

Reference ID 17443617

Thakeham Homes Ltd.

Guildford Borough Local Plan Examination

Issue 1 Plan Preparation; Issue 6
Homes for All; Issue 9 Spatial
Strategy, Green Belt and
Countryside Protection.

1. This response is made by RPS on behalf of Thakeham Homes and is specific to Issue 1 (Plan Preparation); Issue 6 (Homes for all) and Issue 9 (Spatial Strategy). The responses by Thakeham to other matters, specifically Issue 2 (OAN); Issue 3 (Unmet Needs and the Duty to Cooperate); Issue 4 (Housing Trajectory); Issue 5 (Housing Land Supply) are addressed as part of the wider Guildford Housing Forum of which Thakeham is a member.

2. This response follows a representation to the Regulation 19 consultation and should be read in relation to the report and appendices provided therein:
 - Guildford Borough Submission Local Plan: Strategy and Sites, RPS for Thakeham Homes, July 2017
 - Deliverability Document (July 2017)
 - Air Quality Assessment
 - Desk Based Heritage Assessment
 - Ecological Deliverability Note
 - Landscape, Visual Appraisal and Green Belt Review
 - Noise Risk Assessment
 - Surface Water Drainage Strategy
 - Transport Feasibility Assessment
 - Utilities and Foul Water Drainage Assessment

3. Additionally, accompanying this report are the following appendices which provide an up-to-date feasibility assessment of the proposals, more detailed technical assessment of the key issues and demonstrate the support of Stagecoach for the proposed park and ride:
 1. Delivery Document
 2. Transport Strategy
 3. Built Heritage Statement
 4. SANG Assessment and Delivery Technical Note

Issue 1: Plan Preparation**Question 1.1:****Is the Sustainability Appraisal adequate?**

4. The SA Report was updated by AECOM in June 2017 (GBC-LPSS-CD-005) to accompany the Proposed Submission Draft of the Guildford Local Plan. It summarises the SA work which has been undertaken since the SA process began. Para 2.1.2 explains that the SA Report consider “reasonable” alternatives.

- Page 109 of the SA sets out that “It was not possible to simply apply the SA framework given the number of site options and limited site-specific data availability” and that instead a criteria based methodology was developed suited to site options appraisal.
- Appendix IV of the SA relates to site options. Table C: Housing site options, within the SA Report categorises the performance of the sites on a Red, Amber, Green (RAG) scale. The table on page 123 has appraised *Land to the west of Fairlands, south west of Hunts Farm & west of Dunmore Farm, Fairlands, which is a broader parcel of land totalling 41.28 hectares, encompassing sites 2014; 2072 and 2190*. The SA of site appraisals does not include any commentary, as can be seen in the extract below.

Extract of Table C: Housing Site Options appraisal findings (N.B Proposed allocations are highlighted in **bold**)

Spatial hierarchy	Ward	Site name	LAA ref	Area (ha)	1. European biodiversity	2. SSSI	3. SNCI or LNR	4. Key employment site	5. Flood risk	6. Surface water flood	7. Healthcare facility	8. Recreation facility	9. District/Local centre	10. Primary school	11. Secondary school	12. Historic Park/Garden	13. Scheduled Monument	14. Archaeology	15. Listed building	16. Agricultural land	17. AONB	18. PDL	19. 'A' road	20. Railway station	
10	Send and Lovelace	Land at Garlick's Arch, Send Marsh	2258	28.9	Green	Green	Red	Red	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	
	Shalford	Land at Hornhatch Farm, New Road, Chilworth	12; 2032	5	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
		Pond Farm, Furze Lane and Land at New Pond Road	1460; 2241	16	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
		Land to the east of Shalford, Chinthurst Lane	2034	9.34	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
	The Pilgrims	Land south of Halfway House at Aaron's Hill, Upper Eashing	2254		Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
Worplesdon	Land to the west of Fairlands, south west of Hunts Farm & west of Dunmore Farm, Fairlands	2014; 2072; 2190	41.28	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	

- The Council has produced an updated Land Availability Assessment¹ (October 2017) (GBC-LPSS-SD-006a), which they consider “meets the requirement of the NPPG in assessing land availability for housing and economic development uses” (page 3). Page 13 of the LAA states that with regard to ‘Discounted Sites’, “Many sites have been considered but discounted, having been assessed against the methodology. The reason a site has been discounted is given in relation to its suitability, availability and viability, and overall deliverability. The reason given is not necessarily all encompassing, rather a stated reason has caused the site to be discounted. However, there may also be other concerns relating to the development potential of the site. If a reason relates to concerns about deliverability, this is likely to be that the quantum of development needed to make a site viable is not likely to be suitable in planning terms”. Page 14 of the LAA states: “Whilst many sites in the Green Belt have been

¹ <http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=26603&p=0>

considered in this LAA, and some discounted sites make reference to the findings of the Green Belt and Countryside Study and the sensitivity of the Green Belt, this and other factors is considered alongside the Sustainability Appraisal”.

8. Site Ref 118 Land to the west of Fairlands is identified in Appendix E of the LAA and under the ‘Green Belt’ as a discounted site for housing (page 455). The commentary explains that *“Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt”².*
9. The site was previously proposed in the Draft Plan (2014) (GBC-LPSS-SD-072) to become safeguarded land. The commentary relating to the site (27 hectares) was set out in the ‘Local Plan Planning for Sites’³ document.

Commentary

10. It is considered that the Plan is not compliant with the requirement of the Strategic Environmental Assessment Directive or that of the Environmental Assessment of Plans and Programmes. The site has been previously been identified as safeguarded land but has been ruled out due to it no longer according with the proposed spatial strategy in the Local Plan. However, the Council has already acknowledged in the Settlement hierarchy study (May 2014) (GBC-LPSS-SD-035)⁴ that Fairlands is a sustainable location for growth, *“to which it would be appropriate to direct new development towards”* (paragraph 6.2). Therefore, the SA should have considered Fairlands as a sustainable location.
11. All reasonable alternatives should be considered within the development plan and the SA/SEA process, and that failure to do so is a matter of serious concern which can deem a Plan unlawful. In considering reasonable alternatives in the context of the SEA Directive, it has been established in law that the Council’s assessment should be fair, equitable and via public scrutiny. It is also a requirement under Article 5(1)(h) of the SEA Directive in reference to ANNEX I that authorities outline in their Environmental Assessment all the reasonable alternatives that have been considered and the reasons for discounting them. Given this is a statutory requirement, RPS would have expected that the Council follow this and provide evidence of such. It has not.
12. While the strategic options are important to the strategy of the Plan, their consideration does not abdicate the Council of having regard to its responsibility to consider site specific alternatives that are within the geographical scope of the Plan. RPS does not advocate

² <http://www.guildford.gov.uk/newlocalplan/landavailabilityassessment>

³ <http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=17346&p=0>

⁴ <http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=16930&p=0>

appraising unreasonable alternatives, however where reasonable alternatives do exist, it is incumbent on the authority to appraise them appropriately and lawfully.

Appraisal of Options

13. The Environmental Assessment of Plans and Programmes and Regulations 2004 sets out the requirements for the Environment Report under Schedule 1. In accordance with Article 5(1) of the SA Directive and regulation 212(2) of the SEA Regulations, the environmental report must **identify, describe and evaluate** (RPS emphasis) the likely significant effects of the reasonable alternatives to the plan taking into account the objectives and geographical scope of the plan.
14. Schedule 2 'Information for Environmental Reports' refers to likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as biodiversity, etc.
15. It is considered that the Final SA Report does not fully address the SEA Directive as there is no commentary relating to the sites that have been discounted. Furthermore, it does not, for example, consider short, medium and long-term effects.
16. Land at Fairlands is clearly a reasonable alternative that should have been appraised as an individual site within the Council's SA/SEA process. In this context, a development site capable of accommodating residential development in a sustainable location, and which had previously been proposed by the Council to be safeguarded land, should have been fully appraised.
17. Whilst the Council seeks to caveat its approach to the SA in terms of "*It was not possible to simply apply the SA framework given the number of site options and limited site-specific data availability*", the number of sites should not preclude a thorough assessment. Furthermore, site-specific data was available for Fairlands, as this was submitted to the Council as part of the Reg 19 Reps (June 2017). Section 8, for example, of those representations provided details about the suitability, availability and deliverability of the site.
18. The Final SA report instead puts Land at Fairlands (LAA Ref 2014) with two other sites (LAA Ref 2072 and 2190) and provides no explanation for not selecting the site. The only commentary relating to Land at Fairlands is found in Appendix E of the Land Availability Assessment document, which states that "*Our spatial strategy and site allocations have been considered through the Sustainability Appraisal and this site no longer accords with the proposed spatial strategy in the Local Plan. The site was identified in the Green Belt and Countryside Study but is located within high sensitivity Green Belt*" (p544). However, it is not

clear from the commentary whether the conclusions would have been the same if the SA had appraised the Land at Fairlands separately from the other two sites.

19. The assessment of the site should actually have been contained within the Environmental Report, which is the SA incorporating the SEA. The ‘Save Historic Newmarket Ltd v Forest Heath DC judgement [2011] EWHC 606 (Admin) (25 March 2011)⁵’ clarifies that that consultees should be able to find, in the Final SA Report, clear explanation of the reasonable alternatives considered within the preparation of a Plan, and the reason for their inclusion or exclusion from the proposals. It states (paragraph 15 refers) that the Environmental Report may rely on earlier material published, but must bring it together so that it is identifiable in that report and that those affected should not have to read all previous reports to ascertain the current position.
20. This is further clarified in paragraph 40 of the Forest Heath Judgement that states in the that case “it was not possible for the consultees to know from it what were the reasons for rejecting any alternatives to the urban development where it was proposed or to know why the increase in the residential development made no difference. The previous reports did not properly give the necessary explanations and reasons and in any event were not sufficiently summarised nor were the relevant passages identified in the final report. There was thus a failure to comply with the requirements of the Directive and so relief must be given to the claimants”.
21. In *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council, Gedling Borough Council and Peveril Securities Limited and UKPP (Toton) Limited* [2015] EWHC 1078 (Admin)⁶ at paragraph 67, Jay J summarised the principles regarding the application of Regulation 12 (of the SEA Regulations) and the requirement to assess reasonable alternatives. In a similar view to that made in the Forest Heath Judgement, he set out *that “the earlier documents must be organised and presented in such a way that it may be readily be ascertained, without any paper chase being required, what options were considered and why they had been rejected”*.
22. The SA/SEA is therefore not considered to be legally compliant.

Matter 6: Homes for All
Are the plan’s policies sound and effective in delivering a wide variety of quality homes to provide for the needs of all the community?

⁵ <http://www.bailii.org/ew/cases/EWHC/Admin/2011/606.html>

⁶ <http://www.bailii.org/ew/cases/EWHC/Admin/2015/1078.html>

Question 6.2 The delivery of affordable homes (having regard to Item 14 of my Initial Questions)

23. The Housing affordability ratio by local authority district⁷, published by the Office of National Statistics shows that the property price to earnings ratio was 12.5 in 2017. The house price data used in the affordability ratios in this release are based on the HPSSA data published in April 2018.
24. There is a need for 517 affordable housing units per year according to the West Surrey SHMA Guildford Addendum Report. Table 6 of the Council’s Annual Monitoring Report 2016/17 (GBC-LPSS-CD-020)⁸, published in November 2017, shows the number of affordable homes completed by year in Guildford Borough. As can be seen, there were only 32 affordable homes (gross) completed in 2016/17, which the AMR acknowledges (at page 14) is a significant decrease to that in the previous reporting year.

Table 6 Number of affordable homes completed by year in Guildford borough.

Year	Number of new affordable homes (gross)
2009/10	50
2010/11	85
2011/12	68
2012/13	22
2013/14	17
2014/15	68
2015/16	125
2016/17	32

25. It is clear from the Inspector’s initial Item 14 that he considers it unlikely that the Council can demonstrate exceptional circumstances as to why the threshold has been set at 5 or more homes. It is therefore clear that while the Council has sought to lower the threshold, that the Inspector is minded to make a modification to raise this threshold to 10+ dwellings. If the modification is made then this will mean that smaller sites will not contribute towards the affordable housing need identified.
26. Conversely, the site at Land to the west of Fairlands could provide up to 550 houses. Based on emerging policy H2 Affordable Housing of the Submission Local Plan (GBC-LPSS-CD-001a) and the requirement for at least 40% affordable housing, the site could potentially provide up to 220 affordable units or approximately 42.5% (220/517 as a percentage) of the annual affordable housing requirement.

⁷

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandanddwales/2017>

⁸ https://www.guildford.gov.uk/media/19972/Monitoring-Report/pdf/Annual_Monitoring_Report_201617

27. The SHMA Addendum Report (March 2017) (GBC-LPSS-SD-003)⁹ considers affordable housing need, but does not consider starter homes. The Consultation version of the NPPF (2018) proposes to include 'starter homes' within the definition of affordable housing as starter homes are proposed to be included in Annex 2: Glossary of the draft revised NPPF. RPS therefore considers that the Council should make its position on starter homes clear within the plan or through consultation on a subsequent Housing Needs SPD.

9. Spatial Strategy, Green Belt and Countryside Protection

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?

28. Policy S2 and in-particular the preamble is not sufficiently clear to explain the apportionment of growth throughout the plan period within Guildford. Specifically, the policy should provide both percentage and numerical figures identifying how much housing, employment and retail land is being provided at each principal settlement.

29. The evidence base within the plan refers to a 'Settlement Hierarchy' (P51 & 317). However, no settlement hierarchy is provided within the plan and specifically within Policy S2. This is a clear omission which requires rectification including the apportionment of growth within the hierarchy through the Local Plan Modification process.

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.**

Spatial Distribution

30. As referred to under question 9.1, the plan is lacking a clear explanation of both its settlement hierarchy and the spatial distribution of growth. Without such an explanation it is extremely

⁹ <http://www.guildford.gov.uk/newlocalplan/CHttpHandler.ashx?id=23816&p=0>

difficult to provide a definitive answer to the Inspector's questions. The plan is therefore clearly not sound in this respect, not being effective.

31. The Council's current strategy (paragraph 4.1.6) is to focus growth towards the most sustainable settlements, including Guildford as the principal location for development. After Guildford, development is proposed to urban areas followed by growth to the villages.
32. It is entirely appropriate to recognise that Guildford should be the focus for growth and RPS agrees that development should be directed to the largest centre. However, the proposed strategy does not appropriately acknowledge that sustainable settlements located very close to Guildford, such as Fairlands, also have a strong functional relationship and effectively act as a 'suburb' of Guildford. For example, it is as well related to the centre of Guildford as the proposed allocation A25 (Gosden Hill Farm).
33. This principle of a relationship between a village acting as a 'suburb' to a City was considered by the Planning Inspector¹⁰ who carried out the examination of the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (Inspector Elizabeth C Ord in her report dated 26 October 2017). In her report, the Inspector considered that there were exceptional circumstances for land to be removed from the Green Belt at Twigworth village (paragraph 168). This was on the basis that land was in a sustainable location and Twigworth village, which is not contiguous with the main urban area of Gloucester, had the potential to contribute to Gloucester's housing supply later in the Plan period (paragraph 174).
34. There are similarities between the functional relationship of Twigworth village and Gloucester, and Land to the west of Fairlands and Guildford in terms of land within the Green Belt being able to serve a larger urban area due to its functional relationship and sustainability credentials.
35. Given this relationship, Policy S2 should be modified to acknowledge the suitability of Fairlands within the wider Guildford Urban Area. The plan currently identifies Fairlands as a Rural Local Centre, however this categorisation is inappropriate as Fairlands is strategically placed to accommodate further growth at Guildford and should be considered as part of the wider urban area for the purposes of the Local Plan. RPS considers that Fairlands is an appropriate location on the edge of the town, capable of supporting further growth as part of a modified urban extension strategy for the town.
36. The Council's own evidence recognises the sustainability of Fairlands as an appropriate location to direct new growth to. The Guildford Settlement Hierarchy Study (2014) identifies

¹⁰ https://drive.google.com/file/d/0BwVPoSbUL_uXbUJWbzRNQnN0Q3M/view

Fairlands as appropriate and capable to support new development. The consideration of the settlement as a sustainable location is also mirrored in the Council's Green Belt and Countryside Study Vol V (2014) (GBC-LPSS-SD-015i) which recognises that the settlement is supported by a number of services and a good public transport system (paragraph 24.65 refers).

37. As part of the Council's Draft Local Plan (2014), Land at Fairlands was included as an appropriate location for Safeguarded Land, to be removed from the Green Belt in the event that further land was required for development. RPS considers that the Council was correct to identify this land, as a sustainable location, capable of supporting the expansion of Guildford. As a response to this Thakeham has prepared an up-dated Delivery Document (May 2018) for promoted land at Fairlands (**Appendix 1**), which can deliver up to 550 dwellings in the plan period, along with other sustainability benefits including a SANG and land for a Park and Ride facility.

38. Guildford is constrained to the south of the town by the Surrey Hills Area of Natural Outstanding Beauty (AONB) which restricts how the town can grow. The Council is already proposing growth to the east, north and west of Guildford. Accordingly, RPS considers that Fairlands should be recognised as a potential growth location to serve the expansion of Guildford which should be amended as part of this policy.

Movement Patterns

39. In order to provide a balanced mix of sites, Fairlands provides a further location for growth which is within proximity of the town along the A323 and is considered to be a sustainable settlement for Green Belt release as part of the Local Plan.

40. The locational suitability of Fairlands has not changed, following the Council's previous assessment of the settlement in its Settlement Hierarchy Study (2014). The findings of that study remain relevant today and have not been up-dated or amended in the intervening period.

41. As indicated in the accompanying Delivery Document (Appendix 1), land exists at Fairlands, as promoted by Thakeham to support a new 2.4ha Park and Ride facility, which could facilitate further public transport services to the benefit of Fairlands/Guildford. More importantly it could ease existing congestion along the A323 by removing cars from the road as part of a more holistic solution to the transport arrangements. This is considered to deliver a wider sustainability benefit as part of the proposal.

42. As demonstrated in the Transport Assessment included within the Regulation 19 Representations, Fairlands as a settlement has a very good and frequent bus service, with a

peak frequency of 5 buses per hour, enabling one to travel to Guildford, Aldershot and beyond. An updated Transport Strategy (May 2018) building on the earlier Transport Assessment work is included as **Appendix 2**.

43. In addition, a new Park and Ride facility is included as part of Thakeham's proposals for Fairlands. This new facility will include a frequent bus service between the site and Guildford town centre. It will be available to both new and existing residents of Fairlands. In this respect a letter is attached to this Statement (Appendix B of Appendix 2) from the national coach operator Stagecoach, providing strong support for the presence of a new park and ride facility at Fairlands. As set out in the Transport Strategy (May 2018), Stagecoach maintains other Park and Ride facilities in Guildford and the KITE service in the vicinity of the site. They have confirmed the proposal for a Park and Ride facility on the land west of Fairlands is viable and deliverable. This is on the basis of the existing strong bus service provision, the new patronage associated with the proposed residential uses and also due to the fact there is no similar provision in this part of the orbit of Guildford. Stagecoach suggests that the proposed scheme could credibly intercept not only journeys on Aldershot Road, but also from the A322 Worplesdon Road and Bagshot Road corridors. They also consider that the existing bus services would be sufficient to offer an attractive service to motorists, with the possibility of additional services during peak hours (paragraph 3.14). Exact details regarding proposed public transport provision will be provided in due course (paragraph 3.15).

Green Belt and Landscape Impact

44. Whilst there are clearly overlaps between these two issues, the NPPF deals with Green Belt and Landscape Impact policy in two very different ways. Given this, each is dealt with separately below.

Green Belt

45. There have been some changes to the text in this emerging policy P2: Green Belt. However, the most significant change relates to a number of sites which have been removed from the Council's supply, on the presumption that the Council's housing need has decreased. As indicated in response to Issues 2, 3, 4 and 5, Thakeham (Guildford Housing Forum) does not hold this view and considers that further increases to the Council's supply are needed to ensure the correct level of growth to be delivered through the Plan Period.
46. As a largely Green Belt authority, Guildford needs to first consider the correct extent of need in the Borough so that it can make an informed assessment of how much land is required to be released from the Green Belt. Failure to do so will result in an unsound strategy which does not balance the need for housing with the appropriate quantum of housing sites. As part of the Council's approach towards Green Belt release, there needs to be certainty at this stage of plan making that the right locations for growth have been selected and, in

accordance with paragraph 83 of the NPPF, the Green Belt is capable of enduring beyond the Plan Period.

47. Paragraph 83 of the NPPF also indicates that the Green Belt boundaries should only be amended in exceptional circumstances, through the preparation of the Local Plan. The Council has already taken the in principle view that exceptional circumstances are justified through the need to facilitate the development that is needed and promote sustainable patterns of development (paragraph 4.3.16 refers).
48. In terms of what can be qualified as exceptional circumstances, RPS considers that the reasons expressed by the Council are correct and exceptional circumstances do exist in Guildford. This approach is consistent with decisions in the High Court¹¹, in which J Jay determines that in respect of the Green Belt, it is necessary to consider sustainable patterns of development and in particular the consequences for sustainable development which may require revision of the Green Belt (paragraph 19 of [2015] EWHC 1078 (Admin) refers). Achieving sustainable development is a golden thread running through the NPPF, which should be the guiding force of new Local Plans. The Local Plan therefore needs to consider the extent of Green Belt release needed in order to facilitate sustainable patterns of development in Guildford.
49. Furthermore, the Draft Consultation NPPF (2018)¹² makes it clear that *“where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport”* (paragraph 137). As referred to earlier under the ‘Movement Patterns’ heading and within RPS’ Transport Assessment and updated Transport Strategy, there are 5 bus services in hour in the peak, which it is considered would constitute a location that is well-served by public transport.
50. RPS is of the view that the plan offers little flexibility in supply and taking into account factors which would increase the need for housing, there is real risk for delivery. This brings into question the soundness of the Council’s strategy for Green Belt release and whether further releases are needed at this stage of plan making.
51. The Council’s evidence base underpinning this policy is the Guildford Green Belt and Countryside Study, which has been updated on a number of occasions and is now in the fifth

¹¹ *Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council* [2015] EWHC 1078 (Admin), Jay J

¹²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf

iteration (2014) for the release of housing sites. This study considered a number of locations for Green Belt release in the Borough, focussed around the urban areas and surrounding villages.

52. The Council's 2014 Green Belt study acknowledges that Potential Major Development Areas (PMDAs) at the villages could play an important role in presenting an alternative or additional option towards meeting the Council's growth requirements (paragraph 21.3 refers). The Study draws on paragraph 52 of the NPPF which emphasises how extensions to existing settlements can come forward:

"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. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development".

53. RPS consider that further consideration should be given to the potential for development at the surrounding villages identified in Volume 5 of the Green Belt Study (GBS), and in particular the role of Fairlands as a commutable suburb to Guildford.
54. Fairlands is identified as the 10th most sustainable location in the Borough as part of the Council's May 2014 Settlement Hierarchy study. This study has been used to inform potential locations capable of major expansion, of which, Fairlands is one of the 10 settlements taken forward in the study. This study has also been used to influence the Council's Green Belt and Countryside Study Vol V (2014), in which the evidence identified Fairlands as a sustainable location for growth (paragraph 24.65) in its own right. However, for the reasons identified above and Fairlands functional relationship with Guildford, for the purposes of policy formation Fairlands should be treated as part of the wider urban area of Guildford.
55. The relationship between Green Belt and Landscape Impact is addressed below.

Landscape Impact

56. RPS is concerned over the lack of consistency and lack of justification in the way the Council has considered landscape impacts of developments. By way of example reference is provided below to the Council's Green Belt assessment of the impact of Thakeham's Fairlands site, where the only reference made to the purposes of the Green Belt (purpose 2), despite the impact on the Green Belt being the sole reason for discounting the site. This relates to Paragraph 80 of the NPPF, which considers the need to prevent neighbouring towns merging into one another.

57. The Council's evidence in this regard is not consistent, as evident through the inclusion of Blackwell Farm, Hogs Back (Policy A26). This proposed allocation for approximately 1,800 dwellings to the south east of Guildford is located to the south of Wood Street Village and spatially is a closer distance than Thakeham's site at Fairlands.
58. When the 2014 GBS was written, it was done without the benefit of detailed landscape work to inform a masterplan for Land at Fairlands and how proposals could be sympathetically incorporated into the wider area. Evidence was presented to the Council at the Regulation 19 Submission stage, and is provided within the Delivery Document 2018 (Appendix 1) which includes detailed consideration of the local landscape features and demonstrates how a proposed development could respond to the sensitivities of the Green Belt. The masterplan for the site has been informed by a Landscape and Visual Appraisal (LVA) of the Green Belt, which has been undertaken by Barton Willmore. This explores in more detail how the site performs against the purposes of the Green Belt in paragraph 80 of the NPPF (Table 7.1 of Appendix 2.4 refers to the submission reps).
59. This LVA of the Green Belt undertaken by Barton Willmore demonstrates that the site makes only a limited contribution to the purposes of the Green Belt and is surrounded by defensible boundaries, which justifies the release of the land from the Green Belt. The Delivery Document 2018 (Appendix 1) demonstrates how the proposed development could come forward, which includes substantial green space and SANG to the south west of the site, which would form a defensible boundary and prevent the merging of Fairlands and Wood Street Village.
60. As demonstrated above, the Council's assessment of Land at Fairlands has not been correctly assessed in terms of the impacts on the Green Belt and the site's ability to come forward for development. The Delivery Document supporting these representations considers how Land at Fairlands can be developed in a planned and coordinated way, following its release from the Green Belt through the Local Plan. The site is considered to be a logical location for Green Belt release, in an appropriate location close to Guildford and will give greater certainty to the Council's strategy for delivering housing sites.

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.)

61. The evidence clearly points to the need for both greenfield and Green Belt releases. The previous housing requirements (322 pa) for Guildford were based on Regional Strategy requirements of the South-East Plan and significantly lower than the OAN now required (GBC-LPSS-001). Paragraph 3.12 acknowledges that delivery has been persistently below requirements and the Councils acceptance of a 20% buffer acknowledges this.
62. Given the Plans uplift in housing requirements and the previous poor record of delivery in the Borough, there is a clear need for new means of delivery, which far exceeds both urban and previously developed land capacity. This requires commitment to a plan led approach to site release necessitating new means of delivery and flexibility in excess of the plans housing requirement. This is reflective of the draft NPPF requirements for OAN to be minimum figures (paragraph 11). This necessitates both Green Belt and greenfield allocations.

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?

63. Whilst RPS has concerns over the delivery assumptions associated with the strategic allocations (addressed elsewhere), exceptional circumstances exists for strategic locations to be released from the Green Belt.

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

64. In relation to Fairlands it is appropriate to inset the village from the Green Belt, due both to the scale of the settlement and the function it performs in acting as a suburb to Guildford. The inset does though not acknowledge the Frameworks requirement to ensure the Green Belt boundaries will endure beyond the plan period.

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?

65. As addressed elsewhere, there is a need for increased housing provision and flexibility within the plan. In considering the need for housing and employment allocations, the Sustainability Appraisal process and consideration of reasonable alternatives should favour areas of lesser landscape quality including sites outside both the AONB and AGLV.

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?

66. This issue has not been properly considered through the Council's evidence base to date and therefore it is not possible for any party to accurately answer this question.
67. This is essentially a matter for a Modifications process and the appropriate consideration of all reasonable alternative sites through a revised/new Sustainability Appraisal.
68. In RPS view the spatial strategy is likely to need minor adjustments and for example commitment to the inclusion of Fairlands within the wider Guildford area as a location which can sustainably accommodate an element of the Boroughs housing requirements.