

Guildford Borough Local Plan Examination

05/18

Written Statement for Countryside Properties (PLC)



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Matter 9: Written Statement

Introduction

1. This Written Statement is prepared on behalf of Countryside Properties (PLC) who submitted representations in response to the Council's decision to exclude Land South of New Pond Road, Farncombe (Land Availability Assessment Ref: 2241) as a residential allocation in the Regulation 19 Proposed Submission Local Plan.
2. In 2014, a previous version of the emerging Guildford Local Plan identified the site as part of a proposed housing allocation. However, it was subsequently removed as the Council considered that the site (number 80) was no longer required. We outline below why we consider GBC's stance to be inappropriate with respect to this matter.
3. The site is capable of delivering circa 90 dwellings in the short term and could, therefore, contribute to Guildford Borough Council (GBC)'s 5 Year Housing Land Supply as the site is immediately developable.

Responses to Inspector's Questions

Question 9.1 – Is the spatial strategy as set out in the preamble to Policy S2 sufficient to explain the plan's approach to the overall distribution of development and guide future development during the plan period?

4. No. We believe that the spatial strategy is seriously deficient. The Plan needs to specify how the wider unmet needs of the Housing Market Area are being addressed (particularly with regard to Woking), but it is entirely silent regarding this important matter. Indeed, the policy heading 'Policy S2; Planning for the borough – our spatial development strategy' rather reinforces the perception that GBC is not seeking to address any wider unmet housing needs.
5. In relation to the Duty to Co-operate, the current NPPF emphasises the importance of collaboration between local authorities with regard to strategic priorities, meeting unmet development requirements from elsewhere and taking account of different geographic areas (see paragraphs 156 and 178-181).



6. The NPPF Draft text for consultation (March 2018) also refers to the importance of effective and on-going joint working between strategic plan making authorities and relevant bodies. It states that this is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere (see paragraph 28).
7. By failing to address unmet housing needs from elsewhere within the Housing Market Area (HMA), the Plan cannot meaningfully guide the overall distribution of development and future development during the plan period
8. We note that paragraph 8.8 of GBC's Responses to Inspector's Initial Questions [GBC-LPSS-001] states that the spatial strategy adopts a brownfield first policy which seeks to maximise suitable and available sites within existing settlements prior to allocating greenfield and/or Green Belt sites. The following spatial locations are considered to be the most sustainable options for growth and were assessed first to understand the maximum quantum of development that could be gained through the use of the most sustainable locations:
 - Within Guildford town centre
 - Within Guildford, and Ash and Tongham urban area
 - Within inset villages
 - Limited infilling within identified Green Belt villages
 - Redevelopment of previously developed sites in the Green Belt.
9. Paragraph 8.13 of the same response document goes on to say that in light of these conclusions, a detailed assessment of Green Belt sites was undertaken on a site-by-site basis, relating to the following set of spatial locations:
 - Guildford urban extensions
 - New settlement at the former Wisley airfield



- Development around villages, including sensitive Green Belt sites where development is justified

10. Clearly, the Plan lacks any clarity or guidance regarding the extent of development envisaged as arising from Neighbourhood Plans. Nor is it apparent how and when the Plan will monitor such provision, or seek to address any future disparities or failures in this source of housing provision.
11. We also believe that the Plan to be especially deficient in terms of providing guidance about development around villages, including sensitive Green Belt sites where it is justified (see our response to question 9.8 below).

Question 9.2 – Having regard to the need for housing, does the plan direct it strategically to the right places? Relevant aspects are:

- **The spatial distribution of existing and future need for housing**
- **Movement patterns**
- **Green Belt and landscape impact**
- **Infrastructure provision and constraints.**

12. In terms of the strategic approach to housing delivery we would make the following comments:

a) The spatial distribution of existing and future need for housing

13. Paragraph 4.232 of the Topic Paper: Housing Delivery [GBC-LPSS-SD-TP-003] fully acknowledges that a key issue that has been raised through each consultation period is in relation to GBC's proposed Spatial Strategy and Site Allocations Plan has been its approach to housing delivery. A significant number of comments suggest development is not being equally distributed across the borough.
14. The distribution of homes across the whole plan period is shown in Appendix 8 of the aforementioned Paper. It splits the borough into three parts in terms of the distribution of homes between 2015-2034. The Central area containing Guildford town and its surrounds, is identified as accommodating 6,658 dwellings. The West area of the borough is to accommodate 2,234 dwellings, and the East area 4,449 dwellings.

15. We consider that it is entirely correct to focus new housing provision upon the largest and most sustainable settlements, and their immediate surrounds. Our client's site is located at the southern end of the Central area, on the edge of Farncombe and also very close to the large town of Godalming, both of which are in Waverley borough.
16. However, whilst the Plan is right in seeking to steer new development towards the borough's largest town of Guildford, it fails to adequately take account of other development opportunities in sustainable locations such as our client's site on the edge of Farncombe (see also our response below to question 9.8). Particularly given that when our client's site was identified as a draft housing allocation at the Regulation 18 stage of the Plan, Waverley Borough Council (WBC) were supportive and publicly stated their willingness to work with GBC with regard to its delivery.

b) Movement patterns

17. We note the content of the Transport Topic Paper [GBC-LPSS-SD-TP-002] which refers to the production of the Guildford Town and Approaches Movement Study (Arup, March 2015) as being a key strategic study that informed the Local Plan-making process (paragraph 5.25). The aim of the study being to develop a recommended long-term movement strategy to 2050 for the town of Guildford. The study proposes a Sustainable Movement Corridor, and new rail stations at Guildford West (Park Barn) and Guildford East (Merrow), schemes NR2 and NR3 in the Infrastructure Schedule.
18. We also note the reference in paragraph 5.6 to GBC working with neighbouring borough and district councils including Waverley Borough Council, Woking Borough Council, Rushmoor Borough Council and Mole Valley District Council to discuss transport matters with.
19. It is very important that new residential development is allocated with careful regard to key transport modes.



20. In our representations we have highlighted the sustainability of our client's site on the edge of Farncombe, particularly given that the short 5- minute journey time between Farncombe and Guildford Railway Stations.
21. We note that the Guildford Borough Transport Strategy (December 2017) [GBC-LPSS-SD-038ASP7] - ASP7 Improved bus service at Artington Park and Ride and/or new Southern Park and Ride.
22. Our client's site is located to the South of New Pond Road, Farncombe and is also located close to the A3100, and the Artington Park & Ride facility with its frequent bus service links into Guildford town centre.

c) Green Belt and landscape impact

23. Topic Paper: Green Belt and the Countryside (December 2017) [GBC-LPSS-SD-TP-003] contains key background evidence to the Submitted Plan.
24. It acknowledges that the borough currently comprises approximately 89% Green Belt. The only settlement currently inset or removed but surrounded by the Green Belt is the Guildford urban area itself (paragraph 2.12).
25. It refers to the primary purpose of the Green Belt and Countryside study (GBCS) being to review the extent to which land parcels across the borough met the different purposes of the Green Belt (paragraph 3.3 of GBC-LPSS-SD-TP-003). It goes on to identify Potential Development Areas (PDAs) and Potential Major Development Areas (PMDAs) for future housing and other growth requirements in the event that it could not identify sufficient suitable land within the urban areas and villages.
26. Reference is made to further work undertaken following a resolution made at an extraordinary meeting of the Council on 13 January 2014, which resulted in a special Local Plan Scrutiny Forum, held on 4 March to enable the community to share their views on the evidence base and raise issues concerning methodology and fact only. It is stated that this exercise led to the preparation of Volume II addendum and a re-issue of Volume IV (paragraph 3.6 of GBC-LPSS-SD-TP-003).

- 27.** We are concerned that GBC took decisions for non-technical reasons, with regard to the assessment of sites, which resulted in revised findings.
- 28.** The Topic Paper acknowledges that the Volume II addendum amended the way in which the land parcels were assessed in relation to two Green Belt purposes. It also reconsidered the identification of PDA's around Guildford urban area. Volume II involved a sieving approach, whereby those parcels that were assessed as being the most sensitive against Green Belt purposes were not considered appropriate for development. Given the sustainability merits of development around the urban area, Volume II addendum provided a more detailed consideration of the development potential of all urban edge parcels. Decisions regarding the plan's spatial strategy could then be informed against a wider set of considerations (paragraph 3.7 of GBC-LPSS-SD-TP-003).
- 29.** We agree with GBC that there are exceptional circumstances that justify amending Green Belt boundaries in accordance with the NPPF, paragraph 83. In particular, the evidence base identifies a high level of need for market and affordable housing and employment. GBC states that given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt; to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford borough would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns (paragraph 4.87 of GBC-LPSS-SD-TP-003).
- 30.** It is explained that the draft Local Plan (2014) treated all PDAs as reasonable options for development regardless of the extent to which the land parcel within which it sits scored against Green Belt purposes (as shown on the sensitivity map). However, following the feedback from consultation and the new evidence available, GBC reconsidered how Green Belt was used as a constraint, and the Regulation 19 Local Plan (2016) sought to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. It is specified that whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as

contributing more towards the purposes of the Green Belt than those judged to be of lesser Green Belt value. In giving greater weight to the sensitivity of the Green Belt, GBC have, therefore, sought to ameliorate the consequent impacts on the Green Belt as much as is reasonably possible (paragraph 4.88 of GBC-LPSS-SD-TP-003).

- 31.** We believe that GBC's revised approach fails to give adequate regard to the actual impact of proposed development upon the purposes of the Green Belt. Instead, it gives undue regard to the impact of the wider parcel of Green Belt land in which it sits.
- 32.** GBC argue that given the limited central ribbon within which development could potentially occur, safeguarded land in Guildford would result in an unsustainable pattern of development. GBC has stated that it would create an oblong-shaped urban area, pushing new urban extensions even further away from the town centre and creating unsustainable communities (paragraph 4.94 of GBC-LPSS-SD-TP-003).
- 33.** Whilst we agree that there is overwhelming evidence to demonstrate that that there are exceptional circumstances to justify amending Green Belt boundaries, we do not believe that GBC has made adequate provision to meet long-term housing needs, as advocated within the NPPF.
- 34.** Indeed, GBC acknowledge that it does not meet the second requirement, namely safeguarding sufficient land in order to meet longer-term needs (paragraph 4.95 of GBC-LPSS-SD-TP-003).
- 35.** GBC says that it considers that any future local plan is likely to necessitate further Green Belt release around the villages. Given that the Local Plan will be required to be reviewed in the near future, GBC says that it does not consider that it is appropriate to delay making adequate changes to the Green Belt now in order to address long-term housing provision, particularly given the current acute level of housing need in the borough (paragraph 4.96 of GBC-LPSS-SD-TP-003).

36. We do not consider the changes currently being proposed by GBC to the Green Belt are adequate to meet its severe housing needs that will necessitate further Green Belt amendments in the short-term.

d) Infrastructure provision and constraints

37. We have already referred in this Statement to the urgent need for housing provision now, given affordability and market signals. We also believe that infrastructure provision and constraints provide an added need for the allocation of small and medium sized sites in locations that are both sustainable and deliverable in the short-term.
38. The consequences of any delay in the provision of key infrastructure could be severe given the Council's stepped approach to housing delivery. Inevitably, large strategic sites are often not easy to deliver and are often prone to unforeseen delays.
39. Accordingly, it is important that should monitoring demonstrate housing delivery is slow, or delayed due to infrastructure constraints it is important that corrective actions are taken. The Plan refers to monitoring indicators, and matters to be addressed in future AMR's and Local Plan Reviews. This is not a proactive approach, and fails to ensure that corrective triggers and actions are a key component of the Plan itself.

Question 9.3 – Are the proposed new business land and floorspace allocations in the right strategic locations? Relevant aspects are:

- The spatial location of existing and future needs
- Movement patterns
- Green Belt and landscape impact
- Infrastructure provision and constraints

40. No comment.

Question 9.4 – Having regard to the extent to which it is proposed to release Green Belt land and develop greenfield sites, do the plan's policies strike the right balance (in terms of housing provision) between the use of urban and previously developed land and urban extensions? Has the potential for further residential development in the urban area been

adequately explored? (See also Item 5 of my initial questions).

41. We are supportive of GBC's desire to maximise the use of urban and previously developed land for housing, and note that the council estimates that approximately a quarter of all housing will be delivered from this source. However, throughout the course of our representations at various stages of the Local Plan process, we have consistently outlined our concerns regarding the deliverability of some sites. We have highlighted sites which have been proposed over the course of many years, which have failed to move forward to delivery due to ownership, site constraints, viability etc.
42. Any delays to delivery will impact on completion rates. Consequently, it is vital that delivery assumptions in respect of brownfield sites are realistic, particularly when they are already known to be complex in nature.

Question 9.5 – Having regard to 9.2 to 9.4 above, are the overall amount of land proposed to be released from the Green Belt, and the strategic locations for Green Belt release, justified by exceptional circumstances?

43. No comment.

Question 9.6 - Does the plan take a sound approach towards the inseting of various villages from the Green Belt?

44. No comment.

Question 9.7 - Taking into account the extent of housing, employment and other needs, does the plan take a sound approach towards the protection of the landscape, including the AONB and AGLV, and the countryside generally?

45. In our response to questions 9.2 (c) above and 9.8 below, we explain why we consider that GBC has failed to maximise and realise available development opportunities due to its unwillingness to make sufficient adjustments to Green Belt boundaries in order to ensure sufficient housing allocations are delivered to improve overall affordability in the borough.



46. We consider that GBC appears to have taken a somewhat 'blinded' approach to any development within the AONB, with no thorough site assessment having been done. We consider this to be a significant missed opportunity, and refer back to the Council's earlier Regulation 18 work which concluded in 2014 that our client's site to be a good and sound proposed housing allocation. It remains unclear, what precisely has changed since then to justify the site's deletion from the Regulation 19 Plan, particularly given that GBC's original findings were made after the NPPF's publication.
47. We consider that the submitted evidence demonstrates that exceptional circumstance do exist to justify an allocation in the AONB. GBC has said that it has sought to maximise development opportunities, but is unable to deliver its total housing requirement, and affordability and housing need are in danger of deteriorating even further in the early part of the Plan period due to the Council's stepped approach to housing delivery. In such exceptional circumstances, it is appropriate to consider suitable AONB releases such as our client's site, which is located on a relatively slim area of land sandwiched in between the edge of Farncombe and the B3000 (New Pond Road). We have submitted supporting landscape evidence in our representations to demonstrate that the site does not warrant AONB status.

Question 9.8 - If the Plan had to accommodate a greater housing requirement, for example through a higher OAN, what would be the implications in terms of the spatial strategy?

48. It is evident that the Draft Plan completely fails to address the urgent housing need that is not currently being met. This is clearly demonstrated by the Annual Housing Target Table that accompanies Policy S2 as amended in the Minor modifications to and Errata for the Proposed Submission Local Plan (2017)[GBC-LPSS-CD-003, p.4]:

Year	Housing Number	Year	Housing Number
2015/2016	654	2025/2026	600
2016/2017	654	2026/2027	700
2017/2018	654	2027/2028	700
2018/2019	654	2028/2029	700
2019/2020	450	2029/2030	800
2020/2021	450	2030/2031	810
2021/2022	500	2031/2032	850
2022/2023	500	2032/2033	850
2023/2024	500	2033/2034	850
2024/2025	550		

- 49.** The above table demonstrates that against the current OAN of 654 dwellings at a time of unprecedented affordability pressures, Guildford’s housing requirement figure is proposed to fall significantly, and is not envisaged to be met again until 2025/26, some 6 years after the envisaged adoption date for the new Local Plan.
- 50.** We consider that there is strong evidence available, particularly with regard to affordability, market signals and unmet need from elsewhere in the HMA that suggests that a significant uplift to the OAN is required. The technical evidence available demonstrates that Guildford’s housing requirement needs to rise significantly if overall affordability is to be improved.
- 51.** Indeed, paragraphs 4.2.30-4.2.31 of the Draft Plan as amended [see GBC-LPSS-CD-003, p.7] fully acknowledges that high demand and limited supply of existing and new housing are amongst the factors that have contributed to the borough being one of the least affordable areas of the country, outside of London, with the West Surrey Strategic Housing Market Assessment 2015 and Addendum 2017 indicating that over half of all Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy.
- 52.** It is also noteworthy that the Government’s proposed formula for assessing local housing need published in September 2017, suggested that Guildford’s annual housing requirement could rise from 654 to 789 dwellings.

- 53.** It is apparent from the content of 'Table 1: Completions of new homes per year in Guildford borough' [GBC-LPSS-CD-020] that actual housing delivery within Guildford borough has been particularly poor in recent years:

Year	Completions (net)
2007/08	478
2008/09	130
2009/10	227
2010/11	190
2011/12	262
2012/13	234
2013/14	137
2014/15	242
2015/16	388
2016/17	294

- 54.** Table 4 and 5 within the same document illustrate that GBC is currently unable to demonstrate a five year supply of deliverable housing land. Taking account of the OAN, a buffer and the deficit since 2015, the quantum of supply identified is identified as only being 2.36 years.
- 55.** As a consequence, the spatial strategy will, in our opinion, need to be amended in order to identify both a higher overall housing requirement figure, and also an enlarged supply of smaller and medium sized sites that are capable of being delivered in the near future. These measures are deemed vital in order to address the acute affordability and supply constraint pressures currently being exerted within Guildford borough. It is also important that housing delivery assumptions are realistic, particularly with regard to brownfield site delivery given that a number of proposed allocations have been around for a long time.
- 56.** In order to achieve this, we believe that GBC will need to revisit previously produced work and re-evaluate PDA (Potential Development Area)'s that it previously discounted.

Allocation at Farncombe

57. GBC's Topic Paper: Housing Delivery [GBC-LPSS-SD-TP-004] makes reference in paragraph 4.176 to the identification of a PDA at Farncombe, located on medium sensitivity Green Belt within the AONB. It says:

“...The NPPF states, at paragraph 116, that planning permission should be refused for major developments except in exceptional circumstances and where it can be demonstrated they are in the public interest. At approximately 100 homes this is classed as major development. We do not consider that the benefits with providing these homes pass the considerations listed within the NPPF bullet points and which form part of the public interest assessment”.

58. We disagree. We believe that there are exceptional circumstances, in particular, acute housing need, that mean the Local Plan must ensure that a healthy pipeline of housing provision is created now. We do not think that it is either appropriate or acceptable for GBC to instead seek to rely upon a stepped approach to housing delivery and a future Local Plan Review to address this matter.
59. We have attached at Appendix 1 an example of work previously undertaken which will need to be revisited, should there be any increase to the OAN. The appendix contains the front section of the Waverley Borough Submission Plan 1: Strategic Policies and Sites – Topic Paper: Green Belt (updated December 2016). This refers to the Green Belt Review work WBC commissioned AMEC to undertake in 2014.
60. The consultants identified areas on the edge of the main settlements with potential for removal from the Green Belt. Paragraph 5.2.4 of the Topic Paper identifies land (shown pink on the plan) [*see plan on p.8 of Appendix 1], which wraps around the urban edge on either side of Binscombe, offers potential for limited release to the south east of Binscombe but not to the north west where there is a strong visual connection with the open countryside (primarily within Guildford Borough).

61. It is apparent from the extracts provided immediately below from Waverley's Green Belt Topic Paper that there is technical evidence available which demonstrates that the wider land in which our client's site sits, warrants removal from the Green Belt.

62. However, GBC's decision to remove land south of New Pond Road, Farncombe previously identified as a housing allocation resulted in WBC not accepting the technical advice of its own consultant to remove land from the Green Belt

“5.3.2 The remnant segments as shown on the previous plan are small and of varying character with land to the north of Green Lane offering the clearest opportunity for development without significant harm occurring. More generally, land up to the B3000 New Pond Road (within Guildford Borough) could be taken without significant harm occurring, the B3000 acting as a strong northerly edge to Farncombe.

5.3.3 Strong landscape treatment to the edge adjacent to the B3000 would be required to reinforce the boundary to the Green Belt.

5.3.4 Flood risk appears to be a significant consideration in this location.

b) The Council's Conclusion

5.3.5 These are relatively small parcels of land and their potential for development would be affected by other factors, including existing land uses, flooding issues and tree cover. Any change to the Green Belt boundary in this location would need to be co-ordinated with Guildford Borough. However, it is not making any changes to its Green Belt boundary on the land between New Pond Road and the Waverley boundary and as such the Council has rejected the recommendation to remove these areas of land”.

63. It is apparent from both the fact that our client's site was previously identified as a draft housing allocation within a previous version of the Draft Plan, together with the technical work published by GBC, that there are opportunities to remove land

from the Green Belt along its border between Waverley and Guildford in the Farncombe area. Given that GBC is heavily constrained by Green Belt, Thames Basins Heath SPA and Surrey Heaths AONB designations, it is vital that GBC takes a realistic approach to amending boundaries to facilitate housing development in locations where such designations lack technical justification.

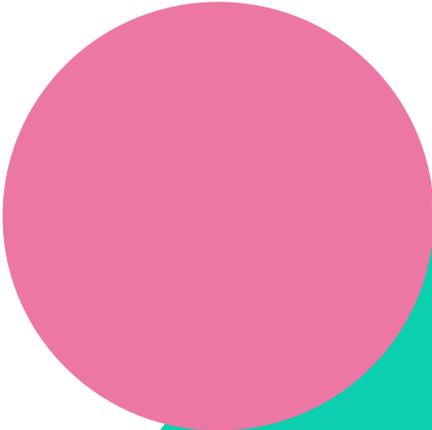
64. We believe that the previously proposed housing allocation at Farncombe to be an example of a site that GBC will need to reconsider as a potential housing allocation arising from any required increase to the OAN or to the supply of small and medium sized sites. Sites such as this, which can deliver approximately 100 dwellings, are capable of making a valuable contribution to boosting GBC's housing delivery, and very importantly, are also capable of early delivery.

Question 9.9 - What are the reasons that have led the Council to propose including new land in the Green Belt around Ash and Tongham, and can the circumstances be regarded as exceptional? What are the implications for the future housing needs of this Urban Area?

65. No comment



Appendix 1



Waverley Borough Submission
Local Plan 1: Strategic Policies and Sites

Topic Paper:
Green Belt

August 2016
updated December 2016



Waverley
BOROUGH COUNCIL

Topic Paper – The Green Belt

This topic paper sets out how the Council has developed the policy approach taken in the Local Plan Part 1: Strategic Policies and Sites in relation to the Green Belt.

The intention of the topic papers is to provide background information; they do not contain any policies or proposals. They are also living documents that will change to reflect amendments to the approach through consultation or other factors.

The main areas covered by this topic paper are:

- Waverley's Green Belt Review
- Amending Green Belt boundaries
- Inset of villages (removed from the Green Belt)
- Washed over villages (remaining in the Green Belt)

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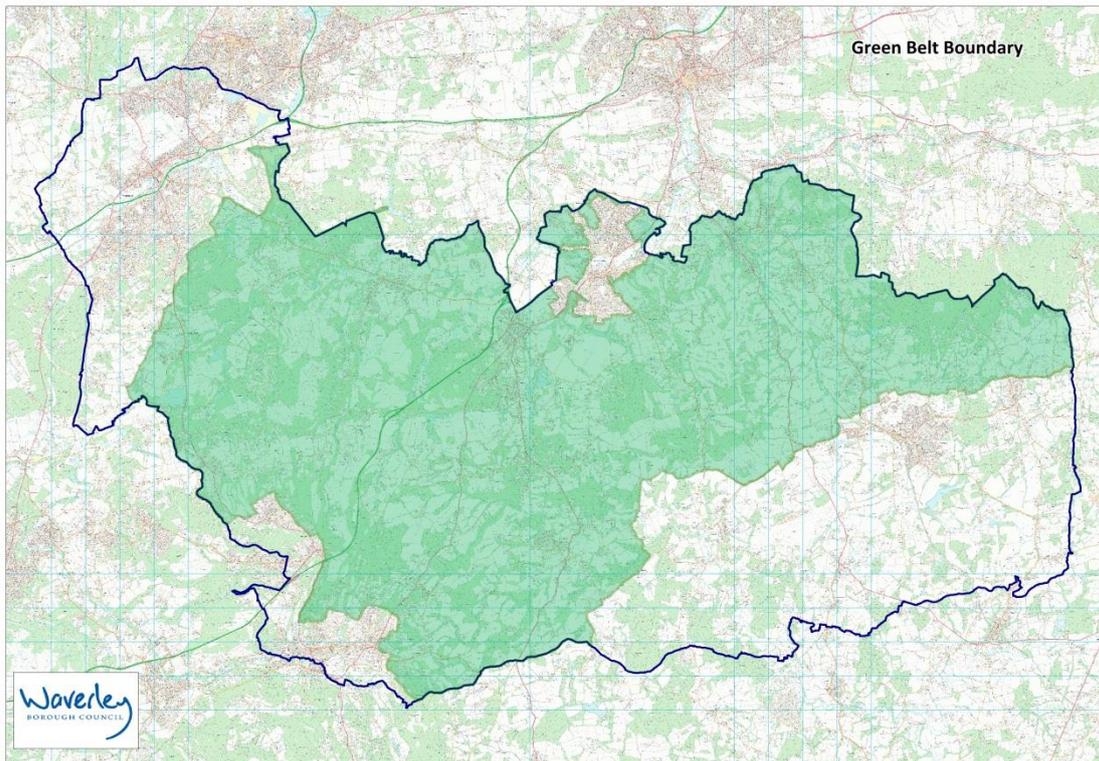
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1 Policy Background

- 1.1 The NPPF (para 80) states that Green Belts serve five purposes:
- to check the unrestricted sprawl of large built- up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 1.2 In defining the second purpose of preventing neighbouring towns merging into one another, this clearly refers to towns or their equivalent in size and function as opposed to settlements generally. Village and hamlets which are often 'washed over' by the Green Belt do not fall into this category.
- 1.3 The National Planning Policy Framework is clear (para 83) that, *'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan'*. However, *the NPPF is equally clear (para 14) that 'Local Plans should meet objectively assessed needs... unless specific policies... indicate development should be restricted.'*
- 1.4 It also states that villages should only be included in the Green Belt if the open character of the villages makes an important contribution to the openness of the Green Belt (paragraph 86).
- 1.5 The NPPF has a general presumption against development in the Green Belt unless very special circumstances are demonstrated. There are, however, some uses that are appropriate in the Green Belt and these are listed in paragraphs 89 and 90.

2. Local Context

- 2.1 Currently the Metropolitan Green Belt covers some 61% of the Borough. The original boundary was approved as part of the Surrey Development Plan in 1958 and a substantial extension in the south western part (in what is now Waverley Borough) was approved in 1974. The definitive boundary was finally drawn up in the Waverley Borough Local Plan 1984.



3. Why did Waverley need a Green Belt Review?

3.1 When the Waverley Core Strategy was withdrawn in June 2013, the Council acknowledged that it was unlikely that there would be sufficient land within the built up areas of the Borough to meet its future housing needs, then up to 2030 (now 2032). In the withdrawn Core Strategy the Council indicated that some limited Greenfield releases around the four main settlements of Farnham, Godalming, Haslemere and Cranleigh would be selected. However, the criteria for such releases was that this would be on land that is not within the Green Belt, Area of Outstanding Natural Beauty (AONB) or Area of Great Landscape Value (AGLV).

3.2 Following the Core Strategy Examination, the Inspector's letter dated 13 June 2013 (para. 20) refers to a Green Belt Review:

3.3 *"I note that your Council's justification for not undertaking a Green Belt review (Council's Statement on Matter 2: para. 2.2.23-27) derives in part from its view that housing sites outside the Green Belt were available to meet the policy CS2 housing target. However, given that this target was itself explicitly influenced by the presence of constraints including the Green Belt, this appears to be a circular argument. While the South East Plan (SEP) identified no requirement for a Green Belt review in Waverley Borough, the relevant SEP policies have been revoked. If the Council wishes to maintain its opposition to a Green Belt review, then such a stance would need to be justified in the context of the Framework's policies, as discussed above.*

However, if a Green Belt review were to be considered then this has the potential to amount to a fundamental change to the Plan's strategy that could not be accommodated within the present examination."

3.4 As a result of this, the Council has had to review its strategy for the delivery of housing and the Green Belt boundary review has informed this process. It was considered necessary to undertake a review of the Green Belt so that all possible options for meeting housing need were considered.

4. The Green Belt Review

4.1 Waverley commissioned AMEC Environment and Infrastructure UK Ltd to carry out a Green Belt Review for Waverley in 2014.

4.2 This was carried out in two stages:

- Part 1 is strategic in nature, which was appropriate at this stage of the Local Plan development. The consultants assessed the whole of the Green Belt to consider how it performs against the specific purposes of the Green Belt set out in paragraph 80 of the NPPF. As a result of this assessment the consultants identified specific locations for more detailed consideration;
- Part 2 This builds on the recommendations of Part 1 and contains three key elements:
 - The detailed assessment of some areas on the edge of main settlements to establish their potential for removal from the Green Belt
 - The assessment of villages in the Green Belt and how they should be treated; and
 - The assessment of land that could be considered as additional Green Belt.

4.3 The key recommendations of the Green Belt Review in relation to these areas are set out below. For each of these recommendations the consultant's recommendation in full is included with a map showing the current settlement/Green Belt boundary and an indication of the change proposed in the Review.

4.4 The Council has given careful consideration to each of the recommendations. It has not accepted them all and reasons for this are provided in each case. The suggested changes have been incorporated into the Waverley Local Plan Part 1: Strategic Policies and Sites, and this is the subject of consultation from 19 August to 3 October 2016.

4.5 In some cases the recommended changes are sufficiently specific that the Council has been able to provide an indication of how the Green Belt boundary might change. In other areas, the recommended changes apply to a broad area, with an expectation that the Council would establish the precise boundary following more detailed assessment in Part 2 of the Local Plan,

following consultation with local communities, and which will hopefully, align with the work that many are currently doing on neighbourhood plans.

- 4.6 The [Green Belt Review](#) comprises two volumes which are available as part of the evidence base and supporting documents on the Council's website. More detailed analysis of the various segments around the towns and villages is available in the Review documents.
- 4.7 The Topic Paper now examines the three sets of recommendations:
- Areas on the edge of the main settlements with potential for removal from the Green Belt.
 - Areas considered for designation as Green Belt;
 - Villages with Potential to be removed from the Green Belt;
 - Washed over villages (remaining in the Green Belt).

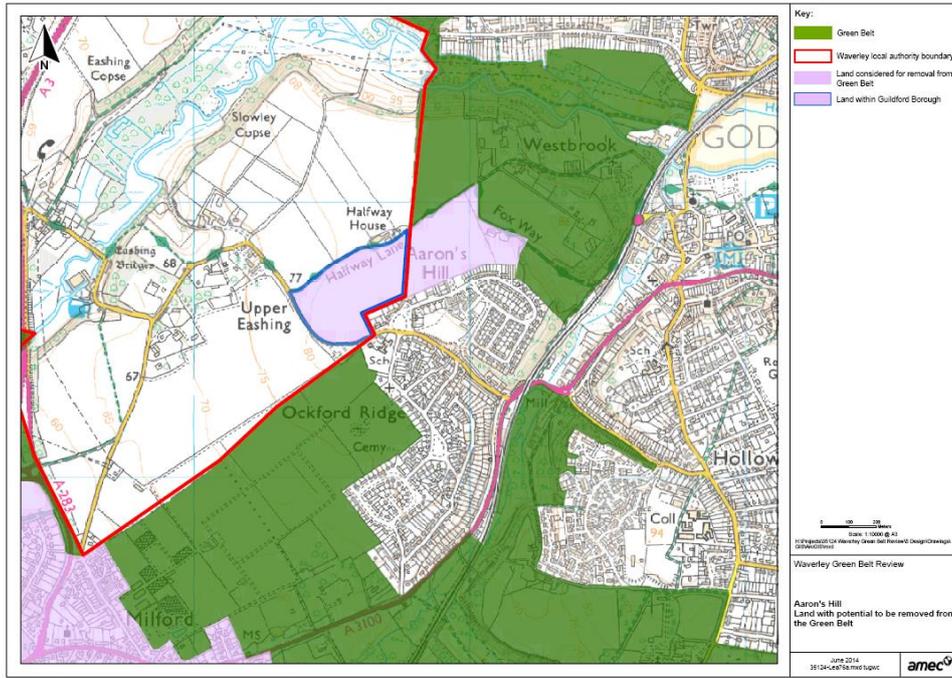
5. Areas on the edge of the main settlements with potential for removal from the Green Belt

- 5.1 The consultants recommended changes to the Green Belt around Godalming in three locations:

5.1.1 Land at Aarons Hill, Godalming

a) Consultant's Conclusions and Recommendations

- 5.1.2 There is the opportunity to re-define the urban edge using Halfway Lane/ Westbrook Road and structural planting, rounding-off current development without significant intrusion into open countryside. Liaison with Guildford would be required on land within Guildford Borough between Eashing Lane and Halfway Lane.



b) The Council's Conclusion

5.1.3 This piece of land is open, arable landscape with extensive views to the north-west. There is the opportunity to re-define the urban edge using Halfway Lane/ Westbrook Lane to the north without significant intrusion into open countryside.

5.1.4 Subject to further discussions with Guildford Borough Council, the area shown on the plan could be suitable for removal from the Green Belt. There is currently insufficient information on its deliverability for housing. Therefore, this matter will be considered further in Local Plan Part 2.

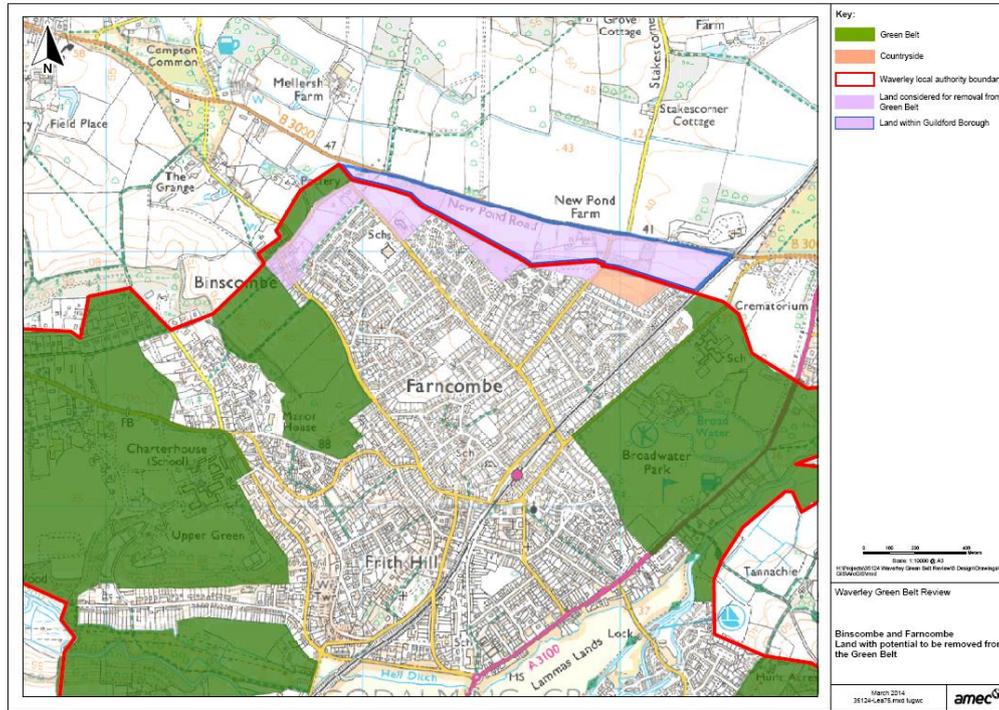
5.2.1 Land at Binscombe, Godalming

a) Consultant's Conclusions and Recommendations

5.2.2 The land in this area performs a clear local amenity function, bringing the wider countryside into the town through a substantial wedge which separates Binscombe from development along, and off, Charterhouse Road. Whilst the land's strategic Green Belt function is not significant, there is no strong boundary separating this land from the wider countryside meaning that a sense of visual openness is maintained deep into the land toward Farncombe.

5.2.3 Whilst development would effectively be contained on three sides and 'round-off' the urban edge, the role of the land in setting a context for this locality, clear amenity function and topographical constraints limit development potential.

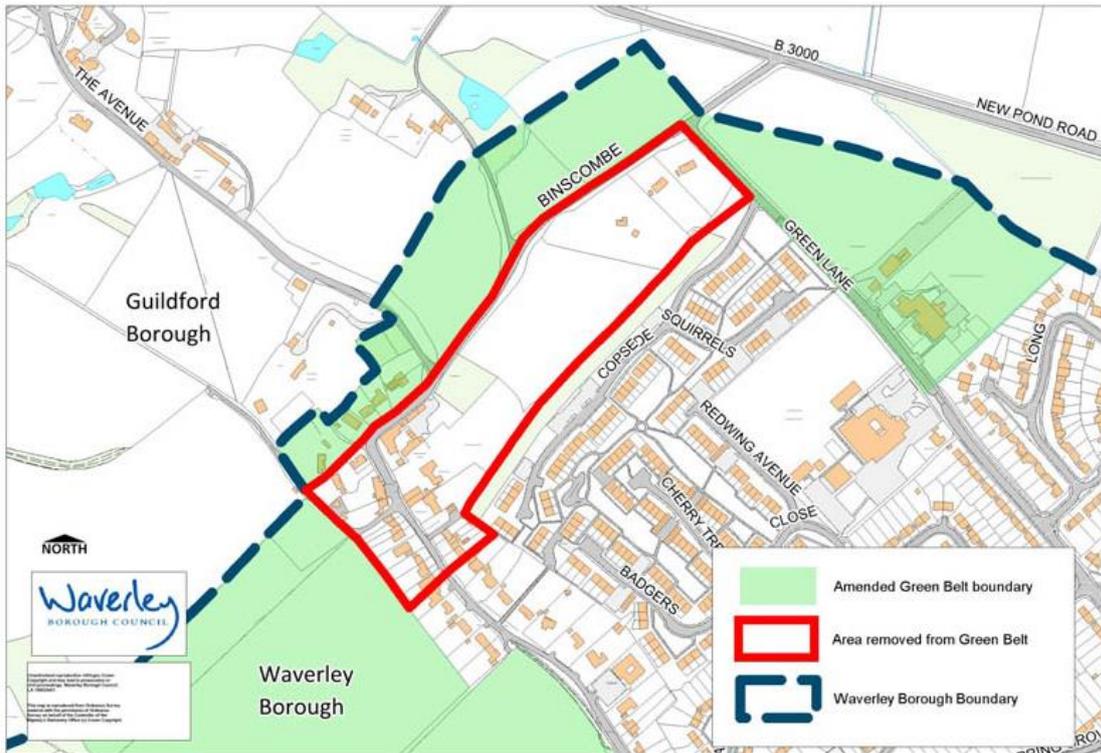
5.2.4 The land (shown pink on the plan below) which wraps around the urban edge on either side of Binscombe, offers potential for limited release to the south east of Binscombe but not to the north west where there is a strong visual connection with the open countryside (primarily within Guildford Borough).



b) The Council's Conclusion

5.2.5 This segment of land also included an area to the east of Green Lane, occupied by the Loseley Fields Childrens' Centre and the sports pitches adjacent. This part of the area has been rejected by the Council for removal from the Green Belt, for reasons explained below in relation to the sites in Farncombe.

5.2.6 However, the remaining piece of land to the east of Binscombe is predominantly in agricultural use. It helps to define the western edge of Godalming, but does not contain it. The removal of this piece of land from the Green Belt would effectively round-off the settlement and not affect the openness of the countryside in this area. This area is to be removed from the Green Belt as shown on the plan below.



5.3.1 Land at Farncombe, Godalming

a) Consultant's Conclusions and Recommendations

5.3.2 The remnant segments as shown on the previous plan are small and of varying character with land to the north of Green Lane offering the clearest opportunity for development without significant harm occurring. More generally, land up to the B3000 New Pond Road (within Guildford Borough) could be taken without significant harm occurring, the B3000 acting as a strong northerly edge to Farncombe.

5.3.3 Strong landscape treatment to the edge adjacent to the B3000 would be required to reinforce the boundary to the Green Belt.

5.3.4 Flood risk appears to be a significant consideration in this location.

b) The Council's Conclusion

5.3.5 These are relatively small parcels of land and their potential for development would be affected by other factors, including existing land uses, flooding issues and tree cover. Any change to the Green Belt boundary in this location would need to be co-ordinated with Guildford Borough. However, it is not making any changes to its Green Belt boundary on the land between New Pond Road and the Waverley boundary and as such the Council has rejected the recommendation to remove these areas of land.



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