

# GUILDFORD BOROUGH GREEN BELT AND COUNTRYSIDE STUDY

## Volume I

On behalf of Guildford Borough Council



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GREEN BELT AND COUNTRYSIDE STUDY**

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*On behalf of Guildford Borough Council*

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## **1 NON TECHNICAL SUMMARY**

### *Background to the Green Belt within Guildford Borough*

- 1.1 The Metropolitan Green Belt was established under the London Home Counties (Green Belt) Act 1938 and the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF).

### *Purpose of the Study*

- 1.2 The purpose of this Study is to review land within Guildford Borough to determine appropriate Potential Development Areas (PDAs) for future housing and other growth requirements, if suitable land cannot be identified within built-up areas. The Study will assist spatial decision making and the future allocation of land for potential development within the surroundings of urban areas at Guildford, Tongham and Ash and on the periphery of villages across the Borough. It is intended that this Study forms part of the evidence base for future development and allocations up to 2030. External decisions on which Potential Development Areas (PDAs) to allocate would be considered in due course by Guildford Borough Council, alongside the consultation of many other documents and studies that input into the emerging Local Plan.

### *Scope of the Study*

- 1.3 The Study has assessed land in relation to Green Belt planning policy, sustainability criteria and environmental capacity to determine appropriate areas for future development within the Borough. The Study has examined land across the Borough within Volumes I, II, III and IV as follows:
- Volume I - Summary, Introduction and Background to the Study
  - Volume II - Green Belt and 'Countryside beyond the Green Belt' within the surroundings of the urban areas at Guildford, Tongham and Ash (October 2009)

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- Volume III - Green Belt surrounding villages across the Borough (October 2011)
  - Volume IV - Insetting of villages from the Green Belt (November 2012)
- 1.4 The assessment of Green Belt and 'Countryside beyond the Green Belt' on the periphery of urban areas commenced in June 2009, with the review of villages located outside of the designated Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Thames Basin Heath Special Protection Area (SPA) undertaken between May and October 2011.
- 1.5 When identifying PDAs across the Borough, consideration has been given to how well parcels of land serve the purposes of the Green Belt (as defined within PPG2 and the NPPF), whether there are environmental considerations which resist development of the land, and how sustainable such parcels are.
- 1.6 The methodology is set out in detail in Volumes II and III, but in brief; following the identification of parcels of land, such parcels were scored based upon their current adherence or otherwise to the purposes of the Green Belt. In particular this included the ability to check the unrestricted sprawl of large built up areas, the prevention of neighbouring towns from merging into one another, assistance in safeguarding the countryside from encroachment, and the preservation of the setting and special character of historic towns.
- 1.7 For the main urban areas, those parcels which scored poorly against the Green Belt purposes were considered to offer the best opportunity to introduce development in adherence with Green Belt guidance, thereby maintaining without development the better performing areas of the Green Belt. The low scoring parcels were then assessed against sustainability criteria and environmental capacity before the recommended PDAs were put forward.
- 1.8 When assessing the land parcels adjoining the villages in the Borough, the Green Belt scores were similarly calculated, however, both the lower and higher scoring parcels were subsequently assessed against environmental and sustainability criteria before the PDAs were identified. If the high scoring parcels were removed from consideration, as occurred with the urban areas assessment, it would have meant a number of the villages could not have included a PDA. Whilst it is recognised that the Council may eventually recommend some villages do not incorporate PDAs, it was considered that to initially exclude villages from being able to accommodate a PDA as part of this Study, may conflict with subsequent spatial strategies identified

by the Council. The Green Belt purposes scores were however still recorded, and were given consideration, alongside sustainability and environmental matters, prior to identifying PDAs on the edge of villages.

- 1.9 The identification of PDAs within the Study reviews the current Green Belt boundaries, potential for realignment, and exclusion of areas in accordance with PPG2 and the NPPF. The identification of PDAs have principally been considered with regards to the introduction of residential development, however, this may not preclude other forms of development from taking place within them. Some of the larger PDAs will be expected to incorporate mixed use development, whilst some PDAs are located appropriately to sensibly accommodate commercial, employment or other forms of non-residential development. The type of development to be introduced will need to be assessed on a site by site basis, informed by the requirements for different land uses across the Borough, and local consultation.
- 1.10 The Study also refers to the implications of the National Planning Policy Framework (NPPF) with regards to the inseting and exclusion of villages from the Green Belt (refer to Volume IV).

Summary findings of Green Belt and 'Countryside beyond the Green Belt' within the surroundings of urban areas at Guildford, Ash and Tongham (Vol II)

- 1.11 The Study has demonstrated that there are a number of areas that provide opportunities for development within the surroundings of urban areas at Guildford, Ash and Tongham. A total number of 16 PDAs have been identified on the periphery of urban areas with a total estimated development capacity of 9,800 dwellings (refer to Volume I, Appendix II and Volume II, Section 8).
- 1.12 Land parcels K2, K5, K6, K7, K8 and K9 located within the surroundings of Ash and Tongham include PDAs located within the 'Countryside beyond the Green Belt' designation. As such, appropriate development ought to be explored within these PDAs prior to those located within the Green Belt across the Borough.
- 1.13 Land parcels E1, E22, E23, and H1 to the south of Guildford are located within, or partly within, the Surrey Hills AONB. As advised in PPS7, and now the NPPF, major development should not take place within the AONB, except in 'exceptional circumstances'. Proposals for major developments in the AONB would be subject to the most rigorous examination, and it would be expected that all land outside of the

AONB has been carefully assessed for development potential before major development takes place within it.

- 1.14 The Study has shown that there is potential to support the role of the Green Belt through a spatial strategy and co-ordination of development, through limited alterations of the Green Belt boundary at the following locations:

1.15 <i>Guildford (North)</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
A1, A4 and J3	Land parcels A1, A4 and J3 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the north of Stoughton and Bellfields, enclosed by moderate treecover to the north of Salt Box Road near Whitmoor Common (A4); continuous with residential properties near Juniper Close and Palm Grove (A1); and contained by Worplesdon Road, Keel's Close, and Tangle Lane near Pitch Place (J3). These PDAs are, however, located at least partly within the 0-400 metre buffer of the designated Thames Basin Heath SPA at Whitmoor Common. The PDAs may not therefore be suitable for residential development in their entirety although the land might be developed for an alternative land use. Nevertheless, the estimated development capacity for residential development has been calculated for these PDAs, should these constraints change over the development plan period or beyond. Ecology is a significant constraint that would need to be addressed with respect to any proposed development or land use within these PDAs.

1.16 <i>Guildford (East)</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
C1, C2 and E1	Land parcels C1, C2 and E1 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the east of Burpham and

	<p>Merrow, enclosed by the A3, Frithy's Wood and residential properties on Merrow Lane (C2); contained by Cotts Wood, the railway line and Merrow Common (C1); and continuous with residential properties following Abbot's Way and Trodd's Lane near Merrow Downs, within the newly constructed golf course (E1). The PDAs are generally enclosed by woodland and hedgerow treecover, rising topography, principal highways and railway infrastructure. Land parcels C1 and C2 are located directly to the west of Frithy's and Cott's Wood Site of Nature Conservation Importance (SNCI). Land parcel C1 is located to the north of Registered Common Land at Merrow Common and to the north west of Clandon Park Registered Park and Gardens. Land parcel E1 is partly located within the Surrey Hills AONB, directly to the north of Merrow Downs Registered Common Land, and to the south of Clandon Park Registered Park and Gardens. Any development within Land parcel E1 would therefore need to carefully consider the landscape and visual effects on the Surrey Hills AONB, and development within this designation should only be brought forward if no other suitable areas outside the AONB can be developed.</p>
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<p>1.17 <i>Guildford (South)</i></p>	
<p><i>Land Parcel</i></p>	<p><i>Potential Development Areas</i></p>
<p>E22 and E23</p>	<p>Land parcels E22 and E23 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the south of Merrow, continuous with residential properties on Downside Road, Little Warren Close and One Tree Hill Road (E22); and between residential properties on Pewley Way, Lancaster Avenue, Warren Road and One Tree Hill Road (E23). Land parcels E22 and E23 are located on steeply rising topography within the Surrey Hills AONB. Consequently, any significant form of development would be considered 'major development' and would need to demonstrate an 'exceptional circumstance', such as no other suitable sites being available outside the AONB designation (PPS7/NPPF).</p>



1.18 Guildford (West)	
<i>Land Parcel</i>	<i>Potential Development Areas</i>
H1 and H2	<p>Land parcels H1 and H2 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the west of Onslow Village, enclosed by the A3 Guildford and Godalming Bypass, Manor Copse and the rising topography of the Hog's Back ridgeline (H1); and contained by the railway line, Wildfield Copse and hedgerow treecover near Blackwell Farm (H2). Land parcel H1 is situated within close proximity of an existing and ongoing development area located at Onslow Village. Land parcel H1 is located within the Surrey Hills AGLV and partly within the AONB following the Hogs Back ridgeline to the south. Any residential development within this PDA would need to carefully consider the landscape and visual effects on the Surrey Hills AONB, and the element within the AONB should only be brought forward in exceptional circumstances. Land parcel H2 is relatively unconstrained, however, located directly to the west of Ancient Woodland at Strawberry Grove and Manor Copse. There is an opportunity to adopt a phased approach to potential development within land parcels H1 and H2 if both are brought forward.</p>

1.19 Tongham and Ash (including Ash Green)	
<i>Land Parcel</i>	<i>Potential Development Areas</i>
K2, K5, K6, K7, K8 and K9	<p>Land parcels K2, K5, K6, K7, K8 and K9 provide opportunities to accommodate appropriate development within the designated 'Countryside beyond the Green Belt' located outside of the Green Belt designation. As such, in accordance with PPG2, and now the NPPF, potential development ought to be explored within these PDAs prior to those located within the Green Belt.</p>

PDA's have been identified to the east of Ash, continuous with residential properties following the A323 Guildford Road, Harper's Road, and Ash Green Road surrounding Ash Manor (K9); continuous with residential properties on The Briars, South Lane, Grange Road and the dismantled railway line (K8); and between Ash Lodge Drive, the dismantled railway line and Manor Road near Ash Manor School (K7). The PDA's are generally enclosed by moderate tree cover following Harpers Road, Foreman Road, Ash Green Road and the dismantled railway line. Areas of High Archaeological Potential are located within land parcels K8 and K9. A designated SNCI is currently located within land parcel K7. Ecology and archaeology are therefore potential constraints that would need to be addressed with respect to any proposed development or other land use within land parcels K7, K8 and K9.

PDA's have also been identified to the south of Tongham, continuous with residential properties on The Street, Grange Road and Garbetts Way (K2); between the dismantled railway line, Northside and Poyle Road (K5); and within enclosed areas of Ash Green including White Lane and Hazel Road to the south, and Drovers Way to the north (K6). The PDA's are generally enclosed by moderate tree cover following the dismantled railway and by woodland to the north of Ash Green. The Surrey Hills AGLV is located to the south of Poyles Road and the AONB is located approximately 0.6km to the south, covering the Hogs Back ridgeline within land parcel K3.

Land parcels K1, K4 and K10 are located within the Blackwater Valley between the urban areas Tongham, Ash, Aldershot and Farnborough. This landscape corridor forms a break between the urban areas, currently protected under the 'Blackwater Valley Strategic Gap' local plan designation. Whilst open ground within this landscape corridor would benefit from future protection through local plan policy (scoring 4-3-4 respectively), the provision of defensible Green Belt boundaries in accordance with PPG2 would be difficult to obtain whilst appearing consistent with Green Belt boundaries within the adjoining Boroughs to the west. Land uses within the strategic gap, including designated flood risk areas and public open space, generally precludes development within these land parcels in any case. Therefore it is recommended that the

	<p>Blackwater Valley Strategic Gap be protected by future local plan policies rather than additional Green Belt.</p> <p>Additional Green Belt could be extended northward over land parcel K3 and part of K5 to prevent any south eastward encroachment into the rural landscape and the coalescence of Tongham and Ash Green, within the visual context of the Surrey Hills AONB. The majority of land parcel K5 between the dismantled railway, White Lane, Poyle Road and Northside is considered to prevent coalescence between Tongham and Ash Green. An exception to this is an area between the dismantled railway, Bin Wood and residential properties on Northside to the east of Tongham. This broadly 'triangular' area of land is well contained by hedgerows and potential development would not likely cause incursion into the wider land parcel. The dismantled railway with moderate treecover would form a strong defensible boundary (as advised by PPG2 and the NPPF) to the PDAs located to the south-east of Ash (land parcels K7 and K8).</p>
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*Sustainability Credentials and Estimated Residential Development Capacity of PDAs surrounding the Urban Areas of Guildford, Ash and Tongham*

1.20 In accordance with the methodology outlined within Volume II, Section 7, the sustainability credentials and estimated residential development capacity of all the identified PDAs within the surroundings of urban areas have been determined. In summary, the PDAs exhibit the following sustainability credentials and estimated residential development capacities within Table 1.

1.21 Table 1: Sustainability credentials and estimated residential development capacity for PDAs surrounding the urban areas of Guildford, Ash and Tongham:

Land Parcel	Urban Area	Sustainability Score	Sustainability Ranking	Estimated Residential Development Capacity
A1***	Guildford (North)	10.43	5	85
A4***	Guildford (North)	6.71	15	195

B6*	Guildford (North)	12.14	3	0
C1	Guildford (North East)	11.00	4	840
C2	Guildford (North East)	8.29	11	791
E1	Guildford (East)	5.57	19	1013
E21*	Guildford (East)	8.14	12	0
E22**	Guildford (South East)	5.86	18	971
E23**	Guildford (South East)	9.86	6	856
E24*	Guildford (South)	6.14	17	0
H1**	Guildford (South West)	7.43	14	738
H2	Guildford (South West)	6.29	16	1196
J2*	Guildford (North West)	8.86	8	0
J3***	Guildford (North West)	7.71	13	235
K2	Tongham (South)	8.71	9	555
K5	Tongham (East)	8.43	10	255

K6	Ash Green (North and South)	4.00	20	162
K7	Ash (South East)	12.43	1	685
K8	Ash (East)	9.86	6	425
K9	Ash (East)	12.43	1	798

*Note: \* indicates PDA within Local Plan (LP) exhibited environmental constraints with no residential development capacity. \*\*indicates PDA within LP is partly constrained by the Surrey Hills AONB. \*\*\*indicates PDA within LP is constrained by the Thames Basin Heath SPA 0-400 metre buffer.*

- 1.22 For clarification, the above 20 land parcels were identified for the sustainability assessment within Stage 3 due to them contributing least to the purposes of the Green Belt (scoring 0-2 points) within Stage 2. Of the 20 land parcels carried forward, 4 land parcels were constrained in environmental capacity terms (Stage 4) meaning that no PDAs have been identified within them. Therefore, the sustainability rankings for urban areas includes all 20 land parcels, however, only 16 of these include PDAs identified for appropriate development (refer to Volume II, Section 7).

Summary findings of Green Belt land surrounding villages across the Borough (Vol III)

- 1.23 The Study has demonstrated that there are a number of areas which provide opportunities to appropriately accommodate development within the surroundings of certain villages across the Borough. A total number of 41 PDAs have been identified on the periphery of villages with a total estimated development capacity of 4,876 dwellings (refer to Volume I, Appendix II and Volume III, Section 11). PDAs have been identified within the surroundings of certain villages, although some villages do not offer such potential, with no PDAs being identified. The summary findings are as follows:

1.24 <i>Chilworth</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
E51 and E52	<p>Land parcels E51 and E52 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. A PDA (E52-A) has been identified to the east of Chilworth, continuous with residential properties on the A248 Dorking Road near Chilworth Rail Station and School. E52-A is generally contained by woodland at Tillingbourne and the rising escarpment of St. Martha's Hill to the north, with Tangley Hill and Rosemary Hill to the south. A PDA (E51-B) has also been identified to the west of Chilworth, continuous with residential properties on the A248 New Road and Hornhatch Lane (E51-B) near Tillingbourne School. E51-B is generally contained by mature treecover at Wonersh Common to the south, Shalford Common and Bradstone Brook to the west. E52-A is located directly to the south of a Scheduled Monument, and approximately 0.2km to the south and north of the designated Surrey Hills AONB. E51-B is located approximately 0.3km to the south of the designated Surrey Hills AONB, approximately 0.8km to the north-east of Chinhurst Hill Local Nature Reserve and Ancient Woodland, and 0.2km to the east of Registered Common Land at Shalford Common.</p>

1.25 <i>East Clandon</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
D2, D3, D4, E2 and E3	<p>Land parcels D2, D3, D4, E2 and E3 within the surroundings of East Clandon do not exhibit potential for notable development, with no PDAs identified. East Clandon is generally contained by moderately rising topography to the south, hedgerows, treebelts and Clandon Regis Golf Course to the west, and Hatchlands Park Registered Park and Gardens to the east. East Clandon is mostly designated as a Conservation Area with</p>

	<p>an Area of High Archaeological Potential located within the village centre. The designated Historic Park and Gardens of Hatchlands Park are located directly to the east of the village. The Surrey Hills AGLV and AONB are located to the south of the A246 Epsom Road on the rising escarpment of Albury Downs.</p>
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1.26 <i>East Horsley and West Horsley (North)</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
C14	<p>Land parcel C14 provides opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the north west of East Horsley and West Horsley (North), continuous with residential properties on Ockham Road North and Nightingale Avenue (C14-A); between residential properties on Long Reach, Green Lane and Horsley Campsite (C14-B); within the surroundings of Manor Farm near East Lane (C14-C); and enclosed by Lollesworth Wood, the railway line, Lollesworth Lane and East Lane (C14-D). These PDAs are generally contained by moderate treecover and undulating topography. C14-A is partly constrained by a designated flood risk area and C14-D is located directly to the north of Lollesworth Wood SNCI.</p>

1.27 <i>Effingham</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
D10 and E9	<p>Land parcel D10 and E9 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. A PDA (D10-A) has been identified to the north of Effingham, continuous with residential properties on Effingham Common Road, Lower Road and Water Lane as well as St. Lawrence Primary</p>

	<p>School and Effingham Church. D10-A is enclosed with mature treebelts to the west, with Thornet Wood surrounding D10-A to the north. A PDA (E9-B) has also been identified to the south of Effingham, continuous with residential properties on Strathcona Avenue and Beech Avenue. The PDA is located on the lower rising escarpment of White Hill, enclosed by a defined hedgerow or treebelt between Woodlands Road and Beech Avenue. D10-A is located directly to the south of Thornet Wood Ancient Woodland and directly to the north of Effingham Conservation Area. E9-B is located to the east of an SNCI and Grassland Inventory Site at Effingham Golf Course.</p>
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<p>1.28 <i>Fairlands</i></p>	
<p><i>Land Parcels</i></p>	<p><i>Potential Development Areas</i></p>
<p>H8</p>	<p>Land parcel H8 provides opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the west of Fairlands, enclosed by moderate treecover at Littlefield Common adjacent to residential properties on Quaker's Way, Gumbrell's Close and Envis Way (H8-A); between residential properties on Envis Way and hedgerows to the south of Littlefield Manor Riding School (H8-B); and also between residential properties on Envis Way and hedgerows to the north of Hook Farm (H8-C). The PDAs are generally enclosed by woodland at Littlefield Common to the north, hedgerows and woodland near Littlefield Manor and Round Hill to the west, and mature treecover following a farm track to the south. H8-A is located directly to the south of Registered Common Land and an SNCI at Littlefield Common. H8-C is located to the west of Registered Common Land and an SNCI at Rydeshill. If all of the PDAs are to be allocated, a sequential, staged approach to development would be recommended with H8-A at Phase 1, H8-B at Phase 2, and H8-C at Phase 3.</p>



1.29 <i>Flexford</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
H10, H11, H12, and H15	Land parcels H10, H11, H12, and H15 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the north of the railway line, between Westwood Lane, Pussey's Copse and Glazier's Lane (H12-C); and between residential properties on Glazier's Lane and Strawberry Farm (H10-B). PDAs have also been identified to the south of the railway line, continuous with residential properties on Beech Lane, Westwood Lane and Green Lane East (H15-A); and between The Paddocks and West Flexford Lane (H11-D). The PDAs are generally enclosed by undulating topography, mature woodland and hedgerow treecover. H15-A is located to the north of Ancient Woodland and the SNCI at Wanborough Wood and at Highfield Copse to the west of Flexford. H10-B is located to the north of H11-D, located within an SNCI to the east of The Paddocks residential area. Ecology is therefore a significant constraint that would need to be addressed with respect to any proposed development within H11-D.

1.30 <i>Jacobs Well</i>	
<i>Land Parcels</i>	<i>Potential Development Areas (None Identified)</i>
B1, B2, B3 and B4	Land parcels B1, B2, B3 and B4 within the surroundings of Jacobs Well do not offer potential for notable development, with no PDAs identified. Jacobs Well is contained by rising ground, a ridgeline and Whitmoor Common to the north, parkland at Sutton Place to the north east, flood risk areas associated with the river Wey floodplain to the east, Slyfield Industrial Estate to the south, with the A320 and Stringer's Common to the west. Registered Common Land, an SSSI, SPA, SAC and a Local Nature Reserve at Whitmoor and Stringer's Common limits residential

	development to the north and west of Jacobs Well. Residential development to the east and south of the village is constrained by the River Wey, Burpham Court Farm Park and Slyfield Industrial Estate.
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1.31 <i>Normandy</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
J16, H12 and H16	Land parcels J16, H12 and H16 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the east of Normandy, continuous with residential properties on Anchor Close (J16-A) and Guildford Road (J16-B) contained by moderate treecover to the north of the A323 at Anchor Copse and Normandy Common. PDAs have been identified to the west of Normandy, continuous with residential properties on Westward Lane and Guildford Road near Normandy Church (H12-C); and enclosed by Guildford Road, Westward Lane and Walden Cottages (H16-D). The PDAs are generally contained by hedgerows between Westward Lane and Glaziers Lane and woodland between Great Westwood and Wyke. The PDAs are located within 1km of the designated Thames Basin Heath SPA, SSSI and candidate SAC at Wyke Common and Cleygate Common to the north of Normandy. Any development would therefore need to consider ecological mitigation and compensatory measures. J16-A and J16-B are also located directly to the south of Anchor Copse SNCI. PDA D is located directly to the south of an SNCI to the west of Wyke Primary School.

1.32 <i>Ockham</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
C18	Land parcel C18 provides an opportunity to accommodate appropriate

	<p>development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the north of Ockham, continuous with residential properties on Ockham Lane and Chestnut Farm (C18-A); and between Ockham Lane and Appstree Farm (C18-B). The PDAs are generally enclosed by a local ridgeline between Ockham Lane and Hyde Lane and mature treebelts following field boundaries between Chestnut Farm and Appstree Farm. The PDAs are located directly to the north of the designated Ockham Conservation Area.</p>
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1.33 <i>Peasmarsh</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
F3	<p>Land parcel F3 provides an opportunity to accommodate appropriate development without significantly compromising the purposes of the Green Belt. A PDA (F3-A) has been identified to the south of Peasmarsh, continuous with commercial properties on the Riverway Industrial Estate to the north, a residential property on Titham's Corner Road to the south, and the A3100 Old Portsmouth Road to the west. F3-A is generally contained by woodland on the boundary of the Riverway Industrial Estate to the north, mature treecover and scrub near the river Wey to the east, and the A3100 to the west. The PDA is located to the west of the Peasmarsh SSSI on the opposite bank of the river Wey and approximately 0.8km to the south west of the designated Surrey Hills AONB.</p>

1.34 <i>Pirbright</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
J7	<p>Land parcel J7 provides opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the east of Pirbright, continuous with</p>

	<p>residential properties on The Green enclosed by moderate treecover to the south (J7-A); and Chapel Lane enclosed by moderate treecover near Pirbright Common (J7-B). These PDAs are generally enclosed by woodland associated with Pirbright Common and Brookwood Cemetery. J7-A is located directly to the south east of Pirbright Conservation Area. J7-B is located within 0-400 metres of the designated Thames Basin Heath SPA, SSSI and candidate SAC. PDA B may not therefore be suitable for residential development, although the estimated development capacity for residential development has been calculated for this area should these constraints change over the development plan period. Ecology is a significant constraint that would need to be addressed with respect to any proposed residential development or other proposed land use within J7-B.</p>
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1.35 <i>Ripley</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
B16	<p>Land parcel B16 provides an opportunity to accommodate appropriate development without significantly compromising the purposes of the Green Belt. A PDA (B16-A) has been identified to the west of Ripley, continuous with residential properties at Georgelands, Haynes Close and Milestone Close. The PDA is generally enclosed by mature treebelts following a ditch and Papercourt Lake to the west, with defined hedgerows following the B2215 Portsmouth Road to the east. B16-A is located approximately 0.4km to the east of Papercourt lake Site of Special Scientific Interest (SSSI).</p>

1.36 <i>Send</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
B16 and B10	<p>Land parcels B16 and B10 provide opportunities to accommodate</p>

	<p>appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the north of Send, continuous with residential properties on Tannery Lane, Send Road, Walnut Tree Place and Maysfield Road (B16-A); and between Sanger Drive, Wharf Lane and Oat Lane (B16-C). Another PDA (B10-B) has been identified on Send Hill to the south of the village on elevated ground enclosed by mature hedgerow treecover. PDA C is partly located within 'The River Wey Corridor' (Local Plan Policy G11) which states that any development will only be permitted where <i>'it protects or improves the special character of the River Wey and the Guildford and Godalming Navigations'</i>. Any development within B16-C would therefore need to consider the visual setting, amenities, ecological value, and historic interest of this local plan designation.</p>
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<p>1.37 <i>Send Marsh and Burntcommon</i></p>	
<p><i>Land Parcels</i></p>	<p><i>Potential Development Areas</i></p>
<p>B13, B15 and B16</p>	<p>Land parcels B13, B15 and B16 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the north of Send Marsh, continuous with residential properties on Send Marsh Road, Danesfield and Polesden Lane (B16-A); between Polesden Lane and Manor Road (B16-B); and between Send Marsh Road, Green Drive, Meadow Drive and Tuckey Grove (B15-C). These PDAs are generally enclosed by mature treebelts and hedgerows between Danesfield, Polesden Lane, Papercourt Lake and Broughton Hall. PDAs B16-A and B16-B are partly constrained by a designated flood risk area. B15-C is located approximately 0.2km to the north east of a designated Scheduled Monument near Broughton Hall. A PDA (B13-D) has also been identified to the south of Burntcommon near commercial premises between London Road, Clendon Road and the A3. B13-D is relatively unconstrained in environmental capacity terms.</p>

1.38 Shalford	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
E56	<p>Land parcel E56 provides an opportunity to accommodate appropriate development without significantly compromising the purposes of the Green Belt. A PDA (E56-A) has been identified to the south east of Shalford, continuous with residential properties on Chinhurst Lane. E56-A is located on the rising ground of Chinhurst Hill and framed by hedgerow treecover. E56-A is located within the Surrey Hills Area of Great Landscape Value (AGLV) and as such development <i>'should be consistent with the intention of protecting the distinctive landscape character of the area</i> (Local Plan Policy RE 6). E56-A is also located within the visual context of the Surrey Hills Area of Outstanding Natural Beauty (AONB), some 0.6km to the north east and 1.4km to the south west of the PDA. As a consequence, any development <i>'should not result in the loss of important views to or from the AONB'</i> (Para. 10.25, Local Plan Policy RE5).</p>

1.39 West Clandon (North and South)	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
C5 and D2	<p>Land parcels C5 and D2 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. A PDA (C5-C) is located to the north of West Clandon, continuous with residential properties on Green Lane, Clandon Road and Lime Grove. C5-C is generally enclosed by linear tree belts and moderate treecover on the boundaries of residential properties. PDAs are also located to the south of West Clandon, continuous with the residential areas on The Street near Clandon Railway Station and Meadowlands (D2-A); and between The Street, Meadowlands and Clandon Regis Golf Course (D2-B). PDAs A and B are generally enclosed by rising topography and moderate treecover. PDAs D2-A and D2-B are located to the east of West</p>

	Clandon Conservation Area and 0.4km to the east of Clandon Park Registered Park and Gardens, however, separated by treecover. PDAs D2-A and D2-B are marginally constrained by a designated flood risk area to the east.
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1.40 West Horsley (South)	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
D6, E4 and E5	<p>Land parcels D6, E4 and E5 provide opportunities to accommodate appropriate development without significantly compromising the purposes of the Green Belt. A PDA (D6-C) has been identified to the north of West Horsley (South) continuous with residential properties on Silkmore Lane, Fairwell Lane and Pincott Lane. D6-C is generally contained by a local undulation, hedgerows and railway infrastructure, however, is located to the north and east of West Horsley (South) Conservation Area and Hatchlands Park Registered Park and Gardens.</p> <p>Other PDAs have been identified on the junction of the A246 Epsom Road and Shere Road, continuous with residential properties on Shere Road (E5-A); and enclosed by Epsom Road, Wix Hill and Shere Road (E4-B). The PDAs are generally contained by rising topography and treecover at Hook Wood, The Sheepleas and Effingham Forest, together with boundary treecover on the A246 Epsom Road. The PDAs are located 0.4km to the east of Hatchlands Park Registered Park and Gardens, however are visually separated by treecover following the A246. The PDAs are located within the Surrey Hills Area of Great Landscape Value (AGLV), and as such development, <i>'should be consistent with the intention of protecting the distinctive landscape character of the area'</i> (Local Plan Policy RE 6). The PDAs are also located within the visual context of the Surrey Hills AONB located approximately 0.2km to the south. As a consequence, any development within the PDAs <i>'should not result in the loss of important views to or from the AONB.'</i> (Para. 10.25, Local Plan Policy RE5).</p>

1.41 <i>Wood Street Village</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
H7	Land parcel H7 provides an opportunity to accommodate appropriate development without significantly compromising the purposes of the Green Belt. PDAs have been identified to the south and west of Wood Street Village, continuous with residential properties on Frog Grove Lane and White Hart Lane (H7-A); and enclosed between White Hart Lane, Woodland Farm and Hook Farm (H7-B). The PDAs are generally enclosed by rising topography and treecover associated with Backside Common and Bushy Hill, designated as an SNCI and Registered Common Land. H7-A and H7-B are also located to the south and west of the designated Wood Street Village Conservation Area.

1.42 <i>Worplesdon</i>	
<i>Land Parcels</i>	<i>Potential Development Areas</i>
<i>None</i>	Land parcels within the surroundings of Worplesdon do not exhibit potential for notable development with no PDAs identified. Worplesdon is located on rising ground with moderate treecover associated with Rickford Common and Jordan Hill to the north, a rising escarpment and mixed woodland at Maryland to the east, with rolling topography and woodland between the village and Merrist Wood College to the west. Registered Common Land, an SSSI, SPA, SAC and a Local Nature Reserve at Rickford and Whitmoor Common limits development to the north and east of the village. A designated Conservation Area covers the majority of the village to the south and west.



*Sustainability Credentials and Estimated Residential Development Capacity of PDAs surrounding Villages across the Borough*

1.43 In accordance with the methodology outlined within Volume III, Section 10 the sustainability credentials and estimated residential development capacities of all the identified PDAs within the surroundings of villages across the Borough have been determined. In summary, the PDAs exhibit the following sustainability credentials and estimated residential development capacities within Table 2.

1.44 Table 2: Sustainability credentials and estimated residential development capacities for PDAs surrounding villages across the Borough:

PDA	Village	Sustainability Score	Sustainability Ranking	Estimated Residential Development Capacity
B10-B	Send	6	22	42
B13 - D	Send Marsh and Burntcommon	5.25	26	200
B15 - C	Send Marsh and Burntcommon	7	18	116
B16-A	Send	9.75	6	47
B16-A	Send Marsh and Burntcommon	6	22	47
B16 -A	Ripley	4	30	195
B16 - B	Send Marsh and Burntcommon	6	22	49
B16 - C	Send	7	18	128

C5 - C	West Clandon (North and South)	3	34	246
C14 - A	East Horsley and West Horsley (North)	3.75	32	114
C14 - B	East Horsley and West Horsley (North)	1	41	163
C14 - C	East Horsley and West Horsley (North)	5	27	135
C14 - D	East Horsley and West Horsley (North)	5	27	122
C18 - A	Ockham	2.75	37	39
C18 - B	Ockham	2.75	37	35
D2 - A	West Clandon (North and South)	10.5	3	154
D2 - B	West Clandon (North and South)	7	18	106
D6 - C	West Horsley (South)	2.25	40	184
D10 - A	Effingham	8.75	10	298
E4 - B	West Horsley (South)	7.25	16	56
E5 - A	West Horsley (South)	7.5	14	47
E4 - B	Effingham	7.25	16	113

E52 - A	Chilworth	10.75	2	103
E51 - B	Chilworth	9.75	6	94
E56-A	Shalford	8.25	13	174
F3 - A	Peasmarsh	8.5	12	128
J7 - A	Pirbright	12	1	20
J7 - B*	Pirbright	7.5	14	41
J16 - A	Normandy	7	18	25
J16 - B	Normandy	9.5	8	32
H7- A	Wood Street Village	2.75	37	88
H7 - B	Wood Street Village	3.25	33	94
H8 - A	Fairlands	8.75	10	270
H8 - B	Fairlands	4.5	29	248
H8 - C	Fairlands	10	5	255
H10 - B	Flexford	6	22	107
H11-D	Flexford	4	30	50
H12 - C	Flexford	3	34	279
H12 - C	Normandy	10.25	4	53
H15 - A	Flexford	3	34	114

H16 - D	Normandy	9.5	8	64
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Note: \*\*\*indicates that the PDA within the Land Parcel is constrained by the Thames Basin Heath SPA 0-400 metre buffer.

Summary Findings of Insetting of Villages and Defining New Green Belt boundaries in accordance with the National Planning Policy Framework (Vol IV)

1.45 The Study has demonstrated that a number of villages within Guildford Borough would be suitable or appropriate for insetting within the Green Belt designation, in accordance with the National Planning Policy Framework (NPPF). A total number of 16 villages of the 24 assessed have been identified as being suitable for insetting, as summarised within Table 3.

1.46 Table 3: Summary of the villages across Guildford Borough considered inappropriate/appropriate for insetting within the Green Belt:

Villages considered inappropriate for insetting and to remain 'washed over' by the Green Belt	Villages considered appropriate for insetting within the Green Belt
Albury Compton Holmbury St Mary Peaslake Pirbright Puttenham West Clandon (North and South) Worplesdon	Chilworth East Horsley and West Horsley (North) Effingham Fairlands Flexford Gomshall Jacobswell Normandy Peasmarsh Ripley Send Send Marsh and Burntcommon Shalford Shere West Horsley (South) Wood Street Village

1.47 In accordance with the methodology outlined within Volume IV, Section 13, the Study has addressed NPPF paragraph 86 which states that *'if it is necessary to prevent development in a village primarily because of the important contribution which the open character makes to the openness of the Green Belt, the village should be included within the Green Belt. If however, the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.'*

- 1.48 Through an objective review of the open character of villages, and the presence or absence of recognisable, permanent and defensible Green Belt boundaries, as described within the Volume IV methodology, the villages within Table 3 were identified as being either inappropriate or appropriate for inseting.

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## 2 INTRODUCTION

### Purpose of the Study

- 2.1 In March 2009 Pegasus Planning Group was instructed to undertake a Green Belt and Countryside Study of Guildford Borough on behalf of Guildford Borough Council. The purpose of the Study is to identify the most suitable and sustainable areas for the Borough's future housing and economic growth, if sufficient land cannot be identified within the existing urban areas or villages. It is intended that this Study forms part of the evidence base to inform the emerging Local Plan for Guildford Borough with respect to the locations of potential future development.
- 2.2 Due to the recognised limitations of the Study, eventual allocations for future development areas across Guildford Borough will need to be informed by a number of other documents and reports, decisions on spatial strategies and public consultations, in addition to this Study.

### Background

- 2.3 The majority of Guildford Borough falls within the Metropolitan Green Belt surrounding London. Outside of the urban areas of Guildford, Ash and Tongham, the Borough is designated as Green Belt or 'Countryside beyond the Green Belt'. The border to the west of the Borough is currently designated as lying within the Blackwater Valley, a strategic gap preventing the coalescence of the settlements within the valley. The southern part of the Borough generally falls within the Surrey Hills Area of Outstanding Natural Beauty (AONB).
- 2.4 Other environmentally sensitive areas include the Borough's 16 Sites of Special Scientific Interest (SSSI), 140 Sites of Nature Conservation Importance (SNCI), and the Thames Basin Heaths Special Protection Area (SPA). The Borough has a rich and varied architectural heritage with approximately 1,200 Listed Buildings and 38 Conservation Areas.
- 2.5 The Green Belt designation encircling the Guildford urban area has largely resisted the spread of development into the surrounding countryside. However, the town will not be able to continue to accommodate significant levels of further development in the future. Consideration is needed of how and where the Green Belt and 'Countryside beyond the Green Belt' boundaries around the urban areas and villages across the Borough should be altered.

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- 2.6 Green Belt reviews should be undertaken when preparing the Local Plan- a set of planning documents explaining how a Borough is expected to change and grow over the next 15 years. Guildford Borough Council is in the process of compiling their next Local Plan which covers the period to 2030 and intends to identify the most sustainable locations and ways for future development to take place.
- 2.7 The Local Plan : Strategy Document sets out where and when different areas of the Borough are likely to change over the next 15 years. The Strategy Document needs to take account of the housing and economic needs for the Borough, alongside environmental considerations. A revised Local Plan : Strategy public consultation document is expected to be issued in Autumn 2012.
- 2.8 A Strategic Housing Land Availability Assessment (SHLAA) and Economic Land Assessment (ELA) are also currently being compiled by Guildford Borough Council, which will identify where and how many suitable sites there are for housing and economic uses within the Borough. This will inform the Local Plan: Strategy and Local Plan : Delivery Documents to be produced in the future.
- 2.9 This Green Belt and Countryside Study will help inform the SHLAA and emerging Local Plan Strategy. It will do so by identifying those areas of the Green Belt or 'Countryside beyond the Green Belt' that would be most appropriate for future development, if sufficient sites cannot be identified within the existing urban areas and villages during the Local Plan period.

#### Scope of the Study

- 2.10 The key requirement of the Study was to:
- 'Provide a robust, independent assessment of Guildford Borough's Green Belt and 'Countryside beyond the Green Belt' with a view to potential release for development purposes in the longer-term, should this be necessary within the Guildford LDF plan period – 2006 – 2026 (and up to 2030), identifying realistic sustainable location(s) for green field release'*
- 2.11 Initially the Study focussed upon potential development at the edge of the main urban areas, as explained within Volume I, Section 6. In May 2011 Guildford Borough Council requested additional work be undertaken on the Study, in particular with reference to assessment of villages across the Borough. The Study has subsequently been set out in separate Volumes, with the initial investigation of the urban areas at Guildford, Ash and Tongham in Volume II with the subsequent assessment of villages in Volume III. Following the publication of the NPPF, a

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further Volume (IV) was instructed, relating to the inseting of villages from the Green Belt.

- 2.12 The Study was required to identify realistic sustainable location(s) for greenfield release until 2030, taking account of the purposes of Green Belt, as defined in PPG 2 and now the NPPF, plus agreed sustainability criteria and environmental capacity considerations. The environmental capacity considerations including the locations of relevant environmental designations across the Borough were correct at the time of writing within the relevant Volumes. For example, throughout the course of the Study between 2009 and 2013, the boundaries of the Sites of Nature Conservation Importance (SNCI) to the east of Tongham and Ash had been recommended for change, however, the Volume II Study was based on the original designation boundaries at the time of the assessment.
- 2.13 The Study, whilst making recommendations, is only intended as a strategic tool to assist Guildford Borough Council in making future decisions on the Green Belt and 'Countryside beyond the Green Belt' within the Borough. A number of factors, such as land availability, future housing and economic requirements, and spatial policy will inevitably impact upon whether the parcels of land identified within the Study will be required for future development and whether they will be available for such development. The Study's inclusion of a sustainability ranking system means that if some sites are not able to come forward for any reason, it is clear what the other options are, and the comparative appropriateness of such options.
- 2.14 The Study has been required due to the potential future housing and economic requirements for Guildford Borough. As a result, and in order to assess how Guildford Borough Council might react to such requirements, the Study includes an estimate of the number of dwellings that might be accommodated within the identified land parcels. Whilst this will provide a good overall estimate, it is recognised that specific local requirements or considerations regarding detailed layouts and land uses, which have not been assessed as part of this Study, may increase or decrease the appropriate number of dwellings that can sensibly be provided within individual PDAs.
- 2.15 The availability of the land was not considered in this Study, it is solely a capacity analysis based on the purposes of the Green Belt designation, current sustainability credentials and environmental constraints present.



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The Role of Pegasus Planning Group

- 2.16 Pegasus Planning Group has been appointed to undertake an impartial and objective review of the Green Belt and 'Countryside beyond the Green Belt' within Guildford Borough to identify PDAs which could accommodate sustainable development without compromising the purposes of the Green Belt. This process includes the consideration of the function of land with respect to achieving the purposes of the Green Belt, the sustainability of the location in relation to key facilities and services, and the environmental constraints present. The Study has been undertaken in conjunction with baseline information provided by Guildford Borough Council and in liaison with its planning officers.

Structure of the Study

- 2.17 This Study is structured as follows:

***Volume I***

- 2.18 Section 1 provides a Non-technical Summary of the Study.
- 2.19 Section 2 provides an Introduction, including an overview of the purpose and scope of the Study.
- 2.20 Section 3 provides a Review of Previous Green Belt Studies, and an evaluation of methodologies undertaken for other districts.
- 2.21 Section 4 provides a Planning Policy Review, and the planning context within which the Study has been undertaken.
- 2.22 Section 5 outlines the Role and Purpose of the Green Belt within Guildford Borough.
- 2.23 Section 6 outlines the Green Belt and Countryside Methodologies used for assessing land within the surroundings of urban areas and for villages across the Borough.

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***Volume II – Land surrounding the Urban Areas of Guildford, Ash and Tongham***

- 2.24 Section 7 details the Methodology for Assessing Green Belt and ‘Countryside beyond the Green Belt’ within the surroundings of Urban Areas at Guildford, Ash and Tongham.
- 2.25 Section 8 outlines the Study Findings for assessing Green Belt and Countryside beyond the Green Belt surrounding the Urban Areas of Guildford, Ash and Tongham.
- 2.26 Section 9 details the Conclusions for Volume II.

***Volume III – Land surrounding Villages across the Borough***

- 2.27 Section 10 details the Methodology for Assessing Green Belt Land surrounding Villages across the Borough.
- 2.28 Section 11 outlines the Study Findings for assessing Green Belt Land surrounding Villages across the Borough.
- 2.29 Section 12 details the Conclusions for Volume III.

***Volume IV – Insetting of villages from the Green Belt***

- 2.30 Section 13 details the Methodology for the Insetting of Villages and defining Green Belt boundaries within Guildford Borough.
- 2.31 Section 14 outlines the Study Findings for assessing the Insetting of Villages and defining Green Belt boundaries within Guildford Borough.
- 2.32 Section 15 details the Conclusions for Volume IV.

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### **3 REVIEW OF PREVIOUS GREEN BELT STUDIES**

#### Purpose of the Analysis

- 3.1 In the context of assimilating an evidence base to support the production of emerging Local Development Frameworks (LDFs), some local authorities across the country have commissioned Green Belt reviews. The purpose of these has generally been to identify where additional development could be accommodated without compromising the functionality of the Green Belt at their location; and for others, the purpose has been to review the validity of the Green Belt boundary in achieving the intended purpose of the designation to determine if additional areas of the surrounding countryside should be included within revised Green Belt boundaries. Some of these reviews are already complete and it is on a selection of these documents that the following methodology evaluation is based.
- 3.2 The purpose of conducting such a critique is to consider the validity and reliability of the methodologies used in these completed studies, with a view to assimilating the findings into the development of a robust and objective methodology for this Study of Guildford Borough's Green Belt and 'Countryside beyond the Green Belt'. Given the absence of any definitive guidance from central government standardising the process by which Green Belt reviews should be undertaken and the array of completed studies available, it is advantageous to consider their strengths and weaknesses in developing a methodology for this Study. There are undoubtedly procedures and processes previously utilised in Green Belt reviews which can be identified as measured and legitimate strategies, and conversely other techniques within which inconsistencies and unreliability can be identified.
- 3.3 As well as the consideration of previous Green Belt reviews in this evaluation, regard has also been given to the findings of the Strategic Green Belt Review commissioned by the South West Regional Assembly undertaken by Colin Buchanan in February 2006. This document comprises a review of the methodologies of three Green Belt reviews undertaken within Joint Study Areas (JSAs) of the south west region, and puts forward an independently developed methodology for Green Belt review to be used in the region to standardise the process. The findings of this review provide valuable insights into best practice procedures. The South East England Regional Assembly did not commission a similar strategic review.

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### Previous Green Belt Reviews

3.4 Four previous Green Belt Reviews commissioned by local authorities across England have been evaluated in this section. These studies are as follows:

- Merseyside Green Belt Study - December 2004 (White Young Green Planning)
- East Cambridgeshire District Green Belt Review - September 2005 (Liz Lake Associates/QuBE Planning)
- Purbeck District Green Belt Review - June 2006 (Purbeck District Council)
- Coventry Joint Green Belt Review - January 2009 (SSR Planning)

3.5 This is by no means an exhaustive list of all Green Belt reviews commissioned to date in England and as such this evaluation does not purport to be an all-encompassing review. Rather the studies chosen are considered to be a representative selection from various regions of the country, each produced by a different consultant or council, which in turn provides a variety of approaches for evaluation.

### Evaluation of Methodologies

3.6 Conceptually, the topic of Green Belt review in itself suggests a somewhat obviously logical approach: divide the Green Belt into manageable sectors of land and identify, in a consistent manner, whether or not each sector is fulfilling the definition of what the Green Belt designation was devised to do; if this is found to be in question, further, more detailed assessment of these sectors can be applied to determine if they should be released from the designation. The nature of the further assessment criteria will depend on the purpose of the review. Where the release of land for development purposes is being considered, it would be appropriate to apply tests of sustainability and environmental capacity to the sectors or land parcels to determine if development could be supported at these locations.

3.7 To be utilised as a robust and reliable evidence base upon which policy forming decisions will be based, and also to avoid confusion and ambiguity in the results, it will be necessary to conduct and record such an assessment in a systematic manner. Given that the nature of the subject matter under consideration is not empirical, this requires that some of the assessment will be qualitative in nature, which is more challenging to undertake on a directly comparable basis. This is why

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the careful consideration of methodology and approach is crucial in providing a valid and defensible Green Belt Study.

#### South West Regional Assembly Strategic Review

3.8 The main objective of this report was to assess the technical work on Green Belt Review already carried out in the JSAs of the region (Cheltenham/Gloucester; South East Dorset; and West of England) with a view to developing an optimal methodology for use across the region. The main conclusions stemming from this review can be said to represent what SWRA consider to be best practice guidance for such reviews.

3.9 As examples of good practice, the report reviewed the Cambridge Green Belt Review, which had undergone the EiP process, and the Nottingham-Derby Green Belt Review to establish optimal methodology. From this review, the report identifies the following as the main recommendations for best practice in undertaking a Green Belt review:

- The first step should always be to examine parts of the Green Belt against the five purposes of the designation set out in PPG2 and also within the NPPF. Within this step the review should identify the relative importance of each of the purposes and identify a 'ranking' criteria for each part of the Green Belt.
- This stage should also include consideration of countryside outside of the Green Belt to identify if these areas fulfil the Green Belt criteria and therefore if their inclusion/exclusion from Green Belt is justified. This step should be undertaken using the same method for each part of the Green Belt enabling consistent conclusions to be drawn about areas where purpose is fulfilled and Green Belt should remain; areas where Green Belt release may be justified; and areas where Green Belt designation should be applied.
- The second stage should be to establish the sustainability criteria to be used to assess those areas where it has been identified that the release of Green Belt may be suitable. These criteria should be consistently applicable to each Green Belt area under consideration. Development of the criteria should have regard to sustainability objectives in national and regional planning policy and guidance.
- The review further recommends that, in order to limit the magnitude of the sustainability assessment, those locations identified in the first stage as having

potential for Green Belt release but which are unlikely to be sustainable (e.g. not adjacent to major transport links or significant urban areas) are excluded before the information gathering for the sustainability assessment gets underway. The review highlights the need for this process to be robust and justifiable in its method, but does not give any further details on how this process for exclusion might be achieved.

- The review recommends that a database of environmental capacity information for all potential areas to be assessed is compiled as part of the sustainability assessment, and that this should consist not only of designated environmental sites and those with statutory protection but also aspects such as floodplain information, 'quality of life capital', landscape sensitivity and landscape character. It is also an advocate that prior to potential Green Belt release, the land is subject to a landscape assessment.
- Utilising the environmental capacity information, potential areas for release should be compared against the database to establish if the land has the capacity to accommodate development. The sustainability assessment criteria should then be applied to the areas of search potentially suitable for Green Belt release and unconstrained in environmental capacity terms.

3.10 In addition to the above procedure outlined in the report's analysis as best practice guidance, the review of the JSA Green Belt studies also identifies the following key points regarding the validity of the methodology:

- Explanation and robust justification for all methods of scoring and/or ranking used within the study must be provided. These should be as objective as possible.
- Methods of analysis and appraisal must be consistently applied across all areas under consideration.
- It is important to document all main conclusions and findings graphically as well as in written form to avoid potential misinterpretation.
- Specifically with respect to the five Green Belt purposes outlined in PPG2, it is important to explain how each of these has been defined in the assessment as some can be interpreted similarly.

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- If factors other than the five purposes are considered in the initial review of Green Belt function, their inclusion needs to be justified within the report.
  - The difference between what are referred to as ‘absolute’ and ‘partial’ constraints’ should be clearly explained.
  - The methodology should make clear how and at what stage landscape quality and character assessments have been factored into the assessment.
  - Sustainability criteria should form an important part of the review and the assessment of sustainability should be undertaken in a manner which allows comparative assessment between the various areas of Green Belt under consideration for release.
  - Reviews should include a comprehensive planning policy context section to set out the national and regional policy. It should also consider best practice, the purpose of the Green Belt designation and review the effectiveness of the Green Belt.

3.11 The findings of the SWRA Review reflects a ‘common sense’ approach to robust Green Belt assessment. The following studies are reviewed in the context of this general best practice guidance.

#### Purbeck District Green Belt Review

3.12 The purpose of this review was to identify whether or not the current South East Dorset Green Belt boundaries within Purbeck District and the proposed extension in the area meet the definition of Green Belt as outlined in the five purposes defined in PPG2, to inform the preparation of LDF documents.

3.13 The review provides an overview of PPG2 as well as a limited planning policy history for Purbeck District explaining the process by which the Green Belt extension has come to be recommended. A review of national, regional and sub-regional policy relating to Green Belt is also given which assists in understanding why establishing possible locations for Green Belt release is not given as the primary aim of the review.

3.14 The review focuses around the urban fringes of the main settlements within the Green Belt and the outer edges of the Green Belt for detailed review, without providing adequate justification for why the entirety of the existing Green Belt is not

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being reviewed for consistency regarding the five PPG2 purposes. This results in the review appearing somewhat bias in the locations it targets.

- 3.15 The review uses a traffic light system (green/yellow/red) for rating each sub-section (or land parcel) of Green Belt against fulfilling each of the purposes. The sub-section areas are large tracts of land and are only defined by virtue of which grid square they fall into on the mapping provided. It is not clear how the scoring system was applied (i.e. what were the criteria for meeting each of the purposes) or how the ratings for each sub-section were then compared against one another to identify the locations for further review whilst excluding others.
- 3.16 A qualitative review of whether or not each sub-section meets the objectives for Green Belt set out in PPG2, (note that these are different to the five defining purposes) is also included, although at the same time the review acknowledges that the designation of Green Belt is not made based on these objectives. It is not clear how this aspect of the review influenced the identification of the locations said to be suitable for further study.
- 3.17 For those locations put forward for further assessment based on the traffic light rating stage, recommendations are then made about including or excluding land from the current Green Belt alignment. Although environmental designations are mentioned in the qualitative analysis given for each location, they are not presented on maps to support the recommendations for Green Belt review, although the areas proposed for exclusion/inclusion are identified with mapping.
- 3.18 Overall, the analysis makes logical recommendations for Green Belt review in the urban fringe locations identified, however the review's shortcomings highlight the need for clearly explained stages throughout the process, well presented information and a method which can be identified and can be consistently applied.

#### Merseyside Green Belt Study

- 3.19 This study was a strategic, sub-regional review of the Merseyside Green Belt which covers six local authorities to identify the need for broad changes to the boundary to accommodate future development requirements. Before undertaking the review, the scope of the study also included identification of likely future land use requirements to establish if any additional land capacity in the Green Belt was necessary.



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- 3.20 The review provides detailed accounts of the joint-working and consultation undertaken with the relevant councils and other organisations, as well as a planning policy overview relating to the land availability situation in Merseyside and the Green Belt. This assists in the reader's understanding of the study, noting in particular that the purpose is to identify broad regions where a review of the Green Belt boundary may be appropriate, but does not actually identify new boundaries.
- 3.21 Whilst the precise steps taken in this review are not directly applicable to the type of review which is required by Guildford Borough, the document presents each stage of the review clearly and concisely, provides explanations for how the methodology evolved and illustrates the information used in the form of graphs and graphics to allow the reader to follow the conclusions made. The process the review utilises appears comprehensive and consistent across the authorities included within the study. Whilst the subject matter of the review is complex and has multiple contributing factors, the transparency of the process documented in the report demonstrates the importance of clear and detailed explanations in undertaking such a review.

#### East Cambridgeshire District Green Belt Review

- 3.22 The purpose of this study was to review the Cambridge Green Belt within the East Cambridgeshire District in light of the need for residential growth identified in the Cambridge sub-region. The brief was to identify whether or not any land outside of the Green Belt could be considered for inclusion within it, as well as to assess the existing boundaries, particularly with respect to urban fringe locations.
- 3.23 Information and sources utilised are well referenced and there is adequate mapping to illustrate the review process referred to in the report. The review also provides comprehensive background information on the Cambridge Green Belt and the findings of similar Green Belt reviews in neighbouring districts, as well as a full policy review at the national, regional and local levels which provides the reader with a sound knowledge base and rationale for progressing the study.
- 3.24 However, the methodology section of the report is succinct and fails to detail how each stage of the study leads into the next. Confusingly, the assessment criteria which were developed are not detailed in this section of the report but in a later chapter.

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- 3.25 Local landscape character areas were established through survey work and used to initially identify boundaries for discrete areas of land for further field assessment. These are then tested against criteria developed to assess whether the area meets the requirements of PPG2: this scope includes not just the five purposes, but the guidance regarding the nature of Green Belt boundaries, their proximity to built up areas, and guidance regarding avoiding the need for further assessment at the end of the plan period.
- 3.26 Such criteria which are used are discussed and further defined within the document and each land area is assessed qualitatively against a checklist of the criteria. It is not immediately clear where these results are recorded within the document, if the findings are directly comparable, and how they informed the final recommendations for each boundary.
- 3.27 Noticeably, the methodology does not include any assessment of the Green Belt areas against sustainability considerations or environmental constraints. The review gives the overall impression of being heavily based on landscape and national policy guidance considerations, with little regard being given to the potential practical application of the findings should the Council wish to use these as part of an evidence base in the identification of areas which could accommodate future growth in the district (i.e. sustainability considerations and environmental factors).
- 3.28 The use of local landscape character areas to initially identify the discrete areas of land within the Green Belt for further assessment is not fully justified in the document. This is notable as the criteria developed for testing the discrete areas includes specific reference to paragraph 2.9 of PPG2 which identifies that boundaries should be *'clearly defined using recognisable features'*, raising the question as to why this definition, and not one of landscape character, has not been used to identify the boundary of 'discrete areas' given that Green Belt purpose is not to protect landscape quality or type.
- 3.29 In summary, the critique of this review emphasises the need for a robust methodology which is clearly explained and justified, and which is developed to include a broad range of criteria in determining Green Belt suitability.

#### Coventry Joint Green Belt Review

- 3.30 This joint study was commissioned to inform the evidence base of four local authorities' Core Strategies, firstly identifying those parcels which contribute least to

the purposes of the Green Belt designation, and subsequently assessing those areas against physical and environmental constraints.

- 3.31 A comprehensive planning policy context at the national, regional and local level is provided within the report, as well as an overview of other relevant background documentation such as Strategic Flood Risk Assessments and Landscape Assessments. This provides a background to the study and provides the reader with a good knowledge base to understand the purpose and procedures of the study.
- 3.32 The study utilises a robust methodology approach which presents logical steps to the review in refining the candidate areas for further assessment. Firstly the study area is divided into small parcels of land to be assessed individually. The boundaries for this division are based on the 'clear boundaries' guidance given in PPG2 (paragraph 2.9) providing a robust justification for how the land has been divided up for assessment. A pragmatic approach to the assessment was then taken, in that where the initial identification of strong physical boundaries resulted in large parcels, these were further sub-divided, again using the guidance regarding defensible Green Belt boundaries, into parcels small enough for detailed assessment to take place. Each parcel is then tested against the five purposes of the Green Belt designation from PPG2 and the methodology identifies how the wording of each purpose had been interpreted and defined within the assessment. The scoring criteria used were also defined. This explains clearly the steps taken and allows the reader to understand the rationale behind the methodology.
- 3.33 Justification is provided for the thresholds used to take low scoring parcels through to the next stage of assessment, adding to the validity of the study and the understanding of the reader.
- 3.34 The next stage consisted of a review against primary and secondary (environmental) constraints including existing or proposed development, landscape assessment, and connectivity to the urban area. Justification is provided for why these elements have been chosen. It is notable that the constraints considered in the assessment are not exhaustive and do not convey to the reader whether or not further constraints have been considered and discounted from the eventual analysis. The inclusion of a range of factors in this stage of the assessment enhances its credibility and validity, although it is conspicuous that sustainability considerations are limited to the assessment regarding connectivity to urban areas.

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- 3.35 The report documents all the steps of the methodology, including input from the local authorities in focusing the study. A clear scoring sheet is developed for the assessment and the thresholds for achieving each score is defined. Detailed explanation is given of the potential scenarios which may arise during the scoring and how these would be approached. A clear methodology is developed for the landscape value assessment and standardised sheets developed and used for each parcel in this aspect of the review.
- 3.36 The assessment is somewhat qualitative in the evaluation of fulfilling the Green Belt purposes and some of the elements of the second phase of the assessment. This is considered unavoidable with reviews of this nature. Overall, the methodology is sound, semi-quantitative, progresses in a rational manner and is objective in approach. There are a substantial number of graphics and maps accompanying the report as well as appendices containing the completed assessment schedules, providing clear evidence of the process which was undertaken.
- 3.37 Critically, the review also recognises its own shortcomings, in terms of elements of environmental and sustainability considerations which were not included within the second stage of the assessment, and also acknowledges that issues such as availability and achievability have not been included in the study. This evaluation lends further credibility to the methodology and qualifies the findings appropriately. This provides confidence that the authors recognise the 'bigger picture' which the evidence is contributing towards.

#### Other Evidence

- 3.38 Calderdale Council in Yorkshire published a 'Comments and Feedback' document detailing the results of a consultation on their proposed Green Belt review methodology (March 2009). A large portion of the comments from both third party stakeholders and statutory consultees related to requests for clarification or further explanation of aspects of the methodology or of areas shown on maps. Again this emphasised the need for unambiguous and transparent recording at each stage of the assessment process. Other comments included suggestions for the review of other factors, such as accessibility or conservation (i.e. utilising the Green Belt designation for conservation purposes).

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## Conclusions

- 3.39 Evaluation of the above studies, together with consideration of the recommendations from the SWRA Strategic Review, indicates which elements of methodology can be considered successful with respect to undertaking a Green Belt study, as well as an indication of strategies to avoid that may cause confusion.
- 3.40 The studies reviewed are by no means all of those published. It is however evident that the methodology used within the Coventry Study most closely follows the recommendations of the SWRA Review, in terms of the importance of clarity of the report, and the stages undertaken within the assessment. Critically, moving on a step from the SWRA recommendations, the Coventry Study further introduces a robust and defensible method of dividing up Green Belt and adjacent land into parcels for assessment, using the defensible boundaries guidance for Green Belts within PPG2, which is now repeated in the NPPF. This allows for a detailed assessment of sensibly sized areas of land, any of which would form a new defensible boundary should they be recommended for inclusion or exclusion from the Green Belt.
- 3.41 Key to the development of an effective methodology has emerged the consideration of the extent to which the Green Belt designation is fulfilling its intended purpose, as per the definitions in PPG2, which are taken forward in the NPPF. Environmental constraints and sustainability considerations are also central to the further stages of the analysis, although the scope which such factors should cover is not definitively identified. It is, however, evident that where a broad range of these factors are not included within the assessment, this presents an obvious gap in the findings when considering the validity of the conclusions reached.
- 3.42 Fundamental to a sound methodology that provides robust, defensible conclusions about Green Belt release, is the clear and transparent identification of information used, and scoring methods and thresholds applied to each stage of the assessment. These need to be objective where possible and consistently applied to each area under assessment to allow for direct comparisons of each area at each stage of the review.
- 3.43 The reliability of the findings and the validity of the methodology are dependent on the review process being undertaken and documented to the extent that it is unambiguous to the reader what has occurred at each stage of the assessment.

- 3.44 An important point which has arisen from the critique of Green Belt review methodologies concerns the definition of the purposes of Green Belt, given within PPG2 and repeated in the NPPF. It is important to consider that Green Belt is a strategic planning tool designed to prevent coalescence and urban sprawl so as to protect the countryside and is not a designation aimed at protecting landscape or conservation value.
- 3.45 It should be recognised that the majority of Guildford Borough is located within the Green Belt. As such, in developing a methodology for assessing the Green Belt across the Borough, it should be recognised that the points of best practice emerging from the review of previous Green Belt studies may need to be adapted to suit these conditions.
- 3.46 The methodologies used for the Guildford Borough Green Belt and Countryside Study are contained within Volume I Section 5, Volume II Section 6 and Volume III Section 9. The development of these methodologies has emerged from best practice identified within previous Green Belt studies, with particular reference to the recommendations of the review undertaken by SWRA. Due to Volume IV, relating to the Insetting of villages, only being required and undertaken following the publication of the NPPF earlier this year, there are not relevant studies already in place to refer to.

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## **4 PLANNING POLICY REVIEW**

4.1 The Study has been undertaken within the context of the relevant national, regional and local planning policies and guidance.

4.2 During the course of compiling Volumes I and II of the Study, national guidance was provided in the form of Planning Policy Statements and Planning Policy Guidance Notes. However in March 2012 the National Planning Policy Framework was published, which replaced the PPSs and PPGs previously in place. Much of the content of the PPSs and PPGs has simply been transferred into the NPPF in a more concise form, and as a result those elements of national guidance that were considered to be of most relevance when commencing the Study, remains.

4.3 A review of the most relevant planning policies and guidance is included below:

### 4.4 National Planning Policy Framework (NPPF)

- At the heart of the NPPF is a presumption in favour of sustainable development, which is identified as consisting of three dimensions – an economic role, a social role and an environmental role. Paragraph 14 confirms that for plan making this means that Local Planning Authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
  - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or
  - Specific policies in the framework indicate development should be restricted.

4.5 The framework advises at paragraph 17 that there are 12 land use planning principles that should underpin both plan making and decision taking, these being that planning should;

- Be genuinely plan led.

- Be a creative exercise in finding ways to enhance and improve the places in which people live their lives.
- Practically drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.
- Secure high quality design and good amenity for all existing and future occupants.
- Take account of the different roles and character of different areas, promoting the vitality and main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.
- Support the transition to a low carbon future in a changing climate.
- Contribute to conserving and enhancing the natural environment and reducing pollution.
- Encourage the effective use of land.
- Promote mixed use developments.
- Conserve heritage assets in a manner appropriate to their significance.
- Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.
- Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

4.6 Paragraph 47 encourages Local Authorities to significantly boost the supply of housing, including using an evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. This includes identifying key sites which are critical to the delivery of the housing strategy over the plan period.



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- 4.7 Paragraph 52 comments that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of garden cities. Local Authorities need to consider whether such opportunities provide the best way of achieving sustainable development, and reference is made to whether it is appropriate to establish Green Belt around, or adjoining such new development.
- 4.8 Section 9 of the NPPF refers to the Green Belt. It confirms that the Green Belt serves five purposes, as within PPG2, these being;
- To check the unrestricted sprawl of large built up areas;
  - To prevent neighbouring towns merging into one another;
  - To assist in safeguarding the countryside from encroachment;
  - To preserve the setting and special character of historic towns; and
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.9 Paragraph 82 advises that new Green Belts should only be established in exceptional circumstances, for example when planning for large scale development such as new settlements or major urban extensions. If proposing a new Green Belt, the framework advises that Local Authorities should;
- Demonstrate why normal planning and development management policies would not be adequate;
  - Set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
  - Show what the consequences of the proposal would be for sustainable development;
  - Demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
  - Show how the Green Belt would meet other objectives of the framework.
- 4.10 Paragraph 83 confirms that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

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The Framework comments that, at that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that it should be capable of enduring beyond the planned period.

4.11 Paragraph 84 advises that when drawing up or reviewing Green Belt boundaries, Local Authorities should take account of the need to promote sustainable patterns of development.

4.12 With regards to defining Green Belt boundaries, paragraph 85 states that Local Authorities should;

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period;
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

4.13 Paragraph 86 of the framework relates to the inseting of villages and comments that;

‘If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as Conservation Area or normal development management policies, and the village should be excluded from the Green Belt.’

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- 4.14 Paragraph 99 advises that Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. Paragraph 100 goes on to add that development should be directed away from areas at highest risk, but where development is necessary making it safe without increasing flood risk elsewhere. Reference is also made to a sequential test being applied to ensure development is steered to the areas with the lowest probability of flooding.
- 4.15 At paragraph 115 the framework advises that great weight should be given to conserving landscape and scenic beauty in National Parks, The Broads and Areas of Outstanding Natural Beauty. It goes on to advise that planning permission should be refused for major developments in these areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of;
- The need for the development, including in terms of any national considerations and the impact of permitting it, or refusing it, upon the local economy;
  - The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
  - Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- 4.16 Reference is also made at Paragraph 118 to proposed development that is likely to have an adverse effect on a Site of Special Scientific Interest not normally being permitted and planning permission should be refused for development resulting in a loss or deterioration of irreplaceable habitats, including ancient woodland, unless the need for, and benefits of development in that location clearly outweigh the loss. The framework also advises that potential Special Protection Areas, possible Special Areas of Conservation and listed or proposed Ramsar sites should be given the same protection as European sites.
- 4.17 When commenting upon the historic environment, paragraph 132 advises that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be. It advises that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.
- 4.18 When commenting upon plan making, paragraph 156 refers to the Local Plan needing to set out strategic priorities for an area, including policies to deliver homes and jobs needed. The

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framework goes on to confirm that Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives and policies of the framework.

### **The Regional Spatial Strategy for the South East of England (SE Plan)**

- 4.19 The above plan sets out the Government's planning and transport policy for the South East of England region up to 2026. The plan is intended to provide a framework for determining planning applications, as well as for preparing local development documents. The Government published the final version of the plan in May 2009.
- 4.20 Whilst it is the Government's intention to abolish regional strategies through the passing of legislation, the SE Plan currently remains part of the development plan for Guildford. However where SE Plan policies conflict with the National Planning Policy Framework guidance, the latter document will carry overriding material weight.
- 4.21 The SE Plan identifies 22 regional hubs, intended as the focus for development and investment in the transport system, leading to an increase in the overall level of accessibility and supporting the urban focus of the spatial strategy. Guildford is identified as one of the regional hubs and is also identified as a centre for significant change. All major retail developments and other town centre uses of a large scale across the region are encouraged to locate within such centres.
- 4.22 The SE Plan area has been divided to include a number of sub-regional strategy areas. The vast majority of Guildford Borough, including Guildford itself, is located within the London Fringe sub-region, whilst the western most part of the Borough, including Ash and Tongham, lies within the Western Corridor Blackwater Valley sub-region. A small section of the south east of the Borough is defined as lying in the 'rest of Surrey' area, outside of any identified sub-region.
- 4.23 GBC issued a legal challenge to the SE Plan which resulted in the deletion of the Borough Housing requirement.
- 4.24 One of the specific challenges identified by the SE Plan within the London Fringe sub-region is how to maintain the regional role of the Metropolitan Green Belt in containing London and retaining the identity of existing towns in a densely settled area, while allowing for necessary urban extensions. Core Strategy policy LF1 includes the requirement to meet housing needs mainly within urban areas but, where this is not possible, by urban extensions involving selective or small scale reviews of the boundary of the Metropolitan Green Belt.

- 4.25 Policy LF5, relating to urban areas and regional hubs, advises that notwithstanding the imperative of encouraging new homes within existing urban areas, *‘at Guildford, a sustainable urban extension of 2,000 dwellings is likely to be required to meet the housing allocation. This should be located to the north east of the town and be brought forward in accordance with Policy SP5 Green Belts’*. The policy also notes that some expansion into the Green Belt may be required at Woking, and if this is likely to be significant it should focus on the area to the south of the town. The supporting text to Policy LF5 clarifies that any urban extension needs to be consistent with the principles of sustainable development and good design, and there being scope to improve inter-connectivity between the two towns.
- 4.26 Policy SP5 of the SE Plan recognises that in order to meet regional development needs in the most sustainable locations, some selective reviews of Green Belt boundaries will be required. The policy advises that land to the north east of Guildford is one such area for review. In advising upon the reviews, the policy states they should:
- ‘Satisfy national criteria for Green Belt releases, accord with the spatial strategy, and ensure that sufficient land is safeguarded to avoid the need for further review to meet development needs to at least 2030 . . . In undertaking this exercise the same annual rate of development as set out in table H1b of the strategy should be assumed for the years 2026 – 2030.’*
- 4.27 Table H1b refers to 422 homes coming forward each year, meaning a further 2,110 homes are required for the period 2026 – 2030, on top of the allocation of 8,440 to 2026. Whilst it is recognised that the housing figures within Policy LF5 and H1b no longer form part of the SE Plan following the Council’s successful legal challenge, they will contribute to the Council’s own consideration of required housing figures in compiling the emerging Local Plan.
- 4.28 The supporting text to Policy SP5 advises that, *‘reviews are termed ‘selective’ rather than ‘strategic’ as the direction of growth is known through work carried out on previous Structure Plan reviews’*. The below comments assess how the Surrey Structure Plan came to propose the NE of Guildford urban extension, which was in turn referred to by the SE Plan.
- 4.29 The supporting text also advises that if Green Belt land is lost, consideration should be given to whether additional land should be designated as Green Belt.

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Surrey Structure Plan

- 4.30 The Structure Plan was adopted in 2004, and is now replaced by the SE Plan. As a result the Structure Plan's policy content is no longer of significance, yet in the context of the Guildford Borough Green Belt and Countryside Study, the reasoning behind some of the policy content is of relevance.
- 4.31 To assist in the production of the Structure Plan the County Council produced a Technical Document entitled 'Technical Paper 2: Evaluation of Locations as New Communities'. This was a desk based study intended to identify possible locations to accommodate development if growth was needed beyond the existing urban areas across the County. The Paper gave brief consideration to all land adjoining urban areas initially before identifying a short list of ten locations for urban extensions, including four adjoining Guildford (NE, NW, SW, W), that were assessed in greater detail. The paper concluded that the identification of Guildford as a location for urban extensions was favourable in terms of social and economic benefits and would make the area more sustainable in the longer term. It commented that *'although four potential locations were identified, development of all at the same time would be impractical. It is considered that development in the NE and NW sectors could be brought forward more quickly than the other two locations'*.
- 4.32 As a result, the Draft Structure Plan included proposed urban extensions to the NE and NW of Guildford. Following consultation responses, including objections from English Nature due to the proximity to the potential Special Protection Area, the County proposed to remove the NW extension from the Structure Plan. The EiP Panel Report considered that the NE extension was marginally preferable to that at the NW due to better existing and potential transport links and less risk to nature conservation interests. The Panel therefore recommended the identification of the NE of Guildford as an area suitable for an urban extension to accommodate a new community, if one were needed.
- 4.33 The adopted Structure Plan sets out the Housing requirements at Policy LO6, advising that Guildford should provide for 4,750 dwellings for the period between 2001 and 2016. The policy goes on to add:

*'In Guildford provision for a new community to the north east of the town will be made in the local development framework if sufficient capacity on previously*

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*developed land cannot be identified to meet the full housing allocation within the LDF period'.*

- 4.34 This is clarified under Policy LO4, relating to Countryside and Green Belt issues, which states:

*'...At Guildford, the local development framework will include amendments to the Metropolitan Green Belt boundary north east of Guildford if the need for an urban extension to the town is confirmed.'*

#### Guildford Borough Local Plan

- 4.35 The Local Plan was adopted in January 2003, prior to the adoption of the Structure Plan referred to above. The Local Plan was intended to cover the period up to 2006. Whilst the majority of policies have been saved and continue to be used in the determination of planning applications, they will gradually be superseded by the emerging Local Plan.
- 4.36 The Local Plan refers to the required housing figures set out within the 1994 Structure Plan. This required the provision of 3,800 dwellings between 1991 and 2006. The Local Plan advised that such numbers could be accommodated within the existing urban areas of the Borough, without any requirement to alter the Green Belt boundaries to accommodate additional housing.
- 4.37 The Local Plan did include an amendment to the Green Belt boundary to the south west of Guildford in order to accommodate the expansion of the University of Surrey. Whilst Local Plan Policy U1, which relates to the University development designation, has since expired, the resulting amendment to the Green Belt boundary remains in place.

#### Guildford Emerging Local Plan

- 4.38 The emerging Local Plan will provide a set of documents that will explain and influence how the Borough is expected to grow and change until 2030. The Local Plan : Strategy document will set out the main, over-arching framework for the Local Plan, setting out where and when different parts of the Borough are likely to change in the future. This will be accompanied by a number of other documents, including a Site Allocations DPD, which will identify in more detail the specific sites to come forward for residential, employment, retail, leisure and transport uses.

- 4.39 It is understood that the Council intends to go out to public consultation with the Local Plan : Strategy document during 2013. This consultation document will propose a housing number for the Borough during the plan period, along with locations for growth and key strategic development sites.



## **5 ROLE AND PURPOSE OF THE GREEN BELT**

- 5.1 In the 1920s and 1930s concern began to be expressed regarding the outward sprawl of London. One of the responses to this concern was the London Home Counties (Green Belt) Act 1938, which led to the inclusion of a proposal for a Green Belt ring entirely surrounding London within the 1944 Greater London Plan. The Surrey Development Plan submitted in 1953 included a proposed Green Belt which corresponded to the concept set out in the Greater London Plan. Proposals in 1978 considered a Green Belt distance of approximately 19 – 24km to be sufficient to perform its role of containing the outward sprawl of London.
- 5.2 The detailed Green Belt boundaries relating to Guildford Borough were established in the 1987 Local Plan. As explained within Volume I, Section 4 an area of land at Manor Farm was removed from the Green Belt as part of the 2003 Local Plan, in order to accommodate the University of Surrey's expansion plans.
- 5.3 Whilst the initial intention behind the Metropolitan Green Belt was to restrict the urban sprawl of London, the application of associated policy now results in an inevitable significant impact upon future development associated with all towns and villages to be enclosed, or washed over, by the Green Belt designation. The adopted Local Plan sets out quite clearly within Policy RE2 that any new development will be restricted to a number of limited purposes, as set out in PPG2, and continued in the NPPF.
- 5.4 Strong resistance to the majority of development through local Green Belt policy and PPG2/NPPF guidance is very effective in helping to ensure the PPG2/NPPF defined purposes of maintaining land as Green Belt are achieved. It does however mean that the opportunities for growth are severely limited for towns such as Guildford, which possess built up areas totally enveloped by the Green Belt.
- 5.5 Substantial work will need to be undertaken through the SHLAA, ELA and associated DPDs in order to establish whether the required growth for the Borough can be accommodated within the built up areas. If this cannot be achieved, the Green Belt boundary will need to be redrawn, removing some areas from the current designation, in order to enable the required development to take place. This will ensure that the restrictive guidance and policies relating to Green Belt land continue to apply effectively across the parts of the Borough that remain subject to the Green Belt designation.

- 5.6 The purpose of Green Belt land within the Borough will continue to remain as it has been since initial designations, and now defined within the NPPF. However, in order to recognise Guildford's status and associated growth requirements, the Green Belt boundary may need to be redefined. This Study will help ensure that if a new boundary is required to accommodate additional development, it is amended in the most appropriate manner.

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## **6 GREEN BELT AND COUNTRYSIDE STUDY METHODOLOGIES**

6.1 This section of the Study introduces the methodologies used to identify the most suitable locations for sustainable development within the designated Green Belt and countryside across the Borough. The Study originally focused on the review of Green Belt and 'Countryside beyond the Green Belt' land within the surroundings of urban areas at Guildford, Ash and Tongham (Volume II). The finalisation of the Study was suspended in October 2009, however resumed in May 2011 to include land surrounding village settlements (Volume III). Following the release of the NPPF, a further Volume (IV) was instructed, relating to the Insetting of villages from the Green Belt.

6.2 Following a review of the Study methodology used in the initial assessment in October 2009, it was apparent that this would not be practical or appropriate for assessing land surrounding the villages, due to it excluding a number of the villages from further consideration. Separate methodologies for the assessment of urban areas and the villages have therefore been devised and are set out in Volume II, Section 7 and Volume III, Section 10 respectively.

6.3 There are considered to be a number of reasons why the separate methodologies are justified in this instance:

- Without them, a number of the villages, including those which score well in terms of sustainability, would not have been assessed, which could have resulted in sustainable options for growth not receiving proper consideration.
- The availability of facilities and services in village locations will inevitably differ to those on the edge of the main urban areas, so a modified sustainability scoring system is considered appropriate and efficient.
- Precise comparison between the expansion of one of the main urban areas and a village is not considered essential or even appropriate, due to them typically reflecting different scales and type of development opportunities. It is instead considered more important to be able to carefully compare and rank different urban area expansion sites against each other, or different village expansion sites against each other. The separate methodologies allow for this.
- Both methodologies incorporate proper consideration of Green Belt purposes, sustainability criteria and environmental constraints. As a result they both adhere to

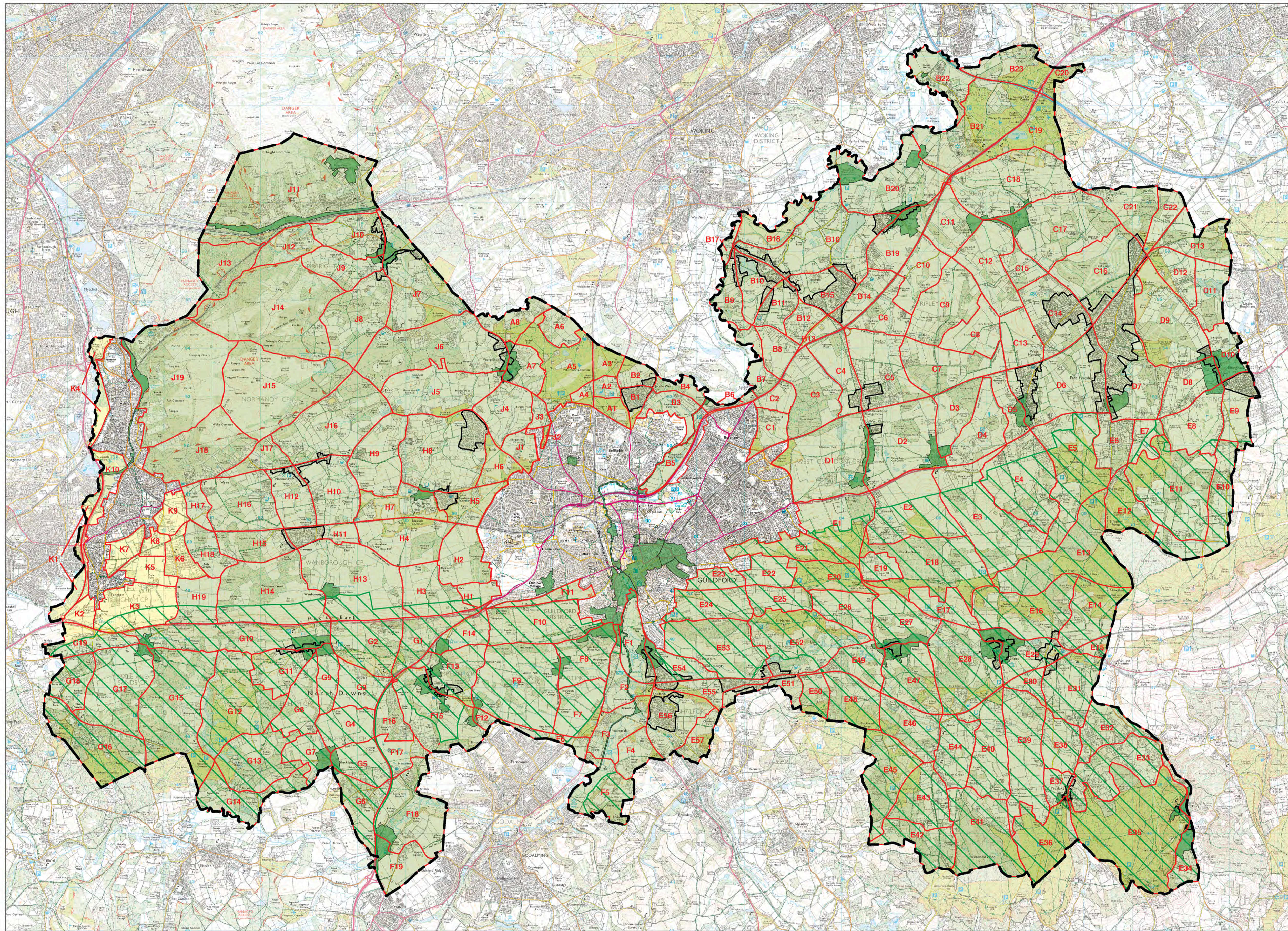
the brief of the Study and can enable the very general comparison of urban area sites against village sites subject to the required caution expressed above.

- 6.4 The Methodology relating to Volume IV is set out within the Volume itself, and evolves from the requirements of paragraph 86 of the NPPF, relating to the Insetting of Villages from the Green Belt.








**VOLUME I APPENDICES**

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**Appendix I: Land Parcels Plan**



**KEY**

-  Guildford Borough District Boundary
-  Settlement Boundary
-  Land Parcel Boundary
- A1** Land Parcel Reference Number
-  Green Belt
-  Countryside beyond the Green Belt
-  Surrey Hills Area of Outstanding Natural Beauty (AONB)
-  Conservation Area

Volume I - Appendix I  
 Guildford Borough  
 Green Belt and Countryside Study

**Land Parcels Plan**  
 Drawing Ref: **BNL.0287\_09-B**  
 Client : **Guildford Borough Council**

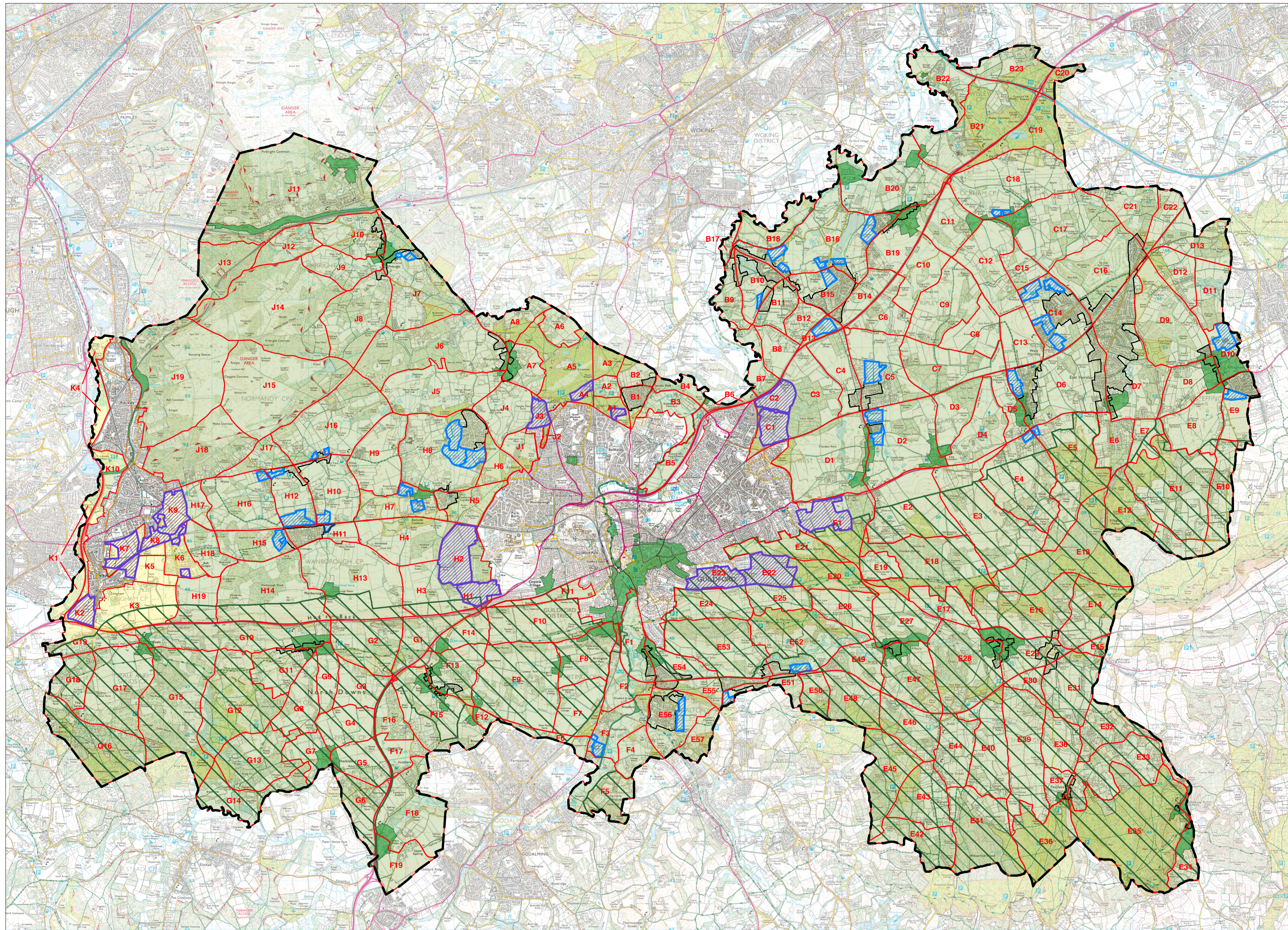
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 6th October 2011  
 Team AC/PC/AD/DP





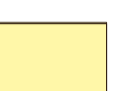






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**Appendix II: Potential Development Areas (PDAs) surrounding Urban Areas and Villages across the Borough**





- KEY**
-  Guildford Borough Boundary
  -  Settlement Boundary
  -  Land Parcel Boundary
  - A1** Land Parcel Reference Number
  -  Green Belt
  -  Countryside beyond the Green Belt
  -  Surrey Hills Area of Outstanding Natural Beauty (AONB)
  -  Conservation Area
  -  Potential Development Areas surrounding Urban Areas
  -  Potential Development Areas surrounding Villages

Volume I - Appendix II  
 Guildford Borough  
 Green Belt and Countryside Study  
**Potential Development Areas  
 surrounding Urban Areas and  
 Villages**

Drawing Ref: **BNL.0287\_12-E**  
 Client : **Guildford Borough Council**

1 : 40,000 @ A1  
 8th November 2011  
 Team AC/PC/AD/DP

