

GUILDFORD BOROUGH GREEN BELT AND COUNTRYSIDE STUDY

Volume II - Addendum

On behalf of Guildford Borough Council

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CONTENTS:

	Page No:
1. INTRODUCTION	1
2. GREEN BELT PURPOSES	2
3. URBAN EDGE LAND PARCELS	4
4. CONCLUSIONS	6

VOLUME II ADDENDUM APPENDICES

1. Green Belt Purposes Schedule
2. Guildford Borough Green Belt Purposes Sensitivity Plan
3. Environmental Capacity Analysis
4. Environmental Designation and Local Plan Policy Mapping
5. Sustainability Walking Distances for Land Parcels J1 and K3
6. Sustainability Assessment Scoring
7. Residential Capacity Calculations
8. Updated Potential Development Areas (PDAs) surrounding Urban Areas

1. INTRODUCTION

- 1.1 Work commenced on the Guildford Green Belt and Countryside Study in 2009. Volume II of the Study focused on land surrounding the urban areas of Guildford, Ash and Tongham, and involved the identification of Potential Development Areas (PDAs) to accommodate the required growth of the borough, if it was subsequently confirmed that such growth could not be accommodated within existing settlements. The Study, consisting of Volumes I – IV, was published by the Council in September 2013.
- 1.2 The Study was one of the background documents used to inform the Borough Council's Local Plan Strategy and Sites Issues and Options Document, published in October 2013. Many consultation responses were received on the document, some of which in turn referred to the Green Belt and Countryside Study undertaken. Partly in response to the level of interest expressed on the Issues and Options Document, and background Green Belt and Countryside Study, the Council arranged for a Scrutiny Committee meeting to be open to the public on 4th March 2014. At this committee meeting members of the public and interest groups discussed queries and concerns about the Study, with Officers and staff of Pegasus Group. Following this meeting, the Council instructed further work to be undertaken in connection with the Study, this addendum representing additional work on Volume II – *Land surrounding the Urban Areas of Guildford, Ash and Tongham*.
- 1.3 The addendum is intended as an addition to Volume II, rather than the replacement of it. However, its content will supersede some elements of the previously prepared Volume II, as will be made clear within the addendum.

2. GREEN BELT PURPOSES

- 2.1 As explained within Volumes I and II of the Study, one of the criteria used to assess whether land parcels around the edge of the main urban areas might be appropriate for development included the consideration of whether the land parcels served the Green Belt purposes, as set out in the NPPF.
- 2.2 The methodology for assessing whether the land parcels served such purposes are set out within Chapter 7 of Volume II of the Study. Comments received on such methodology through the consultation process warranted further consideration of the method used. It has subsequently been considered appropriate to alter the methodology for consideration of two of the Green Belt purposes, as explained below.

Safeguarding the Countryside from Encroachment

- 2.3 The initial Study proposed a methodology that required a land parcel to contain or directly adjoin notable development in order that encroachment could potentially occur from it. This resulted in land parcels that contained more than incidental countryside development being considered to serve this encroachment purpose, but undeveloped parcels not fulfilling this purpose and being scored accordingly.
- 2.4 Such an approach has been reviewed following feedback on the Study, and consideration has been given to a number of alternative Green Belt reviews that have been undertaken in recent times. On balance, it was considered an alternative approach was justified and would enable greater consistency with one of the essential characteristics of Green Belts, as referred to within the NPPF, this being their openness. As a result, this element of the methodology has been amended, as follows;

- *Purpose 3 – To assist in safeguarding the countryside from encroachment.*
- *In order to assess whether land parcels perform this purpose, consideration will be given to the extent to which the countryside within a parcel has already been built upon. If the parcel is strongly influenced by built development or urban influences, it will be assumed that this part of the countryside has already been notably encroached by development, and as a result is no longer able to perform this purpose. If however the parcel remains primarily free of development, possessing predominately unspoilt countryside / or uses defined as appropriate in the Green Belt, then it may be*

considered that encroachment has not yet occurred and the parcel continues to perform the purpose.

Preserving the Setting and Special Character of Historic Towns

2.5 The initial Study focussed attention upon the proximity and impact upon conservation areas, when assessing whether or not parcels were likely to serve this Green Belt purpose. Such an approach has been used in other Green Belt Studies, although it is recognised the stated purpose in the NPPF does refer to the setting and special character of historic towns, rather than just the setting and special character of conservation areas. For this reason, and given Guildford's recognised status as an historic town, it is considered that wider consideration should be given to assessing whether or not a land parcel serves the purpose. This element of the methodology has therefore been revised as follows;

- *Purpose 4 – To preserve the setting and special character of historic towns.*
- *Conservation areas associated with towns and villages within Guildford Borough are considered significant when assessing land parcels against this purpose. In addition, the potential impact upon the setting and special character of historic elements of Guildford, through cross reference to the Landscape Character Assessment (rural / urban fringe assessment 2007) and the likely impact upon Historic Parks and Gardens and Scheduled Monuments, will also be taken into account when assessing whether a parcel performs this purpose. Where a land parcel is considered to notably contribute to the preservation of such historic settings relating to settlements, it will be assumed to serve the purpose.*

2.6 Land parcels across the borough have therefore been reassessed to incorporate the revised methodology referred to above. During this process, some inconsistencies were found with regards to the assessment of other purposes being considered and have been updated accordingly. The Green Belt Purposes Schedule now attached at Appendix 1, therefore supersedes the schedule set out within Chapter 8 of Volume II. In connection with this, a Guildford Borough Green Belt Purposes Sensitivity Plan is included at Appendix 2.

3. URBAN EDGE LAND PARCELS

- 3.1 Volume II of the Study involved a sieve mechanism, whereby those parcels that were assessed as being the most sensitive against Green Belt purposes were not considered appropriate for development, and hence not assessed in terms of their environmental capacity to accommodate development or sustainability. Feedback on the Study included concern that this inappropriately focussed the attention towards some parcels, without wider consideration of others, when some aspects of the sensitivity assessment inevitably included a degree of subjectivity.
- 3.2 It was subsequently agreed that more detailed consideration should be given to all urban edge parcels. As a result, for those edge of urban area parcels with a clear connectivity to the existing urban edge boundaries, which were not previously considered beyond Green Belt purposes within Volume II, an Environmental Capacity Analysis has now been undertaken. This has been undertaken in accordance with the methodology set out within 7.46 to 7.50 of Volume II, subject to two additional categories referred to below.
- 3.3 If the Environmental Capacity Analysis has identified that there may be capacity to accommodate an urban expansion, then a sustainability assessment has been undertaken for the parcel in question. This has been undertaken against the same criteria as those previously used, as explained at 7.15 – 7.45 of Volume II. The associated walking distances plans are included at Appendix 5 and related sustainability scores at Appendix 6.
- 3.4 For those parcels that were not considered to have sufficient environmental capacity to accommodate an urban expansion, sustainability assessments were not undertaken.
- 3.5 Feedback to the Study also included suggestions as to how more issues could have been taken into account when compiling the Environmental Capacity Analysis. It is considered that the analysis undertaken was sound, but that some further information would be appropriate. As a result the Environmental Capacity Analysis undertaken within Volume II, and that undertaken in connection with the additional parcels referred to above, has been updated to include reference to the Council's Landscape Character Assessment, 2007 and the Agricultural Land Classifications, obtained from Natural England.
- 3.6 This additional information has informed recommendations with regards to Potential Development Areas, and is also considered helpful to the Council when

assessing the likely impact of such development. The Environmental Capacity Analysis for each urban edge parcel is included at Appendix 3. Appendix 4 includes the Environmental Designations and the Local Plan Policy maps for those new urban edge parcels to be considered.

- 3.7 Some representations made in response to the initial Study included the suggestion that parcels of land beyond those that directly adjoin the main urban edge of Guildford should be considered for Potential Development Areas. Volume II of the Study has focussed upon those parcels which directly adjoin the urban edge as they are likely to offer a more appropriate relationship with the main urban area than those parcels which are separate from it. It is recognised that if the Council do identify urban edge parcels as appropriate for development and removal from the Green Belt, this may offer the potential for some adjoining land parcels which do not currently connect with the urban edge to come forward in a more appropriate manner. However, such decisions will be best informed by the Council's chosen spatial strategy, and choices upon the recommended PDAs around the urban edge set out in Volume II and this Addendum. As a result such parcels have not been considered further in this Addendum, although the Green Belt Purposes Schedule at Appendix 1 does include comment upon all areas.

4. CONCLUSIONS

- 4.1 Following the publication of Volume II of the study, additional work has been undertaken with regards to the assessment of two of the Green Belt purposes, and additional landscape and agricultural input into the Environmental Capacity Analysis. Those parcels previously removed from consideration due to their Green Belt Purposes score in Volume II have been reconsidered in terms of environmental capacity, and if necessary sustainability. This has resulted in revised findings for the urban edge parcels as follows;

Removed PDAs

- 4.2 The initial Volume II identified some land within the AONB as Potential Development Areas. Whilst it was always the case, and referred to within the findings of Volume II, that such PDAs should only be allocated for development by the Council if the necessary exceptional circumstances were present, it now appears extremely likely that such exceptional circumstances will not exist. Since the preparation of Volume II, the Council have instructed the investigation of a number of areas beyond the main urban edges to accommodate the Council's growth requirements. The Council's Local Plan Strategy and Sites Issues and Options Document highlighted that there are many ways in which the Council may choose to accommodate the Borough's growth, and major development within the AONB was not included within those options.
- 4.3 As a result, whilst there was uncertainty as to whether exceptional circumstances would exist to justify major development in the AONB when Volume II was initially prepared, this is no longer the case. The previously identified PDAs that were located predominantly within the AONB have therefore been removed from the revised identification of PDAs at Appendix 8, these being at parcels E22 and E23.

Additional PDAs

- 4.4 Potential Development Areas are not identified within the Study purely on the sensitivity of associated parcels to the Green Belt purposes. For example, if a parcel is considered to be of low sensitivity in terms of the Green Belt purposes, but is primarily within an area that is liable to flood, it would not be appropriate to identify potential development within it. The Green Belt purposes sensitivity information can be used by the Council to guide development to the less sensitive areas, but will inevitably be influenced by other background information, including

the Council's chosen spatial strategy, confirmed growth requirements and how the Council interprets the requirement to meet their objectively assessed housing needs. For this reason, Potential Development Areas have been identified, and retained, within some mid and higher sensitivity parcels. This does not imply that all such areas should be allocated for development within the Council's subsequent Local Plan Document, but identifies those areas that might be appropriate if there is a need to introduce development to those more sensitive parts of the Green Belt in order to meet the Council's growth requirements.

4.5 In assessing additional parcels around the main urban edge it has become apparent that the vast majority that were not assessed against sustainability and environmental capacity previously, are unable to accommodate development due to inadequate environmental capacity. In particular, the AONB to the south of Guildford, floodplains to the north and south, and notable areas of common land to the north-west of Guildford and north-east of Ash, mean that the ability to introduce any significant scale of development to many of the newly assessed parcels does not exist.

4.6 New PDAs were however identified at the following parcels;

Land Parcel J1, Land at Liddington Hall Farm

4.7 The parcel adjoins the north-west edge of Guildford. It includes two roads supporting residential development towards its centre, and is partly contained by residential development on Sime Close, Findlay Drive and Gravetts Lane to the north, the latter of which also includes some commercial development. The parcel was highlighted as being potentially sensitive in terms of coalescence with Fairlands to the west. However, a strong area of woodland would be maintained between any development within the western part of the parcel and the eastern edge of Fairlands, meaning the visual connectivity between the two settlements could be limited appropriately.

4.8 Any proposed development would need to take account of the relationship with the common land at the southern corner of the parcel, and the impact upon the SNCI within it. The Green Belt boundary could be re-aligned to follow the line of Gravetts Lane to the north-west and Aldershot Road to the south-west, before entering the parcel to follow the line of the common land.

4.9 The PDA covers an area of approximately 28 ha, and could accommodate in the region of 625 dwellings. The PDA scored 8.57 against the sustainability

credentials and would therefore be ranked in the middle of those main urban edge parcels identified for PDAs, as indicated at Appendix 6.

Land Parcel K3, Land south of Poyle Road, Tongham

- 4.10 The parcel adjoins the southern edge of Tongham, stretching from Poyle Road at its northern boundary to the A31 to the south, which follows the Hog's Back. Significantly, the parcel does not lie within the Green Belt at present, and is instead designated as lying within Countryside Beyond the Green Belt, in the Local Plan.
- 4.11 Due to the considerable area within the southern half of the parcel that is designated as AONB, a PDA across the entirety of the parcel would be inappropriate and an area has instead been identified to the north of the parcel. The PDA relates to Poyle Road, and incorporates land either side of the recreation ground and a woodland block. Development proposals will need to give consideration to any impact upon nearby areas of ancient woodland, the setting of nearby listed buildings, the SNCI to the east, and the potential for enhancement of planting along the southern edge to assist with an appropriate relationship with the AONB further to the south on the Hog's Back.
- 4.12 The PDA covers an area of approximately 24 ha, and could accommodate in the region of 572 dwellings. The PDA scored 11.43 against the sustainability credentials and would therefore be ranked at the higher end of those main urban edge parcels identified for PDAs, as indicated at Appendix 6.

Appendix 1

Green Belt Purposes Schedule

Appendix 2

Green Belt Purposes Sensitivity Plan

Appendix 3
Environmental Capacity Analysis

Appendix 4

Environmental Designation and Local Plan Policy Mapping

Appendix 5

Sustainability Walking Distances for Land Parcels J1 and K3

Appendix 6

Sustainability Assessment Scoring

Appendix 7

Residential Capacity Calculations

Appendix 8

Updated Potential Development Areas (PDAs) surrounding Urban Areas