

Guildford Green Belt Assessment

Final Report

Guildford Borough Council

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Quality information

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Table 1-1 Acronyms

Acronym

AA	Assessment Area
GBA	Green Belt Assessment
GBC	Guildford Borough Council
LBUA	Large Built Up Area
LGS	Local Green Space
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PDL	Previously Developed Land
PPG	Planning Practice Guidance
RAMSAR	Convention on Wetlands of International Importance
SAC	Special Areas of Conservation
SCI	Sites of Community Importance
SPA	Special Protection Area

1. Introduction

1.1 Project overview & scope

- 1.1.1 AECOM is commissioned by Guildford Borough Council (GBC) to produce a Green Belt Assessment (GBA) using the latest Planning Practice Guidance (PPG). The study evaluates the existing Green Belt across the study area and as required by the National Planning Policy Framework (NPPF), seeks to identify grey belt.
- 1.1.2 The PPG on Green Belt (27 February 2025)¹ sets out the following key steps in a Green Belt Assessment:
- identify the location and appropriate scale of area/s to be assessed;
 - evaluate the contribution each assessment area makes to Green Belt purposes (a), (b), and (d), using the criteria identified;
 - consider whether applying the policies relating to the areas or assets of particular importance in footnote 7² to the NPPF (other than Green Belt) would potentially provide a strong reason for refusing or restricting development of the assessment area;
 - identify grey belt land;
 - identify if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan.
- 1.1.3 AECOM has applied the above guidance in order to assess the Green Belt in Guildford against the Green Belt purposes as set out in the NPPF. The study area encompasses the entirety of Guildford's designated Green Belt as demonstrated in Figure 1-1. The study area has been assessed against every one of the five Green Belt purposes as set out in the NPPF.

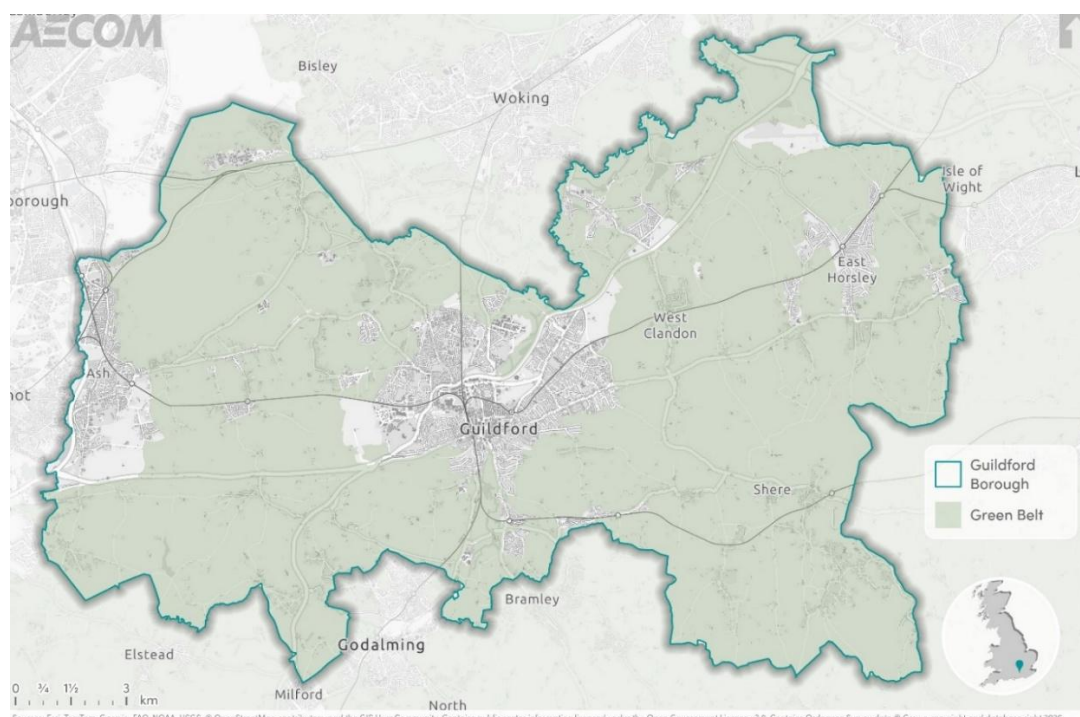


Figure 1-1 Map showing the Guildford authority and its Green Belt

¹ Available at: <https://www.gov.uk/guidance/green-belt>

² This report has been updated in August 2026, following the publication of the 2026 NPPF that removes footnote 7 from the grey belt definition and so the assessment process.

1.2 Report structure

- 1.2.1 This report is structured to best allow the reader to understand how the GBA has been undertaken and how the conclusions of the report have been made. After introducing local context and the national policy context, Chapter 2 of the report describes the methodology followed to assess the Green Belt in Guildford.
- 1.2.2 Chapter 3 of the report sets out the findings of the GBA in a series of tables and maps.
- 1.2.3 Finally, Chapter 4 of the report concludes the assessment and sets out suggested next steps and recommendations for Guildford Borough Council.

1.3 The Guildford Green Belt & local context

- 1.3.1 Guildford is the county town of Surrey, located in the south-west of the county. Guildford's adopted Local Plan makes reference to a need to protect its attractive and valued environment whilst balancing this with the need to accommodate development needs.
- 1.3.2 GBC is preparing a new Local Plan. The current Local Plan: Strategy and Sites (LPSS) document, adopted in 2019 and hereafter referred to as the 'adopted Local Plan', sought to meet objectively assessed housing needs in full (with its housing requirement set at 562 dwellings p/a³). This required a review and alteration of Green Belt boundaries. A number of villages and other major previously developed land (PDL) sites were also inset from the Green Belt (in accordance with the then NPPF paragraph 150). The NPPF defines PDL as land which has been lawfully developed and is or was occupied by a permanent structure and any fixed surface infrastructure associated with it. As such, the extent of Green Belt in the Borough was reduced from 89% to 84%. All decisions regarding site allocations and Green Belt boundaries were underpinned by a robust and comprehensive Green Belt and Countryside Study.
- 1.3.3 The 2024 NPPF and accompanying guidance introduced changes to the standard method. Under the new Standard Method, the local housing need figure for Guildford is significantly larger than the requirement in the adopted plan, at 1,168 dwellings p/a. The new NPPF expects housing need is met in full and, where authorities have demonstrated an exploration of all other reasonable options, a review of Green Belt boundaries can be considered under exceptional circumstances. As such, AECOM has undertaken this assessment in order to support the Council's review of Green Belt Boundaries and to support decision making throughout the development management process.

1.4 National policy context

- 1.4.1 This GBA is undertaken in line with the Green Belt PPG which sets out advice on the role of the Green Belt in the planning system. In particular, the PPG sets out *"the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, **where relevant to identifying grey belt.**"*
- 1.4.2 This report has been prepared under the August 2026 NPPF, which defines grey belt as:

"... land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2."
- 1.4.3 Policy GB4 of the 2026 NPPF states that "any alterations to Green Belt boundaries promote sustainable patterns of development, including by...giving priority to the release of previously developed land within the Green Belt, then to grey belt land which is not previously developed, and then other Green Belt locations, so long as this promotes a sustainable pattern of development overall". As such, there is a sequential approach to the release of Green Belt for development. However, **this is not a strict sequential approach, such that grey belt will not always be more appropriate for development than other land in the Green Belt given wider planning and sustainability factors.**
- 1.4.4 The PPG explains that *"where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration*

³ No provision for unmet need was included within this requirement

in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the National Planning Policy Framework”

- 1.4.5 The PPG also explains that “*where land is identified as grey belt land, any proposed development of that land should be considered against paragraph 155 of the NPPF [now policy GB7], which sets out the conditions in which development would not be inappropriate on grey belt land.*”
- 1.4.6 For the purpose of this report, the following definitions apply:
- **Assessment** of the Green Belt refers to the evaluation of the Green Belt against the purposes of the Green Belt set out in the NPPF and identifying grey belt. That is the focus of this report.
 - **Review** of the Green Belt boundary refers to the consideration of which area designated as Green Belt may be released (typically for development) in light of the findings of a GBA and wider factors. These decisions lie with the Council, Informed by this report.
- 1.4.7 In terms of reviewing the Green Belt, the PPG explains that “... *the review and alteration of Green Belt boundaries should take place, where necessary, as part of the plan making process. In doing so, we expect authorities to identify grey belt land to inform this review...*”. Therefore, this report will be used to inform decisions about which land that is currently in the Green Belt might be suitable for release from this designation.
- 1.4.8 It is important to emphasise that **identification as grey belt does not necessarily mean that the land is also suitable for development**. It means that land does not strongly meet the NPPF Green Belt purposes A, B and D.
- 1.4.9 Policy GB7 of the NPPF sets out the criteria for development in the Green Belt not to be regarded as inappropriate. Amongst others, these include being on grey belt land that would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan and being in a sustainable location. It is expected that a lot of grey belt may not meet these criteria.

2. Methodology

2.1 Overview

- 2.1.1 This section of the report sets out the methodology for and conventions adopted in assessing the Green Belt in Guildford against the NPPF purposes and in identifying grey belt.
- 2.1.2 The methodology section covers the approach to identifying areas for assessment, settlement classification and engagement with neighbouring authorities, purposes assessment and making grey belt conclusions. This section also sets out how any adopted allocations and committed development have been accounted for in the assessment to ensure as far as reasonably possible that any forthcoming development does not undermine the findings of this GBA.

2.2 Identifying assessment areas

- 2.2.1 Following the approach in the PPG, AECOM's approach involves defining small and sufficiently granular assessment areas (AAs) around settlements to allow for more nuanced differentiation between parcels in terms of grey belt potential.
- 2.2.2 AAs from the previous Green Belt and Countryside Study (2013) have been re-assessed in light of the updated approach and some, particularly around settlements, have been subdivided to achieve the required granularity for assessment.
- 2.2.3 Another consideration for setting AA boundaries is the presence of defensible/likely to be permanent boundaries. Where features might be in close proximity to one another, professional judgement has been made as to which boundary to use in order to ensure the AAs are functional and logical. Examples of the readily recognisable, defensible and/or likely to be permanent boundaries that have been considered in this study include but are not limited to:
 - Motorways, A and B roads
 - Railway lines
 - Rivers, canals and water courses
 - Existing development with strong boundaries
 - Well established woodland boundaries
 - Common land
- 2.2.4 Examples of readily recognisable but not necessarily likely to be permanent boundaries include;
 - Unclassified/minor public and private roads and footpaths
 - Streams and smaller water bodies
 - Hedgerows
 - Field/land ownership boundaries
- 2.2.5 Figure 2-1 shows the assessment areas identified for the purpose of this study, and Appendix E includes a labelled map of all assessment areas.

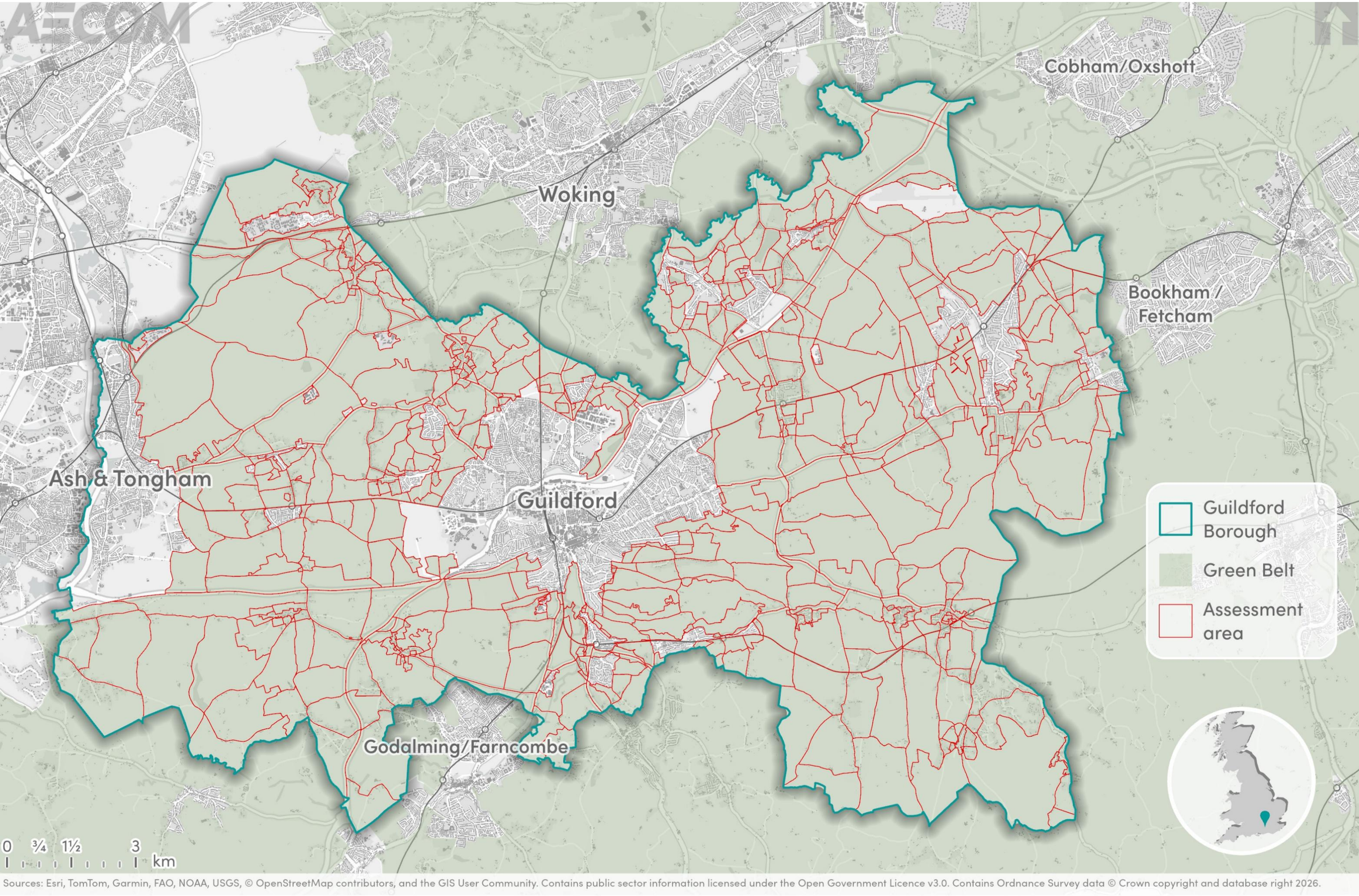


Figure 2-1 Map showing assessment areas identified for the purpose of this study.

2.3 Settlement classification

Overview

- 2.3.1 There are no fixed rules or guidance on how to approach settlement classification for Green Belt Assessment purposes, although it is an essential step to identify which Green Belt purposes will apply to AAs for assessment. The PPG makes clear that none of the purposes A, B and D should relate to settlements classified as villages. For the purposes of Green Belt Assessment, it is necessary to classify settlements as:
- Large Built up Areas (LBUA), to be assessed against Green Belt **purpose A**
 - Towns, to be assessed against Green Belt **purpose B**
 - Historic towns, to be assessed against Green Belt **purpose D**
- 2.3.2 As well as settlements within Guildford, it is necessary to classify settlements in neighbouring Local Planning Authorities where the development of Green Belt land in Guildford would directly impact on neighbouring authorities, such as when an extension of a town would about the authority boundary.
- 2.3.3 AECOM has used previous studies and existing work on settlement hierarchy, principally the Guildford Borough Settlement Hierarchy (see Appendix D), as a starting point and applied a set of criteria to reach sound conclusions on settlement classification. Key variables considered in this process include:
- Place in existing settlement hierarchy
 - Population
 - Function of settlement
 - Extent of local services
- 2.3.4 Although the existing settlement hierarchy takes precedence, AECOM has also noted ONS thresholds to inform the process. AECOM has used ONS-derived populations to undertake settlement classification for this study which may not always match administrative boundaries. Table 2-1 sets out the ONS thresholds as they relate to Green Belt Assessment.

Table 2-1 ONS built-up area size classification⁴

GBA Settlement Type	ONS Built Up Area Classification (and Approximate Settlement Type)	Population Range
Large Built Up Area (LBUA)⁵		75,000+
	Major (cities)	200,000+
	Large (large towns/smaller cities)	75,000-199,999
Town		5,000-75,000
	Medium (medium towns)	20,000-74,999
	Small (larger village/small town)	5,000-19,999
Village		<5,000
	Minor (hamlet or village)	0-4,999

Source: Office for National Statistics (2023)

- 2.3.5 Although East Horsely has a population of around 6,000, it is classified as a village in the settlement hierarchy and so not considered to be a town for the purposes of this GBA. This is consistent with the ONS classification which recognises that settlements of this size could be a larger village or small town.
- 2.3.6 For the purposes of this assessment, all LBUs are also considered to be towns and therefore, purpose B will apply to all settlements listed in Table 2-2, as is standard practice across Green Belt Assessments. This is because the size and function of LBUs aligns with the definition of towns for the purposes of

⁴ Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/townsandcitiescharacteristicsofbuiltupareasenglandandwales/census2021>

⁵ For the purposes of GBA, it is recognised that some towns also fall into this population range.

Green Belt Assessment and it would be inconsistent to exclude them from purposes relevant to this settlement type.

- 2.3.7 As part of the settlement classification process, Guildford Borough Council has undertaken engagement with neighbouring authorities on the settlement classification approach in order to ensure consistency of approach. Section 2.4 of this report summarises the outcomes of the engagement process and amendments made to the approach to Green Belt Assessment in Guildford as a result of engagement. With regards to the extent of settlements, this study uses the existing Green Belt boundaries where settlements are inset. AECOM has sought wherever practicable to align settlement classifications for Green Belt Assessment with the host authority.
- 2.3.8 Table 2-2 illustrates the final Settlement Classification for Green Belt Assessment in Guildford and Figure 2-2 shows the settlement classification on a map. The Green Belt purposes assessment will not relate to settlements classified as villages, listed in Table 2-3. The remainder of this chapter provides extended narrative on the settlements classification for this GBA.

Table 2-2 Guildford Borough Council settlement classification for Green Belt assessment

Guildford Borough Council	Neighbouring authorities
Large Built Up Areas (as well as being considered towns)	
Guildford	Woking, including West Byfleet
Ash & Tongham (as part of the Blackwater Valley Urban Area)	
Towns (in addition to the above)	
	Cobham/Oxshott
	Bookham/Fetcham
	Godalming/Farncombe

Table 2-3 Guildford Borough Council settlement classification (villages)

Villages (not considered for GBA purposes)		
Albury	Ash Green	Artington
Compton	Chilworth	Eashing
East Clandon	East Horsley	Farley Green
East Horsley and West Horsley (north)	Effingham	Fox Corner
Gomshall	Fairlands	Hurtmore
Holmbury St Mary	Flexford	Ockham
Peaslake	Jacobs Well	Seale
Pirbright	Normandy	Shackleford
Puttenham	Peasmarsh	The Sands
Ripley	Send	Wanborough
Shere	Send Marsh/Burnt Common	Wisley
West Clandon	Shalford	Wood Street Village
Worplesdon	West Horsley	

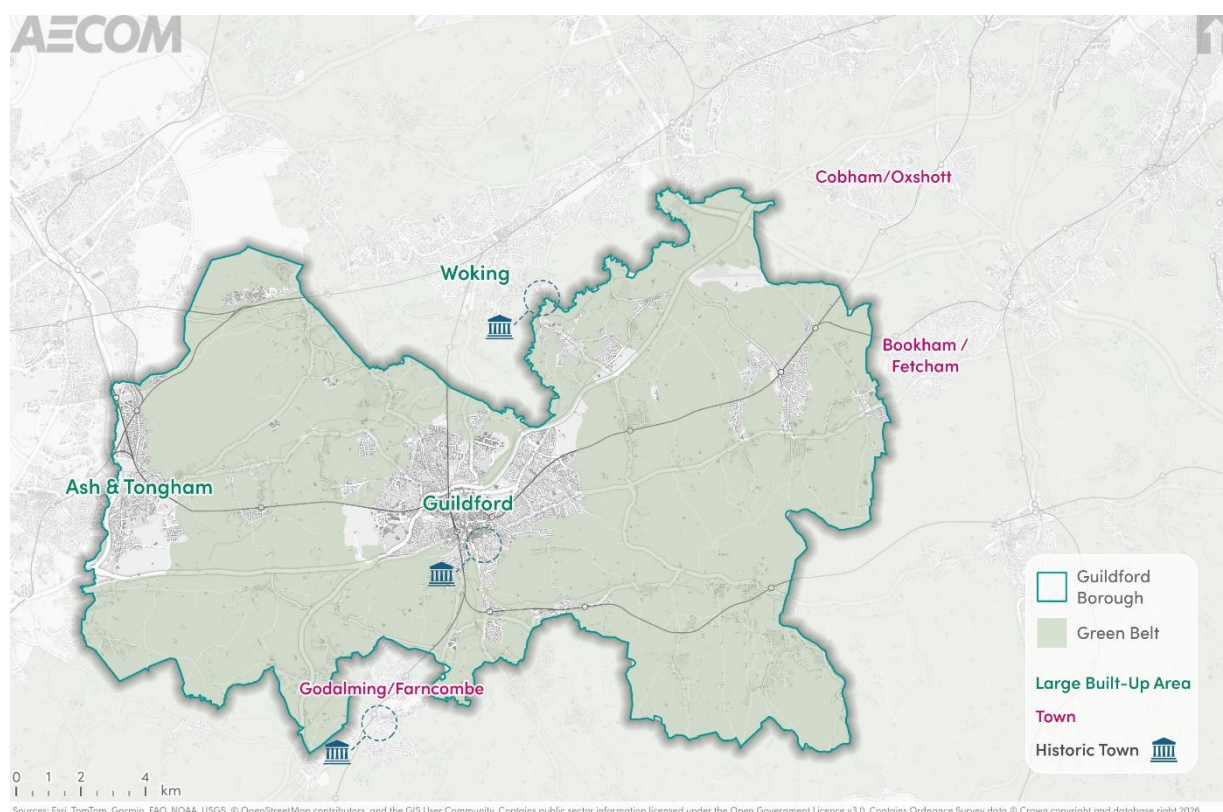


Figure 2-2 Settlement classification for Green Belt assessment

Large built up areas

- 2.3.9 **Guildford and Ash & Tongham** are both identified as urban areas in the 2014 settlement hierarchy which is the highest ranking settlement in the hierarchy. Guildford has been included mainly for functional reasons as the County town and as a sub-regional centre. Ash & Tongham has been included as an LBUA as it forms part of the Blackwater Valley Urban Area. Guildford and Ash & Tongham both have populations consistent with the LBUA settlement type as per Table 2-1.
- 2.3.10 **Woking** has been identified as it sits at Tier One of the centre's hierarchy for Woking Borough (acknowledging that a centre's hierarchy is different to a settlement hierarchy, this status still received weight), has a population above 75,000 and has strategic connectivity with a wide range of services.

Towns

- 2.3.11 **Cobham and Oxshott** are located in the Elmbridge Borough administrative area and have been included as a town because they are contiguous in nature, offer a range of services typical of a town and have a population of around 17,500.
- 2.3.12 **Godalming (including Farncombe)** is located in the neighbouring Waverley Borough administrative area and has been included as a town because of its position in the hierarchy for this LPA and its population of around 23,000.
- 2.3.13 **Bookham/Fetcham** has been classified as a town due to its combined population being ~20,000 which is in the range for the town classification. Leatherhead is a town in its own right, but despite its contiguous relationship with Bookham and Fetcham with no Green Belt gap separating the settlements, it has not been included in the settlement classification for the Guildford GBA because it is too far from the study area to be relevant.
- 2.3.14 **Farnham** has not been included as a town on the basis that it is too far away from the study area to be considered relevant for the assessment of Guildford's Green Belt against the NPPF Green Belt purposes. The developed area west of the Farnham Golf Course (residential development off Compton Way, Crooksbury Road and Camp Hill) could have been relevant to the study but it is not considered to be part of Farnham because of the undeveloped buffer between this developed area and the main built-up area of Farnham. Similarly, Farnham and the developed area abutting the Farnham Golf Course is

not considered to be part of the Ash & Tongham LBUA due to the undeveloped buffer/strategic gap between the two areas.

- 2.3.15 **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.

Historic towns

- 2.3.16 To be considered as a historic town in a Green Belt Assessment, it is necessary for there to be a direct relationship between the historic parts of the town and the Green Belt. Weight is given to historic cores and historic patterns of development within settlements. This could include a conservation area extending out into the Green Belt or the Green Belt forming a defining element of the historic part of a town’s setting. Having a historic core or areas that do not have a strong visual relationship with the Green Belt does not meet this criterion. Designations which might relate to the Green Belt, but not to the identified historic core do not meet this criterion. The 2025 PPG is clear that purpose D “relates to historic towns, not villages” and so to be defined as a Historic town, a settlement must also be defined as a Town for GBA purposes.
- 2.3.17 **Guildford** has been included as a historic town for GBA purposes. Guildford’s town centre is historically significant, with a clear historic core (marked by the town centre Conservation Area) and key views into the surrounding Green Belt which are noted in the Conservation Area appraisal⁶. This central, historic core of Guildford follows the original settlement pattern, from which it has grown. For the purposes of this study, it is this area, its associated designations and its setting, which form the defining qualities of Guildford, which qualify it as a historic town.
- 2.3.18 **Woking town centre and Old Woking** were put forward as a Historic town for GBA purposes following engagement with and at the suggestion of Woking Borough Council. The modern-day core of Woking does not have visual links to Guildford’s Green Belt and is therefore not considered relevant for this study. Old Woking is historically important and sensitive, with clear links to the Guildford Green Belt. Whilst it is a small area and has the qualities of a village rather than a town, it has been classified as a historic town for the purposes of this study in order to align with the approach being taken by Woking Borough Council. 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.
- 2.3.19 **Godalming** has been included as a historic town for GBA purposes, in line with the neighbouring and parallel Waverley GBA. The Godalming historic core does not have visual links to the Guildford Green Belt, however a small part of the Guildford Green Belt is within the setting of Godalming, making this historic town relevant to the Guildford GBA.

⁶ Available at: https://guildford.gov.uk/media/8005/Town-Centre-Conservation-Area-Appraisal/pdf/Guildford_town_centre_CAA_low_res_.pdf?m=1471873542897

2.4 Engagement with neighbouring authorities

- 2.4.1 Guildford Borough Council undertook engagement with neighbouring authorities to secure a consistent approach to settlement classification in the assessment of Green Belt.
- 2.4.2 Responses were received from Woking Borough Council, Mole Valley District Council and a joint response from Spelthorne District Council, Elmbridge Borough Council and Runnymede Borough Council. Table 2-4 summarises the engagement responses received and how these have influenced the approach taken to this study.

Table 2-4 Engagement with neighbouring authorities

Neighbouring authority	Engagement response summary
Woking Borough Council	- Woking Borough Council identified Woking (relevant historic aspects being Old Woking Conservation Area and conservation areas in Woking town centre) as a historic town for Guildford's GBA. AECOM and GBC have proceeded on the basis that Working town centre is not relevant to Guildford's Green Belt as a historic town for GBA purposes because it does not have a clear visual link. Old Woking has been included because it has an obvious link with the Green Belt in Guildford, and the settlement classification has been aligned as far as practicable with the host authority. - Woking also suggest Weybridge/Brooklands to be included as an LBUA and for Byfleet to also be included as a town. AECOM has not included Weybridge/Walton as an LBUA in response to this request because it is inconsequential to Guildford's GBA and have not included Byfleet as a town in this assessment on the basis it is too far from Guildford's Green Belt to be considered relevant.
Mole Valley District Council	- Mole Valley District Council requested minor amendments to the settlement classifications as follows. - Replace "Great Bookham" with "Bookham", as Great and Little Bookham now form a single settlement. AECOM and GBC have implemented this change. - Remove Leatherhead from the Large Built-Up Area, as Leatherhead and Fetcham remain largely separate and are only connected in planning terms by the B2122. AECOM and GBC have implemented this change but are treating Bookham/Fetcham as a town, as discussed above.
Spelthorne District Council, Elmbridge Borough Council and Runnymede Borough Council (Joint Response)	- Spelthorne, Elmbridge and Runnymede provided a joint response to the proposed approach to GBA in Guildford. Points raised were mainly in relation to the approach to and outcomes of the settlement classification. We refer here to only relevant substantive points. - Proposed to include Weybridge/Walton as a LBUA. AECOM and GBC have not implemented this request. - Questioned including Fetcham/Bookham/Leatherhead as a LBUA. AECOM and GBC have included Bookham/Fetcham only as a town.
Surrey Heath Borough Council and Waverley Borough Council	AECOM is delivering parallel GBAs on behalf of Surrey Heath Borough Council and Waverley Borough Council and have made every effort to ensure the GBA methodologies align between these authorities.

2.5 Purposes assessment

Overview

- 2.5.1 This section of the report will explain and describe the approach taken to assessment of AAs against the five NPPF Green Belt purposes.
- 2.5.2 AECOM has undertaken the assessment of identified AAs in line with the method set out in the 2025 Green Belt PPG. Although only purposes A, B and D are relevant to the identification of grey belt, AECOM has assessed the Green Belt against all NPPF purposes, including C and E. In the absence of any guidance for assessing purpose C in the PPG, purpose C has been assessed in line with the previous Green Belt and Countryside Study (2013). All AAs have been assessed equally against purpose E as there is no spatial differentiation.
- 2.5.3 The Green Belt purposes, as set out in policy GB2 of the NPPF, are as follows:
- Purpose A** – Check the unrestricted sprawl of LBUAs
 - Purpose B** – Prevent neighbouring towns merging into one another
 - Purpose C** – Assist in safeguarding the countryside from encroachment
 - Purpose D** – Preserve the setting and special character of historic towns.

- **Purpose E** – Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.5.4 The criteria set out in the 2026 NPPF (Annex E) and PPG for determining contributions to the NPPF Green Belt purposes sets out a 3-point scale for summarising contributions – Strong, Moderate, Weak/None. AECOM has split the ‘weak/none’ contribution classification set out in the PPG into two separate classifications for the purpose of this assessment in order to make explicitly clear where AAs do not meet the purpose criteria at all because that purpose is not engaged (e.g.. where the AA is not adjacent or near to a LBUA so purpose A cannot apply). This approach makes for a more definitive assessment of AAs and accordingly, identification of grey belt.
- 2.5.5 Assessment against the NPPF purposes A, B and D has been led as far as is practicably possible by the illustrative features for each contribution classification as set out in the PPG in order to reach the most robust conclusions possible. However, where reasonable interpretation of the phrases used in the PPG was required, professional planning judgement has been made and applied consistently across the study. The following purpose assessment sections of this methodology set out any definitions or interpretations made as part of the assessment of Green Belt AAs in Guildford.
- 2.5.6 AECOM has also undertaken a high-level comparison of the findings of this study and the previous Green Belt and Countryside Study 2013 to ensure findings are reasonable, notwithstanding the new approach set out in the PPG. This involved reviewing the earlier assessment conclusions alongside the current assessment outcomes and considering whether the previous sensitivity scores were reasonably aligned with the purpose-based assessment from AECOM’s GBA.
- 2.5.7 Where notable differences in assessment outcomes were identified, these were examined on a purpose-by-purpose basis to understand the factors influencing the variation. Each purpose score was carefully reviewed, and it was determined that discrepancies were primarily the result of differing methodologies and/or variations in the criteria applied in the two assessments. In particular, the previous Green Belt assessment had applied Green Belt purposes not only to towns but also to villages, which has contributed to variation in outputs. The previous study also adopted a broad and relatively loose definition of historic towns. In addition, some of the assessment areas identified for the previous Green Belt assessment study were divided into smaller, more granular parcels for this assessment, leading to some differentiation in scorings. Overall, these differences reflect the distinct approaches taken in each study rather than any underlying inconsistency in the analysis, and reflect a more up-to-date, consistent and policy-aligned approach in line with current national guidance.

Site visits

- 2.5.8 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.
- 2.5.9 The desk-based assessment identified AAs that required more detailed evaluation through a site visit. These scenarios largely included;
- Assessment of visual separation between towns as part of assessment against purpose B;
 - Assessment of views into/out of historic cores of settlements as part of assessment against purpose D;
 - Where aerial photography and GIS data was unreliable or out of date;
 - Where current land use or nature of built form on site could not be verified through desk-based assessment;
 - To confirm the boundary treatments of an AA;
 - To validate desk-based assessments where there was any reasonable uncertainty.

Purpose A

- 2.5.10 Purpose A seeks to “**check the unrestricted sprawl of large built up areas**” and as such is only applied to AAs that are adjacent or near to the Large Built Up Areas (LBUA’s) as identified in the settlement classification exercise. The PPG is clear that this purpose relates only to the sprawl of

LBUA's, and that villages should not be considered large built up areas. Table 2-5 sets out the illustrative features for each contribution classification as presented in Annex E of the NPPF.

Table 2-5 Purpose A illustrative features

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: • be adjacent or near to a large built up area; and • if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land's contribution to this purpose a, such as (but not limited to): • having physical feature(s) in reasonable proximity that could restrict and contain development • be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development • contain existing development • being subject to other urbanising influences
Weak or none	Assessment areas that make only a weak or no contribution are likely to include those that: • are not adjacent to or near to a large built up area • are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Source: Green Belt PPG (2025)

2.5.11 The NPPF or PPG go no further than what is set out in the illustrative features to define considerations for assessment against purpose A. As such, this study has been undertaken on the basis of the following definitions:

- **“Free of existing development”** is defined as meaning largely but not necessarily entirely free of development, as it is unlikely an AA will be entirely free of development. In particular, development listed in NPPF policy GB7 as not being inappropriate in the Green Belt, which includes buildings for agriculture, does not count as ‘development’ in this definition.
- **“Adjacent to...”** with regards to LBUA's is defined as “sharing a boundary with”.
- **“Near to...”** with regards to LBUA's is generally defined as being close enough that any gap would effectively be closed if the land was developed. Professional judgement has been made with regards to which AAs are not adjacent but ‘near to’ the LBUA and to do this, consultants made a high-level assessment of the extent to which the development of the AA could reasonably be defined as sprawl after taking into account any undeveloped buffer between the edge of the LBUA and the AA boundary. Any prominent landforms between an AA and LBUA are likely to prevent the site from being considered “adjacent or near to”.
- **“Incongruous pattern of development”** is defined as a pattern of development that is notably different from the prevailing pattern in the settlement. Development that would cause coalescence of the LBUA with a nearby village that then forms an extended finger is also defined as incongruous in this study.
- **“If developed”** has been interpreted to mean development of the entire AA.
- **“Physical features...that could restrict and constrain development”** has been interpreted to include natural and landscape features, including topography, as well as human-made features including (but not limited to) hedgerows, treelines, roads, canals, existing development and built form.
- **“Partially enclosed by existing development, such that new development would not result in an incongruous pattern of development”** is defined as having development and existing built form (not natural or landscape features) on at least two sides.
- **“Largely enclosed by significant existing development”** is defined as having development and existing built form (not natural or landscape features) on at least three sides, or two sides where an AA more closely resembles a triangle.
- **“Within a reasonable proximity”** (with regards to physical features to restrict and contain development) has been interpreted as the boundaries of the AA for the avoidance of doubt.

- **“Other urbanising influences”** are defined as other built form in addition to development defined as being inappropriate in the Green Belt as per policy GB7 of the NPPF.
- 2.5.12 AECOM has undertaken this assessment on the basis that purpose A calls for the review of four main variables, and the accompanying narrative in the assessment proforma is structured as to cover these points consistently across the study. These are:
- i. Presence of existing development and other urbanising influences;
 - ii. Enclosure of AA by existing development;
 - iii. Identification of physical features in a reasonable proximity to restrict and contain development; and
 - iv. Incongruity of the pattern of development in a hypothetical scenario of development of the AA.
- 2.5.13 To perform strongly, an AA must (i) be free of existing development, and (ii) lack physical features to restrict and contain development, and (iii) form an incongruous pattern of development if developed.
- 2.5.14 Where an AA fails to meet all three of these criteria, a judgement was made as to whether the AA meets the PPG criteria for moderate. The criteria for moderate introduce a new illustrative feature – being subject to other urbanising influences. To be moderate, AAs that do not meet the criteria for strong must have at least one of (i) having physical restricting and containing features in reasonable proximity, or (ii) being partially enclosed and/or not forming an incongruous development pattern, or (iii) containing existing development, or (iv) being subject to other urbanising influences.
- 2.5.15 AAs that do not meet the criteria for strong or moderate were then, by elimination, considered to perform weakly or not at all against purpose A. AAs were concluded to perform weakly where they were partially or largely enclosed and/or contained a significant amount of existing development but not developed in full.
- 2.5.16 AAs that were assessed as making ‘No Contribution’ to purpose A were either (a) not adjacent or near to an LBUA or (b) already developed in full, therefore making no contribution to the prevention of unchecked sprawl on the basis they were already contributing to sprawl of the LBUA.

Purpose B

- 2.5.17 Purpose B seeks to **“prevent neighbouring towns merging into one another”**. The NPPF is explicit in its clarification that this purpose relates to the merging of towns and cities, not villages. As such, only the towns identified in the settlement classification exercise were considered with regards to assessment against purpose B. Table 2-6 sets out the illustrative features for each contribution classification as presented in Annex E of the NPPF.

Table 2-6 Purpose B illustrative features

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: • forming a substantial part of a gap between towns; and • if developed, would be likely to result in the loss of visual separation of towns
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): • forming a small part of the gap between towns • being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or none	Assessment areas that contribute weakly are likely to include those that: • do not form part of a gap between towns, or • form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Source: Green Belt PPG (2025)

- 2.5.18 The NPPF or PPG go no further than what is set out in the illustrative features to define considerations for assessment against purpose B. As such, this study has been undertaken on the basis of the following definitions:

- As with purpose A, “**free of existing development**” is defined as meaning largely but not necessarily entirely free of development and, in particular, does not include the Green Belt exceptions in NPPF policy GB7. The most relevant of these exceptions is generally buildings for agriculture and forestry.
 - “**Substantial part of a gap between towns**” and “**small part of the gap between towns**” have been reviewed on a case-by-case basis, depending on local circumstances such as topography, physical connections and the size of the gap. As a very general guide, the following quantifiers have been used in the assessment to describe the gap between towns:
 - **Substantial:** all or most of the gap between towns (most of meaning more than half of)
 - **Relatively substantial:** around a third of the gap but not the majority of the gap (i.e not more than half of the gap)
 - **Relatively small:** Below a third of the gap but not small enough to be considered inconsequential to purpose B.
 - **Small/very small:** Any gap less than relatively small that is considered inconsequential for purpose B.
 - “**Towns merging into one another**” is primarily defined as the loss of physical separation between towns. Visual separation (the ability to see one town from another) and perceived separation (the extent to which people appreciate there to be a gap) can also be considerations, albeit more subjective ones.
 - “**Visual separation**” is considered in relation to whether there would be an impact on the views from the site/area being considered to nearby towns, as well as on the views from the edges of those towns to the site/area. This has been assessed from the AA to the edge of the town in question.
- 2.5.19 Purpose B applies to settlements defined as LBUA's as well as those defined as towns. Therefore, the gaps relevant to this study are as follows:
- Guildford to Woking
 - Guildford to Cobham/Oxshott
 - Guildford to Bookham/Fetcham
 - Guildford to Godalming
 - Guildford to Ash & Tongham
 - Woking to Cobham/Oxshott
 - Woking to Bookham/Fetcham
 - Ash & Tongham to Godalming
 - Ash & Tongham to Woking

Purpose C

- 2.5.20 Purpose C seeks to “**assist in safeguarding the countryside from encroachment**”. This purpose is inconsequential to the identification of grey belt, and there is no guidance on how to assess the Green Belt against purpose C in the 2025 PPG. In the absence of guidance, AECOM has assessed purpose C in line with the Green Belt and Countryside Study (2013) by Pegasus in order to remain consistent with previous approach – see Appendix C.
- 2.5.21 The initial part of the study proposed a methodology which required a land parcel to contain or directly adjoin notable development in order that encroachment could potentially occur from it. This resulted in land parcels which contained more than incidental countryside development being considered to serve the encroachment purpose, but undeveloped parcels not fulfilling this purpose and being scored accordingly. Parcels were assessed on a 2-point scale, with parcels containing existing development scored 1, and parcels with incidental human presence scoring 0.
- 2.5.22 The Volume II Addendum (see Appendix C) reviewed this approach and set out an alternative method which aligned the assessment with the characteristic of ‘openness’ of the Green Belt as referred to within the NPPF. This approach maintained the 2-point scale for assessments. The methodology that was then used, and replicated in this part of the 2026 GBA assessment is as follows:
- 2.5.23 *“In order to assess whether land parcels perform this purpose, consideration will be given to the extent to which the countryside within a parcel had already been built upon. If the parcel is strongly influenced*

by built development or urban influences, it will be assumed that this part of the countryside has already been notably encroached by development, and as a result is no longer able to perform this purpose. If however, the parcel remains primarily free of development, possessing predominantly unspoilt countryside or uses defined as appropriate in the Green Belt, then it may be considered that encroachment has not yet occurred and the parcel continues to perform the purpose"

- 2.5.24 Two conclusions can therefore be drawn with regards to purpose C, as exemplified in the Green Belt purposes Schedule (see Appendix C). For consistency, AECOM has re-used the text to accompany the conclusions for purpose C from the Pegasus Study as follows:
- **Contribution:** Minimal existing development therefore safeguards the countryside from encroachment.
 - **No Contribution:** Does not assist in safeguarding the countryside from encroachment.
- 2.5.25 In calculating the overall performance against Green Belt purposes, "contribution" has been given equal weight to "strong contribution" as per purposes A, B and D, and "no contribution" has been given equal weight to "no contribution" as per purposes A, B and D.

Purpose D

- 2.5.26 Purpose D seeks to "**preserve the setting and special character of historic towns**". The NPPF sets out that this purpose relates only to historic towns, and not villages. As such, only the historic towns identified in the settlement classification exercise were considered with regards to assessment against purpose B. Table 2-7 sets out the illustrative features for each contribution classification as presented in Annex E of the NPPF..

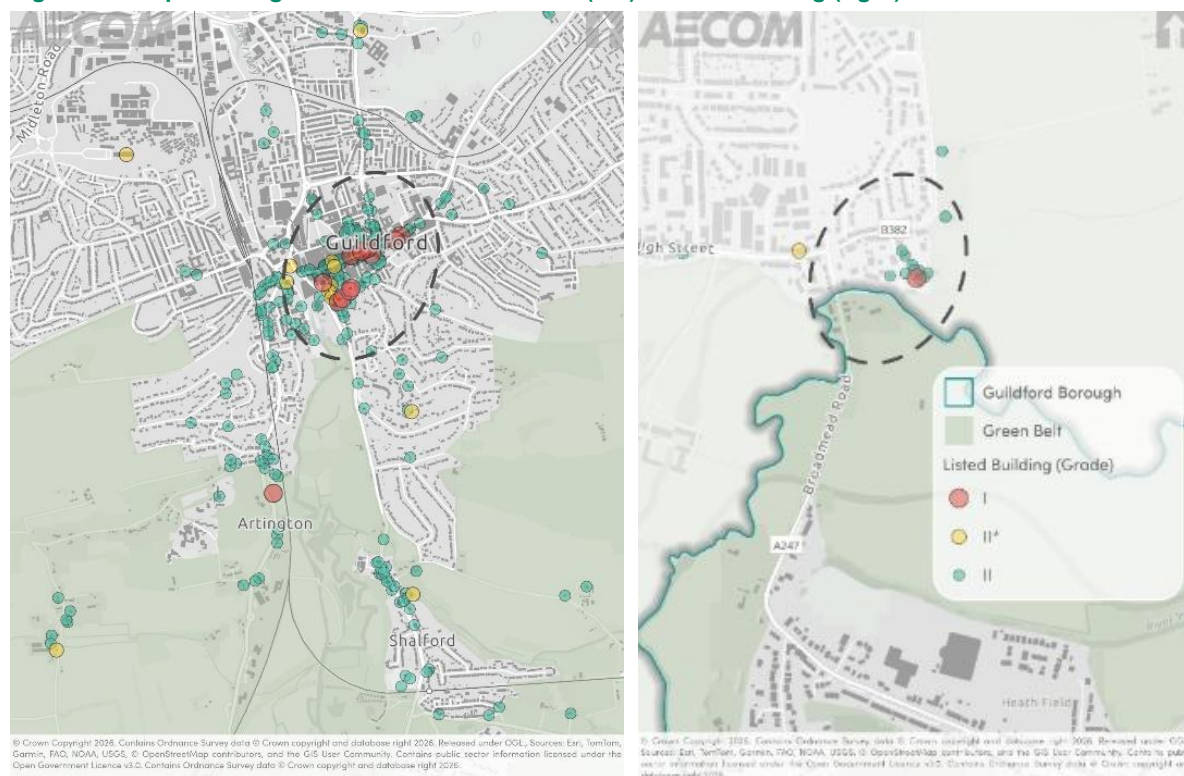
Table 2-7 Purpose D illustrative features

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: • form part of the setting of the historic town • make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town
Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): • being separated to some extent from historic aspects of the town by existing development or topography • containing existing development • not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: • do not form part of the setting of a historic town • have no visual, physical, or experiential connection to the historic aspects of the town

Source: Green Belt PPG

- 2.5.27 The assessment seeks to determine the contribution an assessment area makes towards purpose D, by considering its role within and relationship to the identified historic core, its designations and visually important areas which make up its/their setting. Whilst other designations located within, or nearby to, a historic town are considered, it is their contribution to the defining qualities of the identified historic town which are considered in determining its performance against this purpose.
- 2.5.28 Assessments consider land around and nearby to the identified historic towns in their entirety, although the focus of purpose D assessments seeks to identify the 'setting and special character' of historic towns, which, for the purposes of this assessment, focuses on the historic core of settlements.
- 2.5.29 **Guildford's** historic core (Figure 2-3) is found in the south of the built-up area and broadly delineated by the Town Centre Conservation Area, including its high density of Grades I, II* and II listed buildings. The historic core of **Old Woking** comprises a number of Grade I, II* and II listed buildings and a conservation area is found in the south of the Woking Large Built-Up Area, with strong visual ties to Guildford's Green Belt. The entirety of the **Godalming** historic town, specifically conservation areas, were evaluated in line with the emerging Waverley Green Belt Assessment.

Figure 2-3 Map showing historic core of Guildford (left) and Old Woking (right).



2.5.30 Heritage specialists at AECOM have reviewed and approved this approach, and have also assisted in the drafting and review of conclusions drawn with regards to purpose D.

Purpose E

2.5.31 Purpose E seeks to “**assist in urban regeneration, by encouraging the recycling of derelict and other urban land**”. All AAs are considered to perform equally against this purpose because they all, by nature of designation as Green Belt, encourage the recycling of derelict and other urban land as intended. For this reason, no further conclusions against purpose E have been drawn and purpose E is not included in the Assessment Proforma Appendix B.

Overall performance of the NPPF purposes

2.5.32 Two conclusions are drawn with regards to the overall NPPF purposes conclusion. One for all purposes assessed (purpose A, B, C and D) and one for the purposes considered in identifying grey belt (purpose A, B and D). For both conclusions, the principles for calculating the final outcome are the same.

2.5.33 For a **Strong** overall contribution, an AA must score strongly against at least one of the purposes.

2.5.34 For a **Moderate** overall contribution, an AA must not score strongly against any of the purposes but must score moderately against at least one of the purposes.

2.5.35 For a **Weak** overall contribution, an AA must not score strongly or moderately against any of the purposes but must score weakly against at least one of the purposes.

2.5.36 For **No Contribution** overall, an AA must make No Contribution to any of the purposes.

2.6 Drawing grey belt conclusions

2.6.1 As per the PPG on Green Belt, grey belt is identified through triangulation of NPPF purpose Assessments (A, B and D only). Two conclusions can be made with regards to the grey belt assessment in that an AA can be identified as grey belt and not grey belt.

2.6.2 Table 2-8 sets out how grey belt has been identified using the outputs of the NPPF purposes Assessment.

Table 2-8 AA conclusions matrix

Contributes strongly to purpose A, B or D?	Conclusion
Yes	Not grey belt
No	Grey belt

2.7 Approach to allocations and commitments

- 2.7.1 To maintain the study's future-readiness and to ensure the findings of this GBA account for the impact of potential future planned or committed development, allocated sites and committed development have been treated as developed where they are within or adjacent to the Green Belt and as such where it is considered that their delivery would impact the performance of the impacted AAs. This relates to the assessment of purposes A, B and D only, in recognition of the fact that these purposes are consequential to the identification of grey belt and as such are most strategically important in long-term planning.
- 2.7.2 **Allocations** from the adopted Local Plan have been reviewed in light of the assessment findings where they intersect with or are adjacent to AAs within the Guildford Green Belt. A screening exercise was undertaken to evaluate the potential impact on the assessment of AAs. Of Guildford's allocations, the below were considered in the Green Belt purpose assessment:
- Blackwell Farm (including site access)
 - Land at Gosden Hill Farm
- 2.7.3 In addition, **consented sites** have only been reviewed in light of assessment findings where over 100 dwellings have been granted planning permission, and where the committed site intersects with or is adjacent to AAs within the Guildford Green Belt. NSIP's have not been reviewed as part of this exercise. A screening exercise was undertaken to evaluate the potential impact on the assessment of AAs. Only one commitment was therefore considered in the Green Belt purpose Assessment:
- Land at Effingham Lodge Farm - 21/P/01306 (Appeal ref: 3298341)
- 2.7.4 The identified allocations and commitments have been treated as if they were already built out, to ensure the findings of this study remain relevant when development is delivered. A high-level review has been undertaken only on the basis that **some** development is very likely to come forward within the site boundary in question. This approach does not make assumptions about the scale, character, type, density or any other variable with regards to the development that is likely to come forward in recognition of the fact that there is no certainty that what is consented or allocated is what will be delivered on the ground. It is not proportionate to the needs of the study to evaluate the specific details of each allocation and commitment on the basis this would form a point-in-time conclusion only. Therefore, the review of allocations and commitments impacting the assessment of Guildford's Green Belt should be interpreted as an illustrative approximation of potential impacts on the AA in question, rather than a definitive statement on the implications that each allocation and commitment will have for the AA in question.
- 2.7.5 Allocations and consents outside of the Guildford administrative boundary have not been taken into account.

2.8 Wider impact assessment

- 2.8.1 The final stage of the PPG guidance on Green Belt Assessment is to identify if the release or development of the AAs would **fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan**. This step recognises that whilst development or release of a single AA in isolation would be unlikely to fundamentally undermine the purposes of the remaining Green Belt at the plan area scale, clusters of AAs could.
- 2.8.2 The primary role of this phase of the study is to identify grey belt. There will be a further phase of work, also undertaken by AECOM, to carry out technical site-specific work to help inform the Council's spatial strategy and site allocations. This initial phase of work does not therefore consider the fundamental undermining of the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan. Instead, this will be undertaken as part of the next phase once there is greater certainty on the proposed spatial strategy and site allocations. This will allow a more robust assessment of the actual cumulative impact that any proposed Green Belt release would have, to inform the assessment of whether exceptional circumstances exist to amend Green Belt boundaries. In

the meantime, the findings of this report will support local decision-making through the development management process on a site-by-site basis.

3. Assessment Findings

3.1 Introduction

- 3.1.1 This section of the report presents the findings of the GBA, broken down by individual assessment stages and as whole when identifying overall performance against the NPPF purposes and when identifying grey belt.
- 3.1.2 575 AAs were identified in the Guildford Green Belt. The following tables set out the findings of this study through number of AAs falling into each assessment outcome, and the following figures present a visual representation of the assessment findings.
- 3.1.3 Appendix A sets out the full assessment outcomes for each AA and the accompanying GBA Appendix B contains the assessment proformas for each AA which include mapping and commentary to accompany the contributions.

Table 3-1 Overall findings of the purposes assessment

Conclusion category	Number of AAs			
	Strong	Moderate	Weak	No contribution
Purpose A	21	47	16	491
Purpose B	1	69	382	123
Purpose C	342 ⁷	n/a	n/a	233
Purpose D	4	7	68	496
Highest contribution (A, B, C and D)	344	25	164	42
Highest contribution to grey belt purposes (A, B and D)	24	97	355	99

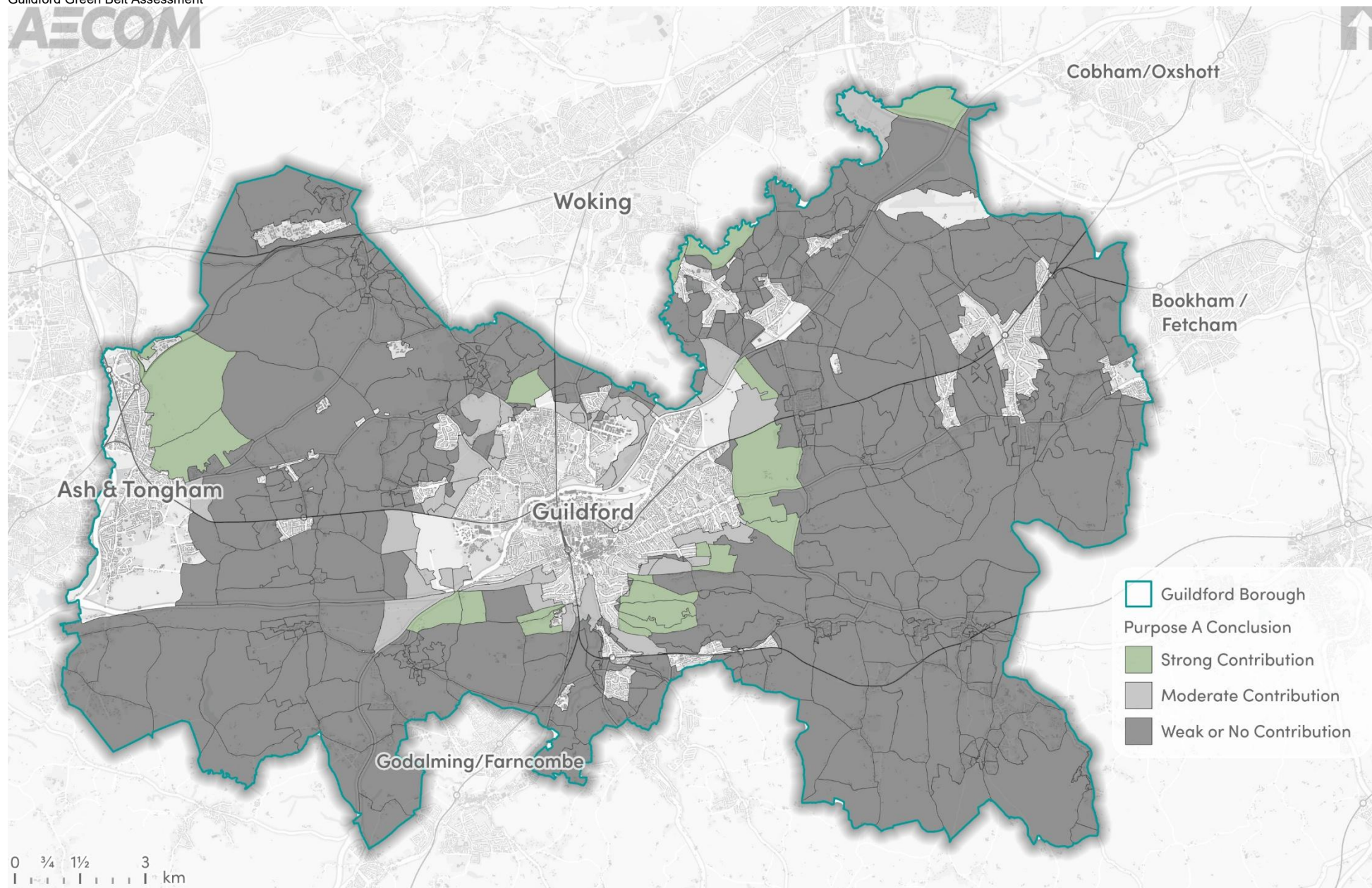
Source: AECOM (2026)

Table 3-2 Overall findings – grey belt identification (purposes A, B and D)

Grey belt category	Number of AAs
Grey belt	551
Not grey belt	24

Source: AECOM (2026)

⁷ This column includes AAs assessed as making a Contribution to Purpose C. The Strong/Moderate/Weak assessment scale is not used in this context.



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Figure 3-1 Map of purpose A assessment findings

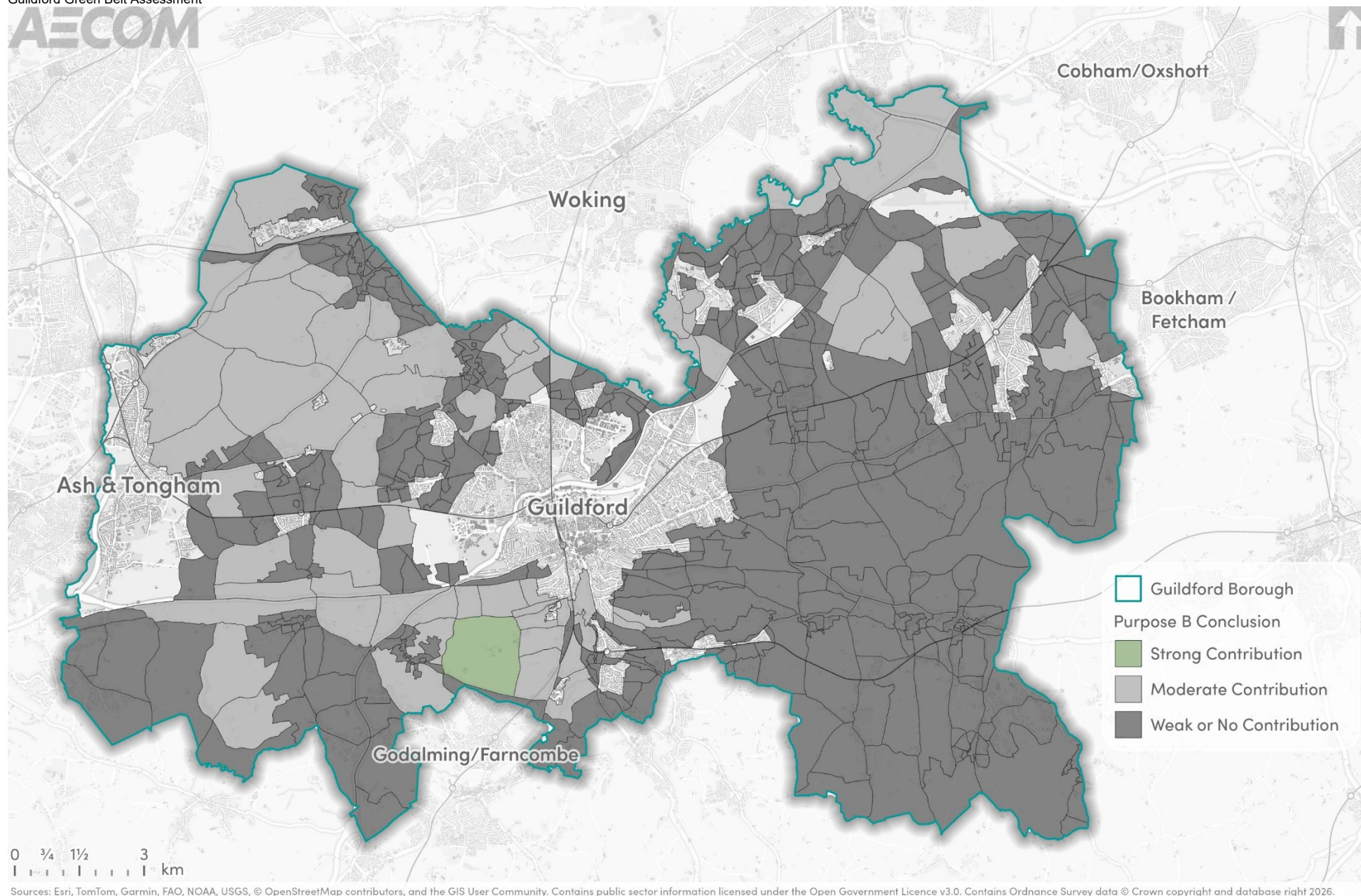
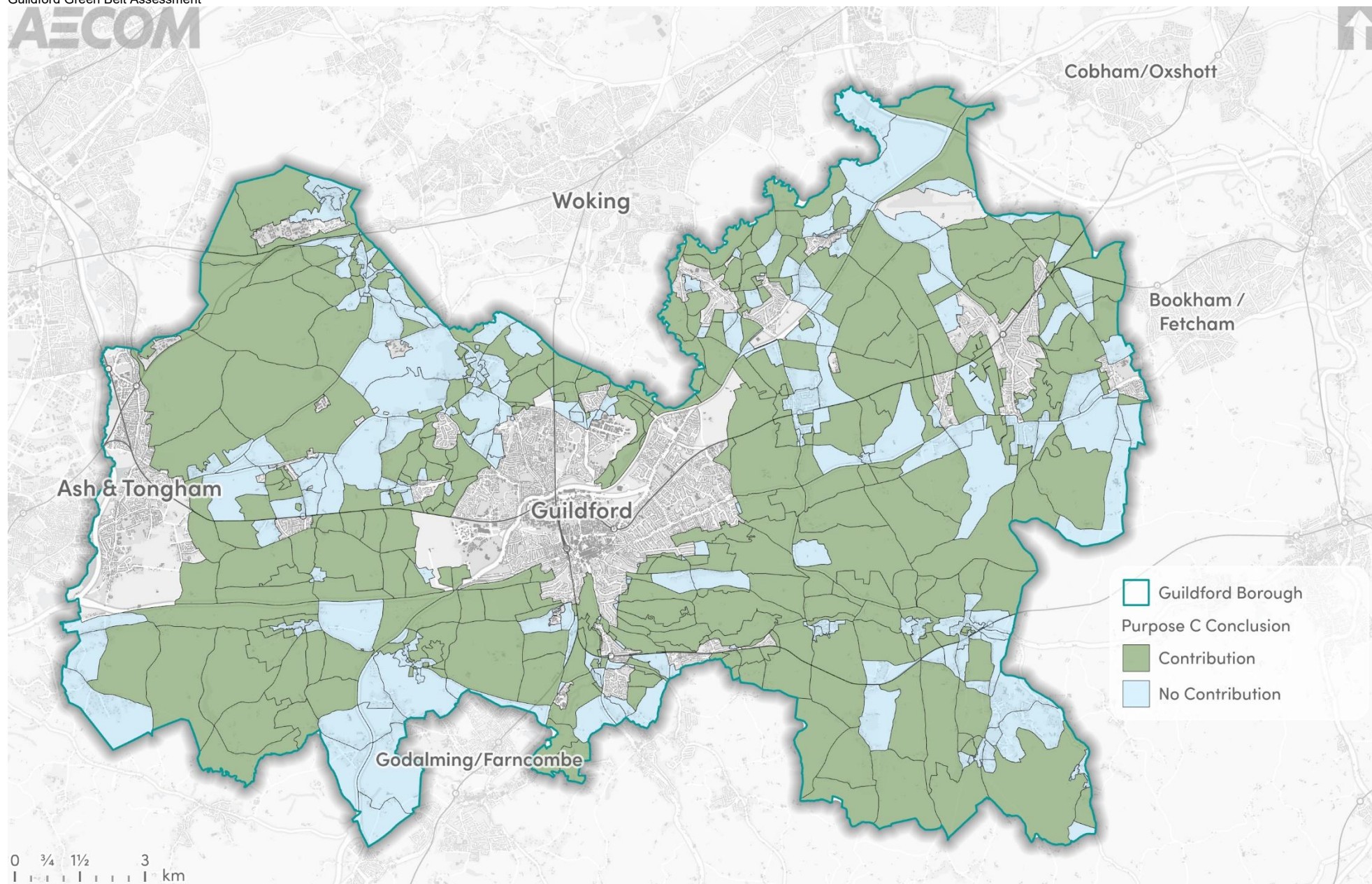


Figure 3-2 Map of purpose B assessment findings



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Figure 3-3 Map of purpose C assessment findings

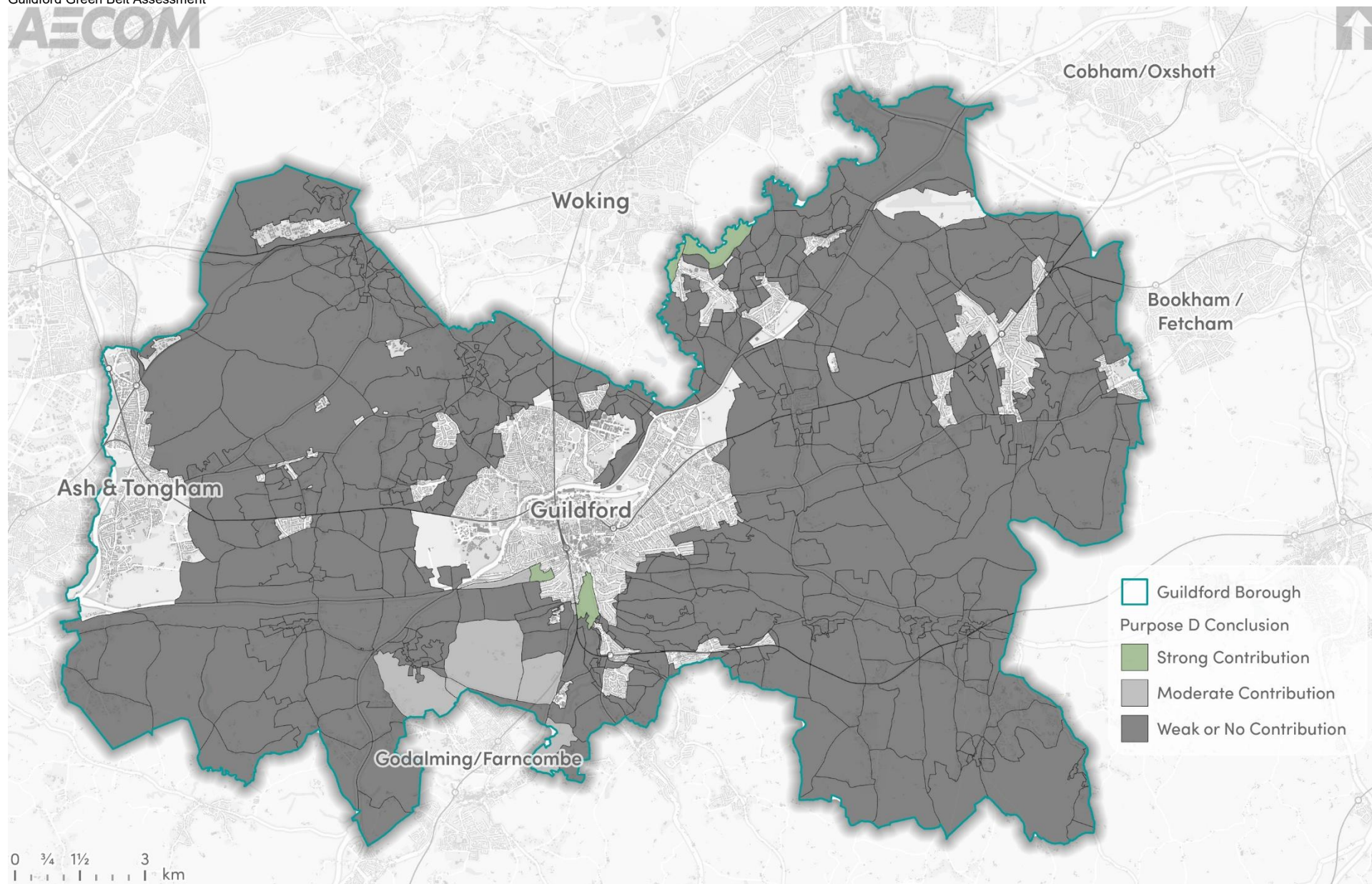
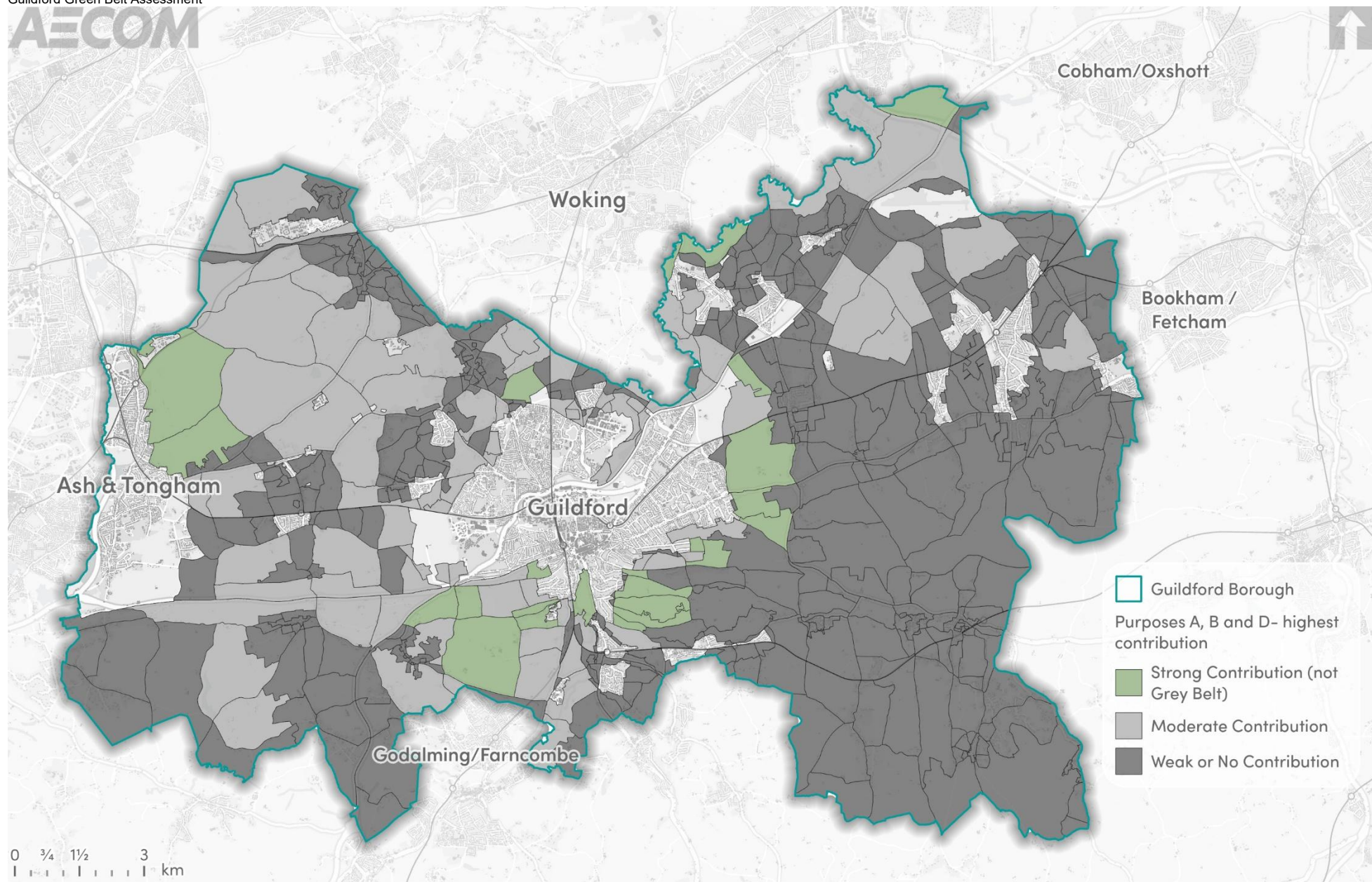


Figure 3-4 Map of purpose D assessment findings



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Figure 3-5 Map of overall purposes A, B and D highest contribution assessment findings

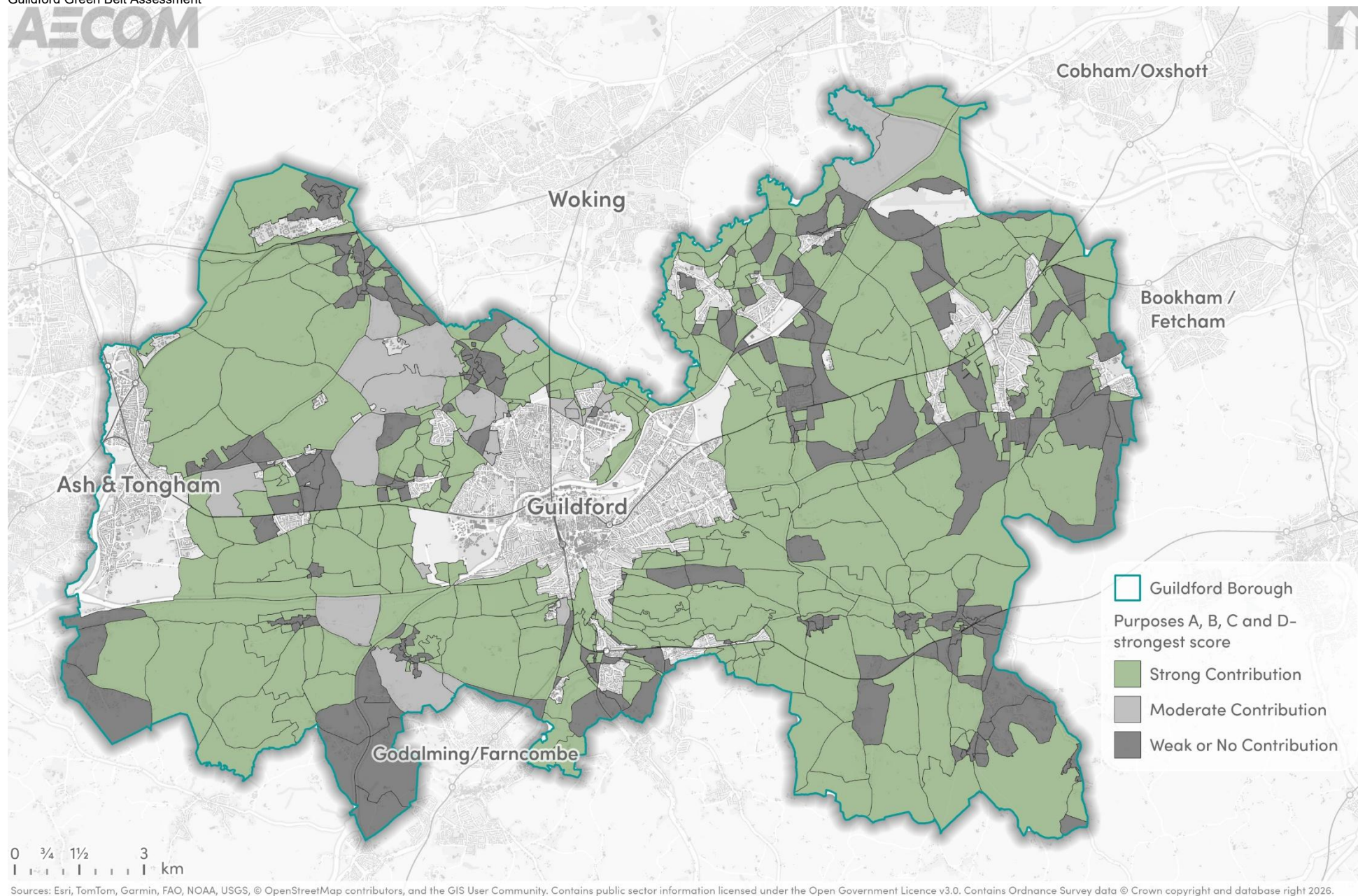
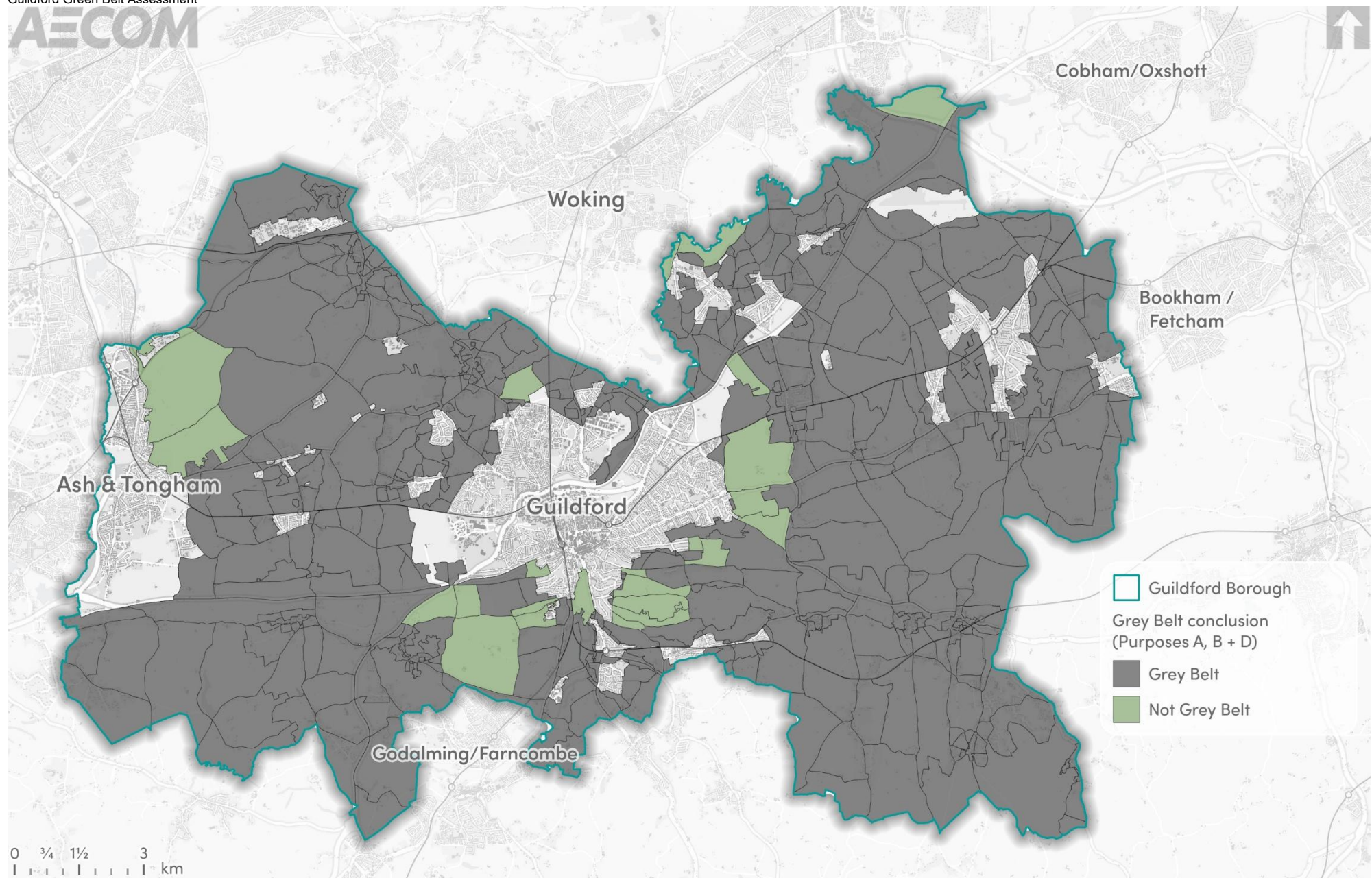


Figure 3-6 Map of overall purposes A, B, C and D highest contribution assessment findings



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Figure 3-7 Map of grey belt conclusions (Purposes A, B and D)

4. Conclusions

- 4.1.1 This GBA has been prepared using the latest Green Belt PPG to assess the Green Belt in Guildford against the five Green Belt purposes and to identify grey belt land within the study area. The conclusions are intended to support and underpin the plan-making and decision-making process with regards to potential future development within the Green Belt.
- 4.1.2 This GBA has identified that 92% of the Green Belt has been identified as grey belt, arising where AAs did not perform strongly against NPPF purpose A, B or D. The remaining 8% of the Green Belt in Guildford does not fall under the definition of grey belt as set out in the 2026 NPPF and 2025 Green Belt PPG.
- 4.1.3 As illustrated in this report, **definition of land as grey belt does not also mean it is suitable for development**. Definition as grey belt simply means land does not perform strongly against the NPPF Green Belt purposes A, B or D. As such, these findings can be used as evidence to inform a review of Green Belt boundaries and to inform development management decision making, but do not in themselves indicate an AA is suitable for Green Belt release.

Recommended next steps

- 4.1.4 The Council will need to carefully consider whether exceptional circumstances exist for the justification of the review and alteration of the Green Belt boundary in the plan-making process, as set out in the NPPF. The Council can use the findings of this report to support future plan-making decisions and to support decision-making as part of the development management process.
- 4.1.5 In terms of next steps, there will be a further phase of work, also undertaken by AECOM, to carry out a wider impact assessment to help inform the Council's spatial strategy and site allocations. This will happen once Guildford Borough Council has identified candidate site allocations and a draft spatial strategy. The assessment will be undertaken to understand whether the cumulative impact of removing sites from the Green Belt would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan.
- 4.1.6 Where exceptional circumstances for reviewing the Green Belt boundary do exist, the Council should ensure that land released from the Green Belt is suitable in terms of sustainability, deliverability and any other wider planning considerations. This step emphasises the fact that not all land identified as grey belt is, in practice, suitable for development.