

GUILDFORD BOROUGH GREEN BELT & COUNTRYSIDE STUDY

Volume VI – Insetting of Gypsy and Traveller Sites and defining Green Belt Boundaries within Guildford Borough

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25. INTRODUCTION

- 25.1 This volume of the Green Belt and Countryside Study was instructed, and undertaken in May 2014. It responds to the potential concern that if proposed Gypsy and Traveller sites put forward in the Council's emerging Local Plan, remain designated as lying within the Green Belt, there will be uncertainty as to whether any associated planning applications for such a use at the allocated sites would be likely to achieve consent. This concern arises from recent Government guidance, with regards to what constitutes very special circumstances to justify inappropriate development, such as new dwellings, in the Green Belt.
- 25.2 The National Planning Practice Guidance (at 3-034-20140306) advises that;
- *"Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt".*
- 25.3 As a result, even if proposed Gypsy and Traveller sites are allocated within the emerging Local Plan, yet remain within the Green Belt, there is a real risk that the sites would not be deliverable due to insufficient very special circumstances being present to justify planning consent being granted.
- 25.4 If there is notable doubt with regards to the deliverability of allocated Gypsy and Traveller sites in the Green Belt and the Council's emerging Local Plan relies upon such allocations to deliver the necessary Gypsy and Traveller accommodation provision, then this part of the Local Plan is likely to be found to be unsound. The NPPF requires at paragraph 47 that the Local Plan meets the full, objectively assessed needs for market and affordable housing, including identifying key sites which are critical to the delivery of the housing strategy.
- 25.5 The Council have therefore instructed Volume VI of the Green Belt and Countryside Study in order to assess whether potential Gypsy and Traveller sites that currently lie within the Green Belt can be appropriately inset from the Green Belt, thereby providing greater certainty that such allocations will be deliverable. Other volumes of the Green Belt and Countryside Study have assessed whether land should be removed from the Green Belt designation, and Green Belt boundaries amended accordingly, in order to accommodate the Borough's housing requirements.

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- 25.6 The specific sites to be assessed have been identified by the Council, and are included within the Traveller Strategic Housing Land Availability Assessment (Traveller SHLAA), issued in May 2014. The Traveller SHLAA also includes many other sites across the borough that do not lie within the Green Belt, and as a result do not require further consideration as part of this study. The Council have also requested that a site for Travelling Showpeople, which might have potential to accommodate a greater number of dwellings than are currently present on the site, is included within the assessment.
- 25.7 For clarification, the remit of this study has not considered the need, or the appropriateness of specific sites for Gypsy and Traveller allocations, and focuses upon whether or not their inseting from the Green Belt is appropriate.

26. METHODOLOGY

- 26.1 Paragraph 85 of the NPPF advises that when defining Green Belt boundaries, local planning authorities should *“ensure consistency with the Local Plan Strategy for meeting identified requirements for sustainable development”*, amongst other things. In this instance, the Council have undertaken background work which has identified the required allocation of Gypsy and Traveller sites as part of the emerging Local Plan, to accord with National Policy and Guidance on the matter. The Council’s background work has identified that it will be necessary to identify some sites currently lying within the Green Belt in order to accommodate the necessary requirements in this respect. As explained above, in order that such allocations are realistically deliverable, and thereby ensure that the Local Plan is sound in this respect, it will be necessary to amend the detailed Green Belt boundaries, thereby inseting the allocated sites from the Green Belt designation.
- 26.2 Such Green Belt boundary amendments are therefore considered to be consistent with the requirements of Paragraph 85 of the NPPF, although detailed assessment must also allow for another requirement of paragraph 85, that local planning authorities should, *“define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”*. If boundaries cannot be defined in such a manner, it would question the appropriateness of inseting the site from the Green Belt, on the basis that it would not adhere to the relevant guidance on the matter, as set out within the NPPF.
- 26.3 The detailed locations of defensible Green Belt boundaries were identified from site surveys, aerial imagery and detailed OS mapping. In addition to infrastructure features, such as highways and railways being acceptable ‘physical features’, it is also considered that woodlands, hedgerows and tree belts can reasonably be identified as appropriate boundaries, given that in many incidences they will provide greater permanence than man made features. More temporary features, such as fencing, are not considered to provide the degree of permanence necessary to represent a Green Belt boundary in accordance with the NPPF.
- 26.4 The first stage of the methodology therefore assesses whether the site boundaries, as identified on the Traveller SHLAA document, adhere with the requirements of the NPPF, and would therefore enable the appropriate inseting of the site from the Green Belt. If such an assessment determines that the boundaries in place do not adhere with the NPPF requirements, it is considered appropriate and helpful as a second stage, to assess whether any alternative

boundaries in the vicinity of the site might sensibly be used as an alternative Green Belt inset boundary. If an alternative boundary, beyond that of the identified Traveller SHLAA site, is considered appropriate, the Council will need to give consideration to the following factors, in advance of proposed allocations within the emerging Local Plan;

- Whether the site is an appropriate location to accommodate additional gypsy and traveller pitches
- Whether there is agreement from the Landowner for the wider site to be allocated as such, thereby demonstrating deliverability.
- Whether there is a requirement for Gypsy and Traveller pitches across the wider site area in the forthcoming Local Plan period. If there is not such a requirement, then consideration should be given to safeguarding the land, in order to address longer term Gypsy and Traveller needs, stretching beyond the plan period. If such an approach is followed, and safeguarded land is introduced, the Local Plan will need to make clear that the wider area of land is not allocated for development at the present time and that permission for the development of such safeguarded land should only be granted following a Local Plan review which proposes the development, as advised within paragraph 85 of the NPPF.

27. FINDINGS

- 27.1 The following pages assess the identified sites against the Green Belt boundary criteria, as referred to in the NPPF.

Land at Cobbetts Close, Normandy

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent ?</p> <p>The site appears as a clearance within a wooded environment, and as a result there is a clear recognisable boundary in place that is likely to be permanent.</p>	<p>Yes</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p>	<p>n/a</p>
<p>Should the site be inset from the Green Belt?</p> <p>Part of the site, towards the western corner is undeveloped at present. It would appear sensible to include this area within the inset boundary, and the Council can assess whether this area is required for allocation in the forthcoming Local Plan, or whether it should be safeguarded for development in a future plan period.</p>	<p>Yes</p>

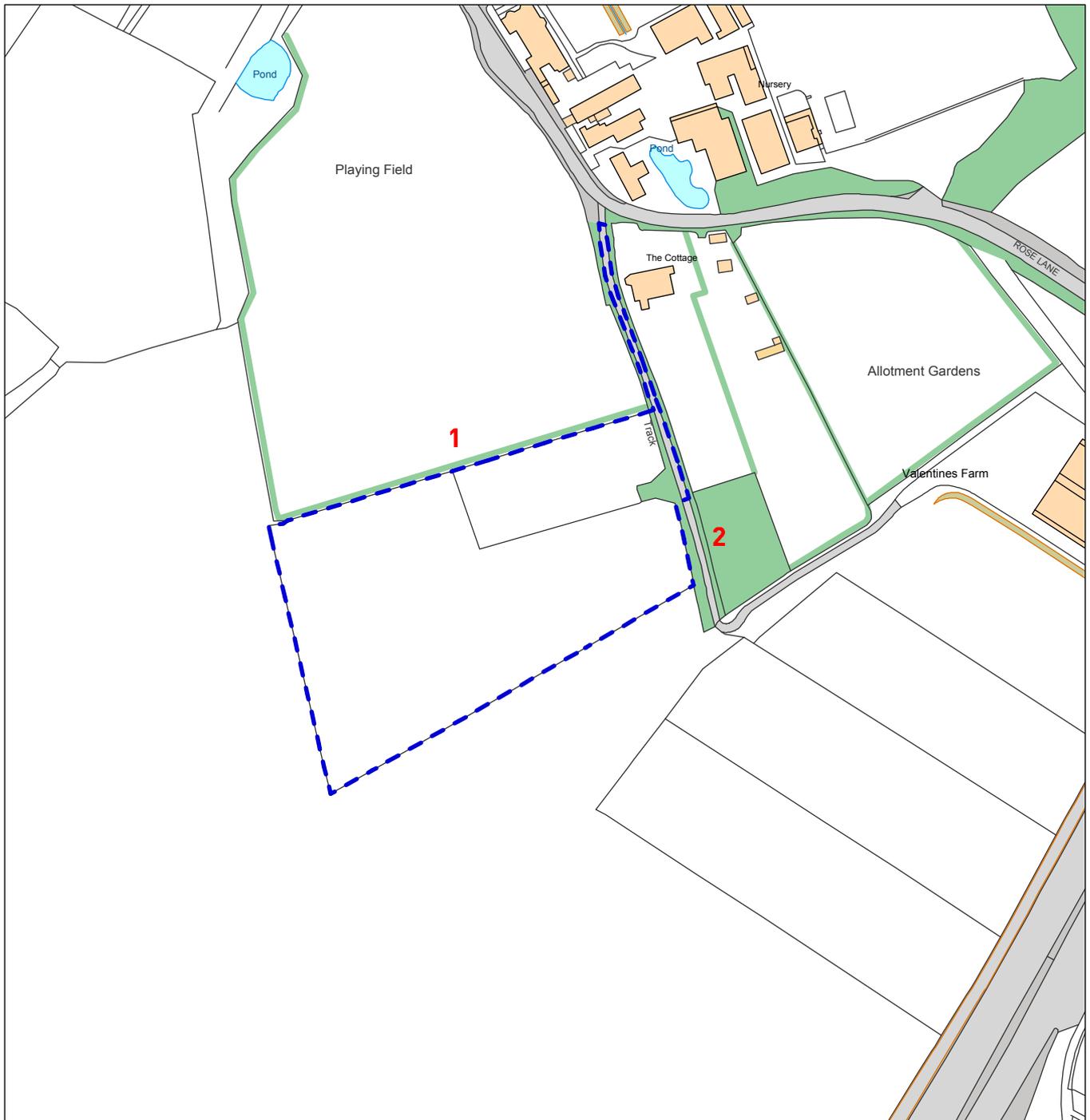


1. Woodland to the north of the site between Clasford Bridge, Cobbetts Close and Cobbett Hill Road.
2. Treebelt to the east of the site between Cobbetts Close and Merrist Wood Golf Course.
3. Woodland to the south of the site at Clasford Common and Cobbett Hill Road.
4. Treebelt to the west of the site between Cobbetts Close and Cobbett Hill Road.



Land at the Paddocks, Rose Lane, Ripley

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent ?</p> <p>A strong hedgerow boundary is in place along the site's northern boundary, and the hedgerow also defines the majority of the eastern boundary of the site. However, the southern and western boundaries are defined by post and rail fencing, leaving approximately half the site defined by boundaries that are not considered to be permanent in terms of the NPPF requirements.</p>	<p>No</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p> <p>Permanent recognisable boundaries in the form of hedgerows are in place to the south and west of the site, however they lie in excess of 250 meters away, and are not considered to represent an appropriate alternative inseting boundary.</p>	<p>No</p>
<p>Should the site be inset from the Green Belt?</p> <p>The site itself does not primarily consist of appropriate boundaries to justify inseting from the Green Belt, and there are not considered to be alternative boundaries beyond the immediate site that would represent an appropriate expansion of it.</p>	<p>No</p>

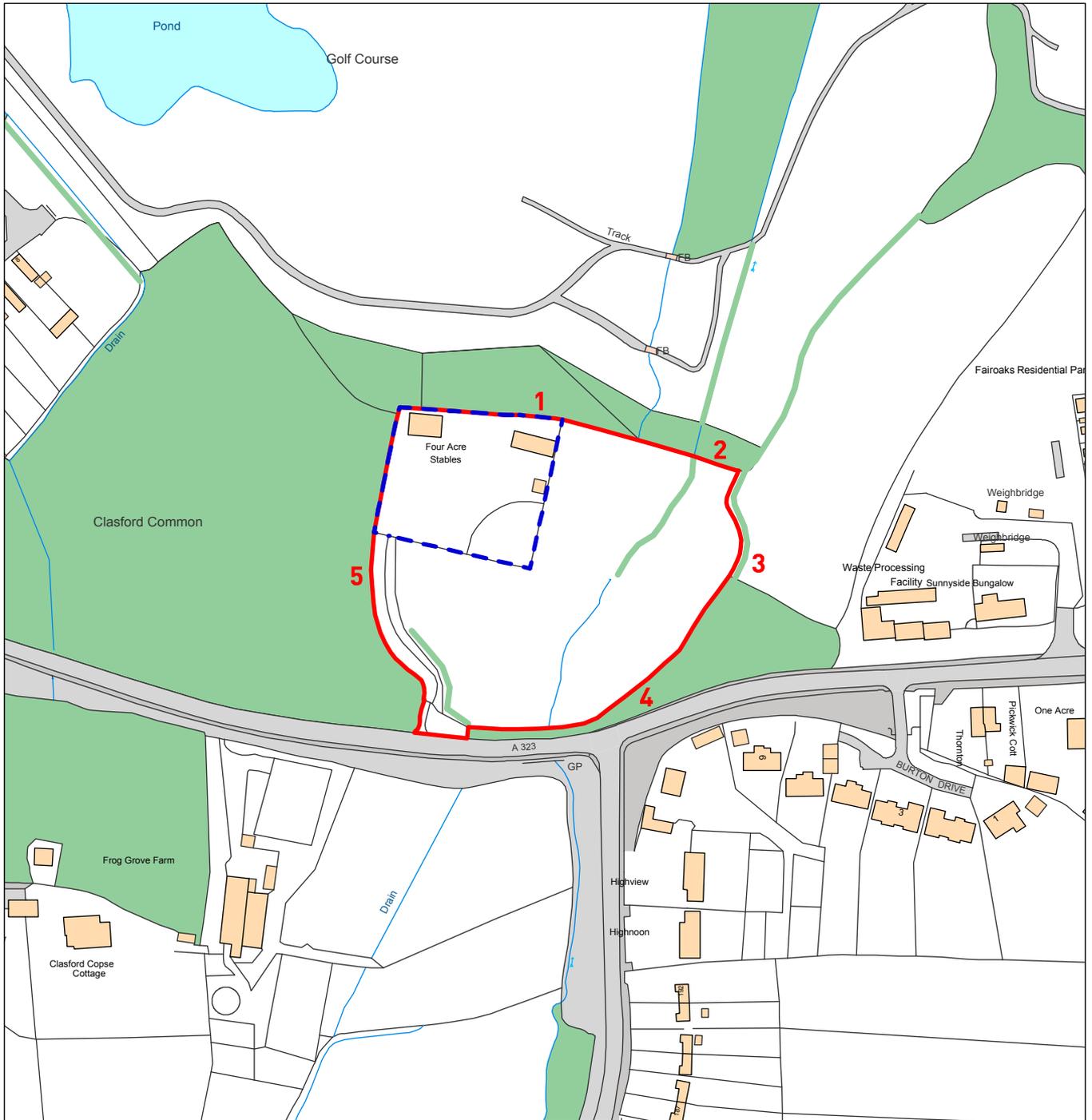


 SHLAA Boundary
  Defensible Boundary

1. Hedgerow to the north of the paddock site.
2. Farm track and hedgerow to the east of the paddock site leading off Rose Lane.

Four Acre Stables, Aldershot Road, Normandy

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent ?</p> <p>A clear physical boundary, in the form of woodland and a treeline defines the western and northern boundaries of the site. However, the southern and eastern boundaries of the site are defined by close boarded fencing, which is not considered to adhere to the boundary requirements of the NPPF.</p>	<p>No</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p> <p>A strong hedgerow adjoining Aldershot Road and a woodland edge/treeline to the east of the site, do provide recognisable permanent features that could provide an appropriate expansion to the site identified in the Travellers SHLAA document.</p>	<p>Yes</p>
<p>Should the site be inset from the Green Belt?</p> <p>It is recommended that the Council investigate whether the extended site boundary following the hedgerow adjoining Aldershot Road and woodland to the east would gain support from the Landowners and offer a deliverable site. The Council would then need to assess whether the entirety of the extended site should be allocated for Gypsy and Traveller use in the Local Plan, or whether the extended element should more appropriately be defined as safeguarded land, with potential to come forward through future Local Plan reviews.</p>	<p>Yes</p>



1. Woodland to the north between the site and Merrist Wood Golf Course.
2. Treebelt and hedgerow to the north east between the site and Merrist Wood Golf Course.
3. Woodland to the south east between the site and the A323 Aldershot Road.
4. A323 Aldershot Road and hedgerow to the south of the site.
5. Woodland within Clasford Common to the west of the site.



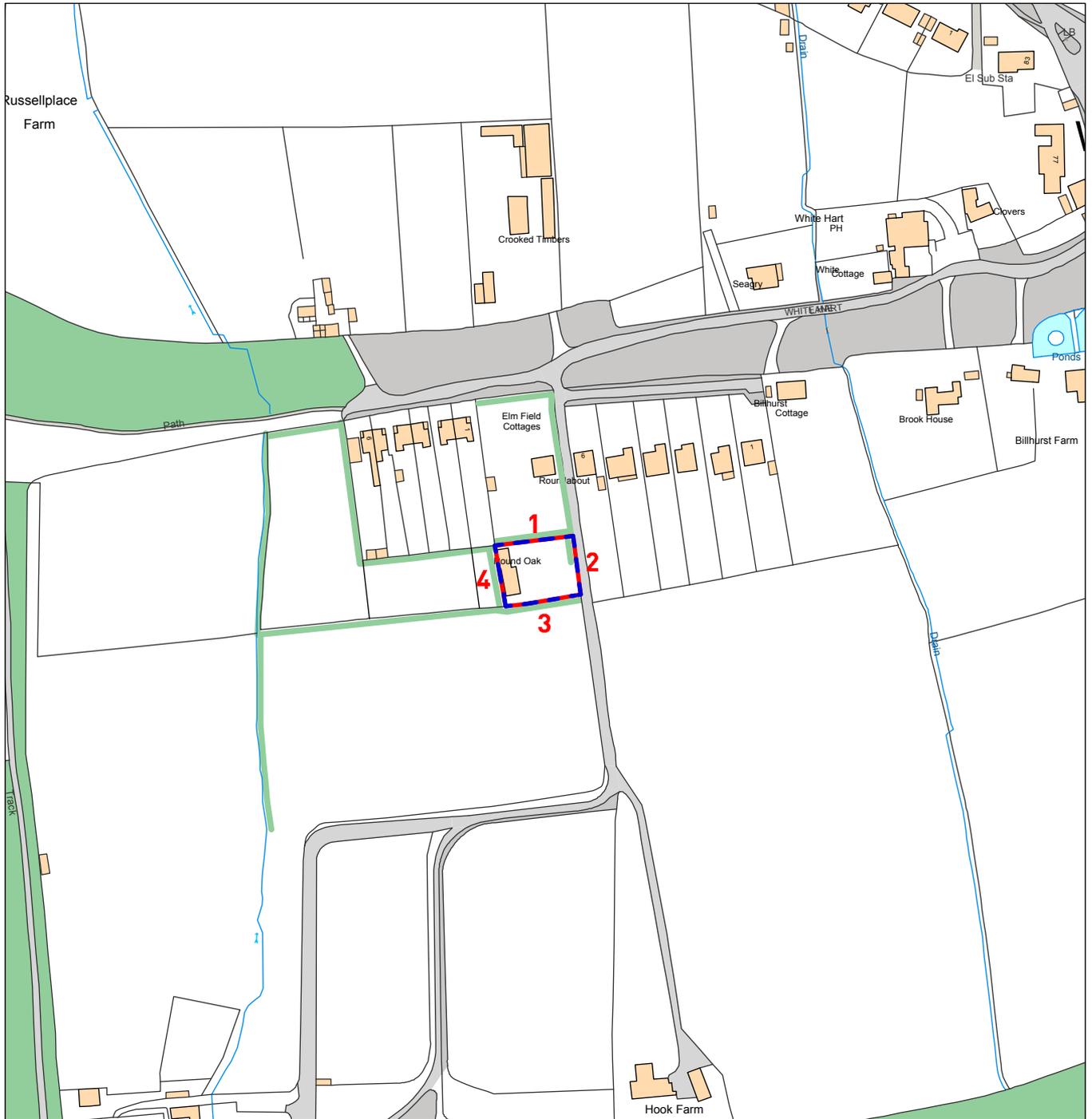
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**Four Acre Stables, Aldershot Road,
Normandy**

Land rear of Roundabout, White Hart Lane, Wood Street Village

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent ?</p> <p>A strong mature hedgerow defines the southern boundary of the site, with hedges also marking the majority of the eastern and northern boundaries. Existing built development at the site does abut the western boundary, although it is understood this relates to a temporary planning permission currently in place, and as a result cannot be considered to represent a permanent boundary. Hedgerow planting is however in place adjoining this boundary.</p>	<p>Yes</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p>	<p>n/a</p>
<p>Should the site be inset from the Green Belt?</p> <p>On balance, the majority of the established site boundaries are considered to adhere with the requirements of the NPPF, meaning inseting from the Green Belt is justified.</p>	<p>Yes</p>



1. Treeline to the north between the site and Elm Field Cottages.
2. Farm track and hedgerow to the east of the site leading off White Hart Lane.
3. Treeline and hedgerow to the south of the site.
4. Hedgerow to the west of the site.

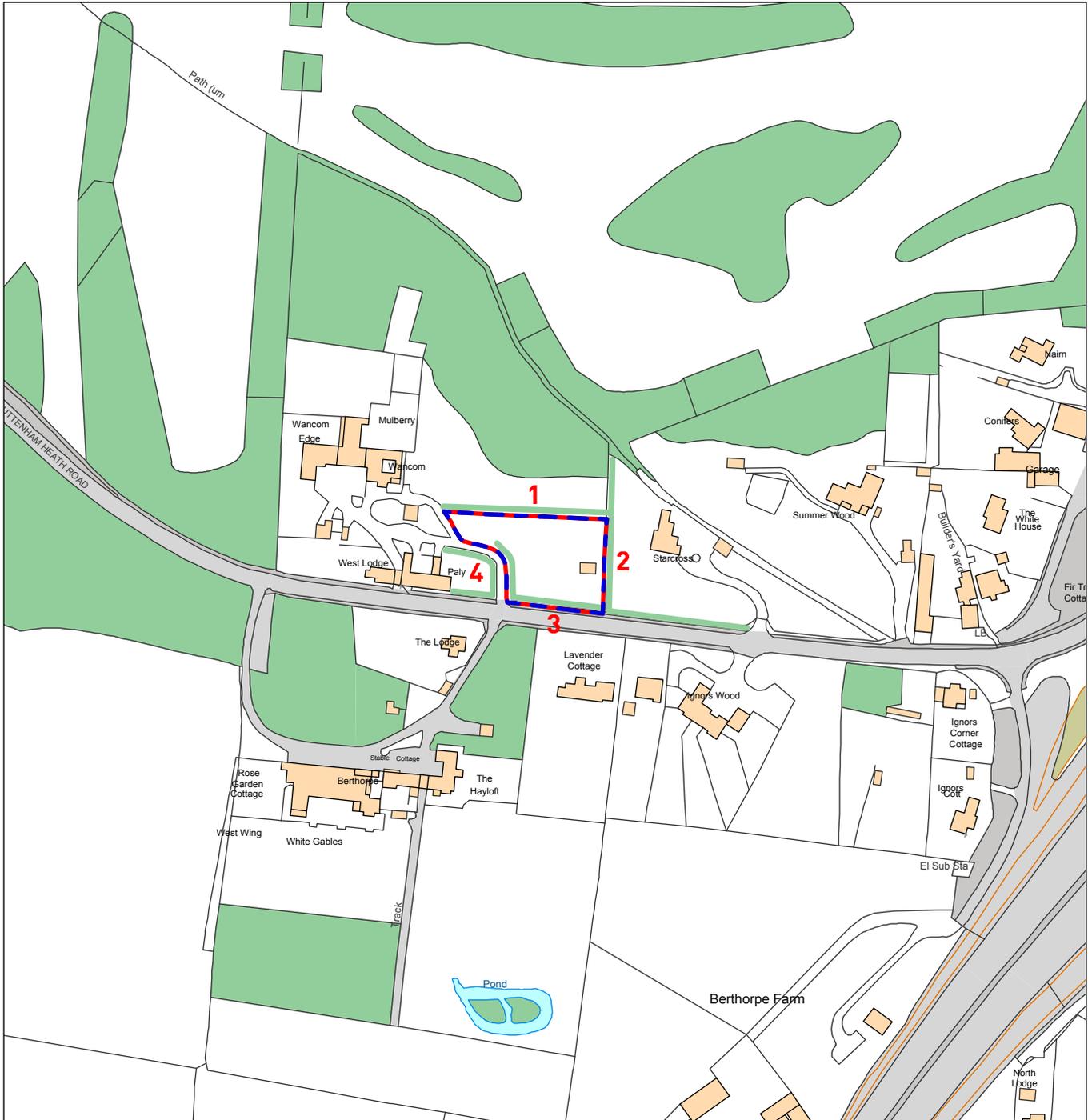


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The Orchard, Puttenham Heath Road, Puttenham

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent ?</p> <p>The northern and southern boundaries of the site are defined by strong established hedgerows, and the eastern boundary is defined by a hedge/tree line that is apparent. The western boundary is defined by hedgerow, and partly by close board fencing.</p>	<p>Yes</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p>	<p>n/a</p>
<p>Should the site be inset from the Green Belt?</p> <p>On balance, the majority of site boundaries are considered to adhere to the requirements of the NPPF in this respect and inseting of the site from the Green Belt is therefore justified.</p>	<p>Yes</p>



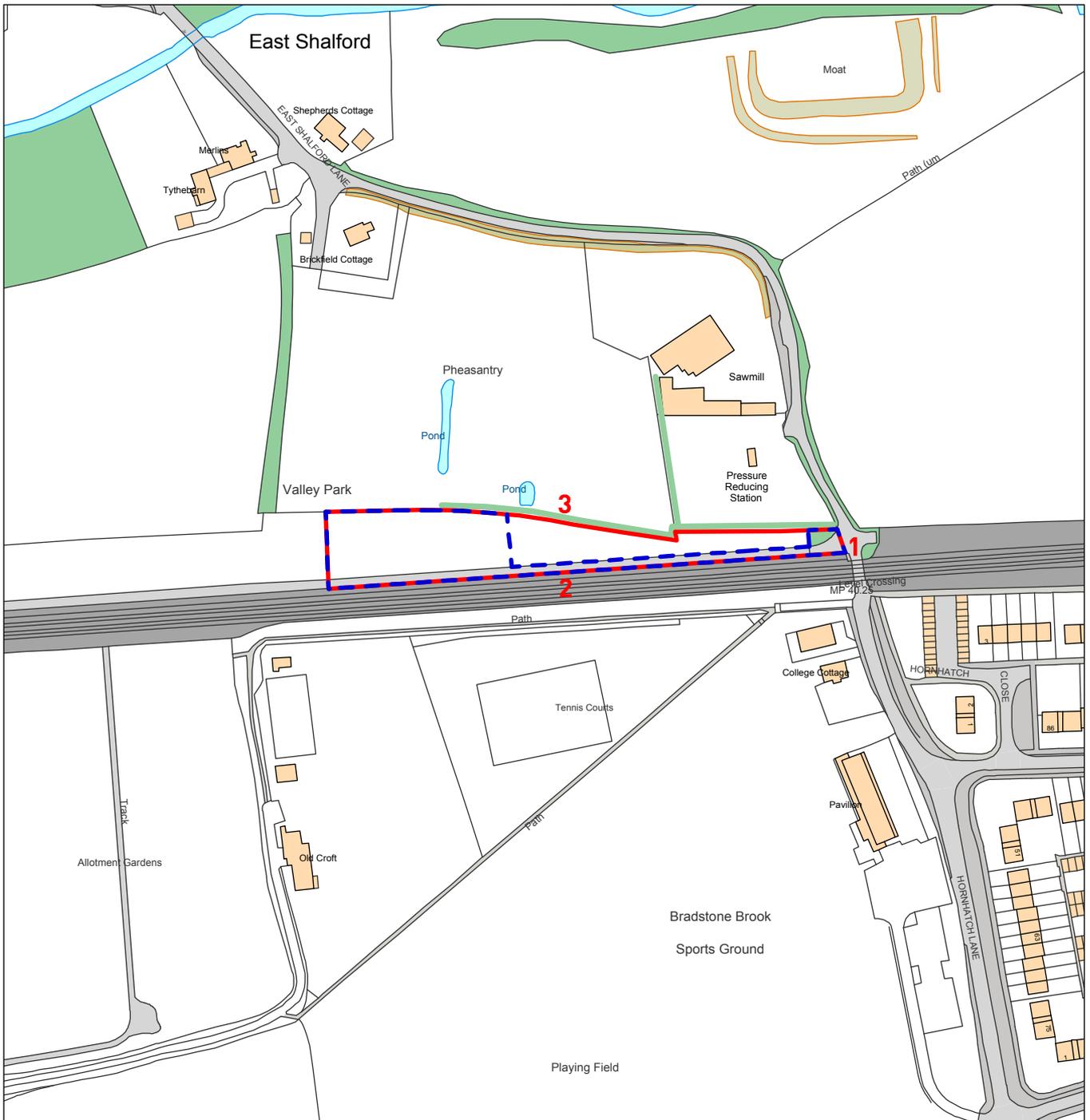
1. Treeline / hedgerow to the north of the site.
2. Treeline to the east of the site.
3. Puttenham Heath Road and hedgerow to the south of the site.
4. Hedgerow and access drive to residential properties to the west of the site.



**The Orchard, Puttenham Heath Road,
Puttenham**

Valley Park Equestrian Centre, East Shalford Lane, Shalford

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent ?</p> <p>The boundaries associated with the access, follow the northern edge of the hard surfaced access road, and to the south, follow the railway line. The eastern boundary of the main part of the site is not marked by a physical feature of the land, whilst the western boundary is only marked by a fence line.</p>	<p>No</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p> <p>It would appear feasible for the site boundary to be extended at its north eastern edge, so that it follows an established hedgerow/treeline, rather than the hard surfaced access way at present. This will enable the north/east and southern boundaries to follow physical, permanent features, although there does not appear to be a boundary further to the west that would relate sensibly to the site and adhere to the NPPF requirements. On balance however, the amended boundary, as described would result in the vast majority of the site's boundaries adhering to the NPPF's requirements.</p>	<p>Yes</p>
<p>Should the site be inset from the Green Belt?</p> <p>At present the temporary development on site, and boundaries shown on the Traveller SHLAA document are not considered to sufficiently adhere to the NPPF's requirements to justify being inset from the Green Belt. However, if the Council consider that an extension of the identified site to better follow clear, physical, permanent boundaries is appropriate, then on balance insetting is considered to be justified. If the Council consider it appropriate to identify the larger area for insetting, it will be necessary to assess whether the additional land beyond the original site is allocated for Gypsy and Traveller accommodation within the Local Plan, or identified as safeguarded land.</p>	<p>Yes</p>



1. East Shalford Lane at the railway level crossing to the east of the site.
2. Railway line to the south of the site.
3. Trees to the north of the site.

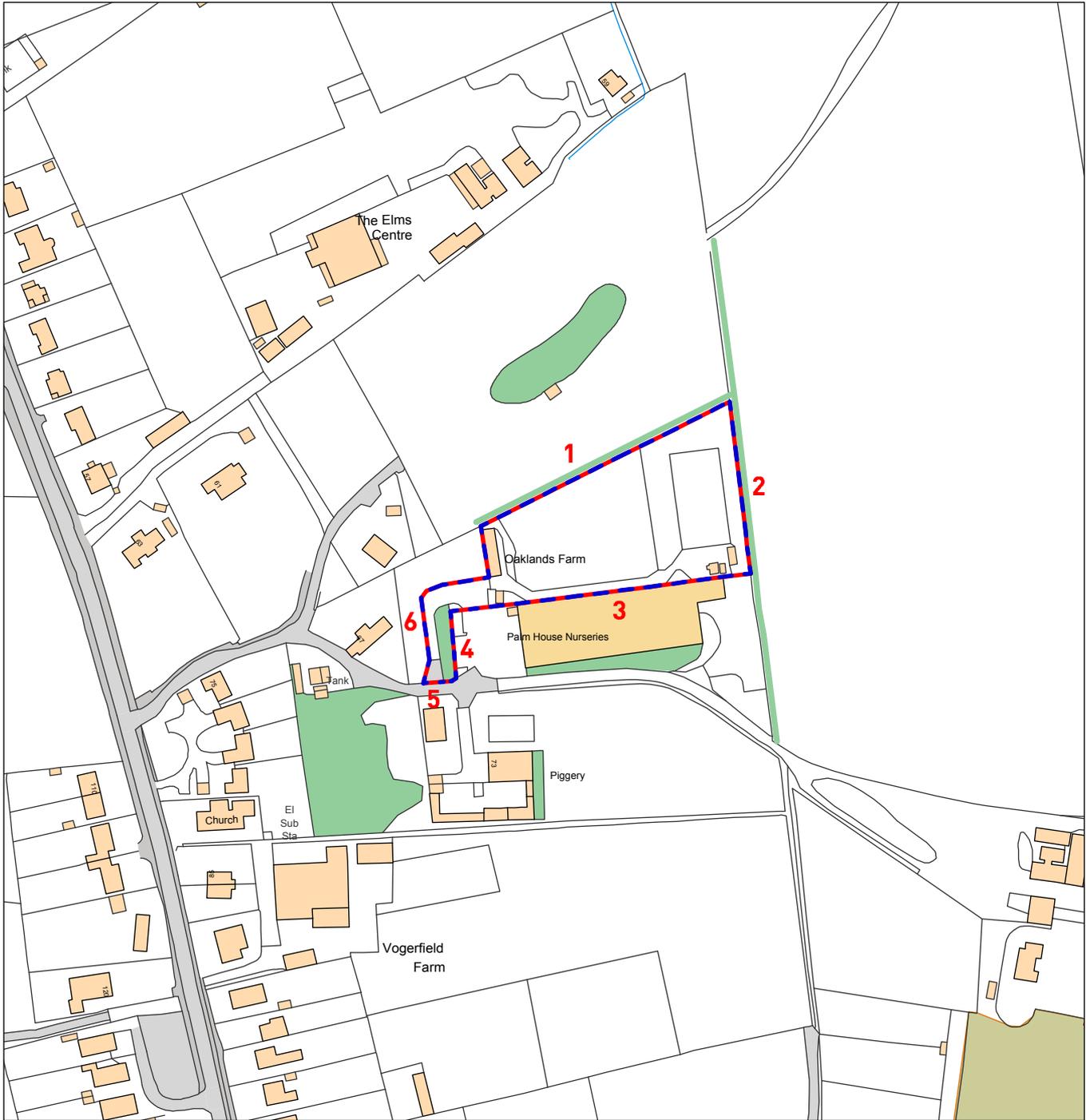


Land north of Green Lane East, Normandy

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent ?</p> <p>The north west and south east boundaries of the site are defined by significant treelines/hedgerows. However, part of the south west boundary is marked by a close boarded fence, whilst part is not marked by any physical feature. The north east boundary is understood to be marked by a fence line.</p>	<p>No</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p> <p>Land directly to the north east of the site is strongly contained by the presence of a significant tree/hedge line.</p>	<p>Yes</p>
<p>Should the site be inset from the Green Belt?</p> <p>Boundaries relating to the existing site, as identified in the Travellers SHLAA, are not considered to sufficiently adhere to the NPPF requirements. However, there is an opportunity to extend the site to the north east, which would enable the majority of boundaries to adhere in this respect. It is therefore recommended that the Council should give consideration to whether such an extension would be appropriate in this location, and if it is, whether the land beyond that of the existing site should be allocated for Gypsy and Traveller use, or safeguarded in the forthcoming Local Plan.</p>	<p>Yes</p>

Land rear of Palm House Nurseries, Glaziers Lane, Normandy

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent ?</p> <p>Much of the southern boundary of the site is defined by the northern elevation of the considerable nursery building. The eastern, northern and western boundaries are primarily defined by hedgerows and tree lines.</p>	<p>Yes</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p>	<p>n/a</p>
<p>Should the site be inset from the Green Belt?</p> <p>On balance, the site is primarily defined by boundaries that adhere to the NPPF's requirements and as a result, insetting from the Green Belt is considered justified.</p>	<p>Yes</p>



1. Treebelt to the north of the site.
2. Hedgerow and treebelt to the east of the site.
3. Northern elevation of Nurseries building.
4. Hedgerow to the south west of the site.
5. Access road to Palm House Nurseries.
6. Access road and hedgerow to the west.



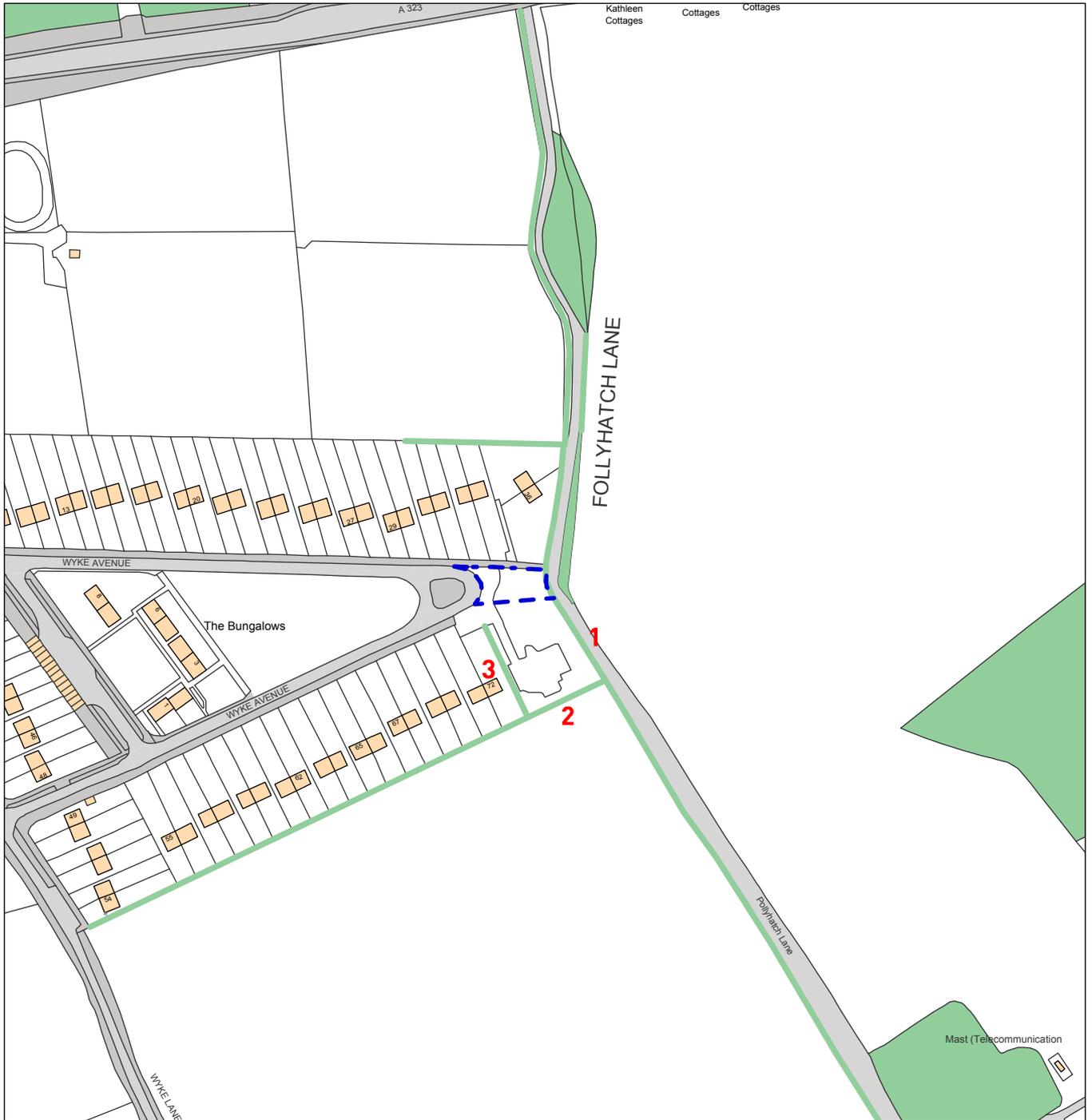
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**Palm House Nurseries, Glaziers Lane,
Normandy**

Land at Wyke Avenue, Normandy

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent ?</p> <p>The eastern boundary of the site is defined by a strong hedgerow/treeline. The northern and western boundaries of the site, follow the lines of adjoining footpaths/pavements. However, the entirety of the southern boundary is not marked by any physical permanent feature on site.</p>	<p>No</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p> <p>Planning permission has been granted, and development is currently underway, to introduce a terrace of three affordable houses directly to the south of the site. However, such development is not considered to provide a clear permanent boundary that relates sensibly to the main site</p>	<p>No</p>
<p>Should the site be inset from the Green Belt ?</p> <p>On balance, the absence of an appropriate boundary to the south of the site means that it is considered the requirements of the NPPF are not being adequately met, and the site should not be inset from the Green Belt.</p>	<p>No</p>

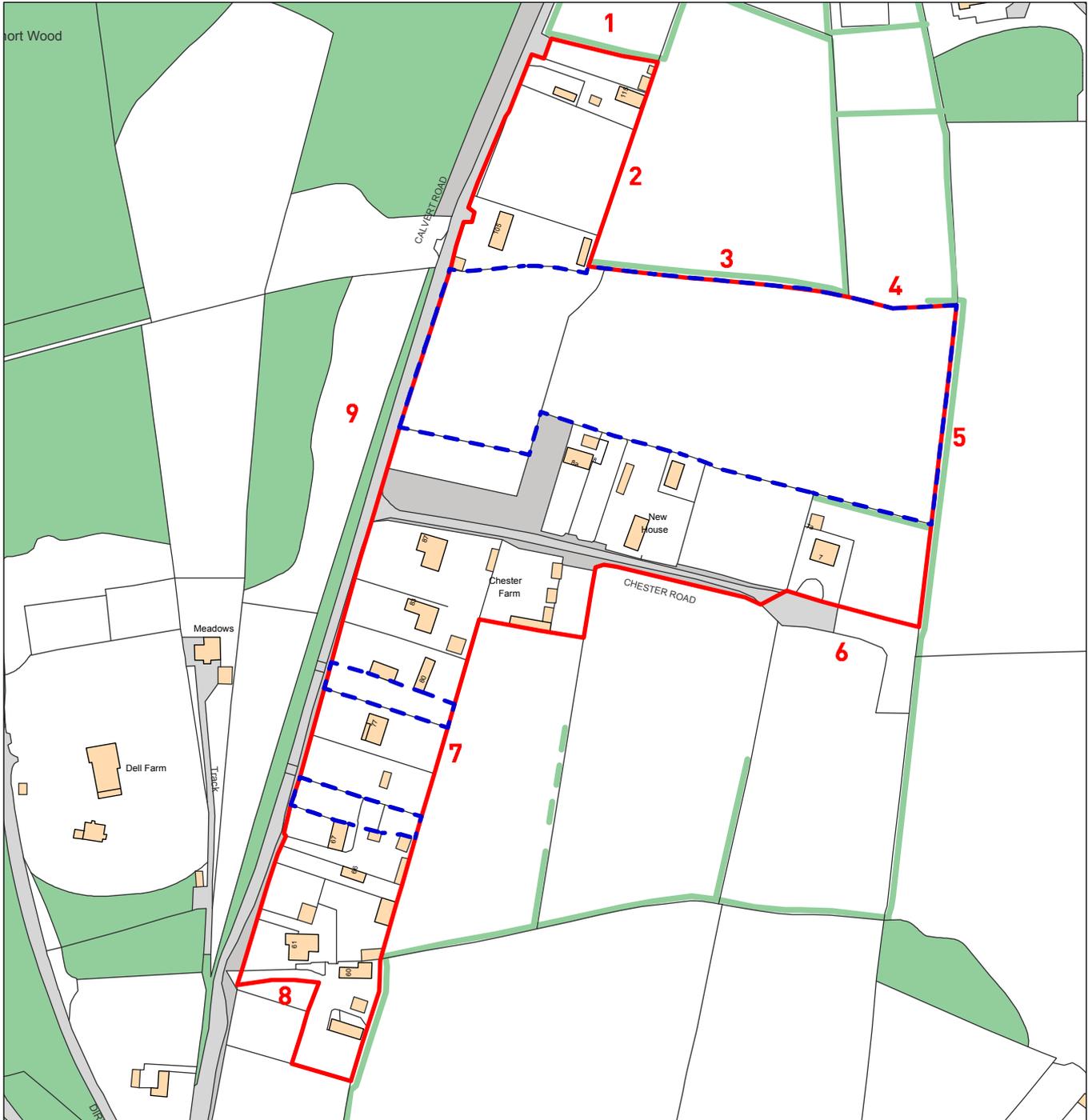


 SHLAA Boundary
 Defensible Boundary

1. Treebelt following Follyhatch Lane to the east of the site.
2. Treeline to the south of the site.
3. Highway and footpath at Wyke Avenue.

Land at Home Farm, Effingham

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent?</p> <p>Three sites have been identified within the Traveller SHLAA at Home Farm, Effingham.</p> <p>Two of these are single plots accessed off Calvert Road. Land adjoining 67 Calvert Road appears to be marked by a fence at its eastern boundary, and around its northern edge with some planting, buildings and open spaces providing access from number 67, along the southern boundary. Land at 80 Calvert Rd has no physical feature marking its northern boundary, whilst the southern and eastern boundaries do appear to be marked by hedgerows and treelines.</p> <p>The larger identified site is marked by a hedgerow along much of its northern and eastern edge. Calvert Road marks the western boundary of the site, whilst the southern boundary is made up of partial tree lines, some buildings, fencing and some unmarked sections.</p>	<p>Mixed</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p> <p>The SHLAA sites put forward at Home Farm, Effingham are unlike the others considered in this Volume, in that they are set amongst a wider mix of permanent and traveller housing, settled and non settled communities. In this instance, a more comprehensive inclusion of Gypsy and Traveller accommodation would provide a stronger long term inset boundary.</p> <p>An amendment to include Chester Road and Calvert Road as notable boundaries, along with a notable hedgerow at the north, and partial tree / hedge line to the east of the Calvert Road properties, would enable an appropriate alternative boundary.</p>	<p>Yes</p>
<p>Should the site be inset from the Green Belt?</p> <p>On balance it is recommended that a larger site than that identified on the separate SHLAA sites, would represent a more appropriate inset site, in which future Gypsy and Traveller dwellings can be accommodated.</p> <p>It is therefore recommended that the Council give further consideration to whether such a site is in an appropriate location for such additional accommodation, and if it is, whether parts of the site should be safeguarded from development as part of the emerging Local Plan, in order to serve future plan periods if it proves necessary.</p>	<p>Yes</p>



Recommended Green Belt Insetting Boundary

 SHLAA Boundary

 Defensible Boundary

1. Treeline to the north of 115 Calvert Road.
2. Farm track to west of 105 and 115 Calvert Road.
3. Farm track and hedgerow to the north of the pasture.
4. Hedgerow to the north of the pasture.
5. Treeline to the west of the pasture.
6. Chester Road.
7. Partial hedgerow and treebelt to the east of Calvert Road.
8. Access road to the south of the site.
9. Calvert Road and woodland to the west of the site.



Whittles Drive, Aldershot Rd, Normandy

<p>Are the existing site boundaries, as shown on the Traveller SHLAA, primarily represented by physical features that are readily recognisable and likely to be permanent?</p> <p>The site is well enclosed by a strong woodland edge at its north western boundary, strong tree lines which follow the north eastern and south western boundary, and a further tree line along the site's frontage with Aldershot Road.</p>	<p>Yes</p>
<p>If the answer to question 1 is No, are there appropriate alternative boundaries in the vicinity that would represent a physical feature that is readily recognisable and likely to be permanent?</p>	
<p>Should the site be inset from the Green Belt?</p> <p>The established boundaries of the site adhere to the requirements of the NPPF, meaning it would represent an appropriate inset from the Green Belt in this respect.</p>	<p>Yes</p>



1. Woodland to the north of the site at Island Copse.
2. Woodland to the east between the site and the lakes to the north of the A323 Aldershot Road.
3. Treeline and the A323 Aldershot Road to the south of the site.
4. Treeline to the west of the site.



28. CONCLUSIONS

28.1 For reasons set out within the associated tables and plans, the following Gypsy and Traveller sites are considered to be appropriate for inseting from the Green Belt, in that they adhere (or could do with reasonable expansion) to the requirements of the NPPF in terms of defining new Green Belt boundaries.

- Cobbetts Close, Normandy
- Four Acre Stables, Normandy
- Land rear of Roundabout, White Hart Lane, Wood Street Village
- The Orchard, Puttenham Heath Road, Puttenham
- Valley Park Equestrian Centre, East Shalford Lane, Shalford
- Land north of Green Lane East, Normandy
- Land rear of Palm House Nurseries, Glaziers Lane, Normandy
- Land at Home Farm, Effingham
- Whittles Drive, Normandy

28.2 The likelihood of delivery of the above sites for traveller and gypsy accommodation is likely to be increased if the emerging Local Plan incorporates Green Belt boundary changes to accommodate such inseting.

28.3 The following sites assessed were not considered to adhere with the NPPF requirements with regards to new Green Belt boundaries, indicating that their inseting from the Green Belt would be inconsistent with NPPF guidance on the matter.

- Land at Paddocks, Rose Lane, Ripley
- Land at Wyke Avenue, Normandy

28.4 If the above sites are to remain designated in the Green Belt, it is possible that Gypsy or Traveller accommodation can be achieved at the site, albeit sufficient very special circumstances will need to be demonstrated for such a development at the time of any planning application or appeal.