windlesham Court



Viewpoint 2



Viewpoint 3

Figure 7: Site & Surrounds Views.
Source: JBA, March 2022



Viewpoint 4

Snows Ride



Viewpoint 5

PRow 27



Viewpoint 6

Figure 7: Site & Surrounds Views.
Source: JBA, March 2022

Site



Viewpoint 7

Site



Viewpoint 8

London Road

Snows Ride

Site



Viewpoint 9

Snows Ride

Figure 7: Site & Surrounds Views.
Source: JBA, March 2022



Figure 7 : Site & Surrounds Views.
Source: JBA, March 2022

4. GREEN BELT ASSESSMENT

4.1 Current Effect of Site on Green Belt

4.1.1 The Site consists of two grass fields utilised in the main as horse paddocks. As far as the grade of agricultural land is concerned, this land is classified as being Grade 4, as identified on the Provisional Agricultural Land Classification mapping by Natural England.

4.1.2 The Site is adjacent to existing residential dwellings and is currently accessed off Snows Ride, with well-vegetated mature trees and hedgerow boundaries. The proposed development is contained by the existing settlement and the extensive woodland surrounding Windlesham.

4.1.3 The Site, possesses a limited visual envelope. Views are restricted to the residences of Snows Ride adjacent, and glimpses from the hedgerow gaps along the adjacent roads.

4.1.4 The existing settlement edge to the western boundary of the Site, comprises a combination of residential houses, with garden boundaries fronting Snows Ride and tree with hedgerow vegetation along the boundaries. This has a localised impact on the openness of the Green Belt in this location. The Site comprises grass paddocks and contains a single built structure, of equine use, these are typical sub urban landscape components. The influence of the strong existing boundary vegetation provides the application Site with strong levels of physical and visual containment.

4.1.5 An assessment of the land as it exists currently, against the purposes of Green Belt set out within the NPPF is set out below (refer to **Appendix E**):

• **Restrict sprawl of large built up areas:** At present, the proposed Site located within the Green Belt has strong, well vegetated boundary edges. The Site does not physically or visually contribute to any urban sprawl.

• **To prevent neighbouring towns merging into one another:** The nearest settlement, Sunningdale, is located to north east and would not bring about any of coalescence. Whilst the Site does provide an open green paddock on an aerial map, in reality the perception of the settlement gap is created by the lack of visibility of built form, and the wooded verdant and green nature of the route along London Road. Currently there is no intervisibility between the areas of settlement between Snows Ride and Sunningdale, and the well vegetated Site boundaries, along London Road serve to separate the areas of settlement with green wooded verges, matching that of the woodland edge opposite to the northern edge of London Road.

• **To assist in safeguarding the countryside from encroachment:** Whilst the Site does provide an open green paddock on an aerial map in reality much of the internal green area is screened from view. However, the section along Snows Ride is thinner with more gaps, visually and physically providing a greater and closer connection to the area of settlement at Snows Ride. This section of green belt boundary, therefore, is not considered as strong and permanent as the boundary to London Road. The encroachment of settlement has already permeated the existing green belt boundary along Snows Ride. The strength of the existing Site boundaries would ensure that the proposals would not contribute to encroachment into the countryside.

• **To preserve the setting and special character of historic towns:** The Site is self-contained and is not within or adjacent to any Conservation Areas.

• **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land:** The Site is considered as being greenfield land.

4.2 Sensitivity of the Site

4.2.1 The Site is self-contained and has strong, defensible external boundaries, in particular the dense and mature trees and hedgerow boundaries around the Site, creating layers of vegetation, which mostly entirely screen and prevent views in the majority, and will provide a higher level of filtered/screened views through summer months. Therefore no apparent incursion into green belt would occur, and there would not be any ill-defined boundary left after development.

4.2.2 Following development and implementation of the green infrastructure framework as proposed, the Site boundaries would be considered strong, robust and defensible, with the mature vegetation along them, and the existing settlement edge providing absolute constraints to development. The Site's fairly regular shape is closely related to the existing settlement edge and is not a finger of 'sprawl' extending out into the countryside.

4.2.3 The Site is strongly related to the existing settlement edge of Snows Ride with views towards existing properties along Snows Ride and Windlesham Court from within the Site. There is a no intervisibility between the Site and the wider settlements due to existing mature boundary vegetation and extensive wooded landscape surrounding the Site.

4.2.4 The methodology used for assessing landscape sensitivity as part of a Landscape and Visual Impact Assessment, (as described in the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment 3rd Edition) involves assessing the landscape value and susceptibility for a number of relevant elements and factors on a scale of the importance of the effect (refer to **Appendix E**). A matrix is then used to convert these two ratings into a single rating for landscape sensitivity. This methodology was adopted for this Green Belt Study.

4.2.5 The initial stage was to assess the Site's landscape value against a set of criteria based on the characteristics that contribute to open countryside character: the degree of naturalness or urban-ness of the land cover, the degree to which land use is typical of countryside or urban areas and the degree of tranquillity. The Site was rated as one of five possible categories for landscape value in relation to open countryside character: very high, high, moderate, low or zero.

4.2.6 The landscape value of the Site was found to be 'Medium', with landscape elements which make a contribution to defining landscape character of average condition. The Site is so well contained by vegetation and the existing settlement of Windlesham that the proposed development on the Site would have a negligible contribution to encroachment on the countryside.

4.2.7 Whilst the Site is representative of the Windlesham Settled and Wooded Sandy Farmland, being a grass paddock enclosed by woodland, the Site is so well contained physically and visually that development would have very little impact on the overall landscape character of the area.

4.2.8 **Table 1** shows the results of the assessment of the three criteria used to assess the impact that the development of the Site would have on the safeguarding of the countryside from encroachment (Green Belt Purpose 3).

4.2.9 The next stage in the assessment is to consider the landscape susceptibility of the Site. This is the degree of vulnerability to change of the landscape. Following the methodology of the Guidelines for Landscape and Visual Impact Assessment 3rd Edition, the following three criteria were assessed:

• Capacity for accommodating development without affecting the baseline (e.g. will there be a visual effect on key receptors?)

• The potential for mitigation (e.g. screen planting)

• The potential for the substitution, replacement or re-creation of features (e.g. the replanting of a lost hedge)

4.2.10 These were assessed according to whether the level of opportunity offered by the Site was very good, good, some opportunities, low or very low.

4.2.11 As with the assessment of a single rating for landscape value, the average ratings for the three categories assessed for landscape susceptibility was used as the level for this category. The overall susceptibility level of the Site was considered

to be Low, due to its existing containment, very good potential for mitigation, very good potential for restoration of features and capacity for accommodating development without affecting the baseline.

4.2.12 The third and final step for assessing landscape sensitivity involves the use of a matrix to convert the ratings for landscape value and susceptibility (assessed on the five-point scale) into a single rating for sensitivity using same the five-point scale as has been used in the assessment of the other Purposes (see Appendix A). A Medium landscape value and a Low landscape susceptibility combine to give a Low - Medium landscape sensitivity, to the type of residential development as proposed.

4.2.13 The Site, at 16ha, constitutes paddocks, bordered on all sides by mature vegetation, although this is gappy along Snows Ride allowing a closer connection to this area of settlement, and is considered to have a low sensitivity to this type of development.

4.3 Potential Effect of Development of the Site on Green Belt

4.3.1 Following initial landscape and visual assessment of the site, the emerging proposals allow for circa 5.5ha of care village and 10ha of SANG. The creation of a new defensible Green Belt boundary, has considered references to historic mapping and lines of historic hedgerows and trees, as well as responding to the existing landscape components visible in today's landscape through the use of aerial mapping, such as the large blocks of woodland to the south and Site survey. This has further developed by taking that line through to the north east to join with the historic hedgerow in the north east of the Site. The historic hedgerows have also formed the robust new Green Belt boundary where they are proposed to be restored, and also retain large areas of open green space, retaining and supporting the visual separation of settlement at Snows Ride and Sunningdale.

4.3.2 Through careful landscape planning and assessment based zoning, the overall significance of effects in landscape and Green Belt terms will be minor. Furthermore, the proposal would not compromise the aspirations of the Borough's Green Belt Policy, because the proposals provide ample land and opportunities to create tree planting and habitat creation as part of the SANG. The proposals allow for the provision of new woodland and habitat planting contribute to augmenting the existing wider woodland character to the east and south. Therefore, is unaffected by the proposals, which are contained within a strong curtain of vegetation. To help to ensure high quality design the integration of existing green infrastructure within the development would fulfil design aspirations of the Local Plan and the NPPF.

4.3.3 The proposal provides the opportunity to create comprehensive development of the circa 5.5ha of the Site due to be developed as a care village and the other 10ha as SANG and recreation provision. The proposals fulfil many of the policy criteria for new development, in terms of inter alia:

- Retaining key existing green infrastructure elements,
- The wildlife mitigation,
- Replanting measures, and restoration of historic hedgerow boundaries
- Responsive urban design, that acknowledges scale and character of the current building lines and heights.
- Creation of meaningful green infrastructure with provision for SANG.
- Fulfills sustainable and appropriate house and layout design and referencing, in accordance with the Local Plan.
- Meeting sustainability requirements and the benefits of healthy ecological systems.
- The opportunity of setting in place a new sustainable model for landscape adoption and management.

4.3.4 It is considered that the development proposals can be suitably mitigated through a coordinated design approach, such that any impact in landscape and visual terms is likely to be low. Following a multidisciplinary approach incorporating arboricultural and ecological assessments and recommendations, in support of the mitigation strategy, has the potential to create a more attractive and biodiverse green infrastructure.

4.4 Assessment of Site against Green Belt Purposes

4.4.1 An independent assessment has been carried out in order to assess the contribution that the Site makes to the five purposes of Green Belt as defined in the NPPF. The results of the foregoing assessment of the landscape character and sensitivity of the Site and its setting and the visual connections between the Site and receptors in the open countryside

and the margins of settlements in the study area can be used to assess the contribution made by the Site to Green Belt Purposes.

4.4.2 The results of the foregoing assessment of the landscape character and sensitivity of the Site are summarised in **Table 1**. Consideration of the impact of the proposed development on Green Belt Purposes is analysed below and expressed in **Table 2**.

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

4.4.3 The Site comprises open greenfield land, as identified in the Council's Local Plan Site Appraisal (2018) and Landscape Sensitivity Assessment (2021), as part of the Evidence Base for the new Local Plan. The Site abuts the built-up area of Windlesham to the east, and adjoins a large woodland to the further east and south east. This is acknowledged in the Site Appraisal document which states that a significant number of homes could be accommodated on the Site as there are no physical constraints.

4.4.4 The Site is influenced by its relationship with the built up area of Windlesham to the west, and there are views towards the rooftops of existing residential properties along Snows Ride to the east from within the Site. Looking south from within the Site four of the six residential properties along Windlesham Court are visible between through boundary vegetation. There is no visual connection between the Site and development along London Road. The Site would therefore be perceived as an suburban extension to Snows Ride Windlesham, rather than infill development or ribbon development along London Road.

4.4.5 It is considered that the Site has strong boundaries which will be further enhanced by new vegetation as part of the proposed development. The well contained nature of the Site, along with new woodland planting creating a new defensible Green Belt boundary ensures that development of the Site will not contribute to the perception of the sprawl of Windlesham.

Purpose 2: to prevent neighbouring towns from merging into each other

4.4.6 For the purposes of this assessment 'neighbouring towns' are taken to include important settled areas, including villages such as Sunningdale, Bagshot, Lightwater and settlement in the south of Windlesham.

4.4.7 The issue of closing the gap between Windlesham and Sunningdale potentially resulting in coalescence is a non-issue. There are no national or local guidelines that stipulate how large or how small such a strategic gap should be. The Site is not visible from Westwood Road. The proposed development will have no visual impact on the perception of a gap between Sunningdale and the Snows Ride settlement area of Windlesham, as it is so well contained within its boundaries, which at this point along London Road are approximately 17m deep. Additionally the Site would not contribute to linear development along London Road due to the strong vegetation along this northern boundary and considered design approach of the Site including set back of built form and the retention of the eastern most parcel of land and an area of accessible open green space. The Site is a logical extension to the settlement and existing boundaries and responding to historic hedgerow lines within the development will provide a clear boundary.

4.4.8 The contribution to Purpose 2 of the Site in relation to the criterion was judged to be of 'zero importance'.

Purpose 3: to assist in the safeguarding of the countryside from encroachment

4.4.9 The assessment of the contribution of a Site in safeguarding the countryside from encroachment involves the consideration of the nature of the setting of the Site and the sensitivity of the Site to landscape change. A third factor also needs to be considered – the strength and permanence of the Green Belt boundary that would be created if development were to take place. A strong and defensible boundary is more likely to succeed in safeguarding against further encroachment into the Green Belt during the duration of the Local Plan and beyond.

4.4.10 Three criteria were considered in order to assess the overall contribution of the Site to Green Belt Purpose 3:

- The permanence of the Green Belt boundary that would result following development of the Site. This considers the degree to which the boundary that would be created would be 'defensible' against pressures for further development. Physical features would form the strongest, most defensible new boundaries. The least defensible would be potentially

ephemeral features such as hedges, fences and land ownership boundaries. Preventing development on a Site without a defensible boundary would have a high importance in assessing against Purpose 3, while one with a boundary that would make further encroachment difficult, such as a railway line or large river, would have a low or zero importance.

- The open countryside character of the setting of the Site and its degree of representativeness of countryside character

The assessment of this criteria involves a consideration of the landscape context of the Site. Does it show the characteristics of open countryside? A Site where the landscape context had all the elements of open countryside would be categorised as 'unspoilt open rural character' and be rated as having 'High importance in contributing towards this Green Belt purpose'. If the Site had urban elements it would be rated as having 'less importance in terms of safeguarding the countryside from encroachment'.

- The sensitivity of the Site to accommodate development without a major adverse effect on the countryside character of the landscape. This is assessed by considering the key relevant landscape receptors that relate to the Site itself (i.e. its countryside character, the 'naturalness' of its land cover and its tranquility) and assessing them in terms of their value. A matrix is used to convert these assessments for value and susceptibility (ranging from 'major' to 'negligible') into a single rating for landscape sensitivity. A Site with a low landscape sensitivity could be developed with less adverse visual impact on the open countryside than one with a higher sensitivity. A high sensitivity Site would therefore have a high importance in contributing to the safeguarding of the countryside from encroachment as to develop it would have a major impact on the open character of the countryside.

4.4.11 In terms of views into the Site of open countryside, from London Road, and the perception of the Green Belt's openness from the settlement, the dense woodland boundary here, serves to substantially screen the Site in winter and the screening would be even denser in summer. In terms of views from Snows Ride, there is already a closer connection to existing settlement here through the gaps in the vegetated boundary, however in summer, much of this would be screened from all but the first floor rooms of immediately adjacent residences. As this existing Green Belt boundary to Snows Ride is permeated by existing areas of settlement it presents an opportunity to establish a strong new Green Belt boundary slightly further to the east, following the strong lines of existing components within the landscape and including restoration of historic hedgerow boundaries. Additional planting to the edge of the developed area and within the SANG will create further vegetation layering and strengthen the amount of screening already afforded from the boundary vegetation.

4.4.12 What might be visible above mature trees boundaries would depend upon the elevation of the development. Initial studies would indicate that buildings of 8 metres in height would not be visible from the north, south, east or west and the Site could be developed with negligible impact visually - and little damage to the perception of openness and the Green Belt.

4.4.13 When considering longer distance views and perceptions from walkers along public footpaths to the west of the settlement at Snows Ride from the Windlesham Golf Club, layered tree and woodland vegetation along with existing areas of settlement screen all views to the east and the Site.

4.4.14 If the development followed basic recommendations set out from the initial landscape assessment – inter alia – retaining the mature vegetation boundaries; generally restricting development to 2 storey height; and establishing a new strong woodland Green Belt boundary it would ensure little to no impact beyond the Site's well contained boundaries.

4.4.15 Overall the Site is considered to make a low contribution to this purpose.

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

4.4.16 The Site is not considered to form part of the landscape setting of a historic urban area. There is no inter visibility between the Site and the Conservation Area / listed buildings. Development of the Site would therefore have no effect on the settings of the Conservation Areas and does not contribute to preserving the setting and special character of a historic town.

Purpose 5: to assist in urban regeneration

4.4.17 The application Site is located in the Green Belt and it is identified as greenfield land. It is situated at the boundary of the Green Belt. The Local Plan pro actively looks to identify and make the most efficient use of sustainable fields in the Green

Belt, with realistic options acknowledged whereby greenfield land within the Green Belt will be considered after all other options. The contribution a Site makes to the 5 purposes of Green Belt will be reviewed to aid this process.

4.4.18 The countryside comprises an important economic, social and environmental asset, which it is important to sustain. As the Borough population grows, pressures will be increasingly placed upon the countryside in order that economic growth can occur. Green Belt will become increasingly under pressure, but should only be released to development, where it affords the opportunity to create a network of connected green open spaces providing access to natural green space, enhancing biodiversity and helping to mitigate the impact of development. The Site does afford such an opportunity, connecting the extensive woodland to the east and south east of the Site, and by providing a substantial area of SANG.

Summary

4.4.19 The proposed development of the Site would not result in sprawl or any greater perception of coalescence of settlements. Overall the proposal provides the opportunity to offer comprehensive development of the whole Site with little to no impact on the openness of the Green Belt. The key considerations in this respect are:

- The greenfield nature of part of the Site;
- Existing settlement along Snows Ride and
- The visually contained nature of the Site resulting from the existing mature vegetation boundaries.

4.4.20 It is acknowledged that the increased level of built form at the Site will alter the level of openness of the Site in certain areas, but will also give rise to improvements in public access. The creation of the SANG will improve recreational use of the area by the local community. New planting and clearly defined SANG typologies will ensure the new Green Belt boundary will be robust and defensible.

4.4.21 In terms of harm to the Green Belt, it is demonstrated above that the proposed redevelopment of this Site will not conflict with the purposes of Green Belt designation, furthermore, it presents the opportunity to strengthen the Green Belt boundary to areas of settlement, new and existing at Snows Ride. It is this level of harm that needs to be weighed in the balance when judging the appropriateness of this development in the Green Belt.

4.5 Variations in Green Belt Assessment and creation of New Defensible Boundary

4.5.1 Overall, the LPAs appraisal of the Site (Ref: SR9) within their Green Belt Review (2022) broadly aligns with the findings of this assessment. Refer to the summary Tables on page 17 of this report.

4.5.2 However, the finer grain detail provided by this assessment has identified that contributions this Site makes to Purpose 2, (preventing the merging or coalescence of neighbouring settlements), following development as proposed, confirms that the Site would not contribute to the encroachment into the visual green gap, nor would it result in areas of settlement being visible from one another. There is currently no intervisibility between settlement at Snows Ride and Sunningdale, which is acknowledged within the Green Belt Review, and this will not change following development as proposed. Therefore, there is no physical nor visual coalescence or merging and therefore does not contribute to Purpose 2.

4.5.3 In terms of Purpose 3, the Green Belt Review of the Site would not have had the benefit of the landscape led proposed masterplan which provides for the creation of a substantial SANG, and as such a new strong and robust defensible Green Belt boundary. The Site is well contained by strong existing dense and mature green infrastructure around the Site with the exception of the boundary to Snows Ride where there is a visual permeation of existing settlement. The proposed strategic green infrastructure provides further containment and a new defensible boundary to the Green Belt, following the strong lines of existing components within the landscape and restoration of some historic hedgerow boundaries. Therefore following development the relative contributions to Purpose 3 are confirmed as being Low.

Table 1: Assessment of Sensitivity

Value	Susceptibility	Sensitivity	Description
Medium	Low	Low - Medium	The Site's landscape value in relation to open countryside characteristics is Medium while its susceptibility (vulnerability to change) of the particular type of residential development, is Low giving an overall sensitivity of Low-Medium.

Table 2: Assessment of Green Belt Purposes

Purpose 1: to check the unrestricted sprawl of large built up areas					
Relative contribution to Green Belt purposes					
	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Comments	Whilst the Site is located in close proximity to the settlement area off Snows Ride, the Site consists greenfield land and development of the Site would not result in unrestricted sprawl. The Site is well contained by strong physical features including the mature tree and hedgerow boundaries, dense in places, and built-up area off Snows Ride to the west.				

Purpose 2: to prevent neighbouring towns merging into one another					
Criteria	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Effect on the visual 'green gap'	No encroachment	Some/little encroachment	Moderate encroachment	Large-scale encroachment	Significant encroachment
Views between settlements	Neighbouring settlements not visible	Glimpsed views from neighbouring settlements	Views from neighbouring settlements partly obscured	Fairly clear views from neighbouring settlements	Clear views from neighbouring settlements
Relative contribution to Green Belt purposes					
	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Comments	The Site is physically and visually separated from both Windlesham to the south and Sunningdale to the east, and as such would not result in any physical or visual coalescence or merging.				

Purpose 3: to assist in safeguarding the countryside from encroachment					
Criteria	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Permanence of Green Belt boundaries following development	Definitive	Strongly defensible	Moderately defensible	Weakly defensible	No defensible boundary
Character	Significant built form within and/or around the site	Strong urban character, not perceived as open countryside	Notable urban context,	Strongly/largely rural character	Unspoilt open, rural character
Sensitivity	Low	Low to Medium	Medium	Medium to High	High
Relative contribution to Green Belt purposes					
	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Comments	The Site is well contained by strong existing dense and mature green infrastructure around the Site, all to be retained. The proposed strategic green infrastructure provides further containment and a new defensible boundary to the Green Belt, following the strong lines of existing components within the landscape and restoration of some historic hedgerow boundaries.				

Purpose 4: to preserve the setting and special character of historic towns					
Relative contribution to Green Belt purposes					
	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Comments	The Site is not considered to form part of the landscape setting of a historic town, nor does it impact on any Conservation Areas or Listed Parks and Gardens.				

5. RECOMMENDATIONS

5.1 Key Issues

5.1.1 There is a need to demonstrate the potential of the Site and assess any preliminary impacts from development on this Site through a more thorough landscape appraisal and outline development impact assessment.

5.1.2 The visually contained nature of the Site, its current land usage, relief, adjacent land usage, and potential for forming a new strong defensible green boundary, it is more than reasonable to suggest that this Site is entirely suitable to help accommodate housing need, which is supported by the Surrey Heath Local Plan Appraisal of Sites, 2018.

5.1.3 An LVA should be produced following exploration of a development layout and this document should give solid recommendations which were taken into consideration to materially inform any proposals. These might well include inter alia:

- Retaining and enhancing the existing vegetated boundary around the development, incorporating the new pedestrian and cycle routes;
- Retaining existing mature trees to all boundaries;
- Enhancing boundary vegetation along the south, west and north sides of the Site providing a green infrastructure and biodiversity benefit;
- Planting new trees in key locations and creating meadow habitats, contributing to the provision of new SANG.
- Well-sited buildings and spaces of appropriate form and massing:
 - i) Inter alia – to set the built development back from the existing dwellings - by locating a new pedestrian / cycle path to create an attractive frontage to houses facing existing properties along Snows Ride, ensuring natural surveillance.
 - ii) Create space within the development for new tree planting, including street trees and trees within the new open space for future skyline impact and screening.
 - iii) Plots shall face the new open spaces for security/surveillance.
 - iv) Prevent visual impact from fences and rear gardens by ensuring the layout faces outwards onto green spaces; and rear gardens are internal and hidden behind houses wherever possible to ensure active frontages.
 - v) The layout should use a variety of local building forms, reflecting the surrounding vernacular and keeping ridge lines within the tree canopy heights where possible.

5.1.4 The following recommendations require further consideration during the detailed design phase of the development and could be the subject of planning conditions. Those of particular value are given for reference.

- Ensure completion of long-term (min. 10 year) combined landscape / arboricultural / ecological management plan to ensure appropriate management, enhancement and sustainable retention of strategically important existing and new trees new boundary hedgerows/ tree planting;
- No dig solutions must be used where specified on arboricultural plans;
- Preparation of an integral hard and soft landscape scheme for the development and open space. Sometimes the split between hard and soft landscape proposals can lead to the lack of consistency in the approach to the design and therefore this should be conducted together;
- A lighting scheme coordinated with tree planting is particularly important in order to ensure there is no collision between lighting columns and tree positions and threats to bats. The basic principles of the design have been agreed and are

shown on the landscape strategy plan. The location of new trees has been chosen carefully away from the key through vista.

- Detailed ecological surveys to best mitigate ecological protected species and ensure a net biodiversity gain within the Site.

5.1.5 The following recommendations that might be given within a fuller LVA, require further consideration during the construction of the development and could be the subject of planning conditions. These are summarised below.

- Progression of development landscape-led development layout, to allow for co-ordinated approach between a multidisciplinary design team, including engineers, lighting scheme and drainage design to ensure protect vegetation and landform.
- The protection of Site features of landscape, ecological and amenity value:
 - i) No construction of buildings, hard surfaces or services within root protection areas (RPA) of retained vegetation without a suitable Arboricultural Method Statement, Tree Protection Plan and Schedule of Tree Works, prepared to ensure the retention of important existing vegetation. The root protection areas should be protected throughout the course of the development.
 - ii) Site supervision by a qualified arboriculturist and ecologist during the construction phase will ensure that protective measures to retained vegetation/ species respectively are carried out.
- Parameters of detailed landscape proposals to include, correct local landscape character species, consideration of distances from foundations and utilities to ensure longevity of the tree planting and reduce further resident pressure on the tree removal. Exploration of options to ensure protection of new tree planting to maintain tree cover in perpetuity.

5.1.6 The benefit of a landscape and green infrastructure led scheme, can be seen on the strategy plan, shown in **Appendix D**, affording the provision of a new strong and defensible green infrastructure boundary from the edge of the proposed developed area across the remainder of the Site, linking to existing vegetation along London Road, Lavershot Lane and to the extensive woodland to the east and south east of the Site. Creating new pedestrian and cycle routes around the development Site would contribute to NPPF Section 8: Promoting Healthy & Safe Communities, states that planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users.

5.1.7 The proposals offer the opportunity and benefit of enabling a landscape and ecological management plan to improve the biodiversity of the landscape between the developable areas and the existing wildlife and ensuring the ecology services which might include the healthy community benefits of green infrastructure, green ecological connectivity corridors, shade pool provision, habitat creation, biodiversity enhancement programmes - through ecological management regimes.

5.1.8 There is an opportunity for a green infrastructure legacy through sustainable land adoption approaches – such as those emerging from new companies like OASIS Land Asset Management Ltd, which utilises sustainable funding strategies, to ensure high standards of landscape and ecological maintenance and management in perpetuity. An organisation that promotes community involvement and engagement to encourage active participation in management, management plan reviews and community-centric land uses. The NPPF Section 8: Promoting Healthy & Safe Communities. The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.

6. CONCLUSIONS

6.1 Green Belt Policy and Coalescence

6.1.1 The proposals for development of the Site to the east of Snows Ride, Windlesham upholds the intention and purpose of national and local planning policies and does not contravene such policy in a harmful way that might serve to undermine that policy's future robustness. The aims and objectives of such policy, prevent loss of character, erosion of valuable countryside, denudation of protected Green Belt countryside and ensure the integrity of the strategic green gaps between settlements.

6.1.2 It is considered that the Site can be developed with minimal adverse impact upon the landscape, the townscape and most receptors, although it is recognised that this would need further proving through a more detailed LVA and LVA processes, conducted in accordance with the Guidelines of Visual Landscape Assessment by the Landscape Institute and Institute of Environmental Managers (GLVIA3).

6.1.3 As no one purpose of the Green Belt has priority over another, the overall assessment level should be the first consideration when assessing which sites are suitable for release from Green Belt. The individual ranking and assessment against each purpose should then be considered.

6.1.4 This report provides a finer grain assessment than that set out in the Surrey Heath Borough Council Green Belt Review, in order to determine harm at a much more local level. The results of this assessment indicate that the Site can be developed as proposed with minimal harm to the purposes of Green Belt.

6.2 Summary

6.2.1 Overall, the Site is a highly suitable and will have positive benefits, whereby development on this Site would not cause or contribute to coalescence, nor undermine the policy constraints in place and allow a new and defensible Green Belt boundary. The boundary proposed incorporates a key features of this landscape as noted in the LCA S56 Windlesham Settled and Wooded Sandy Farmland Character Area. The extensive woodland is a typical feature in the wider landscape of this area – and providing one here serves multi value purposes.

6.2.2 In summary, the proposals will provide a valuable area of naturalistic open space, habitat creation, increasing biodiversity, bio-connectivity and providing opportunities for ecology systems to benefit the living experience of any homes provided.

6.2.3 The proposals retain vegetation as existing, create new sustainable alternative green space as identified as a requirement from the Thames Basin Heath Special Protection Area and creates a non-vehicular footpath route, and provides facilities for a care village. The proposals also preserve the strategic gap between the Snows Ride area of Windlesham and Sunningdale.

6.2.4 Overall, the proposals represent a key opportunity to make a significant contribution to the need for care provisions in the Borough. The Site demonstrates good potential if developed in an imaginative and landscape sensitive way as required by the NPPF.

6.3 Conclusions

6.3.1 This Green Belt Statement has been prepared by James Blake Associates on behalf of Woodbridge Group to explore the potential for development of land east of Snows Ride, Windlesham, Surrey.

6.3.2 This document and supporting photographs provides a detailed assessment of the Site and its contribution to the purposes of the Green Belt set out in the National Planning Policy Framework (NPPF). Consideration has also been given to the Surrey Heath Borough Council Green Belt Review.

6.3.3 Overall, this assessment is generally in accordance with the Green Belt Study. However this assessment has looked at a much finer grain detail and as such the Site is considered to make very little contribution to Green Belt Purposes 1, 2 and 4 (to check the unstricted sprawl of large built up areas, to prevent neighbouring towns merging into one another and to preserve the setting and special character of historic towns), and a low contribution to Green Belt Purpose 3 (to assist in the safeguarding of the countryside from encroachment).

6.3.4 It is considered that the Site is a suitable location for development, and for release of 5.5ha from Green Belt, having a low to medium capacity to accommodate change. Development would be physically and visually connected to the existing settlement of Windlesham along Snows Ride. With new tree planting typologies throughout any proposed development would help integrate the built structures within the local landscape character. Through good design development of the Site would be able to provide Green Infrastructure benefits to positively enhance their beneficial use, such as looking for opportunities to provide access, to provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land.

6.3.5 In terms of openness, it is acknowledge that the increased level of built form on the Site will alter the level of openness in certain areas, however, it will give rise to opportunities for improvements in public access to the Site. Furthermore, it presents the opportunity to strengthen the Green Belt boundary to areas of settlement, new and existing at Snows Ride. It is considered that the proposed development would have little impact on the openness of the Green Belt.

6.3.6 Release of 5.5ha of land from the Green Belt and establishment of the new defensible Green Belt boundary would have limited effects on the ability of the remaining Green Belt land to perform the purposes and functions of the Green Belt, and the Site would form a logical extension to the existing built up area of Windlesham at Snows Ride.

APPENDIX A: CRITERIA FOR ASSESSING SENSITIVITY

APPENDIX A: Criteria for Assessing Sensitivity

Table A1: Landscape Value and Susceptibility

Level	Value	Susceptibility
	Landscape elements that are in good to excellent condition and are a fundamental component of landscape character. Alternatively a distinctive or rare landscape.	<ul style="list-style-type: none">• Very low potential for mitigation.• No potential for substitution or replacement.
High	No urbanising influences, the landscape has an unspoilt open/rural character. Highly tranquil. Existing land use is considered an appropriate land use with regard to Green Belt policy and which contributes strongly to the functional countryside.	<ul style="list-style-type: none">• No capacity to accommodate the proposed development or change without affecting the baseline situation.
	Landscapes that are in good condition, with a high prevalence of important landscape elements giving rise to a strong or unique character and sense of place.	
	Landscape elements that are in good condition and make a contribution to defining landscape character.	<ul style="list-style-type: none">• Low potential for mitigation.• Very limited potential for substitution or replacement.
	Very few urbanising influences, the landscape generally has an open/rural character. Medium to High tranquility.	<ul style="list-style-type: none">• Limited capacity to accommodate the proposed development or change without affecting the baseline situation.
Medium to High	Existing land use is generally considered an appropriate land use with regard to Green Belt policy and which contributes strongly to the functional countryside. Landscapes that are in good condition with some important landscape elements giving rise to a positive character and recognisable sense of place, although some detracting features may be present.	
	Landscape elements that are in average condition and make a contribution to defining landscape character. Elements may be protected by local planning policy.	<ul style="list-style-type: none">• Some potential for mitigation.• Some potential for substitution or replacement.
	Some urbanising features, the landscape is generally considered to be equal parts urban and rural. Medium tranquility.	<ul style="list-style-type: none">• Some capacity to accommodate the proposed development or change without affecting the baseline situation.
Medium	Site contains some appropriate land uses but also some inappropriate elements, land use or development, countryside functions are provided alongside other landuses. Landscapes that are in average condition with some important landscape elements giving rise to a positive character and recognisable sense of place, although some detracting features may be present.	

	Landscape elements that are in average condition. They may make a limited contribution to the character of the area or their contribution is reduced by their condition. Many urbanising features present which detract from the landscape character of the area. Low to Medium tranquility.	<ul style="list-style-type: none">• Good or significant opportunities for mitigation.• Good potential for substitution or replacement.
Low to Medium	Sites where the majority of the existing land use is considered an inappropriate land use with regard to Green Belt policy and which do not contribute to the functional countryside. Landscapes that are in average condition with evidence of erosion and limited sense of place.	<ul style="list-style-type: none">• Capacity to accommodate the proposed development / change without affecting the baseline situation.
	Landscape elements that are in poor condition. They may make a limited contribution to the character of the area or their contribution is reduced by their condition. An almost completely urban landscape with many features or elements that are uncharacteristic and detract from the landscape character of the area. Low tranquility or not at all tranquil.	<ul style="list-style-type: none">• Very good or significant opportunities for mitigation.• Very good potential for substitution or replacement.
Low	Sites where the existing land use is considered an inappropriate land use with regard to Green Belt policy and which do not contribute to the functional countryside. Landscapes that are in poor condition with evidence of erosion and limited sense of place.	<ul style="list-style-type: none">• Capacity to accommodate the proposed development / change without affecting the baseline situation, or with potential to enhance it.

Table A2: Sensitivity

		VALUE				
SUSCEPTIBILITY		HIGH	MEDIUM TO HIGH	MEDIUM	LOW TO MEDIUM	LOW
	HIGH	High	High	Medium to High	Medium to High	Medium
	MEDIUM TO HIGH	High	Medium to High	Medium to High	Medium	Low to Medium
	MEDIUM	Medium to High	Medium to High	Medium	Low to Medium	Low to Medium
	LOW TO MEDIUM	Medium to High	Medium	Low to Medium	Low to Medium	Low
	LOW	Medium	Low to Medium	Low to Medium	Low	Low

APPENDIX B: DEFINING GREEN BELT PURPOSES

APPENDIX B: Defining Green Belt Purposes

1.1 Defining Green Belt Purposes in Relation to the Site

1.1.1 Paragraph 143 of the National Planning Policy Framework sets out the five purposes of Green Belt. This section looks at each of them to consider how they apply to the Site.

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

1.1.2 For the purposes of this assessment, the large built-up areas in the context of the Borough are taken to include important settled areas, including significant villages, as well as the larger towns. Small hamlets, ribbon development and sparse housing, e.g. small numbers of dwellings along a rural road, are not considered to be part of a large built-up area.

Purpose 2: to prevent neighbouring towns from merging into each other

1.1.3 As highlighted above, for the purposes of this assessment, 'towns' are taken to include important settled areas, including significant villages, as well as the larger town settlements.

1.1.4 When looking at the potential impact of a development on Green Belt Purpose 2 there is a need to look at visibility. For example, if there is a hill between a potential development site and a settlement which prevents inter-visibility between them, the impact on Green Belt purposes is less than it would be if the land were flat and the site could clearly be seen, even if it was two or three miles away.

1.1.5 The Planning Advisory Service guidance note 'Planning on the Doorstep: The Big Issues – Green Belt' 2015, makes specific reference to preventing neighbouring towns from merging into one another: *'Purpose: to prevent neighbouring towns from merging into one another. Green Belt is frequently said to maintain the separation of small settlements near to towns, but this is not strictly what the purpose says. This will be different for each case. A 'scale rule' approach should be avoided. The identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land in between must be taken into account'. The assessment of the contribution that a site makes to the prevention of the merging of neighbouring towns (and, therefore, the impact that the development of a site would have on the separation of settlements) should therefore consider the landscape elements within the 'strategic gap' between the settlements which affects the inter-visibility between the settlements. If the gap consists of interlinked blocks of woodland, views between settlements are likely to be more screened than they would be if the landscape was one of large arable fields with low hedges. Similarly, the topography of the land will affect inter-visibility across a strategic gap between settlements, with an undulating landform likely to be more effective in screening development than flat terrain.*

1.1.6 For the purposes of this assessment 'openness' is considered to refer to the quantum and massing of built form and paved areas (and not any 'sense of openness').

1.1.7 In assessing the Site against Purpose 2, two criteria have been considered:

- The degree of visual encroachment that would be caused by a **residential** development on the site on the 'green gap' between settlements. This considers the effect that landscape features such as woodland blocks and landform would have on the visual obtrusiveness a **residential** development within a strategic gap.
- The degree of visibility of the site from neighbouring settlements, were **residential** development to take place on it.

1.1.8 Each of the two criteria were rated for the importance that the site had in terms of its contribution to preventing neighbourhood towns from merging into each other. This ranged from 'zero importance' for a site where development would make no difference to this purpose through 'low importance', 'moderate importance', 'important' to 'high importance' for sites where development would make the biggest contribution towards the merging of neighbouring settlements.

Purpose 3: to assist in the safeguarding of the countryside from encroachment

1.1.9 When assessing the contribution that a site makes to this Green Belt Purpose, the degree to which both the Site and its surroundings have the characteristics of open countryside needs to be considered. The primary characteristic to be considered is the absence of built development and dominant urban influences. The impact on this purpose of development on a site that at present has such countryside land uses as agriculture, forestry, green recreation and wildlife conservation will be greater than one which is more urban in character. The same is true of the context of the site – a housing development in an area with a strong countryside character will be a greater encroachment into the countryside than one in an area with urbanising features such as industrial or storage units. The landscape character of the Site and surrounding area therefore needs to be considered.

1.1.10 As with Purpose 2, the assessment of the effect of a development on encroachment into the countryside involves a consideration of the visual impact on open countryside. A development which is primarily visually connected to an urban area (through proximity, landform and/or screening) will encroach on the countryside less than one which is more visible from receptors within the open countryside.

1.1.11 Another factor which affects the effect that the development of a site would have on the open countryside is its landscape sensitivity. This can be assessed by assessing the landscape value of the site in terms of the characteristics of open countryside and using the standard methodology of a Landscape and Visual Impact Assessment to assess the site's Landscape Susceptibility (vulnerability to change). These two parameters can be used to reach an assessment of Landscape Sensitivity. The development of a site with a high landscape sensitivity would have a greater impact on the open countryside than one with low sensitivity and would therefore contribute more to this Green Belt Purpose.

1.1.12 The final factor to consider in assessing the degree of encroachment of the open countryside that would be caused by the development of a particular site is the strength, defensibility and permanence of the new Green Belt boundary that would be created. A strong new boundary (such as a topographic feature or railway line) would act as a defence against further encroachment during and beyond the duration of the Local Plan whereas a weak new boundary (such as a fence or hedge) would make it more likely that further encroachment will take place.

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

1.1.13 There is no strict legal or planning definition of a 'historic town' in reference to Green Belt Purpose 4. Some Boroughs may not contain any nationally recognised 'Historic Towns'; however, this does not mean the individual settlements within the Borough do not have an historic character with important aspects that have defined settlement patterns and the overall landscape character of the area.

1.1.14 For the purposes of this assessment relationships to Conservation Areas have also been considered.

Purpose 5: to assist in urban regeneration

1.1.15 All Green Belt land is considered to contribute equally to fulfilling this purpose. It has therefore been excluded from this assessment.

Assessment of Green Belt Purposes

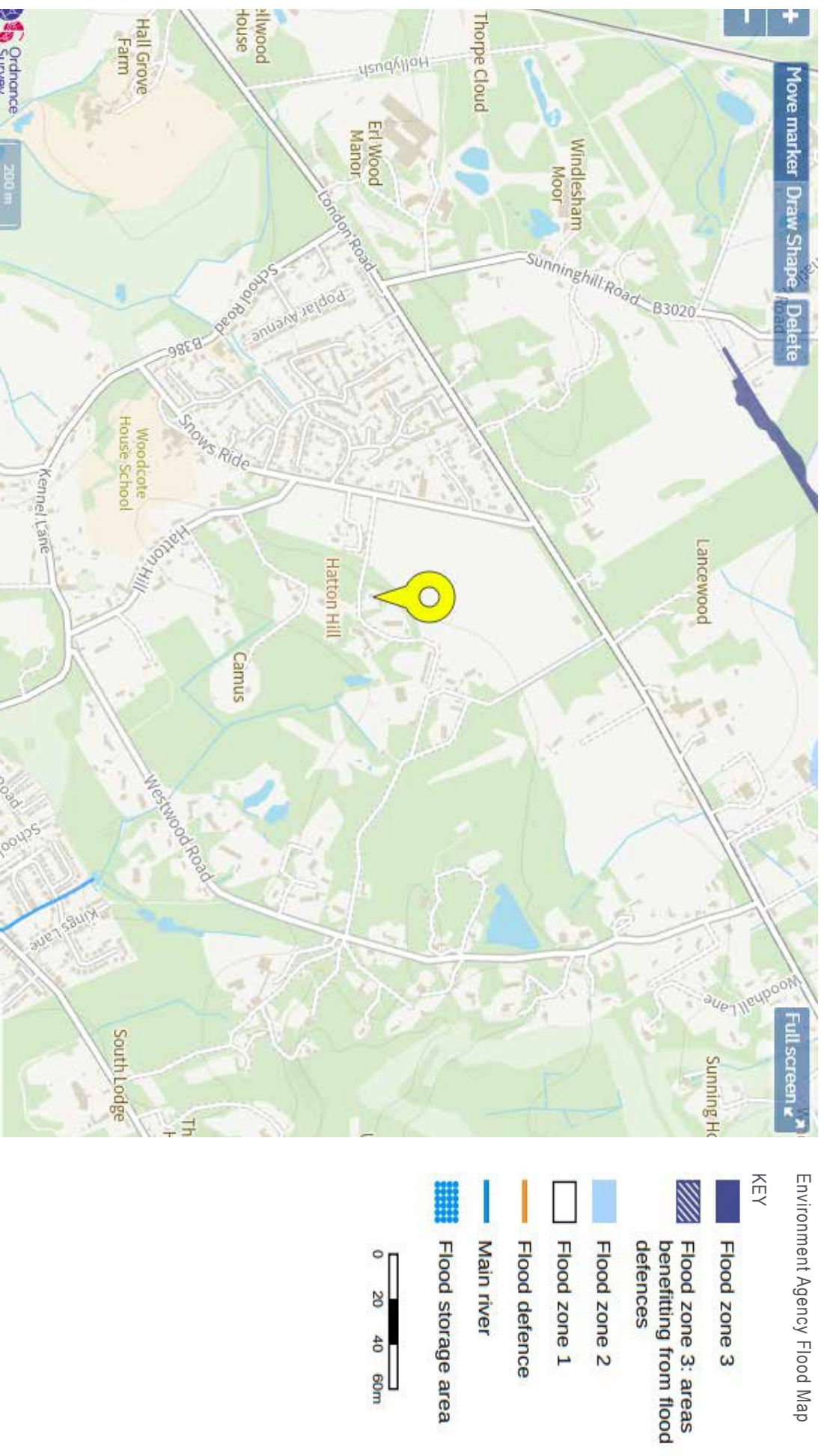
Purpose 1: to check the unrestricted sprawl of large built up areas				
Relative contribution to Green Belt purposes				
Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Comments				

Purpose 2: to prevent neighbouring towns merging into one another					
Criteria	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Effect on the visual 'green gap'	No encroachment	Some/little encroachment	Moderate encroachment	Large-scale encroachment	Significant encroachment
Views between settlements	Neighbouring settlements not visible	Glimpsed views from neighbouring settlements	Views from neighbouring settlements partly obscured	Fairly clear views from neighbouring settlements	Clear views from neighbouring settlements
Relative contribution to Green Belt purposes					
Zero Importance	Low Importance	Moderate Importance	Important	High Importance	
Comments					

Purpose 3: to assist in safeguarding the countryside from encroachment					
Criteria	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Permanence of green belt boundaries following development	Definitive	Strongly defensible	Moderately defensible	Weakly defensible	No defensible boundary
Character	Significant built form within and/or around the site	Strong urban character, not perceived as open countryside	Notable urban context,	Strong/largely rural character	Unspoilt open, rural character
Sensitivity	Low	Low to Medium	Medium	Medium to High	High
Relative contribution to Green Belt purposes					
Zero Importance	Low Importance		Moderate Importance	Important	High Importance
Comments					

Purpose 4: to preserve the setting and special character of historic towns				
Relative contribution to Green Belt purposes				
Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Comments				

APPENDIX C: FLOOD RISK EVIDENCE



APPENDIX D: GREEN INFRASTRUCTURE STRATEGY PLAN

GREEN INFRASTRUCTURE STRATEGY PLAN

LANDSCAPE VISION

- The landscape strategy plan sets out the level of strategic spatial arrangement envisaged for the Site in order to provide a high quality landscape setting and strong green infrastructure framework to the proposed buildings. The landscape objectives of the Proposed Development include:
- Create a substantial area of Sustainable Alternative Natural Greenspace (SANG) responding to the requirements of the Thames Heath Special Protection Area (SPA) buffer zone.
- Development of strategic green infrastructure to create a framework for development.
- Inclusion of new walking routes around and through the site, allowing public access and use of the SANG.
- Additional planting to screen soften potential views from properties on Windlesham Court.
- To ensure retention and enhancement of existing vegetation within the Site and on Site boundaries, ensuring nature conservation habitats for a range of locally occurring species.
- Use of historic hedgerows and tree lines to help define some of the development opportunities within the Site.

RESIDENTIAL AREAS

The residential development will incorporate areas of subtly different characters to define and create a sense of place. Development frontages should face outwards towards open space and street scenes to ensure that rear garden boundaries are hidden and not a feature to the street scene. As a result, planting will be designed to respond to the individual character areas. Semi native and ornamental hedges and ornamental shrub beds should be used in more formal areas to define the street and soften the built form. There is the potential for development parcels to respond to the historic sub-division of the Site, by using the historic hedgerow and tree lines to create development parcels and tree lined streets. In other areas planting has the potential to be more rural in character with strategic planting used to soften the development edge and open spaces. Native species will be used adjacent to open spaces and along the Site boundaries to create an appropriate transition to the surrounding area. Appropriate street trees will be used within the residential areas to soften built form and frame local views. A ha-ha or deep swale feature can be used along the outer edge of the development as a natural security boundary and to seamlessly connect the development area to the wider open green space.

SUSTAINABLE ALTERNATIVE NATURAL GREENSPACE (SANG)

As the Site lies within 5km of the Thames Heath Special Protection Area (SPA) there is a responsibility for the site to make a contribution to SANG, this includes semi-natural varied habitats (other than woodland), a circular unsurfaced and well maintained walking route. As part of this there is the potential to create wild flower meadow habitats, drainage pond, provision of individual trees and areas of layered tree and shrub planting. Informal and sensitively sign posted access into the SANG and to the walking routes habitat will contribute to healthy lifestyles and quality of life.

BIODIVERSITY ENHANCEMENT AND GREEN LINKS

All strategic planting will incorporate species that are native and locally appropriate to the area, plant stock will be of local provenance where possible. Existing boundaries will be enhanced to reinforce and expand ecological corridors throughout the Site and to the wider Site setting where possible. These corridors will create habitat and foraging opportunities for local fauna and connect Site features.

Green links throughout the development have the potential to connect areas of public space and link the development to the wider landscape.

The use of a swale feature along the development edge can increase the biodiversity around the site whilst also providing a natural defensible boundary to the development area.

GREEN INFRASTRUCTURE

Existing boundary hedgerows and trees will be retained (with buffers to development), reinforced and brought into regular, long-term management. This will protect visual amenity and landscape character as well as continuing to offer commuting and foraging opportunities for wildlife.

Multi-functionality is central to the green infrastructure concept and approach. It refers to the potential for green infrastructure to have a range of functions, to deliver a broad range of ecosystem services. The provision of



Species rich grassland and trees for SANG creation



Native hedgerow



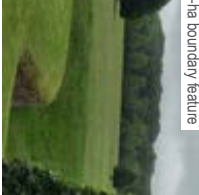
Proposed street trees



Proposed large trees for open space



Typical ha-ha boundary feature



Swale with wildflower planting



Native buffer planting mix to integrate with existing vegetation on the Site boundaries

KEY TO STRATEGY PLAN

- Red line boundary
- Development edge, property frontages to back outwards
- Primary vehicle access
- Private residential access
- Key pedestrian / cycle link
- Circular walking route
- Defensible boundary swale feature
- Wildflower meadow
- Goose field
- Proposed layered native tree and shrub planting, to strengthen boundaries and contribute to a wider network of ecological corridors
- Proposed pond
- Sustainable drainage basin
- Existing retained vegetation
- Key Views



Woodland edge habitats



Woodland



Goose field

JBA 22105
SK01 Green Infrastructure Strategy Plan

Drawn by	Site
PC	Land at Snobs Ride, Windlesham, Surrey
Client Name	Woodridge Group
Client Name	Woodridge Group

James Blake Associates Ltd.
Land at Snobs Ride, Windlesham, Surrey

James Blake Associates

Land east of Snows Ride Green Belt Assessment Field Study Checklist

Assessment of Sensitivity

Landscape Value

Which of the following landscape elements are present on site and what is their condition?					
Woodland block elsewhere	Excellent	Good	Fair	Poor	N/A
Boundary tree belt	Excellent	Good	Fair	Poor	N/A
Grassland elsewhere	Excellent	Good	Fair	Poor	N/A
Native hedge elsewhere	Excellent	Good	Fair	Poor	N/A
Ornamental hedge	Excellent	Good	Fair	Poor	N/A
Specimen trees - other native species	Excellent	Good	Fair	Poor	N/A
Specimen trees - ornamental	Excellent	Good	Fair	Poor	N/A
What land uses are present on site?	Agricultural	Equine	Industrial/Commercial	Open Access	
	Parkland	Sport/Recreation	Residential	Other	
To what degree is the land use on site typical of the countryside?	Completely typical	Highly typical	Moderately typical	Slightly typical	Not at all typical
To what degree is the land cover on site natural?	Completely natural	Mostly natural	Equal parts natural and urban	Mostly urban	Completely urban
What is the field pattern on site?	Regular		Irregular*		N/A
Are any of the following buildings present on site?	Residential	Commercial	Industrial	Agricultural	
	Sheds	Stables	Car Parking	Other	
Which building materials are used on site?	Brick and Flint*	Brick	Render	Stone	
	Timber	Concrete Block	Metal	Other	
What opportunities are there for public recreation on site?	Bridleway	Footpath	Permissive Path	Unofficial Path	None
What degree of tranquillity is experienced on site?	High	Medium to High	Medium	Low to Medium	Low
What is the scale of views from within the site?	Expansive	Open	Semi-enclosed	Enclosed	
How representative of the local landscape character the site?	Significantly representative	Highly representative	Moderately representative	Slightly representative	Not at all representative

Susceptibility

APPENDIX E: FIELD STUDY FORMS

Potential for mitigation	Very low	Low	Some	Good	Very good
Potential for substitution, replacement or restoration of features	Very low	Low	Some	Good	Very good
Capacity to accommodate development without affecting baseline	Very low	Low	Some	Good	Very good
Effect of development on management and policy objectives	Substantially contradicts	Contradicts	Partly in accordance	Generally in accordance	Entirely in accordance

Assessment of Green Belt Purposes

Purpose 1: to check the unrestricted sprawl of large built up areas					
To what degree would development on the site encroach on the openness of the countryside?	Substantial, large-scale encroachment	Large-scale encroachment	Some encroachment	Little encroachment	No encroachment
How is the site contained?	Not at all contained	Few links to built up area	Linked to built up area	Within a built up area	Fully contained
How strong is the existing urban boundary?	No boundary	Weak boundary	Moderate boundary	Strong boundary	Very strong boundary
Purpose 2: to prevent neighbouring towns merging into one another					
What degree of physical screening separates the site from surrounding settlements?	No barriers	Few barriers	Some barriers	Many barriers	Completely obscured
What are the visual barriers?	Landform	Vegetation	Buildings (residential)	Buildings (industrial)	Other
What effect would there be on the visual green gap if the site were to be developed?	Complete loss	Major loss	Some loss	Limited loss	No effect
Purpose 3: to assist in safeguarding the countryside from encroachment					
What forms the site boundaries?	A Road	B Road	Minor Road	Railway Line	Water Course
	Woodland	Other Vegetation	Track/Public Right of Way	Fence	Other
What level of permanence do these boundaries currently have?	Definitive	Strong defensible boundary	Moderate defensible boundary	Weak defensible boundary	No defensible boundary
What level of permanence will these boundaries have following development?	Definitive	Strong defensible boundary	Moderate defensible boundary	Weak defensible boundary	No defensible boundary
Purpose 4: to preserve the setting and special character of historic towns					
What level of intervisibility is there between the site and Sunningdale or Bagshot?	Significant intervisibility	Strong intervisibility	Moderate intervisibility	Limited intervisibility	No intervisibility
Which heritage features are visible from the site?	Scheduled Monument	Grade I Listed Building	Grade II(*)/Listed Building	Conservation Area	Registered Park or Garden
How prominent is the site in the landscape setting of the heritage features?	Significantly prominent	Highly prominent	Moderately prominent	Slightly prominent	Not at all prominent

Appendix 8 – Assessment of Proposed SANG against Natural England Criterion

Natural England criteria for SANGs to mitigate impacts on the Thames Basin Heaths SPA

Land east of Snows Ride, Windlesham

Essential Criterion	Proposed SANG, east of Snows Ride, Windlesham
For all sites larger than 4ha there must be adequate parking for visitors, unless the site is intended for local use, i.e. within easy walking distance (400m) of the developments linked to it. The amount of car parking space should be determined by the anticipated use of the site and reflect the visitor catchment of both the SANG and the SPA.	<p>The proposed SANG will be within easy walking distance of the proposed new Care Village, and will also be within walking distance for the existing residents of Snows Ride.</p> <p>A small car park can be provided at the north east end of the SANG, which would provide easy access for a wider catchment off London Road, and would give direct access into the SANG. It could provide parking spaces for 15-20 cars and bikes. The entrance would have a height restriction barrier to prevent access by caravans etc.</p>
It should be possible to complete a circular walk of 2.3-2.5km around the SANG.	A 2.3 km circular walk is possible within the SANG. In areas where the path comes closer to other sections of the walking route, new planting will be used to shield views of other walkers. In addition, a more formal walking/cycling route is proposed along Snows Ride and between the development and the northern woodland belt along London Road
Car parks must be easily and safely accessible by car and should be clearly sign posted.	The car park is located in previously agreed location, accessed off London Road.
The accessibility of the site must include access points appropriate for the particular visitor use the SANG is intended to cater for.	There would be no restrictions on access throughout the SANG (apart from fencing around new planting). Substantial open areas where dogs can run free and safely off the lead are proposed. Consideration may need to be given to path surfacing in places, where there is wet ground. Given the proximity to

	<p>the Care Village, consideration should also be given to part of the route around the edge of the Care Village being surfaced, so it can be used by people in wheelchairs and those with restricted mobility. Additional provision of benches should also be considered.</p>
<p>The SANG must have a safe route of access on foot from the nearest car park and/or footpath/s.</p>	<p>There will be direct access from the Care Village at various places, and there will also be direct access from the car park at the north east end of the SANG. New/ upgraded footways are proposed, to improve access to the proposed SANG from the existing residential area to the west.</p>
<p>All SANGs with car parks must have a circular walk which starts & finishes at the car park.</p>	<p>The proposed circular path incorporates the proposed car park, and an access point for existing residents to the west (in the south west corner of the proposed new SANG). The circular path will also be linked to access points from the Care Village.</p>
<p>Paths must be easily used and well maintained but most should remain unsurfaced to avoid the site becoming too urban in feel.</p>	<p>The circular route will be surfaced in wet locations. Such an approach is widely accepted by Natural England on other SANGs. The paths will be mown initially and thereafter, it is anticipated they will be maintained by trampling (restricting vegetation growth). The soils on site are poorly draining and there could be muddy areas that may require localised drainage. Given the proximity of the Care Village there is a case for part of the SANG access (along the edge of the Care Village) to be surfaced.</p>
<p>SANG must be perceived as semi-natural spaces with little intrusion of artificial structures, except in the immediate vicinity of car parks. Visually-sensitive way-markers and some benches are acceptable.</p>	<p>The proposed SANG will have a diversity of natural spaces, including wildflower meadow, grass 'common' land, inundation wet areas, new structural planting and specimen trees. Existing features of the site including mature trees and the ditch further contribute to the diversity of recreational experience.</p>

All SANGs larger than 12 ha must aim to provide a variety of habitats for users to experience.	The SANG is less than 12 ha, but will provide four distinct habitats, wildflower meadow, grassy common, ponds and woodland. Existing mature trees, enhancement planting, and a variety of structure planting will further add to the diversity of habitats and recreational experience.
Access within the SANG must be largely unrestricted with plenty of space provided where it is possible for dogs to exercise freely and safely off lead.	Dogs are able to roam freely throughout the terrestrial habitat within the SANG, with the boundaries being largely defined by the existing boundaries. Boundary fences will need to be improved to ensure they are dog secure.
SANG must be free from unpleasant intrusions (e.g. sewage treatment works smells etc).	There are no unpleasant intrusions affecting the Site.
SANG should be clearly sign-posted or advertised in some way.	The SANG is intended primarily for local use. For visitors arriving on foot, pedestrian entrances will be provided at various points, ensuring easy access from the Care village and existing residential area to the west. The car park that can be provided will would make the SANG available to a wider catchment, and sign posting to the car park would be provided.
SANGs should have leaflets and/or websites advertising their location to potential users. It would be desirable for leaflets to be distributed to new homes in the area and be made available at entrance points and car parks.	The proposed SANG is primarily for local use, and as such maps and information boards will be provided at the SANG entrances. A leaflet for local people showing walking access points, and plan of the route within the SANG (and the points of interest) can be provided.

Desirable Criteria	Proposed SANG, east of Snows Ride, Windlesham
It would be desirable for an owner to be able to take dogs from the car park to the SANG safely off the lead.	Access directly from the carpark into the SANG will be provided.
Where possible it is desirable to choose sites with a gently undulating topography	The site has a gently undulating topography with a low point in the south (62.5m) and high ground in the east and north of the site (72.5m).
It is desirable for access points to have signage outlining the layout of the SANG and the routes available to visitors.	Interpretation boards will be provided to include a map of the Site, entrances and routes within the SANG, including the circular walk.
It is desirable that SANG provide a naturalistic space with areas of open (non-wooded) countryside and areas of dense and scattered trees and shrubs. The provision of open water on part, but not the majority of sites is desirable.	The proposed SANG will have a diversity of natural spaces including wildflower meadow, grass common, marshy ground, new structural planting, specimen trees and open water. Existing features of the Site will be retained, including mature trees and perimeter mature woodland.
Where possible it is desirable to have a focal point such as a view point, monument, etc, within the SANG.	A view point on the high ground is proposed with perhaps a bench or fallen tree log for sitting on. The other focal point is the SUDS pond. Benches can be positioned across the SANG

Appendix 9 – Sustainability Appraisal Comparison Table

Interim Sustainability Appraisal

Comparison Between Growth Scenario 2 and Land East of Snows Ride, Windlesham:

	Growth Scenario 2		Land east of Snows Ride, Windlesham	
	SA Performance	Commentary	SA Performance*	Commentary
Accessibility	3	The ISA suggests that none of the smaller GB sites under consideration would deliver new strategic community infrastructure that would benefit existing communities. Concern is explicitly expressed around higher growth at Windlesham, given the lack of a primary school, and the poor links between the main village core and Snows Ride.		The proposals for land east of Snows Ride would deliver new strategic community infrastructure (that would benefit the existing community of Snows Ride), in the form of 10ha of publicly accessible recreation land (with scope, potentially, to also deliver new play provision). The proposed Care Village would not generate any need for primary school places, and importantly, the Care Village would incorporate a range of on-site services for the new residents, limiting the need for trips to the village core. It should also be noted that there are a range of day to day facilities and services accessible from the site (see accompanying representation).
Air Quality	2	Sites adjacent to the A30 could experience a degree of air pollution, and higher growth in the Green Belt settlements would be likely to generate traffic along a-roads that pass through the centre of villages/ residential areas.		The Care Village on land east of Snows Ride would have a low trip generation rate, adding a negligible number of car movements along the A30. Indeed, the proposed 10ha of recreation land, accessible on foot for existing residents of

		<p>However, importantly, the ISA concludes that the referenced concerns are 'of limited significance' with 'neutral effects predicted for all three scenarios'.</p>		<p>the Snows Ride area, would have the potential to reduce localised car borne trips for leisure purposes. There is more than adequate space on the site to ensure an appropriate off-set from the A30, to address any concerns around noise and air quality.</p>
Biodiversity	2	<p>Concerns are raised around the potential need, under this scenario, to allocate land in very close proximity or even adjacent to the TBHSPA 400m buffer. A footnote suggests "it is unlikely (or at least, unclear) that any of the Green Belt sites in this scenario could deliver onsite SANG". The ISA also raises concerns around the potential impacts of development on mature woodland, forestry, trees and hedgerows, and the potential for impacts on other designated wildlife sites. It does recognise that there could be potential for development to support some targeted habitat enhancement / creation.</p>		<p>The land east of Snows Ride is over 1.3km (as the crow flies) from the outer edge of the TBHSPA 400m buffer. Importantly, as set out in the accompanying consultation response, the land east of Snows Ride <u>is</u> capable of delivering on-site SANG, and the initial work undertaken to design this SANG, demonstrates the scope to deliver at least a 20% biodiversity net gain. Existing trees, areas of woodland and hedgerows can be retained and enhanced as part of the proposed development, alongside the creation of new habitats, and the planting of more trees etc. Overall, a positive score in relation to biodiversity is appropriate.</p>
Climate Change Adaptation	2	<p>The ISA confirms that the primary consideration is flood risk. It is suggested that under scenario 2 there</p>		<p>All of the land east of Snows Ride is situated in Flood Zone 1, and is not associated with any river corridor. There are some parts of the site identified as</p>

		would be pressure to deliver new homes in flood Risk Zone 2.		being at medium or high risk of surface water flooding, but this can be fully addressed through the design and layout of the 10ha SANG, (with the provision of on-site attenuation features). Indeed, a betterment over greenfield run-off rates will be achievable, providing a localised benefit in terms of the risk of surface water flooding.
Climate Change Mitigation	3	The key consideration in relation to this criterion is per capita built environment emissions. It is suggested that given the modest scale of the sites proposed under scenario 2, there is little reason to suggest any particular opportunity for addressing built environment emissions. The ISA does conclude that it is appropriate to flag for all of the scenarios “a negative effect of limited or uncertain significance”.		Whilst the detailed plans for the proposed Care Village need to be worked up, there is no reason why measures to minimise regulated operational emissions could not be included (for example, high fabric/ efficiency standards, rooftop solar PV etc.). Similarly, there will opportunities to address non-operational emissions.
Communities	3	Against this assessment criterion a range of issues are considered. It is suggested that because the majority of the shortlisted Green Belt sites under Scenario 2 are small sites, they would deliver little benefit to the existing community, and potentially lead to notable negative impacts, e.g.		The proposals for land east of Snows Ride would deliver new strategic community infrastructure (that would benefit the existing community of Snows Ride), in the form of 10ha of publicly accessible recreation land (with the potential scope to also deliver new play provision, if required).

		<p>pressure on existing community infrastructure and traffic through residential areas. More specifically, the ISA states “..the Snows Ride area of Windlesham potentially stands out as a location where there is a growth related opportunity, given the lack of a local centre, and given that this is the location of the largest of the shortlisted sites. It is not anticipated that growth could deliver a primary school, but it is possible to envisage new community infrastructure (e.g. a new play facility, or perhaps even a small local centre with a village hall) and/or new strategic greenspace to the benefit of the existing community.”</p>		<p>The proposed new Care Village would place little additional pressure on existing community infrastructure, with the Care Village incorporating a range of on-site facilities and services for the new residents (including a restaurant, treatment rooms, and leisure facilities). In a similar vein, the limited trip generation associated with a Care Village, and the opportunity for more existing local residents to recreate locally, should mean there are no issues with increased traffic through residential areas (a concern raised in the ISA).</p>
Economy and Employment	2	<p>The ISA notes that under scenario 2 it is unlikely that any of the sites in question would deliver new employment land. In addition, it is suggested that there is a risk of problematic traffic congestion impacting on businesses.</p>		<p>Scenario 2 of course includes the constant supply components associated with scenario 1, and therefore would deliver the same positive benefits identified in the ISA (for scenario 1). More specifically, the Care Village would generate a range of local employment opportunities. The proposals for land east of Snows Ride include the potential for provision of some key worker accommodation, to ensure essential key workers can afford to live locally.</p>

			For the reasons set out above, the proposed development on land east of Snows Ride would not result in any 'problematic traffic congestion impacting on businesses'.
Historic Environment	3	<p>The ISA notes that under scenario 2, the shortlisted sites could extend modern housing estates into countryside with limited sensitivity (e.g. at Windlesham). The concerns raised in relation to the historic environment, in terms of scenario 2, mainly relate to specific sites at West End and Bisley, and the southern part of Chobham.</p> <p>The ISA does reference the land at Snows Ride, stating that it may be associated with a degree of sensitivity, in that it incorporates a large field that is shown on historic OS maps as comprising part of the landscaped grounds associated with Windlesham Court (which remains, but is not locally listed).</p>	<p>There are no listed buildings within or adjacent to the land east of Snows Ride. The nearest designated heritage asset is a Grade II listed Milestone on the A30 / London Road, dating back to the mid-18th century, approximately 500m to the west of the site.</p> <p>The historic use of the large field, as part of the grounds associated with (not listed, or locally listed), Windlesham Court, has been taken into account as part of the design of the 10ha of recreation / SANG land.</p>
Housing	2	<p>The ISA scores all of the scenarios positively in terms of housing delivery. The housing sites included under scenario 2 are felt to perform well from</p>	<p>The land east of Snows Ride is of course unconstrained agricultural land (other than in terms of its current Green Belt designation). The land is in a single</p>

		a 'housing' perspective, because they tend to be associated with low delivery risk, and tend to be capable of being delivered relatively early in the plan period (albeit few of the shortlisted sites simply comprise unconstrained agricultural land).		ownership, and there is significant market interest. Importantly, the land east of Snows Ride would help address the need for housing with care in Surrey Heath Borough. The Local Plan evidence base identifies a significant need for additional housing with care, and presently, the Local Plan does little to proactively ensure the needs of the ageing population in Surrey Heath will be met.
Land, Soils and Resources	2	The ISA flags concerns in relation to scenario 2, principally around the potential loss of Best and Most Versatile (BMV) agricultural land.		The land east of Snows Ride is used for the grazing horses (not food production). The provisional agricultural land quality dataset shows the land east of Snows Ride as an area of Grade 4 agricultural land.
Landscape	3	The ISA notes that most, if not all, of the shortlisted sites fall within parcels that contribute to at least one of the nationally defined Green Belt purposes, with some of the sites performing strongly in Green Belt terms. With regards to Windlesham, the ISA notes that one consideration is potentially the risk of problematic urban sprawl along the A30, noting the recently		The Wooldridge Group have commissioned a finer grained, landscape led assessment of the Green Belt land east of Snows Ride. This work concurs with the Council's findings in terms of Green Belt purposes 1 (to check the unrestricted sprawl of large built up areas) and 4 (to preserve the setting and special character of historic towns) – concluding that the land east of

		<p>permitted garden centre redevelopment scheme between Snows Ride and Broomhall. However, the ISA notes that the land to the east of Snows Ride appears to be well-screened from the road by a tree belt, and there are no public rights of way in the vicinity (indeed, there is only one public right of way linking to Snows Ride, potentially suggestive of a growth-related opportunity).</p>		<p>Snows Ride fulfils no function in respect of these purposes.</p> <p>As noted in the ISA, the deep belt of trees on the northern boundary of the site serves to screen the land from views along the A30. This tree belt could be further enhanced, ensuring that the proposed development would not contribute to linear development along London Road.</p> <p>It is considered the land east of Snows Ride makes very little contribution to Green Belt purpose 2 (preventing neighbouring towns merging into one another), as evidently, the form of development proposed would not bring about any level of settlement coalescence (between Sunningdale and Windlesham, Snows Ride).</p> <p>In relation to Green Belt purpose 3 (to assist in safeguarding the countryside from encroachment), if the existing mature vegetation boundaries are retained, development is generally restricted to 2 storey height, and a new, strong woodland Green Belt boundary is created, it is considered there will be little to no impact (on Green Belt purpose 3)</p>
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			beyond the site's well contained boundaries.
Transport	2	<p>The ISA raises significant concerns in relation to scenario 2. It is suggested that whilst there can be transport arguments in support of growth at villages, for example where the effect is to support local community infrastructure, transport infrastructure (e.g. new walking or cycling paths) or bus services, no particular opportunities have been highlighted to date.</p> <p>The ISA suggests that the two northern-most shortlisted sites stand-out as being associated with the greatest merit in transport terms. One of these sites is the land east of Snows Ride (site 809) located adjacent to the A30 - thereby reducing concerns regarding traffic generation and enabling good access to bus services (including to Bagshot station to the west and Sunningdale station to the east, both of which are within 2.5km). The ISA also notes that there is a footpath along the A30, but no cycle path).</p>	<p>The proposals for land east of Snows Ride include 10ha of new, locally accessible recreation/ SANG land, affording existing and new residents the opportunity to recreate locally (without the need to travel by car). New footpath provision is proposed to connect the Snows Ride area with the proposed new recreation land, and there is also proposed new footpath and cycleway provision through the site.</p> <p>Further, as noted in the ISA, residents of the proposed Care Village will have access to the bus services that connect with the nearby railway stations. On site facilities and services within the Care Village will reduce residents' need to travel, although as demonstrated in the appended Sustainable Transport Strategy, there is a good range of existing nearby facilities and services serving many day-to-day needs.</p>

Water	2	The ISA confirms that the primary consideration here is in respect of the capacity for wastewater treatment. Some concern is flagged in relation to development at Bagshot, Windlesham, West End and Bisley, as none of these settlements benefit from a local wastewater treatment works, leading to a need to pipe/ pump wastewater, which can give rise to issues and costs.		Pre-application advice has been sought from Thames Water, whom have confirmed that there is capacity in their Foul Water sewage network for the proposed development.
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* No ranking score is proposed, as a single site cannot be ranked against wider scenarios. Nonetheless, it is clear from the above commentary that the land to the east of Snows Ride performs strongly against the SA objectives, with many of the negative comments in relation to Scenario 2 not applicable to the land east of Snows Ride.

Representation Forms

2. Section I: Key Challenges, Vision and Objectives

Question I – Key Challenges, Vision and Objectives

- Do you agree with the Key Challenges, Vision and Strategic Objectives for the Borough?
- Do you have any other comments or suggestions for this policy area?
(Please refer to pages 26 - 30 of the Local Plan document)

Please include your comments here...





3. **Section 2: Spatial Strategy**

Question 2 – Policy SSI: Spatial Strategy

- Do you agree with the Council’s preferred option for the spatial strategy, as set out in Policy SSI?
- Do you have any other comments or suggestions for this policy area?

(Please refer to pages 32 - 41 of the Local Plan document)

Please include your comments here...



Question 11 – Policy H6: Specialist Housing

- Do you agree with the Council's preferred approach for specialist housing, as set out in Policy H6?
- Do you have any other comments or suggestions for this policy area?
(Please refer to pages 95 - 98 of the Local Plan document)

Please include your comments here...





4. **Section 3: Housing**

Question 6 – Policy HAI: Site Allocations

- Do you agree with the Council’s preferred approach for allocating sites, as set out in Policy HAI?
- Do you have any other comments or suggestions for this policy area?

(Please refer to pages 50 - 67 of the Local Plan document)

Please include your comments here...



7. Section 6: Environment

Question 39 – Policy EI: Thames Basin Heaths Special Protection Area

- Do you agree with the Council's preferred approach for the Thames Basin Heaths Special Protection Area, as set out in Policy EI?
- Do you have any other comments or suggestions for this policy area?
(Please refer to pages 184 - 186 of the Local Plan document)

Please include your comments here...



10. Sustainability Appraisal

Question 59 – Sustainability Appraisal

- Do you have any comments or suggestions in relation to the Sustainability Appraisal?

Please include your comments here...

