

Guildford Green Belt Assessment 2026

Grey belt findings across eight parishes, and the questions West Horsley is putting to the Borough Council

To	Clerks and Councillors of East Horsley, Effingham, West Clandon, East Clandon, Ockham, Ripley and Send Parish Councils
From	West Horsley Parish Council
Date	30 July 2026
Status	Shared for information. No response or action is sought. Every figure and quotation in this document is drawn from Guildford Borough Council's own published evidence base and can be checked against the sources listed at B7.
Scope	All 115 Green Belt assessment areas covering West Horsley, East Horsley, Effingham, Ockham, East Clandon, West Clandon, Ripley, and Send including Send Marsh and Burnt Common.

West Horsley Parish Council has read every published proforma for our own parish and for each of yours. We are sharing the results because the assessment applies one method uniformly across all eight parishes, and several of the findings are unlikely to be obvious from a first reading of the documents. This paper sets out what the assessment actually says, area by area, and the questions West Horsley is putting to the Borough Council.

We are not asking any parish to sign anything, to submit anything, or to agree a common position. West Horsley will make its own representations. This paper is circulated purely so that each council has the same picture of the evidence base for its own area and can decide independently what, if anything, it wishes to do. Nothing here asks any parish to oppose development. The questions are about the quality and transparency of the evidence.

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Part A. Briefing

1. Summary

Guildford Borough Council has published a Green Belt Assessment, prepared by the consultancy AECOM, which examines all 575 Green Belt assessment areas across the borough and identifies which of them meet the Government's definition of grey belt. It was published in July 2026 and has attracted national coverage, including [BBC News](#).

The essential points for the eight parishes:

1. This is evidence, not a decision. The assessment informs the new Local Plan. It allocates nothing, permits nothing and grants nothing. The Council's public position is that identification "does not mean development will happen" and "is not a planning decision" ([BBC News](#)). That is a fair statement of what the document is.
2. The numbers across our eight parishes are substantial. Between us, 115 assessment areas have been examined. Of these, 45 are grey belt and 42 are provisionally grey belt, which is 87 of 115, or roughly three quarters. Only 28 are excluded outright.
3. We hold a disproportionate share of the borough total. Our eight parishes account for a fifth of all assessed areas in the borough but for more than a third of all the grey belt identified anywhere in Guildford (45 of 120).
4. In 114 of the 115 areas, the Green Belt itself was not what protected the land. Only one area in all eight parishes, SE-016 in Send, was judged to contribute strongly to any of the three purposes that determine grey belt status. Every one of the other 27 exclusions was achieved through the separate constraints screen, meaning heritage designations, habitat, flood risk or Local Green Space, rather than through the land being judged valuable Green Belt.
5. Provisional is weaker protection than it sounds. The Council's own FAQs note a pending change to national policy that may remove the constraints test entirely. If that happens, all 42 provisional areas across our eight parishes become simply grey belt, with no further assessment ([GBA FAQs](#), Q16 and Q17).
6. The assessment cannot, by design, consider whether our villages would merge into one another. That is the risk residents care about most, and it is outside the scope of all 115 proformas. The explanation is at section 4.
7. The reasoning is templated to a degree that makes it hard to test. Of the 115 areas, 109 reach no higher than "Weak" against the grey belt purposes, five reach "Moderate" and one reaches "Strong". The wording explaining why is close to identical from area to area, and the underlying measurements are not published.

2. What grey belt is, and how each area was decided

Grey belt entered national planning policy through an update to the National Planning Policy Framework in December 2024. It describes Green Belt land which does not strongly contribute to any of three specific Green Belt purposes set out in NPPF paragraph 143:

- (a) checking the unrestricted sprawl of large built up areas
- (b) preventing neighbouring towns merging into one another
- (d) preserving the setting and special character of historic towns

Land can be grey belt whether or not it has been built on before. It is excluded where certain other national policy constraints, listed in NPPF footnote 7, give a strong reason to refuse or restrict development ([Guildford Borough Council](#)).

Every council in the country has been required to carry out this exercise. Guildford did not invent the category and could not decline to assess. What Guildford does own is the judgement about which specific parcels of land meet the definition, and that judgement is contestable on evidence.

AECOM applied a fixed four way matrix to every assessment area ([Main Report](#), Table 2-9):

Contributes strongly to purpose A, B or D?	Constraints outcome	Conclusion
Yes	not reached	Not grey belt
No	Strong reason, no mitigation possible	Not grey belt
No	Strong reason, mitigation possible	Provisionally grey belt
No	No strong reason	Grey belt

The practical consequence is that there are only two routes to protection. Either the land performs strongly against purposes (a), (b) or (d), which happened once in 115 areas, or a designation happens to sit on it, which is what produced every other exclusion in our eight parishes.

3. The results across the eight parishes

Parish	Areas assessed	Grey belt	Provisionally grey belt	Not grey belt
West Horsley	9	1	7	1
East Horsley	32	14	12	6
Effingham	7	2	2	3
Ockham	3	0	3	0
East Clandon	7	2	2	3
West Clandon	12	7	2	3
Ripley	12	3	2	7
Send, with Send Marsh and Burnt Common	33	16	12	5
Total	115	45	42	28

Send is assessed in two separate proforma sets, 16 areas for Send village (SE) and 17 for Send Marsh and Burnt Common (SM), which Appendix B treats as a distinct settlement although both fall within Send parish.

Borough wide the assessment covers 575 areas, concluding 120 grey belt, 307 provisionally grey belt and 148 not grey belt ([Main Report](#), Table 3-3). Our eight parishes therefore hold 20 per cent of all assessed

areas, 37 per cent of all the grey belt and 14 per cent of all the provisionally grey belt identified in the borough.

4. What this means for our villages

The protection our villages rely on is not Green Belt protection

Across all 115 areas, exactly one was protected by the Green Belt purposes themselves. That is SE-016 in Send, which scores "Strong" on purpose (a) because it adjoins the built up area of Woking and would form an incongruous "finger" of development, and "Strong" on purpose (d) because it adjoins Old Woking Conservation Area and contributes to the setting of a designated historic town.

Every other area in every other parish was recorded as making no more than a weak or moderate contribution to the purposes that now determine protection. Where those areas are nonetheless excluded from grey belt, it is because a listed building, an ancient tree, a conservation area, a habitat designation, a Local Green Space or a flood zone happens to sit on that particular parcel and to cover enough of its surface.

This is the single most important point for councillors in all eight parishes to understand. The countryside between our villages is not, on this evidence base, protected because it is doing a Green Belt job. It is protected only where something else on the land is protected.

Village to village merging is not assessed anywhere

Purpose (b) protects against towns merging. The assessment classifies West Horsley, East Horsley, Effingham, Ockham, both Clandons, Ripley, Send, Send Marsh and Burnt Common, and also Wisley, as villages ([Main Report](#), Table 2-3), and records explicitly that "the PPG is explicit in its clarification that this purpose relates to the merging of towns, not villages" (para 2.5.17). East Horsley is addressed by name: it "has not been included as a town... there is only a handful of shops and no secondary school" (para 2.3.14).

So each of our fields is scored only on its share of a wide strategic gap between two or three towns, a gap in which any single parcel is almost inevitably a "small part". Whether West Horsley and East Horsley would merge along the A246, whether Ripley and Send Marsh would close together along the A3 corridor, or whether the gaps between the Clandons would disappear, is never asked in any of the 115 proformas. Purpose (d) is likewise inapplicable to seven of the eight parishes, because none of those settlements is a historic town. Send is the sole exception, and only because it adjoins Old Woking.

This is a consequence of the national methodology rather than an error by AECOM. It does mean the assessment is structurally incapable of registering the harm residents are most concerned about, and that should be stated clearly in every Local Plan representation the eight parishes make.

Provisional conclusions rest on a coverage percentage, not on the statutory test

Whether a heritage designation blocked grey belt status was decided by what percentage of the area's surface it covers. Between 1 per cent and 95 per cent means mitigation is possible, above 95 per cent means the area is excluded. Table 2-8 of the [Main Report](#) sets out the three scenarios in words only, as "no", "presence of some" and "extensive or total presence". The percentage figures behind those words are not stated anywhere in the Main Report. They appear only in the individual proformas, where the phrases "(between 1% and 95% coverage)" and "(over 95% coverage)" are used 36 and 21 times respectively across the eight parishes. AECOM states plainly that there is "no guidance or agreed methodology" for this part of the work and that its approach was bespoke (para 2.6.1). The percentage bands are AECOM's own construction, not a Government threshold.



That is an area coverage test. It is not an assessment of harm to the setting of a listed building or conservation area, which is the actual statutory test. Guildford applied the proper setting test in July 2026 when it refused a 37 home scheme in Effingham, with officers concluding the land did not qualify as grey belt because of conservation area heritage harm ([Get Surrey](#)). Across the eight parishes, dozens of areas sit in the provisional category on coverage grounds alone, and nobody has yet asked whether development there would harm the settings concerned.

The Council's own FAQs are candid that these conclusions are not settled. It is "only once the scale, form and design of the proposed development is known that one could reach a conclusion on whether the heritage designation provides a strong reason for refusal" ([GBA FAQs](#), Q14). Two consequences follow for all eight parishes. A developer can argue mitigation and seek to convert a provisional area into an effective grey belt case, application by application. And if the anticipated national policy change removes the constraints test, all 42 provisional areas convert automatically, without anyone reassessing a single field.

One presentational trap to be aware of

Most proformas display "Strong Contribution" on the line headed "Purposes A, B, C and D conclusion". Read alone, this is misleading. That score is usually driven by purpose (c), safeguarding the countryside from encroachment, which is not one of the three grey belt purposes and is carried over from a 2013 study. The line that matters sits below it, "Maximum contribution to grey belt purposes (A, B and D)". Residents reading the headline line will reasonably but wrongly conclude that their local field is strongly protected. All eight parishes will face this question at public meetings.

Parish by parish

West Horsley. Nine areas assessed, numbered WH-001, WH-003 to WH-009 and WH-028. Only WH-007 is excluded, because a heritage designation covers more than 95 per cent of it. WH-004 is grey belt outright with no constraints recorded at all. The remaining seven are provisional, held there by listed buildings, ancient trees or habitat. All nine score only "Weak".

East Horsley. By far the largest exposure of the eight, with 14 areas grey belt outright and 12 provisional from 32 assessed. Two areas overlap the Surrey Hills National Landscape, and importantly one of them, EH-021, is still concluded provisionally grey belt, with the National Landscape overlap treated as a constraint capable of mitigation. National Landscape status did not automatically take that land out of scope. EH-001 is the only area in all eight parishes escalated to exclusion on the basis of a "combination and spread of multiple Footnote 7 constraints", which raises the question of what threshold triggers that escalation.

Effingham. Two grey belt and two provisional from seven assessed, with all three exclusions driven by heritage coverage above 95 per cent. EF-002 is one of only five areas in the eight parishes to reach "Moderate". Effingham also carries Berkeley's proposal for up to 600 homes at Effingham Lodge Farm, which expressly relies on grey belt, with an outline application targeted for autumn 2026, and it is where the July 2026 refusal applied the statutory heritage setting test that the assessment itself did not apply.

Ockham. The only parish of the eight with no exclusions at all. All three areas are provisionally grey belt, and none records a constraint worse than "presence of some". Ockham is also the only parish assessed against a three town gap, "the gap between Guildford, Woking and Cobham/Oxshott". None of its three proformas mentions Wisley, Wisley Airfield or any adjacent strategic site, and the Main Report and FAQs mention Wisley only once, as a name in the list of villages, with no reference to Wisley Airfield anywhere in either document.



East Clandon. Two grey belt and two provisional from seven, with all three exclusions driven by heritage coverage above 95 per cent, in each case combined with a habitat finding that on its own would only have produced a provisional conclusion.

West Clandon. The highest proportion concluded grey belt outright of any parish in the group, seven of twelve, with two provisional and three excluded on heritage coverage.

Ripley. The highest exclusion rate of the eight, seven of twelve areas not grey belt, which reflects Ripley's conservation area core. Five of those seven exclusions rest on heritage coverage above 95 per cent, which is to say they rest entirely on the coverage test that AECOM describes as having no agreed methodology behind it. Ripley also has three areas grey belt outright and two provisional. Flood risk appears at RI-007 and RI-011.

Send, with Send Marsh and Burnt Common. The largest area count after East Horsley, 33 in total, with 16 grey belt outright. Send is the only parish where the Green Belt purposes themselves protected land, at SE-016. It is also the only parish where flood risk alone excluded an area, at SE-001, which is recorded as having more than 95 per cent high or medium flood risk coverage. Three Send areas, SE-012, SE-013 and SE-015, reach "Moderate" on purpose (b), the highest concentration of above Weak scores in the group. Send Marsh and Burnt Common are assessed against two different strategic gaps depending on which part of the settlement an area sits in, and SM-001 carries three concurrent constraints without being escalated in the way EH-001 was.

5. The eight questions West Horsley is putting to the Borough Council

These are framed as questions rather than objections, and each is answerable from evidence that Guildford Borough Council or AECOM already holds. West Horsley Parish Council is raising them with the Borough in its own name. They are reproduced here in full so that every parish can see exactly what has been asked, and because most of them bear directly on areas outside West Horsley. Any council is free to use, adapt or ignore them.

1. Publish the site visit record. Does an area level log of the January 2026 site visits exist, and which of the 115 areas in these eight parishes were included? If a log exists, will the Council publish it alongside the assessment?
2. Publish the gap share measurements. Can the underlying measurement of each area's share of the relevant strategic gap be published, so that the distinction between "very small", "small", "relatively small" and "relatively substantial" can be checked? Why do 109 of 115 areas across eight parishes fall on the same side of the Weak and Moderate line?
3. Explain the heritage approach. Where an area is provisionally grey belt solely because a heritage designation covers less than 95 per cent of it, has any assessment been made of harm to the setting of that asset, which is the statutory test the Council itself applied when refusing the Effingham scheme in July 2026?
4. State the cumulative constraint threshold. EH-001 in East Horsley was excluded on the basis of a "combination and spread of multiple Footnote 7 constraints", where each individual constraint was only "presence of some". Other areas with two or three concurrent constraints of the same kind, including SM-001 in Send Marsh, WH-006 in West Horsley and EF-002 in Effingham, were not escalated. What threshold triggers that escalation, and was it applied consistently?
5. Explain how the strategic gaps were assigned. Our eight parishes are assessed against five different gap pairings, Ockham against a three town gap, and Send Marsh and Burnt Common against two different gaps within a single settlement. What determined the gap assigned to each area, and can that

reasoning be published so the resulting share of gap judgements can be understood?

6. Set out how village coalescence will be assessed. Given that purpose (b) cannot capture village to village merging, how will the Local Plan assess the risk of our villages coalescing, along the A246 between the Horsleys, along the A3 corridor between Ripley and Send Marsh, and between the Clandons, and what evidence base will be used?
7. Clarify what happens to provisional areas. FAQ Q17 states that if the NPPF revision proceeds, the assessment "will be re-issued without the Footnote 7 component" and there would be no provisional category at all. Because every one of the 42 provisional areas in these parishes scores no higher than "Moderate" on the grey belt purposes, re-issuing on that basis would move all 42 into grey belt. Will the purposes assessments be revisited at the same time, or will the existing purpose scores simply be carried across?
8. Reconcile the flood risk position. SE-001 in Send is excluded from grey belt on flood risk alone, and the Main Report itself states that Green Belt land in this part of the Wey valley is "in any case highly unlikely to be brought forward for development due to flood risk from the River Wey" (para 2.3.17). How will flood risk and infrastructure capacity be weighed when the Local Plan comes to select sites from the 42 provisional and 45 grey belt areas in our parishes?

6. Points each parish may wish to consider

These are offered as observations, not as recommendations or requests. Each council will reach its own view.

1. Check your own area tables. Part B2 lists every area in your parish with its conclusion and the reason for it. The single most useful thing any council can do is confirm that the record for its own parish is accurate, particularly the constraints listed, because a factual error in a proforma is the easiest thing to get corrected.
2. Note the timing. The Berkeley Effingham Lodge Farm outline application is targeted for autumn 2026 with a decision expected in spring 2027. Representations made while this evidence base is still open carry materially more weight than objections made afterwards.
3. Village coalescence needs separate local evidence. Because the methodology cannot register village to village merging, nothing in this assessment addresses it. Any council concerned about the A246 corridor, the A3 corridor or the Clandon gaps would need its own landscape and gap evidence, since the Borough's evidence base does not contain it.
4. Constructive framing carries further. In our experience the position that survives examination is support for well planned development which respects local character and delivers genuinely affordable homes, alongside resistance to scattered release that quietly merges villages. Opposition framed as blanket refusal tends to be discounted. Opposition framed as evidence critique tends not to be.

7. Talking to residents

West Horsley intends to publish an update for its own residents in due course. Each parish will decide separately whether and how to do the same. Three points are worth getting right in any such update, because getting them wrong will cost credibility.

1. This is not a list of approved development sites. It is an evidence document. Saying otherwise will be corrected by the Borough, and the correction will overshadow the substantive concerns.

2. Provisional is not durable protection. Residents whose nearest field is provisionally grey belt should understand that the category exists because the answer is unresolved, not because the land is safe.
3. National Landscape status did not automatically exclude land. EH-021 in East Horsley overlaps the Surrey Hills National Landscape and remains provisionally grey belt. Residents elsewhere in the group who assume a designation guarantees exclusion should be told otherwise.

A resident session works far better with the maps in the room. Each parish can extract its own area maps from the relevant Appendix B document listed at B7, so that residents can see which fields near them have been assessed and how, rather than debating grey belt in the abstract.

Part B. Technical annexes

The annexes below contain the full underlying analysis for all 115 assessment areas across the eight parishes, together with the assessment methodology, verbatim quotations from the proformas, and the specific points on which the reasoning appears open to challenge.

B1. Methodology, as stated by AECOM and Guildford Borough Council

B1.1 What grey belt means and how it is decided

Grey belt is Green Belt land that "does not strongly contribute to any of" NPPF paragraph 143 purposes (a) unrestricted sprawl, (b) preventing towns merging, and (d) preserving the setting and character of historic towns, and where footnote 7 constraints do not provide a strong reason for refusal ([Green Belt Assessment 2026 page](#); [GBA FAQs, Q4](#)).

The conclusions matrix used for every assessment area (Main Report, Table 2-9, para 2.7.2) is:

Contributes strongly to purpose A, B or D?	Footnote 7 constraint outcome	Conclusion
Yes	not reached	Not grey belt
No	Yes, with no possibility of mitigation	Not grey belt
No	Yes, with possibility of mitigation	Provisionally grey belt
No	No	Grey belt

Source: [Main Report](#), paras 2.7.1 and 2.7.2, Table 2-9.

Only purposes A, B and D count towards grey belt. The report separately assesses purposes C (safeguarding countryside from encroachment) and E (urban regeneration), and the Main Report states explicitly (paras 2.5.2 and 2.5.32) that overall conclusions are drawn twice, once across "all purposes assessed (A, B, C and D)" and once for "the purposes considered in identifying grey belt (A, B and D)". A "Strong Contribution" in the "Purposes A, B, C and D" summary line of a proforma can be driven entirely by Purpose C and is irrelevant to the grey belt conclusion. The separate "Maximum contribution to grey belt purposes (A, B and D)" line is the one that matters. See B4.7.

B1.2 Settlement classification

The Main Report's settlement hierarchy work (section 2.3, Tables 2-2 and 2-3) classifies all eight of our parishes and their settlements as villages, not towns or Large Built Up Areas ([Main Report](#), Table 2-3, p.10). West Horsley, East Horsley, Effingham, Ockham, East Clandon, West Clandon, Ripley, Send, Send Marsh and Burnt Common and Wisley all appear in the villages list. The only settlements classified as

towns or Large Built Up Areas relevant to this study area are Guildford, Ash and Tongham, Woking, Cobham/Oxshott, Bookham/Fetcham and Godalming/Farncombe (Table 2-2).

The report states explicitly on East Horsley (para 2.3.14):

"East Horsley has not been included as a town. It is defined in the 2014 settlement hierarchy as a 'rural service centre' and classified as a village in the adopted Local Plan, but has a small number of services when compared with other towns. There is only a handful of shops and no secondary school in East Horsley."

Consequence for the proformas. Because none of our settlements is a town for assessment purposes, Purpose B as applied to land around them is not about our villages merging with each other. It is entirely about whether each area sits in one of the nine wider strategic gaps between the towns listed at para 2.5.19. Purpose D likewise does not apply to seven of the eight parishes, because a settlement must first be a town to qualify (para 2.3.15) and only Guildford, Woking and Godalming are classified as historic towns (paras 2.3.16 to 2.3.18). This is why every area in West Horsley, East Horsley, Effingham, Ockham, both Clandons, Ripley and Send Marsh and Burnt Common scores "No Contribution" to Purpose D. It is structural, not a site specific finding.

Send is the one exception in the group. Old Woking is designated a historic town for assessment purposes at the suggestion of Woking Borough Council (para 2.3.17), which is why SE-001 and SE-016 receive substantive Purpose D assessments and SE-016 scores "Strong". The same paragraph adds a caveat that matters for site selection: "It is noted, however, that this part of the Green Belt is in any case highly unlikely to be brought forward for development due to flood risk from the River Wey."

B1.3 Purpose scoring thresholds

Purpose A, sprawl of Large Built Up Areas. A PPG based three point scale, split into four by AECOM. To score strongly an area must be free of existing development, lack restricting or containing physical features, and form an incongruous pattern if developed (para 2.5.13). Areas not adjacent or near a Large Built Up Area make "No Contribution" (para 2.5.16). This is why every area in seven of the eight parishes scores No Contribution on Purpose A. SE-016 in Send is the sole exception in the group, because it adjoins the Woking built up area.

Purpose B, merging of towns. A strong score requires forming a "substantial part", defined as more than half, of the gap between two towns, and that development would cause loss of visual separation (Table 2-6, paras 2.5.17 to 2.5.19). Moderate and weak thresholds are calibrated on quantified shares of the gap, described as "relatively substantial" at around a third, "relatively small" at less than a third but not inconsequential, and "small" or "very small" as inconsequential. Across the 115 areas covered here, none scored above Moderate on Purpose B.

Purpose D, historic towns. Structurally inapplicable to seven of the eight parishes. See B1.2.

Purpose C, countryside encroachment, which is not a grey belt purpose. A simple two point scale reused from the 2013 Pegasus Green Belt and Countryside Study. "Contribution" if the area is largely free of development, "No Contribution" if it contains more than incidental existing development (paras 2.5.21 to 2.5.24).

B1.4 Site visits

The Main Report states (paras 2.5.8 and 2.5.9):

"The initial assessment against the purposes has been undertaken as a desk based exercise, supported by analysis of GIS outputs and the use of aerial photography. In recognition of the fact that it is not possible in all cases to reach robust and indisputable conclusions through desk based study alone, site visits were undertaken in January 2026 where necessary to facilitate the development of sound conclusions."

Site visits were triggered by specific circumstances: assessing visual separation for Purpose B, views into and out of historic cores for Purpose D, unreliable or out of date aerial imagery, unverifiable land use, confirming boundary treatments, or validating uncertain desk conclusions (para 2.5.9). The FAQs confirm the same at a higher level (Q10): "The assessment was undertaken using a mixture of desk based GIS analysis, aerial photography and site visits" ([FAQs](#), Q10).

Neither the Main Report nor the FAQs provide an area by area log of which assessment areas received a site visit. See B5.

B1.5 Footnote 7 screening

Footnote 7 constraints considered are biodiversity (SPA, SAC, SSSI and Ramsar sites plus a 400 metre SPA exclusion buffer), Local Green Space, Surrey Hills National Landscape, irreplaceable habitats (ancient woodland, fen and ancient trees), historic environment (scheduled monuments, conservation areas, registered parks and gardens, listed buildings), and flood risk (Main Report section 2.6, paras 2.6.9 to 2.6.17).

Each constraint theme is scored on a coverage percentage basis into three scenarios (Table 2-8):

Scenario	Threshold, using historic environment as the example	Grey belt effect
1. No strong reason	No statutory heritage designations present	No block
2. Strong reason, possibility of mitigation	"Presence of some statutory heritage designations", meaning between 1 per cent and 95 per cent coverage, or the presence of listed buildings	Provisionally grey belt
3. Strong reason, little or no possibility of mitigation	"Extensive or total presence", meaning over 95 per cent coverage	Not grey belt

Source: [Main Report](#), Table 2-8 and para 2.6.5, for the three scenarios; the percentage figures are taken from the Appendix B proformas, which is the only place they appear. The overall footnote 7 conclusion for an area is set by whichever constraint reaches the highest scenario. One scenario 3 finding is sufficient to conclude that the whole area is not grey belt by the footnote 7 route (para 2.6.5). AECOM states this approach was "bespoke" and that "there is no guidance or agreed methodology on undertaking this part of the Green Belt Assessment" (para 2.6.1), so the coverage percentage bands are AECOM's own construction rather than a Government specified threshold.

The FAQs confirm that the provisionally grey belt category exists specifically because of this footnote 7 ambiguity (Q14): "For some constraints it is less clear cut and a definitive conclusion can only be reached once there is a proposal to assess it against... The GBA identifies this type of land as 'provisionally grey belt'." They also flag (Q16 and Q17) that a pending NPPF revision may remove the footnote 7 test altogether, which would convert every provisionally grey belt area in these parishes straight to grey belt.

B2. Area by area tables for all eight parishes

B2.1 West Horsley

Source: [Appendix B, WH, West Horsley](#). Nine areas, all classed "West Horsley (Village)". There is no free text location description field in the proforma template. The only locational information given is an aerial map per area plus the settlement name.

Ref	Purpose A	Purpose B	Purpose D	Footnote 7 headline constraint	Overall grey belt conclusion
WH-001	No Contribution, not adjacent or near a Large Built Up Area	Weak: small part of the Guildford to Bookham/Fetcham gap, unlikely to cause loss of visual separation	No Contribution, not a historic town	Listed buildings present, possibility of mitigation	Provisionally grey belt
WH-003	No Contribution	Weak: small part of the same gap	No Contribution	Irreplaceable habitat, 1 to 95 per cent coverage, possibility of mitigation	Provisionally grey belt
WH-004	No Contribution	Weak: "very small part" of the gap	No Contribution	No footnote 7 constraints found	Grey belt
WH-005	No Contribution	Weak: small part of the gap, structures also prevent intervisibility	No Contribution	Listed buildings present, possibility of mitigation	Provisionally grey belt
WH-006	No Contribution	Weak: small part of the gap, structures also prevent intervisibility	No Contribution	Ancient trees and listed buildings, possibility of mitigation	Provisionally grey belt
WH-007	No Contribution	Weak: small part of the gap, structures also prevent intervisibility	No Contribution	Historic environment, "extensive or total presence... (over 95% coverage)", little or no possibility of mitigation	Not grey belt
WH-008	No Contribution	Weak: small part of the gap	No Contribution	Irreplaceable habitat, 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
WH-009	No Contribution	Weak: small part of the gap	No Contribution	Irreplaceable habitat, 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
WH-028	No Contribution	Weak: "relatively small part" of the gap, structures also prevent intervisibility	No Contribution	Listed buildings present, possibility of mitigation	Provisionally grey belt

West Horsley tally: 1 grey belt (WH-004), 7 provisionally grey belt, 1 not grey belt (WH-007). All nine areas score "Weak" on the maximum contribution to grey belt purposes.

B2.2 East Horsley

Source: [Appendix B, EH, East Horsley](#). Thirty two areas, all classed "East Horsley (Village)". For several areas Purpose B is assessed against the Woking to Bookham/Fetcham gap rather than Guildford to Bookham/Fetcham, reflecting East Horsley's position further from Guildford than West Horsley.

Ref	Purpose A	Purpose B, with gap referenced	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
EH-001	No Contribution	Weak, relatively small part, Woking to Bookham/Fetcham	No Contribution	Combination and spread of multiple footnote 7 constraints: irreplaceable habitat, Local Green Space, heritage, little or no mitigation	Not grey belt
EH-002	No Contribution	Weak, small part, Woking to Bookham/Fetcham	No Contribution	None found	Grey belt
EH-003	No Contribution	Weak, small part, Woking to Bookham/Fetcham	No Contribution	Irreplaceable habitat and Local Green Space, possibility of mitigation	Provisionally grey belt
EH-004	No Contribution	Weak, small part, Woking to Bookham/Fetcham	No Contribution	Local Green Space, possibility of mitigation	Provisionally grey belt
EH-005	No Contribution	Weak, very small part, Woking to Bookham/Fetcham	No Contribution	Irreplaceable habitat and Local Green Space, both "extensive coverage across area", little or no mitigation	Not grey belt
EH-006	No Contribution	Weak, very small part, Woking to Bookham/Fetcham	No Contribution	Irreplaceable habitat and Local Green Space, possibility of mitigation	Provisionally grey belt
EH-007	No Contribution	Weak, small part, Guildford to Bookham/Fetcham	No Contribution	None found	Grey belt
EH-008	No Contribution	Weak, small part	No Contribution	None found	Grey belt
EH-009	No Contribution	Weak, small part	No Contribution	None found	Grey belt
EH-010	No Contribution	Weak, small part	No Contribution	None found	Grey belt
EH-011	No Contribution	Weak, relatively small part	No Contribution	Irreplaceable habitat and Local Green Space, possibility of mitigation	Provisionally grey belt
EH-012	No Contribution	Weak, relatively small part	No Contribution	None found	Grey belt
EH-013	No Contribution	Weak, very small part	No Contribution	None found	Grey belt
EH-014	No Contribution	Weak, small part	No Contribution	None found	Grey belt
EH-015	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	Historic environment, "extensive or total... (over 95%)", little or no mitigation	Not grey belt

Ref	Purpose A	Purpose B, with gap referenced	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
EH-016	No Contribution	Weak, small part	No Contribution	Irreplaceable habitat and listed buildings, possibility of mitigation	Provisionally grey belt
EH-017	No Contribution	Weak, small part	No Contribution	None found	Grey belt
EH-018	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	Local Green Space and listed buildings, possibility of mitigation	Provisionally grey belt
EH-019	No Contribution	Weak, small part	No Contribution	None found	Grey belt
EH-020	No Contribution	Weak, small part	No Contribution	Local Green Space, possibility of mitigation	Provisionally grey belt
EH-021	No Contribution	Weak, small part	No Contribution	Surrey Hills National Landscape overlap, biodiversity and irreplaceable habitat, all possibility of mitigation	Provisionally grey belt
EH-022	No Contribution	Weak, very small part	No Contribution	Surrey Hills National Landscape overlap, biodiversity over 95 per cent and irreplaceable habitat over 95 per cent, little or no mitigation	Not grey belt
EH-023	No Contribution	Weak, small part	No Contribution	None found	Grey belt
EH-024	No Contribution	Weak, very small part	No Contribution	None found	Grey belt
EH-025	No Contribution	Weak, very small part	No Contribution	Irreplaceable habitat over 95 per cent, little or no mitigation	Not grey belt
EH-026	No Contribution	Weak, small part	No Contribution	Irreplaceable habitat, possibility of mitigation	Provisionally grey belt
EH-027	No Contribution	Weak, small part	No Contribution	Irreplaceable habitat, "extensive coverage across area", little or no mitigation	Not grey belt
EH-028	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	None found	Grey belt
EH-029	No Contribution	Weak, relatively small part	No Contribution	Local Green Space and listed buildings, possibility of mitigation	Provisionally grey belt
EH-030	No Contribution	Weak, small part	No Contribution	Ancient trees and Local Green Space, possibility of mitigation	Provisionally grey belt
EH-031	No Contribution	Weak, small part	No Contribution	None found	Grey belt
EH-032	No Contribution	Weak, small part, Woking to Bookham/Fetcham	No Contribution	Flood risk at 50 to 95 per cent coverage, Local Green Space and listed buildings, possibility of mitigation	Provisionally grey belt

East Horsley tally: 14 grey belt, 12 provisionally grey belt, 6 not grey belt. Every area scores only "Weak" on the maximum contribution to grey belt purposes, so no area is stopped from grey belt status by the purposes test itself. Every "not grey belt" outcome here is driven solely by footnote 7.

B2.3 Effingham

Source: [Appendix B, EF, Effingham](#). Seven areas, all classed "Effingham (Village)". All Purpose B assessments reference the Guildford to Bookham/Fetcham gap.

Ref	Purpose A	Purpose B	Purpose D	Footnote 7 headline constraint	Overall grey belt conclusion
EF-001	No Contribution	Weak, small part	No Contribution	Heritage designations, 1 to 95 per cent coverage, possibility of mitigation	Provisionally grey belt
EF-002	No Contribution	Moderate: "relatively small part" of the gap, natural and topographic features preserve separation	No Contribution	Irreplaceable habitat, Local Green Space and heritage designations, all 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
EF-003	No Contribution	Weak, small part	No Contribution	None found	Grey belt
EF-004	No Contribution	Weak, small part	No Contribution	Heritage designations over 95 per cent, little or no mitigation	Not grey belt
EF-005	No Contribution	Weak, small part	No Contribution	Heritage designations over 95 per cent, little or no mitigation	Not grey belt
EF-006	No Contribution	Weak, small part	No Contribution	Heritage designations over 95 per cent, little or no mitigation	Not grey belt
EF-007	No Contribution	Weak, small part	No Contribution	None found	Grey belt

Effingham tally: 2 grey belt, 2 provisionally grey belt, 3 not grey belt. EF-002 reaches Moderate on Purpose B, yet is still provisionally grey belt because of footnote 7 constraints.

B2.4 Ockham

Source: [Appendix B, OC, Ockham](#). Three areas, all classed "Ockham (Village)".

All three Ockham areas are assessed against a three town strategic gap, "the gap between Guildford, Woking and Cobham/Oxshott", rather than a two town gap.

Ref	Purpose A	Purpose B, with gap referenced	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
OC-001	No Contribution, not adjacent or near a Large Built Up Area	Weak: "relatively small part" of the gap between Guildford, Woking and Cobham/Oxshott, unlikely to cause loss of visual separation owing to natural landscape features, topography and presence of structures preventing intervisibility	No Contribution, not a historic town	Historic environment: "presence of some statutory heritage designations (between 1% and 95% coverage)", possibility of mitigation	Provisionally grey belt

Ref	Purpose A	Purpose B, with gap referenced	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
OC-002	No Contribution	Weak: "relatively small part" of the same three town gap, same reasoning as OC-001	No Contribution	Local Green Space over 1 per cent coverage and historic environment 1 to 95 per cent, both possibility of mitigation	Provisionally grey belt
OC-003	No Contribution	Moderate: "relatively substantial part" of the same three town gap, unlikely to cause loss of visual separation owing to natural landscape features and topography	No Contribution	Irreplaceable habitat 1 to 95 per cent and historic environment 1 to 95 per cent, both possibility of mitigation	Provisionally grey belt

Ockham tally: 0 grey belt, 3 provisionally grey belt, 0 not grey belt. OC-003 is one of five areas in the eight parishes to score above Weak on a grey belt purpose.

B2.5 East Clandon

Source: [Appendix B, EC, East Clandon](#). Seven areas, all classed "East Clandon (Village)". All Purpose B assessments reference the Guildford to Bookham/Fetcham gap.

Ref	Purpose A	Purpose B, with gap referenced	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
EC-001	No Contribution	Weak, small part, Guildford to Bookham/Fetcham	No Contribution	Irreplaceable habitat, ancient trees, possibility of mitigation, plus historic environment "extensive or total presence... (over 95% coverage)", little or no possibility of mitigation	Not grey belt
EC-002	No Contribution	Weak, relatively small part	No Contribution	Irreplaceable habitat 1 to 95 per cent, possibility of mitigation, plus historic environment over 95 per cent, little or no mitigation	Not grey belt
EC-003	No Contribution	Weak, small part	No Contribution	No footnote 7 constraints found	Grey belt
EC-004	No Contribution	Weak, small part	No Contribution	No footnote 7 constraints found	Grey belt
EC-005	No Contribution	Weak, small part	No Contribution	Irreplaceable habitat 1 to 95 per cent and historic environment 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
EC-006	No Contribution	Weak, relatively small part	No Contribution	Irreplaceable habitat 1 to 95 per cent and historic environment 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
EC-007	No Contribution	Weak, small part, natural landscape features, topography and presence of structures	No Contribution	Irreplaceable habitat, ancient trees, possibility of mitigation, plus historic environment over 95 per cent, little or no mitigation	Not grey belt

East Clandon tally: 2 grey belt (EC-003, EC-004), 2 provisionally grey belt (EC-005, EC-006), 3 not grey belt (EC-001, EC-002, EC-007). All three exclusions are driven by historic environment coverage above 95 per cent, in each case combined with a habitat finding that on its own would only have triggered a possibility of mitigation.

B2.6 West Clandon

Source: [Appendix B, WC, West Clandon](#). Twelve areas, all classed "West Clandon (Village)". All Purpose B assessments reference the Guildford to Bookham/Fetcham gap.

Ref	Purpose A	Purpose B, with gap referenced	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
WC-001	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	No footnote 7 constraints found	Grey belt
WC-002	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	No footnote 7 constraints found	Grey belt
WC-003	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	Irreplaceable habitat 1 to 95 per cent and historic environment 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
WC-004	No Contribution	Weak, small part, natural landscape and topography prevent intervisibility	No Contribution	No footnote 7 constraints found	Grey belt
WC-005	No Contribution	Weak, small part, natural landscape and topography prevent intervisibility	No Contribution	No footnote 7 constraints found	Grey belt
WC-006	No Contribution	Weak, small part, natural landscape and topography prevent intervisibility	No Contribution	No footnote 7 constraints found	Grey belt
WC-007	No Contribution	Weak, very small part, structures also prevent intervisibility	No Contribution	Historic environment "extensive or total presence... (over 95% coverage)", little or no mitigation	Not grey belt
WC-008	No Contribution	Weak, very small part, structures also prevent intervisibility	No Contribution	Local Green Space over 1 per cent coverage, possibility of mitigation, plus historic environment over 95 per cent, little or no mitigation	Not grey belt
WC-009	No Contribution	Weak, small part, natural landscape and topography prevent intervisibility	No Contribution	Historic environment over 95 per cent, little or no mitigation	Not grey belt
WC-010	No Contribution	Weak, small part, natural landscape and topography prevent intervisibility	No Contribution	No footnote 7 constraints found	Grey belt
WC-011	No Contribution	Weak, small part, natural landscape and topography prevent intervisibility	No Contribution	Irreplaceable habitat, ancient trees, and listed buildings, possibility of mitigation	Provisionally grey belt

Ref	Purpose A	Purpose B, with gap referenced	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
WC-012	No Contribution	Weak, small part, natural landscape and topography prevent intervisibility	No Contribution	No footnote 7 constraints found	Grey belt

West Clandon tally: 7 grey belt (WC-001, WC-002, WC-004, WC-005, WC-006, WC-010, WC-012), 2 provisionally grey belt (WC-003, WC-011), 3 not grey belt (WC-007, WC-008, WC-009). All three exclusions are driven solely by a historic environment finding of extensive or total presence.

B2.7 Ripley

Source: [Appendix B, RI, Ripley](#). Twelve areas, all classed "Ripley (Village)". All Purpose B assessments reference the Woking to Cobham/Oxshott gap. Every area scores "No Contribution" on Purpose D.

Ref	Purpose A	Purpose B, gap: Woking to Cobham/Oxshott	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
RI-001	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	Ancient trees and listed buildings, possibility of mitigation	Provisionally grey belt
RI-002	No Contribution	Weak, small part	No Contribution	Historic environment "extensive or total presence (over 95% coverage)", little or no mitigation	Not grey belt
RI-003	No Contribution	Weak, very small part, structures also prevent intervisibility	No Contribution	Historic environment over 95 per cent, little or no mitigation	Not grey belt
RI-004	No Contribution	Weak, very small part, structures also prevent intervisibility	No Contribution	Historic environment over 95 per cent, little or no mitigation	Not grey belt
RI-005	No Contribution	Weak, small part	No Contribution	None found	Grey belt
RI-006	No Contribution	Weak, very small part, structures also prevent intervisibility	No Contribution	Historic environment over 95 per cent, little or no mitigation	Not grey belt
RI-007	No Contribution	Weak, very small part, structures also prevent intervisibility	No Contribution	Flood risk 50 to 95 per cent, "extensive coverage across area", and historic environment over 95 per cent, little or no mitigation	Not grey belt
RI-008	No Contribution	Weak, small part	No Contribution	Irreplaceable habitat 1 to 95 per cent, "extensive coverage across area", little or no mitigation	Not grey belt
RI-009	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	Local Green Space over 1 per cent and heritage designations 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
RI-010	No Contribution	Weak, small part	No Contribution	None found	Grey belt

Ref	Purpose A	Purpose B, gap: Woking to Cobham/Oxshott	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
RI-011	No Contribution	Weak, very small part, structures also prevent intervisibility	No Contribution	Flood risk 50 to 95 per cent with possibility of mitigation, ancient trees with possibility of mitigation, and historic environment over 95 per cent, little or no mitigation overall	Not grey belt
RI-012	No Contribution	Weak, small part	No Contribution	None found	Grey belt

Ripley tally: 3 grey belt (RI-005, RI-010, RI-012), 2 provisionally grey belt (RI-001, RI-009), 7 not grey belt. All twelve areas score only "Weak" on the maximum contribution to grey belt purposes. Ripley has the highest proportion of exclusions of the eight parishes, 7 of 12, driven overwhelmingly by the historic environment constraint, since five of the seven exclusions cite extensive or total presence of statutory heritage designations, consistent with Ripley's historic High Street and conservation area core.

B2.8 Send

Source: [Appendix B, SE, Send](#). Sixteen areas, all classed "Send (Village)". All Purpose B assessments reference the Woking to Guildford gap.

Ref	Purpose A	Purpose B, gap: Woking to Guildford	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
SE-001	No Contribution	Weak, small part	Weak: forms part of the setting of the historic town of Woking but makes no special character contribution, contains part of the Wey and Godalming Navigations Conservation Area	Flood risk "extensive or total presence (over 95% coverage)", little or no mitigation	Not grey belt
SE-002	No Contribution	Weak, small part	No Contribution	Heritage designations 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
SE-003	No Contribution	Weak, small part	No Contribution	None found	Grey belt
SE-004	No Contribution	Weak, small part	No Contribution	None found	Grey belt
SE-005	No Contribution	Weak, very small part	No Contribution	None found	Grey belt
SE-006	No Contribution	Weak, small part	No Contribution	None found	Grey belt
SE-007	No Contribution	Weak, small part	No Contribution	None found	Grey belt

Ref	Purpose A	Purpose B, gap: Woking to Guildford	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
SE-008	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	Listed buildings present, possibility of mitigation	Provisionally grey belt
SE-009	No Contribution	Weak, small part	No Contribution	None found	Grey belt
SE-010	No Contribution	Weak, small part	No Contribution	Ancient trees and listed buildings, possibility of mitigation	Provisionally grey belt
SE-011	No Contribution	Weak, small part, structures also prevent intervisibility	No Contribution	None found	Grey belt
SE-012	No Contribution	Moderate: relatively small part of the gap	No Contribution	None found	Grey belt
SE-013	No Contribution	Moderate: relatively small part of the gap	No Contribution	Listed buildings present, possibility of mitigation	Provisionally grey belt
SE-014	No Contribution	Weak, small part	No Contribution	Local Green Space "extensive or total presence (over 95% coverage)", little or no mitigation	Not grey belt
SE-015	No Contribution	Moderate: relatively substantial part of the gap	No Contribution	Heritage designations 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
SE-016	Strong: adjacent to the Large Built Up Area of Woking, restricted and contained by the River Wey and existing development, would create an incongruous "finger" of development	Weak, relatively small part, structures also prevent intervisibility	Strong: adjacent to the historic town of Woking, Old Woking, positive visual and experiential relationship, adjacent to Old Woking Conservation Area	Flood risk 50 to 95 per cent and heritage designations 1 to 95 per cent, possibility of mitigation	Not grey belt

Send tally: 8 grey belt (SE-003, SE-004, SE-005, SE-006, SE-007, SE-009, SE-011, SE-012), 5 provisionally grey belt (SE-002, SE-008, SE-010, SE-013, SE-015), 3 not grey belt (SE-001, SE-014, SE-016). Send is the only parish of the eight containing an area that scores Strong on a grey belt purpose.

B2.9 Send Marsh and Burnt Common

Source: [Appendix B, SM, Send Marsh and Burntcommon](#). Seventeen areas, all classed "Send Marsh / Burntcommon (Village)". Send Marsh and Burnt Common fall within Send parish administratively, but Appendix B treats them as a distinct settlement with their own reference series. Purpose B is assessed against two different gaps depending on location, Woking to Bookham/Fetcham for SM-001 to SM-004 and SM-013 to SM-017, and Guildford to Cobham/Oxshott for SM-005 to SM-012.

Ref	Purpose A	Purpose B, with gap referenced	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
SM-001	No Contribution	Weak, small part, Woking to Bookham/Fetcham	No Contribution	Flood risk 50 to 95 per cent, biodiversity 1 to 95 per cent, and ancient trees, all possibility of mitigation	Provisionally grey belt
SM-002	No Contribution	Weak, small part, structures also prevent intervisibility, Woking to Bookham/Fetcham	No Contribution	None found	Grey belt
SM-003	No Contribution	Weak, small part, structures also prevent intervisibility, Woking to Bookham/Fetcham	No Contribution	None found	Grey belt
SM-004	No Contribution	Weak, small part, structures also prevent intervisibility, Woking to Bookham/Fetcham	No Contribution	None found	Grey belt
SM-005	No Contribution	Weak, small part, structures also prevent intervisibility, Guildford to Cobham/Oxshott	No Contribution	None found	Grey belt
SM-006	No Contribution	Weak, small part, structures also prevent intervisibility, Guildford to Cobham/Oxshott	No Contribution	None found	Grey belt
SM-007	No Contribution	Weak, small part, Guildford to Cobham/Oxshott	No Contribution	Irreplaceable habitat 1 to 95 per cent, "extensive coverage across area", little or no mitigation	Not grey belt
SM-008	No Contribution	Weak, small part, structures also prevent intervisibility, Guildford to Cobham/Oxshott	No Contribution	Ancient trees and listed buildings, possibility of mitigation	Provisionally grey belt
SM-009	No Contribution	Weak, small part, structures also prevent intervisibility, Guildford to Cobham/Oxshott	No Contribution	Irreplaceable habitat 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
SM-010	No Contribution	Weak, small part, structures also prevent intervisibility, Guildford to Cobham/Oxshott	No Contribution	None found	Grey belt
SM-011	No Contribution	Weak, small part, structures also prevent intervisibility, Guildford to Cobham/Oxshott	No Contribution	Listed buildings present, possibility of mitigation	Provisionally grey belt
SM-012	No Contribution	Weak, small part, structures also prevent intervisibility, Guildford to Cobham/Oxshott	No Contribution	Ancient trees and listed buildings, possibility of mitigation	Provisionally grey belt
SM-013	No Contribution	Weak, small part, Woking to Bookham/Fetcham	No Contribution	None found	Grey belt
SM-014	No Contribution	Weak, small part, structures also prevent intervisibility, Woking to Bookham/Fetcham	No Contribution	Heritage designations 1 to 95 per cent, possibility of mitigation	Provisionally grey belt
SM-015	No Contribution	Weak, small part, Woking to Bookham/Fetcham	No Contribution	Listed buildings present, possibility of mitigation	Provisionally grey belt
SM-016	No Contribution	Weak, small part, Woking to Bookham/Fetcham	No Contribution	None found	Grey belt

Ref	Purpose A	Purpose B, with gap referenced	Purpose D	Footnote 7 headline constraints	Overall grey belt conclusion
SM-017	No Contribution	Weak, very small part, Woking to Bookham/Fetcham	No Contribution	Local Green Space "extensive or total presence (over 95% coverage)", little or no mitigation	Not grey belt

Send Marsh and Burnt Common tally: 8 grey belt (SM-002, SM-003, SM-004, SM-005, SM-006, SM-010, SM-013, SM-016), 7 provisionally grey belt (SM-001, SM-008, SM-009, SM-011, SM-012, SM-014, SM-015), 2 not grey belt (SM-007, SM-017). All seventeen areas score only "Weak" on the maximum contribution to grey belt purposes.

B3. Verbatim reasoning behind the grey belt conclusions

B3.1 The standard template

Across all eight parishes, the great majority of proformas use the same reasoning template, varying only in the gap referenced, the size qualifier and the footnote 7 constraint. A representative example, from EH-007, is:

"Purpose A. No Contribution: This AA makes no notable contribution to purpose A because it is not adjacent or near to a large built up area. Purpose B. Weak Contribution: The AA comprises a small part of the gap between Guildford and Bookham/Fetcham. Development of the AA would be unlikely to result in the loss of visual separation. The AA makes a weak contribution towards the prevention of neighbouring towns merging into one another, owing to natural landscape features and topography. Purpose D. No Contribution: This AA is not adjacent to or within the setting of a historic town and as such makes no notable contribution to purpose D. Footnote 7 conclusion. No strong reason for refusing or restricting development."

The same template, with the gap name substituted, appears in West Horsley (WH-004), Effingham (EF-003 and EF-007), East Clandon (EC-003 and EC-004), West Clandon (WC-004 and the other six grey belt areas), Ripley (RI-005, RI-010, RI-012), Send (SE-003 and the other seven grey belt areas) and Send Marsh and Burnt Common (SM-002 and the other seven grey belt areas). Ockham uses the same wording other than referring to the gap "between Guildford, Woking and Cobham/Oxshott".

Provisionally grey belt areas use exactly the same purpose reasoning. They differ only in the footnote 7 line, which reads "Potentially provides a strong reason for refusing or restricting development with possibility of mitigation", followed by the constraint concerned.

B3.2 The exceptions worth reading in full

EH-021, East Horsley, on the National Landscape overlap being treated as mitigable:

"Potentially provides a strong reason for refusing or restricting development with possibility of mitigation: Overlaps with the Surrey Hills National Landscape"

together with "Presence of some (between 1% and 95% coverage) protected sites or exclusion zones" for biodiversity and "Presence of some irreplaceable habitats (between 1% and 95% coverage)".

EH-001, East Horsley, the only cumulative escalation in the eight parishes:

"Potentially provides a strong reason for refusing or restricting development with little or no possibility of mitigation (combination and spread of multiple Footnote 7 constraints)"

Each individual constraint on EH-001 was recorded only as "presence of some".

EF-002, Effingham, one of five Moderate scores:

"Moderate Contribution: The AA comprises a relatively small part of the gap between Guildford and Bookham/Fetcham. Development of the AA would be unlikely to result in the loss of visual separation. The AA makes a moderate contribution towards the prevention of neighbouring towns merging into one another, owing to natural landscape features and topography."

OC-003, Ockham, the largest gap share qualifier used in the Horsley, Effingham, Ockham and Clandon group:

"Moderate Contribution: The AA comprises a relatively substantial part of the gap between Guildford, Woking and Cobham/Oxshott. Development of the AA would be unlikely to result in the loss of visual separation. The AA makes a moderate contribution towards the prevention of neighbouring towns merging into one another, owing to natural landscape features and topography."

SE-016, Send, the only Strong score in all 115 areas, on Purpose A:

"This AA is adjacent to the large built up area of Woking with physical connections on its northern boundary. The AA contains a small amount of potentially inappropriate existing low density development in its east and south and is partially enclosed by existing development to the south east. The River Wey and its tributaries and existing development to the north, east, south and west would restrict and contain development and prevent sprawl in all directions. Development of the AA would result in an incongruous pattern of development due to the 'finger' of development extending south from Woking."

and on Purpose D:

"The AA is adjacent to the historic town of Woking (Old Woking) and contributes to its setting. Whilst the AA contains some development of mixed character and is linear in its nature. Its northern extent, adjacent to Old Woking, offers a positive visual and experiential relationship of considerable importance to historic aspects of the town. The AA is adjacent to and of significant visual importance to the historic assets of Old Woking Conservation Area."

SE-001, Send, the only exclusion in the eight parishes driven by flood risk alone:

"Potentially provides a strong reason for refusing or restricting development with little or no possibility of mitigation.: Extensive or total presence of high or medium flood risk from any sources now or in the future (over 95% coverage)."

B4. Where the reasoning looks vulnerable

The points below are evidence based observations drawn directly from the proforma text and the stated methodology. They are not speculation about planning outcomes.

B4.1 Purpose B reasoning is templated across nearly every area

Across all 115 areas, the Purpose B narrative follows an almost word for word template: "[Weak or Moderate] Contribution: The AA comprises a [qualifier] part of the gap between [Town X] and [Town Y]. Development of the AA would be unlikely to result in the loss of visual separation... owing to natural landscape features and topography [preventing intervisibility]." The only variables that change between dozens of areas are the size qualifier and whether "presence of structures" is added. Not one proforma across the eight parishes names a single ridge, woodland block, hedgerow or building group as the feature preserving separation. This leaves a parish councillor very little to test the claim against, because the underlying GIS and viewshed analysis is not published in Appendix B.

B4.2 The size of gap judgement cannot be checked from the proforma

Main Report para 2.5.18 sets quantified bands for substantial, relatively substantial, relatively small and small shares of a gap, but describes them as "a very general guide" reviewed "on a case-by-case basis". The proformas assert, for example, that WH-001 is a "small part" of the Guildford to Bookham/Fetcham gap while WH-004 is only a "very small part", without giving any percentage or area figure. Because the underlying calculation is not published, a councillor cannot verify whether these distinctions are measured differences or judgement calls that happen to produce a Weak rather than Moderate score in almost every

case.

B4.3 Almost no area scores above Weak, which is worth testing against AECOM's own Moderate criteria

The Moderate threshold for Purpose B is "located in a gap between towns, but include one or more features that weaken their contribution... forming a small part of the gap between towns [or] being able to be developed without the loss of visual separation" (Table 2-6). Because the Weak conclusion is reached via "unlikely to result in loss of visual separation", which is itself a Moderate type feature, combined with "small part of the gap", most of these areas sit close to the Weak and Moderate boundary as AECOM defines it. Yet 109 of 115 land in Weak, five in Moderate and one in Strong. Given how many areas receive materially identical reasoning, the near uniform Weak conclusion reads as a default outcome rather than a parcel by parcel judgement, and that is a reasonable internal consistency question to put to the Council.

B4.4 Coalescence is understated because our settlements are villages and the gaps modelled are borough scale

Purpose B is only tested against the nine strategic gaps listed at para 2.5.19, all involving Guildford, Woking, Ash and Tongham, Bookham/Fetcham, Cobham/Oxshott or Godalming. The proformas therefore never test whether development of an area would cause the village itself to coalesce with a neighbouring village. The PPG excludes villages from Purpose B (para 2.5.17: "the PPG is explicit in its clarification that this purpose relates to the merging of towns, not villages"), so this is a methodology level choice rather than a proforma level error. The effect is nonetheless that the proformas cannot, on their own terms, ever record village to village coalescence risk anywhere in the eight parishes.

B4.5 Heritage screening uses a coverage percentage test that can under weight setting based harm

The footnote 7 historic environment bands are set purely by the percentage of the area covered by a statutory heritage designation (Table 2-8: "presence of some" at 1 to 95 per cent, "extensive or total" above 95 per cent) rather than by the significance of the asset or the sensitivity of its setting. Many areas across the eight parishes, including WH-001, WH-005, WH-006, WH-028, EH-016, EH-018, EH-029, EF-001, EF-002, OC-001, OC-002, EC-005, EC-006, WC-003, WC-011, RI-001, RI-009, SE-002, SE-008, SE-010, SE-013, SE-015, SM-008, SM-011, SM-012, SM-014 and SM-015, are recorded as containing heritage designations and scored only with possibility of mitigation, purely because the designation covers less than 95 per cent of the area. This is a mechanical coverage threshold, not an assessment of whether development would harm the setting of a listed building or conservation area, which is the actual statutory test under the Planning (Listed Buildings and Conservation Areas) Act 1990. The same logic operates in reverse for Ripley, where five exclusions rest on the coverage test being crossed rather than on any setting analysis. FAQs Q14 concedes the point: "it is only once the scale, form and design of the proposed development is known that one could reach a conclusion on whether the heritage designation provides a strong reason for refusal."

B4.6 Cumulative footnote 7 effects are assessed in only one case out of 115

Main Report para 2.6.6 states that footnote 7 constraints "were also considered in sum, to address whether a combination of different constraints might result in the potential for refusing or restricting development." In practice, of the 115 areas across the eight parishes, only EH-001 is recorded with an explicit combination finding, and there each individual constraint was only "presence of some". No other area with two or three concurrent constraints was escalated in the same way. SM-001 in Send Marsh carries three separate constraints run concurrently, flood risk at 50 to 95 per cent, biodiversity at 1 to 95 per cent and ancient trees, and was not escalated. Nor were EF-002 with three constraints, WH-006 with ancient trees and listed buildings, or EH-003, EH-006 and EH-011 with dual habitat and Local Green Space

findings. It is not clear from the proformas what threshold of "combination and spread" triggers the escalation used for EH-001 but not for areas with a similar or greater number of concurrent constraints.

B4.7 The Purpose C headline is liable to be misread

Every proforma displays a "Purposes A, B, C and D conclusion" line separately from the "Maximum contribution to grey belt purposes (A, B and D)" line. In the great majority of areas across all eight parishes the first line reads "Strong Contribution", driven entirely by Purpose C, which the Main Report confirms is not one of the three grey belt purposes and is retained from the 2013 Pegasus study rather than assessed under the current PPG (paras 2.5.20 to 2.5.24). A reader working only from the first line could easily and wrongly conclude that these areas strongly contribute to Green Belt purposes and are therefore well protected, when in grey belt terms almost every one of them is only Weak. This affects areas in all three final categories, not only the grey belt ones, which reinforces that the headline line carries no grey belt relevant information on its own.

B4.8 Boundaries appear to be mapping derived rather than tied to described features

The Main Report states that area boundaries are meant to follow "readily recognisable features (such as roads, watercourses, etc.)" and, ideally, defensible and likely to be permanent boundaries (paras 2.2.1 to 2.2.4, FAQs Q7). None of the 115 proformas contains any text identifying which specific road, hedge or watercourse forms the boundary. The only boundary evidence supplied is the red outline on the accompanying map. A councillor wanting to verify that a boundary sits on a hedgerow or lane rather than an arbitrary line would have to interpret the map image directly.

B4.9 Reasoning is thinnest in the grey belt areas with no constraints

For the 45 areas concluded grey belt outright, the footnote 7 conclusion is simply "No strong reason for refusing or restricting development", with no supporting narrative beyond the individual constraint ticks. There is no positive description of what is actually on these parcels, whether agricultural use, paddocks or gardens, beyond the Purpose A and B boilerplate. This is consistent with a desk based GIS and aerial exercise, and it is the thinnest reasoning category in the dataset.

B4.10 The strategic gap assigned varies in ways the proformas do not explain

The eight parishes are assessed against five different gap pairings. West Horsley, Effingham, both Clandons and most of East Horsley use Guildford to Bookham/Fetcham. Parts of East Horsley use Woking to Bookham/Fetcham. Ockham uses a three town gap of Guildford, Woking and Cobham/Oxshott. Ripley uses Woking to Cobham/Oxshott. Send uses Woking to Guildford. Send Marsh and Burnt Common are split internally between Woking to Bookham/Fetcham and Guildford to Cobham/Oxshott. Since the size of an area's share of its gap is the single variable that determines the Purpose B score, and the gap chosen determines the denominator of that share, the basis on which each gap was assigned is material and is not explained in the proformas.

B4.11 Flood risk is treated inconsistently with the report's own deliverability observation

Flood risk appears above the baseline band in six areas across the eight parishes, EH-032, RI-007, RI-011, SE-001, SE-016 and SM-001. SE-001 is excluded on flood risk alone. Yet the Main Report itself observes at para 2.3.17 that Green Belt land in this part of the Wey valley is "in any case highly unlikely to be brought forward for development due to flood risk from the River Wey", which suggests a deliverability judgement is being made in the narrative that is not applied consistently through the scoring.

B4.12 The Surrey Hills overlap did not automatically exclude land

EH-021 in East Horsley overlaps the Surrey Hills National Landscape and is still concluded provisionally grey belt, with the overlap treated as capable of mitigation. EH-022 was excluded, but only in combination

with biodiversity and habitat findings above 95 per cent coverage. No area in the other seven parishes records any National Landscape overlap above the 1 per cent baseline. Any assumption that a landscape designation guarantees exclusion is not supported by the evidence base.

B5. Evidence on site visits

Finding: the documents do not evidence that any specific site visit was carried out for any of the 115 assessment areas in the eight parishes.

A direct text search of all nine parish PDFs for the terms below returned zero matches in every document:

Search term	WH	EH	EF	OC	EC	WC	RI	SE	SM
"site visit"	0	0	0	0	0	0	0	0	0
"visited"	0	0	0	0	0	0	0	0	0
"field survey"	0	0	0	0	0	0	0	0	0
"ground truth"	0	0	0	0	0	0	0	0	0

Supporting observations:

- The Main Report confirms site visits happened somewhere in the borough in January 2026, but only "where necessary" and only for specific trigger reasons (paras 2.5.8 and 2.5.9).
- No area level record of which assessment areas received a site visit is published in the Main Report, the FAQs, or any Appendix B document. There is no visit date, visit log or field note reference anywhere in the text extracted from the nine parish documents.
- Because Purpose D does not apply at all to seven of the eight parishes, the specific trigger of "views into and out of historic cores... for purpose D" could not have applied to any area outside Send.
- The templated Purpose B narrative across all 115 proformas is more consistent with a desk based GIS and aerial imagery exercise than with bespoke field observation, though the documents do not allow this to be confirmed or ruled out either way.

Conclusion for councillor purposes. This is not an allegation that AECOM departed from its own method, because visits were discretionary and undertaken where necessary at professional discretion. It does mean the Council cannot presently point to any published evidence that any specific field in any of the eight parishes was visited. That is a precise, answerable question rather than a general complaint, and it is question 1 in section 5.

B6. Summary counts

Parish	Areas reviewed	Grey belt	Provisionally grey belt	Not grey belt
West Horsley	9, WH-001 and WH-003 to WH-009 plus WH-028	1	7	1
East Horsley	32, EH-001 to EH-032	14	12	6
Effingham	7, EF-001 to EF-007	2	2	3
Ockham	3, OC-001 to OC-003	0	3	0
East Clandon	7, EC-001 to EC-007	2	2	3
West Clandon	12, WC-001 to WC-012	7	2	3
Ripley	12, RI-001 to RI-012	3	2	7
Send village	16, SE-001 to SE-016	8	5	3

Parish	Areas reviewed	Grey belt	Provisionally grey belt	Not grey belt
Send Marsh and Burnt Common	17, SM-001 to SM-017	8	7	2
Total	115	45	42	28

For borough wide context, the Main Report states that 575 areas were assessed in total, with 120 grey belt, 307 provisionally grey belt and 148 not grey belt (Table 3-3, paras 3.1.2 to 3.1.4). The eight parishes therefore account for 20 per cent of all assessed areas, 37 per cent of all grey belt, 14 per cent of all provisionally grey belt and 19 per cent of all not grey belt outcomes across the borough.

Of the 115 areas, 109 reach no higher than Weak against the grey belt purposes. Five reach Moderate, namely EF-002, OC-003, SE-012, SE-013 and SE-015. One reaches Strong, SE-016, which scores Strong on both Purpose A and Purpose D. Twenty seven of the 28 exclusions are therefore produced by footnote 7 constraints rather than by the land performing well against the Green Belt purposes.

B7. Sources and verification

All findings in this document derive from the following published documents. Working copies of every PDF, together with the extracted text used for the searches reported at B5, are retained for independent verification.

Document	Pages and areas	URL
Green Belt Assessment 2026 landing page and interactive map	not applicable	https://www.guildford.gov.uk/localplan/greenbeltassessment
Green Belt Assessment Report, main report	37pp	https://www.guildford.gov.uk/media/37855/Green-Belt-Assessment-Report/pdf/Guildford_GBA_Main_Report.pdf?m=1785142668967
Green Belt Assessment FAQs	5pp	https://www.guildford.gov.uk/media/37901/Guildford-Green-Belt-Assessment-FAQs/pdf/4._Guildford_Green_Belt_Assessment_FA_Qs.pdf?m=1785240729130
Appendix B, WH, West Horsley	18pp, 9 areas	https://www.guildford.gov.uk/media/37895/Guildford-GBA-Appendix-B-WH-West-Horsley/pdf/Guildford_GBA_Appendix_B_-_WH_-_West_Horsley.pdf?m=1785144270677
Appendix B, EH, East Horsley	64pp, 32 areas	https://www.guildford.gov.uk/media/37867/Guildford-GBA-Appendix-B-EH-East-Horsley/pdf/Guildford_GBA_Appendix_B_-_EH_-_East_Horsley.pdf?m=1785143541360
Appendix B, EF, Effingham	14pp, 7 areas	https://www.guildford.gov.uk/media/37866/Guildford-GBA-Appendix-B-EF-Effingham/pdf/Guildford_GBA_Appendix_B_-_EF_-_Effingham.pdf?m=1785143541160
Appendix B, OC, Ockham	6pp, 3 areas	https://www.guildford.gov.uk/media/37880/Guildford-GBA-Appendix-B-OC-Ockham/pdf/Guildford_GBA_Appendix_B_-_OC_-_Ockham.pdf?m=1785143663787
Appendix B, EC, East Clandon	14pp, 7 areas	https://www.guildford.gov.uk/media/37865/Guildford-GBA-Appendix-B-EC-East-Clandon/pdf/Guildford_GBA_Appendix_B_-_EC_-_East_Clandon.pdf?m=1785143482110
Appendix B, WC, West Clandon	24pp, 12 areas	https://www.guildford.gov.uk/media/37894/Guildford-GBA-Appendix-B-WC-West-Clandon/pdf/Guildford_GBA_Appendix_B_-_WC_-_West_Clandon.pdf?m=1785144270390
Appendix B, RI, Ripley	24pp, 12 areas	https://www.guildford.gov.uk/media/37885/Guildford-GBA-Appendix-B-RI-Ripley/pdf/Guildford_GBA_Appendix_B_-_RI_-_Ripley.pdf?m=1785144200057

Document	Pages and areas	URL
Appendix B, SE, Send	32pp, 16 areas	https://www.guildford.gov.uk/media/37887/Guildford-GBA-Appendix-B-SE-Send/pdf/Guildford_GBA_Appendix_B_-_SE_-_Send.pdf?m=1785144200583
Appendix B, SM, Send Marsh and Burntcommon	34pp, 17 areas	https://www.guildford.gov.uk/media/37890/Guildford-GBA-Appendix-B-SM-Send-Marsh-Burntcommon/pdf/Guildford_GBA_Appendix_B_-_SM_-_Send_Marsh__Burntcommon.pdf?m=1785144242203
BBC News, "'Grey belt' areas assessed for building by Surrey council", 29 July 2026	not applicable	https://www.bbc.co.uk/news/articles/c1w135747weo
Get Surrey, Effingham 37 home refusal on grey belt grounds, 29 July 2026	not applicable	https://www.getsurrey.co.uk/news/surrey-news/surrey-villages-37-home-development-34371330

Area references used throughout, for example WH-004, EH-021, OC-003, RI-007 and SE-016, correspond exactly to the "Reference" field at the top of each Appendix B proforma, and can be located either by searching the relevant PDF for that code or via Appendix E and the Council's interactive assessment area map.

Prepared by West Horsley Parish Council, 30 July 2026, and circulated for information to East Horsley, Effingham, West Clandon, East Clandon, Ockham, Ripley and Send Parish Councils. No response is sought.