



Guildford Greenbelt Group,
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21st October, 2022

Mr David Reed BSc Dip TP DMS
Planning Inspector
c/o Programme Officer – Mr Robert Young
Guildford Borough Council, Millmead,
Guildford, GU2 4BB

Dear Mr Reed,

Examination in Public: Guildford Borough Council Development Management Polices
Hearings Statement from Guildford Greenbelt Group

Guildford Greenbelt Group (GGG) currently have four Councillors elected locally for Guildford Borough Council. We, along with members of R4GV, have consistently responded to each iteration of the GBC Local Plan: Development Management Policies. This has included being members of the cross-party GBC Local Plan Panel which involved contributing to discussions and providing feedback on the proposed polices, as well as being members of the GBC Executive Advisory Boards, taking the opportunity to raise areas for consideration within each of the proposed polices.

We are grateful to the GBC Planning Policy Team and Lead Councillor for the opportunity to contribute during this process and we appreciate a number of small changes that have been made as a result of our input.

However, we do still have concerns with regard to a number of the proposed polices that we would like to put forward for consideration by the Inspector, and others involved in this part of the process, with the view to strengthening, adding clarity, and focusing on what is critical to preserving, protecting, and enhancing our Borough.

Our aim is not to delay matters unnecessarily, but to ensure that we have the best policies for Guildford; our town and our villages.

Our concerns and proposed solutions are detailed below, with reference to our latest submitted responses to the Regulation 19 consultation in February, 2022, and our responses to the Regulation 18 consultation:

Policy H5: Housing Extensions & Alterations, including Annexes

GGG remain concerned that this policy is restricting sensible extensions and alterations for those homes located within the Green Belt. As a Group we are staunch supporters of protecting our Green Belt and preventing harm to its openness, however, increasingly we are having to call in applications to the GBC Planning Committee for consideration because of issues with the % increase on the original footprint.

The policy restricts residents who want to increase the size of their family home in order to stay in our villages, new residents who have bought an old house and want to make necessary alterations to bring their property up to date with modern living standards and make it more sustainable. The policy significantly penalises small home owners who may have changing needs and circumstances.

This equally applies if the applicant simply wants a garage, a utility room, a new porch, or a home office above their existing garage.

It is our belief that the reliance on using 1948 as the baseline for consideration is out of date, and we recommend using 1968 as a new base. This is used by Waverley Council so bringing our policy in line with our collaborating partner would seem sensible.

An alternative solution would be to actually state within the policy an acceptable % range for footprint, volume, etc so that applicants know what they have to work with. Elmbridge do this, with a policy that is specifically related to development of existing buildings within the Green Belt (DM18).

Greater definition within the policy would obviously rely on other DMP policies such as D4, to ensure proposals were not out of character with the existing local character and street scene. This would also prevent some of the inconsistencies that we have experienced with planning officer's recommendations and decisions (examples provided below).

Illustrative examples:

20/P/00446 Meadow Cottage, East Clandon - owner sought approval to extend the back of his cottage to include a utility room to re-place his outdated boiler in order to deliver significant improvements in energy efficiency to his home. The extension was 7sqm, and was supported by East Clandon Parish Council and GBC's Conservation Officer. It was recommended for refusal due to harm to the openness of the Green Belt. I called this in and the recommendation was successfully over turned by the Planning Committee.

19/P/01474 Greenmantle, West Clandon - owner looking to remodel the family home. Well screened, no impact on street scene. Refused.

20/P/00283 Gullivers, The Street, West Clandon - owner wanted a small single storey rear extension of minimal size. Refused.

21/P/02059 Clandon Downs, High Clandon, East Clandon - owner seeks home office above existing garage. Well screened, small increase on original footprint. Not yet determined, initially refused.

Other examples can be provided.

GGG recommend:

- Using 1968 as a baseline for the original footprint
- Including within the guidance % ranges for acceptable footprint, volume, etc.

- Emphasising within the policy or guidance that extensions must retain the local character (link to D4).
- Within the proposed policy have a specific section for homes in the Green Belt vs those that are not.

Policy P6/7: Biodiversity in New Developments

GGG fully support this Policy which states that 'Qualifying development proposals are required to achieve at least 20% net increase in biodiversity'.

This policy is critical to the protection, preservation and enhancement of our local wildlife and natural environment.

Policy P8/9: Protecting Important Habitats and Species

GGG welcome the changes that have been made to this policy to bring a much-needed focus on the protection of hedgerows: a critical source of habitat, and much needed wildlife corridors.

We remain concerned with regard to the protection of Ancient Woodland. We welcome the addition of a statement that ensures any national revision (upwards) to the 15m buffer zone will be deferred to. The inclusion of a recommended increase in the 15m buffer if required per development is also acknowledged. However, the simple fact here is that Natural England (NE) remain under resourced. They have stated in their responses to recent applications that they will only respond with a 'desk top' study on all but essential applications, and that is not guaranteed.

We must take responsibility by ensuring greater protection for an irreplaceable habitat. According to the Woodland Trust, who seem more in touch than NE, only 2.5% of this rich diverse habitat remains across the UK. It must be preserved at all costs.

GGG recommend:

- Increase the buffer zone for Ancient Woodland to 20 metres.

Policy D4: Achieving High Quality Design and Respecting Local Distinctiveness

GGG welcome the changes that have been made to this policy following ours, and R4GVs, feedback during the Local Plan Panel sessions and the Joint EAB meetings.

However, we have noted over the course of the last four years that the issues of density and height have been consistently raised as issues at GBC's Planning Committees, particularly with regard to the consideration of allocated sites.

The density and height of new homes in the allocated sites so far approved in West & East Horsley, as well as Send for example, has been so significantly greater than that of the existing that the character of these villages is now changing in front of our eyes.

In West Horsley e.g., where the average height of local buildings was no more than 8.2 metres, we have seen the approval of the majority of new homes on two of the approved allocated sites of 9 metres plus (some 215 new homes). The prevailing local character has been completely ignored in favour of increased height. This also applies to density, where the average density of the same sites approved is around double of that locally. Once again, the local character was ignored and not given significant weight in the planning balance, resulting in the destruction of the local character and landscape setting of our village.

GGG support the views of Merrow Residents' Association and GRA. It is critically important to ensure that there is a clear distinction between housing density and the height of any development, and that the local character of an area must be given greater weight.

GGG recommend:

- The introduction of a separate Height Policy e.g., as Brighton Council have achieved.
- The introduction of density guidelines across the Borough dependant on the location i.e., a set for the Town Centre, the outlying suburbs, and for our more rural villages.
- The development of Design Codes to support this policy, and the revision of the GBC Residential Design Guide (2004).

Policy D9: Residential Infill Development

Please note: The original name of this policy was Residential Intensification. With all the feedback, and disagreement over infilling the policy name was changed with a view to specifically addressing infilling. GGG do not agree with this change as the name Residential Intensification enables the consideration of windfall sites that are coming forward at pace, as well as other forms of intensification of development.

One of the biggest areas of planning contention at GBC is limited infilling. These types of applications are frequently seen at Planning Committee, following call-in by Ward Councillors. The significant issue is the lack of definition for limited infilling within the NPPF. GBC's Local Plan: Strategy & Sites 2015 – 2034 goes some way to address this, but it is still causing problems because it is not specific and therefore open to interpretation.

Our expectation was that the Development Management Policies would seek to address this, by providing greater clarification and guidance to support strategic policy P2: Green Belt, with a number of additional policies to guide both applicants and officers in terms of what is acceptable and what is not. Indeed, this is the only policy from Local Plan: Strategy & Sites that does not have supporting policies to provide back up and clarification. We consider that the DMP represents the only opportunity for GBC to set out a much clearer definition of infilling and how this is considered in the determination of planning applications, since the long promised Green Belt SPD (accepting that this is guidance, not policy) has not yet been delivered.

Indeed, a significant number of organisations, such as local Parish Councils, responded to this issue during the consultation process requesting that infilling was more tightly defined in order to protect the character of villages in the Green Belt, as well as those villages who have been removed from the Green Belt as part of the process for Local Plan Part 1.

Illustrative Examples:

20/P/00467 Approval of four homes in the back gardens of three houses along Ockham Road North, East Horsley – this land was not 'substantially surrounded by development' and was clearly back land development. It was also completely out of character with the existing street scene and pattern of settlement in this area.

18/P/02083 Approval of Land to the rear of Tanglewood, Oakwood Drive, East Horsley, an 'infilling' development of two detached homes in land beyond the existing house. This application was not surrounded by any development.

20/P/00708 The Cottage, The Street, West Clandon. Here the owner originally wanted to simply replace his bungalow with a three bed two storey house. Refused as disproportionate additions (Green Belt), a pair of semi-detached houses was subsequently allowed – significantly larger than the footprint of the original dwelling, and out of character with the immediate street scene.

19/P/00866 Elm Cottage, The Street, West Clandon. A bungalow demolition and two new houses allowed on an extremely small plot and again out of keeping with the immediate street scene, and certainly not a gap between existing houses as it was next to a side road, Bennett Way.

The continuing saga at Barn End, The Street, West Clandon is also worth mentioning. The applicant has used the planning system to apply for a series of applications that are essentially a means to infill an area of Green Belt land that is regarded by local residents as a green lung within in West Clandon. Reference: 19/P/00924, 19/P/01693 and 20/P/01165.

GGG recommends:

- Change the name of the policy back to Residential Intensification.
- Limits placed on the size and number of properties which can be built through infilling within a village or other area stated clearly within the policy guidance.
- A clause in the policy which specifies that the site must be substantially surrounded by other development.
- Guidance to ensure that infilling is reflective of the prevailing character and density of the surrounding area.
- Consideration to be provided on the cumulative impact of sequential 'limited infilling' developments on the existing community.
- Consideration of Epsom & Ewell's policy which prevents new building from exceeding the height of the existing buildings, and does not lead to a major increase in the developed proportion of the site.
- Consideration of Waverley's policy which is more restrictive of infilling and does **not** include 'the small-scale redevelopment of existing properties within such frontage', or 'infilling of small gaps within built development'.

D14: Carbon Emissions from Buildings

GGG have consistently put forward that the target for reduced carbon emissions for new buildings (domestic) should be higher if we are to seriously address the impact that building works have on our environment.

Viability was tested by GBC at 35%, but during this consultation process the Building Regulations were revised in June this year, raising the targets to 31% for domestic and 27% for non-domestic. With so much development taking place in Guildford Borough and given the responsibility that developers and builders should be charged with 'Sustainable' and 'Responsible' deliverers, GGG would request that the target for carbon emissions reduction in domestic buildings is raised to 40% and that of non-domestic raised to 30%.

The construction industry is one of the biggest emitters of carbon, and this alone warrants pressure on those responsible to deliver, as they so often promise and the NPPF demands, sustainable developments.

GGG recommend:

- Raise the required reduction of carbon emissions target to 40% for domestic buildings.
- Raise the required reduction of carbon emissions target to 30% for non-domestic buildings.

Yours sincerely,

Catherine-Anne Young

Catherine Young (Mrs)

Guildford Greenbelt Group – Deputy Leader

Borough Councillor for Clandon & Horsley